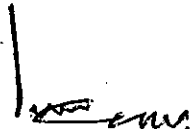


The appeal of Mr. Khalil Ahmad T.T at GMS Sher Ali District Tank received today i.e. on 13.07.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Addresses of respondent no. 4 to 16 are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Annexures of the appeal may be flagged.

No. 1652 /S.T,

Dt. 14-07 /2020.

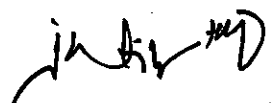

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Shiekh Iftikhar-ul-Haq Adv.
High Court Dera Ismail Khan.

Respected sir,

The objections No 192 had been removed. Hence resubmitted please sir.


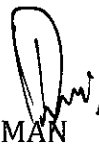
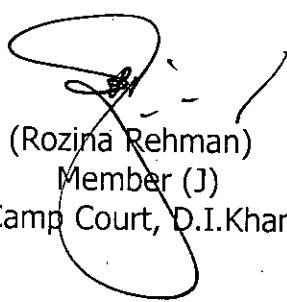
24.7.2020



Sh: Iftikhar ul-Haq

Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- 8643 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27/07/2020	<p>The appeal resubmitted today by post through Sheikh Iftikhar-ul-Haq Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	14.9.20	<p>This case is entrusted to touring S. Bench at D.I.Khan for preliminary hearing to be put up there on <u>24.9.20</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	24.09.2020	<p>Counsel for appellant present. Preliminary arguments heard. File perused.</p> <p>Points raised need consideration. Admitted to 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 respondents for written reply/comments. To come up for written reply/comments on 23.11.2020 before S.B at Camp Court, D.I.Khan.</p> <p style="text-align: right;"> (Rozina Rehman) Member (J) Camp Court, D.I.Khan</p>

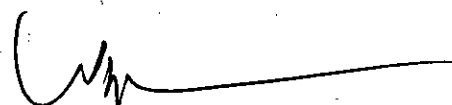
Appn. Deposited
Sec. Process Fee

31/9/20

23.11.2020

Counsel for appellant and Muhammad Jan, learned DDA alongwith Mehmood Azam ADO for official respondents No. 1 to 3 present.

Muhammad Alam Zeb Quershi, Advocate submitted Vakalat Nama in favor of private respondents No. 04 to 6, 8 to 12 & 14 to 16. Nemo for private respondents No.7 & 13.

Representative of official respondent No. 1 to 3 and counsel for private respondents No.04 to 6, 8 to 12 & 14 to 16 seeks time to file written reply/comments. Notice be issued to private respondent No. 7 & 13. Granted. To come up for written reply/comments on 23.12.2020 before S.B at Camp Court, D.I.Khan.



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

23.12.2020.

Due to Covid-19 case
is adjourned to 23.02.2021
for the same as before.



Reader.

23.02.2021

Junior to counsel for the appellant and Mr. Riaz Khan Paindakhel learned Asst. AG alongwith Mehmood Azam ADO for official respondent and counsel for private respondents present.

Written reply/comments on behalf of official respondents as well as private respondents not submitted. Representative of official respondents and counsel for private respondents requested for time to submit reply/comments. Granted. To come up for reply/comments on 26.05.2021 before S.B at Camp Court, D.I Khan.



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


Due to COVID-19 therefore the case is
adjourned. To come up for the same
on 29/9/21

QW
Reader

29.09.2021

Learned counsel for the appellant present. Mr. Mehmood Azam, ADO (Litigation) alongwith Mr. Usman Ghani, District Attorney for official respondents No. 1 to 3 present and sought time for submission of written reply/comments. Respondents are directed to furnish reply/comments within 10 days. In case the respondents failed to submit reply/comments within stipulated time from today, they shall have to seek extension of time through written application citing sufficient reasons. Otherwise, their right for submission of reply/comments shall stand ceased. To come up for arguments before the D.B on 25.11.2021 at Camp Court D.I.Khan.

Previous date was changed on Reader Note, therefore, notice be issued to private respondents as well as their counsel with the directions to furnish reply/comments as well as arguments for the date fixed.



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

25.11.2021

Counsel for the appellant and Mr. Noor Zaman Khattak, District Attorney, along with Mehmood Azam, ADEO for the respondents No. 1 to 4 present and submitted written reply/comments. Placed on file. Counsel for private respondents No. 4, 5, 6, 8, 9, 10, 11, 12, 14, 15 and 16 also present and submitted reply/comments which are placed on file. Fresh notices be issued to respondents No. 7 and 13 for submission of written reply/comments on next date as last chance. Case to come up on 25.01.2022 before S.B at camp court, D.I.Khan.

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



Chairman
Camp Court, D.I.Khan

25.01.2022

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


Reader.

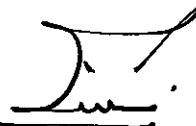
25.05.2022

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

Comments on behalf of private respondents No. 4, 5, 6, 8, 9, 10, 11, 12, 14, 15 and 16 as well as official respondents No. 1 to 3 have already been submitted, while reply/comments on behalf of private respondents No. 7 & 13 are still awaited.

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

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


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

25.07.2022

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


Reader

26th Sept 2022

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

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



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

25.10.2022

Appellant present through counsel.

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

File to come up alongwith connected Service Appeal No.8641/2020 titled "Manzoor Ahmad 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

(A)

BEFORE THE KPK SERVICES TRIBUNAL, PESHAWAR

In Service Appeal No. 8643/2020

Khalil Ahmad
(Appellant)

Versus

Govt Of KPK, etc
(Respondents)

INDEX

S.No.	Description of document	Annexure	Pages
1.	Service Appeal with affidavit	--	1-8
2.	Application for condonation of delay with affidavit	--	-9-
3.	Copy appointment order	A	-10-
4.	Copy of the impugned seniority list	B	11-12
5.	Copy of application	B/1	-13-
6.	Copy of seniority list dated 01/01/202	C	14-17
7.	Copy of the departmental appeal along with correspondence	D	18-19
8.	Wakalatnama	--	-20-

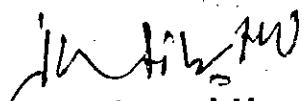
Dated 8/07/2020

Your humble appellant,



Khalil Ahmad

Through counsel:-



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

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2020

Khalil Ahmad son of Ghulam Muhammad r/o village Amakhel, Tehsil & District Tank. Presently serving as Theology teacher at Govt. Middle School Sher Ali, District Tank. Cell#0312-9012434, 0345-3491922

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

VERSUS

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

12

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

..... (RESPONDENTS)

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

PRAYER

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

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action/order of the appellate authority over the departmental appeal of the appellant.

Respected Sir,

Appellant humbly submits as under;

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

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to requisite the whole record in respect of seniority including appointment orders of private respondents. Copy of application is annexed as **Annexure-B/1**.

4. That thereafter the official respondents issued the seniority list on 01/01/2020 on the basis of merit position and appellant was placed on the correct place/serial number. Copy of the seniority list dated 01/01/2020 is annexed as **Annexure-C**.
5. That thereafter when the appellant came into knowledge of the aforementioned incorrect seniority list, the appellant being aggrieved submitted a departmental appeal dated 31/12/2019 through proper channel which was further proceeded by the official respondents on mentioned date 24/02/2020. The official respondents not decided the departmental appeal of the appellant and similarly did not bother to reply the same rather due to COVID-19. Copy of the department appeal along with correspondence thereon is jointly annexed as **Annexure-D**.
6. That appellant feeling aggrieved by the impugned act and omissions as well as impugned seniority list, hence, the instant appeal on the following grounds.

GROUND

- a. Because as per policy, appellant is entitled for seniority because the appellant was appointed on open merit and his merit position is higher than the private respondents and the official respondents are duty bound to revisit/correct the seniority list.
- b. Because the valuable rights have been accrued to the appellant the same cannot be snatched because the right of appellant is fully accrued as evident from the fresh seniority list of 2020.
- c. Because neither the competent authority nor the departmental promotion committee can cross the parameters of service policy and service laws.

(S)

- d. Because the seniority is the right of appellant which has been withheld by the official respondent for no good reasons.
- e. That this honourable Tribunal has got vast and ample powers to entertain the instant appeal.
- f. That counsel for the appellant may graciously be allowed to raise additional grounds at the time of arguments.

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

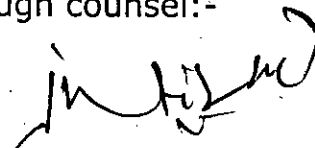
Dated 8/07/2020

Your humble appellant,



Khalil Ahmad

Through counsel:-



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

(b)

BEFORE THE KPK SERVICES TRIBUNAL, PESHAWAR

In Service Appeal No. _____/2020

Khalil Ahmad
(Appellant)

Versus

Govt Of KPK, etc
(Respondents)

AFFIDAVIT

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

Dated 8/07/2020

Identified by
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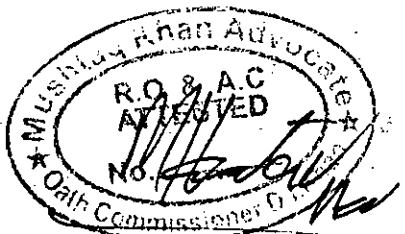
[Signature]
Deponent

VERIFICATION

Verified on oath at DIKhan, this 8th day of July 2020, that all contents of the above appeal are true and correct.

Dated 8/07/2020

[Signature]
Appellant



8-7-2020

7

BEFORE THE KPK SERVICES TRIBUNAL, PESHAWAR

In Service Appeal No. _____/2020

Khalil Ahmad
(Appellant)

Versus

Govt Of KPK, etc
(Respondents)

ADDRESSES OF PARTIES

Khalil Ahmad son of Ghulam Muhammad r/o village Amakhel, Tehsil & District Tank. Presently serving as Theology teacher at Govt. Middle School Sher Ali, District Tank. Cell#0312-9012434, 0345-3491922

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

VERSUS

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

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

..... **(RESPONDENTS)**

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A

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

CM Petition _____/2020

In Service Appeal No. _____/2020

Khalil Ahmad **VERSUS** GOVT of KPK etc

APPLICATION FOR CONDONATION OF DELAY

Respected Sir,

Appellant humbly submits as under:-

1. That the above mentioned service appeal is being filed before this honourable tribunal, the contents of which may please be considered as integral part of this application.
2. That in the attending circumstances the service appeal of the appellant is well within time because of COVID-19 and lockdown and closure of this honourable Tribunal, the appellant was unable to file the instant appeal.
3. That this honourable Tribunal has got vast and ample powers and competent jurisdiction to accept the instant application

It is therefore humbly requested that on acceptance of the instant application the condonation of delay may be granted to the petitioner.

Dated: 08/07/2020

Khalil Ahmad

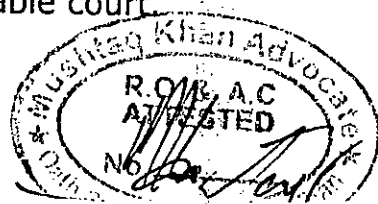
Yours Humble

Khalil Ahmad

AFFIDAVIT

I, **Khalil Ahmad**, the appellant, do hereby solemnly affirm and declare on oath that the contents of the application are true and correct to the best of my knowledge and belief and that nothing has been deliberately concealed from this honorable court.

Identified by
Khalil Ahmad



Khalil Ahmad

DEPONENT

(11)

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) TANK

General Seniority List of TT Teachers (Male)

S.No	Name of Teacher	Acad:	Prof:	BPS	Father, s Name	Date of Birth	Domicile	Date of 1st entry in Govt. Service	Date of Apptt: in the present post	Place of Posting	Remarks
1	Sultan Mahmood		S/Yafa	15	Noor Muhammad	01/04/1953	Tank	02/02/1983	02/02/1983	GHS Kot Hakeem	
2	Khan Muhammad	F.A	S/Yafa	15	Kajal Khan	12/05/1956	Tank	5/12/1974	04/05/1983	GHS Tajori	
3	Abdul Aziz		Sh.Almia	15	Ghulam Muhammad	28/10/1955	Tank	23/10/1983	23/10/1983	GVS Chadrar	
4	Imam Baksh	BA	S/Yafa	15	Ghulam Sarwar	01/02/1957	Tank	05/12/1985	05/12/1985	GMS Tator	
5	Jan Baz Khan	SSC	Sh.Almia	15	Torah Baz	24/12/1954	Tank	17/12/1980	09/12/1985	GHS Gara Budha	Promoted to B-16 & Retired
6	Muhammad Bashir	Arbi Hon:	S/Yafa	15	Muhammad Ayub	15/01/1959	Tank	07/12/1986	07/12/1986	GHS Daraki	
7	Jan Khan		S/Yafa	15	Bed Shah Khan	15/09/1960	Tank	15/10/1987	15/10/1987	GHS Gara Baloch	
8	Habib Ur Rehman	SSC	Sh.Almia	15	Sahib Noor	10/04/1959	Tank	22/10/1987	22/10/1987	GMS Sher Ali	Promoted to B-15
9	Ahmad Khan	SSC	S/Yafa	15	Khan Zaman	10/04/1970	Tank	25/10/1989	25/10/1989	GHS Gara Shahbaz	
10	Nawab Khan	S/Yafa	TT	15	Khweja Muhammad	15/09/1965	Tank	20/12/1989	20/12/1989	GCVHS No.1 Tank	
11	Ghulam Farooq	MA	S/Yafa	15	Ahmad Khan	03/01/1963	Tank	22/11/1992	22/11/1992	GHS M.Akbar	Promoted to B-16
12	Abdul Majeed	SSC	Sh.Almia	15	Dil Afza	19/04/1973	Tank	01/09/1994	01/09/1994	GVS Wanda zalo	Promoted to B-16
13	Hayat Ullah		Sh.Almia	15	Habib Ullah	12/04/1967	Tank	08/09/1994	08/09/1994	GHS No.2 Tank	
14	Muhammad Yousaf	Middle	Sh.Almia	15	Muhammad Sadio	10/09/1967	Tank	22/11/1994	22/11/1994	GMS Mamraiz Pathan	
15	Noor ul Amin	SSC	S/Yafa	15	Ghazi Marjan	10/09/1967	Tank	05/10/1993	05/10/1993	GHS Umar Khel	
16	Muhammad Khalid	BA	Sh.Almia	15	Bahadar sher Khan	01/10/1970	Tank	06/04/1999	05/04/1999	GHS Amakhel	Promoted to B-15
17	Muhammad Amin	SSC	S/Yafa	15	Ghazi Khan	03/03/1974	Tank	06/04/1999	06/04/1999	GMS Adda Umar	
18	Abdul Wadood	BA	Sh.Almia	15	Wali Khan	01/04/1975	Tank	06/04/1999	05/04/1999	GVS Manjhi	Promoted to B-16
19	Shabir Ahmad	SSC	S/Yafa	15	Ghulam Rabani	25/12/1975	Tank	06/04/1999	05/04/1999	GVS K.Khadak	Promoted to B-16
20	Abdur Rauf	BA	S/Yafa	15	Ghulam Saeed	02/02/1978	Tank	08/04/1999	08/04/1999	GMS Kot Allah Dad	
21	Hayat Muhammad	SSC	S/Yafa	15	Noor Muhammad	21/02/1958	Tank	27/10/1975	01/01/1999	GVS Hayat Khan	
22	Nazeeb Ullah	BA	S/Yafa	15	Zafar Khan	02/03/1974	Tank	20/12/1999	20/12/1999	GHS Pai	
23	Muhammad Mushlag	MA	S/Yafa	15	Ahmad Baksh	08/01/1978	Tank	21/12/1999	21/12/1999	GHS Ranwal	Promoted to B-16
24	Nazmat Ullah	SSC	S/Yafa	15	Sead Ullah	01/03/1981	Tank	21/12/1999	21/12/1999	GHS Kaka khel	
25	Fazal Karim	FA	S/Yafa	15	Fateh Khan	02/03/1987	Tank	22/12/1999	22/12/1999	GVS Kot Musa	
26	Abdul Hamaed	FA	S/Yafa	15	Ranmat Ullah	03/03/1974	Tank	22/12/1999	22/12/1999	GVS Naurang	
27	Muhammad Khalid	BA	S/Yafa	15	Inayat Ullah Khan	14/08/1970	Tank	23/12/1999	23/12/1999	GVS Wanda zalo	
28	Muhammad Khalid	MA	Sh.Almia	15	Muhammad Magsood	05/05/1975	Tank	23/12/1999	23/12/1999	GHS Gul Imam	Promoted to SST
29	Muhammad Ilyas	SSC	Sh.Almia	15	Khursid Ahmed	08/10/1977	Tank	23/12/1999	23/12/1999	GVS Kot Azam	
30	Hizoullan	SSC	S/Yafa	15	Shah Banram	19/01/1978	Tank	23/12/1999	23/12/1999	GVS Sheikh Sultan	
31	Hamid Ullah	SSC	S/Yafa	15	Muhammad Khan	06/03/1980	Tank	23/12/1999	23/12/1999	GVS Kot Ka:	

Attested to be
true copy
(Signature)

Ann - B

S.No	Name of Teacher	Acad:	Prof:	SPS	Father's Name	Date of Birth	Domicile	Date of 1st entry in Govt. Service	Date of Apptt. in the present post	Place of Posting	Remarks
32	Khan Banoor	SSC	S/Yafia	15	Fida Muhammad	11/01/1975	Tank	24/12/1999	24/12/1999	GVS Norang	
33	Fiaz Ullah	SSC	Sh.Aimia	15	Abdul Haq	09/02/1975	Tank	01/09/2007	01/09/2007	GVS Nasran	Promoted to B-16
34	M. Tanvir Shah	SSC	Sh.Aima	15	Muhammad Khan	21/02/1975	Tank	01/09/2007	01/09/2007	GVS Nasran	Promoted to B-16
35	Azmat Khan	BA	Sh.Aima	15	Hassan Khan	09-04-1997	Tank	24/05/1995	01/09/2007	GCVHS No. 1 Tank	Promoted to SST
36	Shafiq Ud Din	MA	Sh.Aimia	15	Abdul Aziz	10/05/1975	Tank	01/09/2007	01/09/2007	GHS Umer Kher	Promoted to B-16
37	Hameed Ullah	BA	S/Yafia	15	Aman Ullah	09/09/1972	Tank	01/09/2007	01/09/2007	GHS Akbar	Promoted to B-16
38	Misraah Ud Din	FA	Sh.Aimia	15	Wali Muhammad	20/05/1975	Tank	01/09/2007	01/09/2007	GHS No. 3 Tank	Promoted to B-16
39	Muhammad Usamah	SSC	S/Yafia	15	Yar Muhammad	01/01/1979	Tank	01/09/2007	01/09/2007	GHS K. Warwal	Promoted to B-16
40	Muhammad Gulzar	SSC	Sh.Aimia	15	Muhammad Jan	25/01/1981	Tank	01/09/2007	01/09/2007	GMS Barakhet	Promoted to B-16
41	Muhammad Tanvir	SSC	Sh.Aimia	15	Haibat Khan	11/02/1981	Tank	01/09/2007	01/09/2007	GMS Abizer	Promoted to B-16
42	Momin Khan	FA	Sh.Aimia	15	Walay Khan	16/02/1981	Tank	01/09/2007	01/09/2007	GMS Jabara	Promoted to B-16
43	Usaid Anwar	SSC	S/Yafia	15	Muhammad Ibrahim	05/05/1982	Tank	01/09/2007	01/09/2007	GHS Nandoor	Promoted to B-16
44	Inam Ullah	BA	Sh.Aimia	15	Anna Ullah	01/03/1983	Tank	01/09/2007	01/09/2007	GHS Toran Nau	Promoted to B-16
45	Khan Bad Shah	FA	S/Yafia	15	Muhammad Aslam	14/04/1984	Tank	01/09/2007	01/09/2007	GVS Nasran	Promoted to B-16
46	Muhammad Zakia	VA	S/Yafia	15	Shahid Ullah	05/07/1984	Tank	01/09/2007	01/09/2007	GMS Nasran	
47	Khan Ahmad	SSC	Sh.Aimia	15	Ghulam Muhammad	11/01/1984	Tank	01/09/2007	01/09/2007	GMS Eher A1	
48	Muhammad Usman	FA	Almia	15	Zahid Gul	29/03/1985	Tank	01/09/2007	01/09/2007	GHS Bezal	
49	Muhammad Usman	SSC	Sh.Aimia	15	Aman Ullah	09/04/1985	Tank	01/09/2007	01/09/2007	GVS Reghza	
50	Muhammad Usman	BA	S/Yafia	15	Outab Khan	05/08/1985	Tank	01/09/2007	01/09/2007	GHS Sheikh Umar	
51	Manzoor Ahmad	FA	Sh.Aimia	15	Ghulam Muhammad	13/12/1985	Tank	01/09/2007	01/09/2007	GHS Maghzal	
52	Aziz ur Rehman	SSC	Sh.Aimia	15	Abdul Sattar	21/03/1987	Tank	01/10/2007	01/10/2007	GHS Khatkhat	
53	Safiq Rehman	VA	Sh.Aimia	15	Obaid Ullah Jan	29/04/1992	Tank	04/12/2012	04/12/2012	GHS Maghza	
54	Muhammad Anwar	VA	Sh.Aimia	15	M. Aslam Khan	02/02/1995	Tank	04/12/2012	04/12/2012	GVS Khat Nawaz	
55	Naseeb Ullah	VA	Sh.Aimia	15	Safiq Ahmad	14/03/1995	Tank	04/12/2012	04/12/2012	GMS Chesani Kher	
56	Wahed Ullah Khan	VA	Sh.Aimia	15	Muhammad Azam Khan	14/05/1995	Tank	04/12/2012	04/12/2012	GMS Khat Mulla	
57	Osma Khan	BA	Sh.Aimia	15	Ramzan	15/03/1990	Tank	04/12/2012	04/12/2012		

Attested to be true copy
 (K) *[Signature]*

Aman Ullah Super
 O/O DEO (V) Tank

Attested to be true copy

District Education Officer (M)
 Tank

Ann-B/2

DA TT

بکھورالورجناب ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) ضلع ٹانک
عنوان :- درخواست بھراد 2013 R.T.I کے تحت ریکارڈ کی طلبی!

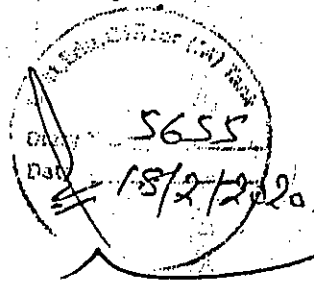
جناب عالی!
موادبانہ گزارش ہے کہ ہمیں 11-07-2007 کو بطور اسلامیات ٹیچر بھرتی ہونے والے مدرسہ ذیل اساتذہ کرام کے First order copies کی فوٹو کاپیاں

Right To information Act: 2013 کے تحت درکار ہیں۔

- 1۔ مسباح الدین - (T.T)
- 2۔ مومن خان - (T.T)
- 3۔ حضرت اللہ - (T.T)
- 4۔ خان بادشاہ - (T.T)
- 5۔ محمد طاہر - (T.T)
- 6۔ حمید اللہ - (T.T)
- 7۔ محمد طاہر شاہ - (T.T)
- 8۔ محمد اسماعیل - (T.T)
- 9۔ عمید اللور - (T.T)
- 10۔ انعام اللہ - (T.T)
- 11۔ شفیع اللہ - (T.T)
- 12۔ محمد گلزار - (T.T)
- 13۔ عظمت خان - (T.T)

آپ صاحبان سے استدعا ہے کہ مدرسہ بالا اساتذہ کرام کی آرڈر کاپیاں فراہم کرنے کا حکم صادر فرمائیں۔

عین نواز مس ہوتی
مدرسہ 17-02-2020



- سائلان :- خلیل احمد (T.T) GMS شہر علی ٹانک - 03453491922
- محمد عیسیٰ (T.T) GMS Tanc کینٹ - 03439292620
- منظور احمد (T.T) GMS انڈی ٹانک - 03449870812

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Knecht #

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

S.No	Name of Teacher	Father, s Name	Acad:	Prof:	BA/BSc Divl.	Place of Posting	BPS	Date of Birth	Date of 1st entry in to Govt. Service	D/O Taking Over charge of in the Present Post	Date of Regularizati on Present post	Remarks
1	Ahmad Khan	Khan Zaman	SSC	S/Yafta		GHS Gara Shihbaz	15	10-04-1970	25-10-1999	25-10-1999	25-10-1999	
2	Muhammad Yousaf	Muhammad Sadiq	Middle	Sh'Almia		GMS Mamraiz Pathan	15	12-04-1967	22-11-1994	22-11-1994	22-11-1994	
3	Noor ul Amin	Ghazi Marjan	SSC	S/Yafta		GMS Chesan kach	15	10-09-1967	05-10-1993	05-04-1999	05-04-1999	
4	Abdur Rauf	Ghulam Saeed	BA	S/Yafta		GMS Lakki Michan Khel	15	02-02-1978	08-04-1999	08-04-1999	08-04-1999	
5	Nasim Ullah	Saad Ullah	FA	S/Yafta		GHS Chagrar	15	01-05-1981	21/12/1999	21/12/1999	21/12/1999	
6	Fazal Karim	Fateh Khan	BA	S/Yafta	2nd Divl	GMS Sabir Shah	15	02-03-1967	22-12-1999	22-12-1999	22-12-1999	
7	Bait Ullah	Rahmat Ullah	FA	S/Yafta		GMS Naurang	15	03-03-1974	22-12-1999	22-12-1999	22-12-1999	
8	Hizbullah	Shah Bahram	SSC	S/Yafta		GMS Sheikh Sultan	15	16-01-1978	23-12-1999	23-12-1999	23-12-1999	
9	Muhammad Ilyas	Khurshid Ahmad	SSC	Sh'Almia		GMS Kot Azam	15	08-10-1977	23-12-1999	23-12-1999	23-12-1999	
10	Hamid Ullah	Muhammad Khan	SSC	S/Yafta		GMS Hayal Kcuma	15	05-03-1980	23-12-1999	23-12-1999	23-12-1999	
11	Khan Bahadar	Fida Muhammad	SSC	S/Yafta		GMS cheena	15	01-07-1975	24-12-1999	24-12-1999	24-12-1999	
12	Khalil Ahmad	Ghulam-Muhammad	SSC	Sh'Almia		GMS Sher Ali	15	11-10-1984	01-09-2007	01-09-2007	01-09-2007	
13	Muhammad Ilyas	Outab Khan	BA	S/Yafta		GMS Nandoor	15	08-08-1985	01-09-2007	01-09-2007	01-09-2007	
14	Muhammad Zakria	Sharif-ud Din	MA	S/Yafta		GMS Shah Alam	15	26-03-1985	01-09-2007	01-09-2007	01-09-2007	
15	Muhammad Esa	Zahid Gul	MA	Sh'Almia B.Ed		GMS Tank cant	15	13-12-1986	01-09-2007	01-09-2007	01-09-2007	
16	Manzoor Ahmad	Ghulam Muhammad	FA	Sh'Almia		GMS Andri	15	09-04-1985	01-09-2007	01-09-2007	01-09-2007	
17	Muhammad Qasim	Aman Ullah	SSC	Sh'Almia		GMS Manjhee	15	23-03-1987	01-10-2007	01-10-2007	01-10-2007	
18	Aziz ur Rehman	Abdul Sattar	SSC	Sh'Almia	2nd Divl	GHS Sheikh Udar	15	02-02-1955	04-12-2012	04-12-2012	04-12-2012	
19	Muhammad Anwar	M. Aslam Khan	MA	Sh'Almia		GMS Kot Kal	15	14-05-1955	04-12-2012	04-12-2012	04-12-2012	
20	Waheed Ullah Khan	Muhammad Azam Khan	MA	Sh'Almia		GMS Chesan kach	15	15-03-1990	04-12-2012	04-12-2012	04-12-2012	
21	Oismal khan	Ramzan	MA M.Phil	Sh'Almia M.Ed		GMS Kot Allah dad	15	29-04-1982	04-12-2012	04-12-2012	04-12-2012	
22	Saif ur Rehman	Obaid Ullah Jan	MA	Sh'Almia		GHS Nasran	15	14-03-1985	04-12-2012	04-12-2012	04-12-2012	
23	Najeeb Ullah	Said Ahmad	MA	Sh'Almia		GMS Abcar	15	20-01-1958	04-01-2015	04-01-2015	09-03-2018	
24	Asghar Ali	Muzaffar Khan	BA	Sh'Almia		GHS Dabara	15	13-05-1978	04-01-2015	04-01-2015	09-03-2018	
25	Rizwan	Ghulam Ali		Sh'Almia		GHS Gara Budah	15	01-05-1984	04-01-2015	04-01-2015	09-03-2018	
26	Farman Ali	Rehmat Ali	MA(Isl) Arbi	B.Ed	1st Divl	GMS Wandazo	15	05-05-1986	28-02-2016	28-02-2016	09-03-2018	
27	Latif Ullah	Pir Khan	MA	Sh'Almia		GHS Waroki	15					

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15

28	Yasir Ali	Ali Nasar Malik	MA	Sh/Almia									
29	Ghulam Ullah	Ghulam Rasool	BA	Sh Almia		GHS Gara baloch	15	17-04-1990	25-02-2016	29-02-2016	09-03-2018		
30	Habib Ur Rehman	Abdul Qadeer	MSc (Math)	S/Yafta M.Ed	1st Divi:	GMS Kot Nawaz	15	07-04-1989	21-03-2017	21-03-2017	09-03-2018		
	Fazal Rehman	Abass Khan	MA Isl:			GSSNCMHS No.1 Tank	15	13-04-1989	21-03-2017	21-03-2017	09-03-2018		
	Muhammad Nawaz	Gul Nawaz	MA Isl:		2nd Divi	GHS Tator	15	10-03-1991	01-01-2019	01-01-2019	N/R	Contract Employee	
	Muhammad Adnan	Abdul Saleem	MA		2nd Divi	GMS Murtaza	15	12-04-1984	01-01-2019	01-01-2019	N/R	Contract Employee	
	Dilawar Khan	Muhammad Jan	MA Isl:	B.Ed	2nd Divi	GMS Lakki Michan Khel	15	12-09-1984	01-01-2019	01-01-2019	N/R	Contract Employee	
					2nd Divi	GHS Kirri Hiadar	15	10-01-1991	04-10-2019	04-10-2019	N/R	Contract Employee	

Chairman
 Muhammad Salim Principal
 GSSNCMHS No.1 Tank

Signature
 09/11/19

V/Chairman
 Gohar Zaman Principal
 GHS Gara Baloch

Signature
 Member
 Rehmat Ullah Headmaster
 GHS Kaka Khel

Signature
 O/Assistant
 Ahmad Nawaz S/Clerk

Signature
 District Education Officer (M)
 Tank

Endst No. 8363-63

Dated Tank the 01/01/2020

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

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Signature

Signature
 District Education Officer (M)
 Tank

Page 1

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) TANK

(16)

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

S.No	Name of Teacher	Father, s Name	Acad:	Prof:	BA/BSc Divi:	Place of Posting	BPS	Date of Birth	Date of 1st entry in Govt Service	Date of Appnt: in the present post	Date of Appnt: in the present Grade	Remarks
1	Ghulam Farooq	Ahmad khan	MA	S/Yafta		GHS M.Akbar	16	03-01-1953	22/11/1992	22/11/1992	21-02-2013	
2	Abdul Majeed	Dil Afza	SSC	Sh:Almia		GSSNCHS No.1.Tank	16	19-04-1958	01-09-1994	01-09-1994	21-02-2013	
3	Shabir Ahmad	Ghulam Rabani	SSC	S/Yafta		GHS K.Khadak	16	25-12-1975	06-04-1999	06-04-1999	21-02-2013	
4	Muhammad Mushtaq	Ahmad Bakhsh	MA	S/Yafta		GHS Gara Shahbaz	16	08-01-1978	21-12-1999	21-12-1999	30-05-2013	
5	Muhammad Gulzar	Muhammad Jan	SSC	Sh:Almia		GHS Ranwal	16	26-01-1951	01-09-2007	01-09-2007	30-05-2013	
6	Shafi Ud Din	Abdul Azim	MA	Sh:Almia		GHS Umer Khel	16	10-09-1976	01-09-2007	01-09-2007	30-05-2013	
7	Misbah Ud Din	Wali Muhammad	FA	Sh:Almia		GHS Ama Khel	16	20-09-1978	01-09-2007	01-09-2007	30-05-2013	
8	Momin Khan	Malay khan	FA	Sh:Almia		GHSS Gui Imam	16	16-02-1981	01-09-2007	01-09-2007	30-05-2013	
9	Firrat Ullah	Abdul Haq	SSC	Sh:Almia		GHSS Mullazai	16	09-02-1975	01-09-2007	01-09-2007	30-05-2013	
10	Muhammad Tahir	Haibat khan	BA	Sh:Almia	1st Divi	GHS No 3 Tank	16	01-02-1981	01-09-2007	01-09-2007	28-05-2013	
11	M. Tahir Shah	Muhammad Khan	SSC	Sh:Alia		GHS Daraki	16	12-02-1976	01-09-2007	01-09-2007	30-05-2013	
12	Haris Ullah	Aman Ullah	BA B Ed	Sh:Alia B.Ed	2nd Divi	GHS Akbari	16	05-09-1978	01-09-2007	01-09-2007	30-05-2013	
13	Muhammad Ismail	Yar Muhammad	SSC	S/Yafta		GHS K Marwali	16	01-01-1979	01-09-2007	01-09-2007	30-05-2013	
14	Ubaid Anwar	Muhammad Ibrahim	SSC	S/Yafta		GHS No.3 Tank	16	05-05-1982	01-09-2007	01-09-2007	18-11-2014	
15	Inam Ullah	Alla Ullah	BA	Sh:Almia		GHS Teran Nau	16	01-03-1983	01-09-2007	01-09-2007	15-11-2014	
16	Nayat Ullah	Habib Ullah	SSC	Sh:Almia		GHS No 2 Tank	16	15-04-1973	08-09-1994	08-09-1994	05-02-2017	

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[Signature]

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

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

Chairman
 Muhammad Salim Principal
 GSSNCMHS No.1 Tank

V/Chairman
 Gohar Zaman Principal
 GHS Gara Baloch

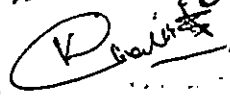
Member
 Rehmat Ullah Headmaster
 GHS Kaka Khel


D/Assistant
 Ahmad Nawaz S/Clerk

Endst No. 8361-62

Dated Tank the 01/01/2020

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

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 true copy.



 District Education Officer (M)
 Tank

118

The Director Elementary & Secondary Education
Pakhtunkhwa, Peshawar
Through
District Education Officer (M)
Elementary & Secondary Education
District Tank

Ann - D

Subject : Appeal for Correction in the Seniority List of TT and Senior TT since 2013

Respected Sir,

Memo:

With great respect it is brought into your kind notice that we (Khalil Ahmad, Muhammad Essa and Manzoor Ahmad) were appointed as TT on 01-09-2007 in Elementary & Secondary Education District Tank. We were lying on top of the list while thirteen(13) TTs were lying comparatively on lower Merit Order in the Appointment Order of TT on 01-09-2007. They were promoted to Senior TTs(BPS-16) in 2013, 2014, 2017 and 2019 on the basis of age and not on the order of merit which is against the Khyber Pakhtunkhwa Civil Servants Rules 1989.

Now we humbly request you to issue orders regarding correction in the Seniority lists of TT and Senior TT according to the Provincial Government Service Rules .

We also humbly request you to kindly issue orders giving us rights of the Senior TTs since 2013 so that we can be compensated.


A question may arise here that why did we not file an appeal against this seniority list? This was because of our unawareness and the then DEO office wrong explanation of the Service Rules. We came to know about the seniority rules that seniority should be awarded on Merit Order and not on Age basis when the latest seniority lists of different cadres were updated under the chairmanship of The Principal GSSNCMHS No1 Tank on 31-10-2019 and uploaded on the official WhatsApp Group of DEO(M) Tank.


Thank you.


Dated: 31-12-2019.

Yours obediently

Attested to be
true copy.
K. Ahmad

 Khalil Ahmad TT
GMS Sher Ali Distt Tank
CNIC No:12201-7784200-5
Contact No:0345-3491922

 Muhammad Essa TT
GMS Cantt Tank
CNIC:12201-5336981-5
Contact No:0343-9292620

 Manzoor Ahmad TT
GMS Andari Distt Tank
CNIC No:12201-5033378-7
Contact No:0344-9870812

19

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

NO. 9479
Dated Tank the 21/02/2020

To,


The Director,
E&S Education Khyber Pakhtunkhwa
Peshawar

Subject: Appeal for Correction in seniority list of TT and Senior TT

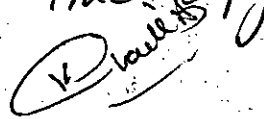
Memo:

Reference enclosed seniority appeal in r/o the following Teachers along with enclosures is submitted to your kind consideration and necessary action.

1. Khalil Ahmao TT GMS Sher Ali
2. Muhammad Essa TT GMS Tank Cantt
3. Manzoor Ahmad TT GMS Andari


District Education Officer(M)
Tank.

1211 - 9479
24-20-2020 24-20-2020

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وکالت نامہ

کورٹ
فیس

اجدات حاب جسر سختو خواہ سروس ٹریڈنگ نامہ

مخبر خلیل احمد بنام قورٹنٹ آف K.P.K
سروس ایبل

دعوی یا جرم U/s 4 K.P.K S.T. ACT 1974
تفصیل دعوی یا جرم

باعث تحریر آنکہ

مقدمہ معروضہ باللشکران میں انجمن عرفہ واسطے بروکری اور تجارتی کاروبار کے لئے قائم ہوئی ہے۔

مقدمہ معروضہ کے تحت ایک دفعہ پیش کی گئی ہے کہ میں پیش پر خود یا ذرا بڑی رو برو عدالت حاضر ہوتا ہوں گا اور ہر وقت پکارے جائے مقدمہ مکمل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیش پر منظر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز دیکل صاحب موصوف صدر مقام کچہری کے علاوہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بروکری کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر کچہری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا کچہری کے اوقات کے آگے یا پیچھے پیش ہونے پر منظر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا اجنت نہ واجب کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔

مقدمہ معروضہ کے تحت ایک دفعہ پیش کی گئی ہے کہ میں پیش پر خود یا ذرا بڑی رو برو عدالت حاضر ہوتا ہوں گا اور ہر وقت پکارے جائے مقدمہ مکمل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیش پر منظر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز دیکل صاحب موصوف صدر مقام کچہری کے علاوہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بروکری کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر کچہری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا کچہری کے اوقات کے آگے یا پیچھے پیش ہونے پر منظر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا اجنت نہ واجب کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔

مقدمہ معروضہ کے تحت ایک دفعہ پیش کی گئی ہے کہ میں پیش پر خود یا ذرا بڑی رو برو عدالت حاضر ہوتا ہوں گا اور ہر وقت پکارے جائے مقدمہ مکمل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیش پر منظر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز دیکل صاحب موصوف صدر مقام کچہری کے علاوہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بروکری کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر کچہری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا کچہری کے اوقات کے آگے یا پیچھے پیش ہونے پر منظر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا اجنت نہ واجب کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔

لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے
مورخہ 8 جولائی 2020

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

Accepted by
Sh. Iftikhar-ul-Haq Adv

122-7784200-5
0312-9012434

"B"

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

No.

Appeal No.....8642..... of 2020.

.....Muhammad ESSA.....Appellant/Petitioner

Versus

.....Through Secretary ESE Peshawar.....Respondent

Respondent No.....14.....

Notice to: — Schafiullah Senior Theology Teacher Clo DEO (Male) Tank
S/o Asdad Azeem, Vill Umerkhel P/o Malazai, Teh & Dist
Tank

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....25-11-2021.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this.....3rd.....

Day of.....November.....2021.

AT Camp
 Court Dikhan

E. Khan

Registrar,

Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

“B”

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

No.

Appeal No..... 8642 of 20 20
 Muhammad ESSR
Appellant/Petitioner

Versus
 Through Secretary ESSE Peshawar
Respondent

Respondent No..... 14

Notice to: — Sd. Abdullah Senior Theology Teacher (I/O DEO (Male) Tank
 S/O Asad Azeem, Vill Umerkhoif P/O Madasa, Teh & Dist
 Tank

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on..... 25-11-2021at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this..... 3/11

Day of..... 25/11/202120 21

At my
 Court Dikhan

Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

"B"

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

No.

Appeal No. 8642 of 2020.

Muhammad Essa Appellant/Petitioner

Versus

Through Secretary E.S.E. Peshawar Respondent

Respondent No. 15

Notice to: — Muhammad Gulzar Senior Theology Teacher C/O DEO (Male)
Tank S/o Muhammad Jan Mohapat Waman Vll Karo Khan Teh
E Dist Tank

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....25-11-2021.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this.....3rd.....

Day of.....November.....20

A+ Camp
Court
D. Khan

E. Khan

Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Appeal No.....5612..... of 2023.

.....ESSA..... Appellant/Petitioner.

Versus

.....Secretary E.S.S.E. Peshawar..... Respondent

Respondent No.....15.....

Notice to: — Muhammad Gulzar Senior Theology Teacher C/O DEO (Male)
Tank S/o Muhammad Jan Mohapat Waryan Jil Karo Khan Teh
& Dist Tank

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....25-11-2023.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this.....
Day of.....20 ..

M. Khan
2023
D. Khan

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

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

"B"

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

No.

Appeal No..... 8642 of 2020.

..... Muhammad Essa Appellant/Petitioner

Versus

..... Through Secretary E & SE Peshawar Respondent

Respondent No.....

Notice to: — Azmat Khan Senior Theology Teacher C/o DEO (male) Tank
 S/o Hussain Khan Villa Shah Alam Teh & Dist Tank.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on..... 25-11-2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this..... 3rd.....

Day of..... November 2021.

At Camp
 Court D. I. Khan

E. Khan

Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

“B”

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

No.

Appeal No..... 8542..... of 20 20

..... Appellant/Petitioner

Versus

..... Respondent

Respondent No.....

Notice to: — Azmat Khan Senior Theology Teacher (to DEO (male) Tank
S/o Husain Khan Vill. Shikham Tam & Dist Tank.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on..... 25-11-2021..... at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this... 3rd.....
Day of..... November..... 2021 ..

At Camp
Wazir D. Khan

E. Khan

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Appeal No. 8642 of 2020.

Muhammad Essa Appellant/Petitioner

Versus

Through Secretary E & SE Peshawar Respondent

Respondent No. 6

Notice to: — Fitratullah Senior Theology Teacher C/O DEO (Male) Tank. S/O
Abdul Haq vill S/O Mulazai Tehsil & Dist Tank

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 25-11-2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this 3rd

Day of November 20

At Camp
Court D.I. Khan

Fidhan

Registrar,
Khyber Pakhtunkhwa Service T
Peshawar.

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

"B"

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

No.

Appeal No.....3642..... of 20

.....Muhammad Essa.....Appellant/Petitioner

Versus

Through.....Secretary.....Peshawar.....Respondent

Respondent No.....6.....

Notice to: — Ftatullah Senior Theology Teacher (10 DEO (male) Tank, S/O
Abdul Haq Vill 5 P/O Mulazai Tank & Dist Tank

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

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

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

Day of.....November.....20

At camp
Court D. Khan

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Appeal No. 8642 of 2021.

Muhammed Essa Appellant/Petitioner

Versus

Through Secretary E.E.S.E. Peshawar Respondent

Respondent No. 5

Notice to: — Momis Khan Senior Theology Teach C/o DEO (male) Tank 5/10
Malay Khan Vill 5 P/O Amakhel Tehsil 5 Dutt Tank

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 25-11-2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 31st

Day of November 2021.

At Camp
Court D.I. Khan

E. Khan

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1.
2.

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