- 1st Nov., 2022 01. Counsel for the appellant present. Mr. Kabirullah Khattak, alongwith Mr. Muhammad Usman, ADEO (Litigation) for the official respondents present.
 - 02. Learned counsel for the appellant requested for withdrawal of the appeal on the ground that grievance of the appellant has been redressed. Dismissed as withdrawn. 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.

Fareeha Paul) Member (E)

(Kalim Arshad Khan) Chairman

·fr

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 spellant 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)

Chairman

Junior to counsel for the appellant. Mr. Kabirullah 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 granted to 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 notices, positively. the written receipt 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

Appellant Deposited ti Security & Process Fee

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.

Charman

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		<u>'</u>
Case No	/2020	

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			arguments on office objection before S.B.
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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:

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

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

Through

Date: 24/08/2020

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 2504 /S.T. Dt. 13-8 /2020.

> SERVICE TRIBUNAL PESHAWAR.

Mr.Shamsul Hadi Advocate, Swat.

esirbritted after

Regimonents Needed

24-8-20 That the be genionily list was not frow deel to the appendix by the defantment that subs the Said best was not gamered and
for the more there is no legal bor to bear to Said appeal before the
se nionly in one and in the same as lead.

Se nionly in one and in the same as feet of the Said appeal before the

st is therefore the regard to fish/fut of the Said appeals before the

court frithernal to meet the end of Justice Re-submitteel

The appeal of Mr. Nasar Khan C.T GMS Andehri 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. 1306 JS.T,
Dt. 23-06 J2020.

SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Majeedullah Adv. District Court Dir Lower.

Respected Sir

It is requested that the requisite documents as per order doded 23-6-2020.

Could not be record thankene It is regreshed that time be Extended for Complance.

4 24

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR.

Service Appeal No	/2020.	,
•	· .	
Nasar Khan (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:25.02.20ねという	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

Appellant

Through

Shams ut 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. 7233 /2020

Mr. Nasar Khan S/O Alam Khan

Certified Teacher (BPS-15), GMS Andhery Dir Lower KPAPPELLANT

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 Segistrar 33/6/2020,

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.

Khyber Pakhtukhwa Service Tribunal

23/6/2

EFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR.

Service Appeal No. **7233** /2020.

Nasar Khan (CT)

Presently posted at GMS Khanabad Dir Lower

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

VERSUS

- & Secondary Education Pakhtunkhwa, Elementary 1. Director. 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.

Inayatullah (C.T) 10.

Presently posted at GHS Darmal Payan ,Dir lower.

Zakirullah (C.T) 11.

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.
- 17. 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 SENIORITY THROUGH ASIDE AND IMPUGNED LIST NO.4 TO 19 WERE PALCED SENIOR FROM RESPONDENTS 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.
- 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:25.02.2012) 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;25.02.2019, 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.

Appellant

Through

Shams ul Hadi

Advocate, Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR.

Service Appeal No/2020.	
Nasar Khan (CT)	Appellant.
VERSUS	
Director, E&S Education Pakhtunkhwa	Respondents

AFFIDAVIT

I, Shams ul Hadi, Advocate, Peshawar do hereby as per 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 Court.

DEPONENT

EFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR. Service Appeal No. /2020.

Nasar Khan (CT)Appellant.

VERSUS

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

ADDRESSES OF THE PARTIES

APPELLANT:

Nasar Khan (CT)

Presently posted at GMS Khanabad Dir Lower

R/O Village Miskinai, 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) Presently posted at GHS Sia Warghar, Dir lower.
- 9. Bakht Munir (C.T) Presently posted at GHSS RehanPur, Dir lower.
- Inavatullah (C.T) 10. Presently posted at GHS Darmal Payan ,Dir lower.
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- Waheed Zada (C.T) 12. Presently posted at GHS GHSS Munda, Dir lower.
- Muhammad Israr (C.T) 13. Presently posted at GHS Makhai ,Dir lower.
- Majidullah Khan (C.T) 14. Presently posted at GHSS Lal Qila ,Dir lower.
- Mehmood Ur Rehman (C.T) 15. Presently posted at GHS Sadbar Kalay ,Dir lower.
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- 18. Mujeebullah(C.T) Presently posted at GHSS Haya Serai ,Dir lower.
- 19. Rahatullah (C.T) Presently posted at GHSS Kambat ,Dir lower

Through

Shams ul Hadi Advocate.

UPAL 034369968 In continuation of this office order No.5996-99 dated 17.14.95, NO. 1685-94 dated 30.5.96, NO. 1699-1700 dated 30.5.96, NO. 6000-6003 dated 17.12.95, No.954-65 dated 1.4.96 and No.4196-98 dated 29.10.95, adjustment of the following PTC, teachers are hereby ordered in the schools Egginuknesk noted against each with effect from 1.11.96. School Where adjus- Remerks. SNO. Hame of Teacher. ted tuessassassususes Shah Jee Mond Pro States, Obokhovar Against vacant post. (Uhaheed) 🚉 i. Shnai Shahtoot. Hohaumad Xikiyez, -d0-Bahadar Zeb," . . Khushmoqam Thall NO.2 -d0-Hamayoon, PTC. GPs, Ghanshal (P) -d0i.Ghanohal(P) Taj Bilond PTC. 6. . Kuga Wala. ÷d0− , Liagat Ali, PCC. , llawardoshii. Vice Momin Khan PTC Tajamul Shah, PTC, proceeded on leave. Toran, J. Bagh. Vice Noor Zada, PTC Mohd Fayaz. 9. proceeded on leave. against vacant post. a. Nasar Ranguly 10. Hold Imran PTC. -d0-1.-00-11. Nizamud Din. Prc. . Barkstni Khal. vice Zaiwarullah, PTC, 12. Mohammad Fayne," proceeded on leave. against vacant post. : . Kurhatan, 13. Mohammad Nasim, PTC, 🕒 . 10-24. - 40- 17 dille -d0- · · · 14. Rold Asghar, Pro; -d0-. r. Kuga Waluas 15. Jhah Zamin. -doo: Jalatui. 16. Sultan Ahmad, PTC, - 105-4: -do-17. Shah Lagan, PIC, if. Obokhawar Shaheed .- d0-18. Gul Bamid Jan," 19. Mohammed Parid," .: . Mirgam Karaker. Vice Noor Pohammad. 206 Nasar Khan," i. Hiskansi, 🦠 Vice Gran Badshah, PTC . 21. Niaz Ali, Pro, · :. Koti gram, Gib, Gato, Saral; 22. Gran Badshah, PTC, 13 :. Cato Sarul. Vice Niez All.PTC GP. Kotigram, Kolalano Shah(M) against vacant post. 23. Galim Khan, Pro. GP4, Cheragalai. -d0i. loora Chowandai. 24. Mian Sher, PTC, GPS,Juwzo(B) 25. Hohammad Hazir, Pro : . Fangui (Garra) --d0-TERMS AND CONDITIONS will be the name as already laid down in their ist appointment orders. 🧀 .. (FAZLI NAEEH KHAN) OTETT, EDUCATION OFFICER (H)

PHY: WR AT TIMERGARA.

PED/Estt:A-I Dated Timergara the / /2/96 1-4.411 33808 (M) in Distt: Dir.

5-29. The Tra: concerned.

DISTT: EDUCAS OFFICER(H) PRYIDIR AT TYMERGARA.



District Education Officer (M) Dir Lower



PH No. 0945-9250082.

OFFICE ORDER:

E-mail emisdirlower@yahoo.com

Consequent upon the recommendation of the District Selection/Promotion Committee Dir Lower in its meeting held on 18.06.2016 and in pursuance of Notification No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre Dated 13/11/2012 issued by the Govt Of KP (E&SE) Deptt: Peshawar and Notification No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre Dated 24/04/2013 issued by the Govt Of KP (E&SE) Deptt: Peshawar, the following PSHTs/SPSTs (Male) are hereby promoted to CT BPS-15 plus usual allowances as admissible to them under the rules in the schools noted against their names in the interest of public service with immediate effect.

S#	Seniority No	Name	Father Name	Name of GPS Where working	Proposed School	Remarks		
1	559	Khan Muhammad	Gul Muhammad	GPS Kamar Tangi	GHSS Asbanr	A.V.P		
2	755	Muhammad Israr	Mumtaz Khan	GPS Kass Kandaw	GHS Kadh	A.V.P		
3	803	Shah Muqadar Khan	Shah Zola Khan	GPS Mula Banda M,Kali	GHS Toor Qila	A.V.P		
4	856	Sarfaraz Khan	Muhammad Nawaz Khan	GPS Shekawlai	GHS Mian Kali	A.V.P		
5	943	Raz Muhammad	Khan Muhammad	GPS Asilo Banda	GMS Kumbar Maidan	A.V.P		
6	946	Riaz Ul Haq	Ahmad	GPS Danda Rabat	GHS Safary Khall	A.V.P		
7	947	Zia Ullah	Muhammad Irshad	GPS Ouch Gharbi	GHS Sia Warghar	A.V.P		
8	960	Muhammad Alim Bacha	Fazal Alim	GPS Ghaligay	GMS Kumbar Asbnr	A.V.P		
9	970	Rahman Ghani	Hazrat Nabi	GPS Darbar	GMS Lalko	A.V.P		
10	973	Riaz Hussain	Fazal Ghafoor	GPS Nakhtaro Koto	GHS Lajbook	A.V.P		
11	975	Abdur Rahman	Rahmat Jan	GPS Kotigram No. 1	GMS Razagram	A.V.P		
12	978	Muhammad Rasool	Nawshad Khan	GPS Gumbat Talash	GMS Sher Khani	A.V.P		
13	1015	Rafiq Ahmad	Sher Muhammad	GPS Sehsada	GHS Darmal Bala	A.V.P		
14	. 1071	Mihrabud Din .	Shahabuddin	GPS Kambat No. 1	GHS Kambat	A.V.P		
15	1079	Liaqat Ali	Sher Afzal	GPS Ali Mast	GMS Arif	A.V.P		
16	1091	Anwar Khan	Said Ullah Khan	GPS Mian Kalai	GHSS Mayar (J)	A.V.P		
17 \	1095	Nasar Khan	Alam Khan	GPS Thrai No.2	GMS Khan Abad	A.V.P		
18	1098	Javed Iqbal	Muhammad Zahir Shah	GPS Maniyal No. 1	GHSS Manial	A.V.P		
19	1109	Rozi Khan	Jalat Khan	GPS Khalisa	GMS Kotkai (Sh)	A.V.P		
20	1145	Muhammad Perveez	Habib Ullah Khan	GPS Dowab Shalfalam	GHSS Luqman (B)	A.V.P		
21	1147	Muhammad Hussain	Nasib Jan	GPS Manogai	GHS Chinarkot	A.V.P		
22	1149	Muhammad Farooq Shah Dost Ali Jan		GPS Khazana	GHSS Samarbagh	A.V.P		
23	1158	Sabir Rahman	Aziz Ur Rahman	GPS Shahbekay	GHS Maidan Bandi	A.V.P		
24	1163	Fazal Maula	Fazal Mohomin	GPS Maniyal No. 1	GHSS Manial	A.V.P		
25	1168	Muhammad Hussain	Umar	GPS Beragam GHSS Zaimdara /A				

TERMS AND CONDITIONS:.

- 1. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 2. Their services shall be terminated at any time, in case their performance is found unsatisfactory. In case of misconduct, they shall be preceded under the rules framed from time to time.

- 3. NO TA/DA will be paid to them on joining the post.
- 4. Charge reports should be submitted to all concerned,
- 5. Drawing & Disbursing Officers concerned are directed to collect photo copies of their testimonials along with verification fees and submit the same to the office of the undersigned for further verification from the institutions concerned.
- 6. This order is issued, errors and omissions accepted, as a notice only.
- 7. 60 % candidates have been promoted from amongst the eligible PSHTs/SPSTs.
- 8. 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 some one is found wrongly promoted be will be reversed.
- 9. SDEOs (male) Samar Bagh and Timergara sub divisions are directed to relieve them of immwdiately and LPCs and Service books may be completed and haded over to them.

(Prof: Muhammad Uzair ALi)
District Education Officer (M)
District Dir Lower

Endst. No. 11327-60

Dated Timergara the 18/06/2016.

Copy of the above is forwarded to: .

- The Director (E&SE) Khuber Pakhtoon Khwa Peshawar.
- 2. The District Accounts Officer Dir Lower.
- 3. SDEO (M) Timergara and Samarbaagh.
- 4. All concerned ASDEOs (M).
- 5. The Superintendent (Secondary & Primary) Estb: Local Office.
- 6. The Principals / Headmaster of the institute concernd.
- 7. The Officails concerned.
- 8. Master file.

District Education Officer (M)

District Dir Lower



DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION KHHYBER PAKHTUN KHAWA PESHAWAR.



Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Klipber Pakhtunkhwa Elementary and Secundary Education Notification No.SO(ERVED 10-22(F)2010 dated 10.7.2012, the following CT, DM, AT, TT and PEF (Male) are promoted to the posts of Senior CT, Senior DM, Senior AT, Senior TT and Senior PET in HPS-16 (Rx.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 I docation Officer concerned.

TIEM No.1. PROMOTION OF CT (HPS-15) MALE TO THE POST OF SCT (HPS-16) ON REGULAR

11/1515	
iotal Ne of Vacant Port of SCT	
Stare of SCT Promotion Quota	
Proposed CT for Promotion to SCT	100%
The state of the Francisco to SCT	77

	šn E	Officia		Sch	idol	Date of Birth	Date of Apptizes Regular CT	Qual:	R	emarks
	446	Haq		Ko		7.11.1949	30.4.2014	MSc		ervices are placed at disposal of DIO [M] Dir (Lower) for adjustment against the post of SCT in(875-16) on regular pasts with immediate effect.
?	. 447			W	is Istangi	16 1.1905	30.4.2014	AUA		lervices are placed at disposal of DEO (M) Dir (Lower) for adjustment against the post of SCT In(DPS-16) on regular bash with Immediate effect.
3	448	Rah	mån 	#0	AIS Kambi hel 1ai	15.1.1580	30 4,2014	MA	1	benikes are placed at disposal of OLO (IA) Dir (Lower) for adjustment against the post of SCT in(0FS-16) on regular basis with impediate effect.
1	441	· ·/·•	bah-uri man	"	shis Karisal Chel Tal	13.1990	30,4.2014	344		Services are placed at disposal of Dell (M) Dir (Lower) for adjustment against the post of SCT In(8P\$-16) on regular basis with immediate effect.
5	45	Jan	r Wilah		GMS Ajoo Talath	5.11.1984	104,2014	,		Services are pizzed at disposal of DCC (M) Dir. (Lower) for adjustment lagains the post of SCT in(892-16) on regula basis with immediate effect.
હ	45	1 (d)	in-ud-t	lin	GMS Buchakai	20.3.1984	30.4.2014		ì	Services are placed at disposal of DEI (M) Dir (Lower) for adjustment agains the post of SCT intEPS-16) on regulabatis with immediate effect.
7	4	52 84	àlist Pete	nir	GIAS Shor Khany	17.6.1947	e 2		ise i	Services are piaced at disposal of DE (ht) De (temer) for adjustment again the post of SCT in(8PS-16) on regul tunis with impostant effect.
	8 4	i53 Ir	ayat Ul	lah I	GMS Und	17.4.198			ise	Services are placed at disposal of Ot [M] Dir (Lower) for adjustment again the post of SCT In(RPS-16] on regul bash with immediate affect. Services are placed at disposal of D
1	9	454 2	akir Uti	ah !	GMS Gall Maldan	9,8.1985	30A.20	14	LToch	(NI) Dir (Lower) for adjustment again the post of SCT in(8PS-16) on regul basis with immediate effect.

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	į.					Pron	utlon of Sen	des er er	C
j	775	455	Walteed	1	GHS Shal	10.5.1989	30.4.2014		hers of Directed Dir Lower
		*	Cos		Kandi		30.4.2014	1.1Se	Services are placed at disposal of DEO (IA) Dir (Lower) for adjustment against the post of SCY in(BPS-16) on regular
ł	īī	456	Muham	mad	GMS Dhall	7.5.1987	30.4.2014	1	I was a server according to without
			israr				20:4:7014	DSC 1	Services are placed as element of the
1			í						(IA) Dir (Lower) for adjustment against the post of SCT in[0PS-16] on regular
	12	457	Majeed	Ululi	Glis Khan	11.11.198B	70.000		Ante Airti turuscaiyle ellect
			Khan		Vpaq	***********	30.4.2014	MSC	Services are placed at disposal of DEO (M) Dir (Lower) for adjustment against
					İ			1	the post of SCT in(BPS-16) on regular
1	13	458	Mehmb		GHS Badain	1.3.1985	30.4.2014	1	Dana with immediate effect.
į			Ur Ratu	nan			20.4.2014	MSc	Services are placed at disposal of DEO
1			ļ						(I-I) Dir (Lower) for adjustment against the post of SCT In(BPS-16) on regular
,	14	459	Inhad		GHSS Tauga	2.4.1989	30.4.2014		basis with immediate effect.
			Melimo	70वं	Cheena		30.4.2014	MA	Services are placed at disposal of DEO
	}	ļ ,			1		,	ı	(34) Oir (Lower) for adjustment against the post of SCT in(BPS-16) on regular
	15	460	Muhan	bemn	GHS Himaz	76.9.1986	30.4.2014		baus with immediate effect.
			Shahid		Kol	. 4.3.4 700	30.4.2014	MA	Services are placed at disposal of DEO
				1]				(M) Dir (Lower) for adjustment against the post of SCT in(8PS-16) on regular
	16	461	Mumta	26	GHS Gul	4.8.3969	20 - 20 - 2		basis with immediate effect.
	!	1	Bakht		Muqam	4.8.7303	20.5.2014	MA	Services are placed at disposal of DEO
	<u> </u>]		(M) Oir (Lower) for adjustment against the post of SCT in(BPS-16) on regular
	17	463	Alla U	llah	GHS AINH	10.2.1968	10.7.7.		basis with immediate effect.
	ļ.				Kor	10.2.1308	19.7.2014	MA	Services are placed at disposal of OLO
	,		,	ļ					(M) Dir (Lower) for adjustment against the post of SCT in(8PS-16) on regular
	18	463	Sluh f	Julian	GHS Ashar	15.7.1970	19.7.2014		basis with immediate effect.
	İ				Kor	13.7.1070	13.5.5014	MA	Services are placed at disposal of DED (I/A) Dir (Lower) for adjustment against
	ţ	1	,					. 1	the post of SCT in[8PS-16] on regular
	19	1 4 6 4	Naik	-	Glis Kaltan	18.2.1965	19.7.2014	DA '	basis with immediate effect.
	1		Muhai	nmad	Dush Khe		.,,,,,,,,,		Services are placed at disposal of DEO [M] Dir (Lower) for adjustment against
			Khan					İ	the post of SCT in[BPS-36] on regular
	20	465	Muhai	ntmad	DHS Ajoo	1.2.1964	19.7.2014	BA	basis with immediate effect. Services are placed at disposal of DEO
		1 7	Rashld	1				ו "ו	[M] Dir (tower) for adjustment against
		,		,	1		1	}	the post of SCT in(BPS-16) on regular
	21	467	Said		GHS Ofieri	2.5.1969	19.7.2014	I ASA	basis with immediate effect. Services are placed at disposal of DEO
	•	107	Muha	ហំកាន់ថ	Kambat	1,3,1,03			[M] Dir (Lower) for adjustment against
		İ	120	,	1			•	the post of SCT in(BPS-16) on regular basis with immediate effect.
	1	1	0 5 4 . 1	Dashir	GMS	3.1.1967	19.7.2014	MA	Services are placed at disposal of DEO
	22	468	NOBBI	nh suur	Teerona	2.1.1			[M] Dir (Lower) for adjustment against
			1	1	Khadagtal	1		1 !	the post of SCT in(DPS-16) on regular bails with immediate effect.
	-		(5)	1 10 - 3-	GHS Rank	7.2.1968	19.7.2014	MA	Services are placed at disposal of OCO
	23	469	Sallm Khan	Olian	una nam	7,2.1700		1	[M] Dir (tower) for adjustment against
									the post of SCT in(BPS-16) on regular basis with immediate effect.
	24	470	fidulta	1	GHS Shamsi	4.4.1964	19.7.2014	MA	Services are placed at disposal of DEO
	"	1770	Xhan	1111	Khan	1 3,3,134			(N1) Dir (Lower) for adjustment against the post of SCT in(SPS-16) on regular
					}				Land with Immediate effect
	-	1			GHS Shamsi	16.7.1967	19.7.2014	MA	Services are placed at disposal of DEO [MS] Oir [Lower] for adjustment against
	25	471) 7) 23 3 H	ក្រុងប	Khan	*******		1 1	the nost of SCT in(8PS-16) on regular
		1						1 1	basis with immediate effect.
			1 1		1.5			I	

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7			en - mingel legelikkeussunder kinsterfendere in die noorsteen mit als	11) tr1°1	iution of Seni	ur Ten	there be miner on would be
	6 17	Saeed U Grullar	GHS Banda Talash	1,6,1968	19.7.2014	7.14	Services are piaced at disposal of DEO (1-1) Dir (Lower) for adjustment against the post of SCT in(RPS-1G) on regular basis with immediate effect.
2	7 37	ABOUT HA	Kim G1855 Kisan Por	10.5,1965	19.7.2014	MA	Services are placed at disposal of DEO (M) Dir (Lower) for edjustment against the post of SCT in(BPS-16) on regular basis with immediate effect.
21	373	Fazi Ultah	GA15 Dambolal	3,4,1962	19.7.2014	MA	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.
:9	175	Sher Zada	GMS Gumbalal	1,4,1967	19,7,2014	MA	Services are placed at disposal of OLO [M] Dir (Lower) for adjustment against the post of SCT in(BPS-16) on regular basis with immediate effect.
30	176	Aluhamm Qasim	Kumbar	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(8PS-16) on regular basis with immediate effect.
31	277	Muhamm Irshad	Tahworo	12_3.1969	19.7.2014	ВА	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.
3:	478	Said Laiq	Jan GMS Arif	25.1_1971	19.7.2014	NA	Services are placed at disposal of DEO [1/1] Dir (Lower) 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 in(BPS-16) on regular basis with immediate effect.
34	450	tal Bahad	iar, GHS Takworo Sheikhan	15,8,1969	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.
35	481	Alimad Ja	on GHS Drangal	1.8.1965	19.7,2014	8.4	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.
36	484	Bakht Ahmad	GHSS Seral Bala	1.4.1969	19.7.2014	AAA ;	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 Ra	wan GHSS Samar Bagh	12.12.1945	19.7.2014	AMA	Services are placed at disposal of DEO (M) Dir (Lower) for adjustment against the post of SCT in(0PS-16) on regular basis with immediate effect.
38	486	Muhamn Zamin Kh		1.4.1970	19.7.2014	BA	Services are placed at disposal pf DEO (M) Dir (tower) for adjustment against the post of SCT in(BPS-16) on regular basis with immediate effect.
39	487	Misbah u Rahman	r-: GHS Pingal	31.12.1967	19.7.2014	BA	Services are placed at disposal of DEC (IA) Dir (Lower) for adjustment against the post of SCT in(BPS-16) on regular basis with immediate effect.
40	488	Mehboot Ahmad	GMS Ganjia	10.2.1972	19.7.2014	MA	Services are placed at disposal of DEC (M) Dir (Lower) for adjustment agains the post of SCT in(8PS-16) on regula basis with Immediate effect.
41	489	Abdut Ra	GHS Palto Dara	1.3.1972	19.7.2014	MA	Services are placed at disposal of DE (M) Dir (Lower) for adjustment again; the post of SCT in(BPS-16) on regulabatis with immediate effect.

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	J				* ******	Promi	tion of Senic	r Teac	here of District Dir Lower
3 45	X	(ash)	i ec	d a	GIUS Pingal			AL	Services are placed at disposal of DEO (M) Dir (Lovrer) for adjustment against the post of SCT interestion on territorial disposal of the post of SCT interestion on territorial disposal of the post of SCT interestion on territorial disposal of the school
3 4!		Amu Mub.		vq	GHS OPPEN	1,10,1269	19.7.2014	na (Services are placed at disposal of DEO [IA] Dir [Lower] for adjustment against the post of SCT in(DPS-16) on service
	92	fault Razir	ıil .		GHS Shamsi Ahan	14,4,17GH	12.7.2014	ian	trasts 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 trasts with immediate effect.
5 4	194	Muh	ul i		Chardara Cuss	8.10.1971		<u>ivý</u>	Services are placed at disposal of DEO [M] Dir (Lower) for adjustment against the post of SCT In[QPS-16] on regular basis with immediate effect.
	455		ul Ba	mad	Shaluai	3.5.1972	19.7.2014	UA ·	Services are placed at disposal of DEO (MA) Dir (Lower) for adjustment against the post of SCT In(8PS-2G) on regular basis with immediate effect.
		Nac	war 7	'	GMS, Tamargara GMS Tangl	21.3.1969	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.
. 49	19			,	Samar Bagh		-19.7.2014	AIA	Services are placed at disposal of DEO (M) Dir (Lower) for adjustment against the post of SCT (n(0PS-16) on regular basis with immediate effect.
50		M	iaù epun		Ghawara Danda	1.4.1966	19.7.2014	DA	Services are placed at disposal of DEO (M) Dir (Lower) for adjustment against the post of SCT in[BPS-I6] on regular basis with immediate effect.
		51	ia)i		Khezana	10,4,1968	19.7.2014	BA	Services are placed at disposal of DEO (NI) Dir (tower) (or adjustment against the post of SCT in(8PS-16) on regular basis with brimediate effect.
53			IIa U	liah	GHS Osaka	1.1.1966	19.7.2014	hta	Services are placed at disposal of DEO (AI) Dir (Lower) for adjustment against the post of SCT in(BPS-36), on regular basis with immediate effect.
57	\$1	01 A	amıl.	d Shal	GHS Said Di Katay	1,3.1967	19.7.2014	MA	Services are placed at disposal of DEC (M) Dir (Lower) for adjustment against the post of SCT in(BPS-16) on regular basis with immediate effect.
53	30		iahen Jilah	1	i GHS Kumbur	5.7.1967	19.7.2014	BA	Services are placed at disposal of DEC , (Al) Dir (Lower) for adjustment against the post of SCT in(DPS-16) on regular basis with immediate effect.
54	3	77 1 7	aļ Autra	nn/rta	GIAS Surkl Dheri	1 30,8.1968	19.7.2014	MA	Services are placed at disposal of DEC (M) Dir (tower) for adjustment agains the post of SCT in(BPS-16) on regula basis with insmediate effect.
55			llsar			,		MA	Services are placed at disposal of DEC [M] Dir (Lower) for adjustment agains the post of SCT In(DPS-16) on regular basis with immediate effect.
50			Muhi Hoya ;	i l	GMS Sara Payeen	4.4.1971	19.7.3014		Services are placed at disposal of DE (ht) Dir (tower) for adjustment again the post of SCT in(0PS-16) on regul basis with immediate offers.
5	?	506	lhsar	r Ulla	GMS Bak Biland	ht 11.4.1971	19,7,2014	MA	Services are placed at disposal of DE (Nt) Dir (Lower) for adjustment again the post of SCT in[0PS-16] on legul bash with immediate effect.

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, ,	•	1 1	san' :		Gai	1 1011011	19.7.2014	7.1A	Services 414 placed of disposal of DEO
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1.59	WV	,	ochill Schill		GMS	7.53		1	the post of SCE in(0p3-16) on regular.
ا إ			. "		Mandach	229.1977	17 7 1014	MA	basis with immediate effect
í }			1		.c.a.stufli	į	j		Services are placed at disposal of DEO
		·*•,,	er ann a	1	İ	1			
(0)	:5(19	1 A	pai d	יוגל)	Ghis khan	1 5:1768	17 1.7014		LI LILL TO A TOTAL PROPERTY OF THE A STRAIGHT A STRAIGH
1			1	i	V(rit)	73.170.0	13 1.3014	MA	Minical are Duced to discount of
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(1	510	· I) **********		~~~		1	The part of the leading to the second
		`\\	401 (1	ian	GIIS Showa	1.2.1922	19.7.2014.	MA I	bass will knumediate offect
	•				1			•	(fal) the (tower) for adjustment against
٠	•	1						1	The post of SCT (n(B) and the land
. 6:	51	111	maad	Ullah .	tins Oralat	15.4 1971	10 7 2014	·	- I want with numerists allect
	\	;				13.4 137	19.7,7014	MA :	pervices are placed at disposal of DEO
	•	1		į	1]	(In) Dir (Lower) für adjustment answert
67			Mari					1	the post of SCT in(BPS-15) on regular basis with immediate effect
٠.	1	• i	ama		GHSS KHOIL	18.4/1972	19.7.2014	1.1A	Services are placed at disposal of DEO
	1	•		,	Ì			• • •	(IA) Dir (tawer) for adjustment against
· •				1	}	ļ	1		ing post of SCT (n(8pS-15) on median
, 6:	53	13	Fa:21	Subhan	GCNIHS	18.9.1971	19.7.2014		i paris with immediate effect.
	t .				Timorgaça		13.7.2014	AM.	Services are placed at disposal of DEO
	1	1		1	,		1	1 1	[m] Dir (lower) for adjustment assigns)
69	-	1 -	1.1.11	mmad	# 1 A 2 11		<u> </u>	1	the post of SCT in[BPS-16] on regular basis with immediate effect.
	1	i	Astan		GN15 Kolkay Palkhel	16,1.1973	19.7.2014	MA	Services are placed at disposal of 050
	i	-			ABITUEL	1		1 1	(In) Oir (Lower) for adjustment against of
-	<u>i</u>].	1 1	ing post of SET in[895-16] on remark (C
5:	5 , 5	15		pennie	GHSS Zlaras	4.2.1970	19.7.2014	MAi	Daus with immediate effect.
	1	į	Wari	\$)	Talash		33	\.'''^}	Services are placed at diaposal of OEO
1	Ì	;	, 2	i		1	\	1 1	the post of SCT in(DPS-16) on regular
: 6	7 ; 5	16	Rahr	nat lan	GHSS	-	<u> </u>	1	basis with immediate effect.
i	1			1	Khazana	18.2.1972	19.7.2014	BA)	Services are placed as disposal of DEO
Į			1	ļ		l l		4 1	(M) Dir (Lower) for adjustment against
,	<u> </u>			!			\ .	1	the post of SCT in(8PS-18) on regular basis with immediate effect.
; 6	8 9	517)	id-ur	GHS Ashar	10.4,1971	19.7.2014	MA	Services are placed at disposal of O[O
:		,	Rah	งเกรา	Kor		, ,		(M) Dis (Lower) for adjustment against
		•	Ì	1,	l			1 1	the post of SCT in(8PS-16) on regular
17	69	518	Sha	PAZEIN	Oras Vialor	12.12.1971	10.33014		basis with immediate effect.
		1		1	Tangi	, 1	19.7.2014	0.A	Services are placed at disposal of DEO
1	1	ţ	İ	1]		1		the post of SCT information regular
	<u>.</u>			<u> </u>			_		basis with insmediate effect.
	70	5,19	Juli	an Zeb	GIIS Buyar	7.1.1768	19.7.7014	NIA	Services are placed at disposal of DCO
1	- 1					l		- { - }	(M) Die (Lower) für adjustment against
Ì	Ĭ		1			l l	1	1 1	the post of SCT kilaps is an regular
r	71	570	ÜL	aid Ullat	ii GSSIISS	1.3.1968	19.7.201	4 100	basis with immediate effect.
		T			Outh			ןייין י	Services are placed at disposal of DCO (61) Dir (tower) for adjustment against
1.	. 1	•		1		1			the post of SCT In(8PS-16) on regular
[:		_ا_	11	<u> </u>					basis with immodiate effect.
	72	521	· , -	ioņu-ai-	1	ю 3,4,1966	19.7.201	BA	Services are placed at disposal of DEO
1			Rat	shid	1		1		(NI) Dir (Lower) for adjustment against
l	}	i i	[]	[the post of SCT in(OPS-16) on regular.
Ì	73	57	<	amlm	GHS	£ 4 1000	10730		Services are placed at disposal of DED
ŀ		[[11	amun Lan	, uns Balamat	5.4,1966	19,7.201	14 DA	(M) Dir [tower] for adjustment against
ļ		Ш			. Oaming!	-	-1		the post of SCT in(BPS-16) on regular
		Ш	,		1	1]	basis with knmediate effect.
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7-1	£ 23	Pemmedany	GHS Kohlray	22.0.2024	notion of 2ct	ilor Ten	ichers of District Dir Lower
75		Yar Khan		44.9,1971	19.7.2014	BA	Services are placed at disposal of DCO (M) Dir (Lower) for adjustment against the post of SCT in(BPS-15) on regular basis with immediate at
13	524	Slier Zaman	GHS Barjam	1.3.1971	10.2.2.		
76	525	Multib Ullah	Makhal		19.7.2014	MA	(M) Dir (Lower) for adjustment against the post of SCT integrated
	1	1110 011311	GHSS	20.3.1990	20.10.2014	BS	
			Hayaseri				Services are placed at disposal of DE (M) Dir (Lower) for adjustment against the post of SCT In(0PS-16), on regulations
77	526	Hahat Ullah	GHS	1.4.1987		- I	basis with immediate effect.
			Ghwara Banda	12.1287	70.10.2014	MSc	Services are placed at disposal of DE (M) Dir (Lower) for adjustment against the post of SCT in[BPS-16] on regulabasis with immediate effect.

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

Total No. of Vacant Post of SDM	<u> </u>		
Share of SDM Promotion Quota	-	03	
Proposed DM for Promotion to SDM		100%	
The state of the s		03	
			· · · · · · · · · · · · · · · · · · ·

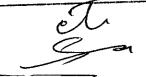
SI	Sn #	Name of Official	Name of School	Date of Disth	Date of Apptts as Regular DM	Quali	Remarks
1	87	Dakht tidar	GMS Tang) Samor Bagh	1.7.1966	31.3.2002	BA DM	Services are placed at disposal of DEO (NI) Dir (Lower) for adjustment against the post of SOM in[6PS-16] on regular basis with immediate effect.
	88	Muhammad Iqbal	GMS. Soghall	6.7.1967 ·	31.3.2002	BA, DIM	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 affect.
3	90	Laiq Jai	GMS Kotkal Shahi Khall	2.5,1969	31.3.2002	DA, DM	Services are placed at disposal of OLO (M) Dir (Lower) for adjustment against the post of SDM in(0PS-16) on regular basis with immediate effect.

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

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

S #	Sn:	Name of Officia	Name of School	Date of Dirth	Date of Appticas Regular AT	Quali	Remarks
1	125	Issa Muharnmad	GMS Komal Khol Tal	5,2.1964	1.10.200-1	Arabi, D.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 Arabl, S.Alamia	Services are placed at disposal of DEO [hi] Dir [Lower] for adjustment against the post of SAT in(BPS-1G) on regular bosts with immediate effect.
.3	127	Ghani Rehman	GMS Kamar Tal	10.4.1974	1,10,2004	fAA Is: S.Alamia, B.Ed	Services are placed at disposal of DCC [M] Dir (Lower) for adjustment agains the post of SAT in[8PS-16] on regula basis with immediate effect.

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l'enmotion of Senior Teachers of District Die Lamer

HEM SAA. PROMOTIOS OF TEMPSASIMALE TO THE POST OF STEMPSAGOS

, opotes	TT for Prome	tion to SST,	• August	Today committy hopes .	ne specialists in a state of the second of t	Special Section 2011 (1997) and the section of the	Hirad Duty byth Posterior
3n #	Name of Official	Name of School	Date of Risth	Date of Apatt: 34	Nusi	Remarks	ang mgalahan 1936-anang Hilip Managan Man Managan Managan Man Man Managan Managan Managan Man Man Ma Ma Ma Managan Ma Ma Ma Ma
145	tiet Utleh	GHS	10 1,150;	11 1 7027	S.A.	Services are placed at disposition the University of Principles	ו פי הי
ÉM N	.s. PRON	rivinatiini.	a Marie view model			the post of STT interplate of being with immediate offers. OF SPET (III) 16) ON RE	

the to the part part of the Share of Sigt Promoton Octobs 01 Proposed PLT for Promotion to SPLT ICON 01

. 54	e Official	Name of School	Date of Birth	Date of Appre as Regular PET	Qual;	Remarks
, where I	61 Radul Wahid	GMS Ashar	15 8.1969	10.12.1599	8 A, 8.Ed	Services are placed at disposal of DEO (U). Dir (Lower) for adjustment against the post of SPET in(8%-15) on regular pasts 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 unsatisfactory 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 received.

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

(Haffe Hr. Muhammad Ibrahim)

Director

Elementary and Secondary Education Khulwe Pakhtunkhwa Ivshawar

Ender: Na. 2-783-83 / Isle No I/Promotion (II-16) third IV shows the 25/2 | some Copy forwarded for information and necessary action to the: .

1. Accountant General Khyler Pallituallia a Policia ir. 2. District Education Officer (M) Dir Lower

3. District Accounts Officer the Louise 4. Officials Concerned

5. Is to the Secretary to Gove Khyber Pakhtunkhura E&SE Department.

6. PA to the Director ESSI Khyber Fakhtunkhua, Pediauar.

7. M/File

Du Director (Eulab) Elementary and Secondary Education Khuber Pakhtunkhua Pinhawar f

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Service of the servic Teld in indicate and and and and Jewer & Obsamble and war e biboning come and a comment Masas unan Jan

المحسن منا سيراك المردين المرد عرام المرابي و المرابي على المرابي الم متعلماً من بني مرمات لعوار م شيرسرانا) وعدما مد معلم سنارم لساف ی سنیا و در کارم المان کران کارور در کارور در کارور در کارور در کارور در کارور ک Regularion de componente de la ponnotation della ponnotation della ponnotation della ponnotation della ponnotation della ponnotation della ponnotation della ponnotation della ponnotation della ponnotation della ponnotation della ponnotation della ponnotation della ponnotation della ponnotation della ponnotation della ponnotation della ponnotation della 25 Joodo الع عسر الزر و م حر والسر الم ما ما ما حا حا C.I. Masas When 27 2020 et i

Aire Duil 8. المحالمة الم درخماسها بمراء لمستنبات ساري المسلامة الله اسانده مرة سان سالفالك السرارس من المناسب المام المستعدد المعالم المستعدد المستعدد المستعدد المراس والم المام المام المام المام المام المام المام المام المام المام المام المام المام المام المام المام المام المام الم المرازية المرازية المرازية المرازية المان مربع المعالم من المعالم المراز - ما حساس كا مربات ساع ے مرزی ملم مالی در طور میت مام کو مستعور مرت سر کے سام کرشدگرہ سنی رہی سب Date 16 07 2020 - 6 500

1786 مقدمه متدبع بالاعنوان بالاجس التي طرف سه واسط بيروى وجواب وجي وكل كارروائي صلدان القام موس ترمیز الکی کے فی الا المراول کا کال اختیار و ماک کا کال اختیار و کا کا کال اختیار و کا کا نتيز ويلى صاحب كوراضي نامه ومقرر رفائت وفيعله برحلف دينے جواب د ہى ادرا قبال دعوىٰ اور مصورت وگری کرانے اجراء اور وسون میک روید اور عرضی وعوی اور درخواست مرتم کی تقدیق زراس پردسخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم بیروی یا ڈ گری میطرف یا بیل کی میآ مدگی اور منسوخی دا ترکرنے اپلی مگرانی ونظر تانی دبیروی کرنے کا اختیار ہو گااور بصورت ضرورت مقدمه فركور كالى ياجزوى كارروائي كرواسط اوروكس يامخارقانوني كواسية امراه يا بى بجائة ركا ختيار الأكا ورصاحب مقرر شدة كويمي واى جمله فدكوره بالا اختیارات حاصل ہوں گے اوراس کا ساختہ پر داختہ منظور وقبول ہوگا اور دورانِ مقدمہ میں جوخر چہ وہر جاندالتوائے مقدم کے سبب سے ہوگا۔اس کے مستحق وکس صاحب موسوف موں کے نیز بقایا و رچری صولی کرنے کا جی اختیار موگا۔ اگر کوئی تاریخ بیٹی مقام دور ہر بوگا تھانہ ہاہر ہوتو وکیل صاحب یابتد ہول کے کہ بیر دی امتار سے زر کر بن البنداد کا لت نامہ الكورويا كرستدري e Hudi Adv ranser

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 72 33 /2020.

Titled. <u>Nasay Khan</u>. 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

Respondent.

DED (M)

DIK Lower

(15)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

SERVICE APPEAL NO. 7233/2021.

MR. Nasar Khan 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.

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)