

6
Appeal No. 666/2013
Mr. Usman Ali

09.09.2013

Clerk of counsel for the appellant present and moved an application for adjournment. Case is adjourned to come up for preliminary hearing on 22.10.2013.



Member

7.
22.10.2013

Counsel for the appellant present and requested for withdrawal of the appeal alongwith connected appeals with permission to file fresh one. Request is accepted and the appeal is dismissed as withdrawn in limine with permission to file fresh one subject to all legal objections. File be consigned to the record.




Member

ANNOUNCED
22.10.2013.


3.
13.5.2013

Counsel for the appellant present and requested for adjournment. Case adjourned to 5.6.2013 for preliminary hearing.


Member.


4.
5.6.2013

Munshi to Counsel for the appellant present. In pursuance of the Khyber Pakhtunkhwa Service Tribunals (Amendment) Ordinance 2013, (Khyber Pakhtunkhwa ord. II of 2013), the case is adjourned on note Reader for proceedings as before on 15.7.2013.


Reader

5.
15.07.2013



Clerk of counsel for the appellant present and requested for adjournment. Case is adjourned. To come up for preliminary hearing on 09.09.2013.


Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 664/2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	12/04/2013	<p>The appeal of Mr. Usman Ali resubmitted today by Mr. Khan Akbar Khan 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	15-4-2013	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>13-5-2013</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Usman Ali C.T. Teacher GMS Bari Cham received today i.e. on 08/04/2013 is incomplete on the following scores which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of Impugned seniority list is not attached with the appeal which may be placed on it.
- 2- The authority to whom the departmental appeal was made/preferred has not been arrayed a party.

No. 580 /S.T,

Dt. 09/04 /2013.

[Signature]
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

MR. KHAN AKBAR KHAN ADV. PESH.

Sir, We do claim our Seniority be taken into account our untrained period should be counted to us as per service rules our objection has been put in file.
[Signature]
Advocate
Peshawar

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTOON
KHWA, PESHAWAR.

Service Appeal No 664/2013

USMANI.....Appellant

VERSUS

Govt of KPK through Secretary and others

.....Respondents

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Appellant

Through


(KHAN AKBAR KHAN)
Advocate, Peshawar.

Dated:-06-04-2013

Office: -

107-B, 2nd floor, Town Tower,
Jahangir Abad, University Road,
Peshawar.

Cell No: -

0344-9119111

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTOON

KHWA, PESHAWAR.

Service Appeal No 664/2013

K.W.P. Peshawar
691
08-4-13

Usman Ali, CT Teacher, Government Middle School, Bari Cham,
Tehsil and District Mardan.....Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa, Elementary and Secondary Education Department, Peshawar through its Secretary.
2. Secretary to Government of Khyber Pakhtunkhwa, Finance Department, Civil Secretariat, Peshawar.
3. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
4. Executive District Officer Elementary & Secondary Education Mardan.....Respondents

=====

**APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTON KHWA, SERVICE TRIBUNAL ACT, 1974 TO
THE EFFECT THAT UNTRAINED PERIOD OF THE
APPELLANT MAY KINDLY BE COUNTED TOWARDS HIS
SERVICE AND THE FRESH SENIORITY LIST MAY
PLEASE BE PREPARED ACCORDINGLY.**

=====

PRAYER IN APPEAL.

On acceptance of this appeal the untrained period of the appellant may kindly be counted towards service of the appellant and fresh seniority list may kindly be prepared accordingly.

=====

Respectfully Sheweth:-

1. That the appellant was appointed in the Education Department, as untrained C.T on fixed pay and usual allowances on dated 15.01.1995 and is still serving on the said post with full zeal and

Filed to the
6/4/13

re-submitted to
and filed.

12/4/13

- devotion. (Copy of appointment order is attached herewith as **Annexure "A"**).
2. That the appellant has passed Master Examination in the subject of Urdu and has got at his credit on the above said post a long tenure of service extending over 18 years. (Copy of the DMC of M.A urdu is attached herewith as **Annexure "B"**).
 3. That later on the appellant on dated 30.11.1999 passed the CT Course Examination from Allama Iqbal Open University and on dated 25.01.2007 also passed B.Ed examination from the said University. (Copy of the Certificate of CT Course and DMC of B.Ed are attached herewith as **Annexure "C" & "D" respectively**).
 4. That after passing the said Course of CT, the appellant was regularized and was allowed the graded/running pay scale in BPS-09 with effect from the date of passing the said CT course, i.e. 30.11.1999, vide office order dated 10.12.2001. (Copy of the office order dated 10.12.2001 is attached herewith as **Annexure "E"**).
 5. That the on dated 30.10.2009, the Finance Department vide office order No. FD (PRC) 5-2/2002 allowed all benefits of annual increment from the date of first appointment to all untrained teachers. (Copy of the office order dated 30.10.2009 is attached herewith as **Annexure "F"**).
 6. That previously a seniority list was prepared by the Education Department for District Mardan, on the basis of initial appointed in which petitioner was placed at serial No. 345. whereas in the tentative seniority list the appellant has been placed at Serial No. 586, thus untrained period of almost 5 years of the appellant has been ignored altogether.
 7. That the respondent Department is not ready to count the untrained period of almost of 5 years of the appellant towards his service in utter disregard of dictum laid down by the superior courts in this behalf.

8. That against that action of the respondent department the appellant also moved his representation to the concerned authority on dated 15.12.2012, but no response was given by them. (Copy of the representation is attached herewith as **Annexure "G"**).
9. That the appellant along-with his other colleagues having their services extending from 20 to 25 years of spotless character and they have rendered valuable services and have performed their duties with zeal and devotion. But the respondents have totally deprived them from the period spent by them as untrained teachers.
10. That this attitude of the respondent department to deprive the appellant from the untrained period of service is without any cogent/legal grounds but just to give benefit to the blue eyed teachers of the respondent department, whom have been appointed in their tenure.
11. That the appellant has got no other efficacious remedy available to him but to approach this Honourable Tribunal on the following ground inter-alia.

GROUNDS.

- A. That act of the respondent department, thereby depriving the appellant from the above said benefit of Seniority is illegal, unlawful without authority/ jurisdiction, as well as being based on malafide intentions of the respondent department is liable to be set aside.
- B. That at the time of appointment of the appellant, the respondent Department had no trained teachers, hence the appellant was appointed on fixed pay.
- C. That after appointment of the appellant as CT Teacher there was neither any time limit for completing the PTC course nor any special programme from Respondent Department.

- D. That it is pertinent to mention here that the said untrained period of the appellant is counted in the retirement period as the same is granted on the basis of date of initial appointment.
- E. That since hundred and hundreds of the teachers have been treated in a discriminatory manner and have been deprived of the above said benefit without any just cause.
- F. That the appellant has been serving on the above said post since long, whereas the minimum tenure of service amongst the appellant and his colleagues is 17 years and the maximum tenure amongst them is extended to 25 years, but they have been treated unlawfully without any cogent/solid grounds.
- G. That the said act of the respondent department is not merely illegal as well as unlawful, but is also against the very clear Article of Constitution of Islamic Republic of Pakistan as engraved in the basic rights of said constitution.

It is, therefore, prayed that on acceptance of this Service Appeal, the respondent may please be directed to count the untrained period of the appellant towards his service and they may further be directed to prepare a fresh seniority list on initial appointment basis.

Any other remedy to which appellant is found entitled, in the peculiar circumstances of the case may also be granted.

[Signature]
Appellant

Through *[Signature]*

(KHAN AKBAR KHAN)
Advocate, High Court,
Peshawar.

Dated: -06-04-2013

CERTIFICATE:

Certified that as per information furnished by my client no such like service appeal on the subject has earlier been filed in this Hon'ble Tribunal.

[Signature]
ADVOCATE

5

**BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTOON
KHWA, PESHAWAR.**

C.M No. _____ 2013

In

Service Appeal No _____/2013

Usman Ali Appellant

VERSUS

Govt of K P K through Secretary & others

..... Respondents

=====

**APPLICATION FOR TEMPORARY INJUNCTION TO THE
EFFECT THAT RESPONDENT MAY KINDLY BE
RESTRAINED FROM TAKING ANY ACTION OVER THE
TENTATIVE SENIORITY LIST, TILL THE FINAL DESICION
OF THE MAIN APPEAL.**

=====

Respectfully Sheweth:

1. That the appellant has filed the above titled service appeal before this Honourable Tribunal, in which no date of hearing has yet been fixed.
2. That respondent has prepared a seniority list in which the untrained period of almost 5 years of the appellant has not been counted towards his service.
3. That the applicant/appellant has very prima facie cause of action and is very hopeful of its ultimate success of his appeal.
4. That all the three ingredients i.e. prima facie case, balance of convenience and irreparable loss as per spirit of the rules for granting injunction is of the applicant/appellant are present in the said appeal.
5. That in case the injunction as prayed for above is denied, the applicant/appellant will suffer irreparable loss as the impugned.

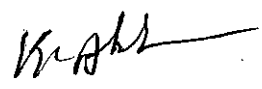
Hence, it is in the interest of justice to stay further proceedings on the impugned notification, till the final decision of this Honourable Tribunal.

- 6. That there is no legal bar in granting the injunction, as prayed for above.
- 7. That the facts and grounds taken in the memo of appeal may kindly be considered as part and parcel of the instant application.

It is, therefore, humbly prayed that in the light of above said submissions this Honourable Tribunal may please be kind enough to restrain the respondent from taking any action over the tentative Seniority list till the finalisation of the main appeal.


Applicant

Through



(KHAN AKBAR KHAN)
Advocate,
High Court, Peshawar.

Dated: 06-04-2013

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTOON
KHWA, PESHAWAR.

Service Appeal No _____/2013

Usman Ali Appellant

VERSUS

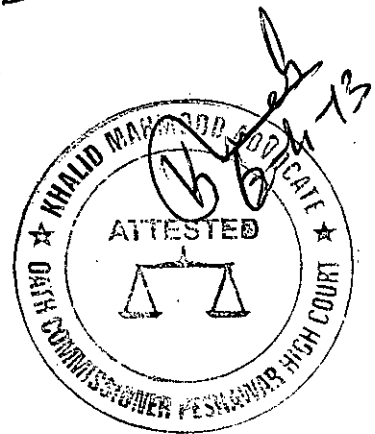
Govt of KPK through Secretary and others

..... Respondents

AFFIDAVIT

I, Khan Akbar Khan Advocate, as per instruction of my client, do hereby solemnly affirm and declare on Oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble court.

K. Akbar Khan
Deponent.



OFFICE OF THE DIVIL:DIRECTOR SECONDARY EDUCATION MARDAN DIVN:MARDAN
OFFICE ORDER:

Mr. Usman Ali BA . S/O Akhtar Bilal

village Darsi Mohallah Pdn: Distt: Mardan. is hereby appointed
as untrained C.T. at GHS Phaj Pir (SWABT) against
leave vacant post (leave vacancy) of C.T. in Gr-9 @
Rs.1605/-P.M. ~~fixed plus usual allowances~~ admissible under the
rules purely as stop gap arrangement from the date of their
taking over charge on the following terms and conditions.

TERMS AND CONDITIONS:

- 1- His appointment is purely temporary and liable to termination at any time without any assigning reason.
- 2- In case of resignation he will have to submit one month's prior notice to the department or forfeit one month's pay in thereof to the Government.
- 3- Medical certificate may be obtained from the Medical/Civil surgeon concerned.
- 4- His age should not exceed ~~25+2~~ years. 30+2. Years.
- 5- His services will be ceased automatically on the arrival of the original incumbent.

(Signature)
(MOHAMMAD ZAFAR JALIL)
DIVIL:DIRECTOR SECY: EDUCATION
MARDAN DIVN:MARDAN.

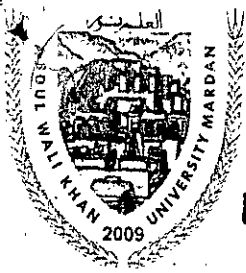
Endst:No. 111-17

Dated Mardan the 1/11/13

Copy forwarded to the:-

- 1- P/S to Education Minister (Secy:/Colleges) NWFP, Peshawar.
- 2- Distt:Education Officer (Male) Secy: Swabi.
- 3- ~~Principal/Headmaster~~ G.H.S. Phaj Pir (SWABT).
- 4- Candidate concerned.

DIVIL:DIRECTOR SECY: EDUCATION
MARDAN DIVN:MARDAN.



ABDUL WALI KHAN UNIVERSITY

MARDAN PAKISTAN

SNo:- 244

62062

DETAILED MARKS CERTIFICATE

MA URDU (FINAL) 2011

Roll No: 7808

Registration No:- 10-AWKUM-PM-628

Student's Name: USMAN ALI

Father's Name: AKHTAR BILAND

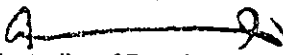
Institution / District:- Mardan

Course Name	Maximum Marks	Marks Obtained	Marks In Words	Remarks
Previous Marks	500	228	Two Hundred & Twenty-Eight	Pass
Poetry Nazam	100	42	Forty-Two	Pass
Qaseeda, Masnavi & Marsia	100	40	Forty	Pass
Iqbaliat	100	47	Forty-Seven	Pass
Criticism	100	49	Forty-Nine	Pass
Essay	100	57	Fifty-Seven	Pass
Viva Voce	100	60	Sixty	Pass

Total 1100 523

Percentage 47.55 %

Division Second


Controller of Examinations
AWKUM

Dec 29, 2011



Prepared and checked by Computer Cell AWKUM
Errors and omissions are subject to subsequent rectification.
Any misprint in Name, Father Name etc must be intimated
within 30 days of the issuance date of this certificate.

Allama Iqbal Open University, Islamabad

Serial No. 39031



Mr/Ms. USMAN ALI son / daughter of AKHTAR BELAL
 Registration No. 98-NM-V-0504 Roll No. G-6863842 has completed all the requirements of

Certificate in Teaching

in Spring/Autumn 99 semester on 30th Nov, 1999

<u>Code/Course</u>	<u>Marks obtained</u>	<u>Code/Course</u>	<u>Marks obtained</u>
631-Dimensions in Education	<u>51 /100</u> ✓	601-Teacher of Urdu	<u>48 /100</u> ✓
632-Educational Psychology	<u>59 /100</u> ✓	605-Teaching of S.Studies	<u>54 /100</u> ✓
633-School Organisation & Management	<u>49 /100</u> ✓	635-Teaching of Islamiat	<u>63 /100</u> ✓
634-English and its Teaching	<u>46 /100</u> ✓	638-Teaching of Strategies	<u>5 /100</u> ✓
612-Workshop & Teaching Practice	<u>74 /100</u> ✓		

He/She has secured 51 % marks and cumulative grade C

Prepared by: [Signature]

Checked by: [Signature]

Attested
[Signature]
 Controller of Examinations

[Signature]
 Controller of Examinations

Annexure C

(10)

Serial No.

172246

(11) *Annex-D*

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

PROVISIONAL RESULT CARD



Name: USMAN ALI
 Fathers's Name: AKHTAR BILAND
 Address: DAGI MOH BAZAR KHAWAJA GUNJ P/O
 HOTI
 Tehsil: MARDAN
 District: MARDAN

Roll No: R657896
 Registration No: 98NMM0514
 Final Semester: SPR- 2006

has successfully completed BACHELOR OF EDUCATION(B. ED) Programme.

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 05	0513	SCHOOL ORGANIZATION	100	65
SPR- 05	0514	EVALUATION, GUIDANCE & RESEARCH	100	64
SPR- 05	0519	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	63
SPR- 05	0651	ENGLISH	100	53
AUT- 05	0654	TEACHING OF ISLAMIAT	100	63
AUT- 05	0658	TEACHING OF URDU	100	51
SPR- 06	0612	PERSPECTIVES OF EDUCATION	100	64
SPR- 06	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	60
SPR- 06	0655	WORKSHOP	100	70

CREDITS 6

Total Marks / Obtained 900 / 526

Result Declared on JANUARY 25, 2007

Percentage / Grade 58

Date of issue FEBRUARY 05, 2007

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

[Signature]
Controller of Examinations

12

Annul E A

OFFICE OF THE EXECUTIVE DISTRICT EDUCATION, SWABI.

AWARD OF GRADED PAY. SCALE.

The following G.T teachers are hereby allowed ~~from the date of their examination~~ running pay scale in BPS-9(RS.1605-97-3060) with effect from the dates noted against each i.e. the date of passing their C.T examination.

<u>S.NO.</u>	<u>Name/School</u>	<u>Date from which graded pay allowed.</u>
1.	Muhammad Tahir CT GHS NO.I.Yar-Hussain.	11.5.1999
2.	Usaman Ali CT. GMS Takil(Gadson)	30.11.1999.

Note;

1. Necessary entry to this effect should be made in their Service Book.
2. An under taking should be obtained to the effect if any consequences occurred later on in this order it will be automatically considered as cancelled.

(SHAMS KHAN SHAMS)
DISTRICT OFFICER, SECY:
EDUCATION SWABI

Endst; NO 670205 / Dated 10/12 / 2001.

Copy forwarded for information and n, action to the; 2000

1. Director Secy; Education NWFP Peshawar, w/r to his letter No.9/A14CTdt1.12
2. Principal/Haedmaster Concerned.
3. District Accounts Officer Swabi.
4. A.D/O% (Asst) Local Office.

[Signature]
DISTRICT OFFICER
EDUCATION SWABI.

Blagatm

(13) ANNEXURE (F)

**GOVERNMENT OF N.W.F.I
FINANCE DEPARTMENT
(REGULATION WING)**

NO. FD (PRC) 5-2/2002
Dated Peshawar the: 30-10-2009

To: The Secretary to Govt. of NWFP,
Elementary & Secondary Education Department,
Peshawar.

Subject: GRANT OF ANNUAL INCREMENT / RUNNING PAY TO
UNTRAINED TEACHERS IN THE LIGHT OF SUPREME
COURT JUDGMENT.

Dear Sir,

I am directed to refer to this Department letter No.FD (PRC) 5-2/2002, dated 30-03-2009 on the subject noted above and to say that certain quarters have raised some queries about the subject matter which are clarified as under:-

- i. All those untrained teachers who were appointed on fix pay and were subsequently regularized against their posts, on acquiring / completing requisite training successfully, would be entitled for such benefits of annual increments from the date of their first appointments as such, but without arrears.
- ii. The above benefit would also be admissible to all those retired teachers who fulfil the above conditions.
- iii. The above benefit would not be admissible to those who themselves resigned, or were removed / terminated from service.

2. This Department letter of even number dated 30-03-2009 shall be deemed to have been modified to the above extent.

Yours Faithfully,

(SHAUKAT ULLAH)
SECTION OFFICER (SR-1)

Endst: of even No. & date.

Copy for information and necessary action:-

1. Accountant General, NWFP.
2. All District Coordination Officers, NWFP.
3. All District / Agency Accounts Officers, NWFP / FATA.

SECTION OFFICER (SR-1)

(14)



GOVERNMENT OF N.W.F.P
FINANCE DEPARTMENT
(REGULATION WING)

NO.FD (PRC) 5-2/2002
Dated Peshawar the: 30-03-2009

To: The Secretary to Govt. of NWFP,
Elementary & Secondary Education,
Peshawar.

3222
7-4-09

Subject: GRANT OF ANNUAL INCREMENT / RUNNING
PAY TO UNTRAINED TEACHERS IN THE LIGHT
OF SUPREME COURT JUDGEMENT.

Dear Sir,

I am directed to refer to your letter NO.SO (B&A). 1-16/08/
Advance Increment dated February 27, 2009 on the subject noted above and
to state that the Provincial Government is pleased to allow the benefit of
annual increments to the untrained teachers from the date of their regular
appointment.

No arrears shall however, be admissible / payable prior to the
date of issuance of this circular.

(ABDUL JABBAR)
SECTION OFFICER (SR-1)

Endst: of even No & date.

Copy for information & necessary action to the:

1. Accountant General NWFP.
2. All District Coordination Officers.
3. All District / Agency Accounts Officers NWFP / FATA.

SECTION OFFICER (SR-1)

HRDO/EA

pl sent to copy to
Edn Dept. 108
DCO HRDO FE+SE

10/04

HRDO
EA

(Signature)

بخصوص جناب ایگزیکٹو ڈسٹرکٹ آفیسر (ای اینڈ ایس) ایجوکیشن مردان

درخواست بمطابق سناری ٹی لسٹ 2012 ضلع مردان

- (۱) بحوالہ تاریخ آغاز ملازمت کو بنیاد بنایا جائے۔
- (۲) انٹرزسٹرکٹ کا دورانیہ بھی سناری ٹی لسٹ میں شامل کیا جائے۔
- (۱) مندرجہ ذیل گزارشات گوش گزار کرنے کی سعی ہے۔ امید باور ہے۔ شنوائی و کارروائی حسب استدعا عمل میں لائی جائے گی۔ یہ کہ سائل محکمہ تعلیم خیبر پختونخوا میں بحیثیت سی ٹی بمورخہ 15-01-1995 کو گورنمنٹ ہائی سکول پنج پیر ضلع صوابی میں تعینات ہوا تھا۔ اور تادم تحریر اپنی ذمہ داری بطریق احسن انجام دے رہا ہوں۔
- (۲) یہ کہ گزشتہ سناری ٹی لسٹ ضلع مردان کو تاریخ آغاز ملازمت کو بنیاد بنا کر تیار کیا گیا تھا۔ جس میں سائل کا نمبر 345 تھا۔
- (۳) یہ کہ موجودہ ضلعی سناری ٹی لسٹ 2012ء میں ان ٹرینڈ پیریڈ کو شمار نہیں کیا گیا۔ جس میں سائل کا سناری ٹی نمبر 586 ہے۔ حالانکہ حکومت نے ان ٹرینڈ پیریڈ کو ملازمت میں شمار کر کے بقایا جات بھی دیئے ہیں۔
- (۴) یہ کہ سناری ٹی لسٹ 2012ء میں تاریخ آغاز ملازمت کو خاطر میں نہ لاتے ہوئے مرتب کرنا سراسر خلاف ضابطہ و قانون اور انصاف کے تقاضوں سے متصادم ہے۔
- (۵) یہ کہ حکومت کا انٹرزسٹرکٹ کا دورانیہ بھی سناری ٹی لسٹ میں شامل نہ کرنا زیادتی اور انصاف کے منافی ہے۔ حالانکہ اس دورانیہ کو دوران ٹرینڈ دورانیہ کو حکومت سائل کی ملازمت اور ریٹائرمنٹ میں شمار کرتی ہے۔ پس یہ سائل کی حق تلفی ہے۔

لہذا آپ صاحبان سے گزارش ہے۔ کہ مذکورہ ضلعی لسٹ 2012ء کو کالعدم قرار دیتے ہوئے تاریخ آغاز ملازمت کو بنیاد بنا کر مرتب کیا جائے اور انٹرزسٹرکٹ کا دورانیہ بھی اس میں شامل کیا جائے۔

مورخہ: 15/12/12

العاض

نام عثمان علی
پوسٹ سی ڈی
سکول گورنمنٹ مڈل سکول باڈی چم مردان

Forwarded to E.d.o (E.S) education
Mardan for necessary action please.

بشرف ملاحظہ:

- (۱) سیکرٹری ایجوکیشن خیبر پختونخوا
- (۲) ڈائریکٹر ایجوکیشن خیبر پختونخوا ایشادور
- (۳) ڈی سی او ضلع مردان

