

21st Oct., 2022

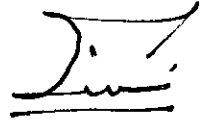
Nemo present on behalf of the appellant. Lawyers are on strike.

Appellant has not deposited security and process fee since 30.11.2021 despite repeated directions. Last opportunity is granted. Fresh notices be issued to appellant and his counsel to attend the office and deposit the security and process fee within 10 days of the receipt of this notice. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 27.12.2022 before S.B.


(Fareeha Paul)
Member(E)

19.04.2022

Nemo for the appellant. Security and process fee have not been deposited by the appellant, therefore, notice be issued to appellant as well as his counsel through registered post and to come up for further proceedings on 17.06.2022 before the S.B at Camp Court Abbottabad.



(Salah-Ud-Din)
Member (J)
Camp Court Abbottabad

16.06.2022

None present on behalf of appellant.

Security and process fee was not deposited. Despite directions notice was not issued to appellant/counsel. Therefore, fresh notice be issued to appellant/counsel to deposit security and process fee within 10 working days of the receipt of notice. Whereafter, notice be issued to respondents for submission of reply/comments. To come up for reply/comments on 19.08.2022 before S.B at Camp Court, Abbottabad.



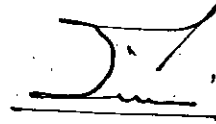
(Fareeha Paul)
Member (E)

سکسپورٹی جھوٹا
پروسی

30.11.2021

Learned counsel for the appellant present. Preliminary arguments heard.

Points raised need consideration, hence the appeal is admitted to regular hearing subject to all legal objections including the question of limitation. The appellant is directed to deposit security and process fee within 10 days, where-after notices be issued to the respondents for submission of written reply/comments on 18.01.2022 before the S.B at Camp Court Abbottabad.

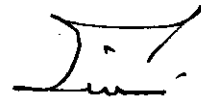


(Salah-Ud-Din)
Member (J)
Camp Court Abbottabad

18.01.2022

Clerk of learned counsel for the appellant present and requested for further time to deposit security and process fee.

The appellant is directed to deposit requisite security and process fee within a week, there-after notices be issued to the respondents for submission of written reply/comments before the S.B on 19.04.2022 at Camp Court Abbottabad.



(Salah-ud-Din)
Member (J)
Camp Court A/Abad

17.03.2021

Nemo for appellant.

Preceding date was adjourned on a Reader's note, therefore, appellant/counsel be put on notice for 14 / 7 /2021 for preliminary hearing, before S.B at Camp Court, Abbottabad.



(Rozina Rehman)
Member (J)
Camp Court, A/Abad

14.07.2021

Due to COVID-19, tour to Abbottabad has been cancelled, therefore, case to come for the same as before on 15.10.2021.



Reader

15.10.2021

Nemo for the appellant.

Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel and to come up for preliminary hearing before the S.B on 30.11.2021 at Camp Court Abbottabad.

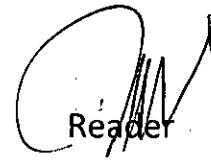


(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT ABBOTTABAD

Due to covid ,19 case to come up for the same on / /
at camp court abbottabad.

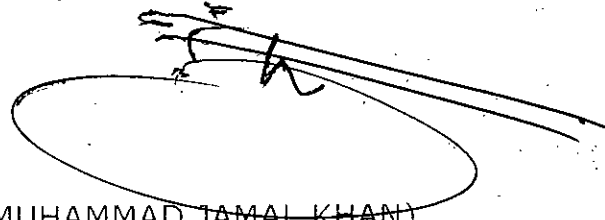
Reader

Due to summer vacation case to come up for the same on
18 / 9 / 20 at camp court abbottabad.


Reader

18.09.2020

Appellant Islam Shah has not forth come despite repeated calls at different intervals since morning, the last call was made at 12:26 P.M but no one appeared on his behalf. A cursory look at the preceding order sheet reveals that the appeal was adjourned twice due to spread of COVID-19, therefore, it is deemed appropriate to issue appellant and his respective counsel notice for appearance for 14.12.2020. File to come up for preliminary hearing before S.B at Camp Court, Abbottabad.


(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT ABBOTTABAD

Due to covid-19 case is
adjourned to 17-03-2021


Reader

24.10.2019

Appellant present in person. Counsel for the appellant is not present. Appellant requested for adjournment. Adjourn. To come up for preliminary hearing on 22.11.2019 before S.B at camp court, Abbottabad.



Member
Camp court, A/Abad

22.11.2019

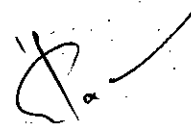
Clerk to counsel for the appellant present and submitted application for adjournment, placed on file of connected service appeal No.67/2019, with the request that next date may be fixed after 15.01.2020. Adjourn. To come up for preliminary hearing on 20.01.2020 before S.B at Camp Court, A/Abad. Last opportunity is granted.



Member
Camp Court, A/Abad

20.01.2020


Clerk to counsel for the appellant present and seeks adjournment as learned counsel for the appellant is not available. Adjourn. To come up for preliminary arguments on 21.02.2020 before S.B at Camp Court Abbottabad.



Member
Camp Court, Abbottabad

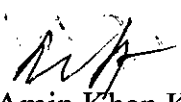
24.05.2019

None present on behalf of the appellant. Notice be issued to appellant and his counsel for preliminary hearing for 09.07.2019 S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad


09.07.2019

Counsel for the appellant present and requested for adjournment. Adjourned to 16.09.2019 for preliminary hearing before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

16.09.2019

Clerk of counsel for the appellant present and requested for adjournment on the ground that learned counsel for the appellant is not available today. Adjourned to 24.10.2019 for preliminary hearing before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

24.10.2019




Appellant present in person. Counsel for the appellant is not present. Appellant requested for adjournment. Adjourn. To come up for preliminary hearing on 22.11.2019 before S.B at camp court, Abbottabad.


Member
Camp court, A/Abad

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 69/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/1/2019	<p>The appeal of Mr. Islam Shah presented today by Malik Masood-ur-Rehman 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 15.1.19</p>
2-	25-1-19	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>22-3-19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	22.03.2019	<p>Appellant absent. Learned counsel for the appellant absent. Adjourn. To come up for preliminary hearing on 24.05.2019 before S.B at Camp Court A/Abad.</p> <p style="text-align: right;"> Member Camp Court A/Abad</p>

**BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. 69 /2019

Islam Shah son of Mian Gul Shah, PST Govt. Primary School Garaug
District Battagram.

....APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary
Education, Khyber Pakhtunkhwa, Peshawar & others.

....RESPONDENTS

SERVICE APPEAL

APPLICATION FOR CONDONATION OF DELAY

Respectfully Sheweth;-

The petitioner humbly submit as under;-

1. That the service appeal is going to be filed before this Honourable Tribunal today.
2. That after the rejection of departmental appeal of appellant on 25/10/2018 the appeal in hand is with time if found otherwise not within time the appellant seeks condonation of delay;-
 - (a). That the delay is not deliberate.
 - (b). That the act of respondents towards appellant was not positive.
 - (c). That the order originally passed for termination of appellant is void order and

under the law no limitation run against such order.

- (d). That the valuable rights of petitioner is involve in the matter in hand, keeping in view of the length of service of petitioner/ appellatant more then 25 years.
- (e). That the manner in which the order was passed is against the settled principle of natural justice.
- (f). That the miscalculation and non awareness, of law keeping in view the poor condition of appellatant is also the valid factor.
- (g). Some other points will be urged at the time of arguments.

Keeping in view the above cited submission, it, therefore, humbly prayed that by acceptance of this petition the delay may kindly be condone.

Dated: _____/2019

Through  ...APPELLANT

(MALIK MASOOD UR REHMAN AWAN)
Advocate Supreme Court of Pakistan

AFFIDAVIT:-

I, Islam Shah son of Mian Gul Shah, PST Govt. Primary School Garaug District Battagram, do hereby solemnly affirm and declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable court.




DEPONENT

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. 69 /2019

Islam Shah son of Mian Gul Shah, PST Govt. Primary School Garaug
District Battagram.

....APPELLANT

VERSUS

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Education, Khyber Pakhtunkhwa, Peshawar & others.

....RESPONDENTS

SERVICE APPEAL

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3.	Copy of order dated 28/07/1997	13 to 24	"B"
4.	Copy of order is appended herewith	25 to 27	"C"
5.	Copy of sack employees Act	28 to 33	"D"
6.	Copies of educational testimonials and service book	34 to 36	"E"
7.	Copy of writ petition alongwith order	37 to 47	"F"
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....APPELLANT

Through 

Dated: _____/2019

(Malik Masood-ur-Rehman Awan)
Advocate Supreme Court of Pakistan

**BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. 69 /2019

Islam Shah son of Mian Gul Shah, PST Govt. Primary School Garaug
District Battagram.

....APPELLANT

Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Diary No. 66

Dated 15/01/2019

1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
3. District Education Officer, Battagram.
4. District Accounts Officer Battagram.

....RESPONDENTS

Filed to-day

Registrar

15/1/19

SERVICE APPEAL UNDER SECTION 4 OF KPK
SERVICE TRIBUNAL ACT, 1974, FOR
DECLARATION TO THE EFFECT THAT ORDER
NO.1305-10/EB/PRY/SACKED EMPLOYEES DATED
31/01/2018 PASSED BY THE RESPONDENT NO. 3
WHEREBY THE SERVICES OF THE APPELLANT

WAS TERMINATED, IS ILLEGAL, UNLAWFUL, AGAINST THE LAW, ARBITRARY, PERVERSE, FANCIFUL, RESULT OF MALAFIDE, ILLEGAL EXERCISE OF POWERS AND INEFFECTIVE UPON THE RIGHTS OF THE APPELLANT.

=====

PRAYER: ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, BY SETTING ASIDE THE IMPUGNED ORDER NO.1305-10/EB/PRY/SACKED EMPLOYEES DATED 31/01/2018, THE RESPONDENTS BE DIRECTED TO REINSTATE THE APPELLANT IN SERVICE WITH ALL BACK BENEFITS. ANY OTHER RELIEF DEEMED FIT AND PROPER IN THE CIRCUMSTANCES OF THE CASE.

=====

Respectfully Sheweth: -

1. That the appellant was appointed in respondents department as PTC Teacher vide office order No. 326-348 dated 28/11/1995. Copy of order is annexed as Annexure "A".
2. That after rendering 5/6 years of service, the appellant was terminated during the year 1997.

Copy of order dated 28/07/1997 is annexed as Annexure "B".

3. That after the change of political scenario, the Govt. introduced **Sack Employees Reinstatement Act, 2010, amended 2013** and in view of the aforesaid Act, the services of appellant was reinstated vide office order No. 7825-31 dated 15/02/2013. Copy of order is appended herewith as Annexure "C".

4. That at the time of reinstatement, condition as per reinstatement office order at Para-7, which was contrary to the afore-referred Sack Employees Act, 2013. Regarding improvement of educational qualification was imposed. Copy of sack employees Act is appended herewith as Annexure "D".

5. That even then, the appellant improved his educational qualification prior in time, which were duly incorporated in the service book of appellant. Copies of educational testimonials and ~~Service~~ ~~book~~ are attached as Annexure "E".

6. That during the month of September of 2016, when the monthly salary of the appellant was stopped without any notice, then appellant firstly approached to the concerned departmental head, EDO Battagram, and thereafter having failed, approached to the Honourable Peshawar High Court, Abbottabad Bench through a writ petition No. 1040-A/2016, where the Honourable High Court not only issued the restraining order against the department but also later on, allowed the writ petition by issuing direction to the worthy Secretary Education. Copy of writ petition alongwith order is appended herewith as Annexure "F".

7. That where-after the worthy Secretary Education while holding a meeting in light of the judgment of Honourable Peshawar High Court, Abbottabad Bench, issued direction to the respondent No.3 for making a uniform policy for redressing the grievance of appellant and others vide order dated 14/02/2017. Copy of order is attached as Annexure "G"

8. That where-after when the matter was pending with respondent No. 3 and after the expiry of time set up by the Honourable Peshawar High Court, the appellant filed COC Petition No. 25-A/2017 where the Honourable Peshawar High Court issued the direction for implementation of the order passed in writ petition No. 859-A/2016 dated 14/02/2017, strictly with the judgment / order passed in afore referred writ petition. Copy of judgment/order passed in COC petition referred above is appended herewith as Annexure "H".
9. That the appellant performed his duty upto the month of January, 2018, where his attendance at the station is duly marked and checked by the officer concerned. Copy of attendance register is appended herewith as Annexure "I".
10. That now when the EDO concerned/respondent No. 3 inspite the undertaking before the court that he will implement the direction/judgment and order of Honourable Peshawar High Court, Abbottabad Bench, but since no order was passed/communicated to the appellant. The appellant again filed a COC petition vide No. 19-

A/2018 before Honourable Peshawar high Court where he came to know that an order dated 31/01/2018 thereby terminating the services of appellant has been passed behind the back of appellant which was later on 03/03/2018 was communicated to the appellant through post. Copy of the order is appended herewith with postal receipt are annexed as Annexure "J" & "K".

11. That feeling aggrieved, the appellant preferred an appeal to the respondent No. 1 on 16/03/2018 which was rejected on 26/09/2018 and the said order was communicated to the appellant on 25/10/2018. Copy of department appeal and order are annexed as Annexure "L" & "M".
12. That by now feeling still aggrieved after the rejection of departmental appeal vide order dated 26/09/2018 against termination order dated 31/01/2018 the instant service appeal is being filed, assailing the same being unwarranted at law and facts inter-alia on the following:-

GROUNDS; -

- a. That the order regarding the termination of appellant is totally against the Reinstatement of Sack Employees Act, 2013, which reveals that no condition can be imposed upon the any Employees while reinstating his services.
- b. That the appellant challenged the above condition set in Para-7 of his reinstatement order before the Honourable Peshawar High Court, Abbottabad Bench vide W.P No. 859-A/2016 dated 14/02/2017, where the Honourable Peshawar High Court, allowed the writ petition and issued direction for making a uniform policy for reinstatement of Sack Employees Act by comparing the reinstatement order of other districts, where no such condition was impose.
- c. That even in order to fulfill the above condition, the appellant improved his education prior in time and whereafter he submitted his educational certificates /

Sanad Degree to the concerned office which has taken its effect in service book of appellant.

- d. That the order under appeal is also against the judgment / order / direction passed in COC petition as well as the direction issued by the respondent No. 1 to the respondent No. 3.
- e. That the order under appeal regarding the termination of services of appellant is tainted with malafide and has been passed in back date just in order to infringe the right of appeal or any other right remedy to the appellant.
- f. That the impugned order is illegal, unlawful, without jurisdiction, arbitrary and perverse. Hence, liable to be set aside.
- g. That when the Honourable High Court has issued direction, the respondent No. 3 was duty bound to implement the same. Besides, the respondent No. 1 has also issued

directions to the respondent No.3 but both the directions were dealt so casually, calling immediate reversal by respondent No.1.

- h. That after the communication of order to the appellant/knowledge, the instant appeal is being filed.

It is, therefore, humbly prayed that on acceptance of the instant appeal, the impugned order may graciously be set-aside and appellant be ordered to be reinstated in service with all back benefits. Any other relief deemed fit and proper in the circumstances of the case

Dated: _____/2019

Through

(Malik Masood-ur-Rehman Awan)
Advocate Supreme Court of Pakistan

...APPELLANT

VERIFICATION:

Verified on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

...APPELLANT

**BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. _____/2019

Islam Shah son of Mian Gul Shah, PST Govt. Primary School Garaug
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....APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary
Education, Khyber Pakhtunkhwa, Peshawar & others.

....RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Islam Shah son of Mian Gul Shah, PST Govt. Primary School Garaug
District Battagram, do hereby solemnly affirm and declare that the contents
of foregoing appeal are true and correct to the best of my knowledge and
belief and nothing has been concealed therein from this Honourable Court.


DEPONENT



14

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) DELHLY, BATHINDA

Office Order

OFFICE ORDER NO.

DATE 27/7/1997

In the light of findings of the enquiry committee and in compliance with Memo No. P.No. 33/DEE/MSA/IV/Abdur Rashid/DAO (M) Primary Bathinda/AD(H&A)-M No. 33499 Dated 25.7.97.

The appointment of the following persons have been found illegal ab initio void and against the prescribed rules. Their services are, therefore, dispensed with, with effect from the date of their replacement by those selected on purely merit basis in the light of following the selection procedure as admissible under the rules.

However, they can apply afresh along with others for their selection on merit.

S.No.	Name of Person	Maths / Hindi	Medium	Name of School
1.	Indrullah	Arif Hussain Khan	P.T	OPD Sherikabad.
2.	Shamsul Wahab	Abdul Wahab	"	Jijbori.
3.	Alim Zaib	Zur Gul Khan	"	Dhawal Abad.
4.	Razal Wahab	Abdul Wahab	"	Sun Haddi.
5.	Amir Aliaro	Rustam Khan	"	Shawal B.roy.
6.	Amir Zada	Abdul Qadous	"	Paway Puchto.
7.	Haz Muhammad	Hazarat Hussain	"	Hasrubad.
8.	Muhammad Multan	Uzair	"	Harwali
9.	Adrat Ali Shah	Ruwab Shah	"	Oldri.
10.	Muhammad Eherin	Hijab Khan	"	Tikar Banda
11.	Tanzeem Khan	Multan Khan	"	Mithal.
12.	Muhammad Shafiq	Muhammad Khan	"	Gar Haroon.
13.	Ibrahim	Gul Faraz	"	Ajawa.
14.	Alim Zaib	Mohal Khan	"	Gijbori.
15.	Mouhameen	Noorul Khan	"	Katharabad.
16.	Yakub Rahman	Bukhter	"	Gangyal.
17.	Anwar Rehman	Muhammad	"	Gangoo.
18.	Anwar Faraz	Bumadar Khan	"	Dodpatti.
19.	Anwar Zamin	Abdul Bhattor	"	Gurati Abroy.
20.	Gul Fari	Shah Jehan	"	Chinow.
21.	Ibduar Rehman	Miqah Shah	"	Rashidabad.
22.	Abdul Basir	Satifulloh	"	Soori.
23.	Anwar Zaib	Yousaf Farhad Khan	"	Shagay.
24.	Anwarullah	Muhammad Ullah	"	Kurag.
25.	Abdul Chaffor	Mardous Khan	"	Bumari.
26.	Muhammad Usaf	Kehat	"	Koyar.
27.	Abdullah	Jatifaqah	"	Shakhay.
28.	Muhammad Ibrahim	Muhammad Ja.	"	Garh N. Said.
29.	Gul Abbas	Zahidul Khan	"	Nar Sakargab.
30.	Saibir Muhammad	M. Kustab	"	Lalmai.
31.	Hadim Azam	Aurangzab.	"	Goli Battagra
32.	Farid ur Rehman	Zaib ur Rehman	"	N/ Pathool.
33.	Raza Muhammad	Awal S. M.	"	Achowaley.
34.	Amir Muhammad	Muhammad Qadri	"	Okoy.
35.	Muhammad Haq	Muhammad Khan	"	Pelahi.
36.	AMIR Ladd	M. Rehman Khan	"	Chopkhar.
37.	M. Dhanubi	Muhammad Khan	"	do.
38.	Ittehar	Amir A. Rehman	"	Gauvali.
39.	Riaz Muhammad	Amir Khan	"	CCJ Jachai.
40.	Khullil ur Rehman	Amir Khan	"	Dijdar.
41.	Fida Muhammad	Amir Khan	"	Dhoshan. Jor.
42.	Amir Muhammad	Amir Khan	"	Har.
43.	Amir Muhammad	Amir Khan	"	Har.
44.	Amir Muhammad	Amir Khan	"	Har.
45.	Amir Muhammad	Amir Khan	"	Har.
46.	Amir Muhammad	Amir Khan	"	Har.
47.	Amir Muhammad	Amir Khan	"	Har.

Asst Dist Officer (P.T.)
(322) Bathinda

15

51.	Daraj Khan	Halsat Khan	IT	HSQ:	Doraj H. Jan.
52.	Said Ali Shah?	Said Main	"	"	Bar Kau De-rang.
53.	Haik Muhammad?	Jalal Khan	"	"	Gulrehan.
54.	Motur Rehman?	Azar Dakt	"	"	H. K.G.S. Hassan.
55.	Inyat ur Rehman?	Ali ur Rehman	"	GPS	D. Azimullah.
56.	Mir Saad Khan?	Hakim Khan	"	"	Rashid Akad.
57.	Mumin Khan?	Huzrat Dakt	"	"	Mashkon?
58.	Chulam Arooq?	Ajma Khan	"	"	H. Potey.
59.	M. Habibullah Shah.	Tahir Shah	"	HSQ	M. Jan Muhammad
60.	Liaquat Ali?	Ibrahim	"	"	Bara Dhorng.
61.	Xiraj Shah?	Mian Khan	"	"	Bhaxi J. J. Kan.
62.	Yazl ur Rehman?	Abdul Hamid	"	"	Hajragran
63.	X. Javid H. Iqbal	Aurangzaid	"	"	Talshous.
64.	Hazir Muhammad	Furhad	"	"	Hanifabad.
65.	Jihonul Haq	Abdul Aman	"	HSQ	Kasul Hall.
66.	M. Huz	Quluss Hussain	"	GPS	Kathora.
67.	Aurangzaid Khan	Mandra Khan	"	"	Barrai.
68.	S. Zuhrob Shah	Fargan Said	"	"	Damgar.
69.	Munir Khan?	Gul. Haroz	"	"	Jabatiruz
70.	Rustam Khan?	Higra Khan	"	"	Mashkanal.
71.	M. Shafigue?	Aqilluh	"	"	Kiargali U. Khan.
72.	Nadar Khan?	Ali Gouar Khan	"	"	Cidri Trand.
73.	Fida Muhammad?	Fazl ur Rehman	"	"	X D. Azimullah.
74.	M. Khalid?	Gulten Roza	"	"	Damgat.
75.	Ibrahulah?	Hidayatullah	"	"	Mashidabad.
76.	M. Dalil?	Ykhtiar Malook	"	"	Gidri Trand.
77.	Ahmed Khan?	Gul M. Khan	"	"	Jaba Teroz.
78.	Amal Jan?	Saitul Haq	"	"	Mundri.
79.	Yatohul ah?	M. Farideen	"	"	Dudpatti.
80.	Zabal Khan?	Abas Khan	"	"	Paria Hill.
81.	Chulam Rehmani?	Fazl ur Rehman	"	"	Chingov.
82.	Nadiaz Zaman?	Tali Muhammad	"	"	Talshous.
83.	S. Wahab Shah	M. Said	"	"	Bagh Bahda.
84.	Abdul Ali?	Abdul Malik	"	"	Ohinow.
85.	Miskin?	Abdul Latif	"	"	Dujergam.
86.	M. Javid?	Zamanullah	"	"	Pakbanda.
87.	Mahmood Shah?	Said Rahar Shah	"	"	Honifabad.
88.	Mahzuda?	Abdul Mateen	"	"	Barney.
89.	Shaukat Ayaz?	Mulak Jan	"	"	Mundri.
90.	Inamullah?	Bara Khan	"	"	Dujergam.
91.	M. Habibullah?	Jawar Khan	"	"	Paria Hill.
92.	Aurangzaid?	M. Miskeen	"	"	G/Nawab Said.
93.	Dakht Morin?	Munhak	"	"	Murzala.
94.	Ali Aour Khan?	Miqar Khan	"	"	Trand.
95.	M. Iqbal	Gul Muhammad	"	"	Chaypergam.
96.	M. Mustwa Khan	Talas Khan	"	"	Penhora.
97.	M. Shubid	Abdul Razag	"	"	Shalkbay.
98.	M. Attullah	M. Saed	"	"	do
99.	Sirah Rozam?	Hayat Khan	"	"	Walargat.
100.	Ali Rahman	Uara Khan	"	"	Okey.
101.	Muhammad Ahmed?	Bharin Khan	"	"	Parbor.
102.	Rob. Nawaz Khan?	Afraz M. Khan	"	"	rashidabad.
103.	Farhat Khan?	Murad	"	"	Shaukat abad
104.	Inyat ur Rehman?	Gujar Khan	"	"	S. Khal. bunda
105.	Hidayatullah?	Shah Zad Khan	"	"	Dabona.
106.	Muzul Lulam?	Suzrot Halla	"	"	khato onal.
107.	Mustam?	Babir Khan	"	"	Sal Banta.
108.	Fazrat Ialam?	M. Zahir	"	"	rezur Khayconna
109.	Tali Muhammad?	Roshan Khan	"	"	Thoya.
110.	M. Javid	Mer Ahmad	"	"	J. Biokote.
111.	Shaukat dir	Muhyudin	"	"	Alam. Kambor
112.	Nadar Khan	Mir Ahmed Khan	"	"	Rutur. Abad.
113.	M. Attullah?	Avenullah	"	"	Kulilar.
114.	Talca Shah?	Mion Gul Shah	"	"	Chunhaiden.
115.	M. Helim Shah?	Mutabar Shah	"	"	Dujergam.
116.	Mahiddad?	Gul Haz	"	"	M. N. Saed.
117.	Saeed ur Rehman?	Kuchkol Khan	"	"	Coon. Saidor.
118.	Sardor Muhammad?	Haleat Yamin	"	"	khait. Kallishah
119.	M. Amir Faraz	Abdul Wahab	"	"	D/Cher. Said.
120.	Shaukat Ali Shah?	Muhammad Habibullah	"	"	and ar. Said. Tikay

Cont. P/3

Dist Officer (Dist) (S.A.) Dargam

Dist Officer (Dist) (S.A.) Dargam

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P.M. 60...3...

140. Faiz ul Bari	M. Hussain	P. 1	Hassid Abad.
141. Talah Muhammad	Fida Muhammad	"	G. B. Bhoj.
142. M. Zahid	Mahmud Gul	"	N. Wali G. C.
143. Iftakhar Shaid	M. Roshan	"	Khalid W. L. S. S.
144. Abdul Ghani Shah	Munzwar Shah	"	Oban Saidan.
145. M. Fuzah Shah	Poyee Khan	"	G. B. O. H. S. Said.
146. Wabeed Khan	M. Zahir Shah	"	I. H. Akad.
147. Hojaul Haq?	Said Ali Khan	"	Adhruvali Takyu.
148. Saio Alau?	Abdul Qoyyus	"	Daboch.
149. Hizbulah	Jan Alau	"	Kalshul.
150. Attaulah	Astus Khan	"	Saproona.
151. Mentoosullou	Afsh	"	do.
152. Ejaz Shaid	Vuli Walullah	"	Kloushal.
153. Sherin Zada	M. Zahir Shah	"	Harwarin.
154. Wazir Muhammad	Ghulam Haider	"	Bar Murin.
155. Khurshid Khan	Fazal Haji	"	Mudhah.
156. Miaz Muhammad?	M. Imshad	"	do.
157. M. Iqbal	Muhammad Aza Khan	"	Mikundi.
158. M. Habiulish	Aurangzab	"	Muzala.
159. M. H. Ullah?	M. Ali Shah	"	do.
160. Yemal	Hada Khalil	"	Ajlo. Ranginabad.
161. Golzarul Wahab?	M. Hussain	"	Gulfi Kad.
162. Jihon Zaid?	Abdul Wahab	"	Shaukat Abad.
163. M. Asghar?	Shah Zada	"	Kuchal.
164. M. Mumtaz?	Azimullah	"	Madrwali.
165. M. Shurain	Said Ali	"	Haijo.
166. M. Khurshid	Rehmat Ullah	"	Oban Saidan.
167. M. Yousif?	M. Ayub	"	Hil.
168. M. Tariq	Ghulua Habi	"	Baboon.
169. Khan Mulla mad.	Pir Muhammad Khan	"	Rajargan.
170. Abaziz	Teemasz Khan	"	Beri Ghali Bada.
171. Baz Muhammad?	Abdul Haq	"	Tadul Hozan Abad.
172. Abdul Haq	Asanullah	"	Oban Saidan Muz.
173. M. Shabir Muhammad	Sha. ur Khan	"	M. Tharay Karin.
174. Amir Muhammad	Habib Said	"	Khalid Aladdin.
175. Feroiz Khan?	Jan Muhammad	"	Tandi.
176. Inayat ur? anan M. Muddaz	Saif ulloh Khan	"	Baz Wal.
177. M. Daryat?	M. Hussain	"	Gandor.
178. Abdul Haq?	M. Noor	"	Bada Battangi.
179. Ghulam Youcef	Azia Khan	"	Kandloo.
180. Adan Khan	M. Khur Wali	"	Magiro
181. M. Rehman	M. Israil	"	Keen Darra.
182. Gul Khan	Abdullah Jan	"	Kar.
183. Zulfiqar Ali	Lucha Khan	"	Mano Pashto.
184. Gul Har?	Hadyat ul. ah	"	Muskani.
185. Zia ur Rehman?	Gul Akher	"	Saul Seri.
186. Jamil ur Rehman	Fazl ur Rehman	"	Ashurban.
187. Fida Muhammad?	Shar Muhammad	"	Barnar Ali.
188. M. Zante Ali	Bultra Muhammad	"	Karboxi.
189. M. Zahir Shah	Tora Baza	"	Ginjbbif.
190. S. Shaid Shah?	Obargen Gul	"	Bateela.
191. M. Fayaz?	M. Hobi Shah	"	Bala.
192. Bidor Bokht?	Aurangzab	"	Doonga.
193. Attallah	Loyab Khan	"	Magiro.
194. Tajud din	Falut Khan	"	Alasi Kandow.
195. Ghulam Haider	Abdul Karim	"	Jubba Bahatur.
196. M. Hoor Saad	Shah Mir Ali Shah	"	Batley.
197. M. Hamidullah	Ahmed Khan	"	Kuhurband.
198. M. Kaveer	Saidullah	"	Kurin.
199. Hamidu. ah	Gul Fazil	"	Bala Batecha
200. Amir Muhammad	Noji Fazil Wahid	"	Kachori.
201. M. Sharif	Shauhar Rehman	"	Maryia Sultan.
202. M. Shur Ali	Mir Dad	"	Hoter Dighan.
203. M. Said Ali Shah	Mauhar Khan	"	Peshora.
204. M. Arasad	Umer Said	"	Karia Forp.
205. M. Habiur Khan	Jumroz Khan	"	do.
206. Karayutallah?	Aurangzab Khan	"	Jumbag.
207. M. Lulla?	Abdul Rashid	"	Jamroz Gada.
208. M. Muzaz B. Khan	Mehrajun Habi	"	do.
	Taj B. Khan	"	Batarkool

Asst. Dir. Office (200) Bagram

Asst. Dir. Office (200) Bagram

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PAG. 83....3.....

119.	✓ Faiz ul Bari	M. Hussain	P. 4	H. M. Abad.
120.	✓ Talib Muhammad	Fida Muhammad	"	G. S. Hong.
121.	✓ M. Zaid	Mudabbir Gul	"	S. M. T. G. T.
122.	✓ Iftakhar Ahmad	M. Roshan	"	Kh. M. M. M. M. M.
123.	✓ Abdul Ghani Khan	Munawar Shah	"	Chan Spidan.
124.	✓ Ghani Khan	Poyce Khan	"	G. S. M. M. M. M. M.
125.	✓ M. Fuzul Khan	M. Zahir Khan	"	E. M. Abad.
126.	✓ Waheed Khan	Said Ali Khan	"	A. M. M. M. M. M.
127.	✓ Nojaul Haq?	Abdul Qayyum	"	Daboon.
128.	✓ Said Alam?	Jan Alam	"	Kaishul.
129.	✓ Khizbulah	Astam Khan	"	Saproona.
130.	✓ Attaulah	Attah	"	-do-
131.	✓ Mehtozullah	Wali Walulloh	"	Klushul.
132.	✓ Ejaz Ahmad	M. Zahir Khan	"	Baraurin.
133.	✓ Sherin Zada	Ghulam Haider	"	Har Harin.
134.	✓ Yousif Muhammad	Fazal Noji	"	Kuchan.
135.	✓ Khurshid Khan	M. Ibrahim	"	-do-
136.	✓ Mirza Muhammad?	Mubammad Awa Khan	"	M. Kundli.
137.	✓ M. Iqbal	Aurangzib	"	Burzala.
138.	✓ S. Habiullah	M. Ali Shah	"	-do-
139.	✓ Abu H. Ullah?	Heda Khalil	"	J. K. Ranginabad.
140.	✓ Y. M. M.	M. Hussain	"	M. M. Abad.
141.	✓ G. M. M. M. M.	Abdul Wahab	"	Shaukat Abad.
142.	✓ Jihon Zaid?	Shah Zada	"	Kuchal.
143.	✓ M. M. M. M.	Azizullah	"	Mandwali.
144.	✓ M. M. M. M.	Said Ali	"	M. M. M.
145.	✓ M. M. M. M.	Rehmatullah	"	Olmas Saidan.
146.	✓ M. M. M. M.	M. Ayub	"	M. M.
147.	✓ M. M. M. M.	Ghulam Nabi	"	Daboon.
148.	✓ M. M. M. M.	Pir Muhammad Khan	"	Rajargan.
149.	✓ Khan M. M. M.	Teemaz Khan	"	Beri Khali Bunde.
150.	✓ M. M. M. M.	Abdul Latif	"	Isadul Hosen Abad.
151.	✓ M. M. M. M.	Amanullah	"	Chan Saidan Maran
152.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
153.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
154.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
155.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
156.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
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158.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
159.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
160.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
161.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
162.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
163.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
164.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
165.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
166.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
167.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
168.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
169.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
170.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
171.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
172.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
173.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
174.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
175.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
176.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
177.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
178.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
179.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
180.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
181.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
182.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
183.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
184.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
185.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
186.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
187.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.
188.	✓ M. M. M. M.	M. M. M. M.	"	M. M. M. M.

Dist. Office (1841) Baramulla
Dist. Office (1841) Baramulla
Dist. Office (1841) Baramulla

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101. Davoid Isal	Dilawar Khan	PT	MS: Maryula Sultan.
102. M. Abdul Qadir ?	Abdul Hakim	"	Jicool.
103. Nozi Shafiqullah	K. Kuvata	"	Chunwuli.
104. Aziz ur Rehman ?	Abdur Rehman	"	Arzakhori.
105. Nazir Afzal ?	Sukandar Khan	"	Matta Haroor.
106. M. Qaim Khan ?	Shah Nawaz	"	Matta Haroor.

(M.A. DUBUWAS, TD)
 DISTRICT EDUCATION OFFICER (M.A.E)
 PRIMARY BATTAGRAM

Encl: No. 2914-18 Dated Battagram the 28/5 /1957

Copy of the above are submitted to:-

- 1). Director Primary Education, M.A. Dalgaria, Guddan, Peshawar.
- 2). P.O. to Secretary of Education, M.A. Dalgaria, Peshawar.
- 3). M.A. (M) Battagram with the remarks to all concerned the above mentioned teachers on their request and reasons. Moreover, to inform the P.O. or any other officer of the District if some one has already been transferred.
- 4). District Account Officer, Battagram.

(M) PRIMARY BATTAGRAM

Asst Dist Officer (Edt)
 (S.S.) Battaram

Asst Dist Officer (Edt)
 (S.S.) Battaram



OFFICE OF THE DISTRICT EDUCATION OFFICER (M) PRIMARY BATTAGRAM

OFFICE ORDER NO. ____
DATED: 28/07/1997

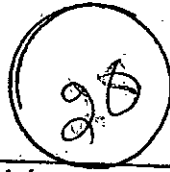
OFFICER ORDER

In the light of findings of the enquiry committee and in compliance with Memo No. P No. 33/ DEP/ E_XA Abdur Rashid (DEO (M) Primary Battagram /AD(E_XA) No. (M) No. ____ 33499 Dated 25/07/1997.

The appointment of the following persons above been found illegal abinitio void and against the prescribe roles. Their services are therefore, dispensed with, with effect from the date of their replacement by there as located on purely merit basis in the light of following the selection procedure on admissible under the rules.

However, they can apply afresh along with others for their selection on merit.

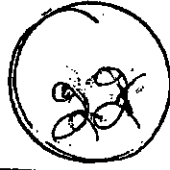
S/No.	Name of Person	Father Name		Name of School
1.	Indadullah	Musa Khan	P.T	GPS Sherri
2.	Wahab	Abdul Wahab	P.T	Jijbori
3.	Alam Zaib	Zar Gul Khan	P.T	Sharif Abad
4.	Fazal Wahab	Abdul Wahab	P.T	
5.		Rustam Khan	P.T	Shawal Boy
6.	Amir Zada	Abdul Qadoos	P.T	Powey
7.	Baz Muhammad	Hazrat _____	P.T	Nasirabad
8.	Muhammad Sultan	Ghazi	P.T	Banwali
9.	Qudrat Ali Elahi	Wahab Shah	P.T	Gidri
10.	Muhammad Sherin	Hijab Khan	P.T	Tikar Banda
11.	Tameez Khan	Sultan Khan	P.T	Hutbal
12.	Muhammad Shafique		P.T	Gat Baroon
13.		Gul Faraz	P.T	Ajmera
14.	Alam Zaib		P.T	Gijbori
15.		Noorul Haroon	P.T	
16.	Yasir Rehman	Mukhtar	P.T	Gangwal
17.	Shour Rehman		P.T	Bangoo
18.	Anwar Faraz		P.T	Docdpatti
19.	Anwar Zamin	Abdus Sattar	P.T	Gharati
20.	Gul Fad		P.T	
21.	Ibadur Rehman	Niqab Elahi	P.T	Rashidated
22.	Abdul Bashir		P.T	Sooraj
23.	Anwar Zaib		P.T	



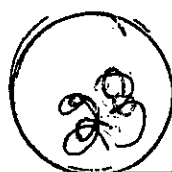
24.	Anwarullah	Muhammad Ullah	P.T	Kuree
25.	Abdul Ghafoor		P.T	
26.	Muhammd Umer	Rehmat	P.T	
27.	Abdullah		P.T	
28.	Muhammad Ibrahim	Muhammad	P.T	
29.	Gul Abbas		P.T	Goli Battagram
30.	Shabir Muhammad		P.T	B/ Balkool
31.	Nadim azam	Aurangzeb	P.T	
32.	Saeed Rehman ur	Aziz Rehman ur	P.T	
33.	Raza Muhammad	Abid Khan	P.T	
34.	Afsar Rasheed		P.T	
35.		Maqbool Khan	P.T	
36.	Anwar		P.T	
37.	M. Shoaib		P.T	
38.	Ifikhar		P.T	
39.	Riaz Muhammad		P.T	
40.	Khalil Rehman ur		P.T	
41.	Fida Muhammad		P.T	
42.			P.T	
43.	Ameer Muhammad	Inyat Khan	P.T	
44.		Sohrab Khan	P.T	
45.	Anwar Zaib	M. Ayaz	P.T	
46.	Haq Nawaz	Zahir Shah	P.T	
47.	Shad Muhammad	Fugal Khan	P.T	
48.	Amir Muhammad		P.T	
49.	Duraj Khan	Halamat Khan	TT	Boraj M. Jan
50.	Baid Ali Shah		P.T	Bor Kau Jazana
51.		Jalal Khan	P.T	Gulrehan
52.	Inyat Rehman ur	Ali ur Rehman		G.K.G.S Hassan
53.	Mir Samad Rehman	Hakim Khan	P.T	D Azimullah
54.	Momin Khan	Hazrat Balil	P.T	Rashid Abad
55.	Ghulam Farooq	Ajum Khan	P.T	Hashkani
56.	Habibullah Shah	Tahir Shah	P.T	B. Pattey
57.	Liaqat Ali	Ibrahim	NSQ	B. Pattey
58.	Siraj Khan	Mian Khan	P.T	H. Jan Muhammad
59.	Fazl ur Rehman	Abdul Hamid	P.T	Bera Dhoniga
60.	Javid M. Iqbal	Aurangaib	P.T	Dheri Jame



				Khan
61.	Nazir	Farhad	P.T	Bajragrab
62.	Jihanul Haq	Abdul Aman	P.T	Talshaud
63.	M. Riaz		P.T	Hanifabad
64.	Aurangzeb Khan	Mindra Khan	P.T	Kassi Hadi
65.	S. Zuhrah Shah	Fargan Said	P.T	Kathora
66.	Munir Khan	Gul Namroz	P.T	Burwai
67.	Rustam Khan	Biqra Khan	P.T	Dawgar
68.	M. Shafique	Abdullah	P.T	Jabatiruz
69.	Badar Khan	Ali Gohar Khan	P.T	Mashkanai
70.	Fida Muhammad	Fazl ur Rehman	P.T	Kiargali U. Khan
71.	M Khalid	Bultan Room	P.T	Gidri Trund
72.	Ibrarullah	Hidayatullah	P.T	N D. Azumullah
73.	M Balil	Ikhtiar Malook	P.T	Damgat
74.	Ahmed Khan	Gul M. Khan	P.T	Rashidabad
75.	Amal Jan	Baitul Haq	P.T	Gidri Trand
76.	Fatebul	M. Faridoon	P.T	Jaba Teroz
77.	Zabel Khan	Abad Khan	P.T	Mundri
78.	Ghulam Rehmani	Fazl ur Rehman	P.T	Docdpatti
79.	Badi uz Zaman	Tali Muhammad	P.T	Turia Hill
80.	S. Wahab Shah	M. Said	P.T	Ghinoon
81.	Abdul Ali	Abdul Latif	P.T	Talshous
82.	Miskin	Amanullah	P.T	Bagh Bandi
83.	M Javaid	Said Rehmat Shah	P.T	Chinwo
84.	Mehmood Shah		P.T	Bajergran
85.	Shahzada	Abdul Matein	P.T	Pekbanda
86.	Shoukat Ayaz	Mulak Jan	P.T	Hanifabad
87.	Inamullah	Pera Khan	P.T	Borwey
88.	Habibullah	Junsor Khan	P.T	Mundri
89.	Aurangzeb	M. Miskeen	P.T	Bajergran
90.	Bakht Morin	Hushnak	P.T	Teria Hill
91.	Ali Asar Khan	Misar Khan	P.T	G/Nawab Said
92.	M Iqbal	Gul Muhammad	P.T	Murzala
93.	Rustam Khan	Talas Khan	P.T	Obappergram.
94.	M Shabid	Abdul Razaq	P.T	Peshora
95.	Attaullah	M. Saeed	P.T	Shalkhay
96.	Shah Rozen	Hayat Khan	P.T	Do
97.	Ali Rehman	Umra Khan	P.T	Walarge
98.	Hussain Ahmed	Sherin Khan	P.T	Okey
99.	Rab Nawaz Khan	Afsar M. Khan	P.T	Tarbor
100.	Farhat Khan	Murad	P.T	Rashidabad
101.	Inyat ur Rehman	Gujar Khan	P.T	Shoukat Abeo
102.		Shah Zad Khan	P.T	S. Khal Bando
103.	Noor ul Islam	Hazrat	P.T	Dabons



104.	Rustam	Babir Khan	P.T	Khatoona
105.	Bazrat Islam	M. Zanif	P.T	Pak Banna
106.	Haji Muhammad	Roshen Khan	P.T	
107.	M Javaid	Mer Ahmed	P.T	Thaya
108.	Shamshed Din		P.T	Balakote
109.	Nadar Khan	Mir Ahmed Khan	P.T	
110.	Attullah	Amanullah	P.T	Rutiar abad
111.	Islam Shah	Zain Gul	P.T	Kukilar
112.		Mutabar	P.T	Ghanibaidan
113.		Gul Naz	P.T	Hajagram
114.	Saeed Rehman ur	Kuchkol Khan	P.T	M.M Ahmed
115.	Sardar Muhammad	Hasrat Younis	P.T	Khait Walianab
116.	Anwar Faraz	Abdul Wahab	P.T	B/ Cherinbaid
117.	Shokat Ali Shah		P.T	
118.	S. Mukhtair Ali		P.T	
119.	Faiz ul Bari		P.T	Hanifabad
120.	Talash Muhammad		P.T	
121.			P.T	
122.	Iftakhar Ahmed	M Roshen	P.T	
123.	Abdul Ghani Shah		P.T	Ghari Soldan
124.		Poyee Khan	P.T	GPS/ B/ Charri Said
125.	S. Farhad Shah	M. Zahir Shah	P.T	
126.	Habib Khan	Said Ali Khan	P.T	
127.	Rajwal Haq	Abdul Qayoom	P.T	Daboone
128.	Saib Alam	Jan Alam	P.T	Kaishal
129.	Hizbullah	Astan Khan	P.T	Saprocha
130.	Attaullah	Aftab	P.T	Do
131.	Mehtoozullah	Wali Waliullah	P.T	Kiashal
132.	Ejaz Ahmed	M.Zahir Shah	P.T	Barmarla
133.	Sherin Ahmed	Ghulam Haider	P.T	Bar Muria
134.	Bashir Muhammad	Fazal Haji	P.T	Yar
135.	Khurshid Khan	M. Irshad.	P.T	Do
136.	Niaz Muhammad	Muhammad Asa Khan	P.T	Birkuni
137.	M Iqbal	Aurangzeb	P.T	Ranzala
138.		M. Ali Shah	P.T	Do
139.		Mada Khail	P.T	
140.	Ismail	M. Hassan	P.T	
141.	Gulzar Wahab ul	Abdul Wahab	P.T	Shoukat Abad
142.	Jihan Zaib	Shah Zada	P.T	Kuchal
143.	M. Bashir	Azimullah	P.T	Mandrwali
144.	M. Mumtaz	Said Ali	P.T	Ranjo
145.	M. Sharin	Rehmatullah	P.T	Ohem Saidsh



146.	Khurshid	M. Ayub	P.T	Illahi
147.	Younis	Ghulam Nabi	P.T	Daboona
148.	M Tariq	Pir Muhammad Khan	P.T	Lagargran
149.	Khan Muhammad		P.T	Deri Bhali Banda
150.	Abaziz	Abdullah	P.T	Landoi Noman Abad
151.	Baz Muhammad	Amanullah	P.T	Chan
152.	Abdul Haq		P.T	
153.	S. Shabir Hussain	Habib Said	P.T	
154.	Amir Muhammad	Jan Muhammad	P.T	
155.	Pervaiz Khan	Saif ullah Khan	P.T	
156.	Inayat ur Rehman		P.T	
157.	M. Boyat	M. Noor	P.T	
158.	Abdul Haq	Aziz Khan	P.T	
159.	Ghulam Yousaf	M khan wali	P.T	
160.	Adam Khan	M. Irshad	P.T	Neen Dara
161.	M. Rehman	Abdullah Jan	P.T	Kar
162.	Gul Khan	Lucha Khan	P.T	Hano Pashto
163.	Zulfiqar Ali	Hedyat ullah	P.T	Muskani
164.	Gul Bar	Gul Akbar	P.T	Dubal Swr
165.	Zia ur Rehman	Fazl ur Rehman	P.T	Barwr Ptd
166.	Jamil ur Rehman	Shar Muhammad	P.T	Karbori
167.	Fida Mehmood	Sultan Muhammad	P.T	Ginjbri
168.		Tora Baz	P.T	Butteela
169.	Gul Zahir Shah	Obargoh Gul	P.T	
170.	S Ahmed Shah	Habib Shah	P.T	Doonga
171.	M. Fayaz	Aurangzeb	P.T	Faqiro
172.	Bidar Bakht	Poyab Khan	P.T	
173.	Attullah	Tolut Khan	P.T	Jabba Bahadar
174.		Abdul Karia	P.T	Batley
175.	Ghulam Haider Shah		P.T	
176.	Hoor Saeed	Ahmed Khan	P.T	Karin
177.	S. Hamidullah	Ubaidullah	P.T	Mala Battela
178.			P.T	
179.	Hamidullah	Haji Faiz Wahid	P.T	Naryais Sultan
180.	Amir Muhammad		P.T	Roter Dishan
181.	M. Sharif	Hir	P.T	Peshora
182.	Bhar Ali	Mubatar Khan	P.T	Karin Pora
183.	Said Ali Shah	Umer Said	P.T	Do
184.	M Arshad	Jumroaz Khan	P.T	Jambaig
185.	Khawar Khan	Aurangaib Khan	P.T	Jamroz Gada



186.		Abdul Rashid	P.T	Do
187.	M. Balawal		P.T	Batarkool
188.	Nawaz Khan	Taj Muhammad	P.T	Naryala Sultan
189.	Javaid Iqbal	Dilawar Khan	T.T	
190.	Abdur Rauf	Abdul Hakim	P.T	Jigool
191.			P.T	
192.	Atiq ur Rehman	Abdur Rehman	P.T	Hatta Manssor
193.	Nazir Ahmed	Sakandar Khan	P.T	
194.	M. Naim Khan	Shah Nawaz	P.T	

(MALIK ABDUR RASHID)
DISTRICT EDUCATION OFFICER, (MALE)
PRIMARY BATTAGRA

Endst No. 2414-18/ Dated Battagram the:-

dated: 28/____/1997

Copy of the above are submitted to:-

1. Director Primary Education N.W.F.P Dalgari Garden Peshawar.
2. F.B. To Secretary of Education N.W.F.P Peshawar.
3. SDEO (M) Battagram with remarks to direction all the above mentioned.
4. District account officer.

(MALIK ABDUR RASHID)
DISTRICT EDUCATION OFFICER, (MALE)
PRIMARY BATTAGRA

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BATTAGRAM.

ORDER

26

Consequent upon the recommendation of the Departmental Selection Committee and approval of the competent authority (Deputy Commissioner) Battagram, in the light of Khyber Pakhtunkhwa Act XVII 2012 and Honorable Court Judgment Peshawar High Court Abbottabad Bench dated 17-01-2013 the following Sacked employee are hereby appointed as PST in BPS-12 (Rs:7000-500-22000) (Non pensionable) plus usual allowances as admissible under the rules against the vacant post at the schools mentioned against each in the interest of public service with effect from the date of their taking over charge

S. No	Name of Candidates	Father's Name	Address	Posted at	Remarks
1	Sardar Mohd. Khan	Hazrat Younas	Thaya Banian BTM	GPS Batkool Sarhadi	Against V/Post
2	Ghulam Halder Shah	Pir Ali Shah	Kuz Madan BTM	GPS Kar Patay Pashto	Against V/Post
3	Bahadar Khan	Ali Gohar Khan	Dharian BTM	GPS Kanni	Against V/Post
4	Ghulam Yousaf	Mohi Khan Wali	Shamlai BTM	GPS Hill Bach	Against V/Post
5	Muhammad Hayat	Muhammad Noor	Trand BTM	GPS Kaloata	Against V/Post
6	Noshewan	Noor ul Hassan	Gijbori BTM	GPS Malkot	Against V/Post
7	Zeebal Khan	Mubara Khan	Thakot BTM	GPS Piza Batkool	Against V/Post
8	Duraj Khan	Hukmat Khan	Pokaf Allai	GPS Mangri	Against V/Post
9	Pervez Khan	Saif ullah	Ajmora BTM	GPS Bern Gantar	Against V/Post
10	Imdad Ullah	Musa Khan	Gidri Khairabad BTM	GPS Barmai	Against V/Post
11	Shahi Khan	Bal Khan	Peshora BTM	GPS Mala Bateela	Against V/Post
12	Abdul Aziz	Haji Abdullah	Gulibaugh BTM	GPS Battagram	Against V/Post
13	Muhammad Miskeen	Abdul Lail Khan	Takia BTM	GPS Thaya	Against V/Post
14	Muhammad Riaz	Ghulam Hussain	Banser Shamlai BTM	GPS Koshgram	Against V/Post
15	Khurshed Khan	M. Arshad Khan	Biani Allai	GPS Chapri Karg	Against V/Post
16	Furhad Khan	Mumad	Ajmora BTM	GPS Naihoo	Against V/Post
17	Momin Khan	Bital Khan	Kuzabanda BTM	GPS Nchar Qasim	Against V/Post
18	Islam Shah	Mian Gul Shah	Bandigo BTM	GPS Sar Nasim	Against V/Post
19	Rustam Khan	Palas Khan	Phagora BTM	GPS Ajlay Shahroom	Against V/Post
20	Rustam Khan	Begrah Khan	Thakote BTM	GPS Nelray Thakot	Against V/Post
21	Muhammad Shafia	Aliquliah	Dabri Paimal BTM	GPS Trangar	Against V/Post
22	Anwar Faraz	Abdul Wahab Khan	Banian BTM	GPS Jabba Asharban	Against V/Post

NOTE The Drawing and disbursing officer are directed to verify their Degrees/Certificates from the concerned Board/University/Institutions from the quarter concerned.

TERMS AND Conditions:-

1. The appointment is made purely on temporary basis and liable to termination at any time without assigning any reason or notice.
2. Theirs service will be on regular basis but not pension able and they will contribute to CP Fund.
3. They will be abide by the rules and regulation issued from time to time by the Provincial Govt: XVII, 2012.
4. Their appointment has been made in the Act of Sacked Employees Appointments Act, No Battagram.
5. They should obtain Medical fitness Certificate from the Medical Superintendent DHQ Hospital Battagram.
6. In case of resignation.
7. The candidates having less qualification will acquire requisite training and obtain FA qualification within three years failing which their appointment shall stand terminated automatically.
8. They should take over charge within in 15 days after the issuance of this appointment order otherwise the order of appointment shall stand cancel after 15 days.

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- 9 Charge report should be submitted to all concerned.
- 10 The DDO is directed to obtain an affidavit on stamp paper duly attested by the 1st Class Magistrate that:
 - (a) They will served the Education department for more then five(5) year countinuously .
 - (b) They are not served any other Department/Corporation/Agency.
 - (c). Their previous services if any will be treated as EOL (without Pay).
 - (d) They will not go in the court for their previous service benefits.
- 11 No TA/DA etc. is allowed to any one.

DEPUTY COMMISSIONER
(CHAIRMAN)

BATTAGRAM

Endst:No 7825-31 /EB/AE-II/Appnt:Sacked:Emp: DATED 15/02/2013

- Copy for information and necessary action to the:
- 1 Deputy Commissioner Battagram.
 - 2 Registrar Honorable High court Peshawar
 - 3 District Accounts Officer Battagram.
 - 4 Head Master concerned School.
 - 5 D.D.E.O. (Male) Battagram.
 - 6 Candidates concerned.
 - 7 Office file.

[Signature]
Assistant District Education Officer
Litigation Battagram



**THE KHYBER PAKHTUNKHWA
SACKED EMPLOYEES (APPOINTMENT) ACT, 2012.
(KHYBER PAKHTUNKHWA ACT NO. XVII OF 2012)**

CONTENTS

PREAMBLE

SECTIONS

1. Short title, extent and commencement.
2. Definitions.
3. Appointment of sacked employees.
4. Age relaxation.
5. Sacked employees shall not be entitled to claim seniority and other back benefits.
6. Preference on the basis of age.
7. Procedure for appointment.
8. Removal of difficulties.
9. Act to override other laws.
10. Power to make rules.

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**THE KHYBER PAKHTUNKHWA
SACKED EMPLOYEES (APPOINTMENT) ACT, 2012.**

(KHYBER PAKHTUNKHWA ACT NO. XVII OF 2012)

[first published after having received the assent of the Governor of the Khyber Pakhtunkhwa in the Gazette of Khyber Pakhtunkhwa (Extraordinary), dated the 20th September, 2012].

**AN
ACT**

to provide relief to those sacked employees in the Government service, who were dismissed, removed or terminated from service, by appointing them into the Government service.

WHEREAS it is expedient to provide relief to those sacked employees who were appointed on regular basis to a civil post in the Province of the Khyber Pakhtunkhwa and who possessed the prescribed qualification and experience required for the said post, during the period from 1st day of November 1993 to the 30th day of November, 1996 (both days inclusive) and were dismissed, removed, or terminated from service during the period from 1st day of November 1996 to 31st day of December 1998 on various grounds;

WHEREAS the Federal Government has also given relief to the sacked employees by enactment;

AND WHEREAS the Government of the Khyber Pakhtunkhwa has also decided to appoint these sacked employees on regular basis in the public interest;

It is hereby enacted as follows:

1. Short title, extent and commencement.—(1) This Act may be called the Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012.

(2) It shall apply to all those sacked employees, who were holding various civil posts during the period from 1st day of November, 1993 to 30th day of November, 1996 (both days inclusive).

(3) It shall come into force at once.

2. Definitions.— In this Act, unless the context otherwise requires, the following expressions shall have the meanings hereby respectively assigned to them that is to say,-

- (a) "civil post" means a post created by the Finance Department of Government for the members of civil service of the Province;
- (b) "Department" means the Department and the Attached Department as defined in the Khyber Pakhtunkhwa Government Rules of Business, 1985, including the Divisional and District Offices working thereunder;
- (c) "Government" means the Government of the Khyber Pakhtunkhwa;
- (d) "Prescribed" means prescribed by rules;
- (e) "Province" means the Province of the Khyber Pakhtunkhwa;
- (f) "rules" means the rules made under this Act; and
- (g) "Sacked employee" means a person who was appointed on regular basis to a civil post in the Province of the Khyber Pakhtunkhwa and who possessed the prescribed qualification and experience for the said post at that time, during the period from 1st day of November 1993 to the 30th day of November, 1996 (both days inclusive) and was dismissed, removed, or terminated from service during the period from 1st day of November 1996 to 31st day of December 1998 on the ground of irregular appointments;

3. **Appointment of sacked employees.**— Notwithstanding anything contained in any law or rule for the time being in force, on the commencement of this Act, all sacked employees subject to section 7, may be appointed in their respective cadre of their concerned Department, in which they occupied civil posts before their dismissal, removal and termination from service:

Provided that the sacked employees shall be appointed against thirty percent of the available vacancies in the said Department:

Provided further that the appointment of sacked employees shall be subject to the medical fitness and verification of their character antecedents to the satisfaction of the concerned competent authority.

4. **Age relaxation.**— The period during which a sacked employee remained dismissed, removed or terminated from service, till the date of their appointment shall be deemed to have been automatically relaxed and there shall be no further relaxation under any rules for the time being in force.

5. Sacked employees shall not be entitled to claim seniority and other back benefits.— A sacked employee appointed under section 3, shall not be entitled to any claim of seniority, promotion or other back benefits and his appointment shall be considered as fresh appointment.

6. Preference on the basis of age.— On the occurrence of a vacancy in the respective cadre of the concerned Department of the sacked employee against the thirty percent available share, preference shall be given to the sacked employee who is older in age.

7. Procedure for appointment.—(1) A sacked employee, may file an application, to the concerned Department within a period of six months from the date of commencement of this Act, for his appointment in the said Department:

Provided that no application for appointment received after the due date shall be entertained.

(2) The concerned Department shall maintain a list of all such sacked employees whose applications are received under sub-section (1) in the respective cadres in chronological order.

(3) If any vacancy occurs against the thirty percent available share of the sacked employee in any Department, the senior in age from such sacked employee shall be considered by the concerned Departmental Selection Committee or the District Selection Committee, as the case may be, to be constituted in the prescribed manner, for appointment:

Provided that no willingness or response is received within a period of thirty days, the next senior sacked employee shall be considered for appointment.

(4) The Concerned Departmental Selection Committee or District Selection Committee, as the case may be, will determine the suitability or eligibility of the sacked employee.

(5) If no sacked employee is available against thirty percent vacancy reserved in respective cadre in a Department, then the post shall be filled through initial recruitment.

8. Removal of difficulties.— If any difficulty arises in giving effect to any of the provisions of this Act, the Chief Minister Khyber Pakhtunkhwa may issue such order not inconsistent with the provision of this Act as may appear to him to be necessary for the purpose of removing the difficulty:

Provided that no such power shall be exercised after the expiry of one year from coming into force of this Act.

9. Act to override other laws.—Notwithstanding anything to the contrary contained in any other law or rules for the time being in force, the provisions of this Act shall have overriding effect and the provisions of any other law or rules to the extent of inconsistency to this Act, shall cease to have effect.

10. Power to make rules.— Government may make rules for carrying out the purposes of this Act.

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3115230152



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION ABBOTTABAD

Khyber Pakhtunkhwa (Pakistan)

Higher Secondary School Certificate Examination PROVISIONAL & DETAILED MARKS CERTIFICATE

Roll No: 115230

Group: HUMANITIES

Part - II

Session: 2015 (Annual)

Name: ISLAM SHAH
Father Name: MIAN GULL SHAH
Reg No: 7521AB/MA-intMP13
Institution/
District: BATTAGRAM



has secured the marks shown against each subject in the Higher Secondary School Certificate Examination Part-II held in the month of May/June as a Private Candidate.

Subjects	Marks	Marks Obtained					
		Part-I		Part-II		Total	Marks In Words
		Theory	Pract	Theory	Pract		
English	200	41	-	33	-	74	Seventy-Four
Urdu (Comp)	200	33	-	41	-	74	Seventy-Four
Islamiyat Compulsory	50	19	-	-	-	19	Nineteen
Pakistan Studies	50	-	-	17	-	17	Seventeen
Civics	200	40	-	47	-	87	Eighty-Seven
Islamiyat Elective	200	62	-	61	-	123	One Hundred Twenty-Three
Pashto	200	53	-	73	-	126	One Hundred Twenty-Six

Total: 1100

520-D Five Hundred Twenty Only

Date: 06 August, 2015

Remarks:

Checked By: [Signature]

[Signature]
Controller of Examinations

Note: Errors / Omissions excepted. Any mistake in Name, Father Name etc must be intimated within 30 days of the issuance date of this certificate to BISE Abbottabad. Visit us: www.biseatd.edu.pk

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
PROVISIONAL RESULT CARD



Serial No. 394333

Roll No. BF653867

Name ISLAM SHAH

Registration No. 15NEM00522

Final Semester SPR-2016

Father's Name MIAN GUL SHAH

Address VILLAGE KAKTI PO BANDICO BATTAGRAM

Tehsil BATTAGRAM

District BATTAGRAM

has successfully completed PRIMARY TEACHING CERTIFICATE

The detail of passed courses is as under

Semester	Course Code	Title of Courses	Marks	
			Maximum	Obtained
SPR- 16	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	92
SPR- 16	0617	TEACHING OF URDU	100	56
SPR- 16	0618	TEACHING OF MATHEMATICS	100	79
SPR- 16	0619	TEACHING OF SCIENCES & PHYSICAL	100	75
SPR- 16	0620	TEACHING OF ISLAMIAT & SOCIAL STUDIES	100	65
AUT- 15	0613	PRINCIPLES OF EDUCATION	100	72
SPR- 16	0614	EDUCATIONAL PSYCHOLOGY	100	54
AUT- 15	0615	SCHOOL ORGANIZATION	100	57
AUT- 15	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	65

Credit 5
Result Declared JANUARY 19, 2017
Date of Issue JANUARY 20, 2017

Total Marks/Obtained 900 / 615
Percentage/Grade 68 / B

[Signature]
Controller of Examinations

Disclaimer:
This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

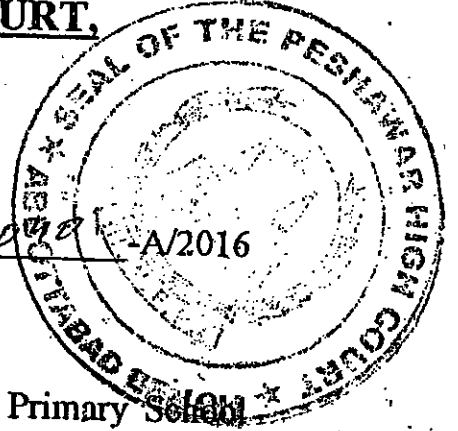


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F

BEFORE THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH

Writ Petition No. 10918 A/2016



Islam Shah son of Mian Gul Shah, presently PST, Govt. Primary School
Garaug, District Battagram.

...PETITIONER

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education Peshawar.
2. Deputy Commissioner, Battagram.
3. District Education Officer (Male), Battagram.
4. Deputy District Education Officer (Male), Battagram.

...RESPONDENTS

Certified to be True Copy
Examiner
Peshawar High Court
Abbottabad Bench
Authorized Under Section 35 Arts. 199 & 200

WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF
PAKISTAN, 1973, AS AMENDED UPTO DATE.

Respectfully Sheweth; -

✓
The petitioner humbly submits as under:-
13/11/16



1. That petitioner was appointed as teaching during the year 1995 where after the services of the petitioner with others who were appointed during the period of 1st Day of 1993 to 31st day of December 1996 were terminated during the year 1997. Copy of appointment letter and termination letter is annexed as Annexure "A" & "B" respectively.

2. That during the year 2009 the Govt. Promulgated Sacked Employee (Reinstatement Ordinance 2010), whereby the services of all the employees terminated during November 1993 to December 1998 were reinstated. Copy of referred Ordinance is appended herewith as Annexure "C".

3. That later on Sacked Employee (Reinstatement) Act 2010 was passed by the legislature and was published. Copy of referred Act is appended herewith as Annexure "D".

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 Examiner
 Peshawar High Court
 Abbottabad Bench
 Authorized Under Sec 75 Acts Ordms

1/27/16

(190)

4. That the Federal Govt. and Provincial Govt. re-instated all employees which are entitled under the law and others were given relief of "Golden Hand Shake".

5. That the Provincial Govt. also after the meeting of Provincial Cabinet on 3rd February 2009, while expediting the matter, Circular vide letter dated 21st February 2009 was also issued.

6. That inspite the afore-referred proceeding and Act referred above, since the respondent No.1 and 3 not consider the reinstatement of the petitioner thus petitioner alongwith others approaches to this Honourable Court through writ petition No. 179-A of 2012, which was disposed of by way of order dated 12/03/2013, thereby the petitioners were reinstated vide office order No. 7825-31 dated 15/02/2013. Copies of writ petition and judgment thereon and copy of letter dated 15/12/2013 are appended herewith as Annexure "E", "F" & "G" respectively.

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Examiner
Peshawar High Court
Abbottabad Bench
Authorized Under Sec 75 Acts Ordinance

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Additional Registrar
Peshawar High Court
Abbottabad Bench
3/11/13

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7. That at the time of reinstatement, the respondents by putting their own fantastic terms and conditions i.e "in the order vide Annexure "G" acted without lawful authority thereby bypass the KPK Act No. XVII of 2012" relating to the reinstatement of sacked employee.

8. That now the respondents No.3 & 4 without any notice stopped the monthly salary of the petitioner w.e.f September 2016, on objection the respondent is referring the entry in pay role system for the month of September 2016 which reveals as under,

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B
Examiner
Peshawar High Court
Abbottabad Bench
authorized Under Sec 5 of the Ordinance

"Pay stopped w.e.f September 2016 due to decision of Deputy Commissioner and EDO (Male) Battagram as he has not finalize the PTC + F.A in three years".

Copy of referred pay role system for the month of September, 2016 is appended herewith as Annexure "H".

9. That since the terms and conditions and entry and pay roll system for the month of September 2016 on the decision of

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h
Additional Registrar
Peshawar High Court
Abbottabad Bench
3/11/16

(42)

respondents is against the law and having been impose without lawful authority therefore, the same is hereby called in question on the grounds, set below;

GROUND: -

- a) That the terms and condition are against the law and especially against the "Reinstatement Act of Sacked Employee Act 2012".
- b) That since the petitioner, was reinstated in view of afore-referred Act, and after the reinstatement the new terms and conditions, cannot be impose.
- c) That the reinstatement of the petitioner is in fact under the law on the existing terms and condition which was set at the time of his original appointment.

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Examiner
Peshawar High Court
Additional Bench
Authorized Under Section 15 Act 6 of 1973

3/11/16

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- d) That the petitioner rendered his major span of his life in his present and will face rigorous in case of his termination.
- e) That on the other hand the petitioner achieved the terms and condition and fulfill it and he is waiting the result of PTC last semester otherwise the F.A certificate is completed. Copy of F.A certificate with the result card of PTC are appended herewith as Annexure "I" & "J".
- f) That the conduct of the respondents is against the fundamental rights and respondents act is discriminatory towards the petitioners.
- g) That the respondents are bond to act under the law and they are bond to act while keeping in view Article (4) of the Constitution of Islamic Republic of Pakistan, 1973.

Certified to be True Copy.

EX-10151
Peshawar High Court
Abbottabad Bench
Authorized Under 1975 Act's Ordinance

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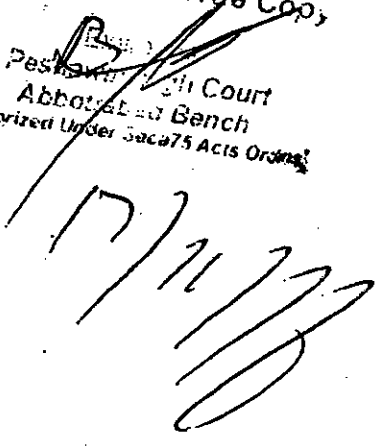
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h) That the petitioner is still performing his duty with the entire satisfaction and during this period the petitioner got sufficient experience and job skill and as well as aware about latest method of teaching.

i) That since at the time of reinstatement no hard copy of reinstatement order was handed over to the petitioner, therefore, petitioner remained unaware the impugned term and condition in black and white.

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Peshawar High Court
Abbottabad Bench
Authorized Under Section 75 Acts Ordinance



j) That the afore-referred Act reveals that is nothing about imposition of any condition against the appointment thus the condition impose in order vide Annexure "G" is coram-non-judice, having been impose without lawful authority.

k) That there is no other alternate, efficacious remedy available to

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13/11/16

(64)

petitioner except the instant writ petition.

- l) That notice/ intimation of filing the instant writ petition against the respondents has duly been served upon the respondents through registered post. Copies of notice & receipts are attached as Annexure "K".
- m) That addresses of the parties have correctly been mentioned in the heading of the petition.
- n) That the court fee stamp paper worth Rs. 500/- is appended herewith.
- o) That other grounds shall be urged at the time of arguments.

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 Examiner
 Peshawar High Court
 Abbottabad Bench
 Authorized Under Sec 75 Acts Ordms)

[Handwritten signature]

In the giving circumstances, it is therefore, humbly prayed that on acceptance of instant writ petition this Honourable Court may kindly be direct the respondents; -

[Handwritten signature]



A) To undo the term and condition i.e
 "The candidate having less
 qualification will acquire requisite
 training and obtain F.A/ PTC
 qualification within three years failing
 which their appointment shall stand
 terminated automatically.

B) To issue direction to the respondents
 to release the monthly pay of
 petitioner from September 2016 to till
 now.

C) Not to take any adverse action against
 the petitioner.

D) Any other relief to which the
 petitioner is deemed entitled including
 the extension of time for waiting the
 result of last semester of PTC may
 also be granted in the interest of
 justice.

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Examiner
 Peshawar High Court
 Abbottabad Bench
 Authorized Under Sec 75 Act's Ordms

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Additional Registrar
 Peshawar High Court
 Abbottabad Bench

3/14/16

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INTERIM RELIEF; -

The respondent No.3 may kindly be directed to release the monthly pay of petitioner w.e.f September 2016 to till now and not to take any adverse action against the petitioner.

[Signature]

...PETITIONER

Dated: 26/11/2016

Through

[Signature]

(Malik Masood ur Rehman Awan)
Advocate Supreme Court of Pakistan,
Abbottabad

VERIFICATION:-

Verified on oath that the contents of forgoing writ petition are true and correct to the best of our knowledge and belief and nothing has been concealed therein from this Honourable Court.

[Signature]

...PETITIONER

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[Signature]
Peshawar High Court
Abbottabad Bench
Authorized Under Sec 75 Acts Ord

FILED TODAY

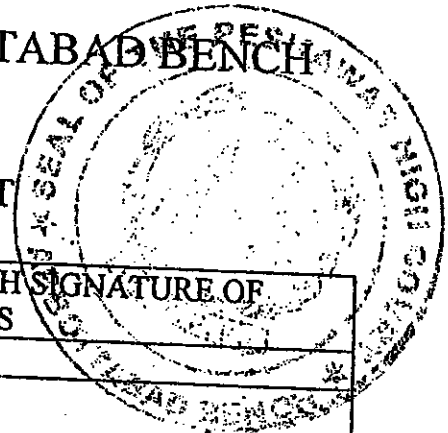
d
Additional Registrar
Peshawar High Court
Abbottabad Bench

13/11/16

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PESHAWAR HIGH COURT, ABBOTTABAD BENCH

FORM 'A'
FORM OF ORDER SHEET



Date of Order or Proceedings	ORDER OR PROCEEDINGS WITH SIGNATURE OF JUDGE/JUDGES
1	2
15.11.2016	<p><u>W.P No.1040-A/2016.</u></p> <p>Present: Malik Masood-ur-Rehman Awan, Advocate, for petitioner.</p> <p style="text-align: center;">***</p> <p>Comments of respondents No.2 and 3 be called for so as to reach this Court within a fortnight.</p> <p><u>Interim Relief.</u></p> <p>Notice for 06.12.2016. In the meanwhile if the petitioner is actually performing his duty then his salary for the current month be released forthwith.</p> <p style="text-align: right;"><i>[Handwritten Signature]</i></p>

Certified to be True Copy

[Signature]
Examiner

Peshawar High Court
Abbottabad Bench

Authorized Under Sec 75 of the Ordinance

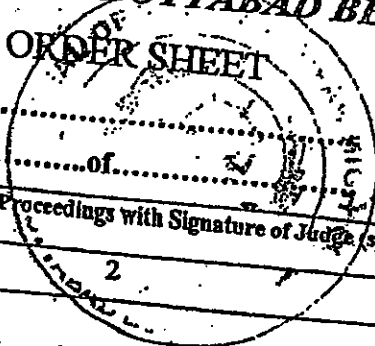
(Ayub)

copy of order
14-2-17

PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET

Court of.....
Case No.....



Date of Order of Proceedings	Order or other Proceedings with Signature of Judge (s)
1	2
14.02.2017	<p><u>W.P.No. 859-A/2016.</u></p> <p>Present: Malik Masood-ur-Rehman Awan, Advocate, for the petitioner.</p> <p>Mr. Rab Nawaz Khan, AAG alongwith Haq Nawaz ADEO Battagram.</p> <p>***</p> <p><u>IKRAMULLAH KHAN, J.-</u> Through the instant petition the petitioners of this and of the connected petitions have prayed for to undo the term and condition i.e. "the candidate having less qualification will acquire requisite training and obtain F.A qualification within three years failing which their appointment shall stand terminated automatically" and not to take any adverse action against the petitioners.</p> <p>2. The main thrust of the arguments of learned counsel for the petitioners was that similarly placed employees have been reinstated under the Sacked-Employee (Reinstatement) Act 2010, who are presently performing their duties while the services of the petitioners have been terminated which is sheer malafide on part of the respondents rather discrimination. Further stated that many of the petitioners have already acquired the requisite qualification as well as the training, but even then their services have been terminated on extraneous reasons.</p> <p>3. In such view of the matter, when serious question of</p>

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EXAMINER
Peshawar High Court, Abbottabad Bench
Authorized Under Sec: 75 Evid Ordns:

17/02/17
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minutes

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Attendee

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discrimination is being raised vehemently by the petitioners and they have also put some orders which reveal that the respondents have not adopted a uniform policy, we, with the mutual consent of the learned counsel for the parties, deem it appropriate to send all these petitions to the Secretary Education (Elementary & Secondary Education) Government of Khyber Pakhtunkhwa with direction to him to probe into the matter and finalize the appointment or otherwise of the petitioners as well as of those, who have not approached this court, through a uniform policy and if possible, after giving benefit of experience to the petitioners, their cases be disposed of within thirty (30) days from today. In case any person was found aggrieved from the order of the worthy Secretary Education then, he would be at liberty to approach the competent court of jurisdiction for redressal of his grievance. In the meanwhile, all those petitioners, who are still serving, shall be paid their due salaries till the decision of the worthy Secretary Education. All these petitions stands disposed of accordingly.

Self Judge
Self Judge

Certified to be True Copy

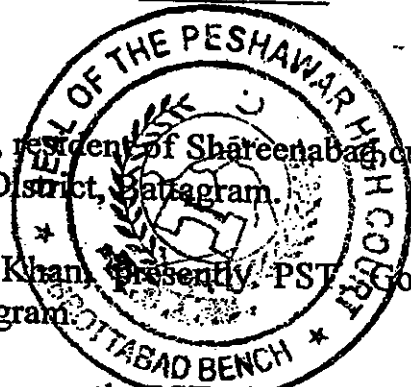
EXAMINER
Peshawar High Court Abbottabad Bench
Authorized Under So: 75 Evid Ordns:
17/02/17

**Self **



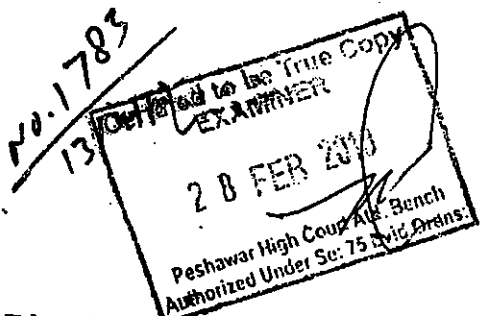
BEFORE THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH

COC No. 25 -A/2017



1. Imdadullah Khan son of Musa Khan, resident of Shāreenabad cum Kuza Banda, P.O Ghidari, Tehsil & District, Battagram.
2. Bahadur Khan son of Ali Gohar Khan, presently PST, Govt. Primary School Kanai, District Battagram.
3. Islam Shah son of Mian Gul Shah, presently PST, Govt. Primary School Garaug, District Battagram.
4. Masoom Khan son of Muhammad Naqab, presently Drawing Master (DM), Govt. Middle School, Garhi Nawab Syed, District Battagram.
5. Muhammad Shafiq son of Atiqullah, presently PST, Govt. Primary School Dabri Paimal, District Battagram.
6. Noshervan son of Noor ul Hassan, presently PST, Govt. Primary School Malkot, District Battagram.

...PETITIONERS



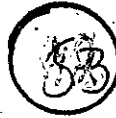
VERSUS

Riaz Swati, District Education Officer (Male), Battagram.

...RESPONDENT/ CONTEMNOR

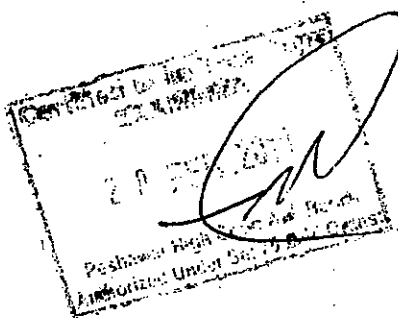
APPLICATION UNDER ARTICLE 204 OF
THE CONSTITUTION OF ISLAMIC REPUBLIC
OF PAKISTAN, 1973, FOR INITIATING

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH



CONTEMPT PROCEEDINGS AGAINST THE
RESPONDENT/ CONTEMNOR FOR NOT
IMPLEMENTING CONSOLIDATED
JUDGMENT/ ORDER DATED 14/02/2017
PASSED BY THIS HONOURABLE COURT IN
WRIT PETITION NO.859-A/2016 ALONGWITH
OTHER CONNECTED WRIT PETITIONS
NO.1038-A/2016, 1039-A/2016, 1040-A/2016,
1041-A/2016 AND 1042-A/2016.

PRAYER: ON ACCEPTANCE OF THE
INSTANT APPLICATION, RESPONDENT/
CONTEMNOR MAY GRACIOUSLY BE
PUNISHED IN ACCORDANCE WITH LAW
AND BE ALSO DIRECTED TO IMPLEMENT
THE CONSOLIDATED JUDGMENT PASSED
IN WRIT PETITION NO.859-A/2016 PASSED
ON 14/02/2017.



Respectfully Sheweth;-

1. That the petitioners filed writ petitions bearing No.859-A/2016, 1038-A/2016, 1039-A/2016, 1040-A/2016, 1041-A/2016

FILED TODAY

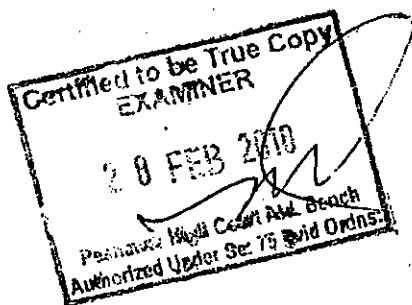
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT



and 1042-A/2016 before this Honourable Court, where this Honourable Court on 14/02/2017 disposed off the all these petitions by way of consolidated judgment/ order passed in writ petition No.859-A/2016 alongwith other connected writ petition. Attested copies of the writ petition No.859-A/2016 and judgment dated 14/02/2017 are attached as Annexure "A" & "B".

2. That after passing of the judgment/ order inspite the fact that this Honourable Court clearly directed the respondent in the following terms under paragraph No.3 of the judgment, which is as under;-

"In such view of the matter, when serious question of discrimination is being raised vehemently by the petitioners and they have also put some orders which reveal that the respondents have not adopted a uniform policy, we, with the mutual consent of the learned counsel for the parties, deem it appropriate to send all these petitions to the Secretary Education (Elementary &



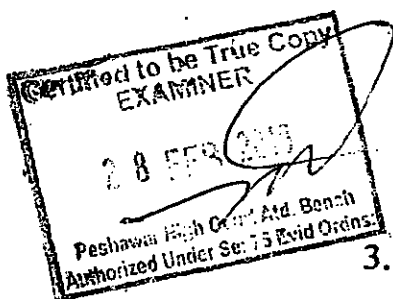
FILED TODAY

**ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
APPROPRIATE OFFICE**

C 131916



Secondary Education) Government of Khyber Pakhtunkhwa with direction to him to probe into the matter and finalize the appointment or otherwise of the petitioners as well as of those, who have not approached this Court, through a uniform policy and if possible, after giving benefit of experience to the petitioners, their cases be disposed off within thirty (30) days from today. In case any person was found aggrieved from the order of the worthy Secretary Education then, he would be at liberty to approach the competent court of jurisdiction for redressal of his grievance. In the meanwhile, all those petitioners, who are still serving, shall be paid their due salaries till the decision of the worthy Secretary Education. All these petitions stands disposed off accordingly”.



3.

That the petitioners are still performing their duties as assigning to them. Copies of abstract from attendance register are appended herewith as Annexure “C”.

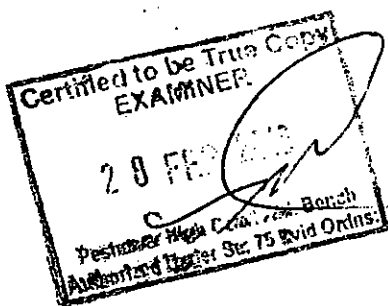
FILED TODAY

ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH

2/13/13

(96)

4. That after receiving the consolidated judgment/ order passed by this Honourable Court on 14/02/2017 in writ petition No.859-A/2016, worthy Secretary (Elementary & Secondary Education), Khyber Pakhtunkhwa convened a meeting and thereby issued the following recommendation on 10/03/2017. Copy of minutes of the meeting are appended herewith as Annexure "D".
5. That the petitioners are still waiting for implementation of the recommendation made during the meeting held on 10/03/2017 vide Annexure "D".
6. That the respondent/ contemnor is duty bound to implement the judgment/ order of this Honourable Court since the petitioners are still performing their duties which is apparent vide Annexure "C" to release the salary of all the petitioners but inspite having the knowledge regarding the release of salary, the respondent/ contemnor is not



FILED TODAY

**ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH**

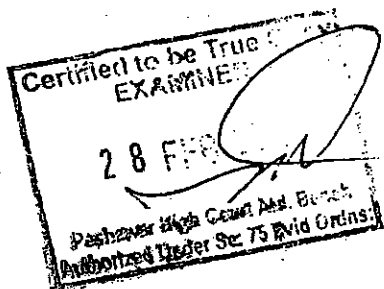
28/3/2018

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obeying the order/ judgment passed by this Honourable Court on 14/02/2017.

7. That the respondent/ contemnor has willfully, knowingly, intentionally and deliberately not obeyed above quoted direction of this Honourable Court and has subjected the petitioner to total confusion, pain and agony as the contemnor intend to willfully subvert such direction and hence his conduct clearly falls within the purview of Article 204 of the Constitution of Islamic Republic of Pakistan and therefore is needed to be punished in an exemplary manner as a lesson.

8. That the conduct of the respondent/ contemnor in highly contemptuous, contumacious and regrettable in willfully, knowingly and deliberately not obeying clear direction passed by this Honourable Court in the titled writ petitions and hence he is liable for maximum punishment for his conduct as provided by law.



~~FILED~~ TODAY

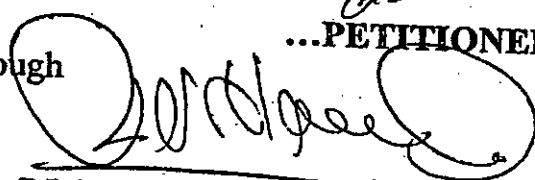
ADDITIONAL REGISTRAR
PESHAWAR

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9. That the valuable rights of petitioners are involved.

It is, therefore, humbly prayed that on acceptance of the instant application, respondent/ contemnor may graciously be punished in accordance with law and be also directed to implement the consolidated judgment passed in writ petition No.859-A/2016 passed on 14/02/2017.


Dated: 12/04/2017

Through  ...PETITIONERS
(Malik Masood ur Rehman Awan)
Advocate Supreme Court of Pakistan,
Abbottabad

VERIFICATION:

Verified that the contents of foregoing petition are true and correct to the best of my knowledge and belief and nothing has been suppressed from this Honourable Court.

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD
2/3/17

 ...PETITIONER
Certified to be True Copy
EXAMINER
2-8
Peshawar High Court
Authorized Under Sec. 75

ماہواری P.T.C - P.S. ڈانچا کا اجلاس -

مورچہ ۱ - 6-11-2016

وقت ۱۰ بجے صبح

مقام ۱۔ گوڈھنٹ پرائمری سکول ڈانچا -

ایجنڈا ۱۔ اختران بالا سے نائب مدرس اسلام شاہ PST

۲. P.S. ڈانچا کی واہ گزاری کی اپیل -

آ۲ بجارخ بالا کو سکول ہذا کا ماہواری P.T.C اجلاس زیر صدارت

چیرمین P.T.C عمران و معززین علاقہ منعقد ہوا -

اجلاس کا آغاز باقاعدہ تلاوت کلام پاک سے ہوا۔ تلاوت کے بعد چیرمین عبدعزیز
و معززین علاقہ کا شکریہ ادا کرتے ہوئے۔ اس بات پر انتہائی افسوس سے درود دیا
کہ یہاں سکول ہذا کا نائب مدرس جناب اسلام شاہ P.S. ڈانچا کی بدستور ماہ اگست

2016ء سے تنخواہ بند کی گئی ہے۔ چونکہ مدرس بہت عاصم باش اور مرض شناس ہے۔
اپنے بچے سے انتہائی لگاؤ رکھتا ہے۔ علمی درس و تدریس قابل دید اور قابل تعریف بھی ہے۔
تنخواہ مسلسل بند ہونے کی صورت میں اس کا اثر مدرس کے گھریلو اخراجات پر پڑھتا ہے
جو کہ مدرس کے دلچسپی کا سبب بن گیا ہے۔ ہم P.T.C عمران اور علاقے کے لوگ مدرس کی ڈیوٹی انتہائی
دشمنی اور خوش ہیں۔

لہذا اختران بالا کو عافران اپیل کرتے ہیں کہ مذکورہ

مدرس کی تنخواہ واہ گزاری کے دلچسپی کا ازالہ کیا جائے بصورت دیگر اس کا اثر یہاں

نوٹینال ۱۰۰۰ کی تعمیر پرائمری سکول ہوگا۔ اور نوٹینالوں کی مستقل انحصار ہو جائے گا۔

عبدالعزیز

چیرمین P.T.C حقیق کریم P.S. ڈانچا

دستخط سکریٹری
RANJA

محمد بن شافعہ کارکن و مواصل

س
حوالہ

شافعہ مکر

① محمد بن شافعہ الحسن =

0313-5818792 — 13202-3994151-3

0313-5909433 — 13202-0769808-5

② محمد فقیر خان =

0311-4625355 — 13202-3055581-5 = ③ و عبداللہ

0342-9530854 — 13202-0752568-1 — ④ دلہر خان

0307-5635410 — 13202-1792069-1 — ⑤ اسرائیل

0344-9535913 — 13202-07696612-7 ⑥ محمد بن دادہ

کارکردگی سرٹیفکیٹ

میں سہمی اسلام شاہ PST ٹائپ مدرسے EPS راجھا کی تصدیق
 کرتا ہوں کہ وہ انتہائی حاضر باش اور فزض شناس ہیں۔ اور اپنے
 پیشے سے انتہائی لگاؤ رکھتے ہیں۔ ان کی درس و تدریس
 قابل دید اور قابل تعریف ہے۔ - PTC عمران اور علقہ کے لوگ
 اس سے بے حد متاثر اور مطمئن ہیں۔ رپورٹ مرض عدوت ہے۔

الف

صحبت خان PSH EPS راجھا تحصیل و ضلع سگرم

0301-8030227
 03-12-2016
 G.P.S. ...
 Teh. Dist. Bannu

کارکردگی سرٹیفکیٹ (69)

لصرف کیجائی ہے کہ میں اسٹیم شاہ ۱/۱۰ میان گل شاہ

PST EPS - رانجا میں نچھت نائٹ مدرس

تعمینات ہے - جوان العمر اور حاضر باش ہے -

اپنے پستے سے انتہائی لگاؤ رکھتا ہے -

حسن کی درس و تدریس قابل تعریف اور

قابل دیر ہے - رپورٹ عرض خدمت ہے

الغیر

حیدر بیگم EPS - رانجا
تعمینات حاصل شد

HEAD TEACHER
G.P.S. RANJA
Tad, Distt Sategram

24/10/2016

63

نام سید احمد شاه 4P: کوڑا

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425 تا 335

نورانی - گدالہ سردار
خالو کوڑا

حلقہ - ٹانگہ 7 سندھ - سیم کوڑا - بیج بندو

شاہ کوڑا

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03025646967 ایفام الز

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EASED

(64) Duty Certificate

Certified that Mr Islam Shah DST GDS Ranja
has performed his duty in SNID (Patio program)

WEF From one year till on word -

And also performed in recent SNID 23/11/2016 to 26/11/2016

Habibullah Rahman
SNIT

Zuhir Khan
EPI Tci AIC
By 26/11/2016

UPEC Chairman
YL Benia

✓

رجسٹر حاضری مدرسین گورنمنٹ پرائمری سکول راولپنڈی

نام		عہدہ		تاریخ آمد		2016		ابتداء		انتهاء		نمبر	
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دستخط ہیڈ ماسٹر

رجسٹر حاضری مدرسین
گورنمنٹ پرائمری سکول راجھنہ

2016

نام	صوبہ	پست	نورالرضن
عہدہ	P.S.H.T	P.S.T	جو کیدار

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
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استحقاقی							
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میزان	2	5					

دستخط ہیڈ ماسٹر

دستخط

جسٹر حاضری مدرسین گورنمنٹ پبلک سکول راجھا

2016														
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عہدہ			روزگار			PST			P.S.H.T			عہدہ		
تاریخ	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	تاریخ	
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قسم رخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
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انتظامی												
بیماری												
میزان						2						3

دستخط ہیڈ ماسٹر



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DISTRICT BATTAGRAM

Email: emisbattagram@gmail.com Ph# 0997-543539/ 543540



OFFICE ORDER

- 70
1. Whereas you the following Ex PSTs (Sacked Employee) were appointed vide order Endst; No. 7825-31 dated 15-02-2013 in the light of Khyber Pakhtunkhwa Sacked Employees (Appointment) Act-2012 with the condition that "The candidates having less qualification will acquire requisite training and obtain FA qualification within three (03) years-failing which their appointments shall stand terminated automatically" incorporated in your appointment order in the light of order dated 25-05-2011 of Hon'ble Supreme Court of Pakistan in Civil Appeals No. 51-P and 52-P of 2009 as "The appellants shall be appointed as P.S.T (Primary School Teacher) in their respective Union Councils immediately and in case the appellants fail to acquire the training and the said qualification within three years, their appointment shall stand terminated automatically".
 - i. Bahadar Khan S/O Ali Gohar Khan Ex PST GPS Mukhtiar Abad
 - ii. Muhammad Hayat S/O Muhammad Noor Ex PST GPS Landi Kass
 - iii. Noshervan S/O Noorul Hassan Ex PST GPS Malkot
 - iv. Zebal Khan S/O Mubaras Khan Ex PST GPS Piza Batkool
 - v. Imdadullah Khan S/O Musa Khan Ex PST GPS Barmai
 - vi. Shahi Khan S/O Bai Khan Ex PST GPS Peshora
 - vii. Muhammad Riaz S/O Ghulam Husain Ex PST GPS Tringar
 - viii. Khurshid Khan S/O Muhammad Arshad Khan Ex PST GPS Deshwal
 - ix. Islam Shah S/O Mian Gul Shah Ex PST GPS Ranja
 - x. Rustam Khan S/O Palas Khan Ex PST GPS Sangu
 - xi. Rustam Khan S/O Begrah Khan Ex PST GPS Nerai Thakot
 - xii. Muhammad Shafiq S/O Atiqullah Ex PST GPS Chattoo
 2. And whereas you failed to fulfill terms and conditions of your appointment order i.e could not acquire requisite qualification within stipulated period of three years as per condition No. 7 of your appointment order, resultantly your appointments/services stood terminated automatically.
 3. And whereas a general Notification Endst; No. 137-43 dated 04-01-2017 was issued/circulated wherein it was clarified that, "those (Sacked Employees) who failed to fulfill the requisite qualification for the post within stipulated period of three years from the date of issuance of their appointment orders, their services stood terminated automatically and they are no more civil servants/on the strength of Department".
 5. And whereas you filed Writ Petitions before Peshawar High Court Abbottabad Bench which were disposed of on 14-02-2017 with the direction to Secretary E&SE Khyber Pakhtunkhwa for making a uniform policy.
 6. And whereas in compliance with the directions of Hon'ble Court dated 14-02-2017, all the DEOs (Male & Female) were directed by the E&SE Department Khyber Pakhtunkhwa vide letter No. SO (Lit-1) E&SE/1-1/2017/Sacked Employees dated 10-11-2017 to follow strictly the provision as mentioned in Sections-2(g), 3 and 7 of Khyber Pakhtunkhwa Sacked Employees (Appointment) Act-2012.
 7. And whereas you filed Contempt of Court Petitions before the Hon'ble court which were disposed of on 11-01-2018 with the direction to undersigned to decide the case of petitioners within 30 days.
- SECRET

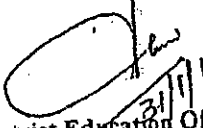
Now in the light of direction of Hon'ble Peshawar High Court Abbottabad Bench dated 11-01-2018, the undersigned is pleased to decide your case and to issue this order in continuation of Notification dated 04-01-2017 that as per condition No. 7 of your appointment order and in the light of Judgment of Peshawar High Court Abbottabad Bench dated 24-05-2016 in W.P NO. 516-A of 2013 as well as order of Hon'ble Supreme court of Pakistan dated 24-05-2017 in C.P. 401 and connected Petitions. your services had stood terminated automatically and you remained no more on the strength of this Department.

District Education Officer (Male)
Battagram
Dated. 31-01-2018

Endst: No.1305-10/EB/Pr/Sacked Employees.

Copy for information to the.

1. Additional Registrar Peshawar High Court Abbottabad Bench.
 2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
 3. Deputy Commissioner Battagram.
 4. District Monitoring Officer (IMU) Battagram.
 5. Sub Divisional Education Officers (Male) Battagram & Allai.
- of the above mentioned Ex PSTs.


31/1/18
District Education Officer (Male)
Battagram

No. 553

72

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Received a registered* addressed to

H. H. H. H.

Date Stamp

Initials of Receiving Officer *Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (in figures)

(in words)

If insured

Insurance fee Rs. Ps.

Weight } Kilo Grams

Name and address of sender

No. 554

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Rs. Ps.

Received a registered* addressed to

P. H. S. S. S.

Date Stamp

Initials of Receiving Officer *Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (in figures)

(in words)

If insured

Insurance fee Rs. Ps.

Weight } Kilo Grams

Name and address of sender

No. 555

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Rs. Ps.

Received a registered* addressed to

H. H. S. S. S.

Date Stamp

Initials of Receiving Officer *Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (in figures)

(in words)

If insured

Insurance fee Rs. Ps.

Weight } Kilo Grams

Name and address of sender

No. 556

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Rs. Ps.

Received a registered* addressed to

K. U. S. S. S.

Date Stamp

Initials of Receiving Officer *Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (in figures)

(in words)

If insured

Insurance fee Rs. Ps.

Weight } Kilo Grams

Name and address of sender

73

N 11-1325

No. 560

For Insurance Notices see reverse.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgement is due.



Received a registered*
addressed to _____

Date Stamp

Initials of Receiving Officer _____
*Write here "letter", "postcard", "packet" or "parcel"
with the word "insured" before it when necessary.

Insured for Rs. (in figures) _____ (in words) _____

Insurance fee Rs. _____ Ps. _____ (in words) }
Weight } Kilo
Grams } 1/3

Name and
address
of sender } _____

خدمت جناب ڈائریکٹر صاحب محکمہ تعلیم سیکنڈری ایجوکیشن، پشاور

حکمانہ اپیل

جناب عالی!

سائیلان حسب ذیل عرض رساں ہیں۔

گزارش کی جاتی ہے کہ سائیلان سال 1993 و 1994 میں بھرتی ہوئیں ہیں اور تقریباً چار سال بعد سیاسی طور پر پشاور میں سائیلان کو برطرف کیا گیا۔ صوبائی حکومت نے 2012 میں ایک ایکٹ پاس کیا جس کے تحت 2016 میں سائیلان کو دوبارہ سروس پر بحال کر دیا گیا۔ آرڈر ایشو ہوتے وقت جناب ڈی۔ ای۔ او صاحب نے ایکٹ سے منسلک اپنی طرف سے تین سال میں پی۔ ٹی۔ سی اور ایف۔ اے کی شرائط رکھ دی اور اس دوران پی۔ ٹی۔ سی اور ایف۔ اے عمل کرنے کی سورت میں تین سال بعد خود بخود دوسروں سے ٹرمینٹ تصور کیا جائیگا۔

جناب عالی!

سائیلان نے پی۔ ٹی۔ سی اور ایف۔ اے چار ماہ بعد مکمل کی جبکہ جناب ڈی۔ ای۔ او صاحب بنگرام نے اپنی کی تخوا میں اگست 2016 سے بند کر دی۔ سائیلان ابھی تک اپنی ڈیوٹیاں سرانجام دے رہے ہیں جبکہ جناب ڈی۔ ای۔ او صاحب بنگرام نے مورخہ 31/01/2018 کو سائیلان کے ٹرمینشن آرڈر جاری کر دیئے۔ سائیلان ایک کنڈ اور انجمنی فریب مائے اور غریب گھرانوں سے تعلق رکھتے ہیں اور سائیلان کے کندوں پر خاندان کی تمام ذمہ داریاں سائیلان کے پاس کوئی دوسرا آمدن کا ذریعہ نہیں ہے۔ سائیلان کے پاس اپنے تمام مکمل مطلوبہ کوائف موجود ہیں۔

لہذا حضور سے استدعا ہے کہ سائیلان کو چار ماہ کی پی۔ ٹی۔ سی لیٹ پاس کرنے کی رعایت فرمائی جائے اور ہماری تخوا میں اور سروس بحالی کی اجازت دی جائے سائیلان اور سائیلان کا خاندان تاحیات دعا گو رہے گا۔

(الرقوم: 16/03/2018)

سائیلان اور خواست گزاران

ببادر خان پی ٹی سی / ایف اے / جی پی ایس، بختیار آباد (0306-5640241)

محمد شفیق پی ٹی سی / ایف اے / جی پی ایس، چنوں (0336-1153533)

اسلام شاہ پی ٹی سی / ایف اے / جی پی ایس، رانجھا (0310-5267104)

نوشیروان پی ٹی سی / ایف اے / جی پی ایس، ملکوت (0301-8123642)

اد ادا اللہ پی ٹی سی / ایف اے / جی پی ایس برمائے (0344-9155463)

موسوم خان DM، ایف اے / جی پی ایس گڑھی نواب سید (0300-9712967)

تحصیل و ضلع بنگرام ہزارہ

DEPT. OF EDUCATION
PESHAWAR

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)

BATTAGRAM

753 /EB/Pry Dated

Battagram: 18/05/2018

76

The Director
(E&SE) Khyber Pakhtunkhwa
Peshawar.

Subject:- DEPARTMENTAL APPEAL.

Memo:-

Reference Copy of appeal (Attached)

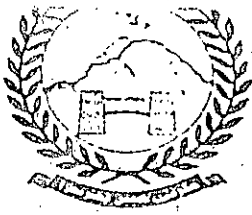
1. The following appellants Ex-PSTs (Sacked Employees) were appointed vide order Endst No.7825-31 Dated 15/02/2013 in the light of Khyber Pakhtunkhwa Sacked Employees (Appointment) Act-2012 with the condition that "The candidates having less qualification will acquire requisite training and qualification intermediate within three (03) years failing which their appointments shall stand terminated automatically".(Appointment Order attached A-1)
2. The appellants failed to fulfill terms and conditions of their appointment order i.e. could not acquire requisite qualification within stipulated period of three years as per condition No.7 of their appointment order.(Appointment Order attached A-1)
3. The appellants filed contempt of Court Petitions of Hon,ble court which were disposed of on 11/01/2018 with the direction to undersigned to decide the case of petitioners within 30 days.
4. In the light of direction of Hon,ble Peshawar High Court Abbottabad Bench dated 11/01/2018, the undersigned is pleased to decide the case and to issue order in continuation of Notification dated 04/01/2017. that as per condition No.7 of their appointment order and in the light of judgment of Peshawar High Court Abbottabad Bench dated 24/05/2016 in W.P No.516-A of 2013 as well as order of Hon,ble Supreme Court of Pakistan dated 24/05/2017 in C.P. 401 and connected petitions, The services had stood terminated automatically and they remained no more on the strength of this Department vide order No: 13503-10/EB/Pry/Sacked Employees dated 31-01-2018.(Copy attached B-1)
5. Position of acquiring qualification of the following appellants is as under.

S N O	NAME	ORDER DATE	PASSING FA	DEEDLINE FOR ACQUIRING ACAD/PROF QUALIFICATI ON PASSING PTC	DATE OF PASSING PTC	DIFFERENCE BETWEEN PASSING PTC/ACQUIR E TIME	Remarks (Documents Attached and marked as)
1	Bahadar Khan	15-02-2013	1993	14-02-2016	10-01-2017	08 Months 27 days	C-1 to C-11
2	Muhammad Shafiq	15-02-2013	05-12-2014	14-02-2016	10-01-2017	08 Months 27 days	D-1 to D-6
3	Islam Shah	15-02-2013	06-08-2015	14-02-2016	10-01-2017	08 Months 27 days	E-1 to E-6
4	Nosharwan	15-02-2013	05-12-2014	14-02-2016	10-01-2017	08 Months 27 days	F-1 to F-7
5	Imdadullah	15-02-2013	-	14-02-2016	12-01-2015	-	G-1 to G-12
6	Masoom Khan DM	15-02-2013	26-02-2015 BA	14-02-2016	20-02-2015 DM	Differenc e. between DM/BA 6 days-	H-1 to H-8

In view of the above, the case of the appellants is submitted for perusal and further process please.

DISTRICT EDUCATION OFFICER
(MALE) BATTAGRAM

20/5/18



**OFFICE OF THE
DISTRICT EDUCATION OFFICER
(MALE) BATTAGRAM**

79

NO 11730-14 Dated: 19/10/2018

To

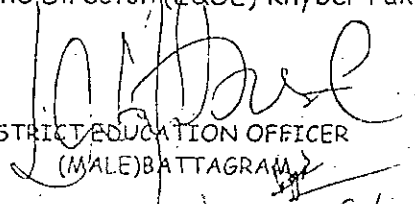
The Appelants

1. Bahadar Khan Ex-PST Village Dharian Tehsil & District Battagram.
2. Muhammad Shafiq Ex-PST Village Dabrai Paimal Sharif Tehsil & District Battagram
3. Islam Shah Ex-PST Village Kaktai (Bandigo) Tehsil & District Battagram.
4. Masoom Khan Ex-DM Village Gijbori Tehsil & district Battagram.
5. Imdad Ullah Ex-PST Village Gidri Shireen Abad Tehsil & District Battagram.

Subject:- DEPARTMENTAL APPEAL.

Memo:-

Reference Director (E&SE) Khyber Pakhtunkhwa Peshawar No.2508 F.No. Sacked Employees of District Battagram Dated Peshawar the. 26/9/2018 on the subject cited above, you are hereby inform that your joint appeal has already been rejected and your joint review appeal dated nil has been filed by the Director (E&SE) Khyber Pakhtunkhwa Peshawar.


DISTRICT EDUCATION OFFICER
(MALE) BATTAGRAM


19/10/18

EndstNo _____ EB /Pry F: Term of Sacked Employees Dated _____ 2018.

Copy for information:-

1. Director (E&SE) Khyber Pakhtukhwa Peshawar.

dist: No 848-52 dt 22-10-2018


DISTRICT EDUCATION OFFICER
(MALE) BATTAGRAM

Forwarded in original to
DEOs Concerned for further n/a
Inform the above Ex-PSTs in time.

SDEO (MALE)

Battagram

کورٹ فیس

وکالت نامہ

بعدالت سروس ٹریڈنگ اینڈ انورسٹمنٹ کمپنی
 عنوان: اسلام شاہ پیم گورنمنٹ آف پاکستان کراچی
 منجانب: سائل امری
 نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے جبری و حجاب و بی نکل کاروائی متعلقہ آن مقام

مسلمہ والہ رحمان الخوال اللہ وکالت طبرک کورٹ

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کہ مقدمہ کی نکل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقریر ثابت و فیصلہ بر طرف دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دخل کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی نکل یا کسی جبری کارروائی کے لئے کسی اور وکیل یا عاقل صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقریر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پر داختم مجھ کو منظور قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہر جانہ اتوائے مقدمہ کے سبب ہوگا اس کے سختی وکیل صاحب ہوں گے۔ نیز جہاں رقم وصول کرنے کا بھی اختیار ہوگا اگر کوئی قرضی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ جبری مقدمہ مذکورہ کریں اور اگر عاقل مقرر کردہ میں کوئی جزو جہاں ہو تو وکیل صاحب موصوف مقدمہ کی جبری کے پابند ہوں گے۔ نیز درخواست، ہر ادوات تجارت، بائس بیسٹہ مفلسی کے دائرہ کرنے اور جبری کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

بمقام: اسلم شاہ
 الرقم: 1119
اسلم شاہ

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

FB

No.

APPEAL No. 69 of 2019.

Islam Shah

Appellant/Petitioner

Versus

Through Secy. Edu. KPk Psh.

RESPONDENT(S)

Notice to Appellant/Petitioner

Islam Shah S/o Mian Gul
PST. Govt. Primary School
Garang Distt. Battagram

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on at

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 A Head

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No..... of 20

69 19

TB

Islam Shah

Appellant/Petitioner

Versus

Through Secy. Edu. Dept.

RESPONDENT(S)

Notice to Appellant/Petitioner

Muhammad Masood-ul-Rehman
Advocate Supreme Court
of Pakistan Abbottabad

Awar

Take notice that your appeal has been fixed for Preliminary hearing; replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 7-7-2019 at 5:00 PM

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 Abbottabad

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

TB

No.

APPEAL No. 69 of 20 19

Islam Shah

Appellant/Petitioner

Versus

Through Secy. Edm: KP/16/P/81

RESPONDENT(S)

Awan

Counsel
Notice to Appellant/Petitioner

Mushtaq Masood-ur-Rehman
Advocate Supreme Court
of Pakistan at Abbottabad

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 11-12-2020 at 1:00 PM

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 Ahmad

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

113

No.

APPEAL No. 69 of 20 19

Islam Shah

Appellant/Petitioner

Versus

Through Secy: Edm: KDC Pesh:

RESPONDENT(S)

Shah

Notice to Appellant/Petitioner

Islam Shah E/o mian Gul
PST, Govt. Primary School
Gorang Distt. Battagram

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 14-12-2020 at 9.10 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 A-Abad

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

"A"

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

No.

APPEAL No. 69 of 20 19

Islam Shah

Appellant/Petitioner

Versus

Through Secy. Edu: 14 Pk Pesh:

RESPONDENT(S)

Notice to Appellant/Petitioner

Islam Shah S/o Mian Gul
P.S. Govt. Primary School
Garang Distt. Battagram

Take notice that your appeal has been fixed for Preliminary hearing, replication, ~~affidavit~~ counter affidavit, ~~rejoinder~~ arguments/order before this Tribunal on at

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 A Head

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

"A"

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

No.

TB

APPEAL No. 69 of 20 19

Islam Shah

Appellant/Petitioner

Versus

Through Secy. Govt. Pesh.
RESPONDENT(S)

Notice to Appellant/Petitioner Dismissed Amir

Malik Masood-ur-Rehman
Advocate, Supreme Court
of Pakistan at Abbottabad

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on..... at.....

14-7-2021 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 A. A. Abd

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

“A”

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

No.

APPEAL No..... 69 of 2019 .

Islamshah S/o Mian Gulshah

Appellant/Petitioner

Versus

Education department

RESPONDENT(S)

Notice to Appellant/Petitioner ~~Mian~~ Islamshah S/o Mian Gulshah
Shah, P.S.T Govt. Primary School Garang
District Battagram.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 30-11-2021 at Abbottabad.

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
Abbottabad

E. Khan
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No. 69 of 20 19.

Islam Shah

Appellant/Petitioner
Counsel

Versus

Education's department

RESPONDENT(S)

Notice to Appellant/Petitioner Malik Masoud-ur-Rehman
awan Advocate Supreme Court of
Pakistan.

Take notice that your appeal has been fixed for Preliminary I, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 30-11-2021 at Abbottabad.

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
Abbottabad.

Ekhay
Registrar,
Khyber Pakhtunkhwa Service Tribunal
Peshawar.