

10.06.2022

Junior to counsel for the appellant present.

Lawyers are on general strike, therefore, case is adjourned. To come up for preliminary hearing on 31.07.2022 before S.B.


(Rozina Rehman)
Member (J)

01.08.2022


Nemo for appellant.

Notices be issued to appellant as well as his counsel for preliminary hearing on 17.10.2022 before S.B.


(Fareeha Paul)
Member (E)

17th Oct., 2022

Junior to counsel for the appellant present and seeks adjournment due to engagement of learned senior counsel for the appellant before Hon'ble Peshawar High Court. Last opportunity is granted. To come up for preliminary hearing on 21.11.2022 before S.B.


(Kalim Arshad Khan)
Chairman

Counsel was informed via telephonically for the date fixed 12/10/2022

24.11.2021

None for the appellant present.

Fresh notices be issued to the appellant and his counsel.
Adjourned. To come up for preliminary hearing on 27.01.2022
before S.B.



(MIAN MUHAMMAD)
MEMBER (E)

27.01.2022

None for the appellant present.

Notices be issued to the appellant and his counsel.
Adjourned. To come up for preliminary hearing on 29.03.2022
before S.B.




(Mian Muhammad)
Member(E)

29.03.2022

None for the appellant present.

As is evident from the previous order sheets, notices have
been issued to the appellant and his counsel repeatedly but the
case is not pursued in the court. Let last opportunity be granted
and a final notice be issued to the appellant and his counsel to
pursue the case and in case of failure, the instant service appeal
shall be dismissed in default. To come up for preliminary hearing
on 10.06.2022 before S.B.



(MIAN MUHAMMAD)
MEMBER(E)

28.01.2021

Appellant is present in person.

After making call initially and after waiting for interval once again call was made at 12:35 P.M, in response thereof appellant submitted that his counsel has received emergency call due to proceeding somewhere and is not available at the moment. Requested for adjournment. Adjourned to 06.05.2021 on which date file to come up for Preliminary hearing before S.B.

(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

06.05.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 24.08.2021 for the same as before.


Reader

24.08.2021

Nemo for the appellant. Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel and to come up for preliminary hearing before the S.B on 24.11.2021.

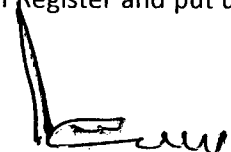

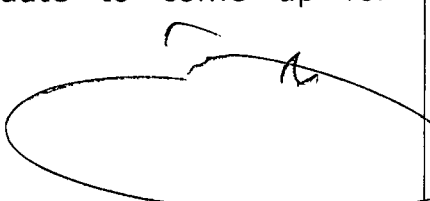

(SALAH-UD-DIN)
MEMBER (J)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 11402 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/09/2020	<p>The appeal of Mr. Hamayun Khan presented today by Syed Saud Shah Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>13/11/2020</u></p> <p style="text-align: right;"> CHAIRMAN</p>
13.11.2020		<p>Nemo for the appellant.</p> <p>Since the Members of the High Court as well as of the District Bar Associations, Peshawar, are observing strike today, therefore, learned counsel for appellant is not available today. Adjourned to 28.01.2021 on which date to come up for preliminary hearing before S.B.</p> <p style="text-align: right;"> (Muhammad Jamal Khan) Member (Judicial)</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. 11402/2020

Hamayun Khan.....(Appellant)

VERSUS

Secretary Elementary and Secondary Education Department,
Khyber Pakhtunkhwa and others.....(Respondents)

I N D E X

S.No.	Description of Documents	Annex	Pages
1.	Service Appeal		1-7
2.	Affidavit		8
3.	Addresses of the parties		9
4.	Copy of CNIC	A	10
5.	Copy of appointment is annexure "B"	B	11
6.	Copy of seniority list	C	12 to 14
7.	Copy of notification	D	15 to 17
8.	Copy of applications	E	18 to 24
9.	Copy of complaint	F	25 to 26
10.	Copy of findings	G	27 to 32
11.	Wakalat Nama		33

Appellant

Through

Dated: 21/07/2020


Syed Saud Shah

&

Akhunzada Asad Iqbal

Advocates High Court,
Peshawar.

Cell No. 0300-5945940

D

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. 11402/2020

Hamayun Khan S/o Jehanmir R/o Lui Shalman, Mohallah
Dorma Kor, Landi Kotal, Tehsil Landi Kotal, District
Khyber.....(Appellant)

VERSUS

1. Secretary Elementary and Secondary Education Department,
Khyber Pakhtunkhwa, Civil Secretariat Peshawar.
2. Director, Directorate of Elementary and Secondary
Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male), District Khyber at Jamrud.
4. Muhammad Yousaf S/o Abdul Aziz R/o Tribe Koki Khel,
Jamrud, Sher Khan Khel, District Khyber.....(Respondents)

Govt Middle School, Latiq Kali, Landi Kotal, District Khyber.

APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT
1974, AGAINST THE ILLEGAL,
VIOLATION OF SENIORITY LIST/ RULES
IN PROMOTION OF THEOLOGY TEACHER
(T.T) AND IMPUGNED ORDER OF
RESPONDENT NO. 3 DATED 12/10/2017
MAY PLEASE GRACIOUSLY BE
DECLARED NULL AND VOID, VOID-AB-
INITIO, BY THIS HON'BLE TRIBUNAL.

Respectfully Sheweth:

The appellant submits as under:

1. That the appellant is the law abiding citizen of Pakistan and bonafide resident of District Khyber. (Copy of CNIC is annexure "A").
2. That the appellant is serving as Theology Teacher (T.T.) under the control and supervision of respondent No. 1, 2 and 3 in District Khyber since 02/10/1994 and has never been posted on any another post since appointment. (Copy of appointment is annexure "B").
3. That due to the length of service and being senior in age, the appellant is the most senior than the respondent No. 4, but vide impugned seniority list of Theology Teacher (T.T) Male, District Khyber, issued by respondent No. 3, the appellant has been shown at Serial No. 91, while respondent No. 4, is at Serial No. 72. (Copy of seniority list is attached as annexure "C").

3

4. That vide impugned notification/ placement No. 15113/-60 dated 11/10/2017, issued by respondent No. 3, promoted respondent No. 4 from Theology Teacher (T.T) to the post of S.S.T (Theology) instead of appellant which is illegal and unlawful, because respondent No. 4, is junior than the appellant. (Copy of notification is annexure "D").

5. That the appellant moved several applications against the illegal, unlawful seniority list and impugned order/ notification of promotion of respondent No. 4 dated 11/10/2017, to the respondent department but in vain. (Copy of applications is annexure "E").

6. That later on the appellant instituted a complaint before the Provincial Ombudsman Secretariat K.P dated 27/05/2019 stating that he was recruited as Theology Teacher (T.T) w.e.f 02/10/1994 and as per seniority list he was most senior amongst the Theology Teacher (T.T), but was ignored from promotion to the post of S.S.T (General) and another junior T.T., namely Muhammad Yousaf respondent No. 4, was promoted to the post of S.S.T (General),

(4)

by D.E.O District Khyber (Male) and he has requested to peruse the record and A.C.Rs of both teachers to determine who was most deserving for promotion. (Copy of complaint is attached as annexure "F").

7. That the Provincial Ombudsman issued notices under Section 10 (4) of the Khyber Pakhtunkhwa Provincial Ombudsman Act 2010, to the respondents to meet the allegations and submit reply including rebuttel if any and respondent No. 3, submitted reply.
8. That after hearing the Provincial Ombudsman Secretariat K.P.K issued their findings as "The Complainant's B.E.D degree may be sent to the H.E.C, for re-verification in the light of the judgment of Apex Court referred to above and if it is verified by H.E.C, the complainant may be considered for promotion to S.S.T, post from the date his junior was promoted. After receipt of verified B.E.D Degree, D.E.O Bara may convene the D.P.C meeting within one week to consider the case of promotion of complainant from the date of his junior was

5

promoted to protect the legal rights of the complainant under intimation to this forum vide dated 05/12/2019, and after ombudsman decision/ findings, the respondents department issued revised and corrected seniority list for the promotion of T.T. to S.S.t, but respondents not complied with the above findings till date. (Copy of findings are attached as annexure "G").

9. That, appellant being feeling highly aggrieved, approaches this Hon'ble Tribunal on the following grounds amongst others:

GROUND:

- A. That the illegal seniority list and impugned order/ notification of promotion dated 11/10/2017 of respondent No. 3 is against the law and rules of seniority of the Government Servants, void, ineffective upon the rights of the appellant and against the principle of natural justice, hence liable to be set aside.
- B. That the promotion of respondent No. 4 by the respondent No. 3 is based on malafide and clear

②

violation of service laws and the result of PICK and Choose and favoritism on part of official respondents.

- C. That the appellant being senior from respondent No. 4 in respect of age but respondent No. 3 totally ignored this fact, rules and regulations, thus violated the rights of appellant.
- D. That the appellant being senior in age, is eligible candidate and fit for promotion from T.T. (male) to (SST), according to rules and regulations of service laws, but the illegal promotion of respondent No. 4 by respondent No. 3, clearly shows the biased approach of the respondent department.
- E. That the act of respondents No. 1 to 3 are not only discriminatory, but also violation of Article 25 of the Constitution of Islamic Republic of Pakistan, 1973.
- F. That, even otherwise, the promotion of senior most on any basis will not harass anyone, but promotion of junior on any basis/ colour/ grab is certainly speaking of foul play.

7

G. That any other ground would be raised at the time of arguments with prior permission of this Hon'ble Court.

It is, therefore, most humbly prayed that on acceptance of the instant appeal, the illegal seniority list of T.T. (Male) and impugned order/ notification of the respondent No. 3 dated 11/10/2017 may kindly be declared null and void, against the law, constitution, without jurisdiction and respondents No. 1 to 3 be directed to promote the appellant from Theology Teacher to S.S.T. from the date of his junior was promoted (Theology), being senior in age and eligible candidate for promotion immediately along with back benefits.

Any other relief which this Hon'ble Court deems appropriate though not specifically asked, may also be granted.


Appellant

Through


Syed Saud Shah

Dated: 21/07/2020

&
Akhunzada Asad Iqbal
Advocates High Court,
Peshawar.

2

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. _____/2020

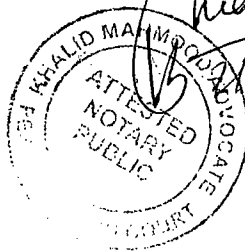
Hamayun Khan.....(Appellant)

VERSUS

Secretary Elementary and Secondary Education Department,
Khyber Pakhtunkhwa and others.....(Respondents)

AFFIDAVIT

I, Hamayun Khan S/o Jehanmir R/o Lui Shalman,
Mohallah Dorma Kor, Landi Kotal, Tehsil Landi Kotal, District
Khyber, 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.



DEPONENT

9

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. _____/2020

Hamayun Khan.....(Appellant)

VERSUS

Secretary Elementary and Secondary Education Department,
Khyber Pakhtunkhwa and others.....(Respondents)


ADDRESSES OF THE PARTIES

PETITIONER:

Hamayun Khan S/o Jehanmir R/o Lui Shalman, Mohallah
Dorma Kor, Landi Kotal, Tehsil Landi Kotal, District Khyber.

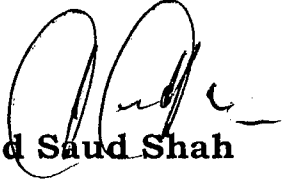
RESPONDENTS:

1. Secretary Elementary and Secondary Education Department,
Khyber Pakhtunkhwa, Civil Secretariat Peshawar.
2. Director, Directorate of Elementary and Secondary
Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male), District Khyber at Jamrud.
4. Muhammad Yousaf S/o Abdul Aziz R/o Tribe Koki Khel,
Jamrud, Sher Khan Khel, District Khyber.


Appellant

Through

Dated: 21/07/2020


Syed Saud Shah

&
Akhunzada Asad Iqbal
Advocates High Court,
Peshawar.

A

حکومت پاکستان
 پولیس سٹیشن لاہور
 21203-4826133-3
 لاہور
 علی احمد خان
 تاریخ: 02/03/1970
 سید رشید احمد

YG3W6T : 21203-4826133-3
 لاہور
 14070171862
 30/06/2020 : 09/07/2020
 لاہور

Handwritten signature and stamp.

(C)

(12)

CONSOLIDATED SENIORITY LIST OF TT MALE TEACHERS IN KHYBER AGENCY															
S.No	SENIORITY No	Name	F/Name	Qualification		Designation	SPS No	D/O Birth	Domicile	D/O Ist Entry into Govt Service	D/O App: in the Present Post	Place of Posting	D/O Passing of Prof: Exam result	Consideration Date	Remarks
				Acad :	Prof :										
1	1	Ifrikhar Ullah	Mohammad Yousaf	BA	Sanad	TT	15	16/10/1955	Mardan	14/12/1976	14/12/1976	GPS Haji Dhand	14/12/1976	14/12/1976	
2	2	Moeen Khan	Asaf Khan	FA	Sanad	TT	15	08/05/1960	Khyber	30/04/1978	30/04/1978	GPS Asif Kili	30/04/1978	30/04/1978	
3	3	Ghulam Nabi	Fazal Khan	MA	Sanad	TT	15	05/01/1958	Khyber	31/12/1980	31/12/1980	GPS Tandi	31/12/1980	31/12/1980	
4	4	Istarahat	khitabshah	FA	sanad	TT	15	26/01/1963	Khyber	22/01/1983	22/01/1983	GPS Khan Akber	22/01/1983	22/01/1983	
5	5	Fazal Ahmad	Muhammad Saeed	FA	sanad	TT	15	20/01/1958	Peshawar	12/10/1983	12/10/1983	GPS Prang Kili	12/10/1983	12/10/1983	
6	6	Said Rehman Shah	syed Bahadar shah	FA	sanad	TT	15	07/02/1960	Peshawar	12/10/1983	12/10/1983	GPS Gujjar dhand	12/10/1983	12/10/1983	
7	7	Bashir Ud Din	shabirkhan	FA	sanad	TT	15	12/10/1959	Chitral	15/10/1983	15/10/1983	GPS Shodani	15/10/1983	15/10/1983	
8	8	Abdul Bari	Abdul Latif	FA	sanad	TT	15	13/11/1959	Swat	01/11/1983	01/11/1983	GPS Jalal Din No 7	01/11/1983	01/11/1983	
9	9	Fazal Haq	Hazrat gul	SSc	sanad	TT	15	21/01/1960	Peshawar	17/12/1984	17/12/1984	GPS Sardar Kili	17/12/1984	17/12/1984	
10	10	Fazal Haq	sabe Haq	SSc	sanad	TT	15	02/03/1962	Khyber	26/12/1984	26/12/1984	GPS Halm Kili	26/12/1984	26/12/1984	
11	11	Muhammad Shafiq	Abdul Hayee	FA	sanad	TT	15	21/05/1958	Peshawar	26/12/1984	26/12/1984	GHS Illamguder	26/12/1984	26/12/1984	
12	12	Khanzad Gul	Said Rasool	FA	Sanad	TT	15	01/01/1960	Bajour	30/12/1984	30/12/1984	GPS Kamar Khel	30/12/1984	30/12/1984	
13	13	Mohd: Islam	Seendamai	Middle	Sanad	TT	15	05/11/1962	Bajour	03/08/1985	03/08/1985	GHS Jaffer Khan	03/08/1985	03/08/1985	
14	14	Farooq Jan	Abdur Rehman	FA	Sanad	TT	15	03/09/1958	Khyber	03/09/1985	03/09/1985	GPS Talib Jan	03/09/1985	03/09/1985	
15	15	Abdul Aziz	Mewa Khan	FA	Sanad	TT	15	07/09/1960	Khyber	03/09/1985	03/09/1985	GPS Mandy Kesi	03/09/1985	03/09/1985	
16	16	Hamid Shah	Toti Shah	FA	Sanad	TT	15	29/01/1958	Khyber	19/01/1980	19/01/1980	GPS Narsi Khel	12/09/1985	12/09/1985	
17	17	Mohammad Yaseen	Noora Jan	FA	Sanad	TT	15	01/12/1961	Khyber	27/11/1985	27/11/1985	GPS Juma Bar	27/11/1985	27/11/1985	
18	18	Syed Gul Badshah	Syed Gulab Shah	FA	Sanad	TT	15	07/09/1962	Peshawar	01/03/1986	01/03/1986	GMS Abdul Totif Kili	01/03/1986	01/03/1986	
19	19	Mohammad Ghani	Mohammad Sharif	FA	Sanad	TT	15	26/05/1962	Charsadda	24/05/1986	24/05/1986	GPS Karna Khel	24/05/1986	24/05/1986	
20	20	Mustaqeem Khan	Khan Sharif	FA	Sanad	TT	15	15/06/1966	Khyber	16/06/1986	16/06/1986	GPS Peero Khan	16/06/1986	16/06/1986	
21	21	Imtiaz Shah	Mahmood Shah	FA	Sanad	TT	15	02/08/1967	Peshawar	18/01/1987	18/01/1987	GPS Badraga No 2	18/01/1987	18/01/1987	
22	22	Gul Muhammad	Jan Muhammad	FA	sanad	TT	15	04/10/1961	D.I Khan	30/09/1987	30/09/1987	GHS Jaffer Shah	30/09/1987	30/09/1987	
23	23	Muhammad Ali	Rahim Ullah	SSC	Sanad	TT	15	05/05/1958	Malakand	01/10/1987	01/10/1987	GHS Kharghali	01/10/1987	01/10/1987	
24	24	Murtaza Khan	Bara Khan	Middle	Sanad	TT	15	18/04/1963	Khyber	14/04/1988	14/04/1988	GHS Mawaz	14/04/1988	14/04/1988	
25	25	Sabaz Ali	Said Badshah	FA	Sanad	TT	15	10/10/1961	Khyber	05/10/1989	05/10/1989	GPS Spiti Qaber No. 10	05/10/1989	05/10/1989	
26	26	Abdul satar	Abdul Gaffar	FA	sanad	TT	15	01/03/1964	Khyber	05/10/1989	05/10/1989	GPS Murad Dhand	05/10/1989	05/10/1989	
27	27	Faizullah	Umera Khan	FA	Sanad	TT	15	08/10/1964	Khyber	05/10/1989	05/10/1989	GPS Parahy dhand	05/10/1989	05/10/1989	
28	28	Mohammad Jamil	Badar Khan	FA	Sanad	TT	15	08/10/1967	Khyber	05/10/1989	05/10/1989	GPS Neor Anel	05/10/1989	05/10/1989	
29	29	Abdur Rehman	Abdul Qadar	FA	Sanad	TT	15	08/10/1961	Khyber	05/10/1989	05/10/1989	GPS Badshah dhand	05/10/1989	05/10/1989	
30	30	Imdad Ullah	Abdul Ghani	BA	Sanad	TT	15	08/10/1964	Khyber	05/10/1989	05/10/1989	GPS Sh. F. dhand	05/10/1989	05/10/1989	
31	31	Naeem Ullah	Abdul Mateen	SSC	Sanad	TT	15	25/04/1971	Khyber	05/10/1989	05/10/1989	GPS Khadda dhand	05/10/1989	05/10/1989	
32	32	Momin Khan	Yar Zada	SCC	Sanad	TT	15	18/05/1959	Khyber	07/10/1989	07/10/1989	GPS Spiti B. dhand	07/10/1989	07/10/1989	
33	33	Ubaid ur Rehman	Mohib Ullah	FA	Sanad	TT	15	22/02/1976	Khyber	02/11/1989	02/11/1989	GPS P. dhand	02/11/1989	02/11/1989	

سابقہ ڈی او صاحب محمد صدیق کے دوران یہ غلط سناریاں لکھی گئی ہیں اور ان کو درست کیا گیا ہے اور
 درست فرسٹ اپریل 1996-10-02 کے بعد صرف 01-01-1999 تک کی اور پھر ان کو درست کیا گیا ہے اور
 اور جو اس وقت تک درست نہیں کیا گیا ہے۔

12

No	Name	Grade	Post	Age	Religion	Marital Status	Education	Service	Remarks
80	Hasan Ali	SSC	Sanad	17	Muslim	Married	10/10/1993	10/10/1993	
81	Hasan Ali	SSC	Sanad	17	Muslim	Married	10/10/1993	10/10/1993	
82	Hasan Ali	SSC	Sanad	17	Muslim	Married	10/10/1993	10/10/1993	
83	Hasan Ali	SSC	Sanad	17	Muslim	Married	10/10/1993	10/10/1993	
84	Hasan Ali	SSC	Sanad	17	Muslim	Married	10/10/1993	10/10/1993	
85	Hasan Ali	SSC	Sanad	17	Muslim	Married	10/10/1993	10/10/1993	
86	Hasan Ali	SSC	Sanad	17	Muslim	Married	10/10/1993	10/10/1993	
87	Hasan Ali	SSC	Sanad	17	Muslim	Married	10/10/1993	10/10/1993	
88	Hasan Ali	SSC	Sanad	17	Muslim	Married	10/10/1993	10/10/1993	
89	Hasan Ali	SSC	Sanad	17	Muslim	Married	10/10/1993	10/10/1993	
90	Hasan Ali	SSC	Sanad	17	Muslim	Married	10/10/1993	10/10/1993	
91	Hasan Ali	SSC	Sanad	17	Muslim	Married	10/10/1993	10/10/1993	
92	Hasan Ali	SSC	Sanad	17	Muslim	Married	10/10/1993	10/10/1993	
93	Hasan Ali	SSC	Sanad	17	Muslim	Married	10/10/1993	10/10/1993	
94	Hasan Ali	SSC	Sanad	17	Muslim	Married	10/10/1993	10/10/1993	
95	Hasan Ali	SSC	Sanad	17	Muslim	Married	10/10/1993	10/10/1993	
96	Hasan Ali	SSC	Sanad	17	Muslim	Married	10/10/1993	10/10/1993	
97	Hasan Ali	SSC	Sanad	17	Muslim	Married	10/10/1993	10/10/1993	
98	Hasan Ali	SSC	Sanad	17	Muslim	Married	10/10/1993	10/10/1993	
99	Hasan Ali	SSC	Sanad	17	Muslim	Married	10/10/1993	10/10/1993	

Better copy of page-12,13,14

CONSOLIDATED SENIORITY LIST OF TT MALE TEACHERS IN KHYBER AGENCY

AGENCY EDUCATION OFFICE KHYBER AGENCY

S.#	Seni ority No	Name	F/ Name	Qualification		Desig nation	BPS No	D.O.B	Domicile	D/o 1 st Entry into Govt Service	D/O App: in the present Post	Place of posting	D/O passing of Prof: Exam result	Considerati on Date	Remar ks
				Acad:	Prof:										
1.	1	Iftikhar Ullah	M Yousaf	BA	Sanad	TT	15	16.10.1955	Mardan	14.12.1976	14.12.1976	GPS Haji Dhand	14.12.1976	14.12.1976	
2.	2	Moeen Khan	Asaf Khan	FA	Sanad	TT	15	08.05.1960	Khyber	30.04.1978	30.04.1978	GPS Asif Killi	30.04.1978	30.04.1978	
3.	3	Ghulam Nabi	Fazal Khan	MA	Sanad	TT	15	05.01.1958	Khyber	31.12.1980	31.12.1980	GPS Tandi	31.12.1980	31.12.1980	
4.	4	Istarahat	Khitabshah	FA	Sanad	TT	15	26.01.1963	Khyber	22.01.1983	22.01.1983	GPS Khan Akbar	22.01.1983	22.01.1983	
5.	5	Fazal Ahmad	M Saeed	FA	Sanad	TT	15	20.01.1958	Peshawar	12.10.1983	12.10.1983	GPS Pran Killi	12.10.1983	12.10.1983	
6.	6	S Rehman Shah	S bahadar Shah	FA	S/ Almia	TT	15	07.02.1960	Peshawar	12.10.1983	12.10.1983	GPS Gujar Dhand	12.10.1983	12.10.1983	
7.	7	Bashir ud Din	Shabir Khan	FA	Sanad	TT	15	12.10.1959	Chitral	15.10.1983	15.10.1983	GPS Shodant	15.10.1983	15.10.1983	
8.	8	Abdul Bari	Abdul Latif	FA	Sanad	TT	15	13.11.1959	Swat	01.11.1983	01.11.1983	GPS jala Din No.2	01.11.1983	01.11.1983	
9.	9	Fazal Mabood	Hazrat Gul	SSC	Sanad	TT	15	21.01.1960	Peshawar	17.12.1984	17.12.1984	GPS SardarKili	17.12.1984	17.12.1984	
10.	10	Fazal Haq	Sabe Haq	SSC	Sanad	TT	15	02.03.1962	Khyber	26.12.1984	26.12.1984	GPS Halim Killi	26.12.1984	26.12.1984	
11.	11	M Shafiq	Abdul Hayee	FA	Sanad	TT	15	21.08.1958	Peshawar	26.12.1984	26.12.1984	GHS Ilamgudar	26.12.1984	26.12.1984	
12.	12	Khanzad Gul	Said Rasool	FA	Sanad	TT	15	01.01.1960	Bajaour	30.12.1984	30.12.1984	GPS kamar Khel	30.12.1984	30.12.1984	
13.	13	Mohd Islam	Seendamal	Middle	Sanad	TT	15	05.11.1962	Bajaour	03.08.1985	03.08.1985	GJS Jafer Khan	03.08.1985	03.08.1985	
14.	14	Farooq Jan	Abdur Rehman		Sanad	TT	15	03.09.1958	Khyber	03.09.1985	03.09.1985	GPS Talib Jan	03.09.1985	03.09.1985	
15.	15	Abdul Aziz	Mewa Khan	FA	Sanad	TT	15	07.09.1960	Khyber	03.09.1985	03.09.1985	GPS Manday Kass	03.09.1985	03.09.1985	
16.	16	Hamid Shah	Toti Shah	FA	Sanad	TT	15	29.01.1958	Khyber	19.01.1980	19.01.1980	GPS Mesri Khel	19.01.1980	19.01.1980	
17.	17	M Yaseen	Noora Jan	FA	Sanad	TT	15	01.12.1961	Khyber	27.11.1985	27.11.1985	GPS Juma Baz	27.11.1985	27.11.1985	
18.	18	S Gul Badshah	Syed Gulab Shah	FA	Sanad	TT	15	02.09.1962	Peshawar	01.03.1986	01.03.1986	GMS Abdul Latif kili	01.03.1986	01.03.1986	
19.	19	M Ghani	M Sharif	FA	Sanad	TT	15	26.05.1962	Charsadda	24.05.1986	24.05.1986	GPS Karna Khel	24.05.1986	24.05.1986	
20.	20	Mustaqeem Khan	Khan Sharif	FA	Sanad	TT	15	16.06.1966	Khyber	16.06.1986	16.06.1986	GPS peero Khan	16.06.1986	16.06.1986	
21.	21	Imtiaz Shah	Mahmood Shah	FA	Sanad	TT	15	02.08.1967	Peshawar	18.01.1987	18.01.1987	GPS Badraga No.2	18.01.1987	18.01.1987	
22.	22	Gul M	Jan M	FA	Sanad	TT	15	04.10.1961	D.I Khan	30.09.1987	30.09.1987	GHS jaffar Shah	30.09.1987	30.09.1987	
23.	23	M Ali	Rahim Ullah	SSC	Sanad	TT	15	05.05.1958	Malakand	01.10.1987	01.10.1987	GHS Karghali	01.10.1987	01.10.1987	
24.	24	Murtaza Khan	Bara Khan	Middle	Sanad	TT	15	18.04.1963	Khyber	14.04.1988	14.04.1988	GHS Mawaz	14.04.1988	14.04.1988	
25.	25	Sabaz Ali	Said Badshah	FA	Sanad	TT	15	10.10.1961	Khyber	05.10.1989	05.10.1989	GPS Spin Qabar No.1	05.10.1989	05.10.1989	
26.	26	Abdul Sattar	Adbul Gaffar	FA	Sanad	TT	15	01.03.1964	Khyber	05.10.1989	05.10.1989	GPS Murad Dhand	05.10.1989	05.10.1989	
27.	27	Faizullah	Umera Khan	FA	Sanad	TT	15	08.10.1964	Khyber	05.10.1989	05.10.1989	GPS Parang dera	05.10.1989	05.10.1989	
28.	28	M Jamil	Badar Khan	FA	Sanad	TT	15	08.10.1967	Khyber	05.10.1989	05.10.1989	GPS Noor Khel	05.10.1989	05.10.1989	
29.	29	Abdur Rehman	Abdul Qadar	FA	Sanad	TT	15	08.10.1961	Khyber	05.10.1989	05.10.1989	GPS Badsha	05.10.1989	05.10.1989	
30.	30	Imdad Ullah	Abdul Ghani	BA	Sanad	TT	15	08.10.1964	Khyber	05.10.1989	05.10.1989	GPS Shahzaman	05.10.1989	05.10.1989	
31.	31	Naeem Ullah	Abdul Mateen	SSC	Sanad	TT	15	25.04.1972	Khyber	05.10.1989	05.10.1989	GPS Mirdad Khan	05.10.1989	05.10.1989	
32.	32	Momin Khan	Yar Zada	SSC	Sanad	TT	15	18.05.1159	Khyber	07.10.1989	07.10.1989	GPS Sam Baba	07.10.1989	07.10.1989	
33.	33	Ubaid ur Rehman	Mohib Ullah	FA	Sanad	TT	15	22.02.1970	Swabi	08.11.1989	08.11.1989	GPS Parang Dera	08.11.1989	08.11.1989	

CONSOLIDATED SENIORITY LIST OF TT MALE TEACHERS IN KHYBER AGENCY
AGENCY EDUCATION OFFICE KHYBER AGENCY

S.#	Seni orit y No	Name	F/ Name	Qualification		Desig natio n	BPS No	D.O.B	Domicile	D/o 1 st Entry into Govt Service	D/O App: in the present Post	Place of posting	D/O passing of Prof: Exam result	Considerati on Date	Remar ks
				Acad:	Prof:										
34.	34	Said Akram	Khaista Khan	FA	Sanad	TT	15	10.02.1968	Khyber	14.12.1989	14.12.1989	GPS Ashraf Kali	14.12.1989	14.12.1989	
35.	35	Mahboobur Rahman	Hidayat ur Rahman	SSC	Sanad	TT	15	20.01.1968	Peshawar	20.01.1990	20.01.1990	GMS Azam Kalay	20.01.1990	20.01.1990	
36.	36	Gul Nawaz	Shera Gul	SSC	Sanad	TT	15	07.08.1971	Khyber	07.02.1990	07.02.1990	GPS Kaga Ghara	07.02.1990	07.02.1990	
37.	37	Tasneemullah	Doa Jan	FA	Sanad	TT	15	02.04.1971	Peshawar	11.03.1990	11.03.1990	GPS Zabit Noor	11.03.1990	11.03.1990	
38.	38	Abdul Zanir	Badshah Mir	BA	Sanad	TT	15	01.10.1969	Khyber	14.11.1990	14.11.1990	GMS Zewa	14.11.1990	14.11.1990	
39.	39	Abdul Wahab	Muzammil Shah	FA	Sanad	TT	15	01.12.1966	Khyber	14.11.1990	14.11.1990	GMS Sama Ghara	14.11.1990	14.11.1990	
40.	40	Ghulam Din	Zaiwar Shah	FA	Denyat	TT	15	27.11.1962	Khyber	14.11.1990	14.11.1990	GPS Alam Sher	14.11.1990	14.11.1990	
41.	41	Hunar Shah	Sharbat Shah	Middle	Sanad	TT	15	02.06.1967	Khyber	14.11.1990	14.11.1990	GPS Spenaky	14.11.1990	14.11.1990	
42.	42	Abdul Zamir	Badshah Mir	BA	Hafiz	TT	15	01.10.1969	Khyber	14.11.1990	14.11.1990	GMS Zawa	14.11.1990	14.11.1990	
43.	43	Abdul Wahab	M Shah	FA	Sanad	TT	15	01.12.1966	Khyber	14.11.1990	14.11.1990	GMS Sama Ghara	14.11.1990	14.11.1990	
44.	44	Maqsood Khan	Wazir Akbar	FA	Sanad	TT	15	17.11.1968	Khyber	14.11.1990	14.11.1990	GPS Jamal Khel	14.11.1990	14.11.1990	
45.	45	Mukaram Khan	Mura Gul	SSC	Sanad	TT	15	18.05.1972	Khyber	14.11.1990	14.11.1990	GPS Wazir Kor	14.11.1990	14.11.1990	
46.	46	Zahid Ullah	Mati Ullah	SSC	Sanad	TT	15	03.02.1966	Charsadda	28.02.1991	28.02.1991	GHS Shaga	28.02.1991	28.02.1991	
47.	47	Munawar Shah	Azmat Khan	FA	T.T	TT	15	22.09.1969	Khyber	14.04.1992	14.04.1992	GPS Shera Khan	14.04.1992	14.04.1992	
48.	48	M. Saeed	Izzat Khan	SSC	Sanad	TT	15	14.02.1969	Khyber	14.04.1992	14.04.1992	GPS Shera Khan	14.04.1992	14.04.1992	
49.	49	Amanat Khan	Wazir Bagh	FA	Sanad	TT	15	07.04.1970	Khyber	14.04.1992	14.04.1992	GPS Shin Grang	14.04.1992	14.04.1992	
50.	50	Abdul Hameed	Mohib Ullah	FA	Sanad	TT	15	19.04.1968	Khyber	14.04.1992	14.04.1992	GMS Zawa	14.04.1992	14.04.1992	
51.	51	Khumar ud Din	Shad Muhammad	FA	Sanad	TT	15	15.04.1967	Khyber	14.04.1992	14.04.1992	GPS Pasid Khel	14.04.1992	14.04.1992	
52.	52	Abdul Malik	Khair Gulab	FA	Sanad	TT	15	24.04.1962	Khyber	15.04.1992	15.04.1992	GHS MadGah Atari	15.04.1992	15.04.1992	
53.	53	Lali Jan	Shah Zamir	SSC	Sanad	TT	15	10.10.1970	Khyber	14.04.1992	14.04.1992	GPS sama Ghara	14.04.1992	14.04.1992	
54.	54	Abdus Satar	Gul Baz	FA	Sanad	TT	15	03.03.1974	Khyber	18.04.1992	18.04.1992	GPS M Shah	18.04.1992	18.04.1992	
55.	55	Arif Shah	Gul Shah	FA	Sanad	TT	15	04.04.1971	Khyber	18.04.1992	18.04.1992	GPS Wali Baba	18.04.1992	18.04.1992	
56.	56	Ihsan ul Hamid	Mohib Ullah	SSC	Sanad	TT	15	05.11.1971	Khyber	14.04.1992	14.04.1992	GPS Yara Jan Kalay	14.04.1992	14.04.1992	
57.	57	Nasir Ud Din	Ghulam Ali	FA	Sanad	TT	15	20.08.1972	Khyber	17.02.1993	17.02.1993	GHS Madgali Atari	17.02.1993	17.02.1993	
58.	58	Niaz Badin	Abdul Nabi	SSC	Sanad	TT	15	05.12.1972	Khyber	17.02.1993	17.02.1993	GPS Sam Baba	17.02.1993	17.02.1993	
59.	59	M Nawaz	Shakeel Jan	SSC	Sanad	TT	15	06.50.1971	Khyber	17.02.1993	17.02.1993	GPS Spin Qabar	17.02.1993	17.02.1993	
60.	60	Khial Muhammad	Muhabbat Khan	SSC	Sanad	TT	15	25.03.1975	Khyber	17.02.1993	17.02.1993	GPS Khadim Khalay	17.02.1993	17.02.1993	
61.	61	Rahat Baig	Rabeg	FA	Sanad	TT	15	30.03.1975	Khyber	17.02.1993	17.02.1993	GPS Badraga No.1	17.02.1993	17.02.1993	
62.	62	Mujeeb ur Rahman	Khilil Ur Rahman	FA	Sanad	TT	15	11.02.1970	Khyber	17.02.1993	17.02.1993	GPS Lowy Shalman No.2	17.02.1993	17.02.1993	
63.	63	Rahmat Ullah	M Sadeeq	SSC	Sanad	TT	15	10.01.1971	Khyber	17.02.1993	17.02.1993	GMS Ghagra	17.02.1993	17.02.1993	
64.	64	Abdul Karim	A Qadir	FA	Sanad	TT	15	17.02.1965	Khyber	17.02.1993	17.02.1993	GPS Char Bacgh	17.02.1993	17.02.1993	
65.	65	Asif Khan	Sharif Khan	FA	Sanad	TT	15	01.12.1974	Khyber	23.02.1993	23.02.1993	GPS Sur Qamar	23.02.1993	23.02.1993	
66.	66	Asif Khan	Sharif Khan	FA	Sanad	TT	15	01.12.1974	Khyber	23.02.1993	23.02.1993	GPS Sur Qamar	23.02.1993	23.02.1993	

CONSOLIDATED SENIORITY LIST OF TT MALE TEACHERS IN KHYBER AGENCY
AGENCY EDUCATION OFFICE KHYBER AGENCY

S.#	Seni orit y No	Name	F/ Name	Qualification		Desig natio n	BPS No	D.O.B	Domicile	D/o 1 st Entry into Govt Service	D/O App: in the present Post	Place of posting	D/O passing of Prof: Exam result	Considerati on Date	Remar ks
				Acad:	Prof:										
67.	67	Hafiz Zahidan	Badshah Zaman	FA	Sanad	TT	15	01.11.1962	Bannu	30.03.1993	30.03.1993	GPS Faizoo	30.03.1993	30.03.1993	
68.	68	Rahman ud Din	Sardar Khan	FA	s/alamia	TT	15	02.01.1968	Khyber	02.04.1994	02.04.1994	GPS Sur Qamar	02.04.1994	02.04.1994	
69.	69	Izhar Ullah	Laiq Khan	BA	Sanad	TT	15	10.04.1973	Khyber	02.04.1994	02.04.1994	GHS Hashim abad	02.04.1994	02.04.1994	
70.	70	Shams ul Islam	Khan Gul	FA	Sanad	TT	15	02.01.1974	Khyber	02.10.1994	02.10.1994	GPS Allah Dand	02.10.1994	02.10.1994	
71.	71	Abdur Rahman	Mobarik shah	SSC	Alia	TT	15	05.10.1969	Khyber	02.10.1994	02.10.1994	GHSS Spin Dand	02.10.1994	02.10.1994	
72.	72	Muhammad Yousaf	Abdul Aziz	BA	Sanad/ B.ed	TT	15	05.04.1974	Khyber	02.10.1994	02.10.1994	GPS Warmando	02.10.1994	02.10.1994	
73.	73	Rooh ul Amin	Khitab Gul	FA	Alia	TT	15	20.04.1968	Khyber	02.10.1994	02.10.1994	GPS Warmando	02.10.1994	02.10.1994	
74.	74	Daolat Khan	Zilla Noor	FA	Sanad	TT	15	05.06.1973	Khyber	10.10.1994	10.10.1994	GHS Jan Khan Kalay	10.10.1994	10.10.1994	
75.	75	Qazi Rahman	Amin Shah	Middle	Sanad	TT	15	25.05.1975	Khyber	10.10.1994	10.10.1994	GPS Sara Ghari	10.10.1994	10.10.1994	
76.	76	Bakhtiar Jan	Shah Zamir	FA	Sanad	TT	15	15.10.1969	Khyber	10.10.1994	10.10.1994	GPS Sultan Khel	10.10.1994	10.10.1994	
77.	77	Dolat Khan	Zilla Noor	FA	Hafiz	TT	15	05.06.1973	Khyber	10.10.1994	10.10.1994	GHS Jan Khan Kalay	10.10.1994	10.10.1994	
78.	78	Rasool Jan	Ahmad Khan	SSC	Sanad	TT	15	06.07.1970	Khyber	10.10.1994	10.10.1994	GPS Chora No.2	10.10.1994	10.10.1994	
79.	79	Ghani Shah	Khilil Shah	Sanad	T.T	TT	15	25.12.1966	Khyber	07.10.1994	07.10.1994	GPS Sur Qas	07.10.1994	07.10.1994	
80.	80	M Ibrahim	Amin Khan	SSC	Sanad	TT	15	19.03.1975	Khyber	03.11.1994	03.11.1994	GHS Madgah	03.11.1994	03.11.1994	
81.	81	Pasa Khan	Alif Khan	BA	Sanad	TT	15	01.03.1973	Khyber	16.01.1995	16.01.1995	GPS Khurma Tang	16.01.1995	16.01.1995	
82.	82	Naseeb Khan	Majan Khan	FA	Sanad	TT	15	15.11.1968	Khyber	22.04.1993	22.04.1993	GPS Meri Khel	22.04.1993	22.04.1993	
83.	83	Jumar Zar	Pio Zar	Middle	Sanad	TT	15	20.04.1976	Khyber	23.10.1995	23.10.1995	GPS Yar Zamad	23.10.1995	23.10.1995	
84.	84	Faridullah	Sham Ali	FA	Sanad	TT	15	02.01.1971	Khyber	23.10.1995	23.10.1995	GPS Kami Shalman	23.10.1995	23.10.1995	
85.	85	Atiqur Rahman	Abdul Ghafar	FA	Sanad	TT	15	10.03.1975	Khyber	23.10.1995	23.10.1995	GMS Kambila	23.10.1995	23.10.1995	
86.	86	Abdur Raheem	Shanay	SSC	Sanad	TT	15	01.10.1973	Khyber	19.12.1995	19.12.1995	GHS Jan Khan Kalay	19.12.1995	19.12.1995	
87.	87	M Jan	Fawlad Khan	SSC	Sanad	TT	15	06.01.1970	Khyber	19.12.1995	19.12.1995	GHS Hissara	19.12.1995	19.12.1995	
88.	88	Najmudin	Darwaish	SSC	Sanad	TT	15	02.01.1975	Khyber	02.01.1996	02.01.1996	GHS Khar Ghali	02.01.1996	02.01.1996	
89.	89	Muhammada Jan	Mehar Rahman	SSC	Alia Almia	TT	15	15.08.1972	Peshawar	23.06.1997	23.06.1997	GHS Zintara	23.06.1997	23.06.1997	
90.	90	Mohib Ullah Shah	Syed Shakhi Shah	FA	S/ Alamia	TT	15	01.07.1966	Khyber	05.02.1986	05.02.1986	GMS Jawar Mena	05.02.1986	05.02.1986	
91.	91	Hamayoun Khan	Jahan Mir	MA	Almia/ B.ed	STT	16	02.03.1970	Khyber	02.10.1994	01.01.1999	GHS Durma Kor	01.01.1999	01.01.1999	
92.	92	Arshad Khan	Khadi Khan	SSC	PTC	TT	15	29.03.1973	Khyber	05.04.1999	05.04.1999	GPS Sur Kas No.3	05.04.1999	05.04.1999	
93.	93	Zahoor Rahman	Noor Rehman	FA	Sanad	TT	15	09.01.1979	Khyber	20.10.1999	20.10.1999	GPS Fazal Ahmad	20.10.1999	20.10.1999	
94.	94	Hikmat Shah	Zaman Shah	FA	Sanad	TT	15	01.01.1977	Khyber	30.10.1999	30.10.1999	GPS Pakha tara	30.10.1999	30.10.1999	
95.	95	M Mustafa	Sahib Din	SSC	Sanad	TT	15	21.05.1968	Khyber	30.10.1999	30.10.1999	GPS Khwaja mlr	30.10.1999	30.10.1999	
96.	96	Inam Ullah	Janab Gul	BA	Sanad	TT	15	08.04.1978	Khyber	30.10.1999	30.10.1999	GPS Ali Shah	30.10.1999	30.10.1999	
97.	97	Hidayat Ullah	Toti Gul	MA	Alia	TT	15	01.01.1979	Khyber	30.10.1999	30.10.1999	GPS Zardad	30.10.1999	30.10.1999	
98.	98	Said Alam	Jumadar	SSC	Sanad	TT	15	05.04.1975	Khyber	30.10.1999	30.10.1999	GPS Haleem Kalay	30.10.1999	30.10.1999	
99.	99	M Ishaq	Abdul Hassan	FA	Sanad	TT	15	01.03.1980	Khyber	30.10.1999	30.10.1999	GPS Gul Ahmad	30.10.1999	30.10.1999	

16

Gul Habib	Killi	GMS Khaista Gul Jamrud
	GPS Wali Bala	Against Vacant SST (General) Post at GHS Chora Jamrud

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

S.I. No	Name	Present Place of Posting	Placement
1	Farid Alam	GHS Abdul Ghafoor Khan	Against Vacant SST (General) Post at GHS SIHAGAI JAMRUD

PLACEMENT OF SST (General) BPS-6
(PROMOTED FROM SATYATTO)

S. No	S.I. No	Name	Present Place of Posting	Placement
1	9	Said Bahoo Jan	GHS Zeen Tara	Against Vacant SST (General) Post at GHS Zeen Tara LKL

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

S. No	S.I. No	Name	Present Place of Posting	Placement
1	72	Muhammad Yousaf	GPS Warmando	Against Vacant SST (General) Post at GMS Latif Killi LKL

Terms and conditions

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

(Signature)
 (Muhammad Jadoon Khan)
 Agency Education Officer
 Khyber Agency at Jamrud

18-7-2017

(Signature)


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

(12) (17)

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

Agency Education Officer
Khyber Agency at Jamrud

12-10-17


A handwritten signature is present above a circular stamp. The stamp contains the text "AGENCY EDUCATION OFFICER" and "KHYBER AGENCY AT JAMRUD".

E

(18)

No. 25

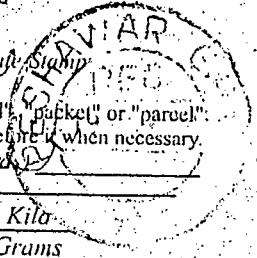
1916

For Insured
RGL46489447
except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgement is due.

Rs. 1/0
Ps.

Received a registered*
addressed to

Director General of Posts



Initials of Receiving Officer with the word "insured" before it when necessary.

Insured for Rs. (in figures) 2000

If insured.

Insurance fee Rs. 2/- (in words) Weight 100 Grams

Name and address of sender

بختور رضاب اس ای او صاحب ضلع جسر اکیسی
عنوان! درخواست بابت بندہ کو ٹی ٹی سینار کی لسٹ کا مکمل پروف
اور اس ایس ایس ٹی پوسٹ سے محروم رکھنے کا وجہ بعد ثبوت تحریر کی شکل
میں عطا کرنے کا حکم فرماتے۔

صاحب عالی؟

مؤدبہ تشریح ہے کہ بندہ آپ صاحبان کی خدمت میں رقم
درخواست اور اپیل کرتا ہے۔ بندہ سن 2017-10-12ء کو اس ایس ایس ٹی
(جنرل) پوسٹ کو پروموشن کرنے میں صوبہ سٹی سنسٹر تھا لو جی شہر ہے۔
بندہ کو اس ایس ایس ٹی پوسٹ کو پروموشن کرنے سے محروم کر رکھا ہے۔
اس لیے آپ صاحبان میرا یہ فرما کر بندہ کو ٹی ٹی سینار کی لسٹ کا
مکمل پروف اور اس ایس ایس ٹی پوسٹ سے محروم رکھنے کا وجہ
مکمل ثبوت تحریر کی شکل میں اور دستخط سے بھر پور ثبوت نامہ
عطا کرنے کا حکم فرماتے۔

عین نوادر شاہ پور۔ المرقوم: 22-10-2017

الارضیٰ

آپ کا نام بدارہا لوی خان ٹی ٹی ٹی گورنمنٹ ہائی سکول لوہا ضلع خیر

Applicant. Sing

22/10/2017

محفوظ حساب کے لیے اور صاحب ضلع شہر کینسی

صاحب عالی

مؤدبہ گزارش کہانی ہے کہ بہتر آپ صاحبہ کی طرف

میں رقم درخواست کرتا ہے۔ بہتر جسٹس کی لکھی تصدیق

1998-10-02 سے بہتر 12/10/2017 کو صورت میں رقم لکھی ہے

اور بہتر 12/10/2017 کو اس اس کی پوسٹ سے حرم کر دیا ہے

بہتر اور صاحبہ اس اس کی پوسٹ کو پروہوٹ کرنا
- صلح فرما کر ہونے ہوگی -

عسین گزارش ہوگی

آغا صاحب - مرحوم : 12-11-2017

آپ کا نام میرا بھائی ہے اور اس کی لکھی تصدیق کرنا

Handwritten signature

12/11/2017

Official stamp and signature

کفتر قہاب ڈائریکٹر آف ایجوکیشن (فاٹا) قبائلی علاقہ فاٹا سٹیٹ ایجوکیشنل بورڈ
صائب علی

مؤدبانہ گزارش ہے کہ بندہ آپ صاحبان کی حدیث میں اسلئے تڑپتا ہے۔
بندہ نے دو دفعہ ایجنسی ایجوکیشن ضلع ڈیرہ کو درخواست دی ہے
مگر ابھی تک اس پر قانونی تصور میں فیصلہ نہ ہوا
بندہ بحیثیت ٹی ٹی ایف کے تاریخ 1994-10-02 سے اور
تاریخ پیدائش 1970-03-02 سے اور بندہ 2017-10-12ء ڈی سی
میں صوبہ سینیٹر ٹی ٹی ایف کے سٹیڈی اسٹیٹ میں اول نمبر پر ہے۔
بندہ 2017-10-12ء کو اس ٹی ٹی ایف کے پروفیسر کے طور پر
اسلئے آپ صاحبان میرا پائل فرما کر بندہ اس ٹی ٹی ایف کے پوسٹ کو
بہتر طور پر کرنے کا پابند ہے اور فرمائے
عین گزارش ہوگی

اندریں المرقوم: 19-04-2018

آپ کا نام بہتر رہا یوں خان ٹی ٹی ایف کے پوسٹ کو بہتر کرنے کے لئے

Forward for N/Action to AEO Khyber,
Solve that problem in properly
Deputy Director Education (FATA)

Handwritten signature

23

25

No. 8/6 For Insurance Notices see reverse.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgement is due.

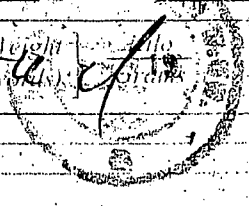
Rs. 15
58

Received a registered*
addressed to DEB

Date-Stamp 17/03/2019

Initials of Receiving Officer DEB
*Write here "letter", "postcard", "packet" or "parcel"
with the word "insured" before when necessary.

If insured. { Insured for Rs. (in figures) _____ (in words) _____
Insurance fee Rs. _____ (in words) _____
Name and address of sender _____
Height _____
Weight _____



[Handwritten signature]

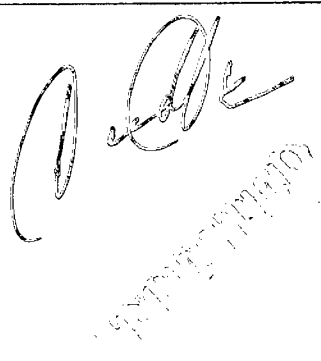
محضوریہ جناب ڈی ای او صاحب ٹرائیبل ایس ایف ضلع خیرپور

جناب عالی!

مؤدبانہ گزارش کی جاتی ہے کہ بندہ آپ صاحبان کی خدمت میں ایپل کرتا ہے۔ بندہ دو بنیادی قوانین اور شرائط پر مہتمم کرنے کے لیے تحریری ثبوت کا اعلیٰ درجہ جاری کر کے جو دو مسائل درج ذیل ہیں۔
ممبران مورخہ 02-10-1994 کو ٹی ٹی پوسٹ لٹرنٹ کے لیے بنیادی شرائط
ممبران مورخہ 11-10-2017ء کو فیصلہ لہجہ شہر کے لیے ایس ایس ٹی (جنرل) پوسٹ کو پروموت کے لیے بنیادی شرائط، پروفیشنل ٹرانسپیکشن، اکیڈمک تعلیمی اسناد وغیرہ کا عمل ثبوت۔

یہذا بندہ ایپل استدعا کرتا ہے کہ درج بالا دو بنیادی مسائل کے قوانین اور شرائط تحریر و شکل میں ثبوت کا اعلیٰ درجہ جاری کر جناب عالی! میں دفعہ قبل سے بندہ نے اپنا جان مہتمم کرنے کے لیے بائی سینڈ درخواست دیا ہے اور ابھی تک اس دو بنیادی مسائل کے لیے تحریر و ثبوت جمعہ دستخط اور تصدیق شکل میں ظاہر نہیں ہوا۔
رہے آپ صاحبان میرا جان فرما کر بندہ کو درج بالا دو مسائل درپیش ہونے پر تحریری ثبوت ڈاک پر بھیجنے کا حکم جاری فرمائے۔
عین گزارش ہو گا۔ المرحوم:
اعراض۔

آپ کا بعد ارہا ہون خان ٹی ٹی ٹورنٹ ہال سکول لوہا شاہ ضلع خیرپور
دستخط۔
17-05-2019



CLOSURE FINDINGS	
1	COMPLAINT NO. No: PO/Complaint/0498/05/2019
2	NAME & ADDRESS OF THE COMPLAINANT Mr. Hamayun s/o Jehanmir r/o Loye Shelman, Village Nali killi, Durma kor, Landi kotal, District Khyber. (Contact # 03348722340).
3	NAME OF THE AGENCY COMPLAINED AGAINST 1. Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar. 2. Director, Directorate of Elementary & Secondary Education Department Khyber Pakhtunkhwa. 3. District Education Officer (Male), Khyber at Landi kotal. 4. Principal, Government Primary School, Loye Shelman, Landi Kotal, District Khyber.
4	NAME OF THE INVESTIGATION OFFICER Mumtaz Ahmad Consultant-II.
5	SUBJECT OF COMPLAINT Violation of seniority rules in promotion of TT Teacher.
6	DATE OF REGISTRATION 27/05/2019.
7	DATE OF FINDINGS 05/12/2019.

THE COMPLAINT

Mr. Hamayun Khan instituted a complaint stating that he was recruited as Theology Teacher (TT) w.e.f 02/10/1994. As per seniority list he was most senior amongst the Theology Teachers but was ignored from promotion to the post of S.S.T. Another Junior TT namely Mr. Muhammad Yousaf was promoted to the post of SST by DEO, District Khyber. He has requested to peruse the service record and ACR's of both Teachers to determine who was most deserving for promotion. He has requested this forum to direct the DEO, District Khyber to promote him from the date his Junior TT was promoted.

REPORT OF THE AGENCY

Notices under Section 10(4) of the Khyber Pakhtunkhwa Provincial Ombudsman Act, 2010 were issued on 29/05/2019 to the Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar, Director, Directorate of Elementary & Secondary Education Department Khyber Pakhtunkhwa, District Education Officer (Male), Khyber at Landi Kotal and Principal, Government Primary School, Loye Shelman, Landi kotal, District Khyber to meet the allegations and submit reply including rebuttal if any. No response, was received from the aforesaid functionaries of the Agency, therefore, reminders were issued on 03/07/2019, 24/07/2019 and 02/08/2019 followed by notices of hearings on 06/09/2019 (fixing the case on 25/09/2019) but neither received reply nor attended the Hearings by DEO District Khyber. DEO at last, submitted reply and stated that appointment date of Muhammad Yousaf and Mr. Hamayun Khan was same but the professional degree of B.Ed was obtained by the former in 2016 from Allama Iqbal Open University whereas the latter got it from Al-Khair University after


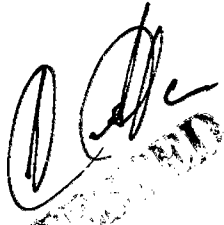
the year 2008 which degree was not acceptable for the purpose of recruitment of teachers, therefore, the latter teacher was dropped from promotion and Muhammad Yousaf TT was recommended for promotion to the post of SST (General) on sole ground that he got B.Ed degree from Allama Iqbal Open University whereas Mr. Hamayun Khan got B.Ed degree from Al-Khair University AJK after 2008.

HEARING

The case was fixed for hearing on 25/09/2019. DEO District Khyber did not attend the hearing. The Complainant appeared for hearing and contended that he was senior most TT but was ignored and junior most TT was promoted. The case was again fixed for hearing on 15/10/2019. Mr. Abdul Qayum Khan and representative of DEO appeared and it was agreed that the DEO would consider the promotion case in the light of seniority rules and verification of B.Ed degree by HEC of the complainant. The case was re-fixed on 03/12/2019. ADEO Bara Khyber appeared for hearing. The complainant has also attended the hearing and placed on record the judgment dated 07/05/2019 passed by the Supreme Court of Pakistan in Civil Appeals No. 235-252-L of 2012 and others, directing interalia as under: -

"The matter in issue pertains to validity of degrees issued by Al-Khair University and Preston University. After hearing the parties we believe that the said degrees need to be re-verified by the Higher Education Commission (HEC) in terms of the requirements of their law before they can be held to be valid and the respondents entitled to any benefit thereunder. The learned counsel for the parties agreed to the disposal of these cases in terms that all the private respondents shall apply to the HEC for the verification, equivalence, recognition and validity of their said degrees on applications to be filed by the said private respondents. We expect the HEC to decide the individual cases strictly in accordance with the Higher Education Commission Ordinance, 2002, rules and guidelines issued thereunder. The needful shall be done within four weeks of the filing of the individual applications. The respondents shall make available all further information and documents as may be required by the HEC to complete this process. Upon such verification or otherwise, the respective governments / departments shall proceed further strictly in accordance with law. The above-mentioned judgments of the High Courts are set aside and the listed appeals and petition are disposed of in the above terms."

The Complainant stated that the B.Ed degree already verified by HEC on 16/04/2019 and placed on record a copy of B.Ed degree. He further stated that he has no objection to refer the said degree to HEC for re-verification. He further stated that B.Ed degree was not necessary for promotion to SST because he was MA in Islamiat and fulfilled the requisite qualification for promotion to the post of SST.



ATTACHED


G

27

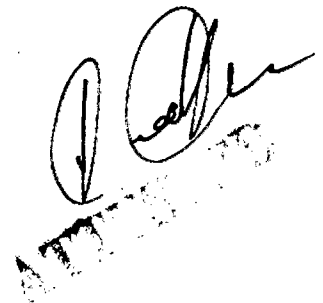
(27)

FINDINGS

The Complainant's B.Ed degree may be sent to the HEC for re-verification in the light of the judgment of Apex Court referred to above and if it is verified by HEC, the Complainant may be considered for promotion to SST (General) post from the date his junior was promoted. Pertinently it is mentioned that B.Ed degree was not requirement for promotion to the post of SST (General) but DEO Bara misconstrued the promotion rules by ignoring him on this sole ground and he determined seniority under rule 17 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989. After receipt of verified B.Ed degree, DEO Bara may convene the DPC meeting within one week to consider the case of promotion of Complainant from the date his junior was promoted to protect the legal rights of the Complainant under intimation to this Forum.


AQAL BADSHAH
PROVINCIAL OMBUDSMAN.

05/10
11.8





HIGHER EDUCATION COMMISSION

Sector II-9, Islamabad (PAKISTAN)

Telephone: 0092 51 90400900, Fax: 0092 51 90400902

URL: <http://www.hec.gov.pk>

Ref. 5-3/A&A (Att. Cell)/HEC/2020 /134
February 06, 2020

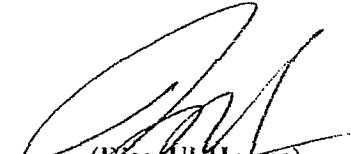
The District Education Officer,
Khyber Pakhtunkhwa Elementary &
Secondary Education Department,
Khyber Tribal District At Jamrud.

Subject: **RE-VERIFICATION**

With reference to your letter No. 16133 dated 13-01-2020 on the subject cited above.

2. I am directed to inform that B.Ed degree and Detailed Marks Certificate issued by Al-Khair University (AJK) in respect of **Mr. Humayun Khan** has been attested by the Higher Education Commission vide attestation tickets Numbers **1802349 & 1802350** against CNIC No. **21203-4826133-3**. However, the applicant's CNIC No. in your above referred letter is not mentioned. It is therefore requested to verify the identity of degree holder at your own end.

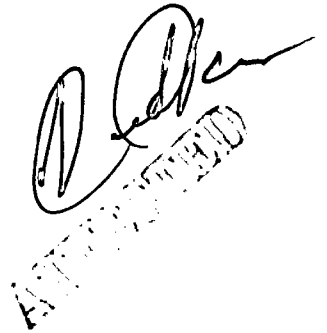
3. This issues with the approval of Competent Authority.


(Kiaz-Ul-Haque)
Assistant Director (A&A)

Sahib
8
10/2

No. 454.

10/2/2020



(29)



Khyber Pakhtunkhwa Elementary & Secondary Education Department

DISTRICT EDUCATION OFFICE
KHYBER TRIBAL DISTRICT AT JAMRUD

PHONE 091-5820584 FAX 091-5820584

No: 1653 DATED: 13/01/2020

(Most Urgent)
Court Case

To

The Director General
HEC Islamabad Pakistan.

Subject;

RE- VERIFICATION

Memo,

Reference Provincial Ombudsman Secretariat Khyber Pakhtunkhwa Complaint
No. PO/Complaint/0498/05/2019/12076 dated. 05/12/2019. (Copy Enclosed)

Enclosed find herewith photo copies of DMC and Degree (B.Ed) in respect of
Mr. Humayun Khan S/O Jahan Meer under Roll No. 3642 session 2009 passed from AL-
Khair University (AJK) for re-verification and returned to the undersigned in registered cover.

[Signature]
13/1/20
DISTRICT EDUCATION OFFICER
KHYBER TRIBAL DISTRICT AT JAMRUD

[Signature]
ATTACHED

[Handwritten marks]

ME

No 028207

Registration No AUDIK(E)234-20

Al-Khair University



Session 2008 - 2009

This is to certify that

Humayun Khan S/O Jahan Meer

Has obtained the Degree of

Bachelor of Education

in this University at the Examination held in October, 2009


Controller of Examinations


Chancellor

Muzaffarabad February 17, 2011

30

15

OFFICE OF THE DISTRICT EDUCATION OFFICER DISTRICT KHYBER AT JAMRUD

Revised

Working papers for the promotion of STT/ TTs male to the post of SST (General)

No. of Vacant SST (G) Post=22

Share of Initial recruitment @ 25% =06

Share of promotion of STT/TTs @ 4%=01

To be promoted=01

Proposed for promotion =01

LIST OF STT/TTs (MALE) FOR THE PROMOTION OF STTs/TTs TO SST(GENERAL)

S.No.	Seniority No.	Name of Teacher	F/Name	Place of Posting	Designation	BPS	D/O Birth	Qualification		D/O App: as Regular TT	Whether eligible	Remarks
								Acad:	Prof:			
1	54	Hamayun Khan	Jehan Mir	GHS Durma Kor Landi Kotal	STT	16	02/03/1970	MA D/O Dec,22.03/2006	B.Ed D/O Dec, 26/02/2010	02/10/1994	eligible	Column 1 and 10 revised and corrected as per court Decision
2	56	Muhammad Yousaf	Abdul Aziz	GPS Warmando Mela	STT	16	05/04/1974	BA 2006	B.Ed 2015	02/10/1994		Wrongly promoted

CERTIFICATE

- It is certified that all the STT/TTs (Male) included in the panel for promotion to SST (General) Post
 - Hold the post on regular basis and non of them is holding the post on adhoc/acting charge basis contract.
 - Have completed the required minimum length of qualifying service and qualification service and qualification as required for promotion to the post of SST (General) under the rules.
 - Non of them is on depotation to any organization under the Federal Provisional /autonomous/semi-autonomous international organization.
 - Neither any disciplinary/ departmental proceeding /anti-corruption Judicial Inquiry in pending against them nor has any penalty been imposed upon any one of them during the Service.
 - No. one is on long live Ex-Pakistan leave.
 - Their ACRs, Synopsis are free from adverse remarks.
 - They are all alive and serving.
 - Their appointment orders against the TTs posts are attached herewith.
- The departmental promotion committee is requested to determine the suitability of the above STT/ TTs for promotion of SST (General) BPS -16.

CHAIRMAN
DISTRICT EDUCATION OFFICER
DISTRICT KHYBER AT JAMRUD

[Handwritten signature]

Member
Mr. Waheed Ullah Ex- ADEO Bara Circle II
Focal Person Litigation

[Handwritten signature]
13/5/2012

[Large handwritten signature]

OFFICE OF THE AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD.

1 papers for the promotion of STT/TTs male to the post of SST (General)

vacant SST(G) post=22

of Initial recruitment @25%=6

of promotion of STT/TTs@4%=1

one promoted=1

one deferred for promotion=1

LIST OF STTs/TTs(Male) for the promotion of STTs/TTs to SST(General)

SR	Name	F/Name	Place of Posting	Designation	BPS	D/O Birth	Qualification		D/O App: as regular TT	Whether eligible	Remarks
							Acad :	Prof :			
	Muhammad Yousaf	Abdul Aziz	GPS Warmando	STT	16	05/04/1974	BA	B.Ed	02/10/1994		
	Hamayun Khan	Jehan Mir	GHS Durma Kor	STT	16	2/3/1970	MA	B.Ed	1/1/1999		

CATE

It is certified that all the STT/TTs (male) included in the panel for the promotion to SST(General) post

- a. Hold the post on regular basis and non of them is holding the post on adhoc/acting charge basis/contract.
- b. have completed the required minimum length of qualifying service and qualification as required for promotion to the Post of SST(General) under the rules.
- c. non of them is on deputation to any organization under the federal provincial/autonomous semi-autonomous international organization.
- d. Neither any disciplinary departmental proceeding anti-corruption judicial inquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.
- e. No One is on long live/Ex-Pakistan leave.
- f. Their PDRs, Synopsis are free from adverse remarks
- g. They are all alive and serving
- h. Their appointment orders against the TTs Posts are attached herewith
- i. The serial list of B-16 officers is final, undisputed and not subjudicious

departmental promotion committee is requested to determine the suitability of the above STT/TTs for promotion to SST(General) B-16 with immediate effect

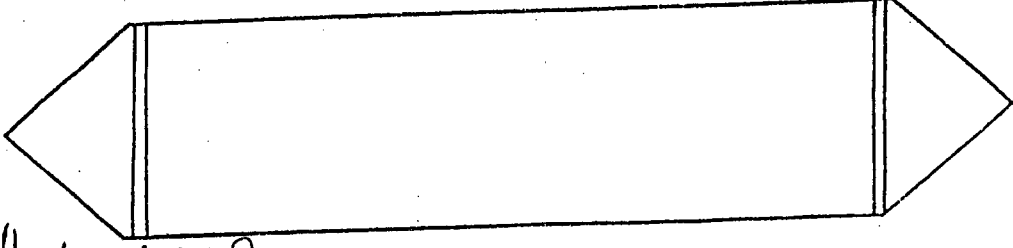
Member
Jadoon Khan
Sher Jaman Circle No 1
Bara Khyber Agency

Member
Shahzadullah
AAEO Circle No 2
Bara Khyber Agency

Member
Khan Azam AAO
Jamrud Khyber Agency

Member
Sadeem Khan
Land Pol.

بعدالت جناب جسٹس محترم سر جسٹس سید سید محمد علی شاہ



2020ء منجانب ایسٹاٹ
صہمالون خان بنام سید سید محمد علی شاہ

موزخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام لہذا کیلئے سید سید محمد علی شاہ اسرا اقبال

مقرر کر 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 ثالت ہ فیصلہ بر حلف دینے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی 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 اختیار 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
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو نرچہ ہر جائہ التوائے مقدمہ کے سبب سے وہ ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکورہ کریں۔ لہذا وکالت نامہ لکھد یا کہ سندر ہے۔

المرقوم 21 07 2020

العبد _____ واہ العبد _____

کے لئے منظور ہے
سید سید محمد علی شاہ
0345 9499710

بمقام
0300-5945940

"A"

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

No. 11402 20

APPEAL No..... of 20

Hamayun Khan

Appellant/Petitioner

Versus

The Secy ERSE K.P. Pesh.

RESPONDENT(S)

(Counsel)

Syed Saad Shah C

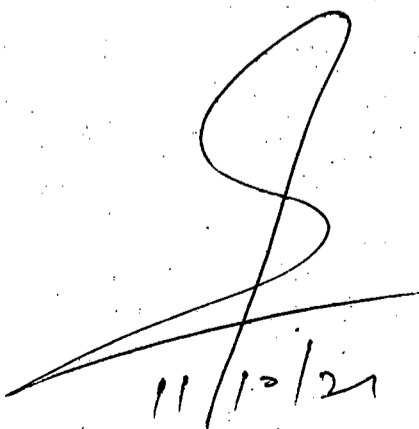
Notice to Appellant/Petitioner

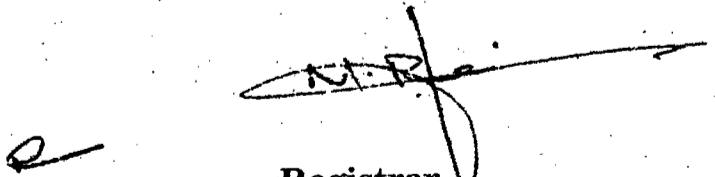
AKhunjada Asad Iqbal Advocates

High Court Peshawar. 0300-5945940.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on..... at.....

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.


11/10/21


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

“A”

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

(Reg)
No.

53

APPEAL No.....11402..... of 20 20

Hamayun Khan

Appellant/Petitioner

Versus

Secy. EGSE, KPK Peshawar


RESPONDENT(S)

Notice to Appellant/Petitioner

Hamayun Khan S/o Jehanmir
R/o Laili Salman, Mohallah Dorma Kor, Landi
Kotal, Teh: Landi Kotal, Dist: Khyber.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 29/3/2022 at 9:00 am

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

“A”

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

No.

APPEAL No. 11402 of 20 20

Hamayun Khan

Appellant/Petitioner

Versus

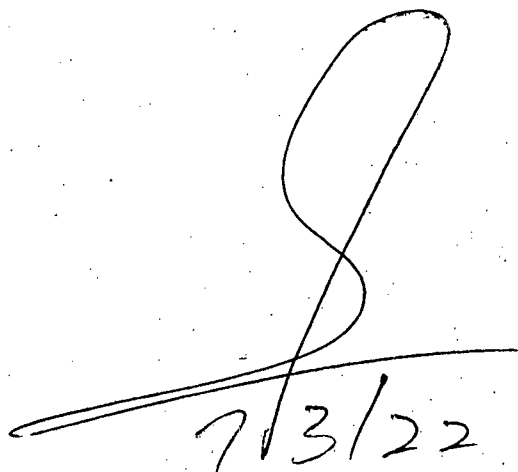
Seyi, E& SE, KPK, Peshawar

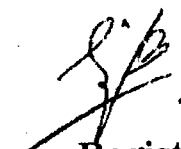
RESPONDENT(S)

Notice to Appellant/Petitioner Counsel Syed Saad Shah &
& Akhunzada Asad Iqbal,
Advocate, High Court, Peshawar.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 29/3/2022 at 9:00 am

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.


7/3/22


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No. (Regd)

SB

APPEAL No.....11402..... of 20 20

Hamayun Khan

Appellant/Petitioner

Versus

Secy ESSE department, KPK, Civil Secretariat Peshawar

RESPONDENT(S)

Notice to Appellant/Petitioner ✓ Hamayun Khan S/o Jehanniz R/o
Lui Shalman, Mahallah Dharma Kor, Landi Kotal
Teh. Landi Kotal, District Khyber

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on.....10/06/2022..... at.....9:00.....

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

(Last chance)

For



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No. 11902 of 20 20

Hamayun Khan

Appellant/Petitioner

Versus

Secy ESSE deptt: KPP, Civil Secretariat Peshawar

RESPONDENT(S)

Counsel

Notice to Appellant/Petitioner

Syed Saud Shah and Akhunzada
Asad Qbal Advocates High Court Peshawar
Cell No. 0300-5945940

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 10/06/2022 at 9:00

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

(Last chance)

اعجاز

14-4-2022

For

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.