

28.09.2022

Learned counsel for the appellant present. Dr. Khalid Khan, Instructor on behalf of respondents No. 1 to 3 alongwith Mr. Muhammad Adeel Butt, Additional Advocate General present.

Para-wise comments on behalf of respondents No. 1 to 3 submitted, copy of which handed over to learned counsel for the appellant. Adjourned. To come up for rejoinder, if any, as well as arguments on 25.10.2022 before the D.B at Camp Court D.I.Khan.



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

25.10.2022

Appellant present through counsel.

Muhammad Jan, learned District Attorney for respondents present.

File to come up alongwith connected Service Appeal No.7456/2021 titled Waheed Khan Vs. Government of Khyber Pakhtunkhwa on 22.11.2022 before D.B at Camp Court, D.I Khan.



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

20.02.2022

Due to retirement of the Hon'ble Chairman, the Tribunal is defunct. To come up for the same on 28.03.2022 before S.B.,

  
Reader

28.03.2022

Counsel~~s~~ are on strike. To come up for preliminary hearing tomorrow on 29.03.2022 before S.B at camp court, D.I.Khan.



CHAIRMAN,  
Camp Court, D.I.Khan

29.03.2022

Counsel for the appellant present.

To come up alongwith similar appeals No. 7443/2021 and 7444/2021 for preliminary hearing on 24.05.2022 before S.B at camp court, D.I.Khan.



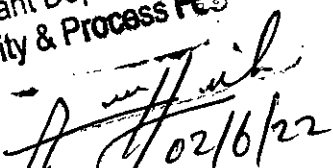
CHAIRMAN,  
Camp Court, D.I.Khan

24.05.2022

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of reply/comments. To come up for reply/comments on 27.07.2022 before S.B at Camp Court, D.I.Khan.

Rs-600/-  
Appellant Deposited  
Security & Process Fee

  
27-7-22

Due to summer vacation to  
come up for the same on 28/9/22



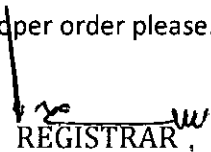


  
(Rozina Rehman)  
Member (J)  
Camp Court, D.I.Khan

Form- A

## FORM OF ORDER SHEET

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

Case No. - 7457 / 2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/09/2021	<p>The appeal of Mr. Muhammad Rashid presented 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 S. Bench at Peshawar. Notices be issued to appellant/counsel for preliminary hearing to be put up there on <u>23/11/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	23.11.2021	<p>Junior of learned counsel for the appellant present.</p> <p>Former requests for adjournment on the ground that learned senior counsel is not available. Adjourned. To come up for preliminary hearing on 20.01.2022 before S.B.</p> <p style="text-align: right;"> (MIAN MUHAMMAD) MEMBER (E)</p>

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: M. Rashid 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 paged?	✓	
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?	✓	
17	Whether list of books has been provided at the end of the appeal?	✓	No
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. ~~7457~~ of 2021. 7457/2021

M. Rashid

VERSUS

Govt of KPK and others

INDEX

No.	Particulars	Annexure	Pages
1	Appeal		1-4
2	Copy of Order Dated; 28-08-2018.	A	5-8
3	Copy of Office Order Dated; 22-10-2019	B	9
4	Copy of Notification Dated; 24-08-2021.	C	10
5	Copy of Departmental Appeal & Postal Receipts.	D	11
6	Copy of Seniority List.	E	12-16
7	Wakalat Nama.	F	17

Your humble Petitioner

M. Rashid

Dated; 18-09-2021.

*Anwar ad*

Mohammad Anwar Awan  
Advocate Supreme Court.

- 1 -

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

Appeal no..... of 2021.

Muhammad Rashid Head Master (BS-17) GHS Morga Darazinda 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.

*Answer*

**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 (BS-17) and adjusted in merged Area vide posting order Dated; 28-08-2018. Copy of order Dated; 28-08-2018 is Annexure A.
2. That the petitioner was posted as Head Master (BS-17) at Government High School Morga Darazinda D.I.Khan vide order Dated; 22-10-2019. The Appellant is still performing his duties as Head Master. Copy of Office Order Dated; 22-10-2019 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.
- 5. That feeling aggrieved from above said office orders, petitioner is constrained to approaches this honorable court on the following amongst other:

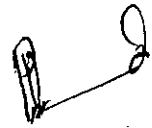
**GROUND S;**

*Annexure*

- 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



M. Rashid  
Through Counsel

Dated; 18-09-2021.



Mohammad Anwar Awan  
Advocate Supreme Court

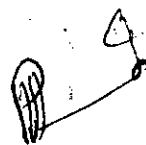
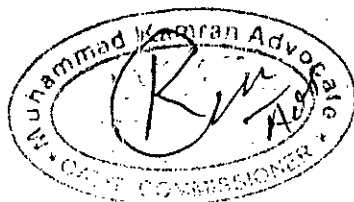
Certificate:-

It is certified that no Appeal is filed nor pending against impugn notification before Hon;ble Service Tribunal.

Deponent.

AFFIDAVIT

M. Rashid, 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.



**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.**

M. Rashid VS Govt; of KPK and others

APPEAL

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

Respectfully Sheweth,

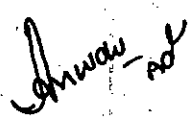
- 1- That the appellant being Subject Specialist, is working as Head Master in High School. Through impugn notification the Department is considering Subject specialist and Head Master being different cadre which is against law and rules. On the basis of impugn notification Department is transferring/ 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**



M. Rashid  
Through Counsel

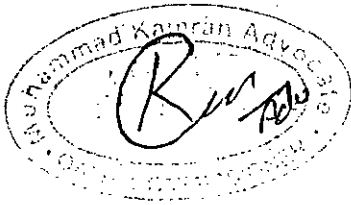


AFFIDAVIT;

M. Rashid, 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-

*(Handwritten mark)*



GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the August 25, 2018.

NOTIFICATION

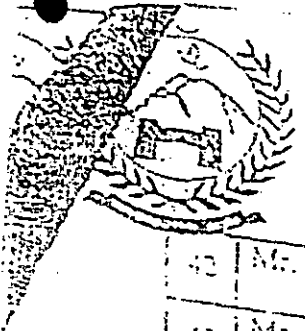
NO.SO(SM) E&SED/2-1/2018/posting/transfer/2018:

Consequent upon their

repatriation from merged areas (former FATA), posting/adjustment in to the following officers as mentioned against each is hereby ordered in the public interest with immediate effect:

S.No	Name of officer	New place of posting	Remarks
1.	Mr. Gohar Rehman	SS BS-17 (Biology) GHSS Gul Bela Peshawar.	Against vacant post.
2.	Mr. Haider Zaman	SS BS-17 (Biology) GHSS Mayar (Jandool) Dir Lower.	-do-
3.	Mr. Pir Zada Khan	SS BS-17 (Biology) GHSS Karbugha Sharif Flangu	-do-
4.	Mr. Gul Shehzad	SS BS-17 (Biology) GHSS Darsumahd Flangu	-do-
5.	Mr. Aliqur Rehman	SS BS-17 (Biology) GHSS Shorkot D.I.Khan	-do-
6.	Mr. Farmanullah	SS BS-17 (Biology) GHSS Haryana Peshawar	-do-
7.	Mr. Naseeb Zada	SS BS-18 (Biology) GHSS Munda Dir Lower (own pay & scale)	-do-
8.	Mr. Shoaibullah	SS BS-17 (Biology) GHSS Jandrai Karak	-do-
9.	Mr. Saleem Ullah	SS BS-18 (Biology) GHSS Munda Dir Lower (on-own pay scale)	-do-
10.	Mr. Hazrat Noor	SS BS-17 (Biology) GHSS Samar Bagh Dir Lower.	-do-
11.	Mr. Shakoorur Rehman	SS BS-17 (Biology) GHSS Katgarh D.I.Khan.	-do-
12.	Mr. Said Kamal Khan	SS BS-18 (Biology) GHSS Ketch D.I.Khan.	-do-
13.	Mr. Hayat Mohammad	SS BS-17 (Biology) GHSS Rabat Dir Lower	-do-
14.	Mr. Asghar Khan	SS BS-17 (Chemistry) GHSS Shakardara Kohat.	-do-
15.	Mr. Mohammad Rashid	SS BS-17 (Chemistry) GHSS Katgarh D.I.Khan	-do-
16.	Mr. Nashidullah Khan	SS BS-17 (Chemistry) GHSS Darsamand Flangu	-do-
17.	Mr. Riaz Khan	SS BS-17 (Economics) GHSS Bannu.	-do-
18.	Mr. Azmatullah Khan	SS BS-17 (Economics) GHSS Dhoda Kohat	-do-

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



GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

42	Mr. Dosta Khan		
43	Mr. Awal Bad Shah	SS BS-17 (Pashto) GHSS Abdul Khel Lakki Marwat	-do-
44	Mr. Shams Khan	SS BS-17 (Pashto) GHSS Shahbaz Khel Lakki Marwat	-do-
45	Mr. Deen Mohammad	SS BS-17 (Pashto) GHSS Khero Khel Pacca Lakki Marwat	-do-
46	Mr. Rasool Khan	SS BS-17 (Pashto) GHSS Gul Imam Tank	-do-
47	Mr. Rashidur Rehman	SS BS-17 (Pashto) GHSS Aderai Peshawar	-do-
48	Mr. Sajjad Ahmad	SS BS-17 (Pashto) GHSS Abu Khel Lakki Marwat	-do-
49	Mr. Nazam ul Din	SS BS-17 (Pashto) GHSS Bachkan Ahmad Zai Lakki Marwat	-do-
50	Mr. Naqibullah	SS BS-17 (Urdu) GHSS Towda China Dir Lower	-do-
51	Mr. Afzal Khan	HM BS-17 GHS Samandi Lakki Marwat	-do-
		HM BS-17 GHS Barati Machan Khel Bannu	-do-

Handwritten note on the right side of the table.

2. No TADA is allowed.

Encls: 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 Officer (M), Charsadda.
4. District Account Officer, Charsadda.
5. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
6. PA to Additional Secretary E&SED, Khyber Pakhtunkhwa.
7. Incharge EMIS E&SE Department.
8. Subject Specialist Concerned.
9. Office order file.

Mr. Awal Bad Shah  
Secretary to the Govt  
Peshawar

(MIAN HUSSAIN DIN)  
SECTION OFFICER (SCHOOLS-MALE)

**GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

Dated Peshawar the August 28, 2018

**Notification**

**NO.SO(SM) E&SED/2-1/2018/posting /transfer/2018:** Consequent upon their repatriation from merged areas (former FATA), posting-/ adjustment in r/o the following officers as mentioned against each is hereby ordered in the public interest with immediate effect:

S.#	Name of officer	New place of posting	Remarks
1.	Mr. Gohar Rehman	SS BS -17 (Biology) GHSS Gul Bela Peshawar.	Against vacant post.
2.	Mr. Haider Zaman	SS BS-17(Biology) GHSS Mayar (jandool)Dir Lower.	-do-
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4.	Mr. Gul Shahzad	SS BS-17 (Biology) GHSS Darsamabd Hangu	-do-
5.	Mr. Atiqur Rehman	SS BS-17(Biology) GHSS Shorkot D.I.Khan	-do-
6.	Mr. Farmanullah	SS BS-17 (Biology) GHSS Haryana Peshawar	-do-
7.	Mr. Naseeb Zada	SS BS-18 (Biology) GHSS mundn Dir Lower (own pay & scale)	-do-
8.	Mr. Shoaibullah	SS BS-17 (Biology) GHSS jandrai Karak	-do-
9.	Mr. Saleem Ullah	SS BS-18 (Biology) GHSS Mundn Dir Lower(on own pay scale)	-do-
10.	Mr. Hazaft Noor	SS BS-17(Biology) GHSS Samar Bagh Dir Lower	-do-
11.	Mr. Shakoourur Rehman	SS BS-17(Biology) GHSS Katgarh D.I.Khan	-do-
12.	Mr. Said Kamal Khan	SS BS-18(Biology) GHSS Ketch D.I.Khan	-do-
13.	Mr. Hayat Mohammad	SS BS-17(Biology) GHSS Rabat Dir Lower	-do-
14.	Mr. Asghar Khan	SS BS-17(chemistry) GHSS Shakardara Kohat	-do-
15.	Mr. Mohammad Rashid	SS BS-17(Chemistry) GHSS Katgarh D.I.Khan	-do-
16.	Mr. Nashidullah Khan	SS BS-17(Chemistry) GHSS Darsamand Hangu	-do-
17.	Mr. Riaz Khan	SS BS-17(Economics) GCHSS Bannu	-do-
18.	Mr. Azmatullah Khan	SS BS-17(Economics) GHSS Dhoda Kohat	-do-

Awar Awan  
Associate Supreme Court  
Peshawar

- 8 -

.....BETTER COPY.....

**GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

42	Mr. Dosta Khan	SS BS-17(Pashto)GHSS Abdul Khel Lakki Marwat	-do-
43	Mr. Awal Bad Shah	SS BS-17(Pashto) GHSS Shahbaz Khel Lakki Marwat	-do-
44	Mr. Shams khan	SS BS-17(Pashto) GHSS Khero Khel Pacca Lakki Marwat	-do-
45	Mr. Deen Mohammad	SS BS-17(Pashto) GHSS Gul Imam Tank	-do-
46	Mr. Rasool Khan	SS BS-17(Pashto) GHSS Adezai Peshawar	-do-
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49	Mr. Nizam ud Din	SS BS-17(Urdu) GHSS Towda China Dir Lower	-do-
50	Mr. Naqibullah	HM BS-17 GHS Samandi Lakki Marwat	-do-
51	Mr. Afzal Khan	HM BS-17 GHS Barati Machan Khel Bannu	-do-

**2. No TA/DA is allowed.**

**SECRETARY**

**Endst: of even No. & Date**

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa Peshawar
3. District Education Officer (M), Charsadda.
4. District Account Officer, Charsadda.
5. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
6. PA to Additional Secretary E&SED, Khyber pakhtunkhwa.
7. Incharge EMIS E&SE Department.
8. Subject Specialist Concerned.
9. Office order file.

**(MIAN HUSSAIN DIN)  
SECTION OFFICER (SCHOOLS MALE)**

Director AWDG  
Khyber Pakhtunkhwa  
Peshawar



B-7

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

Dated Peshawar the October 22, 2019

**CORRIGENDUM**

**NO.SO(SM)E&SED/7-1/2019/Posting/Transfer/General:-** In partial modification of this Department notification of even number dated 17.10.2019, the place of posting in respect of Mr. Muhammad Rashid, SS Chemistry (BS-17), may be read as HM (BS-17) GHS Morga Darazinda 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), Concerned.
4. District Accounts Officers, Concerned.
5. PS to Advisor to CM for E&SE Department.
6. PS to Secretary E&SE Department.
7. Director, EMIS E&SE Department.
8. Subject Specialist concerned.
9. Master file.

1.10/19  
5.2/10  
(SHAHID RAIQ)  
SECTION OFFICER (SCHOOLS MALE)

*Anwar*  
M. Anwar 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 No. 091-9221333

C-10-

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

Endst: 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.

M. A. Awan  
Additional Secretary  
E&SE Department

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

D-11-

The Chief Minister  
Khyber Pakhtunkhwa  
Peshawar.

Through: Proper Channel.

Subject: DEPARTMENTAL APPEAL AGAINST OFFICE ORDER DATED 24/08/2021.

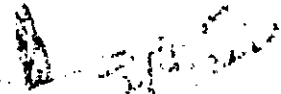
Respected Sir,

The appellant humbly submits as under:

1. That the appellant being Subject specialist (Chemistry) BS-17 working as Head Master at Government High School Morga Sub Division Darazinda D.I.Khan since 23-10-2019.
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 posted in wrong cadre. The Subject specialist and Head master have same cadre and their seniority list prepared by the department is the same. It is also worth mentioning that Subject specialist and head master were promoted with same seniority list to the post of Principal. Now the department in the light of office order dated: 24.08.2021 disturb/posting the appellant against any other post treating the appellant posted in wrong cadre which is totally illegal. The appellant being Subject specialist is working as Head Master in same cadre, so could not be affected on the basis of office order dated: 24.08.2021. It is a distressing fact that due to this wrong implementation most of post of Head Master would be vacant due to non-availability of Head Masters.

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.

Your Honorable Appellant

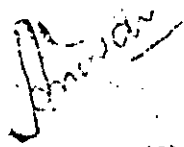


Muhammad Rashid

SS Chemistry

Head Master GHS Morga

S.D Darazinda D.I.Khan



M. Anwar Anwar  
Advocate, District Court  
D.I.Khan



E-12-

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

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		
1	AMJAD ALI M.A.B.ED	10.02.1972	MARDAN	25.05.1999	24.5.2018	17	BY promotion	SS English GHSS Mohabat Abad Mardan	
2	Adalat 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(SM)E&SE/2-1/2018/promotion SS-16 to BS-17
	Im Ullah S/o Safi ur Rahman SS Pak Study	22.04.1981	Dir	11.09.2003	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)
	hammad Kashif Khan S/o Muhammad Hayat SS Pak Study	12.09.1982	Monmand Agency	12.01.2010	12.01.2010	17	D/Selectee	GHSS Painsi Lalma Khyber	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
	ahmat 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)
	ed 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)
	q Ali S/o Noor Sarwar SS Economics	16.06.1983	Orakzai Agency	12.01.2010	12.01.2010	17	D/Selectee	GHSS Kalya Orakzai	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
	n 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	01.04.1985	10.01.2011	17	D/Selectee	GHS Koleka Vanseehra	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
10	Azam Jan S/o Jamazan SS Pak Study	01.01.1959	SWA	17.10.1989	12.01.2010	17	D/Selectee	GHSS Gagra Haripur	SO(SM)E&SED/3-2/2011/Various subject dated 10.01.2011(Merit 01/2009)
11	Muhammad Zubair Khan S/o Ahmad Shah SS Pak Study	02.04.1969	Karak	18.05.1992	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 Atta Ullah SS Pak Study	03.03.1972	Chitral	01.04.1992	12.01.2010	17	D/Selectee	GHSS Ayun Chitral	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
14	Shabir Muhammad S/o Mustafa SS Pak Study	10.06.1975	Battagram	28.08.1995	10.01.2011	17	D/Selectee	working as SJO (F) Judba Tor Ghar	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(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(SM)E&SED/3-2/2011/Various subject dated 10.01.2011(Merit 01/2009)
16	Asif Ali S/o Muhammad Afsar SS Pak Study	02.09.1976	Swabi	12.01.2010	12.01.2010	17	D/Selectee	SS GHSS Dabian Swabi	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
17	Shanid Ur Rahman S/o Abdul Anad SS Economics	12.12.1974	Chitral	10.04.1999	12.01.2010	17	D/Selectee	GHSS Baram Owir Chitral	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
18	Amir Zeb 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	Zamrad Khan S/o Lal Saig 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	Tariq Ahmad S/o Ahmad Sher SS Economics	01.01.1980	Shangla	02.12.2006	10.01.2011	17	D/Selectee	GHSS Sandovi, Shangla	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(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 Baffa Mansehra	SO(SM)E&SED/3-2/2011/Various subject dated 10.01.2011(Merit 01/2009)
22	Tayab Nawaz MA M.Ed SS Islamiyat	14.08.1981	Peshawar	10/10/2007	5/31/2010	17	By Regulariza	GHSS Mufasa	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
23	Ifkhar Ahmad MA M.Ed SS Maths	01.08.1983	Lakki Marwat	14/07/2007	5/31/2010	17	By Regulariza	GHSS Shahtaz Khel	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
24	Muhammad Rafiq MA M.Ed SS Islamiyat	01.04.1979	D.I.Khan	02/01/2007	5/31/2010	17	By Regulariza	GHSS Serai Bala, Dir Lower	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
25	Sher Bahadar Khan M.Sc./M.EdSS Chemistry	02.02.1981	Dir Lower	24/12/2008	5/31/2010	17	By Regulariza	GHSS Madain Swat	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
26	Irshad Ahmad MA M.Ed SS Maths	13.04.1982	Swat	25/12/2008	5/31/2010	17	By Regulariza	GHSS Landi Kachi Kohat	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	5/31/2010	17	By Regulariza	GHS Mandani Charsadda	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
28	Isa Khan M.Sc./M.EdSS Chemistry	25.05.1977	Mohmand Agency	01/09/2005	5/31/2010	17	By Regulariza	GHSS Drosch Chitral	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
29	Atta Ullah MA M.Ed SS English	02.01.1979	Chitral	28/04/2007	5/31/2010	17	By Regulariza	GHSS Tarnab Farm Peshawar	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
30	Ifkhar Ahmad MA M.Ed SS Stats	12.03.1979	Charsadda	02/10/2007	5/31/2010	17	By Regulariza	GHSS Baidara Swat	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
31	Fazli Rabbi MA M.Ed SS Islamiyat	20.05.1979	Swat	14/04/2007	5/31/2010	17	By Regulariza	GHSS Maneri Payan Swabi	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	5/31/2010	17	By Regulariza	GHSS Panian Haripur	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
33	Qazi Sajid Rashid MA M.Ed SS Islamiyat	01.03.1981	Haripur	24/09/2005	5/31/2010	17	By Regulariza	GHSS SS Acarai Buner	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
34	Hassan Feroosh MA M.Phil B.Ed SS Islamiyat	01.04.1981	Buner	14/04/2007	5/31/2010	17	By Regulariza	GHSS Mian Kalay Dir Lower	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	29.02.1983	Bajaur Agency	24/09/2009	5/31/2010	17	By Regulariza	GHSS Mandran Kalan, D.I.Khan	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	26/12/2008	5/31/2010	17	By Regulariza	GHSS Sunjovi Shangla	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
37	Abdur Rashid SS English	01.12.1973	Lakki	24/06/2009	5/31/2010	17	By Regulariza	GHSS Mandani Charsadda	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
38	Haq Nawaz SS (Eng)	10.04.1979	Shangla	24/09/2009	5/31/2010	17	By Regulariza	GHSS Tarnab Farm Peshawar	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	5/31/2010	17	By Regulariza	GHSS Sheikhan Peshawar	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
40	Gul Dayub Khan MA/M.EdSS History cum Civics	05.09.1971	NWA	10/09/2005	5/31/2010	17	By Regulariza	GHSS Garam Cheshama Chitral	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
41	Haziq ur Rehman MA M.Ed SS Stats	15.03.1975	Karak	04/10/2007	5/31/2010	17	By Regulariza	GHSS Hayatnagar 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	5/31/2010	17	By Regulariza	GHSS Hayatnagar Peshawar	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
43	Siraj Khan MA M.Ed SS Islamiyat	01.02.1980	Peshawar	10/09/2005	5/31/2010	17	By Regulariza	GHSS Hayatnagar Peshawar	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010
44	Wazir Jan M.Sc./M.EdSS Biology	01.03.1980	Dir Lower	24/04/2007	5/31/2010	17	By Regulariza	GHSS Hayatnagar Peshawar	NO.SO (G) E& S/1-85/2009/SS/ Contract Dated 31-05-2010



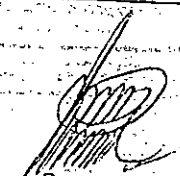
S.#	Name of Officers with Qualification	D.O Birth	Domicile	Date of 1st Entry in Edu	Reg. Date			Designation/Place of Posting	Remarks
					Reg. Date	Grade	Method of Recruitment		
364	Nasib Khan S/o Dary Khan SS Statistics	03.05.1977	Lakki Marwat	17.08.2010	15.06.2010	17	D/Selectee	GHSS Garni Sner Dad Pesahwar	SO(S)3-2/2004/(Male) dated 16.08.2010(Merit 01/2009)
365	Muhtamim Shah S/o Sherif Khan SS English	21.02.1978	Mardan	24.02.2011	24.02.2011	17	D/Selectee	GHSS Bakhsali 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	16.08.2010	16.08.2010	17	D/Selectee	GHSS Khora Di Khan	SO(S)3-2/2004/(Male) dated 15.08.2010(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 15.08.2010(Merit 01/2009)
368	Iqbal Sheer S/o Muhammad Shafoor Khan SS English	02.11.1981	Swat	24.02.2011	24.02.2011	17	D/Selectee	GHSS Chamtal 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	29.01.1982	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 Brees SS Biology	12.02.1972	Haripur	16.08.2010	16.08.2010	17	D/Selectee	GHSS Harma 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	01.11.2009	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/c 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/c Fateh Ranim SS Physics	25.01.1980	Mardan	25.02.2011	25.02.2011	17	D/Selectee	GHSS Sharki Holi Mardan	SO(S/M) E&SED/3-2/2011/ SS Physics(Male) dated 25.02.2011(Merit 01/2009)
375	Saleh Shah MA BEd	03.02.1951	Khyber Agency	05/03/1979	20/01/2010	17	By Promotion	HMAD Training NMD FATA Peshawar	SO(PE)2-6/E&SE/DPC Meeting/09: dated 20.01.2010
376	Habib ur Rehman BSc BEd	01.02.1962	FR Bannu	15/02/1984	27/03/2010	17	By Promotion	HM GHS Sarghar M.Khan FR Lakki Marwat	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
377	Aziz Ullah Khan BA BEd	08.04.1950	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	Sharif Gul BSc BEd	15.07.1960	Charsadda	01/10/1984	27/03/2010	17	By Promotion	HM GHS Surzai Payan Peshawar	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
380	Fard 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 Rodi Khel Di Khan	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
382	Abdur Rahim BSc BEd	01.01.1961	D.I.Khan	10/10/1985	27/03/2010	17	By Promotion	HM GHS Bazd 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 Kharghali Landi Kotal Khyber	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
385	Munammad Niaz BSc BEd	14.04.1954	Peshawar	22/03/1985	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 Saad BA BEd	15.04.1962	Bajaur Agency	02/12/1984	27/03/2010	17	By Promotion	HM GHS Khar No.2 Bajaur	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
387	Ali Muhammad BSc MEd	29.10.1962	Dir Lower	10/05/1985	27/03/2010	17	By Promotion	HM GHS Gul Mucam 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	26.03.1953	Charsadda	20/07/1985	27/03/2010	17	By Promotion	HM GHS Waraga 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 Tenkal 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 Korona Mardan	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
393	Hidayat ul Haq BSc BEd	06.04.1961	Charsadda	01/12/1986	27/03/2010	17	By Promotion	HM GHS Sati 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 Darpa 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 Sureti 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	13/05/1987	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	Sner Afzal Khan MA BEd	29.06.1960	Bannu	22/11/1982	27/03/2010	17	By Promotion	HM GHS Panar Khel Pacca Lakki	SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
402	Ikrumullah MA BEd	01.01.1961	Peshawar	01/01/1987	27/03/2010	17	By Promotion	HM GHS Larana 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	03.05.1952	Vanshera	30/04/1987	24.01/2011	17	By Promotion	HM GHS Dara Vanshera	SO(PE)2-6/E&SE/DPC Meeting/2011: dated 24.01.2011
407	Haq Nawaz MA BEd	01.04.1961	Abbottabad	09/11/1987	24.01/2011	17	By Promotion	HM GHS Panara Haripur	SO(PE)2-6/E&SE/DPC Meeting/2011: dated 24.01.2011
408	Ashiq Hussain BA BEd	25.09.1951	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 Tappa Gajoon Swabi	SO(PE)2-6/E&SE/DPC Meeting/2011: dated 24.01.2011

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	3463		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	15.11.1962	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 Total Maiakand	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	16.02.1998	12.02.2020	17	BY promotion	SS (Economics) BS-17 GHSS Kati Ghan 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	Monmand	21.11.2005	12.02.2020	17	BY promotion	SS (Physics) BS-17 GMHSS Paindi 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 Lali 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 Battaogram	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 Battaogram	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 Kambal 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 Gona 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 Battaogram	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 Snaif 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 Tall 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 Barket 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	25.01.1979	Peshawar	03.03.2012	12.02.2020	17	BY promotion	SS (Economics) BS-17 GHSS Narangri 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	ALTAH 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

AS A PART OF THE  
 ANNUAL REVIEW  
 OF THE  
 DEPARTMENT OF  
 EDUCATION  
 PESHAWAR  
 2020-21

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	17.09.2012	12.02.2020	17	BY promotion	SS (Maths) BS-17 GHSS Regl 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	3.3.1955	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 Lodni 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

16-91-

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

*E* *Zia*

*M. A. MAMAT ALI*  
 M. A. MAMAT ALI  
 ADVOCATE SUPREME COURT  
 PESHAWAR

# VAKALATNAMA

BEFORE THE KPK Service Tribunal Bench DERA ISMAIL KHAN

M. Rashid **VERSUS** Govt of KPK etc

TITLE @ Appeal

I/WE Appellant

The Above Named M. Rashid 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: \_\_\_\_\_

Accepted By:

*M. Anwar*

*M. Rashid* - - - *Appellant*

SIGNATURE OF EXECUTANT (S)

*[Signature]*

**MUHAMMAD ANWAR AWAN  
ADVOCATE SUPREME COURT  
03339962231**