

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

CM Petition _____/2024

In Service Appeal No. 2590/2023

Zain ud Din Versus Govt. of KPK etc

Service Appeal

INDEX

S. No.	Particulars of documents	Annexure	Page
1.	Grounds of CM Petition with affidavit	--	1-2
2.	Copy of verification letter dated 07/08/2023	I	3
3.	Copy of notification dated 10/07/2024	II	4
4.	Copy of notification dated 28/10/2021	III	5
5.	Copy of notification dated 13/12/2023	IV	6

Dated: 25 /07/2024


Asad Aziz Mahsood
Advocate High Court

Humble Appellant


Zain ud Din
Through Counsel

31-07-24

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

CM. Petition _____/2024

In Service Appeal No. 2590/23

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 14575

Dated 29-07-24

Zain ud Din Versus Govt. of KPK etc

Service Appeal

APPLICATION FOR ALLOWING THE APPELLANT TO PLACE
CERTAIN DOCUMENTS ON FILE

Respectfully Sheweth:-

That appellant humbly submits as under:-

1. That the above titled service appeal is pending adjudication in this Honourable Tribunal.
2. That at the time of filing of above titled appeal, some important documents were not annexed by the appellant which are necessary to be brought on file.
3. That the case of appellant totally depends upon the above mentioned documents.
4. That this honourable tribunal has got vast and ample powers to accept the instant application.

It is therefore, humbly requested that the appellant may kindly be allowed to place some important documents on judicial file.

Dated: 15/07/2024

Humble Appellant

**Zain ud Din
Through Counsel**

**Asad Aziz Mahsood
Advocate High Court**

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

CM Petition _____/2024

In Service Appeal No.

Zain ud Din Versus Govt. of KPK etc

Service Appeal

AFFIDAVIT

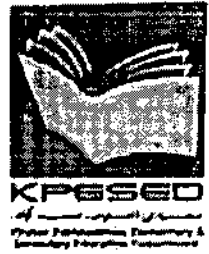
I, **Asad Aziz Mahsood AHC**, counsel for the appellant, do hereby solemnly affirm and declare on oath that contents of above CM petition are true & correct and that nothing has been concealed from this Honourable Court.


DEPONENT

25/7/24



Government of Khyber Pakhtunkhwa
Office of the District Education Officer, Male
SOUTH WAZIRISTAN



NO_10167_/ DATED _07_/_09_/2023

To

The Section Officer (Management Cadre)
Elementary & Secondary Education Department,
Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.

Annexure
(I) (3)

Subject: VERIFICATION LETTER DATED 07.08.2023

Memo:

Reference you letter No.50(MC) E&SED/4-16/2023/Zain Ud Din Dated 7th September 2023 on the subject cited above and to state that after checking the record of this office, it is submitted that the attached letter of DEO (M) South Waziristan office bearing No.9790 Dated 07.08.2023 received with your office No. quoted above, is not found in the dispatch / issue register of this office nor issued under the signatures of the undersigned; hence may be treated as null and void please.

27/09/23
DISTRICT EDUCATION OFFICER (M)
SOUTH WAZIRISTAN

APR 2023
★



Amir II

(4)

**DIRECTORATE OF ELEMENTARY &
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA, PESHAWAR**

NOTIFICATION

Consequent upon the relaxation of ban and approval of the Competent Authority (Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar), the transfer/posting of the following Officers/officials are hereby ordered in their own pay & scale with immediate effect in the best interest of public service with the following terms and conditions:-

S#	Name & Designation	Place of present posting	Where posted as	Remarks
1	Muhammad Sharif ADEO/SST	ADEO (P&D) at the Office of District Education Office (M) Darazinda D I Khan.	Service are placed at the disposal of District Education Officer(M) D I Khan	For further posting against vacant SST post
2	Mr.Khan Wazir T.T	GPS Ilyas Khizai Sub Division Darazinda District D I Khan	ADEO (P&D) at the Office of District Education Office(M) Darazinda D I Khan	Vice.S.No.1

TERMS AND CONDITIONS

1. Charge reports should be sent to all concerned.
2. No TA/DA etc. are allowed.
3. The order of the above named SSTs/TT against the posts of ADEO/ASDEOs will be effective subject to the condition that they will give an under taking on judicial stamp paper to the District Education Officers concerned to the effect that they will neither claim the seniority of ADEO/ASDEO Post nor absorption in Management Cadre.
4. The terms and conditions mentioned in his appointment/promotion order as SST (Teaching Cadre) will remain intact.

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa

Endst: No. 8286-89 /A-12 F.No.27 (A)/ADEO (M) Dated Pesh. the 10-07-2024

Copy forwarded to the:-

- 1 District Education Officer D I Khan.
- 2 District Accounts Officer D I Khan.
- 3 Officials concerned.
- 4 PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.

(Zia Ullah)
Assistant Director (Estab)(m)
Elementary and Secondary Education
Khyber Pakhtunkhwa

10/7/24

(1)

Al Husein
★



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223533

Annexure III

5

Dated Peshawar the October, 28 2021

NOTIFICATION

NO.SO(SM)E&SED/7-1/2021/PT/G/MC : The Competent Authority is pleased to order the transfer of the following Officers/Teachers of Elementary & Secondary Education Department, in the best public interest, with immediate effect:-

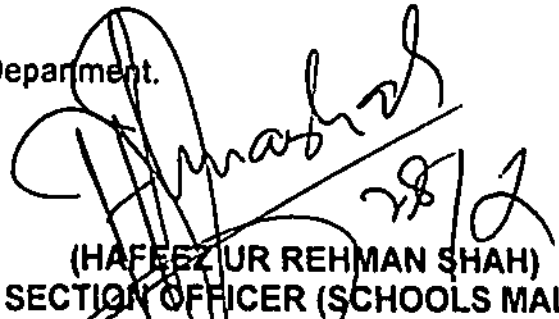
S#	Name of officer & designation	From	To
1.	Mr. Sher Muhammad (TC BS-18)	Deputy District Education Officer (M) South Waziristan	SS (History/Civics) BS-18 GHSS Doaba District Hangu against the vacant post.
2.	Mr. Khayal Muhammad (TC BS-17)	Headmaster (BS-17) GHS Nawaz Kot South Waziristan	Deputy District Education Officer (M) South Waziristan in OPS vice S.No. 01.
3.	Mr. Inayat Ullah (TC BS-17)	SS (Maths) BS-17 GHSS Ashkar Kot South Waziristan	SDEO (M) Sub Division Sarwakai South Waziristan against the vacant post.
4.	Mr. Abdul Samad (TC BS-17)	Headmaster (BS-17) GHS Sararogha South Waziristan	SDEO (M) Sub Division Ladha South Waziristan against the vacant post.

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No. & Date

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male) concerned.
4. District Account Officers, Concerned.
5. Director, EMIS E&SE Department.
6. PS to Minister for E&SE Department.
7. PS to Secretary E&SE Department.
8. PA to Deputy Secretary (Admn) E&SE Department.
9. Officers concerned.
10. Office order file.


(HAFEEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS MALE)

Attested

