


FORM OF ORDER SHEET

Court of _____

Appeal No. 1791/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/09/2023	<p>The appeal of Mr. Afraiz Ahmad received today by registered post through Mr. Shahzad Shakoor Advocate. It is fixed for preliminary hearing before touring Single Bench at A. Abad on</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

Court Copy

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No: 1791 of 2023

Afraiz Ahmed S/O Karam Elahi PSHT, GPS Dhaka Malkot, Circle
(Berote) Abbottabad.

Appellant

Versus

The Director, Directorate of Elementary & Secondary Education
Department, Peshawar and others.

Respondents

SERVICE APPEAL

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Dated 02/09/2023

(Rashid Iqbal Khan Jadoon)
Advocate IBC Islamabad
Attorney Abbottabad.

(Afraiz Ahmed)
Appellant Through

(Shahzad Shakoor)
Advocate High Court Abbottabad

(Muhammad Qasim Mir)
Advocate Abbottabad.

Abbott Law Chamber

Office No 6, Ground Floor, Ayub Tanoli lawyer plaza
Abbottabad. 0333-5025002, 0316-9343818

(1)

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.**

Service Appeal No: 1791 of 2023

Afraiz Ahmed S/O Karam Elahi PSHT, GPS Dhaka Malkot, Circle
(Berote) Abbottabad.

Appellant

Versus

- 1 The Director, Directorate of Elementary & Secondary Education Department, Peshawar.
- 2 The District Education Officer, Elementary & Secondary Education Department, Abbottabad.
- 3 Sohail Mehmood PSHT GPS Baccha Sanal, Now PET, GMS Thathi Ahmad Khan Abbottabad.
- 4 Imtiaz Ur Rehman PSHT GPS Narwara, Now PET, GMS Malkot Abbottabad.

Respondents

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974, AGAINST THE OFFICE ORDER DATED 11/05/2023, ISSUED BY THE RESPONDENT NO 2 (DEO (M) ABBOTTABAD) UNDER ENDORSEMENT NO 3165-74, TO THE EXTENT OF PSHT TO PET (RESPONDENTS NO 03 AND 04, THE JUNIORS OF APPELLANT).

PRAER:-

ON ACCEPTANCE OF INSTANT SERVICE APPEAL, OFFICE ORDER DATED 11/05/2023 ISSUED BY THE RESPONDENT NO 2 (DEO (M) ABBOTTABAD) UNDER ENDORSEMENT NO 3165-74, TO THE EXTENT OF PSHT TO PET RESPONDENTS NO 03 AND 04 MAY PLEASE BE SET ASIDE AND RESPONDENTS MAY PLEASE BE DIRECTED TO ISSUE PROMOTION ORDER OF APPELLANT AS PET WITH EFFECT FROM 11/05/2023, ON SENIORITY BASIS AND GRANT OF CONSEQUENTIAL BENEFITS/ PROMOTION (BACK BENEFITS ETC).

Respectfully Sheweth,

2

FACTS

- 1) That appellant joined Elementary & Secondary Education Department as a PST on 16/05/2005 and presently he is working in the capacity of PSHT. Copy of appointment Order is annexed as Annexure "A"
- 2) That appellant during his service, promoted from the post of PST to SPST in BPS 14, on the basis of seniority cum fitness through promotion order dated 02/10/2017. Copy of promotion order dated 02/10/2017 is annexed as Annexure "B".
- 3) That similarly appellant was further promoted as SPHT in BPS 15 on 07/03/2020 and he is working in same capacity in his present station. Copy of Order dated 07/03/2020 is annexed as Annexure "C"
- 4) That appellant passed his higher professional qualification, MSc HPE (Health & Physical Education) on 07/03/2023, for the post of PET(Physical Education Teacher). Copy of degree is annexed as Annexure "D"
- 5) That on 12/04/2023, respondent No 02, wrote a letter to SDEO Abbottabad, wherein invited documents for promotion on seniority cum fitness, including appellant's cadre, PSHT etc to PET, and appellant was informed/directed through his circle officer (ADEO) for submission of required documents, appellant submitted his personal file for promotion. Copy of letter dated 12/04/2023 is annexed as Annexure "E"
- 6) That when it came in to the knowledge of appellant that promotion orders have been issued on 11/05/2023, and it found that his two most juniors (respondents No 3 & 4) of appellant have promoted to the PET post by superseding the appellant. Copy of Promotion Order is annexed as Annexure "F"

7) That under the above circumstances, appellant submitted his departmental appeal on 24/05/2023 to the respondent no 1 through registered post, which is not decided yet with in the statutory period of 90 days, Consequently this appeal is being filed with time of 120 days of submission of his departmental appeal Copy of Departmental Appeal along with registered receipt, is annexed as Annexure "G" Hence this appeal inters-alia on the following ground.

Grounds

- a) That the seniority position of appellant and his juniors is quite clear, appellant joined his service on 16/05/2005, and seniority No is 506 in present seniority list while his both juniors joined his service on 21/12/2010, and their seniority nos are 619 & 625 in present seniority list, but during the preparation of working papers, respondents did not took any trouble to examine the case properly, and committed misreading and non-reading the relevant law and facts.
- b) That later appellant got information from the office of respondent No 02 and it found that appellant, being higher professional qualified (MSc HPE) for the post of PET, and minimum professional qualification is JDP (Junior Diploma of Physical), under the law higher qualification could not be treated ineligibility, such act of respondent No 2 is highly arbitrary and colourable fashion, has not only defeated & frustrated the Constitutional guarantees, available to the appellant, but also has exhibited naked disregard to the principles of fair play, and rule of law.
- c) That it is undoubted facts that respondents illegally snatched the legal rights of the appellant in an uncivilized

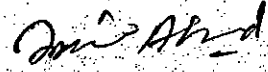
way in a very haste manner, which is against the equity and there is no single example is available in the civilized society.


- d) That during the preparation of working papers, concerned officers/officials have totally ignored the legal position of promotion in respect of appellant, and totally side tracked the lawful position and wrongly ignored the appellant in impugned promotion order.
- e) That the impugned action of non considering of seniority position of appellant, by respondents is apparent activity of serious disapproval of the law as settled by the Courts of Law, which is beyond the jurisdiction of respondents and tried to create self made complications.
- f) That appellant is dragged into litigation, the conduct of the respondents is admittedly arbitrary capricious unjust and against all norms of justice and as such requires indulgence of this Honourable Court by awarding appropriate Cost to the respondents.
- g) That respondents ignored the provisions of Article 4 and 25 of the Constitution of Pakistan while exercising their illegal impugned office order and their exercising discretionary powers in refusing the relief to the appellant.

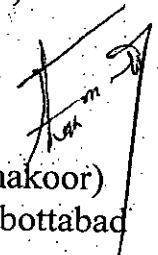
It is, therefore, respectfully prayed that on acceptance of instant service appeal, office order dated 11/05/2023 issued by the respondent no 2 (DEO (M) Abbottabad) under Endorsement no 3165-74, to the extent of PSHT to PET respondents no 03 and 04 may please be set aside and respondents may please be directed to issue promotion order of appellant as PET with effect from 11/05/2023, on seniority basis and grant of consequential benefits/ promotion (back benefits etc).


Any other relief for which the appellant is entitled, and the same is not asked/prayed specifically, may very kindly be granted in favour of the appellant.

Dated 02/09/2023


(Afraiz Ahmed)
Appellant


Through
(Rashid Iqbal Khan Jadoon)
Advocate IBC Islamabad
Attorney Abbottabad.


(Shahzad Shakoor)
Advocate High Court Abbottabad

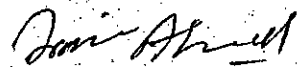

(Muhammad Qasim Mir)
Advocate Abbottabad.

Abbott Law Chamber
Office No 6, Ground Floor, Ayub Tanoli lawyer plaza
Abbottabad. 0333-5025002, 0316-9343818

AFFIDAVIT

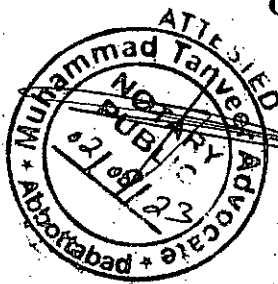
I, Afraiz Ahmed S/O Karam Elahi PSHT, GPS Dhaka Malkot, Circle (Berote) Abbottabad, do here by affirm on oath that contents of instant appeal is correct and true according to my best knowledge and belief and nothing has been suppressed from this Honourable Tribunal and this instant appeal is first appeal & same nature of any other appeal is not pending before Honourable Tribunal.

Dated 02/09/2023


(Afraiz Ahmed)
Appellant

CNIC No 13101-0863861-9

DEPONENT



(6)

Annexure A,

OFFICE OF THE DISTRICT COORDINATION OFFICER DISTRICT ABBOTTABAD

ORDER

The District Government Abbottabad is pleased to appoint the following candidates as PTC (MALE) teacher in BPS-7 on Contract Basis @ Rs. 2220-120-5820 (in case of F.A/F.Sc IInd Divn: in BPS-9 @ Rs. 2410-145-6760) plus usual allowances as admissible under the rules for a period of Two Years and posted in the schools as noted against each their names with effect from the date of taking over charge subject to the terms and conditions mentioned below:-

UNION COUNCIL WISE (ON CONTRACT BASIS)

U/C NAMLI MAIRA

1/81	51.41	S.Rashid S/O S.Ramzan R/O Bandi Maira	GPS Danna Tarada	Ag.vacant PTC post
2/89	50.20	Zakir S/O Ali Zaman R/O Bandi Maira	GPS Gali Bagla	-do-
3/337	49.88	Majid Sultan S/O Mohd Sultan R/O Namli Maira	GPS Golaga	-do-

U/C NAMMAL

1/529	51.96	Mohd Sabeer S/O Mohd Ayub R/O Nammal	GPS Tarhatti	Ag.vacant PTC post
2/525	35.82	Mohd Naheem Abbasi S/O Abdul Latif R/O Majuhan	GPS Jabri Kurli	-do-
3/763	35.81	Shamraz S/O Mohd Akbar R/O Majhoth	GPS Majhoth	-do-
4/796	34.02	Abdul Ghaffar S/O Mohd Khizar R/O Bandian	GPS Akhora	-do-
5/567	32.62	Waqar Ahmed S/O Afrisayab Khan R/O Vill: Majuhan	GPS Beri Bagla	-do-
6/610	31.27	Mohd Zariab S/O Mohd Zorab Khan R/O Vill: Bandian	GPS Langa Looth	-do-
7/411	27.83	Tanveer Ahmed S/O Mahroof Ahmed R/O Vill: Tarrach	GPS Thallah	-do-



پیش ڈسکاؤٹ

نزد و گری کالج بوائز ایبٹ آباد

IMPRESSIONS: 1/8/10

Handwritten signature and stamp at the bottom right of the page.

U/C BAKOT

1/240	50.85	Mohd Mehtab S/O Mushtaq Ahmed R/o Badala	GMPS Lower Sangal	Ag. vacant PTC post
2/586	47.89	Ittikhar Ahmed S/O Mohd Yaqub R/o Khan Kalan	GMPS Kokalian	-do-
3/778	47.50	Aurangzeb S/O Mohd Muskeen R/o Dakhan	GPS Dakhan Moolia	-do-
4/812	45.96	Majid Hussain S/O Sajjad Shah R/o Sangal	GPS Leeran Sydan	-do-
5/585	45.85	Aurangzeb S/O Habibur Rehman R/o Seri Khan Kalan	GPS Danna Khan Kalan	-do-
6/241	45.36	Liaqat Ali S/O Mohd Zarib R/o Badala	GMPS Dherian Moolia	-do-
7/32	42.92	Mohd Shoaib S/O Gul Zaman R/o Danna Khan Kalan	GPS Danna Khan Kalan	-do-
8/779	36.98	Mohd Almas S/O Nasir Ahmed R/o Khan Kalan	GPS Aliabad	-do-
9/743	34.16	Javed Iqbal S/O Mu Abdullah R/o Nakkur Pakhu	GPS Marhatti	-do-
10/587	33.70	Saghir Ahmed S/O Mohd Yaqub R/o Bakote	GPS Dakhan Moolia	-do-

U/C BEEROTE

1/375	42.83	Abdul Karim S/O Mohd Farid R/o Lahoor	GPS Sangruri	Ag. vacant PTC post
2/609	33.25	M. Sparas S/O Mohd Idris R/o Lower Birote	GPS Mawan-de-Hill	-do-
3/772	27.65	Mehraj Mohd Khan S/O Abdul Ghufoor R/o Birote	GPS Kokalian	-do-

U/C PALAK

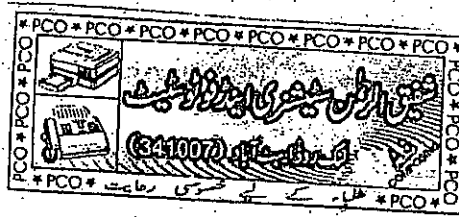
1/504	33.71	M. Wassem Ahmed S/O Mohd Saleem R/o Palak	GPS Bagla	Ag. vacant PTC post
2/667	32.65	Afraiz Ahmed S/O Karam Ellahi R/o Palak Khairpur	GPS Andar Kot	-do-

U/C LORA

1/59	46.38	Amjad Ali Shah S/O Mehmood Shah R/o Ghjora	GPS Garhi	Ag. vacant PTC post
2/25	40.47	Mohd Ibrahim S/O Hanif Khan R/o Dheri Kiata, Lora	GPS Seri	-do-



Amir Ahmad



8

U/C BEERAN GALI

1/129	49.83	Zulfiqar Ahmed S/O Mohd Ishaq R/O Vill: Jhaffar	GPS Jogimar	Ag: vacant PTC post
2/144	46.61	Ajmal Khan S/O Ghulam Hassan R/O Vill: Jhaffar	GPS Tahrat	-do-
3/90	44.54	Ahmed Nawaz S/O Mohd Gulzar R/O Moh: Khaiteer, Beerangali	GPS L/Beerangali	-do-
4/239	37.04	Mohd Irshad S/O Mohd Yousaf R/O Vill: Jhaffar	GPS Akhreela	-do-
5/806	30.85	Amjad Hussain S/O Abdul Hanan R/O Vill: Beerangali	GPS Bagla	-do-

U/C BANDI ATTAI KHAN

1/173	49.21	Mohd Amin S/O Wazir Ahmed R/O Bandi Attai Khan	GPS Darra	Ag: vacant PTC post
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U/C NAGRI BALA

1/553	50.12	Shaukat Hayat S/O Mohd Yaqub R/O Vill: Nagri Bala	GPS S/Akhrota	Ag: vacant PTC post
2/417	49.49	Mohd Saecd S/O Mohd Akram R/O Vill: Nagri Bala	GPS S/Akhrota	-do-
3/418	49.45	Mohd Asghar S/O Mohd Hassan R/O Vill: Nagri Bala	GPS Tupla Secr. Ag: Open Merit Seat	-do-

U/C CHAMHAD

1/312	48.16	Khalid Mehmood S/O Rustam Khan R/O Chamhad	GPS Buch Gali	Ag: vacant PTC post
2/661	47.85	Chanzeb Khan S/O Arangzeb R/O Chamhad	GPS Chamhad	-do-

TERMS AND CONDITIONS

1. They will sign the Agreement Form before joining service.
2. The candidates will enter into an Agreement with the Govt./Department and will be governed by the terms and conditions hereinafter mentioned in such agreement.
3. Their salary is subject to execution of Agreement deed based on the terms and conditions of the contract through EDO (S/L) Abbottabad as per Govt. rules and regulation.
4. They will get initial of the scale including usual allowances as admissible under the rules. They are entitled to annual increment as per rules.
5. The Dy: Dist: Officer (M/P) A. Abad should obtain Security Bond as well as Agreement Bond executed by each candidate to obey contract policy and will have not right to challenge they policy in any Court of Law.
6. The services will be considered as per rules and regulation laid by the Govt. of N-W.F.P.
7. Their services are liable to be terminated on one month's prior notice from either side. In case of resignation without prior notice their one month pay/allowances, if any shall be forfeited in favour of Govt.
8. Contribution of G.P. Fund will be as per rules and regulation of Govt. of N-W.F.P.

Shafiq-ur-Rehman

341007
SHAFIQ-UR-REHMAN

Stationery, Photostat & PCO
Link Road, Near No. 1 Govt. Coll.

7/14/2007

- 7
9. The appointees should join their post with immediate effect.
 10. The services can be terminated at any time if their performance is found unsatisfactory and they will be proceeded against under the removal from service (Special Power) Ordinance 2000 and E&D Rules 1973.
 23. They shall be required to furnish copies of all their certificates/degrees along with the original receipts and photo copy thereof pertaining to the verification fee of concerned examining body (Board/University) to the Dy: District Officer (M/P) Atd. The latter shall arrange verification of all the certificate degrees of the appointee and will issue a clearance certificate to each appointee for the release of his pay. His pay bill should not be submitted to the DAO before verification of all certificate/degrees from the concerned institutions of each candidate, herein all relevant documents must be submitted to the EDO (S&L) Atd upto 21/4/2005.
 24. The ADO (M) concerned Circle should check their original certificate/degrees and Domicile.
 25. The overage candidates should not be handed over charge, the age limit is 18 to 33 years.
 26. No TA/DA etc will be allowed.
 27. Charge reports should be submitted to all concerned.
 28. Any aggrieved candidate has the right of appeal within 10 days of the issue of this notification and in case of acceptance junior most appointee appointment will be replaced/removed from service and he will have not right to appeal before any Honourable Court of Law.
 29. Appointment against disable/deceased quota subject to the provision of the concerned certificate by the competent authority/standing medical board.
 30. Who fail to joined charge upto 21/4/2005 his services/appointment will be automatically stand cancelled.

Jamir Ahmad
DISTRICT COORDINATION OFFICER
ABBOTTABAD

Endst: No: ^{8050/}7948 - /Appt/PTC(M)2005/EDO(S&L) Dated A/Abad the 9/4/2005

- Copy forwarded to the -
1. Director Schools & Literacy N.W.F.P. Peshawar.
 2. District Nazim, Abbottabad.
 3. District Coordination Officer Abbottabad.
 4. District Accounts Officer Abbottabad.
 5. District Officer (S/L) Abbottabad.
 6. Dy: District Officer (M/P) Abbottabad.
 7. A.D.O. Circle concerned.
 8. Headteacher concerned.
 9. Budget & Accounts Officer concerned.
 11. Acctt: Branch DDO(M/P) Abbottabad.
 12. Candidates concerned.
 13. Office Order file.

Jamir Ahmad
EXECUTIVE DISTRICT OFFICER
(SCH:/LIT) ABBOTTABAD

341007
SHAFIQ-UR-REHMAN

Stationery, Photostat & PCO
Link Road, Near No. 1 Govt College
ABBOTTABAD

Prop: M. Shafiq

IMPRESSIONS: *Jamir Ahmad*

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

NOTIFICATION

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification issued vide No.SO (B&A)/1-18/E&SE/2012 dated 11.7.2012 & Finance Department Endst: No.SO(FR)/FD/10-22(E)/2010 dated 16.7.2012 & No. SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre dated 13.11.2012, the following fifteen (15) Primary School Teachers are hereby promoted to the post of SPST BPS-14 (Rs.15180-1170-50280) plus usual allowances as admissible under the rules on regular basis on the terms & conditions given below and are hereby adjusted at the stations noted against their names with immediate effect:

Sr #	PST Sen:#	Name of Teacher	Present School	Place of posting	Remarks
1	70	M. Rafique PST	GPS Bandi Hamza	GPS Bandi Hamza	Promoted & posted as SPST at the same duty station
2	374	Basheer Ahmad PST	GPS Barlan NurMang	GPS Maira Kalan	(Post already occupied)
3	394	Said Akbar PST	GPS MAIRA PASALA	GPS MAIRA PASALA	Promoted & posted as SPST at the same duty station
4	981	M. Irshad PST	GPS Bomochi	GPS Bomochi	-do-
5	1180	Muhammad Shafique PST	GPS Sail	GPS Sail	-do-
6	1511	Nisar Ahmed PST	GPS Pona	GPS Pona	-do-
7	1652	Amjad Mehmood PST	GPS Chando Maira	GPS Chando Maira	-do-
8	1786	Muht Asad PST	GPS Nammal ✓	GPS Nammal ✓	-do-
9	1860	Muhammad Hanif PST	GPS Palkot	GPS Palkot	-do-
10	1903	Shabbir Hussian Shah PST	GPS Amlela	GPS Amlela	-do-
11	1941	Shazeb PST	GPS Ghori	GPS Ghori	-do-
12	2071	Afraiz Ahmed PST	GPS Ander Sari ✓	GPS Ander Sari ✓	-do-
13	2158	Muhammad Tariq PST	GPS Tatial Batangi	GPS Tatial Batangi	-do-
14	2191	Mushraf Khan PST	GPS Noshera	GPS Noshera	-do-
15	2195	Muhammad Kabeer PST	GPS Bakote ✓	GPS Bakote ✓	-do-

Terms & Conditions:

1. On their promotion, the teacher concerned will be on probation for a period of one year in terms of section-6(2) of Khyber Pakhtunkhwa Civil Servant Act 1973 read with rule 15(1) of Civil Servant (Appointment, Promotion & Transfer) Rules 1989.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded under the rules from time to time.
4. Their inter-Se-Seniority on lower post will remain intact.
5. They will give an undertaking to be recorded in their service book to the effect that if any over payment is made to them in the light of this order will be recovered and if they are wrongly promoted they will be reversed.
6. They should join their post within 15 days of the issuance of this notification. In case of failure to join their posts within 15 days of the issuance of this notification, their promotion will expire automatically and no subsequent appeals will be entertained.
7. Necessary entry should be recorded in their original service books.
8. Charge report should be submitted immediately to all concerned.
9. Checking of verification of all the documents shall be ensured by the DDO concerned.
10. No. TA/DA is allowed.

-sd-

QAZI TAJAMAL HUSSAIN
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

(Signature)

11

Endst: No. 10609-5 /Prom PST to SPST

Dated, 9/10/2017

Copy forwarded to:

1. PS to Secretary to Govt: of Khyber Pakhtunkhwa, E&SED Peshawar.
2. Director E&SED Khyber Pakhtunkhwa Peshawar.
3. District Accounts Officer Abbottabad.
4. Sub Divisional Education Officer (M) Havelian
5. Sub Divisional Education Officer (M) Abbottabad.
6. Officials concerned.
7. M/Filc.

DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

Imran Ahmad

(15)
ANNEXURE 12
OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

NOTIFICATION

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification issued vide No. SO (BAA)/1-18/2432/2012 dated 11.7.2012 & Finance Department Endst: No. SO (FRY/FD/10-22(EY)2010 dated 16.7.2012, No. SO (PE)4-5/SSRC/Meeting/2012/Teaching Cadre dated 13.11.2012 & No. & No. No. SO (PE)4-5/SSRC/ Meeting /2012/ Teaching Cadre/2017 dated 30.01.2018, the following SPSTs are hereby promoted to the post of PSHT BPS-15 (Rs.16120-1330-56020) plus usual allowances as admissible under the rules on regular basis on the terms & conditions given below and are hereby adjusted at the stations noted against their names with immediate effect.

Sr #	Sen: #	Name of Teacher	Present School	Place of posting	Remarks
1.	156	Kareem Dad	GPS Hanokel	GPS Bagla No.3	Against V/Post
2.	262	Muhammad Javed	GPS Thakri Ahmed Khan	GPS Chakar Baylan Kalan	-do-
3.	266	Sheukat Hussain	GPS Dhera	GPS Kolalan	-do-
4.	680	Muhammad Saleem	GPS Cherot	GPS Sandlali	-do-
5.	1045	Tariq Khan	GPS Anpedar	GPS Chooza Colony	-do-
6.	1254	Muhammad Mumtaz	GPS No. 05 ATD	GPS NaBeer	-do-
7.	1312	Nazar Muhammad	GPS Kasala	GPS Kasala	-do-
8.	1357	M. Ibrahim	GPS Riail	GPS Riail	-do-
9.	1427	Saghir Ahmed	GPS No.2 Mirpur	GPS Banda Nabl	-do-
10.	1519	Mir Baz Khan	GPS Naini	GPS Nalotha	-do-
11.	1599	M. Tariq Javed	GPS Chot	GPS Sanseri	-do-
12.	1608	Muhammad Hanif	GPS Barkan	GPS Jab Karl	-do-
13.	1620	Sajjad Ahmad	GPS Nayyat	GPS Rankot	-do-
14.	1663	Abdul Nasir	GPS Juhri	GPS Chakar Bian khurd	-do-
15.	1737	ZAHDOOR UL HAQ	GPS Tariqona Mistrion	GPS Tarhana Mistrion	-do-
16.	1744	Sajjad AR	GPS Bagh	GPS Ocharlan	-do-
17.	1755	Abdul Hameed	GPS Seer Gab	GPS Chafer Natha	-do-
18.	1762	M. Saeed	GPS S/Katha	GPS Kalal Kote	-do-
19.	1769	M. Naheem	GPS Dakhan Tupla	GPS Dakhan Tupla	-do-
20.	1832	Muhammad Akram	GPS Dabthar	GPS Beesala	-do-
21.	1862	Waheed Hassan	GPS Danna Bagan	GPS Danna Bagan	-do-
22.	1867	Safoor Khan	GPS Qalandarabad	GPS Rian Da Maira	-do-
23.	1881	Muhammad Ishtiaq	GPS Bankote	GPS Kutli Phulkote	-do-
24.	1899	Saeed Akhter	GPS Mala De Serl	GPS Chahran	-do-
25.	1904	Hanif Khan	GPS Upper Kani	GPS Namli Maira	-do-
26.	1907	Rab Nawaz Khan	GPS Chehr	GPS Chehr	-do-
27.	1917	Shakeel Ahmed	GPS Katha Jabli	GPS Katha Jabli	-do-
28.	1921	AMJAD HUSSAIN	GPS Qalandarabad	GPS Mast Maira	-do-
29.	1928	Zuhid Gul	GPS Mohar Khurd	GPS Narrian Sarbana	-do-
30.	1939	Muhammad Shafiqat	GPS Tootal	GPS Rich Bhan	-do-
31.	1986	Muhammad Nadeem	GPS Mohar Maghore	GPS Riail	-do-
32.	2005	Rashid Iqbal	GPS Mairan Town	GPS Maira Kalan	-do-
33.	2018	Sher Baz	GPS Maira Hassan	GPS Maira Hassan	-do-
34.	2038	Muhammad Asghar	GPS Makol Payeen	GPS Dakhan Bagan	-do-
35.	2061	Jalil-ur-Rehman	GPS Kanger Hotal	GPS Kanger Hotal	-do-
36.	2062	Muhammad Ayaz	GPS JICA Dhamroor	GPS Banda Bazdar	-do-
37.	2063	Liqat AH	GPS Beesala	GPS Khushi Kote	-do-
38.	2064	M. Jahangeer	GPS Palan	GPS Sial Khan	-do-
39.	2066	Muhammad Zariab	GPS Majhan	GPS Majhan	-do-
40.	2067	M. Fais	GPS Kairkot	GPS Kairkot	-do-
41.	2068	Iftakhar Ahmed Abbasl	GPS Tuna Khan Kalan	GPS Nakar Khan Kalan	-do-
42.	2070	Anayat-Ur-Rehman	GPS Tupla	GPS Tupla	-do-
43.	2071	Afratz Ahmed	GPS Dakha Malkot	GPS Dakha Malkot	-do-
44.	2072	Gul Zail Shah	GPS Dherlan	GPS Dherlan	-do-
45.	2073	Inam-ul-Haq	GPS Naroka	GPS Naroka	-do-
46.	2076	M. Rashid	GPS D. rra	GPS Sirla	-do-
47.	2077	Sajjad Ahmed	GPS Dakhan Nakalia	GPS Kutli Bagh	-do-

Dr. A. A. Akhtar

48.	2078	M. Khalid	GPS Kalas	GPS Kalas	-do-
49.	2079	Aurangzeb	GPS Lundi Mandri	GPS Sangrary	-do-
50.	2080	Sardar Rashid	GPS Bagh	GPS Kanthiala Bagh	-do-
51.	2082	Muhd Shoaib	GPS Lundi Mandri	GPS Ramkot	-do-
52.	2083	M. Safdar	GPS Neelo	GPS Neelo	-do-
53.	2085	Jamil Akhtar	GPS Satara	GPS Chattan Ahmed Khan	-do-
54.	2087	AMREZ KHAN	GPS M/De Barian	GPS Samar Payeari	-do-
55.	2088	M. Tanveer	GPS Summa	GPS Summa	-do-
56.	2090	M. Fiaz	GPS Chambr No. 2	GPS Ghambeer No.2	-do-
57.	2091	Tanveer Ahmed	GPS Nara	GPS Khoi Bagla	-do-
58.	2092	Chanzeb Khan	GPS Behram Gall	GPS No. 2 Havelian	-do-
59.	2094	Riaz Khan	GPS Malkan	GPS Sajawal	-do-
60.	2095	Muhammad Pervalz	GPS Karatt Bagh	GPS Khukwala Bagh	-do-
61.	2096	Saif-ur-Rahman	GPS Phallah	GPS Dannah	-do-
62.	2097	Ajmal Khan	GPS Serlan Bagh	GPS Sarian Bagh	-do-
63.	2098	Tariq Mehmood	GPS Hart Khaller	GPS Hari Khetar	-do-
64.	2099	Saghir Ahmed	GPS Topa Khan Kalan	GPS Jattal	-do-
65.	2101	Yasir Khan	GPS JICA Dhamtour	GPS Dheri Kehal	-do-
66.	2104	M. Afzaal	GPS Bashkoll	GPS Thakriala	-do-
67.	2106	Muhammad Ashraf	GPS Nav. Village	GPS Usma Dheri	-do-
68.	2110	HABIB UR REMAN	GPS Bijwan	GPS Bijwan	-do-
69.	2111	M. Adil	GPS Lora	GPS Lora	-do-
70.	2113	Jamshaid Ali	GPS Upper Chanjer	GPS Upper Chanjer	-do-
71.	2114	Atiq-ur-Rahman	GPS Bagla No 2	GPS Bagla No.2	-do-
72.	2115	KHALID MEHMOOD	GPS No.4 Ard	GPS Noormong	-do-
73.	2116	Shoukat Hayat	GPS Dakhan Tatrrela	GPS Thunda	-do-
74.	2118	Zameer Hussain	GPS Pirkote	GPS Pir Kot	-do-
75.	2122	Munzoor Ahmed	GPS Gaider	GPS Gaider	-do-
76.	2124	Muhd Sparis	GPS Jullal	GPS Sui Na Kather	-do-
77.	2125	Nadeem Shalrizad	GPS No. 01 Havelian	GPS Thoha	-do-
78.	2128	Faisal Jahangir	GPS L/ Dana Mandroch	GPS Tharyati	-do-
79.	2129	Muhammad Yousaf	GPS Karatt Bagh	GPS Karati Bagh	-do-
80.	2130	Fayaz Khan	GPS Dheri Malra	GPS Dheri (Dhamtour)	-do-
81.	2133	Fida Hussain Shah	GPS Lanjan Syedian	GPS Lanjan Syedian	-do-
82.	2134	Imran	GPS Seri Gujrat	GPS Seri Gujrat	-do-
83.	2136	Jehanzeb Khan	GPS Jaggan	GPS Jaggian	-do-
84.	2141	Affeaser Rehman	GPS Panakha	GPS Panakha	-do-
85.	2144	Muhammad Asif	GPS Halli Lakhla	GPS Seri Sher Shah	-do-
86.	2145	Waseem Ahmed	GPS Khushikote	GPS Arwar	-do-
87.	2146	MUHAMMAD IMTIAZ	GPS Bandi Dhundlan	GPS Dheri Dumkach	-do-
88.	2149	Mumtaz Alam	GPS Chanoach	GPS Chanoch	-do-
89.	2150	Muhammad Azeem	GPS Jaswal	GPS Jaswal	-do-
90.	2153	Liaqat Hussain	GPS Sarlan Bagh	GPS Khann	-do-
91.	2156	Muhammad Attiq	GPS Takhar	GPS Rlan	-do-
92.	2157	Shahjat Ali	GPS Jaudar Bari	GPS Lower Malsa	-do-
93.	2159	M. Shahid Ramzan	GPS Gal Dloke	GPS Galdhok	-do-
94.	2164	Hamid-ul-Wakeel	GPS Choona	GPS Kumar Bandi	-do-
95.	2165	Saeed Anwar	GPS Bandi Malra	GPS Bagnoter	-do-
96.	2167	Ahsanullah	CMPS B-nokote	GPS Mujhaid Abad	-do-

Terms & Conditions:

1. On their promotion, the teacher concerned will be on probation for a period of one year in terms of section-6(2) of Khyber Pakhtunkhwa Civil Servant Act 1973 read with rule 15(1) of Civil Servant (Appointment, Promotion & Transfer) Rules 1989.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded under the rules from time to time.

Imam Ahmad

14

5. They will give an undertaking to be recorded in their service book to the effect that if any over payment is made to them in the light of this order will be recovered and if they are wrongly promoted they will be reversed.
6. They should join their post within 15 days of the issuance of this notification. In case of failure to join their posts within 14 days of the issuance of this notification, their promotion will expire automatically and no subsequent appeals will be entertained.
7. Necessary entry should be recorded in their original service books.
8. Charge report should be submitted immediately to all concerned.
9. Checking of verification of all the documents shall be ensured by the DDO concerned.
10. No. TA/DA is allowed.

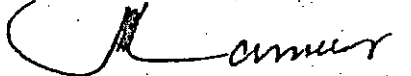
Sd/xxxxxx
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

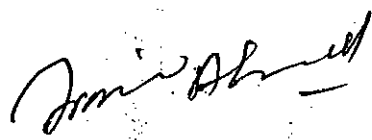
1904-14
Endst: No. _____ /Prom of SPST to PSHT

Dated 7/3 /2020

Copy forwarded to:

1. PS to Secretary to Govt: of Khyber Pakhtunkhwa, E&SED Peshawar.
2. Director E&SED Khyber Pakhtunkhwa Peshawar.
3. District Monitoring Officer (IMU) Abbottabad
4. District Accounts Officer Abbottabad.
5. Principal/Headmaster concerned.
6. Sub Divisional Education Officer (M) Abbottabad
7. Sub Divisional Education Officer (M) Havelian
8. Sub Divisional Education Officer (M) Lora.
9. Sub Divisional Education Officer (M) Lower Tanawal
10. Teachers concerned.
11. M/File.


DY: DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD





Detailed Marks Certificate

DMC No. SU/ 043965

Place of Study:
Abbott Group of Colleges, Islamabad.

Annexure (D)

Spring 2022



Student's Name Afraiz Ahmad

Roll No. 20-FA-04510

Father's Name Karam Elahi

Registration No. SUIT-20-01-059-0184

Programme Master in Health & Physical Education - 2 Years

Term No. 4

Courses	Max Marks	Marks Obtained		Remarks
		In Fig.	In Words	
Philosophical Basis of Physical Education	100	075	Seventy Five	Pass
Rules & Techniques of Games & Sports	100	079	Seventy Nine	Pass
Advance Health Education	100	070	Seventy Only	Pass
Science of Track & Field	100	063	Sixty Three	Pass
Tech. & Teach. of Track & Field (Practical)	50	034	Thirty Four	Pass
Bio Mechanics	100	065	Sixty Five	Pass
Tech. & Teach. of Gymnastic (Practical)	50	040	Fourty Only	Pass
Sports Medicine	100	072	Seventy Two	Pass
Physical Education for Social Needs	100	069	Sixty Nine	Pass
Nutrition in Sports	100	072	Seventy Two	Pass
Teaching Practice + Project	100	093	Ninety Three	Pass
Tech. & Teach. of Games (Practical)	50	040	Fourty Only	Pass
Test Measurement & Evaluation in Physical Edu	100	057	Fifty Seven	Pass
Research Method in Physical Education	100	060	Sixty Only	Pass
Psychology of Sports	100	063	Sixty Three	Pass
Exercise Physiology	100	066	Sixty Six	Pass
Administration & Management in Physical Edu	100	059	Fifty Nine	Pass
Science of Sports Training	100	057	Fifty Seven	Pass
Planning Facilities in Physical Edu. & Rec.	100	058	Fifty Eight	Pass
Curriculum Development in Physical Education	100	066	Sixty Six	Pass
Total	1850	1258	One Thousand Two Hundred Fifty-Eight	Pass

General Remarks The Examination was passed as a Whole in 1st division

Exam held 10-Oct to 09-Nov-2022

Result declared February 15, 2023

Date of issue May 08, 2023

(Errors and omissions are subject to subsequent rectification)

(Degree Completed)

Controller of Examinations

[Signature]

No. 2419 /EB-III/PromotionDate: 12/04 /2023

To

Annexure E,

(16)

All Sub Divisional Education Officer Male
AbbottabadSubject: SUBMISSION OF ACRs/DOCUMENTS FOR PROMOTION

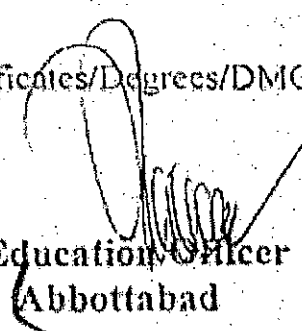
Memo:

It is to inform you that meeting of Departmental Promotion Committee is scheduled to be held on 02-05-2023 at Sub Divisional Education Office Male Abbottabad. You are therefore directed to submit the following attested documents for promotion of SPST, PSHT to CT, PET, DM (as per share mentioned below) of your respective schools on or before 28-04-2023 positively.

S.No	CT 60%	DM 20%	PET 20%
1	41	04	02

Detail of required documents.

1. CNIC
2. Bio data form duly signed by the Head of Institutions
3. ACRs last five years
4. Synopsis
5. Result last five years
6. Non Involvement Certificate
7. Last Pay Slip
8. 1st Appointment order
9. Last Promotion Order
10. Attested Copies of all Academic/Professional Certificates/Degrees/DMCs
11. Original Service Book



District Education Officer Male
Abbottabad

Endst of Even Number and Date

Copy Forwarded to The: -

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. PS to Secretary Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar

SD

District Education Officer Male
Abbottabad



Annexure F,

17

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD.

OFFICE ORDER

Consequent upon the recommendation of Departmental Promotion Committee and in pursuance of the Govt of Khyber Pakhtunkhwa E&SE Department Notification Issued vide Endst. No. SO (B&A)/1-18/E&SE/2012 Dated 11-07-2012 and finance Dept Endst No. SO (FR/FO/10-22/2010) dated 16-7-2012, No. SO PE 4-5/SSRC/Meeting/2012/Teaching Cadre dated 13-11-2012 and No. SO PE 4-5/SSRC/Meeting/2012/Teaching Cadre/2017 dated 30-01-2018 the following PSHTs are hereby promoted to the post of CT/PET&DM BPS-15 (Rs.23920-1980-83320) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government on the terms & conditions given below and hereby further posted against vacant post of CT/PET & DM in the schools noted against their names with immediate effect.

(MALE) ABBOTTABAD.

S. No	SEN No	Name of Teacher	Name of School	Date of Birth	D/O Regular Apptt: AS PST	Place of Posting	Remarks
1	426	Niaz	GPS Chitra Malra	01/Feb/73	16/Mar/97	GMS Hazara	Against vacant post
2	472	Muhammud Khalid	GPS Kalas	01/Jun/71	16/Apr/05	GHSS Seer	Against vacant post
3	495	Shafiq Ali	GPS Lower Malra	29/Mar/76	09/Jun/06	GHS Malra	Against vacant post
4	504	Saeed Nawaz	GPS Bagholar	12/Mar/71	14/Mar/09	GHS Sumanadip Kaha	Against vacant post
5	534	Saghir Ahmed	GPS Jandala	02/Mar/94	26/Dec/08	GHS Khajra Gali	Against vacant post
6	535	Saif-Ur-Rehman	GPS Nisby Sydala	04/Nov/80	21/Dec/10	GMS Gul Bandi	Against vacant post
7	540	Muhammad Tanveer	GPS Skila	15/May/80	21/Dec/10	GHSS Balola	Against vacant post
8	542	Malik Kashif Awan	GPS Gulbandi	13/Nov/79	21/Dec/10	GHS Sherwan	Against vacant post
9	544	M. Munir	GPS Pata Bandi	01/Feb/79	21/Dec/10	GMS Sangreri	Against vacant post
10	545	M. Sabir	GPS Pata Doga	04/Mar/76	21/Dec/10	GHS Hadora Bandi	Against vacant post
11	548	Muhammad Shoib	GPS Zaro Gali	25/May/77	21/Dec/10	GMS Tandara	Against vacant post
12	553	Muhammad Kabir Abbas	GPS Khushi Kora	23/Oct/82	21/Dec/10	GHS Bakot	Against vacant post
13	557	Muhammad Imran	GPS Bagle No-4	30/Jun/85	21/Dec/10	GMS Allahad	Against vacant post
14	558	Fazal Karim	GPS Makar Qutbal	01/Mar/75	21/Dec/10	GHS Lahoar	Against vacant post
15	559	Shakeel Ahmad Khan	GPS Gullala	10/Feb/87	21/Dec/10	GMS Tado Malra	Against vacant post
16	560	Naseer Ahmed	GPS Champali	28-05-1972	21/Dec/10	GMS Salkot	Against vacant post
17	561	Gul Noshad	Sherwan	15/Apr/81	21/Dec/10	GMS Tandara	Against vacant post
18	563	Naseer Ahmed	GPS Rakkar Besala	01/Sep/74	21/Dec/10	GMS Shaeedabad	Against vacant post
19	564	Saeed Mahmood	GPS Panakha	06/Mar/80	21/Dec/10	GHSS Badla	Against vacant post
20	569	M. Sadique	GPS Gandola	10/Jun/80	21/Dec/10	GHS Kanthal	Against vacant post
21	577	Zaid Ali Hussain	GPS Tahsar	15/Jun/77	21/Dec/10	GHS Beerangali	Against vacant post
22	579	M. Farooq	GPS Bol	08/Aug/77	21/Dec/10	GHS Bol	Against vacant post
23	580	Wahed-Ur-Rehman	GPS Chalthoca	01/Jun/76	21/Dec/10	GMS Seri Khan Kalan	Against vacant post
24	581	Muhammad Saif	GPS Niyala Bandi	27/Sep/72	21/Dec/10	GMS Salkot	Against vacant post

(Signature)

	582	Raja Muhammad Yaqub	GPS Pehlwan	03/Mar/80	21/Dec/10	GHS Khanispur Ayubia	Against vacant post
26	583	Habib Ur Rehman	GPS Noormong	25/Mar/77	21/Dec/10	GHS Kasala	Against vacant post
27	584	Saif Ur Rehman	GPS Makra	01/Mar/77	21/Dec/10	GHS Bolu	Against vacant post
28	585	Muhammad Saleem	GPS Bandial	09/Apr/80	21/Dec/10	GMS Ander Serj	Against vacant post
29	586	Muhammad Mushlaq	GPS Riyala Stalkot	17/May/76	21/Dec/10	GMS Khukhala	Against vacant post
30	587	Asad Khan	GPS Thanda Chowa	06/Jun/77	21/Dec/10	GHS Toheedabad	Against vacant post
31	589	Tahir Khan	GPS Choona Karl	01/Feb/80	21/Dec/10	GMS Stalkot	Against vacant post
32	590	Wajid Khan	GPS Thora Kalan	01/Apr/79	21/Dec/10	GMS Bandi Matrach	Against vacant post
33	592	M. Abid	GPS Chakarbiyan Shurd	01/Jun/79	21/Dec/10	GMS Kanpur Payeen	Against vacant post
34	596	Muhammad Adil Khan	GPS Tankol	10/Mar/81	21/Dec/10	GHSS Dalola	Against vacant post
35	597	Abdul Qadeer	GPS Bandi Matrach	13/Feb/83	21/Dec/10	GMS Thathi Faqeer Sahib	Against vacant post
36	599	Zafar Iqbal	GPS No-4 Aid	05/Mar/79	21/Dec/10	GHS No-4 Aidul	Against vacant post
37	600	Muhamad Fayaz	GPS Mohar Kalan	15/Apr/76	21/Dec/10	GHSS Khanispur Ayubia	Against vacant post
38	601	Faisal Sarfraz	GPS Mukdadi	10/Apr/85	21/Dec/10	GHSS Khanispur Ayubia	Against vacant post
39	602	Shabir Ahmed	GPS Bagla No 01	15/Mar/76	21/Dec/10	GMS Dabban	Against vacant post
40	604	Muhammad Furwan	GPS Pando Thana	15/Feb/78	21/Dec/10	GHS Paya	Against vacant post
41	608	M. Nisar	GPS Karoz	20/Mar/77	21/Dec/10	GMS Gooereni	Against vacant post
PSHT TO PET							Against vacant post
1	619	Sohail Mehbob	GPS Baeha Sahi	02/Feb/90	21/Dec/10	GMS Thathi Ahmed Khan	Against vacant post
2	625	Imtiaz Ur Rehman	GPS Harwana	14-Jul-79	21/Dec/10	GMS Malkot	Against vacant post
PSHT TO DM							Against vacant post
1	667	Gul Zaib Shah	GPS Dherian	15/Apr/79	15/Apr/05	GMS Bassan	Against vacant post
2	668	Majid Khan	GPS Saar	01/Apr/79	21/Dec/10	GMS Malkot	Against vacant post
3	656	Muhammad Sajid	GPS Hazera	14/Apr/81	21/Dec/10	GMS Dabban	Against vacant post
4	678	Muhammad Ibrahim	GPS Pirkot	01/Aug/85	21/Dec/10	GMS Pirkot	Against vacant post

Note: All the above mentioned teachers will continue their current duties at their already allotted blocks/areas.

Terms & Conditions:

1. On their promotion the teachers concerned will be on probation for a period of one year in terms of section-6 (2) of Khyber Pakhtunkhwa Civil Servant Act 1973 read with the rule 15 (1) of Civil Servant (Appointment, Promotion and Transfer) Rules 1989.
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. Their services can be downgraded at any time in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded under the rules framed from time to time.
4. Charge report shall be submitted to all concerned.
5. Their inter-se seniority on lower post will remain intact.
6. No TA/OA is allowed for joining their duty.
7. They will give an undertaking to be recorded in their service books to the effect that if any over payment is made to them in the light of this order, will be recovered and if they are wrongly promoted, their order will be reversed.

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18

- ... join their post their posts within 15 days of the issuance of this notification, in case of failure to join their posts within 15 days of the issuance of Notification, their promotion will expire automatically and no subsequent appeals will be entertained.
- 9. Necessary entry should be submitted immediately to all concerned.
- 10. Charge Report should be submitted immediately to all concerned.
- 11. Checking of verification of all the documents shall be ensured by the DDO concerned.

MUHAMMAD TANVEER
 DISTRICT EDUCATION OFFICER (M)
 ABBOTTABAD

Endst: No. 3165-74 / EB-III/promotion PSHT to CT

Dated A.Abad the 11 / 5 / 2023

Copy forwarded to the:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar. In case of failure to join their posts within 15 days of the issuance of Notification, their promotion will expire automatically and no subsequent appeals will be entertained.
2. All the Principals/Headmasters of concerned Schools.
3. District Comptroller of Accounts Abbottabad.
4. District Monitoring Officer (DMO) Abbottabad.
5. Sub Divisional Education Officer (M) Abbottabad, Havelian, Lower Tanawal and Lora.
6. PS to Secretary to Govt. of Khyber Pakhtunkhwa, E&SED Peshawar.
7. Budget & Accounts Officer local office.
8. Assistant Director EMIS branch local office.
9. All the Teachers concerned.

MUHAMMAD TANVEER
 DISTRICT EDUCATION OFFICER (M)
 ABBOTTABAD

11 / 5 / 2023

DISTRICT EDUCATION OFFICER (M)
 ABBOTTABAD

Handwritten signature

To

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

Annexure 19

Subject

DEPARTMENTAL APPEAL AGAINST THE OFFICE ORDER DATED 11/05/2023 ISSUED UNDER ENDORSEMENT NO 3165-74 BY THE DEO (M) ABBOTTABAD, TO THE EXTENT OF PSHT TO PET AT SERIAL NO 1 & 2 WITH THE NAME OF HIS JUNIORS SOHAIL MEHMOOD SENIORITY NO 619 & IMTIAZ UR REHMAN SENIORITY NO 625.

AFTER CANCELLATION OF ABOVE OFFICE ORDER TO THE EXTENT OF PSHT TO PET AT SERIAL NO 1 & 2, PROMOTE TO APPELLANT AS PET ON SENIORITY BASIS AND GRANT OF CONSEQUENTIAL BENEFITS/PROMOTION ETC.

Respected sir

With due respect, appellant's departmental appeal is as under.

- 1) That appellant joined Elementary & Secondary Education Department on 16/04/2005 as a PST and presently he is serving in the capacity of PSHT in the present station, he has passed his MSc HPE on 07/03/2023. Copy of MSc HPE are also attached.
- 2) That now appellant has come to know that Promotion Order Dated 11/05/2023, PSHT TO PET on the basis of seniority cum fitness and his seniority no 507, while appellant's two juniors Sohail Mehmood, seniority no 619 & Imtiaz Ur Rehman seniority no 625 promoted. Copy of Promotion office order Dated 11/03/2023 is attached
- 3) That despite of facts appellant's name is shown at serial No 507, while he also passed his MSc HPE, but ignored in the promotion after filing personal files.

It is, therefore, respectfully requested that on acceptance of instant Departmental appeal, appellant may please be promoted as PET by cancelling Promotion Order Dated 11/05/2023, to the extent of appellant's two juniors Sohail Mehmood, seniority no 619 & Imtiaz Ur Rehman seniority no 625 and appellant may please be granted its consequential promotion/benefits.

Dated 24/05/2023

Afraiz Ahmed S/O Karam Elahi PSHT
GPS Dhaka Malkot, Circle Berote)
Abbottabad.

10.4

RGL105525208

See reverse.

Rs.

Ps.

Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or of which no acknowledgement is due.

Received a registered letter addressed to

The Director

Date Stamp

Initials of Receiving Officer

*Write here "letter", "post card", "packet" or "parcel" with the word "insured" before when necessary.

Insured for Rs. (in figures)

Insurance fee Rs.

(in words)

Name and address of sender

Weight of parcel

Weight in Kilo

Grams

Registered Parcel

S.No. 203317



Name of Advocate _____

DBA NO. _____

TBA NO. _____

BC No. _____

R.s.200/-

وکالت نامہ
Annexure H

Ch Muhammad Naeem
Finance Secretary
District Bar Association
Abbottabad

بعدالت
عنوان: Ajoaz Ahmed
مخائب: Appellant
نوعیت مقدمہ: سروں اول

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پوری وجوہی پر پیشی با تفسیر مقدمہ بمقام ایسٹ ایبٹ آباد سٹریٹ جج اور اپنی طرف سے واسطے پوری وجوہی پر پیشی با تفسیر مقدمہ بمقام ایسٹ ایبٹ آباد سٹریٹ جج کے لیے
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2023/09/02 مورخہ:

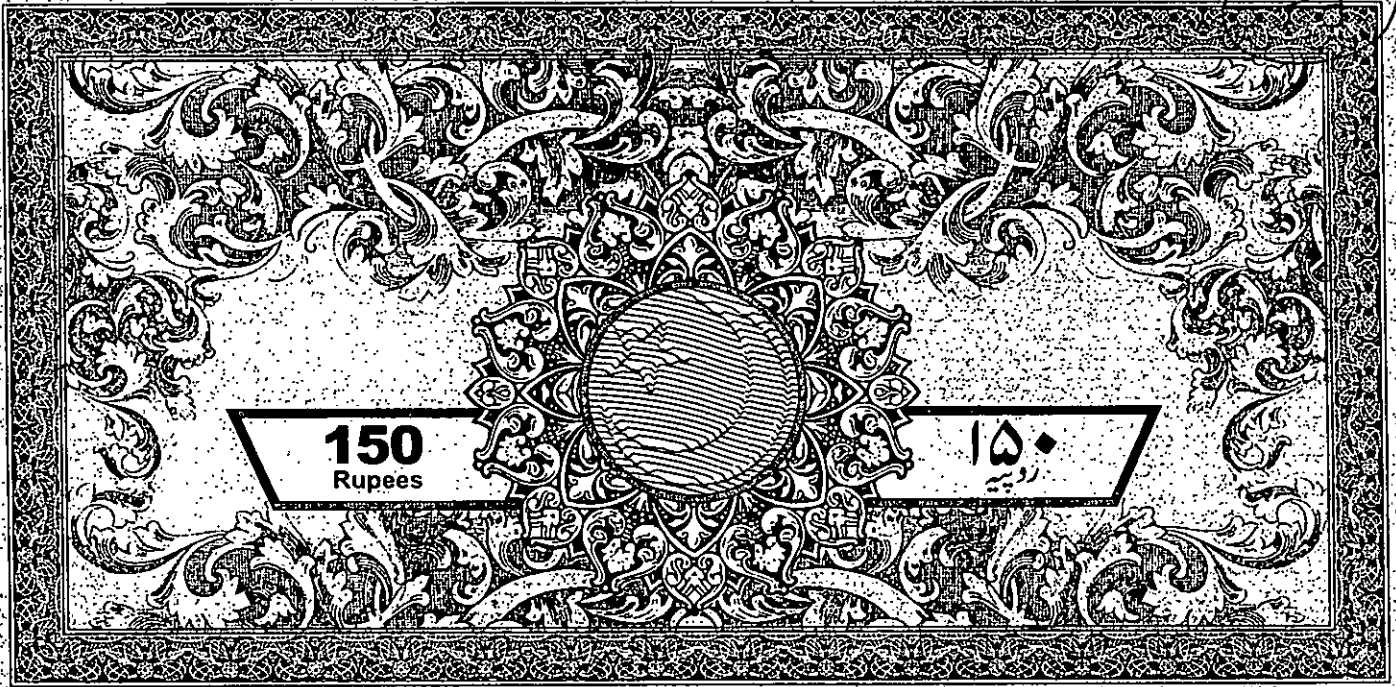
مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔ دن ماہ سال

نوٹ: وکالت نامہ کی فوٹو کاپی قابل قبول نہ ہوگی

Accept
Hamid

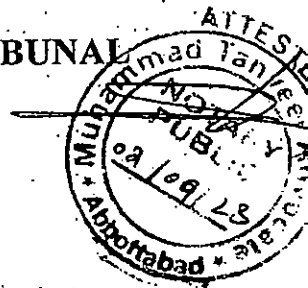
Signature

Ajoaz Ahmed



**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.**

Service Appeal No: _____ of 2023



Afraiz Ahmed S/O Karam Elahi PSHT, GPS Dhaka Malkot, Circle
(Berote) Abbottabad.

Appellant

Versus

The Director, Directorate of Elementary & Secondary Education
Department, Peshawar and others.

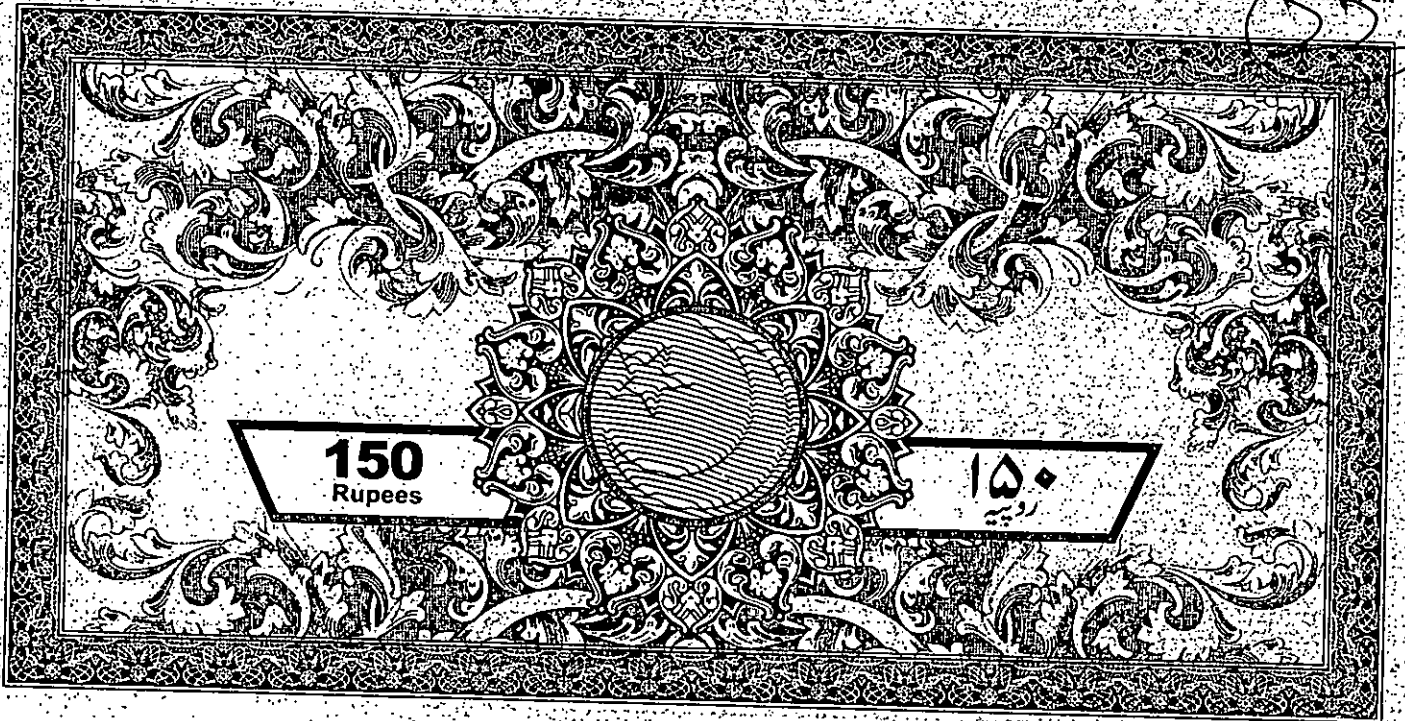
Respondents

SERVICE APPEAL

POWER OF ATTORNEY

NAME & OTHER PARTICULARS OF ATTORNEY

Mr Rashid Iqbal Khan Jadoon Advocate Islamabad Bar Islamabad,
Abbott Law Chamber Office No 6 Ground Floor, Ayub Tanoli lawyer
plaza Abbottabad. 0333-5025002, 0316-9343818, CNIC No 13101-
0944593-9.



I, Afraiz Ahmed S/O Karam Elahi PSHT, GPS Dhaka Malkot, Circle
 (Berote) Abbottabad, deponent, do hereby solemnly affirm and declare
 on oath that I appoint **above named** as attorney to act on my behalf to
 appear, plead for me in the titled case in which the same may be tried or
 heard and any other proceedings arising out of or connected herewith and
 he would be competent to exercise all the powers which I myself holds as
 appellant, he is authorized all powers, to institute case, to submit any kind
 of application or reply, argue the case, in short, all powers or authority
 which I am entitled being petitioner, would be transferred to above named
 attorney through instant power of attorney.

Sworn at Abbottabad Dated this 02th day of September, 2023.

Dated 02/09/2023

Afraiz Ahmed
 (Afraiz Ahmed)
 Appellant

CNIC No 13101-0863861-9

DEPONENT

