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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

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Ajmal Khan
RUSTAM KHAN VS EDUCATION DEPARTMENT

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Muharin
Muharin Compilation

24/5/24
Incharge Judicial Branch



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar.

No. 11523 / Legal

dated the 08 / 12 / 2021.

To: The Regional Police Officer,
Hazara.

Subject: REQUEST FOR JUSTICE

Memo: Please refer to your office Letter No. 27947/E, dated 29.11.2021, on the subject cited above.

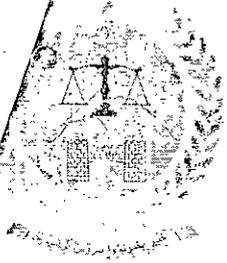
The perusal of record reveals that, since the establishment of FAR, renamed FRP, it has its own hierarchy in wake of seniority promotions in the junior rank, selection for course on the quota of seats of different courses to this organization allotted by the competent authority and seniority of promotions lists ABCDE were also maintained separately within the organization like Districts till the promulgation of Standing Order No. 02/2014.

If the applicants qualified promotions courses on their own turn with their colleagues and were promoted from one rank to another on the basis of seniority-cum-fitness in accordance with Police Rules 1934 and subsequently, were placed at the bottom of seniority list of the District of their Domicile according to their rank thus they do not come within the ambit of out of turn promotion.

According to judgment of Apex Court if someone promoted on the basis of any kind of incentive i.e gallantry, cadetship and special case by-passing his batch-mates colleagues thus it is declared out of turn promotions.

ATG/LEGAL
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
08.12.2021

(1)



**KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR**

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281
Fax:- 091-9213262

No. 12/6 /ST Dated 10/5 /2024

To

The District Education Officer,
(Male) Nowshera.

Subject

JUDGMENT IN SERVICE APPEAL NO. 65/2024 TITLED AJMAL KHAN - VERSUS- THE GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH SECRETARY EDUCATION CIVIL SECRETARIAT PESHAWAR AND OTHERS

Dear Sir,

I am directed to forward herewith a certified copy of order dated. 01.04.2024, passed by this Tribunal in the above mentioned service appeal for compliance.

Encl As above.

(AAMIR FAROOQ KHATTAK)
ASSISTANT REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL,
PESHAWAR.

(2)

Service Appeal No.65/2024 titled "Ajmal Khan versus Government of Khyber Pakhtunkhwa through Secretary Education, Civil Secretariat Peshawar & others", decided on 01.04.2024 by Division Bench comprising of Mr. Kalim Arshad Khan, Chairman, and Mrs. Rashida Bano, Member Judicial, Khyber Pakhtunkhwa Service Tribunal, Peshawar.

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

**BEFORE: KALIM ARSHAD KHAN ... CHAIRMAN
RASHIDA BANO ... MEMBER (Judicial)**

Service Appeal No.65/2024

Date of presentation of Appeal.....22.12.2023

Date of Hearing.....01.04.2024

Date of Decision.....01.04.2024

Ajmal Khan, PSHT BPS-15 Government Primary School No.2 Spin
Kana Kalan District Nowshera.....(*Appellant*)

Versus

1. **Government** of Khyber Pakhtunkhwa Peshawar through Secretary Education, Civil Secretariat Peshawar.
2. **Director of Education**, Peshawar.
3. **District Education Officer (M)**, Nowshera.
4. **ASDEO (M)** Circle Pabbi, District Nowshera.
5. **Fazli Malik** PSHT BPS-15 Government Primary School No.2 Taru Jabba, Tehsil Pabbi, District Nowshera.....(*Respondents*)

Present:

Mr. Meher Gul, Advocate.....For the appellant

Mr. Muhammad Jan, District AttorneyFor respondents

Mr. Fazli Malik.....Private respondent No.4 (In Person)

.....
APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED TRANSFER ORDER DATED 12.06.2023 OF RESPONDENT NO.3 VIDE WHICH RESPONDENT NO.3 DECLARED HIS EARLIER TRANSFER ORDER ENDSTT NO.4115 DATED 30.03.2023 AS NULL AND VOID WITHOUT ADVANCING ANY PLAUSIBLE AND LEGAL JUSTIFICATION AGAINST WHICH DEPARTMENTAL APPEAL WAS PREFERRED BUT UN-RESPOND WITHIN STIPULATED PERIOD OF TIME.



**SCANNED
KPST
Peshawar**

(3)

Service Appeal No.65/2024 titled "Ajmal Khan versus Government of Khyber Pakhtunkhwa through Secretary Education, Civil Secretariat Peshawar Peshawar & others", decided on 01.04.2024 by Division Bench comprising of Mr. Kalim Arshad Khan, Chairman, and Mrs. Rashida Bano, Member Judicial, Khyber Pakhtunkhwa Service Tribunal, Peshawar.

JUDGMENT

KALIM ARSHAD KHAN CHAIRMAN: Brief facts of the case, as enumerated in the memo and grounds of appeal are that appellant was serving as Primary School Head Teacher (PSHT) at Government Primary School No.2 at Spin Kana Kalan District Nowshera since 28.07.2015; that on 30.03.2023 the DEO (Male) Nowshera issued transfer order of the appellant to GPS No.2 Taru Jabba, Tehsil Pabbi, District Nowshera with direction that the appellant shall take over charge of the said post after the retirement of one Malik Hidayat Ullah PSHT (BPS-15); that vide impugned transfer order dated 12.06.2023, instead of appellant, private respondent No.4 was ordered to be posted at GPS No.2 Taru Jabba, Tehsil Pabbi, District Nowshera.

2. Feeling aggrieved of the impugned order dated 12.06.2023, the appellant filed departmental appeal, which was not responded, therefore, the appellant filed the instant service appeal.

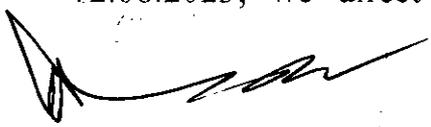
3. On receipt of the appeal and its admission to full hearing, the respondents were summoned. Respondents put appearance and contested the appeal by filing written reply raising therein numerous legal and factual objections. The defense setup was a total denial of the claim of the appellant.

4. We have heard learned counsel for the appellant and learned Deputy District Attorney for official respondents and private respondent No.4.

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5. The learned counsel for the appellant reiterated the facts and grounds detailed in the memo and grounds of the appeal while the learned District Attorney assisted by private respondent No.4 controverted the same by supporting the impugned order(s).

6. This appeal is against the order dated 12.06.2023, whereby, private respondent No.4 namely Fazli Malik PSHT (BPS-15) was transferred at GPS No.2 Taru Jabba, Tehsil Pabbi, District Nowshera. The order was though given immediate effect but in the note under it, it was mentioned that the same would be effective on retirement of one Malik Hidaytullah, within another line it was written that any other transfer order except the one dated 12.06.2023, would be considered as null and void. When confronted how the earlier order vide which the appellant was transferred to GPS No.2 Taru Jabba, that too was given immediate but with the same sentence that he would assume the charge on retirement of Malik Hidaytullah, would be declared null and void by the same authority, and especially, the subsequent order of 12.06.2023 was ambiguous, as if the DEO (Male) Nowshera was not knowing his earlier order, made by him. Be that as it may, there was no justification for issuance of second order when the earlier order was in the field and that was not cancelled or withdrawn. The private respondent No.4 present in the court, however, says that he was facing various problems because of which, he had requested for his posting at any nearby school. Therefore, while allowing this appeal and setting aside the impugned transfer order dated 12.06.2023; we direct the official respondents to accommodate the



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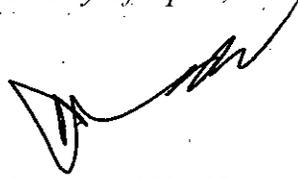
(5)

Service Appeal No.65/2024 titled "Ajmal Khan versus Government of Khyber Pakhtunkhwa through Secretary Education, Civil Secretariat Peshawar Peshawar & others", decided on 01.04.2024 by Division Bench comprising of Mr. Kalim Arshad Khan, Chairman, and Mrs. Rashida Bano Member Judicial, Khyber Pakhtunkhwa Service Tribunal, Peshawar

private respondent No.4 at school nearer to his abode. Order accordingly.

Costs shall follow the event.Consign.

7. *Pronounced in open Court at Peshawar and given under our hands and the seal of the Tribunal on this 1st day of April, 2024.*



KALIM ARSHAD KHAN

Chairman



RASHIDA BANO

Member (Judicial)

SCANNED
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PESHAWAR

Amazem Shah

(8)

S.A #.65/2024

ORDER

1st Apr. 2024

1. Learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney alongwith Mr. Irfan Ul Haq, Subject Specialist for official respondents No.1 to 3 present. Private respondent No.4 in person present.

2. Vide our detailed judgment of today placed on file, while allowing this appeal and setting aside the impugned transfer order dated 12.06.2023, we direct the official respondents to accommodate the private respondent No.4 at school nearer to his abode. Order accordingly. Costs shall follow the event. Consign.

3. *Pronounced in open Court at Peshawar and given under our hands and the seal of the Tribunal on this 1st day of April, 2024.*



(Rashida Bano)
Member (J)



(Kalim Arshad Khan)
Chairman

(7)

29.02.2024

1. Junior to counsel for the appellant present. Mr. Habib Anwar, Additional Advocate General for the respondents present.

2. Reply/comments on behalf of respondents submitted through office which are placed on file. Copy of the same handed over to junior of learned counsel for the appellant. To come up for arguments on 15.03.2024 before D.B. P.P given to the parties.

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Peshawar

(Muhammad Akbar Khan)
Member (E)

Kamranullah

15.03.2024 1. Learned counsel for the appellant. Mr. Asif Masood Ali Shah, Deputy District Attorney alongwith Ifran Ul Haq, ADO for the respondents present. Nemo for private respondent No. 5.

2. Although private respondent No. 5 was summoned on 07.02.2024 but record is silent about his presence, therefore, he be summoned through TCS the expenses of which be deposited by the appellant within two days. In the meanwhile, representative of respondent is directed to produce posting/transfer history of the appellant as well as of the private respondent No.5 on the next date. Adjourned. To come up for record and arguments on 01.04.2024 before the D.B. P.P given to the parties.

Tas Expenses
Not Submitted
20/3 Q
SCANNED
KPST
Peshawar

(Fareeha Paul)
Member (E)

(Rashida Bano)
Member (J)

Kaleemullah

(8)

07.02.2024

1. Junior to counsel for the appellant present. Mr. Asif Masood Ali Shah learned Deputy District Attorney alongwith Tufail, Assistant for the respondents present.

2. Written reply not submitted. Representative of respondent seeks time for submission of written reply. Adjourned. To come up for written reply/comments on 20.02.2024 before S.B. P.P given to the parties.


(Rashida Bano)
Member (J)

*KaleemUllah

20.02.2024

Learned counsel for the appellant present. Mr. Habib Anwar, Additional Advocate General for the respondents present and sought further time for submission of reply/comments. Adjourned. Last opportunity granted. To come up for reply/comments on 29.02.2024 before the S.B. Parcha Peshi given to the parties.


(Salah-ud-Din)
Member (J)

Naeem Amin

SCANNED
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Peshawar

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Peshawar

24.01.2024

Learned counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant contended that the appellant while serving as PSHT (BPS-15) in GPS No. 2 Spin Kani Kalan was transferred to GPS No. 2 Faru Jabba Pabbi Nowshera vide order dated 30.03.2023 in his own grade and pay with the direction to take over the charge after the retirement of Malik Hidayat Ullah PSHT, however vide the impugned order dated 12.06.2023 private respondent No. 5 Fazli Malik PSHT (BPS-15) was transferred to GPS No. 2 Taru Jabba Pabbi Nowshera. He next contended that posting/transfer are made in exigency of service or in the interest of public, however the order dated 12.06.2023 was result of political intervention just to accommodate of private respondent No. 5. He also argued that the impugned Notification dated 19.05.2023 is wrong and illegal, therefore, not tenable in the eye of law and is liable to be struck down. The appellant filed departmental appeal, however the same was not responded within the statutory period of 90 days, hence the instant appeal.

Points raised need consideration, hence the appeal in hand is admitted to regular hearing subject to all legal and valid objections including the question of limitation. The appellant is directed to deposit security fee within 10 days. Respondents be summoned through TCS, the expenses of which be deposited by the appellant within three days. To come up for submission of written reply/comments on 07.02.2024 before the S.B. Parcha Peshi given to the parties.

Alongwith memorandum of appeal, the appellant has also filed an application for suspension of operation of impugned order dated 12.06.2023 and restoration of earlier order dated 30.03.2023 till final decision of the instant appeal. Notice of the same also be issued to the respondents for the date fixed.

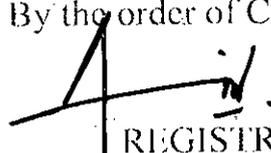
(Salahud-Din)
Member (J)

(10)

FORM OF ORDER SHEET

Court of _____

Appeal No. 65/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	03/01/2024	<p>The appeal of Mr. Ajmal Khan resubmitted today by Mr. Meher Gul Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>09-01-24</u>. Parcha Peshi is given to counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p> <p>Appellant in person present and requested for adjournment on the ground that his counsel is unable to appear before the Tribunal today due to strike of lawyers. Adjourned. To come up for preliminary hearing on 24.01.2024 before the S.B. Parcha Peshi given to the appellant.</p> <p> (Salah-ud-Din) Member (J)</p>

SCANNED
KPST
Peshawar

09.01.2024

Naeem Amin

SCANNED
KPST
Peshawar

(11)

The appeal of Mr. Ajmal Khan received today i.e. on 22.12.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Memorandum of appeal is not signed by the appellant.
- 4- Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. L /S.T.

DL 1-1 /2024

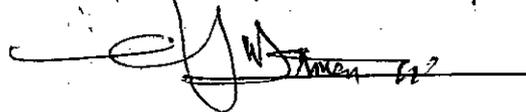


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Meher Gul Adv.
High Court, Peshawar.

- 1 - check list attached.
- 2 - Appeal is flagged with annexures marks.
- 3 - Memorandum of appeal is signed by the Counsel of Appellant; as well as Affidavit on the Appeal (Grounds of Appeal) is duly signed by the Appellant.
- 4 - Two more copies/sets of the appeal along with annexures submitted.

Resubmitted after completion.



DT- 02 / 01 / 2024

(MEHER GUL)

Advocate

(12)

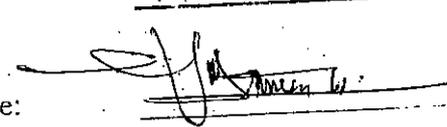
BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST

Case Title: AJMAL KHAN vs GOVT OF KPK & Others

S.#	Contents	Yes	No
1.	This appeal has been presented by: <u>MEHER GUL Advocate</u>	<input checked="" type="checkbox"/>	
2.	Whether Counsel / Appellant / Respondent / Deponent have signed the requisite documents?	<input checked="" type="checkbox"/>	
3.	Whether Appeal is within time?	<input checked="" type="checkbox"/>	
4.	Whether the enactment under which the appeal is filed mentioned?	<input checked="" type="checkbox"/>	
5.	Whether the enactment under which the appeal is filed is correct?	<input checked="" type="checkbox"/>	
6.	Whether affidavit is appended?	<input checked="" type="checkbox"/>	
7.	Whether affidavit is duly attested by competent oath commissioner?	<input checked="" type="checkbox"/>	
8.	Whether appeal/annexures are properly paged?	<input checked="" type="checkbox"/>	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	<input checked="" type="checkbox"/>	
10.	Whether annexures are legible?	<input checked="" type="checkbox"/>	
11.	Whether annexures are attested?	<input checked="" type="checkbox"/>	
12.	Whether copies of annexures are readable/clear?	<input checked="" type="checkbox"/>	
13.	Whether copy of appeal is delivered to A.G/D.A.G?	<input checked="" type="checkbox"/>	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	<input checked="" type="checkbox"/>	
15.	Whether numbers of referred cases given are correct?		<input checked="" type="checkbox"/>
16.	Whether appeal contains cuttings/overwriting?		
17.	Whether list of books has been provided at the end of the appeal?	<input checked="" type="checkbox"/>	
18.	Whether case relate to this Court?	<input checked="" type="checkbox"/>	
19.	Whether requisite number of spare copies attached?	<input checked="" type="checkbox"/>	
20.	Whether complete spare copy is filed in separate file cover?	<input checked="" type="checkbox"/>	
21.	Whether addresses of parties given are complete?	<input checked="" type="checkbox"/>	
22.	Whether index filed?	<input checked="" type="checkbox"/>	
23.	Whether index is correct?	<input checked="" type="checkbox"/>	
24.	Whether Security and Process Fee deposited? on		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? on		
26.	Whether copies of comments/reply/rejoinder submitted? on		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? on		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: MEHER GUL

Signature: 

Dated: 02-1-2024

Appeal

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

Service Appeal No. 65 /2023.

SCANNED
KPST
Peshawar

Ajmal Khan PSHT PBS-15 Govt Primary School No.2 SPIN KANA KALAN
District Nowshera.

.....Appellant.

Versus

Government of Khyber Pakhtunkhwa through Secretary Education & Others

.....Respondents

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Sno	Description of Documents	Annexure	Pages
1	Service Appeal with Affidavit	-	1-4
2	Stay Application with Affidavit	-	5-6
3	Addresses of the parties	-	07
4	Copy of Transfer Order dated 30-3-2023	A	08
5	Copy of impugned Order dated 12-6-2023	B	09
6	Copy of charge Certificate/charge Report dated 20-9-2023	C	10
7	Copy of Departmental Appeal dated 25-9-2023	D	11
8	Wakalat Nama	-	12


Appellant

Through



MEHER GUL

Advocate High Court, Peshawar

Cell No. 0306-2981781

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①

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. 65 /2023.

Diary No. 10052

Dated 22-12-2023

Ajmal Khan PSHT PBS-15 Govt Primary School No.2 SPIN KANA KALAN District
Nowshera.

.....Appellant.

Versus

1. Government of Khyber Pakhtunkhwa through Secretary Education Civil Secretariat, Peshawar.
2. Director of Education, Peshawar.
3. District Education Officer (M), Nowshera.
4. ASDEO(M) Circle Pabbi ,District Nowshera
5. Fazli Malik PSHT BPS-15 Govt Primary School No.2 Taru Jabba, Tehsil: pabbi District Nowshera

.....Respondents.

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED
TRANSFER ORDER DATED 12-6-2023 OF RESPONDENT NO.3
VIDE WHICH RESPONDENT NO.3 DECLARED HIS EARLIER
TRANSFER ORDER ENDSTT NO.4115 DATED 30-3-2023 AS
NULL AND VOID WITHOUT ADVANCING ANY PLAUSIBLE AND
LEGAL JUSTIFICATION AGAINST WHICH DEPARTMENTAL
APPEAL WAS PREFERRED BUT UN- RESPONDED WITHIN
STIPULATED PERIOD OF TIME.

~~Medhatay~~
~~22/12/23~~
REGISTRAR
22/12/23

(15)

(2)

Prayer:

On acceptance of this appeal the impugned Transfer Order dated 12-6-2023 of Respondent No.3 may very graciously be withdrawn/set aside being unlawful and without lawful authority, where as his earlier Transfer Order dated 30-3-2023 with respect to the transfer of appellant be restored and Respondents be further directed to issue charge certificate/charge Report to the appellant forthwith.

Respectfully sheweth;

The appellant humbly submits as under;

1. That the appellant is performing duty in Government Primary School No.2 at Spin Kana Kalan District Nowshera since 28-7-2015 continuously for almost 08 years.
2. That on 30-3-2023 Respondent No.3 was pleased to issue Transfer Order of appellant with direction that appellant will take over charge after the retirement of Mr Malik Hidayatullah PSHT BPS-15 of Government Primary School No.2 Taru Jabba, Tehsil pabbi, District Nowshera.

(copy of transfer Order dated 30-3-2023 of the Appellant is Annexure "A")

3. That few days ago on the retirement of the above stated official, the Appellant came to know about the impugned Order dated 12-6-2023 of Respondent No.3 and the charge certificate/charge report No.1238 dated 20-9-2023 issued to Respondent No.5.

(copy of impugned transfer Order dated 12-6-2023 and charge report dated 20-9- 2023 is Annexure "B" & "C").

4. That the appellant being aggrieved from the transfer Order dated 12-6-2023 of Respondent No.3 filed departmental appeal before Respondent No.2 vide Diary No.801 dated 25-9-2023, but the same has not been responded within stipulated period of time.

(copy of Departmental Appeal is Annexure "D")

5. That the appellant being aggrieved of the impugned Order dated 12-6-2023 and action and none-action of Respondent No.2 assailed the same in this appeal on the following amongst other grounds.

Grounds:

- A. That the act and omission of Respondent No.2 and the impugned Transfer Order dated 12-6-2023 of Respondent No.3 is patently illegal, unlawful, without lawful authority, hence liable to be set aside / withdrawn.
- B. That the appellant performing duty at Government Primary School No.2 Spin Kana Kalan for almost 08 years, so in this scenario declaring earlier Transfer Order dated 30-3-2023 null and void with respect to the transfer of appellant is against the law and norms of natural justice which is liable to rectification by this Honorable Tribunal .
- C. That passing the impugned Order dated 16-6-2023 and accommodating respondent No.5, and declaring the earlier transfer Order dated 30-3-2023 with respect to the transfer of appellant as null and void depict the arbitrary use of the authority on the part of respondent No.3, which prompt the indulgence of this honorable Tribunal.
- D. That the appellant is serving the department with his full devotion and to the entire satisfaction of his superior in Government primary School No.2 at SPIN KANA KALAN, for almost 08 years, but on the other hand the appellant was treated in a manner not warranted under the law and norms of natural justice.
- E. That declaring its earlier order null and void without advancing any legal justification for it, is clear cut manifestation of abuse of power and colorful exercise of authority on the part of Respondents which this honorable tribunal may interfere with.
- F. That Respondent No.2 was duty bound under the law to decide the departmental appeal of the appellant but he badly failed to do so,

(17)

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which act of the Respondent is illegal under the law, hence has no legal footing to stand upon.

G. That other grounds will the appellant may urge at the time of arguments with permission of this honorable Tribunal.

It is therefore, humbly prayed that on acceptance of this appeal the act and omission of Respondent No.2 and the impugned transfer Order dated 16-6-2023 of Respondent No.3 be set aside/withdrawn and Earlier transfer Order dated 30-3-2023 of Respondent No.3 with respect to the transfer of appellant be restored and Respondents be further directed to issue charge certificate/charge report to the Appellant forthwith in the interest of justice.

Any other relief deemed fit in the circumstances of the case may also be granted to appellant.

ALM Gul

Appellant

Through *[Signature]*

MEHER GUL

Advocate High Court

AFFIDAVIT

I, Ajmal khan PSHT PBS-15 Government Primary School No.2 SPIN KANA KALAN District Nowshera do hereby affirm and declare on oath that contents of instant Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon,ble Tribunal.

[Signature]
ATTESTED

[Signature]

Deponent



22-12-2023

(18) (5)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2023.

Ajmal khan PSHT PBS-15 Govt Primary School No.2 SPIN KANA KALAN District
Nowshera.

.....Appellant.

Versus

Government of Khyber Pakhtunkhwa through Secretary Education & Others

.....Respondents

APPLICATION FOR SUSPENSION OF OPERATION OF IMPUGNED
ORDER DATED 12-6-2023 AND RESTORATION OF EARLIER
ORDER DATED 30-3-2023 AND ISSUANCE OF CHARGE
CERTIFICATE/CHARGE REPORT TO APPELLANT FORTHWITH
TILL FINAL DECISION OF THE TITLED APPEAL.

Respectfully sheweth:

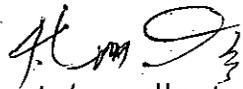
The applicant/appellant submits as under;

1. That the above titled appeal is being filed before this hon'ble Tribunal along with instant application.
2. That the grounds of main appeal may kindly also be considered as part and parcel of this application.
3. That the applicant has good prima-facie case in his favor and is also sanguine about its success.
4. That the balance of convenience also lies in favor of appellant.

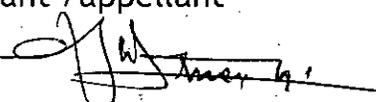
(19) 6

5. That if the relief as prayed for is not granted the applicant may apprehend irreparable loss, hence this application.

It is, therefore, humbly prayed that on acceptance of this application, the interim relief as prayed for in the heading of this application may graciously be granted till final decision of the instant appeal.


Applicant / appellant

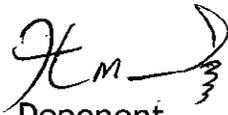
Through


MEHER GUL

Advocate High Court

AFFIDAVIT

I, Ajmal Khan PSHT PBS-15 Government Primary School No.2 SPIN KANA KALAN District Nowshera do hereby affirm and declare on oath that contents of instant Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon,ble Tribunal.


Deponent


ATTESTED



22-12-2023

(20)

7

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2023.

Ajmal khan PSHT PBS-15 Govt Primary School No.2 SPIN KANA KALAN District
Nowshera.

.....Appellant.

Versus

Government of Khyber Pakhtunkhwa through Secretary Education & Others

.....Respondents

ADDRESSES OF THE PARTIES APPELLANT:

Ajmal khan PSHT PBS-15 Government Primary School No.2 SPIN KANA
KALAN District Nowshera.

RESPONDENTS:

1. Government of Khyber Pakhtunkhwa through Secretary Education
Civil Secretariat, Peshawar.
2. Director of Education, Peshawar.
3. District Education Officer (M), Nowshera.
4. ASDEO(M) Circle Pabbi ,District Nowshera
5. Fazli Malik PSHT BPS-15 Government Primary School No.2 Taru
Jabba, Tehsil: pabbi District Nowshera

Appellant

Through



Meher Gul

Advocate High Court, Peshawar.

(21)

Annex A



OFFICE OF THE DISTRICT EDUCATION
OFFICER(MALE) NOWSHERA

(Office Phone#0923-9220228, Fax#0923-9220228)

OFFICE ORDER.

The Competent authority is pleased to adjust/Transfer Mr. Ajmal Khan PSHT BPS-15 GPS No; 2 Spin Kani Kalan To GPS No; 2 Taru Jabba Pabli Nowshera on his own grade and pay in the interest of public service with immediate effect.

- Note: -
- No TA/DA is allowed.
 - Charge report should be submitted to all concerned.
 - The official will take over charge after the retirement of Mr. Malik Hidayat Ullah PSHT of the above school

(SHAH JERAN)

DISTRICT EDUCATION OFFICER (M),
NOWSHERA

Endstt: No 4115-18 /DEO (M) NSR/Estab: Branch/Transfer/ Chowk(M) dated: 30/03/2023

Copy forwarded for information to the:-

- 1:- Sub: Divisional Education Officer (M) Concerned:
- 2:- District Monitoring Officer Nowshera.
- 3:- District Account Officer Nowshera.
- 4:- ASDEO (M) Circle Concerned
- 5:- Official Concerned.

DISTRICT EDUCATION OFFICER (M)
NOWSHERA

ATE

(22)

9

Annex B 2



OFFICE OF THE DISTRICT EDUCATION
OFFICER(MALE) NOWSHERA

(Office Phone: 011-23-9220228, Fax: 011-23-9220228)

OFFICE ORDER.

The Competent authority is pleased to adjust/Transfer Mr. Jami Malik PSMT BPS-15
GPS No: 1 Pitan Payan Tehsil Jhangra To GPS No: 2 Tara Jabba Pabli Nowshera on his own grade
and pay in the interest of public service with immediate effect.

- Note: -
- No TA/DA is allowed.
 - Charge report should be submitted to all concerned.
 - The official will take over charge after the retirement of Mr. Midayat Ur Rehman PSMT of the
above School.
 - Any other transfer order except this will be consider as null and void

(SHAH JEHAN)

DISTRICT EDUCATION OFFICER (M)
NOWSHERA

End: No 7728-32 /DEO (M) NSR/Estab: Branch/Transfer/ Chawk (M) dated: 12/08/2023

Copy forwarded for information to the:-

- 1:- Sub: Divisional Education Officer (M) Concerned.
- 2:- District Monitoring Officer Nowshera.
- 3:- District Account Officer Nowshera.
- 4:- ASDEO (M) Circle Concerned
- 5:- Official Concerned.

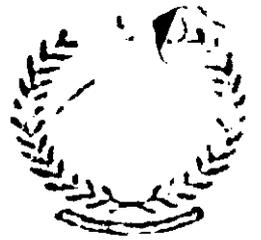
Handwritten signature and stamp on the left side of the page.

DISTRICT EDUCATION OFFICER (M)
NOWSHERA

Handwritten initials "Ate" and a signature mark.

OFFICE OF THE DISTRICT EDUCATION
 OFFICER (M) NOWSHERA

...



OFFICE ORDER

The Component authority is pleased to advise that Mr. ... will ...
 and pay in the interest of public service with immediate effect.

No TA/DA is allowed.

Original record should be submitted to all concerned.

The Officer will take over charge after the retirement of Mr. ... of the
 above school.

Any other transfer order received will be considered as void and void.

(SHAH JEHAN)

DISTRICT EDUCATION OFFICER (M)

NOWSHERA

Copy forwarded for information to:-
 Director (M) NERT (M) District (M) Nowshera (M) dated 1/10/2022

- 1 - Sub District Education Officer (M) Concerned
- 2 - District Monitoring Officer Nowshera
- 3 - District Account Officer Nowshera
- 4 - ASCO (M) Circle Concerned
- 5 - Official Concerned

DISTRICT EDUCATION OFFICER (M)

NOWSHERA



(23)

(16)

Anna C.S.

OFFICE OF THE
ASSISTANT SUB-DIVISIONAL EDUCATION OFFICER
CIRCLE PABBI TEHSIL, PABBI DISTRICT NOWSHAD

No: 1238-40

Dated: 20/09/2023

CHARGE CERTIFICATE

Mr. FAZLI MALIK (PSHT) s/o. MUHAMMAD AMIR KHAN yc
transferred vide DEO (M) NSR Endstt: No: 7728-32 dated 12/06/2023 from
Payan Tehsil Jehangira to GPS No 2 Taru Jabba Tehsil Pabbi.

Hence the charge is handed over to you today dated 20-09-2023 etc.

ATC

AA

AA

ASDEO (M) Circle
Assistant
Education
Officer

(25)

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal NO. 65/2024

Ajmal Khan

VS

Government of Khyber Pakhtunkhwa through Secretary E&SE & Others

INDEX

S.No	Documents	Annexure	Page No
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2.	Affidavit	_____	04
3.	Authority letter	_____	05
4	Copy of Application	A	6
5	Copy of transfer order of respondent no.5	B	7
6	Copy of relieving certificate of respondent no.5	C	8
7	Copy of charge report of respondent no.5	D	9
8	Copy of attendance certificate of respondent no.5	E	10
9	Copy of pay slip of respondent no.5	F	11

(Next date
29/2/24)

29. 02.2024

Ajmal Khan
District Education Officer
Dependent
(Male) Nowshera

(25)

①

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal NO. 65/2024

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 11468

Dated 29/2/24

Ajmal Khan

VS

Government of Khyber Pakhtunkhwa through Secretary E&SE & Others

Para wise Comments On Behalf Of Respondents no.1 to 4;

Respectfully Sheweth:

Respondents humbly submit as under.

Preliminary objections:

- 1) That the appellant was given conditional transfer order however it was cancelled in favor of the private respondent upon receiving of his objection over it, as he was serving in a very farther station then the appellant and the present school falls within his adjacent UC, so due to his valid justification and stance he was transferred upon the said school.
- 2) That the instant appeal is not maintainable in its present form.
- 3) That the appellant is concealing material facts from this Hon,ble court.
- 4) That the appeal is barred by law and limitation.

REPLY ON FACTS:-

- 1) Para -01 pertains to record.
- 2) Para -02 is correct as the said seat was going to be vacant upon the retirement of PSHT on dated 20-09-2023 while the appellant was given conditional transfer order on dated 30-03-2-23 to take effect after the retirement of the said PSHT. However an objection application

the retirement of the said PSH. However, an objection application given conditional transfer order on dated 30-03-2023 to take effect after retirement of PSH on dated 30-09-2023 while the appellant was

2) Para -02 is correct as the said was going to be vacant upon the

1) Para -01 remains to record.

BEYOND FACTS:-

- 1) That the appeal is barred by law and limitation
 - 2) That the appeal is concerning material facts from this Hon'ble
 - 3) That the instant appeal is not maintainable in its present form
- school
- to his valid justification and since he was transferred upon the said appellant and the present school falls within his adjacent DC, so due objection over it as he was serving in a very higher station then the was cancelled in favor of the private respondent upon receiving of his
- 1) That the appellant was given conditional transfer order however it

PRELIMINARY OBJECTIONS:

Respondent himself admit as under:

Respectfully Sheweth:

Para Wise Comments On Behalf Of Respondents No.1 to 4:

GOVERNMENT OF KERALA PAKHILAKHAMA THROUGH SECRETARY, ESTE & OFFERS

A2

എന്നി ക്ലസ്സ്

Service Appeal No. 892024

പ്രബന്ധം

BEFORE THE KERALA PAKHILAKHAMA SERVICE TRIBUNAL

(27)

(2)

was submitted by the private respondent no. 5, in which he objected the conditional transfer order of the appellant with justifiable grounds that he is serving in a very farther station i.e. about 50km away from home then the appellant working about 20km away from home similarly the said school falls in his adjacent UC about 3km while the appellant is residing about 8km away from the said school, similarly he also stated about his serious health issues, so the application was accepted and the private respondent no.5 was transferred to the said school, now he has taken charge upon the post of PSHT at GPS No.2 Tarujabba on dated 20-9-2023 and performing his duties regularly till date.(Copies of Application, transfer order, relieving certificate, charge report, attendance certificate and pay slip are annexed as A,B,C,D,E and F)

- 3) Para -03 is correct as explained in para 2.
- 4) Para-04 incorrect as explained in para 2.
- 5) Para-05 is incorrect appellant is not an aggrieved person having no cause of action to file the instant service appeal.

REPLY ON GROUNDS:

- A) Ground -A is incorrect. As the impugned transfer order issued by respondent no.3 is justified, based on sound and reasonable grounds thus no violation to the law, rules or policy has been made.
- B). Ground -B is incorrect as performance of duty in a station where services of an employee is needed is the part of terms and condition of service however as stated above the conditional transfer order issued to appellant was cancelled as the private respondent no.5 was having stronger and justifiable position as he was working in a more farther

- stronger and legitimate position as he was working in a more remote
 to appellant was cancelled as the private respondent now was paying
 services however as stated above the conditional transfer order issued
 services of an employee is needed is the part of terms and condition of
- B) Ground -B is incorrect as performance of duty in a station where
 this no violation to the rule, rule or policy has been made
 respondent now is justified, based on sound and reasonable grounds
- A) Ground -A is incorrect. As the impugned transfer order issued by

REPLY ON GROUNDS:

- action to file the instant service appeal
- 2) Para-02 is incorrect appellant is not an aggrieved person having no cause of
 4) Para-04 incorrect as explained in para 3
 3) Para -03 is correct as explained in para 3
- report attendance certificate and pay slip are annexed as A/B/C/D/E and F)
 date (Copies of Application, transfer order, relieving certificate, charge
 transfers on dated 20-8-2022) and performing his duties regularly till
 school, now he has taken charge upon the post of PSPP at CBS No. 2
 accepted and the private respondent now was transferred to the said
 he also stated about his serious health issues, so the application was
 appellant is residing about 8km away from the said school, similarly
 similarly the said school falls in his adjacent UC about 3km while the
 home then the appellant working about 20km away from home
 that he is getting in a very farther station he about 20km away from
 the conditional transfer order of the appellant with justifiable grounds
 was submitted by the private respondent no. 2, in which he objected

station and the said school is situated in his adjacent UC, thus his objection application was accepted and he was transferred to the said school.

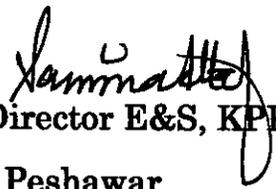
- C) Ground -C is incorrect, as explained above.
- D) Ground -D is incorrect as explained above.
- E) Ground -E is incorrect, as the objection raised by the respondent no.5 in his application against the conditional order of the appellant was more valid and justifiable so his application was accepted he was transferred and the earlier conditional order was cancelled.
- F) Ground -F is incorrect as explained above.
- G) Respondent may also be allowed to raise other grounds at the time of arguments.

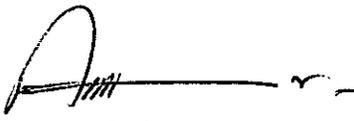
It is therefore most humbly prayed that the instant appeal being vexatious, erroneous and meritless may kindly be dismissed.

RESPONDANTS:

~~1. The District Education Officer (M)
Nowshera
(SHAH JEHAN)~~

3. The District Education Officer (M)
Nowshera
(SHAH JEHAN)


2. The Director E&S, KPK,
Peshawar
(Samina Altaf)


4. The ASDEO (M), Pabbi
Nowshera
(Akhtar Muhammad)

3. THE DISTRICT EDUCATION OFFICER (M)

4. THE ASSTO (M) BARBI

1. THE SECRETARY E&S' KPK

2. THE DIRECTOR E&S' KPK

RESPONDENTS:

objections, errors and mistakes may kindly be dismissed.
It is therefore most humbly prayed that the instant appeal being
unsuccessful.

- C) Respondent may also be allowed to raise other grounds at the time of
- B) Ground - E is incorrect as explained above.
- transferred and the earlier conditional order was cancelled.
- more valid and justifiable so his application was accepted he was
- in his application against the conditional order of the appellant was
- E) Ground - E is incorrect, as the objection raised by the respondent may
- D) Ground - D is incorrect as explained above.
- C) Ground - C is incorrect as explained above.

school.
objection application was accepted and he was transferred to the said
station and the said school is situated in his adjacent UC, thus his

(29)

(4)

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal NO. 65/2024

Ajmal Khan

VS

Government of Khyber Pakhtunkhwa through Secretary E&SE & Others

AFFIDAVITE

I, Shah Jehan District Education Officer (Male), Nowshera, do solemnly affirm and declare on oath that the contents of Par wise comments on behalf of respondents are true and correct to the best of my knowledge and nothing has been concealed from this Honourable Tribunal. It is

further stated on oath that in this appeal, Respondents have neither been placed Ex-parte nor their defense has been struck-off.

DEPONENT

[Signature]
District Education Officer
(Male) Nowshera



20 FEB 2024

(30)

(5)

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal NO. 65/2024

Ajmal Khan

VS

Government of Khyber Pakhtunkhwa through Secretary E&SE & Others

Authority Letter

I, Shah Jehan, District Education Officer (M), Nowshera, do hereby authorise Irfan ul Haq Litigation Officer BPS-17, Office of The District Education Officer (M) Nowshera, in the above mentioned service appeal to represent the undersigned Before The Khyber Pakhtunkhwa Service Tribunal Peshawar

District Education Officer (M)

**Nowshera, Education Officer
District
(Male) Nowshera**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal NO. 62/2024

Ajmal Khan

vs

Government of Khyber Pakhtunkhwa through Secretary E&S & Others

Authority Letter

I, Shah Jehan, District Education Officer (M), Nowshera, do hereby authorize Mr. Iqbal Haq, District Litigation Officer BP-17, Office of The District Education Officer (M) Nowshera, in the above mentioned service appeal to represent the undersigned before the Khyber Pakhtunkhwa Service Tribunal Peshawar.

District Education Officer (M)

Nowshera

خدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحب (میل) نوشہرہ
(درخواست برخلاف مشروط ٹرانسفر آرڈر بحق اجمل خان ہیڈ ماسٹر No. 2 GPS، سپین کانی کلاں نوشہرہ)

جناب عالی!

گزارش کی جاتی ہے کہ من سائل موضع علی بیگ نوشہرہ کارہائش ہوں۔ اور سنہ 2019ء سے GPS No. 1 پتیاؤں پایاں جہانگیرہ نوشہرہ میں اپنے گھر سے تقریباً 55/60 کلومیٹر دور بطور PSHT اپنے فرائض سرانجام دے رہا ہوں۔ میں کئی سالوں سے اس امید پر یہاں ڈیوٹی انجام دے رہا ہوں کہ میرے گھر کے قریب میں آسامی خالی ہونے پر مجھے نزدیک ٹرانسفر کر دیا جائیگا۔ لیکن مجھے یہ جان کر انتہائی دکھ اور افسوس ہوا کہ میرے گاؤں کے ساتھ متصل گاؤں میں PSHT کی آسامی جو کہ ستمبر میں خالی ہونے جارہی ہے۔ اس پر آپ نے پہلے ہی سے ایک مشروط ٹرانسفر آرڈر کے تحت مستی اجمل خان ہیڈ ماسٹر سپین کانی کلاں کا حکم جاری کیا ہوا ہے۔ جناب عالی! یہ میرے ساتھ سراسر ظلم اور ناانصافی ہے کیونکہ مذکورہ سکول میرے Adjacent UC میں میرے بالکل قریب واقع ہے ایسے اس پر باہر سے دوسرے بندے کے مقابلے میں، میں زیادہ حقدار ہوں۔ اسی طرح میرا موجودہ ڈیوٹی سٹیشن بھی مستی اجمل خان جو کہ اپنے گھر سے تقریباً 20km دور تعینات ہے۔ اس کے مقابلے میں تقریباً 50km دور دگنے فاصلے پر ڈیوٹی سرانجام دے رہا ہوں۔ مزید یہ کہ میں دل کے عارضے میں مبتلا ہوں اور مجھے ڈاکٹروں نے دل کا آپریشن کرنے کی تجویز دی ہے۔ لہذا میں طبی طور پر بھی مزید اتنی دور ڈیوٹی انجام دینے سے قاصر ہوں۔ لہذا انصاف کا تقاضا یہ ہے کہ مجھے محروم نہ رکھا جائے اور میرے ٹرانسفر کے احکامات صادر فرما دیئے جائے۔

لہذا میں آپ کے حضور استدعا کرتا ہوں کہ مندرجہ بالا حقائق کی روشنی میں انصاف کے تقاضوں کو مدنظر رکھتے ہوئے میرے تعیناتی کے احکامات صادر فرکر مشکور فرمائیں۔

المرقم 23/06/2023ء

العارض

درخواست گزار، فضل مالک ہیڈ ماسٹر No. 1 GPS پتیاؤں پایاں

نوشہرہ

DRD Diary No. 23
3-6-2023

District Education Officer
(Male) Nowshera

(32)

(7)

'B'



OFFICE OF THE DISTRICT EDUCATION OFFICER(MALE) NOWSHERA

(Office Phone#0923-9220228, Fax#0923-9220228)

OFFICE ORDER.

The Competent authority is pleased to adjust/Transfer Mr,Fazli Malik PSHT BPS-15 GPS No; 1 Pitaw Payan Tehsil Jehangira To GPS No;2 Taru Jabba Pabbi Nowshera on his own grade and pay in the interest of public service with immediate effect.

Note: - No TA/DA is allowed.
Charge report should be submitted to all concerned.
The official will take over charge after the retirement of Mr, Hidayat Ur Rehman PSHT of the above School.
Any other transfer order except this will be consider as null and void

(SHAH JEHAN)

DISTRICT EDUCATION OFFICER (M)
NOWSHERA

Endstt: No 7728-32 /DEO (M) NSR/Estab: Branch/Transfer/ Chowk(IV) dated: 12/06/2023

Copy forwarded for information to the:-

- 1:- Sub: Divisional Education Officer (M) Concerned.
- 2:- District Monitoring Officer Nowshera.
- 3:- District Account Officer Nowshera.
- 4:- ASDEO (M) Circle Concerned
- 5:- Official Concerned.

as

DISTRICT EDUCATION OFFICER (M)
NOWSHERA

District Education Officer (M)
Nowshera

For District Education Officer
(Male) Nowshera

(33)

8

ح

معارف میں

ایم مفل ہاک (PSHT)

آپ کا تبادلہ بحکم DEO صاحب نوشہرہ

Endstt: NO 7728-32 DEO (M) NSR Estab /

Branch / Transfer / Chowk (M) dated 12/06/2023

مکثیت (PSHT) بی بی ایس نصیرا پیناؤ بابا باب

تحصیل۔ ہائیڈرو سے بی بی ایس نصیرا 2 ناروجیب

تحصیل۔ پب کو میں چکا ہے۔

لہذا آپ کو آج مورخہ (20-09-2023) سے از روڈ نصیر

کو سکول ہڈا سے فارغ کیا جاتا ہے تاکہ مزکورہ

سکول میں چارج سنبھال سکے۔

میں سے ہی نیاڑھل (SPST) نے سکول ہڈا کے تمام ریسٹ

دیباؤ چیلے اور درست پائے اور کسی قسم کے واجباتہ رقم

دعویہ اسکے ذمے نہیں۔

HEAD MASTER
G. P. S. No. 1
Petafo Payan

District Education Officer
(Male) Nowshera

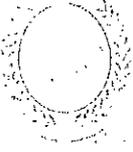
ASDEO (M)
Circle Khair Abad NSR

21/9/2023

(34)

(9)

(D)



OFFICE OF THE
ASSISTANT SUB-DIVISIONAL EDUCATION OFFICER (M)
CIRCLE PABBI TEHSIL PABBI DISTRICT NOWSHERA



No: 1238-40

Dated: 20/09/2023

CHARGE CERTIFICATE

Mr. FAZLI MALIK (PSHT) s/o MUHAMMAD AMIR KHAN you have been transferred vide DEO (M) NSR Endstt: No: 7728-32 dated 12/06/2023 from GPS No 1 Pitaw Payan Tehsil Jehangira to GPS No 2 Taru Jabba Tehsil Pabbi.

Hence the charge is handed over to you today dated 20-09-2023 afternoon.

All signed
[Signature]
District Education Officer
(Male) Nowshera

[Signature]
20/09/2023
ASDEO (M) Circle Pabbi
Assistant Sub-Divisional
Education Officer (M)
Circle Pabbi (NSR)

رجسٹری حاضری برائے سٹاف

گورنمنٹ پرائمری سکول (11)

تاریخ (35)

2023

ایابت ماہ اکتوبر

فضل مالک صاحب				محمد شاد صاحب				یوسف صاحب				ضیاء الرحمان صاحب			
PSHT				PST				SPST				SPST			
تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط
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بیماری	ایقتادہ	ایقتادہ	ایقتادہ	ایقتادہ	ایقتادہ	ایقتادہ	ایقتادہ	ایقتادہ	ایقتادہ	ایقتادہ	ایقتادہ	ایقتادہ	ایقتادہ	ایقتادہ	ایقتادہ

District Education Officer (Male) Nowshera

دستخط سربراہ ادارہ

گورنمنٹ پرائمری سکول میں تدریسی کارروائی کی تفصیلات
 بجٹ 2020-21
 ایسٹ - نومبر

فضلیہ اسکول				مدراسہ				مدراسہ				فضل مالک اسکول			
SPST				PST				SPST				PST			
تاریخ	آد	دقیقہ	رہائی	تاریخ	آد	دقیقہ	رہائی	تاریخ	آد	دقیقہ	رہائی	تاریخ	آد	دقیقہ	رہائی
1	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
2	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
3	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
4	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
5	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
6	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
7	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
8	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
9	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
10	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
11	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
12	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
13	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
14	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
15	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
16	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
17	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
18	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
19	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
20	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
21	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
22	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
23	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
24	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
25	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
26	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
27	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
28	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
29	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
30	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81
31	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81	8/15	11:30	81

چھٹیوں کی تفصیل											
نمبر	تاریخ	انتقال	بیمار	بیمار	بیمار	بیمار	بیمار	بیمار	بیمار	بیمار	بیمار
1											
2											
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دستخط سربراہ ادارہ

Signature
 District Education Officer
 (Male) Nowshera

بجٹ حاضری برائے شاف گورنمنٹ پرائمری سکول ایف تاروہیہ

ایستادہ ستمبر 2023

شاہد ابراہیم خان صاحب				محمد کونو صف صاحب				محمد شتور صاحب				محمد وہاب			
PST		SPST		PST		SPST		PST		SPST		PST		SPST	
آئی	آئی	آئی	آئی	آئی	آئی	آئی	آئی	آئی	آئی	آئی	آئی	آئی	آئی	آئی	آئی
1	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
2	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
3	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
4	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
5	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
6	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
7	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
8	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
9	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
11	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
12	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
13	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
14	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
15	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
16	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
17	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
18	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
19	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
20	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
21	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
22	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
23	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
24	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
25	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
26	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
27	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
28	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
29	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
30	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10
31	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10	7/20	7/15	7/10

چھٹیوں کی تفصیل		پریکٹس	امتحان	پریکٹس	امتحان	پریکٹس	امتحان	پریکٹس	امتحان

.....

رجسٹر حاضری برائے سٹاف

گورنمنٹ پرائمری سکول نمبر ۲ تاروجیت

2023

دسمبر

بابت ماہ

(37)

(135)

تاریخ	فضل مالک صاحب			محمد شہزاد صاحب			شیاء الرحمن صاحب			واجد علی صاحب		
	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
۱	81-	11/50	11/50	81-	11/50	11/50	81-	11/50	11/50	81-	11/50	11/50
۲	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۳	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۴	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۵	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۶	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۷	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۸	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۹	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۱۰	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۱۱	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۱۲	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۱۳	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۱۴	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۱۵	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۱۶	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۱۷	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۱۸	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۱۹	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۲۰	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۲۱	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۲۲	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۲۳	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۲۴	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۲۵	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۲۶	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۲۷	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۲۸	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۲۹	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۳۰	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30
۳۱	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30	81-	11/30	11/30

موسم سرما کی چھٹیاں

District Education Officer (Male) Nowshera

چھٹیوں کی تفصیل

تہہ	بیاری	اتفاقہ	میزرنگل	بیاری	اتفاقہ	میزرنگل	بیاری	اتفاقہ	میزرنگل	بیاری	اتفاقہ	میزرنگل
خالی ماہ	-	-	-	-	-	-	-	-	-	-	-	-
گذشتہ ماہ	-	-	-	-	-	-	-	-	-	-	-	-
میزرنگل	-	-	-	-	-	-	-	-	-	-	-	-

دستخط سربراہ ادارہ

(38) گورنمنٹ پرائمری سکول نمبر 2 ماروجیہ
 بابت ماہ ستمبر 2023

رجسٹر حاضری برائے سٹاف

اصناف بحال صحت			شمار ذرا الونگ			شاخہ سرکار			مساں حماد الحق صاحب			تاریخ
سندھ			جی. ڈی. لا رور			جی. ڈی. لا رور			PST			عہدہ
دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	
												1
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												31

چھٹیوں کی تفصیل

بیماری	اتفاقیہ	بیماری	اتفاقیہ	بیماری	اتفاقیہ	بیماری	اتفاقیہ	بیماری	اتفاقیہ

District Education Officer
 (Male) Nowshera

گی بنوری پراکری سولہ لاکھ تازہ کھجور

چتر جھڑی برائے سٹاف

2023

بابت ماہ اکتوبر

تاریخ	آمد		دستخط		رواگی		آمد		دستخط		رواگی		آمد		دستخط	
	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط
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16																
17																
18																
19																
20											12/35		72/-			
21											12/35		71.00			
22											10/30		71/-			
23											12/35		71/-			
24													71/-			
25											12/35		71.00			
26											12/35		71/-			
27											12/35		71/-			
28											12/35		71/-			
29													71/-			
30											12/35		70.00			
31																

چھٹیوں کی تفصیل

نمبر خوست	بیماری	انفاقہ	استحقاق	بیمز کل	بیماری	انفاقہ	استحقاق	بیمز کل	بیماری	انفاقہ	استحقاق	بیمز کل	بیماری	انفاقہ	استحقاق	بیمز کل
خالی ماہ	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
گذشتہ ماہ																
بیمز کل																

دستخط سربراہ ادارہ

[Signature]

گورنمنٹ پرائمری سکول نمبر 2 تاروچیتہ
 پاکستان فیروزکوٹہ
 رجسٹرڈ حاضر ہائے شاف

سن	آدم	فضل ملک صاحب		محمد شہزاد صاحب		صیاد الرحمن صاحب		واجد علی صاحب	
		رقبہ	رقبہ	رقبہ	رقبہ	رقبہ	رقبہ	رقبہ	رقبہ
1	81-	1134	1134	81-	1134	81-	1134	81-	1134
2	81-	1150	1150	81-	1150	81-	1150	81-	1150
3	81-	1150	1150	81-	1150	81-	1150	81-	1150
4									
5									
6									
7									
8									
9									
10	81-	1135	1135	81-	1135	81-	1135	81-	1135
11	81-	1135	1135	81-	1135	81-	1135	81-	1135
12	81-	1135	1135	81-	1135	81-	1135	81-	1135
13	81-	1135	1135	81-	1135	81-	1135	81-	1135
14	81-	1135	1135	81-	1135	81-	1135	81-	1135
15	81-	1135	1135	81-	1135	81-	1135	81-	1135
16	81-	1135	1135	81-	1135	81-	1135	81-	1135
17	81-	1135	1135	81-	1135	81-	1135	81-	1135
18	81-	1135	1135	81-	1135	81-	1135	81-	1135
19	81-	1135	1135	81-	1135	81-	1135	81-	1135
20	81-	1135	1135	81-	1135	81-	1135	81-	1135
21	81-	1135	1135	81-	1135	81-	1135	81-	1135
22	81-	1135	1135	81-	1135	81-	1135	81-	1135
23	81-	1135	1135	81-	1135	81-	1135	81-	1135
24	81-	1135	1135	81-	1135	81-	1135	81-	1135
25	81-	1135	1135	81-	1135	81-	1135	81-	1135
26	81-	1135	1135	81-	1135	81-	1135	81-	1135
27	81-	1135	1135	81-	1135	81-	1135	81-	1135
28	81-	1135	1135	81-	1135	81-	1135	81-	1135
29	81-	1135	1135	81-	1135	81-	1135	81-	1135
30	81-	1135	1135	81-	1135	81-	1135	81-	1135
31	81-	1135	1135	81-	1135	81-	1135	81-	1135
32	81-	1135	1135	81-	1135	81-	1135	81-	1135
33	81-	1135	1135	81-	1135	81-	1135	81-	1135
34	81-	1135	1135	81-	1135	81-	1135	81-	1135
35	81-	1135	1135	81-	1135	81-	1135	81-	1135
36	81-	1135	1135	81-	1135	81-	1135	81-	1135
37	81-	1135	1135	81-	1135	81-	1135	81-	1135
38	81-	1135	1135	81-	1135	81-	1135	81-	1135
39	81-	1135	1135	81-	1135	81-	1135	81-	1135
40	81-	1135	1135	81-	1135	81-	1135	81-	1135

چھٹیوں کی تفصیل

تاریخ	بیماری	تفصیل	بیماری	تفصیل	بیماری	تفصیل	بیماری	تفصیل

دستخط سربراہ ادارہ
 [Signature]

رجسٹر حاضری ہمارے شائق
 گورنمنٹ پرائمری سکول نمبر ۲ تارو حیدر
 بابت ماہ جنوری 2024

نام	فضل مالک صاحب	میاں حماد الحق	محمد طارق صاحب	ضیاء الرحمان صاحب
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تاریخ	آمد	دستخط	روایتی	دستخط	آمد	دستخط	روایتی	دستخط	آمد	دستخط	روایتی	دستخط
۱												
۲												
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۱۵	81-	11/35	8:30		81-	11/35	8:30					
۱۶	81-	11/30	8:30		81-	11/35	8:30					
۱۷	81-	11/30	8:30		81-	11/35	8:30					
۱۸	81-	11/30	8:30		81-	11/35	8:30					
۱۹	81-	11/50	8:30		81-	11/35	8:30					
۲۰	81-	11/30	8:30		81-	11/35	8:30					
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۲۸												
۲۹	81-	11/35	8:30		81-	11/35	8:30					
۳۰	81-	11/30	8:30		81-	11/35	8:30					
۳۱	81-	11/50	8:30		81-	11/35	8:30					

کولم سرما کی چھتیاں

جمعیت	بچے	مکمل	تعمیر	بچے	بچے	بچے	بچے	بچے	بچے	بچے

دستخط سربراہ ادارہ



Personnel Information of Mr FAZLI MALIK d/w/s of MOHAMMAD AMIR

Personnel Number: 00141061

CNIC: 1720122328393

NTN:

Date of Birth: 15.10.1967

Entry into Govt. Service: 01.04.1996

Length of Service: 27 Years 10 Months 001 Days

Employment Category: Active Temporary

Designation: PRIMARY SCHOOL HEAD TEACH

80719383-DISTRICT GOVERNMENT KHYBE

DDO Code: NR6344-Tehsil Pabbi Nowshera

Payroll Section: 001

GPF Section: 001

Cash Center: 5

GPF A/C No: EDUNR002278

GPF Interest applied

GPF Balance:

98,383.00 (provisional)

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil

BPS: 15

Pay Stage: 23

Wage type		Amount	Wage type		Amount
0001	Basic Pay	69,460.00	1001	House Rent Allowance 45%	3,524.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1505	Charge Allowance	40.00	2148	15% Adhoc Relief All-2013	888.00
2199	Adhoc Relief Allow @10%	594.00	2316	Teaching Allowance 2021	3,224.00
2341	Dispr. Red All 15% 2022KP	6,608.00	2347	Adhoc Rel Al 15% 22(PS17)	6,608.00
2378	Adhoc Relief All 2023 35%	23,618.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3015	GPF Subscription	-4,290.00	3501	Benevolent Fund	-1,200.00
3609	Income Tax	-2,711.00	3990	Emp.Edu. Fund KPK	-135.00
4004	R. Benefits & Death Comp:	-600.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 42,142.38 Recovered till JAN-2024: 18,052.00 Exempted: 10535.53 Recoverable: 13,554.85

Gross Pay (Rs.): 118,920.00 Deductions: (Rs.): -8,936.00 Net Pay: (Rs.): 109,984.00

Payee Name: FAZLI MALIK

Account Number: PLS000000015555

Bank Details: NATIONAL BANK OF PAKISTAN, 230824 TARU JABA TARU JABA, PESHAWAR

Leaves: Opening Balance:

Availed:

Earned:

Balance:

District
District Education Officer
(Male) Nowshera

Permanent Address: NSR

City: NOWSHERA

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: f.malikonline@gmail.com

Salary slip of Fazli Malik
G.P.S. No. 2 Taru Jabba
Ten: Pabbi

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWARSCANNED
KPST
Peshawar

In Service Appeal No. 65/2024

Mr. Ajmal KhanAppellant.
Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Diary No. 12046

Dated 02-04-24

Secretary to Govt of KPK Peshawar..... Respondents.

Subject:- APPLICATION FOR DELETION THE NAME OF RESPONDENT
(SECRETARY ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT) FROM THE PANEL OF RESPONDENTRespectfully sheweth,The respondent No. 01 most humbly submits as under:-

1. That as per the Khyber Pakhtunkhwa Service Tribunal letter dated 02-02-2024, "unnecessary parties are also arrayed as respondents, whereas, Rule-6(4) of the Rules requires that the competent authority whose order is challenged, shall be shown as respondent No. 01" (F/A).
2. That in the subject Service Appeal the applicant is PSHT (BPS-15) which comes under the competency of District Education Officer/Director Elementary & Secondary Education.
3. That it is pertinent to mention here that the Civil Servant (BPS-16) and below comes under the competency of Director Elementary & Secondary Education and District Education Officers.
4. That the Secretary Elementary & Secondary Education is unnecessary parte in all Service Appeal of BPS-16 & below and required deletion from the list of respondents.

Prayer:- In view of the above, it is humbly requested that the Secretary Elementary & Secondary Education being Proforma Respondent in cases of BPS-16 & below employee of Elementary & Secondary Education may kindly be deleted from the panel of respondents please.


SECRETARY
Elementary & Secondary Education,
Department Khyber Pakhtunkhwa.
(Respondent No.1)

1/4/24 DB Peshawar

Order sheet not
attached

قیمت 50 روپے	25886	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
ایڈویکٹ: میر گل	بار کونسل ایسوسی ایشن نمبر: be-10-7354	PESHAWAR BAR ASSOCIATION
رابطہ نمبر: 0300-2981781		
		

سروس ٹرا بیورل خیبر پختونخواہ پشاور

UNNED
PST
Peshawar

مخاطب: ایڈیلیٹ	دعویٰ: سروس ایبل
اجل قانون - ایڈیلیٹ	علت نمبر:
بنام حکومت خیبر پختونخواہ حوالہ پتر رجب سیکشنری رجسٹریشن کمیٹی خیبر پختونخواہ	مورخہ:
	جرم:
	تھانہ:

بابت تحریر آگے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
آن مقام ^{KPK} سروس ٹرا بیورل کیلئے میر گل و دیگر دست کو وکیل مقرر
کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال 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
زیریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی آیا ڈگری یا یکطرفہ یا ایبل کی برآمدگی اور منسوخی، نیز
دائر کرنے ایبل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ سے کل یا جزوی
کارروائی 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 بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخلہ منظور و قبول ہوگا
دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے
باہر ہو تو وکیل صاحب باہندانہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

PESHAWAR BAR ASSOCIATION
KHYBER PAKHTOON

المرقوم: 22/12/20

العبد گواہ شد العبد

مقام کے لیے منظور ہے۔

Attested &
Accepted

نوٹ: اس وکالت نامہ کی فوٹو کاپی نا قابل قبول ہوگی۔



اجل قانون