


impugned transfer order is liable to be set aside.

A careful perusal of the case-law referred to by the learned counsel for the appellant would suggest that the transfer orders in the said cases were politically motivated and made on the recommendations of the Ministers while no such element is evident from the impugned transfer order. Learned counsel for the appellant has failed to convincingly argue that the impugned transfer order was either illegal or the result of victimization or personal vendetta or exercise of excess of authority.

For the above reasons, the appeal is dismissed in limine. File be consigned to the record.

ANNOUNCED

16.02.2015


(Muhammad Azim Khan Afridi)
Chairman
Camp Court Abbottabad

16.02.15

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CAMP COURT ABBOTTABAD

Appeal No. 106/2015

(Hamad Ejaz-vs-Govt. of KPK through Secretary Education etc)

16.02.2015

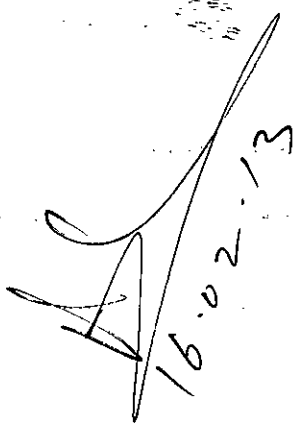
JUDGMENT

MUHAMMAD AZIM KHAN AFRIDI, CHAIRMAN: Appellant

[with counsel present. Preliminary arguments heard and record perused.

Appellant Hamad Ejaz has preferred the instant appeal under section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 challenging therein his transfer order, 17.01.2015 and 31.01.2015 passed by District Education Officer (M) Haripur on the ground that the same are illegal, void ab-initio and against the principle of natural justice as well as fundamental rights of the appellant.

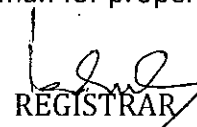

Learned counsel for the appellant, during the course of arguments, pleaded that the impugned transfer order was the result of political pressure of local MPA. That the appellant was performing his duty to the satisfaction of his high-ups. He also referred to letter dated 17.01.2015 according to which the Principal of the School has requested the District Education Officer, Haripur not to shift the appellant from the said school. Learned counsel for the appellant also placed reliance on case-law reported as 2005 SCMR 17 (Supreme Court of Pakistan) and 2007 SCMR 599 (Supreme Court of Pakistan) and argued that the


16.02.15

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 106 / 2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	12.02.2015	<p>The appeal of Mr. Hamad Ejaz presented today by Mr. Hamayun Khan Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>16-02-2015</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2	13-2-15	

BEFORE THE SERVICE TRIBUNAL KHYBPER
PAKHTUNKHWA PESHAWAR

Service Appeal No. 106 /2015

Hamad Ejaz son of Ejaz Ahmad, Physical Education Teacher (PET) Govt. Higher Secondary School No. 1, City Haripur, District Haripur.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

INDEX

S.#	Description	Page No.	Annexure
1.	Service Appeal	1 to 7	
2.	Suspension application alongwith affidavit	8 to 9	
3.	Copy of judgment	10-12	"A"
4.	Copy of the posting order	13	"B"
5.	Copy of the good performance certificate	14-17	"C"
6.	Copy of the attendance register	18-19	"D"
7.	Copy of letter dated 17/01/2015	20	"E"
8.	Copy of order dated 17/01/2015	21	"F"
9.	Copy of appeal and order dated 30/01/2015	22-23	"G"
10.	Wakalatnama.		


...APPELLANT

Through

Dated: 10/2/2015


(HAMAYUN KHAN)

Advocates High Court Abbottabad
Office No. 4, Hayat Sherpao Lawyer
Plaza, Kutchery Compound, Abbottabad
Cell No. 0345-9557912

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

H.W.F. Province
Service Tribunal
Diary No. 106
Dated 12-2-15

Service Appeal No. 106 /2015

Homad Ejaz son of Ejaz Ahmad, Physical Education Teacher (PET) Govt.
Higher Secondary School No. 1, City Haripur, District Haripur.

...APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male) Haripur.

...RESPONDENTS

APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974
AGAINST THE IMPUGNED TRANSFER ORDER DATED
17/01/2015 ENDST: NO. 432-34 AND ORDER DATED
31/01/2015 NO. 757 PASSED BY RESPONDENT NO. 3,
WHICH IS ILLEGAL, AB-INITIO, VOID, AGAINST THE
LAW, PRINCIPAL OF NATURAL JUSTICE AND
AGAINST THE FUNDAMENTAL RIGHTS OF
APPELLANT AND LIABLE TO BE SET-ASIDE.

=====

Filed to-day
12/2/15
Registration

PRAYER: ON ACCEPTANCE OF THIS APPEAL, IMPUGNED TRANSFER ORDERS DATED 17/01/2015 AND 31/01/2015 MAY KINDLY BE DECLARED ILLEGAL, AGAINST THE LAW FACT AND CIRCUMSTANCE OF THE CASE, ANY OTHER RELIEF WHICH THIS HONOURABLE COURT MAY DEEMS FIT AND PROPER IN THE CIRCUMSTANCE OF THE CASE MAY BE GRANTED.

=====

Respectfully Sheweth: -

Brief facts giving rise to the instant appeal are as under:-

1. That the appellant was appointed as Physical Education Teacher (PET) in BPS-15 in education department on 05/12/2006.
2. That, appellant thereafter was posted and transferred in GMS Swar Maira to GMS Kangra Colony, Haripur and from there he was transferred to GCM HSS No. 1 Haripur and thereafter he was transferred to GHS Slam Khad in a very short time.
3. That, the appellant was transferred and posted in GHS Slam Khad Haripur dated 17/11/2011 on the political basis, due to pressure of local MPA.

4. That, appellant challenged the transferred order dated 17/11/2011 before Khyber Pakhtunkhwa Service Tribunal Peshawar and after completion of all proceeding both the council argued the appeal after arguments this Honourable Tribunal accepted the appeal of appellant through judgment dated 17/06/2012 and order dated 17/11/2011 was declared illegal. Copy of judgment is annexed as Annexure "A".
5. That, after judgment dated 17/06/2012, the appellant was posted in GCMHSS No. 1 Haripur in the light of judgment dated 17/06/2012. Copy of the posting order is annexed as Annexure "B".
6. That, thereafter appellant took the charge in the school as PET and tried his level best to maintain the discipline and best environment for the students of the school and uplift their education, performance as well as their personality. Copy of the good performance certificate is annexed as Annexure "C".
7. That, after incident of Army Public School Peshawar duty for the safety measurement for the said school and children has been deputed to appellant and he performed his duty well within two months of

holidays. Copy of the attendance register is annexed as annexure "D".

8. That, again on the political basis, appellant was harass by local political figure MPA and his group agent and he was asked so many time that he is not from his constituency, so he cannot performed duties in the said school and also he was harass by his high ups and respondent No. 3 was pressurizing him for his posting from the said school but the principal respondent of the said school issued a letter No. 988 dated 17/01/2015 to the respondent No. 3 for not disturbing / torturing his duty with full devotion and liabilities, in the current uncertain situation of the province and his posting is best interest of students in the present school. Copy of letter dated 17/01/2015 is annexed as Annexure "E".

9. That, inspite of the crucial situation and demand of the principal, appellant was transferred from GCMHSS No. 1 Haripur to GMS Mankrai vide impugned order No. 432-34 dated 17/01/2015. Copy of order dated 17/01/2015 is annexed as Annexure "F".

10. That, the appellant preferred appeal against the impugned order before the respondents for with drawl of their illegal order dated 17/01/2015, but due to

political pressure respondents refused to do so, and mean while on 03/02/2015, appellant came to know the respondent No. 3 rejected the appeal of appellant on 30/01/2015, but with any merit and law. Copy of appeal and order dated 30/01/2015 are annexed as Annexure "G".

11. That, feeling aggrieved of the afore stated orders and situation, the appellant has come to this Honourable Court against the orders passed by respondent No. 3, filing the appeal before this court, inter-alia, on the following amongst many others:-

GROUNDS:-

- a. That act of respondents without lawful authority, malafide, arbitrary, without jurisdiction, against natural justice, hence liable to be set-aside.
- b. That, it is against the law, rules and natural justice that the local residents are interfering in the service of the appellant and or doing them best to creates problems in performance of duty of appellant, which is not allowed in the eye of law.

- c. That, one cannot be transferred or posted before completing of three years tenure, hence order dated 17/01/2015 is liable to be set-aside.
- d. That, no body cannot be stopped from performing his lawful duty, and order dated 17/01/2015 against the fundamental rights of the appellant, hence liable to be set-aside.
- e. That, the acts of the respondents is totally against the constitutional guaranteed rights of the appellant.
- f. That, the act of the respondents is result of malafide, arbitrary, perverse, illegal, without merits, hence liable to be set-aside.
- g. That, appellant has been penalized again and again on the political pressure by the respondents.
- h. That, despite that Principal GCMHSS No. 1 clearly mention in his letter to respondent No. 3 that appellant is very competent, punctual, hard worker staff of the school and he is required for

good administration of the school, hence impugned order is liable to be set-aside.

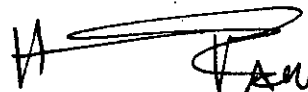
- i. That, other points would be argued at the time of arguments.
- j. That, addresses of the parties is given correctly in the heading of appeal.

It is, therefore, respectfully prayed that, on acceptance of this appeal, impugned transfer orders dated 17/01/2015 and 31/01/2015 may kindly be declared illegal, against the law fact and circumstance of the case, any other relief which this Honourable court may deems fit and proper in the circumstance of the case may be granted.


...APPELLANT

Dated: 10/2 /2015

Through;



(HAMAYUN KHAN)

Advocates High Court Abbottabad
Office No. 4, Hayat Sherpao Lawyer
Plaza, Kutchery Compound, Abbottabad
Cell No. 0345-9557912

VERIFICATION: -

Verified on oath that the contents of forgoing writ petition are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court


...APPELLANT

BEFORE THE SERVICE TRIBUNAL KHYBPER
PAKHTUNKHWA PESHAWAR

CM No. _____/2015

IN

Service Appeal No. _____/2015

Hamid Ejaz son of Ejaz Ahmad, Physical Education Teacher (PET) Govt. Higher Secondary School No. 1, City Haripur, District Haripur.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

APPLICATION FOR SUSPENSION OF OPERATION OF
 IMPUGNED ORDER DATED 17/01/2015, ENDST NO. 432-34
 PASSED BY RESPONDENT NO. 3 TILL FINAL DISPOSAL OF
 TITLED APPEAL.

Respectfully Sheweth: -

1. That the titled appeal is being filed before this Honourable Court and contents of this application may please be read as an integral part of the same.
2. That the appellant has brought good prima facie case and balance of convenience also tilts in his favour.

3. That if the operation of impugned order dated 17/01/2015 is not suspended, the appellant would suffer irreparable loss and purpose of filing of titled appeal will become infructuous.

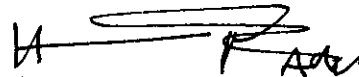
It is, therefore, humbly prayed that the operation of impugned order dated 17/01/2015 Endst No. 432-34 may kindly be suspended and till final disposal of titled appeal.



...APPELLANT/ PETITIONER

Through

Dated: 10/2 /2015



(HAMAYUN KHAN)

Advocates High Court Abbottabad
Office No. 4, Hayat Sherpao Lawyer
Plaza, Kutchery Compound, Abbottabad
Cell No. 0345-9557912

AFFIDAVIT:-

I, Ahmad Ejaz son of Ejaz Ahmad, Physical Education Teacher (PET) Govt. Higher Secondary School No. 1, City Haripur, District Haripur, do hereby affirm and declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.



DEPONENT

Identified by:



(HAMAYUN KHAN)
Advocate High Court, Abbottabad

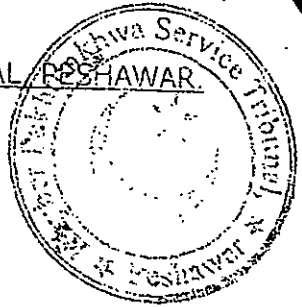


10

Annex "A"



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.



Appeal No. 1811/2011

Date of Institution.... 22.11.2011
Date of Decision. 19.06.2012

Mr. Hamad Ijaz, PET, GHS Salam Khand,
Haripur.

(Appellant)

Attorney
K. H. H. ELA MUGHAL
Advocate High Court
Abbottabad

VERSUS

1. The District Coordination Officer, Haripur.
2. The EDO (E&SE), Haripur.

(Respondents)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974, AGAINST THE ORDER DATED 13.10.2011 WHEREBY THE APPELLANT HAS BEEN TRANSFERRED PREMATURELY AND DUE TO POLITICAL INTERFERENCE AND AGAINST THE ORDER DATED 17.11.2011 WHEREBY THE APPEAL OF THE APPELLANT HAS BEEN REJECTED.

MR. MUHAMMAD ASIF YOUSAFZAI,
Advocate

For appellant

MR. SHERAFGAN KHATTAK,
Addl. Advocate General

For respondents.

MR. NOOR ALI KHAN,
MR. SULTAN MAHMOOD KHATTAK,

MEMBER
MEMBER.

JUDGMENT

NOOR ALI KHAN, MEMBER:-

This appeal has been filed by Hamad Ijaz, the appellant under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 against the order dated 13.10.2011 whereby he has been transferred to GHS Salam Khand and against the order dated 17.11.2011 whereby his departmental appeal has been rejected. It has been prayed that on acceptance of the appeal, the impugned orders may be set aside.

2. Brief facts as averred in the memo: of appeal are that the appellant was posted as PET at GCMHSS No. 1 Haripur in April, 2009. The principal wrote a complaint to the EDO(E&SE) Haripur on 18.5.2011 regarding conduct and misbehaviour of Muhammad Shafiq, SET. An enquiry was conducted and Muhammad Shafiq, SET was recommended for transfer from the said school. The appellant being eye witness in the said enquiry was also transferred to GHS Salam

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Attested
my



Khund on administrative grounds vide order dated 5.7.2011. The appellant filed departmental appeal before the DCO, Haripur. Fresh enquiry was conducted and on the recommendations of the enquiry officer, transfer order dated 5.7.2011 has been cancelled, vide order dated 22.8.2011. On 14.9.2011, the Minister for Higher Education wrote a letter to Chief Minister for directing the DCO, Haripur for withdrawal of order dated 22.8.2011. The Chief Minister sent the request to Commissioner Hazara Division on 19.9.2011 for necessary action and report. Resultantly, the DCO, vide letter dated 12.10.2011, withdrew inquiry proceedings and Muhammad Shafiq, SET and Raja Muhammad D.M were directed to report to EDO (E&SE) Haripur. Vide impugned order dated 13.10.2011, office order dated 22.8.2011 was cancelled and the appellant was transferred to GHS Salam Khund. Feeling aggrieved, the appellant filed departmental appeal on 28.10.2011, which was rejected on 17.11.2010, hence this appeal.

3. The appeal was admitted to regular hearing on 2.1.2012 and notices were issued to the respondents. The respondents have filed their joint written reply and contested the appeal. The appellant also filed rejoinder in rebuttal.

4. Arguments heard and record perused.

5. The learned counsel for the appellant argued that the appellant was never involved in the matter. In the departmental proceedings against Muhammad Shafiq, SET, he was only eye witness but he has been transferred to GHS Salam Khund on administrative ground and punished for the fault of others. He further argued that the authority had not applied his independent mind and the impugned order is based on political pressure which is evident from the D.O letter dated 14.9.2011 of the Minister for Higher Education to the Chief Minister, Khyber Pakhtunkhwa. He stated that the impugned order is premature and against the policy of the provincial government. He requested that the appeal may be accepted as prayed for.

6. The learned AAG argued that there was dispute between the groups of teachers, due to which the innocent students were suffering. A detailed enquiry was conducted in the matter, the appellant was proved involved in the tussle and on the basis of enquiry report, he has been transferred to GHS Salam Khund on administrative ground. The appellant tortured a student of Class 9th and that is why his father issued a legal notice to him. He requested that the appeal may be dismissed.

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

ATTORNEY GENERAL

Accepted
[Signature]



7. The Tribunal observes that the departmental authority had not applied his independent mind and the impugned order is political interference, which is evident from D.O letter of Minister for Higher Education. The perusal of record would show that complaint of Principal, GCMHSS No. 1 dated 17.6.2011 was directly against Muhammad Shafiq, SST and his role in the enquiry was only of the eye witness. It was not proved that the appellant was involved in anti institutional and subversive activities. So far as physical torture of Safeer Ahmad, student of class 9th is concerned, no enquiry has been conducted against the appellant on the said allegations and he could not be transferred on administrative ground. Moreover, no reason whatsoever recorded for rejection of departmental appeal of the appellant, which is against the spirit of Section 24-A of General Clauses Act 1897. The Tribunal agrees with the arguments advanced by the learned counsel for the appellant. If there is any case/complaint of parents against him, it could be thrashed out through regular enquiry strictly according to rules, but transfer is not a punishment for mis-conduct.

8. In view of the above, the appeal is accepted and the impugned orders dated 13.10.2011 and 17.11.2011 to the extent of appellant are set aside. Parties are left to bear their own costs. File be consigned to the record.

ANNOUNCED
19.6.2012.

(SULTAN MAHMOOD KHATTAK)
MEMBER

(NOOR ALI KHAN)
MEMBER

Certified to be true copy

Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Date of Presentation of Application 16/7/12
 Amount of Affidavit 1200
 Stamp Fee 1200
 Court Fee 200
 Total 1400 ✓
 Date of Completion of Case 16-7-12
 Date of Copying 16-7-12

Accepted

13

Amman

B⁶ 9⁹

OFFICE OF THE EXECUTIVE DISTRICT OFFICER

PH No. 0995-610178, 610268

Order

Consequent upon the Judgment of Honourable Service Tribunal Peshawar dated 19.06.2012, this office order issued under Endst: No- 13807-902 dated 13.10.2011 in r/o Mr. Amad Ijaz PET GCMHSS No-1 Haripur is hereby cancelled with immediate effect, and he is directed to report concerned Principal.

Note: -

1. Charge report should be subjected to all concerned.
2. No TA/DA is allowed.


-----sd/-----
Executive District Officer
Elementary & Secondary Education
Haripur

Endst: No. 7182 - 86 /

Dated: 19 / 07 / 2012

Cc:

1. Registrar Honourable Service Tribunal Peshawar with reference the Judgment dated 19.06.2012, for information.
2. District Coordination Officer Haripur.
3. The Senior District Accounts Officer Haripur.
4. The Principal / Headmaster concerned.
5. Teacher Concerned.
6. Office record file.


District Officer (Male)
Elementary & Secondary Education
Haripur

Adhered
H [Signature] AR

14

Annex 'C'




Elementary & Secondary Education
&
National Commission for Human Development
District Haripur

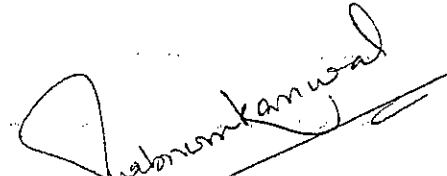
Certificate of Appreciation

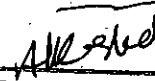
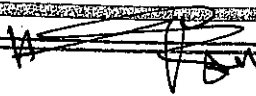
is hereby granted to:

Hamrad Ajaz President PET,

for outstanding performance & lasting contribution in
enrollment campaign


District Education Officer
(M) Haripur


District General Manager
NCHD Haripur

الف
اعلان

Alif
Ailaan

15

اساتذہ کی عظمت کو سلام



National Commission
for Human Development

Elementary & Secondary Education Department Haripur



Best Teacher Certificate

Is awarded to Mr. Amad Qiaz Desig: PET

School GEMHSS No 1 HARIPUR in recognition of his

services for the education Department specially for uplifting of the Quality Education in the
District Haripur on the occasion of

"Salam Teacher Day"

5th Oct 2013


Umar Khan Kundi

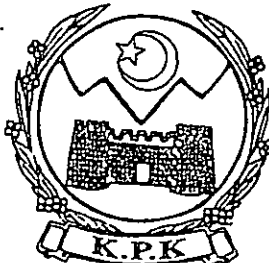
District Education
Officer Haripur

Attested






EXECUTIVE DISTRICT OFFICER ELEMENTARY & SECONDRY EDU: HARIPUR



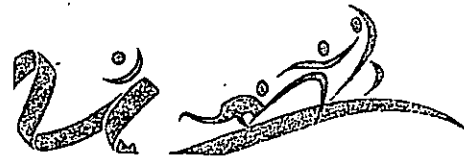
COMMENDATORY/BEST PERFORMANCE CERTIFICATE

This Certificate is awarded to Mr / Mst / Miss Amad Ijaz (P.E.T)
 Govt High School No.1 Haripur. for his best / Excellent Performance during the
 year 2010 - 2011 in the field of Academic / Sportive Administrative / Over all activities.

M
 MUHAMMAD RAFIQUE KHATTAK
 Executive District Officer
 Elementary & Secondary Education
 Haripur

Amad Ijaz


17



PROVINCIAL GOVT HIGH/HIGHER SECONDARY SCHOOLS
TOURNAMENT 2013 - KHYBER PAKHTUNKHWA HARIPUR

Certificate of Appreciation

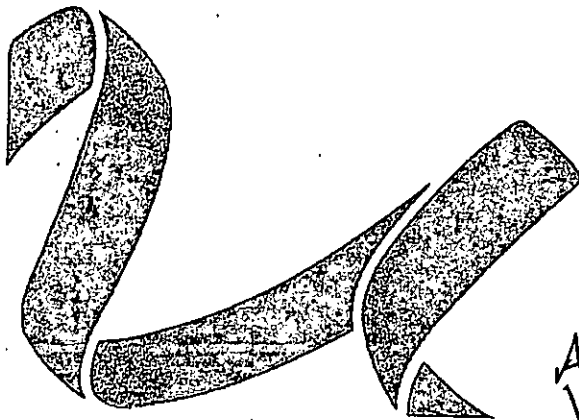
The Tournament Committee is pleased to award this certificate to

Mr. Imad Qazi GHS/GHSS NO 1 HARIPUR

The proficiency, being EMPIRE in CRICKET during the

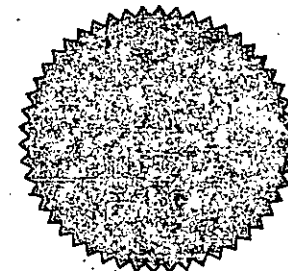
Provincial Govt. Secondary/Higher Secondary Schools Tournament 2013

Khyber Pakhtunkhwa, Haripur, is recognized and highly appreciated.



Dr Tariq Mahmood Khan

Dr Tariq Mahmood Khan
General Secretary, Provincial Tournament Committee
& Principal Govt Centennial Model High School
Turbela Township - Haripur



Attested

Muhammad Rafiq Khatkhat
Muhammad Rafiq Khatkhat
President, Provincial Tournament Committee
& Director Elementary & Secondary Education
Khyber Pakhtunkhwa

TEACHER'S ATTENDANCE REGISTER **Anneen D**

For the month of Dec 2014

No. 45

No. 46

No. 47

No. 48

Name: سابقہ فہرست سپتیاں ادرہ عادہ اچازہ عبر ال شہدہ

Designation: SPET SPET PET T.T

Dates	No. 45				No. 46				No. 47				No. 48			
	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.
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7					8:1	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
8	8:1	A-Z	21	A-Z	8:15	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
9	8:1	A-Z	21	A-Z	8:15	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
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12	8:1	A-Z	21	A-Z	8:15	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
13	8:1	A-Z	21	A-Z	8:15	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
14					8:1	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
15	8:1	A-Z	21	A-Z	8:15	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
16	8:1	A-Z	21	A-Z	8:15	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
17	8:1	A-Z	21	A-Z	8:15	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
18					8:1	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
19					8:1	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
20					8:1	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
21					8:1	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
22					8:1	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
23					8:1	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
24					8:1	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
25					8:1	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
26					8:1	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
27					8:1	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
28					8:1	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
29					8:1	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
30					8:1	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z
31					8:1	A-Z	21	A-Z	7:30	A-Z	21	A-Z	8:30	A-Z	21	A-Z

School Secured due

STATEMENT OF LEAVES TAKEN

his month	Sick	Casual	Pri	Total	Sick	Casual	Pri	Total	Sick	Casual	Pri	Total	Sick	Casual	Pri	Total
			1	15		16		1		14	15					
Previous										03	03			1	10	11
Total																

Dated: 31-12-2014

Model Book Centre, Urdu Bazar Lahore.

Headmistress/Headmaster

[Signature]

Date

Attested
[Signature]

TEACHER'S ATTENDANCE REGISTER



No. 45 For the month of Jan 2015
 No. 46 No. 47 No. 48

Name: فاطمہ ظفر انصاف قادری عماد اجمان عبد الرشید
 Designation: SPET SPET

Dates	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.
1																
2									8.00	(120)	4.00	(120)				
3									8.00	(120)	4.00	(120)				
4									8.00	(120)	4.00	(120)				
5									8.00	(120)	4.00	(120)				
6									8.00	(120)	4.00	(120)				
7									8.00	(120)	4.00	(120)				
8									8.00	(120)	4.00	(120)				
9	8L	A-2	4L	A-2	8L	(120)	4L	(120)	8.00	(120)	4.00	(120)				
10	8L	A-2	4L	A-2	8L	(120)	4L	(120)	8.00	(120)	4.00	(120)				
11	8L	A-2	4L	A-2	8L	(120)	4L	(120)	8.00	(120)	4.00	(120)				
12	8L	A-2	4L	A-2	8L	(120)	4L	(120)	8.00	(120)	4.00	(120)				
13									8.00	(120)	4.00	(120)				
14									8.00	(120)	4.00	(120)				
15	8L	A-2	2L	A-2	8L	(120)	2L	(120)	8.00	(120)	4.00	(120)				
16	8L	A-2	12L	A-2	8L	(120)	12L	(120)	8.00	(120)	4.00	(120)				
17	8L	A-2	2L	A-2	8L	(120)	2L	(120)	8.00	(120)	4.00	(120)				
18									8.00	(120)	4.00	(120)				
19	8L	A-2	2L	A-2	8L	(120)	2L	(120)	8.00	(120)	4.00	(120)				
20									8.00	(120)	4.00	(120)				
21	8L	A-2	2L	A-2	8L	(120)	2L	(120)	8.00	(120)	4.00	(120)				
22	8L	A-2	2L	A-2	8L	(120)	2L	(120)	8.00	(120)	4.00	(120)				
23	8L	A-2	11.30	A-2	8L	(120)	12L	(120)	8.00	(120)	4.00	(120)				
24	8L	A-2			7/45	12L			8.00	(120)	4.00	(120)				
25									8.00	(120)	4.00	(120)				
26																
27																
28																
29																
30																
31																

STATEMENT OF LEAVES TAKEN.

This month	Sick	Casual	Pri.	Total	Sick	Casual	Pri.	Total	Sick	Casual	Pri.	Total	Sick	Casual	Pri.	Total	
Previous																	
Total																	

Dated: _____
 Master Book Centre, Urdu Bazar Lahore. Headmistress/Headmaster

Attested

20

Amn 66 E 21

OFFICE OF THE PRINCIPAL Govt. HIGHER SECONDARY SCHOOL
NO-1 HARIPUR

No: 488

Dated: 12-01-2015

To,
The district Education
Officer Haripur

Subject: REQUEST FOR NOT SHIFTING THE COMPETENT TEACHER (PET)

Memo:

Kindly refer to this officer previous request regarding continued stay of Mr. Ahmad Ijaz (PET) of this School.

Mr. Ahmad Ijaz MSc-HPF, young and energetic Teacher is performing his duties efficiently and has a vigilant eye on the overall discipline, internal Security of the institution. The Undersigned is of the view that during the present Security situation, his continued stay and services in this school are in the best interest of students and institution. It is requested that he may please not be shifted from this school.

Agreed with the Principal's request.

[Signature]
Vice Principal
G.H.S.S. No-1, Haripur

[Signature]
Principal
GCMHSS No-1,
Haripur
PRINCIPAL
Govt. Centennial Model Higher
Secondary School No. 1, Haripur

*Principal's request may be
viewed pl in the current
situation.*

[Signature]
Chairman P.T.C.
GCMH.S.S. No.1
Haripur

Attested
[Signature]



~~21~~ 21 Annex "F"
OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
HARIPUR

Ph: 0995-610178

ORDER

As approved by the competent authority, the following transfer order of teaching staff of Elementary & Secondary Education Department Haripur is hereby issued on their own pay & grade, in the best interest of public service with immediate effect.

S.No	Name & Designation	From	To	Remarks
01	Hamad Ejaz PET BPS-15	GCMHSS No.01 Haripur	GMS Mankarai	Vice S.No.02 on Administrative grounds.
02	Muhammad Shafique PET BPS-15	GMS Mankarai	GCMHSS No.01 Haripur	Vice S.No.01

Note:-

1. No TA/DA is allowed to anyone.
2. Charge report should be submitted to all concerned.

-----Sd-----
District Education Officer
Haripur

Ends: No 432-34 /

Dated Haripur the 17 / 1 / 2015

Copy to:-

1. The District Accounts Officer Haripur.
2. The Principal/HM concerned.
3. Office record file.

Dy: District Education Officer
(M) Haripur

Admitted



22 سپتمبر 2015ء

مخبر - توہین عدالت - ایپل برائے منوچی آرڈر نمبر 34-32-432 مورف 15-1-17

جناب عالی! گزارش ہے کہ میں نے آپ کے پاس مورف 15-01-23 کو ایک ایپل جمع کروائی ہیں نے آپ کو تحریری طور پر بتایا تھا کہ میں سکول کے ٹیما کا ڈسپلن سیکورٹی اور تفریقی کاموں کا انجام ہوں اور ساتھ لپٹا اور کمی وجہ سے 16 دسمبر تا 15 جنوری 2015 تک بند رہے اور سکول کی چار دیواری، کانسٹنٹ اور باقی سیکورٹی انتظامات کیلئے میں پریسینٹ ہوں اور اس پریسینٹ کے ساتھ مجموعی سے شہادت نامی تک مل کر وٹا مارا جبکہ ثبوت آپ حاضری رجسٹر پر دیکھ سکتے ہیں

میرا پریسینٹ آپ کو ایک لپٹر بنا تھا جس کا نمبر 988 مورف 15-01-12 تھا آپ سے درخواست کی کہ سکول کا ENERGETIC اور EFFICIENT بنو اور سکول کے ڈسپلن اور سیکورٹی میں اہم کردار ادا کرنا ہے جس کی مالی سہاؤلف ہے

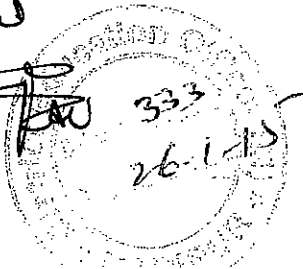
تسریں کی ہی ایک دفعہ مجھے سیاسی بنیادوں پر جھوٹے الزامات لگا کر بیان سے ٹرانسفر کیا گیا۔ جبکہ ایپل میں نے Services Tribunal میں کی اور تمام الزامات جھوٹے ثابت ہونے پر مجھے دوبارہ اپنی جگہ پر تعینات کرنے کے احکامات صادر کیے گئے جس کی مالی سہاؤلف ہے

اب بھی مجھے دوبارہ لپٹا نہیں دیا گیا ہے بیان سے ٹرانسفر کر دیا گیا ہے جو کہ واضح طور پر توہین عدالت ہے کیونکہ میرا Tenure ہی میں مکمل اور میرا پریسینٹ ابھی مجھ سے فوش میں اسلئے آپ سے درخواست ہے کہ میرا یہ آرڈر منوع کیا جائے۔ ورنہ مجھے الغاف کے حصول کیلئے عدالت جانے کا مکمل حق ہے

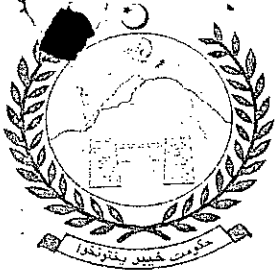
[Handwritten signature]

بسم اللہ

محمد الحار



لکھنؤ لکھنؤ لکھنؤ



23
Office of the District Education Officer(M)

HARIPUR

PH No. 0995-610178, 610268

No. 757

Dated Haripur the 31 /01/2015.

To

Ammad Ejaz PET,
GCMHSS No.1 Haripur

Subject: APPEAL AGAINST TRANSFER OF PET FROM GCMHSS No.1
HARIPUR TO GMS MIRPUR.

Memo:-

In response to your appeal regarding your transfer from GCMHSS No.1 Haripur to GMS Mankarae vide No.432-34 dated 17-01-2015.

You are informed that your appeal can not be entertained on the basis that the transfer order has been issued on administrative grounds in the best interest of institution & students. The rift among staff members and constant Complaints and enquires are against the spirit of healthy educational Environment and smooth functioning of school. Furthermore this transfer is not a punishment rather a corrective measure and your new station of posting is hardly 5 to 6 Kilo meters from GCMHSS No.1 Haripur. Therefore the appeal is regretted.

Amjad Ali 30/1/15
Dy: District Education Officer (Male)
Haripur

Attested
H. B. Khan

at

وکالت نامہ

تہیتی

کورٹ فیس

بعدالت جنرل Khyber Pakhtoon Khaw Service Tribunal

Appellant

منجاب

Hamad Ejaz



Govt of K.P.K others

Peshawar / ABBOTTABAD

باعث تحریر نامہ Appeal

دعویٰ یا جرم

Hamayun Khan & Alysha Khan

مندرجہ بالا عنوان میں اپنی طرف سے بیروی و جوابدہی مقابلاً

ایڈووکیٹس کی ایک ووکیٹ بدیں شرط وکیل مقرر کیا۔ کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص

رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دے کر حاضر کروں گا۔ اگر کسی

پیشی پر مظہر حاضر نہ ہوا۔ اور حاضری کی وجہ سے کسی وجہ پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ

ہوئے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی اور جگہ یا پکھری کے مقرر اوقات سے پہلے یا بروز

تعطیل بیروی کرنے کے مجاز نہ ہونگے۔ اگر مقدمہ مقام پکھری کے کسی اور جگہ سماعت ہونے یا بروز پکھری کے اوقات

کے آگیا یا پیچھے ہونے پر مظہر کو کوئی نقصان پہنچے تو ذمہ دار یا اس کے رابطے کسی معاوضہ ادا کرنے مختار نامہ واپس کرنے کے

بھی صاحب موصوف ذمہ دار نہ ہونگے۔ مجھے کل ساختہ پرواختہ صاحب مثل کردہ ذات خود منظور و قبول ہوگا اور صاحب

موصوف کو عرضی دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تعقدیق

کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجرا کرنے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے

کا ہر قسم کا بیان دینے اور سپروٹائشی و راضی نامہ و فیصلہ برخلاف کرنے اقبال دعویٰ کا اختیار ہوگا۔ اور بصورت اپیل و

برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم اتناعی یا ڈگری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو

بشرط ادا کیگی علیحدہ بیروی مختار نامہ کرینکا مجاز ہوگا۔ اور بصورت ضرورت اپیل یا اپیل کے واسطے کسی دوسرے وکیل یا بیرسٹر

کو بجائے اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہونگے جیسے صاحب

موصوف کو۔ پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیروی نہ

کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا ہے کہ سند ہے مضمون

مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا اور منظور ہے۔

10/2/15

مورخہ: 20

العبد العبد العبد

Accepted by

Hamad Ejaz

حماد اعجاز