


FORM OF ORDER SHEET

Court of _____

Appeal No. **1877** /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  REGISTRAR</p>

S.A # 1877/2024

BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA

Nazeem Ur Rehman.....Appellant

Versus

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

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ADVOCATE

**BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA**

Service Appeal No. 1877/2024

Nacem Ur Rehman son of Aurangzeb PSHT (BPS-15) at
CPS Pocher Mera, Manshra | Date of Appointment
03.06.1992.....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.**

PRAYER:

**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 Sheweth!

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

2) That, 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

given retrospective effect of valid notification which confer rights is always applicable with prospective effect, however, if an amendment notification that adversely effects the interests of the employees or causes disadvantages to the employee is not tenable in the eyes of law. The notification/guidance dated 06.08.2020, 06.06.2023 are liable to be set-aside.

- B) That, there are no terms and conditions of service mentioned in the appointment order of the appellant wherein, availing of promotion is mandatory. It is further submitted that employee in the past, have foregone their promotion along with their posting. It is submitted that when domestic and other personal issues do not permit the employees/appellant to avail the promotion order and in that case, the employees who foregone their promotion were allowed not to avail the promotion for a period of 04 years and on second refusal the employee were permanently debarred from availing the facility of promotion during their entire services. Hence, the employees himself forebear agonies of foregoing their promotions. As a result, junior to the appellant according to the order of seniority cum fitness are granted promotion to next rank.
- C) That, as per civil servant laws, promotion is a kind of appointment which is always optional to get promotion or not, hence the impugned notification is void, illegal and against the law and the same to the extent of the appellant is liable to set-aside.
- D) That, it is further submitted that on account of grant of promotion some employees who are suffering from several 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 his promotion it must be optional for the employee as to whether to avail or forego to benefit. Any promotion without willingness of employee is illegal and liable to be set-aside.
- E) 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 from promotion could be promoted.
- F) That, the impugned promotion notification dated 06.08.2020 communicated on 06.06.2023 is perverse, discriminatory, against the law, pungent and is a blunt blow of hammer on the rights of the appellant. It is not out of place to mention here that the appellant are teachers and have to look after their childrens as well as ailing dependent family members and in these circumstances in the presence of impugned notification dated 06.08.2023 communicated on 06.06.2023 would not be able to serve in the Department and which shall amount to the snatching of bread and butter of the poor employees.

(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.

N. Sajid
Appellant

Through: -

Tahir Sajid

Tahir Sajid Advocate
High Court, District
Courts, Mansehra

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.

N. Sajid

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

Naeem Ur Rehman.....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.

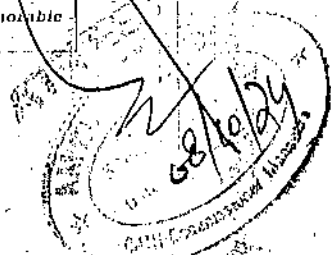
Appellant

Through: -

Tahir Sajid Advocate
High Court, District
Courts, Mansehra

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.

Naeem



OFFICE OF THE DISTRICT EDUCATION OFFICER (MTE) MAHARASHTRA.

Office Order No. 69

Dated. 28.09/1986.

POINTMENT.

On return from the training, following candidates are hereby appointed against P.T. posts at the school noted against their names @ Rs. 560/- (BPS-7) plus usual allowances as admissible under the rules in the interest of public service w.e.f. the date their taking over charge. No. Name with Father's Name, Residence, School where appointed. Remarks

18	..do..	Kotkay.	GPS Sandasar.	Against post.	Zaid Ishaq s/o Mond Ishaq.
17	..do..	Dadar.	Tarkamal	..do..	Mond Saad s/o Mond Yousuf.
16	..do..	Ochri.	Sindhu Bela	..do..	Kurshid Ahmed s/o Wajid Rehman.
15	..do..	Mangloor.	GMS Thekra.	..do..	Mond Azim s/o Mond Kurshid.
14	..do..	Labarkot.	GPS Kalgan	..do..	Taj Mond.
13	..do..	Dhodol.	Surbanj.	..do..	Mond Miskin s/o All Gul.
12	..do..	Mangloor.	Chakal.	..do..	Iftikhar Ahmed s/o Shamail Gul.
11	..do..	Prangri Bela	Murat Mera	..do..	Iftikhar Ahmed s/o Mond Ijaz s/o Mond Farid.
10	..do..	Behali.	Bandi Gulu	..do..	Ishfaq Hussain s/o Mond Latif.
9	..do..	Paran.	Katha Bela	..do..	Saleh Khan. Sali Mond Khan. Iftikhar Ahmed s/o Mond Latif.
8	..do..	Mangloor.	Chakal.	..do..	Gul Rehman. Gul Dastm s/o Mond Ishaq.
7	..do..	Prangri Bela	Murat Mera	..do..	Mond Hussain. Mond Ishaq s/o Mond Ishaq.
6	..do..	Dhodol.	Surbanj.	..do..	Iftikhar Ahmed s/o Mond Ishaq.
5	..do..	Labarkot.	GPS Kalgan	..do..	Mond Ishaq s/o Mond Ishaq.
4	..do..	Mangloor.	GMS Thekra.	..do..	Mond Ishaq s/o Mond Ishaq.
3	..do..	Labarkot.	GPS Kalgan	..do..	Mond Ishaq s/o Mond Ishaq.
2	..do..	Prangri Bela	Murat Mera	..do..	Mond Ishaq s/o Mond Ishaq.
1	..do..	Dhodol.	Surbanj.	..do..	Mond Ishaq s/o Mond Ishaq.

ANN: A

(Signature)

S.No. Name with Father's Name. Residence. School where Remarks.

24.	Mohd Huz s/o	Baran	Agg post
25.	Shafiqur Rehman s/o	Baran	Mosq: ch: Baran. V/Post.
26.	Amir Ali Shah s/o	Baran	Agg post
27.	Abdul Latif Shah	Baran	Agg post
28.	Mohd Hoshan Din s/o	Baran	Agg post
29.	Amir Ali Shah s/o	Baran	Agg post
30.	Ittihar Ahmed s/o	Baran	Agg post
31.	Abdul Jamil s/o	Baran	Agg post
32.	Abdul Hamid	Baran	Agg post
33.	Mohd Irfaan	Baran	Agg post
34.	Habibur Rehman s/o	Baran	Agg post
35.	Samundar Khan	Baran	Agg post
36.	Raeed Din s/o Haster	Baran	Agg post
37.	Saeed Din	Baran	Agg post
38.	Khalid Farooq s/o	Baran	Agg post
39.	Mohd Huz	Baran	Agg post
40.	S. Imam Ali Shah s/o	Baran	Agg post
41.	Shabir Ali Shah	Baran	Agg post
42.	Imjad s/o Vallur	Baran	Agg post
43.	Rehman	Baran	Agg post
44.	Sabir Hussain s/o	Baran	Agg post
45.	Shor Zaman	Baran	Agg post
46.	Ittihar Baqir s/o	Baran	Agg post
47.	Baqirul Haq	Baran	Agg post
48.	Neemur Rehman s/o	Baran	Agg post
49.	Ali Hader s/o	Baran	Agg post
50.	Malik Aman	Baran	Agg post
51.	Ittihar Hussain Shah	Baran	Agg post
52.	Mubarak Shah	Baran	Agg post
53.	Imjad Hussain Shah	Baran	Agg post
54.	Imjad Hussain Shah	Baran	Agg post
55.	Munawar Shah	Baran	Agg post
56.	Munawar Hussain s/o	Baran	Agg post
57.	Mohd Jan	Baran	Agg post
58.	Shaukat Hayat s/o	Baran	Agg post
59.	Dilwar Khan	Baran	Agg post
60.	Mohd Hafiq s/o	Baran	Agg post
61.	Khan Bahadar	Baran	Agg post
62.	Tahirul Islam s/o	Baran	Agg post
63.	Mohd Khan	Baran	Agg post
64.	Dilwar Khan s/o	Baran	Agg post
65.	Berab Khan	Baran	Agg post
66.	Sahbazda Mohd Shoaib	Baran	Agg post
67.	Mohd Aftab	Baran	Agg post
68.	Mohd Aftab s/o	Baran	Agg post
69.	Rehmanullah	Baran	Agg post
70.	Mohd Baqir s/o	Baran	Agg post
71.	Harra Doga	Baran	Agg post
72.	Chandan	Baran	Agg post
73.	Bandi Seeb	Baran	Agg post
74.	Sehit Bala (NCP)	Baran	Agg post
75.	Lassan Mohandaz	Baran	Agg post
76.	M.M. Polio	Baran	Agg post
77.	GPS Lemat	Baran	Agg post
78.	GMS Jalgaon	Baran	Agg post
79.	Kanooh	Baran	Agg post
80.	Kotla Siran	Baran	Agg post
81.	Kotla Darwaz	Baran	Agg post
82.	Senkibala	Baran	Agg post
83.	Belton	Baran	Agg post
84.	Baran	Baran	Agg post
85.	Baran	Baran	Agg post
86.	Baran	Baran	Agg post
87.	Baran	Baran	Agg post
88.	Baran	Baran	Agg post
89.	Baran	Baran	Agg post
90.	Baran	Baran	Agg post
91.	Baran	Baran	Agg post
92.	Baran	Baran	Agg post
93.	Baran	Baran	Agg post
94.	Baran	Baran	Agg post
95.	Baran	Baran	Agg post
96.	Baran	Baran	Agg post
97.	Baran	Baran	Agg post
98.	Baran	Baran	Agg post
99.	Baran	Baran	Agg post
100.	Baran	Baran	Agg post

1. Hameed s/o	Chatoor.	Chela Gulibagh. CPS Saryala.	Age:V/post.
2. Khalid s/o	s Khan.	Inayat Abad.	" Garhi. ..do..
3. Tamez s/o	Yaqoob.	ajna.	" Kharyala. ..do..
4. Rehman s/o	Kur Rehman.	Sh:Kajaf Khan.	" Koh. (H.C.P).
5. Ahmed Khan s/o	Khan Haidar.	Korh.	" Lachi Mang. Ag:V/Post.
6. Saeed Akhtar s/o	Younis.	Trangri-	" Lassan
7. Asif s/o	Manan.	-ala.	Hawab. ("C.P).
8. Asghar s/o	Muhammad Khaliq.	Granthali.	" Banjo. ..g:V/Post.
9. Muzdur Rehman s/o	Aliyar Rehman.	Sahir Shah.	" Ghamian Seri ..do..
10. Mans Parooq s/o	Muhammad Jabbar.	G. I. Ullah.	" Zamiri ..do..
11. Abdur Razzaq s/o	Sarfraz Hussain.	Posha (Ex- service man).	" Tanoo- Khana. ..do..
12. Abdur Razzaq s/o	Sarfraz Hussain.	Gurran.	" Chota- Facen. ..do..

TERMS AND CONDITIONS.

1. Charge reports should be submitted to all concerned.
2. No DA/DA & T.G. is allowed to any one.
3. They should produce their Age & Health certificate from Medical Supdt: DMQ Hospital Mansehra.
4. Their appointment is purely temporary and liable to termination at any time without any reason and notice.
5. Their original qualification/professional certificates should be checked before handing over charge.
6. They should not be handed over charge if their age is below 18 years and above 25 years.
7. PTC failed candidates will get Rs. 560/- PM (Fixed).
8. Un-authorized appointments/adjustments made by SDEO are hereby cancelled with immediate effect.

(GUL BAR KHAN)
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA.

Endst: No. 15000-15123/

Dated Mansehra the 28.9/1986.

1. Copy forwarded for information and necessary action to the:
 - 2-63. Sub-Divisional Education Officer (Male) Mansehra.
 - 63-125. Headmaster/Head Teacher GMS/GIS/Mosq: school concerned.
 - 63-125. Candidates concerned;
 126. Office order file.

DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA.

(7A)

AMT

PA



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

Personal Information of Mr NAEEM UR REHMAN d/w/s of AURANG ZEB

Personnel Number: 00218140 CNK: 1350319011575 NTN:
Date of Birth: 10.06.1968 Entry into Govt. Service: 29.09.1987 Length of Service: 36 Years 11 Months 004 Days

Employment Category: Active Temporary

Designation: PRIMARY SCHOOL HEAD TEACH 80003206-DISTRICT GOVERNMENT KHYBE

DDO Code: MA6145-Manshira

Payroll Section: 001

GPF Section: 001

Cash Center: 4

GPF A/C No:

GPF Interest applied

GPF Balance:

731,051.00 (provisional)

Vendor Number:

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 15

Pay Stage: 25

Wage type	Amount	Wage type	Amount
0001 Basic Pay	73,420.00	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	985.00
2199 Adhoc Relief Allow @ 10%	659.00	2316 Teaching Allowance 2021	3,224.00
2341 Dispr. Rel All 15% 2022KP	7,006.00	2347 Adhoc Rel Al 15% 22(PS17)	7,007.00
2378 Adhoc Relief All 2023 35%	25,004.00	2393 Adhoc Relief All 2024 25%	18,355.00

Deductions - General

Wage type	Amount	Wage type	Amount
3015 GPF Subscription	-4,290.00	3501 Benevolent Fund	-1,200.00
3609 Income Tax	-6,778.00	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
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Deductions - Income Tax

Payable: 108,444.60 Recovered till AUG-2024: 13,556.00 Exempted: 27110.90 Recoverable: 67,777.70

Gross Pay (Rs.): 143,580.00 Deductions: (Rs.): -13,003.00 Net Pay: (Rs.): 130,577.00

Payee Name: NAEEM UR REHMAN

Account Number: PL51849-9

Bank Details: NATIONAL BANK OF PAKISTAN, 231338 KILAWAJGAN KILAWAJGAN, MANSEHRA

Leaves:

Opening Balance:

Availed:

Earned:

Balance:

Permanent Address: MANSEHRA

City: MANSEHRA

Domicile: NW - Khyber-Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: naeemrpsht@gmail.com

Alleged

DEPUTY SECRETARY (POLICY)
(WALIDAH LATIF)

[Handwritten signature]



- The Director, Administration Department.
- The Section Officer (Admn), Administration Department.
- All Deputy Secretaries in Establishment & Administration Department with the request to arrange 20 generic copies.
- The Deputy Director (IT), EA Department.
- The Registrar, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
- The Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
- All Deputy Commissioners in Khyber Pakhtunkhwa.
- All Autonomous Semi Autonomous Bodies in Khyber Pakhtunkhwa.
- All Heads of Attached Departments in Khyber Pakhtunkhwa.
- All Divisional Commissioners in Khyber Pakhtunkhwa.
- The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
- All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
- The Senior Member Board of Revenue, Khyber Pakhtunkhwa.
- Development Department.
- Additional Chief Secretary, Govt. of Khyber Pakhtunkhwa, Planning &

CHIEF SECRETARY
GOVERNMENT OF THE KHYBER PAKHTUNKHWA

AMENDMENT

In exercise of the powers conferred by section 25 of the Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973) the Minister of Khyber Pakhtunkhwa is pleased to direct that in the Khyber Pakhtunkhwa (Appointments, Promotion and Transfer) Rules, 1989, the following amendments shall be made, namely:

Dated Peshawar, the 06/12/2010

NOTIFICATION

GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(REGULATION WING)

B 8

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 XVIII) the chief Minister of Khyber Pakhtunkhwa is pleased to direct that in the Khyber Pakhtunkhwa Civil Servants (Appointment Promotion and Transfer) Rules 1989, the following further amendment shall be made, namely:

AMENDMENT

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

CHIEF SECRETARY
GOVERNMENT OF THE KHYBER PAKHTUNKHWA

(ANDS): & EVEN DATE

Copy is forwarded to :-

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

(WAJDAH LATIF)
DEPUTY SECRETARY (POLICY)

Attested
Dy. Secy

ANNEXURE

C
10



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
No. SO(Polcy)16431/2020
Dated Peshawar the June 06, 2023

62

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

Subject: GUIDANCE REGARDING DELETION OF RULE 7(3) IN THE
KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT,
PROMOTION AND TRANSFER) RULES, 1989.

Dear Sir,
I am directed in refer to your letter No. SO(Polcy-M)16431/2020-2/Appointment/2023 dated 18.04.2023 on the subject noted above and to state that Sub-Rule (3) of Rule-7 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 stands deleted vide this departmental 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 sticking to a single lucrative post/position or to prevent those who tend to forgo promotion to evade posting/transfer or show lack of capacity to tackle higher responsibilities in case of promotion. Therefore, it is obligatory upon every civil servant to accept promotion in every condition.

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

Yours faithfully,

(Issa Nadeem Khan)
Secretary (Polcy)

ASE
7/6

Recd. Of even No & date

Copy forwarded to:-

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

Deputy Secretary (Policy)

Sc/...

7.1.8.23

Attest

D
①

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
CIVIL SECRETARIAT PESHAWAR
(Phone No.091-9223507)

No. SO (Primary-M)/E&SED/2-6/2023
Dated Peshawar lho. 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, 1969.

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 26th 2023

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

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

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

I am directed to refer to the subject noted above and to enclose here with a letter of Establishment Department letter No. SO (Policy)E&AD/1-3/2020 dated 06 June, 2023 and to state that the subject meeting is to be held on 06 July, 2023 at 11:00 AM in this department under the Chairmanship of Additional Secretary (Estal) 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 CP PG43

Attested
A. B.

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. Razaqat Ullah	General Secretary APTA Peshawar
4	Muhammad Ishaq	Section Officer (Primary) E&SE Department Civil Secretariat Khyber Pakhtunkhwa Peshawar


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

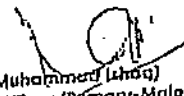
3. After thorough discussion it was decided that Directorate of Elementary & Secondary Education Department may examine the case properly and submit a self-contained/consolidated case for onward submission to Establishment Department for further necessary action.

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


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

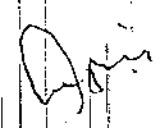

(Mr. Aziz Ullah)
Provincial President
All Primary Teachers Association
Khyber Pakhtunkhwa



(Mr. Razaqat Ullah)
General Secretary APTA
Peshawar


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

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

WP/447-2023 AZIZULLAH VS GOVT CF P043

Attested




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/1	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-3
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)

Ali Aslam
Apt

ANNEXURE

E



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

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

2. In this connection it is submitted that in some cases lady teacher of primary level who 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.

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

(MUHAMMAD ISHAQ)
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

(Signature)
SECTION OFFICER (PRIMARY MALE)
28/8/23

Scanned with CamScanner

WP4442-2023 AZIZULLAH VS GOVT OF PG43

Attest

(Signature)

16

- B/c - - 2 -

No. 50 (Primary - M) E&SEED / 2-2 /
Appointment - Rule / 2023
Peshawar Dated 23rd August, 2023.

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

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

Dear Sir,

I am directed to refer to your letter No. 50 (Primary) / E&AD / 1-3 / 2023 dated 31st June 2023 and to state that after deletion of Rule 7(S) Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and Transfer Rules 1989) it has been intimated that those officers/officials who do not comply with promotion order of the competent authority or try to evade promotion through different means shall be proceed under Khyber Pakhtunkhwa Civil Servant (Efficiency and Discipline) Rule 2011.

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

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

Copy forwarded to;

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

(Muhammad Ishaq)
Section Officer (Primary
Male)

AM est
Aji



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
No. SO(Policy)E&AD/1-3/2023
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-MVE&SED/2-
2/Appointment-Rule/2023 dated 23.08.2023 on the subject noted above and to state that
necessary guidance has already been rendered to your good office vide this department letter of
even No. dated 06.06.2023 (copy enclosed).

Yours faithfully,

Section Officer (Policy)

Endst. Of even No & date

Copy forwarded to the:-

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

(17)

F

Handwritten signature and initials

VP-443-2023 AZIZULLAH VS GOVT OF PK

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)

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.

Section officer (Policy)

Attested
[Signature]

- B/c -

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION, KPK

PESHAWAR
(21-7-2023)

To:

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

Subject: Minutes of Meeting

Dear Sir;

I am directed to refer to letter No. (SO Primary-M) E&SED/S-1/G/M/Min/ Minutes of meeting/PST/2023 dated 10-7-2023 on subject cited above and to present brief history, about background of case as under:

- That Government of KP Establishment department (Regulation Wing) deleted rule 7(S) in Civil Servants (Appointment, promotion, Transfer Rule 1997) vide notification No. No. SOP-VI (E&AD) 1-3/2020 dated 06-08-2020.
- That this office sought guidance from your good office in the following words vide letter No. 6987 dated 06-07-2023
 - (i) Now it is obligatory upon civil servant to accept promotion.
 - (ii) It is prerogative of civil servant to either accept/discard the offer of promotion.
- That your good office forwarded the same to quarters concerned vide letter No. SO (Primary-M) E&SED/2-2/Appointment-2023 for necessary guidance.
- That the government of KP-ED (Regulation Wing) vide letter No. SO (Policy) E&AD(1-3)/2020 dated 6-06-2020 categorically stated that there exists no provision to decline /forgo promotion. It is obligatory upon every civil servant to accept promotion under every condition.
- That in light of the minutes of the meeting dated 6-07-2023 held under the Chairmanship of Hon. Additional Secretary Establishment at his office. This office has been asked for submission of consolidated case.

In view of the above, this office is of considered opinion that the deletion of Rules 7(S) have affected negatively a huge members of Female teachers.

The case is submitted for perusal and necessary action please.

Copy of the above to;

1. PA to Director Local Directorate
2. Master Copy

Assistant Director
Elementary & Secondary Education
Khyber Pakhtunkhwa.

A Hestert
D. J. J.

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

WP4492-2023 AZIZULLAH VS GOVT OF PAK

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

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

Assistant Director (Exhibit-1)
Elementary & Secondary Education
Khyber Pakhtunkhwa
Date: 21/7/2023

The case is submitted for perusal and necessary actions please.

The case is submitted for perusal and necessary actions please. Departmental Promotion Committee. Teachers below 175-16 may be exempted of implications of the amendment in the rules held 7(2) have effected negatively a huge numbers of Female Teachers. Thus it is proposed that in view of the above, this office is of considered opinion that the selection of Rules been asked for withdrawal of consolidated case. Chairmanship of Hon. Additional Secretary Establishment at his office this office has. That, in the light of the minutes of meeting dated 6-07-2023 held under the (Primary-4) E&SED/2-1/19/2023 dated 17-06-2023. The same was received by this office from your good office with letter No.50 civil servant to accept promotion under every condition. That those extra no provision in decline or forgo promotion. It is obligatory upon every wing) vide letter No.50 (Policy) E&AD/1-3/2020 dated 6-06-2023 categorically stand that the Government of Khyber Pakhtunkhwa Establishment Department (Regulation No.50 (Primary-4) E&SED/2-1/19/2023 for necessary guidance. That your good 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 promotion. (iii) Now it is obligatory upon the civil servant to accept promotion in every condition. No.5087 dated 06-02-2023. That this office sought guidance from your good office in the following words vide letter wide notification No. 508-11 (E&AD)/1-3/2020 dated 06-08-2020. That Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) dated Rule 7(2) in the Civil Servants (Appointment, Promotion & Transfer Rules 1975) present brief history about the background of the case as under:

Subject: - MINUTES OF THE MEETING
Dear Sir,
The Sub-Director (Primary-Male),
Elementary & Secondary Education Department,
Khyber Pakhtunkhwa Government.

Khyber Pakhtunkhwa, Peshawar
Date: 21-7-2023
Phone: 091-923344
Email: estab@khyberinfo.gov.pk



20

بخدمت جناب سیکرٹری تعلیم خیبر پختونخوا

اپیل!

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

(۱) PSHT پہلے سے سکیل 15 میں ذمہ داریاں سہرا انجام دے رہے ہیں۔ اپیل دہندہ کی عمر 5 سال ہے اگر وہ سٹی پوسٹ لینا چاہے تو سکیل 15 میں ہی آئیں گے اور سینارٹی متاثر ہو کر بارٹم میں چلے جائیں گے جس کا نقصان یہ ہے کہ وہ SST پوسٹ سے محروم رہ جائیں گے۔

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

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

(۴) یہ کہ سکیل 15 سے سکیل 15 میں جانا کہاں کا پرموشن ہے یہ تو صرف کیڈر تبدیل ہو جاتا ہے اور ہمارا مطالبہ پرموشن اپ گریڈیشن ہے جس میں واضح تبدیلی آجائے گی۔

لہذا ہم استاذہ حکومت خیبر پختونخواہ سے مطالبہ کرتے ہیں کہ مذکورہ نوٹیفیکیشن کو منسوخ کریں اور استاذہ کی بے چینی کو ختم کریں۔ ورنہ ہم عدالت جانے میں حق با جانب ہوں گے۔

۲۶

نعم الرطان PSHT



Chips لکھ میرا

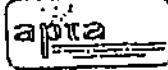
کاپی ٹو!

(۱) جناب سیکرٹری تعلیمات KPK

(۲) جناب ڈائریکٹر تعلیمات KPK

H
22

Khyber Pakhtunkhwa



APTA House
Govt. Primary School No.4,
Gujbarwala, Faisalabad City.

Aziz Ullah Khan
Proprietor
0333-9414610
azizullah19073@gmail.com
01 nptnepk

آل پرائمری ٹیچرز ایسوسی ایشن (اپٹا) خیبر پختونخوا

Annexure - H

محکمہ تعلیم و ترقی خیبر پختونخوا
آل پرائمری ٹیچرز ایسوسی ایشن خیبر پختونخوا
خیبر پختونخوا

گزارش ہے کہ پروڈکشن برائے سال 2022-23 کے سرکاری اسکولوں کی فہرستوں میں سے پروڈکشن ایک سال سے زیادہ کے لئے جو عام ایک اگر کسی
 بچہ کے لئے ایک سال سے زیادہ کے لئے 2022-23 کے لئے پروڈکشن میں سے ایک سال سے زیادہ کے لئے پروڈکشن میں سے ایک سال سے زیادہ کے لئے
 ہر اس سال میں سرکاری اسکولوں کی فہرستوں میں سے ایک سال سے زیادہ کے لئے پروڈکشن میں سے ایک سال سے زیادہ کے لئے
 اس کے ساتھ ساتھ ہر عام پروڈکشن میں سے ایک سال سے زیادہ کے لئے پروڈکشن میں سے ایک سال سے زیادہ کے لئے
 حاصل یہ آئی ہے لیکن ایسی حالتوں کی حالتوں میں سے ایک سال سے زیادہ کے لئے پروڈکشن میں سے ایک سال سے زیادہ کے لئے
 تاکہ عام حالت میں سے ایک سال سے زیادہ کے لئے پروڈکشن میں سے ایک سال سے زیادہ کے لئے پروڈکشن میں سے ایک سال سے زیادہ کے لئے
 کیا اس کے لئے حالتوں میں سے ایک سال سے زیادہ کے لئے پروڈکشن میں سے ایک سال سے زیادہ کے لئے پروڈکشن میں سے ایک سال سے زیادہ کے لئے
 پروڈکشن میں سے ایک سال سے زیادہ کے لئے پروڈکشن میں سے ایک سال سے زیادہ کے لئے پروڈکشن میں سے ایک سال سے زیادہ کے لئے
 اور پروڈکشن میں سے ایک سال سے زیادہ کے لئے پروڈکشن میں سے ایک سال سے زیادہ کے لئے پروڈکشن میں سے ایک سال سے زیادہ کے لئے
 اس کے ساتھ ساتھ ایک سال سے زیادہ کے لئے پروڈکشن میں سے ایک سال سے زیادہ کے لئے پروڈکشن میں سے ایک سال سے زیادہ کے لئے
 تاکہ پروڈکشن میں سے ایک سال سے زیادہ کے لئے پروڈکشن میں سے ایک سال سے زیادہ کے لئے پروڈکشن میں سے ایک سال سے زیادہ کے لئے
 پروڈکشن میں سے ایک سال سے زیادہ کے لئے پروڈکشن میں سے ایک سال سے زیادہ کے لئے پروڈکشن میں سے ایک سال سے زیادہ کے لئے

عمر
 آل پرائمری ٹیچرز ایسوسی ایشن خیبر پختونخوا
 88/77/83

APTA

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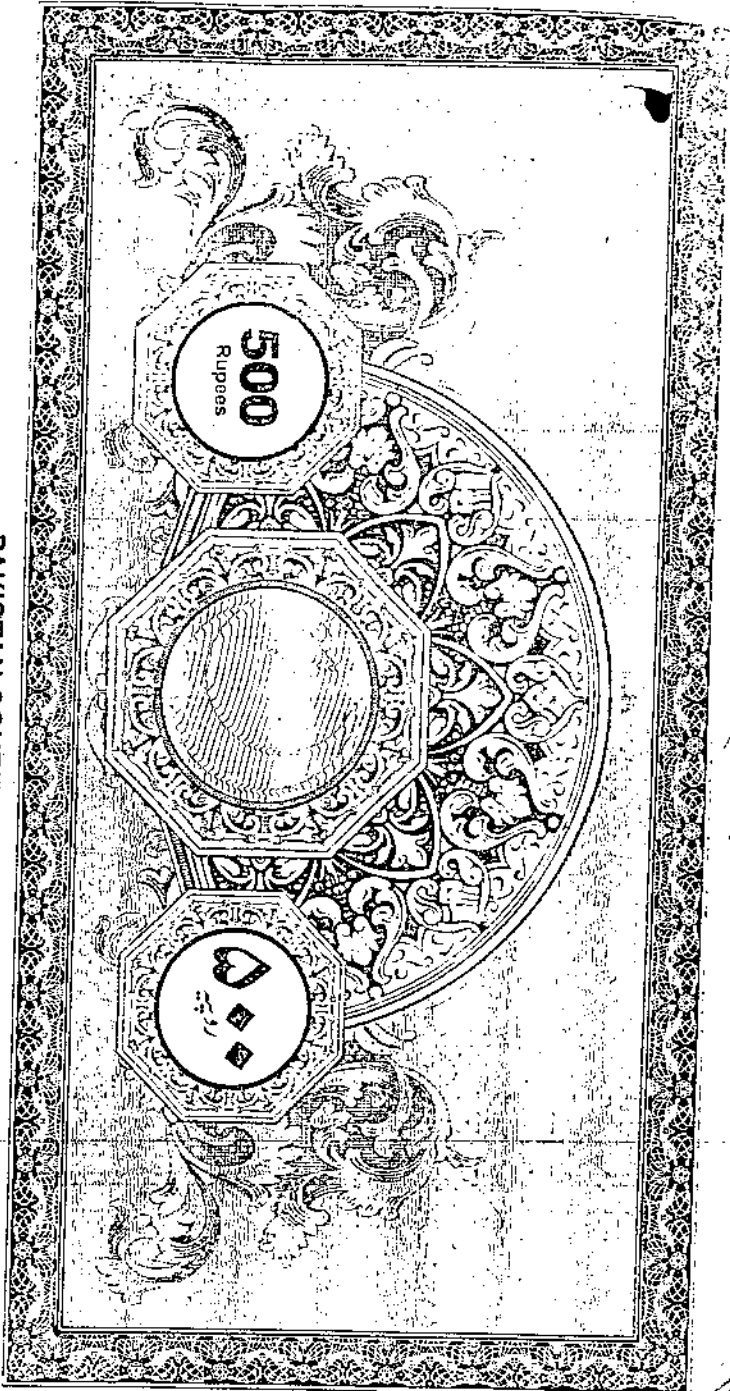
ANNEXURE
R I 2

OFFICE OF THE DISTRICT MILITARY OFFICER (MALE) MANSEIRA

NEARBY LIST OF PSHY'S DISTRICT (MALE) MANSEIRA

Sl. No.	Name of Person (short)	Rank	Post	Rate	Age	Religion	Family Name	Address	Post	Rate	Age	Religion	Family Name	Address	Post	Rate	Age	Religion	Family Name	Address
1	CPT SANKAR SINGH	PT	PT	7	24	H	SHANKAR SINGH	...	PT	7	24	H	SHANKAR SINGH	...	PT	7	24	H	SHANKAR SINGH	...
2	CPT SANKAR SINGH	PT	PT	12	24	H	SHANKAR SINGH	...	PT	12	24	H	SHANKAR SINGH	...	PT	12	24	H	SHANKAR SINGH	...
3	CPT SANKAR SINGH	PT	PT	17	24	H	SHANKAR SINGH	...	PT	17	24	H	SHANKAR SINGH	...	PT	17	24	H	SHANKAR SINGH	...
4	CPT SANKAR SINGH	PT	PT	22	24	H	SHANKAR SINGH	...	PT	22	24	H	SHANKAR SINGH	...	PT	22	24	H	SHANKAR SINGH	...
5	CPT SANKAR SINGH	PT	PT	27	24	H	SHANKAR SINGH	...	PT	27	24	H	SHANKAR SINGH	...	PT	27	24	H	SHANKAR SINGH	...
6	CPT SANKAR SINGH	PT	PT	32	24	H	SHANKAR SINGH	...	PT	32	24	H	SHANKAR SINGH	...	PT	32	24	H	SHANKAR SINGH	...
7	CPT SANKAR SINGH	PT	PT	37	24	H	SHANKAR SINGH	...	PT	37	24	H	SHANKAR SINGH	...	PT	37	24	H	SHANKAR SINGH	...
8	CPT SANKAR SINGH	PT	PT	42	24	H	SHANKAR SINGH	...	PT	42	24	H	SHANKAR SINGH	...	PT	42	24	H	SHANKAR SINGH	...
9	CPT SANKAR SINGH	PT	PT	47	24	H	SHANKAR SINGH	...	PT	47	24	H	SHANKAR SINGH	...	PT	47	24	H	SHANKAR SINGH	...
10	CPT SANKAR SINGH	PT	PT	52	24	H	SHANKAR SINGH	...	PT	52	24	H	SHANKAR SINGH	...	PT	52	24	H	SHANKAR SINGH	...
11	CPT SANKAR SINGH	PT	PT	57	24	H	SHANKAR SINGH	...	PT	57	24	H	SHANKAR SINGH	...	PT	57	24	H	SHANKAR SINGH	...
12	CPT SANKAR SINGH	PT	PT	62	24	H	SHANKAR SINGH	...	PT	62	24	H	SHANKAR SINGH	...	PT	62	24	H	SHANKAR SINGH	...
13	CPT SANKAR SINGH	PT	PT	67	24	H	SHANKAR SINGH	...	PT	67	24	H	SHANKAR SINGH	...	PT	67	24	H	SHANKAR SINGH	...
14	CPT SANKAR SINGH	PT	PT	72	24	H	SHANKAR SINGH	...	PT	72	24	H	SHANKAR SINGH	...	PT	72	24	H	SHANKAR SINGH	...
15	CPT SANKAR SINGH	PT	PT	77	24	H	SHANKAR SINGH	...	PT	77	24	H	SHANKAR SINGH	...	PT	77	24	H	SHANKAR SINGH	...
16	CPT SANKAR SINGH	PT	PT	82	24	H	SHANKAR SINGH	...	PT	82	24	H	SHANKAR SINGH	...	PT	82	24	H	SHANKAR SINGH	...
17	CPT SANKAR SINGH	PT	PT	87	24	H	SHANKAR SINGH	...	PT	87	24	H	SHANKAR SINGH	...	PT	87	24	H	SHANKAR SINGH	...
18	CPT SANKAR SINGH	PT	PT	92	24	H	SHANKAR SINGH	...	PT	92	24	H	SHANKAR SINGH	...	PT	92	24	H	SHANKAR SINGH	...
19	CPT SANKAR SINGH	PT	PT	97	24	H	SHANKAR SINGH	...	PT	97	24	H	SHANKAR SINGH	...	PT	97	24	H	SHANKAR SINGH	...
20	CPT SANKAR SINGH	PT	PT	102	24	H	SHANKAR SINGH	...	PT	102	24	H	SHANKAR SINGH	...	PT	102	24	H	SHANKAR SINGH	...

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S.No

Fee Rs. 200/-



GENERAL SECRETARY
District Bar Association
Manshera

وکالت نامہ

DB No.

338

BC No.

10-2457

Name of Advocate

قائم سید

بعدالت: سروس ٹریسٹوں کی کاپی لیا اور
 عنوان: لغیم الرحمان
 منجانب: ارسلان
 نوعیت مقدمہ: سروس ٹریسٹ

باعث تحریر آنکہ

دریں مقدمہ عنوان بالا میں اپنی طرف سے برائے پیروی و جواب دہی بمقام کے لئے

طاہر ساجد ریلوے ڈپو کورٹ

کو بدیں شرائط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں 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 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 کاروبہ وصول

کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپر دائی و رضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار بھی ہوگا

بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا فیصلہ قبل از ڈگری اجراء ڈگری بھی وکیل موصوف

کر بشرط ادائیگی علیحدہ محنتانہ ادا کرنے کا مجاز ہوگا اور بصورت ضرورت بدوراں مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا ایئر سٹرو 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۔

مورخہ 19 اکتوبر 2024ء

قائم سید

ACCEPTED

لغیم الرحمان وکالت نامہ
 کمنہ پورہ صدر ماہی پورہ
 ارسلان