

23.9.2013

No one is present on behalf of the appellant. Mr. Iqbal Jehan, Head Master on behalf of respondent No.3 with AAG for official respondents present. Respondent No.3 is not present despite direction to that effect in the order sheet <sup>dated</sup> 01.07.2013. Respondent No.3 be summoned in person with warning of stern action for further proceedings/further preliminary hearing at camp court Swat on 04.11.2013.

Chairman

4.11.2013

Appellant with counsel and Mr. Abdullah, DEO Swat (Respondent No.3) in person on his own behalf and on behalf of rest of the respondents with Mr. Niaz Ali, Spl.G.P present. Respondent No.3 pointed out that contrary to the claim of the appellant that he has frequently been transferred, the appellant is serving in GHS Kanju since 2009 and that GHS Kanju is situated at a distance of hardly 4 k.m from Faizabad where the appellant wants his posting.

In any case, this is a case of transfer/posting against a particular post, which is clearly barred under the provision of Section 4(b)(1) of the NWFP(KPK) Service Tribunal Act, 1974. Additionally, the departmental appeal, as alleged by the appellant in the appeal, was preferred on 28.5.2012, but no appeal was lodged after the expiry of statutory period, and this appeal was lodged beyond the period of limitation, on 30.01.2013.

The appeal, as such, is neither maintainable nor within time. Consequently, the appeal is dismissed in limine.

ANNOUNCED

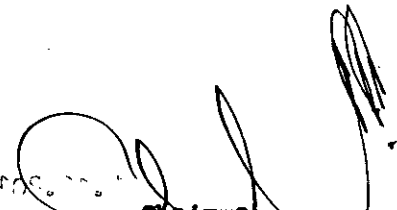
04.11.2013

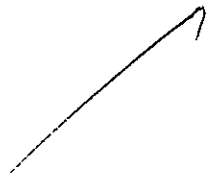
CHAIRMAN  
Camp Court Swat

01.07.2013

Appellant with counsel and Mr. Abdul Aziz-

Shaheen, ADO for respondents with Mr. Muhammad Zubair, Sr. GP present. Appellant produced certain documents showing his frequent transfers in order to adjust people against posts vacated due to his transfers on political consideration. The DEO, E&SE, Swat (Respondent no.3) be, therefore, summoned in person alongwith record showing transfers of the appellant for further preliminary hearing at camp court Swat on 12.8.2013.

  
Chairman  
Camp Court Swat

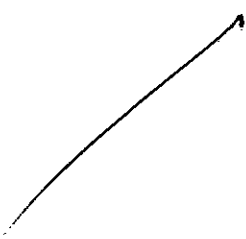


7.8.2013

Due to Eid-ul-Fitar, case is adjourned for proceedings as

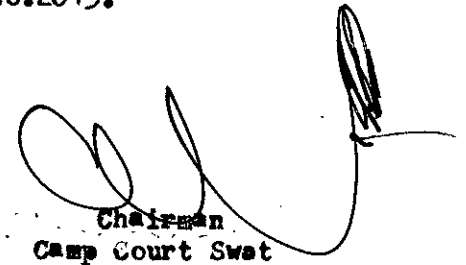
before, on 23.9.2013

  
Reader



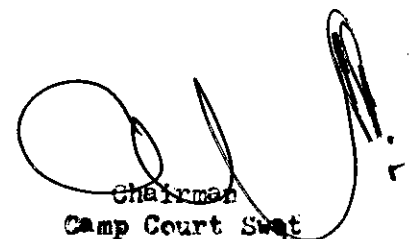
5. 6.5.2013

Appellant with counsel present and heard. In view of the fact that the appeal has been lodged for posting/transfer against a particular post and there is no final order against the appellant, the learned counsel for the appellant would prepare arguments on maintainability of the appeal in view of the bar contained in Section 4(b)(i) of the Service Tribunal Act, 1974. To come up for further preliminary hearing at camp court Swat on 3.6.2013.

  
Chairman  
Camp Court Swat

6. 3.6.2013

Appellant with counsel present and heard. As the appellant is seeking his adjustment/transfer to a nearby place after serving at far-flung places since his joining the service, a pre-admission notice be issued to the DEO, E&SE, Swat at Gul Kade Swat for production of service record of the appellant for further preliminary hearing at camp court Swat on 01.7.2013.

  
Chairman  
Camp Court Swat

~~Handwritten notes and signatures, mostly illegible and crossed out.~~





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Form- A

FORM OF ORDER SHEET

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

Case No. 404/2013

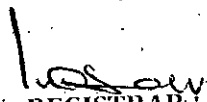
S.No.	Date of order Proceedings.	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	15/02/2013	<p>The appeal of Mr. Siraj-ud-Din resubmitted today by Mr. Attaullah Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	22-2-13	<p>This case is entrusted to Touring Bench Swat for preliminary hearing to be put up there on <u>04-03-2013</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
3	4.3.2013	<p>No one is present on behalf of the appellant. Notices be issued to the appellant and his counsel for preliminary hearing at camp court Swat on 01.4.2013.</p> <p style="text-align: right;"> Member Camp Court Swat</p>
4	01.4.2013	<p>No one is present on behalf of the appellant. Notices have not been issued to the appellant and his counsel in time. Therefore, fresh notices be issued to the appellant and his counsel for preliminary hearing at camp court Swat on 6.5.2013.</p> <p style="text-align: right;"> Chairman Camp Court Swat</p>

The appeal of Mr. Siraj-ud-Din PET received today i.e. on 30/01/2013 is incomplete on the following scores which is returned to the counsel for the appellant for completion and resubmission within 15 days:-

- 1- Copy of impugned order is not attached with the appeal which may be placed on it.
- ✓ 2- Affidavit may be got attested by the Oath Commissioner.
- ✓ 3- Annexures of the appeal may be attested.
- ✓ 4- Six more copies/sets of the appeal alongwith annexures i.e. complete in all respect may also be submitted with the appeal.

No. 232 /S.T,

Dt. 31/11 /2013.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

MR. ATTA ULLAH KHAN ADV. SWAT.

① Copy of impugned order is placed on  
file as annex "A"



BEFORE THE CHAIRMAN, SERVICE TRIBUNAL KHYBER PAKHTUNKHWA  
AT PESHAWAR

Service appeal No. 404 2013

Siraj Ud Din PET Government High School Kanju Tehsil Kabal District Swat.

.....(Appellant)

VERSUS

Chief Secretary Government of Khyber Pukhtoon Khwa and others.

.....(Respondents)

INDEX

S. #	Description of Documents	Annexures	Pages
1.	Memo of instant appeal and affidavit		1-15
2	Copy of Transfer order	A	6
3	Copy of departmental application	B	7
4	Copy of the said reminder	C	8
5	Copy of said appeal	D	9-13
5	Copy of said reminder	E	14
6	Wakalat Nama		

APPELLANT

Siraj Ud Din PET Government High School  
Kanjo Tehsil Kabal District Swat.

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

Service appeal No 404 2013

A. W. J. Peshawar  
Secretary  
No. 320  
30/1/13

Siraj Ud Din PET Government High School Kanju Teshsil Kabal District Swat.

.....(Appellant)

**VERSUS**

1. Chief Secretary Government of Khyber pukhtoon Khwa.
2. D.C.O District Swat at Gul Kada Saidu Sharif Swat
3. E.D.O (E&S) Education District Swat at Gul Kada Swat.
4. Mr. Jawad PET GMS Faiz Abad Saidu Sharif Swat.

.....(Respondents)

appeal against the act of omission to dispose of departmental petition filed before Chief Secretary Khyber Pukhtoon Khwa dated 21/9/2012, preferred against the transfer order Endst. No 2785-90/PET/AT(M) date 24/5/2012 of E.D.O Swat vide which the legal right of Appellant was infringed and one Mr. Jawad was unlawfully, illegally and on the bases of political approach, transferred to the nearest is vacant post to the Appellant in GMS Faiz Abad Saidu Sharif Swat.

As the last reminder has been filed before chief secretary on date 25/12/2012, therefore instant appeal is within time.

~~Handwritten signature~~  
30/1/13

**PRAYER:**

On acceptance of instant appeal the impugned order mention above may

be set aside and the Appellant may kindly be transfer to the said post.  
and filed.

~~Handwritten signature~~  
15/2/13

Respectfully Sheweth:

**Brief facts:**

1. That the applicants belongs to Saidu Sharif Swat and joined education department as PET on 14/2/1997 and posted in government High School lelawnai District Shangla.
2. That after six months of performing sincere duties / services the applicants was transferred to government High School Amnavi District Shangla.
3. That the Appellant was again transferred to High School Kotanai Tehsil Khwaza Khela Distric Swat dated 01/5/2000.
4. That the Appellant performed his duties with full professional devotion and honesty for 9 year in the said school in thereafter transferred to Government High School Kanjo on date 01/4/2009, where the Appellant is performing his duties till date.
5. That the Appellant has been performing his duties since 1997 at different peripheries and several far flung , hard stations.
6. That due to sincere and punctual duties the Appellant is entitled to be transferred to the nearest vacant post according to the policy.
7. That recently GPS Faiz Abad Saidu Sharif Swat has been upgraded to GMS Faiz Abad Swat and the position of PET was vacant in the said school to which one Mr. Jawad who was appointed as PET in GHS Shawar District swat on 01/02/2010 (Respondent No 3) was unlawfully, illegally transferred on the bases of political consideration. (Copy of Transfer order annexed herewith as annexure A).



8. That the Appellant filed a petition before the respondent No 2 on date 28/5/2012 against the illegal unlawful order of respondent No 3. (Copy of departmental application is annexed herewith as annexure B).
9. That the respondent No 2 sent the same petition to respondent No 3 for necessary action but after laps of limitation the respondent No 2 & 3 are reluctant to dispose of the petition.
10. That after the laps of time period for disposing of appeal the appellant filed a reminder before respondent No 2 on date 28/8/2012 but in vain. (Copy of the said reminder is attached herewith as annexure C).
11. That afterward the appellant filed a departmental appeal before chief secretary (Respondent No 1) on dated 21/09/2012. (Copy of said appeal herewith as annexure D).
12. That after the laps of time period of three months of disposing of limitation the appellant filed a reminder before Respondent No 1 on dated 25/12/2012, but in vain. (Copy of said reminder herewith as annexure E).
13. That the instant appeal has been filed on the following grounds amongst others.

GROUND:

- i. That the respondent No 2 & 3 are not interested to dispose of instant petition, while the time period for disposing of the said petition is three months which is already been lapsed.

- ii. That the Appellant filed a reminder to respondent No 1 for necessary action dated 25/12/2012 but till now no necessary action has been taken.
- iii. That the transferred of respondent No 4 against the vacant post in GMS Faiz Abad Saidu Sharif Swat is illegal, unlawful and against the policy and rules regulation of transfer of education department.
- iv. That transfer of appellant to the above mentioned post is the legal right of the appellant and according to policy and rules regulation the Appellant is entitled to be transferred to the said post.
- v. That on the above mentioned facts and grounds necessary action may kindly be taken against the respondents.

It is humbly prayed that on acceptance of instant departmental appeal, the impugned order mention above may kindly be set aside and the Appellant may kindly be transferred to the said post.

APPELLANT

Siraj Ud Din PET Government High School  
Kanho Tehsil Kabal District Swat.

5

**BEFORE THE CHIEF SECRETARY, GOVERNMENT OF KHYBER**  
**PAKHTUNKHWA PESHAWAR**

Service appeal No \_\_\_\_\_ 2013

Siraj Ud Din PET Government High School Kanju Teshsil Kabal District Swat.

.....(Appellant)

**AFFIDAVIT**

I, Mr. Siraj Ud Din S/o Fazal Mabood R/o Saidu Sharif District Swat,  
do hereby solemnly affirm and state that the contents of the above departmental  
appeal are true and correct to the best of my knowledge and belief and nothing has  
been concealed from this Honourable form, deliberately.

**DEPONENT**



Siraj Ud Din PET Government High School Kanjo  
Teshsil Kabal District Swat.

Date: 28/01/2013

**Attested**  
Abbar Ali Amalkehel  
Advocate  
District Courts Swat  
\* No. 33 (Date 17-1-13)  
Oath Commissioner

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&S) EDUCATION  
DISTRICT SWAT**

**OFFICE ORDER**

Consequent upon the approval of the transfer meeting held on 23/05/2012. The following PET / AT Male teachers are hereby transferred on their own pay and scale to the schools noted against their names from the date of taking over charge in the interest of public service

S.No	Name of teacher	From	To	Remarks
1.	Mr.Irfanullah AT	GMS Gabral	GMS Najigram	A.V. post
2	Mr.Jawad Khan PET	GHS Shawar 1.02.2010	GMS Faiz Abad 24.05.2012	Against N.C.Post
3	Mr.Hanifur Rehman AT	GHS Ahingaro Dherai	GMS Panr 24.05.12	V.S.No.4
4	Mr.Fazal Hakim AT	GMS Panr	GHS Ahingaro Dherai	V.S.No.03
5	Mr.Abdur Raouf AT	GHS Darmai	GMS Azad Banda	A.V.Post

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

*Attested by  
Ataullah Khan advocate*

*Attaullah Khan  
District C  
Swat*

**(SULTAN MEHMOOD MIAN)  
EXECUTIVE DISTRICT OFFICER  
(E&S) EDUCATION SWAT**

Endst. No. 2785-90 / PET/AT(M)

Dated: 24/5/2012

Copy forwarded to the:-

1. The District Accounts Officer swat.
2. The Head Masters concerned.
3. The Budget and Accounts officer local office.
4. The Officials concerned.
5. P.A to local office.

**EXECUTIVE DISTRICT OFFICER  
(E&S) EDUCATION SWAT**

*(Signature)*

*(Signature)*

گوندہ

صاف و شفاف اور ڈینشن افسر صاحبہ کو وقت تمام  
صاف و شفاف اور ڈینشن افسر صاحبہ کو وقت تمام  
صاف و شفاف اور ڈینشن افسر صاحبہ کو وقت تمام

Attested by  
Ataullah Jan  
Advocate

صاف و شفاف اور ڈینشن افسر صاحبہ کو وقت تمام  
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صاف و شفاف اور ڈینشن افسر صاحبہ کو وقت تمام  
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صاف و شفاف اور ڈینشن افسر صاحبہ کو وقت تمام  
صاف و شفاف اور ڈینشن افسر صاحبہ کو وقت تمام

28  
2012

Sirajud Din

PET

GHS Kanju

1st Appt.:- 14.02.97

Near GPO Saidu Sharif

Mr Jawad

P.E.T

GMS Faiz Abad

Add:- Saidu Sharif  
near circuit house  
gulkada Swat

1st appt. : 01.02.2010  
GHS Shanas

permanant Add:-

Kas Korona Sadabad  
mandan

مختصر جواب - 500 ماہ نامہ سے متعلق (مقام) نکلنے والے نامہ سے متعلق

میرانہ ایڈیشن سے PET گورنمنٹ کے حوالے سے سیکول کا جو نامہ آیا ہے اس کے بارے میں

عنوان - درخواستیں اور جوابات کے بارے میں درخواستیں اور جوابات کے بارے میں  
بابت تبادلہ

مذا - عالی اجلاس کے ذریعے  
" یہ سب سے پہلے سے ہی بتایا گیا ہے کہ PET گورنمنٹ کے حوالے سے  
سکول کا جو نامہ آیا ہے اس کے بارے میں

مذا - یہ ہے کہ گورنمنٹ کے حوالے سے سیکول کے بارے میں PET کے حوالے سے  
حال میں سیکول کے حوالے سے سیکول کے حوالے سے سیکول کے حوالے سے  
مذا - یہ ہے کہ گورنمنٹ کے حوالے سے سیکول کے بارے میں PET کے حوالے سے

مذا - یہ ہے کہ گورنمنٹ کے حوالے سے سیکول کے بارے میں PET کے حوالے سے  
مذا - یہ ہے کہ گورنمنٹ کے حوالے سے سیکول کے بارے میں PET کے حوالے سے

گورنمنٹ کے حوالے سے سیکول کے بارے میں PET کے حوالے سے

مذا - یہ ہے کہ گورنمنٹ کے حوالے سے سیکول کے بارے میں PET کے حوالے سے

مذا - یہ ہے کہ گورنمنٹ کے حوالے سے سیکول کے بارے میں PET کے حوالے سے

مذا - یہ ہے کہ گورنمنٹ کے حوالے سے سیکول کے بارے میں PET کے حوالے سے  
28/12/2012

Ataulah Jan

Ataulah Jan  
District Council  
Chitral

میرانہ ایڈیشن سے PET گورنمنٹ کے حوالے سے سیکول کے بارے میں

(1)

(9)

BEFORE THE CHIEF SECRETARY, GOVERNMENT OF  
KHYBER PAKHTUNKHWA PESHAWAR

Departmental appeal No \_\_\_\_\_ 2012

Through proper channel School and literacy department Khyber  
pakhtunkhwa.

Siraj Ud Din PET Government High School Kanju Tehsil Kabal

District Swat. ....(Appellant)

VERSUS

*Attested by*  
*Atallah Jan*

*Atallah Jan*  
*Advocate*  
*District Swat*  
*2012*

1. D.C.O District Swat at Gul Kada Saidu Sharif Swat
  2. E.D.O (E&S) Education District Swat at Gul Kada Swat.
  3. Mr. Jawad PET GMS Faiz Abad Saidu Sharif Swat.
- .....(Respondents)

Departmental appeal against the act of omission to dispose of  
departmental petition filed before D.C.O District Swat dated  
28/5/2012, preferred against the transfer order Endst. No 2785-

90/PET/AJ (M) date 24/5/2012 of E.D.O Swat vide which the legal  
right of Appellant was infringed and one Mr. Jawad was unlawfully;

illegally and on the bases of political approach, transferred to the

vacant post to the Appellant in GMS Faiz Abad Saidu

Sharif Swat.



(2)

10

As the last reminder has been filed before DCO District Swat on date 28/8/2012, therefore instant departmental appeal is within time.

PRAYER:

On acceptance of instant departmental appeal the impugned order mention above may kindly be set aside and the Appellant may kindly be transfer to the said post.

Respectfully Sheweth:

**Brief facts:**

1. That the applicants belongs to Saidu Sharif Swat and joined education department as PET on 14/2/1997 and posted in government High School Ielawnai District Shangla.

2. That after six months of performing sincere duties / services, the applicants was transferred to government High School Annavi District Sliangla.

3. That the Appellant was again transferred to High School Katana Tehsil Khwaza Khela Distric Swat dated 01/5/2000.

Attested by  
Ataul Karim  
District Council  
Swat

(3)

(11)

4. That the Appellant performed his duties with full professional devotion and honesty for 9 year in the said school in thereafter transferred to Government High School Kanjo on date 01/4/2009, where the Appellant is performing his duties till date.
5. That the Appellant has been performing his duties since 1997 at different peripheries and several far flung , hard stations.
6. That due to sincere and punctual duties the Appellant is entitled to be transferred to the nearest vacant post according to the policy.

That recently GPS Faiz Abad Saidu Sharif Swat has been upgraded to GMS Faiz Abad Swat and the position of PET was vacant in the said school to which one Mr. Jawad who was appointed as PET in GHS Shawar District swat on 01/02/2010 (Respondent No 3) was unlawfully, illegally transferred on the bases of political consideration. (Copy of Transfer order annexed herewith as annexure A).

8. That the Appellant filed a petition before the respondent No 1 on date 28/5/2012 against the illegal unlawful order of respondent No 2. (Copy of departmental application is annexed herewith as annexure B).

Attested by  
Ataulah Jan  
District Swat

- 9. That the respondent No 1 sent the same petition to respondent No 2 for necessary action but after laps of limitation of three months the respondent No 1 & 2 are reluctant to dispose of the petition.
- 10. that after the laps of time period of three months for disposing of the appellant filed a reminder before respondent No 1 on date 28/8/2012 but in vain. (Copy of the said reminder is attached herewith as annexure C).
- 11. That the instant departmental appeal has been filed on the following grounds amongst other.

GROUNDS:

*Attested by*  
*Ataulah Jan*  
 Ataulah Jan  
 Advocate  
 District C  
 Cell: 9323-3497593

That the respondent No 1 & 2 are not interested to dispose of instant petition, while the time period for disposing of the said petition is three months which is already been lapsed.

- ii. That the Appellant field a reminder to respondent No. 1 for necessary action dated 28/8/2012 but till now no necessary action has been taken.

(2)

13

iii. That the transferred of respondent No 3 against the vacant post in GMS Faiz Abad Saidu Sharif Swat is illegal, unlawful and against the policy and rules regulation of transfer of education department.

iv. That transfer of appellant to the above mentioned post is the legal right of the appellant and according to policy and rules regulation the Appellant is entitled to be transferred to the said post.

v. That on the above mentioned facts and grounds necessary action may kindly be taken against the respondents.

It is humbly prayed that on acceptance of instant departmental appeal, the impugned order mention above may kindly be set aside and the Appellant may kindly be transferred to the said post.

APPELLANT 

Siraj Ud Din PET Government High School  
Kanjoh Tehsil Kabal District Swat.

Attested by  
Ataulah Jan ✓  
District Jirga  
Call 0346-2000000

محترم جناب چیف سیکرٹری صوبہ سندھ حکومت کو اعلیٰ مقام پر

سرا 12 الین PET گورنمنٹ ہائی سکول کا نئے کلاس روم

میں : درخواست / ریٹائرمنٹ / سہارا / متعلقہ / مندرجہ  
محلہ ایس ایچ 21 9/12 بیت تبادلہ سائل / اپڈیٹ

ضابطہ ذیل عرض ہے

1۔ یہ سائل تحریر شدہ ہے۔ PET گورنمنٹ ہائی سکول کا نئے کلاس روم

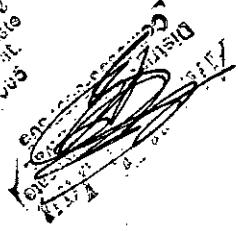
2۔ یہ گورنمنٹ ہائی سکول میں آج سے PET کی آسانی کی ہے۔  
سائل کا تبادلہ ہونا قانونی تھا جسے مجاز حکام نے منظور کیا اور اسے  
PET کا مذکورہ آسانی سے تبادلہ کیا ہے

3۔ مذکورہ تبادلہ کے خلاف سائل / اپڈیٹ کے حضور والا کو  
آپ محلہ ایس ایچ 21 9/12 گورنمنٹ ہائی سکول میں ہے

گورنمنٹ ہائی سکول میں درخواستیں ذیل مندرجہ ہیں

25 12/12 (ایس ایچ 21)

Altaf Ahmad  
Maulana Javed  
District Jirah  
District Commissioner



سرا 12 الین PET گورنمنٹ ہائی سکول

کالی سوا





WAJID ALI KHAN  
MINISTER FOR ENVIRONMENT, FORESTS, FISHERIES AND  
WILDLIFE, KHYBER PAKHTUNKHWA

*Swati*

Dated Peshawar, the 20/5/2010

Dear Babar Saib *Wangora*

*used vacant post in Veluani*  
Mr. Jawad Khan PETSAS  
Bar Shavor is facing great  
hardship in performing *his*  
duty as he belongs *to*

Private Secretary, To  
Minister for Elementary &  
Secondary Education  
Khyber Pakhtunkhwa

It is strongly recommended  
that he may please be  
transferred, *in relaxation of his*  
against the vacant post in  
the public interest. I shall be  
extremely thankful.

Regards

*Yours sincerely*

*20/5/10*  
(WAJID ALI KHAN)  
Minister for Environment  
Govt. of Khyber Pakhtunkhwa

Hon Minister for E/F/S  
2010

خدمت جناب چیرمین صاحب سروس ٹریبیونل کیمپ کورٹ  
(سوائے)

عنوان :- میری سولہ سال سروس میں سیاسی تبدیلاتوں

کالیں منظر

جناب عالی!

میری تقرری بحیثیت معلم تعلیم حسامی ۱۹۹۶-۱۹۹۷-۱۹۹۸

کو گورنمنٹ ہائی سکول لیلوٹی ضلع شانگلہ میں ہوئی تھی

(۱) اچھی مجھے تنخواہ ملی ہی نہیں تھی کہ مجھے ماہ بعد ۱۹۹۷-۱۹۹۸ کو وہاں  
کے MPA صاحب نے میرا تبادلہ گورنمنٹ ہائی سکول آمنوی شانگلہ  
کو کر دی۔ اور یہ مجھ سے اتنا دور تھا کہ گاڑی کے سفر کے علاوہ  
روڈ سے لے کر چار گھنٹے سفر کرنا پڑتا تھا۔

(۲) ایک سال بعد یعنی ۱۹۹۸-۱۹۹۹-۲۰۰۰ کو ایک بار پھر سیاسی اثر رسوخ  
پر میرا تبادلہ وہاں سے گورنمنٹ ہائی سکول چارباغ کر دیا گیا  
وہاں میں نے اچھی سروس کا سانس ہی نہیں لیا تھا۔

(۳) کہ ۲۰۰۰-۲۰۰۱ کو میرے بعد یعنی ۲۰۰۰-۲۰۰۱ کو مجھے وہاں سے  
گورنمنٹ ہائی سکول خوازہ خیلہ آساہ دھکیل دیا گیا  
۲۰۰۰-۲۰۰۱ کو میں نے گورنمنٹ ہائی سکول آساہ خوازہ خیلہ  
میں چارج سنبھالا۔ اور تقریباً (۹) سال وہاں ڈیوٹی  
سنبھالی۔ اور جب (ANP) کی حکومت آئی تو وہاں کے  
MPA صاحب نے EDO کو حکم دیا کہ اس بندے کو وہاں سے  
تبدیل کر دیا جائے۔



کیونکہ یہ سید و شریف کا رہنے والا ہے اور میرے حلقے سے  
ان کا کوئی تعلق نہیں ان کی جگہ میرے بندے کا  
تبادلہ کر دیا جائے۔

(4) چنانچہ EDO مکین خان صاحب نے خصوصی مہربانی کر کے  
میرا پروپوزل مڈل سکول چنگڑی پر تیار کیا۔  
جب مجھے پتہ چلا تو میں مکین خان صاحب کے پاس  
چلا گیا اور ان سے درخواست کی کہ یہ تو سہ اسہ زیادتی ہے  
کہ تو سال کے بعد آپ مجھے مزید دور بھجیے ہیں  
آپ صاحبان نے جواب دیا کہ یہ تو MPA صاحب کا حکم ہے  
اس میں میں کچھ نہیں کر سکتا مجھے جو حکم MPA صاحب  
دے گا۔ میں وہی کروں گا۔

بحر حال اللہ تعالیٰ نے رحم فرما کر تبادلہ منسوخ کر دیا  
لیکن وہاں کے MPA صاحب نے مجھے مزید سہولت نہ  
دی اور وہاں سے میرا تبادلہ گورنمنٹ ہائی سکول  
کا جو کر دیا گیا۔

(5) اور گورنمنٹ ہائی سکول کالجوں میں 2009-2010  
کو میں نے چارج سنبھالیا اور ابھی تک وہاں ڈیوٹی  
سرا انجام دے رہا ہوں۔

العارض  
سیراج الدین  
PEAT  
گورنمنٹ ہائی سکول کالج

جناب وال!

کاجواننا ذور نیس کہ ماہنی کی طرح آب

بھی میں کسی اور MPA کے حلقے میں ڈیوٹی سر انجام

دے دیا ہوں میں اپنے آپ آب بھی محفوظ نہیں سمجھتا

اور مجھے خدشہ ہے کہ یہاں سے بھی کسی وقت میرا تبادلہ  
ہوسکتا ہے۔

الراہے صاحبان خصوصاً میری بالی فرما کر میرا مسئلہ

حل کر دیں تو بندہ تاحیات دعاؤں رہے گا

کیونکہ بندہ ایک عزیز گھرانے سے تعلق رکھتا ہے

اور انصاف کے لیے مزید کورٹ کیچہری کے اخراجات

کی استطاعت نہیں رکھتا۔

نہ تھا کچھ تو خدا حقانہ ہوتا کچھ تو خدا ہوتا

ڈبویا کچھ کو بیونے نے نہ ہوتا میں تو کیا ہوتا

العارض

سراج الدین

PET

گورنمنٹ عالی سکول کراچی

EDO Edu (E & S) Education Distt Swat  
Director  
K.P.R. <sup>۱۲</sup> <sup>۱۱</sup> <sup>۱۰</sup> <sup>۹</sup> <sup>۸</sup> <sup>۷</sup> <sup>۶</sup> <sup>۵</sup> <sup>۴</sup> <sup>۳</sup> <sup>۲</sup> <sup>۱</sup>

اپیل

جناب عالی  
بندہ سپروٹیشنر لف ضلع سوات کا رہنے والا ہے  
اور کچھ بزرگ سال سے محکمہ تعلیم سے وابستہ ہے  
حال ہی میں میں نے اپیل درخواست تیار کیا اور  
اسی ضلع سوات کے افسران سے لی تھی  
حسن کی کہیاں اس اپیل سے منسلک ہیں

جناب عالی  
میرا تبادلہ اس لیے نہیں کیا گیا کہ میرے  
میں نہ تو ایم پی اے کا لٹرٹھقا اور نہ ہی تبادلہ کے لیے  
رقم  
تبادلہ تو ایک طرف اب مجھے دھمکیاں دی جا رہی  
میں کہ صاحبہ صوف مقامی ایم پی اے کا رشتہ دار ہے  
اگر آجے کسی قسم کی درخواست دی تو EDO ضلع  
سوات آجے کہ نہ تو میں کچھ اسطرح کے الفاظ  
توسر کر کے گا کہ آجے کی تو لری چلی جائے گی اور  
آجے کے خلاف مختلف قسم کی انکوائریاں بھی کی جائیں گی  
حسن سے آجے کو تو لری سے درخواست کیا جائے گا

حیاتِ دال

وہیں مسلسل میں میں نکلے سوات کے تمام  
اعضائوں سے خود ملاقات کی اور اپنا مسئلہ بیان کیا  
لیکن کسی نے اس پر توجہ نہ دی۔

پہلے آپ صاحبان سے استدعا ہے کہ آپ اس  
مسئلے میں میرے مدد کریں۔  
کہونکہ اس وقت میں شدید ذہنی استعارے سے گزر  
رہا ہوں۔ آپ سے امید اور انصاف کی توقع  
ہے۔  
اگر سب سے کام یہ مسئلہ حل کریں تو تمنا حیات  
کو دکھائوں رہوں گا

انعام

بیت الدین

پتہ: ای بی بی  
کوئٹہ، ضلع شمالی ستلج، گلگت

تاریخ: 05.07.2012

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

No. 1005 /ST

Dated 09/07 /2013

To,

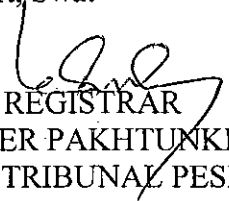
The District Education Officer,  
E&SE, Swat.

Subject:- APPEAL NO. 404/2013 SIRAJ-UD-DIN VS CHIEF SECRETARY AND  
OTHERS.

I am directed to forward herewith the following order dated 01.07.2013  
passed by this Tribunal on the above appeal for strict compliance.

Appellant with counsel and Mr. Abdul Aziz Shaheen, ADO for respondents  
with Mr. Muhammad Zubair, Sr. GP present. Appellant produced certain  
documents showing his frequent transfers in order to adjust people against posts  
vacated due to his transfers on political consideration. The DEO, E&SE, Swat  
(Respondent No. 3) be therefore, summoned in person alongwith record showing  
transfers of the appellant for further preliminary hearing at camp Court Swat on  
12.8.2013.

Sd/--xxx  
Chairman  
Camp Court, Swat

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR.

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

No. 1350 /ST

Dated 25/09 /2013

To,

The DEO,  
E&SE, District Swat at Gul Kada,  
Swat.

Subject:- APPEAL NO. 404/2013 SIRAJ-UD-DIN VS CHIEF SECRETARY AND OTHERS.

I am directed to forward herewith the following order dated 23.9.2013 passed by this Tribunal on the above appeal for strict compliance.

No one is present on behalf of the appellant. Mr. Iqbal Jehan, Headmaster on behalf of respondent No. 3 with AAG for official respondents present. Respondent No. 3 is not present despite direction to that effect in the order sheet dated 01.07.2013. Respondent No. 3 be summoned in person with warning of stern action for further proceedings/further preliminary hearing at camp Court Swat on 04.11.2013.

Sd/---xxx  
Chairman

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR.