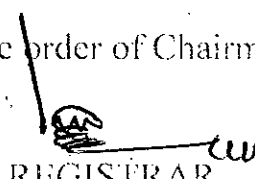


FORM OF ORDER SHEET

Court of

Case No:-

656/2023


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/03/2023	<p>The appeal of Mr. Safdar Ali resubmitted today by registered Post through Abdur Rauf Chohan Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on _____. Notices be issued to the appellant and his counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman</p> <p style="text-align: right;"> REGISTRAR</p>

The appeal of Mr. Safdar Ali son of Ali Akbar Theology Teacher GMS Jandar Bari Distt. A.Abad received today i.e. on 03.03.2023 is incomplete on the following score which is returned to the co Counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures A, C, D and page no. 32 to 35 of the appeal are illegible which may be replaced by legible/better one.
- 2- Memorandum of appeal be got signed by the appellant.
- 3- Certificate be furnished that whether any petition on the subject matter has earlier been filed in this court.

No. 890 /S.T,

DI. 7/3 /2023


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Abdur Rauf Chohan Adv.
High Court at A.Abad .

تمام جملہ اعتراضات ختم کر دیے گئے ہیں
اور اندر معیار اپیل دوبارہ حاضر خدمت ہے
مزد کارروائی کی ہے
صرفیت 8 مارچ 2023 ہے
صفر علی ٹی. ایبٹ آباد
ایبٹ آباد

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL CAMP COURT ABBOTTABAD.**

Service Appeal No. 656 /2023

Safdar Ali

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa and others

...RESPONDENTS

SERVICE APPEAL

INDEX

S.No.	Description of Document	Annexure	Page No.
1.	Service Appeal alongwith Verification and affidavit	--	1-8
3.	Copy of First appointment order dated 21.11.1994	"A"	9-10
4.	Copies of Academic and Professional certificates	"B"	11-15
5.	Copy of Notification No.SO(B&A)/1- 18/E&SE/2012, dated 11/07/2012	"C"	16-17
6.	Copy of Notification dated 20/12/2013	"D"	18-22
7.	Copy of impugned notification dated 01.12.2022 issued by respondent No.2 and adjustment order dated 12.12.2022 issued by respondent No.3	"E"	23-35
8.	Copy of departmental appeal	"F"	36
10.	Vakalat Nama	--	37

...APPELLANT

Through Counsel:

Dated: 21/3 /2023

(ABDUR RAUF CHOHAN)
Advocate High Court, Abbottabad.

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL CAMP COURT ABBOTTABAD.**

Service Appeal No. 656 /2023

Safdar Ali S/o Ali Akbar Theology Teacher GMS Jandar Bari District
Abbottabad, resident of Village and Post Office Malsa Tehsil and District
Abbottabad, Contact No.0316-9197487: Gmail: safdarali.56@gmail.com

...APPELLANT

V E R S U S

- 1) Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department (E & SED) K.P.K Peshawar.
- 2) Director Elementary & Secondary Education (E&SE) K.P.K Peshawar.
- 3) District Education Officer (M) Abbottabad.
- 4) Imdad Ullah SST, GHS Kuthiala District Abbottabad.
- 5) Sohail Zeb SST, GHS Hari Khetar District Abbottabad.

...RESPONDENTS

**APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT 1974 AGAINST IMPUGNED
PROMOTION NOTIFICATION / ORDER NO.3912-16 DATED
01.12.2022 ISSUED BY RESPONDENT NO. 2 IN WHICH THE
APPELLANT WAS ILLEGALLY IGNORED FROM
PROMOTION OF TT POST TO SST (G) POST, BPS-16, THE
SAID ORDER IS TOTALLY AGAINST THE LAW, WITHOUT**

JURISDICTION MALAFIDY AND ISSUED ON BASELESS FACTS AND APPELLANT FILED A DEPARTMENTAL APPEAL BEFORE RESPONDENT NO.1 ON 02.12.2022 WHICH WAS NOT HONORED THE APPELLANT IS FILING THE INSTANT SERVICE APPEAL BEFORE THIS HON'BLE TRIBUNAL WITHIN THE SPECIFIC PERIOD OF 120 DAYS.

PRAYER:-

ON ACCEPTANCE OF THE INSTANT APPEAL, IT IS VERY HUMBLY PRAYED THAT, IMPUGNED PROMOTION NOTIFICATION / ORDER NO.3912-16 DATED 01.12.2022 ISSUED BY RESPONDENT NO. 2 MAY KINDLY BE SET-ASIDE / MODIFIED AND THE APPELLANT MAY KINDLY BE PROMOTED W.E.F. THE DATE AT WHICH THE MOST JUNIOR TEACHERS FROM PROMOTED TT POST TO SST (G) BPS-16 WITH ALL BACK.BANIFIT ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEMS PROPER IN THE CIRCUMSTANCES OF THE CASE BE GRANTED.

Respectfully Sheweth,

1. That, appellant was initially appointed as a "TT" in BPS-07, at GMS Nakar Khan Kalan District Abbottabad on 21.11.1994 vide order Endst: No. 100. (Copy of First

appointment order dated 21.11.1994 is attached as Annexure "A")

2. That, the appellant was promoted from BPS-07 to BPS-09 on 15.10.1995 at the basis of passing Intermediate Exam in 2nd Division in the light of the notification issued by Govt. of KPK.
3. That, the appellant passed his B.A Examination from AIOU, Islamabad in 2nd Division in the year 2002 and appellant got profession degree of B.Ed from AIOU Islamabad in the year 2004. (Copies of Academic and Professional certificates are attached as Annexure "B")
4. That, as the basic scale of the post of TT was upgraded into BPS-15 vide Notification No SO (B&A)/1-18/E&SE/2012, dated 11/07/2012, issued by Respondent No.1 hence, the appellant was also promoted/upgraded from BPS-09 to BPS-15 w.e.f 01/07/2012 in the light of abovementioned notification. (Copy of Notification No.SO(B&A)/1- 18/E&SE/2012, dated 11/07/2012, is attached as Annexure C")
5. That, on 20/12/2013, Respondent No.1, issued a notification according to which 75% teachers (CT/SCT,

DM/SDM, AT/SAT, TT/STT.Qaria/S.Qaria) were to be promoted to SST post and in the said 75/% Promotion Quota, 4% quota was also fixed for the promotion of TT / STT to SST post. (Copy of Notification dated 20/12/2013 is attached as Annexure "D")

6. That, in the light of above mentioned notification dated 20/12/2013, most junior following Respondents / teachers, (TT and STT teachers) were promoted to SST posts vide different notifications issued by respondent No.2, but in the said promotion notifications, the name of appellant was not included for the promotion as SST BPS-16 although appellant fulfill prescribed qualification and promotion criteria for the post of SST BPS-16:

S.#	Name of teacher	Promotion order No.	Date of promotion	Adjustment order date	Order No.	Place of adjustment
1	Qazi Fiaz Ahmed	8946-70	30-06-15	30-07-15	6399-6405	GHS Nathiagali ATD
2	Sohail Mir	1834-40	09-05-16	18-05-16	3991-97	GHSS No.3 ATD
3	Attiq ur Rehman	5070-76	08-08-16	31-08-16	6859-65	GHS Rajoia ATD
4	Abid ur Rehman	6070-74	31-01-17	15-02-17	1570-78	GMS Hatrol ATD
5	M.Mushtaq	1693-99	25-07-17	10-08-17	8788-96	GHS Surjal ATD
6	M.Siddique	5658-63	22-12-17	26-01-18	13566-74	GHS Keri Raiki ATD
7	Abdul Sakoor	8553-58	07-02-20	14-02-20	1262-71	GHS Kuthiala ATD
8	Abid Ali	2652-57	08-12-20	11-12-20	7379-88	GMS Seri Khan Kalan ATD
9	Habib-ur-Rehman	4979-85	29-10-21	05-11-21	8740-49	GHS Nakar Khan Kalan ATD
10	Imdadullah	3912-16	01-12-22	12-12-22	9276-82	Ghs Kuthiala ATD
11	Sohail Zeb	3912-16	01-12-22	12-12-22	9276-82	GHS Hari Khetar ATD

Copy of impugned notification dated 01.12.2022 issued by respondent No.2 and adjustment order dated 12.12.2022 issued by respondent No.3 are annexed as Annexure "E")

7. That, on 02.12.2022, appellant filed departmental appeal before respondent No.1 against the illegal impugned promotions orders issued by respondent No.2 but the same is still pending. (Copy of departmental appeal is attached as Annexure "F")
8. That, the appellant assails the impugned promotion notifications on the following amongst other grounds:

GROUND:-

- a. That, the seniority of any employee is to be considered from the date of first appointment of the employee according to the Rules, Law and Policy.
- b. That, according to the Judgment of August Supreme Court of Pakistan (2004 PLC (CS) 1228) any permanent basis appointed employee, could never become underside from his junior in seniority.
- c. That, the impugned Notifications/orders were issued only at the basis of malafide intention in which law and Rules were not followed.

- d. That, due to the impugned notification/orders, the service career of the appellant is being suffered badly alongwith financial loss.
- e. That, the appellant fulfills all the codal formalities for promotion into SST post because the appellant have a prescribed qualification alongwith seniority cum fitness.
- f. That, there no such kind of order was issued against the appellant under section-4 of the E&D Rules 2011, by the competent or Hire authority due to which the promotion of appellant was liable to be stopped.
- g. That, respondents ignored the appellant from promotion which is not in the jurisdiction of respondents thus, respondents exceeded their power and intentionally ignored the appellant from promotion only to mentally torture the appellant.
- h. That the instant Service appeal is well within time.
- i. That the other points shall be urged at the time of arguments.

PRAYER:

It is, therefore, humbly prayed that on acceptance of the instant Service Appeal, impugned promotion notification / order No.3912-16 dated 01.12.2022 issued by respondent no. 2 may kindly be set-aside / modified and the appellant may kindly be promoted w.e.f. the date at which the most junior teachers from promoted TT post to SST (G) BPS-16 with all back.banifit Any other relief which this Honourable Tribunal deems proper in the circumstances of the case be granted.

...APPELLANT

Through Counsel:

Dated: 21/3 /2023


(ABDUR RAUF CHOCHAN)
Advocate High Court, Abbottabad.

VERIFICATION:-

Verified that the contents of the instant Service Appeal are true and correct to the best of my knowledge and belief and that nothing material has been suppressed from this Honorable Court.

Dated: 21/3 /2023


...APPELLANT

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL CAMP COURT ABBOTTABAD.**

Service Appeal No. /2023

Safdar Ali

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa and others

...RESPONDENTS

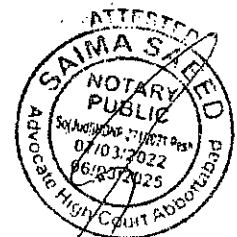
SERVICE APPEAL

AFFIDAVIT

I, Safdar Ali S/o Ali Akbar Theology Teacher GMS Jandar Bari District Abbottabad, resident of Village and Post Office Malsa Tehsil and District Abbottabad, **Appellant**, do hereby solemnly affirm and declare on Oath that the contents of instant **Service Appeal** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.

Dated:- /2023

...APPELLANT



04/01/23

9

ANNEXURE
A

OFFICE OF THE DISTRICT EDUCATION OFFICER SECONDARY (M) ABBOTTABAD.

Office Order No. 100 / AE-IV/TTa

Dated at Abbottabad the 21/11 / 1994

A P P O I N T M E N T

Consequent upon the approval of selection committee and qualifying the prescribed ~~interview~~, the following ~~candidates~~ are ~~being~~ temporarily appointed on merit against the post of theology ~~vacant~~ in BPS No. 7 as. 1480-81-2495/- P.M plus usual allowances as admissible under the rules with effect from the date of taking over charge on the following terms and conditions:-

S.No.	Name of Candidate and address	Name of school where appointed	Remarks
1.	Gazi Ibrahim S/O Q. Mohd Zafidul Hussani Vill: & P.O Salhad Atc;	G.M.S Nowansheera	Against vacant TT post.
2.	Abdul Waseed S/O Abdul Ghani Vill: Bol De Gali P.O Dobather	GMS Chunali	--do--
3.	Muhammad Nisar S/O Mohd Iqbal R/O Banda Noor Ahmed A'Abad	GHS Seer	--do--
4.	Attaur Rehman S/O Abdul Ghafoor Vill: & P.O Salhad-Abbottabad	GMS Malkote	--do--
5.	Naheem Gul S/O Abdul Khaliq Kunjand Jadedd Abbottabad	GHS Pawa	--do--
6.	Abdul Shakoor S/O Muhammad Ayub Vill: Solan Bala P.O Mian Bhan	GHS Nagri Tutial	--do--
7.	Abdur Rehman S/O Fazal Dad Vill/ R/O Abbottabad	GHS Maira-Rehmal	--do--
8.	Khalidur Rehman S/O Abdur Rehman C/O HM GMS Chori-Abbottabad	GMS Pirkote	--do--
9.	Habibur Rehman S/O Mohd Suleman R/O Nagri Bala Abbottabad	GHS Nagri Bala	--do--
10.	Shaukat Sultan S/O Mohd Hussain R/O Sheikhul Bandi-Abbottabad	GMS Khukriala	--do--
11.	Amar Mahmood S/O Mahmood Khan R/O Nawansheer-Abbottabad	GHS Bakote	--do--
12.	Safdar Ali S/O Ali Akbar C/O Mohd Sarfaraz C-IV GMS Machhan De Maira-Abbottabad.	GMS Nakar Khan Kalan	--do--

CONDITIONS:-

1. The appointments are purely on temporarily basis and liable to termination at any time without any notice or assigning reason.

Contd: on page/2.

ATTESTED
[Signature]

[Signature]
Head Master
Govt High School
Malkote Abbottabad

-:2:-

2. They are required to produce Age & Health certificates from the Medical Supdt; DHO Hospital Abbottabad.
3. They are not allowed to take over charge if their Age is less than 18 years and above than 30 years.
4. All original Educational/Character and Service certificates must be checked/verified by the Head of Institution concerned before handing over the charge.
5. If they fail to take over charge of the post within fifteen days from the issue of this order the appointment will automatically be cancelled.
6. In case of resignation they will have to submit one month prior notice to the Department ~~for which~~ one month pay will be fore-feited.
7. Change register should be submitted to all concerned.
8. No TA/DA is allowed on fresh appointment.
9. Special relaxation of upper age limit for two years has also been allowed vide Govt. of Punjab No. SP-311(S-2)A/94 dated 18.7.1994.

OFFICE OF THE DIVISIONAL
 COMMISSIONER
 Abbottabad

(SARDAR MUHAMMAD IZREES)
 DISTRICT EDUCATION OFFICER(S-M)
 ABBOTTABAD.

Encl. No. 17643-73 / 21/11 / 1994

Copy of the above is forwarded to the:-

1. P.S to Honourable Minister for Education N.W.F.P. Peshawar.
2. Divl. Director of Education (Schools) Hazara Division Abbottabad.
- 3-14. All the Headmasters of Government High/Middle Schools District Abbottabad.
- 15-28. All candidates concerned
29. Office Order File.

[Signature]
 DV: DISTRICT EDUCATION OFFICER(S-M)
 ABBOTTABAD.

S.R. ATTESTED

[Signature]
 20/11/94

11

ANNEXURE
B

Allama Iqbal Open University Islamabad



Serial No. 35146

Certified that Mr. / Ms. SAYDAR ALI

Son / Daughter of ALI AKBAR

Registration No: 96-RAD-0699 Roll No: F-4458276

having completed the prescribed requirements in semester
SPRING, 2002

is awarded the degree of:

Bachelor of Arts

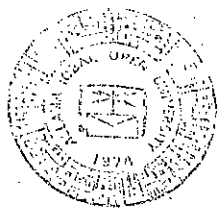
Attested

Secured
1000 marks
3000 High School

ATTESTED

He / She has secured 46 % marks and has been placed in C grade.

Fogiel
CONTROLLER OF EXAMINATIONS



[Signature]
VICE-CHANCELLOR

Result declared on: Mar. 28, 2002

ISLAMABAD. DATED: 15th 10 2001

THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT, ISSUED SEPARATELY

(12)

Serial No: 33518

ALLAMA IQBAL OPEN UNIVERSITY



TRANSCRIPT

SAFDAR ALI

son/daughter of ALI AKBAR

Registration No. 96-WAO-0699

Roll No. F-4468276

has completed all the requirements of

BACHELOR OF ARTS (General Group)

in SPRING, 2001. Semester on 28TH MAR, 2002. The details of courses passed is as under:

Code/ Course	Marks obtained	Grade
416 - Islamic Studies / 418 - Ethics	48	C
417 - Pakistan Studies	45	C
435 - Functional English	45	C
403 - PAKISTAN STUDIES	46	C
407 - MODERN MUSLIM WORLD	42	C
436 - SEERAT-E-TAYYABA	41	C
423 - LIBRARY SERVICES	60	B
404 - URDU	42	C
419 - EDUCATION	46	C

TOTAL :- 415/900

ATTESTED

He/She has secured 46% marks and the cummulative grade is C

Prepared by: _____

Checked by: _____

Head Master
Govt. High School
Phalkote Abbottabad

Controller of Examinations

13

Allama Iqbal Open University Islamabad



Serial No. 81502

Certified that Mr. / Ms. SAFDAR ALI

Son / Daughter of ALI AKBAR

Registration No: 96-NAD-0699 Roll No: L-691711

having completed the prescribed requirements in semester
SPRING 2003 is awarded the degree of:

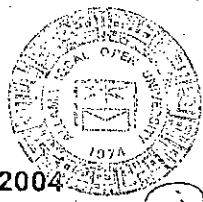
Bachelor of Education (B.Ed)

Attested

He/She has secured 61 % marks and has been placed in B grade.

Attested

CONTROLLER OF EXAMINATIONS



Attested

VICE-CHANCELLOR

Result declared on: February 17, 2004

ISLAMABAD. DATED: January 21, 2006

THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT, ISSUED SEPARATELY

14

Serial No. 103326

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

Roll No.

1691711

DETAILED MARKS SHEET

Registration No.

95NAB0029

It is to certify that Mr./Ms.

SAFDAR ALI

son/daughter of ALI AKBAR has completed all the requirements for **BACHELOR OF EDUCATION** degree Programme with the following courses in SPRING 2003 Semester :-

Compulsory Courses

Marks obtained

512	Perspectives of Education	77	/100
513	School Organization & Management	59	/100
514	Evaluation, Guidance & Research	54	/100
518	Educational Psychology & Curriculum	58	/100
651	English	52	/100
652	Islam, Pakistan & Modern World	61	/100
655	Practical Component	74	/100

Elective Courses

0517	TEACHING OF PAKISTAN STUDIES	61	/100
0526	TEACHING OF ISLAMICAT	60	/100

TOTAL 553/610

He/She has obtained 61 % marks and has been placed in grade B

Result Declared On

Date: 17/05/2004

Jasim
Controller of Examinations

Note: The Detailed Marks Sheet is issued, errors and omissions excepted, as a notice only. An entry appearing in it does not in itself confer any right or privilege independently to the grant of a proper certificate which will be issued under the Regulations, in due course.

Date of Issue: JUN 05 2004

Attested
Head/Master
Govt. High School
Shahpore, Abbottabad

15

Allama Iqbal Open University Islamabad



Serial No. 23292

Certified that Mr. / Ms. SAFDAR ALI

Son / Daughter of ALI AKBAR

Registration No: 96-NAD-0699 Roll No: P-647742

having successfully completed the prescribed requirements
in semester SPRING 2005 is awarded the degree of

Master of Education (M.Ed.)

He/She has secured 59 % marks and has been placed in C grade.

ATTESTED
[Signature]

CONTROLLER OF EXAMINATIONS

Attested
[Signature]

VICE-CHANCELLOR

Result declared on: March 14, 2006

Date of Issue: March 14, 2011

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY



(16)

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

ANNEXURE

C

Dated Peshawar, 11.07.2012

NOTIFICATION:

No. SO (E & S) VI-18/1852/2012: Sanction of the Government of Khyber Pakhtunkhwa is hereby accorded to the up gradation of the posts for Grant of Incentive of Higher Pay Scale to different Categories/Cadres of teachers in Elementary & Secondary Education Department w.e.f. 01-07-2012 as per details given below:-

Designation of Teaching Cadre/Post	Location	Existing Basic Pay Scale	New Approved Basic Pay Scale	Remarks
Primary School Teacher (PST)	Cvt. Primary School	BPS-3 BPS-6 BPS-7 BPS-9 BPS-10 BPS-12	(BPS-12)	The post of PST is upgraded to BPS-12. Accordingly, 33,497 posts of PSTs, already sanctioned in various pay scales are upgraded to BPS-12 for the present incumbents as well as future appointees.
Senior Primary School Teacher (Sr. PST)	"do"	Newly Upgraded/Redesignated Post	(BPS-14)	22,231 posts of the existing PSTs in various existing pay scales are upgraded to BPS-14 and redesignated as Senior PST. The posts will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
Primary School Head Teacher (PSHT)	"do"	Newly Upgraded/Redesignated Post	(BPS-15)	20,004 posts of the existing PSTs (one post in each Primary School) are upgraded to BPS-15 and redesignated as Primary School Head Teacher, and will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
Central Cadres (CA)	Cvt. Middle/High/Higher Secondary School	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of CAs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
Senior Categorized Teachers (Sr. CT)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One third (1/3 rd) of the total CT posts are upgraded to BPS-16 and redesignated as Senior CTs which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
Arabic Teacher (AT)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of ATs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
Senior Arabic Teachers (Sr. AT)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One third (1/3 rd) of the total AT posts are upgraded to BPS-16 and redesignated as Senior AT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
Teacher of Technology (TT)	"do"	BS-07 BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of TTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
Senior Teacher of Technology (Sr. TT)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One third (1/3 rd) of the total TT posts are upgraded to BPS-16 and redesignated as Senior TT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
Drawing Master (DM)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of DMs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
Senior Drawing Master (Sr. DM)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One third (1/3 rd) of the total DM posts are upgraded to BPS-16 and redesignated as Senior DM, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.

ATTESTED

[Signature]

Physical Education Teachers (PETs)	"09"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of PETs are upgraded to BPS-15 for all present incumbents to the post as well as for the new appointments.
Senior Physical Education Teachers (Sr. PETs)	"10"	Newly Upgraded/ Redesignated Post	(BPS-16)	One third (1/3 rd) of the total PETs posts are upgraded to BPS-16 and redesignated as Senior PET, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, (M.O.A. for the post.
Qari/Qaris	"10"	BPS-7 BPS-9 BPS-10 BPS-12 BPS-14 BPS-15	(BPS-12)	All the existing posts of Qari/Qaris are upgraded to BPS-12 for the present incumbents to the post as well as for the new appointments.
Junior Qari/Qaris	"08"	Newly Upgraded/ Redesignated Post	(BPS-15)	One third (1/3 rd) of the total Qari/Qaris posts are upgraded to BPS-15 and redesignated as Senior Qari/Qaris, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if not for the post.

2. A policy shall also be devised in the framework of input/output criteria in terms of qualification, length of service, regularity, punctuality, results, curricular and co-curricular achievements and other performance indicators, so that the teachers do not take the scheme for granted but work for it.

3. District wise/ school wise breakup of the posts is enclosed herewith as Annexure.

SECRETARY

Encl: No. SO(FR)/FD/10-22(E)/2010 Dated Pesh: the 16/07/2012

Copy is forwarded to Accountant General Khyber Pakhtunkhwa, Peshawar.
All District Account Officers

SECTION OFFICER (FR)
FINANCE DEPARTMENT

Encl: Of even Number & Date.

Copy of the above is forwarded to:-

1. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department, with reference to his letter No SO(FR)/FD/10-22(E)/2010 dated 26.04.2012.
2. P.S. to Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
3. P.S. to Special Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
4. P.S. to Deputy Secretary-II, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
5. P.S. to Minister of E&SE, Khyber Pakhtunkhwa.
6. The Director, E&SE Khyber Pakhtunkhwa, Peshawar.
7. All the Executive District Officers, E&SE, Khyber Pakhtunkhwa.
8. The Managing Director, Printing Press, Khyber Pakhtunkhwa, Peshawar.
9. Master file.

ATTESTED

(HOOR ALAM KHAN WAZIR)
SECTION OFFICER (B&A)
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

[Handwritten signature]



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

No. SO(PE)4-5/Meeting/2013/Teaching Cadre
Peshawar, dated the 20th December, 2013.

To

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

Subject: Filling of Vacant Posts in Higher Secondary
Schools/High / Middle/ Primary.

I am directed to convey the approval of the Competent Authority for filling of Vacant posts in BPS-16 and BPS-15 and below in HSS/High/Middle and Primary School in the following manner.

a) Vacant Posts in BPS-16.

The following 4545 posts of Teaching Cadre SST (Bio, Maths, General etc) falling in B-16 are lying vacant throughout the province District wise detail is as under:-

S.No.	District	SST SCIENCE Bio/Chem B-16		SST SC MATHS/PHY B-15		SST General B-16		Total		Total
		M	F	M	F	M	F	M	F	
3	Abbott Abad	33	16	42	40	94	16	139	74	213
4	Attock	16	21	51	21	0	64	67	106	173
5	Batha Gram	27	5	25	6	28	22	55	34	89
6	Buner	18	19	58	23	80	49	158	91	249
7	Charsadda	28	12	45	33	34	26	107	71	178
8	Chitral	20	0	45	15	23	0	88	15	103
9	DI Khan	60	10	56	41	61	0	177	51	228
10	Dir Lower	40	27	40	39	60	72	140	138	278
11	Dir Upper	31	6	38	7	91	11	160	24	184
12	Faizabad	21	9	26	9	34	28	64	46	110
13	Haripur	61	5	20	40	70	36	151	81	232
14	Karok	49	13	16	23	23	16	88	52	140
15	Kohat	36	6	40	25	91	39	167	70	237
16	Kohistan	24	1	31	1	121	23	176	25	201
17	Lakki Marwat	33	11	34	19	15	30	82	60	142
18	Malakand	17	9	5	27	1	1	23	37	60
19	Manshera	55	15	41	41	79	45	185	101	286
20	Mardan	37	21	41	15	87	52	165	139	304
21	Mirpurkhori	37	27	22	20	92	33	171	100	271

ATTESTED

[Signature]

22	Peshawar	43	0	55	22	42	8	140	30	270
23	Shangla	24	5	33	5	41	21	98	31	129
24	Swabi	56	12	38	54	74	52	168	118	286
25	Swat	22	11	45	25	13	13	80	49	129
26	Tank	32	3	23	7	39	15	84	35	119
27	Thor Cher	3	0	4	0	32	1	39	1	40
Total Vacancies		186	275	205	609	1275	675	2086	1550	3636

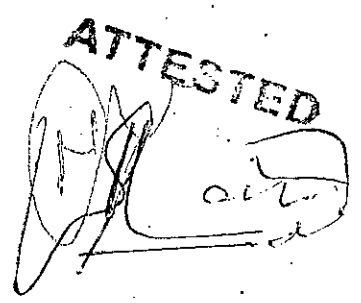
2. According to the existing Recruitment Rules these vacancies may be filled in the following manner

Method of Recruitment	SST SCIENCE Bio / Chem B-16		SST SCIENCE Maths / Phy B-16		SST General B-16		Total		Total
	M	F	M	F	M	F	M	F	
	25% Initial Recruitment.	301	60	226	152	320	165	797	
10% by promotion from S CT/CT	322	110	362	244	510	270	1,104	624	1,728
20% by promotion from PSHT/SFS/PST	161	35	101	122	255	135	592	312	904
1% by promotion from SDM/DM	32	11	36	24	51	27	119	62	181
4% by promotion from SAT/AT	32	11	36	24	51	27	119	62	181
4% by promotion from STT/TT	32	11	36	24	51	27	119	62	181
3% by promotion from S.Qari/Qari	31		27	18	38	20	90	47	137
Total	806	275	905	609	1275	675	2,086	1,550	3,636

3. In pursuance of the Approval of the Competent Authority, the following post be advertised on adhoc school-based.

District	SST/SC Bio /Chem B-16		SST/SC Maths/Phy B-16		SST Arts B-16		Total		Total
	M	F	M	F	M	F	M	F	
Abbottabad	13	4	10	10	11	5	24	15	39
Bahawal	4	5	13	5	-	15	17	26	43
Batta Gram	6	2	7	2	7	6	20	10	30
Buner	5	4	11	6	20	12	30	22	52
Charsadda	7	3	11	8	9	6	27	17	44
Chitral	5	0	11	4	6	0	22	4	26
D.I Khan	15	2	14	10	15	0	44	12	56
Dir Lower	10	7	10	10	15	17	35	34	69
Dir Upper	8	2	9	2	23	3	40	7	47
Hangu	6	2	7	2	9	7	21	11	32
Haripur	15	1	5	11	17	9	32	20	52
Katak	5	3	4	6	6	4	15	13	28
Kohat	9	0	10	6	23	10	42	17	59
Kohistan	6	0	8	2	20	6	34	6	40
Lahore District	4	2	3	4	4	7	20	15	35
Margalla	4	2	1	5	9	0	6	3	14

ATTESTED



Manshra	12	4	13	10	20	11	46	25	71
Mardan	9	5	10	14	22	13	41	32	73
Naushetra	9	9	8	23	8	43	15	66	
Peshawar	11	0	14	6	11	2	35	5	49
Shangla	6	1	3	1	10	5	25	7	32
Sوات	14	3	10	17	18	15	42	29	71
Swat	6	3	11	6	3	3	20	12	32
Tank	5	1	6	2	10	4	20	7	27
Toor Gher	-	1	0	0	0	0	0	0	0
Total	200	66	220	151	323	167	746	382	1,179

4. The above Vacancies may be filled in the following manner :-

S.No	NOMENCLATURE	MINIMUM QUALIFICATION AND EXPERIENCE FOR INITIAL APPOINTMENT OR BY TRANSFER	AGE LIMIT
1.	Secondary School Teacher (Maths Physics) (B-16)	At least Second class Bachelor's Degree from a recognized University with the following Two subject I. Physics, II. Maths A or B or Statistics) and Bachelor of Education or Master of Education (Industrial art or Business Education) or M.A Education or equivalent qualifications from a recognized University.	21 to 35 Years ✓
2.	Secondary School Teacher (Bio, Chem) (B-16)	At least Second class Bachelor's Degree from a recognized University with the following Two subject I. Chemistry, II. (Botany or Zoology), and Bachelor of Education or Master of Education (Industrial art or Business Education) or M.A Education or equivalent qualifications from a recognized University.	21 to 35 Years
3.	Secondary School Teacher (General) (B-16)	At least Second class Bachelor's Degree from a recognized University with the following Two subject in Humanities and other equivalent groups at degree level with English as Compulsory Subject. and Bachelor of Education or Master of Education (Industrial art or Business Education) or M.A Education or equivalent qualifications from a recognized University.	21 to 35 Years

Selection Criteria

- I. Appointment through initial recruitment on adhoc shall be made through Merit on School base.
- II. For selection of suitable candidate by initial recruitment, Total 200 marks shall be distributed in the following manner:-

- (a) Screening Test conducted by Independent third party (NTS) = 100 Marks
- (b) Academic Qualification = 100 Marks

These 100 marks will be further distributed as under:-

ATTESTED

Category of Qualification	(Total marks 100)
SSC	Marks obtained X 20 / total marks =
HSSC	Marks obtained X 20 / total marks =
BA/ BSc	Marks obtained X 20 / total marks =
MA/MSc	Marks obtained X 15 / total marks =
Minimum Professional qualification required for posts	Marks obtained X 15 / total marks =
M.Ed / MA Edu	Marks = 05
MPhil/PhD	Marks obtained X 5 / total marks =

5. Meeting with NIS authorities may be conducted. NIS will charge Rs.300/- per Application form is one candidate apply for 5 schools then the NIS will charge Rs.1200/- for 5 Application form and the NIS fee will be borne by the candidates.
6. The remaining 3409 vacancies may be filled through promotion from the concerned districts with following break up under the Revised Recruitment Rules 2013 as SSRC has been conducted and Minutes have been signed by all the members and a note to Chief Secretary is being moved.

District	SST/SC Bio /Chem B-16		SST/SC Maths /Phy B-16		SST General B-16		Total		Total
	M	F	M	F	M	F	M	F	
40% by promotion from S CT/CT	322	110	362	244	510	320	1,194	624	1,818
20% by promotion from PSST/SPST/PST	161	55	191	122	256	135	597	312	909
4% by promotion from SDM/DM	32	11	36	24	51	27	119	62	182
4% by promotion from SAT/AT	32	11	36	24	51	27	119	62	182
4% by promotion from STT/TT	32	11	36	24	51	27	119	62	182
3% by promotion from S.Qari/Qari	24	8	27	18	38	20	90	47	136
Total	603	206	678	456	956	506	2238	1169	3409

b) Vacant Posts in BPS-15 and Below.

The vacant posts in BPS-15 and below should be advertised on adhoc school-based through NIS as per the following selection criteria, Nomenclatures of the posts, Qualification, Age will remain the same as per existing Service rules, and the process of appointment in those districts where the posts have already been advertised under the existing rules be stopped and the advertisement may be withdrawn to avoid litigation.

Selection Criteria

Appointment through initial recruitment on adhoc shall be made through Merit on School base for selection of suitable candidate by initial recruitment, Total 200 marks shall be distributed in the following manner:-

- (a) Screening Test conducted by Independent third party(NIS)= 100 Marks
- (b) Academic Qualification = 100 Marks

These 100 marks will be further distributed as under:-

ATTESTED



Category of Qualification	(Total marks 100)
SSC	Marks obtained X 20 / total marks =
HSSC	Marks obtained X 20 / total marks =
BA/ BSc	Marks obtained X 20 / total marks =
MA/MSc	Marks obtained X 15 / total marks =
Minimum Professional qualification required for posts	Marks obtained X 15 / total marks =
M.Ed / MA Edu	Marks = 05
MPhil/PhD	Marks obtained X 5 / total marks =

[Signature]
SECTION OFFICER
(Primary)

Enclst : of even No & date:

1. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
2. The Director, (PTTE) Khyber Pakhtunkhwa Peshawar.
3. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
4. All District Education Officer (M&F) in Khyber Pakhtunkhwa.
5. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
6. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
7. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
8. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.
9. Master file

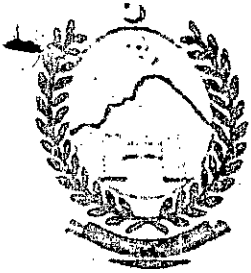
[Signature]
SECTION OFFICER
(Primary)

ATTESTED

[Signature]

13/11/11

23



Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

ANNEXURE
E

NOTIFICATION

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11.7.2012 and Finance Department Endorsement No.SO(FR)/FD/ 10-22(E)2010 dated 16.7.2012, the following CT/SCT, DM/SDM, AT/SAT, TT/STT, Qari/S.Qari and PSHT/SPST/PST (Male) are promoted to the posts of SST (General), SST (Bio/Chem) and SST (Maths/Phy) in BPS-16 (Rs.28070-2260-95870) respectively, plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect.

A.SST (General)

ITEM No.1 PROMOTION OF SCT MALE TO THE POST OF SST (G) BPS.16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	50
25% Initial Recruitment of SST (G)	13
75% Promotion Quota of SST (G)	37
40% SCT/CT Quota to SST(G)	20
Posts Available for Promotion (G)	20
Proposed SCT for Promotion to SST (G)	20

S e	Sn o	Name of Official	Name of School	Date of Birth	Date of Promotion as SCT	Qualificati on Acad: Prof:	Remarks
1	20	Abdul Razaq SCT	GCMHS Abbottabad	7/8/1964	28-02-2013	MA Isl: B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
2	22	Aman Ullah SCT	GHSS Nawansher	15-05-1963	28-02-2013	MA Isl: B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect
3	166	Jadoon Akhtar SCT	GHS No.1 Havelian	7/4/1969	28-02-2013	MA Urdu. M.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ATTESTED

24

Promotion Order of SST of District Abbottabad (M) 2022

4	189	Naseem Akhtar SCT	GHSS No. 1 Atd	15/02/1970	24-11-2014	MA Urdu/ P:ST M.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
5	190	Muhammad Sarfaraz SCT	GHS Kanthiali	15/05/1968	24-11-2014	MA Eng: M.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
6	193	Iltaf Khan SCT	GHSS No.1 Atd	09/04/1974	24-11-2014	MA M.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) DPS-16 on regular basis with immediate effect.
7	194	Saeed Rabbani SCT	GHS Chamhad	01/03/1967	24-11-2014	MA, POL:SC: M.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
8	195	Muhammad Javed SCT	GHSS BandiDhundan	16/04/1968	24-11-2014	BA B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
9	196	Attiq Ur Rehman SCT	GCMHS Abbottabad	27/05/1974	24-11-2014	MA Isl:St: M.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
10	197	Azhar Iqbal Jadoon SCT	GHSS Nawansher	10/04/1968	24-11-2014	BA B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ATTESTED
X

25

Promotion Order of SST of District Abbottabad (M) 2022

11	200	Abdul Qayyum SCT	GHSS No. 1 Abbottabad	07/06/1971	24-11-2014	BA B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
12	202	Muhammad Asif Khan SCT	GHS Mirpur	14/04/1971	5/26/2015	BA B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
13	204	Zulfiqar Ali SCT	GHS Chamhat ti	01/04/1967	31-07-2015	BA B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
14	205	Qaisar Javed SCT	GHSS No.1 Attd	15/03/1972	31-07-2015	M.A Pol: Sc: B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
15	206	Aftab Ahmed SCT	GHSS BandiDh undan	01/11/1969	31-07-2015	BA M.Sc: Edu:	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
16	207 ^a	Iftikhar Ahmad SCT	GHS SHEIKH UL BANDI	18/06/1968	31-07-2015	BA B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
17	208	Manzoor Hussain SCT	GHS NamliMaira	15/03/1965	31-07-2015	BA B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ATTESTED

26

Promotion Order of SST of District Abbottabad (M) 2022

ITEM No.2 PROMOTION OF SDM (BPS-16) MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS.

Total No. of Vacant Post of SST(G)	
25% Initial Recruitment of SST (G)	50
75% Promotion Quota of SST (G)	13
4% SDM/DM Quota to SST(G)	37
Posts Available for Promotion (G)	2
Proposed SDM for Promotion to SST (G)	2

S #	S n #	Name of Official	Name of School	Date of Birth	Date of Promotion as SDM	Qual:	Remarks
1	28	Zahoor Khan SDM	GHS Banda Pir Khan	4-Jan-65	26/2/13	MA History B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
2	29	Muhammad Tariq SDM	GHSS No.3 A/Abad	1-Mar-66	26/2/13	BA M.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM No.3 PROMOTION OF SAT (BPS-16) MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	
25% Initial Recruitment of SST (G)	50
75% Promotion Quota of SST (G)	13
4% SAT/AT Quota to SST(G)	37
Posts Available for Promotion to SST (G)	2
Proposed SAT for Promotion to SST (G)	2

S #	S n #	Name of Official	Name of School	Date of Birth	Date of Promotion as SAT	Qual:	Remarks
1	50	Muhammad Farid SAT	GHS Chamhatti	2/Nov /67	18/May/16	MA(Arabic) B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
2	52	Aurangzeb SAT	GHS Jhangra	4/May /74	15/Feb/17	MA(Isl) B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM No.4 PROMOTION OF STT (BPS-16) MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	
25% Initial Recruitment of SST (G)	50
75% Promotion Quota of SST (G)	13
4% STT/TT Quota to SST(G)	37
Posts Available for Promotion to SST (G)	2
Proposed STT for Promotion to SST (G)	2

WTS

(27)

Promotion Order of SST of District Abbottabad (M) 2022

S #	Name of Official	Name of School	Date of Birth	Date of Promotion as SST	Qual:	Remarks
5	Imdad Ullah STT	GHS Kuthiala ATD	15-04-1977	26/Feb/13	MA- Isl/B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
26	Muhammad Sohail STT	GHSS Kokal Bar seen	17/Nov/77	26/Feb/13	MA Isl/B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM No.5 PROMOTION OF S.QARI (BPS-16) MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	50
25% Initial Recruitment of SST (G)	13
75% Promotion Quota of SST (G)	37
3% Qari/S.Qari Quota to SST(G)	1
Posts Available for Promotion to SST (G)	1
Proposed S.Qari for Promotion to SST (G)	1

S #	Sn #	Name of Official	Name of School	Date of Birth	Date of Promotion as S. Qari	Qual:	Remarks
1	16	Zia Ur Rehman S.Qari	GHS No.1 Havelian	28-Apr-79	23-02-2013	MA (Isl) B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM No.6 PROMOTION OF PSHT/SPST/PST MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	50
25% Initial Recruitment of SST (G)	13
75% Promotion Quota of SST (G)	37
20% PSHT/SPST/PST Quota to SST(G)	10
Posts Available for Promotion to SST (G)	10
Proposed PSHT/SPST/PST for Promotion to SST (G)	10

S #	Sn #	Name of Official	Name of School	Date of Birth	Date of Appointment as PST	Qual:	Remarks
1	100	Muhammad Mahroof PSHT	GPS Chamak Miara	5/3/1970	1/10/1993	MA, B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ATTESTED

S #	Sn #	Name of Official	Name of School	Date of Birth	Date of Promotion as SST	Qual:	Remarks
1	5	Imdad Ullah STT	GHS Kuthiala ATD	15-04-1977	26/Feb/13	MA- Isl/B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
2	26	Muhammad Sohail STT	GHSS KokalBar seen	17/Nov/77	26/Feb/13	MA Isl/B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM No.5 PROMOTION OF S.QARI (BPS-16) MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	50
25% Initial Recruitment of SST (G)	13
75% Promotion Quota of SST (G)	37
3% Qari/S.Qari Quota to SST(G)	1
Posts Available for Promotion to SST (G)	1
Proposed S.Qari for Promotion to SST (G)	1

S #	Sn #	Name of Official	Name of School	Date of Birth	Date of Promotion as S. Qari	Qual:	Remarks
1	16	Zia Ur Rehman S.Qari	GHS No.1 Havelian	28-Apr-79	23-02-2013	MA (Isl) B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM No.6 PROMOTION OF PSHT/SPST/PST MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	50
25% Initial Recruitment of SST (G)	13
75% Promotion Quota of SST (G)	37
20% PSHT/SPST/PST Quota to SST(G)	10
Posts Available for Promotion to SST (G)	10
Proposed PSHT/SPST/PST for Promotion to SST (G)	10

S #	Sn #	Name of Official	Name of School	Date of Birth	Date of Appointment as PST	Qual:	Remarks
1	100	Muhammad Mahroof PSHT	GPS Chamak Miara	5/3/1970	1/10/1993	MA, B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ATTESTED

29

REGULATION ORDER of SST of District Abbottabad (M) 2022

2	101	Zaffar Saeed PSHT	GPS Dhanmi	2/1/1972	1/10/1993	BA B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
3	103	Muhammad Sudheer PSHT	GPS Mohar Kalan	3/9/1972	1/10/1993	MA B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
4	106	Liaqat Khan PSHT	GPS Chooma Kari	4/15/1967	2/24/1993	MA B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
5	108	Muhammad Saeed PSHT	GPS Sian Da Katha	11/2/1968	2/24/1993	MA B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
6	109	Taimur PSHT	GPS Pando Thana	3/10/1970	2/24/1993	BA B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
7	114	Muhammad Haroon PSHT	GPS Banda Noor Ahmed	5/21/1971	2/24/1993	BA B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
8	116	Sadaqat Ali PSHT	GPS Magri Tarli	5/5/1972	2/24/1993	BA B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ATTESTED

30

Promotion Order of SST of District Abbottabad (M) 2022

9	119	Waheed PSHT	GPS NagriBala	5/16/1973	2/24/1993	BA B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
10	120	Muhammad Mukhtiar PSHT	GPS Chamiali	5/21/1973	2/24/1993	MSC /MA B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

B. SST (Maths/Phys)

ITEM No.1 PROMOTION OF CT MALE TO THE POST OF SST (P/M) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(P/M)	16
25% Initial Recruitment of SST (P/M)	4
75% Promotion Quota of SST (P/M)	12
40% CT/SCT Quota to SST(P/M)	6
Posts Available for Promotion to SST (P/M)	6
Proposed CT/SCT for Promotion to SST (P/M)	6

S #	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular CT	Qual:	Remarks
1	233	Muhammad Ishaq CT	GHS BAGH	15-03-1990	14-03-2015	M.Sc: /B.Sc: Maths A only Phy: & Electroni es. M.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.
2	235	Zia Ur Rehman CT	GMS Thathi Ahmed Khan	15-03-91	14-03-2015	Msc Phy: B.E	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.
3	236	Rizwan Rasheed Khan CT	GHSS BandiDhub dan	8/6/1986	14-03-2015	Msc Phy M.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.
4	239	Abdur Rahim Khan CT	GHSS No.1 Atd	3/15/1984	2/29/2016	M.Sc: /B.Sc: Maths A only Phy: & Electroni es. M.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.

31

Promotion Order of SST of District Abbottabad (M) 2022
ITEM No.2 PROMOTION OF PSHT/SPST/PST MALE TO THE POST OF SST (P/M) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(P/M)	16
25% Initial Recruitment of SST (P/M)	4
75% Promotion Quota of SST (P/M)	12
20% PSHT/SPST/PST Quota to SST(P/M)	3
Posts Available for Promotion to SST (P/M)	3
Proposed PSHT/SPST/PST for Promotion to SST (P/M)	3

S #	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular PST	Qual:	Remarks
1	183	Muhammad Munir PST	GPS No.1 Havelian	15.05.87	15.10.14	M.Sc(Phy.) M.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.
2	186	Muhammad Intiaz PST	GPS Shadial	12.12.90	15.10.14	M.Sc (Math) B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.
3	187	Basit Ali Khan PST	GPS Chamahad	20.01.88	15.10.14	M.Sc (Math) B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.

C. SST (B/C)

ITEM No.1 PROMOTION OF PST/SPST/PSHT MALE TO THE POST OF SST (B/C) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(B/C)	14
25% Initial Recruitment of SST (B/C)	4
75% Promotion Quota of SST (B/C)	10
20% PST/SPST/PSHT Quota to SST(B/C)	3
Posts Available for Promotion to SST (B/C)	3
Proposed PST/SPST/PSHT for Promotion to SST (B/C)	3

S #	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular PST	Qual:	Remarks
1	209	Samiullah Khan PST	GPS Hall Syedan Sherwan	10.10.90	15.10.14	B.Sc (Bio Chem) B.Ed	Services are placed at the disposal of DEO Male Abbottabad for further adjustment against the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.

ATTESTED

(32)

Terms and Conditions:-

1. They shall be on probation for the period as specified in Rules (17) substituted vide G.O (P.W.S.)/E&SE/13/2017 Dated 07/12/2017 in Appointment, Promotion and Transfer Rules, 1989.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Sec. seniority on lower post will remain intact as per Rule (17)(4) of Appointment, Promotion and Transfer Rules, 1989.
6. No TA/DA is allowed for joining the duty.
7. They will give an undertaking to be recorded in their service books to the effect that if any over payment is made to them in light this order, will be recovered and if they are wrongly promoted, they will be reversed.
8. Before handing over charge, their documents may be checked. If they have not the required relevant qualification as per rules, they may not be handed over the charge of the post.

(Hafiz Dr. Muhammad Ibrahim)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No 3912-16 / File No. 1/Promotion of SST (BPS-16)/2022 Dated Peshawar the 21/12/2022
Copy forwarded for information and necessary action to the:-

1. District Education Officer (M) Abbottabad.
2. District Accounts Officer Abbottabad.
3. Officials Concerned.
4. Principal/HM Concerned.
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
7. M/File.

(Signature)
Assistant Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

ATTESTED

(Signature)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD.

NOTIFICATION.

In pursuance to the Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar Notification issued vide Endst No. 3912-16/File No.1 Promotion of SST (BPS-16)/2022 dated 01-12-2022, the following SCT/CT, SDM/DM, SAT/AT, STT/TF, S.Qari/Qari and PSHT/SPST/PST (Male) are promoted to the post of SST (General), SST (Bio/Chem) and SST (Maths/Physics) in BPS-16 (Rs.28070-2260-95870) respectively, plus usual allowances as admissible under the Rules on regular basis under the existing policy of the provincial Government on the terms and conditions given below and they are hereby further posted against vacant post in the schools noted against their names with immediate effect.

S. NO.	SEN NO	NAME OF TEACHER	NAME OF SCHOOL	DATE OF BIRTH	PLACE OF POSTING	REMARKS
ITEM NO.1 SCT TO SST (G) BPS-16 ON REGULAR BASIS.						
1	20	Abdul Razaq SCT	GMHS (Boys) Abbottabad	7/8/1964	GHS Pawa	Promoted & Posted as SST (G) against Vacant Post
2	22	Aman Ullah SCT	GHSS Nawanshehr.	15-05-1963	Refusal submitted	Promoted & Posted as SST (G) against Vacant Post
3	166	Iqbal Akhtar SCT	GHS No.1 Havelian	7/8/1969	GHS No.1 Havelian	Promoted & Posted as SST (G) against Vacant Post
4	189	Naseem Akhtar SCT	GHSS No.1 Atk	15/02/1970	GHS Pawa	Promoted & Posted as SST (G) against Vacant Post
5	190	Muhammad Sarfaraz SCT	GHS Kuthiala	15/05/1968	GHS Kuthiala	Promoted & Posted as SST (G) against Vacant Post
6	193	Hafiz Khan SCT	GHSS No.1 Atk	09/04/1974	GHS Talia Sheikhhan	Promoted & Posted as SST (G) against Vacant Post
7	194	Saeed Rabbani SCT	GHS Chamhali	01/03/1967	GHS Havelian No.1	Promoted & Posted as SST (G) against Vacant Post
8	195	Muhammad Javed SCT	GHSS Bandi Dhundan	16/04/1968	GHS Tarnawal	Promoted & Posted as SST (G) against Vacant Post
9	196	Atiq-ur Rehman SCT	GMHS Abbottabad	27/05/1974	GHS Kuthiala	Promoted & Posted as SST (G) against Vacant Post
10	197	Azhar Iqbal Iqbal SCT	GHSS Nawanshehr	10/04/1969	Refusal Submitted	Promoted & Posted as SST (G) against Vacant Post
11	200	Abdul Qayyum SCT	GHSS No.1 Abbottabad	07/06/1971	GMS Majuhan	Promoted & Posted as SST (G) against Vacant Post
12	202	Muhammad Asif Khan SCT	GHS Mirpur	14/04/1971	GHS Namli Maira	Promoted & Posted as SST (G) against Vacant Post
13	204	Zulfiqar Ali SCT	GHS Chamhali	01/04/1967	GHS Sherwan	Promoted & Posted as SST (G) against Vacant Post
14	205	Qasim Javed SCT	GHSS No.1 Atk	15/03/1972	GHS Ghori	Promoted & Posted as SST (G) against Vacant Post
15	206	Ahmad Ahmed SCT	GHSS Bandi Dhundan	01/11/1969	GHS Pind Kargu Khan	Promoted & Posted as SST (G) against Vacant Post
16	207	Muhammad Ahmad SCT	GHS SHEIKH UL BANDI	18/06/1968	GHS Pind Kargu Khan	Promoted & Posted as SST (G) against Vacant Post
17	208	Manzoor Hussain SCT	GHS Namli Maira	15/03/1965	GHS Namli Maira	Promoted & Posted as SST (G) against Vacant Post
ITEM NO. 2 SDM TO SST (G) BPS-16 ON REGULAR BASIS.						
18	28	Zahoor Khan SDM	GHS Banda Pir Khan	4-Jan-65	GMS Riyala	Promoted & Posted as SST (G) against Vacant Post
19	29	Muhammad Tariq SDM	GHSS No.3 A/Abad	1-Mar-66	GMS Rankot	Promoted & Posted as SST (G) against Vacant Post
ITEM NO.3 SAT TO SST (G) BPS-16 ON REGULAR BASIS.						
20	50	Muhammad Farid SAT	GHS Chamhali	2/Nov/67	GHS Boi	Promoted & Posted as SST (G) against Vacant Post
21	52	Aurengzeb SAT	GHS Jhangra	4/Nov/74	GMHS Havelian	Promoted & Posted as SST (G) against Vacant Post
ITEM NO.4 STT TO SST (G) BPS-16 ON REGULAR BASIS.						
22	5	Imdadullah STT	GHS Kuthiala ATD	15-04-1977	GHS Kuthiala	Promoted & Posted as SST (G) against Vacant Post
23	26	MUHAMMAD SOHAIL STT	GHSS Kekal Barseen	17/Nov/77	GHS Hazi Khetar	Promoted & Posted as SST (G) against Vacant Post

ATTESTED



ITEM NO.5 Qari/S.Qari TO SST (G) BPS-16 ON REGULAR BASIS.						
24	16	Zia-ur-Rehman S.Qari	GHS No.1 Havelian	28-Apr-79	GHS Havelian No.1	Promoted & Posted as SST (G) against Vacant Post.

ITEM NO.6 PSHT TO SST (G) BPS-16 ON REGULAR BASIS.						
25	100	Mohammad J. Mahroof PSHT	GPS Chamak Miana	5/3/1970	GMS Massah Gojri	Promoted & Posted as SST (G) against Vacant Post
26	101	Zaffar Saeed PSHT	GPS Dhanni	2/1/1972	GMS Tori Shareef	Promoted & Posted as SST (G) against Vacant Post
27	103	Muhammad.Sudheer PSHT	GPS Mohar Kalan	3/9/1972	GHSS Chamiali	Promoted & Posted as SST (G) against Vacant Post
28	106	Liaqat Khan PSHT	GPS Choona Kari	4/15/1967	GHS Toheed Abad	Promoted & Posted as SST (G) against Vacant Post
29	108	Muhammad Saeed PSHT	GPS Sian Da Kutha	11/2/1968	GHSS Khanispur	Promoted & Posted as SST (G) against Vacant Post
30	109	Taimur PSHT	GPS Pando Thana	3/10/1970	GMS Shaheed Abad	Promoted & Posted as SST (G) against Vacant Post
31	114	Muhamma J Haroon PSHT	GPS Banda Noor Ahmed	5/21/1971	GHSS Tajwal	Promoted & Posted as SST (G) against Vacant Post
32	116	Sadaqat Ali PSHT	GPS Nagri Tarli	5/5/1972	GHSS Satora	Promoted & Posted as SST (G) against Vacant Post
33	119	Wakeed PSHT	GPS Nagri Bala	5/16/1973	GHSS Nagri Bala	Promoted & Posted as SST (G) against Vacant Post
34	120	Muhammad Mukhtiar PSHT	GPS Chamiali	5/21/1973	GMS Battangi Khurd	Promoted & Posted as SST (G) against Vacant Post

B. SST (MATHS/PHYSICS)

ITEM NO.7 CT TO SST (M/P) BPS-16 ON REGULAR BASIS.

35	233	Muhammad Ishaq CT	GHS BAGH	15-03-1990	GHS Bagh	Promoted & Posted as SST (M/P) against Vacant Post.
36	235	Zia Ur Rehman CT	GMS Thathi Ahmed Khan	15-03-91	GHSS Khanispur	Promoted & Posted as SST (M/P) against Vacant Post.
37	236	Rizwan Rasheed Khan CT	GHSS Handi Dhubda	8/6/1986	GHSS Dalola	Promoted & Posted as SST (M/P) against Vacant Post
38	239	Abdur Rahim Khan CT	GHSS No.1 And	3/15/1984	GHSS Chamiali	Promoted & Posted as SST (M/P) against Vacant Post.

ITEM NO.8 PSHT/SPST/PST TO SST (M/P) BPS-16 ON REGULAR BASIS.

39	183	Muhammad Munir PST	GPS No.1 Havelian	15.05.87	GHSS Tajwal	Promoted & Posted as SST (M/P) against Vacant Post.
40	186	Muhammad Imtiaz PST	GPS Shadial	12.12.90	GHS Maira Rehmat Khan	Promoted & Posted as SST (M/P) against Vacant Post
41	187	Basir Ali Khan PST	GPS Chamahad	20.01.88	GHS Kukmarj	Promoted & Posted as SST (M/P) against Vacant Post

C. SST (BIO/CHEMISTRY)

ITEM NO.9 PST/SPST/PSHT TO SST (B/C) BPS-16 ON REGULAR BASIS.

42	209	Samullah Khan PST	GPS Hall Syedan Sherwan	10.10.90	GHS Chamhatti	Promoted & Posted as SST (B/C) against Vacant Post
----	-----	-------------------	-------------------------	----------	---------------	--

Terms & Conditions:

1. They will be on probation for a period as specified in Rules(15) substituted vide No. SO(Policies)/E&AD/1-3/2017 Dated 07-12-2017 in Appointment, Promotion and Transfer Rules, 1989.
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge report shall be submitted to all concerned.
5. Their inter-se-seniority on lower post will remain intact as per Rules (17)(4) of Appointment, Promotion and Transfer Rules-1989.
6. No. TA/DA is allowed for joining their duty.

- 7. They will give an undertaking to be recorded in their service books to the effect that if any over payment is made to them in the light of this order, will be recovered and if they are wrongly promoted, they will be reversed.
- 8. Before handing over charge their documents may be checked, if they have not the required relevant qualifications as per rule, they may not be handed over charge of the post.

9276-82

Sd/-
 (MUHAMMAD TANVEER)
 DISTRICT EDUCATION OFFICER (M)
 ABBOTTABAD.

Endst: No. _____ /EB-I/Promotion/SSTs/2022: Dated A.Abad the 12/12 /2022

Copy forwarded to the:

- 1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2. District Comptroller of Accounts Abbottabad.
- 3. District Monitoring Officer (EMA) Abbottabad.
- 4. All the Principals/Headmasters of concerned Schools.
- 5. PS to Secretary to Govt: of Khyber Pakhtunkhwa, E&SED Peshawar.
- 6. Sub Divisional Education Officer (M) Abbottabad, Havelian, Lora and Lower Tanwal.
- 7. Budget & Accounts Officer local office.
- 8. AP EMIS branch local office.
- 9. All the Teachers concerned.
- 10. Master File

[Signature]
 DISTRICT EDUCATION OFFICER (M)
 ABBOTTABAD

ATTESTED

[Signature]

To,

The Secretary Elementary and Secondary
Education Department KPK Peshawar.

Subject: Departmental Appeal against promotion order dated 01.12.2022
issued by Director Secretary Elementary and Secondary Education
Department KPK Peshawar.

Respected Sir!

1. That, appellant was initially appointed as a "TT" in BPS-07, at GMS Nakar Khan Kalan District Abbottabad on 21.11.1994 vide order Endst: No. 100.
2. That, the appellant passed his B.A Examination from AIOU, Islamabad in 2nd Division in the year 2002 and appellant got profession degree of B.Ed from AIOU Islamabad in the year 2004.
3. That, on 20/12/2013, Respondent No.1, issued a notification according to which 75% teachers (CT/SCT, DM/SDM, AT/SAT, TT/STT.Qaria/S.Qaria) were to be promoted to SST post and in the said 75/% Promotion Quota, 4% quota was also fixed for the promotion of TT / STT to SST post.
4. That, in the light of above mentioned notification dated 20/12/2013, most junior following Respondents / teachers, (TT and STT teachers) were promoted to SST posts vide different notifications issued by respondent No.2, but in the said promotion notifications, the name of appellant was not included for the promotion as SST BPS-16 although appellant fulfill prescribed qualification and promotion criteria for the post of SST BPS-16:
5. That, the seniority of any employee is to be considered from the date of first appointment of the employee according to the Rules, Law and Policy.
6. That, the impugned Notifications/orders were issued only at the basis of malafide intention in which law and Rules were not followed.
7. That, the appellant fulfills all the codal formalities for promotion into SST post because the appellant have a prescribed qualification alongwith seniority cum fitness.
8. That, respondents ignored the appellant from promotion which is not in the jurisdiction of respondents thus, respondents exceeded their power and intentionally ignored the appellant from promotion only to mentally torture the appellant.

It is, therefore, humbly prayed that on acceptance of the Departmental Appeal promotion order dated 01.12.2022 issued by Director Secretary Elementary and Secondary Education Department KPK Peshawar may kindly be cancelled / modified and the appellant may kindly be promoted w.e.f. the date at which the most junior teachers from promoted TT post to SST (G) BPS-16 with all back.

ATTESTED

Dated 02-12-2022

Yours Obediently

Safdar Ali Theology Teacher (TT)
GMS Jandar Bari District Abbottabad

S.No. 186244

Name of Advocate _____

DBA NO. _____

TBA NO. _____

BC No. _____



R.s.200/=

وکالت نامہ

BIBI SALMA
Finance Secretary
District Bar Association
Abbottabad

بعدالت KPK سرروس ٹریبونل کے نام

عنوان: نادیاہ حسن نام سکریٹری ESE وغیرہ

مخاطب: ایڈووکیٹ نوعیت مقدمہ سرروس

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی برائے پیشی یا تفتیہ مقدمہ بمقام ایڈووکیٹ آف انار کے لیے

عبدالرحمن عرف (03473146975)

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا اور بروقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر منظر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا کچھ باہر روز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ کچہری کے علاوہ کسی اور جگہ سماعت ہونے پر یا بروز تعطیل یا کچہری کے اوقات سے پہلے پیشی ہونے پر منظر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا محتال کے واپس کرانے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پرداخت صاحب موصوف مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراء کے وکالتی و نظر ثانی اپیل نگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرنے اور ہر قسم کارروائی وصول کرانے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر ثانی درجی نامہ و تظلم بر حلفہ کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے بیر و نجات از کچہری صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا نظر فرورخواست حکم استغاثی یا تقرری یا گرفتاری عمل از گرفتاری و اجراء ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ مختار پیروی کا اختیار ہوگا اور بصورت ضرورت صاحب موصوف کو وکالتی اختیار ہوگا کہ مقدمہ مذکور یا اس کے کسی جزوی کارروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے ہمارا مشورہ فرمائیں اور ایسے وکیل کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہونگے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ التوا پڑے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے کہ سندر ہے۔ مورخہ: 03/2023

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔ دن ماہ سال

نوٹ: وکالت نامہ کی فوٹو کاپی قابل قبول نہ ہوگی

Handwritten signature