

Appeal No. 11010/2020  
M. Erbal vs Govt

15.01.2021

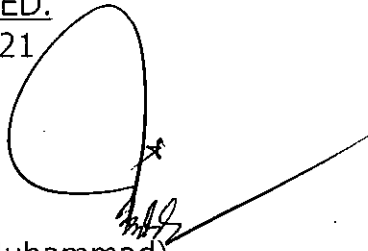
Appellant present through counsel.

Riaz Khan Paindakheil learned Assistant Advocate General alongwith Wahid Gul ADEO for official respondents No.1 to 3 present. Counsel for private respondent No.4 present.

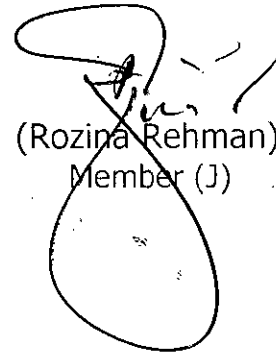
Vide detailed judgment of today of this Tribunal placed on file of service appeal No.11009/2020 titled Muhammad Zada Vs. Education Department, instant service appeal is accepted and the impugned notification in respect of posting transfer of the appellant, stands set aside. With no order as to costs. File be consigned to the record room.

ANNOUNCED.

15.01.2021



(Mian Muhammad)  
Member (E)




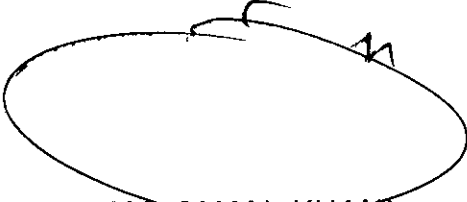
(Rozina Rehman)  
Member (J)

22.12.2020

Mr. Noor Muhammad Khattak, Advocate, for appellant is present. Mr. Riaz Ahmad Paindakheil, Assistant Advocate General, on behalf of official respondents No. 1 to 3, is also present..

Learned counsel representing appellant submitted that he has not prepared the brief and requested for adjournment. The learned Assistant Advocate General stressed to address arguments to the extent as to whether status-quo has to remain in the field or else has to be vacated. Learned counsel for appellant submitted that he has not opened the file yet and cannot address arguments and again requested for adjournment. The case is adjourned to 12.01.2021 on which to come up for arguments before D.B. Time sought for submission of rejoinder, time allowed. Appellant is directed to submit rejoinder. The operation of impugned order shall remain suspended till the date fixed if not acted upon already.

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

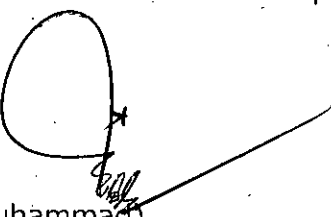
  
(MUHAMMAD JAMAL KHAN)  
MEMBER (JUDICIAL)

12.01.2021

Appellant present through counsel.

Riaz Khan Paindakheil learned Assistant Advocate General alongwith Ahmad Hussain Litigation Officer and Wahid Gul ADEO for official respondents No.1 to 3 present. Counsel for private respondents No.4 present.

Arguments heard. To come up for order on 15.01.2021 before D.B.

  
(Mian Muhammad)  
Member (E)

  
(Rezina Rehman)  
Member (J)

19.11.2020

Junior to counsel for the appellant and Addl; AG along with Abdul Wahid for official respondents present.

Representative of official respondents No.1 to 3 submitted written reply/comments. The appeal is assigned to D.B for arguments. Appellant may submit rejoinder within a fortnight. If, so advised. In the meanwhile, the operation of the impugned order, to the extent of appellant, shall remain suspended if not acted upon

  
Chairman

03.12.2020

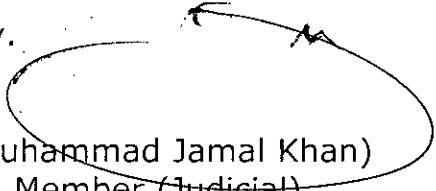
Due to COVID-19, the case is adjourned to 22.12.2020 for the same as before.

  
Reader

19.10.2020

Appellant is present in person. Mr. Kabirullah Khattak, Additional Advocate General alongwith Mr. Ahmad Hussain, Litigation Officer, on behalf of respondent No, 3, are also present.

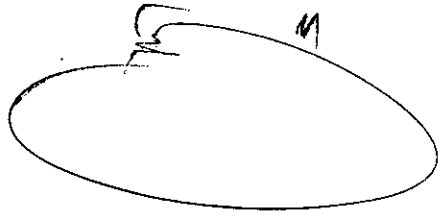
Neither private respondent No. 4 is present nor written reply on his behalf is submitted, therefore, he is proceeded ex-parte. Representative of official respondent No. 3 seeks time to furnish written reply/comments while No one is present on behalf of official respondents No. 1 & 2, therefore, notices be issued to them for submission of written reply/comments. Adjourned to 09.11.2020 on which to come up for written reply/comments on behalf of official respondents before S.B. In the meanwhile, the operation of impugned order, to the extent of appellant, shall remain suspended if not acted upon already.

  
(Muhammad Jamal Khan)  
Member (Judicial)

09.11.2020

Appellant is present in person. Mr. Kabirullah Khattak, Additional Advocate General on behalf of official respondents No. 1 to 3 is also present.

Written reply on behalf of respondents not submitted. Learned Additional AG requests for time to contact the respondents and furnish written reply/comments on the next date of hearing. Adjourned to 19.11.2020 on which date file to come up for written reply/comments on behalf of official respondents before S.B. In the meanwhile, the operation of impugned order, to the extent of appellant, shall remain suspended if not acted upon already.

  
(Muhammad Jamal Khan)  
Member (Judicial)

01.10.2020

Counsel for the appellant present.

Contends that the impugned transfer order of appellant, dated 11.08.2020, was withdrawn after the submission of departmental appeal. It was done through office order dated 14.09.2020. However, on 16.09.2020 the order dated 14.09.2020 was withdrawn from the date of issuance. In the circumstances of the case valuable rights accrued in favour of appellant upon issuance of office order dated 14.09.2020. On the other hand, the office order dated 16.09.2020 was issued without any notice to the appellant. It is also contended that the original impugned order dated 11.08.2020 was politically motivated. In that regard a note by a Member of National Assembly of Pakistan was referred to wherein recommendations for certain transfers/postings was made.

In view of the available record and arguments of learned counsel, 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 19.10.2020 before S.B.

Alongwith the appeal, there is an application for suspension of operation of the impugned orders dated 11.08.2020 and 16.09.2020. Notice of the application be also given to the respondents for the date fixed. In the meanwhile, the operation of impugned order, to the extent of appellant, shall remain suspended if not acted upon already.

Appellant Deposited  
Security & Process Fee

01/10/20

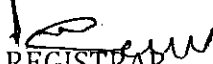

  
Chairman

Form- A

FORM OF ORDER SHEET

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

Case No.- 11010 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	22/09/2020	<p>The appeal of Mr. Muhammad Iqbal presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>01/10/20</u></p> <p style="text-align: right;"> CHAIRMAN</p>

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

APPEAL NO. 11010 /2020

**MUHAMMAD IQBAL**

**VS**

**EDUCATION DEPTT:**

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6	Policy	<b>E</b>	19- 21.
7	Departmental appeal	<b>F</b>	22.
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**APPELLANT**

**THROUGH:**

  
**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**

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

APPEAL NO. 110/0/2020

Pakhtunkhwa  
KHYBER PAKHTUNKHWA  
10497  
Diary  
Dated 22-9-2020

Mr. Muhammad Iqbal, Management Cadre, Presently posted as ADEO P&D (F), O/O DEO (F), Dir Upper Under transfer/posted as ASDEO Circle Barawal, Dir Upper ..... **APPELLANT**

**VERSUS**

- 1- The Government of Khyber Pakhtunkhwa through Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officers Male & Female, District Dir Upper.
- 4- Mr. Muhammad Riaz, SST (T.C) Adhoc, GHS Molavi under transfer/posted as ADEO (F) o/o DEO (F), Dir upper.

..... **RESPONDENTS**

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED TRANSFER ORDERS DATED 11.8.2020 & 16.9.2020 WHEREBY THE HAS BEEN TRANSFERRED ON THE BASIS OF POLITICAL INTERVENTION AGAINST TEACHING CADRE POST AND AGAINST THE APPELLATE ORDER DATED 16.9.2020 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED ON NO GOOD GROUNDS**

**PRAYER:** That on acceptance of this appeal the impugned orders dated 11.8.2020, 16.9.2020 and appellate order dated 16.9.2020 may very kindly be set aside and the respondents may kindly be directed not to transfer the appellant from the post of Assistant District Education Officer (F) O/O the District Education Officer (F), Dir Upper. Any other remedy which this august Tribunal deems fit that may also be awarded in favour of the appellant.

**R/SHEWETH:**

**ON FACTS:**

- 1- That appellant is the employee of the respondent Department and is serving as Assistant District Education Officer (F) in the office of District Education Officer (F), District Dir upper quite efficiently and up to the entire satisfaction of his superiors.
- 2- That astonishingly through political interference the appellant was transferred vide impugned Notification and order dated

Filed to-day

Registrar

22/9/2020



11.8.2020. That it is very pertinent to mention that the private respondent who has been transferred vice the appellant is belonging to teaching cadre but inspite of that the respondents issued the impugned notification and order dated 11.8.2020. Copies of the MNA letter, impugned notification and order are attached as annexure ..... **A, B & C.**

- 3- That it is also very pertinent to mention that the private respondent has recently been appointed on adhoc and school based policy and as such under the transfer posting policy they are non transferable employees of the respondent Department but inspite of that the respondents posted them against the management cadre post.
- 4- That according to the recent judgment of the Peshawar High Court passed in w.p No. 3737/2019 Title Nisar Ahmad & others VS Govt of KPK & Others dated 22.10.2019 strongly deprecated the practice of posting of teaching cadre against the post of management cadre but inspite that the respondents issued the impugned Notification and order dated 11.8.2020. Copy of the judgment is attached as annexure ..... **D.**
- 5- That the impugned Notification and order dated 11.8.2020 are violative of clause I, II, III & IV of the transfer/posting policy of the provincial Government. Copy of the policy is attached as annexure ..... **E.**
- 6- That appellant feeling aggrieved from the impugned Notification and order dated 11-08-2020 submitted Departmental appeal before the appellate authority and where after filed Writ petition before the Peshawar High Court, Darul Qaza Bench at Swat and the said writ petition was disposed of with the direction to decide the Departmental appeal of the appellant one way or the other vide judgment dated 1.9.2020. Copies of the Departmental appeal and judgment are attached as annexure ..... **F and G.**
- 7- That in response the appellate authority accepted the Departmental appeal of the appellant and directed the respondent No.2 to cancel the impugned order dated 11.8.2020. That vide order dated 14.9.2020 the transfer order 11.8.2020 of the appellant was withdrawn by the respondent No.2 but astonishingly vide impugned appellate order dated 16.9.2020 the said cancellation order dated 14.9.2020 has been withdrawn and restored the original impugned transfer order dated 11.8.2020 by the respondent No.2. Copies of the cancellation order and appellate order are attached as annexure ..... **H, I and J.**

- 8-** That appellant feeling aggrieved and having no other remedy but to file the instant writ petition on the following grounds amongst the others.

**GROUND:**

- A-** That the impugned Notification and orders dated 11-08-2020, 16.9.2020 issued by the respondent No.2 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 respondent Department 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 impugned Notification and order dated 11-08-2020 are against the clauses I, II, III & IV of the transfer/posting policy of the provincial Government of Khyber Pakhtunkhwa.
- D-** That the impugned Notification and orders of even date 11-08-2020 and 16.9.2020 are also violative of the management cadre policy, therefore not tenable and liable to be set aside.
- E-** That it is pertinent to mention that the private respondents belongs to teaching cadre while the posts against they were posted are of management cadre but inspite of that the respondents posted the private respondents against the posts in question.
- F-** That the treatment meted out to the appellant is a clear violation of the Fundamental Rights of the appellant.
- G-** That the respondents acted in arbitrary and malafide manner by issuing the impugned Notification & orders dated 11-08-2020 and 16.9.2020 against the appellant.
- H-** That, the appellant has been discriminated by the respondents on the subject noted above and as such the respondents violated the Principle of Natural Justice.
- I-** That neither the impugned Notification & orders dated 11-08-2020 and 16.9.2020 have been issued in the public interest nor the same have been issued in exigencies of public service.
- J-** That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 17-9-2020

**APPELLANT**

**Muhammad Iqbal**

**THROUGH:**

**NOOR MOHAMMAD KHATTAK**

**KAMRAN KHAN**

**UMER FAROOQ**

**&**

**SHAHZULLAH YOUSAFZAI,**

**ADVOCATES**

**HIGH COURT PESHAWAR**

**BEFORE THE FEDERAL SERVICE TRIBUNAL, ISLAMABAD**

**APPEAL No. \_\_\_\_\_/2020**

**MUHAMMAD IQBAL**

**VS**

**GOVT: OF PAK:**

**APPLICATION FOR SUSPENSION OF OPERATION OF  
THE IMPUGNED ORDERS DATED 11.08.2020 &  
16.09.2020 TILL THE DISPOSAL OF THE ABOVE  
MENTIONED APPEAL**

**R/SHEWETH:**

- 1- That the above mentioned appeal along with this application has been filed by the appellant before this august Tribunal in which no date has been fixed so far.
- 2- That appellant filed the above mentioned appeal against the impugned orders dated 11.08.2020 & 16.09.2020 whereby the appellant has been transferred on the basis of Political Intervention against the Teaching cadre post.
- 3- That all the three ingredients necessary for the stay is in favor of the appellant.
- 4- That the impugned order dated 11.08.2020 & 16.09.2020 had been issued by the respondents in utter disregard of law and prevailing Rules.

It is therefore, most humbly prayed that on acceptance of this application the operation of the impugned orders dated 11.08.2020 & 16.09.2020 may very kindly be suspended till the disposal of the above mentioned service appeal.

Dated: 18/09/2020

**APPLICANT**

**MUHAMMAD IQBAL**

**THROUGH:**

**NOOR MOHAMMAD KHATTAK**

**&**

**MIR ZAMAN SAFI  
ADVOCATES**

Directorate of Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

O.P.S.S.

No. 5003/F.No 32/Vol-4/SST (M)/Transfer Cases

Dated Peshawar the 16/6/2020

DESPATCHER  
Director (E&SE)  
KPK Peshawar

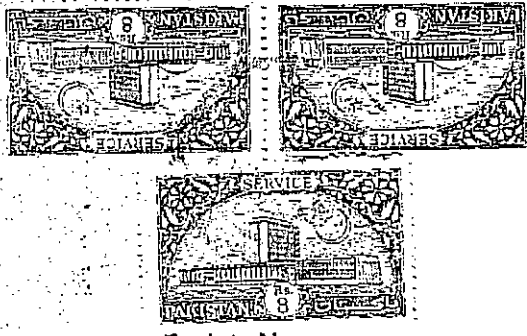
To

The District Education Officers,  
(M) Dir Upper.

Handwritten initials and a circled number '8'.

Subject:- PROPOSAL FOR TRANSFER/POSTING  
Memo:

I am directed to the subject cited above and to enclose herewith a proposal bearing No.Nil dated 14-05-2020, for your perusal and to ask you to submit your report and apprise this office which of them belongs to Management Cadre and which pertains to teaching cadre, so as to proceed further into the matter as per rules please.



Deputy Director (Estab)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

Endst: No. \_\_\_\_\_

Copy of the above is to:-

1. PA to Director (E&SE) Local Directorate.

Deputy Director (Estab)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

Handwritten initials 'ADBO'.

ATTESTED  
Handwritten signature  
MANUCALIB

ATTESTED  
Handwritten signature

C-9

**DIRECTORATE OF ELEMENTARY & SECONDARY  
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR**

**NOTIFICATION**

The Competent Authority is pleased to order transfer/posting of the following officers in their own pay scale, with immediate effect in the interest of public service.

#	Name & Designation	From	To (posted as)	Remarks
1	Mr. Abdul Aziz SST (T.C)	GHS Seri Sultan Khel	ADEO(Primary) at O/O DEO(M) Dir Upper	V#2
2	Muhammad Zado (T.C)	ADEO((Primary)) at O/O DEO(M) Dir Upper	GHS Katan	V#1 under Administrative basis
3	Mr. Muhammad Hanif SST	GMS Gamdat	ASDEO Circle Warl	Vice#5
4	Mr. Muhammad Iqbal (M.C)	ADEO (F) at O/O DEO(F) Dir Upper	ASDEO Circle Barval.	AVP under Administrative basis
5	Mr. Peer Muhammad (M.C)	ASDEO Circle Warl	ASDEO Circle sLarjam	AVP
6	Mr. Muhammad Riaz SST (T.C)	GHS Malavi	ADEO(F) at O/O DEO(F) Dir Upper	Vice#4
7	Mr. Naveer Ahmad SST (T.C)	GHS Warl	ADEO(Secondary) at O/O DEO(M) Dir Upper	Vice#8
8	Mr. Shahid Aziz SST (T.C)	ADEO(Secondary) at O/O DEO(M) Dir Upper	GHS Warl	Vice#7 under Administrative basis

**Note:**

1. Posting/Adjustment of Teaching Cadre Officers shall be considered as stop-gap arrangement till the arrival of Management Cadre officers.
2. The order of the above mentioned Teaching cadre officers will be effective subject to the condition that he will give an undertaking/affidavit on legal paper/stamp paper to DEO (M/F) Dir Upper to the effect, not to claim seniority of Management cadre.
3. Charge Report should be submitted to all concerned.
4. No TA/ DA is allowed.
5. The terms & conditions mentioned in their appointment order as teaching cadre will remain intact.

**DIRECTOR**

Elementary & Secondary Education  
Khyber Pakhtunkhwa

Encls: No. 29471-75 F.NO.32/Pol-4/ ADEOs (M) Transfers Dated the Peshawar 11/2 2020

Copy forwarded to the:

1. District Education Officer (M/F) Dir Upper.
2. District Accounts Officer Dir Upper.
3. Officers Concerned.
4. Master Copy.

**ATTESTED**

*[Signature]*  
11/6/2020

*[Signature]*  
Deputy Director (Estab)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

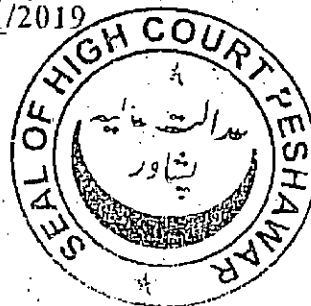
11/6/2020

**ATTESTED**

*[Signature]*

IN THE PESHAWAR HIGH COURT PESHAWAR

Writ Petition No. 3737P /2019



D-10

1. Nisar Muhammad  
DEO (M), Swabi.
2. Jehangir Khan,  
DEO (M), Charsadda.
3. Nawab Ali,  
DEO (M), Kolai Palas, Kohistan.
4. Qazi Tajamul  
DEO (M), Abbottabad.
5. Muhammad Tahir,  
DEO (M), Dir Upper.

Petitioners

Versus

1. The Govt. of Khyber Pakhtunkhwa  
through Chief Secretary,  
Civil Secretariat, Peshawar.
2. The Secretary,  
Govt. of Khyber Pakhtunkhwa  
Elementary & Secondary Education Department,  
Civil Secretariat, Peshawar.
3. Zahid Muhammad  
DEO (M) on Acting Charge  
Directorate of Elementary & Secondary Education,  
G.T. Road, Peshawar.
4. Muhammad Azam Khan,  
DEO (M) on Acting Charge  
Directorate of Elementary & Secondary Education,  
G.T. Road, Peshawar.
5. Sheraz Ahmad,  
DEO (M) on Acting Charge  
Directorate of Elementary & Secondary Education,  
G.T. Road, Peshawar.
6. Iqbal Khan  
DEO (M) on Acting Charge  
Directorate of Elementary & Secondary Education,  
G.T. Road, Peshawar.

ATTESTED  
BY [Signature]

ATTESTED  
EXAMINER  
Peshawar High Court

FILED TODAY  
Deputy Registrar  
10 JUL 2019

ATTESTED  
A

7. Muhammad Riaz,  
DEO (M) on Acting Charge  
Directorate of Elementary & Secondary Education,  
G.T. Road, Peshawar.

Respondents

(11)

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

Respectfully Sheweth,

Facts giving rise to the present writ petition are as under:-

1. That all the Petitioners are the Officers of the Elementary & Secondary Education Department, Govt. of Khyber Pakhtunkhwa (Teaching Cadre) serving in BPS-19 (regular basis), having longstanding service in Education Department. (Seniority List Annex:-A).
2. That as per the Notification dated 01.05.2009 (Annex:-B), the posts of Executive District Officers/Additional Directors (BPS-19) were/are to be filled in through initial recruitment at the ratio of 40% from open market and 60% from amongst the teaching cadre having the qualification as mentioned in Column No.3.
3. That since the rules affected the interests of the Teaching Cadre in matters of posting to subject posts accordingly the Teaching Cadre officers filed Writ Petition No.2937/2009 which was disposed of vide order dated 18.11.2009 (Annex:-C) with certain directions which order was called in question by the Officers of the Teaching Cadre before the Apex Court in C.P. No.734 of 2010 but meanwhile vide Notification dated 07.04.2012 (Annex:-D) the Government amended the Notification dated 04.05.2009 ibid and thus made the Teaching Cadre Officers transferable to the Management Cadre. Accordingly, C.P. Pending before the august Supreme Court of Pakistan stood infructuous and disposed of accordingly vide order dated 09.04.2012 (Annex:-E).
4. That the Rules/Notification ibid, were amended vide Notification dated 03.07.2018 (Annex:-F), relevant portion of the amendment is as under:-

ATTESTED  
BY: AMBROSIO

ATTESTED  
EXAMINER  
Peshawar High Court

FILED TODAY

Deputy Registrar

10 JUL 2019

ATTESTED



Proposal Transfer/Posting

- 1) Shaukat Lodhan - Deputy DEO (M) Upper Dir
- 2) Abul Aziz - SST - ADEO (M) Primary Upper Dir
- 3) ~~Pir Muhammad - SDEO (M) Wari Circle~~  
SST GMS Gramdet to  
Muhammad Hanif - A SDEO (M) Wari Circle
- 4) Muhammad Iqbal -  
A DEO (F) & D to ASDEO Barawal
- 5) Muhammad Zada -  
ADEO (M) transfer to GHS Katan Upper Dir
- 6) Muhammad Riaz - SST GHS Mola  
ADEO (F) Dir Upper
- 7) Sardar Khan - ADEO (L) Latigation  
to GHS Mola (GMS Gramdet)

ATTESTED  
[Signature]

Suit # 412, Block-H, Parliament Lodges, Islamabad. Cell: 0813-8802230, 0343-8802230

SAHIBZADA SIRGHATULLAH  
Member National Assembly

1. Muhammad Iqbal

ATTESTED

[Signature]

1, Abdul Aziz SST GHS Ser Sultan Khel

to  
A DEO (M), primary Est. Div U,



2, Muhammad Hanif SST GHS Gramdat

to  
ASDEO wari

7

3, Feer Muhammad ASDEO wari,  
to

ASDEO Elitigation DEO (M), Div U (vacant)

Admir  
proceeds

Amir  
14/5/20

4, Muhammad Iqbal ADEO (F),

to ASDEO barawal.

5, Muhammed Riaz SST GHS Molavi to

ADEO (F), P & D Div U,

6, Naseer Ahmad SST GHS wari to

Secretary  
ADEO DEO Div U,

7, Hazrat Wahab (Assistant), SDEO (F), wari

to  
SDEO (F), Larjam.

8, Mahmood Khan Asst. DEO (F), to

SDEO (F), wari.

ATTESTED  
BY AG/0046

9, Muhammad Zade ADEO (M), Div U to

ATTESTED

4

S#	Nomenclature of the post	Minimum qualification for initial recruitment or by transfer	Age limit	Method of Recruitment
1	2	3	4	5
1.				
2.	District Education Officer/Additional Director (BPS-19) (M&F)			By promotion, on the basis of seniority-cum-fitness from amongst the Deputy District Education Officers and Deputy Directors (M&F) with at least seven years service in BPS-18 or 12 years service in BPS-17 and above and having the qualified mid career Management Course.  Provided if no suitable Officer is available for promotion then by transfer of BPS-19 Officer.

5. That all the Petitioners have been serving against the posts of Management Cadre ever since their posting and have been performing their functions as such with full dedication in efficient manner and during such period they have never given any cause of complaint to their high-ups rather their efforts have been commended and appreciated. (Notifications dated 18.04.2013, 31.12.2012 in respect of Petitioners No.1, 2&4 are Annex:-G).
6. That Respondents No.3-7 were appointed as Deputy District Education Officers/Deputy Director (BPS-18) vide Notification dated 15.04.2014 (Annex:-H) and vide Notification dated 27.05.2019 (Annex:-I) they were promoted to the posts of District Education Officers/Additional Directors (BPS-19) on Acting Charge basis on account of dearth in their length of service required for regular promotion to the subject posts.
7. That Petitioners are senior Officers having been posted to the subject posts being eligible, experienced under the Rules, however, in violation of the law and Rules, the junior-most Officers i.e. Respondents No.3-7 are going to be posted against the posts of Petitioners as is evident from the Notification dated 31.05.2019 (Annex:-J) showing their actualization of promotion to the posts occupied by Petitioners.
8. That actions of the Respondents by disturbing the Petitioners by posting ineligible, junior Officers are highly illegal, mala fide and therefore, Petitioners being aggrieved of the same, having no other adequate and efficacious remedy, file this constitutional petition inter-alia on the following grounds:-

**ATTESTED**  
EXAMINER  
Peshawar High Court

FILED TODAY

Deputy Registrar,

10 JUL 2019

**ATTESTED**

Grounds:

- A. That Respondents have not treated petitioner in accordance with law, rules and policy on subject and acted in violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973 and unlawfully decided to disturb the Petitioners through adjustment of Respondents No.3-7 which is unjust, unfair and hence not sustainable in the eye of law.
- B. That Petitioners are regular officers in BPS-19 and have been posted to the subject posts as per the Rules. In presence of Petitioners, the adjustment of Respondents No.3-7 against the posts occupied by Petitioners is in utter violation of the law, based on mala fide intention and hence not sustainable under the law.
- C. That Respondent No.3-7 are not only junior officers but are also not eligible for promotion to BPS-19 having insufficient length of service in BPS-18 under the Rules whereas on the other hand Petitioners are regular officers in BPS-19 and serving against the subject posts since long without any complaint whatsoever, therefore the displacement of Petitioners through unlawful adjustment of Respondents is highly illegal, against the Public Policy and thus not tenable under the law.
- D. That even the acting charge appointment of Respondent No.3-7 is unlawful and is violative of the provisions of Rules 9 Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989. Firstly, there is no post vacant against which Respondent No.3-7 could be promoted as the posts are lawfully occupied by Petitioners and secondly, Respondent No.3-7 are ineligible having no required length of service under the Rules. Thus the decision of Respondents to adjust them in places of Petitioners is arbitrary and thus not maintainable under the law.
- E. That Petitioners are senior officers of the same Department having rendered longstanding service in the Department to the entire satisfaction of the high-ups. They have performed on the subject posts for long and have got long experience in the field while Respondent No.3-7 have got no parallel position at the expense of Petitioners therefore their adjustment in

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Peshawar High Court

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places of Petitioners not legally a correct decision.

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For the aforesaid reasons, it is therefore, humbly prayed that on acceptance of this writ petition, this Hon'ble Court may graciously be pleased to declare the decision of the Respondents to dislodge Petitioners from the posts occupied by them by adjusting Respondents No.3-7 there-against as without lawful authority and hence of no legal effect and this august Court may further be pleased to direct the Respondents to act in the matter in accordance with law and not to disturb Petitioners by unlawful adjusting Respondents No.3-7 against the posts occupied by Petitioners being senior regular officers in BPS-19.

Any other relief as deemed appropriate in the circumstances of case not specifically asked for, may also be granted to petitioner.

Interim Relief

By way of interim relief, this Hon'ble Court may graciously be pleased to restrain the Respondent from unlawfully disturbing the Petitioners through illegal adjustment of junior and ineligible officers against the posts occupied by Petitioners till the final disposal of the instant writ petition.

Through

Petitioners

Khaled Rahmani  
Advocate,  
Supreme Court of Pakistan

Dated: 09/07/2019

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Peshawar High Court

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10 JUL 2019

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BY [Signature]

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[Signature]

CERTIFICATE

Certified on instruction that petitioner(s) has/have not previously moved this Hon'ble Court under Article 199 of the Constitution of the Islamic Republic of Pakistan, 1973 regarding present matter.

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*(Handwritten 'B')*

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Khaled Rahman  
Advocate, Peshawar

List of Books

1. The Constitution of the Islamic Republic of Pakistan, 1973.
2. Services Law.

NOTE

1. Three spare copies of the Writ Petition are enclosed in a separate file cover.
2. Memo of addresses is also attached.

*(Handwritten signature)*  
Khaled Rahman  
Advocate, Peshawar

ATTESTED  
*(Handwritten signature)*  
by Advocate

*(Handwritten signature)*

CERTIFIED TO BE TRUE COPY

EXAMINER  
Peshawar High Court, Peshawar  
Authorised Under Article 87 of  
The Qanun-e-Shahadat Order 1984

29 OCT 2019

FILED TODAY  
Dun *(Handwritten signature)*  
10 JUL 2019

ATTESTED  
*(Handwritten signature)*

(16)

**JUDGMENT SHEET**  
**PESHAWAR HIGH COURT, PESHAWAR**  
**(JUDICIAL DEPARTMENT)**

WP No. 3737-PI/2019

**JUDGMENT.**

Date of hearing: 22.10.2019

Petitioner: Nisar Ahmad (S/o) - Mr. Khalid Khan

Respondents: 1- Mr. Noor Muhammad Khan - District Officer  
2- Sp. Officer Qasim Ali Khan - D.O.

**WAQAR AHMAD SETH, CJ:** Petitioners, Nisar

Muhammad and others, through the instant Writ Petition, seek issuance of an appropriate writ declaring the decision of respondents to dislodge the petitioners from the posts occupied by them by adjusting respondents No. 3-7 thereagainst as without lawful authority and of no legal effect; hence, this Court may direct the respondents to act in the matter in accordance with law and not to disturb the petitioners by unlawful adjusting respondents No. 3-7 against the posts occupied by petitioners being senior regular officers in BPS-19.

2. In essence, grievance of the petitioners is that they are Officers of the Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa (Teaching

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EXAMINER  
Peshawar High Court

**ATTESTED**

Cadre) and serving against the posts of Management Cadre in BPS-19) since 2012-2013 while respondents No. 3 to 7 being juniors to them are going to be posted against the posts of petitioners as is evident from the Notification dated 31.05.2019; hence, the instant Writ Petition.



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3. Respondents No. 1 & 2 have filed their comments and opposed the writ of petitioners.

4. Arguments heard and record perused.

5. Admittedly, petitioners belong to Teaching Cadre and have been posted against the post of Management Cadre as stopgap arrangement due to shortage of officers in Management Cadre, however, after filing Writ Petition No. 4274-P/2016 before this Court by Management Cadre, the same was disposed of vide order dated 11.01.2018 with direction to the respondents to finalize the case for making provision in the Rules with regard to promotions in the Management Cadre within three months with further direction to rationalize posting/transfer against Management Cadre posts in light of relevant rules/policy. In compliance thereof, the respondents have framed service rules for Management

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EXAMINER  
Peshawar High Court

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Cadre and notified the same for promotion upto BPS-20 vide Notification dated 27.03.2019; hence, keeping in view the aforesaid Service Rules, the action of respondents for adjusting respondents No. 3 to 7 against the petitioners' post is in accordance with law and no writ can be issued in favour of petitioners.

6. Resultantly, the Writ Petition being without any merit is hereby dismissed.

ANNOUNCED.  
Dated: 22.10.2019

Chief Justice

Judge

=====

**CERTIFIED TO BE TRUE COPY**  
EXAMINED  
Sachwar High Court Sachwar  
Authorized by Article 167 of  
The Constitution of India Order 1053  
29 OCT 2019

No. 10257  
Date of Presentation of Application 23-10-19  
No of Pages 27  
Copying fee 36/-  
Total 36/-  
Date of Preparation of Copy 29-10-19  
Date of Delivery of copy 29-10-19  
Received By [Signature]

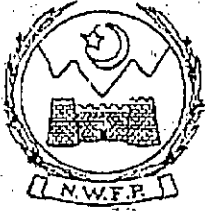
[Signature]

Hawab Shukh SCS (DB) Justice Waqar Ahmad Soth CJ & Justice Abdul Etakoor J

ATTESTED

[Signature]  
by Advocate

ATTESTED



GOVERNMENT OF NWFP  
ESTABLISHMENT & ADMINISTRATION  
DEPARTMENT  
(Regulation Wing)

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POSTING / TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT.

- i) All the posting/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants
- ii) All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posing/transfers of their choice and against the public interest.
- iii) All contract Government employees appointed against specific posts, can not be posted against any other post.
- iv) The normal tenure of posting shall be three years subject to the condition that for the officers/officials posted in unattractive areas the tenure shall be two years and for the hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.
- v) { }
- vi) While making postings/transfer from settled areas to FATA and vice-versa, specific approval of Governor, NWFP needs to be obtained  
<sup>2</sup>While making postings/transfers of officers/officials up to BS-17, from settled areas to FATA and vice-versa approval of the Chief Secretary NWFP needs to be obtained. Whereas, in case of posting/transfer of officers in BS-18 and above, from settled areas to FATA and vice versa, specific approval of the Governor NWFP shall be obtained.
- vi (a) All Officers/officials selected against Zone-I/FATA quota in the Provincial Services should compulsorily serve in FATA for atleast eighteen months in each grade. This should start from senior most scales/grades downwards in each scale/grade of each cadre.
- vii) Officers may be posted on executive/administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and DPOs/Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thaana) of his area/residence is situated.
- viii) No posting/transfers of the officer's/officials on detailment basis shall be made.
- ix) Regarding the posting of husband/wife, both in Provincial services, efforts where possible would be made to post such persons at one station subject to the public interest.
- x) All the posting/transferring authorities may facilitate the posting/transfer of the unmarried female government Servants at the station of the residence of their parents.

ATTACHED  
BY ADVOCATE

1 Para-1(v) regarding months of March and July for posting/transfer and authorities for relaxation of ban deleted vide letter No. SOR-VI (E&AD) 1-4/2008/Vol-VI, dated 3-6-2008. Consequently authorities competent under the NWFP Government Rules of Business, 1985, District Government Rules of Business 2001, Posting/Transfer Policy and other rules for the time being in force, allowed to make posting/transfer subject to observance of the policy and rules.  
2 Added vide Urdu circular letter No. SOR-VI(E&AD)1-4/2003, dated 21-09-2004

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- xi) Officers/officials except DCOs and DPOs/SPs who are due to retire within one year may be posted on their option on posts in the Districts of their domicile and be allowed to serve there till the retirement  
 DCOs and DPOs who are due to retire in the near future may also be posted in the District of their domicile subject to the condition that such posting would be against non-administrative posts of equivalent scales;
- xii) In terms of Rule-17(1) and (2) read with Schedule-III of the NWFP Government Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officer in column 2 thereof:

Outside the Secretariat		
1.	Officers of the all Pakistan Unified Group i.e. DMG, PSP including Provincial Police Officers in BPS-18 and above.	Chief Secretary in consultation with Establishment Department and Department concerned with the approval of the Chief Minister.
2.	Other officers in BPS-17 and above to be posted against scheduled posts, or posts normally held by the APUG, PCS(EG) and PCS(SG).	-do-
3.	Heads of Attached Departments and other Officers in B-19 & above in all the Departments.	-do-
In the Secretariat		
1.	Secretaries	Chief Secretary with the approval of the Chief Minister.
2.	Other Officers of and above the rank of Section Officers: a) Within the Same Department b) Within the Secretariat from one Department to another.	Secretary of the Department concerned. Chief secretary/Secretary. Establishment.
3.	Officials up to the rank of Superintendent: a) Within the same Department b) To and from an Attached Department c) Within the Secretariat from one Department to another	Secretary of the Department concerned. Secretary of the Dept in consultation with Head of Attached Department concerned. Secretary (Establishment)

ATTACHED  
 1/1/2009

- xiii) While considering posting/transfer proposals all the concerned authorities shall keep in mind the following:
- a) To ensure the posting of proper persons on proper posts, the Performance Evaluation Report/annual confidential reports, past and present record of service, performance on post held presently and in the past and general reputation with focus on the integrity of the concerned officers/officials be considered.
- b) Tenure on present post shall also be taken into consideration and the posting/transfers shall be in the best public interest.

<sup>1</sup> Added vide Urdu circular letter No: SOR-VI (E&AD)/1-4/2005, dated 9-9-2005.

ATTACHED  
 1/1/2009



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xiv) Government servants including District Govt. employees feeling aggrieved due to the orders of posting/transfer authorities may seek remedy from the next higher authority / the appointing authority as the case may be through an appeal to be submitted within seven days of the receipt of such orders. Such appeal shall be disposed of within fifteen days. The option of appeal against posting/ transfer orders could be exercised only in the following cases.

- i) Pre-mature posing/transfer or posting transfer in violation of the provisions of this policy.
- ii) Serious and grave personal (humanitarian) grounds.

2. To streamline the postings/transfers in the District Government and to remove any irritant/confusions in this regard the provision of Rule 25 of the North West Frontier Province District Government Rules of Business 2001 read with schedule - IV thereof is referred. As per schedule-IV the posting/transferring authorities for the officers/officials shown against each are as under:-

S. No.	Officers	Authority
1.	Posting of District Coordination Officer and Executive District Officer in a District.	Provincial Government.
2.	Posting of District Police Officer.	Provincial Government
3.	Other Officers in BPS-17 and above posted in the District.	Provincial Government
4.	Official in BPS-16 and below	Executive District Officer in consultation with District Coordination Officer.

3. As per Rule 25(2) of the Rules mentioned above the District Coordination Department shall consult the Government if it is proposed to:

- a) Transfer the holder of a tenure post before the completion of his tenure or extend the period of his tenure.
- b) Require an officer to hold charge of more than one post for a period exceeding two months.

4. I am further directed to request that the above noted policy may be strictly observed /implemented.

All concerned are requested to ensure that tenures of the concerned officers/officials are invariably mentioned in summaries submitted to the Competent Authorities for Posting/Transfer.

{Authority: Letter No: SOR-VI/E&AD/1-4/2003 dated 24-6-2003}.

It has been decided by the Provincial Government that posting/transfer orders of all the officers up to BS-19 except Heads of Attached Departments irrespective of grades will be notified by the concerned Administrative Departments with prior approval of the Competent Authority obtained on the Summary. The Notifications/orders should be issued as per specimen given below for guidance.

All posting/transfer orders of BS-20 and above and Heads of Attached Departments (HAD) shall be issued by the Establishment Department and the Administrative Departments shall send approved Summaries to E&A Department for issuance of Notifications.

**ATTESTED**

*[Handwritten signature]*

To  
The Honorable Secretary E& SED,  
Khyber Pakhtunkhwa Peshawar.

F-22

Subject: APPEAL FOR WITHDRAWAL OF POSTINGS/TRANSFERS ORDER IN R/O ADEOs/ASDEOs (M&F) OFFICES DISTRICT DIR UPPER.

- R/Sir
- 1- With great profound I would like to invite your kind attention to the postings/transfers of ADEOs/ASDEOs (M&F) Offices Dir Upper have been Issued vide office of Director E&SE Endst No: 29471-75/F: No: 32/Vol-4/ADEOs (M) Transfer Dated Peshawar the: 11/08/2020 (copy attached). In the instant order Serial No's 2,4 and 8 have been charged and transferred on administrative grounds; while before issuing orders, no personal hearing etc have been made neither I was informed about the procedures; that what kinds of charges leveled against us.
  - 2- If any charges are proved against me in any inquiry then why proper action has not been taken against the beneficiaries who have been appointed /promoted, which is yet not been initiated. As a matter of fact; Initial action is required against the beneficiaries and competent authority who are wholly responsible for such kinds of miss-use of powers or other negligence.
  - 3- Before issuing our transfer orders the director E&SED forwarded a letter to the District Education Officer (M) Dir Upper vide No:5003/F: No: 32/Vol-4/Dated 16/06/2020, seeking information about postings/transfers of ADEOs proper identification of teaching and management cadres officers along with proper proposal/recommendation duly signed by local MNA Dir Upper on specific letter pad (copy attached). The present situation indicate that proposal/recommendations submitted by local MNA is wholly implemented and eventually I have charged and transferred on administrative grounds; which is denoting that the order has been issued only on the political pressure of local MNA for ulterior motives.
  - 4- One Muhammad Riaz SST appointed through NTS on Sep, 2018 and still in a probation period and his appointment order has not yet been regularized, posted as ADEO(P&D) against me (MC) which is against policy.
  - 5- In view of the above quoted facts that my transfer order has been issued on political influences having no legal status which is against the service Rules and therefore we are humbly requesting to please withdraw the aforementioned transfer orders and Intact us on previous stations.  
Hoping that my request will be decided on merit according to the prescribed manners please

In view of the above quoted facts that my transfer orders have been issued on political influences having no legal status which is against the service Rules and therefore I am humbly requesting to please withdraw the aforementioned transfer orders and Intact me on previous station/ position.

I hope that my case will be decided on merit according to the prescribed manners please.

Thanks for yours kind anticipations.

Yours sincerely,

MUHAMMAD IQBAL, ASDEO Circle Barawal  
Ex-ADEO(P&D) Female Dir Upper.

13/8/2020

ATTENDED  
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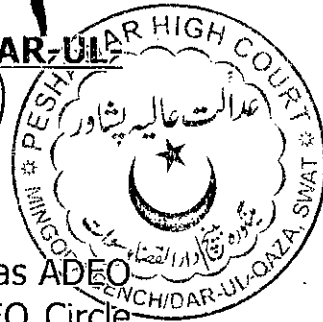
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BEFORE THE PESHAWAR HIGH COURT MINGORA BENCH DAR-UL-QAZA AT SWAT

QAZA AT SWAT

WRIT PETITION NO. 829-1/2020

4-23



- 1- Mr. Muhammad Iqbal, Management Cadre, Presently posted as ADEO (F), O/O DEO (F), Dir Upper Under transfer/posted as ASDEO Circle Barawal, Dir Upper. *R/o Katak P.O Wari.*
- 2- Mr. Peer Muhammad, Management Cadre, presently posted as ADEO Circle Wari under transfer/posted as ASDEO Circle Larjam. *Daskori Wari Dir Upper*
- 3- Mr. Muhammad Zada, (Teaching Cadre) presently posted as ADEO (P) at the o/o DEO (M), Dir Upper under transfer to GHS Katan, Dir Upper. *Bibyawat Dir Upper*
- 4- Mr. Shahid Aziz, Teaching cadre, presently posted as ADEO (M) o/o DEO (M) Dir Upper under transfer/not yet posted, Dir Upper. *Shaw Dir(U)*

PETITIONERS

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officers Male & Female, District Dir Upper.
- 4- Mr. Muhammad Riaz, SST (T.C), NTS adhoc school based GHS Molavi under transfer/posted as ADEO (F) o/o DEO (F), Dir upper. *Tangei, Tehsil Wari Dir(U)*
- 5- Mr. Muhammad Hanif, SST (T.C), GMS Gamdat, Dir Upper under transfer/posted as ASDEO circle Wari, Dir Upper. *Chapper P.O, Tehsil Wari Dir(U)*
- 6- Mr. Abdul Aziz, SST (T.C), NTS 2017 GHS Seri Sultan Khel, Dir Upper under transfer/posted as ADEO (P) o/o DEO (M), Dir Upper. *Seri Sultan Khel Dir(U)*
- 7- Mr. Hazrat Luqman, SST, IT NTS 2017 GHS Katan Bala under transfer/posted as ADEO (M) o/o DEO (M), upper Dir. *Dislower Tehsil Wari Dir(U)*

RESPONDENTS

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

R/SHEWETH:

ON FACTS:

ATTESTED

Examiner  
Peshawar High Court Bench  
Mingora Dar-ul-Qaza, Swat.

1- That petitioners are the bonafide resident of District Dir upper and belongs to respectable families. Copies of CNIC's are attached as annexure ..... A.

2- That lastly all the petitioners were posted against the management cadre posts mentioned above through different orders/notifications. That in response to the said Notifications/orders regarding their posting the petitioners submitted their arrival reports and started performing their duties quite efficiently and up to the entire satisfaction of their superiors. Copies of the posting orders/notifications of the petitioners are attached as annexure ..... B.

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20 AUG 2020

Additional Registrar

3-

That astonishingly through political interference all the petitioners have been transferred and posted against the teaching / management cadre posts vide impugned Notification and order dated 11.8.2020. That it is very pertinent to mention that all the private respondents who were transferred vice the petitioners are belonging to teaching cadre but inspite of that the respondents issued the impugned notification and order dated 11.8.2020. Copies of the MNA letter, impugned notification and order are attached as annexure ..... **C, D & E.**

4-

That it is also very pertinent to mention that all the private respondents have recently been appointed on adhoc and school based policy and as such under the transfer posting policy they are non transferable employees of the respondent Department but inspite of that the respondents posted them against the management cadre posts.

5-

That according to the recent judgment of the Peshawar High Court passed in W.P No. 3737-P/2019 Title Nisar Ahmad & others VS Govt of KPK & Others order and judgment dated:22-10-2019 strongly deprecated the practice of posting of teaching cadre against the post of management cadre but inspite that the respondents issued the impugned Notification and order dated 11.8.2020. Copy of the judgment is attached as annexure ..... **F.**

6-

That the impugned Notification and order dated 11.8.2020 are violative of clause I, II, III & IV of the transfer/posting policy of the provincial Government. Copy of the policy is attached as annexure ..... **G.**

7-

That petitioners feeling aggrieved from the impugned Notification and order dated 11-08-2020 submitted Departmental appeals before the appellate authority but of no avail though the appellate authority is legally bound in light of clause-xiv of the transfer/posting policy of the provincial Government to dispose of the Departmental appeals of the petitioners within fifteen days but inspite of that the appellate authority i.e. respondent No.1 is not willing to dispose of the Departmental appeals of the petitioners. Copies of the Departmental appeals are attached as annexure ..... **H.**

8-

That petitioners feeling aggrieved and having no other remedy but to file the instant writ petition on the following grounds amongst the others.

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20 AUG 2020

Additional Registrar

**ATTESTED**

Examiner  
Peshawar High Court Bench  
Mingora Dar-ul-Qaza, Swat.



**GROUND:**

25

**A-** That the impugned Notification and order dated 11-08-2020 issued by the respondent No.2 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 petitioners has not been treated by the respondent Department 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 impugned Notification and order dated 11-08-2020 are against the clauses I, II, III & IV of the transfer/posting policy of the provincial Government of Khyber Pakhtunkhwa.

**D-** That the impugned Notification and order of even date 11-08-2020 is also violative of the management cadre policy, therefore not tenable and liable to be set aside.

**E-** That it is pertinent to mention that the private respondents belongs to teaching cadre while the posts against they were posted are of management cadre but inspite of that the respondents posted the private respondents against the posts in question.

**F-** That the treatment meted out to the petitioners is a clear violation of the Fundamental Rights of the petitioner.

**G-** That the respondents acted in arbitrary and malafide manner by issuing the impugned Notification & order dated 11-08-2020 against the petitioners.

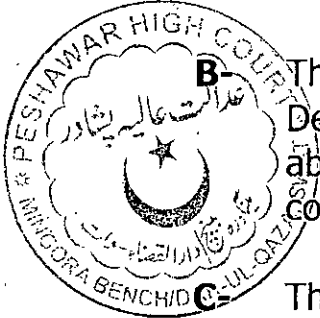
**H-** That according to Clause-XIV of the transfer/posting policy of the provincial Government the respondent No.1 is duty bound to dispose of the Departmental Appeal of the petitioners strictly within fifteen (15) days.

**I-** That, the petitioners has been discriminated by the respondents on the subject noted above and as such the respondents violated the Principle of Natural Justice.

**J-** That neither the impugned Notification & order dated 11-08-2020 have been issued in the public interest nor the same have been issued in exigencies of public service.

**K-** That the petitioners seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that on acceptance of this writ petition the inaction of the respondent No.1 by not



TESTED  
Examiner  
Peshawar High Court Bench  
Muzaffargarh, Swat.

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20 AUG 2020  
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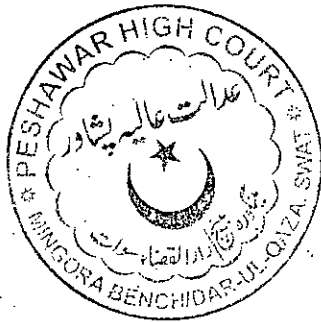


26  
deciding/dispose of the Departmental appeals of the petitioners in light clause-xiv of the transfer/posting policy may be declared as illegal, unconstitutional and in effective upon the rights of the petitioner. That the respondent No.1 may please be directed to disposed of the Departmental appeals of the petitioners in light of Clause-XIV of the transfer/posting Policy of the Provincial Government. Any other remedy which this august Court deems fit that may also be awarded in favor of the petitioner.

**INTERIM RELIEF:**

That in the mean while the operation of the impugned Notification and order dated 11-08-2020 may kindly be suspended till the disposal of the Departmental appeal of petitioners.

Dated: 18-8-2020




**PETITIONERS**

  
Muhammad Iqbal & 3 Others

**THROUGH:**

  
NOOR MOHAMMAD KHATTAK

  
KAMRAN KHAN

  
UMER FAROOQ

&   
SHAHZULLAH YOUSAFZAI,  
ADVOCATES  
HIGH COURT PESHAWAR

**VERIFICATION:**

It is verified that no other earlier writ petition was filed between the parties.

**FILED TODAY**

  
20 AUG 2020

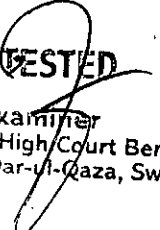
Additional Registrar

**LIST OF BOOKS:**

1. Constitution of Pakistan.
2. Services Laws Books.
3. Any other Case law as per need.

  
DEPONENT

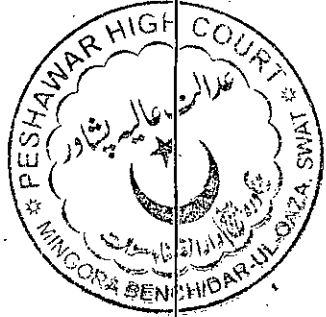
**ATTESTED**

  
Examiner  
Peshawar High Court Bench  
Mingora Dar-ul-Qaza, Swat.

**FORM OF ORDER SHEET**

27

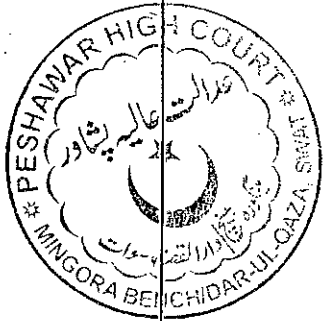
Court of .....  
Case No. .... of .....

1	Date of Order or Proceedings	Order or other Proceedings with Signature of Judge and that of parties or counsel where necessary.
	<p>01-09-2020</p>	<p><b><u>W.P No. 829-M/2020 with Interim Relief</u></b></p> <p><b>Present: Mr. Noor Muhammad Khattak, Advocate for the petitioners.</b></p> <p>*****</p> <p><b><u>WIQAR AHMAD, J.-</u></b> This order is directed to dispose of the petition filed by petitioners; under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, with the following prayer;</p> <p>“It is therefore, most humbly prayed that on acceptance of this writ petition the inaction of the respondent No. 1 by not deciding/dispose of the departmental appeals of the petitioners in light of Clause-XIV of the Transfer/ Posting Policy may be declared as illegal, unconstitutional and ineffective upon the rights of the petitioners. That the respondent No. 1 may please be directed to dispose of the departmental appeals of the petitioners in light of Clause-XIV of the Transfer/Posting Policy of the Provincial Government. Any other remedy which this august Court deems fit that may also be awarded in favor of the petitioners.”</p> <p>2. Learned counsel for petitioners at the outset requested that he would be satisfied, if respondent No. 1 is directed to decide departmental appeals of petitioners within fortnight.</p>

ATTESTED

Examiner  
Peshawar High Court Bench  
Mingora Dar-ul-Qaza, Swat.

28



3. Request of learned counsel for petitioners seems genuine. Respondent No. 1 i.e. Secretary E&SE Department, Khyber Pakhtunkhwa is therefore directed to decide departmental appeals of petitioners within a period of fourteen days positively, after receipt of order of this Court but strictly in accordance with law and rules.

4. The petition in hand is disposed of accordingly.

Announced  
Dt: 01.09.2020

*[Signature]*  
JUDGE  
*[Signature]*  
JUDGE

S.No..... 62  
Name of Applicant..... *[Signature]*  
Date of Presentation of Applicant..... 10-09-2020  
Date of Completion of Copies..... 10-09-2020  
No of Copies..... 06  
Urgent Fee.....  
Fee Charged..... 24/-  
Date of Delivery of Copies..... 10-09-2020

Certified to be true copy

*[Signature]*  
EXAMINEE  
Peshawar High Court, Mingora/District-ul-Qaza, Swat  
Authorized Under Article 87 of Qanoon-e-Shahadat Order, 1984  
10/09/2020

Office  
02/09



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
No. SO(PE)E&SED/2-1/General Transfer/Posting /2020  
Dated Peshawar the 31.08.2020

H - 29

To,

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

Subject: - APPEAL FOR WITHDRAWAL OF POSTINGS/TRANSFERS ORDER IN  
R/O ADEOs/ASDEOs (M/F) OFFICES DISTRICT DIR UPPER

Dear Sir,

I am directed to refer to the subject noted above and to intimate joint appeal of Mr. Shahid Aziz, SST GHS Kattan (B) Ex-ADEO (Secondary) Male Dir Upper, Muhammad Zada SST GHS Kattan (B) Ex-ADEO (Primary) Male Dir Upper, Muhammad Iqbal, ASDEO Brawal Ex-ADEO (P&D) Female Dir Upper and Peer Muhammad Ex-ASDEO Male Wari Circle Dir Upper, wherein they requested for withdrawal of transfer orders and restoration at their previous station/positions is accepted.

It is, therefore, directed to cancel the transfer orders of the above appellants immediately, and submit compliance report for perusal of the competent authority.

Yours faithfully,

Encl: as above:

Endst: No & date even

  
SECTION OFFICER (PRIMARY)

Copy forwarded to:-

1. The DEO (Male), District Dir Upper, for similar necessary action.
2. PS to Secretary, Elementary & Secondary Education Department, Peshawar.
3. PS to Spl: Secretary, E&SE Department, Peshawar.

**ATTESTED**  


  
SECTION OFFICER (PRIMARY)



**DIRECTORATE OF ELEMENTARY & SECONDARY  
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR**

30

**OFFICE ORDER.**

The Competent Authority is pleased to withdraw the Transfer/Posting Order bearing No. 29471-75 dated 11-08-2020 in respect of the following officers in the light of the Admin. Department letter No. SO (PE) E&SEED/2-1/General Transfer/Posting/2020 dated 31-08-2020, in the best interest of public service

SN	Name Designation	Previous Position
1	Mr. <del>Shahid Ali</del> SST GHS Kattan	ADEO (M) Secondary at a DDO (M) Dir Upper
2	Mr. <del>Muhammad Zaka</del> SST SST GHS Kattan	ADEO (M) Primary at a DDO (M) Dir Upper
3	Mr. <del>Abdullah Iqbal</del> ASDEO Barawal	ASDEO (M) Circle Barawal Dir Upper
4	Mr. <del>Peter Muhammad</del> ASDEO Larjam	ASDEO (M) Circle Wari Dir Upper

**DIRECTOR**

Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Order No. <sup>16</sup> 10-16 / F. No 32-1/ ADEO's (M) Transfer.

Dated Peshawar the 11/9/2020.

Copy of the above is to the:-

1. Section Officer (Primary) w.r.t the letter No. SO (PE) E&SEED/2-1/General Transfer/Posting/2020 dated 31-08-2020.
2. District Education Officer (M/F) Dir Upper
3. District Accounts officer Dir Upper.
4. Officer concerned.
5. PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
6. Master File.

Deputy Director (Estab)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar



**DIRECTORATE OF ELEMENTARY & SECONDARY  
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR**

J- (35)

**OFFICE ORDER.**

The Competent Authority is pleased to withdraw the Transfer/Posting Order bearing No. 210-14 dated 14-09-2020 in the light of the Admin: Department letter No. SO (PE) E&SEED/2-1/General Transfer/Posting/2020 dated 16-09-2020, from the date of issuance, in the best interest of public service.

**DIRECTOR**

Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst: No. 761-65 / F. No. 32-4/ ADEO's (M) Transfer.

Dated Peshawar the 16/6 2020.

Copy of the above is to the:-

1. Section Officer (Primary) w.r.t the letter No. SO (PE) E&SEED/2-1/General Transfer/Posting/2020 dated 16-08-2020,.
2. District Education Officer (M/F) Dir Upper
3. District Accounts officer Dir Upper.
4. Officer concerned.
5. PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
6. Master File.

Deputy Director (Estab)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

TESTED

A

B

**VAKALATNAMA**

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

\_\_\_\_\_ OF 2020

Muhammad Iqbal.

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

\_\_\_\_\_ EDUCATION DEPTT:

(RESPONDENT)  
(DEFENDANT)

I/We Muhammad Iqbal

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, 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. \_\_\_\_/\_\_\_\_/2020

Muhammad Iqbal  
CLIENT

Noor Mohammad Khattak  
**ACCEPTED**  
**NOOR MOHAMMAD KHATTAK**

Kamran Khan  
**KAMRAN KHAN**

Mir Zaman Safi  
**MIR ZAMAN SAFI**  
&

**AFRASIAB KHAN WAZIR**  
**ADVOCATES**

OFFICE:

Flat No.4, 2<sup>nd</sup> Floor, Juma Khan  
Plaza, near FATA Secretariat,  
Warsak Road, Peshawar.  
Mobile No.0345-9383141

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

Service Appeal No: 11010/2020

**Muhammad Iqbal SST/ADEO Dir Upper.....Appellant.**

**VERSUS**

Secretary (E&SE) Department, Khyber Pakhtunkhwa & others.....Respondents

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-3.**

Respectfully Sheweth:-

The Respondents submit as under:-

**Preliminary Objections.**

- 1 That the Appellant has got no cause of action/locus standi.
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal in the instant service appeal.
- 4 That the instant Service Appeal is based on mala-fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the Appellant is not entitled for the relief he has sought from this Honorable Tribunal.
- 7 That the instant Service Appeal is against the prevailing law & rules.
- 8 That the instant Appeal is based on mala fide intentions just to put extra pressure on the Respondents for gaining illegal service benefits as the appellant is basically working against the SST B-16 (TC) post in the Respondent Department.
- 9 That the instant Service Appeal is not maintainable in its present form as the impugned orders & Notifications dated 11-08-2020 & 16-09-2020 are legally competent.
- 10 That the instant Service Appeal is bad for mis-joinder & non-joinder of the necessary parties.



- 11 That the instant Service Appeal is barred by law.
- 12 That no Departmental Appeal has been filed against above mentioned orders/Notification by the appellant to the Respondent Department, hence, got final.

### ON FACTS.


- 1 That Para-1 is incorrect & denied on the grounds that the appellant is working against the SST B-16 in the Respondent Department.
2. That Para-2 is also incorrect & denied as the appellant has been reverted to his original post of SST B-16 post vide Notification dated 11-08-2020 by the competent authority, hence, the plea of the appellant is liable to be rejected **.(Copy of the Notification dated 11-08-2020 is Ann-A).**
- 3 That Para-3 is incorrect hence denied.
- 4 That Para-4 is also incorrect & denied as the competent authority has got powers & jurisdiction to transfer & post a civil servant under section 10 of civil servants Act 1973 wherever his services are required, hence, the claim of the appellant is without any legal force & justification.
- 5 That Para-5 is incorrect & denied on the grounds that the act of the Respondent Department with regard to the impugned Notification dated 11-08-2020 is within legal sphere as cited above.
- 6 That Para-6 is correct to the extent of the impugned Notification dated 11-08-2020, whereby, the appellant has been transfer & posted against his original post of SST B-16 (TC),whereas, rest of para is relates to the record of the Honorable Peshawar High Court Peshawar in W.P No. 829/2020 case titled Muhammad Iqbal etc Vs Government of KPK & others decided vide Judgment dated 01-09-2020 with the directions to the Respondent Department for the disposal of the pending Departmental Appeal against the impugned order dated 11-08-2020. **.(Copy of the Judgment dated 01-09-2020 is Ann-B).**
- 7 That Para-7 is correct that in compliance of the Judgment dated 01-09-2020 of the Honorable Court the impugned order dated 11-08-2020 has been withdrawn vide office order dated 14-09-2020 by the Respondent Department, however the same order dated 14-09-2020 has been withdrawn vide office order dated 16-09-2020 by restoring the impugned order dated 11-08-2020 by the competent authority dully actualized by the appellant vide order dated 22-09-2020.**(Copies of the order dated 14-09-2020, 16-09-2020, 22-09-2020 & charge report dated 22-09-2020 are Ann-C, D , E & F).**
- 8 That Para-8 is also incorrect & denied on the grounds that agitated in the fore going paras of the present reply, hence, needs no further comments, however, the Respondents further submit on the following grounds inter alia:-

## ON GROUNDS.

- A. **Incorrect & not admitted.** The appellant has been treated as per law & rules by the Respondent Department vide orders dated 11-08-2020 & 16-09-2020 in the instant case, hence, the stance of the appellant is baseless & liable to be rejected.
- B. **Incorrect & not admitted.** The appellant has been treated as per law, rules & policy by the Respondent Department in the instant case as mentioned in reply to ground-A.
- C. **Incorrect & not admitted.** The statement of the appellant is without any cogent reason & justification on the grounds as agitated in the foregoing paras of the present reply by the Respondents, hence, the plea of the appellant is without any justification.
- D. **Incorrect & not admitted.** The stand of the appellant is without any cogent reason & legal justification & liable to be rejected.
- E. **Incorrect & not admitted.** The plea of the appellant is without legal justification & liable to be rejected as the appellant has been treated as per law, rules & policy by the Respondent Department in the instant case, hence, the stance of the appellant is baseless & liable to be rejected.
- F. **Incorrect & not admitted.** The plea of the appellant is without legal justification & liable to be rejected as the appellant has been treated as per law, rules & policy by the Respondent Department in the instant case, hence, the stance of the appellant is baseless & liable to be rejected.
- G. **Incorrect & not admitted.** The stand of the appellant is without any cogent reason & legal justification & liable to be rejected.
- H. **Incorrect & not admitted.** The plea of the appellant is without legal justification & liable to be rejected as the appellant has been treated as per law, rules & policy by the Respondent Department in the instant case, hence, the stance of the appellant is baseless & liable to be rejected.
- I. **Incorrect & not admitted.** The plea of the appellant is without legal justification & liable to be rejected.
- J. **Legal.** However, the Respondents also seek leave of this Honorable Tribunal to submit additional grounds, record & case law at the time of arguments on the date fixed.


In view of the above made submissions, it is most humbly requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant Service Appeal in favor of the Respondents in the interest of justice.

Dated 13/11 /2020



**DIRECTOR**

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondents No: 2 & 3)



**SECRETARY**  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondent No: 1)

**AFFIDAVIT**

**I, Hayat Khan Asstt: Director (Litigation-II)** E&SE Department Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

**Deponent**

A

(1)

9

## DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR

### NOTIFICATION

The Competent Authority is pleased to order transfer/posting of the following officers in their own pay scale, with immediate effect in the interest of public service.

Name & Designation	From	To (posting to)	Remarks
Mr. Abdul Aziz SST (T.C.)	GHS Seri Sultan Khel	ADEO (Primary) at O/O DEO(M) Dir Upper	V#2
Muhammad Zahir (T.C.)	ADEO (Primary) at O/O DEO(M) Dir Upper	GHS Katan	V#1 under Administrative basis
Mr. Muhammad Hanif SST	GMS Gamdat	ASDEO Circle Warl	Vice #5
Mr. Muhammad Iqbal (M.C.)	ADEO (F) at O/O DEO(F) Dir Upper	ASDEO Circle Barwal	AVP under Administrative basis
Mr. Peer Muhammad (M.C.)	ASDEO Circle Warl	ASDEO Circle Larjam	AVP
Mr. Muhammad Bilal SST (T.C.)	GHS Malavi	ADEO (F) at O/O DEO (F) Dir Upper	Vice #4
Mr. Asad Ahmad SST (T.C.)	GHS Warl	ADEO (Secondary) at O/O DEO(M) Dir Upper	Vice #8
Mr. Shahid Aziz SST (T.C.)	ADEO (Secondary) at O/O DEO(M) Dir Upper	GHS Warl	Vice #7 under Administrative basis

- Notes:**
- Posting/adjustment of Teaching Cadre Officers shall be considered as stop-gap arrangement till the arrival of Management Cadre officers.
  - The order of the above mentioned Teaching cadre officers will be effective subject to the condition that they will give an undertaking in a legal paper/stamp paper to DEO (M/F) Dir Upper to the effect, not to claim seniority of Management cadre.
  - Charge Report should be submitted to all concerned.
  - No T.A/DA is allowed.
  - The terms & conditions mentioned in their appointment order as teaching cadre will remain intact.

DIRECTOR  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa

Order No. 2347/11/20 F.NO. 11/P/2011 ADEO(M) Transfers Cadres the Peshawar 11/2/2010

Copy forwarded to the:

- District Education Officer (M/F) Dir Upper,
- District Accounts Officer Dir Upper
- Officers Concerned.
- Master Copy.

Deputy Director (Estab)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

11/5/20

NOTED  
11/5/20

Annex B

(2)

PAWAR HIGH COURT, MINGORA BENCH (DAR-UL-QAZA), SWAT

FORM OF ORDER SHEET

18

Court of .....

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

1	2 Date of Order or Proceedings	3 Order or other Proceedings with Signature of Judge and that of parties or counsel where necessary.
	01-09-2020	<p><u>W.P No. 829-M/2020 with Interim Relief</u></p> <p>Present: <i>Mr. Noor Muhammad Khattak, Advocate for the petitioners.</i></p> <p>*****</p> <p><u>WIQAR AHMAD, J.-</u> This order is directed to dispose of the petition filed by petitioners, under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, with the following prayer:</p> <p>"It is therefore, most humbly prayed that on acceptance of this writ petition the inaction of the respondent No. 1 by not deciding/dispose of the departmental appeals of the petitioners in light of Clause-XIV of the Transfer/ Posting Policy may be declared as illegal, unconstitutional and ineffective upon the rights of the petitioners. That the respondent No. 1 may please be directed to dispose of the departmental appeals of the petitioners in light of Clause-XIV of the Transfer/Posting Policy of the Provincial Government. Any other remedy which this august Court deems fit that may also be awarded in favor of the petitioners."</p> <p>2. Learned counsel for petitioners at the outset requested that he would be satisfied, if respondent No. 1 is directed to decide departmental appeals of petitioners within fortnight.</p>

ATTESTED

HON'BLE MR. JUSTICE WIQAR AHMAD  
HON'BLE MR. JUSTICE WIQAR AHMAD

ATTESTED

Examined  
Pawar High Court Bench  
Mingora Dar-ul-Qaza, Swat.

19

3. Request of learned counsel for petitioners seems genuine. Respondent No. 1 i.e. Secretary E&SE Department, Khyber Pakhtunkhwa is therefore directed to decide departmental appeals of petitioners within a period of fourteen days positively, after receipt of order of this Court but strictly in accordance with law and rules.

4. The petition in hand is disposed of accordingly.

Announced  
Dt: 01.09.2020

*[Handwritten signature]*  
JUDGE

*[Handwritten signature]*  
JUDGE

S.No. 62  
 Name of Applicant W. I. Khan  
 Date of Presentation of Application 10-09-2020  
 Date of Completion of Copies 10-09-2020  
 No. of Copies 5-6-7  
 Urgent Fee ---  
 Fee Charged 24/-  
 Date of Delivery of Copies 10-09-2020

Verified to be true copy

*[Handwritten signature]*  
10/09/2020

CHIEF CLERK  
Khyber Pakhtunkhwa High Court, Mingora, Feroz Khan Noon Road, Swat  
Authorized Under Article 17 of Constitution of Pakistan 1973

Office  
02/09

*[Handwritten signature]*

Annex - 5 (4)

DIRECTORATE OF ELEMENTARY & SECONDARY  
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR

OFFICE ORDER.

The Competent Authority is pleased to withdraw the Transfer/Posting Order bearing No. 210-14 dated 14-09-2020 in the light of the Admin. Department letter No. SO (PE) E&SEED/2-1/General Transfer/Posting/2020 dated 16-09-2020; from the date of issuance, in the best interest of public service.

DIRECTOR /  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst. No. 761-65 F. No. 324/ADEO's (M) Transfer.

Dated Peshawar the 1/2/2020.

Copy of the above is to the:-

1. Section Officer (Primary) w.r.t the letter No. SO (PE) E&SEED/2-1/General Transfer/Posting/2020 dated 16-08-2020.
2. District Education Officer (M/F) Dir Upper
3. District Accounts officer Dir Upper.
4. Officer concerned.
5. PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
6. Master File.

Deputy Director (Estab)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

ATTESTED

Annex D

(5)

**DIRECTORATE OF ELEMENTARY & SECONDARY  
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR**

21

**OFFICE ORDER.**

The Competent Authority is pleased to withdraw the Transfer/Posting Order bearing No. 29471-75 dated 11-08-2020 in respect of the following officers in the light of the Admin: Department letter No. SO (PE) E&SEED/2-1/General Transfer/Posting/2020 dated 31-08-2020, in the best interest of public service.

S.N	Name Designation	Previous Position
1	Mr. Shahid Aziz SST GHS Kattan	ADEO (M) Secondary at o/o DEO(M) Dir Upper.
2	Mr. Muhammad Zada SST SST GHS Kattan	ADEO (M) Primary at o/o DEO(M) Dir Upper.
3	Mr. Muhammad Iqbal ASDEO Barawal	ASDEO (M) Circle barawal Dir. Upper.
4	Mr. Peer Muhammad ASDEO Larjam	ASDEO (M) Circle Wari Dir Upper.

**DIRECTOR**

Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst. No. 210 /F. No. 32-4/ ADEO's (M) Transfer.

Dated Peshawar the 14/05/2020.

Copy of the above is to the:-

1. Section Officer (Primary) w.r.t the letter No. SO (PE) E&SEED/2-1/General Transfer/Posting/2020 dated 31-08-2020.
2. District Education Officer (M/F) Dir Upper
3. District Accounts officer Dir Upper.
4. Officer concerned.
5. PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
6. Master File.

Deputy Director (Estab)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar



max F  
(7)

Charge Report

Certified that Mr, Shahid Aziz\_SST. took over charge as SST at GHS Rehankot on 22-09-2020 under Endst : 193-95 No.01/DEO (M)Dir (U)SEB Dated Dir (U) the 22/09/2020 is only for purpose of pay.

End no: 590 Dated: 22/9/20

Head Master  
Govt High School Rehankot  
Dir  
City  
U

Shahid Aziz SST  
22/9/2020