

URGENT FORM

IN THE PESHAWAR HIGH COURT BANNU BENCH
BANNU

Title:

Abdul Samad Khan.

(Petitioners)

VERSUS

Govt of K.P.

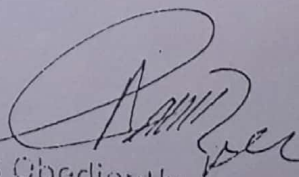
(Respondents)

Will you kindly treat the accompanying petition an urgent and in accordance with the provision of Rules-9, Chapter 3-A rules orders of the High Court, Lahore Volume-V.

The grounds for urgency are:

1) The instant w.p is of service matter involve fundamental rights

Dated: 02/10/20.


Yours Obediently,

IN THE PESHAWAR HIGH COURT, PESHAWAR
OPENING SHEET FOR WRIT BRANCH

Date of Filing: 10/10/20
 District: N.W.T-2

Case Type: Writ Petition Nature of Original Proceeding:

Category Code: 050707

(Categories & Sub categories are given at the back of the opening sheet)

Review/ Contempt of Court in respect of: _____ of: _____

Writ of: Habeas Corpus Prohibition Mandamus Quo Warranto Certiorari

If Certiorari:

Forum which passed impugned order	Date	(I)nterlocutory/ (F)inal Order

Case Pertains to
 SB
 DB

Petitioner Name: Abdulsamad Khan
 Mobile No.: _____
 Address: Gahayom Shaikhimara N.W.T-2
 CNIC No.: _____
 Email Address: _____

Counsel for Petitioner (s): Muhammad Asghar Khan Ahmadzai
 Mobile No.: 0333-97110067
 Address: Just & session - Courts Bannu
 CNIC No.: 1161-4035851-7
 Email Address: asgharadvocate07@gmail.com

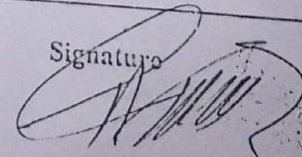
Respondents: Govt of K.P. Throughs of Educator
 Address: _____

Original Order/Action/Inaction Complained of: order/action of Educator department regarding Tenzil Queta.

Prayer: on acceptance of instant w.p the appropriate order of R no 5-6 on Tenzil Basis may very grateful

Law/Rules/governing the original proceedings/action/inaction: Art. 199 Constitution of Islamic Republic of P.

Note: Any suggestion to improve the proforma will be appreciated.

Signature: 

**IN THE COURT OF HON'BLE PESHAWAR HIGH COURT
PESHAWAR BENCH BANNU.**

CHECK LIST

S.No	Description	Yes	No
1	Case Title <u>Abdul Samad</u> vs. <u>Govt</u>	--	--
2	Case is duly signed	Yes	No
3	The law under which the is preferred has been mentioned	Yes	No
4	Approved file cover is used	Yes	No
5	Affidavit is duly attested and appended	Yes	No
6	Case and annexures are properly paged and numbered according to index	Yes	No
7	Copies of annexures, are legible and attested. If not, then better copies duly attested have been annexed.	Yes	No
8	Certified copies of all the requisite documents have been filed.	Yes	No
9	Certificate specifying that no case on similar grounds was earlier submitted in this court, filed.	Yes	No
10	Case is within time	Yes	No
11	The value for the purpose of court fee and jurisdiction has been mentioned in the relevant column	Yes	No
12	Court fee in shape of stamp paper is affixed. (For writ Rs: 500/- for other as required)	Yes	No
13	Power of attorney is in proper form	Yes	No
14	Memo of addressed filed	Yes	No
15	List of books mentioned in the petition	Yes	No
16	The requisite number of spare copies attached (writ petition-3 Nos, Civil Appeal (SB-1, DB-2) Civil Revision (SB-1, DB-2)	Yes	No
17	Case (Revision/Appeal/Petition etc) is filed on the prescribed form	Yes	No
18	Power of attorney is attested by jail authority (for jail prisoners only)	Yes	No

It is certified that formalities/ documentation as required in column 2 to 18 above, have been fulfilled.

Signature: [Signature]
Dated: 09/10/2020

For Office use only

Case NO, _____
Case received _____
Complete in all respect: Yes/NO (if no the grounds) _____
Date in court _____

Signature _____
(Reader)

Date: _____

Countersigned _____

**BEFORE THE HON'BLE PESHAWAR HIGH COURT,
BANNU BENCH**

Writ Petition # _____/2020

Abdul Samad Khan S/o Abdul Haleem R/o Shahemar Nawab Kot, Tehsil
Garyum District North Waziristan ~~~~~~ (Petitioner)

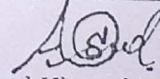
VERSUS

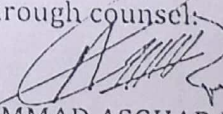
The Govt. of Khyber Pakhtunkhwa through Secretary Education
Peshawar and others ~~~~~~ (Respondents)

I.N.D.E.X

S#	Description of documents	Annexed as	Page(s)
1	Grounds for writ petition and Affidavit		1 to 7
2	Copy of advertisement	A	8
3	Copy of tentative Merit list	B	9
4	Copy of tentative merit list of GPS Samir Gul Kot	C	10
5	Copy of list of candidates shortlisted for interview	D	11
6	Copy of list of provisionally included respondent #6	E	12
7	Copy of application of petitioner	F	13
8	Copy of impugned appointment order	G	14
9	Copy of notice and its receipt		15
10	Court Fee Rs. 500/-		16
11	Vakalat Nama		17

Dated: 07/9/2020


Abdul Samad Khan (Petitioner)
Through counsel:


MUHAMMAD ASGHAR KHAN
AHMADZAI
Advocate High Court Bannu

BEFORE THE HON'BLE PESHAWAR HIGH COURT,
BANNU BENCH

Writ Petition # _____/2020

Abdul Samad Khan S/o Abdul Haleem R/o Shahemar Nawab Kot, Tehsil
Garyum District North Waziristan ~~~~~ (Petitioner)

VERSUS

1. The Govt. of Khyber Pakhtunkhwa through Chief Secretary
Khyber Pakhtunkhwa, Peshawar.
2. The Govt. of Khyber Pakhtunkhwa through Secretary
Elementary & Secondary Education Peshawar.
3. The Sub-Divisional Education Officer, North Waziristan.
4. The District Education Officer (Male), North Waziristan.
5. Syed Noorani S/o Rahmat Nawaz R/o Shahemar Tehsil Razmak
District North Waziristan.
6. Shams-ud-Din S/o Altaf Rehman R/o Shera Tala Madi Khel
Tehsil Mirali District North Waziristan.

~~~~~ (Respondents)

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF THE  
ISLAMIC REPUBLIC OF PAKISTAN, 1973.

PRAYER:

ON ACCEPTANCE OF THE INSTANT WRIT PETITION THIS  
HON'BLE COURT MAY VERY GRACIOUSLY BE PLEASED TO  
DECLARE APPOINTMENT ORDERS BEARING ENDST: #5137-48  
DATED 14/5/2020 TO THE EXTENT OF RESPONDENTS #5 & 6  
AS AGAINST THE RULES, POLICY, LAW, TERMS AND CONDITION  
OF ADVERTISEMENT BASED ON MALAFIDE INTENTION,  
ULTRA-VIRES AND LIABLE TO CANCELLATION. THIS HON'BLE  
COURT MAY FURTHER BE PLEASED TO DIRECT THE

RESPONDENT #4 TO APPOINT THE PETITIONER ON THE POST OF PRIMARY SCHOOL TEACHER (PST) IN EDUCATION DEPARTMENT NORTH WAZIRISTAN ON MERITS AND ACCORDING TO LAW, TERMS AND CONDITIONS OF ADVERTISEMENT, ANY OTHER RELIEF DEEMS FIT IN THE CIRCUMSTANCES OF THE CASE.

INTERIM RELIEF:

Since this writ petition might take some time in disposal and the respondent #4 is going to finalize appointment process on the posts of PST, therefore, interim relief in the shape of suspension of impugned appointment order to the extent of respondents #5&6, may kindly be granted till the final disposal of this writ petition.

Note:

=====  
Addresses of parties given above are correct and sufficient for the purpose of service.  
=====

Respectfully Sheweth:

1. Brief facts of the case are that the respondent #4 vide advertisement dated 01/01/2019, invited applications from eligible candidates to fill vacant posts of CT, DM, PET, TT, AT and PST. (Copy of advertisement is annexed "A").
2. That, the petitioner being eligible candidate also applied for the posts of Primary School Teacher (PST) and participated in examination held by the Educational Testing and Evaluation

Agency (ETEA). The petitioner obtained 45 marks in ETEA test and obtained total 97.88 marks.

3. That, the petitioner on the basis of total obtained marks was placed at 4<sup>th</sup> position in the tentative merit list of GPS Garyum. (Copy of tentative Merit list is annexed "B").
4. It is pertinent to mention that the respondent #5 was at serial #10, code 107433, GPS Samir Gul Kot while name of respondent #6 exists nowhere in the tentative merit list or the list finalized for interview. (Copy of tentative merit list of GPS Samir Gul Kot and copy of list of candidates shortlisted for interview are annexed "C & D").
5. Notwithstanding, the respondent #4 with malafide intention and under political influence, managed and prepared separate merit list named "Provisionally Included" and thereby selected the respondent #6 for appointment against the post of PST GPS Garyum. (Copy of list of provisionally included respondent #6 is annexed "E").
6. That, the petitioner submitted application to the respondent #4 for necessary rectification and scrutiny regarding appointment of respondent #6 but no heed was paid. (Copy of application is annexed "F").
7. That, the petitioner made repeated requests to respondent #4 but he paid no heed and rather issued the impugned

appointment order whereby the respondents #5&6 were appointed against the vacant post of PST GPS Garyum and GPS Samir Gul Kot. (Copy of impugned appointment order is annexed "G").

8. Feeling aggrieved, from the act of respondents, the petitioner having no other remedy but to invoke the inherent jurisdiction of this Hon'ble Court, *inter-alia* on the following grounds:

GROUNDS:

- (1) That, the impugned appointment order to the extent of respondents #5&6, is against the law, facts, merit list, based on malafide intention, political influence, without notice; hence, the same is untenable in the eyes of law.
- (2) That, the petitioner has scored good marks as per tentative merit list and keeping in view the terms and conditions of advertisement, the petitioner was supposed to be appointed on the vacant post of PST GPS Garyum, however, the respondent #5, despite hailing from Tehsil Razmak, with malafide intention manipulated three Domicile Certificates i.e. two of Tehsil Razmak and one of Tehsil Garyum and the respondent #4 adjusted him on the vacant post of PST Garyum at serial #3 of the impugned appointment order which is clear cut encroachment upon the fundamental and legal rights of petitioner. (Copy of three Tribal Domicile Certificates of respondent #5 are annexed H1 to H3).

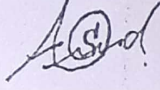


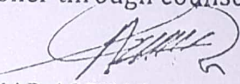
- (3) That the Post for PST has been advertised on 01-01-2019. While the respondent No.6 has got CNIC on 30-01-2019.
- (4) That the respondent No.6 has not been applied online on Govt. Primary School Sameer Gul Kot having Code No.107433 but mela fidely appointed on the said School. The same is clear cut violation of petitioner's rights. Moreover as per list of candidates called for interview Dated: 17-02-2020 the name of respondent No.6 has not included.
- (5) That, malafide, ulterior motive, deviation from standing rules and policy is clear from the face of tentative merit list whereby name of respondent #6 was neither mentioned in the list of candidates shortlisted for interview nor in the tentative merits list and the respondent #4 with malafide intention and due to political influence, created separate merits list in the name of "Provisionally Included" and adjusted the respondent #6 against appointment at GPS Samir Gul Kot, which act of respondent #4 is quite objectionable and prima-facie he has made mockery of the rules and police of recruitment.
- (6) That, the petitioner is most suitable candidate and is entitled to be appointed as PST on the basis of merit cum fitness and no reparation would be made if he is expelled in such way and not treated according to law, rules and policy.

- (7) That, it is the spirit of law and Constitution of the Islamic Republic of Pakistan, 1973 that all citizens must be treated equally and impartially.
- (8) That, the act of respondents is a clear violation of Article 25 of the Constitution of the Islamic Republic of Pakistan, 1973.
- (9) That, the petitioner's counsel respectfully seeks permission of this Hon'ble Court to advance and rely on additional grounds at the time of hearing of instant writ petition.

For the abovementioned reasons, it is therefore, respectfully prayed that this writ petition may graciously be accepted as prayed for just to meet the ends of justice.

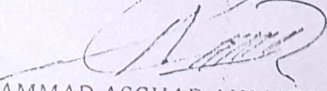
Dated: 07/9/2020

  
Petitioner through counsel:

  
MUHAMMAD ASGHAR AHMADZAI--  
Advocate High Court Bannu

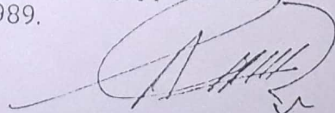
CERTIFICATE:

This is to certify that no such petition is neither pending nor filed before any other forum.

  
MUHAMMAD ASGHAR AHMADZAI  
Advocate High Court Bannu

LIST OF BOOKS:

- 1- The Constitution of Islamic Republic of Pakistan 1973.
- 2- The Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.
- 3- Case law accordingly.

  
MUHAMMAD ASGHAR AHMADZAI  
Advocate High Court Bannu

**BEFORE THE HON'BLE PESHAWAR HIGH COURT,**  
**BANNU BENCH**

Writ Petition # \_\_\_\_\_/2020

Abdul Samad Khan S/o Abdul Haleem R/o Shahemar Nawab Kot, Tehsil  
Garyum District North Waziristan ~~~~~ (Petitioner)

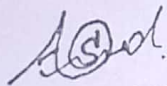
VERSUS

The Govt. of Khyber Pakhtunkhwa through Secretary Education  
Peshawar and others ~~~~~ (Respondents)

AFFIDAVIT

I, the petitioner do hereby solemnly affirm and declare on oath that the contents of instant writ petition are true and correct to the best of my knowledge and belief and that nothing has been kept secret or concealed from this Hon'ble Court.

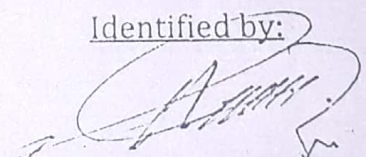
Deponent:



Abdul Samad Khan  
S/o Abdul Haleem --- Petitioner

C.N.I. :- 21503-7321017-3

Identified by:

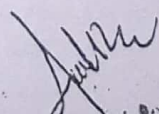
  

MUHAMMAD ASGHAR AHMADZAI  
Advocate High Court Bannu

14203

Sept 20  
Abdul Khalim

10th  
Abdul Samad  
TDNW  
Muhammad Asghar Adv





OFFICE OF THE DISTRICT EDUCATION OFFICER NORTH WAZIRISTAN MINRAIS-141  
 Test for PST hold on 06/10/2019

SCHOOL-WISE TENTATIVE MERIT LIST FOR PST MALE CANDIDATES (North Waziristan Tribal District)

107891 = GPS Ganyum (PST BPS-12) No of Vacant Post = 1

| S/N | School Code | FATHER NAME | SSC/Matric 10 |       | Intermediate 20 |       | Recovery/22 |       | Vocational |       | BPS-12     |       | No of Vacant Post = 1 |       | Total Acad. Score | Test Marks | G. Total Score | Remarks |            |       |      |      |
|-----|-------------|-------------|---------------|-------|-----------------|-------|-------------|-------|------------|-------|------------|-------|-----------------------|-------|-------------------|------------|----------------|---------|------------|-------|------|------|
|     |             |             | Matr. Mark    | Score | Matr. Mark      | Score | Matr. Mark  | Score | Matr. Mark | Score | Matr. Mark | Score | Matr. Mark            | Score |                   |            |                |         | Matr. Mark | Score |      |      |
| 1   | 1001        | ABDUL QADIR | 80            | 10.48 | 713             | 1160  | 13.96       | 274   | 55         | 0.64  | 578        | 1150  | 12.95                 | 678   | 0                 | 0          | 0              | 0       | 1481       | 37    | 1518 | 100% |
| 2   | 1002        | ABDUL QADIR | 80            | 10.48 | 713             | 1160  | 13.96       | 274   | 55         | 0.64  | 578        | 1150  | 12.95                 | 678   | 0                 | 0          | 0              | 0       | 1481       | 37    | 1518 | 100% |
| 3   | 1003        | ABDUL QADIR | 80            | 10.48 | 713             | 1160  | 13.96       | 274   | 55         | 0.64  | 578        | 1150  | 12.95                 | 678   | 0                 | 0          | 0              | 0       | 1481       | 37    | 1518 | 100% |
| 4   | 1004        | ABDUL QADIR | 80            | 10.48 | 713             | 1160  | 13.96       | 274   | 55         | 0.64  | 578        | 1150  | 12.95                 | 678   | 0                 | 0          | 0              | 0       | 1481       | 37    | 1518 | 100% |
| 5   | 1005        | ABDUL QADIR | 80            | 10.48 | 713             | 1160  | 13.96       | 274   | 55         | 0.64  | 578        | 1150  | 12.95                 | 678   | 0                 | 0          | 0              | 0       | 1481       | 37    | 1518 | 100% |
| 6   | 1006        | ABDUL QADIR | 80            | 10.48 | 713             | 1160  | 13.96       | 274   | 55         | 0.64  | 578        | 1150  | 12.95                 | 678   | 0                 | 0          | 0              | 0       | 1481       | 37    | 1518 | 100% |
| 7   | 1007        | ABDUL QADIR | 80            | 10.48 | 713             | 1160  | 13.96       | 274   | 55         | 0.64  | 578        | 1150  | 12.95                 | 678   | 0                 | 0          | 0              | 0       | 1481       | 37    | 1518 | 100% |
| 8   | 1008        | ABDUL QADIR | 80            | 10.48 | 713             | 1160  | 13.96       | 274   | 55         | 0.64  | 578        | 1150  | 12.95                 | 678   | 0                 | 0          | 0              | 0       | 1481       | 37    | 1518 | 100% |
| 9   | 1009        | ABDUL QADIR | 80            | 10.48 | 713             | 1160  | 13.96       | 274   | 55         | 0.64  | 578        | 1150  | 12.95                 | 678   | 0                 | 0          | 0              | 0       | 1481       | 37    | 1518 | 100% |
| 10  | 1010        | ABDUL QADIR | 80            | 10.48 | 713             | 1160  | 13.96       | 274   | 55         | 0.64  | 578        | 1150  | 12.95                 | 678   | 0                 | 0          | 0              | 0       | 1481       | 37    | 1518 | 100% |

(Member)  
 Abdul Ali, Provincial GHS Regional Killa  
 District North Waziristan

(Member)  
 Fida Khan ADEO  
 District North Waziristan

(Member)  
 Noor Ullah Jan ADEO  
 District North Waziristan

(Chairman)  
 District Education Officer  
 North Waziristan Tribal District



11  
D<sub>2</sub>

| NO | NO    | NAME              | FATHER NAME        | TEST    |
|----|-------|-------------------|--------------------|---------|
| 46 | 22878 | SHAH FASAL        | KHONAMAR KHA       | DOSSALI |
| 47 | 23181 | SHAHID IQBAL      | AZIZ UR REHMAN     | DOSSALI |
| 48 | 23407 | SHAHZAD AHMAD     | ALAM SHER          | DOSSALI |
| 49 | 24692 | SHAKIL ANWAR      | SHAFIQ UR RAHMAN   | DOSSALI |
| 50 | 24652 | SHERZAM ULLAH     | MUHAMMAD AMIR KHAN | DOSSALI |
| 51 | 23590 | SIRAJ UDDIN       | WAKIL KHAN         | DOSSALI |
| 52 | 20501 | STEED AMAN        | SAHIB JAN          | DOSSALI |
| 53 | 22782 | TAHIR NAWAZ KHAN  | MIR SANIB KHAN     | DOSSALI |
| 54 | 21614 | TARIQ NAWAZ       | ASAL NAWAZ         | DOSSALI |
| 55 | 24280 | ZAHIR ULLAH       | HAFIZ AZAM KHAN    | DOSSALI |
| 56 | 21017 | ABDUS SAMMAD KHAN | ABDUL HALEEM       | GARTUW  |
| 57 | 24777 | ADHANI VAZIR      | KHUSHAL KHAN       | GARTUW  |
| 58 | 21885 | ASMAT ULLAH KHAN  | HAFI AMIR GUL      | GARTUW  |
| 59 | 20248 | BISMILLAH JAN     | REHMAT JAN         | GARTUW  |
| 60 | 22660 | GUL BADDI         | RAHWAN GUL         | GARTUW  |
| 61 | 22899 | KIFAyat ULLAH     | TELAWAT KHAN       | GARTUW  |
| 62 | 23115 | MAHEOOD UR REHMAN | HABIB UR REHMAN    | GARTUW  |
| 63 | 20282 | RAZA ALI          | MUHAMMAD WAR JAN   | GARTUW  |
| 64 | 25074 | SERAJ UDDIN       | ALTAJ UR REHMAN    | GARTUW  |

12

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**OFFICE OF THE DISTRICT EDUCATION OFFICER, NORTH WAZIRISTAN MIRANSHAH**

Page No: 1

**SCHOOL-WISE TENTATIVE MERT LIST FOR PST MALE CANDIDATES (North Waziristan Tribal District)**

Test for PST held on 06/10/2019

Provisionally Included

| Sl. No. | Name        | Father's Name    | Squad No. 201 |       | Intermediate-20 |       | Provisional/AD |       | Mert/200 |       | Mert/201 |       | Mert/202 |       | TOTAL Acad. Score | Test Marks | G.Total Score | DOB | Photo | Signature | Remarks |
|---------|-------------|------------------|---------------|-------|-----------------|-------|----------------|-------|----------|-------|----------|-------|----------|-------|-------------------|------------|---------------|-----|-------|-----------|---------|
|         |             |                  | Roll No.      | Score | Roll No.        | Score | Roll No.       | Score | Roll No. | Score | Roll No. | Score |          |       |                   |            |               |     |       |           |         |
| 1       | SAJID ULLAH | ALFARUK ROYAL/AD | 15-20         | 18.75 | 120             | 110   | 1154           | 84    | 550      | 1135  | 715      | 1500  | 1105     | 56.45 | 96                | 112.45     | 12/20/96      |     |       |           |         |

TOTAL Acad. Score: 56.45

Test Marks: 96

G.Total Score: 112.45

DOB: 12/20/96

Signature: [Signature]

Remarks: [Remarks]

Date: 20/10/2019

Time: 11:00 AM

Page No: 1

Total Pages: 1

District Education Officer  
North Waziristan Tribal District

(Chairman)

District Education Officer  
North Waziristan Tribal District

(Member)

Noor Ullah Jan ADEO  
District North Waziristan

(Member)

Ejaz Khan ADEO  
District North Waziristan

(Member)

Abdul Aziz Pringlan GHS Raghul Killa  
District North Waziristan

(Member)

Rahim Ahmad GHS Miran Shah  
District North Waziristan

(Member)

[Signature]



(13)

F3  
E3

صوبہ سندھ دوسٹریکٹ ایجوکیشن آفیسر (DEO) ضلع نارتھ وزیرستان

صوبہ سندھ

مدرسہ - objection تاخیر میرٹ لسٹ PST order تحصیل نارتھ وزیرستان

سودا گدا شمس کھانم کے لیے کہ شمس الدین ولد اعطاف الرحمن نامی PST انٹرویو شدہ طلبہ لسٹ

میں نہیں تھا۔ میرٹ لسٹ تاخیر میرٹ لسٹ نامی کہ لید شمس الدین نامی علیحدہ میرٹ لسٹ

میں بنا دیا گیا تھا۔ اس کے نام کے ساتھ میرٹ لسٹ میں (Provisionally included)

لکھا ہوا تھا۔ جس میں سکول کوڈ موجود نہیں تھا۔ عمومی شناختی کارڈ نمبر موجود نہیں تھا

شمس الدین ولد اعطاف الرحمن 3-2128043-21505-CNIC No عمومی شناختی

کوڈ نمبر تحصیل برسر عمل ہے۔ Dual دو صیغے میں بولڈ ہے۔

متعلق Address سہ ماہی میں تحصیل برسر عمل ہے۔ تحصیل برسر عمل کا ڈیوٹی پل

PST امتحان کے بعد بنا دیا گیا ہے۔ شمس الدین Appointment order

First No-1 برسر عمل نمبر کوڈ تحصیل برسر عمل پر لکھا گیا ہے۔

آپ صاحبان سے گزارش کی جاتی ہے کہ شمس الدین نامی کو PST order اور Data verification کو جانے

ملاقات اذنی بندہ مولتی کاروائی سے رجوع کرنے کا مستحق ہو گا۔ تاہم الفاف

جانتا ہے پورا ہو سکے۔

میں لوازش ہوگی

Handwritten signature

Dated: 22/07/2020

تحصیل نارتھ وزیرستان

CNIC No-21503-7321017-3

DEO (N) as per resolution

میر عبدالحمد ولد عبدالحلیم

Director (Etab) State of Education Miraj Peshawar

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**OFFICE OF THE  
DISTRICT EDUCATION OFFICER NORTH WAZIRISTAN**

Phone & and Fax No. 0928-313045

**Appointment Order**

Consequent upon the recommendations of the Departmental Selection Committee, appointment of the following candidates is hereby ordered against the posts of **Primary School Teacher (PST)** Tehsil wise School based in BPS-12 @ (Rs.13320-960-42120) fixed plus usual allowances as admissible to them under the rules on ad hoc / contract basis in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge after summer vacations / Re-opening of schools, in the best interest of public service.

| S.NO | NAME              | FATHER NAME     | CNIC          | SCORE  | CODE   | PLACE OF POSTING  |
|------|-------------------|-----------------|---------------|--------|--------|-------------------|
| 1    | SHAMS UD DIN      | ALTAF UR REHMAN | 2150521290433 | 112.45 | 107433 | GPS Samir Gul Kot |
| 7    | MAHBOOB UR REHMAN | HABIB UR REHMAN | 2150310313025 | 105.85 | 107433 | GPS Samir Gul Kot |
| 3    | SYED NURANI       | RAHMAT NAWAZ    | 2150786662529 | 101.33 | 107891 | GPS Garyum        |

**TERMS & CONDITIONS:**

1. TA/DA is not allowed.
2. They are directed to take over charge of their duties just after re-opening of educational institutions. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely temporary on ad hoc & contract basis initially for one year till 13-05-2021.
4. Appointment is subject to the condition that certificates/degrees must be verified from the concerned authorities by office of the District Education Officer, North Waziristan Tribal District. Anyone found producing bogus Documents / Testimonials will be proceeded as per rules.
5. Their services are liable to termination on one month prior notice from either side. In case of resignation without notice their one-month pay/allowances shall be forfeited to the Government.
6. Pay will not be drawn until and unless a certificate to this effect by office of the District Education Officer, North Waziristan Tribal District is issued that their certificate/ Degrees are verified.
7. They should join their posts within fifteen days of the issuance of this appointment order. In case of failure to join their posts within fifteen days, their appointment will expire automatically and no subsequent appeal etc shall be entertained.
8. Health and Age Certificates should be produced from the Medical Superintendent concerned before taking over charge.
9. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
10. They will get 09 months in service, mandatory professional induction training from PITE or RITE.
11. Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period. In case of misconduct, they shall be processed under the rules framed from time to time.
12. Their appointment is School based, they will have to serve at the place of posting, and their services are not transferable to any other station.
13. Before handing over charge once again their documents may be checked if they have not the required qualifications they may not be handed over charge.
14. They should not be handed over charge if their age exceeds thirty five years.

NOTICE UNDER RULE 2(3) OF CHAPTER 4-I VOLUME-V  
OF THE HIGH COURT RULES AND ORDERS

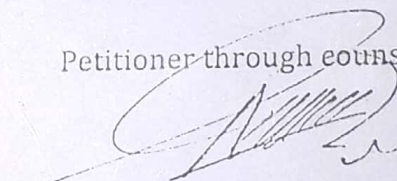
To

The District Education  
Officer North Waziristan  
Miranshah.

Kindly take a notice under the above referred rules of the High Court to the effect that the petitioner Abdul Samad Khan S/o Abdul Haleem R/o Shahemar Nawab Kot, Tehsil Garyum District North Waziristan (Candidate for the post of PST) is going to institute a writ petition in the Hon'ble Peshawar High Court Bannu Bench against you and other respondents on the grounds mentioned in the writ petition. (Copy of writ petition is hereby annexed for your information please)

Dated: 07/9/2020

Petitioner through counsel:

  
MUHAMMAD ASGHAR AHMADZAI  
Advocate High Court Bannu

## وکالت نامہ

عبداللہ عالمی لیٹرا اور ہائی کورٹ لیجسٹری

۲۰، منجاب سسر  
بنام حکومت

عبدالعزیز

مورخہ

مقدمہ

جرم

تھانہ

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کاروائی متعلقہ ان مقام ہونا کیلئے  
محمد آصف عرفان الہمدانی مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار  
ہوگا۔ نیز وکیل صاحب کو راضی نامہ تقریر ثالث و فیصلہ پر حلف دینے جو اب دہی اور اقبال ڈوٹی اور بصورت ڈگری کرانے اجراء اور وصولی  
چیک، روپیہ اور عرضی اور درخواست ہر قسم کی تصدیق زر اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت ڈگری کرانے اجراء اور وصولی چیک  
، روپیہ اور عرضی اور درخواست ہر قسم کی تصدیق زر اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یک، طرفہ یا اپیل کی  
برآمدگی اور منسوخی دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے  
واسطے کسی اور وکیل یا مختیار قانونی کو اپنے ہمراہ یا کوئی اپنے بجائے تقریر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور بالا اختیارات حا  
صل ہوں گے اور اس کا ساختہ و پرداختہ بھی منظور قبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ اس  
کے مستحق وکیل صاحب موصوف ہوں گے۔ نیز بقایا و خرچہ کی وصولی کرنے کا بھی اختیار ہوگا۔ اگر کوئی کوئی تاریخ پیشی مقام دورہ پر ہوا پیشی  
سے باہر تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مقدمہ مذکور کریں۔ نیز اگر کسی بھی وجہ مثلاً بیماری، معذوری، علالت وغیرہ کی وجہ سے  
عارضی یا مستقبل پیروی مقدمہ نہ کر سکیں تو بھی وکیل صاحب یا اس کے لواحقین کو بقایا فیس (اگر کوئی ہے) ادا کرنے کا پابند ہونگے اور ادا  
شدہ فیس کی واپسی کا تقاضہ کرنے کا حق نہیں ہوگا۔ مضمون وکالت نامہ سن اور سمجھ کر وکالت نامہ لکھ دیا تاکہ سندر ہے۔

المرقوم ۱۵ ماہ ۲۰ حکم ۲۰ العبد  
گواہ شدہ العبد

Attested & Accepted  
عبدالعزیز عالمی  
محمد آصف عرفان الہمدانی  
محمد آصف عرفان الہمدانی  
محمد آصف عرفان الہمدانی