

26.3.2013

Counsel for the appellant present and heard. Since there is no final order in the appeal, as such, the same is not maintainable under section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974. The appeal is accordingly dismissed in limine with no order as to costs. File be consigned to the *record*.

ANNOUNCED
26.3.2013


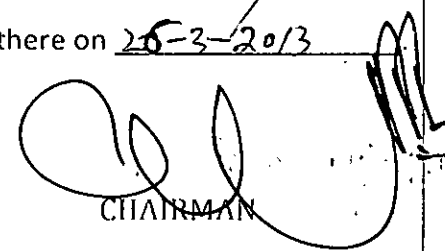

MEMBER
Camp Court D.I.Khan

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 545/2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	18/03/2013	<p>The appeal of Mr. Zaheer Ahmad presented today by Mr. Gul Taiz Khan Marwat Advocate may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	22-3-2013	<p>This case is entrusted to Touring Bench D.I.Khan for preliminary hearing to be put up there on <u>25-3-2013</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHAWA
PESHAWAR

Service Appeal No. 545 /2013.

Zaheer Ahmad

.....APPELLANT

VERSUS


The Govt: Khybar Pakhtunkhawa Province through Chief Secretary,
Civil Secretariat Peshawar ETC

.....RESPONDENTS

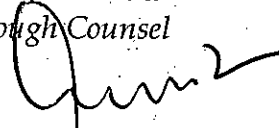
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Appellant
Your humble Petitioner


Zaheer Ahmad
Through Counsel

Dated. 16 /03/2013


Gul Tiaz Khan Marwat
Advocate, High Court
D.I.Khan

I

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHAWA PESHAWAR

Service Appeal No. 545 /2013

Zaheer Ahmad mechanical Shop Assistant Government Technical and Vocational Centre Ghazi District Harripur presently Posted on detailment basis in Government Technical and Vocational Centre Tank.

Cell # 0312-378-7722.....APPELLANT

VERSUS

S.W.F. PESHAWAR
558
18-3-2013

1. The Govt: of Khyber Pakhtunkhawa Province through Chief Secretary Civil Secretariat Peshawar.
2. The Secretary Education KPK Civil Secretariat, Peshawar.
3. The Director General Technical Education, and main power KPK, Directorate Khyber Road, Peshawar.
4. The Principal of Government Technical and Vocational Centre Ghazi District Harripur (Hazara)
5. The Principal of Government Technical and Vocational Centre Tank.

...RESPONDENTS

APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL
ACT, 1974 AGAINST THE ACTIONS/IN-ACTIONS AND
ORDER OF NON-DISPOSAL OF REPRESENTATION OF
APPELLANT WITHIN STATUTORY PERIOD OF NINETY (90)
DAYS VIDE WHICH REPRESENTATION/DEPARTMENTAL
APPEAL OF APPELLANT DATED 05.12.2012 FOR POSTING
AND TRANSFER OF THE APPELLANT HAVE BEEN
WITHHELD BY THE RESPONDENT No. 3.

18/3/13

Jan

Respectfully Sheweth,

1. That the Appellant is an employee of in BPS-6 and is posted as such vide appointment order dated 22.07.2003 whereafter services of the Appellant was regularized vide order Endst: No. 4476(1-3) dated 29.08.2007 in Ghazi District Haripur and the Appellant is performing duties as such in Ghazi District Haripur since last six years. Copies of appointment order and regularization order are enclosed as **ANNEXURE "A & B"** respectively.
2. That recently the Appellant transfer and posting order to Tank has been issued by Respondent No. 3 on detailment basis vide order No.2856(1-3) dated 11.05.2012 and in compliance with the transfer and posting order mentioned above, the Appellant assumed the charge of post at Tank on 07.05.2012 and is performing duties as such to the entire satisfaction of his superiors. Copies of transfer order on detailment basis, charge relinquishment report dated 16.05.2012 and arrival report dated 17.05.2012 are enclosed as **ANNEXURE "C, D & E"** respectively.
3. That before the order of transfer and posting at Tank on detailment basis, the Appellant submitted various applications alongwith detail of vacant posts available in the area against which the Appellant may be transferred and posted/adjusted but no action has so far been taken by the Respondents. Copies of applications and statement showing the vacant posts are enclosed as **ANNEXURE "F,G,H & J"** respectively.
4. That the Appellant then preferred Representation on 05.12.2012 to Respondent No. 3 wherein the Appellant made a very humble request to consider the case of Appellant for transfer to near station, but no action upon the representation of the Appellant has been taken so far. Copy of Representation is enclosed as **ANNEXURE "K"**

Amir

5. That besides the non redressal of grievances of Appellant of his transfer and posting, Respondent No. 5 has not only stopped the monthly pay of the Appellant but prohibit the Appellant to attend the College/Centre to perform his duty or to mark his attendance in the attendance register and has took over the attendance register in his own custody so as deprive the Appellant to mark his presence and to this effect the Appellant submitted representation ^{on 4.2.2013} before Respondent No. 3 for seeking directions to Respondent No. 4 to release the monthly pay of Appellant stopped and withheld from the month of January, 2013 but action has also been taken by Respondent No. 3 on the representation/application of Appellant till today. Copy of representation ^{dt 4.2.2013} is enclosed as **ANNEXURE "L"**.

6. That having no other speedy and efficacious remedy, the Appellant is obliged to knock the door of this Hon'ble Tribunal under its appellate jurisdiction inter alia on the following grounds:-

GROUND:

A. That non consideration of request for transfer/posting of the Appellant is against law, rules and regulations holding the field and is violative of the Notification of Provincial Government _____ bearing No. **SOR-VI/E&AD/1-4/2908/VOL-VII DATED 11.09.2009** wherein normal tenure of posting/transfer is three years for settled area but it is very funny and surprise that the Appellant case is not being considered in the light of above referred notification of the Provincial Government, therefore all the actions/in-actions of the Respondents individually and collectively is/are void, abinitio, arbitrary, malafide, unconstitutional, without lawful authority and without jurisdiction. Copy of notification is enclosed as **ANNEXURE "G"**

June 2

- B.** That non-consideration of the request of transfer of Appellant is the out come of political influence which off course amounts, nepotism, favoritism and victimization which is thus against the provisions of Rules called as KPK Government Servants (Conduct) Rules, 1987.
- C.** That the impugned action/order of Respondent No. 5 to prohibit the Appellant either to perform his duty or to mark his Attendance/presence in the register of attendance is against law and facts and is high handedness of the Respondent No.5.
- D.** That similarly the actions/in-actions of Respondent No.4 to stop and withheld the monthly pay/salary of the Appellant is against the law and rules as under the provisions of fundamental rights guaranteed ~~under~~^{of} the Constitution, the Appellant is entitled for equal protection of law but the Appellant has been treated otherwise and he has been deprived of his vested fundamental rights of monthly pay/salary.
- E.** That as explained above, the order of transfer/posting of Appellant at the one and same station at Ghazi District Harripur (Hazara) for long period of six years is malafide, arbitrary and this Hon'ble Tribunal being creation of Constitution is under obligation to safeguard and secure the fundamental rights of the civil servants of the Province and to correct the failure, faults, dereliction of duty, latches, defects in jurisdiction, denial of justice, bias or disability and to set aside/struck down illegal and order without lawful authority of the Departmental Authorities/Public Functionaries.
- F.** That counsel for the Appellant may please be allowed to raise additional ground during the course of arguments.


June 2

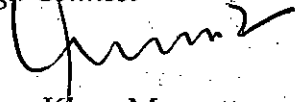
It is, therefore, humbly prayed on acceptance this appeal, this Hon'ble Tribunal may very graciously be pleased to accept the appeal of the Appellant and

- i. To issue order/directions of declaring the order/action of Respondents individually and collectively of non-issuance of transfer/posting order of Appellant from Ghazi District Harripur to near Station to the Home District of Appellant is to be void, illegal, malafide, contrary to law, without lawful authority and without jurisdiction and as a consequence thereof direction/order may please be issued directing the Respondents to issue transfer and posting order of Appellant to any other nearer station to the Home District (D.I.Khan) of the Appellant.
- ii. To issue order direction to Respondent No. 5 allow the Appellant to perform his duty in Government Technical and Vocational Centre Tank and to further allow the Appellant to mark his presence/attendance in the attendance register and
- iii. To issue directions to Respondent No. 4 to release the monthly pay/salary of the Appellant forthwith withheld/stop by him from the month January ,2013 and further to resume to supply/payment of monthly pay to the Appellant till the disposal of Appeal.

Any other relief deemed appropriate in the prevailing circumstances may also be granted.

Your humble Appellant


Zaheer Ahmad
Through Counsel


Gul Tiaz Khan Marwat
Advocate, High Court
D.I.Khan

Dated. 16-3-2013

CERTIFICATE

Certified on oath that no Appeal on the subject has earlier been filed before this Hon'ble Tribunal.

Appellant 

VERIFICATION:

Verified on 16.15.....this day of March, 2013 that the contents of appeal are true and correct.


Appellant

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHAWA**PESHAWAR**

Service Appeal No. _____/2010

Zaheer Ahmad

.....**APPELLANT****VERSUS**The Govt. of Khyber Pakhtunkhawa Province through Chief Secretary,
Civil Secretariat Peshawar ETC.....**RESPONDENTS****AFFIDAVIT**

I, Zaheer Ahmad s/o Jameel Ahmad Shop Assistant on detailment basis Govt. Technical & Vocational Centre, Tank, the Appellant do hereby solemnly affirm and declare on Oath that the contents of Appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.


Deponent

Attested by



BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHAWA
PESHAWAR

C.M. A No. _____ /2013

In

Service Appeal No. _____ /2013

Zaheer Ahmad

..... PETITIONER

VERSUS

The Govt: of Khybar Pakhtunkhawa Province through Chief Secretary,
Civil Secretariat Peshawar ETC

..... RESPONDENTS

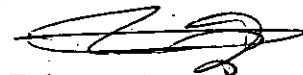
APPLICATION FOR INTERIM RELIEF AND MAINTENANCE
OF STATUS QUO TILL THE DISPOSAL OF APPEAL

Respectfully Sheweth,

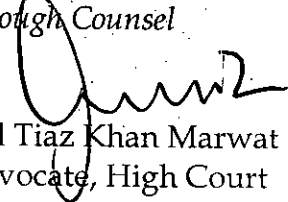
1. That by filing Appeal, the Appellant/Petitioner has challenged the actions/inactions of Respondents of non-issuance of transfer and posting order of Petitioner from Ghazi District Harripur to any other nearer station to the Home District (D.I.Khan) of Appellant/Petitioner.
2. That the Appellant/Petitioner has a prima-facie good case and there is every likelihood of its acceptance.
3. That the balance of convenience is also lies in favour of Appellant/Petitioner.
4. That there would be irreparable loss to the Appellant/Petitioner if the Appellant/Petitioner order of posting and transfer on detailment basis of Appellant at Govt: Technical and Vocational Centre Tank is recalled/withdrawn or disturbed and the object and purpose of filing of the accompanied appeal would become fruitless and illogical.

In view of the submissions made above, it is, therefore, humbly prayed that on acceptance this petition this Hon'ble Tribunal may very graciously pleased to issue temporary injunction/status quo order restraining the Respondents not to recall/withdraw or disturbed the posting order of Petitioner at Govt: Technical & Vocational Centre Tank and status quo may please be maintained till the disposal of Appeal.

Your humble Petitioner



Zaheer Ahmad
Through Counsel



Gul Tiaz Khan Marwat
Advocate, High Court
D.I.Khan

Dated. 16.3.2013

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHAWA
PESHAWAR

C.M. A No. _____ /2013
In
Service Appeal No. _____ /2013

Zaheer Ahmad

.....PETITIONER

VERSUS

The Govt: of Khybar Pakhtunkhawa Province through Chief Secretary
Civil Secretariat Peshawar ETC

.....RESPONDENTS

AFFIDAVIT

I, Zaheer Ahmad s/o Jameel Ahmad Shop Assistant on detailment basis Govt: Technical & Vocational Centre, Tank, the Appellant do hereby solemnly affirm and declare on Oath that the contents of petition are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.


Deponent

Attested by



A

9

DIRECTORATE OF TECHNICAL EDUCATION
AND MANPOWER TRAINING, N.W.F.P,
PESHAWAR.

OFFICE ORDER.

No. DTE & MT /

Consequent upon the recommendation of the Departmental Selection Committee, the following candidate (s) is / are hereby appointed as Shop Assistant (Mechs) on Contract Basis in the Basic Pay Scale No. 05 plus usual allowances as admissible under the rules, and posted in the College / Institute / Centre mentioned below from the date of taking over charge and subject to the terms and conditions stated as under:-

Sr. No.	Name & Father's Name / Full address.	Posted at.
1	Mr. Zaheer Ahmad S/o Jamil Ahmad, Tehsil & Distt: D.I. Khan.	Government Technical & Vocational Centre (Boys) Ghazi.

TERMS AND CONDITIONS:

- 1- His appointment is purely temporary on contract basis for a period of one year from the date of taking over charge.
- 2- His service will be liable to termination on one-month notice from either side. In case of resignation without prior notice, one month's pay in lieu thereof will be forfeited.
- 3- He will be governed by such orders and rules as prescribed by the Government and issued from time to time for the category of Government Employees to which he belongs.
- 4- The appointment of the candidate mentioned above is subject to the condition that he is having Domicile of NWFP.
- 5- He will during his period of service, be eligible for all concessions in relation to medical attendance and treatment for himself and his family as laid down in the WEST Pakistan Government Servants (Medical Attendance) Rules, 1959, as amended from time to time and to such leave as is admissible to a civil servant under the North West Frontier Province Civil Servants Revised Leave Rules, 1981.
- 6- He will have to produce a certificate of Medical fitness from the concerned Medical Superintendent / Agency Surgeon of the respective area within a week time of assumption of charge.
- 7- No TA/DA is allowed on his first appointment.
- 8- He will have to perform any duty assigned to him in connection with the affairs of this Department.
- 9- His appointment will also be subject to the satisfactory report on the verification of his character and antecedents.
- 10- He will execute an agreement for contractual appointment on prescribed proforma (Copy enclosed).

If he agrees to accept the offer of appointment on the above terms and conditions, they should report to the respective Principal within 30 days of the issue of this order failing which this appointment order shall stand cancelled.

*There is no vacant post of
S/Asst at this Centre
Therefore this order cannot be
accepted*

*Attest
Principal*

Principal
Govt. Technical & Vocational
Centre Ghazi

(MUHAMMAD TARIQ AWAN)

DIRECTOR

*Ref the DTE order no. 1533 dated 28/3
The office is closed
is accepted*

P.T.O.

Tech. & Vocational
Centre Ghazi
28/3/07

Endst.No.DTE&MT/1441(1)

Dated 22/03/07/20

Copy forwarded for Information and n/action to:-

- 1- Accountant General NWFP., Peshawar.
- 2- The concerned District / Agency Accounts Officer.
- 3- The Principal concerned.
- 4- Candidate concerned.

DEPUTY DIRECTOR (ADMN)

B

10

**DIRECTORATE OF TECHNICAL EDUCATION,
AND MANPOWER TRAINING, N.W.F.P,
PESHAWAR.**

OFFICE ORDER:-

NO.DTEMT/ESTT:/

In pursuance of the North West Frontier Province Civil Servants (Amendment) Act, 2005, the undersigned being the Competent Authority is pleased to regularize the services of Mr. Zaheer, Shop Assistant, Government Technical & Vocational Centre (Boys) Ghazi, who was earlier appointed on contract basis with effect from the date of appointment. He will be governed by the NWFP, Civil Servants (Amendment) Act 2005 and the rules made there under.

**(MUHAMMAD TARIQ AWAN)
DIRECTOR.**

Endst. NO.DTEMT/ESTT:/ 4476 (1-3) Dated 29/8/2007.

Copy forwarded to:-

1. The District Accounts Officer, Haripur.
2. The Principal, Government Technical & Vocational Centre (B) Ghazi.
3. Official concerned.


**(ENGR: NASIRUD-DIN KHATTAK)
DEPUTY DIRECTOR (ADMN)**

*Attest
Juz
Advocate*

Tele: 091-9213027



GOVERNMENT OF KHYBER PUKHTOON KHWA.
DIRECTORATE GENERAL TECHNICAL EDUCATION
AND MANPOWER TRAINING.

OFFICE ORDER.

Mr. Zaheer Ahmed, Shop Assistant, Govt. Technical & Vocational Center (B), Ghazi is hereby directed to work at Govt. Technical & Vocational Center (B), Tank till further orders.

DIRECTOR GENERAL.

Endst: No.DGTE&MT/Estt/ 2856(1-3) Dated 11/5/2012

Copy forwarded for information and n/action to: -

1. Principal, Govt. Technical & Vocational Center (B), Ghazi w/r to his telephonic discussion on 11-05-2012.
2. Principal, Govt. Technical & Vocational Center (B), Tank.
3. Official concerned.

DEPUTY DIRECTOR (ADMN)

Office
order

*Attested
Jamil
Adveed*

OFFICE OF THE
PRINCIPAL GOVT:TECHNICAL & VOCATIONAL
CENTER (B) GHAZI.

D

12

Endst:No.GTVC/Estt:No.-----539-----

dated:-----16/5/2012-----

OFFICE ORDER..

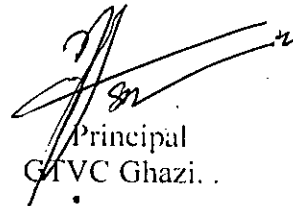
Consequent upon his Detail from GTVC GHAZI to GTVC Tank
Vide Director General order received under Endst:no.DGTE&MT/Estt/2856
(1-3) dated:11/5/2012 . Mr.ZAheer Ahmed (Shop Assistant) BPS-06 is here
by relived of from his duty today dated:16-5-2012.(A.f)

Principal.
GTVC Ghazi

Copy forwarded to:-

- 1-Director General TE&MT KPK Peshawar.
- 2-Principal GTVCGhazi (B) GTVC Tank.
- 3-Official concerned.
- 4-Office order file.

Attested
Jamil
Ahmed


Principal
GTVC Ghazi.

E 13

**OFFICE OF THE PRINCIPAL
GOVT: TECHNICAL & VOCATIONAL
CENTER (BOYS) TANK**

No.GTVC/B/TANK / _____

Dated: / 05 / 2012

To,

The Deputy Director (ADMN),
Technical Education & Manpower Training
Khyber Pakhtunkhwa Peshawar.

Subject: ARRIVAL REPORT.

Reference the Director General Technical Education & Manpower Training order No. DGTE&MT/Estt/2856 (1-3) Dated 11-05-2012.

Mr. Zaheer Ahmad Shop Assistant Govt: Technical & Vocational Centre (B) Ghazi has been detailed to this centre and reported for duty on today 17-05-2012. Accepted his arrival report and sent to your office for further necessary action.

YASEEN GUL KHATTAK
PRINCIPAL
GOVT: TECHNICAL & VOCATIONAL
CENTER (BOYS) TANK


No.GTVC/B/TANK / 96(1-3)

Dated: 12 / 05 / 2012

Copy for information:-

1. Principal Govt: Technical & Vocational Centre (B) Tank.
2. Official Concern.
3. Personal File.

A. H. Ahmad
Junaid
Advocate


YASEEN GUL KHATTAK
PRINCIPAL
GOVT: TECHNICAL & VOCATIONAL
CENTER (BOYS) TANK

F

14

خدمت جناب ڈائریکٹر جنرل ٹیکنیکل ایجوکیشن اینڈ ٹریننگ
ہونہ سرحد (پختون خواہ)

عنوان: ٹرانسفر - ڈیرہ اسماعیل خان

جناب صاحب

موجودہ گزارش ہے کہ خدوی شریہ دو سال سے گورنمنٹ

ٹیکنیکل اینڈ ووکیشنل سٹر غازی (ہری پور) میں ڈپٹی سراجنام
رہا ہے اور خدوی ضلع ڈیرہ اسماعیل خان کا رہنے والا ہے۔

خدوی کا والد ضعیف العمر اور خالج کا مر لیا ہے۔

لہذا خدوی کو ڈپٹی سراجنام دینے میں دستاویز پیش کر رہی ہیں
آپ صاحب سے ٹرانسفر کی درخواست کرتا ہوں۔

حسن گزارش ہوگی۔

حسنہ العالی

طاہر احمد ٹیکنیکل سٹاپ اسٹنٹ گورنمنٹ ٹیکنیکل اینڈ ووکیشنل سٹر غازی
(ہری پور)

Attested
Ginn 2
Advocate

S. M. K.

Makhdoom Zada
Syed Murtaza Kazim Shah
M.P.A
N.W.F.P

NAWAB ZADA MAHMOOD ZEB KHAN
Minister for Technical Education & Man Power
Training, Mines & Mineral & Development, NWFR.

REGISTERED ON
ACCOUNT NO. 2449

To

The Director General
Technical Education & Manpower Training
Khyber Pakhtunkhwa, Peshawar.

9 15

It's part of

Subject: TRANSFER BU

AGCA-2

13/2

R/Sir,

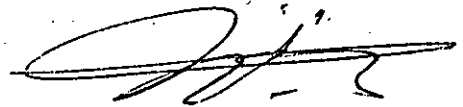
I feel honor to submit the following few lines for your sympatric consideration:

1. I am working as Workshop Assistant BPS-6 in Govt. Technical and Vocational Center (B) Ghazi.
2. That my stay at this station is about 6-years.
3. That I have 6- members family residing in native town.
4. That it is very difficult to spend the days in the present hard ship.
5. That my mother remains ill and there is no one to look after except me.

In the light of the above facts I request your honor to kindly transfer me at possible nearest station to DIKhan.

I will be thankful to you for this act of kindness in my favour.

*Attested
Jinnat
Ahmed*



ZAHEER AHMAD
Workshop Assistant
GTVC(B). Ghazi

خدمت جناب ڈائریکٹر جنرل سٹینٹل ایجوکیشن اینڈ سائنس یو۔ پی۔ اے۔

H

عنوان: درخواست برائے تصدیق جی ٹی وی سی غازی سے جی ٹی وی سی ٹانک

16

جناب عالی

موردبانہ گزارش ہے کہ سائل گزشتہ تین سال سے جی ٹی وی سی غازی میں بطور شاہد اعانتہ و ملازمت کر رہا ہے چونکہ سائل ڈیڑھ اعانتہ مان گا رہا ہے اور اتنا عرصہ سے اپنے علاقہ سے دور سفر میں ملازمت کر رہا ہے۔ اس لیے سائل کو یہاں پر بہت زیادہ گھریلو مسائل کی وجہ سے پریشانی کا سامنا ہے جس کی وجہ سے سائل کو مکمل ذہنی عدم آمیگی نہ ہونے کی وجہ سے ڈیوٹی کے دوران مختلف پریشانیوں اٹھانی پڑیں۔ ابا چونکہ جی ٹی وی سی ٹانک میں شاہد اعانتہ کی ایک پوسٹ خالی ہے۔ اس لیے آپ سے درخواست کی جا رہی ہے کہ سائل کو جی ٹی وی سی غازی سے جی ٹی وی سی ٹانک میں شاہد اعانتہ کی پوسٹ پر تعینات کیا جائے۔ تاکہ سائل کی پریشانیوں کا ازالہ ہو سکے اور ڈیوٹی کے دوران ایسی ذمہ داریوں کو احسن طریقے سے نبھایا سکے۔

درخواست کے ساتھ جی ٹی وی سی ٹانک میں حکمت و حکمت پوسٹ کی شاہد اعانتہ کی نقول منسلک جو کہ پوسٹ خالی جی ٹی وی سی ٹانک کی طرف سے تصدیق شدہ ہے۔

سائل آپ کے لیے نامزد کیا گیا ہے۔

19-01-2010

حرف

الحارحس

محمد

سائل ظہیر احمد وراجیل احمد شاہد اعانتہ جی ٹی وی سی (پورٹ غازی)

Attested
Jinnah
Advocates

J

GOVT: TECHNICAL & VOCATIONAL CENTRE (BOYS) TANK.
 STAFF STATEMENT ACCORDING OLD FOR THE MONTH OF December 2009.

SNO	NAME OF POST	GRADE	SANCTION OF POST		NAME OF ENCOMBENT	DATE OF TAKING	NAME OF VACANT.
01.	PRINCIPAL.	B. 18.	01.	B. 18.	SAIF -U-REHMAN.	06-02-2009.	
02.	LEACTURAR.	B. 17.	03.	B. 17.	HAROON-UR-RASHID.	21-08-2004.	
	---DO---	---DO---			SHAMSUL HAQ.	27-01-2003.	
	---DO---	---DO---			KHAN ZAMAN.	11-06-2008.	
3.	TRADE INSTRUCTOR.	B. 14.	07.	B. 14.	ABDUL KHALIQ.	07-09-2006.	
	---DO---	---DO---			ALI MUHAMMAD.	15-01-2008.	
	---DO---	---DO---			MUNIR AHAMAD.	20-07-2002.	
	---DO---	---DO---			ZAHOOR AHMAD	17-12-2005.	
	---DO---	---DO---			MUHAMMAD ALTAF.	20-07-2002.	
	---DO---	---DO---			MUHAMMAD HANIF.	06-06-2008.	
	---DO---	---DO---			SAIF-UR-REHMAN.	20-02-2009.	
4.	ASSISTANT.	B. 14.	01.	B. 14.	OBAID ULLAH.	07-08-2004.	
5.	JR. TRADE INSTRUCTOR.	B. 10.	03.	B. 10.	PETER SAMOUL.	07-04-2008.	
	---DO---	---DO---			MUHAMMAD ASLAM.	01-09-2009.	
	---DO---	---DO---			QAMAR JAVEED.	01-09-2009.	
6.	SENIOR CLERK.	B. 09.	01.	B. 09.	BAHDAR KHAN.	07-08-2004.	
7.	JUNIOR CLERK.	B. 07.	01.	B. 07.	GUL SARWAR.	02-06-2008.	
8.	SHOP ASSISTANT.	B. 06.	03.	B. 06.	RANA SALAH-U-DIN.	04-03-2008.	
	---DO---	---DO---			VACANT.		VACANT.
	---DO---	---DO---			GUL MUHAMMAD.	07-08-2004.	
9.	STORE KEEPER.	B. 06.	01.	B. 06.	SALIM ULLAH.	04-09-2006.	
10.	NAIB QASID.	B. 02.	04.	B. 02.	SAID BAD SHAH.	29-09-1996.	
	---DO---	---DO---			MUHAMMAD ASLAM.	20-01-2003.	
	---DO---	---DO---			DAWOOD KHAN.	23-06-1988.	
	---DO---	---DO---			FARID ULLAH.	01-04-1999.	
11.	SHOP ATTANDENT.	B. 02.	04.	B. 02.	AJAB KHAN.	01-10-1985.	
	---DO---	---DO---			SARWAR JAN.	21-09-1986.	
	---DO---	---DO---			MUHAMMAD AYAZ.	09-09-1986.	
	---DO---	---DO---			GHULAM AKHTAR.	10-10-1988.	
12.	STORE ATTANDENT.	B. 02.	01.	B. 02.	IZAT KHAN.	06-04-2005.	
13.	CHOWKEDAR.	B. 02.	04.	B. 02.	SAMNDAR KHAN.	03-02-2007.	
	---DO---	---DO---			AKBAR KHAN.	10-10-1998.	
	---DO---	---DO---			MUHAMMAD YOUNAS.	14-05-2004.	
	---DO---	B. 01.		B. 01.	SHAH NAWAZ.	10-05-2003.	
14.	MALI.	B. 02.	01.	B. 02.	UMAR HAYAT.	01-12-1985.	
15.	SWEEPER.	B. 02.	01.	B. 02.	QAMAR ZAMAN.	01-01-1990.	
	TOTAL.						

Attest
 Javed
 Advocate

1922222222

10/1/2010

گورنمنٹ ہسپتال - ڈائریکٹر ٹیکنیکل ایجوکیشن میٹروپولیٹن

Through proper channel

عنوان: درخواست برائے سفر

اران بخاری علی گڑھ

18

K

عنوان: علی

موصوفیہ گزارش ہے کہ پائل 2007ء سے بخاری علی گڑھ ہسپتال

میں بطور سٹیب اسٹنٹ تعینات ہے۔ حال ہی میں

سٹیب کو بخاری علی گڑھ ہسپتال میں تبدیل کیا گیا ہے

میں کی وجہ سے سٹیب کو مختلف مسائل از قلم و کلامی

معاہدہ بخارہ و دیگر درپیش ہیں۔ علاوہ ازیں حکومت

کی سرپرستی نوٹیفیکیشن کی SOR-VII/EDAD/1-4
2908/VOL-VII Date 11-09-2009

Attested
June 23
2009

بہر حال سٹیب برائے تعیناتی ایک سفارش پر 3 سہ ماہیہ

سہ ماہیہ کے 6 سال کا عرصہ ابھی بچتا ہے بخاری علی گڑھ ہسپتال

میں بخاری علی گڑھ ہسپتال کو منتقل ہونے کے بعد سٹیب بخاری علی گڑھ ہسپتال

میں منتقل کر کے کسی قسم کی گھبراہٹ یا کسی اور طرح کے مسائل سے

5/12/2012

(Signature)

طیبا محمد سٹیب اسٹنٹ اور دیگر ٹیکنیکل ایجوکیشن میٹروپولیٹن

کے تحت سے گزرتے ہوئے کھنڈوں کو
through ParoPer channel

عنوان: درخواست برائے ادائیگی عایدہ پنشن

ح

صہ عالی

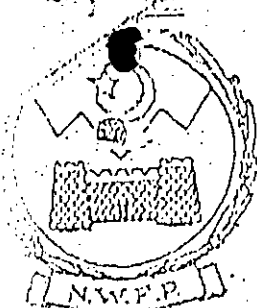
مذکورہ ہے کہ سائل کو از اوچ حکم نمبر 2856 (1-3) ع
تاریخ 11-5-2013ء کے تحت برائے سائل کی عایدہ پنشن کی رقم
میں سے سائل کو سزاوار عایدہ پنشن کی رقم کی سہولت
میں سے ملنے لگی ہے۔ لیکن سائل کو سزاوار عایدہ پنشن کی رقم
میں سے ملنے لگی ہے۔ لیکن سائل کو سزاوار عایدہ پنشن کی رقم

② یہ کہ اس کے لئے کو ماہ عینوں کی سزاوار عایدہ پنشن کی
رقم میں سے سائل کو سزاوار عایدہ پنشن کی رقم کی سہولت
میں سے ملنے لگی ہے۔ لیکن سائل کو سزاوار عایدہ پنشن کی رقم
میں سے ملنے لگی ہے۔ لیکن سائل کو سزاوار عایدہ پنشن کی رقم

تاریخ 04-02-2013

Attest
Advocate
[Signature]

طیبتاً و سہلاً
[Signature]



GOVERNMENT OF THE
ESTABLISHMENT & ADMINISTRATION
DEPARTMENT

(Regulation Wing)

No. SOR-VI(E&AD)-I-2008/Vol-VII
Dated Peshawar, the 11th September, 2009

M
A 20

1. The Additional Chief Secretary, Govt of NWFP P&D Department.
2. The Additional Chief Secretary (FATA), Peshawar.
3. The Additional Chief Secretary Home Department.
4. The Senior Member, Board of Revenue, NWFP.
5. All Administrative Secretaries to Government of NWFP.
6. The Secretary to Governor, NWFP.
7. The Principal Secretary to Chief Minister, NWFP.
8. All Divisional Commissioners in NWFP.
9. All DCOs in NWFP/Political Agent in FATA.

Subject: POSTING/TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT.

Dear Sir,

I am directed to refer to the subject and to convey that the competent authority has been pleased to amend Para-IV of the existing, posting/ transfer policy of the Provincial Government circulated vide letter No.SOR-VI(E&AD)/Misc/Updation/09 dated 13 January, 2009 as under.

Para IV: Existing tenure of posting/transfer of three (03) years for settled areas and two (02) years for unattractive /hard areas shall be reduced to two (02) years for settled areas, 01 1/2 years for unattractive areas and one year for hard areas.

2. The above amendment is hereby circulated for information/compliance.

3. Nonetheless the status quo of posting/transfer in FATA will be maintained.

Yours faithfully,
(Signature)
(KALEEM ULLAH)
SECTION OFFICER (REG-VI)

(Signature)
Advocate

(Signature)
Advocate

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GOVERNMENT OF NWFP
ESTABLISHMENT & ADMINISTRATION
DEPARTMENT
(Regulation Wing)

No.SOR-VI/E&AD/I-4/2008/Vol-VII
Dated Peshawar the 11th September, 2009

To,

1. The Additional Chief Secretary, Govt: of NWFP P&D Department.
2. The Additional Chief Secretary (FATA), Peshawar.
3. The Additional Chief Secretary Home Department.
4. The Senior Member, Board of Revenue, NWFP.
5. All Administrative Secretaries to Government of NWFP.
6. The Secretary to Government, NWFP.
7. The Principal Secretary to Chief Minister, NWFP.
8. All Divisional Commissioners in NWFP.
9. All DCOs in NWFP/Political Agent in FATA.

Subject: POSTING/TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT.

Dear Sir,

I am directing to refer to the subject and to convey that the competent authority has been pleased to amend Para-IV of the existing, posting/transfer policy of the Provincial Government circulated vide letter No. SOR-VI(E&AD)/Mis/Updation/09 dated 13 January, 2009 as under:

PARA IV: existing tenure of posting/transfer of three (03) years for settled areas and two (02) years for unattractive/hard areas shall be reduced to two (02) years for settled areas, 01 ½ years for unattractive areas and one year for hard areas.

2. The above amendment is hereby circulated for information/compliance.
3. Nonetheless the status quo of posting/transfer in FATA will be maintained.

Yours faithfully,

Attested
Junaid Adhwan

Sd: _____
(KALEEM ULLAH)
SECTION OFFICER (REG-VI)

وکالت نامہ

21

قیمتی ایک روپیہ		کورٹ فیس
--------------------	--	-------------

سروس ٹریڈنگ کمپنی لکھنؤ

منجانب / اسٹریٹ

نام حکومت / ظہیر احمد

دعویٰ یا جرم / سروس ٹریڈنگ

تفصیل دعویٰ یا جرم / باعث تحریر آگندہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بروہی و جواب دی براہ معاشی یا تعلقہ مقدمہ کے تمام جملہ شرائط و ضوابط کے تحت

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا بڑا بذریعہ رو برو عدالت حاضر ہوتا ہوں گا اور ہر وقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر منظر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام بکھری کے علاوہ یا بکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بروہی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر بکھری کے علاوہ اور جگہ باعث ہونے یا بروز تعطیل یا بکھری کے اوقات کے آگے یا پیچھے پیش ہونے پر منظر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا امتن نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے مجھ کو کل ساختہ پر داخست صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ یا درخواست اجراء اسمائے ذکری نظر ثانی اپیل گمرانی و ہرقم درخواست ہرقم کے بیان دینے اور پر ثالثی یا راضی نامہ و فیصلہ برطرف کرنے اقبال دعویٰ کا بھی اختیار ہو گا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مزکور بیرون از بکھری صدر بروہی مقدمہ مزکور نظر ثانی اپیل و گمرانی و برآمدگی مقدمہ یا منوشی ذکری یک طرفہ یا درخواست حکم اقامتی یا قرتی یا گرفتاری قبل از فیصلہ اجراء ذکری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ علیحدہ بروہی کا اختیار ہو گا اور تمام ساختہ پر داخست صاحب موصوف مثل کردہ از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو کہ مقدمہ مزکورہ یا اس کے کسی جزو کی کاروائی یا بصورت درخواست نظر ثانی اپیل گمرانی یا دیگر معاملہ و قدمہ مذکورہ کسی دوسرے وکیل یا ہیر سٹروک اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانب التواء پڑے گا وہ صاحب موصوف کا حق ہو گا مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پروہی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے
موری 16 ماہ 27 2013
مضمون وکالت نامہ من لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

(Signature)

ظہیر احمد / اسٹریٹ

Attested & Accepted
Jumra Akhwan
16/3/13