

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 748/2018

Date of Institution ... 28.05.2018

Date of Decision ... 20.01.2022

Muhammad Hassan S/o Haji Malik Jabbar R/o 67-C, Circular Road, University
Town, Peshawar. ... (Appellant)

VERSUS

Secretary to Government of Khyber Pakhtunkhwa, Elementary & Secondary
Education Department Civil Secretariat Peshawar and others.
... (Respondents)

Muhammad Hassan
Appellant ... In Person

Muhammad Adeel Butt,
Additional Advocate General ... For respondents

AHMAD SULTAN TAREEN ... **CHAIRMAN**
ATIQ-UR-REHMAN WAZIR ... **MEMBER (EXECUTIVE)**

JUDGMENT

ATIQ-UR-REHMAN WAZIR MEMBER (E):- Brief facts of the case are

that the appellant was initially appointed as SET(Technical) vide order dated 06-04-1982 on fixed monthly pay and was subsequently confirmed as SET/SST vide order dated 04-11-1982. As per joint seniority list issued on 01-01-2018, name of the appellant was at serial No. 6 of the list, but date of regular appointment of the appellant was recorded as 16-10-1991, whereas the correct date as per stance of the appellant was 04-11-1982. Feeling aggrieved, the appellant filed departmental appeal dated 30-01-2018, which was not responded, hence the instant service appeal with prayers that the appellant date of regular appointment as SST may be declared as 04-11-1982 and to correct the final seniority list of SST, qua the appellant.

02. Appellant himself argued the case and contended that the impugned seniority list of SST dated 01-01-2018 is incorrect to the extent of him, as such needs rectification to that extent; that his services were confirmed/regularized vide order dated 04-11-1982 and the respondent No. 2 is estopped to make any change/alteration in the date of regularization of his service to the detriment of him; that his seniority as SST has to be reckoned from 04-11-1982, as reflected in the impugned seniority list; that insertion of 16-10-1991 as date of regularization of his service is glaring injustice and needs rectification; that the respondents have time and again confirmed that the date of regularization of his service as SET/SST is 04-11-1982 as reflected in notification dated 21-03-2009 of the respondent No. 1 and the respondents are prevented from any alteration in the same keeping in view the principle of locus poenitentiae; that by making alteration in the regularization of his service in the final seniority list made him junior to several other SST, who had joined service after him and are junior to the him.

03. Learned Additional Advocate General for the respondents has contended that the appellant was appointed against the post of SET/SST as an un-trained teacher and he has passed his B.Ed examination on 16-10-1991, from where he has been awarded seniority against the said post; that plea of the appellant regarding his confirmation against the mentioned post on 04-11-1982 is baseless and is liable to be dismissed; that the appellant is not entitled for the grant of seniority against the post of SET/SST for the un-trained period.

04. We have heard both the parties and have perused the record.

05. Placed on record is a notification dated 21-03-2009, where date of regular appointment of the appellant as SET/SST is 04-11-1982, whereas the same date has been changed in the seniority list dated 01-01-2018 and recorded as 16-10-1991. Stance of the respondents is that the appellant passed B.Ed examination on 16-10-1991; hence, he was regularized from that date. This Tribunal was not

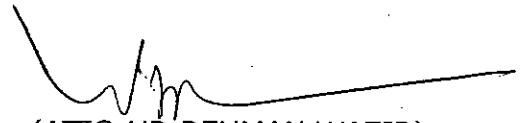
properly assisted by either party nor the record is complete to this effect, as nothing is available on record to show that services of the appellant were regularized from 1982 except notification dated 21-03-2009, where the appellant is shown as regularized with effect from 04-11-1982, hence we are constrained to partially accept the instant appeal and remand the case to the respondents to examine it afresh in light of notification dated 21-03-2009 and revise the seniority list accordingly. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED

20.01.2022



(AHMAD SULTAN TAREEN)
CHAIRMAN



(ATIQ-UR-REHMAN WAZIR)
MEMBER (E)

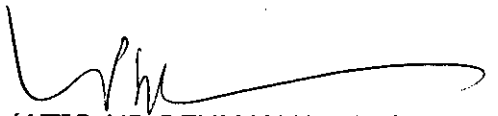
ORDER
20.01.2022

Appellant in person present. Mr. Muhammad Adeel Butt, Additional Advocate General for respondent present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, we are constrained to partially accept the instant appeal and remand the case to the respondents to examine it afresh in light of notification dated 21-03-2009 and revise the seniority list accordingly. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED
20.01.2022

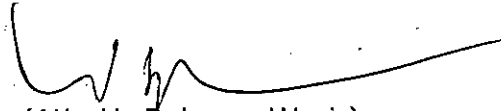

(AHMAD SULTAN TAREEN)
CHAIRMAN


(ATIQ-UR-REHMAN WAZIR)
MEMBER (E)

19.01.2022

Appellant in person and Mr. Muhammad Adeel Butt,
Addl. AG for the respondents present.

Arguments heard. To come up for order on
20.01.2022 before the DB.



(Atiq-Ur-Rehman Wazir)
Member (E)

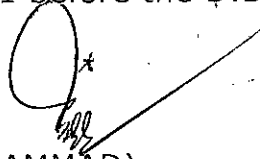


Chairman

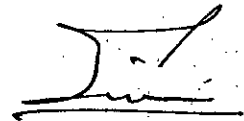
22.10.2021

Appellant in person present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Record as mentioned in previous order sheet dated 15.09.2021 has not been submitted by the respondents. Learned Additional Advocate General sought further time for production of the same on the next date. Adjourned. To come up for record as mentioned in order sheet dated 15.09.2021 and arguments on 26.11.2021 before the D.B.



(MIAN MUHAMMAD)
MEMBER (E)



(SALAH-UD-DIN)
MEMBER (J)

26.11.2021

Appellant in person present.

Mr. Kabirulah Khattak, Additional Advocate General for respondents present.

Learned Member Executive (Mr. Atiq-ur-Rehman Wazir), is on leave, therefore, case is adjourned. To come up for arguments on 18.01.2022 before D.B.



(Rozina Rehman)
Member (J)

18.01.2022

Appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for respondents present.

Learned AAG requested for adjournment that he has not gone through the record. Adjourned. To come up for arguments before the D.B on 19.01.2022.



(Atiq-Ur-Rehman Wazir)
Member (E)




Chairman

01.06.2021

Appellant in person present.

Muhammad Adeel Butt learned Additional Advocate General for respondents present.

Learned A.A.G made a request for adjournment in order to contact the respondents; granted. To come up for arguments on 28.06.2021 before D.B.


(Rozina Rehman)
Member (J)


Chairman

28.06.2021

Appellant present in person and Mr. Muhammad Rasheed, DDA for the respondents present.

The Worthy Chairman is on leave, therefore, the Bench is incomplete. To come up for arguments on 15.09.2021 before the D.B.


(Rozina.Rehman)
Member(J)

15.09.2021

Appellant present in person.

Asif Masood Ali Shah learned Deputy District Attorney alongwith Fazal Khaliq ADEO for respondents present.

For better assistance, the production of appointment order of appellant and all notifications regarding terms & conditions of the post of S.E.T existing at the time of appointment of appellant in 1982 and subsequent notifications bringing any change is necessary. The respondent Department shall produce the copies of the same on the next date for further arguments.

Adjourned to 22.10.2021 for hearing before D.B.


(Rozina Rehman)
Member (J)


Chairman

01.06.2021

Appellant in person present:

26.03.2021

Appellant in person and Mr. Noor Zaman, D.A. for the

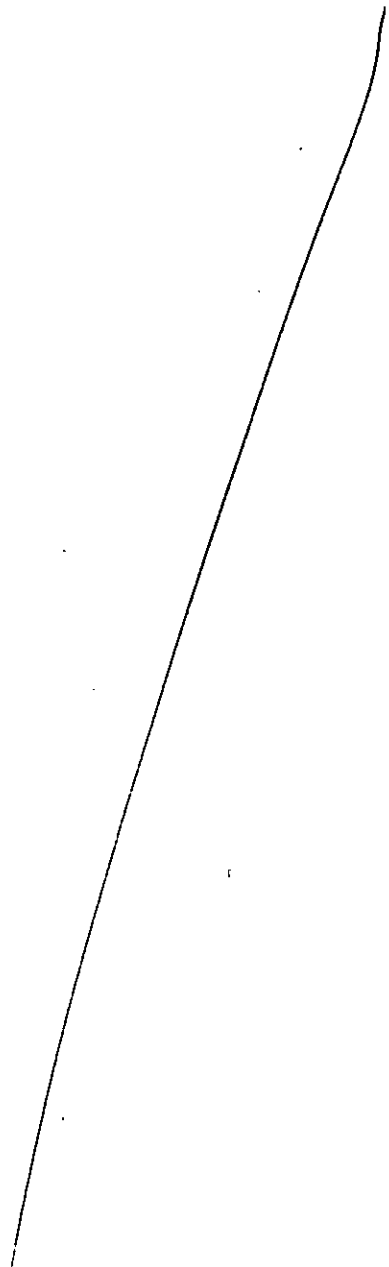
respondents present.

The Worthy Chairman is on leave, therefore, case is
adjourned to 01.06.2021 for hearing before the D.B.
order to contact the respondents, granted to come under
arguments on 28.06.2021 before D.B.

(Atiq-ur-Rehman Wazir)
Member(E)

(Rozina Rehm)
Member(E)

(Signature)



19.08.2020

Due to summer vacations, the case is adjourned to 21.10.2020 for the same.


Reader

21.10.2020

Junior to counsel for the appellant and Addl. AG for the respondents present.

The Bar is observing general strike today, therefore, the matter is adjourned to 12.01.2021 for hearing before the D.B.


(Mian Muhammad)
Member


Chairman

12.01.2021

Junior to counsel for the appellant and Mr. Kabirullah Khattak learned Addl. AG for respondents present.

Due to COVID-19, the case is adjourned for the same on ~~26.03~~ 26.03.2021 before D.B.


READER

24.12.2019

Learned counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 07.02.2020 before D.B.


Member


Member

07.02.2020

Appellant with counsel present. Mr. Riaz Khan Paindakheil learned Assistant Advocate General present. Learned counsel for the appellant seeks adjournment to furnish rejoinder. Adjourn. To come up for rejoinder/arguments on 24.03.2020 before D.B.


Member


Member

24.03.2020

Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 08.06.2020 before D.B.


Reader

08.06.2020

Bench is incomplete as learned Member (J) is on leave, therefore, the case is adjourned. To come up for the same on 19.08.2020 before D.B.


Reader

20.08.2019

Counsel for the appellant and Mr. Riaz Ahmad Paindakheil, Assistant AG for the respondents present. Learned counsel for the appellant once again requested for time to submit rejoinder. Adjourned to 03.10.2018 for rejoinder and arguments before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

03.10.2019

Counsel for the appellant present. Mr. Ziaullah, Deputy District Attorney for respondents present. Today again learned counsel for the appellant made a request to submit rejoinder. His attention is invited to order sheet dated 15.05.2019, 27.06.2019 and 20.08.2019, whereby time was sought by him for submission of rejoinder and allowed by this Tribunal. He is directed to make sure that rejoinder is submitted within a week's time and no further adjournment would be granted in future. Adjourned by way of last chance. To come up for rejoinder and arguments on 06.11.2019 before D.B.


Member

Member

06.11.2019

Appellant with counsel present. Mr. Usman Ghani learned District Attorney present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 24.12.2019 before D.B.


Member


Member

26.03.2019

Appellant with counsel and Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Hayat AD present. Representative of respondent department submitted written reply/comments. Adjourn. To come up for rejoinder/arguments on 15.05.2019 before D.B


Member

15.05.2019


Appellant alongwith his counsel and Mr. Kabirullah Khattak, Additional AG for the respondents present. Learned counsel for the appellant requested for adjournment to furnish rejoinder. Adjourned to 27.06.2019 for rejoinder and arguments before D.B.



(AHMAD HASSAN)
MEMBER


(M. AMIN KHAN KUNDI)
MEMBER

27.06.2019

Learned counsel for the appellant present. Mr. Muhammad Jan learned Deputy District Attorney for the respondents present. Learned counsel for the appellant requested for time to submit rejoinder. He is directed to submit rejoinder within a fortnight. Adjourned. Case to come up for arguments on 20.08.2019 before D.B.


(Hussain Shah)
Member


(M. Ahmad Hassan)
Member

Service Appeal No. 748/2018

14.12.2018

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG for the respondents present. Representative of the department is not in attendance therefore, notice be issued to the respondents with the direction to direct the representative to attend the court and submit written reply on the next date positively. Adjourned. To come up for written reply/comments on 23.01.2019 before S.B.



Muhammad Amin Khan Kundi
Member

23.01.2019

Learned counsel for the appellant present. Hayat Assistant Director representative of respondent department present. Written reply not submitted. Representative of the respondent department seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 12.02.2019 before S.B.



Member

12.02.2019

Clerk to counsel for the appellant present. Hayat AD representative of respondents No.2 and Daud Jan Superintendent for respondent No.3 present. Representative of the respondent No.3 submitted written reply which is placed on file and representative of the respondent No.2 seeks time to furnish written reply comments. No one present on behalf of respondent No.1. Notice be issued to respondent No.1 with direction to furnish written reply/comments. Adjourn. To come up for written reply/comments on behalf of respondents No.1 & 2 on 26.03.2019 before S.B.



Member

08.06.2018

Learned counsel for the appellant present. Preliminary arguments heard.

The appellant has preferred the present appeal for the purpose of correction of his date of regular appointment as SST in the seniority list pertaining to 01.01.2018.


Points raised need consideration. Admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days thereafter notices be issued to the respondents for written reply/comments. To come up for written reply comments on 08.08.2018 before S.B.

Appellant Deposited
Security & Process Fee


Member

08.08.2018

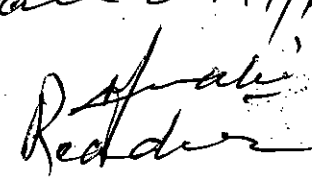
Counsel for the appellant and Mr. Kabirullah Khattak, AAG for the respondents present. Written reply not submitted. Requested for adjournment. To come up for written reply/comments on 03.10.2018 before S.B.


Muhammad Amin Khan Kundi
Member

03.10.2018



Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG for the respondents present. Representative of the department is not in attendance therefore, notice be issued to the respondents with the direction to direct the representative to attend the court and submit written reply positively on the next date. Adjourned. To come up for written reply/comments on 30.10.2018 before S.B.


(Muhammad Amin Khan Kundi)
Member

30-10-18 Due To Retirement of Honorable
chairman the Tribunal is now function
therefore the case is adjourned to
come up for the same on 14/12/18

Reader

Form-A
FORM OF ORDERSHEET

Court of _____
Case No. 748 /2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	28/05/2018	<p>The appeal of Mr. Muhammad Hassain presented today by Mr. Muhammad Asghar Khan Kundi 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 28/5/18</p>
2-	29/05/18.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>08/06/18.</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

In Re: Service Appeal No. 748 /2018

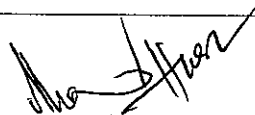
Muhammad Hassan Appellant

VERSUS

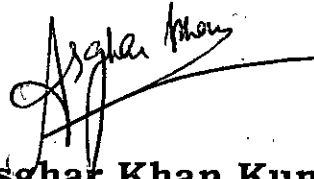
Secretary to Govt of KPK & others Respondents

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Service Appeal		1-5
2.	Affidavit		6
3.	Copy of the notification	A	7-8
4.	Copy of the seniority list dated 01.01.2018	B	9-14
5.	Copy of the departmental appeal	C	15
6.	Wakalat Nama		16


Appellant

Through



Muhammad Asghar Khan Kundi
Advocate, High Court Peshawar

1

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

In Re: Service Appeal No. 748 /2018

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1002

Dated. 28/5/2018

Muhammad Hassan

S/o Haji Malik Jabbar

R/o 67-C, Circular Road, University Town, Peshawar.

..... **Appellant**

VERSUS

1. Secretary to Govt of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department
Civil Secretariat Peshawar.
2. Director Elementary & Secondary Education,
Khyber Pakhtunkhwa, near Firdous Cinema
Peshawar
3. Director Education FATA,
FATA Secretariat, Warsak Road, Peshawar.

Filed to-day

..... **Respondents**


Registrar

28/5/18

APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT AGAINST THE FINAL

SENIORITY LIST OF SENIOR SCHOOL
TEACHERS AS IT STOOD ON 01.01.2018

Respectfully Sheweth:

1. That the Appellant was initially appointed as SET (Technical) on 06.04.1982 on fixed monthly Salary; the Appellant was confirmed as SET on 04.11.1982. The same is reflected in the notification dated 21.03.2009 of the Respondent No 1. **(Copy of the notification is Annex A)**

2. That the Respondent No 2 issued a fixed seniority list of the SST General, Science, Technical and Commerce of Elementary and Secondary Education Khyber Pakhtunkhwa as it stood on 01.01.2018. The Appellant name figure at serial No 6 of the said list, however the Appellant was shocked to note that although the date of his first appointment as SET has been correctly mentioned as 06.04.1982, the Appellants date of regular appointment as SET has been incorrectly mentioned as 16.10.1991, whereas the correct date is 04.11.1982. **(Copy of the seniority list dated 01.01.2018 is Annex B)**

3. That the Appellant submitted a departmental representation / appeal dated 30.01.2018 to the Respondent No 1 for redressal of his grievance. **(Copy of the departmental appeal is Annex C)**

4. That the Respondent No 1 failed to adjudicate upon the Appellant's appeal and no reply has been communicated to the Appellant.
5. That aggrieved of the incorrect entry in the final seniority list of SST dated 01.01.2018 and failure of the Respondent to rectify the same, the Appellant approach this Hon'ble Tribunal on the following amongst other grounds:

GROUNDS:-

- A. That the impugned seniority list of SST dated 01.01.2018 is incorrect to the extent of Appellant and as such needs rectification to that extent.
- B. That the Appellant was fully qualified at the time of his appointment as SET and as such his service were regularized/confirmed vide order dated 04.11.1982. The Respondent No 2 is estopped to make any changes / alteration in the date of regularization of the Appellant's service to the detriment of the Appellant.
- C. That the Appellant's seniority as SST has to be reckoned from 04.11.1982 and not from 16.10.1991, as reflected in the impugned seniority list. The insertion of 16.10.1991 as date of Appellant's regularization of service is glaring

(4)

injustice to the Appellant and needs rectification of the same by this Hon'ble Tribunal.

D. That the Respondents have time and again confirmed that the Appellant's date of regularization of service as SET/ SST is 04.11.1982, as reflected in notification dated 21.03.2009 of the Respondent No 1. The Respondents are prevented from any alteration in the same keeping in view the principle of locus poenitentiae.


E. That on account of the subject incorrect mentioning of the Appellant's date of regularization of service, in the final seniority list of SST, the Appellant has been made junior to several other SST, who had joined service after the Appellant and are junior to the Appellant.

F. That the Appellant seeks leave of this Hon'ble Tribunal to raise additional grounds at the time of arguments.

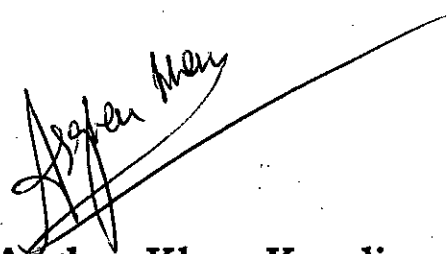
It is, therefore, humbly prayed that on acceptance of this appeal, the Appellant's date of regular appointment as SST may very graciously be declared as 04.11.1982 and direction be issued to the Respondents to correct the final seniority list of SST, quo the Appellant.

5

Any other relief deemed appropriate but not specifically asked for may also be granted.


Appellant

Through



Muhammad Asghar Khan Kundi
Advocate, High Court Peshawar

6

**BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

In Re: Service Appeal No. ____/2018

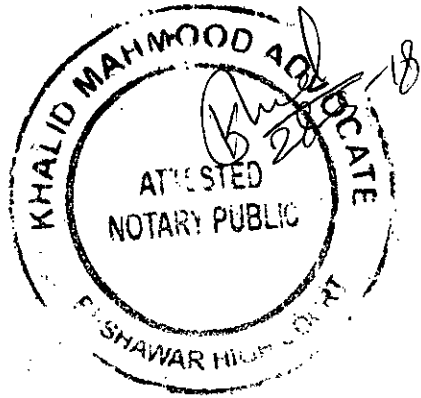
Muhammad Hassan Appellant

VERSUS

Secretary to Govt of KPK & others Respondents

AFFIDAVIT

I, Muhammad Hassan S/o Haji Malik Jabbar R/o 67-C, Circular Road, University Town, Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



[Handwritten Signature]

DEPONENT

CNIC # _____



Amman 'A'

7

GOVERNMENT OF NWFP
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT.

Dated 21-03-09

NOTIFICATION

No.SO(PE)2-6/SET(B-16)Upgradation to B-17: The Competent Authority on the recommendation of Departmental Promotion Committee and in consultation with Finance Department is pleased to allow one time up gradation from B-16 to B-17 (Personal) to the following 163 SETs Male, 132 SETs Female and 14 SETs (Technical) with immediate effect subject to the condition that the posts of SET shall be downgraded from B-17 to B-16 as and when vacated by the incumbents:

i) **163 SETs Male(General)**

S.No	Seniority List No.	Name of Officer	Date of Appointment as Regular SET	Present Place of Posting
1.	736A	Pasham Khan	27-11-85	A.A.E.O Office F.R.D.I.Khan
2.	838	Muhammad Shoaib	04-11-86	GHS Billitang Kohat
3.	869	Mohabbat Khan	14-12-86	GHS Kam- Shalman-Landi Kotal Khyber. Agency
4.	870	Yousaf Hussain	01-11-86	GHS Shalozan Kurram
5.	879	Munir Hussain	16-12-86	GHS Zeran Kurram
6.	942	Javed Khan	24-02-87	GHS Dingi Haripur
7.	943	Bahadar Ali	24-02-87	GMS Alamganj Swat
8.	944	Mohammad Younis	25-02-87	GMS Afzal Abad Mansehra
9.	953	Shamsher ali	04-03-87	ADO S/L DIK Surkamar (Khyber)

		Mehmood		
9.	96	Muhammad Iqbal	25-04-85	GCMS #3 Mardan
10.	99	Muhammad Zahir Shah	01-07-86	GHSS TOTAKAN Mkd Agency
11.	102	Ayaz Khan	30-10-86	GCHSS Kohat
12.	103	Muhammad Hassan	04-11-82	GHSS Jamrud Khyber Agency
13.	111	Ibad Ullah	16-10-89	GHSS Gulbahar Peshawar
14.	113	Naqib Ullah	16-10-90	GEC Mir Ali Miran Shah

SECRETARY TO GOVT. OF NWFP
ELEMENTARY AND SECONDARY
EDUCATION DEPARTMENT.

Endst No. No.SO(PE)2-6/SET(B-16)Upgradation to B-17: Dated 21-03-09

Copy Forwarded to the :

1. The Accountant General NWFP Peshawar
2. Secretary to Govt. of NWFP Establishment Department
3. Secretary to Govt. of NWFP Finance Department
4. Director Elementary & Secondary Education NWFP Peshawar
5. Director PITE NWFP Peshawar
6. Director Education FATA NWFP Peshawar
7. All EDOs E&SE in NWFP
8. All District /Agency Accounts Officers
9. PS to Chief Secretary NWFP
10. Officers concerned
11. PS to Minister Elementary & Secondary Education NWFP
12. PS to Secretary Elementary & Secondary Education NWFP
13. Office Order File


ARIF JAMIL
SECTION OFFICER (PRIMARY)

Annen 'B'

9

FINAL SENIORITY LIST OF SSTs-GENERAL, SCIENCE, TECHNICAL AND COMMERCE OF ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTUNKHWA STOOD ON 01.01.2018								
S.No	Name and Qualification	School/Office	Year of B.Ed	Date of Birth	Domicile	Date of Ist. Apptt.in Edu Deptt;	D/o of Appoint./Appr of SET	Remarks
1	2	3	4	5		6	7	8
1	ABDUL MAJEED SST (TECH) MA MED ASST. TECH	GMS CHAH MALIWANA D.I KHAN	1988	08.01.1965	DI KHAN	05.03.1988	05.03.1988	
2	IMD AMMAD AYUB SST (TECH)	GCMHS NO.1 D.I KHAN	1988	20.10.1963	DI KHAN	15.12.1985	25.03.1988	
3	IMD WAJEED GUL SST MA EDUCATION	GHS BAGH BAN PURA AKORA KHATTAK NOWSHERA	1989	26.02.1960	NOWSHERA	25.1982	12.11.1990	
4	IMD F ULLAH SST (TECH)	GHSS BAGHDADA MARDAN	1990	02.01.1964	MAFDAN	27.12.1990	27.12.1990	
5	IMD ALI KHAN SST TECHNICAL	GHS TAKHT BHAI MARDAN	1988	30.11.1959	MARDAN	17.01.1991	17.01.1991	
6	IMD AMMAD HASSAN SST (TECH)	GHS SUR KAMAR KHYBER AGENCY	1991	16.05.1959	NWA	06.04.1982	16.10.1991	
	IMD AMMAD SALEEM SST (TECH)	GHS NO.1 MINGORA SWAT	1991	06.05.1960	SWAT	15.5.1982	15.10.1991	
	IMD ELAHI S/O FAZAL ELAHI SST BA TECHNICAL	GHSS NO 1 HARIPUR	1991	06.01.1962	HARIPUR	26.06.1983	16.10.1991	
	IMD ULLAH SST (TECHNICAL)	GHS MIRAN SHAH NWA	1991	12.04.1963	FR BANNU	16.10.1991	16.10.1991	
	IMD ALI S/O USMAN WALI SST TECHNICAL	GHS NO.2 BANNU	1991	08.04.1964	FR BANNU	19.06.1986	16.10.1991	
	IMD HASSAN S/O KHUDA BAKHSH SST MA BED	GHS KURRAI DI KHAN	1992	15.06.1963	DI KHAN	16.11.1987	22.12.1992	
	IMD ZEAIN AHMAD S/O NOOR IMD AMMAD SST MA BED	GOVT. SHAHEED RIZWAN SAREER HIGHER SECONDARY SCHOOL UTMANZAI CHARSADDA	15.04.1993	01.04.1965	MOHMAND AGENCY	09.03.1987	15.04.1993	
	IMD DAYAT ULLAH SST MA MED	GHS DABLI LAWAGHAR KARAK	29.04.1993	03.03.1966	KARAK	07.04.1988	25.04.1993	FOREGONE PROMOTION
	IMD SHABIR AHMAD SST MA B ED	GCMHS ABBOTTABAD	1993	10.6.1964	HARIPUR	23.03.1985	07.09.1993	
	IMD SAJM KHAN SST BSC.B.ED	GMS DASHKA SWA	5.3.1994	15.09.1961	SWA	11.3.1987	05.03.1994	
	IMD SHAH JAHAN SST	GHSS MOHANDARI, MANSEHRA	5.3.1994	22.10.1961	MANSEHRA	23.11.1985	05.03.1994	
	IMD FARAZ SST MA B ED	GHSS SHAHBAZ KHEL LAKKI MARWAT	8.5.1994	8.3.1964	FATA	11.3.1990	05.05.1994	
	IMD AHMAD HUSSAIN SST	GHS NO.2, TANGI, CHARSADDA	8.5.1994	7.5.1960	CHARSADDA	10.12.1989	05.05.1994	
	IMD YUSAF KHAN MA B ED	GHS MANKIAL, SWAT	8.5.1994	10.7.1966	SWAT	12.12.1985	10.11.1994	
	IMD NAZIR SHAH SST BA BED	GHS MALANGAI BAJOUR AGENCY	8.5.1994		FATA	25.06.1989	10.11.1994	
	IMD M. HAMMAD HANIF		1994			10.11.1994	10.11.1994	
	IMD M. HAMMAD AWAIS	GHS HAAWAL	1994	24.03.1963	ABBOTTABAD	29.05.1989	10.11.1994	
	IMD ASGHAR KHAN		1994			10.11.1994	10.11.1994	
	IMD M. HAMMAD TAHIR		1994			10.11.1994	10.11.1994	
	IMD SAHIDULLAH SST BA BED	GHS MOHAMMAD KHEL NWA	1994		FATA	10.11.1994	10.11.1994	
	IMD SAIFER REHMAN		1994			10.11.1994	10.11.1994	
	IMD SAID ALI BAKHASH		1994			23.10.1986	10.11.1994	
	IMD M. BIRAK SHAH SST	GHS YUSAF KHEL MOH AGY	1994	1.9.1966	MOHMAND AGENCY	15.11.1994	10.11.1994	
	IMD SHAMSHER KHAN MA B ED	GHS HAKIM KHAN BANNU	1994	1.2.1962	BANNU	10.3.1993	10.11.1994	
	IMD ALI RAFI HUSSAINI BA B ED	GHS NATHIA GALI A ABAD	1994	5.3.1963	ABBOTTABAD	10.11.1994	10.11.1994	
	IMD ANJUM JILAH MSC B ED	GHS JALBAI SWABI	1994	2.3.1965	SWABI	10.11.1994	10.11.1994	
	IMD SAIFUR RAHMAN		1994			10.11.1994	10.11.1994	
	IMD SAHID DAE KHAN	GHS RAGHZI KALLAN NWA	1994	14.03.1970	FR BANNU	10.11.1994	10.11.1994	
	IMD SAIF MUHAMMAD BSC B ED	GHS WANDA AURANGZEB	1994	4.8.1964	BANNU	10.11.1994	10.11.1994	
	IMD SAHID RAHMAN		1994			10.11.1994	10.11.1994	
	IMD SAHIL KARIM		1994			10.11.1994	10.11.1994	
	IMD SAIF AD		1994			10.11.1994	10.11.1994	

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S.No	Name and Qualification	School/Office	Year of B.Ed	Date of Birth	Domicile	Date of Ist. Apprt: in Edu Deptt;	U/o of Appoint: /Appr of SET	Remarks
37	MR MUHAMMAD QASIM BA B ED	GHS KALAM SWAT	1994					
38	MR SAIF ULLAH KHAN BA B ED	GHS GAND SARH	1994	15.04.1968	SWAT			
39	MR RIAZ MUHAMMAD		1994	2.1.1965	GRAYZAI AGENCY	10.11.1994	10.11.1994	
40	MR RIAZ QURESHI BA B ED	GHS NOZKAT	1994			10.11.1994	10.11.1994	
41	MR. BAAJIR KHAN MA B ED	GHS HAZARA SWAT	1994	10.5.1965	KARAK	4.12.1982	10.11.1994	
42	MUHAMMAD ASLAM KHAN BA B ED	GHS DAGGAR AMAR ZAI BANNU	1994	5.3.1960	SWAT	22.10.1989	10.11.1994	
43	MUHAMMAD IQBAL MA B ED SST	GHS KOZARA	1994	25.01.1965	BANIRU	4.12.1982	10.11.1994	
44	SHAMSUR REHMAN		1994	1.4.1961	FATA	10.11.1994	10.11.1994	
45	ABDUL HAFEEZ MA B ED SST	GHS AHMAD KHEL BANNU	1994			1.9.1985	10.11.1994	
46	MUHAMMAD HAFIZ KHAN SST MA B ED	GHS KOPRA DI KHAN	1994	15.03.1964	BANIRU	16.10.1986	10.11.1994	
47	BHALAM CASIM BSC B ED SST	GHS KALAZAI DI KHAN	1994			1.9.1988	10.11.1994	
48	SAJID MAHMOOD		1994	11.11.1966	BANNU	10.4.1986	10.11.1994	
49	SAID KHAN BA MED SST	GHS NOZKAT	1994		DI KHAN	24.11.1985	10.11.1994	
50	FAZLI KABIR AFRIDI	GHS ZIA DAFK AGENCY	1994	7.10.2005	KARAK	1.10.1985	10.11.1994	
51	SAFDAR ALI BSC B ED SST	GHS GADEZAI BUNER.	1994	25.2.1962	KURRAM AGENCY	24.11.1985	10.11.1994	
52	IRSHAD ALI BSC B ED SST	GHS CHARSADDA	1994	5.5.1964	SWAT	2.2.1981	10.11.1994	
53	IQBAL SHAH	GHS GULISTAN ORKAGY.	1994	2.1.1965	CHARSADDA	10.11.1994	10.11.1994	
54	IQBAL UR REHMAN BSC B ED	GHS NOZKAT	1994	15.12.1966	ORAKZAI AGENCY	10.11.1994	10.11.1994	
55	IHRAR HUSSAIN		1994	15.04.1966	KARAK	10.11.1994	10.11.1994	
56	FIDA MUHAMMAD MSC B ED	GHS YHAZI MAWAZ KORONA	1994			10.11.1994	10.11.1994	
57	SHOUKAT MAHMOOD MA EDU	GHS HAHANGIAN H PUR	1994	11.10.1964	CHARSADDA	10.11.1994	10.11.1994	
58	NIJAZ MUHAMMAD KHAN BA B ED	GHS CHOWGASWAT	1994	8.10.1965	ABBOTTABAD	10.11.1994	10.11.1994	
59	MUHAMMAD SHAFIQ SST MA EDU	GCMHS TUFEELA TOWNSHIP HARIPUR	1994	8.9.1961	SWAT	25.01.1987	10.11.1994	
60	UBAIDULLAH BA B ED	GHS GAWALAR SWAT	1994	02.09.1963	HARIPUR	7.12.1988	10.11.1994	
61	MUHAMMAD ANJUM TAHIR BA B ED	GHS TORAMANDI	1994	4.4.1963	SWAT	02.03.1986	10.11.1994	
62	ABDUS SABOOR		1994	2.11.1960	MARDAN	24.09.1987	10.11.1994	
63	FAZLI MAHMOOD MSC B ED	GHS KOHSAF DIR	1994			14.09.1987	10.11.1994	
64	FARIDULLAH		1994	1.1.1961	DIR	1.12.1986	10.11.1994	
65	ABDUL JABBAR KHAN		1994			1.12.1986	10.11.1994	
66	ZAKARIA SST MA B ED	GHS BAGAN AABAD	1994			10.11.1994	10.11.1994	
67	M. HUSSAIN AZAD		1994	3.4.1965	ABBOTTABAD	8.10.1964	10.11.1994	
68	ALI AKBAR		1994			14.07.194	10.11.1994	FOREIGN PROMOTION
69	ASHRAF HUSSAIN MA EDU	GHS DILCOPI	1994			10.11.1994	10.11.1994	
70	ZIA AHMAD KHAN	GHS NOZKAT	1994	15.03.1967	MANSEHRA	10.11.1994	10.11.1994	
71	HASRAN GUL BSC B ED	GHS NOZKAT	1994	28.10.1965	DI KHAN	10.11.1994	10.11.1994	
72	MUHAMMAD CASIR BSC B ED	GHS AHNOZ	1994	16.08.1961	KARAK	10.11.1994	10.11.1994	
73	MUHAMMAD SADIQ BSC B ED	GHS RAJOLAHAD	1994	6.1.1962	SWAT	1.12.1988	10.11.1994	
74	SHAKIR ULLAH BA B ED	GHS BELA EFAMAD KHEL	1994	15.04.1963	ABBOTTABAD	10.11.1994	10.11.1994	
75	MUHAMMAD SALIM BA B ED	GHS SHANGLA PAVAN	1994	6.7.1964	PESHAWAR	5.4.1967	10.11.1994	
76	ABDUL QASIM MA B ED	GHS PATRAN DIR	1994	1.1.1964	MANSEHRA	11.1.1966	10.11.1994	
77	BAHRAWAF	GHS MANFAL	1994	1.2.1966	CHARSADDA	9.10.1962	10.11.1994	
78	MIR OASIM MA B ED	GHS MANFAL	1994	5.3.1960	SWAT	10.11.1994	10.11.1994	
79	ABDUL HANIF		1994	14.10.1963	LAKKI MARWAT	4.12.1982	10.11.1994	
80	ISAAMUL HANIF	GHS MANFAL	1994	20.01.1964	SWABI	17.11.1964	10.11.1994	
81	MUHAMMAD ASLAM MA B ED	GHS MUHAMMAD MARDAIR BAN	1994	11.4.1964	LAKKI MARWAT	7.10.1982	10.11.1994	
82	TAHIR KHAN		1994	13.11.1963	BANIRU	10.11.1994	10.11.1994	

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S.No	Name and Qualification	Station/Office	Year of B.Ed	Date of Birth	Domicile	Date of Ist. Appt: in Edu Deptt;	Date of Appoint: /Appr of SET	Remarks
83	MUHAMMAD SALAM		1994					
84	MUHAMMAD SAJJAD MA EDU	GHS BANNU	1994			2.10.1982	10.11.1994	
85	AHMAD SHIRAZ	GHS SHALAZAN	1994	6.16.1968	ABBOTTABAD	21.05.1992	10.11.1994	
86	RAZIATULLAH, MSC; BED	GHS SHALAZAN	1994	31.03.1964	HARIPUR	2.10.1982	10.11.1994	
87	ABDUL GASIM BSC B ED	GHS MALIK JAN	1994	15.04.1961	SWABI	12.10.1983	10.11.1994	
88	MUHAMMAD AYAZ SST BA BED	GHS MALIK JAN	1994	6.2.1965	SWABI	16.11.1994	10.11.1994	
89	SHER MUHAMMAD	GHS BANNU	1993	01.04.1968	FR BANNU	12.09.1987	10.11.1994	FOREGONE PROMOTION
90	TEHSINULLAH KHAN	GHS BANNU	1992		MOHMAND AGENCY	10.11.1994	10.11.1994	
91	REHMANULLAH BA BED	GHS DALAZAN	1994	3.10.1964	PESHAWAR	21.12.1985	10.11.1994	
92	HAMIDULLAH JAN BA BED	GHS MUSLIM PESHAWAR	1994	3.1.1965	CHARSADDA	4.12.1988	10.11.1994	
93	JUNAID AKHTAR S O SHAH ALAM KHAN		1994		KARAK	10.11.1994	10.11.1994	
94	MUHAMMAD JAVED	GHS BANNU	1994	29.04.1967	BANNU	11.12.1989	10.11.1994	
95	SHAM ASLAM S.O.K. BAKHASH.		1994		D.I KHAN	21.08.1985	10.11.1994	
96	HUR HUSSAIN BANGASH S.O NASIR HUSSAIN	GHS SHALAZAN	1994	19.03.1968	KURRAM AGENCY	10.11.1994	10.11.1994	
97	SHERIN ZADA SST BA BED	GHS DHEP	1994	11.1.1961	SWAT	28.11.1988	10.11.1994	
98	MUHAMMAD NAWAZ		1994		FR KOHAT	10.11.1994	10.11.1994	
99	AZIZUL HAQ BSC MED	GHS RAHIM PESHAWAR	1992	1.8.1964	SWAT	21.09.1987	10.11.1994	
100	KALIMULLAH KHAN		1994		D.I KHAN	10.11.1994	10.11.1994	
101	ABBAS ALI MA B ED	GHS SAMI	1994	16.04.1963	KURRAM AGENCY	10.11.1994	10.11.1994	
102	MUHAMMAD AURANGZEB MA MED	GHS ZIARAT MAHATMA AABAD	1994	15.05.1966	ABBOTTABAD	1.10.1985	10.11.1994	
103	MARAFIO JADOON MA MED	GHS MADARSA AABAD	1991	16.06.1964	ABBOTTABAD	21.11.1984	10.11.1994	
104	MUHAMMAD ISHAQ BSC B ED	GHS SHEZAR	1992	1.1.1966	SWAT	26.09.1988	10.11.1994	
105	MUHAMMAD ALMARAFIRI	GHS SHALAZAN	1992	20.10.1966	FR KOHAT	21.04.1990	10.11.1994	
106	MALIK JAN		1994		FR KOHAT	10.11.1994	10.11.1994	
107	KHALID KHAN		1994		FR KOHAT	10.11.1994	10.11.1994	
108	FAIZUR REHMAN		1994			10.11.1994	10.11.1994	
109	ZARI AMAN MA B ED	GHS SHALAZAN	1994	21.04.1963	SWAT	10.11.1994	10.11.1994	
110	KHAI RULLAH JAN SST MA B ED	GHS SARA	1992	10.1.1965	LAKKI MARWAT	16.09.1986	10.11.1994	
111	SAMIA ALI SHAH	GMS BUDA	1994	18.05.1966	ABBOTTABAD	16.09.1986	10.11.1994	
112	SHAHBUDIN	GHS ASEBAP	1994	3.1.1961	HARIPUR	10.11.1994	10.11.1994	
113	MEHRUDIN SST	GHS MUHAMMAD	1994	10.2.1962	NWA	10.11.1994	10.11.1994	
114	MUHAMMAD SABIR MA B ED	GHS THAL	1991	28.08.1958	KOHAT	7.12.1984	10.11.1994	
115	WAHEED KHAN MA B ED	GMS SHEER	1994	1.3.1962	SWAT	24.10.1982	10.11.1994	
116	AKHTAR REHMAN SST		1992			10.11.1994	10.11.1994	
117	MR MUTAHER HUSSAIN BA B ED SST	GHS KIPMAN	1994		FATA	1.10.1985	10.11.1994	
118	MUHAMMAD IRSHAD BA BED SST	GHS NEA	1994	2.4.1964	MANSEHRA	20.11.1985	10.11.1994	
119	MASOOD JAN SST MA BED	GHS SHALAZAN	1994	12.1.1963	CHARSADDA	13.10.1988	10.11.1994	
120	MR LIAQAT ALI SST MA BED	GHS MALIK JAN	1994	21.05.1965	FATA	21.10.1987	10.11.1994	
121	MR MASROOF SHAH SST MA B ED	GHS MALIK JAN	1994	5.7.1960	HARIPUR	7.1.1991	31.12.1994	
122	MR KIFAYAT ULLAH SST MA BED	GHS MALIK JAN	1994	6.4.1966	PESHAWAR	13.10.1987	21.02.1995	
123	MR ZIA UD DIN SST	GHS MALIK JAN	1995	3.4.1958	MARDAN	15.12.1987	23.05.1995	
124	MR MUHAMMAD JAMIL MA B ED	GHS MALIK JAN	1985	13.12.1957	ZONEIV	26.10.1975	23.05.1995	
125	MR. AJMAL KHAN MA B ED	GHS MALIK JAN	1985	10.12.1959	ZONEIV	2.2.1985	23.05.1995	
125-A	SAIF UR REHMAN S/O ABDUL AZIZ SST MA MED	GMS CHAND	1985	18.05.1961	LAKKI MARWAT	02.12.1985	23.05.1995	

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S.No	Name and Qualification	School/Office	Year of B.Ed	Date of Birth	Domicile	Date of Ist. Apptt: in Edu Deptt;	D/O of Apptt: / Appr of SET	Remarks
126	MR. KHALILUR REHMAN MA B ED	GHSS MAMA KHEL LAYKI MARWAT	1992	16 10 1952	ZONE IV	14 04 1981	23 05 1995	
127	MR. SYED LAZ HUSSAIN MA B ED	GMS Y. LACHI WALA D I KHAN	1992	9 1 1957	D I KHAN	21 10 1985	23 05 1995	
128	MR. BASHIR KHAN BED	GHS MALAKAND AGENCY	1992	20 03 1955	MALAKAND	24 11 1985	23 05 1995	
129	MR. MOMIN KHAN SST MA B ED	GHS M. MUHAMMAD AKBAR KHAN TANK	1992	20 11 1952	D I KHAN	26 04 1973	23 05 1995	
130	MR. KHAN ZAMAN SST MA B ED	GHS NO. 1 HANGU	1992	5 1 1960	KARAK	12 1.1980	23 05 1995	
131	MR. AWAL YAZ SST MA B ED	GHS NARYAB KOHAT	1992	9 11 1952	KARAK	14 10.1976	23 05 1995	
132	MR. SHAHID HAYAT SST MA B ED	GHS ZHARAT ALLAHQAD KOHAT	1992	1 1.1959	KARAK	11 12.1980	23 05 1995	
133	MR. AMAN ULLAH KHAN SST MA B ED	GHS KIFI HAIDER TANK	1992	1 4 1952	BANNU	2 11 1980	23 05 1995	
134	MR. JAMSHED NAWAZ SST MA B ED	GHS PAI TANK	1992	8 10 1955	D I KHAN	6 11.1985	23 05 1995	
135	MR. MUHAMMAD ZAFRAN SST MA B ED	GMS DPAND KOHAT	1992	17 04.1962	KARAK	29 11.1981	23 05.1995	
136	MR. ABDUL HAMID SST MA B ED	GHS USTARZAI BALA KOHAT	1992	1 2.1960	KOHAT	7.12.1981	23 05 1995	
137	MR. SAFEERULLAH SST MA B ED	GHS TOPA STANA KOHAT	1992	17 08 1962	D I KHAN	13 01 1987	23 05 1995	
138	MR. SARWAR KHAN SST MA B ED	GHS JAEBAR	1992		KARAK	13 10.1973	23 05.1995	
139	MR. FARHATULLAH SST MA B ED	GHS HATANA SWABI	1992	1 5.1956	SWABI	10 2.1986	23 05 1995	
140	MR. MUHAMMAD RAHMAN SST MA B ED	GHS KOTHA SWABI	1992	12 12.1957	MARDAN	13 11.1975	23 05.1995	
141	MR. HAKIM SST	GHS RAHANKOT DIR	1992		DIR	1 9 1966	23 05 1995	
142	MR. RAFIQ AHMAD SST	GHS KAD	1992	1 1.1958	DIR	18 03.1975	23 05 1995	
143	MR. MUHAMMAD SIRAJ SST	GHS AMIORI	1992	4.4.1958	SWAT	15.12.1976	23 05.1995	
144	MR. MUTABAR SHAH S O SIFFAT GUL SST	GHS MALAK ABAD SWABI	1992	4.1.1958	SWABI	17.12.1980	23 05.1995	
145	MR. ALI HAIDER SST MA BED	GHSS DHERAI SWAT	1992	19 04.1959	SWAT	17 01.1982	23 05.1995	
146	MR. ABDULLAH SST	GMS KASALGRAM	1992	1 2.1959	SWAT	13 11 1979	23 05.1995	
147	MR. GUL RAUF KHAN SST BA BED	GHS	1992	3 5.1961	FR BANNU	8.1.1983	23 05 1995	
148	MR. GHULAM SERWAR	GHS TAKHT BAI	1992	3 12 1957	MARDAN	25 11.1985	23 05 1995	
149	MR. RASHID MEHMOOD	GHS KAKOTRI	1992	10 2.1960	ABBOTTABAD	3 10.1983	23 05.1995	
150	MR. ZAHD ALI	GHS KRIFION	1992	2 4.1964	HARIPUR	9 9.1982	23 05 1995	
151	MR. TARIQ MAHMOOD	GHS	1992	20 11.1961	HARIPUR	12 6.1985	23 05 1995	
152	MR. MOHIBULLAH MA B ED	GHS BADIN DIR	1992	9 2.1966	DIR	19 02.1991	23 05 1995	
153	HUSSAIN AHMAD SST MA MED	GHS SHAH NOOR PULL MARDAN	1992	01 01 1961	MALAKAND	05 02.1986	23 05.1995	
154	MR. MUHAMMAD SHAKIR TANOOULI BA	GHS SWABI	1992	21 03 1956	SWABI	24 09.1988	23 05.1995	
155	MR. MUNSIF KHAN SST MA B ED	GMS B-DALGRAM MANSEHRA	1992	15 04.1961	MANSEHRA	5 6 1985	23 05.1995	
156	MR. ABDUR RASHID MA B ED	GMS LASOOR	1992	10 1.1960	ABBOTTABAD	14 10.1985	23 05.1995	
157	MR. MUHAMMAD SHER KHAN S O M ZAIB MA B ED	GHS MATTA SWAT	1992	7 7.1961	SWAT	12 10 1986	23 05 1995	FOREGONE PROMOTION
158	MR. RUSTAM KHAN SST	GHS LAHALA	1992	1 5 1958		1 5 1995	23 05 1995	
159	MR. MUHAMMAD MISKIN MA B ED	GHS SUJAL ABBOTTABAD	1992	15 04.1963	BATTAGRAM	1 6 1988	23 05 1995	
160	MR. MUHAMMAD ASLAM MED	GHS SHAH VASHTO FR PESHAWAR	1992	10 1 1960	FR PESHAWAR	18 09 1978	23 05 1995	
161	MR. WASIULLAH MA B ED	GHS SUFAYAN KHWAR M/ OH AGY	1992	10 4 1952	MALAKAND	6 10 1980	23 05 1995	
162	MR. MUHAMMAD HAROON SST MA B ED	GHS CHAMBIYAL MANSEHRA	1992	15 03.1956	MANSEHRA	5 3 1983	23 05 1995	
163	MR. PARVEZ KHAN SST MA B ED	GHS THALDA	1992	21 05 1956	MANSEHRA	12 3 1983	23 05 1995	
164	MR. PARVEZ KHAN SST MA B ED	GHS MATTA PANI	1992	15 01.1959	ABBOTTABAD	16 03.1983	23 05 1995	
165	MR. WAZIR RAHMAN MA B ED	GHS	1992	21 12 1958	FR PESHAWAR	2 2 1978	23 05 1995	
166	MR. AFZAL KHAN MA B ED	GHS	1992	15 05.1959	FR PESHAWAR	14 07 1986	23 05 1995	

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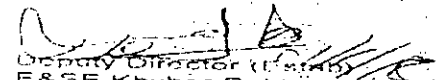
S.No	Name and Qualification	School/Office	Year of B Ed	Date of Birth	Domicile	Date of 1st Apptt: in Edu Deptt:	D/o of Appointt./Appr of SET	Remarks
167	SYED ABDUS SATTAR SHAH SST MA BED	GHSS NO 1 PESHAWAR CANTT	1990	20/02/1952	PESHAWAR	1/10/1983	23/05/1995	
168	MR. ZEENAT KHAN SST BA BED	GHSS BANNU	1990	22/2/1954	BANNU	8/9/1988	23/05/1995	
169	MR. AZHAR FAZLAN MA B ED	AAEO LANDI KOTAL KHY AGY	1990	25/08/1951	KURRAM AGENCY	15/10/1980	23/05/1995	
170	MR. FAIZ MUHAMMAD MA BED	GHS PARANG GHAR	1990	24/1/1960	MALAKAND	2/10/1992	23/05/1995	
171	MR. MUHAMMAD SHAFIQ MA B ED	GHS Pany Khy SWA	1990	5/03/1960	SWA	15/04/1981	23/05/1995	
172	MR. AMAN ULLAH KHAN MA B ED	GMS ABDUR REHMAN FR BANNU	1990	30/06/1964	FR BANNU	24/04/1983	23/05/1995	
173	MR. M. SAFAR KHAN MA B ED	GHS Dherakai Bajour Agency	1990	5/1/1961	BAJOUR AGENCY	16/07/1987	23/05/1995	
174	MR. V. TABAR KHAN MA B ED	GHS	1990	24/1/1960	FR BANNU	31/10/1983	23/05/1995	
175	MR. Z. HEER ULLAH SST MA B ED	GHS GHANI KORONA MOH AGY	1990	13/04/1958	MALAKAND	01/09/1977	23/05/1995	
176	MR. MASOOD AZHAR BA BED	GHS MOHAMMAD KHEL FR BANNU	1990	25/03/1960	FR BANNU	1/12/1984	23/05/1995	
177	MR. ABDUR REHMAN BA BED	GHS SHAWA NWA	1990	4/11/1956	FR BANNU	11/02/1978	23/05/1995	
178	MR. H. SANULLAH BA BED SST	GHS FARIDI (FR-PESHAWAR)	1990	25/09/1951	FR KOHAT	01/01/1981	23/05/1995	
179	MR. FIDA MUHAMMAD SST		1991	14/1/1959	SWAT	1/11/1986	23/05/1995	
180	MR. MUHAMMAD ZAHID SST		1991	5/6/1958	CHARSADDA	25/10/1986	23/05/1995	
181	MR. FAZLULLAH MA B ED SST	GHS EIDAK N.W.A.	1991	10/1/1959	ITWA	3/10/1988	23/05/1995	
182	MR. FAZLI KHALI MA MED	GHS NO.4 MINGORA SWAT.	1991	2/11/1952	SWAT	19/12/1982	23/05/1995	
183	MR. JOHAR ALI	GHS TOTALAI BUNER	1991	10/1/1960	DIR	8/10/1983	23/05/1995	
184	MR. SAMIULLAH MA B ED SST	GHSS S.K. BALA BANNU	1991	25/05/1964	BANNU	25/09/1992	23/05/1995	
185	MR. AFZAL KHAN MA B ED SST	GMS GARYUM NWA	1991	2/5/1963	FR BANNU	17/12/1981	23/05/1995	
186	MR. NARA KHAN MA B ED	GHS	1991	3/3/1963	KOHAT	7/11/1985	23/05/1995	
187	MR. M. DARIS KHAN MA B ED SST		1991	4/8/1960	FR BANNU	3/10/1980	23/05/1995	
188	MR. MUHAMMAD YAS	GHS WAZIR BAGH PESHAWAR	1991	15/12/1964	PESHAWAR	12/01/1987	23/05/1995	
189	MR. ABDUR BAKI KHAN BA BED	GHS NO.1 BANNU	1991	1/5/1954	BANNU	16/09/1985	23/05/1995	
190	MR. JAVID IOBAL	GHS KHARIAN	1991	2/3/1951		12/11/1986	23/05/1995	
191	MR. M. FA KHAN MA MED	GHS TARKI ISMAIL KHAL	1991	3/3/1963	FR KOHAT	7/11/1985	23/05/1995	
192	MR. NASEEB ALI SHAH BA BED	GHS MATURA LAKKI MARWAT	1991	5/1/1958	BANNU	16/11/1982	23/05/1995	
193	MR. FAQIR MUHAMMAD MA B ED	GHS SIKANDARI MARDAN	1992	3/2/1960	MARDAN	18/10/1984	23/05/1995	
194	MR. ASOUL HAFIZ	GHS SHANGLAI PAYAN	1992	2/12/1963		9/2/1987	23/05/1995	
195	MUHAMMAD ZAMAN SST BA BED	GHS PATTAN KHURD ABBOTTABAD	1992	1/5/1950	ABBOTTABAD	13/10/1985	23/05/1995	
196	MR. MIAN MAUHER JAN	GHS No.1 Mingora SWAT	1992	10/5/1950	SWAT	7/12/1988	23/05/1995	
197	MR. SHEER MUHAMMAD MSC BED	GHS KOWA	1993	5/03/1965		1/11/1980	23/05/1995	
198	MR. TARIQ AHMAD KHAN	GHS NO 2 HAVALIAN	1993	4/5/1963	ABBOTTABAD	15/10/1988	23/05/1995	
199	MR. MUJAWAR KHAN	GHS	1993	5/5/1956	DIR	17/12/1989	23/05/1995	
200	MR. FARANG ZEE BA BED	GHS CHING GOLI BUNER	1993	4/05/1963	BUNER	18/02/1990	23/05/1995	
201	MR. SYAHL KHAN BA BED	GHS DHINDA	1993	22/2/1963		28/05/1990	23/05/1995	
202	MR. FARQAT AL KHAN	GHS SIALBAT	1993			17/10/1989	23/05/1995	
203	Mr. ... SST MA B ED	GHS BAKA KHEL BANNU	1993	19/12/1955	BANNU	09/09/1989	23/05/1995	
204	MR. ... MA B ED	GHS GHUNDAI SHEKHAN FR D I KHAN	1993	20/1/1957	FR D I KHAN	31/12/1994	23/05/1995	
205	MR. ... MSC BED	GHS	1993	1/2/1963	FR BANNU	19/09/1989	23/05/1995	
206	MR. ... MA B ED	GHS BORKI KURRAM AGENCY	1993	1/1/1956	KURRAM AGENCY	20/01/1990	23/05/1995	
207	MR. ... MSC BED		1993	1/1/1956	ITWA	20/10/1994	23/05/1995	
208	MR. ... MA B ED	GHS MOHAMMAD NARI CHARSADDA	1993	1/1/1957	MOHMANE AGENCY	14/12/1989	23/05/1995	
209	MR. ... SST BA BED	GHS KOT ATAL SHARIF	1993	1/12/1956		24/09/1984	23/05/1995	
210	MR. ... AN MSC BED	GHS BEAR HARIPUR	1993	1/4/1957	HAZARA	3/11/1992	23/05/1995	
211	MR. ... SST MA B ED	GHS SURGUL KOHAT	1993	1/2/1951	KOHAT	10/12/1987	23/05/1995	
212	MR. ... MA B ED	GHS ALIZAI KURRAM AGENCY	1993	2/1/1952	FATA	20/10/1981	24/05/1995	

14

S.No	Name and Qualification	School/Office	Year of B.Ed	Date of Birth	Domicile	Date of Ist. Apptt. in Edu Deptt.	D/O of Appointt./Appr of SET	Remarks
5105	MUHAMMAD ISHFAQ KHAN MA MED	GHS DHEENDHA	2011	16.6.1965	HAZIPUR	17.09.1986	03.01.2012	
5106	MUHAMMAD ASHRAF SST BA BED	GHS AHL MANSEHRA	2008	13.04.1959	MANSEHRA	08.05.1999	08.03.2012	
5107	MUHAMMAD BASHIR SST MA BED	MANSEHRA	2008	02.03.1979	MANSEHRA	17.03.2012	17.03.2012	
5108	FAZAL WAHID SST MA BED	BUNER	2008	27.02.1975	BUNER	17.03.2012	17.03.2012	

CERTIFICATE:

It is certified that the Seniority List is Final, Undisputed & not Subjudice in any Court.


Deputy Director (E&SE)
E&SE Khyber Pakhtunkhwa
PESHAWAR
11/2/2018



The Secretary Education,
(Elementary & Secondary Education),
Govt. of Khyber Pukhtoonkhwar, Peshawar.

Annexure C

15

Sub:- APPEAL AGAINST THE INCORRECT ENTRY OF THE APPELLANT'S SENIORITY IN THE FINAL SENIORITY LIST OF SENIOR SCIENCE TEACHER(SSTs) AS IT STOOD ON 1.1.2018.

Respected Sir,

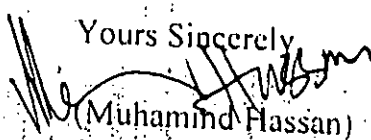
The appellant submits as follow:-

- 1- That the appellant is an employee of Education Deptt., presently posted as SST(Tech) at GHS, Sur Kamar, Khyber Agency.
- 2- That the appellant was appointed as SET(Technical) in the education Deptt. on 6.4.1982. und his services were confirmed vide order dated 4.11.1982. The same is reflected in the notification dated 21.03.2009 issued by your good office(Copy annexure A).
- 3- That the Directorate of Elementary & Secondary Education, KPK has issued final seniority list of SSTs wherein the appellant's date of appointment as regular SET(serial No.6) has been wrongly mentioned as 16.10.1991 instead of 4.11.1982. (Copy of Seniority list is annexure B).
- 4- That aggrieved of the same the appellant approach your goodself to redress his grievance.

It is, therefore, most humbly prayed that on acceptance of this appeal, the appellant's seniority in the final seniority list of SSTs as it stood on 1.1.2018 may very kindly be corrected and as a consequential relief the appellant's date of appointment as regular SET be corrected as 4.11.1982 instead of 16.10.1991.

The appellant shall be highly obliged for this favour on your part.

Dated 30-1-2018

Yours Sincerely

(Muhammad Hassan)
S/O Haji Malik Jabbar,
SST, GHS, Sur Kamar,
Khyber Agency.



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL.

SERVICE APPEAL NO. 748/2018

**Mr. Muhammad Hassan SET Technical GHSS Jamrud Tribal
District KhyberAppellant.**

Versus

- 1. Secretary to Govt. of KPK Elementary & Secondary Education
Department Peshawar.**
- 2. Director KPK Elementary & Secondary Education
Department Peshawar.**
- 3. Director Education new merged Districts..... Respondents.**

Parawise Comments on behalf of Respondent No. 3.

Preliminary objections.

- That the Appellant has got no cause of action, locus standi to file the instant Petition.
- That the appeal is not maintainable being devoid of merits.
- That the appellant has concealed material facts from honorable court.
- That the appellant has not come to this Court with clean hands.
- That the appellant case is badly time barred.
- That the appellant is estopped by his own conduct to bring the instant Petition.

Respectfully Shewith.

1. No comments. Pertains to record.
2. No comments. Relates to respondent No. 2. Director Education (new merged Districts respondents No. 3 has no power to interfere in the subject case as all sorts of works all of SET / S.S / Head Mater are dealt with by Director Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar. It is further submitted that the seniority list is being maintained by Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar, therefore the appellant may approach to Elementary and Secondary Education Department for the redressal of his grievances.
3. Incorrect. Respondents No. 3 has no relevancy with the subject case.
4. Incorrect. Relates to respondents No. 1.
5. No Comments. Hence denied.

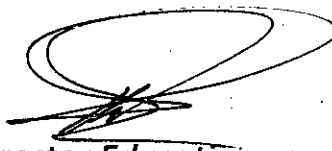
GROUNDS.

- A. *Incorrect. Relates to respondents No. 1 & 2.*
- B. *Incorrect. Respondents No. 3 is not principal respondent in the subject case.*
- C. *No comments. Pertain to record.*
- D. *No comments. Relates to respondent No. 1 & 2.*
- E. *As explained in para -D above.*
- F. *Respondents are also seeks permission to advance the grounds and proofs at the time of arguments.*

Pray.

In the light of above factual position it is humbly prayed that the appeal in hand may very graciously be dismissed having no legal grounds.

Respondent No.3

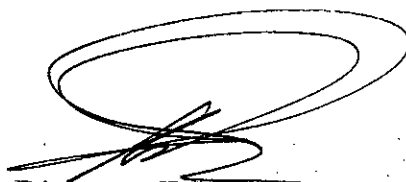


**Director Education new
merged Districts**

AFFIDAVIT

I, the above respondents, do hereby solemnly affirm and declare, that the contents of the comments are true and correct to the best of my knowledge and belief that nothing has been concealed from this Honorable Court

Respondent No. 3



**Director Education
New merged Districts**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL.

SERVICE APPEAL NO. 748/2018

Mr. Muhammad Hassan SET Technical GHSS Jamrud Tribal
District KhyberAppellant.

Versus

1. Secretary to Govt. of KPK Elementary & Secondary Education Department Peshawar.
2. Director KPK Elementary & Secondary Education Department Peshawar.
3. Director Education new merged Districts..... Respondents.

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- That the appeal is not maintainable being devoid of merits.
- That the appellant has concealed material facts from honorable court.
- That the appellant has not come to this Court with clean hands.
- That the appellant case is badly time barred.
- That the appellant is estopped by his own conduct to bring the instant Petition.

Respectfully Shewith.

1. No comments. Pertains to record.
2. No comments. Relates to respondent No. 2. Director Education (new merged Districts respondents No. 3 has no power to interfere in the subject case as all sorts of works all of SET / S.S / Head Mater are dealt with by Director Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar. It is further submitted that the seniority list is being maintained by Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar, therefore the appellant may approach to Elementary and Secondary Education Department for the redressal of his grievances.
3. Incorrect. Respondents No. 3 has no relevancy with the subject case.
4. Incorrect. Relates to respondents No. 1.
5. No Comments. Hence denied.

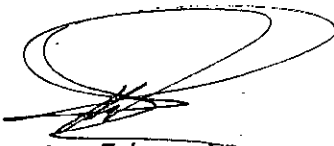
GROUNDS.

- A. Incorrect. Relates to respondents No. 1 & 2.
- B. Incorrect. Respondents No. 3 is not principal respondent in the subject case.
- C. No comments. Pertain to record.
- D. No comments. Relates to respondent No. 1 & 2.
- E. As explained in para -D above.
- F. Respondents are also seeks permission to advance the grounds and proofs at the time of arguments.

Pray.

In the light of above factual position it is humbly prayed that the appeal in hand may very graciously be dismissed having no legal grounds.

Respondent No.3

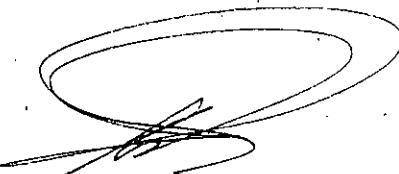


Director Education new
merged Districts

AFFIDAVIT

I, the above respondents, do hereby solemnly affirm and declare, that the contents of the comments are true and correct to the best of my knowledge and belief that nothing has been concealed from this Honorable Court

Respondent No. 3



Director Education
New merged Districts

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL.

SERVICE APPEAL NO. 748/2018

**Mr. Muhammad Hassan SET Technical GHSS Jamrud Tribal
District KhyberAppellant.**

Versus

- 1. Secretary to Govt. of KPK Elementary & Secondary Education
Department Peshawar.**
- 2. Director KPK Elementary & Secondary Education
Department Peshawar.**
- 3. Director Education new merged Districts..... Respondents.**

Parawise Comments on behalf of Respondent No. 3.

Preliminary objections.

- That the Appellant has got no cause of action, locus standi to file the instant Petition.
- That the appeal is not maintainable being devoid of merits.
- That the appellant has concealed material facts from honorable court.
- That the appellant has not come to this Court with clean hands.
- That the appellant case is badly time barred.
- That the appellant is estopped by his own conduct to bring the instant Petition.

Respectfully Shewith.

1. No comments. Pertains to record.
2. No comments. Relates to respondent No. 2. Director Education (new merged Districts respondents No. 3 has no power to interfere in the subject case as all sorts of works all of SET-4S.S/H. are dealt with by Director Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar. It is further stated that priority list is being maintained by Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar, therefore the appellant may approach to Elementary and Secondary Education Department for the redressal of his grievances.
3. Incorrect. Respondents No. 3 has no relevancy with the subject case.
4. Incorrect. Relates to respondents No. 1.
5. No Comments. Hence denied.

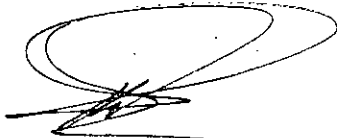
GROUNDS.

- A. Incorrect. Relates to respondents No. 1 & 2.
- B. Incorrect. Respondents No. 3 is not principal respondent in the subject case.
- C. No comments. Pertain to record.
- D. No comments. Relates to respondent No. 1 & 2.
- E. As explained in para -D above.
- F. Respondents are also seeks permission to advance the grounds and proofs at the time of arguments.

Pray.

In the light of above factual position it is humbly prayed that the appeal in hand may very graciously be dismissed having no legal grounds.

Respondent No.3




Director Education new
merged Districts

AFFIDAVIT

I, the above respondents, do hereby solemnly affirm and declare, that the contents of the comments are true and correct to the best of my knowledge and belief that nothing has been concealed from this Honorable Court

Respondent No. 3



Director Education
New merged Districts

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL
PESHAWAR.**

Service Appeal No: 748/2018

Muhammad Hassan SST(G) GHS Sur Kamar, Jamrud Khyber Agency.....Appellant.

VERSUS

Secretary E&SE Department, Khyber Pakhtunkhwa and others.....Respondents

JOINT PARAWISE COMMENTS ON & FOR BEHALF OF RESPONDENTS No: 1-3.

Respectfully Sheweth :-

The Respondents submit as under:-

PRELIMINARY OBJECTIONS.

- 1 That the Appellant has got no cause of action locus standi.
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal in the instant service appeal.
- 4 That the instant Service Appeal is against the relevant provisions of law.
- 5 That the appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the instant appeal is liable to be dismissed for mis-joinder & non-joinder of the necessary parties to the present appeal.
- 7 That the appellant is estopped by his own conduct to file the instant appeal.
- 8 That the instant Service Appeal is not maintainable in the present form & circumstances of the case.
- 9 That the instant Appeal is barred by law.
- 10 That the impugned seniority list dated 01/01/2018 is within legal sphere.
- 11 That the appellant has been inducted against the SET/SST(G) Post vide appointment order dated 06/4/1982 & has passed his B. Ed in 1991, which is the date for the grant of seniority on 16/10/1991 as per rules & criteria by the Respondent Department.
- 12 That the appellant is not entitled for the grant of seniority wef 04/11/1982 as he has been appointed as an un-trained SST in the Respondent Department & has been awarded seniority wef 16/10/1991 after passing his B. Ed Examination.

FACTS.

- 1 That Para-I, is incorrect & misleading on the grounds that as per the impugned seniority list as stood on 01/01/2018, the appellant was appointed against the SET/SST as an untrained SET/SST (M) teacher & he has passed his B Ed examination on 16/10/1991 from where he has been awarded seniority against the said post. Hence, the plea of the appellant regarding his confirmation against the mentioned post on 04/11/1982 is baseless & is liable to be dismissed. **(Copies of the Notification dated 01/01/2018 & final seniority list of the same date are attached as annexure A&B).**
- 2 That Para-2 is also incorrect & denied. The appellant was appointed against the SET/SST post vide appointment order dated 06/4/1982 & has passed his B. Ed on 16/10/1991 from where, the appellant has been regularized against the said post in the Respondent Department in accordance with the mandatory provisions of Section of Civil Servants Act 1973. Hence, the stand of the appellant is baseless & without any cogent reason & justification.
- 3 That Para-3 is incorrect & denied. No Departmental Appeal against the impugned seniority list dated 01/01/2018, has been filed by the appellant to the Respondents. Hence, the said seniority list has got finality in all respect against the appellant.
- 4 That Para-4 is incorrect & denied. The Respondents have acted as per law, rules & criteria for the grant of seniority to the appellant after acquiring the prescribed qualification of B. Ed.
- 5 That Para-5 is also incorrect & misleading. The Respondents have acted as per law, rules & criteria by allowing seniority to the appellant wef 16/10/1991 which is the date of his passing B Ed examination. Hence, the appeal; in hand is liable to be dismissed on the following grounds inter alia:-

GROUND.

- A Incorrect & denied. The impugned final seniority list as stood on 01/01/2018 is legally competent & is liable to be maintained.
- B Incorrect & denied. The stand of the appellant is baseless as he was appointed as an untrained SET teacher vide order dated 04/11/1982 & later on, he has passed his B. Ed examination on 16/10/1991 from where he has been allowed seniority against the said post by the Respondent Department under cited provisions of law, rules & criteria.
- C Incorrect & misleading. The appellant is not entitled for the grant of seniority against the SST/SET post for untrained period & has been made entitled for the grant of the same wef 16/10/1991 on which he has acquired the prescribed qualification of B.Ed.
- D Incorrect & denied. The stand of the appellant is without any cogent proof & justification in view of the foregoing discussion in the instant reply on behalf of the Respondents by allowing seniority wef 16/10/1991 after passing B Ed examination to the appellant against the SET/SST Post in (BPS-16).
- E Incorrect & denied. The stand of the appellant is without cogent reason & justification as the Respondents shave acted as per law & rules by the awarding the seniority to the appellant from his due dated of 16/10/1991 under the relevant provisions of law after acquiring B. Ed qualification.

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F

Legal. However, the Respondents seek leave of this Honorable Tribunal to submit additional grounds/case law & record at the time of arguments on main appeal on the date fixed.


PRAYER

In view of the above made submissions, it is most humbly prayed that this Honorable, Tribunal may very graciously be pleased to dismiss the instant Service Appeal with cost in favour of the Respondent Department.

Dated ___/___/2018

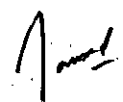

Director
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No: 2)

Director Education (FATA)
FATA Secretariat Khyber Pakhtunkhwa
Peshawar.
(Respondent No: 3)


Secretary
Govt: of Khyber Pakhtunkhwa,
E&SE Department Peshawar
(Respondent No: 1)

AFFADIVIT

I, Hameed ur Rehman, Asstt: Director (Lit: II) Directorate of E&SE Department Khyber Pakhtunkhwa, Peshawar is hereby solemnly affirm & declare on oath that the contents of the instant Joints Parawise Comments are true & correct to the best of my knowledge.


Deponent

Directorate of Elementary and Secondary Education

Khyber Pakhtunkhwa Peshawar

PH No. 091-9210989, 9210938

9210427, 9210957, 9210468

Fax 091-9210936

E-mail ruji_1851@yahoo.com



ANN

21
A

NOTIFICATION

NO. SO(S/M)E&SED/4-24/2014/ESL

(MB-16)

In exercise of powers conferred under Sub Section (i) of Section-8, of the Khyber Pakhtunkhwa Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVII of 1973) the Final Seniority List of SSFs (M) MB-16 of Elementary & Secondary Education Department Corrected upto 05.01.2018, is hereby notified for information of all concerned.

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Dist: No. L-10-96 File No. 7/38/ESL/B-16 SSI (M)

Dated Peshawar the 01 of 01 /2018.

Copy forwarded to the:-

1. Director Curriculum & Teacher Education Khyber Pakhtunkhwa, Abbottabad.
2. Director Education FAZ, Khyber Pakhtunkhwa, Peshawar
3. Director PITE Khyber Pakhtunkhwa, Peshawar
4. All District Education Officers (M) in Khyber Pakhtunkhwa
5. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department.
6. P/A to Director E&SE Department Khyber Pakhtunkhwa.
7. The Deputy Director (MISE), E&SE Department, with the request to upload the requisite Seniority List of E&SE Department website (www.kpese.gov.pk).
8. Master File

Dy. Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

1/1/18

10/11/94

25

MINISTRY OF EDUCATION, TECHNICAL AND COMMERCE OF PAKISTAN WAS CREATED IN 1975

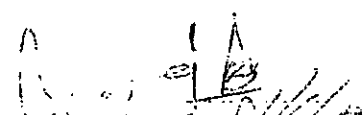
S.No	Name and Qualification	School/Office	Year of B.Ed	Date of Birth	Domestic	Date of Issr Appointm Edu Deptt;	Date of Appointm/Appro of SET	Remarks
1	2	3	4	5		6	7	8
1	MR. MAJED SST (TECH) MA MED (AGRIC TECH)	GMS CHAH MALWANA D.I KHAN	1988	08.01.1965	D.I KHAN	09.03.1988	09.03.1988	
2	MUHAMMAD AYUB SST (TECH)	GMS NO.1 D.I KHAN	1988	20.10.1963	D.I KHAN	15.12.1985	29.03.1988	
3	MR. IZAJEED GUL SST MA EDUCATION	GHS BACH BAN PURA AKORA KHAI SAR	1989	26.02.1960	NOWSHERA	18.1982	12.11.1990	
4	ZAKIR ULLAH SST (TECH)	GHS BAGHDADA MARDAN	1990	02.01.1964	MARDAN	27.12.1990	27.12.1990	
5	ISRAJ KHAN SST TECHNICIAN	GHS TAKHT BHAI MARDAN	1988	30.11.1959	MARDAN	17.01.1991	17.01.1991	
6	MUHAMMAD HASSAN SST (TECH)	GHS SUR KAMAR KHYBER AGENCY	1991	16.05.1959	NWA	06.04.1982	16.10.1991	
7	MUHAMMAD SALEEM SST (TECH)	GHS NO.1 MINGOKA SWAT	1991	06.05.1960	SWAT	16.5.1982	16.10.1991	
8	(TECH)	GHS NO.1 HARIPUR	1991	06.01.1962	HARIPUR	26.09.1983	16.10.1991	
9	(TECH)	GHS NO.1 BANNU	1991	12.04.1963	FR BANNU	15.10.1991	15.10.1991	
10	MURAT ALI SIDDIQISMAN WARI SST (TECH)	GHS NO.2 BANNU	1991	08.04.1964	FR BANNU	15.06.1985	16.10.1991	
11	MUHAMMAD ABDUL KHALID BAKHSH MA B.ED	GHS KURKAT DI KHAN	1992	15.06.1963	DI KHAN	14.11.1987	14.12.1992	
12	MUSAWI AHMAD SIDDIQI MUHAMMAD SST MA B.ED	GOVT. SHARIFED RIZWAN SARTER HIGHER SECONDARY SCHOOL UTMANZAI CHARSADDA	15.04.1993	01.04.1965	MOHMAND AGENCY	09.03.1987	15.04.1993	
13	MR. HIDAYAT ULLAH SST MA MED	GHS DABLI LAWAGHAR KARAK	29.04.1993	03.03.1966	KARAK	07.04.1988	29.04.1993	FCREGONE PROMOTION
14	MR. SHADIR AHMAD SST MA B.ED	GMS ABBOTTABAD	1993	10.6.1964	HARIPUR	23.09.1985	07.09.1993	
15	MR SALIM KHAN, SST BSC.B.ED	GMS DASHKA SWA	5.3.1994	15.09.1961	SWA	11.3.1987	05.03.1994	
16	MR SHAH JEHAN, SST	GHS MOHANDARI, MANSEHRA	5.3.1994	22.10.1961	MANSEHRA	23.11.1989	05.03.1994	
17	GUL FARAZ SST MA B.ED	GHS SHAHRAZ KHIFI TAKKI MARWAT	8.5.1994	8.3.1964	FATA	11.3.1990	08.05.1994	
18	MR ZAHID HUSSAIN, SST	GHS NO.2, TANGI CHARSADDA	8.5.1994	7.5.1960	CHARSADDA	10.12.1989	08.05.1994	
19	MR. YOUSAF KHAN MA B.ED	GHS MANKIAL SWAT	8.5.1994	10.7.1966	SWAT	12.12.1989	10.11.1994	
20	MR NAZIR SHAH SST BA B.ED	GHS MALANGAI BAJOUR AGENCY	8.5.1994		FATA	29.06.1989	10.11.1994	
21	MR MUHAMMAD HANIF		1994			10.11.1994	10.11.1994	
22	MR MUHAMMAD AWAIS	GHS HAAWAI	1994	24.03.1963	ABBOTTABAD	29.05.1989	10.11.1994	
23	MR ASGHAR KHAN		1994			10.11.1994	10.11.1994	
24	MR MUHAMMAD TAHIR		1994			10.11.1994	10.11.1994	
25	MR ZAHIDULLAH SST BA B.ED	GHS MOHAMMAD KHEL NWA	1994		FATA	10.11.1994	10.11.1994	
26	MR SABIR REHMAN		1994			10.11.1994	10.11.1994	
27	MR SAID ALI BAKHASH		1994			23.10.1986	10.11.1994	
28	MR MURSHAK SHAH SST	GHS YOUSAF KHEL MOH.AGY	1994	1.9.1966	MOHMAND AGENCY	15.11.1994	10.11.1994	
29	MR SHAMSHER KHAN MA B.ED	GHS HAKIM KHAN BANNU	1994	1.2.1962	BANNU	10.3.1993	10.11.1994	
30	MR ALTAH HUSSAIN BA B.ED	GHS NATHIA GALI A ABAD	1994	5.3.1963	ABBOTTABAD	1.10.1983	10.11.1994	
31	MR INAMULLAH MISC.B.ED	GHS JALBAI SWABI	1994	2.3.1965	SWABI	10.11.1994	10.11.1994	
32	MR SAIFUR RAHMAN		1994			10.11.1994	10.11.1994	
33	MR KHALID DAD KHAN	GHS RAGHI KALLAN NWA	1994	14.03.1970	FR BANNU	10.11.1994	10.11.1994	
34	MR NAZIR MUHAMMAD BSC.B.ED	GHS WANDA AURANGZEB	1994	4.8.1964	BANNU	10.11.1994	10.11.1994	
35	MR KHALID RAHMAN		1994			10.11.1994	10.11.1994	
36	MR SOHAIL KARIM		1994			10.11.1994	10.11.1994	
37	MR ARSHAD		1994			10.11.1994	10.11.1994	

10/11/94

Sl. No.	Name	Service	Year of Joining	Date of Birth	Qualification	Date of Appointment	Appointing Authority
5105	MUHAMMAD SHAIQ NISAN M.A.M.F	GHS DHEENDHA	2011	12.6.1965	HARIFUR	17.09.1985	33.01.2012
5106	MUHAMMAD ASHRAF SST BA BED	CHIAHL MANSEHRA	2008	14.04.1969	MANSEHRA	08.05.1999	08.03.2012
5107	MUHAMMAD DASHIR SST MA BED	MANSEHRA	2008	02.03.1979	MANSEHRA	17.03.2012	17.03.2012
5108	FAZAL WAHID SST MA BED	BUNER	2008	17.08.1975	BUNER	17.03.2012	17.03.2012

CERTIFICATE:

It is certified that the Seniority List is Final, Undisputed & not Subjective in any Court.


 Deputy Director (Estab)
 E&SE Khyber Pakhtunkhwa
 PESHAWAR
 1/1/2018

No. 5293 IC/Chashma Flour Mills dated Miranshah the 31/12/2008.

From: The Political Agent,
North Waziristan Agency,
Miranshah.

To: The Additional Chief Secretary,
FATA Secretariat Warsak Road,
Peshawar.

Subject: REQUEST FOR COMPENSATION/PROTECTION
OF LIFE & PROPERTY.

Memorandum.

Kindly refer to Section Officer Narcotics, Law & Order Department FATA Secretariat Peshawar letter No.CS(F)/N/10/Comp: NW(A.66)-66, dated 06.12.2008 on the subject cited above.

Facts are that Chashma Flour Mills Miranshah was established in the year 1993 under license No.870/93, dated 8.11.1993 by Haji Muhammad Rafique S/O Malik Haji Jabbar Khan Daur Miranshah Tehsil Miranshah. It was functioning smoothly when in the year 2004 vide No 765/9131, dated 19.6.2004 it was served with a notice by Assistant Manager (Revenue) Operation TESCO FATA Bannu that an amount of Rs.193870/- is outstanding against the Mills which was to be deposited by the end of June 2004. Applicant did not give any heed to the notice and remained engaged in litigations at various Forums. Resultantly TESCO authorities had to disconnect power supply to the said Mills.

An enquiry comprising Agency Accounts Officer, Miranshah, (Chairman), Assistant Director LG & RDD Miranshah (Member) and Superintendent PA's Office Miranshah (Member) was constituted vide No.457-62/APO/MRN, dated 6.5.2004 which gave its findings vide No.914, dated 27.10.2004 and determined an amount of Rs.4651521/- as unpaid bills liable to be deposited by the proprietor of Chashma Flour Mills. Copies of enquiry report attached for perusal.

Then applicant Mr. Muhammad Rafique moved FCR Tribunal NWFP Peshawar for relief against the TESCO dues and the case is

pending adjudication. The original case file have been sent to the Registrar Tribunal FCR NWFP Peshawar vide No.295/APO/MRN, dated 07.7.2007 copy attached for ready reference. Power supply to the Mills remained disconnected due to non-payment of TESCO dues till now.

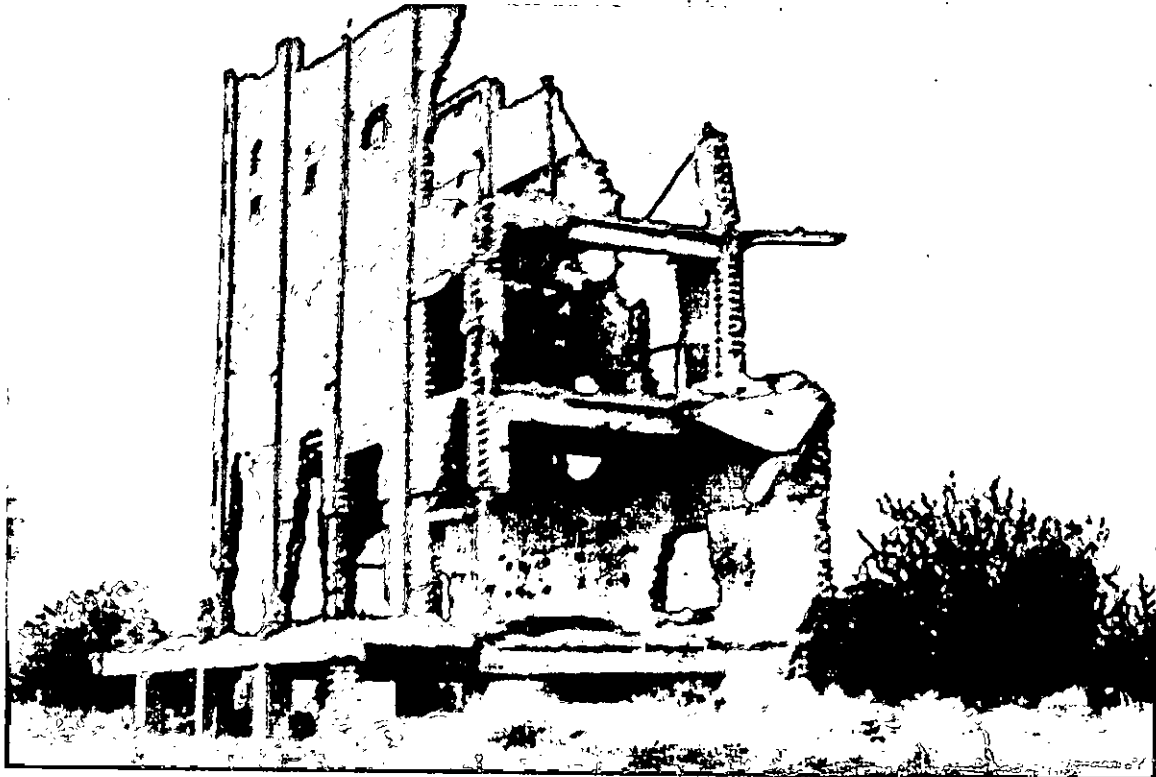
23

As alleged by the applicant that on 25.9.2008 he wanted to operate his Mills and approximately 1100-bags of wheat were lying in the Mills, when violent mob stormed the building and damaged Machinery and fixture etc causing damage of approximately Rs.4000000/- (Rupees, Forty Lacs only) to the applicant/owner. Local administration can not confirm the availability of wheat stored in his Flour Mills as no wheat was allocated to the Mills out of the sanctioned quota. However, the building has been damaged, may be, along with Machinery, by the people of Miranshah village. Moreover, the occurrence has taken place in the Tribal Territory and according to REWAJ, the Political-Administration can not take cognizance of

(ii) The reason for the attack was that the owner of Chashma Flour Mills Malik Jabbar Khan, Father of Muhammad Rafique (applicant) was claiming the ownership of landed property known as Match Factory area (unsettled) whereas the people of Village Miranshah were considering the said land to the property of entire quom of village Miranshah. The applicant's family was reluctant to allow the distribution of land Match Factory area, while the people of Miranshah are of the view that the Chashma Flour Mills has been built on disputed land. The issue has divided the people in to two groups i.e. Daur Miranshah Group and Matchas group. The issue is still un-resolved and various Jirgas have been held by the elders of area but no fruitful results have been achieved.

Submitted please.

Political Agent,
North Waziristan Agency,
Miranshah.



2008 کے بعد

چشمہ فلور علیہ میدان
شمالی وزیرستان ایجنسی



2016 دس

گورنمنٹ ہسپتال
شمالی وزیرستان ایجنسی

GOVERNMENT OF NWFP,
FINANCE DEPARTMENT.

Dated Peshawar, the 31st March, 1988.

From:

The Secretary to
Government of NWFP,
Finance Department,
Peshawar.

TO:

- 1- All Administrative Secretaries to Government of NWFP.
- 2- All Commissioners of Divisions in NWFP.
- 3- All Heads of Attached Departments in NWFP.
- 4- All Deputy Commissioners/Political Agents/
District and Session Judges in NWFP.
- 5- The Registrar, Peshawar High Court, Peshawar.
- 6- The Secretary to Governor, NWFP.
- 7- The Secretary, Public Service Commission, NWFP.
- 8- The Registrar, Services Tribunal, NWFP.

SUBJECT: REDESIGNATION OF THE POSTS OF ASSISTANT WORKSHOP
INSTRUCTOR AND WORKSHOP INSTRUCTOR AS J.E.T(TECH.),
AND S.E.T.(TECH.) IN THE EDUCATION DEPARTMENT.

Sir,

I am directed to refer to the above noted subject and to state that the Schedule enumerated in this Department Circular letter No. FD(SR.I)2-45/75, dated 25.5.1987 may be read as under.

EDUCATION DEPARTMENT:

Sl. No.	Name of Post.	Existing RNPS.	B.P.S.
1-	Assistant Workshop Instructor (to be redesignated as Jr. English Teacher(Tech.)).	i) RNPS-8 ii) 30% of the Cadre strength to be in RNPS-11 on regular basis w.e.from 1.7.1982.	B-9 with Selection Grade equal to 1/3rd posts in B-12.
2-	Workshop Instructor (To be redesignated as Senior English Teacher(Tech.)).	i) RNPS-14 ii) 30% of the Cadre strength to be in RNPS-16 on regular basis w.e.from 1.7.1982.	B-15 with Selection Grade equal to 1/3rd posts in B-17.

Your obedient servant,

E

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03-07-94

Government of NWFP
Education Department

Notification

No. So(S)6-8/90 CT. In pursuance of the provisions contained in sub-rule (2) of rule 3 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer Rules, 1989, the Education Department, in consultation with Services and General Administration Department and the Finance Department, hereby directs that in this Department Notification No. Agri Tech/1-14/81 Rules C.T, dated 28.12.1983, the following amendments shall be made namely:-

AMMENDMENTS:

In the appendix:-

- (a) In column 2 against serial No.2, or the words Vocational Subject Teachers", the words "Senior English Teacher (Technical)/workshop Instructor, shall be substituted; and.
- (b) In column 3, against serial No.2(), for the existing entries, the following shall be substituted, namely;
 - (a) B.Tech. from a recognized University/Institute;
 - OR
 - (b) Secondary School Certificate from a recognized Board with:-
 - (I) Post-Matric Diploma polytechnica Institute/equivalent qualification of Industrial Arts plus Vocational Teachers Govt. Agro- Technical Teachers Training Centre; or
 - (II) Two years certificate in Industrial Arts Education from Government Technical Teachers College, Faisalabad plus two years Diploma in Industrial Arts Education from the Government Teachers Training College, Faisalabad.
 - OR
 - (c) Higher Secondary School Certificate from a recognized board with two years' certificate in Industrial Arts Education from Govt. Technical Teacher Training College Faisalabad, plus Vocational Teachers Training Diploma in Industrial Arts from Government Agro-Technical Teachers Training Centre.

SECRETARY TO GOVT. OF NWFP
EDUCATION DEPARTMENT.

Endst:No.So(S)6-8/90. Dated Peshawar, the 3rd July 1994.

Copy forwarded to the :-

- 1-3. Secretaries to Government of NWFP S&GAD, Finance & Law Department.
- 4. Director of Secondary Education NWFP Peshawar.
- 5. Director of Education (FATA) NWFP Peshawar.
- 6. All Divisional Directors in NWFP
- 7. Manager Government Printing Press NWFP Peshawar.
- 8. Accountant General NWFP Peshawar.

(MUHAMMAD ILYAS)
Section Officers (Schools)

B

10

20-4-88

Directorate of Education,
FATA, N.W.F.P., PESHAWAR.

NOL _____ /Trg/Agro-Tech:

Dated Peshawar the 20/4 1988

To

The Principal,
Government College of Technology,
Peshawar.

Subject:- ADMISSION TO ONE YEAR BACHELOR OF TECHNOLOGY PASS COURSE.
MEMO:

I am directed to forward herewith an application alongwith related documents in respect of Mr. Mohammad Hussain W.I G.H.S, Miranshah (N.W. Agency) for consideration on merit.

[Signature]
Asstt: Director (Trg/Ext),
For/Director of Education,
FATA, N.W.F.P., Peshawar.

Endst: No 16357-57 Trg/

GROUND → B

- 1) ✓ Copy forwarded to the Head Master, G.H.S, Miranshah N.W.A, with reference to his Endst: No. 78 dated 19-4-88 with the remarks that the above noted W.I of ~~the school~~ will not claim for the post after the completion of the course.
- 2) P. A, to D. E. (F A TA), N.W.F.P., Peshawar.

[Signature]
Asstt: Director (Trg/Ext),
For/Director of Education,
FATA, N.W.F.P., Peshawar.

C

11

31-8-88

REGISTERED.

DIRECTORATE OF EDUCATION,
FATA, N.W.F.P. PESHAWAR.

NO. 36547 /A-12/M.Hassan.

Dated Pesh; the, 31/8 /88.

To,

The Headmaster,
GHS, Miranshah, (NWA).

Subject:

GRANT OF STUDY LEAVE.

Ref: your Endst:No. 145 dated 2/8/88.

This is to inform you that training to be undergone by the applicant from the institution of Technology Peshawar is not professional & therefore Mr. Mohammad Hassan WI of your School cannot be granted study leave. He should however apply for earned leave as due and admissible to him under the rules.

The Service Book of the above named teacher is returned herewith.

H.

Encls.

By: Director of Education,
FATA, N.W.F.P. Peshawar.

Encl: S/Book.

RD