


FORM OF ORDERSHEET

Court of _____

Case No.

874

/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	18.04.2023	As per direction of the Worthy Chairman the present appeal is fixed for preliminary hearing and decision on office objections before Single Bench at on  REGISTRAR

Respected Sir,

It is submitted that the present appeal was received on 17.03.2023 after thoroughly scrutinizing the same many deficiencies were found in it which was returned to the counsel for the appellant for completion and resubmission within 15 days which was to be resubmitted on 04-04-2023 but counsel for the appellant re-filed the same today on 18.04.2023 late by 14 days.

The appeal is submitted to your Honour under rule-7(c) of Khyber Pakhtunkhwa Service Tribunal rules 1974 for appropriate order please

Worthy Chairman

PH-10/0

be paid
18/4/23

REGISTRAR

18/4/2023

The appeal of Mr. Hawas Khan C.T GHS Jatta, Ismail Khel Tensli B.D, Shah district Karak received today i.e. on 17.03.2023 is incomplete on the following score which is returned to the Counsel for the appellant for completion and resubmission within 15 days:

- 1- ✓ Memorandum of appeal be got signed by the appellant.
- 2- ✓ Check list is not attached with the appeal.
- 3- ✓ Appeal has not been flagged marked with annexures marks.
- 4- ✓ Annexures of the appeal be attested.
- 5- ⑤ Copy of order dated 30.12.2020 & 25.5.2021 are not attached with the appeal which may be placed on it.
- 6- Annexures of the appeal are illegible which may be replaced by legible/better one
- 7- Departmental appeal having no date be dated.
- 8- Certificate be furnished that whether any appeal on the subject matter has earlier been filed in this Tribunal.
- 9- ✓ Nine more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 993 /S.T.

Dt. 21/3 /2023


REGISTRAR

SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Asharf Ali Khattak Adv.
High Court at Peshawar.

Objections attended, however seniority list could not be obtained. Separate application was submitted for the same, but DEOCM denied to provide the seniority list of SPST & PSHT. Appellant filed application before Commission RTI, who vide letter dated 07-04-2023 directed the DEOCM to provide the appellant required seniority list, but till date no seniority list has been provided to the appellant. Submitted for consideration and order,

12-04-2023
Ashraf Ali
Advocate

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA

SERVICE TRIBUNAL PESHAWAR

Appeal no 874/2023

Mr Hawas Khan..... Appellant

VERSUS

The Secretary Education E&SE & others... Respondents

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Memo of Application		1-2
2.	Affidavit		3
3.	Copies of the applications	A	4-6


Appellant

Through

Dated: 14.04.2023

ASHRAF ALI KHATTAK
ASHRAF ALI KHATTAK
Advocate, Supreme Court
Of Pakistan

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA

SERVICE TRIBUNAL PESHAWAR

Appeal No 874/2023

Mr Hawas Khan..... Appellant

VERSUS

The Secretary Education E&SE & others... Respondents

APPLICATION FOR ISSUANCE OF
DIRECTIONS TO THE RESPONDENTS TO
PROVIDE SENIORITY LIST OF SPST &
PSHT.

Respectfully Sheweth:

1. That the above titled Service Appeal has been filed by the Appellant before this Hon'ble Tribunal, which was later on returned due to certain objections.
2. That the Appellant was directed to submit Seniority List of SPST & PSHT, in respect of which the Appellant filed application to the DEO concerned and also filed an application to the RTI for providing of the Seniority List ibid, but the respondents are reluctant to provide the Seniority List. **(Copies of the applications are attached)**

2
3. That the directions may kindly be issued to the Respondents to provide the Seniority List of SPST & PSHT.


4. That there is no legal bar on acceptance of the instant Application.

It is, therefore, prayed that on acceptance of this Application, the respondents may kindly be directed to provide Seniority List of SPST and PSHT.


Appellant

Through

Dated: 14.04.2023


ASHRAF ALI KHATTAK
Advocate, Supreme Court
Of Pakistan

3
1

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Mr Hawas Khan..... Appellant

VERSUS

The Secretary Education E&SE & others... Respondents

AFFIDAVIT

I, **Ashraf Ali Khattak ASC**, as per instructions of my **client**, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


DEPONENT



محترم جناب D.E.O. پبلک اسکول تعلیم صالح کراچی
عنوان درخواست براد P.S.T سنیاری کنگ سال 2014 صالح کراچی

جناب عالی

گزارش کی جاتی ہے کہ میں نے 11-4-1993 کو P.S.T میں جمل بطور P.S.T
جارج سہیلہ، حورم 2013-5-09 کو P.S.T کے طور پر پروموشن
ہوا حورم 2015-12-31 کو بحیثیت P.S.O.H.T کو وینٹ برائیاں کول
مڈل میں تقرری ہوئی۔ اس کے بعد 2014-5-27 کو بحیثیت T.C
G.H.S حورم سنیاری میں ترقی ہوئی

آپ کو ان کے حورم میں اس کے مطابق ہے کہ مجھے سال 2014
کے P.S.T کا سنیاری لسٹ درکار ہے۔
میرا بی بی کے مذکورہ لسٹ جاری کر کے حکم صادر فرمائیں
آپ کا انتہائی مشکور رہوں گا

حورم 20-3-2023

الغافل

سہیلہ

تو اس میں ت.C کو وینٹ ہائی سکول حورم سنیاری میں
مذکورہ

No. 98

Forwarded for further necessary
action please.

N/L
20-03-2023
NIVAT ULIAN
HEAD MASTER
G.H.S Jara Wailkhar
8044

20-3-2023

5

مخدست جناب اسٹنٹ رجسٹرار صاحب
کے پی انفارمیشن کمیشن نزد اب درہ۔ ارباب کالونی پونپورسی روڈ پشاور
درخواست برآمد PST سنیارٹی لسٹ 2014ء ضلع کرک

KP-RTI COMMISSION	
Diary No:	2023
Date:	29-03-2023
Section:	AR-13

جناب عالی:

گزارش ہے کہ میں نے ڈائری نمبر 1257 مورخہ 20-3-2023 کو
ڈی۔ای او آفس کرک میں مندرجہ لسٹ و سہول کرنے کے لیے
درخواست دائر کیا ہے۔ لیکن ابھی تک لسٹ نہ دیا ہے
اور نہ دیتا ہے۔

بڑی مجبوری کی حالت میں عرض پرداز ہوں کہ مہربانی کر کے
PST سنیارٹی لسٹ سال 2014ء و سہول کرنے میں تعاون کر کے
مشکور فرمائیں۔ درخواست کاپی منسلک ہے۔

ملاحظہ: 29-3-2023

آپ کا دعا گو

حواں خاں سیٹی گورنمنٹ ہائی سکول جیم اسماعیل خیل
ضلع کرک
03139987591

Handwritten signature and stamp.

6



GOVERNMENT OF KHYBER PAKHTUNKHWA
REQUEST TO INFORMATION COMMISSION
Divisional Office Room 75, 1st Floor Complex RDA Kohat.
Email: arbab@kpicpk.gov.pk

No: KPIC/ARK/1-10269/2023
Dated: 07/04/2023
Diry no:0787-789/Kohat

To

The District Education Officer (DIO-M) District Karak.

Subject:
Memo.

COMPLAINT AGAINST NON SUPPLY OF INFORMATION (COMPLAINT NO: 10269)

I am directed to state that a citizen Mr Hawas Khan has filed an information request with your department for seeking some information, however the same was not provided to him within prescribed time limit therefore, he has filed a complaint before the KP Information Commission (copy attached)

- 2. It is to direct to provide the same to the complainant under section 10 of the KPRTI Commission within SEVEN working days of the receipt of this letter under intimation to KP Information Commission
- 3. Moreover the same be also proactively disclosed under section 5 of the KPRTI Act, 2013

Assistant Registrar,
KP Information Commission,
Divisional office Kohat.

Copy to:-

- 1. PS to Chief Information Commissioner, KP Information Commission, Peshawar
- 2. Assistant Registrar (Coordinator) KPIC Head Office
- 3. Mr Hawas Khan (Complainant)

ATTESTED

Assistant Registrar,
KP Information Commission,
Divisional office Kohat.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 874/2023

Mr. Hawas Khan
CT, Govt High School Jatta Ismail Khel,
Tehsil Bidi Shah District Karak

.....Appellant.

Versus

The Secretary Education E&SE
Civil Secretariat, Peshawar &
/ others.....Respondents.

INDEX

S.N	Description of Documents	Date	Annexure	Pages
1.	Memo of Service Appeal with affidavit.			1-6
2.	Copy of the promotion order to the post of PSHT dated 31.12.2014		A	7
3.	Copy of the Seniority list and order dated 20.02.2015		B	8-9
4.	Copy of Rules		C	10-14
5.	Copy of the Order dated 30.12.2020		D	15-17
6.	Copy of Order dated 26.05.2021		E	18-19
7.	Copy of the Departmental Appeal		F	20-
8.	Wakalat Nama			21

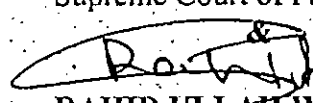

Appellant

Through

Dated: 16.03.2023


ASHRAF ALI KHATTAK

Advocate,
Supreme Court of Pakistan


RAHID ULLAH WAZIR
Advocate, Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 874 /2023Khyber Pakhtunkhwa
Service TribunalDiary No. 4445Dated 17/3/2023

Mr. Hawas Khan
CT, Govt High School Jatta Ismail Khel
Tehsil Bidi Shah District Karak

.....Appellant.

Versus

1. The Secretary Education E&SE
Civil Secretariat, Peshawar.
2. Director Education E&SE
Near Malik Saad BRT Terminal
GT Road, Firdous Peshawar.
3. The District Education Officer (E&SE)
District Karak
4. Hayat Muhammad (SCT)
GCMS Chokara, Karak
5. Zafar Ali Khan (SCT)
GHS Ghunda Shamshakai
Karak
6. Fazlullah (SCT)
GHSS Kandu Khel Karak
7. Muhammad Arif (SCT)
GHS Tarki Khel Karak

.....Respondents

**SERVICE APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT,
1974 AGAINST THE ORDER DATED 20.02.2015 AND
ORDER DATED 30.12.2020 WHEREBY JUNIOR TO THE
APPELLANT WERE PROMOTED TO THE POST OF CT
AND SENIOR CT AND WHEREAS APPELLANT WAS
PROMOTED TO THE POST OF CT ON 26.05.2021 WITH
IMMEDIATE EFFECT AND AGAINST WHICH**

**APPELLANT FILED DEPARTMENTAL APPEAL ON
28.11.2022 WHICH IS STILL PENDING WITHOUT
DISPOSAL.**

Prayer:-

On acceptance of this service appeal, this Hon'ble Court may graciously be pleased to:-

- 1. To Declare that the appellant was entitle for promotion to the post of CT w.e.f 20.02.2015 and to the post of Senior CT BPS-16 w.e.f 30.12.2020, when his juniors colleagues i.e respondents No 4 to 7 etc were promoted to the post CT and Senior CT.**
- 2. Direct the respondents to promote the Appellant to the post of CT not with immediate effect i.e 26.05.2021 but w.e.f 20.02.2015 and to the post of Senior CT BPS-16 w.e.f 30.12.2020 i.e the date when Juniors Colleagues were promoted.**
- 3. Any other relief which this Honorable Court deems appropriate but not specifically asked for may also be granted.**

Respectfully Sheweth,

Facts giving rise to the present service appeal are as under:

- 1. That the Appellant is presently serving against the post of CT at GHS Jatta Ismail Khel. He has about 30 years service at his credit with unblemished and clean sheet conduct record.**
- 2. That the appellant was initially appointed as PST in the year 1993 and was promoted to the post of SPST w.e.f 13.05.2013 and later on was promoted to the post of PSHT vide Order dated 31.12.2014. (Copy of the promotion order to the post of PSHT dated 31.12.2014 is attached as annexure A)**
- 3. That vide order dated 20.02.2015 Juniors to the Appellant were promoted to the post of CT and whereas Appellant being senior was ignored. (Copy of the Seniority list and order dated 20.02.2015 are attached as annexure B)**

4. That during this period Appellant was posted at GPS Shakar Khel Bidi Shah Karak, which a far-flung area without any sort of communication. The appellant was unaware of the development / promotion order of the respondents No 4 to 7 etc.
5. That it is pertinent to mention here that private respondents were promoted to the post of CT directly from the post of SPST (BPS-14) and whereas the appellant who was serving to the post of PSHT BPS-15 was ignored.
6. That it is pertinent to mention here that the appellant was entitled for promotion to the post of CT under the relevant rules but was intentionally ignored from his promotion. **(Copy of Rules are attached as annexure C)**
7. That the private respondents etc who were junior to the appellant from the very beginning were again promoted to the post of Senior CT vide order dated 30.12.2020 **(Copy of the Order dated 30.12.2020 is attached as annexure D)**
8. That the appellant agitated the matter with high ups who are sitting at the helm of Departmental Affairs and resultantly the appellant was also promoted to the post of CT vide order dated 26.05.2021 with immediate effect. **(Copy of Order dated 26.05.2021 is attached as annexure E)**
9. That the appellant was entitled for promotion to the post of CT w.e.f 20.02.2015 and was also entitle for promotion to the post of Senior CT w.e.f 30.12.2020 i.e the date on which junior and colleague of the appellant were promoted.
10. That being aggrieved from the acts and conducts of the respondents by not promoting the appellant w.e.f the date of his entitlement i.e the date when juniors colleagues were promoted to the post of CT and Senior CT and also being aggrieved from his promotion to the post of CT dated 26.05.2021, which was notified with immediate effect; filed Departmental Appeal on 28.11.2022 before the respondent No 2, which is still pending without disposal, hence the statutory period has elapsed,

therefore the instant Service Appeal inter on the following grounds:

(Copy of the Departmental Appeal is attached as annexure F)

GROUNDS:

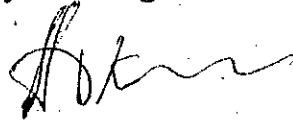
- A. That the respondents have not treated the appellant in accordance with law rules and policy on the subject and acted in violation of Article 3, 4, 10 A of the Constitution of Islamic Republic of Pakistan, 1973. Appellant was eligible and qualified in all respects for promotion to the post of CT & Senior CT from the moment his Junior Colleagues were promoted, therefore, the appellant was entitled to be considered for promotion to the post of CT and Senior CT at the relevant time. The non consideration of the appellant against the available existing vacancies was unlawful, illegal and against the law, rules and policy governing the subject.
- B. That appellant has been highly discriminated when came into the knowledge that the Junior most from the Appellant were promoted to the post of CT and then to the post of Senior CT while Appellant being qualified as per laid down criteria of promotion deprived from the right of promotion, which is violation of Article 25 and 27 of the Constitution of Islamic Republic of Pakistan, 1973. On this score as well, the appellant is entitled for promotion with effect from the date when the his juniors colleagues were promoted to the post of CT as well as to the post of Senior CT.
- C. That it is a settled law that an employee who was eligible and qualified to be promoted on regular basis during his service against the accrued vacancies but was not promoted; he shall not be denied promotion. The appellant was eligible and qualified as per promotion rules and policy as well as on the strength of minimum length of service, but respondents delayed the process of promotion of the appellant. Thus under the principle of law laid down by the Hon'ble Supreme Court of Pakistan; appellant is entitled for promotion w.e.f the date when his juniors were promoted to the post of CT and therefore to the post of Senior CT

D. That appellant would like to seek the permission of this Hon'ble Tribunal to advance further grounds at the time of hearing.

Prayer:-

On acceptance of this service appeal, this Hon'ble Court may graciously be pleased to

1. To Declare that the appellant was entitle for promotion to the post of CT w.e.f 20.02.2015 and to the post of Senior CT BPS-16 w.e.f 30.12.2020, when his juniors colleagues i.e respondents No 4 to 7 etc were promoted to the post CT and Senior CT.
2. Direct the respondents to promote the Appellant to the post of CT not with immediate effect i.e 26.05.2021 but w.e.f 20.02.2015 and to the post of Senior CT BPS-16 w.e.f 30.12.2020 i.e the date when Juniors Colleagues were promoted.
3. Any other relief which this Honorable Court deems appropriate but not specifically asked for may also be granted.

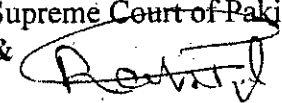


Appellant

Through

Dated: 16.03.2023

ASHRAF ALI KHATTAK
Advocate,
Supreme Court of Pakistan

& 
RAHID ULLAH WAZIR
Advocate, Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____/2023

Mr. Hawas Khan
 CT, Govt High School Jatta Ismail Khel
 Tehsil Bidi Shah District Karak


.....Appellant.

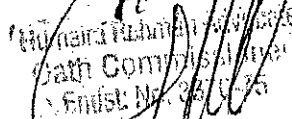
Versus.

The Secretary Education E&SE
 Civil Secretariat, Peshawar & others.....Respondents.

AFFIDAVIT

I, Mr. Hawas Khan CT, Govt High School Jatta Ismail Khel Tehsil Bidi Shah District Karak, do hereby solemnly affirm and declare on oath that the contents of this Service Appeal are correct to best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.


 Deponent.


 Oath Commission
 Peshawar
 Enst. No. 25/1975

17/3/2023

A

7

(5)


OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KARAK

PROMOTION

Consequent upon the recommendation of the District Promotion Committee, in the light of the Govt. of KPK E&SE Peshawar No 2412-2562/ Promotion /Estab: dated 18/01/2013, following SPSTs B-14 are hereby promoted to the post of PSHTs B-15 on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with immediate effect and further posted in the schools noted against each:-

S.NO	Name, Desig:&School	School where Posted / U.C	Seniority NO.	Remarks.
1	Nasim Iqbal SPST GPS Shahidan Banda	GPS Aral Tor Adam/Latamber	562	
2	Muhammad Zahoor SPST GPS Munawar Jan Korogna	GPS Faqir Abad /Mitha Khel	567	
3	Umar Hayat SPST GPS Tapi Kanda	GPS Shanki Banda/ Sabir Abad	613	
4	Muhammad Jamil SPST GPS Rehmat Abad	GPS Gurguri Eidal Khel/Sabir Abad	614	
5	Ghulam Qadir Khan SPST GPS Nusrat Abad	GPS Showanki Data Mines	615	
6	Fahim ullah SPST GPS Rangeen Abad	GPS Andaki/Palosa Sar	616	
7	Ihtisham Aziz SPST GPS Urmarr	GPS Sherki/Teri	620	
8	Momin Gul SPST GPS Makoori No.1	GPS Makoori No.1/ J.I. Khel	622	
9	Fawaz Bahim SPST GPS Abdul Hayat Banda	GPS Kohi Maidan/ S.G. Khel	623	
10	Ihsan ul Haq SPST GPS Algadi Gharbi	GPS Mir. Kalam/ J.I. Khel	625	
11	Muhammad Ishtiaq SPST GPS Dabb Sangini	GPS Shaikhan Mami Khel/J.I. Khel	627	
12	Ajab Khan SPST GPS Dabb	GPS Landoki/Teri	628	
13	Khurshid Anjum SPST GPS Latamber -2	GPS Ghundaki/Teri	629	
14	Khawas Khan SPST GPS Hoti Banda	GPS Darga Shahidan / Bahadar Khel	632	
15	Nasir Mehmood SPST GPS Tor Diland	GPS Esak Khumari/ Teri	634	
16	Aziz ul Wahab SPST GPS Municipal Committee, Karak	GPS Gandhi Sada Gul / Teri	635	
17	Muhammad Raziq SPST GPS Haji Banda	GPS Malati Killa/ W.A. Abad	636	
18	Muhammad Naeem SPST GPS Faten Sheri	GPS Gurguri Gharbi / Gurguri	637	
19	Muhammad Fiaz SPST GPS Dabb Begu Khel	GPS Dalan Shaikhan/ Gurguri	638	

P.T.O



ATTESTED

Terms and conditions:-

1. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
2. Charge report should be submitted to all concerned immediately.
3. Their inter-S. - seniority on lower post will remain intact.
4. They will be bound to comply with the promotion order within 15 days otherwise the order will stand in effective.
5. SDEOs are directed that if anyone forego promotion, necessary entry to this effect made in his service book.
6. No TA/DA is allowed.

3/1

DISTRICT EDUCATION OFFICER
(MALE) KARAK

Endst: No. 469-58

Dated Karak the 31 / 12 / 2014

Copy for record for information and necessary action to the:-

1. District Accounts Officer Karak.
2. Sub Divisional Education Officer (Male) Primary in District Karak.
3. Head Teacher G.P.S. Cyber Takhtunkhwa, Peshawar.
4. M.P.S.

31/12/14

DISTRICT EDUCATION OFFICER
(MALE) KARAK

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (M) BANDA DAUD SHAH (KK).

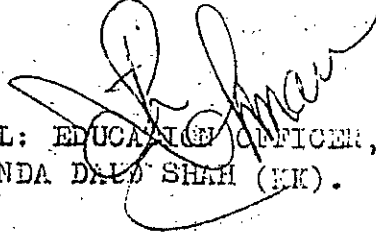
Endst: No. 191-941

Dated B.D. Shah the 01-01- / 2015.

Copy to the:-

1. District Education Officer (M) Karak.
2. District Accounts Officer Karak.
3. A.S.D.E.O (M) Circle Ahmadi Banda/ Circle Khurram.
4. Head Teacher G.P.S.

1



SUB DIVISIONAL EDUCATION OFFICER,
(MALE) BANDA DAUD SHAH (KK).

Promotion:-

Consistent upon the approval of the District recruitment/selection/promotion committee the following PSHTs, SPSTs are here by promoted to the post of (CTPS 15) @ Rs. 8500-700-29500 plus usual allowances as due and admissible to them under the prescribed rules / quota (40% open merit and 60% quota) on regular bases with effect from the date of their taking over charge.

S.No.	Name, Desig. & School	School where posted	Senior's Y No.	Remark
1	Eid Marjan PSHT, GPS G. Shahbaz Khan	GMS Nari Eida Ikhel	33	Against V/post
2	Matt ur Rehman PSHT, GPS Sarwan Banda	GMS Arul Adam	213	-do-
3	Muhamamd Mustafa PSHT, GPS	GISS Iqbal Panose	331	-do-
4	Mahmood khel			-do-
4	Ihsan Ullah PSHT, GPS Shahidan	GMS Cianda Manzai	529	-do-
5	Jamal Abdul Nasir PSHT, GPS Dell Milla	GMS Charpara	545	-do-
6	Javeed Akhtar PSHT, GPS Jan Alankoroma	GMS Charpara	555	-do-
7	Alsarzaman PSHT, GPS Zarkinasrall	GMS Charpara	598	-do-
8	Muhamamd Ali Johar SPST, GPS Teri	GHS Teri	672	-do-
9	Hayat Muhamamd SPST, GPS Awazi	GHS Ahmad khel	676	-do-
10	Zafar Ali Khan SPST, GPS Palosa Sir	GMS Wailaha	681	-do-
11	Pasbilah SPST, GPS Daraki	GMS Wally Banda Dhora	708	-do-
12	Muhamamd Afrikhan SPST, GPS		724	-do-
13	Malak Ayez SPST, GPS Takhi-c	GMS Faraki	717	-do-
14	Nasrallah		721	-do-
15	Avant Zahir SPST, GPS Dabir	GMS Wally Banda Dhora	722	-do-
16	Amir Zahir SPST, GPS Dabir	GMS Wally Banda Dhora	724	-do-
17	Noor Jamal SPST, GPS Teri	GMS Shari Teri	743	-do-
18	Umar Farooq SPST, GPS Teri	GMS Kordit	748	-do-
19	Fazlillah Khan SPST, GPS Teri	GMS Gorkhilla	749	-do-
20	Noor Muhamamd SPST, GPS Teri	GMS Wally Banda Dhora	750	-do-
21	Akhtar Nawaz SPST, GPS Teri	GMS Wally Banda Dhora	751	-do-
22	Hazra Ali SPST, GPS Teri	GMS Wally Banda Dhora	766	-do-
23	Muhamamd Iqbal SPST, GPS Teri	GMS Wally Banda Dhora	770	-do-
24	Muhamamd Farig SPST, GPS Shahida	GMS Wally Banda Dhora	772	-do-

8

Terms & conditions:

1. No TA/DA is allowed.
2. Charge report should be submitted to all concerned.
3. They will be bound to comply with the promotion order within 15 days.
4. S.D.O.s are directed that if any one forego promotion, necessary entry to this effect may be made in his service book.

DISTRICT EDUCATION OFFICER
(MALE) KARAK

Endst NO.

652-58

Dated Karak the

20/2/2015

Copy forwarded for information and necessary action to the:-

1. District Account Officer Karak.
2. Sub-Divisional Education Officer (Male) Primary Karak, B.D. Shah & Takht-e-Nasrati.
3. All Principals/Headmasters of the concerned Schools.
4. PA to the Director E&SE, Yaber, Pakhtunkhwa Peshawar.
5. M/file.

ATTESTED

DISTRICT EDUCATION OFFICER
(MALE) KARAK

[Handwritten Signature]

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2/10

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the November 13, 2012.

No. SO/PE/1-SS/SC/Meeting/2012/Teaching Cadre- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Service (Appointment, Promotion and Transfer) Rules, 1959 and in supersession of all Notifications issued in this behalf, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby lays down the method of recruitment of teachers and other conditions specified in the Appendix to this Notification which shall be applicable to all the posts specified in Column No. 2 of the said Appendix and the schedule therewith.

SECRETARY TO GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

Encl. No. & Date as above

Copy forwarded to:-

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Law Department
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General, Khyber Pakhtunkhwa Peshawar.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. The Director Education (FA/TA), Peshawar.

ATTESTED

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8. The Director Curriculum & Teachers Education Abbottabad.
9. The Director (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
11. The Deputy Director Database (EMIS) E&SE Department.
12. All District Coordination Officers in Khyber Pakhtunkhwa.
13. All Executive District Officers Elementary & Secondary Education in Khyber Pakhtunkhwa.
14. All District Accounts Officers in Khyber Pakhtunkhwa / Agency Accounts Officers FATA.
15. All Agency Education Officers FATA.
16. P.S to Governor, Khyber Pakhtunkhwa.
17. P.S to Chief Minister, Khyber Pakhtunkhwa.
18. P.S to Chief Secretary, Khyber Pakhtunkhwa.
19. P.S to Minister E&SE, Khyber Pakhtunkhwa Peshawar.
20. P.S to Secretary E&SE Department.
21. Master File.


Section Officer (Primary)

ATTESTED

APPENDIX

S.No. of the post	Nomenclature of the post	Minimum qualification and experience for initial appointment or by transfer.	Age limit	Method of recruitment.
1	<p>Secondary School Teacher (BPS-16) in subjects: Statistics, Humanities and other equivalent groups recognized by the Ministry of Education, Government of Punjab.</p>	<p>(i) Second class Bachelor's Degree with two subjects as Chemistry, Botany, Zoology, Physics, Mathematics, Statistics, Humanities and other equivalent groups from a recognized University; or Certified Teachers</p> <p>(ii) M.A. in Education or Bachelor's Degree in Education, from a recognized University.</p>	<p>18 to 35 years.</p>	<p>(a) Fifty percent by promotion on the basis of seniority-cum-fitness, in the following manner:</p> <p>(i) forty per cent from amongst the Certified Teachers (General), Certified Teachers (Agriculture), Certified Teachers (Industrial Arts) and Certified Teachers (Home Economics) with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(ii) four per cent from amongst the Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(iii) four per cent from amongst the Physical Education Teachers with at least five years service as such and having qualification mentioned in column No. 3;</p>

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<p>14. Category: Certified Teacher (Industrial Arts) from Govt. Technical Institute of Center of</p>	<p>(i) Bachelor's Degree from a recognized University with two years training in the relevant technical subjects from any Government Industrial or Govt. Technical Vocational Institute or Center of</p>	<p>18 to 35 years.</p>	<p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General). Provided that if no suitable candidate is available amongst the Primary School Head Teachers for promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five year service and having qualification prescribed for initial recruitment of Certified Teacher (General).</p> <p>(a) Forty per cent by initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher</p>
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	<p>any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Agriculture).</p>	<p>years Education ment of suitable by initial</p>	<p>promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture).</p> <p>Note: In case of non availability of suitable person for promotion, then by initial recruitment.</p>
<p>16. Certified Teacher (Home Economics) from a recognized University with in service training from Government Agro Technical Teacher Training Center, or</p>	<p>(i) Bachelor's Degree with Home Economics, as one of the subject, from a recognized University with in service training from Government Agro Technical Teacher Training Center, or (ii) Certified Teacher Certificate with Home Economics, as one of the subjects, from any Government Training school or college with Bachelor's Degree, or (iii) Bachelor's Degree from a recognized University with nine months training from Government Agro Technical Teacher Training Center of the level of the Certified Teacher Agro Technical (Home Economics); or (iv) Bachelor's Degree from a recognized</p>	<p>18 to 35 years</p>	<p>(a) Forty per cent by initial recruitment; and (b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service as such and having qualification prescribed for initial recruitment of Certified Teacher (Home Economics);</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment o</p>

ATTESTED



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

Address: KDA Karak

PROMOTION ORDER

In pursuance to the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Notification issued vide Endst No.2945-50/File No.1/Promotion SCT(BPS-16) Dated Peshawar the 08/12/2020, the following CT are promoted to the post of Sr.CT in BPS-16(18910-1520-64510) respectively plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government on the terms & Conditions given below and they are hereby posted against the posts in the schools mentioned below with immediate effect.

S. No	Sen: No.	Name of Teacher	Name of School	Date of Birth	Place of Posting
1.	90	Noor Khan	GMS Odin Shah	4/2/1968	GHS Ganderi Khattak
2.	100	Khalil Ur Rehman	GMS Odin Shah	1/4/1967	GHS Kiri Dhand
3.	179	Mati Ur Rehman	GHS Garang Siraj Khel	12/4/1965	GHS Garang Siraj Khel
4.	180	Muhammad Mustafa	GHSS Nari Panoos	6/10/1963	GHSS Nari Panoos
5.	181	Jamal Abdul Nasir	GHS Ghundi Kalla	4/2/1967	GHS Ghundi Kalla
6.	182	Afsar Zaman	GMS Khada Banda	2/3/1971	GHSS Bogara
7.	183	Muhammad Ali Johar	GHS Teri	5/11/1969	GHS Teri
8.	184	Hayat Muhammad	GMS Mianki Banda	1/7/1971	GCMHS Chokara
9.	185	Zafar Ali Khan	GMS Walay Banda	3/3/1971	GHS Ghunda Shamsbaki
10.	186	Fazhullah	GHS Lawaghar Chani Khel	27/4/1972	GHSS Kando Khel
11.	187	Muhammad Arif Khan	GMS Zibi Chani Khel	1/4/1974	GHS Tarki Khel
12.	188	Aurangzeb	GHS Dabb	3/3/1972	GHS Miha Khel
13.	190	Umar Farooq	GHS Manzini	2/5/1969	GHS Manzini
14.	191	Faiz Ullah	GHS GMK Khel	1/1/1970	GHSS Jandri
15.	192	Akhtar Nawaz	GMS Latamber	1/4/1971	GHS Latamber
16.	193	Hazrat Ali Khan	GHS Tatter Khel	9/8/1969	GCMHS Chokara
17.	194	Muhammad Iqbal Shah	GMS Shanki Banda	1/2/1971	GHS Tarki Khel
18.	195	Muhammad Tariq	GHS Teri	21/11/1971	GHS Hayat Abad
19.	196	Shams-Ud-Doha	GHSS Karak	1/4/1973	GHSS Karak
20.	197	Muhammad Shah Faz	GHS Sarki Lawaghar	6/3/1969	GHS Sarki Lawaghar
21.	198	Aznan Ullah	GHS Degar Nari	20/12/1970	GHS Degar Nari
22.	199	Falak Naz	GMS Barbara	11/8/1974	GHS Ahmadli Banda
23.	200	Ihsan Ul Haq	GMS Tabi Khwa	4/5/1972	GHS Tarkha Koic
24.	201	Habib Ullah	GHS Khojeki Kalla	4/4/1975	GHS Gardi Banda
25.	202	Inam Ullah	GHS Miha Khel	1/1/1970	GHS Miha Khel

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S. No.	Sen: No.	Name of Teacher	Name of School	Date of Birth	Place of Posting
26.	203	Nasir Mehmood	GMS Ashkari Ali Khel	1/9/1973	GHS Deli Mela
27.	204	Mumtaz Ali	GHS Palosa Kimanri	6/4/1975	GHS Palosa Kimanri
28.	205	Shaukat Ali Khan	GHS GMK Khel	1/4/1972	GHS Dabb Sangini
29.	206	Syed Rehman	GHS Sabir Abad	15/5/1970	GHS Sabir Abad
30.	207	Abdul Qayum Khan	GMS Zibi Chani Khel	15/12/1972	GHS Tarki Khel
31.	208	Muhammad Ismail	GHS Rehmat Abad	12/3/1968	GHS Rehmat Abad
32.	209	Malak Ayaz Khan	GHS Zarki Nasrati	1/1/1968	GHS Zarki Nasrati
33.	210	Muhammad Bizad Khan	GHS Dagar Nari	6/7/1968	GHSS Nari Panoos
34.	211	Muzaffar Ul Haq	GHS Teri	17/9/1970	GHS Makoori
35.	212	Muhammad Aslam Khan	GHS Deli Mela	10/7/1974	GHS Deli Mela
36.	213	Abdul Haleem	GHS Sabir Abad	1/1/1973	GHSS Jandri
37.	214	Gul Sahib Khan	GHS Dhand Edal Khel	15/3/1969	GHS Dhand Edal Khel
38.	215	Wahid Ullah	GHS Tor Dhand	17/9/1969	GHS Tor Dhand
39.	216	Muhammad Naseem Ullah	GHS Dabb	6/8/1970	GHS Dabb
40.	218	Khurshid Alam	GYISHS Ahmad Abad	1/9/1971	GYISHS Ahmad Abad
41.	219	Nawab Ali Khan	GHS Esaf Khel	10/3/1973	GHS Esaf Khel
42.	220	Zia Ud Din	GHS Totaki	15/3/1973	GHS Totaki

CONSEQUENTIAL ADJUSTMENT

S.No	Name & Designation	Present Station	Place of Posting	Remarks
i.	Zahir Ud Din, CT	GHSS Bogara	GMS Khada Banda	Vice S.No.6
ii.	Noor Ghani Shah, CT	GHS Tarki Khel	GMS Zibi Chani Khel	Vice S.No.11
iii.	Hafeez Ullah Khan, CT	GHSS Jandri	GHS GMK Khel	Vice S.No.14
iv.	Abdul Hameed Khan, CT	GHS Tarki Khel	GMS Shanki Banda	Vice S.No.17
v.	Azmat Ali Khan, CT	GHS Tarkha Koic	GMS Tabi Khwa	Vice S.No.23
vi.	Asad Faraz, CT	GHS Dabb Sangini	GHS GMK Khel	Vice S.No.28
vii.	Muhammad Ijaz Khan, CT	GHSS Jandri	GHS Sabir Abad	Vice S.No.36

Terms & Conditions:

1. No T/DA is allowed for joining their duty.
2. Charge report should be submitted to all concerned.
3. They will be on probation for a period of one year extendable for next one year.
4. They will be governed by such rules & regulations as may be issued from time to time by the Government.
5. Their services can be terminated any time; in case their performance is found unsatisfactory during probation period.
6. Their inter-seniority on lower post will remain intact.

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They will give an undertaking to be recorded in their service books to the effect that if any overpayment made to them in the light of this order, will be recovered and if they are wrong, promoted will be reversed.

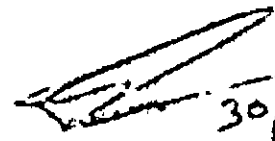
(SHERAZ AHMAD)
DISTRICT EDUCATION OFFICER
(MALE) KARAK

Dated Karak the 30/12 2020

Encl: No. 4559-63 Promotion/SC1.

Copy to the:

- 1. Director Elementary & Secondary Education (Hyber Pakhtunkhwa) Peshawar
- 2. District Accounts Officer Karak.
- 3. District Monitoring Officer (IMU) Karak.
- 4. Principals/Head Masters of concerned schools.
- 5. Budget & Accounts Officer Local Office.


30/12/2020

DISTRICT EDUCATION OFFICER
(MALE) KARAK

Handwritten notes:
Sheraz Ahmad
30/12/2020





Promotion Order

Consequent upon the approval of the District Promotion Committee, the following PSTs/SPSTs/PSHTs, are here by promoted to the post of CT (BPS 15) @ RS (16120-1330-56020) Per Month plus usual allowances as due and admissible to them under the prescribed rules / quota (40 % open merit and 60 % seniority - com - fitness) on regular basis with effect from the date of their taking over charge on the terms and conditions as mentioned below.

S.No	Sen: No	Name of Teacher	Father Name	Desig	School where working	School where posted	Remarks
1	19	Jamal Sadiq	Gul Shah Deen	PSHT	GPS Hayat Ullah Korona	GHS Zarki Nasrati	A.V. Post
2	36	M.Munir Khan	M.Naseer Khan	PSHT	GPS S.G. Khel	GMS Shanawa Gudi Khel	A.V. Post
3	38	Zia ur Rehman	Gul Mani Khan	PSHT	GPS Saikot	GHS Ahmad Abad	A.V. Post
4	48	Muhammad Subhan	Naura Din	PSHT	GPS Gul Rauf Korona	GHS Tatter Khel	A.V. Post
5	52	Gul Niaz	Khan Bad Shah	PSHT	GPS Bogara No.2	GHS Khojaki Killa	A.V. Post
6	101	Noor Aslam Khan	Muhammad Aslam Khan	PSHT	GPS Shobli Banda	GHS Rehmat Abad	A.V. Post
7	135	Zahid Iqbal	Rahmat Shah	PSHT	GPS Saif Ali Banda	GHS Town Committee	A.V. Post
8	156	Ihsan ullah	Sulaiman Shah	PSHT	GPS Shaheedan Chountra	GMS Sabir Abad	A.V. Post
9	161	Muhammad Zaman	Gul Shah zada	PSHT	GPS Karak Sharki	GMS Karak City	A.V. Post
10	165	Maqbool Iqbal	Rehman Noor	PSHT	GPS Kanda Balanzeen	GMS Official Colony	A.V. Post
11	167	Atiq ur Rehman	Ali Abas Khan	PSHT	GPS Yousaf Khel	GHS Ghundi Killa	A.V. Post
12	191	Fazal Rabi	Feroz Khan	PSHT	GPS Dabli Lawagher No.1	GHS Takht-e-Nasrati	A.V. Post
13	195	Abdul Wahab	Shoba Jan	PSHT	GPS Faqir Abad	GMS Latamber	A.V. Post
14	213	Hawas-Khan	Shahid Gul	PSHT	GPS Mansoor Ghar	GHS Jatta Ismail Khel	A.V. Post
15	218	Mukhtiar Gul	Hassan Badshah	PSHT	GPS Shawa Hindu Kush	GHS Deli Mela	A.V. Post
16	234	Tasleem Ur Rahman	Khukam Badshah	PSHT	GPS Sarwan Banda	GMS Inzer Payan	A.V. Post
17	241	Muhammad Khurshid	Nazir Azam	PSHT	GPS Shagi Lawagher #2	GHS Soordag	A.V. Post
18	242	Muhammad Ishaque	Lal Bat Khan	PSHT	GPS Noora Kalla	GMS Ashkari Ali Khel	A.V. Post
19	245	Abdul Majid	Abdul Qadeem	PSHT	GPS Chanda Khurram	GMS Ashkari Ali Khel	A.V. Post
20	247	Noor Alam Khan	Gul Haidar	PSHT	GPS Amberi Killa	GHSS Warana	A.V. Post
21	266	Khitab Gul	Speen Gul	PSHT	GPS Janda Khel	GMS Zebi Chani Khel	A.V. Post
22	284	Sajid Salim	Wahib Gul	PSHT	GPS Tehran Kot	GHS Nari Panoos	A.V. Post
23	298	Jamil ur Rehman	Saif ur Rehman	PSHT	GPS Sharbat Korona	GHS Manzini	A.V. Post
24	306	Zia Ullah	Muhammad Sharif	PSHT	GPS Sada Gul Banda	GHS Makoori	A.V. Post
25	313	Nasrullah Khan	Kareem Gul	PSHT	GPS Bakha	GHSS Warana	A.V. Post
26	320	Masood Ahmad	Raban Gul	PSHT	GPS Kiri Dhand	GMS Alam Sheri	A.N.C. Post
27	326	Mahboob Ali Khan	Bunir Gul	SPST	GPS Official Colony Karak	GMS Aral Adam Banda	A.V. Post

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30	376	Zahoor Islam	Muhammad Nazif	PSHT	GPS Hesar Banda	GHS Teri	A.V. Post
31	402	Qamar Zaman	Sub Khan	SPST		GHSS Bahader Khel	A.V. Post
	419	Zahid ullah	Muhammad Ghulam	PSHT	GPS Mandawa	GMS Warana Mir Hassan Khel	A.V. Post
32	429	Anwar Ali		PSHT	GPS Alwarghee Banda	GHS Jatta Ismail Khel	A.V. Post
33	436	Mohd: Sarwar	Nikam Khan	PSHT	GPS Shobli Banda	GMS Odin Shah	A.V. Post
34	454	Junaid Ahmad Khan	Sarfaz Khan	PSHT	GPS Otash Banda	GMS Alam Sheri	A.N.C. Post
35	471	Ashgar Khan	Abdul Kabir Khan	PSHT	GPS Sherkie	GHS Teri	A.V. Post
36	477	Imtiaz Khan	Mast Ali Khan	PSHT	GPS Nusrat Abad	GMS Odin Shah	A.V. Post
37	479	Adnan Ahmad	Said Badshah	PSHT	GPS Makori No.1	GMS Inzer Payan	A.V. Post
38	481	Nasir Mahmood	Sultan Gul	PSHT	GPS Darangi	GHS Khurram	A.V. Post
39	483	Muhammad Ayub	Fiaz Rehman	PSHT	GPS Dailan Sheikhan	GHS Dagar Nari	A.V. Post
			Amal Khan	PSHT	GPS Bami	GHS Gurguri	A.V. Post

TERMS AND CONDITIONS

1. They would be on Probation for a Period of one year extendable for another one year.
2. They will be Governed by such rules and regulation as may be issued from time to time by the Govt:
3. Their Services can be terminated at any time; in case his performance is found un Satisfactory during probationary period. In case of miss conduct, he shall be Preceded under the rules framed from time to time.
4. Charge Report should be submitted to all concerned.
5. Their Inter-Se-Seniority on lower post will remain intact.
6. No TA/DA etc is allowed for joining his duty.
7. They will give in under taking to be recorded in their Service Book to the effect that if any over payment is made to him in light of this order will be recovered and if he is wrongly Promoted he will be reversed.

DISTRICT EDUCATION OFFICER
(MALE)KARAK

Endst NO: 2052-60 /PST Promotion to CT Dated Karak the 26/05/2021

Copy forwarded for information and necessary action to the:-

1. District Account Officer Karak.
2. Sub Divisional Education Officer (Male) Primary karak, B D Shah & Takht-e-Nasrati with the direction to relieve all the promoted teachers immediately. In case of any refusal their services will be transferred to any vacant post in the district.
3. All Principals/Headmaster concerned.
4. PA to the Director E & SE Education Khyber Pakhtunkhwa Peshawar.
5. DMO Karak.
6. Official concerned.
7. Master file.

DISTRICT EDUCATION OFFICER
(MALE)KARAK

ATTESTED

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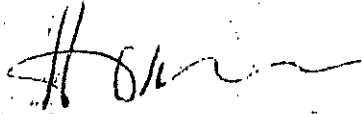
To
The Director,
(E&SE) Department,
Khyber Pakhunkhwa, Peshawar.

Subject: DEPARTMENTAL APPEAL FOR PROMOTION FROM THE POST OF PST TO THE
POST OF CT BPS-15 W.E.F. DATE 20.02.2015

Respected Sir,

With great reverence it is stated that I Mr. Hawas Khan was serving against the post of PSHT BPS-15 at GPS Shakir khel. All my colleagues & junior colleagues (PST) were promoted to the post of CT BPS-15 on notification No.652-56 dated 20.02.2015. I was placed at seniority No-632 in the seniority list of PST. I have badly affected due to non promotion to post of CT at that time, while seniority No.33 to 774 has been promoted and I was left from the promotion at seniority No.632 which is my right violation. I have promoted to the post of CT BPS-15 vide notification No.2052-60 dated 26.05.2021 and serving at GHS Jatta Ismail Khel Karak.

Your good honour is requested to consider my appeal for promotion w.e.f.20.02.2015 with all benefits. Furthermore my colleagues and junior colleagues have been promoted to the post of Senior CT (BPS-16) Notification No.4559-63 dated 30.12.2020. kindly grant me promotion to the post of senior CT BPS-16 w.e.f dated 30.12.2020 with all benefits. I shall remain very thankful to you for your this act of Kindness.


Your's obediently

HAWAS KHAN CT

GHS JATTA ISMAIL KHEL KARAK


ATTESTED

IN THE COURT OF KHYBER PAKHTUNKHWA

Service Tribunal Rawal

Mr. Hameed Khan Appellant(s)/Petitioner(s)

VERSUS

The Secretary Education

E & SE Civil Secretariat Respondent(s)

I/We Mr. Hameed Khan do hereby appoint Mr. Ashraf Ali Khattak Advocate Supreme Court of Pakistan in the above mentioned case, to do all or any of the following acts, deeds and things.

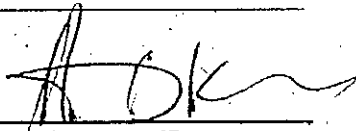
1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard and any other proceedings arising out of or connected therewith.
2. To sign, verify and file or withdraw all proceedings, petitions, appeals, affidavits and applications for compromise or withdrawal or for submission to arbitration of the said case, or any other documents, as may be deemed necessary or advisable by them for the conduct, prosecution or defence of the said case at all its stages.
3. To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of proceedings.

AND hereby agree:-

- a. That the Advocate(s) shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fee remains unpaid.

In witness whereof I/We have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this _____

Attested & Accepted by


Signature of Executants


Ashraf Ali Khattak
Advocate,
Supreme Court of Pakistan

B/C 051046
0332-9951676