

**BEFORE THE HONORABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA**

CM No _____ /2024

in

Implementation Petition No. 293 /2024

In line and with reference to

Service Appeal No. 409 of 2019

Gul Raj Khan (Management Cadre) directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar being representative of Management Cadre officers.

Petitioner

VERSUS

1. **Government of Khyber Pakhtunkhwa** through Secretary Elementary & Secondary Education Department Peshawar.
2. **Director Elementary & Secondary Education Department** Khyber Pakhtunkhwa.

Respondents

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2.	Notification dated 02/05/2024	A	3-4

Dated: 06/05/2024

Your Humble Petitioner

(Gul Raj Khan)
Through Counsel

Khalid Mahmood
Advocate High Court
Stationed at D.I.Khan

08-05-2024
S.B
Peshawar

**BEFORE THE HONORABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA**

CM No _____/2024
in

Implementation Petition No. 293 /2024

In line and with reference to

Service Appeal No. 409 of 2019

Khyber Pakhtunkhwa
Service Tribunal
Diary No. 12580
Dated 07-05-2024

Gul Raj Khan (Management Cadre) directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar being representative of Management Cadre officers.

Petitioner

VERSUS

3. **Government of Khyber Pakhtunkhwa** through Secretary Elementary & Secondary Education Department Peshawar.
4. **Director Elementary & Secondary Education Department** Khyber Pakhtunkhwa.

Respondents

CM FOR PLACING OF NOTIFICATION NO SO(MC)E&SED/4-16/2024/PT/MC/ASDEO DATED 02/05/2024 AS WELL AS SUSPENSION OF THE SAME NOTIFICATION TO THE EXTENT OF POSTING OF TEACHING CADRES AGAINST THE POST OF MANAGEMENT CADRES TILL DECISION OF ABOVE TITLED EXECUTION PETITION.

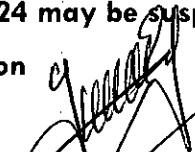
Respectfully Sheweth:

1. That the above titled implementation petition is pending before this Honorable Tribunal and fixed for implementation report on 08.05.2024
2. That above titled CM may be considered as part and parcel of the implementation petition.
3. That respondent No 1 inspite of submission of implementation report, issued notification dated 02/05/2024 (**Annexure A**) for posting of teaching cadre against the post of management

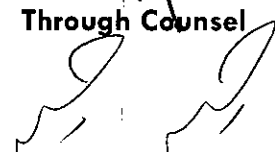
cadre which is also violation of judgement as well as Tribunal direction dated 23/04/2024 because Honorable Court directed the respondent vide judgement dated 07/08/2019, which is reproduced as under:

“the respondent department is also directed to forewith recall, all the transfer orders of the teachers against the administrative post”

It is therefore, humbly prayed that on acceptance of this CM, the notification dated 02/05/2024 may be suspended till decision of implementation petition

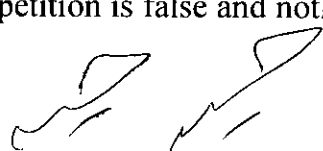

Yours humble Petitioner
Gul Raj Khan
Through Counsel

Dated: 06/05/2024


Khalid Mahmood
Advocate High court.
Stationed at D.I.Khan

AFFIDAVIT

I, **Gul Raj Khan**, Daughter of Feroz Khan Resident of New Kashkal House No.448, the petitioner, do hereby solemnly affirm and declare on oath that all the Para-wise contents of this CM Petition are correct and true to the best of my knowledge & belief. I further solemnly affirm and declare that no part of above petition is false and nothing material has been deliberately concealed.

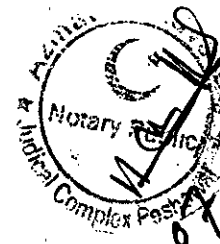

Identified by Counsel:

Khalid Mahmood AHC


Deponent

17301-5451023-4

ATTESTED





GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9210626

Dated: 02nd May, 2024

(3)
Anet (A)

NOTIFICATION

NO.SO/MCIE&SED/4-16/2024/PT/MC/ASDEO: The following posting / transfers are hereby ordered with immediate effect, in the best public interest: -

Sr. No	Name of officer	From	To
1.	Hafiz Fazli Akbar MC BS-17	Awaiting posting	SDEO (Male) Rustam Mardan vice Sr. No.2
2.	Mr. Nisar Ahmad Shamoza MC BS-17	SDEO (Male) Rustam Mardan	GHS Ghani Daulat Zai against the vacant post of HM.
3.	Mr. Saleh Muhammad MC BS-17	SDEO (Male) Swabi	GHS Boqo Swabi against the vacant post of HM.
4.	Mr. Muhamad Waqas TC BS-17	GHS Boqo Swabi	SDEO (Male) Swabi vice Sr. No. 3
5.	Mst. Rubina Khalilq MC BS-17	SDEO (Female) Chagarzal Buner	SDEO (Female) Razzar Swabi against the vacant post.
6.	Mst. Ruqiyat ur Zuhra TC BS-17	GGHSS Tordher Swabi	SDEO (Female) Lahore Swabi vice Sr. No. 8
7.	Mst. Huma Rehman TC BS-17	GGHSS Kalabat Swabi	SDEO (Female) Topi Swabi vice Sr. 10
8.	Mst. Dilraj MC BS-17	SDEO (Female) Lahore Swabi	Services placed at the disposal of Directorate of E&SE for further posting.
9.	Mst. Saeeda Bano MC BS-17	SDEO (Female) Swabi	Services placed at the disposal of Directorate of E&SE for further posting.
10.	Mst. Aneesa Jamshed MC BS-17	SDEO (Female) Topi Swabi	Services placed at the disposal of Directorate of E&SE for further posting.
11.	Mr. Abdul Wahab MC BS-17	SDEO (Male) Topi Swabi	SDEO (Male) Ghazi Haripur against the vacant post.
12.	Mr. Sikandar Hayat MC BS-17	SDEO (Male) Daggar Buner	SDEO (Male) Topi Swabi vice Sr. No. 11
13.	Mr. Fawad Khan SST (Bio/Chemistry) BS-16	GHSS Mankai Swabi	ASDEO Estab O/O DEO (Male) Swabi against the vacant post.
14.	Mr. Abdur Rasheed SST (SST General BS-16)	GMS Sogandy Swabi	ADEO Primary O/O DEO (Male) Swabi against the vacant post.

15.	Mr. Manzar Ali SST (Maths/Physics) BS-16	GHSS Manari Payan Swabi	ASDEO Razzar Swabi vice Sr. No. 16
16.	Mr. Ishaq Ali SST (General) BS-16	ASDEO Razzar Swabi	GHS No. 2 Dagal Swabi against the vacant post.
17.	Mr. Ali Must Khan SST (General BS-16)	GMS Sandwa Swabi	ADEO Litigation O/O DEO (Male) Swabi.
18.	Mst. Maryam Rehman SST IT BS-16	GGHS Yar Hussain Ziam, Swabi	ASDEO (Female) Razzar Swabi
19.	Mst. Rafiqah MC BS-16	ASDEO Razzar Swabi	Services placed at the disposal of DEO (Female) Swabi for further posting.
20.	Mr. Abdul Qayyum SST (General) BS-16	GHS No. 2 Tordher Swabi	ASDEO (Male) Lahore Swabi vice Sr. No. 22
21.	Mr. Muhammad Asif SST BS-16	GHS No. 2 Tordher Swabi	ASDEO (Male) Lahore Circle Kunda Swabi
22.	Mr. Abdullah MC BS-16	ASDEO (Male) Lahore Swabi	ASDEO (Male) Tehsil Swabi Muneeral Circle Swabi
23.	Mr. Imran Khan MC BS-16	ASDEO Tehsil Swabi	Services placed at the disposal of DEO (Male) Swabi for further posting.
24.	Mst. Humaira Naznin TC BS-16	ADEO (Female) Swabi	SDEO (Female) Swabi vice Sr. 9.

**SECRETARY TO THE GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT**

Endst. of even No. & date:

Copy forwarded for information to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
4. District Education Officers (Male/Female) Swabi and Mardan.
5. District Account Officer Swabi and Mardan.
6. PS to Minister for Elementary & Secondary Education, Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
8. Officers concerned.
9. Master file.



**(ARSALAN AHMED)
SECTION OFFICER (Management Cadre)**