


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No.** 1954/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/09/2023	<p>The appeal of Mr. Noor ul Islam resubmitted today by Mr. Saadullah Khan Marwat Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>28-09-2023</u>.</p> <p>By the order of Chairman  REGISTRAR</p>

This is an appeal filed by Mr. Noor ul Islam today on 29/05/2023 against the order 18.05.2023 against which he made/preferred departmental appeal/representation on 22.05.2023 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/Counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Annexures of the appeal are unattested.
- 4- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1550/ST,

Dt. 30/5/2023.

*A. M.*

REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Saadullah Khan Marwat Adv.  
High Court Peshawar.

*Sir*  
Resubmitted after completion. As for as  
90 days duration is concerned, The Judgment  
2015 SCMR 456 so meets the requirement.  
placed before the Bench of  
submitted set.

*5/6/23*

*Sir,*

The objection of this office still stands. The reply of the learned counsel for the appellant is submitted for appropriate order, please.

*A. M.*  
9/6/23  
Assistant Registrar

Hon'ble Chairman

*Objecti sustained. Be  
advised for resubmission after  
maturity*

*[Signature]*

12/06/23 *1733*  
12/6/23

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

S.A No. *1957/2023*

Noor-ul-Islam

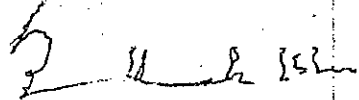
versus

Secretary & Others

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Through Appellant

  
Saadulien Khan Marwat  
Advocate.  
21-A Nasir Mansion,  
Shoba Bazaar, Peshawar.  
Ph: 0300-5872676

Dated: 29-05-2023

**BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR**S.A No. 1954 / 20231954

Noor-ul-Islam S/O Rajan Shah,  
Subject Specialist Chemistry,  
GHSS No. 03 Michan Khel.

Lakki Marwat . . . . . Appellant

**VERSUS**Khyber Pakhtunkhwa  
Service TribunalDiary No. 5645Dated 29/5/2022

1. Secretary, Government of KP,  
Elementary & Secondary  
Education Department, Peshawar.
2. Chief Secretary, Govt. of KP,  
Civil Secretariat, Peshawar.
3. Director Elementary & Secondary  
Education, KP, Peshawar.
4. Dr. Muhammad Zubair,  
Subject Specialist Chemistry,  
GHSS Abdul Khel, Lakki Marwat . . . . . Respondents

**APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT, 1974**  
**AGAINST OFFICE NOTIFICATION NO. SO (SM) E & SED**  
**/ 5-17 / 2023 / PT / SS DATED 18-05-2023 R. NO. 01**  
**WHEREBY APPELLANT WAS TRANSFERRED FROM GHSS**  
**MICHAN KHEL TO GHSS ABDUL KHEL LAKKI MARWAT**  
**AND R. NO. 04 WAS TRANSFERRED FROM GHSS ABDUL**  
**KHEL TO GHSS NO. 03 MICHAN KHEL AT THE POST OF**  
**APPELLANT FOR NO LEGAL REASON!**

**Respectfully Sheweth:**

1. That appellant was appointed as Secondary School Teacher (SST) (Sc) in the year 2011 and on satisfactory performances of the official duties, he was promoted to the post of Subject Specialist (SS) Chemistry B-17 on 15-06-2022.
2. That on 13-03-2023, R. No. 01 issued General Notification of Transfer and Posting whereby numerous posting and transfer of the official was made and name of appellant was figured at S. No. 11 in the same and was posted at GHSS No. 03, Michan Khel Lakki Marwat. This Notification was issued at the approval of Election Commission of Pakistan and Establishment Department Peshawar. (Copy as annex "A")
3. That after gap of two months, R. No. 01 issued subsequent Notification on 18-05-2023 wherein appellant was transferred from GHSS No. 03, Michan Khel Lakki Marwat to GHSS Abdul Khel and R. No. 04 was posted at GHSS No. 03, Michan Khel for no obvious reason. (Copy as annex "B")
4. That on 22-05-2023, appellant submitted representation before the respondents but no action was taken over the same till date. (Copy as annex "C")

Hence this appeal, inter alia, on the following grounds:-

**GROUND S:**

- a. That said Notification dated 18-05-2023 of R. No. 01 was motivated on the pressure of ~~major~~ to CM which is not in the interest of public but in the interest of R. No. 04.
- b. That the said Notification is not only against the Transfer / Posting Policy but also against the General Law of Posting / Transfer where normal tenure was three years which was not completed till then.
- c. That the impugned Notification is issued during ban period over Posting / Transfer where Election Commission has imposed ban on

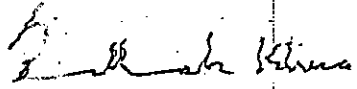
the same and even the said Notification is not signed by the authority but is issued by the Section Officer of the department.

- d. That Notification dated 18-05-2023 is based on political pressure and is not a normal transfer. The same is based on malafide and favoritism.

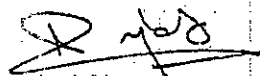
It is, therefore, most humbly prayed that on acceptance of the appeal, office Notification dated 18-05-2023 of R. No. 01 be set-aside and appellant be restored to his original post of SS Chemistry at GHSS Michan Khel Lakki Marwat with all service benefits.

  
Appellant

Through

  
Saadullah Khan Marwat

  
Arbab Saiful Kamal

  
Amirad Nawaz  
Advocates

Dated: 29-05-2023

### **CERTIFICATE:**

As per instructions of my client, no such like Service Appeal has earlier been filed by the appellant before this Honorable Tribunal.

  
Advocate

### **AFFIDAVIT**

I, Noor-ul-Islam S/O Rajan Shah, Subject Specialist Chemistry, GHSS No. 03 Michan Khel Lakki Marwat (appellant), do hereby solemnly affirm and declare that contents of Service Appeal are true and correct to the best of my knowledge and belief

  
DEPONENT



A 4  
GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. 991-9223633 Email: eschoolmale@gmail.com

Peshawar, Dated: 13<sup>th</sup> March, 2023

**NOTIFICATION**

**NO.SO(SM)E&SED/5-17/2023/PT/G:** Consequent Upon the approval of Election Commission of Pakistan vide letter No. F.10(1)2023-Elec-II dated 10-03-2023, and Establishment Department's letter No.SO(E-I)/E&AD/11-25/2023 dated 10-03-2023, the posting/transfer of the following Officers are hereby ordered with immediate effect, in the best public interest:

S.No	Name	Subject	From	TO	Remarks
1.	Muhammad Ghufan Ullah	SS Economics (BS-17)	GHSS Drsamand Hangu	GHSS Kotka Muhammad Khan Bara	AVP
2.	Amin Ullah	SS H/Civics ( BS-17)	GHSS Mohib Banda Mardan	GHSS Ternab Farm Peshawar	AVP
3.	Sardar Muhammad Mujahid	SS Urdu (BS-17)	Working in OPS Bihafi Mansehra	SS Urdu BS-17 GHSS Karori Mansehra	AVP
4.	Kaleem Ullah	SS Econmocs BS-17	GHSS Shamoza D.I.Khan	Head Master BS-17, GHS Gara Hayat D.I.Khan	AVP
5.	Muhammad Kamran Khan	SS Statistics BS-17	GHSS Payan Peshawar	GHSS Ternab Farm Peshawar	AVP
6.	Nasir Khan	SS Statistics (BS-17)	Ghss Manki Sharif Nowshera	GHSS Akbar Pura Noshera	AVP
7.	Asmat Ullah	SS Economics (BS-17)	GHSS Sinpora Swat	GCMHSS Wadudia Swat	AVP
8.	Rafi Ullah	SS H/Civics (BS-17)	GHSS Sheikhan Peshawar	GHSS Hayatabad Peshawar	AVP
9.	Musawir Jan	SS Economics (BS-17)	GHSS Baghicha Dheri Mardan	GHSS Chamtar Mardan	AVP
10.	Hafiz Azmat Ullah	SS H/Civics (BS-17)	GHSS Abdul Khel Lakki Marwat	GHSS No.3 Michen khel Lakki Marwat	AVP
11.	Noor ul Islam	SS Chemistry (BS-17)	GHSS Wanda Lali D.I.Khan	GHSS No.3 Michen khel Lakki Marwat	AVP
12.	Noor Ullah Jan	SS Pak-Study (BS-17)	GHSS Dargai Charsadda	GHSS Sufaid Sung Peshawar	AVP
13.	Rehman Shah	SS Maths (BS-17)	GHSS Jehangiri Karak	GHSS Tappi Kanda Karak	AVP
14.	Amjad Iqbal	SS Maths (BS-17)	GHSS Shamoza Swat	GHSS Aboha Swat	AVP



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Block-"A" District MPA's Hostel, Civil Secretariat Peshawar

Phone No. 091-9223633 Email: eschoolmale@unil.com

Peshawar, Dated: 13<sup>th</sup> March, 2023

15.	Muhammad Sohail Zada	SS Physics (BS-17)	GHSS Zakhi Qabristan Nowshera	GHSS No.04 Tank.	AVP
16.	Muhammad Sulaiman	SS Physics (BS-17)	GHSS Shahidan Banda Karak	GHSS Tappi Kanda Karak	AVP
17.	Muhammad Ali Saleem	SS Chemistry (BS-17)	GHSS Chodwan D.I.Khan	GHSS Lar D.I.Khan	AVP
18.	Muhammad Rafiq	SS Maths (BS-17)	GHSS Kurvi Nowshera	GHSS Shahbaz Khel Lakki Marwat	AVP
19.	Muqaddar Khan	SS Physics (BS-17)	GHSS Kurvi Nowshera	GHSS No.1 City Peshawar	AVP
20.	Mehboob Alam	SS Biology (BS-17)	GHSS Amnawar Buner	GHSS Bagra Bunner	AVP
21.	Hasnain Iftikhar	SS Statistics (BS-17)	GHSS Ismail Dag Khel Nowshera	GHSS Musazai Peshawar	AVP
22.	Amjad Ali	SS Statistics (BS-17)	GHSS Nowshera	GHSS Garhi Sher Dad Peshawar	AVP
23.	Muhammad Rehan	SS Statistics (BS-17)	GHSS Muhabbat Abad Mardan	GHSS Sheikhan Peshawar	AVP
24.	Muhammad Hanif	SS Urdu (BS-17)	GHSS Karori Mansehra	GHSS Lissan Takral Mansehra	AVP
25.	Saif Rehman	SS Statistics (BS-17)	GHSS Rich Bhen Abbottabad	GHSS Muslim Abad Abbottabad	AVP
26.	Shams Arifeen	SS Economics (BS-17)	GHSS Hathain Mardan	GHSS Mandani Charsadda	AVP
27.	Muhammad Abdullah Abid	SS Statistics (BS-17)	GHSS Kirri Khaisur D.I.Khan	GHSS Kural D.I. Khan	AVP
28.	Munir Khan	SS Economics (BS-17)	GHSS Nodeh Payan Peshawar	GHSS Hayatabad Peshawar	AVP
29.	Abid Musawir	SS Statistics (BS-17)	GHSS Jarid Mansehra	GHSS Sherpur Mansehra	AVP
30.	Inayat Rehman	SS H/Civics (BS-17)	GHSS Toru Malra Mardan	GHSS Hathian Mardan	AVP
31.	Khush Tajab	SS Biology (BS-17)	GHSS Lodhi Khel Hangu	GHSS Manduri Kohat	AVP
32.	Farmán Ullah	SS English (BS-17)	GHSS Kot Malakand	GHSS Sakha Kot Malakand	AVP
33.	Abdul Tawab	SS Pak-Study (BS-17)	GHSS Kando Khel Karak	GHSS Karak against Senior Librarian OPS	AVP
34.	Amin Shah	SS Maths (BS-17)	GHSS Khairabad Mardan	GHSS Muslimabad A.abad	AVP

*Atta*

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Peshawar, Dated: 13<sup>th</sup> March, 2023

35.	Said Muhammad	SS English (BS-17)	GHSS Baghicha Dheri Mardan	GHSS No.1 Bicket Gunj Mardan	AVP
36.	Tariq Zaman	SS Biology (BS-17)	GHSS Dakki D.I. KHAN	GHSS No.1 Paharpur, D.I.Khan	AVP.
37.	Muhammad Inam Ullah Khan	SS Biology (BS-17)	GHSS Bagh Bunner	GHSS Torwarsak Buner	AVP
38.	Muhammad Ismail	Headmaster (BS-17)	GHS Turiandi Charsadda	GHS Wardaga Charsadda	AVP
39.	Israr Ali Khan	SS Chemistry (BS-17)	GHSS Shagai Swat	GHSS Khar Malakand	AVP
40.	Rab Nawaz Khan	SS Chemistry (BS-17)	GHSS Gumbat Mardan	GHSS Mazdoor Abad Mardan	AVP
41.	Imran Khan	SS Urdu (BS-17)	GHSS Fatma Mardan	GHSS Shamtar Mardan	AVP
42.	Raza Khan	SS Pak-Study (BS-17)	GHSS Mazdoor Abad Mardan	GHSS Sher Garh Mardan	AVP
43.	Barkat Ali Khan	SS H/Civics (BS-17)	GHSS Ramak D.I.Khan	GHSS.No.3 D.I.Khan	AVP
44.	Sultan Ali	SS Economics (BS-17)	GHSS Barawal Matta Swat	GHSS Dherai Swat	AVP
45.	M.Shahab Mazhar	SS Pak-Study (BS-17)	GHSS Domel Bannu	GHSS Painda Khel Bannu	AVP
46.	Abdul Basit	SS English (BS-17)	GHSS Mohar Mansehra	GHSS Sherpur Mansehra	AVP
47.	Malik Nawaz Khan	SS (English) GHSS	GHSS Aba Khel Lakki Marwat	GHSS Bangi Khan Khujri Bannu	AVP
48.	Syed Muhammad Raza Shah	SS Islamiyat (BS-17)	GHSS Sama Badher Peshawar	GHSS No.2 Peshawar City	AVP
49.	Shakir Rehman	SS Physics (BS-17)	GHSS Khanjer Mardan	GHSS Manga Mardan	AVP
50.	Najmullah Khan	SS Biology (BS-17)	GHSS Shahbaz Khel Lakki Marwat	SS GHSS Bangi Khan Bannu	AVP
51.	Arshad Iqbal	SS English (BS-17)	GHSS Muryall D.I.Khan	GHSS Kachi Paind Khan D.I.Khan	AVP
52.	Naveed Ahmad	SS English (BS-17)	GHSS Boobak Charsadda	GHSS No.1 Charsadda	AVP



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Peshawar, Dated: 13<sup>th</sup> March, 2023

53.	Farzan Ullah Khan	SS English (BS-17)	GHSS Shabaz Khel Lakki Marwat	RPDC(M, Bannu	AVP
54.	Shoaib Hassan	SS Physics (BS-17)	GHSS Thakra Mansehra	GHSS Suer pur Mansehra	AVP
55.	Zahid Shah	Headmaster (BS-17)	GHS Inzari Nowshera	GHS Sanga Mardan	AVP
56.	Hafiz Muhammad Zulqarnain	SS Economics (BS-17)	GHSS Ramak D.I.Khan	GHSS Dahan Khurd D.I.Khan	AVP
57.	Muhammad Nawaz	SS H/Civics (BS-17)	GHSS Muhammad Khawaja Hangu	GHSS No.3 Michan Khel Lakki Marwat	AVP
58.	Sarhad Ali Shah	SS H/Civics (BS-17)	GHSS Gul Imam Tank	GHSS Panda Khel Bannu	AVP
59.	Waqas Ahmad	SS Biology (BS-17)	GHSS Bagnoter Abbotabad	GHSS Hano Abbottabad	AVP
60.	Fakhar Riaz	SS Statistics (BS-17)	GHSS Sufaid Sung Peshawar	GHSS No.2 Peshawar City	AVP
61.	Imtiaz Ali	SS Pak-Study (BS-17)	GHSS No.2 Nowshera Cantt	GHSS Pindi Lalma Khyber	AVP
62.	Essa Khan	SS Chemistry (BS-17)	GHSS Boobak Charsadda	GHS Marwani Charsadda	AVP
63.	Manzoor Ahmad	SS Biology (BS-17)	GHSS Pindi Lalma Khyber	GHSS Muzai Tank	AVP
64.	Kashif Waheed	SS English (BS-17)	GHSS Shah Salim Karak	GHSS Topi Kanda Karak	AVP
65.	Nadeem Ahmad	SS Maths (BS-17)	GHSS Bakhshall Mardan	GHSS No.1 Charsadda	AVP
66.	Nashid Ullah Khan	SS Chemistry (BS-17)	GHSS Darsamand Hangu	GHSS Dabl Lawagher Karak	AVP
67.	Khad Mast	SS English (BS-17)	GHSS Haryana Bala Peshawar	GHSS Hazar Khwani Peshawar	AVP
68.	Nauman Yousaf	SS English (BS-17)	GHSS Naseer Killi Mardan	GHSS Mazdoor Abad Mardan	AVP
69.	Muhammad Younas	IPE (BS-17)	GHSS Uror	GHSS Mama Khel Bannu	AVP
70.	Yasir Inan	SS (English) (BS-17)	GHSS Kech D.I.Khan	GHSS Kechi Pind D.I.Khan	AVP
71.	Muhammad Parooz	IPE (BS-17)	GHSS Marghuz Swabi	SIPE GHSS Kech D.I.Khan	AVP
72.	Muhammad Noor Rehman	Headmaster (BS-17)	GHSS Kurram Karak	GHS Kori Sadat Bannu	AVP
73.	Tahir Rahman	SS (Pashlu) (BS-17)	GHSS Jehangiri	GHSS Bogara Karak	AVP
74.	Arif Zaman	SS H/Civics (BS-17)	GHSS Togh Sarai	GHSS Kohat	AVP

*Attended*



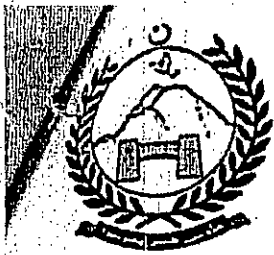
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Peshawar, Dated: 13<sup>th</sup> March, 2023

75.	Sakhi Zaman	SS H/Civics BS 17	GHSS Choralaki Kohat	GHSS Wainoor Jani Khel	AVP
76.	Arshad Nawaz Khan	SS English BS-17	GHSS Abulul Lakki Marwat	GHSS No. 17 (BS-17) RPDC Bannu	AVP
77.	Sadaqat Khan	IPE BS-17	GHSS Gat Swat	GHSS Adozal Peshawar	AVP
78.	Aftab Hussain	Head Master BS-17	GHS Khawrai Nowshera	Headmaster BS-17 GHS Pahari Peshawar	AVP
79.	Shah Mehmood	SS H/C BS-17	GHSS Abba khel Lakki Marwat	Principal GHSS Abu Khan SDW	AVP
80.	Tahseen ullah Shah	SS Urdu BS-17	GHSS Mohib Banda Mardan	GHSS Hafiz Mardan	AVP
81.	Umar Ali Khan	SS English BS-17	GHSS Warana Karak	GHSS Farda Khel Bannu	AVP
82.	Manzoor Khan	SS English B-17	GHSS Nisata Charsadda	GHSS Hatyan, Mardan	AVP
83.	Zia Ullah	SS Economics BS-17	GHSS Kot Malakand	GHSS Sakina Kot Malakand	AVP
84.	Fida Muhammad	SS Pak Study B-17	GHSS Sherpao Charsadda	GHSS Umarzal Charsadda	AVP
85.	Shahan Yaqoub	SS Biology BS-17	GHSS Urmar Payan Peshawar	GHSS Wazir Bagh Peshawar	AVP
86.	Bahadur Khan	Headmaster (BS-17)	GHS Azeem Kor Mohmand	GHS Shahbaz Khan Kor Charsadda	AVP
87.	Luqman	SS Maths B-17	GHSS Palinda Khel Bannu	GHSS Shaheedan Karak	AVP
88.	Rafiq	SS Economic B-17	GHSS Togh Sarai Hangu	GHSS Gurguri Karak	AVP
89.	Sultan Mehmood	IPE B-17	GHSS Togh Sarai Hangu	GHSS Surgul Kohat	AVP
90.	Nabi Ur Rehman	SS Rashio BS-17	GHSS Pingal Lower Dir	GHSS Jehangiri Karak	AVP
91.	Akhtar Zaman	SS Biology BS-17	GHSS Charlaki Kohat	GHSS Gurguri Karak	AVP
92.	Ihsan Ullah	SS Maths BS-17	GHSS Togh Sarai Hangu	SS GHSS Karak	AVP
93.	Umier Farooq	SS Statistics BS-17	GHSS Shahidan Bada Karak	GHSS Warana Karak	AVP
94.	Fahim Ullah	SS Statistics BS-17	GHSS Warana Karak	GHSS Bogara Karak	AVP
95.	Syed Anwar	SS H/Civics B-17	GHSS Khanjar Mardan	GHSS Bicket Gunj No.1 Mardan	AVP
96.	Muhammad Aftab Alam	SS Chemistry B-17	GHSS Chorlaki Kohat	GCHSS Kohat	AVP

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GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
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Peshawar, Dated: 13<sup>th</sup> March, 2023

97.	Jamshid Ullah	SS Maths B-17	GHSS Shahpur Shangla	SS Maths GHSS Jandral Karak	AVP
98.	Kifayat Ullah	SS English BS-17	GHSS Jehngiri Karak	GHSS Jehngiri Karak	AVP
99.	Ghani Rahman	SS Phyics BS-17	GHSS Sufiad Sang Peshawar	GHSS Razi Peshawar	AVP
100.	Llaqat Ali Shah	SS Physics B-17	GHSS Doaba Hangu	As Instruktur B-17 at RPDC Kohat	AVP
101.	Muhammad Zahid	SS English B-17	GHSS Masha Mansoor Lakki Marwat	GHSS No.3 Lakki Marwat	AVP
102.	Layiq Zada	SS Chemistry BS-17	GHSS Akhgram Dir Upper	GHSS Rabat Dir Lower	AVP
103.	Kamran	SS H/Civics BS-17	GHSS Dherai Swat	GCMHSS Wadudia Swat	AVP
104.	Tariq ur Rehman	SS Economics BS-17	GHSS Sudai Kohat	GHSS Sarda Khuram Karak	AVP
105.	Sattar Khan	SS English BS-17	GHSS Baka Khel Bannu	GHSS Lalzai Bannu	AVP
106.	Farhat Ullah Khan	SS Biology BS-17	GHSS Kirri Khaisori D.I.Khan	GHSS Landiwa Lakki Marwar	AVP
107.	Samir Ullah	SS H/Civics BS-17	GHSS Kando Khel Karak	GHSS Tappi Kanda Karak	AVP
108.	Hafeez Ullah	SS Statistics BS-17	GHSS Nandraka Kohat	GHSS Kohat	AVP
109.	Ibrar Gul	SS Physics BS-17	GHSS Lagrial Abbottabad	GHSS Pawa Abbottabad	AVP
110.	Rizwan Ali Khan	SS English B-17	GHSS Garhi Habibullah Working in OPS BS-18	SS English B-17 GHSS Garhi Habibullah Mansehra	AVP
111.	Rashid Ahmad	SS English B-17	GHSS Shadi Khel Kohat	GHSS Shahsalim Karak	AVP
112.	Intekhab Gul	IPE BS-17	GHSS Matta Swat	GHSS Gurguri Karak	AVP
113.	Muhammad Sharif	SS Physics BS-17	GHSS Jandral Karak	GHSS Nari Fanos Karak	AVP
114.	Muhammad Ismail	SS Maths B-17	GHSS Gumbat Kohat	Headmaster GHS Dab Sangini Karak	AVP
115.	Habib Ullah	SS H/Civics B-17	GHSS Mulakand	GHSS Pir Sarif Mardan	AVP
116.	Umer Shahi	SS Pashto B-17	GHSS Muhabbat Abad Mardan	GHSS Pir Sadi Mardan	AVP

*Ad-A-92*

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10  
**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
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Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-9223633 Email: [sec.schoolmale@gmail.com](mailto:sec.schoolmale@gmail.com)

Peshawar, Dated: 13<sup>th</sup> March, 2023

117.	Imtiaz Wali	SS English BS-17	GHSS Dagi Banda Nowshera	GHSS Suraid Sung Peshawar	AVP
118.	Fazal Rahim	SS Islamiyat BS-17	GHSS Pingal Dir Lower	GHSS Mian Barangola Dir Lower	AVP
119.	Naqib Ullah	SS Maths BS-17	GHSS Abdul Khel D.I.Khan	GHSS Yarik D.I.Khan	AVP
120.	Atta Ullah	SS Biology BS-17	GHSS Bahder Karak	GCMHSS Kohat	AVP
121.	Shabir Ahmad	SS English BS-17	Bagh Dushkhela Dir Lower	GHSS Zierat Talash Dir Lower	AVP
122.	Arif Zaman	SS Biology (BS-17)	GHSS Sheikh Jana Swabi	GHSS Dagal Swabi	AVP
123.	Mustafa Kamal	SS Maths BS-17	GHSS Jandrai Karak	GHSS Sarda Khurram Karak	AVP
124.	Mohibullah	SS English BS-17	GHSS Sarda Khurram Karak	GHSS Panda Khel Bannu	AVP
125.	Mir Said Khan	Head Master BS-17	GHS Darpa khel NWTD	GHS Muhammad Nawaz Kot South Waziristan	AVP
126.	Shah Diaz Khan	SS Physics BS-17	Principal BS-18 GHSS Khidri Muhammad Khel Bannu	GHSS Bangi Khan, Bannu	AVP
127.	Muhammad Ijaz	SS H/Civics BS-17	GHSS Adezai Peshawar	GHSS Shikhan Peshawar	AVP
128.	Ahmad Ullah	SS Istamiyat BS-17	GHSS Preit	GHSS Bamborait Chitral	AVP
129.	Aman Ullah	SS English BS-17	GHSS Gul Imam-Tank	GHSS Shabaz Azmat Khel Bannu	AVP
130.	Muh Irfan	SS Pak Study BS-17	GHSS Surgul	GCHSS Kohat	AVP
131.	Aftab UI Hassan	SS Pak Study BS-17	GHSS Sudan Kohat	GHSS Sarda Kurram Karak	AVP
132.	Muhammad Danish	SS Islamiyat BS-17	GHSS Kori	RPDC DI Khan	AVP
133.	Said Kamal	SS Biology BS-17	GHSS Jhandri Karak	GHSS Warana Karak	AVP
134.	Afraz Khan	SS Economics BS-17	GHSS Satora Abbottabad	RPDC (M) Bannu	AVP
135.	Barkat Ali	SS Biology BS-17	GHSS Mullah UI Khan	SS GHSS Shahbaz Azmat Khel Bannu	AVP
136.	Muhammad Younus	IPE BS-17	GHSS Utroor Swat	GHSS Lachi Kohat	AVP
137.	Zahid Ullah	SS Chemistry BS-17	GHSS Narshale Mardan	GHSS Khangar Mardan	AVP
138.	Dr. Saeed Umar	SS Physics BS-17	GHSS Sarda Karak	GHSS Nari Panos Karak	AVP

**SECRETARY TO GOVT. OF KHYBERPAKHTUNKHWA  
E&SE DEPARTMENT**

*Adi*

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**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-2221222 Email: sec@eolmale@omll.gov

Peshawar, Dated: 13<sup>th</sup> March, 2023

**Endst: of even No. & Date**

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director, EMIS E&SE Department.
4. District Education Officer (M) Concerned.
5. District Accounts Officer Concerned.
6. Principal Concerned.
7. PS to Adviser to Chief Minister for E&SE Department.
8. PS to Secretary E&SE Department.
9. PA to Deputy Secretary (Estab) E&SE Department.
10. Officer Concerned.
11. Office order file.

**SECTION OFFICER (SCHOOLS MALE)**  
13/03/2023  
(TAJ MUHAMMAD)

**SCHOOLS MALE**

*Accepted*



GOVERNMENT OF PUNJAB  
 ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
 Block 'A' Opposite MPA's House, Sector 17, Chandigarh  
 Punjab, India

Punjab, India 5-23

**EDUCATION**

**SCIENTIFIC SUBJECTS - CHEMISTRY** The following...  
 (Main effort in the best public interest)

No	Name	Subjects	From	To	Remarks
	Dr. Muhammad Zubair	SS Chemistry (BES-17)	GHS Lakki Marwat	GHS Lakki Marwat	Against...
	Mr. Iqbal Khan	SS Chemistry (BES-17)	GHS Lakki Marwat	GHS Lakki Marwat	Against...

SECRETARY TO GOVT. OF PUNJAB  
 EDUCATION DEPARTMENT

Order No. & Date

Copy forwarded to the:

- Accountant General, Punjab
- Director, D.S.E. Punjab
- Director, E.M.S. Punjab
- District Education Officer, Jalandhar
- District Accounts Officer, Jalandhar
- Principal, Concerned
- PS to Administration, Jalandhar
- PS to Secretary, Education Department
- Secretary, Education Department
- Officer-in-Charge, Jalandhar
- Officer-in-Charge, Jalandhar

*(Handwritten signature)*

(ABDUL ILAQ)  
 SECTION OFFICER (SCHOOLS)

*(Handwritten signature)*

C 13

To,

1. Chief Secretary, Govt. of KP,  
Civil Secretariat, Peshawar.

Regy No 1523  
23-5-23

2. Secretary; Govt. of KP,  
Elementary and Secondary  
Education Department,  
Peshawar.

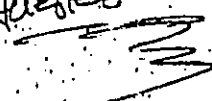
Regy No. 1522  
23-5-23

**Subject:**

APPEAL AGAINST OFFICE NOTIFICATION, DATED 18-05-2023 OF THE WORTH SECRETARY EDUCATION WHEREBY I WAS TRANSFERRED FROM GHSS NO. 03 MICHAN KHEL LAKKI TO GHSS ABDUL KHEL AND DR MUHAMMAD ZUBAIR WAS POSTED AT MY PLACE AT GHSS NO. 03 MICHAN KHEL LAKKI.

Respectfully Sheweth,

1. That I was appointed as Secondary School Teacher (SST) (Sc) in the year 2011 and on satisfactory performances of my official duties, I was promoted to the post of Subject Specialist (SS) Chemistry B-17 on 15-06-2022.
2. That on 13-03-2023, Secretary Education issued General Notification whereby numerous posting and transfer was made and my name was figured at S. No. 11 and was posted at GHSS No. 03, Michan Khel Lakki Marwat. This Notification was issued at the approval of Election Commission of Pakistan and Establishment Department Peshawar.
3. That after gap of two months, Secretary Education issued subsequent Notification on 18-05-2023 wherein I was transferred from GHSS No. 03, Michan Khel Lakki Marwat to GHSS Abdul Khel and Dr. Muhammad Zubair was posted at my post at GHSS No. 03, Michan Khel for no reason.
4. That the said Notification, dated 18-05-2023 of the Secretary Education Peshawar was motivated on the pressure of advisor to CM which is not in the interest of public but in the interest of Dr. Muhammad Zubair.

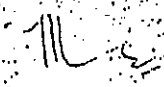
*Accepted*  




- 5. That Notification dated 18-05-2023 is not only against Transfer / Posting Policy but also against the General Law of Posting / Transfer where normal tenure was not completed.
- 6. That the impugned Notification is issued during ban period over Posting / Transfer and is not signed by the authority.
- 7. That Notification dated 18-05-2023 is based on political pressure and is not a normal transfer. The same is based on malafide and favoritism.

It is, therefore, most humbly requested that Notification dated 18-05-2023 be cancelled / withdrawn and I be restored to my original post of SS Chemistry at GHSS No. 03, Michan Khel Lakki Marwat with all service benefits.

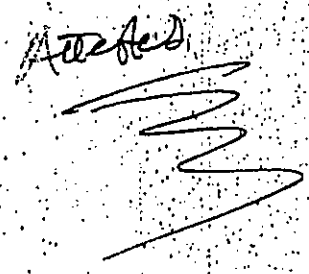
Applicant



Noor-ul-Islam S/o Rajan Shah

Subject Specialist (Chemistry)  
 GHSS No. 03 Michan Khel,  
 Lakki Marwat.  
 Cell No. 0346-9517207

Dated 22-05-2023



**BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR**

CM. No. \_\_\_\_\_ /2023

Noor-ul-Islam

versus

Secretary & Others


**APPLICATION FOR SUSPENSION OF OFFICE ORDER  
DATED 18-05-2023 TILL THE DECISION OF THE CASE:**


**Respectfully Sheweth:**

1. That applicant filed the subject Appeal before this hon'ble Tribunal today.
2. That no reason in order of transfer is given but the same was made in the interest of R. No. 04 and not in the interest of General Public.
3. That the impugned order is passed against the instruction of Election Commission where Posting and Transfer was made ben.
4. That the Impugned transfer order is against the Transfer and Posting Policy where normal tenure has not been completed. The said order was not signed by the competent authority.
5. That prima facie case exists, balance of convenience lies in favor of applicant and is hopeful of the success of the appeal.
6. That facts and grounds of the appeal be treated as integral part of this application for grant of Interim relief.

It is, therefore, requested that order dated 18-05-2023 be suspended till the decision of the case.

Through

  
Applicant

  
(Saadullah Khan Marwat)  
Advocate

**BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR**

C.M. No. \_\_\_\_\_ /2023

Noor-ul-Islam

versus

Secretary &amp; Others

**AFFIDAVIT**

I, Noor-ul-Islam, Applicant, do hereby solemnly affirm and declare that contents of **Application** are true and correct to the best of my knowledge and belief.

  
DEPONENT

بعد الت جتای سرس طرہ برہنہ صوبہ سندھ پٹنہ اور

منجانب ایڈووکیٹ

بنام صاحب قلم

نور الاسلام

دعویٰ اپیل

باجواب

مقررہ مندرجہ عنوان بالا میں ایسی طرف سے واسطے پیروی و جواب دہی دکن کاروائی متعلقہ آن مقام پٹنہ اور  
کیسٹم سٹیشن اڈاٹا خان سرورڈنٹے ایڈووکیٹ، ہائی کورٹ کو دیکل مقررہ کیے اقرار کیا جاتا ہے کہ صاحب  
موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب کو کہتے رہیں اور دفتر ثالثہ وغیرہہ برتلاف  
یہ جواب دہی اور اقبال دعویٰ اور لکھنؤ ڈگری کرنے اجراء اور وصولی چیک دردیہ اور مرضی دعویٰ اور درخواست  
پر قسم کی تصدیق اور ان پر دستخط کرانے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی  
اور دستخطی نیز دائر کرنے اپیل نگران و پٹنہ والی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ منکر  
کے کل یا پیروی کاروائی کے واسطے اور دیکل یا نفاذ قانونی کو اپنے ہمراہ یا اپنی بجائے تفریحا اختیار ہوگا  
الار صاحب مقررہ شاہ کو بھی وہی حوالہ مندر کردہ بالا اختیارات حاصل ہوں گے اور اس کا ساتھ برواختہ منظور  
قبول ہوگا اور دوران مقدمہ میں جو شرحیہ و ہرجانہ التوا مقدمہ کے سبب سے ہوگا اس کے مستحق وکیل صاحب  
موصوف ہوں گے نیز نفاذ دفعہ پنہ کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی مارتخ پیشی مقام درجہ  
پیروی یا عد سے باہر ہو تو وکیل صاحب یا مندرجہ ہوں گے کہ پیروی مندر کردہ کریں  
لہذا نکالت نامہ رکھو یا کہ مندر ہے۔

المرقوم 23-05-29

الحکم القصد القصد

ارباب سید اسماعیل  
ایڈووکیٹ

سید محمد جمال  
ایڈووکیٹ

محمد نواز  
ایڈووکیٹ

اصوات