

20<sup>th</sup> Sept 2022 . Petitioner in person present. Mr. Kabiruallah  
Khattak, Addl: AG alongwith Mr. Sohail Ahmad Zeb,  
Litigation Officer for respondents present.

Representative of the respondents submitted copy  
of letter dated 08.09.2022 by the DEO(M) Abbottabad  
addressed to the Director Elementary and Secondary  
Education, Peshawar for implementation which is  
placed on file. Learned AAG assured that the  
implementation report will be submitted on the next  
date. To come up for implementation report on  
15.11.2022 before S.B at camp court Abbottabad.

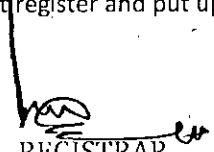
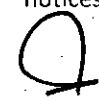
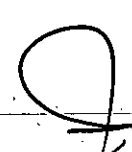


(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

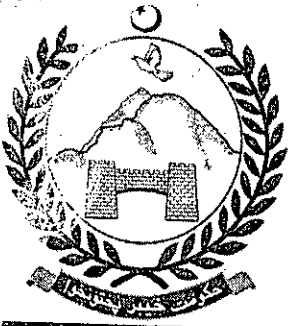
Form- A  
FORM OF ORDER SHEET

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

Execution Petition No. 395/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	07.07.2022	<p>The execution petition of Mr. Naveed Iqbal received today by registered post may be entered in the relevant register and put up to the Court for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	14-7-22	<p>This execution petition be put up before touring Single Bench at A.Abad on <u>19-7-22</u>. Original file be requisitioned. AAG has noted the next date. The respondents be issued notices to submit compliance/implementation report on the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p>
	19 <sup>th</sup> July 2022	<p>None for the petitioner present. Mr. Noor Zaman Khattak, District Attorney alongwith Mr. Sohail Ahmad Zeb, Assistant Litigation for respondents present.</p> <p>Implementation report not submitted. Representative of the respondents seeks time to submit the same on the next date. Respondents are directed to submit proper implementation report on the next date positively. To come up for implementation report on 20.09.2022 before S.B at camp court Abbottabad. Original file be also requisitioned.</p> <p style="text-align: right;"></p>

(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad



No. 6805-7 /Appeal/Promotion/2022

Dated: 8/09/2022

☎ 0992-9310102, 0992-330131

✉ EDO.Education.Atd@gmail.com

The Director,  
Elementary and Secondary Education,  
Khyber Pakhtunkhwa Peshawar.

Subject: **EP NO.395/2022 IN SA NO.7810/2020 TITLED NAVEED IQBAL (SAT BPS-16) VS GOVT OF KPK & OTHERS.**

Memo:

In continuation of this office letter No. 6348 dated 02.09.2022 on the subject cited above and it is submitted that Mr.Naveed Iqbal SAT GHS No.03 Abbottabad was deferred from Promotion AT to SAT ( 11.11.2019) and his name was mentioned at serial # 03 of Working Papers due to incomplete service book. (Copy of Working Paper attached as Annex-A). The said teacher filed Departmental Appeal on 13.03.2020 against Promotion order issued under Notification No.2902-5 dated 25.02.2020.(Copies of Departmental Appeal & Promotion order attached as Annex-B & C respectively).

Mr.Naveed Iqbal was promoted from AT to SAT vide Notification No.7398 dated 11.12.2020. (Copy attached as Annex-D). The said Teacher filed service Appeal No.7810 of 2020 before KP Service Tribunal with the prayer that "Notification 25.02.2020 may be set aside and appellant may be promoted w.e.f 25.02.2020 with all back benefits and Department contested the case and filed parewise comments. Honorable KP Service Tribunal accepted the appeal on 19.05.2022. This office has challenged the Judgment of Honorable Service Tribunal dated 19.05.2022 before the Honorable Supreme Court of Pakistan and filed CPLA No.664-P/2022 which is subjudice. (copy of Judgment attached as Annex-E).

Now the said teacher filed EP No.395/22 in SA 7810/20 before the Honorable KP Service Tribunal in Camp Court Abbottabad in which Honorable Tribunal directed the department to submit the **Implementation Report** on next date of hearing i.e 20.09.2022 (Copy of EP attached).

It is therefore, in order to avoid any adverse/penal order against the Department. You are hereby requested to please implement the Judgment of Honorable Service Tribunal dated 19.05.2022 **Provisionally/Conditionally subject to the final outcome of CPLA # 664-P/2022**

District Education Officer (M)  
Abbottabad

Ends: No and Date Even:  
Copy forwarded to the

1. Deputy Secretary (Legal) E&SED KP Peshawar.
2. Deputy Director (Litigation) E&SE KP Peshawar.

District Education Officer (M)

**BEFOE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR CAMP COURT, ABBOTTABAD**

*Execution Petition No. 395 /2022*

IN

*Service Appeals No-7810/2020*

Naveed Iqbal S/o Ghulam Rabbani SAT Govt Higher Secondary School  
No.3, Abbottabad, Resident of Village Banda Khair Ali Khan, Tehsil &  
District, Abbottabad, Mob# 0312-6995949.

.....PETITIONER

**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, KPK, Peshawar.
2. Director E&S Education, Khyber Pakhtunkhwa, Peshawar.  
District Education Officer (Male) E&SE, Abbottabad.

.....RESPONDENTS

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**EXECUTION PETITION**

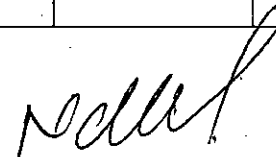
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S.NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE NO
1.	<i>Memo of Execution Petition alongwith certificate</i>		1-3
2.	<i>Copy of Judgment dated 19/05/2022 passed by Hon'ble Tribunal in Service Appeal No.7810/2020.</i>	"A"	4-8
3.	<i>Copy of applications dated 11/06/2022, before respondents No.1&amp;2.</i>	"B"	9-10
4.	<i>Copy of application dated 10/06/2022, before respondent No.3.</i>	"C"	11

Dated: 05/07/2022

  
(NAVEED IQBAL)  
PETITIONER IN PERSON

0312-8995949

**BEFOE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR CAMP COURT, ABBOTTABAD**

Execution Petition No. 385 /2022

IN

Service Appeals No-7810/2020

**Khyber Pakhtunkhwa  
Service Tribunal**

Diary No. 677

Dated 07-07-2022

Naveed Iqbal S/o Ghulam Rabbani SAT Govt Higher Secondary  
School No.3, Abbottabad, Resident of Village Banda Khair Ali  
Khan, Tehsil & District, Abbottabad, Mob# 0312-6995949.

.....PETITIONER

**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, KPK, Peshawar.
2. Director E&S Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male) E&SE, Abbottabad.

.....RESPONDENTS

---

**SUBJECT: EXECUTION PETITION FOR IMPLIMENTATION OF JUDGMENT  
DATED 19/05/2022 PASSED BY KPK SERVICE TRIBUNAL CAMP  
COURT ABBOTTBAD IN SERVICE APPEAL NO.7810/2020  
REGARDING PROMOTION OF THE PETITIONER.**

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**RESPECTFULLY SHEWETH:**

1. That, .petitioner filed a Service appeal No.7810/2020 on 14/07/2020 against the illegal deferment of the petitioner from promotion as AT (BPS-15) to SAT (BPS-16) which was accepted on 19/05/2022 and respondent / department was directed that the promotion of the appellant shall be given effect when his juniors were promoted to the post of Senior

Arabic Teacher and he, be also assigned the due place in seniority list.

**(Copy of Judgment dated 19/05/2022 is attached as Annexure "A")**


2. That, on 09/06/2022, petitioner got the attested copy of above said Judgment and submitted applications for implementation alongwith certified copy of judgment before the respondent No.1 &2 on 11/06/2022 through Registered Post but the same are still pending and respondents / department did not take any favourable action. **(Copies of both the applications dated 11/06/2022 submitted by petitioner are attached as Annexure "B")**
3. That, the petitioner also submitted an application for implementation of above cited judgment before respondent No.3 on 10/06/2022 which was received by Respondent vide diary No.2842 and Respondent No.3 send the Judgment alongwith covering letter to respondent No.2 through diary No.3435 dated 13/06/2022 with the request to file CPLA against the said Judgment dated 19/05/2022 and on 16/06/2022 through Endst: No.945, respondent No.2 send the same to respondent No.1 for further proceeding. **(Copy of application dated 10/06/2022 is attached as Annexure "C")**
4. That, the department / respondents are not willing to implement the said judgment dated 19/05/2022 and are raising the point for not implementing the said judgment that the respondents / department intend to file the CPLA in the August Supreme Court of Pakistan against the said judgment of KPK Service Tribunal, while according to the Judgment of August Supreme Court, *"when the Hire court will not suspend the lower court's judgment then the respondents are bound to implement the judgment of lower court"*.

5. That, respondents are bounds to implement the said Judgment of Hon'ble KPK Service Tribunal with letter and spirit but they are reluctant to do so and are using delaying tactics which act of the respondents is totally illegal, unlawful and unjustified and the Hon'ble Service Tribunal have a power under Section 7 (2) (d) of the Service Tribunal Act 1974 to take legal action against respondents and to enforce the said judgment in the light of the CPC 1908 (execution of its decision)

**It is therefore, humbly prayed** that on acceptance of instant Execution Petition, respondents may kindly be directed to implement the Judgment of this Hon'ble Tribunal dated **19/05/2022** regarding the promotion of petitioner with letter and spirit i.e.

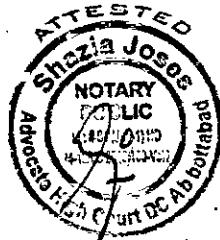
- i) To issue promotion order of the petitioner w.e.f. 25/02/2020
- ii) To issue order of back benefits of the petitioner w.e.f. 25/02/2020 to 08/12/2020.
- iii) Issue order to assign the due place to petitioner in seniority list.

**Dated: 05/07/2022**

  
**Naveed Iqbal**  
**(Petitioner in person)**

**CERTIFICATE:**

It is certify that the contents of instant Execution Petition are true and correct to the best of our knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.



5/7/2022

  
**DEPONENT**

(4)

**ANNEXURE**

**A**

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**CAMP COURT ABBOTTABAD.**

**Service Appeal No. 7810/2020**

**BEFORE:** KALIM ARSHAD KHAN --- CHAIRMAN  
FAREEHA PAUL --- MEMBER(E)



**Naveed Iqbal S/o Ghulam Rabbani, Arabic Teacher, Government High School No.3 (English Medium), Abbottabad, resident of village Banda Khair Ali Khan post Office Dobather, Tehsil and District Abbottabad.**  
.....(Appellant)

**VERSUS**

1. **Government of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education Department Peshawar.**
2. **Director of Elementary & Secondary Education Department, Khyber Pakhtunkhwa Peshawar.**
3. **District Education Officer (M), Elementary & Secondary Education Abbottabad.....(Respondents).**

**Present:**

**NAVEED IQBAL**  
Appellant --- In person.

**SYED NASEER UD DIN,**  
Assistant Advocate General --- For respondents.

Date of Institution.....14.07.2020  
Date of Hearing.....19.05.2022  
Date of Decision.....19.05.2022

**JUDGEMENT.**

**KALIM ARSHAD KHAN, CHAIRMAN:-** According to this service appeal instituted under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 filed against impugned order dated 25.02.2020 issued under endorsement No. 2902-8, respondent No.2 had allegedly illegally deferred the appellant from promotion to the post of Arabic Teacher to Senior Arabic Teacher post, the said order

**ATTESTED:**



was said to be totally against the law, without jurisdiction malafide and issued on baseless facts.

02. It is alleged in the appeal that the appellant was appointed as Arabic Teacher (BS-09) on 05.04.1999, who assumed the charge on 10.04.1999 at Government Middle School Noor Mang, District Abbottabad. That on 18.11.1999, the appellant was promoted from BPS-09 to BPS-14 on the basis of prescribed qualification i.e. "Shahadat-UI-Almai" in the light notification dated 07.08.1991 issued by the provincial government. That later on, the post was upgraded to BPS-14 to BPS-15 and the post of the appellant was also upgraded to BPS-15 on 05.08.2006 in the light of notification dated 23.05.2006 issued by the Finance Department, Khyber Pakhtunkhwa Peshawar. That respondent No.3 prepared seniority list of all cadres including the Arabic Teachers in which the appellant was placed at serial No. 114 of the said seniority list. That the appellant was promoted from BPS-15 to BPs-16 on 01.05.2016 in the light of notification dated 30.06.2015 issued by the Finance Department Peshawar. That respondent No.3 issued a new seniority list on 31.12.2018 in which the appellant was placed at serial No.46. Thereafter on 11.11.2019 a meeting of the Departmental Promotion Committee was held in which the appellant was also included but respondent No.2 issued impugned promotion orders of Arabic Teacher and Senior Arabic Teacher on 25.02.2020 wherein the appellant was deferred and other teachers at serial No. 48,51 and 52 of the seniority list were promoted. Feeling aggrieved the appellant filed departmental appeal on 13.03.2020 to respondent

**ATTESTED**

19/5/22

**ATTESTED**  
 Director, Peshawar  
 Service Tribunal  
 Peshawar

No.1 which was not responded within the statutory period, hence, the instant service appeal on 14.07.2020.

03. Notices were issued to the respondents who submitted written replies/comments and contested the appeal.

04. We have heard learned counsel for the appellant and Assistant Advocate General and perused the case file with connected documents thoroughly.

05. Appellant argued that he had not been treated according to the law and rules. That at the time of scrutiny, prior to promotion, if there was any objection/deficiency regarding the promotion/documents of appellant, they should have informed the appellant in written for removal of objection/deficiency and necessary entries in the service book is not the responsibility of the authority rather it should be done by the authority. He further contended that all the requirement of prescribed qualification for promotion were fulfilled but despite that the appellant was deferred from promotion which was against the norms of justice. Appellant concluded his arguments on the point that the impugned order dated 25.02.2020 was totally illegal, against the law and without lawful authority, hence, liable to be set aside.

06. Learned Assistant Advocate General on the other hand submitted that a meeting of Departmental Promotion Committee was convened on 11.11.019 for the purpose of promotion of Arabic Teacher to the posts of Senior Arabic Teacher and that the name of the

**ATTESTED**

19/5/22

*[Signature]*  
Assistant Advocate General

appellant was also included in the working paper however, he was deferred due to incomplete service book. He further contended that the appeal was not maintainable. He, therefore, requested for dismissal of the instant appeal.

07. It appears from the undisputed record that the appellant was senior to one Qazi Muhammad Naeem as shown in the working paper, prepared for the meeting of the Departmental Promotion Committee to make promotion of four Arabic Teachers from BPS-15 to the post of Senior Arabic Teachers BPS-16 but in the column of eligibility the appellant was deferred and in the column of decision of the committee the reason was shown to be incomplete service book. Deferment from promotion is not a punishment rather a deficiency and on removal of such deficiency the one who is deferred from promotion had to be promoted from the date when his junior was promoted along with restoration of his actual seniority. It is also undisputed that the appellant was not superseded. So in a case of deferment when the reasons for deferment cease to exist the deferred officer is promoted from the date of deferment i.e. the date when his juniors were promoted and this is also provided as such in the promotion policy introduced by the Government of Khyber Pakhtunkhwa in 2009. As regards the reason that the service book of the appellant was incomplete that was a fact which apparently was beyond the control of the appellant as the service book is maintained and completed by the department/superiors and not by the officer himself. Vide notification bearing endorsement No.7389-98/EB-/Promotion/ SCT/ SDM/ SAT/

**ATTESTED**

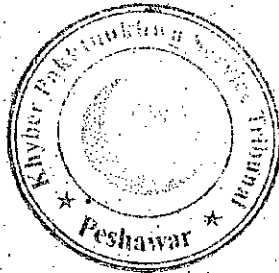
19/5/22

**ATTESTED**  
 E. A. M. J. A. R.  
 Khyber Pakhtunkhwa  
 Service Tribunal  
 Peshawar

STT/ SPET dated 11.12.2020, though the appellant was promoted, but with immediate effect whereas the department ought to have promoted the appellant from the date of deferment i.e. the date on which his juniors were promoted.

08. In the light of foregoing reason, the appeal in hand is accepted and the respondents are directed that the promotion of the appellant shall be given effect when his juniors were promoted to the post of Senior Arabic Teacher. He be also assigned the due place in seniority list. Costs shall follow the event. Consign.

09. Pronounced in open court in Camp Court Abbottabad and given under our hands and seal of the Tribunal this 19<sup>th</sup> day of May, 2022.



*(Signature)*  
(KALIM ARSHAD KAHN)  
CHAIRMAN  
CAMP COURT ABBOTTABAD

*(Signature)*  
(PAREEHA PAUL)  
MEMBER(E)  
CAMP COURT ABBOTTABAD

Certified to be true copy  
*(Signature)*  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Date of Presentation of Application 09/6/22  
Number of Words 2000  
Copying Fee 200  
Urgent 3/1  
Total 200  
Name of Applicant \_\_\_\_\_  
Date of Completion of Copy 09/6/22  
Date of Delivery of Copy 09/6/22

*(Signature)*  
**ATTESTED**

9

**ANNEXURE  
B**

To,  
The Secretary,  
Elementary & Secondary Education, Department,  
Khyber Pakhtunkhwa, Peshawar.

Subject: APPLICATION FOR IMPLEMENTATION OF JUDGMENT DATED 19/05/2022 IN SERVICE APPEAL NO. 7810/2020 PASSED BY KPK SERVICE TRIBUNAL CAMP COURT ABBOTTABAD, TITLED "NAVEED IQBAL VERSUS GOVT OF KPK THROUGH SECRETARY E&S EDUCATION DEPARTMENT PESHAWAR Etc.

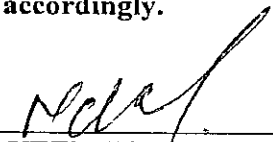
**Respected Sir,**

- ❖ That, the applicant was working as a A.T (Arabic teacher) at GHS No.3, Abbottabad and eligible for promotion from A.T to SAT post (BPS-15 to BPS-16) and illegally differed from promotion by Director E&SE, Peshawar and DEO (M) Abbottabad in DPC meeting held on 11/11/2019 due to incomplete service book and finally impugned order was issued on 25/02/2020 by Director E&SE Peshawar in which the name of applicant was differed but most junior teachers to the applicant were illegally promoted.
- ❖ That, applicant aggrieved by said impugned order and filed departmental appeal before your good office which was not decided during the stipulated period of 90 days at which applicant submitted Service Appeal No.7810/2020 before the KPK Service Tribunal on 11/07/2020.
- ❖ That, meanwhile, your good office conducted an inquiry with regard to illegally deferment of applicant and inquiry committee submitted inquiry report on 08/09/2022 before office of the Director E&SE KPK Peshawar with recommendation that the departmental appeal of the applicant may be accepted.
- ❖ That, on 17/09/2020 vide letter No.1271-72, Director E&SE wrote a letter to DEO(M) Abbottabad for the implementation of inquiry report with letter and spirit and resultantly, Director E&SE issued promotion order of the applicant on 08/12/2020 with immediate effect instead of 25/02/2020.
- ❖ That, on 19/05/2022, KPK Service Tribunal Camp Court Abbottabad, accepted the Service appeal No.7810/2020 of applicant with all back benefits.

**It is therefore, humbly requested that the Judgment dated 19/05/2022 of the KPK Service Tribunal Camp Court Abbottabad may kindly be implemented with letter and spirit and:-**

- i) **Promotion order of the applicant be issued w.e.f. 25/02/2020.**
- ii) **All back benefits of the applicant from 25/02/2020 to 08/12/2020 be released.**
- iii) **Seniority list of the applicant be corrected accordingly.**

**Dated: 11/6/2022**

  
**(NAVEED IQBAL)**  
SAT, GHSS No.3, Abbottabad.  
Contact No. 0312-6995949

  
**ATTESTED**

10

To,

The Director,  
Elementary & Secondary Education, Department,  
Khyber Pakhtunkhwa, Peshawar.

Subject: APPLICATION FOR IMPLEMENTATION OF JUDGMENT DATED 19/05/2022 IN SERVICE APPEAL NO. 7810/2020 PASSED BY KPK SERVICE TRIBUNAL CAMP COURT ABBOTTABAD. TITLED "NAVEED IQBAL VERSUS GOVT OF KPK THROUGH SECRETARY E&S EDUCATION DEPARTMENT PESHAWAR Etc.

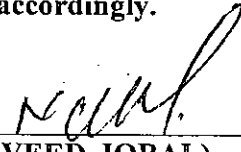
Respected Sir,

- ❖ That, the applicant was working as a A.T (Arabic teacher) at GHS No.3, Abbottabad and eligible for promotion from A.T to SAT post (BPS-15 to BPS-16) and illegally differed from promotion by Director E&SE, Peshawar and DEO (M) Abbottabad in DPC meeting held on 11/11/2019 due to incomplete service book and finally impugned order was issued on 25/02/2020 by Director E&SE Peshawar in which the name of applicant was differed but most junior teachers to the applicant were illegally promoted.
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- iii) Seniority list of the applicant be corrected accordingly.

Dated: 11/6/2022

  
(NAVEED IQBAL)  
SAT, GHSS No.3, Abbottabad.  
Contact No. 0312-6995949

  
ATTESTED

11

ANNEXURE  
C

To,  
The District Education Officer (Male),  
Elementary & Secondary Education, Department,  
Abbottabad.

Subject: APPLICATION FOR IMPLEMENTATION OF JUDGMENT DATED 19/05/2022 IN SERVICE APPEAL NO. 7810/2020 PASSED BY KPK SERVICE TRIBUNAL CAMP COURT ABBOTTABAD, TITLED "NAVEED IQBAL VERSUS GOVT OF KPK THROUGH SECRETARY E&S EDUCATION DEPARTMENT PESHAWAR Etc.

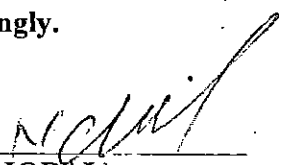
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- ii) All back benefits of the applicant from 25/02/2020 to 08/12/2020 be released.
- iii) Seniority list of the applicant be corrected accordingly.

Dated: 10/06/2022

  
(NAVEED IQBAL)  
SAT, GHSS No.3, Abbottabad.  
Contact No. 0312-6995949

  
ATTESTED