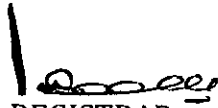





Form-A
FORM OF ORDERSHEET

Court of _____

Case No. 609/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
<p>1</p> <p>2-</p> <p>25.05.2018</p> <p>12.07.2018</p>	<p>04/05/2018</p> <p>15/05/18.</p>	<p>The appeal of Mr. Shamshi Khan presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>25/05/18.</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Counsel for the appellant present and seeks adjournment. Adjourned. To come up for preliminary hearing on 12.07.2018 before S.B.</p> <p style="text-align: right;"> (Muhammad Amin Khan Kundi) Member</p> <p>Clerk of the counsel for appellant present. Preliminary arguments could not be heard due to killing of a lawyer Barrister Haroon Bilour in a suicide attack during the election campaign. To come up for preliminary hearing on <u>02.08.2018</u> before S.B.</p> <p style="text-align: right;"> Chairman</p>

02.08.2018

Neither the appellant nor his counsel present, however, Mr. Kamran Khan, Advocate put appearance on behalf of learned counsel for the appellant and made a request for adjournment. Granted. Case to come up for preliminary hearing on 07.09.2018 before S.B at camp court Swat.


Chairman

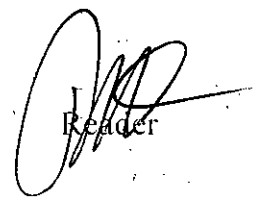
07.09.2018

Clerk to counsel for the appellant present and made a request for adjournment. Granted. Case to come up for preliminary hearing on 09.11.2018 before S.B at camp court Swat.


Chairman
Camp Court Swat


09.11.2018

Due to retirement of the Hon'ble Chairman Service Tribunal is incomplete. Tour to Camp Court Swat has been cancelled. To come up for the same on 11.01.2019 at camp court Swat.


Reader

11.01.2019

Appellant alongwith his counsel present and requested for adjournment. Adjourned. To come up for preliminary hearing on 08.03.2019 before S.B at Camp Court Swat.


(Muhammad Amin Khan Kundi)
Member
Camp Court Swat

609/2018

08.03.2019

Counsel for the appellant present.

Learned counsel for the appellant stated that the appellant has been promoted and he is under instructions to withdraw instant appeal with permission to file a fresh one in case any portion of grievance of appellant remained un-redressed through the promotion order.

Dismissed as withdrawn. File be consigned to the record room.



Chairman
Camp Court, Swat

ANNOUNCED
08.03.2019

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. 609 /2018

Shamshi Khan

...Appellant

VERSUS

The secretary of (E&SE) Department, Khyber Pakhtunkhwa, Peshawar &
Others

... Respondents

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Appellant


Shamshi Khan

BEFORE THE SERVICE TRIBUNAL KHYBER

PAKHTUNKHWA, PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No 609 /2018

Diary No. 656

Dated 04-5-2018

Shamshi Khan A.T (BPS-15) Teacher G.H.S Matiltan, Tehsil Kalam

District Swat.

.....Appellant

VERSUS

1. The secretary of (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (M) District Swat.

.....Respondents

APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT

1974 READ WITH ANY OTHER RELEVANT PROVISIONS

AGAINST THE IMPUGNED ORDER DATED: 24/02/2013

WHEREAS THE APPELLANT HAS BEEN IGNORED FROM

PROMOTION TO THE POST OF SENIOR ARABIC TEACHER

(BPS-16) PASSED BY RESPONDENT NO.3.

PRAYER:

Filed to-day

Registrar

4/5/18

(9)

ON ACCEPTANCE OF THIS SERVICE APPEAL THE
IMPUGNED ORDER PASSED BY RESPONDENT NO.3
DATED: 27/02/2013 MAY KINDLY BE MODIFIED, AND
THE APPELLANT MAY KINDLY BE CONSIDERED FOR THE
SAID PROMOTION WITH ALL SERVICE BENEFITS AS
PRAYED.

ANY OTHER RELIEF, DEEMED FIT IN THE CIRCUMSTANCES
MAY ALSO BE AWARDED IN FAVOR OF APPELLANT
AGAINST RESPONDENTS.

Respectfully Sheweth:

The appellant submits as under;

1. **That** the appellant is the permanent resident of
Matiltan, Tehsil Kalam District Swat.
2. **That** the appellant have got the certificates of Molvi
Fazil from the Government, Borad of intermediate and

(2)

Secondary Education Peshawar.. (Copies of testimonials are attached as Annexure "A")

3. *That being qualified from Government Dar ul uloom Islamia Charbagh Swat and Parhoti Mardan, the appellant on the basis of certificates from the above institutions, the appellant was appointed as Arabic Teacher (BPS-09) vide order dated 27/02/1988 and since then the appellant has performed his duties quit efficiently, honestly and to the entire satisfaction of superior officer / respondents. (Copy of the order dated 27/02/1988 is attached as Annexure "B")*

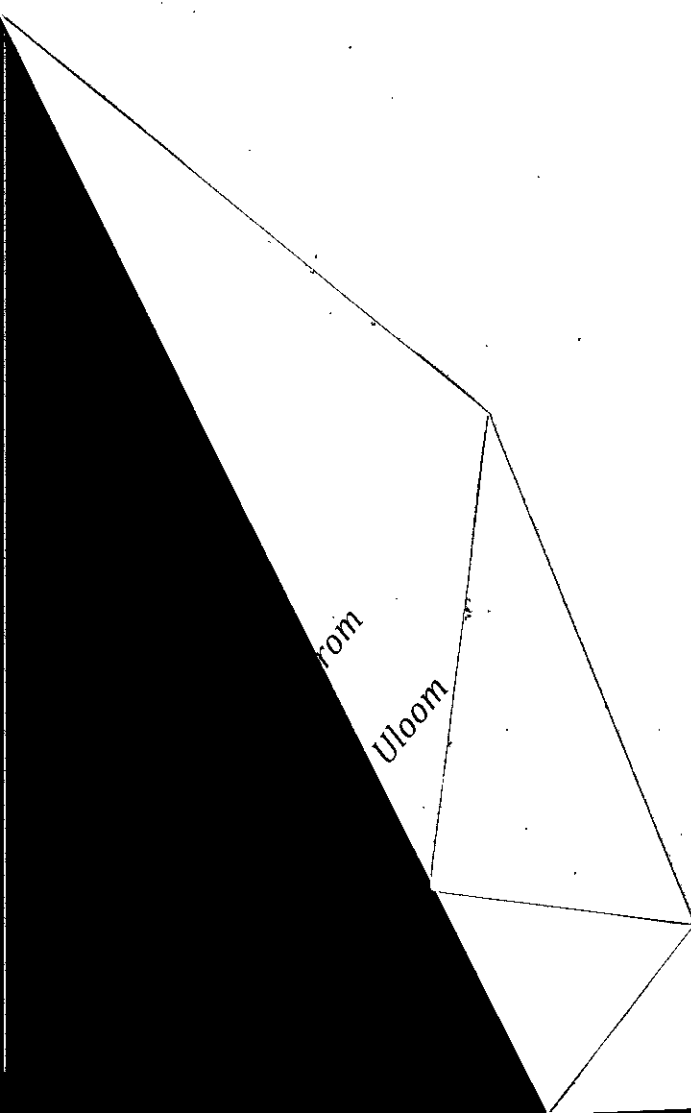
4. *That vide order dated 02/03/1998 the appellant was awarded BPS-14 on account of acquiring the degree of Shahadat Ul Alamia. (Copy of the Shahadat Ul Alamia is attached as Annexure "C")*

5. *That later on vide notification dated 11/07/2012 the post of appellant was upgraded to BPS-15 by the*



Respondents. (Copy of Notification is attached as Annexure "D")

6. *That according to seniority list of A.T teachers of the district Swat the appellant was placed at S.NO 51 of the seniority list dated 31/07/2012. (Copy of Seniority list is attached as Annexure "E")*
7. *That on the above mentioned seniority list the appellant name was sent by the respondent No 3 to respondent No 2 for promotion to BPS-16 having senior most employee.*
8. *That vide order dated 27-02-2013 the respondent No 2 promoted the Senior most A.T's of District Swat to BPS-16 but the appellant was astonished when he did not seen his name in the same promotion order of A.T's despite having eligibility and seniority. (Copies of orders are attached as Annexure "F & G")*
9. *That the appellant has the higher qualification from the recognized Madrsa's, Government Dar Ul*



Charbagh District Swat, Parhoti Mardan and also more than 30 years' service at his credit and having eligibility for promotion to **BPS-16** but inspite of that the respondents have ignored the appellant from promotion to **BPS-16** without any reason and justification. **(Copy of the recognition certificate is attached as Annexure "H")**

10. **That** feeling aggrieved the appellant filed Departmental appeal before the respondent No 3 but no reply has been received so far, hence the present appeal on the following grounds amongst others. **(Copy of the Departmental appeal is attached as Annexure "I").**

11. **That** feeling aggrieved the appellant filed appeal in the Kyber Pakhtunkhwa Service Tribunal Peshawar which was dismissed vide order dated 07/11/2016. **(Copies of the appeal and order dated 07/11/2016 are attached as Annexure "J & K")**

(b)

12. **That** feeling aggrieved and having no other adequate remedy the appellant filed **CPLA No 66/2017** in the supreme court of Pakistan. The same petition was withdrawn vide order dated **24/01/2018** for availing another remedy because the appellant has claimed his promotion on the basis of certificate from a Madrasa situated at Parhoti Mardan and inadvertently have not claimed his promotion on the basis of certificate (Shahadat-ul-Alamia) from a Government recognized institution namely Dar ul uloom Islamia Charbagh District Swat with 1st division and second division of matric from board of Peshawar. **(Copies of the CPLA and order dated 24/01/2018 are attached as Annexure "L & M")**.

13. That the appellant again filled another departmental appeal before respondent No 3 on the basis of certificate (Shahadat-ul-Alamia) from a Government recognized institution namely Dar ul uloom Islamia Charbagh District Swat with 1st division and second

(7) (8)

division of matric from board of Peshawar. which has not been decided yet. **(Copy of departmental appeal is attached as Annexure "N".)**

14. That the Government Dar-ul-uloom Charbagh Swat is registered with the Education department from 1945 for the post of AT & TT. (Copy of Ijmali list is attached as Annexure "O")

15. That in the year 2012 the Provincial Government has issued a notification dated 03.04.2012 through which it is crystal clear that the above Dar -ul- uloom Charbagh Swat is registered and recognized with Education department for promotion and appointment. (Copy of notification is attached as Annexure "P")

16. That in the light of the above mentioned order of the Supreme Court of Pakistan dated 24/01/2018 the appellant is going to file the instant appeal inter alia on the following grounds.

GROUNDS:

- i) **That** the impugned order of respondent No 3 is against law, facts, material available on record. Hence liable to be set aside.

- ii) **That** the appellant is well qualified and full filling the required qualification as well as criteria for promotion.

- iii) **That** the appellant has not been treated equally and in accordance with the constitution of the Islamic Republic of Pakistan 1973.

- iv) **That** not promoting the appellant to **BPS16** by the respondents despite of having eligibility and seniority is against the law, facts, illegal, unlawful, unconstitutional, and base on mala-fide and norms of natural justice.

- v) **That** the appellant has not been treated in accordance with law and rules on the

subject noted above and such the respondent violated Article 4 and 25 of constitution of Pakistan 1973.

vi) **That** the respondents acted in arbitrary and malafide manner by not promoting the appellant to the post of the Senior Arabic Teacher **BPS-16**.

vii) **That** under the one third formula the appellant is entitled to be promoted for the post of SAT (**BPS-16**) having seniority at serial **No 51** of the seniority list of A.T in District Swat.

viii) **That** many colleagues and juniors colleagues of the appellant have been promoted to the post SAT (**BPS-16**) but the appellant has been ignored on the reasons best known to the respondents.

ix) **That** despite of more than 30 years of clean and neat service of the appellant was ignored for the promotion of SAT (BPS-16) which is not tenable under the law and the constitution of Pakistan as prevailing rules.

x) **That** the impugned order has been passed in violation of Khyber Pakhtunkhwa Efficiency and Discipline Rules 1973, (Amended in 2011).

xi) **That** the appellant has not been dealt with in accordance with law and rules regulating service of the appellant.

xii) **That** the entire proceeding has been conducted in derogation of law and rules.

xiii) **That** the appellant being the only bread earner of his family, the entire family has been curbed vide impugned orders.

(11) (12)

xiv) **That** the impugned order of respondents is whimsical, capricious and founded on surmises and conjectures.

xv) **That** the impugned order given by the Respondents to the appellant is violation of the articles 4, 9 and 25 of the constitution of the Islamic Republic of Pakistan, 1973.

xvi) **That** other grounds not specifically raised will be argued with the prior permission of this Honorable Court at the time of arguments.

It is therefore humbly prayed that on acceptance of this appeal, the impugned order dated 27/02/2013 passed by respondent No 3 may kindly be modified to the extent of appellant and the respondents may kindly be directed to consider the appellant for promotion to the post of

Senior Arabic Teacher with all back and consequential benefits.

Any other remedy which is just, appropriate and efficacious may also be awarded in favor of the appellant please.

Appellant



Shamshi Khan



BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. _____/2018

Shamshi Khan

.....Appellant

VERSUS

The secretary of (E&SE) Department, Khyber Pakhtunkhwa, Peshawar &

Others.

..... Respondents

AFFIDAVIT

I, Shamshi Khan S/o Guldidar R/o Matiltan, Tehsil Kalam District Swat, do hereby solemnly affirm and declare on oath that all the contents of this Service Appeal are true and correct to the best of my knowledge and belief, and nothing has been concealed from this Honorable Court.

DEPONENT

Shamshi Khan

In person

(14)

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. _____/2018

Shamshi Khan

...Appellant

VERSUS

The secretary of (E&SE) Department, Khyber Pakhtunkhwa, Peshawar &
Others

... Respondents

ADDRESSES OF THE PARTIES

ADDRESS OF THE APPELLANT

Shamshi Khan A.T (BPS-15) Teacher G.M.S Matiltan, Tehsil Kalam

District Swat.

CNIC: 15602-0462649-3

Cell: 03489603805

ADDRESSES OF THE RESPONDENTS:

1. The secretary of (E&SE) Department, Khyber Pakhtunkhwa,
Peshawar.
2. Director Elementary & Secondary Education Department Khyber
Pakhtunkhwa, Peshawar.
3. The District Education Officer (M) District Swat.

APPELLANT


Shamshi Khan

S. No. 0465911

Roll No. -20976



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan
Secondary School Certificate Examination
SESSION 1984 (ANNUAL)

THIS IS TO CERTIFY THAT Shamshā Khan

Son/Daughter of Gul Didar

and a student of Govt : High School, Fatehpur, Swat.

has passed the *Secondary School Certificate Examination*
of the Board of Intermediate and Secondary Education, Peshawar held in April 1984
as a *Regular candidate*. He/She obtained 412 Marks out of 850

and has been placed in Grade D Representing Fair

The Candidate passed in the following subjects:

1. English
2. Urdu
3. Islamiyat
4. Gen Science
5. Pak Studies
6. Isl Studies
7. Gen Mathematics
8. Pashto

He/She has been awarded Grade C on the basis of internal
assessment by the Institution concerned.

Date of birth according to admission form is Second March
one thousand nine hundred and Sixty Eight. (2-3-1068)

Asstt. Secretary

9th August 1984

This certificate is issued without alteration or erasure.

Secretary

s. No 9018307

پشاور

Roll No. 362

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan

Honours Examination

SESSION 1987

THIS IS TO CERTIFY THAT Shamsh Khan

Son of Gul Didar

and a resident of Swat District

has passed the HONOURS in Arabic

Examination of the Board of Intermediate & Secondary Education, Peshawar

held in July, 1987 in the Second Division

Registered No. 276-B/AR-87

Asstt. Secretary

Secretary

This certificate is issued without alteration or erasure.

B- (17)

OFFICE OF THE DIRECTOR OF EDUCATION (MALAKAND DIVISION SAIDU SHARIF.

1 APPOINTMENT.

Mr. Shamshi Khan (Honours in arabic) S/O Gul Dider resident of Village Matiltan District Swat is hereby temporarily appointed against vacant A.T. post at GHS. Baz Dara (Mikd: Agency) in EPS-No. 9 @ Rs. 810-32/P.M. plus usual allowances as admissible to him under the rules with effect from the date of his taking over charge in the interest of public service subject to the following terms & conditions:-

TERMS & CONDITIONS:-

- 1- No T.A./D.A. is allowed.
- 2- Charge report-s should be submitted to all concerned.
- 3- The appointment is made purely on temporary basis and subject to termination at any time without notice & assigning any reason. In case of resignation, he shall have to submit one month's prior notice to the Deptt: or forfeit one month's pay in lieu thereof to the Government.
- 4- He should produce his health & age certificates from the Civil surgeon concerned.
- 5- The Head of the Institution is required to check his academic/professional certificates before handing over charge to the Candidate concerned.
- 6- He should not be handed over charge if his age exceeds 33 year or below 18 years.
- 7- If the Candidate failed to take over charge within 15 days of the Issue of this order, his appointment shall stand automatically cancelled.

(H. Abdur Rashid Khan)
DIRECTOR OF EDUCATION,
MALAKAND DIVISION
SAIDU SHARIF, SWAT.

Endst: No. 3753-55 / A-3/A.T.

Dated 27/9 / 1989.

Copy forwarded to :-

- 1- Distt: Edu: Officer (M) Malakand Agency swt.
- 2- H/Master, GHS. Bazdara (Mikd: Agency) is required to sent the professional/academic certificates to the concern Institution for verification.
- 3- Candidate concerned.

for/

Ma
D.P.M.
DIRECTOR OF EDUCATION,
MALAKAND DIVISION
SAIDU SHARIF, SWAT.

Taj Mohammad/

OFFICE OF THE DIRECTOR OF EDUCATION (S) MLKS: DIVISION SAIDU SHARIF, SWAT.

CORRIGENDUM:-

Please read OMS: Mankayal Distt: Swat instead of GHS: Bazardara Malakand Agency against the name of Mr. Shamsul Khan (H. in arabic) S/o Gul Uddin of this office appointment order issued under Endst: No. 3753-55/A-3/A.T. dated 27-2-1988.

(H. Abdur Rashid Khan)
DIRECTOR OF EDUCATION,
MALAKAND DIVISION
SAIDU SHARIF, SWAT.

Endst: No. 4959-5007/A-3/A.T

Dated. 29/3 / 1988.

Copy forwarded to:-

- 1.2) The Distt: Education Officer (M) Swat & Malakand Agency.
- 3.4) The N/M GHS: Bazardara Malakand Agency & OMS: Mankayal Distt: Swat.
5. The Sub: Divisional Education Officer (M) Matta Babozai Swat.

[Signature]
for DIRECTOR OF EDUCATION
MALAKAND DIVISION
SAIDU SHARIF, SWAT.

Amin Khan



دارالعلوم الاسلاميه الحكوميه چارباغ سوات باكستان

شهادة العالمية

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

19-C



الحمد لله الذي نور قلوبنا بكتابه المبين. والصلوة والسلام على رسوله محمد خاتم النبيين. وعلى اله ورضيه اجمعين.

وبعد فنشهد ان الاخ شمس خان بن گل دیوار من صُلْتَان كَالَام سوات

المولود عام 02-03-1968 هـ قد اتتم الدراسة النهائية في دارالعلوم الاسلاميه الحكوميه الواقعة في سيدو شريف من سوات

ونجح في الامتحان النهائي المنعقد في 1435 هـ بتقدير جيد جدا وقد حصل على 426 درجات من

مجموع 600 درجات بمعدل 71 % . وبذلك استحق الشهادة العالمية.

ونحن اذ نمنحه الشهادة نوصيه ان يتقى الله وان يبذل جهده في سبيل نشر العلوم الاسلاميه وخدمة الاسلام والمسلمين.

توقيع المدير

Countersigned

توقيع صدر المدرسين

امضاء اب المدرسين

رقم السلسه 70/014 ختم المدرسه

رقم الجلوس 130-C

تاريخ الاصدار 2014

Distt. Edu. Officer (M)
District Swat

گورنمنٹ دارالعلوم اسلاميه
چارباغ سوات



**GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

شاد کھنڈا ایس او ایس

Dated Peshawar, 11.07.2012

NOTIFICATION:

No. SO (B & A)/1-18/E&SE/2012:

Sanction of the Government of Khyber Pakhtunkhwa is hereby accorded to the up gradation of the posts for Grant of Incentive of High Pay Scale to different Categories/Cadres of teachers in Elementary & Secondary Education Department w.e.f. 01-07-2012 as per details given below:-

**Syed Sikandar Shah Bacha
PRESIDENT
Employees Copration Council
District Swat**

Sr. No.	Nomenclature of Teaching Post	Location	Existing Basic Pay Scale	New Approved Basic Pay Scale	Remarks
1.	Primary Teacher (PST)	Govt. Primary School	BPS-5 BPS-6 BPS-7 BPS-9 BPS-10 BPS-12	(BPS-12)	The post of PST is upgraded to BPS-12. Accordingly, 33,497 posts of PSTs already sanctioned in various pay scales are upgraded to BPS-12 for the present incumbents as well as future appointees.
2.	Senior Primary School Teacher (Sr. PST)	"do"	Newly Upgraded/ Redesignated Post	(BPS-14)	22,331 posts of the existing PSTs in various existing pay Scales are upgraded to BPS-14 and redesignated as Senior PST. The posts will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
3.	Primary School Head Teacher (PSHT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-15)	20,804 posts of the existing PST's (one post in each Primary School) are upgraded to BPS-15 and redesignated as Primary School Head Teacher, and will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
4.	Certified Teachers (CT)	Govt. Middle/High/Higher Secondary School	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of CTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
5.	Senior Certified Teachers (Sr. CT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total CT posts are upgraded to BPS-16 and redesignated as Senior CTs which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
6.	Arabic Teachers (A.T)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of ATs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
7.	Senior Arabic Teachers (Sr. AT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total AT posts are upgraded to BPS-16 and redesignated as Senior AT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
8.	Teacher of Theology (TT)	"do"	BS-07 BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of TTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
9.	Senior Teacher of Theology (Sr. T)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total TT posts are upgraded to BPS-16 and redesignated as Senior TT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
10.	Drawing Masters (DM)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of DMs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
11.	Senior Drawing Masters (Sr. DM)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total DM's posts are upgraded to BPS-16 and redesignated as Senior DM, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or

Shahid

57

تعارف و اطلاع دہانی

12.	Physical Education Teachers (PET's)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of PETs are upgraded to BPS-15 present incumbents to the post as well as future appointees.
13.	Senior Physical Education Teachers (Sr. PET's)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total PET's posts are upgraded to BPS-16 and redesignated as Senior PET, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, of the post.
14.	Qari/Qaria	"do"	BPS-7 BPS-9 BPS-10 BPS-12 BPS-14 BPS-15	(BPS-12)	All the existing posts of Qari/Qaria are upgraded to BPS-12 for the present incumbents to the post as well as future appointees.
15.	Sr.Qari/Sr.Qaria	"do"	Newly Upgraded/ Redesignated Post	(BPS-15)	One thirds (1/3 rd) of the total Qari/Qaria posts are upgraded to BPS-15 and redesignated as Senior Qari/Qaria, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.

- A policy shall also be devised in the framework of input/output criteria in terms of qualification, length of service, regularity, punctuality, results, curricular and co-curricular achievements and other performance indicators, so that the teachers do not take the scheme for granted but work for it.
- District wise/ school wise breakup of the posts is enclosed herewith as Annexure-A.

SECRETARY

Endst. No. SO(FR)/FD/10-22(E)/2010 Dated Pesh: the 16/07 2012

Copy is forwarded to Accountant General Khyber Pakhtunkhwa, Peshawar.
All District Account Officers.

صدر اعلیٰ کراچی
ایڈیشنل ڈائریکٹر سیکرٹریٹ

SECTION OFFICER (FR)
FINANCE DEPARTMENT

Endst. Of even Number & Date.

Copy of the above is forwarded to:

- The Secretary to Government of Khyber Pakhtunkhwa, Finance Department, with reference to his letter No SO(FR)/FD/10-22(E)/2010 dated 26.06.2012.
- P.S. to Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- P.S. to Special Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- P.S. to Deputy Secretary-II, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- P.S. to Minister of E&SE, Khyber Pakhtunkhwa.
- The Director, E&SE Khyber Pakhtunkhwa, Peshawar.
- All the Executive District Officers, E&SE Khyber Pakhtunkhwa.
- The Managing Director, Printing Press, Khyber Pakhtunkhwa, Peshawar.
- Master file.

Syed Yikandir Shah Bacha
PRESIDENT
in Teachers' Coordination Council
District Swat

Malak Khalid Khan
Govt. Primary Mocu. School
Nash. Bagh, Road, Peshawar
Mob. 0345-3159559

(NOOR ALAM KHAN WAZIR)
SECTION OFFICER (B&A)
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

24/07/2012
0333 9463633

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AT Comp.

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY & SECONDARY EDUCATION SWAT AT GULKADA.

TENTATIVE SENIORITY LIST OF AT DISTRICT SWAT CORRECTED UP TO 31/07/2012.

Sr. No	Sub	Name with academic and professional Qualification	Father's Name	Academic Qualification	Professional Qualification	Date of birth	Domicile	D/O of app't in Education Deptt	D/O of app't on the present post	Date of taking over charge in this District	Place of posting	Remarks
1	2	3	4	5	6	7	8	9	10	11	12	
1	3	Mian Noor Bacha	Said Bacha	MA Arbic	B.Ed/Shahdatul Alamia	01-12-82	SWAT	01-01-82	26-10-82	01-01-82	GHS No. 4 Mingora	
2	2	Samiul Haq	Gnulam Ahmad	MA Arbic	Shahdatul Alamia	03-01-57	SWAT	27-07-82	27-10-83	27-07-82	GHS Khwazakhela	
3	7	Sher Zaman	Mohammad Gulab	SSC	Shahdatul Alamia	09-10-53	SWAT	01-10-80	01-11-83	01-10-80	GHS Islampur	✓
4	5	Abdul Malik	Yar Muhammad Khan	SSC	Shahdatul Alamia	07-02-56	SWAT	27-07-82	01-11-83	27-07-82	GHS Jambil	
5	5	Muhamamad Tahir	Abdul Karim	SSC	Shahdatul Alamia	04-09-51	SWAT	05-07-79	01-11-83	05-07-79	GHS Cruprial	✓
6	9	Gul Bacha	Fazal Rahman	SSC	Shahdatul Alamia	31-12-54	SWAT	15-12-83	15-12-83	15-12-83	GHSS Kalam	
7	10	Abdul Qana	Muhammad Zaman	SSC	Shahdatul Alamia	29-2-55	SWAT	29-02-84	29-02-84	29-02-84	GHS Painday	
8	11	Wazir Muhammad	Abdul Majd	SSC	Shahdatul Alamia	04-10-56	SWAT	04-10-82	11-11-84	04-10-82	GHS Nawagai	
9	12	Azizullah	Munammad Sherin	SSC	Shahdatul Alamia	01-04-62	SWAT	14-11-84	14-11-84	14-11-84	GHS Sankh	Sheifalena 03
10	13	Fazal Mabood	Shafiqullah	SSC	Shahdatul Alamia	01-04-59	SWAT	03-03-83	15-11-84	03-03-83	GHS Gulibagh	
11	14	Irfanud Din	Ghani Gul	SSC	Shahdatul Alamia	01-02-50	SWAT	26-10-74	24-11-84	26-10-74	GHS Labat	✓
12	15	Abdur Aziz	Muhammad Qasim	SSC	Shahdatul Alamia	23-03-56	SWAT	25-03-84	16-12-84	25-03-84	GHS Beha	
13	16	Abdur Rahim	Babo Jan	SSC	Shahdatul Alamia	21-01-56	SWAT	10-01-85	10-01-85	10-01-85	GHS Dunshkhela	
14	17	Abdus Seboor	Ghulam Ahmad	SSC	Shahdatul Alamia	01-01-53	SWAT	17-03-79	23-01-85	17-03-79	GHS Shaipin	✓
15	18	Ibrahim	Muhammad Israil	BA	Shahdatul Alamia	01-01-58	SWAT	31-01-85	31-01-85	31-01-85	GHS No-3 Mingora	
16	19	Ghulamullah Shah	Said Jillani	MA	Shahdatul Alamia	01-01-58	SWAT	11-03-85	11-03-85	11-03-85	GHS No.1 Mingora	
17	21	Q.M. Mubarik	Arifullah	SSC	Shahdatul Alamia	20-05-55	SWAT	16-05-85	16-05-85	16-05-85	GMS Damana	
18	22	Irfanud Din	D.M. Khan	MA/ARBI	Shahdatul Alamia	30-08-63	SWAT	18-05-85	18-05-85	18-05-85	GHS No.3 Mingora	
19	23	Mian Hussain Shah	Muhammad G Hussain	SSC	Shahdatul Alamia	04-07-58	SWAT	04-07-85	04-07-85	04-07-85	GMS Pochar	
20	24	Muhammad Ali	S.Alam Khan	SSC	Shahdatul Alamia	11-02-54	SWAT	19-08-85	19-08-85	19-08-85	GMS Bishbar	GHS Mans Court
21	27	Muhammad Nabi	Abdul Manan	SSC	Shahdatul Alamia	18-09-60	SWAT	01-10-85	01-10-85	01-10-85	GMS Dabergay	
22	26	Abdur Raziq	Talimand	SSC	Shahdatul Alamia	20-05-63	SWAT	11-03-85	01-10-85	11-03-85	GMS Manpetai	
23	29	Inayatullah	Abdur Rasool	BA	Shahdatul Alamia	16-06-56	SWAT	12-04-75	26-10-85	12-04-75	GHS Shahdherai	
24	31	Bahramand	Hazrat Umar	MA/ARBI	Shahdatul Alamia	21-04-64	SWAT	06-11-85	06-11-85	06-11-85	GHS Bahrain	
25	32	Becha Gul	Fazal Hanan	SSC	Shahdatul Alamia	21-11-55	SWAT	12-11-85	12-11-85	12-11-85	GMS Galoch	
26	33	Taqwemul Haq	Hazrat Bilal	SSC	Shahdatul Alamia	06-03-55	SWAT	17-01-85	17-01-85	17-01-85	GHS Manglor	
27	34	Muhamamad Hilal	Hazrat Bilal	SSC	Shahdatul Alamia	07-01-56	SWAT	07-01-85	01-01-86	07-01-85	GMS Gary	
28	36	Abdul Wahab	Abdul Akram	SSC	Shahdatul Alamia	05-03-56	SWAT	23-02-86	23-02-86	23-02-86	GMS Talang	
29	37	Abdur Rahman	Muhammad Israil	SSC	Shahdatul Alamia	05-02-57	SWAT	15-03-82	15-03-86	15-03-86	GHS Derai	
30	38	Abdul Ahd	Muhammad Ali	SSC	Shahdatul Alamia	01-01-55	SWAT	19-03-86	19-03-86	19-03-86	GHS Khwazakhela	
31	40	Muhammad Sherin	Fazal Mughammad	SSC	Shahdatul Alamia	27-11-57	SWAT	01-11-86	23-11-86	01-11-86	GHS Mingora	
32	39	Muhammad Saleh	Sham Haidar	SSC	Shahdatul Alamia	01-01-59	SWAT	16-01-85	23-11-86	16-01-85	GHS Swegafai	
33	41	Habib Ahmad	Ghazi Gul	SSC	Shahdatul Alamia	04-02-67	SWAT	23-11-86	23-11-86	23-11-86	GHS Topsisin	
34	43	Rafiq Ahmad	Noor Huda	MA/ARBI	Shahdatul Alamia	02-05-51	SWAT	26-11-86	26-11-86	26-11-86	GHS Totano Bandai	

Mentul Ahmad, Nadeem Khan, J.A., S. Alami, 16/3/86, 28/2/89, 28/2/10, 28/2/10, GMS Chagata

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Sr.No	Sub	Name with academic and professional Qualification	Father's Name	Academic Qualification	Professional Qualification	Date of birth	Domicile	D/O of Ist. Education Deptt.	D/O of apptt. on the present post	Date of taking over charge in this District	Place of posting	Remarks
35	44	Ahmad Hussain	Ghazi Gul	SSC	Shahdatul Alamia ✓	02-01-62	SWAT	27-11-86	27-11-86	27-11-86	GHS Khazana ✓	
36	45	Abdur Rahman	Per Saïd	SSC	Shahdatul Alamia	01-12-64	SWAT	27-11-86	27-11-86	27-11-86	GHS Amankot	
37	46	Azizur Rahim	Shér Dil	SSC	Shahdatul Alamia	17-05-58	SWAT	29-11-86	29-11-86	29-11-86	GHS Chamatalai	
38	48	Abdul Mubin	Abdul Jalli	SSC	Shahdatul Alamia	03-05-61	SWAT	01-12-86	01-12-86	01-12-86	GHS Baidara	
39	52	Muhammad Qasim	Abdur Rahman	MA/ARBI	Shahdatul Alamia	03-09-56	SWAT	01-09-84	11-12-86	01-09-84	GMS Toha	
40	53	Sher Bahadar	Qasim Jan	SSC	Shahdatul Azmia	08-02-56	SWAT	15-12-86	15-12-86	15-12-86	GMS Lakhar	
41	54	Muhammad Karim	Muhammad Rahin	MA	Shahdatul Alamia	15-04-63	SWAT	18-02-87	18-02-87	18-02-87	GHS Sigram	
42	55	Muhsin Ali	Menjawar	SSC	Shahdatul Alamia	28-03-56	SWAT	28-03-87	28-03-87	28-03-87	GHS Dakorak	
43	57	Muhammad Naeem	Hazrat Umar	SSC	Shahdatul Alamia	18-06-60	SWAT	04-11-86	04-11-86	04-11-86	GHS Gwajerai	
44	58	Zainul Abid Din	Sherdad Khan	SSC	Shahdatul Alamia	01-07-57	SWAT	26-09-87	26-09-87	26-09-87	GMS Dargam	
45	59	Merzâ Ghaib	Muhammad Zarin	MA/ARBI	Shahdatul Alamia	01-01-67	SWAT	29-09-87	27-09-87	29-09-87	GHS Uter Abc. Ha.	
46	60	Muhammad Ishaq	Abdul Haleem	SSC	Shahdatul Alamia	04-04-64	SWAT	29-10-87	29-10-87	29-10-87	GMS Ser	
47	61	Sultan Mohammad	Alimand	MA	E.Ed/Shahdatul Alamia	12-04-66	SWAT	29-10-87	29-10-87	29-10-87	GHSS Charbagh	
48	62	Bashir Ahmad	Abdul Matin	SSC	Shahdatul Alamia	03-02-61	SWAT	16-11-87	16-11-87	16-11-87	GHS Nazar Abad	
49	63	Said Jawhar	Said Jamil Samad	SSC/MA	Shahdatul Alamia ✓	12-05-65	SWAT	28-01-88	28-01-88	28-01-88	GMS Peetra GHS Asala	
50	64	Inayatullah Rahman	Muhammad Bashir	SSC	Shahdatul Alamia	02-04-65	SWAT	03-03-88	03-03-88	03-03-88	GMS Aligrama	
51	65	Shamshi Khan	Gul Dilar	SSC ✓	Shahdatul Alamia ✓	02-03-68	SWAT	01-04-88	01-04-88	01-04-88	GHS Matiltan ✓	
52	66	Muhammad Din	Muhammad Faqir	MA/ARBI	Shahdatul Alamia	25-12-63	SWAT	10-04-88	10-04-88	10-04-88	GMS Ayeen	
53	67	Hussain Ahmad	Muhammad Shuaib	MA/BED	BED/Shahdatul Alamia	01-04-70	SWAT	22-11-88	22-11-88	22-11-88	GMS Sangota	
54	68	Muzicud Din	Abdul Jalli	SSC	Shahdatul Alamia	28-08-59	SWAT	01-09-89	01-09-89	01-09-89	GMS Dagay	
55	69	Fazal Hakim	Husnul Maab	MA/ARBI	Shahdatul Alamia/BED	12-04-68	SWAT	24-09-89	24-09-89	24-09-89	GMS Panr	
56	70	Samiul Haq	Gul Nabi	SSC ✓	Shahdatul Alamia ✓	13-03-64	SWAT ✓	01-10-89	01-10-89	01-10-89	GMS Mahek Sano	
57	71	Rahman Ali	Aminullah	SSC	Shahdatul Alamia	01-05-65	SWAT	01-10-89	01-10-89	01-10-89	GMS Jehan Abad	
58	72	Abdur Rahman	Ahmad Shafi	MA/ARBI	E.Ed/Shahdatul Alamia	03-04-69	SWAT	20-01-90	20-01-90	20-01-90	GMS Charbagh	
59	73	Shahzada	Syed Jailani	FA	Shahdatul Alamia	2.04.1967	SWAT	18-02-90	16-02-90	18-02-90	GHSS Barikot	
60	74	Noorul Wahid	Fazal Wahid	MA	Shahdatul Alamia	05-04-71	SWAT	04-03-90	04-03-90	04-03-90	GHS Kishawra	
61	75	Hafizur Rahman	Saifur Rahman	SSC	Shahdatul Alamia	04-02-59	SWAT	05-03-90	05-03-90	05-03-90	GHS Miandam	
62	76	Aziz Ahmad	Arfanud Din	SSC	Shahdatul Alamia	13-06-64	SWAT	05-03-90	05-03-90	05-03-90	GMS Torogay	
63	77	Midrarullah	Ahmad Nawab	SSC/MA	Shahdatul Alamia	01-03-69	SWAT	05-03-90	05-03-90	05-03-90	GHS Daroyal Am Gulocech	
64	78	Ahmad Hussain	Gul Bar	SSC ✓	Shahdatul Alamia	24-06-69	SWAT	11-04-90	11-04-90	11-04-90	GHS Shalhand	
65	1	Abdul Hassan	Sakhi Muhammad	SSC	Shahdatul Alamia	15-03-53	SWAT	26-06-82	01-08-90	26-06-82	GHS Shagai	
66	79	Muhammad Naeem	Muhammad Akbar	SSC	Shahdatul Alamia	07-06-68	SWAT	01-08-90	01-08-90	01-08-90	GHS Kabalkoo	
67	80	Snah Hussain	Muhammad Amin	MA Arbic	Shahdatul Alamia	10-04-68	SWAT	06-08-90	06-08-90	06-08-90	GMS Dhero	
68	81	Abdur Rahim	Israil	SSC	Shahdatul Alamia	13-03-71	SWAT	24-09-92	24-09-90	24-09-92	GMS Shakardara	
69	82	Rafiullah	Abdullah	SSC	Shahdatul Alamia	18-01-56	SWAT	18-01-82	01-05-91	16-01-82	GMS bashigram	
70	83	Muhammad Karim	Muhammad Rahim	SSC	Shahdatul Alamia	15-04-63	SWAT	18-02-87	28-02-87	18-02-87	GMS Samakhela S. J. Ram	
71	84	Bakht Ambar	Muhammad Afzal	SSC	Shahdatul Alamia	27-09-63	SWAT	11-05-92	11-05-92	11-05-92	GHS Gurnai	
72	86	Fazal Maula	Ahmad G	MA/ARBI	Shahdatul Alamia	13-11-52	SWAT	03-03-82	12-05-92	03-03-82	GHS Tindodag	
73	87	Ihtishamul Haq	Gul Rahman	SSC	Shahdatul Alamia	09-01-53	SWAT	12-05-92	12-05-92	12-05-92	GHS Kanju	

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Sr. No	Sub	Name with academic and professional Qualification	Father's Name	Academic Qualification	Professional Qualification	Date of birth	Domicile	D/O of 1st Appt in Education Deptt	D/O of appt. on the present post	Date of taking over charge in this District	Place of posting	Remarks
74	85	Abdullah	Tallmand	SSC MA	Shahdatul Alamia	11-11-60	SWAT	29-12-81	12-05-92	29-12-81	GMS Chemgerai	Perma
75	86	Latifullah	Abdur Raof	MA/ARBI	Shahdatul Alamia	01-09-61	SWAT	12-05-92	12-05-92	12-05-92	GHS Qambar	
76	89	Shah Wali	Ajab Khan	EA	Shahdatul Alamia	10-01-68	SWAT	12-05-92	12-05-92	12-05-92	GMS Meragai	
77	90	Abdullah Jan	Amir Rahman	SSC B.A	Shahdatul Alamia	02-04-67	SWAT	15-01-91	13-05-92	15-01-91	GMS Sapal Bandai	Madguzel
78	91	Muhammad Yousaf H.	Musa Khan	SSC	Shahdatul Alamia	30-12-63	SWAT	16-05-92	16-05-92	16-05-92	GMS Matta	
79	92	Fazal Khaliq	Muhammad Shakirul Islama	SSC	Shahdatul Alamia	05-01-58	SWAT	23-05-92	23-05-92	23-05-92	GMS Ramit	
80	93	Nawab Ali Khan	Sardar Khan	SSC	Shahdatul Alamia	10-03-63	SWAT	24-05-92	24-05-92	24-05-92	GHS Bandai	
81	94	Abdur Razaq	Abdul Qadoos	MA	Shahdatul Alamia	01-04-66	SWAT	06-08-84	01-06-92	08-08-84		
82	95	Saeedullah	A.Zahir Shah	SSC	Shahdatul Alamia	21-02-72	SWAT	27-06-92	27-06-92	27-06-92	GMS Goda	
83	96	Miftahud Din	Qarib Ahmad	SSC	Shahdatul Alamia	06-02-59	SWAT	01-01-86	01-10-92	01-01-86	GHSS Fathepur	
84	97	Said Muhammad	Mian Said Jalal	MA/BED	BED/Shahdatul Alamia	01-03-66	SWAT	11-04-93	11-04-93	11-04-93	GMS Sambat	
85	98	Farooq Shan	Musa Muhammad	SSC MA/BA	Shahdatul Alamia	02-03-69	SWAT	12-05-92	12-04-93	12-05-92	GMS Gheke Banda	Dacelworg
86	99	Matiullah	Shebar Khan	MA	Shahdatul Alamia	14-02-67	SWAT	17-04-93	17-04-93	17-04-93	GMS Sar Banda	
87	100	Khurshid Ali	Shah Jehan	MA Arbic	Shahdatul Alamia/BED	04-05-64	SWAT	26-07-83	29-04-93	26-07-83	GMS Deolai	
88	101	FAZLI AZIM	Abdul Ghani M.A. U.S.A	SSC	Shahdatul Alamia	24-01-67	SWAT	29-04-83	29-04-93	29-04-83	GMS Lakoo G.H.S - SHIN	
89	49	Abdur Rauf	Maniawar	SSC	Shahdatul Alamia	21-01-55	SWAT	13-03-84	01-12-86	13-03-84	GHS Dermai	Transfer from oth.
90	102	Fazal Raziq	Fazal Ahad	SSC MALAY HANIBEL	Shahdatul Alamia	20-04-69	SWAT	01-11-94	01-11-94	01-11-94	GHS Para Sama	Siasinai SWAT
91	103	Abdul Shakoor	Ghulam Ahad	SSC	Shahdatul Alamia	01-12-53	SWAT	23-11-82	14-11-94	23-11-82	GHS Chikolai	
92	104	Riaz Ahmad Khan	Aman Khan	SSC	Shahdatul Alamia	02-04-69	SWAT	14-11-94	14-11-94	14-11-94	GMS Torwal	
93	105	Amir Zade y	Zarin	SSC BALDAR	Shahdatul Alamia	05-03-70	SWAT	14-11-94	14-11-94	14-11-94	GHS Laikot	
94	106	Habibullah	Khaista Muhammad	SSC	Shahdatul Alamia	06-04-70	SWAT	14-11-94	14-11-94	14-11-94	GMS Darolai	
95	108	Muhammad Ghani	Gul Zarin	SSC	Shahdatul Alamia	12.05.197	SWAT	14-11-94	14-11-94	14-11-94	GMS Bishbanr	
96	109	Abdul Qayoom	Abdul Khaliq	SSC	Shahdatul Alamia	10-05-68	SWAT	15-11-94	15-11-94	15-11-94	GHS Shawar	
97	110	Muhammad Yousaf	Musa Khan	SSC MA-VI	Shahdatul Alamia	05-05-70	SWAT	15-11-94	15-11-94	15-11-94	GMS Jalband	
98	111	Abdul Wadood	Abdul Haq	SSC	Shahdatul Alamia	01-03-72	SWAT	15-11-94	15-11-94	15-11-94	GHS Wedudla Saidu	
99	107	Inamur Rahman	HAMIDUR RAHMAN	MA/ARBI	Shahdatul Alamia	01-04-69	SWAT	17-11-94	17-11-94	17-11-94	GHS Shamozi	
100	114	Rohul Amin	MUHAMMAD	MA/SLAMIAT	Shahdatul Alamia	18-04-69	SWAT	10-05-92	17-11-94	14-05-92	GHSS Shamozi	
101	112	Muhammad Zahid	Gulfi Sadbar	SSC	Shahdatul Alamia	05-04-59	SWAT	22-11-94	22-11-94	22-11-94	GHS Kidam	
102	113	Rahmat Ali	Sarfraz Khan	SSC	Shahdatul Alamia	01-02-70	SWAT	23-11-94	23-11-94	23-11-94	GHS Jano	
103	115	Muhammad Ishaq	Mian Gul Zada	SSC	Shahdatul Alamia	10-02-60	SWAT	16-05-92	02-12-94	16-05-92	GMS Tall	
104	116	Fazal Hadi	Painda Gul	SSC	Shahdatul Alamia	18-12-71	SWAT	18-12-94	18-12-94	18-12-94	GMS Areen	
105	117	Fazal Rabi	Ajmai Khan	BA	Shahdatul Alamia/BED	03-08-66	SWAT	20-12-94	20-12-94	20-12-94	GMS Chanchary	
106	119	Muhammad Salhud Din	Muhammad Roshan	MA/ARBI	Shahdatul Alamia	05-03-70	SWAT	17-01-95	17-01-95	17-01-95	GHS Kokarai	
107	121	Hanifur Rahman	Muhammad Khan	MA Arbic	Shahdatul Alamia	03-05-70	SWAT	20-05-95	20-05-95	20-05-95	GHS A/Dherai	
108	122	Iqbal Rashid	Rahim Dad	MA Arbic	B.Ed/Shahdatul Alamia	10-01-67	SWAT	21-03-96	21-03-96	21-03-96	GHS Ghalegay	
109	123	Bakhti Rawan	Shah Izat Khan	SSC	Shahdatul Alamia	05-05-65	SWAT	07-03-96	07-03-96	07-03-96	GMS Ashoran	
110	124	Nadar Khan	Hafizullah	MA/SLAMIAT	Shahdatul Alamia	17-03-71	SWAT	16-03-96	16-03-96	16-03-96	GMS Bafar	
111	125	Shawkat Ali	Ajab Khan	SSC	Shahdatul Alamia	08-03-69	SWAT	01-05-96	01-04-96	01-05-96	GMS Khankhi Bandai	
112	126	Muhammad Israil	Abdur Raziq	MA	B.Ed/Shahdatul Alamia	30-05-73	SWAT	25-06-97	25-06-97	25-06-97	GMS Guligram	

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113 -- Noorul Haq
 114 -- Ghousul Haq

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کشمیر و گلگت بلتستان خواتین اور بچوں کے مسائل پر
فہمائیہ ایس بابت ترقی (BS-16) عربی ٹیپر
پروٹوکول آرڈر نمبر 27-7-2013

US AS the centre
is related to DA
Abdul Khaliq
directed to
do as needed
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جناب عالی: شہزادہ آریس کے مسائل پیشخان ونگل دیوار AT حال سلطان محمد حسین صاحب سوات
آپ صاحبین کی توجہ مبذول کرانا چاہیے

یہ مسائل 4 سروری کا آرڈر 29-3-1988 بحیثیت عربی ٹیپر عثمانی محکمہ تعلیم کے زیر عمل میں لیا گیا ہے۔
یہ کہ مسائل کا نام سناری لسٹ جاری شدہ DEO صاحب ایجوکیشن سوات سیناری ٹیپر ایجوکیشن
یہ کہ مسائل کے ذریعہ بلا لسٹ آئیے صاحبان کے دفتر لایا گیا ہے اور موجود ہے۔
یہ کہ مسائل کا نام اجرا شدہ پروٹوکول میں شامل نہیں کیا گیا جو کہ سوات میں ملتی ہے۔
یہ کہ مسائل پر ترقی شدہ AT آرڈر - B.P.S-NO 15 میں کافی افراد جو کہ مسائل سناری
کے لحاظ سے جو ترقی نہیں ہو سکتے اور مسائل کو مدغم نظر انداز کر کے حق تلفی کی گئی ہے بلکہ مسائل
سیریل نمبر 51 اور جو ترقی یافتہ کو مثلاً سیریل نمبر 97 عظام دم سیریل نمبر 84 سیریل
سیریل نمبر 295 عن سیریل نمبر 100 روح الامین سیریل نمبر 11 بہتر نادر خان سیریل نمبر 104
قتل جاری سیریل نمبر 105 فضل ربی سیریل نمبر 106 محمد صالح العزیز سیریل نمبر 64 اظہار حسین وغیرہ
جو ترقی یافتہ کو ترقی دیا گیا ہے۔ اور مسائل کو اسکے جائز و قانونی حق سے محروم رکھا گیا ہے نقل لایا ہے
یہ کہ مسائل آپ صاحبان سے اٹھائے گئے ہیں۔ کہ مسائل ایسٹیشن ایجنٹ اور ذوالفقار منہی سے اٹھا کر دیا گیا
سر انجام دیا گیا ہے۔ اور دریں بابت مسائل انصاف و قانون کی دلائل گواہان ہیں
یہ کہ مسائل کی سناری کو مد نظر رکھتی ہوئے قواعد و ضوابط سیریل نمبر 16 اور پروٹوکول سناری سے
تسلیم ہوئے۔

فہمائیہ
AT آرڈر دیوار بائی سکول سلطان
مورخہ 2013-1-3
DEO Swat
05-03-11

G-25
788

OFFICE OF THE DISTRICT EDUCATION OFFICER SWAT AT GUL KADA

No. 7682
Dated 04/13/2013

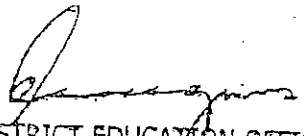
To

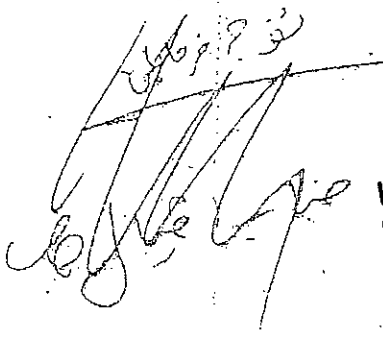
The Director,
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Subject: APPEAL IN R/O SHAMSHI KHAN AT

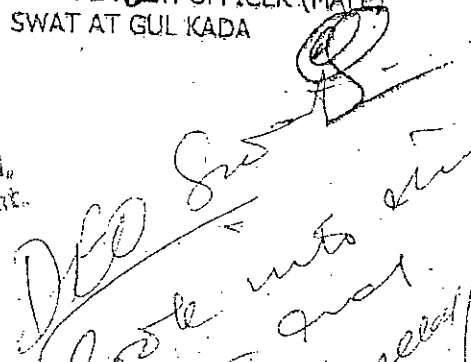
Memo:

The original application in respect of Mr. Shamsi Khan AT GHS: Matiltan duly recommended by the Hon: Minister for Education KPK along with all sanads is sent here with, with the request that the name of the above teacher was included in the seniority list of AT and placed at S. No. 51 but when the approval of AT received from your good self his name was not found in the said approval. The teacher concerned is eligible for the up gradation to BPS: 16. It is requested that necessary sanction/ approval to the up gradation of BPS: 16 in respect of above named teacher may be accorded please.


DISTRICT EDUCATION OFFICER (MALE)
SWAT AT GUL KADA



Attested
Head Master,
Govt: High School,
Matiltan, Distt: Swat.


DFO Swat
look into this
matter and
do the necessary
10
27/5/13

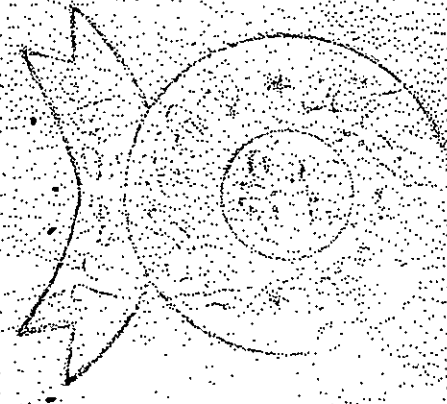
DFA/documents

Dy No 1882
29/3/0/3

27

27

رقم الشهادة:



شهادة الامتياز في العلوم الإسلامية بالمرجع في طهران

احمد لله رب العالمين والصلوة والسلام على خاتم الانبياء والمرسلين وعلى اله وصحبه اجمعين أما بعد فان رئاسة رجا والاراضي العربية
 بكستان قشرد بان الشيخ مولانا محمد شفيع خان - من هكده بيدار - من مصافقات سولات
 المولود في عام - - - - - قد اتم الدار سنة الهجرية في جامعة مصباح القرآن لاسراكن) - ونجح في امتحانها النهائي المنعقد تحت
 اشراف اتحاد المدارس العربية في شعبان ١٤١٦ هـ - بتقدير - اجيد - وبناء على ذلك استحق الشهادة العالمية ورئيس
 الاتحاد اذ يمنحة هذه الشهادة بقرصيه بتقوى الله تعالى ويسأل الله عز وجل ان يسلك به سبيل العلماء العاملين
 توقيع رئيس الامانة توقيع رئيس المدرسي توقيع رئيس الامانة

Abdul Wahab
 توقيع رئيس المدرسي

Abdul Wahab
 توقيع الامين العام



رقم التسجيل: ٢١٢
 رقم المراسل: ٢٣٨٩
 الاسماء: ٣٢٥/٢٠٠
 محل الاصدار: الكنف ارشيفي طهران
 التاريخ: ٧٢/١٩٩٦

ABDUL WAHAB

Sec. In BP Staff Gateded
 GHS Mallam, Malan, SVA

(28) (88)

NO. 2741008
DEPT. OF EDUCATION
GOVT. HIGH SCHOOL MATILAN SWAT

Consent upon receipt of Ashadul Alam in r/c Solvi, Charsad Khan, AT Charsad Matlan Kalam Swat is hereby allowed in P.S. NO. 12 with effect from 1.2.99, according to the notification NO. WD(ERO)4-1/89 dated, 27.8.91.

Necessary entry to this effect should be made in his S/Bo

(S/O. DEPT. OF EDUCATION)
S/O. DEPT. OF EDUCATION
GOVT. HIGH SCHOOL MATILAN SWAT

Reference: 2868-70

Dated, 2/3/1998

Copy to:-

- 1. The District Education Officer (D.E.O.) Swat.
- 2. The District Accounts Officer Swat.
- 3. The Headmaster of the Government High School Swat.

S/O. DEPT. OF EDUCATION
GOVT. HIGH SCHOOL MATILAN SWAT

Attested
[Signature]

HEAD MASTER
G. H. S. MATILAN
DIST. SWAT

Attested
Head Master,
Govt. High School,
Matilan, Distt: Swat.

Attested

X/0

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بکھنور جناب DEO (Male) صاحب سوات بمقام گلگدہ سید و شریف،
ضلع سوات

محکمہ ہمدردانہ اپیل برائے BPS-16 کو ترقی دیا جائے۔

جناب عالی!

ذیل عرض ہے۔

۱۔ یہ کہ مولوی شمش خان ولد گلگدہ یار سکھہ مظلتان، تحصیل کالام کا مستقل اور پیدائشی
باشندہ ہے۔

۲۔ یہ کہ بندہ گورنمنٹ ہائی سکول مظلتان میں بحیثیت عربی ٹیچر اپنے فرائض منصبی
سے سرانجام دیتا رہا ہے۔ 27/02/1988

۳۔ یہ کہ سائل کا پہلا آرڈر مذکورہ تاریخ پر کوالیفیکیشن کی بنیاد مولوی فاضل میٹرک اور
گورنمنٹ دارالعلوم اسلامیہ چارباغ کی اسناد کی بنیاد پر کیا گیا تھا۔

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۴۔ یہ کہ 2013ء میں Seniority کے بنیاد پر ضلع سطح پر AT اساتذہ کو 16 سکیل میں ترقی دیا گیا اور سائل Seniority List کے سیرکل نمبر 51 پر تھا اور سائل کو نظر انداز کر کے کافی سائل سے جو نیئر افراد کو ترقی دیا گیا۔

۵۔ یہ کہ نوٹیفیکیشن کی بنیاد پر پانچ سال سروس اور سیکنڈ ڈویژن میں میٹرک اور گورنمنٹ دارالعلوم اسلامیہ چارباغ سے سند الفراع یعنی شہادت العالمیہ پر موشن کے لئے شرط لگائی گئی تھی اور ان تمام کو الیفیکیشن کے بنیاد پر سائل اترتا ہے۔ لیکن سائل کو اس کے جائز اور قانونی BPS-16 کی پر موشن سے ابھی تک محروم رکھا گیا ہے جو کہ نا انصافی ہے۔

۶۔ یہ کہ نوٹیفیکیشن میں دوسری شرط ون تھرڈ پر موشن موجود تھی اور پانچ سال سروس مقرر کیا گیا تھا۔ لیکن سائل کی دورانہ ملازمت تقریباً تیس سال ہو گئی۔ جو ابھی تک اپنے سیناریٹی کے حق سے محروم رکھا گیا ہے۔

۷۔ یہ کہ گورنمنٹ دارالاسلامیہ چارباغ اور سید و شریف 1945ء سے محکمہ ایجوکیشن کے ساتھ AT اور TT پوسٹس کے لئے منظور شدہ چلے آئے ہیں۔ اور 2012ء میں KPK کے صوبائی گورنمنٹ نے ان دو دارالعلوم اور دو چترال والے دارالعلوم By name محکمہ ایجوکیشن کے ساتھ Notified کر کے ان کے

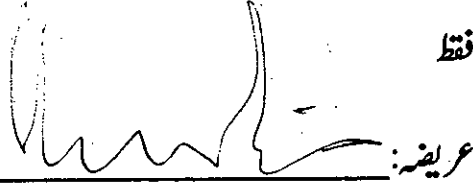
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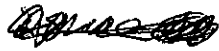
اسناد کو وفاق المدارس کے شہادت العالمیہ کے برابر تصور کر کے قرار دیا گیا ہے۔
اور نوٹیفیکیشن جاری کیا گیا ہے۔ (نقل لف ہے)۔

۸۔ یہ کہ سائل معروض ہے کہ تاریخ حق سے یعنی 2013ء کی پروموشن کی تاریخ سے
سائل کو Seniority کا حق بمعہ دیگر مراعات سمیت دینے کا حکم صادر فرمایا
جائے تو سائل تاحیات دُعا گورہیگا۔

نقطہ



سائل مولوی شمشی خان AT گورنمنٹ ہائی سکول ملتان



نوٹ:- تمام نقولات سندت اور آرڈر وغیرہ درخواست ہذا کے ساتھ لف ہیں۔

بعدالت جناب سروس ٹریبونل بمقام گلکدہ سید و شریف ضلع سوات

محکمہ تعلیم خیبر پختونخواہ

بنام

شمشی خان

درخواست بمراد واپسی مقدمہ/petition بہ اجازت نالش جدید

جناب عالی!

سائل حسب ذیل عرض رساں ہے۔

۱۔ یہ کہ مقدمہ عنوان بالا عدالت حضور میں زیر سماعت ہے، جس میں آج تاریخ پیشی مقرر ہے۔

۲۔ یہ کہ مقدمہ عنوان بالا میں سائل نے اپنی seniority کی حد تک ریلیف کی استدعا کی ہے۔ اب محکمہ تعلیم نے من سائل کو مورخہ 28.02.2019 سے seniority دی ہے۔ حالانکہ سائل seniority کا مورخہ 27.02.2013 کا حقدار ہے۔ سائل اس سلسلے میں محکمہ تعلیم میں متعلقہ فورم پر درخواست گزارنا چاہتا ہے اور اگر سائل کی حکمانہ درخواست منظور نہ کی گئی تو اس کے بعد تبدیل شدہ صورتحال کی تناظر میں سائل جدید مقدمہ/petition اس نسبت دائر کرے گا۔

۳۔ یہ کہ بحالات بالا مقدمہ عنوان بالا کو بہ اجازت نالش جدید واپس کرنا از حد ضروری اور قرین انصاف ہے۔

لہذا استدعا ہے کہ حسب عنوان عرضی درخواست ہذا احکامات صادر فرمائے

جائیں۔

عربیہ

سائل/شمشی خان بذاتہی

08-03-2019



OFFICE OF THE DISTRICT EDUCATION OFFICER (M) SWAT AT GULKADA
Cell # 0946 9240209-228

NOTIFICATION

Consequent upon the notification issued by the Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide his office Endst No 4675-80/File No.1/ Promotion Senior Arabic teacher BPS(16)2019 dated Peshawar 22/02/2019. The following Senior AT (Whose services were placed at the disposal of the DEO(M) Swat for further adjustment) are hereby adjusted against the posts in the schools noted against each in the interest of public service on regular basis under the existing policy of the provincial Govt; on the terms & conditions given in the aforementioned notification of the Director (E&SED) Khyber Pakhtunkhwa with immediate effect.

S.No	S.No	Name	Present School	School where promoted/posted	Remarks
1	27	Shamshi Khan	GHS:Matiltan	GHS Parrai	A.V.Post
2	35	Noorul Wahid	GMS:Ganjir	GHS Aboha	A.V.Post
3	66	Mohammad Zahid	GHSS:Sakhra	GHS Bandai	A.V.Post
4	94	Serajul Haq	GMS Dero Kabal	GHS Qalagay	A.V.Post
5	97	Samillah Jan	GMS Marghuzar	GHSS Chitor	A.V.Post
6	98	Mohammad Tayab	GHS Gura	GHS Sinpora	A.V.Post

CONSEQUENT ADJUSTMENT.

S.No	Name & Designation	Present School	Name of school were consequently adjusted	Remarks
1	Salcemullah AT	GMS Gabral	GMS Dedawar	Consequent adjustment
2	Nasar Khan AT	GMS Paridisha	GMS Marghuzar	-do-

TERMS AND CONDITION.

- 1) They would be on probation for a period of one year extendable for another one year.
- 2) They will be governed by such rules and regulations as may be issued from time to time by the government.
- 3) Their services can be terminated at any time in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be preceded under the rules framed time to time.
- 4) Charge report should be submitted to all concerned in duplicate.
- 5) Their inter -Se- Seniority on the lower post will remain intact.
- 6) No TA DA is allowed for joining his duty.
- 7) They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be covered and if he is wrongly promoted he will be reversed..

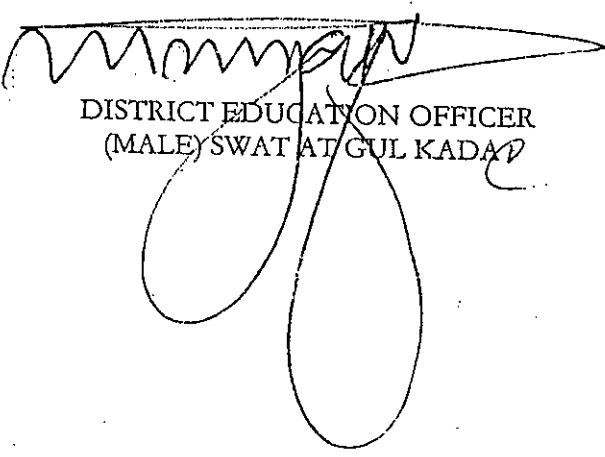
(NAWAB ALI)
DISTRICT EDUCATION OFFICER
SWAT AT GUL KADA

Endst No: 13354-57 /SAT/Promotion

dated: 28/2 2019

Copy of the above is forwarded for information & necessary action to: -

1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. The District Comptroller of Accounts Swat.
3. The Principal/ Headmaster concerned.
4. The candidate concerned.
5. PA to D E O local office.


DISTRICT EDUCATION OFFICER
(MALE) SWAT AT GUL KADA

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL No. _____ /2013

Mr. Shamshi Khan, A/T (BPS-15),
GHS Matiltan, District Swat APPELLANT

VERSUS

- 1- The Secretary of (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director of (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer (M), District Swat.
..... RESPONDENTS

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER DATED 27.2.2013 WHEREBY THE APPELLANT HAS BEEN IGNORED FROM PROMOTION TO THE POST OF SENIOR ARABIC TEACHER (BPS-16) AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF THIRTY DAYS

PRAYER: That on acceptance of this appeal the respondents may very kindly be directed to consider the appellant for promotion to the post Senior Arabic Teacher (BPS-16) from the date when appellant colleague/senior colleagues were promoted i.e. 27.2.2013 with all consequential benefits and so forth, or other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

FACTS:

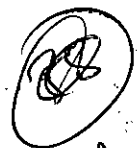

- 1- That appellant was appointed as Arabic Teacher in the respondent Department vide order dated 29.3.1988. That right from appointment till date appellant has performed his duty quite efficiently and up to the entire satisfaction of his superiors. Copies of the appointment order and service are attached as annexure A & B.

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J-

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- 2- That vide order dated 2.3.1998 the appellant was awarded BPS-14 on account of acquiring the degree of Shahadat Ul Alamia. That later on vide Notification dated 11.7.2012 the post of appellant was up graded to BPS-15 by the respondent Department. That according to seniority list of A.T teachers of the District Swat the appellant was placed at Serial No.51 of the seniority list dated 31.7.2012. Copies of the order, Notification and seniority list are attached as annexure **C, D and E.**
- 3- That on the above mentioned seniority list the appellant name was sent by the respondent No.3 to respondent No.2 for promotion to BPS-16 having senior most employee of the respondent Department. That vide order dated 27.2.2013 the respondent No.2 promoted the senior most A.T's of District Swat to BPS-16 but the appellant was astonished when he did not see his name in the said promotion order of A.T's despite having eligibility and seniority. Copies of the orders are attached as annexure **F and G.**
- 4- That appellant has the higher qualifications from the recognized madarssas and also have more than 25 years service at his credit and having eligibility for promotion to BPS-16 but because of that the respondent Department ignored the appellant from promotion to BPS-16 without any reason and justification. Copies of the educational testimonials and recognition certificates are attached as annexure **H & I.**
- 5- That feeling aggrieved appellant filed Departmental appeal before the respondent No.2 but no reply has been received so far. Hence the present appeal on the following grounds amongst the others. Copies of the Departmental appeal and comments are attached as annexure **J and K.**


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GROUND'S:

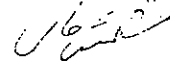
- A- That not promoting the appellant to BPS-16 by the respondent Department despite of having eligibility and seniority is against the law, facts and norms of natural justice.
- B- That the appellant has not been treated in accordance with law and rules on the subject noted above and as such the respondent Department violated Article 4 and 25 of the Constitution of Pakistan 1973.



- C- That the respondent Department acted in arbitrary and malafide manner by not promoting the appellant to the post of senior Arabic teacher (BPS-16).
- D- That under the one third formula the appellant is entitled to be promoted to the post of SAT (BPS-16) having seniority at serial No.51 of the seniority list of A.T in District Swat.
- E- That many colleagues and junior colleagues of the appellant have been promoted to the post of SAT (BPS-16) but the appellant has been ignored on the reason best known to the respondent Department.
- F- That despite of more than twenty five years service the appellant was ignored from the promotion of SAT (BPS-16) which not tenable under the law and prevailing rules.
- G- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore humbly prayed that the appeal of the appellant may be accepted as prayed for.

APPELLANT



SHAMSHI KHAN

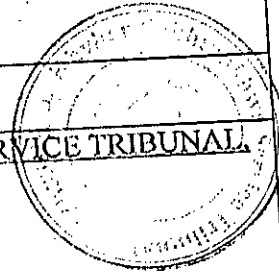
THROUGH:



NOOR MOHAMMAD KHATTAK
ADVOCATE



No.	Date of Order or proceedings.	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	07.11.2016	<p style="text-align: center;">BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL CAMP COURT SWAT</p> <p style="text-align: center;">Appeal No. 1079/2013</p> <p style="text-align: center;">Shamshi Khan Versus Secretary (E&SE), Khyber Pakhtunkhwa, Peshawar and two others.</p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p style="text-align: center;"><u>MUHAMMAD AZIM KHAN AFRIDI, CHAIRMAN:</u></p> <p style="text-align: center;">Counsel for the appellant and Mr. Muhammad Zubair, Senior Government Pleader for respondents present.</p> <p>2. Mr. Shamshi Khan Arabic Teacher, GHS Matiltal hereinafter referred to as the appellant has preferred the instant service appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against order dated 27.02.2013 vide which the appellant was declined promotion and where-against his departmental appeal dated 01.03.2013 was not responded constraining him to prefer service appeal on 21.06.2013.</p> <p>3. Brief facts of the case of the appellant are that he was appointed as Arabic Teacher vide order dated 29.03.1988. That the appellant was awarded up-gradation to BPS-14 vide order dated 02.03.1998 and then to BPS-15 vide order dated 11.07.2012. That the appellant was placed at serial No. 51 of the seniority list dated 31.07.2012. Vide order dated 27.02.2013 Arabic Teachers including juniors to appellant were promoted to BPS-16 while the appellant ignored despite having higher qualification and more than 25 years service at his credit constraining</p>



(A)

(36)

ATTESTED

(Signature)

Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

(Signature)

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him to prefer departmental appeal which was not responded and therefore the instant service appeal on 21.06.2013.

4. Learned counsel for the appellant has argued that the appellant was not promoted vide impugned order of promotions despite the fact that he was eligible to promotion on the basis of seniority-cum-fitness. That the method of recruitment, qualification and other conditions specified in the appendix to notification dated 13.11.2012 were not applicable to the case of the appellant as the said rules cannot be given retrospectivity.

5. In support of his stance learned counsel for the appellant placed reliance on case laws reported as 2012 PLC (C.S) 1285 (Supreme Court of Pakistan), 2010 PLC (C.S) 1075 (Supreme Court of Pakistan) and 2012 PLC (C.S) 1330 (Federal Service Tribunal).

6. Learned Senior Government Pleader has argued that according to the said rules the appellant was not eligible for promotion on the crucial date. That the said method of recruitment etc. were laid down in the appendix to notification with effect from 13.11.2012 while the promotion orders were made on 27.02.2013 and as such the question of retrospective application of the said method would not arise.

7. We have heard arguments of learned counsel for the parties and perused the record.

8. According to serial No. 2 of the appendix to notification dated 13.11.2012 the Senior Arabic Teacher (BPS-16) is to be appointed through promotion on the basis of seniority-cum-fitness from amongst Arabic Teachers with at least five years service as such and having qualification as prescribed for initial recruitment of Arabic Teacher.

ATTESTED

Signature
 K. J. Khan
 Senior Government Pleader,
 Peshawar

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(Handwritten marks)

According to serial No. 10 of the said appendix to notification dated 13.11.2012 Arabic Teacher (BPS-15) is to possess SSC second class certificate from recognized board with Shahdatul Alamia from recognized Tanzimatul Wafaqul Madaris or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other government run Darul Uloom as notified by the government from time to time or second class Master's Degree in Arabic from a recognized university. The appellant is not having such qualification to his credit. He has based his claim on a religious Sanad Ittehad-ul-Madaras Par Hoti Mardan which is not mentioned in the said appendix to the said notification dated 13.11.2012. Since the promotions were made after the notification of the said rules dated 13.11.2012 as such the said rules were given no retrospective effect against the appellant.

9. For the above mentioned reasons we find no force in the present appeal. The same is therefore dismissed, leaving the parties to bear their own costs. File be consigned to the record room.

Announced 07.11.2016 *Sd/- M. Azim Khan Afzali*
Camp Court
Swat

Certified to be true copy

(Signature)
 Khwaja...
 Swat

Sd/- Abdul Latif
Number

Date of Demand 17-11-16
 Number of Wad 1600
 Copying Fee 10
 Deposit 2
 Total 12
 Name of *SMD*
 Date of 17-11-16
 Date of 17-11-16

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- 1 -

IN THE SUPREME COURT OF PAKISTAN
(Appellate Jurisdiction)

L - 39

C.P.L.A. No. _____/2011

Shamshi Khan A.T. (BPS-15) Teacher G.H.S. Matiltan, District Swat.

-----Petitioner

VERSUS

1. The Secretary of (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education Department KPK Peshawar.
3. The District Education Officer (M) District Swat.

----- Respondents.

Civil Petition for Leave to Appeal under Article 212(3) of the constitution of Islamic republic of Pakistan 1973 against the Judgment and Order of Khyber Pakhtunkhwa Service Tribunal Camp Court Swat dated 07-11-2016 passed in Service Appeal No.1079/2013.

Respectfully Sheweth;

A- The points of law and grounds are as under:-

- I- Whether the Petitioner was obtained a certificate of Shahadul Alamia from a well recognized Madrassa, and as such the Petitioner cannot be deprived from his due right of promotion to the post of SAT (BPS-16)?
 - II- ~~whether on the said~~ Sanad the Petitioner was appointed as Arabic Teacher and later on promoted to BPS-14?
 - III- Whether at this stage the Respondents have no legal justification to deprive the Petitioner from promotion to the post of SAT (BPS-16)?
- 4

- 2 -
- (40)
- IV- Whether according to Appointment Rules 1989 the post of SAT (BPS-16) is purely non selection post for which seniority-cum-fitness is the criteria and as such the Petitioner is being senior most employee of the Respondent Department is fully eligible for promotion to the post of SAT (BPS-16)?
- V- Whether under the one-third formula the Petitioner is entitled to the post of SAT (BPS-16) having at serial No.51 of the seniority list in District Swat?
- VI- Whether the Petitioner has got more than 25 years service, who was illegally ignored from the promotion of SAT (BPS-16) which is not tenable under the law and prevailing Rules?
- VII- Whether the junior officers than the Petitioner were promoted to SAT (BPS-16), while the Petitioner was ignored?
- VIII- Whether Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973 was violated by the Respondents?
- IX- Whether the Hon'ble Service Tribunal has wrongly and illegally relied on the serial No.2 and 10 of the appendix to Notification dated 13.11.2012, ^{WHICH} are not applicable to the case of Petitioner and having no retrospective effect are in violation of the Rules and fundamental Law?
- X- Whether the Petitioner qualified certificate of Sanadul Faragh in 1986 from Charbagh Madrasa which is equal to M.A. and the Provincial Government vide Notification dated 3.4.2012 recognized Charbagh Madrissa and thus the Petitioner was issued a certificate of Shahadul-~~Aja~~^{Alia}/M.A. in the year 2014 and thus the Petitioner was duly qualified for the post of BPS-16?
- XI- Whether Mst. Bakh Pari was appointed on the Certificate of Ithad-ul-Madaris who was promoted to BPS-16?
- XII- Whether the Hon'ble Supreme Court have treated it as Master-degree and similarly Service Tribunal Khyber Pakhtunkhwa have accepted the Appeal on the basis of this Certificate?
- XIII- Whether the Petitioner has obtained M.A. qualification from two Madaris and if the Certificate of Mardan is not valid, the Certificate of Charbagh which is recognized is valid?

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B. The facts of the case are as under:

1. That Shamsi Khan Petitioner was appointed as Arabic Teacher vide order dated 29.03.1988 who was given up-gradation to BPS-14 vide order dated 2.3.1998 and then to BPS-15 vide order dated 11.07.2012.
2. That the Petitioner was placed at Serial No.51 of the seniority list dated 31.07.2012.
3. That Arabic Teachers including juniors to the Petitioner were promoted to BPS-16, while the Petitioner was ignored despite having higher qualification and more than 25 years service at his credit constraining him to prefer Departmental Appeal which was not responded and thus the Petitioner filed Service Appeal No.1079/2013 before the Khyber Pakhtunkhwa Service Tribunal, which was dismissed vide impugned judgment and order dated 07.11.2016 on the ground that the Petitioner have no qualification to his credit in accordance with Serial No.2 and 10 of the appendix to the Notification dated 13.11.2012.
4. That the Petitioner being aggrieved from the impugned judgment and order dated 07.11.2016 passed by Khyber Pakhtunkhwa Service Tribunal Camp Court Swat passed in Appeal No.1079/2013, is filing this Petition for Leave to Appeal on the Law points and Grounds mentioned in part "A" above.

It is, therefore, respectfully prayed that leave to appeal may please be granted.

Drawn and filed by

Mir Adam Khan
AOR for Petitioner

Certified that no such petition has earlier been filed by the petitioners against the impugned judgment.

Mr. Fazal Shah Mahmand ASC will argue and appear in the case.

Dated: 05-01-2017



Mir Adam Khan, AOR

M- (42) (8)

SUPREME COURT OF PAKISTAN
(Appellate Jurisdiction)

Present:

Mr. Justice Guizar Ahmed
Mr. Justice Mushir Alam

Civil Petition No.66 of 2017

{Against the judgment dated 07.11.2016, passed by the
Khyber Pakhtunkhwa Service Tribunal Camp Court Swat in
Appeal No.1079 of 2013}

Shamshi Khan A.T. (BPS-15) Teacher GHS
Matiltan, District Swat.

Petitioner(s)

VERSUS

The Secretary (E&SE) Department, KPK and
others.

Respondent(s)

For the Petitioner (s) : Mr. Fazal Shah Mohmand, ASC
Mir Adam Khan, AOR (Absent)

For the Respondent (s) : N.R.

Date of Hearing : 24.01.2018

ORDER

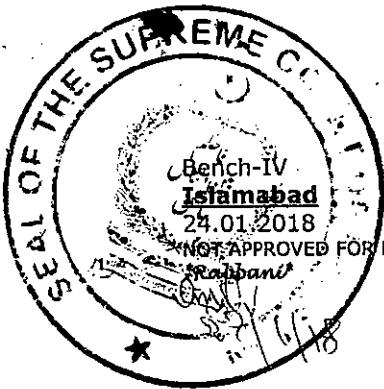
Guizar Ahmed, J:- Learned ASC for the petitioner after
arguing the matter at some length does not press this petition and
states that petitioner is going to avail another remedy.

2. The petition is dismissed as not pressed.

Sd/-, J
Sd/-, J

Certified to be True Copy

7/2/18
Court Associate
Supreme Court of Pakistan
Islamabad



CR No: 3056/18 Civil/Criminal
Date of Presentation: 06-02-18
No of Words: 300
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Compared by/Prepared by: [Signature]
Received by: [Signature]

(43)

N- بحضور جناب DEO (Male) صاحب سوات بمقام گلگدہ سید و شریف،

ضلع سوات

حکمانہ ہمدردانہ اپیل برائے BPS-16 کو ترقی دیا جائے۔

جناب عالی!

ذیل عرض ہے۔

۱۔ یہ کہ مولوی شمش خان ولد گلگدہ یار سکنہ مغلستان، تحصیل کالام کا مستقل اور پیدائشی باشندہ ہے۔

۲۔ یہ کہ بندہ گورنمنٹ ہائی سکول مغلستان میں بحیثیت عربی ٹیچر اپنے فرائض منصبی سے سرانجام دیتا رہا ہے۔ 27/02/1988

۳۔ یہ کہ سائل کا پہلا آرڈر مذکورہ تاریخ پر کوالیفیکیشن کی بنیاد مولوی فاضل میٹرک اور گورنمنٹ دارالعلوم اسلامیہ چارباغ کی اسناد کی بنیاد پر کیا گیا تھا۔



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۴۔ یہ کہ 2013ء میں Seniority کے بنیاد پر ضلع سطح پر AT اساتذہ کو 16 سکیل میں ترقی دیا گیا اور سائل Seniority List کے سیرکل نمبر 51 پر تھا اور سائل کو نظر انداز کر کے کافی سائل سے جو نیئر افراد کو ترقی دیا گیا۔

۵۔ یہ کہ نوٹیفیکیشن کی بنیاد پر پانچ سال سروس اور سیکنڈ ڈویژن میں میٹرک اور گورنمنٹ دارالعلوم اسلامیہ چارباغ سے سند الفراع یعنی شہادت العالمیہ پر دموشن کے لئے شرط لگائی گئی تھی اور ان تمام کو الیفیکیشن کے بنیاد پر سائل اترتا ہے۔ لیکن سائل کو اُس کے جائز اور قانونی BPS-16 کی پر دموشن سے ابھی تک محروم رکھا گیا ہے جو کہ نا انصافی ہے۔

۶۔ یہ کہ نوٹیفیکیشن میں دوسری شرط دن تھرڈ پر دموشن موجود تھی اور پانچ سال سروس مقرر کیا گیا تھا۔ لیکن سائل کی دورانہ ملازمت تقریباً تیس سال ہو گئی۔ جو ابھی تک اپنے سیناریٹی کے حق سے محروم رکھا گیا ہے۔

۷۔ یہ کہ گورنمنٹ دارالاسلامیہ چارباغ اور سید و شریف 1945ء سے محکمہ ایجوکیشن کے ساتھ AT اور TT پوسٹس کے لئے منظور شدہ چلے آئے ہیں۔ اور 2012ء میں KPK کے صوبائی گورنمنٹ نے ان دو دارالعلوم اور دو چترال والے دارالعلوم By name محکمہ ایجوکیشن کے ساتھ Notified کر کے اُن کے

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اسناد کو وفاق المدارس کے شہادت العالمیہ کے برابر تصور کر کے قرار دیا گیا ہے۔
اور نوٹیفیکیشن جاری کیا گیا ہے۔ (نقل لف ہے)۔

۸۔ یہ کہ سائل معروض ہے کہ تاریخ حق سے یعنی 2013ء کی پرموشن کی تاریخ سے
سائل کو Seniority کا حق بمعہ دیگر مراعات سمیت دینے کا حکم صادر فرمایا
جائے تو سائل تاحیات دُعا گورہیگا۔

فقط
عریضہ:

سائل مولوی شمش خان AT گورنمنٹ ہائی سکول ملتان

نوٹ:- تمام نقولات سندت اور آرڈر وغیرہ درخواست ہذا کے ساتھ لف ہیں۔

af

دستور

- (1) نام: "وحدت المدارس العربیہ الحکومیہ پاکستان"
- (2) اس میں چار مدارس شامل ہوں گے۔
 - ۱۔ گورنمنٹ دارالعلوم اسلامیہ سید و شریف سوات
 - ۲۔ گورنمنٹ دارالعلوم اسلامیہ چارباغ سوات
 - ۳۔ گورنمنٹ دارالعلوم عربیہ اسلامیہ چترال
 - ۴۔ گورنمنٹ دارالعلوم ربانیہ دروش چترال
- (3) اس کا صدر دفتر گورنمنٹ دارالعلوم سید و شریف میں ہوگا۔
- (4) اس کا شورئی کے کل آٹھ ارکان ہوں گے۔ ہر ایک مدرسے سے دو ارکان ضروری ہوں گے۔ اگر مسئلہ بہت ضروری ہو تو اس کیلئے چاروں مدارس کے تمام اساتذہ شورئی کے ممبران ہوں گے۔
- (5) مجلس عاملہ پانچ افراد پر مشتمل ہوگی۔ صدر، نائب صدر، ناظم عمومی، نائب ناظم، ناظم مالیات۔
- (6) **صدر:** مولانا عبدالقادر صاحب (صدر گورنمنٹ دارالعلوم اسلامیہ سید و شریف سوات)
- نائب صدر:** مولانا مسعود احمد صاحب (صدر گورنمنٹ دارالعلوم اسلامیہ چارباغ سوات)
- ناظم عمومی:** مفتی سردار صاحب (گورنمنٹ دارالعلوم اسلامیہ سید و شریف سوات)
- نائب ناظم:** مولانا حفیظ الرحمان صاحب (مدرس گورنمنٹ دارالعلوم عربیہ اسلامیہ چترال)
- ناظم مالیات:** مولانا عبدالہادی صاحب (مدرس گورنمنٹ دارالعلوم اسلامیہ سید و شریف سوات)
- (7) **چار مندرجہ ذیل:** ثانویہ عامہ، ثانویہ خاصہ، عالیہ اور عالیہ میں امتحان کا انتظام وحدت (بورڈ) لے گا۔
- (8) سال میں دو دفعہ شورئی کا اجلاس لازمی ہوگا اور تمام ارکان لازماً شرکت کریں گے۔ اس کے علاوہ صدر صاحب حسب ایجنڈا اجلاس بلا سکیں گے۔
- (9) مالی اخراجات میں چاروں مدارس مساوی حیثیت سے خرچہ برداشت کریں گے۔
طلبہ سے فی الوقت ثانویہ عامہ کیلئے = 200 روپے، ثانویہ خاصہ = 300 روپے، عالیہ = 400 روپے، عالیہ = 500 روپے
فی قارم۔
- (10) چاروں مدارس کے تمام درجات کے سندات وحدت (بورڈ) جاری کرے گا جس پر بورڈ کے صدر، ناظم عمومی اور متعلقہ مدرسہ کے دو عہدیدار دستخط کریں گے۔

عام علی الفاضل
مجلس عاملہ وحدت
11/1/13

امتحانات کے چند قواعد و ضوابط

(47)

- 1: وحدت میں شامل تمام مدارس کے طلبہ سے امتحان وحدت (بورڈ) لے گا۔
 - 2: ہر بالا درجے کے امتحان کے لیے تخطائی درجے کا مستند تصدیق نامہ (سرٹیفکیٹ) ضرور ہوگا۔
 - 3: دوسرے منظور شدہ مدارس کے سندت پر یا اس کے مساوی عام سکولوں یا بورڈ کے سرٹیفکیٹ پر امتحان میں شرکت کی اجازت دی جائے گی۔
 - 4: ثانویہ عامہ کی امتحان میں شرکت کے لیے متوسطہ یا سرکاری غیر سرکاری منظور شدہ سکول کے بڈل پاس سرٹیفکیٹ لازمی ہوگا۔
 - 5: ثانویہ خاصہ کی امتحان میں شرکت کے لیے ثانویہ عامہ + میٹرک منظور شدہ بورڈ سے ضرور ہوگا۔
 - 6: ہر تخطائی و فوقانی درجے کے امتحانات کے درمیان دو سال کا وقفہ (گیپ) ضروری ہوگا۔ آخری دو سال عالمیہ سال اول اور عالمیہ سال ثانی کے نام سے وفاق المدارس کے نصاب کے مطابق شمار کیا جائے گا۔
 - 7: عالمیہ سال اول کا امتحان بھی بورڈ لے گا جو کہ یونیورسٹی لیول کے ایم۔ اے پر پولیس کے برابر ہوگا اور اسے شہادۃ العالمیہ (سند الفراغ) کہا جائے گا جبکہ دوسرا سال ایم۔ اے فاضل کے طور پر شہادۃ العالمیہ (سند الفاضل) کے نام سے موسوم ہوگا اور اس کا امتحان بھی مدارس کا بورڈ (وحدت المدارس) لے گا۔
 - 8: اس بورڈ (وحدت المدارس) کے امتحانات کے لیے سلیبس نصاب (کورس) وہی ہوگا جو وفاق المدارس العربیہ پاکستان کا ہے۔ امتحانی قواعد بھی اس کے ہوں گے جب تک وحدت بورڈ کے شوری اپنے قواعد منظور نہیں کرتا۔
 - 9: امتحانات کی فیسوں میں حالات کے مطابق وقتاً فوقتاً اضافہ کیا جائے گا۔
- آج تاریخ 30 اپریل 2007ء گورنمنٹ دارالعلوم اسلامیہ سید و شریف میں چار حکومتی دارالعلوموں کے سربراہان/نمائندوں کا اجلاس ہوا۔ جس میں متفقہ طور سے اوپر دیے گئے 11 نکاتی دستور کے تحت ان چاروں دینی مدارس کا ایک اتحادی بورڈ قائم کیا گیا۔ جو ان مدارس میں نصاب امتحانات میں یکجہتی اور ترقی کے لیے کوشش کرے گا اور ایک ہی سند جاری کرے گا۔ اور اس کی متفقہ طور پر منظوری دی گئی۔ مدرسین نے بھی شرکت کی اور منظوری دی۔
- نوٹ:** امتحانات کے اوقات کے تعین کے لیے بوقت ضرورت بعد میں اجلاس بلا یا جائے گا۔

صدر مجلس القادریہ
وحدت المدارس العربیہ کے۔ پی۔ کے
پاکستان

برائے توثیق محمد اور
دستخط سید سراج

صدر مجلس القادریہ
گورنمنٹ دارالعلوم اسلامیہ
سید و شریف سوات پاکستان

20-10-2007

19

بورڈ وحدت المدارس العربیہ الحکومیہ میں شامل چار 04

گورنمنٹ مدارس کی اجمالی معلوماتی فہرست

1	اسماء مدارس	گورنمنٹ دارالعلوم اسلامیہ سید شریف ضلع سوات	گورنمنٹ دارالعلوم اسلامیہ چار باغ ضلع سوات	گورنمنٹ دارالعلوم عمر بیہ اسلامیہ ضلع چترال	گورنمنٹ دارالعلوم ربانیہ درویش ضلع چترال	
2	حیثیت	سرکاری ادارہ ملحقہ محکمہ ایجوکیشن	سرکاری ادارہ ملحقہ محکمہ ایجوکیشن	سرکاری ادارہ ملحقہ محکمہ ایجوکیشن	سرکاری ادارہ ملحقہ محکمہ ایجوکیشن	
3	تاریخ آغاز قیام	1945ء	1945ء	1952ء	1952ء	
4	کل رقبہ ادارہ	آباد: 7299 فٹ غیر آباد: 33660 فٹ کل رقبہ: 41959	آباد: 3883 غیر آباد: 40066 کل رقبہ: 43949			
5	عمارت	کمرہ عدد: 14 کتب خانہ: 1 عدد حال: 1 عدد کل تعداد: 16	دس کمرے (10) عدد زیر تعمیر: 3 عدد کل تعداد: 13	سجدہ حال: 1 عدد کمرہ: 9 عدد کتب خانہ: 1 کل تعداد: 10	ٹوٹل کمرہ: 12 کتب خانہ: 1 کل تعداد: 13	
6	تعداد اساتذہ (ملازمین)	اساتذہ: 12 درجہ چہارم: 3 ٹوٹل تعداد: 15	اساتذہ: 9 درجہ چہارم: 4 کل تعداد: 13	اساتذہ: 11	اساتذہ: 13	
7	تعداد انصاف	1862	420	700	350	
8	تعداد زیر تعلیم طلبہ موجودہ	267	225	103	170	
9	نصاب	چار مدارسوں میں اعدادیہ سے لیکر دودھ حدیث تک تمام درجات پڑھائے جاتے ہیں۔ اور نصاب میں وفات المدارس کے مطابق ہے				
10	طریقہ امتحان	ہر ایک مدرسہ میں سال میں دو مرتبہ ایک ششماہی اور دوسرا سالانہ امتحان لیا جاتا ہے۔				
11	سند کی حیثیت	<p>سند مدارس ہذا: سر دس روز کے مطابق AT.T.T. تقرری کیلئے باقاعدہ منظور تھے۔ جس کی کاپی منسلک ہے۔</p> <p>کاپی نمبر 1: 895F70-2 کاپی نمبر 2: 9965-2796-ح</p> <p>05-08-1984 16-12-1971</p> <p>کاپی نمبر 3: 10805-70/A 258 کاپی نمبر 4: 15-07-1973</p>				
12	صدر معلم کا نام	مولانا عبدالقادر صاحب	مولانا سید احمد صاحب	مولانا رشید احمد صاحب	مولانا عبدالرشید صاحب	

منجانب: مولانا عبدالقادر

صدر: وحدت المدارس العربیہ الحکومیہ

صوبہ سرحد

صدر: مولانا عبدالقادر صاحب
گورنمنٹ دارالعلوم اسلامیہ
سید شریف ضلع سوات
پلو شریف سوات پاکستان
26-5-73

صدر: مولانا عبدالقادر صاحب

گورنمنٹ دارالعلوم اسلامیہ
سید شریف ضلع سوات

27/5-10-30

4

تقابلی نقشہ نصاب تعلیم گورنمنٹ مدارس واقع سوات و چترال اور وفاق المدارس کا وضع کردہ نقشہ نصاب تعلیم

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گورنمنٹ درالعلوم اسلامیہ سید و شریف سوات، چارباغ، چترال، دروش چترال							نصاب تعلیم وفاق المدارس ملتان پاکستان						
نمبر شمار	متوسطہ	ثانویہ عامہ	ثانویہ خاصہ	عالمیہ	عالمیہ سال اول	عالمیہ سال دوم	نمبر شمار	متوسطہ	ثانویہ عامہ	ثانویہ خاصہ	عالمیہ	عالمیہ سال اول	عالمیہ سال دوم
1	قرآن مجید، حدراز پارہ ۲۱ تا آخر (ناظرہ)	ترجمہ و تفسیر، پارہ عم، حفظ و مشق پارہ عم ربیع ثالث، فوائد مکہ	ترجمہ و تفسیر، پارہ عم، حفظ و مشق پارہ عم ربیع ثالث، فوائد مکہ	تفسیر و اصول، الفوز الکبیر، جلالین شریف	اصول تفسیر و حدیث، التبیان فی علوم القرآن، شرح نخب الفکر	حدیث، سنن مع شمس	1	قرآن مجید، حدراز پارہ ۲۱ تا آخر (ناظرہ)	ترجمہ و تفسیر، پارہ عم، حفظ و مشق پارہ عم ربیع ثالث، فوائد مکہ	ترجمہ و تفسیر و حدیث، ازسورۃ یونس تا سورۃ عنکبوت، ریاض الصالحین، کتاب الجہاد تا آخر کتاب الدعوات	تفسیر و اصول، الفوز الکبیر، جلالین شریف	اصول تفسیر و حدیث، التبیان فی علوم القرآن، شرح نخب الفکر	حدیث، سنن مع شمس
2	فقہ و سیرت، بہشتی گوہر، سیرت رسول	حدیث لغت عربیہ و انشاء، زاد الطالبین کامل، القراۃ الراشدہ جز اول، معلم الانشاء جز اول	حدیث لغت عربیہ و انشاء، زاد الطالبین کامل، القراۃ الراشدہ جز اول، معلم الانشاء جز اول	حدیث، اصول حدیث و فرائض، ۱۔ مسند امام اعظم ۲۔ خیر الاصول ۳۔ سراجی	تفسیر، بیضاوی (ربیع پارہ اول)	حدیث صحیح مسلم	2	فقہ و سیرت، بہشتی گوہر، سیرت رسول	حدیث لغت عربیہ و انشاء، زاد الطالبین کامل، القراۃ الراشدہ جز اول، معلم الانشاء جز اول	حدیث، اصول حدیث و فرائض، ۱۔ مسند امام اعظم ۲۔ خیر الاصول ۳۔ سراجی	تفسیر، بیضاوی (ربیع پارہ اول)	حدیث صحیح مسلم	

صاحب

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 03 -04-2012

NO.SO(PE)5-12/SSRC/Darul Uloom/2012. In pursuance of the provisions contained in sub-Rule (2) of Rule-3 of Khyber Pakhtunkhwa Province Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 the Elementary & Secondary Education Department in consultation with the Establishment and Administration Department and the Finance Department hereby directs that in this Department's Notification No. SO(PE)4-5/SSRCVOL.III, dated 18-1-2011, the following further amendments shall be made, namely:-

AMENDMENTS

In this Appendix, against serial No. 2 and 3, in column No.3, after the words "Tanzim-UI-Wafaq-UI-Madaris", the words "or Darul-Uloom Saidu Sharif Swat, Darul-Uloom Charbagh Swat, Darul-Uloom Chitral, Darul-Uloom Darosh Chitral and any other Government run Darul-Uloom, as notified by the Government from time to time" shall be inserted respectively.

SECRETARY

Copy forwarded to:-

1. Additional Chief Secretary, FATA Warsak Road Peshawar.
2. All Administrative Secretaries Govt. of Khyber Pakhtunkhwa.
3. Secretary to Governor, Khyber Pakhtunkhwa.
4. Accountant General, Khyber Pakhtunkhwa.
5. Principal Secretary to Chief Minister Khyber Pakhtunkhwa.
6. Director Elementary & Secondary Education Khyber Pakhtunkhwa.
7. Director Curriculum & Teachers Education Abbottabad.
8. Director PITE Peshawar.
9. Director Education FATA Warsak Road Peshawar.
10. All District Coordination Officers in Khyber Pakhtunkhwa.
11. All Executive District Officers in Khyber Pakhtunkhwa.
12. All Agency Education Officers in FATA.
13. Director Information Khyber Pakhtunkhwa Peshawar with the request to give wide publicity through electronic & press media.
14. The Manager Govt. Printing Press Peshawar for publication in the next issue of Govt. Gazette.
15. Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
16. Chief Planning Officer Elementary & Secondary Education Department.
17. Senior Planning Officer Elementary & Secondary Education Department.
18. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
19. PS to Minister for Elementary & Secondary Education Khyber Pakhtunkhwa.
20. PS to Secretary / Special Secretary / Additional Secretary E&SE Department.
21. PA to Deputy Secretary (Admn) E&SE Department.
22. All Section Officers/Planning Officers / Statistical Officers, E&SE Department.
23. Deputy Director Database Administrator (EMIS) E&SE Department.

(MOHAMMAD AYUB KHAN)

SECTION OFFICER (PRIMARY)

VAKALATNAMA

*Before the Khyber Pakhtunkhwa Service Tribunal
Peshawar*

OF 2018

Shamsi Khan

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Department

(RESPONDENT)
(DEFENDANT)

I/We *Shamsi Khan*

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2018


CLIENT


ACCEPTED
NOOR MOHAMMAD KHATTAK


MUHAMMAD MAAZ MADNI
ADVOCATES

OFFICE:

Flat No.3, Upper Floor,
Islamia Club Building, Khyber Bazar,
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