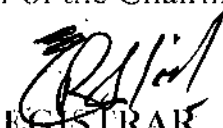


FORM OF ORDER SHEET

Court of _____

Appeal No. 1879 /2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/10/2024	<p>The appeal of presented today by Mr. Tahir Sajid Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on 28.10.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

S.A # 1879/2024

BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA

Fakhrudin.....Appellant

Versus

Secretary to Government of Khyber Pakhtunkhwa and
others.....Respondents

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1.	Appeal and verification	-	1 to 5
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3.	Copy of monthly salary account and F.A.D	"A"	7 & 7A
4.	Copy of notification No. SO(Policy)I.V AD/1-3/2020	"B"	8 to 9
5.	Copy of impugned letter dated June 6 th , 2023	"C"	10
6.	Copy of minutes of meeting dated 06.07.2023	"D"	11 to 14
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ADVOCATE

BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA

Service Appeal No. 1879/2024

Fakhrudin son of Abdul Sabookh PSHT (BPS-15) at GPS
Bela Mutraian, Manshra Date of Appointment
.....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 NO. SO(Policy)E&AD/1-
3/2020 DATED 06.08.2020 COMMUNICATED BY
RESPONDENT NO. 2 VIDE LETTER DATED
06.06.2023 WHEREIN IT WAS STATED THAT SUB
RULES 5 OF RULE 7 KHYBER PAKHTUNKHWA CIVIL
SERVANT (APPOINTMENT, PROMOTION AND
TRANSFER) RULES, 1989 STANDS DELETED.**

P R A Y E R:

**ON ACCEPTANCE OF INSTANT SERVICE APPEAL,
THE IMPUGNED NOTIFICATION NO.
SO(Policy)E&AD/1-3/2020 DATED 06.08.2020
COMMUNICATED BY 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 HONORABLE
TRIBUNAL DEEMS FIT AND PROPER IN THE
CIRCUMSTANCES OF THE CASE MAY ALSO BE
GRANTED TO THE APPELLANT.**

Respectfully Shewath!

- 1) That, the respondents Department appointed the
appellant as Primary School Head Teacher.
(Copy of appointment letter is
annexed as Annexure "A")

- 2) That, the Khyber Pakhtunkhwa (Appointment/Promotion/Transfer) Rules, 1989 as well as other sister services of the other provinces and Federation as well, availing of promotion by the employee 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 conditions 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, Promotion Rules, 1989.
- 4) That, Government of KP without following the rules position mentioned in Para 6 above promulgated notification SO(POLICY)E&AD/1-3/2020 dated 06.08.2020 communicated to respondent No. 2 vide letter dated 06.06.2023 wherein, it has been made mandatory to the employee 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. SO(POLICY)E&AD/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 notification number SO(POLICY)E&AD/1-3/2020 dated 06.08.2020.

(Copy of impugned notification No. SO(POLICY)E&AD/1-3/2020 dated 06.08.2020 is annexed as Annexure “B”)

- 6) That, the Director of Elementary and Secondary Education KPK, 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 06.06.2023 directed the respondent no 3 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 annexed 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 and 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 Rules, 2023 dated 23.08.2023 to reconsider the amendment made in KPK Civil Servants, Appointment, Promotion and Transfer) Rules, 1989 as it had negatively affected a large number of teachers.

(Copy of letter dated 23.08.2023 is annexed as Annexure "E")

- 9) That, the respondents, vide its letter dated 07.09.2023 directed the Directorate of Elementary & Secondary Education KPK 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 KPK Civil Servants (Efficiency & Discipline) Rules, 2011.

(Copy of impugned letter dated 07.09.2023 is annexed as Annexure "F")

- 10) That, the petitioner feeling aggrieved, filed representation to 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 letter dated 06.06.2023 and 07.09.2023 and the deletion of Rule 7(5) in KPK Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the petitioner file 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 notification cannot be

(5)

Prayer:

It is, therefore, humbly prayed that on the acceptance of the instant service appeal; the impugned notification bearing No. SO(POLICY)E&AD/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.

Faleh
Appellant

Through: -

Tahir Sajid

Tahir Sajid Advocate
High Court, District
Courts, Manshra

Affidavit
I (the appellant) solemnly declare that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honorable Tribunal.
Faleh

ATTESTED
[Signature]
08/10/24

6

**BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA**

C.M No: _____ -P of 2024-10-08
in Ref to
Service Appeal No. _____ /2024

Fakhrudin.....Appellant

Versus

Secretary to Government of Khyber Pakhtunkhwa and
others.....Respondents

**APPLICATION FOR SUSPENSION OF IMPUGNED
NOTIFICATION BEARING NO. SO(POLICY) E&SD/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 appellants.
- 3) That, there is likelihood success of the appellant in the lis. And if the notification bearing No. SO(POLICY)E&AD/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 right of the appellant is involved in this case.

In view of the reason, it is humbly requested that the notification bearing No. SO(POLICY)E&AD/1-3/2020 dated 06.08.2020, communicated to respondent No. 2 by respondent No. 1, vide letter dated 06.06.2020 may kindly be suspended till the final disposal of the main appeal in hand.

Appellant

Through: -

Tahir Sajid Advocate
High Court, District
Courts, Manshra

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 Honorable Tribunal.

Fakhrudin

OFFICE OF THE DISTRICT EDUCATION OFFICER, (MALE), PRIMARY MANSEHRA.

OFFICE ORDER NO. 317-A...../

DATED MANSEHRA THE 12/11/96

APPOINTMENT

Consequent upon their selection on merit the following PTC trained candidates are hereby appointed in the Schools mentioned against each in BPS-7 @ Rs.1480-81-2695 per month plus usual allowances as admissible under the rule with effect from the date of their taking over charge in the interest of Public Service.

S.NO.	Name & Father's Name	R/O	School	Remarks
1	Rafique Hussain S/O Abdur Rehman	Shamdihara	GPS Dheri Halim	A/V/P
2	Luqman S/O Muhammad Miskeen	Shanai bala	GPS Bela Tanda	A/N/P
3	Ibrar Ahmad Khan S/O Muhammad Sarfaraz	Battal	GPS Nadrav	A/V/P
4	Fazal-ur-Rehman S/O Abdur Rehman	Tarngrri bala	" Jaba Malikpur	A/N/P
5	Fakhr-ud-Din S/O Abdul Aziz	M/Baffa Kalan	" Hajiabad	A/V/P
6	Muhammad Riaz S/O Muhammad Haroon	Baffa	" Mera Babral	A/N/P
7	Iftikhar Ahmad S/O Abdur Rashid	Noxhazi	" Chiti Dheri	A/V/P
8	S. Niaz Ali Shah S/O Sher Shah	Batang Syedan	" Mera Babral	A/N/P
9	Muhammad Iqbal S/O Shah Nawaz	Jabee	" Labarkote	A/V/P
10	Saeed-ur-Rehman S/O Abdur Rehman	Shinkiani	" Jambra	A/N/P
11	Muhammad Hanif S/O Muhammad Fareed	Chikya	Msq: Pitaosharay	A/V/P
12	Abdul Malik Khan S/O Abdul Hamid	Susairali	GPS Jambra	A/N/P
13	Razaqat Ali S/O Khaista Khan	Hass	Msq: Lala Zar	A/V/P
14	Naheem-ud-Din S/O Hamid-ud-Din	Paris	GPS Chapra Choshal	A/V/P
15	Shafiqat Hussain S/O Said Umar Khan	Shaotar	" Gul Dheri	A/V/P
16	Muhammad Hanif-ul-Haq S/O Muhammad Marool	Bherkund	" Naka Babral	A/N/P
17	Muhammad Rafique S/O Muhammad Ashrif	Behali	" Gaungat	A/V/P
18	Nadeem Hussain S/O Nazir Hussain	Trana	" Belyani	A/V/P
19	Mubarak Ali Shah S/O Said Ali Shah	Dap No.1	" Khadang	A/V/P
20	Shah Khalid S/O Jahan Zeb	Trangri Bala	" Naka Babral	A/N/P
21	Aziz-ur-Rehman S/O Muhammad Fareed	Mang	" Kasay Shatal	A/V/P
22	Abdur Razaq S/O Ghulam Hassan	Kanshian	GPS Guidheri	A/V/P
23	Sajid Khan S/O	Gulibagh	GPS Bandu Tatar	A/N/P

Approved 14.11.1996

The appointments have been made in accordance with the Notification No. SO/17/1 dated 1/07/1993 by the formula 50% on merit and 50% on reservation.

They will be governed by the prescribed Rules of the Government of Karnataka. The candidates from Medical Superintendent (M.D. Hospital) category will not be eligible to produce any health certificate. They should not be considered for the charge if they are below 18 years and above 30 years. The original certificates should be checked thoroughly before handing over the charge and should not be handed over if their original certificates are not found correct. The original Academic/Professional certificates should be submitted to the Director of Medical Education/Professional Education. The appointment is subject to the verification of their termination at any stage without assigning any reason/notice. The appointment is purely on temporary basis & liable for cancellation. They should submit their leave reports to all concerned authorities.

7/58800KH

Sl. No.	Name	Qualification	Category
1	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
2	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
3	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
4	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
5	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
6	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
7	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
8	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
9	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
10	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
11	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
12	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
13	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
14	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
15	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
16	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
17	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
18	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
19	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
20	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
21	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
22	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
23	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
24	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
25	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
26	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
27	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
28	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
29	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P
30	Dr. S. S. S. S.	B.A., B.L., S/O	A/V/P

tuency basis.

126

(HAQ NAWAZ KHAN)
DISTRICT EDUCATION OFFICER,
(MALE) PRIMARY MANSEHRA.

No. 7484-7529... / Dated Mansehra the 12/11/1996.


Copy forwarded to the

Registrar High Court Circuit Bench Abbottabad.

Sub-Divisional Edu: Officer. (M) Mansehra.

Distt: Accounts Officer Mansehra.

All the candidates concerned.


DISTRICT EDUCATION OFFICER,
(MALE) PRIMARY MANSEHRA.

(7A)
Dist. Govt. KP-Provincial
District Accounts Office Manshra
Monthly Salary Statement (August-2024)

A

Personal Information of: Mr FAKHR UD DIN d/w/s of ABDUL SABOOH

Personnel Number: 00219248 CNIC: 1350128437865
Date of Birth: 05.07.1976 Entry into Govt. Service: 14.11.1996

NTN:
Length of Service: 27 Years 09 Months 019 Days

Employment Category: Active Temporary

Designation: SENIOR PRIMARY SCHOOL TEA

80003206-DISTRICT GOVERNMENT KHYBE

DDO Code: MA6145-Manshra

Payroll Section: 001

GPF Section: 001

Cash Center: 1

GPF A/C No: EDUMA11809

GPF Interest applied

GPF Balance:

847,753.00 (provisional)

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 15

Pay Stage: 21

Wage type		Amount	Wage type		Amount
0001	Basic Pay	65,500.00	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	796.00
2199	Adhoc Relief Allow @10%	535.00	2316	Teaching Allowance 2021	3,224.00
2341	Dispr. Red All 15% 2022KP	6,208.00	2347	Adhoc Rel Al 15% 22(PS17)	6,209.00
2378	Adhoc Relief All 2023 35%	22,232.00	2393	Adhoc Relief All 2024 25%	16,375.00

Deductions - General

Wage type		Amount	Wage type		Amount
3015	GPF Subscription	-4,290.00	3501	Benevolent Fund	-1,200.00
3609	Income Tax	-5,138.00	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	500,000.00	-14,000.00	94,000.00

Deductions - Income Tax

Payable: 82,198.80 Recovered till AUG-2024: 10,276.00 Exempted: 20549.00 Recoverable: 51,373.80

Gross Pay (Rs.): 128,999.00 Deductions: (Rs.): -25,363.00 Net Pay: (Rs.): 103,636.00

Payee Name: FAKHR UD DIN

Account Number: 3083253151

Bank Details: NATIONAL BANK OF PAKISTAN, 231372 DAB NO. 1 DAB NO. 1, MANSEHRA

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: MANSEHRA

City: MANSEHRA

Temp. Address:

City:

Domicile: NW - Khyber, Pakhtunkhwa

Email: fakhruddinqrashi@gmail.com

Housing Status: No Official

System generated document in accordance with APPA 1.6.12.9150399005/27.08.2023/63.00

* All amounts are in Pak Rupees
* Errors & omissions excepted (SERVICES/01.09.2024/02.38.39)

AMENDMENT

B 8

GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(REGULATION WING)

NOTIFICATION

Dated Peshawar the 06/18/2020

In exercise of the powers conferred by section 26 of the
Khyber Peshawar Civil Servants Act No. XVIII of
1973 (Khyber Peshawar Civil Servants Act No. XVIII of
1973) (Khyber Peshawar Civil Servants Act No. XVIII of
1973) the Chief Minister (Appointment, Promotion and Transfer) Rules, 1989, the
following further amendment shall be made, namely:

AMENDMENT

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

CHIEF SECRETARY
GOVERNMENT OF THE KHYBER PAKHTUNKHWA

DATE AND EVEN DATE

Copy forwarded to:

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



DEPUTY SECRETARY POLICY
(W/ADDAH LATIF)

(Signature)

(Handwritten mark)

4-11-2020

9

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 XVII) 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)

Attested
Deputy



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
No. SO(Polcy)I&AD/1-2/2020
Dated Peshawar the June 06, 2023

62

AMIR
C
10

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

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

Dear Sir,

I am directed in refer to your letter No. SO(Polmory-MYR&SUD/2-
Z/Appointment/2023 dated 10.04.2023 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 06.06.2023 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 seeking to a single lucrative post/promotion 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,

(Signature)
Section Officer (Polcy)

ASE
M-
716

(Signature)

Encl. Of even No & date

Copy forwarded to:-

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

(Signature)

RECEIVED
ESTD 2023
JUN 21 2023

Section Officer (Polcy)

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(Signature)

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
CIVIL SECRETARIAT PESHAWAR
(Phone No.001-9223507)

No. SO (Primary-M)/E&SED/2-5/2023
Dated Peshawar the June 26th 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, 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

[Handwritten mark]

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

Copy forwarded to the:

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

[Handwritten mark]

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

Attested
[Handwritten Signature]

12

No SO (Primary-M)/E&SED/2-6/2023
Dated Peshawar the June 25th 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, 1909.

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)

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13

MINUTES OF THE MEETING REGARDING APPLICATION SUBMITTED BY MR. AZIZ ULLAH PROVINCIAL PRESIDENT ALL PRIMARY TEACHERS ASSOCIATION KHYBER PAKHTUNKHWA REGARDING DELETION OF RULE 7(S) 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.

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. Razaqal 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. Razaqal Ullah)
General Secretary APTA
Peshawar

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

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

WP4442-2023 AZIZULLAH VS GOVT OF POK

Attested
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15

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/N	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)

Attested
Apt

AMENDED

15

PRIMARY AND SECONDARY EDUCATION DEPARTMENT
CIVIL SECRETARIAT PESHAWAR
(Phone No.091-8221587)

No. SC(Priary-M)ESSED/2-2/Appointment-Rule /2023
Peshawar Dated 23rd August, 2023

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

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

Dear Sir,

I am directed to refer to your letter No. SO(Policy) EAD/1-3/2020 dated
07 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.

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

SECTION OFFICER (PRIMARY MALE)
IAUHANIAND (SHADI)

SECTION OFFICER (PRIMARY MALE)
20/09/23

Copy forwarded to the:

- 1. Director ESSE Khyber Pakhtunkhwa,
- 2. PS to Secretary, ESSE Department Khyber Pakhtunkhwa.

WP4442-2023 AZIZULLAH VS GOVT CP FB43

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2. PS to Secretary, E & SE Department, Khyber Pakhtunkhwa
1. Director E & SE Khyber Pakhtunkhwa
Copy forwarded to:
(Muhammad Ishaq)
Section Officer (Primary)
(M.A.C.)

In this connection it is submitted that in some cases locally 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 locally teacher in primary schools.

Dear Sir,
I am directed to refer to your letter No. SO (Primary) (Policy) / E & AD / 1-3/2020 dated 04 June 2023 and to state that after deletion of Rule 7(5) (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.

SUBJECT: Guidance regarding deletion of Rule 7(5) in the Civil Servant (Appointment, Promotion & Transfer Rules 1989).
The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department, Peshawar.

To
No. 5 (Primary-M) E & SE / 1-3/2023
Appointment - Rule / 2023
Peshawar Dated 29th August, 2023.

Handwritten number '18' in a circle at the bottom left.



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

AMM

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(17)

Handwritten notes and signature

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

Subject: GUIDANCE REGARDING DELETION OF RULE 7(S) 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 23.05.2023 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)

Encl. 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.

Vertical stamp: WPA 147/2023 A71181 LAH VS GOVT CP PG 13

Handwritten initials

18

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)

Attesting
[Signature]

Ally
Ally

Attendant Director
Elementary & Secondary Education
Khyber Pakhtunkhwa

2. Master Copy

1. PA to Director Local Directorate

Copy of the above to:

Please. The case is submitted for perusal and necessary action members of female teachers. In view of the above, this office is of considered opinion that the deletion of Rules 7(S) have effected negatively a huge

consolidated case. That in light of the minutes of the meeting dated 6-07-2023 held under the chairmanship of Mr. Additional Secretary Education at his office. This office has been asked for submission of

That the government of KP-ED (Regulation wing) vide letter No. SO (Policy) E&AD/1-3/2020 dated 6-06-2023 accordingly stated that there exists no provision to clarify / forgo promotion. It is obligatory upon every civil servant to accept promotion under every condition.

That your good office forwarded the same to quarters concerned vide letter No. SO (Promotion) E&AD/2-2/11/2023 for necessary guidance.

That your good office forwarded the same to quarters concerned vide letter No. SO (Promotion) E&AD/2-2/11/2023 for necessary guidance.

That this office sought guidance from your good office in the following vide notification No. Nil. SOP-VI (E&AD) 1-3/2020 dated 06-08-2020.

That Government of KP Establishment department (Regulation wing) deleted rule 7(S) in Civil Servant (Appointment/Promotion) Transfer (Rule 198) present being history, and backward of case as under.

Minutes of meeting 13/7/2023 dated 10-7-2023 on subject cited above and to Dean Sir, I am directed to refer to letter No. (SO) Finney-M) E&AD/5-1/G/2023

Subject: Minutes of Meeting

KPK, Peshawar
Elementary & Secondary Education Department
Section Officer (Primary-Male)

PESHAWAR
(21-7-2023)

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION, KPK

-B/C-

19

Handwritten notes and signatures at the top left of the page.

WP442-2023 AZIZULAH VS GOVT OF PG43

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

1. PA to Director Local Directorate.
 2. Master Copy.
 Copy of the above is in:

Assistant Director (Establishment) -1
 Elementary & Secondary Education
 Khyber Pakhtunkhwa
 17/02/23

The case is submitted for perusal and necessary actions please.

Departmental Promotion Committee.
 Teachers below No. 16 may be exempted of implications of the amendment in the rules held
 75) have effected negatively a large number of Female Teachers. Thus it is proposed that
 in view of the above, this office is of considered opinion that the retention of rules
 been asked for submission of consolidated case.
 Chairman of Khyber Pakhtunkhwa Secretary Establishment at his office this office has
 That, in the light of the minutes of meeting held 6-07-2023 held under the
 (Primary-4) E&SED/2-2/1/2023 dated 12-06-2023.
 The same was received by this office from your good office vide letter No.50
 civil servant to accept promotion under every condition.
 that there exists no provision in decline or forgo promotion. It is obligatory upon every
 (Wing) vide letter No.50 (Policy) E&AD/1-1/2023 dated 6-06-2023 categorically stated
 That the Government of Khyber Pakhtunkhwa Establishment Department (Regulation
 No.50 (Primary-4) E&SED/2-2/1/2023 for necessary guidance.
 That your office forwarded the same to the quarter concerned vide letter
 promotion.
 (ii) It is the prerogative of the civil servant to either accept or turn down the offer of
 No.6987 dated 16-02-2023.
 That this office through guidance from your good office in the following words vide letter
 No.50 (Primary-4) E&SED/2-2/1/2023 dated 06-08-2023.
 That Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing)
 dated Rule 75) in the Civil Servants (Appointment, promotion & Transfer Rules 1989)
 wide notification No. No. SOH-1 (E&AD)/1-1/2023 dated 06-08-2023.
 I am directed to refer to the later No.50 (Primary-4) E&SED/2-1/
 G.M/1/1/2023 dated 10-07-2023 on the subject cited above and in
 present brief history about the background of the case as under:

Subject: - MINUTES OF THE MEETING
 Khyber Pakhtunkhwa Education,
 Elementary & Secondary Education Department,
 The Section Officer (Primary-Male),

Phone: 091-9223344 Email: establishmentinfo@gmail.com

Khyber Pakhtunkhwa, Peshawar



20

بخدمت جناب سیکرٹری تعلیم خیبر پختونخواہ

اپیل!

عرض ہے کہ گورنمنٹ آف خیبر پختونخواہ کی جانب سے جو لازمی پروموشن کا حکم نامہ جاری ہوا وہ ایک متنازعہ نوٹیفکیشن ہے جس سے ہمیں درج ذیل تحفظات ہیں۔

۱۔ PHST پہلے سے سکیل 15 میں ذمہ داریاں سرانجام دے رہے ہیں اپیل دہندہ کی عمر 48 سال ہے اگر وہ CT پوسٹ لیتا ہے تو سکیل 15 میں ہی آئے گے اور سینارٹی متاثر ہو کر باٹم میں چلے جائیں گے۔ جس کا نقصان یہ ہے کہ وہ SST پوسٹ سے محروم رہ جائیں گے۔

۲۔ یہ جبراً CT پوسٹ لینا ہمیں منظور نہیں کیونکہ ایک سال کے اندر زیادہ تر PHST، SST پوسٹ پر پروموٹ ہونے والے ہیں۔

۳۔ سابقہ حکومت نے پہلے SPST، PHST، PST کو اپ گریڈ کیا جو کہ 01-07-2023 سے نافذ عمل ہے لیکن مالی کمی کی وجہ سے تاحال تاخیر کا شکار ہیں۔

۴۔ یہ کہ سکیل 15 سے سکیل 15 پر جانا کہاں کی پروموشن ہے یہ تو صرف کیڈٹ تبدیل ہو جاتا ہے ہمارا مطالبہ پروموشن اپ گریڈیشن ہے جس میں واضح تبدیلی آجائے گی۔

لہذا ہم استاتذہ حکومت خیبر پختونخواہ سے مطالبہ کرتے ہیں کہ مطلوبہ نوٹیفکیشن کو منسوخ کریں اور استاتذہ کی بے چینی کو ختم کریں۔ ورنہ ہم عدالت جانے میں حق بجانب ہونگے۔

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فخر الدین
Fakhr
GPS پبلک مٹریاں مانسہرہ

کاپی ٹو:-

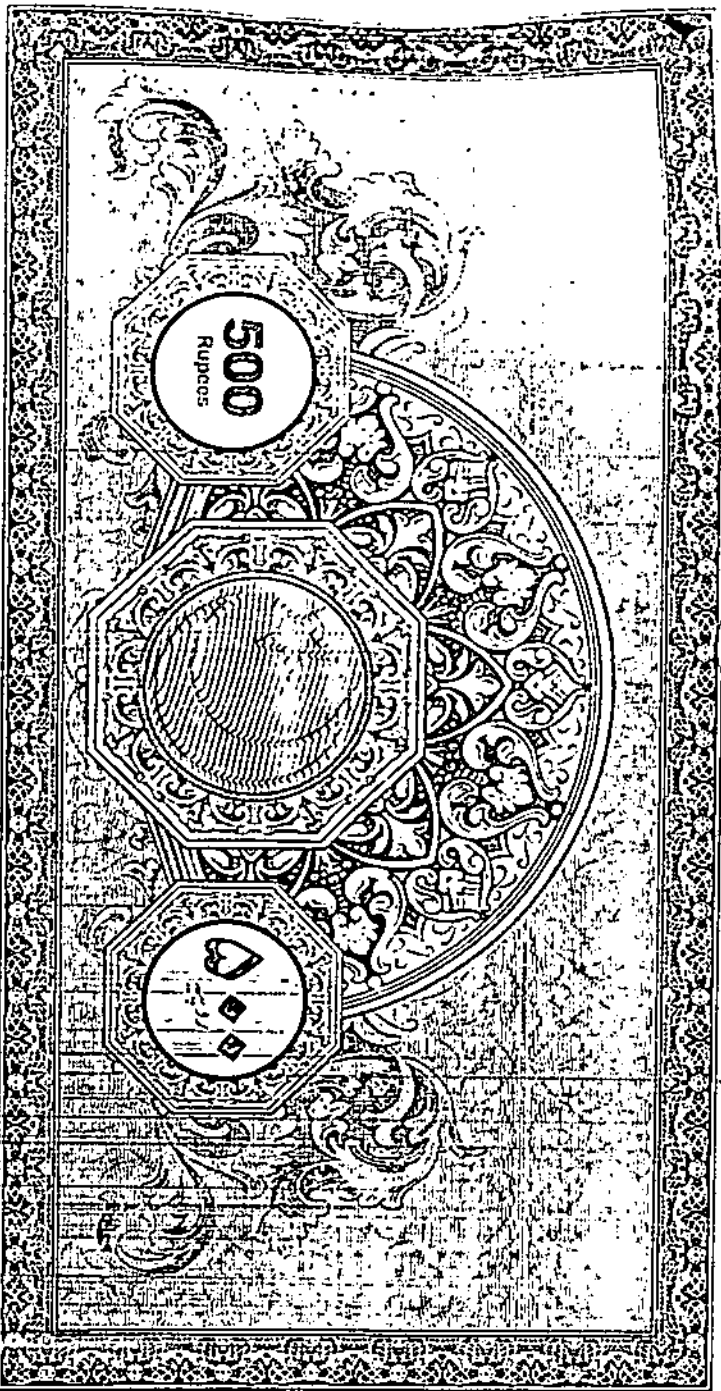
۱۔ جناب سیکرٹری تعلیمات KPK

۲۔ جناب ڈائریکٹر تعلیمات KPK

N.SL No	O.SL No	Name of Present School	Name	Father's Name	BPS	Acad	Div	Prof	D.O.B	Date of Promotion	D/Apptt
463	1969	GPS MANG	AZIZ UR REHMAN	MUHAMMAD FARID	15	MA	2nd	PTC/CT/B.ed	18/03/1972	31-May-17	14/11/1996
464	1971	GPS BATTAL	IBRAR AHMED KHAN	SARFARAZKHAN	15	BA		PTC/CT	13/04/1975	31-May-17	14/11/1996
465	1972	GPS BELA MUTRAIN	FAKHR UD DIN	ABDUL SABOOKH	15	MA		PTC/CT/B.ed/M.ed	05/07/1976	31-May-17	14/11/1996
466	1975	GPS AKHORI BEESA	EJAZ BABAR	REHMAT KHAN	15	BA		PTC/CT	20/12/1971	31-May-17	17/11/1996
467	1976	GPS MALKANA	DIL NAWAZ	MUHAMMAD MISKIN	15	MA		PTC/CT/B.ed	13/08/1975	31-May-17	20/11/1996
468	1979	GPS KAYAN	MUHAMMAD WAHEED	GHULAM SARWAR KHAN	15	BA		PTC/B.Ed	01/03/1974	31-May-17	25/11/1996
469	1980	GPS HOTER	ABDUL RAZZAQ	GHULAM HUSSAIN	15	BA		PTC/B.ed	01/10/1974	31-May-17	25/11/1996
470	1982	GPS JABBAR DHER	MUHAMMAD ARIF	MOHAMMAD SULEMAN	15	MA		PTC/CT/B.ed	05/04/1975	31-May-17	27/11/1996
471	1983	GPS KHUMARIAN	AHMAD NAWAZ	MUHAMMAD AYUB	15	MA		PTC/CT/MA, Edu	01/05/1976	31-May-17	29/11/1996
472	1984	GPS KARMANG PAYEEN	ABDUL HAMID	MUHAMMAD YOUSAF	15	FA		PTC	06/10/1963	31-May-17	30/11/1996
473	1988	GPS GUDWAI JABA	AFZAL AHMAD	M AFZAL	15	BA		PTC/CT/B.ed	01/04/1973	31-May-17	30/11/1996
474	1992	GPS KOT DALBANI	MUHAMMAD BASHARAT	GHULAM RASOOL	15	MA		PTC/CT/B.Ed	02/01/1978	31-May-17	30/11/1996
475	1996	GPS BHUSSA	ZULFIQAR	MUHAMMAD RAFIQ	15	FA		PTC	13/07/1968	31-May-17	01/12/1996
476	2000	GPS BANPHORA	SHAMS UL HAQ	MUHAMMAD JAN	15	MA		PTC/B.ED/M.ED	15/02/1973	31-May-17	01/12/1996
477	2001	GPS PLYANI	MUHAMMAD SHAFIQUE	MUDAT KHAN	15	FA		PTC	01/04/1973	31-May-17	01/12/1996
478	2010	GPS DHAMAN SHARIF	MUHAMMAD SIRAJ	HAFIZ SARFRAZ	15	BA	2nd	PTC/CT/B.ed	13/03/1967	31-May-17	03/12/1996
479	2011	GPS BASALA	MUHAMMAD BASHER	BAZA	15	MA		PTC/B.ED	04/02/1975	31-May-17	03/12/1996
480	2013	GPS SAVER	SHAD MUHAMMAD	ABDUL WAKEEL KHAN	15	FA		PTC	10/02/1973	31-May-17	08/12/1996
481	2016	GPS SHADORE BALA	MUHAMMAD AYAZ	M. ASLAM KHAN	15	BA		PTC	02/02/1971	31-May-17	10/12/1996
482	2019	GPS JAMAL MARI	ZAIN MUHAMMAD	MUHAMMAD BASHIR	15	FA		PTC	25/12/1972	31-May-17	15/12/1996
483	2020	GPS DOONG JARED	DILDAR	SHAH JHAN	15	FA		PTC	13/01/1973	31-May-17	15/12/1996
484	2021	GPS PATTI JARED	PARISTAN	ARABISTAN	15	BA		PTC	01/01/1972	31-May-17	18/12/1996
485	2022	GPS ZAFFAR MAIDAN	IFTIKHAR AHMED	ABDUL RASHEED	15	BA		PTC/CT/B.ed	23/04/1974	31-May-17	18/12/1996
486	2023	GPS LALO BANDI	MUHAMMAD ILYAS	M YOUSAF	15	BA		PTC/CT/B.ED	05/02/1970	31-May-17	31/12/1996
487	2034	GPS CHAPRA BALA	MUHAMMAD NAZEER	SHAMSHER	15	BA		PTC	16/03/1965	31-May-17	13/05/1997
488	2037	GPS BATI ARBORA	GUL MUHAMMAD	GUL REHMAN	15	BA		PTC/B.ed	12/03/1966	31-May-17	13/05/1997
489	2040	GPS LACHI MANG	NIZAKAT HUSSAIN SHAH	SYED HASSAN SHAH	15	FA		PTC	01/01/1967	31-May-17	13/05/1997
490	2043	GPS HOLA	SARDAR HUSSAIN SHAH	NOOR HASSAN SHAH	15	FA		PTC	24/04/1967	31-May-17	13/05/1997
491	2044	GPS KUND BANDA GAYAN	SHAD MUHAMMAD	WALI MUHAMMAD	15	BA		PTC	25/04/1967	31-May-17	13/05/1997
492	2046	GPS MADSERIAN	MUHAMMAD SHAH NAWAZ	BANA KHAN	15	BA		PTC/B.ED	06/01/1968	31-May-17	13/05/1997
493	2049	GPS GUDWAI	NASIR SAEED	MUHAMMAD SAEED	15	FA		PTC	14/04/1968	31-May-17	13/05/1997
494	2050	GPS BAFFA KALAN	SHAHZAD AHMED	MALAK AMAN	15	BA		PTC/B.ed	28/06/1968	31-May-17	13/05/1997
495	2051	GPS DAHARRA BANDA	TAHIR	DOOST MUHAMMAD	15	BA		PTC/CT/B.ed	01/01/1969	31-May-17	13/05/1997

177823

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PAKISTAN COURT FEE

BBAN

2/20/10
J. J. J.

1/1/10

CPB 2nd 8/1/10

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DEAM No. 338

BC No. 10-2457

Name of Advocate طاہر سید

S.No 53745

Fee Rs. 200/-



2024-25
DISTRICT BAR ASSOCIATION
Manshera

وکالت نامہ

بعدالت: سروس ٹریبیونل لیٹاؤر

عنوان: فخر الدین بنام: سیکرٹری آف حکومت KPK

منجاب: ایسٹریٹ لہ نوعیت مقدمہ: سروڈکس ایپل

باعث تحریر آنکہ

دریں مقدمہ عنوان بالا میں اپنی طرف سے برائے پیروی و جواب دی بمقام ایسٹریٹ لہ کے لئے
 طاہر سید جہاںگیر کو وکیل مقرر کیا گیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بوقت پکارے
 جانے وکیل موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ
 میرے خلاف ہو گیا تو وکیل موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل موصوف صدر مقام کچہری کے علاوہ
 کسی اور جگہ کچہری کے مقررہ اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ کچہری کے علاوہ
 کسی اور جگہ سماعت ہوا یا کچہری کے اوقات کے آگے پیچھے سماعت ہونے پر مظہر کو کوئی نقصان پہنچے تو وکیل موصوف ذمہ دار
 نہ ہوں گے اور وکیل موصوف کو عرضی و دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست
 بیان حلفی و تصدیق کرنے اور اسپر دستخط کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراء کرانے اور قسم کا روپیہ وصول
 کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپرد نالشی و راضی نامہ و دستبرداری و اقبال و دعویٰ کا اختیار بھی ہوگا
 بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا کطرفہ درخواست حکم امتناعی یا فیصلہ قبل از ڈگری اجراء ڈگری بھی وکیل موصوف
 کر بشرط ادا ہوگی علیحدہ مختانہ ادا کرنے کا مجاز ہوگا اور بصورت ضرورت بددراں مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا بیرسٹر کو
 بجائے خود یا اپنے ہمراہ مقرر کریں اور مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے وکیل موصوف کو
 اور اگر پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو وکیل موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی حالت
 میں میرا مطالبہ وکیل موصوف کے برخلاف نہیں ہوگا مجھے کل ساختہ پر داختم وکیل موصوف مثل ذات خود منظور و قبول ہوگا۔
 لہذا وکالت نامہ لکھ دیا ہے اور دستخط / انگوٹھا ثبت کر دیا ہے تاکہ سند رہے۔ مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے۔

فخر الدین
 طاہر سید
 طاہر سید جہاںگیر
 طاہر سید

مورخہ 19 اکتوبر 2024ء

طاہر سید

ACCEPTED