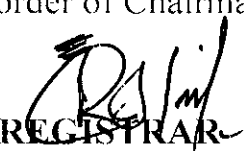


## FORM OF ORDER SHEET

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

**Appeal No.** 878/2024

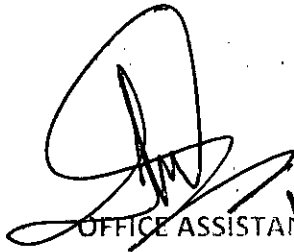
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/06/2024	<p>The appeal of Mr. Muhammad Rehman resubmitted today by himself. It is fixed for preliminary hearing before touring Single Bench at Swat on 02.07.2024. Parcha Peshi given to the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Muhammad Rehman received today i.e. on 11.06.2024 is incomplete on the following score which is returned to the appellant for completion and resubmission within 15 days.

- 1- Index of the appeal is not according to Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- In the memo of appeal the word petitioner is used but there is no provision in the Service Tribunal Act/rules 1974 for using the word of petitioner.

No. 158 /Inst;/2024/KPST,

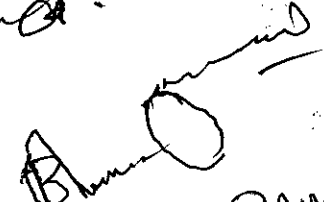
Dt. 12/06 /2024.

  
12/6/24  
OFFICE ASSISTANT  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Bahre Karam Adv.  
High Court Shangla.

Note

The objection raised by the Tribunal has been removed and appeal is re submitted.

  
BAHRE KARAM  
ADVOCATE

(1)

**BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL, PESHAWAR**

**Khyber Pakhtunkhwa  
Service Tribunal**

Service Appeal No. 878 /2024

Diary No. 13401

Dated: 11-06-2024

1. Muhammad Rahman S/o Amroz Khan Laboratory Assistant at Government Degree College Alpurai Shangla R/o Faizabad Alpurai, Tehsil Alpurai District Shangla.....(Appellant)

**V E R S U S**

1. Secretary Higher Education Department, Government Khyber Pukhtunkhawa, Peshawar.  
2. Director Higher Education Department, Government Khyber Pukhtunkhawa, Peshawar..... (Respondents)

**Service Appeal under section 4 of the N.W.F.P Service Tribunal Act 1974 wherein the departmental appeal of the appellant dated 05/03/2024 was not decided till the lapse of statutory period of limitation.**

**Prayer:**

On acceptance of this appeal, the denial of respondents be declared illegal, unlawful,

unconstitutional and void, and respondents may kindly be directed to promote the

appellant from 01/02/2016.

Any other relief not specifically prayed for, but this Honorable Tribunal deems proper

may also be granted.

**Respectfully Shewith:**

1. That the appellant is serving as Lab Assistant in Government Degree College Alpurai District Shangla.

2. That the petitioner was initially appointed as Laboratory Assistant on 06/12/1994. (Copy of the appointment order is attached as "A")

3. That the appellant was illegally and unlawfully removed from service in year 2011.

**BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. 878/2024

Muhammad Rahman ..... (Appellant)

**V E R S U S**

Secretary Higher Education Department & others..... (Respondents)

**I N D E X**

S. No	Description of Documents	Annex	Pages
1.	Service Appeal	---	1-5
2.	Appointment Order	"A"	6
3.	Service Tribunal Judgement	"B"	7-16
4.	Office Order	"C"	17-18
5.	Seniority List	"D"	19-22
6.	Promotion Order	"E"	23-25
7.	Departmental Appeal	"F"	26
8.	Wakalat Nama	---	27
9.			
10.			

*M. A. K.*  
**APPELLANT**

Through counsel *B. K.*

**BAHRE KARAM ADVOCATE**  
High Court.  
District Shangla Courts Shangla.  
Cell ,03454612812.

**BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. 878/2024

1. Muhammad Rahman S/o Amroz Khan Laboratory Assistant at Government Degree College Alpurai Shangla R/o Faizabad Alpurai, Tehsil Alpurai District Shangla.....(Appellant)

**V E R S U S**

- 1. Secretary Higher Education Department, Government Khyber Pukhtunkhawa, Peshawar.
- 2. Director Higher Education Department, Government Khyber Pukhtunkhawa, Peshawar..... (Respondents)

**Service Appeal under section 4 of the N.W.F.P Service Tribunal Act 1974 wherein the departmental appeal of the appellant dated 05/03/2024 was not decided till the lapse of statutory period of limitation.**

**Prayer:**

On acceptance of this appeal, the denial of respondents be declared illegal, unlawful, unconstitutional and void, and respondents may kindly be directed to promote the appellant from 01/02/2016.

Any other relief not specifically prayed for, but this Honorable Tribunal deems proper may also be granted.

**Respectfully Shewith:**

- 1. That the appellant is serving as Lab Assistant in Government Degree College Alpurai District Shangla.
- 2. That the appellant was initially appointed as Laboratory Assistant on 06/12/1994. (Copy of the appointment order is attached as "A")
- 3. That the appellant was illegally and unlawfully removed from service in year 2011.

(2)

4. That the appellant then filed service appeal against that illegal order and this Honorable Court while accepting the appeal reinstated the appellant with all back benefits. (Copy of judgment is attached as annexure "B").
5. That respondent no. 2 while in pursuance of the order of this honorable court issued order of reinstatement of the appellant with all back benefits. (Copy of office order is attached as annexure "C").
6. That there was no service structure of Laboratory Assistant before 2013.
7. That after 2013, a service structure of laboratory Assistant was prepared and list of seniority was issued by respondent no. 2, and due to illegal termination the name of appellant was not included in the list. (Copy of Seniority List is attached as annexure "D").
8. That during the termination period of appellant, the laboratory Assistants having same seniority were promoted to BPS-9 (Copy of Promotion order is attached as annexure "E").
9. That due to termination of the appellant, his name was not included in the seniority list and was not promoted.
10. That, when the appellant was reinstated with all back benefits, so the appellant submitted department appeal to respondents for his promotion.
11. That the departmental appeal dated 05/03/2024 was not decided till the lapse of statutory period of limitation. (Copy of the Departmental Appeal is attached as annexure "F")
12. Feeling aggrieved and find no other remedy, the appellant has been constrained to approaches this Honorable Service Tribunal for the redress of his grievance, inter alia, on the following grounds.

**Grounds:**

- I. That appellant has not been provided equal treatment when there is no express inhibition against him under the law and has also not been given equal protection of law, which is discriminatory instance of arbitrariness and is against the principle enshrined in article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- II. That the appellant has been subjected to injustice and the case of the appellant has not been dealt with under the principle of fair play.

- III. That refusal of the respondents to provide promotion to the appellant is illegal and unlawful as per rules.
- IV. That appellant is most senior according to service rules but due to his illegal termination, his name was not included in the seniority list.
- V. That as the court has set aside the illegal order of termination of the appellant and reinstated the appellant with all back benefits, respondent No. 2 is bound to place the appellant in the seniority list and promote the appellant to BPS-9 from 01-02-2016.
- VI. That there is no hurdle in the acceptance of the present appeal.
- VII. That this honorable tribunal is competent and has ample power to adjudge the matter under appeal.
- VIII. That any other ground not specifically raised will be argued with prior permission of this August Court.

It is therefore very humbly prayed that, on acceptance of this appeal the act, omission and denial of respondents to provide promotion to the appellant be declared illegal, unlawful, unconstitutional and void and respondents may kindly be directed to include the name of the appellant in seniority list and provide promotion to the appellant from 01-02-2016.

Any other relief which is otherwise deem fit lawful, efficacious may also be granted in favor of appellant.

  
APPELLANT

Muhammad Rahman

Through Counsel

  
Bahre Karam Advocate

High Court

District Shangla Courts

Cell: 03454612812

(4)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. \_\_\_\_\_/2024

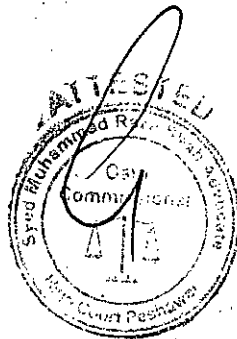
Muhammad Rahman ..... (Appellant)

**VERSUS**

Secretary Higher Education Department & others..... (Respondents)

**AFFIDAVIT**

I, Muhammad Rahman S/O Amroz Khan Resident of Faiz Abad Alpurai, Tehsil Alpuri, District Shangla, do hereby solemnly affirm and declare on oath that all the contents of the above titled appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.



*M.A. Rahman*

Deponent  
Muhammad Rahman  
CNIC No: 15501-6325267-9

26 JUN 2024



(5)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. \_\_\_\_\_/2024

Muhammad Rahman ..... (Appellant)

**VERSUS**

Secretary Higher Education Department & others ..... (Respondents)

**ADDRESSES OF PARTIES**

**APPELLANT**

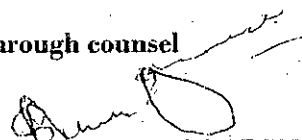
Muhammad Rehman S/o Amroz Khan (Laboratory Assistant at Government Degree college Alpurai Shangla)  
R/O Faiz Abad Tehsil Al Purai District Shangla

**RESPONDENTS**

1. Secretary Higher Education Department Government of Kyber Pakhtunkhwa, Peshawar
2. Director Higher Education Department, Khyber Pakhtunkhwa Directorate at Peshawar.

  
**APPELLANT**

Through counsel

  
**BAHRE KARAM ADVOCATE**  
High Court.  
District Shangla Courts Shangla.  
Cell : 03454612812.

(6)

Annex (A)

DIRECTORATE OF EDUCATION,  
(COLLEGES) NWFP, PESHAWAR

Dated Pesh: the 6-12-1994.

APPOINTMENT ORDER.

Selection

Consequent upon their selection by the Departmental/ O committee as a result of Interview/Test held at Govt College Peshawar and City Govt Girls College Peshawar on 20/10/1994, the following candidates are hereby appointed as Laboratory Assistant in WFO-07(100-01-2005) plus usual allowances against vacant posts in the Colleges noted against their names with effect from the dates of their taking over charges on the following terms and conditions.

S.No.	Name, Parentage & Address	Posted at	Remarks.
01	Achar Mahmood S/O Zardad Khan Village Dohark Faizir Sahib cum Noordi Tehs & Distt: Haripur.	Govt College Haripur.	vice Khalid Mahmood selected teacher & relieved.
2.	Muhammad Javed S/O Abdul Ghani, H/No. 324 K.T.S Sector No. 4 / District Haripur.	GC, Haripur	vice Muhsin Naveer has relieved.
3.	Muhammad Rehman S/O Imroz Khan Resident Alpuri Distt: Swat.	GC Chakassar	Against v/post.
4.	Mrs. Majida Begum D/O Muhammad- Younas Khan C/O Abid Zaman junior clerk GPOC, Abbottabad.	Govt Girls College Abbottabad.	vice Mizaffar Hussain transfe- rred.

TERMS AND CONDITIONS.

1. Their appointments is purely on temporary basis and are liable to termination at any time without notice till they complete their probation of two years or extended period.
2. In case any one wish to resign from service he will have to serve the department with one months prior notice of forfeit one months' pay in lieu thereof.
3. They will be governed by the rules in force or issued by the Government from time to time.
4. They will be required to produce health and age certificate from the medical Superintendent concerned before drawal of first pay.
5. The verification roll of Character and antecedent should be obtained on prescribed form from them and submitted to this office.
6. No TA/DA is allowed to any one.
7. Charge reports should be submitted to all concerned.
8. The appointment of the person who failed to resume duty within 15 days will be considered as cancelled.

Encls: No. 1-167/ Apptt./ L. Asstt./ CVII

35055-65

dated 6/12/94.

Copy forwarded to the-  
Principals of Govt Colleges (W) concerned.  
Distt: Accounts Officer concerned.

(Prof: Muhammad Eqbal).  
Dy: Director of Education (Colleges)  
NWFP, Peshawar.

Dy: Director of Education (Colleges) NWFP  
Peshawar.

(7) 1 Annexure (B)



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

Khyber Pakhtunkhwa  
Service Tribunal

Service Appeal No. 595/2019

Diary No. 723

Dated 2/5/20

Muhammad Rehman S/o Amroz Khan (Ex-  
Laboratory Assistant at Government Degree college  
Agra Malakand) R/o Faiz Abad Tehsil Al Puri District  
Shangla ..... **Appellant**

**VERSUS**

1. Secretary Higher Education Department Government  
of Khyber Pakhtunkhwa, Peshawar
2. Director Higher Education Department, Khyber  
Pakhtunkhwa Directorate at Peshawar.

..... **Respondents**

**APPEAL U/S 4 OF KHYBER  
PAKHTUNKHWA SERVICE TRIBUNAL ACT,  
1974, AGAINST THE ORDER DATED  
19/12/2018 OF RESPONDENT NO. 2 VIDE  
WHICH THE SERVICES OF THE  
APPELLANT WAS TERMINATED,  
REMOVED WITH FURTHER ORDER OF  
RECOVERY OF RS. 4168355/-.**

Filed to-day

Registrar

8/5/19

Prayer:-

*On acceptance of the appeal, the impugned  
office order dated 19/12/2018 whereof by  
imposing major penalty to the appellant,  
his services was removed with order of*

**ATTESTED**

**EXAMINER**  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

(8)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 595/2019

Date of Institution ... 08.05.2019  
Date of Decision ... 06.07.2021



Muhammad Rehman S/o Amroz Khan (Ex-Laboratory Assistant at Government Degree College, Agra Malakand) R/o Faiz Abad Tehsil al Puri District Shangla.  
... (Appellant)

VERSUS

Secretary, Higher Education Department to Government of Khyber Pakhtunkhwa, Peshawar and one other. ... (Respondents)

APPELLANT ... In Person

MUHAMMAD RIAZ AHMED PAINDAKHEIL  
Assistant Advocate General ... For Respondents

MR. SALAH-U-DIN ... MEMBER (JUDICIAL)  
MR. ATIQ UR REHMAN WAZIR ... MEMBER (EXECUTIVE)

**JUDGMENT**

**Mr. ATIQ UR REHMAN WAZIR MEMBER (E):-** Brief facts of the case

are that the appellant, while serving as Laboratory Assistant in a Government Degree College was proceeded against on the charges of embezzlement and absence, who ultimately was removed from service vide order dated 03-08-2016. Feeling aggrieved, the appellant filed Service Appeal No. 1230/2015 in this tribunal which was decided on 08-03-2018, re-instating the appellant with directions to the respondents to conduct de-novo proceedings within a period of 120 days. Since the respondents failed to complete the proceedings within the stipulated time period, hence the appellant filed Execution Petition No. 234/2018,

**ATTESTED**


**EXAMINER**  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

which reached its logical conclusion, when, as a result of de-novo proceedings, major penalty of removal from service along with recovery of Rupees 41,68,355/ was imposed upon the appellant, against which appellant filed departmental appeal dated 26-12-2018, which was not responded to within the statutory period, hence the instant service appeal with prayers that the impugned order dated 19-12-2018 may be set aside and the appellant may be re-instated in service with all back benefits..

02. Written reply/comments were submitted by respondents.

03. Arguments heard and record perused.

04. The appellant Pro se argued the case and has contended that respondents deliberately delayed the de-novo proceedings, which compelled the appellant to file execution petition before this Tribunal with prayers that neither re-instatement order was issued in his favor nor he was provided opportunity to participate in the de-novo proceedings; that it was due to filing of the execution petition that the respondents issued his re-instatement order in back date, copy of which was not delivered to him; that the whole de-novo proceedings were undertaken secretly and at his back and he was never informed of such proceedings; that the whole disciplinary proceedings are fake, factitious and are engineered, as neither he was issued any charge sheet/statement of allegation, nor any show cause notice was served upon the appellant. Needless to mention of the personal hearing and opportunity of cross-examination. The appellant argued that the respondents failed to produce a single piece of evidence to show that any correspondence was made by the respondents with the appellant with regard to de-novo proceedings. The appellant added that since the proceedings were not completed within stipulated timeframe, hence such proceedings after expiry of said prescribed period of four months, were void, non-existent and of no


**ATTESTED**  
  
**EXAMINER**  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

(10)  
3

legal value; that actions of the respondents are based on malafide and the appellant was not treated in accordance with law; that fake record is being generated by two employees of the College namely Mr. Bashir Khan, Deputy Director (Establishment) and Muhammad Iftikhar, Deputy Director (Academic), having personal grudge with the appellant; that such fraudulent act is evident from the fact that no date is affixed on any of the documents, which are purported to be genuine; that such documents were made factitiously only for submission in this Tribunal and no document whatsoever, has been handed over to the appellant nor sent to the appellant via registered mail; that the appellant has already submitted an application to this Tribunal to summon the above mentioned two officials and to take punitive action against them for their fraudulent actions and submission of fake documents in this Court; that these two individuals having personal grudge with the appellant are trying their best to keep him away from his job. The appellant prayed that action of the respondents and particularly the two officials mentioned above are based on malafide and the appellant was not treated in accordance with law and the impugned order having no value in the eyes of law, may be set aside, the appellant may be re-instated in service with all back benefits and recovery of the amount may be set at naught.

05. Learned Assistant Advocate General appearing on behalf of respondents has contended that in pursuance of judgment dated 08-03-2018 of this Tribunal, the appellant was re-instated in service vide order dated 11-05-2018 and an inquiry committee was constituted. Learned Assistant Advocate General contended that the inquiry committee tried its level best to contact the appellant via telephone contact/SMS, but the appellant did not turn up. Learned Assistant Advocate General further contended that the competent authority prepared proper charge sheet/statement of allegation to be served upon the appellant, but the appellant never joined the de-novo proceedings, thus the

**ATTESTED**

  
**EXAMINER**  
Syed Farhat ul Nadeem  
Service Tribunal  
Islamabad

11/11

accused in this case. It is worth to mention that since the inquiry committee was under obligation due to judgment of this Tribunal to probe into the issue of embezzlement in respect of the appellant, hence the committee was required to investigate the issue on scientific lines, as alleged impersonated signature of the appellant can only be verified by Forensic Science Laboratory which however was not done by the inquiry committee. The respondents also failed to establish as to how the appellant being a Laboratory Assistant was entrusted with the job of Account Clerk. We did not find any order in written to show that such responsibility was assigned to the appellant. Needless to mention that the appellant was neither drawing & disbursing officer, nor was supposed to perform duty as an account clerk. It was also noted that recoveries have been affected from Ex-Principals of the college, who were actually drawing & disbursing officers and mainly responsible for monetary disbursement, hence making the appellant solely responsible for embezzlement and making recoveries from the Ex-DDOs are contradictory and which have made the whole proceedings dubious.

07. Presumably, if stance of the inquiry officer is acknowledged that the appellant after re-instatement remained absent and did not participate in the de-novo proceedings, in that case, the respondent were required to initiate proceedings against the appellant under Rule 9 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, but which was not done and the respondents continued its proceedings under Rule 11 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, and after submission of the inquiry report to the competent authority, the competent authority skipped rule 14(4) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, and directly issued his removal from service order. Record also reveals that an FIR dated 08-09-2011 was also registered against the appellant in Police Station Anti-corruption establishment, which is still

ATTACHED

EXAMINER  
Khyber Pakhtunkhwa  
Tribunal  
Peshawar


pending adjudication. It was also noted that the respondents submitted piecemeal documents from time to time to this Tribunal and to this effect, show cause notice undated in respect of the appellant, which was not submitted with the implementation report in execution petition, was submitted at a very belated stage, which strengthen the contention of the appellant, that the respondents prepare fake orders and submit to the Tribunal from time to time. The question of recovery of embezzled amount was thoroughly examined, but the inquiry report substantiated its stance with findings of the previous inquiries and did not offer a solid evidence to this effect.

08. Stance of the appellant, on the other hand is also worth consideration, as if the respondents had issued his re-instatement order well within time and if he was proceeded against within the statutory period, he would have not filed execution petition before this Tribunal after expiry of the statutory period. It is crystal clear that copies of such proceedings were presented before this Court after lapse of almost one year.

09. In view of the foregoing, we are of the considered opinion that the appellant was proceeded against twice, but was not treated in accordance with law. We smacks malafide on part of the respondents to the effect that the appellant was kept ignorant of the de-novo proceedings so much so that his re-instatement order for the purpose of de-novo inquiry was presented to this Tribunal with delay of nine month after expiry of the timeframe fixed for de-novo proceedings. The proceedings so conducted are replete with deficiencies having no value in the eyes of law and are liable to be struck down.

10. In the light of the above discussion, the instant appeal is accepted and the appellant is re-instated in service with all back benefits. The respondents shall, however be at liberty to conduct de-novo inquiry into the matter regarding

**ATTESTED**

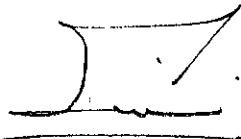
  
**EXAMINER**  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar



(16)

the alleged embezzlement, if they so desires. Parties are left to bear their own costs. File be consigned to record room.

**ANNOUNCED**  
**06.07.2021**

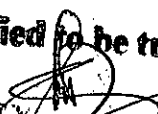


(SALAH-U-DIN)  
MEMBER (JUDICIAL)



(ATIQ UR REHMAN WAZIR)  
MEMBER (EXECUTIVE)

**Certified to be true copy**

  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

Date of Presentation of Application 13-7-2021  
Number of Words 4500  
Copying Fee 42.00  
Urgent ✓  
Total 42.00  
Name of Copyist \_\_\_\_\_  
Date of Completion of Copy 14/07/21  
Date of Delivery of Copy 14/07/21



**DIRECTORATE OF HIGHER EDUCATION**  
**KHYBER PAKHTUNKHWA**  
**RANO GHARI NEAR CHAMKANI MOR, PESHAWAR**

E-mail:- [dhekpkes@gmail.com](mailto:dhekpkes@gmail.com) Facebook.com/dhekpkes Peshawar Twitter.com/dhekpkes Peshawar1

Dated Peshawar the 30 / 12 /2021

**OFFICE ORDER:**

In pursuance of the judgment passed by Khyber Pakhtunkhwa, Service Tribunal, Peshawar on 06-07-2021 in Service Appeal No. 595/2019, the Competent Authority is pleased to reinstate the services of Muhammad Rahman, Lab Assistant with all back benefits, and post him against the vacant post at Govt: Degree College, Khwaza Khela (Swat) with immediate effect.

**DIRECTOR HIGHER EDUCATION**

Endst. No 3/357-63/CA-VII/Estt: Branch/A-167/GDC Agra

Copy of the above is forwarded for information and necessary action to the:-

1. Registrar, Khyber Pakhtunkhwa, Service Tribunal. Peshawar.
2. Principal, Govt: Degree College, Agra (Malakand).
3. Principal, Govt: Degree College, Khwaza Khela (Swat).
4. District Account Officer, Malakand.
5. District Account Officer, Swat.
6. PA to Director, Higher Education Khyber Pakhtunkhwa Peshawar.
7. Official concerned.

Attested

(Khawaja M. Saqib)  
**ASSISTANT DIRECTOR (GENERAL)**



(18)

**DIRECTORATE OF HIGHER EDUCATION  
KHYBER PAKHTUNKHWA  
RANO GHARI NEAR CHAMKANI MOR, PESHAWAR**



E-mail:- [dhekpkesh@gmail.com](mailto:dhekpkesh@gmail.com) Facebook.com/dhekpkeshwar Twitter.com/dhekpkeshwar1

Dated Peshawar the 13/12/2023

**OFFICE ORDER:**

In Pursuance of the direction in the judgement of the Honorable Service Tribunal, Peshawar on dated 06-07-2021 in Service Appeal No. 595/2019, and subsequent execution petition No. 692/2023, the Competent Authority (Director, Higher Education) has been pleased to adjust Muhammad Rehman, Lab Assistant at the stations mentioned below for the drawl of back benefits please.

S.No#	College/Station	Tenure/Period	Remarks
1	Government Degree College Agra, Malakand	01-01-2011 to 30-06-2017	AVP
2	Government Degree College Khwaza Khela, Swat	01-07-2017 to 31-08-2021	AVP

DIRECTOR, HIGHER EDUCATION

Endst: No 22169-24/CA-VII/Estb: Section/GDC Agra, Malakand M-154(V-01)

Copy of the above is forwarded to the:-

1. Principal, Govt: Degree College Agra, Malakand.
2. Principal, Govt: Degree College Khwaza Khela, Swat.
3. District Account Officer, Malakand.
4. District Account Officer, Swat.
5. Official concerned.

Attested  
Bmt

13-12-23  
ASSISTANT DIRECTOR (ESTT:)



(19) Amendment (D)  
**DIRECTORATE OF HIGHER EDUCATION  
KHYBER PAKHTUNKHWA,  
KHYBER ROAD PESHAWAR**

Phone # 091-9210242, 9211025/Fax # 921021  
No. 312759/CA-VII/Estt: Branch/A-167/Lab: Assistant File.

Dated Peshawar the 11/2/2014

To

All JMCs/ Principals  
Govt; Colleges (Male & Female)  
in Khyber Pakhtunkhwa.

SUBJECT  
Memo:

TENTATIVE SENIORITY LIST OF LAB ASSISTANT.

I am directed to enclose herewith the above list for distribution amongst in all Colleges (Male & Female) in your respective jurisdiction for lodging appeal/ any objections within one month of the issue of this letter positively.

  
DY: DIRECTOR (ESTABLISHMENT)

Endst; No.

Copy of the above is forwarded to the:-

1. Section Officer (Colleges-II) Govt; of Khyber Pakhtunkhwa, Higher Education Department Peshawar.
2. PA to Director Higher Education Khyber Pakhtunkhwa.
3. Superintendent Promotion Cell, local Directorate.

  
DY: DIRECTOR (ESTABLISHMENT)

Attested



Provisional Seniority List of Lab Assitants Directorate of Higher Education KPK Peshawar

S.No	Name	Father Name	Qualification	College	D.O.B	Domicile	Date of 1st Entry in Govt Service	Date of Appointment as Lab Assistant	Date of Retirement
1	Malik Jehangir Khan	Malik Daud Khan	B.A	GPGC Haripur	05/04/1954	Haripur	03/12/1974	03/12/1974	
2	Muhammad Rashid	Mir Zaman	M.A	GPGC No.1 Abbottabad	04/04/1958	Abbottabad	20/05/1976	20/05/1976	
3	Shah Jahan	Gul Azam	B.A	GDC Isa Khel Lakki	15/03/1958	Lakki Marwat	01/05/1977	01/05/1977	
4	Hafiz Saeed Jan	Muhammad Nazir	M.A	GPGC Charsadda	25/03/1957	Charsadda	01/08/1977	01/08/1977	
5	Rafiqullah	Sarzamin	B.A	GPGC Jahanzeb College Saidu Sharif Swat	01/04/1959	Swat	15/12/1977	15/12/1977	
6	Amin Shah	Mubariq Shah	Matric	GPGC Kohat	07/03/1955	Kohat	16/01/1978	16/01/1978	
7	Mushtaq Ahmed	Muhammad Usman	Matric	GPGC Charsadda	13/03/1956	Charsadda	19/06/1978	19/06/1978	
8	S. Iftikhar Hussain		Matric	GDC No.1 D.I.Khan	4/15/1997	D.I.Khan	03/01/1979	03/01/1979	
9	Umar Rashid	Gandarai	F.A	GPGC Jahanzeb College Swat	30/04/1961	Swat	01/04/1979	01/04/1979	
10	Ghulam Ghous Khan	Ghulam Sarwar Khan	B.A	GPGC Mansehra	06/03/1956		10/04/1979	10/04/1979	
11	Momin Khan	Taj Muhammad	M.A	Govt Superior Science College Peshawar	13/01/1956	Peshawar	21/06/1979	21/06/1979	
12	Muhammad Asif	Ghulam Rasool	M.A	GC Peshawar	21/12/1957	Peshawar	20/11/1979	20/11/1979	
13	Muhammad Iqbal	Sher Muhammad	M.A	GPGC Mardan	08/09/1961	Mardan	01/11/1979	01/03/1980	
14	Abdul Baseer	Rehman Gul	Matric	GC Peshawar	03/02/1961	Charsadda	20/03/1980	20/03/1980	
15	Shamshad	Musafar	B.A	GC Dagar Buner	10/01/1954	Buner	01/11/1971	01/04/1980	
16	Abd ur Rehman	Maula dad Khan	Matric	GDC Ghazni Khel Lakki Marwat	20/01/1958	Lakki Marwat	10/05/1980	10/05/1980	
17	Arif Hussain	Abdul Qayyum	F.A	GPGC No.1 Abbottabad	15/03/1958	Abbottabad	09/07/1980	09/07/1980	
18	Alifullah	Rafiqullah	F.A	GPGC Charsadda	06/10/1964	Charsadda	23/08/1980	23/08/1980	
19	Fayyaz Ahmed	Khani mullah	F.Sc	Govt Superior Science College Peshawar	04/01/1959	Peshawar	08/09/1980	08/09/1980	
20	Muhammad	Redi Gul	B.A	GPGC Dargai Malakand	01/09/1956	Malakand	02/10/1980	02/10/1980	
21	Muhammad Ayub	Sargand Khan	M.A	GPGC Timergara Dir Lower	01/05/1961	Dir Lower	02/03/1981	02/03/1981	
22	Khurshid Alam	Bakhtiar Khan	B.A	GDC Thana Malakand	14/10/1953	Malakand	01/05/1981	21/04/1981	
23	Shakirullah	Jan Pacha	Matric	GDC Dir Distt: Dir Upper	17/06/1959	Dir Upper	01/05/1981	01/05/1981	
24	Tufaiq Zaman	Azmat Khan	Matric	GDC Khola Swabi	11/04/1963	Swabi	01/09/1981	01/09/1981	
25	Habibullah	Rahmatullah	F.A	GC Dagar Buner	01/05/1959	Buner	15/09/1980	01/09/1981	
26	Atta ur Rehman	Abdul Sattar	M.A	GDC Oghi Mansehra	14/01/1957	Mansehra	01/09/1981	01/09/1981	
27	Shahid Badshah	Ali Said	B.A	GDC No. 2 Mardan	15/01/1957		15/09/1981	15/09/1981	
28	Muhammad Shah	Muhammad Shah	Matric	GPGC Dargai Malakand	01/10/1956	Malakand	15/09/1981	15/09/1981	
29	Muhammad Pervez	Abdul Mannan	M.A	Govt Superior Science College Peshawar	08/03/1964	Peshawar	17/09/1981	17/09/1981	
30	Zia ullah	Fazli Wahab	MBA	GDC Thana Malakand	10/04/1961	Malakand	26/09/1981	26/09/1981	
31	Muhammad Ilyas Khan	Muhammad Zareef Khan	F.A	GPGC Haripur	15/02/1962	Haripur	01/12/1981	01/12/1981	
32	Abdul Jabbar Shah	Zarghun Shah	M.A	GDC Ghazni Khel Lakki Marwat	12/12/1959	Lakki Marwat	01/03/1982	01/03/1982	

Provisional Seniority List of Lab Assitants Directorate of Higher Education KPK Peshawar

S.No	Name	Father Name	Qualification	College	D.O.B	Domicile	Date of 1st Entry in Govt Service	Date of Appointment as lab Assistant	Date of Retirement
193	Mah uliah Khan	Haji Behram Khan	B.Sc	GDC Serai Naurang Lakki Marwat	05/01/1970	Lakki Marwat	29/05/1993	29/05/1993	
194	Anayat ur Rehman		B.Sc	Govt ANK(s) DC KTS, Haripur	09/10/1969	Haripur	26/07/1993	26/07/1993	
195	Abid Hussain Shah	Syed Ghazi Shah	M.A	GPGC Mandian Abbottabad	12/05/1972	Abbottabad	01/08/1993	01/08/1993	
196	Nazir Ahmed	Abdul Muhammad	F.A	GDC Thana Malakand	04/01/1961	Malakand	27/10/1981	03/09/1993	
197	Ishfaq Hussain	Ghulam Hussain	F.Sc	Govt Superior Science College Peshawar	23/12/1974	Peshawar	14/05/1994	14/05/1994	
198	Inamullah Khan	Motabar Khan	F.A	GC Peshawar	15/10/1972	Peshawar	16/05/1994	16/05/1994	
199	Ahad Jan	Ahmed Jan	Matric	GDC Shabqader	04/01/1972	Charsadda	08/11/1994	08/11/1994	
200	Abdul Malik	Shah Jehaar	M.A	GPGC Swabi	28/03/1968	Swabi	08/11/1994	08/11/1994	
201	Waqeel Khan	Faqir Muhammad	B.A	GDC Thall	25/04/1964	Hangu	08/11/1994	08/11/1994	
202	Syed Mehboob Shah		Matric	GDC Chakesar Distt Shangla	10/04/1969	Shangla	12/11/1994	12/11/1994	
203	Hafeez ur Rehman	Muhammad Bashir	M.Sc	GPGC Mansehra	02/02/1973		13/11/1994	13/11/1994	
204	Ijaz Ahmed		B.Sc	GDC Chakesar Distt Shangla	10/02/1967	Shangla	16/11/1994	16/11/1994	
205	Muhammad Javed	Abdul Ghani	M.A	GPGC Haripur	01/01/1969	Haripur	06/12/1994	06/12/1994	
206	Iftikhar Khan	Mumtaz Khan	F.A	GPGC Timergara Dir Lower	02/01/1971	Dir Lower	20/12/1994	20/12/1994	
207	Muhammad Amir	Abdul Sattar	F.A	GPGC Kohat	10/09/1975	Kohat	01/01/1995	01/01/1995	
208	Muhammad Anifullah	Haji Muhammad Usman	F.A	GDC Paharpur (D.I.Khan)	4/20/1971	D.I.Khan	01/01/1995	01/01/1995	
209	Israr Ahmed	Ghulam Muhammad	B.Sc	GPGC Charsadda	10/11/1974	Charsadda	26/01/1995	26/01/1995	
210	Sifat ullah	Malik Abdullah	B.A	GDC Pabbi	01/03/1971	Nowshera	12/02/1995	12/02/1995	
211	Riaz ud Din	Ilhaam ud Din	B.A	GC Peshawar	06/03/1970	Charsadda	06/03/1995	06/03/1995	
212	Arshad	Muhammad Ashraf	B.A	GPGC No.1 Abbottabad	10/02/1976	Abbottabad	04/04/1995	04/04/1995	
213	Inamullah Khan		M.A	GDC Puran Shangla	14/08/1967	Shangla	03/05/1995	03/05/1995	
214	Akbar Hussain		Matric	GDC Puran Shangla	15/06/1970	Shangla	04/05/1995	04/05/1995	
215	Bakht biland		Matric	GDC Puran Shangla	01/02/1972	Shangla	04/05/1995	04/05/1995	
216	Asim Iqbal		Matric	GDC No.1 D.I.Khan	09/09/1972	D.I.Khan	11/06/1995	11/06/1995	
217	Muhammad Ayaz	Abdul rab	Matric	GDC Pattan Kohistan	03/04/1974	Kohistan	14/12/1995	14/12/1995	
218	Zafria Khan	Said Rehman	Matric	GDC Mathra	05/08/1967	Peshawar	17/02/1996	17/02/1996	
219	Muhammad Zubair	Mirdad	F.Sc	GPGC No.1 Abbottabad	12/01/1971	Abbottabad	11/06/1995	11/06/1995	
220	Muhammad Iqbal	Syed Bilal	M.A	GC Peshawar	04/11/1977	Charsadda	16/03/1996	16/03/1996	
221	Jawad Badshah	Lal Badshah	B.A	GDC Khair Abad Mardan	10/06/1971	Mardan	02/04/1996	02/04/1996	
222	Usmanullah	Shakirullah	M.A	GDC Bakhshshi Mardan	01/01/1970	Mardan	02/04/1996	02/04/1996	
223	Almal Khan	Habib ur Rehman	F.A	GDC Bakhshshi Mardan	13/03/1973		02/04/1996	02/04/1996	
224	Syed Mazhar Jalal	Syed Amir Jalal	F.A	GDC Bakhshshi Mardan	30/04/1977		02/04/1996	02/04/1996	

Handwritten signature and date: 17/03/2024



Provisional Seniority List of Lab Assitants Directorate of Higher Education KPK Peshawar

No	Name	Father Name	Qualification	College	D.O.B	Domestic	Date of Ist. Entry in Govt Service	Date of Appointment in Establishment	Date of Retirement
185	Faizan Afzal	Syed A. J.	B.A	GDC Barakot	1/8/1992	Domestic	1/1/2012	1/1/2012	
186	Junaid Hussain	Chaudhry S. A.	F.Sc	GDC Barakot	6/25/1992	Domestic	1/1/2012	1/1/2012	
187	Syed Ghous-ur-Rahman	Zahid Hussain S. A.	F.Sc	GDC Hayat Abad	2/4/1992	Domestic	1/1/2012	1/1/2012	
188	Rubina Arafat	S. A. S. A.	M.Sc	GDC Hayat Abad	2/4/1988	Domestic	1/1/2012	1/1/2012	
189	Shahid Kaveez	S. A. S. A. S. A. S. A.	B.A	GDC Shabqdeer	5/10/1987	Domestic	1/1/2012	1/1/2012	
190	Muhammad Tariq	Muhammad Tariq	B.A	GDC Tardra	1/6/1989	Domestic	1/1/2012	1/1/2012	
191	Muhammad Iqbal	Muhammad Iqbal	F.Sc	GDC Mardan	11/12/1992	Domestic	1/1/2012	1/1/2012	
192	Shah Gul	S. A. S. A.	F.Sc	GDC Toltakan Malkand	4/12/1993	Domestic	1/1/2012	1/1/2012	
193	Muhammad Khan	S. A. S. A.	B.A	GDC Toltakan Malkand	3/25/1991	Domestic	1/1/2012	1/1/2012	
194	Arif Khan	S. A. S. A.	B.A	GDC Toltakan Malkand	3/4/1987	Domestic	1/1/2012	1/1/2012	
195	Raveed Ahmad	S. A. S. A.	M.A	GDC Tardra	3/1/1980	Domestic	1/1/2012	1/1/2012	
196	Asmatullah	S. A. S. A.	B.Sc	GDC Tardra	1/1/1980	Domestic	1/1/2012	1/1/2012	

22

DEPUTY DIRECTOR (Establishment)  
HIGHER EDUCATION, KHYBER PAKHTUNKHWA

Handwritten notes: 2013, 2013, 2013

Attestes  
Handwritten signature

Handwritten notes: 2013, 2013



(93) Anamurdu (E)  
**DIRECTORATE OF HIGHER EDUCATION  
KHYBER PAKHTUNKHWA,  
KHYBER ROAD PESHAWAR**

Phone # 091-9210242, 9211025/Fax # 9210215

Dated Peshawar the 1/2/2016

**OFFICE ORDER**

Consequent upon the recommendation of the Departmental Promotion committee, the Competent Authority has been pleased to promote the following Lab. Assistants (B-07) to the Post of Senior Lab. Assistant (B-09) on regular basis of college cadre of Higher Education Department with immediate effect, and to post them in the college noted against each.

S.No	Name & Designation	Adjusted At	Remarks
1.	Muhammad Hazir, Lab Assistant, GPGC, Nowshera.	GPGC, Nowshera.	AVP
2.	Abdul Wali Khan, Lab Assistant, GDC, Badaber(Peshawar).	GDC, Badaber.	AVP
3.	Waheed Ahmed, Lab Assistant, GSSC, Peshawar.	GSSC, Peshawar.	AVP
4.	Abdul Ghafoor, Lab Assistant, GDC, Jawar (Buner).	GDC, Jawar (Buner)	AVP
5.	Syed Mohran Shah, Lab Assistant, GDC, Chamla (Buner).	GDC, Chamla (Buner)	AVP
6.	Hashmat Ali, Lab Assistant, GDC, Hangu.	GDC, Hangu.	AVP
7.	Wahid/Mehmood, Lab Assistant, KDA, Kohat.	KDA, Kohat	AVP
8.	Razaullah Khan, Lab Assistant, GDC, Paharpur (D.I.Khan)	GDC, Paharpur (D.I.Khan)	AVP
9.	Muhammad Ashraf, Lab Assistant, GDC, Paharpur.	GDC, Paharpur.	AVP
10.	Ghulam Bahoo, Lab Assistant, GDC, Paharpur (D.I.Khan)	GDC, Paravo(D.I.Khan).	AVP
11.	Riaz Ahmed, Lab Assistant, GDC, Akorra Khattak.	GDC, Akorra Khattak.	AVP
12.	Abdul Akbar, Lab Assistant, Govt. College Peshawar.	Govt. College Peshawar.	AVP
13.	Hidayat Khan, Lab Assistant, GDC, Lachi(Kohat).	GDC, Lachi(Kohat).	AVP
14.	Syed Agha Hussain Shah, Lab Assistant, GDC No.2, D.I.Khan.	GDC, No.2 D.I.Khan	AVP
15.	Attaullah, Lab Assistant, GPGC, Swabi.	GPGC, Swabi	AVP
16.	Sharif Nawaz, Lab Assistant, GPGC, Nowshera.	GPGC, Nowshera	AVP
17.	Ghulam Akbar, Lab Assistant, GDC, Tajori (Lakki Marwat).	GDC, Tajori(Lakki Marwat).	AVP
18.	Muhammad Sabir, Lab Assistant, GDC, Khair Abad (Mardan).	GDC, Khair Abad (Mardan).	AVP
19.	Amal Khan, Lab Assistant, GPGC, Matta (Swat).	Matta (Swat).	AVP
20.	Javed Iqbal, Lab Assistant, GPGC, Matta (Swat).	Matta (Swat).	AVP
21.	Nizam ud Din, Lab Assistant, GDC, Chitral.	GDC, Chitral.	AVP
22.	Abdul Akbar, Lab Assistant, GPGC, Swabi.	GPGC, Swabi.	AVP
23.	Hassan Khan, Lab Assistant, Khar Jajour.	GDC, Chagarmatti(Pesh).	AVP

ACCEPTED  
B.M.S.



(24)

89.	Abdullah Khan, Lab Assistant, GDC, Saria Naurang (Lakki Marwat)	GDC, Saria Naurang (Lakki Marwat)	AVP
90.	Abdul Qayyum, Lab. Assistant, GDC, Chitral	GDC, Dir.	AVP
91.	Nadeem, Lab. Assistant, GDC, K.T.S Hariur.	GDC, K.T.S Hariur.	AVP
92.	Sher Wali Badshah, Lab Assistant GPGC, Timergara.	GDC, Warl (Dir).	AVP
93.	Zia Ur Rehman, Lab. Assistant, GDC, Havelain.	GDC, Havelain.	AVP
94.	Farid Ur Rehman, Lab. Assistant, GPGC, Kohat.	GPGC, Kohat.	AVP
95.	Manzoor Iqbal, Lab. Assistant, GDC, Ahmad Abad.	GDC, B.D.Shah (Karak).	AVP
96.	Basir Ullah, Lab. Assistant, GDC, Ahmad Abad.	GDC, Latamber (Karak).	AVP
97.	Javed Akhtar, Lab. Assistant, GDC, Pattan	GDC, Pattan	AVP
98.	Munwar Shah, Lab. Assistant, GDC, Chitral	GDC, Palai(MKO Agency).	AVP
99.	Mohammad Ijaz, Lab. Assistant, GPGC, Kohat	GDC, Gumbat(Kohat).	AVP
100.	Mohammad Jawad, Lab. Assistant, GPGC, Mandian.	GDC, Ghazi(Haripur).	AVP
101.	Amir Saeed, Lab. Assistant, GPGC, Manshera.	GDC, Lissan Nawab (Mansehra).	AVP
102.	Khalid Umer, Lab. Assistant, GDC No.2, Mardan.	GDC No.2 Mardan	AVP
103.	Noor Dad, Lab. Assistant, GDC, Pattan (Kohistan).	GDC, Dassu.	AVP
104.	Matiullah Khan, Lab. Assistant, GDC, Sari Narurang.	GDC, Ghazni Khel (Lakki Marwat).	AVP
105.	Anayat-Ur-Rehman, Lab. Assistant, GDC, K.T.S Haripur.	GDC, Ghazi(Haripur).	AVP
106.	Abid Hussain Shah, Lab. Assistant, GPGC, Mandian.	GDC, Oghi (Mansehra).	AVP
107.	Ishtiaq Hussain, Lab. Assistant, GSSC, Peshawar.	GDC, Mathra (Peshawar).	AVP
108.	Inamullah, Lab. Assistant, GC, Peshawar.	GDC, Hayatabad (Peshawar).	AVP
109.	Muhammad Imran, Lab. Assistant, GDC, Dara Adam Khel.	GDC, Ghorl Wala(Bannu).	AVP
110.	Wakeel Khan, Lab. Assistant, GDC K.D.A, Kohat.	GDC, Gumbat(Kohat).	AVP
111.	Abdul Malik, Lab. Assistant, GPGC, Swabi.	GDC, Kotha(Swabi).	AVP
112.	Ahad Jan, Lab. Assistant, GDC, Shabqadar.	GDC, Naguman.	AVP
113.	Hafeez Ur Rehman, Lab. Assistant, GPGC, Manshera.	GDC, Dassu.	AVP
114.	Ijaz Ahmad, Lab. Assistant, GDC, Chakassar.	GDC, Chakassar	AVP
115.	Mohammad Javed, Lab. Assistant, GPGC, Haripur.	GDC, Khan Pur(Haripur).	AVP
116.	Ifikhar Khan, Lab. Assistant, GPGC, Timergara.	GDC, Samar Bagh (Dir).	AVP
117.	Mohammad Arif, Lab. Assistant, GDC, Parharpur.	GDC, Shah Essa Bilot Sharif(D.I.Khan).	AVP
118.	Mohammad Aamir, Lab. Assistant, GPGC, Kohat.	GPGC, Kohat.	AVP
119.	Israr Ahmad, Lab. Assistant, GPGC, Charsadda.	GPGC, Charsadda.	AVP
120.	Sifatullah, Lab. Assistant, GDC, Pabli.	GPGC, Nowshera.	AVP
121.	Arshad, Lab. Assistant, GPGC No 1, Abbottabad.	GPGC, No.1 Abbottabad.	AVP

(25)

160.	Bakht Munir, Lab.Assistant, GDC, Alpuri(Shangla).	GDC, Puran(Shangla).	V.S.No.123
161.	Muhammad Ramazan, Lab.Assistant, GDC, Kulachi(D.I.Khan).	GDC No.1, D.I.Khan.	V.S.No.126
162.	Gul Raiz, Lab.Assistant, GPGC, Nowshera.	GC, Peshawar.	AVP
163.	Zafar Ullah, Lab.Assistant, GDC, Takht Bhai(Mardan).	GDC, Khairabad (Mardan).	V.S.No.132
164.	Zahid Hussain, Lab.Assistant, GDC, Garhil Kapoora.	GDC, Bakhshali.	V.S.No.134
165.	Awais Muhammad, Lab.Assistant, GDC, Thall.	GDC, Takht-e-Nasrati (Karak).	V.S.No.82
166.	Inayatullah, Lab.Assistant, GDC, Thall(Hangu).	GPGC, Karak.	V.S.No.83
167.	Sajid Iqbal, Lab.Assistant, GPGC, Mandian(Abbottabad).	GDC, Ghazi(Haripur).	AVP
168.	Muhammad Ibrar, Lab.Assistant, GDC, Gulabad(Dir).	GPGC, Timergara.	AVP
169.	Shabir Ahmad, Lab.Assistant, GDC No.2, Mardan.	GDC, Akora Khattak.	AVP
170.	Arshad Iqbal, Lab.Assistant, GDC, Pabbi(Nowshera).	GSSC, Peshawar.	AVP

**Note:**

- i. Charge report should be submitted to all concerned.

**DIRECTOR HIGHER EDUCATION**

Endst.No. 2738-888

Copy of the above is forwarded for information and for necessary action to the.

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director Education FATA, Khyber Pakhtunkhwa, Peshawar.
3. All Principals concerned.
4. District/Agency Accounts officers concerned.
5. Officials concerned.

*M. Rashed*

**DY: DIRECTOR (ESTABLISHMENT)**

Attes GDS  
Bm

1) خدمت صائب سیکرٹری صاحب ہائر ایجوکیشن ضلع جتوئی خواہ لیٹاور

2) ڈائریکٹر صاحب ہائر ایجوکیشن ضلع جتوئی خواہ لیٹاور

عنوان: درخواست اپیل برائے پروموشن۔

صائب علی

خود بنا کر گزارش ہے کہ مسائل آپ حضور سے خدمت میں درج ذیل طرح رساں ہے۔

1) یہ کہ سائل 1994-95-98 سے لیٹاور ڈپٹی اسٹنٹ کے پوسٹ پر قائم کر دیا ہے۔

2) یہ کہ سائل کو 11 مئی میں قانون اور روز کے خلاف سروس سے ہر طرف کیا گیا تھا۔

3) یہ کہ سائل نے کمر سروس ٹریبونل ضلع جتوئی خواہ لیٹاور میں اپیل دائر کی تو سروس ٹریبونل ضلع جتوئی خواہ لیٹاور نے 21-07-06 کے سائل کو سابق تمام لیا جاتا ہے۔

4) یہ کہ سائل کو سروس ٹریبونل ضلع جتوئی خواہ لیٹاور کے حکم مورخہ 21-07-06 کے تحت ڈائریکٹر ہائر ایجوکیشن ضلع جتوئی خواہ لیٹاور نے ادھر مورخہ 21-07-06 پر سابق تمام لیا جاتا ہے ساتھ سروس ٹریبونل کر دیا ہے۔

5) یہ کہ سائل کی سروس سے ہر طرف کے دوران یعنی 21-07-06 سے 01-07-06 کے سائل کے ساتھ بھرتی ہونے والے 1994 سے لیٹاور ڈپٹی اسٹنٹ بلکہ سائل سے ہونے والے لیٹاور ڈپٹی اسٹنٹس کو بھی 01-07-06 کے پروموشن دیا گیا ہے۔

Attested  
B...

6) یہ کہ سائل کو سروس ٹریبونل ضلع جتوئی خواہ لیٹاور نے حکم مورخہ 21-07-06 کو سابق تمام لیا جاتا ہے ساتھ سروس ٹریبونل کر دیا ہے۔

7) یہ کہ سائل کو سروس ٹریبونل ضلع جتوئی خواہ لیٹاور کے حکم مورخہ 21-07-06 کے تحت ڈائریکٹر ہائر ایجوکیشن ضلع جتوئی خواہ لیٹاور نے ادھر مورخہ 21-07-06 پر سابق تمام لیا جاتا ہے۔

کے ساتھ سروس پر کمال کر رہا ہے۔ سائیل کو اجمع تک پروموشن  
 نہیں دیا گیا ہے۔  
 یہ کہ سائیل سروس ٹریبونل ضلع خٹوارہ لیٹاؤر کے حکم مورخ 06-07-06  
 کے تحت اور ڈائریکٹر بائراجوشن ضلع خٹوارہ لیٹاؤر کے  
 ادڈر مورخ 06-07-06 کے تحت 01-02-06 سے سائیل  
 کو پروموشن دینے کا استدعا کرتا ہے۔

لہذا :- سائیل آپ حضور کے ذمہ میں عرض کرتا ہے کہ آپ صاحبان  
 سروس ٹریبونل ضلع خٹوارہ لیٹاؤر کے حکم مورخ 06-07-06  
 اور ڈائریکٹر بائراجوشن ضلع خٹوارہ لیٹاؤر کے ادڈر  
 مورخ 06-07-06 کے تحت سائیل کو 01-02-06 سے  
 پروموشن دینے کا احکامات جاری کریں۔ تاکہ سروس  
 ٹریبونل ضلع خٹوارہ لیٹاؤر کے حکم مورخ 06-07-06  
 ہی تعمیل تکمیل ہو جائے۔ اور سابقہ قانون اور رولز  
 کی پاسداری قائم ہو جائے۔ تو سائیل آپ حضور  
 کیے صاحبان دعا کرتے ہیں۔

الحاضر

مدرسہ محمد امجد خان

لیٹریٹری اسٹنٹ گورنمنٹ

ڈگری کالج ایوری ضلع شانگلہ

جوبائیل منر  
 0345-5616667

02/03/2024

Attest

Bm

بار کونسل نمبر: B.C-193-387.7	27312
بار ایسوسی ایشن کا نمبر: A	پشاور ہائی کورٹ مینگورہ بینچ بار ایسوسی ایشن سوات
رابطہ نمبر: 03454612812	

Karamalp@gmail.com

پشاور ہائی کورٹ مینگورہ بینچ

منجانب: اسلام آباد	نوعیت مقدمہ
عنوان مقدمہ	علت نمبر:
	مورخہ:
	پر:
	تھانہ:

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

بہم کورٹ سوات کیلئے کس کر ح ریدر ایکٹ کو 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 بیان بر راضی  
 نامہ دینے و تقرر ثالث کرنے، دعوی جوائت دعوی، جواب الجواب، اقبال دعوائی، درخواست برائے سرسبزی مقدمہ، درخواست  
 منسوخی ڈگری یکطرفہ، جواب درخواست ہائے کا اختیار ہوگا۔ نیز دائر کرنے اپیل، مگرانی، رٹ پیشین، نظر ثانی و پیروی کرنے کا  
 اختیار ہوگا۔ اور مقدمہ مذکورہ کیلئے کل وقتی یا جزوی کارروائی کیلئے کسی دیگر وکیل یا مختار قانون کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
 ہوگا اور صاحب مقرر شدہ کو بھی جملہ مذکورہ اختیارات حاصل ہوں گے، اور اس کا ساختہ و پرداختہ کارروائی منظور و قبول ہوگا، بدوران  
 مقدمہ جو خرچہ و ہرجانہ کسی بھی سبب سے حاصل ہوگا، وہ وکیل موصوف وصول کرنے کا حقدار ہوگا، کوئی تاریخ پیشی مقام مذکورہ بالا  
 سے باہر ہو، تو وکیل صاحب پیروی مقدمہ کرنے کے پابند نہ ہوں گے، مقدمہ کی عدالت میں بعد پیروی خارج ہونے یا ڈگری  
 یکطرفہ ہونے کے صورت میں وکیل صاحب ذمہ دار نہیں ہوں گے۔

اسلام آباد تحریک انجمن راجہ امجد علی خان

لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

مقام کس کر ح سوات کے لئے منظور ہے۔

ایڈوکیٹ دستخط

الرقوم: 20/05/2024