


FORM OF ORDER SHEET

Court of _____

Appeal No. 1860/2023


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/09/2023	<p>The appeal of Mr. Muhammad Asad Khan resubmitted today by Akhunzada Ahmad Saeed Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

The appeal of Mr. Muhammad Asad Khan Computer Operator DEO Office Battagram received today i.e on 12.09.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Page no. 8, 9, 10 & 12 of the appeal are illegible which may be replaced by legible/better one.

No. 1415 /S.T,

Dt. 13/9 /2023.



13/9/23

REGISTRAR

SERVICE TRIBUNAL

KHYBER PAKHTUNKHWA

PESHAWAR.

AKhunzada Ahmad Saeed Adv.
High Court Peshawar.

Note

14/9/2023

Resubmitted

full

after doing need



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 1860 /2023

Muhammad Asad KhanVs.....the Secretary E&SE etc

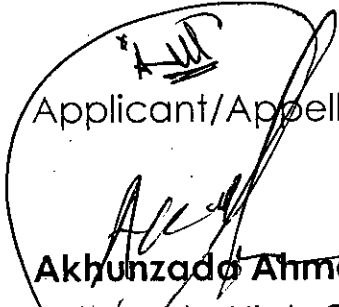
**APPLICATION FOR FIXING THE INSTANT
SERVICE APPEAL AT PRINCIPAL SEAT AT
PESHAWAR FOR PRELIMINARY HEARING.**

Respectfully Sheweth:

1. That the applicant/appellant has filed the instant service appeal in which no date is fixed so far.
2. That the counsel for the applicant/appellant is doing legal practice at Peshawar as well as the addresses of the main respondents i.e. Secretary (E&SE) and Director (E&SE) are also at Peshawar and the appellant also wants to pursue his case at the principal seat at Peshawar.
3. That it will be convenient for the counsel as well as for the applicant/appellant to fix the instant service appeal at principal seat at Peshawar.

It is therefore most humbly prayed that on the acceptance of this application, the instant service appeal may kindly be fixed at principal seat at Peshawar

Through


Applicant/Appellant

Akhunzada Ahmad Saeed
Advocate High Court

Dated 12.09.2023

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

Service Appeal No. 1860 /20

Muhammad Asad Khan..... ppellant

V E R S U S

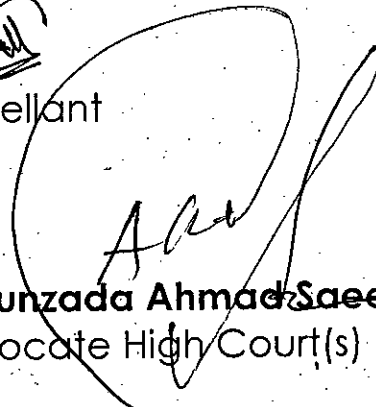
The Secretary E&SE Peshawar & others Respondents

I N D E X

S#	Description of Documents	Ann.	Pages
1.	Service Appeal with affidavit		1-6
2.	Addresses of parties		7
3.	Copy of office order dated 21.04.2022	A	8
4.	Copy of Office Order dated 10.01.2023,	B	9
5.	Copy of Office Order dated 27.12.2022,		10
6.	Copy of Departmental Appeal dated 11.01.2023	C	11
7.	Copy of Office order dated 20.01.2022	E	12
8.	Copies of the extracts from attendance register	F	13-20
9.	Copy of the Departmental Appeal	G	21
10.	Wakalatnama		22

Through

Appellant


Akhuzada Ahmad Saeed
Advocate High Court(s)

Dated 12.09.2023

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 1860/2023

Muhammad Asad Khan, Computer Operator. (BPS-16),
DEO (F) Office Battagram.....**Appellant**

V E R S U S

1. The Secretary
Elementary & Secondary Education,
Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar
2. The Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar
3. The District Education Officer (F)
District Battagram**Respondents**

**SERVICE APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL ACT,
1974, AGAINST THE IMPUGNED ACTION OF
THE RESPONDENTS BY NOT RELEASING THE
SALARIES OF THE APPELLANT FROM THE
MONTH OF JANUARY 2023 TILL DATE AND
AGAINST THE IMPUGNED ACTION, BY NOT
TAKING ACTION ON THE DEPARTMENTAL
APPEAL OF THE APPELLANT WITHIN THE
STIPULATED PERIOD OF NINETY DAYS.**

2

Prayer

By accepting this appeal, the respondents may please be directed to release the appellant's salaries from the month of January 2023, till date and onward

Any other remedy, which this Hon'ble Tribunal deems fit and appropriate may also be granted in favour of the appellant

Respectfully Sheweth:

1. That the appellant has been serving the respondent department as Computer Operator (BPS-16) with fully devotion, commitment and dedication since 01.10.2007.
2. That the appellant was transferred from the office of the DEO (M) Battagram to the office of the DEO (M) Battagram on 21.04.2022. **(Copy of office order dated 21.04.2022 is attached as Annexure "A").**
3. That vide office order dated 10.01.2023, the appellant was prematurely transferred from the office of DEO (F) Battagram to DEO (M)

3

Battagram and that too during ban period as the appellant impugned the office order dated 10.01.2023 through departmental appeal which was allowed and the impugned order dated 10.01.2023 was withdrawn through office order dated 20.01.2022. **(Copies of Office Order dated 10.01.2023, Office Order dated 27.12.2022, Departmental Appeal dated 11.01.2023 and Office order dated 20.01.2022 are attached as Annexures "B, C, D & E respectively)".**

4. That the appellant is regular and punctual but despite of that the respondents are not releasing the salaries of the appellant since the month of January 2023, till date. **(Copies of the extracts from attendance register are attached as annexure "F").**

5. That the appellant then filed departmental appeal for the released of his grievance but the same was not decided within a stipulated period of ninety days. **(Copy of the Departmental Appeal is attached as Annexure "G").**

4

6. That the appellant being mortally aggrieved, prefers this service appeal for the following amongst others grounds:

GROUND S:

- A. That as stated in the body of the appeal that the appellant is performing his duty regularly but the impugned action of the respondents by not releasing the salaries of the appellant as illegal, unlawful, against the law, rules, facts, norms of justice and thus ineffective upon the rights of the appellant.
- B. That it is the legal and constitutional rights of the appellant to that his salaries be released on account of performance of his duties but the appellant has been deprived from same which clearly amounts to slavery.
- C. That the appellant has not been treated in accordance with law and he has also been deprived of equal protection of law.
- D. That the respondents are legally bound to release the salaries of the appellant but they have acted otherwise which constrained the

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appellant to approach this Hon'ble Service Tribunal.

E. That any other ground, not specifically mentioned, may be raised at the time of arguments, with the prior permission of this Hon'ble Tribunal.

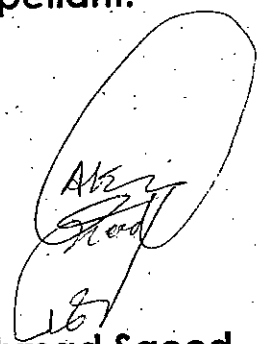
It is, therefore, most humbly prayed that by accepting this Service Appeal, the respondents may please be directed to release the appellant's salaries from the month of January 2023, till date and onward

Any other relief deems fit and appropriate in the circumstances of the instant appeal may also be passed in favour of the appellant.



Appellant

Through



Akhuzada Ahmad Saeed
Advocate High Court

Dated 12.09.2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/202.

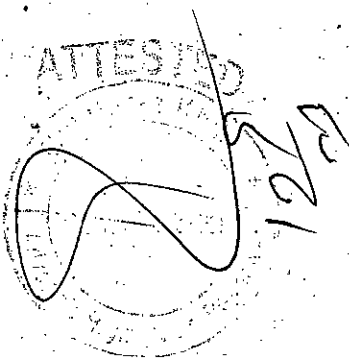
Muhammad Asad Khan...../ Petitioner

VERSUS

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

AFFIDAVIT

I, Muhammad Asad Khan, Computer Operator (BPS-16), DEO (F) Office Battagram, do hereby solemnly affirm and declare that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



DEPONENT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____/2023

Muhammad Asad Khan.....Appellant

V E R S U S

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

ADDRESSES OF PARTIES

A P P E L L A N T:

Muhammad Asad Khan, Computer Operator (BPS-16),
DEO (F) Office Battagram

R E S P O N D E N T S

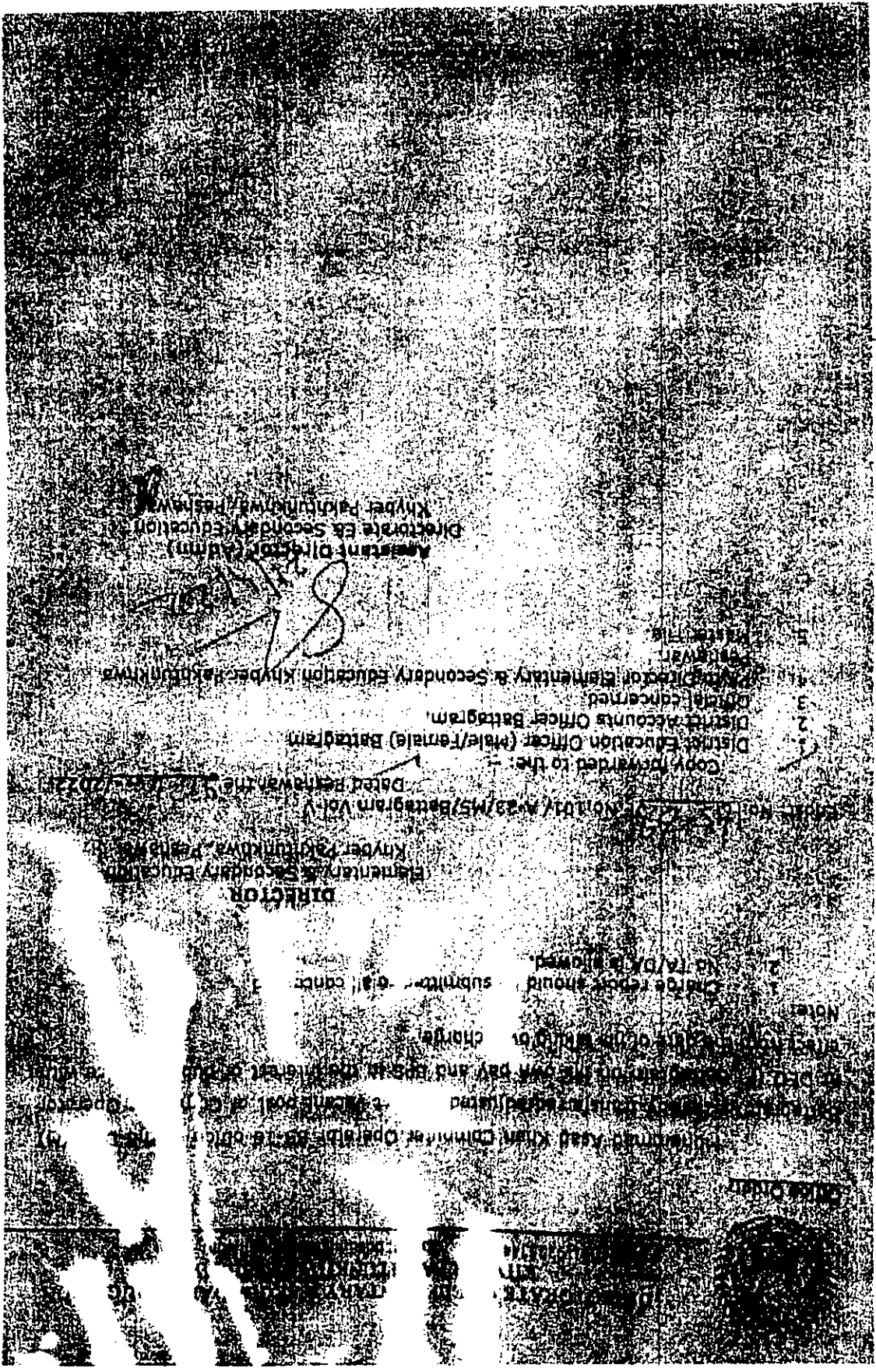
1. The Secretary
Elementary & Secondary Education,
Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar
2. The Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar
3. The District Education Officer (F)
District Battagram


Appellant

Through


Akhuzada Ahmad Saeed
Advocate High Court(s)

Dated 12.09.2023



Assistant Director (General)
Directorate of Secondary Education
Khyber Pakhtunkhwa, Peshawar

Copy forwarded to the:-
1. District Education Officer (Male/Female) Bataigram
2. District Accounts Officer Bataigram
3. Official concerned
4. Director of Elementary & Secondary Education Khyber Pakhtunkhwa
5. General
6. Master File

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Note:
1. Charge report should be submitted in all copies.
2. No I.A./D.A. allowed.
3. The Director should read the report and sign on the own part and forward to the Director of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
4. The Director should also forward a copy to the District Education Officer (Male/Female) Bataigram.

تاریخ: 10/10/2021

Better Copy

Annexure-A

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

Phone: 091-9225144

Office Order

Muhammad Asad Khan Computer Operator BS-16 of the DEO (M) Battagram is hereby transferred/adjusted again vacant post of Computer Operator of DEO (F) Battagram on his own pay and BPS in the interest of public service with effect from the date of his taking over charge.

Note:

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

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst No. 165-68 No. 10 1/A-23/MS/Battagram Vol-V

Dated Peshawar the 21.04.2022

Copy forwarded to the

1. Director Education Officer (Male/Female) Battagram.
2. District Education Officer Battagram.
3. Official concerned.
4. PA o Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
5. Master File.

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

9

Annex B^u 5



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.
Phone: 091-9223344 Email: ddadmnese@gmail.com

OFFICE ORDER.

The posting/transfer in respect of the following officials is hereby ordered on their own pay and BPS in the interest of public service with effect from the date of their taking over charge.

S.#	Name/Design:	Present Posting	Adjusted at	Remarks
1	Mr. Asad Khan Computer Operator BPS-16	DEO (F) Battagram	DEO (M) Battagram	A.V.P
2	Mr. Murshid Alam Computer Operator BPS-16 (working against wrong post of Assistant Programmer)	DEO (F) Battagram	DEO (F) Battagram	V.S.No. 01

Note:-

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

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No: 6352-56 / F.No/A-23/MS/Transfer/Adjustment/KPK/2020
Dated Peshawar the 10/1/2023.

Copy forwarded to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar/District Accounts Officer Concerned.
2. District Education Officer (M/F) Battagram.
3. Officials concerned.
4. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
5. Master File.

[Signature]
10/1/23
Assistant Director (Admn)
Directorate EA Secondary Education
Khyber Pakhtunkhwa, Peshawar

D:\Admn\Inhd AI\Class IV\Transfer\Fatal Shukrod Hussain and Murshid Alam Battagram.doc

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Annexure-B

**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR**

Phone No. 091-9225344

Email: ddadmn.ese@gmail.com

OFFICE ORDER

The posting/transfer in respect of the following officials is hereby ordered on their own pay and BPS in the interest of public service with effect from the date of their taking over charge.

S. No	Name/Design	Present posting	Adjusted to	Remarks
1	Mr Asad Khan Computer Operator BPS-16	DEO (F) Battagram	DEO (M) Battagram	A.V.P
2	Mr. Murshid Alam Computer Operator BPS-16 (working against wrong post of Assistant Programmer	DEO (F) Battagram	DEO (M) Battagram	V.S No. 1

Note:

3. Charge Report should be submitted to all concerned.
4. No TA/DA is allowed.

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst No. 6352-56 /F.No/A-23/MS/Transfer/Adjustment/KPK/2020

Dated Peshawar the 10.01.2023

Copy forwarded to the

1. Director Education Officer (Male/Female) Battagram.
2. District Education Officer Battagram.
3. Official concerned.
4. PA o Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
5. Master File.

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

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Annex 'C'

6

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block 'A' Opposite MPA's Hostel Civil Secretariat Peshawar

Peshawar, Dated 27th December, 2022

OFFICE ORDER

No. SO(SMIE&SED)/5-17/2022/PT/G: The competent authority is pleased to impose complete ban on all kinds of postings & transfers in Elementary & Secondary Education Department till further orders with immediate effect.

2 However, posting/transfers on administrative grounds, new recruitments, court cases, repatriation of deputationists, promotion cases, Officers/officials waiting for posting security issues, medical cases and summaries/notes already processed for approval of the Competent Authority will be exempted from the ban.

3 This Notification is issued in the best public interest.

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
& SE DEPARTMENT**

Ends of given No. & Date

Copy forwarded to the

1. PSO to Chief Secretary Khyber Pakhtunkhwa.
2. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa, Abbottabad.
4. The Director, Directorate of Professional Development Peshawar.
5. Director, E&SE Department for uploading of official website.
6. PS to Principal Secretary to Chief Minister Khyber Pakhtunkhwa.
7. All District Education Officers (Male/Female), Khyber Pakhtunkhwa.
8. All Section Officers, E&SE Department Khyber Pakhtunkhwa.
9. PS to Minister for E&SE Department.
10. PS to Secretary, E&SE Department.
11. PS to Special Secretary, E&SE Department.
12. PA to Additional Secretary (Estab) E&SE Department.
13. Office order file.

Inaseer
27-12-22

**(INASEER ABBAS KHALIL)
SECTION OFFICER (SCHOOLS MALE)**

CamScanner

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-A Opposite MPA Hospital Civil Secretariat Peshawar

Peshawar Dated the 27th December 2022

OFFICE ORDER

No. SO (SM) E&SED/5-17/2022/PT/G The competent authority is pleased to improve complete on all kinds of posting Elementary and Secondary Education Department till further order with immediate effect.

2. However, posting/transfer on administrative grounds new recruitments cases of department promotion cases Officers/officials waiting for posting security medical cases processed for approval of competent authority will be exempted from the ban.

3. The notification is issued to the best public interest.

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA

E&SE DEPARTMENT

Endst of even No and date

Copy forwarded to the

1. PSO to Chief Secretary Khyber Pakhtunkhwa.
2. The Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
3. The Director cumculum and teacher Education Khyber Pakhtunkhwa Abbottabad.
4. The Director Directorate of Professional Development Peshawar.
5. Director EMIS E&SE Department for uploading at official website.
6. PS to Principal Secretary to Chief Secretary Khyber Pakhtunkhwa.
7. All District Education Officers (Male/Female) Khyber Pakhtunkhwa.
8. All Section Officer E&SE Department Khyber Pakhtunkhwa.
9. PS to Minister for E&SE Department.
10. PS to Secretary for E&SE Department.
11. PS to Special Secretary E&SE Department.
12. PA to Additional Secretary (Estab) E&SE Department.
13. Office order file.

(NASEER ABEAS KHALIL)
SECTION OFFICER (SCHOOL MALE)

(11)

Approved

Dated; 11-01-2023

To

The Honorable Secretary,
Elementary & Secondary Education,
Khyber Pakhtunkhawa Peshawar

Subject: APPEAL

Respected Sir,

With due respect, it is stated that I am working as **Computer Operator BPS-16** in **District Education Officer (F) Battagram** since **21-03-2022** (Copy attached). The Director, Elementary & Secondary Education Peshawar did my transfer order to **District Education Office (M) Battagram** on **10-01-2023** and the person occupying wrong post in the DEO (F) office Battagram is adjusted on my place. Sir ^{instead} of transferring the wrong employee on original vacant post I am displaced.

Sir, a ban on Posting/transfer in Elementary & Secondary Education Department has been imposed by your good self on **27-12-2022** (Copy attached).

It is worth mentioning that I performed my duties in the District Education Office (F) Battagram only for eight months and my tenure is not even completed.

Your good self is requested kindly cancel my transfer order and give me justice. I will be very thankful to you for this act of kindness and make oblige.

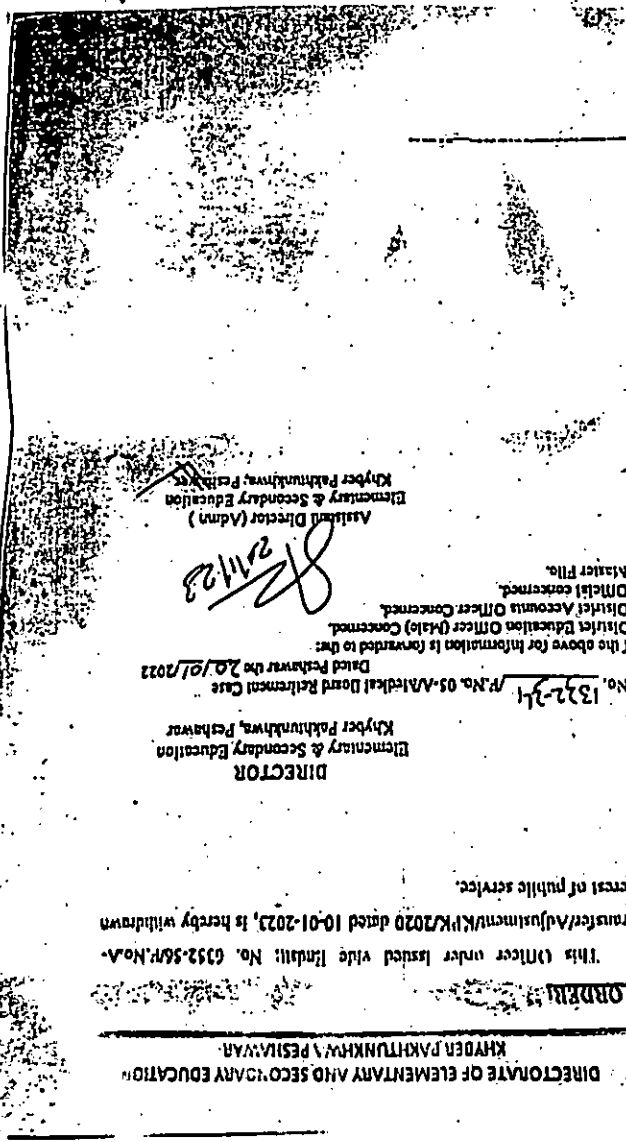


Muhammad Asad Khan

Computer Operator BPS-16

Copy for information to the

1. Directorate Elementary & Secondary Education Khyber Pakhtunkhawa Peshawar.



DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR



OFFICE ORDER

This office order issued vide Indul: No. 032-56P/NoA-23/19/Transfer/Adjustment/KP/2020 dated 10-01-2023, is hereby withdrawn in the interest of public service.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Indul: No. 132-24/P.No. 05-A/medical Board Retirement Case Dated Peshawar the 20/01/2023

Copy of the above for information is forwarded to the:
1. District Education Officer (Male) Concerned.
2. District Accounts Officer Concerned.
3. Officer concerned.
4. Master File.

8/2/11/23

Assistant Director (Admin)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Ac. B. ex B.

(12)

**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR**

OFFICE ORDER

This Officer order issued vide Endst No. 6352-56/F.No. A-32/MS/Transfer/Adjustment/KPK/2020 dated 10.01.2023, is hereby withdrawn in the interest of public service.

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst No. 1332-34/F.No. 05-A/Medical Board Retirement case.

Date Peshawar the 20.01.2022

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

1. Director Education Officer (Male/Female) Battabram.
2. District Education Officer Battagram.
3. Official concerned.
4. PA o Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
5. Master File.

Assistant Director (Admin)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Daily Attendance Register of the DECE

DATE AND HOURS

For the Month of January 2023

OF ATTENDANCE

(13)

Approved

Serial No.	Name	Rank	DATE AND HOURS																															Total No. of Days	Remarks	
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31			
1	Mr. Najim Khan	DDSO																																		
2	Abulhasan	ADSO																																		
3	Hasan	ADSO																																		
4	Farid Khan	ASST																																		
5	Baghwan Singh	ASST																																		
6	Kola	ASST																																		
7	Mulhamud Yusuf	SGT																																		
8	Mushtaq Khan	APP.																																		
9	Aad Khan	C.O.																																		
10	Mulhamud Jaanvi	CO.																																		
11	Akhtar Lakhan	PA.																																		
12	Mulhamud Shariq	SGT																																		
13	Shiraz Khan	SGT																																		
14	Sheer Muhammad	SGT																																		
15	Mulhamud Sadique	SGT																																		
16	Mulhamud Tariq	SGT																																		
17	Zashar	SGT																																		
18	Mulhamud Aod	SGT																																		
19	Shah Farooq	SGT																																		
20	Hassam Hussain	SGT																																		
21	Muhammad Shafiq	SGT																																		
22	Muhammad Khalid	SGT																																		
23	Muhammad Ali	SGT																																		
24	Muhammad Aod	SGT																																		
25	Muhammad Aod	SGT																																		
26	Muhammad Aod	SGT																																		
27	Muhammad Aod	SGT																																		
28	Muhammad Aod	SGT																																		
29	Muhammad Aod	SGT																																		
30	Muhammad Aod	SGT																																		
31	Muhammad Aod	SGT																																		

Daily Attendance Register for the Month of March 2023

Serial No.	Name	Rank	DATE AND HOURS																															Remarks	
			4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days				
1	Ahmed Aziz	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
2	Mansoor Ali	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
3	Syed Riaz Hussain Shah	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
4	Abulhasan Khan	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
5	Ali Yusuf	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
6	Muhammad	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
7	M. Javed Khan	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
8	Abdur Rahman	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
9	M. Shariq	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
10	Shiraz Khan	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
11	Shiraz Muhammad	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
12	M. Saqib	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
13	M. Tariq	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
14	Zahid	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
15	M. Akbar	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
16	Farid Hussain	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
17	Shah Faraz	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
18	M. Anwar	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
19	Enam Hussain	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
20	Shah Faraz	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
21	M. Anwar	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
22	M. Anwar	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
23	M. Anwar	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
24	Abulhasan Khan	DR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	

7.7.2

Handwritten signatures and initials at the bottom right of the register.

Daily Attendance Register of the DBM NO. 10112
 for the Month of March 23 2023

Serial No.	Name	P	OF ATTENDANCE											Total No. of Days	Remarks																					
			5	6	7	8	9	10	11	12	13	14	15			16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31					
1.	MR. MAISON KHAN	P																																		
2.	ABDUL HAKEEM	A																																		
3.	MAR NAWAZ	A																																		
4.	IMRANULLAH	A																																		
5.	S. BAIT ABUSAIN SWAN	A																																		
6.	ABDUL KASEEM	A																																		
7.	RATA	A																																		
8.	MUMTAZ KHAN	A																																		
9.	MURSHID ALAM	A																																		
10.	M. TANVIL KHAN	A																																		
11.	FAIZ HUSAIN	A																																		
12.	SHAH RUKH	A																																		
13.	Muhammad Sarif	A																																		
14.	Shiraz Khan	A																																		
15.	Shah Muhammad	A																																		
16.	Muhammad Qasim	A																																		
17.	Bakhtyar Muhammad	A																																		
18.	Muhammad Tariq	A																																		
19.	Zachary	A																																		
20.	Muhammad Akbar	A																																		
21.	Asghar Khan	A																																		
22.	SAIB KHAN	A																																		
23.	ABDUL KHAN	A																																		
24.	ASAD KHAN	A																																		

Daily Attendance Register of the Estt. DEO (B) for the Month of April / 2023
DATE AND HOURS OF ATTENDANCE

Serial No.	Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks		
01.	Md. Najmatshen.	DDEO																																			
02.	Abdul Hafeez	ADEO																																			
03.	Hazi Nawaz	ADEO																																			
04.	Isaacullah	ADEO																																			
05.	S. Riaz Hussain Shah	ASST.																																			
06.	Abdul Kareem	ASST.																																			
07.	Raja	Supt.																																			
08.	Muhammad Yousof	Supt.																																			
09.	Murshad Alam	C.O.																																			
10.	M. Jamil Khan	C.O.																																			
11.	Ataur Rehman	P.A.																																			
12.	Asad Khan	C.O.																																			
13.	M. Sharif	S/C																																			
14.	Shireen Khan	S/C																																			
15.	Shir Muhammad	S/C																																			
16.	Muhammad Saadique	S/C																																			
17.	Bakhtiar Muhammad	Asst.																																			
18.	M. Tariq	TE																																			
19.	Zeshan	TE																																			
20.	M. Asad	TE																																			
21.	Asar Hayat	TE																																			
22.	Shah Faraz	Dy. TE																																			
23.	Tajudin	TE																																			
24.	Abdur Rahman	Asst.																																			
25.	Wasim Khan	Asst.																																			

Handwritten signatures and initials at the bottom left of the page, including names like 'Mr. Tariq' and 'Mr. Asad'.

Daily Attendance Register of the DDO (EPM)
DATE AND HOURS
for the Month of May 2023
OF ATTENDANCE

Serial No.	Name	Rank	DATE AND HOURS																															Total No. of Days	Remarks		
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31				
01	Hst. Najma Khan	DDO									X																										
02	Shah Nawaz Khan	ADEC									X																										Other duty as per...
03	Hazir Nawaz	ADEC									X																										
04	Hasanullah	ADEC									X																										
05	Abdul Karim	Asst									X																										
06	Abdul Razaq	Asst									X																										
07	Raja	Asst									X																										
08	N. Young	Suplt.									X																										
09	N. Jamil Khan	C.O									X																										
10	Asad Khan	C.O									X																										
11	Alau Rehman	P.A									X																										
12	Shamin Khan	S/L									X																										
13	Taj-ud-din	S/L									X																										
14	Sherv Muhammad	S/L									X																										
15	N. Sadrulque	S/L									X																										
16	Bahitai Muhamm	S/L									X																										
17	M. Asad	J/L									X																										
18	C. Piro Hussain Sht										X																										
19	Muhsin Alam	Ch									X																										
20	Tareed Iqbal	DDO																																			
21																																					
22																																					
23																																					
24																																					
25																																					
26																																					
27																																					
28																																					
29																																					
30																																					
31																																					
32																																					
33																																					
34	Shahid Prasad	Suplt.									X																										

Daily Attendance Register of the DEPT OF CIVIL AND WORKS for the Month of JUNE 2023

No.	Name	Rank	DAYS OF THE MONTH																															Total No. of Days	Remarks
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31		
1	Shah Naveed	ASSISTANT	X																																
2	M. Yousaf	ASSISTANT	X																																
3	M. Yousaf	ASSISTANT	X																																
4	M. Yousaf	ASSISTANT	X																																
5	M. Yousaf	ASSISTANT	X																																
6	M. Yousaf	ASSISTANT	X																																
7	M. Yousaf	ASSISTANT	X																																
8	M. Yousaf	ASSISTANT	X																																
9	M. Yousaf	ASSISTANT	X																																
10	M. Yousaf	ASSISTANT	X																																
11	M. Yousaf	ASSISTANT	X																																
12	M. Yousaf	ASSISTANT	X																																
13	M. Yousaf	ASSISTANT	X																																
14	M. Yousaf	ASSISTANT	X																																
15	M. Yousaf	ASSISTANT	X																																
16	M. Yousaf	ASSISTANT	X																																
17	M. Yousaf	ASSISTANT	X																																
18	M. Yousaf	ASSISTANT	X																																
19	M. Yousaf	ASSISTANT	X																																
20	M. Yousaf	ASSISTANT	X																																

Daily Attendance Register of the Est. of D.O. for the Month of August 20 1953

Serial No.	Name	Rank	DATE AND HOURS																															Total No. of Days	Remarks
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31		
1	Naraina M.	D/O																																	
4	Umed Jhal	Asst.																																	
6	Abdul Karim	Asst.																																	
7	M. Jamil	S/O																																	
8	Munshid Khan	D/O																																	
9	Altaf Rehman	S/O																																	
10	Khan Khan	S/O																																	
11	Tejinder	S/O																																	
12	Abbas Rehman	S/O																																	
13	M. Ladique	S/O																																	
14	G. A. M. Akmal	S/O																																	
15	M. H. Khan	S/O																																	
16	M. H. Khan	S/O																																	
17	M. H. Khan	S/O																																	
18	M. H. Khan	S/O																																	
19	M. H. Khan	S/O																																	
20	M. H. Khan	S/O																																	
21	M. H. Khan	S/O																																	
22	M. H. Khan	S/O																																	
23	M. H. Khan	S/O																																	
24	M. H. Khan	S/O																																	
25	M. H. Khan	S/O																																	

(21)

App. of G

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The Honorable Director
Elementary and Secondary Education
K.P. Peshawar

Subject: - Release of pay / Withdrawal of order

R/Sir, it is stated with great vengeance that I was transferred by vide letter No 6352-56 dated: 10-01-2023, which was withdrawn your good office letter NO 1332-34 dated: 26-01-2023. However the concerned DEO (F) Battagram has not been released my salary since 02-01-2023 (6 months) without any reasons. I have submitted application to all quarters concerned time and to release my salary but all in vain. Furthermore despite to release my salary the concerned DEO (F) Battagram locally transferred / adjust me against the wrong post of Assistant Programmer (BPS-17) which is beyond her capacity in order to pursue your good office order NO. 2706-10 dated 5-5-2023.

Therefore you are requested to withdraw the office order NO 2706-10 dated 5-5-2023 and also direct the concerned DEO (F) Battagram to release my salary on the post of computer operator BPS-16 since 01-01-2023 please.

~~ASAD~~
Mumtaz
5/6/23

Thanking you
muhammed Asad Ichan
computer operator BPS-16
DEO (F) Battagram

Dated: - 05-06-2023

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

WAKALATNAMA
(Power Of Attorney)

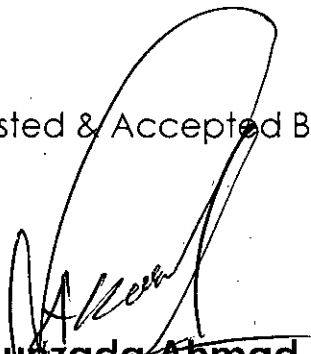
Muhammad Asad Khan (Petitioner)
(Plaintiff)
(Applicant)
(Appellant)
(Complainant)
(Decree Holder)

VERSUS

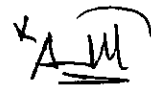
Secretary E&SE and others..... (Respondent)
(Defendant)
(Accused)
(Judgment Debtor)

I/ We, _____ The undersigned _____ in the above noted Service Appeal, do hereby appoint **Mr. Akhuzada Ahmad Saeed**, Advocate to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our counsel in the above noted case and with the authority to engage /appoint an other Advocate/Counsel on my/our behalf in my/our case and that my/our counsel will not appear whenever a strike call is made by the PBA, PHCBA, KP Bar Council, Pakistan Bar Council or by any other representative body of the lawyers' community, Furthermore, my/our counsel shall not be liable for any acts on my/our behalf, if I/we have furnished an incorrect information or mis-statement and that my/our counsel shall not be liable for any disciplinary action in case of his default in the aforesaid delegated authority, matter, without any liability for their default and with the authority to engage/ appoint any other Advocate/Counsel at my/our matter.

Attested & Accepted By.



Akhuzada Ahmad Saeed (bc-11-1885)
Advocate High Court, Peshawar
Office: 15-B, Haroon Mansion, Khyber Bazar,
Peshawar
Cell No.0333-2902529
CNIC No. 15705-5473448-3


Signature of Executants
Muhammad Asad Khan

Ahmad Saeed - ak - Ahmad Saeed@Yahoo.com