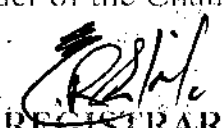


# FORM OF ORDER SHEET

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

Appeal No. 1975/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/10/2024	<p>The appeal presented today by Mr. Muhammad Muazzam Butt Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 23.10.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA

A. NO. 1975/2024  
MUHAMMAD SHOAIB  
V/S

Government of KP & others

INDEX

S#	DESCRIPTION OF THE DOCUMENTS	ANNEX	PAGES
1.	Appeal and Verification	*	1-4
2.	Application for suspension	*	5
3.	Copy of Monthly Salary account	A.	6 - 8
4.	Copy of notification No. SD-(Policy) EV AD/1-3/2020 dated 06/08/2020	B.	9 - 10
5.	Copy of Impugned Letter dated June 06th, 2023	C.	11 - 13
6.	Copy of Minutes of Meeting dated 06-07-2023	D.	14 - 17
7.	Copy of Letter dated 23-08-2023	E.	28 - 29
8.	Copy of Impugned letter dated 07-09-2023	F.	20 - 21
9.	Copy of Representation against the said notification and representation made by APTA President	G & H	22, 23 24
10.	Wakalat Nama		25

ADVOCATE  
M. Muazzam Butt

-9-

Page | 1.

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA**

In Ref to

Service Appeal No. 1975/2024

Muhammad Shoaib son of Muhammad Zaman, PSHT (BPS-15)

PO Gabasni, satkatir, Tehsil Topi, district Swabi

.....Appellant

VERSUS

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

.....Respondents

**SERVICE APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT 1974. AGAINST THE IMPUGNED NOTIFICATION BEARING NO.SO(POLICY)E&AD/1-3/2020, DATED 06/08/2020. COMMUNICATED TO RESPONDENT NO. 2 VIDE LETTER DATED 06/06/2023. WHEREIN IT WAS STATED THAT SUB RULE 5 OF RULE 7 OF KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION AND TRANSFER) RULES, 1989 STANDS DELETED**

PRAYER:

**ON ACCEPTANCE OF INSTANT SERVICE APPEAL, THE IMPUGNED NOTIFICATION BEARING NO: SO (POLICY) E&AD/1-3/2020, DATED 06/08/2020, COMMUNICATED TO RESPONDENT NO. 2 VIDE LETTER DATED 06/06/2023, MAY BE DECLARED AND ORDERED TO BE STRUCK DOWN BEING VOID AND ULTRA VIRES TO THE CONSTITUTION OF PAKISTAN AND FUNDAMENTAL PRINCIPLES OF NATURAL JUSTICE AND AGAINST THE RIGHTS OF APPELLANT,**

**ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEMS FIT AND PROPER IN THE CIRCUMSTANCES OF THE CASE MAY ALSO BE GRANTED TO THE APPELLANT,**

RESPECTFULLY SHEWETH:

1. That the Respondents Department appointed the Appellant as Primary School Head Teacher.  
Copy of Appointment letter is annexed as Annexure A

2. That as per Khyber Pakhtunkhwa (Appointment/ Promotion/ Transfer) Rules, 1989, as well as in other sister services of the other Provinces and Federation as well, availing of promotion by the employees is always optional and the employees as a matter of right may avail or forego their promotion and the next employee in seniority list is to be promoted.
3. That some employees specifically have foregone their promotion as they could not serve in the areas where there is no facility of accommodation and no houses of their elders are available to look after them in far-flung and solitary mountainous hard areas, and as per Section 25 of per KP Civil Servant Act, 1973, rules to the extent of terms and condition is framed by the Chief Minister and such promotion rules are not made applicable with retrospective effect. The rules framed are published in the Gazette notification and part and parcel of KP Civil Servant Appointment, Transfer and Promotion Rules 1989.
4. That Government of K.P without following the rules position mentioned in Para 6 above promulgated Notification No. SO (Policy) E&AD/1 3/2020, dated 06/08/2020, communicated to Respondent No.2 vide letter dated 06/06/23 wherein it has been made mandatory to the employees to avail the promotion, otherwise, disciplinary action shall be taken against the employees. The impugned Notification is reproduced as under:

"Furthermore, those officers/officials who do not comply with promotion order of the competent authority or try to evade promotion through different means shall be proceeded against under Khyber Pakhtunkhwa Civil Servants (Efficiency Discipline) Rules, 2011, please".
5. That as per notification No. SD (Policy) /EDAD/1- 3/2020 dated 06/08/2020, the right of foregoing of promotion was withdrawn and the Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) deleted Rule 7(5) in the Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 vide notification no SOR-VI (E & AD)/1-2/2020 dated 06-08-2020. Copy of Impugned notification No. SD (Policy) EV AD/1- 3/2020 dated 06/08/2020 is attached as Annexure B
6. That the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar asked for guidance regarding deletion of Rule 7(5) in Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 in respect of which the respondent No. 1 vide its letter No. SO(Policy) E&AD/1-3/2020 dated Peshawar the June 06th, 2023 directed the respondent No 3 (Directorate of Elementary & Secondary Education) that Rule 7(5) in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 has been deleted vide notification dated 06-08-2020 and therefore, no provision exists to decline or forego promotion and it is obligatory upon every civil servant to accept promotion under every condition. Copy of Impugned Letter dated June 06th, 2023 is attached as Annexure C
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 & 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 Rule/2023 dated 23-08-2023 to reconsider the amendment made in Khyber

Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 as it had negatively affected a large number of teachers and especially female teachers. Copy of letter dated 23-08-2023 is attached as Annexure E

9. That the respondent vide its letter dated 07th of September 2023 directed the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa that necessary guidance has already been provided to the department and therefore no provision exists to decline or forgo promotion and those teachers who do not comply with the promotion order of the competent authority or try to evade promotion through different means shall be proceeded under the Khyber Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules, 2011.

Copy of impugned letter dated 07-09-2023 is attached as Annexure F

10. That the petitioner feeling aggrieved, filed Representation to the respondents in person, and also approached to respondents through APTA President but the grievance 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 letters dated 06-06-2023 and 07-09-2023 and the deletion of Rule 7(5) in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989; the petitioners filed this Hence, the instant service appeal is filed on the following grounds:-

**GROUNDS:-**

a. That as per various judgments it is established and settled principle that executive notifications cannot be given retrospective effect. A valid Notification which confers rights is always applicable with prospective effect; however, if an amendment notification that adversely affects the interests of the employees or causes disadvantage 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 employees in the past, have foregone their promotion along with their posting. It is submitted that when domestic and other personal issues do not permit the employees/appellant to avail the promotion order and in that case, the employees who foregone their promotion were allowed not to avail the promotion for a period of 04 years and on second refusal the employees were permanently debarred from availing the facility of promotion during their entire service. Hence the employees himself/herself forebear agonies of foregoing their promotions. As a result, junior to the appellant according to the order of seniority cum fitness are granted promotion to next rank.

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 be set-aside.

d. That it is further submitted that on account of grant of promotion, some employees who are suffering from severe medical ailment or facing acute domestic issues, cannot avail promotion with transfer in other areas, therefore, no employee can be compelled to accept the promotion compulsorily which is not beneficial to the employee but if an employee does not avail and get benefit of her promotion it must be optional for the employees as to whether to avail or forego the benefits. Any 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 for 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 children as well as ailing dependent family members and in these circumstances in the presence of impugned Notification dated 06/08 /2023 communicated on 06/06/23 would not be able to serve in the department and which shall amount to the snatching of bread and butter of the poor employees.

It is, therefore, humbly prayed that on the acceptance of the instant Service Appeal; the impugned Notification bearing No. SO (POLICY) E&D/1-3/2020 DATED 06/08/2020, communicated to Respondent No.2 by Respondent NO:1, vide letter dated 06/06/2023, may please be declared and ordered to be struck down being Void, Ultra vires to the Constitution of Pakistan and against the fundamental principles of natural justice.

It is further prayed that no penal action as proposed and envisaged in letter dated 06/06/2023 may be declared as unlawful, illegal and without having any legal effect.

Any other relief, which this honorable Tribunal deems fit and proper in the circumstances of the case, may also be granted to the appellant.

**AFFIDAVIT:**  
 I, (the appellant) solemnly declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.  
 Deponent

*[Signature]*  
 Appellant

Through

*[Signature]*  
 Muhammad Muazzam Butt  
 Advocate Supreme Court

*[Signature]*  
 Muhammad Adeel Butt  
 Advocate High Court

*[Signature]*  
 Bassam Ahmad Siddiqui  
 Advocate High Court  
 LL.M- Human Rights

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA**

C.M No \_\_\_\_\_-P of 2024

In Ref to

Service Appeal No \_\_\_\_\_ 2024

Muhammad Shoaib

**VERSUS**

Secretary to Government of Khyber Pakhtunkhwa, & others

**APPLICATION FOR SUSPENSION OF IMPUGNED NOTIFICATION BEARING NO. SO (POLICY) E&D/1-3/2020 DATED 06/08/2020, COMMUNICATED TO RESPONDENT NO.2 BY RESPONDENT NO.1; VIDE LETTER DATED 06/06/2023 TILL THE FINAL DISPOSAL OF CASE IN HAND.**

Respectfully Submitted:-

1. That the instant application may be treated as part and parcel of service appeal of the appellant.
2. That the appellant has brought a good prima facie case and balance of convenience also lies in favor of the appellant.
3. That there is likelihood success of the appellant in the lis. And if the notification bearing No. So (Policy) E&D/1-3/2020 Dated 06/08/2020, communicated to Respondent No.2 by Respondent No.1, Vide Letter Dated 06/06/2023 is not suspended the appellant would suffer irreparable loss.
4. That valuable rights of the appellant is involved in the case.

In view of the reasons, It is humbly requested that the notification bearing No. So (Policy) E&D/1-3/2020 dated 06/08/2020, communicated to Respondent No.2 by Respondent No.1, Vide Letter Dated 06/06/2023 may kindly be suspended till the final disposal of the main appeal in hand.

*Muhammad Shoaib*  
Appellant

Through

*Muhammad Muazzam Butt*  
Muhammad Muazzam Butt  
Advocate Supreme Court

*Muhammad Adeel Butt*  
Muhammad Adeel Butt  
Advocate High Court

**AFFIDAVIT**

I (the appellant) do hereby solemnly stated on oath that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein this Honorable Court.

*Muhammad Shoaib*  
Deponent

District Accounts Office Swabi  
Monthly Salary Statement (July-2024)

-6-



Personal Information of Mr MUHAMMAD SHOAIB d/w/o of MUHAMMAD ZAMAN  
 Personnel Number: 00235900 CNIC: 1620208920511 NTN: 0  
 Date of Birth: 04.03.1972 Entry Into Govt. Service: 31.05.1994 Length of Service: 30 Years 02 Months 002 Days

Employment Category: Active Permanent  
 Designation: PRIMARY SCHOOL HEAD TEACH 80004631-DISTRICT GOVERNMENT KHYBE  
 DDO Code: SU8238-Government Primary Schools (Male) Topi, Swabi  
 Payroll Section: 003 GPF Section: 001 Cash Center: 03  
 GPF A/C No: EDUSB 02378 GPF Interest applied GPF Balance: 1,047,074.00 (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	2,858.00	1300 Medical Allowance	1,500.00
1505 Charge Allowance	40.00	1823 UAA-OTHER 20%(1-15)	1,000.00
2148 15% Adhoc Relief All-2013	888.00	2189 Adhoc Relief Allow @10%	614.00
2318 Teaching Allowance 2021	3,224.00	2341 Dispr. Red All 15% 2022KP	8,807.00
2347 Adhoc Rel Al 15% 22(PS17)	8,807.00	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	-1,290.00	3501 Benevolent Fund	-1,200.00
3800 Income Tax	-0,473.00	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

**Deductions - Income Tax**

Payable: 103,567.85 Recovered (till JUL-2024): 6,473.00 Exempted: 25891.87 Recoverable: 71,202.78

Gross Pay (Rs.): 140,871.00 Deductions: (Rs.): -12,898.00 Net Pay: (Rs.): 128,173.00

Payee Name: MUHAMMAD SHOAIB  
 Account Number: 7060-9  
 Bank Details: NATIONAL BANK OF PAKISTAN, 230503 TOPI BRANCH TOPI BRANCH, SWABI

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address: VILL AND PO SATKETR SWABI

City: SWABI

Domestic: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: muhammadshoaibspst@gmail.com

System generated document in accordance with APPM 4.8.12.9(232428/26.07.2024/v3.0)

All amounts are in Pak Rupees

Errors & omissions excepted (SERVICES/01.08.2024/21;03;18)

**ATTESTED**



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PRIMARY SWABI  
 APPOINTMENT OFFICE ORDER

In compliance with the Government of N.W.F.P. Education Department No.30(PB)6-1/91 of dated 2.3.1992, relating to new recruitment policy for the appointment of PTO teachers under para No.I Sub:Para(i) i.e. "Recruitment of PTO teachers under the new recruitment policy shall be strictly on the basis of merit and only PTO trained persons will be recruited for vacancies within a provincial constituency from among candidates belonging to that constituency"

Consequent upon the interview for the appointment of PTO trained teachers held on 25.5.1994, the following appointments of trained PTO candidates in respect of Constituency No. FF-25 Swabi-II are hereby ordered in RFS-7 (Rs. 1095-60-1995) plus usual allowances with effect from the date of taking over charge, purely on merit basis and strictly in accordance with the prescribed Rules and Regulations and the instructions of the concerned authorities on the terms and conditions given on the last page

S. No.	Name & Parentage & Address	Qual.	Mark	Name of place appointed	Remarks
1.	Mohammad Zubair s/o Ibrahim Khan V&PO Utla	---	748	GPS Dhoro Sandow	AVP
2.	Jehan Zeb Khan s/o Muzaffar Khan V&PO Amria Payan	---do---	741	GPS Talai	AVP
3.	Mohammad Rehman s/o Abdul Hameed V&PO Bori/Gabasni	---do---	734	GPS Talai	AVP
4.	Ashfaq Ali s/i Ghulam Akbar V&PO Kalabat	---do---	714	GMPS Baja Jaba	NOP
5.	Babir Rehman s/o Wasir Rehman V&PO Topi	---do---	707	GPS No. 4 Topi	AVP
6.	Mohammad Shuaib s/o Mohammad Zaman V&PO datkitar	---do---	706	GPS Naagband	AVP
7.	Fazlur Rab s/o Fazli Mola V&PO Kalabat	---do---	705	GPS Pontia	AVP
8.	Fazli Khaliq s/o Abdul Ahmed V&PO Bam Khal	---do---	704	GMPS Bam Khal	NOP
9.	Mohammad Zahid s/o Mohammad Rauf V&PO Kalabat	---do---	694	GPS No.2 Topi	AVP
10.	Sikandar Zeb s/o Ghulam Akbar V&PO Kalabat	---do---	677	GMPS Baja	NOP
11.	Jehan Zeb s/o Mohammad V&PO Topi	---do---	664	GPS Gala	AVP
12.	Midrarul Haq s/o Saeedur Rehman V&PO Kotha	---do---	659	GMPS Tashqand Boga	AVP
13.	Jamil Khan s/o Wasil Khan V&PO Kalabat	---do---	650	GMPS Malak Abad	NOP
14.	Mirza Ali Khan s/o Mir Alam Khan V&PO Pabaini	---do---	641	GPS Kankani Jhanda	AVP
15.	Zain Mohammad s/o Niaz Mohammad V&PO Kalabat	---do---	612	GPS No.2 Topi	AVP

Dy. District Education Officer (Male) Primary Swabi

Continued on the last page

19/5/94

ATTACHED

- 8-
- without assigning any reason and without any prior notice.
2. They will have to produce the following certificates:-
    1. Medical certificate of physical fitness from the MB, HQ Hospital Swabi.
    11. Verification of antecedents by the DSP Swabi/Lahor.
    3. They should not be handed over charge if their Age is below 18 or above 25 years.
    4. They must take over charge of the post within 14 days of the issue of this order thereafter the appointment will stand cancelled.
    5. In case of resignation they will have to submit 14 days prior notice. After tendering resignation, they will not leave their jobs until the acceptance of their resignations by the competent authority nor shall they be granted any leave. In case they leave their jobs without the acceptance of their resignations they will be treated as absentees and disciplinary action will be initiated against them.
    6. The SDEOs/ASDEOs must check and verify their original documents. If any forgery is detected the case be registered with the Police for legal action. The SDEOs/ASDEOs will be held responsible for any lapse in this regard.
    7. Charge report should be submitted to all concerned.
    8. No TA/DA/TS is allowed.
    9. The following undertaking must be obtained from the candidates and be placed in their service books.
      - a. I understand that my employment under Government is temporary and that my service may be terminated by Government at any time, without assigning any reason, by giving a notice for a period not less than 14 days or payment in lieu of the notice, of a sum equivalent to my pay for 14 days or Cx for the period by which the notice falls short of 14 days.
      - b. I agree that if I wish to terminate my services under Government at any time, I shall resign in writing and shall thereafter continue to serve until my resignation is accepted.
      - c. I also understand that if I absent myself from duty without resigning in writing or before the acceptance by Government of my resignation, I shall be liable to disciplinary action, which may involve dis-qualification from future employment under Government.

( JAMALDAS KHAN )  
 DISTRICT EDUCATION OFFICER  
 (MALE) PRIMARY SWABI

Order No: 2451-G / F.No.34/Vol-IV/PR Appdt./Dated 29.5.1994

- Copies forwarded to the:-
1. Additional Director-D Directorate of Prg Education NAFB Hayat Abad Peshawar.
  2. District Accounts Officer Swabi.
  3. DSP Swabi and Lahor with reference to the to S.No.2 SubPara (ii) above.
  5. Medical Superintendent HQ Hospital Swabi with reference to S.No.2 subPara (i) above.
  - 6-7. Sub-Divisional Education Officers (M) Swabi & Lahor.
  8. Superintendent Local Office.
  9. Head Teachers of concerned schools.
  10. Candidates concerned.

F. RAHMAN

DISTRICT EDUCATION OFFICER  
 (M) PRIMARY SWABI.

ATTESTED

ATTESTED

ATTESTED



DEPUTY SECRETARY POLICY  
(W/ADVAH LATTI)

*[Handwritten signature]*

- 1. Additional Chief Secretary, Govt. of Khyber Pakhtunkhwa, Planning & Development Department, Khyber Pakhtunkhwa.
- 2. The Senior Member Board of Revenue, Khyber Pakhtunkhwa.
- 3. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
- 4. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
- 5. The Principal Secretary to Government, 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, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
- 11. The Registrar, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
- 12. The Deputy Director (IT), E&A Department.
- 13. The Section Officer (Admin), Administration Department.
- 14. The Section Officer (Admin), Administration Department.
- 15. The Section Officer (Admin), Administration Department.
- 16. The Section Officer (Admin), Administration Department.
- 17. The Section Officer (Admin), Administration Department.
- 18. The Section Officer (Admin), Administration Department.
- 19. The Section Officer (Admin), Administration Department.
- 20. The Section Officer (Admin), Administration Department.

CHIEF SECRETARY  
GOVERNMENT OF THE KHAYDER PAKHTUNKHWA

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

NOTIFICATION  
In exercise of the powers conferred by section 26 of the  
Khyber Pakhtunkhwa Civil Servants Act No. XVII of  
1973 (Khyber Pakhtunkhwa) is directed that in the Khyber  
Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the  
amendment shall be made, namely:  
The further amendment shall be made, namely:

GOVERNMENT OF  
KHAYDER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
REGISTRATION WING

Annexure - B

-10-

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

**ATTESTED**

OFFICE OF THE CLERK OF THE SUPREME COURT OF JUSTICES

Deputy Clerk (Policy)

Deputy Clerk (Policy)

Yours faithfully,

1. PS to Deputy Secretary (Policy), Presidential Department.  
2. PS to Additional Secretary (Policy), Presidential Department.  
3. PS to Deputy Secretary (Policy), Presidential Department.

Copy forwarded to the  
Hon. P. Gov. N. A. A. (Policy)

ASST  
2/16

1011, please

Participants, data officers/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 Service (Miscellaneous & Disabling Rules), 1989. It is obligatory upon every

The holder candidate should be advised of the date of the bid rate is almost in preventing a

1. The holder candidate should be advised of the date of the bid rate is almost in preventing a

2. The holder candidate should be advised of the date of the bid rate is almost in preventing a

3. The holder candidate should be advised of the date of the bid rate is almost in preventing a

Subject: TRANSFERS OF CIVIL SERVANTS OF THE GOVERNMENT OF KHYBER PAKHTUNKHWA

The Government of Khyber Pakhtunkhwa  
Ministry of Secondary Education Department



GOVERNMENT OF KHYBER PAKHTUNKHWA  
MINISTRY OF SECONDARY EDUCATION  
No. SO-P/Secy/MA/11/2020  
dated Peshawar the 06th June, 2023.

67

Annexure - C

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
CIVIL SECRETARIAT PESHAWAR  
(Phone No.091-8221587)

Mn.60 (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

*[Handwritten Signature]*  
26/6/23

Subject: GUIDANCE REGARDING DELETION OF RULE 7(6) 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 herewith  
a letter of Establishment Department letter No. SO (Policy)ESAD/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 ISHAQ)  
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)  
26/6/23

~~TESTED~~

-13-  
B/c

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(S) 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/1-3/2023 dated 06 June, 2023 and to state  
that the subject meeting is to be held on 05 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 MALI)

Copy forwarded to the

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

SECTION OFFICER (PRIMARY MALI)

~~ATTACHED~~

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.


Annexure  
0


Slr	NAME	DESIGNATION
1	Mr. Fazal Waheed	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

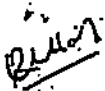
2. The meeting started with recitation from The Holy Quran. The chair welcomed the participants. The Deputy Director (Establishment) of Directorate of Elementary & Secondary Education briefed the forum regarding agenda item in detail.

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 Waheed)  
Deputy Director-1  
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

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

  
**ATTESTED**



-15-  
-B/C-

**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 No	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

~~RESTRICTED~~

WORLDWIDE 2023 AZIZULHAQ VS GOVT OF PAK

Harshad Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

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

Please. The case is submitted for perusal and necessary action.

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

consolidated case. In view of the above, this office has been asked for submission of report of his office. This office has been asked for submission of

That in light of the minutes of the meeting dated 6-07-2023 held under the chairmanship of Hon. Additional Secretary Education, no provision to decline / forgo promotion, etc. is obligatory upon every civil servant to accept promotion under any condition.

That the government of KP-ED (Registration Wing) vide letter No. SO (Regd) EQAD/1-3/2020 dated 6-06-2023 accordingly stated that there exists no provision to decline / forgo promotion, etc. is obligatory upon every civil servant to accept promotion under any condition.

That your good office forwarded the same to quonies concerned vide letter No. SO (Promo) EQAD/2-1/Appointment-2023 for necessary guidance.

That this office sought guidance from your good office in the following vide notification No. SO SR-VI (EQAD) 1-3/2020 dated 06-08-2020.

That Government of KP Establishment department (Registration Wing) dated rule 7(S) in Civil Servants (Appointment) Rules 1997 (as amended) present being history, about background of case as under:

Minister of meeting EQAD/1-3/2020 dated 10-7-2023 on subject cited above and to Dear Sir, I am directed to refer to letter No. SO (Promo) EQAD/1-3/2020/

Suggested: Minutes of Meeting  
KPK, Peshawar  
Elementary & Secondary Education Department  
Section Officer (Promo-Male)

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

-B/C-  
-16-

**ATTESTED**

WP 1462-2023 AZIZULLAH VS GOVT CP PGO

Assistant Director (Ex-11)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

Assistant Director (Ex-11)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa  
17/11/2023

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

Copy of the above is in:-  
Encls. No. \_\_\_\_\_

The case is submitted for perusal and necessary actions please.

Departmental / Revision Committee.  
provided they submit their written report to the meeting of the meeting of  
Teachers Union. It may be extended if implications of the meeting of the  
75) have affected negatively a huge number of Female Teachers. That it is proposed that  
in view of the above, the office is of considered opinion that the decision of Rules  
be kept in force for the time being. The office is of considered opinion that the  
Chairman of the Khyber Pakhtunkhwa Education Board should be directed to  
That in the light of the order of meeting dated 6-07-2023 held under the  
(Primary-4) 545507-2/19/2023 dated 13-05-2023.  
The same was received by the office from your good office with letter No.50  
civil revision (accept provision) under every condition.  
that there shall be no provision to decide or forgo provision. It is obligatory upon every  
(Wing) who letter No.50 (Policy) 545507-2/19/2023 dated 6-05-2023 categorically read  
That the Government of Khyber Pakhtunkhwa Education Department (Regulation  
No.50 (Policy-4) 545507-2/19/2023 for teachers' guidance.  
That your letter forwarded the same to the quarter concerned with letter  
provision.  
(ii) It is the responsibility of the civil revision in either accept or turn down the offer of  
(i) Now it is obligatory upon the civil revision in every condition.  
No.0987 dated 04-02-2023.  
That the office should grant guidance from your good office in the following words with letter  
with notification No. 508-VI (EADVI)-1/2020 dated 06-08-2020.  
dated with 70, in the Civil Service (Appointment) provision & Transfer Rules (1949)  
That Government of Khyber Pakhtunkhwa Education Department (Regulation (Wing)  
provision & Transfer Rules (1949) in the Civil Service (Appointment) provision & Transfer Rules (1949)

I am directed to refer to the letter No.50 (Primary-4) 545507-2/19/2023 dated 10-07-2023 on the subject cited above and to  
present brief history about the background of the case as under:

Subject - **MURTI OF THE AIRLIFTING**  
Khyber Pakhtunkhwa Education Department  
The Section Officer (Primary-4),  
Khyber Pakhtunkhwa Education Department



No. 8145  
Date: 17/11/2023  
Email: [education@kpk.gov.pk](mailto:education@kpk.gov.pk)

ATTESSED

APR 2023 AZULAH VS GOVT OF PAK

Scanned with CamScanner

SECTION OFFICER (PRIMARY SCHOOLS)  
26/8/23

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

Copy forwarded to the:

SECTION OFFICER (PRIMARY SCHOOLS)  
BAHAWALNUR (S&D)

3. In view of the above, the said amendment may be reconsidered to the extent of (a) teacher in primary schools.  
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 or mother-in-law who need care. In such cases, there are negative effects on service delivery.  
I am directed to refer to your letter No. SO(Policy)/EKAD/1-3/2020 dated 06 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 do not proceed through different means shall be proceed under Khyber Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules, 2011.

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

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

No. SO(Policy-M)/EKSE/2-2/Appointment-Rule /2023  
Peshawar Dated 23rd August, 2023

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

Annexure  
E

ATTESTED

1. Director E.G.S.E. Kyba Pashankhwa  
2. PS to Secretary, E.G.S.E. Department of Kyba Pashankhwa  
(Muzammad Ishaq)  
Section Officer (Personnel)  
(Note)

Copy forwarded to:  
In view of above, the said amendment may be reconsidered to the extent of body teacher in primary schools.  
Mother-in-law who need care in such cases there are negative effects on service delivery.  
Most of them are married with kids and elder father of In the remotest stations with no residential/transport facilities face serious inconvenience while they have to perform duties teacher of primary level who avail such promotion have to In this connection it is submitted that in some cases body 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. 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 body teacher in primary schools.

Dear Sir,  
Civil Servant (Efficiency and Discipline) Rules 2012.  
Civil Servant (Appointment, Promotion & Transfer Rules 1989)

SUBJECT: Guidance regarding deletion of Rule 7(5) in the Civil Servant (Appointment, Promotion & Transfer Rules 1989)

The Secretary to Government of Kyba Pashankhwa, Establishment and Administration Department, Peshawar.

To  
No. 5 (Personnel - M) E.G.S.E.D. 18.9.21  
Department - Rule 2023  
Peshawar Dated 22nd August, 2023

-8/c-  
-19-

Annexure - F



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

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

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

Dear Sir,  
I am directed to refer to your letter No. SO(Primary-M)/E&SED/2-  
2/Appointment-Rule/2023 dated 23.08.2023 on the subject noted above and to state that  
necessary guidance has already been 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.

ATTESTED

10/09/2023 12:10:10 PM GOVT OF PK

-21-

B/c-

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,  
Primary & 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 03.08.2023 on the subject noted above and to state that necessary  
guidance has already been tendered to your good office vide this department letter of even  
No. dated 06.06.2023 (copy enclosed).

Yours faithfully,

Section Officer (Policy)

Encl. Of even No & date

Copy forwarded to the:-

1. PS to Special Secretary (Reg), Establishment Department.
2. PA to Additional Secretary (Reg-10), Establishment Department.
3. PS to Deputy Secretary (Policy), Establishment Department.

Section Officer (Policy)

~~ATTESTED~~

Annexure - G

To,

- 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

**Subject: REPRESENTATION AGAINST THE IMPUGNED NOTIFICATION BEARING NO.SO(POLICY)E&AD/1-3/2020, DATED 06/08/2020, COMMUNICATED TO SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA, ELEMENTARY & SECONDARY EDUCATION DEPARTMENT VIDE LETTER D06/06/2023, WHEREIN IT WAS STATED THAT SUB RULE 5 OF RULE 7 OF KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION AND TRANSFER) RULES, 1989 STANDS DELETED**

Sir/Madam:-

Your Honorable authority promulgated Notification No. SO (Policy) E&AD/1-3/2020, dated 06/08/2020, communicated to Elementary & Secondary Education vide letter dated 06/06/23 wherein it has been made mandatory to the employees to avail the promotion, otherwise, disciplinary action shall be taken against the employees. 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 Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 vide notification no SOR-VI (E & AD)/1-2/2020 dated 06-08-2020. That the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar asked for guidance regarding deletion of Rule 7(5) in Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 in respect of which the Establishment Department vide its letter No. SO.(Policy) E&AD/1-3/2020 dated Peshawar the June 06th, 2023 directed the Directorate of Elementary & Secondary Education that Rule 7(5) in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 has been deleted vide notification dated 06-08-2020 and, therefore, no provision exists to decline or forgo promotion and it is obligatory upon every civil servant to accept promotion under every condition. That Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa also wrote a letter to the office of Establishment & Administrative Department vide No. SO(Primary-M) E&SED/2-2/Appointment Rule/2023, dated 23-08-2023 to reconsider the amendment made in Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 as it had negatively affected a large number of teachers and especially female teachers. In the meanwhile, the department vide its letter dated 07th of September 2023 directed the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa that necessary guidance has already been provided to the department and therefore no provision exists to decline or forgo promotion and those teachers who do not comply with the promotion order of the competent authority or try to evade promotion through different means shall be proceeded under the Khyber Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules, 2011.

It is, therefore, humbly prayed that on the acceptance of the instant representation; the Notification bearing No. SO (POLICY) E&D/1-3 1-2020 DATED 06/08/2020, communicated to 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.

Dated 20/08/2024

*Q. Shoaib*

MUHAMMAD SHOAB

S/O MUHAMMAD ZAMAN

PSHT



23

APTA Cyber Pakhnutimikawa



President  
0333-9416648  
0333-9400187  
0333-9400187  
0333-9400187

APTA Huzari  
Govt. Primary School Nawa  
Gubshar Peshawar City

اطلس پرائمری پشاور الیونیرٹیون (اپٹا) ضمیمہ یکم ضمیمہ اول

Annexure - H

جسٹس مسٹر جلیان خان شاد پشاور ہائیکورٹ  
محکمہ اطلاعات و پبلسٹیٹی

محکمہ اطلاعات و پبلسٹیٹی کے ذریعہ پشاور ہائیکورٹ کے جج مسٹر جلیان خان شاد نے اپنے ایک فیصلے کے تحت ایک پریس کانفرنس منعقد کی۔ اس دوران ان کے پاس ایک دستاویز پیش کی گئی جس میں ایک پریس کانفرنس منعقد کرنے کے بارے میں درخواست کی گئی تھی۔ جس میں ایک پریس کانفرنس منعقد کرنے کے بارے میں درخواست کی گئی تھی۔

ان کے پاس ایک دستاویز پیش کی گئی جس میں ایک پریس کانفرنس منعقد کرنے کے بارے میں درخواست کی گئی تھی۔ جس میں ایک پریس کانفرنس منعقد کرنے کے بارے میں درخواست کی گئی تھی۔

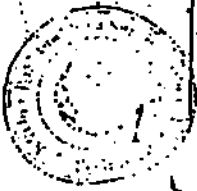
ان کے پاس ایک دستاویز پیش کی گئی جس میں ایک پریس کانفرنس منعقد کرنے کے بارے میں درخواست کی گئی تھی۔ جس میں ایک پریس کانفرنس منعقد کرنے کے بارے میں درخواست کی گئی تھی۔

ان کے پاس ایک دستاویز پیش کی گئی جس میں ایک پریس کانفرنس منعقد کرنے کے بارے میں درخواست کی گئی تھی۔ جس میں ایک پریس کانفرنس منعقد کرنے کے بارے میں درخواست کی گئی تھی۔

Handwritten signature and name: شاد جلیان خان

ATTESTED

07.05.2024



1. Learned counsel for the appellant present.

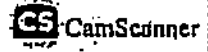
2. Let a pre-submission notice be issued to the respondents through TCS for submission of reply/comments. Appellant is directed to deposit TCS expenses within three days. To come up for reply/comments as well as preliminary hearing on 10.06.2024 before S.D. P.P given to learned counsel for the appellant.

03. Alongwith the service appeal there is an application for suspension of Notification dated 06.06.2023 and letter dated 23.08.2023 till the final disposal of main service appeal. In the meanwhile, no adverse action shall be taken against the appellant till next date of hearing.

Certified to be true copy (Muhammad Akbar Khan)  
Member (A)

*[Handwritten signature]*  
13/5/24

Date of Presentation of Application 10-5-24  
Number of 1  
Copies 1  
Urgent 1  
Total 1  
Name of 1  
Date of 10-5-24  
Date of delivery of copy 17-5-24



~~ATTACHED~~

# VAKALAT NAMA

## BEFORE THE SERVICE TRIBUNAL PESHAWAR

MUHAMMAD SHOAIB

Appellant

Versus

Government of KP & others

Respondents

I (the Appellant)

do hereby appoint and retain

MUHAMMAD MUAZZAM BUTT ASC. MUHAMMAD ADEEL BUTT AHC

BASSAM AHMAD SIDDIQUI AHC

&

ASSOCIATES OF MUAZZAM LAW FIRM

to act and appear for me in the above Suit and on my behalf to conduct and prosecute (or defend) the same and all proceedings that may be taken in respect of any petition connected with the same or any decree or order passed therein and Applications for review to file and obtain return of documents, and to represent me/us and to take all necessary steps on my/our behalf in the above matter.

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



APPELLANT

ACCEPTED

  
MUHAMMAD MUAZZAM BUTT  
Advocate Supreme Court

  
MUHAMMAD ADEEL BUTT  
Advocate High Court

  
BASSAM AHMAD SIDDIQUI  
Advocate High Court