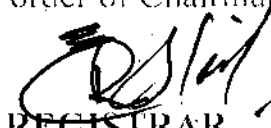


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

1016/2024

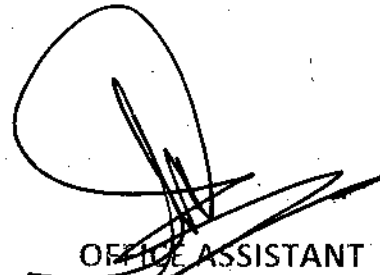
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/07/2024	<p>The appeal of Mr. Muhammad Tariq resubmitted today by Mr. Jehan Afsar Painsa Khel Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 25.07.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

This is an appeal filed by Mr. Muhammad Tariq today on 12.07.2024 against the order dated 13.06.2024 against which he preferred/made a departmental appeal on 20.06.2024 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 which is **premature** as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/counsel. The appellant would be at liberty to file fresh appeal after maturity of cause of action.

No. 357 /Inst./2024/KPST,

DI. 12/7 /2024.


OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.


Jehan Afsar Painsa Khel Adv.
High Court Peshawar.

⇒ Respected Sir,

Since the departmental appeal has properly been responded and implidely been rejected vide: order dated: 26-06-2024 passed by the respondent No. 3 and subsequently endorsed by the respondent No. 1 vide official order dated: 01-07-2024 with a copy given to the appellant.

Hence the appeal in hand is fully Matured and the appellant seeks redressal of his grievances in shap of setting aside both the impugned orders i.e. original as well as appellate order accordingly.

Requested to place it before the Honourable S.B for appropriate order please.


23-07-2024

**BEFORE THE HON'BLE CHAIRMAN SERVICES TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

C.M No. _____/2024
In Service Appeal No. 1016 /2024

Muhammad Tariq.....**Appellant**

V E R S U S

Director E&SE KPK & others.....**Respondents**

**APPLICATION FOR FIXATION OF TITLED
APPEAL BEFORE THE PRINCIPAL SEAT/BENCH
AT PESHAWAR**

Respected Sir,

- 1) That the appellant filed titled appeal before this Hon'ble Tribunal which is fixed for its proper hearing and no date of hearing is fixed yet.
- 2) That counsel for the appellant is a practicing lawyer at Peshawar therefore request to this Hon'ble Tribunal to fix the above titled appeal before the principal seat at Peshawar.

It is, therefore most humbly prayed that on acceptance of this application the appeal mentioned above may kindly be fixed before principal seat at Peshawar

Counsel for the Appellant



Jehan Afsar Painsa Khel
Advocate High Court

Dated 12.07.2024

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No: 1016 of 2024

Muhammad Tariq, Senior Clerk BPS-14, Govt. Girls Higher Secondary School, Dabli Lawaghar, District Karak (Presently at the disposal of District Education Officer (Male) Lakki Marwat).

Appellant

VERSUS

Director, Elementary & Secondary Education & others


Respondents

INDEX

S. No	Description of Documents	Annexures	Pages
1	Appeal along with affidavit		1-5
2	Addresses of Parties		06
3	Application for suspension of impugned order along with affidavit		07
4	True copy of posting order dated: 14-12-2023	A	08
5	True copy of impugned transfer order dated: 13-06-2024	B	09
6	True copy of departmental appeal	C	10
7	True copy of arrival report, letter dated: 26-06-2024 and impugned order dated: 01-07-2024	D-E	11-12
8	True copy of previous transfer/posting orders	F	13-20
9	Wakalat nama		21

Through

Appellant


Jehan Afsar Painsa Khel
Advocate High Court, Peshawar

Dated: 05/07/2024

①

**BEFORE KHYBER PAKHTUN KHWA, SERVICE TRIBUNAL,
PESHAWAR.**

Service Appeal No. 1016 /2024

Muhammad Tariq, Senior Clerk BPS-14, Govt. Girls Higher Secondary School, Dabli Lawaghar, District Karak (under instruction to perform at office of DEO. (Female) karak as Litigation Officer (Presently at the disposal of District Education Officer (Male) Lakki Marwat).

Appellant

VERSUS

1. Director

Directorate of Elementary & Secondary Education, Peshawar.

2. District Education Officer (Female), District Karak.

3. District Education Officer (Male), District Lakki Marwat.

Respondents

SERVICE APPEAL UNDER SECTION-4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED TRANSFER ORDER DATED: 13-06-2024 VIDE WHICH RESPONDENT No. 1 TRANSFERRED THE APPELLANT PREMATURELY AND AGAINST THEIR INACTION TO DECIDE THE APPEAL OF THE APPELLANT WITHIN STIPULATED TIME.

PRAYER:-

ON ACCEPTANCE OF THE INSTANT APPEAL THE IMPUGNED TRANSFER ORDER OF THE RESPONDENTS NO. 1 DATED: 13-06-2024 AND APPELLATE ORDER (IF ISSUED DURING PENDENCY OF INSTANT SERVICE APPEAL) MAY BE SET ASIDE AND THE APPELLANT MAY KINDLY BE RETAINED ON HIS POSITION OF SENIOR CLERK AT THE OFFICE OF DEO (FEMALE) KARAK OR AT GGHSS, DABLI LAWAGHAR DISTRICT KARAK.

(1-A)

BEFORE KHYBER PAKHTUN KHWA, SERVICE TRIABUNAL,
PESHAWAR

Service Appeal No. 1016 /2024

Muhammad Tariq, Senior Clerk BPS-14, Govt. Girls Higher Secondary School, Dabli Lawaghar, District Karak (under instruction to perform at office of DEO (Female) karak as Litigation Officer (Presently at the disposal of District Education Officer (Male) Lakki Marwat).

Appellant

VERSUS

1. Director

Directorate of Elementary & Secondary Education, Peshawar.

2. District Education Officer (Female), District Karak.

3. District Education Officer (Male), District Lakki Marwat.

Respondents

SERVICE APPEAL UNDER SECTION-4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED TRANSFER ORDER DATED: 13-06-2024 VIDE WHICH RESPONDENT No. 1 TRANSFERRED THE APPELLANT PREMATURELY AND AGAINST THE IMPUGNED ORDER DATED: 01-07-2024 VIC WHICH RESPONDENT INSTEAD OF DECIDING DEPARTMENTAL APPEAL IN CLEAR TERMS, DIRECTED THE RESPONDENT No. 3 TO ADJUST THE APPELLANT ON ANY POST.

PRAYER:-

ON ACCEPTANCE OF THE INSTANT APPEAL THE IMPUGNED TRANSFER ORDER OF THE RESPONDENTS NO. 1 DATED: 13-06-2024 AND APPELLATE ORDER DATED: 01-07-2024 MAY BE SET ASIDE AND THE APPELLANT MAY KINDLY BE RETAINED

ON HIS POSITION OF SENIOR CLERK AT THE OFFICE OF DEO (FEMALE) KARAK OR AT GGHSS, DABLI LAWAGHAR DISTRICT KARAK.

Respectfully Sheweth:

FACTS:-

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

1. That the appellant is working as Senior Clerk BPS-14 in Elementary and Secondary Education Department and was posted at District karak.

2. That appellant was posted as Senior Clerk at Govt. Girls Higher Secondary School, Dabli Lawaghar District Karak when on 14-12-2023 he was directed by the respondent No. 2 to perform his duties at the office of DEO (F) Karak with additional charge of Litigation Officer.

{True copy of order dated: 14-12-2023 is attached, as mark Annex-A}

3. That recently, appellant received impugned transfer order dated: 13-06-2024 from the office of respondent No. 1 vide which appellant was directed to approach office of respondent No. 3 for further posting at District Lakki Marwat.

{True copy of impugned order dated: 13-06-2024 is attached, as mark Annex-B}

4. That after receiving the impugned order, appellant moved departmental appeal to respondent No. 1 on 20-06-2024, wherein he agitated his frequent transfers and requested for withdrawal / cancellation of impugned order.

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

5. That needless to mention, appellant approached the office of respondent No. 3 with arrival report who informed the appellant that there is no vacant post of Senior Clerk under the control of his office in District Lakki Marwat. It would be relevant to mention that respondent No. 1 instead of making any clear order on departmental appeal of appellant, directed the respondent No. 3 through impugned order dated: 01-07-2024 to adjust the appellant on any post and in the same letter, respondent No.1 duly made copy of the said order to appellant with reference to his departmental appeal. Meaning thereby that there is no direct order upon departmental appeal of appellant, *but contents shows that the departmental appeal is impliedly rejected by respondent No. 1.*

{True copy of arrival report, letter dated: 26-06-2024 & impugned order dated: 01-07-2024 is attached, as mark Annex-D & E}

6. That being aggrieved from the impugned transfer order dated: 13-06-2024 and order dated: 01-07-2024, having no other adequate and efficacious remedy except the present service appeal.

GROUNDS:-

- A. Because the impugned order dated: 13-06-2024 issued by respondent No. 1 is against law, facts, hence liable to be set-aside.
- B. Because the respondent No. 1 in utter disregard to the principles of the fairness, merit and transparency passed the present impugned order dated: 13-06-2024, 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 appellant is made victim of frequent transfers which is evident from the transfers orders made within span of 2 years.
{True copy of previous transfer orders are attached, as mark Annex-F}
- E. 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 order detailed above is liable to be set at naught.
- F. Because appellant is transferred 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) but respondent No. 1 did not paid any attention to his genuine request, which is unwarranted.



- H. 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.
- I. 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.
- J. 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 orders are liable to be set aside, and the appellant may kindly be allowed to work on the post of Senior Clerk at the office of DEO (F), Karak or at GGHSS, Dabli Lawaghar, Karak.
- K. The appellant crave 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: 13-06-2024 of Respondent No. 1 and appellate order dated: 01-07-2024 as illegal, unlawful, without lawful authority and void ab initio by allowing the appellant to work on the post of Senior Clerk BPS-14 at the office of DEO (Female) Karak or at Govt. Girls Higher Secondary School, Dabli Lawaghar, Karak.
- ii. Any further better relief may also kindly be granted in the circumstances of the appellant's case.

Through

Appellant 

Jehan Afsar Painsa Khel
 Advocate High Court, Peshawar

Dated: 05/07/2024

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

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No: _____ of 2024

Muhammad Tariq, Senior Clerk BPS-14, Govt. Girls Higher Secondary School, Dabli Lawaghar, District Karak (under instruction to perform at office of DEO (Female) karak as Litigation Officer (Presently at the disposal of District Education Officer (Male) Lakki Marwat).

Appellant

VERSUS

Director, Elementary & Secondary Education & others

Respondents

AFFIDAVIT

I, **Muhammad Tariq**, Senior Clerk BPS-14, Govt. Girls Higher Secondary School, Dabli Lawaghar, District Karak (under instruction to perform at office of DEO (Female) karak as Litigation Officer (Presently at the disposal of District Education Officer (Male) Lakki Marwat), 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

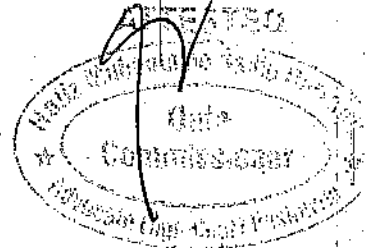


Jehan Afsar Painsa Khel
Advocate High Court.



Deponent

23 JUL 2024



6

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No: _____ of 2024

Muhammad Tariq, Senior Clerk BPS-14, Govt. Girls Higher Secondary School, Dabli Lawaghar, District Karak (under instruction to perform at office of DEO (Female) karak as Litigation Officer (Presently at the disposal of District Education Officer (Male) Lakki Marwat).

Appellant

VERSUS

Director, Elementary & Secondary Education & others

Respondents

MEMO OF ADDRESSES

Muhammad Tariq, Senior Clerk BPS-14, Govt. Girls Higher Secondary School, Dabli Lawaghar, District Karak (under instruction to perform at office of DEO (Female) karak as Litigation Officer (Presently at the disposal of District Education Officer (Male) Lakki Marwat).

Appellant

VERSUS

1. Director

Directorate of Elementary & Secondary Education, Peshawar.

2. District Education Officer (Female), District Karak.

3. District Education Officer (Male), District Lakki Marwat.

Respondents

Through

Appellant



Jehan Afsar Painsa Khel
Advocate High Court, Peshawar

Dated: 05/07/2024

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No: _____ of 2024

Muhammad Tariq, Senior Clerk BPS-14, Govt. Girls Higher Secondary School, Dabli Lawaghar, District Karak (under instruction to perform at office of DEO (Female) karak as Litigation Officer (Presently at the disposal of District Education Officer (Male) Lakki Marwat). _____ **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: 13-06-2024 & 01-07-2024 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: 13-06-2024 & 01-07-2024 and if the said orders are 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: 13-06-2024 & 01-07-2024 may kindly be suspended and status quo be maintained till final disposal of main service appeal.

Appellant

Through

Jehan Afsar Painsa Khel
Advocate High Court, Peshawar

Dated: 05/07/2024

AFFIDAVIT

I, Muhammad Tariq, Senior Clerk BPS-14, Govt. Girls Higher Secondary School, Dabli Lawaghar, District Karak (under instruction to perform at office of DEO (Female) karak as Litigation Officer (Presently at the disposal of District Education Officer (Male) Lakki Marwat), 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 Painsa Khel Advocate

25 JUL 2024
 DEPONENT
 ATTESTED
 JAHAN AFSAR PAINDA KHEL
 ADVOCATE HIGH COURT PESHAWAR

(8)

Annex - A



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)
KARAK

Phone: 0927-291177

Address : KDA

OFFICE ORDER

Mr. Muhammad Tariq Khan S/Clerk GGHSS Dabli Lawaghar is hereby directed to perform his duty at District Education Office (Female) Karak on additional charge of Litigation Officer on his own pay and BPS in the best interest of public service till further order.

- Note: - 1. Charge report should be submitted to all concerned.
2. No. TA/DA is allowed.

(DR. FANOOS JAMAL)
DISTRICT EDUCATION OFFICER
(FEMALE) KARAK.

Endst: No 1003-04 /

Dated Karak the 14 / 12 /2023.

Copy of the above for information to the:-s

1. Principal GGHSS Dabli Lawaghar.
2. District Accounts Office Karak.
3. District Monitoring Officer Karak
4. Official concerned.
5. Master file.

mf
DISTRICT EDUCATION OFFICER
(FEMALE) KARAK

J

(9)

Annex-B



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.
Phone: 091-9225344 Email: dhdmi.ecs@pmail.com

OFFICE ORDER

Consequent upon approval of the competent authority, the services of **Mr. Muhammad Tariq**, Senior Clerk-BPS-11, GGMSS Dabli Lawaghar, Karak are hereby placed at the disposal of District Education Officer (Male) Lakki Marwat for further adjustment.

Note:

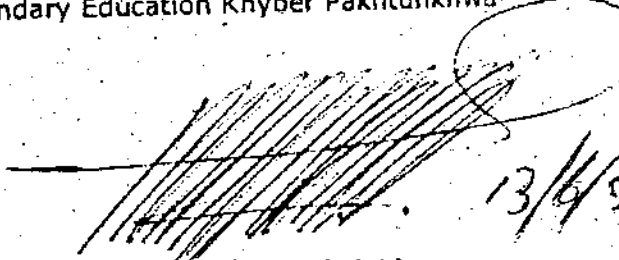
1. Compliance report should be submitted to all concerned.
2. No TA/DA is allowed.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. 8645-618 /F.No. A-23/MS/Transfer/Karak Vol-II
Dated Peshawar the 13-6-2024

Copy forwarded to the: -

1. District Accounts Officer, Concerned.
2. District Education Officer (Female) Karak.
3. District Education Officer (Male) Lakki Marwat.
4. Official concerned.
5. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
6. Master File.


13/6/24
Deputy Director (F&A)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

J

10

Amrullah - C

The Director,
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

Through District Education Officer
(Female) Karak.

Subject: APPEAL FOR REVIEW OF MY TRANSFER FROM GGSS DABLI
LAWAGHER / DEO (FEMALE) OFFICE KARAK AND REQUEST FOR
CANCELLATION OF ORDER NO:8645-48/A-23/MS/TRANSFER/KARAK
/VOL. DATED 13.6.2024.

Respected Madam,

I have been working as Senior Clerk in the office of the GGSS Dabli Lawagher w.e.f 05.12.2023 and also performing additional duty as a Legal Representative (Litigation) for Court Cases at DEO(Female) Office Karak under Endst: No.1003-04 dated 14.12.2023

I have been transferred from DEO (Female) Office Karak to GGSS Rehmat Abad Vide DEO (Female) Karak office endst: No:5008-09 dated 29.11.2022 On 30.11.2022. I was suddenly received my transfer order No.15-24 date 30.11.2022 showing me on the disposal of the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar. The Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar issued my posting to District Education Officer (Male) Karak for further adjustment. But the DEO (Male) Karak excused due to non-availability of post. The Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar further adjusted at SDEO (Male) Lachi Kohat under endst; No.6977-80/F.No./A-23/MS/G.File /2022 dated 12.01.2023. After one month 12 days once again I have been adjusted at DEO (Female) Office Karak vide Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar endst; No.3614-17/F.No./A-23/MS/G.File/2022 dated 24.2.2023.

R/Madam, I have been transferred to DEO (Male) Lakki Marwat vide Director E & S Education Peshawar.KPK under Endst; No. 8645-48/A-23/MS/Transfer /Karak Vol-II dated 13.6.2024, when I approached to DEO (Male) Lakki Marwat for adjustment /Charge assumption. He (DEO Male Lakki Marwat) stated that there is no vacant post available.

R/Madam, I have served with many Principals and in the office of DEO (Female) Karak with previous DEOs (Female) i.e Madam Zaib un Nisa, Madam Sabra Parveen, Madam Parveen Begum and Dr. Fanoos Jamal with their entire satisfaction.

Therefore, very humbly request you to kindly withdraw/Cancelled my transfer order and further retain my Services in the office of the Principal GGSS Dabli Lawagher (Karak) or District Education Officer (Female) Karak.

I shall be very thankful to you for this act of kindness.

Dated 20/6/2024.
C/No: 03339711006.

No. 3385 dt. 24/6/2024
The appeal based on fact, Honest and
efficient, hardworker Clerk.
Recommended for Cancellation
of order.
District Education Officer
(Female) Karak

Yours Sincerely

MUHAMMAD TARIQ
Senior Clerk
O/O the GGSS Dabli Lawagher
Karak

J

(16)

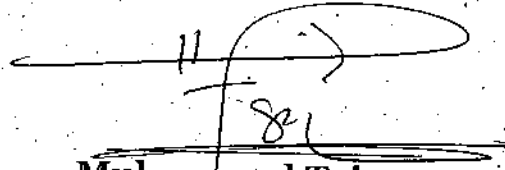
Annex-D

OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) LAKKI MARWAT.

ARRIVAL REPORT.

In compliance to the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar transfer order under Endst: No. 8645-48/A-23/MS /Transfer/ Karak Vol-II dated 13.6.2024, I beg to submit my arrival report of the Senior Clerk Post DEO(Male) Lakki Marwat today on 26-06-2024(A. N).

Dated: 26/6/2024.



Muhammad Tairq
Senior Clerk BPS-14
DEO (M) Lakki Marwat

Copy to the: -

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Account Office Lakki Marwat.

J



Office of The District Education Officer
Male Lakki Marwat

(117A)

Amr E

Ph: (0969)538291 email: emislakki@yahoo.com
www.facebook.com/deomalelakki, www.twitter.com/deo_m_lakki

No. 4004

Dated. 26 /06/2024

To


The Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

Subject: Transfer of Muhammad Tariq Senior Clerk GGHS Dabli Lawagher (Karak).

Memo:-

Reference to your office order issued vide No. 6845-48/A-23/MS/ Transfer /Karak Vol-II dated. 13-06-2024, and to state that Muhammad Tariq Senior Clerk approached the undersigned for assumption of charge, but unfortunately there is no vacant post of Senior Clerk BPS-14 under the control of this office in District Lakki Marwat.

Hence it is requested that the above named Senior Clerk may be adjusted anywhere else in province.


26/6/2024
District Education Officer
(Male) Lakki Marwat

J



12

Akrona - F

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.**

No. 3200 /F.No. 1/A-23/MS/Transfer/Karak/Vol-II

Dated Peshawar the 01-07 /2024

Phone: 091-9225344

Email: ddadmn.ese@gmail.com

To

The District Education Officer
(Male) Lakki Marwa.

Subject: **TRANSFER OF MUHAMMAD TARIQ SENIOR CLERK GGHSS DABLI
LAWAGHAR (KARAK)**

Memo:

I am directed to refer to your Office letter No. 4004 dated 26/06/2024 on the subject cited above in respect of **Mr. Muhammad Tariq**, Senior Clerk BPS-14 regarding the subject matter.

You are therefore directed to adjust him against any vacant post of stenographer/any other equivalent post.

Deputy Director (F&A)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst; No. 3201-3

Copy forwarded to the: -

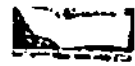
1. **Mr. Muhammad Tariq**, Senior Clerk BPS-14, with reference to his appeal received vide this Office diary No. 1241 dated 24/06/2024.
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Master File.

Deputy Director (F&A)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

1.2
2024

J

District Education Office (Female) District Karak



Notification:

The services of the following two ministerial staff are hereby placed at the disposal of directorate of E&SED Peshawar on administrative ground with immediate effect in the interest of public service. The details are as under:

SNO	Name	Designation	Present Posting	Services Placed	Action
1	Mr. Mohammad Tariq	Senior Clerk	DEO(f) Karak	Directorate Of E&SED	Immediately
2	Mr. Asad Ullah	Dispatcher	DEO(f) Karak	do	do

Arrival reports should be submitted to the Directorate Of E&SED Peshawar with immediate effect.

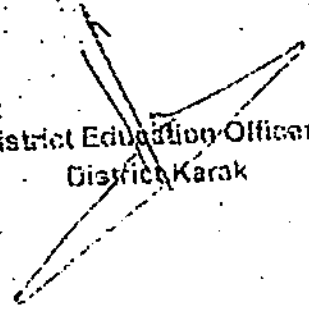
Dr. Fannos Jamal
District Education Officer (f)
District Karak.

Dated: 30/11/2022

Encl: No. 15-24

- Copy to:
- 1 Deputy Commissioner Karak.
 - 2 District Account Officer Karak.
 - 3 District Finance Office Karak.
 - 4 Additional Deputy Commissioner Karak.
 - 5 PS to Secretary
 - 6 PS to Special Secretary Establishment E&SED Peshawar.
 - 7 PS to Director E&SED Peshawar KPK.
 - 8 PA to Additional Secretary Litigation ESSED Peshawar

District Education Officer (f)
District Karak



ADDE (PA/YS)

J



**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.**

Phone: 091-9225344.

Email: ddadmn.es@gmail.com

OFFICE ORDER

The Posting/Transfer in r/o the following Ministerial Staff is hereby ordered on their own pay & BPS in the interest of public service with immediate effect:

S. #	Name/Design:	Present Posting	Adjusted at	Remarks
1	Mr. Muhammad Tariq Senior Clerk	Service placed at the disposal of Directorate of E&SE KPK Peshawar	Service placed at the disposal DEO (M) Karak for further adjustment	
2	Mr. Asad Ullah Dispatcher	Service placed at the disposal of Directorate of E&SE KPK Peshawar	Service placed at the disposal DEO (M) Karak for further adjustment	

Note:-

1. Compliance report should be submitted to all concerned.
2. No TA/DA etc is allowed.

DIRECTOR

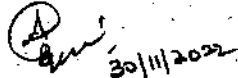
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. 3408-11 F.No. /A-23/MS/G.File/2022

Dated 30/11/2022

Copy forwarded to the:-

1. District Education Officer (Male) Karak.
- ✓ 2. District Education Officer (Female) Karak w/r to her letter No. 15-24 dated 30/11/2022.
3. District Accounts Officer Concerned
4. Officials concerned.
5. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
6. Master File.


Assistant Director (Admin)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar



(15)

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) KARAK**

Address :- KDA Karak

No. 5744 / Transfer of clerks

Dated Karak the 20 / 12 / 2022

To,

The Director,
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar.

**SUBJECT: OFFICE ORDER NO. 3408-11/F.NO./A-23/MS/G.FILE/2022
DATED 30/11/2022**

Memo:

Reference to your good office order no. & dated cited above regarding posting/Transfer of Ministerial staff. it is stated for your kind information that there is no vacant post of Senior Clerk & Dispatcher under the control of undersigned in district Karak for the adjustment of Mr. Muhammad Tariq, Senior Clerk & Mr. Asad Ullah, Dispatcher.

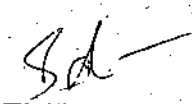
So, In view of the above it is requested to adjust them in any other office under your kind authority, Please.


**DISTRICT EDUCATION OFFICER
(MALE) KARAK**

Endst.No. _____

Copy to the:-

1. District Education Officer Female Karak for information.
2. District Accounts Officer Karak.
3. Officials concerned.
4. Master file.


**DISTRICT EDUCATION OFFICER
(MALE) KARAK**



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**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.**
Phone: 091-9225344 Email: ddadmn.cse@gmail.com

OFFICE ORDER

Mr. Muhammad Tariq Senior Clerk BPS-14, office of the District Education Officer (Female) Karak is hereby transferred/adjusted against the vacant post of Senior Clerk BPS-14 at SDEO (M) Lachai Kohat in his own pay and BPS in the interest of public service with effect from the date of his taking over charge.

Note:

1. Charge report should be submitted to all concerned.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. 6977-20 /F.No./A-23/MS/G.File/2022

Dated Peshawar the 12/01 /2023

Copy forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar/District Accounts Officer Concerned.
2. District Education Officer (Female) Karak.
3. District Education Officer (Male) Kohat.
4. SDEO concerned.
5. Official concerned.
6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
7. Master File.

Assistant Director (Admn)
Directorate of Elementary & Secy. Education
Khyber Pakhtunkhwa Peshawar

12/1/23

J



(17)

**DIRECTORATE OF ELEMENTARY & SECONDARY
EDUCATION**
KHYBER PAKHTUNKHWA PESHAWAR.
Phone: 091-9225344 Email: ddadm.ess@gmail.com

CANCELLATION

The Office order issued under Endst: No.3408-11 dated 30/11/2022 and No.6977-80 dated 12/1/2023 in r/o Muhammad Tariq S/Clerk of DEO (F) Karak is hereby **withdrawn**.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. 3614-17 /F.No./A-23/MS/G. File/2022 Dated 24/12/2023
Copy forwarded to the: -

1. District Education Officer (Male/Female) Karak.
2. District Education Officer (M) Kohat
3. SDEO (M) Lachi Kohat.
4. Official Concerned.
5. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
6. Master file.

Assistant Director (Admn)
Directorate of Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

24/12/23

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OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) KARAK

TRANSFER/ADJUSTMENT ORDER

Transfer of the following Senior Clerks is hereby ordered on their own pay and BPS with effect from the date of taking over charge in the best interest of public service service.

S.No	Name & Designation	From	To	Remarks
1.	Mr Tariq Khan S/C	DEO (F) Karak	SDEO (F) Karak	V.N No 3
2.	Mr Wasiullah S/C	GGHSS Rehmat Abad	DEO Female Karak	V.N No 1
3	Mr Ghani Khan S/C	SDEO (F) Karak	GGHS Rehmat Abad	V.N No 2

Note: 1. Charge report should to all concerned
2. No TA/DA is allowed.

Encls: No. 4592-54

Copy of the above for information to the:-

1. Director Elementary & Secondary Khyber Pakhtun Khawa Peshawar.
2. SDEO Female Karak
3. Principal concerned
4. District Account Officer Karak
5. Official Concerned
6. Master File

District Education Officer
(Female) Karak

Dated Karak the 10/09/2023.

18/9/23

District Education Officer
(Female) Karak

10/9/23

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OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE KARAK.

TRANSFER ORDER.

The transfer of the following clerks school/office noted against each is hereby ordered in the interest of public service with immediate effect.

S.No.	Name & Designation	From	To	Remarks
01.	Mr, Asmat ullah S/Clerk	DEO (F) Karak	GGHSS Essak Chuntra	Vice S.No.02
02.	Mr, Muhammad Tariq S/Clerk	GGHSS Essak Chuntra	DEO (F) Karak	Vice S.No.01

Note: Charge reports should be submitted to all concerned.

~~DISTRICT EDUCATION OFFICER
FEMALE KARAK.~~

Endst; No

8639-41

Dated

17, 8 /2023.

Copy to the:-

1. PA to Director Elementary & Secondary Education KPK Peshawar.
2. District Accounts Officer Karak.
3. Principal GGHSS Essak Chuntra karak.
4. Official concerned.

~~DISTRICT EDUCATION OFFICER
FEMALE KARAK.~~

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OFFICE OF THE DISTRICT EDUCATION
OFFICER (FEMALE) KARAK.

Address: KDA KARAK

Phone: 0927-291177

Email: emiskarak@yahoo.com

TRANSFER.

Transfer/Adjustment of the following S/Clerk are hereby ordered on their own pay and grade in the school/ offices noted against each with immediate effect in the best interest of public service.

S #	Name & Designation	From	To	Remarks.
1	Muhammad Tariq S/C	DEO (Female) Karak	GGHSS Dabli Lawagher	New Created Post
2.	Abid UR Rehman S/C Working against wrong Post as S.Temo BPS 14	DEO (Female) Karak	DEO (Female) Karak	V.S.No.1

- Note: 1. Charge report should be submitted to all concerned.
2. No TA/DA is allowed.

DISTRICT EDUCATION OFFICER
(FEMALE) KARAK.





Dated Karak the 5/12/2023

Ends: No. 4889/92 / F.No.1/Vol-1/Transfer/

Copy to the:

1. Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Principal GGHSS Dabli Lawagher.
3. District Accounts Officer Karak.
4. B&AO Local office.
6. Office copy.

DISTRICT EDUCATION OFFICER
(FEMALE) KARAK.

قیمت 50 روپے	48079	پشاور بار ایسوسی ایشن، خیبر پختونخواہ	
ایڈوکیٹ: 			
بار کونسل ایسوسی ایشن نمبر: bc-09-1646			
رابطہ نمبر: 0333-9433554			

بعدالت جناب: چیئر مین سروس ٹریبونل خیبر پختونخوا پشاور

مخاتب: ایبلانٹ	دعویٰ:
	علت نمبر:
محمد طارق بنام ڈائریکٹر ایجوکیشن و تعلیم	مورخہ:
(ایبلانٹ) (ریسپانڈنٹس)	جرم:
	تھانہ:

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ آن مقام پشاور کیلئے جہان افسر ماہندہ خلیل اینڈ مہمدا فتحیار 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 تقریر نمائش 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 برائگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار 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 ساتھ پر راختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جائے 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 مندر ہے

المرقوم: 1/20

العواہد العواہد العواہد
پشاور مقام کے لئے منظور ہے۔

Attested by




نوٹ: اس وکالت نامہ کی ذمہ داری ناقابل قبول ہوگی۔

محمد طارق ولد ظریف خان سکندری خورہ کرک (ایبلانٹ)

