

FORM OF ORDER SHEET

Court of

Appeal No. 1685/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/08/2023	The appeal of Mr. Naseeb Rehman is re-submitted today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>24-08-2023</u>
		By the order of Chairman  REGISTRAR

Order

04.07.2023

The reply of the learned
Counsel is not convincing. And the (24)
appellants shall comply with the
provisions of Sec 4 of the KPST Act, 1974
& all other rules. The learned
Counsel shall not insist on placement
of appeals, considering the irrelevant
letter to be an appellate order.
The office shall entertain appeal
only if the appellate order
is produced or on maturity

NO: 1860/ST

Dated: 04-07-2023

04/7/23

Sir
The Departmental appeal of the appellant is
rejected vide appellate order dt. 9⁸ and
the same is placed on file. (P. 17/8. 23)
Therefore please
the appeal be placed before the Bench
along with (23) Appeals.
Resubmission - 15/8/2023

The appeal of Mr. Naseeb Rehman CT GMS Babra Lakki Orakzai received today i.e. on 06.06.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of departmental appeal in respect of appellant is not attached with the appeal which be placed on it.
- 2- Copy of proper rejection order of departmental appeal is not attached with the appeal which be placed on it.

No. 1639 /S.T,

Dt. 9/6 /2023.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

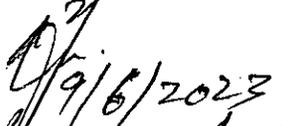
Noor Muhammad Khattak Adv.
High Court Peshawar.

Note:-

Sir,

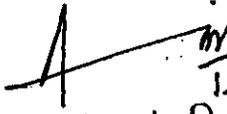
The Departmental appeal of the appellant is already annexed with the appeal i.e. at page no. 17. So far as the rejection/apellate order is concerned the same has been ^{not} issued to the appellant as a separate order rather the same has been issued/written on the face of Departmental appeal which is available at annexure - F, page 17.

In light of the above the instant appeal may kindly be placed before the Honourable Bench (SB) for consideration/decision.


9/6/2023
Noor Muhammad Khattak


Sir,

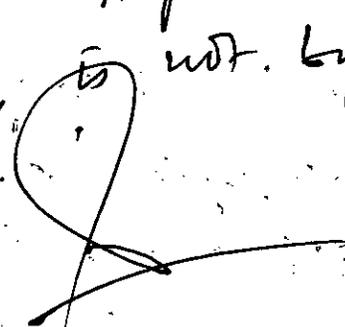
The objection no. 2 of this office still stands. The reply of the learned counsel for appellant is submitted for appropriate order, please.


12/6/23
Assistant Registrar

Hon'ble/Chairman

Be returned as the order written on the face of departmental appeal Annex - F/P-17, referred to by the learned counsel, in the reply to objection raised by the office, is not by the appellate authority.

All connected appeals be returned



12/06/23

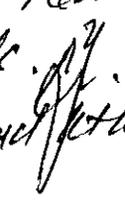

12/06/23

D.No. 1731/4T

Dated: 12/6/23

Note:-

Sir, as the appellate ^{order} has been issued to the appellant vide dated 13.6.2023, therefore the instant appeal may kindly be placed before the SB for preliminary hearing along with other connected appeals.

at Page 16/A
NOR Make - 
ASC

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1685 /2023

NASEEB REHMAN

V/S

EDUCATION DEPTT:

INDEX

S. NO.	DOCUMENTS	ANNEXURE	PAGE
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3.	Copies of the minutes of the DPC dated 14.10.2020 and notification dated 10.12.2020	A & B	5-10
4.	Copy of the educational testimonials	C	11-13
5.	Copies of the letters	D	14-15
6.	Copy of the office order dated 19.05.2023	E	16
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APPELLANT

Through:

NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

1-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 1685 /2023

Mr. Naseeb Rehman, CT (BPS-15),
GMS Babra Laaki, District Orakzai.

..... **APPELLANT**

VERSUS

- 1- The Secretary Elementary & Secondary Education Department,
Khyber Pakhtunkhwa, Peshawar.
- 2- The Director Elementary & Secondary Education, Khyber
Pakhtunkhwa, Peshawar.
- 3- District Education Officer, District Orakzai.

..... **RESPONDENTS**

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED
ORDER DATED 19.05.2023 WHEREBY THE PROMOTION
ORDER DATED 10.12.2020 OF THE APPELLANT HAS BEEN
WITHDRAWN AND AGAINST THE APPELLATE ORDER DATED
09.08.2023 WHEREBY THE DEPARTMENTAL APPEAL OF THE
APPELLANT HAS BEEN REGRETTEED ON NO GOOD GROUNDS.**

PRAYER:

**That on acceptance of this appeal the impugned order dated
19.05.2023, and the Appellate order 09.08.2023 may very
kindly be set aside and the promotion order dated 10.12.2020
be restored with all back benefits. Any other remedy which
this august Tribunal deems fit that may also be awarded in
favor of the appellant.**

R/SHWETH:

ON FACTS:

1. That appellant was an employee of the respondent Department and
performing his duty with full zeal & zest and up to the entire
satisfaction of his high ups.
2. That the appellant being qualified was appointed as PST on
23.11.2009, in the respondent department and since then they are
working with the full zeal and zest.
3. That it is pertinent to mention here that 60 number of posts of CT
(BPS-15) were laying vacant in the District Orakzai. That a DPC was
held to fill up the subject posts and amongst these posts 36 number
of posts were allocated to the quota of PST/PSHT/SPST. That a DPC
meeting was held on 14.10.2020 wherein the appellant was

recommended for the post of CT (BPS-15) and vide notification dated 10.12.2020 the appellant was promoted to the post of CT (BPS-15). Copies of the minutes of the DPC dated 14.10.2020 and notification dated 10.12.2020 are attached as annexure**A&B.**

4. That the appellant is a highly qualified person and his field. Copy of the educational testimonials are attached as annexure**C.**
5. That in pursuance to the notification the appellant started performing his duties with devotion and up to the entire satisfaction of his superiors.
6. That vide letter dated 11.04.2023 the respondent No. 3 was asked to withdraw the promotion order dated 10.12.2020, in response to which the respondent No. 3 vide letter dated 09.05.2023 requested the respondent No. 2 for the review of the decision. Copies of the letters are attached as annexure**D.**
7. That astonishingly vide impugned office order dated 19.05.2023 the promotion order dated 10.12.2020 of the appellant was withdrawn in utter violation of the law and rules on the subject. Copy of the office order dated 19.05.2023 is attached as annexure**E.**
8. That the appellant feeling aggrieved from the impugned office order dated 19.05.2023 preferred departmental appeal. Copy of the departmental appeal is attached as annexure**F.**
9. That the departmental appeal was rejected vide appellate order dated 09/08/2023 as note on the departmental appeal with no good reasons.
10. That having no other remedy preferred the instant appeal on the following grounds amongst the others.

GROUND:

- A- That the impugned order dated 19.05.2019 and appellate order dated 09/08/2023 issued by the respondents are against the law, facts, norms of natural justice and materials on the record hence not tenable in the eyes of law.
- B- That the appellant has not been treated in accordance with law and Rules by the respondents on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That no show cause notice has been served upon the appellant before the issuance of the impugned orders.

D- That no right of defense has been provided to the appellant hence he has been condemned unheard thus violated Article-10-A of the constitution of the Islamic Republic of Pakistan, 1973.

E- That under the principle of *Locus Poenitentiae* the respondents are duty bound not to withdraw the promotion order.

F- That no regular inquiry has been conducted in to the matter before the issuance of the impugned orders.

G- That the respondents acted in arbitrary and malafide manner by issuing the impugned orders.

H- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may very graciously be accepted as prayed for, please.

Dated: 31-05-2023

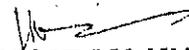


APPELLANT
NASEEB REHMAN

Through:



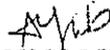
NOOR MOHAMMAD KHATTAK



KAMRAN KHAN



UMAR FAROOQ



MUHAMMAD AYUB



WALEED ADNAN



MAHMOOD JAN

Advocates, Peshawar

AFFIDAVIT

I, Naseeb Rehman, CT (BPS-15), GMS Babra Laaki, District Orakzai, do hereby solemnly affirm and declare on Oath that the contents of this 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.



DEPONENT

-4-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

C.M. NO. _____/2023

IN

APPEAL NO. _____/2023

NASEEB REHMAN

VS

EDUCATION DEPT.

APPLICATION FOR SUSPENSION OF THE OPERATION OF THE
ORDER DATED 19.05.2023 TILL THE DISPOSAL OF THE
MENTIONED APPEAL.

R.SHEWETH:

1. That, the titled appeal is submitted before this Honorable tribunal along with this application in which no date has been fixed yet.
2. That the applicant had filed the titled appeal against order dated 19.05.2023 whereby his promotion from PST to CT notification has been withdrawn.
3. That, all the three ingredients required for grant of stay are in favor of the appellant.
4. That the contents of the appeal may be kindly be considered as part and parcel of the instant application.
5. That, any other ground would be taken at the time of arguments with prior permission of this Honorable Tribunal.

It is therefore, most humbly prayed that on acceptance of this application the impugned order dated 19.05.2023 may very kindly be suspended till the disposal of the instant service appeal.

APPELLANT

THROUGH:


NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT



District Education Office
District Orakzai

No. 3517

Phone 0925-600017 FAX 0925-400017 Date 14/10/2020

"A" - B - 5

MINUTES OF THE MEETING OF DEPARTMENTAL PROMOTION COMMITTEE HELD ON 14-10-2020 AT 10:30 AM

A meeting of the Departmental Promotion Committee was held today on 14-10-2020 at 10:00 AM under the Chairmanship of District Education Officer District Orakzai to discuss the promotion cases of Male PST/SPST/PSHT to CT B-15, in the District Education Office, Orakzai. The following attended the meeting:

- | | |
|--|-------------------------|
| 1. Mr. Fareed Ullah Mehsud, District Education Officer | Chairman |
| 2. Mr. Hameed-Ulhan Jan, Additional Director NMD | (KPE&SD Representative) |
| 3. Mr. Saif Ullah, Principal B-19 GHS Mandali District Orakzai | Member |
| 4. Mr. Muhammad Iqbal, HM GHS Mishli Bazar | Member |
| 5. Kausar Ali, ADEO District Orakzai | Member |
| 6. Mr. Abdul Abdul Malik, ADEO District Orakzai | Member |
| 7. Mst. Nabila Naz, ADEO District Orakzai | Member |
| 8. Mr. Shakeel Ahmed, SST GHS Swaro Kot | Member |
| 9. Mr. Wahid Ullah, SCT GMS Bagara Mishli | Member |

The meeting started with recitation from the Holy Quran. The Chair welcomed the participants. The following items were discussed in detail by the DPC keeping in view all the aspects of the case and finally unanimously recommended the promotion of the following teachers on the vacant post with immediate effect:

Item No. 1 PROMOTION OF PST/SPST/PSHT (MALE) FROM TO CT BPS-15 ON REGULAR BASIS

The case of promotion of PST/SPST/PSHT (MALE) to CT BPS-15 against vacant posts was considered and the DPC recommended as under:

Total No. of CT (M) Vacant Post	60
50% share of PST/SPST/PSHT Posts	36
Share of promotion 100%	36
Net to be Promoted	36
Available for promotion	36
Recommended for promotion to CT	36

S.I. #	Name of teacher	B.P. S.	Date of Birth	Regular Service	Place of Posting	Remarks
1	36 Zeebat Ali	15	05/02/1970	01/03/1993	GPS Noor Ali Garhi	
2	66 Amal Hassan	15	01/08/1970	23/05/1995	GPS Garhi Mami Khel	
3	126 Hussainullah	15	13/03/1972	31/03/2001	GPS Khawas Khel	
4	159 Ali Akbar	15	05/03/1979	01/09/2003	GPS Sarka Ankhel	
5	160 Yasun Ullah	15	02/01/1980	01/09/2003	GPS Sarka Mishri	
6	161 Shah	15	10/05/1982	01/10/2003	GPS Sarka Khel	
7	166 Abid Shakoor	15	01/03/1972	23/10/2003	GPS Sama Mamozai	
8	169 Samar Gul	15	01/01/1979	29/07/2004	GPS Sangra	
9	170 Kh. Ali ur Rehman	15	03/06/1979	03/08/2004	GPS Taropi Ali Khel	
10	178 Muhammad Umar	15	23/04/1976	03/09/2005	GPS Rambic Salai	
11	218 Mir Asghar	15	16/10/1984	05/09/2005	GPS Khairgar Boor	
12	219 Waheed Ullah	15	02/02/1979	23/10/2005	GPS Diland Khel No.2	
13	277 Jabal Hussain	12	05/05/1985	24/11/2009	GPS Ster Sam	
14	278 Khojista Jan Muhammad	12	01/03/1986	24/11/2009	GPS Mir Kalan Khel	
15	279 Yaqub Muhammad	12	09/03/1987	24/11/2009	GPS Malang garhi	
16	280 Haqir Naseeb	12	21/12/1985	24/11/2009	GPS Bada Sheikhani	
17	282 Rehman	12	05/10/1985	24/11/2009	GPS Gul Cheri	
18	283 Gul Karim	12	15/01/1982	03/12/2009	GPS Bilazmyi	
19	284 Feroz Shah Miran	12	01/01/1980	24/11/2009	GPS Bared Khel	
20	285 Rehman	12	29/05/1984	24/11/2009	GPS Jaha Kada	
21	286 Gul Bano	12	03/02/1980	24/11/2009	GPS Karopp Samana	
22	288 Ashraf Ali	12	18/03/1985	24/11/2009	GPS Khair Khushia	
23	289 Mubarek Khan	12	10/01/1984	02/12/2009	GPS Toor Kani	
24	290 Hussain	12	03/05/1985	24/11/2009	GPS Shamer	
25	291 Raza Hussain	12	15/02/1982	24/11/2009	GPS Zakhtan	
26	293 Ismael Hussain	12	20/02/1981	24/11/2009	GPS Palaosi	
27	295 Ghani	12	10/03/1986	24/11/2009	GPS Injwar	
28	298 Ghani Hussain	12	09/04/1985	24/11/2009	GPS Jhal Khel Bala	
29	300 Ghani	12	05/05/1985	25/11/2009	GPS Bopapi Ali Khel	
30	301 Ghani	12	24/01/1986	24/11/2009	GPS Panjam Ali Khel	

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-7-

303	Amir ur Rehman	12	03/10/1982	24/11/2009	GPS Khadizai No.1
304	Muhammad Khan Mansoor Khan	12	02/10/1983	24/11/2009	GPS Swaro Kot GPS Chapper Mishli
306	Muhammad Chani	12	23/10/1982	24/11/2009	
307	Chani	12	26/12/1985	24/11/2009	GPS Kot Ali Khel
308	Painda Khan	12	13/04/1984	25/11/2009	GPS Yusuf Khel
312	Ismail Khan	12	12/05/1986	24/11/2009	GPS Khadizai No.2

No. of PST/SPST/PSHT (Male) to CT cleared for promotion = 36

No. of CT (male) deferred for promotion = NIL

The meeting ended with a vote of thanks to and from the chair.

1. Wahid Ullah
SCT GMS Bagara Mishli
Member

2. Shakeel Ahmad
SST GHS Swaro Kot
Member

3. Mr. Abdul Malik
ADEO Orakzai
Member

4. Kausar Ali
ADEO Orakzai
Member

5. Mrs. Wabila Naz
ADEO Orakzai
Member

6. Muhammad Iqbal (HM)
GHS Mishli Bazar
Member

7. Mr. Rais Khan
ADEO Orakzai
Member

8. Saif Ullah
Principal
GHS Mandail
Member

9. Hameed Ullah Jan
Additional Director NMD
KP F&SD Representative

Mr. Farooq Ullah Mehsud
District Education Officer Orakzai
(Chairman)



District Education Office
District Orakzai

No. 6660-8

Dated 12/12/2020

Phone: 0925-692117 FAX 0925-690017

Notification:

As recommended by the Departmental Promotion Committee during its meeting held on 14/10/2020, vide Minutes No. 3514, the competent authority has been pleased to promote & adjust the following male PST/SPST/PSHT teachers from PST/SPST/PSHT to CT-Post BPS-15 against the vacant post in various schools mentioned against their names in District Orakzai with immediate effect in the interest of public service:

S#	S.L#	Name of teacher	BPS	Date of Birth	Regular Service	Current School	Name of the School where Posted
1	36	Iqbal Ali	15	05/02/1970	01/03/1993	GPS Noor Ali Garhi	GM Mirzai
2	65	Arif Hassan	15	01/08/1970	23/05/1995	GPS Garhi Mani Khel	GHSS Kalaya
3	126	Hassanullah	15	13/02/1972	31/03/2001	GPS Khawas Khel	GM Mirzai
						GPS Sarka Aokhe	GIS Tooli Bagh, Orakzai
4	152	Muhammad	15	05/03/1979	01/09/2003	GPS Sarka Aokhe	
	160	Muhammad Ullah	15	02/01/1980	01/09/2003	GPS Sarka Aokhe	GIS Mishli Bazar
	161	Muhammad Shah	15	10/03/1982	01/10/2003	GPS Sarki Khel	GIS Inzer Palli
	162	Muhammad Akbar	15	01/03/1972	23/10/2003	GPS Sama Momozai	GIS Dron Shikhan
	163	Muhammad Akbar	15	01/01/1979	29/07/2004	GPS Samara	GIS Mishli Bazar
	164	Muhammad Akbar	15	05/06/1979	03/08/2004	GPS Torani Ali Khel	GIS Sarki Khel
	165	Muhammad Akbar	15	22/04/1975	03/09/2005	GPS Rombic Salai	GIS Gulistan
	200	Muhammad Akbar	15	15/10/1984	05/09/2005	GPS Khengar Bazar	GIS Sarki Khel
	201	Muhammad Akbar	15	02/02/1979	21/10/2005	GPS Biland Khel No.2	GIS Biland Khel
	202	Muhammad Akbar	12	05/05/1975	24/11/2009	GPS Star Sam	GIS Star Sam
	203	Muhammad Akbar	12	01/03/1986	24/11/2009	GPS Mir Karam Khel	GIS Casim Khel, Orakzai
	204	Muhammad Akbar	12	07/03/1987	24/11/2009	GPS Malang garhi	GIS Yakha Kandaw
	205	Muhammad Akbar	12	21/12/1982	24/11/2009	GPS Bada Shikhan	GIS Mishli Bazar
	267	Muhammad Akbar	12	05/10/1985	24/11/2009	GPS Gul Cheri	GIS Babero Lari
	283	Muhammad Akbar	12	15/01/1982	03/12/2009	GPS Bilozawi Khel	GIS Sali Feroz Khel
	284	Muhammad Akbar	12	01/01/1980	24/11/2009	GPS Dazed Khel	GIS Mir Mela Shikhan

District Education Officer
Orakzai District, at Hangu

Reguler - 9 - posted

20	285	Asif Ur Rehman	12	20/05/1984	24/11/2009	GPS Jaba Kada	GHS Avi Mela
21	287	Gul Pahlm	12	05/04/1979	24/11/2009	GPS Karapa Samana	GHS Gullistan
22	288	Ashfaq Ali	12	18/03/1985	24/11/2009	GPS Khar Khushla	GMS Khalil Sopy (Khural)
23	289	Maskeen Khar	12	10/04/1984	02/12/2009	GPS Taar Kan	GMS Damber Lasi
24	290	S.Khadim Hussain	12	03/05/1985	24/11/2009	GPS Shamer	GHS And Khel
25	291	Raees Akbar	12	16/02/1982	24/11/2009	GPS Zakhlan	GHS Dhan Sheikhan
26	293	Hussain Asghar	12	10/02/1981	24/11/2009	GPS Palas	GMS Khalil Sopy
27	295	Minawar Khan	12	10/05/1986	24/11/2009	GPS Inawar	GHS Saifal
28	298	Hassan	12	09/10/1987	24/11/2009	GPS And Khel Bala	GMS Zera
29	300	Arif Khan	12	10/02/1985	25/11/2009	GPS Bilapl A Khel	GMS Zanku Khel
30	302	Saib Ullah	12	20/04/1986	24/11/2009	GPS Panjam Ali Khel	GMS Alwarha Mela
31	303	Arif ur Rehman	12	03/10/1982	24/11/2009	GPS Khadizai No.1	GHS Swara Kol
32	304	Hikmat Khan	12	02/10/1983	24/11/2009	GPS Sawarc Kol	GHS Swara Kol
33	305	Minawar Khan	12	25/10/1982	24/11/2009	GPS Chapper Mishli	GMS Babera
34	307	Muhammad Ghan	12	26/02/1985	24/11/2009	GPS Kol Ali Pahal	GMS Damber Lasi
35	308	Painda Khan	12	13/02/1984	25/11/2009	GPS Yusuf Khel	GHS Bagh No.1
36	312	Bradil Khan	12	12/05/1986	24/11/2009	GPS Khadizai No.2	GMS Dana Khula

Terms & Conditions:

1. They would be on probation for a period of one year extendable for further period of one year.
2. They will be governed by such rules & regulations as and when issued from time to time by the govt.
3. Their services can be terminated at any time in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed time to time.
4. Charge report should be submitted to all concerned.
5. There will be seniority on lower post will remain intact.
6. They will be allowed for joining his duty.
7. They will give an undertaking to be recorded in their service book to the effect that if any payment is made to him in light this order will be recovered and if he is promoted he will be reversed.

DISTRICT EDUCATION OFFICER
DISTRICT ORAKZAI

Encl: 666/6? dated: 10/12/2020

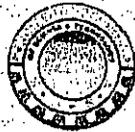
Copy forwarded for information and necessary action to the

Director Education (E&SE) Khyber Pakhtunkhwa Peshawar.

-10-

2. Deputy Commissioner, Orakzai.
3. District Monitoring Officer, Orakzai.
4. District Account Officer District Orakzai.
5. PS to the Secretary to Govt Khyber Pakhtunkhwa & SE Department, Peshawar.
6. PA to the Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. Accountant Local Office, Orakzai.
8. Teacher concerned.
9. Master File.

~~DISTRICT EDUCATION OFFICER~~
DISTRICT ORAKZAI



100-11-

S. No. 021681

KOHAT UNIVERSITY OF SCIENCE & TECHNOLOGY
KOHAT (PAKISTAN)
DETAILED MARKS CERTIFICATE

(8)

Bachelor of Arts (B.A) Part II Annual Examination, 2006

Name: Naseeb Rahman Roll No. 9273
Father's Name: Shahbaz Khan Reg No. 2005-PCKU-964

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

S U B J E C T S	Maximum Marks	M A R K S O B T A I N E D	
		In Figure	In Words
English Compulsory	75	24	Twenty Four
Pashto	75	55	Fifty Five
Islamic Studies	75	54	Fifty Four
Pak Studies	40	13	Thirteen
<i>Part-I Marks</i>	285	153	One Hundred Fifty Three
Total	550	299	Two Hundred Ninety Nine

The examination was taken as a whole

Result declared on 09-Sep-06

Table Errors and omissions are subject to subsequent rectification.

Controller of Examinations
Kohat University of Science and Technology
Kohat, Pakistan.

Serial No. 000328

Roll No. 9273

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Registration No. 2005-FCKU-964

Kohat University of Science & Technology, Kohat (Pakistan)

Session ANNUAL 2006

NASEER RAHMAN

SON of

SHABBAZ KHAN

and a student

of OFAKZAI AGENCY

having passed the prescribed

examination held in JUNE 20 06

is this day admitted by

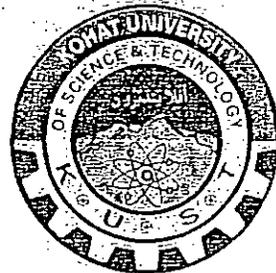
The Kohat University of Science & Technology, Kohat

to the Degree of

Bachelor of Arts

in the SECOND Division

The Examination was taken as a whole / in parts



Result declared on SEPTEMBER 09, 2006.

[Signature]
Controller of Examinations

Countersigned

[Signature]
Vice Chancellor



Certified that *Mr/Ms* **NASEEB RAHMAN**

Son / Daughter of **SHAHBAZ KHAN**

Registration No **05 AOI 0070** *Roll No* **S 620901**

Semester **SPRING 2006** *having met all the requirements*
under the semester system is this day awarded the

Certificate of Teaching

He/She has scored **69 %** *marks*
and has been placed in **B** *grade.*



Result declared on: **March 20, 2007.**

Date of issue **May 02, 2007**

[Signature]

[Signature]
Controller of Examinations



"D" - 14 -

DIRECTORATE OF ELEMENTARY &
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR
P.NO.61/GENERAL TRANSFER

NO. 18811 DATED 11/04/2023

To

✓ The District Education Officer,
Orakzai at Hangu.

Subject: - INTER DISTRICT TRANSFER FROM DISTRICT ORAKZAI
TO DISTRICT HANGU

I am directed to refer to this Office letter No. 14585 Dated 11-01-2023, on the subject cited above and to state that from the perusal of the Promotion Order, Mr. Israfeel Khan S/O Gul Zari Shah PS (BS-12) including 23 others were promoted to the post of CT (BS-15) vide No. 6661-69 Dated 10-12-2020, which is clear cut violation of Service Rules, 2012.

In this regard; I am further directed to ask you to withdraw the Promotion Order of the mentioned CT, including 23 others earlier notified vide Dated 10-12-2020, as well as ^{all} such like cases, if any, and compliance report may be shared with this Office, please.

11/04/2023
Assistant Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa

Post No. _____/

Copy of the above is forwarded to the
1 PA to Director Elementary and Secondary Education Khyber
Pakhtunkhwa.

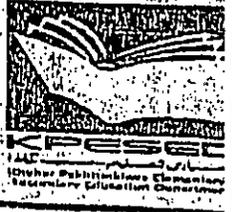
Assistant Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa

Israfeel Khan
11/04/23



OFFICE OF THE DISTRICT EDUCATION OFFICER-(M)-ORAKZAI
DISTRICT HEADQUARTER ORAKZAI AT BABER MELA-HANGU
Phone # 0925-690017 Fax # 0925-690017
Email: deorakzal2020@gmail.com

No. 1344 Dated 09/11/2023



To:

Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Subject: - REQUEST FOR REVIEW/APPRaisal

Reference to the Assistant Director (Estab), Elementary & Secondary Education, Khyber Pakhtunkhwa office letter bearing No. 18811, dated 11/04/2023 wherein it has been directed to withdraw the promotion order of twenty four/24 PSTs BPS: 12 to CT BPS: 15 in District Orakzai issued vide Notification of this office bearing No. 6660, dated 10-12-2020 to the extent of Serial No. 13 to 36, twenty four/24 in counting.

Foregoing in view of the above, the aforesaid twenty four/24 PSTs in BPS: 12 have been promoted to the post of CT BPS: 15 in District Orakzai by adhering the following criteria:

- 1) WHEREAS, the promoted PSTs have been appointed on 24/09/2009 as PST BPS: 12, hence having 11 years of continuous Govt. regular services during promotion in 2020.
- 2) WHEREAS, there are no sanctioned posts of SPST BPS: 14 for promotion of these PSTs.
- 3) WHEREAS, in case of availability of the sanctioned posts of SPST in BPS: 14, these promoted PSTs would have been eligible for promotion to the posts of SPST BPS: 14 prior to this promotion way back in 2014 as per service rules 2012.
- 4) WHEREAS, there was no other eligible willing senior candidate than the promoted PSTs for promotion to the posts of CT BPS-15.
- 5) WHEREAS, 60 posts of CT in BPS: 15 (Male) in district Orakzai were lying vacant at the time of DPC in 2020 and those PSTs in BPS: 12 have been promoted under Service Rules 2012 the 60% share of SPS/PSHT to the posts of CT in BPS: 15.
- 6) WHEREAS, the promoted PSTs had already been served on the posts of CTs in BPS: 15 since 11/12/2020 and one of the promoted PST (Mr. Saqib-ul-Islam) has already obtained the inter district transfer/NOC and serving in District Kohat on the post of CT in BPS: 15.

In the light of above, letter issued by your esteemed office dated: 11/04/2023 may be reviewed in the interest of public service and to avoid any litigation, please.

DISTRICT EDUCATION OFFICER-(M)

ORAKZAI

Copy of Even No. & Date:

Copy forwarded for information and necessary action to the:-

1. Deputy Commissioner, Orakzai.
2. Additional Director (Estab), Directorate of E&SE, MAs, Khyber Pakhtunkhwa, Peshawar.
3. Assistant Director (Estab), Directorate of E&SE, Khyber Pakhtunkhwa w.r.t his office letter vide cited above.
4. Office Copy.

DISTRICT EDUCATION OFFICER-(M)

ORAKZAI



"E" -16-

OFFICE OF THE DISTRICT EDUCATION OFFICER (M)-ORAKZAI
DISTRICT HEADQUARTER ORAKZAI AT BABER MELA HANGU
 Phone # 0925-690017 Fax # 0925-690017
 Email: deoorakzai2020@gmail.com
 No. 411 Dated: 19/05/2023



OFFICE ORDER:

In compliance of the Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar vide letter bearing No. 10811, dated 11-04-2022, the competent authority DEO (M) Orakzai is pleased to withdraw the promotion orders bearing Encls: No. 6660, dated 10-12-2020 in respect of the following Monthly four promoted PSTs in BPS-12 to the posts of CTs in BPS-15 in District Orakzai of the promotion order ibid. Furthermore, the following teachers are hereby adjusted in the schools mentioned against their names with immediate effect.

S#	NAME	CURRENT PLACE OF POSTING	PLACE OF ADJUSTMENT
1.	Jabir Hussain	GMS Star Sam	GPS Darq Mela
2.	Khatla Jan	GMS Saif Feroz Khel	GPS Star Kadu
3.	Muhammad Yaqoob	GMS Yakho Kandov	GPS Garki Khel
4.	Muhammad Hanif	GMS Mishi Bazar	GPS Bada Chakhar
5.	Masceeb Rehman	GMS Babra Laski	GPS Gul Chani
6.	Gul Kanim	GMS Saif Feroz Khel	GPS Ghulak Ali Khel
7.	Dar Shah	GMS Bazid Khel	GPS Rangin Khel
8.	Mali Ur Rehman	GMS Aul Mela	GPS Dago Takhil
9.	Gul Rahim	GMS Ghilisan	GPS Khao Koda II
10.	Ashfaq Ali	GMS Khadi Sepoy	GPS Bai Kol
11.	Maskeen Khan	GMS Damber Laski	GPS Dera Salkhan
12.	Syed Khadim Hussain	GHSS Andhel	GMS P. S. S. S. S.
13.	Rasool Akbar	GMS Wampanda	GPS Kagha, Sheer Khel
14.	Hussain Asghar	GMS Khadi Sepoy	GPS Khaz Khushla
15.	Munawar Khan	GMS Sallal Darrah	GPS Arka Ali
16.	Shirin Hassan	GMS Miraha Payan	GPS Sulaym Khel
17.	Amjad Khan	GMS Zanka Khel	GPS Tag. 121
18.	Saqib Ul Islam	GMS Jarma District Kohat	Will be adjusted on and when the inter district transfer is withdrawn by the Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa
19.	Amir ur Rehman	GMS Swara Kol	GPS Swara Kol
20.	Hilmal Khan	GMS Swara Kol	GPS Khadi No. 1
21.	Munawar Khan	GMS Chapper Mishi	GPS Zer Chappi
22.	Muhammad Ghani	GMS Star Kada	Kot Af. Khel
23.	Pamela Khan	GMS Baghak	Ghulak A7 Khel
24.	Israfil Khan	GMS Dana Khula	GPS Tarapi Ali Khel

- Note:**
- 1) Fresh charge report in their original Basic Pay Scales as on 09-12-2020 should be submitted to all concerned within 15 days positively. In case of failure/refusal, they will be treated under the Khyber Pakhtunkhwa Govt. Services (Efficiency & Discipline) Rules, 2011.
 - 2) TADA is not allowed for joining of their duties.

DISTRICT EDUCATION OFFICER (MALE)
 DISTRICT ORAKZAI

- Copy of Even No. & Date:
 Copy forwarded for information and necessary action to the:-
- 1) Director Elementary and secondary Education Khyber Pakhtunkhwa Peshawar with the request to withdraw inter District transfer order in file S# 18, already transferred to District Kohat vide Directorate of ESSE KP No. 13658.
 - 2) Additional Director (Establish), Directorate of E&SE, IAs, Peshawar
 - 3) District Education Officer (M), District Kohat
 - 4) District Monitoring Officer, E&A, District Orakzai.
 - 5) District Accounts Officer, District Orakzai
 - 6) Deputy DEO (M), Orakzai.
 - 7) Assistant Director (Establish), Directorate of E&SE, KP, Peshawar vide his office letter quoted above.
 - 8) Principals/Head Masters/Incharge HM and Head Teachers concerned.
 - 9) EDOs concerned for further necessary action.
 - 10) Superintendent/ Pay Clerk C/O the DEO (M) Orakzai for further necessary actions.
 - 11) BPS concerned
 - 12) BPS concerned
 - 13) Office Copy

-58-
 DISTRICT EDUCATION OFFICER (MALE)
 DISTRICT ORAKZAI

16/A



OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ORAKZAI
 District HQ Babar Meta Orakzai, Kohat Road Mangu
 Phone # 0925-690017 Fax # 0925-690017
 Email deao@malakorakzai.com
 No 1969 Dated 13/06/2023



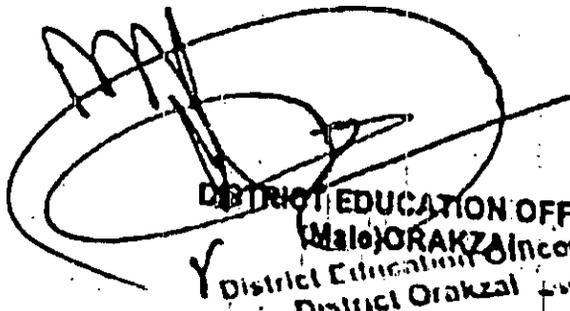
To

Mr. Saqib Ul Islam,
 Mr. Hussain Asghar,
 Mr. Naseeb Rehman and 21 Others

Subject: REVIEW APPEAL OF DEGRADATION

Memo:

Reference to the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Letter No. 18311 dated 11-04-2023, the promotion order vide No. 6660 dated 10-12-2020 has been withdrawn through letter No. 1411 dated 19-05-2023, Hence your application with the subject title of "Review appeal of degradation" cannot be entertained by the office of the undersigned as this office is not the appollant forum please


 DISTRICT EDUCATION OFFICER
 (Male) ORAKZAI
 District Education Officer
 District Orakzai

محکمہ تعلیمات ڈیپارٹمنٹ ایجوکیشن آفیسر ضلع اورگڑھی

۹۴۷-۱۷- جناب عالی

ایجوکیشن آفیسر
ڈیپارٹمنٹ

جناب - نظر ثانی پیر ڈیپارٹمنٹ آرڈر

گزارش محصور الذریعہ ہے کہ ہمارا آرڈر بطور PST (23/11/2009) کو

ہوا تھا۔ گیارہ سال بعد ان PST اساتذہ کو 2020-12-10 DPC میں CT پر

پروموشن دیا گیا۔ چونکہ ٹائٹل میں SPST (14 سکین) کا کوئی پوسٹ نہیں ہے۔

یہ اساتذہ PSHT (15 سکین) کے بھی حقدار تھے۔ چونکہ ٹائٹل میں CT سہی اساتذہ

زیادہ خالی تھیں۔ PSHT (15 سکین) نہ ہوئے پیر ان اساتذہ کو CT پر پروموشن

دیا گیا۔ چونکہ CT to PST کا 60% کوٹہ ہے۔

جناب والد - ات ڈھائی سال CT پر گزارنے کے بعد ان اساتذہ کو CT (15 سکین) سے دوبارہ

PST (12 سکین) پر ڈیپارٹمنٹ کیا گیا۔

لہذا اب ماحضرات کی شان افسر میں گزارش کی جاتی ہے۔ کہ اس ڈیپارٹمنٹ آرڈر

پر نظر ثانی کرتے سائین کر اوصاف دے کر شکور فرمائیں۔

سین گزارش ہوگی - مورخہ 20/05/2023

copy to

1 - ڈی سی اورگڑھی

2 - ڈی ای او اورگڑھی

3 - ڈائریکٹر آف ایجوکیشن ایئرڈ

سکندری ایجوکیشن

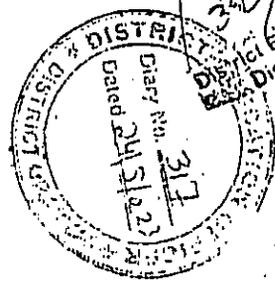
4 - سیکرٹری ایجوکیشن کے پی 2

ایجوکیشن آفیسر
ڈیپارٹمنٹ
The Appellate
Cannot be
الغار حسین

DPC-2020

PST to CT

All teachers



17/A

~~Journal~~

اسرار افغان (14)

Sanjid

تاقب السلام (1)

Khatajeh

فانسان (15)

M. milk

منور افغان (2)

~~Har~~

فانسان (16)

Aandeh

افغان (3)

nn

منور افغان (17)

فانسان (4)

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فانسان (18)

فانسان (5)

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فانسان (19)

فانسان (6)

افغان علی (6)

~~Har~~

فانسان (20)

Daail

دلیل شاه (8)

فانسان (21)

فانسان (9)

فانسان (22)

فانسان (10)

M. y

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M. y

A. m

افغان (11)

P. m

افغان (12)

افغان (13)

"17/B"

"F/1"



SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR
F.NO. 61/DISTRICT CADRE TRANSFERS
NO. 22904 DATED 09-08/2023

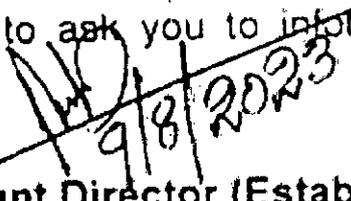
To

The District Education Officer (Male).
Orakzai at Hangu

Subject: - **APPEAL FOR RESOTRATION OF PROMOTION ORDER.**

I am directed to refer to the subject cited above and to state that the Appellant Authority is pleased to reject the appeal in respect of Mr. Naseeb Ur Rehman Ex CT, and 23 others, promoted from the post of PSTs (BS-12) to the post of CTs (BS-15), against the existing rules/policy

In this regard, I am further directed to ask you to inform the appellants accordingly, please.


Assistant Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa

Endst: No. _____ /F.No.37

Copy of the above is forwarded to the:-

1. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.

Assistant Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa

-18-

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Appeal No /2023

Naseeb Rehman

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Fechnation Deptt

(RESPONDENT)
(DEFENDANT)

I/We Appellant

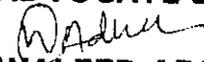
Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. / /2023

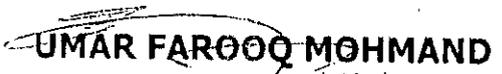
CLIENT 

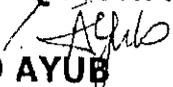
ACCEPTED

**NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT**

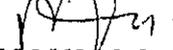

WALEED ADNAN


KAMRAN KHAN


UMAR FAROOQ MOHMAND


MUHAMMAD AYUB

&


**MAHMOOD JAN
ADVOCATES**

OFFICE:
Flat No. (TF) 291-292 3rd Floor,
Deans Trade Centre, Peshawar Cantt.
(0311-9314232)