

25.07.2022

Due to summer vacation, the case is adjourned for the same on 26.09.2022.


Reader

26th Sept 2022

Counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for respondents present.

Written reply/comments on behalf of respondents No. 7 and 13 not submitted despite last chance, therefore, their right for submission of written reply/comments is struck off. To come up for arguments on 25.10.2022 before D.B at Camp Court, D.I. Khan.




(Kalim Arshad Khan)
Chairman

25.10.2022

Appellant present through counsel Camp Court D.I.Khan


Kabir Ullah Khattak, learned Additional Advocate General 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 25.05.2022 for the same as before.


Reader.

25.05.2022

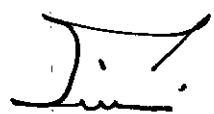
Clerk of learned counsel for the appellant present. Mr. Mahmood Azam, ADEO (Litigation) as representative of official respondents No. 1 to 3 alongwith Mr. Farhaj Sikandar, District Attorney present. None present on behalf of private respondents No. 4 to 16.

Representative of official respondents No. 1 to 3 submitted reply, which is placed on file and copy of the same is handed over to clerk of learned counsel for the appellant.

Comments on behalf of private respondents except private respondents No. 7 & 13 have already been submitted, while reply/comments on behalf of private respondents No. 7 & 13 are still awaited.

Previous date was changed on Reader Note, therefore, notice be issued to private respondents No. 7 & 13 through registered post and last chance given for submission of reply/comments. In case the last chance as given is not availed, the next adjournment shall be subject to prior payment of cost of Rs. 5000/- to the appellant, failing which the case shall be fixed before D.B for arguments without reply/comments deeming the same as waived off by the respondents. Adjourned. To come up for submission of written reply/comments on behalf of private respondents No. 7 & 13 on 25.07.2022 before the S.B at Camp Court D.I.Khan.

Notice also be issued to private respondents No. 4 to 6, 8 to 12 & 14 to 16 as well as their respective counsel through registered post for the date fixed.

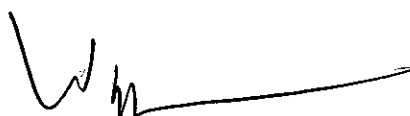

(Salah-Ud-Din)
Member (J)
Camp Court D.I.Khan

26.10.2021

Appellant present through counsel.

Asif Masood Ali Shah learned Deputy District Attorney for official respondents present. Nemo for private respondents.

Reply on behalf of respondents was not submitted. Request for adjournment was made on behalf of learned D.D.A in order to contact the respondents for submission of reply/comments; opportunity is granted with direction to furnish the same within 10 days positively. Private respondents be put on notice for submission of reply/comments in office within the stipulated period of 10 days. To come up for arguments on 25.11.2021 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

25.11.2021

Counsel for the appellant and Mr. Noor Zaman Khattak, District Attorney alongwith Mehmood Azam, ADEO for the official respondents present and seeks time to furnish reply/comments. Counsel for private respondents No. 4, 5, 6, 8, 9, 10, 11, 12, 14, 14 and 16 present and submitted reply/comments. Fresh notices be issued to respondents No. 7 and 13 for next date. Last opportunity is granted to official respondents as well as private respondents No. 7 and 13 for submission of written reply/comments on next date. Case to come up on 24.01.2022 before S.B at camp court, D.I.Khan.

In case the last chance as given above is not availed, the next adjournment shall be subject to prior payment of cost of Rs. 5000/- to the appellant failing which the case shall be fixed before D.B for arguments without reply/comments deeming the same as waived off by the said respondents.



Chairman
Camp Court, D.I.Khan

29.07.2021

Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant states that the seniority list as disputed in the present appeal is already in dispute in case of Tariq Kundi Vs. Government which according to learned counsel has already been admitted for regular hearing. Subject to all just and legal objections, the appeal is admitted for full hearing. The appellant is directed to deposit 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 receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 26.10.2021 before the D.B at camp court, D.I.Khan.

Appellant Deposited
Security & Process Fee

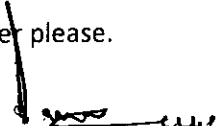
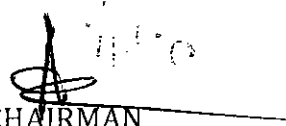

Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 4841/2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/04/2021	<p>The appeal of Mr. Inamullah resubmitted today by post through Sheikh Iftikharul Haq Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	04/06/2021	<p>This case is entrusted to S. Bench Peshawar. Notices be issued to appellant/counsel for preliminary hearing on 29 /07/2021.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Inamullah son of Attaullah STT GHS Tarano District Tank received today i.e. on 22/03/2021 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 respondents No. 4 to 16 are incomplete which may be completed according to Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Page no. 17 and 18 of the appeal are illegible which may be replaced by legible/better one.
- 3- Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal in file covers.

No. 588 /S.T,

Dt. 25/03 /2021

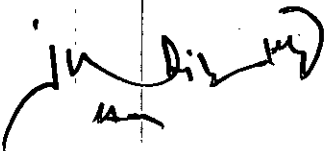

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Sheikh Iftikhar ul Haq Adv.
District Bar D.I.Khan

Respected Sir,

The objections has been removed.
Hence resubmitted please. Sir.

15.4.2021



BEFORE THE KPK SERVICES TRIBUNAL, PESHAWAR

In Service Appeal No. 484 /2021

Inamullah
(**Appellant**)

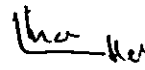
Versus

Govt Of KPK, etc
(**Respondents**)

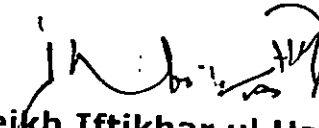
INDEX

S.No.	Description of document	Annexure	Pages
1.	Service Appeal with affidavit	--	1-8
2.	Copy of the impugned order of appointment of appellant with affidavit	--	1
3.	Copy appointment order	A	-9-
3.	Copy of the impugned seniority list	B	10-11
4.	Copy of application	B/1	-12-
5.	Copy of the seniority list dated 01/01/2020	C	13-14
6.	Copy of the department appeal with postal receipt & others order	D	15-18
7.	Wakalatnama	--	-19-

Your humble appellant,


Inamullah

Through counsel:-


Sheikh Iftikhar ul Haq
Advocate High Court
District Bar Dera Ismail Khan

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. _____/2020

Diary No. 3966

Dated 22/3/2021

Inamullah son of Attaullah r/o village Torano, Tehsil & District Tank. Presently serving as STT at Govt. High School Torano, District Tank. Cell#0344-7600145

.....(**APPELLANT**)

VERSUS

1. Government of KPK, Through Secretary Elementary & Secondary Education Peshawar
2. The Director (E&S) Education Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Male) Tank.
4. Misbah ud Din Senior Theology Teacher c/o District Education Officer (Male) Tank. R/o village Ammakhel Tehsil & District Tank s/o wali Muhammad
5. Momin Khan Senior Theology Teacher c/o District Education Officer (Male) Tank. R/o village Ammakhel Tehsil & District Tank s/o Malay Khan
6. Fitratullah Senior Theology Teacher c/o District Education Officer (Male) Tank } s/o Abdul Haq posted G.H.S.S Mulazai Tank village & Post office Mulazai Tehsil & Dist Tank
7. Khan Badshah Senior Theology Teacher c/o District Education Officer (Male) Tank } sp Muhammad Aslam posted at G.H.S.S Maghzaai Tank R/o village Ammakhel Tehsil District Tank
8. Muhammad Tahir Senior Theology Teacher c/o District Education Officer (Male) Tank s/o Haibat Khan G.H.S No3 Tank R/o Village Mandoor Post Office Pai Tehsil & Dist. Tank
9. Hameedullah Senior Theology Teacher c/o District Education Officer (Male) Tank } S/o Amman ullah S.T.T=16 Post G.H.S Akbari Tank R/o village Akbari Tank
10. Muhammad Tahir Shah Senior Theology Teacher c/o District Education Officer (Male) Tank } S/o Muhammad Khan S.S.T G.H.S Darraki Tank R/o Gharib Abad Post office pai Tehsil & Dist Tank
11. Muhammad Ismail Senior Theology Teacher c/o District Education Officer (Male) Tank } s/o Yar Muhammad G.H.S Karri Marwati Tank R/o Rahmat Abad Karri Marwati Tehsil & District Tank

- 12. Ubaid Anwar Senior Theology Teacher c/o District Education Officer (Male) Tank } S/o Muhammad Ibrahim G.H.S. Tajori Tank R/o Gharib Abad post office Pail Tehsil & Dist Tank
- 13. Inamullah Senior Theology Teacher c/o District Education Officer (Male) Tank } S/o Atta ullah post of G.H.S Toran Tank R/o village Toran Tehsil & Dist Tank
- 14. Shafiullah Senior Theology Teacher c/o District Education Officer (Male) Tank } S/o Abdul Aziz post of G.H.S Umar Khel Tank R/o village Umar Khel Tehsil & Dist Tank
- 15. Muhammad Gulzar Senior Theology Teacher c/o District Education Officer (Male) Tank } S/o Mohammad Khan Post G.H.S Ranwal R/o Mohallah Pannarian R/o Kayo Khan Tehsil & Dist Tank
- 16. Azmat Khan Senior Theology Teacher c/o District Education Officer (Male) Tank } S/o Hassan Khan Post of G.H.S Charsen Kach Tank R/o Shah Alam Tehsil & Dist Tank

..... (RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974.

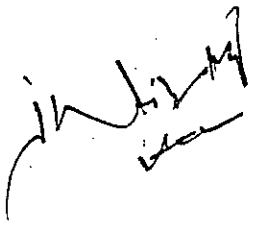
PRAYER

On acceptance of the instant appeal this honourable Tribunal be pleased by correcting the seniority list of Theology Teachers District Education Office Tank as well as list of Senior Theology Teachers and the appellant be placed Senior than the private respondents on the ground that the merit position of the appellant is high than the private respondents and on the basis of meritorious policy the appellant is rightful/entitled to be placed as Senior than private respondents by correcting the seniority list retrospectively as well as prospectively and this honourable Tribunal may further be pleased that appellant be adjusted as Senior Theology Teacher (BPS-16) with all back benefits from the year 2013 on notional bases and the instant appeal also against the qua the non-action/order of the appellate authority over the departmental appeal of the appellant.

Respected Sir,

Appellant humbly submits as under;

1. That the appellant is a noble citizen having qualification of B.A, B.Ed, M.A, M.Ed along with additional course of Shahadat ul Almia as per required for eligibility of theology Teacher and the appellant was initially appointed as Theology Teacher on 11/07/2007 and reported on duty on 01/09/2007 in the incumbency of District Education Officer (male) Tank. Copy of the appointment order is annexed as **Annexure-A**.
2. That the official respondents issued a seniority list in the year 2013, for Theology Teachers in District Education Office Tank, wherein the appellant had been shown junior than the private respondents. Although the official respondents were required to place the appellant as Senior than the private respondents because the merit position of the appellant was higher than the private respondents as per service policy & service rules those employees who were higher in merit are rightful/entitled to be placed as Senior than those who were older in age, which were appointed on the same date. It is also pertinent to mention that in the year 2013 the private respondents were promoted instead of the appellant as Senior Theology Teachers (BPS-16) on the basis of incorrect seniority list and against the service rules and service policy of the department as promulgated and privileged policy for seniority as the official respondents were required to promote the appellant as the appellant was entitled/rightful on the basis of prevailing policy. Copy of the impugned seniority list is annexed as **Annexure-B**.
3. That the appellant submitted an application to the District Education Officer (Male) Tank for provision of record of the private respondents and other record in respect of seniority under the Act of Right to Information KPK, 2013 but in vain. Hence, the appellant submits before this honourable Tribunal to requisite the who record in respect of seniority including



appointment orders of private respondents. Copy of application is annexed as **Annexure-B/1**.

- 4. That thereafter the official respondents issued the seniority list on 01/01/2020 on the basis of merit position and appellant was placed on the correct place/serial number. Copy of the seniority list dated 01/01/2020 is annexed as **Annexure-C**.
- 5. That thereafter when the appellant came into knowledge of the aforementioned incorrect seniority list because after the approval of correct seniority list, the appellant being aggrieved submitted a departmental appeal dated 01/12/2020. The official respondents not decided the departmental appeal of the appellant and similarly did not bother to reply the same. Copy of the department appeal with postal receipt is jointly annexed as **Annexure-D**.
- 6. That appellant feeling aggrieved by the impugned act and omissions as well as impugned seniority list, hence, the instant appeal on the following grounds.

GROUNDS

- a. Because as per policy, appellant is entitled for seniority because the appellant was appointed on open merit and his merit position is higher than the private respondents and the official respondents are duty bound to revisit/correct the seniority list.
- b. Because the valuable rights have been accrued to the appellant the same cannot be snatched because the right of appellant is fully accrued as evident from the fresh seniority list of 2020.
- c. Because neither the competent authority nor the departmental promotion committee can cross the parameters of service policy and service laws.
- d. Because the seniority is the right of appellant which has been withheld by the official respondents for no good reasons.

- e. That this honourable Tribunal has got vast and ample powers to entertain the instant appeal.
- f. That counsel for the appellant may graciously be allowed to raise additional grounds at the time of arguments.

It is therefore humbly prayed that On acceptance of the instant appeal this honourable Tribunal be pleased by correcting the seniority list of Theology Teachers District Education Office Tank as well as list of Senior Theology Teachers and the appellant be placed Senior than the private respondents on the ground that the merit position of the appellant is high than the private respondents and on the basis of meritorious policy the appellant is rightful/entitled to be placed as Senior than private respondents by correcting the seniority list retrospectively as well as prospectively and this honourable Tribunal may further be pleased that appellant be adjusted as Senior Theology Teacher (BPS-16) with all back benefits from the year 2013 and the instant appeal also against the qua the non-action/order of the appellate authority over the departmental appeal of the appellant.

Dated 15/03/2021

Your humble appellant,

Inamullah

Inamullah
Through counsellor

Sheikh Iftikhar ul Haq

Sheikh Iftikhar ul Haq
Advocate High Court
District Bar Dera Ismail Khan

6

BEFORE THE KPK SERVICES TRIBUNAL, PESHAWAR

In Service Appeal No. _____/2021

Inamullah
(Appellant)

Versus

Govt Of KPK, etc
(Respondents)

AFFIDAVIT

I, **Inamullah**, appellant herein, do hereby solemnly affirm on oath that all parawise contents of the accompanying appeal are true and correct to the best of my knowledge, belief and information; that nothing has been concealed or kept secret from this worthy Tribunal, nor anything contained therein is based on exaggeration or distortion of facts.

Dated 15/03/2021

*Identified by
[Signature]*



[Signature]

DEPONENT

VERIFICATION

Verified on oath at DIKhan, this ____ day of ____, 2021, that all contents of the above appeal are true and correct.

Dated 15/03/2021

[Signature]

Appellant

(1)

BEFORE THE KPK SERVICES TRIBUNAL, PESHAWAR

In Service Appeal No. _____/2020

Inamullah
(Appellant)

Versus

Govt Of KPK, etc
(Respondents)

ADDRESSES OF PARTIES

Appellant:

Inamullah son of Attaullah r/o village Torano, Tehsil & District Tank. Presently serving as STT at Govt. High School Torano, District Tank. Cell#0344-7600145

.....**(APPELLANT)**

-
1. Government of KPK, Through Secretary Elementary & Secondary Education Peshawar
 2. The Director (E&S) Education Khyber Pakhtunkhwa Peshawar.
 3. District Education Officer (Male) Tank.
 4. Misbah ud Din Senior Theology Teacher c/o District Education Officer (Male) Tank.
 5. Momin Khan Senior Theology Teacher c/o District Education Officer (Male) Tank.
 6. Fitratullah Senior Theology Teacher c/o District Education Officer (Male) Tank
 7. Khan Badshah Senior Theology Teacher c/o District Education Officer (Male) Tank
 8. Muhammad Tahir Senior Theology Teacher c/o District Education Officer (Male) Tank
 9. Hameedullah Senior Theology Teacher c/o District Education Officer (Male) Tank
- [Handwritten signature]*

8

10. Muhammad Tahir Shah Senior Theology Teacher c/o District Education Officer (Male) Tank
11. Muhammad Ismail Senior Theology Teacher c/o District Education Officer (Male) Tank
12. Ubaid Anwar Senior Theology Teacher c/o District Education Officer (Male) Tank
13. Inamullah Senior Theology Teacher c/o District Education Officer (Male) Tank
14. Shafiullah Senior Theology Teacher c/o District Education Officer (Male) Tank
15. Muhammad Gulzar Senior Theology Teacher c/o District Education Officer (Male) Tank
16. Azmat Khan Senior Theology Teacher c/o District Education Officer (Male) Tank

..... (RESPONDENTS)

Sheikh
Sheikh
Sheikh
Sheikh

HRX = A

OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS & LITERACY TANK

ORDER:

Consequent upon the recommendation of the Departmental Selection Committee duly approved by chairman/D.C.O Tank, the following candidates being qualified are hereby appointed as Theology Teacher in the schools noted against their names on in BPS-14 (3565-275-11815) plus usual allowances as admissible under the existing recruitment policy on regular basis in the interest of public service w.e.f 01-09-2007 on the following terms & conditions.

OPEN MERIT:

S.No	Name & Address	Father's Name	Domicile	Merit Position	Place of Posting	Remarks
1	Inam Ullah Villige Toran Nau, Tank	Atta Ullah	Tank	63.86	GHS Toran Nau, Tank	Against Vacant Post

TERMS & CONDITIONS:

1. Their service will be considered regular but without pension/gratuity in terms of section-19 of the NWFP Civil Servant Act-1973 as amended by NWFP Civil Servant Act-2005. However, their PST appointed prior the implementation of contract policy will be entitled to pension/gratuity.
2. They will contribute CPF @ 10% of the minimum of the pay @ 10% contribution will be made by the Govt.
3. They will governed by such rules and regulations as may be prescribed by the Govt: from time to time for category of Govt: Servant to which they belong.
4. The appointments of the candidate mentioned above are subject to the condition that they are having domicile of District Tank.
5. Their service will be liable to terminating on one-month notice or resignation with the prior notice one-month pay shall be forfeited.
6. The candidates should join the post within 30 days after 01-09-2007.
7. The original Certificates/Degree should be checked and verified from concerned Board/University/RDE etc.
8. They are required to produce Health & Age Certificate from Medical Superintendent concerned before the taking over charge.
9. Charge should not be given to overage candidates, his case for relaxation is sent to the concerned quarter.
10. They shall required to furnish copies of all their Certificates/Degrees/Asnaad along with the original receipts and their photo copies, they are pertaining to the verification fee of concerned Board/University through concerned Drawing & Disbursing Officer. The letter shall arrange verification of all Certificates/Degrees/Asnaad of the appointee of their respective School / Office and will issue clearance certificate to each appointee for release of his pay.
11. The declaration of assets should be obtained from them immediately & placed on record.
12. Charge Report should be submitted to all concerned.

Attested to be

True copy

(Signature)

(Signature)

(Farid Ullah Khan)
Schools & Literacy, Tank
Executive District Officer,

Endst: No 144-50

Dated _____ Tank

The 11 / 07 / 2007.

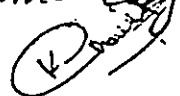
Copy of above is forwarded for Information & necessary action to:

1. The Director Schools & Literacy, NWFP Peshawar.
2. The District Nazim, Tank.
3. The District Coordination Officer, Tank.
4. The District Account Officer, Tank.
5. The Deputy District Officer (M), S & L, Tank.
6. The Principal/Headmaster concerned.
7. The Official concerned.

(Signature)

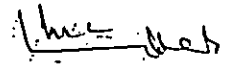
Executive District Officer,
Schools & Literacy, Tank

Annex 2 B

Attested to be true copy


OFFICE OF THE DISTRICT EDUCATION OFFICER (M) TANK
 General Seniority List of TT Teachers (Male)

S.No	Name of Teacher	Acad:	Prof:	SPS	Father, s Name	Date of Birth	Domicile	Date of 1st entry in Govt. Service	Date of Appnt. in the present post	Place of Posting	Remarks
1	Sultan Mahmood										
2	Khan Muhammad	FA	SYafa	15	Noor Muhammad	01/04/1953	Tank	02/02/1953	02/02/1953	G-S Kot Majeem	
3	Abdul Aziz		SYafa	15	Kajal Khan	12/05/1955	Tank	5/12/1974	04/05/1953	G-S Tejori	
4	Iram Baksh	BA	ShAlmia	15	Ghulam Muhammad	28/10/1955	Tank	23/10/1953	23/10/1953	GVS Chadrer	
5	Jan Baz Khan	SSC	ShAlmia	15	Ghulam Sarwar	01/02/1957	Tank	05/12/1955	05/12/1955	GMS Talar	
6	Jan Khan	Arbi Han	SYafa	15	Muhammad Ayub	24/12/1954	Tank	17/12/1950	05/12/1955	GHS Gara Budha	Promoted to B-15 Retired
7	Habib Ur Rehman	SSC	ShAlmia	15	Baz Shah Khan	15/01/1959	Tank	07/12/1955	07/12/1955	G-S Daraid	
8	Ahmad Khan	SSC	SYafa	15	Sahib Noor	10/04/1959	Tank	15/10/1957	15/10/1957	GHS Gara Baloch	
9	Nawab Khan		SYafa	15	Khan Zaman	10/04/1970	Tank	22/10/1957	22/10/1957	GMS Sher Ali	Promoted to B-15
10	Ghulam Farooq	MA	SYafa	15	Khwa's Muhammad	15/09/1955	Tank	25/01/1955	25/01/1959	G-S Gara Shahbaz	
11	Abdul Majeed	SSC	ShAlmia	15	Ahmad Khan	03/01/1963	Tank	20/12/1959	20/12/1959	GCMHS No.1 Tank	
12	Hayat Ullah		ShAlmia	15	Dr. Altaf	15/04/1968	Tank	22/11/1992	22/11/1992	G-S Al Akbar	Promoted to B-15
13	Muhammad Yusaf	Middle	ShAlmia	15	Habib Ullah	19/04/1973	Tank	01/09/1994	01/09/1994	GVS Wanda zalo	Promoted to B-15
14	Noor ul Amin	SSC	SYafa	15	Muhammad Sadiq	12/04/1957	Tank	02/09/1994	02/09/1994	GHS No.2 Tank	
15	Muhammad Khalid	BA	ShAlmia	15	Ghazi Marjan	10/09/1957	Tank	22/11/1994	27/11/1994	GMS Mammaiz Pathan	
16	Muhammad Amin	SSC	SYafa	15	Bahadar sher Khan	01/10/1970	Tank	05/10/1993	05/10/1993	GHS Umar Khel	
17	Abdul Wadood	BA	ShAlmia	15	Ghazi Khan	03/03/1974	Tank	08/04/1999	08/04/1999	GHS Amakhel	Promoted to B-15
18	Shabir Ahmad	SSC	SYafa	15	Wali Khan	01/04/1975	Tank	09/04/1999	09/04/1999	GMS Adaa Umar	
19	Abdur Rauf	BA	SYafa	15	Ghulam Rabani	25/12/1975	Tank	09/04/1999	09/04/1999	GVS Manjhi	Promoted to B-15
20	Hayat Muhammad	SSC	SYafa	15	Ghulam Saeed	02/02/1978	Tank	09/04/1999	09/04/1999	GHS K Khadak	Promoted to B-15
21	Naseeb Ullah	BA	SYafa	15	Noor Muhammad	21/02/1958	Tank	09/04/1999	09/04/1999	GMS Kot Allah Dad	
22	Muhammad Mushlac	MA	SYafa	15	Zafar Khan	02/03/1974	Tank	27/10/1975	31/01/1999	GMS Hayat Khan	
23	Naimat Ullah	SSC	SYafa	15	Ahmed Baksh	08/01/1978	Tank	20/12/1999	20/12/1999	GHS Pai	
24	Fazal Karim	FA	SYafa	15	Saeed Ullah	01/03/1951	Tank	21/12/1999	21/12/1999	GVS Ranwal	Promoted to B-15
25	Bak Ullah	FA	SYafa	15	Fateh Khan	02/03/1957	Tank	21/12/1999	21/12/1999	GHS Kaka khel	
26	Abdul Hameed	BA	SYafa	15	Rahmat Ullah	03/03/1974	Tank	22/12/1999	22/12/1999	GVS Kot Misa	
27	Muhammad Khalid	MA	ShAlmia	15	Inayat Ullah Khan	14/03/1970	Tank	22/12/1999	22/12/1999	GVS Naurang	
28	Muhammad Ilyas	SSC	SYafa	15	Muhammad Maseed	05/05/1975	Tank	23/12/1999	23/12/1999	GVS Wanda zalo	
29	Hizbullah	SSC	SYafa	15	Kousar's Ahmad	02/10/1977	Tank	23/12/1999	23/12/1999	GHS Gul Imam	Promoted to SST
30	Hamid Ullah	SSC	SYafa	15	Shah Benram	16/01/1976	Tank	23/12/1999	23/12/1999	GVS Kot Azam	
31					Muhammad Khan	08/03/1960	Tank	23/12/1999	23/12/1999	GVS Kot Ke	

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S.No	S.L NO	Name of Teacher	Father, s Name	Acad:	Prof:	Place of Posting	Date of Birth	Date of 1st entry in Govt: Service	Date of Apptt: in the present post	Whether Eligible for Upgradation	Remarks
32		Firat Ullah	Abdul Haq	SSC	Sh:Almia	GMS L Michen khel	09-02-1975	01-09-2007	01-09-2007		
33		M.Tahir Shah	Muhammad Khan	SSC	Sh:Almia	GMS Nasran	12-02-1976	01-09-2007	01-09-2007		
34		Azmat Khan	Hassan khan	BA	Sh:Almia	GCMHS No.1 Tank	08-04-1976	24-08-1995	01-09-2007		
35		Shafi Ud Din	Abdul Azim	MA	Sh Almia	GHS Umer Khel	10-08-1976	01-09-2007	01-09-2007		
36		Hamid Ullah	Amran Ullah	BA	S/Yafta	GHS Akbari	08-09-1978	01-09-2007	01-09-2007		
37		Misoon Ud Din	Wali Muhammad	FA	Sh:Almia	GHS No.3 Tank	20/09/1978	01-09-2007	01-09-2007		
38		Muhammad Ismail	Yar Muhammad	SSC	S/Yafta	GriS K.Marwati	01-01-1979	01-09-2007	01-09-2007		
39		Muhammad Gulzar	Muhammad Jan	SSC	Sh:Almia	GMS Barakhel	26-01-1981	01-09-2007	01-09-2007		
40		Muhammad Tahir	Halbat Khan	SSC	Sh:Almia	GMS Nandoor	01-02-1981	01-09-2007	01-09-2007		
41		Momin Khan	Malay Khan	FA	Sh:Almia	GMS Dabara	16-02-1981	01-09-2007	01-09-2007		
42		Ullah Anwar	Muhammad Ibrahim	SSC	S/Yafta	GHS Abizar	05-05-1982	01-09-2007	01-09-2007		
43		Inam Ullah	Atis Ullah	FA	Sh:Almia	GHS Toran Nau	01-03-1983	01-09-2007	01-09-2007		
44		Khan Bad Shah	Muhammad Aslam	FA	S/Yafta	GMS Kot Nawaz	14-04-1984	01-09-2007	01-09-2007		
45		Muhammad Zakria	Shahid Ullah	MA	S/Yafta	GMS Nasran	08-07-1984	01-09-2007	01-09-2007		
46		Khalil Ahmad	Shahid Ullah	SSC	Sh Almia	GMS Tank Cantt	11-10-1984	01-09-2007	01-09-2007		
47		Muhammad Esa	Shahid Ullah	FA	Almia	GHS Bazai	20-03-1985	01-09-2007	01-09-2007		
48		Muhammad Gasim	Shahid Ullah	SSC	Sh Almia	GMS Raghza	09-04-1985	01-09-2007	01-09-2007		
49		Muhammad Ilyas	Qutub Khan	BA	S/Yafta	GHS Sheikh Uttar	08-08-1985	01-09-2007	01-09-2007		
50		Manzoor Ahmad	Ghulam Muhammad	FA	Sh:Almia	GHS Maghza	13-12-1986	01-09-2007	01-09-2007		
51		Aziz ur Rehman	Abdul Sattar	SSC	Sh:Almia		23-03-1987	01-10-2007	01-10-2007		
52		Saif ur Rehman	Obeid Ullah Jan	MA	Sh Almia	GHS Kir. Hader	29-04-1982	04-12-2012	04-12-2012		
53		Muhammad Anwar	M. Aslam Khan	MA	Sh:Almia	GHS Magh-zai	02-02-1985	04-12-2012	04-12-2012		
54		Najeeb Ullah	Said Ahmad	MA	Sh:Almia	GMS Kot Nawaz	14-03-1985	04-12-2012	04-12-2012		
55		Waheed Ullah Khan	Muhammad Azam Khan	MA	Sh:Almia	GMS Chasan kach	14-05-1986	04-12-2012	04-12-2012		
56		Qismat Khan	Ramzan	BA	Sh:Almia	GMS Kot Musa	15-03-1990	04-12-2012	04-12-2012		

It is Certified that all the CTs (Male) included in the panel for the Senior CT B-16

a) Hold the post on regular basis and none of them is holding the post on adhoc/acting charge basis/contract

b) Have completed the required minimum length of qualifying service and qualifications as required for Promotion of CT B-15 to Senior CT B-16 under the rules

c) None of them is on deputation to any organisation under the Federal / Provincial / Autonomous / Semi autonomous / International Organizations

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[Signature]

کھنڈورالورجناب ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) ضلع ٹانک

عنوان :- درخواست نمبر R.T.I-2013 کے تحت ریکارڈ کی طلبی !

جناب عالی!

مؤادمانہ گزارش ہے کہ ہمیں 2007-07-11 کو بطور اسلامیات پتھر بھرتی

ہونے والے مدرسہ ذیل اساتذہ کرام کے First order copies کی فولو کاپیاں

Right to information Act: 2013 کے تحت درکار ہیں -

3: قسرت اللہ (T.T)

2: مومن خان (T.T)

1: صباح الدین (T.T)

6: محمد اللہ (T.T)

5: محمد طاہر (T.T)

4: خان بادشاہ (T.T)

9: عمید اللہ (T.T)

8: محمد اسماعیل (T.T)

7: محمد طاہر شاہ (T.T)

12: محمد گلزار (T.T)

11: شفیع اللہ (T.T)

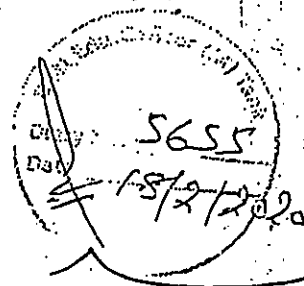
10: انعام اللہ (T.T)

13: عظمت خان (T.T)

آپ صاحبان سے استدعا ہے کہ مدرسہ بالا اساتذہ کرام کی آرڈر کاپیاں

عین نواز من بولی

مدرسہ 17-02-2020



واپس کرے گا حکم صادر فرمائیں -

Charles

03453491922 - GSM سید علی ٹانک (T.T) خلیل ام (T.T)

03439292620 - GSM Tanak (T.T) محمد عیسیٰ

03449870812 - GSM اندری ٹانک (T.T) منظور ام (T.T)

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محمد

محمد

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) TANK

(16)

Final Seniority List of STT (Male) as stood on 31/10/2019

S.No	Name of Teacher	Father's Name	Acad.	Prof.	BA/BSc Divi:	Place of Posting	BPS	Date of Birth	Date of 1st entry in Govt. Service	Date of Apptt. in the present post	Date of Apptt. in the present Grade	Remarks
1	Ghulam Farooq	Ahmad Khan	MA	S/Yafta								
2	Abdul Majid	Qil Afza	SSC	Sh.Almia		GHS M. Akbar	15	02-01-1953	22-11-1992	22-11-1992	21-02-2013	
3	Shahir Ahmad	Ghulam Rabani	SSC	S/Yafta		GSSNCMHS No.1 Tank	16	19-04-1928	01-09-1994	01-09-1994	21-02-2013	
4	Muhammad Mushtaq	Ahmad Bakhsh	MA	S/Yafta		GHS K. Khadok	16	25-12-1975	05-04-1999	06-04-1999	21-02-2013	
5	Muhammad Gulzar	Muhammad Jan	SSC	Sh.Almia		GHS Gara Shahbaz	16	08-01-1978	21-12-1999	21-12-1999	30-05-2013	
6	Shah Ud Din	Abdul Azim	MA	Sh.Almia		GHS Ranwal	16	20-01-1951	01-09-2007	01-09-2007	30-05-2013	
7	Misbah Ud Din	Wali Muhammad	FA	Sh.Almia		GHS Umer Khel	16	05-09-1976	01-09-2007	01-09-2007	30-05-2013	
8	Moin Khan	Malay Khan	FA	Sh.Almia		GHS Ama Khel	16	20-09-1978	01-09-2007	01-09-2007	30-05-2013	
9	Firat Ullah	Abdul Haq	SSC	Sh.Almia		GHS Gul Imam	16	16-02-1981	01-09-2007	01-09-2007	30-05-2013	
10	Muhammad Tahir	Haibat Khan	BA	Sh.Almia	1st Divi	GHS No 2 Tank	16	09-02-1975	01-09-2007	01-09-2007	30-05-2013	
	Tahir Shah	Muhammad Khan	SSC	Sh.Almia		GHS Danaki	16	01-02-1981	01-09-2007	01-09-2007	23-05-2013	
	Aman Ullah	Aman Ullah	BA B Ed	Sh.Almia B.Ed	2nd Divi	GHS Akbari	16	12-02-1976	01-09-2007	01-09-2007	30-05-2013	
13	Muhammad Ismail	Yar Muhammad	SSC	S/Yafta		GHS K Marwali	16	05-09-1978	01-09-2007	01-09-2007	30-05-2013	
14	Usaid Anwar	Muhammad Ibrahim	SSC	S/Yafta		GHS No.3 Tank	16	01-01-1979	01-09-2007	01-09-2007	30-05-2013	
15	Inam Ullah	Alta Ullah	BA	Sh.Almia		GHS Teran Nau	16	05-05-1992	01-09-2007	01-09-2007	18-11-2014	
16	Fayat Ullah	Habib Ullah	SSC	Sh.Almia		GHS No 2 Tank	16	01-03-1953	01-09-2007	01-09-2007	15-11-2014	
17	Fayat Ullah	Habib Ullah	SSC	Sh.Almia		GHS No 2 Tank	16	15-04-1973	08-09-1994	03-09-1994	09-02-2017	

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(13)

AYX 21 C

17	Najeeb Ullah	Zafar Khan	MA Isl	S/Yafta B.Ed							
18	Khan Bad Shah	Muhammad Aslam	FA	S/Yafta		GHS Paj	16	02-03-1974	20-12-1999	20-12-1999	20-03-2017
19	Muhammad Amin	Ghazi Khan	MA B.Ed	S/Yafta B.Ed	2nd Divi	GHS Maghzei	15	14-04-1984	01-03-2007	01-03-2007	03-03-2017
						GHS Adda Umar	16	03-03-1974	02-04-1999	03-04-1999	22-02-2019

Note:- Senoirity list has been updated, keeping in view inter- Se-Seniority of the employees in the lower post.

Chairman
Muhammad Salim Principal
GSSNCMHS No.1 Tank

[Signature]
09/11/19

V/Chairman
Gohar Zaman Principal
GHS Gara Baloch

[Signature]

Member
Rehmat Ullah Headmaster
GHS Kaka Khel

[Signature]

D/Assistant
Ahmad Nawaz S/Clerk

[Signature]
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[Signature]

Endst No. 8361-62

Dated Tank the 01/01/2020

- Copy for to:
- 1 The Director E & SE khyber Pakhtunkhwa Peshawar.
 - 2 The Dy: District Education Officer (M) Tank

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[Signature]

[Signature]
District Education Officer (M)
Tank

14

بخدمت جناب ڈائریکٹر ایلیمینٹری اینڈ سیکنڈری ایجوکیشن خیبر پختونخواہ پشاور

حکمانہ اپیل برائے Promot کئے جانے سائل بطور STT از مورخہ 30/05/2013

تصحیح فرمائے جانے سینیاریٹی لسٹ برائے (دینیات ٹیچر) Theology Teacher

از سال 2013

جناب عالی! سائل حسب ذیل عرض رساں ہے۔

- ۱۔ یہ کہ سائل محکمہ تعلیم ٹانک میں بطور Theology Teacher، BPS-14 مورخہ 11/07/2007 میں تعینات ہوا اور از تعیناتی اپنے فرائض منصبی احسن طریقے سے سرانجام دیتا چلا آ رہا ہے۔
- ۲۔ یہ کہ مورخہ 18/11/2014 کو سائل کو بطور STT (BPS-16) ترقی دی گئی۔ اگرچہ من اپیلانٹ کو بمطابق سینیاریٹی مورخہ 30/05/2013 سے بطور STT (BPS-16) ترقی ملنی چاہئے تھے کیونکہ من اپیلانٹ اپنے Colleagues جو کہ اپیلانٹ کے ساتھ بھرتی ہوئے تھے، کو مورخہ 30/05/2013 کو ترقی دی گئی تھی۔ اگرچہ من اپیلانٹ اپنے Colleagues کو رین سے Merit میں High پوزیشن پر براہمان تھا اور سروس قواعد و ضوابط کے مطابق میرٹ پوزیشن پہ High امیدواران ملازمین سے سینئر ہے جو کہ عمر میں بڑے ہیں۔ مذید یہ کہ محکمہ تعلیم ٹانک نے جدید سینیاریٹی لسٹ شائع کردہ 2020-21 میں تصحیح فرما کر اپیلانٹ کو درست جگہ پر ایڈجسٹ کر دیا ہے۔

لہذا استدعا ہے کہ بمنظوری حکمانہ اپیل ہذا من اپیلانٹ کو بطور STT (BPS-16) مورخہ 30/05/2013 سے ترقی دی جائے اور درست سینیاریٹی لسٹ کے مطابق اپیلانٹ کی وادرسی فرمائی جائے تاکہ انصاف کے تقاضے پورے ہو سکیں۔

مورخہ 01/12/2020

انعام اللہ STT گورنمنٹ ہائی سکول توران ٹانک رابطہ نمبر 0344-7600145

Ma Mat

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17

Directorate of Elementary and Secondary Education

Khber Pakhtunkhwa Peshawar

PH No. 091-9210389-92103938

Fax 091-9210936- 0800-33857

Email. rafiq_kk851 yahoo.com

Notification:-

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No SO(B&A)/1-18/E&SE/2012 dated 12-07-2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16-07-2012 the following Male TTs B-15 are hereby promoted to the post of Senior TT BPS-16 (Rs. 10000-800-34000) plus usual allowances as admissible under the rules in regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will posted in the Government Higher Secondary/ High Schools by the District Education Officers concerned against the newly upgraded senior TT BPS-16 posts.

Total No. of TT (Male) duly verified bt the DAO	56
1/3'share of senior TT Posts	19
Share of promotion 100%	19
Already Promoted to the post of STT B-16	06
Posts available for promotion	13
Promoted to the post of STT B-16	12

S.No	S.No	Name of Teacher	Previous place of posting	Date of Birth	Remarks
1	19	Abdul Wadood	GMS Manjhi	01/04/01975	Services placed at the disposal of DEO (Male) Tank for further posting
2	23	Muhammad Mushtaq	GHS Ranwal	08/01/1978	----Do----
3	28	Muhammad Khalid	GHSS Gul Imam	05-06-1976	----Do----
4	35	Fitrat Ullah	GMS I Michin Khe	09-02-1975	----Do----
5	34	M Tahir Shah	GMS Nasran	12-02-1976	----Do----
6	34	Azamt Khan	GCM HS No. 1 Tank	08-04-1976	----Do----
7	35	Shafi Ud Din	GHS Umar Khel	10-08-1970	----Do----
8	36	Hameed Ullah	GHS Akbari	08-09-1978	----Do----
9	37	MisbaH Ud Din	GHS No. 3 Tank	20-09-1978	----Do----
10	38	Muhammad Ismail	GHS K. Marwati	01-01-1979	----Do----
11	39	Muhammad Gulzar	GMS Bara Khel	26-01-1981	----Do----
12	40	Muhammad Tahir	GMS Nandoor	04-02-1981	----Do----
13	41	Momin Khan	GMS Dabara	16-02-1981	----Do----

Terms and conditions

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be preceded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Se-Seniority on lower post will remain intact.



Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 938,
9210437, 9210957, 210408
Fax: 091-9210936, 091-921033857
E-mail rafiq_kk851@yahoo.com

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa, Elementary and Secondary Education Notification Nos (B&A)/1-18/E&SE/2012 dated 11/07/2012 and Finance Department Endorsement No SO (FR)/19/10-22(E)/2010 dated 16/07/2012, the following Male TTs B-15 are hereby promoted to the post of Senior TT BPS-16 (Rs.10000-3000-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior TT BP :-16 posts:-

Total No. of TT (M) Posts duly verified by the DAO	56
1/3 share of Senior TT Posts	19
Share of promotion 100 %	19
Already promoted to the post of STT B-16	06
Posts available for promotion	13
Promoted to the post of STT B-16	13

S.No	S.No	Name of Teacher	Place of Posting	Date of Birth	Remarks
1	19	Akbar Wadood	GMS Manghi	01/01/1975	Services placed at the disposal of DEO (M) Tank for further posting.
2	23	Muhammad Mushtaq	GHS Ramwal	08/01/1978	Do
3	28	Muhammad Khalid	GHS Gul Imam	05/06/1976	Do
4	33	Fatrat Ullah	GMS L. Michen Khel	09/02/1975	Do
5	34	M. Tahir Shah	GMS Nasran	12/02/1976	Do
6	34A	Azmat Khan	GCMHS No.1 Tank	08/01/1976	Do
7	35	Shaji Ud Din	GHS Umar Khel	10/03/1976	Do
8	36	Hamid Ullah	GHS Akbari	08/09/1978	Do
9	37	Misbah Ud Din	GHS No.3 Tank	20/09/1978	Do
10	38	Muhammad Ismail	GHS K. Marwati	01/01/1979	Do
11	39	Muhammad Gulzar	GMS Barakhel	26/01/1981	Do
12	40	Muhammad Tahir	GMS Nandour	01/02/1981	Do
13	41	Momin Khan	GMS Dabara	16/03/1981	Do

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 Govt.
- Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he 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.

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[Signature]

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18



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) TANK

OFFICE ORDER:-

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No SO(B&A)/1-18/E&SE/2012 dated 12-07-2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16-07-2012 the following Male TTs B-15 are hereby promoted to the post of Senior TT BPS-16 (Rs. 10000-800-334000) plus usual allowances as admissible under the rules in regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and they are being posted in GHSS/GHS as mentioned against each.

S.No	S.No	Name of Teacher	Previous place of posting	Posted at	Remarks
1	42	Ubaid Anwar	GMS Nandoor	GHS Pai	A/V Post
2	43	Inam Ullah	GHS Toran Nau	GHS Toran Nau	A/V Post
3	44	Khan Bad Shah	GMS Kot Nawaz	GHS Kot Hakeem	A/V Post

Adjustments:

S.No	Name of Teacher	Present place of posting	Posted at	Remarks
1	Najeeb Ullah TT	GHS Pai	GMS Nandoor	A/V Post
2	Sultan Mehmood TT	GHS Kot Hakeem	GMS Kot Nawaz	A/V Post

Terms and conditions

1. S.No 1 to S.No.03 will be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be preceded under the rules framed from time to time.
4. They are posted "School Based" & their services are non-transferable.
5. Charge report should be submitted to all concerned.
6. Their Inter-Se-Seniority on lower post will remain intact.
7. No TA/DA is allowed for joining his duty.
8. They will give an under taking to be recorded in their service book to the effect that if any overpayment is made to him light this order will be recovered and if he is wrongly promoted he will be reversed.

(Abdus Salam Khan)
District Education Officer (Male)
Tank

Endst: No. 10240-45/DEO(M)

the 18/11/2014

Copy forwarded for information and necessary action to the:-

1. The Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. The Dy: District Education Officer (Male) Tank.
3. The director Account Officer Tank.
4. The Principal /Headmasters Concerned.
5. Teachers Concerned.
6. PA File

(Abdus Salam Khan)
District Education Officer (Male)
Tank

18

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) TANK

OFFICE ORDER:-

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 10.07.2010, the following Male TTs B-15 are hereby promoted to the post of Senior TT BPS-16 (B.S. No. 500-27000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and they are being posted in GHSS/GHS as mentioned against each.

S.No	S.No	Name of Teacher	Previous Place of Posting	Posted at	Remarks
1	42	Ubaid Anwar	GMS Nandoor	GHS Pai	A/V Post
2	47	Inamullah	GHS Toran Nau	GHS Toran Nau	A/V Post
3	48	Ekan Bad Shah	GMS Kot Nawaz	GHS Kot Hakeem	A/V Post

Adjustments

S.No	Name of Teacher	Present Place of Posting	Posted at	Remarks
4	Najibullah TT	GHS Pai	GMS Nandoor	A/V Post
5	Subhan Mahmood TT	GHS Kot Hakeem	GMS Kot Nawaz	Vice S.No. 3

Terms and conditions:-

- S.No. 1 & 2 will 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 Govt.
- Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
- They are posted "School based" & their services are non-transferable.
- Charge report should be submitted to all concerned.
- Their Inter-Ser seniority on lower post will remain intact.
- No TA/DA is allowed for joining his duty.
- They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.

Attested to be true copy
Majid

(Abdus Salam Khan)
District Education Officer (Male)
Tank

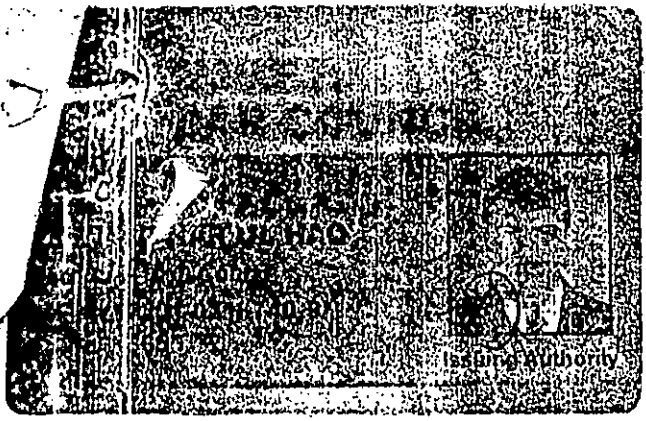
Encls: No. 45 / DEO(M)

th 18/11/14

Copy forwarded for information and necessary action to the:-

- The Director E&SE Khyber Pakhtunkhwa, Peshawar.
- The Dy. District Education Officers (M) Tank.
- The District Accounts Officer Tank.
- The Principals/Headmasters Concerned.
- Teachers Concerned.
- PA/PP.

(Abdus Salam Khan)
District Education Officer (Male)
Tank



وکالت نامہ

کورٹ فیس		قیمت ایک روپیہ
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Before the K.P.K Service Tribunal Peshawar

Appellant: مخائب
Inamullah vs Govt of K.P.K
 Service Appeal
 دعویٰ یا جرم
 تفصیل دعویٰ یا جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے پیروی و جوابدہی برائے پیشی یا تصفیہ مقدمہ D.I-Kh کیلئے

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے، کہ میں ہر پیشی پر خود بذریعہ اختیار خائن رد و عدالت حاضر ہوتا ہوں گا۔ اور ہر وقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا، اگر پیشی پر منظر حاضر نہ ہوں۔ اور مقدمہ میری غیر ماضی کی وجہ سے کسی طور پر میرے برخلاف ہو گیا۔ تو صاحب موصوف اسکے کسی طرح ذمہ دار نہ ہوں گے، نیز وکیل صاحب موصوف صدر مقام کپہری کے علاوہ کسی جگہ یا کپہری کے اوقات سے پہلے یا چھپے یا بروز تظلیل ہیروئی کرنے کے ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کپہری کے علاوہ کسی جگہ یا کپہری کے اوقات سے پہلے یا چھپے یا بروز تظلیل ہیروئی کرنے کے ذمہ دار نہ ہوں گے۔ اور مقدمہ صدر کپہری کے علاوہ اور جگہ ساعت ہونے یا بروز تظلیل یا کپہری کے اوقات کے آگے چھپے پیش ہونے پر منظر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا عیانت واپس کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ جہ کوکل سامنے پروا اٹھ صاحب موصوف عمل کر وہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ یا اجواب دعویٰ یا درخواست اجراءے ذکری و نظر ثانی اپیل کمرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ذمہ نہ کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر غائبی یا راشی نامہ دینے اور حلف کرنے، اقبال دعویٰ کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیش مقدمہ مذکورہ میں ان ذمہ داریوں کو مقدمہ مذکورہ نظر ثانی اپیل کمرانی و کمرانی و کمرانی و مقدمہ یا منسوی ذمہ داری کی طرف۔ یا درخواست حکم انتہائی یا قریبی یا کمرانی کمرانی از فیصلہ اجراءے ذمہ داری صاحب موصوف کو بشرط ادا کیلئے ملحدہ ملحدہ ہیروئی کا اختیار ہوگا اور تمام سامنے پروا اٹھ صاحب موصوف عمل کر وہ ذات خود منظور قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو کی کاروائی یا بصورت درخواست نظر ثانی اپیل یا کمرانی یا دیگر معاملہ مقدمہ مذکورہ کی دوسرے وکیل یا ایئر سٹرکاپ سے بجائے یا اپنے ہمراہ مقرر کریں۔ اور ایسے شیر قانون کو بھی ہر امر میں وہی اور دیکر اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جو کچھ ہر جائزہ التواء پڑے گا، وہ صاحب موصوف کا حق ہوگا۔ مگر صاحب موصوف کو اپنی نہیں تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو ہر اختیار ہوگا کہ وہ مقدمہ کی ہیروئی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھو یا ہے۔ تاکہ سند ہے
 15 مارچ 2021ء
 2021

مضمون وکالت نامہ سن لیا ہے۔ اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

العبد
 العبد
 العبد

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR CAMP,

DERA ISMAIL KHAN.

Service Appeal No. 4841/2021

Inam ullah **VERSUS** *Govt. of KPK*

Govt. of KPK through Secretary Education etc

WRITTEN REPLY ON BEHALF OF RESPONDENT NO. 4, 5, 6, 8, 9,

10, 11, 12, 14, 15, 16.

Respectfully:-

Preliminary Objection:-

1. That appellant has no cause of action.
2. That appellant have no locus Standi.
3. That present appeal is hopelessly time barred.
4. That this Honourable Court have no jurisdiction to entertain the present appeal.
5. That proceeding in instant appeal would be futile exercise the precious time of parties and Honourable Tribunal.
6. That the respondents correctly promoted according to seniority list and prevail Seniority and promotion service rules and policies.

Written Reply on Facts:-

1. That Para pertains to record hence no reply.
2. That Para No.2 of appeal is right only to the extent of issuance of seniority list of Theology teaches in year 2013 by official respondents. The present respondents right^{ly} promoted according to service rules and prevail policy and appellant was not eligible for promotion.
3. That Para No.3 of appeal is incorrect and only fabricated story narrated which have no force, therefore the present appeals incompetent and not maintainable and liable to dismiss.

4. That the Para No. 4 of appeal pertains to record, hence no reply.

5. That the Para No.5 of appeal, pertain to record ^{and} ~~is~~ hopelessly time barred and liable to dismissed, without further proceeding.

6. That the Para No.6 of appeal is incorrect hence not admitted.

Grounds:-

a. Para a of grounds not admitted and belong to record hence no reply.

b. That appellant have not occurred in year 2013 for promotion as Theology teacher hence refused.

c. That respondent's right fully showed senior and fit for promotion in higher grade and promoted according to service rules and policies.

d. That Para (d) of grounds is incorrect hence refused.

e. That the present Honourable Tribunal have no jurisdiction and ample powers to entertain time barred and fruitless appeal.

f. That Para (f) of appeal is legal.

PRAYERS:-

IT IS THEREFORE HUMBLY PRAYED THAT THE INSTANT APPEAL OF APPELLANT BE DISMISSED WITH COST.

Respondents:- _____

Date:- 25/11/2021

through Counsel

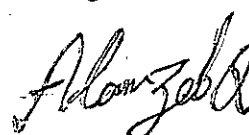


CERTIFICATE

Certified that all contents of reply are correct to the best of my knowledge.

Respondents:- _____

Through Counsel



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

Service Appeal No. 4841/2021

Inam Ullah

Versus

Govt. of K.P.K and Others

REPLY ON BEHALF OF RESPONDENTS NO.1,2,3

RESPECTFULLY SHEWETH:

PRELIMINARY OBJECTIONS

1. That the appellant has got no cause of action and locus standi.
2. That the appellant is estopped to sue due to his own conduct.
3. That the appeal of appellant is badly time barred.
4. That the appeal is not maintainable in its present form.
5. That the appeal in hand is a weak case and has no legal force.
6. That the appellant deliberately concealed the material fact from this honorable Tribunal.
7. That the appellant does not come to this Honorable Tribunal with clean hands.
8. That the appellant is not entitled for any relief from this learned Tribunal.
9. That the appeal is bad for mis-joinder and non-joinder of necessary parties.

REPLY ON FACTS

1. That Para No.01 is correct to the extent that appellant was appointed as theology teacher (TT) on 11-07-2007 but rest of the para pertains to record, which needs verification.
2. That Para No . 02 is correct to the extent of issuance of seniority list of Theology Teacher (TT) in year 2013 by the respondent no 03 . The seniority list was rightly displayed and appellant had not made any objection. The private respondents were promoted on the basis of 2013 seniority list. The appellant was also promoted in 16-11-2014 on the basis of the same seniority list. The appellant has challenged the seniority list of 2013 after a long period of 08 year . Therefore the appeal of the appellant is badly time barred . (copy of promotion order of private Respondent and appellant are annexed as "A" and "B" respectively)
3. That Para No. 03 of the appeal is incorrect. The relevant record was provided to the appellant on his request, which is evident from his promotion order.
4. That Para.No.04 is incorrect. After 2014, the appellant was working as senior Theology Teacher (STT) and Respondent no .03 issued / displayed seniority list of the senior theology teacher (STT) according to the ruled and policy in 2020 and the appellant has not raised any objection on seniority list of STT . (copy of seniority list of STT displayed in 2020 is annexed as "C")
5. That Para.No .05 is incorrect and not admitted, the appellant challenged the seniority list of 2013 on 01-12-2020, which is badly time barred .
6. That Para No .06 is incorrect. The appellant was not aggrieved from seniority list and rightly promoted as SFT.

REPLY ON GROUNDS.

- a. That Para No. "a" is incorrect and not admitted . The appellant challenged the seniority list of 2013 on 01-12-2020, which is badly time barred . The appellant was rightly promoted to the senior Theology Teacher in 2014 on the basis of 2013 seniority list .
- b. That Para No. "b" is incorrect . The appellant was placed at right place in seniority list of 2013 because he was promoted to senior Theology Teacher in 2014 on the basis of same seniority list, which is evident from his promotion order dated 16-11-2014.

- c. The Para No."c" is in correct. The competent authority promoted all private Respondents and appellat according to rules and policy.
- d. That Para No."d" is incorrect and not admitted .The appellat was promoted according to rules and policy.
- e. As the appeal of the appellat is badly time barred because the appellat has challenged the Seniority List after period of 08 Years.
- f. The Counsel for Respondents may also be allowed to raise additional grounds at the time of arguments.

It is humbly prayed that the service appeal of appellat may please be dismissed with cost.



Secretary E&SE Department
Khyber Pakhtunkhwa, Peshawar
(Respondent No.01)



Director Elem: & Secondary Education
Khyber Pakhtunkhwa Peshawar
Respondent No.02



District Education Officer
(Male) Tank
Respondent No. 03

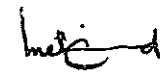
**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
D.IKHAN BENCH**

Service Appeal No. 4841/2021

Inam Ullah VS Government of Khyber Pakhtunkhwa and others

AFFIDAVIT

I Mahmood Azam Assistant District Education Officer(Litigation) o/o 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.



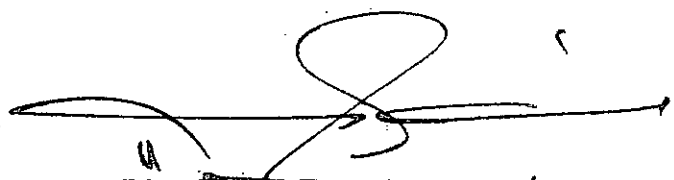
DEPONENT

12201-0313189-7

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) TANK

AUTHORITY LETTER

Mr. Mehmood Azam Assistant District Education Officer (Litigation) Office of the DEO (Male) Tank is hereby authorized to attend the Honorable Khyber Pakhtunkhwa Service Tribunal Camp Court DIKhan in Service Appeal No. 4841/2021 Titled as "Mr. Inam Ullah Vs Govt. of KPK & Others" on behalf of the undersigned.



District Education Officer
(Male) Tank
Respondent No. 03

6

TTs (M) Tank II



Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar

PH No. 091-9210389, 9210437, 9210957, 210468
Fax: 091-9210936, 091-921033857
E-mail rafiq_kk851@yahoo.com

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No SO(B&A)/1-18/E&S/E/2012 dated 16/07/2012 and Finance Department Endorsement No SO(FR/11/10-22(B)/2010 dated 16/07/2012, the following Male TTs B-15 are hereby promoted to the post of Senior TT BPS-16 (Rs.10000-300-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior TT BPS-16 posts:

Total No. of TT (M) Posts duly verified by the DAO	56
1/3 share of Senior TT Posts	19
Share of promotion 100 %	19
Already promoted to the post of STTB-16	06
Posts available for promotion	13
Promoted to the post of STTB-16	13

S.No	S.No	Name of Teacher	Place of Posting	Date of Birth	Remarks
1	19	Abdul Wadood	GMS Manjhi	01/04/1975	Services placed at the disposal of DEO (M) Tank for further posting.
2	23	Muhammad Mushtaq	GHS Ranwal	08/01/1978	Do
3	28	Muhammad Khalid	GHS Gul Imam	05/06/1976	Do
4	33	Firat Ullah	GMS L. Michen. Khel	09/02/1975	Do
5	34	M. Tahir Shah	GMS Nasran	12/02/1976	Do
6	34A	Azmat Khan	GCMHS No.1 Tank	08/04/1976	Do
7	35	Shafi Ud Din	GHS Umer Khel	10/08/1976	Do
8	36	Hamid Ullah	GHS Akbari	08/09/1978	Do
9	37	Misbah Ud Din	GHS No.3 Tank	20/09/1978	Do
10	38	Muhammad Ismail	GHS K. Marwati	01/01/1979	Do
11	39	Muhammad Gulzar	GMS Barakhel	26/01/1981	Do
12	40	Muhammad Fahir	GMS Nandour	01/02/1981	Do
13	41	Momin Khan	GMS Dabara	16/02/1981	Do

Terms and conditions:-

- They should 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 Govt.
- Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the strict charge report should be submitted to all concerned.
- Their Inter-Se- seniority on lower post will remain intact.

Attested to be true copy

Imam

⑦

B



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) TANK

OFFICE ORDER:-

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Male TTs B-15 are hereby promoted to the post of Senior TT BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and they are being posted in GHSS/GHS as mentioned against each.

S.No	S.No	Name of Teacher	Previous Place of Posting	Posted at	Remarks
1	42	Ubaid Anwar	GMS Nandoor	GHS Pai	A/V Post
2	43	Inam ullah	GHS Toran Nau	GHS Toran Nau	A/V Post
3	44	Khan Bad Shah	GMS Kot Nawaz	GHS Kot Hakeem	A/V Post

Adjustments

S.No	Name of Teacher	Present Place of Posting	Posted at	Remarks
1	Najeeb Ullah TT	GHS Pai	GMS Nandoor	A/V Post
2	Sultan Mehmood TT	GHS Kot Hakeem	GMS Kot Nawaz	Vice S.No.3

Terms and conditions:-.

1. S.No.1 to S.No.3 will be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be preceded under the rules framed from time to time.
4. They are posted "School based" & their services are non-transferable.
5. Charge report should be submitted to all concerned.
6. Their Inter-Se- seniority on lower post will remain intact.
7. No TA/DA is allowed for joining his duty.
8. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.

(Abdus Salam Khan)
District Education Officer (Male)
Tank

Endst: No. 10040-45/DEO(M)

Copy forwarded for information and necessary action to the:-

1. The Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. The Dy: District Education Officers (M) Tank.
3. The District Accounts Officer Tank.
4. The Principals/Headmasters Concerned.
5. Teachers Concerned.
6. PA File.

(Abdus Salam Khan)
District Education Officer (Male)
Tank

Page C

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) TANK

(16)

Final Seniority List of STL (Male) as stood on 31/10/2019

S.No	Name of Teacher	Father's Name	Acad.	Prof.	BA/SSC Divi.	Place of Posting	GPS	Date of Birth	Date of 1st entry in Govt. Service	Date of Appt. in the present post	Date of Appt. in the present Grade	Remarks
1	Ghulam Farooq	Ahmed Khan	MA	S/Yafta		GHS M. Akbar	16	03-01-1952	22/11/1992	22/11/1992	21-02-2013	
2	Abdul Majeed	Qil Afza	SSC	Sh. Almia		GSSNCMHS No. 1 Tank	16	19-04-1958	01-09-1994	01-09-1994	21-02-2013	
3	Shabir Ahmed	Ghulam Rabani	SSC	S/Yafta		GHS K. Khadak	16	25-12-1975	05-04-1999	08-04-1999	21-02-2013	
4	Muhammad Mushtaq	Ahmad Bakhsh	MA	S/Yafta		GHS Gara Shahbaz	16	08-01-1978	21-12-1999	21-12-1999	30-05-2013	
5	Muhammad Gulzar	Muhammad Jan	SSC	Sh. Almia		GHS Ranwal	16	26-01-1931	01-09-2007	01-09-2007	30-05-2013	
6	Shah Ud Din	Abdul Azim	MA	Sh. Almia		GHS Umer Khel	16	10-09-1976	01-09-2007	01-09-2007	30-05-2013	
7	Misbah Ud Din	Wali Muhammad	FA	Sh. Almia		GHS Ama Khel	16	20/09-1978	01-09-2007	01-09-2007	30-05-2013	
8	Mohsin Khan	Malay Khan	FA	Sh. Almia		GHS Gai Imam	16	16-02-1981	01-09-2007	01-09-2007	30-05-2013	
9	Firrat Ullah	Abdul Haq	SSC	Sh. Almia		GHS Mullazai	16	09-02-1975	01-09-2007	01-09-2007	30-05-2013	
10	Muhammad Tahir	Haibat Khan	BA	Sh. Almia	1st Divi	GHS No 3 Tank	16	01-02-1981	01-09-2007	01-09-2007	30-05-2013	
	Tahir Shah	Muhammad Khan	SSC	Sh. Alia		GHS Danaki	16	12-02-1976	01-09-2007	01-09-2007	30-05-2013	
	Aman Ullah	Aman Ullah	BA B. Ed	Sh. Alia B. Ed	2nd Divi	GHS Akbari	16	05-09-1978	01-09-2007	01-09-2007	30-05-2013	
11	Muhammad Israil	Yar Muhammad	SSC	S/Yafta		GHS K Marwail	16	01-01-1979	01-09-2007	01-09-2007	30-05-2013	
12	Ubaid Anwar	Muhammad Ibrahim	SSC	S/Yafta		GHS No. 3 Tank	16	05-05-1982	01-09-2007	01-09-2007	18-11-2014	
	Saim Ullah	Alfa Ullah	BA	Sh. Almia		GHS Teran Nau	16	01-03-1983	01-09-2007	01-09-2007	15-11-2014	
	Haris Ullah	Habib Ullah	SSC	Sh. Almia		GHS No. 2 Tank	16	19-04-1973	08-09-1994	03-09-1994	05-02-2017	

Attested to be true copy
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(9) c

17	Najeeb Ullah	Zafar Khan	MA Isl	SYafia B.Ed		GHS Par	16	02-03-1974	20-12-1999	20-12-1999	09-09-2017
18	Khan Bad Shah	Muhammad Aslam	FA	SYafia		GHS Maghza	16	14-04-1934	01-09-2007	01-09-2007	09-06-2017
19	Muhammad Amin	Ghazi Khan	MA B.Ed	SYafia B.Ed	2nd Divi	GHS Adda Umar	16	03-03-1974	08-04-1999	06-04-1999	22-02-2019

Note:- Senoirity list has been updated, keeping in view inter-Se-Seniority of the employees in the lower post.

Chairman
Muhammad Salim Principal
GSSNCMHS No.1 Tank

[Signature]
09/11/19

V/Chairman
Gohar Zaman Principal
GHS Gara Baloch

[Signature]

Member
Rehmat Ullah Headmaster
GHS Kaka Khel

[Signature]

D/Assistant
Ahmad Nawaz S/Clerk

[Signature]

Attested to be
true copy
[Signature]

Endst No. 8361-62

Dated Tank the 01/01/2020

- Copy for to:
- 1 The Director E & SE khyber Pakhtunkhwa Peshawar.
 - 2 The Dy: District Education Officer (M) Tank

Attested to be
true copy.
[Signature]

[Signature]
District Education Officer (M)
Tank

(14)

"A"

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

No.

APPEAL No. 4841 of 20 21

Imamullah

Appellant/Petitioner

Versus

Imamli Say (F&SE) Post

RESPONDENT(S)

P. Resp. No 7

Notice to Appellant/Petitioner Khan Badshah STT c/o

DEO (M) Tank s/o M. Aslam No

GHSS Maghzi No Vill Amakhel

Tank

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 24-1-22 at 8.00 AM

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

at conf Court

D/Kh

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

TB DIK

APPEAL No.....4841..... of 20 21

(Name of the)

Appellant/Petitioner

Versus

Sery: (ERSE) Pesh

RESPONDENT(S)

P. Resp; No. 8

Notice to Appellant/Petitioner M. Tanvir STT C/O

DEO (M) Tank S/O

Hai bad Khan GHS NO 3 Tank A/O Vill.

Mandoor P/O Pai Teh 8 Dist Tank

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 24-1-22 at 8 AM

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

at camp court

D/10/11

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No. of 20

TRB DHC
21

Mamun Ullah

Appellant/Petitioner

Versus

Sing. (EBSSE) Raja

RESPONDENT(S)

Notice to Appellant/Petitioner

Re-Resp. of
Hamidullah STT Eto
DEO (M), Tank
No. Amanullah STT GHS Akbari Vill. Akbar
Tank

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

on 24-1-22 at 8:00 AM

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

at camp court
DHC

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No. 4841 of 20 21

TB D/KC

Inam Ullah

Appellant/Petitioner

Versus

Sery: Edm: (EGSE) Pesh

RESPONDENT(S)

P. Resp: NO 10

Notice to Appellant/Petitioner

Mohammad Takur Shah

SIT S/O Mohammad Khan SST GHS Dasaki

R/o Gaseeb Abad Vill: Akbari Tank

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 24-1-22 at 9:00 AM

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

at camp court

D/KC

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No. of 20

4841

TB DHC
21

Inam Ullah

Appellant/Petitioner

Versus

Sery: (E & SE) Edu. Pesh

RESPONDENT(S)

P. Resp. No 11
Notice to Appellant/Petitioner Mohammad Ismail STT
S/o Yous Mohammad GHS Karri Marwati
R/o Rehmat Abad Tehsil Dist Tank

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 24-1-22 at 8.00 AM

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

at camp Court

DHC

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No. 484 of 20

TRB D10
21

Imam Ullah

Appellant/Petitioner

Versus

Sony. Edu. Dept

RESPONDENT(S)

P. Resp. No 12
Notice to Appellant/Petitioner

Ubaid Ullah Anwar

STT S/o Mohammad Ibrahim GHS Tajori

Tank P/o Ghorib Abad P/o Rai

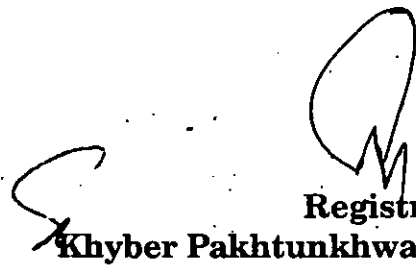
Tehsil Dist Tank

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 24-1-22 at 8:00 AM

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

at Camp Court

D/Ku



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

4841

TB D/K
21

APPEAL No..... of 20

Inam Ullah

Appellant/Petitioner

Versus

Sery. (E2SE) Pesh

RESPONDENT(S)

P. Resp; No 13

Inam Ullah STT S/O

Notice to Appellant/Petitioner

Atta Ullah GHS Toran No Vill:

Toran Teh & Dist Tank

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 21-1-22 at 8:00 AM

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

at Camp Court

D/Kh

S

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.