1st Nov., 2022 01. Mr. Shamsul Hadi Advocate for appellant present. Mr. Muhammad Adeel Butt, Addl. Advocate General alongwith Mr. Muhammad Usman, ADEO (Litigation) for the respondents present.

O2. Vide our detailed order of today, placed in connected Service Appeal No. 7231/2021, titled "Sher Hayat Khan Vs. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar and others", this appeal is disposed of in the same manner. Costs shall follow the event. Consign.

03. Pronounced in open Court at Peshawar and given under our hands and the seal of the Tribunal on this 1st day of November, 2022.

(Farcena Paul)

Member (E)

(Kalim Arshad Khan)

Chairman

28.04.2022

Clerk of learned counsel for the appellant present. Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for official respondents No. 1 to 3 present. Nemo for private respondents No. 4 to 19, hence they are proceeded ex-parte.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Supreme Court of Pakistan. Adjourned. To come up for arguments on 19.07.2022 before the

D.B.

(Mian Muhammad) Member (E) (Salah-ud-Din) Member (J)

19.07.2022

Proper Bench is not available, therefore, case is adjourned to 20.10.2022 for the same as before.

Reader

20th Oct, 2022

Junior to counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Asst: AG for respondents present.

Junior to learned counsel for the appellant seeks adjournment on the ground that learned counsel is busy before the Hon'ble Peshawar High Court (Dar Ul Qaza) Swat Bench. Last opportunity is granted to argue the case on the next date failing which the case will be decided on the available record without the arguments. To come up for arguments on 01.11.2022 before D.B.

(Fareeha Paul) Member(Executive)

(Kalim Arshad Khan) Chairman 21.10.2021

Junior to counsel for the appellant and Mr. Muhammad Adeel Butt, Addl. AG for the official respondents present. Nemo for private respondents.

Written reply of the respondents is still awaited. Learned AAG is required to contact the official respondents. Proper notices be issued to private respondents. Last opportunity is granted to the respondents to furnish reply/comments within 10 days in office positively, failing which their right of reply shall be deemed as struck off. Case to come up for arguments on 11.01.2021 before the D.B.

(Salah-ud-Din) Member(J)

Junior to counsel for the appellant. Mr. Kabirullah 11.01.2022 Khattak, Addl. AG alongwith Mr. Shahid Anwar, ADEO for official respondents No. 1 to 3 present. Nemo for private respondents No. 4 to 19.

> Representative of official respondents No. 1 to 3 submitted reply/comments which are placed on file. Notice be issued to the private respondents No. 4 to 19 for submission of reply/comments. Last opportunity is granted to the private respondents No. 4 to 19 to furnish reply/comments on or before next date, failing which their right to submit reply/comments shall be deemed as struck off by virtue of this order. To come arguments before the D.B on 28.04.2022.

> > Atiq-Ur-Rehman Wazir)

Member (E)

05.08.2021

Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant contends that the case of Mr. Asghar Ali Vide Service Appeal No. 1191/2020 involving common question of facts and law has already been admitted for regular hearing. Further contends that the appellant has suffered in term of her due right for promotion by wrong promotion of others i.e. private respondents. Points raised need consideration. appeal is admitted for hearing subject to all legal objections including that of limitation to be determined The appellant is directed to deposit during full hearing. security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after If receipt notices, positively. the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 21.10.2021 before the D.B.

Appellant Deposited Second & Process Fee

Charrman

19.01.2021

Appellant present through counsel.

Vide order dated 19.01.2021 in the connected service appeal titled Muhammad Rasool Vs. Education Department, file to come up alongwith connected files on 20.02.2021 before S.B.

(Rozina Rehman) Member (J)

20.04.2021 Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 05.08.2021 for the same as before.

Reader

Form-A FORMOF ORDERSHEET

Court of			
Case No	7219	/2020	

CNa	D-4 6 1	
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	23/9/2020	As per direction of the Worthy Chairman this case
. '		submitted to the S. Bench for decision on office objection. To be put up there on 3/11/20
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-		as of the District Bar Association, Peshawar, ar
		observing strike today, therefore, learned counse
		for appellant is not available today. Adjourned t
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		(Muhammad Jamal Khan) Member (Judicial)
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BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

VERSUS

APPLICATION FOR GRANTING
PERMISSION FOR EXTRA
COPIES AFTER ADMITTING THE
CASE

Respectfully Sheweth:

- 1. That the above titled case is filing today in which no date of hearing is yet been fixed.
- 2. That original copies of the case has been filed and this Hon'ble Tribunal, and after admitting the case this Hon'ble Tribunal may granting permission for submission of extra copies.
- 3. That there is no legal bar for grating permission for extra copies.

It is, therefore, prayed that the application may kindly be allowed as prayed for in heading of application.

Through

Date: 24/08/2020

. 8

Applicant

Shams Ul Hadi Advocate, High Court, Peshawar

The present appeal was submitted on 23.6.2020 by the appellant through Mr. Majeedullah Advocate, so many deficiencies were found in the appeal, objections were raised by this office and appeal was returned to the counsel for the appellant. Today on 12.08.2020 the appeal is resubmitted by the appellant through Mr. Shamsul Hadi Advocate, the learned counsel totally changed the previous memo of appeal and submitted a new memo of appeal. It is pertinent to mention here that the learned counsel only changed the memo of original appeal but he submitted the previous spare copies which are also incomplete. There are contradiction between the original memo of appeal and spare copies. Moreover the counsel for the appellant filed the present appeal against the two different cause of action i.e. promotion and seniority list and also made/preferred two spare departmental appeals but impugned seniority list is not attached with the appeal. Therefore, the objections raised by this office on 23.6.2020 are still stand and the appeal is returned again to the counsel for the appellant for completion and resubmission within 20 days. Note. Original appeal as well as spare copies shall be submitted in approved file covers and duly tagged.

No. 2485_/S.T, Dt. / 3 - 8 /2020.

> SERVICE TRIBUNAL PESHAWAR.

Mr.Shamsul Hadi Advocate, Swat.

Resubuitted after

Needle Requirements

2h-8-20

Re-submilled.

that the Seniority list was not provided to the appelled by The defortment thats why the said benionity hist was not annewed and furthermore There is no eyel bon to him the promotion & leavisity in one and in The Same affect.

It is Therefor regard to tile / fut up The Said afteal before the Court / Tot land to meet the end of Tustin

The appeal of Mr. Matiur Rehman C.T GMS Sogali Talash Dir Lower received today i.e. on 23.06.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got singed by the appellant.
- 2- Annexures of the appeal may be flagged.
- 3- Annexures of the appeal may be attested.
- 4- Addresses of respondent Nos. 4 to 19 are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 5- Copy of impugned promotion order dated 25.2.2020 mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.
- 6- Copy of departmental appeal against the impugned promotion order is not attached with the appeal which may be placed on it. Annexure-D is an appeal against the seniority list but not against a promotion order because the impugned promotion order was passed on 25.2.2020 and appeal was made on 24.2.2020 much before passing the impugned promotion order.
- 7- Copies of tentative seniority list and objection on tentative seniority list mentioned in para-2 of the memo of appeal are not attached with the appeal which may be placed on it.
- 8- Twenty one more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1322 /S.T,
Dt. 23-06/2020.

REGISTRAR SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Mr. Majeedullah Adv. District Court Dir Lower.

Responded Sir

et is requested that the requisite

documents as Per order duties 23-6-2020.

Could not be secred therefore It is requisited

test time Be Extended for Complaince.

459

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR.

Service Appeal No/2020.	
Mati Ur Rahman (CT)	Appellant.
VERSUS Director, E&S Education Pakhtunkhwa	Respondents

INDEX

S.N	Description of Documents	Annex	Pages
1.	Memo of Appeal along with Affidavit.		15
2.	Addresses of Parties.		6
3.	Copies of appointment order and promotion order.	Α	7-8
4.	Copy of impugned promotion order dated:25.02.2019 € .	В	9-15
5.	Copies of departmental appeals.	С	16-17
7.	Copy of application to DEO Dir lower.	D	18
9.	Wakalat Nama		19

Арреиаг

Through

Shams ul Hadi

Advocate.

Office: Swat Shopping Mall, Opposite Peshawar

High Court Mingora Bench.

Clerk Cell No.03474773449



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL



PESHAWAR

APPEAL NO. 7219 /202

Chyber Pakhtukhwi Service Tribonal

Diam 20 1 36

Mr. Matiur Rahman S/O Faqir Muhammad

Certified Teacher (BPS-15), GMS Soghali Talash Dir Lower KP

.Dated PPELLANT

VERSUS

- 1. The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2. The Director (E&SE) Depatment, Khyber Pakhtunkhwa, Peshwawar.
- 3. The District Education Office (M), District Dir Lower.
- 4., Mr. Ihtisham Ul Haq, CT (BPS-15) (NTS)
- 5. Mr. Lal Zada, CT (BPS-15) (NTS)
- 6. Mr. Latif Ur Rehman, CT (BPS-15) (NTS)
- 7. Mr. Misbah Ur Rehman, CT (BPS-15) (NTS)
- 8. Mr. Aziz Ullah Jan, CT (BPS-15) (NTS)
- 9. Mr. Irfan uddin, CT (BPS-15) (NTS)
- 10. Mr. Bakht Munir, CT (BPS-15) (NTS)
- 11. Mr. Inayat Ullah, CT (BPS-15) (NTS)
- 12. Mr. Zakir Ullah, CT (BPS-15) (NTS)
- 13. Mr. Waheed Zada, CT (BPS-15) (NTS)
- 14. Mr. Muhammad Israr, CT (BPS-15) (NTS)
- 15. Mr. Majeed Ullah Khan, CT (BPS-15) (NTS)
- 16. Mr. Mehmood Ur Rehman, CT (BPS-15) (NTS)
- 17. Mr. Irshad Mehmood, CT (BPS-15) (NTS)
- 18. Mr. Muhammad Shahid, CT (BPS-15) (NTS)
- 19. Mr. Mumtaz Bakht, CT (BPS-15) (NTS)

All care of District Education officer (M), Dir Lower.....RESPONDENTS

Filedto-day

23/6/2020

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974, AGAINST THE PROMOTION ORDER ISSUED BY THE RESPONDENTS NO 1 TO 3 DATED: 25-02-2020, WHEREBY THEY ILLEGALLY PROMOTED THE PRIVATE RESPONDENTS NO 4 TO 19 ADHOC/CONTRACT EMPLOYEE OF 2014 CT BPS-15 TO SCT BPS-16 AND THE APPELLANT REGULAR EMPLOYEE OF CT BPS-15 IS EVENTUALLY PLACED JUNIOR TO THE PRIVATE RESPONDENTS NO 4 TO 19.

PRAYER

THAT ON ACCEPTANCE OF THIS APPEAL THE IMPUGNED ORDER DATED: 25-02-2020 ISSUED BY THE RESPONDENTS NO 1 TO 3 MAY KINDLY BE SET ASIDE TO THE EXTENT OF PROMOTION OF PRIVATE RESPONDENTS NO 4 TO 19 AND THEY MAY KINDLY BE CONSIDER JUNIOR TO APPELLANT AND THE APPELLANT BE PLACED SENIOR TO THE PRIVATE RESPONDENTS NO 4 TO 19 AND THE APPELLANT MAY KINDLY BE ORDERED TO BE PROMOTED TO THE POSTS OF SCT ON THEIR RESPECTIVE TURN.

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR.

Service Appeal No.	/2020.
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Mati Ur Rahman (CT)

Presently posted at GMS Soghalai Dir Lower

R/O Village Marrishah , Dir Lower......Appellant.

VERSUS

- 1. Director, Elementary & Secondary Education Pakhtunkhwa, Peshawar
- 2. District Education Officer (M), Dir Lower.
- 3. Secretary Education, Khyber Pakhtunkhwa, Peshawar.
- 4. Ihtesham ul Haq (C.T)

Presently posted at GHS Lal Qila Dir lower.

- 5. Latif ur Rehman (C.T)
 - Presently posted at GHSS Watangy, Dir lower.
- 6. Misbah ur Rehman (C.T)

Presently posted at GHS Watangy, Rabat, Dir lower.

7. Azizullah Jan (C.T)

Presently posted at GHS Bajaro, Dir lower.

8. Irfanudin (C.T)

Presently posted at GHS Sia Warghar, Dir lower.

9. Bakht Munir (C.T)

Presently posted at GHSS RehanPur ,Dir lower.

- 10. Inayatullah (C.T)
 - Presently posted at GHS Darmal Payan ,Dir lower.
- 11. Zakirullah (C.T)

Presently posted at GHSS Manyaal Tehsil Lal Qila, Dir (L)

12. Waheed Zada (C.T)

Presently posted at GHS GHSS Munda, Dir lower.

13. Muhammad Israr (C.T)

Presently posted at GHS Makhai ,Dir lower.

14. Majidullah Khan (C.T)

Presently posted at GHSS Lal Qila ,Dir lower.

- Mehmood Ur Rehman (C.T)Presently posted at GHS Sadbar Kalay ,Dir lower.
- 16. Irshad Mehmood (C.T)

 Presently posted at GHSS Towda Cheena ,Dir lower.
- Muhammad Shahid (C.T)Presently posted at GHSS Manyaal ,Dir lower.
- Mujeebullah(C.T)Presently posted at GHSS Haya Serai ,Dir lower.
- 19. Rahatullah (C.T)

 Presently posted at GHSS Kambat, Dir lower.

......Respondents

APPEAL UNDER SECTION 4 OF KHYBER PUKHTUNKHWA SERVICES TRIBUNAL, ACT 1974, AGAINST THE IMPUGNED PROMOTION ORDER DATED;25.02.2020 THROUGH WHICH Respondents Nos.4 to 19 WERE PROMOTED TO THE POSTS OF SENIOR CERTIFIED TEACHER SCT (BPS-16) ON REGULAR BASIS AND ALSO AGAINST THE IMPUGNED SENIORITY LIST THROUGH WHICH RESPONDENTS NOs.4 TO 19 THROUGH RESPONDENTS NOs.4 TO 19 WERE PLACED SENIOR FROM APPELLANT.

PRAYER IN APPEAL:

ON ACCEPTANCE OF THIS APPEAL, IMPUGNED PROMOTION ORDER DATED;25.02.2020 THROUGH WHICH RESPONDENTS Nos.4 to 19 WERE PROMOTED TO THE POSTS OF SENIOR CERTIFIED TEACHER, SCT (BPS-16) ON REGULAR BASIS MAY KINDLY BE SET ASIDE AND IMPUGNED SENIORITY LIST THROUGH WHICH RESPONDENTS NO.4 TO 19 WERE PALCED SENIOR FROM APPELLANT MAY ALSO KINDLY BE DECLARE ILLEGAL, AGAINST THE LAW AND RULES AND THE SAME MAY ALSO BE SET ASIDE AND RESPONDENTS NO. 4 TO 19 MAY KINDLY BE DECLARE JUNIOR TO APPELLANT.

Respectfully Sheweth:

- 1. That initially, the Appellant was appointed as Primary School teacher (PST) since long and latter on, the appellant was promoted to the posts of Certified Teacher (C.T BPS-15).(Copies of appointment order and Promotion order are annexure-A)
- 2. That Respondents Nos.4 to 19 were appointed as Certified Teacher (C.T) on 30.04.2014 on adhoc/contract basis through NTS and as such services of Respondents Nos. 4 to 19 were regularized in the year 2018 through an act i-e " The Khyber Pakhtunkhwa Employees (Regularization of Services Act, 2018". It is pertinent to mention here that according to section 5 of the ibid Act, the employees whose services are regularized under this Act shall placed/declared junior to all other similarly placed/similar cadre employees who are in service on regular basis.
- 3. That according to the relevant rules, promotion from C.T BPS-15 to the post of SCT BPS-16, 5 years service on CT post is mandatory but through impugned promotion order dated:25.02.2020 respondents Nos.4 to 19 were promoted to the Posts of SCT BPS-16 against the relevant promotion rules and they were also placed senior on seniority list from the appellant without circulating the seniority list.(Copy of impugned promotion order dated:25.02.20 is annexure-B)
- 4. That after the impugned promotion order dated:25.02.2020, the appellant approached respondents No.1 and 2 for getting copies of impugned seniority list and impugned promotion order where they have refused to provide copy of seniority list hence the appellant filed separate departmental appeals against the impugned promotion order dated;25.02.20 and impugned seniority list, where the same were not decided within statutory period. (Copies of departmental appeals are annexure-C)
- 5. That time and again the Appellant made so many request to concerned officials for obtaining seniority list but till date no heed was paid to his requests nor the said seniority list was provided to appellant for further legal adjudication (Copy of application is annexure-D)

That being aggrieved the Appellant, prefers this appeal on the following grounds amongst others inter-alia.

GROUNDS

- A. That the actions and inactions of the respondents by promoting the respondents and are against the law and policy laid down for the purpose and the same is also against the regularization Act, 2018.
- B. That impugned promotion order dated:25.02.2020 has badly prejudice legitimate expectancy of promotion of the appellant because through impugned promotion order the official respondents have filled the vacant posts of SCT BPS-16 and they have also placed senior respondents Nos.4 to 19 on seniority list against the law and regularization Act.
- C. That the posts of S.C.T BPS-16 were filled through promotion of the respondents on illegal seniority list and the said seniority list was also not circulated and till date the same has not been communicated to appellant, just to accommodate his blue eyed persons which clearly showing the ill intention of the respondents No.1 and 2.

It is, therefore, humbly prayed that on acceptance of this appeal, impugned promotion order dated;25.02.2020 through which respondents nos.4 to 19 were promoted to the posts of Senior Certified Teacher, SCT (BPS-16) on regular basis may kindly be set aside and impugned seniority list through which respondents no.4 to 19 were placed senior from appellant may also kindly be declare illegal, against the law and rules and the same may also be set aside and respondents no. 4 to 19 may kindly be declare junior to appellant.

Or

Any other relief which this august Court deems appropriate may kindly be awarded to meet the ends of justice.

Through

Shams ul Hadi Advocate, Peshawar.

pellant

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR.

Service Appeal No/2020.	
Mati Ur Rahman (CT)	Appellant.
VERSUS	
Director, E&S Education Pakhtunkhwa	Respondents
AFFIDAVI7	<u>F</u>
I, Shams ul Hadi , Advocate, F	Peshawar do hereby as pe
information convoyed to me by	my client solemnly affirm and
declare that the contents of the	appeal are true and correct to
the best of my knowledge and	belief and nothing has been
concealed from this Hon'ble Cour	· ·
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EFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR.

Service Appeal No	/2020.
Mati Ur Rahman	(CT)Appellant
	VEDGUG

Director, E&S Education Pakhtunkhwa......Respondents

ADDRESSES OF THE PARTIES

APPELLANT:

Mati Ur Rahman

Presently posted at GMS Soghalai Dir Lower

R/O Village Marrishah, Dir Lower.

RESPONDENTS:

- 1. Director, Elementary & Secondary Education Pakhtunkhwa, Peshawar.
- 2. District Education Officer(M), Dir Lower.
- 3. Secretary Education, Khyber Pakhtunkhwa, Peshawar.
- 4. Ihtesham ul Haq (C.T) Presently posted at GHS Lal Qila Dir lower.
- 5. Latif ur Rehman (C.T)

Presently posted at GHSS Watangy, Dir lower.

- 6. Misbah ur Rehman (C.T) Presently posted at GHS Watangy, Rabat, Dir lower.
- 7. Azizullah Jan (C.T) Presently posted at GHS Bajaro, Dir lower.
- 8. Irfanudin (C.T)

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12. Waheed Zada (C.T)

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13. Muhammad Israr (C.T)

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15. Mehmood Ur Rehman (C.T)

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16. Irshad Mehmood (C.T)

Presently posted at GHSS Towda Cheena, Dir lower.

Muhammad Shahid (C.T) 17.

Presently posted at GHSS Manyaal, Dir lower.

18. Mujeebullah(C.T)

Presently posted at GHSS Haya Serai ,Dir lower.

19. Rahatullah (C.T)

Presently posted at GHSS Kambat, Dir low

Through

Shams uLHadi

Advocate.

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,		81	SAR BILAND KHAN		MUHAMMAD ZARIN		GPS BANK SAFARAI	··	GMS KHARKAI		A.V.P
			RASHID AHMAD \	1	FAZAL RAHMAN		GPS AHMAD ABAD		GHS OUGH SHARQI		A, V.P
ļ Į		82	SAID ALI SHAH	<u></u>	SULTAN ZARIN		GPS BALODARA RABAT		GHS SPINA KHWARA		A.V.f
l		35 135	MATI UR RAHMAN		FAQIR MUHAMMAD		GPS SUGHALAI		GMS SUGHALAY		A.V.F
سا		 587	SHER HAYAT KHAN		FEROZ KHAN		GPS MIAN BANDA		GCMHS TIMERGAR	A	A.V.F
			NASAR KHAN		MUHAMMAD WASH	KHAN	GP5 RANI		GMS BAROON		A.V.F.
		589 590	SAHIB ULLAH		ВАНАПАн		GPS GURGIA		GCMHS TIMERGAR	A	A.V.f
	118	P03	MUHAMMAD YAGOO	96	GHULAM TASEEN		GPS ALIMAST TOORM	ANG	GMS SIA GAWNAL		A.V.F
	119		MUHAMMAD ALTAI		HAMID ULLAH		GPS KAMAL KHAIL TA	Ll.	GHS SAFARAI		101
	120	607			MURAMMAD AZIM	 KHAN	GPS GIJMAGAT		GMS WALO TANG	 -	A.V.I
	121	609	SYED TARIO SHAH		SHERIN ZAMAN		GPS KHALL NO.1		GMS RAZAGRAM	/	X V.1
	122	610	_ -		FATH SHER		GPS GALKOR SHALFA	LAM	GHE WATANG!		O A V.
	123	611	ASAD ULLAH		AMBO? KHAN		GPS KAMAR TALL		GHS WATALO		A.V./
	1 134	617	BAKHT ZAMIN		1						





DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION KHHYBER PAKHTUN KHAWA PESHAWAR.

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Notilication

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(ER)/EDI 20. No.SO(ER)/EDI 20. 22(F)/2010 dated 10.7.2012, the following CT, DM, AT, TT and PET (Male) are promoted to the point of Senior CT, Senior DM, Senior AT, Senior TT and Senior PET in HPS-16 (Rs.18910-1520-64510) respectively, plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and conditions given blow with immediate effect, and further they will be adjusted by the District Education Officer concerned.

HEM No.1. PROMOTION OF CT (BPS-15) MALE TO THE POST OF SCT (BPS-16) ON REGULAR S

11/212	•		-fp	
Total No of Vacant Post of SCT			<u> </u>	
Stare of SCT Promotion Quota		90		
	<u> </u>	100%		ı
Proposed CT for Promotion to SCT		77		1
				, .

								
	Sn #	Name (Officia	1	Name of School	Date of Birth	Date of Apptties Regular CT	Qual:	Remarks
	426	Hig	-	GMS Chinss Kot	7.11.1989	30.4.2014	MSc	Services are placed at disposal of DEO [M] Dir (Lower) for adjustment against the post of SCT In(875-14) on regular bash with immediate effect.
}	447			GHS Watangi	16.1.1905	30.4.2014	MA.	Services are placed at disposal of DCO (IA) Dir (Lower) for adjustment against the port of SCT in(DPS-16) on regular basis with immediate effect.
3	448	Rahn	nán Í	GNIS Kamal Khel Tat	15.3.1989	30.4,2014	MA	Services are placed at disposal of OLO (IA) Dir (Lower) for adjustment against the post of SCT in(8PS-16) on regular balls with immediate effect.
4	84	y Palist Mahi	ish-uri nan	GMS Karnal Kisel Tal		30.4.3014	MA	Services are placed at disposal of DED (SM) Dir (Lower) for adjustment against the post of SCT in(BPS-16) on regular basis with immediate effect.
5	45	tirA O	Ullah	GIAS AJoo Talash	5.31.1944	3043014	MA	Services are placed at disposal of DCO (M) Dir (Lower) for adjustment lagainst the post of SCT in(825-16) on vegular basis with inimediate effect.
1	4	il fela	n-ud-Di	n GMS Buchakal	20.3.1988			Services are placed at disposal of OEO (M) Oir (Lower) for adjustment against the post of SCT in(BPS-16) on regular basis with invertible effect.
	7 4	52 Bai	klist Patur	GMS Shor Khany	17.6.194	b		(ht) Dir (tower) for adjustment against the post of SCT In(825-16) on regular basis with immediate effect.
	8	i53 In:	ryat Ulli	ih GMS Und	17,4,198	,		the post of SCT in (225-16) on regict bash with immediate effect.
	9	454 2	akir Ulla	h GMS Gal Maldan	9.8.198	5 304.30	14 R.T	(M) Dir (Lower) for adjustment agains the post of SCI in(SPS-16) on tegul. basis with immediate effect.

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7 E				e rolli	ation of Sen	lor Tear	hers of District Dir Lower	2
3) P. L.	453	Waliced Zada	GHS Shal Kandi	10.5.1989	30.4.2014	MSc	Services are placed at disposal of DEO (IA) Dir (Lower) for adjustment against the post of SCT initipsates on the post of SCT initipsates on the post of SCT initipsates on the school of SCT initipsates of SCT initipsates of SCT initipsates of SCT initipsates on the school of SCT initipsates of	
11	45G	Muhammad Isror		2.5.1987	30.4.2014	DSc :	Services are placed at disposal of OCO (M) Dir (tower) for adjustment against the post of SCT in[up5:16] on activity	, ,
12	457	Majeed Ultah Khan	GHS Khan Abad	11.11.1988	30.4.2014	Msc	Services are placed at disposal of DEO (M) Dir (Lower) for adjustment against the post of SCT in(8PS-16) on services	
13	458	Mehmbod Ur flahman	GHS Badaln	1.3.1988	30.4.2014	MSc	Services are placed at disposal of OEO (I-1) Dir (Lower) for adjustment against the post of SCT In(BPS-16) on regular	
14	455	Irshad Melimood	GHS5 Tauda Cheena	2.4.1989	30.4.2014	MA	basis with immediate effect. Services are placed at disposal of DEO (M) Dir (Lower) for adjustment against the post of SCT in(BPS-16) on regular	
15	160	Muhammad Shahid	GHS tilmaz Kot	38.9.1986	30.4.2014	MA	basis with immediate effect. Services are placed at disposal of DEO [M] Dir (Lower) for adjustment against the post of SCT in[8PS-16] on regular basis with immediate effect.	
16	461	Mumtae Bakht	GHS Gul Muqam	4.2.1969	20.5.2014	MA	Services are placed at disposal of DEO (M) Dir (Lower) for adjustment against the post of SCT in(BPS-16) on regular basis with immediate effect.	!
1	462	Atta Ullah	TOP AND TOP	18.2.1968	19.7.2014	MA	Services are placed at disposal of DEO (34) Dir (Lower) for adjustment against the post of SCT In(8PS-16) on regular basis with Immediate effect.	
18		'	GHS Ashar Kor	15.7.1970	19.7.2014	MA	Services are placed at disposal of DEO (M) Dir (Lower) for adjustment against the post of SCT in(8PS-16) on regular basis with immediate effect.	
19	164	Naik Muhammad Khan	GHS Kaitan Dush Xhe	18.2.1965	19.7.2014	DA '	Services are placed at disposal of DEQ (M) Dir (Lower) for adjustment against the post of SCT in[BPS-36] on regular basis with immediate effect.	
20	465	Muhammad Rashid	GHS Ajoo	1.2.1964	19.7.2014	BA	Services are placed at disposal of DEO [M] Dir (Lower) for adjustment against the post of SCT In(BPS-16) on regular basis with immediate effect.	
21	467	Said (Auhammad Jan	GHS Ofteri Kambat	2.5.1969	19.7.2014	2/A	Services are placed at disposal of DEO [M] Dir (Lower) for adjustment against the post of SCT in(BPS-1G) on regular trasts with immediate affect.	
22	468	Abdul Dashir	GMS Tecrona Khadagaal	3.1[1967	19.7.2014	MA	Services are placed at disposal of DLO (M) Dir (tower) for adjustment against the post of SCT in(8PS-16) on regular balls with immediate effect. Services are placed at disposal of DLO	
23	469	Salim Ullah Khan	GHS Rank	7.2.1968	19.7.2014	MA	(M) Dir (tower) for adjustment against the post of SCT in(BPS-16) on regular basis with immediate effect.	
24	470) Eduttable Khan	GHS Shamsl Khan	4,4,1964	19.7.2014	9.4.4	the post of SCI in(SPS-16) on regular basis with immediate effect	
2!	5 47	Said Raman	GHS Shamsi Khan	16.7.1967	19.7.2014	MA	(A) Dir (Lower) for adjustment against the post of SCT in(BPS-16) on regular basis with immediate effect.	İ

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					l'ennu			Services are placed at disposal of DEO
	0	Saeed L Orullar		GHS Banda Talash	1,6,1964	19.7.2014		(M) Dir (Lower) for adjustment against the post of SCT in(GPS-1G) on regular basis with immediate effect. Services are placed at disposal of DEO
2	173	Abdult	aklim l	GHSS Khari Pur	10.5,1965		МА	(M) Dir (Lower) for edjustment against the post of SCT in(0PS:16) on regular basis with immediate effect. Services are placed at disposal of DEO
28	374	Fazi Ulta	h	GA15 Bambolal	B.4.1987		MA	(M) Dir (tower) for adjustment egainst the post of SCT in[BPS-16] on regular trass with immediate effect.
:9	175	Sher Zad	Ja	GKIS Gumbalal	1,4,1967	19,7,2014	A.A.	Services are placed at disposal of DEO [M] Dir (Lower) for adjustment against the post of SCT in(BPS-16) on regular basis with immediate effect.
30	176	Ktuhami Qasim	กลป	Kunibar GHS	4,2,1968	19.7.2014	MA	Services are placed at disposal of DEO (M) Dir (Lower) for adjustment against the post of SCT in(BPS-16) on regular basis with immediate effect.
131	277	Muhami Irshad	mad	GHSS Takworo	12.3.1969	19.7.2014	BA †	Services are placed at disposal of DEO (M) Dir (Lower) for adjustment against the post of SCT in[BPS-16] on regular basis with immediate effect.
32	478	Said Laid	Jan	GMS Arif	25.1.1971	19.7.2014	MA	Services are placed at disposal of DEO [fit] Dir (tower) for adjustment against the post of SCT in(BPS-16) on regular basis with immediate effect.
33	479	Badshah Jehan		GHSS Bagh Maidan	14.3.1969	19,7.2014	MA	Services are placed at disposal of DEO (M) Dir. (Lower) for adjustment against the post of SCT (n(BPS-16) on regular basis with immediate effect.
34	450	Lai Baha	dar,	GHS Takworo Sheikhan	15.8.1969	19.7.2014	BA	Services are placed at disposal of DEO (M) Die (Lower) for adjustment against the post of SCT in(BPS-16) on regular basis with immediate effect.
35	481	Ahmad .	Jan i	GHS Drangal	1.8.1965	19.7.2014	BA	Services are placed at disposal of DEO (IA) Dir (Lower) for adjustment against) the post of SCT in(BPS-16) on regular basis with immediate effect.
36	484	Bakht Ahmad		GHSS Seral Bala	1.4.1969	19.7.2014	MA	Services are placed at disposal of DEO (M) Dir (Lower) for adjustment against the post of SCT in[BPS-16) on regular basis with immediate effect.
37	485	Bakht R	news	GHSS Samar Bagh	12.12.1965	19.7.2014	AIA	Services are placed at disposal of DEO (M) Dir (Lower) for adjustment against the post of SCT in(DPS-16) on regular basis with immediate effect.
38	486	Muham Zamin K		GHS Safery Khall	1.4.1970	19.7.2014	BA	Services are placed at disposal of DEO (M) Dir (tower) for adjustment against the post of SCT in(BPS-16) on regular basis with immediate effect.
39	487	Misbah Rahman	•	GHS Pingal	31.12.1967	19.7.2014	BA	Services are placed at disposal of DEO (14) Dir (Lower) for adjustment against the post of SCT in(BPS-16) on regular basis with immediate effect.
40	488	Mehboo Ahmad	b	GMS Ganjia	10.2.1972	19.7.2014	MA	Services are placed at disposal of DEO (M) Dir (Lower) for adjustment against the post of SCT in(8PS-16) on regular basis with immediate effect.
41	489	Abduc R	4b	GHS Palto Dara	1.3.1972	19.7.2014	Ala	Services are placed at disposal of DEO (M) Dir (tower) for adjustment against the post of SCT in(BPS-16) on regular basis with immediate effect.

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	i					Prom	njilanjaf Sen	 or Teacl	iers of District Mir Lower
* ,	120	L ⁹ 1H	Saeco a	Gi	G Pingal	12.1.1968	19.7.2014	AL!	Services are placed at disposal of DEO (M) Dir (Lovrer) for adjustment against the post of SCT interestion on control
43	101	Anni	amniviti	Gı	15 Orola)	1,10,1768	19.7.2014	na	Services are placed at disposal of DEO [In] Dir (Lower) for adjustment against line post of SCT In(DPS-16) on regular
11	193	fitul Razi	n	• •	is Shamul ion	14.4.19611	19.7.2014	IAA	Services are placed at disposal of DEO (MA). Dir (Lower) for adjustment against the post of SCT in[IIPS-10] on redular
135	493		hammai cd [1655 Joshdara	8.10.1971	19.7.2014	IMĀ	Services are placed at disposal of DEO (IA) Dir (Lower) for adjustment against the post of SCT In(0PS-16) on regular
	19		ful Bart	, S	ikalijaj	3.5.1972	19,7.2014	UA:	basis with immediate effect. Services are placed at disposal of DEO (IM) Dir (Lower) for adjustment against the post of SCT In(8PS-3G) on regular basis with immediate effect.
1 47	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	נא	dişmini cem	<u>'</u>	GMS ₂ Tamargara	11.3.1966	19.7.2014	MA	Services are placed at disposal of DEO (M) Dir (Lower) for adjustment against the post of SCT in(BPS-16) on regular basis with immediate effect.
			war Zel	- ·	GMS Tangl Samar Bagh	21.3.1969	19.7.2014	RIA	Services are placed at disposal of DEO (MI) Dir (Lower) for adjustment against the post of SCT in(BPS-16) on regular basis with immediate effect.
		j L	yan gepmoo	•	GMS Ghawara Danda	1.4.3966	19.7.2014	ВА	Services are placed at disposal of DEO (M) Dir (Lower) for adjustment against the post of SCT in(8PS-16) on regular basis with immediate effect.
			ehen Da hah		GHSS Khazana	10,4.1968	19.7.2014	BA	Services are placed at disposal of DEO (M) Dir (tower) (or adjustment against the post of SCT in[8PS-16) on regular basis with immediate effect.
1	53 1	500	Atta Uila	ili	GHS Osaha	1.3.1966	19.7.2014	I.(A	Services are placed at disposal of DEO (M) Dir (tower) for adjustment against the post of SCT in(8PS-18); on regular basis with immediate effect.
	23	501	Alumad '	Shah !	GHS Sad Di Xalay	or 1.1.1967 ·	19.7.2014	I MA	Services are placed at disposal of DEO (MI) Dir (Lower) for adjustment against the post of SCT in[DPS-16] on regular basis with immediate effect.
	53	502	Rahmai Ullah Ja	,	GHS Kumbur	5,7,1967	19.7.201	8 DA	Services are placed at disposit of DEO (Al) Dir (Lower) for adjustment against the post of SCT in(BPS-16) on regular backs with kismediate effect.
	54	503	Lol Muhair	mud	GIAS Surk Dheri	h 30,8.1966	19.7.201	4 MA	Services are placed at disposal of DEQ (M) Dir (tower) for adjustment against the post of SCT in(BPS-16) on regular basis with immediate effect.
	55	501	Muhan	hmad	GPAS AJOC	28.10.19	67 19.7.201	NA NA	Services are placed at disposal of DEO (NI) Dir (Lower) for adjustment against the post of SCT in(BPS-16) on regular basis with immediate effect.
	56	505	Multan Hayat	4. 1	GMS Sara Payeen	4.4.1971	19.7.20	14 NIA	Services are placed at disposal of DEO (IA) Dir (Lower) for adjustment against the post of SET in(0PS-16) on regular basis with immediate offect.
	57	506	(bsan)	llah	GMS Bak Biland	ht 11.4.193	19.7.20	114 MA	(ht) Dir (tower) for adjustment against the post of SCT in(BPS-16) on regular basis with immediate effect.

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1		1.3 (t)	Gal			AtA	Services are placed at disposal of DEO (1.1) the (Lower) for adjustment against the post of SCI in(OPS-16) on regular basis with immediate of
50	J 84	Schullah	Glds "	12 9.1972 1	772014	MA	
	.]	•			-	ļ	Services are placed at disposal of DEO
30	A P	baj Khan	Giás khản	or and an annual of	injudencydop da bi an da i Lidi di Biller		traits with immediate affect
•	1	, 	Mail	S:1768 1	2 1 1014	MA	Selvices are Discord to discount to
							the past of SCI interpretation of the second
51	IO Ā	qal khan	GUS Stidwa	(*). (9). (************************************	19.7.2014	MA	Than will kinuddiffe #ffett
	•	1				,	Serekes are present at disposal of DEO (IA) (IA) (IA) (IA) (IA)
, 5	11 1	maed VIIAN	and a second contract of the second contract	halifer an and Maries 		,	the post of SCT in[APS-15] on regular basis with immediate effect.
Ť)	GHS OLALAI	15.4 1971	19.7,2014	IAA	services are placed of disposal of DIO
,	}	ţ					(M) Dir (Lawer) for adjustment against the post of SCT in(895:15) on regular
} •	1	populati	GIISS NIVIII	18.4.1972	19.7.2014	7.UA	ways with immediate effect
		(amun)		'		1	Services are placed at disposal of DEO (IA) Dir (Lower) for adjustment against
	!	. !					The post of SCT in(895-15) on regular
.	23	Fazal Subhai	n GCMMS Timargara	18.9.1972	19.7.2014	MA	Services are placed at disposal of DEO
*	b de la	I ^r			ľ		[M] Dir [Lower] for adjustment against
65	514	Muhammac	GMS Kotkay	16,1.1973	10 2 201		the post of SCT In(BPS-16) on regular basis with immediate effect.
	,	Asiam	Paikhel	10,1.19/3	19.7.2014	h.u.	Services are placed at disposal of 050 (Ini) Dir (tower) for adjustment against (
i					 5		Ine post of SCT in(805-16) on regular !
5 5	515	Muhamma Waris		4.2.1970	19.7.2014	MA	Services are placed at diaposal of DEO
}	,		Talash				[111] Dir (Lower) for adjustment againse f
67	516	Rahmat Jai	n GHSS		,		the post of SCT in(BPS-16) on regular, basis with immediate effect.
1			Khazana	18.2.1972	19.7.2014	BA	Services are placed at disposal of DEO (In) Dir (Lower) for adjustment against
Ì					1		ine post of SCT in(BPS-16) on regular
68	517	1 -, -	GHS Ashar	10.4,1971	19.7.2014	MA	basis with immediate effect. Services are placed at disposal of OEO
•	1	Kalunan	Kor				[M] Dir (Lower) for adjustment assinst
/.b	518	Shawlar	in Gras Walon	 -	_		the post of SCT in(8PS-16) on regular basis with immediate effect.
0,	112	3110 977,817	Tangi	12.12.1971	19.7.2014	0A	Services are placed at disposal of DEO (hi) Oir (tower) for adjustment against
	\						the post of SCT in[BPS-16] on regular
70	519	Julian Zet	GIIS Buyari	7.1.1968	19.7.2014	NIA	Services are placed at disposal of OCO
							[M] Dir (tower) für adjustment against
	-						the post of SCT in(BP\$-16) on regular basis with immediate effect.
71	520	اللَّا فَاقِمَالًا ۗ ا	afii GSSHSS Outle	1.3.1968	19.7.201	4 UA	Services are placed at disposal of DEO (81) Dir (tower) for adjustment against
							the post of SCT In(BPS-36) on regular
72	52	Haropnic	ir- OMS Cluki	NO 3.4.1966	19.7.301	4 BA	Services are placed at disposal of DEC
		Rushid					[M] Dir (Lower) for adjustment agains
		, j					the post of SCT in(OPS-16) on regula basis with immediate effect.
73	52	11 (GHS	5,4,1966	19,7.20	14 134	Services are placed at disposal of DE
		lhsan	. Dalamat				(M) Dir (Lower) for adjustment against the post of SCT in(8PS-16) on regula
		ļ					batis with immediate effect.

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	723	bemmeduM	GHS Kohiray.	Pro	notion of Sci	olar Te	schers of District Dir Lower
		Yar Klish	, and the same of	44.9,1971	19.7.2014	ÜA	Services are placed at disposal of DEO
75	528	Sher Zaman	GHS Barjom	1.3.1971			the post of SCT in[GPS-16] on regular basis with immediate effect.
			Makhal	1,3.1971	19.7.2014	MA	Services are placed at disposal of DEO [M] Dir (tower) for adjustment leafnst the post of SCT in[BPS-16] on regular
76	525	Muhib Uliah	GHSS	20.3.1990	3010.00		The state of the s
77.	526		Hayaseri		20.10.2014	D\$	(M) Dir (Lower) for adjustment against the post of SCT initips-15) on tender
	340	Rahat Ullah	GHS	1.4.1987	20.10.2014	MSc	And Anth MUMORITIE Allect
			Ghwara Banda				Services are placed at disposal of UEO (IM) Oir (Lower) for adjustment against the post of SCT in[hPS-16] on regular basis with immediate effect.

TTEM No.2. PROMOTION OF DM (BPS-15) MALE TO THE POST OF SDM (BPS-16) ON REGULAR

Totalshada	\ \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
Total No. of Vacant Post of SDM Share of SDM Promotion Quota	03
Proposed DM far Promotion to SDM	100%
	03

-			1				
S#	Sn:	Name of Official	Name of School	Date of Disth	Pate of Appttras Regular OM	Quait	Remarks
1	87.	Dakht Eldar	Samar Bagh	1.7.1966	31.3.2002	BA, DM	Services are placed at disposal of DEO (A1) Dir (tower) for adjustment against the post of SDM in(8PS-16) on regular basis with immediate effect.
2	88	Muhanima ledpl	d GM5 Soghall	6.7.1967	33.3.2002	BA, DIVI	Services are placed at disposal of DEO (IA) Dir (Lower) for adjustment against the post of SDM in(8PS-16) on regular basis with immediate effect.
3	90	talq Jan	GMS Kotkal Shahi Khail	2.5,1969	31.3.2002	DA, DH	Services are placed at disposal of DIO (M) Dir (Lower) for adjustment against the post of SDM in(BPS-18) on regular baths with immediate effect.

ITEM No.3. PROMOTION OF AT (BPS-15) MALE TO THE POST OF SAT (BPS-16) ON REGULAR BASIS

Total No. of Vacant Post of SAT	03
Share of SAT Promotion Quota	100%
Proposed AT for Promotion to SAT	03

5#	Sn #	Name of Officia	Name of School	Date of Birth	Date of Applit; as Regular AT	Quali	Remarks
1	125	Issa Muhammad	GMS Kamal Khel Tal	5,2,1964	1.10.2004	MA Arabi, B.Ed, ! S.Alamia	Services are placed at disposal of DEO (M) Dir (Lower) for adjustment against the post of SAT in(BPS-16) on regular basis with inunediate effect.
2	126	Muhammad Jamshed	GMS Khal Barkalay	4,6.1974	29.9.2004	MA Arabi, S.Alamia	Services are placed at disposal of DEO (NI) Dir (Lower) for adjustment against the post of SAT in(BPS-16) on regular bosis with immediate effect.
3	127	Ghani Rehman	GMS Kamar Tal	10,4.1974	1,10,2004	FAA 11: S.Alamia, B.Ed	Services are placed at disposal of OCO (M) Dir (Lower) for adjustment against the post of SAT in(BPS-16) on regular basis with immediate effect.

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total tipes Verset Price et 171 share of its Promotion Queta Proposed 11 for Promotion to \$11 Name of Mame of Date of Officiat 1 Dust. School Birth . Apatt: 31 Regular 11 Hally rate GHL 10 1,1217 111702 ** A. Secretary are placed of disposal of OTO Makian & Almia (No linear) for especiment econs Bld the post of STE initiation on regular PROMOTIONOR beis with immediate effect. PET (IPS 48) MALE TO THE POST OF SPET (IPS-16) ON REGULAR

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Total tip of Vacant Post of PET	
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ATTENDED AND ADDRESS OF MALE AND ADDRESS OF	The state of the s
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22	Sn c	Official	Name at School	Date of Birth	Date of Approximate Approximat	Qual:	The Part 1
•	The was a consideration to the same of the	Abdul Wallid	SMS Ashar	15 8.1969	10.12.1533	8 A, 8.Ed	Services are placed at disposal of DED (47). Dir (Lower) for adjustment against the post of SPET in(825-15) on regular basis with immediate effect.

Terms and Conditions:-

They would be on probation for a period of one year extendable for another one year.

They will be governed by such rules and regulations as may be issued from time to time by the Gove.

Their services can be terminated at any time, in case their performance is found 1 unsuthfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.

· Charge report should be submitted to all concerned.

Their Inter-Se- seniority on lower post will remain intact.

No TA/DA is allowed for joining their duty.

They will give an under taking to be recorded in their service books to the effect that if any over payment is made to them in the light of this order will be recovered and if they are wrongly promoted they will be reversed.

Infore hunding over charge their documents may be checked. If they have not the required relevant qualifications as per rules, they may not be handed over charge of the post

(Haffe He. Mahammad Hrahlm)

Director

Elementary and Secondary Education Khyler Pakhtunkhwa Peshawar

Endst: No. 2-783-89 / Itte Na I/Promotion (II-still hired Ivahawar the 25/2) Copy forwarded for information and necessary action to the: .

1. Accountant General Khyber Publitudhan Perhauter.

2. District Education Officer (M) Die Lower

3. District Accounts Officer Dir Lower 4. Officials Concerned.

5. PS to the Secretary to Goet: Khyber Pakhtunkhwa ESSE Department.

6. PA to the Director E&Sti Khyber Pakhtunkhwa, Peshawar.

7. M/File

Dy Director (Eulab) Elementary and Secondary Education Khyber Pukhninkhiisa Pinhingar

Scanned with CamSca

ما س المراجولية الجولية البير ميرالد و) فارتولوا الجولية المسلاه المساليم أبي صلى المراق الماليم المراق المر - por the will be a position of the السيس مالي المعنى لبي بيس مالي هي . J. Theolowing of the Sund of him

الحسن منا سسسر الرئ ابردين حسر الحراب المرديين حسر الحراب المرديين 100-00 (17) الرسش کے تی ہے کہ سروح ، میکر سے لاآ۔ متعلميد سي مرمات لعو ٢٠٠ مشر الما) وعدما مد معلم سنار في لسام و مركام المان كرا والم Poly of the line of the poly o الع عسر الن الرار وم حالي Cil Charles 27 2020

مسئولات المحلين أمسرها ومراما ومرابل من المراه درخمانست ممرد مسسيه ينس سناري المسليمة الله أسائده مرة سال 2020 بالله المراب الموالي الم الاستيم من المحد من المرام المناسب المساول جينوس لبورس عن شجر " ميم مسلط مير كم ويكر أسشاره لم بسطات مسرس زبيرا بهام سندوس لن سرات نهدت سنامل درخوس دار وم الميم ما تو كر نعاد ميد الميد الميد الميدة الميدة الميدة المدين الميدا . هر المراد م 2020 در ار بع و مسال می است که بسیات در بنیاتی مزیری ار المريزات ما حساك مريث بي عرف ع مرج میران در فرست مام کوستاد مرت ر ع سام كوشندكره سي رفي للب مره المستان كرم جاي كرم عام كم على الم سارد فرماکی ما رحمد در ۱۵ مار ۱۵ مار ما ما

العدالت / وس الربيور الم و المعالث الم وطيع الكري بنام فيو متى وكس باعث تحريرا نكه الله الله مندرجه بالا میں اپنی طرف سے واسطے پیروی وجواب دہی و کل کاروائی الما مقام كروس لربيونل كيك كالما وي الرفروكيات بهر کرکے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل انتنیا به بوگار نیز وکیل صاحب کو راضی نامه وتقرر ثالث و فیصله بر حلف دینے جواب دی اورا قبال دعویٰ اور درخواست ہرتم کی تقیدیق زراس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برامدہوگی اور منسوخ ڈائر کرنے اپیل تگرانی و نظرانی و پیروی کرنے کا اختیار ہوگا۔ بصورت ضرورت مذکور کے نسل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شده کو بھی جملہ مذکورہ بالااختیارات حاصل ہونگے اور اسکا ساختہ برواخته منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ وہر جانہ التواہے مقدمہ کے سبب سے ہا گا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا وخرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہو یا حد سے باہر ہوتو وکیل صاحب پابند نہ ہو گئے کی پیروی مقدمہ ندکورالہذا وکالت نامہ لکھ دیا ک سندرہے کے العباد كواه شام كالعباد كواه شام كالمعال كالمعال كالمعال العباد كالمعال العباد كالمعال العباد كالمعال العباد كالمعال المعال المعالم ا

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 7219 /2020. Titled. Wal Rah Appellant.

VERSUS

1.	The Secretary (E&SE) Department Khyber Pakhtunkhwa	Respondent-1
2.	Director (E&SE) Khyber Pakhtunkhwa	Respondent-2
3.	District Education Officer (Male) Dir Lower	Respondent-3

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S.NO	Description of Documents	Annex	Pages
1	Para wise Comments		1-2
		-	

Spondent.

SEO(M)

DIK Lower

(5)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

SERVICE APPEAL NO. 7219/2021.

MR. Mati Ur Rahman CT

.....Appellant

VERSUS.

- 1. The Secretary Elementary and Secondary education Khyber Pakhtunkhwa Peshawar.
- 2. -The Director (Elementary & Secondary Education), Khyber Pakhtunkhwa Peshawar.
- 3. The District Education Officer (Male) Dir lower at Timergara.

(RESPONDENTS)

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS, 1,2,3

RESPECTFULLY SHEWETH:

PRELIMNARY OBJECTIONS:

- 1. The appellant is not an aggrieved person with the meaning of the Section 4 of Tribunal Act 1974.
- 2. The appellant has concealed the material fact from this Hon! Able Tribunal, hence liable to be dismissed.
- 3. The appellant has not approached this Honorable Tribunal with clean hands.
- 4. The appellant has filed the instant appeal on malafide motives.
- 5. The instant appeal is against the prevailing laws & rules.
- 6. That the instant service appeal suffers from laches, hence not maintainable in the form.
- 7. The appellant has got no locus standi to file the instant appeal.
- 8. The instant appeal is frivolous, besides being time bard.

ON FACT:

- 1. Para No.1 of the facts pertains to the appellant's appointment and record hence need no comments.
- 2. Para-2 also correct, in detail it is submitted that the respondent No.4 to 19 were appointed as CT BPS-15 by respondent No.3 on adhock/contract bases and later on they were regularized through Regularization Act 2017.
- 3. Para-3 of the facts is correct to the extent of the relevant rules for the promotion from the post of CT (B-15) to SCT (B-16), it is also pertinent to mention here that respondent No.4 to 19 were appointed in the year 2014 and regularized in 2017 as per section 3 of the Act ibid, from the date of first appointment, so fulfilling five years of service they all were promoted as per law and rules whereas the appellant was promoted to CT post vide order dated 26/08/2017, so due to laps of tenure the appellant was not considered for promotion to SCT (B-16).

The seniority inter-se of those employees, whose services are regularized under this Act within the cadre, shall be determined based on their continues service in cadre.

- 4. Incorrect, this pera of the facts pertain to record and subject to proof, further more details has also been submitted in the above paras.
- 5. Detail reply has been submitted in the above para.

GROUNDS:-

- A. Incorrect hence denied, the respondent always follow rules and policies in letter and spirit. The appellant were not eligible for promotion and no any case of the CT teacher was submitted by respondent No.3 to Directorate for promotion as they all did not completed their their length of service i.e 5 years.
- B. Incorrect hence denied, the appellant has been treated as per law and rules. Detaille reply given in the preceding paras.
- C. Incorrect, hence denied.

It is therefore, humbly prayed that on acceptance of the above submission, the instant Service appeal may very graciously be dismissed in favor of the answering respondents with cost.

SECRETARY

GOVT: KHYBER PUKHTOON KHWA

ELEMENTRY AND SECONDARY DEPARMENT

(Respondent No.1)

DIRECTOR

ELEMENTRY & SECODARY

EDUCATION KHYBER PAKHTOON KHWA

(Respondent No.2)

DISTRICT EDUCATION OFFICER (M)

DIR LOWER AT TIMERGARA (Respondent No.3)