

PROFORMA FOR EARLY HEARING

FORM 'A'

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 17981

Dated 15/11/24

To be filled by the Counsel/Applicant

Case Number	<i>Appeal. 913 / 2024</i>		
Case Title	<i>Latif Ahmad v/s DEO & others</i>		
Date of Institution			
Bench	SB <input checked="" type="checkbox"/>		DB <input type="checkbox"/>
Case Status	Fresh <input type="checkbox"/>		Pending <input checked="" type="checkbox"/>
Stage	Notice <input type="checkbox"/>		Reply <input checked="" type="checkbox"/> Argument <input type="checkbox"/>
Urgency to clearly stated.	<i>That the appellant has also challenged the pre-DPC High another case for staying the proceedings.</i>		
Nature of the relief sought.			
Next date of hearing	<i>3-12-2024</i>		
Alleged Target Date	<i>First available Bench</i>		
Counsel for	Petitioner <input type="checkbox"/>	Respondent <input type="checkbox"/>	In person <input type="checkbox"/>



Signature of counsel/party

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'B'

Inst#

Early Hearing _____ -p/20 _____

In case No. 913 -p/20 24

Latif Ali Vs DEO G. M. W.

Presented by _____ on behalf of _____. Entered in the relevant register.

Put up along with main case _____

REGISTRAR

Last date fixed	
Reason(S) for last adjournment, if any by the Branch Incharge.	
Date(s) fixed in the similar matter by the Branch Incharge.	
Available dates Readers/Assistant Registrar branch	

Assistant Registrar

REGISTRAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

CM No. /2024

In
SVC Appeal. 913/2024

Latif Ahmad Appellant

VERSUS

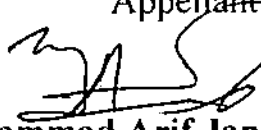
District Education Officer and others Respondents

**APPLICATION FOR EARLY FIXATION &
ACCELERATION DATE OF HEARING IN THE
ABOVE TITLED APPEAL.**

Respectfully Sheweth;

1. That the titled appeal is pending adjudication and is fixed for 03.12.2024.
2. That the illegal and unlawful pre DPC is in process and the appellant has good arguable case in hand, hence the instant application.
3. That there is no legal bar to file the instant application.

It is, therefore, most humbly prayed that the dated already fixed i.e 03.12.2024 may kindly be accelerated to a shortest possible date, in the best interest of justice.

Appellant
Through

Muhammad Arif Jan
Advocate High Court

AFFIDAVIT

I, Latif Ahmad (Appellant) do hereby solemnly affirm and declare on oath that the contents of the **application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

DEPONENT



439-509

16 (EOP)

Most Immediate

DIRECTORATE OF E&SE, KHYBER PAKHTUNKHWA.
NO: 439-509/NO:160/Ombud/PE/M.Afzal
Dated Peshawar the 16/07/2021.

AMR - B

To
All the District Education Officers,
Khyber Pakhtunkhwa.

Subject: REQUEST FOR ACTION.
Memo:

I am directed to refer to the letter No:PO/Complaints/514/06/2021/5062 dated 30-6-2021 on the subject noted above and to enclose herewith a self contained application/complaint received from the inhabitants of District Malakand filed by Muhammad Afzal and others, resident of District Malakand for consideration and appropriate action as per direction of the Provincial Ombudsman Secretariat Khyber Pakhtunkhwa.

I am further directed to ask you to direct your respective SDEOs/ASDEOs(M&F) that no degree will be acceptable without prior permission/NOC /Study leave. The instant case received from the Provincial Ombudsmen Secretariat, Khyber Pakhtunkhwa, filed by PSTs of District Malakand which is self explanatory wherein it has been stated that without observing the code formalities, i.e. Distance certificate from place of duty station and college as usually observed in such cases regular or private examination BSc Degree is considered on regular and age limit etc were 22 years while the candidate having 35 years. Usually for improving Bachelor Degree inspite of having BSc or M.Phil Degree particularly Degree from Quaid-e-Azam Degree college Faqir Abad Peshawar. Such fake and bogus Degree may not be entertained/ considered in future.

In order to proceed further into the matter, therefore, it is requested to inform all the concerned to observe the existing policy/rules, strictly and no degree will be acceptable without prior permission/NOC /Study leave within prescribed Age limit, otherwise strict disciplinary action will be taken against the defaulter.

Assistant Director (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa

- Copy forwarded to the:-
1. Registrar Provincial Ombudsman Secretariat w/r to his letter No. & date cited above.
 2. P.A. to Director E&SE, Local Directorate.

Assistant Director (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa

ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
CIVIL SECRETARITE PESHAWAR
(PHONE NO. 091-9223587)

17

Amex-C

Subject: MINUTES OF THE MEETING REGARDING ADDITIONAL SUBJECTS FOR PROMOTION OF SENIOR CADRE TO SST (GEN. MATH/PHY AND BIO/CH) HELD ON 26.10.2022

The subject meeting was held on 26-10-2022 at 11.00 AM under the Chairmanship of the Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa. The following attended the meeting:


1. Mr. Mutasim Dillah Shah Secretary E&SE Department..... (in chair)
2. Mr. Abdullah, Additional Secretary (Estab) E&SE Department
3. Mr. Sher Baz Khan Section Officer-I (Establishment Department)
4. Mst. Hamsheeda Begum DLO-IV (Law Department)
5. Dr. Iqbal Khan Additional Director E&SE KPK
6. Mst. Naghmata Sardar Additional Director E&SE KPK
7. Mr. Fazle Wahid Deputy Director E&SE KPK
8. Mr. Muhammad Ishaq Section Officer (Primary) E&SE D

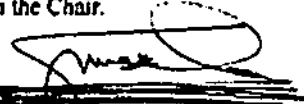
2. The meeting started with the recitation from the Holy Quran. The Chair welcomed the participants. The Additional Director (Estab) Directorate of E&SE, KPK explained the agenda items and briefed the forum regarding the issues raised in promotion cases due to additional subjects and further elaborated the case in light of the Service Rules of SSTs.

3. It was clearly noted by all participants of the meeting that Column-03 of Secondary School Teacher Service Rules provides that "At least second class Bachelor Degree from a recognized University" means that additional subjects cannot be considered as Degree. The representative of Law and Establishment Department also observed that the prescribed rules are related to Bachelor Degree and there is no mention of word "additional subject" etc.


4. After thorough discussion the participants of the meeting agreed to consider only the degree which is entered in the Service Book of the teachers for the first time, for promotion.


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

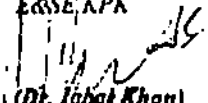

(Mr. Muhammad Ishaq)
Section Officer (Primary)
E&SE Department



(Mr. Sher Baz Khan)
Section Officer (R-I)
Establishment Department



(Mst. Hamsheeda Begum)
DLO-IV
Law Department


(Mr. Fazle Wahid)
Deputy Director (Estab)
E&SE KPK


(Mst. Naghmata Sardar)
Additional Director (Estab)
E&SE KPK


(Dr. Iqbal Khan)
Additional Director (Estab)
E&SE KPK


(Mr. Abdullah)
Additional Secretary (Estab)
E&SE Department


(Mr. Mutasim Dillah Shah)
Secretary
E&SE Department

ATTESTED

