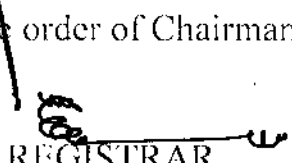


FORM OF ORDER SHEET

Court of _____

Case No.- 300/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09/02/2023	<p>The appeal of Mr. Muhammad Arif Khan presented today by Mr. Allah Yar Khan Tareen Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman  REGISTRAR</p>

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHAWA

Appeal No 300 /2023

Muhammad Arif Khan vs Director and others

APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER ISSUED UNDER ENDST: NO. 2992-95/E.NO 6-6/EB/TRANSFER DATED 06-09-2022 BY THE RESPONDENT NO. 2 WHEREBY THE APPELLANT WAS TRANSFERRED FROM THE POST OF CT GHS KHOLIAN BALA TO GHS BAGHPUR DHERI AND AGAINST THE PRESUMPTIVE REJECTION OF THE APPELLANT'S DEPARTMENTAL APPEAL BY THE RESPONDENT NO. 01.

INDEX

<u>Sr. No</u>	<u>Description of Documents</u>	<u>Annexure</u>	<u>Pages</u>
1	Memo of Appeal		1-12
2	Copy of Transfer Order Dated 06-04-2017	A	13-14
3	Copy of Transfer Order Dated 15-12-2018	B	15
4	Copy of Transfer Order Dated 17-06-2019	C	16
5	Copy of Order Dated 18-06-2019 passed by Honorable Tribunal	D	17-18
6	Copy of impugned transfer order dated 06-09-2022	E	19
7		F	

	Copy of departmental appeal	F	20
8	Copy of Adjustment Order pertaining to one Rashid Mehmood and others	G	21
9	Copy of withdrawal order of Waris CT and others	H	22
10	Relevant record for application for condonation of delay	I	23-26
11	Wakalat Nama	J	27

Through



Allah Yar Khan Tareen

Advocate High Court

Abbottabad

BC No. 21-4361

Email: allahyarkhan931@yahoo.com

Mobile No. 0334-4064491

Dated:

(1)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHAWA

Appeal No. 300 /2023

Muhammad Arif Khan s/o Jan Muhammad Khan r/o Village Gheba, Post Office Sarai Saleh, Tehsil and District Haripur Currently posted as CT GHS Bagh Pur Dheri.

Appellant

Versus

1. Director Elementary and secondary Education, Khyber Pakhtunkhawa, Peshawar.
2. District Education Officer (Male) Haripur.

Respondents

APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER ISSUED UNDER ENDST: NO. 2992-95/E.NO 6-6/EB/TRANSFER DATED 06-09-2022 BY THE RESPONDENT NO. 2 WHEREBY THE APPELLANT WAS TRANSFERRED FROM THE POST OF CT GHS KHOLIAN BALA TO GHS BAGHPUR DHERI AND AGAINST THE PRESUMPTIVE REJECTION OF THE APPELLANT'S DEPARTMENTAL APPEAL BY THE RESPONDENT NO. 01.

PRAYER:

On acceptance of this Appeal, the impugned order may graciously be set aside being tainted with malafide and being authoritatively predisposed to target the appellant selectively under the garb of tenure policy.

(2)

Any other relief which this Honorable tribunal deems appropriate may also be granted in the interest of Justice.

Respectfully submitted:

The appellant seeks to make following submissions:

1. That the appellant was appointed as PST in the year 1989 and in due course of time, he was promoted to the post of PSHT in the year 2012 and further promoted to the Post of CT in year 2017. He throughout his service performed his duty with full zeal and zest leaving no room for any objection.
2. The appellant served in different School including GPS Sumbal Mohri and GPS Sarral and other Schools. On 06-04-2017 the Appellant was transferred from GPS Sarral to GHS Kholian Bala. (Copy of Transfer Order is annexure A)
3. That although, the appellant had not completed his regular tenure and was performing his duties without any complaint in GHS Kholian Bala, he was transferred from the said school to GHS Dartian, which was a hilly and far flung area meant for punitive transfers in the departmental circles. The appellant preferred a departmental appeal and upon presumptive rejection of the said appeal, he filed Service Appeal No. 487/2019 against the order Dated: 05-12-2018. During the pendency of said Appeal, the appellant was transferred from GHS Dartian to GHS Kholian Bala on 17-06-2019 and the Service Appeal having served its purpose was withdrawn. (Copy of Transfer Order Dated 15-12-2018 is annexure B. Copy of Transfer Order Dated 17-06-2019 is Annexure C and Copy of Order of this Honorable Tribunal Dated 18-06-2019 is annexure D)
4. That the appellant has been transferred from GHS Kholian Bala to GHS Baghpur Dehri vide order dated 06-09-2022 of the Respondent No. 2 citing the reason of the completion of normal tenure. The appellant being aggrieved by this order preferred a departmental Appeal before

(3)

Respondent No. 01 which remained undecided till expiry of 90 days meant for presumptive rejection of the departmental appeal. (Copy of impugned order and departmental appeal are annexure E and F respectively)

5. That the appellant being reasonably aggrieved from the impugned transfer order and from the inaction of respondent No. 1 in respect of departmental appeal, seeks to impugn the same on following grounds, inter alia, follow hereinafter:-

GROUNDS:

1. That in the impugned order contains a specific name of the appellant as to his completion of tenure while in the case of other teachers transferred by the same order and having unusually long tenure; reference to completion of tenure has not been given for the reason best known to the respondent No. 2. Selective reference of the completion of tenure by the appellant is obviously tainted with some hidden motive and authoritative bias against him, which he believes to be for the reason that appellant preferred the course of seeking judicial review of the previous transfer order instead of getting favors through extraneous and political pressure which is usually honored by the departmental authorities against the judicial intervention.
2. That it is an open secret that use of extraneous and political influence is prohibited under the service conditions of a government servant but use of such influence is never complained about by the higher authorities and is accepted quite conveniently to please the political masters. It is open to the appellant that his previous transfers and present one were made to please some political masters but the appellant then had and now has the same resolve to seek judicial review of the impugned transfer instead of succumbing to the desire of getting favors of political masters and to give political support to them in return. If it would be levelheaded for the appellant to use of political influence against the respondents in clear violation of service conduct, he would have no need to approach this Hon'ble Tribunal because

(4)

those transferred with the appellant in the impugned order have been well adjusted by the Respondent No. 2 as per detail given below:-

- i) The impugned transfer order to the extent of one Rashid Mehmoodat Sr. No. 4 stands modified and he has been adjusted on the same date and posted in another school of choice for the reasons best known to the Respondent No. 02. (Copy of Adjustment Order is Annexure G.)
 - ii) Similarly vide adjustment order Annexure G, one Waris at Sr. No. 01 and Yasir at Sr. No. 04 along with others were transferred and thereafter the adjustment order pertaining to said two persons was withdrawn on 09-09-2022, by the respondent No. 02 for the reasons best known to him. (Copy of said withdrawal order is annexure H)
3. That the adjustment of other transferees after the impugned order and keeping the transfer of the appellant intact is against the principle of intelligible differentia when the teachers benefited with the adjustment subsequent to the impugned transfer order were not at a better rung than that of the appellant. Therefore, the fundamental rights of the appellant as enshrined in the Constitution of Islamic Republic of Pakistan have gravely been infringed.
 4. That the acts of respondent No. 02 are against the law, facts and is result of colorful exercise of jurisdiction at the part of respondent No. 02.
 5. That there are instances in the District Haripur, where the teachers remained posted in the same schools till their retirement. At the time of the impugned order there were many teachers who had completed their tenure and are there for a long time without interruption or if transferred they were favorably adjusted. Therefore the transfer of the appellant was not result of homogenous process.
 6. That the impugned order of the appellant is result of extraneous pressure which is unwarranted in law and practice.

(5)

7. That the acts of Respondent No. 02 are illegal, unlawful, arbitrary and fanciful and the transfer of the appellant was also the consequence of arbitrariness, hence liable to be undone and set aside.

8. That further points will be raised during the course of arguments, with the permission of this Honorable Court.


PRAYER:

On acceptance of this Appeal the impugned order may graciously be declared null and void being against the law and facts, result of arbitrariness, mala fide and malice.

Any other relief which this Honorable tribunal deems appropriate may also be granted in the interest of Justice.


Appellant

Through


Allah Yar Khan Tareen
Advocate High Court

(6)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHAWA

Appeal No. _____/2023

Muhammad Arif Khan vs Director and others

APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER ISSUED UNDER ENDST: NO. 2992-95/E.NO 6-6/EB/TRANSFER DATED 06-09-2022 BY THE RESPONDENT NO. 2 WHEREBY THE APPELLANT WAS TRANSFERRED FROM THE POST OF CT GHS KHOLIAN BALA TO GHS BAGHPUR DHERI AND AGAINST THE PRESUMPTIVE REJECTION OF THE APPELLANT'S DEPARTMENTAL APPEAL BY THE RESPONDENT NO. 01.

ADDRESSES OF THE PARTIES

Respectfully sheweth:


The addresses of the parties are as under:

Appellant:


Muhammad Arif Khan s/o Jan Muhammad Khan r/o Village Gheba, Post Office Sarai Saleh, Tehsil and District Haripur Currently posted as CT GHS BaghPurDheri, Haripur.

RESPONDENTS:

1. Director Elementary and secondary Education, Khyber Pakhtunkhawa, Peshawar.
2. District Education Officer (Male) Haripur.


Appellant

Through


Allah Yar Khan Tareen
Advocate High Court

Dated:

(7)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHAWA

Appeal No. _____/2023

Muhammad Arif Khan vs Director and others

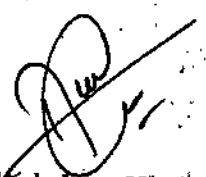
APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER ISSUED UNDER ENDST: NO. 2992-95/E.NO 6-6/EB/TRANSFER DATED 06-09-2022 BY THE RESPONDENT NO. 2 WHEREBY THE APPELLANT WAS TRANSFERRED FROM THE POST OF CT GHS KHOLIAN BALA TO GHS BAGHPUR DHERI AND AGAINST THE PRESUMPTIVE REJECTION OF THE APPELLANT'S DEPARTMENTAL APPEAL BY THE RESPONDENT NO. 01.

CERTIFICATE:

Certified that no such Service Appeal has earlier been filed before this Honorable Tribunal.

Appellant

Through


Alfah Yar Khan Tareen
Advocate High Court

Dated:

(8)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHAWA

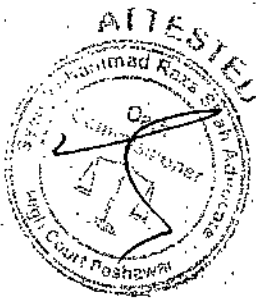
Appeal No. _____/2023

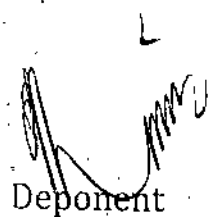
Muhammad Arif Khan vs Director and others

APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER ISSUED UNDER ENDST: NO. 2992-95/E.NO 6-6/EB/TRANSFER DATED 06-09-2022 BY THE RESPONDENT NO. 2 WHEREBY THE APPELLANT WAS TRANSFERRED FROM THE POST OF CT GHS KHOLIAN BALA TO GHS BAGHPUR DHERI AND AGAINST THE PRESUMPTIVE REJECTION OF THE APPELLANT'S DEPARTMENTAL APPEAL BY THE RESPONDENT NO. 01.

AFFIDAVIT

I, Muhammad Arif Khan s/o Jan Muhammad Khan r/o Village Gheba, Post Office Sarai Saleh, Tehsil and District Haripur Currently posted as CT GHS BaghPurDheri, HaripurAppellant, do hereby declare on oath that the contents of the instant Service appeal are true and correct to the best of my Knowledge and belief and nothing has been concealed from this Honorable Tribunal.




Deponent

Dated:

(9)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHAWA

Appeal No. _____/2023

Muhammad Arif Khan vs Director and others

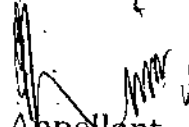
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APPLICATION FOR INTERIM RELIEF:

Respectfully submitted:

1. That the abovementioned appeal is filed before this Honorable Tribunal.
2. That the appellant has a strong case and there is every likelihood of his success.
3. That the valuable rights of the appellant are involved hence grant of interim relief is necessary.
4. is further humbly prayed that the impugned transfer Order may graciously be suspended till the final decision of the instant appeal in the interest of Justice.

Through


Appellant


Counsel

Dated:

(10)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHAWA

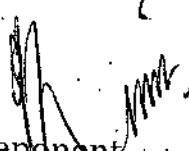
Appeal No. _____/2023.

Muhammad Arif Khan . vs Director and others

APPLICATION FOR INTERIM RELIEF

AFFIDAVIT

I, Muhammad Arif Khan s/o Jan Muhammad Khan r/o Village Gheba, Post Office SaraiSaleh, Tehsil and District Haripur Currently posted as CT GHS BaghPurDheri, Haripurpetitioner, do hereby declare on oath that the contents of the above application are true and correct to the best of my Knowledge and belief.


Deponent

Dated:



(11)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHAWA

Appeal No. _____/2023

Muhammad Arif Khan vs Director and others

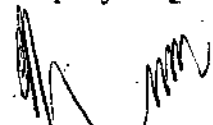
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APPLICATION FOR CONDONATION OF DELAY

Respectfully Submitted:

1. That above mentioned appeal has been filed before this Honorable Tribunal.
2. That the delay in filing of instant Service Appeal has occurred due to the illness of the Appellant. (Relevant record is annexure I).
3. That the delay was beyond the control of the Appellant and is bona fide.
4. That the valuable and fundamental rights of the Appellant are involved.
5. That further points will be raised during the course of arguments.

It is therefore humbly prayed that the delay incurred in the filing of service appeal may kindly be condoned in the interest of Justice, equity and fair play. ✓


Petitioner

Through


Counsel

Dated:

(12)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHAWA

Appeal No. _____/2023

Muhammad Arif Khan vs Director and others

APPLICATION FOR CONDONATION OF DELAY

AFFIDAVIT

I, Muhammad Arif Khan s/o Jan Muhammad Khan r/o Village Gheba, Post Office Sarai Saleh, Tehsil and District Haripur Currently posted as CT GHS Bagh Pur Dheri, Haripur petitioner, do hereby declare on oath that the contents of the above application are true and correct to the best of my knowledge and belief.

Deponent

Dated:



(105) Annexure (A)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) HARIPUR

Promotion Order

Consequent upon the Selection of candidates by the Departmental Committee in its meeting held on 05-04-2017 and approval of the competent authority, and acceptance of appeal, the following trained PSHT (B-15) & SPST (B-14) to CT post are hereby ordered in BPS-15 (Rs. 13510-1120-47110) with usual allowances on regular basis as per new service structure promotion of CT post on seniority cum fitness base, as notified by the Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department Peshawar vide notification no. SO (PE) 4-5/SSRC /VOL:III dated 18/01/2011 & revised notification dated 16/06/2011 in the Schools as noted against each their name on the terms and conditions mentioned below w.e.f date of taking over charge in the best interest of public service.

S.No	Sen:NO	Name of Teacher	Name of School	D/O Apptt:as regular PST	Place of Posting	Remarks
1	201	Muhammad Ajmal Khan	GPS No 2 Sec:3 KTS	31/01/1989	GMS New Mumaiya	Against Vacant Post.
2	320	Khalid Mehmood	GPS No 2 Sec:KTS	2/4/1992	GHSS Bareela	Against Vacant Post.
3	365	Taqi ur Rehman	GPS No 1 Sec:1 KTS	13/01/1993	GHS TT ship	Against Vacant Post.
4	401	Muhammad Arif Khan	GPS Sarrai	5/3/1994	GHS Kholian Bala	Against Vacant Post.
5	471	Ahmad Zaman	GPS Pind Jamal Khan	11/4/1995	GHSS Sarai Saleh	Against Vacant Post.
6	488	Muhammad Rafique	GPS Dhamu, Ghazi	28-05-1994	GMS Khoi Maira	Against Vacant Post.
7	514	Asif Khan	GPS Kheri	25/10/1995	GHS Sirya	Against Vacant Post.
8	535	Muhammad Zahfran	GPS Banda Muglan	1/7/1997	GMS Nilore	Against Vacant Post.
9	553	Fida Muhammad	GPS GEMPS No 1 KTS 3	13/0/1994	GHS Kangra	Against Vacant Post.
10	557	Inyat Ullah Khan	GPS Sarai Sadi	22/10/1989	GHSS Dingi	Against Vacant Post.
11	572	Waheed Iqbal	GPS Sirya	1/4/1996	GHS Kot Nabiullah	Against Vacant Post.
12	578	Khursheed Ahmad	GMPS Nlay Wala	1/7/1997	GHS Tofkian	Against Vacant Post.
13	583	Ajmal Hussian	GPS No 1 Sec 01 KTS	1/7/1997	GHS Alooli	Against Vacant Post.
14	588	Naveed Ahmad	GPS Komal Payeen	7/1/1997	GHS Jabri	Against Vacant Post.
15	589	Naeem Shahzad	GPS Nikkah Pah	1/7/1997	GHS Kholian Bala	Against Vacant Post.
16	592	Wajid	GPS Chechian	1/7/1997	GMS Q Dhak	Against Vacant Post.
17	611	Abrar Shah	GPS Kandal	1/7/1997	GHSS Sirikot	Against Vacant Post.
18	626	Sultan Ahmad	GEMPS No 1 sec:No 3 KTS	8/7/1997	GHS KTS Sec: 3	Against Vacant Post.
19	632	Tahir Siddique	GPS Ahia Hattar	13/07/1997	GMS Tarar	Against Vacant Post.
20	634	Khan Nawaz	GPS Todo	1/8/1997	GHSS Dingi	Against Vacant Post.
21	645	Abdul Khanan	GEMPS No 1 Sec:3 KTS	1/8/1997	GHS KTS No. 3	Against Vacant Post.
22	660	Shakeel Ahmad	GPS Piplala	4/8/1997	GHS Ghazi	Against Vacant post
23	672	Arshad Amin Khan	GPS Chitri	11/4/2000	GHS Kheri	Against Vacant Post.
24	678	Muhammad Naheem	GPS Sheikh Chor	12/4/2000	GHS Qazipur	Against Vacant post
25	694	Wasim Akhtar	GPS Kot Najeebullah	13/04/2000	GHS Kot Nabiullah	Against Vacant post
26	699	Muhammad Perviaz	GPS No. 3 Haripur	14/04/2000	GMS Mirpur	Against Vacant post
27	706	Nisar Ahmad	GPS Dheri Sikandar pur	14/04/2000	GMS Pharahalla	Against Vacant Post.
28	715	Ibrar Hussian Shah	GPS Mohri pir Baksh	14/04/2000	GHS Ladha	Against Vacant Post.
29	716	Jamial Akhtar	GPS alooli	14/04/2000	GMS S.Dharam Pani	Against Vacant Post.
30	718	Naseer Ahmad	GPS Nilore	14/04/2000	GHS Noorpur	Against Vacant Post.

[Signature]

06/04/17

(14)

31	721	Farooq Ehali	GPS Kot Najibullah	14/04/2000	GMS Joulain	Against Vacant Post.
32	733	Saeed Asghar	GPS Talhala	15/04/2000	GHS Kokotri	Against Vacant Post.
33	737	Muhammad Waheed	GPS Batrasi	15/04/2000	GHSS Kahal	Against Vacant Post.
34	755	Syed Ahmad Raza	GPS Chapri Maria	17/04/2000	GHS M.D.Maria	Against Vacant Post.
35	768	Nusrat Iqbal	GPS Bajeeda	18/04/2000	GMS Bandi Mian Pirdad	Against Vacant Post.
36	777	Mufeed Shah	GPS Kot Najibullah No 1	19/04/2000	GMS Khan pur	Against Vacant Post.
37	778	Riasat Ali	GPS amgah	19/04/2000	GHS Amgah	Against Vacant Post.
38	781	Muhammad Perviaz	GPS Ghumawan	20/04/2000	GMS Tarar	Against Vacant Post.
39	782	Gohar Zaman	GPS Paki Ban	20/04/2000	GMS Kala Katha	Against Vacant Post.
40	783	Muhammad Ishtiaq	GPS Bhutri	17/10/2000	GHS No. 2, Haripur	Against Vacant Post.

Terms & Conditions.

1. They will be governed by such rules & regulations as may be issued from time to time by the Government.
2. Their services can be terminated as any time, in case their performance is found unsatisfactory, misconduct, they will be proceeded under the rules framed from time to time by the Government.
3. Charge report should be submitted to all concerned.
4. The appointees should join the post within 15 days of issuance of this order in case of failure order of the concerned shall stand cancelled/withdrawn automatically and disciplinary action will be taken against the defaulter.
5. No TA/DA is allowed for joining their duties.
6. They will be required to furnish copies of all relevant documents/Degrees their of pertaining to the verification fee of the concerned examine body, Board/Universities to the DDO concerned.
7. The DDO concerned is responsible for preparation/updating of their Service Books.

Endst: No. 1027-1070

sd
District Education Officer (M)

Haripur

Dated Haripur the 06/04/2017

Copy for information to the:-

1. Director-E&SED Khyber Pakhtunkhwa Peshawar w/r to his No. Quoted above, please.
2. Senior District Accounts Officer Haripur.
3. Sub Divisional Education Officer (M) Haripur.
4. Principal/Head Mastér concerned Schools.
5. Office record file.

Muhammad Aslam
Dy: District Education Officer
Haripur

Office of the District Education Officer (Male)

(15)

HANNA/UKR
(15/12)

HANPUR

Email: id-deomaledrp@yahoo.com
PH. No. 0995-610178, 610268
Fax No. 0995-610178

Appendix
B

File No. DCB/15/12/25531

Dated 15/12/2018

OFFICE ORDER

The following teaching staff of elementary and secondary education departments hereby transfer against vacant post on their own pay and grade in the interest of public service with effect from the date of taking over charge.

S. No.	Name of the Staff	From	To	Remarks
1	Ad Khan	GHS Kholan Bala	GHS Baidan	Against Vacant Post Due to Shortage of staff and Academic session is to be end.
2	Khalid Manzoor	GHS Kupri	GHS Kholan Bala	Against Vacant Post

Note: No. DCB/15/12/25531

Charges should be submitted to all concerned.

Sd/-

District Education Officer (Male)
Hanpur

Copy for information to:

- The District Elementary & Secondary Education Officer, Khyber Pakhtunkhwa, Peshawar.
- The Deputy Commissioner, Hanpur.
- The District Officer, Hanpur.
- The Senior District Account Officer, Hanpur.
- The District Monitoring Officer, Hanpur.
- The concerned Master/Principals concerned.
- Office copy.

Asst. District Education Officer (M/O)
Hanpur

Handwritten signature



(16)

OFFICE OF THE DISTRICT EDUCATION OFFICER (M)
HARIPUR



Annexure
CC

Ph. No. 0995-610178
Email: deomatehrp@gmail.com

Notification.

In pursuance of Khyber Pakhtunkhwa Service Tribunal camp Court Abbottabad order dated 17-04-2019, and subsequent order dated 23-05-2019 passed in Service Appeal No. 487/2019 titled Muhammad Arif vs Government etc, and Service Appeal No. 488/2019 titled Muhammad Riaz Khan vs Government etc and consequent upon the approval of competent authority the transfer order issued vide this office dated 15-12-2018 and dated 17-12-2018 are hereby recalled and substituted as below with immediate effect in the best interest of public service.

S.#	Name of Teacher	Present School	Adjusted to	Remarks
01	Muhammad Arif CT	GHS Dartian	GHS Kholian Bala	Vice S.No. 02
02	Muhammad Saqib CT	GHS Kholian Bala	GHS Kailag	Against vacant post
03	Muhammad Riaz Khan CT	GMS Babotari	GHS Kholian Bala	Vice S.No.04
04	Muhammad Naeem CT	GHS Kholian Bala	GHS Mang	Against vacant post

Note:

1. Necessary entry to this effect should be made in their service books accordingly.
2. Charge report should be submitted to all concerned.
3. No. TA/DA is allowed.

---sd---
District Education Officer (M)
Haripur

Endst: No. 4399-4402 /F.No.3-9/GB/Transfer

Dated: 17 /06/2019

Copy forwarded to the:-

1. Registrar Pakhtunkhwa Service Tribunal Peshawar with reference to order mentioned above for information please.
2. Senior District Accounts Officer Haripur.
3. Principal/HM Concerned.
4. Teacher Concerned.
5. Office Copy.

Asstt: District Education Officer (M)
Haripur

(17)

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



Annexure D

Khyber Pakhtunkhwa
Service Tribunal

Registry No. 609

Date: 11/4/2019

Appeal No. 457/2019

Mohammad Arif son of Jan Muhammad resident of Ghebah, Tehsil
& District Haripur.

Appellant

VERSUS

- (1) Govt. of Khyber Pakhtunkhwa through Secretary Education, Peshawar
- (2) Director General, Elementary & Secondary Schools, Khyber Pakhtunkhwa Peshawar
- (3) Director Elementary & Secondary Schools, Khyber Pakhtunkhwa Peshawar
- (4) District Education Officer (Male) Haripur.

Respondents

SERVICE APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT OF 1974 AGAINST THE IMPUGNED TRANSFER ORDER DATED 15.12.2018 PASSED BY THE RESPONDENT NO.4 (DISTRICT EDUCATION OFFICER HARIPUR) WHEREBY THE APPELLANT HAD NOT FULFILLED HIS TENURE AT GHS KHOLIAN BALA.

Filed to-day
Registrar
11/4/19

PRAYER:- *On acceptance of the instant appeal, the impugned order dated 15.12.2018 passed by the respondent No.4 may please be set aside and appellants may graciously be transferred back at GHS Kholian Bala which is nearest station of his residence or any other like that.*

ATTESTED

REGISTRAR
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

23.05.2019

Counsel for the appellant and Mr. Said Badshah, ADO alongwith Mr. Muhammad Bilal, Deputy District Attorney for the respondents present. Representative of the department submitted reply to the application filed by the appellant for suspension of impugned order dated 15.12.2018. Copy of the same is handed over to learned counsel for the appellant. Written reply on main appeal not submitted by the respondents. Representative of the department requested for further adjournment. Adjourned. To come up for written reply/comments on main appeal on 18.06.2019 before S.B at Camp Court Abbottabad. The restraint order shall continue till the date fixed.

M.A.

(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

18.06.2019

Counsel for the appellant Mr. Muhammad Bilal, DDA alongwith Mr. Sardar Wali-Ur-Rehman, Assistant for respondents present.

Representative of the respondents submitted a copy of notification dated 17.06.2019 wherein the appellant has been adjusted to GHS, Kholian Bala which is placed on file.

In light of the above notification, learned counsel for the appellant requested for withdrawal of the instant appeal. In this respect his signature also obtained on the margin of the order sheet. As such the appeal in hand is hereby dismissed as withdrawn. File be consigned to the record room.

*In the light of majority orders dated 17-6-19
Presently appeal became impetious to
these case I withdrew - this instant appeal*

M. R. 18-6-19

Certified to be true copy

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Announced: 18.06.2019

Number of Words 1200

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Date of Completion of Copy 17-9-19

[Signature]

(Ahmad Hassan)
Member
Camp Court A/Abad



OFFICE OF THE DISTRICT EDUCATION OFFICER (M)

HARIPUR

(19)

Ph. No. 0995-920150, 920151, 920152

Email: deomalehrp@yahoo.com



Annexure E

Adjustment Order.

The following adjustment on need basis hereby made on their own pay & grade in the best interest of public service with immediate effect.

S.No	Name of Teacher	From	Adjusted at	Remarks
1	Muhammad Fiaz SST (G)	GHS Khol Nara	GHS Bagh Pur Dheri	Against vacant post on Need Basis.
2	Sami Ullah Shah SST (G)	GHS Kot Jaudan	GHS Bagh Pur Dheri	Against vacant post on Need Basis
3	Arif Khan CT (complete his normal tenure)	GHS Kholian Bala	GHS Bagh Pur Dheri	Against vacant post on need basis
4	Rashid Mehmood CT	GHS Kangra Colony	GHS Bagh Pur Dheri	Against vacant post on need basis
5	Abid Mehmood CT	GHS Najafpur	GHS Bagh Pur Dheri	Against vacant post on need basis

Note: the above adjustment is made due to shortage of staff at GHS Bagh Pur Dheri as only 03 teachers are working and rest of teaching posts are lying vacant.

1. Charge report should be submitted to all concerned.
2. TA/DA is not allowed.

--- sd ---


District Education Officer (Male)

Haripur

Endst.No. 2591-95 / F.No 6-6/EB/ Transfer Dated 21/9/2022

Copy submitted to the:-

1. Senior District Accounts Officer Haripur.
2. Principals/Headmasters concerned.
3. District Monitoring Officer Haripur.
4. EMS Local Office Haripur.
5. Office record file.


District Education Officer (Male)
Haripur.

خدمت خرابہ گزارنے پر ایک سال کی سزا دینا اور اس کے بعد اس کے لئے ایک اور نوکری فراہم کرنے کا بندوبست کرنا۔
 دروازے پر (اپنی آرڈر منسٹری آرڈر 95-92) 22-09-2012

25
 (F) Annexure
 حکومتی نوکری کے سائل جنھیں پیکر (CT) گورنمنٹ ہائی اسکول کھولوں والا تعلیم دہی پور میں ایک
 ڈرائیونگ منجی نہر ایف ڈی ہے کہ بتایا کہ 06-22-09 کو آرڈر 95-92 کے تحت GHS کا منجی پیکر
 تحصیل فانیور تیار کرنا ہے۔ جو کہ سائل کھولوں والا کے لئے دروازے پر ایک اور نوکری فراہم کرنے کا بندوبست
 ہے سائل کو بار بار پٹرائیونگ کے زبانی بتایا گیا ہے کہ تیار کرنے کی تعمیل درج ذیل ہے

- ① 07-11-2016 - GPS - سائل جہڑی سے GPS سرکل (دو دروازے پر ایک اور نوکری فراہم کرنے کا بندوبست کرنا)
- ② 06-04-2017 - GPS سرکل سے GHS کھولوں والا
- ③ 15-12-2018 GHS کھولوں والا سے GHS دارتھان تحصیل (دو دروازے پر ایک اور نوکری فراہم کرنے کا بندوبست کرنا)
- ④ 17-06-2019 GHS کھولوں والا دارتھان سے GHS کھولوں والا
- ⑤ 06-09-2022 GHS کھولوں والا سے GHS منجی پیکر تحصیل (دو دروازے پر ایک اور نوکری فراہم کرنے کا بندوبست کرنا)

درج ذیل خواہشیں اور اصولوں کی عروجاً خلاف ورزی کیوں کی ہے

- ① صورت غیر معمولی خواہش میں یکم ستمبر سے تیار کرنے پر پٹرائیونگ کرنے
- ② آرڈر 03 سرکل منجی پیکر Complete His Normal Tenure درج کر کے بددیانتی ظاہر کی ہے حالانکہ اس سے پہلے کوئی ایسا آرڈر نہیں دیکھا گیا
- ③ کیا وہ کسی سے Tenure مکمل ہونے پر سب سے تیار کر کے ہو گئے ہیں
- ④ کیا تعلیم پھر سے ایسا کوئی پیکر موجود ہے جو کہ پٹرائیونگ کے ذریعہ تعلیم میں سٹیپنڈیو
- ⑤ تعلیم پھر سے ایسا کوئی پیکر موجود ہے جو کہ ایک اسکول میں پٹرائیونگ اور وہیں سے اسٹالڈو ہوئے ہیں
- ⑥ یہ ہے اہم خلاف ورزی صورت پیکر (ای ٹرائیونگ) کے بارے میں ہے جس کی کاپی کھولوں والا کے خلاف ورزی ہوئی

یہاں سے اطمینان ہے کہ مذکورہ بالا ضرائف کی اسٹیٹ میں اپیل منظور کرنے سے متعلق
 آرڈر 95-92 منسوخ کر کے اطمینان فراہم کیا جائے

محمد اقصیٰ

صدر، فانیور

873 CT - GHS کھولوں والا حوالہ
 21-9-22 0300-5523155
 0347-8113012

~~_____~~ 07

21-9-22



OFFICE OF THE DISTRICT EDUCATION OFFICER (M)

HARIPUR

Ph. No. 8995-920150, 920151, 920152
E-mail: deo@haripur@yahoo.com

(21)



Adjustment Order.

In continuation of the order 2992-95/0-0/EB/Transfer dated 06/09/2022 the following partial modification in is hereby made on his own pay & made in the best interest of public service with immediate effect:

S.No	Name of Teacher	From	Adjusted at	Remarks
1	Wali CT	UHS Kanjra Karnal	UHS J.P. Digt	Against vacant post having long tenure on need base
2	Muhammad Arif	UHS Karnal	UHS Karnal	Against vacant post
3	Rashid Mahmood CT	UHS Karnal	UHS Karnal	Against vacant post
4	Yash SST Bk	UHS Karnal	UHS Karnal	Against vacant post as there is no vacancy in UHS

- 1. Charge of the school
- 2. TA DA and house

sd /
District Education Officer (Male)
Haripur

Even to the Date

Copy submitted to the

- 1. Senior District Superintendent
- 2. Principals concerned
- 3. District Memorandum Office
- 4. EMIS Local Office Haripur
- 5. Office record file

District Education Officer (Male)
Haripur

(22)



OFFICE OF THE DISTRICT EDUCATION OFFICER (M)

HARIPUR

Ph. No. 0995-920150, 920151

Email: denmalchrp@gmail.com



Annex
(H)

WITHDRAWAL ORDER

The competent authority (District Education Officer Male Haripur) is pleased to withdraw this office adjustment order in partial modification in order issued even No and Date in connection with partial modification order Endst No 2992-56/EB (M) dated 06/09/2022 at S.No 01 and 04. In respect of Mr. Waris CT GHS Kangra Colony, and Yasir SST Bto GHS Kangra on the acceptance of their appeals, both are directed to work as usual.

--sd--

District Education Officer (M)
Haripur.

No. _____ / No. 443/B

Dated _____ /2022.

Copy Forwarded for information to:

- 1. Director, Education, Haripur
- 2. District Account Officer
- 3. Principal GHS Kangra
- 4. Teachers Committee
- 5. Office record

District Education Officer (M)
Haripur

بزرگوار چٹا بچہ دور غنا سدر طہ صاحبہ کو تندرستی دینی سوال اور جواب

چٹا بچہ عالی

التماس سے کہیں کہہ سائل کو بہت تیز بخار ہے

اور سائل آج پھر ڈاکٹر کے پاس جانے والے ہیں

جسکی وجہ سے سائل اپنے سزاؤں میں ہیں

اذا لہذا سے ڈاکٹر سے

اسد کے سائل آپ سے التماس کرتا ہے

کہ سائل کو آج رخصت الفاقہ عذرا ہے

ضروری ہے کہ اس موقع عطا ہو سکے

سائل آپ کا احسان سے عذر دے گا

شکر ہے

محمد عارف خان

سائل

مدنی

شہر نواز السی لہی ۵/۷

۲۰/۱/۲۳

بجز وقت، جزا کے لئے پڑھنا اور پڑھنا، اور نیز پڑھنا۔ پڑھنا اور پڑھنا

جواب دے گا

اللہ تعالیٰ سے دعا ہے کہ سوائے خیر اور نیک اعمال کے
سوائے اس کے کہ قرآن میں مذکور ہے اور اس سے پھر
اس کے سوائے اللہ تعالیٰ سے دعا ہے کہ سوائے خیر اور نیک
دروازہ رفتہ کی خصوصیت، انفاؤں اور عین فرحانی جائے
شکر ہے

محمد عارف خان

سائل

سید علی محمد
10/11/23

محمد خواجہ
السید علی

23/11/23

(25)

میں سے - قدرتی طور پر گوارا کی گئی ہے
Allowed to leave

19/23

گوارا میں کم سے کم 30% گوارا کی گئی ہے
ڈیٹا، رینج و ریکارڈ - اگوست
سائن کی کاپی تیار ہے جس کے ساتھ ساتھ
سرکاری دفتروں سے حاصل ہے۔
تعداد اور قیمت اور صفائی کے بارے میں
نوٹس ہوگی

اللہ اعلم
19/11/23

گوارا، قصبہ

آئی
گوارا، قصبہ

(26)

BASIL CLINIC

The Healing Touch

A76R

Dr. Ejaz Masood

MBBS, FCPS

Medical Specialist

Member American Association of Clinical Endocrinologists

Member American College of Physicians

Professional Member American Diabetes Association



BASIL CLINIC

The Healing Touch

19/2021

Prof. Kha

Parade

WS 1-1417

Expire 100

WS 1-1417

Syn Agalvi - 100 - 100

WS 1-1417

Revis 2010

Jan 04

Test 100-80/80

H1

Dr. Ejaz Masood - Diabetes

Agalvi 100

Agalvi 100 - 100

19/2021

19/2021

Dr. Ejaz Masood

MBBS, FCPS
Medical Specialist
Member American Association of Clinical Endocrinologists
Member American College of Physicians
Professional Member American Diabetes Association

1. ان رپورٹ کے مطابق...
2. ڈاکٹر نے...
3. مریض کو...
4. اپنی...
- 5....

