


# FORM OF ORDER SHEET

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

Appeal No. 1881 /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 # 1881/2024

**BEFORE THE SERVICE TRIBUNAL**  
**KHYBER PAKHTUNKHWA**

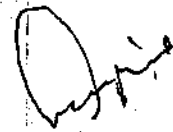
Iffikhar Ahmed.....Appellant

Versus

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

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ADVOCATE

(1)

**BEFORE THE SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA**

**Service Appeal No. 1881 /2024**

Hikhar Ahmed son of Abdul Rasheed PSHT (BPS 15) at  
CPS Zaffar Maidan Bela Akbar Khan, Mansohra 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.**

**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 06<sup>th</sup>, 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

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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.*

  
Appellant


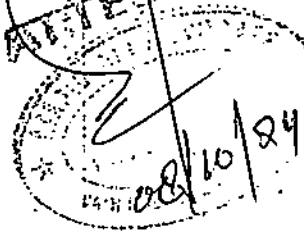
Through:-



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.



  
**ACCEPTED**  


6

**BEFORE THE SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA**

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

Iftikhar Ahmed.....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.

Ie

**ATTESTED**  
Tahir Sajid Advocate  
High Court District  
Courts, Mansehra

**ATTESTED**  
Tahir Sajid Advocate  
High Court District  
Courts, Mansehra



original ANNEXURE

OFFICE OF THE DISTRICT MAGISTRAR

APPOINTMENT

Consequent upon the following PTC trained candidates mentioned against each in the usual allowances as admissible from the date of their taking over...

S.NO.	Name & Father's Name	Post	Station	Remarks
1	Rafique Hussain S/O Abdur Rehman	Sub-Inspector	GRS Sheer Halli	A/V/P
2	Lugman S/O Muhammad Nisbeen	Sub-Inspector	GPS Bela Tandi	A/V/P
3	Ibrar Ahmad Khan S/O Muhammad Sarfaraz	Sub-Inspector	GPS Nadrar	A/V/P
4	Fazal-ur-Rehman S/O Abdur Rehman	Sub-Inspector	Jaba Malikour	A/V/P
5	Fakhr-ud-Din S/O Abdul Aziz	Sub-Inspector	GPS Jhaland	A/V/P
6	Muhammad Riaz S/O Muhammad Naroon	Sub-Inspector	GPS Bural	A/V/P
7	✓ 7. Iqbal Ahmad S/O Abdur Rashid	Sub-Inspector	Ch. I. Jhaland	A/V/P
8	S. Niaz Ali Shah S/O Sher Shah	Sub-Inspector	Met. Babral	A/V/P
9	Muhammad Iqbal S/O Shah Navaz	Sub-Inspector	Met. Babral	A/V/P
10	Shaed-ur-Rehman S/O Abdur Rehman	Sub-Inspector	J. Babral	A/V/P
11	Muhammad Hanif S/O Muhammad Fareed	Sub-Inspector	Met. Babral	A/V/P
12	Abdul Malik Khan S/O Abdul Hamid	Sub-Inspector	Met. Babral	A/V/P
13	Razaqat Ali S/O Khalifa Khan	Sub-Inspector	Met. Babral	A/V/P
14	Naseem-ud-Din S/O Hamid-ud-Din	Sub-Inspector	Met. Babral	A/V/P
15	Shafiq Hussain S/O Said Umar Khan	Sub-Inspector	Met. Babral	A/V/P
16	Muhammad Manif-ul-Haq S/O Muhammad Maroof	Sub-Inspector	Naka Babral	A/V/P
17	Muhammad Rafique S/O Muhammad Ashraf	Sub-Inspector	Gaungat	A/V/P
18	Nadim Hussain S/O Nazir Hussain	Sub-Inspector	Betyani	A/V/P
19	Mubarak Ali Shah S/O Said Ali Shah	Sub-Inspector	Met. Babral	A/V/P
20	Shah Khalid S/O Jahan Zeb	Sub-Inspector	Naka Babral	A/V/P
21	Aziz-ur-Rehman S/O Muhammad Fareed	Sub-Inspector	Met. Babral	A/V/P
22	Abdur Razaq S/O Ghulam Hassan	Sub-Inspector	Met. Babral	A/V/P
23	Said Khan S/O	Sub-Inspector	Met. Babral	A/V/P

21	Asif Khan S/O	Banda Paraso	Sarai	A/V/P
22	Sheer Zaman	Banda Paraso	MSQ: Javed Kauder	A/V/P
23	Muhammad Rafeed S/O	Banda Paraso	MSQ: Farar Sheral	A/V/P
24	Ghulam Sarwar Khair	Banda Paraso	Mora Daira	A/V/P
25	Ull Nawaz Khan S/O	Banda Paraso	GPS Banda Talur	A/S/P
26	Muhammad Miskeen	Banda Paraso	" Riaz Abad	A/V/P
27	Sajjad Ahmad S/O	Banda Paraso	" Rash Sakandara	A/S/P
28	Muhammad Haroon	Banda Paraso	" Tharda	A/S/P
29	Muhammad Adil S/O	Banda Paraso	" Tharda	A/S/P
30	Molvi Ghulam Mustafa	Banda Paraso	" Trangri Payeen	A/V/P
31	Muhammad Yousof S/O	Banda Paraso	" Baki Sandhar	A/V/P
32	Abdur Rehman	Banda Paraso	" Besala	A/V/P
33	Shehzad Jami S/O	Banda Paraso	" Riaz Abad	A/V/P
34	Shah Jahan	Banda Paraso	" Terhari	A/V/P
35	Muhammad Zubair S/O	Banda Paraso	" Karuka Syedan	A/V/P
36	Saif-ur-Rehman	Banda Paraso	" Rash Sakandara	A/V/P
37	Tariq Aziz S/O	Banda Paraso	MSQ: Chawan	A/V/P
38	Muhammad Yousof	Banda Paraso	GPS Sehra Gali	A/V/P
39	Muhammad Bashir S/O	Banda Paraso	" Nadray	A/V/P
40	Muhammad Daud	Banda Paraso		
41	Muhammad Arif S/O	Banda Paraso		
42	Muhammad Sulman	Banda Paraso		
43	Muhammad Bashir S/O	Banda Paraso		
44	Zulfikar Afri S/O	Banda Paraso		
45	Muhammad Zaman	Banda Paraso		
46	Fazal Rabi S/O	Banda Paraso		
47	Ghulam Samdani	Banda Paraso		
48	Muhammad Basharat	Banda Paraso		
49	S/O Ghulam Rasool	Banda Paraso		
50	Naveed Alam S/O	Banda Paraso		
51	Faiz Alam	Banda Paraso		
52	Rehmatullah S/O	Banda Paraso		
53	Muhammad Shah	Banda Paraso		
54	Alwad Nawaz S/O	Banda Paraso		
55	Muhammad Ayub	Banda Paraso		
56	Fakhar-ud-Din S/O	Banda Paraso		

**Terms & Conditions**

1. They should submit their charge reports to all concerned.
2. Their appointment is purely on temporary basis & liable for termination at any stage without assigning any reason/notice.
3. Their appointment is subject to the verification of their original testimonial/Academic/Professional both.
4. Their original Academic & professional certificates should be checked thoroughly before handing over the charge and should not be handed over the charge if their original certificates are not found correct.
5. They should not be handed over the charge if they are below 18 years and above 30 years.
6. Their pay will not be drawn until they produce age & health certificates from Medical Superintendent DHO Hospital Munshehra.
7. They will be governed under prescribed Rules of the Govt of N.W.F.P.

**Note:-**

The Appointments have been made purely on merit in accordance with the Notification No. SOR(S&GAD) 1-117/91 dated 01/02/1993, by adopting formula 50% on merit in open competition and 50% on

DISTRICT EDUCATION OFFICER  
STATE PRIMARY MANSHERA

*Received*

ALL THE CANDIDATES

DISTRICT ACCOUNTS OFFICER

DISTRICT EDUCATION OFFICER

DISTRICT EDUCATION OFFICER

DISTRICT EDUCATION OFFICER  
STATE PRIMARY MANSHERA

(HAD NAWAZ KHAN)

CONSULTANCY UNIT

*Signature*

(7A)

7/11

A

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



Personal Information of Mr IFTIKHAR AHMED d/w/s of ABDUL RASHID

Personnel Number: 00226411 CNIC: 1350306428733 NTN:  
Date of Birth: 23.04.1974 Entry into Govt. Service: 18.12.1996 Length of Service: 27 Years 08 Months 015 Days

Employment Category: Active Permanent

Designation: PRIMARY SCHOOL HEAD TEACH 80003206-DISTRICT GOVERNMENT KHYBE

DDO Code: MA6145-Mansehra

Payroll Section: 001 GPF Section: 001 Cash Center: 2  
GPF A/C No: GPF Interest applied GPF Balance: 703,731.00 (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	550,000.00	-16,000.00	166,000.00

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.): -27,363.00 Net Pay: (Rs.): 101,636.00

Payee Name: IFTIKHAR AHMED  
Account Number: PLS 568-0  
Bank Details: NATIONAL BANK OF PAKISTAN, 231907 NOGAZI BRANCH KASHMIR ROAD MANSEHRA NOGAZI BRANCH KASHMIR RD MANSE, MANSEHRA

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: MANSEHRA  
City: MANSEHRA Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official  
Temp. Address: City: Email: sardariftakhar80@gmail.com

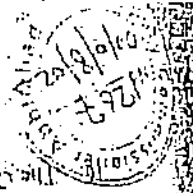
Affixed

11/1/2020

DEPUTY SECRETARY (POLICY)  
(WAZIRIYA LAJNA)

*[Handwritten signature]*

The Director, Administration Department.  
The Section Officer (Admn), Administration Department.  
The Deputy Director (IT), E&A Department.  
The Registrar, Kyber Pakhtunkhwa Public Service Commission, Peshawar.  
The Registrar, Kyber Pakhtunkhwa Service Tribunal, Peshawar.  
All Deputy Commissioners in Kyber Pakhtunkhwa.  
All Autonomous/Semi Autonomous Bodies in Kyber Pakhtunkhwa.  
All Heads of Attached Departments in Kyber Pakhtunkhwa.  
All Divisional Commissioners in Kyber Pakhtunkhwa.  
The Principal Secretary to Chief Minister, Kyber Pakhtunkhwa.  
The Principal Secretary to Governor, Kyber Pakhtunkhwa.  
All Administrative Secretaries to Govt. of Kyber Pakhtunkhwa.  
The Senior Member Board of Revenue, Kyber Pakhtunkhwa.  
Development Department.



Additional Chief Secretary, Govt. of Kyber Pakhtunkhwa, Planning & Development Department.  
The Senior Member Board of Revenue, Kyber Pakhtunkhwa.  
All Administrative Secretaries to Govt. of Kyber Pakhtunkhwa.  
The Principal Secretary to Governor, Kyber Pakhtunkhwa.  
The Principal Secretary to Chief Minister, Kyber Pakhtunkhwa.  
All Divisional Commissioners in Kyber Pakhtunkhwa.  
All Heads of Attached Departments in Kyber Pakhtunkhwa.  
All Autonomous/Semi Autonomous Bodies in Kyber Pakhtunkhwa.  
All Deputy Commissioners in Kyber Pakhtunkhwa.  
The Registrar, Kyber Pakhtunkhwa Service Tribunal, Peshawar.  
The Registrar, Kyber Pakhtunkhwa Public Service Commission, Peshawar.  
The Deputy Director (IT), E&A Department.  
The Section Officer (Admn), Administration Department.  
The Director, Administration Department.  
Average 20 gazetted copies.

DATE NO & EVEN DATE

CHIEF SECRETARY  
GOVERNMENT OF THE KYBER PAKHTUNKHWA

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

AMENDMENT

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

Dated Peshawar the 06/08/2020

NOTIFICATION

GOVERNMENT OF  
KYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
REGISTRATION-WING



B 8

5

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.

(WAJDAH LATIF  
DEPUTY SECRETARY (POLICY)

Attest  
Dine

*Handwritten:* Attached  
*Handwritten:* [Signature]

*Handwritten:* 21.8.23  
*Handwritten:* [Signature]

Special Officer (Policy)

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

Copy forwarded to Mr. [Name]

(Sanitation Officer (Policy))

Yours faithfully,

Further, those 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 Services (Recruitment & Discipline) Rules, 1979.

The basic rationale behind the deletion of the bid rule is aimed at preventing a provision exists to decline or forgo promotion.

(3) of Rule 7 of Khyber Pakhtunkhwa Civil Services (Appointment, Promotion and Transfer) Rules, 1979 stands deleted vide this departmental notification dated 06.08.2020 (iv), no 21/2020.

I am directed to refer to your letter No. SO(Primary-Marks)-122-2020 dated 06.08.2020 in the subject noted above and to state that Sub-Rule 2.1 of the said Rules is deleted.

Subject: **DELETION OF RULE 7 IN THE CIVIL SERVICES (APPOINTMENT, PROMOTION AND TRANSFER) RULES, 1979.**

The Government of Khyber Pakhtunkhwa, Ministry of Secondary Education Department.

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
No. SO(Policy)-122-2020  
Dated: Islamabad the June 06, 2023.



*Handwritten:* [Signature]

ANNEXURE

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

M.O (Primary-MYE&SED/2-6/2023  
Dated Peshawar the. June 26<sup>th</sup>, 2023

To,

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

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

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

(MUHAMMAD ISHAQ)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

SECTION OFFICER (PRIMARY MALE)

Attested

*[Signature]*



12

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

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

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

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

Attested  
A/30

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.

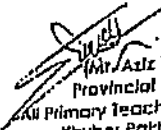
S#	NAME	DESIGNATION
1	Mr. Fazal Wahid	Deputy Director Establishment of Directorate Elementary & Secondary Education Department
2	Mr. Aziz Ullah	Provincial President All Primary Teachers Association Khyber Pakhtunkhwa
3	Mr. Razaqat Ullah	General Secretary APTA Peshawar
4	Muhammad Ishaq	Section Officer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


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

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

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


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

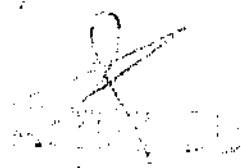
  
(Mr. Aziz Ullah)  
Provincial President  
All Primary Teachers Association  
Khyber Pakhtunkhwa

  
(Mr. Razaqat Ullah)  
General Secretary APTA  
Peshawar

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

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

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 715 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

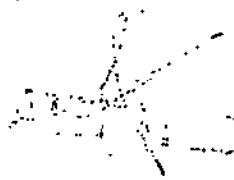
\_\_\_\_\_

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

\_\_\_\_\_

(Abdullah)  
Additional Secretary (Establishment)

Attested  
Aziz



15

ADMINISTRATIVE

E



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

No. SO(Priary-M)E&SED/2-2/Appointment-Rule /2023  
Peshawar Dated 23<sup>rd</sup> 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)/ E&AD/ 1-3/2020 dated  
05<sup>th</sup> June 2023 and to state that after deletion of rule 7(5) Khyber Pakhtunkhwa Civil  
Servant (Appointment, Promotion & Transfer Rules 1989) it has been intimated that those  
officers/ officials who do not comply with promotion order of the competent authority or  
try to evade promotion through different means shall be proceed under Khyber  
Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules, 2011.

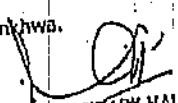
2. In this connection it is submitted that in some cases lady teacher of primary  
level who avail such promotions have to face serious inconvenience while they have to  
perform duties in the remotest station with no residential or transport facility. Most of  
them are married with kids and elder father 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.

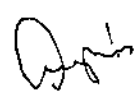
  
(MUHAMMAD ISHAQ)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

  
SECTION OFFICER (PRIMARY MALE)  
26/8/23

Scanned with CamScanner

Attested  


Attest  
[Signature]

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

In this connection it is submitted that in some cases badly  
teachers 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 local teacher in primary schools.

Dear Sir,  
I am directed to refer to your letter No. SO (Primary) (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. SO (Primary-M) (E&SE) / 8-1  
Amendment - Rule / 2023  
Reference Dated 23rd August 2023.

[Signature]



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

AM

F

Handwritten notes and initials

To

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

Subject: -

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

Dear Sir,

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

Yours faithfully,

Section Officer (Policy)

Endst. Of even No & date

Copy forwarded to the:-

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

WP442-2023 AZIZULLAH VS GOVT OF PK

Handwritten initials

-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/12/  
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. SDR-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 06-08-2023
  - (i) Now it is obligatory upon civil servant to accept promotion.
  - (ii) It is prerogative of civil servant to either accept/turn down 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 6-06-2023 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 actions please.

Copy of the above to;

1. PA to Director Local Directorate
2. Master Copy

Assistant Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa.

Attested  
[Signature]

Handwritten signature and initials at the top left of the page.

WP4442-2023 AZ2ULAH VS GOVT CP PG43

Assistant Director (Establishment)
Elementary & Secondary Education
Khyber Pakhtunkhwa

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

Copy of the above is in...

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

The case is submitted for perusal and necessary actions please.

Departmental Promotion Committee.
provided they fulfill their written report to condition of the meeting of
Teachers below 10% may be exempted of implications of the amendment in the rules bid

73) have offered negatively a huge number of Female Teachers. Thus it is proposed that

In view of the above, this office is of considered opinion that the violation of Rules

has been asked for submission of consolidated case.

Chairman/Secretary, Additional Secretary Establishment at his office, has

That, in the light of the minutes of meeting held 6-07-2023 held under the

(Primary-4) E&SED/2-1/Appointment/2023 dated 12-06-2023.

The same was received by this office from your good office vide letter No.SO

will serve to accept promotion under every condition.

that there exists no provision to decline or forego promotion, it is obligatory upon every

That the Government of Khyber Pakhtunkhwa Establishment Department (Registration

No.SO (Primary-4) E&SED/2-1/Appointment/2023 for necessary guidance.

That your office forwarded the same to the quarter concerned vide letter

promotion.

(ii) If it is the prerogative of the civil servant to either accept or turn down the offer of

(i) Now it is obligatory upon the civil servant to accept promotion in every condition.

No.0987 dated 06-07-2023.

That this office sought guidance from your good office in the following words vide letter

vide letter/circular No. SO-R-1 (E&AD)/1-1/2020 dated 06-08-2020.

dated Rule 73) in the Civil Servants (Appointment, Promotion & Transfer Rules 1989)

That Government of Khyber Pakhtunkhwa Establishment Department (Registration Wing)

Q. Miscellaneous of the meeting/ST/2023 dated 10-07-2023 on the subject cited above and in

I am directed to refer to the letter No.SO(Primary-4)E&SED/2-1

Door Sir,

Subject - MINUTES OF THE MEETING

Khyber Pakhtunkhwa Education, Elementary & Secondary Education Department,

The Section Officer (Primary-Wale)

Khyber Pakhtunkhwa Peshawar

Phone: 091-9223144 Email: establishment@gnibk.com

FR No. 21/SST/K/Governor/Case dated 21-7-2023

20



PSHT طومار کے لئے

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Khyber Pakhtunkhwa



Aziz Ullah Khan  
President  
0333-6414648  
azizullah1973@gmail.com  
apinkal

APTA House  
Govt. Primary School No.1  
Gulistan Peshawar City.

آل پرائمری ٹیچرز ایسوسی ایشن (اپٹا) خیبر پختونخوا

Annexure - A

22

مہربان: نیکر لڑی ویلز کی سیکرٹری اور چیئر پرسن خیبر پختونخوا  
مہربان: آل پرائمری ٹیچرز ایسوسی ایشن خیبر پختونخوا  
جناب عالی

گزارش ہے کہ پروسٹنٹ برادرس نے اس کے بارے میں کوئی اطلاع دی ہے کہ وہ اس کی خواہش اور اس کے پروسٹنٹ کا ایک ٹولہ کرنا کہ جو لازم ایک آرگن  
مجرب کی قوت ایک ولہ پروسٹنٹ نہ لیں تو وہ پھر آجہا پاد سال تک پروسٹنٹ لیں لے سکتے تھے مطلب پاد سال تک پھر اس کی پروسٹنٹ لیں اور اس کی  
پھر اس ٹولہ میں سرمایہ و مالیت ہی کا پاد سال مال ہوتے تھے کہ اس کی ایک لازم ایک سال پروسٹنٹ نہ لیں تو وہ دوسرے سال لے سکتے تھے  
لیکن اب ایک وقت پہلے ایک اور نوٹیفکیشن آیا ہے  
جس کے مطابق اب وہ لازم پروسٹنٹ ضرور لیں گے اگر نہیں لیں گے تو اس کے خلاف ایک نوٹیفکیشن لگا کر اس کے مطابق کارروائی کر لے گا کیا گیا ہے  
واصل یہ آئی نوٹیفکیشن بنیادی انسانی حقوق کی کئی خلاف ورزیاں ہے جسے کہ وہ وہاں اور یہاں ملحقین میں خاص کر خواتین امتداد کے اہلکاروں کے مطابق کا  
مناہگہ کرنا ہے  
تاکہ عام حالات میں بھی زبردستی پروسٹنٹ اور دوسرا بیجا بنیادی انسانی حقوق کی خلاف ورزی ہے کہ وہ خیبر پختونخوا میں پروسٹنٹ سے لاعلمی و غیبت  
میں لیا گیا ہے لیکن حالات میں یہ لیا نوٹیفکیشن جو BRSSSE کی کارروائی لیکر کی جڑا ہے میں کیا گیا ہے جو بدستور اور بنیادی انسانی حقوق کی خلاف ورزی  
ہم اس کے خلاف ٹولہ پاد سال ہر سال کا حق بھی منسوخ کر کے لیا  
لہذا ہم آپ سے درخواست کرتے ہیں کہ وہ نوٹیفکیشن کو واپس لیا جائے یا اس میں ڈیمس کر کے پرائمری امتداد کے (Relaxation) دیا جائے اور ان کے  
زبردستی پروسٹنٹ لینے کی اجازت ان کو مرخصی سے لینے دیا جائے  
اور پروسٹنٹ نہ لینے کی صورت میں امتداد اپنا لیا جائے لیکن یہ زبردستی نہ کی جائے  
اس میں بنیادی انسانی حقوق کے خلاف تمام (DRO) لیا اور کہ ایک خصوصی معاملہ جاری کیا جائے تاکہ امتداد میں سب سب لیا جائے پرائمری امتداد کے ذمہ  
البتہ اور ہر جگہ سے لیا جائے  
کہہ کر نوٹیفکیشن بدل دی ہے یا پرائمری امتداد کو اپنی طور پر اور چرکے کا مسئلہ شروع ہو چکا ہے  
لہذا ہم یہ توقع رکھتے ہیں کہ آپ صاحبان کوئی ایجنس لکھ سب کے پرائمری امتداد خصوصاً سبیل پرائمری امتداد کو اس ذمہ الیبتہ سے بہت دلائل کے

شکریہ

  
08/11/23

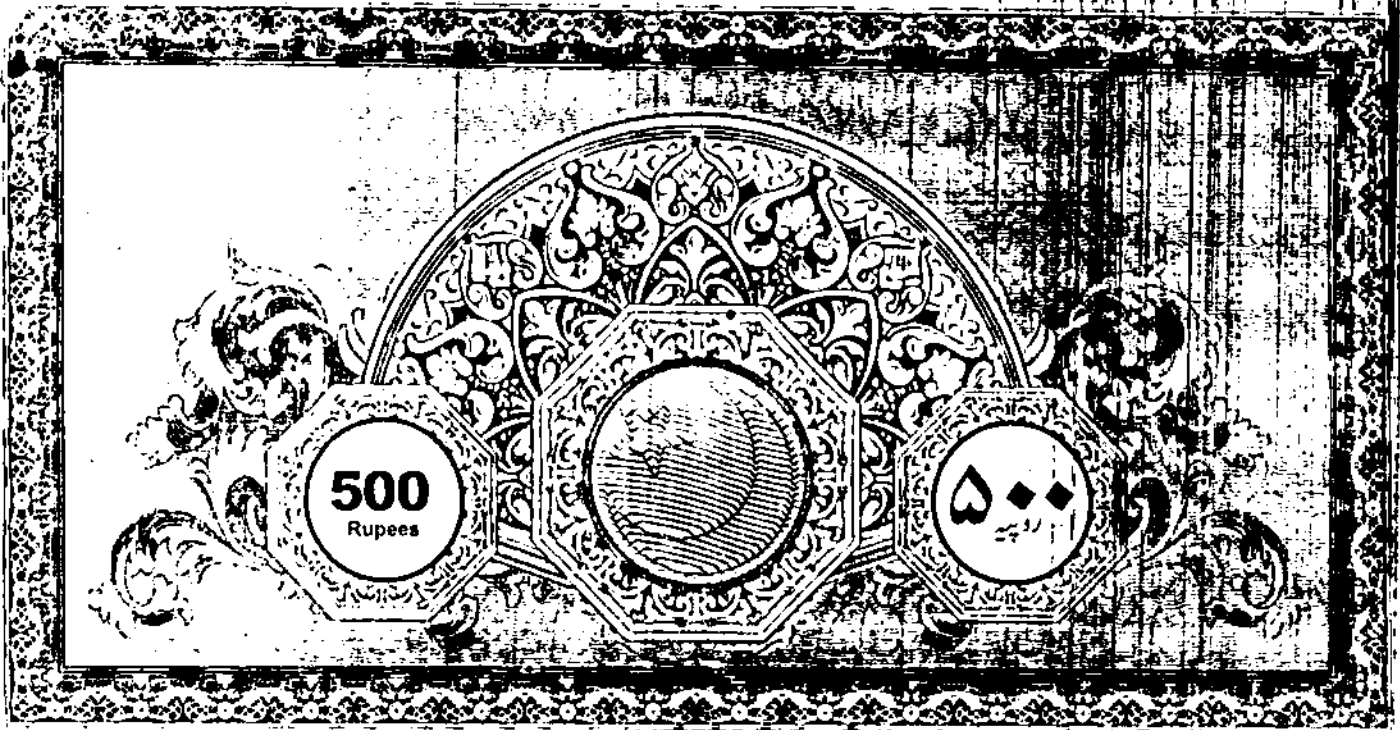
عزیز اللہ خان صوبائی صدر  
آل پرائمری ٹیچرز ایسوسی ایشن خیبر پختونخوا

APTA

(23)

AUGUST 1997

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	PTC Date	TO charge
482	1983	GPS KHUMARIAN	AHMAD NAWAZ	MUHAMMAD AYUB	15	MA		PTC/CT/MA Edu	01/05/1976	31-May-17	29/11/1995	29/11/1995	29/11/1995
483	1988	GPS GUL DHERI	AFZAL AHMAD	M AFZAL	15	BA		PTC/CT/B.ed	01/04/1973	31-May-17	30/11/1995	30/11/1995	30/11/1995
484	1992	GPS KOT DALBANI	MUHAMMAD BASHARAT	GHULAM RASOOL	15	MA		PTC/CT/B Ed	02/01/1978	31-May-17	30/11/1995	30/11/1995	12/11/1995
485	1996	GPS BHUSSA	ZULFIQAR	MUHAMMAD RAFIQ	15	FA		PTC	13/07/1958	31-May-17	01/12/1995	01/12/1995	01/12/1995
486	2000	GPS BANPHORA	SHAMS UL HAQ	MUHAMMAD JAN	15	MA		PTC/B EDM ED	15/02/1973	31-May-17	01/12/1995	01/12/1995	01/12/1995
487	2001	GPS PALLYANI	MUHAMMAD SHAFIQUE	MUDAT KHAN	15	FA		PTC	01/04/1973	31-May-17	01/12/1995	01/12/1995	01/12/1995
488	2010	GPS DHAMAN SHARIF	MUHAMMAD SIRAJ	HAFIZ SARFRAZ	15	BA	2nd	PTC/CT/B ed	13/03/1957	31-May-17	03/12/1995	03/12/1995	03/12/1995
489	2011	GPS BASALA	MUHAMMAD BASHER	BAZA	15	MA		PTC/B ED	04/02/1975	31-May-17	03/12/1995	03/12/1995	12/11/1995
490	2013	GPS SAVER	SHAD MUHAMMAD	ABDUL WAKEEL KHAN	15	FA		PTC	10/02/1973	31-May-17	08/12/1995	08/12/1995	08/12/1995
491	2016	GPS SHADORE BALA	MUHAMMAD AYAZ	M. ASLAM KHAN	15	BA		PTC	02/02/1971	31-May-17	10/12/1995	10/12/1995	10/12/1995
492	2019	GPS JAMAL MARI	ZAIN MUHAMMAD	MUHAMMAD BASHIR	15	FA		PTC	25/12/1972	31-May-17	15/12/1995	15/12/1995	15/12/1995
493	2020	GPS DOONG JARED	DILDAR	SHAH JHAN	15	FA		PTC	13/01/1973	31-May-17	15/12/1995	15/12/1995	15/12/1995
494	2021	GPS PATTI JARED	PARISTAN	ARABISTAN	15	BA		PTC	01/01/1972	31-May-17	18/12/1995	18/12/1995	18/12/1995
495	2022	GPS ZAFFAR MAIDAN	IFTIKHAR AHMED	ABDUL RASHEED	15	BA		PTC/CT/B ed	23/04/1974	31-May-17	18/12/1995	18/12/1995	18/12/1995
496	2023	GPS AHL NO 2	M ILYAS	M YOUSAF	15	BA		PTC/CT	05/02/1970	31-May-17	31/12/1995	31/12/1995	25/08/1992
497	2034	GPS CHAPRA BALA	MUHAMMAD NAZEER	SHAMSHER	15	BA		PTC	16/03/1965	31-May-17	13/05/1997	13/05/1997	01/05/1988
498	2037	GPS BATI ARBORA	GUL MUHAMMAD	GUL REHMAN	15	BA		PTC/B.ed	12/03/1968	31-May-17	13/05/1997	13/05/1997	02/04/1992
499	2040	GPS LACHI MANG	NIZAKAT HUSSAIN SHAH	SYED HASSAN SHAH	15	FA		PTC	01/01/1957	31-May-17	13/05/1997	13/05/1997	21/03/1988
500	2043	GPS HOLA	SARDAR HUSSAIN SHAH	NOOR HASSAN SHAH	15	FA		PTC	24/04/1957	31-May-17	13/05/1997	13/05/1997	15/05/1988
501	2044	GPS KUND BANDA GAYAN	SHAD MUHAMMAD	WALI MUHAMMAD	15	BA		PTC	25/04/1957	31-May-17	13/05/1997	13/05/1997	21/01/1990
502	2046	GPS MADSERIAN	MUHAMMAD SHAH NAWAZ	BANA KHAN	15	FA		PTC	09/01/1968	31-May-17	13/05/1997	13/05/1997	25/04/1989
503	2049	GPS GUDWAI	NASIR SAEED	MUHAMMAD SAEED	15	FA		PTC	14/04/1968	31-May-17	13/05/1997	13/05/1997	10/10/1989
504	2050	GPS BAFFA KALAN	SHAHZAD AHMED	MALAK AMAN	15	BA		PTC/B.ed	28/08/1968	31-May-17	13/05/1997	13/05/1997	30/06/1992
505	2051	GPS DAHRA BANDA	TAHIR	DOOST MUHAMMAD	15	BA		PTC/CT/B.ed	01/01/1969	31-May-17	13/05/1997	13/05/1997	31/08/1992
506	2053	GPS RARI JANDA	ABDUL SATTAR	ABDUR REHIM	15	BA		PTC/B Ed	15/11/1969	31-May-17	13/05/1997	13/05/1997	25/04/1990
507	2054	GPS THATHI KHURD	ATTAUR REHMAN	ABDUR REHMAN	15	MA		PTC/CT/B.ed	04/01/1970	31-May-17	13/05/1997	13/05/1997	27/08/1992
508	2057	GPS KHAKHOO	MUHAMMAD AYYAZ	AMEER MUHAMMAD	15	FA		PTC	06/03/1970	31-May-17	13/05/1997	13/05/1997	27/08/1992
509	1914	GPS BATANGI	HABIBUR REHMAN	MIR ZAMAN	15	BA		PTC	05/01/1971	31-May-17	25/05/1995	25/05/1995	31/10/1989
510	2063	GPS RATHIRA	BASHIR HUSSAIN SHAH	S FAREED SHAH	15	FA		PTC	27/04/1971	31-May-17	13/05/1997	13/05/1997	30/04/1989
511	1806	GPS DHAIR	MUHAMMAD RIAZ	TAJ MUHAMMAD	15	BA		PTC	08/05/1974	24-Apr-19	18-01-95	18-01-95	18-01-95
512	1961	GPS BHER KAND	HAFEEZ UL HAQ	MOHAMMAD MAROOF	15	BA		PTC	20/09/1972	24-Apr-19	13-11-95	13-11-95	13-11-95
513	2064	GPS DHERI SHARKOOL	MUHAMMAD FAROOQ	AZIZ UR REHMAN	15	MA		PTC/CT/B ec.M.ed	30/05/1972	24-Apr-19	13/05/1997	13/05/1997	01/09/1992
514	2066	GPS OAZI ABAD	ADIL KHAN	M ISHAQ KHAN	15	BA		PTC/B ED	05/03/1973	24-Apr-19	13/05/1997	13/05/1997	30/08/1992
515	2073	GPS BANDI GULLO NO 2	ALI MUNSIF	ALI ZAMAN	15	BA		PTC/B Ed	09/08/1970	24-Apr-19	26/08/1997	26/08/1997	25/06/1997
516	2075	GPS CHANDWAL	AKHTAR ZEB	AURANG ZEB	15	BA		PTC/CT	15/03/1974	24-Apr-19	26/08/1997	26/08/1997	25/06/1997
517	2082	GPS HAIR NAROTI	SHAKID HUSSAIN SHAH	MAQBOOL SHAH	15	MA		PTC/CT/B.ed	06/06/1968	24-Apr-19	27/08/1997	27/08/1997	27/08/1997
518	2088	GPS CHAMIAL	MUHAMMAD RIAZ	KHAWAJ MUHAMMAD KHAN	15	BA		PTC	23/03/1974	24-Apr-19	27/08/1997	27/08/1997	25/06/1997
519	2089	GPS SHADORE PAIN	SAJAD AHMAD	AKBAR KHAN	15	MA		PTC/M.ed	05/09/1974	24-Apr-19	27/08/1997	27/08/1997	27/08/1997
520	2092	GPS PHULALA	RAZA ALI SHAH	MUKHTAR HUSSAIN SHAHA	15	BA		PTC/CT/B.ed	29/08/1976	24-Apr-19	27/08/1997	27/08/1997	27/08/1997
521	2093	GPS KANGAR DOGA	MUHAMMAD SALEEM	MIR ZAMAN	15	BA		PTC	10/12/1976	24-Apr-19	27/08/1997	27/08/1997	27/06/1997
522	2099	GPS GHAZIKOT	MUHAMMAD MUMTAZ	MUHAMMAD WAHAB	15	MA		PTC/CT/B ED	05/05/1978	24-Apr-19	27/08/1997	27/08/1997	27/08/1997
523	2102	GPS BARWALA	MUHAMMAD YOUSAF	SAID RASOOL	15	BA		PTC/CT	02/01/1970	24-Apr-19	28/08/1997	28/08/1997	25/06/1997
524	2103	GPS SORAI BANDI	MUHAMMAD IRSHAD	MUHAMMAD MISKIN	15	MA		PTC/B ED	03/04/1971	24-Apr-19	28/08/1997	28/08/1997	25/06/1997
525	2111	GPS BANDI GULLO NO.1	MUHAMMAD HANIF	MUHAMMAD MAHROOF	15	BA		PTC	10/04/1973	24-Apr-19	28/08/1997	28/08/1997	25/06/1997
526	2118	GPS MOH	ABDUL MALIK	ABDUR REHMAN	15	BA		PTC	12/05/1974	24-Apr-19	28/08/1997	28/08/1997	25/06/1997
527	2119	GPS CHAIRAN	MUHAMMAD JAVED	MUHAMMAD SADIQ	15	MA		PTC/CT/B Ed	01/01/1975	24-Apr-19	28/08/1997	28/08/1997	25/08/1997
528	2120	GPS KEN GALI	JEHANGIR KHAN	GHULAM QADIR	15	BA		PTC	03/01/1975	24-Apr-19	28/08/1997	28/08/1997	25/08/1997
529	2121	GPS CHANDORE	MUHAMMAD AFZAL	ALI AFSAR	15	BA		PTC	10/02/1975	24-Apr-19	28/08/1997	28/08/1997	25/08/1997
530	2122	GPS CHAKAL BALA	MUHAMMAD ARSHAD	FAQIR MUHAMMAD	15	BA		PTC/CT	03/03/1975	24-Apr-19	28/08/1997	28/08/1997	25/08/1997
531	2124	GPS KAMILORIAN	MUHAMMAD ILYAS	ABDUL MANAN	15	BA		PTC/CT	02/09/1975	24-Apr-19	28/08/1997	28/08/1997	25/08/1997



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JBAM No. BC No.

25

DBAM No. 338

BC No. 10-2458

Name of Advocate طاہر ساجد

S.No 53755

Fee Rs. 200/-



2024-25  
GENERAL SECRETARY  
District Bar Association  
Mansehra

## وکالت نامہ

بعدالت: سروس ٹریبونل کراچی  
عنوان: افتخار احمد  
منجانب: ایبٹ آباد  
نوعیت مقدمہ: سروس ایبٹ آباد

باعث تحریر آنکہ

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

طاہر ساجد ایڈووکیٹ عالی کورٹ

کو بدیں شرائط وکیل مقرر کیا 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 منظر 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 منظر 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 ڈنٹاشی و راضی 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 ادا سنگی علیحدہ مختار ادا کرنے کا مجاز ہوگا اور بصورت ضرورت بدوراء مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا بیرٹر 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 پرداخت 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

طاہر ساجد

ACCEPTED

افتخار احمد  
صدر ایبٹ آباد  
ایبٹ آباد