


FORM OF ORDER SHEET

Court of _____

Appeal No. 2130 /2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/10/2024	<p>The appeal presented today by Mr. Muhammad Muazzam Butt Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 01.11.2024. 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

Muhammad Khalid

ANo: 2130/24

V/S

Government of KP & others

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ADVOCATE

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA.

In Ref to

Service Appeal No. 2130 /2024

Muhammad Khalid Son of Abdul Khaliq Resident of Tehsil & District Manshera

Designation: Primary School Teacher at GPS Chitta Batta

.....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 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:-

GROUND:-

- 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 set aside.

- e. That non-availing of promotion and foregoing thereof does not cause loss to the government exchequer and in consequence of foregoing promotion, pave way to the next employee in seniority, aspiring for promotion could be promoted.
- f. That the impugned promotion Notification dated 06/08/2020 communicated on 06/06/2023 is perverse, discriminatory, against the law, pungent and is a blunt blow of hammer on the rights of the appellant. It is not out of place to mention here that the appellant are teachers and have to look after their children as well as ailing dependent family members and in these circumstances in the presence of impugned Notification dated 06/08 /2023 communicated on 06/06/23 would not be able to serve in the department and which shall amount to the snatching of bread and butter of the poor employees


It is, therefore, humbly prayed that on the acceptance of the instant Service Appeal; the impugned Notification bearing No. SO (POLICY) E&D/1-3 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.


AFFIDAVIT:

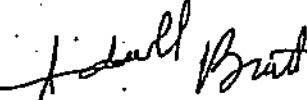
I Muhammad Khalid Son of Abdul Khaliq Resident of Tehsil & District Manshera do hereby solemnly affirm and declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court

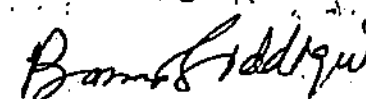

Deponent


Appellant

Through


Muhammad Muazzam Butt
Advocate Supreme Court


Muhammad Adjeel Butt
Advocate High Court


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

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA

C.M No. _____ -P of 2024

In Ref to

Service Appeal No. _____ /2024

MUHAMMAD KHALID

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 from this Honourable Court

[Signature]
Deponent

Through

[Signature]
Appellant

[Signature]
Muhammad Muazzam Butt
Advocate Supreme Court

[Signature]
Muhammad Adeel Butt
Advocate High Court

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Dist. Govt. KP-Provincial
District Accounts Office Manshra
Monthly Salary Statement (December-2023)



Personal Information of Mr MUHAMMAD KHALID d/w/s of ABDUL KHALIQ

Personnel Number: 00224206

CNIC: 1350306201245

NTN:

Date of Birth: 28.03.1972

Entry into Govt. Service: 01.03.1993

Length of Service: 30 Years 10 Months 001 Days

Employment Category: Active Temporary

Designation: PRIMARY SCHOOL TEACHER

80990949-DISTRICT GOVERNMENT KHYBE

DDO Code: MA6373-Manshra

Payroll Section: 001

GPF Section: 001

Cash Center: 7

GPF A/C No: EDUMA009415

GPF Interest applied:

GPF Balance:

1,250,444.00 (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
2148	15% Adhoc Relief All-2013	950.00	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 At 15% 22(PS17)	6,807.00	2378	Adhoc Relief All 2023 35%	24,311.00

Deductions - General

Wage type		Amount	Wage type		Amount
3015	GPF Subscription	-4,290.00	3501	Benevolent Fund	-1,200.00
3609	Income Tax	-3,005.00	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: 46,846.38

Recovered till DEC-2023: 17,105.00

Exempted: 11711.56

Recoverable:

18,029.82

Gross Pay (Rs.): 122,056.00

Deductions: (Rs.): -9,230.00

Net Pay: (Rs.): 112,826.00

Payee Name: MUHAMMAD KHALID

Account Number: PLS 3130-4

Bank Details: NATIONAL BANK OF PAKISTAN, 231487 HAZARA UNIVERSITY HAZARA UNIVERSITY, DHODIAL
 MANSEHRA

Leaves:

Opening Balance:

Availed:

Earned:

Balance:

Permanent Address: MANSERA

City: MANSEHRA

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: mkhalid8721@gmail.com

(Handwritten signature)

17-6-013

3
SN #1374
S #74



Office of the
District Education Officer,
(Male) Manshera
Phone # 0997-306271-72

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CORRIGENDUM

In continuation of this Office Endstment No 3101-3921 dated 30/05/2013 , On the acceptance of appeals and approved by the competent authority the following corrigendum order PSHT on U C wise sonority bases, is here by made in the interest of public service with immediate effect. All the corrigendum orders after 30/05/2013 be considered as canceled as they have included in this order.

S.#	S.L#	Name of Teacher	Name of School	Name of UC	Circle	Place of Posting	Remarks	Correction of Circle
1	360	MUHAMMAD ISMAHEEL	GPS MARI SHAH WALI	HAMSHERIAN	BAFFA	GPS MARI SHAH WALI	AO	BAFFA
2	533	MUHAMMAD MUMTAZ	GPS BANDI GIAN	BHERKUND	BAFFA	GPS HARI MARA SHERGAR	OUT CIRCLE	BAFFA
3	1096	ANWAR KHURSHID	GPS CHIRI KOT	SHAUKAT ABAD	BAFFA	GPS MAINA GALI	OUT CIRCLE	BAFFA
4	451	WASIM AHMED	GPS BAFFA MAIRA NO.2	BAFFA	BAFFA	GPS HAIR PAIAN	OUT CIRCLE	BAFFA
5	520	EJAZ HUSSAIN	GPS KHAKI	BHERKUND	BAFFA	GPS JHANGAN	SAME U.C	BAFFA
6	755	ABDUR RAESHID	GPS MARI SHAH WALI	HAMSHERIAN	BAFFA	GPS MORI DHODIAL	OUT CIRCLE	BAFFA
7	750	MUHAMMAD ARIF KHAN	GPS KHAWAJGAN	MALIK PUR	BAFFA	GPS MALKANI	OUT CIRCLE	BAFFA
8	781	ABDUL WAHEED	GPS KHAWAJGAN	MALIK PUR	BAFFA	GPS BATANGI NO 2	OUT CIRCLE	BAFFA
9	785	MUHAMMAD AKHTIR	GMPS DAB MARAO PUR	MALIK PUR	BAFFA	GPS RARI JANDA	OUT CIRCLE	BAFFA
10	951	SHABIR MUHAMMAD	GMPS KACHI	BHERKUND	BAFFA	GPS JABBIAN	OUT CIRCLE	BAFFA
11	861	NAZ MUHAMMAD	GPS TRANGRI BALA	TRANGRI SABIR SHAH	BAFFA	GPS KALIS NAWAZ ABAD	OUT CIRCLE	BAFFA
12	982	MUHAMMAD NIAZ	GPS LAL DARA	SHAUKAT ABAD	BAFFA	GPS CHAR	SAN	BAFFA
13	998	MUHAMMAD KHALID	GPS MURAD PUR	MALIK PUR	BAFFA	GPS NAROOLI	OUT CIRCLE	BAFFA
14	1027	HUSSAIN AHAMAD	GPS GHAFOR JABRI	TANDA	BAFFA	GPS PATTIAN	OUT CIRCLE	BAFFA
15	1130	SALEEM KIAN	GPS BAJNA	TANDA	BAFFA	GPS GRANTHALI	OUT CIRCLE	BAFFA
16	1182	ARSHAD FAROOQ	GMPS KANIAT	HAMSHERIAN	BAFFA	GPS SHAMALALEY	OUT CIRCLE	BAFFA
17	1211	MUHAMMAD IQBAL	GPS AFZAL ABAD GIDDER PUR	SHAUKAT ABAD	BAFFA	GPS KAYAIAN	OUT CIRCLE	BAFFA
18	1325	MUHAMMAD SIDDIQUE	GPS BAFI MERA NO.1	BAFFA	BAFFA	GPS CHANIR KOT	OUT CIRCLE	BAFFA
19	1351	MOHAMMAD SADAQAT	GPS BHER KUND MERA	BHERKUND	BAFFA	GPS KIAMAL	OUT CIRCLE	BAFFA
20	1425	MUHAMMAD BASHIR	GPS BAJNA	TANDA	BAFFA	GPS HAIR BALA	OUT CIRCLE	BAFFA
21	1005	JAVED HUSSAIN	GPS BANDA PIRAN	INAYAT ABAD	BAFFA	GPS KAMAR MARI	OUT CIRCLE	BAFFA
22	1420	MUHAMMAD SALEEM	GMPS LUNG	INAYAT ABAD	BAFFA	GPS PANGORI	OUT CIRCLE	BAFFA
23	80	ABDUL MANAN SHAD	GPS SHOHAL NAJAF KHAN	BALAKOT	BALAKOT	GPS SHOHAL NAJAF KHAN	AO	BALAKOT
24	100	MUHAMMAD MUHAMMAD	GPS SHUHAL NAJAF KHAN	BALAKOT	BALAKOT	GPS DANNA SHOHAL	S.U.C	BALAKOT
25	334	MUHAMMAD ASHRAF	GPS JABI HAIDAR	GHARI HABIB ULLAH	BALAKOT	GPS SINGAL DHERI	S.U.C	BALAKOT

~~ATTACHED~~

26	891	ISHTIAQ AHMED SHAH	GPS ROH	GHARI HABIB ULLAH	BALAKOT	GPS BALA PARIS	OUT CIRCLE	BALAKOT
27	1071	M.ABDUL KARIM	GPS JAGHEER	GHARI HABIB ULLAH	BALAKOT	GPS DHARI BALA SACHA	OUT CIRCLE	BALAKOT
28	1219	SAJJAD AHMED MUHAMMAD	GPS ROH	GHARI HABIB ULLAH	BALAKOT	GPS DAMDAMA	OUT CIRCLE	BALAKOT
29	1207	MUHAMMAD HANIF	GMPS SARI NARAL	GHARI HABIB ULLAH	BALAKOT	GPS SERI MANOOR	OUT CIRCLE	BALAKOT
30	187	MUHAMMAD AKRAM	GPS TRADA BANDI	KARNOL	BALAKOT	GPS TRADA BANDI	AO	BALAKOT
31	541	MUHAMMAD YAQOOB	GPS LISHKIARA	KARNOL	BALAKOT	GPS LISHKIARA	AO	BALAKOT
32	594	MUHAMMAD TARIQ	GPS LOWER BHURAJ	KARNOL	BALAKOT	GPS LOWER BHURAJ	AO	BALAKOT
33	598	ABDUL QAYYUM	GPS TRADA BANDI	KARNOL	BALAKOT	GPS NADI HARI KAGHAN	OUT CIRCLE	BALAKOT
34	803	FAKHAR/ULIJAZ SHAH	GPS KHERABAD	KARNOL	BALAKOT	GPS NIKKIAN KHATER	OUT CIRCLE	BALAKOT
35	1196	WAQAR AHMED	GMPS CHOKI KHER ABAD	KARNOL	BALAKOT	GPS LOHAR BANDA	OUT CIRCLE	BALAKOT
36	150	MEHBOOB UR REHMAN	GPS BATANGI	SHOHAL MAZULLAH	BALAKOT	GPS BATANGI	AO	BALAKOT
37	1386	MUHAMMAD HAROON	GPS NAKA KAWARA	SHOHAL MAZULLAH	BALAKOT	GPS NAKA KAWARA	AO	BALAKOT
38	1427	NIAZ AHMED	GPS SARWAI	TALHATA	BALAKOT	GPS KANARI	OUT CIRCLE	BALAKOT
39	829	MUKHTIAR HUSSAIN	GPS NARAH	SATBANI	BALAKOT	GPS BUTA JARED	ADJUCENT U,C	BALAKOT
40	1240	ABDUL WAHEED	GPS DAKHAN DOGA	KARNOL	BALAKOT	GPS BUTA BALA	ADJUCENT U,C	BALAKOT
41	100	MUHAMMAD FARID	GMPS JABRA KUMI	SHOHAL MAZULLAH	BALAKOT	GPS PATAN DES NO 2	OUT CIRCLE	BALAKOT
42	324	IFTIKHAR BASHIR	GMPS LASMAIRA	GHARI HABIB ULLAH	BALAKOT	GPS GHORAY PHAIR	SAME U C	BALAKOT
43	428	LIQAT ALI	GMPS TOTANKA MOHRI	GHARI HABIB ULLAH	BALAKOT	GPS BAGL CHAR	SAME U C	BALAKOT
44	490	JEHANZEB KHAN	GPS DANNA JAGIR NO.1	KARNOL	BALAKOT	GPS DAKH DI DAKI	SAME U C	BALAKOT
45	495	MUHAMMAD ILYAS	GPS BISSIAN	KARNOL	BALAKOT	GPS HANDA DANA	SAME U C	BALAKOT
46	570	ARSHAD ALLAH	GPS GARHI	GHARI HABIB ULLAH	BALAKOT	GPS KATHA DOBANDI	SAME U C	BALAKOT
47	574	MUHAMMAD BABAR	GPA JAGEER	KARNOL	BALAKOT	GPS NIKKA JAREED	OUT CIRCLE	BALAKOT
48	581	SHAFIQUE UR REHMAN	GMPS JABI HAYDER SHAH	GHARI HABIB ULLAH	BALAKOT	GPS DANA M, JAN	OUT CIRCLE	BALAKOT
49	732	MUHAMMAD RASHID	GMPS GUL DHARI	GHARI HABIB ULLAH	BALAKOT	GPS SERI RAJWAL	SAME U C	BALAKOT
50	748 B	SAJJAD AHMED	GPS ROH	GHARI HABIB ULLAH	BALAKOT	GPS PARIS	OUT CIRCLE	BALAKOT
51	944	IJAZ AHMED	GPS SHAGAI NO.1	GARLAT	BALAKOT	GPS PATTI	OUT CIRCLE	BALAKOT
52	949	IDRAR HUSSAIN	GPS BATORA	TALHATA	BALAKOT	GPS PATHIKKA	SAME U C	BALAKOT
53	987	MUHAMMAD SAEED	GPS JAGIR	KARNOL	BALAKOT	GPS BADAL GRAN	OUT CIRCLE	BALAKOT
54	1084	MUHAMMAD SHAFIQUE	GPS LOGI PARIS	GARLAT	BALAKOT	GPS LOGI PARAS	AO	BALAKOT
55	1200	MUHAMMAD RIAZ	GPS NOR SUM	TALHATA	BALAKOT	GPS ZAMEERI	SAME U C	BALAKOT
56	1205	ADDUR RAUF	GPS DARRAH BALA KOT	BALAKOT	BALAKOT	GPS CHAMBER SANGAR	OUT CIRCLE	BALAKOT
57	1226	MUHAMMAD RAFIQUE	GPS BOLI	BALAKOT	BALAKOT	GPS BOLI	AO	BALAKOT
58	1249	MUHAMMAD ZAMAN	GPS MORI SHOHAL	BALAKOT	BALAKOT	GPS MANG	OUT CIRCLE	BALAKOT
59	1276	HAFIZ UR REHMAN	GPS KHARIAN	BALAKOT	BALAKOT	GPS BALA JAREED	OUT CIRCLE	BALAKOT
60	1280	MANZOOR HUSSAIN	GPS MORE SHOHAL	BALAKOT	BALAKOT	GPS SHALI BANS	OUT CIRCLE	BALAKOT
61	1290	ALI AKBER	GPS MURDUDA	KARNOL	BALAKOT	GPS MURDUDA	AO	BALAKOT
62	1372	ZAHID HUSSIAN	GPS CHATTAR PLAIN	CHATTAR PLAIN	BATTAL	GPS KAPARDHO	SAME U,C	BATTAL

APPROVED
[Signature]

63	531	ABDUL AZIZ	GMPS NAKICA BEESAN	HILKOT	BATTAL	GPS ASHWAL	SAME U C	BATTAL
64	680	WALAYAT KHAN	GPS ICHRIAN	ICHRIAN	BATTAL	GPS DARA LAMI	SAME U C	BATTAL
65	1162	FAZAL UL ISLAM	GPS KOTLY PAIN	ICHRIAN	BATTAL	GPS JAGORI	SAME U C	BATTAL
66	335	MUHAMMAD ASIF	GPS GRANTHALI	BHOGARMANG	DHODIAL	GPS RATHI	ADJUCENT U.C	DHODIAL
67	47	MUHAMMAD SIDDIQUE	GPS DULLA MAIRA	DHODIAL	DHODIAL	GPS CHALAYANI	ADJUCENT U.C	DHODIAL
68	1142	ABDUR RASHEED	GPS MAITHAL	JABORI	DHODIAL	GPS BANDODAR	SAME U C	DHODIAL
69	210	MUHAMMAD HANF	GMPS MAKRIHA MIANA	SHINKIARI	DHODIAL	GPS KANDAR BEDADI	SAME U C	DHODIAL
70	852	JAVED IOBAL	GMPS TAKIA BEDADI	SHINKIARI	DHODIAL	GPS JHANDWAL	SAME U C	DHODIAL
71	557	SARDAR ALI SHAH	GPS KARI SAYDEN	DEVLI JABAR	DHODIAL	GPS SAID ABAD	ADJUCENT U.C	DHODIAL
72	1116	SAJJAD AHMAD	GMPS PIPPEL MAIRA	DHODIAL	DHODIAL	GPS CHAPPRI KHATA	ADJUCENT U.C	DHODIAL
73	454	JAVED IOBAL	GPS MAKRIHA BALA	SHINKIARI	DHODIAL	GPS BAGH	SAME U.C	DHODIAL
74	1374	MOHAMD KHALID M.FD	GPS BAG	SHINKIARI	DHODIAL	GPS CHITTA BATTA	ADJUCENT U.C	DHODIAL
75	561	ABDUR REHMAN	GPS BALA SACHA	HANGRAI	KAGHAN	GPS BALA SACHA	AO	KAGHAN
76	262	MUHAMMAD AFZAL	GPS OCHRI	MOHANDARI	KAGHAN	GPS OCHRI	AO	KAGHAN
77	1223	SHAKIL AHMED	GPS NARAN	KAGHAN	KAGHAN	GPS DONGI SEARI	ADJUCENT U.C	KAGHAN
78	688	MUHAMMAD SADIQUE	GPS DOHAR MANOOR	MOHANDARI	KAGHAN	GPS GUL DHERI	SAME U.C	KAGHAN
79	826	MUHAMMAD NAZIR	GPS SANDHU BALA	MOHANDARI	KAGHAN	GPS LASSA MOHANDARI	SAME U C	KAGHAN
80	983	MUSHTAQ AHMAD MIRZA	GPS KHAJT SARASH	SATBANI	KAGHAN	GPS KATHA RESOO	ADJUCENT U.C	KAGHAN
81	1267	MUSHTAQ AHMAD	GPS PATLANG	SATBANI	KAGHAN	GPS CHAKKA	SAME U C	KAGHAN
82	313	RQSHAN DIN	GPS GARA DOLA	KAWAI	BALAKOT	GPS GARA DOLA	AO	MANSEHRA
83	779	M KHALID	GPS ATTER SHISHA	ATTARSHISHA	MANSEH RA	GPS ATTERSISHA	AO	MANSEHRA
84	1301	IBRAR HUEAIN	GPS JABA	ATTARSHISHA	MANSEH RA	GPS M.B KHURD	ADJUCENT U.C	MANSEHRA
85	897	MAZHAR UL ISLAM	GPS BI CHANTARI	JALOO	MANSEH RA	GPS BI CHANTARI	AO	MANSEHRA
86	1157	M ANWAR SHAH	GPS DHANGRI NO 2	MANSEHRA DEH	MANSEH RA	GPS DARRA	OUT CIRCLE	MANSEHRA
87	552	ZULFIQAR ALI	GMPS TARIDA	BEHALI	MANSEH RA	GPS MOHWALIAN	SAME U.C	MANSEHRA
88	1221	MUHAMMAD SHAIK	GMPS THITHAR	BEHALI	MANSEH RA	GPS MADSERIAN	OUT CIRCLE	MANSEHRA
89	701	JEHANZIB KHAN	GMPS PANYALE	PAIRAN	MANSEH RA	GPS SHAKHILGRI	SAME U C	MANSEHRA
90	242	MUKHTIAR ALI SHAH	GPS MONGAN MACHHI POLE	SANDASAR	MANSEH RA	GPS BALAG BALA	ADJUCENT U.C	MANSEHRA
91	559	ZAHID ISHAQ	GPS ZAFFAR MAIDAN	CITY NO 2	MANSEH RA	GPS BELA MATRAIAN	SAME U.C	MANSEHRA
92	479	MUHAMMAD ROSHAN	GMPS MISKIN ABAD	ATTARSHISHA	MANSEH RA	GPS JABA PALWAN	SAME U C	MANSEHRA
93	1144	RAFAQAT ALI	GPS HUSSANIAN	BEHALI	MANSEH RA	GPS DOTTAL	SAME U C	MANSEHRA
94	024	M ADIB LUGHIMANI	GPS ZAFFAR MAIDAN	CITY NO 3	MANSEH RA	GPS SHALI DADAR	OUT CIRCLE	MANSEHRA
95	507	M SAEED	GPS LAHOR BANDA	CITY NO 4	MANSEH RA	GPS PAKHER 401	OUT CIRCLE	MANSEHRA
96	09	MUHAMMAD AKRAM	GMPS LUNDIAN LABAR KOT	LABARKOT	MANSEH RA	GPS JABRI MAIDAN	ADJUCENT U.C	MANSEHRA
97	234	KHALID MEHMOOD	GPS KOTKAY	LABARKOT	MANSEH RA	GPS BATKAR SHERGAR	OUT CIRCLE	MANSEHRA



133	123	DIL NAWAZ MUHAMMAD	GPS TRANDA GMPS DFEDAL	PERHINA	PHULRA	GPS GALLIAN GPS LUND KHUND	SAME U.C	PHULRA
134	854	SAEED	GPS RIAZ ABAD	PERHINA	PHULRA	GPS ICHRIAN SERIAN	SAME U.C	PHULRA
135	1408	ALI SARWAR TAJ	GPS CHEENA G	PERHINA	PHULRA	GPS AHL NO 2	SAME U.C	PHULRA
136	170	MUHAMMAD JAVED	GPS BANDI GULO.NO1	PHULRA	PHULRA	GPS BANDI GULO NO 1	AO	PHULRA
137	1053	MUSHTAQ AHMED	GPS BANDI KAINTH	SAWAN MAIRA	PHULRA	GPS CHOJA	AO	PHULRA
138	789	WAZIR MUHAMMAD	PERHINA	PHULRA	PHULRA	GPS JANDA	SAME U.C	PHULRA
139	1067	MUHAMMAD	GPS JANDA GMPS MADNI MASJID	PERHINA	PHULRA	GPS JANDA	AO	PHULRA
140	837	KARIM DAD MUHAMMAD	CITY NO 1 CHATTAR PLAIN	CITY NO 1 CHATTAR PLAIN	MANSEH RA	GPS DARA BALA	OUT CIRCLE	PHULRA
141	1380	SAEED MUHAMMAD	GPS RANJA	PHULRA	PHULRA	GPS BEREELA	OUT CIRCLE	PHULRA
142	1129	ISHAQ	GPS DOGA GPS NEW DARBAND	KARNOL	BALAKOT	GPS DOGA GPS NEW DARBAND	AO	BALAKOT
143	1030	LIAQAT KHAN YOUSAF UR REHMAN	GPS MEHRAN	DARBAND	SHERGAR H	GPS KHAND GRAN	AO	SHERGAR
144	1254	MUNIR ALI SHAH	GPS NEW DARBAND	DARBAND	SHERGAR H	GPS GHAR BALA	SAME U.C	SHERGAR
145	777	MUHAMMAD ZAMAN	GPS DOODH KOT	DARBAND	SHERGAR H	GPS GHAR BALA	SAME UC	SHERGARH
146	802	ZAMAN	KOT	SHANAYA	SHERGAR H	GPS BAI BARYAL	SAME UC	SHERGARH

Note: No TA/DA is allowed.
Charge report should be submitted to all concerned.

DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No 6027-6172 Dated 17-6-2013.

Copy for information to the:

1. District Accounts Officer Mansehra.
2. ASDEO (M) Circle Concerned.
3. Teacher Concerned.
4. Office Order file.

SUB DIVISIONAL EDUCATION OFFICER
(MALE) MANSEHRA

~~NOTED~~

APPOINTMENT.

Consequent upon their selection on merit, the following P.T.C. Trained candidates are hereby appointed in BPS (No-7) as 1095/60/1095 Plus usual allowances as admissible under the rules with effect from the date of their taking over charge against the vacant posts in the school in the interest of Public Service.

Sl. No.	NAME & FATHER'S NAME	RESIDENCE	POST APPOINTED	AGENCY
1	HAJID ALI S/O M. MUHAMMAD RAFIQUE	R/O NAIRA	GPS: NAIRA	AGA: VAC: POST
2	IFTIKHAR HUSSAIN SH: S/O MAQDOOL SH:	R/O HAROTE	GPS: HAROTE	AGA: VAC: POST
3	MUHAMMAD HADDOON S/O ABDUL QAYYUM	R/O JAHRI	GPS: JAHRI	AGA: VAC: POST
4	MUHAMMAD BIAZ S/O DURI AMAN	R/O THAKRI	GPS: THAKRI	AGA: VAC: POST
5	WAHEED UR REHMAN S/O MEHDI ZAMAN	R/O HORG	GPS: SHANWAL	AGA: VAC: POST
6	MUHAMMAD ARTIF S/O MUHAMMAD HANAYUN	R/O BAJWA	GPS: BAJWA	AGA: VAC: POST
7	MUHAMMAD MISKEEN S/O ABDUL QAYYUM	R/O HARYALA	GPS: HARYALA	AGA: VAC: POST
8	ASIF JAVED S/O ABDUL RASHID	R/O SANDHAR	GPS: SANDHAR	AGA: VAC: POST
9	ZUBAIR S/O HAZ MUHAMMAD	R/O RAJMOUL	GPS: RAJMOUL	AGA: VAC: POST
10	ABDUL HAMEED S/O AHMAD DIN	R/O GARIHALA	MSQ: GARIHALA	AGA: VAC: POST
11	MUHAMMAD SALEEM S/O ABDUL QADUS	R/O BAHAR KHAN	OGPS: BAHAR KHAN (R.D.)	AGA: VAC: POST
12	MUHAMMAD SAIED S/O GHULAM SARWAR	R/O KASHI PARI	MSQ: KASHI PARI (R.D.)	AGA: VAC: POST
13	JAL KHAN S/O ABDUL REHMAN	R/O CHITRA	MSQ: CHITRA (R.D.)	AGA: VAC: POST
14	SHABIR HUSSAIN S/O MUHAMMAD AMIN	R/O ICHERAN	GPS: SOOR ASHRAF (R.D.)	AGA: VAC: POST
15	MUHAMMAD BIAZ S/O MAQDOOL UR REHMAN	R/O SERI KHARYAL	GPS: GARI MADARHEI (R.D.)	AGA: VAC: POST
16	SAIDAR S/O MUHAMMAD USAR	R/O TARAKHAR	MSQ: PURANA BHOGARNDH	AGA: VAC: POST
17	MUHAMMAD AJMAL S/O JAMAL DIN	R/O NANDAL	MSQ: BANDI BALA	AGA: VAC: POST
18	ZULFIQAR AHMAD S/O ABDUL REHMAN	R/O MANGLOOR	GPS: CHAMBAR	AGA: VAC: POST
19	MERAJ AHMAD S/O MUHAMMAD ILYAS	R/O BEHALI	GPS: PATYAN	AGA: VAC: POST
20	MUHAMMAD SAIED S/O KALOO KHAN	R/O DOGA	MSQ: NAHAN	AGA: VAC: POST
21	MUHAMMAD ASHRIF S/O SHER MUHAMMAD	R/O SENRI BALA	MSQ: LARI BALA	AGA: VAC: POST
22	MUHAMMAD IQBAL S/O MUHAMMAD SIN	R/O SHITRAHI	MSQ: BELA PARA	AGA: VAC: POST
23	MUHAMMAD YOUSAF	R/O DATKAR	GPS: BATDA	AGA: VAC: POST
24	MUHAMMAD AKRAM	R/O TARAKHAR	GPS: DOONG	AGA: VAC: POST
25	MUHAMMAD MISKEEN	R/O NEHR KOTE	GPS: KOHALI	AGA: VAC: POST
26	LIQAT ALI S/O TAJ MUHAMMAD	R/O KHABAL PAEEN	MSQ: KHATTER	AGA: VAC: POST
27	HAZIR MUHAMMAD S/O AZIZ MUHAMMAD	R/O MANGLOOR	MSQ: LASSA	AGA: VAC: POST
28	INTIAZ HUSSAIN SHAH S/O AZAM SHAH	R/O MANGLOOR	GPS: BHANGIAN	AGA: VAC: POST
29	RASHID AHMAD S/O MUHAMMAD AYDUB	R/O SIMLIJALA	GPS: KHARYALA	AGA: VAC: POST
30	MUHAMMAD KHALID S/O ABDUL KHALIQ	R/O BAI BALA	GPS: SANJ	AGA: VAC: POST
31	MUHAMMAD BALEEM S/O MUHAMMAD ILYAS	R/O TANOL, BANDA	GPS: NANSHERA	AGA: VAC: POST
32	MUHAMMAD BALEEM S/O MUHAMMAD ILYAS	R/O BHANGI BALA	GPS: DHARYAL	AGA: VAC: POST
33	MUHAMMAD BALEEM S/O MUHAMMAD ILYAS	R/O BAHAL	GPS: PHALKOTE	AGA: VAC: POST
34	MUHAMMAD AHMAD S/O ALANCHIR	R/O PONDRA	GPS: KJONTAL	AGA: VAC: POST
35	FARIED KHAN S/O MISKEEN KHAN	R/O ARHASHQRI	MSQ: PHAGORA	AGA: VAC: POST
36	MURAD KHAN GHULAM NABI	R/O CHALUNKHIAN	MSQ: KHORIAN	AGA: VAC: POST
37	SAMIULLAH S/O MARAD KHAN	R/O RAFFA BHURD	GPS: NIKA PARI	AGA: VAC: POST
38	KHALID FARDOQ S/O ABDULLAH	R/O KOSHRAN	GPS: QAMIAN SERI	AGA: VAC: POST
39	MUHAMMAD YUNIS S/O MUHAMMAD AKBAR	R/O KARORI	GPS: CHAMRYAL	AGA: VAC: POST
40	S. ABIDUS SALAM S/O AULANAZER	R/O PINJRAH	GPS: UKER DAT	AGA: VAC: POST
41	LIQAT ALI S/O MUHAMMAD ARFAN	R/O GALT HADRAL	GPS: SHUNGLE	AGA: VAC: POST
42	ANWAR KHAN S/O MUHAMMAD MISKEEN	R/O GHANWOL	GPS: BAYAN	AGA: VAC: POST
43	SHAH NAWAZ S/O HAFEEZ ULLAH	R/O SHANAI BALA	GPS: BAKAN BELA	AGA: VAC: POST
44		R/O RAFFA	GPS: MANDA QUCHA	AGA: VAC: POST
45		R/O SHEROAN	GPS: CHINKOT	AGA: VAC: POST

ATTESTED

Attested
 [Signature]
 District Education Officer
 Lhalel Primary, Mansehra

CONTROL

Sl. No.	NAME, FATHER'S NAME	RESIDENCE	SCHOOL WHERE APPOINTED	REMARKS
46	HAG HAZI S/O AZIZ GUL	R/O BAHADUR	MSQ: HAJI QASIM	AGA: VAC: POST
47	JAVEEL AHAD S/O ABUL HASSAN	R/O CHINA	GPS BATTANGI (BATTI)	AGA: VAC: POST
48	JAMIL KHAN S/O HARAD KHAN	S/O BAHADUR	GPS BATTANGI (BATTI)	AGA: VAC: POST
49	USMATTAR S/O ABUL HASSAN	R/O BATTANGI	GPS BATTANGI	AGA: VAC: POST
50	ABDUL RAZI S/O ABUL HASSAN	R/O BATTANGI	GPS BATTANGI (BATTI)	AGA: VAC: POST
51	BEKHTIAR KHAN S/O QAZI AHMAD	R/O BAHADUR	GPS BATTANGI	AGA: VAC: POST
52	MUHAMMAD MUSLIM S/O ABUL HASSAN	R/O BAHADUR	GPS BATTANGI	AGA: VAC: POST
53	HAFIZ S/O S/O HASSAN	R/O BAHADUR	GPS BATTANGI	AGA: VAC: POST
54	SAJID KHAN S/O ABUL HASSAN	R/O BAHADUR	GPS BATTANGI	AGA: VAC: POST
55	ABDUL HAKIM S/O ABUL HASSAN	R/O BAHADUR	GPS BATTANGI	AGA: VAC: POST
56	MUHAMMAD KHAN S/O ABUL HASSAN	R/O BAHADUR	GPS BATTANGI	AGA: VAC: POST
57	MUHAMMAD KHAN S/O ABUL HASSAN	R/O BAHADUR	GPS BATTANGI	AGA: VAC: POST
58	MUHAMMAD KHAN S/O ABUL HASSAN	R/O BAHADUR	GPS BATTANGI	AGA: VAC: POST

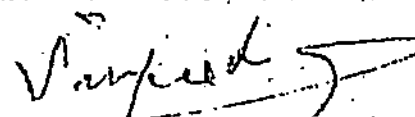
TERMS & CONDITIONS

1. They should submit their charge report to all concerned.
2. Their appointment is purely ^{or} temporary basis and can be terminated at any time without assigning any reason.
3. Their appointment is subject to the verification of their ^{original} Professional and academic certificates/documents.
4. Their original Professional and academic certificates should be checked thoroughly before handing over the charge and should not be handed over charge if the original certificates are not found correct.
5. No one should be handed over charge if he is below 18 years and above 25 years.
6. Their pay will not be drawn till they produce their age and health certificate by the medical Superintendent District Head Quarter Hospital Mansehra.
7. The Candidates who obtained their professional Qualifications from the colleges/Universities other than Govt. Elementary Colleges in NWFP will be appointed according to their merit order after the verification of their professional qualification from the concerned issuing Agencies.
8. They will be Governed under prescribed services rules framed by the Government of NWFP.

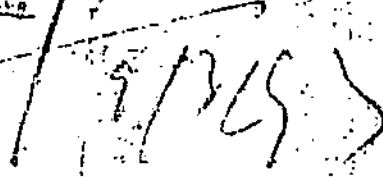
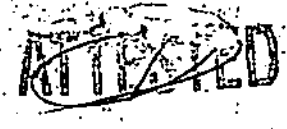

 (HAFIZ HUSSAIN)
 DISTRICT EDUCATION OFFICER
 MALI PRIMARY MANSEHRA

1601-61/GH/G.1/93 Dated Mansehra the 27/2/1993

- Copy of the above is forwarded to the:
- 1-2. Sub-Divisional Education Officer (Mal) Primary Mansehra.
 1. District Accounts Officer Mansehra.
 - 1-21. All the candidates concerned.


 DISTRICT EDUCATION OFFICER
 MALI PRIMARY MANSEHRA


 DISTRICT EDUCATION OFFICER
 MALI PRIMARY MANSEHRA

~~ATTESTED~~

DEPUTY SECRETARY POLICE
(WAJDAH LATIF)

[Signature]

ATTESTED



- 1. Additional Chief Secretary, Govt. of Khyber Pakhtunkhwa, Planning & Development Department, Khyber Pakhtunkhwa.
- 2. The Senior Member Board of Revenue, Khyber Pakhtunkhwa.
- 3. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
- 4. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
- 5. The Principal Secretary to Government in Khyber Pakhtunkhwa.
- 6. All Divisional Commissioners in Khyber Pakhtunkhwa.
- 7. All Heads of Attached Departments in Khyber Pakhtunkhwa.
- 8. All Autonomous/Semi Autonomous Bodies in Khyber Pakhtunkhwa.
- 9. All Deputy Commissioners in Khyber Pakhtunkhwa.
- 10. The Registrar, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
- 11. The Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
- 12. The Secretary, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
- 13. The Director (IT), E&A Department, Administration Department, Khyber Pakhtunkhwa.
- 14. All Deputy Officers in Establishment & Administration Department with the request to arrange 20 gazette copies.
- 15. The Section Officer (Admin), Administration Department, Khyber Pakhtunkhwa.
- 16. The Section Officer (Admin), Administration Department, Khyber Pakhtunkhwa.
- 17. The Director, Administration Department, Khyber Pakhtunkhwa.

CHIEF SECRETARY
GOVERNMENT OF THE KHYBER PAKHTUNKHWA

AMENDMENT

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

Amendment

Substituting further amendment shall be made, namely:

The Chief Minister of Khyber Pakhtunkhwa (Appointment, Termination and Transfer) Rules, 1989, the Government of Khyber Pakhtunkhwa Act No. XVIII of 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973) in exercise of the powers conferred by section 25 of the Constitution of Khyber Pakhtunkhwa, 1972.

NOTIFICATION

GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(REGISTRATION-WING)

Annexure - B -

15

**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 of 8) 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

ATTEMPTED

WFO447-2023 AZIZULHAQ VS GOVT OF POK

Section Officer (Policy)

(Also Deputy Section Officer (Policy))

Yours faithfully,

- 1. PG to Special Secretary (Rec); Establishment Department.
- 2. PG to Additional Secretary (Rec-II), Establishment Department.
- 3. PG to Deputy Secretary (Policy), Establishment Department.

Copy forwarded to the

7/6
ASSE

2011, please

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.

The basic rationale behind the said rule is aimed at preventing a provision exists to decide or forgo promotion. The basic rationale behind the said rule is aimed at preventing a provision exists to decide or forgo promotion. The basic rationale behind the said rule is aimed at preventing a provision exists to decide or forgo promotion.

Appointments dated 18.04.2023 in the subject noted above and to state that Sub-Rule (3) of Rule-7 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 stands deleted who the department notification dated 08.08.2020 that, do

CHIEF SECRETARY, GOVT. OF PAKISTAN
ESTABLISHMENT DEPARTMENT
ISLAMABAD

The Government of Khyber Pakhtunkhwa



GOVERNMENT OF KHYBER PAKHTUNKHWA
 ESTABLISHMENT DEPARTMENT
 No. SO (Policy) (EAD) 1-2020
 Dated: Islamabad, the 14th June 2023

6.2

Annexure - C

17



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
CIVIL SECRETARIAT PESHAWAR
(Phone No. 091-9227587)

No. SO (Primary-M)E&SED/2-6/2023
Dated Peshawar, the June 26th, 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 here with 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 mark]

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

Copy forwarded to the:

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

[Handwritten mark]

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

ATTESTED

18
B/c
No SO (Primary-M)/E&SED/2-6/2023
Dated Peshawar the Junp 25th 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(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 Tetter 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 (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, E&SE Department Khyber Pakhtunkhwa.

SECTION OFFICER (PRIMARY MALE)

ATTESTED

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).

Annexure
J


A meeting regarding the subject matter was held on 06-07-2023 at 11:00 AM under the Chairmanship of Additional Secretary Establishment in his office. The following attended the meeting.


Sl#	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. Rafiqul Ullah	General Secretary APTA Peshawar
4	Muhammad Ishaq	Section Officer (Primary) E&SE Department Civil Secretariat Khyber Pakhtunkhwa Peshawar

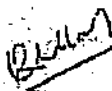
2. The meeting started with recitation from The Holy Quran. The chair welcomed the participants. The Deputy Director (Establishment) of Directorate of Elementary & Secondary Education briefed the forum regarding agenda item in detail.


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-I
E&SE Department


(Mr. Aziz Ullah)
Provincial President
All Primary Teachers Association
Khyber Pakhtunkhwa


(Mr. Rafiqul Ullah)
General Secretary APTA
Peshawar


(Muhammad Ishaq)
Section Officer (Primary-Male)
E&SE Department

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


ATTESTED

- B/C -

MINUTES OF THE MEETING REGARDING APPLICATION SUBMITTED BY MR. AZIZ ULLAH PROVINCIAL PRESIDENT ALL PRIMARY TEACHERS ASSOCIATION KHYBER PAKHTUNKHWA REGARDING DELETION OF RULE 7(5) IN THE CIVIL SERVANT (APPOINTMENT, PROMOTION & TRANSFER RULES 1989).

A meeting regarding the subject matter was held on 06-07-2023 at 11:00 AM under the Chairmanship of Additional Secretary Establishment in his office. The following attended the meeting

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

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

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

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

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

Provincial President
All Primary Teachers Association
Khyber Pakhtunkhwa

(Mr. Razaqat Ullah)
General Secretary APTA
Peshawar

(Muhammad Ishaq)
Section Officer (Primary-Male)
E&SE Department

(Abdullah)

Additional Secretary (Establishment)

APPROVED

~~ATTACHED~~

WP1442-2023 AZZULAM VS GOVT CP P043

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

17/01/2023
Assistant Director (Establish-1)
Ministry of Secondary Education
Khyber Pakhtunkhwa

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

Copy of the above is as:

This case is submitted for perusal and necessary actions please.

Departmental Promotion Committee.
provided they, their written refusal refer to condition of the meeting of
Teachers below. PS-16 may be exempted of the amendment in the rules bid
7(5) have offered a huge number of Female Teachers. Thus it is proposed that
In view of the above, this office is of considered opinion that his decision of Rules
has been asked for submission of consolidated case.
Chairman, Ministry of Secondary Education Establishment of his office. His
Time, in the light of the minutes of meeting held 6-07-2022 held under the
(Primary-14) E&SED/2/Appointment/2022 dated 12-06-2022.
The same was received 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 of forgo promotion. It is obligatorily upon every
Wing) vide letter No.50 (Policy) E&A/D/1-1/2020 dated 6-06-2022 categorically stated
That the Government of Khyber Pakhtunkhwa Establishment Department (Regulation
No.50 (Primary-14) E&SED/2/Appointment/2022 for necessary guidance.
The same was forwarded to the same to the quarter concerned vide letter
No.50 (Primary-14) E&SED/2/Appointment/2022 for necessary guidance.
promotion.
(ii) It is the prerogative of the civil servant to either accept or turn down the offer of
No.6987 dated 06-02-2023.
That this office sought guidance from your good office in the following words vide letter
dated 06-08-2022.
vide letter No. SOR-WI (E&A/D/1-1/2020 dated 06-08-2022.
That Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing)
dated Rule 7(5) in the Civil Servant (Appointment, Promotion & Transfer Rules 1989)
G.M/Ministry of the following/572023 dated 19-07-2023 on the subject cited above and to
I am directed to refer to the letter No.50 Primary-14 E&SED/1-1/2023
present brief history about the background of the case as under:

Subject - MINUTES OF THE MEETING

The Director (Primary-14),
Ministry of Secondary Education Department,
Khyber Pakhtunkhwa

Dear Sir,



No. 8145

Finance No. 9222/2023

Email: estab@kpk.gov.pk

Khyber Pakhtunkhwa, Peshawar

[Handwritten signature]

Head of Department
Elementary & Secondary Education
Kuala Lumpur

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

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.

The case is submitted for perusal and necessary action please.

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

That the government of KP-ED (Requesting Wg) vide letter No. SO (Policy) E&ED/1-3/2020 dated 6-06-2023 accordingly stated that there exists no provision to decline / forgo promotion. It is obligatory upon every civil servant to accept promotion under every condition.

That your good office forwarded the same to quarters concerned vide letter No. SO (Promotion) E&ED/2-2/Appointment/2023 for necessary guidance.

That the office sought guidance from your good office in the following words vide letter No. 6983 dated 06-07-2023 (1) Now it is obligatory upon civil servant to accept promotion. (2) It is prerogative of civil servant to either accept/turn down the offer of promotion.

That Government of KP Establishment department (Requesting Wg) decided rule 7(S) in Civil Servants (Appointment, Promotion, Transfer Rule 1997) vide notification No. No. SDR-VI (E&ED) 1-3/2020 dated 06-08-2020. The Government of KP has already background of case as under:

I am directed to refer to letter No. (SO. Promog-M) E&ED/5-1/G/04/1/2023 dated 30-7-2023 on subject cited above and to Minutes of meeting 13/7/2023

Section Officer (Primary-Male)
Elementary & Secondary Education Department
KPK, Peshawar.
Subject: Minutes of Meeting
Dear Sir, I am directed to refer to letter No. (SO. Promog-M) E&ED/5-1/G/04/1/2023 dated 30-7-2023 on subject cited above and to Minutes of meeting 13/7/2023

TESTED

WP4443-2023 AZIZULHAQ VS GOVT OF PAKISTAN

Scanned with CamScanner

SECTION OFFICER (PRIMARY MALE)

1. Director ESSE Khyber Pakhtunkhwa,
2. PS to Secretary, ESSE Department Khyber Pakhtunkhwa,

Copy forwarded to the:

SECTION OFFICER (PRIMARY MALE)

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

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

I am directed to refer to your letter No. SO(Policy)/ESAD/1-3/2020 dated 08 June 2023 and to state that after deletion of rule 7(5) Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion & Transfer Rules 1989) it has been indicated that those officers/officials who do not comply with promotion order of the competent authority or DT to evade promotion through different means shall be proceed under Khyber Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules, 2011.

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

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

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

ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
CIVIL SECRETARIAT PESHAWAR
(Phone No.091-9223577)



Annexure E

- B/c -

- 2 -

No. So (Primary - M) E&SE/2-A/
Appointment - Rule/2023Peshawar Dated 23rd August, 2023.

To

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

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

Dear Sir,

I am directed to refer to your letter No. So (Primary) (Policy) /E&AD
/1-3/2020 dated 8th June 2022 and to state that after
deletion of Rule 7(S) (Khyber Pakhtunkhwa Civil Servant (Appointment,
Promotion and 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 and Discipline) Rule 2011.

In this connection it is submitted that in some cases lady
teacher of primary level who avail such promotion have to
face serious inconvenience while they have to perform duties
in the remotest stations with no residential/transport facilities.
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.
In view of above, the said amendment may be reconsidered to
the extent of lady teacher in primary schools.

Copy forwarded to;

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

(Muhammad Ishaq)
Section Officer (Primary
Male)

NOTED

Annexure - F



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

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

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

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

FILED
SEP 11 2023
PESHAWAR

VP-442-2023 AZIZULLAH VS GOVT OF PK

26

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)

Endst. 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)

ATTESTED

To,

Dated: 28-01-2024

- 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

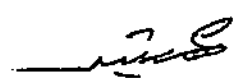
REPRESENTATION AGAINST THE IMPUGNED NOTIFICATION BEARING NO.SO(POLICY)E&AD/1-312020, DATED 06/08/2020, COMMUNICATED TO SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA, ELEMENTARY & SECONDARY EDUCATION DEPARTMENT VIDE LETTER D06/06/2023. WHEREIN IT WAS STATED THAT SUB RULE 5 OF RULE 7 OF KHYBER PAKHTUNKHWA 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.

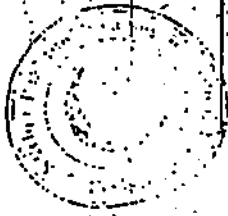
It is, therefore, humbly prayed that on the acceptance of the instant representation; the Notification bearing No. SO (POLICY) E&D/1-3 1-2020 DATED 06/08/2020, communicated to vide letter dated 06/06/2023, may please be declared and ordered to be struck down being Void, Ultra vires to the Constitution of Pakistan.

Best Regards


Muhammad Khalid Son of Abdul Khaliq
Resident of Tehsil & District Manshera

ATTESTED

07.05.2024

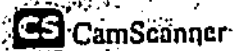


1. Learned counsel for the appellant present.
2. Let a pre-admission notice be issued to the respondents through TCS for submission of reply/comments. Appellant is directed to deposit TCS expenses within three days. To come up for reply/comments as well as preliminary hearing on 10.06.2023 before S.B. 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]
13/5/23

Date of Presentation of Application 13-5-23
 Number of 57
 Copies 57
 Urgent 57
 Total 57
 Name of 13-5-23
 Date of 13-5-23
 Date of Delivery of Copy 13-5-23



~~ARRESTED~~

VAKALAT NAMA

BEFORE THE SERVICE TRIBUNAL PESHAWAR

MUHAMMAD KHALID ~~Respondent~~
Versus

Government of KP & others

Respondents

I (the Appellant)

do hereby appoint and retain

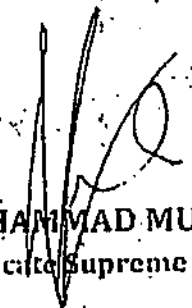
MUHAMMAD MUAZZAM BUTT ASC. MUHAMMAD ADEEL BUTT AHC
BASSAM AHMAD SIDDIQUI AHC
&
ASSOCIATES OF MUAZZAM LAW FIRM

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