


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No.** 1464/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/09/2024	<p>The appeal of Mr. Abdullah Khan presented today by Mr. Amaad Nasir Kundi Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 19.09.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

Service Appeal No. 1464 /2024

Abdullah Khan  
VS

The Govt. of KP, through its Secretary, Elementary and Secondary Education  
Department, Civil Secretariat, Peshawar etc.

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Date: 16.09.2024

Applicant/Appellant

AMAAD NASIR KUNDI  
Advocate High Court, Peshawar

Office No.04, 2<sup>nd</sup> Floor, Juma  
Khan Plaza, Opposite Super  
CNG Filing Zone, Warsak  
Road, Peshawar.

0346-7865039

01

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

Service Appeal No. 1464 /2024

ABDULLAH KHAN, SENIOR CLERK (BPS-14), SDEO (F), Tehsil  
Takht-e-Nasrati, District Karak. .... Appellant

VERSUS

1. The Govt. of KP, through its Secretary, Elementary and Secondary Education Department, Civil Secretariat, Peshawar.
2. The Directorate, of Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar through its Director.
3. The District Education Officer (Female) District Karak.
4. Masroor Khan, Senior Clerk BPS-14, SDEO (F) Takht-e-Nasrati, Karak.

..... Respondents

APPEAL UNDER SECTION 4 OF THE KP SERVICE TRIBUNAL  
ACT, 1974

PRAYER:

ON ACCEPTANCE OF INSTANT APPEAL THE IMPUGNED OFFICE ORDERS DATED 29.08.2024 & 11.09.2024 MAY KINDLY BE SET-ASIDE WHEREBY THE RESPONDENT NO.02 HAS RESTORED THE OFFICE ORDER DATED 09.08.2024 AND THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED WITH NO GOOD GROUNDS AND WHICH IS AGAINST THE LAW, RULES AND IS LIABLE TO BE DECLARED VOID AB INITIO. MORE SO, DECLARED THE OFFICE ORDER DATED 27.08.2024 MAY KINDLY BE UPHELD. ANY OTHER RELIEF WHICH IS NOT ASK SPECIFICALLY AND THE AUGUST TRIBUNAL DEEMS FIT AND PROPER MAY ALSO BE GRANTED IN FAVOR OF APPELLANT.

Respectfully Submitted:

1. The marshal facts of the case, in the nutshell is that the appellant has been currently holding the post of UDC / Senior Clerk (BPS-14) by promotion since 2021 and was appointed as junior clerk w.e.f. 01.09.1986 accordingly. Since inception in service, he has been

performing his duties regularly with utmost devotion to the entire satisfaction of superiors. There is no previous history of Appellant regarding conduct, performance and efficiency and that is why his career is unblemished and clean and no stigma has been found.

2. At the very outset, prior to this unwelcome incident, the appellant has been transferred / posted from GHSS Bogara Karak to SDEO (F) Takht-e-Nasrati Karak by the order of Authority herein referred as Respondent No. 2 / Director, by the Office Order dated 29.05.2023 wherein he has been shown at serial No.1 and in pursuance of the *ibid* order, the Appellant has been duly complied with by means of assuming charge on 01.06.2023 accordingly.

(Copy of transfer / posting Office Order dated 29.05.2023 is Annex-A).

3. Astonishingly, having meritorious service record by means of after expiry of 04 months against the holding position, the appellant was upset by the harsh action of Respondent No. 3 herein referred as DEO (F) Karak and was transferred / posted from SDEO (F) Takht-e-Nasrati to DEO (F) Karak and complied the *ibid* order by means of transfer / posting office order 03.10.2023 without following any procedural law and thus, this departmental action was assailed by the Appellant qua duly filing Departmental Appeal which was Accepted and the Office Order Apropos To Posting / Transfer mentioned above in this para was Withdrawn by the same Authority vide office order dated 22.02.2024 accordingly.

(Copy of transfer / posting Office Order dated 03.10.2023 and Withdrawal order dated 22.02.2024 is Annex-B & C respectively).

4. More important to mention here, that the Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Peshawar has been imposed complete BAN over all kinds of posting / transferring of teaching and supporting staff due to commencement of academic session, vide Notification dated 29.06.2024 but the Respondent-Authority has been vehemently violated the aforesaid order and penalized by means of repeatedly transfer / posting.

(Copy of NOTIFICATION/ BAN Order dated 29.06.2024 is Annex-D).

5. Because, after the lapse of 05 months, the appellant has been again Pre-mature transferred / posted from SDEO (F) Takht-e-Nasrati to GHSS Warrana Karak vide Office Order dated 09.08.2024 which was challenged by the Appellant by means of duly filing Appeal and as a

result of the same, fate of Appeal has been decided in affirmative and RECALLED the ibid Office Order by issuing another Office Order dated 27.08.2024 accordingly. Needless to observe, one Mr. Masroor Khan Senior Clerk / Respondent No. 04 has been transferred / adjusted against the vacant post at GGHSS Dabali Lawaghar, Karak from SDEO (F) Takht-e-Nasrati in the interest of public service. In pursuance of the aforesaid order, the appellant has been made compliance accordingly and actualized the same. The aforesaid order has been passed upon approval of Competent Authority.

(Copy of impugned transfer Office Order dated 09.08.2024 and Recalling office order dated 27.08.2024 is Annex- E-F).

6. Interestingly, the Respondent No. 2-Director has been passed Office Order dated 29.08.2024 in its own capacity and no approval has been sought from Competent Authority as per their language of office order and RESTORED the Office Order pertaining to Posting / Transferring bearing Endst. No. 3158-65 dated 09/08/2024 which has been challenged by the Appellant by means of duly submitting Departmental Appeal / Representation to the Secretary E & SE herein after called Respondent No. 1 for redressal of grievance which was rejected / turned down without examining on record, and passed un-speaking order. The impugned rejection order has been passed on malice, contrary to law and rules, discriminative, mala fide and thus, the entire impugned departmental actions / inactions are liable to be set aside.

(Copy of Restored impugned transfer Office Order dated 29.08.2024 Annex-G and Departmental Appeal dated 02.09.2024 Annex-Hand Appellate Impugned Order dated 11.09.2024 is Annex-I).

7. That appellant feeling aggrieved and having no other remedy but to file the instant appeal on the following grounds amongst the others.

GROUND:

- A. That impugned action / inaction / omission of the respondents is apparent from the record and they are bent to deprive the appellant from his normal posting / transferring in an illegal manner which is liable to be set aside. The appellant was prematurely transferred without completing normal tenure which act of the Respondents is unlawful and illegal and liable to be set aside.
- B. That the impugned orders/notifications issued by the respondents is against the law, facts, norms of natural justice and in utter violation of posting / transfer policy hence liable to be set aside.

C. That the appellate impugned office order has been passed in utter violation of Section 24-A of the General Clause Act whereby the Authority is bound to pass any order with reason. This section imposed a mandatory obligation upon every executive and public authority that the order passed by such authority must not be brief and non-speaking. Law prescribe a minimum period during which employee must to serve at his post, however, it did not means that authority without assigning any reason must could move an officer from the place he was posted just after eight months or subject the officer through successive transfers in short period for this would amount to punishment. Reliance is placed on the reported judgment of 2024 PLC CS 65 (Quetta HC), 2018 SCMR 1411, 2023 PLC CS166 (AJK), 2023 SCMR 2119, 2023 PLC CS N53 GB CHIEF COURT (SHABINA KARIM VS PG THR. CS OF GB), 2022 SCMR 1387.

D. That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973. That no personal hearing whatsoever has been carried out prior to impost the instant punishment.

E. That the appellant has not been completed the normal tenure posting / transferring and he was repeatedly transferred / posted which is by itself punishment and cannot be overlooked in such like cases.

F. That the case of appellant falls in Premature transferring / posting and employ has a right to complete normal tenure and in sheer violation, is unconstitutional.

G. That the impugned order/notification is against the clauses I, II and XIV of the transfer/posting policy of the provincial Government of Khyber Pakhtunkhwa.

H. That the treatment meted out to the appellant is a clear violation of the Fundamental Rights of the appellant.

I. That the impugned orders / notifications and rejection order mentioned above is issued in utter disregard of E&D Rules, 2011 and judgment of the apex Court.

J. That the respondents acted in arbitrary and malafide manner by issuing the impugned orders / notifications against the appellant.

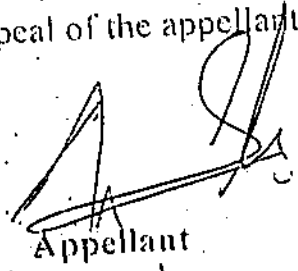
- K. That, the appellant has been discriminated by the respondents on the subject noted above and as such the respondents violated the Principle of Natural Justice.
- L. That neither the impugned orders / rejection order have not been issued in the public interest nor have the same been issued in exigencies of public service.
- M. That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

PRAYER:


It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Dated: 16.09.2024

Through:



Appellant



AMAAD NASIR KUNDI  
Advocate High Court,  
Peshawar

06

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

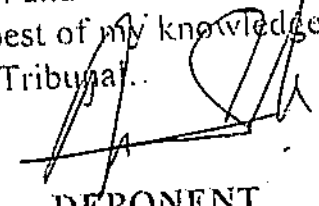
Service Appeal No. \_\_\_\_\_ /2024

Abdullah Khan  
VS

The Govt. of KP, through its Secretary, Elementary and Secondary Education  
Department, Civil Secretariat, Peshawar etc.

AFFIDAVIT

I, ABDULLAH KHAN, SENIOR CLERK, (BPS-14) SDEO (FEMALE), Tehsil  
Takht-e-Nasrati, District) Karak, do hereby solemnly affirm and declare that the  
contents of the Service Appeal are true and correct to the best of my knowledge  
and belief and nothing has been withheld from this August Tribunal.



DEPONENT  
CNIC: 14203-4274897-9



07

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

Service Appeal No. \_\_\_\_\_/2024

Abdullah Khan  
VS

The Govt. of KP, through its Secretary, Elementary and Secondary Education  
Department, Civil Secretariat, Peshawar etc.

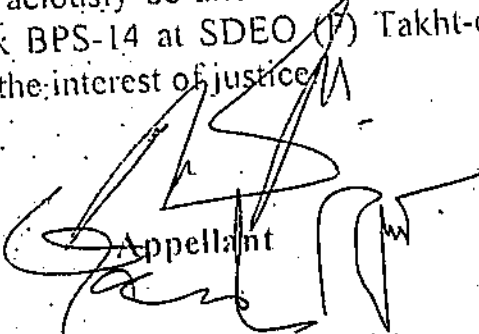
APPLICATION FOR INTERIM RELIEF

Respectfully Submitted:

1. That the applicant / appellant has filed the instant appeal in which no date of hearing is fixed yet.
2. That the appellant has got a prima facie case and is hopeful about its success.
3. That the balance of convenience also lies in favor of the appellant.
4. That if the application is not allowed the applicant will suffer irreparable loss.
5. That the entire impugned departmental office orders have been passed in absence of mandatory and procedural law, thus, the same is void and without lawful authority and liable to be set aside.

It is, therefore, most humbly prayed that on acceptance of this application, the operation of the impugned office orders whereby the Appellant has been upset may kindly be suspended till the decision of instant Appeal and the appellant may graciously be allowed to continue his duty against the post of Senior Clerk BPS-14 at SDEO (P) Takht-e-Nasrati, Karak without any hindrance in the interest of justice.

Through:

  
Appellant  
AMAAD NASIR KUNDI  
Advocate High Court,  
Peshawar

08  
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

Service Appeal No. \_\_\_\_\_ /2024

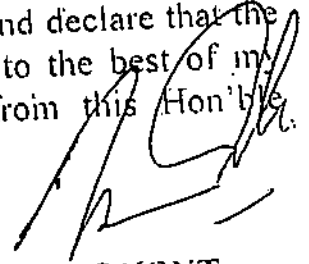
Abdullah Khan

VS

Govt. of KP via Secretary, E&SE Department

AFFIDAVIT

I, ABDULLAH KHAN, SENIOR CLERK, (BPS-14) SDEO (FEMALE), Tehsil Takht-e-Nasrati, District) Karak, do hereby solemnly affirm and declare that the contents of the accompanying Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



DEPONENT

CNIC: 14203-4274897-9



09

Annex A

**OFFICE ORDER**

The Posting/Transfer in respect of the following Ministerial Staff is hereby ordered in their own pay and BPS in the interest of public service with effect from the date of their taking over charge.

S. #	Name/Design:	Present Posting	Adjusted at	Remarks
1	Mr. Abdullah S/C	GHSS Bogara Karak	SDEO(F) Takhti Nasrati Karak	Vice S.No.2
2	Mr. Irshad S/C	SDEO(F) Takhti Nasrati Karak	GHSS Bogara Karak	Vice S.No.1
3	Mr. Tariq Parvez J/C	GHSS Nari Panos Karak	At Disposal of Director (DPD) KP	For further adjustment at RPDC Male Karak

Note:-

1. Compliance report should be submitted to all concerned.
2. No TA/DA etc is allowed.
- 3.

**DIRECTOR**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst: No. 8029-32 F.No. IA-23/MS/G.Transfer/May/2023. Dated 29/05/2023

Copy forwarded to:-

1. Director, Directorate of Professional Development KPK.
2. District Education Officers (M/F) Karak.
3. District Account Officer Karak.
4. Principal/Headmistress concerned.
5. Officials concerned.
6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
7. Master File.

**Assistant Director (Admn)**  
Directorate E& Secondary Education  
Khyber Pakhtunkhwa Peshawar



OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK

F  
Annex B

10

OFFICE ORDER

The posting/transfer in respect of the following officials are hereby ordered in their own pay and BPS with effect from the date of their taking over charge.

S.NO	NAME/DESIGN:	PRESENT POSTING	TRANSFER ADJUSTED AT	REMARKS
1	Abdullah Khan S/Clerk	SDEO Female Takhti Nasrati Karak	DEO (F) Karak	As per reported by the SDEO Female Takhti Nasrati Karak vide Endost No. 105-07 dated 30.09.2023. The official concerned is hereby adjusted against the vacant post of Assistant at DEO Female Karak
2	Mr Abdul Nabi S/Clerk	DEO Female Karak	SDEO Takhti Nasrati Karak	Vice S.No 1

Note:

1. No TGA/DA is allowed.
2. Charge report should be submitted to all concerned
3. Mr Abdullah Khan S/Clerk is hereby directed to perform their duty at GGHS Waranah Masakan karnik

District Education Officer  
(Female Karak).

Dated 05/10/2023

Endst: No 9540 /Clerk  
Copy to the:

1. District Account Officer (F) Karak
2. Concerned principals.
3. SDEO Takhti Nasrati Karak
4. Official Concerned

District Education Officer  
(Female Karak).

05/10/2023



OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK

69 11

Annex - C

OFFICE ORDER

As Per Writen Appeal (regarding wrongly adjustment) by Mr Abdullah Khan Senior Clerk temporary adjusted at GGHS Waruna Masakan is hereby accepted his transfer order issued vide this Office Endst: No 9540 /Clerk dated 03:10.2023 is hereby withdrawn in the best interest of public service.

Note -

1. No TGA/DA is allowed.
2. Charge report should be submitted to all concerned.

~~District Education Officer  
(Female Karak)~~

Endst: No 129 /Clerk  
Copy to the:

Dated 22 /02/2024

1. District Account Officer Karak
2. Concerned principals.
3. SDEO Takthi Nasrai Karak
4. Official Concerned

~~District Education Officer  
(Female Karak)~~

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

Block "A" Opposite MPAs Hostel, Civil Secretariat Peshawar  
No. 091-9223533 Email: [education@go-pk.gov.pk](mailto:education@go-pk.gov.pk)



Date: Peshawar, the 29<sup>th</sup> June, 2024

**NOTIFICATION**

**NOTIFICATION & SECTION: MW/1-1734-** Consequent upon the commencement of Academic

Session, the Competent Authority is pleased to impose complete ban on all kinds of posting/transfers of Teaching and supporting staff in Elementary & Secondary Education Department in large interest of the students with immediate effect and till further orders, except the posting/adjustment orders to be made in connection with:-

1. Management Cadre
2. Appointment through Public Service Commission
3. Promotion through PSB or DPC
4. Mutual transfer
5. Court Cases

**SECRETARY/GOVT OF KHYBER PAKHTUNKHWA  
E&S DEPARTMENT**

Number of copy No. & Date

Copy forwarded to the:

1. PS to Minister for E&S Department
2. Accountant General, Khyber Pakhtunkhwa, Peshawar
3. The Director, E&S Khyber Pakhtunkhwa, Peshawar
4. The Director, BMS E&S Department
5. All District Education Officers (Male/Female) Khyber Pakhtunkhwa
6. District Accounts Officer Khyber Pakhtunkhwa
7. PS to Secretary E&S Department
8. PS to Special Secretaries (Plan/Develop) E&S Department
9. PS to Additional Secretaries (General) E&S Department
10. PA to Deputy Secretary (Estab) E&S Department
11. PA to Deputy Secretary (Admin) E&S Department
12. Master File

**DEPUTY SECRETARY (ESTABLISHMENT)  
(NAVALI DIAL SHAH)**

29/06/2024

*[Handwritten signature]*

*[Handwritten initials]*

BETTER COPY

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

Block "A" Opposite MPA's Hostel, Civil Secretariat Peshawar

No. 091-9225344 Email: ddadmin.ese.@gmail.com

Dated Peshawar the 29<sup>th</sup> June, 2024

**NOTIFICATION**

**NO.SO(S/M)E&SED/Gen.Misc/11-1/24:-** Consequent upon the commencement of Academic Session, the Competent Authority is pleased to impose complete ban on all kinds of posting/transfers of Teaching and supporting staff in Elementary & Secondary Education Department in large interest of the students with immediate effect and till further orders, except the posting/adjustment orders to be made in connection with:-

1. Management Cadre.
2. Appointment through Public Service Commission
3. Promotion through PSB or DPCs.
4. Mutual transfer
5. Court Cases

**SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT**

**Endst: of even No. & Date**

Copy forwarded to the:-

1. PS to Minister for E&SE Department.
2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. The Director, E&SE Khyber Pakhtunkhwa, Peshawar.
4. The Director, EMIS, E&SE Department.
5. All District Education Officers (Male/Female) Khyber Pakhtunkhwa.
6. District Accounts Officer Khyber Pakhtunkhwa.
7. PS to Secretary E&SE Department.
8. PS to Special Secretaries (Estab/Develop) E&SE Department.
9. PA to Additional Secretaries (Gen/Estab) E&SE Department.
10. PA to Deputy Secretary (Estab) E&SE Department.
11. PA to Deputy Secretary (Admn) E&SE Department.
12. Master File.

-Sd/-

**(NAVEED ULLAH SHAH)  
DEPUTY SECRETARY  
(ESTABLISHMENT)  
Khyber Pakhtunkhwa Peshawar**



To be substitute bearing name No and Distric  
**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION**  
**KHYBER PAKHTUNKHWA PESHAWAR**  
 Phone: 091-3225344  
 Email: education@kpk.gov.pk

**Office Order**

Consequent upon approval of the competent authority transfer/adjustment in respect of the following officials are hereby ordered on their own pay and BPS in the interest of service with effect from the date of their taking over charge.

S.#	Name/Design:	Present Posting	Adjustment at	Remarks
1	Mr. Masroor Khan Senior Clerk BPS-14	GHSS Warana District Karak	SDEO (F) Takht-e-Nasrati District Karak	See S.No 2
2	Mr. Abdullah Senior Clerk BPS-14	SDEO (F) Takht-e- Nasrati District Karak	GHSS Warana District Karak	See S.No 2

**Note:-**

1. Compliance report should be submitted to all concerned.
2. No TADA etc is allowed.

**DIRECTOR**  
 Elementary & Secondary Education  
 Khyber Pakhtunkhwa, Peshawar

Endst. No. 3158-65 /F.No/A-23/M3/Transfer/Karak/Vol-II

Dated Peshawar the 09/08/2024.

**Copy forwarded to the:-**

1. District Education Officer (Male/Female) Karak.
2. District Accounts Officer Karak.
3. SDEO (F) Takht-e-Nasrati Karak.
4. Principal/HM Concerned.
5. Officials concerned.
6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
7. Master file.

**Assistant Director (Admin)**  
 Elementary & Secondary Education  
 Khyber Pakhtunkhwa, Peshawar



BETTER COPY

To be substitute bearing same No. and Date  
**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION**  
**KHYBER PAKHTUNKHWA PESHAWAR**

Phone: 091-9225344

Email: ddadmin.es.e.@gmail.com

Office Order

Consequent upon approval of the competent authority transfer/adjustment in respect of the following officials are hereby ordered on their own pay and BPS in the interest of public service with effect from the date of their taking over charge.

S. #	Name/Design:	Present Posting	Adjustment at	Remarks
1	Mr. Masroof Khan Senior Clerk BPS-14	GHSS Warana District Karak	SDEO (F) Takht-e- Nasrati District Karak	Vice S. No.2
2	Mr. Abdullah Senior Clerk BPS-14	SDEO (F) Takht- e-Nasrati District Karak	GHSS Warana District Karak	Vice S. No.1

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. 3158-60/F.No./A-23/MST/Transfer/Karak-Vol-II

Dated Peshawar the 09/08/2024

Copy forwarded to the:-

1. District Education Officer (Male/Female) Karak.
2. District Accounts Officer Karak.
3. SDEO (F) Takht-e-Nasrati.
4. Principal/HM Concerned.
5. Officials concerned.
6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
7. Master File.

-Sd/-

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



**OFFICE ORDER**

Consequent upon approval of the competent authority, this Office Order Under Endst: No. 3158-65 dated 09/08/2024 is hereby recalled, while Mr. Masroor Khan, Senior Clerk under transfer to SDEO (F) Takht-e-Nasrati, Karak is hereby transferred/adjusted against the vacant post of Senior Clerk at GGSS Dabali Lawagar, Karak on 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.
2. No TA/DA is allowed

**DIRECTOR**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst: No. 1798-1800 /F.No. /A-23/MS/Transfer/Karak/Vol-II.  
Dated Peshawar the 27/08/2024

**Copy forwarded to the:**

1. District Education Officer (M/F), Karak.
2. District Accounts Officer, Karak.
3. SDEO (F) Takht-e-Nasrati, Karak.
4. Principal/HM Concerned.
5. Officials concerned.
6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
7. Master file.

*A. Bannuzal* 27/08/2024  
Assistant Director (Admin)  
Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar



**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION**  
 (KHYBER PAKHTUNKHWA PESHAWAR)  
 Phone: 091-9225347  
 Email: assistantdirectoradme@gmail.com

Office Order

Consequent upon approval of the competent authority (Director Elementary & Secondary Education Khyber Pakhtunkhwa), this office order under Endst. No. 7799-7800 dated 27/08/2024 is hereby recalled and this office order under Endst. No. 3156-55 dated 09/08/2024 is hereby restored.

**DIRECTOR**

Elementary & Secondary Education  
 Khyber Pakhtunkhwa, Peshawar

Endst. No. 8879-83 / F.No. A23/MS/Ttransfer/karak/Vol-II

Dated Peshawar the 29/08/2024

Copy forwarded to the:

- 1. District Education Officer (Male/Female) Karak
- 2. District Accounts Officer Karak
- 3. SDO (F) Tskil-e-Nasrati Karak
- 4. Principal/HM concerned
- 5. Officials concerned
- 6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
- 7. Master file

Assistant Director (Admin)  
 Directorate of E&SE K.P. Peshawar

17  
 Annex-5

18  
BETTER COPY

To be substitute bearing same No. and Date  
**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBERPAKHTUNKHWA PESHAWAR**

Phone: 091-9225344

Email: assistantdirectoradmess@gmail.com

Office Order

Consequent upon approval of the competent authority (Director Elementary & Secondary Education Khyber Pakhtunkhwa) this office order under Endst: No.7798-7800 dated: 27/08/2024 is hereby recalled and this office order under Endst: No.3158-65 dated 09/08/2024 is hereby restored.

--Sd--

**DIRECTOR**

Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst: No. 8879-83/F.No.A-23/MS/Transfer/Karak/Vol-II

Dated Peshawar the 29/08/2024

Copy forwarded to the:

1. District Education Officer (Male/Female)-Karak.
2. District Accounts Officer Karak.
3. SDEO (F) Takht-e-Nasrati.
4. Principal/HM Concerned.
5. Officials concerned.
6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
7. Master File.

-Sd/-

Assistant-Director (Admn)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

To:

The Secretary,  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

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Annex - H

Subject: DEPARTMENTAL APPEAL

Respected Madam,

Mostly humbly it is submitted that I am serving in Education Department since 01-09-1986 I have performed my duties with zeal and honesty.

2. I was transferred to office of SDEO (F) Takht-e-Nasrati District Karak vide Secretary Elementary & Secondary Education Order No. 8029-32 dated 29-05-2023 and assumed the charge of the post of Senior clerk as on 01-06-2023.

3. After laps of 04 months, I was transferred from SDEO (F) Takht-e-Nasrati to DEO (F) District Karak Vide DEO (F) Karak order No. 9540 dated 03-10-2023. Feeling aggrieved from premature transfer, I submitted Departmental Appeal to DEO (F) Karak and after perusal of my appeal, the transfer order issued vide DEO (F) Karak No. 9540 dated 03-10-2023 was withdraw vide DEO (F) Karak No. 129 dated 22-02-2024.

4. Now, after laps of 05 months I have been again transferred from SDEO (F) Takht-e-Nasrati to GHSS Warana (Karak) vide Secretary E&SE KP No. 3158-65 dated 09-08-2024. In this regard I submit departmental appeal to Secretary E&SE KP vide Endst. 666 dated 27-08-2024. The authority has withdrawn and issue order No. 7798-7800 dated 27-08-2024.

5. My order was once again canceled/restored after one day order vide. No. 8879-83 dated 29-08-2024.

6. It is requested that my this instant Departmental Appeal may kindly be accepted on the above ground that I have not completed my normal tenure and neither there is no departmental proceeding against me therefore, the order issued vid No. 8879-83 dated 29-08-2024 may very kindly be set aside please.

Photocopies of all transfer orders attached.

Yorn Obediently

Abdullah Khan  
Senior Clerk

SDEO (F) Takht-e-Nasrati District Karak  
CNIC: 14203-4274897-9



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**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**  
**CIVIL SECRETARIAT PESHAWAR**  
**(PHONE NO. 091-9223540)**

SO (P/F)/E&SED/2-1/appeal/Abdullah Khan Sr.Clerk/Karak/2024  
Dated Peshawar the, 11<sup>th</sup> September, 2024

To

The Abdullah Khan, Senior Clerk,  
SDEO (F) Takht-e-Nasrati,  
District Karak.

*Rej order*

Subject: - DEPARTMENTAL APPEAL.

I am directed to refer to your departmental appeal No. Nil dated 09-09-2024 on the subject noted above and to state that the same was examined / processed and regretted by the Competent Authority being not covered under the rules, please.


  
(NIZAMUD-DIN)

SECTION OFFICER (PRIMARY FEMALE)

Endst: of even No & date

Copy forwarded to the: -

1. District Education Officer (F) Karak.
2. PS to Secretary, E&SE Department Khyber Pakhtunkhwa.

  
SECTION OFFICER (PRIMARY FEMALE)

**VAKALATNAMA**

**BEFORE THE HON'BLE**

*K.P. Service Tribunal Peshawar*

*Abdullah*

**VERSUS**

*Sec. E & SE*

I/We, *Abdullah* do hereby appoint **AMAAD NASIR KUNDI** Advocate, High Court, to appear in the above titled appeal/suits etc and to do all the following acts, deeds and things on my/our behalf.

- To appear, act and plead for me /us in the above mentioned case in this court/ Tribunal or in which the same may be tried or heard and any other proceedings arising out of or connected herewith.
- To assign, verify and file appeals, suits, affidavits and application for compromise or withdrawal or for referring to arbitration of the said case as may be deemed necessary or advisable by clients for the conduct, prosecution or defense of the said case at all its stage.

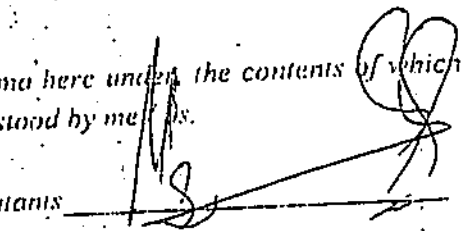
AND hereby agree:-

- That the advocates shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fee remained unpaid.
- Not to hold the advocate(s) responsible if he said case be proceeded ex-parte or dismissal in default in consequence of his / their absence from the court/ Tribunal when it is called for hearing.

*In witness whereof / we have signed this Vakalatnama here under, the contents of which have been read/explained to me / us and fully understood by me / us.*

Accepted by:-

Signature of the executants



**AMAAD NASIR KUNDI**

Advocate High Court, Peshawar  
 Office No. 4, 2nd Floor, Juma Khan Plaza,  
 Near FATA Secretariat,  
 Opp; Super Gas CNG Pump, Warsak Road,  
 Peshawar  
 0346-786 5039  
 0312-2656644  
 CC No. 09-0795  
 Email: [amaadkundi786@gmail.com](mailto:amaadkundi786@gmail.com)