

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 12742

Dated 14-05-2024

CMA No _____ of 2024

IN

Service Appeal No: 323 of 2024

Qazi Muhammad Aamir Khan S/O Qazi Muhammad Nawaz Khan,
Principal, GHS No 1 Havelain, Abbottabad.

Appellant

Versus

1 The Chief Minister through Principal Secretary to Chief Minister
Government of Khyber Pakhtunkhwa, Peshawar.

2 The Government of Khyber Pakhtunkhwa through Secretary (Elementary
& Secondary Education), Department, Peshawar.

Respondents

APPLICATION FOR ALLOWING AMENDMENT IN HEADING
AND PRAYER OF THE TITLED SERVICE APPEAL TO THE
EXTENT OF FINAL ORDER DATED 27/02/2024 ISSUED UNDER
NO SO(B/T)E & SE/11-13/SS ISLAMIYAT/1155 PASSED BY
RESPONDENT NO 01 AND ISSUED/CONVEYED THROUGH
RESPONDENT NO 2.

INDEX

S.No	DESC: OF DOCUMENTS	ANNEXURES	PAGE No
1	Memo; of amendment application with affidavit	----	1 to 2
2	Copy of final order dated 27/02/2024 issued under no so(b/t)e & se/11-13/ss islamiyat/1155	K	3

Dated 04/05/2024

(Qazi Muhammad Aamir Khan)

Appellant

(Rashid Iqbal Khan Jadoon)
Advocate IBC Islamabad
Attorney Abbottabad.

Through

(Shahzad Shakoor)
Advocate High Court Abbottabad

Abbott Law Chamber Office No 6,
Ayub Tanoli lawyer plaza Abbottabad. 0333-5025002, 0316-9343818

By Post

(1)

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.**

CMA No _____ of 2024

IN

Service Appeal No: 323 of 2024

Qazi Muhammad Aamir Khan S/O Qazi Muhammad Nawaz Khan,
Principal, GHS No 1 Havelain, Abbottabad.

Appellant

Versus

- 1 The Chief Minister through Principal Secretary to Chief Minister Government of Khyber Pakhtunkhwa, Peshawar.
- 2 The Government of Khyber Pakhtunkhwa through Secretary (Elementary & Secondary Education), Department, Peshawar.

Respondents

APPLICATION FOR ALLOWING AMENDMENT IN
HEADING AND PRAYER OF THE TITLED SERVICE
APPEAL TO THE EXTENT OF FINAL ORDER DATED
27/02/2024 ISSUED UNDER NO SO(B/T)E & SE/11-13/SS
ISLAMIYAT/1155 PASSED BY RESPONDENT NO 01 AND
ISSUED/CONVEYED THROUGH RESPONDENT NO 2

Respectfully Sheweth,


FACTS

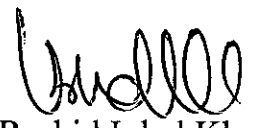
- 1) That appellant preferred departmental appeal against the impugned Notification NO. SO(B&T)E & SE/11-13/SS ISLAMIYAT/TBB/26 dated 19/10/2023, which was not decided within the statutory period of 90 days by the respondent No 1, whereupon appellant filed titled appeal before this Honourable Tribunal on 27/06/2024 at Camp Court Abbottabad.

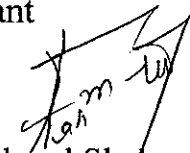
- 2) That during the pendency of titled service appeal, pending appellant's departmental appeal was rejected through order Dated 27/02/2024 issued under No SO(B/T)E &SE/11-13/SS ISLAMMIYAT/1155 passed by respondent no. 01 and issued/conveyed through respondent no 2. Copy of Departmental Appeal rejection order, is annexed as Annexure "K".
- 3) That in the present circumstances value-able rights of appellant are involved, thus to avoid any complications in the titled appeal in future, appellant wants and requests for amendment in the titled service appeal to the extent of final order dated 27/02/2024 in the heading & prayer of titled appeal.

It is, therefore, respectfully prayed that on acceptance of instant application for amendment may please be allowed in the interest of justice.

Dated 04/05/2024


 (Qazi Muhammad Aamir Khan)
 Appellant


 (Rashid Iqbal Khan Jadoon)
 Advocate IBC Islamabad



 (Shahzad Shakoor)
 Advocate High Court Abbottabad

Attorney Abbottabad.
 Abbott Law Chamber
 Office No 51, Ayub Tanoli lawyer plaza
 Abbottabad. 0333-5025002, 0316-9343818

AFFIDAVIT

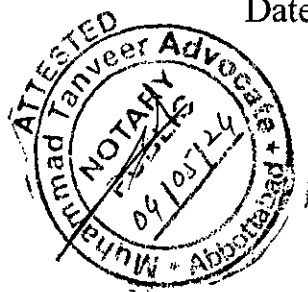
I, Qazi Muhammad Aamir Khan S/O Qazi Muhammad Nawaz Khan, Principal, GHS No 1 Havelain, Abbottabad, do here by affirm on oath that contents of instant application is correct and true according to my best knowledge and belief and nothing has been suppressed from this Honourable Tribunal.

Dated 04/05/2024


 (Qazi Muhammad Aamir Khan)
 Appellant

CNIC No 13101-0829865-1

DEPONENT



Annexure K,

3

MOST IMMEDIATE



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

Block "A" Civil Secretariat Peshawar.

No.SO(B/T)E&SE/11-13/SS Islamiyat
Dated Peshawar the 27.02.2024

11154

To

The Section Officer (Lit/Estt),
Chief Minister's Secretariate,
Khyber Pakhtunkhwa, Peshawar.

SUBJECT: INITIATION OF DISCIPLINARY PROCEEDINGS AGAINST THE OFFICERS OF E&SE DEPARTMENT ON ACCOUNT OF SERIOUS MISTAKES AND ERRORS IN THE TEXTBOOKS OF ISLAMIYAT FOR CLASSES 4th 7th & 8th FOR THE ACADEMIC YEAR 2022-23.

I am directed to refer to your letter No. SO(Lit/Estt/CMS/KP/4-1/Appeal/2023/2344 dated 17.11.2023 on the subject cited above and to convey that the Competent Authority (Chief Minister Khyber Pakhtunkhwa) has rejected the review petition/appeal of Qazi Muhammad Aamir Khan, Principal (BS-19) GHS No.1 Haveliyan Abbottabad, please.

(NASEEM KHAN)

SECTION OFFICER (Board & Trg)
E&SE Department

Endst: of even No. date.

Copy is forwarded for information:-

1. Director, Directorate of E&SE, Peshawar.
2. Section Officer (Male) E&SE Deptt:
3. Qazi Muhammad Aamir Khan, Principal (BS-19) GHS No.1 Haveliyan Abbottabad.
4. P.S to Secretary E&SE Department.
5. P.A to Additional Secretary (Gen) E&SE Department.
6. PA to Deputy Secretary (B&Trg), E&SE Department.

Atty
Atty

SECTION OFFICER (Board & Trg)
E&SE Department

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

How, the
Member copy.

CMA No _____ of 2024

IN

Service Appeal No: 323 of 2024

Qazi Muhammad Aamir Khan S/O Qazi Muhammad Nawaz Khan,
Principal, GHS No 1 Havelain, Abbottabad.

Appellant

Versus

1 The Chief Minister through Principal Secretary to Chief Minister
Government of Khyber Pakhtunkhwa, Peshawar.

2 The Government of Khyber Pakhtunkhwa through Secretary (Elementary
& Secondary Education), Department, Peshawar.

Respondents

APPLICATION FOR ALLOWING AMENDMENT IN HEADING
AND PRAYER OF THE TITLED SERVICE APPEAL TO THE
EXTENT OF FINAL ORDER DATED 27/02/2024 ISSUED UNDER
NO SO(B/T)E & SE/11-13/SS ISLAMIYAT/1155 PASSED BY
RESPONDENT NO 01 AND ISSUED/CONVEYED THROUGH
RESPONDENT NO 2.

INDEX

S.No	DESC: OF DOCUMENTS	ANNEXURES	PAGE No
1	Memo; of amendment application with affidavit	----	1 to 2
2	Copy of final order dated 27/02/2024 issued under no so(b/t)e & se/11-13/ss islamiyat/1155	K	3

Dated 04/05/2024

(Qazi Muhammad Aamir Khan)
Appellant

(Rashid Iqbal Khan Jadoon)
Advocate IBC Islamabad
Attorney Abbottabad.

Through

(Shahzad Shakoor)
Advocate High Court Abbottabad

Abbott Law Chamber Office No 6,
Ayub Tanoli lawyer plaza Abbottabad. 0333-5025002, 0316-9343818

①

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.**

CMA No _____ of 2024

IN

Service Appeal No: 323 of 2024

Qazi Muhammad Aamir Khan S/O Qazi Muhammad Nawaz Khan,
Principal, GHS No 1 Havelain, Abbottabad.

Appellant

Versus

- 1 The Chief Minister through Principal Secretary to Chief Minister Government of Khyber Pakhtunkhwa, Peshawar.
- 2 The Government of Khyber Pakhtunkhwa through Secretary (Elementary & Secondary Education), Department, Peshawar.

Respondents

APPLICATION FOR ALLOWING AMENDMENT IN
HEADING AND PRAYER OF THE TITLED SERVICE
APPEAL TO THE EXTENT OF FINAL ORDER DATED
27/02/2024 ISSUED UNDER NO SO(B/T)E & SE/11-13/SS
ISLAMIYAT/1155 PASSED BY RESPONDENT NO 01 AND
ISSUED/CONVEYED THROUGH RESPONDENT NO 2

Respectfully Sheweth,

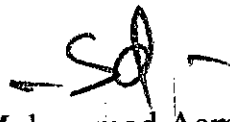
FACTS


- 1) That appellant preferred departmental appeal against the impugned Notification NO. SO(B&T)E & SE/11-13/SS ISLAMIYAT/TBB/26 dated 19/10/2023, which was not decided within the statutory period of 90 days by the respondent No 1, whereupon appellant filed titled appeal before this Honourable Tribunal on 27/06/2024 at Camp Court Abbottabad.


- 2) That during the pendency of titled service appeal, pending appellant's departmental appeal was rejected through order Dated 27/02/2024 issued under No SO(B/T)E & SE/11-13/SS ISLAMMIYAT/1155 passed by respondent no 01 and issued/conveyed through respondent no 2. Copy of Departmental Appeal rejection order, is annexed as Annexure "K".
- 3) That in the present circumstances value-able rights of appellant are involved, thus to avoid any complications in the titled appeal in future, appellant wants and requests for amendment in the titled service appeal to the extent of final order dated 27/02/2024 in the heading & prayer of titled appeal.

It is, therefore, respectfully prayed that on acceptance of instant application for amendment may please be allowed in the interest of justice.

Dated 04/05/2024


 (Qazi Muhammad Aamir Khan)
 Appellant

 Through
 (Rashid Iqbal Khan Jadoon)
 Advocate IBC Islamabad



 (Shahzad Shakoor)
 Advocate High Court Abbottabad

Attorney Abbottabad.
 Abbott Law Chamber
 Office No 51, Ayub Tanoli lawyer plaza
 Abbottabad. 0333-5025002, 0316-9343818

AFFIDAVIT

I, Qazi Muhammad Aamir Khan S/O Qazi Muhammad Nawaz Khan, Principal, GHS No 1 Havelain, Abbottabad, do here by affirm on oath that contents of instant application is correct and true according to my best knowledge and belief and nothing has been suppressed from this Honourable Tribunal.

Dated 04/05/2024


 (Qazi Muhammad Aamir Khan)
 Appellant

Annexure K,

3

MOST IMMEDIATE



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

Block "A" Civil Secretariat Peshawar.

No.SO(B/T)E&SE/11-13/SS Islamiyat
Dated Peshawar the 27.02.2024

11/59

To

The Section Officer (Liaison),
Chief Minister's Secretariate,
Khyber Pakhtunkhwa, Peshawar

SUBJECT: INITIATION OF DISCIPLINARY PROCEEDINGS AGAINST THE OFFICERS OF E&SE DEPARTMENT ON ACCOUNT OF SERIOUS MISTAKES AND ERRORS IN THE TEXTBOOKS OF ISLAMIYAT FOR CLASSES 7th & 8th FOR THE ACADEMIC YEAR 2022-23.

I am directed to refer to your letter No. SO(LIAISON)/CMS/KP/4-1/Appeal/2023/2344 dated 17/11/2023 on the subject cited above and to convey that the Competent Authority (Chief Minister Khyber Pakhtunkhwa) has rejected the review petition/appeal of Qazi Muhammad Aamir Khan, Principal (BS-19) GHS No.1 Haveliyan Abbottabad, please.

Handled by

(NASEEM KHAN)
SECTION OFFICER (Board & Trg)
E&SE Department

Endst: of even No. date.

Copy is forwarded for information:-

1. Director, Directorate of E&SE, Peshawar.
2. Section Officer (Male) E&SE Deptt:
3. Qazi Muhammad Aamir Khan, Principal (BS-19) GHS No.1 Haveliyan Abbottabad.
4. P.S to Secretary E&SE Department.
5. P.A to Additional Secretary (Gen) E&SE Department.
6. PA to Deputy Secretary (B&Trg), E&SE Department.

SECTION OFFICER (Board & Trg)
E&SE Department

(S)

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.**

*Copy Gout
Pleadu*

CMA No _____ of 2024

IN

Service Appeal No: 323 of 2024

Qazi Muhammad Aamir Khan S/O Qazi Muhammad Nawaz Khan,
Principal, GHS No 1 Havelain, Abbottabad.

Appellant

Versus

- 1 The Chief Minister through Principal Secretary to Chief Minister Government of Khyber Pakhtunkhwa, Peshawar.
- 2 The Government of Khyber Pakhtunkhwa through Secretary (Elementary & Secondary Education), Department, Peshawar.

Respondents

APPLICATION FOR ALLOWING AMENDMENT IN HEADING AND PRAYER OF THE TITLED SERVICE APPEAL TO THE EXTENT OF FINAL ORDER DATED 27/02/2024 ISSUED UNDER NO SO(B/T)E & SE/11-13/SS ISLAMIYAT/1155 PASSED BY RESPONDENT NO 01 AND ISSUED/CONVEYED THROUGH RESPONDENT NO 2.

INDEX

S.No	DESC: OF DOCUMENTS	ANNEXURES	PAGE No
1	Memo; of amendment application with affidavit	---	1 to 2
2	Copy of final order dated 27/02/2024 issued under no so(b/t)e & se/11-13/ss islamiyat/1155	K	3

Dated 04/05/2024

Sd/-
(Qazi Muhammad Aamir Khan)
Appellant

Sd/-
(Rashid Iqbal Khan Jadoon)
Advocate IBC Islamabad
Attorney Abbottabad.

Through

Sd/-
(Shahzad Shakoor)
Advocate High Court Abbottabad

Abbott Law Chamber Office No 6,
Ayub Tanoli lawyer plaza Abbottabad. 0333-5025002, 0316-9343818

(1)

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.**

CMA No _____ of 2024

IN

Service Appeal No: 323 of 2024

Qazi Muhammad Aamir Khan S/O Qazi Muhammad Nawaz Khan,
Principal, GHS No 1 Havelain, Abbottabad.

Appellant

Versus

- 1 The Chief Minister through Principal Secretary to Chief Minister Government of Khyber Pakhtunkhwa, Peshawar.
- 2 The Government of Khyber Pakhtunkhwa through Secretary (Elementary & Secondary Education), Department, Peshawar.

Respondents

APPLICATION FOR ALLOWING AMENDMENT IN
HEADING AND PRAYER OF THE TITLED SERVICE
APPEAL TO THE EXTENT OF FINAL ORDER DATED
27/02/2024 ISSUED UNDER NO. SO(B/T)E & SE/11-13/SS
ISLAMİYAT/1155 PASSED BY RESPONDENT NO 01 AND
ISSUED/CONVEYED THROUGH RESPONDENT NO 2

Respectfully Sheweth,


FACTS

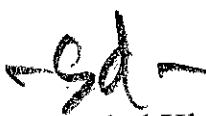
- 1) That appellant preferred departmental appeal against the impugned Notification NO. SO(B&T)E & SE/11-13/SS ISLAMİYAT/TBB/26 dated 19/10/2023, which was not decided within the statutory period of 90 days by the respondent No 1, whereupon appellant filed titled appeal before this Honourable Tribunal on 27/06/2024 at Camp Court Abbottabad.

- 2) That during the pendency of titled service appeal, pending appellant's departmental appeal was rejected through order Dated 27/02/2024 issued under No SO(B/T)E &SE/11-13/SS ISLAMİYAT/1155 passed by respondent no 01 and issued/conveyed through respondent no 2. Copy of Departmental Appeal rejection order, is annexed as Annexure "K".
- 3) That in the present circumstances value-able rights of appellant are involved, thus to avoid any complications in the titled appeal in future, appellant wants and requests for amendment in the titled service appeal to the extent of final order dated 27/02/2024 in the heading & prayer of titled appeal.

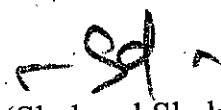
It is, therefore, respectfully prayed that on acceptance of instant application for amendment may please be allowed in the interest of justice.

Dated 04/05/2024


 (Qazi Muhammad Aamir Khan)
 Appellant


 (Rashid Iqbal Khan Jadoon)
 Advocate IBC Islamabad

Through



 (Shahzad Shakoor)
 Advocate High Court Abbottabad

Attorney Abbottabad.
 Abbott Law Chamber
 Office No 51, Ayub Tanoli lawyer plaza
 Abbottabad. 0333-5025002, 0316-9343818

AFFIDAVIT

I, Qazi Muhammad Aamir Khan S/O Qazi Muhammad Nawaz Khan, Principal, GHS No 1 Havelain, Abbottabad, do here by affirm on oath that contents of instant application is correct and true according to my best knowledge and belief and nothing has been suppressed from this Honourable Tribunal.

Dated 04/05/2024


 (Qazi Muhammad Aamir Khan)
 Appellant

MOST IMMEDIATE



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

Block "A" Civil Secretariat Peshawar.

No.SO(B/T)E&SE/11-13/SS/Is/amiyat
Dated Peshawar the 27.02.2024

11156

To

The Section Officer (Li/Lt),
Chief Minister's Secretariate,
Khyber Pakhtunkhwa, Peshawar

SUBJECT: INITIATION OF DISCIPLINARY PROCEEDINGS AGAINST THE OFFICERS OF E&SE DEPARTMENT ON ACCOUNT OF SERIOUS MISTAKES AND ERRORS IN THE TEXTBOOKS OF ISLAMIYAT FOR CLASSES 4th, 7th & 8th FOR THE ACADEMIC YEAR 2023-23.

I am directed to refer to your letter No. SO(Li/Lt)/CMS/KP/4-1/Appeal/2023/2344 dated 17/11/2023 on the subject cited above and to convey that the Competent Authority (Chief Minister Khyber Pakhtunkhwa) has rejected the review petition/appeal of Qazi Muhammad Aamir Khan, Principal (BS-19) GHS No.1 Haveliyan Abbottabad, please.

(NASEEM KHAN)
SECTION OFFICER (Board & Trg)
E&SE Department

Endst: of even No. date.

Copy is forwarded for information:-

1. Director, Directorate of E&SE, Peshawar.
2. Section Officer (Male) E&SE Deptt:
3. Qazi Muhammad Aamir Khan, Principal (BS-19) GHS No.1 Haveliyan Abbottabad.
4. P.S to Secretary E&SE Department.
5. P.A to Additional Secretary (Gen) E&SE Department.
6. PA to Deputy Secretary (B&Trg), E&SE Department.

SECTION OFFICER (Board & Trg)
E&SE Department

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Copy (Respondents)

CMA No _____ of 2024

IN

Service Appeal No: 323 of 2024

Qazi Muhammad Aamir Khan S/O Qazi Muhammad Nawaz Khan,
Principal, GHS No 1 Havelain, Abbottabad.

Appellant

Versus

1 The Chief Minister through Principal Secretary to Chief Minister
Government of Khyber Pakhtunkhwa, Peshawar.

2 The Government of Khyber Pakhtunkhwa through Secretary (Elementary
& Secondary Education), Department, Peshawar.

Respondents

APPLICATION FOR ALLOWING AMENDMENT IN HEADING
AND PRAYER OF THE TITLED SERVICE APPEAL TO THE
EXTENT OF FINAL ORDER DATED 27/02/2024 ISSUED UNDER
NO SO(B/T)E & SE/11-13/SS ISLAMIYAT/1155 PASSED BY
RESPONDENT NO 01 AND ISSUED/CONVEYED THROUGH
RESPONDENT NO 2.

INDEX

S.No	DESC: OF DOCUMENTS	ANNEXURES	PAGE No
1	Memo; of amendment application with affidavit	----	1 to 2
2	Copy of final order dated 27/02/2024 issued under no so(b/t)e & se/11-13/ss islamiyat/1155	K	3

Dated 04/05/2024

(Qazi Muhammad Aamir Khan)
Appellant

(Rashid Iqbal Khan Jadoon)
Advocate IBC Islamabad
Attorney Abbottabad.

Through

(Shahzad Shakoor)
Advocate High Court Abbottabad

Abbott Law Chamber Office No 6,
Ayub Tanoli lawyer plaza Abbottabad. 0333-5025002, 0316-9343818

①

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.**

CMA No _____ of 2024

IN

Service Appeal No: 323 of 2024

Qazi Muhammad Aamir Khan S/O Qazi Muhammad Nawaz Khan,
Principal, GHS No 1 Havelain, Abbottabad.

Appellant

Versus

- 1 The Chief Minister through Principal Secretary to Chief Minister Government of Khyber Pakhtunkhwa, Peshawar.
- 2 The Government of Khyber Pakhtunkhwa through Secretary (Elementary & Secondary Education), Department, Peshawar.

Respondents

APPLICATION FOR ALLOWING AMENDMENT IN
HEADING AND PRAYER OF THE TITLED SERVICE
APPEAL TO THE EXTENT OF FINAL ORDER DATED
27/02/2024 ISSUED UNDER NO SO(B/T)E & SE/11-13/SS
ISLAMIYAT/1155 PASSED BY RESPONDENT NO 01 AND
ISSUED/CONVEYED THROUGH RESPONDENT NO 2

Respectfully Sheweth,

FACTS

- 1) That appellant preferred departmental appeal against the impugned Notification NO. SO(B&T)E & SE/11-13/SS ISLAMIYAT/TBB/26 dated 19/10/2023, which was not decided within the statutory period of 90 days by the respondent No 1, whereupon appellant filed titled appeal before this Honourable Tribunal on 27/06/2024 at Camp Court Abbottabad.

- 2) That during the pendency of titled service appeal, pending appellant's departmental appeal was rejected through order Dated 27/02/2024 issued under No SO(B/T)E &SE/11-13/SS ISLAMİYAT/1155 passed by respondent no 01 and issued/conveyed through respondent no 2. Copy of Departmental Appeal rejection order, is annexed as Annexure "K".
- 3) That in the present circumstances value-able rights of appellant are involved, thus to avoid any complications in the titled appeal in future, appellant wants and requests for amendment in the titled service appeal to the extent of final order dated 27/02/2024 in the heading & prayer of titled appeal.

It is, therefore, respectfully prayed that on acceptance of instant application for amendment may please be allowed in the interest of justice.

Dated 04/05/2024

(Qazi Muhammad Aamir Khan)
Appellant

Through
(Rashid Iqbal Khan Jadoon)
Advocate IBC Islamabad

(Shahzad Shakoor)
Advocate High Court Abbottabad

Attorney Abbottabad.
Abbott Law Chamber
Office No 51, Ayub Tanoli lawyer plaza
Abbottabad. 0333-5025002, 0316-9343818

AFFIDAVIT

I, Qazi Muhammad Aamir Khan S/O Qazi Muhammad Nawaz Khan, Principal, GHS No 1 Havelain, Abbottabad, do here by affirm on oath that contents of instant application is correct and true according to my best knowledge and belief and nothing has been suppressed from this Honourable Tribunal.

Dated 04/05/2024

(Qazi Muhammad Aamir Khan)
Appellant

3

MOST IMMEDIATE



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

Block "A" Civil Secretariat Peshawar.

No.SO(B/T)E&SE/11-13/SS Islamiyat
Dated Peshawar the 27.02.2024

1156

To

The Section Officer (Lat/E&tt),
Chief Minister's Secretariate,
Khyber Pakhtunkhwa, Peshawar

SUBJECT: INITIATION OF DISCIPLINARY PROCEEDINGS AGAINST THE OFFICERS OF E&SE DEPARTMENT ON ACCOUNT OF SERIOUS MISTAKES AND ERRORS IN THE TEXTBOOKS OF ISLAMIYAT FOR CLASSES 4th, 7th & 8th FOR THE ACADEMIC YEAR 2022-23.

I am directed to refer to your letter No. SO(Lat/E&tt) MS/KP/A-1/Appeal/2023/2344 dated 17.11.2023 on the subject cited above and to convey that the Competent Authority (Chief Minister Khyber Pakhtunkhwa) has rejected the review petition/appeal of Qazi Muhammad Aamir Khan, Principal (BS-19) GHS No.1 Haveliyan Abbottabad, please.

(NASEEM KHAN)
SECTION OFFICER (Board & Trg)
E&SE Department

Endst: of even No. date.

Copy is forwarded for information:-

1. Director, Directorate of E&SE, Peshawar.
2. Section Officer (Male) E&SE Deptt:
3. Qazi Muhammad Aamir Khan, Principal (BS-19) GHS No.1 Haveliyan Abbottabad.
4. P.S to Secretary E&SE Department.
5. P.A to Additional Secretary (Gen) E&SE Department.
6. PA to Deputy Secretary (B&Trg), E&SE Department.

(Signature)
SECTION OFFICER (Board & Trg)
E&SE Department

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.**

CMA No _____ of 2024

IN

Service Appeal No: 323 of 2024

Qazi Muhammad Aamir Khan S/O Qazi Muhammad Nawaz Khan,
Principal, GHS No 1 Havelain, Abbottabad.

Appellant

Versus

- 1 The Chief Minister through Principal Secretary to Chief Minister Government of Khyber Pakhtunkhwa, Peshawar.
- 2 The Government of Khyber Pakhtunkhwa through Secretary (Elementary & Secondary Education), Department, Peshawar.

Respondents

APPLICATION FOR ALLOWING AMENDMENT IN HEADING AND PRAYER OF THE TITLED SERVICE APPEAL TO THE EXTENT OF FINAL ORDER DATED 27/02/2024 ISSUED UNDER NO SO(B/T)E & SE/11-13/SS ISLAMIYAT/1155 PASSED BY RESPONDENT NO 01 AND ISSUED/CONVEYED THROUGH RESPONDENT NO 2.

INDEX

S.No	DESC: OF DOCUMENTS	ANNEXURES	PAGE No
1	Memo; of amendment application with affidavit	----	1 to 2
2	Copy of final order dated 27/02/2024 issued under no so(b/t)e & se/11-13/ss islamiyat/1155	K	3

Dated 04/05/2024

(Qazi Muhammad Aamir Khan)
Appellant

Through
(Rashid Iqbal Khan Jadoon)
Advocate IBC Islamabad
Attorney Abbottabad.

(Shahzad Shakoor)
Advocate High Court Abbottabad

Abbott Law Chamber Office No 6,
Ayub Tanoli lawyer plaza Abbottabad. 0333-5025002, 0316-9343818

①

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.**

CMA No _____ of 2024

IN

Service Appeal No: 323 of 2024

Qazi Muhammad Aamir Khan S/O Qazi Muhammad Nawaz Khan,
Principal, GHS No 1 Havelain, Abbottabad.

Appellant

Versus

- 1 The Chief Minister through Principal Secretary to Chief Minister Government of Khyber Pakhtunkhwa, Peshawar.
- 2 The Government of Khyber Pakhtunkhwa through Secretary (Elementary & Secondary Education), Department, Peshawar.

Respondents

APPLICATION FOR ALLOWING AMENDMENT IN
HEADING AND PRAYER OF THE TITLED SERVICE
APPEAL TO THE EXTENT OF FINAL ORDER DATED
27/02/2024 ISSUED UNDER NO SO(B/T)E & SE/11-13/SS
ISLAMIYAT/1155 PASSED BY RESPONDENT NO 01 AND
ISSUED/CONVEYED THROUGH RESPONDENT NO 2

Respectfully Sheweth,


FACTS


- 1) That appellant preferred departmental appeal against the impugned Notification NO. SO(B&T)E & SE/11-13/SS ISLAMIYAT/TBB/26 dated 19/10/2023, which was not decided within the statutory period of 90 days by the respondent No 1, whereupon appellant filed titled appeal before this Honourable Tribunal on 27/06/2024 at Camp Court Abbottabad.


- 2) That during the pendency of titled service appeal, pending appellant's departmental appeal was rejected through order Dated 27/02/2024 issued under No SO(B/T)E &SE/11-13/SS ISLAMİYAT/1155 passed by respondent no 01 and issued/conveyed through respondent no 2. Copy of Departmental Appeal rejection order, is annexed as **Annexure "K"**.
- 3) That in the present circumstances value-able rights of appellant are involved, thus to avoid any complications in the titled appeal in future, appellant wants and requests for amendment in the titled service appeal to the extent of final order dated 27/02/2024 in the heading & prayer of titled appeal.

It is, therefore, respectfully prayed that on acceptance of instant application for amendment may please be allowed in the interest of justice.

Dated 04/05/2024


(Qazi Muhammad Aamir Khan)
Appellant

Through

(Rashid Iqbal Khan Jadoon)
Advocate IBC Islamabad



(Shahzad Shakoor)
Advocate High Court Abbottabad

Attorney Abbottabad.
Abbott Law Chamber
Office No 51, Ayub Tanoli lawyer plaza
Abbottabad. 0333-5025002, 0316-9343818

AFFIDAVIT

I, Qazi Muhammad Aamir Khan S/O Qazi Muhammad Nawaz Khan, Principal, GHS No 1 Havelain, Abbottabad; do here by affirm on oath that contents of instant application is correct and true according to my best knowledge and belief and nothing has been suppressed from this Honourable Tribunal.

Dated 04/05/2024


(Qazi Muhammad Aamir Khan)
Appellant

CNIC No 13101-0829865-1

DEPONENT

MOST IMMEDIATE



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

Block "A" Civil Secretariat Peshawar.

No. SO(B/T)E&SE/11-13/SS Islamiyat
Dated Peshawar the 27.02.2024

11/58

To

The Section Officer (Law/E&SE),
Chief Minister's Secretariate,
Khyber Pakhtunkhwa, Peshawar.

SUBJECT: INITIATION OF DISCIPLINARY PROCEEDINGS AGAINST THE OFFICERS OF E&SE DEPARTMENT ON ACCOUNT OF SERIOUS MISTAKES AND ERRORS IN THE TEXTBOOKS OF ISLAMIYAT FOR CLASSES 4th, 7th & 8th FOR THE ACADEMIC YEAR 2022-23.

I am directed to refer to your letter No. SO(LAW/E&SE/CMS/KP/4-1/Appeal/2023/2344 dated 17.11.2023 on the subject cited above and to convey that the Competent Authority (Chief Minister Khyber Pakhtunkhwa) has rejected the review petition/appeal of Qazi Muhammad Aamir Khan, Principal (BS-19) GHS No.1 Haveliyan Abbotabad, please.

(NASEEM KHAN)
SECTION OFFICER (Board & Trg)
E&SE Department

Endst: of even No. date.

Copy is forwarded for information:-

1. Director, Directorate of E&SE, Peshawar.
2. Section Officer (Male) E&SE Deptt:
3. Qazi Muhammad Aamir Khan, Principal (BS-19) GHS No.1 Haveliyan Abbottabad.
4. P.S to Secretary E&SE Department
5. P.A to Additional Secretary (Gen) E&SE Department.
6. PA to Deputy Secretary (B&Trg), E&SE Department.

SECTION OFFICER (Board & Trg)
E&SE Department