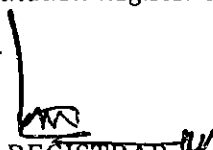




Form- A

## FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 833/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/05/2022	<p>The appeal of Mr. Afsar Ali Shah resubmitted today by Mr. Saadullah Khan Marwat 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>
2-	1-6-2022	<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>20-6-22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>Counsel for the appellant present. Preliminary arguments heard. Record perused.</p> <p>Points raised need consideration. The appeal is 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 submission of reply/comments. To come up for reply/comments on 02.08.2022 before S.B.</p> <p style="text-align: right;"> (Fareeha Paul) Member(E)</p>

Rs-700/-  
Appellant Deposited  
Security & Process Fee  
A. J. J. with  
20/6/22

20.06.2022


16-7-2022

The appeal of Mr. Afsar Ali Shah son of Qamar Ali Shah Laboratory Attendant GHS No. 1 Bannu received today i.e. on 17.05.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Annexures of the appeal may be attested.
- 4- Affidavit may be got attested by the Oath Commissioner.
- 5- Copy of departmental appeal against the impugned promotion order is not attached with the appeal which may be placed on it.
- 6- Annexure-E&F of the appeal are illegible which may be replaced by legible/better one.
- 7- Seven more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1072 /S.T,

Dt. 18-05 /2022

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Saadullah Khan Marwat Adv. Pesh.

Sir,

Re-submitted after removing the  
objections.



**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**S.A. No. 833 /2022

Afsar Ali Shah

versus

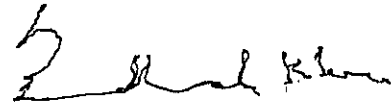
DEO (M) &amp; Others

**SCANNED**  
**KPST**  
**Peshawar****INDEX**

S. No.	Documents Descriptions	Annex	Page #
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3	Appointment order dated 01-12-1993	"B"	7
4	Amendment in Rules dated 18-07-2019	"C"	8-10
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6	Promotion order of R. No. 04 and 05 dated 14-03-2020	"E"	18
7	Representation dated 07-04-2020	"F"	19
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9	Exemption letter from typing test dated 16-04-2021	"H"	23
10	Court order dated 20-04-2022	"I"	24-25

Appellant

Through



Saadullah Khan Marwat  
Advocate  
21-A, Nasir Mansion,  
Shoba Bazaar, Peshawar

Dated 16-05-2022

Ph: 0300-5872676

**BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR**

Appeal No. \_\_\_\_\_/2022

Afsar Ali Shah S/O Qamar Ali Shah,

Laboratory Attendant, GHS No. 01,

Bannu ..... Appellant(s)

**Verses**KP Service Tribunal  
PeshawarCase No. 743Dated 17-05-2022

1. District Education Officer (M),  
Elementary & Secondary  
Education Department,  
Bannu.
2. Director, Elementary & Secondary  
Education Department, GT Road  
Hashtnagri, Peshawar City.
3. Secretary, Elementary & Secondary  
Education Department, Govt. of KP,  
Civil Secretariat, Peshawar.
4. Taj Murad, Junior Clerk Office of  
DEO (M), Bannu.
5. Hameed Ullah Khan, Junior Clerk,  
GHSS Abdul Hameed Noor Jani Khel,  
Bannu ..... Respondent(s)

Filed to-day

Registrar  
17/5/22

⇔&lt;=&gt;⇔&lt;=&gt;⇔&lt;=&gt;⇔&lt;=&gt;⇔

**APPEAL UNDER SECTION 4 OF THE SERVICE  
TRIBUNAL ACT, 1974 AGAINST OFFICE ORDER  
NO. 3371-80 DATED 14-03-2020 OF R. NO. 01  
WHEREBY R. NO. 04 & 05 WERE PROMOTED TO  
THE POST OF JUNIOR CLERKS AND APPELLANT  
BEING SENIOR WAS IGNORED FOR NO LEGAL  
REASON.**

⇔&lt;=&gt;⇔&lt;=&gt;⇔&lt;=&gt;⇔&lt;=&gt;⇔=

**Respected Sir:**

1. That appellant has into his credit the education qualification up to BA. (Copy as annex "A")
2. That on 01-12-1993, appellant was appointed as Laboratory Attendant and is performing his official duties for the last 28 years as such. (Copy as annex "B")
3. That on 18-07-2019, the Government of KP issued Notification where amendment was brought in KP Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 where method of appointment and promotion to the post of Junior Clerk was made / enumerated:
  - a. Forty (40%) by promotion, on the basis of seniority-cum-fitness, from amongst Daftaries, Gestetner, Operators, Qasids and Naib Qasids including holding of other equivalent post in the Secretariat with two (02) years services as such, who have passed FA / F. Sc examination or its equivalent qualification from a recognized Board; and
  - b. 60% by Initial recruitment. (Copy as Annex "C")

Here it would be not out of place to mention that condition of typing skill / knowledge is not applicable for Class-IV seeking promotion to the post of Junior Clerk B-11 against 33% reserved quota.
4. That on 31-01-2020, Final Seniority List of Class-IV for promotion to Junior Clerk in district Bannu was maintained. Name of appellant was figured at S. No. 11, while name of Taj Murad was figured at S. No. 58 appointed on 24-04-1998 and of R. No. 05 Hameed Ullah Khan at S. No. 105 appointed on 30-08-2009. (Copy as Annex "D")
5. That on 14-03-2020, R. No. 04 and 05 were promoted to the post of Junior Clerks against law and rules, being most juniors. (Copy as Annex "E")
6. That on 07-04-2020, appellant submitted representation before R. No. 02 which met dead response. (Copy as annex "F")

7. That on 08-06-2020, appellant then filed Writ Petition before Peshawar High Court, Bench Bannu for setting aside of the impugned Notification order dated 14-03-2020 and to promote him to the post of Junior Clerk. (Copy as Annex "G")
8. That on 16-04-2021, R. No. 03 issued memo whereby it was held that no condition of typing test exists for the promotion of Class-IV employees as per letter dated 26-11-2018 of the Regulation Wing of Establishment Department. (Copy as annex "H")
9. That the said Writ Petition came up for hearing on 20-04-2022 and then the hon'ble Bench was pleased to direct appellant to approach before Service Tribunal in accordance with law. (Copy as annex "I")

Hence, this appeal, inter alia on the following grounds:

**GROUND S.**

- a. That in the seniority list dated 31-01-2020 name of appellant was figured at S. No. 11, while that of R. No. 04 and 05 at S. No. 58 and 105, meaning thereby that appellant is much senior than the promoted respondents.
- b. That method of promotion is enumerated in the rules; seniority-cum-fitness. No reason for non promotion to the appellant was ever given. Thus R. No. 04 and 05 was promoted to the post of Junior Clerk with closed eyes and against the rules.
- c. That extra ordinary favoritism was shown to R. No. 04 and 05 in promotion because the matter was not dealt with as per the mandate of law.
- d. That no limitation ever runs against factum of promotion, seniority and money matter. The promotion of R. No. 04 and 05 was based on favoritism as well as with malafide.

It is, therefore, most humbly prayed that on acceptance of the appeal, order dated 14-03-2020 of R. No. 01 promoting R. No. 04 and 05 to the post of Junior Clerks be set aside and appellant be promoted to the post of Junior Clerk with effect from 14-03-2020 with all service benefits.



Appellant

Through


  
Saadullah Khan Marwat


  
Arbab Saiful Kamal


  
Anjad Nawaz

Advocates

Dated: 16-05-2022

**CERTIFICATE:**

As per instructions of my client, no such like Service Appeal has been earlier filed by the appellant before this Hon'ble Tribunal.


  
Advocate
**AFFIDAVIT**

I, Afsar Ali Shah S/O Qamar Ali Shah, Laboratory Attendant, GHS No. 01, Bannu (appellant), do hereby solemnly affirm and declare that contents of **Service Appeal** are true and correct to the best of my knowledge and belief



DEPONENT

Serial No. 15143

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

15143

# Allama Iqbal Open University

علامہ اقبال اوپن یونیورسٹی



Regn. No. 97-HDU-0023

Roll No. F-3608204



Intermediate Certificate  
(GENERAL GROUP)

انٹرمیڈیٹ سرٹیفکیٹ  
(عمومی گروپ)

This is to certify

تصدیق کی جاتی ہے

that AFSAR ALI SHAH  
son/daughter of QAMAR ALI SHAH

کہ افسار علی شاہ  
بن/بنت قمر علی شاہ

having completed the prescribed requirements is  
awarded this Certificate. The candidate obtained  
C Grade securing 51 % cumulative marks  
and passed the courses given overleaf.

کو مستزہ ضروریات پوری کرنے پر یہ سرٹیفکیٹ دیا جاتا ہے۔ امیدوار  
نے مجموعی طور پر 51 فی صد نمبر لے کر C گریڈ  
حاصل کیا اور پشت پر دیے گئے کورس پاس کیے۔

ISLAMABAD

Date 10TH AUG, 2000.

Controller of Examinations

کنٹرولر امتحانات

THIS CERTIFICATE IS ISSUED WITHOUT ANY CUTTING OR ERASING

PRINCIPAL  
G.H.S. NOI BANNU.

اسلام آباد  
تاریخ: 10 اگست 2000



6

Serial No. 61715

# Allama Iqbal Open University, Islamabad



## TRANSCRIPT

Certified that Mr/Ms AFSAR ALI SHAH  
 Son/Daughter of QUAMER ALI SHAH  
 Registration No. 97 NBU 0023 Roll No. K 4276217 has successfully  
 completed all the requirements of the **Bachelor of Arts (GENERAL GROUP)**  
 programme with the following courses in Semester FIRST AUTUMN 2000 FINAL AUTUMN 2005

Course Code	Title of the Course	Marks	
		Maximum	Obtained
435	FUNCTIONAL ENGLISH	100	44
416	ISLAMIAT	100	61
464	ISLAMIC FIQH-I ISLAMIC FIQH-II	100	50
419	EDUCATION	100	49
436	SEERAT-E-TAYYABA	100	54
437	ISLAMIC STUDIES	100	58
407	HISTORY OF MODERN MUSLIM WORLD	100	59
417	PAKISTAN STUDIES	100	65
404	URDU	100	56

Total Credits AIOU: 8  
 Cumulative Grade Point Average: XXX

Total Marks Obtained: 900 496  
 Percentage of Marks: 55 C

Result Declared On: August 15, 2006  
 Date of Issue: October 30, 2006

Total Credit Hours: XXX

Prepared by: *m/a. d.*  
 Checked by: *[Signature]*

*[Signature]*  
 Controller of Examinations

Note: This transcript is issued, errors and omissions expected, as a provisional document only. Any entry appearing in it does not itself confer any right or privilege independently to the grant of a proper degree which will be issued under the Regulations in due course.

**B 7**

1-12-93

**OFFICE OF THE HEAD MASTER GOVT. JUNIOR HIGH SCHOOL, DANNU CITY**

The following candidates/persons are hereby appointed against the newly created post noted with their names in G.P.-1 (No: 220-26-1110) plus usual allowances in the interest of public services, from the date of taking over charges.

- | No. | Name of candidate  | Post of post | Address    |
|-----|--|--------------|------------|
| 1-  | Ahmed Ali Khan<br>s/o  | Head Master  | Dannu city |
| 2-  | Muhammad Khan<br>Village: Mir Khan-<br>Saladar Mohl (Dannu)                              |              |            |
| 3-  | Muhammad Khan<br>s/o   |              |            |
| 4-  | Muhammad Khan<br>s/o<br>H. Mr. Muhammad Khan<br>Residence: Saladar-<br>Pach Mohl (Dannu) |              |            |
| 5-  | Afsar Ali Sheikh<br>s/o  | Lab          |            |
| 6-  | Qamar Ali Khan<br>Village: Mir Khan<br>(Dannu)   |              |            |
| 7-  | Muhammad Khan<br>s/o<br>H. Shah Mir Khan<br>Residence of Miran,<br>(Dannu)               |              |            |
| 8-  | Muhammad Khan<br>s/o<br>Datto Khan,<br>H/No: 524/1, beside Nayab Datto,<br>Dannu city.   |              |            |

- 1:- The report should be submitted to all concerned.
- 2:- They are directed to produce their health and certificate from the Medical Superintendent, D. Hospital, Dannu.
- 3:- Their age should be under the rules/regulations.
- 4:- NO 2A/11 is allowed to any one.
- 5:- Their services are purely on temporary basis & will be liable to be terminated at any time.

(Signature)  
D. H. S. No. 4, D. H. S.

Order No. 115-2 / Appointed to the post on 01/12/1993  
Copy for information to the...

- 1:- District In-charge (Office) D. H. S., Dannu.
- 2:- District Accounts Officer, Dannu.
- 3:- Candidate concerned.

(Signature)  
D. H. S. No. 4, D. H. S.



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(ESTABLISHMENT WING)

Dated Peshawar, the 18<sup>th</sup> July, 2019

NOTIFICATION

No.SOE.IV(E&AD)/1-35/2014:-

In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Establishment and Administration Department, in consultation with the Finance Department, is hereby directs that in this Department's Notification No.SOE.IV (E&AD)/1-35/2012 dated 6<sup>th</sup> December, 2012, the following amendments shall be made, namely:

AMENDMENTS

In the APPENDIX, for Serial No.4, the following shall be substituted, namely:

1.	2.	3.	4.	5.
4.	Junior Clerk.	(i) FA/ F.Sc with second division or equivalent qualification from a recognized Board; and  (ii) a speed of thirty (30) words per minute in typing.	18 to 30 years.	(a) Forty per cent by promotion, on the basis of seniority-cum-fitness, from amongst Daftaris, Gestetner Operators, Qasids and Naib Qasids including holders of other equivalent posts in the Secretariat with two years service as such, who have passed FA/F.Sc Examination or its equivalent qualification from a recognized Board; and  (b) sixty per cent by initial recruitment.  <b>Note:</b> For the purpose of promotion, there shall be maintained a common seniority list of Daftaries, Gestetner Operators, Qasids, Naib Qasids etc. with reference to the dates of their acquiring the FA/ F.Sc qualification:

1.	2.	3.	4.	5.
				<p>Provided that-</p> <p>(i) if two or more officials have acquired the FA/F.Sc qualification in the same session, the inter se seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post;</p> <p>(ii) where a senior official does not possess the requisite qualification at the time of filling up a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials:</p> <p>Provided further that The condition of FA/F.Sc or its equivalent qualification from a recognized Board, as laid down at clause (a) shall not apply for a period of four years from the date of commencement of this Notification to the existing matriculate incumbents of the post of Daftaris, Gestetner Operators, Qasids and Naib Qasids including holders of other equivalent posts for promotion to the post of Junior Clerk (BS-11)."</p>

*Handwritten mark*

*Handwritten mark*

CHIEF SECRETARY  
KHYBER PAKHTUNKHWA

Copy forwarded for information and necessary action to: -

1. All Administrative Secretaries to Government of Khyber Pakhtunkhwa, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
2. The Senior Member of Board of Revenue.
3. The Principal Secretary to Governor, Governor's Secretariat, Khyber Pakhtunkhwa
4. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
5. The Secretary Provincial Assembly, Khyber Pakhtunkhwa.
6. The Secretary, Khyber Pakhtunkhwa Public Service Commission.
7. Deputy Director (IT), Establishment & Administration Department with the request to upload on the official website.
8. PS to Chief Secretary Khyber Pakhtunkhwa.
9. PS to Secretary Establishment Department,
10. PS to Special Secretary (Estt), Establishment Department.
11. PS to Special Secretary (Reg), Establishment Department.
12. PA to Addl: Secretary (Estt/ Reg), Establishment Department.
13. PA to Addl: Secretary (HRD Wing) Establishment Department.
14. All the Deputy Secretaries in Establishment Department.
15. All Section Officers, Establishment Department, Khyber Pakhtunkhwa Peshawar.
16. The Manager Government Printing Press for publication in the Extra Ordinary Gazette with the request to provide 50 copies of Gazette.

  
(HAZRAT JAMAL)  
SECTION OFFICER (E-IV)

OFFICE OF THE DISTRICT EDUCATION OFFICER

FINAL SENIORITY LIST OF CLASS-IV FOR PROMOTION TO J/CLERK IN DISTRICT BANNU UPDATED 31-01-2020 (Not valid for court)

Name	School/Office	Designation	BPS	D/O/Birth	VO/1st Appointment	Qualification	FA Passing Year
1	MUHAMMAD ALI KHAN	GPS DEGAN KHAAS	2	06-05-65	01-09-89	FA	1985
2	Mohammad Ishaq	GPS Pariz khoni khel	2	08-02-72	29-04-92	FA	11-10-92
3	ABDUL QAYUUM	GPS IMTIAZ KHUJRAM KHEL	2	14-12-1968	01-01-94	FA	01-01-99
4	ABDUL SAMAD KHAN	GPS SABO KHEL ABDUL QAYUM	2	03-01-74	25-04-90	FA	18-03-95
5	Dil Faraz Khan	GHS Bazar Ahmad Khan Bannu	2	10-05-72	11-05-96	FA	1995
6	GUL AJAB NOOR	GPS SHAHBAZ KAKKI NO.2	2	25-02-61	04-11-96	FA	04-03-81
7	Dilabaz Khan	GPS Zabar Dast Mandew	2	19-01-71	04-11-97	FA	1991
8	IRFANULLAH KHAN	GPS JAHANGIR KAKKI	2	09-04-71	09-01-98	FA	01-07-90
9	RAHMAT ULLAH KHAN	GPS WALHI MAMAKHEL	2	09-01-67	16-01-99	FA	26-06-89
10	FARMANULLAH KHAN	GPS MAZANGA LANDIDAK	2	23-03-77	19-07-99	FA	16-01-96
11	Afsar Ali Shah	GHS No.1 Bannu	2	01-12-71	01-12-93	FA	10-08-00
12	MUHAMMAD LIAZ	MUHAMMAD AYAZ	2	15-08-77	18-10-00	FA	1997
13	Ghulam Mustafa Khan	GMS Muhammad Khan Kakki Bannu	2	10-01-80	02-05-01	FA	2000
14	Rifat Ullah Khen	GHS Khujari Babar Bannu	2	03-04-81	18-10-00	FA	19-12-03
15	FALAK NAZ	GHS NO-3 BANNU	2	10-02-78	01-10-96	FA	30-03-05
16	Shahud Ali Shah	GPS PIR SABER SHAH	2	04-01-84	01-01-06	FA	28-01-04
17	Fatih Ullah Khan	GHS Gul Zaman Ghoriwala	2	10-08-85	23-02-06	FA	2005
18	WAHIDULLAH SHAH	GPS GUL SHAHDARAZ KAKKI	2	02-05-83	09-01-06	FA	05-08-06
19	ZAFIRULLAH KHAN	GPS NEKUM KAKKI	2	08-04-84	01-09-06	FA	12-03-05
20	MURAD ALI KHAN	GPS LEWAN DARDARIZ	2	07-06-71	21-12-06	FA	13-05-00
21	Zafran Khan	GPS Bazida yousaf Khan	2	14-04-90	07-08-07	FA	26-06-06
22	MEHRULLAH KHAN	GPS AMIRDAD KHAWAJAMAD LANDIDAK	2	20-04-88	06-03-08	FA	19-02-07
23	HAFIZ HAMID ULLAH	GPS BAYAZ KHAN DARDARIZ	2	05-05-78	10-01-07	FA	10-03-08
24	HamidUllah	GPS Nawazb Khan Mamash Khel	2	12-03-88	29-08-09	FA	2005
25	Muhammad Ibrahim	GHS Bilawar Khan Bannu	2	12-01-78	09-05-96	FA	27-12-08
26	ATTA ULLAH KHAN	GHSS NURAR BANNU	2	14-02-79	10-11-09	FA	30-03-05
27	Sajjad Ali Shah	GPS Ghani Machan Khel	2	01-08-83	17-12-09	FA	21-11-01
28	SARTAJ ALI KHAN	GPS ASLAM KHAN DARDARIZ	2	02-12-92	01-07-10	FA	20-02-01
29	SHAHID KHAN	GPS WALI AYAZ MAD MIR KAKKI	2	03-12-84	19-01-10	FA	21-10-10
30	Kashif Khan	GPS Fazal haq malwana	2	09-01-88	15-04-07	FA	07-03-11
31	Safi Ullah	GMS Hassan Khel Kharaki Bannu	3	06-10-91	11-06-11	FA	21-07-10
32	TAHIR ULLAH	GPS KOT PUSHA	2	08-02-79	12-06-11	FA	13-11-07

	Saad Ullah Khan	GPS Saier Man Maluaw	CHOWKIDAR	2	05-02-70	31-08-06	FA	28-12-11
34	ABDUR RAUF-KHAN	GHSS NURAR BANNU	NAIB QASID	2	05-02-70	31-08-06	FA	28-12-11
35	Nazar Rehman	GPS Sadat madak shah	Chowkidar	2	02-01-76	10-01-12	FA	1994
36	ANWAR ULLAH KHAN	GPS MIR SHAHJAHAN MAMAKHEL	Chowkidar	2	01-04-82	14-02-12	FA	26-07-09
37	Muhammad Riaz Khan	GHS Sikandar Bharat Bannu	N/Q	2	01-05-86	13-07-12	FA	2004
38	MUJAHID KHAN	GPS NAR MANI KHAN	Chowkidar	2	27-02-74	05-03-00	FA	21-07-12
39	ISRAR KHAN	GPS TOOR KHAN MAMA KHEL	Chowkidar	2	22-05-85	10-09-12	FA	29-01-08
40	Nazer Rahman	GPS Sadat madak shah	Chowkidar	2	01-02-76	01-10-12	FA	20-08-93
41	Sarhad Ullah	GHSS Hakim Haved Bannu	N/Qasid	2	15-03-90	09-10-12	FA	26-07-09
42	Muhammad Usman	GHS No.2 Bannu	N/Qasid	2	10-03-92	01-05-10	FA	05-12-12
43	NAJEEB ULLAH KHAN	GPS HAIBAT KHAN MANDAN	CHOWKIDAR	2	15/09/1987	07-12-12	FA	08-10-08
44	Rafidullah Shah	GHS No. 2 Bannu	Lab Attendent	2	28-04-92	20-02-13	FA	2010
45	Amjad Afi Shah	GMS No.2 Bannu	Sweeper	2	07-05-93	01-03-13	FA	28-10-11
46	JAVED ZAMAN	GPS AMIR KHAN BHARAT	Chowkidar	2	23-09-87	05-11-09	FA	04-08-13
47	NASRALI KHAN	GPS HAYAT KAKKI	Chowkidar	2	16-02-69	14-12-87	FA	06-08-13
48	MUNIR SHAH	GPS KOTKA AMBER SHAH	CHOWKIDAR	2	08-08-89	25-10-13	FA	26-07-09
49	SUFIAN KHAN	GPS MIR KABOOT KHOJARY	Chowkidar	2	04-08-95	25-10-13	FA	1990
50	ARIF ULLAH KHAN	GPS ALAM MACHIN KHEL	Chowkidar	2	08-02-93	28-10-13	FA	23-07-01
51	MUHAMMAD FAYAZ	GPS SHEIKH MAHMOOD KAKKI	Chowkidar	2	26-02-87	26-11-13	FA	02-02-06
52	Asif Khan	GHS No.2 B annu	Bearer	2	14-03-87	24-10-10	FA	01-12-13
53	SAAD ULLAH KHAN	GHS NO-1 BANNU	CHOWKIDAR	2	18-04-88	14-03-07	FA	01-12-13
54	Mohammad Javid	GPS Wanda ghafar	Chowkidar	2	04-02-84	26-04-14	FA	17-10-96
55	Salah Ud Din	GPS Garera Shah Jahan	Chowkidar	2	19-04-84	02-05-14	FA	2002
56	ASHRAFULLAH	GHS BAHADAR MANAK KHEL	LJAtt	2	20-03-96	02-07-10	FA	26-07-14
57	ALLAH NOOR KHAN	GPS PIR KHEL KAKKI NO.1	Chowkidar	2	14-03-78	25-11-14	FA	14-03-97
58	Taj Murad Khan	DEO Male Bannu	N/Q / W/C	4	13-03-79	22-04-98	FA	05-08-15
59	Zahid Rahman	GPS Sokari Jabbar No.1	CHOWKIDAR	2	05-03-90	12-02-11	FA	05-08-15
60	Raseol Khan	DEO Male Bannu	Daftari	4	1994	14-10-13	FA	06-10-15
61	ZAI UR REHMAN	GPS NAR NAJEEB	Chowkidar	2	25-04-80	21-11-15	FA	1999
62	KHALID KHAN	GPS BABI KHAN DARDARIZ	Chowkidar	2	20-10-83	21-11-15	FA	30-07-13
63	Hizb Ullah	GPS Khan Zaman Nurar	Chowkidar	2	01-10-92	21-11-15	FA	2013
64	FARID ULLAH	GHSS PAINDA KHEL BANNU	LAB ATTENTDENT	2	14-08-94	21-11-15	FA	2014
65	ASHRAF ULLAH KHAN	GPS DIL NWAZ BHARAT	Chowkidar	2	14-06-84	22-11-15	FA	10-08-07
66	Izaz Rahman	GPS Amir Mukhtiar Ialozai	Chowkidar	2	15-04-95	07-01-16	FA	29-07-13

70	Qaiser Ali Khan	GPS BAKERAY BHARAT	CHOWKIDAR	2	13-03-89	24-02-16	FA	08-10-07
71	Rakif ullah	GPS BULAND BAIST KHEL	CHOWKIDAR	2	02-03-79	25-02-16	FA	18-10-07
72	Rifat Ullah Khan	GPS Koti sadat No 2	CHOWKIDAR	2	29-03-95	25-02-16	FA	22-03-00
73	Siraj Khan	GPS Seru Bada Khel	Chowkidar	2	30-08-92	27-02-16	FA	08-12-14
74	Aurangzeb Khan	GPS Fariq Ismail Khani	CHOWKIDAR	2	20-04-76	05-03-16	FA	08-10-07
75	Sanauallah Khan	GMS Jahangi Lalozei Bannu	CHOWKIDAR	2	15-05-90	10-03-16	FA	26-05-96
76	MUJEEB REHMAN	GMS Muhammad Khan Kakki Bannu	Sweeper	2	07-04-91	30-05-16	FA	09-09-13
77	Shah Riaz Khan	GPS ZEBA KHEL KHOJARY NO.1	N/Qasid	2	12-05-93	04-06-16	FA	26-07-09
78	Wahidullah	GPS Rushan Dad Kachkot	Chowkidar	2	04-10-94	04-06-16	FA	2012
79	Nematullah shah	GPS Degan shsh jalal	Chowkidar	2	15-04-86	06-10-16	FA	06-08-13
80	GHWSULLAH JAN	GPS Koti sadat No 1	Chowkidar	2	01-03-84	31-10-16	FA	2014
81	MUHAMMAD IBRAR KHAN	GPS RAQIB BHARAT	Chowkidar	2	25-10-90	31-10-16	FA	26-06-05
82	Noor Afzal Khan	GPS HASSAN KHEL KHAIRAKI	Chowkidar	2	05-10-89	16-02-17	FA	16-04-12
83	Safid Khan	GPS Pak ismail khel	Chowkidar	2	15-08-91	25-05-17	FA	12-01-10
84	IMDAD ULLAH KHAN	GPS Mosa khel baram	Chowkidar	2	25-03-92	06-04-17	FA	11-05-11
85	ALAM ZEB KHAN	GPS NAR SHERMAST	Chowkidar	2	05-03-91	25-10-13	FA	07-06-17
86	Taza Khan	GPS NAWAB KHAN DARDARIZ	Chowkidar	2	02-01-91	08-08-17	FA	11-07-17
87	IZAZ ULLAH KHAN	GHS Bizan Khel Bannu	Chowkidar	2	25-03-96	08-08-17	FA	14-12-11
88	Rahman Ullah Khan	GPS MASTER LEWAN DRADARIZ	Chowkidar	2	06-12-87	03-01-11	FA	04-08-17
89	Muhammad Ibrahim	GPS Babar Issaki	Chowkidar	2	04-05-88	22-12-17	FA	20-12-17
90	ZIA UL ISLAM	GHSS Hakim Haved Bannu	CHOWKIDAR	2	10-03-85	28-12-17	FA	27-05-09
91	Sharifullah	GPS KHUJARY KHAASS	W/C	2	30-03-90	28-12-17	FA	12-08-05
92	UMER SARFARAZ KHAN	GHS Ismaili Mama Khel Bannu	Chowkidar	2	15-05-97	28-12-17	FA	26-07-09
93	Kashif Khan	GPS FAIZ TALAB ABBAS NO 1	Sweeper	2	25-01-87	11-10-07	FA	22-12-17
94	Amir Ullah Khan	GPS Jameel Khan Nurar	CHOWKIDAR	2	06-07-77	12-07-12	FA	01-01-18
95	IHSAN ULLAH	GHS No.2 Bannu	Chowkidar	2	02-04-92	28-12-17	FA	13-07-18
96	MUHAMMAD BILAL	GPS NO 2 GHORIWALA	Chowkidar	2	10-04-92	18-01-19	FA	02-08-18
97	WEQAR KHAN	GPS GUL BAZ KHAN MANDAN	Chowkidar	2	15-03-84	04-03-01	FA	01-01-18
98	Ikrmullah	GPS LAR KILLA SELANI	CHOWKIDAR	2	30/03/1995	14-10-17	FA	19-02-19
99	Abdullah Khan	GPS Fatmakhel	Chowkidar	2	02-04-99	22-02-17	FA	30-07-19
00	Abed Ullah Khan	GPS NO 2 BANNU	Chowkidar	2	27-03-87	21-11-15	FA	30-07-19
01	Abid Ullah Khan	GHS Ganji Daud Shah Bannu	CHOWKIDAR	2	06-01-86	09-02-19	FA	10-09-19
		GHS Kinger Jan Bahader Bannu	CHOWKIDAR	2	20-01-75	08-07-18	FA	23-05-19
			CHOWKIDAR	2	14-03-98	22-07-19	FA	1995
							DAE	2013

LAB ATTE

FA



102	Sharif Ullah Khan	GHS Ismaili Mama Khel Bannu	Sweeper	2	14-07-87	01-04-08	FA	2018
103	Aftab Ali Khan	GHS Shami Shai Khel Bannu	N/Qasid	2	07-04-95	05-06-16	FA	2018
104	Nafid Ullah Khan	GHS Shami Shai Khel Bannu	Lab: Attend	2	12-12-83	15-11-06	FA	2016
105	HAMEED KHAN	GPS NAWAB KHAN MAMASH KHEL	CHOWKIDAR	2	12-03-88	30-08-09	FA	2016
106	SHAH FAISAL	GPS.CHE GARHI MAMASH KHEL	CHOWKIDAR	2	15-02-92	25-10-13	FA	2016
107	REHMAN ULLAH KHAN	GHSS DILASA KHAN MANDEW BANNU	CHOWKIDAR	2	07-06-95	02-09-14	F.A	2016
108	IBRAR KHAN	GHS KHAN ZAMAN NURAR BANNU	SWEEPER	2	01-02-86	01-01-09	F.A	2015
109	Zahid Ullah Khan	GMS Sakhi Sarwar Mandew Bannu	N/Qasid	2	27-04-89	08-12-09	FA	2015
110	MUHAMMAD AFAQ KHAN	GPS AMANDI SHEIKH AMIR	CHOWKIDAR	2	30-03-97	25-02-16	FA	2015
111	Abid Rahman	GPS Hindi Khel Bannu	N/Qasid	2	10-01-81	27-03-17	FA	2015
112	Syed Noor Jahan Shah	GMS Shahdew Bannu	N/Qasid	2	05-02-96	14-10-17	FA	2015
113	SULAIMAN KHAN	GHS KAKKI BANNU	CHOWKIDAR	2	25-03-96	14-10-17	DAE	2014
114	SUFYAN SAMEEN	GHS MANDAN BANNU	NAIB QASID	2	25-01-94	22-11-13	FA	2013
115	NASIR KHAN	GHS KAKKI BANNU	NAIB QASID	2	20-03-96	05-06-15	FA	2013
116	Nasir Khan	GMS Asad Khujari Bannu	N/Qasid	2	05-05-94	04-06-16	DAE	2013
117	WAQAS Khan	GHS S.K.Bala Bannu	CHOWKIDAR	2	29-03-96	25-05-17	FA	2013
118	Zakir Ullah Khan	GHSS Lalozai Bannu	Lab Attendent	2	04-05-94	23-01-14	FA	2012
119	FARHAD KHAN	GHS KAKKI BANNU	CHOWKIDAR	2	13-04-84	03-10-06	FA	2011
120	Umar Ayaz Khan	GPS Sakhi Sarwar Mandew	Chowkidar	2	20-11-77	21-06-07	FA	2011
121	Hadayat Ullah	GHS Mira Khel Bannu	CHOWKIDAR	2	28-02-92	04-06-16	FA	2011
122	Adnan Khan	GMS Bazida Yousif Khan Bannu	CHOWKIDAR	2	07-09-88	03-2016	FA	2010
123	AURANG ZEB KHAN	GMS JAHANGIR LALZOAI BANNU	SWEEPER	2	07-04-91	30-05-16	F.A	2009
124	Muhammad Ismail Khan	GHS Bazar Ahmad Khan Bannu	Sweeper	2	07-05-87	13-03-15	FA	2007
125	Attaullah Khan	GHSS NURAR BANNU	N/Qasid	2	14-02-79	11-11-09	FA	2005
126	Waheed Ullah Khan	GHSS Mamash Khel Bannu	CHOWKIDAR	2	07-11-84	15-06-05	FA	2004
127	Shadman Khan	GHS Sero Bada Khel Bannu	N/Qasid	2	01-11-78	10-01-12	FA	2004
128	HAMEED ULLAH KHAN	GHS KAKKI BANNU	WATER CARRIER	2	01-04-78	24-01-14	FA	2001
129	Iftikhar Khan	GMS Jhando Khel Bannu	Sweeper	2	01-01-82	12-09-05	FA	2016
130	Irfan Ullah Khan	GMS Bazida Yousif Khan Bannu	N/Qasid	2	01-11-85	?	D.om	2003
131	Hadayat Ullah	GHS Ismaili Mama Khel Bannu	Lab Attendent	2	02-05-93	22-11-15	FA	2015
132	Imranullah Khan	GHSS Mamash Khel Bannu	Lab Attendent	2	?	?	BA	?
133	Asghar Ali Khan	GHS Nar Jaffar Bannu	N/Qasid	2	?	?	FA	?
134	Zahoor Anwar	GMS Asad Khujari Bannu	N/Qasid	2	?	?	BA/DIT	?
135	Muhammad Sauad	GPS Pir Fida Jhando Khel Bannu	Lab Attand	2	?	?	BA	?
136	MOHIB ULLAH KHAN	GHSS Shahbaz Azmat Khel Bannu	Lab Attand	2	?	?	FA	?

ULLAH	GPS SHUKURULLAH BERI KHEL	CHOWKIDAR	2	01-01-72	16-09-05	?	?
Younas Khan	GPS GULAN KILLA	CHOWKIDAR	2	08-04-84	09-03-06	FA	?
UR REHMAN	GPS No.2 SHAHBAZ AZMAT KHEL	CHOWKIDAR	2	02-03-73	09-03-06	?	?
Riaz	GPS AMANDI SHAH JAHAN	CHOWKIDAR	2		03-05-06	FA	?
IQBAL	GPS KOTKA JUMA KHAN	CHOWKIDAR	2	06-09-82	09-09-06	?	?
ULLAH KHAN	GPS MIR HASSAN	CHOWKIDAR	2	22-02-81	05-10-06	?	?
at Khan	GPS NUSRAT SHAL KHEL	CHOWKIDAR	2	01-10-68	14-10-06	?	?
JABBAR	GPS NO.1 BAZAR AHMAD KHAN	CHOWKIDAR	2	01-01-62	11-11-06	?	?
ULLAH	GHSS JANI KHEL MALI KHEL BANNU	CHOWKIDAR	2		16-12-06		?
MMAD NISAR KHAN	GPS LANDI KILLA	CHOWKIDAR	2	05-04-83	08-01-07	?	?
AF KHAN	GPS MAMABATI BARAKZAI	CHOWKIDAR	2	18-12-71	03-09-07	?	?
JAN	GPS GATI KILLA BARAKZAI	CHOWKIDAR	2	01-07-80	22-09-07	?	?
NAWAZ KHAN	GPS UMAR GULA WALIGAI	CHOWKIDAR	2	02-12-75	06-10-07	?	?
AD	GPS ZONDA GHAIBI	CHOWKIDAR	2	01-07-74	24-10-07	?	?
AWAZ	GPS KARAB KILLA	CHOWKIDAR	2	07-04-88	08-01-08	FA	?
ULLAH	GPS GULA NOOR BARAKZAI	CHOWKIDAR	2	?	23-03-08	?	?
Ullah Khan	GPS KOTKA AZAD KHAN	CHOWKIDAR	2	05-02-81	12-05-08	FA	?
ULLAH KHAN	GPS Muhammad Khan Gambar	CHOWKIDAR	2	14-01-71	07-06-08	?	?
amas Khan	GPS UMER GUL PATOL KHEL	CHOWKIDAR	2	10-01-82	15-08-08	?	?
Ullah	GPS Haji Daraz Khan	Chowkidar	2	25-03-90	04-01-09	FA	?
SAMAD	GPS EMAL KHEL ESAKI	CHOWKIDAR	2	01-01-83	01-03-09	?	?
AZIZ	GPS WALIZAR KILLA	CHOWKIDAR	2	15-01-88	14-03-09	?	?
RIAZ	GPS MIR ALAM CHASHMAI	CHOWKIDAR	2	01-01-91	13-07-09	?	?
IMAD IBRAHIM SHAH	GPS YAQOOB KHAN DHANDI	CHOWKIDAR	2	12-09-72	14-01-10	?	?
Gul	GPS ZAHIR SHAH AKHUNDAN	CHOWKIDAR	2	02-05-85	23-06-10	?	?
KHAN	GPS No.1 SHAHBAZ AZMAT KHEL	CHOWKIDAR	2	01-01-70	23-06-10	?	?
LLAH	GPS WAZIRULLAH	CHOWKIDAR	2	10-01-83	01-07-10	?	?
ehman	GPS MOINULLAH LANDI JALANDER	CHOWKIDAR	2	01-01-72	24-12-10	?	?
id khan	GPS SOKARI KARIM Khan	CHOWKIDAR	2	01-07-81	11-01-11	?	?
JLLAH	GPS HASSAN KHEL ISAKI	CHOWKIDAR	2	01-06-70	02-02-11	?	?
awaz Khan	GPS KOTKA BILAWAR KHAN	CHOWKIDAR	2	03-02-80	08-02-11	?	?
n Nawaz	GHSS Comp. Bannu	Chowkidar	?	25-03-90	01-06-11		?

172	Arqan Khan	GMS HASSAN KHEL KHERAKI	NAIB QASID	2	06-10-91	11-06-11	FA	?
172	ZARBAT KHAN	GMS No.1 Bannu City	N/Q	2	12-01-11	23-07-11	FA	?
173	Muhammd Gul	GPS TAZA KHAN	CHOWKIDAR	2	01-01-77	17-10-11	?	?
174	Javed Khan	GPS NO 7 BANNU	CHOWKIDAR	2	01-01-86	22-11-11	?	?
175	Wasim Daraz	GPS AZMAT KALA	CHOWKIDAR	2	20-05-80	01-01-12	?	?
176	MUHAMMAD SHOIAB	GPS NO 9 BANNU	CHOWKIDAR	2	10-01-92	10-01-12	?	?
177	Abdul Hubaib	GPS ALIM SHAH	CHOWKIDAR	2	22-03-94	09-02-12	?	?
178	Kemran khan	GHSS Jani Khel Bannu	L/Att	3	?	23-04-12	?	?
179	UMAR GUL KHAN	GPS NO 3 BANNU	CHOWKIDAR	2	01-07-80	13-07-12	?	?
180	AZIM KHAN	GPS PURANA DAUD SHAH	CHOWKIDAR	2	?	08-10-12	?	?
181	Ghayur khan	GPS DHODI KHEL DABAK	CHOWKIDAR	2	10-10-75	09-10-12	FA	?
182	ABDUL SHAKOOR	GPS KARIM KHAN BAIST KHEL	CHOWKIDAR	2	01-02-90	10-10-12	?	?
183	AMIN ULLAH	GPS EACHAKI JANI KHEL	CHOWKIDAR	2	10-08-84	25-10-13	FA	?
184	Asii Khan	GPS SAID NAWAZ TARKHOBA	CHOWKIDAR	2	27-04-87	25-10-13	?	?
185	RASHID ULLAH	GPS GHAREEB ABAD	CHOWKIDAR	2	15-09-95	25-10-13	?	?
186	ANWAR JAMAL KHAN	GPS NUSRAT DAUD SHAH	CHOWKIDAR	2	1984	25-10-13	?	?
187	NEK MAAN ULLAH	GHS JMAL BARLASHTI DAUD SHAH BANNU	?	2	20-08-89	25-10-13	FA	?
188	FARMAN ULLAH	GPS DHANDI WAZIR	CHOWKIDAR	2	22-03-84	26-10-13	FA	?
189	MURTAZA KHAN	GPS GUL-PAYO	CHOWKIDAR	2	07-04-92	29-10-13	FA	?
190	Shah Zeb Nawaz	GPS BAHADER ZAMAN SARDI KHEL	CHOWKIDAR	2	12-03-89	25-11-13	FA	?
191	SHAHZEB NAWAZ	GHSS Comp: Bannu	Chowkidar	2	04-09-95	01-01-14	FA	?
192	MUDASIR NOOR	GHSS (COMP:) NAZIM NASIB NAWAZ ISSAKI SHA	CHOWKIDAR	2	04-09-95	01-01-14	FA	?
193	NAZIF ULLAH	GPS WAZIR ABAD MARGHALI	CHOWKIDAR	2	02-03-89	24-01-14	?	?
194	RAFI ULLAH	GPS IHSAN ULLAH BAIK KHEL	CHOWKIDAR	2	09-01-85	27-05-14	FA	?
195	NAHEED ULLAH	GPS ALAM DIN	CHOWKIDAR	2	12-12-94	27-05-14	?	?
196	Shamroz khan	GPS KAMAR KILLA	CHOWKIDAR	2	22-04-87	11-08-14	?	?
197	Zohaib khan	GPS LAGARAY KALA	CHOWKIDAR	2	1984	18-08-14	?	?
198	UMER SHAH	GPS No.5 SHAHBAZ AZMAT KHEL	CHOWKIDAR	2	02-02-94	23-08-14	?	?
199	Sajid Ali Shah	GPS WEDAN KILLA	CHOWKIDAR	2	01-06-89	01-09-14	?	?
200	ABDUL HAMID KHAN	GPS MASTER ESAKI	CHOWKIDAR	2	04-05-96	13-09-14	?	?
201	IRFAN ULLAH	GPS MUHAMMAD KHALIL MANDAN	CHOWKIDAR	2	15/11/1975	09-10-14	FA	?
202	MUHAMMAD RAHMAN	GPS KOTKA SHANAWAZ	CHOWKIDAR	2	22-06-79	29-11-14	FA	?
203	ZIA UR REHMAN	GPS GUL IMAM	CHOWKIDAR	2	05-03-74	03-12-14	FA	?
204	FIDA ULLAH	GPS RAIDULLAH KHAN WALI NOOR JANI KHEL	CHOWKIDAR	2	02-01-91	12-03-15	FA	?
205	TAHIR ULLAH	GPS MIRDARAZ SARKI KHEL	CHOWKIDAR	2	01-03-96	12-03-15	?	?

AN KHAN	GPS AQLIM KHAN KILLA	CHOWKIDAR	2	05-09-92	15-02-17	FA	?
AM FARID KHAN	GPS GUL JAWAR	CHOWKIDAR	2	15-02-86	15-02-17	?	?
ASHAN	SDEO MALE DOMEL	Naib Qasid	2	20-02-82	28-02-17	FA	?
AIL KHAN	GPS DOGAR UMERZAI	CHOWKIDAR	2	26-03-96	17-05-17	?	?
hid Khan	GPS LADHA KHEL DAUD SHAH	CHOWKIDAR	2	01-01-99	17-05-17	?	?
z khan	GPS Wali Zaman Nurar	Chowkidar	2	20-11-97	25-05-17	FA	?
AMMAD ASIF	GPS KALA KHEL MASTI KHAN	CHOWKIDAR	2	01-01-89	25-05-17	?	?
em Rehman	GPS SHER GHULAM SHERI KHEL	CHOWKIDAR	2	29-03-90	13-07-17	?	?
WALI KHAN	GPS AYUB REHMAN	CHOWKIDAR	2	12-01-76	27-07-17	?	?
IRAN KHAN	GPS LAKKI QAMAR DIN	CHOWKIDAR	2	01-01-82	08-08-17	?	?
on Shehzad	GPS MAMASH KHEL KHAS	CHOWKIDAR	2	07-12-86	22-12-17	FA	?
ammad Yasin khan	GPS NO 1 BANNU	CHOWKIDAR	2	01-04-96	22-12-17	?	?
MULLAH KHAN	GPS No.4 SHAHBAZ AZMAT KHEL	CHOWKIDAR	2	04-08-99	22-12-17	?	?
JYAZ	GPS BAIND KHEL KAKKI	Chowkidar	2	01-07-90	23-12-17	FA	?
IAZ KHAN	GPS GADI TOP	CHOWKIDAR	2	02-08-01	22-07-19	?	?
ammad Masood	GHS SIKANDER BHARAT BANNU	NAIB QASID	2	13-07-12	?	F.A	R.A.Dale
IAN KHAN	GHSS Shabz Azmat Khel Bannu	Lab Attendent	2	15-03-74	01-02-11	DAE	
LID REHMAN	GPS MUSA KHEL VOLIGAI	CHOWKIDAR	2	10-07-83	27-03-04	FA	?

District Education Officer  
(Male) Bannu

"E" 18

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**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BANNU.**  
**PROMOTION ADJUSTMENT ORDER.**

Consequent upon the recommendation by the DPC/DSC Committee, Education Department Bannu, the following Class-IV Govt. Servants Education Department District Bannu, are hereby promoted and adjusted against vacant J/Clerk post, w.e.f the date of taking over charge in the interest of public service, out of 40% promotion quota on the basis of seniority cum-fitness in light of Govt. policy dated 18 July, 2019 on merit basis as per the terms & conditions given below.

S. No	Name & Designation	Place of posting	Adjusted as J/Clerk	Remarks
1.	Taj Murad NQ/WC FA	DEO (M) Office Bannu.	GHS Murib khel Bake Khel Bannu.	Adjusted against J/Clerk vacant post.
2.	Hamid Ullah Chowkidar BA/DIT	GPS Nawab Khan Mamash Khel Bannu.	GHSS Al-Hamid wati Noor jani Khel Bannu.	Adjusted against J/Clerk vacant post.

**TERMS & CONDITIONS.**

1. Their regular basis promotion is issued as per the approval of DPC/DSC on the basis of seniority cum fitness.
2. They will be on probation for a period of one year extendable for another one year.
3. They will be reverted at any time without assigning any reason or notice to their original post if their efficiency is found unsatisfactory.
4. They are directed to join their new assignment within 15 days otherwise it will be presumed that they have xxx their promotion.
5. Their inter seniority on lower post will intact as usual.
6. Charge report should be submitted to all concerned.
7. No TA/DA is allowed.

Sd/-  
**(ATAULLAH KHAN MINAKHEL)**  
DISTRICT EDUCATION OFFICER.  
(MALE BANNU).

Endst: No. 3371-80/post Class-IV staff Dated Bannu the 14-03-2020.

Copy for information and necessary action to the:

1. Director of Elementary & Secondary Education Department, NWFP.
2. Deputy DEO (M) Bannu.
3. SDEO (M) Bannu.
4. District Accounts Officer, Bannu.
5. Principal / Head Master Concerned School.
6. Official concerned for strict compliance and report.

Sd/-  
District Education Officer,  
Male, Bannu

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BANNU

PROMOTION ADJUSTMENT ORDER

Consequent upon the recommendation by the DPC/DSC Committee Education Dept. Bannu, the following Class-IV Govt. Servants Education Department District Bannu, are hereby promoted and adjusted against vacant J/Clerk post, w.e.f. the date of taking over charge in the interest of public service, out of 40% promotion quota on the basis of seniority, cum seniority in light of Govt. policy dated, 18 July, 2019 on merit basis as per the terms & Conditions given below.

SN	NAME & Place of Posting	Adjusted as J/Clerk	REMARKS
01	DESIGNATION Taj Murod N/A DC/MI Office Bannu.	GIS Khanji Khel Bako Khel Bannu.	Adjusted against vacant post
02	Hamidullah Chowkidar Baidit	GPS Nawab Khel Munash Khel Bannu.	Adjusted against vacant post

TERMS & CONDITION

- 1- Their regular promotion is issued as per the approval of DPC/DSC on the basis of seniority cum fitness.
- 2- They will be on probation for a period of one year extendible for another one year.
- 3- They will be reverted at any time without assigning any reason or notice to their original post if their efficiency is found unsatisfactory.
- 4- They are directed to join their new assignment within 15 days, otherwise it will be presumed that they have left to leave their promotion.
- 5- Their seniority on lower post will intact in case.
- 6- Charge report should be submitted to all concerned.
- 7- No TADA is allowed.

(MALE) BANNU  
DISTRICT EDUCATION OFFICER

Under No. 3371-80 (Form IV Staffed) Bannu the 14/03/2020  
Copy for information and necessary action to the

- 1- Director of Education & Secondary Education, Department, W.P.
- 2- Deputy DC/MI Bannu
- 3- SDC/MI Bannu
- 4- District Accounts Officer Bannu
- 5- Municipal Head Master Concerned School
- 6- District (Incentive) for strict compliance to report

DISTRICT EDUCATION OFFICER  
(MALE) BANNU

بخدمت جناب ڈائریکٹر صاحب ایلینڈی اینڈ سینڈری لاجوسٹری  
عنوان - درخواست پیرکے بر خلاف سنیاری لیتا (مستشرق)

جناب عالی!

سزا رشات ذیل ہیں:

نمبر 1- جناب والا۔ درخواست کنندہ مورخہ 1993-12-01 کو لیتا اینڈ سنیاری لیتا

ہوا تھا

نمبر 2- درخواست کنندہ کے اہل اے کا سرٹیفکیٹ 2000 میں حاصل کیا ہے۔

نقل اہل اے سرٹیفکیٹ بمعہ ڈی ایم سی لیا گیا ہے۔

اگر اس کے علاوہ درخواست کنندہ کے اہل اے کا امتحان بھی پاس کیا

نمبر 3- جناب والا سنیاری لیتا میں درخواست کنندہ کو سیریل نمبر 2 پر لیا گیا ہے۔

مقیدہ درخواست کنندہ سیریل نمبر 2 پر آتا ہے

نمبر 4- سنیاری لیتا میں سیریل موجودہ سیریل نمبر 1، 3، 4 درخواست کنندہ سے

جوٹس ہیں۔ چونکہ ان کی لیتاگی اور اہل اے درخواست کنندہ کے

لیتاگی کے بعد ہوئی ہے۔

نمبر 5- جناب والا۔ آپ کی توجیہ دینا اہم فیکٹ کی طرف اشارہ کرتا ہوں۔

آرڈر میں تاج مراد عوامی کتبیں سنیاری لیتا میں نمبر 18 ہے اور

اس کے ساتھ ساتھ آپ کو دوسرا نمبر جس کا نام عبدالستار ہے اس کے

نام سنیاری لیتا میں ہے۔ یہ کتبیں آپ کے آرڈر میں بھی ہوا ہے۔

لہذا آپ کو جاننا ہے کہ سزا رشات ذیل ہیں

سنیاری لیتا کی تفصیح کر کے درخواست گزار کو سیریل نمبر 2 پر

لا گیا ہے۔

میں کوآرڈیشن ہوئی

مورخہ 20-04-07

درخواست گزار

آرڈر نمبر 1448101-90

1111

کریمت خا - ڈائریٹر جنرل ایئر لائنز پاکستان ایئر لائنز کونسل صدر جنرل ایئر فورس  
عمان - درخواست برائے برصغیر سنیار کی لہٹ (مشترک)  
خانیہ علی .

گزارشات ذیل ہیں .

1۔ خا - ماہ 1۔ درخواست کنندہ مورخہ 1983۔ 12۔ 10 کو یہ ایئر لہٹ برائے عمان  
2۔ درخواست کنندہ ایف . اسکا اسپر ٹیکسٹ و معصوم میں سفر کیا ہے ۔  
نقل اینڈ بیس منٹ ٹیکسٹ ڈی ایچ ایم جی ایف کیا ہے ۔  
3۔ ایئر لہٹ 5000 منٹوں کے لئے لیا گیا تھا جس میں سے کچھ لہٹیں  
سنیاری لہٹ میں درخواست کنندہ کو پھر 5 لہٹیں پر رکھی گئی ہیں ۔  
4۔ جبکہ درخواست کنندہ پھر 3 لہٹیں پر آتا ہے ۔  
5۔ سنیاری لہٹ میں پھر 3 لہٹیں موجود ہیں پھر 3 لہٹیں 3000 منٹوں کے لئے  
جو پھر میں پھر 3 لہٹیں کے لئے لینیائی اور این ہے ۔ درخواست کنندہ کے  
لینیائی کے لئے لہٹیں ۔

6۔ خا - والدہ آ - کا فرجہ اور انجم فرجہ کی طرف رہتا ہے ۔  
آرڈر میں تاج مراد ہے ۔ جبکہ سنیاری لہٹ میں سفر کیا ہے ۔  
اور اس میں کچھ ساخنو اور دیگر منڈے جس کا نام ٹیڈ لکھنا ہے  
جس کا نام سنیاری لہٹ میں بالکل ہے ۔ یہی نہیں ۔ لیکن  
اس کا رڈ بھی ہے ۔  
لہذا جب صاحب سے پتہ چلا ہے کہ سنیاری لہٹ کی تفصیل  
کے درخواست گزار کو پھر 3 لہٹیں پر رکھی گئی ہیں ۔

عس شوارش برگی  
مورخہ - 20.04.07

صورتہ گزار  
APR 20 2007

آفسر مشن دلہیت قرمانہ  
11101-1448101-9



92 20 8-6-20



**BEFORE THE PESHAWAR HIGH COURT BENCH/BANNU**

Writ Petition...../2020

1. Afsar Ali Shah S/O Qamar Ali Shah R/O Naseem Akbar Shah Essaki Shaikhan Bannu.
2. Wahid Ullah S/O Mir Jahandad R/O Noghari Mamash Khel Bannu.
3. Falak Naaz Khan S/O Qadar Khan R/O Mohalla Shadi Khan Kakki Taraf Awal Bannu. ....Petitioner

**VERSUS**

1. Government of KPK through Secretary Education Peshawar.
2. District Education Officer (Male) Bannu.
3. Taj Murad Khan junior clerk posted at GHSS Murib Khel Baka Khel Bannu.
4. Hamid Ullah Junior Clerk posted at GHSS Al-Hamid Wali Noor Jani Khel District Bannu.
5. Atta Ullah Mina Khel (Ex-DEO Education Bannu) Mohallah Mina Khel District Lakki Marwat.

..... Respondents

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

Filed Today  
08 JUN 2020  
Additional Registrar

**ATTESTED**  
Peshawar High Court  
Bannu Bench

Respectfully Sheweth,

1. That petitioners are class-IV employees of the respondent Department who are appointed on the post of Class-IV on 01/12/1993, 01/06/2005 and 27/08/1996 having high qualification and high quality service record. (Copy of the appointment order and service book are annexed as A)
2. That according to government policy for appointment of junior clerks 20% quota is reserved from class-IV employees of daftaris and where daftari are not available then common seniority list of Naib Qasid at etc will be appointed on the post of junior clerk with at least 3 year service.(Copy of the appointment policy is annexed as B)
3. That respondent department neglecting the policy of appointment of class-IV to junior clerk despite the fact that a large number post a junior clerk with the

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respondents department and they promoted/appointed Class-IV employee without seniority list although, seniority list is mandatory for promotion/appointment and respondents No.1, 2 are under legal obligation to circulate seniority list in January and after receiving objection from the employees then they will finalize the seniority list and then they appointed/promoted employees. But respondent No.5 before four days the retirement from his service without seniority list/merit list issued illegal promotion/appointment of respondent No.3 & 4 who are most junior from the petitioners who are the nominee of local politician. (Copy of the promotion order is annexed as C)

4. That Petitioner submitted various applications for appointment and for preparation of seniority list for the post of junior clerk but till date no response is given so having no other efficacious remedy for relief the Petitioner invokes the extra ordinarily constitutional jurisdiction inter-alia on the following grounds.

**GROUND:**

1. That Petitioner is not treated according to law, rules and regulations.
2. That Petitioner is not treated according to article 4 and 25 of the constitution.
3. That petitioner has more than 27, 15 & 24 year service and has vested right for appointments on the post of junior clerk.
4. That promotion/appointment of the respondent No.3 & 4 is against law, rules, regulation and service rules, hence reversible.
5. Other grounds will be taken during arguments with the permission of the court.

It is therefore, humbly prayed that on acceptance of instant writ petition respondents may kindly be directed to

a) Declare the office order of respondent No.3 & 4 dated 14/03/2020 Endst No. 3371/80 is void ab-initio illegal against law rules and regulation arbitrary fanciful and colorful exercise of power without lawful authority and in effective upon the right of the petitioner and respondent No.5 may be proceeded under efficiency and discipline rules 2011.

b) To implement the 20% promotion/appointment quota on the post

**ATTESTED**  
M. S. MINER  
Pro-honore High Court  
Bangalore Bench

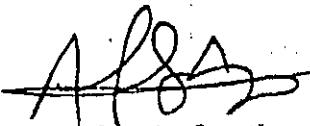
Filed Today  
08 JULY 2020  
A. S. Registrar

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the provincial government and appointed/promoted petitioner on the post of junior clerk.

- c) Direct the respondents to prepare joint seniority list of Class-IV employee and include the name of the petitioners.
- d) Any other relief with this honourable court may deem fit may also be granted.

  
Afsar Ali Shah & others Petitioner

Through Counsel

Masood Ur Rehman Wazir  
Advocate High Court

### INTERIM RELIEF

In wake of above submission appointment/promotion of the respondents No. 3 & 4 may kindly be suspended till the final disposal of instant writ petition.

Afsar Ali Shah & others Petitioner

Through Counsel

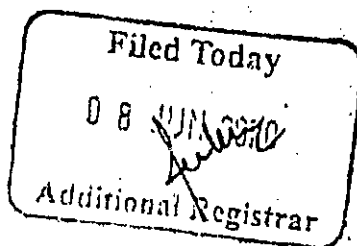
Masood Ur Rehman Wazir  
Advocate High Court

### Certificate


It is certified that no writ petition is filed on the subject matter.

### LAW BOOKS

Constitution of Pakistan 1973.  
Case law per needs.



ATTESTED

  
Additional Registrar  
Bannu Bench

Note: writ falls in the domain of D.B

H 1-68

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16-4-21

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ADMINISTRATION DEPARTMENT

No. E&AD/4(152)/2021/APCA  
Dated: 16-04-2021


The Secretary to Government of Khyber Pakhtunkhwa,  
Elementary & Secondary Education Department

Subject: APPLICATION FOR CLASS-IV PROMOTION AND THE CONDITION  
OF TYPING TEST

Dear Sir,

I am directed to refer to the subject noted above and to state that as per  
advice of Regulation Wing, Establishment Department, no condition of typing test  
exists for the promotion of Class-IV employees. Therefore, instructions contained in  
the letter dated 26-11-2018 (copy enclosed) of Regulation Wing, Establishment  
Department may be followed in its letter and spirit while making promotion of Class-  
IV employees.

Yours faithfully,

  
SECTION OFFICER (ADMIN)  
16/4

A copy is forwarded to the:

1. Section Officer (R-IV), Establishment Department
2. PS to Secretary (Admn), Administration Department
3. PS to Additional Secretary-I, Administration Department
4. PA to Deputy Secretary (Admn), Administration Department
5. Mr. Akbar Khan Mohmand, Provincial President APCA

  
SECTION OFFICER (ADMIN)  
16/4

SOG  
Dm  
16/4-21

20-04-22

**I 24**

**PESHAWAR HIGH COURT,**  
**BANNU BENCH**

FORM OF ORDER SHEET

OF PESHAWAR HIGH COURT  
BANNU BENCH

Date of Order or proceedings	Order or other proceedings with signature of Judge(s).
(1)	(2)
20.04.2022	<p><b><u>W.P No.525-B of 2020</u></b> <b><u>Present:</u></b> Masoodur Rehman advocate for petitioner. Sardar Muhammad Asif Asstt: A.G for the official respondent</p> <p style="text-align: center;">***</p> <p><b><u>SAHIBZADA ASADULLAH, J.---</u></b> The petitioners approached this court by invoking its jurisdiction under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, with the prayer "<i>It is, therefore, humbly prayed that on acceptance of instant writ petition respondents may kindly be directed to:</i></p> <p>a) <i>Declare the office order of respondent No.3 &amp; 4 dated 14.03.2020 Endst: No3371/80 as void ab-initio illegal against law rules and regulation arbitrary fanciful and colourful exercise of power without lawful authority and in effective upon the right of the petitioner and respondent No.5 may be proceeded under Efficiency and Discipline Rules 2011.</i></p> <p>b) <i>To implement the 20% promotion/ appointment quota on the post of junior clerk from Class-IV as per law rules and</i></p>

**ATTESTED**

*[Signature]*  
Peshawar High Court  
Bannu Bench

*regulations of the provincial government and appoint/ promote the petitioner on the post of junior clerk.*

*c) Direct the respondents to prepare joint seniority list of Class-IV employee and include the name of the petitioner.*

*d) Any other relief with this hon'ble court may deem fit may also be granted."*

2. In the comments respondents have submitted that the petitioners were duly considered for promotion, however, having failed in the typing test have become ineligible.

3. In view whereof, we find that petitioners have already been considered and have become ineligible, so their grievance, if any, can be agitated before the Service Tribunal, as bar contained under Article 212 of the Constitution of Islamic Republic of Pakistan, 1973, hit the case of petitioners. In such eventuality, this petition is dismissed, however, the petitioners are at liberty to approach the Service Tribunal in accordance with law.

Announced:  
Dt: 20.04.2022  
\*Azam/P.S\*

(D.B)  
Hon'ble Mr. Justice Ijaz Auwar and  
Hon'ble Mr. Justice Sahibzada Asadullah

CERTIFIED TO BE TRUE COPY

23 APR 2022

Peshawar High Court  
Authorised Under Article 87 of  
The Qanun-e-Shahadat Ordinance 1984

یعدالت چٹائی سرسٹریٹ ٹریڈنگ کمپنی پرائیویٹ لمیٹڈ لاہور

مختراب  
ایڈوکیٹ

آفسر علیاہ  
بناام

دعویٰ  
اپیل

پاؤنڈیشن

© ————— ©

میں نے مذکورہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی شکل کاروائی مستحفاظہ آن مقام لاہور  
کیسٹ کے استعمال آگاس خٹان سے ورنے ایڈوکیٹ، ہائی کورٹ کو وکیل ملنے کے لئے کیا جاتا ہے کہ صاحب  
مذکورہ کو مقدمہ کی کل کاروائی کا کابل اختیار ہوگا نیز وکیل صاحب کو کرنے یا نہیں نامہ و آفیشز ٹالٹ، واپسہ برتاف  
یہ جواب دہی اور قابل دعویٰ اور لٹریچر ڈگری کرنے اجراء اور وکیل چیک و ریپیہ اور مرضی دعویٰ اور درخواست  
ہر قسم کی تعدد ان اجراء میں پرستھ کر لیتے کا اختیار ہوگا نیز لٹریچر عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی  
اور مرضی لٹریچر ڈگری کے اپیل ٹالٹ و لٹریچر ڈگری کرنے کا اختیار ہوگا اور لٹریچر ڈگری کے مقدمہ بند  
کے لئے یا لٹریچر ڈگری کے واسطے اور وکیل یا لٹریچر ڈگری کو اپنے ہمراہ یا اپنی بجائے لٹریچر ڈگری اختیار ہوگا  
اور اس پر مقدمہ کو نہیں وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا سامنے پروا نہیں منقولہ  
قبول ہوگا و دوران مقدمہ میں جو خرچہ و تر جانہ التوا مقدمہ کے سبب سے ہوگا اس کے مستحق وکیل صاحب  
مذکورہ ہوں گے نیز لٹریچر ڈگری کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام روہ  
پر ہو یا مد سے باہر ہو تو وکیل صاحب یا بند نہ ہوں گے کہ پیروی نہ کر کریں۔  
لہذا کالت نامہ دیکھ دیا کہ سند ہے۔

آل رقم ۱۵-۵۵-۲۲

القائد      القاب      القاب

اور باب نیگ اکمال  
ایڈوکیٹ

سید القاب  
ایڈوکیٹ

القاب  
اف علیاہ

محمد  
ایڈوکیٹ