


FORM OF ORDER SHEET

Court of _____

Appeal No. 1873 /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 # 1873/2024

BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA

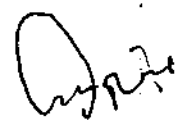
Ashfaq Ahmed.....Appellant

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. 1873 /2024

Ashfaq Ahmed son of Aftab Ahmed PSHT (BPS-15) at GPS
bajna Mera, Manshra Date of Appointment
Appellant

Versus

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

**SERVICE APPEAL UNDER SECTION 4 OF KPK
SERVICE TRIBUNAL ACT, 1974 AGAINST THE
IMPUGNED NOTIFICATION NO. SO(Policy)E&AD/1-
3/2020 DATED 06.08.2020 COMMUNICATED BY
RESPONDENT NO. 2 VIDE LETTER DATED
06.06.2023 WHEREIN IT WAS STATED THAT SUB
RULES 5 OF RULE 7 KHYBER PAKHTUNKHWA CIVIL
SERVANT (APPOINTMENT, PROMOTION AND
TRANSFER) RULES, 1989 STANDS DELETED.**

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.

Appellant
 Tahir Sayid
 Through:-
 Tahir Sayid Advocate
 High Court, District
 Courts, Manschhra

08/16/24
 ACCEPTED

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.
 Tahir Sayid

**BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA**

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

Ashfaq 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, Manshura**

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.

(Signature)

RECEIVED
23/08/24

DISTRICT EDUCATION OFFICER
(MALE) HANSENRA.

111
111

- 1. Sub-Divisional Education Officer (Male) Hansenra.
- 2. Head teacher Govt. Primary School concerned.
- 3. Candidate concerned.
- 4. P.O. Office.

Copy forwarded for information & n/a to:-
 District Education Officer (Male) Hansenra.
 District Education Officer (Male) Hansenra.
 P.O. Office.

5487-90

(MURSHID AHMAD KHAN)
DISTRICT EDUCATION OFFICER
(MALE) HANSENRA.

Note:- Charge report should be submitted to all concerned.
 1. No. TA/DA etc is allowed to any one.
 2. They should produce their age & health certificate from the Medical Officer.
 3. Their age & health certificate may be checked before handing over charge.
 4. They should not be handed over charge if their age is below 18 years and above 25 years.
 5. The appointment are purely temporary & liable to be termination at any time without any reasons.

- 1. Name, father's name, residence, school where appointed, remarks.
- 2. Date of birth, sex, religion.
- 3. Marital status, height, weight, chest, etc.
- 4. Medical history, if any.
- 5. Signature of District Education Officer.

The above following candidates are hereby appointed as Primary Teacher (P.T.) on a temporary basis with effect from the date of taking over charge. The usual conditions of service as applicable to them under the rules in force shall apply. The post is vacant against each in SPS-7 (M/10/58).

Dated: 16-5-1988
 P.O. Office.

DISTRICT EDUCATION OFFICER (MALE) HANSENRA.

ANN: A (7)

OFFICE OF THE SUB-DIVISIONAL EDUCATION OFFICER (MALE) MANSEHRA.

OFFICE ORDER NO. 374

DATED 11/5/88

ADJUSTMENTS.

The following adjustments of PTC/PT teachers are hereby ordered in the interest of public service with immediate effect:

S. No.	Name of Teacher	From	To	Remarks
1.	Ashfaq Ahmad, R/o. Abbas Ahmad R/o. Baffa appointed at GPS. D. Eidgah vide D.O. (M) MSRA D.O. No. 87 dated 16-5-88	Candidate	GPS Sunj (oghi)	Against v/Post with effect from 16.5.88.
2.	Shabir Ahmad: 1, Mohd Ashraf R/o. Baffa appointed at GPS. Taranna vide D.O. (M) MSRA D.O. No. 87 dated 12-5-88	Candidate	GPS Pattian (AKT)	-do-
3.	Khalid Mahmood & Yusuf R/o. Khawari appointed at GPS Garhala/Bhoyi vide D.O. (M) MSRA D.O. No. 101 dated 8-5-88	Candidate	Saira Balochan GPS Dirmaha Khatran (oghi)	-do-

NOTE:

- No TA/DA is allowed to any one.
- Charge receipts should be submitted to all concerned.

Sd/
(Hafiz Mohammad Ilyas)
Sub-Divisional Edu: Officer,
(Male) Mansehra.

Endst. No. 2614-17 / Dated Mansehra th. 11/5/88 1988.

Copy forwarded for information to the:

- Asstt. Sub-Divisional Edu: Officer, (M) Circle concerned. oghi & Balokote
- Headmaster/Headteacher GPS/GPS - Sunj, Pattian, Saira, Balochan
- Headmaster/Headteacher GPS/GPS
- Asstt. Local Officer.

Attn: [Signature]
Officer
Edu:
Mansehra

Sub-Divisional Edu: Officer,
(Male) Mansehra.

(7A)

ADDITIONAL

A



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

Personal Information of Mr ISHFAQ AHMAD d/w/s of AFTAB AHMAD

Personnel Number: 00221497 CNIC: 1350305804987 NTN:
Date of Birth: 01.12.1968 Entry into Govt. Service: 16.05.1988 Length of Service: 36 Years 03 Months 017 Days

Employment Category: Active Temporary

Designation: PRIMARY SCHOOL HEAD TEACH 80990949-DISTRICT GOVERNMENT KHYBE

DDO Code: MA6373-Mansehra

Payroll Section: 001 GPF Section: 001 Cash Center: 5
GPF A/C No: EDUMA008477 GPF Interest applied GPF Balance: 832,962.00 (provisional)

Vendor Number: - Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 15 Pay Stage: 24

Wage type		Amount	Wage type		Amount
0001	Basic Pay	71,440.00	1001	House Rent Allowance 45%	3,524.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	918.00	2199	Adhoc Relief Allow @10%	659.00
2316	Teaching Allowance 2021	3,224.00	2341	Dispr. Red All 15% 2022KP	6,807.00
2347	Adhoc Rel Al 15% 22(PS17)	6,807.00	2378	Adhoc Relief All 2023 35%	24,311.00
2393	Adhoc Relief All 2024 25%	17,860.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3015	GPF Subscription	-4,290.00	3501	Benevolent Fund	-1,200.00
3609	Income Tax	-6,365.00	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	720,000.00	-20,000.00	260,000.00

Deductions - Income Tax

Payable: 101,830.65 Recovered till AUG-2024: 12,730.00 Exempted: 25456.95 Recoverable: 63,643.70

Gross Pay (Rs.): 139,906.00 Deductions: (Rs.): -32,590.00 Net Pay: (Rs.): 107,316.00

Payee Name: ISHFAQ AHMAD
Account Number: PLS 1417-6
Bank Details: NATIONAL BANK OF PAKISTAN, 231423,BAFFA BAFFA, MANSEHRA

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: MANSEHRA City: MANSEHRA Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
Temp. Address: City: Email: ashfaq221497@gmail.com

ANNEXURE

B 8

GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(REGULATION WING)

NOTIFICATION

Dated Peshawar the, 06/11/2020

Policy/E&A/11-3/2020: In exercise of the powers conferred by section 25 of the
Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of
1973) 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-rule (5) shall be deleted.

CHIEF SECRETARY
GOVERNMENT OF THE KHYBER PAKHTUNKHWA

COPIES AND 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 Registrar, 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 (Admn), Administration Department with the request to arrange 20 gazette copies.
16. The Caretaker, Administration Department.

Stamp: 267, 06/11/2020

(WAJIAH LATHI)
DEPUTY SECRETARY (POLICY)

A.H. Saeed

AHmed

Qais

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.

(WARDAH LATIF)
DEPUTY SECRETARY (POLICY)

*Attested
Dy Secy*

Attended
E. J.

WPM-102-2023 AZIZULHAQ VS GOVT OF PAK

Section Officer (Policy)

Section Officer (Policy)

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

Copy forwarded to the:

Head, Government of Sindh

Yours faithfully,
 (Signature)
 Section Officer (Policy)

Further, those officials/officers 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 (Efficiency & Discipline) Rules, 2011, please.

3. Furthermore, those officials/officers 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 (Efficiency & Discipline) Rules, 2011, please.

The basic rationale behind the deletion of the bid rule is aimed at preventing a civil servant from temptation for filling a higher vacant position or to prevent those who tend to forge 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.

2. The basic rationale behind the deletion of the bid rule is aimed at preventing a civil servant from temptation for filling a higher vacant position or to prevent those who tend to forge 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.

provision exists to decline or forgo promotion.

1. I am directed to refer to your letter No. SO/Primary-M/T/14/2023-24 dated 10.04.2023 in the subject noted above and to state that Sub-Rule 13 of Rule 7 of Khyber Pakhtunkhwa Civil Services (Appointment, Promotion and Transfer) Rules, 1974 stands deleted with the department notification dated 04.08.2020 thus, no

Subjects: GUARANTEE REGARDING PROMOTION OR WALK OUT IN THE
GENERAL PAKISTANI CIVIL SERVICES (APPOINTMENT,
PROMOTION AND TRANSFER) RULES, 1974.

The Government of Khyber Pakhtunkhwa
 Efficiency & Secondary Education Department

GOVERNMENT OF KHYBER PAKHTUNKHWA
 ESTABLISHMENT DEPARTMENT
 No. SO/Policy/14/2023
 Dated: Faisalabad, 10th June 2023.



(10)

ATTACHED

ANNEXURE

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 the June 25th, 2023

To

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

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

[Handwritten Signature]
25/6/23

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

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

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

Encl: AA

[Handwritten Signature]

[Handwritten Signature]
(MUHAMMAD I SHAQ)
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

[Handwritten Signature]

[Handwritten Signature]
SECTION OFFICER (PRIMARY MALE)
25/6/23

A Hester
[Handwritten Signature]

12

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

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

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

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

WP442-2023 AZIZULLAH VS GOVT OF PG43

Ahmed
A. S.

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(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.


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

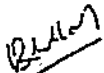
2. The meeting started with recitation from the Holy Quran. The chair welcomed the participants. The Deputy Director (Establishment) of Directorate of Elementary & Secondary Education briefed the forum regarding agenda item in detail.

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. Fozal Wahid)
Deputy Director
E&SE Department



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


(Mr. Rajaqat Ullah)
General Secretary APTA
Peshawar


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

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

VP/4442-2023 AZIZULLAH VS GOVT CP P043

Attended


15

MINUTES OF THE MEETING REGARDING APPLICATION SUBMITTED BY MR AZIZ ULLAH PROVINCIAL PRESIDENT ALL PRIMARY TEACHERS ASSOCIATION KHYBER PAKHTUNKHWA REGARDING DELETION OF RULE 7151 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)

Handwritten signature

15

ADMINISTRATIVE

E



ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
CIVIL SECRETARIAT PESHAWAR
(Phone No.091-8223587)

No. SO(Policy-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 these
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.

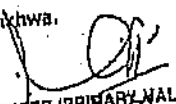
2. In this connection it is submitted that in some cases lady teacher of primary
level who avail such promotions have to face serious inconvenience while they have to
perform duties in the remotest station with no residential or transport facility. Most of
them are married with kids and elder father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

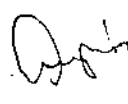

(MUHAMMAD SHAHID)
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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


SECTION OFFICER (PRIMARY MALE)
26/8/23

Scanned with CamScanner

Attested


16

- B/c - - 2 -

No. 50 (Primary - M) E & SE D / 8-2 /
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) (Policy) / E & AD
/ 1-3 / 2020 dated 8th 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)

AH eshaq
[Signature]



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 23.03.2023 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)

Encls. Of even No & date

Copy forwarded to the:-

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

ANNEXURE

17

Ms. N. A. A.
20/9/23

WP-2023-2023 AZIZULAH VS GOVT OF PK

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(S) IN THE
KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT,
PROMOTION AND TRANSFER) RULES, 1989.

Dear Sir,

I am directed to refer to your letter No. SO(Primary-M)/E&SED/2-2/Appointment-
Rule/2023 dated 23.00.2023 on the subject noted above and to state that necessary
guidance has already been tendered to your good office vide this department letter of even
No. dated 06.06.2023 (copy enclosed).

Yours faithfully,

Section Officer (Policy)

Encls. Of even No & date

Copy forwarded to the:-

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

Section Officer (Policy)

Attested
Dujin

Alleged
Copy

WP4442-2023 AZ2UULAH VS GOVT OF POK

National Director
Elementary & Secondary Education
Khyber Pakhtunkhwa

2. Master Copy
1. PD to Director Local Directorate

Copy of the above to:

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

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

no provision to clarify / fix promotion. It is obligatory upon every civil servant to accept promotion under any condition.
That the government of KP-ED (Regulation wing) vide letter No. SO (Policy) EQ/AD/1-2/2020 dated 6-06-2023 accordingly stated that there exists

That your good office forwarded the same to quarters concerned vide letter No. SO (Policy) EQ/SED/2-2/Appointment/2023 for necessary guidance.

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

That government of KP Establishment department (Regulation wing) deleted rule 7(S) in Civil Servant (Appointment, Promotion, Transfer, etc) 1997 present by history, also background of case as under.

I am directed to refer to letter No. (SO) Policy-M/1) EQ/SED/5-1/G/2023/Ministry of meeting 13/1/2023 dated 10-7-2023 on subject cited above and to

Subject: Minutes of Meeting

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

To: DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION, KPK
Peshawar
(21-7-2023)

-B/C-

19

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

WP4442-2023 AZIZULLAH VS GOVT OF PG43

Assistant Director (Establishment) Ministry of Secondary Education, Kyber Pakhtunkhwa

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

Assistant Director (Establishment) Ministry of Secondary Education, Kyber Pakhtunkhwa. Includes a signature and date 17/06/23.

The case is submitted for perusal and necessary actions please.

Main body of the letter containing the subject matter, including references to various government orders and departmental procedures.

I am directed to refer to the letter No. SC/Primary-495/SED/17-17/2023 dated 10-07-2023 on the subject cited above and to present brief history about the background of the case as under:

Subject - MINUTES OF THE MEETING. Dear Sir, The Section Officer (Primary-Male), Ministry of Secondary Education Department, Kyber Pakhtunkhwa Peshawar.

Header information including file number No. 8145, date 27-7-2023, and contact details for the Kyber Pakhtunkhwa Peshawar office.

Handwritten number 20 inside a circle at the bottom left of the page.

خدمت چناب سیکرٹری تعلیم خیبر پختونخواہ

اپیل!

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

(۱) PSHT پہلے سے سکیل 15 میں ذمہ داریاں سرانجام دے رہے ہیں۔ اپیل دہندہ کی عمر 56 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 ہالی 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 استاتذہ حکومت خیبر پختونخواہ سے مطالبہ کرتے ہیں کہ مذکورہ نوٹیفیکیشن کو منسوخ کریں اور استاتذہ کی بے چینی کو ختم کریں۔ ورنہ ہم عدالت جانے میں حق باجانب ہوں گے۔

7/024

اشفاق احمد PHST

GPS بجنہ میرا سرکل بقہ ضلع مانسہرہ

کاپی ٹو!

(۱) جناب سیکرٹری تعلیمات KPK

(۲) جناب ڈائریکٹر تعلیمات KPK

H
(22)

Khyber Pakhtunkhwa

Aziz Ullah Khan
President
C 0333 04 12648
azizullah1973@gmail.com
T 0910041



APTA House
Govt. Primary School Road,
Gulistan Peshawar City.

آل پرائمری ٹیچرز ایسوسی ایشن (اپٹا) خیبر پختونخوا
Annexure - H

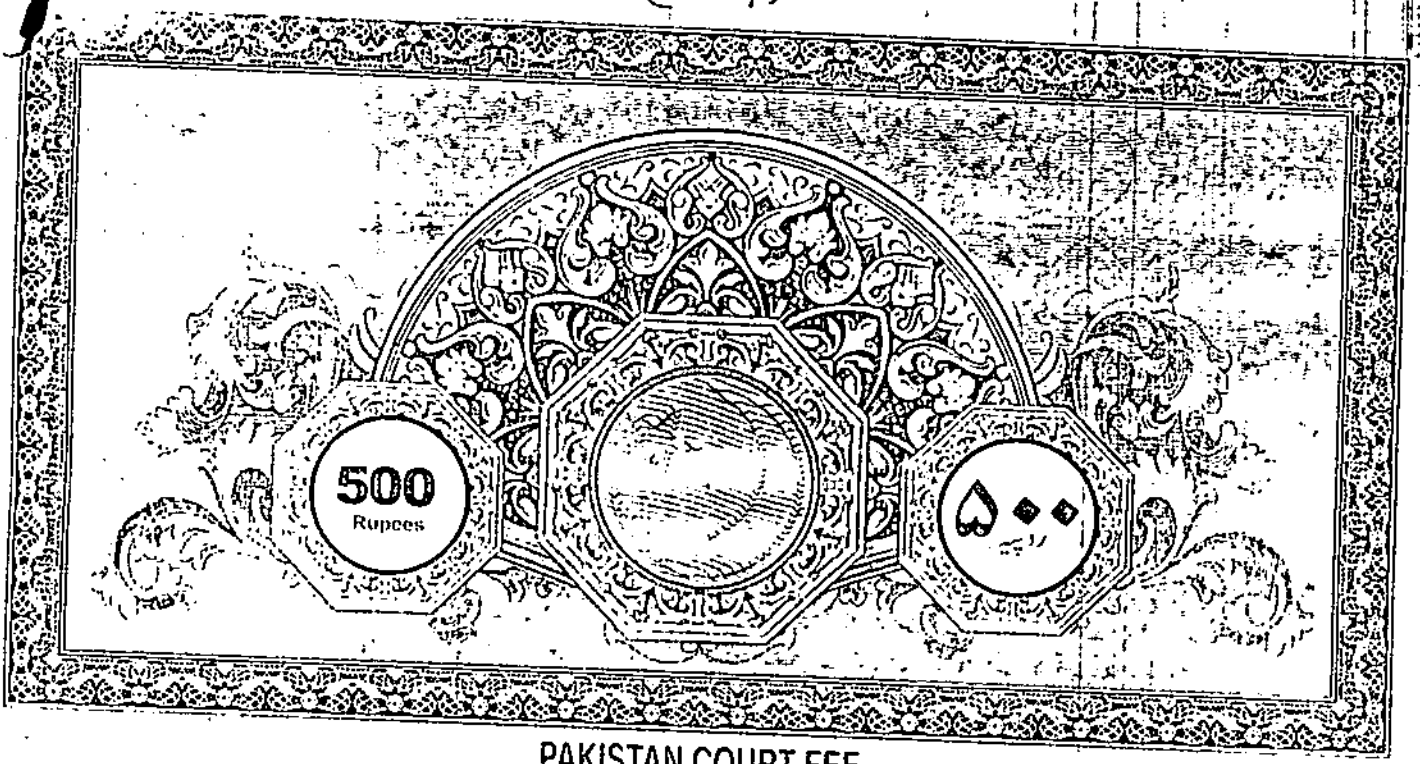
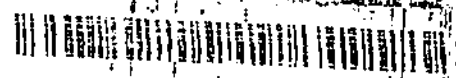
جناب: میجر لی وائٹنگ کی پٹیلا کی ایجنٹ خیبر پختونخوا
جناب: آل پرائمری ٹیچرز ایسوسی ایشن خیبر پختونخوا
جناب: مال

گزارش ہے کہ پرموٹرز ہر اداسے علی اسٹے ہیں کہ سرکاری ملازم کی عوامی اولیٰ سے پرموٹرز کا ایک ٹائون بنا کر تاکہ ہر عام ایک اگر کسی
پہلے کے تحت ایک اور پرموٹرز میں تو ہر آئندہ پانچ سال تک پرموٹرز میں سے بچنے سے منسوب پانچ سال تک ہر اس کی پرموٹرز میں اور کئی کئی
پہلے ہی ٹائون میں قبولی و مہارت کی گئی پانچ سال والی پانچ سال کی عمر کی ہے کہ اگر ایک عام ایک پرموٹرز میں تو ہر دوسرے سال سے سکا ہے
لیکن اب ایک ہفتہ پہلے ایک اور ڈیپٹیشن ہوا ہے
جس کے سکا ہے اب ہر عام پرموٹرز میں سے اگر نہیں لیں گے تو اس کے خلاف ایجنٹ کی ذمہ داری کے مطابق کارروائی کرنے کا کہا گیا ہے
اور اس سے آئی ڈی پٹیشن بنانی انسانی حقوق کی کئی خلاف ورزی ہے سو یہ کہ دو روز اور پہلی ملاقات میں ملازم کو خواتین امتداد کے اجلاس شکایت کا
مہتمم کرنا چاہئے
بیکہ عام ملازم میں بھی ذمہ داری پرموٹرز اور دو روز پہلے بنی انسانی حقوق کی خلاف ورزی ہے کہ کہ ٹیچرز پختونخوا میں پختون سے لاہوری اور کشمیری
کی ادائیگی ہے ایسے ملازم میں یہ یا ڈیپٹیشن ہر DEAS کی ناپی لیس لیٹر کی تمام میں کیا گیا ہے جو پٹیشن اور بنی انسانی حقوق کی خلاف ورزی
میں اس کے خلاف کارروائی چاہی جاتی تھی لیکن منظور رکھتے ہیں
لیکن ہم آپ سے درخواست کرتے ہیں کہ اگر کوئی ڈیپٹیشن کو واپس لیا جائے یا اس میں رٹیم کر کے پرائمری امتداد (Relaxation) دیا جائے اور ان کی
ذمہ داری پرموٹرز لینے کی بجائے ان کو سر میں سے لینے دیا جائے
اور پرموٹرز لینے کی صورت میں باقاعدہ پائل لیا جائے لیکن یہ ذمہ داری کا جائے
اسی سٹیٹ میں آپ سید اہلہ لہم (DEO) کی ای او کہ ایک خصوصی مراحل جاری کیا جائے تاکہ اطلاع میں سب کیل پٹیشن پرائمری امتداد کو دینی
لاہور اور لاہور تک سے ہلایا جائے
کہ کہ ڈیپٹیشن چوکی اسے ہی پرائمری امتداد کو دینی طور پر ہر کے اسے اسلار شروع ہوا ہے
لیکن ہم یہ توقع رکھتے ہیں کہ آپ صاحبان کوئی ایکشن لیں سو یہ ہر کے پرائمری امتداد، خصوصاً لیبل پرائمری امتداد کو اس ذمہ داری سے بہت ملازم کے

شکر ہے
منیر اللہ خان سہیل صدر
آل پرائمری ٹیچرز ایسوسی ایشن خیبر پختونخوا
80/77/83

APTA

N.SL No	O.SL No	Name of Present School	Name	Father's Name	BPS	Acad	Div	Prof	O.O.B	Date of Promotion	D/Appt	PTC Date	TO charge
289	1478	GPS MAIRA AMJAD ALI	AMJAD ALI	MUHAMMAD SIDDIQUE	15	FA		PTC	01/04/1973	28-Feb-15	25/10/1993	25/10/1993	25/10/1993
290	1479	GPS MALKANI	MUHAMMAD SALEEM	MUHAMMAD MISKEEN	15	FA		PTC	01/01/1983	28-Feb-15	25/10/1993	25/10/1993	25/10/1993
291	1480	GPS DHARMANG	UMER FAROOQ	AHMAD NAWAZ	15	MA	2nd	PTC/CT/B.ec	26/04/1971	28-Feb-15	25/10/1993	25/10/1993	25/10/1993
292	1481	GPS CHAN GALI	DELAWAR KHAN	LAL KHAN	15	MA	2nd	PTC/CT/B.ec	07/06/1971	28-Feb-15	25/10/1993	25/10/1993	25/10/1993
293	1484	GPS SOACH	SAL KHEEN	MUHAMMAD ZAMAN	15	FA		PTC	01/01/1972	28-Feb-15	25/10/1993	25/10/1993	25/10/1993
294	1487	GPS DANA MOHIYAN	ALAM ZEB	RAJA AURANG ZEB	15	MA	2nd	PTC/B.ec	22/07/1970	28-Feb-15	27/10/1993	27/10/1993	27/10/1993
295	1489	GPS GHAFUOR JABRI	MUHAMMAD HANIF	MUHAMMAD YOUSIF	15	BA	2nd	PTC/B.ec	01/01/1973	28-Feb-15	27/10/1993	27/10/1993	27/10/1993
296	1491	GPS MURAD ABAD	SAEED UR REHMA	FAZAL UR REHMAN	15	FA		PTC	16/04/1969	28-Feb-15	30/10/1993	30/10/1993	30/10/1993
297	1492	GPS HAFEEZ BANDI	GHAZI KHAN	MUNWAR KHAN	15	BA		PTC/B.ec	10/01/1971	28-Feb-15	30/10/1993	30/10/1993	30/10/1993
298	1505	GPS BADHAN	NISAR AHMAD	KHUSHAL KHAN	15	FA		PTC	01/04/1965	28-Feb-15	25/12/1993	25/12/1993	18/12/1989
299	1508	GPS OCHRI	RESHAM KHAN	AZIZ UR REHMAN	15	FA		PTC	05/04/1985	28-Feb-15	25/12/1993	25/12/1993	27/09/1989
300	1507	GPS LOHAR BANDA NO 2	AMJAD KHURSHID	KHALIL UR REHMAN	15	MA	2nd	PTC/CT/B.ec	01/03/1968	28-Feb-15	25/12/1993	25/12/1993	17/09/1989
301	1513	GPS RAJWAL	ABDUL QAYYUM	BADSHAH KHAN	15	FA		PTC	02/07/1967	28-Feb-15	25/12/1993	25/12/1993	02/09/1988
302	1516	GPS NIKKI MOHRI	MUHAMMAD HUSSAIN	KALA	15	FA		PTC	21/03/1968	28-Feb-15	25/12/1993	25/12/1993	10/11/1989
303	1519	GPS DEED WAR	MUHAMMAD ARIF	JAMAL KHAN	15	FA		PTC	28/04/1968	28-Feb-15	25/12/1993	25/12/1993	17/09/1989
304	1521	GPS GARA DOLA	ABDUL SHAKOOR	MOLVI FAZAL HAQ	15	BA		PTC	14/08/1968	28-Feb-15	25/12/1993	25/12/1993	09/12/1989
305	1521 B	GPS GHORAY PHAIR	MUHAMMAD SADR	MASOOD UR REHMAN	15	BA		PTC	18-07-68	19-Nov-15	25-12-93	25-12-93	15-10-89
306	1524	GPS KHAJKI	MUHAMMAD RAFIQUE	MUHAMMAD AYAM KHAN	15	FA		PTC	15/11/1968	28-Feb-15	25/12/1993	25/12/1993	11/03/1988
307	1525	GPS BAJNA MERA	ASHFAQ AHMED	AFTAB AHMED	15	BA	2nd	PTC/CT/B.ec	01/12/1968	28-Feb-15	25/12/1993	25/12/1993	16/05/1988
308	1532	GPS BADAL GRAN	MANSHA KHAN	BIN YAMSEEN KHAN	15	BA		PTC/CT/B.ec	28/03/1969	28-Feb-15	25/12/1993	25/12/1993	03/01/1989
309	1533	GPS HUNDI ARBAN	KHURSHID ANWAR	GHRJAM DIN	15	BA	2nd	PTC/CT/B.ec	02/04/1969	28-Feb-15	25/12/1993	25/12/1993	03/06/1990
310	1536	GPS JABRI KALISH	MUHAMMAD MISKEEN	SAIN MUHAMMAD	15	FA		PTC	14/11/1969	28-Feb-15	25/12/1993	25/12/1993	01/08/1988
311	1538	GPS KHOLA	INYAT UR REHMAN	SARDAR ASDUR REHMAN	15	FA		PTC	10/03/1970	28-Feb-15	25/12/1993	25/12/1993	17/09/1989
312	1542	GPS BANDI SHUNGLI	NISAR KHAN	ALI BAHADAR	15	FA		PTC	12/12/1970	28-Feb-15	25/12/1993	25/12/1993	17/10/1989
313	1543	GPS SHUNGA	GHULAM HUSSAIN	MIRZA MIAN	15	BA		PTC/B.ec	02/01/1971	28-Feb-15	25/12/1993	25/12/1993	09/10/1989
314	1545	GPS NALLA DADAR	IMTAZ AHMAD	JIA KHAN	15	FA		PTC	15/04/1971	28-Feb-15	25/12/1993	25/12/1993	18/09/1989
316	1551	GPS NOR SUM	MUHAMMAD SADIQUE	RAHIM ULLAH	15	FA		PTC/CT	08/08/1969	28-Feb-15	05/03/1994	05/03/1994	19/10/1989
318	1552	GPS KALWAL	SARDAR BHADAR	FAQIR MUHAMMAD	15	BA	2nd	PTC/CT/B.ec	04/05/1970	28-Feb-15	05/03/1994	05/03/1994	27/11/1989
317	1554	GPS MIANA GALI	JAN MUHAMMAD	MUHAMMAD ZAMAN	15	FA		PTC	01/02/1971	28-Feb-15	05/03/1994	05/03/1994	28/04/1990
318	1555	GPS THAKAR MAIRA	MUHAMMAD SALEEM	ALI AKBAR	15	BA		PTC	14/02/1972	28-Feb-15	05/03/1994	05/03/1994	25/04/1990
319	1585	GPS HOTAR BALA	KHAN BAHADAR	MUSAL KHAN	15	FA		PTC	01/01/1965	28-Feb-15	29/05/1994	29/05/1994	07/08/1990
320	1587	GPS OGH NO.1	MUSHTAQ AHMAD	MULANA WALI MUHAMMAD	15	MA	2nd	PTC/CT/B.ec	12/03/1965	28-Feb-15	25-09-89	28-05-04	25/09/1989
321	1570	GPS BANDA MANOOR	AL FAROOQ	MUHAMMAD ISRIAL	15	FA		PTC	15/08/1968	28-Feb-15	29/05/1994	29/05/1994	17/09/1989
322	1583	GPS BHANGIAN	ABDUR/RASHEED MIAN	KHAN MUHAMMAD MIAN	15	BA	2nd	PTC/CT/B.ec	08/08/1969	28-Feb-15	29/05/1994	29/05/1994	17/09/1989
323	1585	GPS NAZRAL KHAND	DOLAT KHAN	FEROZ SHAH	15	FA		PTC	15/02/1970	28-Feb-15	29/05/1994	29/05/1994	29/09/1989
324	1586	GPS BAGWAI	MUHAMMAD ARIF	FAQIR MUHAMMAD	15	FA		PTC	03/03/1970	28-Feb-15	29/05/1994	29/05/1994	09/08/1990
325	1588	GPS PANDHER	MUHAMMAD ANWAR	KHALIL UR REHMAN	15	FA		PTC	30/03/1970	28-Feb-15	29/05/1994	29/05/1994	02/08/1990
326	1591	GPS SUFAIDA PAAEN	BADRI ZAMAN	GHULAM JAN	15	FA		PTC	04/04/1970	28-Feb-15	29/05/1994	29/05/1994	24/08/1989
327	1592	GPS KHAKI	MUHAMMAD ARIF	MUHAMMAD IRFAN	15	MA	2nd	PTC/CT/B.ec	20/04/1970	28-Feb-15	29/05/1994	29/05/1994	12/05/1990
328	1593	GPS DOOD KOT	DILDAR MUHAMMAD	FAQIR MUHAMMAD	15	FA		PTC	01/05/1970	28-Feb-15	29/05/1994	29/05/1994	29/05/1990
329	1596	GPS MANDI	GHULAM NABI	MUHAMMAD YAQUB	15	BA	2nd	PTC/CT	08/03/1971	28-Feb-15	29/05/1994	29/05/1994	17/09/1989
330	1597	GPS SATBANI	MUMTAZ HUSSAIN	AURANGZEB	15	MA	2nd	PTC/B.ec	09/03/1971	28-Feb-15	29/05/1994	29/05/1994	01/08/1990
331	1600	GPS CHAMB	MEHBOOB KHAN	HABAB KHAN	15	FA		PTC	08/05/1971	28-Feb-15	29/05/1994	29/05/1994	01/08/1990
332	1603	GPS GALLIAN	ALI REHMAN	NOOR AHMED	15	FA		PTC	24/02/1985	28-Feb-15	10/07/1994	10/07/1994	29/04/1990
333	1607	GPS SALDHAR NO.1	WAJID RAZA	MUHAMMAD RAZA	15	FA		PTC	05/03/1987	28-Feb-15	13/11/1994	13/11/1994	13/11/1994
334	1609	GPS KALGAN	ARSHID NASEEM	M NASEEM KHAN	15	BA	2nd	PTC/CT/B.ec	29/08/1973	28-Feb-15	13/11/1994	13/11/1994	13/11/1994
335	1610	GPS TARWAI	MUHAMMAD FAYYAZ KHAN	AFTAR KHAN	15	FA		PTC	01/04/1973	28-Feb-15	13/11/1994	13/11/1994	13/11/1994
336	1611	GPS BAILA TANDA	HABIB UR REHMAN	KHALIL UR REHMAN	15	FA		PTC	03/04/1975	28-Feb-15	13/11/1994	13/11/1994	13/11/1994



PAKISTAN COURT FEE

DBA

Supra

Alta

الشركة العامة للصناعات الكيماوية

بغداد

14.02.80

Handwritten signature and stamp

(25)

DBAM No. 338
BC No. 10-2457
Name of Advocate طاہر ساجد

S.No 53754
Fee Rs. 200/-



2024-25 CTARY
District Bar Association
Manshera

وکالت نامہ

بعدالت: سروس ٹریسینگ KPK لپڈاوم
عنوان: اشفاق احمد بنام: سیکورٹی آف ٹورنٹس آف KPK
منجاب: ایسٹرنڈ نوعیت مقدمہ: سروس لپڈاوم

باعث تحریر آنکہ

دریں مقدمہ عنوان بالا میں اپنی طرف سے برائے پیروی و جواب دہی بہ مقام (ایسٹرنڈ) با نام کے لئے
طاہر ساجد لپڈاوم کو مقرر کیا گیا 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 کاروبیہ وصول
کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپر ڈٹاشی و راضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار بھی ہوگا
بصورت اپیل و برآمدگی مقدمہ یا منسوفی ڈگری کی طرف درخواست حکم امتناعی یا فیصلہ قبل از ڈگری اجراء ڈگری بھی وکیل موصوف
کو بشرط ادا تکلیف علیحدہ محتاتنا ادا کرنے کا مجاز ہوگا اور بصورت ضرورت بدوراں مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا پیرسٹر 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 سندر ہے۔ مضمون وکالت نامہ من لیا ہے اور اچھی طرح سمجھ لیا ہے۔

اشفاق احمد ولد الطاف احمد سکے نمبر مالک وکیل
19/10/2024

مورخہ 19 اکتوبر 2024ء

منہ
ACCEPTED