

27<sup>th</sup> September, 2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Mr. Rasool Khan, ADEO for respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has not gone through the brief of the instant appeal. Adjourned. To come up for arguments on 25.10.2022 before the D.B at Camp Court D.I.Khan.



(Salah Ud Din)  
Member (Judicial)  
Camp Court D.I.Khan



(Kalim Arshad Khan)  
Chairman  
Camp Court D.I.Khan

25.10.2022

Appellant present through counsel.

Muhammad Jan, learned District Attorney alongwith Rasool Khan ADEO for respondents present.

Bench is incomplete, therefore, case is adjourned. To come up for arguments on 22.11.2022 before D.B at Camp Court, D.I Khan.



(Rozina Rehman)  
Member (J)  
Camp Court, D.I.Khan

24.01.2022

Tour is Cancelled, therefore, case is adjourned to

23.05.2022 for the same as before.

  
Reader.

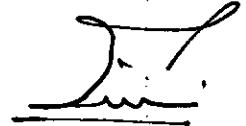
23.05.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Learned counsel for the appellant requested that similar nature Service Appeals bearing No. 822/2019, 16414/2020 & 506/2016 are fixed for arguments on 26.07.2022, therefore, the appeal in hand may also be fixed on the said date. Adjourned. To come up for arguments on 26.07.2022 before the D.B at Camp Court D.I.Khan.



(Rozina Rehman)  
Member (J)  
Camp Court D.I.Khan



(Salah-ud-Din)  
Member (J)  
Camp Court D.I.Khan

26/07/2022

Due to Summer vacation case

for 27/08/2022

  
Reader

15.12.2021

Counsel for appellant and Mr. Muhammad Adeel Butt, Additional Advocate General alongwith for the respondents present.

Learned counsel states that five other appeals involving common questions of law and facts with the present appeal are fixed for 24.01.2022. Let this appeal be fixed on the same date for hearing alongwith such other appeals before the D.B at camp court, D.I.Khan.



(Rozina Rehman)  
Member (J)  
Camp Court, D.I.Khan



Chairman  
Camp Court, D.I.Khan

25 .01.2021

Due to COVID 19, the case is adjourned to  
24 .03.2021 for the same as before.




Reaser


24.03.2021

Learned counsel for the appellant present. Mr. Muhammad Rasheed, Deputy District Attorney for the respondents present.

Former made a request for adjournment. Adjourned. To come up for arguments before D.B at Camp Court D.I.Khan on 26.07.2021.



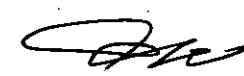
(MIAN MUHAMMAD)  
MEMBER (EXECUTIVE)  
CAMP COURT D.I.KHAN



(SALAH-UD-DIN)  
MEMBER (JUDICIAL)  
CAMP COURT D.I.KHAN

26.7.21

*Due to COVID-19, the case is adjourned  
to 28-10-21 for further.*



28.10.2021

Counsel for appellant present.

Muhammad Rasheed learned Deputy District Attorney Mehmood Azam ADEO (Litigation) for respondents present.

Former made a request for adjournment in order to prepare the brief.

Adjourned to 15.12.2021 before D.B at Camp Court, D.I.Khan.



(Atiq ur Rehman Wazir)  
Member (E)  
Camp Court, D.I.Khan

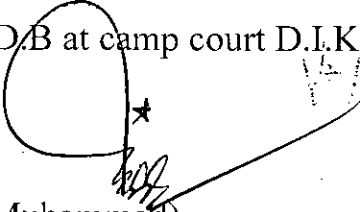


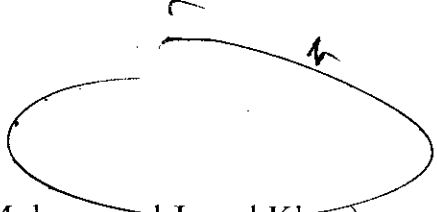
(Rozina Rehman)  
Member(J)  
Camp Court, D.I.Khan

26.10.2020

Assistant to counsel for the appellant is present. Mr. Usman Ghani, District Attorney alongwith Mr. Mehmood Azam, ADEO for respondents is present.

Since the Members of the High Court as well as of the District Bar Association D.I.Khan are observing strike today, therefore, the case is adjourned to 24.11.2020 for arguments before D/B at camp court D.I.Khan.

  
(Mian Muhammad)  
Member(E)

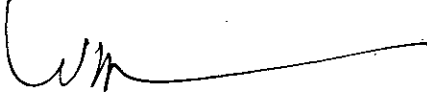
  
(Muhammad Jamal Khan)  
Member(J)  
Camp Court D.I Khan


24.11.2020

Appellant present through counsel.

Muhammad Jan learned Deputy District Attorney for respondents present.

Former made a request for adjournment. Adjourned. To come up for arguments on 25.01.2021 before D.B at Camp Court D.I.Khan.

  
(Atiq-ur-Rehman Wazir)  
Member (E)  
Camp Court, D.I Khan

  
(Rozina Rehman)  
Member (J)  
Camp Court, D.I Khan

Service Appeal No. 1221/2017

27.11.2019

Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for official respondents No. 1 to 4 present. None present on behalf of private respondents No. 5 & 6, therefore, notices be issued to them for attendance and arguments for 29.01.2020 before D.B at Camp Court D.I.Khan.

  
(Hussain Shah)

Member  
Camp Court D.I.Khan

  
(M. Amin Khan Kundi)

Member  
Camp Court D.I.Khan

29.01.2020.

Clerk of counsel for the appellant and Mr. Usman Ghani, District Attorney alongwith Mr. Mehmood Azam, ADO for official respondents present. Clerk of counsel for appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to general strike of the Khyber Pakhtunkhwa Bar Council. Adjourned to 26.02.2020 for arguments before D.B at Camp Court D.I.Khan.

  
(Hussain Shah)

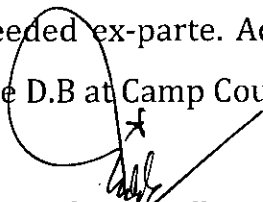
Member  
Camp Court D.I.Khan

  
(M. Amin Khan Kundi)


Member  
Camp Court D.I.Khan

26.02.2020

Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney alongwith Mr. Mehmood Azam, ADO for official respondents No. 1 to 4 present. None present on behalf of private respondents No. 5 & 6, therefore, they are proceeded ex-parte. Adjourned to 20.04.2020 for arguments before D.B at Camp Court D.I.Khan.

  
(Mian Mohammad)

Member  
Camp Court D.I.Khan

  
(M. Amin Khan Kundi)


Member  
Camp Court D.I.Khan

24.06.2019

Counsel for the appellant and Mr. Farhaj Sikandar, District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 26.08.2019 for arguments before D.B at Camp Court D.I.Khan.

  
(Hussain Shah)  
Member


Camp Court D.I.Khan

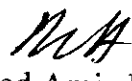
  
(Muhammad Amin Khan Kundi)  
Member

Camp Court D.I.Khan

26.08.2019

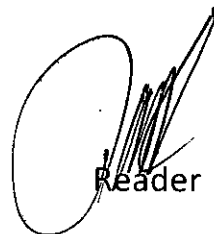
Counsel for the appellant and Mr. Farhaj Sikandar, District Attorney alongwith Mr. Mehmood Azam, ADO (Litigation) for official respondents No. 1 to 4 present. None present on behalf of private respondents No. 5 & 6 therefore, notices be issued to them for attendance. Learned counsel for the appellant also submitted rejoinder, which is placed on file. Adjourned to 21.10.2019 for arguments before D.B at Camp Court D.I.Khan.

  
(Hussain Shah)  
Member  
Camp Court D.I.Khan

  
(Muhammad Amin Khan Kundi)  
Member  
Camp Court D.I.Khan

22/10/2019


Since tour to D.I.Khan has been cancelled .To come for the same on 27/11/2019.

  
Reader

21.01.2019


Nemo for appellant. Mr. Farhaj Sikandar, District Attorney alongwith Mr. Mehmood Azam, ADO (Lit) for respondents present.


Due to general strike on the call of Khyber Pakhtunkhwa Bar Council instant matter is adjourned to 26.02.2019 for arguments before D.B at camp court, D.I.Khan.

  
Chairman  
Camp Court, D.I.Khan

26.02.2019

Learned counsel for the appellant present. Mr. Farhaj Sikandar, District Attorney alongwith Mr. Mehmood Azam, ADO for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 25.03.2019 before D.B at Camp Court D.I.Khan.


  
(M. Amin Khan Kundi)  
Member  
Camp Court D.I.Khan


  
(M. Hamid Mughal)  
Member  
Camp Court D.I.Khan

25.03.2019

Counsel for the appellant and Mr. Farhaj Sikandar, District Attorney alongwith Mr. Tahir Khan, SI for the respondents present.

The court time is over, therefore case adjourned to 24.06.2019 before the D.B at camp court, D.I.Khan.

  
Member

  
Chairman  
Camp Court, D.I.Khan



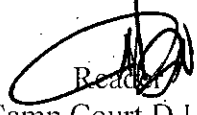
28.06.2018

Tour is hereby cancelled, Therefore the case is adjourned for the same on 30.07.2018 before S.B.

  
Reader  
Camp Court D.I Khan

30.07.2018

None present on behalf of the appellant. Tour is hereby cancelled. Therefore the Case is adjourned for the same on 12.09.2018 before S.B.

  
Reader  
Camp Court D.I Khan

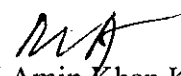
12.09.2018

12<sup>th</sup> September has been declared as public holiday on account of 1<sup>st</sup> Muharram therefore, the case is adjourned for the same on 27.11.2018 before S.B at Camp Court D.I.Khan.

  
Reader  
Camp Court D.I.Khan

27.11.2018

Counsel for the appellant present. Mr. Mehmood Azam, ADO alongwith Mr. Usman Ghani, District Attorney for respondents present. Written reply on behalf of respondents submitted, copy of the same is handed over the learned District Attorney. To come for rejoinder/arguments on 21.01.2019 before D.B at camp court D.I.Khan.

  
(M.Amin Khan Kundi)  
Member  
Camp Court D.I.Khan

Service Appeal No. 1221/2017

25.01.2018

Counsel for the appellant present. Mr. Usman Ghani, District Attorney alongwith Mr. Gul Nawaz, ADO for official respondents No. 1 to 4 and private respondent No. 6 in person also present. None present on behalf of private respondent No. 5 therefore, notice be issued to him for attendance and filing of written reply. Written reply on behalf of official respondents as well as private respondent No. 6 also not submitted. Requested for adjournment. Adjourned. To come up for written reply/comments on 15.03.2018 before S.B at Camp Court D.I.Khan.

*MA*  
(Muhammad Amin Khan Kundi)  
Member  
Camp Court D.I. Khan

15.03.2018

None for the appellant present. Mr. Ziaullah, DDA alongwith Mr. Mehmood Azam, ADO for respondents present. Written reply not submitted. Requested for adjournment. Adjourned. To come up for written reply on 28.06.2018 before S.B.

*\**  
(AHMAD HASSAN)  
MEMBER  
Camp Court D.I.Khan

30.06.2018

None for the appellant present. Mr. Ziaullah, DDA alongwith Mr. Mehmood Azam, ADO for respondents present. Written reply not submitted. Requested for adjournment. Adjourned. To come up for written reply on 28.06.2018 before S.B.


*\**  
(AHMAD HASSAN)  
MEMBER  
Camp Court D.I.Khan

30.11.2017

Counsel for the appellant present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was serving in Education Department as P.E.T. It was further contended that appellant and respondents No. 5 & 6 were appointed as Primary School Teacher on one and same date i.e 20.12.1999. It was further contended that as per appointment order, the merit marks of the appellant has been mentioned 47.94 while merit marks of private respondent No. 5 has been mentioned as 45.53 and merit marks of private respondent No. 6 has, been mentioned as 40.50 therefore, in the merit list the numbers/marks of the appellant is more than the private respondents No. 5 & 6. Hence, the respondents were required to place the name of the appellant senior to private respondents No. 5 & 6 but the respondents has illegally shown the name of the appellant at serial No. 22 and the name of private respondents 5 & 6 has been illegally shown at serial No. 20 & 21. It was further contended that the seniority list to the extent of the appellant is liable to be rectified and the appellant is entitled to be promoted before the private respondents No. 5 & 6.

The contention raised by the learned counsel for the appellant needs consideration. The appeal is admitted for regular hearing subject to deposit of security and process fee within 10 days thereafter, notice be issued to the respondents for written reply/comments for 25.01.2018 before S.B at Camp Court D.I.Khan.

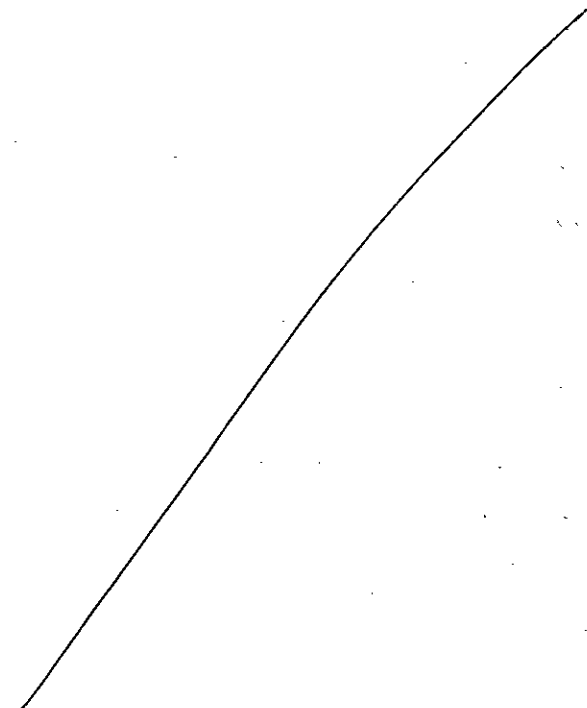
Appellant Deposited  
Security & Process Fee

  
(Muhammad Amin Khan Kundi)  
Member  
Camp Court D.I. Khan

Form-A  
FORM OF ORDERSHEET

Court of \_\_\_\_\_

Case No. 1221/2017


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	03/11/2017	<p>The appeal of Mr. Mujeeb-ur-Rehman resubmitted today by post through Sheikh Iftikhar-ul-Haq Advocate, may be entered in the Institution Register and put up to Worthy Chairman for proper order please.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR 3/11/17</p> <p>2-</p> <p>This case is entrusted to Touring S. Bench at D.I.Khan for preliminary hearing to be put up there on <u>30-11-17</u></p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p> 

The appeal of Mr. Mujeeb-ur-Rehman PET GHS Kirri Marwati son of Umer Daraz Resident of Mohalla Maidan Tank received today i.e. on 12.10.2017 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Addresses of respondent no. 5 and 6 are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Copy of seniority list is illegible which may be replaced by legible/better one.

No. 2235 /S.T.

Dt. 16/10/2017

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

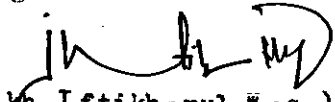
Shaikh Iftikharul Haq Adv.  
High Court D.I.Khan

Respected Sir,

Objection raised, have been removed.

- 1) Home Addresses of the Respondents No.5 & 6 is not traceable. The Addressess given through Care of Education Deptt:Distt:Tank is correct. As they employee of Distt:Education Tank.
- 2) Better/Eligible copy of Merit List is enclosed as directed by your honour.

Inconvenience so caused is regretted.

  
Shaikh Iftikharul Haq )  
Advocate High Court.

Dated. 28.10.2017

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

Service Appeal No. 1221/2017

Mujeeb Ur Rehman

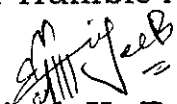
**VERSUS**

Govt; of KPK etc

**INDEX**

<b><u>S.NO</u></b>	<b><u>PARTICULARS</u></b>	<b><u>ANNEXURE</u></b>	<b><u>PAGE NO.</u></b>
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Your Humble Appellant

  
**Mujeeb Ur Rehman**  
Through Counsel

Dated: 10/10/2017

  
**Shaikh Iftikhar Ul Haq**  
Advocate High Court,  
Dera Ismail Khan.

0333-9983382

(1)

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

Service Appeal No. 1221 /2017

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1180

Dated 19-10-2017

**Mujeeb Ur Rehman** (P.E.T, GHS Kirri Marwati) S/o Umer Daraz, Resident of Mohallah Maidan, Tehsil & District Tank.

.....(Appellant)

**VERSUS**

1. Government of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Peshawar.

2. Director of Education (Elementary & Secondary) Khyber Pakhtunkhwa, Peshawar.

3. District Education Officer (Male) Tank.

4. District Accounts Officers, Tank.

5. Niaz Muhammad S/o Jan Muhammad R/o Razaq Colony, Tank C/o District Education Officer (Male) Tank

*Govt High School Bazai Teh + District Tank*

6. Muhammad Jamil S/o Ghulam Daud R/o Kot Murtaza, District Tank. *Govt High School Kot Khadiq*

*Teh & Dist Tank*

.....(Respondents)

**SERVICE APPEAL UNDER SECTION 4  
OF KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL ACT 1974.**

**PRAYER:-**

Filed to-day

*Qasim*  
Registrar

*12/10/17*

*lib Hay*

Re-submitted to -day  
and filed.

*Qasim*  
Registrar

*3/11/17*

**ON ACCEPTANCE OF INSTANT APPEAL  
THIS HONOURABLE TRIBUNAL BE  
PLEASED BY CORRECTING THE  
SENIORITY LIST THAT APPELLANT BE  
PLACED AT SERIAL NO. 20 INSTEAD  
SERIAL NO. 22 IN SENIORITY LIST AND  
THIS TRIBUNAL FURTHER BE PLEASED  
THAT APPELLANT ADJUSTED AS  
SENIOR P.E.T FROM THE DATED  
21/02/2013 INSTEAD OF 11/08/2016  
I.E ADJUSTED AS SENIOR P.E.T WITH  
ALL BACK BENEFITS.**

**Respectfully Sheweth:-**

Brief facts giving rise to instant appeal are as under:-

1- That appellant was appointed as P.E.T on 20/12/1999 along with their private respondents. Copy of appointment letters is enclosed as **Annexure "A"**.

2- That respondents authority issued the seniority list, wherein the appellant was placed at serial No. 22 instead of serial No. 20. Copy of seniority list is enclosed as **Annexure "B"**.

3- That thereafter the respondents authority adjusted the private respondents by posting the private respondents as Senior P.E.T on 21/02/2013, although the appellant being senior from the private respondents was also rightful for the post of Senior P.E.T from the date of 21/02/2013.

4- That thereafter the respondent authority adjusted the appellant against the vacant posts of Senior P.E.T vide Endst. No. 2850-56/ 2016 dated 11/08/2016. Copy of order is enclosed as **Annexure "C"**.

5- That the appellant feeling aggrieved from the continuous wrong submitted departmental appeal through proper channel on 16/06/2017 to the respondent authority vide Diary No. 621/16.06.2017. Copies of the Departmental authority are enclosed as **Annexure "D"**.

6- That the respondent authority despite expiry of statutory period the same has not been so far responded by the respondents. Thus the appellant feeling aggrieved, hence the instant service appeal on the following grounds:-

**GROUNDS:-**

a) Because as per policy, appellant is entitled for seniority because the appellant was appointed on open merit.




(3)

- b)** Because the appellant submitted prior arrival report from the private respondent.
- c)** Because valuable rights has accrued to appellant and the same can not be snatched.
- d)** Because neither the competent authority nor the departmental promotion committee case cross the parameters of service policy.
- e)** Because the seniority is right of appellant which has been withheld for no good reason.
- f)** That the Counsel of the Appellant may very graciously be allowed to add further grounds during the course of arguments.

***It is, therefore, humbly prayed that the instant appeal may be accepted as prayed for.***

Your Humble Appellant

  
**Mujeeb Ur Rehman**  
Through Counsel

Dated: /0/10/2017

  
**Shaikh Iftikhar Ul Haq**  
Advocate High Court,  
Dera Ismail Khan.

**AFFIDAVIT**

I, **Mujeeb Ur Rehman** (P.E.T, GHS Kirri Marwati) S/o Umer Daraz, Resident of Mohallah Maidan, Tehsil & District Tank, the appellant, do hereby solemnly affirm declared on oath that contents of the above **Appeal** are true and correct to the best of my knowledge and nothing has been concealed from this Honourable Tribunal.



  
**DEPONENT**

(4)

PET 3

Annexure  
A

OFFICE OF THE DIST. EDUCATION OFFICER (H.S.) SECONDARY TANK.

APPOINTMENT ORDER:-

Consequent upon the selection by the Departmental Selection Committee, the following PETs Candidates are hereby appointed in the schools noted against their names in BPS No. 109 1605-97-3060 plus usual allowances as admissible under the rules with immediate effect subject to the existing terms and conditions:-

S/No.	Name of Candidate/ Father's Name & address:-	Date of Birth.	No. of Merit/ Marks.	School where Appointed.	Remarks.
<u>OPEN MERIT @25%.</u>					
1.	Mujeeb-ur-Rehman S/O Umer Daraz r/o Moh: Maidan Tank City.	01.07.77	45.84	GMS, Kot Allah Dad.	Against vacant post.
2.	Niaz Muhammad S/O Jan Muhammad r/o Razaq Colony, Tank.	08.01.75	45.53	GMS, Cheena.	-do-
	/./././././././	/././././././	/././././././	/./././././.	/./././././

TERMS & CONDITIONS:-

1. They will be governed by such rules and regulation as may be prescribed by the Govt: from time to time for the category which they belong.
2. Their services will be liable to terminated on one month notice from either side. In case of resignation without notice one month pay will be forfeited in lieu thereof.
3. They should join the posts within one month of the issue of this order.
4. Their inter seniority will be determined in accordance with the merit of departmental selection committee.
5. Charge report should be submitted to all concerned.
6. They shall be on probation for a period of TWO, Years and will have to pass departmental examination. In case a candidate fails to qualify the Departmental examination he will be given one more chance. If he fails again then his services will be terminated. On arrival availability of trained teacher the service of untrained teacher occupies the post will be terminated.
7. Their original certificates/degrees should be checked & verified from the concerned university/B.I.S.E./D.B.S. and Islamic Madararas. Over their pay may not be drawn till the verification of documents.

Contd: on next page.2.

*Mujeeb*

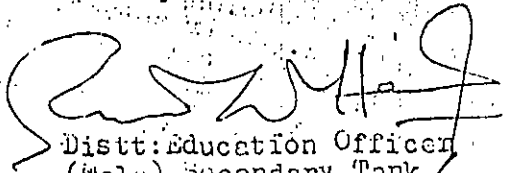
8. Service books of the teachers must be prepared complete in all respect after handing over charge.
9. The declaration of assets should be obtained from them immediately and placed on record.
10. They are required to produce health and age certificate from Medical Superintendent concerned before taking over the charge.
11. Charge should not be given to the over-age candidates. His case for relaxation is sent to the concerned quarter.
12. Efforts for transfer before the completion of tenure will disqualify him from the service.
13. NO TA/DA is allowed.
14. An undertaking shall be obtained from Master and Degree holders CI/DM/PET/AT/PT/Qari/Junior Clerk etc; that they will serve the department at least five years. Unless he is selected by the Public Service Commission in any post.
15. The age of candidate should not exceed 25/33 years and not below 18 years.
16. If any person make, appeal, the Department for his appointment, then service of Junior most will be terminated!
17. His service will be terminated if his Sanad/Certificate are found bogus at any time and action will be taken against him according to the rules.

Distt: EDUCATION OFFICER  
(Male) SECONDARY TANKI

Distt no. 6596-6601/II-I Dated Tank the 20/12 1999

Copy of the above is forwarded for information to the:-

1. Director Secondary Education NWFP, Peshawar.
2. District Accounts Officer, Tank
3. Principals/Headmasters GHS/GMS/GSS concerned.
4. Rs to Secretary to Govt: of NWFP, Education Department NWFP, Peshawar.
5. Candidates concerned.
6. Office Copy.

  
Distt: Education Officer  
(Male) Secondary Tanki

*Handwritten notes:*  
20/12/99  
20/12/99

6

PETs

OFFICE OF THE DISTRICT EDUCATION OFFICER (HABE) SECONDARY BANK

Notification Order:-

Consequent upon the selection by the Departmental Selection Committee, the following PETs Candidates are hereby appointed in the schools noted against their names in S.No. 09 (1605-97-3060) plus usual allowances as admissible under the rules with immediate effect subject to the existing terms and conditions:-

S/No.	Name of Candidate/ Father's Name & address:-	Date of Birth.	No. of Merit/ marks	School where Appointed	Remarks.
<u>MATCH-WISE/YEAR-WISE @75%</u>					
1.	Ikram Ullah S/O Rehmat Ullah r/o Vill: Ana Khel:-	12.04.76	36.72	GMS, Nourang (Batch: 1999).	Against vacant post.
2.	Sneed Akhtar S/O Gul Muhammad r/o Cara Buddah Tank.	04/06/75	43.16	GMS, Tator. (Batch, 1999).	-ac-
3.	Muhammad Nail S/O Ghulam Doud r/o Kot Murthaza Tank.	01.02.75	40.50	GMS, Raghza (Batch, 1999).	-ac-
	//////////		//////////		//////////

Terms & Conditions:-

1. They will be governed by such rules and regulations as may be prescribed by the Govt. from time to time for the category which they belong.
2. Their services will be liable to be terminated on one month notice from either side. In case of resignation without notice one month pay will be forfeited in lieu thereof.
3. They should join the posts within one month of the issue of this order.
4. Their inter seniority will be determined in accordance with the merit of departmental selection committee.
5. Charge Report should be submitted to all concerned.
6. They shall be on probation for a period of TWO Years and will be liable to pass departmental examination. In case a candidate fails to pass the examination, he will be given one more chance. If he fails to pass in the second attempt, he will be considered as unavailable for service. In case of service of candidates occupying the posts, they will be determined.
7. Their original certificates should be checked & verified from the concerned authorities/colleges and returned to them. However their pay may not be drawn till the verification is completed.

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7

8. Service books of the teachers must be prepared complete in all respect after handing over charge.
9. The declaration of assets should be obtained from them immediately and placed on record.
10. They are required to produce health and age certificate from medical superintendent concerned before taking over the charge.
11. Charge should not be given to the over-age candidates, his case for relaxation is sent to the concerned quarter.
12. Efforts for transfer before the completion of tenure will disqualify him from the service.
13. NO TA/DA is allowed.
14. An undertaking shall be obtained from Master and Degree holders CR/DM/FR/RT/TF/Junior Clerk etc; that they will serve the Department at least five years. Unless he is selected by the Public Service Commission in any post.
15. The age of candidate should not exceed 25/33 years and not below 18 years.
16. If any person makes appeal to the Department for his appointment, his service of Junior most will be terminated.
17. His service will be terminated if his Sanad/Certificate are cancelled at any time and action will be taken against him according to the rules.

DISTRIBUTION OFFICER  
(PILLS) SECONDARY TAUK

Distt no. 6602-7 / 10-1 Dated Taik the 27/11/1999

Copy of the above is forwarded for information to the

1. Director Secondary Education HAF, Peshawar,
2. District Accounts Officer, Taik
3. Principals/Headmasters GHS/GMS/GPS concerned,
4. As to Secretary to Govt. of State, Education Department HAF, Peshawar.
5. Candidate concerned.
6. Office Copy.

DISTRICT OFFICER  
(PILLS) SECONDARY TAUK

1-11-1999  
4-5-75  
27-11-99

Present

Jamil + GHS ROT Kaddak  
Niaz - GHS B9201

Seen  
[Signature]

OFFICE OF THE DISTRICT EDUCATION OFFICE (MALE) TANK

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GENERAL SENIORITY LIST OF P. E. T. TEACHERS (MALE)

S.No.	Name of Teacher	Father's Name	Acad:	Post	Place of Posting	BPS	Date of Birth	Date of Entry in Govt Service	Date of Apptt: in the present Post	Whether eligible for up-gradation	Remarks.
1.	Naseeb Khan	Wazir Khan	SSC	JDPE	GHS Gomal Bazar	12	15.6.1958	16.6.1976	16.6.1976		
2.	Abdul Majeed	Gul Mushmmad	FA	JDPE	GHS No.2 Tank	12	15.03.1956	25.4.1976	11.12.1978		
3.	Atta Ullah Jan	Noor Ul Islam	SSC	JDPE	GHS Daraki	12	10.01.1958	11.9.1981	11.9.1981		
4.	Muhammad Ghulam	Umar Khan	SSC	JDPE	GHS Kaka Khel	12	06.04.1953	22.10.1982	22.10.1982		
5.	Muhammad Ayub	Umar Khan	SSC	JFPE	GHS Umar Khel	12	30.1.1958	22.10.1982	22.10.1982		
6.	Saleem ullah	Aman Ullah	BA	JDPE	GHS Pai	15	25.12.1954	7.10.1985	7.10.1985		
7.	Akhtar Khan	Fazal Muhammad	BA	JDPE	GHS Naurang	15	10.12.1964	20.10.1966	20.10.1966		
8.	Ghulam Jan	Sahib Jan	MA	JDPE	GMS Adda Umar	15	24.5.1958	01.12.1988	01.12.1988		
9.	Muhammad Nawaz	Muhammad Ayaz	M.SC	B.Ed	GHS Ranwal	15	05.05.1962	01.02.1979	06.12.1988		
10.	Jahangir Khan	Said Hassan	M.Sc	JDPE	GHS Shaikh Uttar	15	15.06.1967	21.10.1993	21.10.1993		
11.	Bakhtar Khan	Bara Khan	M.A	JDPE	GMS Wanda Zalo	15	1.11.1970	15.11.1994	15.11.1994		
12.	Anwar Khan	Dilawar Khan	B.A	JDPE	GMS Chadrar	15	17.2.21973	5.11.1996	5.11.1996		
13.	Saif Ur Rehman	Hatta-ur Rehman	BA	JDPE	GHSS Gul Imam	15	01.11.1970	16/11/1996	16.11.1996		
14.	Naseer Haider	Haider Khan	BA	JDPE	GMS Mumrez Patan	14	23.8.1972	17.1.1998	17.01.1998		
15.	Aftab Ahmad	Abdul Aziz	MSC	BE JDPE	GMS Kot Murtaza	15	15.6.1976	06/04/1999	06.04.1999		
16.	Imran Khan	Aziz Khan	BA	JDPE	GMS Shaikh Sultan	15	03.20.1977	06.04.1999	06.04.1999		
17.	Ishfaq Ahmed	Abdur Raza	SEPE	SDPE	GMS Tank Cantt	15	01.04.1977	06.04.1999	06.04.1999		
18.	Jaseem Haider	Haider Khan	BA	JDPE	GHS Kot Hakeem	15	05.06.1977	06.04.1999	06.4.1999		
19.	Said Khan	Mamraiz Khan	FA	JDPE	GHS Tajori	9	19.9.1977	09.04.1999	09.04.1999		
20.	Niaz Muhammad	Jan Muhammad	BA	JDPE	GHS Bazai	15	08.01.1975	23.12.1999	23.12.1999		
21.	Muhammad Jamil	Ghulam Boota	BA	SDPE	GMS Kot Nawaz	15	01.03.1975	23.12.1999	23.12.1999		
22.	Najeeb Nouman	Umar Daraz	BA	JDPE	GMS Naghzai	15	1.07.1977	23.12.1999	23.12.1999		
23.	Saeed Anwar	Gul Muhammad	MA	SDPE BA	GMS Tator	15	04.06.1975	24.12.1999	24.12.1999		
24.	Ikramullah	Rehmatullah	BA	JDPE	GHS M. Akbar	15	12.04.1976	24.12.1999	24.12.1999		

*Attended to be true copy*  
*M. A. Khan*  
*SA. J. B. Khan*

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26	Zain ul abidin	Minhaj Ud Din	BA	JDPE	GMS Toran	15	26.10.1975	27.09.2000	27.09.2000	
27.	Muhammad Ilyas	Azam Khan	BA	SDPE	GHS Garra Shahbaz	15	18.09.1981	20.9.2002	20.09.2002	
28	Seifur Rehman	Momin Khan	MSC	JDPE	GHS Gara Baloch	15	20.08.1974	27.09.2002	27.09.2002	
29	Muhammad Munir	Ghazi Marjan	MA	B, Ed:	GHS Mulazai	15	03.04.1976	27.09.2002	27.09.2002	
30.	Ahmad Sohail	Ahmad Saeed	M. SC	JDPE	GMS Cheena	15	09.04.1976	27.09.2002	27.9.2002	
31	Samar Gul	Abdullah Khan	MA	SDPE	GHS Amakhel	15	10.04.1979	27.9.2002	27.9.2002	
32	Muhammad Mushtaq	Amir Jafar	MA	JDPE	GMS Nandoor	15	19.04.1979	27.9.2002	27.9.2002	
33	Muhammad Arsalan	Muhammad Akram	BA	JDPE	GHS Maghazai	15	05.12.1979	27.9.2002	27.9.2002	
25	Muhammad Rahman	Abdul Jabbar.	BA	JDPE	GMS Andari	15	05.12.79	27.9.2002	27.9.2002	
34	Ahmad Saeed	Rab Nawaz	M.A	JDPE	GMS Kot Allah dad	15	03.02.1981	27.6.2002	27.6.2002	
35	Muhammad Arif	Zafar Khan	B.A	JDPE	GMS Sher Ali	15	07.05.1981	26.9.2002	26.9.2002	
36.	Muhammad Akram	Abdur Razzak	M.A	JDPE	GMS No.1 Tank	15	01.11.1973	18.10.2006	18.10.2006	
37.	Waris Khan	Qados Khan	FA	JDPE	GHS K Marwati	14	01.04.1976	01.03.2008	1.3.2008	
38	Shahid Nawaz	Muhammad Nawaz	BA	JDPE	GMS Dabara	15	10.6.1978	1.12.2006	24.10.2012	
39.	Muhammad Azem	Musa Khan	MA	JDPE	GMS Karimaidar	9	23.2.1971	24.10.2012	24.12.2012	
40	Rasool Khan	Fir Khan	MA	JDPE	GMS Kot Nawaz	14	24.4.1978	01.3.2008	01.03.2008	
41	Nasrullah Khan	Ziauddin Khan	MA	JDPE	GMS Kot Khadak	15	05.05.1978	01.12.2006	24.10.2012	
42	Nisarat Ullah	Musa Khan	MA	JDPE	GMS Raghza	15	01.07.1978	24.10.2012	24.10.2012	
43	Abdul Wahheed	Ghulam Sadiq	MA	JDPE	GMS Sabir Abad	15	15.03.1979	24.10.2012	24.10.2012	
44	Shafiq Alam	Rafiq Alam	MA	JDPE	GMS No.1 Tank	15	14.03.1981	24.10.2012	24.10.2012	

Attended  
Shahid Nawaz  
24.10.2012

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) TANK

General Seniority List of PET Teachers: (Males)

S.No	Name of Teacher	Father's Name	Acads.	Prof.	Place of Posting	BPS	Date of Birth	Date of 1st entry in Govt. Service	Date of Appnt. in the present post	Whether Eligible for Upgradation	Remarks
1	Naseeb Khan	Wazir Khan	SSC	JDPE	GHS Gomal Bazar	12	15/06/1958	16/06/1976	16/06/1976		
2	Abdul Majeed	Gul Muhammad	FA	JDPE	GHS No 2 Tank	12	15/03/1956	25/04/1976	11/12/1978		
3	Alla Ullah Jan	Noor Ul Islam	SSC	JDPE	GHS Daraki	12	10/01/1958	11/09/1981	11/09/1981		
4	Muhammad Ghulam	Umar Khan	SSC	JDPE	GHS Kaka Khel	12	07/04/1953	22/10/1982	22/10/1982		
5	Muhammad Ayub	Umar Khan	SSC	JDPE	GHS Umar Khel	12	30/01/1959	25/10/1982	25/10/1982		
6	Sakoor Khan	Akmal Ullah	BA	SDPE	GHS Poi	15	25/12/1964	07/10/1995	07/10/1995		
7	Akhtar Khan	Farooq Muhammad	BA	JDPE	GMS Naurang	15	10/02/1964	20/10/1986	20/10/1986	OK	
8	Ghulam Jan	Sahib Jan	MA	JDPE	GMS Adda Umar	15	24/05/1958	01/12/1988	01/12/1988	OK	
9	Muhammad Nazam	Muhammad Ayaz	M.Sc	U ED	GHS Ranwal	15	05/05/1962	01/02/1979	06/12/1988		
10	Jalinger Khan	Said Hussain	M.Sc	JDPE	GHS Sheekh Ullah	15	15/08/1967	21/10/1993	21/10/1993	OK	
11	Bakhtyar Khan	Gary Khan	MA	SDPE	GMS Wanda Kote	15	01/11/1970	15/11/1994	15/11/1994	OK	
12	Anwar Khan	Dilawar Khan	BA	JDPE	GMS Chadrar	15	17/02/1973	05/11/1996	05/11/1996	OK	
13	Said Ur Rehman	Hatib Ur Rehman	BA	SDPE	GHSS Gul Imam	15	01/11/1970	15/11/1996	16/11/1996	OK	
14	Naseem Haider	Haider Khan	BA	JDPE	GMS Mamraiz Patnan	14	23/08/1972	17/01/1998	17/01/1998	OK	
15	Atab Ahmad	Abdul Aziz	M.Sc	B Ed SDPE	GMS Kot Murtaza	15	15/06/1976	06/04/1999	06/04/1999	OK	
16	Muzam Khan	Aziz Khan	BA	JDPE	GMS Sheekh Sultan	15	03/02/1977	06/04/1999	06/04/1999	OK	
17	Ishfaq Ahmad	Abdul Razaq	MA	SDPE	GMS Tank Cantt	15	01/04/1977	06/04/1999	06/04/1999	OK	
18	Joseem Haider	Haider Khan	BA	JDPE	GHS Kot Hafeem	15	05/05/1977	06/04/1999	06/04/1999	OK	
19	Sayed Ahmad	Muhammad Waqar	FA	JDPE	GHS Tabor	15	19/07/1977	09/04/1999	09/04/1999	OK	
20	Muhammad Ahmad	Jan Muhammad	BA	JDPE	GHS Baran	15	02/01/1975	23/12/1999	23/12/1999	OK	
21	Muhammad Jamil	Ghulam Qasim	BA	SDPE	GMS Kot Murtaza	15	01/05/1975	23/12/1999	23/12/1999	OK	
22	Majid Rahman	Umar Doraz	BA	JDPE	GHS Maghza	15	01/07/1977	23/12/1999	23/12/1999	OK	
23	Sayed Ahmad	Gul Muhammad	MA	SDPE	GMS Tabor	15	04/05/1975	24/12/1999	24/12/1999		
24	Bram Ullah	Rahmatullah	BA	JDPE	GHS M Akbar	15	12/04/1976	24/12/1999	24/12/1999		

Annex B

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S.No	Name of Teacher	Father's Name	Acad.	Prof.	Place of Posting	BPS	Date of Birth	Date of 1st entry in Govt. Service	Date of Appt. in the present post	Whether Eligible for Upgradation	Remarks
25	Zain Ullah	Munhaj Ullah	BA	JDPE	GHS Toran Nahr	15	25/11/1975	27/09/2000	27/09/2002		
26	Muhammad Ilyas	Aziz Khan	BA	JDPE	GHS Gara Shambhaz	15	18/03/1981	26/09/2002	27/09/2002		
28	Sulair Rehman	Mosam Khan	M.Sc	JDPE	GHS Gara Batoch	15	20/03/1974	27/09/2002	27/09/2002		
29	Muhammad Munir	Ghazi Mangan	MA	B.E.D	GHS Mullazar	15	03/04/1976	27/09/2002	27/09/2002		
30	Ahmad Sohail	Ahmad Saeed	M.Sc	JDPE	GMS Cheena	15	03/03/1978	27/09/2002	27/09/2002		
31	Samar Gul	Abdullah Jan	MA	SDPE	GHS Amakhel	15	09/04/1978	27/09/2002	27/09/2002		
32	Muhammad Mushlaq	Amir Jafar	MA	JDPE	GMS Nandoor	15	10/04/1979	27/09/2002	27/09/2002		
33	Muhammad Arsalan	Muhammad Akram	BA	JDPE	GHS Maghzai	15	19/04/1979	27/09/2002	27/09/2002		
35	Muhammad Rahim	Abdul Jabbar	BA	JDPE	GMS Andari	15	05/12/1979	27/09/2002	27/09/2002		
34	Ahmad Saeed	Rab Nawaz	M.Sc	JDPE	GMS Kol Allah Dad	15	03/03/1981	27/09/2002	27/09/2002		
35	Muhammad Aul	Zafar Khan	M.Sc	SDPE	GMS Sher Ali	15	07/03/1981	27/09/2002	27/09/2002		
36	Muhammad Akram	Abdul Razaq	MA	JDPE	GCMHS No 1 Tank	15	01/11/1973	28/09/2002	28/09/2002		
37	Waqar Khan	Races Khan	BA	JDPE	GHS K Marwali	14	01/04/1976	18/10/2002	18/10/2002		
38	Ghulam Nawaz	Muhammad Nawaz	MA	B.E.D	GMS Dabara	15	16/05/1978	18/10/2005	18/10/2005		
39	Muhammad Azam	Musa Khan	FA	JDPE	GHS Kirri Haider	9	23/02/1971	01/03/2008	01/03/2008		
40	Rasool Khan	Riz Khan	BA	JDPE	GMS Kol Nawaz	14	24/04/1978	01/03/2008	01/03/2008		
41	Masood Khan	Zaid Ullah Khan	MA	JDPE	GHS Kol Khadak	15	05/03/1978	01/10/2005	24/10/2012		
42	Mansoor Ullah Khan	Mash Khan	MA	JDPE	GMS Raghza	15	01/07/1978	24/10/2012	24/10/2012		
43	Abdul Waheed	Ghulam Saadq	MA	JDPE	GMS Sabir Abad	15	15/03/1979	24/10/2012	24/10/2012		
44	Shahq Alam	Rafiq Alam	MA	JDPE	GCMHS No 1 Tank	15	24/03/1981	24/10/2012	24/10/2012		
45											

Zain Ullah (Sign)  
18/05/2008

Zain Ullah Khan  
Dy. District Education Officer (M) Tank

Ghulam Qasim Khan  
District Education Officer (M) Tank

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Amman - C

**OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) TANK**

**OFFICE ORDER:**

Consequent upon the recommendations of Departmental Selection Committee and appointment orders issued by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide his Endst. No. 5652-58/File No. 2/Promotion SPET B-16 Dated: 10-08-2016, are hereby further adjusted against the vacant posts of Sr. PET as noted against their names, as the services of the said teachers are placed on the disposal of District Education Officer (Male) Tank, in the best interest of public service with immediate effect.

S.No	S.L.No	Name of Official	Previous Place of Posting	Present Place of Posting	Remarks
1.	20	Mujeeb ur Rehman	GHS Maghzai	GHS Kiri Marwati	A.V.Post

**Note:**

- Terms & Conditions will be considered same as mentioned in the above reference orders.

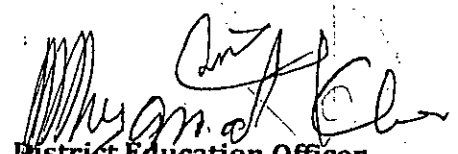
\*\*\*SD\*\*\*

**District Education Officer  
(Male) Tank**

Endst. No. 2850-56 /Promotion SCT-2016 Dated Tank the 11 /08/2016

**Copy of above is forwarded for information & necessary action to the:**

- 1) Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar w/r to his No. 5652-58/File No. 2/Promotion SPET B-16 Dated: 10-08-2016.
- 2) District Accounts Officer, Tank
- 3) Dy. District Education Officer (Male) Tank
- 4) Principal / Headmaster Schools Concerned.
- 5) Officer Concerned.
- 6) PA File.

  
**District Education Officer  
(Male) Tank**

11/8/16

Mujeeb ur Rehman

خدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحب (امروان) حکم ایجنسی اینڈ سٹڈیز ایجوکیشن ضلع مانگ  
(11) عنوان: بابت دستگی سناری لیٹ (بی ای ای ٹی) گیدر

Annexure D  
جناب عالی! خودبانہ گزارش بحضور اوریجے کہ سائل بھت بی ای ای ٹی پچر بموجب حکم نمبر 1605-97-3060

تاریخ: 23/12/1999 آمدہ از دفتر DEO(M) گورنمنٹ ٹیچر سکول ٹیچر کونسل اللہ داد میں تعینات ہوا۔  
ادرا ب سائل مرض: 10/08/2016 سے بھت سٹڈیز بی ای ای ٹی (SPET) گورنمنٹ ہائی سکول کڑی مردی  
میں اپنے فرائض منصبی بخوبی احسن سر انجام دے رہا ہے

جناب عالی! حکم ایجوکیشن مانگ میں مرض 23/12/1999 کو سونے والے (بی ای ای ٹی) کے آڈرز میں  
سائل کے ساتھ دو اور پچرز مسی نیاز ہوا وہ مسی قہر جس میں SPET کے کیپٹن آڈرز میں ہے

جو کہ میرٹ پرزیشن میں سائل کے بعد ہے  
اس ضمن میں حکم لگانے جب سال 2013 میں SPET کے لئے ممکنہ سناری لیٹ مرتب کی  
تو مذکورہ سناری لیٹ میں سائل کی میرٹ پرزیشن کو نظر انداز کر کے نیاز ہوا اور قہر جس میں SPET  
کو پہلے لیا گیا۔ حالانکہ آڈرز کے (Terms & Conditions) کے پیرا نمبر 04 میں واضح

لکھا گیا ہے کہ پہلے سناری لیٹ میں میرٹ فارم کو دیکھا جائے گا  
جناب عالی! میرٹ میں پہلے سونے کے باوجود بھی سائل کی سناری لیٹ کو کبھی نظر انداز کیا گیا ہے۔  
اور سائل کو سنہ 2013 سے ترقی سے محروم رکھا گیا ہے جو کہ سائل کے ساتھ ہی تعین کا منہ پرانا ثبوت ہے۔  
جناب عالی! درخواست گزار قبل ازہی مرض 03/06/07 کو ایک درخواست در خواست SPET میں سناری لیٹ

اور مقدمہ نکل سٹڈیا آڈرز کا ہے۔ سابقہ (Wrong S/last) درخواست در خواست سناری لیٹ SPET  
درخواست میں جمع کرائے گئے۔ جس میں سائل کوئی بھت پیشینہ نہیں کیا گیا۔  
لہذا آج جناب عالی سے ہم در داخ انہاس ہے کہ میرٹ کی بالدرستی قائم رکھے جسے اور سائل کو اپنا حق دلوت کرے  
رہی ای ای ٹی کی سناری لیٹ میں دستگی زماں مرض 21/02/2013 سے تمام مراعات کے ساتھ  
سائل کو برپوشی کا حق دیا جائے۔ نوٹ: ہمارے دفتر میں سناری لیٹ بورڈ پیر اوپیرا نہیں کی جاتی  
اس ضمن میں اگر سائل کی درخواست پر شنوائی کی گئی تو سائل سروس ٹریبونل سے رجوع کرنے کا قانونی حق رکھتا ہے۔  
عین نواز سائل ہوگی

مرض: 16/06/17  
سائل مجیب الرحمان SPET، GHS کڑی مردی تحصیل مانگ  
16/06/17

خدمت جناب ڈائریکٹر آف ایجوکیشن، محکمہ ایلمینٹری اینڈ سیکنڈری ایجوکیشن، ایسٹوار صوبہ خیبر پختونخواہ  
عنوان :- بابت درستگی سپارٹس لیٹ (بی۔ای۔ٹی) کیڈر

جناب عالی!

نوڈمان گزارش ہے کہ سائل محبت بی ای ای ٹی پتھر، موجب حکم نمبر 3060-97-1605

موضوع: 23/12/1999، آمدہ از دفتر ڈسٹرکٹ ایجوکیشن آفیسر صاحب (مردانہ) ٹانک، بیام گورنمنٹ سیکولر

کوٹ اللہ داد ٹانک میں تعینات ہوا اور اب سائل مورخہ 10/08/2016 سے محبت پتھر بی ای ای ٹی

گورنمنٹ ہائی سکول کروی مروتی میں ایسے فرائض نبوی الرحمن فراہم وے رہا ہے۔

جناب عالی، محکمہ ایجوکیشن ٹانک میں مورخہ: 23/12/1999 کو سونے والے (بی ای ای پتھر) اساتذہ

کے آڈرز میں سائل کے ساتھ دو اور پتھرز مستی نیاز محمد PET، مستی محمد جمیل PET کے کیمائینڈ

آڈرز مرنے تھے جو کہ مہرٹ پوزیشن میں سائل کے بعد تھے۔

اسی ضمن میں محکمہ ایجوکیشن ٹانک نے سال 2013 میں (بی ای ای پتھر) اساتذہ کے لئے

محکمہ سپارٹس لیٹ مرتب کی۔ تو مذکورہ سپارٹس لیٹ میں سائل کی مہرٹ پوزیشن کو نظر انداز

کر کے نیاز محمد PET، محمد جمیل PET کو پلے لیا گیا۔ حالانکہ تعیناتی آڈرز کے

(Terms & Conditions) کے پیرا نمبر 04 میں واضح لکھا گیا ہے کہ سپارٹس لیٹ میں

مہرٹ فارمولے کو دیکھا جائے گا۔

جناب عالی، مہرٹ میں اولین ہونے کے باوجود سائل کی سپارٹس لیٹ کو بکسر نظر انداز کیا گیا ہے۔

اور سائل کو 2013 سے ترقی / Promotion سے محروم رکھا گیا ہے جو کہ سائل کی حق تلفی کا نتیجہ ہوتا ہے۔

جناب عالی، سائل قبل ازیں مورخہ 03/06/07 کو اپنی درخواست دفتر میں گزرا کر دیا گیا ہے

کہ (بی ای ای پتھر) اساتذہ کی غلط مرتب کردہ سپارٹس لیٹ میں درستگی / Correction کی جائے

جسے بحال کوئی مثبت پیش رفت نہ ہو سکی۔

لہذا آج جناب عالی سے اپنا سہ ہے کہ مہرٹ پالیسی کی بالادستی قائم رکھے جائے، سائل کو اپنا حق دلدار ہے

(بی ای ای پتھر) کی سپارٹس لیٹ میں درستگی فرما کر سائل کو مورخہ: 21/02/013 سے تمام مراعات کے ساتھ

بروز خوشی کا حق دیا جائے۔ اور مقدمہ طور پر (PETs) کی سپارٹس لیٹ دفتر میں اس لئے برقرار آڈر کی جائے

اس ضمن میں سائل کی درخواست پر استوائی نہ کی گئی تو سائل سرورس ٹریبونل سے رجوع کرنے کا

قانونی حق رکھتا ہے۔

محمد

سائل مجیب الرحمان پتھر بی ای ای ٹی، H.S کروی مروتی ٹانک


16/06/17

Handwritten signature and notes at the bottom of the page.

(13)

# وکالت نامہ

SH. IFTIKHAR UL HAQ  
Advocate High Court  
N.I.C. 12201-0316740-9  
S.No 1365



Issuing Authority

ایب روپیہ

کورٹ  
فیس

Refer the <sup>service</sup> ~~pastor~~ <sup>of</sup> ~~High~~ Tribunal of <sup>کراچی</sup> ~~High~~ Court  
Appellant <sup>منجانب</sup>  
Mr. Job-ul-Hameed <sup>انتہاء</sup> ~~of~~ <sup>جو</sup> ~~for~~ <sup>میں</sup> ~~the~~ <sup>جو</sup> ~~service~~ <sup>میں</sup> ~~appeal~~ <sup>دعویٰ یا جرم</sup>

تفصیل دعویٰ یا جرم

## باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بیرونی وجوہات کے پیش یا تصدیق مقدمہ منہاج D. I. Khan کے لیے

Sheikha Anwar ul-Huda Anwar ul-Huda Anwar ul-Huda

گزارش ذیل شرائط پر ایک مقرر کیا ہے کہ میں پیشی پر خود یا ذرا بذریعہ دو برو عدالت حاضر ہوں گا اور ہر وقت پکھتے جانے مقدمہ دیکل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر منظر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور حرجے ظالم ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز دیکل صاحب موصوف صدر مقام کچھری کے علاوہ یا کچھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر کچھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا کچھری کے اوقات کے آگے یا پیچھے پیش ہونے پر منظر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا سخت نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے مجھ کو مکمل ساختہ پر داخستہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ یا درخواست اجراء اسمائے ذگری نظر ثانی اپیل عمرانی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر ثالثی یا ماضی نامہ و فیصلہ برحلاف کرنے اقبال دعویٰ کا بھی اختیار ہو گا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مقرر بیرونی از کچھری صدر بیرونی مقدمہ مقرر نظر ثانی اپیل و عمرانی و برآمدگی مقدمہ یا منسوخی ذگری یک طرفہ یا درخواست حکم امتناعی یا قرتی یا گرفتاری قبل از فیصلہ اجراءے ذگری بھی صاحب موصوف کو بشرط ادا ہوگی طبعہ مقررہ دعا مقررہ کی کا اختیار ہو گا اور تمام ساختہ پر داخستہ صاحب موصوف مثل کردہ از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو کہ مقدمہ مقررہ یا اس کے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی اپیل عمرانی یا دیگر معاملہ و قدم مذکورہ کسی دوسرے دیکل یا ہیر سڑک اسپے بجائے یا اپنے ہر ملہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا وہ صاحب موصوف کا حق ہو گا مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا وکالت نامہ لکھ دیا ہے تاکہ سند ہے 2017

موجود 10  
مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

Attested  
& Accepted  
Sh. Iftikhar ul Haq

21/06/17  
NIC # 12201-1879408-7

**"B"**

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

TB

No.

Appeal No. 1221 of 2017

Mujeeb ur Rehman Appellant/Petitioner

Versus

Through Secy. Edu. K.P.K. Pesh. Respondent

Respondent No. 3

Notice to: Distt. Education Officer (Male)  
Tank.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 12/11/17 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No.....dated.....

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

Day of Decr .....2017

(at Camp Court D-1 Khan)

[Signature]  
Registrar  
Khyber Pakhtunkhwa  
Pesh

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

**"B"**

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

TB

No.

Appeal No..... 1221 ..... of 20 17

..... M. J. B. in Re ..... Appellant/Petitioner  
Versus

..... Through J. J. B. in Re ..... Respondent  
Respondent No..... 1 .....

Notice to: - Distt Account Officers, Tank

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 12/12/17 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this..... 11/12 .....

Day of..... Dec ..... 20 17

(at Camp Court D. I. Khan)

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

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

**"B"**

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

No.

*TB*

Appeal No..... of 20

*1221*

*17*

Appellant/Petitioner

*Mujeeb-u-Rahman*  
Versus

Respondent

Through *Sgt. Edm. 15, P/O*  
Respondent No.....

*5*

Notice to: —

*Niaz Muhammad S/O Jan Muhammad*  
*R/O Razaq, Colony Tank, P/O DCO (male)*

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

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

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

*17/11*

Day of.....20

*Decr*

*17*

*(at Camp Court D.I. (old))*

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

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



**"B"**

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

No.

1221

17

Appeal No. 1221 of 20 17  
Mr. Jeeb - ur-Rahman

Appellant/Petitioner

Mrs. Sajida *Versus* Education

Respondent

Respondent No.

Muhammad Jamal, 80 Ghulam Daud  
R/O Kat Mastana Dist. Tank.

Notice to:

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

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Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated..... 11/12

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

Dec 17

Day of.....20

(at Camp Court D. 1 Khan)

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

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

**"B"**

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

T.B.

No.

Appeal No. 1221 of 20 17

Mujeeb ur Rahman Appellant/Petitioner

Versus

Through Secy. Education Respondent

Respondent No. 5

Notice to: —

Niaz Mohammad & Jo Jan Mohammad  
R/o Razaq Colony Tank. C/o DEO @ Tank

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 15/3/2018 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this 5/3/18 .....

Day of Feb. 20 18

(at camp court D.I. Khan)

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

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

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR CAMP COURT ,D.I.KHAN**

Service Appeal No.1221/2017

Mujeeb Ur Rehman

----- (Appellant)

VS

Govt: of Khyber Pakhtunkhwa etc

Respondent

**PARAWISEREPLY ON BEHALF**  
**OF RESPONDENTS NO. 1,2&3**

**RESPECTFULLY SHEWETH**

Respondents humbly submit as under:-

**PRELIMINARY OBJECTIONS**

1. That the appeal is badly time barred.
2. That the appellant has got no cause of action and locus standi.
3. That the appellant has not come to this Honourable Tribunal with clean hands.
4. That the appellant deliberately concealed the real facts from this Honourable Tribunal.
5. That the appeal is bad for misjoinder and non-joinder of necessary parties.
6. That the appeal is not maintainable in its present form.
7. That the Honourable Tribunal has no jurisdiction to adjudicate the matter.

**FACTS**

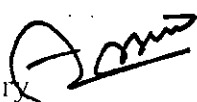
1. Para No.1 is Correct.
2. Para No.2 is correct to the extent of Seniority List. However date of entry into service of the appellant as well as respondent No. 5 & 6 are the same i.e. dated 23-12-1999. However both respondent No. 5 & 6 were placed senior due to their age as per rules.
3. Para No.3 is Correct to the extent that private respondents were promoted as Senior PET on 21/2/2013 according to the seniority list of all PET's of District Tank, but rest of the para is incorrect as duly replied in Para No. 2.
4. Para No.4 is also correct. The appellant has been promoted to senior PET on 11/8/2016 according to the seniority list on his own turn.
5. Para No. 5 is incorrect and not admitted. The appellant departmental appeal was badly time barred, as the appeal has not been submitted within specified time under Section-4 of KPK Service Tribunal Act 1974.

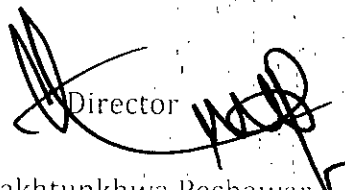
6. Para No. 6 is incorrect, hence no comments.

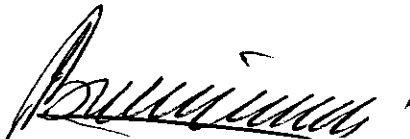
**GROUNDS**

- A. Para No (a) is incorrect & not admitted. Detail reply has been given in Para No. 2.
- B. Para No.(b) is incorrect & not admitted. The appointment order of appellant and private respondents were issued on the same dated. So according to rules, the civil servant older in age will be considered as Senior, submission of arrival report don't entitle appellant for seniority.
- C. Para No.(c) is incorrect & not admitted. Hence no comments.
- D. Para No.(d) is incorrect.
- E. Para No.(e) is incorrect and not admitted. The appellant is junior from private respondents because their appointment order will be issued on the same date and the private respondents were older in age from the appellant.
- F. No comments.

In view of the above, the service appeal of the appellant may kindly be dismissed with cost.

  
Secretary  
E&SE Deptt: E&SE Deptt:  
Khyber Pakhtunkhwa Peshawar  
Respondent No. 1

  
Director  
Khyber Pakhtunkhwa Peshawar  
Respondent No. 2

  
District Education Office  
(Male) Tank  
Respondent No. 3

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR CAMP COURT D. I. KHAN**

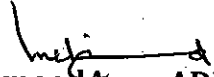
Service Appeal No. 1221 /2017

Mujeebur Rahman VS

Government of Khyber Pakhtunkhwa etc

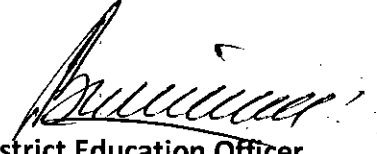
**AFFIDAVIT**

I Mr. Mehmood Azam A.D.E.O(Litigation) o/o the District Education Officer  
(Male) Tank do hereby solemnly affirm and declared on the oath that the Para wise  
comments are true and correct to the best of my knowledge and belief that nothing has  
been concealed from this Honourable Tribunal.

  
**Mehmood Azam ADEO**  
Litigation  
O/O DEO(M) Office, Tank  
CNIC No.12201-0313189-7

## Authority Letter

Mr. Mahmood Azam Assistant District Education Officer (Litigation) o/o District Education Officer (Male) is hereby authorized to attend the honouralbe Khyber Pakhtunkhwa Sevice Tribunal Camp Court D. I. Khan in connection with S. A No. 1221/2017 titled as Mujeebur Rahman VS KPK on behalf of the undersigned.



District Education Officer

Male Tank

**"B"**

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

No.

7B

Appeal No.....1224..... of 20 17

.....Mujeeb-ur-Rehman.....Appellant/Petitioner  
Versus

.....Through Secy. Edn. U.K. Pesh. Respondent  
Respondent No.....5.....

Notice to: — Niaz Muhamamad S/O Jan Muhamamad  
R/O Razaq Colony Tank C/O DEO (M) Tank

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

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

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

Given under my hand and the seal of this Court, at Peshawar this.....30/01.....

Day of.....August.....20 14

at Camp Court D.I. Khan.

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

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

**"B"**

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

TB

No.

Appeal No. 1221 of 2017

Mujeeb ur Rehman Appellant/Petitioner

Through Saeed <sup>Versus</sup> Edna K.Pk Pesh. Respondent

Respondent No. Muhammad Jamil So Ghulam Dawood  
R/o Kot Murtaga Distt. Tank Govt. High  
School Kot Khadik Teh. 9 Distt. Tank.

Notice to: —

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

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

Given under my hand and the seal of this Court, at Peshawar this.....  
Day of August 19 2017

at Camp Court D.I. Khan

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

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