

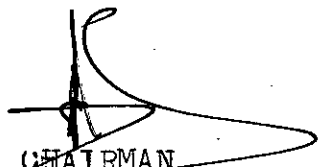
8. 16.3.2015

Appellant in person and Mr.Haroon-ur-Rashid, Supdt: for respondents alongwith Mr.Muhammad Tahir Aurangzeb,G.P present. Appellant submitted application for withdrawal of appeal while representative submitted office order vide which the services of appellant have been restored.

In the light of the above, since the appellant has been ~~adjusted~~ as such the service appeal is dismissed as withdrawn. File be consigned to the record.

ANNOUNCED

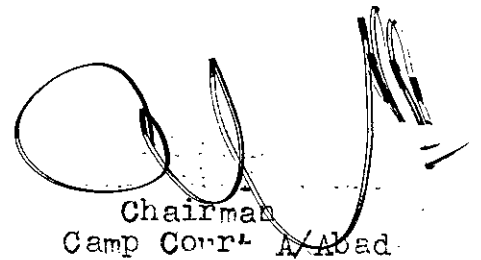
16.3.2015


CHAIRMAN
Camp Court A/Abad

1603-15

6 - 20.10.2014

Appellant in person and Mr. Muhammad-
Tahir Aurangzeb, G.P for the respondents
present. Written reply has not been received
on behalf of the respondents despite another
chance given for the purpose on the previous
date. Neither arguments could be heard on
application for interim relief due to non-
availability of learned counsel for the
appellant. A last chance is given for written
reply/comments on behalf of the respondents
arguments on application for interim relief
at camp court A/Abad on 19.01.2015.



Chairman
Camp Court A/Abad

7 -

19.01.2015


Appellant in person and Mr. Muhammad-
Tahir Aurangzeb, G.P for respondents present.
Comments not submitted as according to learned
G.P it was the personal responsibility of the
respondents who had not contacted him despite
repeated adjournments. One other opportunity
granted to the respondents with the direction
to the learned G.P to contact the respondents
in the prescribed manners for submission of
written reply/comments on 16.3.2015 at camp
court A/Abad.

Arguments on application could not be
heard due to adjournment application of the
learned counsel for the appellant which are
to be heard on the afore-stated date.

Chairman

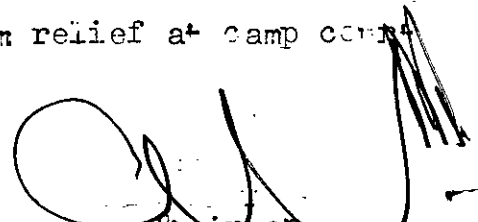
4- 17.3.2014

Appellant with counsel and Mr. Sakeenullah, ADO on behalf of official respondents No. 1 to 3 with Mr. Muhammad Tahir Arangzeb, G.P. present. Private respondent No. 4 is absent despite his service through registered post, hence proceeded against ex-parte. The learned counsel for the appellant moved application for grant of temporary injunction, copies thereof are handed over to the representative of the respondents as well as learned G.P. for reply and arguments on the application as well as written reply/comments at camp court A/Abad on 16.6.2014.


Chairman
Camp Court A/Abad

5- 16.6.2014

Appellant in person and Mr. Sakeenullah, ADO on behalf of respondents No. 1 to 3 with Mr. Muhammad Tahir Arangzeb, G.P. present. Reply to application for interim relief received on behalf of respondents No. 1 to 3, but only signed by respondent No. 1 i.e. SDEO(M) Mansehra. Written reply has not been received on behalf of the respondents, and request for further time made on behalf of the respondents. Appellant also requested for adjournment due to non-availability of his counsel. Another chance is given for written reply/comments on behalf of the respondents as well as arguments on application for interim relief at camp court A/Abad on 20.10.2014.


Chairman
Camp Court A/Abad

Appeal No. 1398/2013.
Mr. Abul Mejid -

Appellant with counsel present and heard on preliminary.

3, 11.11.2013

Contended that the appellant was appointed as class-IV against the

vacant post at GGPS, Reen, Tehsil Balakot District Mansehra vide

order dated 22.07.2011. *the appellant was post at Reen vide order dt 8-9-2011*

After serving for more than five months,
the ~~transfer~~ order of the appellant was cancelled vide

impugned order dated 25.02.2013. The appellant filed

departmental appeal on 21.06.2013 which has not been responded

within the statutory period of 90 days, hence the present appeal on

09.10.2013. Points raised at the Bar need consideration. The appeal

is admitted to regular hearing subject to all legal objections. The

appellant is directed to deposit the security amount and process fee

within 10 days. Thereafter, notice be issued to the respondents.

Appellant also filed an application for suspension of the operation

of the impugned order dated 25.02.2013. Notice of application

should also be issued to the respondents. Counsel for the appellant

requested that the said appeal may be fixed for further proceeding

in camp court Abbotabad To come up for written reply on main

appeal as well as reply arguments on application on 17.03.2014 at

camp court Abbotabad.


Member.

*Note the appellant deposited
Security & Process fee Rs 200/-
Bank receipt' attache on file*

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 1398/2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
3	14/11/13	3
1	09/10/2013	<p>Principal seat of War Abdulla Majid presented to Deyo Mup Dildar Primary hearing on 11.11.2013 instead of 14.4.2014 at Peshawar. Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;">REGISTRAR</p>
2	30-10-13	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up there on <u>14-4-14</u></p> <p style="text-align: right;">CHAIRMAN</p>
	31.10.2013	<p>Appellant moved an application for early hearing at Principal seat Peshawar instead of Abbottabad. The application is allowed. Notices be issued to the appellant/counsel for Preliminary hearing on 11.11.2013 at Peshawar instead 14.4.2014.</p> <p style="text-align: right;">CHAIRMAN</p>

**BEFORE THE SERVICE TRIBUNAL,
KPK PESHAWAR**

Appeal No. 1398/2013

Abdul MajidAppellant

VERSUS

Sub-Divisional Education Officer (Male),
Mansehra etc.....Respondents

SERVICE APPEAL

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Dated 05.10.2013

Majid
Abdul Majid
...Appellant

Through

(Signature)
DILDAR AHMED KHAN LUGHMANI,
Advocate Supreme Court,
Of Pakistan.

~~④~~

Hand

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①

**BEFORE THE SERVICE TRIBUNAL,
KPK PESHAWAR**

Appeal No. 1398/2013

1456
09/10/13

Abdul Majid son of Ghulam Rabbani
presently posted at Government Primary
School Hungrayee, Tehsil Balakot District
MansehraAppellant

VERSUS

Appellate No. 4
Proceed against
ex-facto vide
order dt 17-3
14
Recd

1. Sub-Divisional Education Officer (Male),
Mansehra.
2. Assistant Sub-Divisional Education Officer
(Male) Circle Kaghan.
3. District ~~Education~~ Officer, District Mansehra.
- ④ Manzoor Hussain son of Abdul Wakeel Khan
resident of Dara Mansehra presently posted at
Government Girls Primary School Reen,
Tehsil Balakot District Mansehra
.....Respondents.

6.9.13
9/10/13

**SERVICE APPEAL AGAINST THE
ORDER NO.585-88 GB III SDO(M)
DATED 25.02.2013 PASSED BY
RESPONDENT NO.1 VIDE WHICH
RESPONDENT NO.1 WITHOUT ANY
RHYME AND REASON AND WITHOUT
AFFORDING ANY KIND OF
OPPORTUNITY OF BEING HEARD TO
THE APPELLANT CANCELLED THE
ORDER BEARING NO.2446-50 DATED
08.09.2012.**

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PRAYER:-

On acceptance of instant appeal, impugned order passed by respondent No.1 may please be set aside and the order No.2446-50 dated 08.09.2012 may please be restored.

Respected Sir,

1. That, the appellant was appointed as Class-IV in Education Department in July 2011 at Government Girls Primary School Reen, Tehsil Balakot District Mansehra. *(Copy of the appointment order is annexed as annexure "A")*.
2. That, since the appointment of the appellant, he served in the Government Girls Primary School Reen upto 08.09.2012. Appellant performed his duties with due diligence, honestly and regularly.
3. That, there is no complaint against the appellant since his appointment uptill now and appellant has good reputation in the education department for his regular and honest service/duty.

4. That, respondent No.4 was serving in Government Primary School Hungrayee for the last 22/23 years but he is not performing his duties as he is ill, unfit and therefore unable to perform his duty.
5. That, as there was no building of Government Primary School Hungrayee, Tehsil Balakot. The brother of the complainant namely Zulfiqar alienated four Kanals landed property in the name of education department where building of the Government Primary School Hungrayee was constructed and appellant was inducted in the department as Class-IV on the basis of this alienation of the landed property by the brother of the appellant.
6. That, as the respondent No.4 was serving in the Government Primary School Hungrayee for the last 22/23 years and respondent No.4 himself asked the appellant for transfer from Government Primary School Hungrayee to Government Girls Primary School Reen. In this respect, a deed was scribed on 14.03.2011 in

(4)

presence of the witnesses which was duly signed by respondent No.4 on the basis of that deed, respondent No.1 issued the transfer order No.2426-50 dated 08.09.2012 vide which appellant was transferred from Government Girls Primary School Reen to Government Primary School Hungrayee and respondent No.4 was transferred from Hungrayee to Reen.

(Copy of the deed and the transfer order dated 08.09.2012 are annexed as annexure "B" & "C").

7. That, the appellant has obtained the copy from the attendance register from June 2012 to September 2012 wherein in October 2012 respondent No.4 has got made an entry in the said register for the month of October 2012 that he has applied for pension due to his illness, which clearly transpire that the respondent No.4 is unable to perform his duty.

(Copy of the extract from the attendance register are annexed as annexure "D").

8. That, after issuance of the order dated 08.09.2012, appellant took the charge in Government Primary School

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Hungrayee on 09.09.2012 since then the appellant is performing his duty in the said school regularly.

(Attested copy of the charge report is annexed as annexure "E").

9. That, later on respondent No.4 in collusion with the other respondents secretly got cancelled the order dated 08.09.2012 and the respondent No.1 issued the impugned order dated 25.02.2013 vide which the respondent No.1 cancelled the order dated 08.09.2012 and the impugned order was kept in secret from the appellant and no information/intimation was given to the appellant and appellant has got no information from any other quarter. Respondent No.4 produced the impugned order in the Government Primary School Hungrayee in June 2013 wherefrom appellant came to know about the impugned order.

(Copy of the impugned order is annexed as annexure "F").

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10. That, appellant then filed a representation on 21.06.2013 which is still awaited for decision.

(Copy of the representation is annexed as annexure "G").

11. That, the appellant seeks the gracious indulgence of this Honourable Court, inter alia, on the following amongst the other grounds:

GROUND

- i. That, the impugned order is wrong, illegal, against the law, facts as well as against the norms of natural justice hence not maintainable in the eye of law and is liable to be set aside.
- ii. That, the respondent No.1 passed the impugned order without any rhyme and reason and without affording any kind of opportunity to the appellant of being heard. In this way, the appellant was condemned unheard in the matter.
- iii. That, under the law and policy of the education department that tenure must be observed while the impugned order was passed after five months of the

⑦

transfer order dated 08.09.2012, which is against the law, rules and policy of the department.

- iv. That, the impugned order is the result of political affiliation of the respondent No.4 with the local MPA and MNA. Appellant was politically victimized by all the respondents in connivance with each other.
- v. That, it is well in the knowledge of the respondents No.1 to 3 that respondent No.4 is an ailing person and unable to perform the duty and he is not performing his duties and remains absent from the school but even then he was again transferred to the Government Primary School Hungrayee.
- vi. That, appellant is class-IV and under the law he must be posted in his own village and the brother of the appellant has also alienated four Kanals landed property in the name of education department. In this way, appellant is entitled to be posted in Government Primary School Hungrayee.
- vii. That, the respondent No.4 remained absent from his duty in Government Primary School Hungrayee as well as Government Girls Primary School Reen. Respondent No.4 inspite of his long

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absence from the school he was marked as present in the Government Primary School Hungrayee by the officials of that school and on the direction and pressure of respondents No.1 to 3.

- viii. That, respondent No.4 has agreed on the transfer of the appellant from Government Girls Primary School Reen to Government Primary School Hungrayee through deed dated 14.03.2011 but later on he in connivance with the other respondents refused to act upon the said deed. Under the law, principle of estopple is applicable against the respondent No.4 as the transfer order dated 08.09.2012 was passed with the consent of the respondent No.4 and he is also bound to honour the above-mentioned deed.
- ix. That, the respondent No.1 has passed the impugned order by stating therein that the cancellation of the transfer order dated 08.09.2012 is in the interest of the public service whcih is totally wrong, illegal and against the law and malafide. As the interest of public service is that the appellant be posted at his home station i.e. Government Primary school Hungrayee where the appellant may perform his duty regularly and honestly. Respondent No.4

(9)

is residing at Dara Mansehra for the last 07 years and he is not attending the school where he is posted which is a far flung area from Mansehra.

- x. That, the impugned order is not maintainable in the eyes of law which is liable to be set aside.

It is, therefore, most humbly prayed that on acceptance of instant appeal, impugned order passed by respondent No.1 may please be set aside and the order No.2446-50 dated 08.09.2012 may please be restored.

Dated 05.10.2013

Abdul Majid
...Appellant

Through

DILDAR AHMED KHAN LUGHMANI,
Advocate Supreme Court,
Of Pakistan.

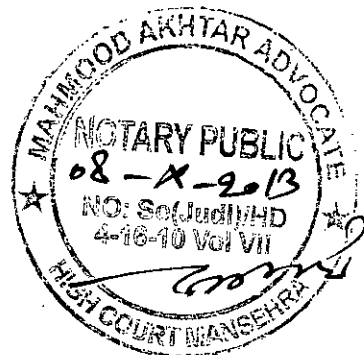
AFFIDAVIT.

I, Abdul Majid son of Ghulam Rabbani presently posted at Government Primary School Hungrayee, Tehsil Balakot District Mansehra, Appellant, 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 nothing has been concealed from this Honourable Court.

Dated 05.10.2013

Abdul Majid
(DEPONENT)

ATTESTED



(DEFOZENI)
Abdul Majid

Dated 02.10.2013

From this Honourable Court
relief and nothing has been concealed
correct to the best of my knowledge and
contents of this service subject are true and
affirm and declare on oath that the
Mansoor, appellant do hereby solemnly
School Huzar, Tehsil Huzar District
presently posted at Government Primary
I Abdul Majid son of Qurban Kabbani
AFIDAVIT

DEFOZENI

OF Pakistan
Advocate Supreme Court
DIGDAR AHMED KHAN T. CHINWAL

Through

...Appellant
Abdul Majid

Dated 02.10.2013

please be restored.

order No. 3440-20 dated 08.02.2013 may
No. 1 may please be set aside and the
impugned order passed by respondent
on acceptance of instant appeal.
It is, therefore, most humbly prayed that
liable to be set aside.

maintainable in the eyes of law which is

x. That, the impugned order is not

being area from Mansoor.

school where he is posted which is a far
07 years and he is not attending the
is residing at Dara Mansoor for the last

10

**BEFORE THE SERVICE TRIBUNAL,
KPK PESHAWAR**

Abdul MajidAppellant

VERSUS

Sub-Divisional Education Officer (Male),
Mansehra etc.....Respondents

SERVICE APPEAL

**APPLICATION FOR SUSPENSION OF
OPERATION OF IMPUGNED ORDER
NO.585-88 GB III SDO(M) DATED
25.02.2013 TILL THE DISPOSAL OF
MAIN APPEAL.**

Respectfully Sheweth!

1. That, this application may please be considered as part and parcel of main appeal.
2. That, the appellant has a prima facie case and there is every hope of its success.
3. That, the balance of convenience also lies in favour of the appellant.
4. That, if the operation of impugned order has not been suspended, appellant would suffer an irreparable loss.

(11)

It is, therefore, most humbly requested that the operation of impugned order dated 25.02.2013 may please be suspended till the disposal of main appeal.

Dated 05.10.2013



Abdul Majid
...Appellant

Through



DILDAR AHMED KHAN LUGHMANI,
Advocate Supreme Court,
Of Pakistan.

AFFIDAVIT.

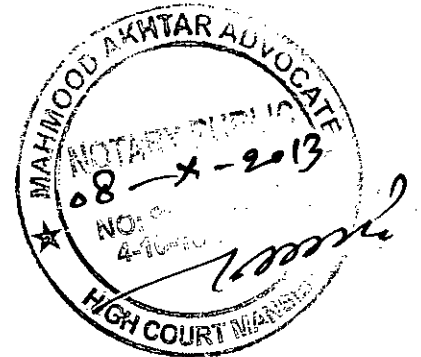
I, Abdul Majid son of Ghulam Rabbani presently posted at Government Primary School Hungrayee, Tehsil Balakot District Mansehra, Appellant, do hereby solemnly affirm and declare on oath that the contents of this application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Dated 05.10.2013



Abdul Majid
(DEPONENT)

ATTESTED



(12)

**BEFORE THE SERVICE TRIBUNAL,
KPK PESHAWAR**

Abdul MajidAppellant

VERSUS

Sub-Divisional Education Officer (Male),
Mansehra etc.....Respondents

SERVICE APPEAL

CORRECT ADDRESSES OF THE PARTIES

APPELLANT

Abdul Majid son of Ghulam Rabbani
presently posted at Government Primary
School Hungrayee, Tehsil Balakot District
Mansehra.

RESPONDENTS

1. Sub-Divisional Education Officer (Male),
Mansehra.
2. Assistant Sub-Divisional Education Officer
(Male) Circle Kaghan.
3. District ~~Education~~ Officer, District Mansehra
4. Manzoor Hussain son of Abdul Wakeel Khan
resident of Dara Mansehra presently posted at
Government Girls Primary School Reen,
Tehsil Balakot District Mansehra.

Dated 05.10.2013



Abdul Majid
...Appellant

Through



DILDAR AHMED KHAN LUGHMANI,
Advocate Supreme Court,
Of Pakistan.

Annexure 'A'

OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION MANSEHRA

ORDER

As approved by the Departmental Selection Committee, the Competent Authority has been pleased to appoint the following Class-IV Government Servants against vacant posts mentioned against each in BPS-1 @ Rs.2970-90-5670 pm plus usual allowances as admissible under the rules in the interest of Public Service with effect from the date of their taking over charge subject to the following terms & conditions:-

S.#	Name	Father's Name	Residence	Designation	Place of Posting	Remarks
1	Zulfiqar Ali	Hayat Muhammad	Beesan Pairan	Chowkidar	GPS Beesan Pairan	A/V post
2	Chowdry Naseer Ahmad	Pir Khan	Bagal Char	Chowkidar	GPS Bagal Char	A/V post
3	Saad Sarfraz	Muhammad Sarfraz	Chakia	Chowkidar	GMS Hado Bandi	A/V post
4	Muhammad Qasir	Muhammad Sarwar	Rehar	Chowkidar	GMS Rehar	A/V post
5	Muhammad Naveed	Muhammad Niaz	Nanoha Kalan	Chowkidar	GMS Nanoha Kalan	A/V post
6	Raza Muhammad Khan	Muhammad Naseer Khan	Ghanool	Chowkidar	GGHS Ghanool	A/V post
7	Iqbal Malik	Sardar Muhammad Khan	Ghanool	Lab:Attend:	GGHS Ghanool	A/V post
8	Muhammad Shakeel	Abdul Khaqan	Kharian	Chowkidar	GPS Kharian	A/V post
9	Sajjad Hussain	Muhammad Miskeen Khan	Balakot	Behashti	GHS Balakot	A/V post
10	Muhammad Tufail	Shah Jehan	Kanshian	N/Qasid	GHS Kanshian	A/V post
11	Muhammad Sabir	Shah Mardan	Balgran	Naib Qasid	GGMS Kamal Bar	A/V post (Disable)
12	Muhammad Rafique	Sher Baz	Kot Gali	Lab:Attend:	GHS Kot Gali	A/V post
13	Abdul Majid	Ghulam Rabbani	Hangari	Chowkidar	GGPS Reen	A/V post
14	Muhammad Hassan	Umer Khatab	Seri Kaghan	Chowkidar	GPS Kinari	A/V post
15	Rafaqat Ahmad	Muhammad Irfan	Ghanool	Chowkidar	GPS Dabrian	A/V post
16	Sabib Khan	Duri Aman	Sauch	Chowkidar	GPS Sauch	A/V post
17	S.Arshad Hussain Shah	S.Sikandar Shah	Banjo Katha	Chowkidar	GPS Banjo	A/V post
18	Muhammad Bashir	Muhammad Ali	Dalbani	Chowkidar	GPS Dehdi Dalbani	A/V post
19	Muhammad Arshad	Ali Bahadar	Jehangan	Chowkidar	GPS Jehangan	A/V post
20	Nadir Nazir	Muhammad Nazir	Sandasar	Chowkidar	GPS Sandasar	A/V post
21	Muhammad Younis	Sher Din	Khann	N/Qasid	GMS Khann	A/V post

Attested
M. J. Khan

22	Shah Khan	Muhammad Yaqoob	Khann	Sweeper	GMS Khann	A/V post
23	Ibrar Khan	Sharab Khan	Bawar Khan	Chowkidar	GGHSS Oghi	A/V post
24	Yousaf Khan	Shah Jehan	Lundi Chatta	Chowkidar	GPS Lundi	A/V post
25	Munir Ahmad	Farid ur Rehman	Darband Moorat	Chowkidar	GPS Bagwai	A/V post
26	Sajib	Muhammad Fareed	Mera	Sweeper	GHSS Shergarh	A/V post Dec:Son
27	Muhammad Ayub	Abdul Qayyum	Chamb	Chowkidar	GGPS Chamb	A/V post
28	Muhammad Pervez	Rehmat ullah	Fateh Bandi	N/Qasid	GGMS Fateh Bandi	A/V post
29	Muhammad Shafique	Haji Muhammad Akbar	Khari	Chowkidar	GGPS Khari	A/V post

Employee's Sons						
S.#	Name	Father's Name	Residence	Designation	Place of Posting	Remarks
1	Shahzad	Haq Nawaz	Bandian	Chowkidar	GGPS Baidra Bandian	Emp:son
2	Hamid	Mir Rehman	Bani Karnol	Chowkidar	GPS Sial	Emp:son
3	Abdur Rasheed	Chan Sardar	Bajmori	Chowkidar	GGPS Bajmori	Emp:son
4	Muhammad Rafique	Rehmat ullah	Kot Gali	Sweeper	GHS Kot Gali	Emp:son
5	Waseem Gul	Muhammad Tasteem	Shinkhari	Naib Qasid	GHS Shinkhari	Emp:son
6	Muhammad Asif	Abdullah Jan	Rash Sikandara	Chowkidar	GPS Rash Sikandara	Emp:son
7	Shakeel Ahmad	Aurang Zeb	Tumbah	Chowkidar	GPS Mara Swati Abad	Emp:son
8	Fakhar Zaman	Gohar Aman	Bankot	Chowkidar	GPS Kot	Emp:son
9	Jamil ur Rehman	Ghulam Sarwar	Fareed Abad	N/Qasid	GMS Khakoo	Emp:son
10	Muhammad Jehangir	Taj Muhammad	Kalwal	Chowkidar	GPS Kalwal	Emp:son
11	Sadaqat Qayyum	Abdul Qayyum	Sehra Gali	Chowkidar	GPS Sehra Gali	Emp:son

TERMS & CONDITIONS:

1. Their appointments are purely on temporary basis and liable to termination at any stage without assigning any reason/notice.
2. They will be governed by such rules and regulations enforce and as may be prescribed by the Government from time to time for the category of the Government servants to which they belong.

Attested
M. J. J.

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3. In case they failed to assume the charge of their posts within 15 days of his appointment, candidature-ship will be stand automatically cancelled.
4. Their services are liable to termination on one month prior notice from either side in case of resignation without prior notice. Their one month pay/allowances if any shall be forfeited to Government Treasury.
5. They will not be entitled for pension/gratuity & they will not contribute any amount towards GP Fund however they will contribute CP fund on the prescribed rate & half contribution will be made by the Government.
6. Their services can be terminated at any time in case their performance is found unsatisfactory and they will be proceeded against under E&D Rules 1973.
7. They should produce Age & Health Certificate from the MS DHQ Hospital Mansehra.
8. They may not be handed over the charge if their age is above 45 years and below 18 years.
9. No. TA/DA etc is allowed.
10. Charge report should be submitted to all concerned in duplicate.


Sd/-
(UMER KHAN KUNDI)
EXECUTIVE DISTRICT OFFICER
E&S EDU: MANSEHRA

Endst: No. 10648-991 C.IV/ Apptt./2011

Dated Mansehra the 22/07, 2011

Copy to the:-

1. Secretary to Govt: of KPK E&SE Department Peshawar.
2. Director E&SE Department KPK Peshawar.
3. District Accounts Officer, Mansehra.
- 4-5. DO (M&F) Local Office.
- 6-7. DDO (M&F) Local Office.
8. PS to Minister for E&S Edu: Department KPK Peshawar.
9. Principal/HM School concerned.
10. Manager Employment Exchange District Mansehra.
11. PA to District Coordination Officer, Mansehra.
- 12-52. Candidates concerned.


EXECUTIVE DISTRICT OFFICER
E&S EDU: MANSEHRA

attested
[Signature]

Annexure

'B'

میں کسی منظور چین و لاہور کوئی اقرار ناموں تکہ دینا ہوں
 کہ نئے سولہ کی بلڈنگ ٹیلے عید غلام ربانی ارجوس ۲ بیٹوں نے
 حکا چوئیرا کی ٹیلے دیا جبکہ میں ۱۶۴۴ چھبیس سال سے یہ
 ڈھوٹی کر رہا ہوں سیٹ پیرس چوئیرا کی ان کا حق انہوں نے
 اپنی زمین اس غرض سے یہی دیا ہے

اسیٹے اس اقرار نامے کے ذریعے تکہ دینا ہوں
 بینک کے فرہنگ کی وجہ سے جبوریوں ٹھیک فرہنگ ختم ہونے
 سے میں اس چوئیرا کی سیٹ ان کوغالی فریڈ
 کا پابند ہوں گا نیز یہ بھی اقرار ناموں کہ ان دوروں کے
 دوران بیماریا یا ان کی کوشش سے کہیں بھی سیٹ ط جانی
 مل جائے اس پر میں اپنی نیدرلی را اور انھیں یہاں اپنی تھوری
 کرانے ٹیلے چھوڑ کر کوشش اولیٰ گا اس کوشش میں دونوں
 فریق آئیں میں تعاون کریں گے

۱-392-1356-1358 نمبر روم و گولیاں مکھی کے نام مندریکے
 منظر چین چوئیرا پتھریلے سر آندہ
 P.T.C
 Adil
 19/11/20

AMIRKHA

13/3
2011

اعزاز نام ناکھتی تاریخ
لوانان

قاری شایب خان صاحب
صاحب نام سرکار

رحیم داد
سربراہین صاحب
صدر انور صاحب
صدر ایس آر صاحب

فریق دوم

ذوالفقار علی دہر مندیم ریائی مرحوم
ذوالفقار

قدرا محمد خان - 5
نذیر احمد خان
منیر حسین صدیق نورسوف خان
صدر ریاست خان
محمد علی احمد خان
علی احمد خان

ذوالفقار علی

Annexure 'C'

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&SE) MANSEHRA

ORDER

Consequent upon the approval of the competent authority the adjustment on vacant post in r/o following PST s are hereby made on their own pay and grade in the interest of public service.

S.No	Name of Teacher	From	To	Remarks
1	Abdul Majid chaw:-	SPS Reen	To SPS Hangori	V. 2
2	Munzoor Hussain chaw	SPS Hangori	To SPS Reen	V. 1
3	M. Naseem chaw:-	SPS Bari midam	To SPS Bam	V. 4
4	M. Banaras chaw:-	SPS Bam	To SPS Bari midam	V. 3
5	/	/	/	/
6	/	/	/	/

- Note:-
1. Charge Report should be submitted to all concerned.
 2. No TADA is allowed to any one.
 3. Tenure of the above said Teachers will be remain intact, no any break of their normal tenure.

Sd/
EXECUTIVE DISTRICT OFFICER
(E&SE) MANSEHRA

Enclst: No 2446-50 EB-III/PF 54 F.No 11 Dated 8/9/2012
Copy of the above is forwarded to the:-

1. District Account Officer Manshra.
2. ADO Circle Concerned.
3. In charge EMIS cell local office.
4. Teachers concerned.
5. Office order file.

[Signature]
DEPUTY DISTRICT OFFICER
(M) E&SE MANSEHRA

[Signature]
ATTESTED & ACCEPTED

[Signature]
Attested
Manshra

[Signature]

رجسٹر حاضر و مدرسین

بابت ماہ جون

نام: عبداللہ

عنوان: میٹر

BBST SPST

روز	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط
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قسم	وضع	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
انفاقیہ										
استحقاق										
بیماری										
میزان										

دستخط ہیڈ ماسٹر

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بابت ماہ مئی 2013ء

رجسٹر حاضرین مدرسین

نام: عبدالعظیم
 پتہ: س. پ. 51
 ماہ: مئی

تاریخ	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط
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12-03-13

قیمت	حالیہ	سابقہ	میزان	قال	سابقہ	میزان	حالیہ	سابقہ	میزان
قیمت	حالیہ	سابقہ	میزان	قال	سابقہ	میزان	حالیہ	سابقہ	میزان
افتتاحی									
استحقاقی									
بیماری									
میزان									

دستخط ہیڈ ماسٹر

Attested
 Main

رجسٹر حاضر و مدرسین GPS سنٹر آف

نام مدرسہ: سنٹر آف
 عہدہ: جوڈیسیل

تاریخ	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط
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11/4/13

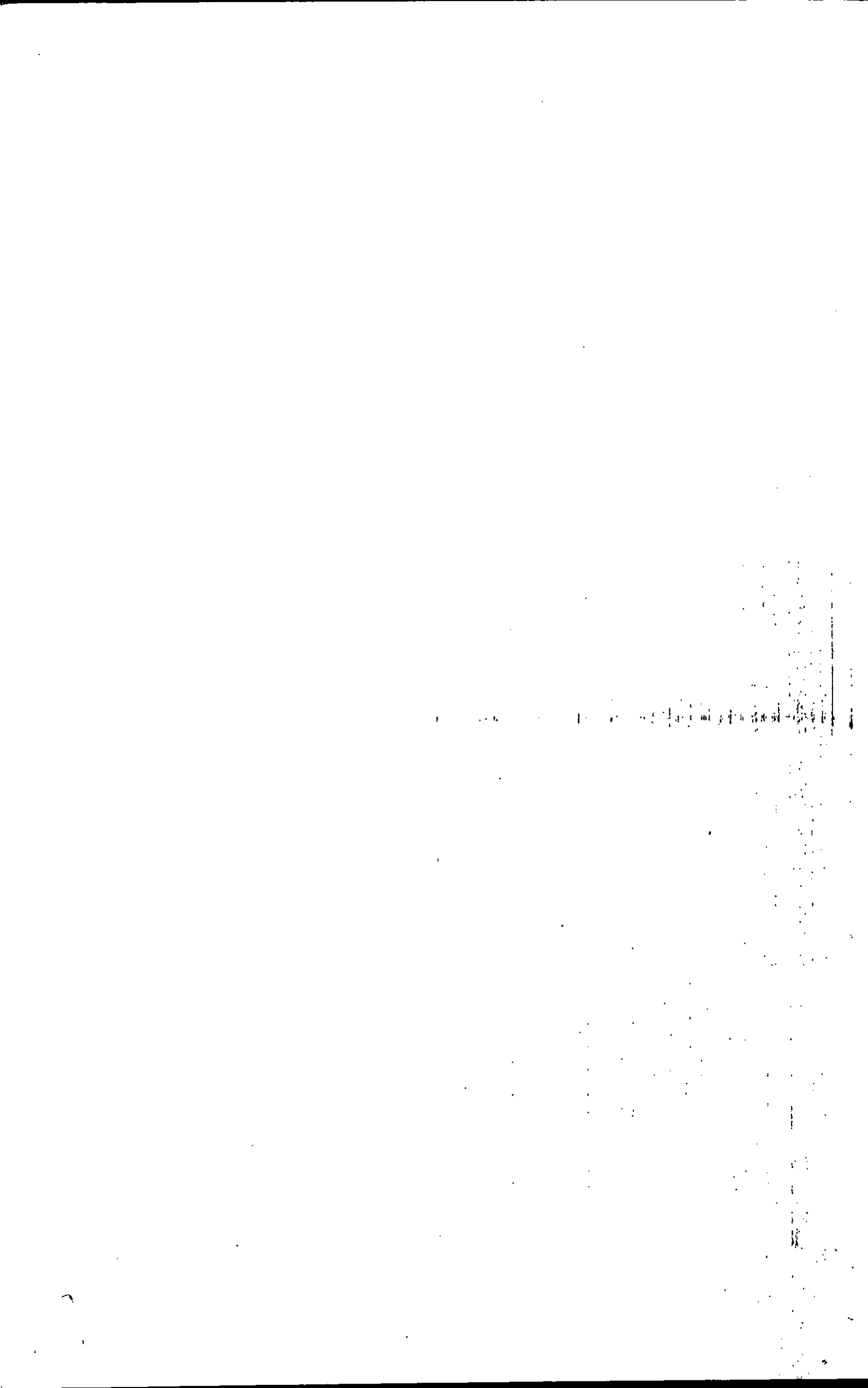
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 Circle
 11-4-2013

12/30/13 7/30

موضوع	حال	سابقہ	میزان	خال	سابقہ	میزان	حال	سابقہ	میزان
افتتاحی									
استحقاقی									
بیماری									
میزان									

دستخط: میرزا ناصر

Australia
 Land



رجسٹر حاضر و مدرسین
 بابت ماہ مارچ
 نام: محمد امجد
 عہدہ: چوہدری

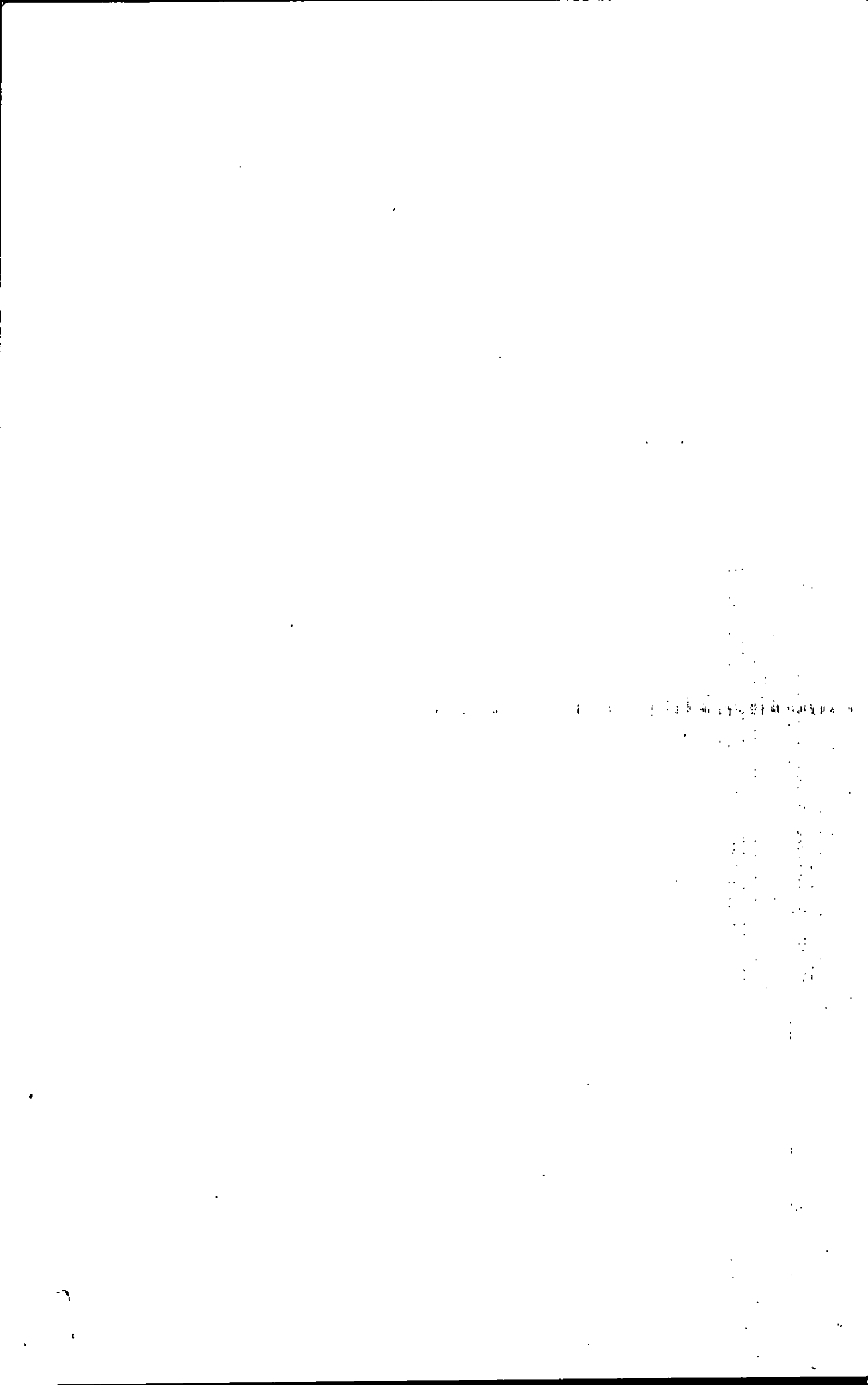
تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1	محمد امجد			محمد امجد					
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30	محمد امجد			محمد امجد					
31	محمد امجد			محمد امجد					

(Large handwritten signatures and scribbles across the table)

نمبر	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان
انفاقہ									
استحقاقی									
بیماری									
میزان									

دستخط ہیڈ ماسٹر

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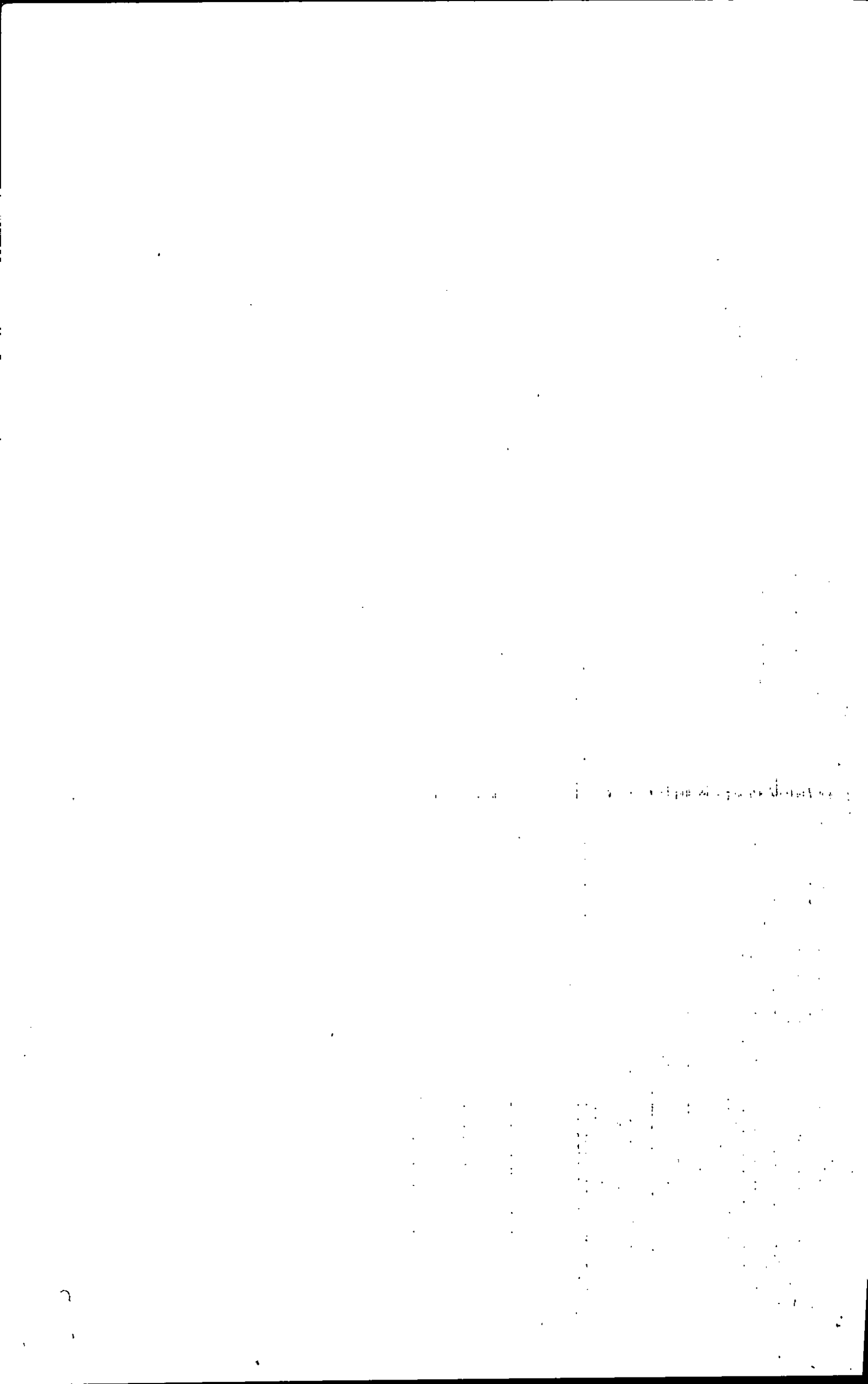
رجسٹر حاضر و مدرسین GPS	
بابت ماہ فروری ۲۰۱۳	
نام	عبدالاحد
عہدہ	جوگیدار

تاریخ	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	
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قسم و خدمت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
اتفاقیہ												
استحقاقی												
بیماری												
میزان												

دستخط ہیڈ ماسٹر

Attested
محمد



رجسٹر حاضر و مدرسین

بابت ماہ: ۴۲ روپی

نام: محمد الراجح

عمدہ: چوکنڈار

ہسٹری

GPS

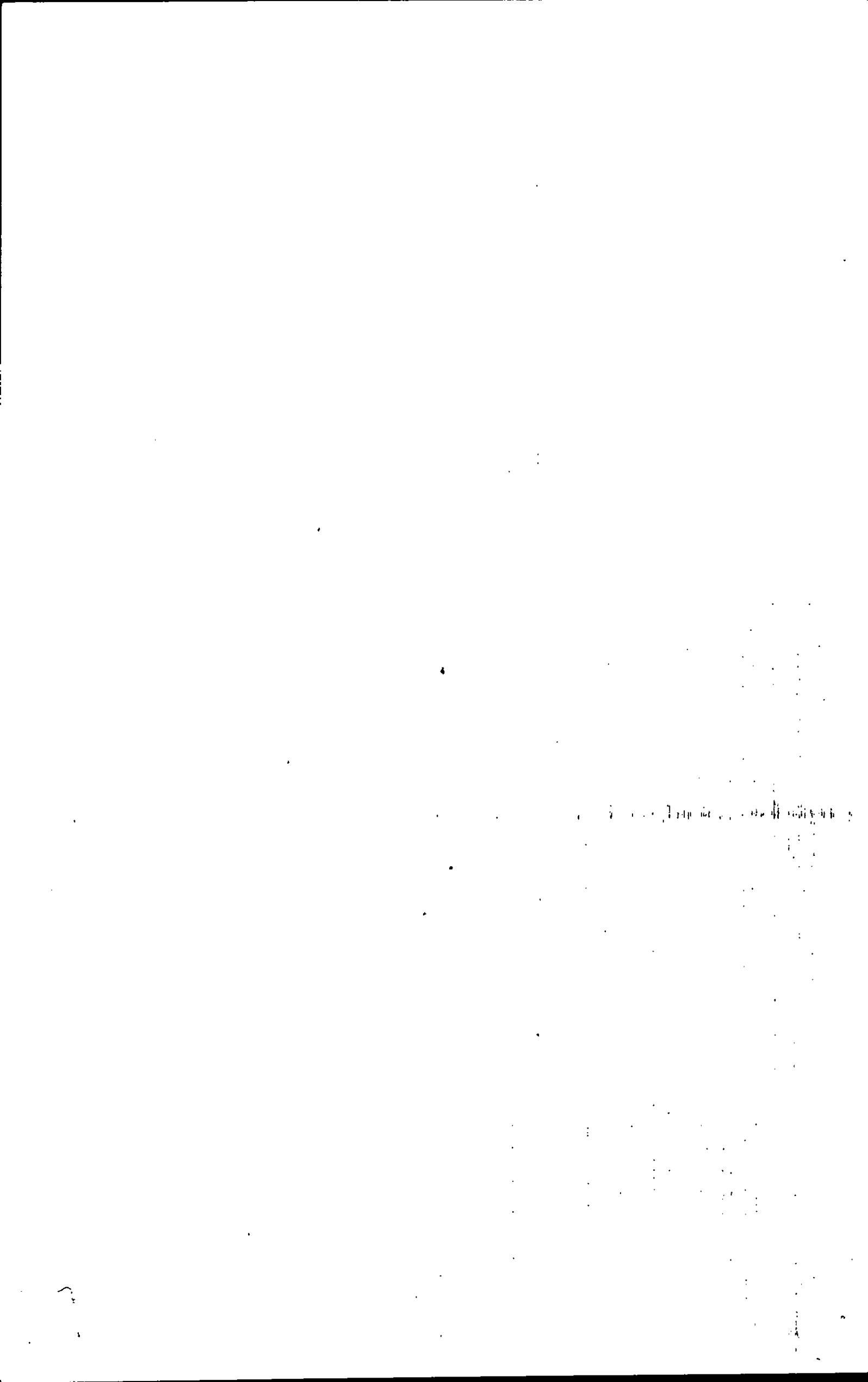
۲۰۱۳

تاریخ	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط
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موضوع	خال	سابقہ	میزان	خال	سابقہ	میزان	خال	سابقہ	میزان	خال	سابقہ	میزان
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دستخط ہیڈ ماسٹر

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رجسٹر حاضر و مدرسین GPS

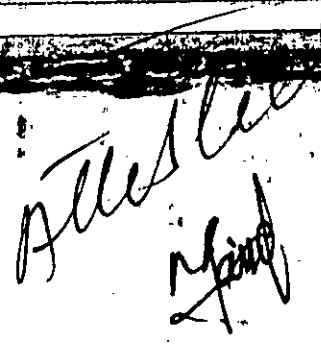
بابت ماہ دسمبر 2017ء

نام: عبدالحمید	عہدہ: چوگردار
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تاریخ	آمد	دستخط	روایتی	دستخط	آمد	دستخط	روایتی	دستخط	آمد	دستخط	روایتی	دستخط
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نمبر	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
رقم رضت									
اتفاقہ									
استحقاقی									
بیماری									
میزان									

دستخط ہیڈ ماسٹر


 Headmaster

رجسٹر حاضر و مدرسین
 بابت ماہ
 نومبر ۱۹۵۶

نام	ابو منصور حسین
عہدہ	مدرس

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
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نمبر	رضت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان

دستخط ہیڈ ماسٹر

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رجسٹر حاضر و مدرسین ۹۸۳ سید علی

نام	مکتوبہ صحنی	رقم درجہ	عبداللطیف
عہدہ	پرنسپل	اول مدرس	جوگندار

تاریخ	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط
1	منظور	منظور										
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قسم رخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
انقاریہ												
استحقاقی												
بیماری												
میزان												

دستخط ہیڈ ماسٹر

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9/9/2012

Small printed text, possibly a stamp or header.

Handwritten signature or initials.

Main body of handwritten text, appearing to be a list or series of notes.

Annexure E

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30

Annexure
'F'

197

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (MALE) MANSEHRA

CANCELLATION

The Order issued vide this Office Endst No 2446-50 Dated 8/9/2012 S.No (1-2) Namely Abdul Mujid Chaw:- S Manzoor Hussain Chaw is here by cancelled in the interest of public service with immediate effect.

Note:

- 1 Charge Report should be submitted to all concerned.
- 2 No TA/DA is allowed to any one.
- 3 Tenure will be intact of the above ~~PST~~ Chaw:-
- 4 ~~The Order should be implemented after the annual Exam.~~

-sd.

SUB DIVISIONAL EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No 585-88 GB III SDEO (M) File No _____ PF _____ Dated 25/2 2013.

Copy of the above is forwarded for information to the:

- 1 District Accounts Officer Mansehra.
- 2 ASDEO Circle Concerned.
- 3 In charge EMIS cell local office.
- 4 ~~Teachers~~ Chaw:- Concerned.
- 5 Office order file.

[Signature]

SUB DIVISIONAL EDUCATION OFFICER
(MALE) MANSEHRA

en a

*Attested
1/9/12*

پر سائل کو بروئے آرڈر نمبر 50-2446 مورخہ 08.09.2012،
مسمیٰ محمد منظور کی تحریر کے مطابق ای۔ ڈی۔ او صاحب نے گورنمنٹ
پرائمری سکول ہنگرائی میں ٹرانسفر کی اور مسمیٰ محمد منظور نے سائل کو باقاعدہ
معادہ بھی تحریر کر کے دیا۔ (نقل لف ہے)۔

(۵) یہ کہ بعد ازاں محمد منظور نے محکمہ اور سیاسی اثر و رسوخ استعمال کرتے ہوئے

میرے آرڈر نمبر 50-2446 کو مورخہ 25.02.2013 کو میرے علم
میں لائے بغیر اور شہنائی کا موقع دیئے بغیر کینسل کروا دیا جس کا مجھے مورخہ
18.06.2013 کو علم ہوا اور سائل نے محکمہ ایجوکیشن کے دفتر سے آرڈر
کی نقل حاصل کی۔ محکمہ نے بھی سائل کو اس سلسلے میں کوئی اطلاع نہیں دی۔

(۶) یہ کہ از روئے قانون و پالیسی ٹرانسفر آرڈر Tenure پورا کئے بغیر کینسل
نہیں کیا جاسکتا اب آرڈر میں Cancellation کی سرے سے کوئی
وجوہات تحریر ہی نہیں کی گئیں۔

(۷) یہ کہ سائل صرف 10 ماہ تک گورنمنٹ پرائمری سکول ہنگرائی میں تعینات رہا۔

(۸) یہ کہ اراضی مذکورہ بالا سائل کا واحد ذریعہ آمدن تھی جو کہ سائل نے سکول کے لئے
دے دی ہے جو کہ اس کے علاوہ اب سائل کا دیگر کوئی ذریعہ معاش نہ ہے۔

لہذا استدعا ہے کہ آرڈر نمبری 88-585 مورخہ 25.02.2013 کو
حسب ضابطہ کا عدم منسوخ فرمایا جا کر سائل کا آرڈر نمبری 50-2446
مورخہ 08.09.2012 بحال فرمایا جائے اور سائل کو گورنمنٹ پرائمری
سکول ہنگرائی میں بحال رکھا جائے۔

المرقوم 21.06.2013

عبد الماجد ولد غلام ربانی ساکن ہنگرائی تحصیل بالا کوٹ ضلع مانسہرہ حال
تعینات گورنمنٹ پرائمری سکول ہنگرائی تحصیل بالا کوٹ ضلع مانسہرہ..... سائل

[Handwritten Signature]

[Handwritten Signature]

وکالت نامہ

بعدالت جناب سرناہ سروس نہ بیرونل حیدر خٹوخواہ کسٹاؤر
عبدالمجید بنام PKD و ذریعہ
 دعویٰ یا جرم سروس اسٹیل منجانب اسٹیلٹ
 - باعث تحریر آنکہ

مندرجہ بالا عنوان میں اپنی طرف سے پیروی وجود ہی بمقام کسٹاؤر

دلدار احمد خان لغمانی ایڈووکیٹ سپریم کورٹ پاکستان

بدیں شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص رو برو عدالت حاضر ہوتا ہوں گا۔ اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دے کر حاضر کروں گا۔ اگر کسی پیشی پر منظر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ مقام کچہری کے کسی اور جگہ سماعت ہونے پر یا بروز کچہری کے اوقات کے آگے یا پیچھے ہونے پر منظر کو کوئی نقصان پہنچے تو ذمہ دار یا اس کے واسطے کسی معاوضہ ادا کرنے، بختیار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھے کل ساختہ پرداختہ صاحب مثل کردہ ذات خود منظور و قبول ہو گا۔ اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی دائر کرنے، نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہو گا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرانے کا ہر قسم بیان دینے اور سپرد تاشی و راضی نامہ و فیصلہ برخلاف کرنے و اقبال دعویٰ کا اختیار ہو گا اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا کٹرفند درخواست حکم استماعی یا ڈگری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا لگی علیحدہ پیروی بختیار نامہ کرنے کا مجاز ہو گا اور بصورت ضرورت اپیل اور اپیل کے واسطے کسی دوسرے وکیل یا ایئر سٹر کو بجائے اپنے ہمراہ مقرر کریں اور ایسے شیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو، پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پیروی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہو گا۔ لہذا اختیار نامہ لکھ دیا ہے کہ سند ہے۔

مضمون بختیار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

المرقوم 2017/09/10

ATTESTED & ACCEPTED

DILDAR AHMED KHAN LUGHMANI,
 Advocate Supreme Court,
 of Pakistan.

عبدالمجید
 [Signature]

گواہت باب 5 میں جو کہ عدالت میں سروس شروع کرنا ہے۔

DEO ایجوکیشن مالٹریہ وغیرہ۔

Be fixed at an early date

سروس میں

عدالت میں گواہت کے لیے درخواست گزار کو (Early Hearing) ذیل میں دیکھا جائے۔

یہ کہ اپیل عدالت عالیہ میں 9/10/13 کو عدالت میں داخل کی گئی ہے۔
جب میں تو ڈیڑھ گھنٹے کے لیے 14/4 کو عدالت میں حاضر ہوں گا۔

5/10/13

2- یہ کہ اپیل عدالت میں درخواست گزار (Suspention) کے لیے 25/10/13 کو عدالت میں داخل کی گئی ہے۔
Urgent Matter ہے۔

3- یہ کہ عدالت میں گواہت نہ فرمائی گئی تو اپیل کرنے کے لیے عدالت میں جاکر اپیل کرنے کے لیے درخواست دینی ہوگی۔

استدعا کے لیے عدالت میں طلب فرمائی جائے۔
Preliminary Hearing فرمایا جاوے گا۔

20/10/2013

امین

عدالت

بعدالت طب

صوبائی سروس ٹریبونل خیبر پختونخواہ
لکھنؤ

امیدوار

2013ء پنجاب

30 اکتوبر

مورخہ

مقدمہ عبدالمجید بنام SDO ایچ ڈی ایچ ڈی و غیرہ بنام

مقدمہ

دعویٰ

جرم

سروس ایچ ڈی ایچ ڈی نمبر 1398 سال 1398ھ

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام لکھنؤ کیلئے اعلیٰ عدالت ایچ ڈی ایچ ڈی و غیرہ کی طرف سے
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دینے جو اب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک در و پنیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زر این پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت
مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے
اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے
سبب سے و نہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں
گے۔ کہ پیروی مذکور کریں۔ لہذا کالت نامہ لکھدیا کہ سندر ہے۔

2013ء

30 اکتوبر

30

المرقوم

محمد
محمد
محمد

العبد محمد محمد العبد واہ العبد

کے لئے منظور ہے۔

مقام لکھنؤ

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

Abdul MajidAppellant

VERSUS

Sub-Divisional Education Officer Male
Mansehra etc.....Respondents.

SERVICE APPEAL


APPLICATION FOR ADJOURNMENT

Respectfully Sheweth!

- 0-17
17.01.15
1. That, the above-titled appeal is pending before this Honourable court which is fixed for today i.e. 19.01.2015.
 2. That, the undersigned is suffering from severe fever, headache and acute throat infection, therefore, unable to appear before this Honourable Court.

It is, therefore, most humbly prayed that the above-mentioned appeal may please be adjourned to some other date.

Dated 19.01.2015


DILDAR AHMED KHAN LUGHMANI,
Advocate Supreme Court,
Of Pakistan.
...Counsel for the appellant

**BEFORE THE SERVICE TRIBUNAL,
KPK PESHAWAR**

Abdul MajidAppellant

VERSUS

Sub-Divisional Education Officer (Male),
Mansehra etc.....Respondents

SERVICE APPEAL

APPLICATION FOR TEMPORARY INJUNCTION ETC.


INDEX

S#	Particulars of documents	Annexure	Pages
1	Memo of application for temporary injunction.	1-3
2	Copy of order No.943-47 dated 03.03.2014.	"A"	4
3	Copy of order No.2574-77 dated 14.03.2014.	"B"	5

Dated 05.10.2013

Abdul Majid
...Appellant

Through


DILDAR AHMED KHAN LUGHMANI,
Advocate Supreme Court,
Of Pakistan.

①

**BEFORE THE SERVICE TRIBUNAL,
KPK PESHAWAR**

Abdul MajidAppellant

VERSUS

Sub-Divisional Education Officer (Male),
Mansehra etc.....Respondents

SERVICE APPEAL

**APPLICATION FOR GRANT OF
TEMPORARY INJUNCTION TO THE
EFFECT THAT THE RESPONDENTS
MAY PLEASE BE RESTRAINED TO
RECALL THE OFFICE ORDER NO.943-
47/AE-I DATED 03.03.2014 OR PASS
ANY OTHER TRANSFER ORDER
AGAINST THE PETITIONER AND FOR
SUSPENSION OF THE OFFICE ORDER
NO.2574-77 DATED 14.03.2014 TILL THE
DISPOSAL OF THE ABOVE-TITLED
APPEAL.**

Respectfully Sheweth!

1. That, the above-titled appeal is pending before this august court and is fixed for today.

2. That, during the pendency of the appeal, District Education Officer (Female), Manshra passed the transfer order of the appellant bearing No.943-47 dated 03.03.2014 whereby appellant was transferred/adjusted from GGPS Reen to GPS Hungrayee against vacant post. (Copy of the order is attached as annexure "A").
3. That, respondent No.1 passed another order bearing No.2222-25 dated 28.02.2014 whereby one Manzoor Hussain was transferred from GPS Hungrayee to GMS Hungrayee but later on respondent No.1 in collusion with other respondents and Manzoor Hussain passed the office order No.2574-77 dated 14.03.2014 whereby the above-mentioned order was cancelled. *(Copy of the order is annexed as annexure "B")*.
4. That, now the respondents are intending to cancel the office order No.943-47 dated 03.03.2014.
5. That, the appellant has a prima facie case and there is every hope of its success.
6. That, the balance of convenience also lies in favour of the appellant.
7. That, if the temporary injunction has not been granted the operation of order mentioned in the heading of instant application has not been

suspended, appellant would suffer an irreparable loss.

It is, therefore, most humbly requested that temporary injunction as mentioned in the heading of instant application may please be granted and operation of order No.2574-77 dated 14.03.2014 may please be suspended and respondents may please be restrained to recall the office order No.943-47 dated 03.03.2014 till the disposal of above-titled appeal.

Dated 17.03.2014

Abdul Majid
...Appellant

Through

DILDAR AHMED KHAN LUGHMANI,
Advocate Supreme Court,
Of Pakistan.

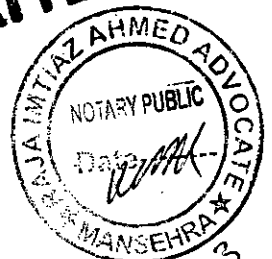
AFFIDAVIT.

I, Abdul Majid son of Ghulam Rabbani presently posted at Government Primary School Hungrayee, Tehsil Balakot District Mansehra, 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 nothing has been concealed from this Honourable Court.

Dated 17.03.2014

Abdul Majid
(DEPONENT)

ATTESTED



17/3/14

OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE MANSEHRA.

④

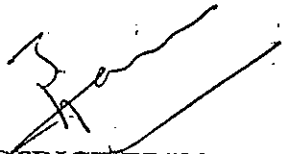
TRANSFER/ADJUSTMENT:-

Mr. Abdul Majid Chowkidar GGPS Reen is hereby adjusted/transferred to GPS Hangai against vacant post on hir own pay and grade in the interest of public service with effect from the date of taking over charge.

"A"

Note:- 1. Charge reports should be submitted to all concerned.

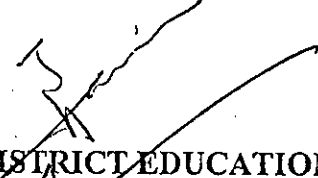
2. No TA/DA is allowed.


DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA.

Endst:No 943-47 / AE-1 Dated Mansehra the 3/08/ 2014.

Copy to the:-

1. District Education Officer (Male) Mansehra.
2. District Accounts Officer Mansehra.
3. Sub Divisional Education Officer (M & F) Mansehra.
4. ASDEO Circle concerned.
5. Office order file.


DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA.

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

⑤
"B"

CANCELLATION.

As approved by the competent authority this Office Endst: No 2222-25 dated 28/02/2014 is here by cancelled in r/o Mr. Manzoor Hussian in the interest of public service with immediate effect.

Note:

1. No TADA is allowed.
2. Charge report should be submitted to all concerned.

Sd/-
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No 2574-77 Dated 14/3 2014.

Copy for information to the:

1. District Accounts Officer Manshra.
2. ASDEO (Male) Circle Concerned.
3. Teacher Concerned.
4. Office Order file.


DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

حاضرہ رپورٹ

سٹر عبدالملاحد چوکیدار کو آمدہ افس آرڈر
 انڈوز نمبر $\frac{943-47}{03-03-2014}$ ڈی.ای.او. صاحب (زنائز)
 مانسہرہ کیمپابن گورنمنٹ گزٹ پرائمری سکول میں سے
 سے تبدیل کرنا گورنمنٹ پوائنٹ پرائمری سکول پنڈرائی
 میں خالی اسامی پر تعینات کیا گیا ہے۔ مذکورہ چوکیدار
 نے آج مورف $\frac{04/03}{2014}$ کو گورنمنٹ پوائنٹ پرائمری سکول
 پنڈرائی میں سے قبل از دوہیر حاضرہ کر دی ہے۔ اور اپنے
 عہدے پر خارج ہوا ہے۔
 لہذا حاضرہ رپورٹ ارسال خدمت ہے۔

Abroad of 4/3/14

Head Teacher
Govt. Primary School
Hansral

(7)

ریگنڈ

لاہور کی کیمپلیٹنگ ایجنسی کے ذریعہ جو کہ گورنمنٹ ٹیچنگ
ڈپارٹمنٹ کے اسکول میں جو کہ گورنمنٹ ٹیچنگ کے مطابق ٹرانسفر آرڈر

943-47/AE/C 2014-03-03 کے تحت آج حوالہ

2014-03-04 کو اسکول پر اسے مارا گیا جاتا ہے۔

تاکہ وہ اپنے نئے اسکول میں جا سکیں۔

S.P.H.T گورنمنٹ ٹیچنگ
اسکول میں سرکل ٹیچنگ

Shahide
Head Teacher
G.G.P. S Reen

BEFORE THE SERVICE TRIBUNAL KHAYBER PAKHTUNKHAWA PESHAWAR.

Abdul Majid s/o Ghulam Rabbani Class IV GGPS Hungrayee Tehsil Balakot District
Mansehra.

.....Appellant.

Versus

Sub Divisional Education Officer Male Mansehra etc:Respondents.

Service appeal.

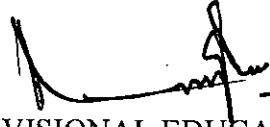
Replication of temporary Injunction on behalf of respondents No. 1 to 3.

Respectfully Sheweth:-

1. Para No.1 is correct.
2. Para No.2 is correct to the extent that transfer order of the appellant bearing No. 943-47 dated. 3-3-2014 was passed during the pendency of appeal by the D.E.O. (F) (who is not a partee in the instant Case) and not by D.E.O. (M) where by the appellant was transferred/ Adjusted from GGPS Reen to GPS Hungrayee. Further the application of appellant is mis; joinder, non joinder of necessary partee.
3. Para No.3 is correct up to the extent that respondent No.1 passed the order bearing No.2222-25 dated 28-02-2014 whereby Mr. Manzoor Hussain was transferred from GPS Hungrayee to GMS Hungrayee as the respondent Manzoor Hussain Chowkidar is an old/ Sick man and cannot perform his duties at GGPS Rean being a for flung and hilly area.
4. Para No.4 is irrelevant, related to the office of the D.E.O. (Female), hence no comments.
5. Para No.5 is incorrect; the appellant has no Prima facie case.
6. Para No.6 is incorrect.
7. Para No.7 is incorrect, misguiding and revealing malafide intention.

Prayer:-

It is therefore humbly prayed that the application of appellant for temporary injunction may graciously be dismissed.



SUB DIVISIONAL EDUCATION OFFICER
MALE MANSEHRA.

'C'

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&SE) MANSEHRA

ORDER

Consequent upon the approval of the competent authority the adjustment on vacant post in the following PST's are hereby made on their own pay and grade in the interest of public service:

S.No	Name of Teacher	From	To	Remarks
1	Abdull Majid chaw.	S.P.S. Reen	To S.P.S. Hangori	V. 2
2	Munzoor Hussain chaw.	S.P.S. Hangori	To S.P.S. Reen	V. 1
3	M. Naseem chaw.	S.P.S. Bari midam	To S.P.S. Bari	V. 4
4	M. Banaras chaw.	S.P.S. Bari	To S.P.S. Bari midam	V. 3
5	/	/	/	/
6	/	/	/	/

- Note:-
1. Charge Report should be submitted to all concerned.
 2. No TA/DA is allowed to any one.
 3. Tenure of the above said Teachers will be remain intact, no any break of their normal tenure.

Sd/
EXECUTIVE DISTRICT OFFICER
(E&SE) MANSEHRA

Encls: No 2446-50 EB-III/PF 54 F.No 11 Dated 17/9/2012
Copy of the above is forwarded to the:-

1. District Account Officer Manshra.
2. ADO Circle Concerned.
3. In charge EMIS cell local office.
4. Teachers concerned.
5. Office order file.

[Signature]
DEPUTY DISTRICT OFFICER
(M) E&SE MANSEHRA

9

[Handwritten marks]

[Handwritten marks]

30

Annexure
'F'

197

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (MALE) MANSEHRA

CANCELLATION

The Order issued vide this Office Endst No 2446-50 Dated 8/9/2012 S.No (1-2) Namely Abdul Mujid Chawri - Manzoor Hussain Chawri is here by cancelled in the interest of public service with immediate effect.

Note:

- 1 Charge Report should be submitted to all concerned.
- 2 No TA/DA is allowed to any one.
- 3 Tenure will be intact of the above ~~EST~~ Chawri
- 4 ~~The Order should be implemented after the annual Exam.~~

Sd.
SUB DIVISIONAL EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No 585-88 GB III SDEO (M) File No PF - Dated 25/2 2013.

Copy of the above is forwarded for information to the:

- 1 District Accounts Officer Mansehra.
- 2 ASDEO Circle Concerned.
- 3 In charge EMIS cell local office.
- 4 ~~Teachers~~ ^{Chawri} Concerned.
- 5 Office order file.

[Signature]
SUB DIVISIONAL EDUCATION OFFICER
(MALE) MANSEHRA

[Handwritten initials]

44

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (MALE) MANSEHRA

ORDER

As approved by the competent authority Mr. Manzoor Hussian Chowkidar GPS Hangari is here by adjusted at GMS Hangari against vacant post in the interest of public service with immediate effect.

Note:

1. No TA/DA is allowed.
2. Charge report should be submitted to all concerned.

Sd/-
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No 2222-25

Dated 28/2/2014.

Copy for information to the:

1. District Accounts Officer Mansehra.
2. ASDEO (Male) Circle Concerned.
3. Teacher Concerned.
4. Office Order file.

DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

o/c

*approved &
issue*

OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE MANSEHRA.

(4)


TRANSFER/ADJUSTMENT:-

Mr. Abdul Majid Chowkidar GGPS Reen is hereby adjusted/transferred to GPS Hangai against vacant post on hir own pay and grade in the interest of public service with effect from the date of taking over charge.

"A"

Note:- 1. Charge reports should be submitted to all concerned.


2. No TA/DA is allowed.


DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA.

Endst:No 943-47 1A/2 Dated Manshra the 8/08/ 2014.

Copy to the:-

1. District Education Officer (Male) Manshra.
2. District Accounts Officer Manshra.
3. Sub Divisional Education Officer (M & F) Manshra.
4. ASDEO Circle concerned.
5. Office order file.


DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA.

DISTRICT EDUCATION OFFICER
(MALE) MANSHEIRA

- Copy for information to the:
1. District Accounts Officer Mansheira.
 2. ASDFO (Male) Circle Concerned.
 3. Teacher Concerned.
 4. Office Order file.

Dated 14/3/2014

Sd/-
DISTRICT EDUCATION OFFICER
(MALE) MANSHEIRA

- Note:
1. No TA/DA is allowed.
 2. Charge report should be submitted to all concerned.

As approved by the competent authority this Office Endst. No 2222-25 dated 28/02/2014 is hereby cancelled in r/o Mr. Manzoor Hussain in the interest of public service with immediate effect.

CANCELLATION

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSHEIRA

cc B...

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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

CANCELLATION

Office Order issued vide this office Endst: No 943-47/AE-I dated 03.03.2014 is hereby cancelled and Mr. Abdul Majid Chowkidar GGPS Reen is directed to work at GGPS Reen in the interest of public service with immediate effect.

NOTE:-

1. Charge Report should be submitted to all concerned.
2. No TA/DA is allowed.

sd/-
DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA.

Endst: No 1769-73 /AE-I dated Mansehra the 31/3/14 /2014.

Copy to the:-

1. District Account office Mansehra.
2. District Education officer (Male) Mansehra.
3. Sub: Divisional Education officer (M/F) Mansehra.
4. Officials concerned.
5. Office order file.

[Signature]
DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA.

بعدالت جناب چیئرمین صوبائی سروس ٹرانسپورٹل KPK پشاور کیمپ کورٹ ایبٹ آباد

عبدالماجد بنام ڈسٹرکٹ ایجوکیشن آفیسر وغیرہ

سروس اپیل

جناب عالی!

- 1- یہ کہ اپیل عنوان بالا زیر تجویز عدالت آنجناب ہے جس میں آج تاریخ پیشی برائے جواب الجواب مقرر ہے۔
- 2- یہ کہ رسپانڈنٹس نے اپیلانٹ کے حقوق کو تسلیم کرتے ہوئے اپیلانٹ / سائل کو گورنمنٹ پرائمری سکول ہنگراہنی میں ٹرانسفر کر کے تعینات کر دیا ہے۔ اور اپیلانٹ / سائل اپنی ڈیوٹی سکول مذکورہ میں ہی دے رہا ہے۔ اس طرح سائل / اپیلانٹ حق رسید ہو چکا ہے۔ اور اپیل عنوان میں مزید کارروائی جاری رکھنے کا خواہ نہ ہے۔ اور اگر ضرورت پڑی تو سائل / اپیلانٹ اپیل عنوان کو دوبارہ کورٹ سے رجوع کر سکتا ہے۔

لہذا استدعا ہے کہ اپیل عنوان بالا کو بصیغہ دستبرداری بلا مزید کارروائی داخل دفتر فرمایا جاوے۔

المرقوم: 16-03-2015

عبدالماجد

اپیلانٹ / سائل

(Handwritten signature)



OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE MANSEHRA

RESTORATION.

Office order issued vide this office Endst: No.943-47/AE-I dated 03.03.2014 in respect of Abdul Majid Chowkidar is hereby restored in the interest of public service with immediate effect.

**DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA**

Endst: No. 3773-78/AE-47(F)

Dated Manshra the 7/7/2014

Copy of the above is forwarded for information to the:-

1. District Education Officer (Male) Manshra.
2. District Accounts Officer Manshra.
3. Sub Divisional Education Officer (M/F) Manshra.
4. Officials concerned.
5. Office File.

**DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA**

[Handwritten signature]
07/07

16/3/15
کوریس
کوریس

منہ لیا
کوریس
کوریس
کوریس
کوریس

[Handwritten signature]

**Asst. Sub Divisional
Education Officer (Male)
Circle Kaghan**

ماہنامہ لاہور

عبدالغفور صاحب
317-78
7-7-2016
317/114

پتہ لاہور

لاہور

317/114

Handwritten signature

Additional Officer (Male)
Circle Kaghan

12/18/78

Dear Mr. [Name]

Enclosed for you are

two copies of the report

dated 12/18/78.

Very truly yours,

[Signature]

[Name]

[Address]

[City, State, Zip]

cc: [Name]

Director (Rural)
Kashan

[Signature]

[Signature]