

27.09.2022

Junior to counsel for appellant present.

Muhammad Riaz Khan Paindakheil learned Assistant Advocate General alongwith Bahraman ADEO and Muhammad Tufail Assistant for respondents present.

File to come up alongwith connected Service Appeal No.1615/2019 titled "Hussain Rehman Vs. Education Department" on 01.12.2022 before D.B.



(Fareeha Paul)
Member (E)



(Rozina Rehman)
Member (J)

01.12.2022

Junior to counsel for the appellant present.
Muhammad Adeel Butt learned Additional Advocate General alongwith Behrmand Khan Deputy Director for respondents present.

File to come up alongwith connected Service Appeal No.1615/19 titled "Hussain Rehman Vs Education Department" on 17.02.2023 before D.B.



(Fareeha Paul)
Member (E)



(Rozina Rehman)
Member (J)

SCANNED
KUST
Peshawar

14.04.2022

Appellant alongwith his counsel present. Mr. Naseer-Ud-Din Shah, Assistant Advocate General for the respondents present.

On 20.12.2021, my learned predecessor, while recording order sheet, observed that the respondents were afforded last opportunity for submission of written reply/comments, but they did not submit the same even till 20.12.2021. Another last opportunity was given to them to submit written reply/comments subject to cost of Rs.2000/- but again there is no written reply/comments filed by them. Vide even order it was also held that the right of reply/comments of the respondents shall be deemed as struck off in view of the above order. To come up for arguments before the D.B on 19.05.2022.

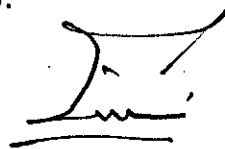


Chairman

19.05.2022

Clerk of learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Learned Member (Judicial) Ms. Rozina Rehman is on leave, therefore, arguments could not be heard. Adjourned. To come up for arguments on 21.07.2022 before the D.B.



(Salah-ud-Din)
Member (Judicial)

21.07.2022


Junior to counsel for appellant present.

Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General for respondents present.

File to come up alongwith connected Service Appeal No.1615/2019 titled "Hussain Rehman Vs. Government of Khyber Pakhtunkhwa" on 27.09.2022 before D.B.



(Fareeha Paul)
Member(E)



(Rozina Rehman)
Member (J)

20.12.2021

Counsel for the appellant and Mr. Muhammad Muhammad Adeel Butt, Addl. AG for the respondents present.

The respondents were afforded with last opportunity for submission of written reply/comments but even today they have not submitted reply/comments and seek adjournment through learned AAG. Let the respondents be afforded with another last chance subject to cost of Rs. 2000/- on or before next date with the warning that in case they fail to submit the written reply/comments and cost, their right for reply/comments shall be deemed as struck off by virtue of this order. Case to come up for arguments on 22.02.2022 before the D.B.


Chairman

22.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 14.04.2022 for the same as before.


Reader

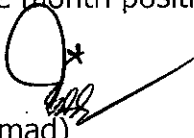
30-12-2020

Due to summer vacation, case is adjourned to
17-3-2021 for the same as before.


Reader

17.03.2021 Counsel for the appellant and Addl. AG for the respondents present.

On 13.08.2020, the proceedings were adjourned for arguments, however, on subsequent two occasions, the matter was adjourned on the strength of Reader's Note. Learned AAG requests for time to furnish the reply/comments due to the said reason. Adjourned to 19.05.2021. On the next date arguments on the appeal shall be addressed while the respondents shall furnish the reply within one month positively.


(Mian Muhammad)
Member (E)


Chairman

19-5-21


*Due to COVID 19, the case is adjourned
to 10-9-21, for the same.*

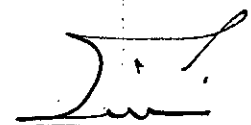

Reader

10.09.2021

Clerk of counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Clerk of counsel for the appellant stated that learned counsel for the appellant is unable to attend the Tribunal today due to strike of Lawyers. Adjourned To come up for arguments before the D.B. on 20.12.2021.


(ATIQU-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

28.10.2020

Proper D.B is on Tour, therefore, the case is
adjourned for the same on 30.12.2020 before D.B.


Reader

13.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 07.07.2020 for the same. To come up for the same as before S.B.


Reader

07.07.2020

Counsel for the appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate General for the respondents present and seeks time to submit comments. Last chance is given for submission of reply as well as for reply to application for suspension of notification, on 13.08.2020 before S.B


Member (J)

13.08.2020

Counsel for the appellant present. Nemo for the respondents.

Despite last opportunity, the respondents have not furnished the requisite reply/comments. The matter is, therefore, posted to D.B for arguments on 28.10.2020.


Chairman

03.01.2020

Appellant present in person.

On the strength of admitting note dated 04.12.2019 handed down in Service Appeal No. 1058/2019, instant appeal is admitted to regular hearing subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 27.01.2020 before S.B.

AD 13/1/20
Appellant Deposited
Security & Process Fee


Chairman

27.01.2020

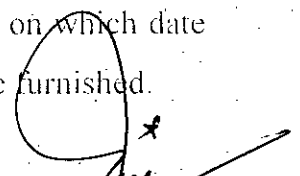
Clerk to counsel for the appellant present. Written reply not submitted. Irfan Assistant representative of the respondent department present and seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 04.03.2020 before S.B.


Member

04.03.2020

Junior to counsel for the appellant and Addl. AG for the respondents present

Learned AAG seeks time to contact the respondents and submit written reply. Adjourned to 13.04.2020 on which date the requisite reply/comments shall positively be furnished.




Member

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1622/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	03/12/2019	<p>The appeal of Mr. Ali Akbar resubmitted today by Mr. Saadatullah Khan Tangi 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 3/12/19</p>
2-	04/12/19.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>03/01/20.</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Muhammad Asim son of Bakht Rawan SST GHS Lajibook District Lower Dir received today i.e. on 29-07-2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Affidavit may be got attested by the Oath Commissioner.
- 3- Annexures of the appeal may be attested.
- ④ Copy of departmental appeal in respect of appellant is not attached with the appeal which may be placed on it.
- ⑤ Copy of Writ Petition in respect of appellant is not attached with the appeal which may be placed on it.
- 6- Necessary party may be made in the heading of the appeal.

No. 1336 /S.T,

Dt. 31-7- /2019.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Saadatullah Khan Tangi Adv. Pesh.

Objection no.4 and 5 are still stand therefore, the appeal in hand is returned again to the counsel for the appellant for completion and resubmission within 15 days. 12/8/19

No. 1492 /S.T,

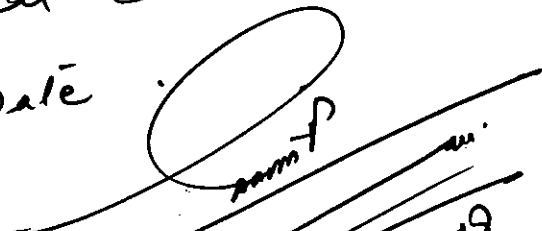
Dt. 23/8 /2019.


REGISTRAR

Mr.Saadatullah Khan Adv. Pesh.

Sir! Name of appellant is mentioned in departmental appeal at page 23. Moreover case of appellant being identical, Judgement - in W.P. referred is applicable to the case of appellant. Re-Submitted.

30.9.019 may kindly be fixed in the case as identical cases are also fixed for the above date.

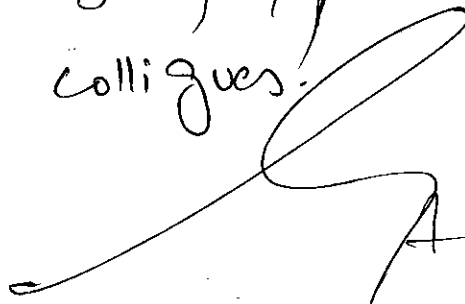

" "
" "
30.8.019.

Sir, D.A is available at page 23. Re-Submitted Completions

the same kindly be clubbed with

Case title "Ghulam Abbas vs Govt" is

fixed for 30.9.19. W.P. was filed by Petitioner's colleagues.



19.9.19

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. 1629 /2019

Muhammad Asim **Appellant**

Versus

Govt. of KP through Secretary Elementary & Secondary
Education, Peshawar..... **Respondent**

I N D E X

S#	Description of Documents	Annex	Pages
1.	Service Appeal		1-5
2.	Affidavit		6
3.	Addresses of parties		7
4.	Copy of Appointment Letter	A	8-13
5.	Copy of Notification dt.24.07.2014	B	14-19
6.	Copy of minutes of the meeting	C	20-22
7.	Copies of departmental Appeal and Writ Petition	D & E	23-28
8.	Wakalatnama		29

Appellant

Through


Saadat Ullah Khan Tangi

Advocate High Court
Cell No.0331-5030566

Dated 18.07.2019

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____/2019

Muhammad Asim S/o Bakht Rawan,
Appointed as SST, GHS Lajibook

District Lower Dir.....**Appellant**

Versus

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar
2. Govt. of Khyber Pakhtunkhwa through Chief Secretary Civil Secretariat, KPK Peshawar
3. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

.....**Respondents**

Service Appeal U/S 4 of the Service Tribunal Act, 1974 against the non consideration of the appellant for promotion to the post of SS(IT) in line with the Notification No.SO (PE)4-5/ SSRC/meeting/ 2012/teaching Cadre dated 24.07.2014 published in official gazette and the same notification be also inserted in service rules 2019 and the appellant be considered for promotion to the post of SS(IT) on the basis of having master degree in Computer Science and having at least five year service as S.S.T (General/Science)

Respectfully Sheweth:

The appellant humbly submits as under:

1. That the appellant having qualification of B.ED, Master in computer Science was appointed as S.S.T, BPS-16 vide order dated 30.11.2015. (Copy of appointment letter is Annexure "A").
2. That since his appointment till date the appellant is performing his duty to the best of his ability and has not given any chance to displeasure of his superiors.
3. That previously in the rules pertaining to the year 2014 the category of appellant i.e. Master in Computer Science was made eligible for promotion to the post of S.S BPS-17. (Copy of Notification dated 24.07.2014 is annexure "B").
4. That later on meeting of respondent was held on 10.08.2017 in which SSTs (General /Science) having M.Sc (Computer Science)/BS (Computer Science)/MIT may be given 50% quota for promotion to the post of SS(IT) B-17. (Copy of minutes of the meeting is annexure "C").

5. That the respondent in utter violation of the notification, and minutes of the meeting as aforesaid is making promotions from SSTs (General/Science) but to utter violation are not considering the appellant for the promotion to the post of S.S(IT).
6. That the respondent is bent upon not to insert the above mentioned notification in the Rules and thereby depriving the appellant from the promotion to the post of SS(IT).
7. That the appellant after exhausting departmental remedies knocked at the doors of august High Court for the redressal of his grievance but the Hon'ble High Court dismissed the Writ Petition for being non maintainable and directed the appellant to approach competent forum for redressal of his grievances. (Copies of departmental Appeal and W.P is Annexure "D." & "E" respectively).
8. That the appellant prefer the instant Appeal on the following grounds inter alia

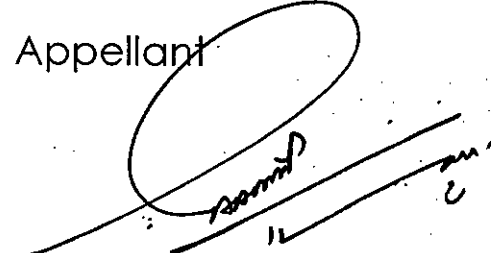
GROUND S:

- A. That the non-considering of the appellant for promotion to the post of SS(IT) despite having requisite qualification of M.Sc Computer Science is in clear violation of Notification dated 24.07.2014 and minutes of the meeting dated 10.08.2017.
- B. That the non-insertion of the category of M.Sc Computer Science for the purpose of promotion to the post of SS(IT) is also violative of notification and minutes of the meeting mentioned above.
- C. That the appellant is quite eligible for promotion to the post of SS(IT) according to aforesaid minutes and Notification but the respondents is bent upon to deprive the appellant from his legal rights of promotion to the post of SS(IT).
- D. That the respondent is under legal obligation to act in accordance with law.
- E. That career progress is the right of every individual under the constitution of Pakistan.
- F. That the appellant reserves the right to agitate other additional grounds at the time of hearing.

It is, therefore prayed that on acceptance of the instant appeal non-considering of appellant for to the post of SS(IT) BPS-17 may kindly be declared as illegal, without lawful authority and notification mentioned above dated 24.07.2014 be also inserted in service rules 2019 and the appellant be considered for promotion to the post of SS(IT) BPS-17 on the basis of his Master Degree in Computer Science.

Through

Appellant



Saadat Ullah Khan Tangi
Advocate High Court

Dated 18.07.2019

CERTIFICATE

No such like appeal has earlier been preferred before this Hon'ble Tribunal.

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____/2019

Muhammad Asim **Appellant**

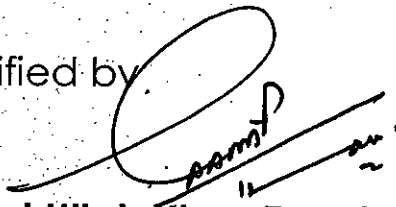
Versus

Govt. of KP through Secretary Elementary & Secondary
 Education, Peshawar..... **Respondent**

AFFIDAVIT

I, Muhammad Asim S/o Bakht Rawan, Appointed as SST, GHS Lajibook District Lower Dir, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Identified by



Saadat Ullah Khan Tangi
 Advocate High Court

CNIC#:

DEPONENT

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____/2019

Muhammad Asim **Appellant**

Versus

Govt. of KP through Secretary Elementary & Secondary
Education, Peshawar..... **Respondent**

ADDRESSES OF PARTIES

APPELLANT:

Muhammad Asim S/o Bakht Rawan,
Appointed as SST, GHS Lajibook
District Lower Dir

RESPONDENTS:

1. Govt. of Khyber Pakhtunkhwa through Secretary
Elementary & Secondary Education, Peshawar
2. Govt. of Khyber Pakhtunkhwa through Chief
Secretary Civil Secretariat, KPK Peshawar
3. Director Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Appellant

Through


Saadat Ullah Khan Tangi
Advocate High Court

Dated 18.07.2019

Appointment Order

Dir Lower Male Appointment Order SST Adhoc 1

Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936
E-mail rafia_kk851@yahoo.com



(B) "B" "A"
Muhammad Asif
SST (Maths) 2018
Sheet 2

APPOINTMENT.

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Secondary School Teacher (SST Bio Chem), (SST Maths Phy), (SST General) School based in BPS-16 (Rs. 12910-1035-43960) @ Rs. 12910/- 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 condition given below with effect from the date of their taking over charge :-

(SST Bio Chem)

Sr	RollNo	Name	Address	Academic Marks [out of 100]	NTS Marks [out of 100]	Total Marks [out of 200]	School
1	7710120	Muhammad Irshad	Village And Post Office Nasafa Talsh Tehsil Timergara CNIC No15302-2229732-3	69.47	61	130.47	GHS Laram
2	7910065	Tjaz Ullah	Iqbal Book Seller Near Hira School And College Timergara Lower Dir CNIC No15306-6366608-1	65.07	63	128.07	GHS Pingal
3	6010441	Hamid Ullah	Endocrinology Lab Animal Sciences Department Quaid E Azam University Islamabad CNIC No15302-9139527-1	63.03	67	127.89	GHS Utala
4	7710245	Muthamunad Tahir	Post Office Timergara Forat Electric Works Shop No 4 Super. Jinnah Market Near Hbl CNIC No15306-1088662-3	61.49	66	127.49	GHS Drangal
5	7710138	Bahrawar Saïd	Village Core Bandagai Post Office Zamindara Tehsil Lal Qilla CNIC No 15305-7930612-1	66.27	61	127.27	GHS Barjam Mekhai
6	7710168	Naveed Ahmad Khan	Vill Shahzadi P/O Koto Teh Balambat Dist Lower Dir CNIC No 15306-9428607-9	62.35	63	125.35	GHS Mina Battan
7	4510312	Haider Ali Khan	C/O Sudais Mobile Zone And Easy Paisa Shop West Ouch Post Office Ouch West Tehsil Aden Zai District Lower Dir CNIC No 15307-7029806-5	64.64	60	124.64	GHS Siawarghar

(SST Maths Phy)

Sr	RollNo	Name	Address	Academic Marks [out of 100]	NTS Marks [out of 100]	Total Marks [out of 200]	School
1	1520036	Asmat Ullah	Village Post Office Bagh Dushkhel Tehsil Timergara CNIC No15302-8717550-9	65.67	66	131.67	GHS Safarai
2	7720016	Muhammad Masim	Village And Post Office Saldo Tehsil Timergara Lower Dir CNIC No15302-4359201-7	68.01	62	130.01	GHS Laj Book
3	7720133	Arshad Iqbal	Village And Post Office Hayasari Tehsil Balambat Dir Lower CNIC No15302-5192825-1	60.67	67	127.67	GHS Sangolai

Dir Lower Male Appointment Order SST Adhoc. 3

			CNIC No15306-3041084-3				
9	7620227	Gul Hamid Khan	Department Of Economics Hazara University Of Manselra CNIC No15304-4463191-1	55-71	79	134-71	GMS Baba Gam

TERMS & CONDITIONS

1. NO TA/DA etc 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 wef 1st December, 2015 to 30th Nov, 2016.
4. She should not be handed over charge if she 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 by the DEO (concerned), any one found producing bogus Certificate will be reported to the law enforcing agencies for further action.
6. His/her 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 to the effect by DEO (concerned) is issued that his/her certificates are verified.
8. He/She 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 notification, his/her 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/she will be governed by such rules and regulations as may be issued from time to time by the Govt.
11. His/her services shall be terminated at any time, in case his performance is found unsatisfactory during his/her contract period. In case of misconduct, he/she shall be proceeded under the rules framed from time to time.
12. His/her appointment is made on School based, He/she will have to serve at the place of posting, and His/her service is not transferable to any other station.
13. Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(Muhammad Rafiq Khattak)

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Indst: No. / File No.2/A-14/SST/Adhoc/Apptt: Dated Peshawar the 30/11/2015.

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. District Education Officers Concerned
4. District Accounts Officer Concerned
5. Official Concerned.
6. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
7. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
8. M/File

Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Serial No. 009876

20
NWFP Agricultural University
Peshawar - Pakistan



Having fulfilled all the requirements for the Degree of

BACHELOR OF SCIENCE

In the subject of

COMPUTER SCIENCE

Muhammad Aasim S/O Bakht Rawan

is this Twenty Second day of February 20 11 admitted to the above Degree

Issue Date 11-03-2011

Registered No. 2007-Agr-U-15704

Controller of Examinations

Registrar

Vice Chancellor



NWFP AGRICULTURAL UNIVERSITY PESHAWAR (PAKISTAN)
OFFICIAL TRANSCRIPT OF RECORD

11

Name and Parentage: Muhammad Aasim S/O Bakht Rawan

Class No. 12

Univ. Reg. No. 2007-Agr-U-15704

Session: 2007-2010

Bachelor of Science in Computer Science

Course No.	Course Title	Credit Hours	Marks Obtained	Grade
First Semester				
BCS-301	Introduction to Computing	3	58	C+
BCS-302	Programming Fundamentals	4	77	B+
EG-301	English Comprehension & Composition	3	80	A
MT-301	Calculus & Analytical Geometry	3	98	A+
MG-301	Financial Accounting	3	85	A
PK-301	Pakistan Studies	1.5	93	A+
IS-301	Islamic Studies	1.5	80	A
			GPA	3.49
Second Semester				
CS-311	Object Oriented Paradigm	3	91	A+
CS-312	Discrete Structure	3	84	A
CS-313	Digital Logic and Computer Architecture	3	80	A
EG-311	Technical and Business Writing	3	68	B
MT-311	Differential Equations	3	96	A+
SS-311	Economics	3	94	A+
			GPA	3.72
Third Semester				
CS-401	Data Structure & Algorithms	3	86	A
CS-402	Database Systems	3	90	A+
CS-403	Operating Systems	3	70	B+
EG-401	Communication Skills	3	85	A
MT-401	Multivariable Calculus	3	85	A
PH-401	Physics (Electromagnetism)	3	73	B+
			GPA	3.61
Fourth Semester				
CS-411	Computer Architecture	3	74	B+
CS-412	Introduction to Software Development	3	85	A
CS-413	Modern Programming Languages-I	3	65	B
MG-411	Financial Management	3	90	A+
MT-411	Linear Algebra	3	96	A+
PH-411	Physics-II	3	81	A
			GPA	3.61
Fifth Semester				
CS-501	Computer Organization & Assembly Language	3	81	A
CS-502	Software Engineering-II	3	84	A
CS-503	Theory of Automata & Formal Languages	3	93	A+
CS-504	Modern Programming Languages-II	3	94	A+
CS-505	Web Engineering	3	82	A
MT-501	Probability and Statistics	3	86	A
			GPA	3.78
Sixth Semester				
CS-511	Computer Communications & Networks	3	93	A+
CS-512	Analysis of Algorithms	3	91	A+
CS-513	System Programming	3	88	A
CS-514	Computer Graphics	3	86	A
CS-515	Visual Programming-I	3	76	B+
PS-511	Psychology	3	90	A+
			GPA	3.78
Seventh Semester				
CS-601	Artificial Intelligence	3	90	A+
CS-602	Compiler Construction	3	93	A+
CS-603	Visual Programming-II	3	85	A
CS-604	Distribution Database Systems	3	80	A
CS-605	Data & Network Security	3	82	A
CS-606	Numerical Computing	3	86	A
			GPA	3.78
Eighth Semester				
SS-611	Professional Practices	3	90	A+
CS-611	Senior Design Project	6	94	A+
			GPA	4.00
			CGPA	3.70
			Marks % age	84.62

The examination was taken as a whole/parts

ERRORS AND OMISSIONS ACCEPTED

Prepared by: [Signature]
Checked by: [Signature]
Date: 18-03-2011

[Signature]
Controller of Examinations

Grading Procedure: The equivalence of marks % age, letter grade & grade point is as under.

Marks % age	Letter grade	Grade Point
90-100	A+	4.00
80-89	A	3.67
70-79	B+	3.33
65-69	B	3.00
58-64	C+	2.50
50-55	C	2.00
Below 50	E	0.00

Control of Examinations
NWFP Agricultural University
136 Peshawar (Punjab)
Total Marks: 4500
Obt. Marks: 3808

12

Serial No. 140964

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
TRANSCRIPT



DMC No. 164701

Roll No. BI606039

Name MUHAMMAD AASIM

Registration No. 14NDR00486

Father's Name BAKHT RAWAN

Enrollment Semester SPR-2016

Address VPO SADDO

Final Semester SPR-2017

Tehsil TIMARGARA

District DIR (LOWER)

has successfully completed MASTER OF EDUCATION (M.ED)
TEACHER EDUCATION

The detail of passed courses is as under

Semester	Course Code	Title of Courses	Marks	
			Maximum	Obtained
SPR- 16	0831	FOUNDATIONS OF EDUCATION	100	71
SPR- 16	0837	EDUCATIONAL RESEARCH	100	69
SPR- 16	0838	CURRICULUM DEVELOPMENT & INSTRUCTIONS	100	72
SPR- 16	0840	EDUCATIONAL PSYCHOLOGY	100	54
AUT- 16	0826	ELEMENTARY EDUCATION	100	60
AUT- 16	0827	SECONDARY EDUCATION	100	67
AUT- 16	0828	HIGHER EDUCATION	100	69
AUT- 16	0829	TEACHER EDUCATION IN PAKISTAN	100	70
SPR- 17	6505	ISLAMIC SYSTEM OF EDUCATION	100	72
SPR- 17	6507	EDUCATIONAL MEASUREMENT & EVALUATION	100	70
SPR- 17	6552	TEXTBOOK DEVELOPMENT-I	100	66
SPR- 17	6553	TEXTBOOK DEVELOPMENT-II	100	56

Credit Hours 36

Total Marks/Obtained 1200 / 796

Result Declared on MARCH 29, 2018

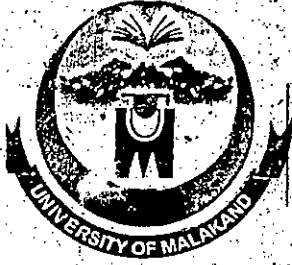
Percentage/Grade 66 / B

Date of Issue APRIL 10, 2018

Mansoor
Controller of Examinations

Disclaimer:

This result card/transcript is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself 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 original record of the university student.



University of Malakand Pakistan

13

DETAILED MARKS CERTIFICATE

Serial No. 009741

Name: MUHAMMAD AASIM
Father's Name: BAKHT RAWAN
Registration No. 20111240008
College/District: Khyber College of Education Timergara Dir (L)
Address: Vill.P.O Sado Timergara.Dir Lower

Roll No. 3706

B.Ed. ANNUAL EXAMINATION 2012

Subject Name	Total Marks	Marks Obtained	Remarks
PERSPECTIVES OF EDUCATION & CONTEMPORARY SOCIAL ISSUES	100	65	PASSED
SCHOOL ORGANIZATION & CLASSROOM MANAGEMENT	50	31	PASSED
EDUCATIONAL PSYCHOLOGY, GUIDANCE & COUNSELLING	100	47	PASSED
EVALUATION TECHNIQUES	50	35	PASSED
CURRICULUM & INSTRUCTION	100	78	PASSED
ISLAMIYAT AND ISLAMIC ETHICS/ ISLAMIC HISTORY	50	32	PASSED
FUNCTIONAL ENGLISH	50	22	PASSED
TEACHING OF MATHEMATICS	100	80	PASSED
COMPUTER EDUCATION	100	87	PASSED
TEACHING SKILL DEVELOPMENT (TEACHING PRACTICE)	200	130	PASSED
TEACHING OF PHYSICAL SCIENCES	100	59	PASSED
Subject Passing Percentage: 40 (Theory & Practical Separately), Aggregate Percentage: 45		1000	666

Examination held from Sep 04 To Sep 19, 2012

Result declared on 31-Dec-2012



Errors and Omissions are subject to subsequent rectification.

Examination was taken as a whole

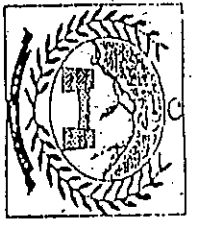
Date of Issue: 31-Dec-2012

Prepared by: Raham Badshah

Controller of Examinations
University of Malakand

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th July, 2014.



NOTIFICATION

No. SO(PE)4-5/SSRC/Meeting/2013/Teaching Cadre:- In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notifications No. SO(G)SS&LD/1-28/2003/Vol-D dated, 09-04-2007, Notification No. SO(G)SS&L/1-69/96/Vol-1/DPE/LIB dated, 13-11-2007, and Notification No. SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre, dated, 13.11.2012, the following further amendments shall be made, namely:

AMENDMENTS.

In the Appendix:-

(i) Serial No. 1 shall be renumbered as 1B and before Serial No. 1B, as so renumbered, the following new entries shall be inserted in respective columns, namely:

1	2	3	4	5
1. Subject Specialist (BPS-17)		i. At least second class Master's Degree or four years BS Degree in the relevant subject; and ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or MA Education or equivalent qualification from a recognized University.	23 to 35 years	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-16), with at least five years service as such and having qualification mentioned in column No. 3. Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

(1)

14

13

B

51

IA Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	22-35 years	<p>recruitment, and</p> <p>(b) fifty percent by initial recruitment.</p> <p>(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No. 3:</p> <p>Provided that if no suitable person is available from amongst Senior Physical Education Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Physical Education Teacher with at least five years service as such as having qualification mentioned in column No. 3;</p> <p>Note:- If no suitable candidate is available in the relevant cadres of the above teachers, the post falling in their promotion queue shall be filled by initial recruitment; and</p> <p>(b) fifty percent by initial recruitment"; and</p>
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(ii) against Serial No. 1B, as so renumbered, for the existing entries, the following shall be substituted, in respective column namely:

16

1	2	3	4	5
1B.	Secondary School Teacher (BPS-16)	<p>I. At least second class Bachelor Degrees from a recognized University on need basis from the following groups with two subject (a) (Chemistry, Botany or Zoology), Or (b) (Physics, Maths "A" or "B" or Statistics) Or (c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p>and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or MA Education or equivalent qualifications from a recognized University.</p>	21 to 35 years.	<p>1. Seventy Five per cent by promotion, on a basis of seniority-cum-fitness, from the district concerned in the following manner</p> <p>(a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years service as Senior Certified Teacher and Certified Teacher or having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from among Senior Certified Teachers for promotion then the post shall be filled by promotion on the basis of seniority-cum-fitness from amongst Certified Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(b) four per cent from amongst the Senior Drawing Masters (BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3.</p>

(3)

				<p>(c) four per cent from amongst the Senior Arabic Teachers (BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, and having qualification mentioned in column No. 3;</p> <p>Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(d) four per cent from amongst the Senior Theology Teachers (BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No. 3;</p>
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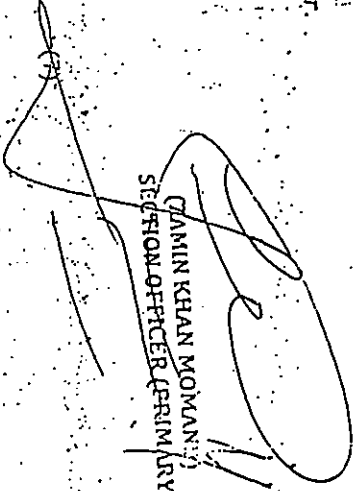
(4)

(5)			<p>Provided that if no suitable candidate is available from amongst Senior Theology Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No. 3;</p> <p>Provided that if no suitable candidate is available from amongst the Senior Qaris then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Qaris with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3:</p> <p>Provided that if no suitable candidate is available from amongst</p>

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst : of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PIIE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officer (M&E) in Khyber Pakhtunkhwa.
14. All District Account Officer in Khyber Pakhtunkhwa.
15. All Agency Education Officer in FATA.
16. All Agency Account Officer in FATA.
17. PS to Governor Khyber Pakhtunkhwa. Peshawar.
18. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
19. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
20. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
21. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.
22. Master file


JAMIL KHAN MOMANJI
SECTION OFFICER (PRIMARY)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Subject: MINUTES OF THE MEETING OF THE SSRC REGARDING ALLOTMENT OF 50% QUOTA TO SST (GEN/SC) FOR PROMOTION TO THE POST OF SS-IT

Meeting of the SSRC regarding the subject matter was held under the Chairmanship of Secretary Elementary & Secondary Education Department on 10/08/2017 at 11:00 am in the committee room of this Department. The following Officers/Officials of the concerned Department/attached Department attended the meeting.

The following attended the meeting:-

1. Dr. Shahzad Khan Bangash, Secretary E&SE Department (In Chair)
2. Mr. Qaisar Alam, Special Secretary (Est.) E&SE Department.
3. Mr. Muhammad Rafiq Khattak, Director E&SE, Peshawar.
4. Mr. Muhammad Shoaib, Deputy Secretary (A), E&SE Department
5. Mr. Javed Siddique, Deputy Secretary (R) Finance Department.
6. Mr. Naik Muhammad, Section Officer (Primary) E&SE Department.
7. Mr. Mohsin Mushtaq, Assistant (R-I) E&AD Department.

2. The forum was informed that E&SE Department vide Notification No. SOG/E&SED/1-86/SS.IT/2016 of E&SE Department Peshawar dated 15.08.2016 has notified the nomenclature of Information Technology Teaching Cadre/Posts serving in the Government High & Higher Secondary Schools of Khyber Pakhtunkhwa of E&SE Department, as Subject Specialist-IT (SS-IT/Computer Science) BPS-17 (Annex-A). Further E&SE Department vide Notification No. SO (PE)4-5/SSRC/Meeting/ 2013/ Teaching Cadre: dated 24/07/2014 has approved promotion to SS posts (BPS-17) from SST (BPS-16). The SST regular having 50% quota of the total sanctioned SS posts allotted for promotion (Annex-B). 50% quota has already been allotted for SSTs (General/Science) in 12 different subjects for Subject Specialist Post. But unfortunately, SSTs (General/Science) who have M.Sc (Computer Science)/BS (CS)/MIT qualification and are eligible for promotion to the post of SS (IT) B-17 have no quota for promotion.

3. In light of the above facts, this Department, therefore, proposed that all those SSTs (General/Science) who have M.Sc. (Computer Science)/BS (Computer Science)/MIT may be given 50% quota for promotion to the post of SS (IT) B-17 like other SSTs, so as to bring uniformity in the teaching cadre.

4. In the above context, the service rules/structure of SST (General/Science) & SST (IT) were approved as tabulated below: -

Sl. No.	Nomenclature of the post	Minimum Qualification for appointment by initial recruitment or by transfer.	Age Limit	Method of recruitment
1.	Subject Specialist-Information Technology (SS-IT) (B-17) Government Higher Secondary Schools/ Govt. comprehensive High Schools and other equivalent posts in the Teaching Cadre.	i.) Master Degree in Computer Science/IT at least in 2 nd Division or equivalent qualification from any recognized University. ii.) Bachelor Degree of Education (B.Ed) at least in 2 nd Division from any recognized University	21-35	a). Fifty percent by promotion on the basis of seniority-cum-fitness from amongst the Secondary School Teacher-IT with at least five years' service AND Secondary School Teacher (SST) (General/Science) possessing master degree in IT or equivalent qualification with 05 years' experience b). Fifty percent by initial recruitment. Note: If no suitable candidate is available for promotion in the relevant cadre than by initial recruitment. Their seniority may be clubbed with SS and amendment may be made in the existing service rules.
2.	Secondary School Teacher Information Technology (SST-IT) (B-16) Govt. High / Higher Secondary Schools	i). Bachelor Degree with the subject of Computer Science at least in 2 nd Division or equivalent Qualification from any recognized institution. ii). Bachelor Degree of Education (B. Ed) at least in 2 nd Division from any recognized institution.	21-35	a). Fifty percent by promotion on the basis of seniority-cum-fitness from amongst the Computer Lab In-charge with (05) years' service having the qualification prescribed for the post of IT Teacher. b). Fifty percent by initial recruitment. Note: If no suitable candidate is available for promotion in the relevant cadre than by initial recruitment.
3.	Junior Teacher- Information Technology (JT-IT) (B-12) Govt. High/Higher Secondary Schools	Intermediate or equivalent qualification from any recognized institution with one-year Diploma in IT/Computer Science from any recognized institution and Certified Teacher Certificate/Diploma or equivalent qualification from any recognized institution.	18-35	By initial recruitment.

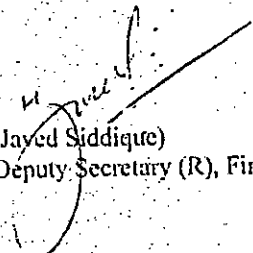
The committee members discussed the proposed amendments in the service rules/structure for the SST (General/Science) & SST (IT) in depth and were agreed upon unanimously.


Decisions:

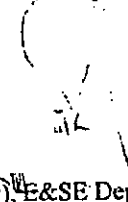
The following decisions were made in consensus: -


- i. The proposed amendments in the service rules/structure as depicted in the above table was approved.
- ii. Nomenclature of the post of CT(IT) was changed as Junior Teacher Information Technology (JT-IT)
- iii. Seniority of SST (General/Science) & SST (IT) will be clubbed together immediately for the purpose of promotion in light of the above amended service rules for the post of SST (General/Science) & SST (IT) to the post of SS(IT/Computer Science)


The meeting ended with vote of thanks to/from the Chair.

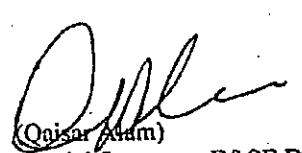

(Jayed Siddique)
Deputy Secretary (R), Finance Department

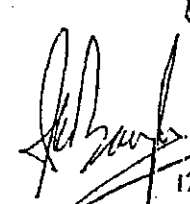

(Mohsin Mushtaq)
Assistant (R-I), E&AD Deptt:


Naik Muhammad
Section Officer (Primary), E&SE Department


Muhammad Shoaib
Deputy Secretary (A), E&SE Deptt:


(Mohammad Rafique Khattak)
Director, E & SE, Peshawar


(Onisar Adam)
Special Secretary, E&SE Deptt:


Dr. Shahzad Khan Bangash
Secretary E&SE Department
(Chairman)

To,

The Most Respected
Secretary E & SE Department
Khyber Pakhtunkhwa Peshawar.

Through: The Director
E & SE Department
K.P.K.

Subject: Appeal For S,ST (Gen/Sc) Promotion to
SS(IT) according to the SSRC meetings
on 10/08/2017 & on 02/01/2018 Regarding
allotment of 50% & 20% Quota to SST (Gen/Sc)
For Promotion to the Post of SS(IT)

Respect Sir,

that we i.e (Atiqur Rahman, Muhib Ullah, Barkat Ullah,
Ali Akbar, Ghazan Ullah, Aftab Ullah, Gungun Khan, Gohar Zaman, Muhammad Aslam
Khan Ullah, H. Shad Ali Khan, Muzaffar Said, Niaz Ahmad, Mujahid Farooq, Saadiq,
Hussain Rehman, Fazli Gani & Rafiq Ahmad Khan)

Serving against S,ST (Gen/Sc) Posts in the E & SE Deptt.

With most veneration it is to bring in your kind notice that
50% quota has already been allotted for SSTs (Gen/Sc) in the
different subjects for Subject Specialist Post but unfortunately,
SST (Gen/Sc) who have M.S (Computer Science) / B.S (CS) / M.IT
qualifications & are eligible for promotion to the Post of SS(IT)

B.S-17 have no quota for promotion.

But in the SSRC meeting on 10/08/2017, E & SE Deptt
Proposed that all those SST (Gen/Sc) who have M.Sc
(Computer Science) / B.S (CS) / M.IT may be given 50%

Quota for promotion to the Post of SS (IT) BPS-17 like other SSTs, so as to bring uniformity in teaching Cadre.

in the SSRC meeting on 02/01/2018 E & SE Deptt. may be given 20% quota for Promotion.

Now according to the SSRC meeting on 10/08/2017 & on 02/01/2018 the quota should be properly notified.

Thanks

Dated: 13/09/2018

① Atiqul Rahman عزت الرحمن

② Mubib Ullah محب اللہ

etc.

D.S (Admin) Amir
 (Recd) 13/9/18
 Dated 13/9/2018

24

E

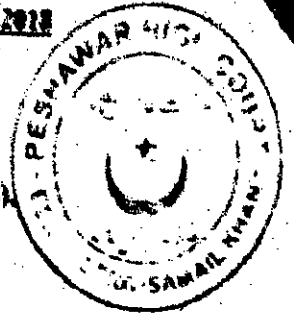
**JUDGMENT SHEET
IN THE PESHAWAR HIGH COURT, D.I. KHAN BENCH**
Educational Department

Writ Petition No. 577-D with C.M.Nos. 1099-D & 1101-D of 2018

Abdul Ahad and 9 others

Versus

Govt. of Khyber Pakhtunkhwa through Secretary (E&S),
Peshawar and seven others



JUDGMENT

Date of hearing

30.01.2019

For petitioners:

Muhammad Anwar Awan Advocate

For respondents:

Mr. Kamran Hayat Miankhel, Addl:
A.G and Mr. Zia ur Rehman Qazi
Advocate

S.MATTIQUE SHAH, J.- Through the instant petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, the petitioners Abdul Ahad and others have prayed that:-

"In wake of above submission it is respectfully prayed that on acceptance of this writ petition may kindly direct the respondent to collect the documents from SST (General/Science) for promotion as Subject Specialist (IT) and consider them according to rules. It is also further prayed that may kindly direct the respondents to amend or interpret the promotion rules by providing ample opportunity to SST (General/Science) as Subject Specialist (IT) BS-17."

ATTESIT
22-2-2019
EXAMINOR
Peshawar High Court
D.I. Khan Bench

2. The petitioners are serving as Secondary School Teacher (General/Science) and seek issuance of writ

directing the respondents to collect documents from SST (General/Science) for promotion as Subject Specialist (IT) and to consider them according to rules and further directions to respondents to amend or interpret the promotion rules by providing ample opportunity to SST (General/Science) as Subject Specialist. Admittedly, the petitioners are civil servants and the matter in question relates to the terms and conditions of their service and in such like cases this Court has no jurisdiction to issue directions for the promotion of petitioners or direction for amendment in the Rules in question. In this respect, reliance is placed on the cases of Province of Punjab, Communication and Works Department, Lahore. Vs. Liaquat Ali Bukhari (1998 PLC(CS) 901), Muhammad Zafar Ali. Vs. Federation of Pakistan through Secretary Establishment, Islamabad (2018 PLC(CS) 116) and Hafiz Muhammad Ilyas. Vs. Government of Khyber Pakhtunkhwa (2018 PLC(CS) N 40). The Honourable Supreme Court of Pakistan in the case of Government of Khyber Pakhtunkhwa. Vs. Hayat Hussain (2016 SCMR 1021) held that:-

"No vested right of a government employee was involved in the matter of promotion or the rules determining their eligibility or fitness. High Court had no jurisdiction by means of constitution petition to strike down such rules."

ANISYEL
 22-02
 EXAMINOR
 Jhelum High Court
 O.I. Khan Bt

Thus, in view of above facts, it has conclusively been resolved that High Court has no jurisdiction to entertain matters relating to civil services involving terms and conditions of their service, or any ground whatsoever.

3. Accordingly for the reasons stated above, this petition is not maintainable and is dismissed alongwith enlisted C.Ms and interim relief. However, the petitioners are at liberty to approach the competent forums for the redressal of their grievance, if so advised.

Announced
Dt. 30.01.2019
Hhsh

JUDGE

JUDGE

(Dy)
Hon'ble Mr. Justice S.M. Anwar Shah
Hon'ble Mr. Justice Shaukat Ali

off
11/2

G.R. No. 557
Application Received on 12-02-19
Copies 5
No of Pages 05 Page
Copied by all
Urgent Fee 200/-
Total Fee 200/-
Copy ready for delivery 12-02-19
Copy del. recd. on 12-02-19
Signature of Ex. Commr
[Signature]
12-02-19

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EX-11111111
Peshawar High Court Bench D.I. Khan
Additional Judge
Chamber - D.I. Khan

BEFORE PESHAWAR HIGH COURT BENCH AT D.I.KHAN

Writ No. 817 of 2018.



1. Abdul Ahad S/O Ghulam Muhammad S/O Ahmad

D.I.Khan currently working at GC/HS no. D.I.Khan as SST (Physics & Mathematics).

2. Kalim Ullah S/O Rehmat Ullah Cas + Baluch R/O Mohallah Ahmad Salh Eld

Gah D.I.Khan currently working as ASDEO SST (General) eludwon circle District D.I.Khan.

3. Dr. M. Naseem Ullah S/O Fateh Ullah R/O Gillani Town near Wensum College

D.I.Khan Currently posted at GHS Haji Mora as SST (General), (Phd).

4. Ghulam Abbas S/O Ghulam Qasim R/O Village Mialy Tehsil Parova D.I.Khan

currently posted at GHS Mangal SST (General).

5. Abdul Ghafoor S/O Ghulam Nabi Khan R/O Village Lunda Para Tehsil Parova

D.I.Khan currently posted at GHS Wanda Sheru D.I.Khan SST (General).

6. Muhammad Imran S/O Haji Ismail R/O Parova D.I.Khan currently posted at

GMS Malaikhi SST (General).

7. Muhammad Bilal S/O Malik Muhammad Amir R/O Currently posted at GHS

SST (General) Gara Rahid D.I.Khan.

8. Rafi Ullah S/O Hameed Ullah R/O Kot Nawaz District Tank, currently working

as ASDEO Education Office Tank SST (General).

9. Asmat Ullah S/O Rahmat Ullah R/O Shadi Khel Village Daraki District Tank

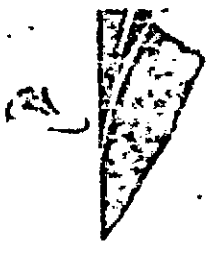
SST (General).

10. Muhammad Farooq S/O Rahim Baluch R/O Village Chah Khan Wala Tehsil

Parova D.I.Khan currently posted at GHS Parova as SST (Physics & Mathematics).

VERSUS

EXAMINER
Peshawar High Court
D.I.Khan Bench



- 1. Director General (DG) Education, Government of Punjab
- 2. Director General (DG) Education, Government of Sindh
- 3. Director General (DG) Education, Government of Balochistan
- 4. Director General (DG) Education, Government of Ferozpur
- 5. Director General (DG) Education, Government of Islamabad Capital Territory
- 6. Director General (DG) Education, Government of Gilgit-Baltistan
- 7. Director General (DG) Education, Government of Azad Jammu & Kashmir
- 8. Director General (DG) Education, Government of Northern Areas

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

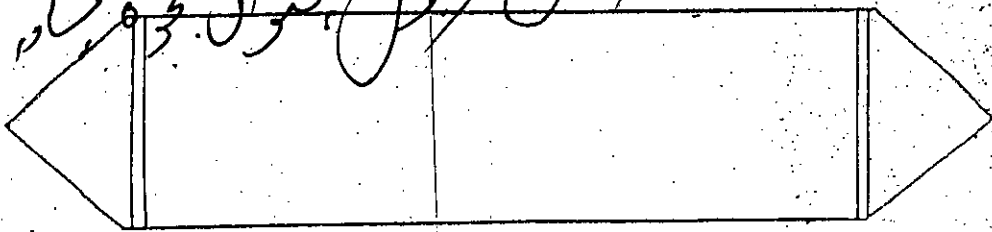
Petitioner

The facts leading me to present this petition are as follows:

1. The petitioner is the daughter of a teacher employed as a secondary school teacher (General Duty) in the Government of Punjab and is a resident of Lahore.
2. The petitioner was employed as a teacher in the Government of Punjab in 1973. She was employed in the Government of Punjab in 1973. She was employed in the Government of Punjab in 1973.
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8. The petitioner was employed in the Government of Punjab in 1973. She was employed in the Government of Punjab in 1973. She was employed in the Government of Punjab in 1973.

Director General (DG) Education, Government of Punjab
 Lahore

بعدالت سروس ٹریبونل پختوان پنجاہ شاہ



محمد عاصم
بنام حکومت
پنجاب اہل فن

سروس اہل

موزجہ
مقدمہ
دعویٰ
جہم

باعث تحریر آئیکہ

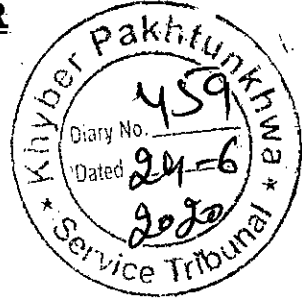
مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام سروس ٹریبونل کیلئے سماوات البرخان تنگھی صاحبی گورنر
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب منسوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقریر ثالثہ فیصلہ برخلاف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانشانہ التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ سندر ہے۔

المقوم 26
ماہ جولائی 2014

کے لئے منظور ہے۔
Accepted
12/11/14
Accepted

سروس ٹریبونل
بمقام

BEFORE THE LEARNED SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR



C.M No. _____/2020

In

Service Appeal No. ~~1018~~/2019

Muhammad Asim.....Petitioner

Vs

Govt of KPK & Others.....Respondents

Subject:- **APPLICATION FOR EARLY HEARING IN THE**
CAPTIONED CASE ALONG WITH CONNECTED
PETITIONS.

Respectfully Sheweth:-

The petitioner humbly submits as under:-

- 1- That the captioned connected Service Appeals is pending adjudication before this August Tribunal for 07.07.2020.
- 2- That the respondents issued notification dated 08.06.2020, and it is very necessary to restrain them from acting upon the same, that's why the petitioners preferred stay applications in the same.
- 3- That the date given is too late and the petitioner request this Hon'ble Tribunal that as such the noted date may please be expedited and be fixed at earliest.

It is therefore, respectfully prayed that on acceptance of this application the above titled case may kindly be fixed at earliest to meet the ends of justice.

*Shall remain posted
to the date already fixed*

Through

*Asim
26/6*

Petitioners

Saadat Ullah Khan Tangi

Advocate High Court

Peshawar

Cell#0331-5030566

Dated:-23.06.2020

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



C.M No. _____/2020

In

Service Appeal No. _____/_____

Muhammad AsimPetitioner

Vs

Govt of KPK & Others.....Respondents

Subject:- **APPLICATION FOR SUSPENSION OF NOTIFICATION
NO.332-52 SS (IT) PROMOTION DATED PESHAWAR
THE 08/06/2020, TILL THE FINAL DISPOSAL OF THE
SERVICE APPEAL.**

*Recd of B
Re Court
18/6/2020*

Respectfully Sheweth:-

The petitioner humbly submits as under:-

Recd

- 1- That the captioned Service Appeal is pending adjudication before this August Tribunal for 07.07.2020.
- 2- That the Directorate of E&SE KPK issued notification No.332-52 SS (IT) Promotion dated Peshawar the 08.06.2020 inviting application/documents for Promotion of SST (IT) BS-16 to SS (IT) BS-17 Regular. (**Attested Copy of Notification is attached as Annexure "A"**).
- 3- That vide the said notification, the respondents intends to deprive the petitioner from his valuable rights of promotion, that's why the petitioner seeks indulgence of this Hon'ble Court for restraining the respondents from acting upon the same till the final disposal of the Service Appeal on the following grounds inter alia.

GROUNDS:-

A- That the impugned notification is against the law on the point and violative of fundamental rights of the petitioner as well as against promotion Rules 2014 & Minutes of SSRC dated 10.08.2017.

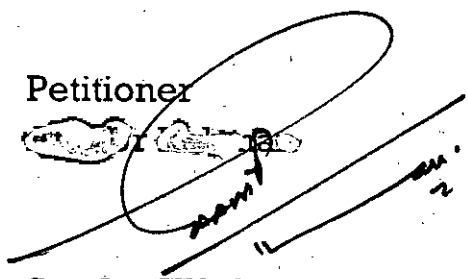
2

B- That the petitioner has good prima facie case, Balance of Convenience lies in favour of petitioner & if impugned notification is not suspended the petitioner would face irreparable loss as the petitioner is discriminated in the matter.

It is, therefore, prayed that on acceptance of the instant application, notification impugned above may kindly be suspended till final disposal of the main service appeal.

Through

Petitioner


Saadat Ullah Khan Tangi
Advocate High Court
Peshawar
Cell#0331-5030566

Dated:-15.06.2020

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BEFORE THE LEARNED SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

C.M No. ____/2020

In

Service Appeal No. ____/____

Muhammad AsimPetitioner

Vs

Govt of KPK & Others.....Respondents

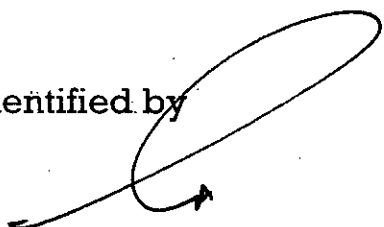
AFFIDAVIT

I, Muhammad Asim S/O Bakht Rawan (Petitioner), do hereby solemnly affirm and declare on oath that the contents of this **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


DEPONENT



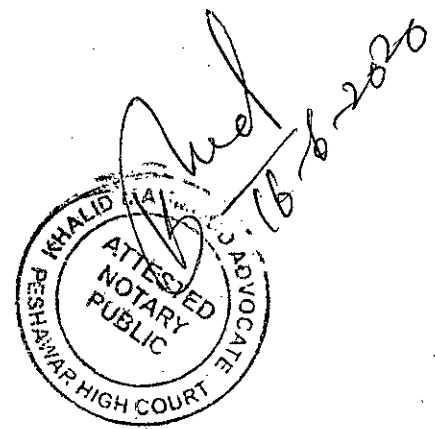
Identified by



Saadat Ullah Khan Tangi

Advocate High Court

Peshawar





Directorate of Elementary & Secondary Education Khyber
Pakhtunkhwa

No. 379-12 SS (IT) Promotions

Dated Peshawar the: 8/16/2020

To

1. All the District Education Officers (Male) Khyber Pakhtunkhwa
2. All the District Education Officers (Male) Newly Merged District in Khyber Pakhtunkhwa

Subject: **SUBMISSION OF APPLICATION/DOCUMENTS FOR PROMOTION OF
SST (IT) BS-16 TO THE POST OF SS (IT) BS-17 REGULAR**

Memo:

I am directed to refer to the subject cited above and to state that the Elementary & Secondary Education (E&SE) Khyber Pakhtunkhwa intends the promotions of SSTs(IT) (Male) BS-16 to the post of Subject Specialist (SS-IT) BS-17 (Regular), hence you are directed to inform the SSTs (IT) concerned having regular appointments up to 2014 against SST (IT) post in your respective districts to provide the applications alongwith relevant documents as per detail given below for the purpose of promotions to SS (IT) post on the following format.

S#	Sen#	Name	Qual:	Div in master	Prof: Qual:	DOB	Domicile	DO 1 st apptt	DO of apptt as regular	Contact#	Remarks if any

Note: - the relevant documents will be consisting of:

1. Bio Data/CNIC
2. 1st App: order/Contract Order
3. Regular App: as SST IT BS-16
4. Service Certificate
5. Non involvement certificate (duly countersigned by DEO)
6. Last 5 Years results
7. Pay slip
8. synopsis
9. ACRs (from 1st app: till 2019) Synopsis / ACRs should be submitted in separate file and documents in separate file, ACR and synopsis should be handed over with the conveying letter from concerned D.E.O to ACR brach.
10. All certificate/degrees with DMCs (duly attested)
11. Domicile
12. Information as per format referred to the above may be provided in hard.
13. Applications/Documents/ information should be reached to this directorate within (10) days after the issuance of his letter.
14. Candidates having 3rd division in Mater are not eligible.

DEPUTY DIRECTOR (ESTAB)

Directorate of Elementary & Secondary
Education Khyber Pakhtunkhwa

8/16/2020

Endst.No. _____ Dated _____/2020

Copy of the above is forwarded to the: -

1. PA to Secretary to Govt: E& SE Deptt Khyber Pakhtunkhwa
2. PA to Director E&SE Khyber Pakhtunkhwa Peshawar

DEPUTY DIRECTOR (ESTAB)

Directorate of Elementary & Secondary
Education Khyber Pakhtunkhwa