


# FORM OF ORDER SHEET

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

**Appeal No.** 1669 /2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27 /09/2024	<p>The appeal presented today by Mr. Muhammad Muazzam Butt Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 03.10.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman  REGISTRAR</p>

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA

A. NO. 1669/2024  
IKRAM ULLAH

V/S

Government of KP & others

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ADVOCATE  
M. Muazzam Butt

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA**

In Ref to

Service Appeal No. 1669 /2024

Ikram Ullah Son of Muhammad Afzal, PSHT  
GPS Nimaz Kot, Tehsil & District Timargara

.....Appellant

**VERSUS**

- 1) Secretary to Government of Khyber Pakhtunkhwa, Establishment Department, Civil Secretariat, Peshawar
- 2) Secretary to Government of Khyber Pakhtunkhwa, Elementary and Secondary Education Department, Civil Secretariat, Peshawar
- 3) Director Elementary and Secondary Education Department, Civil Secretariat Near MPA Hostel, Peshawar

.....Respondents

**SERVICE APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT 1974. AGAINST THE IMPUGNED NOTIFICATION BEARING NO.SO(POLICY)E&AD/1-3/2020. DATED 06/08/2020. COMMUNICATED TO RESPONDENT NO. 2 VIDE LETTER DATED 06/06/2023. WHEREIN IT WAS STATED THAT SUB RULE 5 OF RULE 7 OF KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION AND TRANSFER) RULES, 1989 STANDS DELETED**

**PRAYER:**

**ON ACCEPTANCE OF INSTANT SERVICE APPEAL, THE IMPUGNED NOTIFICATION BEARING NO: SO (POLICY) E&AD/1-3/2020. DATED 06/08/2020. COMMUNICATED TO RESPONDENT NO. 2 VIDE LETTER DATED 06/06/2023. MAY BE DECLARED AND ORDERED TO BE STRUCK DOWN BEING VOID AND ULTRA VIRES TO THE CONSTITUTION OF PAKISTAN AND FUNDAMENTAL PRINCIPLES OF NATURAL JUSTICE AND AGAINST THE RIGHTS OF APPELLANT.**

**ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEMS FIT AND PROPER IN THE CIRCUMSTANCES OF THE CASE MAY ALSO BE GRANTED TO THE APPELLANT.**

**RESPECTFULLY SHEWETH:**

- 1. That the Respondents Department appointed the Appellant as Primary School Head Teacher.  
Copy of Appointment letter is annexed as **Annexure A**

2. That as per Khyber Pakhtunkhwa (Appointment/ Promotion/ Transfer) Rules, 1989, as well as in other sister services of the other Provinces and Federation as well, availing of promotion by the employees is always optional and the employees as a matter of right may avail or forego their promotion and the next employee in seniority list is to be promoted.
3. That some employees specifically have foregone their promotion as they could not serve in the areas where there is no facility of accommodation and no houses of their elders are available to look after them in far-flung and solitary mountainous hard areas, and as per Section 25 of per KP Civil Servant Act, 1973, rules to the extent of terms and condition is framed by the Chief Minister and such promotion rules are not made applicable with retrospective effect. The rules framed are published in the Gazette notification and part and parcel of KP Civil Servant Appointment, Transfer and Promotion Rules 1989.
4. That Government of K.P without following the rules position mentioned in Para 6 above promulgated Notification No. SO (Policy) E&AD/1 3/2020, dated 06/08/2020, communicated to Respondent No.2 vide letter dated 06/06/23 wherein it has been made mandatory to the employees to avail the promotion, otherwise, disciplinary action shall be taken against the employees. The impugned Notification is reproduced as under:-

**"Furthermore, those officers/officials who do not comply with promotion order of the competent authority or try to evade promotion through different means shall be proceeded against under Khyber Pakhtunkhwa Civil Servants (Efficiency Discipline) Rules, 2011, please".**
5. That as per notification No. SD (Policy) /EDAD/1- 3/2020 dated 06/08/2020, the right of foregoing of promotion was withdrawn and the Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) deleted Rule 7(5) in the Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 vide notification no SOR-VI (E & AD)/1-2/2020 dated 06-08-2020. Copy of Impugned notification No. SD-(Policy) EV AD/1- 3/2020 dated 06/08/2020 is attached as **Annexure B**
6. That the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar, asked for guidance regarding deletion of Rule 7(5) in Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 in respect of which the respondent No. 1 vide its letter No. SO(Policy) E&AD/1-3/2020 dated Peshawar the June 06th, 2023 directed the respondent No 3 (Directorate of Elementary & Secondary Education) that Rule 7(5) in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 has been deleted vide notification dated 06-08-2020 and ,therefore, no provision exists to decline or forgo promotion and it is obligatory upon every civil servant to accept promotion under every condition. Copy of Impugned Letter dated June 06th, 2023 is attached as **Annexure C**
7. That thereafter the meeting was also held in the office of Additional Secretary Establishment on 06-07-2023 in which it was decided to examine the case properly and submit a self-contained/ consolidated case for onward submission to the Establishment Department for further necessary action. Copy of Minutes of Meeting dated 06-07-2023 is attached as **Annexure D**
8. That the Respondent No.3 i.e. Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa also wrote a letter to the office of Establishment & Administrative Department vide No SO(Primary-M) E&SED/2-2/Appointment Rule/2023 dated 23-08-2023 to reconsider the amendment made in Khyber

Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 as it had negatively affected a large number of teachers and especially female teachers. Copy of Letter dated 23-08-2023 is attached as Annexure E

9. That the respondent vide its letter dated 07th of September 2023 directed the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa that necessary guidance has already been provided to the department and therefore no provision exists to decline or forgo promotion and those teachers who do not comply with the promotion order of the competent authority or try to evade promotion through different means shall be proceeded under the Khyber Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules, 2011. Copy of Impugned letter dated 07-09-2023 is attached as Annexure F
10. That the petitioner feeling aggrieved, filed Representation to the respondents in person, and also approached to respondents through APTA President but the grievances of the appellant have not so far been redressed. Copy of Representation against the said notification is annexed as Annexure G & H
11. That feeling aggrieved from the letters dated 06-06-2023 and 07-09-2023 and the deletion of Rule 7(5) in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989; the petitioners filed this Hence, the instant service appeal is filed on the following grounds:-

**GROUNDS:-**

- a. That as per various judgments it is established and settled principle that executive notifications cannot be given retrospective effect. A valid Notification which confers rights is always applicable with prospective effect, however, if an amendment notification that adversely effects the interests of the employees or causes disadvantage to the employee is not tenable in the eyes of law. The notification/guidance dated 06/08/2020 06/06/2023 are liable to be set-aside.
- b. That there are no terms and conditions of service mentioned in the appointment order of the appellant wherein, availing of promotion is mandatory. It is further submitted that employees in the past, have foregone their promotion along with their posting. It is submitted that when domestic and other personal issues do not permit the employees/appellant to avail the promotion order and in that case, the employees who foregone their promotion were allowed not to avail the promotion for a period of 04 years and on second refusal the employees were permanently debarred from availing the facility of promotion during their entire service. Hence the employees himself/herself forebear agonies of foregoing their promotions. As a result, junior to the appellant according to the order of seniority cum fitness are granted promotion to next rank.
- c. That as per Civil Servant laws, promotion is a kind of appointment which is always optional to get promotion or not, hence the impugned notification is void, illegal and against the law and the same to the extent of the appellant is liable to be set-aside.
- d. That it is further submitted that on account of grant of promotion, some employees who are suffering from severe medical ailment or facing acute domestic issues cannot avail promotion with transfer in other areas, therefore, no employee can be compelled to accept the promotion compulsorily which is not beneficial to the employee but if an employee does not avail and get benefit of her promotion it must be optional for the employees as to whether to avail or forego the benefits. Any promotion without willingness of employee is illegal and liable to be setaside.

- c. That non-availing of promotion and foregoing thereof does not cause loss to the government exchequer and in consequence of foregoing promotion, pave way to the next employee in seniority, aspiring for promotion could be promoted.
- f. That the impugned promotion Notification dated 06/08/2020 communicated on 06/06/2023 is perverse, discriminatory, against the law, pungent and is a blunt blow of hammer on the rights of the appellant. It is not out of place to mention here that the appellant are teachers and have to look after their children as well as ailing dependent family members and in these circumstances in the presence of impugned Notification dated 06/08 /2023 communicated on 06/06/23 would not be able to serve in the department and which shall amount to the snatching of bread and butter of the poor employees


**It is, therefore, humbly prayed that on the acceptance of the instant Service Appeal; the impugned Notification bearing No. SO (POLICY) E&D/1-3/2020 DATED 06/08/2020, communicated to Respondent No.2 by Respondent NO.1, vide letter dated 06/06/2023, may please be declared and ordered to be struck down being Void, Ultra vires to the Constitution of Pakistan and against the fundamental principles of natural justice.**


**It is further prayed that no penal action as proposed and envisaged in letter dated 06/06/2023 may be declared as unlawful, illegal and without having any legal effect.**

**Any other relief, which this honorable Tribunal deems fit and proper in the circumstances of the case, may also be granted to the appellant.**

**AFFIDAVIT:**

I, (the appellant) solemnly declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

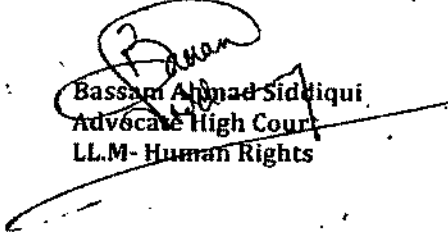
  
Deponent

  
Appellant

Through

  
Muhammad Muazzam Butt  
Advocate Supreme Court

  
Muhammad Adeel Butt  
Advocate High Court

  
Bassam Ahmad Siddiqui  
Advocate High Court  
LL.M- Human Rights

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**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA**

C.M No \_\_\_\_\_ -P of 2024

In Ref to

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

**IKRAM ULLAH**  
**VERSUS**

Secretary to Government of Khyber Pakhtunkhwa, & others

**APPLICATION FOR SUSPENSION OF IMPUGNED NOTIFICATION BEARING NO. SO (POLICY) E&D/1-3/2020 DATED 06/08/2020, COMMUNICATED TO RESPONDENT NO.2 BY RESPONDENT NO.1, VIDE LETTER DATED 06/06/2023 TILL THE FINAL DISPOSAL OF CASE IN HAND.**

Respectfully Submitted:-

1. That the instant application may be treated as part and parcel of service appeal of the appellant.
2. That the appellant has brought a good prima facie case and balance of convenience also lies in favor of the appellant.
3. That there is likelihood success of the appellant in the lis. And if the notification bearing No. So (Policy) E&D/1-3/2020 Dated 06/08/2020, communicated to Respondent No.2 by Respondent No.1, Vide Letter Dated 06/06/2023 is not suspended the appellant would suffer irreparable loss.
4. That valuable rights of the appellant is involved in the case.


In view of the reasons, it is humbly requested that the notification bearing No. So (Policy) E&D/1-3/2020 dated 06/08/2020, communicated to Respondent No.2 by Respondent No.1, Vide Letter Dated 06/06/2023 may kindly be suspended till the final disposal of the main appeal in hand.

**AFFIDAVIT:**

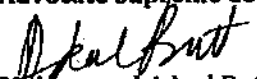
I (the appellant) do hereby solemnly stated on oath that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court

  
Deponent

Through

  
Appellant

  
Muhammad Muazzam Butt  
Advocate Supreme Court

  
Muhammad Adeel Butt  
Advocate High Court

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) PRY: DIR AT TIMERGARA.  
NOTIFICATION:-

Consequent upon the selection committee, the District Education Officer (M) Pry: Dir at Timergara has been pleased to appoint the following trained P.T.C. Candidates at the schools noted against their names in BPS, NO. 7 (Rs. 1480-81-2695 plus usual allowances) as admissible under the rules with immediate effect subject to the existing terms and conditions:-

SNO.	Name, Father's Name & Address.	D/O	Birth NO	of School	Where	Remarks.
1.	Mumtaz Ahmad, S/O Rehankot.	4.5.67	1/85	GPS: Balu	Post already acc:	
2.	Mohd Yaqob, Dir.			Ghanshal		
3.	Saleh Jan S/O Faiz Akbar R/O Sher Khani.	3.5.67	2/87	GPS: Shekhan	V: Mod Hayat not Selected on merit	
3.	Muhammad Zahir Shah S/O Ghulau Qadir. R/O Sheringal.	7.4.75	3/85	MPS: Qohar.	Post all: accup:	
4.	Bakht Shah Zeb S/O Jehan Zeb R/O Khungi Dir.	4.4.66	4/80	GPS: Dab Baghi Baran	-do-	
5.	Shawkat Hayat S/O Asfan Yar R/O Kalkot.	20.8.75	5/78	GPS: Pashrak.	/do-	
6.	Waris Khan S/O Abdul Hamid R/O Kityarai.	23.2.77	7/75	GPS: Liko Badwan	Vice Anwar-Badshah. Not Selected on merit	
7.	Fazal Jalil S/O Fazal Bari R/O Cuch.	15.3.73	8/73	GPS: Barorai	Vice Faiz Talab not selected on M:	
8.	Anwar Ali S/O Sirajul Haq R/O Khungi Dir.	22.6.73	9/72	GPS: Islam Gat	Vice Qayoumul-Haq. - do -	
9.	Faridullah S/O Hanifullah R/O Kandaro Dir.	6.3.71	10/72	GPS: Safari	Vice Muhammad Riaz not selected: T.MKD: - do -	
10.	Irshad Hussin S/O Mohd Khan R/O Sarai Bala.	15.8.69	11/72	GPS: Kamangara	Vice Javid Israr Terminated. - do -	
11.	Qamar Dost S/O Abdul Wahid R/O Kandaro.	1.5.69	12/72	GPS: Mian Banda	Vice Hayatullah Terminated. - do -	
12.	Azir Muhammad S/O Fatch, Hazrat R/O Ktan.	2.1.75	13/72	GPS: Katap	Vice Mohd Faraz Terminated. - do -	
13.	Hamidullah S/O Fazal Khaliq R/O Sangolai.	3/9.75	14/72	GPS: Sangolai	Vice Mohd Ikram Terminated. - do -	
14.	Muhammad Ilyas S/O Habib Said R/O Shikawlai.	1.6.72	17/71	GPS: Sangar	Vice Janbar Khan Terminated. - do -	
15.	Muhammad Shawkat S/O Rahim Dad R/O Sarai Bala.	10.1.75	18/71	GPS: Chinar (T)	Vice Azizul Haq Terminated. - do -	
16.	Sami Allah S/O Rabi Mal-Shah R/O Shahzadi.	18.1.75	19/71	GPS: Tawdachina	Vice Sikaandar Shah Term: - do -	
17.	Javidullah S/O Zigravar R/O Haji Abad.	16.2.73	20/71	GPS: Kumbhar	Vice Mumtaz Khan Terminated. - do -	
18.	Amir Afsar S/O Azizur Rahman R/O Jabar.	6.4.74	21/71	GPS: Godei-Khwar.	Vice Rahim Khan Terminated. - do -	
19.	Ubidullah S/O Rnh Zamir Khan R/O Kano Shamsikhani.	1.4.74	22/71	MPS: Razi, Banda	Vice Azal-R. Term: - do -	
20.	Muhammad Rasool Khan S/O Muhammad Aziz Khan R/O Kambat.	15.9.70	24/71	GPS: Nawi Kalai	Vice Bakht-shah Zeb Ter: - do -	



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21. Shamsul Wahab S/O Abdul Wahab, R/O Rabia Abad.	1.3.75	23/71	GPS: Chanyar Kass	Vice Sal- Moor Ter:
22. Rafiqul Haq S/O Jamiul Haq R/O Kanbat.	3.3.74	25/71	MPS: Debraho.	V: Sultan- Muhammad Ter:
23. Tassimul Alam S/O Shamsul Alam R/O Rehankot.	1.4.76	26/71	MPS: Binr Bayari	Post Alre- ady accu:
24. Muntaz Muhammad S/O Badshah Muh- ammad R/O Shaw Bir.	6.6.74	28/71	GPS: Barikot (Dir)	V: Akun Sha: Terminated- Post All- ready acco:
25. Noorul Hassan S/O Muhammad Islam R/O Kulalano.	3.1.75	29/70	GPS: Banda (M)/ 2P:	Vice Faizul- Hassan Ter: Vice hghar Khan Ter:
26. Ashfaqur Rahman S/O Saeed Khan R/O Badwan.	15.3.73	30/70	GPS: Ouch No. 3	Vice Muhammad Rashid Ter:
27. Rahmat Khan S/O Said Ahmed Khan R/O Khuni Dand.	9.2.74	31/70	MPS: Awi Shah	V: Shah Wali Terminated V: Ali Rahman Terminated V: Bahdar- Khan Term:
28. Khan Muhammad S/O Yar Muhammad R/O Chakdara.	14.3.73	32/70	GPS: Kass Wargher	V: Misbahu- llah Term:
29. Muhammad Din Khan S/O Habibur Rahman R/O Khosano Baba.	2.1.71	33/70	GPS: Kass Wargher	V: Muhammad Asadullah Ter:
30. Muhammad Hayat Khan S/O Muhammad- Shuib R/O Tarnaw.	8.4.75	34/70	GPS: Shahgai- Sia.	V: Jehanalam Post All: Acco:
31. Khista Rahman S/O Inayatpur Rahman R/O Khir Abad.	15.3.75	35/70	GPS: Ghaligai (R)	V: Umer Bad- Bad Shah Ter:
32. Sarbiland Khan S/O Muhammad Zarin R/O Siar.	25.5.73	36/70	GPS: Kair.	P: All: Acc:
33. Ayazur Rahman S/O Ubidur Rahman Rohan Kot.	6.2.73	37/70	GPS: Guma Dand.	V: Rahatulla: Term:
34. Muhammad Usman S/O Habib Said R/O Shikwalai.	1.6.72	38/70	GPS: Sor Dam.	V: Faqir- Muhammad Te:
35. Fazal Walai S/O Fazal Wadood R/O Warei.	1.3.77	39/70	GPS: Sondal	V: Jehan- Dastagir Te:
36. Aatur Rahman S/O Faizur Rahman R/O Warei.	1.3.73	40/70	GPS: Serai Nihag	V: Rohul Ami: Term:
37. Hamayoon Khan S/O Said Gul R/O Sadoo.	25.5.72	41/69	GPS: Khushmuqam (M)	P: All: Acc:
38. Nahid Shah S/O Qazi Muhammad R/O Khungi.	8.5.72	42/69	GPS: Charkoon (B)	P: All: Acc:
39. Hanifullah S/O Muhammad Rasool R/O Shah Zadai.	1/4.75	43/68	GPS: Dambar, Qula.	V: Salehullah Term: V: Bakhtiar Term:
40. Ikramullah S/O Ghulam Rasool R/O Gudar.	2.3.71	44/68	GPS: Rokhna.	V: Ubidur- Rahman Term:
41. Khan Muhammad S/O Umat Shah R/O Tikni (B)	1.5.74	45/68	GPS: Ashar Manai	V: Rahatulla: Term:
42. Tajud Dip S/O Muhabat Khan R/O Gugyal.	15.10.72	46/68	GPS: Chwa.	V: Faqir- Muhammad Te:
43. Muqadar Khan S/O Ayaz Khan R/O Stanadar.	3/1.73	47/68	GPS: Lantoor. (DIR)	V: Jehan- Dastagir Te:
44. Niaz Khan S/O Sadbar Khan Lajbok.	11.5.70	48/65	GPS: Dab Baghi- Harani.	V: Rohul Ami: Term:
45. Saffur Rahman S/O Abdur Rahman R/O Narai Shah.	10.1.76	49/65	GPS: Patrak	P: All: Acc:
46. Sarbiland Khan S/O Fozli Rahman Mirgan.	27.4.74	57/65	GPS: Babgan.	

Count on page...3...

Name	Date	Age	Address	Remarks
1. Iqbalullah S/O Shamsul Haq R/O Dehri (T)	15.8.70	55/64	" Nasafa.	V: Muhammad... Terminated
2. Farid Rahman S/O Paikhtawan R/O Stanadar.	2.7.72	36/64	" Nasafa.	V: Muhammad... Terminated
3. Dahirud Din S/O Abdul Dahir R/O Stanadar.	1.6.77	57/64	" Safar Marat	V: Dahir Shah... Terminated
4. Sabz Ali S/O Said Faqir R/O Ajoo	18.77	58/64	" Jahan Pir	V: Shahnazada... Terminated
5. Abdul Qadeem S/O Faraz Khan R/O	5.4.76	59/63	" Tikar Kot	V: Muhammad... Terminated
6. Yusuf S/O Muhammad Yusuf R/O Tiodag.	11.5.77	60/63	" Shenai.	V: Muhammad... Terminated
7. Ihsanul Haq S/O Dunir Gul R/O Qasho Dal.	12.12.75	61/63	" Ali Banda	V: Munia Khan... Terminated
8. Muhammad Gul S/O Mian Gul R/O Kunda.	1.12.75	62/63	" Qandari.	V: Siraj Muhammad... Terminated
9. Sher Ali S/O Rahimullah R/O Rani.	9.8.74	63/62	" Jan Pasa S: Bagh:	V: Rahim Shah... Terminated
10. Saeenullah S/O Gul Baz Khan R/O Mani Banr.	2.2.73	65/62	" Banda MKD	V: Muntaz... Terminated
11. Saktawar Khan S/O Ghulam Muhammad R/O Stanadar.	15.3.75	66/62	" Kidar Kot	V: Muhammad... Terminated
12. Saeedur Rahman S/O Habibur Rahman R/O Khungi.	15.5.77	67/62	" Darak.	V: Abdul Haq... Terminated
13. Tiftahar Ahmad S/O Anwar Naseem R/O Shikawali.	1.2.77	68/62	" Gandirai.	V: Kamal Khan... Terminated
14. Muhammad Riaz S/O Amir Nawaz R/O Tirargara.	20.2.76	70/62	" Jabai.	V: Kamal Khan... Terminated
15. Muhammad Shah Rasool S/O Bahdar R/O Arakh (Sarai Bala)	14.5.66	71/62	" Dewlad	V: Kamal Khan... Terminated
16. Sher Hayat S/O Sher Zamin R/O Shamsikhana.	12.1.77	73/62	" Samana	V: Muhammad Javid... Terminated
17. Naqib Shah S/O Muhammad Khan R/O Khungi.	15.2.77	74/62	" Tal No.	V: Ghulam... Terminated
18. Ihsanul Haq S/O Fazli Mabood R/O Doryal.	28.1.74	76/62	" Bagh(K)	V: Muhammad... Terminated
19. Muhammad Taib S/O Hamidullah R/O Kotkai.	13.6.63	77/62	" Nimaz Kote	V: Saleh Muhammad... Terminated
20. Fazal Azim S/O Qazi Shahzada R/O Kamo.	15.6.73	78/62	" Kalpani.	V: Salim... Terminated
21. Far Shah Ali Khan S/O Hakim Khan R/O Barawal.	2.5.75	79/62	" Tikar Kot	V: Aziz... Terminated
22. Iqbalullah S/O Muhammad Afzal R/O Lalqila.	24.3.72	80/61	" Nimaz Kot	V: Muhammad... Terminated
23. Azizullah Khan S/O Mian Khan R/O Shiringal.	2.1.77	81/61	" Gat Kot	V: Mahomed... Terminated
24. Noor Aslam S/O Muhammad Raziq R/O Dog.	10.4.77	82/61	" Dambar Koon	V: Ghulam... Terminated
25. Ashtaq Ahmad S/O Said Ahmad R/O Shendi Makhal.	10.5.77	83/61	" Islam Gat.	V: Ghulam... Terminated
26. Iqbalullah S/O Noor Hamid Jan R/O Berikay.	20.4.74	84/61	" Nikhan Banda	V: Niaz Muhammad... Terminated

Muhammad S/O Habibullah	11.9.74	85/61	GPS: Ashar Kot V: Zahid Khan	Term: NA Sidiq & Suhel
Ud Din S/O Muhammad Kamil	1.1.77	86/61	" Nikhan Banda V: Samiullah	Term: do
Umar Zamin Khan S/O Saeed Mukhtiar	26.7.75	87/61	" Batora V: Hiyyatullah	Term: do
Umar R/O Shashi Kot	15.2.73	88/61	" Bandai Shah V: Rahatullah	Term: do
Muhammad S/O Biradar R/O Akor	28.3.78	89/61	" Gal Kor. No. 2 V: Ali Rahman	Term: do
Hussain Rafiq S/O Khan Zaman	1.10.77	90/61	" Moha. V: Sher Hussain	Term: do
Ishak Ali S/O Biland Khan	12.3.78	91/61	" Nagril. V: Muhammad Jamal	Term: do
Ali S/O Malang R/O Sandol	1.1.74	92/61	" Dolar. V: Hissarul Haq	Term: do
Hissarullah S/O Nawroz Khan	6.1.74	93/61	" Baten. V: Ameenullah Khan	Term: do
Muhammad Rahim S/O Muhammad Ghani	14.6.72	94/61	" Dargai. V: Sherin Becha	Term: do
Rahman S/O Wali Rahman	15.1.78	95/61	" Lalqila No. 2 V: Ekram Wahid	Term: do
Muhammad S/O Gul Faraz Khan	1.1.75	96/61	" Rokhan. V: Hadrat Shuib	Term: do
Ali Chah S/O Sultan Zamin	7.5.76	97/61	HPS: Kigooa (K) V: Shaukat Hayat	Term: do
Muhammad S/O Faiz Muhammad	12.2.77	98/61	" Bada. V: Muhammad Tahir	Term: do
Khan S/O Qadar Khan	8.3.73	99/61	GPSSarai Warai V: Rahatullah	Term: do
Hayat S/O Firoz Khan	12.4.75	100/61	GPB: Him Banda V: Muhammad Adress	Term: do
Muhammad Khan S/O Gul Baz Khan			" Lalqila No. 2 V: Rashid Khan	Term: do
Rahman S/O Faqir Muhammad	12.5.76	102/60	" Arif. V: Najim Khan	Term: do
Haz S/O Gul Roz Khan	30.3.73	103/60	" Shaga. V: Shkirullah	Term: do
Mustaf S/O Muhammad Din	2.3.76	104/60	" Sor Paw. V: Anwar Badshah	Term: do
Salim S/O Niaz Muhammad	6.11.70	105/60	" Dalgram (P) V: Sher Bahdar	Term: do
S/C Zahir Shah	5.8.76	106/60	" MPS: Kolal Dehri V: Samiullah	Term: do
Sher Muhammad	1.1.77	108/60	NPS: Warsak Sh. V: Rahmanullah	Term: do
Ghani Rahman	7.3.69	109/60	GPS: Kamlai V: Fazal Akbar	Term: do
Faqir Muhammad	1.11.76	110/60	" Samai V: Amir Nawab	Term: do
Bahdar R/O Gurjai	4.1.72	111/60	" Makamai V: Jehan Badshah	Term: do

10.

1. Khalid Muhammad S/O Fazal Rahman 5.7.76 112/60 GPS:Shingra R/O Banda. V:Sultan Alam Term: - do -

2. Ashtikhar Alam S/O Muhammad Shuit 1.8.77 113/60 " Binr (B) R/O Yar Khan Banda. V:Muushtaq Ahmad Term: - do -

3. Muhammad S/O Muhammad Naeem Khan 11.5.75 114/60 " xx Patoor. R/O Pangai Shah. V:Abdul Wahab. Term: - do -

4. Mansur Ali S/O Mian Dad Noor 7.5.72 115/60 " Dapoor (M) R/O Malukand. V:Said Mula Khat Term: - do -

5. Sher Ali S/O Abdul Karim 8.10/74 116/60 " Prang Dara Banda(T) R/O. V:Haq Nawaz Khan Term: - do -

6. Muhammad Rashid S/O Bahdar Said 11.4.75 118/60 " Makhal No.2 R/O Dehri(T) V:Rohul Manan Term: - do -

7. Mahmood Rafiq S/O Khan Muhammad 16.7.76 119/60 MPS:Binr Barai R/O Sher Kheni. V:Khalid Hussain Term: - do -

8. Mahmood Shah S/O Gul Nair Khan 1.4.71 121/60 " Shabikai. R/O Warai. V:Fazli Mabood Term: - do -

9. Sagar S/O Sargand Khan 15.1.76 122/60 GPS:Dehri, Kadi Khel. R/O Warai. V:Amir Zaman Term: - do -

10. Amir Nawab S/O Said Nawab 4/5/73 123/60 " Miahwano Band. R/O Warai. V:Azizur Rahman Term: - do -

11. Shah Zairar Khan S/O Muhammad Saeed 1.1.75 124/60 " Kohan. R/O Abid Khan. V:Ihsanullah Term: - do -

12. Arshadullah S/O Nek Muhammad 3.2.72 125/60 " Pashtan. R/O Jabar. V:Fizud Din Term: - do -

13. Mansoor Rahman S/O Khirur Rahman 7.5.75 126/60 " Dislawar. R/O Cuglar. V:Haynodin Term: - do -

14. Mian Hakim S/O Mian Haroon 1.3.77 127/60 " Sondrai Wari R/O Mula Gujar. V:Badshah Sherin Term: - do -

15. Far Rahman S/O Redi Gul 8/8.72 128/60 " Atigasar R/O Tarpatar. V:Rahatullah Term: - do -

16. Noor Rahman S/O Fazal Rahman 5.4.75 129/60 " Bagh Banda. R/O Bishgram. V:Khalid Khan Term: - do -

17. Mureed Ahmad S/O Said Ahmad 1.5.73 130/60 " Dehro(M). R/O Bagh (M) V:Bakht Zada Term: - do -

18. Fazal Qadar Khan S/O Fazal Muhammad 1.3.74 131/60 " Babagam. R/O Bikanai. V:Far Zamin Khan Term: - do -

19. Muhammad Nawaz S/O Faridoon Khan 25.11.75 132/60 " Lalqila. R/O Shagai. V:Minhagul Ahac Term: - do -

20. Muhammad Zada S/O Badshah Zada 10.4.75 133/60 " Dehri Asban. R/O Musa Tangai. V:Wazir Rahman Term: - do -

21. Haroonur Rashid S/O Himatullah 1.1.75 134/60 MPS:Umarai R/O Khadagzai. V:Akhtar Zaman Term: - do -

22. Muhammad Niaz S/O 24.4.74 135/60 GPS:Por Bat R/O Khatrai. V:Dawood Khuresh. Term: - do -

23. Ali Nawab S/O Nahidullah 20.4.75 136/60 MPS:Donga R/O Pindodog. V:Ziwar Khan Term: - do -

24. Habibul Ghafoor S/O Ahmad Hussin 20.12.72 137/60 GPS:Noora. R/O Kityari. V:Hamad Malik Term: - do -

25. Akbarullah S/O Saeed Jan 5.1.62 138/60 GPS:Changal R/O Biren (B) V:Amir Zeb Khan Term: - do -

26. Muhammad S/O Ashraf 16.1.73 139/60 MPS:Kaga Wala R/O Biren (B) V:Fazal Ghani Term: - do -

126. Sher Hadi S/O Amir Wahid 4.4.74 140/60 GPS:Jan Batai2 V:Nasurillah P.  
R/O Kotigram. *Not settled*
127. Jamil Hadi S/O Ghulam Wahid 18.4.74 141/60 " Noorkhel. V:Farviz Iqbal  
R/O Kotigram. Term: - *de* -
128. Shafiqur Rahman S/O Khirur Rahman 142/60 " Jaba(P) V:Sehat Zarin  
R/O Ouch. 10.4.75 Term: - *de* -
129. Muhammad Ayz S/O Ghulam Shamsustabriz 143/59 " Tooran. V:Noor Zada  
R/O Yarkhan Banda. 1.7.74 Term: - *de* -
130. Rahman Faqir S/O Jan Faqir 1.6.74 145/58 " Roklon. V:Dawlat Khan  
R/O Timargara. Term: - *de* -
131. Abdul Haseeb S/O Ahya Gul 2.3.75 146/59 " Jaba(P) V:Hafizul Haseeb.  
R/O Bishgram. Term: - *de* -
132. Abdul Hamid S/O Ahmad Jan 18/2.76 147/59 " Shamoor Gar. V:Aliam Zeb Term:  
R/O Dir. Term: - *de* -
133. Abdul Hakim S/O Jan Khan 4.2.73 148/59 " Mackind. V:Muhammad Rashid  
R/O Kambat. Term: - *de* -
134. Bahadar Khan S/O Gul Zarin 1.4.77 149/59 " Toopan Shah V:Habib Rasool  
R/O Rahim abad. Term: - *de* -
135. Jamal Abdul Nazzar S/O Amanul Muhi 150/59 HPS:Romeal Kass V:Muhammad Salim  
R/O Shakawalai. 18.9.76 Term: - *de* -
136. Rubikul Haq S/O Hakimul Haq 10.3.73 151/59 HPS:Pindal Kor V:Nasirul Haq  
R/O Rahim Kot. Term: - *de* -
137. Amakullah S/O Sher Bahar 6.3.73 152/59 GPS:Dabson(M) V:Khurshid Ali  
R/O Shamsikhana. (F:M:Koorona) Term: - *de* -
138. Saeed Zaman S/O Gul Zaman 15.2.72 153/59 " Nakamai. V:Sahib Zada Term:  
R/O Talash. Term: - *de* -
139. Mushtaq Ahmad S/O Noor Zaman 13.12.76 154/58 " Mamool Kass V:Fazal Chafiq  
R/O Nagrai(B) Term: - *de* -
140. Muhammad Salim S/O Roshan Zamin 155/58 " Pari Kass V:Zahoor Iqbal  
R/O Tangai. 4.3.74 Term: - *de* -
141. Umer Hassan S/O Ajab Khan 3.2.72 156/58 " Abdullah Banda V:Muhammad Navir  
R/O Timargara. Term: - *de* -
142. Anisur Rahman S/O Gul Rahman 15.3.76 157/58 M:Koto V:Ikrasullah Term:  
R/O Ziarat(T) Term: - *de* -
143. Anwar Hussain S/O 2.4.74 GPS:Batroor. V:Said Badshah  
R/O Amlook Dara. Term: - *de* -
144. Muhammad Zahid S/O Sher Ghani Khan " Shingara. V:Muhammad Ismail.  
R/O Dehri(T) 5.6.75 159/58 Term: - *de* -
145. Sahib Zada S/O Sher Zada 10.12.75 160/58 NPS:Gul Abad V:Sultan Baksh  
R/O Landai Shah. Term: - *de* -
146. Muhammad Razaq S/O Muhammad Halim 161/58 " Gumbati Jilar V:Dakht Sher  
R/O Nagrai(P) 13.10.74 Term: - *de* -
147. Shah Nawaz Khan S/O Raza Khan 1.1.73 161/58 " Serai Shi V:Badshah Zeb Khan  
R/O Yousef Manai. Term: - *de* -
148. Fazal Babu S/O Fizur Rahman 1.6.77 162/58 " Tookrai. V:Ikrasullah  
R/O Toor Hang. Term: - *de* -
149. Tajbar Khan S/O Muzafar Khan R/O 163/58 " Bar Patai. V:Gul Nawaz Term:  
Gugyal. 2.5.78 Term: - *de* -
150. Rahim Shah S/O Sher Babdar 8.4.68 164/58 B:Kotkai V:Ali Akbar Badshah  
R/O Dag Sam. Term: - *de* -
151. Rafiullah S/O Ashmali Khan 1.10.73 165/58 GPS:Kamar Tall V:Nasibullah  
R/O Degon. Term: - *de* -
152. Ghulam Habib S/O Muhammad Hazrat 166/58 " Gudisawang. V:Shah Zamin Term:  
R/O Brangola. 22.2.66 Term: - *de* -
153. Bahadar Zeb S/O Gul Zamin Khan 167/58 " Shawa No.2 V:Usman Ali Term:  
Makhai. 20.3.73 Term: - *de* -

- 1. Muhammad Awis Khan S/O Muhammad Gul 168/58 GFS:Aman Khawar Vi: Sher Zamin  
R/O Kotigram. 25.9.72 Term: *Not Selected or mail*
- 155. M. Hayat Muhammad S/O Badshah Muhammad 169/58 " Pingaes Vi: Shafiqur Rah  
R/O Chat Pat. 10.5.74 Term: - *do*
- 156. Muhammad Hayat S/O Fazal Ghafar 170/58 MPS: Ouch Kal. Vi: Ikram Term:  
R/O Ouchi 1.12.74 - *do*
- 157. Ikramullah S/O Ghulam Yousaf 171/58 " Gundish. Vi: Ghufuranull  
R/O Shaw Dir. 24.4.74 Term: - *do*
- 158. Jamalud Din S/O Fazal Raziq 172/58 GFS: Banda Gumbat Vi: Said Jan R.  
R/O Bishgram. 1.8.75 Term: *do*
- 159. Badshah Zada S/O Nawshad 173/57 MPS: Kabalo. Vi: Muhammad  
R/O Sondal. 5.12.75 Term: *do* Hussain Term:
- 160. Noor Muhammad S/O Ghazi Khan 174/57 " Haji Abad. Vi: Bakht Sahar  
R/O Amlook Dara. 2.10.72 Doon Beral Zeb: Term:  
Vi: Asmat Khan
- 161. Latifullah S/O Noorul Haq 175/57 GFS: Pashrak. Term: - *do*  
R/O Pito Dara. 20.12.77 Vi: Shah Room
- 162. Atiqur Rahman S/O Muqarab Khan 176/57 " Dab Jang Term: *do*  
R/O Kasso. 20.1.74 Vi: Shah Room
- 163. Nisar Khan S/O Muhammad Wasil 177/57 " Dogal Tempt: *do*  
R/O Rani. 2.7.74 Vi: Abdul Jalil
- 164. Bahdar Zeb S/O Sher Zada 178/52 " Khushmuqam Term: - *do*  
Bandagai. 1.1.73 Vi: Al: Acco:
- 165. Muhammad Qayoum S/O Gul Zaman Khan 181/57 " Manzai-Nehaq Vi: Sardar Ghani  
R/O Zafar Abad. 12.4.77 Term: *Not Selected or mail*
- 166. Rafiullah S/O Fasihullah 182/57 " Don (P) Vi: Ihsan Shah  
R/O Nara Shah. 27/1/62 Term: - *do*
- 167. Ghulam Ali S/O Fatch Rahman 183/57 " Deedan Pura. Vi: Fazli Rahim  
R/O Kumbhar. 25.3.72 Term: - *do*
- 168. Fizullah S/O Hamid Din 184/57 " Doobardo. Vi: Wazir Zada  
R/O Zindara. 2.3.73 Term: - *do*
- 169. Akhtar Gul S/O Redi Gul 185/57 " Tal No. 3 Vi: Niaz Ali  
Galgot. 1.1.75 Term: *do*
- 170. Muhammad Wazir S/O Fazal Rahman 186/55 " Pisto Banda. Vi: Sultan Alam  
R/O Haji Abad. 6.4.72 Term: - *do*
- 171. Muhammad Ayyaz S/O Muhammad Sherin 187/56 " Barikot Vi: Sahib Zada  
R/O Nehankot. 17.9.68 Term: - *do*
- 172. Sher Bahdar Khan S/O Hadi Ahmad 188/56 " Atanr (P) Vi: Sherin Zada  
Salan. 22.7.72 Term: *do*
- 173. Muhammad Badroz Zaman S/O 24/10/70 189/56 " Don (P) No. 2 Vi: Al: Acco:  
Mahood. R/O: Aohar (P)
- 174. Muhammad Ishaq S/O Muhammad I. Rahim 190/56 " Hasham. Vi: Aminul Haq  
R/O Jabaf. 10.2.72 Term: *Not Selected or mail*
- 175. Qayoumul Haq S/O Sakhi Jan 3.1.77 191/56 " Gawar Desh Vi: Bakhtshahzad  
R/O Sadbar Kali. Term: - *do*
- 176. Shah Wazir Khan S/O Gul Pacha 192/56 " Mandal. Vi: Dawlat Kha:  
R/O Munda. 1.4.73 Term: - *do*
- 177. Sardar Ali Shah S/O Mian Badshah 193/56 " Sadbar Kalai. P: Al: Acco:  
R/O Landakor. 19.4.71 Vi: Farid Khan
- 178. Rafiqul Islam S/O Sifal Malook 194/56 " Samar Bagh Term: *do*  
R/O Sorino. 28.3.73 Vi: Atiqur Rahman
- 179. Sar Zamin Khan S/O Bakht Zamin Khan 195/56 " Rashakai. Term: *do*  
R/O Garla. 1.3.74

TERMS & CONDITIONS.

1. They will be Governed by the such rules & regulations as may be prescribed by the Govt: from time to time for the category of the Govt: servant which they belong.
2. Their services will be liable to termination on one months' notice from either side. In case of resignation without notice one Month's pay will be forfeited in lieu thereof.
3. They should join the posts within one month of the issue of this notification. Their inter-se seniority will be determined in accordance with the merit of the Departmental selection Committee.
4. Charge report should be submitted to all concerned.
5. They shall be on probation period of two years and will have to pass departmental Examination. In case a candidate fails to qualify the departmental Exam: he will be give one more chance. If he fails again, then his services will be terminated on arrival/availability of a trained teacher, the services of untrained teacher occupied the post will be terminated.
6. Their original certificates etc will be checked and verified from the concerned institution/DISE/ROE and Islamic Madrasa before handing over the charge.
7. S/Books of the teachers must be prepared complete in all respect before handing over charge.
8. The declaration of assets should be obtained from them and immediately placed on record.
9. They are required to produce Health & Age certificates from Medical authorities concern d.
10. Charge report should not be given to the over age candidate His case for a e relaxation be sent to the concerned quarter.
11. Efforts for transfer before the completion the tenure will be dis-qualify him from the service.
12. No TA/DA is allowed
13. An undertaking shall be given by Master and Degree holders PTC/CTE etc. they shall serve the Department for atleast 5 years unless he/she/they are selected by the Public Service Commission for any post.
14. In case a person appointed as untrained teacher he will have to pass the requisite training examination within 4 years failing which his services will be terminated.

Note:-

Complete information of each category separately in consolidated list on the prescribed proforma (attached) be submitted by the lower offices. the Director of Education Primary, DES (M&F) Primary within a week positively.

Ends: 2223-2907

Dated

(USMANI GHANI),  
DISTT: EDUCATION OFFICER (M) PRIMARY  
DIR AT TEMARGARA,

16/97.

Copy forwarded to:-

1. P/S to Secretary Education Govt: of N.WFP Peshawar.
2. The Director Primary Education NWFP Peshawar.
3. The District Accounts Officer Dir at Temargara.
4. All the SMO's (M) in district.
5. The Officials concerned.

District Education Officer (M),  
Primary Dir at Temargara.

24/6

- 14 -

**Dist. Govt. KP-Provincial**  
**District Accounts Office Dtr at Timargar**  
**Monthly Salary Statement (January-2024)**



**Personal Information of Mr IKRAM ULLAH d/w/s of MUHAMMAD AFZAL**

Personnel Number: 00267978      CNIC: 1530209859295      NTN:  
 Date of Birth: 24.03.1972      Entry into Govt. Service: 25.06.1997      Length of Service: 26 Years 07 Months 008 Days

**Employment Category: Active Temporary**

Designation: PRIMARY SCHOOL HAED TEACH      80674790-DISTRICT GOVERNMENT KHYBE  
 DDO Code: DA6318-District Dir Lower  
 Payroll Section: 001      GPF Section: 001      Cash Center: 16  
 GPF A/C No: EDUDR012422      GPF Interest applied      **GPF Balance:**      240,140.00 (provisional)  
 Vendor Number: -  
**Pay and Allowances:**      Pay scale: BPS For - 2022      Pay Scale Type: Civil      BPS: 15      Pay Stage: 22

Wage type		Amount	Wage type		Amount
0001	Basic Pay	67,480.00	1001	House Rent Allowance 45%	3,524.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1505	Charge Allowance	40.00	1923	UAA-OTHER 20%(1-15)	1,000.00
2148	15% Adhoc Relief All-2013	827.00	2199	Adhoc Relief Allow @10%	555.00
2316	Teaching Allowance 2021	3,224.00	2341	Dispr. Red All 15% 2022KP	6,408.00
2347	Adhoc Rel Al 15% 22(PS17)	6,408.00	2378	Adhoc Relief All 2023 35%	22,925.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3015	GPF Subscription	-4,290.00	3501	Benevolent Fund	-1,200.00
3609	Income Tax	-2,508.00	3990	Emp.Edu. Fund KPK	-135.00
4004	R. Benefits & Death Comp:	-600.00			0.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	540,000.00	-18,000.00	522,000.00

**Deductions - Income Tax**

Payable: 38,882.88      Recovered till JAN-2024: 16,626.00      Exempted: 9720.08      Recoverable: 12,536.80

**Gross Pay (Rs.): 116,747.00      Deductions: (Rs.): -26,733.00      Net Pay: (Rs.): 90,014.00**

Payee Name: IKRAM ULLAH  
 Account Number: C/A 5441-3  
 Bank Details: NATIONAL BANK OF PAKISTAN, 230841 NBP TIMARGARA DIR NBP TIMARGARA DIR, KOHAT

Leaves:      Opening Balance:      Aailed:      Earned:      Balance:

Permanent Address: VILL LAL QILLA

City: DIR LOWER

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: ikramullah2u@gmail.com



DEPUTY SECRETARY (POLICE)  
(W/ADMINISTRATIVE)  
M. S. Khan

ATTESTED



- The caretaker, Administration Department, arrange 20 gazette copies.
- The Section Officer (Admin), Administration Department with the request to
6. The Deputy Director (IT), E&A Department.
  7. The Registrar, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
  8. The Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
  9. All Deputy Commissioners in Khyber Pakhtunkhwa.
  10. All Autonomous/Semi Autonomous Bodies in Khyber Pakhtunkhwa.
  11. All Heads of Attached Departments in Khyber Pakhtunkhwa.
  12. The Principal Secretaries to Government, Khyber Pakhtunkhwa.
  13. The Senior Member Board of Revenue, Khyber Pakhtunkhwa.
  14. The Senior Member Board of Revenue, Khyber Pakhtunkhwa.
  15. The Senior Member Board of Revenue, Khyber Pakhtunkhwa.
  16. The Senior Member Board of Revenue, Khyber Pakhtunkhwa.
  17. The Senior Member Board of Revenue, Khyber Pakhtunkhwa.
  18. The Senior Member Board of Revenue, Khyber Pakhtunkhwa.
  19. The Senior Member Board of Revenue, Khyber Pakhtunkhwa.
  20. The Senior Member Board of Revenue, Khyber Pakhtunkhwa.

CHIEF SECRETARY  
GOVERNMENT OF THE KHYBER PAKHTUNKHWA

AMENDMENT  
in rule 7, sub-rule (5) shall be deleted.

in exercise of the powers conferred by section 26 of the  
Khyber Pakhtunkhwa Civil Servants Act No. XVIII of  
1973 (Khyber Pakhtunkhwa) is pleased to direct that in the Khyber  
Pakhtunkhwa (Civil Servants) (Appointment, Promotion and Transfer) Rules, 1989, the  
following further amendment shall be made, namely:

Dated Peshawar, the 08/08/2021

NOTIFICATION

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(REGULATION-WING)



Annexure - B-

-16-

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(REGULATION WING)

NOTIFICATION

Dated Peshawar the, 06/08/2020

In exercise of the powers conferred by section 26 of the Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No XVIII) the chief Minister of Khyber Pakhtunkhwa is pleased to direct that in the Khyber Pakhtunkhwa Civil Servants (Appointment Promotion and Transfer) Rules 1989, the following further amendment shall be made, namely:

AMENDMENT

In rule 7, sub-ruler (5) shall be deleted.

CHIEF SECRETARY  
GOVERNMENT OF THE KHYBER PAKHTUNKHWA

(ANDS): & EVEN DATE

Copy is forwarded to :-

1. Additional Chief Secretary, Govt of Khyber Pakhtunkhwa. Planning & Development Department)
2. The Senior Member Board of Revenue, Khyber Pakhtunkhwa.
3. All Administrative Secretaries to Govt of Khyber Pakhtunkhwa.
4. The Principal Secretary to Governor, Khyber Pakhtunkhwa.
5. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
6. All Divisional Commissioners in Khyber Pakhtunkhwa.
7. All Heads of Attached Departments in Khyber Pakhtunkhwa.
8. All Autonomous/Semi Autonomous Bodies in Khyber Pakhtunkhwa.
9. All Deputy Commissioners in Khyber Pakhtunkhwa.
10. The Registrar, Peshawar High Court, Peshawar.
11. The Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar
12. The Secretary, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
13. The Deputy Director (IT), E&A Department.
14. All Section Officers in Establishment & Administration, Department.
15. The Section Officer (Admin), Administration Department with the request to arrange 20 gazette copies.
16. The Caretaker, Administration Department.

(WARDAH LATIF)  
DEPUTY SECRETARY (POLICY)



Annexure - C



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
No. SO(Polcy)/E&AD/1-3/2020  
Dated Peshawar the June 06, 2023

625

To: The Government of Khyber Pakhtunkhwa,  
Elementary & Secondary Education Department.

Subject: GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE  
KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT,  
PROMOTION AND TRANSFER) RULES, 1989.

Dear Sir,  
I am directed to refer to your letter No. SO(Polcy-M)M&SUD/2-2/Appointment/2023 dated 18.04.2023 on the subject noted above and to state that Sub-Rule (5) of Rule-7 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 stands deleted vide this department notification dated 06.08.2020; thus, no provision exists to decline or forgo promotion.

2. The basic rationale behind the deletion of the said rule is aimed at preventing a civil servant from temptation for illicit gain by sticking to a single lucrative post/position or to prevent those who tend to forgo promotion to evade posting/transfer or show lack of capacity to tackle higher responsibilities in case of promotion. Therefore, it is obligatory upon every civil servant to accept promotion in every condition.

3. Furthermore, those officers/officials who do not comply with promotion order of the competent authority or try to evade promotion through different means shall be proceeded against under Khyber Pakhtunkhwa Civil Servants (Efficiency & Discipline) Rules, 2011, please.

Yours faithfully,

(Issa Muhammad Khan)  
Section Officer (Policy)

ASE  
7/6

Encls. Of even No. & date

Copy forwarded to the:-

1. PS to Special Secretary (Reg), Establishment Department.
2. PS to Additional Secretary (Reg-II), Establishment Department.
3. PS to Deputy Secretary (Policy), Establishment Department.

SE/...

2023  
2.1.6

Section Officer (Policy)

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(REGULATION WING)

To

The Government of Khyber Pakhtunkhwa  
Elementary & Secondary Education Department.

Subject: GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION AND TRANSFER) RULES 1989

Dear Sir,

I am directed to refer to your letter No SO(Primary.M/E&SED/2 – 2/Appointment/2023) dated 18.01.2023 on the subject noted above and to state that sub-Rule(5) of Rule-7 of Khyber Pakhtunkhwa Civil Servants(Appointment, Promotion and Transfer) Rules, 1989 stands deleted vide this department notification dated 06-08-2020; thus, no provision exists to decline or forgo promotion.

2. The basic rationale behind the deletion of the ibid rule is aimed to preventing a civil servant from temptation for illicit gain by sticking to a single lucrative post/position or to prevent those who tend to forgo promotion to evade posting/transfer or show lack of capacity to tackle higher responsibilities in case of promotion. Therefore, it is obligatory upon every civil servant to accept promotion in every condition.

3. Further those officers/officials who do not comply with promotion order of the competent authority or try to evade promotion through different means shall be proceeded, against under Khyber Pakhtunkhwa Civil servants (Efficiency & Discipline) Rules, 2011, please

Yours faithfully,  
(Issa Muhammad Khan)  
Section Officer(Policy)

(Encl). of even No & date

Copy is forwarded to :-

1. PS to Special Secretary (Reg), Establishment Department.
2. PA to Additional Secretary (Reg-II), Establishment
1. PS to Deputy Secretary(Policy), Establishment Department.

Section Officer  
(POLICY)





GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
CIVIL SECRETARIAT PESHAWAR  
(Phone No.001-9223587)

No. SO (Primary-M/E&SED/2-6/2023  
Dated Peshawar (Kc. June 26<sup>th</sup>, 2023

To

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

Aziz Ullah Khan  
President  
All Primary Teacher's Association, KP

*[Handwritten Signature]*  
26/6/23

Subject: GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE KHYBER  
PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION  
AND TRANSFER) RULES, 1988.

I am directed to refer to the subject noted above and to enclose here with  
a letter of Establishment Department letter No. SO (Policy)E&AD/1-3/2020 dated  
06 June, 2023 and to state that the subject meeting is to be held on 05 July, 2023 at  
11:00 AM in this department under the Chairmanship of Additional Secretary (Estab)  
E&SE Department in his office.

2. You are, therefore, requested to depute a representative of your  
respective Department to attend the meeting on a date, time & venue as mentioned  
above, please.

Encl: AA

*[Handwritten Signature]*

*[Handwritten Signature]*  
(MUHAMMAD ISHAQ)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

1. PS to Secretary, E&SE Department Khyber Pakhtunkhwa.

*[Handwritten Signature]*

*[Handwritten Signature]*  
SECTION OFFICER (PRIMARY MALE)  
26/6/23

*[Handwritten Signature]*

B/c - 20 -

No SO (Primary-M)/E&SED/2-6/2023  
Dated Peshawar the June 25<sup>th</sup> 2023

To

The Director  
Elementary & Secondary Education Department  
Khyber Pakhtunkhwa, Peshawar

Aziz Ullah Khan President  
President  
All Primary Teacher's Association, KP

Subject: GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE KHYBER  
PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION  
AND TRANSFER) RULES, 1989.

I am directed to refer to the subject noted above and to enclose here with a letter of Establishment Department letter No. SO (Policy)E&AD/1-3/2020 dated 06 June, 2023 and to state that the subject meeting is to be held on 06 July, 2023 at 11:00 AM in this department under the Chairmanship of Additional Secretary (Estab) E&SE Department in his office.

2. You are, therefore, requested to depute a representative of your respective Department to attend the meeting on a date, time & venue as mentioned above, please.

Encl: AA

(MUHAMMAD ISHAQ)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

1. PS to Secretary, E&SE Department Khyber Pakhtunkhwa.

SECTION OFFICER (PRIMARY MALE)



- 21 -

MINUTES OF THE MEETING REGARDING APPLICATION SUBMITTED BY MR. AZIZ ULLAH PROVINCIAL PRESIDENT ALL PRIMARY TEACHERS ASSOCIATION KHYBER PAKHTUNKHWA REGARDING DELETION OF RULE 7(5) IN THE CIVIL SERVANT (APPOINTMENT, PROMOTION & TRANSFER RULES 1989).

A meeting regarding the subject matter was held on 06-07-2023 at 11:00 AM under the Chairmanship of Additional Secretary Establishment in his office. The following attended the meeting.


Annexure  
①

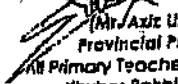
Sl#	NAME	DESIGNATION
1	Mr. Fazal Wahid	Deputy Director Establishment of Directorate Elementary & Secondary Education Department
2	Mr. Aziz Ullah	Provincial President All Primary Teachers Association Khyber Pakhtunkhwa
3	Mr. Razaqat Ullah	General Secretary APTA Peshawar
4	Muhammad Ishaq	Section Officer (Primary) E&SE Department Civil Secretariat Khyber Pakhtunkhwa Peshawar

2. The meeting started with recitation from The Holy Quran. The chair welcomed the participants. The Deputy Director (Establishment) of Directorate of Elementary & Secondary Education briefed the forum regarding agenda item in detail.

3. After thorough discussion it was decided that Directorate of Elementary & Secondary Education Department may examine the case properly and submit a self-contained/consolidated case for onward submission to Establishment Department for further necessary action.

The meeting ended with a vote of thanks from the Chair.

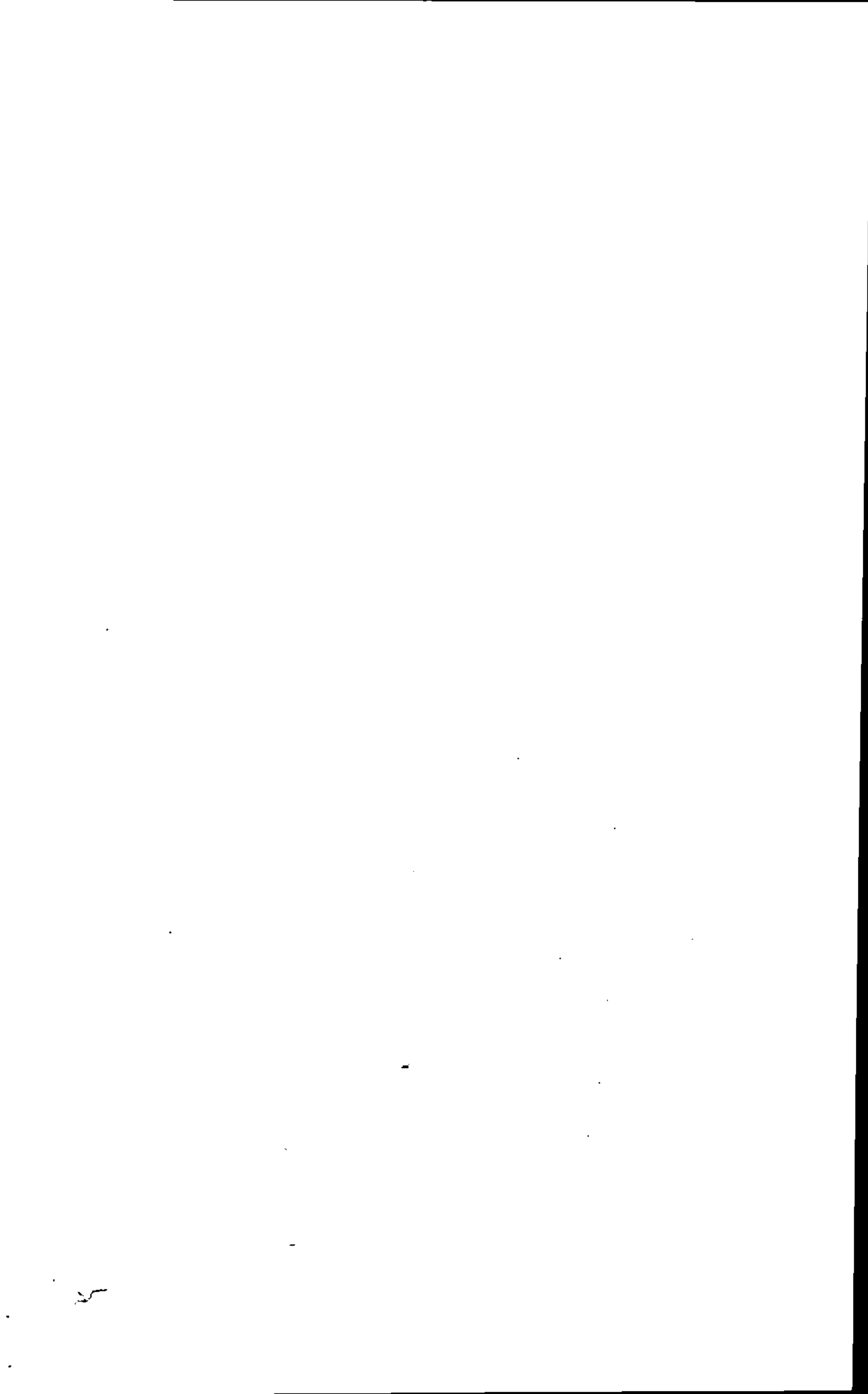
  
(Mr. Fazal Wahid)  
Deputy Director  
E&SE Department

  
(Mr. Aziz Ullah)  
Provincial President  
All Primary Teachers Association  
Khyber Pakhtunkhwa

  
(Mr. Razaqat Ullah)  
General Secretary APTA  
Peshawar

  
(Muhammad Ishaq)  
Section Officer (Primary-Male)  
E&SE Department

(Abdullah)  
Additional Secretary (Establishment)  
E&SE Department





-22-

-B/C-

**MINUTES OF THE MEETING REGARDING APPLICATION SUBMITTED BY MR AZIZ ULLAH PROVINCIAL PRESIDENT ALL PRIMARY TEACHERS ASSOCIATION KHYBER PAKHTUNKHWA REGARDING DELETION OF RULE 7(5) IN THE CIVIL SERVANT (APPOINTMENT, PROMOTION & TRANSFER RULES 1989).**

A meeting regarding the subject matter was held on 06-07-2023 at 11:00 AM under the Chairmanship of Additional Secretary Establishment in his office. The following attended the meeting

S#	NAME	DESIGNATION
1.	Mr. Fazal Wahid	Deputy Director Establishment of Directorate Elementary & Secondary Education Department
2.	Mr. Aziz Ullah	Provincial President All Primary Teachers Association: Khyber Pakhtunkhwa
3.	Mr. Razaqat Ullah	General Secretary APTA Peshawar
4.	Muhammad Ishaq	Section Officer (Primary) E&SE Department Civil Secretariat Khyber Pakhtunkhwa Peshawar

2. The meeting started with recitation from The Holy Quran. The chair welcomed the participants. The Deputy Director (Establishment) of Directorate of Elementary & Secondary Education briefed the forum regarding agenda item in detail.

3. After threadbare discussion it was decided that Directorate of Elementary & Secondary Education Department may examine the case properly and submit a self-contained/consolidated case for onward submission to Establishment Department for further necessary action.

The meeting ended with a vote of thanks from the Chair.

(Mr. Fazal Wahid)  
Deputy Director-1  
E&SE Department

Provincial President  
All Primary Teachers Association  
Khyber Pakhtunkhwa

(Mr. Razaqat Ullah)  
General Secretary APTA  
Peshawar

(Muhammad Ishaq)  
Section Officer (Primary-Male)  
E&SE Department

(Abdullah)

Additional Secretary (Establishment)



No. 8145

Ministry of Education and Science of the Kyrgyz Republic

Ministry of Education and Science of the Kyrgyz Republic

The Section Officer (Primary-Stage),  
Elementary & Secondary Education Department,  
Kyrgyz Republic Education

Subject: -  
MINUTES OF THE MEETING

I am directed to refer to the letter No. SO/Primary-MS/ESSED/5-11 dated 10-07-2023 on the subject cited above and to G. M. M. of the meeting P/ST/2023 dated 10-07-2023 on the subject cited above and to present brief history about the background of the case as under:

- That Government of Kyrgyz Republic Education Department (Regulation Wing) dated Rule 7(2) in the Civil Service (Appointment, Promotion & Transfer Rules 1980) vide notification No. SOX-VI (S&AD)/1-2/2020 dated 06-08-2020.
- That this office bought guidance from your good office in the following words vide letter No. 6987 dated 10-02-2023.
- (i) Now if the obligation upon the civil servant to accept promotion in every condition, (ii) If it is the obligation of the civil servant to either accept or turn down the offer of promotion.
- That your good office forwarded the same to the quarter concerned vide letter No. SO/Primary-MS/ESSED/2-2/Appointment/2023 for necessary guidance.
- That the Government of Kyrgyz Republic Education Department (Regulation Wing) vide letter No. SOX-VI (S&AD)/1-2/2020 dated 06-08-2023 categorically stated that there shall be no provision in decline or forgo promotion. It is obligatory upon every civil servant to accept promotion under every condition.
- The same was received by this office from your good office vide letter No. SO/Primary-MS/ESSED/2-2/Appointment/2023 dated 13-06-2023.
- That, in the light of the minutes of meeting dated 6-07-2023, held under the Chairmanship of Hon. Assistant Secretary Establishment at his office, has been asked for submission of consolidated case.
- In view of the above, this office is of considered opinion that the deletion of Rules 7(3) have affected negatively a huge number of Female Teachers. Thus it is proposed that Teachers below the level may be exempted of implications of the amendments in the rules bid provided they submit their written request prior to conclusion of the meeting of Departmental Promotion Committee.

The case is submitted for perusal and necessary actions please.

Assistant Director (Ex-Officio)  
Elementary & Secondary Education  
Kyrgyz Republic Education

Encl: No. \_\_\_\_\_  
Copy of the above is to:-

1. PA to Director Local Directorate.
2. Master Copy.

Assistant Director (Ex-Officio)  
Elementary & Secondary Education  
Kyrgyz Republic Education



No. SOCP/primary-M/EB/SED/2-2/Appointment-Rule /2023  
 Peshawar Dated 23<sup>rd</sup> August, 2023

Annexure E

The Secretary to Govt. of Khyber Pakhtunkhwa,  
 Establishment & Administration Department,  
 Peshawar

**SUBJECT: - GUIDANCE REGARDING PROMOTION OF RULE 7(5) IN THE CIVIL  
 SERVANT (APPOINTMENT, PROMOTION & TRANSFER RULES  
 1989).**

Dear Sir,

I am directed to refer to your letter No. SOCPolicy/ E/AD/ 1-3/2020 dated  
 06<sup>th</sup> June 2023 and to state that after deletion of rule 7(5) Khyber Pakhtunkhwa Civil  
 Servant (Appointment, Promotion & Transfer Rules 1989) it has been intimated that those  
 officers/ officials who do not comply with promotion order of the competent authority or  
 try to evade promotion through different means shall be proceed under Khyber  
 Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules, 2011.

2. In this connection it is submitted that in some cases lady teacher of primary  
 level who await such promotions have to face serious inconvenience while they have to  
 perform duties in the remotest station with no residential or transport facility. Most of  
 them are married with kids and elder father or mother-in-law who need care. In such  
 cases, there are negative effects on service delivery.

3. In view of the above, the said amendment may be reconsidered to the  
 extent of lady teacher in primary schools.

Copy forwarded to the:  
 1. Director ERSE Khyber Pakhtunkhwa,  
 PS to Secretary, ERSE Department Khyber Pakhtunkhwa,  
 SECTION OFFICER (PRIMARY MALE)  
 (MUNAWWAR ISKANDI)  
 SECTION OFFICER (PRIMARY MALE)

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WP4442-2023 AZIZULHAH VS GOVT OF PK43

-26-

-B/c-

-12-

No. 55 (Primary - M) E&SEED / 3-A /  
Appointment - Rule / 2023

Peshawar Dated 23rd August, 2023.

To

The Secretary to Government of Khyber Pakhtunkhwa,  
Establishment and Administration Department,  
Peshawar.

SUBJECT: Guidance regarding deletion of Rule 7(S) in the  
Civil Servant (Appointment, Promotion & Transfer Rules  
1989).

Dear Sir,

I am directed to refer to your letter No. 50 (Policy) / E&AD  
/ 1-3/2020 dated 3<sup>rd</sup> June 2020 and to state that after  
deletion of Rule 7(S) Khyber Pakhtunkhwa Civil Servant (Appointment,  
Promotion and Transfer Rules 1989) it has been intimated that  
those officers/officials who do not comply with promotion order  
of the competent authority or try to evade promotion through  
different means shall be proceed under Khyber Pakhtunkhwa  
Civil Servant (Efficiency and Discipline) Rule 2011.

In this connection it is submitted that in some cases lady  
teacher of primary level who avail such promotion have to  
face serious inconvenience while they have to perform duties  
in the remotest stations with no residential/transport facilities.  
Most of them are married with kids and elder father of  
Mother-in-law who need care. In such cases there are negative  
effects on service delivery.

In view of above, the said amendment may be reconsidered to  
the extent of lady teacher in primary schools.

Copy forwarded to;

1. Director E&SE Khyber Pakhtunkhwa.
2. PS to Secretary, E&SE Department of Khyber Pakhtunkhwa

(Muhammad Ishaq)  
Section Officer (Primary  
Male)

Annexure - F



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
No. SO(Policy)E&AD/1-3/2020  
Dated Peshawar the September 07, 2023

To

The Secretary to Government of Khyber Pakhtunkhwa,  
Elementary & Secondary Education Department.

Subject: - GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE  
KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT,  
PROMOTION AND TRANSFER) RULES, 1989.

Dear Sir,

I am directed to refer to your letter No. SO(Primary-M)/E&SED/2-  
2/Appointment-Rule/2023 dated 23.08.2023 on the subject noted above and to state that  
necessary guidance has already been rendered to your good office vide this department letter of  
even No. dated 06.06.2023 (copy enclosed).

Yours faithfully,

Section Officer (Policy)

Endst. Of even No & date

Copy forwarded to the:-

1. PS to Special Secretary (Reg), Establishment Department.
2. PA to Additional Secretary (Reg-II), Establishment Department.
3. PS to Deputy Secretary (Policy), Establishment Department.

WP445-2023 AZIZULLAH VS GOVT OF PK43

-28-

- B/C -

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
No. SO(Policy)E&AD/1-3/2020  
Dated Peshawar the September 07, 2023

To

The Secretary to Government of Khyber Pakhtunkhwa,  
Elementary & Secondary Education Department

Subject: - GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE  
KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT,  
PROMOTION AND TRANSFER) RULES, 1989.

Dear Sir,

I am directed to refer to your letter No. SO(Primary-M)/E&SED/2- 2/Appointment-  
Rule/2023 dated 23.08.2023 on the subject noted above and to state that necessary  
guidance has already been tendered to your good office vide this department letter of even  
No. dated 06.06.2023 (copy enclosed).

Yours faithfully,

Section Officer (Policy)

Encls: Of even No & date

Copy forwarded to the:-

1. PS to Special Secretary (Reg), Establishment Department.
2. PA to Additional Secretary (Reg-II), Establishment Department.
3. PS to Deputy Secretary (Policy), Establishment Department.

Section Officer (Policy)

-29-

Annexure - G

To,

- 1) Secretary to Government of Khyber Pakhtunkhwa, Establishment Department, Civil Secretariat, Peshawar
- 2) Secretary to Government of Khyber Pakhtunkhwa, Elementary and Secondary Education Department, Civil Secretariat, Peshawar
- 3) Director Elementary and Secondary Education Department


Subject: REPRESENTATION AGAINST THE IMPUGNED NOTIFICATION BEARING NO.SO(POLICY)E&AD/1-3/2020, DATED 06/08/2020, COMMUNICATED TO SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA, ELEMENTARY & SECONDARY EDUCATION DEPARTMENT VIDE LETTER D06/06/2023, WHEREIN IT WAS STATED THAT SUB RULE 5 OF RULE 7 OF KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION AND TRANSFER) RULES, 1989 STANDS DELETED

Sir/ Madam:-

Your Honorable authority promulgated Notification No. SO (Policy) E&AD/1-3/2020, dated 06/08/2020, communicated to Elementary & Secondary Education vide letter dated 06/06/23 wherein it has been made mandatory to the employees to avail the promotion, otherwise, disciplinary action shall be taken against the employees. That, as per notification No. SD (Policy) /EDAD/1-3/2020 dated 06/08/2020, the right of foregoing of promotion was withdrawn and the Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) deleted Rule 7(5) in the Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 vide notification no SOR-VI (E & AD)/1-2/2020 dated 06-08-2020. That the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar asked for guidance regarding deletion of Rule 7(5) in Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 in respect of which the Establishment Department vide its letter No. SO.(Policy) E&AD/1-3/2020 dated Peshawar the June 06th, 2023 directed the Directorate of Elementary & Secondary Education that Rule 7(5) in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 has been deleted vide notification dated 06-08-2020 and, therefore, no provision exists to decline or forgo promotion and it is obligatory upon every civil servant to accept promotion under every condition. That Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa also wrote a letter to the office of Establishment & Administrative Department vide No SO(Primary-M) E&SED/2-2/Appointment Rule/2023 dated 23-08-2023 to reconsider the amendment made in Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 as it had negatively affected a large number of teachers and especially female teachers. In the meanwhile, the department vide its letter dated 07th of September 2023 directed the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa that necessary guidance has already been provided to the department and therefore no provision exists to decline or forgo promotion and those teachers who do not comply with the promotion order of the competent authority or try to evade promotion through different means shall be proceeded under the Khyber Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules, 2011.

**It is, therefore, humbly prayed that on the acceptance of the instant representation; the Notification bearing No. SO (POLICY) E&AD/1-3 1-2020 DATED 06/08/2020, communicated to vide letter dated 06/06/2023, may please be declared and ordered to be struck down being Void, Ultra vires to the Constitution of Pakistan and against the fundamental principles of natural justice.**

Dated 16 /03/2024

  
IKRAM ULLAH  
S/O MUHAMMAD AFZAL  
PSHT.





*[Handwritten signature]*

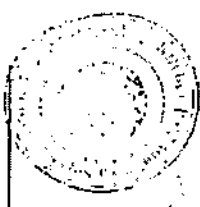
CS CamScanner

Date of Termination of Application: 10-12-14  
 Number of Copies: 5  
 Page: 18  
 Name of: 18-11-14  
 Date of Termination of Application: 10-12-14

Certified to be true copy (Muhammad Akbar Khan)  
 Member (B)

*[Handwritten mark]*

1. Learned counsel for the appellant present.  
 2. Let a pre-admission notice be issued to the respondents through TCS for submission of reply/commitments. Appellant is directed to deposit TCS expenses within three days. To come up for reply/commitments as well as preliminary hearing on 06.06.2024 before S.M. P.P given in learned counsel for the appellant.  
 03. Along with the service appeal there is an application for suspension of Notification dated 06.06.2023 and letter dated 23.08.2023 till the final disposal of main service appeal. In the meanwhile, no adverse action shall be taken against the appellant till next date of hearing.



07.05.2024

32-

# VAKALAT NAMA

## BEFORE THE SERVICE TRIBUNAL PESHAWAR

**IRAM ULLAH**

Appellant

Versus

Government of KP & others

Respondents

**I (the Appellant)**

do hereby appoint and retain

MUHAMMAD MUAZZAM BUTT ASC. MUHAMMAD ADEEL BUTT AHC

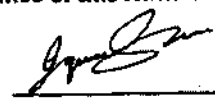
BASSAM AHMAD SIDDIQUI AHC

&

ASSOCIATES OF MUAZZAM LAW FIRM

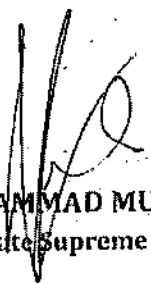
to act and appear for me in the above Suit and on my behalf to conduct and prosecute (or defend) the same and all proceedings that may be taken in respect of any petition connected with the same or any decree or order passed therein and Applications for review to file and obtain return of documents; and to represent me/us and to take all necessary steps on my/our behalf in the above matter.

I agree to ratify all acts done by the aforesaid Advocate in pursuance of this Authority.

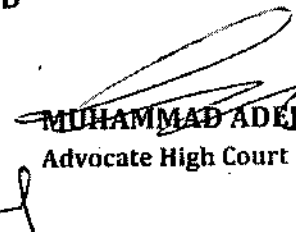


**APPELLANT**

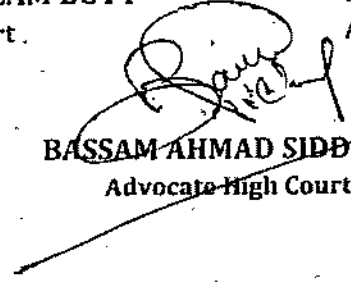
**ACCEPTED**



**MUHAMMAD MUAZZAM BUTT**  
Advocate Supreme Court.



**MUHAMMAD ADEEL BUTT**  
Advocate High Court



**BASSAM AHMAD SIDDIQUI**  
Advocate High Court