


Form- A

FORM OF ORDER SHEET

Court of _____

Case No.:- 1053/2024

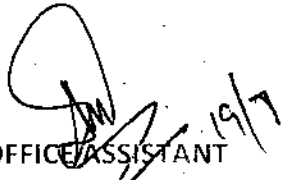
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/07/2024	<p>In compliance with the direction issued by the Honourable Tribunal as per the order sheet dated 24.06.2024 in joint service appeal no. 752/2024, the instant appeal is submitted by the learned counsel in the prescribed format in accordance with the Khyber Pakhtunkhwa Serviced Tribunal Act/Rules 1974. In light of the aforementioned order, the present appeal should also be clubbed with appeal no. 752/2024, which is already fixed for preliminary hearing before the Single Bench at Peshawar on 31.07.2024.</p> <p style="text-align: right;"> REGISTRAR</p>

The appeal of Mr. Saeed Ahmad Khan received today i.e on 15.07.2024 is incomplete on the following score which is returned to the appellant for completion and resubmission within 15 days.

1- Copy of Writ Petition in r/o appellant mentioned in para-6 of the memo of appeal is not attached with the appeal be placed on it.


No. 387 /Inst./2024/KPST,

Dt. 19/7 /2024.


OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

M.Ayub Khan Shinwari Adv.
High Court Peshawar.

Sir,
The appellant filed C.M in w.P No 3474/23 for implementation as Petitioner, which was allowed vide order dated 26-04-24. The said application and order are placed on file. Hence re-submitted for fixation before the Tribunal.


ADVOCATE

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No 653 /2024

Saeed Ahmad Khan Versus Chief Secty, Govt of KP & Others

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Dated: / /2024

Appellant,

Through

Muhammad Ayub Khan Shinwari

LL.B; LL.M

ADVOCATE

Supreme Court of Pakistan

CHAMBER

7-A, Haroon Mansion,

Khyber Bazar, Peshawar

Cell: (Clerk) 03219068514

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IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No 1053 /2024

Saeed Ahmad Khan, Senior Instructor (Retd),
GTVC (B), Haripur

.....Appellant

Versus

1. Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar
2. Secretary, Industries, Commerce and Technical Education Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
3. Chairman, Provincial Selection Board, Govt of Khyber Pakhtunkhwa, Peshawar
4. Secretary, Establishment Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
5. Secretary, Finance Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
6. Managing Director, KP, TEVTA

.....Respondents

**Service Appeal under Section 4 of the Khyber Pakhtunkhwa
Service Tribunal Act, 1974**

Respectfully Sheweth,

Brief but relevant facts of the case are:

1. That the Appellant was initially appointed as Instructors (BPS-14) in the respondent Department. Later on, the Appellant was promoted to the post of Senior Instructor (BPS-17) vide Notification dated 19-02-19. (Copy of Notification is filed herewith and annexed as **Annex-A**)
2. That as per service rules of the respondent department framed vide Notification dated 24-11-2017, the post of Principal/Vice Principal (BPS-18) is to be filled by promotion, on the basis of seniority cum fitness from amongst the Chief Instructors, Training Managers, Vice Principals, Senior Instructors, Trainers and Staff Trainers (BPS-17) having Management training Course of not less than cumulative period of three months and Instructor Training Course of not less than six months from a recognized Institute with five years service as such. (Copy of Service Rules is filed herewith and annexed as **Annex-B**)
3. That in the respondent Department 38 posts of Principals/Vice Principals (BPS-18) are lying vacant. The Appellant is at Serial No 30 of the Final Seniority list of Chief Instructor/Training Manager/Senior Instructor/Trainer/Staff Trainer (BPS-17) circulated vide Notification dated 13-06-2022. The Appellant have served for more than five years as Senior Instructor (BPS-17) in the respondent Department and a part from this the Appellant have completed the requisite courses, thus the Appellant is fit and

eligible to be promoted to the post of Principal/Vice Principal (BPS-18). (Copy of Seniority list and Certificates of requisite Courses are filed herewith & annexed as **Annex-C**)

4. That the Appellant approached the respondents for considering him for promotion to the post of Principal/Vice Principal (BPS-18) by filling applications. (Copy of application is filed herewith and annexed as **Annex-D**)
5. That the aforesaid applications of the Appellant along with his colleagues were sent to the competent authority for placing their cases before the PSB vide letter dated 04-01-2024, *Some of the colleagues have* been promoted to BPS-18, whereas the Appellant has been deprived from promotion. The Appellant has retired from government service vide Notification dated 29-02-2024 on attaining the age of superannuation. (Copy of letter and Notification is filed herewith and annexed as **Annex-E & F**)
6. That the Appellant feeling aggrieved of the inaction of the respondents, filed Writ Petition No 3474, title Muhammad Usman & others Versus Chief Secretary, Govt of KP & others wherein the comments were filed by the respondents and after hearing the Honorable Court was pleased to treat the same as Service Appeal and transmit the same to this Honorable Tribunal vide Judgment dated 30-05-2024. (Copy of Writ Petition, Comments and Judgment is filed herewith and annexed as **Annex-G to I**)

Hence this Service Appeal on the following amongst other grounds:

Grounds:

- a. That the treatment met out to the Appellant is against the law, illegal, unlawful and without lawful authority, thus calling interference of this Honorable Court in its constitutional jurisdiction.
- b. That as per service rules of the respondent department, the Appellant is fit and eligible to be promoted to the post of Principal/Vice Principal (BPS-18).
- c. That before superannuation, the Appellant as per relevant service rules was fit and eligible for promotion, thus was due for his promotion but has been made to suffer merely on account of departmental lapse of not holding PSB meeting before his superannuation. The Appellant has been deprived of his vested right of consideration for promotion due to act of respondents which has caused him permanent loss of pensionary benefits of higher grade despite the fact that the Appellant was pursuing his promotion case diligently and has filed written representation well within time before his superannuation.
- d. That the Appellant is a civil servant and the posts of Principal/Vice Principal (BPS-18) are lying vacant, the Appellant has been denied promotion before superannuation without any fault on his part.

- e. That the treatment met to the Appellant is against the fundamental rights enshrined and protected under the Constitution of Islamic Republic of Pakistan, 1973.
- f. That the treatment met out to the Appellant is against the principles of natural justice and settled principles of administrative law.
- g. That the Appellant crave permission of this Honorable Court to rely on other grounds at the time of arguments and produce any additional document if required in support of his Petition.

It is, therefore, prayed that on acceptance of this service appeal the respondents may kindly be directed to pursue the letter dated 04-01-24 convene the meeting of Provincial Selection Board, prepare the promotion papers of the Appellant and place the same before the next Promotion Selection Board meeting for consideration of the Appellant's proforma promotion to the post of Principal/Vice Principal (BPS-18) with all back benefits.

Grant any additional, further, better and or alternative relief that this Honorable Court may deem fit to grant in the circumstances of this case.

Through

Appellant,

Muhammad Ayub Khan Shinwari
Advocate Supreme Court

Affidavit

I, Saeed Ahmad Khan, Senior Instructor (Retd), GTVC (B), Haripur do hereby solemnly affirm and state on oath that the contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

Deponent

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6	Munir Ali Shah	Senior Instructor (Auto) BPS-17	Senior Instructor (Auto) BPS-17
	Munir Ali Shah	Senior Instructor (Auto) BPS-17	Senior Instructor (Auto) BPS-17
4	Ali Shah	Senior Instructor (Auto) BPS-17	Senior Instructor (Auto) BPS-17
2	Unidentified	Senior Instructor (Auto) BPS-17	Senior Instructor (Auto) BPS-17
1	Ali Shah	Senior Instructor (Auto) BPS-17	Senior Instructor (Auto) BPS-17

3. Upon promotion, the following positions are hereby reserved for the candidates mentioned below:

1. Senior Instructor (Auto) BPS-17 (2) - Munir Ali Shah, Ali Shah

2. Senior Instructor (Auto) BPS-17 (2) - Munir Ali Shah, Ali Shah

The above named positions will be on production for a period of one year from the date of issue of this order.

1	Munir Ali Shah	Senior Instructor (Auto) BPS-17	Senior Instructor (Auto) BPS-17
2	Ali Shah	Senior Instructor (Auto) BPS-17	Senior Instructor (Auto) BPS-17
3	Unidentified	Senior Instructor (Auto) BPS-17	Senior Instructor (Auto) BPS-17
4	Unidentified	Senior Instructor (Auto) BPS-17	Senior Instructor (Auto) BPS-17
5	Unidentified	Senior Instructor (Auto) BPS-17	Senior Instructor (Auto) BPS-17
6	Munir Ali Shah	Senior Instructor (Auto) BPS-17	Senior Instructor (Auto) BPS-17

No. S.O. 1000/2008/2008 On the subject mentioned above.

Annex A/2

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NOTIFICATION

No. SOIII(IND)1-17/2014/DPC. On the recommendations of the Departmental Promotion Committee meeting held on 19.11.2013, the Competent Authority is pleased to promote the following officials of the Directorate of Technical Education, Khyber Pakhtunkhwa Peshawar as noted against their names with immediate effect:-

S. NO	Name of Official	Promoted against the post of
1.	Ali Asghar Shah	Senior Instructor (Pipe Fitter/Plumber) BPS-17
2.	Baitullah Jan	Senior Instructor (D/Ms/Civil) BPS-17
3.	Qayyum Khan	Senior Instructor (Wood work) BPS-17
4.	Akhtar Ali Shah	Senior Instructor (Wood work) BPS-17
5.	Muhammad Irshad	Senior Instructor (Auto) BPS-17
6.	Mumtaz Ali Shah	Senior Instructor (Auto) BPS-17
7.	Naeem Samuel	Senior Instructor (Auto) BPS-17
8.	Muhammad Saeed Ahmad Khan	Senior Instructor (Electrical) BPS-17
9.	Ishtiaq Ahmad	Senior Instructor (Electrical) BPS-17
10.	Bashir Ahmad	Senior Instructor (Electrical) BPS-17
11.	Bakhtiar Ali	Senior Instructor (Electrical) BPS-17

2. The above named promotes will be on probation for a period of one year in terms of section-6 of the Khyber Pakhtunkhwa, Civil Servants Act 1973 read with Rules 15 (1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.

3. Upon Promotion the following postings are hereby ordered with immediate effect.

S. NO	Name of Officer	Posted as
1.	Ali Asghar Shah	Senior Instructor (Plumber) BPS-17 at Govt Technical & Vocational Center (B) Parhina Mansehra against the vacant post.
2.	Baitullah Jan	Senior Instructor (D/Man/Civil) BPS-17 at Govt Technical & Vocational Center (B) Bannu against the vacant post.
3.	Qayyum Khan	Senior Instructor (Wood Work) BPS-17 at Govt Technical & Vocational Center (B) D I Khan against the vacant post.
4.	Akhtar Ali Shah	Senior Instructor (Wood Work) BPS-17 at Govt Technical & Vocational Center (B) Mingora Swat against the vacant post.
5.	Muhammad Irshad	Senior Instructor (Auto) BPS-17 at Govt Technical & Vocational Center (B) Kalabat Haripur against the vacant post.
6.	Mumtaz Ali Shah	Senior Instructor (Auto) BPS-17 at Govt Technical & Vocational Center (B) Ekka Ghund against the vacant post.

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RECORDS SECTION

BY IS (REVEREND) ...
ASSISTANT (GENERAL) ...
DIRECTOR ...
THE DIRECTOR ...
OFFICE ...
THE ...
OFFICE ...

INDUSTRIAL ...
SECURITY ...
DEPARTMENT ...

RECORDS SECTION ...
OFFICE ...
THE ...
OFFICE ...

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S-A

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7.	Muhammad Saeed Ahmad Khan	Chief Instructor (Electrical) BPS-17 at Govt Technical & Vocational Center (B) Kalabat Haripur against the vacant post.
8.	Ishtiaq Ahmad	Senior Instructor (Electrical) BPS-17 at Govt Technical & Vocational Center (B) Matta Swat against the vacant post.
9.	Bashir Ahmad	Senior Instructor (Pipe Fitter/Plumber) BPS-17 at Govt Technical & Vocational Center (B) D.I Khan against the vacant post.
10.	Bakhtiar Ali	Senior Instructor (Electrical) BPS-17 at Govt Technical & Vocational Center (B) Yar Hussain Swabi against the vacant post.

-Sd-

**Secretary to Govt of Khyber Pakhtunkhwa
Industries, Commerce & Technical Education
Department**

Endst: So. SOIII(IND)1-17/2014/DPC Dated Peshawar 19th February 2014

Copy is forwarded to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Director General, Technical Education & Manpower Training Peshawar.
3. The District Accounts Officers, Mansehra, Bannu, D.I Khan, Mingora, Haripur, Dir (Upper), Swat, Swabi and Agency Accounts Officer, Ghallani.
4. The Principals, Govt Technical & Vocational Center (B), Parhina Mansehra, Bannu, D.I Khan, Mingora Swat, Kalabat Haripur, Ekka Ghund, Dir, Matta Swat, Yar Hussain Swabi.
5. All the Officers concerned.
6. Office / File Copy.

**TARIQ ALI KHAN
SECTION OFFICER-III**

ATTESTED

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EXTRAORDINARY
GOVERNMENT



REGISTERED NO. PIII
GAZETTE

Annex B

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KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, FRIDAY, 24TH NOVEMBER, 2017.

Government of Khyber Pakhtunkhwa
Industries, Commerce & Technical Education Department

NOTIFICATION

Dated: 22nd April, 2015.

No. SOIII(IND)4-13/2015/5839-51. — In pursuance of the provision contained in the sub-rule (2) of the rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer Rules, 1989 and supersession of all notifications issued in this behalf, the Industries, Commerce & Technical Education Department, in consultation with Establishment Department and the Finance Department, hereby lays down the method of the recruitment, qualification and other conditions specified in column No.3 to 5 of the Appendix to this notification which shall be applicable to the posts belonging to the Instructional cadre staff of Govt. Advance Technical Training Center, Govt. Technical & Vocational Training Centers and Skill Development Centers (Male & Female) specified in column No.2 of the said Appendix.

Secretary to Govt. of Khyber Pakhtunkhwa,
Industries, Commerce & Technical Education
Department.

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Printed and published by the Manager,
Staty. Prg. Dept., Khyber Pakhtunkhwa, Peshawar.

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Annex B
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APPENDIX

S.No	Nomenclature of the post	Minimum required qualification for initial appointment	Age limit	Method of recruitment
1	2	3	4	5
1.	Principal (BPS-19)	---	---	By promotion, on the basis of seniority cum fitness, from amongst the Principals and Vice Principals (BPS-18) having Management Training Course of not less than cumulative period of three months and Instructor Training Course from a recognized Institute with seven years service as such: Note: Those who attain the age of 58 years shall stand exempted from the mandatory training.
2.	Principal / Vice Principal (BPS-18)	---	---	By promotion, on the basis of seniority cum fitness, from amongst the Chief Instructors, Training Managers, Vice Principals, Senior Instructors, Trainers and Staff Trainers, (BPS-17) having Management Training Course of not less than cumulative period of three months and Instructor Training Course of not less than six months from a recognized Institute with five years service as such:
03	Chief Instructor/ Training Manager/ Vice Principal/ Senior Instructor/ Trainer/Staff Trainer (BPS-17)	i. Diploma of Associate Engineering in the relevant trade from a recognized institute with three years experience in the relevant field; or ii. G-I. Level training course in the relevant trade from a recognized Institute with five years experience in the relevant field.	21-30 years	a). Eighty percent by promotion, on the basis of seniority cum fitness, from amongst the Instructors (BPS-14) having six months Instructor Training Course from a recognized Institute with seven years service as such. Note: Those who attain the age of 58 years shall stand exempted from the mandatory training; and b). Twenty percent by initial recruitment.

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Instructor (BPS-14)

- 21-28 years
- i) Secondary School certificate from a recognized Board with Diploma of Associate Engineering in the relevant trade; technology from a recognized Institute; or
 - ii) Secondary School certificate from a recognized Board with G-I Level Certificate in the relevant trade from a recognized institute; or
 - iii) Secondary School Certificate from a recognized Board with three year apprenticeship Training certificate from registered industrial unit in the relevant trade; or
 - iv) Secondary School Certificate from a recognized board with G-II Level training Course in the relevant trade from a recognized institute having professional experience in the relevant trade

NOTE: G-iii or Trade Proficiency Certificate from a recognized institute having seven years professional or field experience after obtaining Certificate shall be eligible for initial recruitments as instructors (BPS-14) in those trades in which G-II level Training Courses are not available.

a). Ten percent by promotion, on the basis of seniority cum fitness, from amongst the Trade Instructors and Assistant Managers (BPS-11) with seven years service as such, having six months Instructor Training Course from a recognized institute.

Provided that if no suitable person is available for promotion, then by initial recruitment; and

b). Ninety percent by initial recruitment.

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Trade Instructor/ Assistant Manger (BPS-11)	<p>i. Secondary School certificate from a recognized Board with G-I Level course and apprenticeship training course in the relevant trade from a recognized institute; or</p> <p>ii. Secondary School Certificate from a recognized Board with G-II level training course from a recognized institute having three years experience in the relevant trade.</p>	21-28 years.	<p>a). Twenty percent by promotion, on the basis seniority cum fitness, from amongst the jr. Trade Instructors (BPS-10) Draftsman(BPS- with seven years service as such, having months- Instructor Training Course from recognized institute:</p> <p>Provided that if no suitable person is available promotion, then by initial recruitment; and</p> <p>b). Eighty percent by initial recruitment.</p>
Jr. Trade Instructor (BPS-10)	<p>i. G-II level course in the relevant trade from a recognized institute/ Board; or</p> <p>iii. Secondary School Certificate from a recognized Board with G-III Level Training Course from a recognized Institute or Trade Proficiency Certificate with seven years experience.</p>	21-28 years	<p>a). Twenty percent by promotion, on the basis seniority cum fitness, from amongst the Shc Assistants(BPS-06) having Six months Instruct Training Course and Trade Proficiency Certifica from a recognized institute with five year service experience as such; and</p> <p>Provided that if no suitable person is available for promotion then by initial recruitment and</p> <p>b). Eighty percent by initial recruitment.</p>
Draftsman (BPS-10)	<p>ii. G-II level course in the relevant trade from a recognized institute/ Board; or</p> <p>iv. Secondary School Certificate from a recognized Board with G-III Level Training Course or Trade Proficiency Certificate from a recognized Institutewith seven years experience in the relevant Trade.</p>	21-28 years	<p>a). Twenty percent by promotion, on the basis o seniority cum fitness, from amongst the Shop Assistants(BPS-06) having Six months Instructor Training Course and Trade Proficiency Certificate from a recognized institute with five years' service experience as such; and</p> <p>Provided that if no suitable person is available for promotion then by initial recruitment and</p> <p>b). Eighty percent by initial recruitment.</p>

ATTACHED

KHYBER PAKHTUNKHWA GOVT: GAZETTE, EXTRAORDINARY, 24TH NOVEMBER, 2017 684

Shop Assistant (BPS-06)	<ul style="list-style-type: none"> i. Secondary School Certificate from a recognized Board with G-III Level Course from a recognized Institute or ii. Secondary School Certificate from a recognized Board with Trade Proficiency Certificate from a recognized Institute. 	21-28 years	<ul style="list-style-type: none"> a). Twenty percent by promotion, on the basis of seniority cum fitness, from amongst the Attendants Having Secondary School Certificate from a recognized Board with five years' service as such and Trade Proficiency Certificate from a recognized Institute. Provided that if no suitable person is available for promotion then by initial recruitment and b). Eighty percent by initial recruitment.
Shop Attendant (BPS-1)	Secondary School Certificate from a recognized Board	21-28 years	By initial recruitment.

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SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
INDUSTRIES, COMMERCE, & TECHNICAL EDUCATION
DEPARTMENT

ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA
INDUSTRIES, COMMERCE AND TECHNICAL EDUCATION DEPARTMENT

NOTIFICATION

NO. SO-III (IND)4-7/15/SL-17

In pursuance of section 8 of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with rule 17 of Khyber Pakhtunkhwa Civil Servants (appointment, Promotion and Transfer) Rules, 1989, the competent authority has been pleased to order issuance of Final Seniority list of Chief Instructor/Training Manager/Vice Principal/Senior Instructor/Trainer/Staff Trainer (BPS-17) who had not opted to become TEVTA employees on creation of TEVTA is hereby notified /circulated for general information.

FINAL SENIORITY LIST OF CHIEF INSTRUCTOR/TRAINING MANAGER/VICE PRINCIPAL/SENIOR INSTRUCTOR/TRAINER/STAFF TRAINER (BPS-17) IN THE KHYBER PAKHTUNKHWA TECHNICAL EDUCATION AND VOCATIONAL TRAINING AUTHORITY, AS STOOD ON 18-05-2022.

Sr. No	Name of incumbent with academic qualification	Date of birth with domicile	Date of Entry 1 st Entry into Govt. Service	Present Post			Posting at	Remarks.
				Date	BPS	Method of recruitment		
1.	Mr. Zahid Ullah (RAC), i. 18 Months TPC ii. 03 months Management training	02-02-1965 Bannu	06-02-1991	30-04-2008	17	By Up Gradation	GVC(B) Bannu	
2.	Mr. Iqbal Hussain (Carpenter), i. 02 years TPC ii. 06 Months Inst: Trg: Course iii. 03 months Management training	16-03-1964 Peshawar	12-02-1983	30-04-2008	17	Up Gradation	GVC(B) Peshawar	
3.	Mr. Zaffar Akhtar, i. FA ii. G-III (Auto), iii. 06 Months Inst: Trg: Course iv. 03 months Management training	05-06-1967 Mardan	10-08-1984	30-04-2008	17	Up Gradation	GVC(B) Mardan	
4.	Mr. Sahzad Jamil (Plumber), i. 18 Months TPC ii. G-II level Cert: iii. 01 Year Inst: Trg: Course iv. 03 months Management training	12-03-1965 Peshawar	25-08-1984	30-04-2008	17	Up Gradation	GVC(B) Peshawar	ATTESTED

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5.	Mr. Noor Ul Amin (Auto), i. BA ii. DAE (Civil), iii. 06 Months Inst: Trg: Course iv. 03-months Management training	02-12-1964 Mardan	18-04-1987	30-04-2008	17	Up Gradation	GTVC(B) Takht Bhai.	
6.	Mr. Ashfaq Saleem (Auto), i. FA ii. DAE (Auto), iii. 06 Months Inst: Trg: Course iv. 03 months Management training	29-03-1964 Mansehra	28-04-1987	30-04-2008	17	Up Gradation	SDC Balakot	
7.	Mohammad Hasson (Welding), i. MA ii. DAE (Mechanical) iii. 06 Months ITC iv. 01 year Inst: Trg: Course v. 03 months Management training	03-10-1962 Bannu	27-06-1987	30-04-2008	17	Up Gradation	GATC. H/Abad Peshawar	
8.	Mr. Noor Gul (RTV), i. DAE (Electronics) ii. 06 Months Inst: Trg: Course iii. 03 months Management training	15-05-1964 Peshawar	17-02-1991	30-04-2008	17	Up Gradation	GTVC(B) Peshawar	
9.	Mr. Iqbal Khan (Computer), i. Master of Computer Science. ii. 01-year diploma in IT iii. 01 Year TPC in Electronics iv. 06 Months Inst: Trg: Course v. 03 months Management training	07-05-1966 Peshawar	23-01-1992	30-04-2008	17	Up Gradation	GTVC(B) Peshawar	
10.	Mr. Sohail Anjum, (Mechanical) i. A. ii. AE (Mechanical) iii. 3 months Management training	20-11-1967 Peshawar	02-10-1993	13-01-2009	17	Up- gradation	GTVC(B) Peshawar	
11.	Muhammad Fayaz Ali, (D/Mech) i. MA ii. 18 Months TPC.	20-03-1963 Swabi	01-01-1986	01-01-2011	17	By Promotion	GTVC(B) Peshawar	

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	iii. 06 Months Inst: Trg: Course iv. 01 Year Inst: Trg: Course. v. 03 months Management training							
12.	Mr. Nawaz Nathani (RTV). i. BA L.L.B ii. 01 Year TPC iii. 06 Months Inst: Trg: Course i. 03 months Management training	28-10-1964 Peshawar	16-06-1986	26-09-2012	17	Up Gradation	GATK Hayat Abad. Peshawar.	
13.	Mr. Nusrat Shah (Mech). i. 18 Months TPC ii. 06 Months Inst: Trg: Course. iii. 03 months Management training	16-06-1964 Peshawar	02-05-1987	26-09-2012	17	Up Gradation	GTVC(B) Peshawar	
14.	Mr. Sattar Ullah Jan (Electrical). i. G-II Level Cert: i. 18 Months TPC iii. 06 Months Inst: Trg: Course iv. 03 months Management training	15-03-1964 Karak	01-02-1986	14-12-2012	17	By Promotion	GTVC(B) Karak	
15.	Mr. Mashiat Ullah (Electrical) i. M.A ii. 18 Months TPC ii. 06 Months Inst: Trg: Course. iii. 03 months Management training	11-03-1963 D.I.Khan	01-04-1986	14-12-2012	17	By Promotion	GTVC(B) Paharpur D.I.Khan	
16.	Mr. Ihsan Ullah (Mech). i. BA ii. DAE (Mech). iii. TPC D/Man Mechanical iv. 06 Months Inst: Trg: Course v. 01 Year Inst: Trg: Course vi. 03 months Management training	15-10-1963 D.I.Khan	05-07-1986	14-12-2012	17	By Promotion	GTVC(B) D.I.Khan	
17.	Mr. Shoukat Ayaz (Mech). i. DAE (Mech). ii. 01 Year Inst: Trg: Course iii. 03 months Management training	19-03-1963 Mardan	15-04-1987	14-12-2012	17	By Promotion	GPI, Nowshera	
18.	Mr. Sajjad Ahmed (Auto). i. DAE	03-03-1965 Peshawar	06-05-1987	14-12-2012	17	By Promotion	GTVC(B) Peshawar	

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	ii. 06 Months Inst: Trg: Course iii. 03 months Management training							
19.	Mr. Abdul Khaliq (Mech). i. DAE (Mech). ii. 01 Year Inst: Trg: Course iii. 03 months Management training	24-03-1963 Peshawar	10-05-1987	14-12-2012	17	By Promotion	GCT, D.I.Khan	
20.	Mr. Shehzada Khan (Electrical) i. BA ii. DAE (Electrical) iii. 01 Year Inst: Trg: Course	12-04-1964 Hainpur	04-05-1988	14-12-2012	17	By Promotion	GVC(B) Mansehra	
21.	Mr. Shafiq Ullah (Electrical) i. 18 Months TPC ii. 03 months Management training	21-10-1964 Bannu	04-05-1988	14-12-2012	17	By Promotion	GVC(B) Hangu	
22.	Mr. Nafees Ahmad Javed. (RAC) i. MA ii. 18 Months TPC iii. G-III Level Cert: iii. 06 Months Inst: Trg: Course iv. 03 months Management training	05-01-1965 Peshawar	03-09-1991	14-12-2012	17	By Promotion	GVC(B) Peshawar	
23.	Mr. Khalid Mahmood (RTV). i. DAE (Electrical) ii. 06 Months Inst: Trg: Course iii. 03 months Management training	19-03-1966 Mansehra	05-10-1991	14-12-2012	17	By Promotion	GVC(B) Mansehra	
24.	Mr. Ilaf Hussain Shah (RTV). i. DAE in Radio/TV Electronics ii. 06 Months Inst: Trg: Course	15-05-1968 Abbotabad	15-02-1992	14-12-2012	17	By Promotion	GCT(B) Mansehra	
25.	Mr. Tehseen-Ullah (RTV). i. BA ii. DAE Radio/TV iii. 05 Months Advance Trg: from China iv. 06 Months Inst: Trg: Course	02-02-1964 Karak	14-09-1992	14-12-2012	17	By Promotion	GVC(B) Bannu	
26.	Mr. Abdul Rashid. (Welding) i. BA ii. G-III level Cert: iii. 06 Months Tech: Teacher Trg:	13-03-1963 D.I.Khan	04-1987	14-12-2012	17	By Promotion	GVC(B) D.I.Khan	

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28.	Mr. Gayyum Khan, (Wood Work) i. 18 Months TPC ii. 06 Months Inst: Trg: Course	15-01-1963 D.I.Khan	01-08-1984	12-02-2014	17	By Promotion	GTC (E) D.I.Khan
29.	Mr. Naeem Samuel (Auto) i. DAE ii. 06 Months Inst: Training Course	01-10-1963 Peshawar	24-04-1989	19-02-2014	17	By Promotion	GTC (E) Peshawar
29.	Mr. Bail-Ullah Jan (Civil) i. MA, Islamiyat ii. DAE Civil iii. B.Ed iv. 06 Months Inst: Trg: Course	03-11-1964 Lakki Marwal	04-05-1988	19-02-2014	17	By Promotion	GTC (E) Bannu
30.	Mohammad Saeed Ahmad Khan, (Electrical) i. BA ii. 18 Months TPC in Electrical iii. 06 Months Inst: Trg: Course	13-02-1964 Haripur	21-07-1988	19-02-2014	17	By Promotion	GPI, Buner
31.	Mr. Ishliq Ahmed, (Electrical) i. B.Tech (Hons) ii. 06 Months Inst: Trg: Course	02-04-1965 Charsadda	01-09-1988	19-02-2014	17	By Promotion	GPI, Tangi Charsadda
32.	Mr. Bashir Ahmad, (Electrical) i. BA ii. 18 months TPC iii. 01 Year TPC in (Auto) iv. 06 Months Inst: Trg: Course	13-03-1967 Bannu	26-08-1989	19-02-2014	17	By Promotion	GTC (B) Ghazni Khel Lakki Marwal
33.	Mr. Bakhtiar Ali, (Electrical) i. DAE iii. 06 Months Inst: Trg: Course	25-01-1966 Swabi	16-02-1991	19-02-2014	17	By Promotion	GTC (B) Tar Hussain, Swabi
34.	Mr. Ali Asghar Shah, (Plumber) i. G-II Level Cert: ii. G-III Level Cert: iii. 02 years Advance Teacher Training	20-02-1967 Swabi	19-02-1991	19-02-2014	17	By Promotion	GCT, Swabi
35.	Mr. Jamshid Anwar (Wood Work) i. 03 Years TPC ii. 06 Months TPC	13-10-1965 Peshawar	05-02-1986	05-12-2017	17	By Promotion	GTC, Mingora Swat

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36.	Mr. Sher Ali, (Auto) i. FA (ii). 01 Year IPC, iii. 06 Months TPC	09-02-1964 Swat	01-04-1987	05-12-2017	17	By Promotion	GVC (B), Malla	-
37.	Muhammad Usman, (Wood Work) i. FA ii. 02 Years TPC iii. 06 Months ITC iv. Basic Welding.	03-04-1963 Peshawar	06-05-1987	05-12-2017	17	By Promotion	GVC(B) Peshawar	
38.	Muhammad Zeb, (Wood Work) i. 02 Years TPC ii. 06 Months ITC	01-09-1965 Peshawar	23-04-1988	05-12-2017	17	By Promotion	GVC(B) Mardan	
39.	Mr. Ghulam Sattar (Tailoring) i. 06 Months TPC ii. 06 Months Inst: iii. G-II level Cert:	01-08-1966 Peshawar	23-04-1988	05-12-2017	17	By Promotion	GVC(B) Peshawar	
40.	Syed Imam Hussain, (Wood Work) i. 18 Months TPC ii. 02 Years Cert: iii. 06 Months ITC	15-01-1965 Peshawar	25-04-1988	05-12-2017	17	By Promotion	GVC (B) Gulbahar, Peshawar.	
41.	Mr. Muhammad Sammar, (Tailoring) i. 05 Years' Service in tailoring. ii. 06 Months Instructor Trg:	11-04-1965 Mardan	26-04-1988	05-12-2017	17	By Promotion	GVC (B) Mardan	
42.	Mr. Islam ud Din (Wood Work) i. 18 Months TPC ii. 06 Months ITC	17-01-1964 D.I.Khan	30-04-1988	05-12-2017	17	By Promotion	GVC(B) D.I.Khan	
43.	Mr. Abdul Rashid, (Tailoring) i. 18 Months TPC (WLD) ii. 06 Months TPC (Mason) iii. 12 Months TPC (Carpenter) iv. 06 Months Instt: Trg. Course	03-03-1966 D.I.Khan	02-05-1988	05-12-2017	17	By Promotion	GVC (B), Tank	
44.	Mr. Shabir Hussain, (Tailoring) i. 06 Months TPC (Tailoring) ii. G-III level Cert: iii. G-II level Cert: iv. 06 Months ITC	17-02-1965 Peshawar	03-05-1988	05-12-2017	17	By Promotion	GVC(B) Peshawar	ATTESTED
45.	Mr. Ali Muhammad, (Tailoring) i. 18 Months TPC (D/Man Mech) ii. 06 Months Inst: Trg. Course	15-04-1963 D.I.Khan	05-05-1988	05-12-2017	17	By Promotion	GCT, Bannu	
46.	Mr. Ijaz Ahmed, (Electronics)	24-02-1964	12-05-1988	05-12-2017	17	By	GVC (B).	

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	i. 06 Months ITC ii. G-II level Cert: (Wood Work) iii. 18 Months ITC iv. 06 Months ITC	D.I.Khan							
47.	Muhammad Shah (Tailoring) i. Training Certificate ii. 06 Months ITC					Promotion	D.I.Khan		
48.	Mr. Rehmat Karim, (Wood Work) i. DAE ii. 06 Months ITC	13-11-1964 Mardan	07-09-1988	05-12-2012	17	By Promotion	GCT Bajaur		
49.	Mr. Najeeb Ullah Khan, (Auto) i. DAE (Auto) ii. 02 Years TPC iii. G-III level. v. 06 Months ITC	20-10-1966 Chitral	25-06-1988	05-12-2017	17	By Promotion	GTVC(B) Chitral		
50.	Mr. Muhammad Jamil, (Tailoring) i. BA ii. 06 Months TPC. iii. 06 Months Instt; Tra. STI, Pesh.	01-01-1963 Swat	07-11-1988	05-12-2017	17	By Promotion	GTVC(B), Mingora Swat		
51.	Syed Yousaf Ali Shah, (Wood Work) i. DAE ii. 06 Months ITC	14-04-1967 Peshawar	03-05-1988	05-12-2017	17	By Promotion	GPI Sardar Garhi		
52.	Mr. Adeel Azam, (Plumber) i. 18 Months TPC ii. 01 Year ITC Course	07-11-1966 Peshawar	01-02-1992	05-12-2017	17	By Promotion	KP-TEVTA. - Head Office		
53.	Mr. Jehan Zeb Khan, i. DAE (Mech) ii. 1 Year ITC Course.	07-07-1968 Peshawar	16-04-1987	05-12-2017	17	By Promotion	GTVC(B) - Peshawar		
54.	Mr. Shujat Ali, (Mech) i. BSC ii. DAE iii. 06 Months ITC	07-06-1966 Peshawar	01-08-1988	05-12-2017	17	By Promotion	GTVC (B) Peshawar.		
55.	Mr. Ajmal Khan, i. B.A ii. DAE (Mech) iii. 06 Months ITC Course	10-03-1966 D.I.Khan	05-09-1989	05-12-2017	17	By Promotion	GCT, D.I.Khan		
56.	Mr. Saleem Ahmad, (D.Man Civil) i. B.A ii. DAE (Civil)	17-09-1964 Bannu.	13-09-1989	05-12-2017	17	By Promotion	GTVC(B) Peshawar		
		01-04-1964 D.I.Khan	25-09-1989	05-12-2017	17	By Promotion	GPI, Haripur		

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57.	iii. 06 Months ITC Course Mr. Rahim Ur Rehman, (Mech) i. MA ii. DAE (Mech) iii. 01 Year ITC Cour.	01-01-1965 Swat	16-09-1990	05-12-2017	17	By Promotion	GTVC (B), Mingora Swat
58.	Mr. Murid Hussain, i. DAE in (Mechanical)	07-01-1965 D.I.Khan	06-02-1991	05-12-2017	17	By Promotion	GTVC (B), Paharpur DIK
59.	Mr. Shafiqat Ullah, (Electrical) i. 03 Years DAE ii. 06 Months ITC.	09-05-1967 Bannu	01-07-1991	05-12-2017	17	By Promotion	GTVC (B) Peshawar
60.	Muhammad Jamil, (Electrical) i. 18 Months TPC ii. 06 Months ITC. iii. G-II TPC	10-05-1969 Haripur	14-05-1992	05-12-2017	17	By Promotion	GTVC (B) Paharpur D.I.Khan
61.	Mr. Fazal Rehman, i. DAE (D/M Civil) ii. 06 Months ITC	09-03-1963 D.I.Khan	15-06-1992	05-12-2017	17	By Promotion	GTVC (B) Paharpur D.I.Khan
62.	Mr. Asif Daud, i. DAE (Mech) ii. MA iii. 06 Months ITC Course	05-05-1966 Peshawar	01-07-1992	05-12-2017	17	By Promotion	GTVC (B) Peshawar
63.	Mr. Sher Ali Baz Khan, (Plumber) i. MA ii. G-II Level Cert iii. G-III Level Cert. iv. 01 Year ITC	20-01-1964 Bannu	17-08-1992	05-12-2017	17	By Promotion	GCT, Bannu
64.	Mohammad Ayaz Khan, i. BA ii. 03 Years DAE (Electrical) iii. 06 Months ITC	01-07-1967 Peshawar	30-08-1992	05-12-2017	17	By Promotion	GTVC (B) Peshawar
65.	Mr. Hayat Khan, (D/M Civil) i. B.A (ii). DAE (D/M Civil) iii. 06 Months ITC	10-11-1966 Lakki Marwat	14-10-1992	05-12-2017	17	By Promotion	GTVC (B) D.I.Khan
66.	Mr. Qamar Ali, (Auto) i. DAE ii. 06 Months ITC	19-01-1964 Swabi	01-11-1992	05-12-2017	17	By Promotion	GTVC (B) Peshawar

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67.	Mr. Dil Jan Khan, i. DAE (Mech) ii. 06 Months ITC	05-12-1969 Lakki Marwat	29-12-1992	05-12-2017	17	By Promotion	GCT, D.I. Khan
68.	Mr. Zafar Iqbal, (Wood Work) i. F.A (ii). 02 Years TPC iii. 06 Months ITC	01-12-1967 Peshawar	20-02-1993	05-12-2017	17	By Promotion	GTVC (B) Peshawar
69.	Mr. Shoukat Ali, (RAC) i. G-II Level TPC ii. 5 Months AT in PR iii. 06 Months ITC	08-12-1962 Bannu	02-09-1993	05-12-2017	17	By Promotion	GCT, Bannu.
70.	Mr. Hamayun Khan, (Mechanical) i. B.A ii. DAE. iii. 06 Months ITC, Cert	16-02-1971 Khyber Agency	29-05-1997	05-12-2017	17	By Promotion	GTVC(B) Peshawar.
71.	Mr. Asghar Khan, (RAC) i. B. Sc ii. G-II Level TPC RAC iii. 06 Months ITC	18-02-1968 Kohat	17-04-1995	05-04-2018	17	By Promotion	GCT, Kohat
72.	Mr. Amjad Waheed Khan, i. BA/DAE (Mechanical) iii. 06 Months Course: AITC iv. 06 Months ITC	03-09-1971 D.I. Khan	24-06-1997	05-04-2018	17	By Promotion	GCT, D.I. Khan
73.	Mohammad Nawab, DAE Electrical	16-03-1966 Swabi	01-06-1999	25-10-2018	17	By Promotion	GCT Swabi
74.	MR. Gul Razim Khan, i. Matric (ii). G-II RAC iii. 06 Months ITC, from NTB, Islamabad.	08-08-1971 Bannu	06-06-2002	25-10-2018	17	By Promotion	GTVC(B) Bannu
75.	Mr. Laiq Muhammad. (Wood Work) i. Matric. (ii). 02 years TPC iii. 06 Months ITC	11-12-1965 DIR	12-04-1987	28-10-2019	17	By Promotion	GTI, Ekka Ghund.
76.	Syed Kiramat Ali Shah. i. DAE (AUTO MECHANIC) ii. 01-year G-III iii. 06 Months ITC	10-05-1975 Abbotabad	18-03-1999	28-10-2019	17	By Promotion	GTVC(B) Peshawar

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77.	Mr. Razim Ullah. i. FA/02-year Certificate (Electrical) ii. 06 Months ITC	19-01-1965 Nowshera.	18-12-1985	28-10-2019	17	By Promotion	GPI, Nowshera
78.	Mr. Saqib Shah. i. 02-year Certificate (Electrical) ii. 06 Months ITC	06-01-1964 Peshawar	19-03-1986	28-10-2019	17	By Promotion	GIVC(B), Peshawar
79.	Mr. Sraaj Ul Islam (RAc) i. DAE ii. 06 Months ITC	10-01-1970 Mardan	14-05-1966	28-10-2019	17	By Promotion	GATC, Hayatabad, Peshawar.
80.	Mr. Rana Ajmal Khan (Tailoring) i. Matric ii. 06 Months ITC	01-04-1978 D.I. Khan	25-04-2006	28-10-2019	17	By Promotion	GIVC(B), D.I. Khan
81.	Mr. Sher Aslam i. 02 year Certificate (Electrical) ii. 06 Months ITC	01-01-1963 Haripur	30-08-1993	28-10-2019	17	By Promotion	GIVC (B) KTS, Haripur.
82.	Mr. Siraj Ahmad i. DAE (Mechanical) ii. 06 Months ITC	01-01-1970 Abbottabad	05-05-2006	28-10-2019	17	By Promotion	GIVC (B) KTS, Haripur.
83.	Syed Yawar Ali Shah i. DAE (Auto Mechanic) ii. 06 Months	01-04-1980 Charsadda	13-05-2006	28-10-2019	17	By Promotion	GPI, Ekka Ghund.

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NO. SO-III (IND)4-7/17/SL/ /545-47

Copy is forwarded to:-

1. The Managing Director KP-TEVTA.
2. The Principal GCT's/GPI's & GTI's.

CHIEF SECRETARY
KHYBER PAKHTUNKHWA

Dated 13-06-2022.

(Signature)

Section Officer-III

Industries, Commerce & Technical Education Department

ATTESTED

GOVERNMENT OF N.W.F.P.

DIRECTORATE OF MANPOWER & TRAINING
STAFF TRAINING INSTITUTE

Sr. No. 0000065



Reg. No. STI/30-27

Certificate

This is to certify that

Mr. SAHEEL AHMED No. Mr. MOHAMED YOUSUF KHAN
of ELECTRICIAN trade has successfully completed the 24 months

Instructor Training Course

held at Staff Training Institute, Peshawar

His average performance during the training period and in the final test
conducted in AUGUST 1939 is as under:

1 Teaching Technology	70 %
5 Workshop Practice	88 %
1 Trade Theory	69 %

Issued on the 7th day of June 1939

Joint Director
Staff Training Institute
16/A Industrial Estate
Jamrud Road Peshawar

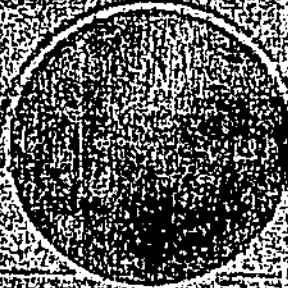


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Director
Manpower & Training
N.W.F.P.

ATTESTED

Dr. Harat Hussain
Principal
GITC Hayatabad



Ministry of Education, Government of Punjab
Peshawar

Government College Hayatabad Peshawar

From 30/06/2021 to 30/06/2021

03-MONTHS MANDATORY MANAGEMENT TRAINING

Successful completion of the training program

MUHAMMAD YOUNIS KHAN

S/O

MR. SAED AHMAD KHAN

awarded to

CERTIFICATE OF TRAINING



GOVERNMENT TECHNICAL TEACHERS TRAINING COLLEGE
HAYATABAD PESHAWAR



To:

THE HONORABLE CHIEF SECRETARY

KHYBER PAKHTUNKHWA

PESHAWAR



Handwritten notes: "A. Khan" and "23" with a checkmark.

THROUGH PROPER CHANNEL

SUBJECT: REQUEST FOR PROMOTION FROM THE POST OF SENIOR (BPS-17) TO THE POST OF PRINCIPAL/VICE-PRINCIPAL BPS-18

Respected Sir,

With due respect it is stated that presently I am working as Incharge Principal (BPS-17) at Govt. Technical & Vocational Centre Boys, Khalabat Township, Haripur w.e.f 01-04-2023. For your kind information, the 28 posts of Principal/Vice-Principal BPS-18 are lying vacant and my seniority position is at No. 15 in the seniority list of BPS-17.

Furthermore, my Date of Birth is 15-02-1964 and I will attain the age of superannuation on 12-02-2024. I assure you sir, that I already fulfilled the required criteria for promotion.

Moreover, as Provincial Selection Board (PSB) meeting held in the near past, therefore it is clear that next meeting of PSB is impossible in this short time.

It is therefore requested that my case for promotion may very kindly approved through circulation to reach the justice to its ends.

Thanks with Best Regards,

Dated: 27-11-2023

Handwritten signature of Saqib Ahmed Khan.

SAQIB AHMED KHAN

Senior Instructor BPS-17 (Incharge Principal)

Govt. Technical & Vocational Centre Boys KTS

Haripur

Copy in advance is forwarded to the Honorable Chief Secretary, Khyber Pakhtunkhwa with the request that my original application will be routed through proper channel.

Handwritten initials "S/A".

Handwritten signature of Saqib Ahmed Khan.

SAQIB AHMED KHAN

Senior Instructor BPS-17 (Incharge Principal)

Govt. Technical & Vocational Centre Boys KTS

Haripur

ATTESTED stamp with a signature over it.

Handwritten signature and "ATTESTED" stamp at the bottom of the page.

To

The Hon'ble Chief Secretary,
Khyber Pakhtunkhwa,
Peshawar.

Through: PROPER CHANNEL

Subject:- REQUEST FOR PROMOTION FROM THE POST OF SENIOR (BPS-17) TO THE POST OF PRINCIPAL/VICE PRINCIPAL BPS-18.

Respected Sir,

With due respect it is stated that presently I am working as Incharge Principal (BPS-17) at Govt. Technical & Vocational Centre Boys Khalabat Township, Haripur w.e.f. 01/04/2023. For your kind information, the 28 posts of Principal/Vice-Principal BPS-18 are lying vacant any my seniority position is at No. 15 in the seniority list of BPS-17.

Furthermore, my Date of Birth is 13/02/1964 and I will attain the age of superannuation on 12/02/2024. I assure you sir that I already fulfilled the required criteria for promotion.

Moreover, as Provincial Selection Board (PSB) meeting held in the near past, therefore, it is clear that next meeting of PSB is impossible in this short time.

It is therefore requested that my case for promotion may very kindly approved through circulation to reach the justice to its ends.

Thanks with Best Regards,

Dated:-27/11/2023

-sd-

SAEED AHMAD KHAN
Senior Instructor BPS-17 (Incharge Principal)
Government Technical & Vocational Centre Boys KTS
Haripur

Copy in advance is forwarded to the Hon'ble Chief Secretary Khyber Pakhtunkhwa with the request that my original application will be routed through proper channel.

-sd-

SAEED AHMAD KHAN
Senior Instructor BPS-17 (Incharge Principal)
Government Technical & Vocational Centre Boys KTS
Haripur

*Attended
✓
Aeer*



GOVERNMENT OF KHYBER PAKHTUNKHWA
INDUSTRIES, COMMERCE & TECHNICAL
EDUCATION DEPARTMENT

No. SOTE(IND)/PSB/2023/Vol-I/211-13
Dated Peshawar the 04th January, 2024

To,

The Secretary to Govt. of Khyber Pakhtunkhwa,
Establishment Department

Subject: - REQUEST FOR PROMOTION FROM THE POST OF SENIOR INSTRUCTORS BPS-17 TO THE POST OF PRINCIPAL / VICE PRINCIPAL BPS-18 (BY CIRCULATION)

Dear Sir,

I am directed to refer to the subject noted above and to forward herewith seven (07) sets of Working Paper along-with its relevant documents in favour of following Senior Instructors BPS-17 in KP-TEVTA, who fulfills all component / formalities for promotion and are eligible in all respect, for placing before the Provincial Selection Board for consideration.

S. No	Seniority No	Name of the Officer	Station	Date of retirement at superannuation
1	26	Islam-ud-Din	GCT (B) D.I.Khan	16.01.2024
2	12	Tehseen Ullah	GTVC (B), Bannu	01.02.2024
3	21	Sher Ali	GTVC (B) Mata, Swat	08.02.2024
4	15	Muhammad Saeed Ahmad Khan	GTVC (B) Khalabat, Haripur	12.02.2024
5	29	Ijaz Ahmad	GTVC (B) D.I.Khan	23.02.2024
6	04	Sattar Ullah Jan	GTVC (W), Karak	14.03.2024

It is therefore, requested to kindly consider the promotion (through circulation), as the said officers are at the verge of retirement, please.

Encl: As Above:

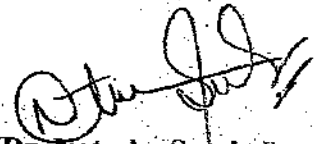

(Dr. Natasha Sumbal)
SECTION OFFICER (TE)

Endstt: No. & Date even.

Copy of the above is forwarded for information to the: -

1. Managing Director KP-TEVTA, with reference to letter No. TEVTA/PER:/140024 dated 29.12.2024
2. PS to Secretary IC&TE Department

ATTESTED


(Dr. Natasha Sumbal)
SECTION OFFICER (TE)

F
Annex 25
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GOVERNMENT OF KHYBER PAKHTUNKHWA
INDUSTRIES, COMMERCE & TECHNICAL,
EDUCATION DEPARTMENT

NOTIFICATION

No. SOTE(IND)/Retirement/2024/Vol-I/ 2647 In terms of provision of Rule-20 of the Khyber Pakhtunkhwa Civil Servants Revised Leave Rules-1981 and instructions issued thereunder from time to time, sanction is hereby accorded to the encashment of leave in lieu of L.P.R equal to 365 days in favour of Mr. Saeed Ahmad Khan, Senior Instructor BPS-17 Government Technical & Vocational Centre (B) KTS, Haripur.

2. In terms of section-13 of the Khyber Pakhtunkhwa Civil Servant Act 1973, the officer will retire from government service on attaining the age of superannuation with effect from 12.02.2024 (A.N). The date of birth of the officer is 13.02.1964.

Secretary to Govt. of Khyber Pakhtunkhwa,
Industries, Commerce & Technical
Education Department

Endst: No. SOTE(IND)/Retirement/2024/Vol-I/ Dated Pesh, the 29th February, 2024

Copy is forwarded to the:-

1. Managing Director, KP-TEVTA
2. District Accounts Officer, Haripur
3. Principal, Government Technical & Vocational Centre (B) KTS, Haripur
4. Officer concerned

(Dr. Natasha Sumbal)
SECTION OFFICER (TE)

ATTESTED

Rizayat

IN THE PESHAWAR HIGH COURT, PESHAWAR

Writ Petition No 3474/P 12023



Court
Order
dt 26/4/24

1. Muhammad Usman, Senior Instructor (Retd), GTVC (B) Gulbahar, Peshawar
 2. Abdur Rasheed Khan, Senior Instructor (Retd), GTVC (B), D.I Khan
 3. ~~Ali Akbar Khan, Ex-Senior Instructor, GTVC (B), Mulla, Swat~~
 4. ~~Saeed Ahmad Khan, Ex-Senior Instructor, GTVC (B), Haripur~~ Petitioners
 5. ~~Tahseenullah, Ex-Senior Instructor, GTVC (B), Swat~~
 6. ~~Nojebullah Khan, Ex-Senior Instructor, GTVC (B), Mingora Swat~~
- versus
1. Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar
 2. Secretary, Industries, Commerce and Technical Education Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
 3. Chairman, Provincial Selection Board, Govt of Khyber Pakhtunkhwa, Peshawar
 4. Secretary, Establishment Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
 5. Secretary, Finance Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
 6. Managing Director, KP, TEVTA Respondents

Writ Petition under Article 199 of The Constitution of Islamic Republic of Pakistan, 1973

Respectfully Sheweth,

The Petitioners humbly craves permission to plead for solace of their grievance while invoking the constitutional jurisdiction of this Honorable Court as under:

Brief but relevant facts warranting this Writ Petition

1. That the Petitioners were initially appointed as Instructors (BPS-14) in the respondent Department. Later on, the Petitioners were promoted to the post of Senior Instructor (BPS-17) vide Notification dated 05-12-2017. (Copy of Notification is filed herewith and annexed as **Annex-A**)
2. That as per service rules of the respondent department framed vide Notification dated 24-11-2017, the post of Principal/Vice Principal (BPS-18) is to be filled by promotion, on the basis of seniority cum fitness from amongst the Chief Instructors, Training Managers, Vice Principals, Senior Instructors, Trainers and Staff Trainers (BPS-17) having Management training Course of not less than cumulative period of three months and Instructor Training Course of not less than six months from a recognized Institute with five years service as such. (Copy of Service Rules is filed herewith and annexed as **Annex-B**)
3. That in the respondent Department 38 posts of Principals/Vice Principals (BPS-18) are lying vacant. The Petitioner No 1 is at Serial No 37 and Petitioner No 2 is at Serial No 26 of the Final Seniority list of Chief

FILED
12 AUG 2023

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Instructor/Training Manager/Senior Instructor/Trainer/Staff Trainer (BPS-17) circulated vide Notification dated 13-06-2022. The Petitioners have served for more than five years as Senior Instructors (BPS-17) in the respondent Department and a part from this the Petitioners have completed the requisite courses, thus the Petitioners are fit and eligible to be promoted to the post of Principal/Vice Principal (BPS-18). (Copy of Seniority list and Certificates of requisite Courses are filed herewith & annexed as Annex-C)

- 4. That the Petitioners approached the respondents for considering them for promotion to the post of Principal/Vice Principal (BPS-18) by filling applications. (Copy of application is filed herewith and annexed as Annex-D)
- 5. That the aforesaid applications of the Petitioners along with one Mr Muhammad Hassan, Senior Instructor were sent to the competent authority for placing their cases before the PSB vide letter dated 10-02-2023. The said Mr Muhammad Hassan, Senior Instructor has been promoted to BPS-18 which is evident from the Notification dated 17th November, 2022, whereas the Petitioners have been deprived from promotion. The Petitioner No 1 has retired from government service vide Notification dated 13-02-2023 and Petitioner No 2 has retired from government service on attaining the age of superannuation on 12-03-2023. (Copies of letter and Notifications are filed herewith and annexed as Annex-E & F)

Thus, the Petitioners feeling aggrieved of the inaction of the respondents, having no other adequate, alternate and efficacious remedy are constrained to approach this Honorable Court in its constitutional jurisdiction on the following amongst other grounds:

Grounds:

- a. That the treatment met out to the Petitioners is against the law, illegal, unlawful and without lawful authority, thus calling interference of this Honorable Court in its constitutional jurisdiction.
- b. That as per service rules of the respondent department, the Petitioners are fit and eligible to be promoted to the post of Principal/Vice Principal (BPS-18).
- c. That before superannuation, the Petitioners as per relevant service rules were fit and eligible for promotion, thus were due for their promotion but have been made to suffer merely on account of departmental lapse of not holding PSB meeting before their superannuation. The Petitioners have been deprived of their vested right of consideration for promotion due to act of respondents which has caused them permanent loss of pensionary benefits of higher grade despite the fact that the Petitioners were pursuing their promotion cases diligently and have filed written representation well within time before their superannuation.

ATTESTED


ATTESTED
EXAMINER
Constitutional Bench Court

B

- d. That the Petitioners are a civil servants and the posts of Principal/Vice Principal (BPS-18) are lying vacant, the Petitioners have been denied promotion before superannuation without any fault on their part.
- e. That the treatment met to the Petitioners is against the fundamental rights enshrined and protected under the Constitution of Islamic Republic of Pakistan, 1973.
- f. That the treatment met out to the Petitioners is against the principles of natural justice and settled principles of administrative law.
- g. That the Petitioners crave permission of this Honorable Court to rely on other grounds at the time of arguments and produce any additional document if required in support of his Petition.


It is, therefore, prayed that on acceptance of this Writ Petition an appropriate Writ may kindly be issued to the effect to direct the respondents to convene the meeting of Provincial Selection Board, prepare the promotion papers of the Petitioners and place the same before the next Promotion Selection Board meeting for consideration of the Petitioner's proforma promotion to the posts of Principal/Vice Principal (BPS-18) with all back benefits.

Grant any additional, further, better and or alternative relief that this Honorable Court may deem fit to grant in the circumstances of this case.

Through Petitioners,

Muhammad Ayub Khan Shinwari
 Advocate Supreme Court

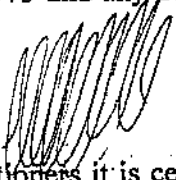
Interim Relief:

In view of all the ingredients requisite for interim relief, it is prayed that the respondents be restrained from taking any adverse action against the Petitioner till the final disposal of the Writ Petition.

 Advocate


List of Books:

Constitution of Islamic Republic of Pakistan, 1973 and any other law book as per need.

 Advocate

Certificate:

As per information furnished to me by my Petitioners it is certified that no such like petition on the subject matter has earlier been filed by the Petitioners before this court or any other court.

 Advocate

ATTESTED

ATTESTED
 EXAMINER


Annex H 29

IN THE PESHAWAR HIGH COURT, PESHAWAR

WRIT PETITION NO. 3474-P/2023

Muhammad Usman, Senior Instructor(Retd), GTVC (B) Gulbahar, Peshawar

Abdur Rasheed Khan, Senior instructor (Retd), GTVC (B), D.I Khan

..... Petitioners

Versus

1. Chief Secretary, Government of Khyber Pakhtunkhwa Peshawar
2. Secretary, Industries, Commerce and Technical Education Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
3. Chairman, Provincial Selection Board, Govt of Khyber Pakhtunkhwa, Peshawar
4. Secretary, Establishment Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
5. Secretary, Finance Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
6. Managing Director, KP- TEVTA

..... Respondents.

INDEX

S.No	Description of documents	Annex	Page No
1.	Para wise Comments	--	1-2
2.	Affidavit	--	3

ATTESTED

IN THE PESHAWAR HIGH COURT, PESHAWAR

WRIT PETITION NO. 3474-P/2023

Muhammad Usman, Senior Instructor(Retd), GTVC (B) Gulbahar, Peshawar

Abdur Rasheed Khan, Senior Instructor (Retd), GTVC (B), D.I Khan

..... Petitioners

Versus

- 1. Chief Secretary, Government of Khyber Pakhtunkhwa Peshawar
- 2. Secretary, Industries, Commerce and Technical Education Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
- 3. Chairman, Provincial Selection Board, Govt of Khyber Pakhtunkhwa, Peshawar
- 4. Secretary, Establishment Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
- 5. Secretary, Finance Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
- 6. Managing Director, KP- TEVTA

..... Respondents.

PRELIMINARY OBJECTIONS:

- I. The Writ Petition has for its subject matter, terms and condition of service of a civil servant, which cannot be adjudicated under 212 of the constitution.
- II. That this honorable court has no jurisdiction to entertain the instant petition.
- III. That the writ petition is time barred.
- IV. That the petitioners have no cause of action.
- V. That the petitioners have got no locus standi.
- VI. That the petition is incompetent in its present form for mis joinder and non-joinder of the necessary parties.
- VII. That the petitioners have not come to this honorable court with clean hands.
- VIII. That the petitioners are legally estopped by their own conduct to file the present petition.
- IX. That the petition is not maintainable.

Respectfully Sheweth:

- 1- Pertains to records.
- 2- Pertains to records.
- 3- Misconceived as laid. This honorable court cannot delve in to the matter of promotion, which are exclusively terms and condition of service.
- 4- Pertains to records.
- 5- It is incorrect as laid. It is quite apparent from the face of the record that the petitioners seeks enforcement of his terms and conditions of service through writ jurisdiction, the same are not allowed in light of specific bar of Article 212 of constitution. It is also mentioned that the promotion cases of the retired employees do not fall within the ambit of Provincial Promotion Policy 2009 of the Government. Hence their cases could not be placed before the PSB forum.

Grounds:

- a- It is incorrect. The cases of the petitioner have been dealt in accordance with Provincial Promotion Policy 2009 of the Government. Again reiterated that terms and conditions cannot be enforced /invoked through writ jurisdiction due to express bar of Article 212.
- b- It is incorrect in view of aforementioned comprehensive reply.

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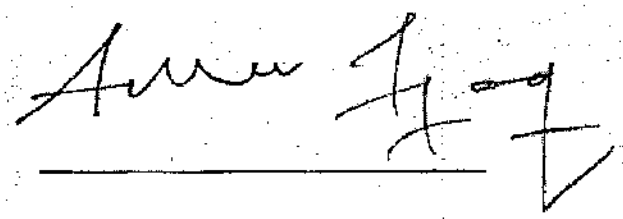
- c- It is incorrect. The promotion cases of the petitioners were in processed with in accordance with laid down procedure.
- d- It is incorrect in view of aforementioned comprehensive reply.
- e- It is incorrect in view of aforementioned comprehensive reply.
- f- It is incorrect in view of aforementioned comprehensive reply.
- g- That the respondent seek permission of the honorable court to rely on other defense ground at time of arguments and produce any additional document if required in support of their defense.

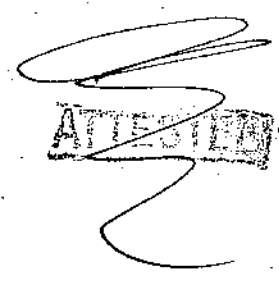
In view of the above, it is evident that the instant petition has no force of law and facts. It is, therefore, requested that the instant petition may be dismissed.

**Secretary to Govt: of Khyber Pakhtunkhwa,
Industries, Commerce and Technical Education
Department.**
Respondent No.2

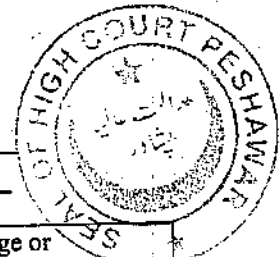


**Managing Director,
Khyber Pakhtunkhwa Technical Education
& Vocational Training Authority**
Respondent No.6





PESHAWAR HIGH COURT, PESHAWAR
FORM "A"
FORM OF ORDER SHEET.



Court of _____
Case No _____

Serial No of order or proceeding	Date of Order or Proceeding	Order or other proceedings with Signature of judge or Magistrate and that of parties or counsel where necessary
1	2	3
	30.05.2024	<p><u>W.P No. 3474-P/2023 with IR</u></p> <p><u>Present:-</u> Mr. Muhammad Ayub Khan Shinwari, advocate for the petitioners.</p> <p>Mr. Ali Gohar Durrani, advocate for the respondents.</p> <p>*****</p> <p><u>IJAZ ANWAR.J.</u> At the very outset, counsel for respondents objected to the maintainability of instant writ petition in view of the bar contained in Article 212 of the Constitution of Islamic Republic of Pakistan, 1973. When confronted, counsel for petitioners stated that the instant writ petition be treated as Departmental appeal and send to the Service Tribunal for decision.</p> <p>2. In terms of Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, this Court can only entertain a writ petition where there is no other adequate remedy available while in the instant matter, there is an alternate and efficacious remedy of filing appeal is available to the petitioners. As such, we instead of dismissing this</p>

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EXAMINE
Peshawar High Court

petition, treat it as a service appeal and transmit it to the Khyber Pakhtunkhwa Service Tribunal, (KPST) for its decision strictly in accordance with law. Office shall retain copy of the memo of this petition and transmit the original writ petition alongwith its annexures to the KPST, Peshawar. Separate copies of the petition be provided to the petitioners in terms of Khyber Pakhtunkhwa Service Tribunal Rules, 1974 to be presented as appeals before the Tribunal. Petitioners shall appear before the Tribunal on 24.6.2024.

[Signature]
 Senior
 Puisne Judge

[Signature]
 Judge

Announced.
 Dated. 30.5.2024.

49397
 Date of Presentation of Application 20-06-2024
 No of Pages 6
 Copying fee 24/-
 Total 20-06-2024
 Date of Preparation 20-06-2024
 Name of Applicant Rizayat

CERTIFIED TO BE TRUE COPY
 EXAMINER
 Peshawar High Court, Peshawar
 Authorized Under Article 8, 7 of
 the Qanun-e-Shahadaat Act 1984
 20 JUN 2024

[Signature]

①

IN THE PESHAWAR HIGH COURT, PESHAWAR

C.M No _____/2024

in

Writ Petition No _____/2023

Muhammad Usman & another Versus Chief Secty, Govt of KP & Others

Application for impleadment as Petitioners in the title Writ Petition of applicants i.e.,

- (1) Sher Ali Khan, Ex-Senior Instructor, GTVC(B), Matta, Swat
- (2) Saeed Ahmad Khan, Ex-Senior Instructor, GTVC(B), Haripur
- (3) Tahseenullah, Ex-Senior Instructor, GTVC(B), Bannu

Respectfully Sheweth,

The applicant submits as follows:

1. That the title Writ Petition is pending adjudication before this Honorable Court wherein no date of hearing is fixed yet.
2. That the applicants are similarly placed employees like the Petitioners in the title Writ Petition, details are given in next para's, thus seeking impleadment as Petitioners in the title Writ Petition.
3. That the applicants were initially appointed as Instructors (BPS-14) in the respondent Department. Later on, the applicant No 1 was promoted to the post of Senior Instructor (BPS-17) vide Notification dated 05-12-17, Applicant No 2 vide Notification dated 19-12-14 and Applicant No 3 vide Notification dated 14-12-12. (Copies of Notifications are filed herewith and annexed as Annex-A/1 to A/3)
6. That in the respondent Department 38 posts of Principals/Vice Principals (BPS-18) are lying vacant. The applicant No 1 is at Serial No 36, applicant No 2 is at Serial No 30 and applicant No 3 is at Serial No 25 of the Final Seniority list of Chief Instructor/Training Manager/Senior Instructor/Trainer/Staff Trainer (BPS-17) circulated vide Notification dated 13-06-2022. The applicants have served for more than five years as Senior Instructors (BPS-17) in the respondent Department and a part from this the Petitioners have completed the requisite courses, thus the applicants are fit

PESHAWAR HIGH COURT

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and eligible to be promoted to the post of Principal/Vice Principal (BPS-18).
(Copy of Seniority list is at Annex-C of the Writ Petition)

7. That the applicants approached the respondents for considering them for promotion to the post of Principal/Vice Principal (BPS-18) by filling applications. (Copy of application is filed herewith and annexed as Annex-C)
4. That the aforesaid applications of the applicants were sent to the competent authority for placing their cases before the PSB vide letter dated 04-01-24 which bore no fruit, meanwhile the applicants have retired from government service on attaining the age of superannuation. It is pertinent to mention here that a similarly placed colleague of the applicants i.e., Mr Ihsanullah Senior Instructor (BPS-17) has been promoted to BPS-18 on notional basis vide Notification dated 08-11-23, (Copy of letter and Notification is filed herewith and annexed as Annex-D & E)

It is, therefore, prayed that the applicants may kindly be arrayed as Petitioners in the title Writ Petition and may kindly be granted the same relief as has been prayed for in the title Writ Petition.

Through

Applicants,

Muhammad Ayub Khan Shinwari
Advocate Supreme Court



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EXAMINER
Public Information Commission

PESHAWAR HIGH COURT, PESHAWAR

Form "A"

FORM OF ORDER SHEET



Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or that of parties or counsel where necessary
26.04.2024	<p>W.P 3474/2023</p> <p>Present: Mr. Muhammad Ayub Khan Shinwari, Advocate, for the petitioners.</p> <p>*****</p> <p>CM 570-P/2024</p> <p>SHAKEEL AHMAD, J.- Through this application, applicants namely (i) Sher Ali Khan, Ex-Senior Instructor, GTVC(B), Matta, Swat (ii) Saeed Ahmad Khan, Ex-Senior Instructor, GTVC(B), Haripur (iii) Tahseenullah, Ex-Senior Instructor, GTVC(B), Bannu, seek their impleadment as petitioners in the memo of main writ petition being necessary parties.</p> <p>2. The grounds, urged in the application, seem to be genuine, therefore, this application is allowed and the above-mentioned applicants are impleaded as petitioners with direction to office to add them in the memo of main writ petition and also in the relevant register with red ink.</p> <p>CM 791-P/2024</p> <p>SHAKEEL AHMAD, J.- By filing the instant application, the applicant, namely, Najeeb Ullah Khan, Ex-Senior Instructor, GTVC(B), Mingora, Swat, seek his impleadment as petitioner in the memo of main writ petition being necessary party.</p> <p>2. The grounds, urged in the application, seem to be genuine, therefore, this application is allowed and the above-mentioned applicant is impleaded as petitioner with direction to office to add him in the memo of main writ petition and also in the relevant register with red ink.</p> <p>3. Besides, the main case is adjourned to a short date in office.</p> <p style="text-align: right;"> JUDGE</p> <p style="text-align: right;"> JUDGE</p>

(Shahid Nawaz, Steno) (DB) Hon'ble Mr. Justice Shakeel Ahmad & Hon'ble Mr. Justice Dr. Khurshid Iqbal

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28-06-2024

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28-06-2024

29-06-2024

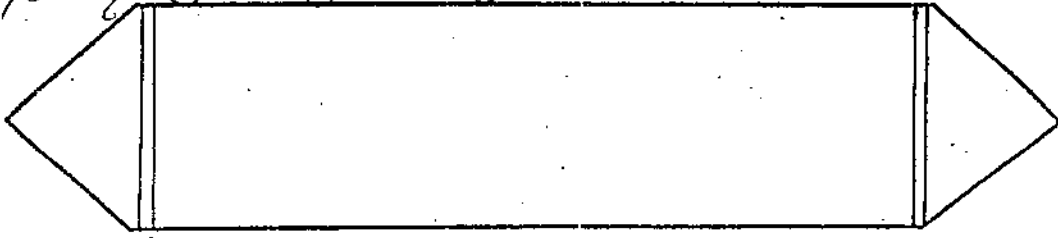
Rizayat

CERTIFIED TO BE TRUE COPY

EXAMINER
Peshawar High Court, Peshawar
Authorized Under Article 8, 7 of
the Qanoon-e-Majlisat Act 1974

20 JUN 2024

بعدالت جناب سر جسٹس ٹریبونل ہندو



2 جناب

بنام جنف سید سیدی

سید احمد خان

موزخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام دیپالپور کیلئے محمد اویس خان کٹنگوری

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر حالت ہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک دروپسار عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جان التوائے مقدمہ کے سبب سے وہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا اوکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم _____ ماہ _____ 2024ء

ATTESTED

کے لئے منظور ہے۔

بمقام

(Handwritten signature)

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