# FORM OF ORDER SHEET

Court of			
Appeal No.	1674	į.	/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1.	2	3
1-	27 /09/2 <b>02</b> 4	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 Pesh given to counsel for the appellant.
		By order of the Chairman REGISTRAR
	· · · · · · · · · · · · · · · · · · ·	

# BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA

A. No.1674/2024 RAHEEM KHAN

V/S

Government of KP & others

# INDEX

S#	DESCRIPTION OF THE DOCUMENTS	ANNEX	PAGES
1.	Appeal and Verification	*	1-4
2.	Application for suspension	*	5 .
3.	Copy of Monthly Salary account	· · A.	6-10
4,	Copy of notification No. SD (Policy) EV AD/1-	В.	11 -12
	3/2020 dated 06/08/2020		
5.	Copy of Impugned Letter dated June 06th, 2023	C.	13-16
ŧ	Copy of Minutes of Meeting dated 06-07-2023	D.	17-20
7.	Copy of Letter dated 23-08-2023	E.	21 - 22
8.	Copy of Impugned letter dated 07-09-2023	F.	23-24
9.	Copy of Representation against the said	G & H	25 - 26
	notification and representation made by APTA		27
	President		
10.	, Wakalat Nama		28//

ADDOCATE M-Muazam Butt

 $W_{1}$ 

# BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA

Īn	D	۸F	to
ın	к	eг	TΩ

Service Appeal No 1674 /2024

Raheem Khan Son of Zarwar Khan, PSHT GPS Furki Kahi, Tehsil & District Hangu

.....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:

- 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**
- 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
- 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 &

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 <u>Annexure E</u>

- 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 <u>Annexure G & H</u>
- 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:-

- 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/goldance dated 06/08/2020 06/06/2023 are liable to be set-aside.
  - 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 or 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.
- 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.
- 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

- 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.
- 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:

 $|\chi D|$ 

. :

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

Through

Deponent

Muhamind Muazzzam Butt Advocate Supreme Court

Muhammad Adeel But Advocate High Court

Appellant

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

## BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA

·	RAHIM KHAN.
Service Appeal No	/2024
In Ref to	
C.M NO	-P of 2024

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 Hangurable

Through

Muhammad Muazzzam Butt Advocate Supreme Court

Muhammad Adeel Rutt

Appellant

<u>อกร                                    </u>	te effect & further detail given below. Name		Address	Merit.	Place of	Remarks
o.	Rame			40.00	Posting  GPS Shinali Kahi.	A.V.P.
<del>-</del>	Sahib Noor	Sultan Asghar	Turki Banda	59.80	GPS No.1	A.V.P.
	Fazal Azim	Atta Mohd.	Karbogha	57.48	Karbogha.	11. 11.
	Lasat Asim			56.51	GPS Tavizi Banda	A.V.P.
	Saifullah	Awal Khan	Toghsarai .		GPS No.1	A.V.P.
	Molecujaz	Amanat Khan	Sarozai.	55.72	Sarozai.	
	i Municipal :		A A Library	55,06	Cd2: Bagaboo	A.V.U.
	Abdul Jalil	Sultan Mohd:	Mishis Banda			
	<u> </u>		Hagatou. Tamboli Banda.	54.73	GPS Tambli	A.V.P.
	Mohd;Shaheed	Eid Akbar	ranjugit (Janea:	_	Banda	
		Mir Ayaz	Khazina Banda	54.59.	GPS Khazina	A.V.P.
• •	Mohil Zahid		Saurozai	51.98	GPS No.3.	A.V.P.
	Fazal Wahid	Khinsla Gul	, 1801-77-7		Sarozai.	A.V.P.
•		Office fangs	Dan do	57.97	GPS Darshi.	Quirat
	Moird Jaman	Naik Bad Shah	Karbogha	5330	Govt:Service	GHS
	Mon	,	1		OUTEBERTIE	Torawari
. •			<u> </u>	<u> </u>	GPS Bahadar	1 A.V.P.
<u> </u>	S.Jami Hussain	S.Zainul Abadin	Pass Kaly .	53.	Gari	
				52.89	GPS Sharki	A.V.P.
	Bakhtiar Mohd:	Fiaz Mohd:	Karbogha	1 32,07	Karbogha	· · · · · · · · · · · · · · · · · · ·
•		Fazal Gul	Gandiri	52.83	GPS Khan Kot	A.V.P.
	Saifullah	Momin Klian	Dalian	52.56	GPS No 1 Dallan	A.V.P.
<del></del>	Khalil-Rehman		Toghsarai	51.81	GPS No.1	A.V.P.
	Mohd:Bilai	Mohd:Quraish	1 Ognamus		Toghsarai.	
		Ghous Din	Karbogha	51.69.	GPS Shamal Din	A.V.P.
	Noocud Din	Shainsul Haq	Karbogha	51.67	GPS Sharki	,'I,V,À
	Masiul Haq	Shansurrad	Tem mognin		Karbogha.	a A.V.P.
		Noor Akbar	Azimi Banda	51.50	GPS Azimi Band	
3. <u> </u>	Masood Akbar	Nazar Alio	Dallan	51.35	GPS No.5 Dallan	
9	Shababud Din	Shamsud Din	Sarozai.	51.31	GPS No.2	A.V.P.
O.	Shahidin	Shanado ism			Sarozai.	A.V.P.
<del></del>	The state of the s	· Abdul Hakim	Karbogha	51.05	GPS No.1	7.7.1
1	Shamsul Huda :	11000	o la constantina		GPS No. 1 Kahi.	A.V.P.
<u> </u>	Roslian A.yaz	Mira khan	Kahi	50.96	GPS No.2	A.V.P.
2	S Mohd:Irshad	Bahadar Zaman	Karbogha	50.92:	Karobgha.	1,
3.	. Spiritiff, frame			60.00	GPS Dapa Thall	A.V.P.
<del></del>	M.Nisar Khan	Ghazi Mohd:	Chapri Waziran	50.85.	GPS Darari Ban	
4:	Noor Zarin	Mir Wazir	Darari Banda	50.76	GPS No.4 Hang	
5.	Ansar Hussain	Jafar Ghulam	Ganjan Kaly	50.57	GPS Doaba.	A.V.P.
6.	Pio Hanif	Sheraz Gul	Sarozai	50.29	GPS Dapa Thal	
7.	Surat Khan	Hakim Zar	Chapri Waziran	49.83	GPS Bagatoo.	A.V.P.
8.	Miqdadullah	Zahoorullalı	Bagatoo.	49.55.	GPS Darari Bar	
9.	12 h A de de de destruit	Mohd:Kansal	- Darari Banda (**)	49.33	GPS No.3 Dalli	
	Wali Khan	Abdur Rehman	Dalian 2	49.26.	GMPS Sarak	A.V.P
31. 🖖		Mushtari	Adam khel(Kach	) 48.93	Dana	
32.	- Saifullah Khan			48.90	GPS Mata Kola	A.V.P
·	Mohd:Rahim	Mohd:Salim	Mianji Khel	48.81	GPS No.4 Dall	
33. 34.	Rulmund Din	Miraj Ud Din	Dallao		GPS Shanawar	
	Shakirullah	Khial Bat Khai	n Naryab	48.47	Narvab	
35.	Shakiruhan			48.20	GPS Sheikh W	ali A.V.I
7/ /	Abdul Samad	Abdul Majid	Mjanji Khel	40.50	Korona	
36.	Account Danish			48.14	GPS Azimi Ba	
	/ Jahanzeb	Fazal Menan	Azimi Banda -		GPS Doaba.	A.V.I
37.	Mohd:Sher	Islam Gu!	Sarozai	48	GPS Doaba.	A.V.
38	. Mohd:Hayat	Mehraban	Sarozai.	47.73	GPS Shinki	Ä.V.
39.	Mohd;Jan	Hakim Khan	Dallan	47.73	Banda	<u> </u>
40.				47.68	GPS Doaba.	<u>A.V.</u>
41	Hazrat Hussaus	Zar Mohd;	Doalia dr. Trab blief 1	47.50	GPS Lodi Kh	A V.
11	. Janakat Ali	(Jigh Sawar △	· •	4/ 19	1.4% Ho 1 Da	Harris A. V.
43	Attaur Rehman	Melinjood Kli		47.36		ngu AVI
, "" <u> </u>	Minhammad Khan	· Saifoor Khan	Mon: Samun	1	· 1 .	4 T 1

7	#		-			<u> </u>	10.700	5- 30 x 10 A T			June 1997 Control Control	-	į
		ad ShahKeel	Munauma Nabčel								1 A.V.P.		
5.			Nabcei			'		1.	7aes i	Ladhi Khel		\	
ء. مند ۽	COUNC	i WISE	····		\	God	45.89		GPS	Nu.3	$\int \widetilde{\Lambda}_{i} \nabla_{i} P_{ij}$	}. <b>\</b>	_
NON.	COUNT	3	!brahim	Khan	Lodhi K	HC1	41.5	9.	II. anh	.im721	A.V.P.	<u> </u>	
RAISAN			Mohd: A	li	Lodikh	<b>C1</b>			GPS	Shahuwam.	-\ A. \		•
46.	Saiid Al	Hussain	1		Shahu	Wam			1		- A.V.P		_
.17.	Hameet	:	sycd W	nxir	Same	•••	1		1 GP	չ Gulbugh	A.V.P		
	Anwar	Shah.	1		ارزين حد أ-،	lar Gari	14.		$\frac{1}{2}$ GP	S Bahadar	10.		
48.	TUC K	oan Bart.	Gharib	Shah	Banac	lar Gari	44	70.	1 Ga	ri	-\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	5.	
	Azmat	ullah	Namin	allah	Transa			2.83		S No 1	\ \ \		
49.	Mond	Imran	,		Khar	Bari	\ "-	2,63	110	mgn:		\	
50.			Gulza	r Mohd	1					PS Bado Tal	ib A.V	<u>!'</u>	-
1	Shahi	b						5.46.	G	PS Bado Tak	1		
-51.	1	5 (NID		- Badshii	n Dar	band				IMPS Qasim	A.V	,P.	[
	DAR	BAND	Hund	ir Badsha				46.23.	_ \ (	Abad Doaha.			
52.,	Mol	d:Khalid		1 Nachul	Sar	ozai	•\.	<u> </u>		GPS Doaba.		7.P.	1
\	DO.	VBX.	Abd	ul Mohd:	\			46,16.	1	Cha Doma	\ \.	V.P.	1
7:1		man Mohd	. \ \frac{1}{10.100}	ուս հա	1	gozui Jan	1	44.97	. \	GPS Donlin	\^.	ý V.	1
*\		fiullah		nak Bads	lian	oaba oaba		44.35				V.P.	7
54.	la	nshid Khan		min Gul		oaba		<b></b>		GPS Shana	vari A		_
55.	Si	iah Room				Sawan B	anda	47.14.		Maryinh.		CV.P.	1
\ \[ \sum_{56}.		AUVAB	$-1_{V}$	izal Mani	տ 🕂 🤻	A LIMITED AN	٠ ٨	146.54		C.P. Shana	· .		-\
ļ		labibar Kehman	· 1		}	Naryab	$\mathcal{F}_{l}$	\ .		Naryab     GPS Sawa	.n	A.V.P.	1
57				anai Khai	. 1	Sawan	Banka	1 43.73	3	al a.s.	_1_	A.V.P.	
55	8.	Mond: haf	<u></u>	Ahmad Sl	nah			12.0	<u></u>	GPS No.		A.V.P.	
-\_		Amir Mond:				Sawan	Banda	$-\frac{142.0}{41.9}$		GPS Mar	oli		
. \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	59			Fazal Re	nman	Marol	Banda	141.9	, 0	Banda		A.V.P.	\
·  -		Kasib Rehman		Mutabar	Khan	1	197	<del> 37.</del>	19.	GPS No Sarazan	ka		
	60.	Hassan Akbar				Maro	fi Banda	1		CDS NO	.   Zargui	A.V.P	<u></u>
. \	01.			Meva'C	u, 	<u> </u>	in Banda	33.	.56.		ינמונו ואסי <del>י</del>	A.V.P	<del>;</del>
- <del> -</del> -	62.	Mohd:Jasim		Fazal R	ehman	Sawa	ofi banda		.20.	GPS N	o.2 Chapri	A.V.I	
2 · 1		Azizur Rehman	n .	Hibib I	Rehman	Marc	pri Naryab	29	0.07	Naryal			
	63.	Atique Rehman	n	Qadir	Khan	Cha	Pri 1444-2					+ A.V.	P.
• 1	64	Gul Nawaz	-					<del>-</del>	5.56	GPS N	Aehboob	\	
	65	l				Gai	ndiri	1.4	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Banda	Adam Band	a A.V	<u>.P.</u>
		DALLAN		Jahaji	ir Khan	1		/	15.68.	GPS	Adam Paul	a A.V	P
		Uman Khan		1		Ga	mdiri		45.33	GPS	Adam Band		
	66.	Wali Man Si	1111		Shini Survice	M	imiji Ehel	1			Mughal	\ A.\	/.P.
	67.	Akhtan Gul		Gui	Nu Zir				44.88	i	.1	: <sub>م</sub> ر-	V.P
	68.	TOGHSAR	Al		Din Shuh	·\ T	urki Banda	·			<ul> <li>A Robita IVI</li> </ul>	C.~ L	V.P
	100	Agai Badsh	iah				Alwara Me	lii	18 6	\ co	S Tavizi 131		<u>V</u> p
•	69	1			nin Cial		Asglano Ba	anda	36.6	100	s Kalgarn		.V.I.
		lu Unden Qui		\ e_i	door Bad!		Kalgarh -		33.7	2\*ai	is No.1 Ta	1	_
	70	Badsi	1311	NA	ohd:Kamu	3 ·	Turki Ran	da	32.				V.V.P.
	. 71.	L'erain Hal	1111	-\0	al Kelimai	· \	·		+30	.58. G	es Balyum		
	72.	Saifullah	Khan	. 1			Bilyamin	<u> </u>	-+		PS Jawaro		A.V.P.
٠,	73	· .		N	iohd:Uma				- 38	3.01	Shundi Shandi		
	74.	Samiulla DARSA	MAND		Mohd:You	isaf	Jawaro C	inunui	- 1		CDS No.2		A.V.P.
		DAKSA	od Khan	.	MOHO. TO			arsamand	1 3	6.7)	<sub>เรากรรมท</sub> ูลภูติ		A.V.P.
:	75.	• '			Adam Kh	an	1 Jange 15	O 11 11 11 11 11 11 11 11 11 11 11 11 11			GPS Regi.	Magi	ľ
		Mohd:\	Walid	1			Regi		13	32.42	khel		A.V.P.
	76.	, i			Ahmad S	hah	1		<del></del> -	29.68.	GPS No.2	d	J
	ــا	Adil SI	hah	1			Jandi l	Jarsaman	in		Darsaman		1
	<u>, 77.</u>	} .			Khair D	ın					GPS No.	<u> </u>	A.V.P.
		Shajar	ud Din	=-	\					36.87	Mohd:K	nawaja	
1	78	·	ID:KHAW	AJA		. Mileon	Mohi	EKhawaj	146		1 :		
i		MOL	BARTIA		Nooral	i reihmi					CDE RA	bu Tung.	A.V.1
	<u> </u>	9. Jwali	Rohman		_\					46.93	101300		-\_\\
	l n							a matti					I A V.
•	\7		CH "			Shah	Umi	ar Abad			CPSS	iarki	1,7
*	17	KA	CH Shah		Adil S	Shah		hachs		46.57	GPS S	narki	12.1.

		·							•		
	1				-		grande for s	وعلفائها			
	4 . 1	pos sab l	FS TE		edeo()	panda trota (	imessing resonant 🛔	1.1			
	$\Lambda[V]$				Special series	messulf helpt	fui) usbirit [				
		pri opra, tata	11.81		authet	hit Timals	manifold (viety)	ii dh			
A.		nny oma sato	· 1		argret	ned 24 July 1017		ļ	1		
J.	A[Y] = i0	ազգություններ	7111		-		дершехия	401		٠,	
- '		de zudet		٧.	negret [	met dogs i			i	,	
d	$\Lambda N$	odry, cad to	7633		į	'	તાલાલું અલ્લ	[0,1]	i	:	
-		daza,M		$\Delta$	। जीव विकलाय 🏳	ned a draw (	negs(pensay	Title (			
.1		հայ լդ օրը հահեր 📗	61 11	$\int f_1$	ang compe	malet manner	and Linkani.	314			
	NA 1 100	lating a new Cally Co.	77.10	(_,	man'i L	ner Wind 9	that I have			-	
1	FA'A' 1	buidZ AisA 2415 🚉	40,114	10	•	1-	Edial Warri	$\sim S_{CO}$			
		quising f	1		migrect	Trabblah waxii					
	ra'v 🖳	deg 5 F98 Sd9 📜	10 ST				nuise nuise	911			
		ipung	i		Andonity [	արկորմու	Sailur Schusu				
	a Av	mesical Sal D	91		· · · · · · · · · · · · · · · · · · ·		Distribute	:			
					]	· į	Open Ment List	:			
i	- i		]		ļ		mort male no barales.				
ļ	· }	ļ.	ļ				on combinuo gurvolloj	• •			
i	: l	į	1				591, SESOIL LAVOVA			•	
1		İ	ļ				OF DMINIAMERS	SIL i			
		क्रांच्या ।				Cut Shah Ahmad	nnd Jahr SahoM.				
į	. <u> </u>	Chs Foot Kach	2635		Chapit Wazin	medal un Vinitali I	Mrwait inhaint!	111			
	d A V	CPS Loca Kach	81.73	111	Chapte Witzin		Kanail Khan				
	TAV	ibind bads 895)	LL'LY	ai	Chapri Wazin	Muchalishini	madel terbury	711			
:			70.14		Khanan Banda	mad iliasuly	Mental Aga Chan				
1	d A V	cparg isaqy 849	00.51	i u	Chapti Wazira	ned N slessA	Nationality	'611			
1	J.V.A	1004 L COS SdD 1		·	Chapta Maxica	und 21 mide 21	TOTAL ROBERT	•			
1	Talk Villa	Chs Rot Thalf	, , , , , , , , , , , , , , , , , , ,	1	-	!	T more section 1	(601	:		
			l porch	ì	nauch praies	Calotz drafts	Rushing Chin	391			
,	TRAY	mismil £658 8dD		- <del>  -</del>	ดูกลักษร				•		
	d'A'V	nample of SqD	! <u>76,8</u> t	1			CIVEONVEND	101	1		•
i			} •	<u> </u>	mb.	Hayat Maan	मानुस्य भागा ।	901	1		
;· ·	TANT	1062 Lost 2010	19778		ob.,	2 concerns which is	ի հանդերակիրությի	i sut			
	4.5 V	injury or mare	91.55	:	(hazad)	1	(4) history	_l	. 7		
	d'A V	iqued jury, (SAD)	<u> </u>	_		in a series control of	diffutions		. J		
<u> </u>		ups Fox 8dD	26.68		nji:	THE PROPERTY OF THE PROPERTY O	menuasi paans	101	•	والمعتمد المعتمد	s:
1	TAV	Chs Lumpoli		:	irlat		- :	701	سد ا		
	_dAV		1		anixad.		- Lawren numeri			11.	٠
:	dAV	Chs Myrvius			†Ani		inguist greaty		Ļ	_	
ĺ	TAV	GPS Turki Kalu			որդ	a madži himmi	habo Yabdol		, Ï		
i	-4  A V	իան արկ չպե	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	- 1	. rqu	and khan	Y		. 1	,	
	J'A'V	iqua con sab	3.35	1		agorer 1111111	V Total Total	' <b>!</b>			
- 1	TAN	Langer construct certi-	9/ [	"!			Annie Abbar , hadde inne	( ) The	, :	:	
:		Handh		İ	epinest irans	$\Lambda_{-1} = - \operatorname{mod} \Lambda_{\Lambda} R_{\mu}$	<b>1</b>		į		
1	-17AV	mazy 3d°	150	1			HIV:	1.	1.	!	
	i		1	1		1		وو أي	۱,		
ļ.	1	ի տեսալ	ı İ	1	igngan	afixallah (C)	at hade fands a	v   <del></del> -∵	- :		
1	dávy	ndmp sat	ু †ু	111	1.11.64.	· · · · · · · · · · · · · · · · · · ·		1 6.15	(i.e.	1	
		infin.	d [	_	lud relates	լի է կութրուն <u>Իսկ</u> ո	ed dedebed achine		6 <u>.</u> .	i I	
<u>i</u> :	VAB	[Spies 1 on 8d5	3.5	i	idonest (144)	Transfer and advantage				. [	
÷	JAV	pagy delt Sa	$O_{i}^{\dagger} = AC$	il I	Charles 1	' :	sing pho	W .	f)	٠ [.	
	0.15	ue ve	ST 1	1	Santage	mal 8 had a	19 (L.)			į*	
•		4 ppost (98) 8d	$\alpha_{1}^{+} = \pi V$	£1		1	ms. Ibdots mbd	:	(s	ì	
:	1' A A'			STEEL ST	gregete 2000	"11	- 1311a	on !		4	
	TAV	: .		* 1 m					D	*	
	<u> 1797</u>	: .		`  -	_	dough u	- contrarying			- 1	
	<u> </u>	opiquit, i Sil	D   188	ŀ	1. "	eq 1 deq 8 w	ing pathebut	$\mathbf{N}^{\perp}$	Mi.	- }	
- 1	TAY	linill Cost Se	9   39 10   32		richia de la companya	od! niG ba usun	MILL MALLS AND THE PROPERTY OF	IX		ĺ	
- 1	<u> </u>	Collection Season International Collection Season S	28		ll'	off milt barnen	old the bil ing met lanner ing historial		m . 68 i	}	The Assessment
	4 A V		28		ll'	od! niG ba usun	MILL MALLS AND THE PROPERTY OF			}	The same of the same
	1 A V	half Latter Half Cotter Uniff Cotter India C	10   SE 10   SE 10   SE		ll'	off milt barnen	MARGO TA obs. bdr with methories igz hiddelic	1X 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	68 I 1 - I		-
	4 A V		b	10 kg	Marian III	ed material ba ed met ba men	WARGOTTA ODA ODES DE WITH USE DESTRUCTION ODAS DESTREBIES	1X 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		[	The state of the s
	4 A V	A identify a series of the first tentral and tentral a	D   SS   SS   D   SS   D   SS   SS		ll'	ed material ba ed met ba men	nimacs) raf SARGO LIA ODA TOS AITI TOS TOS BEST TAIL TOS BEST TOS TOS BEST TOS	IX JUNE AND AND AND AND AND AND AND AND AND AND	88		The state of the s
	1 A V	A ideads S  toligoda  half Latt;  half Ealt;  half Ealt;  half Ealt;  half Ealt;  aladadad col	D   SS   SS     D	107	Property of the second	tion reductions  ed reduction  ed reduction	attA         niG bub           attA         numded and           both         both           att         place bub           att         nut but           att         nut but           att         historbate	1X	88 L8	1	The state of the s
	4.V.7 4.V.7 4.V.7 7.V.7	A identification of identifica	D   SS   SS     D	167   1015	Popular Popula	hed ned a des led ned a des ed ned a des ed ned a des	nite bub  nite bub  nite bub  nite bub  nord SARIGET LIA  SARIGET LIA  ind the bub	1X	88		
	4.V.7.	A LOSES  mily, oth  identity and a second of the second of	D   SS   SS     D	107	Property of the second	has had ales had nedla ales had nedla ales had nedla ales ed nedla di barnana	ind in inclusion	IX III III III III III III III III III	88 48 98		The state of the s
	4.V.7 4.V.7 4.V.7 7.V.7	A LOSES  mily, oth  identity and a second of the second of	D   SS   SS   P   S	75 30 767 0715	eugood eugo	hard and alas hard and alas hard and alas add and add har add and barman	ind in inclusion	IX III III III III III III III III III	88 L8		The state of the s
	4 A V	A nit1 featurd S S A nit1 featurd S S A 1,086 S A identity of identity S A identity of identity of identity of identity of identity of identity of identity is not seen in the identity of	D   SS   SS   SS   SS   SS   SS   SS	167   1015	Popular Popula	hard and alas hard and alas hard and alas add and add har add and barman	midal mominish but main midal midal midal midal mida bub mida bub midalah mida	IN Just 10 Jus	88 48 98		The state of the s
	4.V.7.	A nit1 featurd S S A nit1 featurd S S A 1,086 S A identity of identity S A identity of identity of identity of identity of identity of identity of identity is not seen in the identity of	D   SS   SS   P   P	767 30 1767 0718 1 98	equicos equico	to 1 to and 8 to 2 to 2 to 2 to 2 to 2 to 2 to 2 to	indial minimized by minimized by minimized but minimized but minimized minim	IN Just 10 Jus	88 48 98		
	1 A V	A finite formula of the control of t	D	75 30 767 0715	equicos equico	the 1 transfer of the 1 to 1 to 1 to 1 to 1 to 1 to 1 to 1 t	design to the final state of the first of th	one in the control of	88 48 98	- Acces	
	4 A V	A finite formula of the control of t	D   SS   SS   SS   SS   SS   SS   SS	767 30 1767 0718 1 98	equicos equico	to 1 to and 8 to 2 to 2 to 2 to 2 to 2 to 2 to 2 to	ded A miles pominist and miles pominist and miles and mi	one in the control of	58 <u>L8 1</u> 98 7 8		
	1 A V	A Lots A Lots A Lots A Lots A Lots A Lots A Lows A Lows A Lows A Lows A Lows A Lows A Louis A	D   SS   SS   SS   SS   SS   SS   SS	767 30 1767 0718 1 98	equicos equico	designations is sensited by the control of the cont	destry mindest prominest p	one in the control of	58 <u>L8 1</u> 98 7 8		A STATE OF THE PARTY OF THE PAR

-8

2% GOTA DISABLE 部 A.V.P. GPS Sarki Piala 29.67 Sarki Piala Bahadar Jang Mohsinullah No.1 Their appointment is made on contract basis in BPS-7 for three years which will be expected to continue TERMS & CONDITIONS on showing good performance/result and punctuality in attendance. They will also execute an agreement bond on prescribed form provided by the Govt of NWFP for three If any candidate is falled to resume his duty within stipulated period of fifteen days of the issue of this order of appointment, will be considered as cancalled If the ago of any condidate is less then 18 years or above per 38 years their appointment will also be considered as cancelled. 5. Charge report should be submitted to all concerned in duplicate 6. No.TA/DA is allowed. Their services are liable to termination at any time without reasons being assigned. 8. This appointment does not confer on them any right to claim seniority over their counter part or those who have higher made. & have not been appointed so far for one or other reasons 9: Their appointment is subject to further conditions that they are domiciled of Hangii Disidel 10 They will be governed by such rules & regulations as may be prescribed by the Govt: from time to time for the category of the Covt servants, which they belong to 11. Their pay will not be drawn by the concerned ODO till the processes of vertication of their documents is 12. The DDO is responsible for verification of their documents before handing/taking over charge & in case any of their documents proved fake; their appointment will be considered as cancelled without any right or privilege.

any over sight/mistake/amendments in recruitment policy by the Govt: is made, I will have no objection

15. They should be on probation period of three years & will neither apply for long leave or seek

(HAZRAT KHAN) DISTRICT COORDINATION OFFICER DISTRICT HANGU,

\_hereby give an undertaking to the effect that if

EndstiNo, 985-1117 /PST - Dated Hangu the 7 / 4 /04. Copy forwarded for information & necessary action to the:-Secretary Gover NWFP Schools & Litt Deptt:NWFP , Peshawar. Director of Schools & Literacy NWFP Peshawar. " District Coo. lination Officer Hangu: ٦. 1.1. District Nazion l'Illingit. .1 10 District Accounts Officer Hangii, 1750 €.

admussion in any college/university:

District officer (M) Edu:Local Office.

on my termination & also will not submit any petition in the court. 14. Health & agi- certificate must be obtained from Medical supdisconcerned

ADO Est:/T: (M/F) Local Office. 8-134: Candidates concerned. 135-250.School Con arned.

...13. <u>UNDERTAKING.</u>

EXECUTIVE DISTRICT OFFICER SCHOOLS & LITERACY HANGU.

CAMSIni Dunnushix Dated:-7-4-04

### Dist. Govt. KP-Provincial District Accounts Office Hangu Monthly Salary Statement (December-2023)



## Personal Information of Mr RAHEEM KHAN d/w/s of ZARWAR KHAN

Personnel Number: 00211349

CNIC: 1410147947483

Date of Birth: 12.12.1973

Entry into Govt. Service: 08.04.2004

80002017-DISTRICT GOVERNMENT KHYBE

Length of Service: 19 Years 08 Months 025 Days

**Employment Category: Vocational Temporary** 

Designation: PRIMARY SCHOOL HEAD TEACH

DDO Code: HG6048-

Payroll Section: 001

GPF Section: 001 GPF Interest applied Cash Center: 01

504,228.00 (provisional)

GPF A/C No: 211349 Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 15

**GPF** Balance:

Pay Stage: 16

J.	Wage type	Amount	Wage type	Amount
0001	Basic Pay	55,600.00	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	2148 15% Adhoc Relief All-2013	635.00
2199	Adhoc Relief Allow @10%	433.00	2316 Teaching Allowance 2021	3,224.00
2341	Dispr. Red All 15% 2022KP	5,211.00	2347 Adhoc Rel Al 15% 22(PS17)	5,211.00
2378	Adhoc Relief All 2023 35%	18,767.00		0.00

#### Deductions - General

	Wage type	Amount		Wage type	Amount
3015	GPF Subscription	-4,290.00	3501	Benevolent Fund	-1,200,00
3609	Income Tax	-882.00	3990	Emp.Edu. Fund KPK	-135.00
4004	R. Benefits & Death Comp:	-600.00	i		0.00 -

### Deductions - Loans and Advances

Loan		Description		Principal a	mount .	Deducti	on )	Balance
Deductions Payable:	- Income Tax 13,852.78	Recovered till DEC-	2023: 5,10	04.00 E	xempted:	3462,24	Recoverable:	5,286,54
Gross Pay (	Rs.): 97,0	01.00 Deduction	ons: (Rs.);	-7,107.00	1	Net Pay: (Rs.):	89,894.00	-
Pavee Nam	e: RAHEEM K	HΔN						

Account Number: 1124-0 PLS

Bank Details: UNITED BANK LIMITED, 210868 KAHI KAHI, HANGU

Leaves:

Opening Balance:

Availed:

Earned:

Balance:

Permanent Address: TURKI BANDA HANGU

City: HANGU

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: rahimkhanhpst@gmail.com

System generated document in accordance with APPM 4.6.12.9(210536/24.12.2023/v3.0)
\* All amounts are in Pak Rupees
\* Errors & omissions excepted (SERVICES/31.12.2023/17:38:46)

- SINX AM GOVERNMENT OF CHYBER PARHTUNKHWA ESTABLISHMENT DEPARTMENT (RECUENTION-WING) NOTHFICATION Daled Peshawar the 06 / 8-12020 in energiae of the powers conferred by section 25 of the powers confer The Civil Servants (Appointment, Promotion and Transport of Civil Servants (Appointment, Promotion and Transport Kin the Civil Survents (Appointment), Promotion and Transfell Rules, 1989, the Milling further neucondiness, shall be made namely: AMENDMENT in rule 7, sub-rule (5) shall be defeud. GOVERNMENT OF THE IDEY BER PAKETUNKHWA NO & EVEN DATE Additional Chief Secretary, Oovi, of Khyber Pakhtunkhwa, Planning & Cally is Impounded 103. The Senter Member Bourd of Revenue, Khyber Pakhrunkliwa. All Administrative Secretaries to Govi. of Khyber Pakhtunkhwa. Development Department. The Principal Secretary to Governor, Khyber Pakhlunkhwa, The Principal Secretary to Chier Minister, Khyber Pakhtunkhwa. All Divisional Commissioners in Khyber Pakhtunkhwa All Heeds of Anaclied Departments in Khyber Pekhiunkhwa. All Autonomous/Semi Autonomous Bodies in Khyber Pakhunkhwa All Deputy Comraissioners in Khyber, Pakhlunkhwa. The Registrar, Khyber Bakhtunkhwa Service Tribunal, Peshawar The Registrar Peshawar High Court, Peshawar. Min Score ary, Khyber Pakhunkhwa Public Service Commission, Pishawar The Department Administration Department All Section Officers in Establishment Administration Department 9. The Section Officer (Adma), Administration Department with the request to The Caretaker, Administration Department. arrange 20 gazette copies. (WA)WAH LATTI) DEBUTY, SECRETARY POLICY) ATTESTED Allelin

## **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)
- 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)



## COVERNMENT OF ICHARRI LYCOLOUROPAY ESTABLISHMENT DEPARTMENT No. SO(Polley)!! & A13/1-3/2020

Daled Pestinwer the June 06, 2023

The Government of Khyber Pakhumkhwa. Elementary & Secondary Education Department.

Subject: •

GUIDANCE REGARDING DELETION OF RULE 7(5) RULYDER PARRITUNICIWA GIVE, SERVANTS (APPO) PROMOTION AND TRANSPERS BULES, 1969.

I am directed to teler to your felter No. SO(Frimery-Myflæssup)/1-Dear Str. 2/Appointment/2023 dated 18.04.2023 on the subject noted above and to state that Sub-Rule (5) of Rule-7 of Khyper Pukhtunkhwa Clvil Resvants (Appointment, Promotion and Transfer) Rules, 1989 stands deleted vide this department soulfication dated 06.08.2020; thus, no provision exists to decide or forgo promotion.

- The basic regionale behind the delation of the ibid role is almed at preventing a civil servant from templation for liticit gain by sticking to a single lucrative post/position or to prevent those who tend to forgo premation to evade posting/transfer or show lock of capacity to tackle higher responsibilities in case of promotion. Therefore, it is obligatory upon every civil servant to necept promotion in every condition.
- Funhermore, 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 Pakhunktuva Givil Servants (Efficiency & Discipline) Rules, Yours falthfully,

2011, please

Undst. Of even Nn & Hale

Copy forwarded to the:-

1. P8 to Special Scerelary (Reg.); Establishment Department.
2. PA to Additional Secretary (Reg. II), Establishment Department.
3. P5 to Deputy Secretary (Policy), Establishment Department.

(thy mind IChan)

Table 71.6 1 43

dmeer (holley)

WP4442-2023 AZIZULLAH VS GOVT CF PG43

## GOVERNMENT OF KHYBER PAKHTUNKHWA ESTABLISHMENT DEPARTMENT (REGULATION WING)

To

The Government of Khyber Pakhtunkhwa <sup>1</sup> Elementary & Secondary Education Department.

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

Dea: Sir,

I am directed to refer to your letter No SO(Primary.M/E&SED/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.

- 2.5 The basic rationale behind the deletion of the ibid rule is aimid 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 together 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 constituen.
- in ther those officers/officials who do not comply with promotion order of the competent authority or to evade promotion through different means shall be proceeded, against under Khyber Paktaunkhwa Civil servants (Efficiency & Discipline) Rules, 2011, please

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

(Link ...), of even No & date

Cop., is forwarded to :-

 $\eta M$ 

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

Section Officer (POLICY)

# FOVERNMENT OF MMYBER PARHTUNKHWA ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT CIVIL SECRETARIAT PESHAWAR

(Phone No.091-9223587)

No.SO (Primary-M)/E8SED/2-6/2023 Daled Peshaviar Inc. June 25",2023

Τp

The Director

Elementary, & Secondary Education Department

Khyber Pakhlunkhwa, Peshawar.

Aziz Ullah Khan

President

All Primary Teacher's Association, KP

Subjection

JUIDANCE REGARDING DELETION OF RULE 7(5) IN THE KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION

AND TRANSFER) RULES, 1989.

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.

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

Encl: AA

(MUHAMMAD ISHAD) SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

SECTION OFFICER

WP4442-?753 AZIZULLAH VS GOVT CF PG43



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

Tro

The Director Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar

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

Subjects

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)

-WP4442-2023 AZIZULLAH VS GOVT CF PG43

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

A meeting regarding the subject matter was held on 04-07-2023 of 11:00 AM under the Chairmonship of Additional Secretary Establishment in his office. The following attended the meeting.

S∦	NAME .	DESIGNATION
1	Mr. Fazal Wahld	Deputy Director Establishment of Directorate Elementary & Secondary Education Department
2	ı Mr. Aziz Ulloh	Provincioi President All Primary Teachers Association Khyber Pokhlunkhwa
3	Mr. Rafagat Vilah	General Secretary APTA Peshawar
4	Muhammad Ishaq	Section Officer (Primary) E&SE Department Civil Secretarial Knyber Pakhtunkhwa Peshawar

- 2. The meeting started with recitation from the Holy Ouron. The chair welcomed the padicipants. 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 anward submission to Establishment Department for further necessary action.

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

(Mr. Fatal Wohld)
Deputy Director-i
EASE Department

(Mr. Relagal Ullah) General Secretary APTA Peshawar (Mr Aziz Ullah)
Provincial President
Kli Primary Teachers Association
Khyber Pakhlunkhvia

(Muhammad Linaq)
Section Officer (Primary-Male)
E2SE Department

(Abdullah) Addillonai Secretary (Establishmeni) E&SE Deparlmeni

WP4442-2023 AZIZULLAH VS GOVT CF PG43

1

MINUTES OF THE MEETING REGARDING APPLICATION SUBMITTED BY MR AZIZ ULLAH PROVINCIAL PRESIDENT ALL PRIMARY TEACHERS ASSOCIATION KHYBER PAKHTUNKHWA REGARDING OF 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

5#	NAME	DESIGNATION			
	Mr. Fazal Wahld	Deputy Director Establishment of Directorate Elementary & Secondary Education Department			
	Mr. Aziz Ullah	Provincial President All Primary Teachers Association: Khyber Pakhtunkhwa			
	Mr. Rafaqat Ullah	General Secretary APTA Peshawar			
4.	Muhammad Ishaq	Saction Officer (Primary) E&SE Department Civil Secretarial 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 threudbate discussion it was decided that Directorate of Elementary & Secondary Education Department may examine the case properly and submit & 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 Wahld)			٠.
Deputy Director-1 E&SE Department		1	<del></del>
Provincial President All Primary Teachers Association Khyber Pakhtunkhwa	· · · · · · · · · · · · · · · · · · ·	<del></del>	·i.
(Mr. Rəfaqat Ullah) General Secretary APTA Peshawar		-	······································
(Muhammad Ishaq) Section Officer (Primary-Male) E&SE Department			
	· .		
اعالمال ا	(Abdul		
WHATE	naj sascetan	WEEDHE	ង់មិទីដំរូវ)



Pliane: 091-9275344

Kliyber Pakhtunkhwa, Peshawar JR. No. 34/SST/MGeneral Cases

Dated 2-1-Email: establishmentmalel@gmall.com

The Section Officer (Primary-Mule), Elementary & Secondary Educultar Department, Klyber Pakhtunkhwa Peshawar...

Subject: -Dear Sir,

MINUTES OF THE MEETING

directed to refer to the latter No.SO(Primory-hne&SED/3-1/ G.Mixc/Minites of the Meeting/PST/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 Khyber Pakhtunkhwa Establishment Department (Regulation Wing) delated Rule 7/4) in the Civil Servants (Appalatment, promotion & Transfer Rules 1989) vide notification No. No. SOR-VI (E&AD)/1-3/2020 dated 06-08-2020.

That this office sought guidance from your good office in the fallowing words vide letter No.6987 dored 06-02-2023.

(i) Now it habilgainry upon the civil servant to accept Promotion in every condition. (ii) It is the prerogative of the civil servant to either accept or turn down the offer of

promotion. That your gold office forwarded the same to the quarter concerned vide letter

No.SO (Primary-M) E&SED/2-2/Appointment/2023 for necessary guidance.

That the Gavestiment of Khyber Pakhtunkhwa Establishment Department (Regulation IVing) vide letter No.SO (Policy) E&A D/1-3/2020 dated 6-06-2023 categorically stated that there exists no provision to 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-M) E&SED/2-2/Appointment/2023 dated 12-06-2023.

That, in the light of the minutes of meeting dated 6-07-2023, held under the Chairmanship of Hon, Additional Secretary Establishment at his office this office, has heen asked fee submission of consolidated case.

In view of the above, this office is of considered opinion that the deletion of Rules 7(5) have affected negatively a linge numbers of Female Teachers. Thur it is proposed that Teachers heland OPS-16 may be exempted of implications of the amendment in the rules ibid provided they summit their written refusal prior to conduction of the meeting of Departmental Fromotion Committee.

The case is submitted for perusal and necessary actions please.

Assistant Director (Estab MI-I) Elementary & Secondary Education Khyber Pakhtinkhwa

Endst: No.

Copy of the above is to:-

1. PA to Director Local Directorate.

Master Copy.

Assistant Director (Establit-1) Elementary & Secondary Education Khyber Pakhtunkhwa

WP4442-2023 AZIZULLAH VS GOVT CF PG43

PESHAUME. DIRECTURATE OF ELEMENTARY & SECONDARY EDUCATION, KPK

14PL) Perhauser Elementicay & Secondary Education Department Section Official (Primary-Male)

Subject : Minutes of Meeting

:01

Ainstes of meeting 121/23 dated 10-7-52 on Estyles are abject about and about Dear Sir) of an alverted to refer to heller No. (50 himay -M) E & SED /5-1/6, Mish

delated reflect in Civil Services (Apprintment promotions Timber Bla 1999) (Brilly outself of to Establishment depositions) fort . present biret history, about background of cours as unches:

wards vide letter no 6983 dialed ob-or-sorg Thus till office sought guidance from your good wiffer in the following vide notification No. No. SOR-VI(ESAD) 1-3/2020 dated ob-08-2020.

ant amaborest (hyposon railles of triovess livis to evitorgerary Ei-18(ii) . nothernord toposos at theorese line may bretopishe si ti would is

offer of free forwarded the come to quester concerts of meeting. It EGED 12-2 Apprintment (2023 for recessory

seniors to ciccept ponishin under energy condition. I'm's brows may brokelide si te coordinang graft will sob of norahard an Etalo 12070 dated 6-06-2073 eategoically stated that there exists . That the government of KP-ED (Regulation Whys) vide letter No. So (Relicy)

for risissurraise of bills ned been asked for suffice that held uncles the Chairmanship of the Additional Secretary Establish. Cros-Fo-2 betab gribson ant to esturien ant to imply in hant .

rembers of Ferrale decichiers. eminings beneatizenes to 21 softe with syncho at to work the more soft that again to the work of the solution of contacts and the solutions of

The case is submitted for period and necessary action

please.

2. Master Copy

Copy of the chave to:

1. AA to Director Local Directorate

Khyles Richlinghung, Demandary & Secondary Education Authora Director EADY 40 TVOD RV HAJJUSISA 6505-59449W





## ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT CIVIL SECRETARIAT PESHAWAR (Phone No.091-9223587)

ivo. SO(Primary-M)E&SED/2-2/Appointment-Rule /2023 Peshawar Dated 23rd August, 2023

Annexuse

The Georgiany to Govi, of Khyber Pakhtunkhwa, Establishment & Administration Department,

SUBJECT: - GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE CIVIL SERVANT (APPOINTMENT, PROMOTION & TRANSFER RULES <u> 1989).</u>

Caret Sit.

I am directed to refer to your letter No. 50(Policy)/ E&AD/ 1-3/2020 dated 067 June 2023, and to state that after deletion of rule 7(5) Khyber Pakhtunkhwa Civil Servers (Appibniment, Promotion & Transfer Rules 1989) it has been intimated that those officers/ officials who do not comply with promotion order of the competent authority or יסי עם evade promotion through different means shall be proceed under Khyber Fakriounkirwa Civil Servant (Efficiency & Discipline) Rules, 2011.

In this connection it is submitted that in some cases lady teacher of primary level who avail such promotions have to face serious inconvience 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 of mother-in-law who need care. In such cases, there are negative effects on service delivery.

In view of the above, the said amendment may be reconsidered to the

extent of lawy teacher in primary schools.

(MUHAMMAU IS SECTION OFFICER TPRIMARY MALE

Copy Conviarded to the:

 Director E&SE Khyber Pakhtunkhwa. 2. PS to Secretary, EBSE Department Knyber Pakhtunkhwa.

SECTION OFFICER LERIT

Scanned with CamScanner

WP4442-2023 AZIZULLAH VS GOVT CF PG43

Coschergethous botal emerles? 10.50 (Prinzay - M) E & SED + 8-8/

-777-

Peghauser. Establishmonst and Adminishation Departments, The secretary to Government of Khylon Patchenophua.

(686t : Civil Servicins (Appointment, Romation & Transfer Rules. Quidance regarding deletion of Rule 7(2) in the SUBJECT:

with state of larin Economicated portate and 18-2/ 9 and directed to refer to your letter No. softhing (Korios) (Et 40 YiS wooQ

Civil Servant (Efficiency and Discipline) Rule 2012. different means shall be proceed under Khyber flekhtrinkhung about nortened shows of but to bloodly a treatespines with to those officers officials who do not comply with promotion order Partition and Transfer Rules 1989) 94 has been instinuted that deletion of Rule 7(5) Whyber Rethaunthwa Civil Servant (Apprintment

- steads broad of valout book to broke of effects on seave delivery.
In view of above, the soil ammendment may be reconsidered to Mather-in-low who need agre. In such again their are negative Most of them are married with bills and elder father of , while teaperact / sociabises on other Enothers tratomer aft oil satub enoting of every hour shirts show to people duties it such richemond hour away bevol event proming to restant In this connection it is submitted that in some coust lacky

Section offices (Principle) (patel bannothin)

PS to Secretary, E & SE Prophers & Shirlex At Brookers of 29 Director E& SE Khylos Itekhnykhung

Caty formanded to:



# GOVERNMENT OF KHYBER PAKHTUNKHWA ESTABLISHMENT DEPARTMENT

No. SO(Policy)E&AD/1-3/2020 Dated Peshawar the September 07, 2023

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)

# 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.



# - B/C-

# GOVERNMENT OF KHYBER PAKHTUNKHWA ESTABLISHMENT DEPARTMENT No. SO(Policy)E&AD/1-3/2020

Dated Peshawar the September 07, 2023

Tc

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

Subject: -

GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE KHYBER PAIGHTUNKHWA 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)

## Endst. Of even No & date

Copy forwarded to the:-

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

Section nicer (Policy)

WP4442-2023 A2IZULLAH VS GOVT CF PG43,

Annexure - G

 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/1-312020, 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 let - 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 not meation 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  $\eta/06\text{-}68\text{-}2020$ . 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 Escaplishment & Administrative Department vide No SO(Primary-M) E&SED/2-2/Appointment Rule/2023 dated 23-08-2023 to reconsider the amendment made in Khoner 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 decine 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, 20:1.

It is, therefore, humbly prayed that on the acceptance of the instant representation; the Notification bearing No. SO (POLICY) 200/1-3 1-2020 DATED 06/08/2020, communicated to vide letter dated 06 36/2023, may please be declared and ordered to be struck down perso Void, Ultra vires to the Constitution of Pakistan and against the fundamental principles of natural justice.

раве**і 16\_/0<u>3</u>/202**4

Philler KHAN SID ZARWAR KHAN PSHT.

- Learned counsel for the appellant present.
- Let a pre-admission notice be issued to the respondents dirough TCS for submission of raply/comments. Appellant is directed to deposit FCS expenses within three days. To come up for reply/comments as well as preliminary hearing on 10.06,2024 before S.B. P.P given to learned counsel for the appellant.

03. Alongwith the service appeal there is an application for suspension of Notification dated U6.06.2023 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.

decrified to be true copy(Muhammad Akbar Khan) Member (E)

Samp (d) :

Date of Co.

Date of Order of Copyr 12-6-13

CS CamScanner

APTA House: Govi. Primary School No.4. Gulbehar Poshawar City.

آل پرائمری ٹیچرز ایسوی ایٹن (اپٹا) خیبر پیخنونخو آ

Annexure - 1

بمالب: میکرلری ایکنٹری ۵۰ میکنادی ایومیش نیبر پیٹن نوا منہائب: ال پراتری لیپرز داردی ایش نیبر پیٹو عما بناب مالی

گزارٹی ہے کہ پروسوشنز ہر ادارے علی ہوتے ہیں ہو کہ سرکاری مااوم کی خواش ہوئی ہے پردسوشنز کا ایک قانون ہؤا کر تاقا کو جر مااوم ایک اگریمی مجور کے تحت ایک وقد پردسوشنز نہ لیل تو وہ محر آسمدہ چار سال تک پردسوشنز تھیں سے سختے سے سطلب چار سال تک پردسوشن مجر این قانون علی تعودی دعایت دی محلی چار سال والی بات محتم کر دی محل کے اگر ایک مااوم میک سال پردسوشن نہ لین تو وہ دو مرے سال نے سکتا ہے۔ میکن اس ایک مفتر ہوئے ہے۔

میر این علی طوری مقایت دی می جد میں وال بات ہم میں کا حدام ہیں میں ہوت میں یہ وہ دو مرسے میں سے سوسیے اس میں ا میکن آب ایک ان ایک ایک ایک ہوت ہے ایک ہوت کہا ہے ایک اور کو کھیلیٹوں ہوا ہے ہم ایک کاروائی کر دائی کر کے کا کہا کیا ہے جس سے مطابق کاروائی کر لے کا کہا کیا ہے جس سے مطابق کاروائی کر لے کا کہا کیا ہے دراصل یہ آئوں کو ٹیکٹیٹوں بلیادی المسائی طوق کی کھی طالب درای ہے میں مان کی دور درال اور پہڑی طاقوں کی میں مان کی میں امان مسائل مسائ

جیسہ عام حالات ٹن کی ڈیردئی پروس ٹن اور وروواز جیجا کی بیادی البائی مقتل کی خلاف درای ہے کہ کا فیبر پختو تھ اس پر دشتی سے خلاد آئی دشمیاں میں اور اللہ میں البائی مقول کی خلاف ہے میں اور اللہ میں یہ برنی اور بیاری انسانی مقول کی خلاف ہے میں اور اللہ میں اللہ

ام ای سے خلف تالوئی چارہ جوگی کا ان میں مخوظ دیکے اور اور اور اور کی کا ان میں مخوظ دیکے اور الدوا ایک کی است اور الدوا کی است کا اور الدوا کی است اور الدوا کی است میں کر کہ برائری است کا اور الدوا کی است کا اور الدوا کی است کا اور الدوا کی است کا اور الدوا کی است کا اور الدوا کی است الدوا کی است کے اور الدوا کی است کی الدوا کی است کی الدوا کی است کی الدوا کی الدوا کی الدوا کی است کی الدوا کی کاروز کی الدوا کی ال

کے مک لوفیصیٹن جاری موسے تی پراتمری اسالاء کو ایک طور پر لاد پر کرلے کا سلسلہ شردٹ موریکا ہے : ابدا ہم یہ توقع مکتے ہیں کر آپ ساحبان لودی ایکشن لیکر موب بمر سے ہداتمری اسالاء خسوسا لمیمیل پراتمری اسالاء کو این ادیت سے مہات دااکیں کے

عرر الله خان صوبانی مدر المرافق المرا

. - Nagrakan ngan Azizini LAH VS GOVT CE PGA

X

# URKALAT NAMA

# BEFORE THE SERVICE TRIBUNAL PESHAWAR

RAHEEM KHAN

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.

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

**APPELLANT** 

ACCEPTED

MUHAMMAD MUAZZAM BUTT

Advocate Supreme Court

MUHAMMAD ADKEL BUTT

Advocate High Court

BASSAM AHMAD SIDDIQUI

Advocate High Court