


FORM OF ORDER SHEET

Court of _____

Appeal No. 908/2024


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/07/2024	<p>The appeal of Mr. Muhammad Ibrahim resubmitted today by Mr. Jehan Afsar Paindakhel Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on 22.07.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Muhammad Ibrahim received today i.e on 27.06.2024 is incomplete on the following score which is returned to the appellant for completion and resubmission within 15 days.


- 1- Memorandum of appeal is not signed by the appellant.
- 2- Annexures of the appeal are unattested.
- ③ Copy of departmental appeal against the impugned order 21.03.2024 is not attached with the appeal be placed on it.

No. 266 /Inst./2024/KPST,

Dt. 28/6 /2024.


28/6/24
OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Jehan Afsar Paindakhel Adv.
High Court Peshawar.

- ⇒ Respondent No. 3 has not been filed an appeal against the order dated 21³/₂₄.
- ⇒ Objections removed & re submitted on: 28-06-2024 

Respected Madam,

It is submitted that the present appeal was returned to counsel for the appellant for removing the deficiencies (Flag-A). Today i.e. 28.06.2024 the learned counsel re-filed the appeal without removing the objection no.2.

The appeal is now submitted to your honor under rules 7 (c) of the Khyber Pakhtunkhwa Service Tribunal rules 1974 for appropriate order please.

Hon'ble Member (J).


OFFICE ASSISTANT
1/7/24

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No: 908 of 2024

Muhammad Ibrahim, Senior CT, Govt. Higher Secondary School No. 2,
Haripur.

Appellant

VERSUS

Director, Elementary & Secondary Education & others

Respondents

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Through

Appellant



Jehan Afsaf Painsa Khel
Advocate High Court, Peshawar

Dated: 22/06/2024

①

**BEFORE KHYBER PAKHTUN KHWA, SERVICE TRIABUNAL,
PESHAWAR**

Service Appeal No. 908 /2024

Muhammad Ibrahim, Senior CT, Govt. Higher Secondary School No. 2,
Haripur.

Appellant

VERSUS

1. Director

Directorate of Elementary & Secondary Education, Peshawar.

2. District Education Officer (M), Haripur.

3. Aizaz Ahsan, CT, GHSS No. 2, Haripur.

Respondents

**SERVICE APPEAL UNDER SECTION-4 OF THE SERVICE
TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED TRANSFER
ORDER DATED: 12-03-2024 VIDE WHICH RESPONDENT No. 2
TRANSFERRED THE APPELLANT PREMATURELY AND
AGAINST THE ORDER DATED: 21-03-2024 VIDE WHICH
RESPONDENT No. 3 IS TRANSFERRED AGAINST THE POST OF
PETITIONER AND AGAINST THE INACTION OF RESPONDENT
No. 1, WHO FAILED TO DECIDE THE DEPARTMENTAL
APPEAL WITHIN STIPULATED TIME.**

PRAYER:-

**ON ACCEPTANCE OF THE INSTANT APPEAL THE IMPUGNED
TRANSFER ORDER OF THE RESPONDENTS NO. 2 DATED: 12-
03-2024 AND APPELLATE ORDER (IF ISSUED DURING
PENDENCY OF INSTANT SERVICE APPEAL) READ WITH
IMPUGNED ORDER DATED: 21-03-2024 TO THE EXTENT OF
RESPONDENT No. 3 MAY BE SET ASIDE AND THE APPELLANT**

**MAY KINDLY BE RETAINED ON HIS POSITION OF SENIOR CT,
GOVT. HIGHER SECONDARY SCHOOL No. 2, HARIPUR.**

Respectfully Sheweth:

FACTS:-

Facts leading to the institution of the instant appeal are as under:-

1. **That** the appellant was appointed in the respondent department on 10-01-1993 and since his appointment, he was performing his duties in far flung areas especially hilly areas of District Haripur.

2. **That** after working for almost 30 years in far flung areas, on 08-04-2023 appellant was adjusted from GHS Kachi to GHSS No. 2, Haripur and later on appellant was promoted from CT to Senior CT vide order dated: 26-06-2023.

{True Copy of transfer order dated: 08-04-2023 is attached, as mark Annex-A}

3. **That** appellant was working with great zeal and devotion and to the entire satisfaction of his superiors without any stigma or complaint.

4. **That** the appellant came to know about the impugned transfer order dated: 12-03-2024 vide which the appellant was transferred from Govt. Higher Secondary School No. 2, Haripur to GHS Badhora.

{True copy of impugned transfer order dated: 12-03-2024 is attached, as mark Annex-B}

5. **That** the appellant after issuance of the impugned transfer order, preferred his departmental appeal before the respondent No. 1 on 13-03-2024, but the said appeal was not decided within stipulated time period of 90 days.

{True Copy of departmental appeal is attached, as mark Annex-C}

6. **That** departmental appeal of appellant was waiting for its outcome, when respondent No. 2 issued another impugned order on 21-03-2024 vide which respondent No. 3 was transferred against the post of appellant.

{True copy of impugned transfer order dated: 21-03-2024 is attached, as mark Annex-D}

7. **That** the appellant being aggrieved from the impugned transfer order dated: 12-03-2024 & order dated: 21-03-2024 and appellate order (if his appeal is rejected which is not in knowledge of appellant), having no other adequate and efficacious remedy except the present service appeal.

GROUNDS:-

- A. Because the impugned order dated: 12-03-2024 and 21-03-2024 to the extent of respondent No. 3 issued by respondent No. 2 is against law, facts, hence liable to be set-aside.
- B. Because the respondent No. 2 in utter disregard to the principles of the fairness, merit and transparency passed the present impugned order dated: 12-03-2024, hence the impugned order of the respondent is against the law, illegal, unlawful and void ab initio and liable to be turned down.
- C. Because the impugned transfer of the appellant without adopting proper criteria and codal requirements by the respondents is against the worthy ruling of the Hon'ble Superior Courts of Pakistan and therefore, the same is illegal practice and such practice adversely effects efficiency of incumbents and also reduces their confidence and faith in public, hence the impugned order referred above is liable to be upheld on this score also.
- D. Because the appellant had been made victim of discrimination, demerits, partiality and favoritism without any just and reasonable cause thereby offending the fundamental rights of the appellant as provided by the constitution of 1973, hence the impugned orders detailed above are liable to be set at naught.
- E. Because appellant almost served the department for 30 years and during this entire period, he was posted at far flung and hilly areas of District Haripur.
- F. Because appellant is basically hails from Haripur City and after serving the department for 30 years, he finally adjusted in his home town but now without waiting for completion of normal tenure under the law / policy, he was again transferred to far flung area.
- G. Because appellant also portrayed a genuine cause for cancellation of his transfer order (premature transfer and illness of elder brother) but respondent No. 1 did not paid any attention to his genuine request, which is unwarranted.
- H. Because on one hand respondent No. 2 is transferring the appellant due to reason of shortage of staff while on the other hand, transferring respondent No. 3 to the post of appellant, so if they are facing shortage of staff then how they transferred respondent No. 3 to the post of appellant and that too being junior to appellant, as respondent No. 3 is CT BPS-15 while the post against which he is transferred is Sr. CT BPS-16 which is reflected from the impugned transfer order.

- I. Because the impugned transfer order is premature, as appellant was transferred to this school on 08-04-2023, so the tenure as given by service law, has not yet completed, hence the impugned order is bad in the eyes of law.
- J. Because the appellant was condemned unheard, his departmental appeal was not properly adjudicated in the manner as provided by the law. Further no chance of personal hearing was given to the present appellant in order to redress his grievances which shows the malafide of the Respondents, hence needs interference of this Hon'ble Tribunal.
- K. Because the present impugned order is illegal, illogical, against facts, without jurisdiction and suffering from material irregularity, hence they are untenable and liable to be struck down.
- L. Because the Respondents erroneously exercised their powers against judicial principle and has passed the impugned order and opened a new Pandora box in clear violation of Service law, hence, the said impugned order (along with appellate order, if any) is liable to be set aside, and the appellant may kindly be allowed to work on the post of Senior CT, GHSS NO. 2, Haripur.
- M. The appellant craves for leave of the Hon'ble Tribunal to raise additional grounds at the time of arguments.


PRAYER:-

It is humbly submitted that on acceptance of the present appeal, this Hon'ble Tribunal may graciously be pleased to:

- i. **Declare** the impugned order dated: 12-03-2024 of Respondent No. 2 and appellate order (if departmental appeal of appellant is rejected which is not in knowledge of appellant) and impugned transfer order dated: 21-03-2024 to the extent of respondent No. 3 as illegal, unlawful, without lawful authority and void ab initio by allowing the appellant to work on the post of Senior CT, Govt. Higher Secondary School No. 2, Haripur.
- ii. **Any** further better relief may also kindly be granted in the circumstances of the appellant's case.

Through

Appellant


Jehan Afsar Faizda Khel
Advocate High Court, Peshawar

Dated: 22/06/2024

Note. No such like is earlier filed by the appellant before this Hon'ble Tribunal.

5

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

Service Appeal No: _____ of 2024

Muhammad Ibrahim, Senior CT, Govt. Higher Secondary School No. 2,
Haripur.

Appellant

VERSUS

Director, Elementary & Secondary Education & others

Respondents

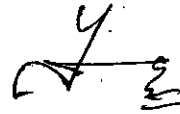
AFFIDAVIT

I, **Muhammad Ibrahim**, Senior CT, Govt. Higher Secondary School No. 2, Haripur, do hereby solemnly affirm & declare that the contents of the attached appeal are true and correct to the best of my knowledge & belief & nothing has been concealed or withheld from this Honorable Court.

Identified by


Jehan Afsar Painsa Khel
Advocate High Court.

Deponent



(6)

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No: _____ of 2024

Muhammad Ibrahim, Senior CT, Govt. Higher Secondary School No. 2,
Haripur.

Appellant

VERSUS

Director, Elementary & Secondary Education & others

Respondents

MEMO OF ADDRESSES

Muhammad Ibrahim, Senior CT, Govt. Higher Secondary School No. 2,
Haripur.

Appellant

VERSUS

1. Director

Directorate of Elementary & Secondary Education, Peshawar.

2. District Education Officer (M), Haripur.

3. Aizaz Ahsan, CT, GHSS No. 2, Haripur.

Respondents

Through

Appellant

Jehan Afsar Painsa Khel
Advocate High Court, Peshawar

Dated: 22/06/2024.

(7)

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No: _____ of 2024

Muhammad Ibrahim, Senior CT, Govt. Higher Secondary School No. 2,
Haripur.

Appellant

VERSUS

Director, Elementary & Secondary Education & others

Respondents

**Application for and on behalf of appellant/applicant for
suspension of the operation of impugned transfer order dated:
12-03-2024 till final disposal of main appeal.**

Respectfully Sheweth:

1. That the appellant/applicant filed the accompanied service appeal in which no date of hearing is yet fixed.
2. That at the time disposal of this application, the appeal and its supportive documents may be considered as integral part of this application.
3. That the impugned transfer order has been passed in blatant violation of service laws and rules, so the applicant has a genuine prima facie case in his hand and he is sanguine in respect of his success.
4. That there is no legal cavil in passing of order of suspension of impugned transfer order dated: 12-03-2024 and if the said order is not suspended and status quo is not ordered, the accompanying appeal would become infructuous and meaningless.

It is, therefore, most respectfully prayed that the operation of the impugned transfer order dated: 12-03-2024 may kindly be suspended and status quo be maintained till final disposal of main service appeal.

Appellant

Through

Jehan Afsar Paimda Khel
Advocate High Court, Peshawar

Dated: 22/06/2024

AFFIDAVIT

I, **Muhammad Ibrahim**, Senior CT, GHSS No. 2 Haripur, do hereby solemnly affirm & declare that the contents of the attached application are true and correct to the best of my knowledge & belief & nothing has been concealed or withheld from this Honorable Court.

Identified By:

Jehan Afsar Paimda Khel Advocate

Deponent

8

A

OFFICE OF THE DISTRICT EDUCATION OFFICER (M)

HARIPUR

Ph. No. 0995-920150, 920151, 920152

E-mail: deoharipur@yahoo.com



Adjustment Order.

The following adjustment is hereby made on his own pay & grade in the best interest of public service with immediate effect.

S.No	Name of Teacher	From	Adjusted at	Remarks
1	Muhammad Ibrahim CT (BPS-15)	GHSS Kachi	GHSS No.02 Haripur	Against vacant post on his own pay & grade due to in promotion zone.

Charge report should be submitted to all concerned.
TA/DA is not allowed.

----- sd -----

**District Education Officer (Male)
Haripur**

Endst:No. 2470 74 /F.No 6-6/EB/ Transfer Dated 08/04/2023

Copy submitted to the:-

1. Advisory to Chief Minister for E&SE KPK with reference to his direction dated: 03-04-2023.
2. Senior District Accounts Officer Haripur.
3. Principal/H concerned.
4. District Monitoring Officer Haripur.
5. EMIS Local Office Haripur.
6. Office record file.

**District Education Officer (Male)
Haripur.**



OFFICE OF THE DISTRICT EDUCATION OFFICER (M)
HARIPUR

Ph. No. 0995-920150, 920151.
Email: deomatchrpn@yahoo.com



ADJUSTMENT ORDER.

The adjustment of the following teaching staff of Elementary & Secondary Education Department due to shortage of staff is hereby made on their own pay & grade in the best interest of public service with immediate effect.

S.#	Name & Designation	From School	To School	Remarks
1	Ibrar Shah CT	GMS Banda Mian Pir Dad	GHS Kariplan	AVP due to shortage of staff
2	Muhammad Ibrahim Sr. CT	GHSS No.02 Haripur	GHS Badhora	AVP due to shortage of staff

Note: -

1. Charge report should be submitted to all concerned.
2. TA/DA is not allowed.

--sd--

District Education Officer (Male)
Haripur

Endst: No. 13934-37 / F.No.1-3/EB/ Adjustment Order

Dated: 12/03/2024

Copy submitted to the: -

1. Senior District Accounts Officer Haripur.
2. District Monitoring Officer Haripur
3. Principal / DDO Concerned.
4. EMIS Local Office Haripur.
5. Office record file.


 District Education Officer (Male)
 Haripur

بخدمت جناب ڈائریٹرز صاحبہ ایگزیکٹو ایجوکیشن خیبر پختونخواہ پشاور
 عنوان: درخواست اپیل برائے دادری بسلسلہ منسوخی ٹرانسفر آرڈر

جناب عالیہ

گزارش ہے کہ میں بطور سیکرٹری C.T گورنمنٹ ہائی سکولری سکول نمبر 2 ہری پور میں اپنے فرائض منصبی ادا کر رہا ہوں۔ تاہم 12.03.2024 کو میرا ایڈجسٹمنٹ آرڈر گورنمنٹ ہائی سکول بدھوڑا میں کر دیا گیا۔

جناب عالیہ

میری سروس کے تیس (30) سال پہاڑی علاقے میں گزرے ہیں اور گزشتہ سال 08.04.2023 کو مجھے شہری علاقے میں سروس کا موقع ملا ہے۔ میری گزارش ہے کہ مندرجہ ذیل وجوہات کی بنیاد پر میرا آرڈر نمبر 13934-37/F-No-1-3/Es ^{12/03/24} کنسل کیا جائے۔

- ۱۔ یہ کہ میری موجودہ سکول میں دورانہ ایک سال سے کم ہے۔
- ۲۔ میرے بڑے بھائی شدید علیل ہیں حال ہی میں ان کا گردہ ٹرانسپلانٹ کیا گیا ہے جس کے لیے ان کو انتہائی نگہداشت کی ضرورت ہے۔ میرا علاوہ انکی نگہداشت کرنے والا گھر میں کوئی نہیں ہے چونکہ وہ اولاد زینہ سے محروم ہیں۔ میرا دروازہ علاقے میں ہونا اور ان کو بروقت علاج وغیرہ کے لیے ڈاکٹر تک نہ پہنچانا ان کی زندگی کو شدید خطرات لاحق کر سکتا ہے۔

جناب عالیہ!

لہذا ملتس ہوں کہ میری اپیل پر میری دادری فرما کر میرا آرڈر کنسل / withdrawal فرمایا جائے تاکہ میں اپنے فرائض منصبی احسن طریقے سے انجام دینے کے ساتھ ساتھ اپنے بھائی کی زندگی بچانے میں بھی کردار ادا کر سکوں جس کے لیے میں تادیر آپ کا مشکور و ممنون رہوں گا۔

درخواست گزار

محمد ابراہیم سیکرٹری C.T گورنمنٹ ہائی سکولری سکول نمبر 2 ہری پور

مورخہ 13.03.2024

محمد ابراہیم سیکرٹری
 13-3-24

13934-37/F-No-1-3/Es



**OFFICE OF THE DISTRICT EDUCATION OFFICER (MD)
HARIPUR**

Ph. No. 0995 920150, 920151,
Email: deo@harip1063@yahoo.com



ADJUSTMENT ORDER

The adjustment of the following teaching staff is hereby made on their own pay & grade in the best interest of public service with immediate effect.

S. #	Name & Designation	Transferred		Remarks
		From	To	
1	Farooq Ullah SST (CI)	GHS Jan	GHS Abouli	Against Vacant Post
2	Gulfrax Khan SST (B/C)	GHS M.D Maira	GHS Huit Gali	Against Vacant Post
3	Mumtaz CT	GHS Dohandi	GHS S.N, Khim	Against Vacant Post
4	Zeeshan Qari	GHS Bandi Gulo	GHS No.3 Haripur	Against Vacant Post
5	Aizaz Ahsan CT	GHS Khanpur	GHS No.02 Haripur	AVP of Sr.CT on need basis

Note: -

1. Charge report should be submitted to all concerned.
2. TA/DA is not allowed to anyone.

District Education Officer (Male)
Haripur

Endst: No. 15441-46 /F.No.1-3/EB/ Adjustment Order Dated: 21/3 /2024

Copy submitted to the: -

1. Senior District Accounts Officer Haripur.
2. District Monitoring Officer (EMA) Haripur
3. Principal / DDO Concerned.
4. EMIS Branch Local Office.
5. Teachers concerned.
6. Office record file.

District Education Officer (Male)
Haripur

OFFICE OF THE PRINCIPAL GOVERNMENT HIGHER SECONDARY SCHOOL NO 2 HARIPUR.(OFFICAL CODE: 027/HS)
MONTHLY STAFF STATEMENT FOR THE MONTH OF /2024

1	2	3	4	5	6	7	8	9	10	11
S No	Name	Father Name	Designation	Date of Birth	Academic Qualification	Professional Qualification	Date of 1st Appointment	Date of Taken Over Charge In Present School	Name of Residential (City & Village)	Cell No
1	Saeed Ahmed	Oazi Baidar	Principal	07.03.1975	MA (Eng)	M.Ed	01.09.2003	16.03.2023	Changi Bandi Haripur	0333 5059489
2	Faisal Khan	Missal Khan	V.Principal	23.03.1979	MSc	M.Ed	29.09.2008	01.04.2018	Railway Station Havelian	0333 5057710
3	Mehrab Khan	Allah Dad Khan	SS (English)	02.02.1983	MA	M.Phil	16.04.2018	12.06.2021	Village Havelian	0334 6493039
4	Syed Sajid Hussain Shah	Syed Sabir Hussain Shah	SS (Economics)	15.03.1984	M.A	M.Ed	24.12.2010	28.06.2022	Feroz Pura Fort Road Haripur City	0341 9587823
5	Fawad Ahsan Nadeem	Abdul Malik	SS (Statistic)	04.12.1974	MSc	M.Ed	30.04.2012	01.09.2022	Haripur City	0333 5072748
6	Oazi Atiq-ur-Rehman	Oazi Abdul Rashid	SS (History Cum Civics)	05.04.1984	MA	M.Ed	01.01.2009	18.08.2022	Village Sikandarpur Haripur	0321-9832325
7	Muhammad Saeed	Muhammad Suleman	SS (Islamiat)	15.05.1970	MA	B.Ed	27.04.1993	18.06.2022	Iqbal Town Mochan Abbottabad	0345 5585224
8	Muhammad Waseem Khan	Raja Muhammad Ashraf	SS (Maths)	30.04.1971	M.Sc	M.Ed	01.09.2004	04.06.2021	Village Kot Najufah Haripur	0334 5384159
9	Sohad Ahmad Khan	Muqarab Khan	SS (Physics)	03.02.1972	MSc Phy	B.Ed	24.02.2000	30.08.2022	Village Band Atar Khan Havelian	0321 5677293
10	V/Post	0	SS (Chemistry)	0	0	0	0	0		C
11	Bashir Muhammad Khan	Mir Muhammad Khan	SS (Biology)	01.09.1967	MSC	B.Ed	01.09.2004	05.08.2022	Village Narsarba Lalku Marwat	0308 8555138
12	Sharafat Ali	Muhammad Suleman	SS (Urdu)	16.03.1983	MA	M.Ed	07.10.2007	18.06.2022	Village Jhangi Abbottabad	0313 5862325
13	Syed Noor Munazam Shah	Syed Azam Shah	IPPE	07.02.1987	MSC (HPE)	0	31.10.2020	31.10.2023	Village Sarai Saleh Haripur	0312 9728431
14	Taj Gohar	Gohar Rehman	SST	08.09.1974	BA	B.Ed	10.02.2007	29.10.2011	Mohallah Khoo Haripur	0340 1192773
15	Wajid Mehmood	Gulzar	SST	01.04.1979	MA	M.Ed	29.11.2008	01.04.2010	Haripur City	0321 9334902
16	Abdul Hameed	Muhammad Khan	SST	12.03.1967	MA	M.Ed	16.02.1988	21.11.2023	Village Gheba Haripur	0332 5072670
17	Muhammad Rafique	Muhammad Khan	SST	16.04.1972	MA	M.Ed	15.04.1996	18.08.2015	Abbottabad	0322 6924553
18	Naveed Khan	Hameed Khan	SST	15.06.1982	MA	M.Ed	30.04.2014	15.07.2022	Village Mochan Haripur	0323 5546006
19	Nasir Mehmood	Muhammad Abdullah	SST	30.03.1990	MA	B.Ed	03.05.2014	12.03.2020	Village Qazan Haripur	0322 9931858
20	Hafeez-ur-Rehman	Halfiz Manzoor-ur-Rehman	SST (Tech)	16.02.1971	MA	M.Ed	02.11.1995	08.11.2021	Village Sarai Saleh Haripur	0324 9845390
21	Rashad Mehmood	Sabir Khan	SST	01.06.1966	BA	B.Ed	19.01.1987	25.02.2013	Haripur City	0344 9134840
22	Syed Rizwan Ali Shah	Syed Nazir Hussain Shah	SST (Bio/Ch)	19.03.1987	MSc, Mphil	M.Ed	01.05.2017	24.08.2020	Rosh Sher Khan Haripur	0342 5555239
23	Shah Nawaz Khan	Chan Muhammad Khan	SST	13.01.1977	MA	M.Ed	01.07.1997	01.04.2013	Chhohar shant Haripur	0313 5819477
24	Ifkhar Ahmed	Abdur Rahim	SST (M/Phy)	12.03.1973	MA	M.Ed	11.04.1995	14.04.2018	Village Pharahala Haripur	0336 575074
25	Muhammad Ayub	Muhammad Ibrahim	SST	20.04.1964	MA	B.Ed	27.01.1991	04.08.2016	Haripur City	0336 575074
26	Awas Khan	Khanzada Khan	SST (M/Phy)	31.03.1991	MSc	M.Ed	01.05.2017	31.05.2020	Shah Muhammad Haripur	0332 9993753
27	Muhammad Abd Shafiq	Shafiq-ur-Rehman	SST (Bio/Ch)	16.06.1977	MSc	M.Ed	21.12.2011	21.05.2014	Babu Mohallah Haripur	0346 5610115
28	Aamir Ali	Jamshaid Akhtar	SST (I.T)	13.02.1993	BS	B.Ed	28.05.2020	28.05.2020	Kot Najbullah Haripur	0348 5670255
29	Atif Qazi	Ahmed Saeed Qazi	Sr CT	25.03.1976	M.A	B.Ed	01.02.1999	01.01.2018	Railway Station Haripur	0315 9953484
30	Khali-ur-Rehman	Hafiz Abdur Rehman	Sr CT	02.05.1964	MA	B.Ed	16.10.1986	26.11.2011	Haripur City	0324 5072937
31	Muhammad Irshad	Muhammad Younas	Sr CT	08.04.1968	MA	B.Ed	13.03.1990	01.01.2021	Sikandarpur Haripur	0343 5467323
32	Habib Shah	Syed Amir Shah	Sr CT	23.03.1967	BA	CT	02.03.1993	31.05.2012	T.P Haripur	0334 5319301
33	Zulfiqar Ahmed	Haji Ahmed	Sr CT	10.09.1969	BA	B.Ed	06.01.1988	01.08.2010	Sikandarpur Haripur	0334 5073340
34	Rafique Ahmed	Gul Ahmed	Sr CT	06.04.1967	MA	B.Ed	15.09.1988	11.11.2012	Manikara Haripur	0321 9721150
35	Fazal-e-Mabood	Daim Din	Sr CT	20.12.1974	M.Phil	M.Ed	11.04.2000	06.11.2021	Village Majhar Haripur	0332 5075228
36	Muhammad Banans	Gul Zaman	Sr CT	09.03.1970	MA	M.Ed	31.03.1992	29.11.2021	Village Bayan Ahmad Ali Khan	0345 5664963
37	Hasrat Mehmood	Ghulam Rasool	Sr CT	12.03.1970	MA	M.Ed	21.03.1992	28.09.2018	Village Talokar Haripur	0333 5170213
38	Muhammad Saadique	Shera	Sr CT	02.01.1985	BA	CT	15.02.1987	14.04.2015	Village Kallage Haripur	0346 9573620
39	Rashad Khan	Nazik Khan	Sr CT	01.05.1967	MA	M.Ed	16.09.1986	01.08.2017	Vill & P O KTS Kalis Haripur	0313 5996182
40	Muhammad Ibrahim	Shah Zaman	Sr CT	25.02.1972	MA	M.Ed	10.01.1993	10.03.2023	Haripur City	0348 6056556
41	Ab Zahid	Ali-ur-Rehman	Sr CT	15.03.1966	BA	B.Ed	15.09.1988	31.03.2012	Vill Sikandarpur	0331 6091630

1	2	3	4	5	6	7	8	9	10	11
S No	Name	Father Name	Designation	Date of Birth	Academic Qualification	Professional Qualification	Date of 1st Appointment as a	Date of Taken Over Charge in Present School	Name of Residential (City & Village)	Cell No
42	Syees Zaheer Hussain Shah	Syed Amir Hussain	Sr CT (Tec)	13.03.1968	DAE	CT (Tec)	18.12.1990	06/04/2006	T.P Hanpur	0334 8382754
43	Muhammad Shabbir	Muhammad Ishaq	Sr CT	29.05.1972	MA	M.Ed	22/03/1992	18.05.2018	Village Pharamla Hanpur	0344 9434918
44	Khurshid Ahmad	Abdul Khaliq	CT	01.01.1971	BA	B.Ed	01.07.1997	07/07/2021	Village KTS Hanpur	0311 2592437
45	Fazl Muhammad	Muhammad Mehfooz	CT	24.01.1973	BA	CT	13.10.1994	09/09/2017	Village Pharamla Hanpur	0323 5525500
46	Shahzad Aslam	Muhammad Aslam	CT	05.04.1976	MA	B.Ed	01.09.2009	29/09/2020	Railway Station Hanpur	0333 5081495
47	Shoukat Mehmood	Karam Elahi	CT	15.04.1973	MA	M.Ed	01.07.1997	03/02/2017	TIP Hanpur	0334 5651855
48	Tano Mehmood	Malik Banaras	CT	13.04.1971	MA	M.Ed	25.06.1997	04.08.2016	Mallah Outlet Sparke Hanpur	0321 5623405
49	Rafique Asghar	Ali Asghar	Sr PET	06.10.1981	MSc HPE	B.Ed	05.09.2006	22.10.2020	Darwesh Hanpur	0345 8237910
50	Muhammad Khalid Farooq	Abdul Aziz	Sr PET	04.02.1975	MSc HPE	SDPE	07.04.1999	04.10.2012	Vill. Koka PO Rehara H Pur	0345 8237910
51	Fandoon Khan	Muhammad Zaman	PET	11.02.1980	MA	M Ed	01.09.2004	09.12.2014	Fort Road Hanpur	0300 5167864
52	Abdul Qadeer	Muhammad Latif	Sr DM	25.05.1968	MA	B.Ed	20.09.1992	19.12.2023	Village & PO S/Saleh Hanpur	0333 5058121
53	Moeen-ud-Din	Salah-ud-Din	Sr DM	11.05.1970	MA	B.Ed	02.04.1997	21.12.2023	Village & PO S/Saleh Hanpur	0333 5077502
54	Rehan Gul	Muhammad Yaqoob	DM	14.07.1981	BA	B.Ed	10.01.2012	24/05/2019	Darwesh Hanpur	0323 8192674
55	Jamil-ur-Rehman	Fazal-ur-Rehman	Sr AT	10.02.1977	FA	Shahad	10.04.1999	11.10.2017	Moh. Daud Abad Hanpur	0321 9932595
56	Khawar Ejaz	Muhammad Ejaz	Sr TT	10.02.1986	MA/Med Isl	Shahad	10.05.2007	21.02.2013	Village Pharamla Hanpur	0334 8388511
57	Muhammad Younis	Muhammad Idrees	TT	18.03.1969	SSC	Shahad	02.05.1992	01.12.2014	Moh. Atzal Abad C/Jal HRP	0322 9303392
58	Muhammad Asif	Muhammad Ashraf	Dari	01.04.1985	MA	M.Ed	01/01/2019	01.10.2021	Noor Colony Hanpur	0334 8382999
59	Iqbalan	Mir Sultan	CT IT Lb/Inc	31.01.1989	MSc Hons	B.Ed	13.08.2016	19.08.2019	Hanpur City	0332 5302142
60	Muhammad Azam	Muzaffar Khan	Sr/Clerk	01.01.1972	BA	0	14.02.1998	15.02.2021	Village Muradabad Hanpur	0302 5302252
61	Jamshed Khan	Pur Dil Khan	Sr/Clerk	15.05.1972	BA	CT	30.08.1997	15.02.2021	Hanpur City	0333 5058233
62	Shahzeb	Aurangzeb	JIC	14.03.1995	BA	0	08.03.2017	18.12.2021	Village Talokar Hanpur	0331 9291947
63	Shahed Ahmad	Aurangzeb	Lab Assistant	15.01.1995	BA	0	14.10.2017	22/01/2021	Village Bareela Hanpur	0315 1126581
64	VIPost		0 ASK		0	0	0	0		0
65	Muhammad Shakeel	Muhammad Ashraf Khan	W/Att	01.01.1985	Middle	0	23.10.2015	23.10.2015	Changi Bandi Hanpur	0315 5072349
66	Anas Khan	Muhammad Younas	L/Att	02.10.2001	Primary	0	26.06.2021	26.06.2021	Mankarai Road Hanpur	0302 1186067
67	Riaz Ahmed	Munsif Khan	L/Att	12.11.1968	Middle	0	01.07.1989	01/07/1989	Hanpur City	0344 8413544
68	Nadir Nawaz	Muhammad Nawaz	W/C	14/08/1996	F.A	0	13.09.2019	05.10.2019	Darwesh Hanpur	0348 9211580
69	Muhammad Ayoub	Muhammad Yaqoob	Mail	10.02.1974	Primary	0	01.06.1992	01.06.1992	Gher Khan Hanpur	0306 5027363
70	Nisar Ahmad	Gul Muhammad	N/O	03.04.1973	Primary	0	11.04.1996	21.10.2021	Mankarai Hanpur	0321 9567233
71	Usman Qamar	Mumtaz Ahmed	N/O	28.11.1985	SSC	0	22.06.2019	01/07/2019	Hanpur City	0335 9449149
72	Shoukat Khan	Ajab Khan	W/C	13.04.1969	Middle	0	31.05.2010	23/09/2010	Hanpur City	0321 9842282
73	Muhammad Khurshid	Zardad	SWP	02.01.1985	Primary	0	15.12.1995	12/02/1996	Naka Pan Hanpur	0343 9520205
74	Amir Zaman	Gohar-ur-Rehman	Chowkidar	21.03.1984	SSC	0	26.06.2021	26.06.2021	Morali Casteel Shaba Hanpur	0334 5681744
75	Bital Ahmed	Mushaq Ahmed	Chowkidar	14.05.1990	SSC	0	25.05.2010	25.05.2010	Sardar Salah Hanpur	0334 9492568
76	Sardar Asif Khan	Sardar Ajab Khan	Chowkidar	01/02/1977	FA	0	10/11/2010	10/11/2010	TIP Hanpur	0345 9828588
77	Noman Tahir	Tahir Mehmood	SWP	02/02/1997	Middle	0	05/08/2022	29/11/2022	S/N Khan Hanpur	0314 9916273


Dated _____

Signature _____ Office Stamp _____

50 روپے

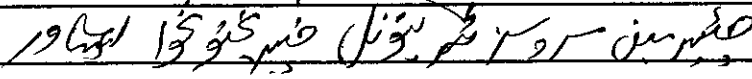
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پشاور بار ایسوسی ایشن، خیبر پختونخواہ

ایڈوکیٹ: PESHAWAR
BAR ASSOCIATION

بار کونسل ایسوسی ایشن نمبر: 09-1646-09

رابطہ نمبر: 0333-9433554

بعدالت جناب:  محکمہ سروسز ٹرنیٹل ضلع کونڈوخواہ پشاور

منجانب: <u>اسلامیٹ</u>	دعویٰ:
	علت نمبر:
محمد ابراہیم <u>بنام ڈائریکٹر</u> <u>ESSED</u> <u>99</u>	موضوع:
اسلامیٹ	جرم:
	تھانہ:

بابت تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ آن مقام ضلع کونڈوخواہ پشاور کیلئے جہان اختر ڈائریکٹر ESSED کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کال 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 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظریاتی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے 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 داختم 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 پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 27/06/2024

مقام پشاور کے لیے منظور ہے۔

Attested by



نوٹ: اس وکالت نامہ کی فوٹوکاپی ناقابل قبول ہوگی۔

محمد ابراہیم (اسلامیٹ)

