

16.04.2019

Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney present.

Arguments heard. File perused.

During the course of arguments Learned counsel for the appellant admitted that the appellant (PSHT) is not senior to other colleagues of the appellant/promotees mentioned in the impugned promotion order dated 12.10.2017 on the basis of date of first appointment or on the basis of date of birth.

Plea of Learned counsel for the appellant is that since the appellant attained the requisite qualification required for the post of SST (General) prior to the promotees mentioned in the impugned promotion order, therefore, the appellant should not have been ignored while promoting the other colleagues of the appellant. The contention of learned counsel for the appellant is found without any force. Consequently the present service appeal is dismissed in limine. No order as to costs. File be consigned to the record room.



(Muhammad Hamid Mughal)
Member

ANNOUNCED.

16.04.2019

27.12.2018

Learned counsel for the appellant present and seeks adjournment. Adjourn. To come up for preliminary hearing on 01.02.2019 before S.B.



Member

01.02.2019

Counsel for the appellant present and requested for adjournment. Adjourned to 16.04.2019 for preliminary hearing before S.B.



(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

06.08.2018

Mr. Noor Muhammad Khattak, Advocate counsel for the appellant present. Mr. Kabirullah Khattak, Addl:AG for respondents present. Learned counsel for the appellant made a request for adjournment. Granted. Case to come up for preliminary hearing on 17.09.2018 before S.B.

17.09.2018

Clerk to counsel for the appellant present and made a request for adjournment due to general strike of the Bar. Case to come up for preliminary hearing on 18.09.2018 before S.B.


Chairman


(Ahmad Hassan)
Member

18.09.2018

Counsel for the appellant present and made a request for adjournment. Granted. Case to come up for preliminary hearing on 11.08.2018 before S.B.


Member

8-11-2018

*Due to Retirement of Honorable
Chairman the Tribunal is non
functional therefore the case is
adjourned to come up for the
same on 27-12-2018*

*Referee
Kopdar*

13.04.2018

Learned counsel for the appellant present.
Preliminary arguments heard.

Learned counsel for the appellant argued that through the present appeal the appellant (SCT) has made impugned the notification dated 12.10.2017 whereby the appellant was ignored from promotion to the rank of SST (General) despite being senior and fully qualified while most of the junior colleagues of the appellant were promoted; that the departmental appeal of the appellant was not responded.

In view of the submissions of the learned counsel for the appellant, preadmission notices be issued to the respondent department for 04.06.2018 to meet the point that whether the appellant was senior as well as fully qualified at the time of issuance of impugned order or otherwise.


Member

21/04/18

04.05.2018

14/5/18
The Tribunal is non-functional due to retirement of our Hon'ble Chairman. Therefore, the case is adjourned. To come up for same on 29.06.2018.


Reader

29.06.2018

Learned counsel for the appellant present and seeks adjournment. Adjourned. To come up for preliminary hearing on 06.08.2018 before S.B.



Member

Form-A
FORM OF ORDERSHEET

Court of _____

Case No. 348/2018

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|------------|---------------------------|---|
| 1 | 2 | 3 |
| 1 | 09/03/2018 | <p>The appeal of Mr. Inamullah presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to Learned Member for proper order please.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR 9/3/18</p> |
| 2- | 12/03/18 | <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>27/03/18</u>.</p> <p style="text-align: right;"><i>[Signature]</i> MEMBER</p> |
| 27.03.2018 | | <p>Learned counsel for the appellant present and seeks adjournment. Adjourn. To come up for preliminary hearing on 13.04.2018 before S.B</p> <p style="text-align: right;"><i>[Signature]</i> Member</p> |

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. 348 /2018

INAMULLAH (PSHT)

VS ACS (FATA) & OTHERS

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| 6 | Notification dated 24-07-2014 | E | 10 – 16 |
| 7 | Vakalat nama | | 17 |

APPELLANT

THROUGH:



MUHAMMAD MAAZ MADNI

Advocate, Peshawar

0333-9313113, 0314-9965666

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 348 /2018

Khyber Pakhtunkhwa
Service Tribunal

INAM ULLAH, PSHT (BPS-15),
Govt. Primary School, Jan Badshah Khyber Agency.

Diary No. 356
Dated 09-3-2018

.....APPELLANT

VERSUS

- 1- The Additional Chief Secretary (FATA), FATA Secretariat, Warsak Road, Peshawar.
- 2- The Director of Education (FATA), FATA Secretariat, Warsak Road, Peshawar.
- 3- The Agency Education Officer, Khyber Agency at Jamrud.

.....RESPONDENTS

APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST
THE IMPUGNED NOTIFICATION DATED 12-10-2017
WHEREBY THE APPELLANT HAS COMPLETELY BEEN
IGNORED FROM PROMOTION TO THE RANK OF SST
(GENERAL) AND AGAINST NOT TAKING ANY ACTION ON
THE DEPARTMENTAL APPEAL DATED 10-11-2017 OF
APPELLANT WITHIN THE STATUTORY PERIOD

PRAYER:

That on acceptance of this appeal the impugned Notification dated 12-10-2017 may very kindly rectify/modify to the extent of appellant by directing the respondents to consider the appellant for regular promotion to the rank of SST (General) with all consequential benefits. Any other remedy which this august Tribunal deems fit may also be awarded in favor of the appellant.

R/SHEWETH:
ON FACTS:

- 1- That appellant was initially appointed in the respondent Department as PTC now PST vide order dated 03-12-1992 by the respondent no. 3 after fulfilling all the codal formalities required for the post.
- 2- That the appellant is highly qualified having M.Ed Degree along with the relevant qualification required for the post of PST and as such was promoted to the rank of PSHT.

Filed to-day
Registrar

9/3/18

- 3- That right from the date of appointment the appellant is performing his duty quiet efficiently, whole heartedly and upto the entire satisfaction of his high ups.
- 4- That the appellant was also given seniority and accordingly was placed at Serial No. 166 of the Seniority List prepared and maintained for PSHT by the respondents at Khyber Agency. Copy of the Seniority List is attached as annexure A.
- 5- That, the respondent Department issued the impugned notification dated 12-10-2017 where upon most of the colleagues of the appellant was promoted to the post of SST (General) by completing ignoring the appellant from regular promotion. Copy of the impugned order dated 12-10-2017 is attached as annexure B.
- 6- That feeling aggrieved from the impugned Notification dated 12-10-2017 the appellant preferred Departmental appeal which was properly forwarded by respondent no. 3 to Respondent No. 2 vide letter dated 10-11-2017 but no reply has been received so far. Copy of letter & Departmental Appeal is attached as annexure C&D.
- 7- That the appellant feeling highly aggrieved from the inaction of the respondent has no other adequate remedy but to approach this Honourable Tribunal on the following grounds amongst the others:

GROUND:

- A- That the impugned Notification dated 12-10-2017 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be modified/rectified.
- B- That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondent violated article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That it is very much clear from the attached seniority list that the appellant is senior most teacher according to the date of birth and that of first appointment as PST but in spite of that the appellant has completely been ignored by the respondents to be promoted to the post SST (General).
- D- That the respondent department acted in arbitrary and malafide manner by not promoting the appellant to the post of SST (General).

- E- That the respondent Department discriminated the appellant while issuing the impugned Notification dated 12-10-2017.
- F- That, it is pertinent to mention here that the appellant has completed all the requisite qualification required for the post of SST (General) more prior from that of the ones got promoted in the impugned order dated 12-10-2017.
- G- That, the impugned notification dated 12-10-2017 is issued by the respondents in a hasty manner as the respondent have violated their own rule & regulation for the purpose of the matter in question and keeping a combined seniority list. Copy of the notification dated 24-07-2014 is attached as annexure E.
- H- That, despite of clear vacant post available in the home Agency of the appellant the respondents have ignored the appellant from promotion to the post of SST (General).
- I- That, the act of the respondent is against the dictum enshrined in Article 38 (e) of the Constitution of Islamic Republic of Pakistan, that to *“reduce disparity in the income and earning of the individual including persons in different classes in the service of Pakistan”*.
- J- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 28-02-2018

APPELLANT


INAMULLAH

THROUGH:


NOOR MOHAMMAD KHATTAK,

&

MUHAMMAD MAAZ MADNI
Advocates, Peshawar

19
12

PST-

(4)

Annexure - (A)

AGENCY EDUCATION OFFICE KHYBER AGENCY AT JAMRUD

LIST OF PST MALE ELIGIBLE FOR PROMOTION

| Seniority No | Name | F/Name | Qualification | | Designation | BPS | D/O Birth | Domicile | D/O Ist Entry into Govt Service | D/O App: in the Present Post | Place of Posting | D/O Passing of Prof: Exam result/D/O Promotion | Consideration Date | BA Result Declaration Date | B.ED Result Declaration Date | Remarks |
|--------------|------------------|-----------------|---------------|-------------|-------------|-----|------------|----------|---------------------------------|------------------------------|--------------------|--|--------------------|----------------------------|------------------------------|---------|
| | | | Prof : | Acad : | | | | | | | | | | | | |
| 45 | Ali Man Shah | Madi sher | MA | PTC/Bed | PSHT | 15 | 03-04-1962 | Khyber | 10-06-1980 | 10-06-1980 | GPS sher Haider | 25-01-1986 | 25-01-1986 | 31.10.2000 | 22.12.2006 | |
| 78 | Jahan Zeb khan | Khan Badshah | BA | PTC/CT | PSHT | 15 | 02-04-1960 | Khyber | 13-12-1979 | 13-12-1979 | GHS AlamGudar | 29-11-1987 | 29-11-1987 | 10.03.2010 | 04.01.2013 | |
| 99 | saif ur Rahman | Shahbaz Khan | MA | Bed | PSHT | 15 | 01-06-1969 | Khyber | 10-07-1989 | 10-07-1989 | GPS Ogdar dara | 10-07-1989 | 10-07-1989 | 15.01.1994 | 25.12.2004 | |
| 101 | Muhammad Wajid | Rehman gul | MA | PTC/BED | PSHT | 15 | 12-01-1969 | Khyber | 03-09-1988 | 03-09-1988 | GHS Jamrud-2 | 26-08-1989 | 26-08-1989 | 25.05.2000 | 25.01.2007 | |
| 118 | Teka dar khan | Stana Mir | BA | PTC/CT/BED | PSHT | 15 | 03-08-1969 | Khyber | 25-10-1987 | 25-10-1987 | GPS Ali Masjid | 14-11-1990 | 14-11-1990 | 22.02.2011 | 04.01.2013 | |
| 123 | Gul Habib | Ali Mohammad | BA | PTC/Bed | PSHT | 15 | 22-08-1965 | Khyber | 03-09-1988 | 03-09-1988 | GPS Wali Baba | 14-11-1990 | 14-11-1990 | 31.08.2015 | 17.01.2017 | |
| 130 | FAZAL AKBAR | Muhammad Akbar | BA | PTC | PSHT | 15 | 01-02-1970 | Khyber | 07-10-1990 | 07-10-1990 | GPS Redi Gul | 14-11-1990 | 14-11-1990 | 22.11.1999 | 26.07.2005 | |
| 143 | Jan Akbar | Khawja mir | MA | PTC/CT/Med | PSHT | 15 | 03-10-1972 | Khyber | 07-10-1990 | 07-10-1990 | GHS Alam Gudar | 22-10-1991 | 22-10-1991 | 31.03.1997 | 04.10.2002 | |
| 145 | Izat Shah | Qudrat Shah | MA | PTC/CT/Bed | PSHT | 15 | 28-04-1970 | Khyber | 07-10-1990 | 07-10-1990 | GPS Redi Gul | 05-11-1991 | 05-11-1991 | 11.10.2003 | 10.02.2010 | |
| 162 | Abdullah | Adul Qahar | BA | PTC/Bed | PSHT | 15 | 11-03-1972 | Khyber | 25-11-1992 | 25-11-1992 | GPS Zabir Noor | 25-11-1992 | 25-11-1992 | 04.03.1999 | 12.08.2002 | |
| 166 | Inamullah | Hatim Khan | MA | PTC/M.Ed/CT | PSHT | 15 | 01-02-1973 | Khyber | 03-12-1992 | 03-12-1992 | GPS Jan Badshah | 03-12-1992 | 03-12-1992 | 09.04.1997 | 26.05.2005 | |
| 169 | shahab Ud din | Ahmad Jan | MA | PTC/CT/Bed | PSHT | 15 | 01-04-1971 | Khyber | 23-12-1992 | 23-12-1992 | GPS Ghundi Jamrud | 23-12-1992 | 23-12-1992 | 28.04.2000 | 25.01.2007 | |
| 170 | Hidayat Ullah | Inayat Ullah | BA | PTC/Bed | PSHT | 15 | 27-11-1969 | Khyber | 23-12-1992 | 23-12-1992 | GPS Ali shah killi | 23-12-1992 | 23-12-1992 | 04.06.2001 | 26.06.2014 | |
| 172 | Nazar khan | sher Rehman | MA | PTC/CT/Bed | PSHT | 15 | 02-12-1969 | Khyber | 23-01-1993 | 23-01-1993 | GHS Jamrud-2 | 23-01-1993 | 23-01-1993 | 07.03.1996 | 10.02.2010 | |
| 175 | Gul Muhammad | Lal Khan | BA/Bed | PTC/CT | SPHT | 15 | 05-07-1969 | Khyber | 23-01-1993 | 23-01-1993 | GPS Spln Dhand | 25-12-1993 | 25-12-1993 | 22.05.2002 | 13.02.2004 | |
| Seniority No | Name | F/Name | Qualification | | Designation | BPS | D/O Birth | Domicile | D/O Ist Entry into Govt Service | D/O App: in the Present Post | Place of Posting | D/O Passing of Prof: Exam result/D/O Promotion | Consideration Date | BA Result Declaration Date | B.ED Result Declaration Date | Remarks |
| | | | Prof : | Acad : | | | | | | | | | | | | |
| 200 | Tahir khan | Zain khan | BA | PTC/BED | SPHT | 15 | 15-03-1969 | Khyber | 01-01-1990 | 01-01-1990 | GHS Sur Kamar | 29-05-1994 | 29-05-1994 | 12.10.2007 | 04.01.2013 | |
| 209 | Khalil UR Rehman | Razm All | BA | PTC | SPHT | 15 | 25-03-1971 | Khyber | 27-09-1994 | 27-09-1994 | GHS Ghundi | 27-09-1994 | 27-09-1994 | 28.12.1998 | 18.07.2011 | |
| 210 | Baghdadi shah | Biland Shah | MA | PTC/CT/Bed | SPHT | 15 | 10-02-1970 | Khyber | 27-09-1994 | 27-09-1994 | GPS Bara Dara | 27-09-1994 | 27-09-1994 | 02.01.2001 | 10.02.2010 | |
| 221 | Farman All | Razam All | MA | PTC/Bed | SPHT | 15 | 20-02-1968 | Khyber | 19-03-1995 | 19-03-1995 | GPS khan Akbar | 19-03-1995 | 19-03-1995 | 30.08.1994 | 24.02.1999 | |
| 222 | Imran Afridi | Dilshad | BA | PTC/CT | SPHT | 15 | 05-08-1970 | Khyber | 19-03-1995 | 19-03-1995 | GPS Sahib shah | 19-03-1995 | 19-03-1995 | 31.12.1997 | 13.01.2004 | |
| 229 | Irfan khan | Gul Mand | BA | PTC/Bed | PST | 12 | 05-10-1974 | Khyber | 09-09-2002 | 30-09-1988 | GPS Fazal Ahmad | 18-06-1996 | 18-06-1996 | 08.04.2005 | 10.02.2010 | |
| 243 | Samar Khan | Abdul Qayum | MA | PTC/CT/BED | SPHT | 15 | 10-11-1971 | Khyber | 31-10-1996 | 31-10-1996 | GPS Shanki | 31-10-1996 | 31-10-1996 | 08.02.1996 | 25.01.2007 | |
| 244 | Abdul Wadood | Pir Halder | Mcom | PTC/B.Ed | SPHT | 15 | 05.03.1969 | Khyber | 01.11.1996 | 01.11.1996 | GPS Jalal Din No1 | 01.11.1996 | 01.11.1996 | 12.07.1994 | 22.12.2005 | |
| 260 | Noor Rahim | Hakim Khan | MA | PTC | SPHT | 15 | 03-01-1976 | Khyber | 19-09-1998 | 19-09-1998 | GPS Sher Khan | 19-09-1998 | 19-09-1998 | 09.04.1997 | 17.02.2004 | |
| 266 | Attiq Ur Rehman | Ali Rehman | MA | PTC/CT/Bed | SPHT | 15 | 14-04-1974 | Khyber | 19-09-1998 | 19-09-1998 | GPS T.D bazar | 19-09-1998 | 19-09-1998 | 09.04.1997 | 12.01.2008 | |
| 267 | sher Yaz Dan | Gul Jamal | BA | PTC/Bed | SPHT | 15 | 10-02-1973 | Khyber | 19-09-1998 | 19-09-1998 | GPS khan Akbar | 19-09-1998 | 19-09-1998 | 30.05.2001 | 10.02.2010 | |
| 268 | Samin Jan | Karim shah | BA | PTC/BED | SPHT | 15 | 02-01-1979 | Khyber | 19-09-1998 | 19-09-1998 | GPS Shamsher killi | 19-09-1998 | 19-09-1998 | 25.11.2000 | 26.07.2008 | |
| 269 | Haider Khan | Niaz Gul | BA | PTC/Bed | SPHT | 15 | 01-03-1972 | Khyber | 19-09-1998 | 19-09-1998 | GPS Jamrud | 19-09-1998 | 19-09-1998 | 17.03.1994 | 10.02.2010 | |
| 273 | Menhajuddin | Yarbaz Khan | Bcom | PTC/CT/Bed | SPHT | 15 | 15-01-1971 | Khyber | 19-09-1998 | 19-09-1998 | GPS Khurma Tang | 19-09-1998 | 19-09-1998 | 31.05.1994 | 20.02.2002 | |
| 275 | Lal Faqir | Mohammad Saddiq | BA | PTC/CT/Bed | SPHT | 15 | 10-10-1972 | Khyber | 19-09-1998 | 19-09-1998 | GPS Hussain Gul | 19-09-1998 | 19-09-1998 | 24.12.2003 | 26.07.2008 | |

B.Ed

ATTACHED

B.Ed

DTA

Agency Education Officer Ref: _____
 Khyber Agency at Jamrud Dated: _____ / _____ /2017
 Placement

Consequent upon the notification of FATA Secretariat Directorate of Education Khyber Pakhtunkhwa, Warsak Raod Peshawar, Pakistan Endost: No. 15113-60 dated 11/10/2017, the SCTs/CTs, PSHTs/SPSTs/PSTs, SDMs/DMs, SATs/ATs STTS/TTs, of Khyber Agency who whave been promoted to SSTs (Bio-Chem), SSTs (Phy-Maths), SSTs (General) male vide said notification, are placed at the vacant SSTs (Bio-Chem), SSTs (Phy-Maths), SSTs (General) male posts noted against each with immediate effect in public interest.

Placement of SST (Bi/Chem) BPS-16
 (Promoted from SCT/CT)

| S No | St: No | Name | Present place of posting | Placement |
|------|--------|--------------------|--------------------------|--|
| 1 | 91 | Islam uddin | GHS Jaffar Khan | Against the vacant SST (Bio-Chem) Post at GHS Jaffar Khan |
| 2 | 92 | Khan Afzal | GHS Janas Khan | Against the vacant SST (Bio-Chem) post at GHS Janas Khan |
| 3 | 109 | Wasim | GHS Jamrud No. 2 | Against the vacant SST (Bio-Chem) post GHS Jamrud No. 2 |
| 4 | 115 | Illauddin | GHS Ghundi | Against the vacant SST (Bio-Chem) post at GHS Ghunid |
| 5 | 158 | Wahabuddin | GHS Jamrud 1 | Against the vacant SST (Bio-Chem) post at GHS Jamrud 1 |
| 6 | 185 | Shah Muhammad Khan | GMS Shalobar No. 1 | Against the vacant SST (Bio-Chem) post at GHS Jan Khan |
| 7 | 190 | Haji Gul | GMS Sheenki Bara | Against the vacant SST (Bio-Chem) post at GHS Muhammad Khan Kali LKL |
| 8 | 191 | Alif Gul | GHS Kohi Sher Haider | Against the vacant SST (Bio-Chem) post at GHS Kohi Sher Haider |

Placement of SST (Bi/Chem) BPS-16
 (Promoted from PSHT/SPST/PS)

| S No | St: No | Name | Present place of posting | Placement |
|------|--------|-----------------|--------------------------|--|
| 1 | 238 | Bagh e Haram | GPS Azam Din | Against the vacant SST (Bio-Chem) Post at GHS Akhun Talab Bara Khyber Agency |
| 2 | 263 | Muhammad Farooq | GPS Gul Muran | Against the vacant SST (Bio-Chem) post at GHS Sama Ghari Khyber Agency |
| 3 | 409 | Asif Noor | GPS Tood Kamar | Against the vacant SST (Bio-Chem) post at GHS Tood Kamar BZK LKL Khyber Agency |
| 4 | 427 | Said Muhammad | GPS Sher Bahadar | Against the vacant SST (Bio-Chem) post at GHS Madghali Attari |

ATTESTED



Placement of SST (Phy-Maths) BPS-16
(Promoted from SCL/CT)

| S No | St. No | Name | Present place of posting | Placement |
|------|--------|----------------|--------------------------|--|
| 1 | 95 | Alhtar Hussain | GHS No. 1 Jamrud | Against the vacant SST (Phy-Maths) Post at GHS Jaffar Khan |
| 2 | 112 | Muhammadi | GHS Lora Maina | Against the vacant SST (Phy-Maths) Post at GHS Lora Maina Jamrud |

Placement of SST (Phy-Maths) BPS-16
(Promoted from PST/SPS/PST)


| S No | St. No | Name | Present place of posting | Placement |
|------|--------|---------------|--------------------------|--|
| 1 | 212 | Hidayat Ullah | GPS Gudar No. 1 | Against the vacant SST (Phy-Maths) Post at GHS Sur Kamar Jamrud |
| 2 | 514 | Muhammad Raza | GPS Tauda Mela | Against the vacant SST (Phy-Maths) Post at GHS Paindi Lalma Jamrud |
| 3 | 546 | Musala Shah | GHS Jan Khan | Against the vacant SST (Phy-Maths) post at GHS Jan Khan Killi Bara Khyber Agency |

Placement of SST (General) BPS-16
(Promoted from Sr. C/CT)

| S No | St. No | Name | Present place of posting | Placement |
|------|--------|-----------------|--------------------------|--|
| 1 | 4 | Faiz Khan | GHS Kam Shalman | Against the vacant SST (General) Post at GMS Chapari Jamrud |
| 2 | 5 | Muhammad Yuseen | GHS Muhammad Khan | Against the vacant SST (General) Post at GHS Muhammad Khan LKL |
| 3 | 6 | Mashiat Khan | GHS Jamrud No. 2 | Against the vacant SST (General) Post at GMS Jabba Jamrud |
| 4 | 8 | Aam Khan | GHS Jan Khan | Against the vacant SST (General) Post at GMS Karna Khel |
| 5 | 15 | Muhammad Sher | GHS Jamrud No. 1 | Against the vacant SST (General) Post at GHS Jamrud No. 1 |
| 6 | 18 | Habib Raza | GMS Akram Killi | Against the vacant SST (General) Post at GMS Speen Qabar |
| 7 | 20 | Aamir Zeb | GHS Mian Moreha Jamrud | Against the vacant SST (General) Post at GMS Kambela Jamrud Khyber |
| 8 | 21 | Aamir Khan | GMS Akram Killi | Against the vacant SST (General) Post at GHS Gul Zamir |
| 9 | 24 | Zahid Ullah | GHS Hashim Abad | Against the vacant SST (General) Post at GHS Hashim Abad Jamrud |

Placement of SST (General) BPS-16
(Promoted from PST/SPS/PST)

| S No | St. No | Name | Present place of posting | Placement |
|------|--------|----------------|--------------------------|--|
| 1 | 78 | Jehan Zeb Khan | GHS Alam Gudar | Against the vacant SST (General) Post at GMS Gandow Bara Khyber Agency |

ATTESTED


| | | | | |
|---|-----|-----------|---------------|---|
| 4 | 122 | Get Habib | GPS Wali Baba | Against the vacant SST (General) Post at GHS Chora Jamrud |
|---|-----|-----------|---------------|---|

Placement of SST (General) BPS-16
(Promoted from SDM DMI)

| S No | St. No | Name | Present place of posting | Placement |
|------|--------|-----------|--------------------------|--|
| 1 | 1 | Fard Akim | GHS Abdul Ghafoor Khan | Against the vacant SST (General) Post at GHS Shagai Jamrud |

Placement of SST (General) BPS-16
(Promoted from SAI AT 10)

| S No | St. No | Name | Present place of posting | Placement |
|------|--------|----------------|--------------------------|--|
| 1 | 9 | Saed Bahoo Jan | GHS Zeen Tara | Against the vacant SST (General) Post at GHS Zeen Tara LKL |

Placement of SST (General) BPS-16
(Promoted from PSII/SPSL PST)

| S No | St. No | Name | Present place of posting | Placement |
|------|--------|-----------------|--------------------------|--|
| 1 | 72 | Muhammad Yousof | GPS Waruando | Against the vacant SST (General) Post at GMS Latif Killi LKL |

TERMS AND CONDITIONS

1. They would be on probation for a period of one year extendable for a further period of one year.
2. They will be governed by such rules and regulation as and when issued from time to time by the provincial Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to concerned.
5. No TA/DA is allowed for joining his duty.
6. They will give an under taking to be recorded in their service book to the effect that if any overpayment is made to him/her in the light of his order will be recovered and if he/she is wrongly promoted, he/she will be reverted.
7. Before handing over charge once again their document may be checked if they have not the prescribed qualifications as per rules, they may not be handed over charge of the post.

ATTESTED



Endst: N. 2181-88 pl. cemer. SSTs/M/33 No. dated 12-10-2017

- 1) Director Education FATA at Peshawar.
- 2) Political Agent Khyber at Peshawar.
- 3) PS to ACS FATA.
- 4) PS to Secretary SSD FATA.
- 5) Agency Accounts Officer Khyber
- 6) SSTs Concerned.
- 7) Principals/Head M. of Stations/Schools Concerned.
- 8) Sup: Local Office.

Agency Education Officer,
Khyber Agency at Jammal

ATTESTED


Ozols

ct. PST. DM

Agency Education Office
Khyber Agency at Jamrud
Phone: 091-5820265 Fax 091-5820265

Ref: _____
Dated: ___/___/2017

15

Placement

Annexure - (B)

Consequent upon the notification of FATA Secretariate Directorate of Education Khyber Pakhtunkhwa, Warsak Road Peshawar, Pakistan No:15113-60 Dated:11/10/2017, all the SCTs/CTs, PSHTs/SPSTs/PSTs, DMs/DMs, SATs/ATs STTs/TTs, of Khyber Agency who have been promoted to SSTs (Bio-Chem), SSTs (Phy-Maths), SSTs (General) male vide said notification, are hereby placed at the vacant SSTs (Bio-Chem), SSTs (Phy-Maths), SSTs (General) male posts noted against each with immediate effect in public interest.

PLACEMENT OF SST (Bio/Chem) BPS-16
PROMOTED FROM SCT/CT

| Sl. No. | Name | Present Place of posting | Placement |
|---------|---|--------------------------|--|
| 91 | Istam Uddin | GHS Jaffar Khan | Against Vacant SST(Bio-Chem) Post at GHS Jaffar Khan |
| 92 | Khan Afzal | GHS Janas Khan | Against Vacant SST(Bio-Chem) Post at GHS Janas Khan |
| 102 | Wasim Khan ✓ | GHS Jamrud No 2 | Against Vacant SST(Bio-Chem) Post at GHSS No.1 Jamrud |
| 114 | Ilauddin ✓ | GHS Ghundi | Against Vacant SST(Bio-Chem) Post at GHSS No.1 Jamrud |
| 138 | Wahab -U-Din | GHS Jamrud 1 | Against Vacant SST(Bio-Chem) Post at GHSS No.1 Jamrud |
| 147 | Shah Muhammad Khan <i>Wahabuddin</i> | GMS Shalobar No 1 | Against Vacant SST(Bio-Chem) Post at GHS Jan Khan |
| 190 | Haji Gul | GMS Meeana Para | Against Vacant SST(Bio-Chem) Post at GHS Muhammad Khan Killi LKL |
| 191 | Ali Gul | GHS Kohi Sher Haider | Against Vacant SST(Bio-Chem) Post at GHS KOHI SHER HAIDER |

PLACEMENT OF SST (Bio/Chem) BPS-16
PROMOTED FROM PSHT/SPST/PST

Wahabuddin
10/11/17

| Sl. No. | Name | Present Place of posting | Placement |
|---------|-----------------|--------------------------|---|
| 238 | Dagh e Haram | GPS Azam Din | Against Vacant SST(Bio-Chem) Post at GHS Akhun Talab Bara Khyber Agency |
| 283 | Muhammad Farooq | GPS Gul Muran | Against Vacant SST(Bio-Chem) Post at GHS Sama Ghari Khyber Agency |
| 409 | Asif Noor | GPS Tood Kamar | Against Vacant SST(Bio-Chem) Post at GHS Tood Kamar BZK-LKL Khyber Agency |

ATTESTED
[Signature]

PLACEMENT OF SST (Phy-Maths) BPS-16

PROMOTED FROM SCU/CD

6

| Sl. No. | Name | Present Place of posting | Placement |
|---------|----------------|--------------------------|---|
| 15 | Akhtar Hussain | ✓ GHSS No1 Jamrud | Against Vacant SST(Phy-Maths) Post at GHSS No.1 Jamrud |
| 152 | Muhammad Arif | GHS Lora Maina | Against Vacant SST(Phy-Maths) Post at GHS Lora Maina Jamrud |

PLACEMENT OF SST (Phy-Maths) BPS-16

PROMOTED FROM PSCT/SPST/PST

| Sl. No. | Name | Present Place of posting | Placement |
|---------|----------------|--------------------------|---|
| 252 | Hidayat Ullah | GPS Gudar No.1 | Against Vacant SST(Phy-Maths) Post at GHS Sur Kamar Jamrud |
| 544 | Muhammad Rafiq | ✓ GPS Tauda Mela | Against Vacant SST(Phy-Maths) Post at GHS Pindi Lalma Jamrud |
| 546 | Musafar Shah | GHS Jan Khan | Against Vacant SST(Phy-Maths) Post at GHS Jan Khan Killi Bora Khyber Agency |

PLACEMENT OF SST (General) BPS-16

PROMOTED FROM SCU/CD

[Signature]
12/17/17

| Sl. No. | Name | Present Place of Posting | Placement |
|---------|-----------------|--------------------------|---|
| 4 | Fazle Rehman | GHS Kam Shalman | Against Vacant SST(General) Post at GMS Chapari Jamrud |
| 5 | Muhammad Yaseen | GHS Muhammad Khan | Against Vacant SST(General) Post at GHS Muhammad Khan I.K.I. |
| 6 | Musharaf Khan | GHS Jamrud No.2 | Against Vacant SST(General) Post at GMS Jabba Jamrud |
| 8 | Adam Khan | GHS Jan Khan | Against Vacant SST(General) Post at GMS Karna Khel |
| 15 | Muhammad Sher | ✓ GHS Jamrud No.1 | Against Vacant SST(General) Post at GHS Jamrud No.1 |
| 18 | Habib ur Rehman | GMS Akram Lilli | Against Vacant SST(General) Post at GMS Speen Qabar |
| 20 | Aurang Zeb | GHS Mian Marcha Jamrud | Against Vacant SST(General) Post at GMS Kambela Jamrud Khyber |
| 21 | Aqal Khan | GMS Akram Killi | Against Vacant SST(General) Post at GHS Gul Zamir |
| 24 | Zabid Ullah | GHS Hashim Abad | Against Vacant SST(General) Post at GHS Hashim Abad Jamrud |

PLACEMENT OF SST (General) BPS-16

PROMOTED FROM PSCT/SPST/PST

ATTESTED
[Signature]

(7)

| | | |
|-------------|---------------|---|
| | Kili | GMS Khaista Gul Jamrud |
| 2 Gul Habib | GPS Wali Baba | Against Vacant SST(General) Post at GHS Chora Jamrud |

PLACEMENT OF SST (General) BPS-16
PROMOTED FROM SDM/DM

SDM. D.M

| S.L No | Name | Present Place of Posting | Placement |
|--------|------------|--------------------------|--|
| | Farid Alam | GHS Abdul Ghafoor Khan | Against Vacant SST(General) Post at GHS SHAGAI JAMRUD |

PLACEMENT OF SST (General) BPS-16
PROMOTED FROM SAT/ACTO

| S.L No | Name | Present Place of Posting | Placement |
|--------|----------------|--------------------------|--|
| | Said Bahoo Jan | GHS Zeen Tara | Against Vacant SST(General) Post at GHS Zeen Tara LKL |

PLACEMENT OF SST (General) BPS-16
PROMOTED FROM SET/IT

| S.L No | Name | Present Place of Posting | Placement |
|--------|-----------------|--------------------------|---|
| 72 | Muhammad Yousaf | GPS Warmando | Against Vacant SST(General) Post at GMS Latif Kili LKL |

Terms and conditions


- 1 They would be on probation for a period of one year extendable for a further period of one year
- 2 They will be governed by such rules and regulations as and when issued from time to time by the provincial Govt.
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 No TA/DA is allowed for joining his duty.
- 6 They will give an under taking to be recorded in their service book to the effect that if any overpayment is made to him/her in the light of this order will be recovered and if he/she is wrongly promoted, he/she will be reverted.
- 7 Before handing over charge once again their document may be checked if they have not the prescribed qualifications as per rules, they may not be handed over charge of the post.
- 8 They shall not be considered for promotion until they are promoted.


ATTESTED



No. 2181-88 placement/SSTs/M/33Nos Dated: 12/10/2017

Director Education FATA at Peshawar.
Political Agent Khyber at Peshawar
PS to ACS FATA.
PS to Secretary SSD FATA.
Agency Accounts officer Khyber
SSTs concerned.
Principals/Head Mastres of Stations/Schools concerned.
Sup: Local office.


Agency Education Officer
Khyber Agency at Jamrud
12/10/17

ATTESTED


8



Agency Education Office
Khyber Agency at Jamrud
PHONE. 091-5820584 FAX 091-5820584

No: 3401
Date: 10/11/2017

Annexure - C

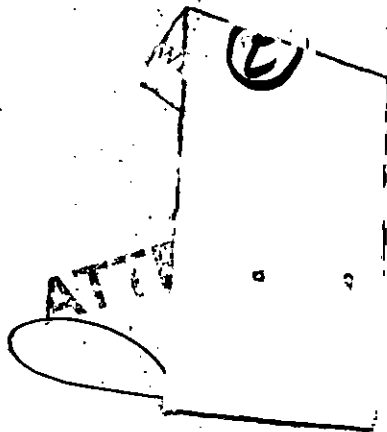
To

The Director Education,
FATA at Peshawar

Subject:- SENIORITY LIST.
Memo

Enclosed find please herewith in original application in respect of the following CTs/PSTs on subject cited above.

The case is submittd for further necessary action please



AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

(9)

بخدمت جناب ڈائریکٹر صاحب ایجوکیشن فاٹا

بوساطت ایجنسی ایجوکیشن آفیسر صاحب خیبر ایجنسی

(درخواست برآمدانہ/منصفانہ غور)

Annexure D

Encl No = 8181-88

۱۵/۱۸ مودبانہ گزارش کی جاتی ہے کہ SST پر موشن آرڈر برطابق نمبر: 15113-60 مورخہ 17/10/2017 کی ہے۔ جو کہ Deptt: Promotion Policy کے منافی ہے۔ جس سے ان اساتذہ جو کہ B.Ed لیول پر ہیں۔ ان کی حق اور حوصلہ شکنی ہوئی ہے۔ ان اساتذہ کے اس سلسلے میں درجہ ذیل تحفظات ہیں۔

- ①۔ فائٹا میں SST اساتذہ کرام کی ترقی/تقرری ڈیپارٹمنٹس پر موشن پالیسی کے مطابق Prescribed Qualification کے سناریو کے مطابق ہو رہی تھی۔ لیکن اس بار پالیسی کو پامال کر کے اساتذہ کو SST پوسٹ پر ترقی دی گئی ہے۔ جو کہ مذکورہ بالا پالیسی کے منافی ہے۔
 - ②۔ فائٹا میں SNE پرانی ہے لہذا پرانے SNE کے مطابق SST سائنس اور SST جنرل کی پوسٹنگ ڈسٹریکشن ہونی چاہیے۔ یعنی جتنے تعداد میں SST سائنس کے پوسٹ Vacant ہیں اس تعداد میں SST سائنس کو ترقی دی جائے اور جتنی تعداد میں SST جنرل کے سیٹ خالی ہیں۔ اتنی تعداد میں SST جنرل تعینات/ترقی دی جائے۔
 - ③۔ فائٹا میں KPK کے طرز پر SST پر موشن کی گئی ہے۔ جو کہ اس پالیسی کی فائٹا میں Implementation غلط ہے۔ کیونکہ KPK میں نئی SNE کے مطابق SST کی ترقی/تقرری کی گئی ہے۔ جبکہ فائٹا میں پرانے خالی پوسٹیں/پرانے SNE میں نئی پالیسی کے مطابق SST کو ترقی دی گئی ہے۔ جو ہمارے سسر اساتذہ کی حق تلفی کی گئی ہے۔
- لہذا استدعا ہے کہ درجہ بالا حقائق اور تحفظات کو مدنظر رکھ کر حالیہ SST پر موشن آرڈر کو منسوخ کر کے حق پرستی پرانے SNE کے مطابق پر موشن آرڈر جاری کی جائے۔ بصورت دیگر ہم سسر اساتذہ عدالت جانے پر مجبور ہو گئے۔

ATTESTED

العارض

| دستخط: | پوسٹ | کوالیفیکیشن | نام | ✓ |
|--------|-------|---------------|------------|-----|
| | PSHT | MA-B.Ed | محمد عمران | ① ✓ |
| | PSHT | MA. B.Ed | انعام اللہ | ② ✓ |
| | SCT | M.A. BEd | درویش | ③ ✓ |
| | SCT | B.A. B.ed | کشترفان | ④ ✓ |
| | SCT | MA, BEd./MED. | عبدالغفر | ⑤ ✓ |
| | S.D.M | MA BEd | محمود خان | ⑥ ✓ |
| | SCT | MA/BEd, MED. | عبدالغنی | ⑦ ✓ |
| | PSHT | M.A./B.ed | فرمان علی | ⑧ ✓ |
| | PSHT | M.A. B.Ed. | غلام محمد | ⑨ ✓ |
| | PSHT | M.A. M.Ed | جان اکبر | ⑩ ✓ |
| | PSHT | B-A/B.Ed | شیر برداں | ⑪ ✓ |
| | SCT | B.A/B.Ed | دنیا سہ | ⑫ ✓ |

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th July, 2014.

Amexure - E

NOTIFICATION

No.SO(PE)4-5/SSRC/Meeting/2013/Teaching Cadre:- 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 Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notifications No.SO(G)S&LD/1-28/2003/Vol-II dated, 09-04-2004, Notification No.SO(G)S&L/1-69/06/Vol-1/DPE/LIB dated, 13-11-2007, and Notification No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre, dated, 13.11.2012, the following further amendments shall be made, namely:

AMENDMENTS

In the Appendix,-

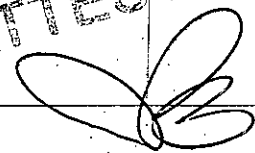
- (i) Serial No. 1 shall be renumbered as 1B and before Serial No. 1B, as so renumbered, the following new entries shall be inserted in respective columns, namely:

| 1 | 2 | 3 | 4 | 5 |
|---|-----------------------------|---|----------------|---|
| 1 | Subject Specialist (BPS-17) | i. At least second class Master's Degree or four years BS Degree in the relevant subject; and ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualification from a recognized University. | 23 to 35 years | (a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-16), with at least five years service as such and having qualification mentioned in column No. 3. Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial |

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| | | | | recruitment; and (b) fifty percent by initial recruitment. |
| IA | Director Physical Education (BPS-17) | At least second class Master's Degree in Physical Education from a recognized University. | 22-35 years | (a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No. 3; Provided that if no suitable person is available from amongst Senior Physical Education Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Physical Education Teachers, with at least five years service as such and having qualification mentioned in column No. 3; Note:- If no suitable candidate is available in the relevant cadres of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment; and (b) fifty percent by initial recruitment"; and |

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(ii) against Serial No. 1B, as so renumbered, for the existing entries, the following shall be substituted, in respective columns, namely:

| 1 | 2 | 3 | 4 | 5 |
|------|-----------------------------------|--|-----------------|---|
| "1B. | Secondary School Teacher (BPS-16) | <p>I. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology), Or (b) (Physics, Maths "A" or "B" or Statistics) Or (c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p>and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualifications from a recognized University.</p> | 21 to 35 years. | <p>1. Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner:</p> <p>(a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(b) four per cent from amongst the Senior Drawing Masters(BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3:</p> |

ATTESTED

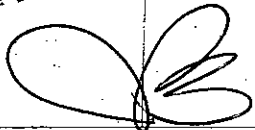

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| | | | | |
|--|--|--|--|--|
| | | | | <p>Provided that if no suitable candidate is available from amongst Senior Drawing Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(c) four per cent from amongst the Senior Arabic Teachers(BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, and having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(d) four per cent from amongst the Senior Theology Teachers(BPS-16); with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3:</p> |
|--|--|--|--|--|

ATTESTED

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|--|--|--|--|
| | | | <p>Provided that if no suitable candidate is available from amongst Senior Theology Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No. 3;</p> <p>Provided that if no suitable candidate is available from amongst the Senior Qaris then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Qaris with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3;</p> <p>Provided that if no suitable candidate is available from amongst</p> |
|--|--|--|--|

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Primary School Head Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No.3:

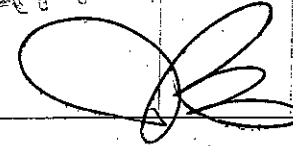
Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as such and having qualification mentioned in column No. 3; and

(ii) twenty Five percent by initial recruitment.

Note:

- I. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.
- II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately."

ATTESTED



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

Endst : of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officer (M&F) in Khyber Pakhtunkhwa.
14. All District Account Officer in Khyber Pakhtunkhwa.
15. All Agency Education Officer in FATA
16. All Agency Account Officer in FATA.
17. PS to Governor Khyber Pakhtunkhwa. Peshawar.
18. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
19. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
20. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
21. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.
22. Master file

ATTESTED

(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)

VAKALATNAMA

In The Court of KP Service Tribunal, Pesh:

OF 2018

Inam Ullah.

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

ACS FATA & OTHERS

(RESPONDENT)
(DEFENDANT)

I/We Inam Ullah.

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

Dated. 02 / Mar / 2018

Inam Ullah
CLIENT

ACCEPTED

NOOR MOHAMMAD KHATTAK
&
MUHAMMAD MAAZ MADNI
ADVOCATES

OFFICE:

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

Phone: 091-2211391

Mobile No.0345-9383141