

SA No. 68/2019

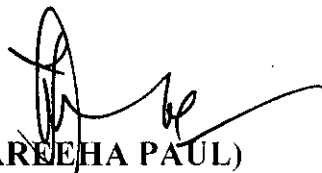
24th Jan., 2023


Appellant present in person. Mr. Muhammad Adeel Butt,
Additional Advocate General for the respondents present.

Appellant submitted an application for withdrawal of the appeal
on the ground that his grievance has been redressed. Application is
placed on file. In view of the above, the appeal in hand is dismissed
as withdrawn. Consign.

**Pronounced in open Court at Camp Court, Abbottabad and
given under my hand and the seal of the Tribunal on this 24th
day of January, 2023.**

SCANNED
KFST
Peshawar.


(FAREEHA PAUL)
Member(E)
(Camp Court A/Abad)

19.8.27 This case is joined for 24.1.23
for the same. 

18.01.2022

Clerk of learned counsel for the appellant present and requested for further time to deposit security and process fee.

The appellant is directed to deposit requisite security and process fee within a week, there-after notices be issued to the respondents for submission of written reply/comments before the S.B on 19.04.2022 at Camp Court Abbottabad.

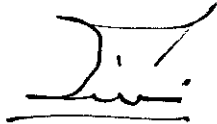


(Salah-ud-Din)
Member (J)
Camp Court A/Abad

19.04.2022

Nemo for the appellant. Security and process fee have not been deposited by the appellant, therefore, notice be issued to appellant as well as his counsel through registered post and to come up for further proceedings on 17.06.2022 before the S.B at Camp Court Abbottabad.

سید احمد علی
میرزا



(Salah-Ud-Din)
Member (J)
Camp Court Abbottabad

16.06.2022

None present on behalf of appellant.

Security and process fee was not deposited. Despite directions notice was not issued to appellant/counsel. Therefore, fresh notice be issued to appellant/counsel to deposit security and process fee within 10 working days of the receipt of notice. Where-after, notice be issued to respondents for submission of reply/comments. To come up for reply/comments on 19.08.2022 before S.B at Camp Court, Abbottabad.

SCANNED
KPST
Peshawar



(Fareeha Paul)
Member (E)

14.07.2021


Due to COVID-19, tour to Abbottabad has been cancelled, therefore, case to come for the same as before on 15.10.2021.


Reader

15.10.2021

Nemo for the appellant.


Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel and to come up for preliminary hearing before the S.B on 30.11.2021 at Camp Court Abbottabad.


(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT ABBOTTABAD

30.11.2021

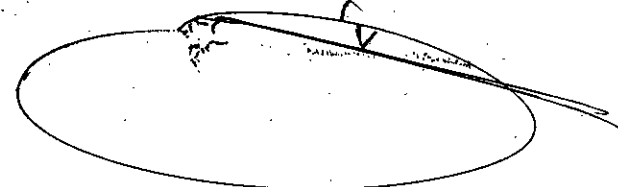
Learned counsel for the appellant present. Preliminary arguments heard.

Points raised need consideration, hence the appeal is admitted to regular hearing subject to all legal objections including the question of limitation. The appellant is directed to deposit security and process fee within 10 days, where-after notices be issued to the respondents for submission of written reply/comments on 18.01.2022 before the S.B at Camp Court Abbottabad.


(Salah-Ud-Din)
Member (J)
Camp Court Abbottabad


18.09.2020

Appellant Bahadur Khan has not forth come despite repeated calls at different intervals since morning, the last call was made at 12:26 P.M but no one appeared on his behalf. A cursory look at the preceding order sheet reveals that the appeal was adjourned twice due to spread of COVID-19, therefore, it is deemed appropriate to issue appellant and his respective counsel notice for appearance for 14.12.2020. File to come up for preliminary hearing before S.B at Camp Court, Abbottabad.



(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT ABBOTTABAD

*Due to COVID-19 case is
adjourned to 17-03-2021*



17.03.2021

Nemo for appellant.

Preceding date was adjourned on a Reader's note, therefore, appellant/counsel be put on notice for 14/7/2021 for preliminary hearing, before S.B at Camp Court, Abbottabad.



(Rozina Rehman)
Member (J)
Camp Court, A/Abad

22.11.2019

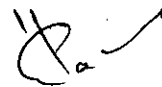
Clerk to counsel for the appellant present and submitted application for adjournment, placed on file of connected service appeal No.67/2019, with the request that next date may be fixed after 15.01.2020. Adjourn. To come up for preliminary hearing on 20.01.2020 before S.B at Camp Court, A/Abad. Last opportunity is granted.



Member
Camp Court, A/Abad

20.01.2020

Clerk to counsel for the appellant present and seeks adjournment as learned counsel for the appellant is not available. Adjourn. To come up for preliminary arguments on 21.02.2020 before S.B at Camp Court Abbottabad.



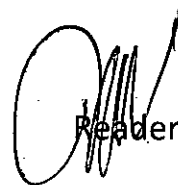
Member
Camp Court, Abbottabad

Due to covid ,19 case to come up for the same on / /
at camp court abbottabad.

Reader

Due to summer vacation case to come up for the same on

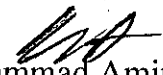
18 / 9 / 20 at camp court abbottabad.



Reader


24.05.2019

None present on behalf of the appellant. Notice be issued to appellant and his counsel for preliminary hearing for 09.07.2019 S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad


09.07.2019

Counsel for the appellant present and requested for adjournment. Adjourned to 16.09.2019 for preliminary hearing before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

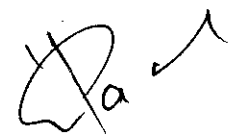
16.09.2019

Clerk of counsel for the appellant present and requested for adjournment on the ground that learned counsel for the appellant is not available today. Adjourned to 24.10.2019 for preliminary hearing before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

24.10.2019



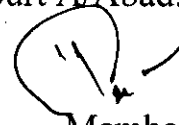
Appellant present in person. Counsel for the appellant is not present. Appellant requested for adjournment. Adjourn. To come up for preliminary hearing on 22.11.2019 before S.B at camp court, Abbottabad.


Member
Camp court, A/Abad

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 68/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/1/2019	<p>The appeal of Mr. Bahadar Khan presented today by Mr. Masood-ur-Rehman 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 15/1/19</p>
2-	25-1-19	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>22-3-19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	22.03.2019	<p>Appellant absent. Learned counsel for the appellant absent. Adjourn. To come up for preliminary hearing on 24.05.2019 before S.B at Camp Court A/Abad.</p> <p style="text-align: right;"> Member Camp Court A/Abad</p>

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

**SCANNED
KPST
Peshawar**

Service Appeal No. 68 /2019

Bahadur Khan son of Ali Gohar Khan, PST Government Primary School
Kanai, District Battagram.

....APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary
Education, Khyber Pakhtunkhwa, Peshawar & others.

....RESPONDENTS

SERVICE APPEAL

APPLICATION FOR CONDONATION OF DELAY

Respectfully Sheweth;-

The petitioner humbly submit as under;-

1. That the service appeal is going to be filed before this Honourable Tribunal today.
2. That after the rejection of departmental appeal of appellant on 25/10/2018 the appeal in hand is with time if found otherwise not within time the appellant seeks condonation of delay;-
 - (a). That the delay is not deliberate.
 - (b). That the act of respondents towards appellant was not positive.
 - (c). That the order originally passed for termination of appellant is void order and

under the law no limitation run against such order.

- (d). That the valuable rights of petitioner is involve in the matter in hand, keeping in view of the length of service of petitioner/ appellant more then 25 years.
- (e). That the manner in which the order was passed is against the settled principle of natural justice.
- (f). That the miscalculation and non awareness, of law keeping in view the poor condition of appellant is also the valid factor.
- (g). Some other points will be urged at the time of arguments.

Keeping in view the above cited submission, it, therefore, humbly prayed that by acceptance of this petition the delay may kindly be condone.

Dated: _____/2019

Through

.....ARPELLANT

(MALIK MASOOD UR REHMAN AWAN)

Advocate Supreme Court of Pakistan

AFFIDAVIT:-

I, Bahadur Khan son of Ali Gohar Khan, PST Government Primary School Kanai, District Battagram, do hereby solemnly affirm and declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable court.



DEPONENT

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. 68 /2019

Bahadur Khan son of Ali Gohar Khan, PST Government Primary School
Kanai, District Battagram.

....APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary
Education, Khyber Pakhtunkhwa, Peshawar & others.

....RESPONDENTS

SERVICE APPEAL

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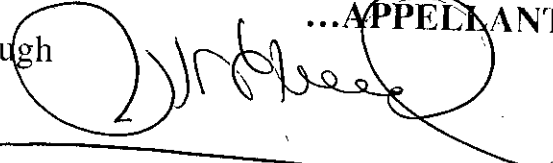
S.#	Description	Page No.	Annexure
1.	Service appeal along with affidavit	1 to 10	
2.	Copy of order	11 to 14	"A"
3.	Copy of order dated 28/07/1997	15 to 26	"B"
4.	Copy of order is appended herewith	27 to 29	"C"
5.	Copy of sack employees Act	30 to 35	"D"
6.	Copies of educational testimonials and service book	36 to 45	"E"
7.	Copy of writ petition alongwith order	46 to 57	"F"
8.	Copy of order	58 to 60	"G"
9.	Copy of judgment/order passed in COC petition referred above	61 to 68	"H"
10.	Copy of attendance register	69 to 79	"I"
11.	Copy of the order is appended herewith with postal receipt	80 to 84	"J" & "K"
12.	Copy of department appeal and order	85 to 95	"L" & "M"
13.	Wakalatnama	96	

ابن

....APPELLANT

Dated: _____/2019

Through


(Malik Masood-ur-Rehman Awan)
Advocate Supreme Court of Pakistan

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. 68 /2019

Bahadur Khan son of Ali Gohar Khan, PST Government Primary School
Kanai, District Battagram.

....APPELLANT
Khyber Pakhtunkhwa
Service Tribunal

Diary No. 65

Dated 15/01/2019

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
3. District Education Officer, Battagram.
4. District Accounts Officer Battagram.

....RESPONDENTS

Filed to-day

Registrar

15/1/19

SERVICE APPEAL UNDER SECTION 4 OF KPK
SERVICE TRIBUNAL ACT, 1974, FOR
DECLARATION TO THE EFFECT THAT ORDER
NO.1305-10/EB/PRY/SACKED EMPLOYEES DATED
31/01/2018 PASSED BY THE RESPONDENT NO. 3
WHEREBY THE SERVICES OF THE APPELLANT

WAS TERMINATED, IS ILLEGAL, UNLAWFUL, AGAINST THE LAW, ARBITRARY, PERVERSE, FANCIFUL, RESULT OF MALAFIDE, ILLEGAL EXERCISE OF POWERS AND INEFFECTIVE UPON THE RIGHTS OF THE APPELLANT.

=====

PRAYER: ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, BY SETTING ASIDE THE IMPUGNED ORDER NO.1305-10/EB/PRY/SACKED EMPLOYEES DATED 31/01/2018, THE RESPONDENTS BE DIRECTED TO REINSTATE THE APPELLANT IN SERVICE WITH ALL BACK BENEFITS. ANY OTHER RELIEF DEEMED FIT AND PROPER IN THE CIRCUMSTANCES OF THE CASE.

=====

Respectfully Sheweth: -

1. That the appellant was appointed in respondents department as PTC Teacher vide office order No. 1546-61 dated 22/11/1994. Copy of order is annexed as Annexure "A".
2. That after rendering 5/6 years of service, the appellant was terminated during the year 1997.

Copy of order dated 28/07/1997 is annexed as Annexure "B".

3. That after the change of political scenario, the Govt. introduced **Sack Employees Reinstatement Act, 2010, amended 2013** and in view of the aforesaid Act, the services of appellant was reinstated vide office order No. 7825-31 dated 15/02/2013. Copy of order is appended herewith as Annexure "C".
4. That at the time of reinstatement, condition as per reinstatement office order at Para-7, which was contrary to the afore-referred Sack Employees Act, 2013. Regarding improvement of educational qualification was imposed. Copy of sack employees Act is appended herewith as Annexure "D".
5. That even then, the appellant improved his educational qualification prior in time, which were duly incorporated in the service book of appellant. Copies of educational testimonials and ~~Service~~ ~~book~~ are attached as Annexure "E".

6. That during the month of September of 2016, when the monthly salary of the appellant was stopped without any notice, then appellant firstly approached to the concerned departmental head, EDO Battagram, and thereafter having failed, approached to the Honourable Peshawar High Court, Abbottabad Bench through a writ petition No. 1038-A/2016, where the Honourable High Court not only issued the restraining order against the department but also later on, allowed the writ petition by issuing direction to the worthy Secretary Education. Copy of writ petition alongwith order is appended herewith as Annexure "F".

7. That where-after the worthy Secretary Education while holding a meeting in light of the judgment of Honourable Peshawar High Court, Abbottabad Bench, issued direction to the respondent No.3 for making a uniform policy for redressing the grievance of appellant and others vide order dated 14/02/2017. Copy of order is attached as Annexure "G"

8. That where-after when the matter was pending with respondent No. 3 and after the expiry of time set up by the Honourable Peshawar High Court, the appellant filed COC Petition No. 25-A/2017 where the Honourable Peshawar High Court issued the direction for implementation of the order passed in writ petition No. 859-A/2016 dated 14/02/2017, strictly with the judgment / order passed in afore referred writ petition. Copy of judgment/order passed in COC petition referred above is appended herewith as Annexure "H".

9. That the appellant performed his duty upto the month of January, 2018, where his attendance at the station is duly marked and checked by the officer concerned. Copy of attendance register is appended herewith as Annexure "I".

10. That now when the EDO concerned/respondent No. 3 inspite the undertaking before the court that he will implement the direction/judgment and order of Honourable Peshawar High Court, Abbottabad Bench, but since no order was passed/communicated to the appellant. The appellant again filed a COC petition vide No. 19-

A/2018 before Honourable Peshawar high Court where he came to know that an order dated 31/01/2018 thereby terminating the services of appellant has been passed behind the back of appellant which was later on 03/03/2018 was communicated to the appellant through post. Copy of the order is appended herewith with postal receipt are annexed as Annexure "J" & "K".

11. That feeling aggrieved, the appellant preferred an appeal to the respondent No. 1 on 16/03/2018 which was rejected on 26/09/2018 and the said order was communicated to the appellant on 25/10/2018. Copy of department appeal and order are annexed as Annexure "L" & "M".
12. That by now feeling still aggrieved after the rejection of departmental appeal vide order dated 26/09/2018 against termination order dated 31/01/2018 the instant service appeal is being filed, assailing the same being unwarranted at law and facts inter-alia on the following:-

GROUNDS; -

- a. That the order regarding the termination of appellant is totally against the Reinstatement of Sack Employees Act, 2013, which reveals that no condition can be imposed upon the any Employees while reinstating his services.
- b. That the appellant challenged the above condition set in Para-7 of his reinstatement order before the Honourable Peshawar High Court, Abbottabad Bench vide W.P No. 859-A/2016 dated 14/02/2017, where the Honourable Peshawar High Court, allowed the writ petition and issued direction for making a uniform policy for reinstatement of Sack Employees Act by comparing the reinstatement order of other districts, where no such condition was impose.
- c. That even in order to fulfill the above condition, the appellant improved his education prior in time and whereafter he submitted his educational certificates, /

Sanad Degree to the concerned office which has taken its effect in service book of appellant.

- d. That the order under appeal is also against the judgment / order / direction passed in COC petition as well as the direction issued by the respondent No. 1 to the respondent No. 3.
- e. That the order under appeal regarding the termination of services of appellant is tainted with malafide and has been passed in back date just in order to infringe the right of appeal or any other right remedy to the appellant.
- f. That the impugned order is illegal, unlawful, without jurisdiction, arbitrary and perverse. Hence, liable to be set aside.
- g. That when the Honourable High Court has issued direction, the respondent No. 3 was duty bound to implement the same. Besides, the respondent No. 1 has also issued

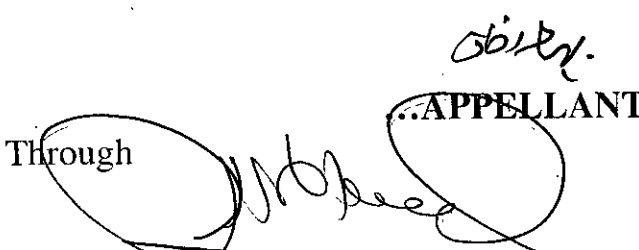
directions to the respondent No.3 but both the directions were dealt so casually, calling immediate reversal by respondent No.1.

- h. That after the communication of order to the appellant/knowledge, the instant appeal is being filed.

It is, therefore, humbly prayed that on acceptance of the instant appeal, the impugned order may graciously be set-aside and appellant be ordered to be reinstated in service with all back benefits. Any other relief deemed fit and proper in the circumstances of the case

Dated: _____/2019

Through


(Malik Masood-ur-Rehman Awan)
 Advocate Supreme Court of Pakistan

گیتہ
 ...APPELLANT

VERIFICATION:

Verified on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

گیتہ
 ...APPELLANT

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

Service Appeal No. _____/2019

Bahadur Khan son of Ali Gohar Khan, PST Government Primary School
Kanai, District Battagram.

....APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary
Education, Khyber Pakhtunkhwa, Peshawar & others.

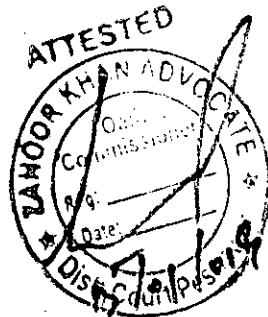
....RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Bahadur Khan son of Ali Gohar Khan, PST Government Primary School
Kanai, District Battagram, do hereby solemnly affirm and declare that the
contents of foregoing appeal are true and correct to the best of my
knowledge and belief and nothing has been concealed therein from this
Honourable Court.

Obi. Khan
DEPONENT



12

A

OFFICE OF THE DISTRICT EDUCATION OFFICER (M.A.E.) BATTAGRAM
APPOINTMENT

O.O. NO-27
DATE 22.11.94
Consequent upon selection/recommendation of untrained candidates are hereby appointed against the vacant post of primary teacher (Rs:1480/- P.F. fixed plus usual allowances as admissible under the rules w.e.f the date of his taking over charge in the interest of public service.

No.	Name, father's name & address.	SCHOOL, where apptt.	Remarks.
1.	Baz Mohd s/o Hazrat Hussain r/o Shalkhey.	Mos: Nasirabad.	AG: V. Vac.
2.	Mohd Sultan s/o Ghazi r/o Banwali.	Mos: Banwali.	AG: B. Vac.
3.	Mudrat Ali Shah s/o Nawab Shah r/o Cham.	GFS: Gidri.	AG: L. Vac.
4.	H. Shirin s/o H. Hijab r/o Hutel.	GFS: T/Banda.	-do-
5.	Tawraiz Khan s/o Sultan Khan r/o Sh: Paee.	GFS: Hutel.	-do-
6.	Shahid Khan s/o Khuda Khan	GFS: Hutel	-do-
7.	H. Shafiq s/o Mafizullah r/o Kadlo.	GFS: Gat Haroon.	A.L. Vacy;
8.	Fida Mohd s/o Fazlur Rehman r/o Trand.	GFS: Gidri Trand.	-do-
9.	Bahader Khan s/o Ali Geher Khan r/o Dharial.	Mos: Kiar Gali U.K.	-do-

Terms & Conditions

- Charge report should be sent to all concerned, & No TA/DA is allowed.
- The apptt: is purely temporary and liable to termination at any time with out assigning any reason or notice.
- In case of resignation they will have to submit one month prior notice to the department or forfeited one month pay to Govt.
- They are required to produce Health and age certificate from the M/S concerned before the charge in case of they are not Govt: servants.
- They are not allowed to t/o charge if their age is less than 18 and more than 25 years, age relaxation for 3 years upto January 2000, has been granted for Distt: Battagram vide Notification No-471SO/TA-II(ED) 94, dated 27.9.1994 and age relaxation for 2 years granted vide H'le Chief Minister, w/r, No-203-III/S&GAD, dated 9.4.1994, from 18.7.1994.
- All original documents, i.e. Edu: Characters, and Domicile certificate's must be verified by the Head of instt: and one set of each may be sent to this office before the Handing over charge.
- If they fail to T.O.C. of the post with in 15 days from the issue of this order the apptt: will be automatically considered as cancelled.
- Apptt: ag: leave vacy: is for stop gap arrangement.
- & will be automatically cancelled on the arrival of Original Teachers.

(FARAL-E-MEHMOOD KHAN)
DISTRICT EDUCATION OFFICER
(M.A.E.) SECONDARY BATTAGRAM

Dist: No 1545-61 / P. No. LV/EB, apptt: of PT, dated, 22-11-1994
Copy for information to the:-
Director Primary Education NWFP (Hayatabad) Peshawar.
S to H'le Minister for Pny: Education NWFP, w/r to his recommendation approval letter No-111 dated 19.11.1994.
Sub: Divisional Education Officer (M) Battagram.
District Account Officer Battagram.
Office order file.

DISTRICT EDUCATION OFFICER
(M.A.E.) SECONDARY BATTAGRAM

22/11/94

A

13

OFFICE OF THE DIRECTOR EDUCATION OFFICER (M)
SECONDARY M&F B/RAM

APPOINTMENT

Consequent upon selection/ recommend _____
22/11/1994 selection committee the following (male) untrained candidates
are bere by appointed against the vacant lost of primary teacher Rs. 1480/
P.M fixed plus usual allow: us admissible under the rules w.e.f the date of
his taking over charge in the interest of public service.

S. No.	Name, father's name & address,	School, Where	Apptt	Remarks.
1.	Baz Mohd s/o Hazrat Hussain r/o Shalkhey. AG/Vacy		Mos: nasirabad,	
2.	Mohd Sultan s/o Ghazi r/o Banwali. AG/Vacy		Mos: Banwali.	
3.	Qudras Ali shah s/o Nawab Shah r/o Cham. AG/Vacy	KB	GPS: Gidri.	
4.	M. Shirin s/o M. Hijab r/o Hutel.		GPS: T/Banda.	-do-
5.	Tamraiz Khan s/o Sultan Khan, r/o Sh:Paee. AG/Vacy		GPS: Hutel	
6.	jkhjkh			
7.	M. Shafiq s/o Hafizullah r/o Kadlo.		GPS: Gat Haroon	-do-
8.	Fida Modh s/o Fazlur Rehman r/oTrand.		GPS: Gidri Trand.	AVP
9.	Bahader Khan s/o Ali Gohar Khan r/o Dhariel.		Mos: Kiar Gali U.K	-do-

TERMS & CONDITIONS

1. Charge report should be sent to all concerned &, No TA/DA is allowed.
2. The apptt: is purely temporary and liable to termination at any time with out assigning any reason or notice.
3. In case of resignation they will have to submit one month prior notice to the department or forfeited one month pay to Govt.
4. They are required to produce Health and age certificate from the M/S concerned before the charge in case of they are not Govt: servants.
5. They are not allowed to t/o charge if their age is less than 18 and more than 25 years, age relexation for 3 years upto January 2000, has been granted for Distt: Battagram vide Notification No. 41/ISO/jTA-II(HD) 94 dated 237/09/1994 and age relexation for 02 year granted vide Hile chief minister

18

NWFP 41/ISO/jTA-II(HD), dated 08/04/1994, from 18/07/1994.

6. All original documents the edu: Characters, and Domicile certificate's must be verified by the Head of instt: and one set of each may be sent to this office before the Handing over charge.
7. If they fail to T.O.C of the post with in 95 days from the issue of this order the sptt. Will be automatically considered as concealed.
8. Apptt: ag: leave vacy: is for stop gap arrangement.
9. Will be automatically cancelled on the arrival of original teachers.

(FAZAL-E-MEHMOOD KHAN)
DISTRICT EDUCATION OFFICER
(MALE) SECONDARY BATTAGRAM

Endst: No. 15/06/61/F.No,DV/NB,Apptt: of PT, dated, 22/11/94.

Copy for information to the:-

1. Director Primary Education NWFP (Hayatabad) Peshawar.
2. M/S to H'le Minister for Pry: Education NWFP, W/r to his recommendation approval letter No-Fil dated 19/11/1994.
3. Sub: Divisional Education Officer (M) Battagra.
4. District Account officer Battagram.
5. Office order file.

DISTRICT EDUCATION OFFICER
(MALE) SECONDARY
BATTAGRAM.

18

B

OFFICE OF THE DISTRICT EDUCATION OFFICER (D) PESHAWAR

OFFICE ORDER NO. 277 DATED 27/7/1997

OFFICE ORDER

In the light of findings of the enquiry committee and in compliance with Memo No. F.No. 33/DFE/SEA/H/Abdur Rashid/S&O (H) Primary Education/AD(P&A)-M No. 35499 Dated 29.7.97.

The appointment of the following persons have been found illegal ab initio void and against the prescribed rules. Their services are, therefore, dispensed with with effect from the date of their replacement by those selected on purely merit basis in the light of following the selection procedure as admissible under the rules.

However, they can apply afresh along with others for their selection on merit.

No.	Name of Person	Father's Name	Gender	Name of School
1.	Isa Qadri	Isa Khan	P.T	OPD Sheerikabad.
2.	Shaukat Wahab	Abdul Wahab	"	" Jijbori.
3.	Alam Zaib	Sar Gul Khan	"	" Ghorif Abad.
4.	Fazal Wahab	Abdul Wahab	"	" Sun Haddi.
5.	Usha Ahmar	Rustam Khan	"	" Shawal B.roy.
6.	Azir Zada	Abdul Qudus	"	" Faway, Faway.
7.	Haz Muhammad	Hazrat Muhammad	"	" Nazirabad.
8.	Muhammad Sultan	Uzair	"	" Banwali.
9.	Qudrat Ali Shah	Muhammad Shah	"	" Qidari.
10.	Muhammad Ehsan	Hijab Khan	"	" Tikar Benda.
11.	Farooq Khan	Muhammad Khan	"	" Kuthal.
12.	Muhammad Shafiq	Muhammad	"	" Gat Haroon.
13.	Ishmael	Qul Faraz	"	" Ajaera.
14.	Alam Zaib	Muhammad Khan	"	" Gijbori.
15.	Muhammad	Noorul Hameed	"	" Ruzkhabad.
16.	Volkar Nizam	Dukhtar	"	" Gangwal.
17.	Shaukat Wahab	Muhammad	"	" Gangoo.
18.	Anwar Faraz	Sumanfar Khan	"	" Dardpatti.
19.	Anwar Zamin	Abdus Dattar	"	" Ghurati, Ghurati.
20.	Gul Fiaz	Shah Jehan	"	" Ghinow.
21.	Ibaidur Rahman	Niqah Shah	"	" Rashidabad.
22.	Abdul Razvi	Khatirullah	"	" Soori.
23.	Anwar Zaib	Kanza, Farhad Khan	"	" Hargay.
24.	Muhammad	Muhammad Ullah	"	" Kurag.
25.	Abdul Ghaffar	Muhammad Khan	"	" Buzrai.
26.	Muhammad Usaf	Khan	"	" Koyar.
27.	Abdullah	Muhammad	"	" Shakhay.
28.	Muhammad Ibrahim	Muhammad Ja.	"	" Sarki H. Sarki.
29.	Gul Abbas	Muhammad Khan	"	" Har-Sakarkab.
30.	Muhammad	Muhammad	"	" Lalai.
31.	Muhammad	Muhammad	"	" Qoli Dattogara.
32.	Muhammad	Muhammad	"	" H/ Buzkool.
33.	Muhammad	Muhammad	"	" Akbar, Akbar.
34.	Muhammad	Muhammad	"	" Akay.
35.	Muhammad	Muhammad	"	" Pelay.
36.	Muhammad	Muhammad	"	" Chappal.
37.	Muhammad	Muhammad	"	" do.
38.	Muhammad	Muhammad	"	" Gaural, Gaural.
39.	Muhammad	Muhammad	"	" M.C. Jachai.
40.	Muhammad	Muhammad	"	" Gijbori.
41.	Muhammad	Muhammad	"	" Danday, Danday.
42.	Muhammad	Muhammad	"	" Buzkool.
43.	Muhammad	Muhammad	"	" Akbar, Akbar.
44.	Muhammad	Muhammad	"	" Akay.
45.	Muhammad	Muhammad	"	" Pelay.
46.	Muhammad	Muhammad	"	" Chappal.
47.	Muhammad	Muhammad	"	" do.
48.	Muhammad	Muhammad	"	" Gaural, Gaural.
49.	Muhammad	Muhammad	"	" M.C. Jachai.
50.	Muhammad	Muhammad	"	" Gijbori.
51.	Muhammad	Muhammad	"	" Danday, Danday.
52.	Muhammad	Muhammad	"	" Buzkool.
53.	Muhammad	Muhammad	"	" Akbar, Akbar.
54.	Muhammad	Muhammad	"	" Akay.
55.	Muhammad	Muhammad	"	" Pelay.
56.	Muhammad	Muhammad	"	" Chappal.
57.	Muhammad	Muhammad	"	" do.
58.	Muhammad	Muhammad	"	" Gaural, Gaural.
59.	Muhammad	Muhammad	"	" M.C. Jachai.
60.	Muhammad	Muhammad	"	" Gijbori.
61.	Muhammad	Muhammad	"	" Danday, Danday.
62.	Muhammad	Muhammad	"	" Buzkool.
63.	Muhammad	Muhammad	"	" Akbar, Akbar.
64.	Muhammad	Muhammad	"	" Akay.
65.	Muhammad	Muhammad	"	" Pelay.
66.	Muhammad	Muhammad	"	" Chappal.
67.	Muhammad	Muhammad	"	" do.
68.	Muhammad	Muhammad	"	" Gaural, Gaural.
69.	Muhammad	Muhammad	"	" M.C. Jachai.
70.	Muhammad	Muhammad	"	" Gijbori.
71.	Muhammad	Muhammad	"	" Danday, Danday.
72.	Muhammad	Muhammad	"	" Buzkool.
73.	Muhammad	Muhammad	"	" Akbar, Akbar.
74.	Muhammad	Muhammad	"	" Akay.
75.	Muhammad	Muhammad	"	" Pelay.
76.	Muhammad	Muhammad	"	" Chappal.
77.	Muhammad	Muhammad	"	" do.
78.	Muhammad	Muhammad	"	" Gaural, Gaural.
79.	Muhammad	Muhammad	"	" M.C. Jachai.
80.	Muhammad	Muhammad	"	" Gijbori.
81.	Muhammad	Muhammad	"	" Danday, Danday.
82.	Muhammad	Muhammad	"	" Buzkool.
83.	Muhammad	Muhammad	"	" Akbar, Akbar.
84.	Muhammad	Muhammad	"	" Akay.
85.	Muhammad	Muhammad	"	" Pelay.
86.	Muhammad	Muhammad	"	" Chappal.
87.	Muhammad	Muhammad	"	" do.
88.	Muhammad	Muhammad	"	" Gaural, Gaural.
89.	Muhammad	Muhammad	"	" M.C. Jachai.
90.	Muhammad	Muhammad	"	" Gijbori.
91.	Muhammad	Muhammad	"	" Danday, Danday.
92.	Muhammad	Muhammad	"	" Buzkool.
93.	Muhammad	Muhammad	"	" Akbar, Akbar.
94.	Muhammad	Muhammad	"	" Akay.
95.	Muhammad	Muhammad	"	" Pelay.
96.	Muhammad	Muhammad	"	" Chappal.
97.	Muhammad	Muhammad	"	" do.
98.	Muhammad	Muhammad	"	" Gaural, Gaural.
99.	Muhammad	Muhammad	"	" M.C. Jachai.
100.	Muhammad	Muhammad	"	" Gijbori.

Asst Dist Officer (D) Peshawar

Dist Officer (D) Peshawar

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PAGE NO. 2.

✓ Duraj Khan	Habib Khan	IT	MSQ: Dorak H. Jan.
✓ Said Ali Shah	Said Main	"	Bar Kau P. Singh.
✓ Malik Muhammad	Jalal Khan	"	Gulrehan.
✓ Bhotur Rehman	Azar Dakt	"	H. K.G.S. Hassan.
✓ Inyat ur Rehman	Ali ur Rehman	"	D. Azimullah.
✓ Mir Dwa. d. Khan	Mukim Khan	"	Rashid Abee.
✓ Musin Khan	Huzrat Dalil	"	Hoshkani.
✓ Ghulam Koroog	Ajma Khan	"	H. P. P. P.
✓ M. Bibulish Shah	Tahir Shah	"	H. P. P. P.
✓ Liequat Ali	Ibrahim	"	H. P. P. P.
✓ Siraj Khan	Mian Khan	MSQ	M. Jan Muhammad
✓ Fazl ur Rehman	Abdul Hamid	"	Bara Dhoonga.
✓ K. Javid H. Iqbal	Aurangzaid	"	Dhori. J. J. K.
✓ Nazir Muhammad	Murhad	"	Hajragran
✓ Jahanul Haq	Abdul Anon	"	Falshous.
✓ M. Huz	Ghulam Muhammad	"	Hanifabad.
✓ Aurangzaid Khan	Mindra Khan	"	Kasui Hall.
✓ S. Zuhrob Shah	Fargun Said	"	Kuthora.
✓ Hunir Khan	Gul. Hamroz	"	Barani.
✓ Rustom Khan	Miqra Khan	"	Damgar.
✓ M. Shafiq	Aqiluloh	"	Tubaturuz
✓ Dado Khan	Ali Gohar Khan	"	Mashkanai.
✓ Fida Muhammad	Fazl ur Rehman	"	Kiargali U. Khan.
✓ M. Khalid	Sultan Noor	"	Gidri Trand.
✓ Ibrahim	Hidayatullah	"	K. D. Azimullah.
✓ M. Bolil	Ikhtiar Malook	"	Damgat.
✓ Ahmad Khan	Gul M. Khan	"	Hoshidabad.
✓ Amal Jan	Saitul Haq	"	Gidri Trand.
✓ Yashul. ah	M. Yashid	"	Jaba Teroz.
✓ Zabal Khan	Abee Khan	"	Mundri.
✓ Ghulam Rehmani	Fazl ur Rehman	"	Doodpatti.
✓ Badiur Zaman	Toli Muhammad	"	Taria Hill.
✓ B. Waliab Shah	M. Said	"	Chindow.
✓ Abdul Ali	Abdul Malik	"	Falshous.
✓ Hakin	Abdul Latif	"	Hagh Banda.
✓ M. Javid	Muhammad	"	Chinow.
✓ Mahmood Shah	Said Bahart Shah	"	Dajergan.
✓ Shahzada	Abdul Mateen	"	Pakbanda.
✓ Shaikat Ayaz	Mulak Jan	"	Hanifabad.
✓ Inamullah	Mawa Khan	"	Barsey.
✓ Habibullah	Jumhar Khan	"	Mundri.
✓ Aurangzaid	M. Miskin	"	Dajergan.
✓ Dakt Morin	Muhammad	"	Taria Hill.
✓ Ali Asar Khan	Mian Khan	"	G/Kawab Said.
✓ M. Iqbal	Gul Muhammad	"	Murzala.
✓ Rustom Khan	Talas Khan	"	Trand.
✓ M. Shobid	Abdul Razaq	"	Chappergan.
✓ Attullah	M. Saeed	"	Peshora.
✓ Shah Rozen	Hayat Khan	"	Shalkhay.
✓ Ali Rehman	Umar Khan	"	-do-
✓ Hussain Ahmad	Sherin Khan	"	Walargat.
✓ Bab. Kawaz Khan	Afoor M. Khan	"	Okay.
✓ Farhat Khan	Murad	"	Turbor.
✓ Inyat ur Rehman	Gujar Khan	"	Rashidabad.
✓ Hameyatullah	Shah Zad Khan	"	Shaukat Abee
✓ Noor ul. Yulem	Huzrat Hally	"	S. Khal. Banda
✓ Rustom	Sabir Khan	"	Dabona.
✓ Razrat Islam	M. Zulf	"	Khatono.
✓ Wali Muhammad	Roshan Khan	"	Pak Banda.
✓ M. Javid	Mex Ahmad	"	Muz. Khaysona
✓ Muhammad dir	Mulayudin	"	Thoya.
✓ Nader Khan	Mir Ahmed Khan	"	-do-
✓ Attullah	Muhammad	"	-do-
✓ Talon Shah	Mian Gul Shah	"	-do-
✓ B. Halim Shah	Mutabar Shah	"	-do-
✓ Shahidat	Gul Haz	"	-do-
✓ Saad ur Rehman	Kuchkol Khan	"	-do-
✓ Sadoz Muhammad	Huzrat Younis	"	-do-
✓ Anver Paraz	Abdul Wahab	"	-do-
✓ Shaikat Ali Shah	Noor Khaidun	"	-do-
✓ S. Mukhtiar Ali	hah. Noor Habi.	"	-do-

Cont: P/3

Genl. Dist. Officer (Estt)
(S&L) Dargan

Dist. Dist. Officer (Estt)
(S&L) Dargan

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188. 80....3....

119. ✓ Faiz ul Bari	M. Husein	P. 1	Haji Abai.
120. ✓ Talah Muhammad	Mian Muhammad	"	Gia. Hanga.
121. ✓ Bakhtkhani		"	S. Valer. U. C.
122. ✓ M. Zahid	Mudabbir Gul	"	Khalit. Mulkichah.
123. ✓ Aftakhar Ahmad	M. Roshan.	"	Ohan. Saidon.
124. ✓ Abdul Ghoni Shah	Munawwar Shah	"	G.P. D/Oharri Said.
125. ✓ Saadhi Khan	Payee Khan	"	I. H. Alad.
126. ✓ M. Furhad Shah	M. Zahir Shah	"	A. Darwuli. Taky.
127. ✓ Waheed Khan	Said Ali Khan	"	Daboona.
128. ✓ Hojaul Haq?	Abdul Qoyyus	"	Kashul.
129. ✓ Saio Alad?	Jan Alad.	"	Saproona.
130. ✓ Hizbulah	Astus Khan	"	-do-
131. ✓ Attaulah	Aftab	"	Klashul.
132. ✓ Mehtoozullou	Wali. Walullah	"	Musawrin.
133. ✓ Ejaz Ahmad	M. Zahir Shah	"	Bar. Murin.
134. ✓ Sherin Zada	Ghulam Haider	"	Mushab. Ghadi Yar.
135. ✓ Wazir Muhammad	Fazal Haji	"	-do-
136. ✓ Khurshid Khan	M. Ibrahim	"	Mirkundi.
137. ✓ Niaz Muhammad?	Muhammad Aza Khan	"	Murzala.
138. ✓ M. Iqbal	Aurangzab	"	-do-
139. ✓ S. Mohiullah	M. Ali Shah	"	Ajlo. Nanginabad.
140. ✓ Abu. Hta. Ullah?	Heda Khail	"	Rusli Abad.
141. ✓ Ismail	M. Hussain	"	Shaukat Abad.
142. ✓ Gulzarul Wahab?	Abdul Wahab	"	Kuchal.
143. ✓ Jihan Zaid?	Shah Zada	"	Moadwali.
144. ✓ M. Bashir?	Azimullah	"	Haji.
145. ✓ M. Mumtaz?	Said Ali	"	Ohan Saidon.
146. ✓ M. Shurif	Rehmat Ullah	"	Mil.
147. ✓ M. Khurshid	M. Ayub	"	Daboona.
148. ✓ M. Xaunis?	Ghulua. Mabi	"	Rajurgan.
149. ✓ M. Faris	Pir Muhammad Khan	"	Sari. Ghali Handa.
150. ✓ Khan Mulla pad?	Permaz. Khan	"	Qadul Haza. Abad.
151. ✓ Wabaziz	Abdul Haq	"	Ohan Saidon. Meran
152. ✓ Boz Muhammad?	Amanullah	"	Khalit Alseddin.
153. ✓ Abdul Haq	Sha. ur Khan	"	Mun.
154. ✓ M. Shabir Hussain	Habib Said	"	Boz Wal.
155. ✓ Amir Muhammad	Jan. Muhammad	"	Gundor.
156. ✓ Pervez Khan?	Saif.ullah Khan	"	Danda Battangi.
157. ✓ Inayat ur?	Shaman M. Muddadz	"	Kandloo.
158. ✓ M. Hoyat?	M. Noor	"	Mugro
159. ✓ Abdul Haq?	Aziz Khan	"	Keen Darra.
160. ✓ Ghulam Yousef	M. Khw. Wali	"	Kar.
161. ✓ Adan Khan	M. Israel	"	Mano. Pachto.
162. ✓ M. Rehman	Abdullah Jan	"	Muskani.
163. ✓ Gul Khan	Lucha Khan	"	Musul Seri.
164. ✓ Zulfikar Ali	Madyot ul. ah	"	Alharban.
165. ✓ Gul Bar?	Gul Akher	"	Horner Ali.
166. ✓ Zia ur Rehman	Fazl ur Rehman	"	Karbori.
167. ✓ Jamil ur Rehman	Shah Muhammad	"	Ginjbitt.
168. ✓ Fida Muhammad	Baltaa. Muhammad	"	Bateela.
169. ✓ Akhter Ali	Tora Daz	"	Maha.
170. ✓ Agul Zahir Shah	Obargoh Gul	"	Dcong.
171. ✓ S. Ahmad Shah?	M. Mohib Shah	"	Fagiro.
172. ✓ H. Fayaz?	Aurangzab	"	Alabi. Kaddow.
173. ✓ Bider Nokht?	Payee Khan	"	Jabba. Bahatur.
174. ✓ Attallah	Falut Khan	"	Batley.
175. ✓ Tajud din	Abdul Karim	"	Auhurband.
176. ✓ Ghulam Haider	Shah. Iir. Ali. Shah	"	Haji. Karin.
177. ✓ M. Hoos. Saad	Ameed Khan	"	Hala. Dutecha.
178. ✓ S. Hamidullah	Saidullah	"	M. Ghori.
179. ✓ M. Kaveer	Gyl. Kasir	"	Maryia. Sultan.
180. ✓ Hamidu. ah	Haji. Fazl. Wahid	"	Hotar. Digha.
181. ✓ Amir Muhammad	Shauqur Rehman	"	reshora.
182. ✓ M. Sharif	Hir. Daz	"	Karia. Para.
183. ✓ Shur. Ali	Munabzar Khan	"	-do-
184. ✓ Said. Ali. Shah	Umer. Said	"	Jambaig.
185. ✓ M. Arsaad	Jumroz Khan	"	Jumroz. Gadu.
186. ✓ Mulla. Khan	Aurangzab Khan	"	-do-
187. ✓ Khayatulah?	Abdul Rashid	"	Batarkool.
188. ✓ M. Lulla?	Mehrajun. Mabi.	"	
189. ✓ M. H. Khan	Taj. M. Khan	"	

(188) Eastern District Officer (Zala)
 (188) Eastern District Officer (Zala)
 (188) Eastern District Officer (Zala)



P.M. NO. 3

119. Faiz ul Bari	M. Hussain	P. 1	Hassid Abad.
120. Talch Muhammad	Pida Muhammad	"	Gfa. Hanga.
121. M. Sahid	Madulah U. I.	"	S. Valsar G. T.
122. M. Itakhar Ahmad	M. Roshan.	"	Khalit Waliqich.
123. Abdul Ghani Shah	Munawar Shah	"	Ohan Spidan.
124. Saadi Khan	Poyce Khan	"	Gfa. B/Oharri Said.
125. M. Farhad Shah	M. Zahir Shah	"	L. H. Abud.
126. Wahed Khan.	Said Ali Khan	"	A. J. G. Uli. Talya.
127. Haja ul Haq?	Abdul Qayyum	"	Daboche.
128. Said Alaa?	Jan Alam.	"	Kaishal.
129. Khizbulish	Astua Khan	"	Saprocha.
130. Attaulan	Aftab	"	do.
131. Mehtoozullau	Wali. Walulloh	"	Klushal.
132. Ejaz Ahmad	M. Zahir Shah	"	Harmarin.
133. Sherin Zada	Ghulam Haider	"	Bar Murin.
134. Wahid Muhammad	Fazal Noji	"	Ruchan G. H. Y. Yar.
135. Khurshid Khan	M. Ibrahim	"	do.
136. Miaz Muhammad?	Muhammad Aza Khan	"	M. Kundi.
137. M. Iqbal	Aurangzab	"	Ruzala.
138. M. Habiulish	M. Ali Shah	"	do.
139. M. H. Ullah?	Hada Khalil	"	Jlo. Ranginabad.
140. Email	M. Hussain.	"	Musli Abad.
141. Ghazal Wahab?	Abdul Wahab	"	Shaukat Abad.
142. Jihun Zaid?	Shah Zada	"	Kuchal.
143. M. Bishir?	Azmulish	"	Mandwali.
144. M. Mumtaz?	Said Ali	"	Haijo.
145. M. Shurin	Rehmat Ullah	"	Ohan Saidan.
146. M. Khurshid	M. Ayub	"	Hil.
147. M. Yousif?	Ghulam Nabi	"	Dahoon.
148. M. Tariq	Pir Muhammad Khan	"	Rajurgan.
149. M. Khan Mulla mad.	Temaz Khan	"	Devi Ghali Hamde.
150. W. Abaziz	Abdulloh	"	Inadul Hecan Abad.
151. Boz Muhammad?	Amanullah	"	Chan Zakzaka Moran
152. Abdul Haq	Mha. ur Khan	"	M. Ghoray Karin.
153. M. Shabir Muhammad	Mahab Haid	"	Khalit Aladdin.
154. Amir Muhammad	Jan Muhammad	"	Tampi.
155. Feroz Khan?	Saif ulloh Khan	"	Daz Wal.
156. Inayt ur?	Shaman M. Hashid	"	Gandor.
157. M. Hayat?	M. Noor	"	Danda Mattangi.
158. Abdul Haq?	Azia Khan	"	Kendloo.
159. Ghulam Yousif	M. Khan Wali	"	Pagiro
160. Adan Koo?	M. Israil	"	Hecan Darra.
161. M. Rehman	Abdulrah Jan	"	Kar.
162. Gul Khan.	Lucha Khan	"	Hano Pachto.
163. Zulfiqar Ali	Hadyot ul. ah	"	Muskani.
164. Gul Bar?	Gul Akker	"	Musul Seri.
165. Zia ur Rehman	Fazl ur Retam	"	Ashurban.
166. Jamil ur Rehman	Shay Muhammad	"	Barner Ali.
167. Pida Muhammad	Bultra Muhammad	"	Karboi.
168. M. Kater Ali	Tora Baza	"	Ginjbbat.
169. M. Gai Zahir Shah	Ohargoh Gul	"	Dateelo.
170. S. Ahmad Shah?	M. Habiul Shah	"	Daha.
171. M. Fayaz?	Aurangzab	"	Doonga.
172. Bidad Bukht?	Poyce Khan	"	Pagiro.
173. W. Attulish	Talut Khan	"	Masi Kandow.
174. W. Tajud din	Abdul Karim	"	Jabba Bahler.
175. Ghulam Haider	Shah Iir Ali Shah	"	Batley.
176. M. Hoor Saad	Almed Khan	"	Ashurban.
177. M. Hamidullah	Saidulish	"	Karin.
178. M. Kaveer	Gyl Ruzib	"	Mala Datecha
179. M. Said ul. ah	Noji Ruzib Wahid	"	K. G. Jori.
180. Amir Muhammad	Shamsur Rehman	"	(182) Bagram (182) Bagram
181. M. Sharif	Hir Dad	"	Malyia Sultan.
182. M. Shabir Ali	Muhammad Khan	"	Koter Dighan.
183. M. Said Ali Shah	Umer Said	"	Lushoa.
184. M. Arsaad	Jusroaz Khan	"	Karla Para.
185. M. Khurshid Khan	Aurangzab Khan	"	do.
186. Karbatulish?	Abdul Rashed	"	Jambig.
187. M. Lulla?	Mehrujan Nabi	"	Jasroz Gada.
188. M. Ahmad Khan	Taj Khan	"	do.
			Dutarkool

Dist Office (182) Bagram (182) Bagram
 Dist Office (182) Bagram (182) Bagram

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101. Mavoid Iqbal	Dilawar Khan	P.T.	CPA Maryula Sultan.
102. H. Abdul Hafiz	Abdul Hakim	"	Jinnal.
103. Qazi Shafiqullah	K. Kuvvala	"	in Chanyali.
104. Qazi ur Rehman	Abdur Rehman	"	Arguhalari.
105. Muzir Afzal	Bakudar Khan	"	Matra Hanjoor.
106. M. Qaim Khan	Shah Nawaz	"	Muzir Vassan.

(MALLA JUDHUN HAS, ID)
 DISTRICT EDUCATION OFFICER (M.A.E.)
 PRIMARY BATTAGRAM.

Endutt: No. 2414-18 Dated Battagram the 24/5 /1957.

Copy of the above are submitted to:-

- 1). Director Primary Education, NWFP, Dalgaria Garden, Peshawar.
- 2). F.O. to Secretary of Education, NWFP, Peshawar.
- 3). UDC (M) Battagram with the remarks to inform all the above mentioned teachers on their respective addresses. Moreover, to inform the D.O. of other Districts if some one has already been transferred.
- 4). District Account Officer, Battagram.

DISTRICT EDUCATION OFFICER
 (M) PRIMARY BATTAGRAM.

Asst Dist Officer (Edt)
 (S.S.) Battagram

Asst Dist Officer (Edt)
 (S.A.L.) Battagram



OFFICE OF THE DISTRICT EDUCATION OFFICER (M) PRIMARY BATTAGRAM

OFFICE ORDER NO. ____
DATED: 28/07/1997

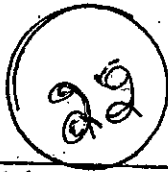
OFFICER ORDER

In the light of findings of the enquiry committee and in compliance with Memo No. P No. 33/ DEP/ ExA Abdur Rashid (DEO (M) Primary Battagram /AD(ExA) No. (M) No. ____ 33499 Dated 25/07/1997.

The appointment of the following persons above been found illegal abinitio void and against the prescribe roles. Their services are therefore, dispen sated with, with effect from the date of their replacement by there as located on purely merit basis in the light of following the selection procedure on admissible under the rules.

However, they can apply afresh along with others for their selection on merit.

S/No.	Name of Person	Father Name		Name of School
1.	Indadullah	Musa Khan	P.T	GPS Sherri
2.	Wahab	Abdul Wahab	P.T	Jijbori
3.	Alam Zaib	Zar Gul Khan	P.T	Sharif Abad
4.	Fazal Wahab	Abdul Wahab	P.T	
5.		Rustam Khan	P.T	Shawal Boy
6.	Amir Zada	Abdul Qadoos	P.T	Powey
7.	Baz Muhammad	Hazrat _____	P.T	Nasirabad
8.	Muhammad Sultan	Ghazi	P.T	Banwali
9.	Qudrat Ali Elahi	Wahab Shah	P.T	Gidri
10.	Muhammad Sherin	Hijab Khan	P.T	Tikar Banda
11.	Tameez Khan	Sultan Khan	P.T	Hutbal
12.	Muhammad Shafique		P.T	Gat Baroon
13.		Gul Faraz	P.T	Ajmera
14.	Alam Zaib		P.T	Gijbori
15.		Noorul Haroon	P.T	
16.	Yasir Rehman	Mukhtar	P.T	Gangwal
17.	Shour Rehman		P.T	Bangoo
18.	Anwar Faraz		P.T	Docdpatti
19.	Anwar Zamin	Abdus Sattar	P.T	Gharati
20.	Gul Fad		P.T	
21.	Ibadur Rehman	Niqab Elahi	P.T	Rashidated
22.	Abdul Bashir		P.T	Sooraj
23.	Anwar Zaib		P.T	



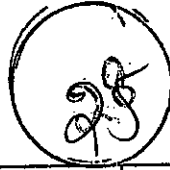
24.	Anwarullah	Muhammad Ullah	P.T	Kuree
25.	Abdul Ghafoor		P.T	
26.	Muhammd Umer	Rehmat	P.T	
27.	Abdullah		P.T	
28.	Muhammad Ibrahim	Muhammad	P.T	
29.	Gul Abbas		P.T	Goli Battagram
30.	Shabir Muhammad		P.T	B/ Balkool
31.	Nadim azam	Aurangzeb	P.T	
32.	Saeed ur Rehman	Aziz ur Rehman	P.T	
33.	Raza Muhammad	Abid Khan	P.T	
34.	Afsar Rasheed		P.T	
35.		Maqbool Khan	P.T	
36.	Anwar		P.T	
37.	M. Shoaib		P.T	
38.	Ifikhar		P.T	
39.	Riaz Muhammad		P.T	
40.	Khalil ur Rehman		P.T	
41.	Fida Muhammad		P.T	
42.			P.T	
43.	Ameer Muhammad	Inyat Khan	P.T	
44.		Sohrab Khan	P.T	
45.	Anwar Zaib	M. Ayaz	P.T	
46.	Haq Nawaz	Zahir Shah	P.T	
47.	Shad Muhammad	Fugal Khan	P.T	
48.	Amir Muhammad		P.T	
49.	Duraj Khan	Halamat Khan	TT	Boraj M. Jan
50.	Baid Ali Shah		P.T	Bor Kau Jazana
51.		Jalal Khan	P.T	Gulrehan
52.	Inyat ur Rehman	Ali ur Rehman		G.K.G.S Hassan
53.	Mir Samad Rehman	Hakim Khan	P.T	D Azimullah
54.	Momin Khan	Hazrat Balil	P.T	Rashid Abad
55.	Ghulam Farooq	Ajum Khan	P.T	Hashkani
56.	Habibullah Shah	Tahir Shah	P.T	B. Pattey
57.	Liaqat Ali	Ibrahim	NSQ	B. Pattey
58.	Siraj Khan	Mian Khan	P.T	H. Jan Muhammad
59.	Fazl ur Rehman	Abdul Hamid	P.T	Bera Dhoniga
60.	Javid M. Iqbal	Aurangzaib	P.T	Dheri Jame

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				Khan
61.	Nazir	Farhad	P.T	Bajragrab
62.	Jihanul Haq	Abdul Aman	P.T	Talshaud
63.	M. Riaz		P.T	Hanifabad
64.	Aurangzeb Khan	Mindra Khan	P.T	Kassi Hadi
65.	S. Zuhrab Shah	Farqan Said	P.T	Kathora
66.	Munir Khan	Gul Namroz	P.T	Burwai
67.	Rustam Khan	Biqra Khan	P.T	Dawgar
68.	M. Shafique	Abdullah	P.T	Jabatiruz.
69.	Badar Khan	Ali Gohar Khan	P.T	Mashkanai
70.	Fida Muhammad	Fazl ur Rehman	P.T	Kiargali U. Khan
71.	M Khalid	Bultan Room	P.T	Gidri Trund
72.	Ibrarullah	Hidayatullah	P.T	N D. Azumullah
73.	M Balil	Ikhtiar Malook	P.T	Damgat
74.	Ahmed Khan	Gul M. Khan	P.T	Rashidabad
75.	Amal Jan	Baitul Haq	P.T	Gidri Trand
76.	Fatebul	M. Faridoon	P.T	Jaba Teroz
77.	Zabel Khan	Abad Khan	P.T	Mundri
78.	Ghulam Rehmani	Fazl ur Rehman	P.T	Docdpatti
79.	Badi uz Zaman	Tali Muhammad	P.T	Turia Hill
80.	S. Wahab Shah	M. Said	P.T	Ghinoon
81.	Abdul Ali	Abdul Latif	P.T	Talshous
82.	Miskin	Amanullah	P.T	Bagh Bandi
83.	M Javaid	Said Rehmat Shah	P.T	Chinwo
84.	Mehmood Shah		P.T	Bajergran
85.	Shahzada	Abdul Matein	P.T	Pekbanda
86.	Shoukat Ayaz	Mulak Jan	P.T	Hanifabad
87.	Inamullah	Pera Khan	P.T	Borwey
88.	Habibullah	Junsor Khan	P.T	Mundri
89.	Aurangzeb	M. Miskeen	P.T	Bajergran
90.	Bakht Morin	Hushnak	P.T	Teria Hill
91.	Ali Asar Khan	Misar Khan	P.T	G/Nawab Said
92.	M Iqbal	Gul Muhammad	P.T	Murzala
93.	Rustam Khan	Talas Khan	P.T	Obappergram.
94.	M Shabid	Abdul Razaq	P.T	Peshora
95.	Attaullah	M. Saeed	P.T	Shalkhay
96.	Shah Rozen	Hayat Khan	P.T	Do
97.	Ali Rehman	Umra Khan	P.T	Walarge
98.	Hussain Ahmed	Sherin Khan	P.T	Okey
99.	Rab Nawaz Khan	Afsar M. Khan	P.T	Tarbor
100.	Farhat Khan	Murad	P.T	Rashidabad
101.	Inyat Rehman	Gujar Khan	P.T	Shoukat Abeo
102.		Shah Zad Khan	P.T	S. Khal Bando
103.	Noor ul Islam	Hazrat	P.T	Dabons

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104.	Rustam	Babir Khan	P.T	Khatoona
105.	Bazrat Islam	M. Zanif	P.T	Pak Banna
106.	Haji Muhammad	Roshen Khan	P.T	
107.	M Javaid	Mer Ahmed	P.T	Thaya
108.	Shamshed Din		P.T	Balakote
109.	Nadar Khan	Mir Ahmed Khan	P.T	
110.	Attullah	Amanullah	P.T	Rutiar abad
111.	Islam Shah	Zain Gul	P.T	Kukilar
112.		Mutabar	P.T	Ghanibaidan
113.		Gul Naz	P.T	Hajagram
114.	Saeed Rehman ur	Kuchkol Khan	P.T	M.M Ahmed
115.	Sardar Muhammad	Hasrat Younis	P.T	Khait Walianab
116.	Anwar Faraz	Abdul Wahab	P.T	B/ Cherinbaid
117.	Shokat Ali Shah		P.T	
118.	S. Mukhtair Ali		P.T	
119.	Faiz ul Bari		P.T	Hanifabad
120.	Talash Muhammad		P.T	
121.			P.T	
122.	Iftakhar Ahmed	M Roshen	P.T	
123.	Abdul Ghani Shah		P.T	Ghari Soldan
124.		Poyee Khan	P.T	GPS/ B/ Charri Said
125.	S. Farhad Shah	M. Zahir Shah	P.T	
126.	Habib Khan	Said Ali Khan	P.T	
127.	Rajwal Haq	Abdul Qayoom	P.T	Daboone
128.	Saib Alam	Jan Alam	P.T	Kaishal
129.	Hizbullah	Astan Khan	P.T	Saprocha
130.	Attaullah	Aftab	P.T	Do
131.	Mehtoozullah	Wali Waliullah	P.T	Kiashal
132.	Ejaz Ahmed	M.Zahir Shah	P.T	Barmarla
133.	Sherin Ahmed	Ghulam Haider	P.T	Bar Muria
134.	Bashir Muhammad	Fazal Haji	P.T	Yar
135.	Khurshid Khan	M. Irshad.	P.T	Do
136.	Niaz Muhammad	Muhammad Asa Khan	P.T	Birkuni
137.	M Iqbal	Aurangzeb	P.T	Ranzala
138.		M. Ali Shah	P.T	Do
139.		Mada Khail	P.T	
140.	Ismail	M. Hassan	P.T	
141.	Gulzar Wahab ul	Abdul Wahab	P.T	Shoukat Abad
142.	Jihan Zaib	Shah Zada	P.T	Kuchal
143.	M. Bashir	Azimullah	P.T	Mandrwali
144.	M. Mumtaz	Said Ali	P.T	Ranjo
145.	M. Sharin	Rehmatullah	P.T	Ohem Saidsh



146.	Khurshid	M. Ayub	P.T	Illahi
147.	Younis	Ghulam Nabi	P.T	Daboona
148.	M Tariq	Pir Muhammad Khan	P.T	Lagargran
149.	Khan Muhammad		P.T	Deri Bhali Banda
150.	Abaziz	Abdullah	P.T	Landoi Noman Abad
151.	Baz Muhammad	Amanullah	P.T	Chan
152.	Abdul Haq		P.T	
153.	S. Shabir Hussain	Habib Said	P.T	
154.	Amir Muhammad	Jan Muhammad	P.T	
155.	Pervaiz Khan	Saif ullah Khan	P.T	
156.	Inayat ur Rehman		P.T	
157.	M. Boyat	M. Noor	P.T	
158.	Abdul Haq	Aziz Khan	P.T	
159.	Ghulam Yousaf	M khan wali	P.T	
160.	Adam Khan	M. Irshad	P.T	Neen Dara
161.	M. Rehman	Abdullah Jan	P.T	Kar
162.	Gul Khan	Lucha Khan	P.T	Hano Pashto
163.	Zulfiqar Ali	Hedyat ullah	P.T	Muskani
164.	Gul Bar	Gul Akbar	P.T	Dubal Swr
165.	Zia ur Rehman	Fazl ur Rehman	P.T	Barwr Ptd
166.	Jamil ur Rehman	Shar Muhammad	P.T	Karbori
167.	Fida Mehmood	Sultan Muhammad	P.T	Ginjbri
168.		Tora Baz	P.T	Butteela
169.	Gul Zahir Shah	Obargoh Gul	P.T	
170.	S Ahmed Shah	Habib Shah	P.T	Doonga
171.	M. Fayaz	Aurangzeb	P.T	Faqiro
172.	Bidar Bakht	Poyab Khan	P.T	
173.	Attullah	Tolut Khan	P.T	Jabba Bahadar
174.		Abdul Karia	P.T	Batley
175.	Ghulam Haider Shah		P.T	
176.	Hoor Saeed	Ahmed Khan	P.T	Karin
177.	S. Hamidullah	Ubaidullah	P.T	Mala Battela
178.			P.T	
179.	Hamidullah	Haji Faiz Wahid	P.T	Naryais Sultan
180.	Amir Muhammad		P.T	Roter Dishan
181.	M. Sharif	Hir	P.T	Peshora
182.	Bhar Ali	Mubatar Khan	P.T	Karin Pora
183.	Said Ali Shah	Umer Said	P.T	Do
184.	M Arshad	Jumroaz Khan	P.T	Jambaig
185.	Khawar Khan	Aurangzaib Khan	P.T	Jamroz Gada



186.		Abudi Rashid	P.T	
187.	M. Balawal		P.T	Do
188.	Nawaz Khan	Taj Muhammad	P.T	Batarkool
189.	Javaid Iqbal	Dilawar Khan	T.T	Naryala Sultan
190.	Abdur Rauf	Abdul Hakim	P.T	
191.			P.T	Jigool
192.	Atiq ur Rehman	Abdur Rehman	P.T	
193.	Nazir Ahmed	Sakandar Khan	P.T	Hatta Manssor
194.	M. Naim Khan	Shah Nawaz	P.T	

(MALIK ABDUR RASHID)
DISTRICT EDUCATION OFFICER, (MALE)
PRIMARY BATTAGRA

Endst No. 2414-18/ Dated Battagram the:- dated: 28/____/1997

Copy of the above are submitted to:-

1. Director Primary Education N.W.F.P Dalgari Garden Peshawar.
2. F.B. To Secretary of Education N.W.F.P Peshawar.
3. SDEO (M) Battagram with remarks to direction all the above mentioned.
4. District account officer.

(MALIK ABDUR RASHID)
DISTRICT EDUCATION OFFICER, (MALE)
PRIMARY BATTAGRA

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C

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BATTAGRAM.

ORDER

Consequent upon the recommendation of the Departmental Selection Committee and approval of the competent authority (Deputy Commissioner) Battagram, in the light of Khyber Pakhtunkhwa Act XVII 2012 and Honorable Court Judgment Peshawar High Court Abbottabad Bench dated 17-01-2013 the following Sacked employees are hereby appointed as PST in BPS-12 (Rs:7000-500-22000) (Non pensionable) plus usual allowances as admissible under the rules against the vacant post at the schools mentioned against each in the interest of public service with effect from the date of their taking over charge

S. No	Name of Candidates	Father's Name	Address	Posted at	Remarks
1	Sardar Mohd. Khan	Hazrat Younas	Thaya Banian BTM	GPS Batkool Sarhadi	Against V/Post
2	Ghulam Haider Shah	Pir Ali Shah	Kuz Madan BTM	GPS Kar Patay Pashto	Against V/Post
3	Bahadar Khan	Ali Gohar Khan	Dharian BTM	GPS Kannai	Against V/Post
4	Ghulam Yousaf	Mohd Khan Wall	Shamlai BTM	GPS Hill Bach	Against V/Post
5	Muhammad Hayat	Muhammad Noor	Trand BTM	GPS Kaloota	Against V/Post
6	Noshervan	Noor ul Hassan	Gijbon BTM	GPS Mulkot	Against V/Post
7	Zeebal Khan	Mubara's Khan	Thakot BTM	GPS Piza Batkool	Against V/Post
8	Duraj Khan	Hukmat Khan	Pokal Allai	GPS Mangri	Against V/Post
9	Pervez Khan	Saif ullah	Ajmera BTM	GPS Beran Gantar	Against V/Post
10	Imdad Ullah	Musa Khan	Gidri Khairabad BTM	GPS Barmai	Against V/Post
11	Shahi Khan	Bal Khan	Peshora BTM	GPS Mala Batecla	Against V/Post
12	Abdul Aziz	Haji Abdullah	Gulibagh BTM	GPS Battagram	Against V/Post
13	Muhammad Miskoon	Abdul Latif Khan	Takia BTM	GPS Thaya	Against V/Post
14	Muhammad Riaz	Ghulam Hussain	Banser Shamlai BTM	GPS Koshgram	Against V/Post
15	Khurshed Khan	M. Arshad Khan	Biari Allai	GPS Chapri Karg	Against V/Post
16	Furhad Khan	Murad	Ajmera BTM	GPS Nahoo	Against V/Post
17	Momin Khan	Bilal Khan	Kuzabanda BTM	GPS Nohar Qasim	Against V/Post
18	Islam Shah	Mian Gul Shah	Bandigo BTM	GPS Sar Nasim	Against V/Post
19	Rustam Khan	Palas Khan	Phagora BTM	GPS Ajlay Shahroom	Against V/Post
20	Rusiam Khan	Begroh Khan	Thakote BTM	GPS Nehray Thakot	Against V/Post
21	Muhammad Shafiq	Atiqullah	Dabri Paimal BTM	GPS Trangar	Against V/Post
22	Anwar Faraz	Abdul Wahab Khan	Banian BTM	GPS Jabba Asharban	Against V/Post

NOTE The Drawing and disbursing officer are directed to verify their Degrees/Certificates from the concerned Board/University/Institutions from the quarter concerned.

TERMS AND Conditions:-

- 1 The appointment is made purely on temporary basis and liable to termination at any time without assigning any reason or notice.
- 2 Theirs service will be on regular basis but not pension able and they will contribute to CP Fund.
- 3 They will be abide by the rules and regulation issued from time to time by the Provincial Govt.
- 4 Their appointment has been made in the Act of Sacked Employees Appointments Act, No XVII, 2012.
- 5 They should obtain Medical fitness Certificate from the Medical Superintendent DHQ Hospital Battagram.
- 6 In case of resignation.
- 7 The candidates having less qualification will acquire requisite training and obtain FA qualification within three years failing which their appointment shall stand terminated automatically.
- 8 They should take over charge within in 15 days after the issuance of this appointment order otherwise the order of appointment shall stand cancel after 15 days.


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- 9 Charge report should be submitted to all concerned.
10 The DDO is directed to obtain an affidavit on stamp paper duly attested by the 1st Class Magistrate that:
(a) They will served the Education department for more then five(5) year countinously.
(b) They are not served any other Department/Corporation/Agency.
(c). Their previous services if any will be treated as EOL (without Pay).
(d) They will not go in the court for their previous service benefits.
11 No TADA etc is allowed to any one.

DEPUTY COMMISSIONER
(CHAIRMAN)
BATTAGRAM

Endst:No 7825-31 /EB/AE-II/Appri:Sacked:Emp: DATED 15/02/2013

- Copy for information and necessary action to the:
- 1 Deputy Commissioner Battagram.
 - 2 Registrar Honorable High court Peshawar
 - 3 District Accounts Officer Battagram.
 - 4 Head Master concerned School.
 - 5 D.D.E.O. (Male) Battagram.
 - 6 Candidates concerned.
 - 7 Office file.


Assistant District Education Officer
Litigation Battagram

Annexure "D"

**THE KHYBER PAKHTUNKHWA
SACKED EMPLOYEES (APPOINTMENT) ACT, 2012.**

(KHYBER PAKHTUNKHWA ACT NO. XVII OF 2012)

CONTENTS

PREAMBLE

SECTIONS

1. Short title, extent and commencement.
2. Definitions.
3. Appointment of sacked employees.
4. Age relaxation.
5. Sacked employees shall not be entitled to claim seniority and other back benefits.
6. Preference on the basis of age.
7. Procedure for appointment.
8. Removal of difficulties.
9. Act to override other laws.
10. Power to make rules.

**THE KHYBER PAKHTUNKHWA
SACKED EMPLOYEES (APPOINTMENT) ACT, 2012.**

(KHYBER PAKHTUNKHWA ACT NO. XVII OF 2012)

[first published after having received the assent of the Governor of the Khyber Pakhtunkhwa in the Gazette of Khyber Pakhtunkhwa (Extraordinary), dated the 20th September, 2012].

**AN
ACT**

to provide relief to those sacked employees in the Government service, who were dismissed, removed or terminated from service, by appointing them into the Government service.

WHEREAS it is expedient to provide relief to those sacked employees who were appointed on regular basis to a civil post in the Province of the Khyber Pakhtunkhwa and who possessed the prescribed qualification and experience required for the said post, during the period from 1st day of November 1993 to the 30th day of November, 1996 (both days inclusive) and were dismissed, removed, or terminated from service during the period from 1st day of November 1996 to 31st day of December 1998 on various grounds;

WHEREAS the Federal Government has also given relief to the sacked employees by enactment;

AND WHEREAS the Government of the Khyber Pakhtunkhwa has also decided to appoint these sacked employees on regular basis in the public interest;

It is hereby enacted as follows:

1. **Short title, extent and commencement.**—(1) This Act may be called the Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012.

(2) It shall apply to all those sacked employees, who were holding various civil posts during the period from 1st day of November, 1993 to 30th day of November, 1996 (both days inclusive).

(3) It shall come into force at once.

2. **Definitions.**— In this Act, unless the context otherwise requires, the following expressions shall have the meanings hereby respectively assigned to them that is to say,-

- (a) "civil post" means a post created by the Finance Department of Government for the members of civil service of the Province;
- (b) "Department" means the Department and the Attached Department as defined in the Khyber Pakhtunkhwa Government Rules of Business, 1985, including the Divisional and District Offices working thereunder;
- (c) "Government" means the Government of the Khyber Pakhtunkhwa;
- (d) "Prescribed" means prescribed by rules;
- (e) "Province" means the Province of the Khyber Pakhtunkhwa;
- (f) "rules" means the rules made under this Act; and
- (g) "Sacked employee" means a person who was appointed on regular basis to a civil post in the Province of the Khyber Pakhtunkhwa and who possessed the prescribed qualification and experience for the said post at that time, during the period from 1st day of November 1993 to the 30th day of November, 1996 (both days inclusive) and was dismissed, removed, or terminated from service during the period from 1st day of November 1996 to 31st day of December 1998 on the ground of irregular appointments;

3. Appointment of sacked employees.— Notwithstanding anything contained in any law or rule for the time being in force, on the commencement of this Act, all sacked employees subject to section 7, may be appointed in their respective cadre of their concerned Department, in which they occupied civil posts before their dismissal, removal and termination from service:

Provided that the sacked employees shall be appointed against thirty percent of the available vacancies in the said Department:

Provided further that the appointment of sacked employees shall be subject to the medical fitness and verification of their character antecedents to the satisfaction of the concerned competent authority.

4. Age relaxation.— The period during which a sacked employee remained dismissed, removed or terminated from service, till the date of their appointment shall be deemed to have been automatically relaxed and there shall be no further relaxation under any rules for the time being in force.

5. Sacked employees shall not be entitled to claim seniority and other back benefits.— A sacked employee appointed under section 3, shall not be entitled to any claim of seniority, promotion or other back benefits and his appointment shall be considered as fresh appointment.

6. Preference on the basis of age.— On the occurrence of a vacancy in the respective cadre of the concerned Department of the sacked employee against the thirty percent available share, preference shall be given to the sacked employee who is older in age.

7. Procedure for appointment.—(1) A sacked employee, may file an application, to the concerned Department within a period of six months from the date of commencement of this Act, for his appointment in the said Department:

Provided that no application for appointment received after the due date shall be entertained.

(2) The concerned Department shall maintain a list of all such sacked employees whose applications are received under sub-section (1) in the respective cadres in chronological order.

(3) If any vacancy occurs against the thirty percent available share of the sacked employee in any Department, the senior in age from such sacked employee shall be considered by the concerned Departmental Selection Committee or the District Selection Committee, as the case may be, to be constituted in the prescribed manner, for appointment:

Provided that no willingness or response is received within a period of thirty days, the next senior sacked employee shall be considered for appointment.

(4) The Concerned Departmental Selection Committee or District Selection Committee, as the case may be, will determine the suitability or eligibility of the sacked employee.

(5) If no sacked employee is available against thirty percent vacancy reserved in respective cadre in a Department, then the post shall be filled through initial recruitment.

8. Removal of difficulties.— If any difficulty arises in giving effect to any of the provisions of this Act, the Chief Minister Khyber Pakhtunkhwa may issue such order not inconsistent with the provision of this Act as may appear to him to be necessary for the purpose of removing the difficulty:

Provided that no such power shall be exercised after the expiry of one year from coming into force of this Act.

9. Act to override other laws.—Notwithstanding anything to the contrary contained in any other law or rules for the time being in force, the provisions of this Act shall have overriding effect and the provisions of any other law or rules to the extent of inconsistency to this Act, shall cease to have effect.

10. Power to make rules.— Government may make rules for carrying out the purposes of this Act.

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BOARD OF
INTERMEDIATE & SECONDARY EDUCATION
ABBOTTABAD

45229

DETAILED MARKS CERTIFICATE

Intermediate Examination (Humanities Group)

SESSION 19 93 (Annual / Supplementary)

Name

Bahadar Khan

Father's Name

Ali Gohar Khan

Roll No.

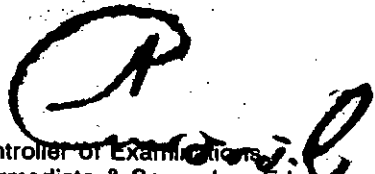
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SUBJECTS	Subjects Marks	MARKS OBTAINED			
		Part-I	Part-II	Total in	
				Figures	Words
1. English	200			61	
2. Urdu	200			89	
3. Islamic Education	50				
4. Pakistan Studies	50			34	
5. <u>1st H</u>	200			74	
6. <u>CW</u>	200			76	
7. <u>1st S.</u>	200			80	
Total	1100			414	E

Note : Errors/Omissions excepted.

Date _____ 19 _____

Prepared by _____ Checked by _____


Controller of Examinations
Board of Intermediate & Secondary Education
ABBOTTABAD



ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

RESULT INTIMATION CARD

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 Examinations Department AIOU

PROGRAMME: P. T. C **SEMESTER:** SPRING-14
ROLL NO.: AX606761 **REGISTRATION NO.** 13NEMO1507
NAME: BAHADER KHAN
FATHER NAME: ALI GOHAR KHAN
ADDRESS: VILLAGE DHARIAN
 P/O BANDIGD
 BATTAGRAM BATTAGRAM

SR. NO.	COURSE CODE	ASSIGNMENTS		FINAL MARKS				CONFL. MARKS	GRADE	RESULT
		Theory	Practical	Work-Shop	Teach Practice	Exam	Viva			
1	PTC-611 F			85				85	A+	PASS
2	PTC-617 F	92.50				48		61	B	PASS
3	PTC-618 F	92.50				53		65	B	PASS
4	PTC-619 F	86.50				62		69	B	PASS
5	PTC-620 F					55			F	FAIL

Signature of Dealing Official _____

Controller of Examinations

The result card is issued, errors and omissions excepted, as a notice only. An entry appearing in it does not itself confer any right or privilege independently to the grant of a proper Certificate/Degree which will be issued under the Regulations in due course.

12/01/2015

Result Declaration Date:

Note: Pl. Read the instructions overleaf.

0045749



ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

RESULT INTIMATION CARD

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Examinations Department AIU

PROGRAMME: P.T.C SEMESTER: AUTUMN-13
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 NAME: BAHADUR KHAN
 FATHER NAME: ALE DOKAR KHAN
 ADDRESS: VILLAGE DHARIAN
 P.O. BANDIHO
 BATTAGRAM

SR. NO.	COURSE CODE	ASSIGNMENTS		FINAL MARKS				CONFL. MARKS	GRADE	RESULT
		Theory	Practical	Work-Shop	Teach Practice	Exam	Viva			
1	PTC-412	70				61		66	B	PASS
2	PTC-414	70				65		73	A	PASS
3	PTC-415	70				50		62	B	PASS
4	PTC-416	70				72		76	A	PASS

Signature of Dealing Official _____

Controller of Examinations

The result card is issued, errors and omissions excepted, as a notice only. An entry appearing in it does not itself confer any right or privilege independently to the grant of a proper Certificate/Degree which will be issued under the Regulations in due course.

Note: Pl. Read the instructions overleaf.

Result Declaration Date: _____

39

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

PROVISIONAL RESULT CARD



Serial No 384113

Roll No.

AX606761

Name BAHADER KHAN

Registration No.

13NEM01509

Final Semester

SPR-2016

Father's Name ALI GOHAR KHAN

Address VILLAGE DHARIAN P/O BANDIGO



Tehsil BATTAGRAM

District BATTAGRAM

REVISED

has successfully completed PRIMARY TEACHING CERTIFICATE

The detail of passed courses is as under

Semester	Course Code	Title of Courses	Marks	
			Maximum	Obtained
AUT- 13	0613	PRINCIPLES OF EDUCATION	100	66
AUT- 13	0614	EDUCATIONAL PSYCHOLOGY	100	73
AUT- 13	0615	SCHOOL ORGANIZATION	100	62
AUT- 13	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	76
SPR- 14	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	85
SPR- 14	0617	TEACHING OF URDU	100	61
SPR- 14	0618	TEACHING OF MATHEMATICS	100	65
SPR- 14	0619	TEACHING OF SCIENCES & PHYSICAL	100	69
SPR- 16	0620	TEACHING OF ISLAMIAT & SOCIAL STUDIES	100	62

Total Credits 5

Result Declared on JANUARY 10, 2017

Date of Issue MARCH 21, 2017

Total Marks/Obtained 900 / 619

Percentage/Grade 69 / B

[Signature]

Controller of Examinations

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

University of Peshawar

(Pakistan)

Session ANNUAL 1996

BAHADAR KHAN

SON

of

ALI GOHAR KHAN

and a student of

DISTRICT BATAGRAM

having passed the prescribed examination held in

AUGUST 1996

is this day admitted by the University of Peshawar to the Degree of

Bachelor of Arts

in SECOND Division

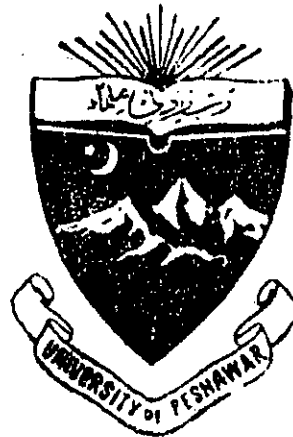
The Examination was taken as a whole / in parts

Serial No. 018543

Registration No. 94-BT-8795

Roll No. 21661

Result declared on FEBRUARY 19, 1997



Fazli Hain
Registrar

Countersigned

M. J. Khan
Vice-Chancellor

40

(41)

5872

S-B.

IPC

Roll No. 6084

BOARD OF INTERMEDIATE & SECONDARY EDUCATION

ABBOTTABAD
N.W.F.P. PAKISTAN
PROVISIONAL CERTIFICATE

INTERMEDIATE EXAMINATION

Session 1993 Annual / Supplementary
Arts Group

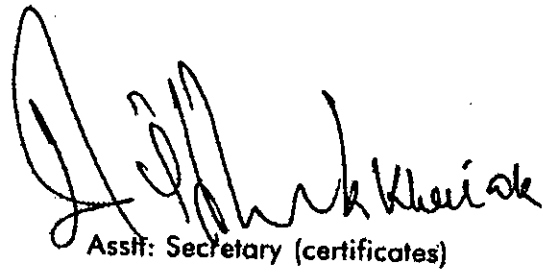
THIS IS TO CERTIFY THAT Bahader Khan
Son/daughter of Ali Gohar Khan
and a candidate of Ballogram
Registered No. _____ has passed the INTERMEDIATE EXAMINATION of the
Board of Intermediate & Secondary Education Abbottabad held in Oct 1993
as a Regular/Private candidate. He/She obtained 414 Marks out of 1100 and
has been placed in Grade (E) Representing salesfactory

The Examination was taken as a whole/in parts

Prepared by _____

Checked by _____

Date of Preparation 9/9/93


Asst: Secretary (certificates)

Asst. Secretary (Certificates)
Board of Intermediate & Secondary Education
Abbottabad

42

N^o 002546

UNIVERSITY OF PESHAWAR (PAKISTAN)



DETAILED MARKS CERTIFICATE

Roll No. 21661

B.A. PART - II EXAMINATION. 1996 (Annual/Supplementary)

Name Bahadar Khan

Father's Name Ali Gohar Khan

Certified that the candidate secured the following marks and is placed in - Second Division.

SUBJECTS	MARKS OBTAINED		
	MAXIMUM MARKS	IN FIGURE	GRADE
1. English	75	39	Thirdly Nine
2. Isl: Studies	75	45	Forty Five
3. Urdu	75	42	Forty Two
4. Pakistan Studies	40	25	Twenty Five
B.A Part - I marks	285	159	One Hundred & Fifty Nine
TOTAL	550	310	Three Hundred & Ten

Errors & omissions are subject to subsequent rectification.

The Examination was taken as a Whole / in Parts.

RESULT DECLARATION DATE _____

Date _____

CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

43

S. No. 472598

Roll No. 47822



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan

Secondary School Certificate Examination
SESSION 1985 (ANNUAL)


THIS IS TO CERTIFY THAT BAHADER KHAN
Son/Daughter of ALI GOHER KHAN
and a resident of MANSEHRA DISTRICT.

has passed the *Secondary School Certificate Examination*
of the Board of Intermediate and Secondary Education, Peshawar held in April 1985
as a *Private candidate*. He/She obtained 348 Marks out of 850
and has been placed in Grade D Representing FAIR

The Candidate passed in the following subjects:

- | | | | |
|------------|--------------|------------------|-----------------|
| 1. English | 3. Islamiyat | 5. PAK. STUDIES. | 7. MATHEMATICS. |
| 2. Urdu | 4. PHYSICS. | 6. CHEMISTRY | 8. BIOLOGY. |

Date of birth according to admission form is FIRST APRIL,
one thousand nine hundred and SIXTY THREE (1-4-1963.)


Asstt. Secretary
8 August, 1985


Secretary

This certificate is issued without alteration or erasure.



**PAYROLL SYSTEM
AMENDMENT FORM
SINGLE EMPLOYEE ENTRY**

**SUB DIVISIONAL EDUCATION
OFFICER (MALE) BATTAGRAM**

Form: PAY02
Date: _____
Page No.: _____

OFFICE OF THE _____
FOR THE MONTH OF 9/20/16

DDO Code ⁵ (Cost Center) 6039 Description _____

Personnel Number ⁷ 00699253 Employee Name ⁸ Barhadex Iwan

National ID Card No. _____

Grade (Pay Scale Group) ¹⁰ 12 PST: Gps: Multitiarabod

Salary Status Start Stop

14

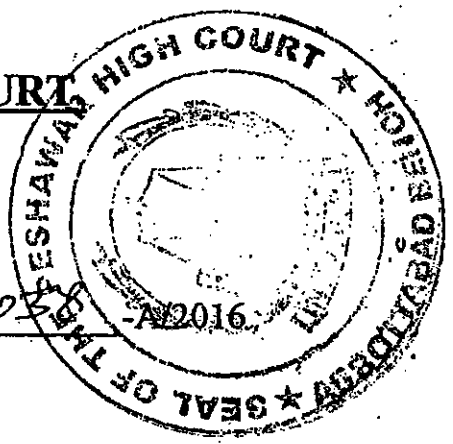
GENERAL DATA CHANGE ¹¹			CHANGE IN PAYMENTS/DEDUCTIONS ¹⁷					Effective Date ¹⁷	Remarks ²²
Info Type ¹⁴	Field ID ¹⁵	New Contents ¹⁶	Wage Type ¹⁸	Amount			Adj ²⁰		
				Rupees ¹⁹	Paisa				
									<p>Pay stopped w/e 9/20/16 due to decision of Deputy Commissioner and DED (M) Battagram as he was not finalise the PTC + FA in 3 years.</p>

SUB DIVISIONAL EDUCATION OFFICER (MALE) BATTAGRAM

97

F

BEFORE THE PESHAWAR HIGH COURT
ABBOTTABAD BENCH



Writ Petition No. 10288 of 2016

Bahadur Khan son of Ali Gohar Khan, presently PST, Govt. Primary School Kanai, District Battagram.

...PETITIONER

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education Peshawar.
2. Deputy Commissioner, Battagram.
3. District Education Officer (Male), Battagram.
4. Deputy District Education Officer (Male), Battagram.

...RESPONDENTS

Certified to be True Copy.
 EX-100
 Peshawar High Court
 Abbottabad Bench
 Authorized Officer Secy Secy's Ordms
 No. 4711
 3-11-16

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

Respectfully Sheweth; -

FILED TODAY

Additional Registrar
Peshawar High Court
Abbottabad Bench
3-11-16

The petitioner humbly submits as under;-

AD EOC PI
 [Handwritten signature]
 3-11-16

(98)

1. That petitioner was appointed as teaching during the year 1995 where after the services of the petitioner with others who were appointed during the period of 1st Day of 1993 to 31st day of December 1996 were terminated during the year 1997. Copy of appointment letter and termination letter is annexed as Annexure "A" & "B" respectively.

2. That during the year 2009 the Govt. Promulgated Sacked Employee (Reinstatement Ordinance 2010), whereby the services of all the employees terminated during November 1993 to December 1998 were reinstated. Copy of referred Ordinance is appended herewith as Annexure "C".

3. That later on Sacked Employee (Reinstatement) Act 2010 was passed by the legislature and was published. Copy of referred Act is appended herewith as Annexure "D".

Certified to be a true copy

[Signature]
 District Judge
 Abbottabad District
 authorized Under Section 40-A of the Code of Civil Procedure

FILED TODAY

[Signature]
 Additional Registrar
 Peshawar High Court
 Abbottabad Bench
 2/11/26

49

4. That the Federal Govt. and Provincial Govt. re-instated all employees which are entitled under the law and others were given relief of "Golden Hand Shake".
5. That the Provincial Govt. also after the meeting of Provincial Cabinet on 3rd February 2009, while expediting the matter, Circular vide letter dated 21st February 2009 was also issued.
6. That inspite the afore-referred proceeding and Act referred above, since the respondent No.1 and 3 not consider the reinstatement of the petitioner thus petitioner alongwith others approaches to this Honourable Court through writ petition No. 179-A of 2012, which was disposed of by way of order dated 12/03/2013, thereby the petitioners were reinstated vide office order No. 7825-31 dated 15/02/2013. Copies of writ petition and judgment thereon and copy of letter dated 15/12/2013 are appended herewith as Annexure "E", "F" & "G" respectively.

[Handwritten signature]
17/12/13

FILED TO ...
✓
ADJUTANT ...
GOVT ...
17.12.13



7. That at the time of reinstatement, the respondents by putting their own fantastic terms and conditions i.e "in the order vide Annexure "G" acted without lawful authority thereby bypass the KPK Act No. XVII of 2012" relating to the reinstatement of sacked employee.

8. That now the respondents No.3 & 4 without any notice stopped the monthly salary of the petitioner w.e.f September 2016, on objection the respondent is referring the entry in pay role system for the month of September 2016 which reveals as under, *"Pay stopped w.e.f September 2016 due to decision of Deputy Commissioner and EDO (Male) Battagram as he has not finalize the PTC + F.A in three years"*. Copy of referred pay role system for the month of September, 2016 is appended herewith as Annexure "H".

Certified to be True Copy

[Signature]
 Court
 Application Section
 District Court
 Peshawar

9. That since the terms and conditions and entry and pay roll system for the month of September 2016 on the decision of


SN
[Signature]
 27/11/16

respondents is against the law and having been impose without lawful authority therefore, the same is hereby called in question on the grounds, set below;

GROUNDS: -

- a) That the terms and condition are against the law and especially against the "Reinstatement Act of Sacked Employee Act 2012".
- b) That since the petitioner was reinstated in view of afore-referred Act; and after the reinstatement the new terms and conditions, cannot be impose.
- c) That the reinstatement of the petitioner is in fact under the law on the existing terms and condition which was set at the time of his original appointment.

Confined to be True Copy


17/1/16

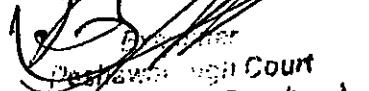
h

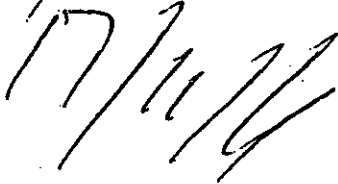
K. V. A. H.



- d) That the petitioner rendered his major span of his life in his present and will face rigorous in case of his termination.
- e) That on the other hand the petitioner achieved the terms and condition and fulfill it except non-submission of one assignment in last paper otherwise the F.A certificate is completed. Copy of F.A certificate with the result card of PTC are appended herewith as Annexure "I" & "J".
- f) That the conduct of the respondents is against the fundamental rights and respondents act is discriminatory towards the petitioners.
- g) That the respondents are bond to act under the law and they are bond to act while keeping in view Article (4) of the Constitution of Islamic Republic of Pakistan, 1973.

Certified to be True Copy

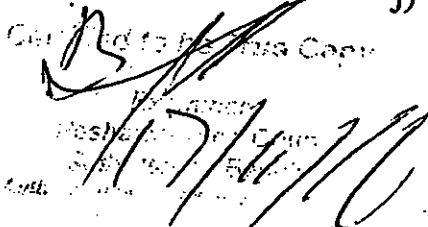

 District Judge
 District Court
 Abbottabad Bench
 Auth. of the Court - Secy to the Bench



✓

13/11/15

- h) That the petitioner is still performing his duty with the entire satisfaction and during this period the petitioner got sufficient experience and job skill and as well as aware about latest method of teaching.
- i) That since at the time of reinstatement no hard copy of reinstatement order was handed over to the petitioner, therefore, petitioner remained unaware the impugned term and condition in black and white.
- j) That the afore-referred Act reveals that is nothing about imposition of any condition against the appointment thus the condition impose in order vide Annexure "G" is coram-non-judice, having been impose without lawful authority.
- k) That there is no other alternate, efficacious remedy available to


 Certified to be a true Copy
 17/11/16

✓

L21/10/16

84

petitioner except the instant writ petition.

l) That notice/ intimation of filing the instant writ petition against the respondents has duly been served upon the respondents through registered post. Copies of notice & receipts are attached as Annexure "K".

m) That addresses of the parties have correctly been mentioned in the heading of the petition.

Certified to be True Copy.

Postmaster
Abbottabad Bench
4/11/18

n) That the court fee stamp paper worth Rs. 500/- is appended herewith.

FILED TODAY

Additional Registrar
Peshawar High Court
Abbottabad Bench
3/11/18

o) That other grounds shall be urged at the time of arguments.

In the giving circumstances, it is therefore, humbly prayed that on acceptance of instant writ petition this Honourable Court may kindly be direct the respondents; -

35

✓
 A) To undo the term and condition i.e
 "The candidate having less
 qualification will acquire requisite
 training and obtain F.A/ PTC
 qualification within three years failing
 which their appointment shall stand
 terminated automatically.

B) To issue direction to the respondents
 to release the monthly pay of
 petitioner from September 2016 to till
 now.

Certified to be True Copy
 High Court
 Bench
 Under Sec 15 Act Ord

C) Not to take any adverse action against
 the petitioner.

D) Any other relief to which the
 petitioner is deemed entitled including
 the extension of time for waiting the
 result of last submitted assignment for
 PTC may also be granted in the
 interest of justice.

AND TODAY

Additional Registrar
 High Court
 Bench

(B6)

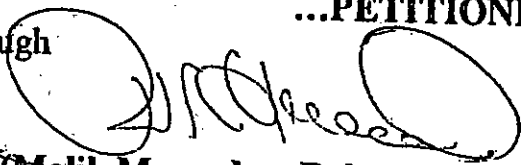
INTERIM RELIEF; -

The respondent No.3 may kindly be directed to release the monthly pay of petitioner w.e.f September 2016 to till now and not to take any adverse action against the petitioner.

...PETITIONER

Dated: 26/10/2016

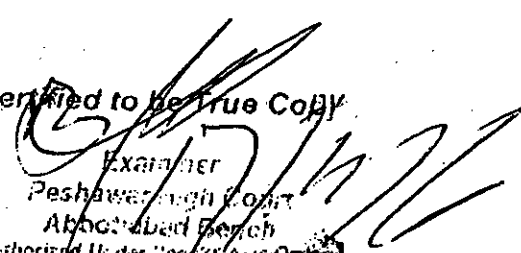
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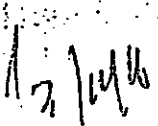

 (Malik Masood ur Rehman Awan)
 Advocate Supreme Court of Pakistan,
 Abbottabad

VERIFICATION:-

Verified on oath that the contents of forgoing writ petition are true and correct to the best of our knowledge and belief and nothing has been concealed therein from this Honourable Court.

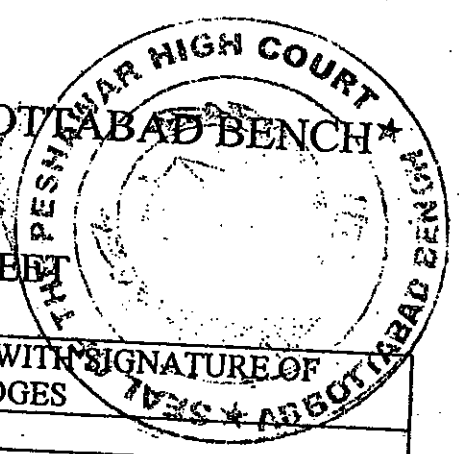
...PETITIONER


 Certified to be True Copy
 Examiner
 Peshawar High Court
 Abbottabad Bench
 Authorized Under Section 415 Ordinance

PESHAWAR HIGH COURT, ABBOTABAD BENCH

FORM 'A'
FORM OF ORDER SHEET



Date of Order or Proceedings	ORDER OR PROCEEDINGS WITH SIGNATURE OF JUDGE/JUDGES
1	2
15.11.2016	<p><u>W.P No.1038-A/2016.</u></p> <p>Present: Malik Masood-ur-Rehman Awan, Advocate, for petitioner.</p> <p style="text-align: center;">***</p> <p>Comments of respondents No.2 and 3 be called for so as to reach this Court within a fortnight.</p> <p><u>Interim Relief.</u></p> <p>Notice for 06.12.2016. In the meanwhile if the petitioner is actually performing his duty then his salary for the current month be released forthwith.</p> <p style="text-align: right;"><i>[Handwritten Signature]</i></p>

Certified to be True Copy.

Examiner
Peshawar High Court
Abbottabad Bench
Authorized Under Section 75 Acts Ordinance

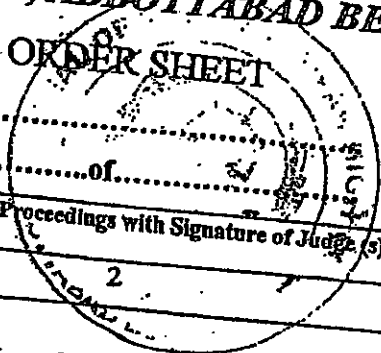
Copy of order
14-2-17

9

PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET

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



Date of Order of Proceedings	Order or other Proceedings with Signature of Judge (s)
1	
14.02.2017	<p>2</p> <p><u>W.P.No. 859-A/2016.</u></p> <p>Present: Malik Masood-ur-Rehman Awan, Advocate, for the petitioner.</p> <p>Mr. Rab Nawaz Khan, AAG alongwith Haq Nawaz ADEO Battagram.</p> <p>***</p> <p><u>IKRAMULLAH KHAN, J.-</u> Through the instant petition the petitioners of this and of the connected petitions have prayed for to undo the term and condition i.e. "the candidate having less qualification will acquire requisite training and obtain F.A qualification within three years failing which their appointment shall stand terminated automatically" and not to take any adverse action against the petitioners.</p> <p>2. The main thrust of the arguments of learned counsel for the petitioners was that similarly placed employees have been reinstated under the Sacked-Employee (Reinstatement) Act 2010, who are presently performing their duties while the services of the petitioners have been terminated which is sheer malafide on part of the respondents rather discrimination. Further stated that many of the petitioners have already acquired the requisite qualification as well as the training, but even then their services have been terminated on extraneous reasons.</p> <p>3. In such view of the matter, when serious question of</p>

Certified to be True Copy

EXAMINER
Peshawar High Court Abbottabad Bench
Authorized Under Sec: 75 Evid Ordins:

17/02/17
Sh-
M

60

minutes

Attendance

(1)

2

discrimination is being raised vehemently by the petitioners and they have also put some orders which reveal that the respondents have not adopted a uniform policy, we, with the mutual consent of the learned counsel for the parties, deem it appropriate to send all these petitions to the Secretary Education (Elementary & Secondary Education) Government of Khyber Pakhtunkhwa with direction to him to probe into the matter and finalize the appointment or otherwise of the petitioners as well as of those, who have not approached this court, through a uniform policy and if possible, after giving benefit of experience to the petitioners, their cases be disposed of within thirty (30) days from today. In case any person was found aggrieved from the order of the worthy Secretary Education then, he would be at liberty to approach the competent court of jurisdiction for redressal of his grievance. In the meanwhile, all those petitioners, who are still serving, shall be paid their due salaries till the decision of the worthy Secretary Education. All these petitions stands disposed of accordingly.

Self judge
Self judge

Certified to be True Copy

EXAMINER
 Peshawar High Court Abbottabad Bench
 Authorized Under Sec: 75 Evid Ordns:

7/10/17

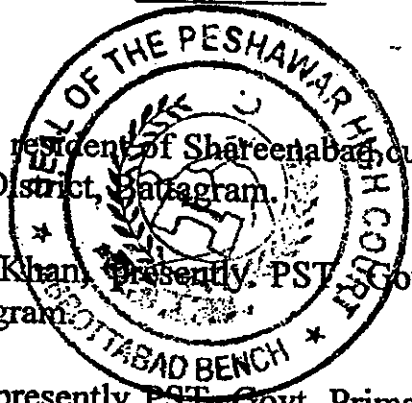
Self/

1/9
60

H

BEFORE THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH

COC No. 25 -A/2017



1. Imdadullah Khan son of Musa Khan, resident of Shareenabad, cum Kuza Banda, P.O Ghidari, Tehsil & District, Battagram.
2. Bahadur Khan son of Ali Gohar Khan, presently PST, Govt. Primary School Kanai, District Battagram.
3. Islam Shah son of Mian Gul Shah, presently PST, Govt. Primary School Garaug, District Battagram.
4. Masoom Khan son of Muhammad Naqab, presently Drawing Master (DM), Govt. Middle School, Garhi Nawab Syed, District Battagram.
5. Muhammad Shafiq son of Atiqullah, presently PST, Govt. Primary School Dabri Paimal, District Battagram.
6. Noshewan son of Noor ul Hassan, presently PST, Govt. Primary School Malkot, District Battagram.

...PETITIONERS

No. 1783
13/02/17
Checked to be True Copy
EXAMINER
28 FEB 2017
Peshawar High Court, Abbottabad Bench
Authorized Under Sec. 75 Civil Ordinance

VERSUS

Riaz Swati, District Education Officer (Male), Battagram.

...RESPONDENT/ CONTEMNOR

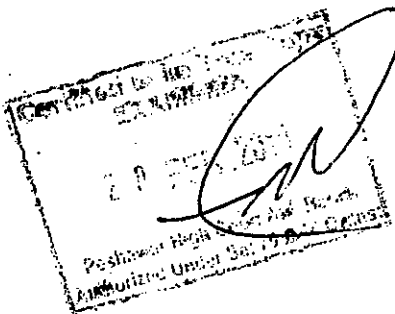
**APPLICATION UNDER ARTICLE 204 OF
THE CONSTITUTION OF ISLAMIC REPUBLIC
OF PAKISTAN, 1973, FOR INITIATING**

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH

(13)

CONTEMPT PROCEEDINGS AGAINST THE
RESPONDENT/ CONTEMNOR FOR NOT
IMPLEMENTING CONSOLIDATED
JUDGMENT/ ORDER DATED 14/02/2017
PASSED BY THIS HONOURABLE COURT IN
WRIT PETITION NO.859-A/2016 ALONGWITH
OTHER CONNECTED WRIT PETITIONS
NO.1038-A/2016, 1039-A/2016, 1040-A/2016,
1041-A/2016 AND 1042-A/2016.

PRAYER: ON ACCEPTANCE OF THE
INSTANT APPLICATION, RESPONDENT/
CONTEMNOR MAY GRACIOUSLY BE
PUNISHED IN ACCORDANCE WITH LAW
AND BE ALSO DIRECTED TO IMPLEMENT
THE CONSOLIDATED JUDGMENT PASSED
IN WRIT PETITION NO.859-A/2016 PASSED
ON 14/02/2017.



Respectfully Sheweth;-

1. That the petitioners filed writ petitions bearing No.859-A/2016, 1038-A/2016, 1039-A/2016, 1040-A/2016, 1041-A/2016

FILED TODAY

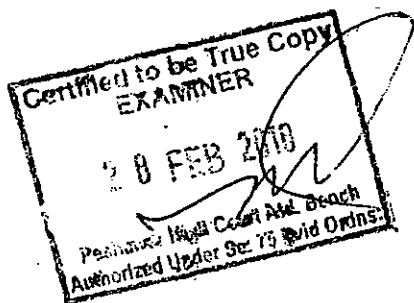
**ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT**

64
40

and 1042-A/2016 before this Honourable Court, where this Honourable Court on 14/02/2017 disposed off the all these petitions by way of consolidated judgment/ order passed in writ petition No.859-A/2016 alongwith other connected writ petition. Attested copies of the writ petition No.859-A/2016 and judgment dated 14/02/2017 are attached as Annexure "A" & "B".

2. That after passing of the judgment/ order inspite the fact that this Honourable Court clearly directed the respondent in the following terms under paragraph No.3 of the judgment, which is as under;-

"In such view of the matter, when serious question of discrimination is being raised vehemently by the petitioners and they have also put some orders which reveal that the respondents have not adopted a uniform policy, we, with the mutual consent of the learned counsel for the parties, deem it appropriate to send all these petitions to the Secretary Education (Elementary &



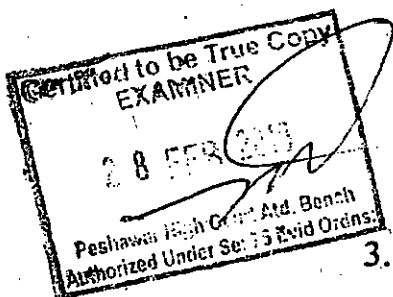
FILED TODAY

ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ARRESTED UNDER SECTION 75 OF ORDINANCE

C 13/4/16



Secondary Education) Government of Khyber Pakhtunkhwa with direction to him to probe into the matter and finalize the appointment or otherwise of the petitioners as well as of those, who have not approached this Court, through a uniform policy and if possible, after giving benefit of experience to the petitioners, their cases be disposed off within thirty (30) days from today. In case any person was found aggrieved from the order of the worthy Secretary Education then, he would be at liberty to approach the competent court of jurisdiction for redressal of his grievance. In the meanwhile, all those petitioners, who are still serving, shall be paid their due salaries till the decision of the worthy Secretary Education. All these petitions stands disposed off accordingly".




3.

That the petitioners are still performing their duties as assigning to them. Copies of abstract from attendance register are appended herewith as Annexure "C".

FILED TODAY

ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH

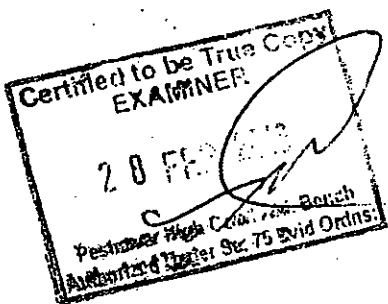
27/3/1911

66


4. That after receiving the consolidated judgment/ order passed by this Honourable Court on 14/02/2017 in writ petition No.859-A/2016, worthy Secretary (Elementary & Secondary Education), Khyber Pakhtunkhwa convened a meeting and thereby issued the following recommendation on 10/03/2017. Copy of minutes of the meeting are appended herewith as Annexure "D".

5. That the petitioners are still waiting for implementation of the recommendation made during the meeting held on 10/03/2017 vide Annexure "D".

6. That the respondent/ contemnor is duty bound to implement the judgment/ order of this Honourable Court since the petitioners are still performing their duties which is apparent vide Annexure "C" to release the salary of all the petitioners but inspite having the knowledge regarding the release of salary, the respondent/ contemnor is not



FILED TODAY

ADDITIONAL REGISTRAR
 PESHAWAR HIGH COURT
 ABBOTTABAD BENCH

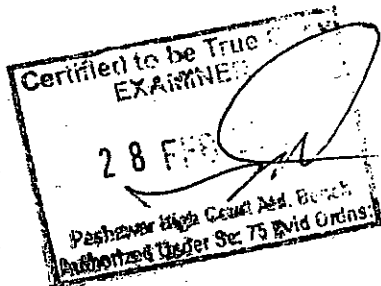
2/13/4/11

67


obeying the order/ judgment passed by this Honourable Court on 14/02/2017.

7. That the respondent/ contemnor has willfully, knowingly, intentionally and deliberately not obeyed above quoted direction of this Honourable Court and has subjected the petitioner to total confusion, pain and agony as the contemnor intend to willfully subvert such direction and hence his conduct clearly falls within the purview of Article 204 of the Constitution of Islamic Republic of Pakistan and therefore is needed to be punished in an exemplary manner as a lesson.

8. That the conduct of the respondent/ contemnor in highly contemptuous, contumacious and regrettable in willfully, knowingly and deliberately not obeying clear direction passed by this Honourable Court in the titled writ petitions and hence he is liable for maximum punishment for his conduct as provided by law.



FILED TODAY
 ADDITIONAL REGISTRAR
 PESHAWAR HIGH COURT



9. That the valuable rights of petitioners are involved.

It is, therefore, humbly prayed that on acceptance of the instant application, respondent/ contemnor may graciously be punished in accordance with law and be also directed to implement the consolidated judgment passed in writ petition No.859-A/2016 passed on 14/02/2017.

Dated: 12/04/2017

Through

[Signature]
...PETITIONERS
[Signature]
(Malik Masood ur Rehman Awan)
Advocate Supreme Court of Pakistan,
Abbottabad

VERIFICATION:

Verified that the contents of foregoing petition are true and correct to the best of my knowledge and belief and nothing has been suppressed from this Honourable Court.

FILED TODAY
[Signature]
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
21/3/17

[Signature]
...PETITIONER
Certified to be True Copy
EXAMINER
28 FEB 17
Peshawar High Court
Authorized Under Sec. 75 of 1973

سال: ۱۳۹۷
شماره: ۵۶۶۱

شماره: ۶۹۹۲۵۳ (۷۹)

بابت ماه: شهری
شماره: ۳۲۵۹۰۸

نام: محمد اکبر خاندان P.S.H.T	سازمان: سازمان اسناد و کتابخانه ملی	کارشناس: عامر سید کاظم
عهد: اول مرتب	تاریخ: تاریخ مرتب	شماره: ۵۳۰۶۵۶۴۰۲۴۱
فول: ۰۳۱۳۳۸۶۹۰۳۹		

قوی شناختی کار و شماره:

ردیف	اد	دستخط	ارائی	دستخط	اد	دستخط	ارائی	دستخط	اد	دستخط	ارائی	دستخط	اد	دستخط	تاریخ
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Calomel Ballotage

Medical Meeting in CAPS
Persian on 12.11.97
from 9.00 to 12.30 PM

شماره	حالت	سابقه	میزان	حالت	سابقه	میزان	حالت	سابقه	میزان	حالت	سابقه	میزان
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5	X	X	X	X	X	X	X	X	X	X	X	X

دستخط میزبان: ...

شماره پان ۲۰۱۷

شماره ۶۹۹۲۵۳

74

شماره ۳۹۵۹۰۸

بایستگاه

نام: محمد اکبر خات	پستاد رضا آ. آ. آ.	عام رسیدگان
عهد: اول مدرسه	ژانر: ...	پتو کپور
فون نمبر: ۰۳۱۳۵۸۶۹۰۳۹	۰۳۰۶۵۶۴۰۲۰۰۰	
قومی شناختی کارڈ نمبر: ۱۳۲۰۲۰۵۶۶	۱۳۲۰۲۰۵۶۶	

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
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دستخط میزبان

نام و نام خانوادگی	مهره افشار	مهره افشار
پست	معاونت	معاونت
شماره پرسنلی	03065640	03135869039
شماره حساب	13202-072253	13202-072253

تاریخ	آد	دستخط	روایی	دستخط	آد	دستخط	روایی	دستخط	آد	دستخط	روایی	دستخط	آد	دستخط	روایی	دستخط	تاریخ
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دستخط مباشرت:

ستاف حاضری رجسٹر

سال: 2017
نمبر: 005661

نمبر: 699253

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پابندی: 0032590
نمبر: 0032590

عامر حسن	پنا درخان PST	آ: نرگس خان H.T PST	پہلو علی
پونہ	نائب سب	"	"
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روز	آد	دستخط	روائی	آد	دستخط	روائی	آد	دستخط	روائی	آد	دستخط	روائی	آد	دستخط	روائی	آد	دستخط	روائی	آد	دستخط	روائی	
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میزان	سال	حال	میزان	سال	حال	میزان	سال	حال	میزان	سال	حال	میزان	سال	حال

دستخط: _____



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DISTRICT BATTAGRAM

Email: emisbattagram@gmail.com Ph# 0997-543539/ 543540



OFFICE ORDER

1. Whereas you the following Ex PSTs (Sacked Employee) were appointed vide order Endst; No. 7825-31 dated 15-02-2013 in the light of Khyber Pakhtunkhwa Sacked Employees (Appointment) Act-2012 with the condition that "The candidates having less qualification will acquire requisite training and obtain FA qualification within three (03) years failing which their appointments shall stand terminated automatically" incorporated in your appointment order in the light of order dated 25-05-2011 of Hon'ble Supreme Court of Pakistan in Civil Appeals No. 51-P and 52-P of 2009 as "The appellants shall be appointed as P.S.T (Primary School Teacher) in their respective Union Councils immediately and in case the appellants fail to acquire the training and the said qualification within three years, their appointment shall stand terminated automatically".
- Bahadar Khan S/O Ali Gohar Khan Ex PST GPS Mukhtiar Abad
 - Muhammad Hayat S/O Muhammad Noor Ex PST GPS Landi Kass
 - Noshawan S/O Noorul Hassan Ex PST GPS Malkot
 - Zebat Khan S/O Mubaras Khan Ex PST GPS Piza Batkool
 - Imdadullah Khan S/O Musa Khan Ex PST GPS Barmai
 - Shahi Khan S/O Bai Khan Ex PST GPS Peshora
 - Muhammad Riaz S/O Ghulam Husain Ex PST GPS Trangan
 - Khurshed Khan S/O Muhammad Arshad Khan Ex PST GPS Deshwal
 - Islam Shah S/O Mian Gul Shah Ex PST GPS Ranja
 - Rustam Khan S/O Palas Khan Ex PST GPS Sangu
 - Rustam Khan S/O Begrah Khan Ex PST GPS Nerai Thakot
 - Muhammad Shafiq S/O Atiqullah Ex PST GPS Chattoo
2. And whereas you failed to fulfill terms and conditions of your appointment order i.e could not acquire requisite qualification within stipulated period of three years as per condition No. 7 of your appointment order, resultantly your appointments/services stood terminated automatically.
3. And whereas a general Notification Endst; No. 137-43 dated 04-01-2017 was issued/circulated wherein it was clarified that, "those (Sacked Employees) who failed to fulfill the requisite qualification for the post within stipulated period of three years from the date of issuance of their appointment orders, their services stood terminated automatically and they are no more civil servants/on the strength of Department".
5. And whereas you filed Writ Petitions before Peshawar High Court Abbottabad Bench which were disposed of on 14-02-2017 with the direction to Secretary E&SE Khyber Pakhtunkhwa for making a uniform policy.
6. And whereas in compliance with the directions of Hon'ble Court dated 14-02-2017, all the DEOs (Male & Female) were directed by the E&SE Department Khyber Pakhtunkhwa vide letter No. SO (Lit-1) E&SE/1-1/2017/Sacked Employees dated 10-11-2017 to follow strictly the provision as mentioned in Sections-2(g), 3 and 7 of Khyber Pakhtunkhwa Sacked Employees (Appointment) Act-2012.
7. And whereas you filed Contempt of Court Petitions before the Hon'ble court which were disposed of on 11-01-2018 with the direction to undersigned to decide the case of petitioners within 30 days.

8/1/18
SECRETARY

Now in the light of direction of Hon'ble Peshawar High Court Abbottabad Bench dated 11-01-2018, the undersigned is pleased to decide your case and to issue this order in continuation of Notification dated 04-01-2017 that as per condition No. 7 of your appointment order and in the light of Judgment of Peshawar High Court Abbottabad Bench dated 24-05-2016 in W.P.NO. 516-A of 2013 as well as order of Hon'ble Supreme court of Pakistan dated 24-05-2017 in C.P. 401 and connected Petitions. your services had stood terminated automatically and you remained no more on the strength of this Department.

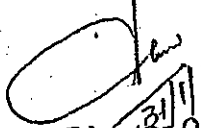
District Education Officer (Male)
Battagram

Dated. 31-01-2018

Endst: No.1305-10/EB/Pry/Sacked Employees.

Copy for information to the.

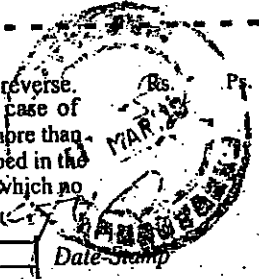
1. Additional Registrar Peshawar High Court Abbottabad Bench.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Deputy Commissioner Battagram.
4. District Monitoring Officer (IMU) Battagram.
5. Sub Divisional Education Officers (Male) Battagram & Allai.
6. All the above mentioned Ex PSTs.


21/1/18
District Education Officer (Male)
Battagram

84. N-1-135

No. 560

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.



Received a registered* addressed to _____

Date Stamp

*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Initials of Receiving Officer } Insured for Rs. (in figures) _____ (in words) _____

Insurance fee Rs. _____ Ps. _____ (in words) } Weight } Kilo } Grams } 1/3

Name and address of sender } _____ } _____ } _____ }

بخدمت جناب ڈائریکٹر صاحب محکمہ تعلیم سیکنڈری ایجوکیشن، پشاور

حکماذہ اجیل

جناب عالی!

سائیلان حسب ذیل عرض رساں ہیں۔

گزارش کی جاتی ہے کہ سائیلان سال 1993، 1994 میں بھرتی ہوئیں ہیں اور تقریباً چار سال بعد سیاسی سائیلان پر سال 1997 میں سائیلان کو برطرف کیا گیا۔ صوبائی حکومت نے 2012 میں ایک ایکٹ پاس کیا جس کے تحت 20 سالوں میں سائیلان کو دوبارہ سروس پر بحال کر دیا گیا۔ آرڈر ایٹھ ہوتے وقت جناب ڈی۔ای۔ او صاحب نے ایکٹ سے سائیلان کو اپنی طرف سے تین سال میں پی۔ٹی۔سی اور ایف۔اے کی شرائط رکھ دی اور اس دوران پی۔ٹی۔سی اور ایف۔اے کے عمل کرنے کی سورت میں تین سال بعد خود بخود سروس سے ٹرمینٹ تصور کیا جائیگا۔

جناب عالی!

سائیلان نے پی۔ٹی۔سی اور ایف۔اے چار ماہ بعد مکمل کی جبکہ جناب ڈی۔ای۔ او صاحب بنگرام نے یہاں کی تنخواہیں اگست 2016 سے بند کر دی۔ سائیلان ابھی تک اپنی ڈیوٹیاں سرانجام دے رہے ہیں جبکہ جناب ڈی۔ای۔ او صاحب بنگرام نے مورخہ 31/01/2018 کو سائیلان کے ٹرمینٹ آرڈر جاری کر دیئے۔ سائیلان ایک نئے اور انتہائی قریب ملائے اور غریب گھرانوں سے تعلق رکھتے ہیں اور سائیلان کے کندوں پر خاندان کی تمام ذمہ داریاں سائیلان کے پاس کوئی دوسرا آمدن کا ذریعہ نہیں ہے۔ سائیلان کے پاس اپنے تمام مکمل مطلوبہ کوائف موجود ہیں۔

لہذا حضور سے استدعا ہے کہ سائیلان کو چار ماہ کی پی۔ٹی۔سی ایٹ پاس کرنے کی رعایت فرمائی جائے اور ہماری تنخواہیں اور سروس بحالی کی اجازت دی جائے سائیلان اور سائیلان کا خاندان تاحیات دعا گو رہے گا۔

(المرقوم: 16/03/2018)

سائیلان اور خواست گزاران

بادشاہ خان پی ٹی سی / ایف اے / جی پی ایس بختیار آباد (0306-5640241)

محمد شفیق پی ٹی سی / ایف اے / جی پی ایس، چنؤ (0336-1153533)

اسلام شاہ پی ٹی سی / ایف اے / جی پی ایس، رانجھا (0310-5267104)

نوشیروان پی ٹی سی / ایف اے / جی پی ایس، ملکوٹ (0301-8123642)

ابو ادا اللہ پی ٹی سی / ایف اے / جی پی ایس برمائے (0344-9155463)

موسوم خان DM، ایف اے / جی پی ایس، گڑھی نواب سید (0300-9712967)

تخصیل و ضلع بنگرام ہزارہ

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)

BATTAGRAM

753 /EB/Pry Dated

Battagram: 10/05/2018

87

To

The Director
(E&SE) Khyber Pakhtunkhwa
Peshawar.

Subject:- DEPARTMENTAL APPEAL.

Memo:-

Reference Copy of appeal (Attached)

1. The following appellants Ex-PSTs (Sacked Employees) were appointed vide order Endst No.7825-31 Dated 15/02/2013 in the light of Khyber Pakhtunkhwa Sacked Employees (Appointment) Act-2012 with the condition that "The candidates having less qualification will acquire requisite training and qualification intermediate within three (03) years failing which their appointments shall stand terminated automatically".(Appointment Order attached A-1)
2. The appellants failed to fulfill terms and conditions of their appointment order i.e. could not acquire requisite qualification within stipulated period of three years as per condition No.7 of their appointment order.(Appointment Order attached A-1)
3. The appellants filed contempt of Court Petitions of Hon,ble court which were disposed of on 11/01/2018 with the direction to undersigned to decide the case of petitioners within 30 days.
4. In the light of direction of Hon,ble Peshawar High Court Abbottabad Bench dated 11/01/2018, the undersigned is pleased to decide the case and to issue order in continuation of Notification dated 04/01/2017. that as per condition No.7 of their appointment order and in the light of judgment of Peshawar High Court Abbottabad Bench dated 24/05/2016 in W.P No.516-A of 2013 as well as order of Hon,ble Supreme Court of Pakistan dated 24/05/2017 in C.P. 401 and connected petitions, The services had stood terminated automatically and they remained no more on the strength of this Department vide order No: 13503-10/EB/Pry/Sacked Employees dated 31-01-2018.(Copy attached B-1)
5. Position of acquiring qualification of the following appellants is as under.

S N O	NAME	ORDER DATE	PASSING FA	DEEDLINE FOR ACQUIRING ACAD/PROF QUALIFICATI ON PASSING PTC	DATE OF PASSING PTC	DIFFERENCE BETWEEN PASSING PTC/ACQUIR E TIME	Remarks (Documents Attached and marked as)
1	Bahadar Khan	15-02-2013	1993	14-02-2016	10-01-2017	08 Months 27 days	C-1 to C-11
2	Muhammad Shafiq	15-02-2013	05-12-2014	14-02-2016	10-01-2017	08 Months 27 days	D-1 to D-6
3	Islam Shah	15-02-2013	06-08-2015	14-02-2016	10-01-2017	08 Months 27 days	E-1 to E-6
4	Nosharwan	15-02-2013	05-12-2014	14-02-2016	10-01-2017	08 Months 27 days	F-1 to F-7
5	Imdadullah	15-02-2013	-	14-02-2016	12-01-2015	-	G-1 to G-12
6	Masoom Khan DM	15-02-2013	26-02-2015 BA	14-02-2016	20-02-2015 DM	Differenc e. between DM/BA 6 days-	H-1 to H-8

In view of the above, the case of the appellants is submitted for perusal and further process please.

DISTRICT EDUCATION OFFICER
(MALE) BATTAGRAM

2018



**OFFICE OF THE
DISTRICT EDUCATION OFFICER
(MALE) BATTAGRAM**

89

NO 11790-46 Dated: 19/10/2018

To

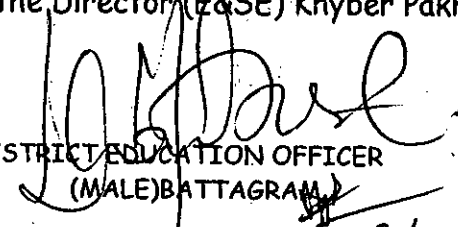
The Appellants

1. Bahadar Khan Ex-PST Village Dharian Tehsil & District Battagram.
2. Muhammad Shafiq Ex-PST Village Dabrai Paimal Sharif Tehsil & District Battagram
3. Islam Shah Ex-PST Village Kaktai (Bandigo) Tehsil & District Battagram.
4. Masoom Khan Ex-DM Village Gijbori Tehsil & district Battagram.
5. Imdad Ullah Ex-PST Village Gidri Shireen Abad Tehsil & District Battagram.

Subject:- DEPARTMENTAL APPEAL.

Memo:-

Reference Director (E&SE) Khyber Pakhtunkhwa Peshawar No.2508 F.No. Sacked Employees of District Battagram Dated Peshawar the 26/9/2018 on the subject cited above, you are hereby inform that your joint appeal has already been rejected and your joint review appeal dated nil has been filed by the Director (E&SE) Khyber Pakhtunkhwa Peshawar.


DISTRICT EDUCATION OFFICER
(MALE) BATTAGRAM


19/10/18

EndstNo: _____ EB /Pry F:Term of Sacked Employees Dated _____ 2018.

Copy for information:-

1. Director (E&SE) Khyber Pakhtukhwa Peshawar.

Endst: No 848-52 dt 22-10-2018


DISTRICT EDUCATION OFFICER
(MALE) BATTAGRAM

Forwarded in original to
ASDEOs concerned for further M/A
and Inform Thm above Ex-PSTs in time.

SDEO (MALE)
Battagram

وکالت نامہ

(96)

کورٹ فیس

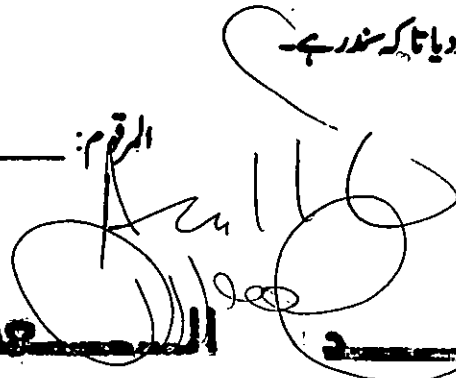
بمدالت سروس ٹریڈنگ کمپنی پرائیویٹ لٹڈ
عنوان: بہادر خان بیم گورنمنٹ آف پاکستان وغیرہ
منجانب: علی احمد
نوعیت مقدمہ:

باعث تحریر آنک

مقدمہ مندرجہ میں اپنی طرف سے واسطے جبردی و حجاب دہی کل کاروائی متعلقہ آں مقام
صک مسعود المرطالی. احوال البرو و گولڈ سیرنگ ٹریڈنگ کمپنی پرائیویٹ لٹڈ
کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب
موصوف کو کرنے راضی نامہ و تقررہ نٹ و فیصلہ بر طرف دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء
دھولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دخل کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور
کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا محکمہ صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار
بھی ہوگا اور صاحب مقرر شدہ کو بھی دہی اور روپیہ ہی اختیارات ہوں گے اور اس کا ساختہ پر داخلہ مجھ کو منظور
قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہر جانہ الخوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے
نیز چھاپا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی ذیلی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف
پابند ہوں گے کہ جبردی مقدمہ مذکورہ کریں اور اگر محکمہ مقرر کردہ میں کوئی جزو چھاپا ہو تو وکیل صاحب موصوف
مقدمہ کی جبردی کے پابند نہ ہوں گے۔ نیز درخواست بمواد تجارت پائلٹ بیسٹنہ مطلقہ کے دائرہ کرنے اور اس کی
جبردی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند ہے۔

بمقام: 14/1/19 الرقم:



بہادر خان

گفتو رفاہ - اسٹیڈیئر صاحب سرور کی سرپرستی میں لکھی گئی

سرور کی اسٹیڈیئر
68/19

صاحب کا

گفتو رفاہی عرضیہ میں کام ہو چکا ہے۔ لکھی گئی ہے

کہ سندھ بلڈ اینڈ اینڈ جوائنٹ عمارت کا 20

میں ہی ہوگی

گفتو رفاہی

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