

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

C.M. NO. \_\_\_\_\_/2023

IN

Service Appeal No.1635/2023

MUHAMMAD BILAL

V/S

EDUCATION DEPTT:

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<b>S. NO.</b>	<b>DOCUMENTS</b>	<b>ANNEXURE</b>	<b>PAGE</b>
1.	Memo of Application with affidavit	.....	1
2.	Copy of relevant documents	"A"	2-3

Dated 07.11.2023

APPLICANT/APPELLANT

Through:



**KAMRAN KHAN**  
Advocate High Court.

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

C.M. NO. \_\_\_\_\_/2023  
IN  
Service Appeal No.1635/2023

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 8896

Dated 7-11-23

MUHAMMAD BILAL

V/S

EDUCATION DEPTT:

**APPLICATION FOR PLACING ON FILE NECESSARY  
DOCUMENTS IN THE ABOVE TITLE SERVICE  
APPEAL**

Respectfully Sheweth:

1. That the above title service appeal is pending adjudication before this Honourable Tribunal which has been fixed for today i.e on 11.08.2023
2. That there are some necessary documents that needs to be place on file for the just and fair decision in the above titled service appeal. Copy of documents is attached as annexure "A").
3. That the document mentioned above are required to be place on file being necessary document for the just disposal of the captioned appeal.
4. That any other grounds and proof with regard to the additional documents would be raised at the time of argument with prior permission of this Honourable Tribunal.

***It is, therefore, most humbly prayed that on acceptance of this application on behalf of the appellant the additional documents may be placed on file, for just and proper decision of the above mentioned service appeal.***

Dated 07.11.2023

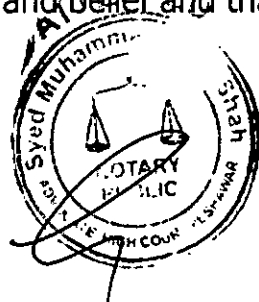
APPLICANT/APELLANT  
Muhammad Bilal

Through:

  
**KAMRAN KHAN**  
Advocate High Court.

**AFFIDAVIT**

I, **Muhammad Bilal** (the Applicant/Appellant) do hereby solemnly affirm and declare on Oath that the contents of this **Application** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.



**DEPONENT**



(2) "A"

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT**  
**Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar**  
**Phone No. 091-9210626**

Dated: 25<sup>th</sup> August, 2023

**NOTIFICATION**

**NO.SO(MC)E&SE/4-16/2023/Posting/Transfer/Arjumand/:** Consequent upon the acceptance of departmental appeal, the Notification dated 14.07.2023 regarding posting/transfer in respect of Mr. Arjumand Khan ASDEO (M) Circle Chaudwan D.I.Khan, appearing at Sr.No.2 issued by Director E&SE, is hereby withdrawn/cancelled.

**SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA**  
**E&SE DEPARTMENT**

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

**Copy forwarded for information to the: -**

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
4. District Education Officer (Male) D.I.Khan
5. District Accounts Officer D.I.Khan
6. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
7. Master file.

111/700  
25.8.2023  
**SECTION OFFICER (Management Cadre)**

*Attested*  
*[Signature]*



**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION**

**KHYBER PAKHTUNKHWA PESHAWAR.**

No. 11211 / F. No. 34/ADR/VA/T/Trans/Dr D.I. Khan  
Dated Peshawar the 02/08/2023  
Email: establishment@mcde1@gmail.com

Phone: 091-9225344

To

The Section Officer (Management Cadre),  
Elementary & Secondary Education Department,  
Govt. of Khyber Pakhtunkhwa Peshawar.

**Subject: - REPATRIATION APPEAL AGAINST POSTING TRANSFER ORDER  
DATED 14-07-2023**

Dear Sir,

I am directed to refer to the letter No. SO(MC/E&SE/14-16/2023/ Arjumand dated/2023 dated 21-07-2023 on the subject cited above and to state Mr. Arjumand SST was adjusted as ASDEO (M) Circle Chowdwan D.I. Khan on stop-gap arrangement vide order No. 3393-96 Dated: 13-05-2022. Honorable Advisor to Chief Minister for Elementary & Secondary Education Khyber Pakhtunkhwa submitted a proposal regarding adjustment of Mr. Muhammad Ehsan Khan SST as ASDEO (M) Circle Chowdwan & placing services of the incumbent at the disposal of DEO concerned.

This office honoured the order of the Advisor to Chief Minister for Elementary & Secondary Education vide order No.7156-60 dated 17-07-2023. The report is submitted for perusal & further necessary action please.

*[Signature]*  
Assistant Director (Estab: M-1)  
Elementary & Secondary Education.  
Khyber Pakhtunkhwa

O/C

Encls: No. \_\_\_\_\_  
Copy of the above is to:-

1. PA to Director Local Directorate.
2. Master File

*[Signature]*  
Assistant Director (Estab: M-1)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

O/C

*[Signature]*