17.04 2019

Nemo for appellant. Mr. Muhammad Bilal, DDA alongwith MuhammadTausif, ADO for the respondents present.

н. т. С. т.

On the last date of hearing, last opportunity was granted to the appellant for conclusion/arguments today.

Representative of respondents invited our attention to the transfer order dated 25.07.2017, whereby, the appellant was transferred from GHSS, Baffa to GMS Hafeez Bandi. Alongwith the transfer order copy of application by appellant has also been appended. Through the said application, on 20.03.2018, (during pendency of instant appeal) the appellant had requested the District Education Officer (M) District, Mansehra for his transfer/adjustment from GHSS Baffa to GMS Hafeez Bandi. The representative stated that as the appellant has been adjusted to the place of posting of his choice, he is no more interested in prosecution of instant appeal.

We consider that although in the prayer of instant appeal the appellant has essentially asked for his transfer. from GHSS Baffa to GMS Baffa Kalan District Mansehra, however, in view of subsequent development as stated by the representative of respondents, the appellant is left with no grievance at present. For the said reason the appeal in hand has been adjourned on last so many occasions. It shall, therefore, be just to dispose of the appeal on the ground of having become infructuous in the given circumstances.

Order accordingly. File be consigned to the record

Chairman

Camp Court A/Abad

room Member

Announced: 17.04.2019

18.03.2019

Learned counsel for the appellant and Mr. Muhammad Bilal learned Deputy District Attorney present. Learned counsel for the appellant seeks adjournment. In the present service appeal, pertaining to the year 2016, the appellant has made impugned posting transfer order. Last opportunity is granted. Adjourn. To come up for arguments on 17.04.2019 before D.B at Camp Court A/Abad.

Member

Member

Camp Court A/Abad.

ينون حنات د مرتف المحومية في آفيسر مها (دردانه) جناح مالي م 1 de la U ودبان تزارش بع که میں 2018 - 03 - 03 بال ی برسٹ بر گورنیٹ حائر سکنڈری کول لغ میں اپنے فرائص مرضی مراجار د نے رہا یوں۔ GMS حفیظ با نڈی میں الی الی ٹی تی لوسٹ خالے یونکم میری ریانی مالی می وی سے اور هونط یا ندگی النيرة عزري ٢٠ - اللخ ميريانى مرساكر في تو د ان با بر ساندری کول لو سے کو ران مال Tel ceid vito & als year y taught ゴロレ میں اری عمر آب کے لئے دعا کو رادی سر الم ی نوازش بازی (P) lel ABulla تا قب الله - الس الى ف تورنن ما تر سکن کول لی 20/03/18

## CE OF THE DISTRICT EDUCATION OFFICER (MALE) DISTRICT

Phone # 0997-382271 Fax # 0997-382244 E-mail Address: edoedu\_mansehra@yahoo.com Facebook Page: www.facebook.com/DEOMMANSEHRA

## ADJUSTMENT/TRANSFER

1

Consequent upon the approval of the competent authority E&SE (M) Mansehra, the following SST (G)/ SST(Math/Phy)/ SST(Bio: Chem) are hereby adjusted /transferred against the vacant posts, on their own pay & BPS in the best interest of public service with immediate effect.

| S.#   | Name & Desig:                     | From                            | То                  | Remarks  |
|-------|-----------------------------------|---------------------------------|---------------------|----------|
| 1.    | Muhammad Ajmal Siddique SST       | GMS Sacha Kalan                 | GCMHS Dadar         | A/V Post |
| 2.    | Ikram ul Haq SST                  | GMS Balhag Payeen               | GCMHS N0 3 Mansehra | A/V Post |
| 3.    | Muhib ur Rehman SST               | GMS Paludran (Mandi)<br>Balakot | GHS Attershisha     | A/V Post |
| 4.    | Muhammad Banaris SST              | GHSS Gari Habib Ullah           | GHS Attershisha     | A/V Post |
| 5.    | Shafiq ur Rehman SST              | GHS Madserian                   | GHS Baidra          | A/V Post |
| 6.    | Muhammad Sajid SST(G)             | GHS Rajwal                      | GHS Balakot         | A/V Post |
| 7.    | Sohrab Ayyub SST                  | GHS Kot Gali                    | GHS Balakot         | A/V Post |
| 8.    | Muhammad Ashfaq SST               | GHS Phagal                      | GHS Balakot         | A/V Post |
| 9.    | Abdul Qayyum SST                  | GHSS Kewai                      | GHS Bhangian        | A/V Post |
| 10.   | Sardar Tahir Mehmood SST          | GHS Mangloor                    | GHS Hussainia       | A/V Post |
| 11.   | Muhamad Bashir SST (Sc)           | GHSS Shergarh                   | GHS Khushala        | A/V Post |
| 12.   | Muhammad Fayyaz SST(<br>BIO,CHEM) | GHS Chattar Plain               | GHS Malookra        | A/V Post |
| 13.   | Muhammad Ejaz SST                 | GHS Mohayan                     | GHS No. 2 Mansehra  | A/V Post |
| 14.   | Muhammad Riaz SST                 | GMS Karka                       | GHS No.2 Mansehra   | A/V Post |
| 15.   | S. Attaullah Shah SST             | GMS Noori                       | GHS Paras           | A/V Post |
| 16.   | Abdul Aziz SST                    | GHS Bhangian                    | GHS Sangar          | A/V Post |
| 17.   | Muhammad Ishtiaq SST              | GHSS Perhinna 🗸                 | GHS Trangri Bala    | A/V Post |
| 18.   | Shah Farooq SST                   | GHS Bakki                       | GHSS Baffa          | A/V Post |
| 19.   | Muhammad Ashraf                   | GHS Ahl                         | GHSS Baffa          | A/V Post |
| 20.   | Shah Nawaz SST(Bio, Chem)         | GHS Sum                         | GHSS Dhodial        | A/V Post |
| 21.   | Zia ul Hassan SST                 | GCMHS Dadar                     | GHSS Dhodial        | A/V Post |
| 22.   | Muhammad Ajmal                    | GMS Sunj                        | GHSS No 1 Mansehra  | A/V Post |
| 23.   | Muhammad Siddique SST             | GHSS Phulra                     | GHSS No.1 Mansehra  | A/V Post |
| 24.   | Muhammad Ayyaz SST                | GHS Namabal                     | GHSS No.1 Mansehra  | A/V Post |
| - 25. | Shabbir Ahmad SST (G)             | GHSS L. Thakral                 | GHSS No.1 Mansehra  | A/V Post |
| 26.   | Muhammad Amjad                    | GHS Jaba                        | GHSS No.1 Mansehra  | A/V Post |

| 2<br>28<br>29 | 7 Muhammad Bashir SST (Maths- | GHS Oghi         | GHSS Perhinna                   | A/V Post |
|---------------|-------------------------------|------------------|---------------------------------|----------|
| 28            | . Sajjad Hussain SST          | GHSS Jabori      | GHSS Sherpur                    | A/V Post |
| 29            | . Abdul Qayyum SST            | GHS Shinkiari    | GHSS Sherpur                    | A/V Post |
| 30            | . Muhammad Sahfi SST          | GMS Sat Bani     | GMS Battangi Balakot            | A/V Post |
| 31.           | Saqib Ullah SST               | GHSS Baffa       | GMS Hafeez Bandi                | A/V Post |
| 32.           | Muhammad Rafique SST          | GHS Chattar Plan | GMS Khakhoo                     | A/V Post |
| 33.           | Ali Haider SST                | GMS Kalyan       | GMS Mera Swatiabad              | A/V Post |
| 34.           | Muhammad Tufail SST           | GMS Hangrai      | GMS Narrah                      | A/V Post |
| 35.           | Habib ur Rehman SST           | GHS Matti Kot    | GMS Paludran (Mandi)<br>Balakot | A/V Post |
| 36.           | Muhammad Arshid SST           | GHS Phulra       | GMS Sawan Maira                 | A/V Post |
| 37.           | Muhammad Qadeer SST           | GMS Bandi Kainth | GMS Shahkhail Garhi             | A/V Post |
| 38.           | Khalid Khan SST               | GHSS Gali Badral | GMS Sinjiiyala                  | A/V Post |
| 39.           | Sanawar Khan SST              | GHS Nawazabad    | GMS Tanda                       | A/V Post |
| 40.           | Abdul Razzag SST              | GHSS Phulra      | GMS Thathi Khurd                | A/V Post |

Note: -

1. No TA/DA is allowed.

2. Charge report should be submitted to all concerned.

-Sd/-DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

/2017

Endst: No 11571-77 Estt: (M) Trf:/SST / Dated Mansehra the

Copy to the:-

- 1. The Director E&SE Khyber Pakhtunkhawa Peshawar.
- 2. The Deputy Commissioner Mansehra.
- 3. The District Accounts Officer Mansehra.
- 4. The District Monitoring officer IMU Mansehra.
- 5. Principal/Headmaster School concerned
- 6. B & AO local office.
- 7. Teachers Concerned.
- 8. Office File.
- 9.

DY: DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

Main . Not challage the main order datas 13/3/16 vide 571-13. (1) Apparated as Qari GHS shehad Mazural (i) Ist Sanad from TST cellar Mad samp Und And from Mimar Mandi Peshane (1") change Sanand after completion of process ofter coupletion of precent (a) has no night tern the Based post (16-06-2014) (v) Salay relase (onmette. -> 10-06-2014 \$ 1 2 m co . . . (v)

18.10.2018

Counsel for the appellant present. Mr. Muhammad Tausif, ADO alongwith Mr. Usman Ghani, District Attorney for the respondents present. Learned counsel for the appellant made a request for adjournment. Granted. To come up for arguments on 15.01.2019 before D.B at camp court, Abbottabad.

Membe

## Chairman Camp Court, A/Abad

15.01.2019

Learned counsel for the appellant and Mr. Muhammad Bilal learned Deputy District Attorney present. Adjournment requested. Adjourn. To come up for arguments on 16.01.2019 before D.B at Camp Court Abbottabad.

## Member

Camp Court Abbottabad

## 16.01.2019

Appellant in person and Mr. Muhammad Bilal learned Deputy District Attorney present. Appellant seeks adjournment as his counsel is not in attendance. Adjourn. To come up for arguments on 18.03.2019 before D.B at Camp Court Abbottabad.



Member

Camp Court Abbottabad

23.05.2018

Appellant present: Mr. Usman Ghani learned District Attorney present. Mr. Munawar Hussain Advocate submitted wakalat nama which is placed on file and seeks adjournment. Adjourned. To come up for arguments on 27.06.2018 before the D.B at camp court A/Abad.





27.06.2018

Clerk of counsel for the appellant Mr. Munawar Hussain, advocate present. Mr. Ziaullah, District Attorney for the respondents present. Clerk of counsel for the appellant made a request for adjournment, as learned senior counsel for the appellant is not in attendance. Granted. To come up for arguments on 30.08.2018 before the D.B at camp court, Abbottabad.

Member

Chairman Camp court, A/Abad

30.08.2018

Due to summer vacations, the case is adjourned .To come up for the same on 18.10.2018 at camp court Abbottabad.



**ZO.02.2018** 

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Hamid Mansoor, Junior Clerk for the respondents also present. Written reply not submitted. Learned Additional AG requested for further adjournment. Last opportunity granted. Adjourned. To come up for written reply/comments on 20.02.2018 before S.B at Camp Court Abbottabad.

> (Muhammad Amin Khan Kundi) Member (Judicial) Camp Court Abbottabad

Counsel for the appellant and Addl. AG for the respondents present. In the present appeal, the appellant has made impugned transfer order dated 19.05.2016 whereby the appellant alongwith forty SSTs were transferred/adjusted. Since in the present service appeal, the appellant has challenged transfer order and the same is pending for the last more than one year, hence the present appeal be fixed before the D.B. The respondents to furnish reply/comments till the date fixed. To come up for arguments on 20.3.2018 before the D.B at camp court, Abbottabad.

Member. Camp court, A/Abad.<sup>+</sup>

20.03.2018

None is present on behalf of the appellant. Mr. Usman Ghani, District Attorney alongwith Hamid, Senior Clerk for the respondents present. Departmental representative submitted a copy of the transfer order dated 25.7.2017 and stated that grievance of the appellant has been redressed. To come up for further proceedings on 23.05.2018 before the D.B at camp court, Abbottabad.

Member

ilman-Camp court, A/Abad

1068/16

25.05.2017

Since tour programme to camp court, Abbottabad for the month of May, 2017 has been cancelled by the Worthy Chairman, therefore, case to come up for the same on 22.09.2017 at camp court, Abbottabad. Notices be issued to the parties for the date fixed accordingly



25.09.2017

Since 22<sup>nd</sup> September, 2017 has been declared as public holiday on account of first Muharamul-, Haram, therefore, to come up for the same on 20.12.2017 before S.B at camp court, Abbottabad. Notices be issued to the parties for the date fixed.

## 16.02,2017

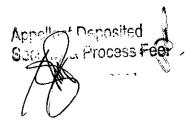
Appellant present in person. Due to strike of the Bar, counsel for the appellant is not in attendance. To come up for preliminary hearing on 16.03.2017 before S.B at camp court, Abbottabad.

**BER** Camp Court, A Abad

16.03.2017

Counsel for the appellant argued that the appellant is serving as SST at GHS Baffa since 5 years. That he was entitled to transfer and posting as SST at GMS Baffa Kalan on the strength of tenure but respondent No. 4 (Masood Khan) was illegally transferred against the said post constraining the appellant to prefer departmental appeal on 17.06.2016 which was not responded and hence the instant service appeal on 13.10.2016.

That the appellant has spent more than 5 years over the present post while the said private respondent No. 4 was given undue favour by transferring him against the said post after serving fore one year and 6 months.



Points urged need consideration. Admit. Subject to deposit of security and process fee, notices be issued to the respondents. To come up for written reply/comments on 19.5.2017 at camp court. Abbottabad.

Camp could, A/Abad

## Form- A

## FORM OF ORDER SHEET

Court of

يكر .

## 1068/2016

|       | Casa                      |   |
|-------|---------------------------|---|
|       | Case N                    | lo1068/2016   |
| S.No. | Date of order proceedings | Order or other proceedings with signature of judge or Magistrate  |
| 1     | 2                         | 3   |
| · 1   | 19/10/2016                | The appeal of Mr. Saqibullah Khan resubmitted   |
|       |                           | today by Mr. Sabir Hussain Advocate may be entered in the   |
|       |                           | Institution Register and put up to the Learned Member for   |
|       |                           | proper order please.  |
|       |                           | In Smethets   |
|       |                           | REGISTRAR   |
| -     | 20/10/16                  | This cost is optrusted to Touris - C. D. J. Market J. C.  |
|       | • (7                      | This case is entrusted to Touring S. Bench at A.Abad for preliminary hearing to be put up there on $22-12-7616$   |
|       | · .                       | premining rearing to be put up there on <u>12-11-16</u> .0  |
|       |                           | $\square$   |
|       | · · · ·                   | MEMBER  |
|       |                           | V   |
|       |                           |   |
|       | 22.12.2016                | None present for appellant present. Notice to   |
|       |                           | counsel for the appellant be issued. To come up for   |
|       |                           | preliminary hearing on 16.2.2017 at camp court,   |
|       |                           | Abbottabad.   |
|       |                           | n in the second s |
| ×     |                           | <b>b</b> .  |
|       |                           | Chairman  |
|       |                           | Camp court, A/Abad  |
|       |                           |   |
|       |                           | · · · · ·   |
|       |                           |   |
| -     |                           |   |
|       |                           |   |
|       | •                         |   |
|       |                           |   |

The appeal of Mr. Saqibullah Khan son of Rafiullah Khan r/ of Baffa City Mohallah Teewal Bala post office Baffa Distt. Mansehra received today i.e. on 13.10.2016 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures of the appeal may be attested.
- 2- Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1711\_\_\_\_/S.T, DI. 14/10 12016

REGISTRAR SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Ē

Mr. Sbair Hussain Adv. High Court Mansehra.

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBNAL PESHAWAR

Service Appeal No. <u>1068</u> of 2016

Mr. Saqibullah Khan

## Appellant

## Versus

## Service Appeal

## INDEX

| Sr.# | Particulars of documents  | Annexure | Pages |
|------|---|----------|-------|
| 01   | Memo of Service appeal along with affidavit   |          | 1-6   |
| 02   | Correct address of the parties  |          | 7-8   |
| 03   | Transfer order Endst. No.6031-38 dated 19-05-2016                                       | A        | 9-10  |
| 04   | Corrigendum order Endst. No 6600-06 Dated 03-06-2016                                    | В        | 11    |
| 05   | Application before Anti Corruption Officer<br>Mansehra Dated: 01-06-2016                | C        | 12    |
| 06   | Departmental appeal dated 17-06-2016  | D        | 13    |
| 07   | Receipt No. 1526 of registry of Post office Baffa<br>District Mansehra Dated 17-06-2016 | E ·      | 14    |
| 08,  | Wakalat Nama  | _        | 15    |

Dated: 10-10-2016

# Bulullah

Mr. Saqibullah Khan

Appellant

spinternen

Sabir Hussain Advocate High Court District Courts Mansehra

0300-5635057

Through

## **BEFORE THE KHYBER PAKHTUNKHWA SERVICE**

TRIBUNAL PESHAWAR Appeal Nº 1068/2016

Mr. Saqibullah Khan S/O Rafiullah Khan, resident of Baffa City, Mohallah Teetwal Bala, Post Office Baffa, Tehsil & District Mansehra.

Appellant

### Versus

- 1) The Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education, Peshawar.
- Director Elementary and Secondary Education Khyber Pakhtunkhwa, Adjacent to G.H.S.S No 01 Peshawar City, G.T Road Peshawar.
- District Education Officer (Male) Elementary and Secondary Education care of District Education (Male) Office near G.H.S.S No. 02, Chitti Dheri, Mansehra, Tehsil & District Mansehra

4) Masood Khan S.S.T presently posted at G.M.S Baffa Kalan, (Baffa City), Post Office Baffa, Tehsil & District Mansehra.

SERVICE APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR THE CANCELLATION OF IMPUGNED ORDERS OF POSTING AND TRANSFER ENDST NO. 6031-38 DATED 19/05/2016 (ONLY UP TO THE EXTENT OF SERIAL NO. 29) AND SUBSEQUENTLY CORRIGENDUM ORDER ENDST NO. 6600-06 DATED 03/06/2016 THROUGH WHICH INSTEAD OF APPELLANT RESPONDENT NO. 4 IS POSTED AT G.M.S BAFFA KALAN WITHOUT ASSIGNING ANY LEGAL AND JUSTIFIABLE REASON ALTOGETHER AND WHOLLY VOID.

**PRAYER:** on acceptance of instant service appeal, the impugned orders Endst no. 6031-38 dated 19/05/2016 Serial No. 29 and Endst No. 6600-06 dated 03/06/2016 may graciously be declared as void-ab-initio, without lawful authority, without jurisdiction and having no legal effect and against the law, rules and policy governing the subject matter and appellant may kindly be transferred from G.H.S.S Baffa to G.M.S Baffa Kalan, Tehsil & District Mansehra or any other relief as may deem fit in the circumstances of the case may also be granted.

#### **Respectfully Shewth:**

- That, appellant is permanent resident of District Mansehra and has been rendering his teaching services for the last 18 years in Education Department at District Mansehra with unblemished service record.
- That, the Respondent No. 3 issued a general transfer & posting order Endst No. 6031-38 dated 19/05/2016 of S.S.T (Male) of District Mansehra upon the approval of competent authority.

(Copy of order Endst No. 6031-38 dated 19/05/2016 is annexed as annexure A).

3. That, before issuing order Endst No. 6031-38 dated 19/05/2016 Respondent No. 3 issued service tenure / list on existing stations of all S.S.T and as per list the appellant is on No. 50 and Respondent No. 4 is on No. 51 and one Shad Muhammad is on serial No. 52. List is in the custody of Respondent No. 3 and appellant may produced subsequently.

- 4. That, the tenure of above mentioned employees before the impugned order Endst No. 6031-38 dated 19/05/2016 is as under;
  - i. Appellant posted at G.H.S.S Baffa on 01/03/2012 service tenure at G.H.S.S Baffa is 4 years and two months.
  - ii. Respondent No. 4 posted at G.M.S Devil Mansehra on 01/11/2014 and service tenure at G.M.S Devil is 18 months.
  - iii. One Shad Muhammad posted at G.M.S Hilkot on 14/07/2015 and his service tenure at G.M.S Hilkot is 9 months.
- 5. That, as per impugned transfer order Serial No. 29 of Endst No. 6031-38 dated 19/05/2016 one Shad Muhammad is transferred from G.M.S Hilkot to G.M.S Baffa Kalan but subsequently issued impugned corrigendum order Endst No. 6600-06 dated 03/06/2016 and Respondent No. 4 is transferred from G.M.S Devil to G.M.S Baffa Kalan instead of Shad Muhammad S.S.T G.M.S Hilkot and reason of issuing of corrigendum best known to Respondent No. 3.

(Copy of Endst No. 6600-06 dated 03/06/2016 is annexed as annexure B).

6. That, after issuing of the impugned order Endst No. 6031-38 dated 19/05/2016 appellant and Respondent No. 4 mutually agreed on the transfer of Appellant at G.M.S Baffa Kalan and respondent No. 4 at G.H.S.S Baffa.

(Copy of application before Anti Corruption Officer District Mansehra K.P.K is annexed as annexure C). 7. That, appellant filed a departmental appeal on 17/06/2016 before the respondent No. 2 being an appellate authority by way of which, the cancellation of impugned order Endst No. 6031-38 dated 19/05/2016 and Endst No. 6600-06 dated 03/06/2016 was sought on various legal and factual ground through registered post which is still unattended.

(Copy of Appeal and Original Receipt No. 1526 dated 17/06/2016 of Post Office Baffa District Mansehra is Annexed as annexure D & E).

 That, the appellant having no alternative remedy except to approach this honourable court by way of instant appeal on the following amongst the other grounds for the cancellation of impugned Serial No.29 order Endst No.6031-38 Dated: 19-05-2016 and Endst No.6600-06 Dated:03-06-2016.

## GROUNDS

- That, the impugned order of transfer of one Shad Mohammad and Subsequently respondent No.4 is Illegal, unlawful, without lawful authority and having no legal effect.
- 2. That, the transfer order of respondent no.4 is against the rules and policy of the department.
- 3. That, due to maximum service tenure of appellant on a single station which is more than four years. It is the right of appellant that he should be transferred instead of respondent No.4.
- 4. That, the respondent No.3 himself acted against his own prepared and issued list of employees and as per list the appellant placed on

serial No.50 while respondent No.4 on serial No.51 on the basis of services tenure on their existing service stations.

- 5. That, the appellant submitted his departmental appeal well written in time on 17-06-2016 which is still not been decided for the reason best known to the appellate authority.
- 6. That, appellant also entitled for the transfer on the post as per seniority.
- That, the appellant and Respondent No.4 mutually agreed on the transfer of appellant at G.M.S Baffa Kalan and respondent No.4 at G.H.S.S Baffa, Tehsil and District Mansehra.
  - It is therefore, most humbly prayed that on acceptance of the instant service appeal, the impugned orders Endst No. 6031-38 (Only serial No.29) dated 19-05-2016 and Endst No. 6600-06 dated 03-06-2016 may graciously be declared as void-ab-anitio, without lawful authority without jurisdiction and having no legal effect and the appellant may kindly be transferred from G.H.S.S\_Baffa, District Mansehra to G.M.S Baffa Kalan, District Mansehra on the basis of list prepared by Respondent No. 03 and on the basis of mutual agreement between the appellant and Respondent 04 or any other relief which the honourable court may deems fit.

Dated: 10-10-2016

Through<sup>,</sup>

Mr. Saqibullah Khar Appellant

Sabir Hussain Advocate High Court District Courts Mansehra

distance

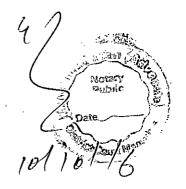
## **AFFIDAVIT**

I, Mr. Saqibullah Khan son of Rafiullah Khan resident of Baffa City, Mohallah Teetwal Bala, Post Office Baffa, Tehsil and District Mansehra (Appellant) do here by solemnly and declare on oath that the contents of the foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this honourable court.

NOa

Dated: 10-10-2016

## Mr. Saqibullah Khan Appellant



## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. \_\_\_\_\_ of 2016

Mr. Saqibullah Khan

### Appellant

#### Versus

### Service Appeal

### **Correct Addresses of the parties**

Mr. Saqibullah Khan S/O Rafiullah Khan, resident of Baffa City, Mohallah Teetwal Bala, Post Office Baffa, Tehsil & District Mansehra.

#### Appellant

#### Versus

- 1) The Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education, Peshawar.
- Director Elementary and Secondary Education Khyber Pakhtunkhwa, Adjacent to G.H.S.S No 01 Peshawar City, G.T Road Peshawar.
- District Education Officer (Male) Elementary and Secondary Education care of District Education (Male) Office near G.H.S.S No.
  O2, Chitti Dheri, Mansehra, Tehsil & District Mansehra

4) Masood Khan S.S.T presently posted at G.M.S Baffa Kalan, (Baffa City), Post Office Baffa, Tehsil & District Mansehra.

Respondents

Dated: 10-10-2016

Through

Mr. Saqibullah Khan Appellant

Sabir Hussain Advocate High Court District Courts Mansehra



## ANNEXURE (A)

## OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

## <u>ORDER</u>

Consequent upon the approval of competent authority, the following SSTs (Male) are hereby transferred / adjusted against the posts mention against each on their own pay and grade in the interest of public service with immediate effect.

| S!/      | Name of SST              | Cultion: |                    | · · · · · · · · · · · · · · · · · · · |             |
|----------|--------------------------|----------|--------------------|---------------------------------------|-------------|
| 1        | Najmul Islam             | Subject  | From School        | To School                             | Remarks     |
| 2        |                          | General  | GMS Chakli Pansial | GCMS Dadar                            | A/V/Post    |
|          | Muliammad Sajjad Hussain | General  | GHS Mohandari      | GHS Attar shisha                      | A/V/Post    |
| 3        | Sajjad Hussoin           | General  | GHS Sangar         | GHS Balakot                           | A/V/Post    |
|          | Saeed Anwar              | Science  | GHSS Kawai         | GHS Batora                            | A/V/Post    |
| 5        | Muhammad Nawaz           | General  | GHS Sangar         | GHS Bhangian                          | A/V/Post    |
| 6        | Kamaran Khan             | General  | GMS Davli          | GHS Bherkund                          | A/V/Posi    |
| 7        | Muhammad Rafique         | General  | GHS Chanar kot     | GHS Chatar Plan                       | A/V/Post    |
| <u> </u> | Fida Hussain Shah        | Science  | GHS Timber Khola   | GHS Gandhian                          | A/V/Post    |
| 9        | Muhammad Afzal           | General  | GMS Pludran        | GHS Josacha                           | A/V/Post    |
| 10       | Nadeem Akhtar            | General  | GHS Bandi Prawo    | GHS Kalwal                            | A/V/Post    |
| _11      | Syed Faroog Hussain Shah | General  | GHS Bat-duga       | GHS Khawari                           | A/V/Post    |
| 12       | Umar Khitab              | Science  | GHSS Jabori        | GHS M.M.Pol                           | A/V/Post    |
| _13      | Junaid Anwar             | Science  | GHSS Kawai         | GHS Milikot                           | A/V/Post    |
| 14       | Munir Ahmad              | Science  | GHS Sangar         | GHS No.2 Manselira                    | A/V/Post    |
| 15       | Arsala                   | General  | GHS Numbal         | GHS Oghi                              | A/V/Post    |
| 16       | Muhammad Arif Khan       | General  | GHS Nawaz Abad     | GHSS Daffa                            | Vice Stl 17 |
| 17       | Sajjad Alam              | General  | GHSS Baffa         | GHS Shinkiari                         | A/V/Post    |
| 18       | Muhammad Sarfaraz        | General  | GMS Dam Nalla      | -GHS Shohal Mazullah                  | A/V/Post    |
| 19       | Muhammad Iliyas          | General  | GHSS Jalgali       | GHSS Balla                            | -}•         |
| 20       | Riaz Hussain             | General  | GLIS Darband       | GHSS Dhodiat                          | A/V/Post    |
| 2.1      | Abdul Aziz               | General  | GHS Darband        |                                       | A/V/Post    |
| 22       | Asif Mehmood Qurashi     | General  | GHS Shahlia        | GHSS Dogah                            | A/V/Post    |
| 23       | Muhammad linran          | General  | GHS Chitta Batta   | GHSS Mansehra // 1                    | A/V/Post    |
|          | Zahid Hussain            | General  | GHS Bai Bohal      | GMS Potha                             | Vice Stl 13 |
| 25       | Muhammad Naseem          | General  |                    | GHS Shahlia                           | Vice SII 22 |
| 26       | Q. Shamsu Din            | ·······  | GHS Sum            | GHSS Mansehra # 1                     | A/V/Post    |
| 2.7      | Muhammad Sadique         | General  | GHS Lassan Nawab   | GHSS Perhinna                         | A/V/Post    |
| 28       | Ghazanfar Ali            | General  | GMS Ghazikot Oghi  | GHSS Phulra                           | A/V/Post    |
| 20       | Ghazamar All             | General  | GMS Khan Shekdora  | GHS Trangri Bala                      | Vice SII 42 |

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| 29 | Shad Muhammad       | General | GMS Hilkot        | GMS Baffa Kalan      | A/V/Post      |
|----|---------------------|---------|-------------------|----------------------|---------------|
| 30 | Imtiaz Ahmad        | General | GMS Chor Banda    | GMS Bedadi           | A/V/Post      |
| 31 | Muhammad Farooq     | General | GMS Nalla Jabar   | GMS Bhogrmang        | A/V/Post      |
| 32 | Khawaj Muhammad     | General | GHS Madserian     | GMS Chanja           | A/V/Post      |
| 33 | S.Mazhar Ali Shah   | General | GHS Bat-doga      | GHS Phulra           | O Dis: Ground |
| 34 | Muhanunad Shuakat   | General | GHS Mohiyan       | GMS Motihal          | A/V/Post      |
| 35 | Hussain Ali Shah    | General | GMS Sinjliala     | GMS More Baffa Kalan | A/V/Post      |
| 36 | Tahir Iqbal         | General | GHSS Phulra       | GMS Ogra             | A/V/Post      |
| 37 | Muhammad Akbar Khan | General | GHS Oghi          | GMS Trawra           | A/V/Post      |
| 38 | Muhammad Farooq     | General | GMS Jabri Choshal | GHS Ghanool          | A/V/Post      |
| 39 | Zeb ur Rehman       | General | GHS Kochati       | GHS Kolika           | A/V/Post      |
| 40 | Wajid Rafique       | Science | GHSS Pairan       | GHS Talhata          | A/V/Post      |
| 41 | Muhammad Iqbal      | General | GHS gandhian      | GMS Baffa Dorah      | A/V/Post      |
| 42 | Abdur Rehman        | General | GHS Trangri Bala  | GHS Gandhian         | vice S# 41    |
| 43 | Sajjad Ahmad        | General | GMS Potha         | GHS Chita Bata       | Vice S#,23    |
| 44 | Q.Rafique Rehman    | General | GHSS Gali Badral  | GHS Mohayian         | Vice SII 34   |
| 45 | Muliammad Saleem    | General | GHSS,Perhina      | GHS,Bherkun          | A.V.P         |
| 46 | Muhammad Ishfaq     | General | GHS,Phagal        | GHS,Balakot          | A.V.P         |
| 47 | Muhammad Ubaid Khan | General | GHS,Chinnarkot    | GHS,Shinkiari        | AVPS          |
| 48 | Muhammad Sadiq      | General | GHS,Nawaz Abad    | GHS,Shikiari         | A.V.P         |

Note:-

1:-

- Charge Report should be submitted to all concerned
- 2:- No TA / DA is allowed

(Nisar Muhammad) DISTRICT EDUCATION OFFICER, (MALE) MANSEHRA

Estt:/Transfer/Adjustment/SST dated Mansehra the <u>}</u> /2016 Endst: No. ⊘

Copy forwarded to the:-

- 1. The Director Elementary & Secondary Education Khyber Pakhtunkhaw Peshawar.
- 2. The Deputy Commissioner Mansehra
- 3. The District Monitoring Officer IMU Mansehra
- 4. The District Accounts Officer Mansehra
- 5. The All the Principals/Headmasters School concerned
- 6. The Teacher concerned.
- 7. B&AO Local office
- 8. Office order file

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DUCATION OFFICER, MÁLEI MANSÉHRA

ANNEURE (B)

#### OFFICE OF THE DISTRIC EDUCATION OFFICER (MALE) MANSEHRA

#### CONRIGENDUM

In continuation of this office order issued under Endst: No. 6031-38 dated 19-05-2016 please read at S No 29 as Mr Masood Khan SST GMS Devel to GMS Baffa Kalan instead of Shan Muhammad SST GMS Hilkot to GMS Baffa Kalon in the interest of public service.

DISTRICT EDUCATION OFFICER (MALE) MANSEHRA 1051 Endst No 66-62 - ON <u>03</u> <u>/(</u> Dated . . .

Copy forwarded to the:- "

- 1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2. Deputy Commissioner Mansehra.
- 3. District Monitoring Officer (IMU) Mansehra.
- 4. District Account Officer Mansehra. 5. Principal/Head Master Concerned.
- 6. The teacher Concerned.
- 7. B & O Local Office.
- 8. Office order file.

ATION AKE) MANSERIA 1

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اي المركز المحمد المحمد المحمد المسلح ما سمره المسمرة المحمد جناب التي كريشن آفيسر صاحب صلح ما سمره . ر عنوان: درخواست برائے فراہم كيئے جانے انصاف ANNEXURE (C)

جناب عالى ! گزارش ہے کہ سائل نمبر امسعود خان SST یوسٹ پر GMS دیول میں 2014-11-01 یے تعینات ہے جو کہ ایک دور در از اور Hard Area ہے۔ اسطرت سائل نمبر 1 Tenurel تقریباً 18 مین بنا ہے۔ اور سائل منبر 2 ثاقب اللہ خان بھی SST پوسٹ پر GHSS بفہ میں 01-03-2012 - تعينات ب- الطرت ساكل نمبر 2 Tenure تقريبا 4 سال اور دومين بنا

A

یہ کہ GMS بغہ کال میں SST کی یوسٹ خالی تھی۔ جس کے لئے دونوں سائلان نے در خواستیں جمع کی تقمیں لیکین دونوں سائلان میں بیہ فیصلہ ہوا تھا کہ سائل نمبر 1 مسعود خان کو GHSS بفہ اور سائل نمبر 2 ثاقب الله كو GMS بفه كلال ميں تعينات كيا جائے گا۔ تاہم SST كے تبادلوں كا جب مورند Endst: No. 6031-38 كو Endst: No. 6031-38 دُسٹركٹ اليجو كيشن آفيسر كے دفتر سے جاری ہوانو دونوں سائلان بیدد کچھ کر جیران ہو گئے کہ ایک سب ہے کم Tenure والاشاد محمد GMS بفہ کلال میں تعینات کیا گیا۔ تحقیقات پر پند چلا تو شاد محمد نے DEO آفس کے عملے کے ساتھ ملکر اپنا Tenure زیادہ کردیا۔شاد محد کا اصلی Tenure 2015 Tenure نے تقریباً صرف 9 مہینے بتا ب- جبكة سأل نمبر 1 Tenure الثماره ماه اور سأنل نمبر 2 Tenure جارسال اوردوماه بنتا ب-اسطرح شاد تحد نے دونوں سائلان کے حفوق پرڈا کہ ڈالا اورا سے کلیر یکل Mistake کا نام دیا گیا۔اسلے آپ جناب سے التجا کی جاتی ہیکہ شادمحد SST اور متعلقہ عملہ کے خلاف تحت قانون کاروائی کی جائے۔

الرتوم 01 جون 2016ء

Tim

، دخان SST Black

ٌ ثاقب الله خان SST

سأئل نمبر1

سائل نمبر 2



13 ANNEXURE (D) بخدمت جناب ڈائر یکٹرصا حب ایلیمنٹر می اینڈ سینڈری ایجو کیشن خیبر پختو نخوا یشاور اپيل عنوان: جناب عالى! ۱)۔ یہ کہ سائل یونین کوسل ہفہ تخصیل وضلع مانسہرہ کا رہائتی ہے۔سائل کا آرڈر بحثیت SST گورنمنٹ ہائر سینڈری سکول ہفہ میں ہوا تھا۔اور سائل اپنی حاضری کر کے اپنے فرائض منصبی سرانجام دےرہاہے۔ ۲)۔ بیر کہ سائل کے علم میں بیر بات آئی کہ SST کے ٹرانسفر آرڈر /ایڈ جسمنٹ ہورہے ہیں جس کی بابت سائل نے GMS بفہ کلال میں این ایڈ جسمنٹ کیلئے اپنی درخواست DEO (M) مانسهره کودی تقی -۳)۔ بید که GMS بفه کلال کیلئے دو اور SST امیدواروں شاد محد اور مسعود خان نے بھی اپن درخواستیں دی تھیں ۔ س)۔ یہ کہ شادمحد کا 2015 Tenure - 14 سے تقریباً صرف دس ماہ ہے۔اور مسعود خان کا Tenure 11-2014 سے ایک سال اور جھ ماہ ہے جبکہ سائل کا Tenure 01-03-2012 - تقريباً جارسال اوردوماه بنات -۵)۔ بیرکہ (DEO (M) مانسہرہ نے مورخہ 2016-19-19 کو GMS بفہ کلال میں شاد محد SST کا آرڈر کیا اور بعد میں 2016-06-03 کو Corrigendum آرڈر کر کے مسعود خان کو GMS بفیہ کلاں میں تعینات کیا۔ ۲)۔ بیر کہ سائل کا Tenure ندکور ہ بالا دونوں امید واروں سے زیادہ ہے اور سائل کا GMS ہفہ کلاں میں ایڈجسٹمنٹ /ٹرانسفر کاحق بنتا ہے ۔لہٰذا آپ سے التماس ہے کہ انصاف کے تقاضوں کو مدنظر رکھتے ہوئے سائل کو اپنی یونین کوسل ہفہ کلاں کے GMS ہفہ کلاں میں ٹرانسفر / ایڈجسٹمنٹ کا موقع فراہم کریں اور بیسائل کا قانونی حق بھی ہے کہا ہے مقامی آبائی سکول میں ایڈ جسٹ اٹرانسفر ہوجائے۔ ارض معلك في اللدخان ولدر فيع اللدخان 1.D

|4 ANNEXURE (E) ). 1526 For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on vb/cc/ por acknowledgement is due. Pś. Rs. ceived res dressed to Officer S. Airfigu rite here inials of Receiving C Insulad for fs. Insurance fears No PS Weight, in Sprds) りん D ť :/ 2 (A) mad D<sub>ata</sub>

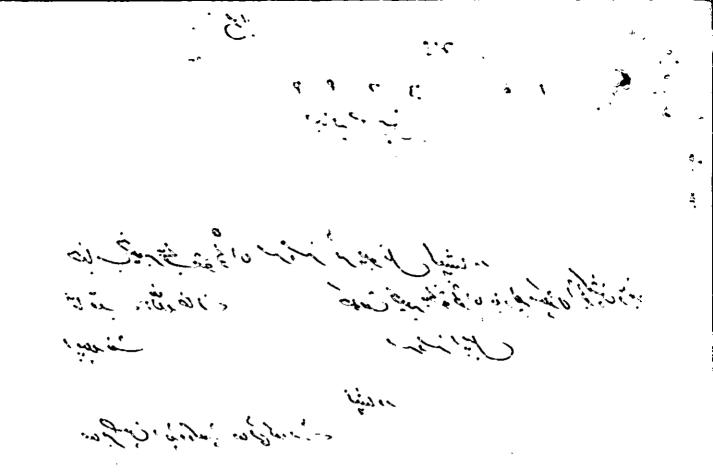
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T. Alansehi

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78 DBM No S.No É)C No. Name of Advocate Sheikh Noor-ul-//min Noor Advocate High Court General Secretary District Bar Ass: Mansehra حارجيبر الح في قراه مردم أريبو الم ليذ الم مد الأرغان \_ بنام: <u>حومت صبر الخونون</u> مدر لم سنون (1 \_ نوعیت مقدمہ: <u>مسرد ' رس</u> ا میں نہ باعث تحريراً نكه دریں مقدمہ عنوان بالامیں اپن طرف سے برائے بیروی دجواب دہی بمقام مسلم بنیم جرم ..... ما مر من الدورك من مى كورك کو بدیں شرائط وکیل مقرر کیا ہے کہ میں ہر پیٹی پرخود یا بذر کیو مختار خاص رو بردعدالت حاضر ہوتا رہوں گا اور بوقت پکارے جانے وکیل موصوف کواطلاع دیکر حاضر کردن گا۔اگر کسی پیشی پر مظہر حاضر نہ ہوا اور غیر حاضری کی دجہ سے کسی طور پر مقد مہ میرے خلاف ہو گیا تو دکیل موجوف اس کے کسی طرح ذمہ دار نہ ہول گے۔ نیز دکیل موجوف صدر مقام کچری کے علادہ کسی اور جگہ کچہری کے مقررہ ادقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ کچہری کے علادہ ، کسی اور جگہ ساعت ہوایا کچہری کے اوقات کے آگے بیچھے ساعت ہونے پر مظہر کو کوئی نقصان پنچے تو دکیل موصوف ذمہ دار نه ہوں کے اور وکمل موصوف کو عرضی دعویٰ اور درخواست اجراء ڈگری دنظر ثانی اپیل نگرائی دائر کرنے نیز ہر قسم کی درخواست بیان حلفی وتصدیق کرنے اور اسپر دستخط کرنے کا بھی اختیار ہوگا۔اور کسی تھم یا ڈگری کے اجراء کرانے اور تسم کا روپ یہ وصول کرنے اور رسید دینے اور داخل کرنے کا ہوتم کا بیان دینے اور سپر د ثالثی وراضی نامہ ود ستبر داری وا قبال دعویٰ کا اختیار بھی ہوگا بصورت اپیل د برآ مدگی مقدمہ یامنسوخی ڈگری بکطرفہ درخواست عظم امتاعی یا فیصلہ کل از ڈگری اجرائے ڈگری بھی دکیل موصوف کر بشرط ادائی کم ملیحد دمحنتانه ادا کرنے کا مجاز ہونگا اور بصورت ضرورت بدوراں مقدمہ یا ایپل دنگرانی کسی دوسرے دکیل یا بیرسٹر کو بجائے خود یا اپنے ہمراہ مقرر کریں ادر مثیر قانونی کو بھی اس امر میں دہی اختیارات حاصل ہوں گے جیسے دکیل موصوف کو ، ۲ اوراگر پوری فیس تاریخ بیش سے پہلےادانہ کروں گا تو وکیل موصوف کو پور ااختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اورالی حالت میں میرا مطالبہ دکیل موصوف کے برخلاف نہیں ہوگا مجھے کل ساختہ پرداختہ دکیل موصوف مثل ذات خود منظور وقبول ہوگا۔ لېذادكالت نامدلكوديا ب اورد يخط الگوها شبت ديا بهتا مسندرب مضمون دكالت نامدين لياب اوراچهي طر شكسيوليا ب 20/6 10 10 AND ACCEPTED تما قت والله خان ولد منبع الله خال مستحم المخط in vie Jen Jeh



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ALSS - SISTER STATE CONTRACTOR STATES

يدين حناب د مثر كف الجو ميشن آ فيسر م ال (دردان) جنال مالير م identes (1) ودیام تزارش بع که میں 2012 ۵۰ - ۵۱ سے الی الی الی فرائص مرحی مرد کام فی یوسف مر گودنی حاکر سکنڈری کول لیز میں اسٹ فرائص مرحی مرد کام دے رہا یکوں۔ ۵۳۶ حفیظ با نڈی میں الی الی ٹی کی لوسٹ خالی المحونكم ميرى رما فتى مالتمرة من ع اور هوز ماندى النبرة تحزريت بع - اللخ ميرماني مرماكر في الورغينا با بر مسلندرى كول لع الله كورغاف مال Jeb Ceiddings ye we ye allo is it being میں اری عمر آب تے لئے دعا کو رادی سر اس تاریخ - 6= 1/1 2018 میں نوازش نول ک Que and the transfer of the get (P) lel Bulla تا قب الله - الم الى ف تورنان ما تر سکنٹری کول لغ

### OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DISTRICT MANSEHRA

**á** )

Phone # 0997-382271 Fax # 0997-382244 E-mail Address: edoedu\_mansehra@yahoo.com Facebook Page: www.facebook.com/DEOMMANSEHRA

## ADJUSTMENT/TRANSFER

Consequent upon the approval of the competent authority E&SE (M) Mansehra, the following SST (G)/ SST(Math/Phy)/ SST(Bio: Chem) are hereby adjusted /transferred against the vacant posts, on their own pay & BPS in the best interest of public service with immediate effect.

| S.# | Name & Desig:                     | From                            | То                  | Remarks  |
|-----|-----------------------------------|---------------------------------|---------------------|----------|
| 1.  | Muhammad Ajmal Siddique SST       | GMS Sacha Kalan                 | GCMHS Dadar         | A/V Post |
| 2.  | Ikram ul Haq SST                  | GMS Balhag Payeen               | GCMHS N0 3 Mansehra | A/V Post |
| 3.  | Muhib ur Rehman SST               | GMS Paludran (Mandi)<br>Balakot | GHS Attershisha     | A/V Post |
| 4.  | Muhammad Banaris SST              | GHSS Gari Habib Ullah           | GHS Attershisha     | A/V Post |
| 5.  | Shafiq ur Rehman SST              | GHS Madserian                   | GHS Baidra          | A/V Post |
| 6.  | Muhammad Sajid SST(G)             | GHS Rajwal                      | GHS Balakot         | A/V Post |
| 7.  | Sohrab Ayyub SST                  | GHS Kot Gali                    | GHS Balakot         | A/V Post |
| 8.  | Muhammad Ashfaq SST               | GHS Phagal                      | GHS Balakot         | A/V Post |
| 9.  | Abdul Qayyum SST                  | GHSS Kewai                      | GHS Bhangian        | A/V Post |
| 10. | Sardar Tahir Mehmood SST          | GHS Mangloor                    | GHS Hussainia       | A/V Post |
| 11. | Muhamad Bashir SST (Sc)           | GHSS Shergarh                   | GHS Khushala        | A/V Post |
| 12. | Muhammad Fayyaz SST(<br>BIO,CHEM) | GHS Chattar Plain               | GHS Malookra        | A/V Post |
| 13. | Muhammad Ejaz SST                 | GHS Mohayan                     | GHS No. 2 Mansehra  | A/V Post |
| 14. | Muhammad Riaz SST                 | GMS Karka                       | GHS No.2 Mansehra   | A/V Post |
| 15. | S. Attaullah Shah SST             | GMS Noori                       | GHS Paras           | A/V Post |
| 16. | Abdul Aziz SST                    | GHS Bhangian                    | GHS Sangar          | A/V Post |
| 17. | Muhammad Ishtiaq SST              | GHSS Perhinna 🗸                 | GHS Trangri Bala    | A/V Post |
| 18. | Shah Farooq SST                   | GHS Bakki                       | GHSS Baffa          | A/V Post |
| 19. | Muhammad Ashraf                   | GHS Ahl                         | GHSS Baffa          | A/V Post |
| 20. | Shah Nawaz SST(Bio, Chem)         | GHS Sum                         | GHSS Dhodial        | A/V Post |
| 21. | Zia ul Hassan SST                 | GCMHS Dadar                     | GHSS Dhodial        | A/V Post |
| 22. | Muhammad Ajmal                    | GMS Sunj                        | GHSS No 1 Mansehra  | A/V Post |
| 23. | Muhammad Siddique SST             | GHSS Phulra                     | GHSS No.1 Mansehra  | A/V Post |
| 24. | Muhammad Ayyaz SST                | GHS Namabal                     | GHSS No.1 Mansehra  | A/V Post |
| 25. | Shabbir Ahmad SST (G)             | GHSS L. Thakral                 | GHSS No.1 Mansehra  | A/V Post |
| 26. | Muhammad Amjad                    | GHS Jaba                        | GHSS No.1 Mansehra  | A/V Post |

| 2   | 7. Muhammad Bashir SST (Maths-<br>Phy) | GHS Oghi         | GHSS Perhinna                   | A/V Post |
|-----|--|------------------|---------------------------------|----------|
| 28  | 8. Sajjad Hussain SST                  | GHSS Jabori      | GHSS Sherpur                    | A/V Post |
| 29  | Abdul Qayyum SST                       | GHS Shinkiari    | GHSS Sherpur                    | A/V Post |
| 30  | ). Muhammad Sahfi SST                  | GMS Sat Bani     | GMS Battangi Balakot            | A/V Post |
| 731 | . Saqib Ullah SST                      | GHSS Baffa       | GMS Hafeez Bandi                | A/V Post |
| 32  | . Muhammad Rafique SST                 | GHS Chattar Plan | GMS Khakhoo                     | A/V Post |
| 33. | Ali Haider SST                         | GMS Kaiyan       | GMS Mera Swatiabad              | A/V Post |
| 34. | Muhammad Tufail SST                    | GMS Hangrai      | GMS Narrah                      | A/V Post |
| 35. | Habib ur Rehman SST                    | GHS Matti Kot    | GMS Paludran (Mandi)<br>Balakot | A/V Post |
| 36. | Muhammad Arshid SST                    | GHS Phuira       | GMS Sawan Maira                 | A/V Post |
| 37. | Muhammad Qadeer SST                    | GMS Bandi Kainth | GMS Shahkhail Garhi             | A/V Post |
| 38. | Khalid Khan SST                        | GHSS Gali Badral | GMS Sinjliyala                  | A/V Post |
| 39. | Sanawar Khan SST                       | GHS Nawazabad    | GMS Tanda                       | A/V Post |
| 40. | Abdul Razzag SST                       | GHSS Phulra      | GMS Thathi Khurd                | A/V Post |

Note: -

1. No TA/DA is allowed.

2. Charge report should be submitted to all concerned.

-Sd/-DISTRICT EDUCATION OFFICER (MALE) MANSEHRA Endst: No 11571-77- Estt: (M) Trf:/SST / Dated Mansehra the /2017

Copy to the:-

- 1. The Director E&SE Khyber Pakhtunkhawa Peshawar.
- 2. The Deputy Commissioner Mansehra.
- 3. The District Accounts Officer Mansehra.
- 4. The District Monitoring officer IMU Mansehra.
- 5. Principal/Headmaster School concerned
- 6. B & AO local office.
- 7. Teachers Concerned.
- 8. Office File.
- 9.

DY: DISTRICT EDUCATION OFFICER

وكالت نام . كور فيس بعدالت مسر مس ، بعن لي لي مر مو عوان: من من اللي بنام مر موسر نوعية مقدمه: مس مسل الما باعث تحريراً نكه مقدمه مندرجه میں اپنی طرف سے واسطے پیر وی و جواب دہی کل کاروائی متعلقہ آں مقام <u>میت کُن ایم معلال ط</u> کودکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موضوف کو مقد مہ کی کل کاروائی کا کامل اختیار ہوگا نیز دکیل صاحب موصوف كوكرنے راضي نامہ وتقرر ثالث و فیصلہ برحلف ودینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصوبی چیک روپیہ دعرضی دعویٰ کی تصدیق اوراس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل پاکسی جزوی کا روائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کوایے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پر داختہ مجھ کومنظور وقبول ہوگا۔ دوران مقدمہ جوخرچہ وہر جاندالتوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایارقم وصول کرنے کا بھی اختیار ہوگا۔اگر کوئی پیشی مقام دورہ پر ہویا حدے باہر ہوتو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کر دہ میں کوئی جز و بقایا ہوتو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے ۔ نیز درخواست بمراد استجارت نانش بصيغه مفلسی کے دائر کرنے اوراس کی پیروی کا بھی صاحب موصوف کواختیار ہوگا۔ لہذاد کالت نامتر مرکردیا تا کہ سندر ہے۔ المرقوم: 23 م) في 23 م بمقام: · نونوسٹیٹ تچہری(ایبٹ آباد)

وكالت نامه كورث قيبر Service Tribunal KPK Pashawar -Sagib allah عنوان: عام عالم م ١٠٠٠ بنام Respondent No 4 نوعيت مقدمه: Service Append . ماعث تحريراً نكر مقدمه مندرجه میں اپنی طرف سے واسطے بیروی و جواب دہی کل کاروائی متعلقہ آس مقام ATO Muhammad Arshad Khan Tanoli Adv Hc کود کیل مقرر کرکے اقر ارکرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کا روائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کوکر نے رامنی نامہ دتقر ر ثالث د فیصلہ بر حلف در بنے اقبال دعویٰ ادر بصورت دیگر ڈگری کرانے اجرا ہ وصولی چیک رو پیہ وعرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا ادر بصورت ضروُرت مقدمہ مذکور کی کل پاکسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کوایے ہمراہ اپنی بجائے تقرر کا اختیار مجمی ہوگا اور صاحب مقرر شدہ کوبھی وہی اور ویسے ہی اختیارات ہوں کے اور اس کا ساختہ پر داختہ مجھ کو منظور و قبول ہوگا۔ د دران مقدمہ جوخر چہ دہر جانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایار قم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہویا جد سے باہر ہوتو وکیل صاحب موصوف یا بند ہوں گے کہ پیردی مقدمہ ندکورہ کریں ادر اگر مختار مقرر کردہ میں کوئی جز و بقایا ہوتو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں کے ۔ نیز درخواست بمرادا ستجارت نائش بھیغہ مغلبی کے دائر کرنے ادر اس کی بردى كالجمى صاحب موصوف كواختيار جوكا -لهذادكالت نامة تح ميكرديا تاكه سندر ي الرقوم: <u>9.5. 0.17</u> Abbittabad بمقام: Accepted Muhammad Arshad khan Tanch' Adu He Abballabao

Service Tribunal KPK Pashawar Cost of the de Scapp a Mak Respondent 120 4 Service Appenl

ATO MULAMIMAN ÀNSKAR FLAGN TANOLI Adv HC

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19.5. 0.17

Accepted

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