

**IN THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

In Re: Service Appeal No. 1195/2024

Zakir Ullah
Superintendent Office of the SDO (M) Town-II Peshawar.

.....Appellant

Versus

**Government of Khyber Pakhtunkhwa, through Chief Secretary
Peshawar and 3 others etc.**

.....Respondents

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Deponent

11

**IN THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

In Re: Service Appeal No. 1195/ 2024

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 15313

Dated 30/8/24

Zakir Ullah

Superintendent Office of the SDO (M) Town-II Peshawar.

.....Appellant

Versus

**Government of Khyber Pakhtunkhwa, through Chief Secretary
Peshawar and 3 others.**

.....Respondents

**PARAWISE COMMENTS ON BEHALF OF
RESPONDENT NO .4**

Respectfully Sheweth,

Preliminary Objections:

The Respondent humbly submit as under:

1. That the Appellant has no cause of action or locus standi.
2. That the Appellant has not come to the Tribunal with clean hands.
3. That the instant Appeal is not maintainable in its present form.
4. That the Appellant has filed the instant Appeal with malafide intention.
5. That the Appellant is estopped to file the instant Appeal by his own conduct.

ON FACTS:

1. Para-I relates to Appellant and may need verification.
2. As per para-I above.
3. Para-3 pertains to record.
4. Para- 4 relates to Respondent -2.

- (2)
5. Para-5 does not relate to the replying respondent.
 6. Most of the para-6 relates to Respondent-2. However, it may be pertinent to mention here that the replying respondent was posted in SDEO (Female) Town -I since 29.08.2022 on the post of Superintendent. On 15.03.2024 vide Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department No. SO(S/M) E&SED 5-17 /2024/PT/SS Secretary, the replying respondent was transferred to District Education Office (Female) Peshawar. During performance of duties at DEO (Female) Peshawar office, being a female, the replying respondent faced a lot of difficulties as the seat of Superintendent at DEO (Female) Peshawar was very heavy seat and only male Superintendent can easily operate and manage it due to a lot of male public dealings. For the foregoing reasons the replying respondent requested the Respondent-3 who was posted in SDEO (Female) Town -I for mutual transfer application, resultantly mutual transfer order was issued by the Secretary Elementary and Secondary Education Department vide Notification No. SO(SM) E&SED 5-17/2024 dated 23.07.2024. The replying respondent was unaware about the transfer case of the Appellant (Superintendent Male) and has nothing to do it with it. Moreover, SDEO (Female) Town-I being a lighter station can be easily managed by a female i.e., the replying respondent as compared to the DEO (Female) Peshawar office for the reasons mentioned above. Furthermore, being a female, transfer of the replying respondent is impossible to SDEO (Male) Town-II. It is, therefore, requested that the replying respondent may be retained at SDEO (Female) Town-I Peshawar on humanitarian grounds also.

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Copy of Order dated 30.08.2022 is attached as Annex-A

Copy of Order dated 15.03.2024 is attached as Annex-B

Copy of Order dated 23.07.2024 is attached as Annex-C

7. Para-7 does not relate to the replying respondent.

ON GROUNDS:

A. In reply to Ground-A it is submitted that the impugned notifications have been issued in accordance with law. Rest has been discussed in detail in Para-6 of the Facts above.

B. As per Ground-A.

C. As per Ground-A.

D. As per Ground-A.

E. As per Ground-A.

F. As per Ground-A.

G. The respondent may be allowed to raise additional grounds

at time hearing of the case with the kind permission of the honourable Tribunal.

H. As per Ground-G.

Prayer:

It is therefore, prayed in the interest of justice that the honourable Tribunal may kindly dismiss the Appeal with costs.


(Respondent No. 4)
(In Person)

'A' (4)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the August 29, 2022

NOTIFICATION

NO.SO(S/M)E&SED/5-17/2022/Promotion from Assistant (BS-16) to Superintendent (BS-17): Consequent upon their promotion from Assistant (BS-16) to Superintendents (BS-17) as notified vide this Department's Notification No. SO(PE)/ E&SED/2-6/DPC Meeting/Promotion of Supdt./2022 dated 27.06.2022, following posting/transfers of Superintendents (BS-17) are hereby ordered, in the public interest with immediate effect:-

| S# | Name of Officer | From | To | Remarks |
|-----|-------------------------|------------------------------|----------------------------|---------------|
| 1. | Mr. Ghulam Muhammad | GGHSS Kalanga Khyber | DEO Khyber | A.V.P |
| 2. | Mr. Muhammad Tariq | SDEO (M) Abbottabad | DCTE Abbottabad | A.V.P |
| 3. | Mr. Ghafoor Shah | Directorate of E&SE | DEO (F) Charsadda | A.V.P |
| 4. | Mr. Farid Khan | Directorate of E&SE Peshawar | Directorate of NMD | Vice S.No. 19 |
| 5. | Mr. Mian Sher Shah | DEO (M) Nowshera | DEO (M) Torghar | A.V.P |
| 6. | Mr. Mukhtaj Nabi | SDEO (F) Topi Swabi | DEO (M) Haripur | A.V.P |
| 7. | Mr. Muhammad Khalid | RPDC (M) Haripur | SDEO (F) Haripur | A.V.P |
| 8. | Mr. Muhammad Ajmal | SDEO (F) Oghi Mansehra | SDEO (F) Mansehra | A.V.P |
| 9. | Mr. Muhammad Shabir Ali | SDEO (F) Swabi | SDEO (F) Lahor Swabi | A.V.P |
| 10. | Mr. Naqib Ahmad | DEO (F) Mardan | SDEO (F) Takht Bhai Mardan | A.V.P |
| 11. | Mr. Jan Muhammad | DEO (M) Nowshera | SDEO (M) Nowshera | A.V.P |
| 12. | Mr. Shah Alam Khan | SDEO (F) Lakki Marwat | SDEO (F) Lakki Marwat | A.V.P |
| 13. | Mr. Siraj ul Haq | SDEO (F) Lal Qila Dir Lower | DEO (M) Dir Lower | A.V.P |
| 14. | Mr. Sher Alam | DEO (M) Charsadda | DEO (M) Charsadda | A.V.P |
| 15. | Mr. Sajid Ullah | DEO (F) Peshawar | DEO (M) Peshawar | A.V.P |

ATTESTED

| | | | | |
|-----|-------------------------|---------------------------------|------------------------------|-------|
| 16. | Mr. Abdul Ghafoor | DEO (F) Kohat | DEO (F) Kohat | A.V.P |
| 17. | Mr. Muhammad Naeem Khan | SDEO(F) Havelia Abbottabad | DEO (F) Battagram | A.V.P |
| 18. | Mr. Abdus Salam | SDEO (M) Dir Lower at Timergara | DEO (M) Dir Lower | A.V.P |
| 19. | Mr. Muhammad Tahir | DEO (F) Shangla | DEO (M) Shangla | A.V.P |
| 20. | Mr. Naeem Gul | DEO (M) Abbottabad | SDEO (F) Abbottabad | A.V.P |
| 21. | Mr. Waqas Shah | DEO (F) Kohat | SDEO (F) Kohat | A.V.P |
| 22. | Mr. Tariq Shah | DEO (F) Abbottabad | DEO (M) Abbottabad | A.V.P |
| 23. | Mr. Said Jehan | DEO (M) Shangla | DDEO (M) Swat Upper | A.V.P |
| 24. | Mr. Ubaid ur Rehman | DEO (M) Buner | SDEO (M) Dagar Buner | A.V.P |
| 25. | Mr. Nisar Ahmad | DEO (F) Buner | DEO (F) Buner | A.V.P |
| 26. | Mr. Ijaz Khan | GHSS Comprehensive, Bannu | SDEO (M) Bannu | A.V.P |
| 27. | Mr. Shahid ud Din | SDEO (M) Samar Bagh Dir Lower | SDEO (M) Timergara Dir Lower | A.V.P |
| 28. | Mr. Nazir Ahmad | DEO (M) Shangla | DEO (F) Shangla | A.V.P |
| 29. | Mr. Sardar Hussain | DEO (F) Shangla | SDEO (F) Shangla | A.V.P |
| 30. | Mr. Said Anwar Ali | SDEO (M) Shangla | SDEO (M) Shangla | A.V.P |
| 31. | Mr. Fazal Ghafar | SDEO (F) Shangla | DEO (M) Shangla | A.V.P |
| 32. | Mr. Sher Malik | DEO (M) Shangla | DEO (M) Kohistan Upper | A.V.P |
| 33. | Mr. Said Ameer | DEO (F) Kohistan | DEO (F) Kohistan Lower | A.V.P |
| 34. | Mr. Muhammad Ibrahim | DEO (M) Mardan | SDEO (F) Mardan | A.V.P |
| 35. | Mr. Tahir Sartaj | DEO (M) Mardan | SDEO (F) Dargai Malakand | A.V.P |
| 36. | Mr. Abdul Wadood Jan | SDEO (F) Samar Bagh Dir Lower | SDEO (F) Samarbagh Dir Lower | A.V.P |
| 37. | Mr. Muhammad Iqbal | DEO (M) Dir Lower | DEO (M) Upper Chitral | A.V.P |
| 38. | Mr. Faizul Haq | SDEO (M) Lal Qilla Dir Lower | DEO (M) Bajaur | A.V.P |
| 39. | Mr. Fazli Wahid | DEO (M) Swabi | DEO (M) Swabi | A.V.P |
| 40. | Mr. Jehan Bakht Said | SDEO (F) Dir Lower | SDEO (M) Babuzai Lower Swat | A.V.P |
| 41. | Mr. Muhammad Idrees | DEO (M) Nowshera | DEO (M) Nowshera | A.V.P |

ATTESTED

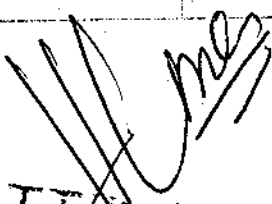
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|-----|---------------------------|-------------------------------|--------------------------|-------|
| 42. | Mr. Badshah Muhammad | SDEO (F) Malakand | SDEO (M) Malakand | A.V.P |
| 43. | Mr. Imdad Ullah | SDEO (M) Town-II Peshawar | SDEO (M) Batiagram | A.V.P |
| 44. | Mr. Badshah ul Haq | SDEO (M) Samar Bagh Dir Lower | DEO (M) Kohistan Upper | A.V.P |
| 45. | Mr. Anwar Khan | SDEO (M) Munda Dir Lower | DEO (M) Kohistan Lower | A.V.P |
| 46. | Mr. Muhammad Dawood Shah | SDEO (M) Dir Upper | SDEO (M) Dir Upper | A.V.P |
| 47. | Mr. Muhammad Ibrar | DEO (M) Nowshera | SDEO (F) Bannu | A.V.P |
| 48. | Mr. Naeem Khan | DEO (F) Malakand | DEO (M) Malakand | A.V.P |
| 49. | Mr. Gul Wali Khan | DEO (F) Nowshera | SDEO (F) Nowshera | A.V.P |
| 50. | Mr. Pir Bakhsh | SDEO (F) Nowshera | DEO (M) Torghar | A.V.P |
| 51. | Mr. Mahmood Khan | DEO (F) Nowshera | SDEO (F) Dir Upper | A.V.P |
| 52. | Mr. Mujahid Khan | SDEO (F) Khall Dir Lower | SDEO (F) Upper Kohistan | A.V.P |
| 53. | Mr. Muhammad Manzoor Khan | DEO (M) Chitral | SDEO (M) Chitral Lower | A.V.P |
| 54. | Mr. Hakim Shah | DEO (F) Chitral | SDEO (F) Chitral Lower | A.V.P |
| 55. | Mr. Fateh Muhammad | DEO (M) Dir Lower | DEO (M) Dir Upper | A.V.P |
| 56. | Mr. Aminullah Khan | SDEO (M) Warai Dir Upper | SDEO (M) Warai Dir Upper | A.V.P |
| 57. | Mr. Zahir Rahman | SDEO (F) Dir Upper | DEO (M) Dir Upper | A.V.P |
| 58. | Mr. Hazrat Wahab | SDEO (F) Warai Dir Upper | DEO (F) Upper Chitral | A.V.P |
| 59. | Mr. Umer Ayaz Khan | DEO (M) Bannu | DEO (M) Bannu | A.V.P |
| 60. | Mr. Abdul Shabbir | DEO (F) Haripur | DEO (F) Haripur | A.V.P |
| 61. | Mr. Muhammad Ajmal Khan | SDEO (M) Topi Swabi | SDEO (M) Topi Swabi | A.V.P |
| 62. | Mr. Sabz Ali Khan | DEO (F) Swabi | DEO (F) Swabi | A.V.P |
| 63. | Mr. Haleem Jan | DEO (M) Swabi | DEO (M) Swabi | A.V.P |
| 64. | Mr. Bashir Ahmad | DEO (M) Tank | DEO (F) Torghar | A.V.P |
| 65. | Mr. Ibrarullah Hashmi | SDEO (M) Tank | DEO (M) Tank | A.V.P |


ATTESTED

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|-----|-------------------------------|------------------------------|---|-------|
| 66. | Mr. Ihsan Ullah | SDEO (F) Parova D.I Khan | SDEO (F) Prova D.I Khan | A.V.P |
| 67. | Mr. Haroon Khan | DEO (F) Dir Upper | DEO (M) Battagram | A.V.P |
| 68. | Mr. Anwar Khan | SDEO (M) Hangu | SDEO (M) Hangu | A.V.P |
| 69. | Mr. Javid Iqbal | DEO (M) Buner | DEO (F) Buner | A.V.P |
| 70. | Mr. Iftikhar Nadeem | DEO (F) Buner | DEO (M) Battagram | A.V.P |
| 71. | Mr. Sar Anjam Khan | DEO (M) Buner | SDEO (F) Aliy Battagram | A.V.P |
| 72. | Mr. Saeed Ahmad | SDEO (M) Kulachi D.I Khan | DEO (M) D.I Khan | A.V.P |
| 73. | Mr. Shoaib Sultan | SDEO (M) D.I Khan | SDEO (M) D.I Khan | A.V.P |
| 74. | Mr. Haq Nawaz | SDEO (F) Kulachi D.I Khan | SDEO (F) D.I Khan | A.V.P |
| 75. | Mr. Zakir Ullah | SDEO (M) Topi Swabi | SDEO (M) Swabi | A.V.P |
| 76. | Mr. Amir Ullah | DEO (F) Charsadda | DEO (M) Charsadda | A.V.P |
| 77. | Mr. Wazir Shah | DEO (F) Charsadda | SDEO (F) Charsadda | A.V.P |
| 78. | Mr. Nizar Khan | SDEO (F) Charsadda | DEO (F) Bannu | A.V.P |
| 79. | Mr. Abdul Bari | Directorate of E&SE | Directorate of E&SE Peshawar | A.V.P |
| 80. | Mr. Farooq Ahmad | Directorate of NMD | Directorate of NMD | A.V.P |
| 81. | Mr. Muhammad Yasir Jillani | DEO (M) Peshawar | SDEO (M) Mastuj Upper Chitral | A.V.P |
| 82. | Mr. Imran Ullah | DEO (M) Bannu | DEO (M) Bannu | A.V.P |
| 83. | Mr. Azhar Uddin | DEO (M) Bannu | DEO (F) Chitral Lower | A.V.P |
| 84. | Mr. Muhammad Ayaz | Directorate of E&SE | SDEO (M) Dasu Kohistan | A.V.P |
| 85. | Mr. Fazle Rehman | SDEO (M) Katlang Mardan | Assistant Director (BS- 17) DPD Peshawar | A.V.P |
| 86. | Mr. Amir Ullah | Directorate of E&SE | Directorate of E&SE Peshawar | A.V.P |
| 87. | Mr. Shah Fahad Afridi | Directorate E&SE | Directorate of E&SE Peshawar | A.V.P |
| 88. | Mr. Muhammad Naveed | DEO (M) Malakand | DEO (M) Malakand | A.V.P |
| 89. | Syed Mohsin Ali | DEO (M) Buner | DEO (M) Buner | A.V.P |


ATTESTED

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|------|-------------------------|------------------------------|--------------------------------|--|
| 90. | Mr. Hashmat Abbas | DEO (M) Karak | SDEO (M) Karak | A.V.P |
| 91. | Mr. Shakir Naeem | SDEO (F) Baffa Mansehra | DEO (M) Mansehra | A.V.P |
| 92. | Mr. Farhan Farid | Directorate of E&SE | DEO (M) Tank | A.V.P |
| 93. | Mr. Adnan Hussain | DEO (M) Malakand | DEO (M) Malakand | A.V.P |
| 94. | Mr. Muhammad Khalid | DEO (M) Karak | DEO (M) Karak | A.V.P |
| 95. | Mr. Waleed Safdar | DEO (F) Kohat | DEO (M) Kohat | A.V.P |
| 96. | Mst. Huma Nisar | SDEO (F) Town-II Peshawar | SDEO (F) Town-I Peshawar |  SDEO (F) Town-I Peshawar |
| 97. | Mr. Jousha Mehboob | Directorate of E&SE Peshawar | Directorate of E&SE Peshawar | Town-I Peshawar |
| 98. | Mr. Anif Iqbal | DEO (F) Lakki Marwat | DEO (F) Lakki Marwat | A.V.P |
| 99. | Mr. Murtaza Khan | Directorate of E&SE | DEO (M) Lower Swat | A.V.P |
| 100. | Mr. Amjad Ali | RPDC (F) Charsadda | DEO (M) Kolai Palas Kohistan | A.V.P |
| 101. | Mr. Wajid Ali | SDEO (F) Charsadda | DEO (F) Kolai Palas Kohistan | A.V.P |
| 102. | M: Muhammad Islam | DEO (M) Charsadda | DEO (M) Mohmand | A.V.P |
| 103. | Mr. Sher Alam | DEO (M) Karak | DEO (F) Karak | A.V.P |
| 104. | Mr. Habib ur Rehman | SDEO (M) Karak | DEO (M) Karak | A.V.P |
| 105. | Mr. Atiq Ullah | DEO (F) Karak | SDEO (M) Banda Daud Shah Karak | A.V.P |
| 106. | Mr. Luqman Gul | SDEO (F) Karak | SDEO (F) Karak | A.V.P |
| 107. | Mr. Muhammad Yahya | Directorate of E&SE | DEO (F) Hangu | A.V.P |
| 108. | Mr. Hashmat Khan | DEO (M) Hangu | DEO Orakzai | A.V.P |
| 109. | Mr. Muhammad Siraj | DEO (M) Hangu | DEO (M) Hangu | A.V.P |
| 110. | Mr. Muhammad Khalid | SDEO (F) Gari Kapoora Mardan | DDEO (F) Swat Upper | A.V.P |
| 111. | Mr. Muhammad Nisar Khan | SDEO (F) Hangu | DEO (F) Hangu | A.V.P |
| 112. | Mr. Bakht Ali Khan | SDEO (M) Banda Daud Shah | SDEO (F) Banda Daud Shah | A.V.P |
| 113. | Mr. Akhtar Munir | DEO (M) Lakki Marwat | DEO (F) Tank | A.V.P |


ATTESTED

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| | | | | |
|------|--------------------|-----------------------|-------------------------------|-------|
| 114. | Mr. Qasim Khan | DEO (M) Lakki Marwat | DEO (M) Lakki Marwat | A.V.P |
| 115. | Mr. Rahim Dil Khan | SDEO (M) Lakki Marwat | SDEO (M) Lakki Marwat | A.V.P |
| 116. | Mr. Hidayat Ullah | SDEO (F) Lakki Marwat | DEO (M) Lakki Marwat | A.V.P |
| 117. | Mr. Irshad Ali | DCTE Abbottabad | SDEO (M) Jodba Torghar | A.V.P |
| 118. | Mr. Majid Ullah | SDEO (F) Dir Upper | SDEO (F) Mastuj Upper Chitral | A.V.P |

Consequential Posting/Transfers

| | | | | |
|------|-----------------|--|---------------------------|-------|
| 119. | Mr. Sandal Khan | Directorate of NMDs Khyber Pakhtunkhwa | SDEO (M) Town-II Peshawar | A.V.P |
|------|-----------------|--|---------------------------|-------|

SECRETARY E&SE DEPARTMENT

Endst. of even No. & Date

1. Accountant General, Khyber Pakhtunkhwa, Peshawar
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar
3. Director, DPID, Khyber Pakhtunkhwa, Peshawar
4. Director, DCTE Abbottabad.
5. District Education Officers Male, Concerned
6. District Accounts Officers Concerned
7. PS to Secretary E&SE Department, Khyber Pakhtunkhwa
8. Incharge EMIS E&SE Department
9. Officers concerned
10. Office order file

Baqir Ali
29/08/2022

(BAQIR ALI)

SECTION OFFICER (SCHOOLS MALE)


S.D.E.O (F)
Town-I Peshawar

ATTESTED

'B' 10.

Annex-B



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223633 Email: sschoolmale@gmail.com

Peshawar, Dated: 15.03.2024

NOTIFICATION

NO.SO/S/DE&SED/5-17/2024/PT/SS: Mst. Huma Nisar currently working as Superintendent (BS-17) is hereby transferred from Sub- Divisional Education Office, Town-I Peshawar and posted at DEO (F) against the vacant post of Superintendent (BS-17), with immediate effect, in the best public interest.

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

1. Directorate of E&SE Department.
2. District Education Officer (F) Peshawar.
3. District Accounts Officer Peshawar.
4. Sub- Divisional Education Office, Town-I Peshawar
5. PS to Secretary E&SE Department.
6. Officer Concerned.

SCHOOLS MALE SECTION
(Muhammad Ishaq) 15/3/24
SECTION OFFICER (SCHOOLS MALE)
ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-8223533 Email: sschoolmale@gmail.com



Dated: 23.07.2024

NOTIFICATION

NO.SO(SM)E&SED/5-17/2024/: The following mutual transfer/posting is hereby ordered with immediate effect, in public interest:-

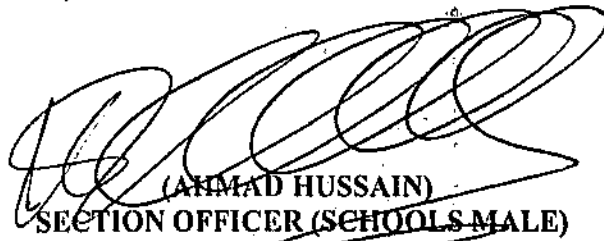
| S. No. | Name | Designation | From | To | Remarks |
|--------|------------------|------------------------|------------------------------|------------------------------|----------------|
| 1. | Mr. Marifat Shah | Superintendent (BS-17) | o/o SDEO (F) Town-I Peshawar | o/o DEO (F) Peshawar | Vice Sr. No. 2 |
| 2. | Mr. Huma Nisar | Superintendent (BS-17) | o/o DEO (F) Peshawar | o/o SDEO (F) Town-I Peshawar | Vice Sr. No. 1 |

SECRETARY TO
GOVT OF KHYBER PAKHTUNKHWA
E&SED

Endst: of even No. & Date

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director, EMIS E&SE Department.
4. District Education Officer (M) Concerned.
5. District Accounts Officer Concerned.
6. PA to Deputy Secretary (Estab) E&SE Department.
7. Officer Concerned.
8. Office order file.


(AHMAD HUSSAIN)
SECTION OFFICER (SCHOOLS MALE)


ATTESTED

12

**IN THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

In Re: Service Appeal No. 1195/2024

Zakir Ullah
Superintendent Office of the SDO (M) Town-II Peshawar.

.....*Appellant*

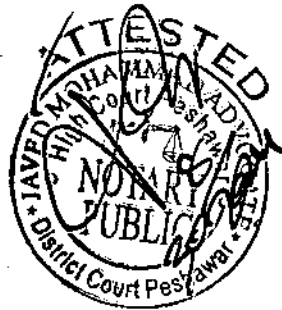
Versus

**Government of Khyber Pakhtunkhwa, through Chief Secretary
Peshawar and 3 others etc.**

.....*Respondents*

AFFIDAVIT

I, **Huma Nisar Superintendent**, SDEO (Female) Town -1 Peshawar at Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Comments** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



A handwritten signature in black ink, appearing to be "Huma Nisar".

DEPONENT

·CNIC No: