


FORM OF ORDER SHEET

Court of _____

Appeal No. 925/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/07/2024	<p>The appeal of Mr. Hidayat Ullah presented today by Mr. Asghar Ali Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar today on 04.07.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

BEFORE THE PROVINCIAL SERVICE TRIBUNAL KPK. PESHAWAR

S.A No. 925 /2024

Hidayat Ullah.....Appellant

VERSUS

The Government of Khyber Pakhtunkhwa through Chief Secretary, &
Others.....Respondents

**APPLICATION FOR HEARING OF THE ABOVE TITLED APPEAL AT
PRINCIPAL SEAT, PESHAWAR FOR TODAY AND LATTER ON SHIFTED
AT BANNU BENCH.**

Respectfully Sheweth,

1. That the titled appeal has been filed before this Hon'ble Tribunal at principal seat, Peshawar.
- 2: That the matter is urgent one which required the suspension of the impugned notification.

Keeping in view, what has been stated above, it is, therefore, humbly prayed that the titled appeal may kindly be heard at principal seat. Peshawar in the best interest of justice, so that justice be done.

Dated: 04/07/2024

Through

Asghar Ali Khan
Appellant/Applicant

Asghar Ali Khan
Daim Khel
ASC

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO 925 /2024

HIDAYAT ULLAH (Appellant)

VERSUS

**GOVT OF KPK THROUGH CHIEF SECRETARY PESHAWAR & OTHERS
..... (Respondents)**

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Dated: 12/06/2024

Appellant

HIDAYAT ULLAH

hidayat531981@gmail.com

Mob: 0346-9293646

Through counsel

ASGHAR ALI KHAN

DAIM KHEL ASC

BANNU.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO 925 /2024

HIDAYAT ULLAH SENIOR LIBRARIAN (BPS-18) S/O
KHAN MOMIN R/O MASHA MANSOOR TEHSIL AND
DISTRICT LAKKIMARWAT, AT PRESENT SENIOR
LIBRARIAN GDC SIKANDER KHEL BALLA BANNU
..... (Appellant)

VERSUS

- 1) GOVT OF KPK THROUGH CHIEF SECRETARY
PESHAWAR SECRETARIAT PESHAWAR.
- 2) SECARETRAY HIGHER EDUCATION PESHAWAR.
- 3) Mr. AHMAD HUSAIN LIBRARIAN (BPS-17) GDC ESSAK
KHEL LAKKI MARWAT(Respondents)

APPEAL:

Agghe Ad
APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWASERVICE TRIBUNAL ACT NO. 1 OF
1974.THE APPELLANT WAS RENDERING HIS DUTY AS A
LIBRARIAN ON POST BPS-17 IN GDC AMAKHEL
DISTRICT TANK BUT THROUGH NOTIFICATION NO.
SO(C-IV)/HED/19-8/LIBRARIAN (MALE) /2023 THE
APPELLANT WAS PROMOTED FROM BPS 17 TO BPS 18
ON REGULAR BASIS WITH IMMEDIATE EFFECT AND
TRANSFERD AND POSTED AS A SENIOR LIBRARIAN IN
BPS-18 IN GDC ESSAK KHEL LAKKI MARWAT IN PLACE
OF RESPONDENT No.3 BUT MALA FIDELY ACTION
TAKEN BY THE RESPONDENT No.2 AND PARTILLY
MODIFIED THE THEN NOTIFICATION NO. SO(C-
IV)/HE/19-8/PSB/LIB TO SR. LIB (BS-18) MALE/2023 DATED
29, FEBRUARY 2024, OF THE EVEN DATE 21.02.2024, AND
AJUSTIDED THE RESPONDENT NO.3 IN THE GDC ESSAK
KHEL LAKKI MARWAT THROUGH THE IMPUGNED
NOTIFICATION WHICH WAS ILLEGAL WITHOUT
LAWFULL AUTHORITY AND THE PETITIONER ONCE
AGAIN TRNASFERD TO GDC SK BALLA BANNU AND
AGAINST NO ACTION TAKE ON THE DEPARTMENTAL
APPEAL OF THE APPELLANT.

PRAYER:

ON ACCEPTANCE OF THE INSTANT APPEAL THE
IMPUGNED ORDER / NOTIFICATION NO. SO(C-IV)/HE/19-

8/PSB/LIB TO SR. LIB (BS-18) MALE/2023 DATED 29, FEBRUARY 2024, MAY VERY KINDLY BE SET ASIDE AND THE APPELLANT MAY BE PLEASED RETRANSFERRED FROM THE GDC SK BALLA BANNU TO THE GDC ESSAK KHEL LAKKI MARWAT AND MAY BE PLEASED ALLOWED THE APPELLANT TO COMPLETE HIS TENURE IN OFFICE AS A SENIOR LIBRARIAN AND ANY OTHER REMEDY DEEM FIT MAY ALSO BE GRANTED.

Respectfully Sheweth:

- 1) That the appellant was rendering his duty as a librarian on post BPS-17 in GDC AMA Khel district Tank from 16 March 2021, upto 21 February 2024 vide notification No.SO(C-IV)HED/8-3/Male Lib/Hidayat Ullah dated 16 march 2021 is enclosed as annexure "A".
- 2) That the respondent No.1 provincial Govt of KPK through the respondent No.2 recommended PSB on 19-09-2023 and promoted Thirteen (13) Male Librarian (BPS-17) Officers ie' (Muhammad Hanif Shah, Mr.Abdul Kalam Ahmad, Mr. Zulfiqar Ali Khan, Muhammad Ali Khan, Mr. Shoaib Jan, Mr. Dawood Shah, Muhammad Nawaz, Muhammad Quarish, (Mr. Hidayat Ullah the appellant), Syed Zaib Ullah Shah, Mr. Rizwan Ullah, Mr. Karim Khan and Mr. Shah Khalid) to senior librarian in BPS-18 on regular basis with immediate effect. With the request to furnished posting proposal **Domicile** based in respect of the promoted officers. Vide notification No. SO(C-IV)/HED/19-8/Librarian to Senior Librarian (Male)/2023 dated 21-11-2023. Copy of the Notification is enclosed as annexure "B".
- 3) That the respondent No.1 through respondent No.2 all the Male Senior librarian adjusted against their vacant respective posts. Vide notification No. SO(C-IV)/HE/19-8/PSB/Lib to Sr. Lib (BPS-18) Male/2023. Copy of the notification is annexure "C".
- 4) That the respondent No.2 intentionally illegal, without lawful authority and mala fide partially modified the impugned notification No. SO(C-IV)/HE/19-8/PSB/Lib To Sr. Lib (BS-18) Male/2023 Dated 29, February 2024, and adjusted the respondent No.3 in DGC Essak Khel lakki Marwat copy of the impugned notification as annexure "D".
- 5) That the appellant submitted departmental appeal against the impugned transferred order dated 12/03/2024 but no action taken on the departmental appeal of the appellant. Copy of the departmental appeal is annexure "E".

Aghe Ad

- 6) That now the appellant has no option but to indulge this honorable tribunal into the matter, inter alia, the following grounds:-

GROUND:

- 1) That from the situation it indicates that the respondents had taken the law in their own hand and transgressed the powers, essentially in the matter.
- 2) That the law does nothing in vain and commands nothing in vain.
- 3) That respondents having no unfetter power to exercise unlimited powers but will be do as per law. And the legislatures determined the boundaries of powers to exercise it within the ambit of law.
- 4) It is notice able that the appellant was transferred on administrative grounds. Which shows mala fide on the part of respondent and on this scored alone the impugned transferred order is liable to be set aside.
- 5) That the respondents also violated the transferred/policy notified by the provincial government KP read with the letter of the establishment department dated 27/02/2013 pertaining to posting/transfer the relevant para-2 of the said letter is reproduced as under for ready reference;

"Tenure, posting and transferred; when the ordinary tenure for a posting has been specified in the law or rules made there under, such tenure must be respected and cannot be varied, except for compelling reasons, which should be recorded in writing and are judicial reviewable."

While the respondent's exercised their sweet-will power and the appellant was victimized by the respondent on the basis of political figure Moreover, transfer/Posting on administrative ground is not permissible under the law.

- 6) That the appellant was discriminated without any kind of complaint by written or verbally and he was penalized in shape of transfer. Further the impugned notification relating to the transfer of the appellant dated 29/02/2024 is pre mature and based on mala fide.
- 7) That the appellant belonged and bona fide resident of village Mashah Mansoor of District Lakki Marwat. While the respondent No.3 was not promoted from BPS-17 to BPS-18, therefore. he

cannot utilize the request of posting proposal. Because there is no stand by post of BPS-17 to performed duty by the respondent No.3.

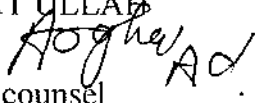
- 8) That it is pertinent to mention here and also notice able that the respondent No.3 he completed his ordinary tenure and rendered his services above his tenure i.e. about 4 years. And in this respect biometric service is liable to be checked up.
- 9) That additional grounds would be raised at the time of final submission.

It is, therefore, humbly prayed that instant appeal of the appellant may kindly be accepted and the impugned transfer order/notification partially modified the then notification No. SO(C-IV)/HE/19-8/PSB/Lib To Sr. Lib (BS-18) Male/2023 Dated 29, February 2024, may kindly be set aside and appellant may be pleased retransferred to the office of the Principal GDC Essak Khel Lakki Marwat and may further kindly be allowed the appellant to complete his tenure in the said above office (Office of the Principal GDC Essak Khel Lakki Marwat).

Dated: 12/06/2024


Appellant

HIDAYAT ULLAH


Through counsel

ASGHAR ALI KHAN DAIM KHEL ASC
BANNU.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO _____ /2024

HIDAYAT ULLAH (Appellant)

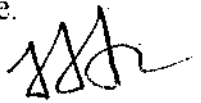
VERSUS

GOVT OF KPK THROUGH CHIEF SECRETARY PESHAWAR & OTHERS
..... (Respondents)

AFFIDAVIT.

I Mr. HIDAYAT ULLAH S/O KHAN MOMIN R/O MASHA MANSOOR TEHSIL AND DISTRICT LAKKI MARWAT (Appellant), do hereby solemnly affirms and declare on Oath, that the whole contents of the instant Service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable. Tribunal Nor any part of it is false.

DEPONENT



Dated: 12/06/2024

Cell No# 0346-9293646

0334-9293500

CNIC#11201-0356626-7



IDENTIFICATION

The Deponent Identified By

MR. ASGHAR ALI KHAN DAIM.KHEL

ASC BANNU

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO _____/2024

HIDAYAT ULLAH (Appellant)

VERSUS

**GOVT OF KPK THROUGH CHIEF SECRETARY PESHAWAR & OTHERS
..... (Respondents)**

CERTIFICATE

It is, certified, that no earlier such service appeal before this
Honorable service tribunal of KP Peshawar been Filled.

Dated: 12/06/2024

Asghar Ali Khan


Appellant

HIDAYAT ULLAH
Through counsel

**ASGHAR ALI KHAN DAIM KHEL ASC
BANNUL**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO _____ /2024

HIDAYAT ULLAH SENIOR LIBRARIAN (BPS-18) S/O
KHAN MOMIN R/O MASHA MANSOOR TEHSIL AND
DISTRICT LAKKIMARWAT, AT PRESENT SENIOR
LIBRARIAN GDC SIKANDER KHEL BALLA BANNU
..... (Appellant)

VERSUS

GOVT OF KPK THROUGH CHIEF SECRETARY PESHAWAR &
OTHERS..... (Respondents)

ADDRESS FORM


HIDAYAT ULLAH SENIOR LIBRARIAN (BPS-18) S/O
KHAN MOMIN R/O MASHA MANSOOR TEHSIL AND
DISTRICT LAKKIMARWAT, AT PRESENT SENIOR
LIBRARIAN GDC SIKANDER KHEL BALLA BANNU
..... (Appellant)

VERSUS

- 1) GOVT OF KPK THROUGH CHIEF SECRETARY
PESHAWAR SECRETARIAT PESHAWAR.
- 2) SECARETRAY HIGHER EDUCATION PESHAWAR.
- 3) Mr. AHMAD HUSAIN LIBRARIAN (BPS-17) GDC ESSAK
KHEL LAKKI MARWAT(Respondents)

Note: Addresses of the parties given above are sufficient to serve notices upon them.

Dated: 12/06/2024


Appellant
HIDAYAT ULLAH
Through counsel


ASGHAR ALI KHAN DAIM KHEL ASC
BANNU.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO _____/2024

HIDAYAT ULLAH (Appellant)

VERSUS

**GOVT OF KPK THROUGH CHIEF SECRETARY PESHAWAR & OTHERS
..... (Respondents)**

**APPLICATION FOR GRANTING STATUS QUO IN THE ABOVE TITLED SERVICE
APPEAL, AND MAY KINDLY BE SUSPENDED THE IMPUGNED NOTIFICATION
NO. SO(C-IV)/HE/19-8/PSB/LIB TO SR. LIB (BPS-18) MALE/2023
DATED 29-02-2024 ;TILL THE DISPOSAL OF THE INSTANT SERVICE
APPEAL.**

RESPECTFULLY SHEWETH;

1. That the applicant/appellant has filed the accompanied service appeal on material points of law and facts and the applicant is sanguine of his success in the appeal which may be read along with the present.
2. That the applicant has a prima facie case, therefore, if the mandatory injunction / status quo is not granted, the applicant would sustained irreparable loss/injury.
3. That the balance of convenience also lies in favor of applicant.
4. That the facts of the case and law also approve the grant of the present one.
5. That additional grounds would be raised at the time of final submission.

It is, therefore, humbly prayed that the instant application may graciously be accepted and Status Quo may be granted and may kindly be suspended the impugned notification NO. SO(C-IV)/HE/19-8/PSB/Lib to Sr. Lib (BPS-18) Male/2023 dated 29-02-2024 TILL THE DISPOSAL OF THE INSTANT SERVICE APPEAL.

APPLICANT

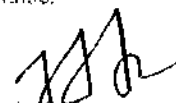
HIDAYAT ULLAH



AFFIDAVIT.

I Mr. HIDAYAT ULLAH S/O KHAN MOMIN R/O MASHA MANSOOR TEHSIL AND DISTRICT LAKKI MARWAT (Appellant), do hereby solemnly affirms and declare on Oath, that the whole contents of the instant Service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable. Tribunal Nor any part of it is false.

DEPONENT





9 "A"

**GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES AND
LIBRARIES DEPARTMENT**

Dated Peshawar the, March 16, 2021.

NOTIFICATION

NO. SO(C-IV)HED/8-3/Male Lib/Hidayat Ullah/2021. The Competent Authority is pleased to order the transfer of Mr. Hidayat Ullah Librarian (BPS-17), Govt. Degree College Kakki Bannu to Govt. Degree College Ama Khel, Tank against the vacant post with immediate effect.

**SECRETARY
HIGHER EDUCATION DEPARTMENT**

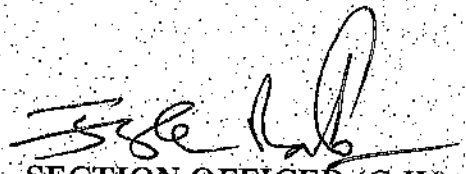
ENDST: NO. & DATE EVEN.

Copy forwarded to the:-

1. Director, Higher Education, Khyber Pakhtunkhwa Peshawar.
2. Deputy Director (HEMIS) Cell, Higher Education Department.
3. Principal, Govt. Degree College Ama Khel, Tank.
4. Principal, Govt. Degree College, Kakki Bannu.
5. District Account Officers Bannu / Tank.
6. Officer Concerned.
7. Master File.

*Alerted to both
copy*

*Higher
Ad*


SECTION OFFICER (C-IV)
16/03/2021



10

" B "

**GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES AND
LIBRARIES DEPARTMENT**

Dated Peshawar the November 21, 2023

NOTIFICATION.

NO.SO(C-IV)/HED/19-8/Librarian to Senior Librarian (Male) /2023. The Competent Authority (Chief Minister, Khyber Pakhtunkhwa) on the recommendations of the Provincial Selection Board in its meeting held on 19.09.2023, is pleased to promote the following Male Librarian (BPS-17) of College Cadre, Directorate of Higher Education, Khyber Pakhtunkhwa to the post of Senior Librarian (BPS-18) on regular basis with immediate effect:-

S.No	Name of Officer	S.No	Name of Officer
1.	Muhammad Hanif Shah	8.	Muhammad Quraish
2.	Mr. Abul Kalam Ahmad	9.	Mr. Hidayat Ullah
3.	Mr. Zulfiqar Ali Khan	10.	Syed Zaib Ullah Shah
4.	Muhammad Ali Khan	11.	Mr. Rizwan Ullah
5.	Mr. Shoaib Jan	12.	Mr. Karim Khan
6.	Mr. Dawood Shah	13.	Mr. Shah Khalid
7.	Muhammad Nawaz		

2. The officers on promotion will remain on probation for a period of one year, in terms of Section-6 (2) of the Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-15 (1) of Khyber Pakhtunkhwa Government Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 extendable for another year with specific orders of the appointing authority within two months of the expiry of first year of probation period as specified in Rule-15 (2) of Rules ibid.

3. The posting/transfer Notification in respect of the above officers will be issued later on.

-Sd-
SECRETARY
HIGHER EDUCATION DEPARTMENT

Endst: No.& Date as above.

Copy forwarded to:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director Higher Education Khyber Pakhtunkhwa **with the request to furnished posting proposal domicile based in respect of the promoted officers, please.**
3. PS to Minister, Higher Education Department, Khyber Pakhtunkhwa.
4. Deputy Director (HEMIS Cell) Higher Education Department.
5. District Account Officer concerned.
6. The Manager, Government Printing Press Khyber Pakhtunkhwa.
7. Officers concerned.
8. PS to Secretary, Higher Education Department.
- ✓ 9. Master File

*Alerted
to his true copy
Ajgha
not*

(Zahid Kamal)
SECTION OFFICER (C-IV)



11 "C"
**GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES AND
LIBRARIES DEPARTMENT**

Phone No. 9213501-2 Ext. 20 Fax #091-9210368

Dated Peshawar the, February 21, 2024

NOTIFICATION

NO. SO(C-IV)/HE/19-8/PSB/Lib to Sr. Lib (BS-18) Male/2023:

Consequent upon their promotion to the post of Senior Librarians (BS-18), Directorate of Higher Education, Khyber Pakhtunkhwa as notified vide this Department Notification of even No. dated 21.11.2023, the following posting/transfers and adjustments are hereby ordered in the best public interest, with immediate effect:-

S#	NAME & DESIGNATION	PRESENT STATION	PROPOSED AT	REMARKS
1.	Mohammad Hanif Shah	GDC No.2 D.I Khan	GDC No.2 D.I Khan	a. Already occupied b. Domicile, Bannu
2.	Mr. Abul Kalam Ahmad	GDC Lachi Kohat	GDC KDA Kohat	a. Vice S. No. 03 of the adjustment. b. Domicile, Kohat
3.	Mr. Zulfiqar Ali Khan	GPGC Mansehra	GDC Balakot, Mansehra	a. AVP b. Domicile, Mansehra
4.	Muhammad Ali Khan	GDC Bagh Deri (Swat)	GDC Ekka Ghund	a. AVP b. Domicile, Charsadda
5.	Mr. Shoaib Jan	GPGC Charsadda	GDC Tangi Charsadda	a. Vice S. No. 01 of the adjustment. b. Domicile, Charsadda
6.	Mr. Dawood Shah	GDC Garhi Kapora, Mardan	GDC Takht Bhai Mardan	a. AVP b. Domicile, Mohmand
7.	Muhammad Nawaz	GPGC No. 1 Abbottabad	GPGC Mandian Abbottabad	a. Vice S. No. 02 of the adjustment. b. Domicile, Mansehra
8.	Muhammad Quraish	GDC Jawar Buner	GDC Jawar, Buner	a. Already occupied b. Domicile, Buner
9.	Mr. Hidayat Ullah	GDC Amakhel Tank	GDC Essak Khel Lakki Marwat	a. AVP b. Domicile, Lakki Marwat
10.	Mr. Syed Zaib Ullah Shah	GDC Chaghar Matti Peshawar	GDC Naguman Peshawar	a. AVP b. Domicile, Peshawar
11.	Mr. Rizwan Ullah	GDC Pabbi, Nowshera	GDC Pabbi, Nowshera	a. Already occupied b. Domicile, Peshawar
12.	Mr. Karim Khan	GDC Chamla Buner	GDC Bakhshali Mardan	a. AVP b. Domicile, Dir
13.	Mr. Shah Khalid	GDC Yar Hussain Swabi	GDC Yar Hussain Swabi,	a. Already occupied b. Domicile, Kurram

P.T.O

Attested

to be true copy

Aggrew A.C.

**GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES AND
LIBRARIES DEPARTMENT**

02. Consequent upon the above, the following adjustment of Librarians are also proposed.

S#	Name & Designation	Present station	Proposed station	Remarks
1.	Mr. Abid Ullah Librarian (B-17)	GDC Tangi Charsadda	GDC Khairabad Mardan	a. AVP b. Charsadda
2.	Mr. Akhlaq Ahmad Librarian (B-17)	GPGC Mandian Abbottabad	GDC Matta Swat	a. Against vacant post of senior Librarian (B-18) in his Own Pay Scale
3.	Muhammad Basir Librarian (B-17)	GDC KDA Kohat	GDC Gulbahar Peshawar	a. AVP b. Mohmand
4.	Mr. Ihsan Ullah, Librarian (B-17)	GDC Gulbahar Peshawar	GDC Chaghar Matti Peshawar	a. AVP b. Peshawar
5.	Mr. Ahmad Hussain Librarian (B-17)	GDC Essak Khel Lakki Marwat	GDC Aman Khel Tank	a. AVP b. Lakki Marwat
6.	Mr. Nasir-Raziq, Librarian (B-18)	GDC Badaber Peshawar	GDC Akber Pura Nowshera	a. AVP b. Peshawar
7.	Mr. Wasiullah Librarian (B-17)	GDC Chakesar Shangla	GDC Badaber Peshawar	a. AVP b. Peshawar
8.	Mr. Amjid Ali Librarian (BPS-17)	Public Library, Swabi, Directorate of Archives and Libraries	Public Library, Mardan Directorate of Archives and Libraries	a. AVP b. Mardan

-Sd-

SECRETARY

HIGHER EDUCATION DEPARTMENT

Endst; No. & Date as above.

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, Higher Education, Khyber Pakhtunkhwa, Peshawar.
3. Regional Directorate of Higher Education Bannu, Swat, Abbottabad.
4. Deputy Director (HEMIS Cell), Higher Education Department.
5. The Manager, Government Printing Press Khyber Pakhtunkhwa.
6. All Principals concerned.
7. All Districts Accounts Officers concerned
8. PS to Secretary, Higher Education Department.
9. Officers concerned.
10. Master file.

(ZAHID KAMAL)
SECTION OFFICER



GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES AND
LIBRARIES DEPARTMENT

Phone No: 9213501-2 Ext: 20 Fax: 091-9210368

Dated Peshawar the February 29, 2024

CORRIGENDUM

NO. SO (C-IV) / HE / 19-8 / PSB / Lib to Sr. Lib (BS-18) Male / 2023. In partial modification of this Department's Notification of even No. dated 21.02.2024, the posting/transfers of Librarians appearing at S. No. 09, and adjustment of Sr. No. 02 & 05 may be read as under:-

Sr. #	Name of Officer	Present / Existing Station	Proposed Station	Remarks
1.	Mr. Hidayat Ullah, Senior Librarian (BS-18)	GDC Essak Khel Lakki Marwat	GDC S.K Bala Bannu	AVP
2.	Mr. Ahmad Hussain Librarian (BS-17)	GDC Amakhel Tank	GDC Essak Khel Lakki Marwat	Vice Sr. No. 01
3.	Mr. Akhalq Ahmad Librarian (BS-17)	GDC Matta Swat	GDC Dasso Kohistan	AVP

-Sd-
SECRETARY
HIGHER EDUCATION DEPARTMENT

Endst; No. & Date as above.
Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, Higher Education, Khyber Pakhtunkhwa, Peshawar.
3. Regional Directorate of Higher Education: Bannu, Swat, Abbottabad.
4. Deputy Director (HEMIS Cell), Higher Education Department.
5. The Manager, Government Printing Press Khyber Pakhtunkhwa.
6. All Principals concerned.
7. All Districts Accounts Officers concerned.
8. PS to Secretary, Higher Education Department.
9. Officers concerned.
10. Master file.

(Signature)
(Zahid Kamal)
SECTION OFFICER (C-IV)

Attested
to be true copy
Ad

29/2/24

16

" E "

To

The Secretary
Higher Education Archives &
Libraries Department K.P.K

Subject: Application for transfer of Hidayat Ullah Senior Librarian (BPS-18) from GDC S.K Bala Bannu to GDC Essak Khel Lakki Marwat.

Respected Sir,

1. Its humbly stated that I am doing my job as a Librarian (BPS-17) at GDC Amma Khel Tank since last 3 years.
Then I have been promoted as senior Librarian (BPS-18) through PSB held on dated 19-09-2023 at serial N.O 09, the said department issued a notification dated 21-11-2023 in which it is stated that the promoted officers should be adjusted on Domicile base. (Annex-I).
 2. Later on an adjustment notification has been issued dated 21-02-2024 in which at (S. No 09) I have been adjusted at GDC Essak Khel Lakki Marwat. (Annex-II)
 3. Then again an another transfer notification issued dated 29-02-2024 in which I have been transferred to GDC S.K Bala Bannu. Which is a about 87 KM far away from my native village. While Ahmad Hussain (BPS-17) again adjusted at GDC Essak Khel which is wrong. (Annex III)
- So kindly transfer me to GDC Essak Khel Lakki Marwat and oblige.

Thanks!

Dated: 12-03-2024

Yours's
Hidayat Ullah
Senior Librarian (BPS-18)
GDC S.K Bala Bannu

Attested
to be true copy
Rajha
Ad

GENERAL SECRETARY
DISTRICT BAR ASSOCIATION

بیسویں ٹریبونل صلح بنوں

مورخہ 16 مارچ 2016ء منجانب ایڈووکیٹ
مقدمہ بدلت اللہ ایڈووکیٹ
جرم بنام صوبائی حکومت
تھانہ

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقان مقام بنوں کیلئے
مقدمہ مندرجہ بالا عنوان بالا میں مقرر کردہ اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی
کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ تقرر ثالث و فیصلہ پر حلف دینے جو اب دہی اور اقبال دعویٰ اور بصورت
ڈگری کرانے اجراء اور وصولی چیک، روپیہ اور عرضی اور درخواست ہر قسم کی تصدیق زرا اس پر دستخط کرنے کا اختیار ہوگا۔ نیز
بصورت ڈگری کرانے اجراء اور وصولی چیک، روپیہ اور عرضی اور درخواست ہر قسم کی تصدیق زرا اس پر دستخط کرنے کا اختیار ہو
گا۔ نیز بصورت عدم پیروی یا ڈگری ایک طرفہ یا اپیل کی برآمدگی اور منسوخی دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے
کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے کسی اور وکیل یا مختیار قانونی کو اپنے ہمراہ یا
کوئی اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور بالا اختیارات حاصل ہوں گے اور اس کا ساختہ
و پرداختہ بھی منظور قبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ اس کے مستحق وکیل
صاحب موصوف ہوں گے۔ نیز بقایا و خرچہ کی وصولی کرنے کا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی مقام دورہ پر ہوا پیشی
سے باہر تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مقدمہ مذکور کریں۔ نیز اگر بھی وجہ مثلاً بیماری، معذوری، علالت وغیرہ
کی وجہ سے عارضی یا مستقبل پیروی مقدمہ نہ کریں تو بھی وکیل صاحب یا اس کے لواحقین کو بقایا فیس (اگر کوئی ہے) ادا
کرنے کا 1 کے پابند ہونگے اور ادا شدہ فیس کی واپسی کا تقاضہ کرنے کا حق نہیں ہوگا۔ مضمون وکالت نامہ سن اور سمجھ کر وکالت
نامہ لکھ دیا تاکہ سند رہے۔

Accepte ۲۰
attest of العبد

Adhkar
Ad

المرقوم
العبد
گواہ شدہ

بدلت اللہ خان ایڈووکیٹ

EMAIL: advocate5490@gmail.com

bc-10-3836 of Lower Court

Dated 17-03-1994

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