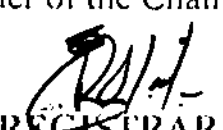


FORM OF ORDER SHEET

Court of _____

Appeal No: 2294 / 2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/11/2024	<p>The appeal presented today by Mr. Muhammad Muazzam Butt Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 12.11.2024. 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

C.M No _____-P of 2024

In Ref to

Service Appeal No 2294/2024

Jehan Zada

VERSUS

Secretary to Government of Khyber Pakhtunkhwa, & others

INDEX

S#	DESCRIPTION OF DOCUMENTS	ANNEX	PAGES
1.	Appeal and Verification	*	1-4
2.	Application for suspension	*	5
3.	Copy of Monthly Salary Account	A	6-6-e
4.	Copy of notification No. SD (Policy) EV AD/1-3/2020 dated 06/08/2020	B	7-8
5.	Copy of impugned letter dated June 6 th , 2023	C	9-11
6.	Copy of Minutes of meeting dated 06-07-2023	D	12-15
7.	Copy of Letter dated 23-08-2023	E	16-17
8.	Copy of Impugned letter dated 07.09-2023	F	18-19
9.	Copy of Representation against the said notification and representation made by APTA President	G & H	20-21
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ADVOCATE


M. Muazzam Butt

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA

In Ref to

Service Appeal No 2294 /2024

Jehan Zada son of Ghulam Rahim SPST (BPS-14)

Tangai, Shagolai, Tehsil Puran, District Shangala

.....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

P R A Y E R:

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 IUSTICE 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 Senior Primary School 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) /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 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 9 (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 forego 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 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.

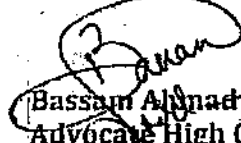

Deponent

Through


Appellant


Muhammad Muazzam Butt
Advocate Supreme Court


Muhammad Adeel Butt
Advocate High Court


Bassam Ahsan 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

Jehan Zada

V E R S U S

Secretary to Government of Khyber Pakhtunkhwa, & others

APPLICATION FOR SUSPENSION OF IMPUGNED NOTIFICATION BEARING NO. SO (POLICY) E&D/1-3/2020 DATED 06/08/2020, COMMUNICATED TO RESPONDENT NO.2 BY RESPONDENT NO.1, VIDE LETTER DATED 06/06/2023 TILL THE FINAL DISPOSAL OF CASE IN HAND.

Respectfully Submitted:-

1. That the instant application may be treated as part and parcel of service appeal of the appellant.
2. That the appellant has brought a good prima facie case and balance of convenience also lies in favor of the appellant.
3. That there is likelihood success of the appellant in the lis. And if the notification bearing No. So (Policy) E&D/1-3/2020 Dated 06/08/2020, communicated to Respondent No.2 by Respondent No.1, Vide Letter Dated 06/06/2023 is not suspended the appellant would suffer irreparable loss.
4. That valuable rights of the appellant is involved in the case.

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

AFFIDAVIT


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


Deponent


Appellant

Through


Muhammad Muazzam Butt
Advocate Supreme Court


Muhammad Adeel Butt
Advocate High Court

Dist. Govt. KP-Provincial
District Accounts Office Shangla
Monthly Salary Statement (September-2024)



6
Annexure A

Personal Information of Mr JEHAN ZADA d/w/s of GHULAM RAHIM

Personnel Number: 00206578

CNIC: 1550502063381

NTN:

Date of Birth: 20.02.1975

Entry into Govt. Service: 24.06.1997

Length of Service: 27 Years 03 Months 008 Days

Employment Category: Active Temporary

Designation: SENIOR PRIMARY SCHOOL TEA

80654297-DISTRICT GOVERNMENT KHYBE

DDO Code: SH6147-District Shangla

Payroll Section: 001

GPF Section: 001

Cash Center: 60

GPF A/C No: EDSW 015721

GPF Interest applied

GPF Balance:

1,103,233.00 (provisional)

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil

BPS: 14

Pay Stage: 22

Wage type		Amount	Wage type		Amount
0001	Basic Pay	60,810.00	1001	House Rent Allowance 45%	3,321.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1911	Compen Allow 20% (1-15)	1,000.00	2148	15% Adhoc Relief All-2013	796.00
2199	Adhoc Relief Allow @10%	535.00	2316	Teaching Allowance 2021	3,036.00
2341	Dispr. Red All 15% 2022KP	5,787.00	2347	Adhoc Ref Al 15% 22(PS17)	5,787.00
2378	Adhoc Relief All 2023 35%	20,674.00	2393	Adhoc Relief All 2024 25%	15,202.00

Deductions - General

Wage type		Amount	Wage type		Amount
3014	GPF Subscription	-3,900.00	3501	Benevolent Fund	-1,200.00
3609	Income Tax	-4,272.00	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: 68,347.73 Recovered till SEP-2024: 12,816.00 Exempted: 17086.61 Recoverable: 38,445.12

Gross Pay (Rs.): 121,304.00

Deductions: (Rs.): -10,107.00

Net Pay: (Rs.): 111,197.00

Payee Name: JEHAN ZADA

Account Number: 3076-3

Bank Details: MCB BANK LIMITED, 240968 MCB ALLOCH SHANGLA MCB ALLOCH SHANGLA, SHANGLA

Leaves:

Opening Balance:

Availed:

Earned:

Balance:

Permanent Address: PURAN DISTT SHANGLA.

City: SHANGLA

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: jehan206578@gmail.com

System generated document in accordance with APPM 4.6.12.9(580886/26.09.2024/v3.0)

* All amounts are in Pak Rupees

* Errors & omissions excepted (SERVICES/01.10.2024/20:47:25)

They will be governed by such rules & regulations as may be prescribed by the Govt. from time to time for the category of the Govt. servant which they belong.

Their services will be liable to termination on One month notice from either side. In case of resignation without notice, one month pay will be forfeited in lieu thereof.

They should join the post within one month of the issue of this notification.

Their inter-caste seniority will be determined in accordance with the merit of Departmental Selection Committee.

Charge report should be submitted to all concerned.

They shall be probation for a period of two years and will have to pass Departmental Examination. In case a candidate fails to qualify, the Departmental Exam. he will be given one more chance. If he fails again, then his services will be terminated. On availability of trained teacher the services of un-trained teacher occupying the post will be terminated.

Their original certificates/degrees should be checked and verified from the concerned University/U.P.S./K.D.B. and Islamic Madrasah concerned before handing over charge.

Service books of the teachers must be prepared complete in all respect before handing over charge.

The declaration of Assets should be obtained from them immediately and placed on record.

They are required to produce health & Age certificate from Medical authorities concerned before taking over charge.

Charge should not be given to the over age candidate. His case for age relaxation be sent to the concerned quarters.

Efforts for transfer before the completion of tenure will disqualify him from the service.

No. P.A/D. is allowed. An undertaking shall be obtained from student & Degree holder P.W.O, C.T. etc. that they will service the Department for at least 5-year unless he/they are selected by the public service commission for any post.

In case of person appointed as an untrained teacher, he will have to pass the requisite training examination within a period of 4 year, failing which his services will be terminated.

Complete information of each category (separately) in consolidated lists on the prescribed proforma (attached) along with charge report be submitted by the lower offices to the Director of Primary Education/ P.O. (P) Dera Ismail Khan within a week positively.

(SAID ALI BHAI)

District Education Officer (K) Primary

Dera Ismail Khan

Order No. 3097-3107

- Copy forwarded for information to the:-
- Director of Primary Education, Dera Ismail Khan.
- Secretary to Govt. of Punjab, Education Deptt. Lahore.
- Director of Primary Education, Lahore.
- District Accounts Officer (K) Dera Ismail Khan.
- Sub-Divisional Education Officer (K) Dera Ismail Khan and all other officials concerned.

CH/file

District Education Officer (K) Primary

16
 J. P. S. Mungai
 Date of Birth: 2-2-75
 Marks: 7/61
 Cont on 1/24
 Cont on 1/24
 Cont on 1/24

Sl. No.	Name	Grade	Age	Sex	Religion	Parent's Name	Address	Phone No.
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20

6-8

The following information has been provided to you for your information. It is subject to the terms and conditions of the school.



OFFICE OF THE 6-c
DISTRICT EDUCATION OFFICER



DUTY CERTIFICATE

It is certified that Mr./Miss. Jehani Nadeem SIDWIO (Puram) Rahim having

CNIC# 15505-020-6338-1 appointed vide Directorate E&SE Endtt: No. 3097-3167

date: 24-06-97 is working as SPST at GPS B. Tari Bunde

Department: E&SE Khyber Pakhtunkhwa since 08-03-2013 till date. I always found him/her sincere and devoted to his/her assigned task.

DISTRICT EDUCATION OFFICER

MALE/FEMALE _____

[Signature]
PRINCIPAL/HEADMASTER/MISS/STRESS/HEADTEACHER
SDEO (P) : Puran Shingla
25/10/2024

No. _____

Date: 25-10-2024

Copy forwarded to:

Annexure - B

GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(REGULATION WING)

NOTIFICATION

Dated Peshawar, the 06/8/2020

SUN Policy E.AAD/1-3/2020: In exercise of the powers conferred by section 24 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973) the Chief Minister of Khyber Pakhtunkhwa is pleased to direct that in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the following further amendment shall be made, namely:

AMENDMENT

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

CHIEF SECRETARY
GOVERNMENT OF THE KHYBER PAKHTUNKHWA

NOTE: NO & 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), B&A Department.
14. All Section Officers in Establishment & Administration Department with the request to arrange 20 gazette copies.
15. The Caretaker, Administration Department.

1267
06/08/2020

ATTESTED

(WAJDAH LATIF)
DEPUTY SECRETARY (POLICY)

Attested

4

B/C -8-

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-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)



[Handwritten signature]

21.6.23
2023-06-21

- 1. To Special Secretary (Reg), Establishment Department.
- 2. To Additional Secretary (Rec-1), Establishment Department.
- 3. To Deputy Secretary (Policy), Establishment Department.

Copy forwarded to the
Hon. Member & State

ASSE
21/6

Section Officer (Policy)

Section Officer (Policy)

Yours faithfully,

proceeded against under Khyber-Pakhtunkhwa Civil Servants (Efficiency & Discipline) Rules, 2011, please.

Furthermore, those officers/officers who do not comply with promotion order will not be eligible to receive promotion in every condition. To include higher responsibilities in case of promotion. Therefore, it is obligatory upon every person who is to be promoted to ensure that he/she is not in a position to evade posting/transfer or allow lack of capacity to be a reason for not accepting the promotion. The basic rationale behind the rule is to prevent a person from being promoted to a higher position or to a higher grade by seeking to evade posting/transfer or allow lack of capacity to be a reason for not accepting the promotion.

1. As directed in letter to your letter No. SO/1/1000-Myra/2023 dated 18.04.2023 in the subject cited above and to state that sub-rule (5) of rule-7 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 stands deleted with this departmental notification dated 04.08.2020; thus, no provision exists to decide or forgo promotion.

2. Appointment dated 18.04.2023 in the subject cited above and to state that sub-rule (5) of rule-7 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 stands deleted with this departmental notification dated 04.08.2020; thus, no provision exists to decide or forgo promotion.

Dear Sir,

The Government of Khyber Pakhtunkhwa, Government & Revenue Department.



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
No. SO/1/1000-Myra/2023
Dated: 21.06.2023

62

Annexure - C

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
CIVIL SERVICIARIAT PESHAWAR
(Phone No.091-9223507)

No. SO (Primary-M)/E&SED/2-6/2023
Lahor 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

26/6/23

Subject: GUIDANCE REGARDING DELETION OF RULE 7(6) 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 herewith 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


(MUHAMMAD ISHAQ)
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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


SECTION OFFICER (PRIMARY MALE)
26/6/23



B/c -11-

No SO (Primary-M)/E&SED/2-6/2023
Dated Peshawar the June 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(S) IN THE KHYBER
PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION
AND TRANSFER) RULES, 1909.

I am directed to refer to the subject noted above and to enclose herewith 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)



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

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


Annexure
①


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

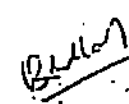
2. The meeting started with recitation from the Holy Quran. The chair welcomed the participants. The Deputy Director (Establishment) of Directorate of Elementary & Secondary Education briefed the forum regarding agenda item in detail.

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

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


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


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


(Mr. Balaqat Ullah)
General Secretary APTA
Peshawar


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

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



-13-
-B/C-

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

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/II	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)





No. 8145

File No. MSST/UG/2023

Khyber Pakhtunkhwa, Peshawar
Email: education@kpk.gov.pk

To
The Section Officer (Primary-4/5),
Elementary & Secondary Education Department,
Khyber Pakhtunkhwa Fellowship.

MINUTES OF THE MEETING

Subject: 2
Door No.

I am directed to refer to the letter No. SO/Primary-4/5/MSSED/23-11/GA/MS/Min/10 dated 10-07-2023 on the subject cited above and in present brief history about the background of the case as under

The Government of Khyber Pakhtunkhwa Establishment Department (Registration Wing) vide notification No. SOA-VI (E&AD)/1-1/2020 dated 06-08-2020. That this office sought guidance from your good office in the following words vide letter No. 6087 dated 06-02-2023.

(i) Now if eligibility upon the civil servant to accept promotion in every condition (ii) If it is the prerogative of the civil servant to either accept or turn down the offer of promotion.

That your good office forwarded the memo to the quarter concerned vide letter No. SO (Primary-4/5) MSSED/23-11/Appointment/2023 for necessary guidance. That the Government of Khyber Pakhtunkhwa Establishment Department (Registration Wing) vide letter No. SO (Policy) E&AD/1-1/2020 dated 06-08-2023 categorically stated that there shall be no provision in decline or forgo promotion. It is obligatory upon every civil servant to accept promotion under every condition.

The same was received by this office from your good office vide letter No. SO (Primary-4/5) MSSED/23-11/Appointment/2023 dated 12-06-2023.

That, in the light of the minutes of meeting dated 07-07-2023 held under the Chairmanship of Joint Additional Secretary Establishment at his office, has been asked for submission of consolidated case.

In view of the above, this office is of considered opinion that the decision of Rules 7(2) have affected negatively a huge number of Female Teachers. Thus it is proposed that Teachers below DP-16 may be exempted of implications of the amendment in the rules bid provided they submit their written request prior to conclusion of the meeting of Departmental Promotion Committee.

The case is submitted for perusal and necessary actions please.

(Signature)
Assistant Director (Grade A1-1)
Elementary & Secondary Education
Khyber Pakhtunkhwa

Encls: No. 1
Copy of the above is to:-

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

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

WP1442-2023 AZDIBLAAH VS GOVT OF PK43

(Handwritten mark)

[Handwritten signature]

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

In view of the above, this office is of considered opinion that the deletion of Rules 7(S) have affected negatively a huge members of female teachers.
The case is submitted for perusal and necessary actions 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 (Regulation Wing) vide letter No. 50 (Policy) EQAD/1-2/2020 dated 6-06-2023 accordingly stated that there exists no provision to decline for promotion, it is obligatory upon every civil servant to accept promotion under any condition.

That your good office forwarded the same to a/unders concerned vide letter No. 50 (Promotion) EQSED/2-2/Appointment/2023 for necessary guidance.

Dear Sir, I am directed to refer to letter no. (50) Promotion-M/E EQED/5-1/G/2023/ dated 30-7-2023 on subject cited above and to present brief history, about background of case as under:
That Government of KP Establishment department (Regulation Wing) vide notification No. N/S-2020 dated 08-08-2020. That this office sought guidance from your good office in the following words vide letter No. 6983 dated 06-07-2023.
(i) Now it is obligatory upon civil servant to accept promotion.
(ii) It is prerogative of civil servant to either accept/reject the offer of promotion.

Suggested Minutes of Meeting
KPK, Peshawar.
Elementary & Secondary Education Department
Section Officer (Promotion Male)
KPK, Peshawar.

RESHAHMA
(21-7-2023)



-16-

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

No. 50/Primary-M/88440/1-1/Appointment-Rules 7/893
Peshawar Dated 23rd 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. 50(Policy)/ EBAD/ 1-3/2020 dated 06th 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 or 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 FARHAN)
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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


SECTION OFFICER (PRIMARY MALE)
20/8/23

Scanned with CamScanner

[Handwritten signature]

1. D/Secy E&SE Khyber Pakhtunkhwa
2. PS to Secretary, E&SE Department (Khyber Pakhtunkhwa)
Copy forwarded to:
(Muzhammad Ishaq)
Section Officer (Army)
(Male)

In this connection it is submitted that in some cases body 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 body teacher in primary schools.

Those officers/officials who don't 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.

1-3/2020 dated 6th June 2023 and to state that after deletion of Rule 7(5) Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and Transfer Rules 1989) it has been intimated that those officers/officials who don't 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.

I am directed to refer to your letter No. 50 (Army) (Policy) /E&AD
Dear Sir,

SUBJECT: - Guidance regarding deletion of Rule 7(5) in the Civil Servant (Appointment, Promotion & Transfer Rules 1989)

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

To
Peshawar Dated 22nd August, 2023.
No. 50 (Army-M) /E&AD /A-21
Appointment - Rule / 2023

-B/c-
-17-

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.

-19-

- 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)

~~Final Order 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)

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/1-3/2020, 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&AD/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 28/01/2024



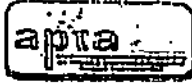
JEHAN ZADA

S/O GHULAM RAHM



Khyber Pakhtunkhwa

A-1- Utthi Khan
President
0333-0116040
www.utthi.gov.pk@gmail.com
utthi.gov.pk



APTA House
Govt. Primary School Near
Muzaffargarh Peshawar

آل پرائمری ٹیچرز ایسوسی ایشن (اپٹا) خیبر پختونخوا

Annexure - H

مہربان: میگزین ویٹری و ایگریکلچرل سائنس
مہربان: آل پرائمری ٹیچرز ایسوسی ایشن خیبر پختونخوا
تاریخ: 20/07/2023

گزارش ہے کہ پرموٹرز ہر افسسے سے ہوتے ہیں اور کہ سرکاری ادارہ کی خواہش ہوتی ہے پرموٹرز کا ایک ٹالون اڈا کہ تھا کہ جو تمام ایک اگر کسی
پہلے سے تھا ایک دن پرموٹرز میں تو وہ پھر آجہا پاد سال تک پرموٹرز میں سے کتنے سے مطلب پاد سال تک پراپریٹرز میں وہ کتنی ہی
پہر اس ٹالون میں کھوئی رعایت دیا گیا پاد سال ہفتہ تمام کہ وہاں کہ اگر ایک تمام ایک سال پرموٹرز نہ ہیں تو وہ دوسرے سال لے سکتا ہے
لیکن اب ایک ہفتہ پہلے ایک اور نوٹیفکیشن آیا ہے
اس کے مطابق اب ہر تمام پرموٹرز شروع نہیں لے کر نہیں ہیں کے ان کے خلاف لکھا گیا وہ لڑ کے مطابق کھانا کرنے کا کہا گیا ہے
اس میں یہ آئی نوٹیفکیشن ٹالون کے لئے خلاف ہوتا ہے سب کے لئے وہ لکھا اور پہلا قانون میں دیا کہ خواہش اساتذہ کو اپنا ہی مطالعات کا
مطابق کرنا چاہئے
تو کہ تمام حالات میں ہی لبرائی پرموٹرز اور دوسرا بھیجنا ہی ٹالون کے خلاف ہوتا ہے کہ کہ خیبر پختونخوا میں پرموٹرز سے ناواقف رہنے میں
کی ہوتی ہے ایسے حالات میں یہ یا نوٹیفکیشن جو 2022ء کی پمیل میں لبرائی کے جواب میں کیا گیا ہے جو ہفتہ اور ہزاروں انسانی حقوق کی خلاف ورزی
میں اس کے خلاف ہوتا ہے اور اس کی کوئی بھی کوئی نہ کہے ہی
لہذا ہم آپ سے ہرگز اپنی کہے ہی کہ کہ نوٹیفکیشن کو باہر لیا جائے یا اس میں ترمیم کر کے پرائمری اساتذہ کو (Delegation) دیا جائے اور ان کے
لبرائی پرموٹرز لینے کی ہولے ان کے سر میں سے لینے دیا جائے
اور پرائمری اساتذہ لینے کی صورت میں اساتذہ کو لبرائی دیا جائے لیکن یہ لبرائی نہ کی جائے
اس مسئلے میں آپ کو لبرائی دیا جائے اور (DPO) ال ای اور کہ ایک قسم میں اساتذہ کو لبرائی دیا جائے تاکہ اساتذہ کو سب کی لبرائی پرائمری اساتذہ کو لبرائی
البتہ اور ہرگز تک سے لبرائی جائے
کیونکہ نوٹیفکیشن ہلکا ہوتے ہی پرائمری اساتذہ کو لبرائی دیا جائے اور ہرگز نہ لبرائی دیا جائے خواہش ہوتی ہے
لہذا ہم یہ توقع رکھتے ہیں کہ آپ اساتذہ کو لبرائی دیا جائے اور سب کے پرائمری اساتذہ کو لبرائی دیا جائے اور اس (اپنی لبرائی سے لبرائی دیا جائے)

شکر ہے

منزلتہ خان سرہانی صدر
آل پرائمری ٹیچرز ایسوسی ایشن خیبر پختونخوا
20/07/2023

VAKALAT NAMA

BEFORE THE SERVICE TRIBUNAL PESHAWAR

JEHAN ZADA

Appellant

Versus

Government of KP & others

Respondents

I (the Appellant)

do hereby appoint and retain

MUHAMMAD MUAZZAM BUTT ASC. MUHAMMAD ADEEL BUTT AHC

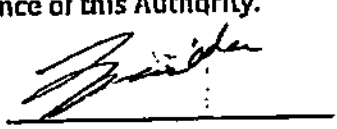
BASSAM AHMAD SIDDIQUI AHC

&

ASSOCIATES OF MUAZZAM LAW FIRM

to act and appear for me in the above Suit and on my behalf to conduct and prosecute (or defend) the same and all proceedings that may be taken in respect of any petition connected with the same or any decree or order passed therein and Applications for review to file and obtain return of documents, and to represent me/us and to take all necessary steps on my/our behalf in the above matter.

I agree to ratify all acts done by the aforesaid Advocate in pursuance of this Authority.



APPELLANT

ACCEPTED

MUHAMMAD MUAZZAM BUTT
Advocate Supreme Court

MUHAMMAD ADEEL BUTT
Advocate High Court

BASSAM AHMAD SIDDIQUI
Advocate High Court