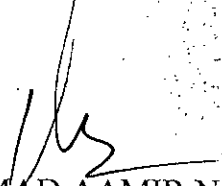


17.03.2017


Appellant in person and Addl:AG alongwith Mr. Murad Khan, Supdt for respondents present. Appellant requested for adjournment. To come up for arguments on 23.06.2017.



(ASHFAQUE TAJ)
MEMBER


(MUHAMMAD AAMIR NAZIR)
MEMBER

23.06.2017

Counsel for the appellant present. Mr. Murad Khan, Superintendent alongwith Mr. Muhammad Jan, Deputy District Attorney for the respondents also present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 10.10.2017 before D.B.


(Gul Zoo Khan)
Member

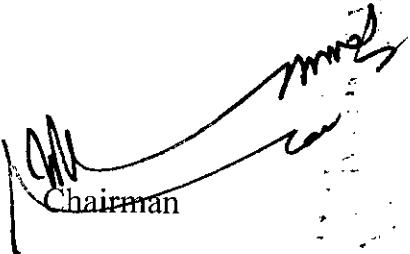

(Muhammad Amin Khan Kundi)
Member

10.10.2017

Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondents present. Arguments heard and record perused.

This appeal is also dismissed as per our detailed judgment of today in connected service appeal No. 904/2013, entitled "Muhammad Iqbal Vs. Government of Khyber Pakhtunkhwa through Chief Secretary, Peshawar and others". Parties are left to bear their own costs. File be consigned to the record room.


Member


Chairman

ANNOUNCED
10.10.2017

25.11.2015

None present for appellant M/S Sultan Shah Assistant and Shehnaz Bibi, Assistant alongwith Addl: A.G for respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply/comments on 21.3.2016 before S.B.


Chairman

21.03.2016

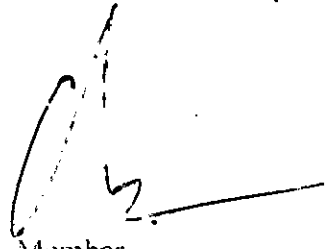
None present for appellant. M/S Sultan Shah, Assistant and Syed Murad, Supdt. alongwith Addl: A.G for respondents present. Para-wise comments submitted. The appeal is assigned to D.3 for rejoinder and final hearing for 28.6.2016.


Chairman

28.6.2016

Clerk to counsel for the appellant and Mr. Murad Ali, Supdt. alongwith Mr. Ziaullah, GP for respondents present. Rejoinder submitted which is placed on file. To come up for arguments on 9.11.2016.

Member


Member

09.11.2016

None present for the appellant. Mr. Muhammad Jan, GP for respondents present. Notices be issued to the appellant and his counsel. To come up for arguments on 17.3.17.


(Muhammad Aamir Nazir)
Member


(Pir Baksh Shah)
Member

Note
For Hassan ul Afridi

10.03.2015

Appellant Deposited
Security & Process Fee

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as Associate Professor (BPS-19) when 142 posts ~~were~~ BPS-19 to BPS-20 were up-graded vide four-tier formula issued by the Provincial Government on 26.11.2011. That vide notification of up-gradation officers serving in BPS-19 to BPS-20 were given up-gradation w.e.f 01.07.2012 but the appellant was deprived of the same despite the fact that his name was reflecting in the seniority list dated 27.04.2011 at S.No. 95. That the appellant preferred departmental appeal on 22.01.2013 which was not responded and hence the present service appeal on 08.05.2013.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 22.06.2015 before S.B.


Chairman

22.06.2015

Agent of counsel for the appellant and Addl: A.G for respondents present. Requested for adjournment. To come up for written reply/comments on 3.9.2015 before S.B.


Chairman

03.09.2015

None present for appellant. Ms. Shehnaz, Assistant for respondent No. 4 alongwith Addl: A.G for all respondents present. Requested for adjournment. To come up for written reply/comments on 25.11.2015 before S.B.


Chairman


11. 27.08.2014

Clerk to counsel for the appellant present and submitted before the court that due to engagement in personal affairs, counsel for the appellant is unable to attend the Tribunal. He requested for adjournment. To come up for preliminary hearing on 30.10.2014.


MEMBER

12. 30.10.2014

Counsel for the appellant present. Preliminary arguments partly heard. The matter required further clarification, therefore, pre-admission notice be issued to the AAG/GP to assist the Tribunal. To come up for preliminary hearing on 06.01.2015.


Member

13. Reader Note:

06.01.2015


Clerk of counsel for the appellant and Mr. Kabirullah Khattak, Asst: Advocate General for the respondents present. Since the Tribunal is incomplete, therefore, case is adjourned 10.03.2015 for the same.


Reader

7.

12.03.2014

Counsel for the appellant present and requested for adjournment to file certain facts/ground in the memo of appeal. To come up for preliminary hearing on 05.05.2014.


Member

8.

05.05.2014

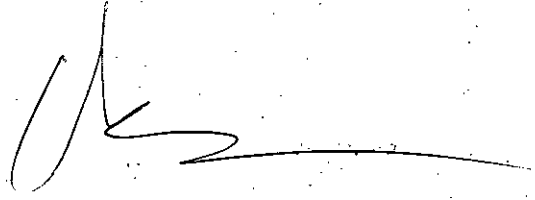
Clerk of counsel for the appellant present and requested for adjournment due to general strike of the Bar. To come up for preliminary hearing on 30.05.2014.


Member

9.

30.05.2014

Counsel for the appellant present and requested for adjournment. Request accepted. To come up for preliminary hearing on 26.06.2014.


Member

10.


26.06.2014

Appellant with counsel present and requested for adjournment. Request accepted. To come up for preliminary hearing on 27.08.2014.


Member

3
29.07.2013

No one is present on behalf of the appellant. Case is adjourned. To come up for preliminary hearing on 21.10.2013.


Member

4
02.10.2013

Counsel for the appellant present and requested for adjournment. To come up for preliminary hearing especially on the point of maintainability on 26.11.2013.


Member

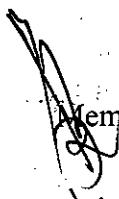
5
26.11.2013

No one is present on behalf of the appellant. Last chance is given to the appellant for preliminary hearing on 23.01.2014


Member

6
22.01.2014



Clerk of counsel for the appellant present and requested for adjournment. To come up for preliminary hearing on 12.03.2014.


Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 905/2013


| S.No. | Date of order Proceedings | Order or other proceedings with signature of judge or Magistrate |
|-------|---------------------------|--|
| 1 | 2 | 3 |
| 1 | 17/05/2013 | <p>The appeal of Mr. Muzaffar Iqbal resubmitted today by Mr. Hassan U. K. Afridi Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p> |
| 2 | 15-7-2013 | <p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>29-7-2013</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> |

The appeal Mr. Muzaffar Iqbal son of Pir Bakhsh Associate Professor (R) received today i.e. on 08/05/2013 is incomplete on the following scores which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Appeal may be got signed by the appellant.
- 2- Copy of Impugned seniority list dated 06/8/2012 mentioned in the heading of appeal is not attached with the appeal which may be placed on it.
- 3- Annexures of the appeal may be annexed serial wise as mentioned in the memo of appeal.
- 4- Annexures of the appeal may be attested.

No. 761 /S.T,

Dt. 9/5 /2013.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Hassan U.K Afridi Adv. Pesh.

I have fulfilled the above mentioned objections. And re-submitted on-16-5-2013



1

BEFORE THE KHYBER PUKHTUN KHAWA SERVICE TRIBUNAL,
PESHAWAR.

SERVICE APPEAL NO. 905 / 2013.

~~Law of Evidence~~
~~Section 887~~
~~08-5-13~~

=====

Muzaffar Iqbal S/O Pir Bakhsh , Associate professor
(Rtd;) EPS-19, at Government post Graduate College, Kohat
presently resident at street No.4, College Town,
Rawalpindi Road, Kohat APPELLANT.

VERSUS.

1. Government of K.P.K. through Chief secretary,
Civil Secretariat, Peshawar.
2. Government of K.P.K. through secretary Establishment,
Department , Civil Secretariat, Peshawar.
3. Government of K.P.K. through its secretary Higher
Education department, Civil Secretariat, Peshawar.
4. Director Higher Education , K.P.K. Peshawar.
5. Deputy Director (Establishment) Higher Education ,
K.P.K. Peshawar. RESPONDENTS.

=====

APPEAL U/S 4 of the K.P.K. service Tribunal
Act, 1974, against the impugned tentative
seniority List of Associate professors (EPS-19)
Male college cadre dated 6/8/2012, whereby the
name of the appellant has been dropped without
lawful justification , against law , Rules, &
Regulations while the name of the appellant has

~~used to-day~~
[Signature]
8/5/13

re-submitted to ~~the~~
and filed.

[Signature]
17/5/13

been mentioned in the approval seniority List
issued on 27/04/2011.

=====

PRAYER IN APPEAL: On acceptance of this appeal the
impugned seniority List issued on 6/8/2012, may
kindly be ordered to amend to the extent the name
of the appellant and the appellant may kindly be
considered for Up-gradation / promotion in (EPS- 20)
and the appellant may kindly be awarded all the
prevalige / Benefits / incentives in accordance
with law.



Any other relief which this Honourable Tribunal
may deem fit for the safe administration of justice.

=====

RESPECTFULLY SHEWETH:

Facts of the case are as under :-

1. That the appellant was appointed as Lecturer (EPS-17)
on 28/10/1981 in the Higher Education Department.
(Copy of history of service is attached).
2. That the appellant performed his duties well and to the
best satisfaction of the department.

- 3. That the appellant was promoted as ~~ASSISTANT~~ Professor (EPS-18) on 20/10/1993.
- 4. That the appellant ~~was~~ promoted as Associate professor (EPS- 19) on 22/2/2007.
- 5. That on 27/4/2011, the approved seniority List of (EPS-19) WAS Issued through Notification SO(AB/1-12/HE/2008, in which the name of the appellant was mentioned ~~at~~⁺ serial No.95.
- 6. That another tentative seniority List issued on 6/8/2012 in which the name of the appellant has been deleted without any justification and in this regard the appellant has not been informed .
- 7. That the appellant has been retired from service on 9/8/12(AM) and when the appellant came to know regarding the deletion of ~~his~~ name in the tentative seniority List , then on the next day on 22/1/2013, filed Departmental appeal , which has no reply / response , hence this service appeal on the following amongst the other grounds :-

G R O U N D S:

- 1. That the impugned tentative seniority List issued on 6/8/2012, is against law , rules and Regulations embodiant

in the Service Laws, which is liable to be corrected / amended to the extent of the name of the appellant.

- B). That the name of the appellant has been mentioned in the approved Seniority List BPS-19, issued on 27/4/2011, in Serial No.95.
- C). That according to the Notification No. SO(C-II)HED/1-5 from ~~Tiers~~/2012-13, issued on 26/11/2011, the promotion be awarded to revise the four Tier Formola , from the Ratio 1 : 15 ? 34 to the Ratio of 5 : 20 : 37 , 38 with effect from 1/7/2012, while the appellant was retired on 9/8/2012 (A/N)
- So the appellant is entitled for Promotion in BPS-20 in accordance with law.
- D). That according to the letter issued on 19/7/2012, 142 Seats ^{of strength / posts} have been sanctioned in (BPS-20) for Upgradation under revise four Tier Formolas 1:15:34:50 to 5: 20:37:38 with effect from 1/07/2012, but the appellant has been deprived without any justification and legal reason, which is against law and justice.
- E). That the Seniority List has been delivered to ~~BPS~~.B. in which the name of the appellant has been deleted without any justification.

- F). That the names of some retired Associate Professors (BPS-19) have been sent to the P.S.B. as :-
- (i) Muhammad Pervez, Associate Professor (M.Sc Botney) Govt: College *Mitran*, his retired date is 1/11/2012,
 - (ii) Abdul Qayyum B.I.S.E. (M.Sc, state) Abbottabad, his retirement date is 14/10/2012.
 - (iii) Imtiaz Ahmad ,Associate Professor (M.A .Political Schience) Govt: College Peshawar , his retirement date is 23/11/2012.
 - (iv) Muhammad Ismail Associate Professor (M.Sc.Maths) Govt: Post Graduate College Swat , retired on 2/11/12, etc.
- G). That the appellant is eligible for Upgradation /Promotion in BPS- 20 before his retirement /*superannuation*
- H). That seniority is a vested right , it can not be disturb without assigning any reason and without giving opprtunity of hearing affected perons.
- I). That under the rules , the list of Seniority be prepared by the *Competant* Authority while the tentaitve list has prepared by the Deputy Director establishment.
- J). That some other grounds may be adduced at the time of arguments with the permission of this Hon'ble Tribunal.

It is, therefore, most humbly prayed that on acceptance of this appeal, the impugned tentative Seniority List issued on 6/8/2012, may kindly be ordered to amend to the extent of the name of the appellant and name of the appellant may kindly be sent for consideration for upgradation/. Promotion to P.S.B. in BPS-20 and the appellant may kindly be awarded all the increments/ benefits / prevalage in accordance with law

Any other relief which this Honourable Tribunal may deem fit for the safe administration of justice.

M. U. Khan
Appellant

Through:

(HASSAN U.K. AFRIDI)
Advocate High Court,
Peshawar.

Dated :- 08/5/2013.

=====
A F F I D A V I T.

I, Hassan U.K.Afridi, Advocate High Court, Peshawar as per instrucion of my Client Petitioner, do hereby solemnly affirm and declare that the contents of this appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed from t this Hon'ble Tribunal.

DEPONENT.

(HASSAN U.K. AFRIDI)
Advocate, Peshawar.



BEFORE THE KHWBER PUKHTUNKHAWA SERVICE TRIBUNAL,
PESHAWAR.

C.M. No. _____ / 2013

IN
Service Appeal No. _____ / 2013.

=====

MUZAFFAR IQBAL S/O PIR BAKHSH APPLICANT.

VERSUS

GOVT: OF K.P.K. THROUGH CHIEF SECRETARY ,CIVIL
SECRETARIT, PESHAWAR & OTHERS RESPONDENTS.

=====

APPLICATION FOR THE SUSPENSION OF THE FINAL SENORITY
LIST AND NOTIFICATION IF ANY, FOR THE UPGADITION/
PROMOTION OF THE ACCOCIATE PROFESSORS BPS= 19, INTO
BPS= 20 TILL THE FINAL DISPOSAL OF THIS APPEAL.

=====

RESPECTFULLY SHEWETH:

1. That the appellant filed the above titled appeal alongwith this application , which has bright chances to succeed.
2. That the appellant has a good prima facie case in his favour as the same is on very strong grounds.
3. That the balance of convenience also lies in favour of the appellant/ applicant.

- 4. That if the impugned Seniority List and Notification regarding Up-Gradation / Promotion of the Associate Professors BPS-19 into BPS-20 has not been suspended then the appellant will suffer irreparable loss.
- 5. That the grounds of appeal may also be considered as integral part of this application .

It is, therefore, most humbly prayed, that on acceptance of this application the impugned Seniority List and Notification as mentioned above if any, be kindly suspended till the final disposal of the main appeal.

Applicant/ Appellant

Through:-

(HASSAN U.K. AFRIDI)
Advocate High Court,
Peshawar.

Dated :- 8/5/2013.

=====

A F F I D A V I T.

I, Hssan U.K. Afridi, Advocate High Court, Peshawar as per instruction of my Client applicant/Appellant do hereby solemnly affirm and declare that the contents of this application are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.



DEPONENT.

(HASSAN U.K. AFIRIDI)
Advocate, Peshawar.

HISTORY OF SERVICE OF GAZETTED GOVT: SERVANT OF GOVT. OF N.W.F.P.

9

PERSONAL DATA

HISTORY OF SERVICE

DEPARTMENT / OFFICE

1. Name Muzaffer Iqbal
 3. Date of Birth 10.8.1952.
 5. Domicile Kohat
 7. Mother Tongue Pashto
 9. GPFd A/C No. CL-1/BU.168/58
 11. Computer P. No. 158273.

2. F / Name Pir Bahadar
 4. Religion Islam
 6. Date of Apptt: 28.10.1981 on lectur
on adhoc basis
 8. NIC No. 21.5.1983 as lecturer
on regular basis
 10. Joined Service in BPS 17
 As Lecturer.
 12. Qualification MSc
 a. Academic MSc
 b. Professional -

(in case of more than one P. No. Please mention all)

SERVICE RECORD

| Post held. | BPS | Deptt' Station | Period | | Duty / Leave Training etc: | Remarks |
|------------------------|----------------|----------------------------|-----------------------------------|---------------------------------------|-------------------------------|--|
| | | | From | To | | |
| Lecturer Adhoc | B-17 | High Edu. Larkhi Deptt. | 28 ¹⁰ / ₈₁ | 21 ⁵ / ₈₃ | | Appointed as Lecturer on adhoc basis up 28.10.1981 |
| Lecturer Regular | " | " | 21 ⁵ / ₈₃ | 25 ⁸ / ₈₇ | | Selected by NWFP Public Serv Commission of 21 ⁵ / ₈₃ |
| " | " | Abboicebad | 26 ⁸ / ₈₇ | 6 ³ / ₈₈ | | |
| " | " | Hangu | 7 ³ / ₈₈ | 14 ² / ₁₉₉₀ | | |
| " | " | Kohat | 15 ² / ₉₀ | 19 ¹⁰ / ₁₉₉₃ | | |
| Assoc Prof. | B-18 | " | 20 ¹⁰ / ₉₃ | 30 ¹¹ / ₉₆ | | Promoted as Assoc Prof by 20 ¹⁰ / ₉₃ |
| " | B-19 (M/over) | " | 1 ¹² / ₉₆ | 21 ² / ₉₇ | | Granted M/over B-19. |
| Associate Professor | B-19 (Regular) | " | 22 ² / ₉₇ | 12 ⁴ / ₂₀₁₀ | | Promoted as Associate Professor in B-19 on regular basis. |
| Principal BC Hangu | " | Hangu | 13 ⁴ / ₂₀₁₀ | 2 ⁸ / ₂₀₁₀ | | |
| Associate Professor | " | Kohat | 3 ⁸ / ₂₀₁₀ | 9 ⁸ / ₂₀₁₂ (AN) | | Promoted on supervention. |

Available no leave during the entire period of service.

| | | | | | | | | |
|--|-------|-------|------|-----|------|-------|-------|----------|
| pay 01 ¹² / ₂₀₁₁ | day | T/M/N | CA | CA | MA | NR-10 | NR-11 | PRC |
| | 63000 | 5904 | 2480 | 500 | 5716 | 19055 | 5716 | = 102371 |
| 12/01/2012 | 63000 | 5904 | - | 500 | 5716 | " | " | |

District Comptroller of Accounts
Kohat

HASSAN U.K. AFRIDI
(Advocate)
High Court Peshawar

**GOVT. OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION ARCHIVES & LIBRARIES
DEPARTMENT**

Dated Peshawar the 27-4-2011

Notification :- SO(AB)/1-12/HE/2008


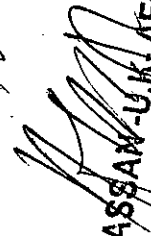
In excercises of Powers conferred under sub-section(1)of Section-8 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 read with 4(1)a of Khyber Pakhtunkhwa Civil Servant Act 1989 Establishment Department letter No. SOR-1(E&AD)3-15/88 (Vol.I) dated 9-5-2002, the Competent Authority is pleased to approve the Seniority List of (288) Associate Professor (B-19) of College Cadre under Higher Education Department as it stood on 31-03-2011

**UPDATE SENIORITY LIST OF ASSOCIATE PROFESSORS BPS-19(COLLEGE CADRE).
(MAEL)CORRECTED UPTO 31-3-2011 (Total Sanctioned posts=478**

| S.No | Name of Officers with Qualification | Date of Birth/ Domicile | Date of 1st Entry in to Govt. Service | Date of Regular Appointment to the service/cadre. | Regular/Promotion to the present post. | | Mode of App: | Remarks |
|------|--|----------------------------|---|---|---|-----|-----------------|---------|
| | | | | | Date | BPS | | |
| 1 | Mr. Abdur Rahman M.Sc Botany, GPGC, Bannu | 06.03.1958 Bannu | 20.10.1982 | 20.10.1982 | 11.12.1999 | 19 | Promotion | |
| 2 | Muhammad Nafees M.A Pol: Science, Sari Naurang (Lakki Marwat) | 02.08.1956 Lakki | 14.11.1981 | 14.11.1981 | 11.12.1999 | 19 | Promotion | |
| 3 | Mr. Ghulam Sarwar M.Sc Maths, GPGC, Mandian (Abbottabad) | 21.01.1962 Abbottabad | 01.03.1986 | 01.03.1986 | 29.05.2000 | 19 | PSC | |
| 4 | Mr. Muhammad Islam M.Sc Physics, Depuation Quality Edu.(FATA) | 01.05.1954 Kohat | 23.05.1978 | 23.05.1978 | 29.05.2000 | 19 | PSC | |
| 5 | Mr. Fazle Rabbi M.A English, Secretary BISE, Peshawar | 27.05.1957 Karak | 18.03.1982 | 28.01.1984 | 29.05.2000 | 19 | PSC | |
| 6 | Mr. Abdul Latif Khan M.Sc Zoology, Principal GDC, Batkhela | 03.03.1961 Dir | 10.05.1986 | 10.05.1986 | 29.05.2000 | 19 | PSC | |

Abdullah
HASSAN M. AFRIDI
(Advocate)
High Court Peshawar

| | M.A Pol: Science, G.C, Banda Daud Shah | Karak | | | | | |
|----|--|--------------------------|------------|------------|-----------|----|---|
| 92 | Mr. Ziaul Haq M.Sc Maths, G.C, Thana. | 09.05.1955 Malakand | 21.03.1981 | 21.05.1983 | 21-2-2007 | 19 | Promotion |
| 93 | Mr. Kala Khan Awan M.A Pol: Sc, On deputation to Hazara Univ. | 13.04.1956 Abbottabad | 01.10.1981 | 21.05.83 | 21-2-2007 | 19 | Promotion On deputation to Hazara University w.e.f 1-7-2011 to 30-6-2013 |
| 94 | Mr. Imtiaz Ahmad M.A Pol: Sc, G.C, Esak Khel Lakki. | 01.01.1957 Lakki | 13.10.1981 | 21.05.1983 | 21-2-2007 | 19 | Promotion |
| 95 | Mr. Muzaffar Iqbal M.Sc Maths GPGC, Kohat | 10.08.1952 Kohat | 28.10.1981 | 21.05.1983 | 21-2-2007 | 19 | Promotion |
| 96 | Mr. Sharifullah M.A History Principal G.C, Ghazni Khel | 21.03.1956 Lakki | 03.10.1981 | 21.05.1983 | 21-2-2007 | 19 | Promotion |
| 97 | Mr. Abidullah Jan M.Sc Phys:, GSSC, Peshawar. | 01.09.1957 Charsadda | 18.01.1983 | 21.01.1987 | 21-2-2007 | 19 | Promotion |
| 98 | Mr. Abdul Qayum M.A English GC, Balakot | 01.02.1956 Mansehra | 13.10.1981 | 25.01.1984 | 21-2-2007 | 19 | Promotion |
| 99 | Muhammad Nabi Shah | 11.10.1957 | 18.10.1982 | 28.06.1984 | 21-2-2007 | 19 | Promotion |



HASSAN-U-K. AFRIDI
 (Advocate)
 High Court Peshawar



GOVT. OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT

Dated Peshawar the 26.11.2011.

NOTIFICATION

26-11-2011

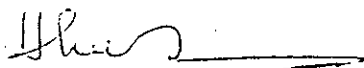
NO. SO(C-II)HED/1-5/Four Tiers/2012-13. Consequent upon approval of the Competent Authority, sanction is hereby accorded to revise the four-tier formula for the promotion of College teachers from the ratio of 1:15:34:50 to the ratio of 5:20:37:38 with effect from 01.07.2012.


SECRETARY TO GOVT. OF
KHYBER PAKHTUNKHWA
HIGHER EDUCATION DEPARTMENT

Endst:- No. & Date Even.

Copy forwarded for information and necessary action to the:-

- 1) *to the Chief Minister, Khyber Pakhtunkhwa, Peshawar.*
- 2) *Director, Higher Education, Khyber Pakhtunkhwa, Peshawar.*
3. P.S to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
4. P.S to Secretary Establishment Department.
5. P.S to Secretary Finance Department.
6. P.S to Minister, Higher Education, Khyber Pakhtunkhwa.
7. P.S to Secretary, Higher Education Department.
8. P.S to Secretary, Higher Education Department.


(HABIB-UR-RAHMAN)
SECTION OFFICER (COLLEGES-II)


HABIB-UR-RAHMAN - AFRID
Advocate
High Court Peshawar



13

GOVT. OF KHYBER PAKHTUNKHWA

19 July, 2012.

19-July

2012

The Secretary to Govt. of Khyber Pakhtunkhwa,
Higher Education Archives & Libraries Department,
Peshawar.

Subject: -
Dear Sir,

REVISION OF 04-TIER FORMULA FOR COLLEGE TEACHERS.

I am directed to refer to your Department letter No. SO(C) / XI-11 / SACTA/2011 dated 15-06-2012 on the subject noted above and to state that consequent upon the approval of the competent authority, Finance Department agrees to the revision of the ratio of four tier formula from 1: 15: 34: 50 to 5: 20: 37: 38, for college teachers of the settled areas and to the up gradation of their sanctioned strength of 5, 077 posts in BPS-17 and above accordingly, as it stood on 01-07-2012, as per table given below, with effect from 01-07-2012 subject to the observance of all costal formalities.

Provincial Colleges Only

01-07-2012

| | Existing Position 01-07-2012 | | | Revised Position w.e.f 01-07-2012 | | | TOTAL ADDITION. | | |
|----------|------------------------------|--------|-------|-----------------------------------|--------|-------|-----------------|--------|-------|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| BPS-20 | 20 | 11 | 39 | 170 | 84 | 254 | 142 | 73 | 215 |
| BPS-19 | 441 | 190 | 631 | 681 | 334 | 1,015 | 240 | 144 | 384 |
| BPS-18 | 1,010 | 346 | 1,456 | 1,250 | 519 | 1,769 | 240 | 173 | 422 |
| BPS-17 | 1,925 | 1,026 | 2,951 | 1,294 | 636 | 1,930 | -631 | -390 | -1021 |
| G. Total | 3,404 | 1,673 | 5,077 | 3,484 | 1,673 | 5,077 | 0 | 0 | 0 |

Audit copy, indicating revised college wise distribution of posts, as per above table, (Male and Female separately) w.e.f 01-07-2012, may be prepared and submitted to this department for authentication.

I am further to inform that the case for revision of 4- tier formula for teachers of the colleges in FATA, may be taken up with Federal Government, through SAFRON, as these are being budgeted by the Federal Government and Finance Department may be informed of the out come accordingly.

Yours faithfully,

(Jamshid Khan Haleemzai)
BUDGET OFFICER-V

Encl: No. & date as above.

Copy forwarded to:-

- 1- The Director, Higher Education Archives & Libraries Khyber Pakhtunkhwa Peshawar
- 2- The Section Officer (FR) Finance Department.
- 3- Master File.

Handwritten signatures and initials at the bottom of the page.

BETTER COPY 13

GOVT: OF KHYBER PAKHTUNKHWA

The Secretary to Govt. of Khyber Pakhtunkhwa
Higher Education Archive, & Diuretics Department,
Peshawar

MU

Subject:- REVISION OF 04-TIER FOR "LA FOR
Dear Sir;

I am directed to refer to your department letter No. SO(C) / XI-U /SACTA/20111 dated 15-06-2012 on the subject noted above and to state that consequent upon the approval of the competent authority, Finance Department agree to the rejection of the ratio of tour formula from 1.15:34.50 to 5:20: 37:38, for collegeof the settled areas and to the up gradation of their sanctioned strength of 5,077. post in BIS-17 and above accordingly. As it stood on 01-03-2012 as per table given below. With effect from 01-07-2012.....

Provincial Colleges Only

| | Existing position 01.03.2012 | | | Revised position w.e.f. 04.07.2012 | | | TOTAL ADDITION | | |
|----------|---------------------------------|--------|-------|---------------------------------------|--------|-------|----------------|--------|-------|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| BPS-20 | 20 | 11 | 30 | 120 | 84 | 254 | 142 | 73 | 215 |
| BPS-19 | 441 | 190 | 631 | 681 | 334 | 1,015 | 240 | 144 | 384 |
| BPS-18 | 1,010 | 446 | 1,456 | 1259 | 619 | 1078 | 249 | 173 | 422 |
| BPS-17 | 1,925 | 1,026 | 2,951 | 1294 | 636 | 1,930 | -631 | -390 | -1021 |
| G. Total | 3,404 | 1,673 | 5,077 | 3,484 | 1,673 | 5,077 | 0 | 0 | 0 |

Audit copy, indicating revised college wise distribution of posts, as per above table, (Male and Female separately) w.e.f 01-07-2012, may be prepared and submitted to this department for authentication.

I am further to inform that the case for revision of 4- tier formula for teachers of the colleges FATA. May be taken up with Federal Government through SAFRON, as these are being budgeted by the Federal Government and Finance Department may be informed of the out come accordingly,

Yours Faithfully,
Sd/-
(Jamshid Khan Haleemzai)
BIDGET OFFICER-V

End: No & date as above.

Copy forwarded to:-

1. The Director, Higher Education Archives & Libraries Khyber Pakhtunkhwa Peshawar.
2. The Section Officer (FR) Finance Department.
3. Master File

HASSAN OKAFEDI
Advocate
High Court Peshawar



10/1/12

14

DIRECTORATE HIGHER EDUCATION
GOVERNMENT OF KHYBER PAKHTUNKHWA
Phone # 091-9210242, 9211025/Fax # 9210215

F.No. 18731-38
A/167/Promotion Cell/Estab.Branch

Dated Peshawar 6/08/2012

To

1. The Principal GPGC, Kohat
2. The Principal GPGC, Bannu
3. The Principal D.I.Khan

Subject:- TENTATIVE SENIORITY LIST OF ASSOCIATE PROFESSORS (BPS-19), MALE COLLEGE CADRE.

Memo:

I am directed to refer to the subject cited above and to enclose herewith a copy of tentative seniority list of Associate Professor (BPS-19) male of college cadre Higher Education Department with the request that the same may please be circulated amongst the following colleges of your jurisdiction, if there is any appeal against this seniority list the same may be sent to this office within 30 days positively. The said seniority list is also available on web-site www.pactahed-free-web.pk

- | | | |
|------------------------|--------------------------|-------------------------|
| 1. GDC, K.D.Kohat | 2. GDC, Lachi | 3. GDC, Gumbat Kohat |
| 4. GDC, Hangu | 5. GDC, Thall | 6. GPGC, Karak |
| 7. GDC, Ahmad Abad | 8. GDC, Sabirabad | 9. GDC, Takhti Nusrati |
| 10. Latamber | 11. GDC, Banda Daud Shah | 12. GDC, No.2 Bannu |
| 13. GDC, Ghoriwala | 14. GDC, S.K.Bala | 15. GDC, Kakki |
| 16. GDC, Domail | 17. Mamash Khel | 18. GDC, Landi Jalandar |
| 19. GPGC, Kakki | 20. GDC, Ghazni Khel | 21. GDC, Tajori |
| 22. GDC, Essak Khel | 23. GDC, Sarai Naurang | 24. GDC, No.1 D.I.Khan |
| 25. GDC, No.2 D.I.Khan | 26. GDC, No.3 D.I.Khan | 27. GDC, Paharpur |
| 28. GDC, Kulachi | 29. GDC, Paniala | 30. GDC, Parova |
| 31. GDC, Tank | 32. GDC, Ama Khel | |

DEPUTY DIRECTOR (Establishment)
HIGHER EDUCATION KHYBER PAKHTUNKHWA

Endst. No. _____

Copy of the above is forwarded to the Principals:-

- | | | |
|------------------------|--------------------------|-------------------------|
| 1. GDC, K.D.Kohat | 2. GDC, Lachi | 3. GDC, Gumbat Kohat |
| 4. GDC, Hangu | 5. GDC, Thall | 6. GPGC, Karak |
| 7. GDC, Ahmad Abad | 8. GDC, Sabirabad | 9. GDC, Takhti Nusrati |
| 10. Latamber | 11. GDC, Banda Daud Shah | 12. GDC, No.2 Bannu |
| 13. GDC, Ghoriwala | 14. GDC, S.K.Bala | 15. GDC, Kakki |
| 16. GDC, Domail | 17. Mamash Khel | 18. GDC, Landi Jalandar |
| 19. GPGC, Kakki | 20. GDC, Ghazni Khel | 21. GDC, Tajori |
| 22. GDC, Essak Khel | 23. GDC, Sarai Naurang | 24. GDC, No.1 D.I.Khan |
| 25. GDC, No.2 D.I.Khan | 26. GDC, No.3 D.I.Khan | 27. GDG, Paharpur |
| 28. GDC, Kulachi | 29. GDC, Paniala | 30. GDC, Parova |
| 31. GDC, Tank | 32. GDC, Ama Khel | |

DEPUTY DIRECTOR (Establishment)
HIGHER EDUCATION KHYBER PAKHTUNKHWA

HASSAN -J.K- AFRIDI
(Advocate)
High Court Peshawar

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10

UPDATE SENIORITY LIST OF ASSOCIATE PROFESSORS BPS-19(COLLEGE CADRE).
(MAEL)CORRECTED UPTO 31-07-2012 (Total Sanctioned posts=484

| S.No | Name of Officers with Qualification | Date of Birth/ Domicile | Date of 1st Entry in to Govt. Service | Date of Regular Appointment to the service/cadre. | Regular/Promotion to the present post. | | Mode of App: | Remarks |
|------|--|----------------------------|---|---|---|-----|---------------------|---------|
| | | | | | Date | BPS | | |
| 1 | Mr. Abdur Rahman M.Sc Botany, GPGC, Bannu | 06.03.1958 Bannu | 20.10.1982 | 20.10.1982 | 11.12.1999 | 19 | Promotion | |
| 2 | Muhammad Nafees M.A Pol: Science, Sari Naurang (Lakki Marwat) | 02.08.1956 Lakki | 14.11.1981 | 14.11.1981 | 11.12.1999 | 19 | Promotion | |
| 3 | Mr. Ghulam Sarwar M.Sc Maths, GPGC, Mandian (Abbottabad) | 21.01.1962 Abbottabad | 01.03.1986 | 01.03.1986 | 29.05.2000 | 19 | Initial Recruitment | |
| 4 | Mr. Muhammad Islam M.Sc Physics, Depuation Quality Edu (FATA) | 01.05.1954 Kohat | 23.05.1978 | 23.05.1978 | 29.05.2000 | 19 | Initial Recruitment | |
| 5 | Mr. Fazle Rabbi M.A English, Principal GPGC, Charsadda | 27.05.1957 Karak | 18.03.1982 | 28.01.1984 | 29.05.2000 | 19 | Initial Recruitment | |
| 6 | Mr. Abdul Latif Khan M.Sc Zoology, Principal GDC, Chitral | 03.03.1961 Dir | 10.05.1986 | 10.05.1986 | 29.05.2000 | 19 | Initial Recruitment | |

Attested
H.A. (Advocate)
High Court Peshawar

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| | | | | | | | |
|----|---|-------------------------|--------------------------|------------|------------|----|---------------------|
| 7 | Dr. Muhammad Anwar Chemistry, Principal GC Hayatabad. | 06.04.1953 Swabi | 11.01.1981 | 11.01.1981 | 28.03.2002 | 19 | Initial Recruitment |
| 8 | Muhammad Ali Khan M.A. Economics, GFGC, Lakki Marwat | 06.05.1961 Lakki | 25.03.1985 01.09.1990 | 01.09.1990 | 08.02.2003 | 19 | Promotion |
| 9 | Muhammad Sharif M.Sc. Botany, Principal Sikindar Kheal Bala, Bannu | 02.09.1953 Bannu | 01.02.1981 | 01.02.1981 | 08.02.2003 | 19 | Promotion |
| 10 | Mr. Aqil Shah M.Sc. Chemistry, Principal GDC, Ghari Kapoora Mardan | 06.04.1956 Mardan | 27.10.1980 | 14.10.1981 | 08.02.2003 | 19 | Promotion |
| 11 | Mr. Fazli Khuda M.Sc. Chemistry, GC Peshawar. | 20.06.1955 Charsadda | 11.11.1981 | 11.11.1981 | 08.02.2003 | 19 | Promotion |
| 12 | Muhammad Saeed M.Sc. Chemistry, GC Peshawar | 15.12.1959 D.I. Khan | 08.01.1986 | 06.01.1987 | 08.02.2003 | 19 | Promotion |
| 13 | Muhammad Pervez M.Sc. Botany, G.C. Mathra (Peshawar) | 01.11.1952 Charsadda | 29.03.1982 | 24.06.1984 | 08.02.2003 | 19 | Promotion |
| 14 | Mr. Amjad Ali M.A. Economics, Principal CC, Akora Khattak | 25.07.1957 Nowshera | 02.02.1984 | 02.02.1984 | 08.02.2003 | 19 | Promotion |
| 15 | Mr. Waheed-ur-Rehman M.Sc. Maths, Principal GC Wadpaga | 03.05.1956 Peshawar | 28.01.1984 | 28.01.1984 | 08.02.2003 | 19 | Promotion |
| 16 | Mr. Jehanzeb Khan M.A. Pak: Study, GPGC Kohat | 29.04.1958 NWA | 13.10.1984 | 04.10.1988 | 08.02.2003 | 19 | Promotion |
| 17 | Muhammad Jamil Khan M.Sc. Stats, GPGC, Kohat | 15.06.1955 Bannu | 20.12.1981 07.12.1983 | 17.05.1984 | 08.02.2003 | 19 | Promotion |

Promoted and
Retired

Attended
High Court Peshawar

| | | | | | | | |
|----|--|------------------------|--------------------------|------------|------------|----|-----------|
| 18 | S. Muddasir Shah F.A. English, Principal GC Battagram. | 12.06.1953 Mansehra | 31.05.1978 | 31.05.1978 | 08.02.2003 | 19 | Promotion |
| 19 | Dr. Gulshah Nawab M.A. Economics, GSSC, Peshawar | 12.05.1959 Dir | 28.09.1987 | 28.09.1987 | 08.02.2003 | 19 | Promotion |
| 20 | Muhammad Ali M.A. Pak Study, GC Khair Abad | 15.04.1957 Mardan | 27.11.1984 01.01.1986 | 01.01.1986 | 08.02.2003 | 19 | Promotion |
| 21 | Mr. Said Wali M.A. Economics, Principal GC, Latamber | 12.12.1959 Karak | 07.05.1986 | 29.03.1987 | 08.02.2003 | 19 | Promotion |
| 22 | Mr. Abdul Qayum M.Sc Stats, Chairman BISE Abbottabad | 14.10.1952 Malakand | 26.4.1975 | 28.01.1976 | 08.02.2003 | 19 | Promotion |
| 23 | Mr. Iqbal Ahmed Alizai M.A Pol Sc: GC No.1 D.I.Khan | 02.04.1953 D.I.Khan | 01.01.1976 | 28.01.1976 | 08.02.2003 | 19 | Promotion |
| 24 | Niamatullah M.Sc Maths GPGC Mansehra. | 15.06.1953 Hazara | 23.10.1976 | 23.10.1976 | 08.02.2003 | 19 | Promotion |
| 25 | Syed Subhanullah Shah M.Sc Chemistry, GDC, Hayatabad (Peshawar) | 01.04.1959 Nowshera | 01.11.1982 10.06.1985 | 10.06.1985 | 31.5.2003 | 19 | PSC |
| 26 | Dr. Ghulam Muhammad Ph.D Biology, GDC Puran. | 04.06.1955 Swat | 30.05.1984 | 30.05.1984 | 31.5.2003 | 19 | PSC |

*Presented as
fid*

Allocated
HASSAN-U.K. AFRIDI
 (Advocate)
 High Court Peshawar

8

| | | | | | | | |
|----|--|--------------------------|------------|------------|-----------|----|-----------|
| 27 | Mr Mumtaz Khan M.A English, G.P/G.C, Haripur | 01.01.1960 Abbottabad | 20.05.1987 | 23.01.1988 | 31.5.2003 | 19 | PSC |
| 28 | Mr Q. Yamin Khan M.Sc Zoology, GPCC, Bannu | 10.01.1953 F.R Bannu | 20.08.1977 | 20.08.1977 | 19.5.2004 | 19 | Promotion |
| 29 | Muhammad Mehmood M.A Pol: Science, G.C, Lakki. | 05.01.1953 Lakki | 31.08.1977 | 31.08.1977 | 19.5.2004 | 19 | Promotion |
| 30 | Mr. Laiq Hussain M.Sc Chemistry, G.C, Miran Shah | 15.10.1952 SWA | 22.08.1977 | 22.08.1977 | 19.5.2004 | 19 | Promotion |
| 31 | Mr. Taj Malook M.A Botany, G.C, Miran Shah | 07.09.1952 N.W.A | 21.08.1977 | 21.08.1977 | 19.5.2004 | 19 | Promotion |
| 32 | Mr.Hidayat Ullah M.A Pashto GC, Peshawar | 01.05.1954 Charsadda | 13.12.1977 | 13.12.1977 | 19.5.2004 | 19 | Promotion |
| 33 | Mr.Muhabat Khan M.A English, Principal GC, Lachi. | 20.04.1955 Kohat | 18.12.1977 | 18.12.1977 | 19.5.2004 | 19 | Promotion |
| 34 | Mr.Hafeezullah M.Sc Botany, Principal GC, Kakki | 25.12.1952 Bannu | 26.10.1978 | 26.10.1978 | 14.5.2005 | 19 | Promotion |
| 35 | Qazi Tahir Ali M.A Islamiyat, GDC, Havelian | 09.01.1953 Abbottabad | 29.01.1978 | 15.05.1978 | 14.5.2005 | 19 | Promotion |
| 36 | Mr.Imtiaz Ahmad M.A Pol: Science, G.C, Peshawar. | 23.11.1952 Peshawar | 24.10.1978 | 24.10.1978 | 14.5.2005 | 19 | Promotion |
| 37 | Mr.Anwar Parvez M.Sc Physics, GPCC, Mardan | 12.04.1953 Peshawar | 05.05.1978 | 05.05.1978 | 14.5.2005 | 19 | Promotion |
| 38 | Mr.Riaz Ahmad M.A Archeology, Principal GDC, Samar Bagh | 11.11.1953 Dir | 24.01.1978 | 15.05.1978 | 14.5.2005 | 19 | Promotion |

*Promoted and
believed to*

Attested
HASSAN ULLAH KHAN
High Court Peshawar

| | | | | | | | |
|----|--|----------------------|------------|------------|-----------|----|-----------|
| 39 | Mr. Nadir Shah M.A Econ. G.C. No. 1-D.I.Khan | 15.03.1953 Bannu | 04.11.1976 | 30.05.1978 | 14.5.2005 | 19 | Promotion |
| 40 | Mr. Iqbal Khan M.Sc Botany, Principal GDC Lessa Nawab | 01.11.1952 Hazara | 26.10.1980 | 26.10.1980 | 21-2-2007 | 19 | Promotion |
| 41 | Mr. Shamsul Islam M.A English, GPCC, Swabi. | 03.01.1955 Mardan | 17.01.1980 | 08.01.1981 | 21-2-2007 | 19 | Promotion |
| 42 | Mr. Ibrahim S/O Sharif Khan M.Sc Physics, G.C. Matta | 11.01.1955 Swat | 20.03.1980 | 08.01.1981 | 21-2-2007 | 19 | Promotion |
| 43 | Mr. Saïd Bahadar M.A English, Principal Alpuri | 02.03.1954 Dir | 25.01.1978 | 08.01.1981 | 21-2-2007 | 19 | Promotion |
| 44 | Gul Hassan M.A Philosophy, G.C. Timergar. | 07.11.1956 Dir | 21.01.1981 | 21.01.1981 | 21-2-2007 | 19 | Promotion |
| 45 | Mr. Hamidullah Khan M.A English, Text Book Board | 27.08.1956 Bannu | 19.12.1979 | 15.01.1981 | 21-2-2007 | 19 | Promotion |
| 46 | Muhammad Saeed M.Sc Chemistry, G.C. Timergara | 10.12.1952 Dir | 20.01.1981 | 20.01.1981 | 21-2-2007 | 19 | Promotion |
| 47 | Mr. Abdul Rashid M.Sc Physics, Principal Totalia | 20.01.1953 Swabi | 03.02.1981 | 03.02.1981 | 21-2-2007 | 19 | Promotion |

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Retired

Affected
 HASSAN - U.K. - AFRID
 High Court Advocate
 Peshawar


| | | | | | | | |
|----|---|----------------------------|------------|------------|-----------|----|-----------|
| 48 | Mr. Khan Sharaf M.Sc Physics, GPGC, Mardan | 03.03.1953 Mardan | 15.11.1981 | 15.11.1981 | 21-2-2007 | 19 | Promotion |
| 49 | Mr. Tariq Mohammad M.Sc Chemistry, GPGC, No.1 Abbottabad | 08.01.1958 Manshra | 12.11.1981 | 12.11.1981 | 21-2-2007 | 19 | Promotion |
| 50 | Mr. Mir Alam Khan M.Sc Stats, G.C, No.1 Mardan | 15.04.1953 Mardan | 31.05.1979 | 08.11.1981 | 21-2-2007 | 19 | Promotion |
| 51 | Mr. Raj Muhammad Khan M.Sc Physics, G.C, Nowshera | 15.11.1953 Nowshera | 15.09.1980 | 02.12.1981 | 21-2-2007 | 19 | Promotion |
| 52 | Muhammad Ismail M.Sc Maths, GJPGC, Swat | 02.11.1952 Swat | 26.01.1978 | 04.11.1981 | 21-2-2007 | 19 | Promotion |
| 53 | Mr. Mukhtair Ali M.Sc Chemistry, GSSC Peshawar | 09.12.1952 Charsadda | 06.11.1981 | 06.11.1981 | 21-2-2007 | 19 | Promotion |
| 54 | Mr. Sajjad Hussain M.Sc Chemistry, G.C. Parachinar | 08.02.1953 Kuram Agency | 25.04.1981 | 18.11.1981 | 21-2-2007 | 19 | Promotion |
| 55 | Mr. Raza Shah M.Sc Chemistry Principal GDC Gulabad | 20.06.1955 Malakand | 14.11.1981 | 14.11.1981 | 21-2-2007 | 19 | Promotion |
| 56 | Mr. Naveed Iqbal M.Sc Chemistry, GPGC, Kohat | 04.04.1957 Kohat | 12.11.1981 | 12.11.1981 | 21-2-2007 | 19 | Promotion |
| 57 | Muhammad Imran M.Sc Stats, GPGJC, Swat. | 06.04.1955 Swat | 16.11.1981 | 16.11.1981 | 21-2-2007 | 19 | Promotion |
| 58 | Mr. Mehboob Ur Rehman M.A Pashto, Principal Ahimadabad | 09.01.1957 Karak | 21.12.1981 | 21.12.1981 | 21-2-2007 | 19 | Promotion |
| 59 | Mr. Sayed Ahmad Jalil M.A Pashto, G.C No.2, Mardan | 10.04.1954 Mardan | 23.12.1981 | 23.12.1981 | 21-2-2007 | 19 | Promotion |
| 60 | Mr. Matiur Rehman M.Sc Maths, Principal G.C, Johar | 01.05.1954 Charsadda | 01.10.1980 | 21.05.1983 | 21-2-2007 | 19 | Promotion |
| 61 | Mr. Mehboob Ullah M.Sc Biology, G.C, Ekka Ghund | 20.08.1956 Charsadda | 01.06.1981 | 23.05.1983 | 21-2-2007 | 19 | Promotion |

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Promoted and Retired
on 11/11/2012

HASSAN-U-LLAH
High Court
15/11/2012

| | | | | | | | |
|----|---|--------------------------|------------|------------|-----------|----|-----------|
| | M.Sc Stats, GDC, Latambar (Karak) | Karak | | | | | |
| 63 | Mr. Ziaul Haq M.Sc Maths. G.C, Thana | 09.05.1955 Malakand | 21.03.1981 | 21.05.1983 | 21-2-2007 | 19 | Promotion |
| 64 | Mr. Kala Khan Awan M.A Pol: Sc., Additional Director (DHE) | 13.04.1956 Abbottabad | 01.10.1981 | 21.05.83 | 21-2-2007 | 19 | Promotion |
| 65 | Mr. Imtiaz Ahmad M.A Pol: Sc. G.C, Esak Khel Lakki | 01.01.1957 Lakki | 13.10.1981 | 21.05.1983 | 21-2-2007 | 19 | Promotion |
| 66 | Mr. Sharifulah M.A History, Principal G.C, Ghazni Khel | 21.03.1956 Lakki | 03.10.1981 | 21.05.1983 | 21-2-2007 | 19 | Promotion |
| 67 | Mr. Abidullah Jan M.Sc Phys.: GSSC, Peshawar. | 01.09.1957 Charsadda | 18.01.1983 | 21.01.1987 | 21-2-2007 | 19 | Promotion |
| 68 | Mr. Abdul Qayum M.A English GC, Balakot | 01.02.1956 Mansehra | 13.10.1981 | 25.01.1984 | 21-2-2007 | 19 | Promotion |
| 69 | Muhammad Nabi Shah M.A Economics, Principal GC, Takhti Nusrati | 11.10.1957 Karak | 18.10.1982 | 28.06.1984 | 21-2-2007 | 19 | Promotion |
| 70 | Mr. Mehar Zaman M.A Pak Study, GC Gandaf (Swabi) | 07.09.1957 Mardan | 22.10.1986 | 23.01.1988 | 21-2-2007 | 19 | Promotion |
| 71 | Mr. Mehmood Khan M.Sc Stats. GPGC, Bannu | 01.01.1958 Bannu | 17.11.1983 | 05.01.1987 | 21-2-2007 | 19 | Promotion |
| 72 | Muhammad Abdul Hayee M.A Urdu. G.C Pafarpur. | 14.04.1961 D.I.Khan | 27.09.1987 | 27.09.1987 | 21-2-2007 | 19 | Promotion |
| 73 | Muhammad Nazif M.Sc Chemistry, GPGC Charsadda | 15.01.1959 Charsadda | 17.06.1985 | 17.06.1985 | 21-2-2007 | 19 | Promotion |
| 74 | Mr. Abad Khan M.Sc Chemistry, G.C. Peshawar | 25.03.1957 Swabi | 06.01.1983 | 13.06.1985 | 21-2-2007 | 19 | Promotion |
| 75 | Muhammad Javed M.Sc Chemistry, GPGC NSR | 25.05.1958 Nowshera | 06.03.1991 | 06.03.1991 | 21-2-2007 | 19 | Promotion |
| 76 | Mr. Sher Zada M.Sc Chemistry, GC. Lachi Kohat | 16.01.1954 Dir | 27.05.1995 | 27.05.1995 | 21-2-2007 | 19 | Promotion |
| 77 | Dr. Muhammad Salim Ph.D Urdu, GDC, Totalia (Buner) | 02.10.1956 Swabi | 27.11.1983 | 21.1.1987 | 10.5-2008 | 19 | Promotion |


 HASSAN
 High School
 Peshawar

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| | | | | | | | |
|----|--|--------------------------|------------|------------|-----------|----|-----------|
| 78 | Mr. Gul Tiaz M.Sc Physics, G.C. Taji Lakki Marwat | 03.10.1956 Lakki | 04.02.1984 | 04.02.1984 | 10.5.2008 | 19 | Promotion |
| 79 | Mr. Mubarak Khan M.Sc Physics, GPCJC Swat | 04.06.1953 Swat | 29.01.1978 | 24.01.1984 | 10.5.2008 | 19 | Promotion |
| 80 | Mr. Abdul Raees Khan M.Sc Zoology, GDC Takht Nasrati | 05.06.1956 Karak | 01.10.1981 | 21.05.1983 | 10.5.2008 | 19 | Promotion |
| 81 | Mr. Karimullah M.A Pol.Sc, GDC, Chitral | 01.01.1963 Chitral | 24.09.1986 | 01.10.1989 | 10.5.2008 | 19 | Promotion |
| 82 | Mr. Akhtar Ali M.A Pol. Sc, GPGC, Hazipur | 10.07.1956 Lakki | 13.10.1981 | 24.01.1984 | 10.5.2008 | 19 | Promotion |
| 83 | Mr. Abdul Wahab M.Sc Zoology, On deputation Islamabad | 20.05.1960 Swat | 12.11.1987 | 23.01.1988 | 10.5.2008 | 19 | Promotion |
| 84 | Mr. Zoq Akhtar M.Sc Physics, Controller Hazara University | 11.06.1956 Abbottabad | 08.11.1983 | 04.01.1987 | 10.5.2008 | 19 | Promotion |
| 85 | Mr. Safiullah Khan M.A Economics, GPGC, Bannu | 01.10.1958 Bannu | 28.10.1978 | 28.06.1984 | 10.5.2008 | 19 | Promotion |
| 86 | Mr. Ashfaq Ali Khan M.Sc Biology, GPGC, Bannu | 15.08.1957 Bannu | 23.10.1986 | 23.01.1988 | 10.5.2008 | 19 | Promotion |
| 87 | Mr. Zafrullah Khan M.A English, GPGC, Mardan. | 01.11.1960 F.R. Bannu | 13.11.1985 | 01.02.1987 | 10.5.2008 | 19 | Promotion |
| 88 | Mr. Mir Zaman M.A Economics, Principal G.C, No2 Mardan | 03.09.1957 Dir | 02.03.1983 | 25.06.1984 | 10.5.2008 | 19 | Promotion |
| 89 | Mr. Niaz Muhammad M.A Pak. Std. G.C Takhtbhai | 12.10.1958 Peshawar | 07.07.1979 | 23.10.1986 | 10.5.2008 | 19 | Promotion |

Ahmed
HASSAN ULLAH AFZALI
 High Court Peshawar

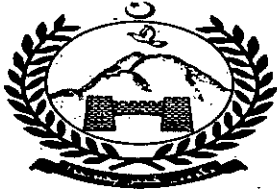
| | | | | | | | |
|-----|---|-------------------------|------------|------------|-----------|----|-----------|
| | Mr. Mujeeb Rehman M.A English, GPGC, Karak | 02.01.1960 Karak | 10.01.1987 | 10.01.1987 | 10.5.2008 | 19 | Promotion |
| 91 | Mr. Zahid Tariq M.A English, Project Manager Unit DHE | 03.01.1960 Haripur | 23.10.1986 | 01.09.1987 | 10.5.2008 | 19 | Promotion |
| 92 | Mr. Ghulam Farooq M.A English, GPGC, Charsadda | 01.01.1958 Charsadda | 04.10.1984 | 04.10.1984 | 10.5.2008 | 19 | Promotion |
| 93 | Muhammad Arshad M.A Pak.Std. GC, No. 2 Bannu | 01.04.1958 Bannu | 23.10.1986 | 23.01.1988 | 10.5.2008 | 19 | Promotion |
| 94 | Muhammad Nawaz M.Sc Stats, GDC, Darazinda (FR D.I.Khan) | 02.02.1959 Haripur | 12.11.1987 | 12.11.1987 | 10.5.2008 | 19 | Promotion |
| 95 | Mr. Mashal Khan M.A English, Principal GDC, Sari Naurang | 01.04.1954 Bannu | 13.12.1981 | 24.05.1983 | 10.5.2008 | 19 | Promotion |
| 96 | Mr. Miraj Khan M.A English, GPGC, Mardan | 02.07.1955 Mardan | 08.06.1981 | 21.05.1983 | 10.5.2008 | 19 | Promotion |
| 97 | Mr. Nazir Muhammad M.Sc Maths, GC, Peshawar | 07.01.1953 Charsadda | 01.06.1983 | 01.06.1983 | 10.5.2008 | 19 | Promotion |
| 98 | Mr. Jan Afzal M.Sc Stats, Principal GC, Tangi. | 12.06.1954 Charsadda | 22.12.1979 | 31.05.1983 | 10.5.2008 | 19 | Promotion |
| 99 | Mr. Masood Khan M.Sc Chemistry, Principal GDC, Shabqadar (Charsadda) | 28.06.1955 Peshawar | 31.05.1983 | 31.05.1983 | 10.5.2008 | 19 | Promotion |
| 100 | Mr. Dil Nawab M.Sc Stats, GDC, Sabir Abad Karak | 09.04.1958 Karak | 03.03.1982 | 21.05.1983 | 10.5.2008 | 19 | Promotion |
| 101 | Mr. Taj Bahadar M.Sc Stats, GC, Peshawar | 13.03.1954 Swabi | 05.11.1980 | 01.06.1983 | 10.5.2008 | 19 | Promotion |
| 102 | Mr. Mati Ullah M.A Islamiyat, Arabic, GDC Hayatabad Peshawar | 25.04.1954 Charsadda | 01.10.1981 | 04.01.1984 | 10.5.2008 | 19 | Promotion |
| 103 | Mr. Mumtaz Khan M.A Islamiyat, Arabic, G.C, Peshawar | 12.01.1953 Peshawar | 01.10.1972 | 16.01.1984 | 10.5.2008 | 19 | Promotion |
| 104 | Mr. Gul Zar Ahmad M.Sc Botany, GDC, Batkhela (MKD) | 08.02.1954 Dir | 15.01.1984 | 15.01.1984 | 10.5.2008 | 19 | Promotion |
| 105 | Mr. Ghulam Jan M.A Islamiyat, Arabic, G.C, Paharpur | 10.05.1957 Bannu | 14.01.1984 | 14.01.1984 | 10.5.2008 | 19 | Promotion |

23

Handwritten signature and stamp:
HASSAN
High Commission Peshawar

26

TO BE SUBMITTED FOR THE SAME NUMBER & DATE.



GOVERNMENT OF
KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES & LIBRARIES
DEPARTMENT

Dated Peshawar the 07/06/2012

NOTIFICATION.

NO.SO(C-I)HE/1-7/2012/KC. / 2628-31 The Competent Authority has been pleased to accord sanction to the Leave Encashment of 365-days in Lieu of L.P.R. in respect of Mr. Muzafar Iqbal, Associate Professor in Mathematics (BPS-19), Govt; Postgraduate College Kohat, under the provision of Rule-20 of Revised Leave Rules-1981.

The officer concerned has been retired from Government service with effect from 09-08-2012 (A.N) on attaining the age of superannuation.

SECRETARY
HIGHER EDUCATION DEPARTMENT

Endst: No. & Date as above.

Copy forwarded to the :-

1. Director Higher Education Khyber Pakhtunkhwa, Peshawar, w/r to his letters No.4836/CA-I/Estt; Branch/A-12/Muzafar Iqbq/ Maths, dated 27/02/2013.
2. Principal, Govt; Postgraduate College Kohat.
3. District Accounts Officer, Kohat.
4. Officer concerned.

Asso. Prof: Asstt: Prof:
Lect: in
G. P. G. C. Kohat.

(Mohammad Farooq Shah)
SECTION OFFICER (C-I)

25



GOVERNMENT OF
KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES & LIBRARIES
DEPARTMENT

NO.SO(C-I)/HE/1-7/12/Muzafar Iqbal
Dated Peshawar the 18/02/2013

To

The Director,
Higher Education,
Khyber Pakhtunkhwa, Peshawar.

Subject:- APPEAL.

I am directed to enclose herewith a copy of self-explanatory application dated 22/01/2013, from Mr. Muzafar Iqbal, Ex-Associate Professor Govt; Postgraduate College Kohat, on the subject cited above, for inclusion of his name in the coming promotion notification under new 4-tier formula, for comments, please.

Encls:- As above.

Sd/

(Mohammad Farooq Shah)
SECTION OFFICER (C-I)

Muzafar Iqbal

MUSAFAR IQBAL - AFRIDI
(Advocate)
High Court Peshawar

9/4/13

13/2/13

~~26~~
26

To

Secretary
Higher Education KPK
Peshawar

Subject : APPEAL

Sir

Few lines are submitted for perusal please.

- 1-Name MUZAFFAR IQBAL
 - 2-Designation, Associate professor/Principal of G.D.C Dara Adam Khel F.R Kohat
 - 3-Date of Retirement 04-08-2012
- My seniority no. is 68 in the seniority list published on 27-04-2011.

It is therefore requested that my name may please be included in the next promotion notification under new 4-tier formula and obliged.

Thank you very much Sir

Yours obediently servant

Muzaffar Iqbal

OK
[Signature]
High Court Peshawar
Advocate

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 905/2013

Mr. Muzaffar Iqbal Appellant

VS

Secretary Higher Education & others..... Respondents

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H. Rawat
Respondents 18/3/2018

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.**Service Appeal 905/2013**

Mr. Muzaffar Iqbal..... Appellant

VERSUS

Govt of Khyber Pakhtunkhwa through Secretary Higher Education

..... Respondents.

SUBJECT : **PARAWISE COMMENTS:-****PRELIMINARY OBJECTIONS:-**

Respectfully Sheweth:-

1. That the appellant has no locus standi to file the instant appeal.
2. That the appellant has not come to the Tribunal with clean hands.
3. That the appeal is time barred.
4. That the appellant has concealed material facts from the Hon'able Tribunal.
5. That the Hon'able Tribunal lacks jurisdiction to entertain the instant appeal.
6. That the appeal is based on misconception, misstatement hence liable to be dismissed.

REPLY ON FACTS:-

1. Pertains to record.
2. No comments from the answering respondent as it relates to his career.
3. Pertains to record.
4. Pertains to record.
5. Correct.
6. Not Admitted. As the appellant was due for retirement (superannuation) in the coming 03 days as such there was no need to retain his name in the seniority list, so the respondent department deleted his name from the tentative seniority list. (Annexure-A).
7. Correct to the extent that appellants retired on 09/08/2012, hence his application for inclusion of his name in seniority list after retirement was not maintainable.

ON GROUNDS:-

- A. Incorrect. Seniority lists are well prepared according to prevalent rules and regulations, and do not need any review as the same was issued as per rules and the appellants was not included as he stood retired earlier.
- B. Pertains to record.
- C. Correct to the extent that the Government of Khyber Pakhtunkhwa issued revised 04 tier formula, however the appellant stood retired before the approval of seniority list. So he cannot be promoted after retirement.
- D. Already explained in Para-C.
- E. Already explained in Para-C, hence need no comments.

- F. Incorrect. All the Associate Professors mentioned were not retired. Their names existed in the approved seniority list of dated 06/08/2012(Annexure-A).
- G. Incorrect. No one can ask for promotion after retirement.
- H. Correct to the extent that seniority is a vested right but it does not remain intact with the retirement of person, ~~his~~ name ~~is~~ omitted from it.
- I. Incorrect. Seniority lists is prepared by the department, then it is circulated tentatively, afterwards final approval seniority list is issued after removing all objections of whatsoever nature from the aggrieved applicants. Hence DD (establishment) has rightly prepared and circulated the tentative seniority list.
- J. That the respondent seeks permission of this Hon'able Tribunal to advance additional grounds at the time of arguments.

PRAYERS:-

It is therefore, humbly prayed that the appeal may graciously be dismissed with costs.

Chief Secretary Khyber Pakhtunkhwa
Respondent No.1

Secretary Higher Education Department
Khyber Pakhtunkhwa Respondent No.2

Secretary Establishment Department
Respondent No.3

Director Higher Education
Khyber Pakhtunkhwa, Peshawar
Respondent No.4

Deputy Director Higher Education
Khyber Pakhtunkhwa, Peshawar
Respondent

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR,**Service Appeal 905/2013**

Mr. Muzaffar Iqbal..... Appellant

VERSUS

Govt of Khyber Pakhtunkhwa through Secretary Higher Education..... Respondents.

SUBJECT:- REPLY TO STAY APPLICATION.**PRELIMINARY OBJECTIONS:-**

Respectfully Sheweth:-

1. That the applicant got no cause of action to file the present application.
2. That the present application is not maintainable in the present form.
3. That the present application is time barred.
4. That the applicant has not come to the Hon'able Tribunal with clean hands.

ON FACTS.

1. Pertains to record however the applicant has no chance to succeed.
2. Incorrect and denied, the applicant has got no cause of action to file the present appeal, as explained above.
3. Incorrect and denied as the applicant retired on 09/08/2012, hence his application for inclusion of his name in the seniority list after retirement was not maintainable.
4. Incorrect and denied as already explained in preceding paras however, there is no question of irreparable loss as even the main appeal is not maintainable according to law.
5. Need no reply.


PRAYER

It is therefore, humbly prayed that the stay application is not maintainable, hence may graciously be dismissed.

Chief Secretary Khyber Pakhtunkhwa
Respondent No.1

Secretary Higher Education Department
Khyber Pakhtunkhwa Respondent No.2

Secretary Establishment Department
Respondent No.3


Director Higher Education
Khyber Pakhtunkhwa, Peshawar
Respondent No.4

Deputy Director Higher Education
Khyber Pakhtunkhwa, Peshawar
Respondent No.5

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 905/2013

Mr. Muzaffar Iqbal Appellant

VS

Secretary Higher Education & others..... Respondents

AFFIDAVIT

I Irfan Ullah Khan Assistant Director Litigation Higher Education Department do hereby declare and affirm on oath that the contents of Para Wise Comments are correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'able Court.

Irfan Ullah Khan
Deponent 18/3/2016

CNIC No.11101-6409112-3

Identify by



Annex A

5
12

Tentative

DIRECTORATE HIGHER EDUCATION
GOVERNMENT OF KHYBER PAKHTUNKHWA

Phone # 091-9210242, 9211025/Fax # 9210215

E.No. 10731-30
To: 167/Promotion Cell/Estab.Branch

Dated Peshawar 6/08/2012

1. The Principal GPGC, Kohat
2. The Principal GPGC, Bannu
3. The Principal D.I.Khan

Subject:-

TENTATIVE SENIORITY LIST OF ASSOCIATE PROFESSORS (BPS-19)
MALE COLLEGE CADRE

Memo:

I am directed to refer to the subject cited above and to enclose herewith a copy of tentative seniority list of Associate Professor (BPS-19) male of college cadre Higher Education Department with the request that the same may please be circulated amongst the following colleges of your jurisdiction, if there is any appeal against this seniority list the same may be sent to this office within 30 days positively. The said seniority list is also available on web-site www.pactahed-free.web.pk

- | | | |
|------------------------|--------------------------|-------------------------|
| 1. GDC, K.D.Kohat | 2. GDC, Lachi | 3. GDC, Gumbat Kohat |
| 4. GDC, Hangu | 5. GDC, Thali | 6. GPGC, Karak |
| 7. GDC, Ahmad Abad | 8. GDC, Sabirabad | 9. GDC, Takhti Nusrati |
| 10. Latamber | 11. GDC, Banda Daud Shah | 12. GDC, No.2 Bannu |
| 13. GDC, Ghoriwala | 14. GDC, S.K.Bala | 15. GDC, Kakki |
| 16. GDC, Domail | 17. Mamash Khel | 18. GDC, Landi Jalandar |
| 19. GPGC, Kakki | 20. GDC, Ghazni Khel | 21. GDC, Tajori |
| 22. GDC, Essak Khel | 23. GDC, Sarai Naurang | 24. GDC, No.1 D.I.Khan |
| 25. GDC, No.2 D.I.Khan | 26. GDC, No.3 D.I.Khan | 27. GDC, Paharpur |
| 28. GDC, Kulachi | 29. GDC, Paniala | 30. GDC, Parova |
| 31. GDC, Tank | 32. GDC, Ama Khel | |

U

DEPUTY DIRECTOR (Establishment)
HIGHER EDUCATION KHYBER PAKHTUNKHWA

Endst. No. _____

Copy of the above is forwarded to the Principals:-

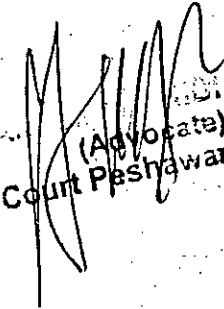
- | | | |
|------------------------|--------------------------|-------------------------|
| 1. GDC, K.D.Kohat | 2. GDC, Lachi | 3. GDC, Gumbat Kohat |
| 4. GDC, Hangu | 5. GDC, Thali | 6. GPGC, Karak |
| 7. GDC, Ahmad Abad | 8. GDC, Sabirabad | 9. GDC, Takhti Nusrati |
| 10. Latamber | 11. GDC, Banda Daud Shah | 12. GDC, No.2 Bannu |
| 13. GDC, Ghoriwala | 14. GDC, S.K.Bala | 15. GDC, Kakki |
| 16. GDC, Domail | 17. Mamash Khel | 18. GDC, Landi Jalandar |
| 19. GPGC, Kakki | 20. GDC, Ghazni Khel | 21. GDC, Tajori |
| 22. GDC, Essak Khel | 23. GDC, Sarai Naurang | 24. GDC, No.1 D.I.Khan |
| 25. GDC, No.2 D.I.Khan | 26. GDC, No.3 D.I.Khan | 27. GDG, Paharpur |
| 28. GDC, Kulachi | 29. GDC, Paniala | 30. GDC, Parova |
| 31. GDC, Tank | 32. GDC, Amu Khel | |

AG

DEPUTY DIRECTOR (Establishment)
HIGHER EDUCATION KHYBER PAKHTUNKHWA

UPDATE SENIORITY LIST OF ASSOCIATE PROFESSORS BPS-19(COLLEGE CADRE).
(MAEL)CORRECTED UPTO 31-07-2012 (Total Sanctioned posts=484)

| S.No | Name of Officers with Qualification | Date of Birth/ Domicile | Date of 1st Entry in to Govt. Service | Date of Regular Appointment to the service/cadre. | Regular/Promotion to the present post. | | Mode of App: | Remarks |
|------|--|----------------------------|---|---|---|-----|---------------------|---------|
| | | | | | Date | BPS | | |
| 1 | Mr. Abdur Rahman M.Sc Botany, GPGC, Bannu | 06.03.1958 Bannu | 20.10.1982 | 20.10.1982 | 11.12.1999 | 19 | Promotion | |
| 2 | Muhammad Nafees M.A Pol: Science, Sari Naurang (Lakki Marwat) | 02.08.1956 Lakki | 14.11.1981 | 14.11.1981 | 11.12.1999 | 19 | Promotion | |
| 3 | Mr. Ghulam Sarwar M.Sc Maths, GPGC, Mandian (Abbottabad) | 21.01.1962 Abbottabad | 01.03.1986 | 01.03.1986 | 29.05.2000 | 19 | Initial Recruitment | |
| 4 | Mr. Muhammad Islam M.Sc Physics, Depuation Quality Edu.(FATA) | 01.05.1954 Kohat | 23.05.1978 | 23.05.1978 | 29.05.2000 | 19 | Initial Recruitment | |
| 5 | Mr. Fazle Rabbi M.A English, Principal GPGC, Charsadda | 27.05.1957 Karak | 18.03.1982 | 28.01.1984 | 29.05.2000 | 19 | Initial Recruitment | |
| 6 | Mr. Abdul Latif Khan M.Sc Zoology, Principal GDC, Chitral | 03.03.1961 Dir | 10.05.1986 | 10.05.1986 | 29.05.2000 | 19 | Initial Recruitment | |

Attested

 (Advocate)
 High Court Peshawar

| | | | | | | | |
|----|---|-------------------------|--------------------------|------------|------------|----|---------------------|
| 7 | Dr. Muhammad Arwar M.Sc. Chemistry, Principal GC Hayatabad. | 06.01.1953 Swabi | 11.01.1981 | 11.01.1981 | 28.03.2002 | 19 | Initial Recruitment |
| 8 | Muhammad Ali Khan M.A. Economics, GFGC, Lakki Marwat | 06.03.1961 Lakki | 25.03.1985 01.09.1990 | 01.09.1990 | 08.02.2003 | 19 | Promotion |
| 9 | Muhammad Sharif M.Sc. Botany, Principal Sikandar Kheal Bala, Bannu | 02.09.1953 Bannu | 01.02.1981 | 01.02.1981 | 08.02.2003 | 19 | Promotion |
| 10 | Mr. Aqil Shah M.Sc. Chemistry, Principal GDC, Ghari Kapoora Mardan | 06.01.1956 Mardan | 27.10.1980 | 14.10.1981 | 08.02.2003 | 19 | Promotion |
| 11 | Mr. Fazli Khuda M.Sc. Chemistry, GC Peshawar. | 20.06.1955 Charsadda | 11.11.1981 | 11.11.1981 | 08.02.2003 | 19 | Promotion |
| 12 | Muhammad Saeed M.Sc. Chemistry, GC Peshawar | 15.12.1959 D.I. Khan | 08.01.1986 | 06.01.1987 | 08.02.2003 | 19 | Promotion |
| 13 | Muhammad Pervez M.Sc. Botany, G.C. Mathra (Peshawar) | 01.11.1952 Charsadda | 29.03.1982 | 24.06.1984 | 08.02.2003 | 19 | Promotion |
| 14 | Mr. Amjad Ali M.A. Economics, Principal GC, Akora Khattak | 25.07.1957 Nowshera | 02.02.1984 | 02.02.1984 | 08.02.2003 | 19 | Promotion |
| 15 | Mr. Waheed-ur-Rehman M.Sc. Maths, Principal GC Wadpaga | 03.05.1956 Peshawar | 28.01.1984 | 28.01.1984 | 08.02.2003 | 19 | Promotion |
| 16 | Mr. Jehanzeb Khan M.A. Pak. Study, GFGC Kohat | 29.01.1958 NWA | 13.10.1984 | 04.10.1988 | 08.02.2003 | 19 | Promotion |
| 17 | Muhammad Jamil Khan M.Sc. Stats, GFGC, Kohat | 15.06.1955 Bannu | 20.12.1981 07.12.1983 | 17.05.1984 | 08.02.2003 | 19 | Promotion |

Promoted and Retired

Attended
High Court Peshawar

| | | | | | | | |
|----|--|------------------------|--------------------------|------------|------------|----|-----------|
| 18 | S. Muddasir Shah M.A. English, Principal GC Battagram. | 12.06.1953 Mansehra | 31.05.1978 | 31.05.1978 | 08.02.2003 | 19 | Promotion |
| 19 | Dr. Afzal Nawab M.A. Economics, GSSC, Peshawar | 12.05.1959 Dir | 28.09.1987 | 28.09.1987 | 08.02.2003 | 19 | Promotion |
| 20 | Muhammad Ali M.A. Pak.Study, GC Khair Abad | 15.04.1957 Mardan | 27.11.1981 01.01.1986 | 01.01.1986 | 08.02.2003 | 19 | Promotion |
| 21 | Mr. Said Wali M.A. Economics, Principal GC, Latamber | 12.12.1959 Karak | 07.05.1986 | 29.03.1987 | 08.02.2003 | 19 | Promotion |
| 22 | Mr. Abdul Qayum M.Sc Stats, Chairman BISE Abbottabad | 14.10.1952 Malikand | 26.4.1975 | 28.01.1976 | 08.02.2003 | 19 | Promotion |
| 23 | Mr. Iqbal Ahmed Alizai M.A Pol. Sc: GC No. I D I Khan | 02.01.1953 D.I.Khan | 01.01.1976 | 28.01.1976 | 08.02.2003 | 19 | Promotion |
| 24 | Niamatullah M.Sc Maths GPGC Mansehra. | 15.06.1953 Hazara | 23.10.1976 | 23.10.1976 | 08.02.2003 | 19 | Promotion |
| 25 | Syed Subhanullah Shah M.Sc Chemistry, GDC, Hayatabad (Peshawar) | 01.04.1959 Nowshera | 01.11.1982 10.06.1985 | 10.06.1985 | 31.5.2003 | 19 | ISC |
| 26 | Dr. Ghulam Muhammad Ph.D Biology, GDC Piran. | 01.06.1955 Swat | 30.05.1984 | 30.05.1984 | 31.5.2003 | 19 | ISC |



*Promoted by
P/d*

Allocated
HASSAN-U.R. AFRIDI
High Court Peshawar

| | | | | | | | |
|----|---|--------------------------|------------|------------|-----------|----|-----------|
| 27 | Mr. Mumtaz Khan M.A. English, G.P/G.C. Haripur | 01.01.1960 Abbottabad | 20.05.1987 | 23.01.1988 | 31.5.2003 | 19 | ISC |
| 28 | Mr. Q. Yam Khan M.Sc Zoology, GPGC, Bannu | 10.01.1953 F.R Bannu | 20.08.1977 | 20.08.1977 | 19.5.2001 | 19 | Promotion |
| 29 | Muhammad Mehmood M.A Pol: Science, G.C, Lakki. | 05.01.1953 Lakki | 31.08.1977 | 31.08.1977 | 19.5.2001 | 19 | Promotion |
| 30 | Mr. Lalq Hussain M.Sc Chemistry, G.C, Miran Shah | 15.10.1952 SWA | 22.08.1977 | 22.08.1977 | 19.5.2001 | 19 | Promotion |
| 31 | Mr. Taj Malook M.A Botany, G.C, Miran Shah | 07.09.1952 N.W.A | 21.08.1977 | 21.08.1977 | 19.5.2001 | 19 | Promotion |
| 32 | Mr. Hidayat Ullah M.A Pashto GC, Peshawar | 01.05.1954 Charsadda | 13.12.1977 | 13.12.1977 | 19.5.2001 | 19 | Promotion |
| 33 | Mr. Muhabat Khan M.A English, Principal GC, Lachi. | 20.01.1955 Kohat | 18.12.1977 | 18.12.1977 | 19.5.2001 | 19 | Promotion |
| 34 | Mr. Hafeezullah M.Sc Botany, Principal GC, Kakki | 25.12.1952 Bannu | 26.10.1978 | 26.10.1978 | 14.5.2005 | 19 | Promotion |
| 35 | Qazi Tahir Ali M.A Islamiyat, GDC, Havelian | 09.01.1953 Abbottabad | 29.01.1978 | 15.05.1978 | 14.5.2005 | 19 | Promotion |
| 36 | Mr. Imtiaz Ahmad M.A Pol: Science, G.C, Peshawar. | 23.11.1952 Peshawar | 24.10.1978 | 24.10.1978 | 14.5.2005 | 19 | Promotion |
| 37 | Mr. Anwar Parvez M.Sc Physics, GPGC, Mardan | 12.01.1953 Peshawar | 05.05.1978 | 05.05.1978 | 14.5.2005 | 19 | Promotion |
| 38 | Mr. Riaz Ahmad M.A Archeology, Principal GDC, Samar Bagh | 11.11.1953 Dir | 24.01.1978 | 15.05.1978 | 14.5.2005 | 19 | Promotion |

*Promoted and
Relieved*

AHerted
HASSAN ULLAH NEFEDI
High Court Peshawar



Retired

| | | | | | | | |
|----|--|----------------------|------------|------------|-----------|----|-----------|
| 39 | Mr. Nadir Shah M.A Econ. G.C. No. 1 D I Khan | 15.03.1953 Bannu | 01.11.1976 | 30.05.1978 | 14.3.2005 | 19 | Promotion |
| 40 | Mr. Iqbal Khan M.Sc Botany, Principal GDC Lessa Nawab | 01.11.1952 Hazara | 26.10.1980 | 26.10.1980 | 21-2-2007 | 19 | Promotion |
| 41 | Mr. Shamsul Islam M.A English, GPGC, Swabi | 03.01.1955 Mardan | 17.01.1980 | 08.01.1981 | 21-2-2007 | 19 | Promotion |
| 42 | Mr. Ibrahim S/O Sharif Khan M.Sc Physics, G.C. Matta | 11.01.1955 Swat | 20.03.1980 | 08.01.1981 | 21-2-2007 | 19 | Promotion |
| 43 | Mr. Said Bahadar M.A English, Principal Alpuri | 02.03.1951 Dir | 25.01.1978 | 08.01.1981 | 21-2-2007 | 19 | Promotion |
| 44 | Gul Hassan M.A Philosophy, G.C. Timergar. | 07.11.1956 Dir | 21.01.1981 | 21.01.1981 | 21-2-2007 | 19 | Promotion |
| 45 | Mr. Hamidullah Khan M.A English, Text Book Board | 27.08.1956 Bannu | 19.12.1979 | 15.01.1981 | 21-2-2007 | 19 | Promotion |
| 46 | Muhammad Saeed M.Sc Chemistry, G.C. Timergara | 10.12.1952 Dir | 20.01.1981 | 20.01.1981 | 21-2-2007 | 19 | Promotion |
| 47 | Mr. Abdur Rashid M.Sc Physics, Principal Totalia | 20.01.1953 Swabi | 03.02.1981 | 03.02.1981 | 21-2-2007 | 19 | Promotion |

A. Hafeez
 HASSAN - U.K. - AFRID
 Advocate
 High Court Peshawar

| | | | | | | | |
|----|---|----------------------------|------------|------------|-----------|----|-----------|
| 48 | Mr. Khan Sharaf M.Sc Physics, GPGC, Mardan | 03.03.1953 Mardan | 15.11.1981 | 15.11.1981 | 21-2-2007 | 19 | Promotion |
| 49 | Mr. To, Mohammad M.Sc Chemistry, GPGC, No.1 Abbottabad | 08.01.1958 Mansehra | 12.11.1981 | 12.11.1981 | 21-2-2007 | 19 | Promotion |
| 50 | Mr. Mir Alam Khan M.Sc Stats, G.C, No.1 Mardan | 15.04.1953 Mardan | 31.05.1979 | 08.11.1981 | 21-2-2007 | 19 | Promotion |
| 51 | Mr. Raj Muhammad Khan M.Sc Physics, G.C, Nowshera | 15.11.1953 Nowshera | 15.09.1980 | 02.12.1981 | 21-2-2007 | 19 | Promotion |
| 52 | Muhammad Ismail M.Sc Maths, GPGC, Swat | 02.11.1952 Swat | 26.01.1978 | 04.11.1981 | 21-2-2007 | 19 | Promotion |
| 53 | Mr. Mukhtair Ali M.Sc Chemistry, GSSC Peshawar | 09.12.1952 Charsadda | 06.11.1981 | 06.11.1981 | 21-2-2007 | 19 | Promotion |
| 54 | Mr. Sajjad Hussain M.Sc Chemistry, G.C. Parachinar | 08.02.1953 Kuram Agency | 25.04.1981 | 18.11.1981 | 21-2-2007 | 19 | Promotion |
| 55 | Mr. Raza Shah M.Sc Chemistry Principal GDC Gulabad | 20.06.1955 Malakand | 14.11.1981 | 14.11.1981 | 21-2-2007 | 19 | Promotion |
| 56 | Mr. Naveed Iqbal M.Sc Chemistry, GPGC, Kohat | 04.04.1957 Kohat | 12.11.1981 | 12.11.1981 | 21-2-2007 | 19 | Promotion |
| 57 | Muhammad Imran M.Sc Stats, GPGC, Swat. | 06.04.1955 Swat | 16.11.1981 | 16.11.1981 | 21-2-2007 | 19 | Promotion |
| 58 | Mr. Mehboob Ur Rehman MA Pashto, Principal Ahmadabad | 09.01.1957 Karak | 21.12.1981 | 21.12.1981 | 21-2-2007 | 19 | Promotion |
| 59 | Mr. Sayed Ahmad Jalal MA Pashto, G.C No.2, Mardan | 10.04.1954 Mardan | 23.12.1981 | 23.12.1981 | 21-2-2007 | 19 | Promotion |
| 60 | Mr. Matiur Rehman M.Sc Maths, Principal G.C, Johar | 01.05.1954 Charsadda | 01.10.1980 | 21.05.1983 | 21-2-2007 | 19 | Promotion |
| 61 | Mr. Mehboob Ullah M.Sc Biology, G.C, Ekka Ghind | 20.08.1956 Charsadda | 01.06.1981 | 23.05.1983 | 21-2-2007 | 19 | Promotion |

*Promoted and Retired
on 11/11/2012*

Attest
MASSAN-U-
HIGH COURT

| | | Karak | | | | | |
|----|---|--------------------------|------------|------------|-----------|----|-----------|
| | M.Sc Stats, GDC, Latambar (Karak) | | | | | | |
| 63 | Mr. Ziaul Haq M.Sc Maths. G.C, Thana | 09.05.1955 Malakand | 21.03.1981 | 21.05.1983 | 21-2-2007 | 19 | Promotion |
| 64 | Mr. Kala Khan Awan M.A Pol. Sc, Additional Director (DHE) | 13.04.1956 Abbottabad | 01.10.1981 | 21.05.83 | 21-2-2007 | 19 | Promotion |
| 65 | Mr. Imtiaz Ahmad M.A Pol. Sc. G.C, Esak Khel Lakki. | 01.01.1957 Lakki | 13.10.1981 | 21.05.1983 | 21-2-2007 | 19 | Promotion |
| 66 | Mr. Sharifullah M.A History, Principal G.C, Ghazni Khel | 21.03.1956 Lakki | 03.10.1981 | 21.05.1983 | 21-2-2007 | 19 | Promotion |
| 67 | Mr. Abidullah Jan M.Sc.Phys. GSSC, Peshawar. | 01.09.1957 Charsadda | 18.01.1983 | 21.01.1987 | 21-2-2007 | 19 | Promotion |
| 68 | Mr. Abdul Qayum M.A English GC, Balakot | 01.02.1956 Mansehra | 13.10.1981 | 25.01.1984 | 21-2-2007 | 19 | Promotion |
| 69 | Munammad Nabi Shah M.A Economics, Principal GC, Takhti Nusrati | 11.10.1957 Karak | 18.10.1982 | 28.06.1984 | 21-2-2007 | 19 | Promotion |
| 70 | Mr. Mehar Zaman M.A Pak Study, GC Gandaf (Swabi) | 07.09.1957 Mardan | 22.10.1986 | 23.01.1988 | 21-2-2007 | 19 | Promotion |
| 71 | Mr. Mehmood Khar. M.Sc Stats. GPGC, Bannu | 01.01.1958 Bannu | 17.11.1983 | 05.01.1987 | 21-2-2007 | 19 | Promotion |
| 72 | Muhammad Abdul Hayee M.A Urdu. G.C Peshawar. | 14.04.1961 D.I.Khan | 27.09.1987 | 27.09.1987 | 21-2-2007 | 19 | Promotion |
| 73 | Muhammad Nazif M.Sc Chemistry, GPGC Charsadda | 15.01.1959 Charsadda | 17.06.1985 | 17.06.1985 | 21-2-2007 | 19 | Promotion |
| 74 | Mr. Abad Khan M.Sc Chemistry, G.C. Peshawar | 25.03.1957 Swabi | 06.01.1983 | 13.06.1985 | 21-2-2007 | 19 | Promotion |
| 75 | Muhammad Javed M.Sc Chemistry, GPGC NSR | 25.05.1958 Nowshera | 06.03.1991 | 06.03.1991 | 21-2-2007 | 19 | Promotion |
| 76 | Mr. Sher Zada M.Sc Chemistry, G.C. Lachi Kohat | 16.01.1954 Dir | 27.05.1995 | 27.05.1995 | 21-2-2007 | 19 | Promotion |
| | Dr. Muhammad Salim M.A Urdu. GDC, Datalia (Buner) | 02.10.1956 Swabi | 27.11.1983 | 21.1.1987 | 10.5-2008 | 19 | Promotion |

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| | | | | | | | |
|----|--|--------------------------|------------|------------|-----------|----|-----------|
| 78 | Mr. Gul Tiaz M.Sc Physics, G.C. Tajar, Lakki Marwat | 03.10.1956 Lakki | 01.02.1984 | 01.02.1984 | 10.5.2008 | 19 | Promotion |
| 79 | Mr. Mubarak Khan M.Sc Physics, GPGJC, Swat | 01.06.1953 Swat | 29.01.1978 | 24.01.1981 | 10.5.2008 | 19 | Promotion |
| 80 | Mr. Abdul Raees Khan M.Sc Zoology, GDC, Tazkht Nasrati | 05.06.1956 Karak | 01.10.1981 | 21.05.1983 | 10.5.2008 | 19 | Promotion |
| 81 | Mr. Karimullah M.A Pol.Sc, GDC, Chitral | 01.01.1963 Chitral | 24.09.1986 | 01.10.1989 | 10.5.2008 | 19 | Promotion |
| 82 | Mr. Akhtar Ali M.A Pol. Sc, GPGC, Fiazipur | 10.07.1956 Lakki | 13.10.1981 | 24.01.1984 | 10.5.2008 | 19 | Promotion |
| 83 | Mr. Abdul Wahab M.Sc Zoology, On deputation Islamabad | 20.05.1960 Swat | 12.11.1987 | 23.01.1988 | 10.5.2008 | 19 | Promotion |
| 84 | Mr. Zoq Akhtar M.Sc Physics, Controller Hazara University | 11.06.1956 Abbottabad | 08.11.1983 | 01.01.1987 | 10.5.2008 | 19 | Promotion |
| 85 | Mr. Safiullah Khan M.A Economics, GPGC, Bannu | 01.10.1958 Bannu | 28.10.1978 | 28.06.1984 | 10.5.2008 | 19 | Promotion |
| 86 | Mr. Ashfaq Ali Khan M.Sc Biology, GPGC, Bannu | 15.08.1957 Bannu | 23.10.1986 | 23.01.1988 | 10.5.2008 | 19 | Promotion |
| 87 | Mr. Zafrullah Khan M.A English, GPGC, Mardan. | 01.11.1960 F.R. Bannu | 13.11.1985 | 01.02.1987 | 10.5.2008 | 19 | Promotion |
| 88 | Mr. Mir Zaman M.A Economics, Principal G.C, No2 Mardan | 03.09.1957 Dir | 02.03.1983 | 25.06.1984 | 10.5.2008 | 19 | Promotion |
| 89 | Mr. Niaz Muhammad M.A Pak. Std. G.C Takhtibhai | 12.10.1958 Peshawar | 07.07.1979 | 23.10.1986 | 10.5.2008 | 19 | Promotion |


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HASSAN ULLAH AFFRIDI
High Court Peshawar

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| | | | | | | | |
|-----|---|-------------------------|------------|------------|-----------|----|-----------|
| 90 | Mr. Mujeeb-ur Rehman M.A English, GPGC, Karak | 02.01.1960 Karak | 10.01.1987 | 10.01.1987 | 10.5.2008 | 19 | Promotion |
| 91 | Mr. Zahad Tariq M.A English, Project Manager Unit DHE | 03.01.1960 Haripur | 23.10.1986 | 01.09.1987 | 10.5.2008 | 19 | Promotion |
| 92 | Mr. Ghulam Farooq M.A English, GPGC, Charsadda | 01.01.1958 Charsadda | 04.10.1984 | 04.10.1984 | 10.5.2008 | 19 | Promotion |
| 93 | Muhammad Arshad M.A Pak.Std. GC, No. 2 Bannu | 01.01.1958 Bannu | 23.10.1986 | 23.01.1988 | 10.5.2008 | 19 | Promotion |
| 94 | Muhammad Nawaz M.Sc Stats, GDC, Darazinda (FR D.I.Khan) | 02.02.1959 Haripur | 12.11.1987 | 12.11.1987 | 10.5.2008 | 19 | Promotion |
| 95 | Mr. Mashal Khan M.A English, Principal GDC, Sari Naurang | 01.04.1954 Bannu | 13.12.1981 | 24.05.1983 | 10.5.2008 | 19 | Promotion |
| 96 | Mr. Miraj Khan M.A English, GPGC, Mardan | 02.07.1955 Mardan | 08.06.1981 | 21.05.1983 | 10.5.2008 | 19 | Promotion |
| 97 | Mr. Nazir Muhammad M.Sc Maths, GC, Peshawar | 07.01.1953 Charsadda | 01.06.1983 | 01.06.1983 | 10.5.2008 | 19 | Promotion |
| 98 | Mr. Jan Afzal M.Sc Stats, Principal GC, Tangi | 12.06.1954 Charsadda | 22.12.1979 | 31.05.1983 | 10.5.2008 | 19 | Promotion |
| 99 | Mr. Masood Khan M.Sc Chemistry, Principal GDC, Shabqadar (Charsadda) | 28.06.1955 Peshawar | 31.05.1983 | 31.05.1983 | 10.5.2008 | 19 | Promotion |
| 100 | Mr. Dil Nawab M.Sc Stats, GDC, Sabir Abad Karak | 09.04.1958 Karak | 03.03.1982 | 21.05.1983 | 10.5.2008 | 19 | Promotion |
| 101 | Mr. Taj Bahadar M.Sc Stats, GC, Peshawar | 13.03.1954 Swabi | 05.11.1980 | 01.06.1983 | 10.5.2008 | 19 | Promotion |
| 102 | Mr. Mati Ullah M.A Islamiyat, Arabic, GDC Hayatabad Peshawar | 25.04.1954 Charsadda | 01.10.1981 | 04.01.1984 | 10.5.2008 | 19 | Promotion |
| 103 | Mr. Mumtaz Khan M.A Islamiyat, Arabic, G.C, Peshawar | 12.01.1953 Peshawar | 01.10.1972 | 16.01.1984 | 10.5.2008 | 19 | Promotion |
| 104 | Mr. Gul Zor Ahmad M.Sc Botany, GDC, Batkhela (MKD) | 08.02.1954 Dir | 15.01.1984 | 15.01.1984 | 10.5.2008 | 19 | Promotion |
| | Mr. Ghulam Jan M.A Islamiyat, Arabic, G.C, Paharpur | 10.05.1957 Bannu | 14.01.1984 | 14.01.1984 | 10.5.2008 | 19 | Promotion |


 HASSAN
 High School, Peshawar

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

In Re:
Service Appeal No.905/2013

Muzafar Iqbal.....Petitioner

Versus

Govt. of KPK & othersRespondents

REJOINDER/REPLY ON BEHALF OF
THE PARAWISE COMMENTS FILED BY
THE RESPONDENTS

Respectfully Sheweth:

Preliminary Objections:

The reply of Preliminary objections of Para No.1 to 6 are incorrect, the Honourable Tribunal has the jurisdiction and the appeal filed within time but the respondents are not honest to submit clear picture of the case.

REPLY ON FACTS:

1-5 No need of reply of Para No.1 to 5

6. Para No.6 is incorrect what about the approved seniority list and the notification issued on 26.11.2011, the promotion awarded with effect from 01.07.2012, while the appellant retired on 09.08.2012, so the appellant is entitled under the said notification for promotion/upgradation in BPS-20. Further that same other retired associate professor have been promoted, which is discrimination on the part of respondent.
7. That according to the notification dated 26.11.2011, the appellant is entitled.

GRUNDS:-

- A. Para A is incorrect. the names of the appellant has been left over malafidely and the appellant is well entitled and eligible for promotion in BPS-20 in accordance with law .
- B. No need of rely.
- C. That according to the notification issued on 26.11.2011 the appellant is entitled for promotion in BPS -20
- D. No need of reply.
- E. No need of reply.

- F. Incorrect. the tentative seniority list issued on 06.08.2012 while the appellant is retired on 09.08.2012.
- G. Incorrect. The appellant is entitled for promotion before his retirement but he has been throughout.
- H. That reply has already ben given in Para G.
- I. Incorrect. The appellant has not been informed.
- J. No need of reply.

It is, therefore humbly prayed that on acceptance of this reply, the appeal of the appellant may kindly be allowed.

Appellant
Through

Dated: 27.06.2016


Hassan U.K. Afridi
Advocate, Peshawar

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA

SERVICE TRIBUNAL PESHAWAR

In Re:
Service Appeal No.905/2013

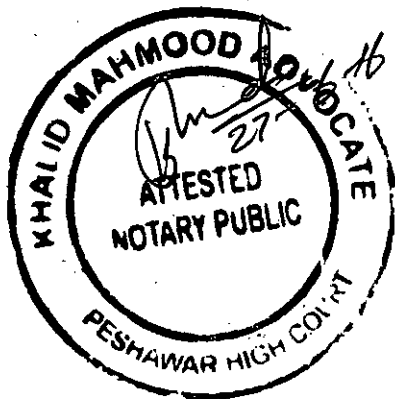
Muzafar Iqbal.....**Petitioner**

Versus

Govt. of KPK & others**Respondents**

AFFIDAVIT

I, Hassan U.K Afridi Advocate High Court, Peshawar, as per instructions of my client, do hereby solemnly affirm and declare on oath that the contents of the accompanying **rejoinder** are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Court.



DEPONENT

BEFORE THE K.P.K. SERVICE TRIBUNAL, PESHAWAR.

SERVICE APPEAL NO. _____/2013.

=====

MUZAFAR IQBAL VERSUS..... GOVERNMENT OF K.P.K.etc.

=====

APPLICATION FOR AMENDMENT / ADDING IMPORTANT
GROUNDS, RELIEF AND PRIVATE PARTIES AS RESPONDENTS.
=====

RESPECTFULLY SHEWETH:

1. That the main Service appeal has been fixed before this Honourable Tribunal for Preliminary hearing on 5/05/2014.
2. That the appellant wants to amend / add some important grounds , and making some Private persons as Respondents.
3. That the above mentioned amendment in the main appeal are very much necessary for the decision of the main appeal.
4. That the amendments are attached with this application in a separate paper.

It is, therefore, most humbly prayed that on acceptance of this application , the amendment mentioned / attached in a separate paper / Sheet may kindly be allowed.

Appellant

Through:-

(HASSAN U.K. AFIRIDI)
Advocate High Court,
Peshawar.

Dated : ___/3/2014.

A F F I D A V I T.

I, HASSAN U.K. AFRIDI, Advocate High Court,
Peshawar as per instruction of my Client appellant
do hereby solemnly affirm and declare that the
contents of the accompanying application for amendment
are true and correct to the best of my knowledge and
belief and that nothing has been concealed from this
Honourable Court.

DEPONENT.

(HASSAN U.K. AFRIDI)
Advocate, Peshawar.



BEFORE THE KHYBER PUKHTUNKHAWA SERVICE TRIBUNAL,
PESHAWAR.

SERVICE APPEAL NO. _____ / 2013.

=====

MUZAFFAR IQBAL VERSUS.... GOVERNMENT OF K.P.K.etc.

=====

APPLICATION FOR AMENDMENT / ADDING SOME
IMPORTANT GROUNDS & RELIEF IN THE MAIN
APPEAL .

=====

RESPECTFULLY SHEWETH:

The following are the some important / necessary amendments , as some important grounds, Relief.

1. That the following Associate Professors have been promoted from BPS- 19 to BPS-20, in which some are Juniors to appellants :-
 - a). Mr. Muhammad Pervaiz (M.Sc. Botany) at Serial No.15 in approved Seniority List, and at Serial No. 13 in tentative Seniority List , Retired on 01/11/2012.
 - b). Mr. Abdul Qayyum (M.Sc. Startistic) at Serial No.27 in approved Seniority list at Serial No. 22 in Tentative Seniority List , Retired on 14/10/2012.
 - c). Mr. Intiaz Ahmad (M.A. Political Science) at Serial No. 50, in approved Seniority List and at Serial No.36 in Tentaive Seniority List, Retired on 23/11/2012.

- d). Mr. Shaukat Khan (M.Sc. Botany) at Serial No. 61 in approved Seniority List and at Serial No.40 in Tentative Seniority List, Retired on 1/12/2012.
- e). Mr. Muhammad Ismail (M.Sc.Maths) at Serial No.78 in approved Seniority List and at Serial No. 52 in tentative Seniority List , Retired on 2/11/2012.
- f). Mr.Mukhtiar Ali (M.Sc. Chemistry) at Serial No. 79 in approved Seniority List and at Serial No. 53 in tentative Seniority List. Retired on 09/12/2012.
- g). Mrs.Nazia Muhammad (M.Sc. Maths) at Serial No. 129 in approved Seniority List and at Serial No. 97 in tentative Seniority list, Retired on 7/2/2013.
- h). Mr. Khurshid Khan (M.Sc. Zoology) at Serial No. 141 and in approved Seniority List at Serial No. 107 in tentative Seniority List , retired on 4/2/2013.
- i). Mumtaz Khan , at Serial No. 137 in approved Seniority list and at Serial No. 103 in tentative Seniority list , Retired on 11/01/2013.
- While the appellant is at Serial No.68 in approved Seniority List & Retired on 04/08/2012.
3. That as mentioned above Juniors have been promoted while the appellant has not been considered in tentative Seniority list may kindly be consider for promotion.

It is, therefore, humbly prayed that on acceptance of this application the above mentioned amendments may kindly be allowed.

Appellant,

Through:-

(HASSAN U.K. AFRIDI)
Advocate High Court,
Peshawar.

Dated : ___/3/2014.

=====

A F F I D A V I T.

I, HASSAN U.K. AFRIDI , Advocate High Court, Peshawar as per instruction of my Client appellant do hereby solemnly affirm and declare on Oath that the contents of this application are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Tribunal.

DEPONENT.

(HASSAN U.K. AFRIDI)
Advocate, Peshawar.