

12.07.2021

Learned Addl, A.G be reminded about the omission and for submission of reply/comments within extended time of 10 days.



Chairman

Stipulated period passed reply not submitted.

05.10.2021

Counsel for the appellant and Mr. Kabirullah Khattak, Addl. AG alongwith for the respondents present.

Counsel for the appellant has submitted an application alongwith copy of appointment order which have been placed on file. According to applicant, his grievance stands redressed by the department. This appeal is dismissed on the request of the appellant. File be consigned to the record.


(Mian Muhammad)
Member(Executive)


Chairman

ANNOUNCED
05.10.2021

31.05.2021

Counsel for the appellant present. Preliminary arguments ~~already~~ heard.

Points raised need consideration. The appeal is admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days of the receipt of notices positively. If the written reply/ comments are not submitted within the stipulated time, the office is directed to submit the file with a report of non-compliance. File to come up for arguments on 05.10.2021.

Appellant Deposited
Security & Process Fee

04/06/21




Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 4530 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/04/2021	<p>The appeal of Mr. Najeebullah presented today by Mr. Amin-ur-Rehman Yousafzai 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-	26/05/21	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>31/05/21</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Service Appeal No.____/2021

Najeeb Ullah **Appellant**

....VERSUS....

Government of Khyber Pakhtunkhwa & 02 others **Respondents**

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Appellant

Through


Amin ur Rehman Yusufzai

Sajjad Ahmad Mehsud


Khalid Khan Mohmand

Muaz Ashraf Khalil

&


M. Kareem Afridi

Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: 29.03.2021

Before the Khyber Pakhtunkhwa Services Tribunal
Peshawar.

In Re:

S.A No — /2021

Najeebullah — VS — Govt of KP & Others

Application, for and on behalf
of Appellant, for disposal of the
titled Appeal in Light of
Appointment Order dtd: 24.9.2021.

Respectfully sheweth;

① That the titled appeal is pending adjudication
before this Hon'ble Tribunal and fixed today
i.e. 25.10.2021, for onward proceedings.

② That, during pendency of the titled appeal,
respondent department appointed appellant/applicant
vide order dated: 24.9.2021, hence the instant
application.

Copy of appointment order dated: 24⁰⁹/₂₀₂₁
is attached as annex- (A)

It is, therefore, humbly prayed that on
acceptance of instant application,
the titled appeal may be disposed
of in light of appointment order
dated: 24.9.2021.

Appellant/Applicant
- through

Amin ur Rehman
Advocate Peshawar

APPOINTMENT ORDER

Consequent upon the recommendation of Departmental Selection Committee (DSC) held on 03/09/2021 in the office of District Education Officer Khyber, the recruitment/appointment of the following 21 Nos Male candidates whose test were conducted through ETEA are hereby ordered against vacant post of Arabic Teachers (17) in BPS 15 (16120-1330-56020) P.M fixed plus usual allowances as admissible with effect from the date of their taking over charge at the station school given against their name on adhoc and contract basis initially for One Year under the existing policy of the provincial Govt. of Khyber Pakhtunkhwa in teaching cadre in the interest of public service on the terms and conditions given below:-

S. No	Roll No	Name	Father Name	Score	School Name	CNIC Number
1	54254	MIRAJ UDDIN AFRIDI	SAIF UR REHMAN	137.19	GMS Paka Tara Bara	21201-2492113-9
2	54093	HIDAYAT UR REHMAN	ABDUL WAHAB	127.08	GMS Saad Ullah Jan Bara	21201-5991587-1
3	54204	EJAZ AHMAD AFRIDI	SAIF UR REHMAN	126.22	GMS Sarkai Kamar Bara	21201-4503767-1
4	54073	KHUSHAL JAN	HUNAR SHAH	124.42	GMS Tarkho Kas Bara	21201-3060944-7
5	54291	MUHAMMAD HAMZA	HAJI KHAN ABAD	122.43	GMS Nabat Sra Shaga BZK	21203-6933534-7
6	53911	LAL AKBAR	ABDUR RAZIQ	118.91	GMS Shaheed Miana Mulagori	21204-0981159-5
7	53630	FAZAL KARIM	SAID KHAN	117.46	GMS Haji Dhand Bara	21201-5407906-9
8	54172	MUHAMMAD USMAN	ZAR MUHAMMAD	116.71	GMS Toor Toor Amrozai Bara	21201-5232093-9
9	53550	ABDUCLAH	SAHAR GUL	115.53	GMS Azgho Mela Jamrud	21202-2350301-1
10	53874	JEHANGIR KHAN	INAYAT KHAN	114.05	GHS Ghundi Jamrud	21202-9414713-3
11	54069	WALIULLAH	SHAH MEHMOOD	112.66	GMS Azcem Din Killi Bara	17301-5940725-3
12	53690	NAJEEB ULLAH	WALAN SHAH	110.99	GMS Gudar Jamrud	21203-1903637-9
13	53954	QASID RAZA	EITERGUL	110.59	GMS Bara Dara Mulagori Jamrud	21204-8128337-7
14	54250	ZAIN UL ABIDEEN	ALI ABAD	110.23	GMS Zintara Landi Kotai	21203-8552744-7
15	54078	RIAZ ULLAH	SAFDAR ZAMAN	110.17	GMS Sarobi Loi Shalman	21204-7219803-7
16	53822	MUHAMMAD HABIB	KHANA DAR	110.10	GMS Wali Muhammad Kor LKL	21203-2924795-7
17	53684	MUHAMMAD ULLAH	MISRI KHAN	109.99	GMS Jan Mir Jamrud	21202-0696088-7
18	54135	JANDAD	JEHANGIR KHAN	109.53	GMS Sra Garhi Bara	17301-8440636-9
19	54240	HASHID HUSSAIN	AHMAD KHAN	109.13	GHS Hashim Abad Jamrud	21202-0606121-3
20	53924	SALAH UD DIN	RAHMAT ULLAH	108.92	GMS Bacha Subaidar Loi Shalman	21203-8508399-3
21	54248	MUHAMMAD SABIR SHAH	ABDEL RAZAQ	108.64	GMS Mehmood Killi BZK LKL	21202-6995154-7

Terms & Conditions

- Charge reports should be submitted through ASB/OS concerned within 15 days of time. Anyone who fails to submit his arrival report within specified period then his appointment will stand as cancelled.
- Appointment of the candidates is purely made on ad hoc and contract basis initially for One year and is liable to be terminated at any time without any notice.
- Appointment of the candidates are purely on ad hoc & Contract basis which are not transferable till their regularization.
- If the candidate wishes to resign his post he will give one month prior notice or his pay for one month will be forfeited in lieu thereof.
- Their documents, Date of Birth, CNIC's and domicile certificates should be checked before handing over charges of the posts and attested copies may be kept on record of the school.
- They must produce their Health and Age certificates from the District Health Officer (DHO/HMS) concerned.
- They may not be handed over charges if they are below 19 years or above 35 years.
- If any technical/legal flaw is pointed out the appointment will stand as cancelled.
- They will complete nine month in service mandatory professional training at RPDC as and when scheduled.
- No salary will be drawn before the verification of all the testimonials that submitted during scrutiny of documents and per merit of the candidates i.e. academic, professional degree, DAK's, CNIC's and Domiciles from the quarters concerned through District Education Officer Khyber at Jamrud. The candidates will bear all the expenditures in this connection. A certificate to this effect will be obtained from DEO Khyber for release of pay. If any document found fake or bogus, the appointment of the concerned candidate will stand cancelled and the matter will be reported to law enforcing agencies.
- Errors and omissions will be accepted within specified period.

(NISAR MUHAMMAD)
DISTRICT EDUCATION OFFICER
DISTRICT KHYBER AT JAMRUD

Dated: 24/9/2021

For Appellant

Amin ur Rehman
Advocate

DISTRICT EDUCATION OFFICER
DISTRICT KHYBER AT JAMRUD

- Copy of the above is forwarded to the:
- Director, E & S E, Khyber Pakhtunkhwa at Peshawar.
 - Deputy Commissioner District Khyber at Peshawar.
 - Medical Superintendent District Khyber at Landi Kotai.
 - Principal/Head Master Concerned.
 - District Accounts Officer Khyber at Jamrud.
 - Superintendent local office.
 - ADEO Local Office Pab Cerk concerned.
 - Office of Concerned.

APPOINTMENT ORDER

Consequent upon the recommendation of Departmental Selection Committee (DSC) held on 03/09/2021 in the office of District Education Officer Khyber, the recruitment/appointment of the following 21 Nos Male candidates whose test were conducted through ETEA are hereby ordered against vacant post of Arabic Teachers(AT) in BPS 15 (16120-1330-56020) P.M fixed plus usual allowances as admissible with effect from the date of their taking over charge at the station/school given against their name on adhoc and contract basis initially for One Year under the existing policy of the provincial Govt. of Khyber Pakhtunkhwa in teaching cadre in the interest of public service on the terms and conditions given below:-

S. No	Roll No	Name	Father Name	Score	School Name	CNIC Number
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6. They must produce their Health and Age certificates from the District Health Officer (DHO)/MS concerned.
7. They may not be handed over charges if they are below 19 years or above 35 years.
8. If any technical legal flaw is pointed out the appointment will stand as cancelled.
9. They will complete nine months in service mandatory professional training at RPDC as and when scheduled.
10. No salary will be drawn before the verification of all the testimonials that submitted during scrutiny of documents and per merit of the candidates i.e. academic, professional degree, DMC's, CNIC's and Domiciles from the quarters concerned through District Education Officer Khyber at Jamrud. The candidate will bear all the expenditures in this connection. A certificate to this effect will be obtained from DEO Khyber for release of pay. If any document found fake or bogus, the appointment of the concerned candidate will stand cancelled and the matter will be reported to law enforcing agencies.
11. Errors and omissions will be accepted within specified period.

(NISAR MUHAMMAD)
DISTRICT EDUCATION OFFICER
DISTRICT KHYBER AT JAMRUD

Dated

24/9/2021

7244-51

Copy of the above is forwarded to the:

1. Director, E & S I, Khyber Pakhtunkhwa at Peshawar.
2. Deputy Commissioner District Khyber at Peshawar.
3. Medical Superintendent, District Khyber at Landi Kotal.
4. Principal/Head Master concerned.
5. District Accounts Officer Khyber at Jamrud.
6. Superintendent local office.
7. ADEC Local Office Peshawar concerned.
8. Official Concerned.

For Appellant

Amin ur Rehman
Advocate

DISTRICT EDUCATION OFFICER
DISTRICT KHYBER AT JAMRUD

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

4530

Service Appeal No. _____/2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 4530

Dated 05/4/2021
Appellant

Najeeb Ullah S/O Wadan Shah,
R/O Village Sheikmal Khel, Pasid Khel, Shinwari,
Tehsil Landi Kotal, Tribal District Khyber.

....VERSUS....

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. District Education Officer (DEO), Tribal District Khyber at Jamrud. . . . Respondents

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974, READ WITH ALL ENABLING PROVISIONS OF LAW, GOVERNING THE SUBJECT, AGAINST:

OFFICE ORDER ENDORSEMENT NO.21982-91, DATED: 05.12.2020 OF RESPONDENT NO.3, VIDE WHICH APPOINTMENT ORDER ENDORSEMENT NO.19090-98/59 Nos.Male TT/Khyber, DATED: 03.07.2020 OF THE APPELLANT, AS THEOLOGY TEACHER (TT), HAS UNILATERALLY BEEN WITHDRAWN AND NOTIFICATION ENDORSEMENT NO.3126-29, DATED: 08.03.2021 OF RESPONDENT NO.2, VIDE WHICH DEPARTEMNTAL APPEAL DATED: 09.12.2020, AGAINST ORDER DATED: 05.12.2020 IBID, HAS UNILATERALLY BEEN REGRETTEED.

PRAYER-IN-APPEAL:

On acceptance of instant Service Appeal, impugned Office Order, Endorsement No.21982-21, dated 05.12.2020 of Respondent No.3, alongwith Pre & Post proceedings thereto, including Notification, Endorsement No.3126-29, dated: 08.03.2021 of Respondent No.2, may be set aside and appellant may be reinstated in service with all consequential benefits, in the best interest of justice and equity.

=====

Respectfully Sheweth:

1. That appellant is law abiding peaceful citizen of Pakistan and permanent resident of Tribal District Khyber.
(Copy of CNIC alongwith domicile certificate is attached as Annexure "A")
2. That appellant obtained Master Degree, in the year 2018, from University of Peshawar and having passed AAMMA (2003), SSC (2010) HSSC (2013) & B.A (2015).
(Copies of Educational Testimonials are attached as Annexure "B")
3. That respondent No.3, invited applications for numerous vacant positions of different categories, including Theology Teachers (BPS-15), vide Advertisement dated: 01.01.2019.
(Copy of Advertisement dated: 01.01.2019 is attached as Annexure "C")

Filed to-day

ew,
Registrar

05/04/2021

- 2
4. That appellant, being qualified, applied for one of the aforementioned advertised posts of Theology Teacher (TT) and gone through the entire process of selection successfully; eventually he, on the recommendation of Departmental Selection Committee (DSC), was appointed as TT (BPS-15), on adhoc/contract basis, vide Office Order Endorsement No.19090-98/59 Nos.Male TT/Khyber, dated: 03.07.2020.
(Copy of appointment order dated: 03.07.2020 is attached as Annexure "D")
 5. That pursuant to appointment order dated: 03.07.2020 supra, appellant was declared medically fit, evident from Medical Certificate dated: 04.07.2020, and subsequently assumed charge, evident from charge/arrival report dated: 04.07.2020 and was performing duty with zeal, devotion and utmost satisfaction of the superiors, evident from redeployment order dated: 29.09.2020, duty certificates dated: 05.10.2020 & 08.12.2020. Needless to add that, after clearance granted by the Federal Agency, he received salaries upto October 2020.
(Copies of medical certificate dated: 04.07.2020 alongwith charge/arrival report & other ancillary documents and salary slip dated: 05.10.2020 alongwith cheque are attached as Annexures "E" & "F" respectively)
 6. That Respondent Department has unilaterally stopped monthly salary of the appellant, on 12.10.2020, without just cause and reason, eventually he approached the Hon'ble Peshawar High Court, Peshawar through Writ Petition No.5019-P/2020, dated: 29.10.2020, however, during pendency whereof, appointment order dated: 03.07.2020 supra of appellant has unilaterally been withdrawn, vide Office Order dated: 05.12.2020, resultantly, Writ Petition ibid had become infructuous and was dismissed as withdrawn, vide Judgment/Order dated: 08.12.2020, with permission to approach the proper forum for redressal of his grievances.
(Copies of stoppage of salary order dated: 12.10.2020, Writ Petition No.5019-P/2020, dated: 29.10.2020, Office Order dated: 05.12.2020 & Judgment/order dated: 08.12.2020 of the Hon'ble Peshawar High Court, Peshawar are attached as Annexures "G", "H", "I" & "J" respectively)
 7. That appellant preferred departmental appeal dated: 09.12.2020 to Respondent No.2, against order dated: 05.12.2020, which has unilaterally been regretted, vide Notification dated: 08.03.2021.
(Copies of departmental appeal dated: 09.12.2020 and Notification dated: 08.03.2021 of Respondent No.3 are attached as Annexures "K" & "L" respectively).
 8. That appellant, being aggrieved of Office Order dated: 05.12.2020 supra of Respondent No.3 and subsequent Notification dated: 08.03.2021 supra of Respondent No.2, approaches this Hon'ble Tribunal, inter-alia, on the following grounds:

GROUND S:

- A. That impugned Office Order dated: 05.12.2020 supra of Respondent No.3 and subsequent Notification dated: 08.03.2021 supra of Respondent No.2 are against the law and peculiar facts / circumstances of the case of appellant, hence carry no legal weight.
- B. That Respondent Department, prior to issuance of impugned Office Order dated: 05.12.2020, has neither granted opportunity of proper hearing to appellant nor mandatory show cause notice has either been issued or served upon him, hence has been condemned unheard, which attracts the doctrine of audi alteram partem.

- C. That lawful order of appointment of appellant has unilaterally been withdrawn by the Respondent Department, without just cause/reason and conducting regular inquiry into his guilt, which speaks volumes of malafide on part of the Respondent Department.
- D. That appellant has neither been treated in accordance with law nor he has been provided equal protection of law, rather he has not been provided fair opportunity to defend himself, as enshrined in Article-10A of the Constitution of Islamic Republic of Pakistan 1973, hence the respondent department has acted without jurisdiction.
- E. That appellant, being qualified, was appointed after due process of law and fulfillment of legal/codal formalities, however shunt-out from service with a single stroke of pen, without care and caution of its legal consequences, which has caused grave miscarriage of justice. Needless to add that he served the Respondent Department for more than 5 months and, during this period, no one has complained either with regard to his inefficiency or least interest in professional duties.
- F. That any other grounds, with the permission of this Hon'ble Tribunal, will be taken at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of instant Service Appeal, impugned Office Order, Endorsement No.21982-21, dated 05.12.2020 of Respondent No.3, alongwith Pre & Post proceedings thereto, including Notification, Endorsement No.3126-29, dated: 08.03.2021 of Respondent No.2, may be set aside and appellant may be reinstated in service with all consequential benefits, in the best interest of justice and equity.

Any other relief, not specifically prayed for and deemed appropriate by this Hon'ble Tribunal in circumstances of the case may also be granted.


Appellant

Through

Amin ur Rehman Yusufzai

Sajjad Ahmad Mehsud

Khalid Khan Mohmand

Muaz Ashraf Khalil

&


M. Karim Afridi

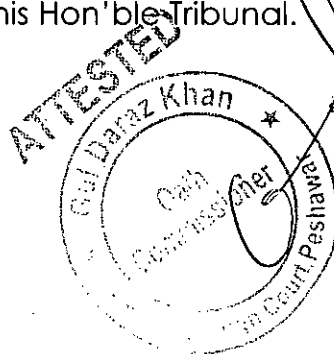
Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: 29.03.2021

VERIFICATION:

As per instructions of Verified on oath that the content of the instant Service Appeal is true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Tribunal.




Deponent

4

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

C.M. No. _____ of 2021
I N
Service Appeal No. ____/2021

Najeeb Ullah **Appellant**

....VERSUS....


Government of Khyber Pakhtunkhwa & 02 others **Respondents**

**APPLICATION FOR DIRECTING THE RESPONDENT DEPARTMENT NOT TO
FILL UP POST OF THEOLOGY TEACHER (TT), VACATED FROM APPELLANT,
TILL FINAL DECISION OF THE TITLED SERVICE APPEAL.**

Respectfully Sheweth:-

1. That the titled appeal has been filed today wherein no date has yet been fixed for hearing.
2. That facts and grounds of the titled appeal may be considered as integral part and parcel of instant application.
3. That valuable rights of applicant/appellant are involved into the matter and if the subject relief has not been granted he will suffer irreparable loss. Moreover, he has got good prima facie case in his favour and is very much sanguine of its success & balance of convenience also lies in his favor.

It is therefore, most humbly prayed that on acceptance of instant application, Respondent Department may please be directed not to full up post of Theology Teacher (TT), vacated from appellant, till final decision of the titled appeal.


Appellant
Through

Amin ur Rehman Yusufzai

Sajjad Ahmad Mehsud

Khalid Khan Mohmand

Muaz Ashraf Khalil

&


M. Kareem Afridi

Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: 29.03.2021

5

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

C.M. No. _____ of 2021
I N
Service Appeal No. ____/2021

Najeeb Ullah **Appellant**

....VERSUS....

Government of Khyber Pakhtunkhwa & 02 others **Respondents**

AFFIDAVIT

I, Najeeb Ullah S/O Wadan Shah, R/O Village Sheikmal Khel, Pasid Khel, Shinwari, Tehsil Landi Kotal, Tribal District Khyber, do hereby solemnly affirm declare on oath that the contents of the accompanying **Appeal** are true and correct to the best of my knowledge and belief, and that nothing has been kept concealed from this Hon'ble Tribunal.

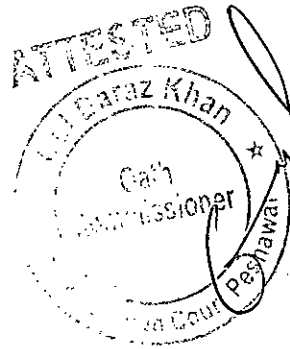
Identified By:

DEPONENT

CNIC #: 21203-1903637-9

Cell # : 0301-8851522

Amin-ur-Rehman Yusufzai
Advocate, Peshawar



25/4/21

6

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Service Appeal No.____/2021

Najeeb Ullah **Appellant**

....VERSUS....

Government of Khyber Pakhtunkhwa & 02 others **Respondents**

ADDRESSES OF THE PARTIES

APPELLANT:

Najeeb Ullah S/O Wadan Shah,
R/O Village Sheikhmal Khel, Pasid Khel, Shinwari,
Tehsil Landi Kotal, Tribal District Khyber.

RESPONDENTS:

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. District Education Officer (DEO), Tribal District Khyber at Jamrud.



Appellant

Through

Amin ur Rehman Yusufzai

Sajjad Ahmad Mehsud

Khalid Khan Mohmand


Muaz Ashraf Khalil

&


M. Kareem Afridi

Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: 29.03.2021

Annex A

7

PAKISTAN National Identity Card

Name: Nareed Ilyas

Gender: Male

Identity Number: 21203-1903637-95-1988

Date of Birth: 08-09-2016

Date of Expiry: 08-09-2025

Holder's Signature

42467

Asstt. District Education Officer
(Male) Tehsil Landikotal Khyber Tribal Distt.

21203-1903637-95-1988

گمشدہ کارڈ ملنے پر قریبی لیڈ بکس میں ڈال دیں

Registrar General of Pakistan

Attested

[Signature]



8

DOMICILE CERTIFICATE

Khyber Tribal District


Certified that Mr./Miss./Mrs. Najeeb Ullah
Son/daughter /wife of Wadan Shah
Belongs to a recognized tribe of Shinwari
Section Sheikhmal Khel Sub section Pasid Khel
Residence/village Landi Kotal


And his /her father is a permanent bonafide resident of the Khyber Tribal District.

Attested

Verified

Tehsildar Landikotal
Tehsildar
Landi Kotal
24/1/20

Attested

Assistant Commissioner,
Landikotal Sub Division
Assistant Commissioner
Landi Kotal
9/13 1-1-2020

Countersigned

Deputy Commissioner,
Khyber Tribal District
Deputy Commissioner,
Khyber Tribal District

No. 40 FCHK
1-1-2020
No. 3314
24/1/20
10-01-2020
577/EC

(9)

(4)

بیان سفید ریشان

ہم مندرجہ ذیل سفید ریشان اس امر کی تصدیق کرتے ہیں کہ

مسلمی نجیب اللہ ولد ودان شاہ

قوم شینواری تپہ شیخمل خیل سکنہ پسید خیل

تخصیص وڈا کھانہ لنڈیکوٹل ضلع خیبر ٹراپل کا/کی اصل اور سکونتی باشندہ ہے۔ ضلع خیبر ٹراپل میں جائیدار رکھتا/رکھتی ہے۔ اور حکومت پاکستان کا/کی وفادار ہے۔ قوم کے ساتھ نفع و نقصان میں برابر کا/کی شریک ہے، اور اس ضمن میں ہم ہر قسم کی ذمہ داری قبول کرتے ہیں۔ نیز اگر مندرجہ بالا تصدیق میں کسی قسم کی کوئی غلطی یا جھوٹ پایا گیا تو ہم مبلغ پچاس ہزار (۵۰۰۰۰) روپیہ کلد اضر ب پاکستانی فی نفر بطور جرمانہ حکومت پاکستان کو ادا کریں گے۔

سفید ریش

سفید ریش

تاج محمد نسیم خیل
21203-6966504-3
0343-9760376

Fursan

سفید ریش

BANO

سفید ریش

For All Star Punjab
Shinwari Khel, Mandi Kotal
CNIC No: 21203-6966504-3
Mob: 0343-9760376

ATTESTED

Subsildar
Landi Kotal

24/12/19

Attested

Amn Khan

(B)

10

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

تنظیم المدارس اہل السنۃ پاکستان (مستجملہ)

0056148

رقم الس ۹۷۷



الشہادیۃ الشافعیۃ (میتھزک)

الحمد لله رب العالمين والصلوة والسلام على خاتم الانبياء والمرسلين وعلى الله واصحابه اجمعين

نشہد بان نجیب اللہ ابن/بنت ودان شاہ

وتاریخ میلادہ ۱۸/۱۱/۱۰۰۱ ورقم النجیل ۱۳-۱۲ ورقم الجلوس ۱۳۲۸

من طلاب دادالعلوم جنیدہ غفورہ بہشاورد

قد حصل/حصلت على الشهادة الثانوية العامة (میتھزک) بعد اجتياز

الامتحان المنفقد باشراف تنظيم المدارس (اهل السنة) باكتات

في ۱۳۲۳ الموافق ۲۰۰۳ ش بتقدير الجيد وعدد درجاته ۳۹۳/۷۰۰ فقط

ونسال الله عزوجل ان يسلك بهما سبيل العلماء العاملين

مستجملہ
الرئيس

تنظيم المدارس اهل السنة
پاکستان

Handwritten signature

الامين العام

تنظيم المدارس اهل السنة

المكتب المركزي
لتنظيم المدارس اهل السنة باكستان
داري باله شارع رابعت الامسرد

محل الاصدار

تاريخ الاجراء المظفر ۱۴۲۵ھ

S.No. PB

15350273

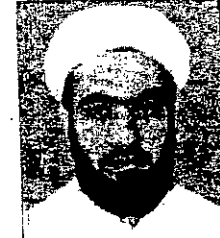
BOARD OF INTERMEDIATE & SECONDARY EDUCATION



REVISED

Roll No 162897
Group ARTS

PESHAWAR



PROVISIONAL AND DETAILED MARKS CERTIFICATE
SECONDARY SCHOOL CERTIFICATE EXAMINATION
SESSION ANNUAL 2010

Additional Subject(s)

Najeeb Ullah Son/Daughter of Wadan Shah

of KHYBER AGENCY

has secured the marks shown against each subject, in the Secondary School Certificate Examination held in the month of _____ as Private Student

Subjects	Marks	MARKS OBTAINED				Total	In Words
		9th		10th			
		Theory Paper A	Practical Paper B	Theory Paper A	Practical Paper B		
1. English	150	44	--	54	--	98	Ninety-Eight
2. Urdu	150	45	--	58	--	103	One Hundred Three
3. Pakistan Studies	75	--	--	37	--	37	Thirty-Seven

Total 375

238 Two Hundred Thirty-Eight Only

Remarks

Add: Subj:

Date of Birth: 01st January, 1986

Enrolment No:

Checked by: _____

Issue Date: 13-02-2018

[Signature]
Controller of Examinations

Note: Error(s) / Omission(s) excepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this certificate

Accepted
[Signature]

12

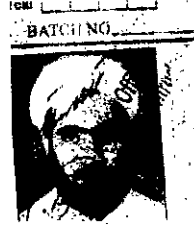
114105

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Sr No. 40651

Roll No. _____

Board of Intermediate and Secondary Education
Peshawar Khyber Pakhtunkhwa
Pakistan



Intermediate Examination

(Theology Group)

SESSION ANNUAL 2013

This is to Certify that Najeeb Ullah
Son of Wadan Shah
Private student of Peshawar District

has passed the Intermediate Examination of the Board of Intermediate & Secondary Education
Peshawar, held in May, 2013. He obtained 768 marks out of 1100 and has been
placed in grade B representing Very Good. The examination was taken in parts.

Registered No. 3 015-B/ P-2011

Zwadda
Asstt. Secretary

Q. f
Secretary

This certificate is issued without alteration or erasure.

Attested
[Signature]



University of Peshawar Pakistan

This certifies that

Najeeb Ullah son of Wadan Shah

having fulfilled all the requirements is hereby admitted to the degree of

Master of Arts in Islamiyat

and is entitled to all the rights, honours and privileges thereunto appertaining.

Given this 22nd day of March, 2018.

Roll No: 25357

Session: Annual 2017

Reg. No: 2014-PE-13239



147263

Attested

[Signature]
Registrar

[Signature]
Vice Chancellor



University of Peshawar Pakistan

This certifies that

Najeeb Ullah son of Wadan Shah

having fulfilled all the requirements is hereby admitted to the degree of

Bachelor of Arts

and is entitled to all the rights, honours and privileges thereunto appertaining.

Given this 21st day of September, 2015.

Roll No: 60278

Session: Annual 2015

Reg. No: 2014-PE-13239



140138


Registrar


Vice Chancellor

(14)



**DISTRICT EDUCATION OFFICE
DISTRICT KHYBER AT JAMRUD**

PHONE: 091-5820584 FAX 091-5820584
No: _____ DATED: _____ /2020

Annex

(D)

(16)

APPOINTMENT ORDER

Consequent upon the recommendation of Departmental Selection Committee (DSC) during its meeting held on 29/04/2020, the following 59 No.s Theology Teachers (TT) are hereby appointed, in accordance with the Govt. Khyber Pakhtunkhwa Elementary and Secondary Department college/contract/school based existing policy in BPS 15 (16120-133(-56020) P.M Fixed plus usual allowances as admissible under the rules against the posts/schools mentioned against their names from the date of their taking over charge in the interest of public of service with the following terms & conditions:-

Annex c
ATTACHED

S.No	Roll No	Name	Father Name	Score	School Code	School Name	CNIC Number
1	63216	ZAFD MEHMOOD	MAWAZ KHAN	129.37	32036	GPS Barami Alam Sher Bara	21201-2167071-3
2	63868	ISHAQ	ABDUL MALIK	128.78	32829	GPS Prang Dara Landi Kotal	21203-9059210-9
3	63260	ANWAR SIDDIQ	FARHAD	125.78	32028	GPS Tandi Bara	21201-5584464-7
4	63330	ZEB KHAN	MUHAMMAD YOUNAS	124.04	32387	GPS Tora Tara Jamrud	21202-4953917-5
5	63342	AHMAD KHAN	GUL AFZAL	122.32	32904	GPS Shalobar Bara	21201-7591849-1
6	63889	MUHAMMAD HAMZA	HAJI KHAN ABAD	121.43	32344	GPS Chora NO.3 Jamrud	21203-6933534-7
7	63053	QASID RAZA	EITER GUL	120.59	32342	GPS Bar Dara Landi Kotal	21204-8128337-7
8	63752	SAFEER JAN	TAJ MALOOK	119.69	32394	GPS Zardad Killi Jamrud	21202-6107575-5
9	63417	SHAMROZE KHAN	KACHKOL KHAN	119.57	32047	GPS Allah Dhand Bara	21201-7465372-1
10	63584	MARJAN ALI	JAN MUHAMMAD	118.8...	32016	GPS Sara Ghari Bara	17301-4355425-7
11	63167	ABDUL HASEEB	KHAN GUL	118.73	32031	GPS Susviki Bara	17301-3621138-1
12	63853	ABDUS SALAM	JALANDAR KHAN	118.65	32014	GPS Sarkai Kamar Bara	21201-7158282-9
13	63006	MUHAMMAD ILYAS	NASRULLAH KHAN	118.23	32000	GPS Hussain Gul Killi Bara	21201-9204435-5
14	63227	IRFANULLAH	LAIQ SHAH	117.86	32062	GPS Babar Khel Bara	21201-8943711-3
15	63107	SAMIN SHER	MIAN ABAD	117.28	32395	GPS Zarshah Jamrud	21202-7152918-5
16	63760	GUL ISLAM	SALEH KHAN	117.14	32058	GPS Jani Ghari Bara	21201-1375081-7
17	63298	FAZAL AMIN	GUL BAZ KHAN	116.72	32007	GPS Sur Kass No.4 Bara	21201-5608669-1
18	63044	BAKHTIAR KHAN AFRIDI	ABID KHAN AFRIDI	115.89	32093	GPS Yara Jan Bara	17301-7052671-7
19	63526	MUHAMMAD YUNIS KHAN	RAHMAT KHAN	115.12	32653	GPS Shin Pokh NO.2 Landi Kotal	21203-5514682-5
20	63828	ABDUL WAHAB MUHAMMAD	ABDUL SATTAR	114.93	32358	GPS Jawar Maina Jamrud	21202-4025331-3
21	63711	RAHMAN	ISMAIL	113.14	32655	GPS Naray Dara Landi Kotal	21203-2112536-5
22	63443	SAID AMIN	SAIF UD DIN	112.98	32652	GPS Sheen Pokh No.1 Landi Kotal	31203-3907989-3
23	63541	SIAL KHAN	KHOSHAB KHAN	112.41	32830	GPS Badshah Mir Landi Kotal	21201-8937099-9
24	63136	ISHFAQ KHAN	HAYA KHAN	111.25	32021	GPS Abdar Killi Bara	21201-7864638-3
25	63501	KIRAMAT KHAN	QUDRAT SHAH	111.05	32894	GPS Kohi Sher Haider Bara	21201-2204784-7
26	63092	NOOR RAHMAN	SHAL MUHAMMAD	110.56	32049	GPS Meri Khel Bara	21201-5876253-3
27	63543	ALAM ZAIB	NASRULLAH	110.51	32883	GPS Azcen Killi Bara	21201-1465305-5
28	63140	NAIK AMAL KHAN	HAJI PAHLAWAN	110.41	32420	GPS Chora Jamrud	21201-8509385-3
29	63111	SHAHZAD GUL	ABDUL MANAN	110.29	32401	GPS Tauda Mela	21201-9100051-1
30	63047	WARIS KHAN	JANAT GUL	110.19	32116	GPS Mastak Bara	21201-6301936-7
31	63344	ABDUL MAJEED	WALI KHAN	110.02	32002	GPS Shalobar No.3	21201-8942888-3
32	63589	HAZRAT WALI MUHAMMAD	SARWAR KHAN	109.16	32650	GPS Gulab Killi Landi Kotal	21203-0528439-1
33	63158	RAFIQ	NASAR KHAN	108.89	32843	GPS Haji Dhand Bara	21201-4388355-1

Attested

Assistant District Education Officer Landi Kotal

Assistant District Education Officer Landi Kotal

12

17

34	63292	MUHAMMAD IBRAHIM	ANWAR UL HAQ	108.82	32889	GPS Sama Ghri Bara	17301-1341241-9
35	63205	TARIQ	ABDUL MUHAMMAD	108.74	32003	GPS Hisspr No.2 Bara	17301-8716354-1
36	63220	MUHAMMAD UMAR	WALAYAT SHAH	108.69	32010	GPS Sam Baba Bara	21201-8138711-7
37	63484	GOJAHAMAD	SANAB GUL	108.61	32418	GPS Main Morcha Jamrud	21204-0362203-3
38	63284	MINHAJ UD DIN	UTMAN KHEL	108.38	32061	GPS Churika Bara	21201-7948911-7
39	63857	IRSHAD ULLAH	KHUSH MEER	108.16	32433	GPS Shagai Jamrud	21202-1182925-9
40	63426	HAJI KHAN	REHMAN GUL	108.09	32091	GPS Warmando Mela Jamrud	21202-8450279-7
41	63319	MARIB GUL	ALI JAN	107.76	32760	GPS Haneef Killi Landi Kotal	21202-3113852-7
42	63176	ABDUL GHAFOR	AKBAR HUSSAIN	107.36	32381	GPS Shaheed Mina Jamrud	21201-2945589-9
43	63323	MUHAMMAD ILYAS	ISLAM MUHAMMAD	107.22	32648	GPS Asif Killi Landi Kotal	21201-8255852-9
44	63106	MERAJ KHAN	ISMAEEL KHAN	106.84	32048	GPS Lal Muhammad Bara	21202-1890914-3
45	63481	WAHID SHAH	MEHBOOH SHAH	106.69	32432	GMS Chappari Jamrud	21201-9519343-5
46	63390	IHSAN UL HAQ	MUHAMMAD ALAM	106.37	32892	GPS Zawa Bara	21202-8933776-7
47	63058	HAZRAT ULLAH	RAHMAT ULLAH	106.19	32380	GPS Shin Tang Jamrud	21203-3693600-5
48	63471	RAHAT ULLAH	MUHAMMAD ALI	105.49	32651	GPS Sind Ghara Landi Kotal	21203-5988475-3
49	63193	SHAN AFAZAL	SAID AFAZAL	104.4	32659	GPS Dargay Karamina Landi Kotal	21203-2486145-5
50	63518	LIAQAT ULLAH	AJMAL KHAN	103.89	32644	GPS Sarobi Loi shalman	21201-4283878-7
51	63290	SAHIB KHAN	YARAB KHAN	103.37	32032	GPS Khuna Zairai Bara	21202-2929578-7
52	63147	NAUSHAD ALI KHAN	BADSHAH KHAN	103.25	32802	GPS Sur Kamar Jamrud	21203-8225472-3
53	63141	AKBAR ULLAH	SABIR KHAN	103.21	32654	GPS Ogda Dara Landi Kotal	21201-2686575-5
54	63029	SARFARAZ KHAN	RASOOL KHAN	102.98	32811	GPS Chora Jamrud	21203-3724449-5
55	63401	JAHIR KHAN	VELY GUL	102.93	32646	GPS Wazir No.2 Landi Kotal	21203-9264943-1
56	63090	NAZ WALI	NOOR MUHAMMAD	102.32	32374	GPS Qadpos Killi Jamrud	21201-9962360-9
57	63727	MUHAMMAD IBRAHIM	MUHAMMAD SHARIF	102.22	32051	GPS Ghulam Sher Bara	21204-4379431-1
58	63751	SAID MUHAMMAD	MUHAMMAD ISA SHAH	101.52	32805	GPS Kam Shalman Landi Kotal	21203-6781057-7
59	63326	ULTAF KHAN	MUHAMMAD IBRAHIM	101.46	32656	GPS Samsai Minadar Landi Kotal	21203-6781057-7

ATTESTED

TERMS CONDITIONS

1. They should join their post within 15 days of the issuance of the appointment order in case of failure their appointment will expire automatically and no subsequent appeal should be entertained.
 2. Appointment is purely made on adhoc and contract basis, initially for one year and is liable to be terminated at any time without any notice.
 3. They should not be handed over charge if they exceed 35 years or below 19 years of age, a relaxation case may be submitted to competent authority if required.
 4. If anyone wrong position holder candidate having low score was appointed erroneously his appointment should be considered cancelled at any time.
 5. District Accounts Officer (DAO) Khyber should release their salaries on the production of duty certificate duly signed by the Principal/Head Master/ DDO concerned and C/Signed by the Undersigned.
 6. They will receive nine (09) months in-service mandatory professional training at FITE/ GUETPITE.
- If the candidate wishes to resign his post he will give one month prior notice or his pay for one month will be forfeited in lieu thereof.

18/07/22

Attested

District Officer

Assistant District Education Officer Landi Kotal

13

18

- 8. Their Salaries will be released conditionally and the appointees will produce a Judicial Stamp Paper, that if their documents/credentials were found bogus/fake then he will refund the entire emoluments and the Govt. Treasury and their service will be terminated from the date of appointment.
- 9. They should produce their Health and Age Certificate from the DHO/MS concerned.
- 10. If any technical legal flaw is pointed out, the appointment will stand cancelled.
- 11. Errors and omissions will be accepted within specified period.

DISTRICT EDUCATION OFFICER
DISTRICT KHYBER AT JAMRUD

Dated 08/06/2020 ✓

[Signature]
ATTESTED

Endst: No. 18781- 89/59 No.s Male TT/Khyber

- Copy of the above is forwarded to the:
- 1. Director E. & S E Khyber Pakhtunkhwa at Peshawar.
 - 2. Deputy Commissioner Khyber Tribal District at Peshawar.
 - 3. District Health Officer District Khyber at Landi Kotal.
 - 4. Principal Head Master Concerned.
 - 5. District Accounts Officer Khyber at Jamrud.
 - 6. Superintendent local office.
 - 7. EMIS Local office.
 - 8. ADEO Local Office/Pay Clerk concerned.
 - 9. Official Concerned.

[Signature]
08/6/20
DISTRICT EDUCATION OFFICER
DISTRICT KHYBER AT JAMRUD

[Signature]
Master
Muz

to be signed
conditionally

[Signature]
Muz

Attested

[Signature]



DISTRICT EDUCATION OFFICE
DISTRICT KHYBER AT JAMRUD
PHONE. 091-5820584 FAX 091-5820584
No: _____ DATED: ____/____/2020

(18)

OFFICE ORDER

In continuation of appointment order already issued by this office Endst.No. 18781- 89/59 No.s Male TT Khyber Dated, 08/06/2020 following necessary amendments has been made in the interest of public.

S. No	Roll No	Name	Father Name	Score	School Code	School Name	CNIC Number	Remarks
1	63331	SAID MUHAMMAD	MUHAMMAD ISA SHAH	101.52	32805	GPS Kam Shalmaq Landi Kotal	21204-4379131-1	Appointment Order at S.NO 58 is hereby withdrawn from the date of issue due to low score in school based policy
2	63326	ILFAT KHAN	MUHAMMAD IBRAHIM	101.46	32656	GPS Samsai Minadar Landi Kotal	21203-6781087-7	Appointment Order at S.NO 59 is hereby withdrawn from the date of issue due to low score in school based policy
3	63349	MARIB GUL	ALI JAN	107.76	32805	GPS Kam Shalmaq Landi Kotal	21202-3113852-7	Adjustment ✓
4	63306	MUHAMMAD ILYAS	NASRULLAH KHAN	118.23	32656	GPS Samsai Minadar Landi Kotal	21201-9204435-5	Adjustment ✓
5	63446	MUBARAK SHAH	SHAHEEN SHAH	102.82	32760	GPS Hanif Killi BZK Landi Kotal	21203-1035354-7	Appointed V.Serial No. 01 ✓
6	63443	SAJEEB ULLAH	WADAN SHAH	101.93	32648	GPS Asif Killi Lai Shalmaq Landi Kotal	21203-1903637-9	Appointed V.Serial No. 02 ✓

Note: Terms and conditions will be the same already Endorsed in appointment order of TT.

(MUHAMMAD SHAIKAT)
DISTRICT EDUCATION OFFICER
DISTRICT KHYBER AT JAMRUD

Endst.No. 19090-98759 No.s Male TT Khyber

Dated: 03/07/2020

Copy of the above is forwarded to the:

1. Director, F & S E, Khyber Pakhtunkhwa at Peshawar.
2. Deputy Commissioner Khyber Tribal District at Peshawar.
3. District Health Officer District Khyber at Landi Kotal
4. Principal/Head Master Concerned.
5. District Accounts Officer Khyber at Jamrud.
6. Superintendent local office
7. EMB local office
8. ADO Local Office/Pay Clerk concerned
9. Official Concerned

Attested

(Signature)
DISTRICT EDUCATION OFFICER
DISTRICT KHYBER AT JAMRUD

MEDICAL CERTIFICATE

(90)
(E)

~~Signature~~

Name of Official

Mr. Nageebullah

Caste of Race

"Shinwari"

Father's Name

Mr. Wadan Shah

Residence

Sheikmarial Shinwar - Tel - Landikotal

Date of Birth 1-1-1986

Exact height by measurement

5-6"

Personal Mark of Identification

NIC

Signature of the official

[Signature]

Seal of Office

I do hereby certify that I have examined Mr. Nageebullah

candidate for employment in the office of the Educator Dept and

can not discover that he had any disease communicable or other constitutional

affection or bodily infirmity except

NIC

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

Educator. His age according to School Certificate / NIC is 34 years

and by appearance about thirty four years

LEFT HAND THUMB AND INDEX



[Signature]

Medical Superintendent,
District Headquarter Hospital,
Landikotal.

04/07/2020

[Signature]

24

CHARGE REPORT

(For New Appointee Only)

Mr. NAJEEB ULLAH s/o WADAN SHAH is hereby appointed


against the vacant post of TT on school based in BPS-15 GPS Asif Killi

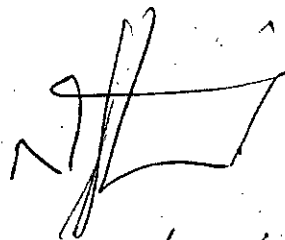

toi Shalman Landi Kotal upon the recommendation of departmental

selection committee vide DEO Khyber at Jamrud Endst:No.19090-

98/59 No.s Male TT/Khyber dated 03/07/2020 took over charge on

04/07/2020 before afternoon.


Assistant
District Education Officer
Landikotal


04/07/2020

Signature
ADEO Landi Kotal Khyber
Assistant
District Education Officer
Landikotal

Attested


29

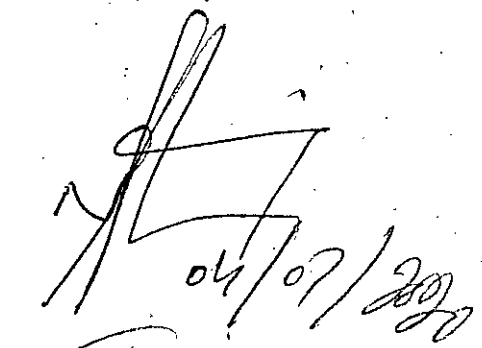
Arrival Report

I, Mr. NAJEEB ULLAH s/o WADAN SHAH appointed as TT in

BPS-15 arrived at the place of posting GPS Asif Killi Loi Shalman


Landi Kotal district Khyber today on 04/07/2020 vide DEO Khyber,

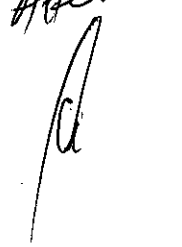
Ordinat: No. 19090-98/59 No.s Male TT/Khyber, Dated 03/07/2020.


04/07/2020

ADEO

Landi Kotal


Assistant
District Education Officer
Landi Kotal

Attested


23

DUTY CERTIFICATE

In compliance with appointment order issued by District Education Officer Khyber vide Order No: 10000-08/59 No.6 Male TT /Khyber dated 03 July 2020.

Mr. Najeeb Ullah S/O Wadon Shah has taken charge as GPS Asif Killi Lol Shalman Landi Kotal against sanctioned vacant Post of TT on dated 04, July 2020. It is further stated that he has also joined his duty at the same station on 08, August 2020. Soon after the notification is issued by the Government of KPK.

In charge
GPS Asif Killi Lol Shalman Landi Kotal

ADEO LKL

Amir
25-09-2020
District Education Officer
Layyah

Amir
05/10/20

Attested
[Signature]

29

Dated: 29/09/2020

Redeployment Order

Mr. Najeeb TT ^{Mr. Allah} CPS Asif ^{Lu-Shalman} is hereby redeployed to EPS Wazir ^{Dahand}
Jamrud District Khyber in the best interest of the students.

ADEO
Landi Kotal
District Khyber

Mr

29-09-2020
Assistant
District Education Officer
Landikotal

Attested
[Signature]

25

Duty Certificate

GPS Wazir Dand

Attested

It is verified that Mr. Najeeb Ullah S/o Wadan Shah has taken charge at **GPS Wazir Dand** on **October 1st, 2020** and is regularly performing his duty and attending his classes till now.

Wajid

Date: 08/12/2020
Wajid Muhammad Afridi
PSHT
GPS Wazir Dand Jamrud
District Khyber

Annexure

26

20

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P NO: 951668

Accounts Office Khyber
PAYROLL REGISTER
For the month of September, 2020

Page : 1
Date : 05.10.2020

Kno. BEO Primary Education Khyber		Payroll Section : 001 Payroll 1		Cash Center:			
NO	CHARGE LINE	AMOUNT	DEDUCTIONS	AMOUNT	Grade: 15 NTH. LOAN/FUND	Dockle No. PRINCIPAL	Gazetted/Non-Gazetted: N REPAID BALANCE
0099	Basic Pay	16,120.00	3015 AFP Subscription	2,890.00-		CPF#:	2,890.00
1000	Costs Post Allowance	2,349.00	3501 Benevolent Fund	400.00-			
1210	House Allowance 20	2,856.00	3890 Emp. Edu. Fund KPR	125.00-			
1360	House Allowance	1,500.00	4004 S. Benefits & Death C	600.00-			
1528	Transportation Allowance	1,790.00					
2211	House Ration Allowance	1,351.00					
2224	House Ration Allowance	1,612.00					
2247	House Ration Allowance	1,612.00					
2264	House Ration Allowance	1,612.00					
PAYMENTS		30,712.00	DEDUCTIONS	4,215.00-	NET PAY	26,497.00	01.09.2020 30.09.2020
Branch Code:			Payment through BDO			Accat.No:	

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27

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Attested
Handwritten signature

BOX

PLS A/C 03736004

Cheque No 39857656

THE BANK OF KHYBER
JAMRUD BRANCH (0125) KHYBER AGENCY PAKISTAN

Date 05-11-2020

Pay Mareebullah or bearer

Rupees Twenty five thousand four hundred & sixty seven

PKR 26497/-

PK98 KHYB 0125 0000 0373 6004
DISTRICT EDUCATION OFFICER KHYBER DISST

Signature
D.D.O.

Please do not write below this line

DISTRICT EDUCATION OFFICE
KHYBER AGENCY DISTRICT AT JAMRUD

⑈ 39857656 ⑈ 06 10 1 25 0 1 25000003 736004 ⑈ 000 ⑈

G1
28

ANNEXED
Amir

Amir
Amir

**PAYROLL SYSTEM
AMENDMENT FORM
SINGLE EMPLOYEE ENTRY**

OFFICE OF THE DISTRICT EDUCATION OFFICER KHYBER AT JAMMUD
FOR THE MONTH OF OCTOBER 2020

DUO Code (CMI Center) K M 6 0 1 1

Employee Number 0 0 9 5 1 6 6 8

Employee Name NAJEEB ULLAH

Employee ID Card Number

Grade (Pay Scale Grade) 1 5 TT

Employment Status STOP

GENERAL DATA CHANGE		CHANGE IN PAYMENTS / DEDUCTIONS						Effective Date	Remarks
Entry Type	Entry ID	New Contents	Wage Type	Reps	Amount	Deduction	Adj		
		PAY STOPPED			PAY STOPPED				DUE TO SOME TECHNICAL ERROR/LOW SCORE PAY MAY PLEASE BE STOPPED TILL FURTHER ORDER OF THIS OFFICE

Sahib
10/2/2020

District Account Officer
Khyber Jammud
(Signature)

25

Amme Khan (H) 29
1

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR

W.P No. _____/2020



Najeeb Ullah S/O Wadan Shah R/O Sheikh Mal Khel,
Landi Kotal presently serving as TT Teacher in GPMS
Wazir Dhand Jamrud District Khyber

.....Petitioner

VERSUS

1. Govt of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar.
2. Govt of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar.
3. District Education Officer, Khyber at Jamrud.
4. Assistant District Education Officer, Khyber at Jamrud.
5. District Accounts Officer, Khyber at Jamrud.

.....Respondents

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

Respectfully Sheweth:

BRIEF FACTS:-

1. That petitioner belongs to Landi Kotal District Khyber and presently serving as Theology Teacher in Govt Primary School Wazir Dhand Jamrud

ATTESTED

EXAMINER
Peshawar High Court

LI

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(30)

District Khyber. **(Copy of CNIC is attached as Annexure "A")**.

2. That the office of the respondent No.3 advertised different posts including Theology Teacher and petitioner applied for the said post. **(Copy of advertisement is attached as Annexure "B")**.
3. That after all the legal and procedure formalities the merit list was prepared and selection of the candidate was carried out vide Endst No.18781-89/59 dated 08.06.2020. **(Copy of order dated 08.06.2020 is attached as Annexure "C")**.
4. That being aggrieved from the above said order dated 08.06.2020 the petitioner approached respondent No.3 for redressal of his grievances against merit list and respondent No.3 issued a corrigendum vide office order No.19090-98/59 dated 03.07.2020 in continuation of Endst No.18781-89/59 dated 08.06.2020 and appointed the petitioner as Theology Teacher as mentioned at serial No.6. **(Copy of appointment order /corrigendum is attached as Annexure "D")**.
5. That as per departmental requirement/legal requirement the petitioner fulfilled the legal requirements including Medical, Charge Report, Arrival Report, duty Certificate, Service Certificates/opening of Bank Account report dated 04.07.2020, peroll registered No.951668, Bank

ATTESTED

EXAMINER

Peshawar High Court

Account Cheque of BoK, employ Master File creation form TR No.339 dated 21.09.2020, personal data information form organizational assignment, permanent address info, recurring payment and allowances and was duly signed by the respondent No.3. **(Copies of the Relevant documents are attached as Annexure "E" to "P").**

6. That now the petitioner is working in Govt Primary School Wazir Dhand District Khyber and performing his duties with zeal and honesty till now. **(Copy of School staff Attendance Registered for October 2020 is attached as Annexure "Q").**
7. That the petitioner approached respondent No.5 regarding his salaries but the petitioner become surprise to know when asked the respondent No.5 that the salary of the petitioner was stopped by the respondent No.3 vide office order dated 12.10.2020. **(Copy of office order dated 12.10.2020 is attached as Annexure "R").**
8. That till filing of the writ petition the petitioner has performing his duties but the respondent No.3 has illegally stopped/freeze the salary of the petitioner without any legal justification. **(Copy of duty certificate in original is attached as Annexure "S").**

ATTESTED

EXAMINER
Peshawar High Court

- 39
- 4
9. That feeling aggrieved from the act and omission of the respondent No.3, petitioner filed an application dated 23.10.2020 before the Respondent No.3 regarding the release of salary but in vain. **(Copy of application dated 23.10.2020 is attached as Annexure "T")**.
10. That the application of the petitioner have been turned down with deaf ear without passing any speaking order by the respondent No.3 and petitioner having no other adequate and efficacious remedy just to invoke the jurisdiction of this Hon'ble Court on the following grounds inter alia;

GROUND:-

- A. That the act and omission of the respondent No.3 to stop the salary of the petitioner despite performing of his duty is against the law and justice.
- B. That petitioner have been legally appointed and proper arrival and charge report and all legal formalities have been carried out by the Department but surprisely the salary has been stopped without any legal justification.
- C. That petitioner is regularly performing his duties and till filing of the writ petition the petitioner have make attendance in his station school and salary has been stopped which is unlogical.

ATTESTED

EXAMINER
Peshawar High Court

33

5

- D. That act of the respondent is illegal against the law and procedure and without jurisdiction by depriving the petitioner from his legal rights.
- E. That petitioner is made escape goat in the instant case and no opportunity of hearing has been given to the petitioner by keeping in view the principle of "audi-alterum-partum".
- F. That each and every citizen of Pakistan shall be treated under article 25 of the constitution of Islamic Republic of Pakistan 1973 and no one should be discriminated on the basis of equality.
- G. That any other ground will be raised at the time of arguments with the prior permission of this Hon'ble Court.

Therefore, it is humbly submitted that on acceptance of the instant writ petition the order dated 12.10.2020 of respondent No.3 may kindly be set aside and salary of the petitioner may kindly be released with immediate effect in the best interest of justice.

To grant any other relief to which petitioner is deemed fit in law, justice and equity.

ATTESTED

EXAMINER
Peshawar High Court

INTERIM RELIEF:-

By way of interim relief, the respondents may kindly be restrained from any kind of adverse action against the petitioner, till the final disposal of the case.

Petitioner

Through

Sajjad Hussain Shinwari

Advocate, High Court

Cell#0345-9096336

Dated 29/10/2020

CERTIFICATE:-

Certified on instructions of my client that petitioner has not previously moved this Hon'ble Court under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 regarding the instant matter, thus the tiled Writ Petition may kindly be fixed before the Worthy D.B of this Hon'ble Court.

LIST OF BOOKS

1. Constitution of Islamic Republic of Pakistan
2. Any other law book as per need.

ADVOCATE

Sajjad Hussain Shinwari
MA, LLB, Advocate High Court Peshawar
Federal Shariat Court of Pakistan Islamabad

ADVOCATE

Sajjad Hussain Shinwari
MA, LLB, Advocate High Court Peshawar
Federal Shariat Court of Pakistan Islamabad

ATTESTED

EXAMINER
Peshawar High Court

35

7

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR

W.P No. _____/2020

Najeeb Ullah S/O Wadan Shah R/O Sheikh Mal Khel,
Landi Kotal presently serving as TT Teacher in GPMS
Wazir Dhand Jamrud District Khyber

.....**Petitioner**

VERSUS

Gout of Khyber Pakhtunkhwa through Chief
Secretary, Civil Secretariat, Peshawar and others

.....**Respondents**


AFFIDAVIT

I, Najeeb Ullah S/O Wadan Shah R/O Sheikh Mal
Khel, Landi Kotal presently serving as TT Teacher in
GPMS Wazir Dhand Jamrud District Khyber,
(**Petitioner**), do hereby solemnly affirm and declare
on oath that the contents of the accompanying **Writ
petition** are true and correct to the best of my
knowledge and belief and nothing has been
concealed from this Hon'ble Court.

Identified by


DEPONENT

CNIC#21203-1903637-9 ✓
Cell#0301-8851522


Sajjad Hussain Shinwari
Advocate High Court
Peshawar

Sajjad Hussain Shinwari
MA, LLB, Advocate High Court Peshawar
Federal Shariat Court of Pakistan Islamabad

11739

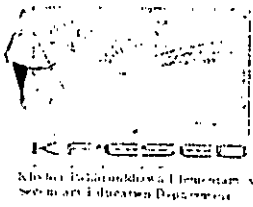
Oct
Wadan Shah

29 ✓
Najeeb Ullah
Khyber
Sajjad Hussain

ATTESTED

EXAMINER
Peshawar High Court


Nadra verified



Annex I

District Education Office
Tribal District Khyber at Jamrud
Phone. 091-5820023 Fax 091-5820023

No. _____
Dated: 2020/12/05

OFFICE ORDER

Consequent upon the recommendation of the of the inquiry committee constituted vide this office letter No. 21238-42 dated :15/10/2020, the following amendments have been made in the office order issued vide this office letter No.19090-98/59No.s/Male/TI/Khyber dated:03/7/2020 with immediate effect in the interest of public service.

S.No	R#	Name	F/Name	Score	School code	School Name	CNIC#	Remarks
01.	63173	Najeeb Ullah	Wadan Shah	100.99	32648	GPS Asif Killi Loi, Shalman LKL	21203-1003637-9	Withdrawn S.No.1 in the office order letter No. 21238-42 mentioned above w.e.f its issuance on 15/10/2020.
02.	63006	Muhammad Ilyas	Nasrullah Khan	118.23	32648	GPS Asif Killi Loi, Shalman LKL	21201-9204435-5	Restored at his original station/school as vide this office letter Endst:No.1878180/59No.s male TI/Khyber dated 03/6/2020.
03.	63326	Iltaf Khan	Muhammad Ibrahim	101.46	32656	GPS Sainsai Minadar LKL	21203-6781087-7	Restored against S.No.1 at his original station/school as vide this office letter Endst:No.1878180/59No.s male TI/Khyber dated 03/6/2020.

Sd.
Nisar Muhammad
DISTRICT EDUCATION OFFICE
DISTRICT KHYBER AT JAMRUD

Endst: 21982-91

Dated: 05/12/2020

Copy to the

1. Director Education E & SED Khyber Pakhtunkhwa at Peshawar.
2. Deputy Commissioner Khyber at Peshawar.
3. District Health Officer Khyber.
4. Principals/Head Masters concerned.
5. District Accounts Officer Khyber at Jamrud.
6. Superintendent local office.
7. EMIS local office.
8. ASDEOs Local Office/Pay Clerk concerned.
9. Officials Concerned.

Attested
[Signature]
DISTRICT EDUCATION OFFICE
DISTRICT KHYBER AT JAMRUD

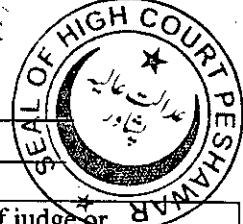
Annexen

(J)

(38)

PESHAWAR HIGH COURT, PESHAWAR
FORM "A"
FORM OF ORDER SHEET.

Court of _____
Case No _____



Serial No of order or proceeding	Date of Order or Proceeding	Order or other proceedings with Signature of judge or Magistrate and that of parties or counsel where necessary
1	2	3
	08.12.2020	<p><u>W.P No. 5019-P/2020</u></p> <p><u>Present:-</u> Syed Sajjad Hussain Niazi, advocate for petitioner.</p> <p>Barrister Babar Shehzad Imran, AAG with Mr. Nisar Muhammad District Education Officer, Khyber, and Ikramullah Asst: Accounts Officer, Jamrud.</p> <p>*****</p> <p><u>MUHAMMAD NAEEM ANWAR.J.</u> The latter produced office order dated 05.12.2020 whereby appointment order of the petitioner is withdrawn. When confronted with this order, learned counsel for petitioner seeks withdrawal of this petition in order to impugn the said order. Dismissed as withdrawn.</p> <p style="text-align: right;">JUDGE</p> <p style="text-align: right;">JUDGE</p> <p>Announced. Dated. 08.12.2020.</p>

[Handwritten Signature]
CERTIFIED TO BE TRUE COPY

EXAMINER
Peshawar High Court, Peshawar
Authorised Under Article 87 of
The Constitution of Pakistan 1973

23 DEC 2020

D.B Hon'ble Mr. Justice Ijaz Anwar and Hon'ble Mr. Justice Muhammad Naeem Anwar.

ATTESTED

EXAMINER
Peshawar High Court

9

No. 22/66
Date of Presentation of Application 22/12/2022
No of Pages 4
Copying fee _____
Total 36/-
Date of Preparation of Copy 22/12/2022
Date of Delivery of Copy 23/12/2022
Received By _____

محترم جناب ڈائریکٹر صاحبہ ایلٹیمیٹ ایڈ سیکنڈری ایجوکیشن فیبرہ کوٹوالہ

(K)



جناب عالی ا
(ایڈیشن مزاحمتی)


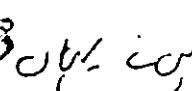
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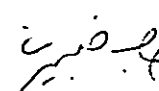
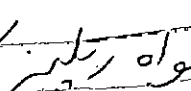
1) مفویانہ گزارش ہے کہ آدھ ہاؤس کے سامنے چند گزار شاہ کھینچنے کی ضرورت ہے۔
03/07/2020 پر میری ایوانٹینٹ صورتی

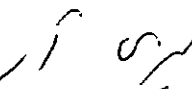
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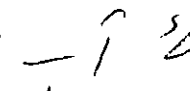
2) 08/12/2020 تک مسلسل ڈیوٹی (تا چلا آ رہا ہوں)

3)  سے کسی  بھی ملی ہے

4)  کی آئی جس کے لئے میں یہاں  سے درخواست میں اس کی
نہیں جو متعلقہ ادارے کو بھیج دی گئی تھی

5) D.E.O. فیبرہ  ڈائریکٹر کی اجازت  کو

سابق تاریخ 05/12/2020 کو میری آرڈر  کی ہے

لینڈ آف - یہاں سے التماس ہے کہ میرے ساتھ جو ظلم اور
نا انصافی ہوئی ہے اس کی تلافی کے لئے آدھ ہاؤس  کو

عین توازن فرم ہوگی

DA/supt
19/12/2020
3516

الحاصل

بخدمت جناب اللہ ولد ودان شاہ
0301-8851522

Diary No. 3516
Dated 9/12/20
Directorate of Education
Merged Areas RPK Peshawar

Attested




Annex
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390

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar
PH No. 091-9210389, 9210938,
091-9210437, 9210957, 9210468
Fax 091-9210936

NOTIFICATION.

1. Whereas the DEO Khyber withdrew the appointment order in respect of Mr. Najeebullah S/O Wadan Shah being the lowest scorer vide office order issued under Endst: No. 21982-91 dated 5/12/2020.
2. And whereas Mr. Najeebullah S/O Wadan shah submitted an appeal to Director E&SE, KPK Peshawar (appellate authority) to conduct an enquiry in the instant case vide date 9.12.2020.
3. And whereas Director E&SE, KPK Peshawar appointed an inquiry officer in the said appeal vide Notification No. 6966-69 dated 16.12.2020.
4. And whereas the inquiry officer submitted his inquiry report in the instant appeal vide No. 2634-35 dated 22.2.2021, wherein the appeal of the appellant has been recommended to be regretted as at the lowest score of the score bearer.
5. Now therefore the evidence available on record and keeping in view the recommendation of the enquiry officer the appeal in respect Mr. Najeebullah S/O Wadan Shah is hereby regretted.

DIRECTOR
Elementary & Secondary Education
KPK Peshawar.

Endst: No. 306-29/-

Dated Pesh: the 8/3 /2021.

Copy of the above is forwarded to the :-

1. District Education Officer, Khyber.
2. Addl; Director (Estt;), Local Office.
3. Mr. Najeebullah S/O Wadan Shah District Khyber,
4. PA to Director, E&SE KPK Peshawar.

Deputy Director (Estt;).

~~AD~~

وکالت نامہ

بعدالت صاحب شریک حوالہ سوس لٹریچر لٹریچر

بخدمت محترمہ فیضیہ خواجہ وغیرہ

منجانب امین الرحمن یوسفزئی دعویٰ اجرم سرسوالہ

تھانہ ایف آئی آر تاریخ

باعث تحریر آنکھ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی بمقام امین الرحمن یوسفزئی ایڈووکیٹ ہائی کورٹ فیڈرل شریعت کورٹ آف پاکستان اینڈ سجاد احمد محسود ایڈووکیٹ ہائی کورٹ

کو بدین شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا اگر پیشی پر من مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے کسی اور جگہ یا پکھری کے مقررہ اوقات سے پہلے یا پیچھے یا بزور تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ اگر مقدمہ علاوہ صدر مقام پکھری کے کسی اور جگہ ساعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر من مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پرداختہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجرائے ڈگری و نظر ثانی اپیل و نگرانی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجرا کرانے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپرد تالی و راضی نامہ کو فیصلہ برخلاف کرنے، اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوفی ڈگری یکطرفہ درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از اجراء ڈگری بھی موصوف کو بشرط ادا نیگی علیحدہ مختار نامہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا اس کے کسی جزوی کارروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے کسی دوسرے وکیل یا ایئر سٹر کو بجائے اپنے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو ہر امر میں وہی اور ویسے ہی اختیارات حاصل ہوں گے۔ جیسے کہ صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا۔ وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا یہ مختار نامہ لکھ دیا کہ سند رہے مورخہ 29/3/2021 مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

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