


# FORM OF ORDER SHEET

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

Appeal No. 2080 /2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/10/2024	<p>The appeal presented today by Mr. Muhammad Muazzam Butt Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 30.10.2024. 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 = 2080/24*

Gul Mina

V/S

Government of KP & others

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*[Signature]*  
ADVOCATE

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA

In Ref to

Service Appeal No 2080 /2024

Gul Mina wife of Tajamul Hussain Resident of Tehsil & District Peshawar

Designation: Primary School Head Teacher at GGPS Sheikh Killi

.....Appellant

**V E R S U S**

- 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

.....Respondents

**SERVICE APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT 1974, AGAINST THE IMPUGNED NOTIFICATION BEARING NO.SO(POLICY)E&AD/1-312020, 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/1-312020, 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 Monthly Salary account 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 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 forgo promotion and it is obligatory upon every civil servant to accept promotion under every condition. Copy of Impugned Letter dated June 06th, 2023 is 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 grievances of the appellant have not so far been redressed. Copy of Representation against the said notification is annexed as **Annexure G & H**
11. That feeling aggrieved from the 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 effects 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 setaside.

- 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 /2020 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 1-2020 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.

*Gul Mina*  
Appellant

Through

*Muhammad Muazzam Butt*

Muhammad Muazzam Butt  
Advocate Supreme Court

*Muhammad Adeel Butt*

Muhammad Adeel Butt  
Advocate High Court

*Bassam Ahmad Siddiqui*

Bassam Ahmad Siddiqui  
Advocate High Court  
LL.M- Human Rights

**AFFIDAVIT:**

I Gul Mina wife of Tajamul Hussain Resident of Tehsil & District Peshawar that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court

*Gul Mina*  
Deponent

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA**

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

In Ref to

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

Gui Mina

**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.

**AFFIDAVIT**

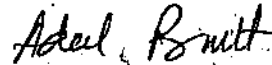
I [the appellant] do hereby solemnly stated on oath that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein this Honorable Court.

  
Deponent

  
Appellant

Through

  
Muhammad Muazzam Butt  
Advocate Supreme Court

  
Muhammad Adeel Butt  
Advocate High Court

STED

19,974.00

1,000.00

878.00  
4,290.00  
1,206.00  
145.00  
600.00

TAX: (3609)

9,520.00

97,037.00  
5,011.00  
5,011.00  
3,224.00  
397.00  
563.00  
1,500.00  
2,856.00  
8,743.00  
51,648.00

81 88556

Old #

GET # 200856

NAME

8 School North-October 2023  
EMERGENCY - GOVT. PRIMARY SCHOOL/TEAM  
GOVT. PRIMARY SCHOOL (TEAM)

4904-R. BENEFITS & DEATH COMP  
4950-EMP. FUND FUND  
5501-BENEFIT FUND  
GPP BALANCE 224,744.00

3,017.92

DEDUCTIONS:

GROUP PAY AND ALLOWANCES  
2967-ADVICE FOR 154 22(8827)  
2941-ADVICE FOR 154 20(8827)  
2916-TEACHING ALLOWANCE 2021  
2199-ADVICE RELIEF ALLOW 8103  
2746-154 ADVICE RELIEF 111-2013  
1000-MEDICAL ALLOWANCE  
1210-COURTY ALLOWANCE 2805  
1084-HOUSE RENT ALLOW 451 8821  
8081-BASIC PAY

OTHER DEDUCTIONS:

15 - Vocational Temporary  
EMP. DEDUCTIONS - Applied  
PRINCE SCHOOL (TEAM) FUND  
CREDIT NO. 173011080090

NAME: GUN MIRA

BOOKING: 00200856



جارج رپورٹ - 7

مکرمہ صاحبہ کی والدین حضرت مسیح النبی صلی اللہ علیہ وسلم کے

آرڈر نمبر 2858-327 آئندہ از ایگزیکٹو ڈسٹرکٹ ایسٹریٹنگ آفس

نشانہ نمبر 12/11/2004 آج مورخہ 20-11-2004 قبل از دوپہر

گورنمنٹ گرلز ہائی اسکول جس کے مینیجنگ ڈائریکٹر نے

اس کی جارج سنڈیل کی

رپورٹ پیش کی ہے۔

دستخط جارج رپورٹ

دستخط جارج رپورٹ

Frangin Tahira 86-20/11/04  
HEAD MISTRESS  
Govt Girls Primary  
School, Shalib Kati

Signature  
20/11/04

Asst. Insp. Officer (F)  
M&S, Edu. Matn  
Peshawar

ATTESTED

Encl: No. 2000-3217 Page No. 18 /2004

- 1 PS to Minister Education (W/P)
- 2 PS to Secretary Schools & Education Department of NWFC Peshawar
- 3 PA to Director Schools & Literacy Peshawar
- 4 District Accounts Officer Peshawar (to report that the bills of the above named candidates my not be honor till the verification of their certificates / Degrees etc. from the concerned authorities duly authenticated by the District Controller)
- 5 P.S.O to District Nazim Peshawar
- 6 PS to District Coordination Officer Peshawar
- 7 Dy. District Officer concerned along with (to comply with the request / agreement) with the request that to verify all original certificates / degrees etc. to be submitted to the concerned authorities and compare these with the mark list found in the files of the concerned authorities at the later stage filling with they will be passed by hand to the concerned authorities. They are further directed to furnish a certificate that physical certificate is sent to the bank and also mentioned in the certificates :-

(A) - Bogus case = 1/11  
OR  
(B) - Name of Candidates with their names and details of certificates / Degrees and name of AD Examiners / Board / etc. to be submitted to the concerned authorities.

- 8-157 Head Master concerned.
- 158-2/ All candidates concerned.
- 207-1/ ADO (Estab.) / AFO (Accounts) Peshawar concerned.

*[Signature]*  
EXECUTIVE DISTRICT OFFICER,  
SCHOOLS & LITERACY PESHAWAR.  
12/11/04

*[Signature]*  
PRINCIPAL  
Govt. Higher Secondary School  
No.3, Peshawar City.

~~ATTESTED~~

95	1081	Zeenat Bibi D/O Wall Jan R/O Mathra Peshawar	6	12/1/01	1984	GGPS Pili Baja	do
<b>Union Council # 89 Kaniza</b>							
96	787	Gul Meena D/O Shehulahi R/O Shoikh Kuli Warsak Khazana Road Peshawar	1	05/01/1979	1984	GGPS Shekhi Kuli	do
97	683	Ulfat Bibi D/O Khala Khan R/O Nisalla Baja Peshawar	2	03/02/1965	1984	GGPS Shekhi Kuli	do
98	453	Shahida Parveen D/O Syed Sarwar Shah R/O Shahinda Charpriza Peshawar	3	01/01/1979	1984	GGPS Kaniza	do
<b>Union Council # 90 Chaghar Matti</b>							
99	1202	Gul Naz Hayat D/O Raza Khan R/O Vill Haryana Garh Peshawar	3	30/7/70	1984	GGPS Pili Kuli	do
100	813	Badqat Ameen D/O Muhammad Ameen R/O Vill Haryan Garh Peshawar	4	05/01/1965	1984	GGPS Pili Kuli	do
101	137	Shahida Zafar D/O Zafar Khan R/O No. 1 Chaghar Matti Peshawar	5	12/1/01	1984	GGPS Chaghar Matti	do
102	79	Gul Bano D/O Shafullah Vill Chaghar Matti	6	03/01/1973	1115	GGPS Chaghar Matti	do
103	302	Dishad Begum D/O Khawaa Khan R/O Barbar Abozal Bala Peshawar	7	20/7/79	4011	GGPS Kuda	do
<b>Union Council # 82 Mera Kachori</b>							
104	113	Shazia Begum D/O Zafar Gul R/O Gathi Rashida Jhagra Peshawar	1	01/03/1970	5031	GGPS Jagra Malogo	do
105	43	Zobcon Shakoor D/O Amanullah Khan R/O Kundli Hayat Jagara Pesh:	2	26/4/83	1984	GGPS Jagra Malogo	do
<b>DISABLE QUOTA</b>							
106	204	Ghazala D/O Shah Zaman Moh. Wali Abad O/S Yakhtou Peshawar	1	12/01/1979	1984	GGPS Kakshal No. 2 Moh. Wali Abad	do

**TERMS & CONDITION:**

1. They will be governed by the conditions and regulations as prescribed by the Government from  
for details.

**ATTESTED**

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER (MIDDLE & LITERACY) PESHAWAR.**  
**APPOINTMENT.**

Consequent upon the selection by the District Selection Board Committee the following PTC Trained (Female) candidates are hereby appointed on contract basis in 10% of G.G.P.S. 2220/- P.M. plus usual allowances as admissible under the rules for 10% posts with from the date of their taking over charge in the school noted against each subject to the following terms and conditions:

S.#	R.#	Name of Candidates with Father Name and Address	Merit #	D.O Birth	Score	Posted at	Remarks
<b>25 % OPEN</b>							
1	596	Dursamino D/O Sharif Khan R/O Bashir Abad Pajagi Road Peshawar	1	07/01/1981	75.01	GGPS Raqi Chini	Against Vacant Post
2	180	Nagina D/O Imdad Hussain R/O H. No.2171 Moh. Tehlan Tehlan Goghatri Peshawar	2	02/00/1970	80.02	GGPS Wazir Bagh No.1	.....do....
3	20	Nusrat Begum D/O Khalebi Gul R/O Moh: Ijaz Abad Charadda Road	3	14/2/77	80.98	GGPS Tandi	.....do....
4	70	Robina Shaheen D/O Mohammad Ashiq Moh: Muslim Abad Kokohal Pesh	4	01/03/1977	80.34	GGPS Kakhal No.2, Quaid Ahad	.....do....
5	541	Naeem Shaheen D/O Lal Muhammad R/O Qtr No.37 d-IV Inverly Colony Forest College Peshawar	5	20/1/02	58.04	GGPS Raqi No.3	.....do....
6	115	Fouzia Tabassum D/O Pir Bakhtish R/O H-7/A Street No.4 Papal Colony Peshawar	6	07/01/1981	58.00	GGPS Nothia No.2	.....do....
7	800	Maryam Bibi D/O Mian Hamza Khan R/O Str No.3 Gulgaht Colony Peshawar	7	11/08/1980	58.02	GGPS Nothia No.2	.....do....
8	814	Nadia Nawaz D/O Haq Nawaz R/O Haryan Garh Peshawar	8	14/3/77	58.40	GGPS <b>PRINCIPAL Govt. Higher Secondary School No.9, Peshawar City.</b>	.....do....
9	487	Rizwana Nawaz D/O Muhammad Nawaz R/O Str No 4 Faisal Colony Dalazak Road Peshawar	9	19/7/77	58.14	GGPS Nasir Pur	.....do....
10	377	Bushra D/O Arsalan Khan R/O Moh Afridi Khan Shuh Gabool Peshawar	10	02/08/1982	58.10	GGPS Wazir Bagh No.1	.....do....

**ATTESTED**

Annexure - B -

**GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(REGULATION WING)**

**NOTIFICATION**

Dated Peshawar, the 06/07/2020

In exercise of the powers conferred by section 26 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973) the Chief Minister of Khyber Pakhtunkhwa is pleased to direct that in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the following further amendment shall be made, namely:

**AMENDMENT**

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

**CHIEF SECRETARY  
GOVERNMENT OF THE KHYBER PAKHTUNKHWA**

**EXIST NO & EVEN DATE**

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



**ATTESTED**

*W. J. Latif*  
**(WAJDAH LATIF)  
DEPUTY SECRETARY (POLICY)**

*M. I. Khan*

**ATTESTED**

-12-

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(REGULATION WING)

NOTIFICATION

Dated Peshawar the, 05/08/2020

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~~

-13-

Annexure - C



GOVERNMENT OF KARNATAKA  
ESTABLISHMENT DEPARTMENT  
No. SP/Secy/HR/AD/1/2020  
Dated: February 06, 2023

62

To  
The Government of Karnataka  
Secretary & Secondary Education Department.

Subject: QUANTUM IMPROVING INITIATION OF HULAK JIS IN THE  
KARNATAKA PAKISTAN CIVIL SERVICES (APPOINTMENT,  
PROMOTION AND TRANSFER) RULES,  
1989 AND THE APPEAL RULES, 1989.

Dear Sir,  
I am directed to refer to your letter No. SO(Primary-MY/MS/1077-  
2/Appeal/2023) dated 16.01.2023 on the subject stated above and to state that Sub-Rule  
(3) of Rule-7 of Mysore Panchayats Civil Services (Appointment, Promotion and Transfer) Rules, 1989 stands deleted with this experimental notification dated 06.08.2016. In view of  
provision exists to decline or forgo promotion.

The basic rationale behind the deletion of the said rule is aimed at preventing a  
dual career from termination for JHS/HS by sticking to a single alternative post/promotion or to  
prevent those who tend to forgo promotion to evade post/transfer or share 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.

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 Mysore Panchayats Civil Services (Efficiency & Discipline) Rules,  
2011, please.

Yours faithfully,  
  
Section Officer (HR)

Encls. 01 Letter No & 10

Copy forwarded to:-

1. PG to Special Secretary (HR), Establishment Department.
1. PA to Additional Secretary (Secy-III), Establishment Department.
1. PG to Deputy Secretary (Policy), Establishment Department.

16.02.23  
vs 216/23

~~ATTACHED~~

WSP/447-2023 AZIZULLAH VS GOVT OF KGA



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
CIVIL SECRETARIAT PESHAWAR  
(Phone No.091-8223507)

No.50 (Primary-M)/E&SED/2-8/2023  
Lahor Peshawar the June 26<sup>th</sup> 2023

To  
The Director  
Elementary & Secondary Education Department  
Khyber Pakhtunkhwa, Peshawar.  
  
Aztz Ullah Khan  
President  
All Primary Teacher's Association, KP

*[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 here with  
a letter of Establishment Department letter No. 50 (Policy)E&AD/1-3/2020 dated  
08 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.

End: AA

*[Handwritten initials]*

*[Signature]*  
(MUHAMMAD ISHAQ)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

*[Handwritten initials]*

*[Signature]*  
SECTION OFFICER (PRIMARY MALE)  
26/6/23

~~ATTACHED~~



B/c

No SO (Primary-M)/B&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/1-3/2020 dated 05 June, 2023 and to state  
that the subject meeting is to be held on 06 July, 2023 at 11:00 AM in this department under the  
Chairmanship of Additional Secretary (Estab) E&SE Department in his office.

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

Encl: AA

(MUHAMMAD ISHAQ)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

SECTION OFFICER (PRIMARY MALE)

WP4442-2023 AZIZULLAH VS GOVT OF PK43

~~TESTED~~

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

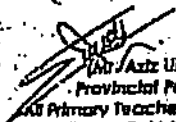
Sl	NAME	DESIGNATION
1	Mr. Fazal Wahid	Deputy Director Establishment of Directorate Elementary & Secondary Education Department
2	Mr. Aziz Ullah	Provincial President All Primary Teachers Association Khyber Pakhtunkhwa
3	Mr. Razaqat Ullah	General Secretary APTA Peshawar
4	Muhammad Ishaq	Section Officer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

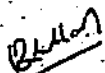
2. The meeting started with recitation from The Holy Quran. The chair welcomed the participants. The Deputy Director (Establishment) of Directorate of Elementary & Secondary Education briefed the forum regarding agenda item in detail.


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

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

  
(Mr. Fazal Wahid)  
Deputy Director-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

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

  
TESTED

-17-

-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(S) IN THE CIVIL SERVANT (APPOINTMENT, PROMOTION & TRANSFER RULES 1989).**

A meeting regarding the subject matter was held on 05-07-2023 at 11:00 AM under the Chairmanship of Additional Secretary Establishment in his office. The following attended the meeting

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

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

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

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

(Mr. Fazal Wahid)  
Deputy Director-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**

~~ATTESTED~~

W/1443-2023 ARZULAH VS GOVT CP F043

Assistant Director (Exhibit-1)  
Ministry of Secondary Education  
Khyber Pakhtunkhwa

Assistant Director (Exam A-1)  
Ministry of Secondary Education  
Khyber Pakhtunkhwa

17/1/2023

The case is submitted for perusal and necessary actions please.

Departmental Promotion Committee.

Teachers below 15-16 may be exempted of implications of the amendment in the rules laid 7(1) have affected adversely a huge number of Female Teachers. Thus it is proposed that in view of the above, the office is of considered opinion that the date of issue of order been asked for submission of consolidated case.

Chairman/Member of Promotion Committee of this office has that in the light of the minutes of meeting dated 6-07-2022 held under the (Promotion) 40/2022 dated 12-02-2022.

The same was received by this office from your good office vide letter No.50 that there shall be no provision in terms of age promotion. It is obliging upon every (When) vide letter No.50 (Promotion) dated 6-06-2022 respectively stated that the Government of Khyber Pakhtunkhwa Establishment Department (Regulation No.50 (Promotion) 40/2022) for necessary guidance.

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

(ii) It is the prerogative of the civil service to either accept or turn down the offer of promotion.

Now it is proposed upon the civil service to accept promotion in every condition. No.50 dated 02-02-2022.

That the office should guide from your good office in the following words vide letter vide letter No. 50 (Promotion) 40/2022 dated 06-09-2022.

dated Rule 7(1) (a) Civil Service (Appointment, Promotion & Transfer Rules 1982) that Government of Khyber Pakhtunkhwa Establishment Department (Regulation (When) vide letter No. 50 (Promotion) 40/2022 dated 06-09-2022) on the subject cited above and to present brief history within the background of the case as under.

I am directed to refer to the letter No.50 (Promotion) 40/2022-11

Subject: - MINUTES OF THE MEETING

Khyber Pakhtunkhwa Education  
Ministry of Secondary Education Department  
Khyber Pakhtunkhwa

The Station Officer (Primary School)

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



No. 8145

Khyber Pakhtunkhwa, Peshawar  
Date: 17/1/2023  
Email: [education@pkp.gov.pk](mailto:education@pkp.gov.pk)

ATTESTED

WP443-2023 AZZULAH VS GOVT OF PAK

Copy of the above to:  
1. PA to Director Local Directorate  
2. Master Copy  
Asst. Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

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

That in light of the minutes of the meeting dated 6-07-2023  
held under the chairmanship of Hon. Additional Secretary, Education  
Department of this office. This office has been asked for submission of  
ment of at his office.

That the government of KP-ED (Regulation Wing) vide letter No. SD (Policy)  
EQAD/1-2/2020 dated 6-06-2023 accordingly stated that there exists  
no provision to declare / give promotion. It is obligatory upon every civil  
servant to accept promotion under any condition.

That your good office forwarded the same to quater concerned  
vide letter No. SD (Policy) EQAD/1-2/2020 for necessary  
guidance -  
That the government of KP-ED (Regulation Wing) vide letter No. SD (Policy)  
EQAD/1-2/2020 dated 6-06-2023 accordingly stated that there exists  
no provision to declare / give promotion. It is obligatory upon every civil  
servant to accept promotion under any condition.

That this office sought guidance from your good office in the following  
vide notification No. No. SDP-VI (EQAD)-1-3/2020 dated 06-08-2020.  
dated vide 7(S) in Civil Servants (Appointment, Promotion, Transfer, etc.)  
That Government of KP Establishment Department (Regulation Wing)  
present brief history, about background of case as under:-

I am directed to refer to letter No. (SD Policy - M) EQAD/1-2/6/2020/  
Minutes of meeting 11/3/2023 dated 10-7-2023 on subject cited above and to  
Subject: Minutes of Meeting  
KPK, Peshawar.  
Elementary & Secondary Education Department  
Section Officer (Policy - Male)  
KPK, Peshawar

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

-B/C-  
-19-



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

No: SO(Policy-M)E&SED/2-2/Appointment-Rule /2023  
Peshawar Dated 23<sup>rd</sup> August, 2023

Annexure  
E

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  
06<sup>th</sup> June 2023 and to state that after deletion of rule 7(5) Khyber Pakhtunkhwa Civil  
Servant (Appointment, Promotion & Transfer Rules 1989) it has been intimated that those  
officers/ officials who do not comply with promotion order of the competent authority or  
try to evade promotion through different means shall be proceed under Khyber  
Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules, 2011.

2. In this connection it is submitted that in some cases lady teacher of primary  
level who avail such promotions have to face serious inconvenience while they have to  
perform duties in the remotest station with no residential or transport facility. Most of  
them are married with kids and elder father of mother-in-law who need care. In such  
cases, there are negative effects on service delivery.

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

(MUSHAHIDAN) (S&A)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

SECTION OFFICER (PRIMARY MALE)  
20/8/23

Scanned with CamScanner

ATTESTED

~~ATTESTED~~

(Muzhammad Ishaq)  
Section Officer (Army)  
Muz

1. Director, E & SE Kyber Pakhtunkhwa  
2. PS to Secretary, E & SE Department, Peshawar

Copy forwarded to,  
In view of above, the said amendment may be reconsidered to  
the extent of lady 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 lady  
different means shall be proceed under Kyber Pakhtunkhwa  
Civil Servant (Efficiency and Discipline) Rule 2011.  
of the competent authority or try to evade promotion through  
those officers/officials who do not comply with promotion order  
Promotion and Transfer Rules 1989) it has been intimated that  
dation of Rule 7(S) Kyber Pakhtunkhwa Civil Servant (Appointment,  
1-3/2023 dated 6th June 2023 and to state that after  
I am directed to refer to your letter No. S/Army  
(Peshawar) 124/AD

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

The Secretary to Government of Kyber Pakhtunkhwa,  
Establishment and Administration Department,  
Peshawar.

To  
No. S. (Army - M) E & SE/18-21  
Appointments - Rule/2023  
Peshawar Dated 23rd August, 2023.

-8/c-

-91-

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

Dear Sir,  
I am directed to refer to your letter No. SO(Primary-M)/E&SED/2-  
2/Appointment-Rule/2023 dated 23.08.2023 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.

MP442-2023 AZIZULLAH VS GOVT OF KP  
ATTESTED



-23-

-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,  
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 tendered to your good office vide this department letter of even  
No. dated 06.06.2023 (copy enclosed).

Yours faithfully,

Section Officer (Policy)

Encls. Of even No & date

Copy forwarded to the:-

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

Section Officer (Policy)

~~TESTED~~

-24-

Annexure 'G'

To,

Dated: 02/2024

- 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

**REPRESENTATION AGAINST THE IMPUGNED NOTIFICATION BEARING NO.SO(POLICY)E&AD/1-312020. 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. 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. 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.

Best Regards



Gul Mina wife of Tajamul Hussain  
Resident of Tehsil & District Peshawar

TESTED

WP4442-2023 AZIZULHAQ VS GOVT OF PUNJ

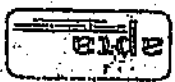
Handwritten signature and date 08/11/23

Main body of handwritten text in Urdu script, appearing to be a legal document or affidavit.

Handwritten signature at the bottom of the main text block.

Annexure - H

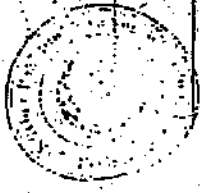
APTA House  
Govt. Primary School No.4  
Gulshar Park, Faisalabad, Punjab, Pakistan



Atty. General, Punjab High Court

Production  
0222, 0212540  
01 Faisalabad

07.05.2024



1. Learned counsel for the appellant present.
2. Let a pre-admission notice be issued to the respondents through FCS for submission of reply-comments. Appellant is directed to deposit FCS expenses within three days. To come up for reply-comments as well as preliminary hearing on 10.06.2024 before S.J. (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 (I)

*[Handwritten signature]*

Date of Presentation of Application 10-5-24  
 Number of 5/1  
 Copies 5/1  
 Upan 5/1  
 Total 5/1  
 Name of 18-6-22  
 Date of 19-6-24  
 Date of receipt of copy 19-6-24

*[Handwritten signature]*  
**ATTESTED**

# VAKALAT NAMA

## BEFORE THE SERVICE TRIBUNAL PESHAWAR

GUL MINA

Appellant

Versus

Government of KP & others

Respondents

I (the Appellant)

do hereby appoint and retain

MUHAMMAD MUAZZAM BUTT ASC. MUHAMMAD ADEEL BUTT AHC

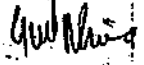
BASSAM AHMAD SIDDIQUI AHC

&

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