


# FORM OF ORDER SHEET

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

Appeal No. 2226 /2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	30/10/2024	<p>The appeal presented today by Mr. Muhammad Muazzam Butt Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 06.11.2024. 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**

G.M No \_\_\_\_\_ P of 2024 \_\_\_\_\_

In Ref to

Service Appeal No 2226 2024


Khad Mir Khan

**VERSUS**

Secretary to Government of Khyber Pakhtunkhwa, & others

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ADVOCATE

M. Muazzam Butt

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA**

In Ref to

Service Appeal No. 2226 /2024

Khad Mir Khan Son of Awal Mir Khan, PSHT  
GPS Garhi Amir Khan, Tehsil & District Peshawar

.....Appellant

**VERSUS**

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

.....Respondents

**SERVICE APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT 1974. AGAINST THE IMPUGNED NOTIFICATION BEARING NO.SO(POLICY)E&AD/1-3/2020, 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/1-3/2020, 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 Appointment letter 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) /E&AD/1- 3/2020 dated 06/08/2020, the right of foregoing of promotion was withdrawn and the Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) deleted Rule 7(5) in the Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 vide notification no SOR-VI (E & AD)/1-2/2020 dated 06-08-2020. Copy of Impugned 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 E
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 affects 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 /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/1-3/2020 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.

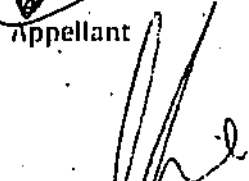
Any other relief, which this honorable Tribunal deems fit and proper in the circumstances of the case, may also be granted to the appellant.

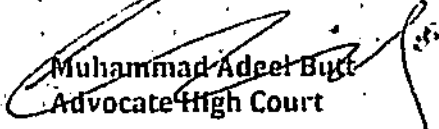
**AFFIDAVIT:**  
 I, (the appellant) solemnly declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

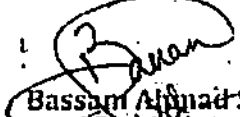
  
 Deponent

  
 Appellant

Through

  
 Muhammad Muazzam Butt  
 Advocate Supreme Court

  
 Muhammad Adeel 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

Khad Mir Khan

**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.**

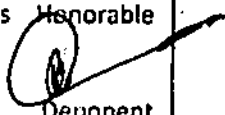
Respectfully Submitted:-

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.

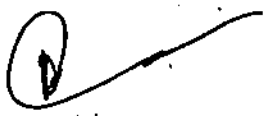
In view of the reasons, it is humbly requested that the notification bearing No. So (Policy) E&D/1-3/2020 dated 06/08/2020, communicated to Respondent No.2 by Respondent No.1, Vide Letter Dated 06/06/2023 may kindly be suspended till the final disposal of the main appeal in hand.


**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

Through

  
Appellant

  
Muhammad Muazzam Butt  
Advocate Supreme Court

  
Muhammad Adeel Butt  
Advocate High Court

-6-

**Dist: Govt. KP-Provincial**  
**District Accounts Office Peshawar Dist.**  
**Monthly Salary Statement (January-2024)**



Personal Information of Mr KHADMIR KHAN d/w/s of AWAL MEER KHAN

Personnel Number: 00020975      CNIC: 1730115152763      NTN: 0  
Date of Birth: 02.03.1966      Entry into Govt. Service: 14.03.1985      Length of Service: 38 Years 10 Months 019 Days

Employment Category: Active Temporary

Designation: PRIMARY SCHOOL HEAD TEACH      80675740-DISTRICT GOVERNMENT KHYBE

DDO Code: PW6571-District Peshawar

Payroll Section: 003

GPF Section: 001

Cash Center: 31

GPF A/C No: EDU 030558

GPF Interest applied

GPF Balance:

590,462.00 (provisional)

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil

BPS: 15

Pay Stage: 26

Wage type		Amount	Wage type		Amount
0001	Basic Pay	75,400.00	1004	House Rent Allow 45% KP21	8,741.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1505	Charge Allowance	40.00	2148	15% Adhoc Relief All-2013	1,020.00
2199	Adhoc Relief Allow @10%	682.00	2316	Teaching Allowance 2021	3,224.00
2341	Dispr. Red All 15% 2022KP	7,206.00	2347	Adhoc Rel AI 15% 22(PS17)	7,206.00
2378	Adhoc Relief All 2023 35%	25,697.00			0.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3015	GPF Subscription	-4,290.00	3501	Benevolent Fund	-1,200.00
3534	R. Ben & Death Comp Fresh	-600.00	3609	Income Tax	-4,085.00
3990	Emp. Edu. Fund KPK	-135.00			0.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance
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**Deductions - Income Tax**

Payable: 64,120.38      Recovered till JAN-2024: 27,668.00      Exempted: 16029.58      Recoverable: 20,422.80

Gross Pay (Rs.): 133,572.00      Deductions: (Rs.): -10,310.00      Net Pay: (Rs.): 123,262.00

Payee Name: KHADMIR KHAN

Account Number: 4063851916

Bank Details: NATIONAL BANK OF PAKISTAN, 231499 OFFICER COLONEY OFFICER COLONEY,

Leaves:      Opening Balance:      Availed:      Earned:      Balance:

Permanent Address: PESHAWAR

City: Peshawar

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: khadmirpsht@gmail.com

System generated document in accordance with APPM 4.6.12.9(87333/25.01.2024/v3.0)

\* All amounts are in Pak Rupees

\* Errors & omissions excepted (SERVICES/07 2024/10-13-07)



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DISTRICT EDUCATION OFFICER (M.A.)  
PESHAWAR

Handwritten signature/initials

- 1 Chair Man Distt; Council, Peshawar.
- 2 Candidate concerned.
- 3 SDO(M) Peshawar.

Subject: No. 7710-11 dated Peshawar the 27/2/1985  
 Referred for information to the:-

DISTRICT EDUCATION OFFICER (M.A.)  
 PESHAWAR

The day scale and service of the candidate would be subject to revision in accordance with clause 1 of the rules passed by the Govt. of West Bengal, from time to time.

He should execute necessary security bond in case he is required to vacate Govt. money or property.

29. The candidate should not be handed over charge if his age exceeds 25 years or exceeds 16 years.

30. The candidate should not be handed over charge if his age exceeds 25 years or exceeds 16 years.

31. The candidate should not be handed over charge if his age exceeds 25 years or exceeds 16 years.

32. The candidate should not be handed over charge if his age exceeds 25 years or exceeds 16 years.

33. The candidate should not be handed over charge if his age exceeds 25 years or exceeds 16 years.

34. The candidate should not be handed over charge if his age exceeds 25 years or exceeds 16 years.

35. The candidate should not be handed over charge if his age exceeds 25 years or exceeds 16 years.

36. The candidate should not be handed over charge if his age exceeds 25 years or exceeds 16 years.

37. The candidate should not be handed over charge if his age exceeds 25 years or exceeds 16 years.

38. The candidate should not be handed over charge if his age exceeds 25 years or exceeds 16 years.

39. The candidate should not be handed over charge if his age exceeds 25 years or exceeds 16 years.

40. The candidate should not be handed over charge if his age exceeds 25 years or exceeds 16 years.

Candidate by name appointed by U/T P.T.O. on 01/01/1985 in the post of SDO (M) Peshawar. The date of his appointment is 01/01/1985. The date of his appointment is 01/01/1985. The date of his appointment is 01/01/1985.

At Peshawar this 27th day of February 1985.

Mr. Khod Mir Khan  
 District Education Officer (M.A.)  
 Peshawar

Handwritten signature/initials

4-11-54-d  
DEPUTY SECRETARY (POLICY)  
QWALDAH LATTI

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 Governor, Khyber Pakhtunkhwa.
- 5. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
- 6. The Principal Secretary to Chief Ministers, Khyber Pakhtunkhwa.
- 7. All Divisional Commissioners in Khyber Pakhtunkhwa.
- 8. All Heads of Attached Departments in Khyber Pakhtunkhwa.
- 9. All Autonomous/Semi Autonomous Bodies in Khyber Pakhtunkhwa.
- 10. All Deputy Commissioners in Khyber Pakhtunkhwa.
- 11. The Registrar, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
- 12. The Secretary, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
- 13. The Deputy Director (IT), E&A Department, Administration Department, Khyber Pakhtunkhwa.
- 14. The Section Officer (Admn), Administration Department, Khyber Pakhtunkhwa.
- 15. The Section Officer (Admn), Administration Department, Khyber Pakhtunkhwa.
- 16. The Section Officer (Admn), Administration Department, Khyber Pakhtunkhwa.
- 17. The Section Officer (Admn), Administration Department, Khyber Pakhtunkhwa.
- 18. The Section Officer (Admn), Administration Department, Khyber Pakhtunkhwa.
- 19. The Section Officer (Admn), Administration Department, Khyber Pakhtunkhwa.
- 20. The Section Officer (Admn), Administration Department, Khyber Pakhtunkhwa.

CHIEF SECRETARY  
GOVERNMENT OF THE IGHTEN-PAKHTUNKHWA

EXISTED NO & EVEN DATE

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

AMENDMENT

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, 1959, the following further amendment shall be made, namely:

NOTIFICATION

Dated Peshawar, the 06/8/2020

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(REGULATION-WING)

Annexure - 8 -  
- 8 -

-9-

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(REGULATION WING)

NOTIFICATION

Dated Peshawar the, 06/08/2020

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

AMENDMENT

In rule 7, sub-rule (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)



*[Handwritten signature]*

W74447-2023 AZIZULHAQ VS GOVT OF PAK

Section Officer (Policy)

Section Officer (Policy)

Yours faithfully,

- 1. PG to Special Secretary (Legal, Legislative Department)
- 2. PA to Additional Secretary (Legal, Legislative Department)
- 3. PS to Deputy Secretary (Policy), Legislative Department

Copy forwarded to the:

*[Handwritten initials]*

2011, please

proceeded against under Khyber Pakhtunkhwa Civil Servants (Immunity & Discipline) Rules;

of the competent authority or try to evade punishment through different means shall be

Further, those officers/officials who do not comply with promotion order

will serve to accept promotion in every condition.

to locate higher, responsibility in case of promotion. Therefore, it is obligatory upon every

prevent those who tend to forge promotion to evade punishment or show lack of capacity

will serve from temptation for little gain by seeking to a single liberative position or to

The basic rationale behind the deletion of the said rule is aimed at preventing a

2. provision exists to decide or forge promotion.

Appointments dated 18.04.2023 in the subject noted above and to state that Sub-Rule (5) of Rule-7 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 stands deleted vide this departmental notification dated 06.08.2020; thus, no

I am directed to refer to your letter No. SO(Pol/Imm-Adm/2017-22

Section Officer (Policy)

Subject: **QUANTAS REGARDING DELETION OF RULE 2(a) IN THE KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION AND TRANSFER) RULES, 1989**

To: The Government of Khyber Pakhtunkhwa, Islamabad & Secondary Education Department.

GOVERNMENT OF KHYBER PAKHTUNKHWA  
 FEDERAL SECRETARIAT, ISLAMABAD  
 No. SO(Pol/Imm-Adm)/2020  
 Dated: Islamabad the June 06, 2022



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Annexure - C

-10-

11-

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT**  
**CIVIL SECRETARIAT PESHAWAR**  
(Phone No.091-9223587)

No. SO (Primary-M/E&SED/2-6/2023  
Dated Peshawar the June 25<sup>th</sup>, 2023

To

The Director  
Elementary & Secondary Education Department  
Khyber Pakhtunkhwa, Peshawar.

Aziz Ullah Khan  
President  
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 letter No. 50 (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 JSHAO)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

  
SECTION OFFICER (PRIMARY MALE)  
25/6/23

-12-  
B/c

No SO (Primary-M)/E&SED/2-6/2023  
Dated Peshawar the June 25<sup>th</sup> 2023

To  
The Director  
Elementary & Secondary Education Department  
Khyber Pakhtunkhwa, Peshawar

Aziz Ullah Khan President  
President  
All Primary Teacher's Association, KP

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



-13-

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).

Annexure  
①


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#	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. Razaqal 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 three hours 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. Razaqal Ullah)  
General Secretary APTA  
Peshawar

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

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



-14-

-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)



*[Handwritten signature]*

WP442-2023 AZIZULAH VS GOVT OF PAK

Assistant Director (Ex-1041-1)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

2. Master Copy  
PA: Director, Local Directorate

Copy of the above is in:

Assistant Director (Ex-1041-1)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

*[Handwritten signature]*  
21/7/2023

The case is submitted for perusal and necessary actions please.

Departmental Investigation Committee.  
Teachers have objected to the proposed that they might their written refusal prior to conduct of the meeting of (75) have objected to the proposed that they might their written refusal prior to conduct of the meeting of  
In view of the above, this office is of considered opinion that the decision of Rules been asked for submission of consolidated case.  
Chairman of the Hon. National Secretary Establishment of his office this office has  
That, in the light of the minutes of meeting dated 6-07-2023 held under the (Primary-4) E&SED/2-7/Appointment/2023 dated 12-05-2023.  
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 exists no provision in decline or forgo promotion. It is obligatory upon every (Wing) vide letter No.50 (Policy) E&AD/1-1/2020 dated 6-06-2023 categorically stand that the Government of Khyber Pakhtunkhwa Establishment Department, (Regulation No.50 (Primary-4) E&SED/2-7/Appointment/2023 for necessary guidance.  
That your good office forwarded the same to the quarter concerned vide letter promotion.  
(ii) It is the prerogative of the civil servant to either accept or turn down the offer of (ii) Now it is obligatory upon the civil servant to accept promotion in every condition. No.6987 dated 06-02-2023.  
That this office would in guidance from your good office in the following words vide letter wide notification No. SOR-VI (E&AD)/1-1/2020 dated 06-08-2020.  
That Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) dated Rule 75) in the Civil Servants (Appointment, promotion & Transfer Rules 1989) that you may refer to the quarter concerned for necessary guidance.

I am directed to refer to the letter No.50 (Primary-4) E&SED/2-7/Appointment/2023 dated 12-05-2023 on the subject cited above and in present brief history about the background of the case as under.

The Section Officer (Primary-4),  
Elementary & Secondary Education Department,  
Khyber Pakhtunkhwa Fertilizer,  
Dear Sir,  
Subject - MINUTES OF THE MEETING

No. 8145  
Khyber Pakhtunkhwa, Peshawar  
Phone: 01-9225344  
E-mail: establishmentinfo@govpk.com  
Date: 21-7-2023



*[Handwritten signature]*

WP4447-2023 AZIZULAM VS GOVT OF PC43

Asst. Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

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

In view of the above, this office is of considered opinion that the decision 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 no provision to clerical / para promotion. It is obligatory upon every civil servant to accept promotion under every condition. That the government of KP-ED (Regulation wing) vide letter No. SO (Policy) EQ/ED/1-3/2020 dated 6-06-2023 accordingly stated that there exists no provision to clerical / para 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 (Policy) EQ/ED/2-2/Appointment/2023 for necessary guidance. That the government of KP-ED (Regulation wing) vide letter No. SO (Policy) EQ/ED/1-3/2020 dated 6-06-2023 accordingly stated that there exists no provision to clerical / para promotion. It is obligatory upon every civil servant to accept promotion under every condition. (iii) It is prerogative of civil servant to either accept/demand the offer of promotion. (ii) Now it is obligatory upon civil servant to accept promotion. That this office sought guidance from your good office in the following vide notification No. No. SOP-VI (EQ/ED) 1-3/2020 dated 06-08-2020. That Government of KP Establishment department (Regulation wing) dated rule 7(S) in Civil Servants (Appointment, Promotion, Transfer etc 1999) vide notification No. No. SOP-VI (EQ/ED) 1-3/2020 dated 06-08-2020. That this office sought guidance from your good office in the following words vide letter No. EQ/ED/1-3/2020 dated 06-08-2020. (iii) Now it is obligatory upon civil servant to accept promotion. That your good office forwarded the same to quarters concerned vide letter No. SO (Policy) EQ/ED/2-2/Appointment/2023 for necessary guidance.

Dear Sir, I am directed to refer to letter No. (SO: Policy-III) EQ/ED/1-3/2020/ dated 10-7-2023 on subject cited above and to present brief history about background of case as under. That Government of KP Establishment department (Regulation wing) dated rule 7(S) in Civil Servants (Appointment, Promotion, Transfer etc 1999) vide notification No. No. SOP-VI (EQ/ED) 1-3/2020 dated 06-08-2020. That this office sought guidance from your good office in the following words vide letter No. EQ/ED/1-3/2020 dated 06-08-2020. (iii) Now it is obligatory upon civil servant to accept promotion. That your good office forwarded the same to quarters concerned vide letter No. SO (Policy) EQ/ED/2-2/Appointment/2023 for necessary guidance.

Section Officer (Policy-Male)  
KPK, Peshawar

Directorate of Elementary & Secondary Education Department

Subject: Minutes of Meeting

To: Section Officer (Policy-Male), KPK, Peshawar

Directorate of Elementary & Secondary Education, KPK



ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
CIVIL SECRETARIAT PESHAWAR  
(Phone No.091-8223587)

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 05<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.

(MUHAMMAD ISHAC)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

(MUHAMMAD ISHAC)  
SECTION OFFICER (PRIMARY MALE)  
28/8/23

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

Section Officer (Primary  
Schools)  
(Muhammad Ishtiaq)

Copy forwarded to:

1. Director, E & SE Khyber Pakhtunkhwa

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.

9 am directed to refer to your letter No. SO (Primary) (E&AD) /1-3/2020 dated 8th June 2020 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.

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

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

No. 5 (Primary-M) E&SE/PA-1/  
Appointment-Rule/2023  
Peshawar Dated 22nd August, 2023.

-B/c-

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)

Encl. Of even No & Date

Copy forwarded to the:-

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

-20-

- B/C -

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
No. SO(Polcy)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 (Polcy)

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 (Polcy), Establishment Department

Section Officer (Polcy)

-21-

Annexure - G

To,

- 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

**Subject: 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. SO (Policy) /E&AD/1-3/2020 dated 06/08/2020, the right of foregoing of promotion was withdrawn and the Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) deleted Rule 7(5) in the 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 and against the fundamental principles of natural justice.

Dated 16/03/2024



  
KHAD MIR KHAN  
S/O AWAL MIR KHAN  
PSHT

Talib-e-Pakistan Khwa

Aziz Ullah Khan  
President  
C 0333-0215648  
azizullah1073@gmail.com  
01 nainab



APTA House  
Govt Primary School No.4  
Gulbhar Peshawar City.

آل پرائمری ٹیچرز ایسوسی ایشن (اپتا) خیبر پختونخوا

Annexure - H

مہذب: نیکو روی و ملنسری و یکساں رویی اور یکساں خیبر پختونخوا  
مہذب: آل پرائمری ٹیچرز ایسوسی ایشن خیبر پختونخوا  
بیت مال

گزارش ہے کہ پروسٹروٹور ایجنسی سے ملے ہیں کہ سرکاری ملازم کی فراہمی ملتا ہے پروسٹروٹور ایک سالوں اور اگر تاحق کہ جو ملازم ایک اگر کسی  
بجورگے تحت ایک دن پروسٹروٹور میں دو ماہر آتھا پھر سال تک پروسٹروٹور میں لے سکتے ہے مہذب پھر سال تک ہر اس کی پروسٹروٹور میں اسکا حق  
ہر اس سالوں میں کوئی رعایت ملیگا پھر سالوں میں ایک ماہ کی رقم کوئی کہ اگر ایک ملازم ایک سال پروسٹروٹور میں لے لیں تو دوسرے سال لے سکتا ہے  
لیکن اب ایک ماہ پہلے ایک اور ڈیٹیکشن ہوا ہے

ہمیں کے مطابق اب ہر ملازم پروسٹروٹور میں لے کے اگر نہیں لیں گے تو اس کے خلاف ای سی ڈی اور ڈی کے مطابق کارروائی کر لے گا کیا ہے  
وہ اس پر آئی ڈیٹیکشن بیکال انسانی حقوق کی کمی خلاف روزی ہے سب سے کی دوسرا اور بہت سی ملازموں میں اس کے خلاف کارروائی کے انتہائی مشکلات کا  
سامنا کرنا ہے

بکہ عام حالات میں بھی لبرائن پروسٹروٹور اور دوسرا بھینا کی بیکال انسانی حقوق کی خلاف ورزی ہے کہ کہ خیبر پختونخوا میں پوسٹل سے لگاؤ اور شہریوں  
کیا ہوتا ہے ایسے حالات میں یہ لبرائن ڈیٹیکشن جی آر ایس ای کی کاغذوں پر لبر کی جھجک میں کیا گیا ہے جو پوسٹل اور بیکال انسانی حقوق کی خلاف ورزی  
ہمیں کے خلاف کارروائی ہونا چاہیے کہ اس کے خلاف کارروائی کی جھجک میں کیا گیا ہے

لہذا ہم آپ سے درخواست کرتے ہیں کہ ڈیٹیکشن کو روکیا جائے اور اس میں ترمیم کر کے پرائمری اساتذہ کو (Relaxation) دیا جائے اور اس کا  
لہذا پروسٹروٹور لینے کا جھجک اس کے خلاف سے لینے دیا جائے  
اور پروسٹروٹور لینے کی صورت میں اس کا ڈیٹیکشن لینے سے لبر و سٹائٹ کیا جائے  
اس سلسلے میں آپ جلد از جلد ہم (DRO) ای ای ایڈ کے ایک نمبر سے رابطہ ہونی چاہیے تاکہ اسکا حل ہمیں مل سکیں پرائمری اساتذہ کو ذاتی  
البتہ لبر پوسٹل سے لبرایا جائے

کہی ڈیٹیکشن ہونی اور اس کی پرائمری اساتذہ کو ذاتی طور پر لبر کر کے اس سلسلے شروع ہو چکا ہے  
لہذا ہم یہ توقع رکھتے ہیں کہ آپ سامان آئی ایجنسی لبر سب لبر کے پرائمری اساتذہ کو نمبر سے رابطہ پرائمری اساتذہ کو اس اہل ایجنسی سے بہت رہائی کے

شکر ہے

منزلتہ خان سرہانی صدر  
آل پرائمری ٹیچرز ایسوسی ایشن خیبر پختونخوا



# VAKALAT NAMA

## BEFORE THE SERVICE TRIBUNAL PESHAWAR

*KHAD MIR KHAN*

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*  
MUHAMMAD MUAZZAM BUTT  
Advocate Supreme Court

*Muhammad Adeel Butt*  
MUHAMMAD ADEEL BUTT  
Advocate High Court

*Bassam Ahmad Siddiqui*  
BASSAM AHMAD SIDDIQUI  
Advocate High Court