

S.No. of proceedings	Date of Order or proceedings.	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	11.01.2016	<p style="text-align: center;"><u>KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR</u> <u>CAMP COURT SWAT</u></p> <p style="text-align: center;"><u>SERVICE APPEAL NO.209/2015</u></p> <p>(Fazal Rehman-vs- Secretary Govt: of Khyber Pakhtunkhwa Education Department and others.)</p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p style="text-align: center;"><u>MUHAMMAD AZIM KHAN AFRIDI, CHAIRMAN:</u></p> <p>Appellant with counsel, Mr. Muhammad Saeed, S.S alongwith Mr. Muhammad Zubair, Senior Government Pleader for official respondents No.1 to 3 and private respondent No.4 in person present.</p> <p>Fazal Rehman hereinafter referred to as the appellant has preferred the instant appeal under section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against order dated 04.10.2014 vide which appellant was transferred from G.H.S Khazana Tehsil Barikot District Swat to G.H.S Qalagay Tehsil Kabal and order dated 01.11.2014 vide which he was again transferred from G.H.S Qalagay to G.H.S.S Kabal.</p> <p>Brief facts of the case of the appellant are that the appellant was appointed as Theology Teacher at GMS Khazana on 20.11.1984 and was serving there till 04.10.2014. That an advertisement dated 08.1.2014 was issued in Daily "Mashriq" wherein the post of appellant was shown vacant and, therefore, private respondent No.4, Ashraf Ali was appointed against the said post through NTS. That the omission came in the notice of respondents No.2 and 3 later or and in order to accommodate private respondent No.4, appellant was transferred from the said school and where</p>

[Handwritten Signature]
11.01.16

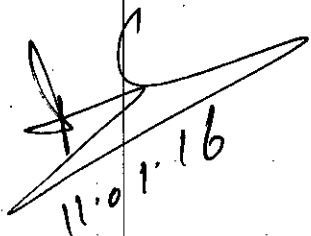
after private respondent No.4 was appointed against the said vacant post. Aggrieved of the said order, appellant has preferred departmental appeal which was not responded and hence the instant service appeal.

We have heard arguments of the learned counsel for the parties and perused the record. Private respondent No.4 Ashraf Ali was also heard in person.

Learned counsel for the appellant argued that the appellant was entitled to serve against the said position as T.T at G.H.S Khazana Tehsil Barikot Shamoza District Swat and that he was transferred vide impugned order with a view to create a vacancy for private respondent No.4, Ashraf Ali who was appointed against the post of T.T in the said school through NTS. That the omission of non-availability of vacancy came in the notice of respondents No.2 and 3 after the appointment of Ashraf Ali, private respondent No.4 and therefore appellant was made a scapegoat. That the appellant is entitled to retain the post as he is senior, aged and ailing.

Learned Senior Govt. Pleader argued that the vacancy was not available for adjustment and appointment in the G.H.S Khazana Tehsil Barikot at the time of adjustment and appointment of private respondent No.4 against the specific post of T.T at the said school. However, after the appointment of private respondent No.4, the respondents No.2 and 3 were obliged to accommodate private respondent No.4 and as such appellant was transferred for creation of vacancy and adjusting private respondent No.4 against the same.

Private respondent No.4, Ashraf Ali was heard in person who informed the Tribunal that he would be having no objection if the appellant is transferred from G.H.S.S Kabal to G.H.S Khazana Tehsil Barikot.


11.01.16

We have examined the stance of the parties and emerging situation and in view of the same we deem it appropriate to hold that the claim of the appellant is justified as his transfer was made only to accommodate private respondent No.4. We, therefore, direct that appellant be retransferred from G.H.S.S Kabal to G.H.S Khazana and private respondent No.4, Ashraf Ali be adjusted against the vacant post at G.H.S Ghalagay if the same is available and in case of non-availability at any other appropriate place. The appeal is accepted in the above terms. No order as to costs. File be consigned to the record room.



(Abdul Latif)
Member




(Muhammad Azim Khan Afridi)
Chairman
11.01.16

ANNOUNCED

11.01.2016

3.8.2015

Appellant in person, Mr. Muhammad Saeed, S.S alongwith Mr. Muhammad Zubair, Sr.G.P for official respondents and private respondent in person present. Written statement by official respondents No.1 to 3 submitted. The appeal is assigned to D.B for rejoinder and final hearing for 3.11.2015 at Camp Court Swat.


Chairman
Camp Court Swat

03.11.2015

Appellant in person and Mr. Muhammad Saeed, S.S alongwith Mr. Muhammad Zubair, Sr.GP for official respondents No. 1 to 3 and private respondent No. 4 in person present. Rejoinder submitted. Arguments could not be heard due to non-availability of D.B. To come up for final hearing before D.B on 11.1.2016 at Camp Court Swat.


Chairman
Camp Court Swat

4. 4.5.2015 Appellant in person, Mr. Muhammad Zubair, Sr. G.P
for official respondents and private respondent No.4
in person present. Written statement submitted by
respondent No.4. None of the representative of other
respondents present. Respondent No.3 be summoned in
person for further proceedings for 01.6.2015 at camp
court Swat.


Chairman
Camp Court Swat

~~Appellant with counsel, Mr. Zulfiqar-ul-Mulk, Deputy DEO
for respondent No.3 alongwith Mr. Anwar-ul-Haq, G.P for official
respondents No.1 to 3 and private respondent No.4 in person present.
Informed the Tribunal that appointment of private respondent No.4
has been made against the specific post at GHS Khazana District Swat
while the services of the appellant are transferable. In view of the
above, respondents No.1 to 3 are directed to submit written statement
on 3.8.2015 before S.B at camp court Swat.~~

5 1.6.2015 Appellant with counsel, Mr. Zulfiqar-ul-Mulk, Deputy DEO
for respondent No.3 alongwith Mr. Anwar-ul-Haq, G.P for official
respondents No.1 to 3 and private respondent No.4 in person present.
Informed the Tribunal that appointment of private respondent No.4
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above, respondents No.1 to 3 are directed to submit written statement
on 3.8.2015 before S.B at camp court Swat.

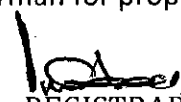
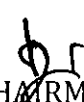


Chairman
Camp Court Swat

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 209/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	12.03.2015	<p>The appeal of Mr. Fazal Rehman resubmitted today by Mr. Tariq Aziz Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to Touring Bench Swat for preliminary hearing to be put up thereon <u>07-4-15</u></p> <p style="text-align: right;"> CHAIRMAN</p>
3	7.4.2015	<p>Counsel for the appellant present. Learned counsel for the appellant argued that the appellant is aggrieved of the transfer order of respondent No.3 dated 4.10.2014 on the basis of which he was transferred from GHS Khazana Bariket to GHS Qalagay Tehsil Kabal after a period of 28/29 years service. Learned counsel for the appellant is pleading old age and non-availability of vacancy at the time of advertisement. Pre-admission notice be issued to the respondents for 4.5.2015 at camp court Swat.</p> <p style="text-align: right;"> Chairman Camp Court Swat</p>

The appeal of Mr. Fazal Rehman son of Sawal Faqir r/o Mingora Tehsil Barikot Distt. Swat received to-day i.e. on 23.01.2015 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 1- Copy of departmental appeal against the impugned order 27.10.2014 and 1.11.2014 is not attached with the appeal which may be placed on it.
- ✓ 2- Affidavit may be got attested by the Oath Commissioner.

No. 80 /S.T,

Dt. 23/01 /2015


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Tariq Aziz Adv. High Court Swat.

As main order i.e 04/10/2014 has already been impugned before. Departmental Authority & its departmental appeal is annexed herewith as annexure "E" page 26, moreover other impugned orders are its continuation. Resubmitted after removing objection NO 2

Tariq Aziz Advocate
12/03/2015

BEFORE THE HON,BLE SEARVICE TRIBUNAL
KHYBER PAKHTUNKHWA,CAMP COURT AT
GULKADA,SAIDU SHARIF SWAT.

Service Appeal NO-~~A~~²⁰⁹---Of 2015

Fazal Rehman-----Appellant

Versus

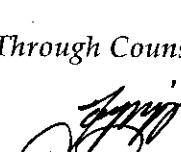
Secretary Govt of K.P.K and others-----Respondents

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S. No	Description	Annexure	Pages No
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8.	Copy of advertisement dated 08-01-14 & list of Vacancies provided by Respondent No3	C	22-24
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10.	Copy of departmental Appeal dated 11-10-2014 with better Copy	E	26,26A
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Petitioner

Through Counsels


TARIQ AZIZ Advocate(H.C)
& Shakirullah Advocate

Office: Azeem khan plaza 2nd floor room no C.9
makanbagh mingora District Swat.
Cell #: 03469693740,.

BEFORE THE SERVICE TRIBUNAL KHYBER-PAKHTUN-KHWA PESHAWAR, CAMP COURT AT GULKADA DISTRICT SWAT.

Service Appeal No 209 of 2015

Stamp: 23-1-2015
Handwritten: 62

Fazal Rehman S/O Sawal Faqir resident of Mingora presently at Gari P.O Zarakhela, Shamozai Tehsil Barikot District Swat(Appellant)

Versus

- (1) Secretary Government of Khyber Pakhtoon Khwa, Education Department at Peshawar.
- (2) Director Education, Khyber Pakhtoon khwa at Peshawar.
- (3) District Education Officer (Male) Swat at Saidu Sharif Swat.
- (4) Ashraf Ali S/O Ahmad khan resident of Ghalegay Tehsil Barikot District swat, (G.H.S Khazana District Swat).(Respondents).

Appeal under Section 4 of Service Tribunal Act 1974 against the impugned Orders of respondent No 3 through the impugned office Orders Endst: no 1709-29/TT dated 04-10-2014 whereby Appellant has been transferred from G.H.S Khazana (Tehsil Barikot, Shamozai District Swat) to G.H.S Qalagay (Tehsil Kabal District Swat) and that of Endst: No 3718-25 dated 27-10-2014 vide which the respondent no 4 has been appointed/ posted at G.H.S Khazana Dist Swat & Corrigendum Endst: No 4948-55 dated 01-11-2014 vide which the appellant was once again transferred from G.H.S Qalagay to G.H.S.S Kabal.

Stamp: 23/1/15
Handwritten: 23/1/15

Prayer: On acceptance of this appeal the impugned Orders Endst: No 1709-29/TT dated 04-10-2014 and that of Endst: No ~~3718-25~~ dated ~~27-10~~-2014 & Corrigendum Endst: No 4948-55 dated 01-11-2014 passed by Respondent No 3, be deciare illegal, unconstitutional, against the

re-submitted to day and filed.
Signature
Registered
12/3/15

Services Laws, rules and regulations therefore be set aside and the ~~Appellant~~ may kindly be allowed to retain his service/ Position as T.T (B.P.S=15) in the G.H.S Khazana (Tehsil Barikot, Shamoza District Swat) with all its existing perks and privileges.

Respectfully Sheweth, The Appellant Submits as under;

- (1) That the Appellant was initially appointed as Theology Teacher (TT=Post, BPS=07) at Government Middle School Khazana dated 20-11-1984 (Tehsil Barikot Shamzoai Swat). Copy of Service book is attached as annexure....."A"
- (2) That the Appellant served his duty in the said School since the date of appointment till the impugned order dated 4.10 2014 & the appellant permanently resided in shamoza.
- (3) That the Appellant is a senior teacher, and physically weak, aged person and suffered in various diseases. Copies of medical treatment of Appellant are attached as annexure....."B"
- (4) That advertisement dated 08.01.2014 was issued in Daily "Mashriq", in that advertisement and in the list of vacancies of respondent No 3, the post of petitioner was shown vacant. It was also mentioned therein that new selected teachers through N.T.S will have to be appointed/ placed against vacant post but in fact, at that time there was no vacant post of TT at G.H.S Khazana because the appellant was already serving on the said post. Copy of Advertisement dated 08.01.2014 and list of vacancies of respondent No 3 are attached as annexure....."C"
- (5) That on 04-10-2014 the respondent NO 3 issued the impugned Transfer Order through Office Order Endst: No 1709-29/TT dated 04-10-2014 whereby the ~~Appellant~~ has been transferred from G.H.S Khazana (Tehsil Barikot, Shamoza District Swat) to G.H.S Qalagay (Tehsil Kabal Swat). Copy of

Office Order Endst: No 1709-29/TT dated 04-10-2014 is attached as annexure....."D".

- (6) That the Appellant bonafidely filed departmental appeal/application No 669 dated 11-10-2014 against the said impugned office order dated 04-10-2014 which has not been disposed off till to date. Copy of departmental appeal/ application no 669 dated 11-10-2014 is attached as annexure..... "E".
- (7) That later on the respondent No 4 was illegally appointed in G.H.S Khazana District Swat vide Impugned Office Order Endst; No 3718-25/TT/Appointment/Adhoc/NTS dated 27-10-2014 passed by respondent No 3. Copy of impugned Office Order Endst; No 3718-25/TT/Appointment/Adhoc/NTS dated 27-10-2014 passed by respondent No 3 is attached as annexure..... "F".
- (8) That once again, the Appellant was transferred from GHS Qalagay to GHSS Kabal by respondent No 3 vide Corrigendum Endst: No 4948-55 dated 01-11-2014. Copy of Corrigendum Endst: No 4948-55 dated 01-11-2014..... "G".
- (9) That along with so many reasons the impugned Transfer/ appointment Orders Endst: No 1709-29/TT dated 04-10-2014 and that of Endst: No ~~3718-25~~ dated ~~27-10~~ 2014 & Corrigendum Endst: No 4948-55 dated 01-11-2014 passed by Respondent No 3 are illegal, unconstitutional, against the services rules regulations, public interest and liable to be set-aside inter alia on the following grounds.

GROUND:

- (i) That the impugned Orders Endst: No 1709-29/TT dated 04-10-2014 and that of Endst: No ~~3718-25~~ dated ~~27-10~~ 2014 & Corrigendum Endst: No 4948-55 dated 01-11-2014 are illegal, unconstitutional, against the principle of natural justice, against the

public interests, services Laws and Regulations, hence not tenable.


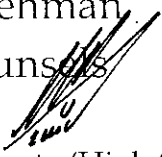
- (ii) That there was no vacant post in this school (GHS Khazana), while announcing N.T.S posts/ vacancies in advertisement dated 08-01-2014 in Daily Mashriq stated above and in the list of respondent No 3, it has been shown vacant. It is settled principle of law that no one should be penalized by the act of Authority.
- (iii) That, the appellant is an ill and aged person, and vide impugned Orders the appellant has been transferred to a far flung area (long distance) from his locality without any reason which is not sustainable in the eye of Law.
- (iv) That while issuing the impugned Orders Rationalization Policy and Rules Regulations have been violated.
- (v) That no prior notice of impugned transfer Orders has been given to the appellant as well, therefore his transfer is not based on privileged Law, equity and natural justice.
- (vi) That the impugned Order is favorable to respondent No 4 and some other persons on the Cost of appellant.
- (vii) That till date there exist no adverse remarks against the Appellant and the Appellant kept unblemished record in the entire Service career.
- (viii) That it is in the interest of justice to adjust any other teacher in G.H.S Qalagay/ Kabal (holding the same position) and the Appellant may kindly be retained to serve in G.H.S Khazana (Tehsil barikot, Shamoza Swat).

It is therefore kindly requested that On acceptance of this appeal the impugned transfer Office Orders and corrigendum of Respondent No 3 may kindly be declare illegal, unconstitutional, against the public interest services rules and regulations be set-aside and the Appellant may kindly be allowed to retain his service/ Position as T.T, (BPS=15) in the G.H.S Khazana (Tehsil Barikot, Shamoza District Swat) with all its existing perks and privileges.

Appellant


Fazal Rehman

Through Counsels

 
Tariq Aziz Advocate (High Court)

Mobile No =03469693740

Shakirullah Advocate

Mobile No=03139663763

Office; Azeem khan plaza, room no c-9,
2nd floor, mingora, swat.

CERTIFICATE

It is certified that no such like other appeal of the same subject matter has earlier been instituted by the appellant and this is the first ever appeal against the impugned office orders as per information provided by the appellant to us.


Fazal Rehman

Through counsels

 
Tariq Aziz Advocate (High Court)

Shakirullah Advocate

(6)

Before the Service Tribunal Khyber Pakhtoon
Khwa, Peshawar, Camp Court at Gulkada, Swat.

Service Appeal No _____ of 2015

Fazal Rehman S/O Sawal Faqir R/O Mingora presently
at Gari P.O Zarakhela, Shamoza Tehsil Barikot District
Swat.....(Appellant)

Versus

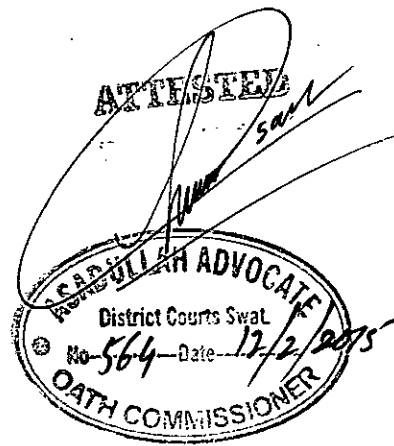
Secretary Government of K.P.K and others ..(Respondents)

AFFIDAVIT

It is solemnly affirm and declare on oath that
contents of the above titled appeal are true and correct
to the best of my knowledge and belief and nothing has
been kept concealed from this Honorable Tribunal.

Deponent

Fazal Rehman



**Before the Service Tribunal Khyber Pakhtoon
Khwa, Peshawar, Camp Court at Gulkada, Swat.**

Service Appeal No _____ of 2015

Fazal Rehman S/O Sawal Faqir R/O Mingora presently at
Gari P.O Zarakhela, Shamoza Tehsil Barikot District
Swat.....(Appellant)

Versus

Secretary Government of K.P.K and others.. (Respondents)

MEMO OF ADDRESSES

Addresses of Appellant:

Fazal Rehman S/O Sawal Faqir R/O Mingora
presently at Gari P.O Zarakhela, Shamoza Tehsil
Barikot District Swat.

CNIC No = 15602-0411517-3

Mobile No = 03139769966

Addresses of Respondents:


- (1) Secretary Government of Khyber Pakhtoon Khwa,
Education Department at Peshawar.
- (2) Director Education, Khyber Pakhtoon khwa at
Peshawar.
- (3) District Education Officer (Male) Swat at Saidu Sharif
Swat.
- (4) Ashraf Ali S/O Ahmad Khan resident of Ghalegay Tehsil
Barikot (G.H.S Khazana) District Swat.

Appellant




Fazal Rehman

Through Counsels


Fariq Aziz Advocate (High Court)

Mobile No =03469693740


Shakirullah Advocate

**Before the Service Tribunal Khyber Pakhtoon
Khwa, Peshawar, Camp Court at Gulkada, Swat.**

Service Appeal No _____ of 2015

Fazal Rehman S/O Sawal Faqir R/O Mingora presently
at Gari P.O Zarakhela, Shamoza Tehsil Barikot District
Swat.....(Appellant)

Versus

Secretary Government of K.P.K and others..(Respondents)

**Application for suspension of operation of
impugned Orders through Office Orders
Endst: No 1709-29/TT dated 04-10-2014 and that
of Endst: No ~~3718-23~~ dated ~~27-10~~ 2014 &
Corrigendum Endst: No 4948-55 dated 01-11-
2014 till the disposal of above mentioned
Appeal.**

Respectfully Sheweth,

- (1) That the appellant has filed above titled Appeal in this Honorable Tribunal in which no date for presentation has yet been fixed.
- (2) That the Applicant/ Appellant is aggrieved from the impugned Orders which are not on the basis of privileged Law and justice and their exist a good prima facie case in favour of Applicant and he is sanguine about its success.
- (3) That balance of convenience also lies in favour of Applicant.
- (4) That grounds of appeal be considered as grounds for this application.
- (5) That if the impugned Orders have not been suspended and proceeded further, the petitioner will have to suffer irreparable loss and resultantly the object of titled appeal to be anfractuious.

It is therefore humbly prayed that on acceptance of this application the impugned Orders mentioned above may kindly be suspended till the disposal of this appeal.

Applicant/Appellant

فزال رحمان

Fazal Rehman

Through Counsels

فاتیق عزیز

Fatiq Aziz Advocate (High Court)

Mobile No =03469693740

Shakirullah Advocate

(10)

Annexure "A"

Copy of Service Book

FAZAL RAHMAN (T.T)

G. H. S. Khazana Swat.

(For use in Police Department only).
 Book Services

Heirs, **FARAZ RAHMAN (T.T.)**

- 1.
- 2.

Verification Roll No. **2** dated **24/10/15** received back

Left thumb-impression.

F.C.
 24/10/15

Qualification	Date	Qualifications	Date
English		First Arts	
Pashtu		B. L. or B. A.	
Urdu		Pleadership examination	
Plan-drawing		Training School Final examination	
Finger print		Other qualifications—	
Drill instructing		<i>2. Negari</i> <i>پولیس</i> Passed the Daril-Ulume.	
Court duties		Islamia Saidh-Sharif (SWAT) Under Roll No. 14	
Reserve duties		<i>Sanjida</i> <i>پولیس</i>	

N. B.—Aine to be drawn under the qualification possessed.

(11)

EEF No: 55958

S. No: 40

3.

Note:—The entries in this page should be renewed or re-attested at least every five years and the signature to lines 9 and 10 should be dated.

1. Name FAZAL- RAHMAN

2. Race Mula-Khet

3. Residence MINGORA (SWAT)

T.C
21/01/2015

4. Father's name and residence SAWAL- FADIR (MINGORA)

5. Date of birth by Christian era as nearly as can be ascertained 21. 11 1959

Twenty 1st November N.H. Area Mingora

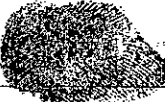
6. Exact height by measurement 5-feet 8-inches


7. Personal marks for identification.. Black Mark on nose


8. Left hand thumb and finger impression of (non-gazetted) officer

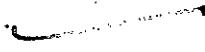
Little Finger 

Ring Finger 

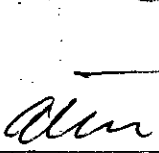
Middle Finger 

Fore Finger 

Thumb 

9. Signature of Government servant 

10. Signature and designation of the Head of the Office, or other Attesting Officer.


Sub Offr. Reception Officer
15/1/55

Head of Office,
Govt High School,
Mingora, District: SWAT

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant
BPS No. 7 (560-23-1020) O. Order No. 28466 68/A-14 Dt. 19-11-84							
M. J. Jyoti Teacher Govt. Middle School, Khasama (SWAR)			560/- Rs			20-11-84 12 185	م. ج. جوتي
do			583	✓		12 186	م. ج. جوتي
do			606/-	✓		12 187	م. ج. جوتي
do			Rs 812	✓		12 188	م. ج. جوتي
do			Rs 813	✓		12 189	م. ج. جوتي
do			Rs 874/-	✓		12 190	م. ج. جوتي
do			874/-	✓		1-10-89	م. ج. جوتي
do			905/-	✓		1-12-89	م. ج. جوتي
do			936/-	✓		1-12-90	م. ج. جوتي
BPS. NO-7 (1095-60-1995)							
do			1455/-	✓		1-6-91	م. ج. جوتي
do			1515/-	✓		1-12-91	م. ج. جوتي
Do	Do		Rs 1575/P.M	✓		1-12-92	م. ج. جوتي
Do	Do		Rs 1635/P.M	✓		12 193	م. ج. جوتي

T.C
21/01/2015

RBPS-7 = 750-31-1370

T.T
Khasama

T.C
 21/01/2015

9	10	11	12	13		14	15
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
S: D: E: O: Saidu Sharif	30 11/85	Annual increment	S: D: E: O: Saidu Sharif	Leave	Government	Signature of the head of the office or other attesting officer Reference to any recorded punishment, or censure, or reward or praise of the Government Servant.	
S: D: E: O: Saidu Sharif	30 11/86	Annual increment	S: D: E: O: Saidu Sharif	Leave	Government		
S: D: E: O: Saidu Sharif	30 6/87	Scale revised	S: D: E: O: Saidu Sharif	Leave	Government		
S: D: E: O: Saidu Sharif	30 11/87	Annual increment	S: D: E: O: Saidu Sharif	Leave	Government		
S: D: E: O: Saidu Sharif	30 11/88	Ann. incr.	S: D: E: O: Saidu Sharif	Leave	Government		
S: D: E: O: Saidu Sharif	30 9/89	Shifted to G.H.S.	S: D: E: O: Saidu Sharif	Leave	Government		
S: D: E: O: Saidu Sharif	30 11/89	A. 2.	S: D: E: O: Saidu Sharif	Leave	Government		
Head master, Govt: High School, Khazana Swat.	30 11/90	A. 4.	Head master, Govt: High School, Khazana Swat.	Leave	Government		
Head master, Govt: High School, Khazana Swat.	31 5/91	pay fixed in revised pay scale 1991	Head master, Govt: High School, Khazana Swat.	Leave	Government		
Head master, Govt: High School, Khazana Swat.	30 11/91	A. 10	Head master, Govt: High School, Khazana Swat.	Leave	Government		
Head master, Govt: High School, Khazana Swat.	30 11/92	Promoted increment	Head master, Govt: High School, Khazana Swat.	Leave	Government		
Head master, Govt: High School, Khazana Swat.	30 11/93	Annual increment	Head master, Govt: High School, Khazana Swat.	Leave	Government		
Head master, Govt: High School, Khazana Swat.	31 5/94	Scale revised 1994	Head master, Govt: High School, Khazana Swat.	Leave	Government		

Appointed against Theology teacher at S.M.S. Khazana Dera Swat vide DEO, Swat, Saidu Sharif. Entry No. 28466-68/A-14/T.T dated 19-11-1989

Sub Divisional Education Officer, Swat, (Rohat/Baloch)

Pay fixed in R.B.P.S = No 7
 pay on 30 6/87 in B.P.S 7 - Rs. 606/-
 Total No of increments taken - 2
 pay fixed in R.B.P.S No 7 on 12/87 - Rs. 812/-
 with next increments on 12/87 - Rs. 843/-

Sub Divisional Edu: Officer, Saidu Sharif, Sub Divisional

Service Verified w.e.f. 19.11.1987
 30.11.87 in acc: Rolls & other Record of this Office.

Sub Divisional Edu: Officer, Saidu Sharif, Sub Divisional

Service Verified w.e.f. 1.12.87 to 30.9.89 from acc: Rolls & other Record of this Office.

Sub Divisional Edu: Officer, Saidu Sharif, Sub Divisional

Sub Divisional Edu: Officer, Saidu Sharif, Sub Divisional

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature of Government servant
T.C. 21/5	1982						
Office of the P.O. of No. 750-31-1370 of No. 812/ With next		Pay Scale of No. 13-113 1-18-1982	8191				
	2	3078					
		Pay Scale of No. 1095-60-1595 of No. 1455/ With next					
		Pay Scale of No. 1095-60-1595 of No. 1455/ With next					
T.T. S. S. Khazana	Sweet Sub	BFS, No - 7 (1840-81-2695)	Rs. 2209/- p.m		1 6/94		
		Office of the N.W.F.P. Peshawar. Pay fixed of Rs. 1800-212655 2, Rs. 2209/- With next					
		Accounts Officer. Pay Fixation Party N.W.F.P. Peshawar.					

Signature of Government servant

1
2
3
4
5
6
7
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H
C
K

T.C
 21 1/15

9	10	11	12	13	14	15
				Leave		
				Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
				Government to which debitable		
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8				Nature and duration of leave taken		Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
Date of termination of appointment				Signature of the head of the office or other attesting officer		
Reason of termination (such as promotion, transfer, dismissal, etc.)				Signature of the head of the office or other attesting officer		
Signature of the head of the office or other attesting officer				Signature of the head of the office or other attesting officer		
<p>Departmental Pay fixation in Revised Pay Scale No. 7 w.e.f. 1-6-94 via Finance Deptt. Notification No. (G)-1194 Dated Fresh the 19-1-94</p> <p>Existing Basic Pay on 1-5-94 Rs. 1625/- increase @ 13500% on Basic Pay Rs. 574/25 Total Rs. 2209 1/25</p> <p>Equal/Next Stage in Revised Pay Scale Rs. 2209/-</p> <p>Pay fixation on 1-6-94</p> <p>Date of appointment 1-6-94</p> <p>UNDER-TAKING</p> <p>Head master, Govt. High School, Khazana, Distt. Swat.</p>				<p>(3) Service Verified w.e.f. 1-10-89 to 30-11-89 from acq. Roll & other Record of this Office.</p> <p>Head master, Govt. High School, Khazana, Distt. Swat.</p>		
<p>Head master, Govt. High School, Khazana, Distt. Swat.</p> <p>30 11/94 Annual increment</p> <p>Head master, Govt. High School, Khazana Swat.</p> <p>UNDER-TAKING</p> <p>Mr. 3341 Rahman TT GHS Khaza Swat</p> <p>By give an under taking the effect of the pay over Payment is made in the revised pay fixation on 1-6-94</p> <p>Pay/Pen</p> <p>Attest</p> <p>Sign: of Govt. Servant.</p>				<p>(4) Service Verified w.e.f. 1-12-89 to 30-11-90 from acq. Roll & other Record of this Office.</p> <p>Head master, Govt. High School, KHAZANA, Distt. Swat.</p>		
<p>Head master, Govt. High School, Khazana Swat.</p> <p>pay in Bps no 7 31 5/91 Rs. 936/-</p> <p>pay fixed in Modified Rs. 961/-</p> <p>pay fixed in Revised pay scale no 7 on 1 6/91 Rs. 1455/-</p>				<p>(5) Service Verified w.e.f. 1-12-90 to 31-5-91 from acq. Roll & other Record of this Office.</p> <p>Head master, Govt. High School, KHAZANA, Distt. Swat.</p>		
<p>Head master, Govt. High School, Khazana Swat.</p> <p>Head master, Govt. High School, Khazana Swat.</p> <p>Head master, Govt. High School, Khazana Swat.</p>				<p>(6) Service Verified w.e.f. 1-6-91 to 30-11-91 from acq. Roll & other Record of this Office.</p> <p>Head master, Govt. High School, Khazana, Distt. Swat.</p>		
<p>Head master, Govt. High School, Khazana Swat.</p> <p>Head master, Govt. High School, Khazana Swat.</p>				<p>(7) Service Verified w.e.f. 1-12-91 to 30-11-92 from acq. Roll & other Record of this Office.</p> <p>Head master, Govt. High School, Khazana, Distt. Swat.</p>		

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating - state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant

BPS, NO-7 (1480-81-2695)

T.T.
S.H.S. Khayana Swat

Subs -
Tem

Rs, 2290/- P.m.

12/94

مبارک

- do -

- do -

Rs, 2371/- P.m.

12/95

مبارک

T.C.
2/10/96

- do -

- do -

Rs, 2452/- P.m.

12/96

مبارک

- do -

- do -

Rs, 2533/- P.m.

12/97

مبارک

- do -

- do -

Rs, 2614/- P.m.

12/98

مبارک

- do -

- do -

Rs, 2695/- P.m.

12/99

مبارک

- do -

- do -

BPS-8 (1540-88-2860)

12/2000

مبارک

- do -

- do -

Rs, 2772/- P.m.

12/2000

مبارک

BPS-7 (2220-120-5820)

- do -

- do -

Rs, 4380/- P.m.

12/2001

مبارک

Office of the Accounts Officer
N.W.F.P. Swat
pay placed in the revised basic pay scales 24
of Rs 2220-120-5820 B-7
of Rs 4380/- P.M. 1-12-01
with next increment on 1-12-01
Accounts Officer
Non Fixation Party N.W.F.P., Swat

Signature of Government servant

Head of Govt. Khan

Signature

Signature

Signature

Signature

Signature

Signature

Signature

Signature

Signature

Signature

Signature

Signature

Signature

Signature

T.C
21/15

Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8.	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
				Period	Government to which debitable		
<i>M. J. Khan</i> Head master, Govt. High School, Khazana Swat.	30/11/95	Annual increment	<i>Saeed Ahmad</i> Head master, Govt. High School, Khazana Swat.				<p>Service Verified w.e.f 1-12-92 to 30-11-93 from acq. Roll & other Record of this Office.</p> <p><i>M. J. Khan</i> Head master, Govt. High School, KHAZANA, Distr: Swat Service Verified w.e.f 1-12-93 to 30-11-94 from acq. Roll & other Record of this Office.</p> <p><i>M. J. Khan</i> Head master, Govt. High School, KHAZANA, Distr: Swat Service Verified w.e.f 1-12-94 to 30-11-95 from acq. Roll & other Record of this Office.</p> <p><i>M. J. Khan</i> Head master, Govt. High School, KHAZANA, Distr: Swat. Service Verified w.e.f 1-12-95 to 30-11-96 from acq. Roll & other Record of this Office.</p> <p><i>Saeed Ahmad</i> Head master, Govt. High School, KHAZANA, Distr: Swat. 1-12-95 30-11-96</p> <p><i>Saeed Ahmad</i> Head master, Govt. High School, KHAZANA, Distr: Swat. Service Verified w.e.f 1-12-96 to 30-11-97 from acq. Roll & other Record of this Office.</p>
<i>Saeed Ahmad</i> Head master, Govt. High School, Khazana Swat.	30/11/96	Annual increment	<i>Saeed Ahmad</i> Head master, Govt. High School, Khazana Swat.				
<i>Saeed Ahmad</i> Head master, Govt. High School, Khazana Swat.	30/11/97	Am/mc	<i>Am</i> Head master, Govt. High School, Khazana Swat.				
<i>Am</i> Head master, Govt. High School, Khazana Swat.	30/11/98	Am/mc	<i>Am</i> Head master, Govt. High School, Khazana Swat.				
<i>Am</i> Head master, Govt. High School, Khazana Swat.	30/11/99	Am/mc	<i>Am</i> Head master, Govt. High School, Khazana Swat.				
<i>Am</i> Head master, Govt. High School, Khazana Swat.	30/11/2000	Am/mc Promotion	<i>Am</i> Head master, Govt. High School, Khazana Swat.				
<i>Am</i> Head master, Govt. High School, Khazana Swat.	30/11/2001	Am/mc pay scale revised	<i>Am</i> Head master, Govt. High School, Khazana Swat.				
<i>Am</i> Head master, Govt. High School, Khazana Swat.	30/11/2002	Am/mc	<i>Am</i> Head master, Govt. High School, Khazana Swat.				

Sl. No 123 Dated 13/1/2001
 Pay of pay scale of pay w.e.f 1/12/2000 to 31/12/2000. Gross pay Rs 8258
 In Rs Faisal Rehman
 Total Rs 97/-

Am
Head Master,
Govt. High School,
Khazana, Distr: Swat

15

T.C
21/15

Service Verified v.e.f. 1-12-97
Other Receipt of this Office

10	11	12	13		14	15
			Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit to another Government		
Signature and designation of the head of the office or other attesting officer in attestation columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Period	Government to which debit	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
Am Head master, Govt. High School KHAZANA SWAT.	30/11/2003	Am/mc	Am Head master, Govt. High School KHAZANA SWAT.			30-11-98
Am Head master, Govt. High School KHAZANA SWAT.	30/11/2004	Am/mc	Am Head master, Govt. High School KHAZANA SWAT.			Am Head master, Govt. High School KHAZANA SWAT.
Am Head master, Govt. High School KHAZANA SWAT.	30/6/2005	Scale Revised 9/10/05	Am Head master, Govt. High School KHAZANA SWAT.			Am Head master, Govt. High School KHAZANA SWAT.
Am Head master, Govt. High School KHAZANA SWAT.	30/11/2005	Am/mc	Am Head master, Govt. High School KHAZANA SWAT.			Am Head master, Govt. High School KHAZANA SWAT.
Am Head master, Govt. High School KHAZANA SWAT.	30/11/2006	Am/mc	EK Head master, Govt. High School KHAZANA SWAT.			Am Head master, Govt. High School KHAZANA SWAT.
EK Head master, Govt. High School KHAZANA SWAT.	30/06/2007	Scale Revised 1-7-2007	EK Head master, Govt. High School KHAZANA SWAT.			Am Head master, Govt. High School KHAZANA SWAT.
Am Head master, Govt. High School KHAZANA SWAT.	30/11/2007	Am/mc	Am Head master, Govt. High School KHAZANA SWAT.			Am Head master, Govt. High School KHAZANA SWAT.
Am Head master, Govt. High School KHAZANA SWAT.	30/6/2008	Scale Revised 2008	EK Head master, Govt. High School KHAZANA SWAT.			Am Head master, Govt. High School KHAZANA SWAT.

(2005)
Office of the Accountant General
N.W.F.P. Peshawar
Pay Fixed in the revised basic pay scale 2005
of Rs. 2335-140-6755
at Rs. 5495/- on 01-07-2005
with effect from 01-07-2005

Accounts Officer
Pay Fixation Party N.W.F.P. Peshawar

Due to Move over from BPS-7 to BPS-8 Adjusted in BPS-8 vide DEO(M) Secy: Swat Saidu Shang Swat Notification No 87-68 Move over of TTs dated 10-01-2007

Departmental Pay Fixation in Revised
Pay Scale No. 7
@ Rs. 2220-120-5120 v.e.f. 1-12-2002
vide FO (PRC) 1-1-2001 dated 27-10-2001
Pay in Existing Scale No. 8 on 30-11-2001 Rs. 2720
Annual Increment in existing Pay Scale Rs. 88
TOTAL PAY: Rs. 2860
Eque/Next Stage in Revised P. Scale No. 7, Rs. 4350/-
Pay Fixed on 1-12-2001
With Next Annual Increment on 1-12-2002.

Govt. High School,
KHAZANA, Dist. Swat.

Head master,
Govt. High School,
KHAZANA, Dist. Swat.

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature of Government servant
RBPS-07 (3530-190-9230)							
I.T. Swat GHS. Khazana	Sub Person		Rs, 8090/- Pm			01/2008	فضال الرحمن
do	do		Rs, 8280/- Pm			01/2008	فضال الرحمن
do	do		Rs, 8470/- Pm			01/2009	فضال الرحمن
do	do		Rs, 8660/- Pm			01/2010	فضال الرحمن
RBPS-07 (5800-320-15400)							
do	do		Rs, 14440/- Pm			01/2011	فضال الرحمن
do	do		Rs, 14760/- Pm			01/2011	فضال الرحمن
RBPS-15 (8500-700-29500)							
do	do		Rs, 14800/- Pm			01/2012	فضال الرحمن

T.C.
A. B. 21/15

8 Signature of Government servant	9 Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc).	12 Signature of the head of the office or other attesting officer	13 Leave Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government Nature and duration of leave taken Period Government to which debitable	14 Signature of the head of the office or other attesting officer (2005)	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
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T.C.
21/11/15

Departmental Pay Fixation in Revised
 Pay Scale No. 07
 @ Rs. 2555-140-6755
 W.E.F. 1-7-2005 vide No. FD(FPO)1-1-2005
 Dated Bhubwar the July 9-2005
 Pay in Existing Scale No. 07 on 30-6-2005 Rs. 4740/-
 Equalizer Stage in Revised Pay Scale No. 07 Rs. 5495
 Pay Fixation on 1-7-2005 Rs. 5495
 With Max. annual increment on 1-12-2005

Amz
 Headmaster,
 Govt. High School,
 KHAZANA Dist. Soneb.

UNDERTAKING
 I Mr. Fazal Rahman working
 as T.T. Post at Govt. High School, Khazana
 do hereby give an undertaking to the effect
 that if any extra payment is made to me as a
 result of incorrect fixation of my pay
 w.e.f. 1-7-2005, it will be made good by
 recovery from my Pay/Fension/Gratuity.

Amz
 Headmaster,
 Govt. High School,
 KHAZANA Dist. Soneb.

01-12-2005
 30-11-2005
Amz

Service Verified w.e.f. 1-12-2005
 to 30-11-2007 from acq. Roll
 & other Record of this Office.

IK
 Headmaster,
 Govt. High School,
 KHAZANA Dist. Soneb.

T.C
 21/15

9 Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc).	12 Signature of the head of the office or other attesting officer	13 Leave Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government Nature and duration of leave taken Period: Government to which debitable	14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
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2007
 Departmental pay fixation in Revised pay scale No: 7 @ Rs. (2940 - 160-7740) w.e.f. 01-7-2007 vide No FD (PRC) 1-1-2007 Dated Peshawar the July, 20, 2007 Pay in Existing scale No: 7 on 30-6-07 Rs. 5775/- Equal/Next stage in Revised pay scale No: 7 Rs. 6620/- Fixed on 01-7-2007 Rs. 6620/- with Next Annual Increment on 1-12-2007

UNDER TAKING
 Mr. Fazal Rahman working against TT Post at G.H.S. Khazana Swat, is hereby given an undertaking to the effect that if any over payment is made to me as a result of incorrect Fixation of my pay w.e.f. 1-7-2007 It will be made good by recovery from my pay/pension/ Gratuity
 Sig: of Govt Servant

F.K.
 Head master,
 Govt-High School,
 KHAZANA Dist-Swat

(2008)

Departmental pay fixation on Revised pay scale No: 07 @ Rs. (3530-190-9230) w.e.f 1-7-2008 vide finance Deptt. Notification No: FD (PRC) 1-1/2008 dated 10-07-2008 pay in Existing pay scale No: 07 on 30-6-2008 Rs. 6780/- Equal/Next stage in Revised pay scale No: 07 Rs. 8090/- on 01-7-2008 pay fixed in Revised pay scale No: 07 on 01-7-2008 Rs. 8090/- with next Annual Increment on 01-12-2008

F.K.
 Head master,
 Govt-High School,
 KHAZANA Dist-Swat
 Service Verified w.o.f.d.d. 12-2007 to 30-11-2009 from Reg. Roll & other Record of this Office.

F.K.
 Head master,
 Govt-High School,
 KHAZANA Dist-Swat
 30-11-2009

F.K.
 Head master,
 Govt-High School,
 KHAZANA Dist-Swat

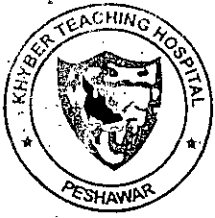
49

Pay in Existing pay scale Not on 30.6-8-760/2012

pay fixed on 17/2012 pay scale No 15¹⁵ R. 14800/-

9 Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or award for misconduct
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">T.C. 21/15</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">[Signature]</p>					<p>Period to which debitable</p>	<p>Government to which debitable</p> <p>Head Master, Govt. High School, Karnataka, India.</p>	<p>TT Post Upgraded from Bps 67 to Bps-15 vide Finance Deptt. No. SO(FR)FD/10-22(E) 070 Dated 26/6/2012 Govt of K.P.</p> <p>[Signature] Head Master, Govt. High School, Karnataka, India.</p>

[Handwritten mark]



Assistant Professor Medicine *Amman B 18*
DR. SALEEM IQBAL

MBBS, FACP, FCPS.
 Consultant Medical Specialist



Assistant Professor, Khyber Medical College, Peshawar
 Visting Physician Khyber Teaching Hospital Peshawar,
 Clinic: B-14, Rahim Medical Centre, Near Amin Hotel,
 Hashtnagri, G.T. Road, Peshawar.

Not Valid For Court Of Law

Name Fazle Nazam Age 50 y Sex ♀ From Swat Date 13/7/10

Q
 Tab Silmar - 50
 2.6 - 14
 Tab. Astoplex-B - 50 -
 2.6 - 10
 Tab Dome one 10mg - 50
 2.6 - 14
 2.6 - 14

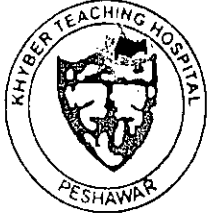
T.C.P.
5/11/2014

See

فون: 091-2218843
 چھٹی: بروز ہفتہ اتوار

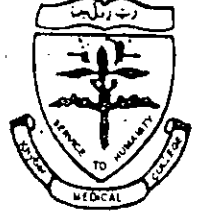
کنسلٹنٹ میڈیکل سپیشلسٹ
 کلینک بی 14 رحیم میڈیکل سنٹر، جی ٹی روڈ نزد امین ہوٹل، ہاشٹنگری پشاور

ڈاکٹر سلیم اقبال
 ایم بی بی ایس، ایف اے سی بی، ایف سی بی ایس



Assistant Professor Medicine
DR. SALEEM IQBAL

19



MBBS, FACP, FCPS.
 Consultant Medical Specialist

Assistant Professor, Khyber Medical College, Peshawar
 Visiting Physician Khyber Teaching Hospital Peshawar,
 Clinic: B-14 Rahim Medical Center, Near Amin Hotel,
 Hashtanagri, GT.Road, Peshawar.

Not Valid For Court Of Law

Name Fazle Rehman Age 55 From Swat Date 01/11/14

On Adabo since 6510.

16

Tab Adabo since 6510

V.G. - 110

T.C
 5/11/14

DR. SALEEM IQBAL
 MBBS, FACP, FCPS
 Assistant Professor Medicine KTH
 Clinic: Rahim Medical Centre Peshawar

90

GUL MEDICAL LABORATORY

Dr. Nazir Shah
M.B.B.S (PAK)
F.C.P.S (PAK)

Farmanullah
DMLT
B. Sc (MLT)
Medical Technologist



C-6, 3rd Floor, Rahim Medical Center, G.T. Road, Peshawar (Pakistan)

Patient Name: Fazle Rehman	Sex: M
Consultant: Dr. Saleem Iqbal	Date: 25 / 08 / 2010
Investigation Req: HBS ELISA	Lab No: 01

TEST REPORT

T.C.
[Signature]
5/11/14

Hepatitis B Surface Antigen -----13.43 (Reactive)

Cut off Index For Non - reactive Hepatitis B Surface Antigen (1.0)

(3rd Generation)



21

GUL MEDICAL LABORATORY

Dr. Nazir Shah

M.B.B.S (PAK)
F.C.P.S (PAK)

Farmanullah

DMLT
B. Sc (MLT)
Medical Technologist



C-6, 3rd Floor, Rahim Medical Center, G.T. Road, Peshawar (Pakistan)

Patient Name: Fazal Rahim	Sex: M
Consultant: Dr: Saleem Iqbal	Date: 08/11/2010
Investigation: Absolut Value	Lab No: 01

CBC REPORT			
TEST	RESULT	UNITS	N.VLUES
HB %	11.0	G/DL	12—16
TLC	9,800	/Cmm	Adult:4000,11000 Neonates:10,000-25,000 1-Year: 6,000—15,000 4-Year 6,000—15,000 8—12 Year:4,500—13,500

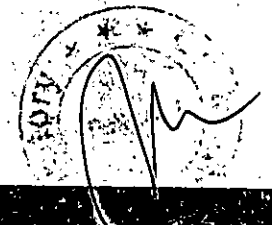
DLC

Neutrophils	64	%	20—70
Lymphocytes	32	%	15—35
Eosinophils	02	%	01—04
Monocytes	02	%	02—08
PleetelesCount	2,70,000	/Cmm	1,50,000—4,50,000

ABSOLUTE VALUE

TRBC	3.9	4.00—6.00 /Cmm
PCV	28.2	M:45—55/F:35—45 %
MCV	92.0	76—96 fl
MCH	27.4	27.0—32.0 pg
MCHC	32.2	30.0—35 g/dl

T.C. Saleem Iqbal



List of Schools

SWAT
MALE

School Code	District	School Name	UC	CT	DM	PET	AT	TT	Car	PST	Total Vacancies
321001	SWAT	GHS ASHORAN		1		1	1	1	1		5
321002	SWAT	GHS BAHRAIN		2				1			3
321003	SWAT	GHS BANDAI						1			1
321004	SWAT	GHS BANJOOT						1			1
321005	SWAT	GHS BRAWAL						1			1
321006	SWAT	GHS CHAIL			1		1	1			3
321007	SWAT	GHS DEOLAI						1			1
321008	SWAT	GHS GALOCH						1			1
321009	SWAT	GHS GALDUCH					1				1
321010	SWAT	GHS GAT					1	1			2
321011	SWAT	GHS GOGDARA						1			1
321012	SWAT	GHS GURNAI			1	1	1	1			4
321013	SWAT	GHS JAMBIL						1	1		2
321014	SWAT	GHS KEDAM							1		1
321015	SWAT	GHS KHAZANA						1			1
321016	SWAT	GHS KIDAM			1			1			2
321017	SWAT	GHS KIDAM SWAT					1				1
321018	SWAT	GHS KOTLAI							1		1
321019	SWAT	GHS MANAI					1				1
321020	SWAT	GHS MANYAR						1	1		2
321021	SWAT	GHS MATILTAN							1		1
321022	SWAT	GHS MATTA							1		1
321023	SWAT	GHS PARRAI						1			1
321024	SWAT	GHS PISHMAL						2			2
321025	SWAT	GHS QALAGAY							1		1
321026	SWAT	GHS QANDIL					1				1
321027	SWAT	GHS SHAH DHERAI						2			2
321028	SWAT	GHS SHALHAND					1				1
321029	SWAT	GHS SHALPIN						2			2
321030	SWAT	GHS SHAWAR							1		3
321031	SWAT	GHS SHERPALAM						1	1		2
321032	SWAT	GHS SUBANR					1				1
321033	SWAT	GHS TOPSIN					1				1
321034	SWAT	GHS UTROOR			1						1
321035	SWAT	GHSS KALAM						1	1		2
321036	SWAT	GHSS KHWAZA KHELA						1			1
321037	SWAT	GHSS KISHAWRA						1			1
321038	SWAT	GHSS KISHWARA					1				1
321039	SWAT	GHSS MANKEYAL						2	1		3
321040	SWAT	GHSS MANKYAL				1					1
321041	SWAT	GHSS SHAMOZI					1	1			2
321042	SWAT	GMPS JAWARO BIAKAND	Arkot							1	1
321043	SWAT	GMS ALIGRAMA					1				1
321044	SWAT	GMS ANAKAR		1	1			1			3
321045	SWAT	GMS ANAKER					1				1
321046	SWAT	GMS AREEN		2							2
321047	SWAT	GMS ASHAR BANR					1				1
321048	SWAT	GMS AYEEN		2				1			3
321049	SWAT	GMS AZAD BANDA						1			1
321050	SWAT	GMS AZADA BANDA			1						1
321051	SWAT	GMS BAFAR						1			1
321052	SWAT	GMS BAR BARGIN					1				1
321053	SWAT	GMS BARGIN						1			1
321054	SWAT	GMS BAYUN		1	1						2
321055	SWAT	GMS BEHAR		1			1				2
321056	SWAT	GMS BESHIGRAM						1			1
321057	SWAT	GMS CHAM GARAI						1			1
321058	SWAT	GMS CHAMGARAI					1				1
321059	SWAT	GMS CHARMA			1		1				2
321060	SWAT	GMS CHINKOLAI					1				1
321061	SWAT	GMS DABERGAI				1					1
321062	SWAT	GMS DAD					1				1
321063	SWAT	GMS DAKORAK					1				1
321064	SWAT	GMS DAMANA					1	1			2
321065	SWAT	GMS FAZAL BANDA			1						1
321066	SWAT	GMS GABRAL					1	1			2
321067	SWAT	GMS GANAJIR						1			1

T.C.
5/11/2014

321068	S	GMS GHAKHI BANDA					1		1
321069	SWAT	GMS GODA					1		1
321070	SWAT	GMS KALALGAY			1				1
321071	SWAT	GMS KOTA				1			1
321072	SWAT	GMS LAKHAR				1			1
321073	SWAT	GMS LALKOO			1				1
321074	SWAT	GMS TIRAT				1			1
321075	SWAT	GPS ALLAABAD	Gulibagh					1	1
321076	SWAT	GPS AMLOOK DARA	Ghalegay					1	1
321077	SWAT	GPS AWAR PATAY	Kalakalay					1	1
321078	SWAT	GPS AWESHAH	chuprial					1	1
321079	SWAT	GPS BAHDAR BANDA	Koza Bandal					1	1
321080	SWAT	GPS BALALAI	Gulibagh					1	1
321081	SWAT	GPS BARA DURESHKHELA	Dureshkhela					1	1
321082	SWAT	GPS BEHRAIN	Behrain					1	1
321083	SWAT	GPS BELA BATAKA	Shah Dehrai					2	2
321084	SWAT	GPS BODAY GHAR	AKMB					2	2
321085	SWAT	GPS BODIGRAM	Baidara					1	1
321086	SWAT	GPS CHARBAGH	Charbagh					1	1
321087	SWAT	GPS CHARMA	Gwaleari					1	1
321088	SWAT	GPS CHATIKAL	Beha					1	1
321089	SWAT	GPS CHINDA KHWARA	Bar Aba Khel					1	1
321090	SWAT	GPS DARA DABARGAY	Bashigram					2	2
321091	SWAT	GPS DARA PARAI	Barikot					1	1
321092	SWAT	GPS DARDYAL	Tall					1	1
321093	SWAT	GPS DEDAWAR	Shamozai					1	1
321094	SWAT	GPS DITPANAI	Matta/Kharerai					1	1
321095	SWAT	GPS FAZAL ABAD DEOLAI	Deolai					1	1
321096	SWAT	GPS GANORAI	Kokarai					1	1
321097	SWAT	GPS GARDAM	Beha					1	1
321098	SWAT	GPS GOLDEN	Deolai					1	1
321099	SWAT	GPS JALOO	AKMB					1	1
321100	SWAT	GPS JANIMAR	Tirat					2	2
321101	SWAT	GPS KABAL KOO	Gwaleari					2	2
321102	SWAT	GPS KALAM OLD	Kalam					2	2
321103	SWAT	GPS KANATAI	Gwaleari					1	1
321104	SWAT	GPS KANJU NO.2	Kanju					1	1
321105	SWAT	GPS KIDAM	Balakot					1	1
321106	SWAT	GPS KOZ BARGIN	Shin					2	2
321107	SWAT	GPS MAHAK	Kalakalay					1	1
321108	SWAT	GPS MANDAN	AKMB					2	2
321109	SWAT	GPS MANGLOR NO.2	AKMB					1	1
321110	SWAT	GPS MIANDAM	Miandam					1	1
321111	SWAT	GPS NAZAR ABAD	Arkot					1	1
321112	SWAT	GPS PINDA SHAH PATAY	Koz Aba Khel					2	2
321113	SWAT	GPS QANDIL	Qandail					1	1
321114	SWAT	GPS RADOKRAI	Barthna					1	1
321115	SWAT	GPS SAMBAT	Baidara					1	1
321116	SWAT	GPS SAMBAT CHAM	Baidara					1	1
321117	SWAT	GPS SHAHEED BABA NO.2	Kanju					1	1
321118	SWAT	GPS SHAKAR DARA	Pir Kalay					1	1
321119	SWAT	GPS SHALKYAR	Bashigram					1	1
321120	SWAT	GPS SHER PALAM NO.2	Pir Kalay					1	1
321121	SWAT	GPS SHORSHAHI	Shawar					2	2
321122	SWAT	GPS SUBANR	Arkot					1	1
321123	SWAT	GPS SIRSENAI NO.2	Bar Aba Khel					1	1
321124	SWAT	GPS TALIGRAM	Taligram R/S-18					1	1
321125	SWAT	GPS TALINGA	Tirat					2	2
321126	SWAT	GPS TANGBANR	Pir Kalay					1	1
321127	SWAT	GPS TANGO	Shalpin R/S-22					1	1
321128	SWAT	GPS ZIARAT SWEGALAI	Koz Aba Khel					1	1
321129	SWAT	GPS ZWALA	Jano/Chamtaiai					1	1
321130	SWAT	GPS JAGAH	Behrain					1	1
321131	SWAT	GPS.TOTANO BANDAI	Totano Bandai					1	1

T.C.
 5/11/2014

Annexur
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OFFICE OF THE DISTRICT EDUCATION OFFICER, MALE DISTRICT, SWAT.

OFFICE ORDER

Consequent upon the post of TT of the following schools advertised through NTS. The DEO (M) Swat has been pleased to transfer/adjust the TT of the following schools on their own pay and scale at the schools noted against each TT post in the interest of Public service with immediate effect.

S.No.	Name	From	To	Remarks
01	Hazrat Hussain TT	GHS Ashoran	GMS Jalbanr	Against Vacant Post
02	Izharul Haq TT	GHS Chail	GMS Torwal	-do-
03	Attaullah S.TT	GHS Deolai	GHS Shalhand	-do-
04	Noorul Wahab TT	GHS Galoch	GHSS Kabal	-do-
05	Abdul Salam TT	GHS Gogdara	GHS Kanju	-do-
06	Fazal Rahman TT	GHS Khazana	GHS Qalagay	-do-
07	Rashid Ahmad STT	GHS Manyar	GHS Dehrai	-do-
08	Rashid Ahmad STT	GHS Parrai	GHS Dardyal	-do-
09	Fazal Rahman TT	GHS Shahdehrai	GMS Deolai	-do-
10	Abdul Wasi TT	GHS Shalpin	GMS Behar	-do-
11	Ali Rahman TT	GHSS Kishawra	GMS Bishbanr	-do-
12	Habibur Rahman TT	GMS Bashigram	GHS Rahat Kot	-do-
13	Asfandyar TT	GMS Azad Banda	GMS Areen	-do-
14	Nowsherawan TT	GMS Damana	GMS Jarry	-do-
15	Rashid Ahmad TT	GMS Chamgharai	GMS Mairagai	-do-
16	Muhammad Tliullah TT	GHS Khwaza-Khela	GMS Dad K.Khela	-do-
17	Gul Shah zada TT	GHSS Shamozi	GMS Taran	-do-
18	Sayed Muhammad Shah TT	GHS Sherpalam	GHS Sijbanr	-do-

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

(MUHAMMAD UZAIR ALI)
DISTRICT EDUCATION OFFICER
MALE SWAT.
Dated: 04-10-2014

T.C.
5/10/2014

Endst; No.1709-29/TT

Copy to:-

01. The Director (E & S) Education KPK Peshawar.
02. The District Accounts Officer Swat.
03. The Principal/Head Master Concerned.
04. The Teacher Concerned.
05. PA to DEO (M) Swat.

DISTRICT EDUCATION OFFICER
MALE SWAT.

4/10/14

DISTRICT EDUCATION OFFICER
MALE SWAT.

Annexure
"E"

26

٢٠ ابريل ٢٠١٥

To: The District Education Officer (M),
Swat Saidu Sharif at Gul Kada.

Subject: APPEAL FOR CANCELLATION OF TRANSFER ORDER

Respected Sir,

I have the honour to say and submit a few line for your favour
and further necessary action please,

That I am working against T.T Post at GHS.KHAZANA
Distt:Swat and have been transferred to GHS/ ~~GHS~~ Salagay

Swat Vrlde Your office Order No. 1709-29 T.T

Dated: 04-10-14 2014/ I am serving from as T.T) 20-11-1984 in this
School and I am the permanent Resident of Union Council (Shamozai) Garhi and
no other person of this area working as T.T. out from U/Council Shamozai other
than I am old man and have 56 years of age in this age it is very difficult to
perform my duty in far plang areas only three years remaining in my supernuation
therefore requesting in your kind control to cancelled my transfer order I shall be
very thankful to you.

فازال رحمان

Yours Obediently
Fazal Rahman
Post T.T GHS.Khazana
Distt:Swat

T.E
Fazal Rahman
21/01/2015

No. 669 /Dated 11/10/ 2014

Forwarded to the District Education Officer (M)Swat with the remarks that the
appeal/application is based on facts and other than Mr.Fazal Rahman T.T of this
school is an old age person he is 56 seven year old and also a patient therefore
requesting to cancel his transfer order

The application is forwarded
for necessary action please.

Nasir
Head Master,
Govt. High School,
Khazana, Distt: Swat.

(Better Copy)

page (26-A)

To,

The District Education Officer(M)
Swat saidu Sharif at Gul kada.

Subject; **APPEAL FOR CANCELLATION OF TRANSFER ORDER**

Respected Sir,

I have the honor to say and submit a few lines for your favour consideration and farther necessary action please,

That I am working against T.T Post at GHS KHAZANA District Swat and have been transferred to GHS Qalagay

Swat vide your office order NO. 1709-29-TT

Dated 04-10-2014/ I am serving from as T.T 20-11-1984 in this school and I am the permanent resident of Union Council (Shamozai) Garhi and no other person of this area working as T.T out form U/C Shamozai other than I am old man and have 56 years of age in this age it is very difficult to perform my duty in far flung areas only three years remaining in my supenuation therefore requested in your kind control to cancel my transfer order I shall be very thankful to you.

sd/-

Yours obediently

Fazal Rahman

Post T.T GHS Khazana

Distt: Swat

No ---669---/Dated---11-10-2014

Forward to the District Education Officer (M) Swat with the remarks that the appeal/ Application is based on facts and other than Mr.Fazal Rahman T.T of this School and old age person. He is 56(fifty six) years old and also a patient therefore requesting to cancel his transfer Order.

The application is forwarded
For necessary action please,

Head Master,
Govt High School,
Khazana, District Swat.



**OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
Swat (Cell # 0946 9240209-228)**

APPOINTMENT

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the vacant TT posts on one year Ad hoc School based policy in BPS: 15 (Rs.8500-700-29500) fixed plus usual allowances as admissible under the Rules and existing policy of the Provincial Government, in Teaching Cadre on the terms & conditions given below with effect from the date of their taking over charge.

S. #	Name of candidate	Father's Name	D/O Birth	Score	Remarks
1.	Mr. Afzal Shah	Mian Badshah	04.4.1983	132.44	GHS: Sherpalam
2.	Mr. Ataulah	Fazal Hakeem	08.01.1987	131.8	GHS: Manyar
3.	Mr. Ubaid Ullah	Ismail	01.11.1981	131.25	GHS: Brawal
4.	Mr. Habib un Nabi	Ghulam Nabi	01.04.1983	131.09	GMS: Galoch
5.	Mr. Ihsanullah	Shah Dad	05.05.1986	130.72	GHSS: Kishawra
6.	Mr. Umar Khatab	Haji Umar Farak	10.04.1983	130.26	GHS: Gurnai
7.	Mr. Saif Ullah	Adil Muhammad Khan	13.10.1984	129.72	GHS: Bandal
8.	Mr. Amin ul Haq	Salamul Haq	02.01.1975	128.39	GMS: Ayeen
9.	Mr. Gohar Ali	Sardar Ali	01.04.1982	127.34	GHS: Jambil
10.	Mr. Naeem Ullah	Rahim Shah	10.03.1981	127.01	GMS: Garajir
11.	Mr. Wazir Zada	Musafar	15.09.1980	125.59	GMS: Azad-Banda
12.	Mr. Muhammad Ishaq	Azim Khan	23.03.1986	125.3	GHS: Gogdara
13.	Mr. Muhammad Alam	Aziz ur Rahman	03.04.1981	125.17	GMS: Anakar
14.	Mr. Shahi Nawab	Shahi Taj Bacha	05.11.1983	124.9	GHS: Parrai
15.	Mr. Fazal Wadood	Musafar	01.01.1985	124.77	GMS Damana
16.	Mr. Imtiaz Ahmad	Abdul Hassan	01.04.1976	124.59	GHS: Chail
17.	Mr. Abdur Rahman	Mohib ul Haq	15.05.1981	124.43	GHSS: Shamozl
18.	Mr. Rahmat Ali	Tasir Jan	01.01.1987	124.39	GMS: Goda
19.	Mr. Muhammad Ayaz	Sher Zada	05.03.1977	124.37	GHSS: Kedam
20.	Mr. Liaqat Ali	Muhammad Ghawri	16.02.1988	124.37	GHSS: Mankeyal

T. C
9/10/2015

22	Mr. Inayatullah	Muhammad Dawran	25.04.1987	124.11	GHS: Pishmal
23.	Mr. Nadar Khan	Amir Zada	10.05.1981	123.7	GHS: Ashoran
24.	Mr. Amin ul Haq	Aziz ur Rahman	01.04.1978	123.0	GHS: Banjoot
25.	Mr. Abdul Salam	Abdul Wahab	10.05.1984	122.54	GMS: Gabral
26.	Mr. Imtiaz Ali	Haji Muhammad Ali	23.07.1991	121.97	GMS: Beshigram
27	Mr. Atta ur Rahman	Shams ur Rahman	04.04.1977	121.85	GHS: Shah Dera
28.	Mr. Nasar Ali	Saleh Gul	01.12.1982	121.55	GHS: Bahrain
29.	Mr. Bakhte Rahman	Bakht Mashal	10.12.1979	121.41	GHS: Bar Bargin
30.	Mr. Akbar Hussain	Amir Zada	10.05.1988	121.33	GHSS: Kalam
31.	Mr. Khurshid Iqbal	Abdul Jabbar	24.04.1979	121.26	GHS: Deolai
32.	Mr. Ashraf Ali	Ahmad Khan	10.11.1979	121.06	GHS: Khazana
33	Mr. Shamsul Iqbal	Ali Shah	05.02.1989	120.82	GHS: Shalpin
34	Mr. Aqal Zada	Manasab Khan	15.08.1988	120.76	GHS: Gat
35	Mr. Bahadar Shir	Muhammad Afzal	04.02.1978	120.12	GHSS:KhwazaKhela
36	Mr. Shahid Hussain	Wali-Ahad	20.03.1987	119.48	GMS: Cham Dera
37	Mr. Hassan Ahmad	Muhammad Amin Badshan	01.03.1984	112.43	GMS: Bafar

Terms & Conditions

1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned.
3. Appointment is purely on temporary & ad hoc basis for one year with effect from 27.10.2014 to 26.10.2015.
4. He should not be handed over charge if he exceeds 38 (Thirty Eight) years or below 18 years of age.
5. Appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities, anyone found producing bogus certificate will be reported to the Law enforcing agencies for further action.
6. His services are liable to termination on one month's prior notice from either side. In case of resignation without notice his one month pay /allowances shall be forfeited to the Government.
7. Pay shall not be drawn until and unless a certificate issued by this office that his documents are verified.
8. He should join his post within 30 days of the issuance of this notification. In case of failure to join the post within 30 days of the issuance of this Notification his appointment shall stand expired automatically and no subsequent appeal etc. shall be entertained.
9. Health & Age Certificate should be produced from the Medical Superintendent before taking over charge.
10. He will be governed by such Rules and Regulation as may be issued from time to time by the Government.

(VIALE)
9-228)

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FAX NO. : 09469240329

28 Oct. 2014 2:57AM P3

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11. His services shall be terminated at any time in case his performance is found unsatisfactory during his service period. In case of misconduct, he shall be proceeded under the relevant rules & regulations announced from time to time.
12. His appointment is Ad hoc and school based. He shall have to serve at the place of posting and his service is not transferable to any other station.
13. Before handing over charge his documents may be checked and if found bogus or irrelevant as per qualification and rules charge of the post may not handed over.

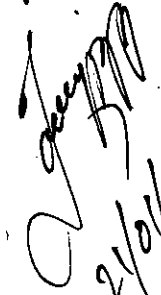
(Prof. MUHAMMAD UZAIR ALI)
DISTRICT EDUCATION OFFICER
SWAT GUL KADA

Endst No: ³⁷¹⁸⁻²⁵ /TT/ Appointment/Ad hoc/NTS dated: ~~1-10-2014~~ 27-10-2014

Copy of the above is forwarded for information & necessary action to :-

1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. The District Comptroller of Accounts Swat.
3. The Principal/Headmaster concerned.
4. The Deputy DEO Male Local Office.
5. The B&AO Local Office.
6. The Supdt Secondary Local Office.
7. The Candidates concerned.
8. PA to DEO Local Office.


DISTRICT EDUCATION OFFICER
(MALE) SWAT GUL KADA

T.C

21/10/2014

APPOINTMENT NTS 2014 SWAT

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Annexure
"G"

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تصحيح - کابل کوڈٹر انسٹارڈر

OFFICE OF THE
DISTRICT EDUCATION OFFICER
(MALE) SWAT

CORRIGENDUM:

Consequence upon the impartial modification in this office order No. 1709-29 04/10/2014. The following TT are hereby transfer to the school noted against each on their own pay and scale in the interest of public serves w.e.f the date of taking over charge.

S.No	Name and Designation	From	To	Remarks
1.	Noor Muhammad TT	GHS Banjot	GMS Aligrama	Against V/Post
2.	Nawsherwan TT GMS Damana	U/T to GMS Jarrai	GHS Rahat Kot	Against V/Post
3.	Asfandyar TT GMS Azad Banda	U/T to GMS Areen	GMS Lalkoo	Against V/Post
4.	Habibur Rahman TT GMS Bashigram	U/T to GHS Rahat Kot	GMS Shinkoo	Against V/Post
5. ✓	Fazal Rahman TT GHS Khazana	U/T to GHS Qalagay	GHSS Kabal	Against V/Post
6.	Khan Muhammad TT	GMS Anakar	GHS Matiltan	Against V/Post
7.	Abdul Wasih TT GHS Shalpin	U/T to GMS Bihar	GMS Babo	Against V/Post
8.	Syed Manawar Shah TT GHS Sherpalam	U/T to GHS Sijbanr	GHSS Matta	Against V/Post

(Prof: Muhammad Uzair Ali)
DISTRICT EDUCATION OFFICER (M)
SWAT

Endst: No: 4848-55

Dated 1/11/2014.

Copy forwarded to:

1. The District Account Officer Swat.
2. The Head Master Concerned.
3. -10 The Teacher concerned.
11. P.A to the DEO (M) local office.

DISTRICT EDUCATION OFFICER (M)
SWAT

T.C
2/10/2015

01/11/14

بعدالت جناب سروس ٹریبونل خیبر پختونخواہ بمقام پشاور کیمپ کورٹ گلگندہ ضلع سوات

تیمت ایک روپیہ	کورٹ نمبر
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تعمیر ۲۰ منجانب

ماہ جنوری

21

مورخہ

محکمہ تعلیم بذریعہ سیکرٹری خیبر پختونخواہ وغیرہ

نام

مقدمہ فضل الرحمان

سروس اپیل

دعویٰ

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام پشاور و ضلع سوات کیلئے طارق عزیز ایڈووکیٹ (ہائی کورٹ) و شاکر اللہ ایڈووکیٹ مقرر کر کے اقرار کیا جاتا ہے کہ صاحبان موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا۔ نیز وکلاء صاحبان کو زامنی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبالی دعویٰ اور درخواست ہر قسم کی تصدیق غرض اس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمدگی اور منسوخی دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ بصورت ضرورت مذکور کے گل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اس کا ساختہ و برداختہ منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے ہوگا اس کے مستحق ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہو یا حد سے باہر ہو تو وکلاء صاحبان پابند نہ ہونگے کہ پیروی مقدمہ مذکورہ کی پیروی کرے، لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

۲۰۱۵

ماہ جنوری

21

المرقوم

العبد فضل الرحمن گواہ شہادہ العبد
فضل الرحمان ولد سوال فقیر کنہ سینگورہ حال کھڑی ٹوکی نہ زر ضلع دشموزی بمقابلہ سوات ضلع سوات

کیلئے منظور ہے

سوات بمقام پشاور و ضلع سوات

Attested & Accepted by

Tarig AZIZ Advocate

8

Shakirullah Advocate

21-01-2015

The Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Subject: APPEAL NO.209 OF 2015
FAZAL REHMAN ----- Appellant/Petitioner

VERSUS

SECRETARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR ----- Respondent

Respondent No.4
ASHRAF ALI S/O AHMAD KHAN
R/O Ghalegay Tehsil Barikot Distt: Swat (GHS Khazana Swat).

Respectfully Sheweth,


The Respondent No.4 submits as under;

With reference to your appeal No.209 of 2015, Fazal Rehman appellant/petitioner versus Secretary Education Khyber Pakhtunkhwa, Peshawar, respondent No.4, I beg to state some points regarding the above mentioned subject.

- 1) That an advertisement published in the Daily Mashriq dated 8th January 2014 regarding certain posts lying vacant in Education Deptt: of Distt: Swat (Annex-A).
- 2) That according to the advertisement, the application form was available to be downloaded from the NTS-Website.
- 3) That alongwith the application form a detailed list of all male schools in Distt: Swat was also available.
- 4) That according to the said list, I applied for 05 schools, whereas GHS Khazana was among one of them (Annex-B).
- 5) I (respondent No.4) appeared in the NTS Exam held on 23rd February 2014 under roll No.3250605 (Annex-C) and as a result was appointed T.T (BPS-15) in GHS Khazana, against the vacant post, vide D.E.O (Male) Order, bearing endorsement No.3718-25/TT/Appointment/Ad hoc/NTS dated 27/10/2014 (Annex-D)
- 6) Furthermore, it is worth to bring in your kind notice that w.e.f 01/07/2015 a post of TT is going to become vacant in GHS, Ghalegay, due to retirement of already serving incumbent. If deem proper I offer my services and prayed to be transferred/posted to the said location.

In the light of above mentioned facts, it is therefore most humbly requested that my case may kindly be decided as you deem fit, on real grounds and with sympathetic consideration.

Respondent No.4


ASHRAF ALI
S/O AHMAD KHAN
GHS Khazana, Swat.

Dated: 04/05/2015

List of Schools

SWAT
MALE

School Code	District	School Name	UC	GT	DN	PE	AT	IT	Car	PS	Total Vacancies
321001	SWAT	GHS ASHORAN		1		1	1	1	1		5
321002	SWAT	GHS BAHRAIN		2				1			3
321003	SWAT	GHS BANDAI						1			1
321004	SWAT	GHS BANJOOT						1			1
321005	SWAT	GHS BRAWAL						1			1
321006	SWAT	GHS CHAIL		1			1	1			3
321007	SWAT	GHS DEOLAI						1			1
321008	SWAT	GHS GALOCH						1			1
321009	SWAT	GHS GALOUCH					1				1
321010	SWAT	GHS GAT					1	1			2
321011	SWAT	GHS GOGDARA	2				1	1			1
321012	SWAT	GHS GURNAI		1	1		1	1			4
321013	SWAT	GHS JAMBIL						1	1		2
321014	SWAT	GHS KEDAM							1		1
321015	SWAT	GHS KHAZANA	1					1			1
321016	SWAT	GHS KIDAM		1				1			2
321017	SWAT	GHS KIDAM SWAT					1				1
321018	SWAT	GHS KOTLAI							1		1
321019	SWAT	GHS MANAI					1				1
321020	SWAT	GHS MANYAR	3				1	1			2
321021	SWAT	GHS MATILTAN							1		1
321022	SWAT	GHS MATTA							1		1
321023	SWAT	GHS PARRAI	2				1				1
321024	SWAT	GHS PISHMAL						2			2
321025	SWAT	GHS QALAGAY							1		1
321026	SWAT	GHS QANDIL					1				1
321027	SWAT	GHS SHAH DHERAI						2			2
321028	SWAT	GHS SHALHAND					1				1
321029	SWAT	GHS SHALPIN						2			2
321030	SWAT	GHS SHAWAR							1		3
321031	SWAT	GHS SHERPALAM						1	1		2
321032	SWAT	GHS SUBANR					1				1
321033	SWAT	GHS TOPSIN					1				1
321034	SWAT	GHS UTROOR			1						1
321035	SWAT	GHSS KALAM						1	1		2
321036	SWAT	GHSS KHWAZA KHELA						1			1
321037	SWAT	GHSS KISHAWRA						1			1
321038	SWAT	GHSS KISHWARA					1				1
321039	SWAT	GHSS MANKEYAL						2	1		3
321040	SWAT	GHSS MANKYAL			1						1
321041	SWAT	GHSS SHAMOZI	2				1	1			2
321042	SWAT	GMPS JAWARD BIAKAND	Arkot							1	1
321043	SWAT	GMS ALIGRAMA					1				1
321044	SWAT	GMS ANAKAR		1	1			1			3
321045	SWAT	GMS ANAKER					1				1
321046	SWAT	GMS AREEN		2							2
321047	SWAT	GMS ASHAR BANR					1				1
321048	SWAT	GMS AYEEN		2				1			3
321049	SWAT	GMS AZAD BANDA						1			1
321050	SWAT	GMS AZADA BANDA		1							1
321051	SWAT	GMS BAFAR						1			1
321052	SWAT	GMS BAR BARGIN					1				1
321053	SWAT	GMS BARGIN						1			1
321054	SWAT	GMS BAYUN		1	1						2
321055	SWAT	GMS BEHAR		1			1				2
321056	SWAT	GMS BESHIGRAM						1			1
321057	SWAT	GMS CHAM GARAI						1			1
321058	SWAT	GMS CHAMGARAI					1				1
321059	SWAT	GMS CHARMA		1			1				2
321060	SWAT	GMS CHINKOLAI					1				1
321061	SWAT	GMS DABERGAI				1					1
321062	SWAT	GMS DAD					1				1
321063	SWAT	GMS DAKORAK					1				1
321064	SWAT	GMS DAMANA					1	1			2
321065	SWAT	GMS FAZAL BANDA		1							1
321066	SWAT	GMS GABRAL					1	1			2
321067	SWAT	GMS GANAJIR						1			1

UC CT DM PER AT TY @ Pst Total

321068	SWAT	GMS GHAKHI BANDA					1		1
321069	SWAT	GMS GODA					1		1
321070	SWAT	GMS KALAGAY				1			1
321071	SWAT	GMS KOTA					1		1
321072	SWAT	GMS LAKHAR					1		1
321073	SWAT	GMS LALKOO				1			1
321074	SWAT	GMS TIRAT					1		1
321075	SWAT	GPS ALLAABAD	Gulibagh					1	1
321076	SWAT	GPS AMLOOK DARA	Ghalegay					1	1
321077	SWAT	GPS AWAR PATAY	Kalakalay					1	1
321078	SWAT	GPS AWESHAM	chuprial					1	1
321079	SWAT	GPS BAH DAR BANDA	Koza Bandal					1	1
321080	SWAT	GPS BALALAI	Gulibagh					1	1
321081	SWAT	GPS BARA DURESHKHELA	Dureshkhela					1	1
321082	SWAT	GPS BEHRAIN	Behrain					1	1
321083	SWAT	GPS BELA BATAKA	Shah Dehrai					2	2
321084	SWAT	GPS BODAY GHAR	AKMB					2	2
321085	SWAT	GPS BODIGRAM	Baidara					1	1
321086	SWAT	GPS CHARBAGH	Charbagh					1	1
321087	SWAT	GPS CHARMA	Gwaleari					1	1
321088	SWAT	GPS CHATIKAL	Beha					1	1
321089	SWAT	GPS CHINDA KHWARA	Bar Aba Khel					1	1
321090	SWAT	GPS DARA DABARGAY	Bashigram					2	2
321091	SWAT	GPS DARA PARAI	Barikot					1	1
321092	SWAT	GPS DARDYAL	Tali					1	1
321093	SWAT	GPS DEDAWAR	Shamozal					1	1
321094	SWAT	GPS DITPANAI	Matta/Khareral					1	1
321095	SWAT	GPS FAZAL ABAD DEOLAI	Deolai					1	1
321096	SWAT	GPS GANORAI	Kokaral					1	1
321097	SWAT	GPS GARDAM	Beha					1	1
321098	SWAT	GPS GOLDEN	Deolai					1	1
321099	SWAT	GPS JALOO	AKMB					1	1
321100	SWAT	GPS JANIMAR	Tirat					2	2
321101	SWAT	GPS KABAL KOO	Gwaleari					2	2
321102	SWAT	GPS KALAM OLD	Kalam					2	2
321103	SWAT	GPS KANATAI	Gwaleari					1	1
321104	SWAT	GPS KANJU NO.2	Kanju					1	1
321105	SWAT	GPS KIDAM	Balakot					1	1
321106	SWAT	GPS KOZ BARGIN	Shin					2	2
321107	SWAT	GPS MAHAK	Kalakalay					1	1
321108	SWAT	GPS MANDAN	AKMB					2	2
321109	SWAT	GPS MANGLOR NO.2	AKMB					1	1
321110	SWAT	GPS MIANDAM	Miandam					1	1
321111	SWAT	GPS NAZAR ABAD	Arkot					1	1
321112	SWAT	GPS PINDA SHAH PATAY	Koz Aba Khel					2	2
321113	SWAT	GPS QANDIL	Qandail					1	1
321114	SWAT	GPS RADOKRAI	Barthna					1	1
321115	SWAT	GPS SAMBAT	Baidara					1	1
321116	SWAT	GPS SAMBAT CHAM	Baidara					1	1
321117	SWAT	GPS SHAHEED BABA NO.2	Kanju					1	1
321118	SWAT	GPS SHAKAR DARA	Pir Kalay					1	1
321119	SWAT	GPS SHALKYAR	Bashigram					1	1
321120	SWAT	GPS SHER PALAM NO.2	Pir Kalay					1	1
321121	SWAT	GPS SHORSHAHI	Shawar					2	2
321122	SWAT	GPS SUBANR	Arkot					1	1
321123	SWAT	GPS SIRSENAI NO.2	Bar Aba Khel					1	1
321124	SWAT	GPS TALIGRAM	Taligram R/S-18					1	1
321125	SWAT	GPS TALINGA	Tirat					2	2
321126	SWAT	GPS TANGBANR	Pir Kalay					1	1
321127	SWAT	GPS TANGO	Shalpin R/S-22					1	1
321128	SWAT	GPS ZIARAT SWEGALAI	Koz Aba Khel					1	1
321129	SWAT	GPS ZWALA	Jano/Chamtalai					1	1
321130	SWAT	GPS JAGAH	Behrain					1	1
321131	SWAT	GPS.TOTANO BANDAI	Totano Bandal					1	1



National Testing Service Pakistan

Annex-C

ROLL NO SLIP

Elementary and Secondary Education Department, Government of
Khyber Pakhtunkhwa

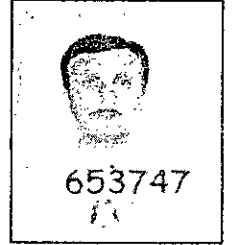
Roll No. 3250605

CNIC No. 15602-0279603-9

Dear ASHRAF ALI

Father Name: AHMAD KHAN

Post: Theology Teacher(TT) (BPS-15) PaperType: E



Test Day & Date

Sunday, 23rd February, 2014

Assalam O Alaikum!

You are required to appear for the above mentioned program at the center given below:

**Working Folks Grammar Higher Secondary School Labour colony
panr mingora, Swat**

Note: You are provisionally allowed to appear in the test. Subject to verification of credentials and eligibility criteria as per Education Department The Government of Khyber Pakhtunkhwa

Note:

- Reporting time for test is **10:30 AM.** Attendance will start at **11:00 AM sharp.**
- You are required to bring this **ROLL NO SLIP** along with your original **National Identity Card/Matric Certificate** containing your photograph. Candidates failing to produce **Roll No. Slip and Original CNIC** would not be allowed to enter the examination hall.
- You are also required to bring a clipboard and ball pen (black or blue) with you.
- Mobile phones/Calculators or any other electronic device is not allowed.
- Keep visiting NTS website **www.nts.org.pk** for further information and test result.

MOBILE PHONE IS NOT ALLOWED INSIDE TEST CENTER PREMISES (PLEASE DON'T BRING MOBILE PHONE)

ٹیٹس سنٹر کی حدود میں موبائل لانا سختی سے منع ہے
انتباہ: موبائل اور الیکٹرانک آلات کے لیے آپ کی جامع تلاش لی جاسکتی ہے۔
اور برآمد ہونے کی صورت میں ضبط کر کے پیپر Cancel کر دیا جائے گا۔

Manager Operations

To, TCS NO :



3250605
ASHRAF ALI
MOHALLA MIR AHMAD KHEL VILLAGE AND POST
OFFICE GHALEGAY TEHSIL BARIKOT, SWAT
DISTRICT: Swat
03453505657, 0946751424

Postage Prepaid

From:
National Testing Service
Plot # 96, St # 4
Sector H-8/1 Islamabad

پوسٹ میں نوٹ:- برائے مہربانی اسے 15th February 2014 تاریخ سے پہلے پہنچائیں۔ وگرنہ NTS کو فوری واپس بھیجوائیں۔



1

Annex-D

**OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
Swat (Cell # 0946 9240209-228)**

APPOINTMENT

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the vacant TT posts on one year Ad hoc School based policy in BPS: 15 (Rs.8500-700-29500) fixed plus usual allowances as admissible under the Rules and existing policy of the Provincial Government, in Teaching Cadre on the terms & conditions given below with effect from the date of their taking over charge.

S. #	Name of candidate	Father's Name	D/O Birth	Score	Remarks
1.	Mr. Afzal Shah	Mian Badshah	04.4.1983	132.44	GHS: Sherpalam
2.	Mr. Ataullah	Fazal Hakeem	08.01.1987	131.8	GHS: Manyar
3.	Mr. Ubaid Ullah	Ismail	01.11.1991	131.25	GHS: Brawal
4.	Mr. Habib un Nabi	Ghulam Nabi	01.04.1983	131.09	GMS: Galoch
5.	Mr. Ihsanullah	Shah Dad	05.05.1986	130.72	GHSS: Kishawra
6.	Mr. Umar Khitab	Haji Umar Farakh	10.04.1983	130.26	GHS: Gurnai
7.	Mr. Saif Ullah	Adil Muhammad Khan	13.10.1984	129.72	GHS: Bandai
8.	Mr. Amin ul Haq	Salamul Haq	02.01.1975	128.39	GMS: Ayeen
9.	Mr. Gohar Ali	Sardar Ali	01.04.1982	127.34	GHS: Jambli
10.	Mr. Naeem Ullah	Rahim Shah	10.03.1981	127.01	GMS: Garajir
11.	Mr. Wazir Zada	Musafar	15.09.1980	125.59	GMS: Azad Banda
12.	Mr. Muhammad Ishaq	Azim Khan	23.03.1986	125.3	GHS: Gogdara
13.	Mr. Muhammad Alam	Aziz ur Rahman	03.04.1981	125.17	GMS: Anakar
14.	Mr. Shahi Nawab	Shahi Taj Bacha	05.11.1983	124.9	GHS: Parrai
15.	Mr. Fazal Wadood	Musafar	01.01.1985	124.77	GMS Damana
16.	Mr. Imtiaz Ahmad	Abdul Hassan	01.04.1976	124.59	GHS: Chail
17.	Mr. Abdur Rahman	Mohib ul Haq	15.05.1981	124.43	GHSS: Shamozi
18.	Mr. Rahmat Ali	Tasir Jan	01.01.1987	124.39	GMS: Goda
19.	Mr. Muhammad Ayaz	Sher Zada	05.03.1977	124.37	GHSS: Kedam
20.	Mr. Liaqat Ali	Muhammad Ghawri	16.02.1988	124.37	GHSS: Mankeyal
21.	Mr. Habib Ullah	Usman Ghani	21.04.1988	124.36	GMS: Ghakhi Banda

22	Mr. Inayatullah	Muhammad Dawran	25.04.1987	124.11	GHS: Pishmal
23.	Mr. Nadar Khan	Amir Zada	10.05.1981	123.7	GHS: Ashoran
24.	Mr. Amin ul Haq	Aziz ur Rahman	01.04.1978	123.0	GHS: Banjoot
25.	Mr. Abdul Salam	Abdul Wahab	10.05.1984	122.54	GMS: Gabral
26.	Mr. Imtiaz Ali	Haji Muhammad Ali	23.07.1991	121.97	GMS: Beshigram
27	Mr. Atta ur Rahman	Shams ur Rahman	04.04.1977	121.85	GHS: Shah Derai
28.	Mr. Nasar Ali	Saleh Gul	01.12.1982	121.55	GHS: Bahrain
29.	Mr. Bakhte Rahman	Bakht Mashal	10.12.1979	121.41	GHS: Bar Bargin
30.	Mr. Akbar Hussain	Amir Zada	10.05.1988	121.33	GHS: Kalam
31.	Mr. Khurshid Iqbal	Abdul Jabbar	24.04.1979	121.26	GHS: Deolai
32.	Mr. Ashraf Ali	Ahmad Khan	10.11.1979	121.06	GHS: Khazana
33	Mr. Shamsul Iqbal	Ali Shah	05.02.1989	120.82	GHS: Shalpin
34	Mr. Aqal Zada	Manasab Khan	16.08.1988	120.76	GHS: Gat
35	Mr. Bahadar Shir	Muhammad Afzal	04.02.1978	120.12	GHS: KhwazaKhela
36	Mr. Shahid Hussain	Wali Ahad	20.03.1987	119.48	GMS: Cham Derai
37	Mr. Hassan Ahmad	Muhammad Amin Badshah	01.03.1984	112.43	GMS: Bafar

Terms & Conditions

1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned.
3. Appointment is purely on temporary & ad hoc basis for one year with effect from 27.10.2014 to 26.10.2015.
4. He should not be handed over charge if he exceeds 38 (Thirty Eight) years or below 18 years of age.
5. Appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities, anyone found producing bogus certificate will be reported to the Law enforcing agencies for further action.
6. His services are liable to termination on one month's prior notice from either side. In case of resignation without notice his one month pay /allowances shall be forfeited to the Government.
7. Pay shall not be drawn until and unless a certificate issued by this office that his documents are verified.
8. He should join his post within 30 days of the issuance of this notification. In case of failure to join the post within 30 days of the issuance of this Notification his appointment shall stand expired automatically and no subsequent appeal etc. shall be entertained.
9. Health & Age Certificate should be produced from the Medical Superintendent before taking over charge.
10. He will be governed by such Rules and Regulation as may be issued from time to time by the Government.

11. His services shall be terminated at any time in case his performance is found unsatisfactory during his service period. In case of misconduct, he shall be proceeded under the relevant rules & regulations announced from time to time.
12. His appointment is Ad hoc and school based. He shall have to serve at the place of posting and his service is not transferable to any other station.
13. Before handing over charge his documents may be checked and if found bogus or irrelevant as per qualification and rules charge of the post may not handed over.

(Prof. MUHAMMAD UZAIR ALI)
DISTRICT EDUCATION OFFICER
SWAT GUL KADA

Endst No: 3718-25 /TT/ Appointment/Ad hoc/NTS dated: 27-10-2014.

Copy of the above is forwarded for information & necessary action to: -

1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. The District Comptroller of Accounts Swat.
3. The Principal/Headmaster concerned.
4. The Deputy DEO Male Local Office.
5. The B&AO Local Office.
6. The Supdt Secondary Local Office.
7. The Candidates concerned.
8. PA to DEO Local Office.


DISTRICT EDUCATION OFFICER
(MALE) SWAT GUL KADA

TIPONMEN NIS 2014 SWAT

46

BEFORE THE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL PESHAWAR
SERVICE APPEAL NO 209/15

Fazal Rahman TT (BPS-15) GHS Khazana District SWAT.

Appellant

VERSUS

Secretary Elementary & Secondary Education KP & others

Respondents

JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENT NO 1 TO 3

RESPECT FULLY SHEWETH

Preliminary Objections

- 1- The appellant has no locus standi /no cause of actions to file the instant appeal against the respondents.
- 2- The instant appeal is not maintainable in the present form.
- 3-That the instant appeal is time-barred.

FACTUAL OBJECTIONS

- 1- That Para No 1 is related to the service record of the appellant therefore needs no comments.
- 2- That Para No 2 is related to the service tenure & residential status of the appellant hence needs no comments.
- 3- That Para No 3 is related to the physical fitness & seniority of the appellant, Hence needs no comments.
- 4- That Para No 4 is correct to the extent of advertisement. The respondent No3 advertised some posts of TT on one year ad hoc school based appointments policy through NTS.

The TT post of GHS Khazana was allocated to the NTS as per policy of GOVT of Khyber Pakhtunkhwa under school code No 321015. Advertisement & list of schools is attached as Annexure A & B.

- 5- That the appellant was transferred to GHS Qalagay vide order Endst No 1709-29/TT dated 4/10/2014 due to the allocation of TT post of GHS Khazana to the NTS for Appointment on one year Ad Hoc & school based policy of GOVT of Khyber Pakhtunkhwa. The list of schools & Advertisement is already appended as Annexure A & B.
- 6- That the appellant departmental appeal was not considered due to the allocation of the TT post of GHS Khazana to the NTS as per policy of GOVT.
- 7- That the respondent No 4 Mr.Ashraf Ali S/O Ahmad Khan was appointed as TT against the vacant post through NTS on merit at S/No 32 after due process vide Endst No 3718-25/TT/Appointment/Ad Hoc/NTS Dated 27/10/2014. Copy of transfer and Appointment orders is attached as Annexure C & D.
- 8- That the appellant was transferred from GPS Qalagay to GHS Kabal against the vacant post because GHS Kabal is near to the Residence of the Appellant than GHS Qalagay.
The Appellant was facilitated through office corrigendum Dated 1/11/2014. Copy of corrigendum is attached as Annexure. "B"
- 9- That the transfer appointment orders of respondent No 3 Dated 4/10/2014, 27/10/2014 & 1/11/2014 are legal, Constitutional & according to the rules & policies of GOVT of Khyber Pakhtunkhwa .

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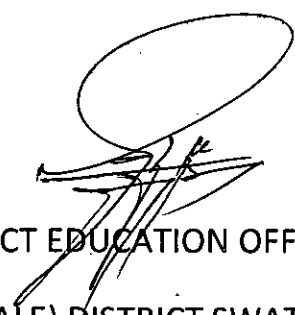
GROUNDS

- 1- That the Transfer/Appointment orders of respondent No 3 Dated 4/10/2014, 27/10/2014 & 1/11/2014 are legal, constitutional & according to the rules & policies of GOVT of Khyber Pakhtunkhwa as already clarified in Paras No 4, 5, 6, 7 & 8 in factual objections.
- 2- According to GOVT Policy of Ad Hoc School-based Appointments, The post of TT has been allocated to NTS as already clarified in Para No 4 of factual objections.
- 3- This Para is related to Physical Health & Fitness of the Appellant, Hence needs no comments.
- 4- That while issuing the orders Dated 4/10/2014, 27/10/2014 & 1/11/2014, The Rationalization Policy & Rules has not been violated.
- 5- The TT Post of GHS Khazana was allocated to NTS based Appointments by the deptt, which was given on NTS Website for Public Advertisement No Prior notice is required before transfer under the prevailing rules.
- 6- That the orders are not favorable to everyone at the lost of the Appellant. The respondents did the Appointment of respondent No 4 after the fulfillment of due Process & Merit as already clarified in Para No 7 of factual objections.
- 7- The Para is related to the service record of the Appellant, Hence needs no comments.
- 8- The Appellant cannot be clarified at GHS Khazana as TT because the TT Post has been allocated to the NTS for One Year Ad Hoc School based Appointment as Per Policy of the GOVT of Khyber Pakhtunkhwa.

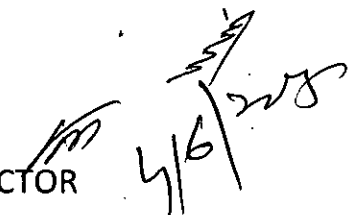
That the respondents also seek permission to raise additional grounds and proofs at the time of arguments before the honorable service tribunal.

(3)

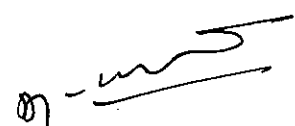
In view of the above facts and circumstances, this Honorable Tribunal may very graciously be pleased to dismiss the present appeal with cost in favor of Respondents.



DISTRICT EDUCATION OFFICER
(MALE) DISTRICT SWAT



DIRECTOR
(E&SE) KHYBER PAKHTUNKHWA
AT PESHAWAR



SECRETARY
(E&SE) KHYBER PAKHTUNKHWA
AT PESHAWAR

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL No. 209/15

FAZAL RAHMAN TT GHS KHAZANA SWAT

.....APPELLANT

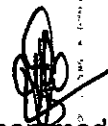
VERSUS

THE SECRETARY ELEMENTRY AND SECONDARY EDUCATION PESHAWAR AND OTHERS.

.....RESPONDENTS

AFFIDAVIT

I Muhammad Uzair Ali DEO (M) Swat do here by solemnly affirm and declare that the contents of the comments are true and correct to the best of my knowledge and belief and nothing has been kept secret from this august court .



(Prof: Muhammad Uzair Ali)
District Education Officer (M)
District Swat

(5)

List of Schools

SWAT
MALE

23

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Annex-B

Roll No	District	School Name	UO	PT	PM	PE	AD	ST	GR	RA	Total Vacancies
321001	SWAT	GHS ASHORAN		1		1	1	1	1		5
321002	SWAT	GHS BAHRAIN		2				1			3
321003	SWAT	GHS BANDAI						1			1
321004	SWAT	GHS BANJOOT						1			1
321005	SWAT	GHS BRAWAL						1			1
321006	SWAT	GHS CHAIL		1		1	1				3
321007	SWAT	GHS DEOLAI						1			1
321008	SWAT	GHS GALOCH						1			1
321009	SWAT	GHS GALOUCH					1				1
321010	SWAT	GHS GAT					1	1			2
321011	SWAT	GHS GOGDARA						1			1
321012	SWAT	GHS GURNAI		1	1	1	1	1			4
321013	SWAT	GHS JAMBIL						1	1		2
321014	SWAT	GHS KEDAM							1		1
321015	SWAT	GHS KHAZANA						1			1
321016	SWAT	GHS KIDAM		1				1			2
321017	SWAT	GHS KIDAM SWAT					1				1
321018	SWAT	GHS KOTLAI							1		1
321019	SWAT	GHS MANAI					1				1
321020	SWAT	GHS MANYAR						1	1		2
321021	SWAT	GHS MATILTAN							1		1
321022	SWAT	GHS MATTA							1		1
321023	SWAT	GHS PARRAI						1			1
321024	SWAT	GHS PISHMAL						2			2
321025	SWAT	GHS QALAGAY							1		1
321026	SWAT	GHS QANDIL					1				1
321027	SWAT	GHS SHAH DHERAI							2		2
321028	SWAT	GHS SHALHAND					1				1
321029	SWAT	GHS SHALPIN						2			2
321030	SWAT	GHS SHAWAR							1		1
321031	SWAT	GHS SIHERPALAM						1	1		2
321032	SWAT	GHS SUBANR					1				1
321033	SWAT	GHS TOPSIN					1				1
321034	SWAT	GHS UTROR			1						1
321035	SWAT	GHSS KALAM						1	1		2
321036	SWAT	GHSS KHAWAZA KHELA						1			1
321037	SWAT	GHSS KISHAWRA						1			1
321038	SWAT	GHSS KISHWARA					1				1
321039	SWAT	GHSS MANKEYAL						2	1		3
321040	SWAT	GHSS MANKYAI			1						1
321041	SWAT	GHSS SHAMOZI					1	1			2
321042	SWAT	GMPS JAWARO BIA' AND	Arkot							1	1
321043	SWAT	GMS ALIGRAMA					1				1
321044	SWAT	GMS ANAKAR		1	1			1			3
321045	SWAT	GMS ANAKER					1				1
321046	SWAT	GMS AREEN		2							2
321047	SWAT	GMS ASHAR BANR					1				1
321048	SWAT	GMS AYEEN		2				1			3
321049	SWAT	GMS AZAD BANDA						1			1
321050	SWAT	GMS AZADA BANDA		1							1
321051	SWAT	GMS BAFAR						1			1
321052	SWAT	GMS RAR BARGIN					1				1
321053	SWAT	GMS BARGIN						1			1
321054	SWAT	GMS BAYUN		1	1						2
321055	SWAT	GMS BEHAR		1			1				2
321056	SWAT	GMS BESHIGRAM						1			1
321057	SWAT	GMS CIAM GARAI						1			1
321058	SWAT	GMS CIAMGARAI					1				1
321059	SWAT	GMS CIARMA		1			1				2
321060	SWAT	GMS CHINKOLAI					1				1
321061	SWAT	GMS DABERGAI				1					1
321062	SWAT	GMS DAD					1				1
321063	SWAT	GMS DAKORAK					1				1
321064	SWAT	GMS DAMANA					1	1			2
321065	SWAT	GMS FAZAL BANDA		1							1
321066	SWAT	GMS GABRAL					1	1			2
321067	SWAT	GMS GANAJIR						1			1

T.C.
5/11/2019

Annex-B

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321068	SI	GMS GHAKHI BANDA						1		1
321069	SWAT	GMS GODA						1		1
321070	SWAT	GMS KALAGAY				1				1
321071	SWAT	GMS KOTA					1			1
321072	SWAT	GMS LAKHAR					1			1
321073	SWAT	GMS LALKOD			1					1
321074	SWAT	GMS TIRAT					1			1
321075	SWAT	GPS ALLAABAD	Gulibagh						1	1
321076	SWAT	GPS AMLOOK DARA	Ghalegay						1	1
321077	SWAT	GPS AWAR PATAY	Kalikalay						1	1
321078	SWAT	GPS AWESHAH	chuprial						1	1
321079	SWAT	GPS BAH DAR BANDA	Koza Bandal						1	1
321080	SWAT	GPS BALALAI	Gulibagh						1	1
321081	SWAT	GPS BARA DURESHKHELA	Dureshkhela						1	1
321082	SWAT	GPS DEIRAIN	Behrain						1	1
321083	SWAT	GPS BELA BATAKA	Shah Dehral						2	2
321084	SWAT	GPS BODAY GHAR	AKMB						2	2
321085	SWAT	GPS BODIGRAM	Baldara						1	1
321086	SWAT	GPS CHARDAGH	Charbagh						1	1
321087	SWAT	GPS CHARMA	Gwalearl						1	1
321088	SWAT	GPS CHATIKAL	Beha						1	1
321089	SWAT	GPS CHINDA KHWARA	Bar Aba Khel						1	1
321090	SWAT	GPS DARA DABARGAY	Bashlgram						2	2
321091	SWAT	GPS DARA PARAI	Barikot						1	1
321092	SWAT	GPS DARDYAL	Tall						1	1
321093	SWAT	GPS DEDAWAR	Shamozai						1	1
321094	SWAT	GPS DITPANAI	Matta/Khareral						1	1
321095	SWAT	GPS FAZAL ABAD DEOLAI	Deolai						1	1
321096	SWAT	GPS GANORAI	Kokaral						1	1
321097	SWAT	GPS GARDAM	Beha						1	1
321098	SWAT	GPS GOLDEN	Deolai						1	1
321099	SWAT	GPS JALOO	AKMB						1	1
321100	SWAT	GPS JANIMAR	Tirat						2	2
321101	SWAT	GPS KABAL KOO	Gwalearl						2	2
321102	SWAT	GPS KALAM OLD	Kalam						2	2
321103	SWAT	GPS KANATAI	Gwalearl						1	1
321104	SWAT	GPS KANJU NO.2	Kanju						1	1
321105	SWAT	GPS KIDAM	Balakot						1	1
321106	SWAT	GPS KOZ BARGIN	Shln						2	2
321107	SWAT	GPS MAHAK	Kalikalay						1	1
321108	SWAT	GPS MANDAN	AKMB						2	2
321109	SWAT	GPS MANGLOR NO.2	AKMB						1	1
321110	SWAT	GPS MIANDAM	Mlandam						1	1
321111	SWAT	GPS NAZAR ABAD	Arkot						1	1
321112	SWAT	GPS PINDA SHAH PATAY	Koz Aba Khel						2	2
321113	SWAT	GPS QANDIL	Qandall						1	1
321114	SWAT	GPS RADOKRAI	Barthna						1	1
321115	SWAT	GPS SAMBAT	Baldara						1	1
321116	SWAT	GPS SAMBAT CIHAM	Baldara						1	1
321117	SWAT	GPS SHAHEED BABA NO.2	Kanju						1	1
321118	SWAT	GPS SHAKAR DARA	Pir Kalay						1	1
321119	SWAT	GPS SHALKYAR	Bashlgram						1	1
321120	SWAT	GPS SHER PALAM NO.2	Pir Kalay						1	1
321121	SWAT	GPS SHORSHAIHI	Shawar						2	2
321122	SWAT	GPS SUBANR	Arkot						1	1
321123	SWAT	GPS SIRSENAI NO.2	Bar Aba Khel						1	1
321124	SWAT	GPS TALIGRAM	Tallgram R/S-18						1	1
321125	SWAT	GPS TALINGA	Tirat						2	2
321126	SWAT	GPS TANGBANR	Pir Kalay						1	1
321127	SWAT	GPS TANGO	Shalpin R/S-22						1	1
321128	SWAT	GPS ZIARAT SWEGALAI	Koz Aba Khel						1	1
321129	SWAT	GPS ZWALA	Jarro/Chamtalal						1	1
321130	SWAT	GPS JAGARI	Behrain						1	1
321131	SWAT	GPS.TOTANO BANDAI	Totano Bandal						1	1

T.C.
5/11/2014

Annex
(25)

25 (9)

OFFICE OF THE DISTRICT EDUCATION OFFICER MALE DISTRICT SWAT

Annex C

OFFICE ORDER

Consequent upon the post of TT of the following schools advertised through NTS. The DEO (M) Swat has been pleased to transfer/adjust the TT of the following schools on their own pay and scale at the schools noted against each TT post in the interest of Public service with immediate effect.

S.No.	Name	From	To	Remarks
01	Hazrat Hussain TT	GHS Ashoran	GMS Jalbanr	Against Vacant Post
02	Izharul Haq TT	GHS Chail	GMS Torwal	-do-
03	Altaullah S.TT	GHS Deolai	GHS Shalhand	-do-
04	Noorul Wahab TT	GHS Galoch	GHS Kabal	-do-
05	Abdul Salam TT	GHS Gogdara	GHS Kanju	-do-
06	Fazal Rahman TT	GHS Khazana	GHS Qalagay	-do-
07	Rashid Ahmad STT	GHS Manyar	GHS Dehrai	-do-
08	Rashid Ahmad STT	GHS Parrai	GHS Dardyal	-do-
09	Fazal Rahman TT	GHS Shahdehrai	GMS Deolai	-do-
10	Abdul Wasi TT	GHS Shalpin	GMS Behar	-do-
11	Ali Rahman TT	GHS Kishawra	GMS Bishbanr	-do-
12	Habibur Rahman TT	GMS Bashigram	GHS Rahat Kot	-do-
13	Asfandyar TT	GMS Azad Banda	GMS Areen	-do-
14	Nowsherawan TT	GMS Damaha	GMS Jarry	-do-
15	Rashid Ahmad TT	GMS Chanigharai	GMS Malragal	-do-
16	Muhammad Tliullah TT	GHS Khwaza Khela	GMS Dad K.Khela	-do-
17	Gul Shah zada TT	GHS Shamozai	GMS Taran	-do-
18	Sayed Muhammad Shah TT	GHS Sherpalam	GHS Sijbanr	-do-

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

(MUHAMMAD UZAIR ALI)
DISTRICT EDUCATION OFFICER
MALE SWAT.
Dated: 04-10-2014

T.C.
5/10/2014

Encls: No. 1709-29/TT

Copy to:-

01. The Director (E & S) Education KPK Peshawar.
02. The District Accounts Officer Swat.
03. The Principal/Head Master Concerned.
04. The Teacher Concerned.
05. PA to DEO (M) Swat.

DISTRICT EDUCATION OFFICER
MALE SWAT.

4/10/14

Annex-C

Shahid Ali
21-01-2015

(Better Copy)

page (26-A)

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To,

The District Education Officer (M)
Swat saidu Sharif at Gul kada.

D/Appeal
11/10/2014

Subject: **APPEAL FOR CANCELLATION OF TRANSFER ORDER**

Respected Sir,

I have the honor to say and submit a few lines for your favour consideration and farther necessary action please,

That I am working against T.T Post at GHS KHAZANA District Swat and have been transferred to GHS Qalaga

Swat vide your office order NO. 1709-29-TT

Dated 04-10-2014/ I am serving from as T.T. 20-11-1984 in this school and I am the permanent resident of Union Council (Shamozai) Garhi and no other person of this area working as T.T out form U/C Shamozai other than I am old man and have 56 years of age in this age it is very difficult to perform my duty in far flung areas only three years remaining in my supernuation therefore requested in your kind control to cancel my transfer order I shall be very thankful to you.

Yours obediently
Fazal Rahman
Post T.T GHS Khazana
Distt: Swat

No ---669---/Dated---11-10-2014

Forward to the District Education Officer (M) Swat with the remarks that the appeal/ Application is based on facts and other than Mr.Fazal Rahman T.T of this School and old age person. He is 56(fifty six) years old and also a patient therefore requesting to cancel his transfer Order.

The application is forwarded
For necessary action please,

Head Master,
Govt High School,
Khazana, District Swat.



**OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
Swat (Cell # 0946 9240209-228)**

Annex-D

APPOINTMENT

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the vacant TT posts on one year Ad hoc School based policy in BPS: 15 (Rs.8500-700-29500) fixed plus usual allowances as admissible under the Rules and existing policy of the Provincial Government, in Teaching Cadre on the terms & conditions given below with effect from the date of their taking over charge.

S. #	Name of candidate	Father's Name	D/O Birth	Score	Remarks
1.	Mr. Afzal Shah	Mian Badshah	04.4.1983	132.44	GHS: Sherpalim
2.	Mr. Ataulah	Fazal Hakeem	08.01.1987	131.8	GHS: Manjar
3.	Mr. Ubaid Ullah	Ismail	01.11.1991	131.25	GHS: Brawal
4.	Mr. Habib un Nabi	Ghulam Nabi	01.04.1983	131.09	GMS: Galoch
5.	Mr. Ihsanullah	Shah Dad	05.05.1986	130.72	GHSS: Kishawra
6.	Mr. Umar Khitab	Haji Umar Faruk	10.04.1983	130.26	GHS: Gurnal
7.	Mr. Saif Ullah	Adil Muhammad Khan	13.10.1984	129.72	GHS: Bandal
8.	Mr. Amin ul Haq	Salamu Haq	02.01.1975	128.39	GMS: Ayeen
9.	Mr. Gohar Ali	Sardar Ali	01.04.1982	127.34	GHS: Jambil
10.	Mr. Naeem Ullah	Rahim Shah	10.03.1981	127.01	GMS: Ganajir
11.	Mr. Wazir Zada	Musafar	15.09.1980	125.59	GMS: Azad Banda
12.	Mr. Muhammad Ishaq	Azlm Khan	23.03.1986	125.3	GHS: Gogdara
13.	Mr. Muhammad Alam	Aziz ur Rahman	03.04.1981	125.17	GMS: Anakar
14.	Mr. Shahi Nawab	Shahi Taj Bacha	05.11.1983	124.9	GHS: Parial
15.	Mr. Fazal Wadood	Musafar	01.01.1985	124.77	GMS Damana
16.	Mr. Imtiaz Ahmad	Abdul Hassan	01.04.1976	124.59	GHS: Chall
17.	Mr. Abdur Rahman	Mohib ul Haq	15.05.1981	124.43	GHSS: Shamozl
18.	Mr. Rahmat Ali	Tasir Jan	01.01.1987	124.39	GMS: Goda
19.	Mr. Muhammad Ayaz	Sher Zada	05.03.1977	124.37	GHSS: Kedam
20.	Mr. Liaqat Ali	Muhammad Ghawri	16.02.1988	124.37	GHSS: Wankeyal

Annex-D

(12)

22	Mr. Inayatullah	Muhammad Dawran	25.04.1987	124.11	GHS: Pishmal
23.	Mr. Nadar Khan	Amir Zada	10.05.1981	123.7	GHS: Ashoran
24.	Mr. Amin ul Haq	Aziz ur Rahman	01.04.1978	123.0	GHS: Bahjoot
25.	Mr. Abdul Salam	Abdul Wahab	10.05.1984	122.54	GMS: Gabral
26.	Mr. Imtiaz Ali	Haji Muhammad Ali	23.07.1991	121.97	GMS: Beshigram
27	Mr. Atta ur Rahman	Shams ur Rahman	04.04.1977	121.85	GHS: Shah Deral
28.	Mr. Nasar Ali	Saleh Gul	01.12.1982	121.55	GHS: Bahrain
29.	Mr. Bakhte Rahman	Bakht Mashal	10.12.1979	121.41	GHS: Bar Bargin
30.	Mr. Akbar Hussain	Amir Zada	10.05.1988	121.33	GHS: Rajam
31.	Mr. Khurshid Iqbal	Abdul Jabbar	24.04.1979	121.26	GHS: Deolai
32.	Mr. Ashraf Ali	Ahmad Khan	10.11.1979	121.05	GHS: Khazana
33	Mr. Shamsul Iqbal	Alli Shah	05.02.1989	120.82	GHS: Shalpin
34	Mr. Aqal Zada	Manasab Khan	15.08.1988	120.76	GHS: Gat
35	Mr. Bahadar Shir	Muhammad Afzal	04.02.1978	120.12	GHS: KhwazaKhela
36	Mr. Shahid Hussain	Walli Ahad	20.03.1987	119.48	GMS: Cham Deral
37	Mr. Hassan Ahmad	Muhammad Amin Badshah	01.03.1984	112.43	GMS: Bafar

Terms & Conditions

1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned.
3. Appointment is purely on temporary & ad hoc basis for one year with effect from 27.10.2014 to 26.10.2015.
4. He should not be handed over charge if he exceeds 38 (Thirty Eight) years or below 18 years of age.
5. Appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities, anyone found producing bogus certificate will be reported to the Law enforcing agencies for further action.
6. His services are liable to termination on one month's prior notice from either side. In case of resignation without notice his one month pay /allowances shall be forfeited to the Government.
7. Pay shall not be drawn until and unless a certificate issued by this office that his documents are verified.
8. He should join his post within 30 days of the issuance of this notification. In case of failure to join the post within 30 days of the issuance of this Notification his appointment shall stand expired automatically and no subsequent appeal etc. shall be entertained.
9. Health & Age Certificate should be produced from the Medical Superintendent before taking over charge.
10. He will be governed by such Rules and Regulation as may be issued from time to time by the Government.

(VIALE) 9-228)

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FAX NO. : 09469240329

28 Oct. 2014 2:57AM P3

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11. His services shall be terminated at any time in case his performance is found unsatisfactory during his service period. In case of misconduct, he shall be proceeded under the relevant rules & regulations announced from time to time.
12. His appointment is Ad hoc and school based. He shall have to serve at the place of posting and his service is not transferable to any other station.
13. Before handing over charge his documents may be checked and if found bogus or irrelevant as per qualification and rules charge of the post may not handed over.

(Prof. MUHAMMAD UZAIR ALI)
 DISTRICT EDUCATION OFFICER
 SWAT GUL KADA

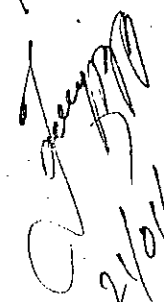
Endst No: 3718-25 /TT/ Appointment/Ad hoc/NTS dated: ~~1-2014~~ 27-10-2014

Copy of the above is forwarded for information & necessary action to: -

1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. The District Comptroller of Accounts Swat.
3. The Principal/Headmaster concerned.
4. The Deputy DEO Male Local Office.
5. The B&AO Local Office.
6. The Supdt Secondary Local Office.
7. The Candidates concerned.
8. PA to DEO Local Office.


 DISTRICT EDUCATION OFFICER
 (MALE) SWAT GUL KADA

T.T.P. ONTMENT (MS 2112) SWAT

T.C

 21/10/2014

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OFFICE OF THE
DISTRICT EDUCATION OFFICER
(MALE) SWAT

Annex - E

CORRIGENDUM:

Consequence upon the impartial modification in this office order No. 1709-29 04/10/2014. The following TT are hereby transfer to the school noted against each on their own pay and scale in the interest of public serves w.e.f the date of taking over charge.

S.No	Name and Designation	From	To	Remarks
1.	Noor Muhammad TT	GHS Banjot	GMS Aligrama	Against V/Post
2.	Nawsherwan TT GMS Damana	U/T to GMS Jarrai	GHS Rahat Kot	Against V/Post
3.	Asfandyar TT GMS Azad Banda	U/T to GMS Arcen	GMS Lalkoo	Against V/Post
4.	Habibur Rahman TT GMS Bashigram	U/T to GHS Rahat Kot	GMS Shinkoo	Against V/Post
5. ✓	Fazal Rahman TT GHS Khazana	U/T to GHS Qalagay	GHSS Kabal	Against V/Post
6.	Khan Muhammad TT	GMS Anakar	GHS Matiltan	Against V/Post
7.	Abdul Wasih TT GHS Shalpin	U/T to GMS Bihar	GMS Babo	Against V/Post
8.	Syed Manawar Shah TT GHS Sherpalam	U/T to GHS Sijbanr	GHSS Matla	Against V/Post

(Prof: Muhammad Uzair Ali)
DISTRICT EDUCATION OFFICER (M)
SWAT

Endst: No: 4848-55

Dated 1/11/2014.

Copy forwarded to:

1. The District Account Officer Swat.
2. The Head Master Concerned.
3. -10 The Teacher concerned.
11. P.A to the DEO (M) local office.

DISTRICT EDUCATION OFFICER (M)
SWAT

Annex - E

**BEFORE THE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL PESHAWAR CAMP COURT AT SWAT.**

Service appeal No 209/ 2015

Fazal Rehman TT (BPS-15) GHS Khazana District Swat.....Appellant

Versus

Secretary Elementary & Secondary Education KPK & others....Respondents.

**Rejoinder on behalf of appellant in response to
para wise comments filed by Respondents No 1 to 3.**

Respectfully Sheweth, The appellant submits as under;

Preliminary objections; That all the preliminary objections raised by respondents No 1 to 3 are illegal, against facts & devoid of all legal force, the preliminary objections No 1 to 4 are totally baseless.

Factual Objections

1. That para No 1 of the comments needs no reply.
2. That para No 2 of the comments needs no reply.
3. That para No 3 of the comments needs no reply, moreover some of the copies of medical treatment of appellant were produced & some are attached herewith.
4. That in response to para No 4 of the comments, it is explained that when the alleged advertisement was made, the appellant was already on service in pursuance of an order of appointment passed by the competent authority but the respondent in disregard of law and facts advertised the same post as vacant & in consequence thereof proceedings were illegally conducted by the answering respondents, while concealing the material facts regarding the

occupation of the same post by the appellant. The answering respondents have concealed the material facts from this Honorable Court/Tribunal & Comments of the Respondents are misleading one, therefore the reply to para No 4 of the appeal is devoid of all legal force, hence required to be ruled out of consideration.

5. That para No 5 of the comments is also incorrect and misleading one. The answering respondents have admitted the material facts regarding the appointment/ occupation of the appellant in service, the respondents have time & again twisted the facts by filing the misleading comments which are irrelevant against facts and thus the comments of the respondents No 1 to 3 lacks all sorts of veracity.
6. That Para No 6 of the comments is also against the facts as stated above. The service of the appellant was transferred in utter disregard of transfer & posting policy just to adjust the blue eyed of the answering respondents on the basis of political indulgence.
7. That in response to para No 7 it is explained that the answering respondents have admitted the material fact regarding the occupation/ appointment of appellant in service and tried to twist the fact by filing the misleading comments.
8. That para No 8 of the comments also indicates malafidy on the part of answering respondents that one of the impugned Order had been reviewed but the appellant is still suffering at the hands of respondents as stated above in para No 3 of the rejoinder and in appeal of appellant.
9. That para No 9 is against facts & law, the impugned Orders are against rules and posting & Transfer policy.

GROUND:

1. That para No 1 is incorrect hence denied.
2. That para No 2 is incorrect hence denied.
3. That para No 3 needs no reply.
4. That para No 2 is incorrect hence denied.
5. That para No 2 is incorrect hence denied.

(3)

6. That para No 2 is incorrect hence denied. The service of the appellant was transferred in utter disregard of transfer & posting policy just to adjust the blue eyed of the answering respondents on the basis of political indulgence.
7. That para No 3 needs no reply.
8. That para No 2 is incorrect hence denied. Detail is mentioned above. That other grounds shall be argued at the time of arguments with the permission of this Honorable Tribunal.

It is therefore most humbly prayed that on acceptance of this rejoinder the comments filed by the respondents No 1 to 3 being devoid of legal and factual force be ruled out of consideration.

Appellant
Through Counsel


TARIQ AZIZ ADVOCATE
HIGH COURT

Date; 04-011-2015.

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No. 122 ST

Dated 26 / 1 / 2016


To

The DEO (Male),
Swat at Saidu Sharif Swat.

Subject: - Judgement.

I am directed to forward herewith certified copy of Judgement dated 11.1.2016 passed by this Tribunal on subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.