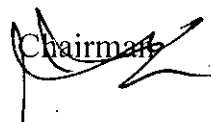


29.11.2017

Counsel and Addl. AG for the respondents present.

The learned AAG objected to the very jurisdiction of this Tribunal. The learned counsel for the appellant seeks adjournment. Granted. To come up for arguments on 14.12.2017v before the D.B.


  
Member

  
Chairman

14.12.2017

Counsel for the appellant and Mr. Kabeerullah Khattak, Addl. AG alongwith Hameedur Rahman, A.D for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, in connected service appeal NO. 2813/2010, entitled "Raham Akbar Versus Government of Khyber Pakhtunkhwa through Secretary Schools & Literacy, Peshawar and others", this appeal is also returned to the appellant for seeking redressal before the proper forum with all just legal and factual exceptions. Parties are left to bear their own costs. File be consigned to the record room.

  
MEMBER

  
CHAIRMAN

ANNOUNCED  
14.12.2017

9/10/2017

Counsel for the appellant and Mr. Kabirullah Khattak, AAG alongwith Mr. Hameed-ur-Rehman, AD for the respondents present. Learned AAG seeks adjournment. Adjourned. To come up for record as per order sheet dated 4/8/2017 and arguments on 30/10/2017 before DB.

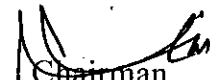
  
Member

  
Chairman

30.10.2017

Counsel for the appellant and Mr. Kabeerullah Khattak, Addl. AG alongwith Hameedur Rahman, AD for the respondents present. Representative of the respondents produced a list for perusal of the appellant. Both the parties seek adjournment. To come up for further proceedings/arguments after consulting the list before the D.B on 16.11.2017.

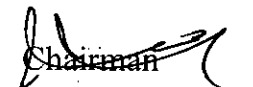
  
Member

  
Chairman

16.11.2017

Counsel for the appellant and Addl. AG alongwith Sajjed Ahmad, ASDEO for the respondents present. Learned Addl. AG seeks adjournment. Granted. To come up for arguments on 29.11.2017 before the D.B.

  
Member

  
Chairman

17.04.2017

Counsel for the appellant present. Mr. Hameed-ur-Rehman, AD (Litigation) alongwith Mr. Muhammad Adeel Butt, Additional AG for the respondents also present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 04.08.2017 before D.B.

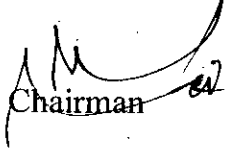
  
(Ahmad Hassan)  
Member

  
(Muhammad Amin Khan Kundi)  
Member

04.08.2017

Counsel for the appellant and Addl. AG for the respondents present. The learned counsel for the appellant brought to the notice of this Tribunal the order sheet dated 03.08.2016 whereby this Tribunal has directed the department to provide approved sanctioned strength of SETs as on 14.2.2007, Seniority list of SETs and list of 243 notified SETs who had been given selection grade. The learned counsel for the appellant further submitted that their cases would be disposed of if the seniority list of 243 persons is provided by the department by omitting the duplication, died and those who were already promoted and were not entitled for selection grade. To come up for submission record on 30.08.2017 before the D.B.

  
Member

  
Chairman

30.08.2017

Counsel for the appellant and Addl. AG alongwith Mr. Hameedur Rahman, AD for the respondents present. Counsel for the appellant seeks adjournment. Granted. To come up for arguments on 09.10.2017 before the D.B.

  
Member

  
Chairman

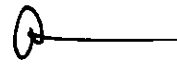
05.04.2016

Clerk to counsel for the appellant and Mr. Ziaullah, GP for respondents present. Clerk to counsel for the appellant requested for adjournment. To come up for arguments on 03.08.2016.

  
Member

03.08.2016

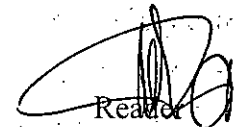
Counsel for the appellant and Addl: AG for respondents present. Counsel for the appellant requested for adjournment. To come up for arguments on 12.12.2016.

  
Member

  
Member

12.12.2016

Since 12<sup>th</sup> December, 2016 has been declared as a public holiday an account of 12<sup>th</sup> Rabi-ul-awal. Case is adjourned to 17.04.2017 before D.B.

  
Reader

62/12

05.1.2015

Clerk to counsel for the appellant and Mr. Muhammad Adeel Butt, AAG with Mosam Khan, AD for the respondents present. The Tribunal is incomplete. To come up for the same on 20.4.2015.




READER

20.04.2015

Counsel for the appellant and Addl: A.G for respondents present. Counsel for the appellant stated that similar nature cases are also pending before this bench on 22.5.2015. To come up for the same on 22.5.2015 alongwith the same appeals.



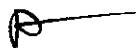
Member



Member

22.05.2015

Appellant in person and Addl: A.G for respondents present. Due to general strike of the bar counsel for the appellant is not available. To come up for arguments on 13.11.2015.



Member



Member

13.11.2015

Counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Arguments could not be due to shortage of time. To come up for arguments on 5-4-2016.



Member



Member

30.09.2013.

Clerk to counsel for the appellant and Mr. Muhammad Jan, GP present. Written reply of respondents No. 1 and 2 already received. Notices be issued to the respondents No. 3 and 4. To come up for their written reply on 18.12.2013.

  
MEMBER

18.12.2013.

Counsel for the appellant, Mr. Muhammad Adael Butt, AAG with Muhammad Irshad, SO for respondent No. 3 present and reply filed. Copy handed over to counsel for the appellant. Mr. Khursheed Khan, SO and Mosam Khan, AD for respondents No. 1 & 2 present who already filed written reply. Counsel for the appellant already submitted an application for deletion of respondent No. 4 from the list of respondents due to change set up. As such respondent No. 4 is deleted from the list of respondents. To come up for rejoinder on 6.3.2014.

  
MEMBER

  
MEMBER

6.3.2014

Clerk to counsel for the appellant and AAG Khursheed Khan, SO and Mosam Khan, AD for the respondents No. 1 & 2 present. Counsel for the appellant needs time. To come up for arguments on 11.8.2014. Rejoinder, if any, in the meantime.

  
MEMBER

  
MEMBER

11.08.2014

Clerk to counsel for the appellant and AAG with Khursheed Khan, SO and Mosam Khan, AD for the respondents present. Learned Executive Member is on ex-Pakistan leave, therefore, case to come up for arguments on 05.01.2015.

  
MEMBER

19.02.2013.

No one is present on behalf of the appellant Mr. Mosam Khan, AD for respondents No.1 and 2 with AAG present. None is available for respondents No.3 and 4. Written reply on behalf of respondents No. 1 and 2 received, copy whereof be handed over to the appellant. The appellant may produce correct address of respondent No.4. To come up for written reply of the remaining respondents on 18.04.2013.

MEMBER

MEMBER

18.04.2013

No one is present on behalf of the appellant Mosam Khan, AD for respondent No.1, Khurshid Khan, SO for respondent No.2 and Muhammad Aqeel, Assistant for respondent No.3 with Arshad Alam, GP present. Written reply on behalf of respondent No.3 and 4 has not been received. Representative of respondent No.3 requested for time. Notice be issued to the learned counsel for the appellant to produce correct address of respondent No.4. To come up for further proceedings on 26.06.2013.

MEMBER

MEMBER

26.6.2013

Counsel for the appellant and Mr. Muhammad Jan, GP with Khurshid Khan, SO for the respondents present. In pursuance of promulgation of Khyber Pakhtunkhwa Service Tribunal (Amendment) Ordinance 2013, the Tribunal is incomplete. To come up for the same on 30.9.2013.

READER

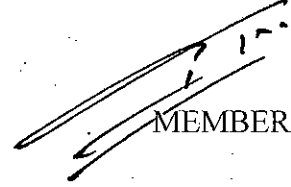
*Handwritten notes:*  
7/5/13  
7/5/13

Appeal No. 62/2012.

25.06.2012

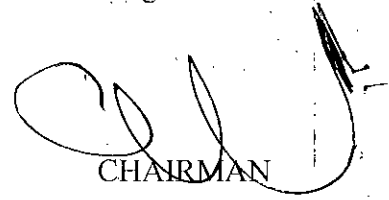
Appellant with counsel present and stated that similar nature appeals by the other aggrieved Head Masters have been admitted for regular hearing on 27.01.2011, on the grounds that though the appellant was eligible for grant of selection grade in BPS-17 w.e.f 30.06.2001 after certain number of S.E.Ts senior to him either retired/died or were regularly promoted through the Public Service Commission; but he was not granted selection grade vide notification dated 26.12.2008; hence he preferred departmental appeal and when received no response from the departmental respondents within the statutory period prescribed for the purpose, he filed the instant appeal. The points raised at the Bar need consideration. The appeal is admitted to regular hearing, but subject to all just exceptions. Process fee and security be deposited within 10 days. Thereafter, notices be issued to the respondents for written reply/comments on 08.10.2012.

Appellant deposited  
Process fee & Security  
of Rs. 200/- Bank Receipt  
attached with file.

  
MEMBER

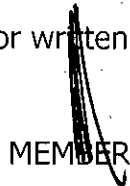
25.6.2012

This case be put up before final Bench II alongwith connected appeals on the date fixed i.e 08.10.2012.

  
CHAIRMAN

8.10.2012

Counsel for the appellant, and Mr. Sherafgan Khattak, AAG with Muhammad Irshad, S.O (Litigation) and Khursheed Ali, S.O for the respondents present and needs further time. To come up for written reply on 19.12.2012.

  
MEMBER

  
MEMBER

19.12.2012.

None for the appellant and Mr. Sherafgan Khattak, AAG with Abbas Ali, S.O, Mosam Khan, AD and Muhammad Aqeel, Assistant for respondents No. 1 to 3 present and requested for further time. None is available on behalf of respondent No. 4. Fresh notice be issued to him. To come up for written reply on 19.2.2013.

  
MEMBER

  
MEMBER



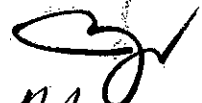
14.5.2012

Fayaz Ahmad clerk of Counsel for the appellant,  
Mr. Zubair Muhammad A.G.P alongwith Muhammad  
Aqeel Assistant for the respondents present. The  
latter requested for adjournment. Case adjourned to  
13.6.2012 for reply/ preliminary hearing.

  
Member.

13-6-2012.

Mr. Fayaz Ahmad Clerk  
of Counsel for the appellant  
present. No one is present  
for respondents. Notices be  
issued to them for reply/p.  
on 25-6-2012.

  
Member.

FORM "A"

FORM OF ORDER SHEET

Court of.....

Case No. 62 of 2012

Serial No. of Order or Proceedings 1	Date of Order or Proceedings 2	Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel where necessary 3
1-	16/01/2012	<p>The appeal of Mr. Gulab Khan presented to-day by Mr. Ghulam Nabi Adv; may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR</p>
2-	<u>24-1-2012</u>	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>22-2-2012</u>.</p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p>
3.	22.2.2012	<p>Clerk of counsel for the appellant present and moved application for adjournment on behalf of counsel for the appellant due to his pre-occupation in the High Court. To come up for preliminary hearing on 6.4.2012.</p> <p style="text-align: right;"><i>[Signature]</i> MEMBER</p> <p><u>6-4-2012</u> Counsel for appellant present. Arguments heard. Pre-admission notice being issued to the res-</p>

Criminal

Serial No. of Order or Proceedings 1	Date of Order or Proceedings 2	Order or other Proceedings with Signature of Judge or Magistrate that of parties or counsel where necessary 3
		<p>pondents for reply / JH on 14-5-2012.</p> <p><i>[Signature]</i> Member</p>

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTOONKHA,  
PESHAWAR.

Service Appeal No. 62 / 2012

Gulab Khan .....Appellant

Versus

Government of Khyber Pakhtoonkhwa

and others .....Respondents.

I N D E X

S.No.	Description of documents	Annexures	Pages
1.	Service appeal		1 - 4
2.	Affidavit		0 - 5
3.	Copy of Notification	'A'	0 - 6
4.	Copy of seniority list	'B'	7 - 9
5.	Copy of the minutes of the meeting.	'C'	10 - 21
6.	Copies of the annexures regarding the above noted teachers	'D to D/3'	22 - 30
7.	<i>copy of the dept appeal</i>		
8.	Vakalat Nama	E	0 - 31

Appellant

through  
*Ghulam Nabi*  
( Ghulam Nabi )  
Advocate, Peshawar.

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTOONKHWA, PESHAWAR.

Service Appeal No. 62 / 2012

Gulab Khan, Ex-S.E.T. Head Master,  
Government High School, Khan Khel, Mandozai  
District Lakki Marwat .....Appellant

Versus

1. Government of Khyber Pakhtoonkhwa  
Secretary Schools & Literacy Peshawar.
2. Director, Schools & Literacy,  
Khyber Pakhtoonkhwa, Peshawar.
3. Secretary to Government of Khyber  
Pakhtoonkhwa Finance Department,  
Peshawar.
4. Secretary to Government of Khyber  
Pakhtoonkhwa, Services Department,  
Peshawar.

.....Respondents.

APPEAL W/S 4 OF THE SERVICE TRIBUNAL ACT, 1974  
FOR THE GRANT OF SELECTION GRADE BPS-17 TO THE  
APPELLANT.

*16/1/2012*  
PRAYER: On acceptance of this appeal, the respondents  
may please be directed to grant/allow the  
appellant the selection grade BPS-17 w.e.f.  
30-06-2001.

Respectfully sheweth:

1. That the appellant is serving as Headmaster at GHS Khan Khel  
Mandozai District Lakki Marwat.
2. That the Education Department has issued the Notification  
dated 26-12-2008, thereby selection grade (BPS-17) has been  
granted to the SET teacher upto seniority No. 2223 (Copy of  
the Notification is attached as Annexure 'A').

*Deleted  
18-12-2013*

*16/01/12*

3. That the appellant has got at his credit his seniority No. 2337 (Copy of seniority list is attached as Annexure 'B').
4. That on 14-02-2007 a meeting was held under the supervision of Secretary Elementary & Secondary Education, whereby it was held that till 30-06-2001 the recommended numbers of SETs (Male) was 7532 amongst which 243 teachers were eligible for the selection grade on the basis of 33%. (Copy of the minutes of the meeting is attached as Annexure 'C').
5. That the factual position in the above said case is that 05 SET teachers have been double listed, 05 SET teachers have already died, 91 SET teachers have been retired before 30-11-2001 and similarly 18 SET teachers have been regularly promoted through the Public Service Commission, thereby bringing the number of total eligible teachers for the selection becomes 177. (Copies of the Annexures regarding the above noted teachers are attached herewith as Annexures 'D' to 'D/3').
6. That because of the above said position the appellant will alongwith his other colleagues are being deprived of their legal and lawful right of the selection grade for mere clerical mistakes or for not providing the correct and upto date information into the service record.
7. That the appellant has in this connection filed an appeal before the appellate authority for the grant of a selection grade as according to the above noted position there are more 177 vacancies for the selection grade available for the senior SET teachers. (Copy of the departmental appeal is attached as Annexure 'E').
8. That the appellant now approaches this Hon'ble Tribunal for the grant of above said relief on the following grounds amongst others :-

G R O U N D S


- a) That the act of the respondents, thereby depriving the appellant from his legal and lawful right of selection grade on mere grounds that the record of 177 teachers has not correctly been made and has not been made upto date is an act illegal, unlawful, without authority/jurisdiction and being based on the malafide intentions of the respondent Department is liable to be set aside.
- b) That the appellant has been waiting since so many years for his turn to come for the selection grade but on a mere presumption his right of selection grade has been snatched by the respondents Department on the grounds that record regarding the retired, dead and promoted teachers has not been correctly made upto date and on his clerical mistake the right of the selection grade of the appellant is being snatched by the respondents Department.
- c) That it is mere a lame excuse that the record regarding the 177 teachers as mentioned above is not correct, hence till the correction of this record the appellant will be kept deprived of his right of getting selection grade.
- d) That it is the primary duty of the respondents Department to maintain the upto date record as according to the exact factual position of the teachers, thereby deleting the names of the teachers on double list, dead, retired or already promoted to a higher grade and the failure of the respondents not to maintain the above said record fresh and upto date cannot be a good excuse for depriving the appellant of his legal right of selection grade.
- e) That the appellant is being condemned unheard and being punished without any fault at his part which is an act of unjust and against all the norms of justice.

f) That it is now the proper time that the appellant should be given his right of selection grade without further delay for spending more time on correction and for the up dating the record.

It is, therefore, respectfully prayed that on acceptance of this appeal, this Hon'ble Tribunal may please be kind enough to direct the respondents Department to process the case of the appellant for the selection grade and to grant the said selection grade to the appellant, if he is otherwise eligible for the said benefit after making the proper corrections in the above said record.

  
Appellant

through

  
( Ghulam Nabi )  
Advocate, Peshawar



BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTOONKHA, PESHAWAR.

Service Appeal No. \_\_\_\_\_ / 2012

Gulab Khan .....Appellant

Versus

Government of Khyber Pakhtoonkhwa  
and others ..... Respondents.

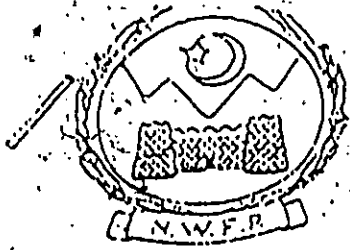
A F F I D A V I T

I, Ghulam Nabi, Advocate, Peshawar as per instructions of my client do hereby solemnly affirm and declare that the contents of the accompanying service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

ATTESTED  
HALID MAHMOOD ADVOCATE  
OATH COMMISSIONER  
PESHAWAR HIGH COURT

Deponent  
*Ghulam Nabi*  
( Ghulam Nabi )  
Advocate, Peshawar

*Ghulam Nabi*  
16-1-12



(1) A

**GOVERNMENT OF NORTH-WEST FRONTIER PROVINCE  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

**NOTIFICATION**

Peshawar, Dated: 26-12-2008

No. SO(PE)2-6/E&SE/DPC/Librarian(BS-16 to BS-17)/08: Consequent upon the recommendations of the Departmental Promotion Committee, the competent authority is pleased to grant Selection Grade BS-17 to the following sixteen SETs (BS-16) according to their seniority with effect from 30-6-2008:-

S#	NAME & DESIGNATION OF OFFICERS	PLACE OF POSTING
1	Mr. Azizullah Khan SET.	Govt Middle School Spin Kamar (SWA)
2	Mr. Khairullah Khan SET.	GCMHS Peshawar Cantt.
3	Mr. Farid Nawaz SET.	ADO (Male) Primary Bannu.
4	Mr. Hanifullah SET.	GCMHS Peshawar City.
5	Mr. Muhammad Shuaib SET.	GHS Biliang Kohat.
6	Mr. Haider Ali Khan SET.	GHS Tattar Khel, Karak.
7	Mr. Fazal Muhammad SET.	GHS Sawal Dher Mardan.
8	Mr. Iqbal Hussain SET.	GHS Jehangira Swabi.
9	Mr. Abdul Aziz SET.	Govt Middle School Bhai Khan Mardan.
10	Mr. Saidan Shah SET.	GHS Jared Mansehra.
11	Mr. Muhammad Ibrahim SET.	GHS Julagram Malakand Agency.
12	Mr. Abdus Sattar SET.	GCMHS Abbottabad.
13	Mr. Muhammad Zarin SET.	GHS Kot Najeebullah Haripur.
14	Mr. Muhammad Dawood SET.	GMS, Badlar-bridge No.2 (SWA)
15	Mr. Abdur Rahim Jan SET.	GHS Zaida Swabi.
16	Mr. Zahoor Muhammad SET.	GHS Toru Mardan.

Sd/-

SECRETARY TO GOVT OF NORTH-WEST FRONTIER PROVINCE  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Encls: of even No. & Date:-

Copy is forwarded to:-

1. Secretary to Govt of NWFP, Establishment Department, Peshawar.
2. Special Secretary (Regulation), Establishment Department, Govt of NWFP Peshawar.
3. Secretary to Govt of NWFP, Finance Department, Peshawar.
4. Secretary to Chief Minister NWFP.

5. PS to Chief Secretary NWFP.
6. All Directors in Elementary & Secondary Education Department NWFP.
7. All District Coordination Officers in NWFP.
8. All Executive District Officers Elementary & Secondary Education in NWFP.
9. All Executive District Officers (Finance & Planning) in NWFP.
10. The Accountant General NWFP.
11. All District /Agency Accounts Officers in NWFP.
12. Director Information NWFP Peshawar with the request to give vast publicity through media.
13. Secretary, NWFP. Public Service Commission Peshawar.
14. All Section Officers/Planning Officers / Statistical Officers, E&S Edu: Dept: Govt of NWFP.
15. Deputy Database Administrator (EMIS) Elementary & Secondary Education Department.
16. PS to Minister for Education (Elementary & Secondary) NWFP.
17. PS to Secretary / Special Secretary/ Additional Secretary E&S Edu: Dept Govt of NWFP.
18. PA to Deputy Secretary (Admn) Elementary & Secondary Edu: Department Govt of NWFP.
19. PA to Chief Planning Officer Elementary & Secondary Education Department Govt of NWFP.
20. Officers concerned.
21. Master file.

(MUIHAMMAD AYUB KHAN)  
SECTION OFFICER (PRIMARY)

(13)

تنظیم اساتذہ ہونے پر  
(مشعبہ لیبرو اساتذہ)

DIRECTORATE OF SECONDARY  
EDUCATION NWFP PESHAWAR.

NO. 3199-3233/A-88/B.List.

Dated Peshr the 29.8 /2001.

To

1. The Director of Education  
(FATA)NWFP, Peshawar.
2. The Director of Education  
Primary NWFP, Peshawar.
3. The Director Bureau of Curriculum  
Development and Education Extension  
NWFP, Abbottabad.
4. All the Executive District Officers  
Litracy and Education in NWFP.

(7)

B

Subject;-

FINAL SENIORITY LIST OF SETS EDUCATION  
DEPARTMENT (MALE SECTION) UPTO

Memo;

A copy of the Final Seniority list of SETs(M) is enclosed herewith for information of all concerned who are working under your jurisdiction. The said Senicrity list should be brought into the notice of all SETs and their signatures (for having seen and checked the list thoroughly) should be obtained from them and kept in your office for record.

Deputy Director Secondary  
Education NWFP, Peshawar.

Endst: No. 3234-3334

Copy forwarded to the:-

1. Officials concerned.
2. PA to Director Secy: Edu: NWFP, Peshawar.

29/8/01  
Deputy Director Secondary  
Education NWFP, Peshawar.

Abdul jabbar.

3048201.

2194	Mr. Muhammad Zahir Khan MA BEd	Gadezai Swat	1986	3-8-48/Swat	7-9-64	1-11-86	223
2195	Mr. Rustam Shah MA BEd	GHSS Mardan	1980	2-12-42 Mardan R	25-1-67	1-11-86	223
2196	Mr. Malik Aman MA BEd	GMS Sikandari Swbi	1980	8-8-47/Swabi	25-5-69	1-11-86	223
2197	Mr. Rahmat Shah MA BEd	GHS No.2 Pesh: Cantt	1980	11-7-52/Pesh:	7-9-71	1-11-86	223
2198	Mr. Abdul Karim MA BEd	GHS Khesghi Bala Nowshera	1979	8-2-50/Charsadda	2-10-71	1-11-86	223
2199	Mr. Abdul Malik MA MED	GHS Yar Hussain Swabi	1984	8-4-54/Swabi	24-1-74	1-11-86	224
2200	Mr. Ibrahim Khan MA BEd	GMS Garhi Daulatzai Mardan	1980	3-11-56/Mardan	15-10-80	1-11-86	224
2201	Mr. Muhammad Ayub MA BEd	GHS Kani Gurram SWA	1981	3-2-58/Bannu	24-1-81	1-11-86	224
2202	Mr. Akhtar Zaman BSc BEd	GMS Mama Khel Banochi	1986	15-1-61/Bannu	29-10-85	1-11-86	224
2203	Mr. Rehman Ali MA BEd	GHS Jalbai Mardan	1980	1-11-56/Mardan	1-11-86	1-11-86	224
2204	Mr. Hidayat Ali Shah MSc BEd	GHS	1984	24-2-69/Pesh:	1-11-85	1-11-86	224
2205	Mr. Khairullah Khan BSc MED	GHS Doaba Kohat ✓ 6	1985	3-9-60/Karak	1-11-86	1-11-86	224
2206	Mr. Farid Nawaz MA BEd	GHSS Sarai Naurang Bannu	1981	10-2-54/Bannu	22-11-75	2-11-85	224
2207	Mr. Hanifullah MA BEd	GMS Zaryab Colony Pesh:	1984	1-1-48/Pesh:	19-11-78	4-11-86	224
2208	Mr. Muhammad Shoaib MA BEd	GHS Ejlitang Kohat 6	1986	16-2-60/Kohat	9-12-85	4-11-86	224
2209	Mr. Fazal Muhammad BA BEd	GHS Tatma Mardan	1986	13-4-61/Mardan	15-10-81	5-11-86	225
2210	Mr. Iqbal Hussain MA BEd	GHS Jabba Nowshera	1980	1-3-57/Mardan	23-9-80	6-11-86	225
2211	Mr. Muhammad Javed MSc BEd	GHS Baja Swabi	1984	21-3-61/Mardan	6-11-85	6-11-86	225
2212	Mr. Muhammad Amin MA BEd	GHS Yar Hussain Swabi	1980	1-1-48/Swabi	5-4-66	8-11-85	225
2213	Mr. Abdur Rashid	GHS Mitha - K K	1977	13-11-48/ K A	1-9-70	15-12-86	225
2214	Mr. Saadullah Khan BA MED	GHS Dhakki DiK	1983	24-5-49/DIK	7-9-71	8-11-86	225
2215	Mr. Abdul Aziz MA BEd	GHS Gurat Mardan	1980	2-1-53/Mardan	18-4-72	8-11-86	225
2216	Mr. Abdul Wadood BA BEd	GHS Kotli Bala Mansehra	1981	1-4-43/Mansehra R	22-4-65	11-11-86	225
2217	Mr. Saidan Shah MED	GHSS Mansehra	1986	10-6-51/Mansehra	7-9-71	11-11-86	225
2218	Mr. Muhammad Ibrahim MA BEd	GHS Kharki Dheri MKD	1983	2-2-51/MKD	9-12-72	11-11-86	225
2219	Mr. Abdul Sattar MA BEd	GHS Hamoo A. Abad	1983	1-1-55/A. Abad	1-11-86	11-11-86	226
2220	Mr. Muhammad Zarin MA MED	GHS Bai A. Abad	1985	12-4-59/A. Abad	1-2-78	11-11-86	226
2221	Mr. Muhammad Dand BA BEd	GMS Badar Baridge No.2 SWA	1986	1-1-58/SWA	23-10-86	11-11-86	226
2222	Mr. Abdur Rahim Jan MA BEd	GMS Dodher Swabi	1980	12-12-44/Swabi	1-10-64	12-11-86	226
2223	Mr. Zahoor Ahmad MA BEd	GHS Toru Maira Mardan	1979	27-3-44/Mardan R	5-4-66	12-11-86	226
2224	Mr. Mushtaqur Rehman MA BEd	GHS Dadwan Dir	1984	18-2-54/Dir	4-5-78	12-11-86	226
2225	Mr. Muhammad Khrushid MA MED	Oghi Mansehra	1986	23-5-55/Mansehra	5-2-78	12-11-86	226
2226	Mr. Shah Jehan MA BEd	GHS Qandil Swat	1984	22-8-45/Swat	30-4-86	12-11-86	226
2227	Mr. Aurangzeb BA BEd	GHS Darra Paizu Bannu	1985	8-11-51/Bannu	12-11-86	12-11-86	226
2228	Mr. Muhammad Sadiq MA MED	GHS Dalola A. Abad	1981	1-4-43/A. Abd R	23-9-61	13-11-86	226
2229	Mr. Sultanul Arifin BA BEd	GHSS T. Town. Ship A. Abad	1982	2-6-44/A. Abad	8-5-66	13-11-86	227
2230	Mr. Saeedullah MA BEd	GMS Katan Bala Dir	1984	3-4-56/Dir	6-11-75	13-11-86	227
2231	Mr. Khalid Naeem BA BEd	GHS Landi Aslander FR DIK	1986	29-8-43/DIK R	11-4-76	13-11-86	227
2232	Mr. Muhammad Nazir MA BEd	GHS Khanpur Dir	1984	15-1-57/Dir	18-6-80	13-11-86	227
2233	Mr. Sadiq Jan MA BEd	GMS Badardani Dir	1984	31-8-55/Dir	13-10-75	14-11-86	227

C

GOVERNMENT OF NWFP  
SCHOOLS & LITERACY DEPTT:  
NO.SO(PE)2-6/2006/DPC  
Dated Peshawar the, 7-3-2007

To

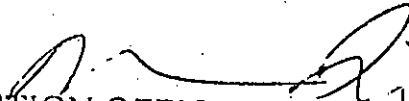
Muhammad Qasim  
Section Officer (SR-II)  
Government of N.W.F.P.  
Finance Department.

10

SUBJECT:- MINUTES OF THE DEPARTMENTAL  
PROMOTION COMMITTEE MEETING HELD ON  
14-2-2007 AT 10.00 AM.

I am directed to refer to the subject noted above and to forward  
herewith minutes of the Departmental Promotion Committee meeting held on  
14-2-2007 for perusal and signature please.

Encl. as above.

  
SECTION OFFICER (PRIMARY)

C

MINUTES OF THE DEPARTMENTAL PROMOTION COMMITTEE  
MEETING HELD ON 14-2-2007.

A meeting of the Departmental Promotion Committee of the Schools & Literacy Department was held on 14-2-2007 at 10.00 am under the Chairmanship of the Secretary Schools & Literacy Department. The following attended the meeting:-

1. Mr. Shafiullah Khan  
Secretary to Govt. of N.W.F.P.,  
Schools & Literacy Department.
2. Mr. Muhammad Tariq Khan  
Deputy Secretary, Govt. of NWFP  
Schools & Literacy Department.
3. Mr. Arif Jamil  
Section Officer (Regulation-1)  
Establishment Department.
4. Mr. Muhammad Qasim  
Section Officer (SR-II)  
Finance Department.
5. S. Manzar Jan,  
Deputy Director  
Directorate of Schools & Literacy  
Peshawar.

In Chair.

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The following item was discussed:-

Item

Grant of Selection Grade BPS-17 to SETs BPS-16.

Opening up the discussion the Committee was apprised that a total of 243 posts are available for grant of selection grade BPS-17 to SETs (BPS-16).

Accordingly grant of selection grade to the following SETs was considered and decisions noted against each taken:-

S.No.	Name & Designation of Officers	Decision
1	Mr. Taj Afsar	The Committee deferred grant of selection grade to the officer concerned for want of full detail of the case.
2	Mr. Iqbal Muhammad	Considered suitable for grant of selection grade wef; 8-4-2001.
3	Mr. Shahid Hayat	Considered suitable for grant of selection grade wef; 8-4-2001
4	Mr. Muhammad Younis	Considered suitable for grant of selection grade wef; 8-4-2001
5	Mr. Manzoor Elahi	The committee desired to know whether the officer died before 8-4-2001 or after the due date for grant of selection grade. The case was therefore deferred.
6	Mr. Muhammad Riaz	The committee deferred the case for want of ACRs for the required period.
7	S. Kamal Shah	Considered suitable for grant of selection grade wef; 8-4-2001

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MD

	Mr. Noor Sharif	Considered suitable for grant of selection grade wef; 8-4-2001	✓
10	Mr. Reayat Khan	Considered suitable for grant of selection grade wef; 8-4-2001	✓
11	Mr. Fazal Nawab	Considered suitable for grant of selection grade wef; 8-4-2001.	✓
12	Mr. Khalid Mian	Considered suitable for grant of selection grade wef; 8-4-2001	✓ 12
13	Muhammad Farooq	Considered suitable for grant of selection grade wef; 8-4-2001	✓
14	Mr. Wali Muhammad	Considered suitable for grant of selection grade wef; 8-4-2001	✓
15	Mr. Muhammad Fayyaz	Considered suitable for grant of selection grade wef; 8-4-2001	✓
16	Muhammad Farooq	The committee did not consider the case as the officer is not entitled to the grant of selection grade.	✗
17	Mr. Zardad Khan	-do-	✗
18	Muhammad Arif	Considered suitable for grant of selection grade wef; 8-4-2001	✓
19	Muhammad Zada	Considered suitable for grant of selection grade wef; 8-4-2001	✓
20	Mr. Faridullah	Considered suitable for grant of selection grade wef; 8-4-2001	✓
21	Mr. Irfanud Din	Considered suitable for grant of selection grade wef; 8-4-2001	✓
22	Mr. Sultan Zeb	The committee did not consider his case as he is not entitled to the grant of selection grade.	✗
23	Mr. Munawar Shah	Considered suitable for grant of selection grade wef; 8-4-2001	✓
24	Mr. Nasir Ahmad	Considered suitable for grant of selection grade wef; 8-4-2001	✓
25	Mr. Shafiur Rehman	Considered suitable for grant of selection grade wef; 8-4-2001	✓
26	Mr. Khalilur Rehman	The committee did not consider the case as the officer is not entitled to the grant of selection grade.	✗
27	Mr. Fayun Khan	Considered suitable for grant of selection grade wef; 8-4-2001	✓
28	Muhammad Iqbal	Considered suitable for grant of selection grade wef; 8-4-2001	✓
29	Mr. Saeed Khan	The committee did not consider the case as the officer is not entitled to the grant of selection grade.	✗
30	Mr. Mir Hassan	Considered suitable for grant of selection grade wef; 8-4-2001.	✓
31	Mr. Hakim Din	Considered suitable for grant of selection grade wef; 8-4-2001	✓
32	Mr. Abdul Karim	Considered suitable for grant of selection grade wef; 8-4-2001	✓
33	Qazi Rashid Ahmad	Considered suitable for grant of selection grade wef; 8-4-2001	✓
34	Mr. Imdad Hussain	Considered suitable for grant of selection grade wef; 25-4-2001	✓
35	Muhammad Nawaz	Considered suitable for grant of selection grade wef; 25-4-2001	✓



37	Muhammad Idris	Considered suitable for grant of selection grade wef; 25-4-2001	✓
38	Mr. Bashir Hussain	Considered suitable for grant of selection grade wef; 25-4-2001	✓
39	Muhammad Jehanzeb	The committee did not consider his case as the officer has already retired from service.	+
✓ 40	Mr. Azizur Rehman	The committee deferred his case for want of ACRs of the officer.	13 +
41	Qazi Adalat	The committee deferred his case for want of ACRs for the required period.	+
42	Muhammad Hassan	Considered suitable for grant of selection grade wef; 25-4-2001	✓
43	Mr. Fazal Rehman	The committee did not consider his case due to his retirement from service.	+
44	Mr. Kala Khan	Considered suitable for grant of selection grade wef; 25-4-2001	✓
45	Mr. Faizur Rehman	Considered suitable for grant of selection grade wef; 25-4-2001	✓
46	Mr. Wazir Muhammad	Considered suitable for grant of selection grade wef; 25-4-2001	✓
47	Muhammad Javed Khan	Considered suitable for grant of selection grade wef; 25-4-2001	✓
48	Muhammad Munsif	Considered suitable for grant of selection grade wef; 25-4-2001	✓
49	Mr. Gul Sher	The committee deferred his case for want of proper justification.	+
50	Mr. Sikandar Khan	Considered suitable for grant of selection grade wef; 25-4-2001	✓
51	Mr. Sardar Khan	Considered suitable for grant of selection grade wef; 25-4-2001	✓
52	Mr. Qadir Khan	Considered suitable for grant of selection grade wef; 25-4-2001	✓
53	Mr. Abdul Majid	Considered suitable for grant of selection grade wef; 25-4-2001	✓
54	Mr. Abdul Karim	The committee did not consider his case due to his retirement from service on 31-12-2000.	+
55	Mr. Awal Khan	Considered suitable for grant of selection grade wef; 25-4-2001	✓
56	Mr. Wali Dad	Considered suitable for grant of selection grade wef; 25-4-2001	✓
57	Muhammad Ayub	Considered suitable for grant of selection grade wef; 1-5-2001	✓
58	Mr. Shahwaiz Hussain	Considered suitable for grant of selection grade wef; 1-5-2001	✓
59	Mr. Khizer Hayat	Considered suitable for grant of selection grade wef; 1-5-2001	✓
60	Mr. Nematullah	Considered suitable for grant of selection grade wef; 1-5-2001	✓
61	Mr. Sikandar Khan	Considered suitable for grant of selection grade wef; 1-5-2001	✓
62	Mr. Habibullah	Considered suitable for grant of selection grade wef; 1-5-2001	✓
63	Mr. Abdus Salam	The committee did not consider him suitable for grant of selection grade.	+
64	Muhammad Rauf Khan	Considered suitable for grant of selection grade wef; 1-5-2001	✓

66	Mr. Faizur Rehman	Considered suitable for grant of selection grade wef; 1-5-2001	✓
67	Muhammad Zahir Shah	Considered suitable for grant of selection grade wef; 1-5-2001	✓
68	Mr. Abdur Rahim	Considered suitable for grant of selection grade wef; 1-5-2001	✓
69	Mr. Shamsul Khetab	Considered suitable for grant of selection grade wef; 1-5-2001	✓ 14
70	Mr. Noor Muhammad	Considered suitable for grant of selection grade wef; 1-5-2001	✓
71	Mr. Iqbal Anwar	The committee did not consider him suitable for grant of selection grade.	✗
72	Mr. Anwar Ali Shah	Considered suitable for grant of selection grade wef; 1-5-2001	✓
73	Mr. Ghaniur Rehman	Considered suitable for grant of selection grade wef; 1-5-2001	✓
74	Mr. Abdul Matin	Considered suitable for grant of selection grade wef; 15-5-2001	✓
75	Mian Sheikh Zada	Considered suitable for grant of selection grade wef; 15-5-2001	✓
76	Mr. Khaista Noor	Considered suitable for grant of selection grade wef; 15-5-2001	✓
77	Muhammad Jabbar	Considered suitable for grant of selection grade wef; 15-5-2001	✓
78	Mian Muambar	Considered suitable for grant of selection grade wef; 15-5-2001	✓
79	Muhammad Hakim	Considered suitable for grant of selection grade wef; 15-5-2001	✓
80	Mr. Inayat ur Rehman	The committee did not consider him suitable for grant of selection grade.	✗
81	Mr. Fazal Sani	Considered suitable for grant of selection grade wef; 15-5-2001	✓
82	Mr. Mumtaz Khan	Considered suitable for grant of selection grade wef; 15-5-2001	✓
83	Mr. Hussain Ahmad	Considered suitable for grant of selection grade wef; 15-5-2001	✓
84	Muhammad Saleh	The committee deferred his case for want of ACRs.	✗
85	Mr. Taj Muhammad	Considered suitable for grant of selection grade wef; 15-5-2001	✓
86	Mr. Fazal Hakim	Considered suitable for grant of selection grade wef; 15-5-2001	✓
✓ 87	Mr. Gul Badshah	The committee deferred selection grade of the officer for want of ACRs.	✗
88	Mr. Bagh Iram	Considered suitable for grant of selection grade wef; 15-5-2001	✓
89	Mr. Abdur Rashid	Considered suitable for grant of selection grade wef; 15-5-2001	✓
90	Mr. Ghulam Akbar	Considered suitable for grant of selection grade wef; 15-5-2001	✓
91	Mr. Salahud Din	Considered suitable for grant of selection grade wef; 15-5-2001	✓
92	Mr. Kishwar Shah	The committee deferred selection grade of the officer due to his retirement from service on 31-8-2000.	✗
93	Mr. Abdur Rehman Saadi	Considered suitable for grant of selection grade wef; 2-6-2001	✓

94 Mr. Habibullah

AD

The meeting ended with thanks from and to the Chair:-

1. Muhammad Qasim  
Section Officer (SR-II)  
Finance Department

2. Arif Jamil  
Section Officer (Regulation-I)  
Establishment Department.

3. S. Manzoor Jan  
Deputy Director  
Directorate of Schools & Literacy  
Peshawar.

4. (Muhammad Tariq Khan)  
Deputy Secretary  
Schools & Literacy Deptt.

(Shafiqullah Khan)

Secretary Schools & Literacy Department.

24/3/07



DEATH CASES

1.	567	Mr. Abdul-ul-Hadi M.A B.Ed	GHS Gujarat Mardan	1973	1/1/1948 Mardan	13/4/1974		Died on 30/10/1996	Death Certificate Attached
2.	642	Mr. Sabz Ali Shah M.A B.Ed	GHSS Gujar Ghari Mardan	1978	9/5/1949 Mardan	28/4/1969	1/10/1979	Died on 28/3/2001	do
3.	1870	Mr. Sardaraz Khan M.A B.Ed	GHS No. 1 Bannu	1979	15/6/42 / Bannu	19/3/66	16/9/85	Died on 22/11/1999	EDO No. 778
4.	1996	Mr. Khawaja Muhammad M.A B.Ed	GHSS TT A.Abad	1982	28/2/1946 A/Abad	1/5/1965	28/4/1985	Died in 1987	do
5.	1959	Mr. Irfan uddin M.A B.Ed	GMS Galoch Swat	1982	1/10/43 / Swat	1/6/65	1/1/85	Died on 10/12/93	

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D-2

**SELECTION GRADED SENIOR ENGLISH TEACHER  
RETIRED BEFORE 30/11/2001**

1	2	3	4	5	6	7	8	9	10
S. No	SET Seniority No	Name & Qualification	Name of School	Year Passing Bed/ Med Examination	Date of Birth Distt of Domicile	Date of 1 <sup>st</sup> Appointment In Education Deptt:	Date of Promotion to Present Post	Retirement Date	Remarks
1.	4	Mr. Mubarik Al M.A B.Ed	GHS Ramora Dir	1974	5/3/41 Sawat	19/9/64	19/11/64	4/3/2001	
* 2.	9 ✓	Mr. Mohammad Aslam M.A B.Ed	GHS Panian A.Abad	1944	7/11/41 A.Abad	4/9/62	1/3/75	6/11/2001	
3.	12	Mr. Naseer Ahmad M.A B.Ed	GHS Civil Quarter Peshawar	1970	6/10/40 Peshawar	18/1/59	8/4/75	5/10/2000	
4.	15	Mr. Zakirullah M.A B.Ed	GHS Pajar Charsadda	1970	15/12/40 Charsadda	10/4/60	20/5/75	14/12/2000	
5.	16	Mr. Karim Bakhsh M.A Isl B.Ed	GHS Lar DIKhan	1970	28/1/41 DIKhan	8/3/61	20/5/75	27/1/2001	
6.	22	Mr. Inayat Khan M.A B.Ed	GMSAsala Swat	1975	30/1/40 Sawat	3/8/56	22/5/75	29/1/2000	
7.	23	Mr. Fazli Qadir M.A B.Ed	GMS Sher Khani Dir	1986	15/8/41 Dir	21/8/67	22/5/75	14/8/2001	
8.	29	Mr. Mohammad Khalid Khan M.A B.Ed	GHS Karori Mansehra	1971	20/8/40 Manshera	7/9/66	10/9/75	19/8/2000	
9.	51	Mr. Muqarab Khan B.A B.Ed	GHS Kotlai Muhammad Khan Bannu	1975	11/6/41 Bannu	9/8/58	15/10/75	10/6/2001	
10.	63	Mr. Jamdad Khan M.A B.Sc B.Ed	GHS Khairabad Mardan	1975	13/3/40 Mardan	1/11/75	8/11/75	12/3/2000	
11.	65	Mr. Murad Ali M.A B.Ed	GHS Maira Gul Abad Charsadda	1970	10/3/41 Charsadda	14/9/63	10/11/75	9/3/2001	
12.	74	Mr. Wahiduz Zaman M.A B.Ed	GHS Giddarpur Manshera	1972	2/1/41 Mansehra	4/4/61	20/11/75	1/1/2001	
13.	75	Mr. Muhammad Aslam B.A B.Ed	GHS No. 3 A.Abad	1971	10/4/38 A.Abad	15/4/61	20/11/75	9/4/1998	
14.	76	Mr. Muhammad Roashan M.A B.Ed	GHS Shakardhand Charsadda	1970	1/10/41 Charsadda	1/4/63	20/11/75	30/9/2001	
15.	77 ✓	Mr. Z. Zakirullah M.A B.Ed	GHS Ambadher Charsadda	1970	20/4/40 Charsadda	31/8/61	20/11/75	19/4/2000	
16.	81	Mr. Muhammad Rafiq M.A B.Ed	ASDEO A.Abad	1973	6/5/41 A.Abad	1/4/63	20/11/75	5/5/2001	
17.	83	Mr. Amin Said M.A B.Ed	GHS Zargi Khel Bannu	1971	11/10/41 Lakkhi	16/4/63	20/11/75	10/10/2001	
18.	127	Mr. Hussain Bakhsh Bukhari M.A B.Ed	GHS Hassa DIKhan	1972	1/6/40 DIKhan	23/4/66	5/12/75	31/5/2000	
19.	185	Mr. Muhammad Rafiq Shah M.A B.Ed	GHS Z.K Sahib NSR	1971	6/1/41 NSR	11/4/64	15/3/76	5/1/2001	
20.	189	Mr. Ashraf Ali Khan M.A B.Ed	GHS Shahbaz Azmath Kheli Bannu	1971	10/8/41 Bannu	20/4/66	15/3/76	9/8/2001	
21.	199	Mr. Muhammad Nawaz B.A B.Ed M.Ed	GHS No. 1 Paharpur (DI Khan)	1974	1/1/40 DI Khan	8/1/64	13/4/76	31/12/1999	
22.	203	Mr. Salahud Din B.A B.Ed M.Ed	GMS Shah Khel Garhi Mansehra	1973	1/1/41 Mansehra	1/4/58	17/4/71	31/12/2000	
* 23. ✓	207	Mr. Muhammad Younas M.A B.Ed	GMS No. 3 Mansehra ✓	1973	3/5/41 Mansehra	10/4/60	17/4/76	2/5/2001	
24.	208	Mr. Jamil Ahmad M.A B.Ed	GMS No. 3 Mansehra	1973	1/2/40 Peshawar	16/11/60	17/4/76	31/1/2000	
25.	210	Azja ur Rehman BA, Bed	GHS Kailag A Abad	1973	5.12.39 A Abad	15.4.72	17/4/76	4/12/99	

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26.	214	Mr. Mustafa Kamal MA, B.Ed	GHS Baringin Mardan	1971	1.1.40 Mardan	15/4/65	17.4/76	31/12/99	
27.	218	Mr. Ahmad Nawaz MA, B.Ed	GMS Chamkani Peshawar	1971	1.1.40 Peshawar	1/5/66	17.4/76	31/12/99	
28.	233	Mr. Qazi Mehtab Ahmad MA, B.Ed	GHS Garhi Habibullah Manshera	1972	15.4.40 Mansehra	1/4/58	5.5/76	14/4/2000	
29. *	234	Mr. Rehman Ulah MA, B.Ed	GHS Khazanda Swat	1975	5.10.41 Swat	17/8/59	6.5/76	4/10/2001	
30.	245	Mr. Rahim Bakhsh MA, B.Ed	GHS No.1 Tank	1973	1.12.40 DI Khan	15/4/62	1/9/76	30/11/2000	
31.	253	Mr. Sher Zada MA, B.Ed	GHS Matta	1976	18.5.41 Swat	5/9/61	15.9/76	19/5/2001	
32.	254	Mr. Taj Muhammad BA, B.Ed, M.Ed	GHS Nahaqi Peshawar	1972	2.1.41 Peshawar	28/9/61	15.9/76	1/1/2001	
33.	256	Mr. Umar Daraz Khan MA, LLB	GHSS No.1 Peshawar City	1971	2.1.41 Peshawar	3/1/63	15.9/76	1/1/2001	
34.	281	Mr. Rahmath Ullah MA, B.Ed	GHS No.1 DI Khan	1973	1.3.40 DI Khan	1/4/57	25.9/76	29/2/2000	
35.	282	Mr. Karim Dad MA, B.Ed	GHS Chitti Dhaki A Abad	1974	15.5.41 A Abad	6/4/60	25.9/76	11/5/2001	
36.	283	Mr. Abdul Haq MA, B.Ed	GHS Dolala A Abad	1972	10.12.39 A Abad	23/4/60	25.9/76	09.12.1999	
37.	289	Mr. Muzaffar Khan MA, B.Ed	GHS No.1 Havalian A Abad	1974	18.8.40 A Abad	24/9/64	25.9/76	17/8/2000	
38.	295	Mr. Abdul Ghaffar MA, B.Ed	GHSS Gul Iman DI Khan	1973	1.1.40 DI Khan	6/10/59	1/10/76	31/12/99	
39.	298	Mr. Muhammad Younas BA, B.Ed	GMS Ghali Banain A Abad	1974	16.3.41 A Abad	19/7/61	4/10/76	15/3/2001	
40.	306	Mr. Fazli Aamin MA, B.Ed	GHSS Mardan	1972	20.10.39 Mardan	20/12/59	28.10/76	19/10/99	
41.	317	Mr. Nazir Ahmad MA, B.Ed	GHSS Nathia Gali A Abad	1974	24.8.40 A Abad	21/9/58	9/11/76	23/8/2000	
42.	333	Mr. Muhammad Rashes MA, B.Ed	GHS Deerai Swat	1976	12.4.41 Swat	5/8/58	21.11/76	11/4/2001	
43.	377	Mr. Khan Sher Fareeq MA, B.Ed	Lahor Swabi	1976	15.5.40 Swabi	15/4/62	28.5/77	13/5/2000	
44.	385	Mr. Sajjad Haider MA, B.Ed	GHS A/c Center Nowshera	19732	24.8.40 NSR	26/6/68	25/7/77	23/8/2000	
45.	386	Mr. Sheik Muhammad Ramzan MA	GHS Paroa DI Khan	1973	5.1.40 DI Khan	12/4/62	1/8/77	04.1.2000	
46.	406	Mr. Abdul Wahab MA, B.Ed	GHS Lahor Swabi	1972	15.9.40 Swabi	1/4/59	8/10/77	14.9.2000	
47.	425	Mr. Dilawar Khan BA, B.Ed	GHS Diplata SWA	1976	16.6.40 SWA	9/62	5/2/78	15/6/2000	
48.	450	Mr. Amin Rehman MA, B.Ed	GHS Nahaqi Peshawar	1972	16.10.40 CHD	10/9/68	7/2/78	15.10.2000	
49.	480	Mr. Inayat Ullah MA, B.Ed	GHS Walizar Kili Bannu	1974	17.8.40 Bannu	15.4.62	18.5.78	16.8.2000	
50.	549	Mr. Hazrath Ullah Jan BA, B.Ed	GHS Reshun Chitral	1976	5.1.40 Chitral	25.5.55	1.12.78	14.1.2000	
51.	573	Mr. Ayaz Khan BA, B.Ed	GMS Land Ahmad Khel	1978	8.2.41 Lakkhi	4.4.64		7/2/2001	
52.	576	Mr. Q. Muhammad Zehid MA, B.Ed	GHS Battagram Mansehra	1978	12.6.40 mansehra	3.6.61		11/6/2000	
53.	600	Mr. Zar Wali Khan BA, B.Ed	GHS Malak Maela SWA	1979	19/1/140 SWA	22.2.67	14.6.79	18.1.2000	
54.	604	Mr. Awal Faqir BA, B.Ed	GHS And Khel Orakazai Agency	1979	6.8.40 Orakazai	10.12.73	14.6.79	05.8.2000	
55.	650	Mr. Abdul Ltif MA, B.Ed	GHS Dara Pezu Bannu	1977	14.12.40 Lakkhi	29.5.61	20/10/79	13.12.2000	
56.	656	Mr. Sharif Gul BA, B.Ed	GHS No. 2 Peshawar Cantt	1973	1/2/40 Peshawar	14/4/60	21/10/79	31/12/2000	

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57.	668	Mr. Shdullah Khas BA, B.Ed	GCHS Kohat	1974	10/2/40 Karak	1/1/61	24/10/79	9/12/2000	
58.	681	Mr. Rahim Shah M.A B.Ed	GHS Mathra Peshawar	1976	22/10/39 Peshawar	28/4/69	1/11/79	21/10/1999	
59.	686	Mr. Muhammad Ishaq Bad, B.Ed	GHS Mohar Mansehra	1977	9/1/40 A.Abad	4/12/64	7/11/79	8/1/2000	
60.	708	Mr. Muhammad Aslam M.A B.Ed	GHS Takia Saikhan A.Abad	1978	6/4/41 A.Abad	15/4/61	18/11/79	5/4/2001	
61.	711	Mr. Muhammad Ismail M.A B.Ed	GHS Sherpura Mansehra	1978	10/10/41 Mansehra	15/4/61	23/11/79	9/10/2001	
62.	730	Mr. Hisamud Din M.A B.Ed	GHS Abazai Charsadda	1973	1/10/40 Charsadda	2/4/66	12/1/80	30/9/2000	
63.	735	Mr. Muhammad Akram B.A B.Ed	GHSS NO. 1 Peshawar City	1979	1/12/41 Peshawar	7/8/1961	8/2/80	31/11/2001	
64.	748	Mr. Ghulam Hassan B.A B.Ed	GHS Sarki Ghari Orakzai	1974	7/5/40 Orakzai	21/6/62	13/6/80	6/5/2000	
65.	767	Mr. Muhammad Younas B.A B.Ed	GHS No. 4 A.Abad	1979	5/5/40 A.Abad	3/4/57	18/7/80	4/5/2000	
* 66. ✓	830	Mr. Abdul Ghafoor M.A B.Ed	GHS Balogram Sawat	1977	5/8/41 Sawat	17/5/58	7/11/80	4/8/2001	
67.	842	Mr. Kifayat Ullah Khan B.A B.Ed	GMS Daraban	1976	1/7/41 DI Khan	7/3/71	25/11/80	30/6/2001	
68.	870	Mr. Safdar Khan M.A B.Ed	GMS Jehangir Pura	1974	2/2/41 Charsadda	1/2/60	14/2/81	1/2/2001	
69.	871	Mr. Mohammad Afzal B.A B.Ed	GHS Miani Swabi	1974	1/3/41 Swabi	5/4/64	16/2/81	28/2/2001	
70.	913	Mr. Abdul Latif M.A B.Ed	GHS Sara Dargai FR Peshawar	1980	9/11/40 FR Peshawar	2/5/74	15/5/82	8/11/2000	
* 71. ✓	931	Mr. Gul Rahim M.A B.Ed	GMS Patti Kalam Mardan	1981	1/9/40 Mardan	2/10/68	9/8/81	31/8/2000	
72.	961	Mr. Zakirullah M.A B.Ed	GHS Saroshah Mardan	1975	13/6/41 Mardan	13/9/62	14/9/81	12/6/2001	
73.	963	Mr. Mohammad Ayub M.A B.Sc B.Ed	GMS Asota Srif Swabi	1975	15/6/41 Swabi	15/9/64	15/9/81	14/6/2001	
74.	1042	Mr. Mohammad Anwar M.A B.Ed	GHS Hawalian Haripur	1979	12/9/41 A.Abad	1/4/63	28/10/81	11/9/2001	
75.	1089	Mr. Faz Ali Shah M.A B.Ed	GHSS Chamkani Peshawar	1976	1/12/40 Peshawar	6/5/61	24/11/81	30/11/2000	
76.	1098	Mr. Mohammad Shrif B.A B.Ed	GHS No. 4 Kakshal Peshawar	1977	24/9/40 Peshawar	15/11/60	2/12/81	23/9/2000	
77.	1127	Mr. Fayyaz ur Rehman M.A B.Ed	GHS Khair Abab Mardan	1978	17/10/40 Mardan	1/4/60	27/2/82	16/10/2000	
78.	1226	Mr. Amir Hamza B.A B.Ed	GHS Kalam Sawat	1979	3/1/40 Sawat	11/6/73	14/10/82	2/1/2000	
79.	1251	Mr. Pioullah Khas, SET B.A B.Ed	GHS Gurguri Karak	1979	14/8/40 Karak	11/10/60	26/10/82	13/8/2000	
80.	1269	Mr. Shamsullah Akbar B.A B.Ed	GHS Pir Abad Mardan	1977	1/5/40 Mardan	1/4/60	8/11/82	30/4/2000	
81.	1279	Mr. Fazur Rehman M.A Ist, B.A B.Ed	GHS Maddi DIK	1977	1/6/40 DI Khan	1/4/59	15/11/82	31/5/2000	
82.	1280	Mr. Abdul Majeed B.A B.Ed	GHS No. Lakki	1977	5/9/41 Bannu	6/10/64	15/11/82	4/9/2001	
83.	1306	Mr. Mohammad #yas M.A Urdu B.Ed	GHS Hoti Lankakai Mardan	1981	12/10/41 Mardan	5/4/66	12/12/82	11/10/2001	
* 84.	1319	Mr. Kishwar M.A B.Ed	GHS No. 3 Mardan	1977	1/10/40 Mardan	1/11/66	18/12/82	30/9/2000	
85.	1329	Mr. Muamber Stanat M.A Urdu B.Ed	GHS Dargai Malakand	1981	1/1/41 MKD	1/4/61	1/1/83	31/12/2000	
86.	1369	Mr. Ghulam Haider	GHS No. 2 Tangi Chrd.	1981	1/1/41 Malakand	3/7/68	10/3/83	31/12/2000	
87.	1405	Mr. Haq Nawaz B.A B.Ed	GHS Ibrahim Khan Killi Mardan	1969	1/6/41 Mardan	5/10/68	1/7/83	31/5/2001	



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88.	1434	Mr. Mohammad Ayub M.A B.Ed	GHS Battagram Mansehra	1982	22/11/41 Manshera	10/6/61	11/10/83	21/11/2001	
89.	1572	Mr. Akhtar Munir M.A B.Ed	GHS Dtmanzai Charsadda	1978	22/11/41 Charsadda	10/2/63	14/3/84	21/11/2001	
90.	1689	Mr. Azmar Ali Khan M.A B.Ed	GHS Manari Payan Swabi	1982	3/11/41 Swabi	22/9/68	20/10/84	2/11/2001	
91.	1664	Mr. Mohammad Jan B.A B.Ed	GHS Najab Pur A.Abad	1981	20/3/40 A.Abad	5/9/62	22/10/84	19/3/2000	

D-3

D-3 (A)  
Promoted SET  
Selection grade

**LIST OF DIRECT SLEETED SELECTION GRADED SET's PROMOTED TO VARIOUS POSTS BY PSC NWFP**

Sl No	Seniority Numbers	Name & Qualification	Name of School	Year of Passing Bed/ Med	Date of Birth Domicile	Date of 1st Appointment in Edus Dpplt	Date of Promotion to the present grade	20	Remarks
1.	10	Mr. Ghulam Nabi B.A B.Ed	GHS Gandian Mansehra	1974	15/4/46 Mansehra	2/8/64	1/3/75		Promoted HMB 17 No. So(S) 5-1/93 date: 21/4/93 S NO. 21
2.	21	Mr. Muhammad Ibrahim M.A B.Sc. B.Ed	GHS Pakhtano Khadag zai DIR	1974	15/10/51 DIR	15/6/72	20/5/75		Prt. B. 18 No. So(S) 5-1/99 dt: 18/5/2000 SNo: 15
3.	27	Mr. Muhammad Jamail M.A B.Ed	AREO Mansehra	1971	3/10/44 Mansehra	6/4/64	20/11/75		Promoted to HMB 17 No. SO (S)/ 93 Date 21/4/93 SNo: 49
4.	99	Mr. Naeemullah B.A B.Ed	GHS Shakar Pand	1971	1/6/46 Charsadda	29/6/67	20/11/75		Working as Prt. B: 18 Distt: Charsadda
5.	112	Mr. Salah Uddin B.Sc B.Ed	GHS No. 4 Kakshal Peshawar	1975	4/3/53 Peshawar	4/11/75	20/11/75		HM, Vide No. So(s) 5-1/93 dt: 21/4/93 S.No: 10
6.	148	Mr. Muhammad Ayub Khan S.A B.Ed	GHS Lalozai Bannu	1972	6/4/72 Bannu	6/4/66	10/1/76		Promoted to HMB 17 No. SO (S)/ 93 Date 21/4/93 SNo: 31
7.	156	Mr. Munir Ahmad B.Sc M.Ed	GHS No. 1 Bannu	1975	25/9/49 Bannu	16/1/76	16/1/76		Promoted to HMB 17 No. SO (S)/ 93 Date 21/4/93 SNo: 45
8.	344	Mr. Noer Ayaz M.A B.Sc B.Ed	GHS Hari Chand	1976	12/11/52 Mardan	15/12/76	15/12/76		HM, Vide No. So(s) 5-1/93 dt: 21/4/93 S.No: 33
9.	345	Mr. Shahzada B.Sc. B.Ed	GHS Munda Dir	1976	8/7/51 DIR	16/12/76	16/12/76		Promoted to HMB 17 No. SO (S)/ 93 Date 21/4/93 SNo: 15
10.	354	Mr. Bakhtawar Khan M.A B.Ed	GHS Agra Mkd	1976	25/10/49 Mkd	20/3/73	6/1/77		Promoted to HMB 17 No. SO (S)/ 93 Date 21/4/93 SNo: 29
11.	389	Mr. Anwar-ul-Haq M.A B.Sc B.Ed	GHS Mainai Swabi	1976	20/1/55 Swabi	23/10/76	21/9/77		HM, Vide No. So(s) 5-1/93 dt: 21/4/93 S.No: 47
12.	404	Mr. Muhammad Ismail M.A B.Ed	GHS Nazar Abad Swat	1976	5/1/50 Swat	1/10/68	1/10/77		Head Master B 17 No. So S/93 dat 11/2/99 SNo: 50
13.	421	Mr. Jamal ud din MA, Bed	GHS No. 1 Peshawar City	1978	1/10/54 Peshawar	1/2/78	1/2/78		Prt. B: 18 No. So(S) 5-1/97 dt: 23/11/98 SNo. 8
14.	432	Mr. Aziz ur Rahman M.A B.Ed	GHS Ouch Dir	1978	10/3/50 DIR	14/10/67	5/2/78		Promoted to HMB 17 No. SO (S)/ 95 Date 8/5/96 SNo: 4
15.	475	Mr. Ghulam Farid M.A M.Ed	GHS Kangra Colony A.Abad	1978	29/10/49 A.Abad	14/5/78	14/5/78		Promoted to HMB 17 No. SO (S)/ 93 Date 21/4/93 SNo: 11
16.	532	Mr. Mian Zaman M.A B.Sc B.Ed	GHS Kabgani (Swabi)	1978	12/12/53 Swabi	7/5/1978	24/10/78		HM: NO: So(S) 5-1/93 dt: 21/4/93 SNo. 1
17.	533	Mr. Said Rahman M.A B.Sc B.Ed	GHS Zurab Gul Killi	1978	4/4/56 Charsadda	10/5/78	24/10/78		Prt. B: 18 No. So(S) 5-1/97 dt: 23/11/98 SNo. 16
18.	646	Mr. Haidar Shah M.A B.Ed	GHS No. 2 Bicket Gunj Mardan	1979	1/3/47 Mardan	1/5/69	18/10/79		HM, Vide No. So(s) 5-1/93 dt: 21/4/93 S.No: 48
19.	649	Mr. Sher Ahmad Shah M.A M.Ed	GHS No. 1 DIK	1979	16/6/48 DIK	2/9/72	19/10/72		Promoted to PRL B 18 SoS 5-1/99 dt: 18/5/2000 SNo: 16
20.	728	Mr. Muhammad Bashir M.A M.Ed	ASDEO A/Abad	1979	1/9/50	1/7/70	12/12/79		Promoted to HMB 17 No. SO (S)/ 93 Date 21/4/93 SNo: 4
21.	777	Mr. Inayat ullah M.A B.Ed	GHS Wonda Madat DIK	1979	1/1/54 DIK	15/9/80	15/9/80		Promoted to HMB 17 No. SO (S)/ 93 Date 21/4/93 SNo: 2
22.	782	Mr. Mirza Ali Khan	GHS Hazar Jan Laki	1977	1/1/54 Bannu	16/10/76	10/10/80		Promoted to Principal. 8-18
23.	853	Mr. S. Abbas Ali Shah M.A B.Ed	GHS No. 1 Hangu	1976	18/12/42 Kohat	6/2/63	28/1/81		Prt. B: 18 No. So(S) 5-1/99 dt: 18/5/2000 SNo. 38
24.	890	Mr. Masal Khan M.A B.Sc B.Ed	GHS Shakoer Charsadda	1981	15/4/58 Charsadda	10/2/81	10/3/81		HM, Vide No. So(s) 5-1/93 dt: 21/4/93 S.No: 2
25.	915	Mr. Khair Mohammad M.A B.Ed	GHS Sari Balol Mardan	1981	15/2/53 Mardan	1/9/72	24/5/81		HM, Vide No. So(s) 5-1/95 dt: 8/5/95 S.No: 2
26.	920	Mr. Fazli Malik M.A B.Ed	GHS Pir Saddi Mardan	1974	5/1/50 Mardan	1/9/70	30/5/81		HM, Vide No. So(s) 5-1/93 dt: 21/4/93 S.No: 39

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58.	2009	Mr. Iqbal Anwar M.Sc. Med	GHS Lund Khawar	1985	1/12/56 Mardan	17/12/85	1/1/86	Pri:B:18 No. So(S) 5-1/99 dt: 18/5/2000 SNo.35
59.	2039	Mr. Ismi Ali M.A B.Sc B.Ed	GHS Khadizai Kohat	1986	10/1/52 Kohat	7/9/71	2/12/86	Promoted to HMB 17 No. SO (S) 93 Date 21/4/93 SNo: 41
60.	2067	Mr. Nisar ul Haq B.Sc B.Ed	GHS Mattra Peshawar	1986	12/3/60 Peshawar	18/10/1983	22/3/1986	B:18 No. So(S) 5 - 1/98 dt: 11/2/99 S No. 6
61.	2104	Mr. Sultan Mahmood M.Sc B.Ed.	GHS Gambar Swat	1986	21/12/55 Swat	17/6/86	17/6/86	Pri:B:18 No. So(S) 5-1/99 dt: 18/5/2000 SNo.2
62.	2120	Mr. Attaullah B.A B.Ed.	GHS Khaingi FR DIK	1986	14/3/54 FR DIK	20/6/76	1/9/86	Pri:B:18 No. So(S) 5-1/99 dt: 18/5/2000 SNo.29
63.	2144	Mr. Tajmoor Khan B.Sc B.Ed	Kag A/Abad	1982	21/12/55 Swat	17/6/86	17/6/86	B:18 No. So(S) 5 - 1/98 dt: 11/2/99 S No. 14
64.	2168	Mr. Akbar Hysain M.Sc B.Ed	GHS No. 1 Mingra Swat	1985	3/1/57 Swat	25/10/86	25/10/86	Pri:B:18 No. So(S) 5-1/99 dt: 18/5/2000 SNo.33
65.	2179	Mr. Qamar Ali B.Sc. B.Ed	GHS Shah mansoor Swabi	1986	15/12/52 Swabi	16/10/85	26/10/86	Working as Pri:B:18 in Distt: Swabi
66.	2180	Mr. Fida Muhammad M.A B.Ed	GHS Gumhat Marikan	1985	12/12/60 Mardan	26/10/86	26/10/86	Pri:B:18 No. So(S) 5-1/99 dt: 18/5/2000 SNo.54
67.	2187	Mr. Noor ul Wahab M.A B.Ed	GHS Jalbai Swabi	1986	10/7/51 Mardan	28/11/76	28/10/86	Pri: B:18 No. So(S) 5-1/97 dt: 23/11/98 SNo. 22
68.	2211	Mr. Muhammad Javid M.Sc B.Ed	GHS Raja Swabi	1984	31/3/61 Mardan	6/11/86	6/11/86	B:18 No. So(S) 5 - 1/98 dt: 11/2/99 S No. 10
69.	2243	Mr. Misal Khan B.A B.Ed	GMS Mali Khel	1981	12/12/48 Mardan	19/5/86	1/12/86	Promoted to HMB 17 No. SO (S) 5-1/98 dt: 11/2/99 SNo: 25
70.	2253	Mr. Mhammad Rahman B.Sc B.Ed	GHS Era Adam keh FR Kohat	1986	15/2/61 FR Kohat	20/3/83	14/12/86	B:18 No. So(S) 5 - 1/98 dt: 11/2/99 S No. 38
71.	2256	Mr. Jehan Muhammad M.A B.Ed	GHS No. 2 Nowshera	1986	4/1/61 Nowshera	26/10/85	14/12/86	B:18 No. So(S) 5 - 1/98 dt: 11/2/99 S No. 26
72.	2301	Mr. Liaqat Ali B.Sc B.Ed	GHS Dabgari Gata Peshawar	1986	12/5/53 Nowshera	21/1/84	26/1/87	B:18 in Distt: Nowshera
73.	2302	Mr. Hamid Ali M.A B.Sc B.Ed	GHS Manki Swabi	1986	1/4/62 Swabi	13/12/86	26/1/87	B:18 No. So(S) 5 - 1/98 dt: 11/2/99 S No. 3
74.	2309	Mr. Fazli Malik M.A B.Ed	GHS Khain Abad Mardan	1984	25/5/58 Mardan	22/9/1976	27/1/87	Pri: B:18 No. So(S) 5-1/97 dt: 23/11/98 SNo. 20
75.	2329	Mr. Abdul Jabbar Khan M.Sc B.Ed	GHSS Bannu	1986	21/2/81 Bannu	1/2/87	1/2/87	B:18 No. So(S) 5 - 1/98 dt: 11/2/99 S No. 13
76.	2341	Mr. Attaullah Khan M.Sc M.Ed	GHS No. 3 Laki	1986	18/3/60 Bannu	16/2/87	16/2/87	Promoted to PRL B 18 SoS 5-1/97 dt: 23/11/98 SNo: 5

بخدمت جناب سیکرٹری صاحب ایگزیکٹو ایڈسٹریٹری ایجوکیشن خیبر پختونخوا ایشاد

عنوان: Double Enlisted, Died, Retired & Promoted

سلیکشن گریڈ کے حامل SET's (مردانہ) کی جگہ پر مزید مقدار SET's کو سلیکشن گریڈ ایوارڈ کرنا۔

جناب عالی:

- عرض ہے کہ بحوالہ نمبر List 3199-3233/A-88/S 14/09/1974 مورخہ 14/09/1974 تا سیریل نمبر 7279 مورخہ 12/07/1999 جناب ڈائریکٹر ایگزیکٹو ایڈسٹریٹری ایجوکیشن خیبر پختونخوا ایشاد کے شائع شدہ SET's نیٹ ورک کے مطابق سلیکشن گریڈ کے بارے میں چند گزارشات پیش کی جاتی ہیں۔
- (1) مکہ تعلیم کی جانب سے سیکرٹری ایگزیکٹو ایڈسٹریٹری ایجوکیشن صوبہ خیبر پختونخوا کی سرپرستی میں مورخہ 14/02/2007 کو سلیکشن گریڈ کے لئے مستفادہ اجلاس میں 30/06/2001 تک صوبہ بھر میں اصلاح اور ایجنسیوں کی سطح پر منظور شدہ SET's (مردانہ) پوسٹوں کی کل تعداد 7532 تھی جن میں 1243 اساتذہ سلیکشن گریڈ کے حقدار تھے۔
- (2) 33 فیصد کے حساب سے 29/08/2001 کو جاری کردہ فائنل لسٹ کے مطابق نیٹ ورک نمبر 2223 (سینیئر ایڈووکیٹ) کو سلیکشن گریڈ سکیل 17 ایوارڈ کیا گیا ہے۔
- (3) مذکورہ نیٹ ورک لسٹ میں پانچ ایسے SET's کے نام بھی ہیں جو Double Enlisted ہیں۔
- (4) مذکورہ نیٹ ورک لسٹ میں پانچ ایسے SET's کے نام شامل ہیں جو وفات پا چکے ہیں۔
- (5) مذکورہ سلیکشن گریڈ کے حامل SET's 91 تا 30/11/2001 سے قبل ریٹائر ہو چکے ہیں۔
- (6) مذکورہ نیٹ ورک لسٹ میں گریڈ پیپک سرورس کیشن کے ذریعے ریٹائر سکیل 17 یا 18 میں پروموت ہو چکے ہیں، جن کی کل تعداد 177 بنتی ہے۔
- (7) سلیکشن گریڈ رولز کے مطابق مزید 177 اساتذہ 30/11/2001 تک سلیکشن گریڈ سکیل نمبر 17 کے حقدار ہیں جن میں مسائل کا نیٹ ورک نمبر ہے۔

یاد رہے کہ 30/11/2001 تک موجود SET's کی پوسٹوں پر 33% کے حساب سے SET's کو سلیکشن گریڈ سکیل نمبر 17 ملے گا تاہم 30/11/2001 تک اگر سلیکشن گریڈ کے حامل کوئی SET وفات پا جائے یا ریٹائر ہو جائے یا ریٹائر سکیل نمبر 17 یا 18 میں پروموت ہو جائے تو اس کی جگہ پر نیٹ ورک کے مطابق اگلے حقدار کو اسی تاریخ سے سلیکشن گریڈ ایوارڈ کیا جائے گا۔ لہذا مسائل کو قواعد کے مطابق سلیکشن گریڈ ایوارڈ کے احکامات صادر کئے جائیں۔

(العارض)

نام

دستخط

پتہ: مطابق سابقہ نیٹ ورک لسٹ

(پرانا) نیٹ ورک لسٹ نمبر

2337

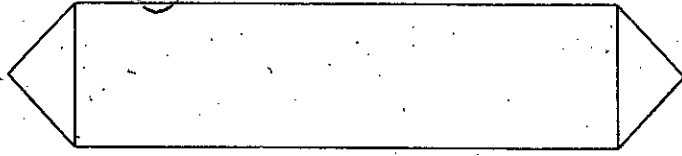
موجودہ پتہ

تاریخ: 30/9/11

SET ex صدر دفتر

گورنمنٹ ہائی اسکول خانپن  
صدر دفتر علی علی صورت

# بعدالت سرسند سولج



مورثہ  
مقدمہ  
دعویٰ  
جرم

16 صوراہ 2012ء پنجاب

صدر کار بنام صاحب

## باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے

اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

المرقوم 16 ماہ صوراہ 2012ء

*(Handwritten signature)*

الع دگ الع واہ الع

کے لئے منظور ہے۔

*(Handwritten signature)*

محرم صیاب حضرتین روایتیں لکھنا

مذہبِ حق سے محبت

دوسری کتاب میں تاریخ میں

22/2/12

مذہبِ حق سے محبت اور اس سے

یہ کہ فقہ عزان نامہ میں تاریخ میں برائے محبت

یہ کہ فقہ عزان نامہ میں تاریخ میں برائے محبت  
تاریخ میں برائے محبت اور اس سے

یہ کہ فقہ عزان نامہ میں تاریخ میں برائے محبت  
تاریخ میں برائے محبت اور اس سے

تاریخ میں برائے محبت اور اس سے  
22/2/12

**"B"**

*Pre-Admission Notice*

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
**JUDICIAL COMPLEX (OLD), KHYBER ROAD,**  
**PESHAWAR.**

*P. B*

No.

Appeal No..... *62* ..... of 20 *12*

..... *Asad Khan* ..... Appellant/Petitioner

Versus

..... *Secy. Govt. Peshawar* ..... Respondent

Respondent No..... *1* .....

Notice to:

*Agent of Secy Govt Peshawar*

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on..... *8.00 A.M.* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No..... dated.....~~

Given under my hand and the seal of this Court, at Peshawar this..... *10/12* .....

Day of..... *April* ..... 20 *12*

*[Signature]*  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

No.

Appeal No..... *121* ..... of 20 *12*

*At. Gh. B. Khan* ..... Appellant/Petitioner

Versus

*Secy. Edu. Dept. Pesh.* ..... Respondent

Respondent No..... *2* .....

Notice to: *Director (S.L) Edu. Dept. Pesh.*

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 14.5.12 at 8.00 A.M.* If you wish to urge anything against the appelland/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No..... dated.....

Given under my hand and the seal of this Court, at Peshawar this.....

Day of..... *April* ..... 20 *12*

*17/4/12*

*[Signature]*  
Registrar

*[Signature]* Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.



**"B"**

*Pvc - Admission Name*  
**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

No.

Appeal No. *67* of 20 *12*

*Gulab* Appellant/Petitioner

Versus

*Sarg. E. Khan ICPLA Pesh* Respondent

Respondent No. *4*

Notice to: -

*Sarg. to Sarg. of ICPLA Services  
Deptt ICPLA Pesh.*

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue, You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on *14/5/12* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. .... dated .....

Given under my hand and the seal of this Court, at Peshawar this *14/5/12*

Day of *April* 20 *12*

*[Signature]*  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
**JUDICIAL COMPLEX (OLD), KHYBER ROAD,**  
**PESHAWAR.**

P.13

No.

Appeal No.....6.2..... of 20

.....Orullab Khan.....Appellant/Petitioner

Versus

.....Secretary, Educ. P.P.K. Pesh......Respondent

Respondent No.....2.....

Notice to: - Secretary to Government of Khyber Pakhtunkhwa, Finance Department, Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....25.6.2012.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 15.6.2012

Day of.....June.....20

01 YFW  
14/6/12

[Signature]  
Registrar  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.**

*F.B. 11*

No.

Appeal No. *62* of 20*12*

*Gulab Khan* Appellant/Petitioner

*Soyy. Educ. KPk Pesh.* Respondent

Respondent No. *4*  
*Soyy. to Govt. of KPk Services Deptt.*

Notice to: —

*Peshawar*

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on *8-10-2012* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....*29/6*.....

Day of.....*June*.....20 *12*

*[Signature]*  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.**

*F.B.T*

No.

Appeal No. .... *62* ..... of 20 *12*

..... *Shahid Khan* ..... Appellant/Petitioner

Versus

..... *Sgt. Farid (1st Lt. Sgt.)* ..... Respondent

Respondent No. .... *3* .....

Notice to:

*Sgt. to Capt. of 1st Lt. Finance Deptt.  
Peshawar*

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on *29/6/12* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. .... dated .....

Given under my hand and the seal of this Court, at Peshawar this *29/6/12* .....

Day of *June* ..... 20 *12*

*[Signature]*  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.**

F-13 II

No.

Appeal No..... 62 ..... of 20 12

Amir Khan ..... Appellant/Petitioner

Versus

Serg. Edu. 10PK Pesh. ..... Respondent

Respondent No..... 2 .....

Notice to: Director Edu (EG SE) 10PK Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on..... 8-10-2012 ..... at 8.00 A.M. If you wish to urge anything against the appellatant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

~~Copy of appeal is attached.~~ Copy of appeal has already been sent to you vide this office Notice No..... dated.....

Given under my hand and the seal of this Court, at Peshawar this..... 29/12 .....

Day of..... June ..... 20 12

62  
4/7/12

[Signature]  
Registrar  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.**

*F. B. 11*

No.

Appeal No. .... *62* ..... of 20 *12*

..... *Gulab Khan* ..... Appellant/Petitioner  
Versus

..... *Secy. Edu. to Mr. Pasai* ..... Respondent  
Respondent No. .... *J* .....

Notice to: —

*Govt. of KP Secy. (E & SE) KP/16  
Peshawar.*

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on *8-12-2012* at **8.00 A.M.** If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing **4 copies** of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

~~Copy of appeal is attached.~~ Copy of appeal has already been sent to you vide this office Notice No. .... dated .....

Given under my hand and the seal of this Court, at Peshawar this *29th* Day of *June* 20*12*.

*[Signature]*  
Registrar,  
Khyber Pakhtunkhwa Service Tribuna  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.**

No.

F.B. 11

Appeal No..... 62 ..... of 20 12

..... Appellant/Petitioner

Versus

Through Secy: Edu: K.P.T.S. Pesh: Respondent

Respondent No..... 4 .....

Notice to:

- Secy: To Govt. of K.P.K. Services Deptt. Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on..... at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....

Day of..... 20 12

Registrar,

Khyber Pakhtunkhwa Service Tribunal, Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
  2. Always quote Case No. While making any correspondence.

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

SERVICE APPEAL NO:  62/12

**Gulab Khan(Ex-SET) Head Master GHS Khankhel Mandozai, District Lakki Marwat.**  
.....Appellant.

**VERSUS**

- 1 Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa & others.
- 2 Director Elementary & Secondary Education KPK Peshawar.
- 3 Secretary Finance Department Khyber Pakhtunkhwa.Peshawar.
- 4 Secretary Services Department, Khyber Pakhtunkhwa, Peshawar. ....Respondent

**PARAWISE COMMENTS ON BEHALF OF RESPONDING No; 1 to 3**

Respectfully Sheweth :-Respondent submitted as under:-

**PRELIMINARY OBJECTIONs.**

- 1 That the appeal is badly barred by time.
- 2 That the appellant has not come to this Hon! able court with clean hands.
- 3 That the appeal is not maintainable in its present form.
- 4 That the appellant has suppressed/concealed important material facts from this Hon! able court.
- 5 That the appellant has filed this appeal with malafide in tensions.
- 6 That the instant appeal has been filed to pressurize the respondents to succumb to the illegal demands of the appellant.
- 7 That the appellant has been estopped by his own conduct to file the instant appeal.
- 8 That the appeal is not entertain able & maintainable.
- 9 That the appeal is bad for non joinder of necessary party who is Principal respondent and mis-joinderof unnecessary parties.
- 10 That the appellant has no cause of action against the answering respondents.
- 11 That the appellant is not competent to file the instant appeal against the respondents.

**FACTS**

- 1 This para pertaining to the service record of the appellant while it is worth mentioning that the appellant did not present the details of his service details supported by documents.



- 45
- 2 The said notification is in accordance with law & rules. The selection grade awarded to the SETs up to 12-11-1986.
  - 3 This para pertain to office record hence need no comments.
  - 4 As replied in para 3 above.
  - 5 The statement of the appellant in this para is baseless, against the facts and with out any legal proof. The annexure "D" to D/3 of the appeal arte without signatures date and no mention of department.
  - 6 Incorrect and not admitted, in fact that the appellant service has been approved after 12-11-1986, while the department has awaited all available quota/strength of selection grade posts and has been awarded selection grade B-17 to SET (male) up to 12-11-1986 i.e the date of approval. Now the government has discontinued awarding selection grade after 01-12-2007. It would not be out of context to mention here that at present, no selection grade post is available in the Education Department regarding the SET cadre, which can be awarded to the appellant. It is also pertinent to mention here that the appellant is upgraded to B-17 (Personal) and promoted to B-17 regular as Head master.
  - 7 Incorrect & not admitted.
  - 8 The appellant has not cause of action and the present appeal is liable to be dismissed on the following grounds among the others.

## GRONDS

- a Incorrect not admitted. The appellant is not entitled for selection grade. The statement of the appellant is baseless, against the facts, without legal proof and bard on Malafids motives. The appeal in bad for not joined/miss joiner of necessary pertain hence line to be dismissed.
- b Incorrect & not admitted the statement of the appellant is a mere connected story.
- c As replied in para above .
- d Incorrect and not admitted the department is performing its duties remarkably and in accordance with rules, law and policy while the appellant has not legal right of selection grade.
- e Incorrect & not admitted the statement of the appellant in this papra is false and malafids one.
- f In correct and not admitted, the appellant is not entitled for selection grade as per prevailing law, rules and Government policy, the respondents also seek permission of the Hon! able court to address more grounds during the hearing of the present appeal.

**In view of the above made submissions, it is requested that this Hon! able Tribunal may very graciously be placed to dismiss the instant appeal with cost in favor of the respondents Department.**

Secretary,  
Elementary & Secondary Education  
Department Khyber Pakhtunkhwa.

Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar.

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

SERVICE APPEAL NO: 62/12

**Gulab Khan (Ex-SET) Head Master GHS Khankhel Mandozai, District Lakki  
Marwat. ....Appellant.**

**VERSUS**

- 1 Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa & others
- 2 Director Elementary & Secondary Education KPK Peshawar.
- 3 Secretary Finance Department Khyber Pakhtunkhwa, Peshawar.
- 4 Secretary Services Department, Khyber Pakhtunkhwa, Peshawar. ....Respondent

**PARA WISE COMMENTS ON BEHALF OF RESPONDING No; 1 to 3**

Respectfully Sheweth :-Respondent submitted as under:-

**PRELIMINARY OBJECTIONS.**

- 1 That the appeal is badly barred by time.
- 2 That the appellant has not come to this Hon! able court with clean hands.
- 3 That the appeal is not maintainable in its present form.
- 4 That the appellant has suppressed/concealed important material facts from this Hon! able court.
- 5 That the appellant has filed this appeal with malafide intentions.
- 6 That the instant appeal has been filed to pressurize the respondents to succumb to the illegal demands of the appellant.
- 7 That the appellant has been estopped by his own conduct to file the instant appeal.
- 8 That the appeal is not entertain able & maintainable.
- 9 That the appeal is bad for non joinder of necessary party who is Principal respondent and mis-joinder of unnecessary parties.
- 10 That the appellant has no cause of action against the answering respondents.
- 11 That the appellant is not competent to file the instant appeal against the respondents.

**FACTS**

- 1 This para pertaining to the service record of the appellant while it is worth mentioning that the appellant did not present the details of his service details supported by documents.

- 2 The said notification is in accordance with law & rules. The selection grade awarded to the SETs up to 12-11-1986.
- 3 This para pertain to office record hence need no comments.
- 4 As replied in para 3 above.
- 5 The statement of the appellant in this para is baseless, against the facts and with out any legal proof. The annexure "D" to D/3 of the appeal arte without signatures date and no mention of department.
- 6 Incorrect and not admitted, in fact that the appellant service has been approved after 12-11-1986, while the department has awaited all available quota/strength of selection grade posts and has been awarded selection grade B-17 to SET (male) up to 12-11-1986 i.e the date of approval. Now the government has discontinued awarding selection grade after 01-12-2007. It would not be out of context to mention here that at present, no selection grade post is available in the Education Department regarding the SET cadre, which can be awarded to the appellant. It is also pertinent to mention here that the appellant is upgraded to B-17 (Personal) and promoted to B-17 regular as Head master.
- 7 Incorrect & not admitted.
- 8 The appellant has not cause of action and the present appeal is liable to be dismissed on the following grounds among the others.

### GRONDS

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- f In correct and not admitted, the appellant is not entitled for selection grade as per prevailing law, rules and Government policy, the respondents also seek permission of the Hon! able court to address more grounds during the hearing of the present appeal.

**In view of the above made submissions, it is requested that this Hon! able Tribunal may very graciously be placed to dismiss the instant appeal with cost in favor of the respondents Department.**

Secretary,  
Elementary & Secondary Education  
Department Khyber Pakhtunkhwa.

Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar.

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

SERVICE APPEAL NO: 62/12

Gulab Khan (Ex-SET) Head Master GHS Khankhel Mandozai, District Lalki  
Marwat. ....Appellant.

**VERSUS**

- 1 Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa & others
- 2 Director Elementary & Secondary Education KPK Peshawar.
- 3 Secretary Finance Department Khyber Pakhtunkhwa, Peshawar.
- 4 Secretary Services Department, Khyber Pakhtunkhwa, Peshawar. ....Respondent

**PARAWISE COMMENTS ON BEHALF OF RESPONDING No: 1 to 3**

Respectfully Sheweth :-Respondent submitted as under:-

**PRELIMINARY OBJECTIONS.**

- 1 That the appeal is badly barred by time.
- 2 That the appellant has not come to this Hon! able court with clean hands.
- 3 That the appeal is not maintainable in its present form.
- 4 That the appellant has suppressed/concealed important material facts from this Hon! able court.
- 5 That the appellant has filed this appeal with malafide intentions.
- 6 That the instant appeal has been filed to pressurize the respondents to succumb to the illegal demands of the appellant.
- 7 That the appellant has been estopped by his own conduct to file the instant appeal.
- 8 That the appeal is not entertain able & maintainable.
- 9 That the appeal is bad for non joinder of necessary party who is Principal respondent and mis-joinder of unnecessary parties.
- 10 That the appellant has no cause of action against the answering respondents.
- 11 That the appellant is not competent to file the instant appeal against the respondents.

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Secretary,  
Elementary & Secondary Education  
Department Khyber Pakhtunkhwa.

Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar.

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

Service Appeal No.62/2012  
Gulab Khan

...Appellant.

VERSUS


Secretary to Govt: of Khyber Pakhtunkhwa, Elementary & Secondary Education Department  
& Others

...Respondents.

**REPLY ON BEHALF OF SECRETARY TO GOVERNMENT OF KHYBER  
PAKHTUNKHWA, FINANCE DEPARTMENT (RESPONDENT NO.3)**

**Respectfully Sheweth,**

Secretary to Government of Khyber Pakhtunkhwa Finance Department  
(Respondent No.3) do hereby relies on the Parawise Comments already filed in the  
Honourable Service Tribunal by Respondent No.1 & 2. The Parawise Comments  
of Respondent No.1 & 2 may be considered as reply of Respondent No.3  
(Secretary Finance) also.

  
Secretary to Govt: of Khyber Pakhtunkhwa  
Finance Department  
(Respondent No.3).

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

SERVICE APPEAL NO: 62/12

**Gulab Khan(Ex-SET) Head Master GHS Khankhel Mandozai, District Lakki**  
**Marwat. ....Appellant.**

**VERSUS**

1. Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa & others
2. Director Elementary & Secondary Education KPK Peshawar.
3. Secretary Finance Department Khyber Pakhtunkhwa.Peshawar.
4. Secretary Services Department, Khyber Pakhtunkhwa, Peshawar. ....Respondent

**PARAWISE COMMENTS ON BEHALF OF RESPONDING No; 1 to 3**

**Respectfully Sheweth :-**Respondent submitted as under:-

**PRELIMINARY OBJECTIONS.**

1. That the appeal is badly barred by time.
2. That the appellant has not come to this Hon! able court with clean hands.
3. That the appeal is not maintainable in its present form.
4. That the appellant has suppressed/concealed important material facts from this Hon! able court.
5. That the appellant has filed this appeal with malafide intentions.
6. That the instant appeal has been filed to pressurize the respondents to succumb to the illegal demands of the appellant.
7. That the appellant has been estopped by his own conduct to file the instant appeal.
8. That the appeal is not entertain able & maintainable.
9. That the appeal is bad for non joinder of necessary party who is Principal respondent and mis-joinder of unnecessary parties.
10. That the appellant has no cause of action against the answering respondents.
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**FACTS**

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In view of the above made submissions, it is requested that this Hon! able Tribunal may very graciously be placed to dismiss the instant appeal with cost in favor of the respondents Department.

Secretary,  
Elementary & Secondary Education  
Department Khyber Pakhtunkhwa.

Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar.



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

Service Appeal No. 62/2012

Gulab Khan ..... Appellant

VERSUS

Govt: of KPK & others..... RESPONDENTS

**APPLICATION FOR DELETION OF**  
**RESPONDENT NO. 04/ SECRETARY**  
**SERVICES, GOVT; OF KHYBER**  
**PAKHTUNKHWA, CIVIL SECRETARIAT,**  
**PESHAWAR.**

**Respectfully Sheweth;**

1. That the above noted Appeal is pending before this Honourable Court which has been fixed for today i.e. 18/12/2013.

2. That Secretary Services, Govt. of Khyber Pakhtunkhwa, Peshawar was made as Respondent No. 4 at the time of filing of above appeal, however, the said department has been closed down, therefore, needs to be deleted from the list of Respondents being unnecessary party.

It is, therefore, humbly prayed that on acceptance of this application, this Honourable Court may be pleased to delete the respondent No. 04 from the list of Respondents.

**Appellant**

Through

  
**Ghulam Nabi Khan**

Dated: 18/12/2013      Advocate Supreme Court

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

Service Appeal No.62/2012  
Gulab Khan

...Appellant.

**VERSUS**


Secretary to Govt: of Khyber Pakhtunkhwa, Elementary & Secondary Education Department  
& Others

...Respondents.

**REPLY ON BEHALF OF SECRETARY TO GOVERNMENT OF KHYBER  
PAKHTUNKHWA, FINANCE DEPARTMENT (RESPONDENT NO.3)**

**Respectfully Sheweth,**

Secretary to Government of Khyber Pakhtunkhwa Finance Department (Respondent No.3) do hereby relies on the Parawise Comments already filed in the Honourable Service Tribunal by Respondent No.1 & 2. The Parawise Comments of Respondent No.1 & 2 may be considered as reply of Respondent No.3 (Secretary Finance) also.

  
Secretary to Govt: of Khyber Pakhtunkhwa  
Finance Department  
(Respondent No.3).