



22<sup>nd</sup> Sept 2022

Learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present.

Learned counsel for the appellant seeks adjournment as he has not prepared the case. Last chance is given to argue the case. To come up for arguments on 17.11.2022 before D.B at camp court Abbottabad.

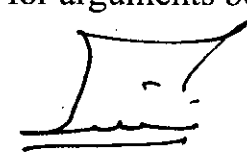
  
(Fareeha Paul)  
Member (Executive)


  
(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

17<sup>th</sup> Nov, 2022

Nemo for the appellant. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Counsel are on strike, therefore, the case is adjourned to 16.12.2022 for arguments before the D.B at Camp Court Abbottabad.

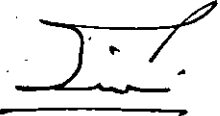
  
(Salah Ud Din)  
Member (Judicial)  
Camp Court Abbottabad

  
(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

22.12.2021

Learned counsel for the appellant present and stated that security and process fee have not been deposited due to having no knowledge of the same and in this respect, he submitted an application for allowing him to deposit the same. The application is placed on file in connected Service Appeal No. 1483/2019, which is accepted and the appellant is directed to deposit security and process fee within seven working days from today. After the requisite deposit, notices be issued to the respondents for submission of written reply/comments on 17.02.2022 before the S.B at Camp Court Abbottabad.

Appellant Deposited  
Security & Process Fee



(Salah-Ud-Din)  
Member (J)

Camp Court Abbottabad

21<sup>st</sup> July 2022

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG and Mr. Noor Zaman Khattak, District Attorney for the respondents present.

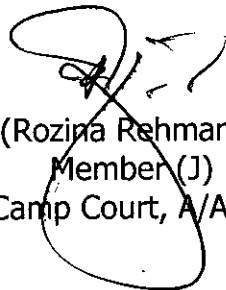
Written reply on behalf of the respondents not submitted. Notices be issued to the respondents for submission of written reply/comments. Last chance is given to the respondents to submit written reply/comments within fifteen days in office, failing which their right for submission of written reply shall be deemed as struck of. To come up for arguments on 22.09.2022 before D.B at camp court Abbottabad.



(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

17.03.2021 Appellant present through counsel. Preliminary arguments heard. File perused.

Points raised need consideration. Appeal is admitted to regular hearing subject to all legal objections. Appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to respondents for reply/comments. To come up for written reply/comments on 13.07.2021 before S.B at Camp Court, Abbottabad.

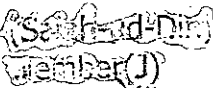
  
(Rozina Rehman)  
Member (J)  
Camp Court, A/Abad

13.07.2021 Due to cancellation of tour, Bench is not available. Therefore, case to come up for the same as before on 13.10.2021.

Reader

13.10.2021 None is present on behalf of the appellant.

Security and process fee have not been deposited, therefore, notices could not be issued to the respondents. Notice be issued to the appellant/counsel to deposit the security and process fee within 07 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on next date positively, otherwise their right for submission of written reply/comments shall be deemed as struck off. Case to come up on 22.12.2021 before the S.B at at camp court, Abbottabad.

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

  
Chairman  
Camp Court, A/Abad

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

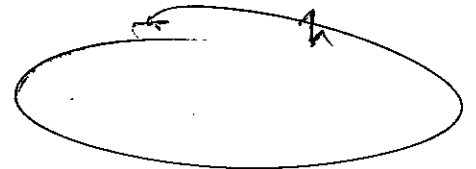
  
Reader

Due to summer vacation case to come up for the same on  
18 19 20 at camp court abbottabad.

  
Reader

18.09.2020

Appellant has not forth come in person however, the clerk of the counsel did appear. According to him Mr. Abdul Saboor Khan learned counsel for the appellant has proceeded to District Kohistan for attending a case in the Model Court situated there, therefore, requested for adjournment. The appeal is adjourned to 14.12.2020 on which to come up for preliminary hearing before S.B at Camp Court, Abbottabad.



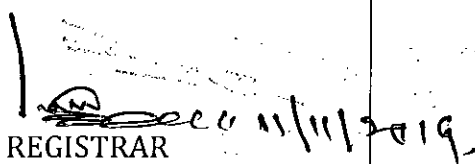

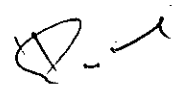
(MUHAMMAD JAMAL KHAN)  
MEMBER  
CAMP COURT ABBOTTABAD

Form- A

### FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 1510/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge		
1	2	3		
1-	11/11/2019	<p>The appeal of Mr. Muhammad Habib received today by post through Mr. Abdul Saboor Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>2-</p>	24.01.2020	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>24-1-20</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Clerk to counsel for the appellant present and seeks adjournment on the ground that learned counsel for the appellant is not in attendance. Adjourn. To come up for preliminary hearing on 20.03.2020 before S.B at Camp Court Abbottabad.</p> <p style="text-align: right;"> Member Camp Court, A/Abad</p>

**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Service appeal No 1510 of 2019

Muhammad Habib.....Appellant

**VERSUS**

Director Elementary and Secondary  
Education Peshawar etc .....Respondents

**APPEAL**

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**Dated 06.11.2019**

*M - Habib*  
**MUHAMMAD HABIB**  
(Appellant)

Through:-

**ABDUL SABOOR KHAN**  
Advocate High Court

1

**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Service appeal No. \_\_\_\_ of 2019

Muhammad Habib, son of Gul Khan,  
Physical Education Teacher (PET) posted at  
Government Middle, School Gheel, Ranolia,  
Tehsil Pattan, District Kohistan Lower.

.....Appellant

**VERSUS**

- 1) Director Elementary and secondary  
Education Peshawar.
- 2) District Education officer (Male) Lower  
Kohistan at Pattan.

.....Respondents

**APPEAL UNDER SECTION 4 OF KPK**  
**SERVICE TRIBUNAL, ACT, 1974**  
**AGAINST THE IMPUGNED ACTION**  
**OF RESPONDENTS WHEREBY**  
**SENIORITY OF THE PETITIONER**  
**HAS BEEN COUNTED WITH EFFECT**  
**FROM 27.06.2014 INSTEAD OF**  
**23.05.2014.**

**PRAYER:-**

On acceptance of the instant service appeal, the impugned action of respondents whereby seniority of the appellant counting from 27.06.2014 instead of 23.05.2014 be set aside and consequently respondent No 02 be directed to count the seniority of the appellant with effect from 23.05.2014 instead of 27.06.2014 after making necessary correction in all relevant records with all admissible benefits and other allowances arising out as a consequence of correction of seniority and any other order as may deem fit and appropriate in the facts and circumstances of the case in hand.

**Respectfully Sheweth:-**

1. That, petitioner appeared in the Screening test conducted by NTS authorities for the post of Physical Education Teacher (PET) in the year 2014 and secured 74.41 score and appellant was placed at serial No 04 of the merit list.



2. That, the appointment order of six (06) teachers were made on 23.05.2014 whereas appellant was marked absent in interview.

**(Copy of appointment order dated 23.05.2014 is annexed as Annexure "A").**

3. That, appellant made an appeal on the ground that he was wrongly marked absent in interview and he had appeared on the date of interview before the selection committee which appeal was accepted vide order 09.06.2014.

**(Copy of order dated 09.06.2014 is annexed as Annexure "B").**

4. That, as a consequence of acceptance of appeal, appellant was appointed on 27.06.2014, in continuation of appointment order No 2299-2305 dated 23.05.2014.

**(Copy of order dated 27.06.2014 is annexed as Annexure "C").**

5. That, the services of the teachers including the appellant was regularized after expiry of probation period on 17.03.2018, wherein the seniority of the appellant was shown w.e.f

27.06.2014 instead of 23.05.2014 in view of the order dated 27.06.2014 issued in continuation of appointment order dated 23.05.2014.

**(copy of notification dated 17.03.2018 is annexed as Annexure "D").**

6. That, felling aggrieved, appellant made an application to respondent No 02 on 13.06.2019, which after process was put at back burner.

**(Copy of application dated 13.06.2019 is annexed as Annexure "E").**

7. That, appellant also approached the respondent no 01/Appellate authority through an appeal dated 10.07.2019, vide registry No 68 dated 10.07.2019 with no response up till now.

**(copies of appeal and registry No 68 dated 10.07.2019 is annexed as Annexure "F").**

8. That, felling aggrieved from the impugned action/inaction of the respondents, appellant having no other except to file the present service appeal before this Honourable Tribunal for interference inter alia, on the following amongst other grounds.

**GROUND:-**

- A) That, admittedly, the appointment order of the appellant dated 23.06.2014 has been issued by competent authority in continuation of appointment order No. 2299-2305 dated 23.05.2014, so respondents are under legal obligation to count the seniority of the appellant with effect from 23.05.2014.
- B) That, there is no cavil to the proposition that act of the Department does not affect and prejudice the employee.
- C) That, appellant never remained absent in the interview and he was wrongly marked so, which was later on corrected by Department itself vide order dated 09.06.2014.
- D) That, the candidates lower in merit than that of the appellant have been given seniority from 23.05.2014, but

appellant has been denied by giving him w.e.f 27.06.2014.

- E) That, due to wrong committed by the department itself, appellant has been suffering loss in the matters of seniority, annual increments and other legally allowed and admissible allowances.

**PRAYER:-**

On acceptance of the instant service appeal, the impugned action of respondents whereby seniority of the appellant counting from 27.06.2014 instead of 23.05.2014 be set aside and consequently respondent No 02 be directed to count the seniority of the appellant with effect from 23.05.2014 instead of 27.06.2014 after making necessary correction in all relevant records with all admissible benefits and other allowances arising out as a consequence of correction of seniority

and any other order as may deem fit  
and appropriate in the facts and  
circumstances of the case in hand.

Dated 06.11.2019

*M. Habib*  
**Muhammad Habib**  
(Appellant)

Through:-

~~ABDUL SABOOR KHAN~~  
~~ADVOCATE HIGH COURT~~

**VERIFICATION :**

I, Muhammad Habib, son of Gul Khan, Physical Education Teacher (PET) posted at Government Middle, School Gheel, Ranolia, Tehsil Pattan, District Kohistan Lower, do hereby solemnly affirm and declare that the contents of fore-going Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed form this Honorable Tribunal.

*M. Habib*  
**Muhammad Habib**

**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Service appeal No \_\_\_\_\_ of 2019

Muhammad Habib ..... **Appellant**

**VERSUS**

Director Elementary and Secondary  
Education Peshawar etc ..... **Respondents**

**APPEAL**  
**AFFIDAVIT**

I, Muhammad Habib, son of Gul Khan, Physical Education Teacher (PET) posted at Government Middle, School Gheel, Ranolia, Tehsil Pattan, District Kohistan Lower, do hereby solemnly affirm and declare on oath that the no such subject matter appeal has ever been filed before this honorable court nor pending nor decided. That the contents of fore-going affidavit are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed from this Honourable tribunal.

**Dated: 06.11.2019**

*M. Habib*  
**MUHAMMAD HABIB**  
**DEPONENT**

**ATTESTED**



**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Service appeal No \_\_\_\_\_ of 2019

Muhammad Habib.....**Appellant**

**VERSUS**

Director Elementary and Secondary  
 Education Peshawar etc .....**Respondents**

**APPEAL**

**CORRECT ADDRESSES OF THE PARTIES**

**APPELLANT:**

Muhammad Habib, son of Gul Khan,  
 Physical Education Teacher (PET) posted at  
 Government Middle; School Gheel, Ranolia,  
 Tehsil Pattan, District Kohistan Lower.

**RESPONDENTS:**

- 1). Director Elementary and secondary  
 Education Peshawar.
- 2). District Education officer (Male) Lower  
 Kohistan at Pattan.

**Dated 06.11.2019**

*M. Habib*  
**Muhammad Habib**  
 (Appellant)

Through:-

**ABDUL SABOOR KHAN**  
**Advocate High Court**



Office of the District Education Officer

(Male) Kohistan

Phone No. 0993-407128

No. 2299-2305/Estab-(M) Secy./KH  
Dated Kohistan the 23/05/2014.

APPOINTMENT

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Physical Education Teacher School based in BPS-15 (Rs. 8500-700-29500) @ Rs. 5500/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge:-

Sr. No	Name	Father Name	Score	Name of School
1	Mosti	Roshan Khan	87.24	GMS Khan Abad
2	Gul Zareen	Abdullah Khan	77.8	GMS Mada Khel
3	Mumtaz Khan	Abdullah Khan	74.51	GMS Kuz Gahcen
4	Ahmed Ali	Sohna	74.31	GMS Dahir
5	Jan Muhammad	Haji Muhammad Saeed	71.45	GMS Gaya Dubair
6	Saleemallah	Jari Muhammad	68.93	GMS Bada Kei

TERMS & CONDITIONS

1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year.
4. He should not be handed over charge if he exceeds 35 years or below 18 years of age. Age relaxation case may be submitted to competent authority.
5. Appointment is subject to the condition that the Certificate/documents must be verified from the concerned authorities, If found producing bogus Certificate/ Documents will be reported to the law enforcing agencies for further action.
6. His services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/ allowances shall be forfeited to the Government.
7. Pay will not be drawn until and unless a certificates/ Documents are verified.
8. He should join his post within 10 days of the issuance of this notification. In case of failure to join the post within 10 days of the issuance of this appointment order, his appointment will expire automatically and no subsequent appeal etc shall be entertained.
9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. He will be governed by such rules and regulations as may be issued from time to time by the Govt.
11. His services shall be terminated at any time, in case his performance is found unsatisfactory during his contract period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
12. His appointment is made on School based, he will have to serve at the place of posting, and His service are not transferable to any other station.
13. Before handing over charge once again their documents may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

District Education Officer  
(Male) Kohistan

Endst: No. \_\_\_\_\_ /DEO (M) KH, Dated: 23/05/2014.

Copy forwarded for information and necessary action to the:-

1. District Accounts Officer Kohistan.
2. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department.
3. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
4. PA to Deputy Commissioner Kohistan.
5. Head Masters/Incharge concerned schools.
6. Teachers concerned.
7. Local Office.

District Education Officer  
(Male) Kohistan

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

Sl. No. 2528 dt. 09-06-2014

*Amir*

*The Director  
 Elementary Education  
 Kohistan District Headquarters  
 Peshawar*

**REMISSION AGAINST THE ADVERTISED VACANT POSTS**  
**SUPPLEMENTARY - DSC FOR III**

Sl. No.	Name of Candidate	Roll No	Name of Post applied for	Mertit Score	Reason for not appointing	Remarks
06	Atiqul Haq	223001	DM	82.55	Dropped due to SDG certificate	Complete
07	Qari	223000	DM	73.85	Dropped due to SDG certificate	07 Vacant
05	Muhammad dJabbir	222001	PEI	74.42	Abund	01 Vacant
04	Muhamma d Hayat Khan	224002	AT	104.1	Dropped due to not producing BA Degree	02 Vacant
03	Jehan Zeb	2240075	AT	116.1	Clerical mistake	01 Vacant

Insipie of the careful work few candidates submitted appeals detail as under

No. of teacher appointed

06  
06  
06  
09  
01  
06  
00

Remarks

Complete  
07 Vacant  
01 Vacant  
02 advertised resignation  
Complete  
01 Vacant  
12 Vacant

It is further requested that 07 PSI Posts are vacant by appointing candidates. Candidates of PSI are available in the amongst the top-10s of concerned Union council. Candidates of PSI are available in the respective U/C below Top-10 and also in nearby U/C.

It is further requested that in the case of Qaris, we have the data of top-10 for the post of each advertised school but the NTS arranged the position of the merit by filling the marks of Deeni Asnads in place of formal educational certificates and degrees. By replacing the Deeni Asnad to formal certificates and degrees the merit position badly disturbed. You are requested to give direction as well as to allow the under signed for supplementions. DSC to review the cases for recruitment against the pending posts.

The under signed will be thank full to you for this act of guidance.

*Handwritten notes:*  
 Problem on priority solve this  
 as desired by  
 District Education Officer  
 Kohistan  
 P to Min  
 P to Min

*Dir. ESSE*



Office of the District Education Officer  
(Male) Kohistan  
Phone No.0998-407128

No. 2787 / Estab-(M) Secy:/KH  
Dated Kohistan the 27/06/2014.

**APPOINTMENT**

In continuation of appointment order No.2299-2305/Estab(M) Secondary/KH dated 23/05/2014 and consequent upon recommendation of the Departmental Selection Committee, the appointment of the following candidates are hereby ordered against the post of Physical Education Teacher School based in BPS-15 (Rs.8500-700-29500) @ Rs. 8500/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge:-

Sr. No	Name	Father Name	Score	Name of School
1	Muhammad Habib	Gul Khan	74.42	GMS Gheel Ranolia

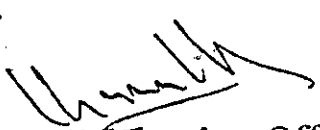
**TERMS & CONDITIONS.**

1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year.
4. He should not be handed over charge if he exceeds 35 years or below 18 years of age. Age relaxation case may be submitted to competent authority.
5. Appointment is subject to the condition that the Certificate/documents must be verified from the concerned authorities, If found producing bogus Certificate/Documents will be reported to the law enforcing agencies for further action.
6. His services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/ allowances shall be forfeited to the Government.
7. Pay will not be drawn until and unless a certificate/ Documents are verified.
8. He should join his post within 10 days of the issuance of this notification. In case of failure to join the post within 10 days of the issuance of this appointment order, his appointment will expire automatically and no subsequent appeal etc shall be entertained.
9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. He will be governed by such rules and regulations as may be issued from time to time by the Govt.
11. His services shall be terminated at any time, in case his performance is found unsatisfactory during his contract period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
12. His appointment is made on School based, he will have to serve at the place of posting, and his service are not transferable to any other station.
13. Before handing over charge once again their documents may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

  
District Education Officer  
(Male) Kohistan

Endst: No. 2784-90 /DEO (M) KH, Dated: 27/06/2014.

- Copy forwarded for information and necessary action to the:-
1. District Accounts Officer Kohistan.
  2. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
  3. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
  4. PA to Deputy Commissioner Kohistan.
  5. Head Masters/Incharge concerned schools.
  6. Teachers concerned.
  7. Local Office.

  
District Education Officer  
(Male) Kohistan

P-14

(14)

(D)

Annex

4

27/11/2019

Attest

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHISTAN.**

Fax & Phone # 0298407128  
E-Mail: emiskohistan@yahoo.com

**NOTIFICATION**

In pursuance of the Khyber Pakhtunkhwa Employees of the Elementary & Secondary Education (Appointment & Regularization of Service) Act, 2017, (Khyber Pakhtunkhwa Act No. 1 of 2018) & Elementary Secondary Education Department Govt. of Khyber Pakhtunkhwa Notification No. SO (S/F) E&SE/D/3/2/2018/SITT/Contract dated 16/2/2018, Service of the following (14) PET male Teachers appointed through NTS on adhoc basis on contract are hereby regularized in BPS-15 on the same post in teaching cadre on terms and condition given blow with effect from the date of their first appointment as per detail given against each, in the interest of public service.

Sr.	Roll No.	Name	Father Name	Address	Total Marks 200	Name of School	Appointment order & dated	Extension No. & dated if any
1	2220007	Mufti	Roshan Khan	Bada Kot Pallan KH: 13402-4539803-3	87.24	GMS Khan Aabad	2299-2305 dt 23.05.14	3939-45 dt 25-05-17
2	2220005	Ahmad Ali	Sohna	Shalkan Abad Pallas Kohistan	83.4	GHS Dubair	2299-2305 dt 23-05-2014	3939-45 dt 25-05-17
3	2220012	Gul Zareen	Abdullah Khan	Kuz Palas Kohistan/13402-9356419-3	77.8	GMS Mada Khel Abad	2299-2305 dt:23.5.14	3939-45 dt 25-05-17
4	2220019	Muhammad Habib	Gul Khan	Shourgara Bankad KH: 13402-0158072-9	77.44	GMS Gheel Ranolia	2784-90 dt:27.06.14	3939-45 dt 25-05-17
5	2220011	Mumtaz	Abdullah Khan	Pallas Kohistan 13402-9363582-3	74.51	GMS Shaikan Abad	2299-2305 dt:23.5.14	3939-45 dt 25-05-17
6	2220028	Jan Muhammad	Muhammad Saeed	Zor Keli Jijal Kohistan 13403-0242044-3	71.45	GMS Gaya Dubair	2299-2305 dt 23.05.14	3939-45 dt 25-05-17
7	2220018	Saleemullah	Jan Muhammad	Sholghara Bankad Kohistan	68.93	GHSS Badakot	2299-2305 dt 23-05-2014	3939-45 dt 25-05-17
8	871500023	Muhammad Qasim	Muhammad Yameen	Seo Gayal 13401-2850581-3	103.91	GMS Barigo Kandia	2295-2302 dt 20.03.15	3939-45 dt 25-05-17
9	111500180	Abdur Rahim	Tehsil Khan	Bar Sherial Palas KH: 13503-3442067-5	89.36	GMS Banil Qalla	2295-23 dt 20.03.015	3939-45 dt 25-05-17
10	761500136	Sharifud Din	Ghazi Khan	Kolai Pallas KH: 13402-4935810-5	96	GMS Kolai	1689-98 dt 09.03.016	3939-45 dt 25-05-17
11	781500095	Sabir Khan	Wahid Zaman	Alla Abad Jijal KH: 13403-4006467-1	89.59	GMS Singa Raja Abad	1689-98 dt 09.03.016	3939-45 dt 25-05-17
12	871500030	Ziaud Din	Umar Khan	Umar Abad Jijal 13403-5921183-1	110.91	GMS Mujhgali	2623-30 dt:31.03.17	
13	8715000019	Fazal Ellahi	Molvi Adam Khan	Coloni Pattan Kohistan 13403-1967915-1	108.08	GMS Shoki Seer	2623-30 dt:31.03.17	
14	6615000232	Sher Afzal	Shams ul Qamar	Gulibagh Pallas KH: 13402-3442285-5	105.79	GMS Shamal Bala	3202-9 dt 21.04.17	

*Arrested*  
*15*  
*Arise*  
Terms and conditions:

1. Their services shall be governed by the Khyber Pakhtunkhwa civil servant act, 1973 The K. Pakhtunkhwa (Appointment, Deputation, Posting and transfer of Teachers, Lecturers, Instructors & Doctors) Regulatory act, 2011, and such rules & Regulations as may be issued from time to time by the Government.
2. Their services shall be considered regular and they shall be eligible for pension/deduction of GP fund and terms of the Khyber Pakhtunkhwa civil servant act 1973 as amended in 2013.
3. They shall possess the same qualification and experience required for a regular post.
4. Their services are liable to termination on one month notice from either side, in case of resignation without notice; their one-month pay/allowances shall be forfeited to the Government.
5. Their regularization shall not affect the promotion quota of existing holders of posts in respective service cadres.
6. The regularization will not be in favor of those, who have not taken over charge or have remained absent from duty or resigned from service and also not for those who are under disciplinary proceedings.
7. The employees whose services are regularized under the Khyber Pakhtunkhwa employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (The Khyber Pakhtunkhwa Act No. 1, 2018) or in the process of attaining service at the commencement of the Khyber Pakhtunkhwa employees of Elementary and Secondary Education (Appointment and Regularization of Services) Act 2017 (The Khyber Pakhtunkhwa Act No. 1, 2018) shall rank junior to all civil servants belonging to the same service or cadre, as the case may be who are in service on regular basis on the commencement of the Khyber Pakhtunkhwa employees of Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2017 (The Khyber Pakhtunkhwa Act No. 1, 2018), and shall also rank junior to such other person, if any, who, where appointed on regular basis to the respective service or cadre before the commencement of this act, irrespective of their actual date of appointment.
8. The seniority inter-se of the employees, whose services are regularized under this act within the same service or cadre, shall be determined on the basis of merit position and such service or cadre.
9. Their seniority shall be determined on the basis on their continuous service in cadre, provided that if the date of continuous service in the case of two or more employees as the same, the employees older in age shall rank senior to younger one.

(RAJ MUHAMMAD KHAN)  
DISTRICT EDUCATION OFFICER,  
(MALE) KOHISTAN.

Endstt.No. 2141-497 the regularization dated 17/03/2018

Copy for information to:

1. The Director E&SE Khyber Pakhtunkhwa Peshawar.
2. The Deputy Commissioner Kohistan Upper.
3. The Deputy Commissioner Kohistan Lower.
4. The Deputy Commissioner Kolai Pallas Kohistan.
5. District Accounts Officer Kohistan.
6. The District Monitoring Officer IMU Kohistan.
7. The Deputy District Education Officer (Male) Kohistan.
8. The Teachers concerned.
9. Office record

*17/03/18*  
DISTRICT EDUCATION OFFICER,  
(MALE) KOHISTAN.

16 خدمات جناب ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) ضلع کوہستان  
ڈی. او. ڈسٹرکٹی ایگڈ پرائمری تفریق آرڈر PET

11/11/2019

Armed (E)

تفاریق یکسانی ہے کہ سائیل بجٹ PET NTS پاس کرنے انٹرویو  
سے شامل ہوا۔ بالی کے سفایق سائیل اسکور 74.41 بنتے تھے۔

آرڈر نمبر 23/S/2014 میں تفریق شامل تھا۔ تاہم دفتر غلطی کی وجہ  
سے میرٹ لسٹ سے سائیل کو غیر جاندار کر دیا گیا۔ بعد میں میں نے  
جناب DEO صاحب کو درخواست دی تو اس نے 9/6/2014 کو ایک لیٹر  
نمبر 2578 جاری کیا۔ جس میں سائیل کی غیر جانداری ختم کرنے قابل سینڈ

وجہ اور اس میں کیا آرڈر 27/6/2014 کیا گیا۔ جس میں مذکورہ  
اولین آرڈر کا حوالہ دیا گیا جو کہ Continuation آرڈر  
Date 23/6/2014 2299-2305 کے حوالہ دے کر سائیل کی تفریق کر دی

جو کہ بحالی 2784-90 نمبر 27/6/2014 جس میں سائیل اسکور  
74.42 اور GMS گھیل رٹولیکہ سائیل کی تفریق کر دی

تاہم چونکہ آرڈر اولین تفریق Continue تفریق کا حوالہ دیا گیا  
جس نے ختم میرٹ سنیاری اولین میرٹ لسٹ کے تحت ہونے کا کیا گیا۔  
جس میں سائیل جو کہ نمبر 27/6/2014 کے تاہم مذکورہ آرڈر سے نظر انداز  
ہونے کی وجہ سے میرٹ سنیاری 27/6/2014 سے شمار ہوتی۔ اور سائیل تفریق  
بجٹ سے ہی شروع ہوا۔

تفاریق سائیل کا ریگڈ درجہ بالا وجوہات کی وجہ سے درست کرنے  
کا حکم صادر فرمائیں۔ تاہم سائیل کیسوں سے اپنا تفریق عمل جاری  
رکھیں۔ تو میں ڈسٹرکٹ آفیسر۔

تفریق PET  
GMS گھیل رٹولیکہ

Date 13-06-2019

Provide photocopied  
of record  
13/6/19

DEO(m) Koh. Upper  
Please provide him  
recording you  
found it  
As this office  
not exist at the  
time of his  
appointment  
13/06/19  
DEO(m) Koh

DEO(m) Koh. Lower  
Plz. Through please  
13/6/19

Attested

P (17)

بخدمت جناب ڈائریکٹر صاحب ایلیمینٹری اینڈ سیکنڈری ایجوکیشن KPK پشاور

08/11/2019

عنوان: درستگی ریکارڈ برائے تقرری آرڈر PET

Arunk (F)

جناب عالی!

گزارش کی جاتی ہے کہ سائیل بحیثیت PET NTS پاس کر کے انٹرویو میں شامل ہوا۔ پالیسی کے مطابق سائیل کا سکور 74.41 بنتے تھے۔ آرڈر مجریہ 23/05/2014 میں تقرری کا اہل تھا۔ تاہم دفتری غلطی کی وجہ سے میرٹ لسٹ میں سائیل کو غیر حاضر مارک کیا۔ بعد میں میں نے جناب DEO صاحب کو درخواست دی تو اس نے 09/06/2014 کو ایک لیٹر نمبر 2578 جاری کیا۔ جس میں سائیل کی غیر حاضری ختم کر کے فائیل میننگ وجہ اور ساتھ میں نیا آرڈر 27/06/2014 کیا گیا۔ جس میں مذکورہ اولین آرڈر کا حوالہ دیا گیا جو کے Continuation آرڈر نمبر 2299-2305 Date: 23/05/2014 کا حوالہ دے کر سائیل کی تقرری کر دی جو کے بمطابق 2784-90 مجریہ 27/06/2014 جس میں سائیل کا سکور 74.42 اور G.M.S گھیل رانولیا سائیل کی تقرری کر دی۔ تاہم چونکہ آرڈر اولین تقرری Continue تقرری کا حوالہ دیا گیا۔ جس کے تحت میری سناریوئی اولین میرٹ لسٹ کے تحت نہیں کیا گیا۔ جس میں سائیل چوتھے نمبر پر آتے تھے۔ تاہم مذکورہ آرڈر سے نظر انداز ہونے کی وجہ سے میری سناریوئی 27/06/2014 سے شمار ہوئی۔ اور سائیل ایک انکریمینٹ سے بھی محروم ہوا۔ لہذا آپ صاحبان کو درخواست ہے کہ DEO اوئیر کوہستان اور DEO اپر کوہستان کے ری مارکس بمعہ ریکارڈ لف ہے۔ آپ صاحبان ضلع کے عہدید ہونے کی وجہ سے اختیارات convert ہوتی ہیں۔ سائیل کی آرڈر کی Continuation مورخہ 23/5/2014 سے کرنے کا حکم جاری کر کے مشکور فرمائیں تو عین نوازش ہوگی۔

العارض!

محمد حبیب PET گورنمنٹ ٹڈل سکول گھیل رانولیا  
وڈوگاؤں شوگر ہیکڈ ڈاکخانہ رانولیا ضلع لوئر کوہستان  
مورخہ: 10-07-2019

P. 18

No.

For Insurance Notices see reverse  
Symptoms of insects except in case of  
uninsured letters of not more than  
the initial weight prescribed in the  
Post Office Guide or on packets  
acknowledgement is due.

Rs. 68 Ps.

Received a registered\*  
addressed to \_\_\_\_\_

Post Office  
Date-Stamp JUL 2013

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 { 10-7-13



# وکالت نامہ

19

بعدالت جناب سروس ٹریبونل KPK پشاور

ڈائریکٹر ایلیمنٹری اینڈ سیکنڈری ایجوکیشن وغیرہ

نام

محمد حبیب

سروس اپیل

اپیلانٹ

باعث تحریر آنکھ!

منجانب:

## عبدالصبور خان ایڈووکیٹ ہائی کورٹ

اندریں مقدمہ عنوان بالا اپنی طرف سے برائے بیرونی وجوہات ہی بمقام پشاور ہائی کورٹ

کو بدیں شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص رزرو عدالت حاضر ہوتا رہوں گا اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہو اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی اور جگہ پکھری کے مقررہ اوقات سے پہلے یا بروز تعطیل بیرونی کرنے کے مجاز نہ ہونگے اگر مقدمہ مقام پکھری کے آگے یا پیچھے سماعت ہونے پر مظہر کو کوئی نقصان پہنچے تو صاحب موصوف ذمہ دار نہ ہوں گے اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی، اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرنے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے کا، ہر قسم کا بیان دینے اور سپرد ثالثی و راضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا فیصلہ ڈگری و اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا سنگی علیحدہ فیس کرنے کا مجاز ہوگا۔ بصورت ضرورت بدوران مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا پیر سٹر کو بجائے خود یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو، پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیرونی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ مجھے کل ساختہ پرداختہ مثل ذات خود منظور و قبول ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے۔ مضمون وکالت نامہ سن لیا اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

مورخہ 06.11.2019

محمد حبیب PET گورنمنٹ مڈل سکول گھیل رانولیا ضلع لوئر کوہستان..... پیشینہ

Attested & Accepted  
Abdul Saboor Khan  
Advocate High Court