

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA**  
**SERVICES TRIBUNAL PESHAWAR**

CM Petition \_\_\_\_\_/2024

In Service Appeal No. 2589/23

Muhammad Yaseen Shah Versus Govt. of KPK etc

**Service Appeal**

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Dated: 25/07/2024

  
**Asad Aziz Mahsood**  
Advocate High Court

**Humble Appellant**  
  
**Muhammad Yaseen Shah**  
Through Counsel

①

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA**  
**SERVICES TRIBUNAL PESHAWAR**

CM. Petition \_\_\_\_\_/2024

In Service Appeal No.

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 14576

Dated 29-07-24

Muhammad Yaseen Shah Versus Govt. of KPK etc

**Service Appeal**

**APPLICATION FOR ALLOWING THE APPELLANT TO PLACE**  
**CERTAIN DOCUMENTS ON FILE**

Respectfully Sheweth:-

That appellant humbly submits as under:-

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

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

Dated: 25/07/2024

**Humble Appellant**

**Muhammad Yaseen Shah  
Through Counsel**

**Asad Aziz Mahsood  
Advocate High Court**

②

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA**

**SERVICES TRIBUNAL PESHAWAR**

CM Petition \_\_\_\_\_/2024

In Service Appeal No.

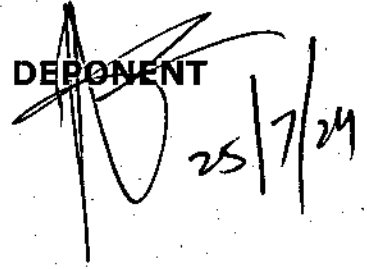
Muhammad Yaseen Shah      Versus      Govt. of KPK etc

**Service Appeal**

**AFFIDAVIT**

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

**DEPONENT**

  
25/7/24



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



NO\_10167\_/ DATED \_07\_/ \_09\_/2023

Annexure (I) (3)

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

**Subject:** VERIFICATION LETTER DATED 07.08.2023

**Memo:**

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

*9/12/23*  
DISTRICT EDUCATION OFFICER (M)  
SOUTH WAZIRISTAN

*Attested*



Amir II

(4)

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

**NOTIFICATION**

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

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

**TERMS AND CONDITIONS**

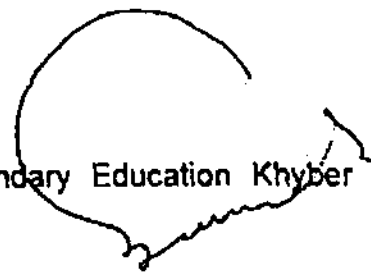
1. Charge reports should be sent to all concerned.
2. No TADA etc. are allowed.
3. The order of the above named SSTs/TT against the posts of ADEO/ASDEOs will be effective subject to the condition that they will give an under taking on judicial stamp paper to the District Education Officers concerned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

**Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa**

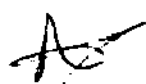
Endst: No. 8286-89 /A-12 F.No.27 (A)/ADEO (M) Dated Pesh: the 10-07-2024

Copy forwarded to the:-

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

  
10/7/24

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

Attested  




Annexure III

(5)

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-9233533

Dated Peshawar the October, 28 2021

**NOTIFICATION**

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

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

**SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT**

**Endst: of even No. & Date**

Copy forwarded to the:

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

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

Attested  
A

Annexure IV  
5



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-9210626

Dated: 13<sup>th</sup> December, 2023

**NOTIFICATION**

**NO.SO(MC)E&SED/A-16/2023/Posting/Transfer/MC/:** The following posting/ transfer are hereby ordered with immediate effect, in the best public interest: -

Sr. No	Name	FROM	TO	Remarks
1.	Masood Khan TC BS-17	ADEO Wana South Waziristan	SDEO (Male) Wana South Waziristan	V.S.No.2
2.	Aurang Zeb TC BS-16	SDEO (male) Wana South Waziristan	ADEO Wana South Waziristan	V.S.No.1

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Ends: of even No.& date:

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Accounts Officer Concerned.
4. District Education Officer (Male/Female) Concerned.
5. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.

111 / 13.12.2023

SECTION OFFICER (Management Cadre)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-9210626

Annexure (V)  
6

Dated: 13<sup>th</sup> December, 2023

**NOTIFICATION**

**NO.SO(MC)E&SED/4-16/2023/Posting/Transfer/MC/:** The following posting/ transfer are hereby ordered with immediate effect, in the best public interest: -

Sr. No	Name	FROM	TO	Remarks
1.	Masood Khan TC BS-17	ADEO Wana South Waziristan	SDEO (Male) Wana South Waziristan	V.S.No.2
2.	Aurang Zeb TC BS-16	SDEO (Male) Wana South Waziristan	ADEO Wana South Waziristan	V.S.No.1

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Endst: of even No.& date:

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Accounts Officer Concerned.
4. District Education Officer (Male/Female) Concerned.
5. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.

111 / 13.12.2023  
ON

SECTION OFFICER (Management Cadre)

Attested