

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

C.M. NO. \_\_\_\_\_/2023

IN

Service Appeal No.1669/2023

HAJI MUHAMMAD

V/S

EDUCATION DEPARTMENT

**INDEX**

| <b>S. NO.</b> | <b>DOCUMENTS</b>                   | <b>ANNEXURE</b> | <b>PAGE</b> |
|---------------|------------------------------------|-----------------|-------------|
| 1.            | Memo of Application with affidavit | .....           | 1           |
| 2.            | Copy of relevant documents         | "A"             | 2-7         |

Dated 9/9/23

APPLICANT/APPELLANT

Through:

  
**NOOR MOHAMMAD KHATTAK**  
Advocate Supreme Court.

-1-

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

C.M. NO. \_\_\_\_\_/2023

IN

Service Appeal No. 1669/2023



HAJI MUHAMMAD

V/S

EDUCATION DEPTT

**APPLICATION FOR PLACING ON FILE NECESSARY  
DOCUMENTS IN THE ABOVE TITLE SERVICE  
APPEAL**

Respectfully Sheweth:

1. That the above title service appeal is pending adjudication before this Honourable Tribunal which has been fixed for hearing on 05.09.2023
2. That there are some necessary documents that needs to be place on file for the just and fair decision in the above titled service appeal. Copy of Additional Documents are attached as **Annexure ..... A.**
3. That any other grounds and proof with regard to the additional documents would be raised at the time of argument with prior permission of this Honourable Tribunal.

It is, therefore, most humbly prayed that on acceptance of this application on behalf of the appellant the additional documents may be placed on file, for just and proper decision of the above mentioned service appeal.

Dated 4/9/23

  
APPLICANT/APELLANT  
HAJI MUHAMMAD

Through:

  
**NOOR MOHAMMAD KHATTAK**  
Advocate Supreme Court.

**AFFIDAVIT**

I, Haji Muhammad (the Applicant/Appellant) do hereby solemnly affirm and declare on Oath that the contents of this **Application** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

  
**DEPONENT**



"A" -2-

**DIRECTORATE OF ELEMENTARY &  
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA, PESHAWAR**

**NOTIFICATION**

The following SSTs (M&F) are hereby transferred and posted against the newly created posts of **ASDEOs in District North Waziristan/ Kurram** in their own pay & BPS in the interest of public service with immediate effect with the terms and conditions as mentioned below.

| S# | Name & Designation   | Place of present posting        | Where posted as              | Remarks                    |
|----|----------------------|---------------------------------|------------------------------|----------------------------|
| 1  | Mr.Dildar Husain SST | GMS Parachinar<br>Kurram        | ASDEO (M)<br>Kurram          | Against newly created post |
| 2  | Mr.Munir Hussain SST | GHS Bughadi<br>Kurram.          | ASDEO (M)<br>Kurram          | -do-                       |
| 3  | Muhammad Farooq SST  | GHS Arwalai<br>Kurram.          | ASDEO (M)<br>Kurram          | -do-                       |
| 4  | Shams u zaman SST    | GMS Zarana<br>Kurram            | ASDEO (M)<br>Kurram          | -do-                       |
| 5  | Haj Muhammad SST     | GHS Spinwam<br>North.Waziristan | ASDEO(M) North<br>Waziristan | -do-                       |

**TERMS AND CONDITIONS**

1. Charge reports should be sent to all concerned.
2. No TA/DA etc. are allowed.
3. The order of the above named SSTs against the posts of ASDEOs will be affective subject to the condition that they will give an under taking on judicial stamp paper to the D.E.O. concerned to the effect that they will neither claim the seniority of ASDEO Posts nor absorption in management cadre.
4. The terms and conditions mentioned in their appointment/promotion order as SST (Teaching cadre) will intact.

**Director**  
**Elementary & Secondary Education**  
**Khyber Pakhtunkhwa**

Endst: No. 2557-64A-12/ADEO (M) Dated Pesh: the 19/2 2021

Copy forwarded to the:-

- 1 Additional Director (Estab) Merged Districts Local Directorate.
- 2 District Education Officers concerned.
- 3 District Accounts Officers concerned.
- 4 Principal/Headmaster & Headmistress concerned.
- 5 Officials concerned.
- 6 PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

**ATTACHED**

**DEPUTY DIRECTOR (ESTAB)**  
**MERGED DISTRICTS**

1

A

-3-

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA, PESHAWAR.**

**Notification**

Consequent upon the approval of the competent authority, the following transfers/postings are hereby ordered in their own pay & BPS with immediate effect in the interest of public service.

| S/N | Name/Designation   | Posted at                                    | Remarks     |
|-----|--|--|-------------|
| 1   | Mr. Noor Ullah Jan SST/ADEO at DEO Office North Waziristan   | SST GHS Miran Shah District North Waziristan | Vice S.No.2 |
| 2   | Mr. Ihsan Ullah SST GHS Miran Shah District North Waziristan | ADEO at DEO Office North Waziristan          | Vice S.No 1 |

**Note:-**

- 1 Charge report should be submitted to all concerned
- 2 TADA etc. are not allowed.

**Director**  
Elementary and Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst. No. 565-71 / A-12/DEOs in Merged Districts Khyber Pakhtunkhwa  
Dated Peshawar: the 24/6 2020

**Copy forwarded to the:-**

- 1 District Education Officers North Waziristan.
- 2 District Accounts Officer North Waziristan.
- 3 Principal GHS Miran Shah District North Waziristan.
- 4 Officers concerned.
- 5 PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 6 Teachers concerned.
- 7 P/Files.

S  
24/6/2020  
Deputy Director (Estab)  
Merged Districts

ATTACHED



**RATIONALIZATION ORDER:**

As recommended by the ADEO Circle Concerned, Mr. Mujahid Rahman TT is hereby rationalized from GPS Maroof Khan Kot Miranshah to GPS Abdul Qadim Kot Tehsil Miranshah On his own Pay & Scale in the best interest of Public Service.

1-No TA/DA is allowed.

2-Charge report should be submitted in duplicate to all concerned.

**DISTRICT EDUCATION OFFICER  
NORTH WAZIRISTAN**

No. 17078-81 Rationalization/Male

Dated M/Shah the: 28/05/2021

**Copy to the**

- 1- The Director Elem. & Sec: Education KPK Peshawar.
- 2- The Deputy Commissioner North Waziristan at Miranshah.
- 3- The District Accounts Officer North Waziristan at M/Shah.
- 4- Head Teacher Concerned.
- 5- ADEO Circle Concerned.
- 6- Accountant: local office.
- 7- KPO of this office.

**DISTRICT EDUCATION OFFICER  
NORTH WAZIRISTAN**

RECEIVED



**MUTUAL TRANSFER ORDER:**

As proposed by ADEO Circle concerned Mutual Transfer in R/O the following Teachers are hereby ordered on their own pay & BPS to school mentioned against each w.e.f from the date of taking over charge.

| S.No | Name & Design              | From                    | To                      | Remarks    |
|------|----------------------------|-------------------------|-------------------------|------------|
| 01   | Mr. Rasool Qadoos<br>PST   | GPS Palangzai           | GPS Fazal Rehman<br>Kot | Vice No 02 |
| 02   | Mr. Noor Abbas Khan<br>PST | GPS Fazal Rehman<br>Kot | PS Palangzai            | Vice No:01 |

**NOTE:**

1-No TA/DA is allowed.

2-Charge report should be submitted in duplicate to all concerned.


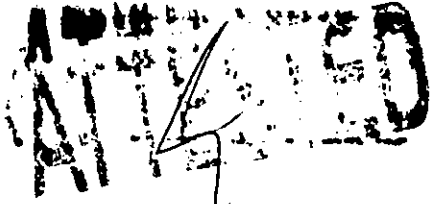
  
DISTRICT EDUCATION OFFICER  
NORTH WAZIRISTAN

No. 14845-50 /Transfer/PST-Male /Dated M/Shah the 25/2/2021

**Copy to the:**

- 1- Director of Education (NMD) Khyber Pakhtoon khwa Peshawar.
- 2- District Accounts Officer North Waziristan at M/Shah.
- 3- Head Teacher Concerned.
- 4- Teacher Concerned.
- 5- Accountant local office.
- 6- Personal file.

  
DISTRICT EDUCATION OFFICER  
NORTH WAZIRISTAN



OFFICE OF THE DISTRICT EDUCATION OFFICER  
TRIBAL DISTRICT NORTH WAZIRISTAN AT MIRANSHAH  
Ph: 0928-313040 Email: deo\_mnwtd@gmail.com

-6-

**RATIONALIZATION ORDER:**


On the recommendation by the ADEO Circle Concerned for functionalization the dysfunctional institutions in North Waziristan District the following male Teachers is hereby rationalized against schools mentioned each on their own Pay & Scale with the best interest of Public Service till further order.

| S.No | Name               | From        | To                | Remarks |
|------|--------------------|-------------|-------------------|---------|
| 1    | Mr. Sami Ullah PST | GPS Lwarga  | GPS Ghulam Khan   | AVP     |
| 2    | Mr. Salim Khan PST | GPS Chatoon | GPS Dewgar Saidgi | AVP     |

**NOTE:**

1-No TA/DA is allowed.

2-Charge report should be submitted in duplicate to all concerned.

  
DISTRICT EDUCATION OFFICER  
NORTH WAZIRISTAN

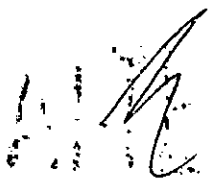
No: 17103-07 /Rationalization/Male

Dated M/Shah the: 27/5/2021

**Copy to the:**

- 1- The Director Elem: & Sec: Education KPK Peshawar.
- 2- The Deputy Commissioner North Waziristan at Miranshah.
- 3- The District Accounts Officer North Waziristan at M/Shah.
- 4- Head Teachers Concerned.
- 5- ADEO Circle Concerned.
- 6- Accountant local office.
- 7- KPO of this office.

DISTRICT EDUCATION OFFICER  
NORTH WAZIRISTAN

  
DISTRICT EDUCATION OFFICER  
NORTH WAZIRISTAN





DIRECTORATE OF ELEMENTARY &  
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA, PESHAWAR

7-

**NOTIFICATION**

Consequent upon approval of the Competent Authority the following postings/transfers are hereby ordered in their own pay & BPS in the best interest of public service with immediate effect with the following terms and conditions:-

| S# | Name<br>Designation         | & | Place of present<br>posting           | Where posted<br>as                       | Remarks     |
|----|-----------------------------|---|---------------------------------------|--|-------------|
| 1  | Mr. Ihsan Ullah<br>ADEO/SST |   | ADEO at District<br>North Waziristan  | GHS Land<br>District North<br>Waziristan | Vice S No.2 |
| 2  | Mr. Muhib Ullah<br>SST      |   | GHS Land District<br>North Waziristan | ADEO at<br>District North<br>Waziristan  | Vice S No.1 |

**TERMS AND CONDITIONS**

1. Charge reports should be sent to all concerned.
2. No TADA etc. are allowed.
3. The order of the above named SSTs against the posts of ADEO/ASDEOs will be effective subject to the condition that they will give an under taking on judicial stamp paper to the District Education Officers concerned to the effect that they will neither claim the seniority of ASDEO Post nor absorption in Management Cadre.
4. The terms and conditions mentioned in his appointment/promotion order as SST (Teaching Cadre) will remain intact.

**Director**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

Endst: No. 18384-88 /A-12/ADEO (M) Dated Pesh: the 30/03 2023

- Copy forwarded to the:-
- 1 District Education Officer North Waziristan at Tank.
  - 2 District Accounts Officer North Waziristan at Tank.
  - 3 Principal/Headmaster concerned.
  - 4 Officials concerned.
  - 5 PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

Deputy Director (Estab)(m)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa