

Sr.  
No

Date of  
order/  
proceedings

Order or other proceedings with signature of Judge or Magistrate

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR

Appeal No. 154/2016

Muhammad Tahir Versus Addl. Chief Secretary FATA, Peshawar  
and 5 others.

JUDGMENT

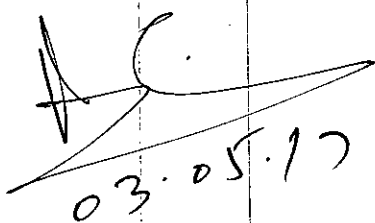
MUHAMMAD AZIM KHAN AFRIDI, CHAIRMAN:-

03.05.2017

Counsel for the appellant, Mr. Ziaullah, Government Pleader  
for official respondents and counsel for private respondent No. 4 & 5  
present.

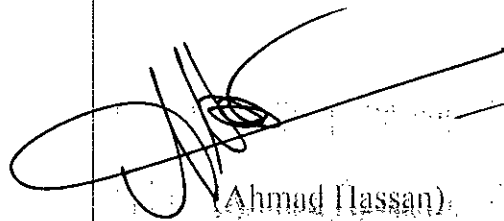
2. Muhammad Tahir Associate Professor (BPS-19) hereinafter  
referred to as the appellant has preferred the instant service appeal  
under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act,  
1974 against impugned order dated 20.10.2015 vide which he was  
transferred from Government Postgraduate College Khar to  
Government Degree College Borakholazai Bajaur Agency against the  
post of Principal BPS-18 and where-against his departmental appeal  
dated 28.10.2015 was not responded constraining him to prefer the  
instant service appeal on 17.02.2016.

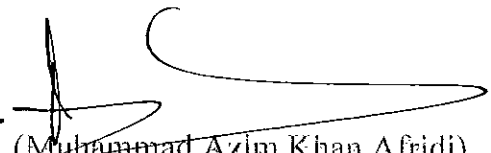
3. We have heard arguments of learned counsel for the appellant,  
learned Government Pleader for official respondents No. 1 to 3 and  
learned counsel for private respondents No. 4 and 5 and perused the  
record.

  
03.05.17

4. Pursuant to the said order appellant has relinquished the charge and is now serving against the post of Principal, Government Degree College, Borakholazai. We were informed that the appellant is going to retire on 31.07.2017 by attaining the age of superannuation. We were also informed that vacancy at Government Post-graduate College, Khar is available where-against appellant can be accommodated as Associate Professor (BPS-19).

5. In view of the above we suggest that the respondents may accommodate the appellant against any such vacancy keeping in view his retiring age. The appeal is disposed off accordingly. Parties are left to bear their own costs. File be consigned to the record room.

  
(Ahmad Hassan)  
Member

  
(Muhammad Azim Khan Afridi)  
Chairman  
03.05.17

ANNOUNCED  
03.05.2017

13.01.2017

Appellant with counsel, Mr. Muhammad Jan, GP for official respondents and clerk for private respondents No. 4 and 5 also present. Counsel for the appellant rejoinder which is placed on file. To come up for arguments on 10.04.2017.

  
(AHMAD HASSAN)  
MEMBER

  
(MUHAMMAD AMIR NAZIR)  
MEMBER

10.04.2017

Appellant along with his counsel present. Mr. Muhammad Adeel Butt, Additional AG for official respondents No. 1 to 4 also present. Counsel for private respondents No. 4 & 5 is not available. Last chance is given. To come up for arguments on 03.05.2017 before D.B.

  
(Ahmad Hassan)  
Member

  
(Muhammad Amin Khan Kundi)  
Member

13-1-17



13.06.2016

Counsel for the appellant, Mr. Murtaza Steno alongwith Addl. AG for the official respondents No. 1 to 3 & 6 and counsel for private respondents No. 4 & 5 present. Written reply by respondents No. 4 & 5 submitted. Last opportunity granted to official respondents. To come up for written reply/comments of official respondents No. 1 to 3 and 6 on 22.08.2016 before S.B.

  
Chairman

22.08.2016

Agent to counsel for the appellant, Mr. Murtaza, Stenographer alongwith Additional AG for official respondents No. 1 to 3 & 6 and agent to counsel for private respondents No. 4 & 5 present. Para-wise comments on behalf of official respondents No. 1, 2 & 6 submitted. The learned Additional AG relies on the para-wise comments submitted by 1, 2 & 6 on behalf of respondent 3. Private respondents No. 3 & 4 have already submitted their written reply. To come up for rejoinder and arguments on 03.11.2016 before D.B.

  
Chairman

03.11.2016

Appellant with counsel and Mr. Muhammad Jan, GP for official respondents No. 1 to 4 & 6 present. None present on behalf of private respondent No. 5 therefore, fresh notice be issued to him. To come up for rejoinder and arguments on 13-1-17 before D.B.

  
(ABDUL LATIF)  
MEMBER

  
(PIR BAKHSH SHAH)  
MEMBER

03.03.2016

Appellant with counsel present. Learned counsel for the appellant argued that the appellant was serving as Associate Professor in English at Government Post Graduate College Khar Bajaur Agency when transferred vide impugned order dated 20.10.2015 and posted as Principal at Government Degree College Barkhalozai Bajaur Agency where-against he preferred departmental appeal on 25.10.2015 which was not responded and hence the instant service appeal on 19.2.2016.

That the impugned order is against facts and law as the appellant is Associate Professor in English and his services were more required at Government Post Graduate College Khar Bajaur Agency while an Associate Professor in Political Science has been posted against the position of the appellant. That apart from the above, the appellant is having a sick mother direly in need of active care of the appellant and, furthermore, the appellant is near to his retirement as he is to superannuate on 30.10.2017.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 14.4.2016 before S.B. Notice of stay application be also issued for the date fixed.

Appellant Deposited  
Security & Process Fee

Chairman

14.4.2016




Appellant in person, Mr. Daud Jan, Supdt. alongwith Addl: A.G for official respondents and counsel for private respondents No. 4 & 5 present. Requested for adjournment. Last opportunity granted. To come up for written reply/comments on 13.06.2016 before S.B.

Chairman

Form- A  
FORM OF ORDER SHEET

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

Case No. 154 / 2016

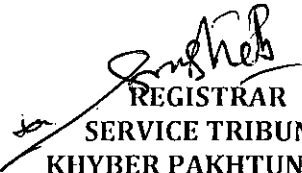
| S.No. | Date of order Proceedings | Order or other proceedings with signature of judge or Magistrate  |
|-------|---------------------------|---|
| 1     | 2                         | 3   |
| 1     | 19.02.2016                | <p>The appeal of Mr. Muhammad Tahir resubmitted today by Mr. Zahanat Ullah Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p><br/>REGISTRAR</p> |
| 2     | <u>22.2.16</u>            | <p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>24.2.16</u>.</p> <p><br/>CHAIRMAN</p>  |
|       | 24.02.2016                | <p>Appellant in person present. Seeks adjournment. Adjourned for preliminary hearing to 3.3.2016 before S.B.</p> <p><br/>Member</p>  |

The appeal of Mr. Muhammad Tahir son of Feroz Bakht Principal Govt. Degree College Barkhalozai Bajaur Agency received to-day i.e. on 17.02.2016 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Addresses of respondent No. 3 & 5 are incomplete which may be completed according to Khyber Pakhtunkhwa Service Tribunal rules 1974.

No. 262 /S.T,

Dt. 18/2 /2016

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Zahanatullah Adv. Pesh.

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

Service Appeal No. 154 /2016

Muhammad Tahir .....(Appellant)

**VERSUS**

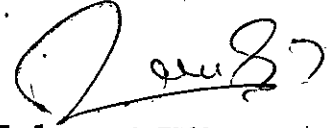
Additional Chief Secretary FATA, FATA Secretariat Warsak  
Road, Peshawar and others.....(Respondents)

**I N D E X**

| <b>S.No</b> | <b>Description of Documents</b> | <b>Annex</b> | <b>Pages</b> |
|-------------|---------------------------------|--------------|--------------|
| 1.          | Service Appeal                  |              | 1-5          |
| 2.          | Affidavit                       |              | 6            |
| 3.          | Addresses of the parties        |              | 7            |
| 4.          | Application                     |              | 8-10         |
| 5.          | Affidavit                       |              | 11           |
| 6.          | Copy of impugned notification   | A            | 12           |
| 7.          | Copy of departmental appeal     | B            | 13-15        |
| 8.          | Copy of complaint               | C            | 16-17        |
| 9.          | Copy of medical prescriptions   | D            | 18-31        |
| 10.         | Copy of Work Load Date          | E            | 32           |
| 11.         | Wakalat Nama                    |              | 33           |

  
Appellant

Through

  
**Zahanat Ullah**  
Advocate High Court,  
Peshawar.  
Cell No. 0345-9402120

Dated: 17/02/2016



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

Service Appeal No. 154 /2016

**N.W.F. Province  
Service Tribunal  
Diary No. 113  
Dated 17-2-2016**

Muhammad Tahir S/o Feroz Bakht R/o Degree College P.O  
Khar Tehsil Khar District Bajaur Agency.....(Appellant)

**VERSUS**

1. Additional Chief Secretary FATA, FATA Secretariat Warsak Road, Peshawar.
2. Director Education FATA, FATA Secretariat, Warsak Road, Peshawar.
3. Section Officer Establishment, FATA Secretariat, Warsak Road, Peshawar.
4. Principal Post Graduate College Khar Bajaur Agency.
5. Gul Haider Associate Professor in Political Science, Post Graduate College Khar Bajaur Agency.
6. Secretary Social Sector Department, FATA, FATA Secretariat Warsak Road, Peshawar.....(Respondents)

**APPEAL U/S 4 OF THE N.W.F.P (KHYBER PAKHTUNKHWA) SERVICE TRIBUNAL ACT 1974.**

**AGAINST THE ORDER /NOTIFICATION NO. FS/E/100-96 (VO-9) 14538-46 DATED 20/10/2015 VIDE WHICH THE RESPONDENT NO. 1 HAS TRANSFERRED THE APPELLANT FROM GOVERNMENT POST GRADUATE COLLEGE KHAR BAJAUR AGENCY TO GOVERNMENT DEGREE COLLEGE BARKHALOZAI, BAJAUR AGENCY, WHICH IS**

~~Filed to day~~

~~Registrar~~

~~17/2/14~~

re-submitted to day and filed.

~~Registrar~~

~~19/2/16~~

**AGAINST THE LAW AND RULES AND BASED  
ON PERSONAL GRUDGES, THUS LIABLE TO  
BE CANCELLED.**

**Respectfully Sheweth:**

**FACTS:**

1. That the appellant was appointed on 17/10/1981 as Lecturer (English) in BPS-17.
2. That the appellant is performing his duties with due responsibility zeal and satisfaction till date.
3. That on dated 20/10/2015 the respondent No. 2 upon the verbal request of respondent No 4 issued impugned transfer order vide which the appellant was transferred from Government College Khar Bajaur Agency to Government Degree College Borakholazai Bajaur Agency, while the respondent No. 5 who is Political Science Professor was transferred from Government Degree College Barkhalozai Bajaur Agency to Government Postgraduate College Khar Bajaur Agency against the post of Associate Professor

in English. (Copy of impugned notification is attached as annexure "A").

4. That against the said impugned transfer order dated 20/10/2015 the appellant filed a departmental appeal on dated 28/10/2015. (Copy of departmental appeal is attached as annexure "B").
5. That the fate of the departmental appeal is still pending/ awaited in the office of respondent No. 1 inspite of lapes of three months time.
6. That feeling helpless, the appellant having no other adequate remedy, but to filed the instant appeal on the following grounds:

**GROUND:**

- A. That the appellant transfer impugned order dated 20/10/2015 is due to personal grudges of respondent No. 4 and have no legal footing to stand.
- B. That the impugned order dated 20/10/2015 is based on malafide and with ulterior motives of respondent No. 4 as the appellant along with other colleagues

have made few complaints against the respondent No. 4 to the high ups (with regard to misuse of Government property for personal benefits). (Copy of complaint is attached as annexure "C").

C. That the impugned order dated 20/10/2015 is against the law and rules for the reason that the respondent No. 5 who is a Professor of Political Science has been transferred against the post of Professor of English (the appellant is Professor of English).

D. That the mother of the appellant is paralyzed and need proper care and medication which is the sole responsibility of appellant, so as the new posting station (college) of the appellant is far away from his house, so makes it difficult for appellant to look after his mother. (Copy of medical prescriptions are attached as annexure "D").

E. That there is no single complaint against the appellant in his entire career.

5

- F. That the impugned order dated 20/10/2015 is not in public interest for the reason that in the said college there is shortage of English Professors whereas the respondent No. 5 in Professor of Political Science which cannot be a substitute for English for English Professor. (Workload distribution is attached).
- G. That any other points of law and fact will be argued with the permission of this Hon'ble Court at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of this Service Appeal the impugned orders/ notification No. FS/E/100-96 (Vol-9) 14538-46 of the appellant by the respondent No. 1 from Government Post Graduate College Khar Bajaur Agency to Government Degree, Barkhalozai, Bajaur Agency may kindly be cancelled.



Appellant

Through 

**Zahanat Ullah**  
Advocate High Court,  
Peshawar.

Dated: 17/02/2016

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

Service Appeal No. \_\_\_\_\_/2016

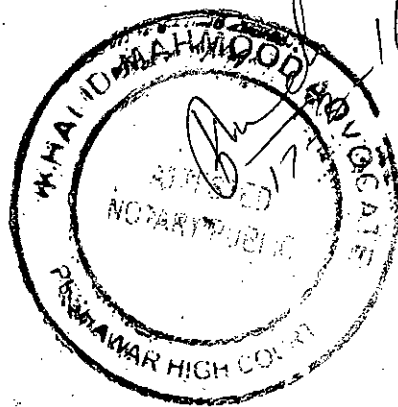
Muhammad Tahir .....(Appellant)

**VERSUS**

Additional Chief Secretary FATA, FATA Secretariat Warsak  
Road, Peshawar and others.....(Respondents)

**AFFIDAVIT**

I, Muhammad Tahir S/o Feroz Bakht R/o Degree  
College P.O Khar Tehsil Khar District Bajaur Agency, do  
hereby solemnly affirm and declare that all the contents of  
the accompanying **Service Appeal** are true and correct to  
the best of my knowledge and belief and nothing has been  
concealed from this Hon'ble Court.



*[Signature]*  
**DEPONENT**

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

Service Appeal No. \_\_\_\_\_/2016

Muhammad Tahir .....(Appellant)

**VERSUS**

Additional Chief Secretary FATA, FATA Secretariat Warsak Road, Peshawar and others.....(Respondents)

**ADDRESSES OF THE PARTIES**

**APPELLANT:**

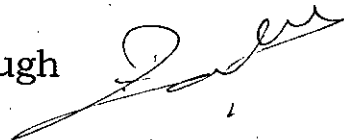
Muhammad Tahir S/o Feroz Bakht R/o Degree College P.O Khar Tehsil Khar District Bajaur Agency.

**RESPONDENTS:**

1. Additional Chief Secretary FATA, FATA Secretariat Warsak Road, Peshawar.
2. Director Education FATA, FATA Secretariat, Warsak Road, Peshawar.
3. Section Officer Establishment, FATA Secretariat, Warsak Road, Peshawar.
4. Principal Post Graduate College Khar Bajaur Agency.
5. Gul Haider Associate Professor in Political Science, Post Graduate College Khar Bajaur Agency.
6. Secretary Social Sector Department, FATA, FATA Secretariat Warsak Road, Peshawar.

Appellant

Through



**Zahanat Ullah**

Advocate High Court,  
Peshawar.

Dated: 17/02/2016

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

C.M. No. \_\_\_\_\_/2016

In -

Service Appeal No. \_\_\_\_\_/2016

Muhammad Tahir .....(Appellant)

**VERSUS**

Additional Chief Secretary FATA, FATA Secretariat Warsak Road, Peshawar and others.....(Respondents)

**APPLICATION FOR SUSPENSION OF THE  
IMPUGNED ORDER /NOTIFICATION NO.  
FS/E/100-96 (VO-9) 14538-46 DATED  
20/10/2015 VIDE WHICH THE  
RESPONDENT NO. 1 HAS TRANSFERRED  
THE APPELLANT FROM GOVERNMENT  
POST GRADUATE COLLEGE KHAR BAJAUR  
AGENCY TO GOVERNMENT DEGREE  
COLLEGE BARKHALOZAI, BAJAUR  
AGENCY, TILL THE FINAL DISPOSAL OF  
THE MAIN APPEAL.**



**Respectfully Sheweth:**

1. That the above mentioned appeal is filing by the appellant, which no date of hearing has yet been fixed.
2. That on the face of it, the applicant/ appellant has got a strong arguable case and is sanguine about its success.
3. That the balance of convenience also in favour of appellant/ applicant.
4. That if the operation of the impugned notification is not suspended that the appellant/ applicant would sustain an irreparable loss.

It is, therefore prayed that on acceptance of this application, the operation of the impugned Order /Notification No. FS/E/100-96 (Vo-9) 14538-46 dated 20/10/2015 vide which the respondent no. 1 has transferred the appellant from government Post Graduate College Khar

(10)

Bajaur agency to Government Degree College  
Barkhalozai, Bajaur agency. may kindly be  
suspended, till the final disposal of the main  
appeal..

*[Handwritten Signature]*

Appellant

Through

*[Handwritten Signature]*

**Zahanat Ullah**

Advocate High Court,  
Peshawar.

Dated: 17/02/2016





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

C.M. No. \_\_\_\_\_/2016.

In \_\_\_\_\_

Service Appeal No. \_\_\_\_\_/2016

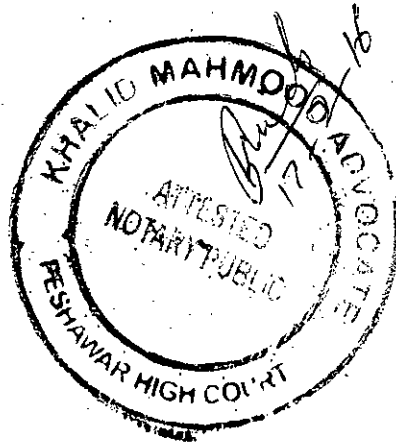
Muhammad Tahir .....(Appellant)

**VERSUS**

Additional Chief Secretary FATA, FATA Secretariat Warsak  
Road, Peshawar and others.....(Respondents)

**AFFIDAVIT**

I, Muhammad Tahir S/o Feroz Bakht R/o Degree  
College P.O Khar Tehsil Khar District Bajaur Agency, do  
hereby solemnly affirm and declare that all the contents of  
the accompanying **Application** are true and correct to the  
best of my knowledge and belief and nothing has been  
concealed from this Hon'ble Court.



*[Handwritten Signature]*  
**DEPONENT**

(12)



Establishment Section

*Attention  
Gul Haider  
Prd: GDC  
Barkhalozai*

**FATA SECRETARIAT**  
(ADMINISTRATION, PERSONNEL & COORDINATION DEPARTMENT)  
**WARSAK ROAD PESHAWAR**

**NOTIFICATION :-**

No.FS/E/100-96 (Vol-9) 14538-46. The following posting/transfers are hereby ordered with immediate effect in the public interest:-

| S.No | Name   | From  | To   | Remarks   |
|------|--|---|--|---|
| 1.   | Mr. Gul Haider,<br>Associate Professor in<br>Political Science<br>(BS-19). | Principal, Government<br>Degree College<br>Barkhalozai<br>Agency. | Government Postgraduate<br>College Khar Bajaur<br>Agency.  | Against the post of<br>Associate Professor<br>in English<br><br>(Vice No.2) |
| 2.   | Muhammad Tahir,<br>Associate Professor in<br>English (BS-19).              | Government<br>Postgraduate College<br>Khar Bajaur Agency.         | Government Degree<br>College Barkhalozai<br>Bajaur Agency. | Against the post of<br>Principal (BS-19).<br><br>(Vice No.1)                |

**ADDITIONAL CHIEF SECRETARY (FATA)**

Dated 20/10/2015

Copy to:-

1. Secretary Social Sectors Department FATA Secretariat
2. Director Education (FATA)
3. Political Agent Bajaur Agency
4. Principal, GDC Barkhalozai Bajaur Agency
5. Principal, GPGC Khar Bajaur Agency
6. Agency Accounts Officer Bajaur Agency
7. PS to Additional Chief Secretary FATA Secretariat
8. PS to Secretary A.I&C Department FATA Secretariat
9. Officers concerned

*[Signature]*  
Section Officer (Estab)

**ATTESTED**

*[Signature]*



FATA SECRETARIAT  
(SOCIAL SECTORS DEPARTMENT)  
WARSAK ROAD PESHAWAR

Dated Peshawar-29/07/2016

**NOTIFICATION:-**

No. SO (Edu)/SSD/4-Tiers/Colleges/FATA/4075-87. In the light of Presidential Order No.13 of 1972 and in pursuance of Higher Education, Archives and Libraries Department, Khyber Pakhtunkhwa's Notification No.SO(C-II)/HE/1-5/Four Tiers/2012-13 dated 22<sup>nd</sup> November, 2012 duly endorsed by Finance Department Khyber Pakhtunkhwa, the competent authority has been pleased to accord sanction to the updation of total sanctioned strength of 845 posts i.e. BPS-20, BPS-19, BPS-18 and BPS-17 (as on 01.07.2012) of FATA Colleges teaching cadre, on the basis of revised 04-Tier Formula, carrying the Ratio of 05:20:37:38 with immediate effect.

Breakup of the existing and revised strength of teaching staff in various educational institutions in FATA Colleges shall be as under:

| Grade  | Existing Position |        |       | Total Upgradation Due |        |       | Total Additionality |        |        |
|--------|-------------------|--------|-------|-----------------------|--------|-------|---------------------|--------|--------|
|        | Male              | Female | Total | Male                  | Female | Total | Male                | Female | Total  |
| BPS-20 | 2                 | 0      | 2     | 28                    | 14     | 42    | +(26)               | +(14)  | +(40)  |
| BPS-19 | 44                | 12     | 56    | 114                   | 55     | 169   | +(70)               | +(43)  | +(113) |
| BPS-18 | 122               | 48     | 170   | 211                   | 102    | 313   | +(89)               | +(54)  | +(143) |
| BPS-17 | 402               | 215    | 617   | 217                   | 104    | 321   | -(185)              | -(111) | -(296) |
| Total  | 570               | 275    | 845   | 570                   | 275    | 845   | -                   | -      | -      |

1. Break up showing revised strength of teaching staff in various colleges (M/F) in BPS-20, BPS-19, BPS-18 and BPS-17 in FATA is attached at Annexure A.

| Post   | Overall Revised Position on 01.07.2016 |        |       |
|--------|--|--------|-------|
|        | Male                                   | Female | Total |
| BPS-20 | 28                                     | 14     | 42    |
| BPS-19 | 114                                    | 55     | 169   |
| BPS-18 | 211                                    | 102    | 313   |
| BPS-17 | 217                                    | 104    | 321   |
| Total  | 570                                    | 275    | 845   |

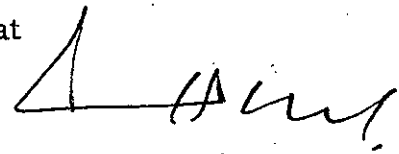
2. Authority. Approval of Prime Minister of Pakistan conveyed vide Finance Division Office Memorandum bearing No: F.No.1 (32) R-1/2015-251/2016 dated 30<sup>th</sup> May, 2016 and SAFRON Division letter No. No.3 (10)/TA/2015 dated 13-05-2016 (copy enclosed).

SECRETARY SOCIAL SECTORS (FATA)

Even No.& Date

Copy to:-

1. Secretary Finance Department, FATA Secretariat
2. Secretary A,I&C Department FATA Secretariat
3. Secretary Higher Education Department Khyber Pakhtunkhwa Peshawar
4. Additional Accountant General (PR) Sub Office Peshawar
5. Director Education (FATA)
6. Director Higher Education Khyber Pakhtunkhwa Peshawar
7. All Agency Education Officers in Agencies/FRs
8. All Principals of GPGCs/GDCs/GGDCs in FATA
9. All Agency Accounts Officers in FATA
10. District Accounts Officers, Kohat, Lakki, Bannu, D.I.Khan & Tank
11. SO (TA) SAFRON Division Islamabad with reference his office letter No.3(10) TA/2015 dated 13/5/2016
12. PS to Additional Chief Secretary FATA Secretariat
13. PS to Secretary Social Sectors Department FATA Secretariat



(Abdul Manan)  
Section Officer (Education)  
Social Sector Department

Government of Pakistan  
Finance Division  
(Regulation Wing)


\*\*\*

Endst No. 1(32) R-1/2015-610/2016

Dated:-27/9/2016

Copy to:-

1. Accountant General (PR) Islamabad.
2. Additional Accountant General (PR) Sub Office Peshawar
3. Director Education (FATA)
4. All Principals of GPGCs/GDCs/GGDCs in FATA
5. All Agency Accounts Officers in FATA
6. District Accounts Officers, Kohat, Lakki, Bannu, D.I.Khan & Tank
7. PS to Secretary Finance Department, FATA Secretariat



(Zia-ur-Rehman)  
Section Officer (R-I)

Original

Scale Wise Existing & Revised Strength of Male Colleges as per Ratio of 5:20:37:38 in FATA

| S.No | Name of Agency/ FR     | College          | Existing Position 1.07.2012 |                          |                          |               |       | Revised Position on 1.07.2016 |                          |                          |               |       |
|------|------------------------|------------------|-----------------------------|--------------------------|--------------------------|---------------|-------|-------------------------------|--------------------------|--------------------------|---------------|-------|
|      |                        |                  | Professor B-20              | Associate Professor B-19 | Assistant Professor B-18 | Lecturer B-17 | Total | Professor B-20                | Associate Professor B-19 | Assistant Professor B-18 | Lecturer B-17 | Total |
| 1    | Bajaur Agency ✓        | GPGC Bajaur      | 0                           | 4                        | 8                        | 21            | 33    | 3                             | 7                        | 11                       | 12            | 33    |
|      |                        | GDC Nawagai      | 0                           | 1                        | 4                        | 17            | 22    | 0                             | 4                        | 9                        | 9             | 22    |
|      |                        | GDC Bar Khalozai | 0                           | 1                        | 4                        | 17            | 22    | 1                             | 5                        | 8                        | 8             | 22    |
| 2    | Mohmand Agency Orakzai | GDC Lakaro       | 0                           | 1                        | 4                        | 17            | 22    | 1                             | 4                        | 8                        | 9             | 22    |
|      |                        | GDC Ekka Ghund   | 0                           | 3                        | 6                        | 22            | 31    | 2                             | 7                        | 11                       | 11            | 31    |
| 3    | Agency                 | GDC Ghiljo       | 0                           | 1                        | 4                        | 17            | 22    | 0                             | 4                        | 9                        | 9             | 22    |
| 4    | Kurram Agency          | GPGC Parachinar  | 1                           | 5                        | 11                       | 29            | 46    | 3                             | 9                        | 17                       | 17            | 46    |
|      |                        | GDC Sadda        | 0                           | 2                        | 5                        | 21            | 28    | 2                             | 5                        | 10                       | 11            | 28    |
|      |                        | GDC Bagan        | 0                           | 1                        | 4                        | 17            | 22    | 0                             | 5                        | 8                        | 9             | 22    |
|      |                        | GDC Dogar        | 0                           | 1                        | 4                        | 17            | 22    | 0                             | 5                        | 8                        | 9             | 22    |
| 5    | NWA                    | GPGC Miran Shah  | 1                           | 5                        | 11                       | 18            | 35    | 3                             | 7                        | 13                       | 12            | 35    |
|      |                        | GDC Mir Ali      | 0                           | 1                        | 4                        | 18            | 23    | 2                             | 4                        | 9                        | 8             | 23    |
| 6    | SWA                    | GDC Ladha        | 0                           | 2                        | 4                        | 9             | 15    | 0                             | 3                        | 6                        | 6             | 15    |
|      |                        | GDC Sam          | 0                           | 1                        | 4                        | 17            | 22    | 0                             | 5                        | 8                        | 9             | 22    |
|      |                        | GDC Wana         | 0                           | 2                        | 5                        | 18            | 25    | 1                             | 5                        | 9                        | 10            | 25    |

3

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|       |               |                      |   |    |     |     |     |    |     |     |     |     |
|-------|---------------|----------------------|---|----|-----|-----|-----|----|-----|-----|-----|-----|
| 7     | Khyber Agency | GDC Jamrud           | 0 | 1  | 4   | 17  | 22  | 2  | 3   | 9   | 8   | 22  |
|       |               | GDC Landi Kotal      | 0 | 4  | 7   | 13  | 24  | 2  | 4   | 9   | 9   | 24  |
|       |               | GDC Kohi Sher Haider | 0 | 1  | 4   | 17  | 22  | 2  | 4   | 8   | 8   | 22  |
| 8     | FR Peshawar   | Nil                  | 0 | 0  | 0   | 0   | 0   | 0  | 0   | 0   | 0   | 0   |
| 9     | FR Kohat      | GDC Dara Adam Khel   | 0 | 3  | 9   | 12  | 24  | 2  | 5   | 9   | 8   | 24  |
|       |               | GDC Ara Khel         | 0 | 1  | 4   | 17  | 22  | 0  | 5   | 8   | 9   | 22  |
| 10    | FR Bannu      | Kotka Habibullah     | 0 | 1  | 4   | 17  | 22  | 1  | 5   | 8   | 8   | 22  |
| 11    | FR Tank       | GDC Jandola          | 0 | 1  | 4   | 17  | 22  | 0  | 5   | 8   | 9   | 22  |
| 12    | FR Lakki      | Nil                  | 0 | 0  | 0   | 0   | 0   | 0  | 0   | 0   | 0   | 0   |
| 13    | FR D.I.Khan   | GDC Dara Zinda       | 0 | 1  | 4   | 17  | 22  | 1  | 4   | 8   | 9   | 22  |
| Total |               |                      | 2 | 44 | 122 | 402 | 570 | 28 | 114 | 211 | 217 | 570 |

Deputy Director Colleges  
Directorate of Education FATA

Section Officer Education  
SSD FATA Secretariat

**Scale Wise Existing & Revised Strength of Female Colleges as per Ratio of 5:20:37:38 in FAiA**

| S.No | Name of Agency/ FR | College         | Existing Position 1.07.2012 |                          |                          |               | Revised Position on 1.07.2016 |                |                          |                          |               |       |
|------|--------------------|-----------------|-----------------------------|--------------------------|--------------------------|---------------|-------------------------------|----------------|--------------------------|--------------------------|---------------|-------|
|      |                    |                 | Professor B-20              | Associate Professor B-19 | Assistant Professor B-18 | Lecturer B-17 | Total                         | Professor B-20 | Associate Professor B-19 | Assistant Professor B-18 | Lecturer B-17 | Total |
| 1    | Bajaur Agency      | GGDC Khar       | 0                           | 1                        | 4                        | 18            | 23                            | 1              | 4                        | 9                        | 9             | 23    |
| 2    | Mohmand Agency     | GGDC Ekka Ghund | 0                           | 1                        | 4                        | 18            | 23                            | 1              | 4                        | 9                        | 9             | 23    |
| 3    | Orakzai Agency     | GGDC Kalaya     | 0                           | 1                        | 4                        | 18            | 23                            | 1              | 4                        | 9                        | 9             | 23    |
| 4    | Kurram Agency      | GGDC Saddda     | 0                           | 1                        | 4                        | 18            | 23                            | 1              | 4                        | 9                        | 9             | 23    |
|      |                    | GGDC Parachinar | 0                           | 1                        | 4                        | 18            | 23                            | 1              | 4                        | 9                        | 9             | 23    |
|      |                    | GGDC Alizai     | 0                           | 1                        | 4                        | 17            | 22                            | 1              | 4                        | 9                        | 9             | 23    |
| 5    | NWA                | GGDC Miran Shah | 0                           | 1                        | 4                        | 18            | 23                            | 2              | 5                        | 8                        | 7             | 22    |
| 6    | SWA                | GGDC Wana       | 0                           | 1                        | 4                        | 18            | 23                            | 1              | 4                        | 9                        | 9             | 23    |
| 7    | Khyber Agency      | GGDC Jamrud     | 0                           | 1                        | 4                        | 18            | 23                            | 1              | 4                        | 9                        | 9             | 23    |
| 8    | FR Kohat           | GGDC Dara Adam  | 0                           | 1                        | 4                        | 18            | 23                            | 1              | 4                        | 9                        | 9             | 23    |
| 9    | FR Tank            | Khel            | 0                           | 1                        | 4                        | 18            | 23                            | 1              | 4                        | 9                        | 9             | 23    |
| 10   | FR D.I.Khan        | GGDC Jandola    | 0                           | 1                        | 4                        | 18            | 23                            | 1              | 4                        | 9                        | 9             | 23    |
|      |                    | GGDC Dara Zinda | 0                           | 1                        | 4                        | 18            | 23                            | 1              | 4                        | 9                        | 9             | 23    |
|      |                    | Total           | 0                           | 12                       | 48                       | 215           | 275                           | 13             | 49                       | 107                      | 106           | 275   |

Deputy Director Colleges  
Directorate of Education FATA

Section Officer Education  
SSD FATA Secretariat


(5)

**DIRECTORATE OF EDUCATION FATA SECRETARIAT PESHAWAR**

Endst No. 13567-678 dated 18/10 2016

Copy for information to the:

1. Secretary Higher Education Department Khyber Pakhtunkhwa.
2. Director Higher Education Khyber Pakhtunkhwa.
3. Additional Accountant General ( PR) Sub Office Peshawar.
4. Agency Education Officers in Agencies / FRs in FATA.
5. All the Principals Male and Female Colleges in FATA.
6. All the Agency / District Account Officers in FATA.
7. SO (TA) SAFRON Division Islamabad with reference his office letter No. 3(10) TA/2015 dated 13-05-2016.
8. Section Officer Education FATA Secretariat w/r to letter of even No. and date.
9. PS to Additional Chief Secretary FATA.
10. PS to Secretary Social Sectors FATA Secretariat.
11. PS to Secretary Finance FATA Secretariat.
12. PS to Secretary AI&C FATA Secretariat.
13. PA to Director Education FATA.

  
Deputy Director (Colleges)  
Directorate of Education FATA

To

The Additional chief secretary (FATA)  
FATA Secretariat, Peshawar.  
Through proper Channel.

Subj: - Appeal against transfer.

Sir,

This is in ref. to your letter No. FS/E/100-96 Vol.9. 1438-46 in which I have been transferred from GPGC. Khar to GDC Barkholzo as Principal.

Sir,

Respectfully, I want to present the following appeal with reservations about ~~the~~ <sup>the</sup> decision, and I hope you will sympathetically consider my request and cancel the order of my transfer, please.

1) Transfer and adjustments are part and parcel of the govt. services, however, the post of principal is administrative post. I have been refusing this for the past many years. It is a stressful job and I face many domestic problems. My mother is paralysed, lying on bed and I nurse her. I take her off and on to hospital for medical check-up.

I am senior most in FATA with two years' service left, so better to leave me at home station. However, with alternative proposal, if you do not mind, I can accept this offer of Principalship at home station (GPGC Khar), because the present principal has spent five years on this post and I have the right to become principal-by seniority and domicile as well

2) It is a violation of rules to adjust Political Science Prof. against the post of English, especially when I am currently occupying it. This is wrong posting to adjust Prof. of Political Science against prof. of English.

3) As per college need, I must stay here or the students and college shall suffer because each four Professors of English take at an average, 6 classes daily. The principal GC. Barakhalozo is MA. Political Science. By way of work load and need, he is not required at GPGC Khar. For, there already exists a regular Political Science professor with two other hired teachers, with work load of two classes per teacher per day. So, another Political Science Professor is not required at GPGC. Khar. If transferred, he will be drawing his pay Rs. 125000/- as bonus.

4) If I am transferred, the principal shall hire English teacher which shall be a financial burden. If he does not hire, the students shall suffer. So, there is no need to dislocate me as I am needed.

5) As a rule, two employees of dissimilar Post cannot be adjusted against each other, though their cadre and grade may be the same, especially in case, when the teacher of that subject is currently occupant of that post, (as I am). If I am not

ATTESTED  
*Alf*

redressed it will be the usurpation of my rights, subjection to torture, and this act of transfer contrary to justice and public interest.

Principal GC Barakhalozo has not served his home station Nawagai for a single day, during his entire service of 30 years. He has pre-emptive right to serve at GC Nawagai because he is a bonafide resident of Tehsil Nawagai and I have pre-emptive claim to GC. Khar area, to which I am a bonafide resident.

Irrespective of tenure. Govt. entitles an employee to be stationed in his place of birth to facilitate him during the discharge of his duties. So, the claim of the Principal Barakhalozo, that I have long stay at GC-Khar, is baseless. Which is equal to depriving me of my basic rights.

But sir, what mistakes I have made? I request you not to scapegoat me to the wishes of self-focused persons.

Sir,

The principal GPGC. Khar is partial and he is victimising me. He wants to get rid of me by hook or by crook as I am against his self-styled policies which are not compatible to Govt. rules. He may be seriously taken to task why he is running a Government institution according to his personal like and dislike and not according to rules.

As an example, he appointed a junior most person as BS. Co-ordinator in the presence of senior staff. Why the right of senior usurped.

Secondly, the department of Islamyat is over staffed. There are four Islamyat teachers, (one on detailed). Two teachers of Islamyat in BPS-17, one in BPS-18 and a fourth one in BPS-19. The daily work load, per Islamyat teacher, is two classes, why the 19 grade surplus employee in Islamyat department, is not transferred? It is due to partiality, favouritism and like and dislike policy with utter disregard of justice. Here the unneeded is adjusted (Principal, GC Barakhalozo), the most needed is thrown out (Prof. Muhammad Tahir), while the surplus is retained (Professor BPS-19, Islamyat).

In Economics Deptt. there are two professors, attending one class each. One teacher required but two retained--an utter mismanagement, the squander of exchequer.

In Law, department there are two teachers, attending one class each per day while each Professor has to attend a minimum of 4 classes daily. Why this irregularity? And why I am not tolerated here? Because, I am not an embezzler? Because I am not negligent of duties? Because I am regular and punctual?

Legal justification for my stay.

- a) According to the four tier formula I am stationed at GC Khar on one of the 4 approved posts of BPS-19 (see staff statement, attached).

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*[Signature]*

- b) There are 4 sanctioned posts of English subject and I am the occupants of one of them.
- c) Taking at an average of six classes per day, per teacher, my stay is in the public interest.
- d) I am a bonafide resident of Tehsil Khar by birth and GC. Khar is located in this area so, my claim by domicile is legal and length of tenure claim/excuse for my ousting is baseless
- e) I am not adversely reported, if so, substantiation needed.

In the light of the above facts, the principal of Barkhalozo has none of the above legal claims in his favour to proffer. So, the demand for interchange of the principals GC. Barkhalozo is naive and outlandish, and the transfer order/proposal arbitrary.

There is another question mark, and a big one. The principal GC Khar is indicted in certain matters. His decisions and performances are questionable from various angles. Why I am dislocated and he left? (Copies attached)

I request the honourable ACS to please take serious note of this mismanagement, favouritism, illegality and negligence of duties and inquire why he keeps this surplus staff, victimising the innocent when the stay is legally justified by way of work load, subject and vacant post. I request your honour not to reject or refuse me without solid reasons. As I have two years of my service left so, after the perusal make a decision which is not only just but generous as well.

With thanks.



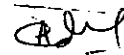
Muhammad Tahir  
 Associate Professor in English  
 GPGC Khar  
 Cell No. 03469840006  
 03078055401

28/10/2015

Advance Copies Sent to:

- 1) Secretary of Education FATA.
- 2) Minister of Education . KPK .

**ATTESTED**



3) ...

2) ...

1) ...

...

...

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ATTESTED

18/28/2015

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501018

Dr. [Signature]

Dr. [Signature]

- (1) [Illegible text]
- (2) [Illegible text]
- (3) [Illegible text]
- (4) [Illegible text]
- (5) [Illegible text]
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- (7) [Illegible text]
- (8) [Illegible text]
- (9) [Illegible text]



# DR. JEHANZEB KHAN

MBBS, FCPS (Physician)

Professor of Medicine

Altamash institute, Karachi

Tel #: 091-2553004, 2593450

ہر اتوار کو ناغہ ہوتا ہے

# ڈاکٹر جہانزیب خان

ایم۔ بی۔ بی۔ ایس۔ ایف۔ سی۔ پی۔ ایس

پروفیسر آف میڈیسن (میڈیکل سیشلسٹ)

کلینک: کراچی مارکیٹ، فلیٹ نمبر 4-A پبلی منزل

سوئی کارنو چوک خیر بازار پشاور

Name: m/o Tahis Age: 70y Date: 01/10/2014

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# DR. JEHANZEB KHAN

MBBS, FCPS (Physician)  
Professor of Medicine  
Alfamash institute, Karachi  
Tel #: 091-2553004, 2593450

# ڈاکٹر جہانزیب خان

ایم۔ بی۔ بی۔ ایس۔ ایف۔ سی۔ پی۔ ایس  
پروفیسر آف میڈیسن (میڈیکل پبلسٹ)  
کلینک: کراچی مارکیٹ، فلیٹ نمبر 4-A، پبلی ہول  
سوئیکار ٹوچک خیبر بازار پشاور

ہر اتوار کو ناغہ ہوتا ہے

Name: M/O Tahis Age: 70y Date: 28/08/2013

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ماہر امراض :- معده، گردہ، جوڑوں و پٹھوں کا درد، یرقان، سینہ تبوق، شوگر، فالج، قلب، جگر، مثانہ اور بلڈ پریشر

# DR. JEHANZEB KHAN

MBBS, FCPS (Physician)

Professor of Medicine

Alfamash institute, Karachi

Tel #: 091-2553004, 2593450

Cerebral  
144

## ڈاکٹر جہانزیب خان

ایم۔ بی۔ بی۔ ایس۔ ایف۔ سی۔ پی۔ ایس  
پروفیسر آف میڈیسن (میڈیکل سپیشلسٹ)  
کلینک: کراچی مارکیٹ، فلڈنگ نمبر A-4، پٹی منزل  
سویکار نوچوک خیبر بازار پشاور

Name: Mr. Tabir

Age: 85y

Date: 16/04/2013

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 0 740 muscc (2) (2)  
 0 740 STACOLIN (16) (14)  
 0 740 FOLIA  
 0 740 ORAPIN (16) (14)  
 0 740 VAN/CO (2) (1)  
 0 740 CANIP/IN (20)  
 0 740 ORAPIN (1)

CT brain ✓ B.P  
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الشفاء ایسی ہیستس  
 الشفاء برطیل شفاء  
 دہشت چوک  
 کاشف

100%  
 = 5%

ماہر امراض:- معده، گردہ، جوڑوں و پٹھوں کا درد، یرقان، سینہ تبوق، شوگر، فالج، قلب، جگر، مثانہ اور بلڈ پریشر

Attested  
 [Signature]

(21)

# Pak Clinical Laboratory

36-Karachi Market, Soekarno Square  
Khyber Bazar Peshawar.  
Tel: 091-2593450 Mob: 0333-9168831



Reg. No: HRA/500/110100107

پاک کلینیکل لیبارٹری (رجسٹرڈ)

36-کراچی مارکیٹ سوئیکارنو چوک خیبر بازار پشاور۔  
فون نمبر: 091-2593450

|                |                     |         |           |
|----------------|---------------------|---------|-----------|
| PATIENT NAME:  | M/O TAHER           | DATE:   | 16-Apr-13 |
| REF PHYSICIAN: | PROF DR JANZEB KHAN | AGE:    | Yrs       |
| TEST REQUEST:  | URINE ROUTINE EXAME | SEX:    | FEMALE    |
|                |                     | LAB ID: | 14        |

## Clinical Pathology Results

| Test             | Results                 | Normal                     |
|------------------|-------------------------|----------------------------|
| ESR              | 40 mm/1 <sup>st</sup> H | M (00 - 09)<br>F (00 - 15) |
| Glucose (Random) | 130 mg/dl               | 55 - 150                   |
| TLC              | 16,500 /cmm             | 4000 - 11000               |
| Hemoglobin       | 10.4 g/dl               | M: 14 - 18<br>F: 12 - 15   |
| MP               | NO MP SEEN              |                            |

**ATTESTED**  
*[Signature]*

*[Signature]*

Lab Technologist:.....

IN ANY CLINICAL DOUBT PLEASE SEND PATIENT FOR FREE REPEATION WITH IN 24 HOURS.  
NOTE: All Special Immunoassays are performed by fully Automatic VITROS ECIO Immunodiagnostic System  
{(Ortho-Clinical Diagnostics) a Johnson & Johnson Company USA & also FDA Approved}.

(22)

# Pak Clinical Laboratory

36-Karachi Market, Soekarno Square  
Khyber Bazar Peshawar.

Tel: 091-2593450 Mob: 0333-9168831



Reg. No: HRA/500/110100107

کلینیکل لیبارٹری (رجسٹرڈ)

# پاک

36-کراچی مارکیٹ سوکارنو چوک خیبر بازار پشاور۔

فون نمبر: 091-2593450

|                |                     |         |           |
|----------------|---------------------|---------|-----------|
| PATIENT NAME:  | M/O TAHER           | DATE:   | 16-Apr-13 |
| REF PHYSICIAN: | PROF DR JANZEB KHAN | AGE:    | Yrs       |
| TEST REQUEST:  | URINE ROUTINE EXAME | SEX:    | FEMALE    |
|                |                     | LAB ID: | 14        |

## URINE R/E

### PHYSICAL EXAMINATION

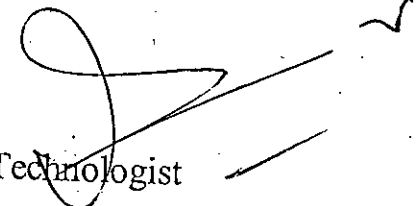
|            |             |
|------------|-------------|
| Colour     | Pale Yellow |
| Appearance | Clear       |
| Reaction   | Alkaline    |

### CHEMICAL EXAMINATION

|         |       |
|---------|-------|
| Albumin | Trace |
| Glucose | Nil   |

### MICROSCOPIC EXAMINATION

|                  |              |
|------------------|--------------|
| Pus Cells        | 08---10 /HPF |
| Red Cells        | 20---25      |
| Epith Cells      | 10-12        |
| Mucus Thread     | Nil          |
| Amorp Urates     | Nil          |
| Amorp Phosphates | Nil          |
| Calcium Oxalates | Nil          |
| Granular Cast    | Nil          |
| Hyaline Cast     | Nil          |

  
Lab Technologist

**ATTESTED**



IN ANY CLINICAL DOUBT PLEASE SEND PATIENT FOR FREE REPEATION WITH IN 24 HOURS.

NOTE: All Special Immunoassays are performed by fully Automatic VITROS ECIO Immunodiagnostic System  
{(Ortho-Clinical Diagnostics) a Johnson & Johnson Company USA & also FDA Approved}.

(23)

# Pak Clinical Laboratory

36-Karachi Market, Soekarno Square  
Khyber Bazar Peshawar.

Tel: 091-2593450 Mob: 0333-9168831



Reg. No: HRA/500/110100107

پاک کلینیکل لیبارٹری (رجسٹرڈ)

36-کراچی مارکیٹ سوکارنو چوک خیبر بازار پشاور۔

فون نمبر: 091-2593450

PATIENT NAME:- M/O TAHIR  
REF PHYSICIAN: PROF DR JEHANZEB KHAN  
TEST REQUEST: TLC

DATE: 1-Jan-14

AGE: Yr

“⊕”

LAB ID: 4191



## PATHOLOGY RESULTS

### Clinical pathology Reports

| Test | Results   | Normal       |
|------|-----------|--------------|
| TLC  | 9,600/cmm | 4000 - 11000 |

PAK CLINICAL LABORATORY

ATTESTED

*[Handwritten signature]*

*[Handwritten signature]*  
Lab Technologist

IN ANY CLINICAL DOUBT PLEASE SEND PATIENT FOR FREE REPEATION WITH IN 24 HOURS.

(24)

# PAK Clinical Laboratory



کلینیکل لیبارٹری (پشاور)

# پاک

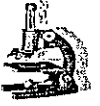
36-Karachi Market, Soekarno Square  
Khyber Bazar Peshawar.  
Tel: 091-2593450 Mob: 0333-9168831

Reg. No: HRA/500/110100107

36-کراچی مارکیٹ سویکارنو چوک خیبر بازار پشاور۔  
فون نمبر: 091-2593450

PATIENT NAME:- M/O TAHIR  
REF PHYSICIAN: PROF DR JEHANZEB KHAN  
TEST REQUEST: URINE RE

DATE: 1-Jan-14  
AGE: Yr  
"⊕"  
LAB ID: 4191



## PATHOLOGY RESULTS

### PHYSICAL EXAMINATION

|               |             |
|---------------|-------------|
| Color         | Pale Yellow |
| Appearance    | Clear       |
| Deposit       | Nil         |
| Reaction (PH) | Alkaline    |

### CHEMICAL EXAMINATION

|                    |       |
|--------------------|-------|
| Proteins (Albumin) | Trace |
| Glucose (Sugar)    | Nil   |

### MICROSCOPIC EXAMINATION

|                      |         |      |
|----------------------|---------|------|
| Pus Cells            | 15---18 | /HPF |
| Red Cells            | 00 - 01 |      |
| Epithelial Cells     | 15 - 20 |      |
| Amorphous Urates     | Nil     |      |
| Amorphous Phosphates | +++     |      |
| Calcium Oxalates     | Nil     |      |
| Granular Cast        | Nil     |      |
| Hyaline Cast         | 00 - 01 |      |
| Mucus Thread         | (+)     |      |
| Bacteria             | +++     |      |
| Others: -            |         |      |

Lab Technologist

IN ANY CLINICAL DOUBT PLEASE SEND PATIENT FOR FREE REPEATION WITH IN 24 HOURS.

ATTESTED

25

# Pak Clinical Laboratory

36-Karachi Market, Soekarno Square  
Khyber Bazar Peshawar.  
Tel: 091-2593450 Mob: 0333-9168831



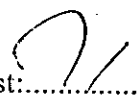
پاک کلینیکل لیبارٹری (رجسٹرڈ)

36-کراچی مارکیٹ سوکارنو چوک خیبر بازار پشاور۔  
فون نمبر: 091-2593450

Reg. No: MRA/500/110100107

|   |                               |
|---|-------------------------------|
| <u>PATIENT NAME:</u> <u>M/O TAHIR</u>               | <u>DATE:</u> <u>28-Aug-13</u> |
| <u>REF. PHYSICIAN:</u> <u>PROF DR JAHANZEB KHAN</u> | <u>AGE:</u> <u>Yr</u>         |
| <u>TEST REQUEST:</u> <u>TLC</u>                     | <u>SEX:</u> <u>FEMALE</u>     |
|   | <u>LAB ID:</u> <u>7843</u>    |

| <u>Test</u> | <u>Results</u> | <u>Normal</u> |
|-------------|----------------|---------------|
| TLC         | 5,900/cmm      | 4000 - 11000  |

Lab Technologist: 

IN ANY CLINICAL DOUBT PLEASE SEND PATIENT FOR FREE REPEATION WITH IN 24 HOURS.  
NOTE: All Special Immunoassays are performed by fully Automatic VITROS ECIO Immunodiagnostic System  
{(Ortho-Clinical Diagnostics) a Johnson & Johnson Company USA & also FDA Approved}.

ATTESTED  




(26)

Laboratory



کلینیکل لیبارٹری (رجسٹرڈ)

پاک

Market, Soekarno Square  
Nyber Bazar Peshawar.  
Tel: 091-2593450 Mob: 0333-9168831

Reg. No: HRA/500/110100107

36- کراچی مارکیٹ سویکار نوچوک خیبر بازار پشاور۔  
فون نمبر: 091-2593450

|  |                               |
|--|-------------------------------|
| <b>PATIENT NAME:</b> <u>M/O TAHIR</u>              | <b>DATE:</b> <u>28-Aug-13</u> |
| <b>REF PHYSICIAN:</b> <u>PROF DR JAHANZEB KHAN</u> | <b>AGE:</b> <u>Yr</u>         |
| <b>TEST REQUEST:</b> <u>URINE</u>                  | <b>SEX:</b> <u>FEMALE</u>     |
|  | <b>LAB ID:</b> <u>7843</u>    |

### URINE R/E

#### PHYSICAL EXAMINATION:

#### CHEMICAL EXAMINATION:

|               |             |                    |        |
|---------------|-------------|--------------------|--------|
| Color         | Pale Yellow | Albumin (Proteins) | Traces |
| Appearance    | Clear       | Glucose (Sugar)    | Nil    |
| Reaction (PH) | Acidic      |                    |        |

#### MICROSCOPIC EXAMINATION:

|                  |              |
|------------------|--------------|
| Pus Cells        | 03 - 04 /HPF |
| Red Cells        | 00 - 02      |
| Epit Cells       | 15 - 20      |
| Mucus Thread     | Nil          |
| Amorp Urates     | Nil          |
| Amorp Phosphates | Nil          |
| Calcium Oxalates | Nil          |
| Hyaline Cast     | Nil          |
| Granular Cast    | Nil          |
| Others: -        | Nil          |

**ATTESTED**  
*[Signature]*

Lab Technologist: *[Signature]*

**IN ANY CLINICAL DOUBT PLEASE SEND PATIENT FOR FREE REFPEATION WITH IN 24 HOURS.**

**NOTE: All Special Immunoassays are performed by fully Automatic VITROS ECIO Immunodiagnostic System ((Ortho-Clinical Diagnostics) a Johnson & Johnson Company USA & also FDA Approved).**

# Zeb Brothers

Chemist, Druggist & Dispenser

Mob: 0313-9556189

Mob: 0300-9077130

Opp: D.H.Q Hospital Timergara

Lic No: 342/RSL/2011

Date: 7/4/13

PROP:

Aurang Zeb Pharm D

No. 1996

Name: M/O MUHAMMAD TAHIR

| Qty | Products          | Rate         | Rs          | Amount | Ps |
|-----|-------------------|--------------|-------------|--------|----|
| 1bx | Tab Cerelex 100mg |              | 925         | -      | -  |
| 2   | Sp Dupatal        | 148          | 296         | -      | -  |
| 3bx | TO Norwase 10mg   |              | 466         | -      | -  |
| 2bx | TO Bredin 30mg    | 630          | 1260        | -      | -  |
| 2bx | tb Rolip 5mg      | 120          | 240         | -      | -  |
|     |                   |              | <u>2687</u> | -      | -  |
|     |                   | <b>Total</b> |             |        |    |

*[Large handwritten scribble]*

Gohar Printers Tmg: 0346-9120349

Signature *[Signature]*

**ATTESTED**

*[Handwritten signature]*



# DEPARTMENT OF PATHOLOGY

D.H.Q. Hospital Timergara Distt: Dir Lower

Name: M/ U G No 6 / 16 / 13 Lab No: 11566 Date: 4-7-07  
 Consultant: \_\_\_\_\_ Ward: \_\_\_\_\_ Ad.No: \_\_\_\_\_

| TEST                 | RESULT | NORMAL RANGE             | TEST                  | RESULT | N.VALUE      |
|----------------------|--------|--------------------------|-----------------------|--------|--------------|
| <b>CBC</b>           |        |                          | Pregnancy Test        |        |              |
| HB                   | 12.0   | M13-18/F11.5-16.5g/dl    | ASO Titre             |        | <200u/ml     |
| TLC                  |        | 4000-----11000/cmm       | RA Factor             |        |              |
| ESR                  |        | 0-----15mm/1st hr        | Hbs Ag                |        |              |
| Platelets Count      |        | 1,50,000-4,50,000/cmm    | HCV                   |        |              |
| <b>DLC</b>           |        |                          | HIV                   |        |              |
| Neuterophils         |        | 40-----75%               | ANF                   |        |              |
| Lymphocyets          |        | 20-----40%               | Smear For MP          |        |              |
| Monocytes            |        | 00-----08%               | <b>WIDAL</b>          |        |              |
| Eosinophils          |        | 00-----06%               | 1/20                  | 1/40   | 1/80         |
| <b>CHEMISTRY</b>     |        |                          | 1/160                 | 1/320  |              |
| Blood Sugar (F)      |        | F:70-110mg/dl            | TO                    |        |              |
| Blood Sugar @        | 95     | R:80-140mg/dl            | TH                    |        |              |
| S.Bilirubin Total    |        | Upto1.0mg/dl             | AH                    |        |              |
| S.Bilirubin Direct   |        | 0.25 mg/dl               | BH                    |        |              |
| S.Bilirubin Indirect |        |                          | <b>BRUCELLA TITRE</b> |        |              |
| SGPT                 |        | 10-----40u/l             | 1/20                  | 1/40   | 1/80         |
| ALK.Phosphate        |        | Upto 275u/l              | 1/160                 | 1/320  |              |
| S:Protens            |        | 6-----8g%                | BA                    |        |              |
| S:Albumin            |        | 3.2-----5g%              | BM                    |        |              |
| A/G Ratio            |        | 1.5:1::2.5:1             | <b>TOXOPLASMA</b>     |        |              |
| S.Uric Acid          |        | F2.4----5.7/M3.4--7mg/dl | 1/8                   | 1/16   | 1/32         |
| S:Urea               | 39     | 10-----50mg/dl           | 1/64                  |        |              |
| S: Creatinine        |        | 0.4-----1.5mg/dl         | <b>URINE R/E</b>      |        |              |
| C.K                  |        | 25-----190u/l            | Sugar                 |        |              |
| S.G.O.T              |        | 10-----40u/l             | Alb                   |        |              |
| L.D.H                |        | Upto 460u/l              | <b>M/Examination</b>  |        |              |
| S.Triglycerides      |        | 50-----150u/l            | RBC                   |        | /HPF         |
| S.Total Cholestrol   |        | <200mg/dl                | WBC                   |        | /HPF         |
| Sputum for AFB       |        | Upto 10mg/dl             | Cast                  |        | /HPF         |
| Scraping for fungus  |        |                          | Ca.Oxlt               |        | /HPF         |
| S: Calcium           |        |                          | Epithelii Cells       |        | /HPF         |
| Stool Examination    |        |                          | CT:                   |        | 3---8minutes |
| L.T Bodies           |        |                          | BT:                   |        | 1---5minutes |
|                      |        |                          | ICT for TB:           |        |              |

REMARKS: 

Tariq Press Timergara Cell: 0346-8009888

ATTESTED  


ATTESTED

*Handwritten signature*

*Admitted  
27/12/82  
Mrs. Suresh  
27/12/82  
27/12/82  
27/12/82*

*(C.A.)  
Sidda*

04 APR 1983

FACE VALUE RUPEES 5-

DISEASE

DATE 0068585

YEARLY NO

NAME *None*

OUT-PATIENTS DEPARTMENT

No. Rs. 5-

FACE VALUE RUPEES 5-

DATE *16/3/83*

YEARLY NO

NAME

OUT-PATIENTS DEPARTMENT

Medical No 2 *175* No. Rs. 5-

(32)  
Statistical detail

On what ground, [REDACTED] the Principal GC Khar says I am not needed in the English Deptt. Out of the total 2100 admitted students of the College, 1708 are English students. The details are taken from the admission lists, Time Table and Monthly Staff Statement of the College, which pl. see.

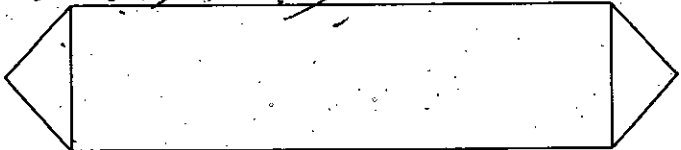
| Subjects(Arts) | Per Subject Students Detail      | Class Per Week Per Subjects | Classes Per day Per Subjects | No. of Teachers Per Subjects | Work load (Periods) per Teacher |                        |
|----------------|----------------------------------|-----------------------------|------------------------------|------------------------------|---------------------------------|------------------------|
| English        | 1 <sup>st</sup> Year             | 456                         | 138                          | 23                           | 4                               | 5-75<br><i>per day</i> |
|                | 1 <sup>st</sup> - self-finance   | 236                         |                              |                              |                                 |                        |
|                | 2 <sup>nd</sup> -                | 440                         |                              |                              |                                 |                        |
|                | 2 <sup>nd</sup> - (self-finance) | 225                         |                              |                              |                                 |                        |
|                | 3 <sup>rd</sup> -                | 202                         |                              |                              |                                 |                        |
|                | 4 <sup>th</sup> -                | 129                         |                              |                              |                                 |                        |
|                | BS                               | 20                          |                              |                              |                                 |                        |
|                | Total English =                  | 1708                        |                              |                              |                                 |                        |
| Civics         | 1 <sup>st</sup> year             | 199                         | 30                           | 5                            | 2/4                             | 2                      |
|                | 2 <sup>nd</sup> year             | 155                         |                              |                              |                                 |                        |
| Pol. Science   | 3 <sup>rd</sup> Year             | 51                          |                              |                              |                                 |                        |
|                | 4 <sup>th</sup> Year             | 77                          |                              |                              |                                 |                        |
|                | Total =                          | 482                         |                              |                              |                                 |                        |
| Islamyat       | 700/800 approximately            | 48                          | 8                            | 4                            | 2                               |                        |
| Law            | 3 <sup>rd</sup> Year             | 75                          | 12                           | 2                            | 2                               | 1                      |
|                | 4 <sup>th</sup> Year             | 40                          |                              |                              |                                 |                        |
|                | Total =                          | 115                         |                              |                              |                                 |                        |

*Muhammad Tahir*  
Muhammad Tahir  
Associate Professor  
GPGC Khar, Bajaur

**ATTESTED**

*ajf*

بعدالت لیسٹریٹھنٹو کورٹ کیس سرٹیسٹریٹھنٹو



مورخہ  
مقدمہ  
دعویٰ  
جرم

2ء منجانب

محمد طاہر بنام

Appeal

### باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
 آن مقام سے در کیلئے ذمہ داریوں کے لئے مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
 وکیل صاحب کو راضی نامہ کرنے و تقریر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور  
 بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
 ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی  
 اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت  
 مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے  
 تقریر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے  
 اور اس کا ساختہ پرداختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے  
 سبب سے وہوگا کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں  
 گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند رہے۔

محمد طاہر  
محمد طاہر

محمد طاہر  
محمد طاہر  
محمد طاہر

20/6

20/6

17

المرقوم

العبد العبد العبد  
مقام کے لئے منظور ہے۔

فارسی زبان میں  
لیکھی گئی ہے  
۲۵ مارچ ۲۰۱۶ء

فارسی زبان میں لکھی گئی ہے

امین احمد  
۱۵ مارچ ۲۰۱۶ء

امین احمد  
۱۵ مارچ ۲۰۱۶ء

۹

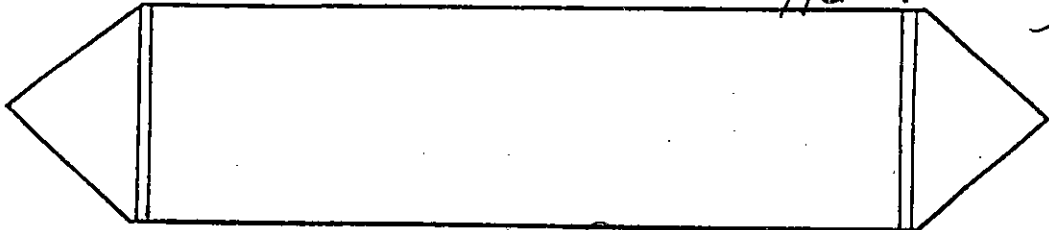
2016ء ۱۵ مارچ  
۲۴  
الزوم

مقدمہ: میں نے یہ خط لکھنا بہت ہی مشکل محسوس کیا ہے۔ میں نے اپنے  
ذہن میں سوچا کہ میں اس معاملے میں کون سا فیصلہ کرنا چاہتا ہوں۔  
میں نے سوچا کہ میں اس معاملے میں کون سا فیصلہ کرنا چاہتا ہوں۔  
میں نے سوچا کہ میں اس معاملے میں کون سا فیصلہ کرنا چاہتا ہوں۔  
میں نے سوچا کہ میں اس معاملے میں کون سا فیصلہ کرنا چاہتا ہوں۔  
میں نے سوچا کہ میں اس معاملے میں کون سا فیصلہ کرنا چاہتا ہوں۔  
میں نے سوچا کہ میں اس معاملے میں کون سا فیصلہ کرنا چاہتا ہوں۔  
میں نے سوچا کہ میں اس معاملے میں کون سا فیصلہ کرنا چاہتا ہوں۔

امین احمد  
۱۵ مارچ ۲۰۱۶ء

امین احمد

مقدمہ  
۱۵ مارچ  
۲۰۱۶ء



امین احمد

۲۰۱۶ء مارچ ۱۵

۵-۴



**BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Appeal No: 154/2016.

Muhammad Tahir.....Appellant.

**VERSUS**

1. The Additional Chief Secretary FATA, FATA Secretariat Warsak Road Peshawar.
2. The Director Education FATA Warsak Road, Peshawar
3. The Section Officer Establishment, FATA Secretariat, Peshawar.
4. Principal Post Graduate College Khar Bajaur Agency.
5. Gul Haider Associate Professor in Political Science, Post Graduate College Khar Bajaur.
6. Secretary Social Sector Department, FATA Secretariat, Peshawar.....(Respondents).

**Para-wise comments on behalf of respondent No: 1, 2, & 6.**

**Respectively Sheweth:**

**Preliminary Objection**

1. That the appellant has got no cause of action to file the instant appeal.
2. That the appellant has not come to this Honourable Tribunal with clean hands.
3. That the appellant has concealed material facts from this Honourable Tribunal.
4. That the appellant is estopped by his own conduct to bring the present appeal.
5. That the appeal is bad due to mis-joinder and non-joinder of necessary parties.
6. That the appeal is barred by law and not maintainable being devoid of merit.

**On Facts:**

1. No comments. Pertains to record.
2. No comments. Pertains to record.
3. Incorrect. That the appellant has completed his normal tenure, according to the government transfer/posting policy at his previous station and has served for 29 years at the said station according to the available record (copy attached as Annexure "A"). The Appellant transfer order has been issued by competent authority in accordance with law & rules and adjusted against the post of Principal Govt; Degree College Barkhalozai, Bajaur Agency in the interest of public service. (Annex: B)
4. No. comments. Pertains to record.
5. No coments, Pertains to record.
6. No comments. However, reply on the grounds are as under :-

**Ground.**

- A. Incorrect. The appellant has been transferred in public service and has no right to perform his duty according to his wishes. The appellant being Civil Servant is supposed to serve anywhere under the rules where his services are required being government employee. Every Transfer made in public service/interest is subject to law/rules.
- B. Incorrect. The appellant transfer order has been issued by the Competent Authority in accordance with law and Rules. No action has been taken which is against the norms of natural justice.
- C. Incorrect. The Principal of the college concerned had earlier recommended for Political Science Lecturers vide letter No. 196 dated 18.08.2014 (copy attached as annex: C). Whereas the appellant is Professor for English subject and as per staff statement of the college there are four English Lecturers available for students. The appellant has been adjusted on the Principal Post in the same agency.

- D. Incorrect. The appellant has been posted as Principal GDC Barkhalozai, situated in Bajour Agency, so he is posted in the same agency and at his home station.
- E. No comments.
- F. Incorrect. As explained in Para No. C above.
- G. Respondents also seeks permission to advance other grounds at the time of arguments.

In the light of above facts it is most humbly prayed that the appeal may be dismissed in favour of the respondents with cost.

Respondent No. 1.

For   
Additional Chief Secretary FATA

Respondent No.2.

  
Director Education FATA.

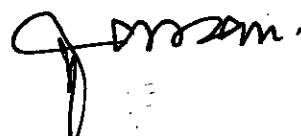
Respondent No.6.

  
Secretary Social Sectors FATA.

AFFIDAVIT

We the above respondents do hereby declare and affirm that the above comments are true and correct to the best of our Knowledge and belief that nothing has been concealed from this Honorable Tribunal.

Respondents No.1.

For   
Additional Chief Secretary FATA.

Respondents No. 2.

  
Director Education FATA.

Respondents No. 6.

  
Secretary Social Sectors Deptt;

**MONTHLY STAFF STATEMENT OF GOVT: POSTGRADUAE COLLEGE KHAR BAJAUR AGENCY FOR AUGUST, 2015**

| S.No. | Name                    | Designation   | BPS | Mode of Appointment | Qualification. | D/O Birth | Domicile | CNIC          | D/O Ist: Appott: | D/O TAKING CHARGE IN THIS COLLEGE | Contact No: |
|-------|-------------------------|---------------|-----|---------------------|----------------|-----------|----------|---------------|------------------|-----------------------------------|-------------|
| 1     | Mr. Gul Badshah.        | PRINCIPAL./AP | 19  | Regular             | Islamiyat      | 01.05.58  | Bajaur.  | 2110645911227 | 04.01.87         | 01.07.06                          | 03009072782 |
| 2     | Mr. Muhammad Tahir.     | Asociat Prof. | 19  | Regular             | English ✓      | 01.11.57  | Bajaur.  | 2110303901833 | 17.10.81         | 10.06.87                          | 03078055401 |
| 3     | Mr. Muslim Khan.        | Asociat Prof. | 19  | Regular             | Urdu           | 08.07.56  | Bajaur.  | 2110309217003 | 01.05.77         | 01.03.86                          | 03012815742 |
| 4     | Mr. Abdur Rahman        | Asociat Prof. | 19  | Regular             | Islamiyat      | 15.05.58  | Bajaur.  | 2110664675179 | 12.10.89         | 01.12.12                          | 03432476511 |
| 5     | Mr. Muhammad Nisar Khan | Asstt:Prof    | 18  | Regular             | Law            | 01.04.69  | Bajaur   | 2110309653031 | 16.05.94         | 14.09.11                          | 03008848483 |
| 6     | Mr. Muhd. Abdul Haq     | Asstt:Prof    | 18  | Regular             | Botany         | 18.05.71  | Bajaur   | 2110519861881 | 18.04.98         | 01.02.12                          | 03456032338 |
| 7     | Mr. Fazle-Subhan        | Asstt:Prof    | 18  | Regular             | Islamiyat      | 29.06.70  | Bajaur   | 2110625298845 | 22.10.98         | 20.11.13                          | 03068529781 |
| 8     | Mr. Muhd. Umar.         | Asstt:Prof    | 18  | Regular             | Economics      | 01.10.74  | Bajaur.  | 2110316745683 | 22.01.03         | 22.04.14                          | 03038800452 |
| 9     | Mr. Ziaul Haq.          | Asstt:Prof    | 18  | Regular.            | Urdu           | 03.04.74  | Bajaur   | 2110323007205 | 01.10.07         | 01.08.10                          | 03459155616 |
| 10    | Mr. Azeem Shah          | Asstt:Prof    | 18  | Regular             | Islamiyat      | 01.01.71  | Bajaur.  | 2110421538499 | 23.09.98         | 01.07.11                          | 03025968628 |
| 11    | Mr. Rahmanullah.        | Asstt:Prof    | 18  | Regular             | English. ✓     | 07.03.80  | Bajaur   | 2110421617169 | 05.01.08         | 06.01.08                          | 03005985696 |
| 12    | Mr. Anwar Khitab        | Asstt:Prof    | 18  | Regular             | Mathematics    | 25.03.76  | Bajaur   | 1610215104393 | 11.10.07         | 01-03-15                          | 03449182152 |
| 13    | Mr. Abdur Rashid        | Lecturer      | 17  | Regular             | Chemistry      | 03.04.84  | Bajaur   | 2110681853631 | 31.03.11         | 01.04.11                          | 03449270311 |
| 14    | Mr. Aminul Haq          | Lecturer      | 17  | Regular             | Botany         | 01.04.83  | Bajaur   | 2110389935711 | 11.03.10         | 12.03.10                          | 03082870383 |
| 15    | Mr. Ashfaq Ahmad        | Lecturer      | 17  | Regular             | Zoology        | 09.02.77  | Bajaur   | 2110738794037 | 01.08.09         | 16.07.11                          | 03005700074 |
| 16    | Mr. Shah Khalid         | Lecturer      | 17  | Regular             | Zoology        | 08.03.82  | Bajaur   | 2110322947415 | 19.03.08         | 01.02.13                          | 03456795958 |
| 17    | Mr. Ikhtiar Gul.        | Lecturer      | 17  | Regular             | Pak: Study     | 10.08.79  | Mohmand  | 3740506288107 | 17.11.09         | 17.11.09                          | 03059027799 |
| 18    | Mr. Muhammad Imran Khan | Lecturer/DPE  | 17  | Regular             | M. Sc (HPE)    | 08.02.84  | Bajaur   | 2110356237423 | 28.02.09         | 03.11.11                          | 03009534955 |
| 19    | Mr. Anwar Khan          | Lecturer      | 17  | Regular             | Chemistry      | 14.01.87  | Bajaur   | 2110384366137 | 28.06.12         | 30.06.12                          | 03088453821 |
| 20    | Mr. Fazal Wahed.        | Lecturer.     | 17  | Regular             | Physics        | 15.10.85  | Bajaur   | 2110319437831 | 24.11.11         | 24.11.11                          | 03038800979 |
| 21    | Mr. Iftikharud Din.     | Lecturer      | 17  | Regular             | Compt: Sc: ✓   | 20.08.81  | Bajaur   | 2110323074125 | 24.11.11         | 17.07.13                          | 03038261411 |
| 22    | Mr. Rahimullah          | Lecturer.     | 17  | Regular             | English ✓      | 06.04.82  | Bajaur   | 2110560792959 | 24.11.11         | 10.12.10                          | 03065171830 |
| 23    | Mr. Salim Jan           | Lecturer      | 17  | Regular             | English ✓      | 01.01.81  | Bajaur   | 2110626716867 | 31.10.03         | 03.08.12                          | 03005171266 |
| 24    | Mr. Zakir Khan          | Lecturer      | 17  | Regular             | Pol: Science ✓ | 13.08.85  | Bajaur   | 2110604694633 | 06.10.11         | 10.10.11                          | 03338895458 |
| 25    | Mr. Jehangir Khan       | Lecturer      | 17  | Adhoc               | History        | 04.04.85  | Bajaur   | 2110360979249 | 06.10.11         | 08.10.11                          | 03459384399 |
| 26    | Mr. Muhammad Ismail     | Lecturer      | 17  | Regular             | Statistics     | 17.03.82  | Bajaur   | 1710211643769 | 06.10.11         | 08.10.11                          | 03469089610 |
| 27    | Mr. Said Badshah        | Lecturer      | 17  | Adhoc               | Pashto         | 10.03.77  | Bajaur   | 2110421782943 | 06.10.11         | 07.10.11                          | 03025474405 |
| 28    | Mr. Bakht Shah Zeb      | Lecturer      | 17  | Regular             | Physics        | 04.01.85  | Bajaur   | 2110386910849 | 06.10.11         | 10.10.11                          | 03085691863 |
| 29    | Mr. Safi Ullah          | Lecturer      | 17  | Adhoc               | Maths          | 05.01.88  | Bajaur   | 2110440509985 | 06.10.11         | 12.10.11                          | 03065747549 |
| 30    | Mr. Gul Abdul Majeed    | Lecturer      | 17  | Adhoc               | Law            | 02.04.85  | Bajaur   | 2110510854829 | 06.10.11         | 08.10.11                          | 03088437664 |
| 31    | Mr. Shafiq ur Rahman    | Lecturer      | 17  | Regular             | Economics      | 17.04.84  | Bajaur   | 2110381554225 | 03.08.12         | 01.11.14                          | 03005823456 |
| 32    | Mr. Abdul Amin          | Lecturer      | 17  | Regular             | Urdu           | 10.08.87  | Bajaur   | 2110209141867 | 26.05.14         | 01.03.215                         | 03009021120 |
| 33    | Mr. Usman Ghani         | Librarian     | 17  | Regular             | M. Sc. Libray: | 04.07.84  | Peshawar | 2250152674733 | 26.04.11         | 15.04.15                          | 03429074272 |
| 34    | Mr. Pasham Gul          | Supdt.        | 17  | Regular             | FA             | 14.04.56  | Mardan   | 1610111451737 | 01.01.80         | 25.03.14                          | 03125817920 |
| 35    | Mr. Gul Zada            | Lab: Assitt:  | 10  | Regular             | BA             | 11.11.55  | Bajaur   | 2110665266205 | 01.03.76         | 01.03.76                          | 0945613916  |
| 36    | Mr. Farooq Khan         | Lab: Assitt:  | 10  | Regular             | MA Pashto      | 05.05.59  | Bajaur   | 2110322949967 | 01.03.83         | 01.03.83                          | 03075710327 |
| 37    | Mr. Gul Rasool          | Senior Clerk  | 14  | Regular             | MA Urdu        | 02.04.70  | Bajaur   | 2110364991499 | 24.08.91         | 01.12.03                          | 03028078800 |
| 38    | Mr. Sajid Saeed         | Junior Clerk  | 11  | Regular             | B. SC:         | 05.03.90  | Bajaur   | 2110314372129 | 01.11.11         | 01.11.11                          | 03059298689 |
| 39    | Mr. Hasan Khan.         | Lab: Assitt:  | 07  | Regular             | FA             | 10.02.69  | Bajaur   | 2110622569653 | 01.10.89         | 01.10.89                          | 03453967009 |
| 40    | Mr. Burhan ud Din       | Lab: Assitt:  | 07  | Regular             | FA             | 01.04.95  | Bajaur   | 2110695360069 | 21.04.14         | 01.01.15                          | 03059071078 |
| 41    | Mr. Muhammad Ilyas      | Lab: Assitt:  | 07  | Regular             | B. Sc (Comp)   | 04.07.85  | Bajaur   | 2110395676869 | 21.04.14         | 01.01.15                          | 03029801078 |

K.A.S

DETAIL OF CLASS-IV

REGULAR SANCTIONED POST

| Name of post | BPS | NO. OF POSTS | WORKED | VACANT | REMARKS   |
|--------------|-----|--------------|--------|--------|-----------|
| Aso:Prof     | 19  | 04           | 04     | 00     |           |
| Asst:Prof    | 18  | 08           | 08     | 00     |           |
| Lecturer     | 17  | 26           | 19     | 07     | Lecturers |
| DPE/Lib:     | 17  | 02           | 02     | 00     |           |
| Total        |     | 40           | 33     | 07     |           |

| Name of post | BPS  | NO OF POSTS | WORKED | VACANT | REMARKS |
|--------------|------|-------------|--------|--------|---------|
| N. Qasid     | 1&2  | 04          | 04     | 00     |         |
| Chowkidar    | 1&2  | 05          | 05     | 00     |         |
| Mali         | 02   | 03          | 03     | 00     |         |
| Bearer       | 01   | 02          | 02     | 00     |         |
| Behishti     | 02   | 04          | 04     | 00     |         |
| Sweeper      | 02   | 01          | 01     | 00     |         |
| Khakrob      | 02   | 01          | 01     | 00     |         |
| Cook         | 1&2  | 02          | 02     | 00     |         |
| Lab:Attd.    | 7&10 | 04          | 04     | 00     |         |
| Total        |      | 26          | 26     | 00     |         |

MINISTERIAL STAFF SANCTION.

| Name of post | No. of Posts | BPS   | Worked | Vacant |
|--------------|--------------|-------|--------|--------|
| Supdt.       | 1            | 17    | 01     | 00     |
| Asstt.       | 1            | 16    | 00     | 01     |
| S/Clerk      | 1            | 14    | 01     | 00     |
| J/Clerk      | 1            | 11    | 01     | 00     |
| L./Asstt.    | 5            | 07/10 | 05     | 00     |
| P.Imam       | 1            | 05    | 1      | 00     |
| Driver       | 2            | 05    | 2      | 00     |
| T.Optr.      | 1            | 04    | 1      | 00     |
| C.IV         | 26           | 01    | 26     | 00     |
| Total.       | 39           |       | 38     | 01     |


CLASS WISE ENROLMENT.

| Class                     | Medical | Engineering | Computer Engineering | Inter science | Arts | Total. |
|---------------------------|---------|-------------|----------------------|---------------|------|--------|
| 1 <sup>st</sup> year      | 106     | 59          | 42                   | 68            | 199  | 480    |
| 1 <sup>st</sup> year Self | 192     | 46          | 14                   | ..            | ..   | 237    |
| 2 <sup>nd</sup> year      | 113     | 82          | 09                   | 52            | 157  | 413    |
| 2 <sup>nd</sup> year Self | 52      | 17          | 06                   | ..            | ..   | 252    |
| 3 <sup>rd</sup> year      | 102     | 89          | 13                   | ..            | 214  | 418    |
| 4 <sup>th</sup> year      | 79      | 62          | 18                   | 0             | 220  | 379    |
| 5 <sup>th</sup> year      | 0       | 0           | 0                    | 0             | 30   | 30     |
| 6 <sup>th</sup> year      | 00      | 00          | 00                   | 00            | 20   | 20     |
| Total.                    | 644     | 355         | 102                  | 120           | 840  | 2215   |

Endost: No. 533-34 dated 19/09 2015

Copy forwarded to the:

1. Director of Education (FATA) Secretariat warsak Road Peshawar
2. Agency Education Officer, Bajaur Agency at Khar

  
PRINCIPAL  
GPGC KHAR BAJAUR AGENCY



Establishment Section

(12)  
Attention  
Gul Haider  
Prk: GDC  
Barkhalozai

FATA SECRETARIAT  
(ADMINISTRATION, FINANCE & COORDINATION DEPARTMENT)  
WARSAK ROAD PESHAWAR

## NOTIFICATION :-

No.FS/E/100-96 (Vol-9) 14538-46 The following posting/transfers are hereby ordered with immediate effect in the public interest:-

| S.No | Name   | From   | To   | Remarks   |
|------|--|--|--|---|
| 1.   | Mr. Gul Haider,<br>Associate Professor in<br>Political Science<br>(BS-19). | Principal, Government<br>Degree College<br>Barkhalozai<br>Bajaur Agency. | Government Postgraduate<br>College Khar Bajaur<br>Agency.  | Against the post of<br>Associate Professor<br>in English<br><br>(Vice No.2) |
| 2.   | Muhammad Tahir,<br>Associate Professor in<br>English (BS-19).              | Government<br>Postgraduate College<br>Khar Bajaur Agency.                | Government Degree<br>College Barkhalozai<br>Bajaur Agency. | Against the post of<br>Principal (BS-19).<br><br>(Vice No.1)                |

ADDITIONAL CHIEF SECRETARY (FATA)

Dated 20/10/2015

Copy to:-

1. Secretary Social Sectors Department FATA Secretariat
2. Director Education (FATA)
3. Political Agent Bajaur Agency
4. Principal, GDC Barkhalozai Bajaur Agency
5. Principal, GPGC Khar Bajaur Agency
6. Agency Accounts Officer Bajaur Agency
7. PS to Additional Chief Secretary FATA Secretariat
8. PS to Secretary A.I&C Department FATA Secretariat
9. Officers concerned

Section Officer (Estab)



OFFICE OF THE PRINCIPAL  
GPGC KHAR BAJAUR AGENCY.

No: 196 dt: 18/8 2014

TO,

The Director of Education,  
(FATA) Secretariat Warsak  
Road Peshawar.

Subject: - FILLING OF VACANT POSTS.

Memo:

It is stated in your honour that 08 numbers of Posts in various subjects are lying vacant since long due to promotion and transfer of lecturers/Professors.

This institute facing a lot of difficulties and hardships due to shortage of teaching Staff.

It is therefore requested that the vacant posts may please be filled up by adjusting them in the following subject.

- |                        |    |
|------------------------|----|
| 1. Political Science   | 03 |
| 2. Mathematics         | 02 |
| 03. Physics.           | 01 |
| 04. Computer Science   | 01 |
| 05. Librarian/Lecturer | 01 |

Monthly staff Statement is hereby submitted for ready reference.

Endost: No: 197-98 dated 18/8 /2014

Copy forwarded to the:

1. Director Higher Education Khyber Pakhtunkhwa Peshawar.
2. Political Agent Bajaur Agency.

  
PRINCIPAL  
GPGC KHAR BAJAUR AGENCY

  
PRINCIPAL  
GPGC KHAR BAJAUR AGENCY

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

IN RE:  
Service Appeal No. 154 / of 2016

Muhammad Tahir son of Feroz Bakht... .. Appellant

VERSUS


Additional Chief Secretary FATA and 5 others ... Respondents

**INDEX**

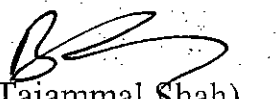
| S. No | Description of Documents  | Annexures  | Pages                  |
|-------|---|------------|------------------------|
| 1.    | Contents of Written Statement on behalf of Respondents No.4 and 5 |            | 1 - 5                  |
| 2.    | Affidavit   |            | 0 - 6                  |
| 3.    | Copies of relevant documents                                      | R/1 to R/3 | 7-12                   |
| 4.    | Relevant Demand for Professor in Political Science Department     | R/4        | <del>12</del><br>13-14 |
| 5.    | Vakalat Nama (On Original File)                                   |            |                        |

Respondents No.4&5

Through:

  
(Ghulam Nabi Khan)  
Advocate,  
Supreme Court of Pakistan  
B-17, Haroon Mansion  
Khyber Bazar, Peshawar  
Cell # 0300-5845943

And

  
(Mian Tajammal Shah)  
Barrister, Peshawar.

Dated: 13. 6. 2016



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

IN RE:  
Service Appeal No. 154 / of 2016

Muhammad Tahir son of Feroz Bakht... Appellant

VERSUS

Additional Chief Secretary FATA and 5 others ... Respondents

---

**WRITTEN STATEMENT ON BEHALF  
OF RESPONDENTS No.4 AND 5.**

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Respectfully Sheweth:

Written Statement on behalf of respondents No.4 and 5 is as under:-

PRELIMINARY OBJECTINS:

1. That the appellant has got no cause of action.
2. That the appellant has not approached this Honourable Tribunal with clean hands.
3. That the apeplalnt has been transferred after serving in the College for a long tenure extending over more than 28 years, whereas as according to the Transfer Policy a person can be transferred after completing his 3 years service at a station.
4. That still the appellant is at his home station for the reason that the place of his posting is hardly at a distance of 20-25 Minutes from his residence.

5. That the appellant has filed the instant appeal with the malafide intentions to pressurize the respondent Department and specially the replying respondents.

ON FACTS:

1. That para No.1 needs no comments.
2. That para No.2 also needs no comments.
3. That para No.3 is wrong and denied. No involvement whatsoever verbally or written of respondent No.4 is there in the Transfer of the appellant, however, the transfer is a right of the department and the department is at liberty to transfer any Civil servant/employee anywhere throughout the Province where his services are required. The appellant took over the charge at Government Post Graduate College (GPGC) Khar on 10.06.1987 and remained in the same College until 20.10.2015 after serving almost 28 Years 4 Months and 10 Days in the above noted College. Furthermore it has wrongly been mentioned therein that respondent No.5 has been transferred to the above noted College in some like and dislike process and respondent No.5 is the Professor of Political Science and the appellant is Professor in English. The above noted College was deficient with regard to the Professor in Political Science, whereas a number of Professors in English are still serving there in the College till today, hence the number of the English Professor was more than the requirements. (Copies of the relevant documents are attached herewith as annexures R/1 to R/3).
4. That para No.4 although needs no reply on behalf of the replying respondents, however, since long respondent No.4 has been demanding to fulfill the vacant vacancies of Political Science Professors as they are needed to fulfill the requirements of Political Science Department. (Copy of the relevant Demand is attached as annexure R/4).
5. That para No.5 needs no reply on behalf of the replying respondents.

- 3
6. That para No.6 needs no reply on behalf of the replying respondents.

GROUNDINGS:

- a. Wrong and denied. The appellant transfer has been made on the reasonable, cogent grounds, as he has passed more than 28 years in the above said College and still he wants to stay over there without any reasonable grounds as the number of the English Professors in the above noted College are more than the requirement and the Political Science Department needed a Professor, hence the department has rightly transferred the appellant and has brought respondent in the Political Science Department of the above said College.
- b. Wrong and denied. No malafide of whatsoever can be attached to the respondent Department as well as to the replying respondents. The malafide is at the part of the appellant on which he has used political and undue pressure and remained for an extra ordinary long tenure of more than 28 years in the above noted College. Furthermore, the copy of the complaint as attached with the appeal as annexure 'C' exposes the character of the appellant for using his undue pressure on the Principal, respondent No.4 against his transfer orders.
- c. Wrong and denied. As according to the prevailing rules and regulations each and every Civil Servant/Government Employee is liable to be transferred anywhere in the Province, furthermore

nobody can claim his transfer as malafide or illegal if it is made after passing his tenure of 3 years as mentioned in the concerned rules/regulations of the Education Department. Furthermore, it is very much clear in the reply of the replying respondents that the College was badly in the need of Professor of Political Science, whereas the number of the English Professors was already exceeded from the required number of the Professors.

- d. Wrong and denied. The plea of the appellant with regard to the illness of his mother cannot be considered for the simple reason that the station where the appellant has been transferred is just at a distance of 20-25 Minutes and both the Colleges are situated at a distance of 10-15 Kilo Meters, hence the plea of the appellant that he has been thrown out of his home station is wrong and based on the malafide intention of the appellant, he cannot use the illness of his mother for keeping the appellant in the same College throughout his service, furthermore the mother of the appellant is staying with his other brothers and he has to do nothing with the day to day care of his mother.
- e. Wrong and denied. It is not necessary that there should be a complaint against an employee to transfer him from one station to another station. Transfer/posting of the Civil Servants is a part of their service and under the prevailing rules and regulations they can be transferred anywhere in the Province if even there is no complaint against any Civil Servant.

5

f. Wrong and denied. The impugned order dated 20.10.2015 is quite in the public interest as it has been explained in the above paras that the above noted College needed a Professor in Political Science and whereas the number of number of English Professors were exceeded than the requirement of the College.

g. Needs no comments.

It is, therefore, most humbly prayed that on acceptance of this Written Statement appeal of the appellant may please be dismissed with costs.


Through:

  
Respondents No.4 & 5

(Ghulam Nabi Khan)  
Advocate,  
Supreme Court of Pakistan  
B-17, Haroon Mansion  
Khyber Bazar, Peshawar  
Cell # 0300-5845943

And

Dated: 13/06/2016

  
(Mian Tajammal Shah)  
Barrister, Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

6

IN RE:  
Service Appeal No. 154 / of 2016


Muhammad Tahir son of Feroz Bakht... Appellant

VERSUS

Additional Chief Secretary FATA and 5 others ... Respondents


AFFIDAVIT

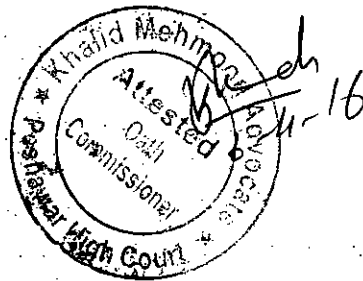
I, Gul Bacha, Principal Government Post Graduate College Khar Bajaur Agency (Respondent No.4), do hereby solemnly affirm and declare that the contents of the accompanying **Written Statement** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

  
Deponent

21106-4591122-7

IDENTIFIED BY

  
(Ghulam Nabi Khan)  
Advocate, Peshawar.



**MONTHLY STAFF STATEMENT OF GOVT: POSTGRADUAE COLLEGE KHAR BAJAUR AGENCY FOR AUGUST, 2015**

R-1

7

| S.No. | Name                    | Designation   | BPS | Mode of Appointment | Qualification. | D/O Birth | Domicile | CNIC          | D/O Ist: Appott: | D/O TAKING CHARGE IN THIS COLLEGE | Contact No: |
|-------|-------------------------|---------------|-----|---------------------|----------------|-----------|----------|---------------|------------------|-----------------------------------|-------------|
| 1     | Mr. Gul Badshah.        | PRINCIPAL A/P | 19  | Regular             | Islamiyat      | 01.05.58  | Bajaur.  | 2110645911227 | 04.01.87         | 01.07.06                          | 03009072782 |
| 2     | Mr. Muhammad Tahir.     | Asociat Prof. | 19  | Regular             | English        | 01.11.57  | Bajaur.  | 2110303901833 | 17.10.81         | 10.06.87                          | 03078055401 |
| 3     | Mr. Muslim Khan.        | Asociat Prof. | 19  | Regular             | Urdu           | 08.07.56  | Bajaur.  | 2110309217003 | 01.05.77         | 01.03.86                          | 03012815742 |
| 4     | Mr. Abdur Rahman        | Asociat Prof. | 19  | Regular             | Islamiyat      | 15.05.58  | Bajaur.  | 2110664675179 | 12.10.89         | 01.12.12                          | 03432476511 |
| 5     | Mr. Muhammad Nisar Khan | Asstt:Prof    | 18  | Regular             | Law            | 01.04.69  | Bajaur   | 2110309653031 | 16.05.94         | 14.09.11                          | 03008848483 |
| 6     | Mr. Muhd. Abdul Haq     | Asstt:Prof    | 18  | Regular             | Botany         | 18.05.71  | Bajaur   | 2110519861881 | 18.04.98         | 01.02.12                          | 03456032338 |
| 7     | Mr. Fazle-Subhan        | Asstt:Prof    | 18  | Regular             | Islamiyat      | 29.06.70  | Bajaur   | 2110625298845 | 22.10.98         | 20.11.13                          | 03068529781 |
| 8     | Mr. Muhd. Umar.         | Asstt:Prof    | 18  | Regular             | Economics      | 01.10.74  | Bajaur.  | 2110316745683 | 22.01.03         | 22.04.14                          | 03038800452 |
| 9     | Mr. Ziaul Haq.          | Asstt:Prof    | 18  | Regular.            | Urdu           | 03.04.74  | Bajaur   | 2110323007205 | 01.10.07         | 01.08.10                          | 03459155616 |
| 10    | Mr. Azeem Shah          | Asstt:Prof    | 18  | Regular             | Islamiyat      | 01.01.71  | Bajaur.  | 2110421538499 | 23.09.98         | 01.07.11                          | 03025968628 |
| 11    | Mr. Rahmanullah.        | Asstt:Prof    | 18  | Regular             | English.       | 07.03.80  | Bajaur   | 2110421617169 | 05.01.08         | 06.01.08                          | 03005985696 |
| 12    | Mr. Anwar Khitab        | Asstt:Prof    | 18  | Regular             | Mathematics    | 25.03.76  | Bajaur   | 1610215104393 | 11.10.07         | 01-03-15                          | 03449182152 |
| 13    | Mr. Abdur Rashid        | Lecturer      | 17  | Regular             | Chemistry      | 03.04.84  | Bajaur   | 2110681853631 | 31.03.11         | 01.04.11                          | 03449270311 |
| 14    | Mr. Aminul Haq          | Lecturer      | 17  | Regular             | Botany         | 01.04.83  | Bajaur   | 2110389935711 | 11.03.10         | 12.03.10                          | 03082870383 |
| 15    | Mr. Ashfaq Ahmad        | Lecturer      | 17  | Regular             | Zoology        | 09.02.77  | Bajaur   | 2110738794037 | 01.08.09         | 16.07.11                          | 03005700074 |
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| 18    | Mr. Muhammad Imran Khan | Lecturer/DPE  | 17  | Regular             | M. Sc (HPE)    | 08.02.84  | Bajaur   | 2110356237423 | 28.02.09         | 03.11.11                          | 03009534955 |
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| 20    | Mr. Fazal Wahed.        | Lecturer.     | 17  | Regular             | Physics        | 15.10.85  | Bajaur   | 2110319437831 | 24.11.11         | 24.11.11                          | 03038800979 |
| 21    | Mr. Iftikharud Din.     | Lecturer      | 17  | Regular             | Compt: Sc:     | 20.08.81  | Bajaur   | 2110323074125 | 24.11.11         | 17.07.13                          | 03038261411 |
| 22    | Mr. Rahimullah          | Lecturer.     | 17  | Regular             | English        | 06.04.82  | Bajaur   | 2110560792959 | 24.11.11         | 10.12.10                          | 03065171830 |
| 23    | Mr. Salim Jan           | Lecturer      | 17  | Regular             | English        | 01.01.81  | Bajaur   | 2110626716867 | 31.10.03         | 03.08.12                          | 03005171266 |
| 24    | Mr. Zakir Khan          | Lecturer      | 17  | Regular             | Pol: Science   | 13.08.85  | Bajaur   | 2110604694633 | 06.10.11         | 10.10.11                          | 03338895458 |
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| 26    | Mr. Muhammad Ismail     | Lecturer      | 17  | Regular             | Statistics     | 17.03.82  | Bajaur   | 1710211643769 | 06.10.11         | 08.10.11                          | 03469089610 |
| 27    | Mr. Said Badshah        | Lecturer      | 17  | Adhoc               | Pashto         | 10.03.77  | Bajaur   | 2110421782943 | 06.10.11         | 07.10.11                          | 03025474405 |
| 28    | Mr. Bakht Shah Zeb      | Lecturer      | 17  | Regular             | Physics        | 04.01.85  | Bajaur   | 2110386910849 | 06.10.11         | 10.10.11                          | 03085691863 |
| 29    | Mr. Safi Ullah          | Lecturer      | 17  | Adhoc               | Maths          | 05.01.88  | Bajaur   | 2110440509985 | 06.10.11         | 12.10.11                          | 03065747549 |
| 30    | Mr. Gul Abdul Majeed    | Lecturer      | 17  | Adhoc               | Law            | 02.04.85  | Bajaur   | 2110510854829 | 06.10.11         | 08.10.11                          | 03088437664 |
| 31    | Mr. Shafiq ur Rahman    | Lecturer      | 17  | Regular             | Economics      | 17.04.84  | Bajaur   | 2110381554225 | 03.08.12         | 01.11.14                          | 03005823456 |
| 32    | Mr. Abdul Amin          | Lecturer      | 17  | Regular             | Urdu           | 10.08.87  | Bajaur   | 2110209141867 | 26.05.14         | 01.03.215                         | 03009021120 |
| 33    | Mr. Usman Ghani         | Librarian.    | 17  | Regular             | M.Sc. Libray:  | 04.07.84  | Peshawar | 2250152674733 | 26.04.11         | 15.04.15                          | 03429074272 |
| 34    | Mr. Pasham Gul          | Supdt.        | 17  | Regular             | FA             | 14.04.56  | Mardan   | 1610111451737 | 01.01.80         | 25.03.14                          | 03125817920 |
| 35    | Mr. Gul Zada            | Lab: Assitt:  | 10  | Regular             | BA             | 11.11.55  | Bajaur   | 2110665266205 | 01.03.76         | 01.03.76                          | 0945613916  |
| 36    | Mr. Farooq Khan         | Lab: Assitt:  | 10  | Regular             | MA Pashto      | 05.05.59  | Bajaur   | 2110322949967 | 01.03.83         | 01.03.83                          | 03075710327 |
| 37    | Mr. Gul Rasool          | Senior Clerk  | 14  | Regular             | MA Urdu        | 02.04.70  | Bajaur   | 2110364991499 | 24.08.91         | 01.12.03                          | 03028078800 |
| 38    | Mr. Sajid Saeed         | Junior Clerk  | 11  | Regular             | B. SC:         | 05.03.90  | Bajaur   | 2110314372129 | 01.11.11         | 01.11.11                          | 03059298689 |
| 39    | Mr. Hasan Khan.         | Lab: Assitt:  | 07  | Regular             | FA             | 10.02.69  | Bajaur   | 2110622569653 | 01.10.89         | 01.10.89                          | 03453967009 |
| 40    | Mr. Burhan ud Din       | Lab: Assitt:  | 07  | Regular             | FA             | 01.04.95  | Bajaur   | 2110695360069 | 21.04.14         | 01.01.15                          | 03059071078 |
| 41    | Mr. Muhammad Ilyas      | Lab: Assitt:  | 07  | Regular             | B. Sc (Comp)   | 04.07.85  | Bajaur   | 2110395676869 | 21.04.14         | 01.01.15                          | 03029801078 |

DETAIL OF CLASS-IV

8

REGULAR SANCTIONED POST

| Name of post | BPS   | NO.OF POSTS | WORKED | VACANT | REMARKS   |
|--------------|-------|-------------|--------|--------|-----------|
| Aso:Prof     | 19    | 04          | 04     | 00     |           |
| Asst:Prof    | 18    | 08          | 08     | 00     |           |
| Lecturer     | 17    | 26          | 19     | 07     | Lecturers |
| DPE/Lib:     | 17    | 02          | 02     | 00     |           |
|              | Total | 40          | 33     | 07     |           |

| Name of post | BPS  | NO.OF POSTS | WORKED | VACANT | REMARKS |
|--------------|------|-------------|--------|--------|---------|
| N.Qasid      | 1&2  | 04          | 04     | 00     |         |
| Chowkidar    | 1&2  | 05          | 05     | 00     |         |
| Mali         | 02   | 03          | 03     | 00     |         |
| Bearer       | 01   | 02          | 02     | 00     |         |
| Behishti     | 02   | 04          | 04     | 00     |         |
| Sweeper      | 02   | 01          | 01     | 00     |         |
| Khakrob      | 02   | 01          | 01     | 00     |         |
| Cook         | 1&2  | 02          | 02     | 00     |         |
| Lab:Attd.    | 7&10 | 04          | 04     | 00     |         |
| Total        |      | 26          | 26     | 00     |         |

MINISTERIAL STAFF SANCTION.

| Name of post | No. of Posts | BPS   | Worked | Vacant |
|--------------|--------------|-------|--------|--------|
| Supdt.       | 1            | 17    | 01     | 00     |
| Asstt.       | 1            | 16    | 00     | 01     |
| S/Clerk      | 1            | 14    | 01     | 00     |
| J/Clerk      | 1            | 11    | 01     | 00     |
| L./Asstt:    | 5            | 07/10 | 05     | 00     |
| P.Imam       | 1            | 05    | 1      | 00     |
| Driver       | 2            | 05    | 2      | 00     |
| T.Optr.      | 1            | 04    | 1      | 00     |
| C.IV         | 26           | 01    | 26     | 00     |
| Total.       | 39           |       | 38     | 01     |


CLASS WISE ENROLMENT.

| Class                     | Medical | Engineering | Computer Engineering | Inter science | Arts | Total |
|---------------------------|---------|-------------|----------------------|---------------|------|-------|
| 1 <sup>st</sup> year      | 106     | 59          | 42                   | 68            | 199  | 480   |
| 1 <sup>st</sup> year Self | 192     | 46          | 14                   | ..            | ..   | 237   |
| 2 <sup>nd</sup> year      | 113     | 82          | 09                   | 52            | 157  | 413   |
| 2 <sup>nd</sup> year Self | 52      | 17          | 06                   | ..            | ..   | 252   |
| 3 <sup>rd</sup> year      | 102     | 89          | 13                   | ..            | 214  | 418   |
| 4 <sup>th</sup> year      | 79      | 62          | 18                   | 0             | 220  | 379   |
| 5 <sup>th</sup> year      | 0       | 0           | 0                    | 0             | 30   | 30    |
| 6 <sup>th</sup> year      | 00      | 00          | 00                   | 00            | 20   | 20    |
| Total.                    | 644     | 355         | 102                  | 120           | 840  | 2215  |

Endost: No: 533-34 dated 19/09 2015

Copy forwarded to the:

1. Director of Education (FATA) Secretariat warsak Road Peshawar
2. Agency Education Officer, Bajaur Agency at Khar

  
PRINCIPAL  
GPGC KHAR BAJAUR AGENCY



**Government Post Graduate College Khar Bajaur Agency**  
**General Time Table (Class/Subject Wise) 2014-15**

R-2 (9)

| Period S.no          | 1   | 2   | 3   | 4   | 5  | 6  | 7  | 8   |               |
|----------------------|---|---|---|---|--|--|--|---|---------------|
| Time                 | Summer  | 8:00 To 8:40  | 8:40 To 9:20  | 9:20 To 10:00   | 10:00 To 10:40   | 10:40 To 11:20   | 11:20 To 12:00   | 12:00 To 12:40  | 12:40 To 1:20 |
|                      | Fall  | 8:30 To 9:10  | 9:10 To 9:50  | 9:50 To 10:30   | 10:30 To 11:10   | 11:10 To 11:50   | 11:50 To 12:30   | 12:30 To 1:10   | 1:10 To 1:50  |
|                      | Winter  | 9:00 To 9:40  | 9:40 To 10:20   | 10:20 To 11:00  | 11:00 To 11:40   | 11:40 To 12:20   | 12:20 To 1:00  | 1:00 To 1:40  | 1:40 To 2:20  |
| 3 <sup>rd</sup> Year | <u>Botany</u><br>Paper-A<br>Inter-Lab<br><br><u>Is-Studies</u><br>R.no.4<br><br><u>Comp/Sc.</u><br>Lab                      | <u>Physics</u><br>Paper-A<br>Inter-Lab<br><u>Botany</u><br>Paper-B<br>Inter-Lab<br><u>Polt/Sc.</u><br>R.no.9<br><u>Pashto</u><br>R.no.8<br><u>Statistics</u><br>Lab<br><u>H.P.E</u> | <u>English</u><br>R.no.3<br><br><u>Math A</u><br>R.no.9<br><br><u>Zoology</u><br>Paper-A<br>Inter-Lab | <u>English</u><br><br><u>Structure</u><br>R.no.9<br><u>Math</u><br>R.no.7<br><br><u>Zoology</u><br>Paper-B<br>Inter-Lab   | <u>Chemistry</u><br>Paper-A<br>Inter-Lab<br><br><u>History</u><br>R.no.7<br><br><u>Urdu-Adv</u><br>R.no.5<br><br><u>H.P.E</u><br>R.no.6<br><u>Law</u><br><br><u>R.No.8</u> | <u>Chemistry</u><br>Paper-B<br>Inter-Lab<br><br><u>Physics</u><br>Paper-B<br>Inter-Lab<br><br><u>Economics</u><br>R.no.5 | <u>Is-Education</u><br>(Three Days)<br><u>Science Group</u><br>R.no.2<br><br><u>Arts Group</u><br>R.no.2 | <u>Practical Days</u><br><br><u>Zoology</u><br>Mon-Tue<br><br><u>Botany</u><br>Wed-Thu<br><br><u>Chemistry</u><br>Fri-Sat<br><br><u>Statistics</u><br>Mon-Thu |               |
| 4 <sup>th</sup> Year | <u>Zoology</u><br>Paper-c<br>Bsc-Lab<br><u>Physics</u><br>R.no.10<br><u>History</u><br>R.no.7<br><br><u>H.P.E</u><br>R.no.8 | <u>Zoology</u><br>Paper-D<br>Bsc-Lab<br><u>Math B</u><br>R.no.10<br><u>Economics</u><br>R.no.5<br><br><u>Polt/Sc.</u><br>R.no.12  | <u>Botany</u><br>Paper-C<br>Bsc-Lab<br><u>Is/Studies</u><br>R.no.10<br><u>Math</u><br>R.no.11         | <u>Botany</u><br>Paper-B<br>Bsc-Lab<br><u>Statistics</u><br>New Building<br><u>Urdu-Adv</u><br>R.no.11<br><br><u>Pashto</u><br>R.no.6<br><br><u>Law</u><br>R.No.8 | <u>Chemistry</u><br>Paper-C<br>Bsc-Lab<br><u>English</u><br>R.no.12<br><u>Physics</u><br>Lab   | <u>Chemistry</u><br>Paper-D<br>Bsc-Lab<br><u>Comp/Sc.</u><br>Lab<br><u>English</u><br>R.no.4                             | <u>Pak.Studies</u><br>(Three Days)<br><br>Examination Hall   | <u>Practical Days</u><br><br><u>Botany</u><br>Mon-Tue<br><br><u>Chemistry</u><br>Wed-Thu<br><br><u>Zoology</u><br>Fri-Sat<br><br><u>Statistics</u><br>Wed-Thu |               |

PRINCIPAL  
GPGC Khar Bajaur Agency.

**Government Post Graduate College Khar Bajaur Agency**  
**MA PREVIOUS/FINAL Time Table (Class/Subject Wise) 2015-16**

10

| Period S.no | 1                                       | 2   | 3  | 4   | 5  |                |
|-------------|---|---|--|---|--|----------------|
| Time        | Summer                                  | 8:00 To 8:50                                    | 8:50 To 9:40                                     | 9:40 To 10:30   | 10:30 To 11:20                               | 11:20 To 12:20 |
|             | Fall                                    | 8:50 To 9:40                                    | 9:40 To 10:30                                    | 10:30 To 11:20  | 11:20 To 12:10                               | 12:20 To 01:10 |
|             | Winter                                  | 9:40 To 10:30                                   | 10:30 To 11:20                                   | 11:20 To 12:10  | 12:10 To 01:00                               | 01:10 To 02:00 |
| MA-PREVIOUS | <u>Pakistan Affairs</u><br>Room No.A    | <u>Public Administration</u><br>Room No.A       | <u>Political Philosophy</u><br>Room No.A         | <u>Political System</u><br>Room No.A                      | <u>International Relation</u><br>Room No.A   |                |
| MA FINAL    | <u>Muslim World</u><br><u>Room No:B</u> | <u>Research Methodology</u><br><u>Room No:B</u> | <u>International Economy</u><br><u>Room No:B</u> | <u>Foreign Policy Of Major Powers</u><br><u>Room No:B</u> | <u>International Law</u><br><u>Room No:B</u> |                |

  
 CHAIRMAN  
 POLITICAL SCIENCE DEPTT.

  
 PRINCIPAL  
 GPGC KHAR BAJAUR AGENCY.

(W)

**Government Post Graduate College Khar Bajaur Agency**  
**General Time Table (Class/Subject Wise) 2015**

| Period S.no          |   | 1   | 2  | 3  | 4  | 5   | 6                      | 7   | 8             |
|----------------------|---|---|--|--|--|---|------------------------|---|---------------|
| Time                 | Summer  | 8:00 To 8:40                                  | 8:40 To 9:20   | 9:20 To 10:00  | 10:00 To 10:40   | 10:40 To 11:20  | 11:20 To 12:00         | 12:00 To 12:40  | 12:40 To 1:20 |
|                      | Fall  | 8:30 To 9:10                                  | 9:10 To 9:50   | 9:50 To 10:30  | 10:30 To 11:10   | 11:10 To 11:50  | 11:50 To 12:30         | 12:30 To 1:10   | 1:10 To 1:50  |
|                      | Winter  | 9:00 To 9:40                                  | 9:40 To 10:20  | 10:20 To 11:00   | 11:00 To 11:40   | 11:40 To 12:20  | 12:20 To 1:00          | 1:00 To 1:40  | 1:40 To 2:20  |
| 1 <sup>st</sup> Year | <b>Urdu</b>                                   | <b>English</b>                                | <b>Chemistry</b>   | <b>Physics</b>   | <b>Botany</b>  | <b>Is. Education</b>  | <b>Pashto</b>          | <b>Practical Days</b>   |               |
|                      | Sect.A-R.no.4<br>Sect.B-Hall                  | Pre-MedR.no.1<br>Pre-Eng R.no 2<br>Humty-Hall | Hall<br><b>Economics</b><br>R.no.5<br><b>Civics</b><br>R.no.8<br><b>H.P.E</b><br>R.no.6<br><b>Comp/Sc.</b><br>Sect.-A-Lab:<br>Sect.B-New<br>Building | Hall<br><b>State</b><br>New Building<br><b>Is/History</b><br>R.no.2  | Laboratory<br><b>Math</b><br>Sect.A R.No:1<br>Sect B R.No.2<br><br><b>Is/Studies</b><br>R.no.2 | (Three Days)<br>Sect.A-R.no.1<br>Sect.B-R.no.2<br>Sect.C-Hall     | R.no.10                | <b>Physics</b><br>Mon-Tue<br><br><b>Chemistry</b><br>Wed-Thu<br><br><b>Botany</b><br>Fri-Sat  |               |
| 2 <sup>nd</sup> Year | <b>English</b>                                | <b>Urdu</b>                                   | <b>Physics</b>   | <b>Chemistry</b>   | <b>Zoology</b>   | <b>Pashto</b>   | <b>Pak.Studies</b>     | <b>Practical Days</b>   |               |
|                      | Pre-MedR.no.1<br>Pre-Eng R.no 2<br>Humty-Hall | Sect.A-Office<br>Sect.B-R.no.4                | Sect.A-R.no.4<br><br><b>Statistics</b><br>R.No:7<br><b>Is-History</b><br>R.no.9  | Sect.A-R.no.4<br><br><b>Economics</b><br>R.no.5<br><b>Civics</b><br>R.no.1<br><b>H.P.E</b><br>R.no.8<br><b>Comp/Sc.</b><br>Lab | <br><br><b>Is/Studies</b><br>R.no.1  | R.no.11<br><br><b>Maths</b><br><br>Sect:A R.No.2<br>Sect:B R.No.3 | (Three Days)<br>R.No:4 | <b>Physics</b><br>Mon-Tue<br><br><b>Chemistry</b><br>Wed-Thu<br><br><b>Zoology</b><br>Fri-Sat |               |

PRINCIPAL  
GPGC Khar Bajaur Agency

OFFICE OF THE PRINCIPAL  
GPCC KHAR BAJAUR AGENCY

No: 506 dt: 20/08/2015

R-3

(12)



Allenhor  
Kaleshore  
Supra  
Colleges  
FATA

The Director of Education,  
(FATA) Secretariat Warsak  
Road Peshawar.

TO,

Subject: -

JUSTIFICATION FOR FILLING OF 07 VACANT POSTS

Memo:

Kindly refer to this office letter No.462 dated 23/07/2015 & telephonic message received by this office from Mr.Lal Sher superintendent colleges, FATA asking justification for filling the vacant post in Political science (ii) Physics (iii) Maths (iv) Computer Science (v) Chemistry.

Justification

MA Political science classes are taught in this college since 2006. After promotion of Prof.Gul Haider and Prof.Shah Zamin to BPS-19 & their posting at GDC Barkhatazai & GDC Nawagai in 2013, The undersigned hired 03 Teachers in Political Science for the academic session 2014-15 from open market to teach MA classes as there is only one lecturer Mr.Zakir Khan who can hardly teach to 1<sup>st</sup> year 2<sup>nd</sup> year 3<sup>rd</sup> year & 4<sup>th</sup> year. 05 subjects are taught in MA classes and each subject require one lecturer.

(1)

03 lecturers in political science

Justification.

GPCC Khar is a huge college in FATA where more than 2300 students are enrolled. The number of science students enrolled in each Inter Classes are more than 200 and 100 in Degree classes which can not be accommodated in one class room. After dividing in sections teacher will be required in the relevant subjects as the existing teaching staff can not meet the needs. It is stated that the demand already submitted to your good office is on need base and justified as the posts are already vacant and may please be filled according.

PRINCIPAL

GPCC KHAR BAJAUR AGENCY



OFFICE OF THE PRINCIPAL  
GPGC KHAR BAJAUR AGENCY

No: 234 dt: 30/08 2013

TO,

The Director of Education,  
(FATA) Secretariat Warsak  
Road Peshawar.

13

P-4

Subject: - APPROVAL FOR TEMPORARY APPOINTMENT OF HIRED LECTURERS/I.T LAB:INCHARGE OUT OF PUPIL FUND.

R/Sir,

Five post of lecturers has been created in Post Graduate College Khar Bajaur vide No.SO (F.II)FD/FA/SNE/2010-11/Vol-III dated Peshawar the 7<sup>th</sup> January, 2013.

The appointment of the stated lecturers is still awaited and this institute facing very hardship in the shortage of teaching staff.

The Director of Education Khyber Pakhtunkhwa on the approval of secretary Education Khyber Pkaktunkhwa vide No.108015-1608/N-4/placement of fund dated Peshawar the 30.08.2012 has empowered the Principal of colleges to hire/appoint Temporary Teaching staff after ex post facto sanction of your good self.

It is therefore requested that sanction of 05 lecturers and one I.T Lab: Incharge may please be accorded on the honorarium of Rs: 15000/- and 8000/- per month out of pupils fund respectively till the arrival of public service commission selectees.

Funds is available (Rs: 4361102/-) and can easily meet the expenditures involved in the payment of hired staff.

Detail of required teaching staff is as under.

1. Two Lecturers in Political Science for Teaching to M.A Classes.
2. One lecturer in Computer Science.
3. One lecturer in Mathematics.
4. One lecturer in Physics.
5. One I.T Lab: Incharge.

Co-operation in the matter will be thanked.

Endost:No: \_\_\_\_\_ dated \_\_\_\_\_ /2013

Copy forwarded to the:

1. Political Agent Bajaur Agency at Khar for further necessary action please.

  
PRINCIPAL  
GPGC KHAR BAJAUR AGENCY.

  
PRINCIPAL  
GPGC KHAR BAJAUR AGENCY.



OFFICE OF THE PRINCIPAL  
GPGC KHAR BAJAUR AGENCY.

No: 196 dt: 18/8 2014

TO,

The Director of Education,  
(FATA) Secretariat Warsak  
Road Peshawar.

(14)

Subject: - FILLING OF VACANT POSTS.

Memo:

It is stated in your honour that 08 numbers of Posts in various subjects are lying vacant since long due to promotion and transfer of lecturers/Professors.

This institute facing a lot of difficulties and hardships due to shortage of teaching Staff.

It is therefore requested that the vacant posts may please be filled up by adjusting them in the following subject.


- |                        |    |
|------------------------|----|
| 1. Political Science   | 03 |
| 2. Mathematics         | 02 |
| 03. Physics.           | 01 |
| 04. Computer Science   | 01 |
| 05. Librarian/Lecturer | 01 |


Monthly staff Statement is hereby submitted for ready reference.

Endost: No: 197-98 dated 18/8 /2014

Copy forwarded to the:

1. Director Higher Education Khyber Pakhtunkhwa Peshawar.
2. Political Agent Bajaur Agency.

  
PRINCIPAL  
GPGC KHAR BAJAUR AGENCY

  
PRINCIPAL  
GPGC KHAR BAJAUR AGENCY

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE  
TRIBUNAL, PESHAWAR**

Service Appeal No. 154/2016

Muhammad Tahir.....(Appellant)

**V E R S U S**

The Additional Chief Secretary FATA and others

.....(Respondents)

**PARA-WISE REJOINDER OF COMMENT  
FILED BY RESPONDENTS NO. 1, 2 AND  
6.**

**Respectfully Sheweth:**

**Reply to Preliminary Objections:**

1. In reply to Para 1 of the comments the appellant has a good prima facie case.
2. Para 2 of the comments is incorrect on the appellant has come to this Hon'ble Court with clean hands.
3. Para No. 3 of the comments is incorrect.
4. Para No. 4 of the comments is incorrect.
5. Para No. 5 of the comments is incorrect.
6. Para No. 6 of the comments is incorrect.

**REPLY ON FACTS:**

1. Needs no reply.
2. Needs No reply.
3. In reply to Para 2 of the comments on facts no doubt the appellant has completed his tenure on the said post but for the reason that there was no substitute available for that period being a remote area. Moreover, the appellant is domicile holder of the same area and the government policy is to facilitate the government servant and stationed him in the same area of the domicile, so Para No. 3 is incorrect and denied.
4. Para No. 4 needs no reply.
5. Para No. 5 needs no reply.
6. Para No. 6 needs no reply.

**REPLY ON GROUNDS:**

- A. Para A of the grounds is incorrect on the said order was not in public interest while it was based on personal grudges/ like and dislike.
- B. Para B of the grounds is also incorrect as the said transfer order was issued on the recommendation of



respondent No. 4 due to his personal like and dislike.

- C. Para C is also incorrect as the applicant being English lecturers substituted by Political Science Professor which is against the law .
- D. Para D of the comments is also incorrect as the said new posting station is far away from appellants residence.
- E. Para E needs no comments/ reply.
- F. Para F is also incorrect.
- G. Para G also needs no reply.

In light of the above mentioned facts in law, the appeal of the appellant may kindly be accepted as prayed for.



Appellant

Through



**Zahanat Ullah**  
Advocates High Court,  
Peshawar.

Dated: 13/07/2017

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE  
TRIBUNAL, PESHAWAR**

Service Appeal No. 154/2016

Muhammad Tahir.....(Appellant)

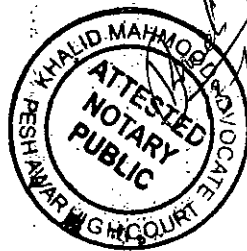
**V E R S U S**

The Additional Chief Secretary FATA and others

.....(Respondents)

**AFFIDAVIT**

I, Muhammad Tahir S/o Feroz Bakht R/o Degree College,  
P.O. Khar Tehsil Khar, District Bajaur Agency, do hereby  
solemnly affirm and declare on oath that the contents of the  
**Reply/ Rejoinder** are true and correct to the best of my  
knowledge and belief and nothing has been concealed from  
this Hon'ble Tribunal.



  
**DEPONENT**

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE  
TRIBUNAL, PESHAWAR**

Service Appeal No. 154/2016

Muhammad Tahir.....(Appellant)

**V E R S U S**

The Additional Chief Secretary FATA and others

.....(Respondents)

**PARA-WISE REJOINDER OF COMMENT  
FILED BY RESPONDENTS NO. 4 AND 5.**

**Respectfully Sheweth:**

**Reply to Preliminary Objections:**

1. In reply to Para 1 of the comments the appellant has a good prima facie case.
2. Para No. 2 of the comments is incorrect.
3. Para No. 3 of the comments is incorrect, as the appellant served in the said college for the reason that there was no substitute of the appellant during this entire period nor anyone was willing to perform his duties in such a remote area, so it was the need/ requirement of the department.

4. Para No. 4 is incorrect as the said place/ station is for way form appellant resident. Moreover appellant is going to be retired in October of this year, so according to ESTA Code posting and transfer policy, he may be stationed at his own choice.
5. Para No. 5 is wrong, hence denied.

**REPLY ON FACTS:**

1. Para No. 1 needs no reply.
2. Para No. 2 needs no reply.
3. Para No. 3 is wrong and not based on facts, hence denied.
4. Para No. 4 is also incorrect and hence denied.
5. Para No. 5 needs no reply.
6. Para No. 6 is also needs no reply.

**REPLY ON GROUNDS:**

- A. Para A of the grounds is incorrect hence denied as a Political Science Professor cannot be a substitute to an English Professor, moreover the workload of English Class is more an compared to Political Science.

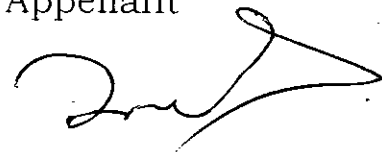
- B. Para B of the grounds is also incorrect, hence denied and the said para has already been replied/ explained in the earlier paras.
- C. Para C is also incorrect and has been replied in the earlier paras.
- D. Para D is also incorrect and not based on facts.
- E. Para E is also incorrect as the impugned transfer order was based on personal like and dislike of the respondents and was not in public interest.
- F. Para F is also incorrect as has been explained in the earlier para.
- G. Para G needs no reply.

It is, therefore, humbly requested that the appeal of the appellant may kindly be accepted as prayed in the appeal.



Appellant

Through



**Zahanat Ullah**

Advocates High Court,  
Peshawar.

Dated: 13/07/2017

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE  
TRIBUNAL, PESHAWAR**

Service Appeal No. 154/2016

Muhammad Tahir.....(Appellant)

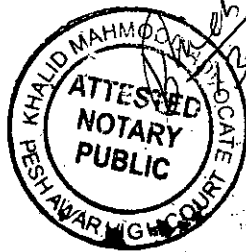
**V E R S U S**

The Additional Chief Secretary FATA and others

.....(Respondents)

**AFFIDAVIT**

I, Muhammad Tahir S/o Feroz Bakht R/o Degree College,  
P.O. Khar Tehsil Khar, District Bajaur Agency, do hereby  
solemnly affirm and declare on oath that the contents of the  
**Reply/ Rejoinder** are true and correct to the best of my  
knowledge and belief and nothing has been concealed from  
this Hon'ble Tribunal.



**DEPONENT**

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 1240 /ST

Dated 5 / 5 / 2017

To


The Additional Chief Secretary FATA Secretariat Warsak Road,  
Government of Khyber Pakhtunkhwa,  
Peshawar.

Subject: -

JUDGMENT

I am directed to forward herewith a certified copy of Judgement dated 3.5.2017 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.