

28th September, 2022

Learned counsel for the appellant present. Dr. Muhammad Khalid, Instructor alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant stated at the bar that similar nature service appeals have been fixed on 27.10.2022, therefore, instant appeal may also be fixed on the said date. Adjourned. To come up for arguments on 27.10.2022 before the D.B at Camp Court D.I.Khan.



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

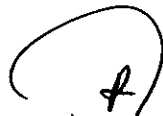


(Kalim Arshad Khan)
Chairman
Camp Court D.I.Khan

27th Oct 2022

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

Learned counsel for the appellant seeks adjournment on the ground that he has not prepared the case. Last chance is given to last argue the case on the next date, failing which the case will be decided on the available record without arguments on 22.11.2022 before D.B at camp court D.I.Khan. P.P given to the parties.



(Rozina Rehman)
Member(J)



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

26.01.2022

Tour is Cancelled, therefore, case is adjourned to 25.05.2022 for the same as before.


Reader.

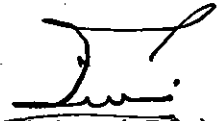
25.05.2022

Learned counsel for the appellant present. Mr. Farhaj Sikandar, District Attorney for the respondents present.

Learned counsel for the appellant sought adjournment on the ground that similar nature service appeals have been fixed on 27.07.2022, therefore, the instant appeal may also be fixed on the said date. Adjourned. To come up for arguments on 27.07.2022 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

27-07-2022

Due to Summer vacations, the case is adjourned to 28-08-2022 for the same as before.


Reader.

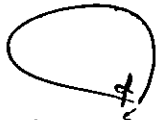
27.10.2021

Counsel for the appellant present.

Mr. Asif Masood Ali Shah, Deputy District Attorney alongwith Dr. Khalid Saeed Akbar, Divisional Litigation Officer for respondents present.

Reply on behalf of respondents submitted. Learned counsel for the appellant requested for adjournment; granted. To come up for arguments on 24.11.2021 before D.B at Camp Court, D.I. Khan.


(ATIQU-UR-REHMAN WAZIR)
MEMBER (E)
CAMP COURT, D.I KHAN


(ROZINA REHMAN)
MEMBER (J)
CAMP COURT, D.I KHAN

24.11.2021


Nemo for the appellant. Mr. Rasheed Ahmed, Deputy District Attorney alongwith Dr. Khalid Saleem, Litigation Assistant for the respondents present.

Notice for prosecution of the appeal be issued to the appellant as well as his counsel through registered post and to come up for arguments before the D.B on 26.01.2022 at Camp Court D.I.Khan.


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


Chairman
Camp Court D.I.Khan

The appeal is also accompanied by an application for suspension of the impugned notification dated 24.08.2021. Notice of the same also be issued to the respondents for the date fixed.





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

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 2424 /2021

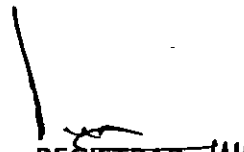
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/09/2021	<p>The appeal of Mr. Faridullah resubmitted today by Mr. Muhammad Anwar Awan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to touring S. Bench at D.I.Khan for preliminary hearing to be put up there on <u>30-09-21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
30.09.2021		<p>Mr. Muhammad Anwar Awan, Advocate, for the appellant present and sought adjournment for preliminary arguments. Adjourned. To come up for preliminary arguments before the S.B on 01.10.2021 at Camp Court D.I.Khan.</p> <p style="text-align: right;"> (SALAH-UD-DIN) MEMBER (JUDICIAL) CAMP COURT D.I.KHAN</p>

The appeal of Mr. Faridullah Head Master GHS Wanda Dost Ali D.I.Khan received today i.e. on 20.09.2021 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Annexures-C & D of the appeal are illegible which may be replaced by legible/better one.
- 2- Copy of rejection order of departmental appeal mentioned in para-4 of the memo of appeal is not attached with the appeal which may be placed on it.
- 3- Copy of postal receipt mentioned in the memo of appeal is not attached with the appeal which may be placed on it.

No. 1873 /S.T,

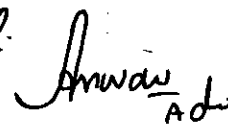
Dt. 20/09 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

M.Anwar Awan Advocate,
D.I.Khan.

Respected Sir

Annexure C & D is replaced. Copy of postal Receipt is wrongly mentioned in memo of appeal. The department has orally refused the departmental appeal.


A.A.
23/9/2021

2444/21

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title:

Farid Ullah VS Govt of KPK etc

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: <u>M. Anwar Awan ASE</u>		
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly pagged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?		No
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On	✓	
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On	✓	
26	Whether copies of comments/reply/rejoinder submitted? On	✓	
27	Whether copies of comments/reply/rejoinder provided to opposite party? On		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:

M. Anwar Awan ASE

Signature:

Dated:

03/08/2021

**BEFORE THE KP SERVICE TRIBUNAL PESHAWAR
CAMP AT DERA ISMAIL KHAN.**

Appeal no..... of 2021.

Farid Ullah


VERSUS

Govt of KPK and others

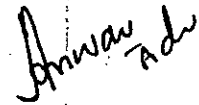
INDEX

No.	Particulars	Annexure	Pages
1	Appeal		1-4A
2	Copy of Order Dated; 20-06-2019.	A	5-11
3	Copy of Office Order Dated; 03-09-2019	B	12
4	Copy of Notification Dated; 24-08-2021.	C	13
5	Copy of Departmental Appeal & Postal Receipts.	D	14
6	Copy of Seniority List.	E	15-18
7	Wakalat Nama.	F	19

Your humble Appellant


Farid Ullah

Dated; 16-09-2021.



Mohammad Anwar Awan
Advocate Supreme Court.

- 1 -

**BEFORE THE KP SERVICE TRIBUNAL PESHAWAR
CAMP AT DERA ISMAIL KHAN.**

Appeal no..... of 2021.

Farid Ullah Head Master (BS-17) GHS Wanda Dost Ali D.I.Khan.

VERSUS

1. Government of Khyber Pakhtunkhwa through secretary Elementary and secondary Education Peshawar.
2. Director Elementary and Secondary Education Deptt: Peshawar.
3. District Education officer (male) Elementary and Secondary Education Deptt: D.I.Khan.
4. Account Officer Kachahri Road D.I.Khan.

Anwar

**APPEAL UNDER SECTION 4 OF KP SERVICE TRIBUNAL ACT
1974 AGAINST ILLEGAL AND MALAFIDE OFFICE ORDER
DATED; 24-08-2021 REGARDING E-TRANSFER/POSTING OF
TEACHING CADRE AT WRONG POSTS.**

That the brief facts of the case are as under:

1. That the Appellant is appointed as Subject Specialist Pashto (BS-17) vide notification Dated; 20-06-2019. Copy of Notification Dated; 20-06-2019 is Annexure A.
2. That the petitioner was posted as Head Master (BS-17) at Government High School Wanda Dost Ali D.I.Khan vide order Dated; 03-09-2019. The Appellant is still performing his duties as Head Master. Copy of Office Order Dated; 03-09-2019 is Annexure B.
3. That Respondent No. 1 vide notification Dated; 24-08-2021 regarding E-Transfer of Teaching Cadre posted at wrong cadres. The Appellant being Subject Specialist working as Head Master in same cadre, but respondents treating subject Specialist and Head Master at different cadres, directing the Appellant to apply for E-Posting being posted at wrong cadre. Copy of Notification Dated; 24-08-2021 is Annexure C.
4. That feeling aggrieved from notification Dated; 24-08-2021, the appellant file departmental Appeal Dated; 01-09-2021 which was refused by directing the appellant to apply for E-Posting on 14-09-2021. Copy of Departmental Appeal and postal receipts is annexure D.

- 2 -
5. That feeling aggrieved from above said office orders, petitioner is constrained to approaches this honorable court on the following amongst other:

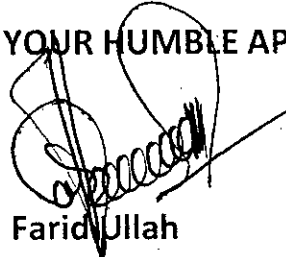
GROUND'S;

1. That the appellants are not treated in accordance with law and notification Dated; 24-08-2021 of the respondents are malafide besides being discriminatory and harsh.
2. That the Subject Specialist and Head Master have same cadre and there is seniority list prepared by the Department is one and the same. The Subject Specialist and Head Master are promoted as principal with same seniority list but through impugned notification dated; 24-08- 2021 they are treating Subject Specialist and Head Master being different cadres which is totally against the law and rules. Copy of Seniority List is Annexure E.
3. That it is also worth mentioning that trough impugn notification, the secretary Elementary and secondary Education has exempted the Principal/vice Principal and senior Subject Specialist from E- Posting which also affirm the Plea of Appellant so the Department is saying cold and hot from the same breath.
4. It is also astonishing fact that in near past the Department itself some of Subject Specialist were permanently posted against the post Head Master.

In view of the above, It is, therefore, most respectfully prayed that on acceptance this appeal this honorable court may pleased to declare that the Notification Dated ;24-08-2021 to the extent of Subject Specialist and Head Master being void, illegal, without lawful authority and of no legal

effect. It is further prayed that alternately the post of Appellant being permanently treated/Posted as Head Master as per rules.

YOUR HUMBLE APPELLANT



Farid Ullah
Through Counsel

Anwar Adv

Dated; 16-09-2021.

Mohammad Anwar Awan
Advocate Supreme Court

Certificate:-

It is certified that no appeal is pending against
impugn notification was filed before Hon'ble Tribunal.

Anwar Adv

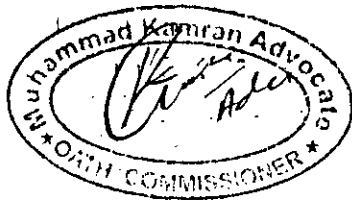
BEFORE THE KP SERVICE TRIBUNAL PESHAWAR
CAMP AT DERA ISMAIL KHAN.

Appeal no..... of 2021.

Farid Ullah **VERSUS** Govt of KPK and others

AFFIDAVIT

Farid Ullah, do hereby solemnly affirm and declare on OATH that the contents of the same are true and correct to the best of my knowledge and belief and that nothing has been concealed from this honorable court.



[Handwritten signature]

Deponent.

12/10/0896727-9

[Handwritten signature]

- 4A -

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

Farid Ullah VS Govt; of KPK and others

APPEAL

APPLICATION FOR SUSPENSION OF IMPUGN NOTIFICATION DATED; 24-08-2021.

Respectfully Sheweth,

- 1- That the appellant being Subject Specialist, is working as Head Master in High School. Through impugn notification the Department is considering Subject specialist and Head Master being different cadre which is against law and rules. On the basis of impugn notification Department is transferring/ posting Appellant on different position which will causes irreparable loss to the Appellant.
- 2- That Appellant has good prima facie case and balance of convenience also tilts in favor of Appellant.

It is therefore requested that till decision of main appeal, the impugn notification may kindly be suspended. Any other relief which this honorable court thinks fit may kindly be granted.

YOUR HUMBLE APPELLANT

Farid Ullah
Through Counsel

AFFIDAVIT;

Farid Ullah, do hereby solemnly affirm and declare on OATH that the contents of the same are true and correct to the best of my knowledge and belief and that nothing has been concealed from this honorable court.



Deponent

A-5

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
 Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
 Phone: 091-9210480, Fax # 091-9211419

Dated Peshawar the Jun 20, 2019

NOTIFICATION

NO.SO(SM)E/SS/ED/3-2/2017/Recruitment of 730 SS (Pashto): Consequent upon the recommendation of Khyber Pakhtunkhwa Public Service Commission vide letter No. 008088 dated 26.04.2019 & No.010346 dated 22.05.2019, the Competent Authority/Chief Secretary Khyber Pakhtunkhwa is pleased to appoint the following Eighty two (82) candidates as Subject Specialist Pashto (BS-17) (@Rs.30370-2300-76370) plus usual allowances as admissible under the rules, on regular basis under the existing policy of the Provincial Government.

2. Consequent upon their appointment as Subject Specialist Pashto (BS-17), they are posted on positions and stations as noted against each:

Sr#	Name with Father's Name	Domicile/Zone	Posted as	Remarks
1.	Mr. Sajid Ali S/O Bakhtiar Ahmad	Malakand/3	SS Pashto (BS-17) GHSS Gojaro Garhi Mardan	Against Vacant Post
2.	Mr. Ibad Ur Rehman S/O Abd Us Samad	Dir Lower/3	SS Pashto (BS-17) GHSS Serai Bala Dir Lower	-do-
3.	Mr. Miraj Muhammad S/O Mandali Badshah	Karak/4	SS Pashto (BS-17) GHSS Nari Panos Karak	-do-
4.	Mr. Zawair Khan S/O Yaqoot Khan	Manshira/5	SS Pashto (BS-17) GHSS Jareed Manshira	-do-
5.	Mr. Shoaib Khan S/O Jaffar Shah	Nowshera/2	SS Pashto (BS-17) GHSS Dagai Nowshera	-do-
6.	Mr. Hazrat Khan S/O Sher Muhammad	Kurram/1	SS Pashto (BS-17) GHSS Nizampur Nowshera	-do-
7.	Mr. Faisal Rehman S/O Saleh Shah	Swabi/2	SS Pashto (BS-17) GHSS Kunda Swabi	-do-
8.	Mr. Muhammad Afzal S/O Muhib Ullah	Malakand/3	SS Pashto (BS-17) GHSS Chamtalai Swat	-do-
9.	Mr. Rafi Ullah S/O Muhammad Shakoore	Dir Upper/3	SS Pashto (BS-17) GHSS Barawal Bandi Dir Upper	-do-
10.	Mr. Muhammad Khalil S/O Mastan Gul	Orakzai/1	SS Pashto (BS-17) GHSS Muslim Abad Kohat	-do-

Page 1 of 7

M. Awan
M. Awan Awan
 Advocate Supreme Court
 D.I.Khan



GOVERNMENT OF KHYBER PAKHTUNKHWA
 ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
 Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
 Phone: 091-9210480, Fax # 091-9211419

11.	Mr. Mubarak Zaib Khan S/O Gul Nawaz Khan	Dir Upper/3	SS Pashto (BS-17) GHSS Neguh Dir Upper	-do-
12.	Mr. Haleyaz Khan S/O Mir Atlas Khan	Dannu/4	SS Pashto (BS-17) GHSS Lalozai Dannu	-do-
13.	Mr. Zeenat Ullah S/O Biyamin Khan	N.Waziristan/1	SS Pashto (BS-17) GHSS No.3 Lakki Marwat	-do-
14.	Mr. Syed Mumtaz Ali Shah S/O Syed Mardan Shah	Swabi/2	SS Pashto (BS-17) GHSS Ismaila Swabi	-do-
15.	Mr. Ashraf Ali S/O Fazli Diyar	Mardan/2	SS Pashto (BS-17) GHSS Baghicha Dheri Mardan	-do-
16.	Mr. Islam Wadoad S/O Mian Sherin	Malakand/3	SS Pashto (BS-17) GHSS Tawda China Dir Lower	-do-
17.	Mr. Inayat Ullah S/O Adal Zamir	Karak/4	SS Pashto (BS-17) GHSS Togh Bala Kohat	-do-
18.	Mr. Muhammad Abbas S/O Gul Zamir	Gi. Swabi/3	SS Pashto (BS-17) GHSS Naro Banda Swabi	-do-
19.	Mr. Sudheer Khan S/O Shah Banat Khan	Mansehra/5	SS Pashto (BS-17) GHSS Bandi Shungli Mansehra	-do-
20.	Mr. Shams Ur Rehman S/O Ghuncha Gull	Kurrum/1	SS Pashto (BS-17) GHSS Dallah Hangu	-do-
21.	Mr. Zubair Muhammad S/O Sher Rehman	Mardan/2	SS Pashto (BS-17) GHSS Pir Abad Mardan	-do-
22.	Mr. Ibrahim S/O Sarfaraz Khan	Swat/3	SS Pashto (BS-17) GHSS Kishwara Swat	-do-
23.	Mr. Habib Ullah S/O Barakat Khan	Dir Upper/3	SS Pashto (BS-17) GHSS Landi Kachi Kohat	-do-
24.	Mr. Qaisar Khan S/O Rahim Shah	Karak/4	SS Pashto (BS-17) GHSS Gumbat Kohat	-do-
25.	Mr. Anis Ur Rehman S/O Rahim Habib Ur Rehman	Mansehra/5	SS Pashto (BS-17) GHSS Dhodial Mansehra	-do-
26.	Mr. Sami Ullah S/O Niaz Badcen	Khyber/1	SS Pashto (BS-17) GHSS Zahir, Abad Peshawar	-do-

M. Atiqur Awan
 M. Atiqur Awan
 Advocate Supreme Court
 D.I. Khan



GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block "A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone: 091-9210480, Fax # 091-9211419

27.	Mr. Mehmood S/O Sher Ali Khan	Malakand/3	SS Pashto (BS-17) GHSS Ikram Pur Mardan	-do-
28.	Mr. Abdur Rahim Khan S/O Rasool Khan	Swabi/2	SS Pashto (BS-17) GHSS Ayub Khan Killi Swabi	-do-
29.	Mr. Noor Ul Wahab S/O Fazli Wahab	Khyber/1	SS Pashto (BS-17) GHSS Cantt No.1 Peshawar	-do-
30.	Mr. Fayaz Ali S/O Amir Khan	Mardan/2	SS Pashto (BS-17) GHSS Dheri Likipani Mardan	-do-
31.	Mr. Muhammad Naqeeb S/O Wali Muhammad	Malakand/3	SS Pashto (BS-17) GHSS Ochi Dir Lower	-do-
32.	Mr. Muzaffar Khan S/O Samandar Khan	Battagram/3	SS Pashto (BS-17) GHSS Kuza Banda Battagram	-do-
33.	Mr. Inam Ullah Khan S/O Bahader Nawaz Khan	Bannu/4	SS Pashto (BS-17) GHSS Hakim Haved Bannu	-do-
34.	Mr. Muhammad Khalid S/O Khushal Khan	Manshra/5	SS Pashto (BS-17) GHSS Karori Manshra	-do-
35.	Mr. Musvid Khan S/O Sham Shad Khan	Khyber/1	SS Pashto (BS-17) GHSS Hayatabad Peshawar	-do-
36.	Mr. Rahim Nawab Mian S/O Chaman Z.B Mian	Swat/3	SS Pashto (BS-17) GHSS Khwazakhela Swat	-do-
37.	Mr. Tariq Gul S/O Rahim Din	Charsadda/2	SS Pashto (BS-17) GHSS Tarnab Charsadda	-do-
38.	Mr. Shahri Yar S/O Fateh Sher	Dir Upper/3	SS Pashto (BS-17) GHSS Ganori Dir Upper	-do-
39.	Mr. Tahir Muhammad S/O Nek Muhammad	Karak/4	SS Pashto (BS-17) GHSS Shah Salim Karak	-do-
40.	Mr. Amjad Ali S/O Saif Ur Rehman	Charsadda/2	SS Pashto (BS-17) GHSS Bang Chitral	-do-
41.	Mr. Junaid Khan S/O Gul Sharif	Manshra/5	SS Pashto (BS-17) GHSS No.1 Manshra	-do-
42.	Mr. Fazal Habib S/O Muhammad Zarin	Bajaur/1	SS Pashto (BS-17) GHSS Gardal Bajaur	V.S#83

M. Amir Awan
Advocate Supreme Court
D.I. Khan



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone: 091-9210480, Fax # 091-9211419

43.	Mr. Rizwan Ullah S/O Muhammad Dost	Dir Lower/3	SS Pashto (BS-17) GHSS Lal Qila Dir Lower	A.V.P
44.	Mr. Farid Ullah S/O Abdur Rahim	D.I. Khan/4	SS Pashto (BS-17) GHSS Dara Paizu Lakk Marwat	-do-
45.	Mr. Hakeem Ullah S/O Abdullah Khan	Manshra/5	SS Pashto (BS-17) GHSS Behali Manshra	-do-
46.	Mr. Shahab Akbar S/O Akbar Shah	Charsadda/2	SS Pashto (BS-17) GHSS Umarzai Charsadda	-do-
47.	Mr. Yaser Ullah S/O Ihsan Ullah	Mohmand/1	SS Pashto (BS-17) GHSS Haryana Peshawar	-do-
48.	Mr. Aamir Hayat S/O Faridoon Khan	Dir Lower/3	SS Pashto (BS-17) GHSS Khairabad Dir Lower	-do-
49.	Mr. Riaz Khan S/O Fazal Wadooz	Peshawar/2	SS Pashto (BS-17) GHSS Sheikhan Peshawar	-do-
50.	Mr. Rehman Gul S/O Juma Gul	FR Lakk/1	SS Pashto (BS-17) GHSS Daraka Aziz Khan Lakk Marwat	-do-
51.	Mr. Arshad Ali S/O Usman Ghani	Swabi/2	SS Pashto (BS-17) GHSS Jabbi Nowshera	-do-
52.	Mr. Kamil Khan S/O Awal Khan	Buner/3	SS Pashto (BS-17) GHSS Batara Buner	-do-
53.	Mr. Muhammad Altaf S/O Ghulam Shah	Tank/4	SS Pashto (BS-17) GHSS Gomul Bazar Tank	-do-
54.	Mr. Attaur Rehman S/O Balkay	Manshra/5	SS Pashto (BS-17) GHSS Doga Manshra	-do-
55.	Mr. Alam Zeb S/O Jehanzeb	Khyber/1	SS Pashto (BS-17) GHSS Umar Payan Peshawar	-do-
56.	Mr. Musafar Gul S/O Mehar Gul	Peshawar/2	SS Pashto (BS-17) GHSS City No.1 Peshawar	-do-
57.	Mr. Noor Ur Rehman S/O Ghani Ur Rehman	Mardan/2	SS Pashto (BS-17) GHSS Bakhshali Mardan	-do-
58.	Mr. Sabir Ur Rehman S/O Daood Ur Rehman	Bannu/4	SS Pashto (BS-17) GHSS	-do-

Page 4 of 7

M. AZHAR AWAN
Advocate Supreme Court
D.I. Khan

(MAFEEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS MALE)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone: 091-9210180; Fax # 091-9211419

			Comprehensive Bannu	
59.	Mr. Ibrahim S/O Muhammad Sahib	Swat/3	SS Pashto (BS-17) GHSS Fatchipur Swat	-do-
60.	Mr. Naseer Ahmad S/O Dilayar Khan	Manshra/5	SS Pashto (BS-17) GHSS Gali Baidrat Manshra	-do-
61.	Mr. Farman S/O Lal Jan	Mohmand/1	SS Pashto (BS-17) GHSS Rashakai Nowshera	-do-
62.	Mr. Sahib Ullah S/O Adam Khail	Peshawar/2	SS Pashto (BS-17) GHSS Sufaid Sang Peshawar	-do-
63.	Mr. Saeed Ahmad S/O Said Halim	Dir Lower/3	SS Pashto (BS-17) GHSS Khal Colony Dir Lower	-do-
64.	Mr. Bahramand Khan S/O Diyar Khan	Buner/3	SS Pashto (BS-17) GHSS Gagra Buner	-do-
65.	Mr. Asmat Ullah Khan S/O Miran-Shah	Lakki Marwat/4	SS Pashto (BS-17) GHSS Abdul Khel Lakki Marwat	-do-
66.	Mr. Aqcel Ur Rehman S/O Fazal Ur Rehman	Manshra/5	SS Pashto (BS-17) GHSS Oghi Manshra	-do-
67.	Mr. Maaz Ullah S/O Abdul Ghani	Peshawar/2	SS Pashto (BS-17) GHSS Musazai Peshawar	-do-
68.	Mr. Khurshid Alam Khan S/O Muhammad Sadiq Khan	FR Bannu/1	SS Pashto (BS-17) GHSS Cantt No.3 Peshawar	-do-
69.	Mr. Ali Rehman S/O Syed Ahmad Khan	Peshawar/2	SS Pashto (BS-17) GHSS Pakha Ghulam Peshawar	-do-
70.	Mr. Syed Luqman Shah S/O Syed Mohalim Shah	UDA Manshra/3	SS Pashto (BS-17) GHSS Thakra Manshra	-do-
71.	Mr. Amin Ullah S/O Biradar	Dir Upper/3	SS Pashto (BS-17) GHSS Akhagram Dir Upper	-do-
72.	Mr. Yar Zaman Khan S/O Ghulam Rasool Khan	Dajaur/1	SS Pashto (BS-17) GHSS Munda Dir Lower	-do-
73.	Mr. Nigah Hussain S/O Umar Gul	Peshawar/2	SS Pashto (BS-17) GHSS Cantt No.2 Peshawar	-do-

Page 5 of 7

M. Anwar Awan
M. Anwar Awan
Advocate Supreme Court
D.I. Khan

SECTION OFFICER (SCHOOLS MALE)



GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone: 091-9210480, Fax # 091-9211419

74.	Mr. Muhammad Arshad S/O Alam Zeb	Malakand/3	SS Pashto (BS-17) GHSS Shergarh Mardan	-do-
75.	Mr. Muhammad Waqar Ali S/O Israr Ali	Charsadda/2	SS Pashto (BS-17) GHSS Hassanzai Charsadda	-do-
76.	Mr. Safdar Abbas S/O Himayat Ali	Kohat/4	SS Pashto (BS-17) GHSS Gagra Buner	-do-
77.	Mr. Jamal Noor S/O Meharban Khan	FR Tank/1	SS Pashto (BS-17) GHSS Mullazai Tank	-do-
78.	Mr. Abdurrahman S/O Ghulam Jelani	Swabi/2	SS Pashto (BS-17) GHSS Narangi Swabi	-do-
79.	Mr. Altaf Hussain S/O Shahi Mulk	Malakand/3	SS Pashto (BS-17) GHSS Asbanr Dir Lower	-do-
80.	Mr. Haq Nawaz Khan S/O Ghani Khan	Karak/4	SS Pashto (BS-17) GHSS Jandrai Karak	-do-
81.	Mr. Muhammad Amin S/O Halawat Shah	G. Swabi/3	SS Pashto (BS-17) GHSS Chanai Swabi	-do-
82.	Mr. Muhammad Zeb S/O Hamesh Gul	Swabi/2	SS Pashto (BS-17) GHSS Tarakai Swabi	-do-
Adjustment				
83.	Mr. Fazli Wahab, SS H/Civics (BS-17) Working as SS Pashto (BS-17) GHSS Gardai Bajaur		SS H/Civics (BS-17) GHSS Mian Killi Dir Lower	V.S#84
84.	Mr. Muhammad Yousaf, SS Islamiat (BS-17) working as SS H/Civics (BS-17) GHSS Mian Killi Dir Lower		SS Islamiat (BS-17) GHSS Rabat Dir Lower	A.V.P

Terms and Conditions:

1. They shall be governed by the Khyber Pakhtunkhwa Civil Servants Act, 1973 and the rules made thereunder.
2. Their pay shall be released subject to verification of their academic documents/testimonials from the concerned Board/University by the District Education Officer (Male) concerned.
3. Their services shall be considered regular and they shall be eligible for pension/deduction of GP Fund in terms of the Khyber Pakhtunkhwa Civil Servants Act, 1973 as amended in 2013.

Page 6 of 7

M. Anwar Awan
M. Anwar Awan
Advocate Supreme Court
D.I.Khan

(MAFEEZ-UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS MALE)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone: 091-9210480, Fax # 091-9211419

4. Their services are liable to termination on one month notice from either side. In case of resignation without notice, their one month's pay/allowances shall be forfeited to the Government.
5. They shall be on probation for initial period of one year extendable for further one year as per rules.
6. They shall be governed by such rules & regulations as may be issued from time to time by the Government.
7. Their services can be terminated at any time, in case their performance was found unsatisfactory during probationary period.
8. The appointees shall join their posts within 30 days of the issuance of this notification and the Director E&SE Khyber Pakhtunkhwa Peshawar shall furnish a certificate to the effect that the candidates have joined their posts, failing which their candidature shall expire automatically and no subsequent appeal etc shall be entertained.
9. Charge assumption report should be submitted to all concerned.
10. No TA/DA shall be allowed to the appointees for joining their duties.

SECRETARY

Endst: of even No. & Date :-

Copy forwarded to the:

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar, along-with application forms of the above Subject Specialists.
3. Director (Recruitment) Khyber Pakhtunkhwa Public Service Commission Peshawar.
4. District Education Officers (Male) Concerned.
5. District Accounts Officers Concerned.
6. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
7. PS to Advisor to CM for E&SE Department, Khyber Pakhtunkhwa.
8. Director EMIS, E&SE Department for uploading at the official website.
9. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
10. Subject Specialists concerned.
11. Office order file.

Mohammad Shoaib
(MOHAMMAD SHO AIB)
SECTION OFFICER (SCHOOLS MALE)

M. Anwar Awan
M. Anwar Awan
Advocate Supreme Court
D.I.Khan

Page 7 of 7

11. Office order file

Hafeez ur Rehman Shah
(HA FEEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS MALE)

B-12



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the September 03, 2019

CORRIGENDUM

NO.SD/SME&SEDA-2/2017/Recruitment of 230 SS (Pashto): In partial modification of this Department notification of even number dated 20.06.2019, the place of posting in respect of Mr. Farid Ullah, Subject Specialist Pashto (BS-17) GHSS Dara Pezu Lakki Marwat, may be read as HM (BS-17) GHSS Wanda Dost Ali D.I. Khan, against the vacant post.

2. No TA/DA is allowed.

Endst: of even No. & Date

SECRETARY

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Male), Lakki Marwat, D.I. Khan.
4. District Accounts Officers, Lakki Marwat, D.I. Khan.
5. PS to Advisor to CM for E&SE Department, Khyber Pakhtunkhwa
6. PS to Secretary E&SE Department.
7. Director, FMIS E&SE Department.
8. Subject Specialist concerned
9. Master file.

(SHAHID RAFIQ)
SECTION OFFICER (SCHOOLS MALE)

Anwar
M. Anwar Awan
Advocate Supreme Court
D.I.Khan

(MAFEEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS MALE)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
(Phone No. 091-922211)

Dated Peshawar the August 24, 2021

OFFICE ORDER

No.SO(SM) E&SED/7-1/2020/PT/E-Transfer: The Competent Authority has been pleased to decide and direct that all postings made against cross/wrong cadre posts in teaching cadre be transferred and posted against their original posts.

2. For the purpose this Department is activating e-transfer portal w.e.f 06-09-2021 to 15-09-2021 to provide an option to all teaching staff (BPS-12 to 18) excluding Subject Specialist (BS-18) and Vice Principal/Principal (BS-18) posted against wrong posts to submit applications on available vacant posts of their own cadre posts as per criteria of the online e-transfer portal.

3. It has been further decided by the competent authority that all those who do not apply or get their posting corrected shall be transferred through an automated system based on "posting non applying persons on the farthest available post."

4. The following should be considered as wrong/cross cadre posting:-

- i. Subject Specialists (BS-17 & 18) posted against other Cadres/Subjects.
- ii. Headmaster (HM)/Instructor Physical Education (IPE)/Librarian posted against Subject Specialist (SS) or any other wrong post and vice versa.
- iii. SST posted against SCT, SDM, SAT, STT and SPET or any other wrong post and vice versa.
- iv. SST (Science/IT) posted against SST (G) or any other wrong post and vice versa.
- v. SST(M/P) posted against SST (B/C), (IT) or any other wrong post and vice versa.
- vi. SCT posted against SDM, SAT, SPET, STT or any other wrong post and vice versa.
- vii. CT posted against AT, DM, TT, PET or any other wrong post and vice versa.
- viii. PST (BS-12) posted against PSHT or any other wrong post and vice versa.

Note:- The following is excluded from the ongoing e-transfer and will be considered in next phases:-

"District cadres teaching staff (BS-15 and below) posted in other districts than his district of appointment."

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Encl: Even No. & Date:

Copy of the above is forwarded to the:

1. The Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. The Director, Curriculum and Teacher Education, Khyber Pakhtunkhwa Abbottabad.
3. The Director, Directorate of Professional Development, Peshawar.
4. PSO to Chief Secretary, Khyber Pakhtunkhwa.
5. Director, EMIS, E&SE Department for uploading at official website.
6. All District Education Officers (Male/Female), Khyber Pakhtunkhwa.
7. All Section Officers, E&SE Department Khyber Pakhtunkhwa, Peshawar.
8. PS to Secretary E&SE Department.
9. PS to Special Secretary E&SE Department.
10. PA to Additional Secretary (Estab) E&SE Department.
11. Office order file.


(HAFAEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS MALE)

- C - 13



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 991-22111

Dated Peshawar the August 24, 2021

OFFICE ORDER

No. SO(SM) E&SED/7-1/2020/PT/E-Transfer. The Competent Authority has been pleased to decide and direct that all postings made against cross/wrong cadre posts in teaching cadre be transferred and posted against their original posts.

2. For the purpose this Department is activating e-transfer portal w.e.f 06-09-2021 to 15-09-2021 to provide an option to all teaching staff (BPS-12 to 18) excluding Subject Specialist (BS-15) and Vice Principal/Principal (BS-18) posted against wrong posts to submit applications on available vacant posts of their own cadre posts as per criteria of the online e-transfer portal.

3. It has been further decided by the competent authority that all those who do not apply or get their posting corrected shall be transferred through an automated system based on "posting non applying persons on the farthest available post."

4. The following should be considered as wrong/cross cadre posting:-

- i. Subject Specialists (BS-17 & 18) posted against other Cadres/Subjects.
- ii. Headmaster (HM)/Instructor Physical Education (IPE)/Librarian posted against Subject Specialist (SS) or any other wrong post and vice versa.
- iii. SST posted against SCT, SDM, SAT, STT and SPET or any other wrong post and vice versa.
- iv. SST (Science/IT) posted against SST (C) or any other wrong post and vice versa.
- v. SST(M/P) posted against SST (B/C), (IT) or any other wrong post and vice versa.
- vi. SCT posted against SDM, SAT, SPET, STT or any other wrong post and vice versa.
- vii. CT posted against AT, DM, TT, PET or any other wrong post and vice versa.
- viii. PST (BS-12) posted against PSHT or any other wrong post and vice versa.

Note:- The following is excluded from the ongoing e-transfer and will be considered in next phases:-

"District cadres teaching staff (BS-15 and below) posted in other districts than his district of appointment."

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Ends: Even No. & Date:

- Copy of the above is forwarded to the:
1. The Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
 2. The Director, Curriculum and Teacher Education, Khyber Pakhtunkhwa Abbottabad.
 3. The Director, Directorate of Professional Development, Peshawar.
 4. PSO to Chief Secretary, Khyber Pakhtunkhwa.
 5. Director, EMIS, E&SE Department for uploading at official website.
 6. All District Education Officers (Male/Female), Khyber Pakhtunkhwa.
 7. All Section Officers, E&SE Department Khyber Pakhtunkhwa, Peshawar.
 8. PS to Secretary E&SE Department.
 9. PS to Special Secretary E&SE Department.
 10. PA to Additional Secretary (E&SE) E&SE Department.
 11. Office order file.

24/8/2021
MAFEEZ UR REHMAN SHAH
SECTION OFFICER (SCHOOLS MALE)

M. ANWAR AWAZI
Additional Secretary
D. Khan

D - 14 -

The Chief Minister
Khyber Pakhtunkhwa
Peshawar

Through: Proper Channel

Subject: DEPARTMENTAL APPEAL AGAINST OFFICE ORDER DATED: 24-08-2021

Respected Sir,

The Appellant Humbly Submits as under:

1. That the appellant being Subject specialist (Pashto) BS-17 working Head Master at Government High School Wanda Host Ab D.I. Khan since 04-09-2019.
2. That secretary to Government of Khyber Pakhtunkhwa Education & Secondary education department Peshawar has issued office order dated 24-08-2021 regarding E-Transfer of teaching cadre posting at wrong cadre. The subject specialist and Head Master have same cadre and their seniority list prepared by the department is same. It is also worth mentioning that subject specialist and Head Master are promoted with same seniority list to the post of Principal. Now the department in the light of order dated 24-08-2021 disturb posting the appellant against any other post treating the appellant posted at wrong cadre which is totally illegal. The appellant being subject specialist is working as Head Master in the same cadre, so could not be affected on the basis of office order dated 24-08-2021. It is also astonishing fact that due to this wrong implementation most of post of Head Master posts would become vacant due to non-availability of Head Masters. It is also worth mentioning that secretary Elementary and secondary Education has exempted the principal / Vice-Principal and Senior Subject Specialist from E-posting which also affirm the plea of Appellant that Principal and Senior Subject Specialist are one and the same cadre so the department is saying cold and hot from same breath.

It is, therefore, requested that may kindly accept the appeal plaintiff the appellant and the posting of appellant may not be disturbed due to office order dated: 24-08-2021.

M. Anwar Aman
Advocate Supreme Court
D.I. Khan

Your Honorable Appellant
Farid Ullah
SS Pashto
Head Master GHS Wanda Host Ab
D.I. Khan

-51-3

TENTATIVE SENIORITY LIST OF SUBJECT SPECIALISTS HEAD MASTER MALE (B-17) OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA PESHAWAR AS STOOD ON 31-12-2020.

M. A. KHAN
Acting Director
D. Education

S.#	Name of Officers with Qualification	D.O Birth	Domicile	Date of 1st Entry in Edu	Regular appointment/promotion to			Designation/Place of Posting	Remarks
					Reg. Date	Grade	Method of Recruitment		
1	AMJAD ALI MA.B.ED	10.02.1972	MARDAN	26.05.1999	24.5.2018	17	BY promotion	SS English GHSS Monebat Abad Mardan	SO(S) E&SE/2-1/2018/promotion BS-16 to BS-17
2	Aadlat Khan S/o Amir Nawab SS Economics	20.04.1976	Mardan	12.01.2010	12.01.2010	17	D/Selectee	SS GHSS NO.1 Mardan	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
3	Inam Ullah S/o Saif ur Rahman SS Pak Study	28.04.1981	Dir	11.09.2008	12.01.2010	17	D/Selectee	SS GHSS Barawal Bandi Dir(U)	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
4	Muhammad Kashif Khan S/o Muhammad Hayat SS Pak Study	12.09.1982	Mohmand Agency	12.01.2010	12.01.2010	17	D/Selectee	GHSS Pandi Lalma Khyber	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
5	Hashmat Ullah Khan S/o Rasool Bahadar SS Economics	05.02.1983	FR Bannu	01.02.2010	12.01.2010	17	D/Selectee	GHSS Kotka Muhammad Khan Bannu	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
6	Saeed Ahmad S/o Ghulam Sarwar SS Pak Study	25.02.1983	NWA	02.02.2010	12.01.2010	17	D/Selectee	SS GCET Mir Ali NWA	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
7	Taqi Ali S/o Noor Sarwar SS Economics	16.05.1983	Orakzai Agency	12.01.2010	12.01.2010	17	D/Selectee	GHSS Kahya Orakzai	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
8	Shah Ullah Khan S/o Hakim Khan SS Pak Study	16.01.1984	Kohat	03.03.1982	12.01.2010	17	D/Selectee	GHSS Mandori Kohat	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
9	Ibad Ullah S/o Qazi Ziaullah SS Pak Study	22.03.1967	Mansehra	01.04.1986	10.01.2011	17	D/Selectee	GHS Koleka Mansehra	SO(S) E&SE/3-2/2011/Various subject dated 10.01.2011(Merit 01/2009)
10	Azam Jan S/o Jamazan SS Pak Study	01.01.1969	SWA	17.10.1989	12.01.2010	17	D/Selectee	GHSS Gagra Hanpur	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
11	Muhammad Zubair Khan S/o Ahmad Shah SS Pak Study	02.04.1969	Karak	16.05.1992	12.01.2010	17	D/Selectee	GHSS Tappi Kanda Karak	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
12	Zafar Iqbal S/o Noor Muhammad SS Pak Study	13.06.1970	Haripur	01.07.1997	12.01.2010	17	D/Selectee	GHSS Beer, Haripur	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
13	Ahsan Ullah S/o Ana Ullah SS Pak Study	03.03.1972	Chitral	01.04.1992	12.01.2010	17	D/Selectee	GHSS Ayn Chitral	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
14	Shahir Muhammad S/o Mustafa SS Pak Study	10.06.1975	Battagram	28.08.1995	10.01.2011	17	D/Selectee	working as SDEO (F) Judoa Tor Ghar	SO(S) E&SE/3-2/2011/Various subject dated 10.01.2011(Merit 01/2009)
15	Shah Hassan S/o Shah Hussain SS Pak Study	10.06.1976	Mardan	21.7.2003	12.01.2010	17	D/Selectee	SS GHSS Sher Garh Mardan	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
16	Asif Ali S/o Muhammad Afzar SS Pak Study	02.09.1976	Swabi	12.01.2010	12.01.2010	17	D/Selectee	SS GHSS Doblan Swabi	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
17	Shahid Ur Rahman S/o Abdul Ahad SS Economics	12.12.1974	Chitral	10.04.1999	12.01.2010	17	D/Selectee	GHSS Baram Owk Chitral	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
18	Amir Zeeshan S/o Jamshaid Khan SS Economics	01.01.1977	Swat	12.01.2010	12.01.2010	17	D/Selectee	GHSS Batai Khazakhela Swat	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
19	Zameer Khan S/o Lal Saif SS Economics	10.03.1977	Malakand	12.01.2010	12.01.2010	17	D/Selectee	GHSS Malakand	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
20	Taqi Ahmad S/o Ahmad Sher SS Economics	01.01.1980	Shangla	02.12.2008	10.01.2011	17	D/Selectee	GHSS Sandovi, Shangla	SO(S) E&SE/3-2/2011/Various subject dated 10.01.2011(Merit 01/2009)
21	Mian Ejaz Mustafa S/o Qazi Syed Mukhtar Ullah SS Economics	29.01.1973	Mansehra	29.12.1994	12.01.2010	17	D/Selectee	GHSS Batta Mansehra	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
22	Tayab Nawaz MA M.Ed SS Islamiyat	14.08.1981	Peshawar	10/10/2007	5/3/2010	17	By Regulariza	GHSS Musazai	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
23	Mikhar Ahmad MA M.Ed SS Maths	01.05.1983	Lakki Marwat	14/07/2007	5/3/2010	17	By Regulariza	GHSS Smanbaz Khel	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
24	Munammad Rafig MA M.Ed SS Islamiyat	01.04.1979	D.I.Khan	02/01/2007	5/3/2010	17	By Regulariza	GHSS Kech, D.I.Khan	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
25	Sher Banagar Khan V.Sc./M.EdSS Chemistry	02.02.1981	Dir Lower	24/12/2008	5/3/2010	17	By Regulariza	GHSS Serai Bata, Dir Lower	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
26	Iqbal Ahmad MA V.Ed SS Maths	13.04.1992	Swat	26/12/2008	5/3/2010	17	By Regulariza	GHSS Vadin Swat	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
27	Muhammad Zahir M.Sc./M.EdSS Chemistry	01.10.1974	Kohat	14/04/2007	5/3/2010	17	By Regulariza	GHSS Landi Kachi Kohat	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
28	Issa Khan M.Sc./M.EdSS Chemistry	25.05.1977	Mohmand Agency	01/09/2005	5/3/2010	17	By Regulariza	GHS Mandani Charsadda	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
29	Ana Ullah MA M.Ed SS English	02.01.1979	Chitral	28/04/2007	5/3/2010	17	By Regulariza	GHSS Drosh Chitral	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
30	Mikhar Ahmad MA M.Ed SS Stats	12.03.1979	Charsadda	02/10/2007	5/3/2010	17	By Regulariza	GHSS Tamab Fann Peshawar	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
31	Fazal Raabi MA M.Ed SS Islamiyat	20.09.1979	Swat	14/04/2007	5/3/2010	17	By Regulariza	GHSS Bataora Swat	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
32	Ashfaq Ali M.Sc./M.EdSS Biology	10.04.1980	Swabi	14/11/2005	5/3/2010	17	By Regulariza	GHSS Manen Payan Swabi	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
33	Qazi Saif Rashid MA M.Ed SS Islamiyat	01.03.1981	Haripur	24/09/2005	5/3/2010	17	By Regulariza	GHSS Panlan Hanpur	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
34	Hassan Ferooh MA M.Phil B.Ed SS Islamiyat	01.04.1981	Buner	14/04/2007	5/3/2010	17	By Regulariza	GHSS Agari Buner	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
35	Alamzeb S/O Amir Shah MA M.Ed SS Maths	20.02.1983	Baloch Agency	24/09/2009	5/3/2010	17	By Regulariza	GHSS Mian Kalay Dir Lower	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
36	Muhammad Riaz M.Sc. M.Ed SS Stats	20.03.1984	D.I.Khan	28/12/2008	5/3/2010	17	By Regulariza	GHSS Mandran Kalan, D.I.Khan	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
37	Abdur Rashid SS English	01.12.1973	Lakki	24/09/2008	5/3/2010	17	By Regulariza	GHSS No.3 Lakki Marwat	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
38	Hao Nawaz SS (Eng)	10.04.1979	Shangla	24/09/2008	5/3/2010	17	By Regulariza	GHSS Sundown Shangla	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
39	Muhammad Zahir Shah M.Sc./B.EdSS Chemistry	20.11.1979	Charsadda	14/04/2007	5/3/2010	17	By Regulariza	GHSS Yancani Charsadda	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
40	Gul Dayub Khan MA/M.EdSS History cum Civics	06.09.1971	NWA	10/09/2005	5/3/2010	17	By Regulariza	GHSS Tamaso Farm Peshawar	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
41	Haziq ur Rehman MA V.Ed SS Stats	15.03.1975	Karak	04/10/2007	5/3/2010	17	By Regulariza	GHSS Snelan Peshawar	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
42	Ahmad Ghazi ud Din M.Sc./M.EdSS Biology	25.03.1978	Chitral	14/04/2007	5/3/2010	17	By Regulariza	GHSS Garim Cheshama Chitral	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
43	Siraj Khan MA M.Ed SS Islamiyat	01.02.1950	Peshawar	10/09/2005	5/3/2010	17	By Regulariza	GHSS Hayatabad Peshawar	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
44	Wahid Jan M.Sc./M.EdSS Biology	01.03.1950	Dir Lower	24/04/2007	5/3/2010	17	By Regulariza	GHSS Hayatserai, Dir Lower	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010

ISA

S.#	Name of Officers with Qualification	D.O Birth	Domicile	Date of 1st: Entry in Edu	Regular appointment/promotion to			Designation/Place of Posting	Remarks
					Reg. Date	Grade	Method of Recruitment		
364	Nasib Khan S/o Daray Khan SS Statistics	03.09.1977	Lakki Marwat	17.08.2010	16.08.2010	17	D/Selectee	GHSS Garhi Sher Dad Pesahwar	SO(S)3-2/2004/(Male) dated 16.08.2010(Merit 01/2009)
365	Muhtamim Shah S/o Sharif Khan SS English	21.02.1978	Mardan	24.02.2011	24.02.2011	17	D/Selectee	GHSS Bakhshali Mardan	SO(S/M) E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
366	Gohar Zaman S/o Rafi Uz Zaman SS Statistics	06.03.1978	D.I.Khan	16.09.2010	16.09.2010	17	D/Selectee	GHSS Khorai Di Khan	SO(S)3-2/2004/(Male) dated 16.08.2010(Merit 01/2009)
367	Wali Dad Khan S/o Zardad Khan SS Statistics	11.09.1978	Khyber Agency	17.08.2010	16.08.2010	17	D/Selectee	GHSS Musazai	SO(S)3-2/2004/(Male) dated 16.08.2010(Merit 01/2009)
368	Icbal Sher S/o Muhammad Ghafoor Khan SS English	02.11.1981	Swat	24.02.2011	24.02.2011	17	D/Selectee	GHSS Chamtalai Swat	SO(S/M) E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
369	Amir Hamza S/o Hazrat Usman Mian SS English	20.01.1982	Swat	24.02.2011	24.02.2011	17	D/Selectee	GHSS Khwaza Khela Swat	SO(S/M) E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
370	Muhammad Rizwan S/o Muhammad Sidique SS English	05.04.1982	Haripur	24.02.2011	24.02.2011	17	D/Selectee	GCMHSS No.1 Haripur	SO(S/M) E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
371	Mehmood ur Rahman s/o Hafiz Muhammad Idrees SS Biology	12.02.1972	Haripur	16.08.2010	16.08.2010	17	D/Selectee	GHSS Harmo Abbottabad	SO(S)3-2/2004/(Male) dated 16.08.2010(Merit 01/2009)
372	Saif Ur Rahman S/o Muhammad Ashraf SS Chemistry	11.01.1978	Abbottabad	01.11.2005	24.02.2011	17	D/Selectee	GHSS Sarai Saleh Haripur	SO(S/M) E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
373	Muhammad Ilyas S/o Muhammad Akram SS English	20.04.1979	Mohmand Agency	24.02.2011	24.02.2011	17	D/Selectee	GHSS Mazdor Abad Takhtbai	SO(S/M) E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
374	Shamshad Khan S/o Fateh Rahim SS Physics	25.01.1980	Mardan	25.02.2011	25.02.2011	17	D/Selectee	GHSS Sharki Hoti Mardan	SO(S/M) E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
375	Saleh Shah MA BEd	03.02.1961	Khyber Agency	05/03/1979	20/01/2010	17	By Promotion	HM/AD Training NMD FATA Peshawar	SO(PE)2-6/E&SE/DPC Meeting/09: dated 20.01.2010
376	Habib ur Rehman BSc BEd	01.02.1952	FR Bannu	15/02/1984	27/03/2010	17	By Promotion	HM GHS Sargarah M.Khan FR Lakki Marwat	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
377	Aziz Ullah Khan BA BEd	08.04.1960	SWA	11/04/1978	27/03/2010	17	By Promotion	HM GHS Karama SWTD at Tank	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
378	Muhammad Hanif MA BEd	14.03.1963	Mardan	18/04/1985	27/03/2010	17	By Promotion	HM GHS Tambulak Mardan	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
379	Shanif Gul BSc BEd	15.07.1960	Charsadda	01/10/1984	27/03/2010	17	By Promotion	HM GHS Sorizai Payan Peshawar	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
380	Fand Ullah BA BEd	09.01.1960	D.I.Khan	30/10/1985	27/03/2010	17	By Promotion	HM GHS Mandra Qalan DIK	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
381	Faiz ur Rehman BA BEd	25.05.1964	D.I.Khan	11/12/1985	27/03/2010	17	By Promotion	HM GHS Rooji Khel Di Khan	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
382	Abdur Ranim BSc BEd	01.01.1961	D.I.Khan	10/10/1985	27/03/2010	17	By Promotion	HM GHS Bazid Khel Kohat	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
383	Salahud Din MA BEd	01.08.1960	Bannu	01/12/1983	27/03/2010	17	By Promotion	HM GHS Kotka Hayatullah Lakki Marwat	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
384	Zahid Khan MA BEd	15.03.1961	Khyber Agency	07/04/1979	27/03/2010	17	By Promotion	HM GHS Kharnali Landi Kotal Khyber	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
385	Muhammad Niaz BSc BEd	14.04.1964	Peshawar	22/03/1983	27/03/2010	17	By Promotion	HM GHS Akhunabad Peshawar	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
386	Hafiz Muhammad Saddiq BA BEd	15.04.1962	Bairour Agency	02/12/1984	27/03/2010	17	By Promotion	HM GHS Knar No.2 Baiaur	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
387	Ali Muhammad BSc MEd	29.10.1962	Dir Lower	10/05/1986	27/03/2010	17	By Promotion	HM GHS Gul Muqam Dir Lower	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
388	Dur Jan MA BEd	04.01.1962	NWA	15/07/1986	27/03/2010	17	By Promotion	HM GHS Tappi NWTD	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
389	Sami ur Rehman BSc MEd	26.03.1963	Charsadda	20/07/1986	27/03/2010	17	By Promotion	HM GHS Wardaga Charsadda	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
390	Ghanda Khan BSc BEd	15.12.1962	Peshawar	27/11/1985	27/03/2010	17	By Promotion	HM GHS Tehkal Payan Peshawar	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
391	Akhtar Zaman BSc BEd	15.01.1961	Bannu	29/10/1985	27/03/2010	17	By Promotion	HM GHS Shukrullah Hussain Mandan Bannu	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
392	Fazal Muhammad BA BEd	13.03.1961	Mardan	15/10/1981	27/03/2010	17	By Promotion	HM GHS Faram Koroona Mardan	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
393	Hidayat ul Haq BSc BEd	06.04.1961	Cnarsadda	01/12/1986	27/03/2010	17	By Promotion	HM GHS Satti Abad Charsadda	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
394	Ghulam Sarwar MA/B.Ed.	17.08.1963	Peshawar	01/12/1986	24/05/2010	17	By Promotion	HM GHS Sheikh Muhammadi Peshawar	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 24.05.2010
395	Muhammad Islam MA BEd	20.03.1964	Swabi	15/01/1987	27/03/2010	17	By Promotion	HM GHS Spin Kani Swabi	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
396	Hameed Ullah MA MEd	02.04.1962	Charsadda	10/11/1986	27/03/2010	17	By Promotion	GHS Gonda Charsadda	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
397	Habib ur Rehman MA BEd	04.10.1960	Bannu	19/01/1987	27/03/2010	17	By Promotion	HM B-17 service placed at the disposal of DE FATA	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
398	Payo Gul MA BEd	07.04.1961	FR Bannu	19/01/1987	27/03/2010	17	By Promotion	HM GHS Daroa Khel-North Waziristan	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
399	Muhammad Farooq MA BEd	17.04.1961	Karak	12/10/1987	27/03/2010	17	By Promotion	HM GHS Surati Killa Karak	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
400	Abdur Rashid MA BEd	01.04.1964	D.I.Khan	13/06/1987	27/03/2010	17	By Promotion	SS GHSS Chaudhwan Di Khan	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
401	Sher Afzal Khan MA BEd	29.06.1960	Bannu	22/11/1982	27/03/2010	17	By Promotion	HM GHS Pahar Khel Pacca Lakki	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
402	Ikrumullah MABEd	01.01.1961	Peshawar	01/01/1987	27/03/2010	17	By Promotion	HM GHS Larama Peshawar	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
403	Bahadar Nawaz MA BEd	25.10.1961	FR Bannu	12/10/1982	24/01/2011	17	By Promotion	HM B-17 service placed at the disposal of DE FATA	SO(PE)2-6/E&SE/DPC Meeting/2011: dated 24.01.2011
404	Rafi ud Din MA BEd	04.04.1961	NWA	10/12/1981	24/01/2011	17	By Promotion	HM B-17 service placed at the disposal of DE FATA	SO(PE)2-6/E&SE/DPC Meeting/2011: dated 24.01.2011
405	Munir Hussain BSc BEd	15.08.1960	Kurr.Agy	14/12/1986	24/01/2011	17	By Promotion	HM B-17 service placed at the disposal of DE FATA	SO(PE)2-6/E&SE/DPC Meeting/2011: dated 24.01.2011
406	Fiaz Muhammad BA BEd	03.05.1962	Mansehra	30/04/1987	24/01/2011	17	By Promotion	HM GHS Data Mansehra	SO(PE)2-6/E&SE/DPC Meeting/2011: dated 24.01.2011
407	Haq Nawaz MA BEd	01.04.1961	Abbottabad	09/11/1981	24/01/2011	17	By Promotion	HM GHS Parhara Haripur	SO(PE)2-6/E&SE/DPC Meeting/2011: dated 24.01.2011
408	Ashiq Hussain BA BEd	25.09.1961	Kohat	18/01/1982	24/01/2011	17	By Promotion	HM GHS Kohat	SO(PE)2-6/E&SE/DPC Meeting/2011: dated 24.01.2011
409	Rahim Shah MA/M.Ed.	15.02.1961	Swabi	03/02/1986	24/01/2011	17	By Promotion	HM GHS Takail. Gadoon Swabi	SO(PE)2-6/E&SE/DPC Meeting/2011: dated 24.01.2011

16-

Handwritten signature and stamp at the top right of the page.

S.#	Name of Officers with Qualification	D.O Birth	Domicile	Date of 1st Entry in Edu	Regular appointment/promotion to			Designation/Place of Posting	Remarks
					Reg. Date	Grade	Method of Recruitment		
45	Syed Attaullah Jan V.Sc./M.Ed SS Biology	01.04.1975	Chitral	14/04/2007	5/3/2010	17	By Regularization	GHSS Mastui Upper Chitral	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
46	Hesam Khan MA V.Ed SS Urdu	05.02.1975	Nowshera	22/09/2008	5/3/2010	17	By Regularization	GHSS Khair Abad, Nowshera	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
47	Shoaib Gul M.Sc./V.Ed SS Statistics	05.11.1976	Mangoo	14/04/2007	5/3/2010	17	By Regularization	GHSS Doaba, Hangu	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
48	Zarif Shad MA V.Ed SS PS	13.12.1976	Dir Lower	24/09/2009	5/3/2010	17	By Regularization	GHSS Serai Bela, Dir Lower	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
49	Ghani Khan MA/V.Ed SS History cum Civics	06.03.1977	Charsadda	04/05/2007	5/3/2010	17	By Regularization	GHSS Umar Payan Peshawar	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
50	Malik Muhammad Kalim Zeb M.Sc./M.Ed SS Chemistry	06.05.1977	Mansehra	16/04/2007	5/3/2010	17	By Regularization	GHS Sherpur Mansehra	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
51	Muhammad Athar VA V.Ed SS Urdu	20.01.1979	Dir Upper	14/04/2007	5/3/2010	17	By Regularization	GHSS Gandigar, Dir Upper	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
52	Amjad Hussain MA/M.Ed SS Economics	01.04.1979	Chitral	10/03/2007	5/3/2010	17	By Regularization	GHSS Arun Lower Chitral	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
53	Zubair Ali Khan V.Sc./M.Ed SS Chemistry	04.09.1979	Varoan	24/09/2009	5/3/2010	17	By Regularization	GHSS Charnir Mardan	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
54	Tahir Ullah Jan VA V.Ed SS English	20.09.1981	Di Khan	14/04/2007	5/3/2010	17	By Regularization	A.C. DIK BISE	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
55	Asad Ali VA M.Ed SS H/Civics	05.04.1983	Swabi	14/04/2007	5/3/2010	17	By Regularization	GHSS Adina Swabi	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
56	Muhammad Saad VA M.Ed SS Maths	01.06.1976	Karak	01/09/2005	5/3/2010	17	By Regularization	GHSS Nari Panoos, Karak	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
57	Shafiq Ullah SS English	01.04.1979	Dir Upper	24/09/2009	5/3/2010	17	By Regularization	GHSS Qalandi Dir Upper	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
58	Attaullah VA/V.Ed SS Islamiyat	08.06.1979	Swat	26/12/2008	5/3/2010	17	By Regularization	GHSS Kabal Swat	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
59	Abdul Jalil V.Sc./V.Ed SS Chemistry	30.03.1980	Malakand	26/12/2008	5/3/2010	17	By Regularization	GHSS Khar Malakand	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
60	Rafiq Hussain VA/V.Ed SS English	04.04.1980	Pesrawar	10/01/2008	5/3/2010	17	By Regularization	G-SS Dhakki Charsadda	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
61	Muhammad Saeed V.Sc./M.Ed SS Physics	01.02.1981	D.I. Khan	24/09/2007	5/3/2010	17	By Regularization	GHSS Drabhan Khurd Di Khan	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
62	Muhammad Asif MA V.Ed SS Urdu	01.04.1982	Karak	01/01/2009	5/3/2010	17	By Regularization	GHSS Karak	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
63	Muhammad Sa'ad M.Sc./V.Ed SS Physics	01.01.1985	D.I. Khan	24/09/2007	5/3/2010	17	By Regularization	GHSS Lar Di Khan	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
64	Muhammad Ayaz MA V.Ed SS Islamiyat	10.05.1969	Swat	10/09/2005	5/3/2010	17	By Regularization	GHSS Bankot Swat	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
65	Muhammad Ismail V.Sc./M.Ed SS Chemistry	17.03.1971	Dir	15/09/2005	5/3/2010	17	By Regularization	G-SS Chakara, Dir Lower	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
66	Abdul Waseed VA V.Ed SS Urdu	01.01.1972	Mansehra	14/04/2007	5/3/2010	17	By Regularization	GHSS No's Mansehra	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
67	Abdul Basit Siddiqui VA/V.Ed SS H/Civics	15.09.1974	Nowshera	22/09/2005	5/3/2010	17	By Regularization	G-SS Ziarat Kaka Sahib Nowshera	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
68	Sultan-ud-Din M.Sc./P.H.D/V.Ed SS Biology	20.04.1978	Swat	26/12/2008	5/3/2010	17	By Regularization	GHSS Barkhela Swat	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
69	Mian Abdul Valik M.Sc/Phy/M.Ed SS Physics	07.03.1979	Mansehra	30/04/2007	5/3/2010	17	By Regularization	GHSS Garhi Habib Ullah Mansehra	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
70	Muhammad Nasir Khan V.Sc./M.Ed SS Maths	02.04.1980	Chitral	14/04/2007	5/3/2010	17	By Regularization	GHSS Ayan Chitral	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
71	Muhammad Ramzan V.Sc./M.Ed SS Stats	08.09.1980	D.I. Khan	02/02/2007	5/3/2010	17	By Regularization	GHSS Kech, D.I. Khan	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
72	Jehar Ali MA V.Ed SS Maths	03.07.1980	Charsadda	24/09/2009	5/3/2010	17	By Regularization	GHSS Umarzai	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
73	Riaz Muhammad V.Sc./V.Ed SS Biology	01.01.1974	Yardan	10/09/2005	5/3/2010	17	By Regularization	GHSS Monsoori Aoad Mardan	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
74	Inayat ur Rehman MA V.Ed SS Islamiyat	15.02.1974	Abbotabad	18/04/2007	5/3/2010	17	By Regularization	GHSS Naqri Bata	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
75	Fazli Manan MA/M.Ed SS Peshto	01.02.1975	Mohmand Agency	14/09/2008	2/25/2012	17	By Regularization	GHSS Sherpur Charsadda	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 25-02-2012
76	Siraj ud Din MA M.Ed SS Urdu	02.06.1975	D.I. Khan	06/10/2007	5/3/2010	17	By Regularization	GHSS Yarak, D.I. Khan	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
77	Muhammad Basharat VA M.Ed SS Maths	02.04.1976	Abbotabad	14/04/2007	5/3/2010	17	By Regularization	GHSS Bandi Dhunda, Aid	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
78	Bakht Zaman Shah V.Sc./B.Ed SS Physics	29.07.1976	Mardan	24/09/2009	5/3/2010	17	By Regularization	GHSS Pir Aoad	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
79	Saif Ali M.Phil/M.Ed SS H/Civics	20.12.1976	Swat	24/09/2009	5/3/2010	17	By Regularization	GHSS Salogram Swat	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
80	Qamar Zaman M.Sc./M.Ed SS Biology	28.03.1977	Bannu	26/12/2008	5/3/2010	17	By Regularization	GHSS Amendi Umer Khan Bannu	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
81	Muhammad Alam M.Sc./B.Ed SS Chemistry	20.05.1977	Mohmand Agency	24/09/2009	5/3/2010	17	By Regularization	GHSS Daag Peshawar	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
82	Zahoor ul Haq MA M.Ed SS Islamiyat	26.01.1978	Abbotabad	06.03.007	5/3/2010	17	By Regularization	GHSS Langoral Abbotabad	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
83	Fazil Rahman MA M.Ed SS Urdu	13.05.1978	Buner	01/02/2007	5/3/2010	17	By Regularization	GHSS Godezal	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
84	Muhammad Ismail M.Sc SS Physics	14.04.1978	Charsadda	17/09/2011	5/3/2010	17	By Regularization	GHSS Gandbar, Buner	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
85	Acid Ullah MA M.Ed SS Islamiyat	03.03.1980	Mardan	16/06/2010	5/3/2010	17	By Regularization	GHSS Shahbaz Garhi	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
86	Afrasyab VA M.Ed SS H/Civics	17.09.1980	Bannu	13/10/2007	5/3/2010	17	By Regularization	GHSS Paind Khel	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
87	Mashter Elani MA M.Ed SS PS	21.09.1981	Peshawar	26/12/2008	5/3/2010	17	By Regularization	GHSS Sulaid Sang, Peshawar	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
88	Muhammad Tariq Ullah MSc SS Physics	02.05.1982	Lakki	24/09/2009	5/3/2010	17	By Regularization	GHSS Shahbaz Khel	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
89	Rukhsar Ali Khan M.Sc/M.Ed SS Physics	12.03.1983	Bannu	24/09/2007	5/3/2010	17	By Regularization	GHSS Bardi Khan, Bannu	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
90	Inam Ullah S/O Rafiqullah MA M.Ed SS PS	01.04.1974	Dir Lower	24/09/2009	5/3/2010	17	By Regularization	GHSS Vuuda, Dir	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
91	Muhammad Zubair Khan MA M.Ed SS Islamiyat	01.01.1975	Peshawar	19/10/2005	5/3/2010	17	By Regularization	GHSS No 2 City Peshawar	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
92	Hakimullah SS (Phy)	04.02.1975	Shangla	22/09/2009	5/3/2010	17	By Regularization	GHSS Sandovi, Shangla	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
93	Shafiq Muhammad MA V.Ed SS H/Civics	14.04.1975	Malakand	24/09/2009	5/3/2010	17	By Regularization	GHSS Knar	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
94	Ilyas Ahmad MA M.Ed M.Phil SS PS	08.10.1975	Charsadda	10/01/2008	5/3/2010	17	By Regularization	GHSS Umarzai Charsadda	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
95	Hafiz Muhammad MA V.Ed SS H/Civics	15.11.1975	Buner	24/09/2009	5/3/2010	17	By Regularization	GHSS Godezal	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
96	Mukhtar Ahmad M.Sc./M.Ed SS Chemistry	15.04.1976	Malakand	11/01/2008	5/3/2010	17	By Regularization	GHSS Ghani Dheri Mardan	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
97	Muhammad Salim SS English	10.12.1976	Mansehra	24/09/2009	5/3/2010	17	By Regularization	GHSS Doga, Mansehra	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010
98	Iqbal ul Haq SS English	17.05.1977	Mansehra	24/09/2009	5/3/2010	17	By Regularization	GHSS Trappi, Mansehra	NO.SO (G) EA S/1-85/2009/SS/ Contract Dated 31-05-2010

S.#	Name of Officers with Qualification	D.O Birth	Domicile	Date of 1st Entry in Edu	Regular appointment/promotion to			Designation/Place of Posting	Remarks
					Reg. Date	Grade	Method of Recruitment		
3407	J463		Mardan		12.02.2020	17	BY promotion	SS (Physics) BS-17 GHSS Narshak Mardan	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3408	AMIR ULLAH	15.11.1982	NWA	01.12.2011	12.02.2020	17	BY promotion	SS (Maths) BS-17 GHSS Darsamand Hangu	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3409	MAULA JAN	14.06.1970	SWTD	01.12.2011	12.02.2020	17	BY promotion	SS (Maths) BS-17 GHSS Gul Imam Tank	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3410	MUHAMMAD AMIN	20.01.1971	Malakand	22.04.1999	12.02.2020	17	BY promotion	SS (Physics) BS-17 GHSS Totai Malakand	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3411	ABDUS SAMI	05.04.1972	Nowshera	24.04.1998	12.02.2020	17	BY promotion	SS (Physics) BS-17 GHSS Shaidu Nowshera	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3412	MUHAMMAD JEHAZEB KHAN	01.04.1974	Peshawar	18.02.1998	12.02.2020	17	BY promotion	SS (Economics) BS-17 GHSS Kati Ghar Mardan	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3413	MUHAMMAD ISRAR	10.2.1977	Mardan	25.01.2010	12.02.2020	17	BY promotion	SS (Physics) BS-17 GHSS Kohi Barmol Mardan	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3414	ASLI SHER	2.3.1979	Mchmand	21.11.2005	12.02.2020	17	BY promotion	SS (Physics) BS-17 GMHSS Painsi China Khyber	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3415	BAZ MUHAMMAD KHAN	28.05.1980	Bannu	14.03.2012	12.02.2020	17	BY promotion	SS (Economics) BS-17 GHSS Wanda Lati D.I.Khan	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3416	NAIK ZAMAN	13.03.1981	Bannu	30.08.2006	12.02.2020	17	BY promotion	SS (Economics) BS-17 GHSS Katgarh D.I.Khan	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3417	GHULAM HABIB ULLAH	24.02.1980	Haripur	22.11.2011	12.02.2020	17	BY promotion	SS (Maths) BS-17 GHSS Naro Banda Swabi	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3418	ABDUL QADEER	22.12.1982	Abbottabad	24.11.2011	12.02.2020	17	BY promotion	SS (Maths) BS-17 GHSS Peshora Battagram	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3419	MUHAMMAD TASLEEM	28.12.1984	Mansehra	24.11.2011	12.02.2020	17	BY promotion	SS (Physics) BS-17 GHSS Peshura Battagram	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3420	AMIN SHAH	1.12.1970	Abbottabad	20.05.1993	12.02.2020	17	BY promotion	SS (Maths) BS-17 GHSS Arandu Chitral	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3421	NISAR AHMAD KHAN	08.07.1971	Dir Lower	3.3.2004	12.02.2020	17	BY promotion	SS (Physics) BS-17 GHSS Kambat Dir Lower	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3422	NISAR AHMED GCMSS	11.01.1975	Abbottabad	1.3.2000	12.02.2020	17	BY promotion	SS (Physics) BS-17 GHSS Salabat Mansehra	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3423	BAHRI ALAM	04.03.1975	Buner	1.9.1995	12.02.2020	17	BY promotion	SS (Physics) BS-17 GHSS Amnawar Buner	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3424	MUHAMMAD FAISAL	5.11.1981	Abbottabad	25.11.2011	12.02.2020	17	BY promotion	SS (Maths) BS-17 GHSS Bagra Buner	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3425	SAQIB KHAN	08.01.1976	Abbottabad	10.3.2012	12.02.2020	17	BY promotion	SS (Physics) BS-17 GHSS Seri Goria Mansehra	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3426	MUHAMMAD NAWAZ KHAN	16.04.1978	Bannu	19.09.2007	12.02.2020	17	BY promotion	SS (Economics) BS-17 GHSS Darsamand Hangu	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3427	MUHAMMAD BASHARAT	1.1.1976	Mansehra	5.9.2012	12.02.2020	17	BY promotion	SS (Maths) BS-17 GHSS Thakot Battagram	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3428	QAMAR UZ ZAMAN SAJID	16.03.1976	Abbottabad	1.12.2011	12.02.2020	17	BY promotion	SS (Physics) BS-17 GHSS Paimal Sharif Mansehra	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3429	ABDUL HALEEM KHAN	3.3.1977	Swat	20.12.2011	12.02.2020	17	BY promotion	SS (Physics) BS-17 GHSS Tail Swat	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3430	SHAHZAD AHMED	15.03.1977	Haripur	11.02.2006	12.02.2020	17	BY promotion	SS (Physics) BS-17 GHSS Barkot Haripur	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3431	NOOR UL ANWAR KHAN	28.01.1979	Peshawar	03.03.2012	12.02.2020	17	BY promotion	SS (Economics) BS-17 GHSS Narangi Swabi	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3432	SHAHID ALI KHAN	08.05.1979	Swat	30.09.2005	12.02.2020	17	BY promotion	SS (Economics) BS-17 GHSS Barawal Swat	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3433	ALTAF HUSSAIN	5.4.1980	Charsadda	03.01.2012	12.02.2020	17	BY promotion	SS (Economics) BS-17 GHSS Qasimi Mardan	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3434	SYED RAHMAN SHAH	05.09.1980	Peshawar	20.11.2004	12.02.2020	17	BY promotion	SS (Economics) BS-17 GHSS Tarakai Swabi	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020

S.#	Name of Officers with Qualification	D.O Birth	Domicile	Date of 1st; Entry In Edu	Regular appointment/promotion to			Designation/Place of Posting	Remarks
					Reg. Date	Grade	Method of Recruitment		
3435	MUHAMMAD SAIFULLAH KHAN	09.11.1983	Peshawar	17.03.2012	12.02.2020	17	BY promotion	SS (Maths) BS-17 GHSS Regi Peshawar	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3436	SHAH HUSSAIN	3.3.1985	Dir Lower	30.11.2011	12.02.2020	17	BY promotion	SS (Physics) BS-17 GHSS Mayar Dir Lower	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3437	KHALID ZAHEER KHAN	22.03.1979	Haripur	19.11.2007	12.02.2020	17	BY promotion	SS (Maths) BS-17 GHSS Bagh Buner	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3438	ABDUL QAYUM KHAN	16.04.1976	Bannu	20.04.1999	12.02.2020	17	BY promotion	SS (Economics) BS-17 GHSS Naryab Hangu	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3439	RAHMAN UL HAQ	1.1.1978	Bannu	10.03.2005	12.02.2020	17	BY promotion	SS (Economics) BS-17 GHSS Lodhi Khel Hangu	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020
3440	SAJEED GUL	8.3.1974	Mardan	2.9.2010	12.02.2020	17	BY promotion	SS (Economics) BS-17 GHSS Garyala Mardan	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17(teaching Cadre) Dated 12.02.2020

181

Deputy Director (Estab)
 Directorate of Elementary & Secondary Education
 Khyber Pakhtunkhwa Peshawar

M. ATIQUL AMRAN
 Advocate Supreme Court
 D.I.Khwa

- 19 -

VAKALATNAMA

BEFORE THE **KPK SERVICE TRIBUNAL Branch** DERA ISMAIL KHAN

Farid ullah **VERSUS** *Govt of KPK etc*

TITLE *Appeal*

I/WE *Appellant*

The Above Named *Farid ullah* hereby appoint

MUHAMMAD ANWAR AWAN ADVOCATE SUPREME COURT,

in the above Captioned Cases to all or any of the following Acts Deeds & Things.

- ✓ To Appear, Act & Plead for Me/Us in the above mentioned cases in this Court/Tribunal in which the same may be tried or heard or any other proceedings out of our connected therewith.
- ✓ To Sign, Verify, File OR Withdraw all proceedings, Petitions, Appeals, Affidavits, Applications for Compromise OR Withdrawals OR for the Submission of Arbitration of the said case OR any other Documents may be Deemed Necessary OR Advisable by them by the Conduct, Prosecution OR Defense of the above case at all its stages.
- ✓ To Receive Payments, Issue receipts for all moneys that may be OR become Due & Payable to us during the course on Conclusion of the Proceedings.
- ✓ To do all other Acts & Things, Which may be Deemed Necessary OR Advisable during the course of Proceedings.

AND HEREBY AGREE:

- To Ratify Whatever Advocates may do the Proceedings.
- Not to Hold the Advantages Responsibilities if the said case be proceed Ex-parte OR Dismissed in Default in Consequence of their Absence from the Court when it is called for Hearing.
- That the Advocates shall be entitled to withdraw from the Prosecution of the said case if the Whole or any part of the Agreed Fee Remain Un-Paid.
- That Advocates may be Permitted to argue any other point at the time of Arguments.

In Witness Whereof I/We have signed this Vakalatnama here under the Contents of which have been Read/Explained to Me/Us which is fully understood by Me/Us.

Dated: *16/9/2021*

Farid ullah - - - - *Appellant*

Accepted By:

Muhammad Anwar Awan

SIGNATURE OF EXECUTANT (S)

[Signature]

03468886585

**MUHAMMAD ANWAR AWAN
ADVOCATE SUPREME COURT
03339962231**

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 7444/2021

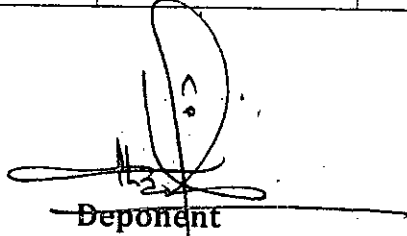
Farid Ullah

VS

Government of KPK

Index

SNo	Description of documents	Annexure	Page No.
01	Para wise comments		01-02
02	Affidavit		03
03	Authority		04



Deponent

Dr. Khalid Saeed Akbar
Divisional Litigation Officer
Secretariat & Directorate of E&SE KP Peshawar

(01)

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 7444/2021
Farid Ullah VS Government of KPK

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

Preliminary objections

- 1) That the appellant is not an aggrieved person under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974.
- 2) That the appellant has not come to this Honourable Tribunal with clean hands rather the instant appeal is mainly based on malafide intension and just to put the pressure on the respondents department for illegal promotion.
- 3) That the service appeal is not maintainable due to mis-joinder and non-joinder of necessary parties.
- 4) That the appellant has got no cause of action / locus standi.
- 5) That the appellant has filed the instant appeal on malafide objectives.
- 6) That the instant appeal is against the prevailing law and rule.
- 7) That the instant appeal is against the facts and on grounds circumstances.

Respectfully Sheweth

- 1) Para pertains to the appointment of appellant as Subject Specialist Pashto (BS-17) vide Notification dated 20.06.2019, hence no comments.
- 2) This para is related to the posting of appellant as Head Master GHS Wanda Dost Ali DIKhan, hence no comments.
- 3) Incorrect / not admitted. The Notification Dated, 24.08.2021 the government of Khyber Pakhtunkhwa raised the issue of wrong posting. The E&SE Department vide Notification Dated 24.08.2021 announced that the entire wrongly adjusted officer may apply for their respective post through E-Transfer computer application. Most of the subject specialist were wrongly adjusted Head Master and vice versa. The present appellant being Subject Specialist (Pashto) was wrongly adjusted against the post of Head Master. Therefore, the respondents department issue Notification of E-Transfer regarding wrong posting of officers. It is an admitted fact that the post of Head Master and Subject Specialist are two different cadres. The responsibility of Head Master is look after of the school (administrative job) whereas the responsibility of the Subject Specialist are to teach their respective subject to the classes of FSc/FA. Due to non availability of Subject Experts in the Govt Higher Secondary Schools students are suffering a lot. Therefore, the Notification Dated 24.08.2021 is justified in eye of law.
- 4) Incorrect/not admitted and strongly denied. Present appellant is not an aggrieved person. The service appeal of the appellant is an exercise in futility. Further proceeding in this regard would bear no fruit. It is, therefore, requested to this Honourable Tribunal to dismiss the Service Appeal of the appellant with cost.


Objections on Grounds

02

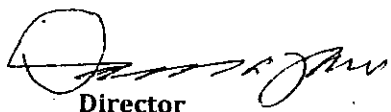
- a. Incorrect / not admitted. The act of the respondents was according to law, based upon the natural principle of justice. No discrimination had been made with the present appellant.
- b. Incorrect and not admitted. Strongly denied. The Subject Specialist and Head Master both are different cadres and both have different job responsibilities. Therefore, it will be injustice to say that Subject Specialist and Head Master both is same cadre. It is further added that the respondent department had initiated working regarding separation of seniority of both cadres and in near future the seniority of both cadres will be separated being different job responsibilities. It is further added that the Head Master BS-17 will be promoted to the post of Principal BS-18 and whereas Subject Specialist BS-17 will be promoted to the post of Senior Subject Specialist BS-18. Hence the claim of the appellant is against the law.
- c. This para is correct, that in Notification Dated 24.08.2021 the officers of BS-18 were exempted because office of the respondent No. 1 will make adjustment of officer of BS-17 on the basis of wrong posting and in the next step the office of the respondent No. 1 will make adjustment of wrongly adjusted officers of BS-18 and 19, hence the plea of the appellant is against the law and policy of the government.
- d. Incorrect / not admitted. All the wrongly adjusted officers of the respondents department will be adjusted according to their respective designation. No one will be allowed to work against the wrong post.
- e. The counsel for respondents may kindly be allowed to raise additional grounds at the time of arguments.

Pray

Therefore, it is, requested to this Honourable Tribunal to dismiss the Service Appeal of the appellant because the Service Appeal of the appellants is only an exercise in futility because original post of appellant is Subject Specialist and he is working against the wrong post of Head Master.



Secretary
Elementary & Secondary Education Department
Khyber Pakhtunkhwa Peshawar



Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar



District Education Officer
(M) Dera Ismail Khan

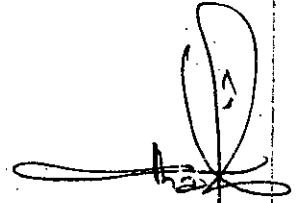
BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 7444/2021

Farid Ullah VS Government of KPK

Affidavit

I, Dr. Khalid Saeed Akbar Divisional Litigation Officer for Secretariat and Directorate of Elementary & Secondary Education Department KPK Peshawar do hereby solemnly affirm and declared on oath that the contents of above mentioned service appeal are correct to the best of my knowledge and nothing has been concealed from this Honourable Tribunal.



Deponent
Dr. Khalid Saeed Akbar
12101-0899674-5

(04)

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 7444/2021

Farid Ullah

VS

Government of KPK

Authority

I, District Education Officer (M) Dera Ismail Khan Respondent No. 3 do hereby authorized Dr. Khalid Saeed Akbar Divisional Litigation Officer for Directorate and Secretrate of E&SE KPK Peshawar to attend this Honourable Service Tribunal KPK Peshawar on behalf of respondents in connection with submission of para wise comments and till the decision of the service appeal.

Respondent No.3


District Education Officer
(Male) Dera Ismail Khan

"A"

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

No.

APPEAL No..... 7444 of 20

Farid Ullah

Appellant/Petitioner

Versus

Sery. (ESSE) P.S.V

RESPONDENT(S)

Notice to Appellant/Petitioner

Farid Ullah Head Master

GHS Wanda Dost Ali

D/Khu

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 26-1-22 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/Khu

S

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No.....7444..... of 20 ..

Farid Ullah

Appellant/Petitioner

Versus

Serg. (EGS) Pesh

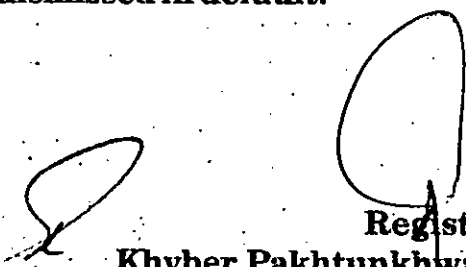
RESPONDENT(S)

Notice to Appellant/Petitioner ^{Counsel} Mohd Arshad Aman
Adv.
HIGH COURT DIKHU

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 26-1-22 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
DIKHU


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.