


FORM OF ORDER SHEET

Court of _____

Appeal No. 2024/2024


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17/10/2024	<p>The appeal of Mr. Muhammad Zeb resubmitted today by Mr. Ahmad Hussain Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on 06.11.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Muhammad Zeb received today i.e on 03.10.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Address of appellant is incomplete be completed according to rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Appeal has not been signed by the counsel.
- 3- Annexures of the appeal are unattested.
- 4- Minutes of the meeting dated 11.5.2024 mentioned in para-4 of the memo of appeal (Annexure-C) is not attached with the appeal be placed on it.
- 5- Annexure-E of the appeal is illegible be replaced by legible/better one.
- 6- Chamber address and contact number of the counsel engaged is not mentioned on the index of the appeal.
- 7- In the memo of appeal the words petitioner is used there is no provision in the Khyber Pakhtunkhwa Service Tribunal Act/rules 1974 for using the word petitioner.
- 8- Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.


No. 866 /Inst./2024/KPST,

Dt. 3/10 /2024.


ADDITIONAL REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Ahmad Hussain Adv.
High Court at Swat.

R. Sir, objection removed, while regarding objection No 4 the Appellant has filed an application for minutes of the meeting which the Department denied, Application is attached on page 17, hence put up before the Court as the same.


Ahmad Hussain
AHP
Dateel: 17.10.24



PAKISTAN - National Identity Card

ISLAMIC REPUBLIC OF PAKISTAN



Name

Mohammad Zeb



Father Name

Bakht Jehan

محمد زيب

بخت جهان

Gender

M

Country of Stay

Pakistan

Identity Number

15607-0358076-1

Date of Birth

10.12.1994

Date of Issue

06.10.2020

Date of Expiry

06.10.2030



M Zeb

Holder's Signature

سرحدی ریجن، ایف پی، منگلور، تحصیل باہرزی، ضلع سوات

17507-035807



101031351334

سوشل میڈیا ایف پی، منگلور، تحصیل باہرزی، ضلع سوات



Registrar General of Pakistan

گمشدہ کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں

33333

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUN KHWA,
PESHAWAR.**

Service Appeal No 2024.... of 2024.

Muhammad Zeb S/o Bakht Jehan PST 12 at GPS No 2 Manglawar Tehsil Babozai
District Swat.Appellant

Versus

Government of KPK through Director E&S Education KPK and others
.....Respondents

INDEX

S. #	Description of Documents	Annexure	Pages
1.	Service Appeal	---	1-3
2.	Affidavit	---	04
3.	Memo of addresses	---	05
5.	copy of appointment order is annexed as annexure	"A"	06
6.	Copy DPC dated 11-05-2024 is annexed as annexure	"B"	07
7.	Cop of impugned notification	"C"	08
9.	Copy of department appeal	D	09-11
10	Copy of notification is annexed as annexure	E	12
11	All other Relevant documents		13-17
.12	Wakalat Nama	---	18

Appellant
Through Counsel

Ahmad Hussain Advocate High Court
Off: D, 3,4 3rd Floor, Continental Plaza,
Makanbagh ,Mingora, District Swat.
CellNo:03339463679

①

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUN KHWA,
PESHAWAR.**

Service Appeal No .2024... of 2024

Muhammad Zeb S/o Bakht Jehan PST BPS 12 at GPS No 2 Manglawar Tehsil
Babozai District Swat.Appellant

Versus

- 1) Secretary Education Khyber Pakhtun Khwa at Peshawar .
- 2) Director E&S Education Khyber Pakhtun Khwa " Chairman Departmental
Promotion Committee, at Peshawar.
- 3) District Education Officer "Male District Swat.Respondents

**Appeal under Section 4 of Service Tribunal Act read with any other
relevant provisions, against no action taken on the departmental
appeal no 416 Dated;06-06-2024 within the statutory period of 90
days.**

PRAYER:

**On acceptance of this appeal the respondent No 2 may kindly be
directed to promote the appellant from PST BPS 12 to PET BPS -
15 along with all the benefits from the date 23-05-2024.**

Respectfully Sheweth:

The appellant submits as under;

- 1) That the appellant was appointed for the post of BPS-12 (PST) in
Government Primary school Islampur in 2017. (copy of appointment order
is annexed as annexure A)
- 2) That the appellant is serving as PST BPS -12 since 08-04-2017 at GPS No 2
Manglawar Tehsil Babozai District Swat.
- 3) That the appellant being suitable and eligible was very impatiently
waiting for promotion to the post of PET BPS-15 for long.
- 4) That appellant along with few others who had been eligible for promotion
to PET were included in the Departmental promotion committee (DPC)
Dated: 11-05-2024.
(Copy DPC dated 11-05-2024 is annexed as annexure B)

- 2
- 5) That the appellant was waiting for the promotion to the post of PET since he was included in the DPC and being eligible but all of sudden the Department were illegally, unlawfully issued the impugned notification Endst: No. 11408-12/promotion/PET/2024, dated 23/05/2024.
(Copy of Notification is annexed as Annexure C).
 - 6) That despite having the required qualification and experience and being eligible for promotion, the appellant was discriminated by not considering him for promotion to the post of PET.
 - 7) That the appellant was competent, eligible and deserving to be promoted to PET, otherwise not promoting is not only illegally, unlawfully but beyond reason and understanding.
 - 8) That being morally and legally aggrieved the petitioner has no other remedy but to prefer the departmental appeal No. 416, dated 06/06/2024 before the respondent No. 2 and requested him for his promotion to the said post.
(Copy of departmental appeal is annexed as Annexure D).
 - 9) That the departmental appeal is still pending and the respondent No. 2 has badly failed to take any action on it within the statutory period of 90 days.
 - 10) That being morally and legally aggrieved from the action and inaction of the respondents No. 2, the appellant has no other remedy but to prefer the instant appeal under section 4 of Service Tribunal Act read with any other relevant provisions, before this Hon'ble Court, inter alia on the following grounds.

GROUND:

- i. That the appellant was serving as PST BPS 12, since 2017. He had completed his five years required service and was eligible / fit for promotion to the post of PET.
- ii. That the appellant also had the required academic qualification.
- iii. That the appellant has passed JDPE from Sarhad University in the year of 2018.
- iv. That the appellant is having good academic carrier and relevant qualification as that of the appellant have already been promoted to the post of PET, BPS-15 vide notification Endst: 2210-14, dated 20/04/2019. **(Copy of notification is annexed as annexure E).**
- v. That the impugned action of respondent is against the law, facts, material available on record. Hence liable to be rectified.

(3)


- vii) **That** the article 4 of the constitution of Islamic Republic of Pakistan 1973, has clearly unequivocally stated that every individual is to be dealt in accordance with law, but in the instant case not only this principle but article 25 of the Constitution of Islamic Republic of Pakistan which guarantees equality has also been violated.
- viii) **That** the appellant is well qualified and fulfills the required qualification as well as criteria for promotion to the post of PET.
- ix) **That** the appellant has not been treated in accordance with law and rules on the subject noted above.
- x) **That** other grounds not specifically raised will be argued with the prior permission of this Honorable Court at the time of arguments.

Prayers;

It is therefore very humbly prayed that On acceptance of this appeal the respondent No 2 may kindly be directed to promote the appellant from PST BPS 12 to PET BPS -15 along with all the benefits from the date 23-05-2024

Any other relief not specifically prayed for but this august court deem proper may also be granted.

**Appellant
Muhammad Zeb**


**Ahmad Hussain
Advocate High Court**



PAKISTAN National Identity Card

ISLAMIC REPUBLIC OF PAKISTAN



Name

Mohammad Zeb



Father Name

Bakht Jehan

محمد زيب

بخت جهان



Gender Country of Stay
M Pakistan

Identity Number
15607-0358076-1

Date of Birth
10.12.1994

Date of Issue
06.10.2020

Date of Expiry
06.10.2030

M Zeb

Holder's Signature

پست سروس
پست سروس
پست سروس

15607-0358076-1



پست سروس
پست سروس
پست سروس

101031351334

گمشدہ کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں

(4)

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUN KHWA,
PESHAWAR.**

Service Appeal No of 2024.

Muhammad Zeb S/o Bakht Jehan R/o Bhatani Bypass Manglawar Tehsil Babozai
district SwatPetitioner

Versus

Government of KPK through Director E&S Education KPK and others

.....Respondents

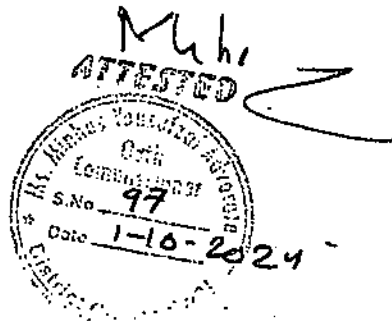
AFFIDAVIT

I, Muhammad Zeb S/o Bakht Jehan R/o Bhatani Bypass Manglawar Tehsil Babozai district Swat, do hereby solemnly affirm and declare on oath that all the contents of this Service Appeal are true and correct to the best of my knowledge and belief, and nothing has been concealed from this Honorable Court.

DEPONENT

(M) *Muhammad Zeb*

Muhammad Zeb
In person



5

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUN KHWA,
PESHAWAR.**

Service Appeal No of 2024.

Muhammad Zeb S/o Bakht Jehan R/o Bhatari Bypass Manglawar Tehsil Babozai
district SwatPetitioner

Versus

Government of KPK through Director E&S Education KPK and others
.....Respondents

ADDRESSES OF THE PARTIES

ADDRESS OF THE PETITIONER

Muhammad Zeb S/o Bakht Jehan R/o Bhatari Bypass Manglawar Tehsil Babozai
district Swat

CNIC: 15607-0358076-1

Cell: 03443730281

ADDRESSES OF THE RESPONDENTS

1. Secretary Education Khyber Pakhtun Khwa at Peshawar
2. Director E&S Education Khyber Pakhtun Khwa at Peshawar.
3. District Education Officer "Male" Chairman Departmental Promotion
Committee District Swat.

PETITIONER

M Zeb

Muhammad Zeb



(6) "A"

**OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
Swat (Phone No: 0946 9240209-228)**

APPOINTMENT

Consequent upon the recommendation of the Departmental Selection Committee, the following candidates are hereby appointed against the vacant posts of PST in BPS-12 Rs.11140/-PM Fixed plus usual allowances as admissible under the rules and existing policy of the Provincial Government on the terms & conditions given below for a period of one year purely on ad hoc school based in the interest of the public service.

U/C ISLAMPUR

S. #	Name of candidate	Father's Name	D/O Birth	Score	School where posted
1	Ahmad Zeb	Ahmad Jan	25/09/1993	136.71	GPS Chitor
2	Bahadar Sultan	Nasrullah	14/11/1995	112.44	GPS Islampur
3	Hazar Gul	Rahman Gul	08/04/1983	110.15	GPS Sher Atrai
4	Ijaz Hussain	Fazal Khaliq	13/05/1992	109.87	GPS Chitor
5	Muhammad Afaq	Masoom Khan	12/07/1994	108.34	GPS Chitor
6	Nasir Ali	Mian Gul Hiraaj	10/04/1981	106.04	GPS Islampur
7	Rahim Iqbal	Muhammad Iqbal	03/04/1994	105.17	GPS Gulbandal
8	Abdullah	Bakht Akbar	01/01/1980	103.82	GPS Islampur
9	Mohammad Zeb	Bakht Jehan	10/12/1994	103.39	GPS Islampur
10	Haider Khan	Hadi Khan	25/02/1984	100.17	GPS Islampur
11	Fazal Salam	Aqal Nabi	17/12/1996	99.77	GPS Sher Atrai

Terms & Conditions

1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned.
3. Appointment is purely on temporary ad hoc and school based for a period of one year with effect from 08.04.2017 to 07.04.2018 which is extendable as per the policy of the provincial Govt.
4. Appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities; anyone found producing bogus certificate/s or degree/s his appointment shall be cancelled and he will be reported to the Law enforcing agencies for further legal action.
5. Pay shall not be drawn until and unless a certificate issued by this office, that their documents are verified by the institutes/Boards/Universities concerned.
6. They should join their posts within 15 days of the issue of this notification. In case of failure to join the post within 15 days of the issue of this Notification their appointment shall stand expired automatically and no subsequent appeal etc. shall be entertained.
7. Health & Age Certificate should be produced from the Medical Superintendent before taking over charge.
8. They will be governed by such Rules and Regulations as may be issued from time to time by the Government.

11

17

Handwritten notes and scribbles, including a large, faint number '17' in the upper left and various illegible markings throughout the page.

Handwritten text, possibly a signature or date, located in the lower right quadrant.



(MALE) AT GULKADA DISTRICT SWAT

Phone/Fax No. 09469240228



OFFICE ORDER:

Consequent upon the recommendation of Departmental Promotion Committee, and in pursuance to the notification of Govt. of Khyber Pakhtunkhwa E&SE Department Notification No.50(PE)4-5/SSRC/Meeting/2012/Teaching cadre, Dated 13/11/2012, the following Senior Primary School Teachers BPS-14 are hereby promoted to the post of Physical Education Teachers (PET) BPS-15 @ Rs. (23920-1980-83320) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Govt. on the terms and conditions given below with immediate effect.

S/N	SLNO	Name of Teacher	Present School	Circle	School where posted
1	1286	Saeed Ur Rahman	GPS Lilbanr	Matta	GHSS Onra Dherai
2	1308	Abdul Kabeer	GPS Ushoo	Bahrain	GHS Matiltan

TERMS AND CONDITIONS:

1. They would be on probation for a period of one year extendable to another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt. of Khyber Pakhtunkhwa.
3. Their services can be terminated at any time, if their performance is found unsatisfactory during the probation period.
4. In case of misconduct, they shall be proceeded under the rules framed from time to time by the Govt. of Khyber Pakhtunkhwa.
5. Charge reports should be submitted to all concerned.
6. No TA/DA is allowed for joining the duties.
7. In case of any disciplinary or miss-reporting found in the academic/ professional documents in respect of the above officials, their promotion shall stand cancelled.
8. Pay shall not be drawn until & unless the verification of necessary documents.

(MUHAMMAD RIAZ)
DISTRICT EDUCATION OFFICER (M)
DISTRICT SWAT

Encls: No:11408-12/Promotion/PET/2024

Dated:23/05/2024

Copy to:

- 1) Director E&SE Khyber Pakhtunkhwa Peshawar.
- 2) District Comptroller of Accounts Swat.
- 3) The District Monitoring Officer (EMA) Swat.
- 4) The Principal/Head Masters concerned.
- 5) Sub-Divisional Education Officers (M) Matta &, Bahrain Swat.
- 6) PA to DEO (M) office.
- 7) AD-IT local Office.
- 8) The teachers concerned.

DISTRICT EDUCATION OFFICER (M)
DISTRICT SWAT

"0"

9

**BEFORE THE DIRECTOR E&S EDUCATION KHYBER
PAKHTUN KHWA AT PESHAWAR.**

Muhammad Zeb S/o Bakht Jehan R/o Bhattai Bypass Manglawar Tehsil
Babozai district SwatAppellant

DEPARTMENTAL APPEAL AGAINST OFFICE ORDER ENDST:NO
11408-12 / PROMOTION /PET/2024 DATED 23-05-2024.

Respectfully Sheweth:

The appellant submits as under;

- 416
6-6-2024
- 1) That the appellant was appointed for the post of BPS-12 (PST) in Government Primary school Islampur in 2017. (copy is attached)
 - 2) That the appellant is serving as PST-BPS -12 since 08-04-2017 at GPS No 2 Manglawar Tehsil Babozai District Swat.
 - 3) That the appellant being suitable and eligible was very impatiently waiting for promotion to the post of PET BPS-15 for long.
 - 4) That appellant along with few others who had been eligible for promotion to PET were included in the Departmental promotion committee (DPC) Dated: 11-05-2024. (Copy is attached)
 - 5) That the appellant was waiting for the promotion to the post of PET since he was included in the DPC and being eligible but all of sudden the Department were illegally, unlawfully issued the impugned notification Endst:No 11408-12 / promotion /PET /2024 dated 23-05-2024. (Copy is attached)
 - 6) That despite having the required qualification and experience and being eligible for promotion, the appellant was discriminated by not considering him for promotion to the post of PET.
 - 7) That the appellant was competent, eligible and deserving to be promoted to PET, otherwise not promoting is not only illegally, unlawfully but beyond reason and understanding.

10

8) That being morally and legally aggrieved the appellant has no other remedy but to prefer the instant departmental appeal inter alia the following grounds.

GROUNDS:

- i) That the appellant was serving as PST BPS 12 since 2017. He had completed his five year required service and was eligible/fit for promotion to the post of PET.
- ii) That the appellant also had the required academic qualification.
- iii) That the appellant has passed JDPE from Sarhad University in the year of 2018.
- iv) That the appellant is having good academic carrier and relevant qualification along with required diploma to be promoted.
- v) That other teacher who had same academic qualification as that of the applicant have already been promoted to the post of PET BPS15. vide notification Endst: 2210-14 dated 20-04-2019.
- vi) That the impugned action of respondent is against the law, facts, material available on record. Hence liable to be rectified.
- vii) That the article 4 of the constitution of Islamic Republic of Pakistan 1973, has clearly unequivocally stated that every individual is to be dealt in accordance with law; but in the instant case not only this principle but article 25 of the Constitution of Islamic Republic of Pakistan which guarantees equality has also been violated.
- viii) That the appellant is well qualified and fulfills the required qualification as well as criteria for promotion to the post of PET.

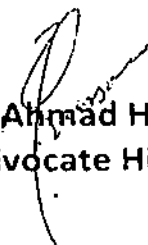
(11)
ix) That the appellant has not been treated in accordance with law and rules on the subject noted above.

Prayers;

It is therefore , very humbly prayed that On acceptance of this appeal the appellant may kindly be promoted from PST BPS 12 to PET BPS -15 along with all the benefits from the date 23-05-2024.


Appellant

Muhammad zeb


Ahmad Hussain
Advocate High court.

12

E

OFFICE OF THE DISTRICT EDUCATION OFFICER
(M) SWAT AT GULKADA
 Call No 0945 0210209-224

NOTIFICATION

In consequence upon the recommendation of the Departmental Promotions Committee in meeting held on 20/11/2019 and Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. S.W.A.T. (E.P.A.S.E) 2012 dated 11/07/2012 and Finance Department Government No. SWP/R/11/10/12811/2010 dated 16/07/2012. The following date 351 teachers are posted to the post of PCT B 1-11/120-1320-30020, and plus usual allowances as they are admissible under the rules on the following terms & conditions w.e.f. the date of their taking over charge:

S.No	Name	Present School	Name of School where in consequent adjusted	Remarks
1	Muhammad Aslam	GMS Paragat	GMS Koo Moolam Jada	

CONSEQUENT ADJUSTMENT

S.No	Name & Designation	Present School	Name of school where in consequent adjusted	Remarks
1	Muhammad Aslam	GMS Koo Moolam Jada	GMS Paragat	A.V. Post

Terms & Conditions

- 1. No TA, DA is admissible.
- 2. All documents should be submitted to all concerned.
- 3. The service be terminated at any time in case their performance is found unsatisfactory during probationary period.
- 4. In case of any conduct, he shall be proceeded under the rules framed from time to time.
- 5. He must serve minimum in lower post will be remain there.
- 6. He will give no holding note accepted in his service book in the defect that if any over payment made to him in the light of this order will be recovered, if they are wrongly promoted they will be reversed.
- 7. He should see his post within 15 days the issue of this order positively. Otherwise the appointment shall stand cancelled.
- 8. His documents that have to be checked by the concerned institution and in case he do not comply the concerned institution may be handed over charge of the post.
- 9. His necessary documents will be verified from the concerned institution.

MUHAMMAD ASLAM
 DISTRICT EDUCATION OFFICER
 SWAT AT GULKADA

dated: 22/10/19

22/10/19

Encl: No. / PCT / Promotion

- 1. Copy of the above is forwarded for information & necessary action to:
- 2. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 3. The District Controller of Accounts Swat.
- 4. The Principal/ Headmaster concerned.
- 5. The candidate concerned.
- 6. O.A. & C. Office.

DISTRICT EDUCATION OFFICER
 SWAT AT GULKADA

(Better Copy)

OFFICE OF THE DISTRICT EDUCATION OFFICER

(M) SWAT AT GULKADA

Cell 09469240209-228

Notification

Consequent upon the recommendation of the departmental promotion committee in its meeting held on 20/4/2019 and Govt of Khyber Pakhtun Khwa Elementary and Secondary Education Department Notification No SO(B&A)/1-1R/E&SE/2012 dated 11-07-2012 and Finance Department Endorsement No SO9FRYFDY1022N9R02010 dated 16-07-2012. The following Male PST are hereby promoted to the post of PET B 15 (16120-13305(ii)2(i) and plus annual allowances as due and admissible under the rules on the following term & condition wef the date of their taking over charge .

S.NO	S.No	Present school	School where promoted	Remarks
1	2202	GPS Fizagat	Gms Koo Malam Jaba	A V Post

CONSEQUENT ADJUSTMENT

S.no	Name & Designation	Present School	Name of school where is consequent adjusted	Remarks
1	Attaur Rahman PET	GMS Koo Malam Jaba	GMS Dangram	A.V.POST

Terms & Condition

1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned.
3. The service be terminated at any time in case their performance if found unsatisfactory during probatory period in case of mis conduct he shall be proceeded under the rules framed from time to time.
4. His inter service seniority in lower post will be remain intact.
5. He will give under taking to be accorded in his service book to the defect that if any over payment is made to them in the light of this order will be recovered in if they are wrongly promoted they will be reversed.
6. He should joint his post within 15 days the issue of this order positively. Otherwise the appointment shall stand cancelled.
7. His documents shall have to be checked by the concerned institution and in case they do not possess the required relevant qualification as per rules they may not be handed over charge of the post.
8. His necessary documents will be verified from the concerned institution.

(Muhammad Amin)

District Education OFFICER
SWAT AT GULKADA
DATED 20/04/2019

Endst.No 2210-14/pet/Promotion

dated 20/04/2019

Copy of the above is forwarded for information & necessary action to

1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. The district controller of accounts Swat.
3. The Principal /Headmaster Concerned.
4. The candidate concerned.
5. PA TO D E O local office.

DISTRICT EDUCATION OFFICER
(MALE) SWAT AT GULKADA

(13)

EMIS Code	Office/School	School Gender	District
35441	GHS MATILTAN	MALE	SWAT
33392	GHS LAKHAR	MALE	SWAT
35444	GHS MANAI	MALE	SWAT
33382	GHS GODA	MALE	SWAT
33391	GHS KOZ SHAWAR	MALE	SWAT
35451	GHS QALAGAY	MALE	SWAT
33393	GHS LALKOO	MALE	SWAT
39089	GHS AZAD BANDA	MALE	SWAT
33418	GHS TIRAT_DARA	MALE	SWAT
33413	GHS SIGRAM	MALE	SWAT
36566	GHSS KALAM	MALE	SWAT

[Handwritten Signature]

(14)

	EMIS Code	Office/School	School Gender	Dis
✍	42044	GHSS SHAKARDARA	MALE	
✍	42040	GHSS ONA DHERAI	MALE	
✍	41058	GMS PARDISHA	MALE	
✍	33387	GMS JALBANR	MALE	
✍	33408	GMS SAR BANDA	MALE	
✍	42025	GMS LAI SANDA	MALE	
✍	41770	GMS BAKOOR	MALE	
✍	33420	GMS KABAL KOO	MALE	
✍	33419	GMS TORWAL	MALE	
✍	42065	GMS RAGISTUN	MALE	
✍	33367	GMS CHARMA	MALE	

Quora

(15)

36876	GMS KALAGAY	MALE	SWAT
33362	GMS BAFAR	MALE	SWAT
33363	GMS BESHIGRAM	MALE	SWAT

[Handwritten signature]

Handwritten mark

By promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teachers	
recruitment of Primary School Teacher, having qualification prescribed for initial Teachers with at least ten years service and fitness, from amongst Senior Primary School	
By promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teachers	

Handwritten mark

Note: In case of non-availability of suitable candidate for promotion, then by initial recruitment.

Teacher.

initial recruitment of physical education teachers with at least five years service and having qualification prescribed for initial recruitment of physical education on the basis of seniority-cum-fitness from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of physical education.

provided that if no suitable candidate is available for promotion on the basis of seniority-cum-fitness from amongst the Primary School Teachers, twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Teachers and having qualification prescribed for initial recruitment of physical education.

Handwritten notes:

151035

151035

151035

(a) Eighty per cent by initial recruitment and

(b) twenty per cent by promotion, on the

کفر، بہا - DEO Male - ان

① درخواست بکر ادعی کا تسلی اجازت پر اٹھانے کے لئے
DPC برائے PET POST 2024 کو مقرر کیا گیا ہے

صفا عالی -

1- یہ کہ سائیلن - ^{Masrion} Master 1
PST ^{Gawad} دہلی ایس، کوڑی رس، (دستیار) ایس ایس ڈی ایس
اور محرز بن Manglor ² EPS PST ہے -

2- یہ کہ سائیلن نے DPC مذکورہ بالا میں
اور اس سے ^{Departmental} اپنی کوئی کارروائی لاگو نہیں کی ہے
بہر حال اس سے سائیلن نے سروس ٹریسنگ میں
اپنی دائرہ کی ہے جس سے DPC Minutes کی ضرورت
ہے لیذا مذکورہ Minutes ملے لگائے جانے
کی جائے -
لیذا استدعا ہے کہ آپ اپنی ضرورت پر
درخواست دہر کارروائی حاصل فرمائی جائے

5818
9/10/2024
شرف
مدد اعتماد اللہ خان
مہی الاہی
شریقت اللہ
محرز بن

BC 10 35 49

بار کونسل نمبر:

196

بار ایسوسی ایشن نمبر:

0333 9463679

رابطہ نمبر:

adzulfi34@gmail.com

ای میل ایڈریس:



151490

سرٹیفکٹ نمبر:



ڈسٹرکٹ بار ایسوسی ایشن سوات

بعدالت جناب: سر جسٹس سید محمد رفیق کھٹک خواجہ کسٹڈر

منجانب: اسٹیشن	دعویٰ اور خواست: سر جسٹس اسٹیشن
محمد زبیب	علت نمبر:
بنام	مورخہ:
حکومت	جرم:
	تھانہ:

باعت تحریر آنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام _____ کیلئے احمد حسین ایڈووکیٹس ہائی کورٹ کے

اقرار کیا جاتا ہے، کہ صاحب موصوف کو مقدمہ کی کل کارروائی کو کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث کرنے، دعویٰ، جواب دعویٰ، اقبال دعویٰ اور درخواست برائے سرسبزی مقدمہ، منسوخی ڈگری یکطرفہ، اجراء و پیروی کرنے کا مختار ہوگا۔ نیز دائر کرنے اپیل نگرانی، نظر ثانی و پیروی کرنے کا مختار ہوگا۔ اور مقدمہ مذکورہ کیلئے کل وقتی یا جزوی کارروائی کیلئے کسی دیگر وکیل یا مختار قانون کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی جملہ مذکورہ اختیارات حاصل ہوں گے، اور اس کا ساختہ و پرداخت منظور قبول ہوگا، بدوران مقدمہ جو خرچہ و ہرجانہ کسی بھی سبب سے حاصل ہوگا، وہ وکیل موصوف وصول کرنے کا حقدار ہوگا، کوئی تاریخ پیشی مقام مذکورہ بالا سے باہر ہو، تو وکیل صاحب پیروی مقدمہ کرنے کے پابند نہ ہوں گے، مقدمہ کسی عدالت میں بعدم پیروی خارج ہونے یا ڈگری یکطرفہ ہونے کے صورت میں وکیل صاحب ذمہ دار نہیں ہوں گے،

لہذا وکالت نامہ لکھ دیا کہ سندر ہے

مقام _____ سر جسٹس سید محمد رفیق کھٹک خواجہ کے لئے منظور ہے۔

ایڈووکیٹ دستخط:

المقام: 24-10-1

محمد زبیب اسٹیشن