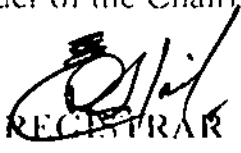


# FORM OF ORDER SHEET

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

**Appeal No.** 2034/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/10/2024	<p>The appeal of Mr. Anjad Khursheed 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>

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

*Appeal No. 2534/2024*

Amjad Khurshid.....Appellant

Versus

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

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1.	Appeal and verification	-	1 to 5
2.	Application for suspension	-	6
3.	Copies of first appointment letter and monthly salary account.	"A"	7, 8
4.	Copy of notification No. SO(Policy)EV AD/1-3/2020	"B"	9, 10
5.	Copy of impugned letter dated June 6 <sup>th</sup> , 2023	"C"	11 to 15
6.	Copy of minutes of meeting dated 06.07.2023	"D"	16 to 18
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8.	Copies of impugned letter dated 07.09.2023 and 25.09.2024	"F"	20 to 22
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**Dated: 21.10.2024**



(1)

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

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 16962

Dated 21-10-24

Service Appeal No. 2034/2024

Amjad Khursheed son of Khalil Ur Rehman, PSHT BPS-15  
at GPS Lohar Banda Circle Manshra, D.A.O  
16.09.1989.....Appellant

Versus

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

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

**P R A Y E R:**

**ON ACCEPTANCE OF INSTANT SERVICE APPEAL,  
THE IMPUGNED NOTIFICATION NO.  
SO(Policy)E&AD/1-3/2020 DATED 06.08.2020  
COMMUNICATED BY RESPONDENT NO. 2 VIDE  
LETTER DATED 06.06.2023 MAY BE DECLARED AND  
ORDERED TO BE STRUCK DOWN BEING VOID AND  
ULTRA VIRES TO THE CONSTITUTION OF  
PAKISTAN AND FUNDAMENTAL PRINCIPLES OF  
NATURAL JUSTICE AND AGAINST THE RIGHTS OF  
APPELLANT.**

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

Respectfully Sheweth!

- 1) That, the respondents Department appointed the  
appellant as Primary School Head Teacher.

(Copies of first appointment letter  
and monthly salary account are  
annexed as Annexure "A")

- 2) That, the Khyber Pakhtunkhwa (Appointment/Promotion/Transfer) Rules, 1989 as well as other sister services of the other provinces and Federation as well, availing of promotion by the employee is always optional and the employees as a matter of right may avail or forego their promotion and the next employee in seniority list is to be promoted.
- 3) That, some employees specifically have foregone their promotion as they could not serve in the areas where there is no facility of accommodation and no houses of their elders are available to look after them in far flung and solitary mountainous hard areas, and as per section 25 of per KP Civil Servant Act, 1973, rules to the extent of terms and conditions is framed by the Chief Minister and such promotion rules are not made applicable with retrospective effect. The rules framed are published in the gazette notification and part and parcel of KP civil Servant Appointment, Transfer, Promotion Rules, 1989.
- 4) That, Government of KP without following the rules position mentioned in Para 6 above promulgated notification SO(POLICY)E&AD/1-3/2020 dated 06.08.2020 communicated to respondent No. 2 vide letter dated 06.06.2023 wherein, it has been made mandatory to the employee to avail the promotion, otherwise. Disciplinary action shall be taken against the employees. The impugned notification is reproduced as under.
- "Furthermore, those officers/officials who do not comply with promotion order of the competent authority or try to evade promotion through different means shall be proceeded against under Khyber Pakhtunkhwa Civil Servants (Efficiency Discipline) Rules, 2011, please".**
- 5) That, as per notification No. SO(POLICY)E&AD/1-3/2020 dated 06.08.2020 the right of foregoing of promotion was withdrawn and the Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) deleted Rule 7(5) in the notification number SO(POLICY)E&AD/1-3/2020 dated 06.08.2020.
- (Copy of impugned notification No. SO(POLICY)E&AD/1-3/2020 dated 06.08.2020 is annexed as Annexure "B")
- 6) That, the Director of Elementary and Secondary Education KPK, Peshawar asked for guidance regarding deletion of Rule 7(5) in Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 in respect of which the respondent No. 1 vide its letter No. SO(POLICY)E&AD/1-3/2020 dated 06.06.2023 directed the respondent no 3 that rule 7(5) in the Khyber Pakhtunkhwa civil servants (Appointment,

Promotion and Transfer) Rules, 1989 has been deleted vide notification dated 06.08. 2020 and, therefore, no provision exists to decline or forgo promotion and it is obligatory upon every civil servant to accept promotion under every condition

(Copy of impugned letter dated June 06<sup>th</sup>, 2023 is annexed as Annexure "C")

- 7) That thereafter the meeting was also held in the office of Additional Secretary establishment on 06-07-2023 in which it was decided to examine the case properly and submit a self-contained/consolidated case for onward submission to the Establishment Department for further necessary action.

(Copy of minutes of meeting dated 06-07-2023 is attached as Annexure "D")

- 8) That the respondent No.3 i.e. Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa also wrote a letter to the office of Establishment & Administrative Department vide No. SO(PRIMARY-M)E&SED/2-2/Appointment Rules, 2023 dated 23.08.2023 to reconsider the amendment made in KPK Civil Servants, Appointment, Promotion and Transfer) Rules, 1989 as it had negatively affected a large number of teachers.

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

- 9) That, the respondents, vide its letter dated 07.09.2023 directed the Directorate of Elementary & Secondary Education KPK that necessary guidance has already been provided to the Department and therefore, no provision exists to decline or forgo promotion and those teachers who do not comply with the promotion order of the competent authority or try to evade promotion through different means shall be proceeded under the KPK Civil Servants (Efficiency & Discipline) Rules, 2011.

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

- 10) That, the petitioner feeling aggrieved, filed representation to respondents in person and also approached to respondents through APJA President but the grievances of the appellant have not so far been redressed.

(Copies of representation against the said notification, representation made by APJA President and Seniority List are annexed as Annexure "G, H & I")

- 11) That, feeling aggrieved from the letters dated 06.06.2023, 07.09.2023 and notification of DEO Mansehra Endst No. 8152-53 dated 25.09.2024 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 appellants 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.

**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 and 25.09.2024 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 letters dated 06.06.2023 and 25.09.2024 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.*

**Dated: 21.10.2024**

*[Handwritten Signature]*

Appellant

Through: -

**TAHIR SAJJID Advocate**  
Date: \_\_\_\_\_  
**Tahir Sajid Advocate**  
High Court - District  
Courts, Mansehra

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

*[Handwritten Signature]*

**ATTESTED**  
Malik Murtaza Maqsood  
Oath  
Commissioner  
Advocate Mansehra

16/10/24

(6)

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

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

Amjad Khursheed.....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  
LETTERS DATED 06.06.2023 AND 25.09.2024 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 letters dated 06.06.2023, 25.09.2024 is not suspended the appellant would suffer irreparable loss.
- 4) That, valuable right of the appellant is involved in this case.

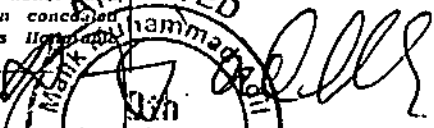

In view of the reason, it is humbly requested that the notification bearing No. SO(POLICY)E&AD/1-3/2020 dated 06.08.2020, communicated to respondent No. 2 by respondent No. 1, vide letters dated 06.06.2020 and 25.09.2024 may kindly be suspended till the final disposal of the main appeal in hand.

**Dated: 21.10.2024**

Through: -

**Affidavit**  
(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.

  
  
Tahir Sajid Advocate  
High Court, District  
Courts, Manshera

**TESTED**  
  
Commissioner  




(7)

ANN: "A"

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA.

O.O.No. 189

Dated. 16-9- /1989.

APPOINTMENT.

As recommended by Mr. Babar Nasim Khan Minister for Social Welfare & Population Welfare NWFP, and approved by Mohammed Afsar Khan Chairman D.D.A.C Mansehra the following candidates are hereby appointed as Primary Teacher in BPS-7 (Rs. 750/- PM fixed) plus usual allowances as admissible to them under the rules in the interest of public service with effect from the date of their taking over charge.

S.No.	Name, fathers name & address.	School where appointed.	Remarks.
1.	Mr. Anjad Khurshid S/O Khalilur Rehman R/O Deb No.2 Mansehra.	GPS Tranger.	Agst:V/PTC post.
2.	Mohammed Hanif S/O Mohd Sarwar R/O Rehman.	GPS Manna.	-do-
3.	Mr. Anjad Irfan S/O Miameetullah R/O Garhi Habibullah.	HPS Moori.	-do-
4.	Mr. Jahangir Ahmad S/O Abdul Jalil R/O Shamori (G.H.Ullah).	GPS Shangrien.	-do-
5.	Mohammad Nasim S/O Abdul Qayyum R/O Dogeh (G.H.Ullah).	GMS Badalgran.	-do-
6.	Mohd Abdul Kerim S/O Abdul Qayyum Khan R/O Jagir (B/Kote).	--do--	-do-
7.	Syed Imam Ali shah S/O S.Afsar Ali shah R/O Sari Khairabad.	Mosque School Parian (Lunda).	-do-
8.	Mohd Aftab Iqbal Khan S/O Mohd Iqbal Khan R/O Nenoh Kalam.	GMS Bhoonja.	-do-
9.	Mr. Zardad S/O Azizur Rehman R/O Garhi Habibullah.	Mosque School Kandar Garhi-Habibullah.	-do-

Note:-1. Charge report should be submitted to all concerned.

2. No. TA/DA etc is allowed to any one.

3. They should not be handed over charge if their age is below 18 years and above 25 years.

4. Their original certificate may be checked before handing over charge.

Contd: Page No. .... 2 .....



(7A)

Page No...2.....

5. They should produced their age and health certificates from Medical Supdt:DHQ Hospital Mansehra.
6. The appointment is purely temporary and liable to be termination at any time without any reasons.
7. Other terms and condition is laid down in the Service rule s.

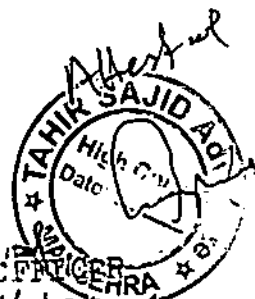
Sd/-----  
(KHURSHID AHMAD)  
DISTRICT EDUCATION OFFICER  
(MALE)MANSEHRA.

Endst:No. 11673-82 /EF-III Dated Mansehra the... 16-9= /89.

Copy of the above is forwarded for information and necessary action to the:-

1. Mr. Mohammed Afsar Khan Chairman D.D.A.C Mansehra.
2. Mr. Babar Hasim Khan Minister for Social Welfare & Population Welfare NWFP.
3. Sub Divisional Education Officer (M) Mansehra.
4. Headmaster GMS concerned.
5. Headteache4r Govt:Primary/Mosque School concerned.
6. Candidate concerned.
7. O.O. File.

DY: DISTRICT EDUCATION OFFICER  
(MALE)MANSEHRA. 16/9/89



(8)

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



**Personal Information of Mr AMJAD KHURSHID d/w/s of KHALIL U REHMAN**

Personnel Number: 00220665      CNIC: 1350306573635      NTN:  
 Date of Birth: 01.03.1966      Entry into Govt. Service: 17.09.1989      Length of Service: 35 Years 00 Months 015 Days

**Employment Category: Active Temporary**

Designation: PRIMARY SCHOOL HEAD TEACH      80003206-DISTRICT GOVERNMENT KHYBE

DDO Code: MA6145-Mansehra

Payroll Section: 001

GPF Section: 001

Cash Center: 3

GPF A/C No: EDUMA010220

GPF Interest applied

GPF Balance:

1,230,530.00 (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
1505	Charge Allowance	40.00	2148	15% Adhoc Relief All-2013	888.00
2199	Adhoc Relief Allow @10%	637.00	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

**Deductions - General**

Wage type		Amount	Wage type		Amount
3015	GPF Subscription	-4,290.00	3501	Benevolent Fund	-1,200.00
3609	Income Tax	-6,364.00	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: 101,809.05      Recovered till SEP-2024: 19,091.00      Exempted: 25451.23      Recoverable: 57,266.82

Gross Pay (Rs.): 139,894.00      Deductions: (Rs.): -12,589.00      Net Pay: (Rs.): 127,305.00

Payee Name: AMJAD KHURSHID

Account Number: 0117003001640665

Bank Details: THE BANK OF KHYBER, 080117 ABBOTTABAD ROAD MANSEHRA ABBOTTABAD ROAD MANSEHRA, MANSEHRA

Leaves:      Opening Balance:      Availed:      Earned:      Balance:

Permanent Address: MANSEHRA

City: MANSEHRA

Temp. Address:

City:

Domicile: NW - Khyber Pakhtunkhwa

Email: amjadkhurshid123@gmail.com

Housing Status: No Official



(9)

ANN: 'B'

BO

C

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(REGULATION WING)

NOTIFICATION

Dated Peshawar, the 06/8/2020

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-Ho. 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

LISTED & EVEN DATE

Copies 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 Deputy Director (IT), E&A Department.
- 13. All Section Officers in Establishment & Administration Department.
- 14. The Section Officer (Admn), Administration Department with the request to arrange 20 gazette copies.
- 15. The Controller, Administration Department.

*(Signature)*  
(WAJIAH LATIF)  
DEPUTY SECRETARY (POLICY)

*(Signature)*



(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.

(WAJDAH LATIF  
DEPUTY SECRETARY (POLICY)





Attached

19/04/2023 AS21/LM/VS GOVT CF PG43

(Signature) (Policy)

(Signature) (Policy)

Copy forwarded to him:  
1. To Deputy Secretary (Legal), Establishment Department.  
2. To Deputy Secretary (Policy), Establishment Department.

Ind. No. & Date

2011, please

Further, these 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.

The basic rationale behind the deletion of this bill rule is aimed at preventing a will serve first temptation for filling gap by sticking to a single lucrative position or to prevent those who tend to forge promotion to evade posting/transfer or show lack of respect to higher responsibilities in case of promotion. Therefore, it is obligatory upon every civil servant to accept promotion in every condition.

Further, these 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.

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The basic rationale behind the deletion of this bill rule is aimed at preventing a will serve first temptation for filling gap by sticking to a single lucrative position or to prevent those who tend to forge promotion to evade posting/transfer or show lack of respect to higher responsibilities in case of promotion. Therefore, it is obligatory upon every civil servant to accept promotion in every condition.

Subject: UPDATING LISTING OF OFFICERS IN THE CIVIL SERVICE (GENERAL) CATEGORY

The Government of Khyber Pakhtunkhwa, (Establishment, Efficiency & Discipline Division)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
No. SO/11147/2023  
(dated 16/04/2023)

67

(Signature)

ANN: C

(11)

Better copy page No.....

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT

No.SO(Policy)E&AD/1-3/2020  
Dated Peshawar the June 06.2023

BETTER COPY

To,

The government of Khyber pakhtunkhwa,  
Elementary & secondary education department.

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

Dear sir,

I am directed to refer to your letter No SO(PRIMARY.M)E&SED/22/Appointment/2023 dated 18.4.2023 on the subject noted above and to state that sub-rule (5) of rule-7 of Khyber pakhtunkhwa civil servants (appointment, promotion and transfer) rules, 1989 stands deleted vide this department notification dated 6.8.2020 thus no provision exists to decline or forgo promotion.

2. The basic Rational behind the deletion of the ibid rule is aimed at preventing a civil servant from temptation for illicit gain by sticking to a single lucrative post/position or to prevent those who tend to forgo promotion to evade posting/transfer or show lack of capacity to tackle higher responsibilities in case of promotion therefore it is obligatory upon every civil servant to accept promotion in every condition.

3. Furthermore, those officer/officials who do not comply with promotion order of the competent authority at try to evade promotion through different means shall be proceeded against under Khyber pakhtunkhwa civil servants (efficiency & discipline) rules, 2011, please.

Yours faithfully,

Issa Muhammad Khan  
Section Officer (Policy)

Ends: of even No & date



(13)



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, 1909.

I am directed to refer to the subject noted above and to enclose here with a letter of  
Establishment Department letter No. SO (Policy) E&AC/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 MAIL)

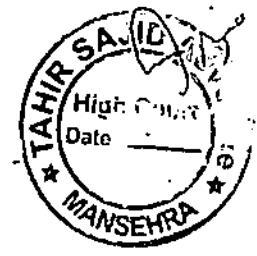
Copy forwarded to the:

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

SECTION OFFICER (PRIMARY MAIL)

WP/442-2023 AZIZULLAH VS GOVT OF PK43

*Attested*





(14)

ANNEXURE

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
CIVIL SECRETARIAT PESHAWAR  
(Phone No.091-9231507)

No. SO (Primary-M)/E&SE02-6/2023  
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(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 herewith 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 (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]*  
(MUHAMMAD GHASO)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

*[Handwritten Signature]*  
SECTION OFFICER (PRIMARY MALE)

WP442-2023 AZIZULLAH VS GOVT OF KP43



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 1999).

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/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) ERSE Department Civil Secretariat Khyber Pakhtunkhwa Peshawar

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

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

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

(Mr. Fazal Wahid)  
Deputy Director-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

(Abdulali)

Additional Secretary (Establishment)



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.

SR	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. Razaqat Ullah	General Secretary APTA Peshawar
4	Muhammad Ishaq	Section Officer (Primary) E&SE Department 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 related the issue regarding agenda item in detail.

3. After broadbased 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.

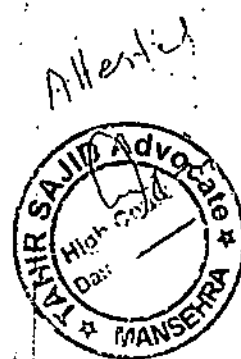
*(Mr. Fozal Wahid)*  
Deputy Director-1  
E&SE Department

*(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

*(Abuullah)*  
Additional Secretary (Establishment)  
E&SE Department





Handwritten signature or initials.

WP442-2023 AZIZULAH VS GOVT CP PG43

Assistant Director (Establishment)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

Assistant Director (Establishment)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

The case is submitted for perusal and necessary actions please.

Departmental Promotion Committee.  
provided they submit their written request for the conduct of the meeting of  
Teachers below 15-16 may be requested of implications of the amendment in the rules bid  
7(5) have affected adversely a large number of Female Teachers. Thus it is proposed that  
in view of the above, this office is of considered opinion that the deletion of Rules  
has been called for submission of consolidated case.  
Chairman/Secretary of the Government of Khyber Pakhtunkhwa at his office has  
That in the light of the minutes of meeting dated 6-07-2023 held under the  
(Primary) No. 50 dated 13-06-2023 dated 13-06-2023.  
The same was accepted by this office from your good office vide letter No. 50  
civil servant to accept promotion under every condition.  
that there shall be no provision in decline or forgo promotion. It is obligatory upon every  
When vide letter No. 50 (Primary) & A.O.I-17/20 dated 6-06-2023 collectively stated  
That the Government of Khyber Pakhtunkhwa Establishment Department (Regulation  
No. 50 (Primary) & A.O.I-17/2023 for necessary guidance.  
That your office forwarded the same to the quarter concerned vide letter  
provision.  
(ii) It is the prerogative of the civil servant to either accept or turn down the offer of  
No. 50 dated 06-07-2023.  
That this office should submit your good office in the following words vide letter  
vide notification No. 50-WI (A.O.I-17/20 dated 06-07-2023.  
dated Rules 7(5) in the Civil Servants (Appointment, Promotion & Transfer Rules 1989)  
The Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing)

present brief history about the background of the case as under  
C. Attachments of the meeting/PS72023 dated 10-07-2023 on the subject cited above and in  
I am directed to refer to the letter No. 50 (Primary) & A.O.I-17

Subject: -  
Dear Sir,

MINUTES OF THE MEETING

The Section Officer (Primary-Side),  
Elementary & Secondary Education Department,  
Khyber Pakhtunkhwa



No. 8145

Phone: 011-2323344

Email: estab@kpk.gov.pk

Khyber Pakhtunkhwa, Peshawar  
Date: 21-7-2023

(17)



Attentive

Assistant Director  
Elementary & Secondary  
Education, Khyber Pakhtunkhwa

- 1. PA to director local Directorate
- 2. Master copy

Copy of the above to:

please.

The case is submitted for and necessary actions

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.

- That 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.
- That the government of KP-ED (Regulation wing) vide letter no:SO(Policy) E&AD/1-31/2020 dated 6-06-2023 categorically stated that those exists no provision to decline/forgo promotion. It is obligation upon every civil servant to accept promotion under every condition.
- That in light of the minutes of meeting dated 6-07-2023 held under the chairmanship of Hon. Additional Secretary Establishment at his office. This office has been asked for submission of consolidated case.
- That Government of KP Establishment department (Regulation wing) dated rule 7(S) in civil servants (appointment, promotion and transfer Rule 199) vide notification no: SOR-VI (E&AD)-1-3/2020 dated 06-08-2020 That this office sought guidance from your good office in the following words vide letter no 6987 dated 06-02-2023 (i) Now it is obligatory upon civil servant to accept promotion. (ii) It is of civil servant to either accept/turndown the offer of promotion.

I am directed to refer to letter no (SO Primary-M) E&AD/5-1/G.Misc/Minutes of meeting/PS/2023 dated 10-7-2023 on subject cited above and to present brief history about background of case as under:

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

Subject: Minutes of Meeting

Dear Sir,

Directorate of Elementary & Secondary Education, KPK

Peshawar  
(21-7-2023)

BETTER COPY

(19)

ANN: "E"  
ANNEXURE  
E



ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
CIVIL SECRETARIAT, PESHAWAR  
(Phone No.091-9221587)

No. SO/Primary-M/E&SED/2-2/Appointment-Rule /2023  
Peshawar Dated 23<sup>rd</sup> August, 2023

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

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

Dear Sir,

I am directed to refer to your letter No. SO(Policy)/ EBAD/ 1-3/2020 dated 07 June 2023 and to state that after deletion of rule 7(5) Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion & Transfer Rules 1989) it has been intimated that those officers/ officials who do not comply with promotion order of the competent authority or try to evade promotion through different means shall be proceed under Khyber Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules, 2011.

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

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

SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

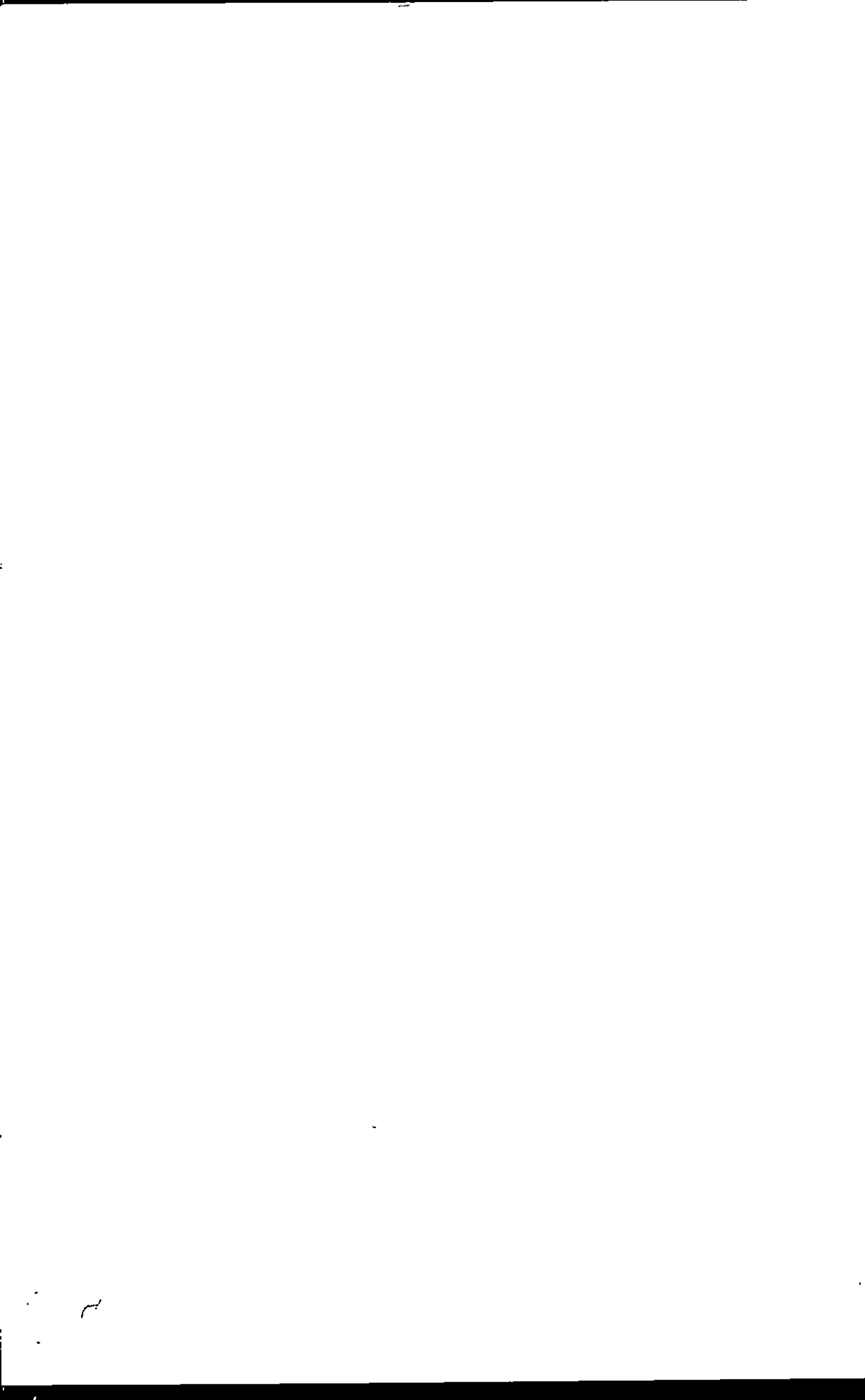
- 1. Director EBSE Khyber Pakhtunkhwa.
- 2. PS to Secretary, EBSE Department Khyber Pakhtunkhwa.

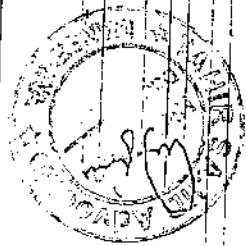
SECTION OFFICER (PRIMARY MALE)  
28/8/23

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WP4442-2023 AZIZULLAH VS GOVT OF PG43

Attest:  
  
SAJID Advocate  
High Court  
PESHAWAR





Attestation

WP1442-2023 AZİZULLAH VS GOVT OF PUNJ

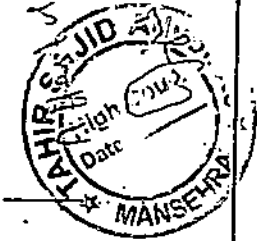
Section Officer (Policy)

Administrative form with multiple horizontal lines for text entry, including fields for name, address, and other details.



10

F



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

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

Subject: - GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE  
KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT,  
PROMOTION AND TRANSFER) RULES, 1932.

Dear Sir,  
I am directed to refer to your letter No. SO(Primary-M)/E&SED/2-  
2/Appointment-Rule/2023 dated 23.06.2023 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)

Enclst. 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.

www.gov.pk

(21)

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
No. 50(Policy)E&AD/1-3/2020  
Datd 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. 50(Primary-AI)/ERSED/2-2/Appointment-  
Rule/2023 dated 23.08.2023 on the subject noted above and to state that necessary  
guidance has already been tendered to your good office vide this department letter of even  
No. dated 06.06.2023 (copy enclosed).

Yours faithfully,

Section Officer (Policy)

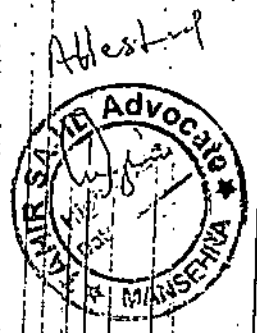
Encl: Of even No & date

Copy forwarded to the:-

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

Section Officer (Policy)

VP 1442-2023 AZIZULLAH VS GOVT OF POK



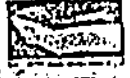
22

Annex

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA



Phone: 091-11221 Fax: 0997-34224  
E-mail: Address: Office, District Office, Manshera  
Post Box: Peshawar, 24100, Pakistan



No. 2151

Dated 25/09/2024

To  
The All Sub Divisional Education Officer,  
(Male) District Manshera.

Subject: SUBMISSION OF COMPLETE FILES IN RESPECT OF PSHT FOR PROMOTION AGAINST CT/DM/PET OPS-15.

Memo

I am directed to refer to the subject cited above and inform you that in the light of objection raised by DPC committee for the promotion of PSHTs to CT/DM & PET held on 26-03-2024 in the office of DIO (M) Manshera vide Hds: No: 2608 dated 25/03-2024 that all PSHTs having BA with CT/DM/PET are bound to submit their promotion files.

Allidavit regarding forgo is not acceptable, therefore all PSHT with BA/CT, DM & PET from N.S.L. No. 01 to 495, submit your complete files through ASDEO/SDEO concerned up to 30-Sep-2024, positively otherwise strict disciplinary action will be taken against you under E&D Rule 2011.

As per letter of Government of Khyber Pakhtunkhwa Establishment Department No. SO(Policy)E&AD/1-3/2020 Dated Peshawar the June 06, 2023:

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

*[Signature]*  
DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA

Order No. 8152-53 Dated 25/9/2024

- Copy for information to the:
  - The Director, E&SE KPK Peshawar.
  - The Deputy Commissioner Manshera
  - Office Copy

*A.H. SAJJID Advocate*  
*[Signature]*  
7579/2024  
MANSEHRA

BY: DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA

# بخدمت جناب سیکرٹری تعلیم خیبر پختونخواہ

اپیل!

عرض ہے کہ گورنمنٹ آف خیبر پختونخواہ کی جانب سے جو لازمی پروموشن کا حکم نامہ جاری ہوا وہ ایک متنازعہ 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 58 سال ہے۔ اگر وہ سی ٹی پوسٹ لینا چاہے تو سکیل 15 میں ہی آئیں گے اور سینارٹی متاثر ہو کر بائٹم میں اچھے جائیں گے جس کا نقصان یہ ہے کہ وہ SST پوسٹ سے محروم رہ جائیں گے۔
- ۲۔ یہ کہ جبرا CT پوسٹ لینا ہمیں منظور نہیں ہے کیونکہ ایک سال کے اندر اندر زیادہ تر PSHT، SST پوسٹ پر پروموٹ ہونے والے ہیں۔
- ۳۔ سابقہ حکومت نے پہلے سے PSHT/SPST اور PST کو اپ گریڈ کیا ہے جو کہ 01-07-2023 سے نافذ العمل ہے لیکن مالی کمی کی وجہ سے تاحال تاخیر کا شکار ہیں۔
- ۴۔ یہ کہ سکیل 15 سے سکیل 15 میں جانا کہاں کا پروموشن ہے یہ تو صرف کیڈز تبدیل ہو جانا ہے اور ہمارا مطالبہ پروموشن اپ گریڈیشن ہے جس میں واضح تبدیلی آجائے گی۔

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

11.7.2024

امجد خورشید PSHT

GPS لوہار بانڈہ سرکل ہانسرہ

*(Signature)*



۱۔ جناب سیکرٹری تعلیمات KPK

۲۔ جناب ڈائریکٹر تعلیمات KPK

~~APR 11 2013~~

WP4442-2013 AZIZULHAQ VS GOVT OF PERAK



Attorney

8/11/13  
~~APR 11 2013~~  
TAMIR SAGIN MANSEHA

Handwritten text in Malay script, appearing to be a legal notice or court order. The text is dense and covers several lines of the page.

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Annexure - 1

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APTA, Petaling Jaya, Selangor, Malaysia  
GUTHRIE PARK, Petaling Jaya, Selangor, Malaysia



Majlis Peguam Malaysia

APTA, Petaling Jaya, Selangor, Malaysia  
GUTHRIE PARK, Petaling Jaya, Selangor, Malaysia

H

-24-

ANN: "H"

(24)

N.SL No	O.SL No	Name of Present School	Name	Father's Name	BPS	Acad
264	1426	GPS MOHAR	MUHAMMAD SARDAR	ALI AKBAR	15	MA
265	1427	GPS ZAMEERI	NIJAZ AHMED	SARWAR KHAN	15	BA
266	1428	GPS SHAMORI	MUHAMMAD ASHRAF	ABDUR REHMAN	15	MA
267	1431	GPS GARLAT	MUHAMMAD SHOUKAT	MIR ABDULLAH	15	BA
268	1432	GPS NOORI	ZAKAR HUSSAIN	RAJA KHAWAS KHAN	15	BA
269	1433	GPS DONGI SERI	MUHAMMAD ASLAM	MUHAMMAD AYUB	15	FA
270	1438	GPS MAKHAN GALI	AURANGZEB	HABIB UR REHMAN	15	BA
271	1445	GPS TREHADDA	MUHAMMAD RIAZ	FAREED GUL	15	MA
272	1447	GPS BANDI GHULAM HAIDER KHAN	JAN MUHAMMAD	GHULAM HAIDAR	15	FA
273	1450	GPS KHAIL	UMAR ZAMAN	ALI ZAMAN	15	BA
274	1465	GPS BAFFA DORAHA	AKHTIR NAWAZ KHAN	MUHAMMAD NAWAZ KHAN	15	BA
275	1467	GPS JABBI NO.1	MUHAMMAD ASIF	GHULAM JILLANI	15	FA
276	1468	GPS NAWAN SHER	MUHAMMAD HAMAYUN	KHALIL UR REHMAN	15	BA
277	1469	GPS UPPER KHOLA	MUHAMMAD BANARAS	MIR ZAMAN	15	FA
278	1473	GPS MAJOR ZARIN SHAHEED	ZAHID KHAN	MUNAWAR KHAN	15	BA
279	1476	GPS CHEARH	MUHAMMAD TARIQ	GUL ZAMAN	15	BA
280	1478	GPS MAIRA AMJAD ALI	AMJAD ALI	MUHAMMAD SIDDIQUE	15	FA
281	1479	GPS MALKANI	MUHAMMAD SALEEM	MUHAMMAD MISKEEN	15	FA
282	1480	GPS DHARMANG	UMER FAROOQ	AHMAD NAWAZ	15	MA
283	1481	GPS CHAN GALI	DILAWAR KHAN	LAL KHAN	15	MA
284	1484	GPS SOACH	SAL KHEEN	MUHAMMAD ZAMAN	15	FA
285	1487	GPS DANA MOHIYAN	ALAM ZEB	RAJA AURANG ZEB	15	MA
286	1489	GPS GHAFOOR JABRI	MUHAMMAD HANIF	MUHAMMAD YOUSIF	15	BA
287	1491	GPS MURAD ABAD	SAEED UR REHMA	FAZAL UR REHMAN	15	FA
288	1492	GPS HAFEEZ BANDI	GHAZI KHAN	MUNWAR KHAN	15	BA
289	1505	GPS BADHAN	NISAR AHMAD	KHUSHAL KHANI	15	FA
290	1506	GPS OCHRI	RESHAM KHAN	AZIZ UR REHMAN	15	FA
291	1507	GPS LOHAR BANDA NO.2	AMJAD KHURSHID	KHALIL UR REHMAN	15	MA
292	1513	GPS RAJWAL	ABDUL QAYYUM	BADSHAH KHAN	15	FA
293	1516	GPS NIKKI MOHRI	MUHAMMAD HUSSAIN	KALA	15	FA
294	1521	GPS GARA DOLA	ABDUL SHAKOOR	MOLVI FAZAL HAQ	15	BA
295	1524	GPS KHAKI	MUHAMMAD RAFIQUE	MUHAMMAD AYAM KHAN	15	FA
296	1525	GPS BAJNA MERA	ASHFAQ AHMED	AFTAB AHMED	15	BA
297	1532	GPS BADAL GRAN	MANSHA KHAN	BIN YAMEEN KHAN	15	BA
298	1533	GPS HUNDI ARBAN	KHURSHID ANWAR	GHULAM DIN	15	BA
299	1536	GPS JABRI KALISH	MUHAMMAD MISKEEN	SAIN MUHAMMAD	15	BA
300	1538	GPS KHOLA	INYAT UR REHMAN	SARDAR ABDUR REHMAN	15	FA
301	1542	GPS BANDI SHUNGLI	NISAR KHAN	ALI BAHADAR	15	FA
302	1543	GPS SHUNGA	GHULAM HUSSAIN	MIRZA MIAN	15	BA
303	1545	GPS NALLA DADAR	IMTIAZ AHMAD	JIA KHAN	15	FA
304	1551	GPS NOR SUM	MUHAMMAD SADIQUE	RAHIM ULLAH	15	FA
305	1552	GPS KALWAL	SARDAR BHADAR	FAQIR MUHSAMMAD	15	BA
306	1554	GPS MIANA GALI	JAN MUHAMMAD	MUHAMMAD ZAMAN	15	FA
307	1555	GPS THAKAR MAIRA	MUHAMMAD SALEEM	ALI AKBAR	15	BA
308	1565	GPS HOTAR BALA	KHAN BAHADAR	MISAL KHAN	15	FA



DBAM No. 338

BC No. 10-2457

Name of Advocate طاہر ساجد

5743

S.No \_\_\_\_\_

Fee Rs. 200/-



# وکالت نامہ

بعدالت: جناب سروس ٹریبیونل پستاور

عنوان: انجید خورشید بنام: سیکرٹری گورنمنٹ - KPA

منجانب: ایسٹاڈنٹ نوعیت مقدمہ: سروس ایسبل

## باعث تحریر آنکہ

دریں مقدمہ عنوان بالا میں اپنی طرف سے برائے بیروی و جواب دی بہ مقام ..... ایسٹ آف با رہا کے لئے  
طاہر ساجد ایڈووکیٹ کو رٹ  
 کو بدیں شرائط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بوقت پکارے  
 جانے وکیل موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر منظر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ  
 میرے خلاف ہو گیا تو وکیل موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل موصوف صدر مقام کچہری کے علاوہ  
 کسی اور جگہ کچہری کے مقررہ اوقات سے پہلے یا بروز تعطیل بیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ کچہری کے علاوہ  
 کسی اور جگہ سماعت ہوا یا کچہری کے اوقات کے آگے پیچھے سماعت ہونے پر منظر کو کوئی نقصان پہنچے تو وکیل موصوف ذمہ دار  
 نہ ہوں گے اور وکیل موصوف کو عرضی دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل و گرانے کی 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 رقم کاروبار وصول  
 کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور پرمٹا شای و راضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار بھی ہوگا  
 بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری کی طرف درخواست حکم اتناعی یا فیصلہ قبل از ڈگری اجراء بھی وکیل موصوف  
 کر بشرط ادائیگی علیحدہ محتاتانہ ادا کرنے کا مجاز ہوگا اور بصورت ضرورت بد وراں مقدمہ یا اپیل و گرانے کسی دوسرے وکیل یا بیرٹر کو  
 بجائے خود یا اپنے ہمراہ مقرر کریں اور مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے وکیل موصوف کو  
 اور اگر پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو وکیل موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیروی نہ کریں اور ایسی حالت  
 میں میرا مطالبہ وکیل موصوف کے برخلاف نہیں ہوگا مجھے کل ساختہ پرداخت وکیل موصوف مثل ذات خود منظور و قبول ہوگا۔  
 لہذا وکالت نامہ لکھ دیا ہے اور دستخط/انگوٹھا ثبت کر دیا ہے تاکہ سند رہے۔ مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے۔

انجید خورشید وکیل ضلعی اشخان ساکنہ لوہار بانہہ مانسہرہ  
 D-Jadallah

مورخہ 21 اکتوبر 2024ء

