

SA No. 134/2019


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 In view of the above, the appeal in hand is dismissed as withdrawn.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.

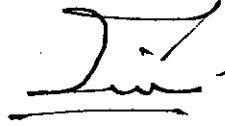
Pronounced in open Court at Camp Court, Abbottabad and given under my hand and the seal of the Tribunal on this 24th day of January, 2023.

SCANNED
KPST
Peshawar


(FAREEHA PAUL)
Member(E)
(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.




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

16.06.2022

None present on behalf of appellant.

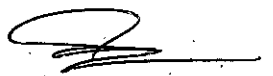
Security and process fee was not deposited. Despite directions notice was not issued to appellant/counsel. Therefore, fresh notice be issued to appellant/counsel to deposit security and process fee within 10 working days of the receipt of notice. Whereafter, notice be issued to respondents for submission 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)


19.8.22, This date is fixed for 24-1-23
for the same,



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

18.01.2022

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

17.03.2021

Nemo for appellant.

Preceding date was adjourned on a Reader's note, therefore, appellant/counsel be put on notice for 14/07/2021 for preliminary hearing, before S.B at Camp Court, Abbottabad.



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

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.

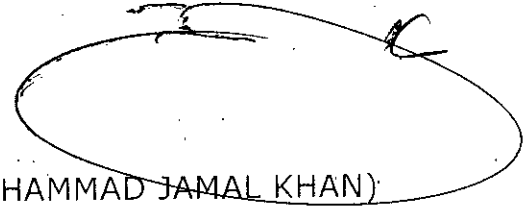
Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel and to come up for preliminary hearing before the S.B on 30.11.2021 at Camp Court Abbottabad.



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

18.09.2020

Appellant Noshewan 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.



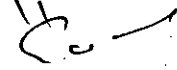
(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT ABBOTTABAD

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

*Or
Readw*

22.11.2019

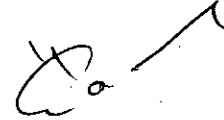
Clerk to counsel for the appellant present and submitted application for adjournment, placed on file of connected service appeal No.67/2019, with the request that next date may be fixed after 15.01.2020. Adjourn. To come up for preliminary hearing on 20.01.2020 before S.B at Camp Court, A/Abad. Last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


Reader

19.06.2019

Counsel for the appellant present.


Learned counsel for the appellant states that through notification dated 25.04.2019 the appellant has been reinstated into service but with immediate effect and the intervening period w.e.f. 31.01.2018 till date of notification was treated as extraordinary leave without pay. In the circumstances learned counsel requests for adjournment of instant matter in order to assist the Tribunal regarding competency of appeal in hand

Adjourned to 09.07.2019 before S.B at camp court, Abbottabad.


Chairman
Camp court, A/Abad


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

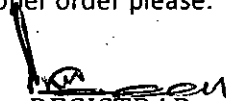


Clerk of counsel for the appellant present and requested for adjournment on the ground that learned counsel for the appellant is not available today. Adjourned to 24.10.2019 for preliminary hearing before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 134 /2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/1/2019	<p>The appeal of Mr. Nowsherwan resubmitted today by Malik 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 29/1/19</p> <p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>19-04-19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-	1-2-19	<p>19.04.2019</p> <p>Nemo for appellant.</p> <p>Notice be issued to appellant/learned counsel for preliminary hearing on 19.06.2019 before S.B at camp court, Abbottabad.</p> <p style="text-align: right;"> Chairman Camp court, A/Abad</p>

The appeal of Mr. Nowsherwan son of Noor-ul-Hassan PST GPS, Malkot District Battagram received today i.e. on 15.01.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures of the appeal may be attested.
- 2- Copy of rejection order of departmental appeal mentioned in para-11 of the memorandum of appeal is not attached with the appeal which may be placed on it.
- 3- Copies of extract from service book mentioned in para-5 of the memo of appeal are not attached with the appeal which may be placed on it.

No. 98 /S.T,

Dt. 15/01/2019.

15/1/19
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Malik Masood-ur-Rehman Adv.
Abbottabad.

*Resubmitted
after doing the needful.*

Malik Masood-ur-Rehman Awan
Advocate Supreme Court
of Pakistan Abbottabad

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

Service Appeal No. 134 /2019

Nosherwan son of Noor-ul-Hassan, PST Govt. Primary School Makot
District Battagram.

....APPELLANT

VERSUS

**SCANNED
KPST
Peshawar**

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

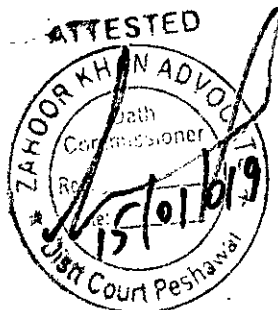
.....APPELLANT

(MALIK MASOOD UR REHMAN AWAN)

Advocate Supreme Court of Pakistan

AFFIDAVIT:-

I, Noshawan son of Noor-ul-Hassan, PST Govt. Primary School Makot 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. _____/2019

Nosherwan son of Noor-ul-Hassan, PST Govt. Primary School Makot District Battagram.

....APPELLANT

VERSUS

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

....RESPONDENTS

SERVICE APPEAL

INDEX

S.#	Description	Page No.	Annexure
1.	Service appeal along with affidavit	1 to 10	
2.	Copy of order	11 to 12	"A"
3.	Copy of order dated 28/07/1997	13 to 24	"B"
4.	Copy of order is appended herewith	25 to 27	"C"
5.	Copy of sack employees Act	28 to 33	"D"
6.	Copies of educational testimonials and service book	34 to 36	"E"
7.	Copy of writ petition alongwith order	37 to 47	"F"
8.	Copy of order	48 to 50	"G"
9.	Copy of judgment/order passed in COC petition referred above	51 to 58	"H"
10.	Copy of attendance register	59 to 66	"I"
11.	Copy of the order is appended herewith with postal receipt	67 to 70	"J" & "K"
12.	Copy of department appeal and order	71 to 73	"L" & "M"
13.	Wakalatnama	74	

...APPELLANT

Dated: 14/01 /2019

Through

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

1

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. 134 /2019

Noshewan son of Noor-ul-Hassan, PST Govt. Primary School Makot
District Battagram.

....**APPELLANT**
Khyber Pakhtunkhwa
Service Tribunal

Diary No. 62

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

15/1/18

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

Re-submitted
to-day 29/1/18

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. 1527-31 dated 14/05/1995. 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. 1039-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 where no decision still made or communicated to the appellant. Copy of department appeal is annexed as Annexure "L".

12. That by now feeling still aggrieved even the of departmental appeal has been preferred 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

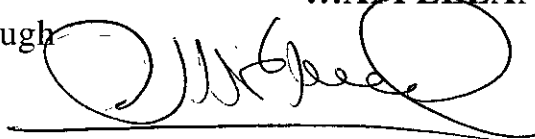
directions to the respondent No.3 but both the directions were dealt so casually, calling immediate reversal by respondent No.1.

- 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: 14/01 2019

Through


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


 ...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.


 ...APPELLANT

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

Service Appeal No. _____/2019

Nosherwan son of Noor-ul-Hassan, PST Govt. Primary School Makot
District Battagram.

....APPELLANT

VERSUS

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

....RESPONDENTS

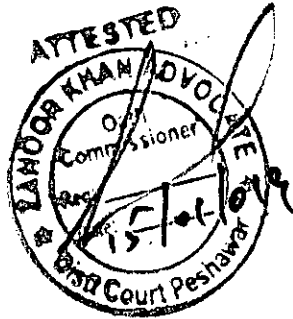
SERVICE APPEAL

AFFIDAVIT

I, Nosherwan son of Noor-ul-Hassan, PST Govt. Primary School Makot
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.



DEPONENT





OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
emisbattagram@gmail.com BATTAGRAM 0997543540

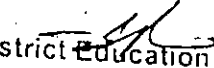
NOTIFICATION:

In the light of Notification No: 9700-5/F.No. Sacked Teachers / Ex-PST (M) Battagram dated 25-04-2019 issued by Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar, the following Ex-Primary School Teachers are hereby reinstated in their service with immediate effect in schools mentioned against each and their intervening period w.e.f 31-01-2018 to date is treated as Extra Ordinary Leave (Leave without pay)

S.NO	NAME	DESIG:	PLACE OF POSTING	REMARKS
1	Bahadar Khan	PST	GPS Bandigo	A/V/P
2	Islam Shah	PST	GPS Mukhtiar Abad	A/V/P
3	Nowsherwan	PST	GPS Sofyan	A/V/P
4	Muhammad Shafiq	PST	GPS Chattoo	A/V/P

Note:

1. Charge report should be submitted to all concerned.
2. Necessary entry should be made in their service book accordingly.

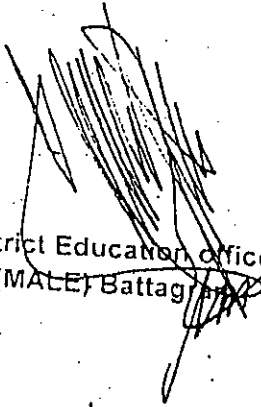

District Education officer
(MALE) Battagram

Dated: 30/04/2019

Endstt: No: 4731-36 / Estb: (P)

Copy to the:

1. Director E&SE Khyber Pakhtunkhwa Peshawar with reference to his office notification no mentioned here above.
2. District Accounts Officer Battagram.
3. District Monitoring Officer (IMU) Battagram.
4. SDEO (Male) Battagram & Allai.
5. Teachers Concerned.
6. Office Copy.


District Education officer
(MALE) Battagram

(12)

A

OFFICE OF THE DISTRICT EDUCATION OFFICER(M) SECONDARY & PRIMARY BATTAGRAM.

GRANT OF E/Leave.

NO. 1527-31

Dated. 14/5/95

Sanction is hereby accorded to the Grant of Earned leave in respect of Mukhtar Mohammad PT GPS Mekhtar Abad w.e.f. 3.5.95 to 27.6.95 (56 days) with full pay & 28.6.95 to 2.9.95 (68 days) with out pay.


The necessary entries may be made in the Services book.

APPOINTMENT IN L/VACANCY.

Mr. Newsherwan s/o Noor ul Hassan R/O Gijberi is hereby appointed against the leave vacancy of Mr. Mukhtar Mohammad PTC GPS Mekhtar Abad who has been proceeded on Long leave w.e.f. above mentioned period. Rs. 1480/- PM fixed in BPS 7 plus usual allowances as admissible under the rules w.e.f from the date of his taking over charge in the interest of public services.

TERMS & CONDITIONS.

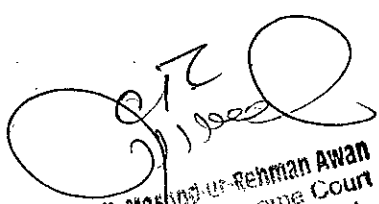
1. Charge report should be submitted to all concerned.
2. The appointment made is purely temporary basis & liable to termination on the arrival of original servant.
3. He is required to produce Health & Age Certificate from the Medical Supdt; Concerned before the drawal of pay etc
4. The age of candidate should not be exceed than thirtythree years are less 18 years.

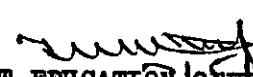

(FAZAL MEHMOOD KHAN)
DISTRICT EDUCATION OFFICER,
M&F (PRY & SECOND) BATTAGRAM.

ENDST: NO. 1527-31 /EB/70/Adjustment/PTC Dated. 13/5/95
Copy of the above is forwarded to the:

1. P.S to the Honable Minister of Primary Education NWFP Peshawar.
2. Sub-Divisional Education officer(M) Battagram.
3. District Account officer Battagram.
4. Head Teacher GPS Mekhtar Abad.

Amir,


Malik Masood ur Rehman Awan
Advocate Supreme Court
of Pakistan Abbottabad


DISTRICT EDUCATION OFFICER,
(M&F) PRY & SECOND BATTAGRAM.

14

B

OFFICE OF THE DISTRICT EDUCATION OFFICER (D) PESHAWAR

OFFICE ORDER

OFFICE ORDER NO. 33/DP/SEA/HY/ABDUR
DATED 23/7/1997

In the light of findings of the enquiry conducted and in compliance with Memo No. F.No. 33/DP/SEA/HY/ABDUR 23.7.97.

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	Nearest	Name of School
1.	Indadullah	Ma Nudat Khan	P.T	OPD Sherrifat.
2.	Shaukat Wahab	Abdul Wahab	"	Jijbori.
3.	Alam Zaib	Zur Gul Khan	"	"
4.	Fazal Wahab	Abdul Wahab	"	Sharif Abad.
5.	Shah Ahmar	Rustam Khan	"	Sun Haddi.
6.	Asir Zaid	Abdul Qadoos	"	Shawal B. roy.
7.	Baz Muhammad	Hazrat Hussain	"	Paway, Funtt.
8.	Muhammad Sultan	Qazi	"	Hadirabad.
9.	Qudrat Ali Shah	Shawab Shah	"	Banwali
10.	Muhammad Eherin	Hijab Khan	"	Oldari.
11.	Fazeez Khan	Multan Khan	"	Tikar Banda
12.	Muhammad Shafiq	Muhammad Khan	"	Kuthal.
13.	Ibrahim Khan	Qul Nayas	"	Gar Haroon.
14.	Alam Zaib	Muhammad Khan	"	Ajaza.
15.	Muhammad	Noorul Hassan	"	Qibbori.
16.	Yakub Rahman	Bukhter	"	Kuchtarabad.
17.	Shaukat Wahab	Muhammad	"	Gangwal
18.	Anwar Faraz	Bumandar Khan	"	Gangoo.
19.	Anwar Zamin	Abdus Bhattar	"	Docpatti.
20.	Gul Fea	Shah Jehan	"	Gurabi, Subroy.
21.	Ibadur Rahman	Miqah Shah	"	Ushinow.
22.	Abdul Basir	Satidullah	"	Rashidabad.
23.	Anwar Zaib	Khaza, Farhad Khan	"	Sooril.
24.	Muhammad	Muhammad Ullah	"	Harguy.
25.	Abdul Chaffar	Muhammad Khan	"	Kurap.
26.	Muhammad Usaf	Mohant	"	Bumari.
27.	Abdullah	Muhammad	"	Koyar.
28.	Muhammad Ibrahim	Muhammad Ja	"	Shahkhey.
29.	Gul Ahasa	Muhammad Khan	"	Garhi N. Said.
30.	Muhammad	Muhammad	"	Har Sakargah.
31.	Muhammad	Muhammad	"	Lalmai.
32.	Muhammad	Muhammad	"	Qul Dattogra
33.	Muhammad	Muhammad	"	H/ Bulkol.
34.	Muhammad	Muhammad	"	Aobor, Kaley.
35.	Muhammad	Muhammad	"	Okoy.
36.	Muhammad	Muhammad	"	Palani.
37.	Muhammad	Muhammad	"	Chayal, Koyar.
38.	Muhammad	Muhammad	"	do.
39.	Muhammad	Muhammad	"	Gangwal, Banda.
40.	Muhammad	Muhammad	"	NEP, Jarbals.
41.	Muhammad	Muhammad	"	Digbier.
42.	Muhammad	Muhammad	"	Dhobai, Jor-
43.	Muhammad	Muhammad	"	hira.
44.	Muhammad	Muhammad	"	Ushinow.
45.	Muhammad	Muhammad	"	OPD Gauri, Harguy.
46.	Muhammad	Muhammad	"	NEP, Kober, Lalmai.
47.	Muhammad	Muhammad	"	Kober, Harguy.
48.	Muhammad	Muhammad	"	Harad, Koyar.
49.	Muhammad	Muhammad	"	I. U. K. S. B.

CTO
Maula Masood-ur-Rehman
Advocate Supreme Court
of Pakistan, Abbottabad

Asst Dist Officer (D) Peshawar

Dist Officer (D) Peshawar

15

25

PAGE NO. 2.

51.	✓ Daraj Khan	Halsat Khan	MSQ	Dorah H. Jan.
52.	Said Ali Shuh?	Said Main	"	Bar Kan Jazang
53.	✓ Malik Muhammad	Jamal Khan	"	Gulrehan.
54.	Shohur Rehman?	Azar Dazht	"	H. K.G.S. Hassan.
55.	✓ Inyat ur Rehman?	Ali ur Rehman	GPS	D. Azimullah.
56.	Mir Daud Khan?	Makim Khan	"	Mahid Sada.
57.	✓ Mumin Khan	Huzrat Bahal	"	H. Patey.
58.	Chulam. Koroq?	Ajum Khan	"	H. Patey.
59.	✓ Habibullah Shah	Mahir Shah	MSQ	H. Patey.
60.	Iteqat Ali?	Ibrahim	"	H. Jan Muhammad
61.	✓ Miraj Khan	Mian Khan	"	Bava Dhoonga.
62.	Fazl ur Rehman?	Abdul Hamid	MSQ	Dhori. Jura Kan.
63.	✓ K. David H. Iqbal	Aurangzaid	"	Hajragra
64.	✓ Nazir Muhammad	Furhad	GPS	Fulshaus.
65.	✓ Jihanul Ha.	Abdul Anon	"	Hanifabad.
66.	✓ M. Hoz	Ghulam Hussain	MSQ	Kasui. H.M.L.
67.	✓ Aurangzaid Khan	Mindra Khan	GPS	Kathora.
68.	✓ S. Zuhrob Shah	Margan Said	"	Barwai.
69.	✓ Munir Khan?	Gul. Hamroz	"	Dawgar.
70.	✓ Rustom Khan?	Miqra Khan	"	Jabotiruz
71.	H. Shoriqua?	Aqilullah	"	Mashkanai.
72.	✓ Dadoz Khan?	Ali Gohar Khan	MSQ	Kiargali U. Khan.
73.	✓ Fida Muhammad?	Fazl ur Rehman	GPS	Cidri. Trand.
74.	✓ M. Khalid?	Gulstan Noora	"	X D. Azimullah.
75.	✓ Ibrahim?	Midnyatullah	"	Damagat.
76.	✓ M. Dilil?	Ikhtiar Malook	"	Hanifabad.
77.	✓ Ahmad Khan?	Gul M. Khan.	"	Cidri. Trand.
78.	✓ Amal Jan?	Saitul Haq	"	Jaba Teroz.
79.	✓ Vatehul. ah?	M. Faridoo	"	Mundri.
80.	✓ Zabal Khan?	Abas Khan.	"	Dodpatti.
81.	✓ Ghulam Rehmani?	Fazl ur Rehman	"	Taria Hill.
82.	✓ Dadiuz Zaman?	Toli. Muhammad	"	Chinow.
83.	✓ B. Waliab. Shah	H. Said	"	Fulshous.
84.	✓ Abdul Ali?	Abdul Malik	"	Bagh. Baida.
85.	✓ Mistin?	Abdul Latif	"	Chinow.
86.	✓ M. Javid?	Zamanullah	"	Dejergren.
87.	✓ Mahmood Dho?	Said Rahart Shah	"	Pakbanda.
88.	✓ Shuhzuda?	Abdul Mateen	"	Hanifabad.
89.	✓ Shaikat Ayaz?	Mulak Jan.	"	Barwey.
90.	✓ Inamullah?	Bava Khan.	"	Mundri.
91.	✓ Habibullah?	Jumhar Khan.	"	Dejergren.
92.	✓ Aurangzaid?	H. Minkoon	"	Taria Hill.
93.	✓ Bakht Morin?	Hudhuk	"	G/Hawab Said.
94.	✓ Ali Awar Khan?	Mian Khan	"	Murzala.
95.	✓ M. Iqbal	Gul Muhammad	"	Trand.
96.	✓ Rustom Khan	Talas Khan	"	Chappergram.
97.	✓ M. Shohid	Abdul Razaq.	"	Peshora.
98.	✓ Attuloh	M. Saeed	"	Shalkhay.
99.	✓ Shah Rozen?	Hayat Khan	"	-do-
100.	✓ Ali Rehman	Uara Khan	"	Walargev.
101.	✓ Hussain Abaed?	Sharin Khan	"	Okay.
102.	✓ Rab. Kawoz Khan.	Afraz M. Khan	"	Terbor.
103.	✓ Parhat Khan?	Murad	"	rashidabad.
104.	✓ Inyat ur Rehman	Gujar Khan	"	Shuykat. abed
105.	✓ Hamyatullah?	Shah Zaid Khan	"	S. Khal. Banda
106.	✓ Nazir ul. ulam?	Huzrat Malik	"	Dabona.
107.	✓ Rustom?	Sabir Khan	"	shatoona.
108.	✓ Razrat Talab?	M. Zunir	"	ak Banda.
109.	✓ Wali Muhammad?	Roshan Khan.	"	akur. Khaycon
110.	✓ M. Javid	Mex Ahmad	"	Shoya.
111.	✓ Shamaul dir	Mahjudin	"	J. Biphote.
112.	✓ Nadar Khan	Mir Ahmad. Khan	"	Mont. Kaulow
113.	✓ Attuloh?	Amunulloh	"	Rutur. Abad.
114.	✓ Tala Shah?	Mion Gul Shah	"	Kulilar.
115.	✓ B. Halim Shah?	Mutabar Shah	"	Chunaidun.
116.	✓ Shahidad?	Gul Haz	"	Dejergren.
117.	✓ Soed ur Redmer?	Kuchkol. Khan.	"	M. H. Sed.
118.	✓ Saad Muhammad?	Huzrat Yonfa	"	Chun. Saidar.
119.	✓ Amir Faraz	Abdul Wahob?	"	Shait. Wallunah
120.	✓ Shukat Ali Shah?	M. Abdismah	"	D/Cherzaid.
121.	✓ S/Mukhtiar Ali?	hal. Noor Habi.	"	Andarsal. Ekky

Handwritten signature and initials.

Malik Masood ur Rehman Awan
Advocate Supreme Court
of Pakistan Abbottabad

Distt Officer (231)
(S&L) Dargara

Distt Officer (231)
(S&L) Dargara

16

PAG. 63....3....

114. Faiz ul Bari	M. Husein	P. 1	Hanif Abad.
115. Faleh Muhammad	Pida Muhammad	"	Old Hanjo.
116. Bakhtawar		"	S. W. Khan, G. C.
117. M. Lalia	Madani Gul	"	Khalid Wajid Shah
118. Altaf Khan Shaid	M. Roshan	"	Oban Saidan.
119. Abdul Ghani Khan	Munzwar Shah	"	CP. B/Ohazri Said.
120. Jauhi Khan	Poyce Khan	"	E. H. Akad.
121. M. Furhad Khan	M. Zahir Shah	"	A. J. Arwani, Tanya.
122. Waheed Khan	Said Ali Khan	"	Daboch.
123. Hojaul Haq?	Abdul Qayyum	"	Kaishal.
124. Said Akbar?	Jan Alam	"	Saprona.
125. Mizbulah	Astus Khan	"	do.
126. Attaulah	Aftab	"	do.
127. Mehtoozullah	Vali Walullah	"	Klusal.
128. Ejaz Akbar?	M. Zahir Shah	"	Harwaris.
129. Sherin Zada	Ghulam Haider	"	Bar-Murin.
130. Waahid Muhammad	Fazal Hoji	"	Munhan, Muddi Yar.
131. Khurshid Khan	M. Ibrahim	"	do.
132. Niaz Muhammad?	Muhammad Aza Khan	"	Mirkundi.
133. M. Iqbal	Aurangzib	"	Murzala.
134. S. Mohiullah	M. Ali Shah	"	do.
135. Abu H. H. Ullah?	Hoda Khalil	"	Ajlo, Ranginabad.
136. Yemal	M. Hussain	"	Fueli Akad.
137. Gulzarul Wahab?	Abdul Wahab	"	Shaukat Akad.
138. Jihen Zaid?	Shah Zada	"	Kuchal.
139. M. Rashid?	Azimullah	"	Madrwali.
140. M. Mumtaz?	Said Ali	"	Hanjo.
141. M. Shorin	Nehmat Ullah	"	Oban Saidan.
142. M. Khurshid	M. Ayub	"	Mil.
143. M. Yousif?	Ghulna Nabi	"	Dabaona.
144. M. Tariq	Pir Muhammad Khan	"	Rajaryan.
145. Khan Moha pad?	Potamza, Khaq	"	Sani Khali Bande.
146. Waaziz	Abdul Haq	"	Maddul Hasan Akad.
147. Baz Muhammad?	Amnallah	"	Oban Saidan, Meran
148. Abdul Haq	She. ar Khan	"	M. Ghoray Karin.
149. M. Shabir Hussain	Habib Said	"	Khalid Aladdin.
150. Amir Muhammad	Jan Muhammad	"	Tabbi.
151. Farvaiz Khan?	Saif-ullah Khan	"	Haz Wal.
152. Inayat ur?	Shaman H. Muddhaz	"	Gundor.
153. M. H. H. H. H. H.	M. Noor	"	Danda Mattangi.
154. Abdul Haq?	Aziz Khan	"	Kandloo.
155. Ghulam Yousef	M. Khaw Wali	"	Magiro
156. Adnan Khan	M. Israel	"	Heen Derra.
157. M. Rehman	Abdullah Jan	"	Kor.
158. Gul Khan	Jucha Khan	"	Mano Pachto.
159. Zulfiger Ali	Hedyot-ul ah	"	Muskani.
160. Gul Bor?	Gul Akher	"	Musul Seri.
161. Eia ur Rehman?	Fazl ur Rehman	"	Ashurban.
162. Jamil ur Rehman	Shah Muhammad	"	Boyerer Ali.
163. Pida Muhammad	Balta Muhammad	"	Karbozi.
164. Akhter Ali	Tora Daz	"	Ginjbhil.
165. Aga Zahir Khan	Obargon Gul	"	Dateelu.
166. S. Akbar Khan?	M. Mohib Khan	"	Daku.
167. M. Poyuz?	Aurangzib	"	Deonga.
168. Bidor Bokht?	Poyce Khan	"	Magiro.
169. Attallah	Falut Khan	"	M. Ghani Kaddor.
170. Tajud din	Abdul Karim	"	Jabba Bahatur.
171. Ghulam Haider	Shah Fir Ali Shah	"	Batley.
172. M. Hoor Said	Almed Khan	"	Ashurban.
173. S. Hamidullah	Usidulak	"	M. Karin.
174. M. Kayser	Gyl Fazil	"	Mala Datchee.
175. Hamid; ah	Hoji Faiz Wahid	"	M. Ghani Kaddor.
176. Amir Muhammad	Shauqur Rehman	"	M. Ghani Kaddor.
177. M. Sharif	Hir Daz	"	M. Ghani Kaddor.
178. M. H. H. H. H.	Muatter Khan	"	M. Ghani Kaddor.
179. Said Ali Shah	Umer Said	"	M. Ghani Kaddor.
180. M. Arsanad	Jumroz Khan	"	M. Ghani Kaddor.
181. M. H. H. H. H.	Aurangzib Khan	"	M. Ghani Kaddor.
182. M. H. H. H. H.	Abdul Rashid	"	M. Ghani Kaddor.
183. M. H. H. H. H.	Mehrujan Kabi	"	M. Ghani Kaddor.
184. M. H. H. H. H.	Faj H. Khan	"	M. Ghani Kaddor.

CFC

Malik Wasim ul Rehman Khan
Advocate Supreme Court
of Pakistan Abbottabad

Dist. Dir. Office (3/1/1980) Dist. Dir. Office (3/1/1980) Dist. Dir. Office (3/1/1980)

17

PAGE 63.....3.....

119. ✓ Faiz ul Bari	M. Masood	P. T	Hassid Akbar
120. ✓ Talib Muhammad	Pida Muhammad	"	G. H. Hossain
121. ✓ M. Zahid	Mudabbir G. I	"	S. D. Khan G. C.
122. ✓ Iftakhar Ahmad	M. Roshan	"	Khalid Gulicich
123. ✓ Abdul Ghani Shah	Munawwar Shah	"	Obaid Saidan
124. ✓ Anwar Khan	Poyce Khan	"	G. P. B. Othman Said
125. ✓ M. Farhad Shah	M. Zahir Shah	"	L. H. Akbar
126. ✓ Waheed Khan	Said Ali Khan	"	A. Darwazi Tatyra
127. ✓ Najmul Haq?	Abdul Qoyyus	"	Daboch
128. ✓ Saif Alam?	Jan Alam	"	Kaishul
129. ✓ H. Zibullich	Astana Khan	"	Saprona
130. ✓ Attaulan	Aftab	"	-do-
131. ✓ Mehtoozullin	Wali Walullah	"	Klusal
132. ✓ Ejaz Ahmad	M. Zahir Shah	"	Burwaria
133. ✓ Sherin Zada	Ghulam Haider	"	Dar Huriin
134. ✓ Anwar Muhammad	Fazal Haq	"	K. H. Hossain
135. ✓ Khurshid Khan	M. Ibrahim	"	-do-
136. ✓ Mir Muhammad?	Muhammad Anwar Khan	"	M. Kundi
137. ✓ M. Iqbal	Aurangzeb	"	Muzala
138. ✓ S. Habiullah	M. Ali Shah	"	-do-
139. ✓ Muhtarullah?	H. G. Khalil	"	J. L. Ranginabad
140. ✓ Email	M. Hussain	"	M. U. Akbar
141. ✓ Golzarul Wahab?	Abdul Wahab	"	Shaukat Akbar
142. ✓ Jahan Zaid?	Shah Zada	"	Kuchal
143. ✓ M. Bashir?	Azimullah	"	Muhammadali
144. ✓ M. Mumtaz?	Said Ali	"	Haji
145. ✓ M. Shurif	Rehman Ullah	"	Obaid Saidan
146. ✓ M. Khurshid	M. Ayub	"	M. I.
147. ✓ M. Yousif?	Ghulna Habi	"	Daboch
148. ✓ M. Tariq	Pir Muhammad Khan	"	Bajurgan
149. ✓ Khan Mulla mad.	Toumaz Khan	"	M. H. H. H. H.
150. ✓ W. Abaziz	Abdul Latif	"	Ladul Hossain Akbar
151. ✓ Boz Muhammad?	Amanullah	"	Obaid Saidan
152. ✓ Abdul Haq	M. H. Khan	"	M. H. H. H. H.
153. ✓ M. Subir Muhammad	Habib Said	"	M. H. H. H. H.
154. ✓ Amir Muhammad	Jun Muhammad	"	M. H. H. H. H.
155. ✓ Feroz Khan?	Saif-ullah Khan	"	M. H. H. H. H.
156. ✓ Inayat ur Rahman	M. Hossain	"	M. H. H. H. H.
157. ✓ M. Hayat?	M. Noor	"	M. H. H. H. H.
158. ✓ Abdul Haq?	Azie Khan	"	M. H. H. H. H.
159. ✓ Ghulam Yousef	M. Khan Wali	"	M. H. H. H. H.
160. ✓ Adnan Khan	M. Ibrahim	"	M. H. H. H. H.
161. ✓ M. Rehman	Abdul Latif Jan	"	M. H. H. H. H.
162. ✓ Gul Khan	Lachar Khan	"	M. H. H. H. H.
163. ✓ Zulfikar Ali	Hayat ul ah	"	M. H. H. H. H.
164. ✓ Gul Haq?	Gul Akbar	"	M. H. H. H. H.
165. ✓ Saif ur Rehman	Fazl ur Rehman	"	M. H. H. H. H.
166. ✓ Jamil ur Rehman	Shah Muhammad	"	M. H. H. H. H.
167. ✓ Pida Muhammad	Bultra Muhammad	"	M. H. H. H. H.
168. ✓ M. Hossain	Tora Baza	"	M. H. H. H. H.
169. ✓ M. Zahir Khan	Obaydullah Gul	"	M. H. H. H. H.
170. ✓ S. Ahmad Khan?	M. Habiullah	"	M. H. H. H. H.
171. ✓ M. Fayaz?	Aurangzeb	"	M. H. H. H. H.
172. ✓ Bider Bukht?	Poyce Khan	"	M. H. H. H. H.
173. ✓ Attullah	Talat Khan	"	M. H. H. H. H.
174. ✓ M. Hossain	Abdul Karim	"	M. H. H. H. H.
175. ✓ Ghulam Haider	Shah Iir Ali Shah	"	M. H. H. H. H.
176. ✓ M. Hossain	Almed Khan	"	M. H. H. H. H.
177. ✓ M. Hossain	Saidul Latif	"	M. H. H. H. H.
178. ✓ M. Hossain	Gul Hossain	"	M. H. H. H. H.
179. ✓ M. Hossain	M. Hossain	"	M. H. H. H. H.
180. ✓ Amir Muhammad	M. Hossain	"	M. H. H. H. H.
181. ✓ M. Hossain	M. Hossain	"	M. H. H. H. H.
182. ✓ M. Hossain	M. Hossain	"	M. H. H. H. H.
183. ✓ M. Hossain	M. Hossain	"	M. H. H. H. H.
184. ✓ M. Hossain	M. Hossain	"	M. H. H. H. H.
185. ✓ M. Hossain	M. Hossain	"	M. H. H. H. H.
186. ✓ M. Hossain	M. Hossain	"	M. H. H. H. H.
187. ✓ M. Hossain	M. Hossain	"	M. H. H. H. H.

Malik Masood ur Rehman Awan
Advocate Supreme Court
of Pakistan Abbottabad

Dist. Dir. Officer (Sally)
(2025) District

18

PAGE NO.

18

1. M. Avaid Iqbal	Dilawar Khan	P.P.	G.P.	Maryula Sultan.
2. M. Abdul Hafiz	Abdul Hakim	"	"	Jicool.
3. Qazi Shafiqullah	K. Mustafa	"	"	M. Channali.
4. Qazi ur Rehman	Abdur Rehman	"	"	Argaulari.
5. Muzir Ahmad	Bukandar Khan	"	"	Matta Haroon.
6. M. Qaim Khan	Shah Nawaz	"	"	Muzi Vasan.

(MALLA ABUOH HASHEM)
 DISTRICT EDUCATION OFFICER (M.A.E)
 PRIMARY BATTAGRAM

Endutt. No. 244-18 Dated Battagram the 24/5 /1957.

Copy of the above are submitted to:-

- 1). Director Primary Education, W.P. Dargai, Mardan Peshawar.
- 2). F.O. to Secretary of Education, W.P. Dargai, Mardan.
- 3). D.D.O. (M) Battagram with the remarks to inform all the above mentioned teachers on their present and reason. Moreover, to inform the D.O. or O.A. of other Districts if some one has already been transferred.
- 4). District Account Officer, Battagram.

DISTRICT EDUCATION OFFICER
 (M) PRIMARY BATTAGRAM

MAJLIS HAKOMAT-UL-AMMAH AWAN
 Muzafar Hussain
 of Pesutan Abbottabad

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

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



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.

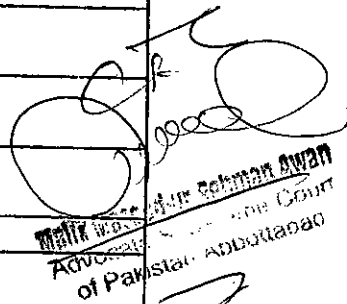
However, they can apply afresh along with others for their selection on merit.

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.	Nosherwan	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	

Malik Masood-ur-Rehman Awan
Advocate Supreme Court
of Pakistan Appottabad


20

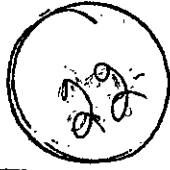
24.	Anwarullah	Muhammad Ullah	P.T	Kuree
25.	Abdul Ghafoor		P.T	
26.	Muhammd Umer	Rehmat	P.T	
27.	Abdullah		P.T	
28.	Muhammad Ibrahim	Muhammad	P.T	
29.	Gul Abbas		P.T	Goli Battagram
30.	Shabir Muhammad		P.T	B/ Balkool
31.	Nadim azam	Aurangzeb	P.T	
32.	Saeed ur Rehman	Aziz ur Rehman	P.T	
33.	Raza Muhammad	Abid Khan	P.T	
34.	Afsar Rasheed		P.T	
35.		Maqbool Khan	P.T	
36.	Anwar		P.T	
37.	M. Shoaib		P.T	
38.	Iftikhar		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


 Malik Wahid ur Rehman Qureshi
 Advocate
 of Pakistan Abbottabad



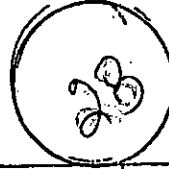
				Khan
61.	Nazir	Farhad	P.T	Bajragrab
62.	Jihanul Haq	Abdul Aman	P.T	Talshaud
63.	M. Riaz		P.T	Hanifabad
64.	Aurangzeb Khan	Mindra Khan	P.T	Kassi Hadi
65.	S. Zuhrah Shah	Fargan Said	P.T	Kathora
66.	Munir Khan	Gul Namroz	P.T	Burwai
67.	Rustam Khan	Bigra Khan	P.T	Dawgar
68.	M. Shafique	Abdullah	P.T	Jabatiruz
69.	Badar Khan	Ali Gohar Khan	P.T	Mashkanai
70.	Fida Muhammad	Fazl ur Rehman	P.T	Kiargali Khan U.
71.	M Khalid	Bultan Room	P.T	Gidri Trund
72.	Ibrarullah	Hidayatullah	P.T	N D. Azumullah
73.	M Balil	Ikhtiar Malook	P.T	Dangat
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


 Malik Masood ur Rehman Awan
 Advocate & Sessions Judge
 of Pakistan Abbottabad



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	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

M. Iqbal
M. Iqbal
Advocate Supreme Court
Pakistan Abbottabad



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 Bartela
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

Malik Masood ur Rehman Awan
Advocate
of Pakistan
Abbottabad



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

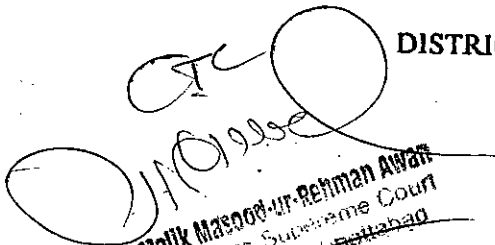
(MALIK ABDUR RASHID)
DISTRICT EDUCATION OFFICER, (MALE)
PRIMARY BATTAGRA

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


Malik Masood-ur-Rehman Awan
Advocate Supreme Court
of Pakistan, Battagram

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BATTAGRAM.
ORDER

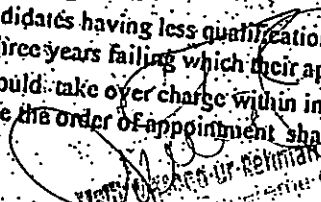
Consequent upon the recommendation of the Departmental Selection Committee and approval of the competent authority (Deputy Commissioner) Battagram, in the light of Khyber Pakhtunkhwa Act XVII 2012 and Honorable Court Judgment Peshawar High Court Abbottabad Bench dated 17-01-2013 the following Sacked employee 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 Kanni	Against V/Post
4	Ghulam Yousaf	Mohd Khan Wali	Shamlai BTM	GPS Hill Bach	Against V/Post
5	Muhammad Hayat	Muhammad Noor	Trand BTM	GPS Kaloota	Against V/Post
6	Mosherrwan	Noor ul Hassan	Gijbori BTM	GPS Malkot	Against V/Post
7	Zeebal Khan	Mubara's Khan	Thakot BTM	GPS Piza Batkool	Against V/Post
8	Dural Khan	Hukmat Khan	Pokal Allai	GPS Mangri	Against V/Post
9	Pervez Khan	Saif ulah	Ajmera BTM	GPS Bern 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 Bateela	Against V/Post
12	Abdul Aziz	Haji Abdullah	Gulibaugh BTM	GPS Battagram	Against V/Post
13	Muhammad Miskeen	Abdul Latif Khan	Takia BTM	GPS Thaya	Against V/Post
14	Muhammad Rizaz	Ghulam Hussain	Banser Shamlai BTM	GPS Koshgram	Against V/Post
15	Khurshud Khan	M. Arshad Khan	Biani Allai	GPS Chapri Karg	Against V/Post
16	Furhad Khan	Murad	Ajmera BTM	GPS Naihoo	Against V/Post
17	Momin Khan	Bial Khan	Kuzabanda BTM	GPS Nchar 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	Begrah Khan	Thakote BTM	GPS Nehray Thakot	Against V/Post
21	Muhammad Shafia	Aliquiah	Dabri Paimal BTM	GPS Tranjar	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 theirs 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.


 M. Anwar-ul-Rehman
 Addl. District Education Officer
 of Pakistan, Battagram

27

- 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 countiniously.
 - (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 TA/DA etc is allowed to any one.

DEPUTY COMMISSIONER
(CHAIRMAN)
BATTAGRAM

Endst:No 7825-31 /EB/AE-II/Appt: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.

Muhammad Iqbal Ahmad
Advocate
of Pakistan

Assistant District Education Officer
Litigation Battagram

29

①

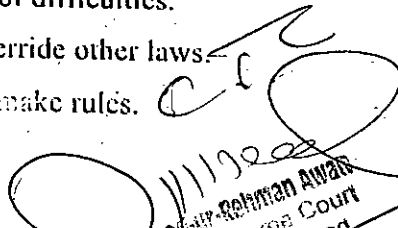
**THE KHYBER PAKHTUNKHWA
SACKED EMPLOYEES (APPOINTMENT) ACT, 2012.
(KHYBER PAKHTUNKHWA ACT NO. XVII OF 2012)**

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.


Malik Mazhar Rehman Awan
Advocate: Supreme Court
of Pakistan Abbottabad

30

**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;

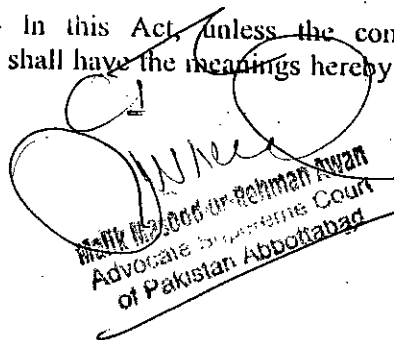
It is hereby enacted as follows:

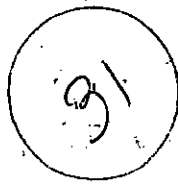
1. Short title, extent and commencement.—(1) This Act may be called the Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012.

(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,-


Malik Asad ur Rehman Anwar
Advocate, Supreme Court
of Pakistan, Abbottabad



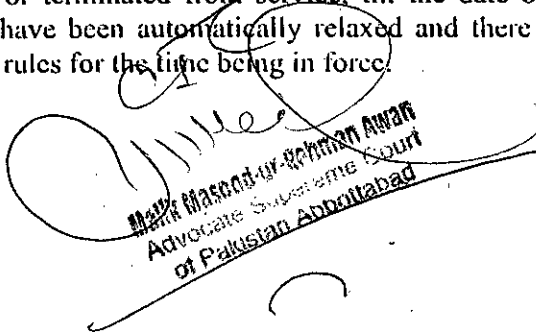
- (a) "civil post" means a post created by the Finance Department of Government for the members of civil service of the Province;
- (b) "Department" means the Department and the Attached Department as defined in the Khyber Pakhtunkhwa Government Rules of Business, 1985, including the Divisional and District 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.

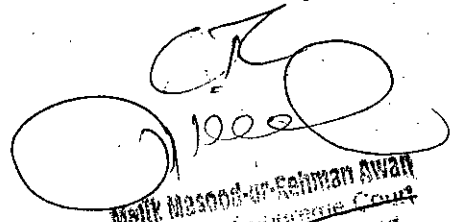
4. **Age relaxation.**— The period during which a sacked employee remained dismissed, removed or terminated from service, till the date of their appointment shall be deemed to have been automatically relaxed and there shall be no further relaxation under any rules for the time being in force.


Mark Masood-ur-Rehman Awan
Advocate Supreme Court
of Pakistan Abbottabad

33

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.


Malik Masood-ur-Rahman Awan
Advocate Supreme Court
of Pakistan Abbottabad



35

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION ABBOTTABAD

HSS 331087142

Khyber Pakhtunkhwa (Pakistan)

Higher Secondary School Certificate Examination

E

PROVISIONAL & DETAILED MARKS CERTIFICATE

Roll No: 31087

Group: HUMANITIES

Part - II

Session: 2014 (Supply)

Name: NOUSHARWAN
Father Name: NOOR UL HASSAN
Reg No: 4138AB/BG-n:FP13
Institution/
District: BATTAGRAM



has secured the marks shown against each subject in the Higher Secondary School Certificate Examination Part-II held in the month of Oct/Nov as a Private Candidate.

Subjects	Marks	Marks Obtained					
		Part-I		Part-II		Total	Marks in Words
		Theory	Pract	Theory	Pract		
English	200	37	—	43	—	80	Eighty Only
Urdu (Comp)	200	33	—	34	—	57	Sixty-Seven
Islamiyat Compulsory	50	18	—	—	—	18	Eighteen
Pakistan Studies	50	—	—	21	—	21	Twenty-One
Arabic	200	58	—	39	—	97	Ninety-Seven
Islamiyat Elective	200	56	—	47	—	103	One Hundred Three
Pashto	200	37	—	55	—	92	Ninety-Two

Total: 1100

Date: 05 December, 2014

Remarks:

478-D Four hundred Seventy-Eight Only

Checked By: _____



Controller of Examinations

Note: Errors / Omissions excepted. Any mistake in Name, Father Name etc must be intimated within 30 days of the issuance date of this certificate to BISE Abbottabad. Visit us: www.bisea.d.edu.pk

36

S

ALLIANCE UNIVERSITY, ISLAMABAD
PROVISIONAL RESULT CARD



Serial No 384443 Roll No. BG619973
 Name NOSHAR WAN Registration No. 15NEM00707
 Father's Name NOOR UL HASSAN Final Semester SPR-2016
 Address VILLAGE AND P/O GIJBORI
 Tehsil BATTAGRAM
 District BATTAGRAM



has successfully completed PRIMARY TEACHING CERTIFICATE

The detail of passed courses is as under

Semester	Course Code	Title of Courses	Marks	
			Maximum	Obtained
SPR- 16	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	90
SPR- 16	0617	TEACHING OF URDU	100	62
SPR- 16	0618	TEACHING OF MATHEMATICS	100	71
SPR- 16	0619	TEACHING OF SCIENCES & PHYSICAL	100	62
SPR- 16	0620	TEACHING OF ISLAMIAT & SOCIAL STUDIES	100	64
AUT- 15	0613	PRINCIPLES OF EDUCATION	100	70
AUT- 15	0614	EDUCATIONAL PSYCHOLOGY	100	64
AUT- 15	0615	SCHOOL ORGANIZATION	100	67
AUT- 15	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	57

Handwritten signature
 Malik Masood ul Rehman Anwar
 Advocate, Supreme Court
 of Pakistan Abbottabad

Credit 5
 Result Declared JANUARY 10, 2017
 Date of Issue JANUARY 20, 2017
 Total Marks/Obtained 900 / 507
 Percentage/Grade 67 / B

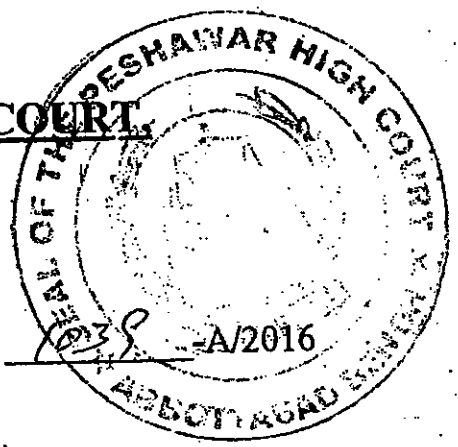
Handwritten signature
 Controller of Examinations

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.

38

F

BEFORE THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH



Writ Petition No. 38 A/2016

Noshervan son of Noor ul Hassan, presently PST, Govt. Primary School Malkot, District Battagram.

...PETITIONER

Certified to be True Copy

[Signature]
EX-Officio
Peshawar High Court
Abbottabad Bench
Authorized Under Sec 75 Acts Ordins

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

[Signature]
Malik Masood-ur-Rehman Awan
Advocate Supreme Court
of Pakistan Abbottabad

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

472
No 3-11-16

Respectfully Sheweth; -

[Signature]
3/11/16

The petitioner humbly submits as under,-



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 True Copy

Examiner

Peshawar High Court

Abbottabad Bench

Authorized Under Sec 75 Act Ord 1999

Muhammad Aslam
Advocate Supreme Court
of Pakistan Abbottabad

FILED TODAY

Additional Registrar
Peshawar High Court
Abbottabad Bench

3/1/14

40

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

Examiner
Peshawar High Court
Abbottabad Bench

Authorized Under Sec. 273 of Cr.P.C.

Malik Masood-ur-Rehman Anwar
Advocate Subordinate Court
of Pakistan Abbottabad

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

Handwritten mark

Handwritten date: 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;

GROUND S:-

- 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.

That the reinstatement of the petitioner is in fact under the law on the existing terms and condjion which was set at the time of his original appointment.

Certified to be True Copy

Chief Justice
 Islamabad High Court
 Abbottabad Bench
 Authorized Under Sec 75 Acts Ordinance

Matk Masood-ur-Rehman Awan
 Advocate Supreme Court
 of Pakistan Abbottabad

3/11/16



- 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 and he is waiting the result of PTC last semester 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

*Malik Masood Anwar
Abbottabad Bench
Authorized Under Sec 75 Act, 1973*

*Malik Masood Anwar
Advocate of the Supreme Court
of Pakistan Abbottabad*

Malik Masood Anwar

143

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 True Copy
Eyewitness
Peshawar Bench
Abbottabad Bench
Authorized Under Sec 23 of the Act
M. A. Khan
Advocate Supreme Court
of Pakistan Abbottabad

FILED TODAY

Additional Registrar
Peshawar Bench
Abbottabad Bench
3/11/26



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.

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

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

Confidential to be kept as copy
3/11/16
Malik Masood-ur-Rehman Aman
Advocate Supreme Court
of Pakistan Abbottabad

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; -

FILED TODAY

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



- 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.

- 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 semester of PTC may also be granted in the interest of justice.

Certified to be True Copy

Exhibits
Peshawar High Court
Abbottabad Bench
Sindh Road, Abbottabad

(Signature)
Wahid Masood-ur-Rehman Awan
Advocate Supreme Court
of Pakistan Abbottabad

37/10/11

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

Through

(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.

نورستیر وان

...PETITIONER

Verified to be True Copy
Exhibitor
Peshawar High Court
13/10/16

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

3/11/16

197

PESHAWAR HIGH COURT, ABBOTTABAD 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.1039-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>sd/ Judge</i></p> <p style="text-align: center;"><i>[Signature]</i></p> <p style="text-align: center;">Malik Masood-ur-Rehman Awan Advocate Supreme Court of Pakistan Abbottabad</p>

[Signature]
 Certified to be true copy
 Examined by
 Peshawar Bench
 Abbottabad Bench
 Authorized Under Section 175-A of the Code of Civil Procedure, 1908

(Ayub)

49

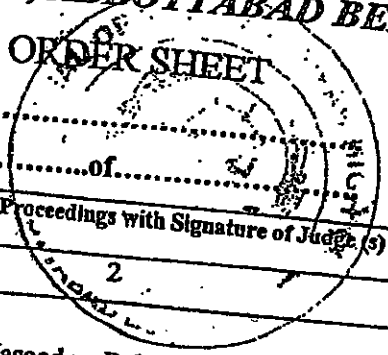
Copy of
order.
14-2-17

G

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	2
14.02.2017	<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: 76 Evid Ordns:

17/02/17

Signature of Malik Masood-ur-Rehman Awan, Advocate, Peshawar High Court, Abbottabad

50

minutes "C" Affidavit

11

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 Evis Ordns:

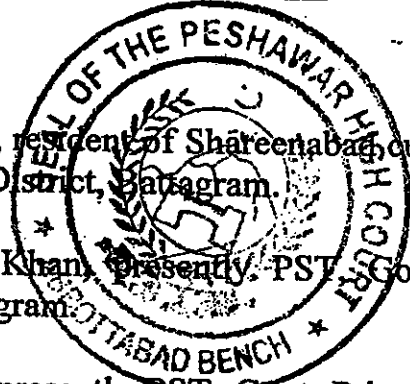
17/02/17

Mulla Masood ur Rehman Anwar
 Advocate Supreme Court
 of Pakistan Abbottabad



BEFORE THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH

COC No. 25 -A/2017



1. Imdadullah Khan son of Musa Khan, resident of Shāreentabaq, 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

VERSUS

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

...RESPONDENT/ CONTEMNOR

Mark Masood
Advocate Supreme Court
of Pakistan Abbottabad

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

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH



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;-

Muhammad Aslam
Advocate Supreme Court
of Pakistan Abbottabad

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

56

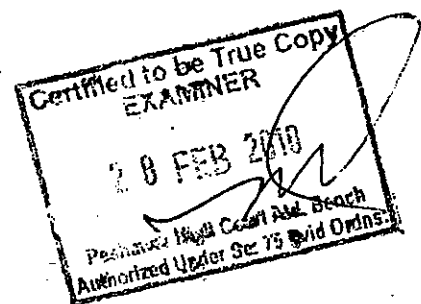
and 1042-A/2016 before this Honourable Court, where this Honourable Court on 14/02/2017 disposed off the all these petitions by way of consolidated judgment/ order passed in writ petition No.859-A/2016 alongwith other connected writ petition. Attested copies of the writ petition No.859-A/2016 and judgment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

CTO
M. Masood-ul-Rehman Awan
 Advocate Supreme Court
 of Pakistan Abbottabad

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
 ARMY ROAD PESHAWAR

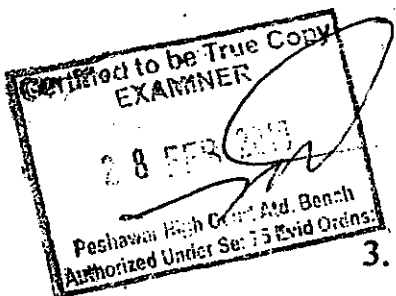
C 131416

95

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".

Malik Masood-ur-Rehman Awan
 Advocate Supreme Court
 of Pakistan Abbottabad



FILED TODAY

ADDITIONAL REGISTRAR
 PESHAWAR HIGH COURT
 ABBOTTABAD BENCH
 2/13/11

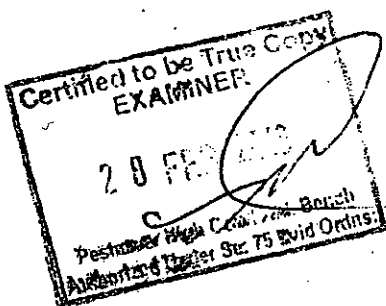
56

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

Handwritten signature
 Mr. Mansoor ul Rehman Awan
 Advocate Supreme Court
 of Pakistan Abbottabad



FILED TODAY

ADDITIONAL REGISTRAR
 PESHAWAR HIGH COURT
 ABBOTTABAD BENCH

2/13/18

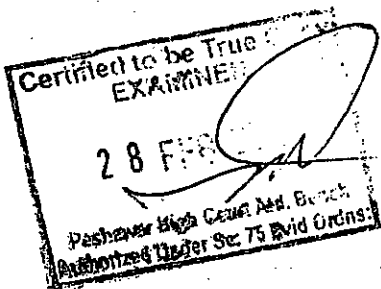
57

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.

Matta Masood-ur-Rehmani Ansari
Advocate Supreme Court
of Pakistan Abbottabad

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.



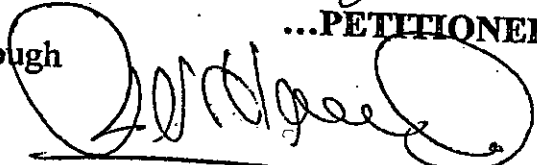
FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT



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

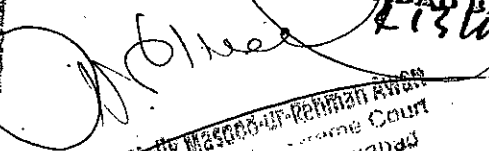
Through  **...PETITIONERS**
(Malik Masood ur Rehman Awan)
Advocate Supreme Court of Pakistan,
Abbottabad

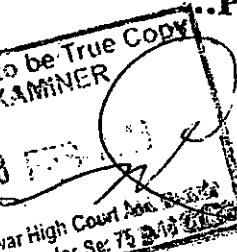
VERIFICATION:

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

**ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH**


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

**Certified to be True Copy
EXAMINER**
2-8

Peshawar High Court
Authorized Under Sec: 75

 **...PETITIONER**

رجسٹر حاضری مدرسین گورنمنٹ ہائی اسکول

ابتداء دسمبر 2015ء

نام	نمبر نمائش	PSHT	مراد خان SPST	نور شریان PST	تعداد نمائش											
عہدہ	نمبر نمائش	FA-PSHT-CT	MA-BECL-SPST	FA-PST	تعداد نمائش											
تاریخ	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	رواگی	دستخط
1	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
2	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
3	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
4	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
5	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
6	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
7	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
8	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
9	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
10	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
11	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
12	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
13	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
14	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
15	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
16	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
17	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
18	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
19	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
20	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
21	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
22	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
23	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
24	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
25	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
26	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
27	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
28	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
29	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
30	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30
31	8/30	C	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30	8/30	1/30

Advocate
of Pakistan
Abbottabad

قسم رخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
اتفاقہ	1	7	8	3	16	19	1	3	4	D	1	1
استحقاق	-	-	-	-	-	-	-	-	-	-	-	-
بیماری	-	-	-	-	-	-	-	-	-	-	-	-
میزان	1	7	8	3	16	19	1	3	4	D	1	1

61 رجسٹر حاضری مدرسین گورنمنٹ پرائمری سکول کراچی

بابت ماہ نومبر 2015ء														
نام	محمد نبی خان PSHT			مراد خان SPST			نور شہزاد PST			قادر خان			عہدہ	
	FA PSHT CT OPI			MA-BED-SPST			FA-PST			فونڈلر				
تاریخ	آمد	دکھائی	دکھائی	آمد	دکھائی	دکھائی	آمد	دکھائی	دکھائی	آمد	دکھائی	دکھائی	رواگی	دکھائی
1														
2	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
3	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
4	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
5	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
6	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
7	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
8														
9														
10	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
11	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
12	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
13	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
14	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
15														
16	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
17	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
18	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
19														
20	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
21	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
22														
23	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
24														
25	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
26	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
27	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
28	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
29														
30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	8/30	1/30	8/30	1/30	8/30
31														

Govt. Primary School
 Kharan
 District
 Government of Sindh
 Karachi

تفریحی (کھیل)
 سابقہ 15
 حال 1
 سابقہ 3
 حال 3
 سابقہ 0
 حال 16

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال
0	0	1	3	3	0	16	15	1	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	1	3	3	0	16	15	1	7	7	0	میزان		

دکھائی میزماٹر

رجسٹر حاضری مدرسین

بابت ماہ اکتوبر 2015ء			
نام	فہرست نمبر	مدرستہ	پست
عبدہ	FA-1547-CT	MA-Baloch	FA-AST

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

Malik Masood-ur-Raza
Advocate Supreme Court of Pakistan
Hobson Road

قسم رخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
انفاقہ	2	5	7	2	13	15	3	3	3	3	3	3
استحقاقی	-	-	-	-	-	-	-	-	-	-	-	-
بیاری	-	-	-	-	-	-	-	-	-	-	-	-
میزان	2	5	7	2	13	15	3	3	3	3	3	3

رجسٹر حاضری مدرسین گوانڈھڑ ہائر سیکولر کالج کراچی

63

2015

بابت ماہ

نام	محمد فیاض - PSHT	مراد خان - PST	نوشیروان - PST	قادر خان
عہدہ	یوتھ سروس - FA-PSHT-CT	MA-BED-PST	FA-PST	یوتھ سروس

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

مہر و ختم	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
اتفاقیت	-	-	13	-	11	8	5	5	-
استحقاق	-	-	-	-	-	-	-	-	-
بیماری	-	-	-	-	-	-	-	-	-
میزان	-	-	13	-	11	8	5	5	-

دستخط ہیڈ ماسٹر

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31

رجسٹر حاضری مدرسین گورنمنٹ پبلک سکول کراچی

2015

یابتہ

نام محمد فیاض
عہدہ T.C.T

نام	محمد فیاض	PSHT	میراد خان	PST
عہدہ	ٹی سی ٹی	FA-PSHT-OT	MA-B-ECT-PST	

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

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

Training
Sun day

Sun day

Sun day

Sun day

WALK INSTEAD OF DRIVING BY CAR
ADVOCATE OF PROPERLY ADDRESSED

مرخصت	حالیہ
اتفاقیہ	
استحقاقی	
بیماری	
میزان	

مرخصت	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان
2	3	5	3	8	11	3	5	8	11	3	5	8

دستخط ہیڈ ماسٹر

رجسٹر حاضری مدرسین

(65)

نام	محمد فیاض PSHT	مراد خان SPST	نور محمدان PST
عہدہ	FA-PSHT-CT	MA-Bed-SPST	FA-PST-

تاریخ	آمد	دستک	روائی	آمد	دستک	روائی	آمد	دستک	روائی	آمد	دستک	روائی
1	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
2	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
3	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
4	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
5	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
6	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
7	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
8	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
9	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
10	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
11	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
12	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
13	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
14	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
15	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
16	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
17	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
18	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
19	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
20	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
21	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
22	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
23	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
24	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
25	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
26	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
27	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
28	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
29	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
30	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓
31	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓	8/30	✓	✓

نمبر رخصت	5	5	5	5	5	5	5	5	5	5	5	5
حالیہ	5	5	5	5	5	5	5	5	5	5	5	5
سابقہ	5	5	5	5	5	5	5	5	5	5	5	5
میزان	5	5	5	5	5	5	5	5	5	5	5	5
حالیہ	5	5	5	5	5	5	5	5	5	5	5	5
سابقہ	5	5	5	5	5	5	5	5	5	5	5	5
میزان	5	5	5	5	5	5	5	5	5	5	5	5

دستک ہیڈ ماسٹر



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DISTRICT BATTAGRAM

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



J

67

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".

- i. Bahadar Khan S/O Ali Gohar Khan Ex PST GPS Mukhtiar Abad
- ii. Muhammad Hayat S/O Muhammad Noor Ex PST GPS Landi Kass
- iii. Noshawan S/O Noorul Hassan Ex PST GPS Malkot
- iv. Zebal Khan S/O Mubaras Khan Ex PST GPS Piza Batkool
- v. Imdadullah Khan S/O Musa Khan Ex PST GPS Barmai
- vi. Shahi Khan S/O Bai Khan Ex PST GPS Peshora
- vii. Muhammad Riaz S/O Ghulam Husain Ex PST GPS Tringar
- viii. Khurshed Khan S/O Muhammad Arshad Khan Ex PST GPS Deshwal
- ix. Islam Shah S/O Mian Gul Shah Ex PST GPS Ranja
- x. Rustam Khan S/O Palas Khan Ex PST GPS Sangu
- xi. Rustam Khan S/O Begrah Khan Ex PST GPS Nerai Thakot
- xii. Muhammad Shafiq S/O Atiqullah Ex PST GPS Chattoo

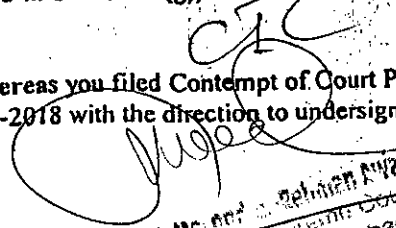
2. And whereas you failed to fulfill terms and conditions of your appointment order i.e could not acquire requisite qualification within stipulated period of three years as per condition No. 7 of your appointment order, resultantly your appointments/services stood terminated automatically.

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.


Malik M. Awan
Advocate
of Pakistan Abbottabad

30/01/2018

SECRET

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

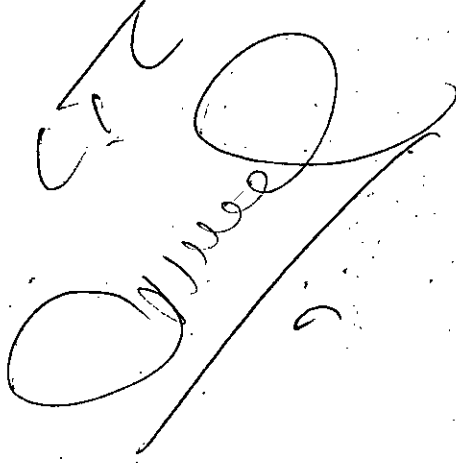
Dated. 31-01-2018

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 & Allal.
6. All the above mentioned Ex PSTs.


District Education Officer (Male)
Battagram



69

No. 553

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

H. Masood

Date Stamp

Initials of Receiving Officer with the word "insured" before it when necessary. Insured for Rs. (in figures) (in words)

If Insured Insurance fee Rs. Ps. (in words) Weight Kilo Grams Name and address of sender

No. 554

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

H. Masood

Date Stamp

Initials of Receiving Officer with the word "insured" before it when necessary. Insured for Rs. (in figures) (in words)

If Insured Insurance fee Rs. Ps. (in words) Weight Kilo Grams Name and address of sender

No. 555

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

H. Masood

Date Stamp

Initials of Receiving Officer with the word "insured" before it when necessary. Insured for Rs. (in figures) (in words)

If Insured Insurance fee Rs. Ps. (in words) Weight Kilo Grams Name and address of sender

No. 556

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

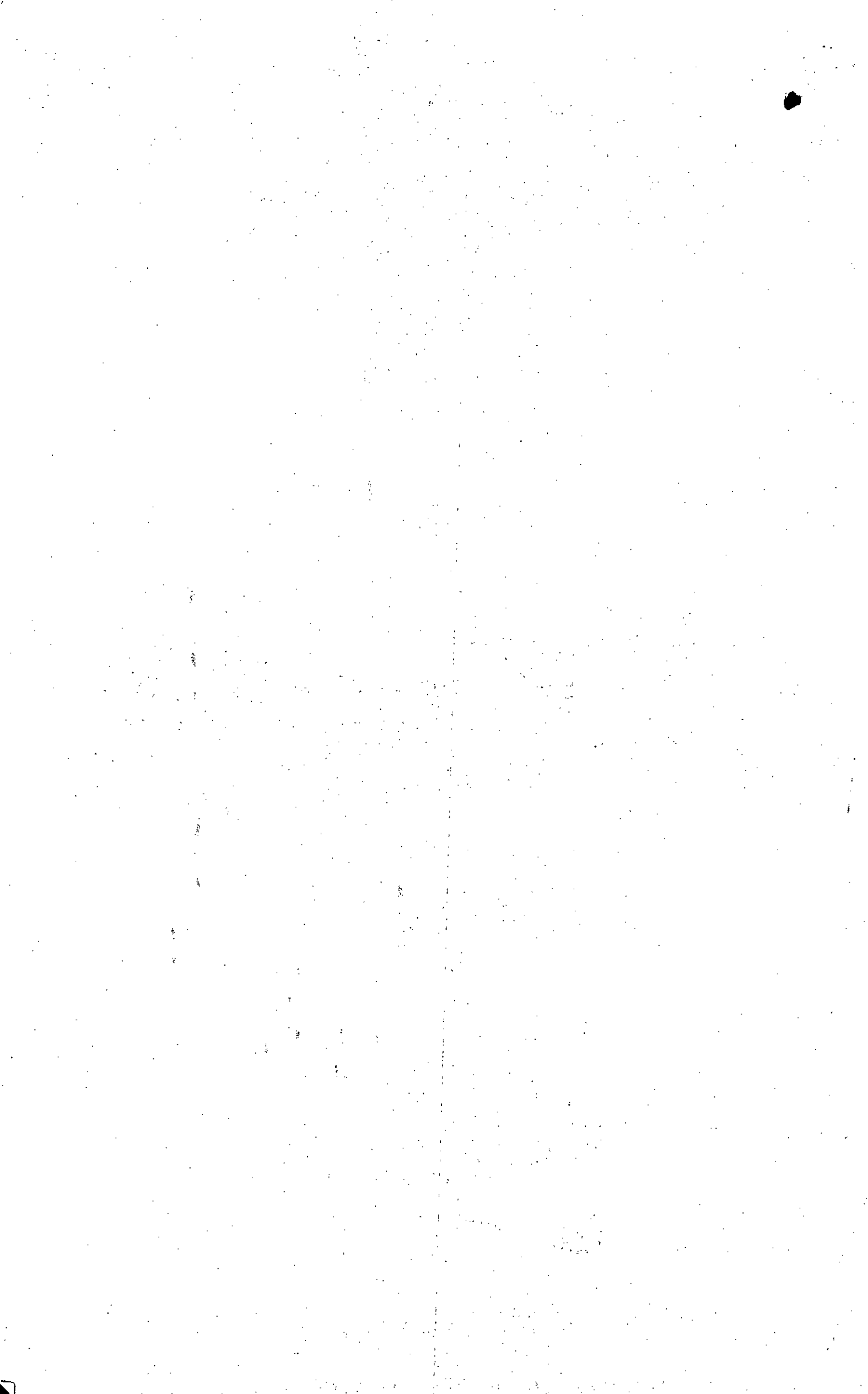
H. Masood

Date Stamp

Initials of Receiving Officer with the word "insured" before it when necessary. Insured for Rs. (in figures) (in words)

If Insured Insurance fee Rs. Ps. (in words) Weight Kilo Grams Name and address of sender

Malik Masood ur Rehman Masood Advocate Supreme Court of Pakistan

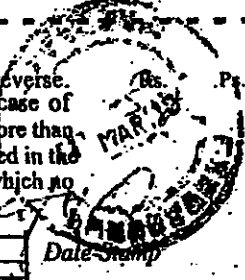


70

N-1-1325

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 _____

Initials of Receiving Officer _____
*Write here "letter", "postcard", "packet" or "parcel"
with the word "insured" before it when necessary.

Insured for Rs. (in figures) _____ (in words) _____

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

Name and address of sender _____

Handwritten signature/initials.

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



بخدمت جناب ڈائریکٹر صاحب محکمہ تعلیم سیکنڈری ایجوکیشن، پشاور

محکمہ اہل

جناب عالی!

سائیلان حسب ذیل عرض رساں ہیں۔

گزارش کی جاتی ہے کہ سائیلان سال 1993 و 1994 میں بھرتی ہوئیں اور تقریباً چار سال بعد سیاسی تبدیلیوں کے باعث 1997 میں سائیلان کو برطرف کیا گیا۔ صوبائی حکومت نے 2012 میں ایک ایکٹ پاس کیا جس کے تحت 2016 میں سائیلان کو دوبارہ سروس پر بحال کر دیا گیا۔ آرڈر ایٹھ ہوتے وقت جناب ڈی۔ای۔ او صاحب نے ایکٹ سے منسلک 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 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 بگرام نے اس کی تصدیق 2016 سے بند کر دی۔ سائیلان ابھی تک اپنی ڈیوٹیاں سرانجام دے رہے ہیں جبکہ جناب ڈی۔ای۔ او صاحب بگرام نے مورخہ 31/01/2018 کو سائیلان کے ٹرمینٹ آرڈر جاری کر دینے۔ سائیلان ایک تادم اور انسانی فریب مانتے 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۔

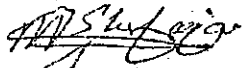
اس لیے اس سورت سے استدعا ہے کہ سائیلان کو چار ماہ کی پی۔ٹی۔سی لٹ پاس کرنے کی رعایت فرمائی جائے اور ہماری تنخواہیں اور سروس بحالی کی اجازت دی جائے سائیلان اور سائیلان کا خاندان تاحیات دعا گو رہیں گے۔

(المرقوم: 16/03/2018)

سائیلان اور خواست گزاران



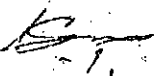
میاں محمد خان پی ٹی سی ایف اے جی پی ایس، مختیار آباد (0306-5640241)



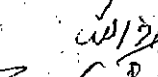
محمد شفیق پی ٹی سی ایف اے جی پی ایس، چنو (0336-1153533)



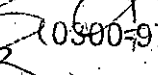
اسلام شاہ پی ٹی سی ایف اے جی پی ایس، رانجھا (0310-5267104)



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



امداد اللہ پی ٹی سی ایف اے جی پی ایس برمانے (0344-9155463)



ماسعود خان DM، ایف اے ای بی ایڈ جی ایم ایس گڑھی نواب سید (0900-9712967)

Muhammad Masood - Advocate
Advocate for the Supreme Court
of Pakistan Abbottabad

تعمیر و صنایع بگرام ہزارہ

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)

BATTAGRAM

753 /EB/Pry Dated

Battagram: 10/05/2018

73

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.

Masoom-ur-Rehman Awan
Advocate Supreme Court
of Pakistan Abbottabad

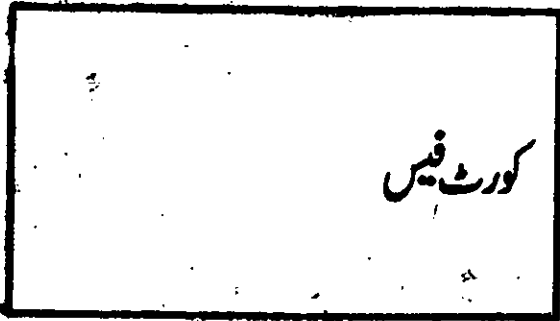
DISTRICT EDUCATION OFFICER
(MALE) BATTAGRAM

20/5/18

74

وکالت نامہ

کورٹ فیس



بعدالت سروس ٹریبیونل KPK لشکر
 عنوان: ٹوٹا سول ہم گورنمنٹ آف KPK وٹھلہ
 منجانب: سائل وکی

نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے جبری و مجاب دہی کل کارروائی متعلقہ آن مقام

صلی اللہ علیہ والہ وسلم اعوان اللہ وولیتہ صریح

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر نٹ و فیصلہ بر طرف دہیے 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 مذکورہ کی کل یا کسی جبری کارروائی 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 روپیے ہی اختیارات ہوں گے اور اس کا ساختہ پر واضح مجھ کو منظور قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہر جانہ الخوائے مقدمہ کے سبب ہوگا اس کے سختی وکیل صاحب ہوں گے۔

نیز ہتھیار تم وصول کرنے کا بھی اختیار ہوگا اگر کوئی جہی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ جبری مقدمہ مذکورہ کریں اور اگر محکمہ مقرر کردہ میں کوئی جہ و ہتھیار ہو تو وکیل صاحب موصوف

مقدمہ کی جبری کے پابند ہوں گے۔ نیز درخواست براد استجارت ناش بیخہ مجلسی کے دائرہ کرنے اور اس کی جبری کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقوم: 14/01/16

Malik Masood-ur-Rehman Awan
Advocate
of Pakistan Abbottabad
بمقام

نوٹیشن سیکلہ

اکھنچو - ادرار صوبہ سروی کسپریشن اوسر ادرار

سروی اوسر ادرار
134/19

صا جی ا

گنر ادرار صوبہ سروی کسپریشن اوسر ادرار

لکڑا ادرار صوبہ سروی کسپریشن اوسر ادرار

صا جی ا

صوبہ سروی کسپریشن

گنر ادرار

13 202 . 076 . 87 . 88 . 1 .

گنر ادرار

صا جی ا

صوبہ سروی کسپریشن
24 / 023 .