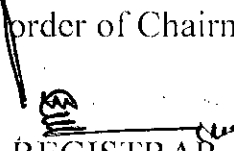


# FORM OF ORDER SHEET

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

Case No.- 1815/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/12/2022	<p>The appeal of Mr. HukmanWali presented today by Mr. Mir Zaman Safi Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____.</p> <p>Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

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

APPEAL NO. 185/2022

HUKMAN WALI

VS

EDUCATION DEPTT:

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APPELLANT

THROUGH:

MIR ZAMAN SAFI  
ADVOCATE

Office: Room No. 6-E, 5<sup>th</sup> Floor,  
Rahim Medical Centre, Hashtnagri,  
Peshawar.

Cell: 0333-9991564

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

APPEAL NO. 1815 /2022

Mr. Hukman Wali, PST (BPS-12),  
GPS Nazir Walai, Lakki Marwat.....**APPELLANT**

**VERSUS**

- 1- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The District Education Officer, District Lakki Marwat.
- 3- The District Health Officer, District Lakki Marwat.

.....**RESPONDENTS**

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL ACT, 1974 FOR ADJUSTMENT AGAINST**  
**THE POST OF PST (BPS-12) AND FOR RELEASE OF SALARIES**  
**W.E. FROM THE DATE OF 1<sup>ST</sup> APPOINTMENT i.e. 15.01.2019 TILL**  
**DATE AND AGAINST NO ACTION TAKEN ON THE**  
**DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE**  
**STATUTORY PERIOD OF NINETY DAYS**

**PRAYER:**

That on acceptance of this appeal the respondent Department may very kindly be directed to adjust the appellant against the post of PST (BPS-12) and release the monthly salaries of the appellant w.e.f the date of 1<sup>st</sup> appointment i.e. 15.01.2019 till date with all other back benefits. Any other relief which this august Tribunal deems fit that may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

*Brief facts of fact of the present appeal are as under:-*

1. That the appellant was appointed as Primary Shool Teacher (BPS-12) vide order dated 15-01-2019 and after appointment the appellant took over the charge of the said post at GPS.Nazar Wali District Lakki Marwat and started performing his duty quite efficiently and upto the entire satisfaction of his superiors. Copies of the appointment order, medical certificate and charge report are attached as annexure.....**A, B & C.**
2. That unfortunately during service the appellant got an accident while riding Motor Cycle and got severe injuries due to which the appellant remained under treatment at the hospital. That due to such injuries the appellant was

unable to perform his duty. Copies of the medical prescriptions are attached as annexure.....D.

3. That after recovery from the said injuries the appellant re-join his duty with full of his devotion and honesty and with all zeal and zest.
4. That it is pertinent to mention here that family of the appellant was involved in serious enmity and the enemies of the appellant were residing in the nearby area of the duty station of appellant. That due to such reason the appellant moved an application before the respondent No.2 alongwith documentary proofs (FIR's) before the competent authority for his transfer from GPS Nazar Wali, Lakki Marwat to GPS Syed Azam Baragi.
5. That the respondent No.4 despite knowing the fact refused the said application for transfer of the appellant but the appellant remained in duty at the concerned station despite of having the life threats. ~~That it is~~ it is also pertinent to mention here that the appellant was regularly performing his duty at the concerned station but the salary of the appellant had not been released by the authorities. **Copies of the duty certificates are attached as annexure.....E.**
6. That the appellant time and again requested the authorities through written and verbal requests to release the monthly salaries of the appellant from the date of 1<sup>st</sup> appointment i.e. 15.01.2019 but in vain. That appellant feeling aggrieved from the inaction of the authorities by not releasing the monthly salaries filed writ petition No. 921-B/2020 before the Peshawar High Court, Bannu Bench but the same was disposed of with the directions to approach the proper forum i.e. Service Tribunal vide judgment dated 12.10.2020. **Copies of the applications, attendance register and judgment are attached as annexure.....F, G & H.**
7. That then after the appellant once again approached the departmental authority and made a request for release of his salary but the authorities had not been given any response on the same and finally due to the ill response of the authorities the appellant remain absent for sometime from his duty. That later on the appellant made several requests for his adjustment against the post of PST (BPS-12) and release of his salaries from the date of 1<sup>st</sup> appointment i.e. 15.01.2019 till date but the authorities are not willing to do so.
8. That the appellant feeling aggrieved from the inaction of the respondents by not allowing him for joining of his duty and as such not releasing the monthly salaries of the appellant from the date of 1<sup>st</sup> appointment i.e. 15.01.2019 preferred departmental appeal before the respondent No.1 but no reply has been received so far. Copy of the departmental appeal is attached as annexure.....I.

9. That the appellant feeling aggrieved and having no other remedy but to file the instant service appeal on the following grounds amongst the others.

**GROUND:**

- A- That the inaction of the authority concerned by not allowing the appellant for rejoining of his duty and as such not releasing monthly salaries of the appellant is against the law, facts, norms of natural justice and materials on the record, hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the authority concerned in accordance with law and rules on the subject noted above and as such the respondents violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
- C- That the authority concerned acted in arbitrary and malafide manner by not releasing the monthly salaries of the appellant w.e.f. the date of 1<sup>st</sup> appointment till date and as such not allowing the appellant to re-join his duty.
- D- That the authority concerned violated the principle of natural justice by withholding salaries of the appellant without any lawful justification.
- E- That not releasing monthly salary of the appellant is violative of Article-11 of the Constitution of Islamic Republic of Pakistan, 1973.
- F- That no adverse order has been passed by the respondents against the appellant, therefore under the law the appellant is fully entitled to be adjusted against the post of PST (BPS-12).
- G- That till date the respondents kept the appellant in hanging position and as such the respondents No.2 is not willing to adjust the appellant on the post of PST (BPS-12).
- H- That valuable right of the appellant has been accrued, therefore under the prevailing rules the appellant is entitled to be adjusted on the post of PST with all back benefits.
- I- That the inaction of the respondent Department by not accepting the arrival report of the appellant against the post of PST (BPS-12) and not releasing the monthly salaries of the appellant is against the principle of natural justice.
- J- That the appellant seeks permission to advance other grounds and proofs at time of hearing.

It is, therefore, most humbly prayed that the appeal of appellant may be accepted as prayed for..

Dated: 14.12.2022.

APPELLANT  
  
HUKMAN WALI

THROUGH:  
  
MIR ZAMANSAFI  
ADVOCATE

**CERTIFICATE:**

It is certified that no other earlier appeal was filed between the parties.

  
DEPONENT

**LIST OF BOOKS:**

- 1- CONSTITUTION OF PAKISTAN, 1973
- 2- SERVICES LAWS BOOKS
- 3- ANY OTHER CASE LAW AS PER NEED

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

APPEAL NO. \_\_\_\_\_/2022

**HUKMAN WALI**

**VS**

**EDUCATION DEPTT:**

**AFFIDAVIT**

I Mir Zaman Safi, Advocate High Court, Peshawar on the instructions and on behalf of my client do hereby solemnly affirm and declare that the contents of this **service appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.



**MIR ZAMAN SAFI,**  
Advocate  
High Court, Peshawar



## OFFICE OF THE DISTRICT EDUCATION OFFICER MALE LAKKI MARWAT

A-6

### APPOINTMENT ORDER:

Consequent upon the recommendations of the Departmental Selection Committee, appointments of the following One Hundred & Eighty Five (185) candidates are hereby ordered against the vacant posts of **Primary School Teacher-PST** on school based policy in BPS-12 BPS-12 (Rs. 13320-960-42120) @ Rs. 13320/- fixed plus usual allowances as admissible under the existing policy/notification issued vide. SO(PE)4-5/SSRC/ Meeting/ 2012/Teaching Cadre Dated: 13-11-2012 and SO (PE)4-5/SSRC/ Meeting/ 2012/ Teaching Cadre/2017 Dated: 30-01-2018 of Provincial Government in teaching cadre on the terms and conditions given below with effect from 16-01-2019.

S#	Name of Candidate	Father's Name	Date of Birth	CNIC No	Merit Position	Union Council	Place of Posting
1.	Changiz Ahmau	Arif Ullah	04-03-91	1120180413229	139.35	Abba Khel	GPS Muhammad Gul Abba Khel
2.	Hikmat Ullah	Naimat Ullah	01-01-93	1120110939555	139.11	Abba Khel	GPS Mohallah Shah Sahib, Aba Khel
3.	Khan Badshah	Salakh Khan	08-11-91	1120132926565	135.18	Abba Khel	GPS No. 1 Abaa Khel
4.	Afaq Ullah Khan	Ikram Ullah Khan	16-04-92	1120191402389	138.25	Abdul Khel	GPS No. 1 Chuhwar Khel
5.	Altiq Ur Rehman	Shamal Khan	31-03-96	1120101421749	134.82	Abdul Khel	GPS Alawal Khel
6.	Kamran Ullah	Asmat Ullah	01-01-89	1120113942037	134.62	Abdul Khel	GPS No. 3 Jhang Khel
7.	Asif Ullah	Arnar Ullah	08-05-92	1120101897801	131.25	Abdul Khel	GPS No. 1 Abdul Khel
8.	Muhammad Ibrahim Khan	Muhammad Ayub	25-02-89	1120135471161	130.91	Abdul Khel	GPS No. 1 Chuhar Khel
9.	Ashraf Ali Khan	Hazrat Ali Khan	09-03-90	1120157878683	129.68	Abdul Khel	GPS No. 2 Jhang Khel
10.	Zia Ur Rehman	Shamal Khan	20-04-92	1120167869683	128.41	Abdul Khel	GPS Alawal Khel
11.	Mishkat Ullah Khan	Muhammad Zamir Khan	22-10-91	1120173056353	126.75	Abdul Khel	GPS Bahu Khel
12.	Kalim Ullah Khan	Sahib Jan Khan	10-05-89	1120175668531	125.85	Abdul Khel	GPS No. 1 Chuhar Khel
13.	Naqeeb Ullah Khan	Inaya Ullah Khan	05-04-94	1120115246873	132.15	Ahmad Khel	GPS Wanda Zarif Wal
14.	Farman Ullah	Amar Ullah	04-02-91	1120190643473	131.16	Ahmad Khel	GPS Shah Hassan Khel
15.	Imran Ullah	Taj Ali Khan	20-02-92	1120199877265	122.68	Ahmad Khel	GPS No. 1 Ahmad Khel
16.	Shakir Usman	Muhammad Arnin Khan	01-02-94	1120203455547	140.03	Abu Samand Begu Khel	GPS Nar Raza Khan Adam Zai
17.	Adnan Jalil	Muhammad Jalil Khan	10-08-94	1120199848915	135.92	Abu Samand Begu Khel	GPS Nar Sultan Mehmoed
18.	Fida Ullahi Shah	Lal Badshah	30-03-87	1120169202553	135.81	Abu Samand Begu Khel	GPS Abu Samand Khaisor



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S#	Name of Candidate	Father's Name	Date of Birth	CNIC No	Merit Position	Union Council	Place of Posting
19.	Muhammad Zahid Khan	Khan Badshah	18-01-93	1120186999947	132.50	Abu Samand Begu Khel	GPS Nar Sahib Khan
20.	Zohaib Khan	Atta Ullah Khan	01-10-89	1120146690863	131.46	Abu Samand Begu Khel	GPS Nasar Din Begu Khel
21.	Zakir Usman	Muhammad Amin Khan	11-03-92	1120195637323	129.33	Abu Samand Begu Khel	GPS Nasar Din Begu Khel
22.	Muhammad Anwar Hayat	Hayat Ullah Khan	24-01-94	1120181659513	127.94	Abu Samand Begu Khel	GPS Abu Samand Khaisor
23.	Naveed Ullah Khan	Naimat Ullah Khan	14-08-89	1120163206297	126.59	Abu Samand Begu Khel	GPS Nar Purdal Begu Khel
24.	Rizwan Ullah	Mir Sahib Khan	07-07-85	1120174464757	125.59	Abu Samand Begu Khel	GPS Sarfaraz Landaka
25.	Zafran Tahir	Tahir Shah	12-03-86	1120168876847	125.17	Abu Samand Begu Khel	GPS Nasar Din Begu Khel
26.	Ihsan Ullah Khan	Khair Ullah Khan	05-04-93	1120124895863	124.10	Abu Samand Begu Khel	GPS Nar Sultan Mehmood
27.	Ateeq Ullah Khan	Abdur Rauf Khan	03-03-92	1120174704505	123.47	Abu Samand Begu Khel	GPS Nar Sultan Mehmood
28.	Shakir Ullah Khan	Zahid Ullah Khan	12-03-94	1120112502447	138.56	Behram Khel	GPS Baqi Jan Behram Khel
29.	Muhammad Tariq	Adani Khan	08-02-88	1120173503205	137.47	Behram Khel	GPS Behram Khel
30.	Irfan Ullah	Saif Ullah Khan	06-05-87	1120113417113	137.09	Behram Khel	GPS No. 2 Adam Zai
31.	Irfan Ullah	Zahid Ullah	09-10-93	1120173188473	136.141	Behram Khel	GPS No. 2 Tari Khel
32.	Muhammad Anwaar Ullah	Muhammad Abbas Khan	02-08-90	1120182969617	140.53	Baist Khel	GPS Ghandi Umer Chikar
33.	Ejaz Ahmad	Ibrahim Khalil	19-03-83	1120133685763	140.12	Baist Khel	GPS Kotka Amand
34.	Aziz Ur Rehman	Pasham Khan	10-02-93	1120203448411	140.08	Baist Khel	GPS No. 1 Baist Khel
35.	Muhammad Muslim Khan	Saleem Khan	08-03-93	1120129683355	135.30	Baist Khel	GPS Kotka Sharbat Khan
36.	Shakoor Ur Rehman	Hazrat Ali Khan	14-08-93	1120171499271	145.07	Bakhmal Ahmad Zai	GPS Baji Mughal Khel
37.	Dil Nawaz Khan	Muhammad Nawaz Khan	08-11-85	1120193242775	140.50	Bakhmal Ahmad Zai	GPS Gulzadin Bragi
38.	Gul Subkhan	Muhammad Wali Khan	21-03-89	1120155801007	136.24	Bakhmal Ahmad Zai	GPS Bakhmal Ahmad Zai Bala
39.	Fida Muhammad Khan	Khan Nawaz Khan	20-09-93	1120153047011	134.76	Bakhmal Ahmad Zai	GPS No.1 Khan Khel Mandozai
40.	Muhammad Zubair Khan	Juma Khan	27-03-91	1120113974229	132.18	Bakhmal Ahmad Zai	GPS Bakhmal Ahmad Zai Bala
41.	Waheed Ullah Khan	Asmat Ullah Khan	03-04-92	1120141208297	131.05	Bakhmal Ahmad Zai	GPS No.1 Bragi
42.	Hussain Ali Khan	Bahadar Khan	20-03-87	1120183654345	130.04	Bakhmal Ahmad Zai	GPS No.2 Khan Khel Mandozai

S#	Name of Candidate	Father's Name	Date of Birth	CNIC No	Merit Position	Union Council	Place of Posting
43.	Hukman Wali	Ali Abbas Khar	05-09-94	1120195554731	128.63	Bakhmal Ahmad Zai	GPS Nazar Wali
44.	Zabeeh Ullah Khan	Dilber Jan	10-03-89	112019532425	125.26	Bakhmal Ahmad Zai	GPS Kotka Mastaran
45.	Noor Ul Alamin	Amir Khan	07-03-92	1120102056415	124.58	Bakhmal Ahmad Zai	GPS Baji Adam Khan
46.	Shakir Ullah	Sabz Ali Khar	01-02-87	1120170306201	123.29	Bakhmal Ahmad Zai	GPS Syed Azam Bragi
47.	Waheed Gul	Shahzad Khar	16-02-87	1120184663447	122.20	Bakhmal Ahmad Zai	GPS Baji Adam Khan
48.	Waqas Khan	Kamal Khar	10-04-90	1120101029507	137.85	Darra Pezu	GPS No. 2 Darra Pezu
49.	Abdul Haleem	Muhammad Haleem	18-03-92	1120140018965	136.27	Darra Pezu	GPS Shahbaz Khel
50.	Imran Ullah Khan	Rahmat Ullah Khan	28-02-84	1120165497587	135.94	Darra Pezu	GPS Shahbaz Khel
51.	Jahanzeb Khan	Jehangeer Khar	09-02-94	1120119787879	134.09	Darra Pezu	GPS Wanda Gul Mir
52.	Muhammad Shakeel	Mir Ghulam	02-04-88	1120154717273	132.97	Darra Pezu	GPS Warghar Dara Pezu
53.	Muhammad Shoaib Khan	Amir Zaman	12-02-89	1120190390383	132.67	Darra Pezu	GPS Shahbaz Khel
54.	Akhter Zaman	Nizam Khar	08-02-93	1120191105847	132.37	Darra Pezu	GPS No. 2 Aghzar Khel
55.	Muhammad Jamshed Alam Khan	Nowioz Khar	01-10-94	1120144526919	132.32	Darra Pezu	GPS Shahbaz Khel
56.	Muhammad Ahmad	Ghulam Sadiq	01-04-90	1120123715241	132.07	Darra Pezu	GPS Wanda Jogi
57.	Rafi Ullah Khan	Muhammad Qayim Khar	25-10-89	1120179030027	125.79	Dara Tang	GPS No. 2 Land Ahmad Khel
58.	Imran Ullah Khan	Amir Khan	15-07-92	1120109920431	124.99	Dara Tang	GPS Wanda Fateh Khan Janobi
59.	Imran Ullah Khan	Gul Nawaz Khan	09-09-91	1120183171703	125.03	Daraka Suleman Khel	GPS Kabal Suleman Khel
60.	Mamoor Ahmad Khan	Abid Ullah Jan	20-03-81	1120175317157	123.01	Daraka Suleman Khel	GPS Dharaka Aziz Khan
61.	Sami Ullah Khan	Rab Nawaz Khar	11-09-91	1120112239643	121.21	Daraka Suleman Khel	GPS Kotka Mir Badshah
62.	Zahoor Khan	Munawar Khar	24-04-93	1120138431317	120.12	Daraka Suleman Khel	GPS Kotka Hayat Khan Suleman Khel
63.	Shah Mehmood Khan	Hashim Khan	06-04-93	1120184600439	117.62	Daraka Suleman Khel	GPS Kotka Haibat Khan Suleman Khel
64.	Munir Ahmad Khan	Khushal Khan	31-12-94	1120134908811	116.43	Daraka Suleman Khel	GPS Landi Mir Saalam
65.	Imran Khan	Ayaz Khan	23-04-94	1120146470863	138.14	Gandi Khan Khel	GPS No. 1 Gandi Khan Khel
66.	Fahim Khan	Muhammad Nawaz	10-07-91	1120186117987	136.45	Gandi Khan Khel	GPS Kotka Sher Khan
67.	Waseem Jan	Sheran Jan	05-04-91	1120103412295	134.74	Gandi Khan Khel	GPS No. 3 Gandi Khan Khel
68.	Farman Ullah Khan	Sher Ali Khan	02-05-82	1120104066045	132.76	Gandi Khan Khel	GPS Amin Jabu Khel

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S#	Name of Candidate	Father's Name	Date of Birth	CNIC No	Merit Position	Union Council	Place of Posting
69.	Kaleem Ullah Khan	Awal Khan	25-03-84	112011253621	137.08	Isak Khel	GPS No. 2 Zangi Khel
70.	Naseem Ur Rehman	Abdur Rehman	03-10-91	1120114985501	139.20	Kaka Khel	GPS Mela Mandra Khel
71.	Tariq Kamal Khan	Ghulam Qadir Khan	25-03-86	1120115077667	129.51	Kaka Khel	GPS No. 2 Kaka Khel
72.	Zafar Waheed	Nasser Ud Din	02-07-90	11201152588541	128.36	Kaka Khel	GPS No. 3 Kaka Khel
73.	Fazal Mehmood	Muhammad Ali Khan	28-12-84	1120115073079	128.16	Kaka Khel	GPS No. 4 Kaka Khel
74.	Nauman Khan	Abdur Rauf Khan	08-02-91	1120113727563	127.66	Kaka Khel	GPS No. 2 Kaka Khel
75.	Noor Kamal Khan	Umer Khan	27-02-89	11201104033357	142.85	Kot Kashmir	GPS No. 2 Bachkan Ahmad Zai
76.	Irfan Ullah Khan	Aziz Khan	01-04-86	11201107022117	136.51	Kot Kashmir	GPS Chandu Khel
77.	Haroon Ur Rashid	Abdur Rashid	04-03-94	11202103457297	134.97	Kot Kashmir	GPS No. 1 Kot Kashmir
78.	Kashif Ur Rehman	Syed Rehman	10-12-92	3830221951223	132.16	Kheru Khel Pacca	GPS Qayum Pahar Khel Pacca
79.	Fareed Ullah Khan	Abdul Warab Khan	18-10-90	11201151906483	126.02	Kheru Khel Pacca	GPS Wanda Faqiran
80.	Zakir Ullah Khan	Sami Ullah Khan	18-02-89	1120112817639	115.63	Kheru Khel Pacca	GPS No. 4 Sheri Khel
81.	Khizer Hayat	Khudad Khan	06-02-91	11201138770757	144.85	Lakki-1	GPS No. 2 Toti Abad
82.	Sohail Akhter	Muhammad Aziz Khan	01-03-94	11201135575295	132.64	Landiwah	GPS Asat Landiwah
83.	Hizbullah	Haliz Abdul Qadir	05-01-90	11201179769001	132.42	Landiwah	GPS Aman Ullah Landiwah
84.	Sadiq Ullah Shah	Muhammad Farooq	15-12-91	11201133220785	131.89	Landiwah	GPS No. 1 Mir Azam Machan Khel
85.	Sabir Shah	Taj Ali Khan	02-02-91	11201155258177	129.92	Landiwah	GPS Wanda Faqiran
86.	Arif Ullah	Latif Ullah	01-04-91	11201133500787	127.29	Landiwah	GPS Bahadar Mir Azam Machan Khel
87.	Noor Jamil Khan	Kabir Khan	05-06-93	11201154401167	126.93	Landiwah	GPS Wanda Gulzari
88.	Muhammad Asif	Abdul Khanan Khan	12-02-91	1120112757867	124.93	Landiwah	GPS No. 1 Mir Azam Machan Khel
89.	Ishfaq Ahmad	Hazrat Jamal	24-08-92	11201186430383	124.88	Landiwah	GPS Aman Ullah Landiwah
90.	Wasim Akram Khan	Sail Ullah Khan	05-03-91	11201141875761	123.82	Landiwah	GPS No. 1 Mir Azam Machan Khel
91.	Muhammad Aslam Khan	Janat Mir	06-06-87	11201128415703	123.15	Landiwah	GPS Bahadar Mir Azam Machan Khel
92.	Muhammad Salman Khan	Muhammad Khalid Khan	03-03-92	11201101784023	148.73	Masha Mansoor	GPS Ghairat Khel Masha Mansoor
93.	Abdur Rehman	Panda Khan	03-01-92	11201154265675	137.17	Masha Mansoor	GPS Azim Kalay Masha Mansoor
94.	Mati Ullah	Kabir Khan	14-06-93	11201128355665	135.94	Masha Mansoor	GPS No. 2 Hayat Khel

S#	Name of Candidate	Father's Name	Date of Birth	CNIC No	Merit Position	Union Council	Place of Posting
95.	Gulfam Ullah Khan	Adan Khan	08-02-91	1120158631761	134.08	Masha Mansoor	GPS Kuti Khel
96.	Farid Ullah	Rustam Khan	04-02-91	1120154250733	135.17	Mash Masti Khani	GPS Atashi Machan Khel
97.	Ahmad Ali	Khan Malook	30-05-93	1120155289171	130.68	Mash Masti Khani	GPS No. 1 Mash Masti Khani
98.	Zia Ur Rehman	Gul Jayyan	20-03-93	1120101431025	126.84	Mash Masti Khani	GPS Sarkati Michen Khel
99.	Asif Javed	Gul Muhammad	08-12-92	1120109708265	126.43	Mash Masti Khani	GPS Kotka Muhammad Ali Khan
100.	Sajjad Ahmad	Muhammad Hasnim	01-05-76	1120103317529	124.50	Mash Masti Khani	GPS Wanda Chikari
101.	Nek Nam Ullah	Saif Ullah Khan	05-01-89	1120130677195	122.98	Mash Masti Khani	GPS No. 1 Mash Masti Khan
102.	Muhammad Shahab	Akbar Zaman	01-05-88	1120125720551	121.40	Mash Masti Khani	GPS Kotka Muhammad Ali Khan
103.	Muhammad Irfan	Muhammad Nawaz	15-02-89	1120107517631	137.21	Marmandi Azim	GPS Nar Muhammad Ghazni Khel
104.	Muhammad Zahid	Sherin Jan	15-02-92	1120133625115	135.64	Marmandi Azim	GPS Nar Bakhmal Ahmad Zai
105.	Imran Khan	Muhammad Hussain	15-03-87	1120136883853	133.77	Marmandi Azim	GPS Nar Samand Adam Zai
106.	Fazal Rahim Khan	Abdul Rahim Khan	12-04-91	1120171958833	133.11	Marmandi Azim	GPS Mughal Manji Wala
107.	Arif Ullah Khan	Munazz Khan	14-04-94	1120106187735	132.55	Marmandi Azim	GPS Nar Gul Hassan Shah
108.	Shams Ur Rehman	Abdul Qayyum	18-07-84	1120103503697	129.68	Marmandi Azim	GPS Marmandi Azim
109.	Sajid Khan	Muhammad Din	10-05-93	1120157433333	129.45	Marmandi Azim	GPS Kala Manji Wala
110.	Anjad Perwaiz Khan	Naimat Ullah Khan	20-02-90	1120120823393	129.03	Marmandi Azim	GPS Nar Bakhmal Ahmad Zai
111.	Waseem Khan	Inayat Ullah	25-08-89	1120159857377	127.25	Marmandi Azim	GPS Sardari Kela
112.	Asif Jamal	Noor Jamal	03-08-93	1120141180269	126.95	Marmandi Azim	GPS Kotka Muhammad Hassan
113.	Atif Ullah Khan	Ihsan Ullah Khan	30-08-92	1120181454125	126.38	Marmandi Azim	GPS Sardari Kela
114.	Attique Ullah	Shaista	20-05-94	1120110344795	126.35	Marmandi Azim	GPS Kotka Muhammad Hassan
115.	Najeeb Ullah	Haji Aslam Khan	14-12-91	1120197801587	139.60	Mama Khel Marwat	GPS Mama Khel Marwat
116.	Ikram Ullah	Muhammad Jalal	10-09-91	1120150454591	136.06	Mama Khel Marwat	GPS Dray Plari Mama Khel
117.	Hafeez Ullah	Muhammad Ajmal Khan	10-10-91	1120138646057	134.75	Mama Khel Marwat	GPS Nar Sahibzada Khost
118.	Nadeem Ullah Khan	Hameed Ullah Khan	14-02-92	1120149234893	134.73	Mama Khel Marwat	GPS Nasr Khel
119.	Fazal Subhan	Mushtaq Ahmad	04-04-90	1120172024411	134.63	Mama Khel Marwat	GPS Nar Sahibzada Khost
120.	Sultan Ali	Zarwali Khan	16-03-87	1120178109303	133.11	Mama Khel Marwat	GPS Zabta Khan Nasr Khel

S#	Name of Candidate	Father's Name	Date of Birth	CNIC No	Merit Position	Union Council	Place of Posting
121.	Ishaq Ali Shah	Muhammad Rasool	25-12-93	11201:57625249	132.84	Mama Khel Marwat	GPS Nasr Khel
122.	Fawad Muhammad	Khari Bahadar	10-04-83	11201:33313435	132.35	Mama Khel Marwat	GPS Nasr Khel
123.	Muhammad Ishaq Khan	Muhammad Ismail	03-04-93	11201:9775943	130.67	Mama Khel Marwat	GPS No.1 Jadeed Abadi Mama Khel
124.	Musarrat Ullah Khan	Muhammad Ayaaz Khan	04-04-90	11201:8504777	130.52	Mama Khel Marwat	GPS Zabta Khan Nasr Khel
125.	Muhammad Ishaq	Muhammad Amin Ali	22-10-81	12101:31069009	130.37	Mama Khel Marwat	GPS Kotka Nawab
126.	Sharif Ullah Khan	Muhammad Hanif Khan	05-04-91	11201:1180867	130.33	Mama Khel Marwat	GPS Kotka Nawab
127.	Yasir Issa	Lissa Khan	25-12-90	11201:8205737	130.22	Mama Khel Marwat	GPS Kotka Nawab
128.	Saqib Saeed	Saeed ur Rehman	20-02-92	11201:3399867	128.12	Mama Khel Marwat	GPS Kotka Nawab
129.	Mahmood Ali	Muhammad Fazal Ghani	21-02-91	11201:0230527	141.45	Naurang	GPS No. 1 Naurang
130.	Afrasiab Shakat	Sharikat Ullah	07-03-95	61101:7204059	140.59	Naurang	GPS Kotka Ghulam Shah
131.	Saif Ullah	Muhammad Sabiq	12-09-87	11201:0864025	137.22	Naurang	GPS Kotka Sikandar Khan
132.	Shahid Faraz Khan	Gul Faraz Khan	05-06-90	11201:7519647	135.71	Naurang	GPS Kotka Sikandar Khan
133.	Qismat Ali	Syed Amir Khan	09-05-94	11202:3448273	135.24	Naurang	GPS Assu Keela
134.	Abdul Basit	Nazir Ahmad	14-10-96	11201:8084071	132.94	Naurang	GPS Kotka Sikandar
135.	Abdul Wahed Khan	Ajmal Khan	07-04-81	11201:6369647	132.59	Naurang	GPS Mohallah Zargaran
136.	Atta Ullah Khan	Hasnmat Ullah	20-05-95	11202:3503035	131.74	Naurang	GPS Behari Colony
137.	Muhammad Aamir Khan	Abd il Khaliq	04-04-89	11201:7707143	131.67	Naurang	GPS Nar Faqir Masoom
138.	Rafiq Ullah Khan	Sani Ullah Khan	28-12-88	11201:6013725	131.32	Naurang	GPS Kotka Allah Dad Begu Khel
139.	Saqib Nawaz	Mir Nawaz	10-08-89	11201:9712647	131.24	Naurang	GPS Behari Colony
140.	Farid Ullah	Rahim Yar Khari	12-02-89	11201:3421449	130.19	Naurang	GPS Nar Faqir Masoom
141.	Muhammad Nazir Khan	Muhammad Easir Khari	03-01-85	11201:2021283	129.91	Naurang	GPS Kotka Sikandar
142.	Muhammad Ismail Khan	Mohib ur Rasool	13-12-90	11201:6108451	133.55	Pahar Khel Thall	GPS Wanda Khawaz
143.	Shahab ur Rehman	Saif ur Rehman	30-05-94	11201:7330825	133.51	Pahar Khel Thall	GPS No.1 Pahar Khel Thall
144.	Habib Ullah	Sharif Ullah	03-01-92	11201:3028899	133.35	Pahar Khel Thall	GPS Wanda Shamadu
145.	Barkat Ullah	Azaaz Khan	01-01-92	61101:39714757	130.54	Pahar Khel Thall	GPS Wanda Shamadu
146.	Irfan Ullah	Abd il Salar Khari	14-03-88	12101:4055945	130.14	Pahar Khel Thall	GPS No.4 Wanda Shahab Khel
147.	Abeed Ullah	Haq Nawaz Khari	04-03-91	11201:8015815	127.00	Pahar Khel Thall	GPS No.2 Langer Khel
148.	Shakir Ullah	Haniseed Ullah Jan	27-04-93	12101:1208357	126.28	Pahar Khel Thall	GPS Kotka Masoom

12

S#	Name of Candidate	Father's Name	Date of Birth	CUIC No	Merit Position	Union Council	Place of Posting
149.	Gul Aslam Khan	Azeem Khan	15-03-91	1120112391301	125.74	Pahar Khel Thal	GPS Wanda Khan-Dowran
150.	Qudrat Ullah	Muhammad Rasool	12-01-88	1120118887379	124.08	Pahar Khel Thal	GPS Kotka Waziran
151.	Khaliq Samim	Nadir Khan	11-08-90	1120119086501	122.94	Pahar Khel Thal	GPS Wanda Khawaz
152.	Waqar Ullah	Zait Ullah Khan	27-12-87	11201133938199	122.72	Pahar Khel Thal	GPS No.1 Pahar Khel Thal
153.	Kalim Ullah	Ghulam Rasool	29-12-93	1120112339411	122.52	Pahar Khel Thal	GPS Wanda Khawaz
154.	Farman Ullah Khan	Hayat Ullah Khan	18-12-93	11201106703695	121.39	Pahar Khel Thal	GPS Wanda Shamadu
155.	Tariq Zaman	Gul Khan	08-04-92	1120119940829	120.53	Pahar Khel Thal	GPS No.3 Shatabh Khel
156.	Rashid ur Rehman	Araiz Khan	20-04-86	11201109834701	120.32	Pahar Khel Thal	GPS No.1 Pahar Khel Thal
157.	Muhammad Tahir Khan	Abdul Majid Khan	02-10-90	11201108129843	119.54	Pahar Khel Thal	GPS Wanda Laghman
158.	Majeed Khan	Sher Ali Khan	02-01-93	1120115226603	119.44	Pahar Khel Thal	GPS Kotka Waziran
159.	Faheem Ullah Khan	Zafir Ullah	07-04-96	11201134163627	118.99	Pahar Khel Thal	GPS Kotka Waziran
160.	Abid Ullah Khan	Asmat Ullah Khan	26-03-82	1120118742287	118.40	Pahar Khel Thal	GPS Wanda Laghman
161.	Abdus Sattar	Abdul Wasab	25-10-92	11201108045079	135.45	Samandi	GPS No.1 Abhase
162.	Muhammad Jehanzeb Kah	Abdul Latif Khan	15-04-93	1120112420869	142.94	Shakh Quli Khan	GPS Shakh Quli Khan
163.	Shafi Ahmad	Jamil Ahmad	01-11-90	11201189632077	134.94	Shakh Quli Khan	GPS No.1 Passani
164.	Irfan Ullah Khan	Harid Ullah Khan	01-07-94	1120117595047	127.28	Shakh Quli Khan	GPS Shakh Quli Khan
165.	Rafiq Ullah Khan	Muhammad Atzal Khan	10-03-91	1120114623461	123.94	Shakh Quli Khan	GPS No.1 Passani
166.	Hamza Ali Shah	Late Shah	04-01-93	11202103483519	116.97	Shakh Quli Khan	GPS Shakh Quli Khan
167.	Muhammad Rauf	Rais Khan	11-02-94	11202103469585	113.57	Shakh Quli Khan	GPS No.1 Passani
168.	Aziz Ullah	Sait Ullah	05-03-93	11202103407033	109.19	Shakh Quli Khan	GPS Nar Haidaran
169.	Mushahid Ullah	Naqib Ullah	01-02-94	11202103454671	108.62	Shakh Quli Khan	GPS Mumtaz Passani
170.	Tanveer Hassan	Habib Ur Rehman	02-03-93	11201103462381	107.39	Shakh Quli Khan	GPS Mumtaz Passani
171.	Kalim Ullah Khan	Muhammad Akram	01-10-94	11202103476561	107.31	Shakh Quli Khan	GPS Nar Haidaran
172.	Akhter Munir	Astani Munir	07-12-82	1120117485467	137.38	Titter Khel	GPS No.1 Titter Khel
173.	Asif Ullah Khan	Gul Nawaz Khan	01-03-93	112011801037	134.94	Titter Khel	GPS No.1 Titter Khel
174.	Tazeem Ullah Khan	Hakim Jar Khan	31-03-92	11201102646375	134.37	Titter Khel	GPS No.2 Titter Khel
175.	Kifayat Ullah	Najib Ullah Khan	23-10-95	11201114424209	131.91	Titter Khel	GPS Chur Khel, Titter Khel
176.	Rahman Ullah	Ajal Khan	01-10-86	11201100030363	137.81	Tajor	GPS No.2 Tajor
177.	Naseer Muhammad Khan	Taj Muhammad Khan	02-04-94	1120110076121	141.70	Tajazai	GPS No.1 Tor Lawang Khel

S#	Name of Candidate	Father's Name	Date of Birth	CNIC No	Merit Position	Union Council	Place of Posting
178.	Muhammad Ibrar Khan	Balqiaz Khan	28-03-97	1120203612237	126.72	Top Takhti Khel	GPS Habib Ullah Takhti Khel
179.	Israr Ullah Khan	Kiramat Ullah Khan	12-02-90	1120104385337	120.30	Top Takhti Khel	GPS Sheikh Landak
180.	Kaleem Ullah	Habib Ullah Jan	03-01-95	1120203559207	117.34	Top Takhti Khel	GPS Sheikh Landak
181.	Rahmat Ullah	Atta Ullah Khan	30-03-92	1110105963027	113.55	Top Takhti Khel	GPS No. 2 Takhti Khel
182.	Naqib Ullah	Dil Jan	07-02-90	1120102995091	113.37	Top Takhti Khel	GPS Tarkha Bazi Khel
183.	Sami Ullah Khan	Naqib Ullah Khan	09-01-87	1110108442915	111.88	Top Takhti Khel	GPS Tarkha Bazi Khel
184.	Muhammad Tariq Nadeem	Muhammad Naseem	30-03-91	1120102404235	110.52	Top Takhti Khel	GPS Zandi Akber Khan
185.	Khayal Mar Jan	Dil Jan	20-03-92	1120103499199	105.09	Top Takhti Khel	GPS Zandi Akber Khan

**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 w.e.f. 16-01-2019 to 15-01-2020.
4. They should not be handed over charge if they exceed 35 years or below 18 years of age. Age relaxation case may be submitted to competent authority (if required).
5. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the District Education Office (M) Lakki Marwat, anyone found producing bogus certificate will be reported to the law enforcing agencies for further action and said appointment will be cancelled automatically & candidate concerned will have no right of appeal at any forum. Expenditure on verification will be borne by the appointees.
6. Their services are liable to terminate on one month notice from either side. In case of resignation without prior notice, one-month pay/allowances shall be forfeited to the Government Treasury.
7. Pay will not be drawn until and unless a certificate regarding verification of their documents is issued by this office.
8. They should join their posts within 15 days of the issuance of this notification. In case of failure to join the post within stipulated period, their appointment will stand expired automatically and subsequent no appeal etc shall be entertained.
9. Health and Age certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. Before handing over charge, they will have to sign an agreement on stamp paper with the Department, otherwise this order will not be valid.
11. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
12. Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
13. Their appointment is made on school based. They will have to serve at the place of posting and their services are not transferable to any other station.
14. Before handing over charge, once again their documents may be checked by the DDO concerned, if they have not the required relevant qualifications as per rules they may not be handed over charge of the post.
15. If anyone wrong position holder candidate having low score was appointed erroneously, his appointment shall be considered cancelled at any time.

14

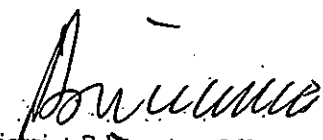
16. They will receive 9 months in-service mandatory professional training at PITE/RITE.
17. They may be re-adjusted / shuffled in their optioned schools in order to ensure merit of the next meritorious / deserving candidate if required.

(BAKHTULLAH SHAH)  
District Education Officer  
(Male) Lakki Marwat

Endst. No. 811-19/NTS Appointment/2019/PST Dated Lakki Marwat the Jan-15-2019

Copy forwarded for information & necessary action to:-

1. The District Accounts Officer, Lakki Marwat.
2. The Dy. District Education Officer (Male) Lakki Marwat.
3. The District Monitoring Officer (IMU) Lakki Marwat.
4. The Medical Superintendent DHQ Hospital, Town Tajazai, Lakki Marwat.
5. The Sub-Divisional Education Officer (Male) Concerned.
6. The Assistant Sub-Divisional Education Officer (Circle) Concerned.
7. The Head Teacher School Concerned.
8. The Candidates Concerned.
9. Office File.

  
District Education Officer  
(Male) Lakki Marwat





MEDICAL FITNESS CERTIFICATE

B. (15)

Name of Official ..... Hukman wali .....

Religion..... Islam ..... Muslim.....

Father/Husband Name..... Ali Abbas Khan .....

Residence..... Kolka Ghulam Quda 1, Khan Khel .....

..... Mandazi P/O Khan Khel Mandazi Lakki Marwat .....

Dated of Birth..... 05/02/1994 (NIC No. 11201-955473-1) .....

Exact Height by measurement..... 5' 11" .....

Personal Mark of Identification..... Nil .....

Signature of Official..... [Signature] .....

Signature of Head of Office..... [Signature] .....

Seal of Office.....

I do hereby certify I have examined..... Hukman wali ..... a candidate  
 for employment in the office of the ..... DEO Lakki Marwat ..... and cannot  
 discover that he/she had any diseases communicable or other constitutional affection or bodily  
 infirmity except..... Nil .....

I do not consider this as disqualification for employment in the office of the .....

..... DEO (M) Lakki Marwat ..... His/Her  
 age according to his own Statement..... Twenty four years and by appearance  
 about (24) yrs (.....)..... years.



LEFT/RIGHT HAND THUMB AND FINGER IMPRESSIONS.....

[Signature]  
 Medical Superintendent  
 PHQ Hospital Lakki Marwat.  
[Signature]  
 Medical Superintendent  
 D.H.Q Hospital Lakki Marwat

16/11/2019

[Signature]

70-69  
16/01/2019

C-16

**CHARGE REPORT**

According to Order No. 811-19/NTS/2019/PST

Dated: 15/01/2019 Issued vide Office of the Honorable D.E.O Male  
Lakki Marwat. That Mr. Hukman wali S/o Ali Abbas Khan  
UIC Bakhmal Ahmadzai Is here by appointed as PST teacher,

Scale No. 12. He took over charge of his post B/noon on dated 16/01/2019

at G.P.S Nazir Walai District Lakki Marwat.

Report is submitted to Education Office and All Concerned.

1. H. Qureshi  
16/01/2019  
Charge Taker

2. [Signature]  
Charge Giver

C/S  
Almad  
ASD P&T  
Tayou  
26-01-2019

[Signature]

M.T.I. DHQ TEACHING HOSPITAL, BANNU

Out patient Department

Name: Ullah  
OPD NO: 1569  
Date: 8/3/19

Night leg  
Sciatica

**NVC**

Tab Alcaic  
TC - 550

TC - 1-1

Actu Need  
03 weeks Rest

Cap Rizek Long  
(15 - 17)  
D.H.Q. Teaching Hospital  
Bannu

M.T.I. DHQ TEACHING HOSPITAL, BANNU

Out patient Department

Name: Ullah **D-17**  
OPD NO: 6722  
Date: 25/1/19

Plc B...  
M...  
B...  
o/k  
B...  
A...  
S...

BA  
C...  
1-1-20y  
P...  
1-1-1  
V...  
T...  
Complete Bed Rest - 1  
for 2 weeks

M.T.I. DHQ TEACHING HOSPITAL, BANNU

Out patient Department

Name: Ullah  
OPD NO: 21462  
Date: 22/3/19

C/o Back Pain  
C...  
W...  
Dx ...

Cap Rizek Long  
①

Tab Xtram  
1 + 1

Tab Nuboxal forte  
1 + 1

Tab Intis-D  
①

Actu ②  
Two weeks Complete Bed rest  
Medical Officer  
D.H.Q. Teaching Hospital  
Bannu

M.T.I. DHQ TEACHING HOSPITAL, BANNU

Out patient Department

Name: Ullah  
OPD NO: 15852  
Date: 1-3-19

C/o Back Pain  
Generalized Back Pain  
Weakness  
Tab ...  
Dx ...

Tab Nuboxal forte  
1 + 1

Tab Axial ...  
①

Cap Esso Long  
1 + 1

Tab Brixin  
1 + 1

Actu ③  
Three weeks Complete Bed rest  
Medical Officer  
D.H.Q. Teaching Hospital  
Bannu

*[Handwritten signature]*

M.T.I. DHQ TEACHING HOSPITAL, BANNU

Out patient Department

Name: 390116  
OPD NO: 32269  
Date: 25/4

C/A Ben...  
P. Ad...  
R...  
B...  
D...  
S...

Tab Toradol-p  
1 p 1  
Cap ESSO 4mg  
①  
Tab Qalsam-D  
①  
Tab Alposin  
①

③  
Three weeks  
Complete Bed rest  
Bannu  
Medical Officer  
D.H.Q Teaching Hospital  
Bannu

M.T.I. DHQ TEACHING HOSPITAL, BANNU

Out patient Department

Name: 310616  
OPD NO: 25704  
Date: 25/4/19 **18**

Tab. Nubex-5  
Lumbosacral ① 20 (1+1)  
Spine p. an. Tab. Panadol  
Pain radiate ① 20 (1+1)  
to ② leg. Tab. Qalsam-D  
① 20 (1+1)

Do complete bed rest for  
03 weeks.

Medical Officer  
D.H.Q Teaching Hospital  
Bannu  
25/4/19

M.T.I. DHQ TEACHING HOSPITAL, BANNU

Out patient Department

Name: U 66  
OPD NO: 36194  
Date: 13/5

In My opinion Mrs. Hulem...  
is fit for duty Job  
13/5/19

Bannu  
Medical Officer  
D.H.Q Teaching Hospital  
Bannu

M. [Signature]

خدمت خراب ڈسٹرکٹ ریجو کیسٹن آفیسر صاحب (M) ضلع ملیرت

18/A

درفورسٹ عسکر ادھر اسٹیشن فرمائے سائل از QPS نڈر برادری  
ضلع ملیرت ٹو QPS کو ملے سید اعظم بریگیڈ ضلع ملیرت

ضابطہ عالی : گذارش ذیل ہے

ایک سائل سنہ 2019ء 15 کو اور یہ سائلوں سے رجسٹر PST

مکلف QPS نڈر برادری کے تصنیفات کے بارے

2۔ یہ سائل کے عدالتوں میں Law and order کی حالت ناگفتہ بہ ہے

3۔ یہ سائل کے عدالتوں میں ایشیائی سخت دشمنیاں ہیں، جو سائل

کی زندگی کو ایشیائی نقطہ ہے۔ سائل اپنے دشمنوں کے نظر

میں First Target ہے۔ ابی FIR لے کر آئے ہیں

4۔ یہ سائل QPS سید اعظم بریگیڈ میں مبتلا ہے اس وقت یہ سائل

کو سائل اپنے ذرائع نہیں اصرار کرنے سے سہرا بیگم کی ہے

لہذا استدعا ہے کہ سائل کو جو پتہ بتا دیا گیا ہے نڈر برادری سے QPS سید اعظم بریگیڈ  
میں بھیج کرے۔ بالخصوص ڈیٹیل منٹ اور دیگر دیگر

سنہ 2019-2-16

صاحبان عالی شان علی عین صاحبان نے بریگیڈ میں ضلع ملیرت  
(P.T.O)

To,

The Sub-Divisional Education Officer,  
(Male) Lakki Marwat.

22/A

Subject:- APPEAL/APPLICATION IN RESPECT OF HUKMAN WALI  
PST GPS NAZIR WALAI LAKKI MARWAT.

Government Primary School Nazir Walai District Lakki Marwat

No: 105 /GPS Nazir Walai

Dated: 26/06/2019

To,

The District Education Officer (Male)  
Lakki Marwat.

E-19

Subject :- Duty Certificate

It is certified that Mr: Hukman Wali s/o Ali Abbas Khan was appointed as PST NTS (BPS 12) wide DEO (M) Lakki Marwat Order No.811-19 /NTS Appointed/2019/PST Dated 15/01/2019 S/ No.43 Took Charge in this School on 16/01/2019 Beforenoon. He was good moral character and dutiful.

R/Sir,

The teacher remained absent from his duty from 25/01/2019 till 12/05/2019 due to severe enmity and was attacked in the way to his school. He regularly comes to school from 13/05/19 till 16/09/19.

Hence Recommended and forwarded for necessary action. please.

HEAD TEACHER  
G.P.S Nazir Walai  
Head-Teacher  
Govt Primary School  
NazirWalai Lakki Marwat

P.T.O

Asst. Dist. Officer  
(E&S) Education  
(M) Pw Lakki Marwat

Ahmad  
ASD EOLs  
Tajari  
16/09/19

# رجسٹر حاضری مدرسین

23-6

2019ء

بابت ماہ ستمبر

نام	کرامت اللہ خان	حکمان ولی	خاندان
عہدہ	PSHT	PST	جو کبدر

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1												
2	8/15	کرامت اللہ	12/35	کرامت اللہ	7:30	کرامت اللہ	12:35	کرامت اللہ	12/35	کرامت اللہ	7:30	کرامت اللہ
3	8/15	کرامت اللہ	12/35	کرامت اللہ	7:30	کرامت اللہ	12:35	کرامت اللہ	12/35	کرامت اللہ	7:30	کرامت اللہ
4	7/-	کرامت اللہ	12/35	کرامت اللہ	7:30	کرامت اللہ	12:35	کرامت اللہ	12/35	کرامت اللہ	7:30	کرامت اللہ
5	7/-	کرامت اللہ	12/35	کرامت اللہ	7:30	کرامت اللہ	12:35	کرامت اللہ	12/35	کرامت اللہ	7:30	کرامت اللہ
6												
7												
8												
9												
10												
11												
12	8/30	کرامت اللہ	12/30	کرامت اللہ	8/30	کرامت اللہ	12/30	کرامت اللہ	12/30	کرامت اللہ	8/30	کرامت اللہ
13	7/30	کرامت اللہ	12/30	کرامت اللہ	7/15	کرامت اللہ	12/30	کرامت اللہ	12/30	کرامت اللہ	7/15	کرامت اللہ
14	7/30	کرامت اللہ	12/30	کرامت اللہ	7/30	کرامت اللہ	12/30	کرامت اللہ	12/30	کرامت اللہ	7/30	کرامت اللہ
15												
16	8/-	کرامت اللہ	12/30	کرامت اللہ	7/30	کرامت اللہ	12/30	کرامت اللہ	12/30	کرامت اللہ	7/30	کرامت اللہ
17	7/15	کرامت اللہ	12/30	کرامت اللہ	7/30	کرامت اللہ	12/30	کرامت اللہ	12/30	کرامت اللہ	7/30	کرامت اللہ
18	7/15	کرامت اللہ	12/30	کرامت اللہ	7/30	کرامت اللہ	12/30	کرامت اللہ	12/30	کرامت اللہ	7/30	کرامت اللہ
19	7/15	کرامت اللہ	12/30	کرامت اللہ	7/30	کرامت اللہ	12/30	کرامت اللہ	12/30	کرامت اللہ	7/30	کرامت اللہ
20	7/15	کرامت اللہ	10/30	کرامت اللہ	7/30	کرامت اللہ	10/30	کرامت اللہ	10/30	کرامت اللہ	7/30	کرامت اللہ
21	7/15	کرامت اللہ	12/30	کرامت اللہ	7/30	کرامت اللہ	12/30	کرامت اللہ	12/30	کرامت اللہ	7/30	کرامت اللہ
22												
23	7/50	کرامت اللہ	12/30	کرامت اللہ	7/30	کرامت اللہ	12/30	کرامت اللہ	12/30	کرامت اللہ	7/30	کرامت اللہ
24	7/20	کرامت اللہ	12/30	کرامت اللہ	7/30	کرامت اللہ	12/30	کرامت اللہ	12/30	کرامت اللہ	7/30	کرامت اللہ
25	7/20	کرامت اللہ	12/30	کرامت اللہ	7/25	کرامت اللہ	12/30	کرامت اللہ	12/30	کرامت اللہ	7/25	کرامت اللہ
26	7/20	کرامت اللہ	12/30	کرامت اللہ	7/20	کرامت اللہ	12/30	کرامت اللہ	12/30	کرامت اللہ	7/20	کرامت اللہ
27	7/20	کرامت اللہ	14/35	کرامت اللہ	7/25	کرامت اللہ	14/35	کرامت اللہ	14/35	کرامت اللہ	7/25	کرامت اللہ
28	7/20	کرامت اللہ	12/35	کرامت اللہ	7/30	کرامت اللہ	12/35	کرامت اللہ	12/35	کرامت اللہ	7/30	کرامت اللہ
29												
30	7/50	کرامت اللہ	12/35	کرامت اللہ	7/30	کرامت اللہ	12/35	کرامت اللہ	12/35	کرامت اللہ	7/30	کرامت اللہ
31												

attested

**Tahir Ahmad Khan**  
Assistant Distt. Officer  
(M) Ptv. Larkki Marwar

**Almasud**  
ASD  
26/09/19

قسم رخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
اتفاقہ	-	-	-	-	-	-	-	-	-	-	-	-
استحقاق	-	-	-	-	-	-	-	-	-	-	-	-
بیماری	-	-	-	-	-	-	-	-	-	-	-	-
میزان	-	-	-	-	-	-	-	-	-	-	-	-

دستخط ہیڈ ماسٹر

ٹیچر میٹری سٹورڈ 8 اردو بازار لاہور فون: 042-37226599

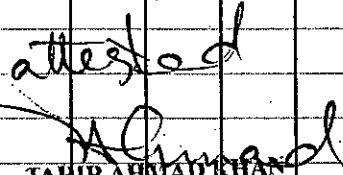
24

# رجسٹر حاضری مدرسین

2019ء

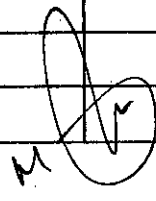
بابت ماہ اکتوبر

نام		کرامت اللہ خان		حکمان ولی		عہدہ	
		PSHT		PST			
تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	دستخط
1	8/20	کرامت اللہ	1/30	حکمان	8/20	حکمان	1/30
2	8/15	کرامت اللہ	2/30	حکمان	8/20	حکمان	2/30
3	8/15	کرامت اللہ	1/30	حکمان	8/20	حکمان	1/30
4	8/20	کرامت اللہ	11/30	حکمان	8/20	حکمان	11/30
5		C/leave		8/15	حکمان	1/30	حکمان
6		Sunday					
7	8/20	کرامت اللہ	12/30	حکمان	8/15	حکمان	12/30
8	8/20	کرامت اللہ	1/30	حکمان	8/20	حکمان	1/30
9	8/20	کرامت اللہ	1/30	حکمان	8/20	حکمان	1/30
10	8/20	کرامت اللہ	1/30	حکمان	8/15	حکمان	1/30
11	8/15	کرامت اللہ	11/30	حکمان	8/20	حکمان	11/30
12	8/15	کرامت اللہ	1/35	حکمان	8/15	حکمان	1/35
13		Sunday					
14	8/30	کرامت اللہ	1/35	حکمان	8/20	حکمان	1/35
15	8/15	کرامت اللہ	1/35	حکمان	8/20	حکمان	1/35
16	8/10	کرامت اللہ	1/35	حکمان	8/15	حکمان	1/35
17	8/15	کرامت اللہ	1/35	حکمان	8/20	حکمان	1/35
18	8/15	کرامت اللہ	11/35	حکمان	8/15	حکمان	11/35
19	8/15	کرامت اللہ	1/35	حکمان	8/20	حکمان	1/35
20		Sunday					
21	8/40	کرامت اللہ	1/25	حکمان	8/15	حکمان	1/35
22	8/15	کرامت اللہ	1/35	حکمان	8/20	حکمان	1/35
23	8/15	کرامت اللہ	1/35	حکمان	8/20	حکمان	1/35
24		Training					
25	8/15	کرامت اللہ	12/35	حکمان	8/20	حکمان	12/35
26	8/15	کرامت اللہ	1/30	حکمان	8/20	حکمان	1/30
27		Sunday					
28	8/50	کرامت اللہ	1/30	حکمان	8/15	حکمان	1/30
29	8/15	کرامت اللہ	1/30	حکمان	8/20	حکمان	1/30
30	8/10	کرامت اللہ	1/30	حکمان	8/15	حکمان	1/30
31		Drama Training		8/20	حکمان	1/30	حکمان

attested  
  
 TAHIR AHMAD KHAN  
 Assistant Distt. Officer  
 (M) Prg: Larki Muzwal

قسم رخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
اتفاقیہ												
استحقاقی												
بیماری												
میزان												

دستخط ہیڈ ماسٹر





25

# رجسٹر حاضری مدرسین

2019ء

بابت ماہ نومبر

نام	کریم اللہ خان	حکیم ولی
عہدہ	PSHT	PST

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1	8/20	کریم اللہ	11/50	کریم اللہ	8/15	11/50	کریم اللہ	11/50	کریم اللہ	8/15	11/50	کریم اللہ
2	8/15	کریم اللہ	11/30	کریم اللہ	8/15	11/30	کریم اللہ	11/30	کریم اللہ	8/15	11/30	کریم اللہ
3												
4	8/20	کریم اللہ	11/30	کریم اللہ	8/20	11/30	کریم اللہ	11/30	کریم اللہ	8/20	11/30	کریم اللہ
5	8/20	کریم اللہ	11/30	کریم اللہ	8/20	11/30	کریم اللہ	11/30	کریم اللہ	8/20	11/30	کریم اللہ
6	8/20	کریم اللہ	11/35	کریم اللہ	8/15	11/35	کریم اللہ	11/35	کریم اللہ	8/15	11/35	کریم اللہ
7	8/20	کریم اللہ	11/35	کریم اللہ	8/20	11/35	کریم اللہ	11/35	کریم اللہ	8/20	11/35	کریم اللہ
8	8/15	کریم اللہ	11/30	کریم اللہ	8/15	11/30	کریم اللہ	11/30	کریم اللہ	8/15	11/30	کریم اللہ
9	8/20	کریم اللہ	11/30	کریم اللہ	8/15	11/30	کریم اللہ	11/30	کریم اللہ	8/15	11/30	کریم اللہ
10												
11	8/20	کریم اللہ	11/30	کریم اللہ	8/20	11/30	کریم اللہ	11/30	کریم اللہ	8/20	11/30	کریم اللہ
12	8/20	کریم اللہ	11/30	کریم اللہ	8/15	11/30	کریم اللہ	11/30	کریم اللہ	8/15	11/30	کریم اللہ
13	8/15	کریم اللہ	11/30	کریم اللہ	8/20	11/30	کریم اللہ	11/30	کریم اللہ	8/20	11/30	کریم اللہ
14												
15	8/20	کریم اللہ	11/50	کریم اللہ	8/20	11/50	کریم اللہ	11/50	کریم اللہ	8/20	11/50	کریم اللہ
16												
17												
18												
19	14/11/19	کریم اللہ	11/35	کریم اللہ	8/15	11/35	کریم اللہ	11/35	کریم اللہ	8/15	11/35	کریم اللہ
20												
21												
22												
23												
24												
25												
26												
27												
28												
29												
30												
31												

Almad ASD 9004  
12/11/19  
attested  
Almad

TAHIR AHMAD KHAN  
Assistant Distr. Officer  
(M. Prvt. Lakkī Marwat)

HEAD TEACHER  
G.P.S. Lakki Marwat  
Lakki Marwat

26

رجسٹر حاضری مدرسین

2020ء

بابت ماہ اگست

GPS نذیر والی

نام	حکیمان ولی	لطیف خان
عہدہ	PST (NTS)	PST (FTS)

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1												
2												
3												
4												
5												
6	7:30	12:00	7:45	12:00	7:45	12:00	7:45	12:00	7:45	12:00	7:45	12:00
7	7:30	12:00	7:40	12:00	7:40	12:00	7:40	12:00	7:40	12:00	7:40	12:00
8	7:30	12:00	7:25	12:00	7:25	12:00	7:25	12:00	7:25	12:00	7:25	12:00
9												
10	7:15	12:00	8:00	12:00	8:00	12:00	8:00	12:00	8:00	12:00	8:00	12:00
11	7:30	12:00	7:45	12:00	7:45	12:00	7:45	12:00	7:45	12:00	7:45	12:00
12	7:30	12:00	7:45	12:00	7:45	12:00	7:45	12:00	7:45	12:00	7:45	12:00
13	7:30	12:00	7:45	12:00	7:45	12:00	7:45	12:00	7:45	12:00	7:45	12:00
14												
15	7:30	12:00	7:40	12:00	7:40	12:00	7:40	12:00	7:40	12:00	7:40	12:00
16												
17	7:30	12:00	7:40	12:00	7:40	12:00	7:40	12:00	7:40	12:00	7:40	12:00
18	7:30	12:00	7:30	12:00	7:30	12:00	7:30	12:00	7:30	12:00	7:30	12:00
19	7:30	12:00	7:40	12:00	7:40	12:00	7:40	12:00	7:40	12:00	7:40	12:00
20	7:15	12:00	7:35	12:00	7:35	12:00	7:35	12:00	7:35	12:00	7:35	12:00
21	7:35	12:00	7:40	12:00	7:40	12:00	7:40	12:00	7:40	12:00	7:40	12:00
22	7:30	12:00	7:35	12:00	7:35	12:00	7:35	12:00	7:35	12:00	7:35	12:00
23												
24	7:30	12:00	7:30	12:00	7:30	12:00	7:30	12:00	7:30	12:00	7:30	12:00
25	7:40	12:00	7:45	12:00	7:45	12:00	7:45	12:00	7:45	12:00	7:45	12:00
26	7:30	12:00	7:40	12:00	7:40	12:00	7:40	12:00	7:40	12:00	7:40	12:00
27	7:30	12:00	7:35	12:00	7:35	12:00	7:35	12:00	7:35	12:00	7:35	12:00
28	7:30	12:00	7:40	12:00	7:40	12:00	7:40	12:00	7:40	12:00	7:40	12:00
29												
30												
31	7:30	12:00	7:30	12:00	7:30	12:00	7:30	12:00	7:30	12:00	7:30	12:00

Handwritten notes in Urdu, including names like 'لطیف خان' and 'حکیمان ولی', and dates like '25-08-2020'. There are also some illegible scribbles.

TAHIR AHMAD KHAN  
Assistant Teacher

Handwritten signature 'Ahmad' and 'AST'.

25-08-2020

قسم رخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
اشفاق	-	-	-	-	-	-	-	-	-
اشفاق	-	-	-	-	-	-	-	-	-
بیاری	-	-	-	-	-	-	-	-	-
میزان	-	-	-	-	-	-	-	-	-

HEAD TEACHER  
GPS Nazir Walai  
Lakki Mankari

# رجسٹر حاضری مدرسیں

27

20

بابت ماہ

نام	
عہدہ	

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1															
2															
3															
4															
5															
6															
7															
8															
9															
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27															
28															
29															
30															
31															

GPS Nazim walai

Dtd: 25/08/2020

The teachers were present

The New Chowkidar has not taken charge yet.

In the next appointment it is expected that

New Chowkidar will be appointed.

TAHIR AHMAD KHAN  
Assistant Dist. Officer

The teachers are directed

to ensure their presence in the school well on time.

25/08/2020

Almad  
HS/DO

قسم رخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
اتفاقہ												
استحقاق												
بیماری												
میزان												

دستخط ہیڈ ماسٹر

28

# رجسٹر حاضری مدرسین

2020ء

بابت ماہ ستمبر

GPS نئی روٹی

نظمیہ سکول

نام

PST (FTS)

PST (NTS)

عہدہ

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1	7:12:00	دستخط	رواگی	7:30	دستخط	رواگی	12:30	دستخط	رواگی			
2	7:13:00	دستخط	رواگی	7:35	دستخط	رواگی	12:30	دستخط	رواگی			
3	7:13:00	دستخط	رواگی	7:30	دستخط	رواگی	12:30	دستخط	رواگی			
4	7:14:00	دستخط	رواگی	7:35	دستخط	رواگی	12:30	دستخط	رواگی			
5	7:13:00	دستخط	رواگی	7:30	دستخط	رواگی	12:30	دستخط	رواگی			
6												
7	7:40	دستخط	رواگی	7:35	دستخط	رواگی	12:30	دستخط	رواگی			
8	7:30	دستخط	رواگی	7:35	دستخط	رواگی	12:30	دستخط	رواگی			
9	7:30	دستخط	رواگی	7:30	دستخط	رواگی	12:30	دستخط	رواگی			
10	7:30	دستخط	رواگی	7:40	دستخط	رواگی	12:30	دستخط	رواگی			
11	7:15	دستخط	رواگی	7:35	دستخط	رواگی	11:00	دستخط	رواگی			
12				7:30	دستخط	رواگی	12:00	دستخط	رواگی			
13												
14	7:13:00	دستخط	رواگی	7:35	دستخط	رواگی	12:30	دستخط	رواگی			
15	7:30	دستخط	رواگی	7:30	دستخط	رواگی	12:30	دستخط	رواگی			
16	7:30	دستخط	رواگی	7:30	دستخط	رواگی	12:30	دستخط	رواگی			
17	7:15	دستخط	رواگی	7:30	دستخط	رواگی	12:30	دستخط	رواگی			
18	7:35	دستخط	رواگی	7:30	دستخط	رواگی	12:10	دستخط	رواگی			
19	7:30	دستخط	رواگی	7:30	دستخط	رواگی	12:30	دستخط	رواگی			
20												
21	7:35	دستخط	رواگی	7:30	دستخط	رواگی	12:30	دستخط	رواگی			
22	7:30	دستخط	رواگی	7:30	دستخط	رواگی	12:30	دستخط	رواگی			
23	7:30	دستخط	رواگی	7:30	دستخط	رواگی	12:30	دستخط	رواگی			
24	7:30	دستخط	رواگی	7:30	دستخط	رواگی	12:30	دستخط	رواگی			
25	7:30	دستخط	رواگی	7:30	دستخط	رواگی	12:30	دستخط	رواگی			
26												
27												
28												
29												
30												
31												

attested

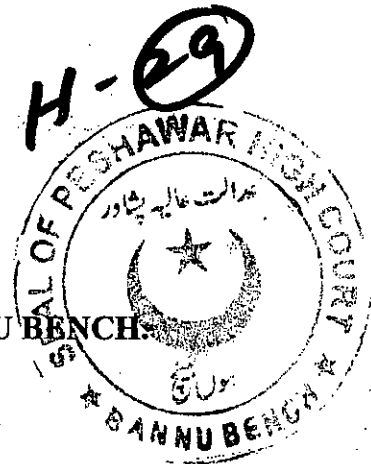
Tahir Ahmad Khan  
Assistant Director

قسم رخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
اتفاقية												
استحقاقی												
بیاری												
میزان												

دستخط ہیڈ ماسٹر

شیخ شیشری شورہ 8 اردو بازار لاہور فون: 042-37226599

**JUDGMENT SHEET**  
**IN THE PESHAWAR HIGH COURT, BANNU BENCH**  
**(Judicial Department)**



W.P No.921-B/2020.

Hukman Wali

Vs

Govt: of KPK etc.

**JUDGMENT**

Date of hearing \_\_\_\_\_ 12.10.2020.

Petitioner( s) by: *Mr. Inam Ullah Khan Marwat Advocate.*

Respondent(s) by: (In motion).

MUSARRAT HILALI, J.--- Through this constitutional petition filed under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, the petitioner seeks the following relief:-

*"It is, therefore, most humbly prayed that on acceptance of the instant writ petition this Hon'ble Court may graciously be pleased to issue an appropriate writ by directing the respondents to release the entire salaries/ pay to the petitioner in accordance with law.*

*Any further better relief deemed just and equitable in the circumstances of the case may also kindly be granted."*

**ATTESTED**  
 EXAMINER  
 Peshawar High Court  
 Bannu Bench

2. Brief facts of the case are that on 15.01.2019

petitioner was appointed as PST by the respondent No.2. He

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took the charge of the said post on 16.01.2019 at GPS Nazir Wali Lakki Marwat. Due to severe enmity in the village near the adjacent GPS Nazir Wali/ place of posting the petitioner could not continue his service in the said school and submitted an application to respondent No.2 for adjustment/transfer in some other school which was not accorded. The petitioner again started teaching in the said school on 13.5.2019 after the lapse of three months and continued till date and moved an application to the respondent No.2 for release of his salary but the same was not allowed and the petitioner was served with final show cause notice by the respondent No.2. He was also served with another show cause notice for one day salary deduction bearing NO.1104 dated 08.6.2019. The petitioner again submitted an application for releasing of his pay which was duly recommended by the ADEO, but in vain. Hence the instant writ petition.

3. Arguments heard, record perused.

4. The petitioner being civil servant has filed the

**ATTESTED**  
EXAMINER  
Peshawar High Court  
Bannu Bench

(31)

instant writ petition for issuing directions to the respondents to release the salary/pay to the petitioner which relates to terms and condition of service. The jurisdiction of this Court is explicitly barred under Article 212 of the Constitution in service matters and the proper forum available for redressal of grievance of the petitioner would be the service Tribunal. Thus this petition being not maintainable stands dismissed in

*LIMINE.*

*Sd/ Justice Ms. Musarrat Hilali, J*  
*Sd/ Mr. Justice Sahibzada Asadullah, J*

Announced.  
12.10.2020.

CERTIFIED TO BE TRUE COPY

*[Signature]*  
Examiner  
Peshawar High Court Bannu Bench  
Authorised Under Article 87 of  
The Qanun-e-Shahadat Ordinance 1984

Ihsan (D.B) Hon'ble Justice Musarrat Hilali and Hon'ble Justice Sahibzada Asadullah

SCANNED

*Khase*  
14/10/2020

To,

The Director,  
(E&SE) Department,  
Khyber Pakhtunkhwa, Peshawar.

I - (32)

**SUBJECT: DEPARTMENTAL APPEAL FOR ADJUSTMENT AGAINST THE POST OF PST BPS-12 AND FOR THE REALSE OF SALARIES WITH EFFECT FROM THE DATE OF FIRST APPOINTMENT i.e. 15.01.2019 TILL DATE.**

**RESPECTED SIR,**

*Brief facts of the case are as under:-*

1. That the appellant was appointed as Primary Shool Teacher (BPS-12) vide order dated 15-01-2019 and after appointment the appellant took over the charge of the said post at GPS Nazar Wali District Lakki Marwat and started performing his duty quite efficiently and upto the entire satisfaction of his superiors.
2. That unfortunately during service the appellant got an accident while riding Motor Cycle and got severe injuries due to which the appellant remained under treatment at the hospital. That due to such injuries the appellant was unable to perform his duty.
3. That after recovery from the said injuries the appellant re-join his duty with full of his devotion and honesty and with all zeal and zest.
4. That it is pertinent to mention here that family of the appellant was involved in serious enmity and the enemies of the appellant were residing in the nearby area of the duty station of appellant. That due to such reason the appellant moved an application alongwith documentary proofs (FIR's) before the competent authority for his transfer from GPS Nazar Wali, Lakki Marwat to GPS Syed Azam Baragi. **Copies of the FIR's & application are attached.**
5. That the authority concerned despite of knowing the fact refused the said application for transfer of the appellant but the appellant remained in duty at the concerned station despite of life threats. That it is also pertinent to mention here that the appellant was regularly performing his duty at the concerned station but the salary of the appellant had not been released by the authority concerned. **Copies of the duty certificates are attached.**
6. That the appellant time and again requested the authorities through written and verbal requests to release the monthly salaries of the appellant from the date of 1<sup>st</sup> appointment i.e. 15.01.2019 but in vain. That appellant feeling aggrieved from the inaction of the authorities by not releasing the monthly



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salaries filed writ petition No. 921-B/2020 before the Peshawar High Court, Bannu Bench but the same was disposed of with the directions to approach the proper forum i.e. Service Tribunal vide judgment dated 12.10.2020. **Copy of the judgment is attached.**

7. That then after the appellant once again approached the departmental authority and made a request for release of his salary but the authorities had not been given any response on the same and finally due to the ill response of the authority concerned the appellant remain absent for sometime from his duty. That later on the appellant submitted several applications for his adjustment against his post and release of his salaries from the date of 1<sup>st</sup> appointment i.e. 15.01.2019 till date but the authorities are not willing to do so.
8. That the appellant feeling aggrieved from the inaction of the authority concerned by not allowing the appellant for joining of his duty and as such not releasing the monthly salaries of the appellant from the date of 1<sup>st</sup> appointment i.e. 15.01.2019 till date preferred the instant departmental appeal before your good self on the following grounds.

**GROUND:**

- A- That the inaction of the authority concerned by not allowing the appellant for rejoining of his duty and as such not releasing monthly salaries of the appellant is against the law, facts, norms of natural justice and materials on the record, hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the authority concerned in accordance with law and rules on the subject noted above and as such the respondents violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
- C- That the authority concerned acted in arbitrary and malafide manner by not releasing the monthly salaries of the appellant w.e.f. the date of 1<sup>st</sup> appointment till date and as such not allowing the appellant to re-join his duty.
- D- That the authority concerned violated the principle of natural justice by withholding salaries of the appellant without any lawful justification.
- E- That not releasing monthly salaries of the appellant is violative of Article-11 of the Constitution of Islamic Republic of Pakistan, 1973.

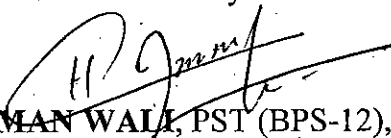
M. J.

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It is, therefore, most humbly prayed that on acceptance of this departmental appeal the authority concerned i.e. DEO (M) Lakki Marwat may very kindly be directed to adjust the appellant against the post of PST (BPS-12) and release the monthly salaries of the appellant w.e.f 15.01.2019 to till date. Any other relief which your good self deems fit that may also be awarded in favor of the appellant.

Dated: 08.09.2022.

Your's sincerely

  
HUKMAN WALI, PST (BPS-12),  
GPS Nazir Walai, Lakki Marwat



**VAKALATNAMA**

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

\_\_\_\_\_ OF 2022

Hukman Wali

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

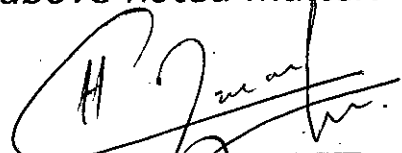
Education Deptt.

(RESPONDENT)  
(DEFENDANT)

I/We Hukman Wali

Do hereby appoint and constitute **MIR ZAMAN SAFI, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. \_\_\_\_\_/\_\_\_\_\_/2022



CLIENT



**ACCEPTED**

**MIR ZAMAN SAFI**  
**ADVOCATE**

OFFICE:

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