


25.07.2022


Due to summer vacation, the case is adjourned for the same on 26.09.2022.


Reader

26th Sept-2022

Appellant in person present. Mr. Asif Masood Ali Shah, Deputy District Attorney alongwith Mr. Hayatullah, ADEO on behalf of respondent No.4 for present.

Written reply/comments on behalf of respondent No. 4 submitted which is placed on file. Written reply on behalf of respondents No. 1, 3 and 5 not submitted despite last chance, therefore, their right for submission of written reply/comments is struck of. To come up for arguments on 26.10.2022 before D.B at Camp Court, D.I. Khan.

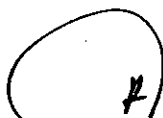


(Kalim Arshad Khan)
Chairman
Camp Court D.I.Khan

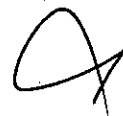
26th Oct 2022

None for the appellant present. Mr. Kabir Ullah Khattak, Additional Advocate General for respondents present.

Lawyers are on strike today. To come up for arguments on 23.11.2022 before D.B at Camp Court, D.I Khan. P.P given to the respondents.




(Rozina Rehman)
Member (J)
Camp Court, D.I Khan



(Kalim Arshad Khan)
Chairman
Camp Court, D.I Khan

25.01.2022

Tour is cancelled, therefore, case is adjourned to 25.05.2022 for the same as before.


Reader.


25.05.2022

Learned counsel for the appellant present. Mr. Raheem Ullah, Focal Person as representative of official respondent No. 2 alongwith Mr. Farhaj Sikandar, District Attorney present. None present on behalf of private respondent No. 5.

Representative of respondent No. 2 submitted comments, which are placed on file and copy of the same is handed over to learned counsel for the appellant.

Reply/comments on behalf of official respondents No. 1 & 3 as well as private respondent No. 5 are still awaited.

Previous date was changed on Reader Note, therefore, notice be issued to official respondents No. 1 & 3 as well as private respondent No. 5 through registered post and last chance given for submission of reply/comments. In case the last chance as given is not availed, the next adjournment shall be subject to prior payment of cost of Rs. 5000/- to the appellant, failing which the case shall be fixed before D.B for arguments without reply/comments deeming the same as waived off by the respondents. Adjourned. To come up for submission of written reply/comments on behalf of official respondents No. 1 & 3 as well as private respondent No. 5 on 25.07.2022 before the S.B at Camp Court D.I.Khan.


(Salah-Ud-Din)
Member (J)
Camp Court D.I.Khan

25.10.2021

Appellant present through counsel.

Asif Masood Ali Shah learned Deputy District Attorney for official respondents present.

Written reply on behalf of respondents No.1 to 3 & 5 is still awaited. Preceding date was adjourned on a Reader's note, therefore, notice be issued to respondents No.1 to 3 & 5 by way of last chance to submit reply/comments. To come up for written reply/comments on 23.11.2021 before S.B at Camp Court, D.I.Khan.



(Rozina Rehman)
Member(J)
Camp Court, D.I.Khan

23.11.2021

Junior to counsel for the appellant and Mr. Muhammad Rasheed, DDA present.

Written reply/comments of respondents No. 1, 2, 3 & 5 are still awaited. Fresh notices be issued to them as a last chance to submit written reply/comments on next date. Case to come up on 25.01.2022 before S.B at camp court, D.I.Khan.

In case the last chance as given above is not availed, the next adjournment shall be subject to prior payment of cost of Rs. 5000/- to the appellant failing which the case shall be fixed before D.B for arguments without reply/comments deeming the same as waived off by the said respondents.

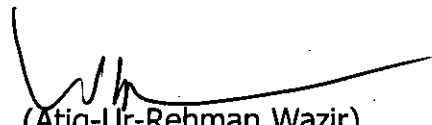


Chairman
Camp Court, D.I.Khan.

23.02.2021

Appellant in person present. Mr. Riaz Khan Paindakhel learned Asst. AG alongwith Hayat Ullah ADO on behalf of respondent No.4 present.

Representative of respondents No.4 submitted reply/comments which is placed on file. None present on behalf of official respondents No. 1 to 3 and private respondent No.5 therefore, fresh notice be issued to official respondent No. 1 to 3 and private respondent No.5 for submission of reply/comments. To come up for reply/comments on 24.03.2021 before S.B at Camp Court, D.I Khan.

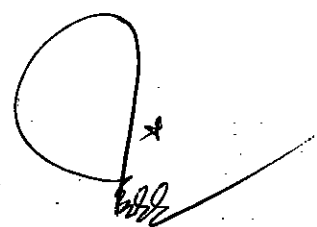

(Atiq-Ur-Rehman Wazir)
Member (E)
Camp Court, D.I.Khan

24.03.2021

Counsel for the appellant present. Mr. Muhammad Rashid, DDA for respondents present.

Written reply/comments on behalf of respondents No. 4 has already been submitted. Neither representative of respondents No. 1 to 3 and 5 is present nor their written reply submitted, therefore, notices be issued to them for submission of written reply/comments by way of last chance.

Adjourned to 21.06.2021 before S.B at camp court D.I.Khan.


(Mian Muhammad)
Member(E)
Camp Court D.I.Khan

21.6.21

Due to COVID 19, the case is adjourned to 25.10.21 for same.



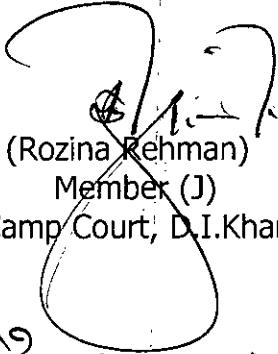
23.11.2020

Appellant present through counsel. Preliminary arguments heard. File perused.

Points raised need consideration. Admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to respondents for written reply/comments. To come up for written reply/comments on 23.12.2020 before S.B at Camp Court, D.I.Khan.

Annexed with the memo of appeal is an application for interim relief. Notice of the said application also be issued to respondents. In the meanwhile, status-quo be maintained till the next date, if not acted upon earlier.

Appellant Deposited
Security Process Fee
-01/12/20


(Rozina Rehman)
Member (J)
Camp Court, D.I.Khan

23.12.2020

Due to Covid-19, case is
adjourned to 23.02.2021
for the same as before.

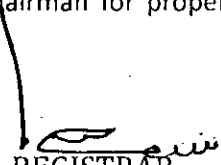


Reza

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - 11146 /2020


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/09/2020	<p>The appeal of M. Muhammad Sharif Khan resubmitted today by post through Mr. Muhammad Waqar Alam Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	11. 11. 2020	<p>This case is entrusted to touring S. Bench at D.I.Khan for preliminary hearing to be put up there on <u>23-11-2020</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Muhammad Sharif Khan Physical Supervisor under the control of DEO South Waziristan received today i.e. on 04.09.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Address of respondent no.3 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Annexures of the appeal may be flagged.
- 3- Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2600 /S.T,

Dt. 04/09 /2020


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.


Mr. Muhammad Waqar Alam Adv.
High Court D.I. Khan

Respected Sir

Objections dated 4/09/2020 over my
Appeal is removed accordingly please
entertain the same.

Appeal is resubmitted for further process.

Waqar Alam advocate Dera ismail Khan


17/9/20

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, CAMP COURT DERA ISMAIL KHAN

Service Appeal No. 1146/2020

Muhammad Shareef **VERSUS** Govt. of KPK and others

Service Appeal

INDEX

S. No.	Particulars of documents	Annexure	Page
1.	Grounds of service appeal with affidavits along with stay application	--	1-7
2.	Copy of the appointment order	A	8-9-6
3.	Copies of the Educational record	B	10-13
4.	Copy of the order alongwith charge report	C	14-15
5.	Copy of the impugned order dated: 27-04-2020	D	16-19
6.	Copy of Service Writ Petition and order dated: 11/05/2020	E & F	20-22
7.	Copy of the departmental appeal alongwith receipt dated: 07/05/2020	G	23-24
8.	Copy of Service Rules & Advertisement	---	25-29
9.	Vakalatnama	----	30

Dated: ___/08/2020

Humble Appellant
m. Shareef
Muhammad Shareef
Through Counsel

Muhammad Waqar Alam
Muhammad Waqar Alam
Advocate High Court

IN THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL CAMP COURT DERA ISMAIL KHAN

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. _____ / 2020

Diary No. 9642

Dated 04/9/2020

Muhammad Sharif Khan S/o Masap Khan Presently working and posted as Senior PET (BPS-16) against the post of Physical Supervisor under the control of District Education Officer South Waziristan Tribal District South Waziristan.

Cell# 0344-8391474

..... **Appellant**

VERSUS

1. Government of KPK, through Secretary Education S&L Khyber Pakhtunkhwa Peshawar.
2. Director E&S Education Khyber Pakhtunkhwa Peshawar.
3. Additional Director Establishment (NMD).
4. District Education Officer (Male) South Waziristan.
5. Mr. Kifayat Ullah CT, Teacher presently posted at GHS Warzikai Tehsil Ladha District South Waziristan.

..... **Respondents**

SERVICE APPEAL UNDER SECTION 4 OF THE
KPK SERVICE TRIBUNAL ACT 1974 AGAINST
THE IMPUGNED TRANSFER ORDER DATED
27/04/2020 ISSUED BY THE RESPONDENT NO.
2 AND IN DECISION OF DEPARTMENTAL
APPEAL OF THE APPELLANT.

Filed this day

Registrar

04/9/2020

Respectfully Sheweth;

Appellant humbly submits and request as under:-

That addresses of the parties are sufficient for the purpose of service

1. That the appellant was inducted as PET, Male Teacher against the vacant in the official respondent's office vide appointed order.

No. 2175-95 dated: 10-07-1999. Copy of the appointment order is enclosed as **Annexure A.**

2. That the Appellant performs his entire duty according to the wishes of his high ups and no complaint whatsoever has not been on the surface of his service record. Copies of the Educational record are enclosed as **Annexure: B.**
3. That the Appellant was transferred against the post of Physical Supervisor vide order dated: 30-11-2016 by the competent authority. Copy of the order alongwith charge report are enclosed **Annexure: C.**
4. That the Appellant is once again transferred from the permanent post due to illegal and unjustified reasons vide impugned order dated: 27-04-2020 vide which one Mr. Kifayat Ullah CT, Teacher was given the post of Appellant and the Appellant is displaced from the service without any post assigning by the competent authority, hence the order dated: 27-04-2020 is against law and facts. Copy of the order dated: 27-04-2020 is enclosed as **Annexure: D.**
5. That the appellant being dissatisfied from the impugned order dated: 27-04-2020 has filled a Writ Petition in the Peshawar High Court Bench Dera Ismail Khan in which the Honourable High Court issued status quo in favor of the appellant vide order dated: 11-05-2020. Copy of the Writ Petition alongwith order dated: 11-05-2020 are enclosed as **Annexure: E & F** respectively. *Sheer*
6. That after getting status quo from the Honourable High Court the appellant *a* made a departmental representation against the impugned transfer order to the respondent No.01 which is not decided in the statutory period given in the law by the respondent No. 01. Copy of departmental appeal alongwith receipts is enclosed as **Annexure: G.** *d*
7. That now due to the in decision over the departmental appeal of the appellant; the appellant has no other remedy accept to knock the door of this Honourable Court Tribunal U/S 4 of the Service Tribunal Act, 1974 inter alia, on the following grounds.

GROUNDS: -

- a) That the impugned notification dated: 27-04-2020 and in decision over the departmental appeal dated: 07-05-2020 are illegal without lawful authority and against the natural justice.
- b) That it is pertinent to mention here that the private respondent was awarded a post of ADEO (Male) at Office of the District Education Officer SWTD, vide order dated: 02-04-2020 which is enclosed herewith as ready reference and this shows his influence in the department.
- c) That the respondent No. 04 is very influential person and illegally transferred him from the concerned authorities by doing illegal means just to deprive the competent and eligible persons of the department.
- d) That the impugned notification dated: 27-04-2020 is against law and facts because the private respondent is admittedly a CT, Teacher and in the law and rules of the department a CT, Teacher could not be adjusted/ transferred against the post of Physical Supervisor, hence on this sole ground the notification dated: 27-04-2020 is liable to be set-a-side.
- e) That the Appellant is a senior most PET, Teacher and also having qualification and ability against the post of Physical Supervisor whereas respondent#5 is much more junior to the Appellant and having no experience or qualification against the post of Physical Supervisor, hence the notification dated: 27-04-2020 is liable to be set-a-side by this Honourable Court. *Heu*
- f) That the impugned office order dated: 27/04/2020 is against the Constitution, Service Laws, Rules, Departmental Policy, and natural justice, rather it is violation of posting/transfer policy of the provincial Government. Copies of the Service Rules alongwith advertisement is enclosed herewith as ready reference which provide clear mechanism for the post of JDPE in the Education Department, hence the impugned transferred

order dated: 27-04-2020 is passed in violation of ibid law Rules and regulations.

- g) That act of the respondent's especially respondent No. 3 is without jurisdiction based on mala-fide hence liable to be declaring as null and void by this Honourable Court.
- h) That Counsel for the Appellant may please be allowed to raise additional grounds during the course of arguments.

It is therefore respectfully prayed that on acceptance of this Service appeal this honorable court is humbly requested to declare the impugned notification dated 27/04/2020 issued by respondent No. 2 is without jurisdiction, without law full authority and based on malafide, and furthermore the respondents are directed to adjust the appellant against the post of Physical Supervisor on permanent basis being senior most employee of the department.

Any other relief deemed appropriate in the given circumstances may also be granted in the large interest of justice.

Humble Appellant

M. Shareef

Muhammad Shareef
Through Counsel

Muhammad Waqar Alam

Muhammad Waqar Alam
Advocate High Court

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, CAMP COURT DERA ISMAIL KHAN**

Service Appeal No. _____/2020

Muhammad Shareff **VERSUS** Govt. of KPK and others

WRIT PETITION

**APPLICATION FOR INTERIM RELIEF BY RESTRAINING THE
OFFICIAL RESPONDENTS TO NOT TAKE CHARGE FROM THE
APPELLANT TILL THE FINAL DISPOSAL OF THE INSTANT
WRIT PETITION.**

Respectfully Sheweth,

1. That contents of the instant application may please be considered as part and parcel of main Writ Petition.
2. That the Appellant has prima facie case & balance of convenience also tilts in favour of Appellant.
3. That if the interim relief is not granted, numerous complications will generate as well as the Appellant will suffer irreparable loss.
4. That in case the operation of impugned order dated 27/04/2020 is not suspended to the extent of Appellant and interim relief is not granted to the Appellant then Appellant will suffer irreparable loss and his service appeal will become in-fructuous.

It is, therefore, respectfully prayed that the application in hand may please be accepted as prayed for.

Humble Appellant

M. Shareef
Muhammad Shareef
Through Counsel

Muhammad Waqar Alam
Advocate High Court

AFFIDAVIT:

I, **Muhammad Waqar Alam** Advocate High Court, counsel for the Appellant, under the instructions of my client, do hereby solemnly affirm and declare on oath, that contents of the writ petition are true and correct to the best of my knowledge and belief; and nothing has been deliberately concealed from this Hon'ble Court.

Deponent

M. Shareef

OFFICE OF THE REGIONAL DIRECTOR OF
EDUCATION, FATA DIKHAN REGION BIKHAN.

APPOINTMENT ORDER:-

Consequent upon the Selection of the candidates made by the Selection Committee, the following GOV/SV/DM/PET (male/FEMALE) candidates of S.M Agency are hereby appointed in BPS-9(1605-97-3060 plus usual allowances as admissible to them under the rules, against the vacancies noted against each of their names in the interest of public Service w.e.f: their taking over charge is: 1.9.1999 OR afterwards.

S.No.	Merit orders	Name/Father's name.	Qualif:	Domacile.	Place of posting/Remar
1.	Open/1	Mohammad Abdullah s/o Salam Gul	JDPE	SWA	GMS, Kaza, Kach.
2.	Sess;/2	Jamil Ahmad s/o Rakhim Khan	JDPE	SWA	GMS, Shakarai.
3.	" /3	Mohammad Sharif s/o Masap Khan	JDPE	SWA	GMS, Dara Habat
4.	" /4	Mohammad Yameen s/o Shuja Alam	JDPE	SWA	GMS, Shakai.
5.	CC/1	Hafiz Ullah s/o Gulai Khan	JDPE/CC	SWA	GMS, Ahmad Gul K
6.	" /2	Noor Alam s/o Juma Khan	JDPE/CC	SWA	GMS, Zariwan
7.	SDPE/1	Inayat Ullah s/o Mir Daraz Khan	SDPE	SWA	GMS, Genra Haibt
8.	" /2	Amir Ullah s/o Atals Khan	SDPE	SWA	GMS, Tatai Dotan
9.	" /3	Awaj Ahmad s/o Sakhi Sarwar	SDPE/CC	SWA	GMS, Khan Kot
10.	JDPE/CC	Mohammad Karim s/o Jenat Khan	JDPE(Std)	SWA	GMS, Budinzai T
11.	" /2	Najeed Ullah s/o Atta Ullah	JDPE(Std)	SWA	GMS, Kot Kai.
12.	" /3	Fakr Mohammad s/o Jalat Khan	JDPE(Std)	SWA	GMS, Patwela
13.	Ex.S/M	Noor Zada s/o Sharaf Khan	Ex.S/M	SWA	GMS, Oss Pass.
14.	HPS/1	Shab Yar Khan s/o Gul Saleem	B.A/HPE	SWA	GMS, Tiazza.
15.	" /2	Shahzar Khan s/o Hafza Khan	M.A/HPE	SWA	GMS, Angoor Adda

ATTESTED
[Signature]

TERMS AND CONDITION.

1. Charge reports should be submitted in duplicate to all concerned.
2. NO/TA and DA is allowed on Ist: Appointment.
3. All the candidates should produce their health and age Certificate from M/S Agency Surgeon concerned within 7 days after their taking over charge.
4. These appointments are made purely on temporary basis and are liable to termination at any time without any notice Or assigning any reason. In case they want to resign their service they will have to give one month proper notice OR forfeit one month pay in lieu their of in favour of Govt.
5. Their original Certificates academic/Prof/NIC, Domicile, etc: should be produced before their taking over charge. After their Taking over charge too their monthly Salaries should not be drawn till the completion of their Testimonials from the quarter concerned, which is the responsibility of the DE. Their original Certificates should not be handed over charge if they are below 18 years OR above 33 years of age.
7. If they fail to take over charge within 15 days after the issue of this order then their appointment order will be considered as cancelled and this office may be informed accordingly, so that another candidate standing on merit be appointed.

- 8. The candidate knowledge in Islamic Education and Pakistan studies must be judged before handing over charge.
- 9. Probation period of the appointment will be 2 years as laid-down in Govt./Department.
- 10. The candidate/Candidates appointed against any vacancy erroneously conveyed by AEOs, as vacant which is occupied by incumbents who is either on leave of any kind suspended may not be handed over charge and this office be immediately informed through special messenger. In such cases the appointments of last candidate/Candidates will be treated as cancelled.
- 11. The untrained candidates will get fixed pay of the scale.
- 12. Discharge certificate of Ex-Service Men should be got verified from quarter concerned.
- 13. In case of PETs un-trained, their PA DMC should be got verified for HPE subject from the Board concerned.
- 14. The candidate/candidates who have rendered Govt. Afghan Refugee services are entitled for relaxation equal to their services period upto the maximum of ten years.

(MOHAMMAD ROSHAN KHAN)
Regional Director of Education,
FATA DIKhan

Endst: No. 2175-95, Dated DIKhan the 13-2 / 1999.

Copy of the above is forwarded for information and necessary action to:-

- 1. The Director of Education, FATA, NEFP, Peshawar.
- 2. The Agency Education Officers, S.W. Agency at Tank.
- 3. The Principal/Headmaster/Headmistress Concerned. Schools.
- 4. Candidate concerned.

[Signature]
Regional Director of Education
FATA DIKhan.

M. Tabir/

9-B



(PET(M))

- 9-A -

FATA SECRETARIAT
Directorate of Education

 Warsak Road Peshawar, Pakistan
 Phone: 091-9210166 Fax 091-9210216

No. _____/

dated ___/___/2017

Notification:

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Govt: of Pakistan Finance Division (Regulation Wing) Notification No.1 (32)R-1/2015-582/2016 dated 25.7.2016 Islamabad, SO (Edu) Notification No.FS/SO (Edu)/SSD/Up-Gradation/2882-94 dated 22.6.2016 and duly Endorsed by Directorate of Education FATA vide No.8233-60 dated 8.8.2016, the following PET (M) B-15 are hereby promoted to the post of Sr.PET (M) B-16 (Rs.15880-1280-54280) plus usual allowances as admissible under the rules on regular basis on terms and conditions given below with effect from 20.2.2013 and further they will be posted in the Govt: Higher Secondary / High Schools by the Agency Education Officer concerned against the newly upgraded Sr.PET BPS-16 posts.

Total No. of PET (M) Posts duly verified by the AAO	84
1/3 share of Senior PET Posts	28
Share of promotion 100%	28
Already promoted to B-16 SPET	Nil
No of Senior PET Posts available for promotion	28
Recommended for promotion to Sr. PET	25

Attested
ATTESTED

S#	Sen: No.	Name of Teacher	Name of School	D.O.Birth	D.O.Apptt: as regular	Remarks
1	3	KHAWZHLAT KHAN	GMS SINA TIZHA	14/06/1961	17/06/1989	Services placed at the disposal of AEO SWA for further posting.
2	4	JAHANGIR KHAN	GMS TRIKH TALAI	04/07/1966	09/01/1995	Services placed at the disposal of AEO SWA for further posting.
3	5	MUHAMMAD SALEEM	GMS DASHKA	01/03/1970	09/01/1995	Services placed at the disposal of AEO SWA for further posting.
4	6	SAID RAHMAN	GHSS ASHKAR KOT	03/03/1970	12/10/1995	Services placed at the disposal of AEO SWA for further posting.
5	7	DAUD JAN	GHS SPIN	04/04/1974	02/08/1995	Services placed at the disposal of AEO SWA for further posting.
6	8	MUHAMMAD AYUB KHAN	GHS SAID KHAN KOT	08/03/1968	28/10/1995	Services placed at the disposal of AEO SWA for further posting.
7	10	NAWAB SHAH	GMS NARGOSA	10/04/1968	27/02/1998	Services placed at the disposal of AEO SWA for further posting.
8	12	AMIR REHMAN	GHS SAM	20/04/1972	11/05/1999	Services placed at the disposal of AEO SWA for further posting.
9	14	HAFIZ ULLAH	GMS MOHAMMAD	03/03/1973	01/09/1999	Services placed at the disposal of AEO SWA for further posting.

9-B

10	16	AMIR ULLAH	GMS TATTI DOTANI	01/05/1974	01/09/1999	Services placed at the disposal of AEO SWA for further posting.
11	17	MUHAMMAD SHARIF	GMS DARA HAIBAT KHEL	02/03/1975	01/09/1999	Services placed at the disposal of AEO SWA for further posting.
12	18	INAYAT ULLAH	GMS DOAG	05/01/1978	01/09/1999	Services placed at the disposal of AEO SWA for further posting.
13	19	MUHAMMAD ABDULLAH	GMS POI KHEL SHAMIRAI	13/04/1976	01/09/1999	Services placed at the disposal of AEO SWA for further posting.
14	21	NEK MUHAMMAD	GHS SARAROGHA	02/02/1979	01/11/1999	Services placed at the disposal of AEO SWA for further posting.
15	22	NAJIB ULLAH	GMS DAB KOT WANA	11/05/1979	01/11/1999	Services placed at the disposal of AEO SWA for further posting.
16	24	AWAL AYAZ KHAN	GMS SULTAN KOT	08/02/1971	11/12/2000	Services placed at the disposal of AEO SWA for further posting.
17	25	MUHAMMAD RASOOL	GMS BADER BRIDGE NO.02	01/04/1955	31/03/2001	Services placed at the disposal of AEO SWA for further posting.
18	28	SAKHI JAN	GHS KARI KOT	02/05/1969	31/03/2001	Services placed at the disposal of AEO SWA for further posting.
19	29	NOOR ALI	GHS WANA	08/08/1969	31/03/2001	Services placed at the disposal of AEO SWA for further posting.
20	30	SHANAWAR KHAN	GMS TOOR RAGHZAI	15/04/1972	31/03/2001	Services placed at the disposal of AEO SWA for further posting.
21	31	SANGI MAR JAN	GMS OSS PASS	01/01/1974	31/03/2001	Services placed at the disposal of AEO SWA for further posting.
22	32	ABDUL JABAR	GMS KHAN KOT	01/03/1974	01/08/2001	Services placed at the disposal of AEO SWA for further posting.
23	33	NOOR ZADA	GHS LADHA	17/05/1970	31/03/2002	Services placed at the disposal of AEO SWA for further posting.
24	35	SHABYAR KHAN	GHS NANO	20/03/1980	31/03/2002	Services placed at the disposal of AEO SWA for further posting.
25	36	MUHAMMAD HUSSAIN	GHS CHAGHMALAI	1/1/1965	31/8/2002	Services placed at the disposal of AEO SWA for further posting.

Terms & Conditions:

1. They would be on probation for a period of one year, extendible for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded

29/3/17

REGISTERED

7. They will give an undertaking to be recorded in their Service Book to the effect that any over payment is made to her in the light this order will be recovered and if he/she is wrongly promoted, he will be reversed.

(Hashim Khan)
Director Education FATA

Endst: No. 9081-9/60 /File No.1/Promotion Senior CT B-16 dated 4/15/2017

Copy for information and necessary action is forwarded to the:

1. Accountant General (PR) Sub Office, Peshawar.
2. Agency Education Officer, SWa.
3. Agency Accounts Officer, SWA.
4. PS to additional Chief Secretary FATA.
5. PS to Secretary SSD, FATA.
6. PS to Secretary Finance FATA Secretariat.
7. PA Director Education, local Directorate.
8. Official concerned.
9. Master File.

ATTESTED

11
29/3/17
Addl: Director (Estab)
Directorate of Education, FATA

9-c

Roll No. $\frac{GU}{2}$ 003467

Annexure: "B" -10-

GOMAL UNIVERSITY



DERA ISMAIL KHAN
(N.W.F.P PAKISTAN)

DETAILED MARKS CERTIFICATE
SENIOR DIPLOMA IN PHYSICAL EDUCATION 2ND TERM

Examination Held in August 2005 / Annual

Session: 2004-2005

Roll No: 585

Name: Muhammad Sharif

The candidate secured the following marks & has been placed in First Division

SUBJECTS	Total Number of Marks Allotted	MARKS OBTAINED	
		In figures	In words
Health Education	100	41	Forty One only
Track and Field	100	71	Seventy One only
Science of Movement	100	40	Forty only
Athletics	100	75	Seventy Five only
Techniques of Games	100	75	Seventy Five only
Gymnastics	100	75	Seventy Five only
Teaching Practice	100	94	Ninety Four only
Project	50	46	Forty Six only
Aggregat of 1st Term	300	137	One Hundred and Thirty Seven only
Total Marks	1050	654	Six Hundred and Fifty Four only

Result declaration date: 15/12/2005

ATTESTED
[Signature]

[Signature]
Controller of Examinations
Gomal University D.I.Khan.

Serial No. GU 00433
2

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

-11-

GOMAL UNIVERSITY

DERA ISMAIL KHAN

(N.W.F.P)

PAKISTAN



ATTESTED
[Signature]

(Session 2004-2005)

MUHAMMAD SHARIF KHAN.

SON of

MASAF KHAN.

LAWAGHAR ACADEMY OF EDUCATION & RESEARCH, KARAK (FYI)

and a student of the Department of Health and Physical Education,

Gomal University having passed the prescribed examination in

AUGUST, 2005

19

, is this day admitted by the Gomal

University to the

Senior Diploma in Physical Education

in the FIRST Division, is qualified to supervise Physical Education and to teach this subject in Colleges and Schools.

The Examination was taken as a whole/in parts

Date of Birth 2-3-1975

(MARCH SECOND N.H.A SEVENTY FIVE)

Registered No. 1626-T-96

Roll No. 585

RESULT DECL. ON:

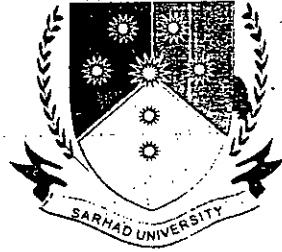
NOVEMBER 21, 19 2005

Countersigned

[Signature]

Registration No. SUT-07-01-60095

Serial No. 020904



18-1

Sarhad University of Science & Information Technology

This is to certify that Muhammad Sharif Khan son/daughter of Masip Khan

Having passed the requisite examination, is hereby awarded the degree of

Master of Health & Physical Education

With all the rights and privileges appertaining thereto.

Given at Peshawar (PAKISTAN) on the Twenty Fifth Day of October Two Thousand Ten.

ATTESTED
[Signature]

[Signature]

Registrar

[Signature]

Vice Chancellor



[Signature]

President

Nº 001819

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

GOMAL UNIVERSITY

DERA ISMAIL KHAN.



INTER COLLEGES SPORTS TOURNAMENTS

SESSION 1992-93

CERTIFICATE

Name

MR. MUHAMMAD SHARIF

S/o - D/o

MR. MASAP KHAN

Institution

GOVERNMENT COLLEGE TANK

Game / Event

BASKETBALL

Position

WINNER

Time / Distance / Height

Date 19/1/93

PRESIDENT
G.U.S.T.C.

SECRETARY
G.U.S.T.C.

ATTESTED
[Signature]

Annexure 'C'

DIRECTORATE OF EDUCATION, FATA SECRETARIAT, PESHAWAR

TRANSFER

-14-

Mr. Muhammad Sharif PET Govt: Middle School Dara Haibat Khel South Waziristan Agency is hereby transferred in his own pay & scale to the Agency Education Office (SWA) against the vacant post vacated by Mr. Noor-Ul-Amin Supervisor who is due for retirement on 3-12-2016.

Note:-

- 1 Charge report should be submitted to all concerned.
- 2 TA/DA etc is not allowed

DIRECTOR EDUCATION (FATA)

Endst: No. 15558-61 /A-12/

Dated Pesh: the 30/11 /2016

Copy forwarded to the:-

- 1 Agency Education Officer South Waziristan Agency.
- 2 Agency Accounts Officer South Waziristan Agency.
- 3 PS to Secretary SSD FATA.
- 4 PA to D.E FATA


 DY: DIRECTOR (ESTAB)

(Jahangir)

ATTESTED


OFFICE OF THE AGENCY EDUCATION OFFICER, SOUTH WAZIRISTAN AGENCY, TANK

CHARGE REPORT

Certified that I have on this day 06-12-2016 (A/F Noon) take over Charge of vacant post of Agency Physical Supervisor at Agency Education Office, S.W.Agency, Tank vide Dy: Director (Estab.), Directorate of Education, FATA, Peshawar
Endst: No.15558-61 Dated 30.11.2016.

Signature of relieving
Govt Officer
Designation

M. Shari
Muhammad Shari
PET

Station: AEO, SWA, Tank
Dated: 06-12-2016.

Signature of relieved
Govt Officer
Designation

Vacant Post
Physical Supervisor

Station: AEO, SWA, Tank
Dated: 06-12-2016.

Endst: No. 3871-75
Copy to the:-

Dated 6/12 2016.

1. Director of Education, FATA Secretariat, Peshawar.
2. Political Agent, S.W.Agency at Tank.
3. Agency Accounts Officer, S.W.Agency, Tank.
4. Superintendent local office.
5. Official concerned.

ATTESTED
[Signature]

[Signature]
Agency Education Officer
S.W.Agency, Tank
[Signature]

Annexure "D" -16-

BETTER COPY
DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.

Notification:

The transfer of the following SST/SPET and CT are hereby ordered with effect from the date of their taking over charge in the Schools/ Office as noted against each in the interest of public service.

S: No.	Name & Designation	Remarks
1.	Mr. Hayyat Ullah SST GMS Nargosa District South Waziristan	AVP
2.	Mr. Kifayat Ullah CT GHSI Warzikai Tehsil Ladha District South Waziristan.	Vice S No. 3
3.	Muhammad Sharif SPET Physical Supervisor Office of the District Education Officer South Waziristan.	Against vacant Sr FET Post.

Note:

1. Charge report should be submitted to all concerned.
2. TA/DA etc. is not allowed.

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

Endst No. 4491-95/ A-12, Hayyat Ullah Dated Pesh the 27-04-2020

Copy forwarded to the;

1. District Education Officer South Waziristan.
2. District Account Officer South Waziristan.
3. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. Teacher concerned.
5. P/Files.

ATTESTED
[Signature]

DY: DIRECTOR (ESTAB)
MERGED DISTRICTS

DEPARTMENT OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR

-17-

Sr	Name/Designation	Posted at	Remarks
1	M. M. Khan Sr. PS M. M. Khan District South Waziristan M. Khatun U.S. ET GMC Warzika Tehsil Ladha District South Waziristan	ANCO(M) Office of the District Education Office, South Waziristan Physical Supervisor Office of the District Education Office South Waziristan (on his own pay & scale)	
3	Muhammad Sharif SPET Physical Supervisor Office of the District Education Office South Waziristan	Services placed at the disposal of DEO South Waziristan for further adjustment	Against vacant Sr PET post

NOTE -
Charge sheet should be submitted to all concerned
officers & not allowed

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar

Encl. No. A-17 Hayat Ullah Dated Pesh. the 15/11/2020

- 1. Copy forwarded to the
- 1. District Education Officer South Waziristan
- 1. District Accounts Officer South Waziristan
- 3. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar
- 1. Teachers concerned
- 5. P/Files

ATTESTED
[Signature]

BY: DIRECTOR (ESTAB)
MERGED DISTRICTS

BETTER COPY

DIRECTORATE OF THE ELEMENTARY & SECONDARY
EDUCATION KPK, PESHAWAR

Notification:

The transfer of the following SST and CT are hereby audit with effect from the date of their taking over charge in the School/ office as noted against each in the interest of public service.

S. No.	Name/ Designation	Posted at	Remarks
1	Mr. Kifayat Ullah CT, ADEO Male at office of the District Education Office SWA	GHS Warzakai Tehsil Ladha District SW	AVP
2	Mr. Abdur Rasheed SST, GMS, Tanai, Wana District SW.	ADEO Male at office of the District DEO SW on his OPS	Vice Serial No. 01

Note:

1. Charge report should be submitted be to all concerned.
2. T:A/ D.A: etc are not allowed.

Director
Elementary & Secondary Education
KPK, Peshawar.

Endst No. 4237-41

dated: 02-04-2020

Copy forwarded to:

1. DEO SW
2. DAO SW
3. PA to Directorate of Elementary and Secondary Education KPK, Peshawar.
4. Teacher Concerned
5. Personal File

Deputy Director
Establishment, merged Districts,
KPK, Peshawar.

[Handwritten Signature]
ATTESTED

DIRECTOR

PAKHTUNKHWA

PESHAWAR

PAKHTUNKHWA PESHAWAR

Notification

19

The transfer of the following SST and CT are hereby ordered with effect from the dates of their taking over charge in the schools/Office as noted against each in the interest of public service:

S/N	Name/Designation	Posted at	Remarks
1	Mr. Kifayat Ullah CT AEO (M) at Office of the District Education Officer South Waziristan	GHS Warzikal Tehsil Ladha District South Waziristan	AVP
2	Mr. Abdur Rashid SST GMS Tana Wana District South Waziristan	AEO (M) at Office of the District Education Officer South Waziristan (on his own pay & scale)	Vice S No

NOTE:

1. Charge report should be submitted to all concerned
2. TA(D), etc is not allowed

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa

Endst No. 237-111
A. U. Abdur Rashid Dated Pesh. the 2/11/2012

1. Copy forwarded to the
1. District Education Officer South Waziristan
2. District Accounts Officer South Waziristan.
3. PA to Director Elementary and Secondary Education Khyber
Pakhtunkhwa, Peshawar
4. Teachers concerned
5. P/Files

ATTESTED
[Signature]

BY: DIRECTOR (ESTAB)
MERGED DISTRICTS
[Signature] 2/11/2012

FOR
senth
11/11/12

BEFORE THE HONOURABLE PESHAWAR HIGH COURT

BENCH DERA ISMAIL KHAN

Writ Petition No. 394 / 2020



Muhammad Shareef, S/o Masab Khan Presently working and posted as PET against the post of Physical Supervisor under the control of District Education Officer South Waziristan Tribal District South Waziristan.

Cell# 0344-8391474

..... Petitioner

VERSUS

1. Government of KPK, through Secretary Education S&L Khyber Pakhtunkhwa Peshawar.
2. Director E&S Khyber Pakhtunkhwa Pesahawar.
3. District Education Officer (Male) South Waziristan.
4. District Agency Office SWTD.
5. Mr. Kifayat Ullah CT, Teacher presently posted at GHS Warzikai Tehsil Ladha District South Waziristan.

..... Respondents

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF THE ISLAMIC REPUBLIC OF PAKISTAN 1973.

Respectfully Sheweth;

Petitioner humbly submits and request as under:-

- That addresses of the parties are sufficient for the purpose of service.
- 1. That the petitioner was inducted as PET, Male Teacher against the vacant in the official respondent's office vide appointed order No. 275-95 dated: 10-07-1999. Copy of the appointment order is enclosed as **Annexure A**.

[Handwritten Signature]
District Accounts Officer
S.W.T.D at Tank

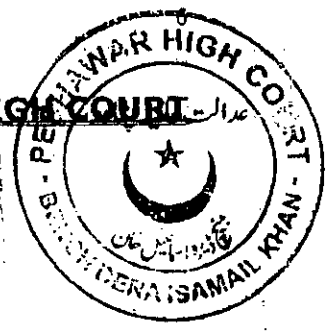
145

ATTESTED
[Handwritten Signature]

ATTESTED
12-05-20
T. J. AMINOR
Peshawar High Court Bench,
Dera Ismail Khan

"E" -21-

BEFORE THE HONOURABLE PESHAWAR HIGH COURT
BENCH DERA ISMAIL KHAN



CM No. _____ 2020

In Writ Petition No. _____ / 2020

Muhammad Shareff **VERSUS** Govt. of KPK and others

WRIT PETITION

APPLICATION FOR INTERIM RELIEF BY RESTRAINING THE OFFICIAL RESPONDENTS TO NOT TAKE CHARGE FROM THE PETITIONER TILL THE FINAL DISPOSAL OF THE INSTANT WRIT PETITION.

Respectfully Sheweth,

1. That contents of the instant application may please be considered as part and parcel of main Writ Petition.
2. That the Petitioner has prima facie case & balance of convenience also tilts in favour of Petitioner.
3. That if the Interim relief is not granted, numerous complications will generate as well as the Petitioner will suffer irreparable loss.
4. That in case the operation of impugned order dated 27/04/2020 is not suspended to the extent of Petitioner and interim relief is not granted to the Petitioner then Petitioner will suffer irreparable loss and his service appeal will become in-fructuous.

It is, therefore, respectfully prayed that the application in hand may please be accepted as prayed for.

M. Shareef Khan

Humble Petitioner

Muhammad Sahreef
Through Counsel

Muhammad Waqar Alam

Muhammad Waqar Alam
Advocate High Court

AFFIDAVIT:

I, **Muhammad Waqar Alam** Advocate High Court, counsel for the petitioner, under the instructions of my client, do hereby solemnly affirm and declare on oath, that contents of the writ petition are true and correct to the best of my knowledge and belief; and nothing has been deliberately concealed from this Hon'ble Court

Muhammad Waqar Alam
Deponent

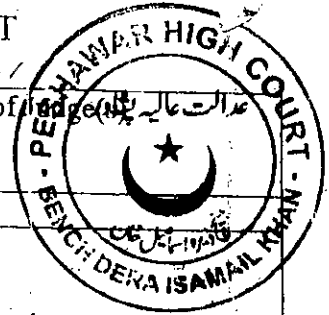
Muhammad Waqar Alam
ATTESTED

Muhammad Waqar Alam
ATTESTED
EXAMINOR
Peshawar High Court Bench,
Dera Ismail Khan

PESHAWAR HIGH COURT, D.I. KHAN BENCH

Annex "F"

FORM OF ORDER SHEET



Date of Order or proceedings (1)	Order or other proceedings with signature of Judge (عزت عالیہ)
11.5.2020	<p>(2)</p> <p><u>W.P.No. 394-D/2020 with</u> <u>C.M.No.397-D/2020</u></p> <p>Present: Muhammad Waqar Alam, Advocate for petitioner.</p> <p>***</p> <p>Pre-admission notice be issued to the other side for the date fixed. Meanwhile, status quo be maintained. Adjourned to a date in office.</p> <p style="text-align: right;">(A) S <u>JUDGE</u></p> <p style="text-align: right;">S <u>JUDGE</u></p> <p>1799</p> <p>G.R.No. _____</p> <p>Application Received on <u>11-05-2020</u></p> <p>Copy fee deposited Rs. _____</p> <p>No. of Pages <u>03</u></p> <p>Copy Fee <u>04</u></p> <p>Urgent Fee <u>120</u></p> <p>Total Fee _____</p> <p>Copy ready for delivery <u>12-05-2020</u></p> <p>Copy delivered on <u>12-05-2020</u></p> <p>Signature of Examiner _____</p> <p><u>12-05-2020</u></p> <p>(D.B) Hon'ble Mr. Justice Abdul Shakoor Hon'ble Mr. Justice Sahibzada Asadullah</p>

Hasnain*

ATTESTED

Certified to be true copy
Peshawar High Court Bench Dera Ismail Khan
Authorized Signatory
Qasim Shahid

بخدمت جناب سیکرٹری ایلمنٹری اینڈ سیکنڈری ایجوکیشن پشاور خیبر پختونخواہ

حکمانہ اپیل برخلاف قلم آفس آرڈر نمبر 12-4491/95/A-2020 مورخہ: 27-04-2020 صدرال

ازال جناب ڈائریکٹر ایلمنٹری اینڈ سیکنڈری ایجوکیشن پشاور خیبر پختونخواہ۔

جناب عالی: من مائل ایپلانٹ حسب ذیل عرض رساں ہوں۔

1۔ یہ کہ من سائل بروئے آرڈر نمبر 95-2175 مورخہ: 10-07-1999 کو بطور فزیکل ایجوکیشن ٹیچر بھرتی ہوا اور محکمہ ریجنل ڈائریکٹر آف ایجوکیشن فانا ڈیرہ انما میل خان میں بطور فزیکل ایجوکیشن با اس طریقہ سے فرائض منصبی ادا کرتا چلا آ رہا ہوں جب کہ من سائل اب بطور سینئر فزیکل ایجوکیشن ٹیچر بن چکا ہوں اور گزشتہ مورخہ: 30-11-2016 کو بحکم ڈائریکٹر ایجوکیشن فانا کے آرڈر نمبر 61-15558 خالصی کے برخلاف بطور فزیکل سپروائزر فز ایجوکیشن آفس ساؤتھ وزیرستان ٹرائل ڈسٹرکٹ میں اپنے فرائض منصبی با احسن طریقہ سے ادا کرتا چلا آ رہا ہوں اور من سائل سینئر فزیکل ایجوکیشن ٹیچر ہونے کی بنیاد پر اور دیگر ضروری لوازمات جو کہ جوئرز ڈپلومہ ان فزیکل ایجوکیشن کے علاوہ سینئر ڈپلومہ ان فزیکل ایجوکیشن، ماسٹران ایجوکیشن ٹیچر، سپورٹس ٹیوٹنٹ جاری کردہ گولڈ یونیورسٹی بھی رکھتا ہے جب کہ اچانک من سائل کی آسامی کے برخلاف ایک مینڈ آرڈر صدرہ ازال ڈائریکٹر ایلمنٹری اینڈ سیکنڈری ایجوکیشن خیبر پختونخواہ نے مورخہ: 27-04-2020 کو جاری کرتے ہوئے من سائل کو اپنی مستقل پوسٹ سے ہٹا کر ایک کفایت اللہ نامی شخص کو من مائل کی آسامی پر ٹرانسفر کر دیا ہے جو کہ سراسر خلاف قانون ہونے کے ساتھ ساتھ سیاسی بنیادوں پر عمل میں لایا گیا ہے جس کو من سائل بذریعہ اپیل ہذا چیلنج کرتا ہوں اور وجوہات اپیل درج ذیل ہیں۔

وجوہات اپیل:

1۔ یہ کہ حکم مورخہ: 27-04-2020 صدرہ ازال ڈائریکٹر ایلمنٹری اینڈ سیکنڈری ایجوکیشن قانون کے خلاف ہونے کے ساتھ ساتھ قدرتی انصاف کے اصولوں کے بھی خلاف ہے کیونکہ من سائل سینئر فزیکل ایجوکیشن ٹیچر ہونے کی بنیاد پر فزیکل سپروائزر سال 2016 سے ایجوکیشن آفس میں فرائض منصبی ادا پنے کیڈر کے اندر رہ کر سرانجام دیتا چلا آ رہا ہوں جب کہ بروئے حکم مورخہ: 27-04-2020 ڈائریکٹر صاحب نے بغیر کسی Proposal کے من مائل کی آسامی ایک نا اہل شخص کو صرف سکول ٹیچر ہونے کی بنیاد پر کسی سکول میں تعلیم

ATTESTED
[Signature]

دینے کا پابند و ذمہ دار ہیں لیکن سی ٹی ٹیچر کا بھائی عرفان اللہ محمود جو کہ ڈپٹی سیکرٹری ایجوکیشن کے عہدہ پر رہ چکا ہے اس کی ایام پر ایک سی ٹی ٹیچر کو پہلے بروئے حکم مورخہ: 02-04-2020 اسٹنٹ ڈسٹرکٹ ایجوکیشن آفیسر میل تعینات کیا گیا لیکن جس جگہ پر تعیناتی ہوئی اس جگہ کے لوگوں نے احتجاج کیا اور اس احتجاج کی بناء پر وہ آرڈر واپس لے لیا جو کہ اس بات کا واضح ثبوت ہے کہ کفایت اللہ سی ٹی ٹیچر نہایت اثر و رسوخ رکھنے والا شخص ہے اور وہ اپنے کیڈر میں ڈیوٹی سرانجام دینے کی بجائے کسی بھی دیگر کیڈر میں اپنے آپ کو غیر قانونی طور پر Adjust کرانے کی صلاحیت رکھتا ہے جو کہ ایجوکیشن آفس کے لیے بولہ فکر یہ ہے۔

۲۔ یہ کہ من سائل فی ریکل سپروائزر کی آسامی پر درست و صحیح طور پر کام کر رہا تھا لیکن سیاسی بنیادوں پر اور سفارش کچھ کی بنیاد پر من سائل کو بغیر کسی قانونی وجہ کے اور شہزادی کا موقع دیے بغیر اپنی مستقل آسامی سے ٹرانسفر کرنا غیر قانونی عمل ہے بدیں اجماع مورخہ: 27-04-2020 قابل منسوخی ہونے کے ساتھ ساتھ کالعدم قرار دیا جانا ضروری ہے۔

لہذا استدعا ہے کہ بمظوری اپیل ہذا حکم مورخہ: 27-04-2020 کو کالعدم قرار دیا جائے اور من سائل کو فی ریکل سپروائزر کی اپسٹ پر دوبارہ مستقل Adjust کرنے کی نسبت حکم صادر فرمایا جاوے تاکہ انصاف کے تقاضے پورے ہو سکے۔

مورخہ: 07/05/2020

محمد شریف ولد مصعب خان اہم محسود فی ریکل سپروائزر
محکمہ AEO آفس ساؤتھ وزیرستان ٹرانزائل ڈسٹرکٹ At ٹانک
M. Shalikh Khan

03.44.83

ATTESTED

RGL1261.1200 se. Rs. 600
Stamps affixed except in case of unsecured letters of not more than the initial weight prescribed in the Post Office Guide 6 on which no acknowledgment is due
Date-Stamp
*Write here "letter", "parcel" or "packet" with the word "insured" before it when necessary.
(in figures) (in words)
Weight } Kilo
Rs. Ps. (in words) } Grams
75

BETTER COPY

KHYBER PAKHTUNKHWA

Published By Authority

PESHAWAR, FRIDAY, 23RD FEBRUARY, 2018

**GOVERNMENT OF N.W.F.P
EDUCATION DEPARTMENT**

NOTIFICATION

Dated: 8th October, 1994

No. SO (S)6-2/90/1. In pursuance of the Provision contained in sub rule (2) of rule 3 of the North West Frontier Province Civil Servants (Appointment Promotion and Transfer Rules, 1989, the Education Department in consultation with the Service & General Administration Department and the Finance Department hereby lays down the method of recruitment, qualification and other conditions specified in column 3 to 6 of the appendix to the notification which shall be applicable to posts specified in column 2 of the

**SECRETARY TO GOVT OF NWFP
EDUCATION DEPARTMENT**

[Handwritten Signature]
ATTESTED

ATTESTED

Sr. NO	Nomenclature of post	Minimum qualification for appointment by initial recruitment or by transferred	Minimum for appointment by promotion	Age limit	Method of recruitment
1	Principal Government College of Physical Education BS-18				By promotion on the basis of Seniority cum fitness from amongst the Assistant Directors PH & Sports & Lecturer Government College of Physical Education having 7 years service in the respective section.
2	Assistant Director Physical Education & Sports, Lecturer BS-17	M. Sc in Physical Education from recognized University.	---	25-30 Male 21-40 Female	85% by promotion on the basis of seniority cum fitness from amongst Director Physical Education Government High Secondary High School/ Lecturers, Collage and Assistant District Education Officer having 7 years service as such and 15% by initial recruitment.
3	Director Physical Education GHS, Schools/ Elementary Collages & Assistant ADEO Physical BS-16	BA/ BSC from recognized University with SDPE, from recognized collage.	---	21-30 Male 21-40 Female	60% by promotion on the basis of seniority cum fitness from amongst the Physical Supervisor with two years service as such and 40% by initial recruitment.
4	Physical Supervisor BS-15	BA/ BSC from recognized University with SDPE, from recognized collage.		18-30 Male 18-40 Female	50% by promotion on the basis Seniority cum fitness from amongst the Physical Education Teachers with SDPE & having 5 years service as such & 50% by initial recruitment.
5	Physical Education Teacher BS-09	FA/ FSC with JDPE, of training in EH Physical Education from TAKYA Training Centre.		21-30 Male 21-40 Female	By initial recruitment.

— 26 —

EXTRAORDINARY
GOVERNMENT



KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, FRIDAY, 23RD FEBRUARY, 2010

GOVERNMENT OF N.W.F.P.
EDUCATION DEPARTMENT

NOTIFICATION
Dated 18th October, 1994

No. 50(S)16-2/94. In pursuance of the Provisions contained in sub-rule (2) of rule 10 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1954, the Education Department in consultation with the Services Commission, Government of North-West Frontier Province and the Finance Department, hereby lays down the method of recruitment, qualification and other conditions specified in column-3 to 6 of the Annexure to this Notification which shall be applicable to posts specified in column-2 of the Annexure.

SECRETARY TO GOVT OF NWFP
EDUCATION DEPARTMENT

[Handwritten Signature]
ATTESTED

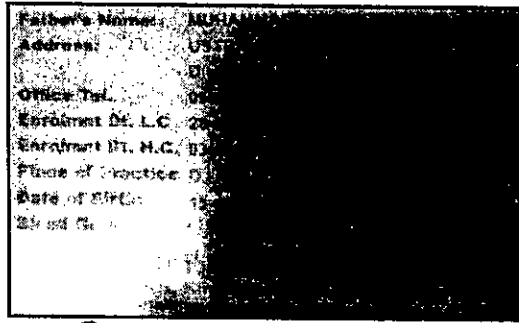
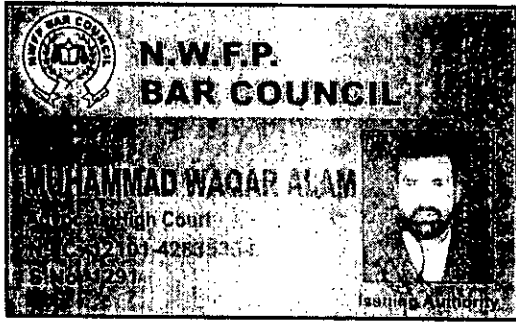
1145

Sl. No.	Name of post	Minimum Qualification for appointment of post as recommended by board	Minimum for promotion	Age limit	Mode of recruitment
1	Principal Government College of Physical Education (BS-18)	M. Sc. in Physical Education from a recognized University		Male 21-30 Years Female 21-40 Years	a) Direct recruitment by advertisement b) Promotion from below
2	Assistant Director Physical Education and Sports Lecturer (BS-17)	B. A/B. Sc from a recognized university with Senior Diploma in Physical Education from a recognized college		Male 21-30 Years Female 21-40 Years	a) Direct recruitment by advertisement b) Promotion from below
3	Director Physical Education Govt. Higher Secondary Schools/Elementary Colleges and Assistant Dir. Education Officer (Physical) (BS-16)	B. A/B. Sc from a recognized university with Senior Diploma in Physical Education		Male 18-30 Years Female 19-40 Years	a) Direct recruitment by advertisement on the basis of seniority-cum-merit among the Physical Education Teachers with senior Diploma in Physical Education and having five years service as per rules b) Fifty percent by initial recruitment
4	Physical Supervisor (BS-15)	F. A/F. Sc with up to Diploma in Physical Education		Male 21-30 Years Female 21-40 Years	Direct recruitment
5	Physical Education Teacher (BS-9)	F. A/F. Sc with up to Diploma in Physical Education		Male 21-30 Years Female 21-40 Years	Direct recruitment

ATTESTED


 Officer

وکالت نامہ



بعدالت جناب KPK Service Tribunal Resharwar.
 Appellant مخانب
Muhammad Shant نام Court of KPK.
 دعویٰ یا جرم SERVICE Appeal
 تفصیل دعویٰ یا جرم _____

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بیروی وجود ہی برائے پیشی یا تصفیہ مقدمہ بمقام D. Khan کیلئے
 محمد وقار عالم ایڈووکیٹ ہائی کورٹ

کو حسب ذیل شرائط پر وکیل مقرر کی ہے، کہ ہر پیشی پر خود بذریعہ مختیار خاص رو برو عدالت حاضر ہوتا رہوں گا۔ اور ہر وقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا، اگر پیشی پر مظہر حاضر نہ ہوا، اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا، تو صاحب موصوف اسکے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیروی کرنے کے ذمہ دار نہ ہوں گے۔ اور مقدمہ صدر پکھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا بیان دہاں کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخلہ صاحب موصوف مثل کردہ ذات خود منظور و قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ یا جواب دعویٰ یا درخواست اجرائے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کرانے اور ہر قسم کا رویہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر ثالثی یا راضی نامہ و فیصلہ پر حلف کرنے، اقبال دعویٰ کا بھی اختیار ہوگا، اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مذکورہ بیرون از پکھری صدر بیروی مقدمہ مذکورہ نظر ثانی و اپیل و نگرانی و برآمدگی مقدمہ یا منسوخی ڈگری کی طرف یا درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از فیصلہ اجرائے ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ جتانہ بیروی کا اختیار ہوگا اور تمام ساختہ پر داخلہ صاحب موصوف مثل کردہ ذات خود منظور و قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو کی کاروائی یا بصورت درخواست نظر ثانی اپیل یا نگرانی یا دیگر معاملہ مقدمہ مذکورہ کسی دوسرے وکیل یا بیرسٹر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں، اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ایسے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور وہ ان مقدمہ میں جو کچھ ہر جات التواء پڑیگا، وہ صاحب موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ کسی مقدمہ کی بیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے۔ تاکہ سند رہے

مورخہ _____ ماہ _____ 20 _____ Accepted

مضمون وکالت نامہ سن لیا ہے۔ اور اچھی طرح سمجھ لیا ہے۔ ہے اور منظور ہے۔

العبد _____ العبد _____ العبد _____

محمد وقار عالم ایڈووکیٹ ہائی کورٹ

M. Shabir Akbar

**BEFORE THE HONORABLE SERVICE TRIBUNAL CAMP COURT DERA
ISMAIL KHAN .**

Service appeal No.11146/2020.

Muhammad SharifAppellant.

Versus

***Secretary Elementary & Secondary Education Department Khyber
Pakhtunkhwa & others.....Respondents***

Comments on behalf of Respondent No. 2.

Preliminary objections.

- *That the appellant has got no cause of action, locus standi to file the instant appeal.*
- *That the appellant has not come to this tribunal with clean hands.*
- *That the appeal is not maintainable in the present form.*
- *That the appellant is estopped by his own conduct to bring the instant appeal.*
- *That the appeal is badly time barred.*
- *That under Section-10 of the Civil Servants Act 1973, the appellants is liable to serve anywhere.*
- *That the appellant has concealed material facts from the Honorable Service Tribunal.*

ON FACTS.

1. *That para-1 needs no comments.*
2. *That performance of duty with honesty and enthusiasm is the duty of every servant.*
3. *That para-3 is correct, hence needs no further comments.*
4. *That the transfer has been made in the interest of Public Service.*
5. *Legal, the Respondent Department also submits on following grounds inter alia.*

GROUND.

- A. *Incorrect and not admitted, the appellant has been treated as per rules and policy in-vogue.*
- B. *That the appellant has no concern with the adjustment of an employee, it is the discrete of the Competent Authority to utilize the services of an employee for better performance in the interest of Public Service.*
- C. *Incorrect and denied, the transfer has been made in the interest of Public Service.*
- D. *Incorrect and denied, detail reply has already been submitted under para-4 on grounds.*
- E. *Correct to the extent that the private respondent is CT Teacher and he has been given additional charge of the post of Physical Supervisor, while the appellant is serving as Physical Education Teacher and service rules of Physical Supervisor attached as (Annexure-A).*
- F. *Incorrect and denied, the department has acted according to the Law/ Rules and Policy.*

G. Incorrect and denied, the department has acted according to the Law/ Rules and Policy.

H. That this ground needs no comments.

I. Respondents also seek permission of Honorable Tribunal to produce additional grounds at time of hearing.

Prayer:

In the light of the above stated facts, it is requested to dismiss the case of the appellant.

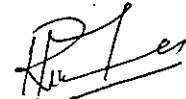


Director

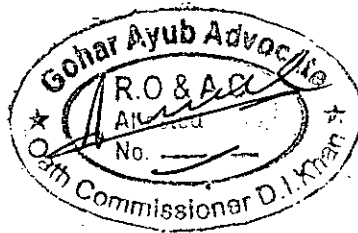
Elementary & Secondary Education Department
(Merged Areas) Respondent No. 2

AFFIDAVIT ✓

I do hereby declare and affirm that the above comments are true and correct to the best of my knowledge and thereof noting has been concealed from this Honorable Tribunal.



Litigation Officer
District South Waziristan



GOVERNMENT OF N.W.F.P.,
EDUCATION DEPARTMENT.NOTIFICATION.

NO.SO(S)6-2/90/I. In pursuance of the provisions contained in sub-rule(2) of rule 3 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Education Department, in consultation with the Services & General Administration Department and the Finance Department, hereby lays down the method of recruitment, qualifications and other conditions specified in columns 3 to 6 of the Appendix to this Notification which shall be applicable to posts specified in column 2 of the said Appendix.

SECRETARY TO GOVT. OF NWFP
EDUCATION DEPARTMENT.

Encls: No.SO(S)6-2/90/I. Dated Peshawar, the 18th Oct., 1990

Copy forwarded to the:-

1. Secretaries to Govt. of NWFP S&GAD, Finance & Law Department.
2. Director of Secondary Education NWFP Peshawar.
3. All Divisional Directors Education in NWFP.
4. Manager Government Printing Press NWFP Peshawar.
5. Accountant General NWFP Peshawar.

Attested
Na

(MUHAMMAD ILIAS)
Section Officer (Schools)

Ali
Deputy Director
Schools & Literacy
N.W.F.P. Peshawar.

Ali

Annex A

APPENDIX

Sr.#	Nomenclature of post	Minimum Qualifications for Appointment by initial recruit or by transfer.	Minimum for appointment by Promotion.	Age limit	Method of recruitment
1	2	3	4	5	6
1	Principal Government College of Physical Education				By Promotion, on the basis of seniority cum fitness, from amongst the Assistant Directors Physical Education and Lecturers of Physical Education having seven years service in the respective sections
2	Assistant Director Physical Education and Sports/Lecturers Govt. College of Physical Education	M.Sc.in Physical Education from a recognised University		Male 21-30Years Female 21-40Years	a). Eighty five percent by Promotion on the basis of seniority-cum-fitness, from amongst Directors Physical Education Government Higher Secondary Schools/Elementary Colleges and Assistant Distt: Education Officer(Physical) having five years service as such and b). Fifteen percent by initial recruitment.
3	Director Physical Education Govt; Higher secondary schools/Elementary colleges and Assistant Distt: Education Officer(Physical).	B.A /B.Sc fi from a recognised university with senior Diploma in Physical Education from a recognised college		Male 21-30Years Female 21-40Years	a). Sixty percent by Promotion, on the basis of seniority-cum-fitness, from amongst the Physical Supervisors with two years service as such and b). Forty percent by initial recruitment.
4	Physical Supervisor.	B.A /B.Sc from a recognised university with senior Diploma in Physical Education.		Male 18-30Years Female 18-40Years	a). Fifty percent by promotion, on the basis of seniority-cum-fitness from amongst the Physical Education Teachers with senior Diploma in Physical Education and having five years service as such and b). Fifty percent by initial recruitment.
5	Physical Education Teachers.	F.A/F.Sc with junior Diploma in Physical Education/Certificate of training in phy: Education from TAKYA..... TRAINING CENTRE.		Male 21-30Years Female 21-40Years	By initial recruitment.

Attested
[Signature]

[Signature]
Deputy Director
Schools & Literacy
N.W.F.P. Peshawar.

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BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL CAMP COURT DERA ISMAIL KHAN

In Service appeal No. 11146 of 2020

Muhammad Sharif Versus Govt. of KPK and others

REPLY ON BEHALF OF RESPONDENT# 04

Respectfully Shewith:

Respondents ~~No 4~~ humbly submits as under,

PRELIMINARY OBJECTION:-

1. That the petitioner has no cause of action and locus standi against the replying respondent.
2. That petitioner has not come to this Honourable Court with clean hands.
3. That the service appeal of the appellant is not maintainable in its present form, hence, the same is liable to be dismissed.
4. That the instant service appeal of the petitioner is based on malafide having no legal footings, hence, is liable to be dismissed without further proceeding.
5. That the petitioner is not entitled for the relief which he is claiming in the instant service appeal.
6. That no proper remedy has been acquired by the appellant and only on this sole ground, the instant service appeal is liable for dismissal.

OBJECTION ON FACTS:-

1. That para No: 1 of the appeal of the appellant is correct and it is further stated that the appellant is now performing his duties against the post of Physical Supervisor (BPS-15) under control of replying respondents since 2015. Actually the appellant is senior Physical Education Teacher in the department and also upgraded in BPS-16.

That para No. 2 of the appeal pertains to record of the appellant's service, hence, no reply.

3. That Para No. 3 of the appeal of the appellant is correct.
4. That Para No. 4 of the appeal of the appellant is partially correct because the private respondent Mr. Kifayatullah was adjusted/transferred against the post of Physical Supervisor vide order of the competent officer, hence, he also performed his duties in the office of respondents but withdraw his salaries from C.T cadre post.
5. That Para No. 5 of the appeal is correct.
6. That para No. 6 of the appeal is incorrect, no such departmental appeal was made to the competent authority burden of proof lies upon the shoulders of appellant.
7. That Para No. 7 of the appeal is incorrect and misconceived. Detail reply is given in above paras.

REPLY ON GROUNDS:-

- i. That ground (a) of the appeal is incorrect, hence denied.
- ii. That ground (b) of the appeal of the appellant is correct to the extent of order dated 02/04/2020 which was made by the competent authorities and also at belated stage the same was withdrawn.
- iii. That ground (c) of the appeal is incorrect and misconceived.
- iv. That ground (d) of the appeal is incorrect and misconceived. The private respondent was adjusted in the office respondent#3 upon the orders of competent authority. Private respondent is also performing his duties against post of C.T in the office of respondent#3 and withdraw salaries from his parent post.
- v. That ground (e) of the appeal of the appellant is related to the post of Physical Education Teacher. Burden of proof is over the shoulders of appellant.

vi. That ground (f) of the appeal of the appellant is incorrect. Hence, no admitted.

vii. That ground (f) of the appeal of the appellant is incorrect. Hence, no admitted.

viii. That ground (h) of the appeal of the appellant dependent upon the pure discretion of this honorable tribunal, hence no reply.

In wake of the submission made above, this Honourable Tribunal is humbly requested that on acceptance of the reply of respondent # 4, service appeal of the appellant may please be dismissed with costs.

Respondent No, 04.


DISTRICT EDUCATION OFFICER
SOUTH WAZIRISTAN T.D

"B"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.**

TB

No.

Appeal No.....11146..... of 2020

.....Muhammad Sharif..... Appellant/Petitioner

Versus

.....Through Secy, Edus. Dept. Pesh,..... Respondent

Respondent No.....5.....

Notice to:

Kifayatullah, CT Teacher, Presently
Posted at GHS, Wazirakai Tehsil Ladha
Distt. South Waziristan

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on.....24-3-2021.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

~~Copy of appeal is attached.~~ Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this...2nd.....

Day of.....March.....2021

at Camp Court D.I. Khan

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

“B”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

TB

Appeal No. 11146 of 20 20

Muhammad Sharif Appellant/Petitioner

Versus

Through Secy. Edu. 14 Pk Pesh. Respondent

Respondent No.

Notice to:

Genl. of 14 Pk Through Secy. Edu. Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on 24-3-2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this 2nd Day of March 2021.

at Camp Court D-1, Khas

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

3/3/21

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

TB

No.

Appeal No. 11146 of 20 20

Muhammad Sharif Appellant/Petitioner

Versus

Through Secy. Edu. I.P.C. Pesh. Respondent

Respondent No. 2

Notice to:

Director, E & S Education Govt. of
I.P.C. Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on 24-3-2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

~~Copy of appeal is attached.~~ Copy of appeal has already been sent to you vide this office Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this 2nd

Day of March 2021

at Camp Court D. P. Helwan

[Signature]
8/3/21

[Signature]
 Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

TB

Appeal No. 11146 of 20 20

du

Muhammad Sharif Appellant/Petitioner

Versus

Through Secy. Edu. Dept. Govt. of P.K. Respondent

Respondent No. 3

Notice to:

Additional Director Establishment
Education Management Deptt. Govt. of P.K.
Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on 24-3-2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

~~Copy of appeal is attached~~ Copy of appeal has already been sent to you vide this office Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this 2nd

Day of March 20 21

at Camp Court D.I. Peshawar

[Signature]

Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

TB

APPEAL No.....1146..... of 2020

Muhammad Sharif Khan

Appellant/Petitioner

Versus

Through Secy. Edu. Dept. Pesh:

RESPONDENT(S)

Res: No. 3.

Notice to Appellant/Petitioner

Additional Director
Establishment Education
Management Deptt. Pesh
Peshawar.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 21-6-2021 at 9:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at Camp Court D.I. Khan

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

113

No.

APPEAL No. 11146 of 20 20

Muhammad Sharif

Appellant/Petitioner

Versus

Through Secy. Edn: KPDC Pesh:

RESPONDENT(S)

Res: No. 5

Notice to Appellant/Petitioner

Kifayatullah CT Teacher
Presently Posted at GHS,
Wazirka Tehsil Ladhka Dist:
South Waziristan

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 21-6-2021 at 9:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at Camp Court D.I. Khan

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

Appeal No. 11166 of 20

M. Sharif Khan Appellant/Petitioner

Versus

Through Secy: Edu Dept Respondent

Respondent No. 1

Notice to:

Court of KPK Through Secretary
Education officer Pesh

15/11

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been issued to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 23/11/2024 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent~~ you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....

Day of..... 11.20.24

at camp court

D/Gen

9

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

TBDIK

Appeal No. 11146 of 20 20

M. Shrif Khan Appellant/Petitioner

Versus

Seny Education Respondent

Respondent No. 5

Notice to: Kifayat Ullah ET Presently Posted
 at GHS Wazir Warziki Teh Ladha S. Waziristan

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 25/12/20 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this 8

Day of 12 20 21

at camp court

D/Khu

[Signature]

[Signature]

Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

Note: - 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No..

T B DICE

Appeal No. 11146 of 20 20

M. Sharif Idris Appellant/Petitioner

Versus

Serj. (CESSE) Respondent

Respondent No. 1

[Handwritten signature]
14/12

Notice to: Govt of KPK Through Secretary
Education Pesh

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 25-1-22 at 8.00 A.M. If you wish to urge anything against the appellants/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of ~~appeal~~ is attached. Copy of appeal has already been sent to you vide this office Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this 8

Day of 12 20 21

at camp court

D I Dr

[Handwritten mark]

[Handwritten signature]

Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.