

25.01.2018


Counsel for the appellant present. Mr. Kabir Ullah Khattak, DDA and counsel for private respondent No. 4 to 6 also present. Counsel for private respondents seeks adjournment. Adjourned. To come up for arguments on 01-03-18 before D.B.

  
Member

  
Chairman

01.03.2018

Learned counsel for the appellant and Mr. Muhammad Jan, Learned Deputy District Attorney for official respondents present. Muhammad Naeem Yousafzai Advocate submitted wakalat nama for private respondents No.5 & 6 and seeks adjournment being freshly engaged. Adjourn. To come up for arguments on 05.04.2018 before D.B

  
(Gul Zeb Khan)  
Member


  
(Muhammad Hamid Mughal)  
Member

05.04.2018

Learned counsel for the appellant present and seeks withdrawal of the present appeal on the plea that the same has become infructuous.

In view of above the present appeal is hereby dismissed as withdrawn. No order as to costs. File be consigned to the record room.

  
(Ahmad Hassan)  
Member


  
(Muhammad Hamid Mughal)  
Member

I want to withdraw my present appeal, being infructuous  
05-04-18

15.11.2017

Counsel for the appellant and Mr. Muhammad Jan, DDA for respondents present. Learned counsel for the appellant seeks time to implead Muhammad Yousaf and Hidayatullah both ~~are~~ lecturer in Chemistry, in the calendar of respondents. Adjourned. To come up for arguments on 05.12.2017

  
(Ahmad Hassan)  
Member

  
(Muhammad Hamid Mughal)  
Member

05.12.2017

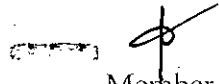
Counsel for the appellant present. Mr. Muhammad Jan, Deputy District Attorney alongwith Mr. Murad Ali, Superintendent for the respondents also present. Counsel for the appellant has already submitted application for impleadment of Hidayatullah, Lecturer Government Post Graduate College Mardan and Muhammad Yaqoob Lecturer Government Post Graduate College Mardan as respondents in the present appeal. Learned counsel for the appellant ~~has~~ stated that Hidayatullah, Lecturer Government Post Graduate College Mardan and Muhammad Yaqoob Lecturer Government Post Graduate College Mardan are necessary party in the appeal therefore, their impleadment as party in the appeal is necessary. Admittedly there is no bar on this Tribunal to implead them in the appeal therefore, application is accepted. Muharrar of the Tribunal is directed to make entry in this regard in the appeal. Counsel for the appellant is directed to submit spare copies of the instant appeal for issuance of notice to newly impleaded respondents and thereafter notice be issued to the respondents. Adjourned. To come up for further proceedings on 25.01.2018.


  
(AHMAD HASSAN)  
MEMBER (E)

  
(MUHAMMAD AMIN KHAN KUNDI)  
MEMBER (J)

06.10.2017

Counsel for the appellant present. Mr. Muhammad Jan, Deputy District Attorney for official respondents and private respondent No. 4 also present. Counsel for the appellant submitted rejoinder which is placed on file. To come up for arguments on 18.10.2017 before D.B.

  
Member  
(Executive)

  
Member  
(Judicial)

18.10.2017


Counsel for the appellant and Mr. Usman Ghani, District Attorney alongwith Mr. Murad Khan, Supdt for respondents present. Counsel for appellant seeks adjournment. Appellant is also be summarised in person on next date of hearing. Adjourned. To come up for arguments on 08.11.2017 before D.B.


  
Member  
(Executive)

  
Member  
(Judicial)

08.11.2017


Counsel for the appellant present. Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Counsel for the appellant requested for adjournment. Request accepted. To come up for arguments on 15.11.2017 before D.B.

  
(Gul Zeb Khan)  
Member (E)

  
(Muhammad Amin Khan Kund)  
Member (J)

20.04.2017


Counsel for the appellant, Addl. AG for official respondents and counsel for private respondent No. 4 present. Counsel for private respondent No. 4 submitted written reply. Cost of Rs. 500/- also paid and receipt thereof obtained from the learned counsel for the appellant. To come up for rejoinder and final hearing on 31.05.2017.

  
(Muhammad Amin Khan Kundi)  
Member

31.05.2017

Counsel for the appellant and Mr. Irfan, Assistant Director Litigation alongwith Mr. Muhammad Adeel Butt, Additional AG for the respondent present. Counsel for the appellant requested for time to file rejoinder. Request accepted. To come up for rejoinder and arguments on 04.09.2017 before D.B.

  
(Muhammad Amin Khan Kundi)  
Member

  
(Gul Zeb Khan)  
Member

04.09.2017

Since 4<sup>th</sup> September, 2017 has been declared as Public Holiday on account of Eid-UI-Azha. Therefore the case is adjourned for the same on 6.10.17 before D.B. Parties be informed accordingly.

  
(Reader)

1018/2016


12.01.2017

Appellant in person, Mr. Murad Ali, Superintendent alongwith Additional AG for official respondents No. 1 to 3 and private respondent No. 4 in person present. Written reply not submitted. Requested for adjournment. To come up for written reply/comments on 15.02.2017 before S.B.

  
Chairman

15.02.2017

Counsel for the appellant, Mr. Asif Khan, AD alongwith Addl. AG for official respondents and private respondents No. 3 and 4 in person present. Written reply submitted on behalf of respondents No. 1 and 2. Remaining respondents requested for adjournment. To come up for written reply/comments on 22.03.2017 before S.B.

  
(AHMAD/HASSAN)

MEMBER

22.03.2017

Clerk of counsel for the appellant, Mr. Murad Khan, Supdt. for respondents No. 1 & 2 alongwith Asstt. AG for official respondents present. Written reply by official respondents No. 1 & 2 already submitted. Learned Asstt. AG relies on the same on behalf of respondents No. 3. Private respondent No. 4 with counsel (Mst. Rowaida Khan Afshan, Advocate) present, Wakalatnama submitted and requested for further adjournment which is granted subject to payment of cost of Rs. 500/- which shall be paid by private respondent No. 4 from his own pocket. To come up for written reply of respondent No. 4 and cost on 20.04.2017 before S.B.

  
Chairman

03.11.2016

Learned counsel for the appellant has argued that the appellant is serving as Lecturer in Chemistry in Government Post Graduate College Mardan. That vide impugned order dated 14.06.2016 he was transferred from the said college to Government Degree College, Zaida Swabi where-against he preferred departmental appeal on 18.06.2016 which was not responded and hence the instant service appeal on 27.09.2016.

That the appellant is a student of Ph.D at Abdul Wali Khan University Mardan wherein he is studying after obtaining NOC from the concerned authority and according to which he is bound to serve the department for at least five consecutive years after completion of his Ph.D course. That a letter dated 18.6.2016 was also issued by the Principal GPGC, Mardan requesting for cancellation of the said transfer order. That the impugned order is against facts and law and liable to be set aside.

Appellant Deposited  
Security & Process Fee

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 19.12.2016 before S.B.

19.12.2016

Counsel for the appellant and Assistant AG for respondents present: Security and process fee not deposited. Appellant is directed to deposit security and process fee within seven days, thereafter notices be issued to the respondents for written reply/comments on 12.01.2017 before S.B.




Chairman

Member

Form- A  
FORM OF ORDER SHEET

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

Case No. 1018/2016

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	29/09/2016	<p>The appeal of Mr. Abdul Malik resubmitted today by Mr. Daris Khan Advocate may be entered in the Institution Register and put up to Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 29/9/16.</p>
2	30-9-2016	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>17-10-2016</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	17.10.2016	<p>Counsel for the appellant present. Counsel for the appellant requested for adjournment. Request accepted. To come up for preliminary hearing on 03.11.2016 before S.B.</p> <p style="text-align: right;"> Member</p>

The appeal of Mr. Abdul.Malik Lecturer in Chemistry Govt. Degree College Zaida Swabi received today i.e. on 27.09.2016 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

Memorandum of appeal may be got signed by the appellatant.

No. 1611 /S.T,

DI. 27/10 /2016

*Resubmitted after completing  
all requirements*

Mr. Daris Khan Adv. Pesh.

*29-9-2016*

*[Signature]*  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.



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

S.A.No. 1018 /2016

Abdul Malik.....Appellant

Versus

Govt. of KPK through Secretary High Education & others

.....Respondents

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S#	Description of documents.	Annexure	Pages
1	Memo of appeal with affidavit.		1-4
2.	Stay application with affidavit.		5-7
3	Copy of impugned notification dated 14.06.2016	A	8-10
4	Copy of representation	B	0-11
5	Copy of NOC	C	0-12
6	Copy of letter dated 18.06.2016.	D	0-13
7	Wakalatnama		0-14

  
Appellant

Through

  
Daris Khan  
Advocate High Court  
Peshawar.  
Cell: 0300-9849354

Dated: 27.09.2016

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,  
PESHAWAR.

S.A.No. 1018 2016

Khyber Pakhtukhwa  
Service Tribunal

Diary No. 1024

Dated 27-9-2016

**Abdul Malik**  
Lecturer in Chemistry  
Govt. Degree College, Zaida, Swabi.....Appellant

Versus

- 1) Govt. of KPK through Secretary Higher Education, Civil Secretariat, Peshawar.
- 2) Director Higher Education, near GHSS No.1, G.T Road, Peshawar.
- 3) Principal Govt. Postgraduate College, Mardan
- 4) Mr. Murad Ali, Lecturer in Chemistry, Govt. Postgraduate College, Mardan.

5. *Munir Yaqoob, lecturer, post graduate college mardan.*
6. *Hidayat ulah, lecturer, post graduate college mardan.*

APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE NOTIFICATION NO.SO(C-11)HE/2-5/16 DATED 14.06.2016 WHEREBY THE APPELLANT WAS TRANSFERRED FROM GOVT. POSTGRADUATE COLLEGE MARDAN TO GOVT. DEGREE COLLEGE ZAIDA, SWABI AND REPRESENTATION OF APPELLANT WAS NOT DECIDED WITHIN THE STATUTORY PERIOD OF 90 DAYS.

Filed to-day

Registrar

27/9/16

Respectfully Sheweth;

Appellant humbly submits as under:

- 1) That appellant was appointed as Lecturer in Chemistry.

Re-submitted

27/9/16

to-day

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- 2) That the respondent No.1 has issued the impugned notification No.SO(C-II)HE/2-5/16 dated 14.06.2016 through which the appellant has been transferred from Govt. Postgraduate College, Mardan to Govt. Degree College Zaida, Swabi. (Copy of impugned notification dated 14.06.2016 is Annexure "A").
- 3) That the appellant filed representation, which was not decided within the stipulated period. (Copy of representation is Annexure "B"). Hence this Appeal on the following amongst other grounds:

**GROUND:**

- a. That impugned notification dated 14.06.2016 passed by respondent No.1 is illegal, void ab-initio, against law, rules and policy.
- b. That the notification of respondent is discriminatory, illegal, and void, hence untenable under the law.
- c. That in impugned notification, respondent have not given any legal justification for transferring the appellant from the said post.
- d. That appellant has not been treated in accordance with law therefore respondents have violated Articles 4 and 25 of Constitution of Islamic Republic of Pakistan, 1973.
- e. That N.O.C. ha been issued to the appellant subject to the condition that no leave implication will be involved and his classes at the college will not suffer and he will serve this department for at least five consecutive years after completion of his Ph.D course. (Copy of NOC is Annexure "C").
- f. That respondent No.3 also wrote a letter dated 18.06.2016 to respondent No.2 in which he requested for retaining the appellant at GPGC Mardan in the best Public interest. (Copy of letter is Annexure "D").

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- a. That appellant seeks permission of this hon'ble court to advance any other ground/ point at the time of arguments.

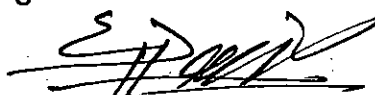
It is, therefore, humbly prayed that on acceptance of this appeal, notification issued by respondent No.1 dated 14.06.2016 may please be cancelled/ set aside and appellant may please be permitted to continue his duties at Govt. Postgraduate College, Mardan.

Any other relief which this hon'ble court deems appropriate in the circumstances of the case and not specifically asked for may kindly also be granted.



Appellant

Through



Daris Khan  
Advocate High Court  
Peshawar.

Dated 22-9-16

4

**BEFORE THE SERVICE TRIBUNAL, PESHAWAR**

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

Abdul Malik ..... **Petitioner**

**VERSUS**

Govt of Khyber Pakhtunkhawa through Secretary Higher Education peshawar and others ..... **Respondents**

**AFFIDAVIT**

I, Abdul Malik S/o Amir Khan R/o Kandary Mardan, (Lecturer in Chemistry), do hereby solemnly affirm and declare on oath that the contents of the accompanying **Appeal** 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 SERVICE TRIBUNAL PESHAWAR

For Applicant

Abdul Malik .....

Witness

Govt of Punjab, Peshawar

Respondents

AFFIDAVIT

A ...  
I ...  
The contents ...  
I ...  
been concluded from the ...

DETONENT

CNIC.No.



5

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

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

IN

S.A.No. \_\_\_\_\_ 2016

Abdul Malik.....Petitioner

Versus

Govt. of KPK through Secretary High Education & others

.....Respondents

APPLICATION FOR SUSPENSION OF  
OPERATION OF IMPUGNED  
NOTIFICATION DATED 14.06.2016 TILL  
DECISION OF ACCOMPANYING APPEAL.

***Respectfully Sheweth;***

- 1) That the above noted appeal is being filed today before this hon'ble Tribunal in which no date has yet been fixed.
- 2) That grounds of appeal may be considered as part and parcel of this application.
- 3) That prima facie case exists in favour of petitioner.
- 4) That balance of convenience also lies in favour of grant of interim relief.

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- 5) That if the interim relief is not granted, petitioner will suffer irreparable loss.

It is, therefore, prayed that on acceptance of this application, operation of impugned notification dated 14.06.2016 may please be suspended till decision of accompanying appeal.



Appellant

Through



Daris Khan  
Advocate High Court  
Peshawar.



2

**BEFORE THE SERVICE TRIBUNAL, PESHAWAR**

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

Abdul Malik ..... **Petitioner**

**VERSUS**

Govt of Khyber Pakhtunkhawa through Secretary Higher Education peshawar and others ..... **Respondents**

**AFFIDAVIT**

I, Abdul Malik S/o Amir Khan R/o Kandary Mardan, (Lecturer in Chemistry), do hereby solemnly affirm and declare on oath that 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 Tribunal.

**DEPONENT**

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

Abdul Malik ..... Petitioner

**VERSUS**

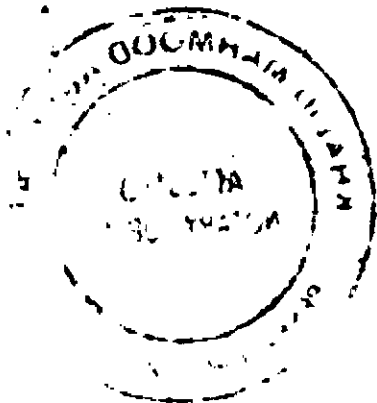
Govt of Khyber Pakhtunkhwa through Secretary Higher Education Peshawar and others ..... Respondents

**AFFIDAVIT**

I, Abdul Malik s/o Amir Khan R/o Kanday Mardan, Lecturer in Chemistry, do hereby solemnly affirm and declare on oath that 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 Tribunal.

**DEPONENT**

**CNIC No.**





GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES &  
LIBRARIES DEPARTMENT

Dated Peshawar, 14<sup>th</sup> June, 2016.

2

NOTIFICATION

Awais A

No.SO(C-II)HE/2-5/16/ The Competent Authority is pleased to order the transfer/posting of the following Lecturers of College Cadre mentioned against each with immediate effect in the best Public interest.

S. NO.	NAME AND DESIGNATION	FROM	TO	REMARKS
1.	Mr. Akhtar Gul, Lecturer in Urdu	GDC, B D Shah	GDC, Thana Malakand	AVP
2.	Mr. Jamil Sheraz, Lecturer in Physics.	GDC, Zarabi (Swabi)	GDC ANK (Shaheed) Degree College KTS (Haripur)	AVP
3.	<del>Mr. Inayatullah, Lecturer in Islamiyat</del>	<del>GDC, Landi-Jalander (Bannu)</del>	<del>GPGC, Lakki-Marwat</del>	<del>Vice S No.4</del>
4.	Mr. Abdul Basit, Lecturer in Islamiyat	GPGC, Lakki Marwat	GDC, Landi Jalander	Vice S No.3
5.	Mr. Tahir Iqbal, Lecturer in English	GDC, KDA Kohat	GPGC, Karak	Vice S No.6
6.	Mr. Naqib ur Rehman, Lecturer in English	GPGC, Karak	GDC, KDA Kohat	Vice S No.5
7.	Mr. Sardar Ahmad Farooq, Lecturer in English	GDC, Darband	GPGC, Mansehra	Vice S No.8
8.	Mr. Danish Farid, Lecturer in English	GPGC, Mansehra	GDC, Darband	Vice S No.7
9.	Mr. Rizwanullah, Lecturer in Pol: Science	GDC, Booni (Chitral)	GDC, Badhber (Peshawar)	AVP
10.	Mr. Essa Khan, Lecturer in Economics	GDC, Barkhalozai	GDC, Bakhshali (Mardan)	Vice S No.11
11.	Mr. Tilawat Shah, Lecturer in Economics	GDC, Bakhshali (Mardan)	GDC, Barkhalozai	Vice S No.10
12.	Mr. Naveed Ahmad, Lecturer in Chemistry	GDC, Battagram	GPGC, Mansehra	Vice S No.13
13.	Mr. Sagher Gul, Lecturer in Chemistry	GPGC, Mansehra	GDC, Battagram	Vice S No.12
14.	Mr. Zia Ur Rehman, Lecturer in Islamiyat	GDC, Pattan (Kohistan)	GPGC, Mansehra	Vice S No.15
15.	Syed Mahmood Ul Hassan, Lecturer in Islamiyat	GPGC, Mansehra	GDC, Pattan (Kohistan)	Vice S No.14
16.	Mr. Mohammad Ashfaq, Lecturer in Chemistry	GPGC, Charsadda	GPGC, Mardan	Vice S No.17
17.	Mr. Ihsan Ullah, Lecturer in Chemistry	GPGC, Mardan	GPGC, Charsadda	Vice S No.16

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ATTESTED  
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18.	Mr. Mazhar Elahi, Lecturer in Mathematics	GDC, Lahor (Swabi)	GDC, Akbarpura (Nowshera)	AVP.
19.	Mr. Mohammad Fayyaz, Lecturer in Physics	GDC, Chakessar (Shangla)	GDC, Thana (Malakand)	Vice S No.20
20.	Mr. Malki Wadan, Lecturer in Physics	GDC, Thana	GDC, Chakessar	Vice S No.19
21.	Mr. Ali Raza, Lecturer in History	GDC Utmanzai (Charsadda)	GDC, Akbarpura (Nowshera)	AVP
22.	Dr. Hikmat Ullah Jan, Lecturer in Botany	GPGC, Bannu	GSSC, Peshawar	AVP
23.	Mr. Muhammad Aslat, Lecturer in History	GDC, Badhber	GDC, Pabbi	AVP
24.	Mr. Wajid Ali, Lecturer in Physics	GDC, Oghai (Mansehra)	GPGC, Mansehra \	Vice S No.25
25.	Mr. Ali Ahmad, Lecturer in Physics	GPGC, Mansehra	GDC, Oghai	Vice S No.24
26.	Mr. Nisar Khan, Lecturer in Islamiyat	GDC, Ghazi (Haripur)	GDC, Khanpur (Haripur)	Vice S No.27
27.	Mr. Waqar Ahmad, Lecturer in Islamiyat	GDC, Khanpur	GDC, Ghazi	Vice S No.26
28.	Mr. Alamzeb Khan, Lecturer in Physics	GDC, Landi Jalander (Bannu)	GPGC, Bannu	Vice S No.29 (Mutual transfer)
29.	Mr. Waris Khan, Lecturer in Physics at GPGC, Bannu,	GPGC, Bannu	GDC, Landi Jalander	Vice S No.28 (Mutual transfer).
30.	Mr. Mohammad Hanif Afridi, Lecturer in Economics	GDC, Puran (Shangla)	GPGC, Mansehra	AVP
31.	Mr. Mohammad Shakeel, Lecturer in Urdu	GDC, Khanpur (Haripur)	GPGC, No. 1 Abbottabad	Vice S No.32
32.	Mr. Zafar Iqbal, Lecturer in Urdu	GPGC, No. 1 Abbottabad	GDC, Khanpur	Vice S No.31
33.	Mr. Mehmood ul Hassan, Lecturer in English	GDC, Shabqadar (Charsadda)	GDC, Naguman (Peshawar)	AVP
34.	Mr. Mohammad Nisar, Lecturer in Zoology	GDC, Hangu	GPGC, Kohat	AVP
35.	Mr. Imran Khan, Lecturer in Mathematics	GDC, Lachi (Kohat)	GDC, Hangu	Vice S. No. 36
36.	Mr. Yasir Mahmood, Lecturer in Mathematics	GDC, No. 1 D.I. Khan	GDC, Lachi (Kohat)	Vice S. No. 35
37.	Mr. Gul Haider, Lecturer in Urdu	GDC, kotha Swabi	GDC, Gandaf Swabi.	AVP
38.	Mr. Farrukh Kamran, Lecturer in English	GDC, Lachi	GPGC, Kohat	Vice S No.39
39.	Mr. Abid Saleem, Lecturer in English	GPGC, Kohat	GDC, Lachi	Vice S No.38
40.	Mr. Fahim Ullah Khan, Lecturer in Maths	GDC, Kulachi	GDC, Sarai Naurang	Vice S No.41
41.	Mr. Usman Ullah, Assistant Professor of Maths	GDC, Sarai Naurang	GDC, Kulachi	Vice S No.40 as a substitute.
42.	Mr. Muhammad Anwar, Lecturer in Political Science	GDC, Kulachi	GPGC, Lakki	Vice S No.43
43.	Mr. Jadoon Saif Ullah Khan, Lecturer in Political Science	GPGC, Lakki	GDC, Kulachi	Vice S No.42 as substitute.

**ATTESTED**

44.	Mr.Sibghat Ullah Qureshi, Lecturer of Urdu	GDC, Landhi Jalander	GDC, No.02 Bannu	Vice S No.45
45.	Mr.Irfan Ullah, Assistant Professor of Urdu	GDC, No.02 Bannu	GDC, Landhi Jalander	Vice S, No.44
46.	Mr.Muhammad Zubair, Lecturer in Pakistan study	GPGC, Mansehra	GDC, Lissan Nawab	Vice S No.47
47.	Mr.Maratab Ali Lodhi, Lecturer in Pakistan study	GDC, Lissan Nawab	GPGC, Mansehra	Vice S No.46
48.	Mr.Murad Ali, Lecturer in Chemistry	GDC, Zaida Swabi	GPGC, Mardan	Vice S No. 49
49.	Mr.Abdul Malik, Lecturer in Chemistry	GPGC, Mardan	GDC, Zaida Swabi	Vice S No.48
50.	Dr. Zia Mohammad, Lecturer in Chemistry	GDC, Paharpur (D.I.Khan)	GDC, No. 1 D.I.Khan	Vice S No.51
51.	Syed Badshah, Lecturer in Chemistry	GDC, No.1 D'I Khan	GDC, Paharpur(D I Khan)	Vice S No.50
52.	Mr. Sharifullah, Lecturer in Economics	GDC, Landi Jalander (Bannu)	GDC, Tajori (Lakki Marwat)	AVP
53.	Mr. Khalid Pervaiz, Lecturer in English	GDC, Booni (Chitral)	GDC, Chitral	AVP
54.	Mr. Razaullah Khan, Lecturer in Statistics	GDC, Paniala (D.I. Khan)	GDC, No. 3 D.I. Khan	AVP
55.	Mr. Jamil Ahmad, Lecturer in Economics	GDC, Takht Bhai (Mardan)	GDC, Lund Khwar (Mardan)	Vice S No.56
56.	Mr.Arif Khan, Lecturer in Economics	GDC, Lundkhar	GDC, Takht Bhai	Vice S No.55
57.	Mr.Rahim Dad, Lecturer in Maths	GDC, Thana	GPGC, Nowshera.	AVP
58.	Mr.Rooh Ul Amin. Lecturer in Botany	GDC, Puran Shangla	GPGJC, Swat	Vice S No.59
59.	Mr.Hameed Iqbal, Lecturer in Botany	GPGJC, Swat	GDC, Puran Shangla	Vice S No.58
60.	Mr.Abubakkar Sidiqqe, Lecturer in Urdu	GPGC, Haripur	GPGJC, Swat	Vice S No.61
61.	Mr.Akhtar Ali, Lecturer in Urdu	GPGJC, Swat	GPGC, Haripur	Vice S No.60
62.	Mr.Feroz shah, Lecturer in Urdu	GDC, Dara Adam Khel	GPGC, Mardan	AVP
63.	Mr.Naveed Hussain, Lecturer in Computer Science	GDC, Thana	GPGC Mardan	Vice S No.64
64.	Mr.Ishaq Ahmad, Lecturer in Computer Science	GPGC, Mardan	GDC, Thana	Vice S No.63
65.	Mr.Zar Moeen. Lecturer in Mathematics	GDC, Takhte Nasrati	GPGC, Kohat	Vice S No.66
66.	Mr.Zubair Ahmad, Lecturer in Maths	GPGC, Kohat	GDC, Takhte Nasrati	Vice S No.65
67.	Mr.Muhammad Ubaid Ullah Anwar, Lecturer in Geography	GDC, Takhtbhai	GDC, Wadpagga	AVP
68.	Mr.Ijaz Ali Khan, Lecturer in English	GDC, Shewa Swabi	GDC, Lahor Swabi	Vice S No.69
69.	Mr.Waheed Jan, Lecturer in English	GDC, Lahor Swabi	GDC, Shewa Swabi	Vice S No.68

**ATTESTED**

70.	Mr.Muhammad Abid,Lecturer in Computer Science	GDC, Nathiagali	GPGC , Mansehra	Vice S No.71
71.	Mr.Muhammad Anwar, Lecturer in Computer Science	GPGC,Mansehra	GDC,Nathiagali	Vice S No.70
72.	Mr.Tilla Muhammad Khan, Lecturer in Geography	GPGC, Karak	GPGC, Lakki Marwat	AVP
73.	Mr.Zahid Ali, Lecturer in Geography.	GDC, Wadpagga Peshawar	GDC,Akbar Pura Nowshera	AVP
74.	Mr.Abdul Zahoor, Lecturer in Political Science	GDC, Khan Kohi	GDC,Akora Khattak	Vice S No.75
75.	Mr.Ehsan Ullah, Assistant Professor of Political Science	GDC,Akora Khattak	GDC,Khan Kohi	Vice S No.74
76.	Mr. Rashid Ahmad, Lecturer in English	GPGJC, Saidu Sharif (Swat)	GDC, Kabal (Swat)	AVP
77.	Mr. Fazal Wahid, Lecturer in Pashto	GPGJC, Saidu Sharif (Swat)	GPGC, Mardan	AVP
78.	Mr.Fazal Hayat Khan, Lecturer in Computer Science	GPGC, Swabi	GDC, Gulabad (Lower Dir)	Vice S No.79
79.	Mr.Muhammad Raees Khan, Assistant Professor of Computer Science	GDC,Gulabad	GPGC,Swabi	Vice S No.78
80.	Mr.Muhammad Iqbal, Lecturer in Botany	GPGC, Dargai	GPGC, Abottabad No.1	Vice S No.81
81.	Mr.Muhammad Aamir, Lecturer in Botany	GPGC,Abottabad No.1	GPGC,Dargai	Vice S No.80
82.	Mr.Naik Bahadar, Lecturer in Mathematics	GDC,Palai	GPGC,Dargai	Vice S No.83
83.	Mr.Karim Ullah, Assistant Professor of Maths	GPGC,Dargai	GDC,Palai	Vice S No.82
84.	Mr.Said Nawaz, Lecturer in Geography	GDC,Takhte Nasrati	GPGC,Karak	Vice S No.72
85.	Mr.Ikram Ullah Khan, Lecturer in Political Science	GDC,Tajori	GPGC,Lakki Marwat	AVP
86.	Mr.Muhammad Anwar, Lecturer in English	GDC,Agra	GDC,Batkheela	AVP
87.	Mr.Abid Sultan, Assistant Professor of English	GDC,Thana	GDC,Agra	Vice S No.86
88.	Mr.Sultan Zaib, Lecturer in Zoology	GDC,Nathiagali	GPGC,Mandian Abottabad	Vice S No.89
89.	Mr.Muhammmad Saeed Amjad, Assistant Professor of Zoology	GPGC,Mandian	GDC,Nathiagali	Vice S No.88
90.	Mr.Muhammad Abid, Lecturer in Statistics	GDC,Nawagai	GPGC,Mardan	Vice S No.91
91.	Mr.Farooq Ahmad, Lecturer in Statistics	GPGC,Mardan	GDC,Nawagai	Vice S No.90
92.	Mr. Muhammad Waqas Ali Shah, Lecturer in Computer Science	GDC, No.03 D I Khan	GDC,Kothka Habib Ullah (Bannu)	Vice S No.93
93.	Mr.Saad Ullah Khan, Assistant Professor of Computer Science	GDC,Kothka Habib Ullah (Bannu)	GDC,No.03 D I Khan	Vice S No.92
94.	Mr.Kishwar Ali, Lecturer in Chemistry	GDC,Chakessar	GPGJC,Swat	Vice S No.95

*EAD*  
**ATTESTED**

95.	Mr. Muhammad Imran. Lecturer in Chemistry.	GPGJC, Swat	GDC, Chakessar	Vice S No.94
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Note: No TA/DA is allowed.

15

SECRETARY TO  
GOVT. OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION DEPARTMENT

Endst: No. & Date Even

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. PSO to Chief Secretary, Khyber Pakhtunkhwa.
4. Director Higher Education, Khyber Pakhtunkhwa, Peshawar.
5. Principals of all the concerned Colleges.
6. Manager, Govt. Printing Press, Khyber Pakhtunkhwa, Peshawar.
7. Deputy Director HEMIS Cell, Higher Education Department, Tasneem Plaza 3rd Floor, 2nd Flat, Saddar Peshawar.
8. District Accounts Officers concerned.
9. Officers Concerned.

*Atal Sarwar Dabeen*  
Section Officer (Colleges-II)

*EJ*  
ATTESTED

To

The Director Higher education  
Khyber Pakhtunkhwa, Peshawar.

Annexure B

Subject: adjustment against vacant post at GPGC Mardan

Respected Sir,

Please refer to Govt. of Khyber Pakhtunkhwa higher education department notification No. SO(C-II) HE/2-5/16, dated 14-06-2016, wherein I have been transfer to GDC Zaida Swabi from GPGC Mardan at S.No. 49.

It is pertinent to mention that I am involved in PhD from Abdul Wali Khan University Mardan (Photo copy of NOC enclosed). It is an uphill task to continue my PhD studies. Furthermore, some lecturers in chemistry have longer stay at GPGC Mardan than me. They are still serving at GPGC Mardan. My transfer in this situation is totally consisting of injustice.

Keeping in view the above mention scenario, it is earnestly requested to switch off myself from GDC Zaida to GPGC Mardan.

If your kind personage deems fit my this supplication, I will be very thankful for your this kind heartedness

Obediently yours,

Abdul Malik

Lecturer in Chemistry

GDC Zaida Swabi.

12-6-14

Secretary, HES,  
PWT UP PL.

MUSHTAQ AHMAD GHANI  
Sci Assistant to Chief Minister for  
Higher Education & Information  
Khyber Pakhtunkhwa

153 / 2017 AS - SO (C-II)

EP  
ALISTED







DIRECTORATE OF HIGHER EDUCATION  
KHYBER PAKHTUNKHWA,  
KHYBER ROAD PESHAWAR

Phone # 091-9210242, 9211025/Fax # 9210215

No. 22553 / CA-11/Estt. Branch/A-12/ Abdul Malik/Chemistry

12

Ammar  
C4

To

Dated Peshawar the 17/8/2015

The Registrar  
Abdul Wali Khan University Mardan.

SUBJECT

REQUEST FOR AN NOC FOR PERSUING PH.D IN  
CHEMISTRY AT ABDUL WALI KHAN UNIVERSITY MARDAN  
(AWKUM).

Dear Sir,

I am directed to refer to the subject cited above and to state that this Directorate has no objection upon taking admission in Ph.D in Chemistry of Mr. Abdul Malik Lecturer in Chemistry Govt; Postgraduate College, Mardan at Abdul Wali Khan University, Mardan.

Yours Faithfully,

*M. Bashir*

(Mohammad Bashir)

DY: DIRECTOR (ESTABLISHMENT)

Encls. No. \_\_\_\_\_

Copy of the above is forwarded to the Principal Govt; Postgraduate College, Mardan with reference to his letter No. 1747 dated 23.05.2015 with the remarks that this NOC is issued to the officer concerned subject to the condition that no leave implication will be involved and his classes at the College will not suffer and he will serve this Department for at-least five consecutive years after completion of his Ph.D course.

DY: DIRECTOR (ESTABLISHMENT)

*CP*  
ATTESTED



Office of The Principal  
GOVERNMENT POST GRADUATE COLLEGE  
MARDAN  
PH# 0937-9230033



No. 2564

Dated: 18/06/2016

To

The Director  
Higher Education  
Khyber Pakhtunkhwa, Peshawar

Subject: CORRIGENDUM IN GOVT: OF KHYBER PAKHTUNKHWA HIGHER  
EDUCATION DEPARTMENT NOTIFICATION NO. SO (C-II) HE/2-5//16/  
DATED. 14-06-2016.

Memo;

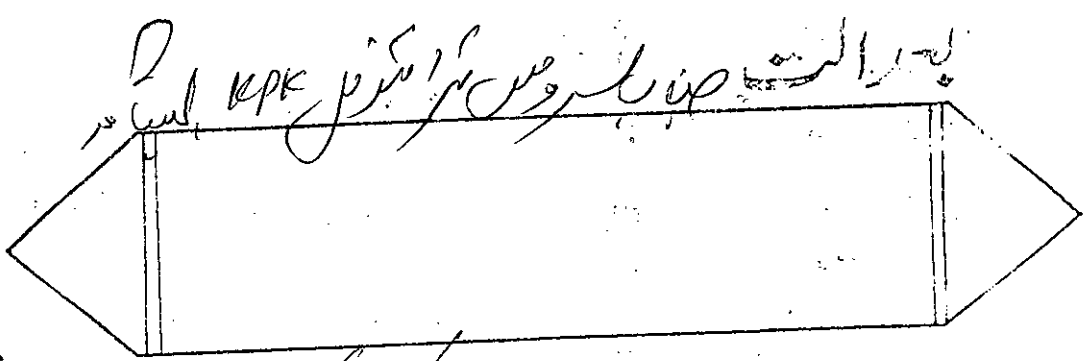
Please refer to Govt: of Khyber Pakhtunkhwa Higher Education Department notification No. SO(C-II)HE/2-5/16/ dated. 14-06-2016, wherein Mr. Abdul Malik lecturer in Chemistry of this college has been transferred to GDC Zaida at S.No. 49, while Mr. Murad Ali lecturer in Chemistry of GDC Zaida at S.No. 48 has been transferred to this college.

It is pertinent to mention that Mr. Abdul Malik lecturer in Chemistry of this college is involved in Ph.D from Abdul Wali Khan University Mardan. He also teaches chemistry to BS students and supervising research projects.

It is, therefore, requested that necessary corrigendum may kindly be made in the above noted notification and the services of Mr. Abdul Malik lecturer in Chemistry may kindly be retained at GPGC Mardan in the best public interest under transfer to this college be adjusted against the vacant post of lecturer in Chemistry available at this college.

Principal  
Govt: Post Graduate College  
Mardan

ATTESTED



پیر الٹ صہ پیر و صہ پیر میکرنل KPK ایس اے

موزخہ  
مقدمہ  
دعویٰ  
جرم

عبدالمالک سلیمانی ایس اے  
عبدالمالک سلیمانی ایس اے  
عبدالمالک سلیمانی ایس اے

مخبر  
مخبر  
مخبر

سروس اصل  
باعث تحریر آنکہ

مقدمہ مشدر جب عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ کے  
آن مقام کے قرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز  
مقرر کر کے قرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز  
وکیل صاحب کو رائشی نامہ کرنے و تقرر حالت ہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور صولی چیک درو پیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زر این 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 اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساختہ  
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جائنا التوائے مقدمہ کے سبب سے ہوگا۔  
کوئی رائشی مقام دور پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکورہ کریں۔ لہذا وکالت نامہ لکھنیا کہ سدر ہے۔

شردم 27 ماہ ستم 20

مقام  
کے لئے منظور ہے۔  
Accepted by  
Deos Khan Ader

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

**Service Appeal No. 1018/2016**

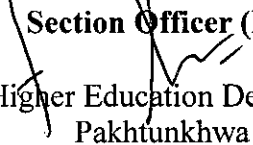
Mr. Abdul Malik..... (Appellant)

**VERSUS**

Govt. of Khyber Pakhtunkhwa through Secretary Higher Education, Archives & Libraries  
Department and others..... (Respondents)

**INDEX**

<b>S No.</b>	<b>Description of Dements</b>	<b>Annexure</b>	<b>Pages</b>
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2.	Reply to Application for Suspension		3
3.	Affidavit		4

  
**Section Officer (Litigation)**  
Higher Education Department Khyber  
Pakhtunkhwa Peshawar.

S.A.No.1018/2016

Mr. Abdul Malik.....Appellant.

Versus

Govt. of Khyber Pakhtunkhwa

Through secretary and Director,

Higher Education Peshawar..... Respondents.

Subject: Parawise comments on behalf of Respondents No.1, and 2.

Preliminary Objections.

Respectfully Sheweth.

1. That the appellant has got no locus standi/cause of action to file the instant writ petition
2. Transfer/posting is part and parcel of service. Under section 10 of Civil Servant Act any civil servant is liable to be transferred anywhere in the province in the best public interest.
3. That the appellant has not come to the court with clean hands and trying to conceal material facts from the honourable Tribunal.
4. That the instant service appeal is badly time barred.
5. That the instant service appeal is based on mis-conception/mis-statement of facts, hence, liable to be dismissed.
6. That honourable Tribunal lacks jurisdiction to entertain the instant service appeal.
7. That the appellant is estopped by his own conduct to file the instant service appeal.

Facts.

1. Correct that the appellant is working as Lecturer in chemistry in Higher Education Department.
2. Correct that appellant has been transferred from Govt.Post Graduate College, Mardan, to Govt. Degree College, Zaida, Swabi as substitute to Mr.Murad Ali, Lecturer in Chemistry. Moreover, the appellant has sufficient stay as he was posted on 19-6-2012 at GPGC Mardan. Posting/transfer at own choice is not the vested right of the appellant and was transferred in the best interest of the public. While respondent No.4 were working at GDC, Zaida, Swabi, since last six years.
3. Pertains to record.

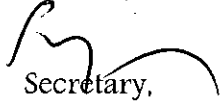
Grounds;

- a. Incorrect. The impugned notification dated 14.6.2016 has been passed by the respondent No.1 within the four corners of law.
- b. Incorrect. The petitioner has been treated in accordance with law, rules and policy. According to APT rules, any Govt. Servant is liable to be transferred anywhere in the province. Moreover, transfer/posting is not the vested right of the appellant.
- c. Already explained in para 2 on facts, hence needs no comments.
- d. Already explained in para b on grounds.
- e. Pertains to record.

- f. Pertains to record.
- g. The respondents may be allowed to raise additional grounds at the time of hearing of the instant case.

**Prayer.**

It is, therefore, humbly prayed that the instant service appeal is based on mis-conception/mis-statement and, hence, may graciously be dismissed with costs.



Secretary,

Higher Education Department.

Respondent No.1



Director,

Higher Education Department.

Respondent No.2

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No.1018/2016

Mr. Abdul Malik..... Appellant.

VERSUS

Govt of Khyber Pakhtunkhwa,  
Through Secretary and Director,  
Higher Education Department,  
Peshawar..... Respondents.

SUBJECT: -REPLY TO APPLICATION FOR SUSPENSION ON BEHALF OF RESPONDENTS NO.1,2

PRELIMINARY OBJECTIONS. -

Respectfully Sheweth. -

1. That the Applicant has got no cause of action/locus standi to file the instant application.
2. That the Applicant has concealed material facts from the Hon'able Tribunal.
8. That the Hon'able Tribunal lacks jurisdiction to entertain the instant appeal.
9. That the Applicant has not come to the honourable Tribunal with clean hands.
10. That the Applicant is estopped by his own conduct to file the instant application.
11. That the appeal is hit by doctrine of laches.
12. That the instant appeal is based on mis-conception/mis-statement of facts, hence, liable to be dismissed.

Reply;

- 6) Correct.
- 7) That content of parawise comments may graciously be considered as integral part of this reply.
- 8) Incorrect. There is good prima facie case in favour of the respondents with balance of convenience.
- 9) The balance of convenience does not lie in favour of the appellant.
- 10) If the impugned order is set aside the respondents will suffer irreparable loss.

Prayer.

It is, therefore, humbly prayed that the instant application is based on mis-conception/mis-statement and, hence, may graciously be dismissed with costs.

  
Secretary,

Higher Education Department.  
Respondent No.1

  
Director,

Higher Education Department.  
Respondent No.2



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

**Service Appeal No. 1018/2016**

Mr. Abdul Malik..... (Appellant)

**VERSUS**

Govt. of Khyber Pakhtunkhwa through Secretary Higher Education, Archives & Libraries  
Department and others..... (Respondents)

**AFFIDAVIT**

I, Asif Khan, Assistant Director (Litigation), Higher Education, Archives & Libraries Department, Government of Khyber Pakhtunkhwa, do hereby declare and affirm on oath, that the contents of joint para wise comments is correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

*AS* 15/2/17  
Depoent

CNIC No. 17301-6043213-9

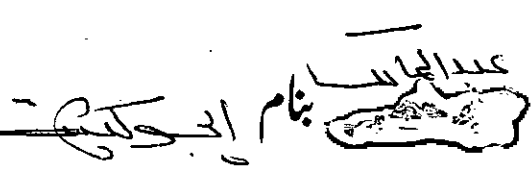


75717

ایڈوکیٹ/دستخط: \_\_\_\_\_  
بارنومل ابار ایسوسی ایشن نمبر: \_\_\_\_\_  
رابطہ نمبر: 0333 5265955

پشاور بار ایسوسی ایشن، خیبر پختونخوا

بعدالت جناب: مدرسہ اسلامیہ کراچی بدر کینجوا

منجانب: Respondent No 4	دعویٰ:
 عبدالجبار بنام ابوحکیم	علت نمبر:
	مورثہ:
	جرم:
	تھانہ:

### باعت تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی وجواب دہی کاروائی متعلقہ

آن مقام پشاور کیلئے روٹری کلب ایسٹ کو وکیل 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 تقرر ثالث و فیصلہ برصفت دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں ہر دستخط کرنے کا اختیار ہوگا، نیز بصورت 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 اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہو گا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ ہر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا وہ وکیل موصوف وصول کرنے کا حقدار ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ مندر ہے۔

المرقوم: 28-3-07

\_\_\_\_\_ گواہ شد \_\_\_\_\_

مقام \_\_\_\_\_ کے لئے منظور ہے۔

Registry No. 142  
23-25/17  
Dated: \_\_\_\_\_



Office of The Principal  
GOVERNMENT POST GRADUATE COLLEGE  
MARDAN  
PH# .0937-9230033



No. 2872

Dated: 20/02/2017

To

The Registrar  
Khyber Pakhtunkhwa Service Tribunal  
Peshawar

Subject: APPEAL NO. 1018 OF 2016 MR. ABDUL MALIK VS GOVT: OF  
KHYBER PAKHTUNKHWA.

Memo;

Please refer to appeal No. 1018. It is submitted that Mr. Abdul Malik lecturer in chemistry, who has been transferred from GPGC Mardan to GDC Zaida Swabi vide notification number No. SO(C-II)/2-5/16 dated 14-06-2016. It is stated that chemistry is core subject and BS program have been offered in this college and we are already in need of qualified teacher.

It is therefore submitted that the said officer may please be retained on the same post and Mr. Murad Ali may please be adjusted against vacant post as a number of vacant posts are available in this college.

*put up to the court  
with relevant appeal.*

*Ready  
23/2/17*

Principal  
Govt: Post Graduate College  
Mardan  
*20/02/17*

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal No. 1018/2016

Abdul Malik

Versus

Govt of KPK etc

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Dated: 17/04/2017

Through

Replying respondent no. 4



ROEEDA KHAN,

&

AFSHA MANZOOR,

Advocate,

High Court Peshawar.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**

**PESHAWAR**

*Service Appeal No. 1018/2016*

*Abdul Malik*

*Versus*

*Govt of KPK etc*

**PARAWISE COMMENTS ON BEHALF OF RESPONDENT NO.4**

*Respectfully Sheweth,*

*Preliminary objections: -*

- 1. That the appellant has no cause of action to file the instant appeal.*
- 2. That the order of the respondent no.1 is very much legal.*
- 3. That the appeal is not maintainable in its present form.*
- 4. Transfer / Posting is part and parcel of service, under section 10 of the Civil Servant Act "any Civil Servant*

*is liable to be transferred in the province in the best public interest”*

- 5. That the appellant has concealed the actual facts from this Honourable Tribunal.*
- 6. That the instant service appeal is badly time barred.*
- 7. That the appellant is stopped by his own conduct to file the instant appeal.*

*Reply on facts:*

- 1. Para No.1 of the facts is correct. The appellant is working as Lecturer in Chemistry in Higher education Department.*
- 2. Para no.2 is correct. The appellant has been transferred from Govt Post Graduate College Mardan to Govt degree College Zaida Swabi, while respondent no.4 has been transferred from Govt Degree College Zaida Swabi to Govt Post Graduate College Mardan. The appellant was transferred in the best interest of public. Posting and transfer at own choice is not the vested right of the appellant. Because according to Section 10 of the Civil Servant Act, any Civil Servant is liable to be transferred anywhere in the province, in the best public interest. Moreover the appellant has sufficient stay as he was posted on 19/06/2012 at Government*

Post Graduate College Mardan, while the respondent no.4 was working in Government Degree College Zaida Swabi, since last 6 years.

3. Para No.3 of the appeal pertains to record.

*Reply to Grounds of appeal:*

A. Para A of the appeal is incorrect, hence denied.  
The impugned order is in accordance with law and rules and in accordance with the superior courts judgments.

B. Para B of the appeal is incorrect, hence denied.  
The appellant has been treated in accordance with law, according to section 10 of any Civil Servant is liable to be transferred to anywhere in the province in the best public interest.

C. Para C of the appeal is incorrect, hence denied.  
Already explained in reply to Para B.

D. Para D of the appeal is incorrect, hence denied.  
Already explained in reply to Para B.

E. Para E of the appeal is incorrect, hence denied.  
Pertains to record.

F. Para F of the appeal is incorrect, hence denied.  
Pertains to record.

G. Para G of the appeal is incorrect, hence denied.  
Respondent no.4 may be allowed to raise additional grounds at the time of hearing of the instant appeal.

It is, therefore, humbly prayed that the instant appeal being against the law and facts, may be dismissed with costs throughout.

Dated: 17/04/2017

Through

Replying respondent no. 4



ROEEDA KHAN,

&

AFSHA MANZOOR,

Advocate,

High Court Peshawar



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal No. 1018/2016

Abdul Malik

Versus

Govt of KPK etc

REPLY TO THE APPLICATION FOR SUSPENSION

Respectfully Sheweth,

Preliminary objections: -

1. That the applicant has no cause of action to file the instant application.
2. That the order of the respondent no.1 is very much legal.
3. That the application is not maintainable in its present form.
4. Transfer / Posting is part and parcel of service, under section 10 of the Civil Servant Act "any Civil Servant is liable to be transferred in the province in the best public interest"
5. That the applicant has concealed the actual facts from this Honourable Tribunal.
6. That the instant application is badly time barred.

7. That the applicant is stopped by his own conduct to file the instant application.

Reply on facts:

1. Para No. 1 is correct.
2. Para no.2 is incorrect, hence denied. Contents of para wise comments may graciously be considered as part and parcel of the present reply.
3. Para No.3 is incorrect, hence denied. Prima facie case exists in favour of respondent no.4, with balance of convenience.
4. Para No.4 is incorrect. Balance of convenience does not lie in favour of the applicant.
5. Para No.5 is incorrect, hence denied. If the impugned order is set aside, it is respondent no.4, who would suffer irreparable loss.

Prayer:

Therefore, it is humbly prayed that the instant application being based on misconception, misstatement, hence may graciously be dismissed with costs.

Dated: 17/04/2017

Through

Replying respondent no. 4



ROEEDA KHAN,

&

AFSHA MANZOOR,

Advocate,

High Court Peshawar

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**

**PESHAWAR**

Service Appeal No. 1018/2016

Abdul Malik

Versus

Govt of KPK etc

**AFFIDAVIT**

I, MURAD ALI, lecturer in Chemistry, Government Post Graduate College, Mardan, do hereby solemnly affirm and declare on oath that the contents of the instant Written Statement / Para wise comments and reply to the application for suspension, are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.

**ATTESTED**

**Oath Commissioner**  
**Zahoor Khan Advocate**  
**Distt. Court Peshaw.**

20 APR 2017

*M. Ali*  
**Deponent**

10/12/20


ATTESTED

Notary Public  
State of New York  
Notary Commission No. 123456789

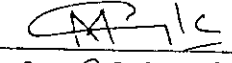
10/12/20

CERTIFICATE OF TRANSFER OF CHARGE

I/We received/hand over the charge of post of Lecturer In  
Govt: Post Graduate College Mardan, due to Transfer from GDC zaida  
Vide Govt: of Khyber Pakhtunkhwa, Higher Education, Archives & Libraries  
Department Notification No. SO (C-II) HE/2-5/16  
Dated. Peshawar, the \_\_\_\_\_-\_\_\_\_\_-2016, with  
effect from 01/07/2016 ~~four~~ Noon.

Signature of Relieved:   
Name in Block Letters: ABDUL MALIK  
Designation: Lecturer

Station: Govt: Post Graduate College, Mardan

Signature of Relieving:   
Name in Block Letters: MURAD ALI  
Designation: Lecturer in Chemistry


OFFICE OF THE PRINCIPAL, GOVT: POST GRADUATE COLLEGE, MARDAN

Endst: 2609

Dated: 15/07/2016

Copy for information to:

1. Director Higher Education, Khyber Pakhtunkhwa, Peshawar.
2. Section Officer (C-II) Govt: of Khyber Pakhtunkhwa, Higher Education,  
Archives & Libraries Department Notification No. SO (C-II) HE/  
2-5/16 Dated Peshawar, the \_\_\_\_\_-\_\_\_\_\_-2016.
3. District Accounts Officer Mardan.
4. Personal File of Officer/Official concerned

  
15.7.2016  
Principal  
Govt: Post Grad  
College, Mardan  
Mardan

Received a sum of Rs.  
500 in the title cash  
1018/16 Abdul Malik.

~~EP~~  
Darius Khan  
Advocate  
20/4/2017

①

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR

S.A NO 1018/2016

Abdul Malik.....Petitioner

**VERSUS**

Government of KPK and others.....Respondents

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REJOINDER TO PARAWISE COMMENTS  
OF RESPONDENT NO 1 & 2.

---

***Respectfully Sheweth:***

***PRELIMINARY OBJECTIONS;***

- 1) That reply to para/objection No 1 is incorrect the petitioner has filed appeal and not writ petition.
- 2) Reply to Para/objection no 2 is correct but the respondents have not followed the same section of law in instant case because respondent department has given NOC to appellant to remain on the station but have not shown the reason of exigency while issuing impugned notification.
- 3) That reply to para /objection no 3 is incorrect the appellant came with clean hands and concealed nothing , from this honorable tribunal.
- 4) That para/objection no 4 is incorrect the appeal is within time .
- 5) That para/objection no 5 is incorrect.
- 6) Para/objection No 6 is incorrect the tribunal has jurisdiction to entertain the instant appeal.

- (2)
- 7) Para/objection no 7 is incorrect.

REJOINDER TO PARAWISE COMMENTS ON FACTS:

- 1) Para No.1 needs no reply.
- 2) That in response of para No.2, it is submitted that Muhammad Yousaf Lecturer BPS-17, is posted at GPGC Mardan, on 23.05.2012, who has more stay at this college then why he was not transferred , there is no doubt that posting and transfer is not vested right of an servant but the rules and policy is also not allowing discrimination, moreover when there is vacant post according to the letter of respondent no 03 , and the Lecturer who has more stay at the college than appellant, then despite the NOC impugned transfer is against the public interest.
- 3) Para no 3 needs no reply.

REJOINDER TO PARAWISE COMMENTS ON GROUNDS:

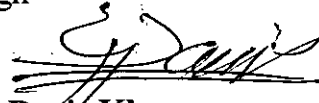
- a) Comments on Ground "A" is incorrect and that of ground of appeal is correct.
- b) Comments on Ground "B" is incorrect, moreover the authority must exercise its power justly ,fairly and in advancements of law and rules which is not exercised by them as such , they have issued another notification dated 05.10.2016 through which they have transferred their near and dears (copy of notification is attached), is the evidence of the their malafide intention.
- c) Submission already made in para no 2 of facts, needs no reply.
- d) Already replied in above paras.
- e) Comments on Ground E to G need no reply .



It is therefore, most humbly prayed that on acceptance of this rejoinder, the appeal of the appellant may kindly be accepted/ allowed.

Appellant

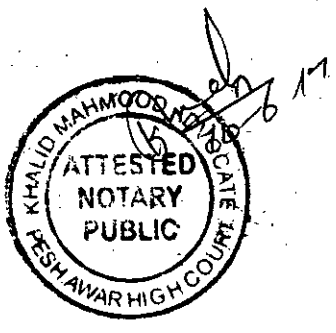
Through



**Daris Khan**  
Advocate High Court

**AFFIDAVIT**

I, Daris Khan Advocate (counsel for petitioner) do hereby affirm and declare as per information furnished by my client that the contents of the instant **Rejoinder** are true and correct and belief and nothing has been concealed from this Hon'ble Court.

  
Deponent



4

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**GOVT. OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES &  
LIBRARIES DEPARTMENT**

Dated: Peshawar October 5<sup>th</sup>, 2016.

**NOTIFICATION**

**NO. SO (COLLEGES-II)HED/2-5/2016:** The Competent Authority is pleased to order transfer of the following lecturer in various subjects mentioned below, with immediate effect in the best public interest:

S.NO	Name of Officer	From	TO	Remarks
1.	Mr. Rashid Zubair lecturer in Computer Science	GDC Gundaf Swabi	GDC Ghari Kapoora	Vice S. No. 2
2.	Mr. Fazli Wahid lecturer in Computer Science at	GDC Ghari Kapoora	GDC Gundaf Swabi	Vice S. No. 1
3.	Mr. Fiaz Ur Rehman lecturer in Maths	GPGC Mansehra	GPGC Abbotabad	Vice S. No. 4.
4.	Mr. Abdul Jalil lecturer in Maths at	GPGC Abbotabad	GPGC Mansehra	Vice S. No. 3
5.	Muhammad Ayaz lecturer in English	GDC Palai Malakand	GDC Thana Malakand	Vice S. No. 6
6.	Mr. Altaf ur Rehman lecturer in English	GDC Thana Malakand	GDC Palai Malakand	Vice S. No. 5
7.	Mr. Naseeb Rawan lecturer in Chemistry	GDC Matta Swat	GDC Mingora Swat	AVP.
8.	Mr. Asim Abbas lecturer in Statistics	GDC Sabirabad Karak	GDC Takht e Nasrati, Karak	Mutual transfer Vice S. No. 9.
9.	Mr. Abdul Ghaffar	GDC Takht e Nasrati, Karak	GDC Sabirabad Karak.	Mutual transfer Vice S. No. 8.
10.	Mr. Amir lecturer in English	GPGC Charsadda	GDC Shabqadar	AVP.
11.	Mr. Malik Junaid Ahmad lecturer in English	GDC Oghi Mansehra	GPGC Mansehra	Vice S. No. 12.
12.	Mr. Hashir Iftikhar, lecturer in English at	GPGC Mansehra	GDC Oghi Mansehra	Vice S. No. 11.
13.	Muhammad Nasir Abbas lecturer in Physics	GDC Paharpur D.I.Khan	GDC NO. 2 D.I.Khan	Vice S. No. 14.
14.	Mr. Altaf Ahmad lecturer in Physics at	GDC No. 2 D.I.Khan	GDC Paharpur D.I.Khan	Vice S. No. 13.
15.	Mr. Mudassar Khan lecturer in Comp. Science	GDC Ghiljo Orakzai Agency	GPGC Karak	AVP
16.	Mr. Shehryar lecturer in Chemistry	GDC Mir Ali NWA	GPGC Bannu	AVP
17.	Mr. Farhan Khan, lecturer in Comp. Science	GDC Takht Bhai	GDC Dargai	Vice S. No. 18
18.	Muhammad Fawad lecturer in Comp. Science	GDC DArgai	GDC Takht Bhai	Vice S. No. 17

E:\V\Gates\4\Transf Transfer, Posting transfer and. from 2016.doc

(5) (P)

19.	Mr. Zia Ud Din lecturer in Maths	GDC Agra Malakand	GDC Totakan Malakand	AVP
20.	Mr. Qaiser Zaman lecturer in Biology	GDC Daggar Buner	GPGC Dargai Malakand	AVP
21.	Mr. Tilawat Shah	GDC Barkhalozai Bajur Agency	GPGC Mardan	AVP

Note: No T.A / D.A is allowed.

SECRETARY TO  
GOVT. OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION DEPARTMENT

ENDST: NO. & DATE EVEN:

Copy of the above is forwarded to the:

1. Director, Higher Education, Khyber Pakhtunkhwa, Peshawar.
2. Director FATA Education.
3. All Principals concerned.
4. All District & Agency Accounts Officers concerned.
5. Officers concerned.

  
 (RAFI ULLAH KHAN)  
 SECTION OFFICER (COLLEGES-II)

0989-555336

قیمت 50 روپے	ایڈوکیٹ:	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
	بار کونسل ایسوسی ایشن نمبر:	24402
	رابطہ نمبر:	
	03339147593	

بعدالت جناب: سروس ٹریبونل حیدر خیونکوٹ اور

مخانب: مسول اللہ مبارک	دعویٰ:
عبدالملک	علت نمبر:
بنام	مورخہ:
حکومت	جرم:
	تھانہ:

**باعت تحریر آتکہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کا کوئی متعلقہ  
 آن مقام کے لیے محمد نعیم یوسفزئی کو وکیل 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 تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق  
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت 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 اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب  
 مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا  
 دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے  
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 25/01/18

بند ————— واہ شد ————— بند

مقام: حیدر خیونکوٹ کے لیے منظور ہے۔

Muhammad Naeem Yousafzai  
 Advocate.

نوٹ: اس وکالت نامہ کی فونو کاپی ناقابل قبول ہوگی۔

Muhammad Yousafzai  
 Res No. 5

Hidayat Ali  
 Res No. 6

11030

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

C.M No. \_\_\_\_\_/2017

IN

Service Appeal No. 1018 /2016

Abdul Malik.....versus.....Govt of KPK and others


Khyber Pakhtunkhwa  
Service Tribunal  
Diary No. 974  
Dated 17/11/2017

**INDEX**

S.No.	Description of documents.	Annexure	Pages.
1.	Application for impleadment		1-2
2.	Affidavit.		3
3.	Copies of Relevant documents		4-5

Applicant / Appellant

Through

  
**Daris Khan**  
Advocate High Court

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

C.M No. \_\_\_\_\_/2017

IN

Service Appeal No. 1018 /2016

Abdul Malik.....versus.....Govt of KPK and others

APPLICATION FOR THE IMPLEADMENT  
OF THE FOLLOWING LECTURERS AS  
RESPONDENTS

- I) Hidayat Ali Lecturer in chemistry  
Government Post Graduate College  
Mardan.
- II) Muhammad Yousaf Lecturer in  
chemistry Government Post Graduate  
College Mardan

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RESPECTFULLY SHEWETH ;

1. That above titled case is pending adjudicating before this honorable tribunal which is fixed for 04.12.2017.
2. That the applicant has been transferred by respondent department from government post graduate college Mardan to GDC, Zaida, Swabi on 14.06.2016.
3. That the above mentioned lecturers have been posted against their posts since 01.04.2011 and 23.05.2011 respectively while applicant

2

was posted on 19.06.2012 at GPGC Mardan, therefore transfer of applicant while ignoring the aforesaid lecturers is the clear violation of the rules, precedents and policy of transfer. (Copy of relevant documents are attached).

4. That the above mentioned lecturers are proper / necessary parties in the instant case therefore they may kindly be brought at the panel of respondents.

It is therefore most humbly prayed that on acceptance of this application, this honorable tribunal may be pleased to array/ implead the said lecturers as respondents in the above mentioned case.

Applicant / Appellant

Through

  
Daris Khan

Advocate High Court



3

BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR.

Service Appeal No.1018/2016

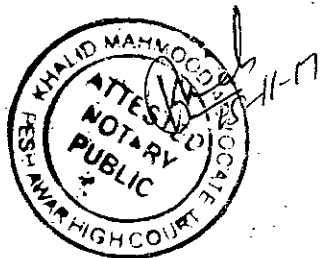
Abdul Malik..... Appellant


Versus

Govt of KPK & others..... Respondents

AFFIDAVIT

I, Abdul Malik son of Ameer Khan, Lecturer in Chemistry GDC, Zaida, Swabi R/o Kandary, P.O. Kandary, Tehsil and District Mardan (appellant) do hereby affirm and declare on oath that 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 Tribunal.



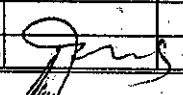
  
Deponent  
CNIC No.16101-6662714-1

(4)

OFFICE OF THE PRINCIPAL GOVERNMENT POST GRADUATE COLLEGE, MARDAN  
STAFF STATEMENT FOR THE MONTH OF April/2016

Part-E

Sr.#		Name of Officer	Designation	Subject	Against the Charge of vacant post	Qualification	Domicile	Date of Birth	Date of 1st Appointment	D/O Promotion to Present Post	D/O Taking Charge In this College	Cell No
55	28	Post Vacant	Asstt: Prof:		BPS-18							
56	29	Post Vacant	Asstt: Prof:		BPS-18							
57	30	Post Vacant	Asstt: Prof:		BPS-18							
58	31	Post Vacant	Asstt: Prof:		BPS-18							
59	32	Post Vacant	Asstt: Prof:		BPS-18							
60	33	Post Vacant	Asstt: Prof:		BPS-18							
61	34	Post Vacant	Asstt: Prof:		BPS-18							
62	35	Post Vacant	Asstt: Prof:		BPS-18							
63	36	Post Vacant	Asstt: Prof:		BPS-18							
64	37	Post Vacant	Asstt: Prof:		BPS-18							
65	38	Post Vacant	Asstt: Prof:		BPS-18							
66	39	Post Vacant	Asstt: Prof:		BPS-18							
67	1	Mr. Mujahid Shah	Lecturer	Islamiyat	BPS-17	M.A. Islamiyat	Charsadda	14-04-1976	02-11-2005		22-09-2010	0301-5353624
68	2	Mr. Fazil Raziq	Lecturer	Statistics	BPS-17	M.Sc. Statistics	Peshawar	13-06-1982	15-12-2007		01-06-2011	0345-9088816
69	3	Mr. Javed Iqbal	Lecturer	English	BPS-17	M.A. English	Mardan	20-02-1978	01-01-2009		01-01-2010	0300-9149494
70	4	Mr. Kiramat Shah	Lecturer	Political Sci:	BPS-17	M.A. Political Sci	Mardan	09-03-1981	01-01-2009		01-07-2010	0321-9112042
71	5	Mr. Muhammad Zaman	Lecturer	Mathematics	BPS-17	M.Sc. Maths	Bajaur	28-03-1982	14-03-2009	Ex-Pakistan Leave	07-08-2009	
72	6	Mr. Hafiz Mursalen	Lecturer	Islamiyat	BPS-17	M.A. Islamiyat	Charsadda	01-04-1980	26-01-2010		26-01-2010	0345-3753803
73	7	Mr. Hafiz Muhammad Zakriya	Lecturer	Botany	BPS-17	M.Sc. Botany	Mardan	07-03-1984	08-03-2010		08-03-2010	0345-9049984
74	8	Mr. Bakhtawar Khan	Lecturer	Botany	BPS-17	M.Sc. Botany	Mardan	10-01-1980	10-03-2010		11-03-2010	0312-9144103
75	9	Mr. Ihsanullah	Lecturer	Chemistry	BPS-17	M.Sc. Chemistry	Mardan	05-02-1984	01-04-2010	Ex-Pakistan Leave	05-04-2010	0344-3330960
76	10	Mr. Hidayat Ali	Lecturer	Chemistry	BPS-17	M.Sc. Chemistry	Mardan	09-04-1985	01-04-2011		01-04-2011	0332-5226067
77	11	Mr. Shakil Ahmad	Lecturer	Physics	BPS-17	M.Sc. Physics	Mardan	10-03-1981	18-06-2011		18-06-2011	0313-5735560
78	12	Mr. Abdul Salam	Lecturer	Islamiyat	BPS-17	M.A. Islamiyat	Swabi	15-03-1985	12-11-2010		13-08-2011	0332-9855903
79	13	Mr. Mujeeb ur Rahman	Lecturer	Islamiyat	BPS-17	M.A. Islamiyat	Nowshera	15-04-1981	01-02-2010		16-08-2011	0332-5415657
80	14	Mr. Munir Khan	Lecturer	Urdu	BPS-17	M.A. Urdu	Mardan	15-01-1976	01-01-2009		01-10-2011	0345-4455356
81	15	Mr. Nazir Muhammad	Lecturer	English	BPS-17	M.A. English	Bajaur	05-02-1986	04-11-2010		01-10-2011	0300-9502985

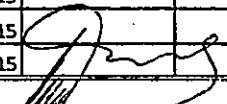
  
Principal,  
Govt: Post Graduate College,  
Mardan

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OFFICE OF THE PRINCIPAL GOVERNMENT POST GRADUATE COLLEGE, MARDAN  
STAFF STATEMENT FOR THE MONTH OF April/2016

Part-E

Sr.#		Name of Officer	Designation	Subject	Against the Charge of vacant post	Qualification	Domicile	Date of Birth	Date of 1st Appointment	D/O Promotion to Present Post	D/O Taking Charge In this College	Cell No
82	16	Mr. Fazli Haq	Lecturer	English	BPS-17	M.A. English	Mardan	03-07-1979	24-09-2009		01-10-2011	0342-6993889
83	17	Mr. Rahat Ullah	Lecturer	Zoology	BPS-17	M.Sc. Zoology	Mardan	05-04-1981	29-10-2011		29-10-2011	0333-9867311
84	18	Mr. Ghazanfar Mujtaba	Lecturer	Zoology	BPS-17	M.Sc. Zoology	Haripur	29-08-1983	01-11-2011		01-11-2011	0346-5376719
85	19	Mr. Muhammad Asad Khan	Lecturer	English	BPS-17	M.A. English	Mardan	23-03-1981	06-01-2012		06-01-2012	0346-6534329
86	20	Mr. Farooq Ahmad	Lecturer	Statistics	BPS-17	M.Sc. Statistics	Mardan	03-02-1981	01-01-2009		12-05-2012	0346-8329811
87	21	Mr. Muhammad Yousaf	Lecturer	Chemistry	BPS-17	M.Sc. Chemistry	Mardan	02-03-1986	23-05-2012		23-05-2012	0314-9670861
88	22	Mr. Abdul Malik	Lecturer	Chemistry	BPS-17	M.Sc. Chemistry	Mardan	07-05-1981	01-01-2009		19-06-2012	0345-9059403
89	23	Mr. Hakim Khan	Lecturer	H.P.E	BPS-17	M.Sc. H.P.E	Mardan	15-09-1956	20-11-1986		20-11-1986	0314-5759160
90	24	Mr. Bashir Ahmad	Lecturer	H.P.E	BPS-17	M.Sc. H.P.E	Mardan	24-01-1968	01-09-1994		01-02-2006	0302-8336065
91	25	Mr. Ahmad Ali	Librarian	Library Science	BPS-18	M.L.I. Science	Bajaur	25-03-1981	17-11-2003			0306-5904887
92	26	Mr. Muhammad Khalid	Lecturer	Physics	BPS-17	M.Sc. Physics	Nowshera	10-11-1987	10-08-2012		10-08-2012	0300-5772466
93	27	Mr. Asif Shah	Lecturer	English	BPS-17	M.A. English	Mardan	15-02-1983	29-08-2012		30-08-2012	0345-9340083
94	28	Mr. Musarrat Shah	Lecturer	English	BPS-17	M.A. English	Mardan	10-04-1980	31-08-2012		31-08-2012	0346-9313221
95	29	Mr. Fazal Rasheed	Lecturer	Pashto	BPS-17	M.A. Pashto	Malakand	02-03-1975	06-09-2006		01-09-2012	0344-9190989
96	30	Mr. Ishaq Ahmad	Lecturer	Computer Sci.	BPS-17	M.Sc. Comp: Sci.	Mardan	06-03-1983	13-12-2012		13-12-2012	0300-9302477
97	31	Mr. Muhammad Ishaq	Lecturer	Zoology	BPS-17	M.Sc. Zoology	Mardan	17-08-1988	27-09-2012		27-09-2012	0314-9614798
98	32	Mr. Alamgir Khan	Lecturer	Computer Sci.	BPS-17	M.Sc. Comp: Sci.	Swabi	27-11-1981	26-01-2011		18-02-2013	0301-8339794
99	33	Mr. Muhammad Israr	Lecturer	Botany	BPS-17	M.Sc. Botany	Mardan	20-03-1985	02-07-2013		02-07-2013	0346-5011752
100	34	Mr. Mohammad Ibrahim	Lecturer	Geography	BPS-17	M.Sc. Geography	Mardan	04-11-1985	20-09-2011		07-06-2013	0332-9857440
101	35	Mr. Mudassir Shah	Lecturer	Zoology	BPS-17	M. Phil. Zoology	Mardan	11-03-1985	16-09-2011		14-01-2015	0346-7778737
102	36	Mr. Momin Shah	Lecturer	Statistics	BPS-17	M.Sc. Statistics	Peshawar	17-02-1987	24-01-2015		24-01-2015	0346-9049160
103	37	Mr. Imad Khan	Lecturer	Statistics	BPS-17	M.Sc. Statistics	Nowshera	31-03-1990	30-01-2015		30-01-2015	0314-9470853
104	38	Mr. Muhammad Saeed	Lecturer	Economics	BPS-17	M.Sc. Economics	Mardan	19-04-1985	29-04-2015		29-04-2015	0334-5438440
105	39	Mr. Zulqarnain	Lecturer	English	BPS-17	M.A. English	Mardan	21-01-1986	21-05-2015		21-05-2015	0313-9243003
106	40	Mr. Taqwim ul Haq	Lecturer	Urdu	BPS-17	M.A. Urdu	Mardan	01-03-1980	29-05-2015		29-05-2015	0345-9280979

  
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