

28.07.2022

Due to summer vacations, the case is adjourned to 29.09.2022 for the same as before.



Reader

29.09.2022

Learned counsel for the appellant present. Mr. Muhammad Kamran, ADEO alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for official respondents present. None present on behalf of private respondents No. 6 to 10.

Comments on behalf of official respondents submitted, copy of which handed over to learned counsel for the appellant.

Previous date was changed on Reader Note, therefore, notices be issued to private respondents No. 6 to 10 for submission of reply/comments through registered post. Adjourned. To come up for submission of reply/comments on behalf of private respondents No. 6 to 10 on 25.10.2022 before the S.B at Camp Court D.I.Khan.


(Salah-Ud-Din)
Member (J)

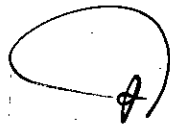
Camp Court D.I.Khan

25.10.2022

Appellant present through counsel.

Kabir Ullah Khattak, learned Additional Advocate General alongwith Muhammad Kamran ADEO for official respondents present. None present on behalf of private respondents No.6 to 12.

File to come up alongwith connected Service Appeal No.7509/2021 titled "Sohail Ahmad Shah Vs. Government of Khyber Pakhtunkhwa" on 22.11.2022 before S.B at Camp Court, D.I.Khan.


(Rozina Rehman)
Member (J)

Camp Court, D.I.Khan

Due to retirement of the Hon'ble
Chairman to come up for the same as
before on 29-03-2022

On
Reader

29.03.2022

Counsel for the appellant present and heard.

The appeal is admitted to full hearing subject to all just and legal objections by the other side. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 24.05.2022 before S.B at camp court, D.I.Khan.

9

Chairman
Camp Court, D.I.Khan.

24.05.2022

Learned counsel for the appellant present and requested for further extension of time to deposit security and process fee, which have not been deposited within the stipulated period.

Learned counsel for the appellant is directed to deposit security and process fee within 04 working days, thereafter, notices be issued to the respondents through registered post for submission of reply/comments on 28.07.2022 before the S.B at Camp Court D.I.Khan.

Appellant Deposited
Security & Process Fee

3/10

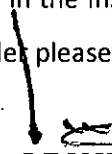

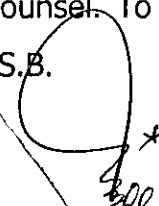


(Saif-ud-Din)
Member (J)
Camp Court D.I.Khan

FORM OF ORDER SHEET

Court of _____


Case No. - 7685 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27/10/2021	<p>The appeal of Mr. Muhammad Ramazan resubmitted today by Mr. Sana Ullah Shamim 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> <p>2-</p> <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>06/12/21</u>.</p> <p style="text-align: right;">  CHAIRMAN </p> <p>06.12.2021</p> <p>None for the appellant present.</p> <p>Notices be issued to the appellant and his counsel. To come up for preliminary hearing on 14.01.2022 before S.B.</p> <p style="text-align: right;">  (MIAN MUHAMMAD) MEMBER (E) </p>

Reference your reply submitted in response to our observation, it is reiterated that the objections/observations rose by this office at serial no. 4, 12 and 14 have not been removed and still stands. Therefore, the appeal in hand is returned for removing the above mentioned observations and resubmission with 15 days.

No. 1856 /S.T,


Dt. 17/09 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Sanaullah Shamim Gandapur Adv.
Supreme Court at D.I.Khan.

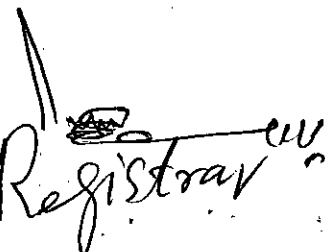
R/s,

The objections are rectified.


Anwar Adv

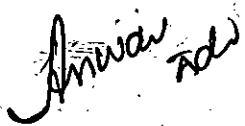
Objection no. 15 is still stand
The appeal is returned to the
counsel for the appellant for
removing the objection within
15 days.

NO 1982 /S.T
Dt. 07/10 (2021)


Registrar

M. Anwar Anwar Adv.

R/s

Objected Removed - 15 no of objection is removed.

Anwar Adv

The appeal presented by Mr. Sana Ullah Shamim Gandapur Advocate today i.e. on 15/07/2021 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Addresses of appellatant and respondents no. 11 to 90 are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- In all documents the name of the appellatant may be highlighted.
- 3- Copy of departmental appeal in respect of appellatant is not attached with the appeal which may be placed on it.
- 4- Annexures-A, C, E and G of the appeal are illegible which may be replaced by legible/better one.
- 5- Photo state has been made on double side of the leaf which is not acceptable the same may be made on one side.
- 6- One copy/set of the appeal in file cover be submitted for Second Member.
- 7- Memorandum of appeal may be got signed by the appellatant.
- 8- Appeal has not been flagged/marked with annexures marks.
- 9- Wakalat nama is unattested.
- 10- Annexures of the appeal may be attested and affidavit may be got attested by the Oath Commissioner.
- 11- Appeal may be page marked according to the Index of the appeal.
- 12- Approved file cover is not used.
- 13- Certificate be given to the effect that appellatant has not filed any service appeal on the subject matter earlier in the Tribunal.
- 14- Check list is not attached with the appeal.
- 15- 92 more copies/sets of the appeal along with annexures i.e complete in all respect may also be submitted with the appeal.

No. 1321 /S.T.

DL 19/07 /2021

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Sanaullah Shamim Gandapur Adv.
Supreme Court at D.I. Khan

Respected Sir,

The addresses of appellatant and respondents are in accordance with Service Rules as mentioned in Seniority list. Copy of departmental appeal of Muhammad Ramzan is amended. All annexures are rectified and now legible. Photocopies are rectified. One set of second member is attached and flagged. Wakalat Nama is duly attested. Certificate is attached with the appeal. Ninety two copies are also attached. Objections received on 27-07-2021.

M. Asad Kamal
AHC 07-08-2021

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title:

M. Ramzan VS Govt of KPK etc

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: <u>M. Anwar Awan ASC</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?		No
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On	✓	
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On	✓	
26	Whether copies of comments/reply/rejoinder submitted? On	✓	
27	Whether copies of comments/reply/rejoinder provided to opposite party? On		

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

Name:

M. Anwar Awan ASC

Signature:

[Signature]

Dated:

03/08/2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No 7685 / 2021

MUHAMMAD RAMZAN VERSUS GOVT OF K.P.K etc.

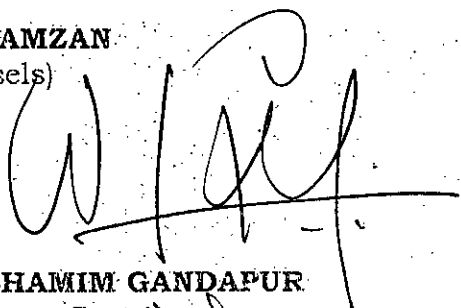
INDEX

S.NO	Particulars	Annexure	Page No
1.	Grounds of Appeal along with affidavit	---	1-8.
2.	Copy of the Petitioner appointment order	A	9-16.
3.	Copy of regularization order dated 10.03.2018	B	17-20
4.	Copies of office order dated 04.06.2020 and office order dated 24.06.2020 and Seniority list	C,D&E	21-26
5.	Copies of objection/reservation and its reply.	F&G	27-31.
6.	Departmental applications/appeals	H	32-35.
7.	Wakalatnamas		36

YOURS HUMBLE APPELLANT

Dated: /06/2021


MUHAMMAD RAMZAN
(Through Counsels)


SANA ULLAH SHAMIM GANDAPUR
Advocate supreme Court
of Pakistan D.I.Khan.


MUHAMMAD ASAD KAMAL.
Advocate High Court D.I.Khan

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No _____ /2021

MUHAMMAD RAMZAN PST GPS BASTI MALIK MEER.

(Appellant)

Khyber Pakhtunkhwa
Service Tribunal

Diry No. 7293

Dated 15/7/2021

VERSUS

1. GOVERNMENT OF KHYBER PAKHTUNKHAWA THROUGH CHIEF SECRETARY, CIVIL SECRETARIAT, PESHAWAR
2. THE SECRETARY ELEMENTARY & SECONDARY EDUCATION, KHYBER PAKHTUNKHAWA, PESHAWAR.
3. DIRECTOR ELEMENTARY & SECONDARY EDUCATION, KHYBER PAKHTUNKHAWA, PESHAWAR.
4. ASSISTANT DIRECTOR (Estb:) ELEMENTARY & SECONDARY EDUCATION, KHYBER PAKHTUNKHAWA, PESHAWAR.
5. DISTRICT EDUCATION OFFICER (DEO) MALE, D.I.KHAN.
6. SUB-DIVISIONAL EDUCATION OFFICER (SDEO) MALE D.I.KHAN.
7. SUB-DIVISIONAL EDUCATION OFFICER (SDEO) MALE PaharPur, D.I.KHAN.
8. SUB-DIVISIONAL EDUCATION OFFICER (SDEO) MALE Kulachi, D.I.KHAN.
9. SUB-DIVISIONAL EDUCATION OFFICER (SDEO) MALE Parova, D.I.KHAN.
10. SUB-DIVISIONAL EDUCATION OFFICER (SDEO) MALE Daraban Kalan, D.I.KHAN.
11. AQAL KHAN GPS NO.1 REHMANIKHEL DISTT: D.I.KHAN
12. ZIA UR REHMAN GPS NO.1 REHMANIKHEL DISTT: D.I.KHAN
13. HIZBULLAH KHAN GPS NO.1 TAKWARA DISTT: D.I.KHAN
14. MUHIB HUSSAIN SHAH GPS NO. 2 DHALLAH DISTT: D.I.KHAN
15. ASSAD HUSSAIN SHAH GPS WANDA TALGI DISTT: D.I.KHAN
16. ABDUR RAUF KHAN GPS KOT MASOODAN DISTT: D.I.KHAN
17. MUHAMMAD ZAFFAR GPS MANDHRA SAIDAN DISTT: D.I.KHAN

Filed to-day

Registrar

18. MUHAMMADZULQARNAIN HAIDER GPS.NO 6 DIKHAN DISTT:
D.I.KHAN
19. MUHAMMAD IQBAL GPS JHOKE JHEDA DISTT: D.I.KHAN
20. NAVEED AHMED GPS BASTI DIRKHAN DISTT: D.I.KHAN
21. GHULAM MOHAY UD DIN GPS BHITANIAN DISTT: D.I.KHAN
22. MUHAMMAD BARAN GPS NO. 2 HAJI MORA DISTT: D.I.KHAN
23. MOHAMMAD ATIFSHAHID GPS KURAI DISTT: D.I.KHAN
24. MUHAMMAD AZAM GPS WAMDA JAMALI DISTT: D.I.KHAN
25. MUHAMMAD RAMZANKHAN GPS MOHALLAH HUSSAIN ZAI
DISTT: D.I.KHAN
26. KARAM ILAHI GPS KANORI DISTT: D.I.KHAN
27. AKHTAR HUSSAIN GMPS GULZAR EMADINA DISTT: D.I.KHAN
28. ZAHID ULLAH KHAN GPS NO.2 KULACHI DISTT: D.I.KHAN
29. MUHAMMAD AHSAN GPS WANDA ARAIEN DISTT: D.I.KHAN
30. BAHADAR KHAN GPS NO.2 PAHARPUR DISTT: D.I.KHAN
31. MUHAMMAD BILAL GPS GARA MORE DISTT: D.I.KHAN
32. MUHAMMAD SAFDAR GPS NO.1 PAHARPUR DISTT: D.I.KHAN
33. ASMAT ULLAH GPS NO.2 PAHARPUR DISTT: D.I.KHAN
34. FAYYAZ HUSSAIN GPS KOTLA SAIDAN DISTT: D.I.KHAN
35. MOHAMMAD AAMIR GPS NO. 12 DIKHAN DISTT: D.I.KHAN
36. MUHAMMAD ASIF GPS NO.3 PAHARPUR DISTT: D.I.KHAN
37. MUHAMMAD HASNAIN GPS MALA KHEL DISTT: D.I.KHAN
38. IMRAN KHAN NIAZI GPS KAMRAN ABAD DISTT: D.I.KHAN
39. FAZAL UR REHMAN GPS MUBARAK SHAH DISTT: D.I.KHAN
40. MUHAMMAD IQBAL GPS MAIZAR ABAD DISTT: D.I.KHAN
41. INAYAT ULLAH GPS WANDA ABBU DISTT: D.I.KHAN
42. GHULAM ISHAQ GPS W/ BLOCHAN CRBC DISTT: D.I.KHAN
43. NAVEED ANJAM GPS NO. 9 DIKHAN DISTT: D.I.KHAN
44. MUHAMMAD RIAZ GPS NO. 7 DIKHAN DISTT: D.I.KHAN
45. MUHAMMAD FAROOQ GPS KOT MASOODAN DISTT: D.I.KHAN
46. HASSAN ALI GPS KURRAR DISTT: D.I.KHAN
47. MUHAMMAD ARSHADIQBAL GPS ARA DISTT: D.I.KHAN
48. NAJAM ALI GPS CHAH BARE WALA DISTT: D.I.KHAN
49. MUHAMMAD MUNIR GPS RANG PUR SHUMALI DISTT: D.I.KHAN
50. NADEEM IRFAN GPS NAD ALI SHAH DISTT: D.I.KHAN
51. SAJJAD AHMAD GPS ZAWAR SHUMALI DISTT: D.I.KHAN
52. SHER ZAMAN GPS NO. 11 DIKHAN DISTT: D.I.KHAN

53. MUHAMMAD HUMAYUNKHAN GPS GARA MIR ALAM DISTT:
D.I.KHAN
54. ZAMIR HUSSAIN GPS CENTRAL JAIL DISTT: D.I.KHAN
55. SAADULLAH KHAN GPS NO. 9 DIKHAN DISTT: D.I.KHAN
56. MOHAMMAD AAMIR GPS NO. 1 DIKHAN DISTT: D.I.KHAN
57. MUHAMMAD AMIR GPS BASTI TAREEN DISTT: D.I.KHAN
58. ZUBAIR AHMAD GPS JHOK MOZAM DISTT: D.I.KHAN
59. SADAQAT ULLAH KHAN GPS KIRI KHALIFA DISTT: D.I.KHAN
60. MUHAMMAD KHALIL GPS BUDHAN DISTT: D.I.KHAN
61. RIAZ AHMAD GPS BAGI QAMAR DISTT: D.I.KHAN
62. NAJEEBULLAH KHAN GPS CHAH BARE WALA DISTT:
D.I.KHAN
63. HAMID ULLAH GPS BIGWANI SHUMALI DISTT: D.I.KHAN
64. SAMIULLAH KHAN GPS NIAZI ABAD DISTT: D.I.KHAN
65. NAJEEB UR REHMAN GPS KURAI DISTT: D.I.KHAN
66. ISHTIAQ AHMED GPS KPK DISTT: D.I.KHAN
67. WAQAS IQBAL GPS NO. 7 DIKHAN DISTT: D.I.KHAN
68. SYED IQBAL HUSSAINSHAH GPS BIGWANI SHUMALI DISTT:
D.I.KHAN
69. GHULAM QASIM GPS BASTI SHEIKHANWALI DISTT: D.I.KHAN
70. REHMAT ULLAH GPS CHAH FAQEERWALA DISTT: D.I.KHAN
71. KHALID RAZA GPS NO. 2 DHAKKI DISTT: D.I.KHAN
72. MUHAMMAD SHOAIBHUSSAIN SHAH GPS TOBA DISTT:
D.I.KHAN
73. MUHAMMAD QISMATULLAH KHAN GPS GARA MOHABBAT
DISTT: D.I.KHAN
74. TAUFIQ AHMAD GPS NO. 3 D.I.KHAN DISTT: D.I.KHAN
75. ABDUL WAHID GPS LACHRA DISTT: D.I.KHAN
76. RAHMATULLAH GPS THATHAL DISTT: D.I.KHAN
77. M. JAVOID IQBAL SADIQI GPS THATHAL DISTT: D.I.KHAN
78. MUHAMMAD NADEEM GSP KACHA MALANA NO.2 DISTT:
D.I.KHAN
79. ABDUL AZIZ KHAN GPS NO. 2 HAJI MORA DISTT: D.I.KHAN
80. SAMI ULLAH KHAN GPS QAZI MUHAMMADJAN DISTT: D.I.KHAN
81. MUHAMMAD TARIQ GPS NO. 2 THOYA DISTT: D.I.KHAN
82. ALAMGIR GPS KOTHA BALOCHAN DISTT: D.I.KHAN
83. ABDUL HAMEED GPS SAGGU JUNOBI DISTT: D.I.KHAN

84. HAFIZ MUHAMMADTAHIR RASHID GPS CHEHKAN DISTT:
D.I.KHAN.
85. ABDUR RASHID GPS KHARU KHEL SHUMALI TEH: PAHARPUR
DISTT: D.I.KHAN.
86. MUHAMMAD HAMID GPS NO.5 TEH: & DISTT: D.I.KHAN.
87. MUHAMMAD EHSAN GPS WANDA HASHIM THE & DISTT:
D.I.KHAN.
88. ATTUL MUNIM SHAH GPS BAND KURAI TEH: PAHARPUR DISTT:
D.I.KHAN.
89. RIAZ AHMAD GPS NO.4 DARABAN KALAN TEH: DARABAN
KALAN DISTT: D.I.KHAN.
90. MUZZAMEL KHAN GPS NO.1 ABDUL KHEL TEH: PAHARPUR,
DISTT: D.I.KHAN

(RESPONDENTS)

**SERVICE APPEAL UNDER SECTION-4 OF SERVICE
TRIBUNAL ACT, TO DIRECT THE RESPONDENTS
TO REVISE/CORRECT THE SENIORITY LIST
ISSUED BY THE RESPONDENTS AND PROMOTE
THE APPELLANT WITH EFFECT FROM 17.05.2014
DATE OF INITIAL APPOINTMENT OF APPELLANT
ON THE BASIS OF HIS SENIORITY ALONG-WITH
BACK BENEFITS OF SERVICE.**

Note: That addresses of the parties given above are sufficient for the purpose of service.

Respectfully Sheweth,

The Appellant respectfully submits as under:

1. That the Appellant is appointed as primary school teachers (PST) through NTS on 17.05.2014, while Respondents No.07 to 80 are also appointed as primary school teachers (PST) through NTS on 05.12.2014 on contract basis. Copy of the Appellant appointment order is enclosed as **Annexure-A.**

2. That the Appellant is qualified respectable primary school teachers (PST) after his appointment has been serving the Department with due diligence, utmost care and devotion, always tried to give his best and has spotless Service record throughout his Service. the service of the Appellant was regularized on 10.03.2018. Copy of regularization order dated 10.03.2018 is enclosed as **Annexure-B.**
3. That on 04.06.2020 the concerned District Education Officer vide letter No.11728 has sought guidance for preparing the seniority list of PSTs, the mechanism was provided by the Assistant Director (Estab:) Elementary & Secondary Education Department Khyber Pakhtunkhwa (Respondent No.04) then a seniority list was prepared by the Respondents. Copies of office order dated 04.06.2020 and office order dated 24.06.2020 and Seniority list are enclosed as **Annexure-C,D & E respectively.**
4. That in the impugned seniority list the Respondents No. 07 to 80 which are juniors to the appellant are placed earlier/seniors and given senior portion in the impugned seniority list but the appellant even being senior is placed on junior portion in the said seniority list.
5. That as per general criteria for promotion in the education department / being civil servant is to consider the service length from the date of initial appointment of the employee/promote which is quiet absent in the impugned seniority list.
6. That on 08.01.2021 the appellant along with others submitted their objection/reservations on the impugned seniority list prepared by the Department to the competent authority and the same was replied/rejected on 09.02.2021. Copies of objection/reservation and its reply are enclosed as **Annexure-F &G respectively.**
7. That the Appellant along with others has preferred departmental applications/appeals through proper channel and being senior employee sought his promotion on the basis of his seniority with effect from their initial appointment dated:17.05.2014. Copies of Appellant Departmental application/appeal is enclosed as **Annexure- H respectively.**

8. That feeling aggrieved from above said action appellants are constrained to approaches this honorable court on the following amongst other:

GROUND:

1. That the action of respondents is against facts and law, ultra vires, without Jurisdiction and against the Khyber Pakhtunkhwa Employees of Elementary and Secondary Education Department (Appointment and Regulation of Services) Act 2017 as well as Khyber Pakhtunkhwa Civil Servants. (Appointment, Promotion and Transfer) Rules 1989.
2. That as per rules framed by the government of KPK and also Regularization Act 2017, it is clearly mentioned that seniority of teachers would be reckoned from Section 4 of ibid Act but respondents without any lawful authority issued seniority list on its whims and wishes.
3. That as per appointment Order of petitioner issued on 17.05.2014, he was appointed in teaching cadre on terms and conditions mentioned in the Order from the date of their taking over charge but surprisingly the private respondents who were appointed on 05.12.2014, are placed senior to the petitioner on the basis of their marks which is totally against the policy and terms and conditions mentioned in the appointment order.
4. That while regularizing the petitioner and others Primary School

Teachers vide Order dated: 10.03.2018 it was termed that their seniority shall be determined on the basis of their continuous service in cadre so appellant has took the charge of the post in May 2014 while private respondents took the charge in the month of December 2014 so appellant by efflux of time is senior to the private respondents.

5. That it is also evident from the regularization order dated: 10.03.2018, the PSTs appointed on 17.05.2014 are mentioned firstly and thereafter PSTs appointed on 05.12.2014 are mentioned in ibid Order which clearly reflect that the department has issued seniority of all PSTs appointed through the above-said orders.

In wake of above submissions, it is respectfully prayed that on acceptance of instant appeal, the seniority list may please be set aside/modified being illegal, void and against the Khyber Pakhtunkhwa Employees of Elementary and Secondary Education Department (Appointment and Regulation of Services) Act 2017 as well as Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989 and appellant may graciously be promoted from BPS-12 to BPS- 14 with all back/ future benefit.

OR

If any other efficacious relief which this august Tribunal may deem proper/appropriate in the interest of justice may also be granted to the Appellant.

YOUR HUMBLE APPELLANT

DATED: /06/2021

M. Ram
MUHAMMAD RAMZAN
(Through Counsels)

Sana Ullah Shamim Gandapur
SANA ULLAH SHAMIM GANDAPUR
Advocate supreme Court
of Pakistan D.I.Khan.

KANEEZ BATOOL
Advocate High Court D.I.Khan

AFFIDAVITE

I, **MUHAMMAD RAMZAN PST GPS BASTI MALIK MEER**. The Appellant, do hereby solemnly affirm and declare on oath that all the contents of the Appeal are true and correct to the best of my knowledge and belief and noting has been deliberately concealed from this Honorable Court.

M. Ram
Deponent

Identified by Counsel;

Sana Ullah Shamim Gandapur
SANA ULLAH SHAMIM GANDAPUR
Advocate supreme Court
of Pakistan D.I.Khan.

Certificate..

*It is certified that no appeal against impugned
Senority is filed or pending in any court of law.*

Sana Ullah Shamim Gandapur

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DERA ISMAIL KHAN

APPOINTMENT

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of PST, School based, in BPS-12 (Rs. 7000-500-22000) @ Rs. 7000/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge:-

S.No	Roll No	NAME	FATHER'S NAME	CNIC	SCORE	PLACE OF POSTING	UNION COUNCIL
DERA ISMAIL KHAN							
1.	1760062	MUHAMMAD SHAHID	QAYYUM NAWAZ	12101-6286930-3	93.5	GPS DARWESHA	CHEHKAN
2.	1760177	BASHIR AHMAD	MUHAMMAD AFZAL	12101-8038430-1	97.19	GPS GARA BALA	CHEHKAN
3.	1760752	NAVEED AHMAD	NAZIR AHMUD	12101-2041550-9	109.58	GPS GARA HASSANI	CHEHKAN
4.	1760368	MUHAMMAD RAMZAN	SHER ZAMAN	12101-7034423-1	116.35	GPS GARA AJORE	CHEHKAN
5.	1760733	RAHMAT ULLAH	SARFARAZ	12101-5709320-3	95.33	GPS HAIN DAN	CHEHKAN
6.	1760335	MAZHAR IQBAL	MUHAMMAD IQBAL	12101-4536514-5	87.57	GPS JANDI SINDHI	CHEHKAN
7.	1761263	MUHAMMAD ABBAS	MUHAMMAD RAMZAN	12101-1989179-5	109.62	GPS JEVAYA SAHI	CHEHKAN
8.	1760735	MUHAMMAD SALEEM	KARIM BAKHSH	12101-0972120-3	117.46	GPS NO. 2 POTA	CHEHKAN
9.	1762690	MUHAMMAD NADEEM AKHTAR	MUHAMMAD ASLAM	12101-3818810-5	87.92	GPS NO. 2 POTA	CHEHKAN
10.	1761200	RAB NAWAZ	GUL SHER	12101-7539649-3	95.9	GPS NURANG UTRA	CHEHKAN
11.	1761043	ABDUL BASAT	MAULVI GHULAM HASSAN	12101-3958240-7	116.49	GPS SHERU KOHNA	CHEHKAN
12.	1760108	SANA ULLAH	GHULAM QADIR	12101-9636197-3	88.45	GPS SIKANDAR SHUMALI	CHEHKAN
13.	1766822	SHAHZADA MUHIB ULLAH	MUHAMMAD ASLAM	12101-3837795-9	92.31	GPS SIWAG	CHEHKAN
14.	1760603	MUHAMMAD ALTAJ KHAN	UMAR HAYAT KHAN	12101-7309163-5	98.29	GPS TAJ	CHEHKAN

Attended
1/10/20
1/10/20

10

No	Roll No	NAME	FATHER'S NAME	CNIC	SCORE	PLACE OF POSTING	UNION COUNCIL
596.	1760936	BASHIR AHMAD	ALLAH DAD	12101-0923553-7	111.75	GPS GARA GHUNS SHAH	Naivela
597.	1763432	MUHAMMAD IMRAN	GHULAM YASIN	12101-5142048-1	107.22	GPS GARA GHUNS SHAH	Naivela
598.	1760396	SHAIKAT IQBAL KHAN	AMAN ULLAH	12101-3535761-3	105.03	GPS GARA GHUNS SHAH	Naivela
599.	1760536	SHOAB UR REHMAN	GHULAM SUBHANI	12101-2071864-1	125.38	GPS GARA RASHID	Naivela
600.	1762569	ABDUR RASHID	ABDUL MAJEED	12101-5364225-9	102.87	GPS GURMANI	Naivela
601.	1760217	MUHAMMAD SHEHZAD	GHULAM YASIN	12101-5046193-1	133.26	GPS HAJI BABBAI	Naivela
602.	1760744	MUHAMMAD IBRAHIM	IMAM BAKHSH	12101-0991881-9	123.29	GPS JATTA	Naivela
603.	1760725	ABDUL QADIR	NAZIR AHMAD KHAN	12101-5911194-3	112.09	GPS JATTA	Naivela
604.	1761905	MUHAMMAD KAMRAN	MALIK SUBA	12105-0344435-5	104.43	GPS JATTA	Naivela
605.	1760806	HAJI MUHAMMAD	ABDUR REHMAN	12101-7338172-9	98.28	GPS JH; MASSU	Naivela
606.	1760041	MUSHTAQ AHMAD	JUMA KHAN	12101-0924424-5	116.4	GPS KHANA SHARIF	Naivela
607.	1760268	AMAN ULLAH	ALLAH BAKHSH	12101-9678214-7	86.77	GPS BABAR KACHA	PAROA
608.	1763630	GHULAM ABBAS	MUHAMMAD ASLAM KHAN	12101-0413474-5	88.23	GPS BABAR PAKKA	PAROA
609.	1762943	MUHAMMAD AAMIR	MUHAMMAD RAMZAN	12101-4243356-7	83.89	GPS BABAR PAKKA	PAROA
610.	1760642	MUHAMMAD RAMZAN	MUHAMMAD BAKHSH	12101-1470463-1	85.4	GPS BASTI MALIK MIR	PAROA
611.	1750457	MUHAMMAD SHAFQAT	ABDUL AZIZ	12101-2526976-1	87.77	GPS BHIRKI	PAROA
612.	1763977	MUHAMMAD IMRAN	LAAL KHAN	12101-7582792-7	85.37	GPS HAZARA KACHA	PAROA
613.	1762876	MUHAMMAD IMRAN	HAJI ISMAIL	12101-1324020-7	122.05	GPS JH; MACHI SHERQI	PAROA
614.	1760566	HAMADULLAH	GHULAM HUSSAIN	12101-6121532-1	89.18	GPS JH; SALAUD DIN	PAROA
615.	1763279	GHULAM MURTAZA	SIRAJ U DIN	12101-6724482-3	97.63	GPS NO.1 PAROA	PAROA
616.	1760592	GHULAM YASIN	AHMAD BAKHSH	12101-2858944-9	100.4	GPS NO.2 PAROA	PAROA
617.	1760407	INAM ULLAH	RAHMAT ULLAH KHAN	12101-2356055-5	86.53	GPS NO.2 PAROA	PAROA

Handwritten signature and initials

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

S.No	Roll No	NAME	FATHER'S NAME	CNIC	SCORE	PLACE OF POSTING	UNION COUNCIL
618.	1760171	OBAD ULLAH	KHALIL UR RAHMAN	12101-0899685-3	124.87	GPS NO.3 PAROA	PAROA
619.	1762676	MUHAMMAD KHALID	SAIF ULLAH	12101-1005269-1	87.08	GPS NO.4 PAROA	PAROA
620.	1764238	SHAH NAWAZ	RAB NAWAZ	12101-0930161-1	92.85	GPS NO.5 PAROA	PAROA
621.	1761938	SAMI ULLAH	QADIR BAKHSH	12101-2693445-1	84.6	GPS NO.5 PAROA	PAROA
622.	1760563	RASHEED AHMAD	DUR MUHAMMAD	12101-5965545-1	86.05	GPS THAT SOLAN	PAROA

TERMS & CONDITIONS

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year from the date of issuance.
4. He should not be handed over charge if he exceeds 35 years or below 18 years of age. Age relaxation case may be submitted to competent authority (if required).
5. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO, anyone found producing bogus Certificate will be reported to the law enforcing agencies for further action. Expenditure on verification will be borne by the appointees.
6. His services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
7. Pay will not be drawn until and unless a certificate regarding verification of his documents is issued by this office.
8. He should join his post within 10 days of the issuance of this notification. In case of failure to join the post within stipulated period, his appointment will stand expired automatically and no subsequent appeal etc shall be entertained.
9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. Before handing over charge, he will have to sign an agreement with the Department; otherwise this order will not be valid.
11. He will be governed by such rules and regulations as may be issued from time to time by the Govt.
12. His services shall be terminated at any time, in case his performance is found unsatisfactory during his contract period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
13. His appointment is made on School based, He will have to serve at the place of posting, and His service is not transferable to any other station.

Attested
[Signature]

13. His appointment is made on School based. He will have to serve at the place of posting. and His service is not transferable to any other station.
14. Before handing over charge, once again their document may be checked by the DDO concerned, if they have not the required relevant qualifications as per rules or in case of any degree/certificate issued after January 20, 2014 against which he claimed score for merit they may not be handed over charge of the post.
15. The appointee must belong to the same union council where school is situated; otherwise, the DDOs are directed, not to hand over the charge.

Zia-ud-Din
District Education Officer (M)
DIKHAN

Endst No. 7135-7765 /PST(M) NTS

Dated DIKkhan the 17-05-2014

Copy forwarded for information and necessary action to:

1. The Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. The District Comptroller of Accounts DIKHAN.
3. The PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department.
4. The SDEOs (Male) DIKhan/Paharpur/Paroa/Kulachi.
5. The Candidates Concerned.
6. Master File.

*Accepted
Zia-ud-Din
17/5/14*

Zia-ud-Din
District Education Officer (M)
DIKHAN

Zia-ud-Din Awan
Associate Supreme Court,
DIKHAN

Annexure 13

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DERA ISMAIL KHAN

+ Responses
Hrty appal

APPOINTMENT

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the vacant post of PST (School based) in BPS-12 (Rs. 7000-500-22000) @ Rs. 7000/- fixed plus usual allowances as admissible under the rules on adhoc basis, on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge.

Roll No.	Name	Father Name	D.O.B.	CRIC	Merit Position	Place of Posting	Order/Remarks
1760493	NAHAT ULLAH	MUHAMMAD AMIR	05/06/1984	12101-822282-3	33.59	GPS CHEHRAN	CHEHRAN
1760501	HAFIZ MUHAMMAD TARIQ RASHID	ABDUR RASHID KHAN	01/08/1989	12101-8667199-9	100.25	GPS GARA AHMAD	CHEHRAN
1760502	ABU SAJJAD NAJIB	MUHAMMAD NAJIB	01/04/1994	12101-1701491-3	85.22	GPS GARA DAR	CHEHRAN
1760507	MUHAMMAD SYED	ABDUL RAHEEM	57	12101-7201430-7	111.67	GPS GARA MOH	CHEHRAN
1760514	MUHAMMAD YASIN	ABDUS SALAM	04/01/1986	12101-4119138-3	98.95	GPS NO. 1 POTA	CHEHRAN
1760517	FAHIM ULLAH	FAZAL AHMAD	16/08/1992	12101-3027815-5	64.21	GPS SHIKRU KOHNA	CHEHRAN
1760536	SHADIM RASOOL	SAID RASOOL	14/01/1973	12101-3907680-9	84.88	GPS SHERU KHAN	CHEHRAN
1760500	MUHAMMAD QASIM MUDDASSIR	HAFIZ FLAH RAHESH	05/03/1981	12101-5713694-9	95.46	GPS ASHA MASJID	CHEHRAN
1760549	NAJAM ALI	MASHIQ MUHAMMAD SHAIKH	07/04/1981	12101-0919804-9	108.59	GPS GILAF SARWAR	DD # 1
1762261	NAVEED AMIEN	ABDUL MAJEED	15/04/1985	12101-6829025-5	115.36	GPS EASTI DIRKHA	DD # 1
1764205	NAJIBULLAH KHAN	HABIBULLAH KHAN	17/07/1984	12101-0657230-9	106.63	GPS CHAH BASHY VALA	DD # 1
1762298	MALIK MUHAMMAD ALTAJ	MUHAMMAD NAJIB	15/05/1979	12101-0092358-5	83.83	GPS KASSA	DD # 2
1762369	SHIHO AHMED	SUFI GHULAM HASSAN	27/03/1976	12101-9150160-1	105.22	GPS KACHH PAIND KHAN	DD # 2
1760473	MUHAMMAD TARIQ	MUHAMMAD RAMZAN	24/09/1978	12101-9956478-3	100.98	GPS NO. 2 THOYA FAZIL	DD # 2
1760973	IMRAN ULLAH	GHULAM HASSAN	12/11/1988	12101-1589768-3	85.57	GPS NO. 3 THOYA FACIL	DD # 2
1761032	SADU SOHAIL	MUHAMMAD KHALID USAR	20/03/1984	12101-3623944-9	89.58	GPS JAMM ABAD	DD # 2
1761532	NADEEM IRFAH	ABDUR REHMAN	01/07/1973	12101-0913331-7	107.87	GPS MAD ALI SHIP	DEEWALA
1762665	MUHAMMAD NASIR KHAN	SHAH HAWAZ KHAN	04/02/1981	12101-0375915-1	100.57	GPS POLICE LINE	DEEWALA
1760672	IMRAN ULLAH	SAHIB JAN	01/04/1976	12101-0244476-7	111.6	GPS RAJADARI	GHUFT
1762390	USMAN ALI	HAZIR AHMAD	04/02/1985	12101-5723882-9	115.91	GPS NO. 1 GILTI	GHUFT

Attended
Office
Date

(14)

14

Appointment Orders PST (Male) 2nd Phase, Adhoc. D.Khan

Sl. No.	Roll No.	Name	Father Name	D.O.B.	QNIC	Merit Position	Place of Posting	Union Council
21	1760390	INAYAT ULLAH	SAIF ULLAH	05/04/1985	12101-9123651-9	109.68	GPS WANDA ABHU	GILOTTI
22	1760190	MUHAMMAD SALEEM	YASEEN	03/01/1989	12101-9168133-3	83.68	GPS AZIZ ABAD	HISSAM
23	1760759	SHAFIQ UR REHMAN	AMIR KHAN	22/03/1988	12101-4231644-3	89.25	GPS GARA RAHMAN	HISSAM
24	1760623	GULISTAN	FAIZ UR REHMAN	02/11/1984	12101-2489761-1	92.22	GPS NIAZI ABAD	HISSAM
25	1760785	MUHAMMAD ARIF	SHER ZAMAN	02/02/1999	12101-1219968-1	80.16	GPS NIAZI ABAD	HISSAM
26	1760332	ABDUL HAMEED	MUHAMMAD HASHIM	12/10/1988	12101-6061024-9	100.25	GPS SAGGU JANUBI	HISSAM
27	1760413	MUHAMMAD ZUBAIR	GHULAM QADIR	11/09/1993	12101-8537542-9	79.71	GPS SOHLAN	HISSAM
28	1760358	MUHAMMAD IMRAN	NADIR BAKHSI	20/10/1988	12101-8595425-1	93.07	GPS WAZIR NAGAR	HISSAM
29	1767981	GHULAM YASIN	LAB NAWAZ	05/09/1973	12101-0284583-3	96.26	GPS ABDULLAH ABAD	KECI
30	1763138	FAIZ ABUAS	MULAZIM HUSSAIN	01/01/1978	12101-7245134-5	80.35	GPS JABAR WALA	KECI
31	1760438	MUHAMMAD IQBAL	HAJI MUHAMMAD RAMZAN	10/10/1987	12101-4397845-3	109.74	GPS MATZER ABAD	KECI
32	1762171	FAKHR ZAMAN	FAIZ MUHAMMAD	20/02/1978	12103-1479351-1	81.51	GPS NO. 1 MUQEEM SHAH	KECI
33	1762399	MUHAMMAD ASLAM	LAL GUL	06/09/1992	12101-3464719-1	73.61	GPS NO. 1 MUQEEM SHAH	KECI
34	1760450	MUHAMMAD AFSHAD IQBAL	MUHAMMAD LATIF AKHTAR	04/04/1979	12101-9695114-7	108.82	GPS AJLA	KOTLA SAIDAN
35	1760678	REHMAT ULLAH	GHULAM QASIM	03/11/1988	12101-2909724-3	104.49	GPS CHAH FAQER WALA	KOTLA SAIDAN
36	1762270	MUHAMMAD ASLAM KHOKHAR	REHMAT ULLAH	06/08/1974	12101-8846286-9	89.58	GPS DIN PUR	KOTLA SAIDAN
37	1762080	IKRAM ULLAH	ALLAH DEWAYA	11/01/1991	12101-7026501-5	89.45	GPS DIN PUR	KOTLA SAIDAN
38	1760357	MUHAMMAD IMRAN	FAZAL UR REHMAN	14/03/1990	12101-4608343-7	87.86	GPS DIN PUR	KOTLA SAIDAN
39	1760192	MUHAMMAD TARIQ	MUHAMMAD HASHIM	01/12/1988	12101-2733497-1	87.39	GPS DIN PUR	KOTLA SAIDAN
40	1762603	IMRAN KHAN NIAZI	GHULAM RASOOL	31/03/1982	12101-0960061-1	110.03	GPS KAMRAN ABAD	KOTLA SAIDAN
41	1763887	FAYYAZ HUSSAIN	SYED ZAKIR HUSSAIN SHAH	04/01/1979	12101-0531672-9	110.94	GPS KOTLA SAIDAN	KOTLA SAIDAN
42	1760378	MUHAMMAD AMIN	ILLAHI BAKHSI	20/03/1978	12101-8273727-3	94.04	GPS NAWAH	KOTLA SAIDAN
43	1760367	IMRAN KHAN	SHAH NAWAZ	10/03/1984	12101-1667467-9	77.99	GPS GARA BAKHSIA	KURAI
44	1760522	AKHTAR ZAMAN	ALAMGIR KHAN	01/01/1970	12103-1495187-9	82.47	GPS GARA HAYAT	KURAI
45	1760284	MUHAMMAD YOUNAS	HAFIZ BASHIR AHMAD	09/02/1988	12101-9276771-7	78.5	GPS GARA HAYAT	KURAI
46	1763304	MUHAMMAD AKRAM	MUHAMMAD ASLAM	15/04/1984	12101-5486048-3	91.45	GPS GOMAL KHURD	KURAI
47	1762751	MUHAMMAD ATIF SHAHID	AMAN ULLAH	18/04/1993	12101-7149183-1	113.84	GPS KURAI	KURAI
48	1762895	NAJEEB UR REHMAN	SHAIKH SONA KHAN	16/01/1979	12101-7740667-3	105.78	GPS KURAI	KURAI

Attested
[Signature]

Appointment Orders PST (Male) 2nd Phase, Adhoc. Dikhan

15

24

Sr. No.	Roll No.	Name	Father Name	D.O.B.	CNIC	Merit Position	Place of Posting	Union Council
215	1754226	MUHAMMAD WASEEM SATTAR	ABDUL SATTAR JASKANI	25/04/1987	32103-7171202-1	87.69	GPS NO. J RAMAK	MIRAN
216	1760469	ABDUL SATTAR	ZAWAR HUSSAIN	12/03/1987	12101-9200930-5	87.39	GPS GARA TAHIR	NAIVELA
217	1760798	ALAMGIR	IMAM BAKHSH	25/10/1980	12101-1258640-5	100.53	GPS KOTAH BALOCHAN	NAIVELA
218	1763099	INTIZAR HUSSAIN	MUHAMMAD HUSSAIN	25/12/1991	12101-5753979-5	83.96	GPS NAIVELA	NAIVELA
219	1760145	MUHAMMAD ISHAQ KHAN	AMAN ULLAH KHAN	01/03/1981	12101-0992030-7	83.62	GPS DHANDIA	PAROA
220	1762569	MASITUL QUDDOS	HAJI ABDUL QUDDOS	24/04/1978	12101-0989303-3	94.11	GPS LADHU KAREU	PAROA

TERMS & CONDITIONS

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year from the date of issuance.
4. He should not be handed over charge if his age exceeds 35 years or below 18 years, except that appointee to whom age relaxation is granted by the Establishment Department as well as by the appointing authority.
5. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO. Anyone found producing bogus Certificate will be reported to the law enforcing agencies for further action. Verification fee will be borne by the appointee.
6. His services are liable to termination on one month's notice from either side. In case of resignation without notice, his one-month pay/allowances shall be forfeited to the Government.
7. Pay will not be drawn until and unless a certificate regarding verification of his documents is issued by this office.
8. He should join his post within 10 days of the issuance of this notification. In case of failure to join the post within stipulated period, his appointment will stand expired automatically and no subsequent appeal etc. shall be entertained.
9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. Before handing over charge, he will have to sign an agreement with the Department; otherwise this order will not be valid.
11. He will be governed by such rules and regulations as may be issued from time to time by the Govt.
12. His services shall be terminated at any time, in case his performance is found unsatisfactory during his contract period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
13. His appointment is made on School based. He will have to serve at the place of posting, and his service is not transferable to any other station.
14. Before handing over charge, once again his documents may be checked by the DEO concerned, if he has not the required relevant qualification as per rules or in case of any degree/certificate issued after January 20, 2014 against which he claimed score for merit he may not be handed over charge of the post.

Attested
[Signature]
 [Signature]

22

16

... to the same union council. There will be a ...
... directed not to hand over the charge ...
... standards, competencies and job description for PST ...
... Govt. of Khyber Pakhtunkhwa, T&SH Notification No. ...
... dated 17.09.2014 (attached with the appointment order).

Muhammad Riaz Swat
District Education Officer
Dera Ismail Khan

No. 23374/PST(NTS) Date DDK: 05/12/2014

For information and necessary action to

- The Director T&SH Khyber Pakhtunkhwa, Peshawar
- The District Comptroller of Accounts DIKLIAN
- The PS to the Secretary to Govt. Khyber Pakhtunkhwa, T&SH Department
- The SMC (Male) DIKhan Paharpur/Paroo/Kulachi
- The Candidates Concerned.
- Master File.

Attended
[Signature]

[Signature]

District Education Officer
Dera Ismail Khan

- B -

17

Regularization Order PST/(NTS Adhoc) (2018) Dera Ismail Khan



**OFFICE OF THE
DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN**
Telt: 09669280128- 09669280131
Email: emisdikhan@gmail.com

NOTIFICATION:

In pursuance of Section-3 of the Khyber Pakhtunkhwa Employees of Elementary & Secondary Education Department (Appointment & Regularization of Services) Act, 2017, read with section-1 sub-section-(2) of the Act ibid and Law Department Government of Khyber Pakhtunkhwa advice bearing No. ALD-III/Legis:1(4)2017/Vol-1/9888-90 dated 20/03/2017 & Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. SO(S/F)E&SED/3-2/2018/SITT/Contract dated 22-02-2018, the services of following Primary School Teachers (PSTs) are hereby regularized in BPS-12 with effect from the date of their initial appointment.

Sr	RollNo	Name	Total Marks [out of 200]	School	UC	Appointment order No and dated	Extension order No and dated if any	CNIC
1	1760002	MUHAMMAD SHAHID	93.5	GPS DARWESHA	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-6286930-3
2	1760477	BASHIR AHMAD	97.19	GPS GARA BALA	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-8038430-1
3	1760752	NAVEED AHMAD	109.58	GPS GARA HASSANI	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-2041550-9
4	1760368	MUHAMMAD RAMZAN	116.35	GPS GARA MORE	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-7034423-1
5	1760733	RAHMAT ULLAH	95.33	GPS HAIN DAN	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-5709320-3
6	1760335	MAZHAR IQBAL	87.57	GPS JANDI SINDHI	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-4536514-5
7	1762690	MUHAMMAD NADDEM AKHTAR	87.92	GPS NO. 2 POTA	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-3818810-5
8	1764200	RAB NAWAZ	95.9	GPS NURANG UTRA	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-7539649-3
9	1764043	ABDUL BASAT	116.49	GPS SHERU KOHNA	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-3958240-7
10	1760108	SANA ULLAH	88.45	GPS SHKANDAR SHUMALI	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-9636197-3
11	1760822	SHAHZADA MUHIB ULLAH	92.31	GPS SIWAG	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-3837795-9
12	1760603	MUHAMMAD ALTAJ KHAN	98.29	GPS TAJ	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-7309163-8
13	1762586	MATI ULLAH	112.95	GPS BASTI DIRKHAN	DD# 1	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-8937011-7
14	1763381	MUHAMMAD JAVED KHAN	98.86	GPS CHAH BAREY WALA	DD# 1	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-5971143-9
15	1760005	MUHAMMAD YOUNIS	127.49	GPS KACHI PAIND KHAN	DD#2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-3032309-7
16	1763031	MUHAMMAD WAQAR AHMAD	112.77	GPS NO. 1 THOYA FAZIL	DD#2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-7810587-1
17	1760365	MALIK UMAIR YASIN	107.28	GPS NO. 1 THOYA FAZIL	DD#2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-4961211-7
18	1760921	AFNAN KHAN	103.37	GPS NO. 1 THOYA FAZIL	DD#2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0217538-7
19	1760280	AZMAT ULLAH	101.43	GPS NO. 2 THOYA FAZIL	DD#2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0953316-5
20	1760338	SAMI ULLAH KHAN	91.13	GPS NO. 2 THOYA FAZIL	DD#2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-7097201-5
21	1760755	MALIK MUHAMMAD IRFAN	88.19	GPS TAHIM ABAD	DD#2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-8201696-9
22	1760835	MUHAMMAD HASSIM	102.24	GPS BASTI DHAPPAN WALI	Deewala	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0936562-1
23	1760648	MUHAMMAD ILYAS	107.04	GPS CHAH MALIK WALA	Deewala	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-7076740-5
24	1760028	MUHAMMAD EHSAN	105.62	GPS CHAH MALIK WALA	Deewala	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0940626-9
25	1760808	ZUBAIR AHMAD	103.41	GPS MADNI TOWN	Deewala	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-3119854-5

Approved
[Signature]

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

[Handwritten mark]

18

Regularization Order PST/(NTS Adhoc) (2018) Dera Ismail Khan

Sr	RollNo	Name	Total Marks (out of 200)	School	UC	Appointment order No and dated	Extension order No and dated if any	CNIC
523	1760636	HIDAYAT ULLAH	124.5	GPS BUCHRI	Naivcla	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-5048995-5
524	1763478	MUHAMMAD RIZWAN	98.29	GPS GARA ASHIQ	Naivcla	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-5192880-1
525	1760936	BASHIR AHMAD	111.75	GPS GARA GHUNS SHAH	Naivcla	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0923553-7
526	1760396	SHAIKAT IQBAL KHAN	105.03	GPS GARA GHUNS SHAH	Naivcla	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-3535761-3
527	1760536	SHOAIB UR REHMAN	125.38	GPS GARA RASHID	Naivcla	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-2071864-1
528	1762569	ABDUR KASHID	102.87	GPS GURMANI	Naivcla	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-5364225-9
529	1760744	MUHAMMAD IBRAHIM	123.29	GPS JATTA	Naivcla	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0991881-9
530	1760725	ABDUL QADIR	112.09	GPS JATTA	Naivcla	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-5911194-3
531	1761905	MUHAMMAD KAMRAN	104.43	GPS JATTA	Naivcla	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12105-0344435-5
532	1760806	HAJI MUHAMMAD	98.28	GPS JH; MASSU	Naivcla	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-7338172-9
533	1760041	MUSHTAQ AHMAD	116.4	GPS KHANA SHARIF	Naivcla	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0924424-5
534	1760268	AMAN ULLAH	86.77	GPS BABAR KACHA	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-9678214-7
535	1763630	GHULAM ABBAS	88.23	GPS BABAR PAKKA	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0413474-5
536	1762943	MUHAMMAD AAMIR	83.89	GPS BABAR PAKKA	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-4243356-7
537	1760642	MUHAMMAD RAMZAN	85.4	GPS BASTI MALIK MIR	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-1470463-1
538	1760457	MUHAMMAD SHAFQAT	87.77	GPS BHIRKI	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-2526976-1
539	1763977	MUHAMMAD IMRAN	85.37	GPS HAZARA KACHA	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-7582792-7
540	1760566	HAMAD ULLAH	89.18	GPS JH; SALAUD DIN	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-6121532-1
541	1763279	GHULAM MURTAZA	97.63	GPS NO.1 PAROA	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-6724482-3
542	1760592	GHULAM YASIN	100.4	GPS NO.2 PAROA	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-2858944-9
543	1760407	INAM ULLAH	86.53	GPS NO.2 PAROA	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-2356055-5
544	1762676	MUHAMMAD KHALID	87.08	GPS NO.4 PAROA	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-1005269-1
545	1764238	SHAH NAWAZ	92.85	GPS NO.5 PAROA	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0930161-1
546	1761938	SAMI ULLAH	84.6	GPS NO.5 PAROA	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-2693445-1
547	1760563	RASHEED AHMAD	86.05	GPS THAT SOLAN	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-5965545-1
548	1760493	NAIMAT ULLAH	83.49	GPS CHEHKAN	Chehkan	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-8224182-1
549	1760901	HAFIZ MUHAMMAD TAHIR RASHID	100.25	GPS GARA AHMAD	Chehkan	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-4607199-9
550	1763522	ASIF NAWAZ	85.22	GPS GARA DAD	Chehkan	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-4701491-3
551	1760227	MUHAMMAD BILAL	111.67	GPS GARA MORE	Chehkan	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-7201439-7
552	1763614	MUHAMMAD YASIR KHAN	94.95	GPS NO. 1 POTA	Chehkan	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-4119138-3
553	1763177	TAHSEEN ULLAH	84.31	GPS SHERU KOHNA	Chehkan	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-5027815-5
554	1760400	MUHAMMAD QASIM MUDDASSIR	95.46	GMPS AYESHA MASJID NOW AT GPS FAQEER ABAD	DD# 1	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-5719694-9
555	1760649	NAJAM ALI	108.59	GMPS CHAH SARWAR NOW AT GPS CHAH BARAY WALA	DD# 1	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-0919804-9

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

[Handwritten signatures and initials]

19

Regularization Order PST/(NTS Adhoc) (2018) Dera Ismail Khan

Sr	RollNo	Name	Total Marks (out of 200)	School	UC	Appointment order No and dated	Extension order No and dated if any	CNIC
556	1762861	NAVEED AHMED	115.36	GPS BASTI DIRKHAN	DD# 1	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-6829025-5
557	1764205	NAJEEBULLAH KHAN	106.62	GPS CHAH BAREY WALA	DD# 1	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-0657930-9
558	1763898	MALIK MUHAMMAD ALTAF	83.63	GPS HASSA	DD# 2	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-6092352-5
559	1763869	ISHTEIAQ AHMED	105.22	GPS KACHI PAIND KHAN	DD# 2	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-9150160-1
560	1760472	MUHAMMAD TARIQ	100.98	GPS NO. 2 THOYA FAZIL	DD# 2	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-0958478-3
561	1760973	IHSAN ULLAH	88.57	GPS NO. 2 THOYA FAZIL	DD# 2	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-1599768-3
562	1763022	SAJID SOHAIL	89.38	GPS TAHIM ABAD	DD# 2	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-3633944-9
563	1760082	NADEEM IRFAN	107.87	GPS NAD ALI SHIAH	Deewala	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-0913321-7
564	1760632	IHSAN ULLAH	121.6	GPS BAHADARI	Giloti	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	35202-0244476-7
565	1762990	USMAN ALI	115.91	GPS NO. 1 GILOTI	Giloti	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12104-5727982-9
566	1760390	INAYAT ULLAH	109.68	GPS WANDA ABBU	Giloti	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-9123651-9
567	1760190	MUHAMMAD SALEEM	83.68	GPS AZIZ ABAD	Hissam	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-9168133-3
568	1760759	SHAFIQ UR REHMAN	89.25	GPS GARA RAHMAN	Hissam	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-4231644-3
569	1760638	GULISTAN	92.22	GPS NIAZI ABAD	Hissam	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-2489781-1
570	1760785	MUHAMMAD ARIF	80.16	GPS NIAZI ABAD	Hissam	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-1219968-1
571	1760332	ABDUL HAMEED	100.25	GPS SAGGU JANUBI	Hissam	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-6061024-9
572	1764113	MUHAMMAD ZUBAIR	79.71	GPS SOHLAN	Hissam	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-8537542-9
573	1760358	MUHAMMAD IMRAN	93.07	GPS WAZIR NAGAR	Hissam	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-8595425-1
574	1763138	FAIZ ABBAS	80.35	GPS JABAR WALA	Kech	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-7245184-5
575	1760138	MUHAMMAD IQBAL	109.74	GPS MAIZER ABAD	Kech	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-4387845-3
576	1762171	FAKHAR ZAMAN	81.51	GPS NO. 1 MUQEEM SHAH	Kech	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12103-1479851-1
577	1762399	MUHAMMAD ASLAM	73.61	GPS NO. 1 MUQEEM SHAH	Kech	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-3464719-1
578	1760450	MUHAMMAD ARSHAD IQBAL	108.82	GPS ARA	Kotla-Saidan	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-9695114-7
579	1760678	REHMAT ULLAH	104.49	GPS CHAH FAQEER WALA	Kotla Saidan	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-2909224-3
580	1762080	IKRAM ULLAH	89.45	GPS DIN PUR	Kotla Saidan	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-7026501-5
581	1760357	MUHAMMAD IMRAN	87.86	GPS DIN PUR	Kotla Saidan	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-4608343-7
582	1760992	MUHAMMAD TARIQ	87.39	GPS DIN PUR	Kotla Saidan	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-2733497-1
583	1762603	IMRAN KHAN NIAZI	110.03	GPS KAMRAN ABAD	Kotla Saidan	No. 23048-23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101-0960061-1

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

[Handwritten signatures and initials]

MINORITY QUOTA

Sr	RollNo	Name	Address	Total Marks [out of 200]	School	UC	Appointment order No and dated	Extension order No and dated if any	CNIC
1	2332000995	RISHI HANS	DIKhan	90.48	GPS NEW ABADI KOTLA SAIDAN	Kotla Saidan	No. 12081-12231 dated 05-05-2017		12101-8047233-5
2	2331000974	SHANKAR	DIKhan	88.76	GPS KHANA SHARIF	Lunda Sharif	No. 25757-67 dated 09-11-2017		12101-0970848-7

TERMS & CONDITIONS

- The regularization will not be in favour of those, who have not taken over charge or has remained absent from duty or resigned from service and also not for those who are under disciplinary proceedings.
- Their services shall be governed by the Khyber Pakhtunkhwa Civil Servants Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting & Transfer of Teachers, Lecturers, Instructors & Doctors) Regulatory Act, 2011, and such rules and regulations as may be issued from time to time by the government.
- Their pay shall be released subject to verification of academic documents/testimonials from the concerned Board/University by the District Education Officer Concerned.
- Their services shall be considered regular and they shall be eligible for pension/deduction of GP fund in terms of the Khyber Pakhtunkhwa Civil Servants Act, 1973 as amended in 2013.
- Their services are liable to termination on one month prior notice from either side. In case of resignation without notice, their one month pay/allowances shall be forfeited to the Government treasury.
- They shall possess the same qualification and experience required for a regular post.
- They shall have not resigned from their services or terminated from services on account of misconduct, inefficiency or any other ground before commencement of this ACT. The DDO concerned should ensure this condition before the draw of their pay as regular servants.
- Their regularization shall not affect the promotion quota of existing holders of posts in respective service cadres.
- The employees whose services are regularized under The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018) or in the process of attaining service at the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018) shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018); and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.
- Their seniority shall be determined on the basis of their continuous service in cadre, provided that if the date of continuous service in the case of two or more employees is the same, the employees older in age shall rank senior to the younger one.

Sd/-

(ATTA ULLAH KHAN MINA KHEL)
DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAI KHAN

Endst: No. 8712-10760 /Estt (Primary)

Dated DIKhan the 10/03 /2018

Copy forwarded for information and necessary action to the: -

- PS to the Secretary, to Govt: Khyber Pakhtunkhwa E&SE Department.
- Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- District Nazim DIKhan.
- Deputy Commissioner DIKhan.
- District Comptroller of Accounts DIKhan.
- Deputy District Education Officer (Male) DIKhan.
- All Sub-Divisional Education Officers (M) in District DIKhan.
- All Assistant Sub-Divisional Education Officers (M) Circles in District DIKhan.
- All Head Teachers Concerned.
- Teachers Concerned.
- Master File.

DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAI KHAN

M. ANWAR AWAN
Advocate Supreme Court
DIKhan.



GOVERNMENT OF KHYBER PAKHTUNKHWA
OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DERA ISMAIL KHAN

21

Ends: No. 11728-1 - C -

Dated: D.I. Khan the 04/06/2020

To

The Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar

Subject: GUIDANCE REGARDING SENIORITY LIST OF PST

Respected Sir,

It is stated for your kind information that a letter bearing No. 34832 dated 13/12/2019 on the subject cited above has been submitted to your good office but no guidance is provided in this regard till yet.

It is requested that seniority list of PST (NTS) is under process of updating now necessary guidance is required on the following points.

1. Whether the seniority list is updated according to merit score of the teachers or from their date of taking over charge and then on age.
2. In the year 2014, that appointments of PST (NTS) were made in two phases i.e. on May 2014 & December 2014. Whether these phases may be merged together and then determine their Seniority on otherwise.


DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN

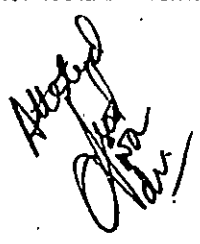
Ends: No. 11729-331


Dated: 04/06/2020

Copy for information to the:-

1. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. Deputy District Education Officer (Male) DIKhan.
3. All the SDEO's (Male) in District Dera Ismail Khan.
4. PA to DEO (Male) DIKhan.

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




DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN

22

~~Amme~~ D- (4)



**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.**

No. 6416 /F. No. Appeal D I Khan
Dated Peshawar the 24/6/2020.

To,

The District Education Officer (M)
D I Khan.

Subject: GUIDANCE REGARDING SENIORITY LIST OF PST.

Memo:-

I am directed to refer to your office letter No. 11728 dated 04.06.2020, on the subject cited above and to ask you to prepare seniority list of PSTs strictly in accordance with APT Rules 1989 and the KP Employees (Regularization of Service) Act 2018.

24/6/2020
Assistant Director (Estab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

Copy forwarded to the:-

1. P.A to Director Elementary and Secondary Education local office.

[Signature]
Assistant Director (Estab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

[Signature]
M. Anwar Awari
Advocate Supreme Court
D.I.Khan

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DERA ISMAIL KHAN

FINAL SENIORITY LIST OF PRIMARY SCHOOL TEACHERS (BPS 12) TO SENIOR PRIMARY SCHOOL TEACHERS (BPS 14)
 (DIRECT APPOINTMENT, APPOINTED THROUGH DECEASED SON / MEDICAL BOARD QUOTA AND NTS)

The committee consists of following members.

1. Mr. Muhammad Shafiq Principal, GCMHS No.1 D.I.Khan (Chairman)
2. Mr. Asim Saed Principal, GHS Himmat D.I.Khan (Member)
3. Mr. Muhammad Danish Roman Khan SST-IT, GHS No.5 D.I.Khan (Member)

The committee after consultation with the respective ASDEOs of all the 11 circles and SDEOs of five tchsils of District D.I.Khan, compiled the seniority list. The committee gave ample time for correction and modification of the list.

The concerned SDEOs have given certificates that if any discrepancy appears in the list they will be held responsible.

The list was formulated according to the policy, rules and regulations given by the office/directorate.

SERIAL NO	CNIC	NAME	FATHER NAME	DOMICILE	PRESENT PLACE OF POSTING	DATE OF BIRTH	DATE OF TAKING CHARGE	SCORE	TEHSIL	METHOD OF APPOINTMENT	REMARKS
1	12101-8104636-5	SHAH JAHAN	GUL DAD	DIK	GMPS JALAL BORING	17 Mar 1961	01 Feb 1979		DIKHAN	DIRECT APPOINTMENT	
2	12101-8000082-7	AZIZ ULLAH	SAAD ULLAH	DIK	GPS DIN PUR	20 May 1961	26 May 1982		DIKHAN	DIRECT APPOINTMENT	
3	12103-1490966-3	MUSHTAQ AHMAD	RAB NAWAZ	DIK	GPS MITHA PUR KALAN	10 Apr 1962	16 Dec 1982		PAHARPUR	DIRECT APPOINTMENT	
4	12103-1482132-1	ALLAH NAWAZ	MUHAMMAD NAWAZ	DIK	GPS KALA GORH	10 Sep 1962	17 Nov 1983		PAHARPUR	DIRECT APPOINTMENT	
5	12013-3841194-3	GHANI-UR-REHMAN	SHER DIL	DIK	GPS NO.1 PAHARPUR	01 Nov 1962	20 Dec 1983		PAHARPUR	DIRECT APPOINTMENT	
6	12101-0961741-7	ASEEM KHAN	AZAM KHAN	DIK	GPS GILOTI	01 May 1963	19 May 1984		DIKHAN	DIRECT APPOINTMENT	
7	12101-0965650-3	MUHAMMAD RASHID	GHULAM JEELANI	DIK	GPS KOKAR GHARBI	10 Sep 1961	05 Sep 1984		DIKHAN	DIRECT APPOINTMENT	
8	12102-2150050-7	ABDUL SAMAD KHAN	ABDUL GHAFAR	DIK	GPS BASTI BALOCHAN	28 Apr 1961	17 Oct 1984		DARABAN KALAN	DIRECT APPOINTMENT	
9	12101-0939011-5	ABDUL RASHID	INAM BAKHSII	DIK	GMPS HAZARA PAKKA	15 Oct 1963	17 Oct 1984		PAROVA	DIRECT APPOINTMENT	
10	12103-1501762-9	MUHAMMAD ABRAS SHAH	ABDUL HUSSAIN SHAH	DIK	GPS SAID ALIYAN	15 Apr 1965	17 Oct 1984		PAHARPUR	DIRECT APPOINTMENT	

23

Handwritten signature/initials

803	12101-6678663-9	SANA ULLAH	MUHAMMAD AFZAL	DIK	GPS JHOKE MUHAMMAD AMEEN	28 Jul 1987	17 May 2014	87.01	PAROVA	NTS	
804	12104-2926044-1	MUHAMMAD IRFAN	SHAMS UL HAQ	DIK	GMPS LANGER KOT	10 Sep 1988	17 May 2014	86.91	DARABAN KALAN	NTS	
805	12101-0779319-9	ABDUR RASHID	MUHAMMAD BARAAN	DIK	GPS JH KHALLAR N.A NO 2	02 Mar 1987	17 May 2014	86.90	PAROVA	NTS	
806	12101-0146539-9	MUHAMMAD SALEEM	MUHAMMAD RAMZAN	DIK	GPS NO 2 MANDHRA KALAN	14 Mar 1986	05 Dec 2014	86.79	DIKHAN	NTS	
807	12101-9678214-7	AMAN ULLAH	ALLAH BAKSH	DIK	GPS BABAR KACHA	04 Aug 1989	17 May 2014	86.77	PAROVA	NTS	
808	12101-5785994-9	MUHAMMAD ALTAF	HAQ NAWAZ	DIK	GPS RATTA KULACHI	10 May 1985	05 Dec 2014	86.74	DIKHAN	NTS	
809	12102-9415153-5	MUHAMMAD IKHLAS KHAN	HAMAYUN KHAN	DIK	GPS NO.1 MADDI	01 May 1992	05 Dec 2014	86.59	KULACHI	NTS	
810	12101-2356055-5	INAM ULLAH	RAHMAT ULLAH KHAN	DIK	GPS PAROVA NO 2	15 Aug 1986	17 May 2014	86.53	PAROVA	NTS	
811	J2101-7958647-3	ABDUL GHAFFAR	MALKOO	DIK	GPS JALALA	05 Mar 1987	17 May 2014	86.43	PAROVA	NTS	
812	12101-3625544-5	MUHAMMAD IMRAN	HUSSAIN BAKHSH	DIK	GPS HIMMAT WALA	01 Jan 1990	17 May 2014	86.30	DIKHAN	NTS	
813	12102-8220335-3	MUSHARRF UL REHMAN	AHMAD SAEED KHAN	DIK	GPS KOT TAGGA	12 Oct 1978	05 Dec 2014	86.28	DARABAN KALAN	NTS	
814	12104-7720484-1	SAEED UR REHMAN SHAH	ABDUR REHMAN SHAH	DIK	GPS BASTI BALOCHAN	25 Apr 1993	17 May 2014	86.25	DARABAN KALAN	NTS	
815	12101-5965545-1	RASHEED AHMAD	DUR MUHAMMAD	DIK	GPS THAT SOLAN	15 Apr 1984	17 May 2014	86.05	PAROVA	NTS	
816	12101-9096478-7	USMAN ALI KHAN	MUHAMMAD RIAZ KHAN	DIK	GPS MURYALI	06 Nov 1991	05 Dec 2014	86.05	DIKHAN	NTS	
817	12101-1122690-7	MUHAMMAD IQBAL	ILAHI BAKHSH	DIK	GPS NO 1 BUDH	03 Jan 1980	17 May 2014	85.83	DIKHAN	NTS	
818	12101-8850732-9	HABIB ULLAH	MIRAJ UD DIN	DIK	GPS NO 1 YARD	11 Mar 1989	17 May 2014	85.81	DIKHAN	NTS	
819	12101-6376869-7	UMER FAROOQ	GHULAM SADIQ	DIK	GPS CHAH LAL WALA	15 Sep 1985	05 Dec 2014	85.65	DIKHAN	NTS	
820	12101-0224342-3	MUHAMMAD MEHBOOB	AZIZ UR RHEMAN	DIK	GPS SULTANIA	16 Oct 1982	05 Dec 2014	85.52	DIKHAN	NTS	
821	12101-4704631-1	MUHAMMAD RAMZAN	MUHAMMAD BAKSH	DIK	GPS BASTI MALIK MEER	05 Apr 1982	17 May 2014	85.40	PAROVA	NTS	
822	12101-4965071-9	MUHAMMAD ZUBAIR	MUHAMMAD HASAN	DIK	GPS PAKKA MALANA	03 Mar 1989	17 May 2014	85.40	PAROVA	NTS	
823	12101-7582792-7	MUHAMMAD IMRAN	LAAL KHAN	DIK	GPS HAZARA KACHA	04 Jan 1990	17 May 2014	85.37	PAROVA	NTS	
824	12105-0347616-7	MUMTAZ AHMAD	GHULAM RASOOL	DIK	GPS TALAI BUDHA SHAH SHARQI	18 May 1992	17 May 2014	85.34	DARABAN KALAN	NTS	
825	12101-4701491-3	ASIF NAWAZ	ALLAH NAWAZ	DIK	GPS TUBE WELL NOOR ALAM	01 Apr 1994	05 Dec 2014	85.22	DIKHAN	NTS	

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

-25-

Handwritten signature/initials

826	12101-3815127-9	MUHAMMAD ISHFAQ	MALKA	DIK	GPS HIMMAT WALA	13 Feb 1987	05 Dec 2014	85.03	DIKHAN	NTS	
827	12104-2450301-9	IKRAM ULLAH	KHIDUA BAKHSH	DIK	GPS KOHAWAR	24 Apr 1988	17 May 2014	85.02	DARABAN KALAN	NTS	
828	12102-2131184-5	MUHAMMAD ISMAIL KHAN	AHMAD NAWAZ KHAN	DIK	GPS KOT MUSA	04 Apr 1982	17 May 2014	84.97	DARABAN KALAN	NTS	
829	12101-3610423-7	MUHAMMAD NUMAIR ADIL	MALIK INAYAT ULLAH	DIK	GPS KAT SHAHANI	02 Feb 1985	17 May 2014	84.78	PAROVA	NTS	
830	12101-5736347-3	MOHAMMAD YAQOOB	MUHAMMAD RAMZAN	DIK	GPS SARDARAY WALA	15 Mar 1989	17 May 2014	84.61	DIKHAN	NTS	
831	12101-2693445-1	SAMI ULLAH	QADIR BAKHSH	DIK	GPS PAROVA NO 5	02 Dec 1990	17 May 2014	84.60	PAROVA	NTS	
832	12104-3355116-7	MUHAMMAD AMJAD	ALAM SHER	DIK	GPS GARA RAMZI	01 Jan 1994	17 May 2014	84.60	DARABAN KALAN	NTS	
833	12101-4611793-9	BASHIR AHMAD	MUHAMMAD RAMZAN	DIK	GPS NO 3 KECH	07 Feb 1981	17 May 2014	84.37	DIKHAN	NTS	
834	12101-4466515-7	ABDUL QAYYUM	HAQNAWAZ	DIK	GPS RAMAK NO 1	20 Apr 1984	17 May 2014	84.32	PAROVA	NTS	
835	12101-5027815-5	TAHSEEN ULLAH	FAZAL AHMAD	DIK	GPS NO. 2 POTA	14 Aug 1992	05 Dec 2014	84.31	DIKHAN	NTS	
836	12102-5507317-1	MUHAMMAD TUFAIL	ABDUL LATIF	DIK	GPS SHAH ALAM	08 Jan 1993	17 May 2014	84.08	DARABAN KALAN	NTS	
837	12101-5753979-5	INTIZAR HUSSAIN	MUKHTIYAR HUSSAIN	DIK	GPS NAIVELA	25 Dec 1991	05 Dec 2014	83.96	PAROVA	NTS	
838	12101-6888027-9	ABDUR REHMAN	HOTE KHAN	DIK	GPS NO 2 JK/MOHANA	01 Mar 1984	17 May 2014	83.92	DIKHAN	NTS	
839	12101-4243356-7	MUHAMMAD AAMIR	MUHAMMAD RAMZAN	DIK	GPS BABBAR PAKKA	16 Mar 1990	17 May 2014	83.89	PAROVA	NTS	
840	12101-3594168-7	MAZHAR HUSSAIN	ASHIQ HUSSAIN	DIK	GPS MURYALI	07 Apr 1989	05 Dec 2014	83.85	DIKHAN	NTS	
841	12101-9261062-7	GHULAM SAMDANI	GHULAM RABBANI	DIK	GPS JAVED NAGGER	25 Feb 1981	17 May 2014	83.71	DIKHAN	NTS	
842	12101-2531840-9	MUHAMMAD IRFAN	ALLAH WASAYA	DIK	GPS WANDA BALOCH KOKAR	20 Feb 1989	05 Dec 2014	83.71	DIKHAN	NTS	
843	12101-9168133-3	MUHAMMAD SALEEM	YASEEN	DIK	GPS AZIZ ABAD	05 Jan 1989	05 Dec 2014	83.68	DIKHAN	NTS	
844	12102-4362397-9	SYED MUHAMMAD FARHAN SHAH	ABDUL MANAN SHAH	DIK	GPS BHUKKI	14 Apr 1991	17 May 2014	83.64	DARABAN KALAN	NTS	
845	12101-0992030-7	MUHAMMAD ISHAQ KHAN	AMAN ULLAH KHAN	DIK	GPS DHANDLAH	01 Mar 1981	05 Dec 2014	83.62	PAROVA	NTS	
846	12101-5653347-5	ZIA UR REHMAN	ATTA UR REHMAN	DIK	GPS IJAZ ABAD	01 Oct 1989	05 Dec 2014	83.59	DIKHAN	NTS	
847	12101-8224182-1	NAMAT ULLAH	MUHAMMAD AMEER	DIK	GPS NO. 1 HAJ MORAH	06 Jun 1984	05 Dec 2014	83.49	DIKHAN	NTS	
848	12101-0931619-7	SHAH RARAN	SHAH JAHAN	DIK	GPS SHEIKH YOUSAF	01 May 1979	05 Dec 2014	83.48	DIKHAN	NTS	

M. Anwar Awan
Advocate Supreme Court
Dhawan

Handwritten signature/initials

1194	12101-8047233-5	RISHI HANS	HEERA LAL	DIK	GPS NAT ABADI KOTLA SAIDAN	12 Jul 1996	05 May 2017	90.48	DIKHAN	NTS	
1195	12101-7464937-1	SHAFQAT ULLAH	MUHAMMAD AMEEN	DIK	GPS JEEWAYA SAHI	13 Aug 1988	27 Sep 2017	90.37	DIKHAN	NTS	
1196	12101-0970848-7	SHANKAR	MANNA LAAL	DIK	GPS KHANA SHARIF	04 Oct 1973	09 Nov 2017	88.76	PAROVA	NTS	
1197	12103-149344-1	SYED MUHAMMAD TAQI ZAIDI	SYED NASIR HUSSAIN ZAIDI	DIK	GPS AMIR SHAH	02 Feb 1977	22 Feb 2018		PAHARPUR	DECEASED SON / MEDICAL BOARD QUOTA	
1198	12101-7976492-5	MUHAMMAD SOHAIL	GHULAM FARID	DIK	GPS RATTA KULACHI	05 Mar 1980	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
1199	12101-9408976-3	KHURAM SHEHZAD	MUHAMMAD IBRAHIM	DIK	GPS AHEER ABAD	01 Apr 1984	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
1200	12101-8202352-1	ABDUR RASHID	ABDUR RAHIM	DIK	GPS GOMAL KHURD	31 Jan 1985	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
1201	12101-0808292-3	AFTAB MOHAYUD DIN	MOHAMMAD ASLAM	DIK	GPS SHEIKH RAJU	02 Apr 1985	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
1202	12101-5595268-1	MUHAMMAD ALI NUMAIR	SYED JAHANGIR ABBAS	DIK	G.P.S WANDA BALOCH KOKAR	21 Mar 1992	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
1203	12102-5739990-3	IRFANULLAH	FATEH ULLAH	DIK	GPS NO.2 KOT ESA KHAN	04 Oct 1993	22 Feb 2018		CHODWAN	DECEASED SON / MEDICAL BOARD QUOTA	
1204	12101-5310377-9	ALI JAMSHED	JAMSHED AHMAD	DIK	G.P.S SHAIKH YOUSAF	13 Feb 1994	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	

26-

CHAIRMAN: MUHAMMAD SHAFIQ _____

MEMBER 1: ASIM SAEED _____

MEMBER 2: MUHAMMAD DANISH ROOMAN _____

M. Anwar Awari
Advocate Supreme Court
DIKHAN



43

~~Annexure F~~

**OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
DERA ISMAIL KHAN**

27

Toll: 09669280128-09669280131
Email: emisdikhan@yahoo.com

Office No. 435/F-PST/DEO(M)

Dated DIKhan the 28/01 /2021

To

The Director
Elementary & Secondary Education
Department Khyber Pakhtunkhwa Peshawar.

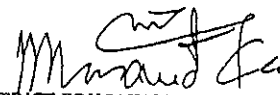
Subject: RESERVATION AGAINST THE SENIORITY LIST OF PST BS 12 (NTS 2014)

Memo:-

It is submitted that the some PSTs of district DIKhan have reservation over the seniority of list of PST (NTS) appointed on 17 May 2014 prepared on score basis vide your office No.6416/F-No. Appeal DIKhan dated Peshawar the 24 June 2020. Their reservations are as under:

1. PSTs were appointed in the 1st phase i.e. on 17/05/2014, whereas the deferred cases Teachers were appointed in the 2nd phase i.e. on 05/12/2014.
2. They have referred the Part-VI clause 17(a) of APT rules 1989 and clause 10 of the NTS teacher's regularization act of KP Assembly 2018, which emphasize the promotion will be based on date of 1st appointment (date of taking over charge) and then on age instead of score.
3. Some PSTs were appointed in the year 2017 & 2018 on regular basis on medical & deceased quota, they are given senior portion due to their regular appointment.
4. What will be position of promotees during year 2014 to 2018 who are working on regular basis?

It is requested that the necessary guidance from law department is required for permanent solution of this problem under the rules. The application along-with relevant documents are enclosed herewith for kind perusal please

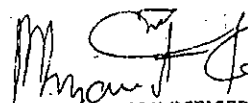

DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN

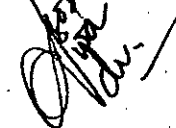
Office No. _____/F-PST

Dated DIKhan the ____/____/2021

Copy of above is forwarded for information to the:-

1. PS to Secretary E&SED Khyber Pakhtunkhwa Peshawar.
2. SDEOs (Male) Concerned in District DIKhan.
3. PA to DEO (Male) Dera Ismail Khan.
4. Office/Teachers Concerned.


DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN

Accepted


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

- 27A -

..... Better Copy.

**OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
DERA ISMAIL KHAN
Tell; 0966-9280128-09669280131
Email;emisdikhan@yahoo.com**

Endst; No. 435/F-PST/DEO(M) Dated DIKhan 08/01/2021.

To,

The Director,
Elementary & Secondary Education
Department Khyber Pakhtunkhwa Peshawar.

**SUBJECT:- RESERVATION AGAINST SENIORITY LIST OF PST BS
12 (NTS 2014).**

Memo;

It is submitted that the some PST's of district DIKhan have reservation over the seniority of list of PST (NTS) appointed on 17 May 2014 prepared on score basis vide your office No. 6416/F.No.Appeal DIKhan dated Peshawar the 24 June 2020. Their reservation are as under:

1. PST's were appointed in the 1st phase i.e on 17/05/2014, whereas the deferred cases Teachers were appointed in the 2nd phase i.e on 05/12/2014.
2. They have referred the Part-VI clause 17(a) of APT rules 1989 and clause 10 of the NTS Teacher's regularization act of KP Assembly 2018, which emphasize the promotion will be based on date of 1st appointment (date of taking over charge) and then on age instead of score.
3. Some PSTs were appointed in the year 2017 & 2018 on regular basis on medical and deceased quota, they are given senior portion due to their regular appointment.
4. What will be position of promotes during year 2017 to 2018 who are working on regular basis?

It is requested that the necessary guidance from law department is required for permanent solution of the problem under the rules. The application along with relevant documents are enclosed herewith for kind perusal please.

**District Education Officer
(Male) Dera Ismail Khan.**

Dated No. ____/F-PST dated DIKhan the ____/____/2021

Copy of above is forwarded for information to the:

1. PS to Secretary E&SED Khyber Pakhtunkhwa Peshawar.
2. SDEOs(Male) Concerned in District DIKhan.
3. PA to DEO(Male) Dera Ismail Khan.
4. Office / Teachers Concerned.

**District Education Officer
(Male) Dera Ismail Khan.**

449

28

District Education Officer Dera Ismail Khan

To,
The D.E.O,
D. I. Khan.

Subject: Reservation against the promotion order of PST (BPS12) to SPST(Bps14).

Respected Sir,

Most respectfully, It's stated that the KP Department of education advertised for the post of PST(BPS12) in December.

After the qualification of the test and criteria, we were appointed to the above-mentioned posts on 17 May 2014, but those who were found deficiencies like age problem, degree clearance, and result awaiting, were appointed six months later on 5 December 2014, in the second phase.

Another interesting thing is that the difference between 1st and 2nd phases (seniors and juniors) of six months was also maintained in both cases: awarding Increments and implementing permanency orders.

But when the promotion orders issued both seniors and juniors fall in one category and they promoted PSTs based on merit(NTS merit), which is a violation of KP assembly act 2018 and 1989 APT rule. As it is discussed in detail in the following line.

We put a humble request that as the case of promotion order of PSTs is concerned: KP assembly passed an act on Jan 8, 2018 and it's paragraph 4 part 2 states that seniority will be awarded to primary school teachers based on age and day of the appointment(a copy is attached with application).

*Received
04/11/21*

*Attested
M. Anwar
Adv.*

Office of 76
04/11/21
Diary No.

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

150

29

This act was also ratified in the elementary and secondary education notification related to the promotion order which was issued on 16 Feb 2018 in paragraph 2 part 1 (a copy is attached with application).

In the light of this act DEO of D. I. Khan issued an order for permanency, the article 10 of this order also emphasize that promotion will be held based on age and day of appointment as the KP assembly has passed the act (a copy is attached with application).

On 04/06/2020 District Education Officer submitted a letter regarding guidelines about seniority and promotion of PSTs to Director Education Khyber Pakhtunkhwa.

Later on, 24/06/2020 Director Education in answer to the said letter stated that the "promotion will be awarded based on the 1989 APT rule and the 2018 KP assembly act." (copy of both is attached).

Article 17 of APT states that "In the case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission 48 (or as the case may be, the Departmental Selection Committee;) provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a later selection; (a copy of which is attached).

Last but not the least, there are several paradoxes in the promotion orders of primary school teachers of NTS based 2014.

1st, the combined juniors, and seniors

and promoted them as a single badge but they were dealt differently in previous government activity (increment and permanency).

2nd, the promotion to the SSTs have been awarded on the basis of age while in case of PSTs, Here, rule is completely change.

3rd, it was clearly stated that promotions orders will be designed accordance to KP assembly act 2018 and 1989 APT rule but in practice they are disobeyed.

Therefore, we request in a humble manner that promotion orders should be redesigned according to KP act 2018 and 1989 APT rule.

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

Accepted
[Signature]

147

30

Dated: 04/01/2021

Copy is forwarded for information and necessary action to:

Director E&SED KP

Secretary Education Khyber Pakhtunkhwa

0343-2060989

- 1. صاحب سٹار فیس
- 2. سمن الزمان
- 22. اسرار احمد G.P.S گنجی
- 23. گاوتان G.P.S کمری ٹولہ
- 24. قمری لال G.P.S کلاور سٹریٹ
- 25. قمری چشتی G.P.S گندی علقی

- 1. ساجد اختر PST گورنمنٹ ہائر سکول پشاور
- 2. سید محمد صالح شاہ G.P.S پشور
- 3. محمد خالد خان G.P.S چاہ میاں
- 4. سعید حبیب G.P.S حسہ
- 5. اکمل الرحمن G.P.S کسٹم ہاؤس
- 6. سعید عامر G.P.S شاہ پور
- 7. خرم عامر (P.S.T) G.P.S NO:4
- 8. تیسق الرحمن (سمن شاہ G.P.S)
- 9. سعید ارس PST (گرہ نمود)
- 10. سعید احمد PST (G.P.S) مغربہ کنڈل
- 11. سعید احمد PST (G.P.S) گشتوری
- 12. سعید عرفان PST G.P.S گشتوری
- 13. سعید اسلم PST G.P.S جیو سکول پشور
- 14. سعید سعیدان PST گورنمنٹ ہائر سکول پشور
- 15. سعید سعیدان PST گورنمنٹ ہائر سکول پشور
- 16. سعید سعیدان PST گورنمنٹ ہائر سکول پشور
- 17. سعید سعیدان PST گورنمنٹ ہائر سکول پشور
- 18. سعید سعیدان PST گورنمنٹ ہائر سکول پشور
- 19. سعید سعیدان PST گورنمنٹ ہائر سکول پشور

03447523678
03440958675

Attended
M. Anwar
D.I. Khan

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

(181)

~~Annexure G~~

(31)



DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
GOVERNMENT OF PUNJAB, INDIA

101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000

The District Educational Officer,
Delalwara

Subject: RESERVATION AGAINST JULES KUMAR GUPTA (18/08/2011)

Memo: I am directed to refer your letter dated 13/08/2011 on the subject
concerning reservation against Jules Kumar Gupta (18/08/2011).

[Signature]
Assistant Director,
Elementary & Secondary Edu-
cation, District of Delalwara

Copy forwarded to the:

1. P.A. to District Elementary and Secondary Education Officer.

[Signature]
Assistant Director,
Elementary & Secondary Edu-
cation, District of Delalwara

[Handwritten signature]

— 31A —

..... Better Copy.

**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.**

No. _____/Appeal DIKhan
Date Peshawar the __/__/2021

To,

Th District Education Officer (M)
D.I.Khan.

**SUBJECT:- RESERVATION AGAINST THE SENIORITY LIST OF
PST BPS-12 (NTS 2014).**

Memo;

I am directed to refer your letter No. 435 dated
08/01/2021, as the subject cited above and to ask you
to deal the case at you own being a competent
authority.

**Assistant Director (Estab)
Elementary & Secondary Edu
Khyber Pakhtunkhwa, Peshawar.**

Copy forwarded to;

1. PA to Director Elementary and Secondary Education local office.

**Assistant Director (Estab)
Elementary & Secondary Edu
Khyber Pakhtunkhwa, Peshawar.**

- H -

5

32

D. No # 5184
22/03/21

To: The District Education Officer (Male) D. I. Khan

Received
22/03/21
District Education Officer
(Male) D. I. Khan

Subject: Appeal against the Seniority/promotion order of PST (BPS-12) to PST (BPS-14)

Respected Sir,

Most respectfully, it is stated that District Education Officer D. I. KHAN advertised for the post of PSTs (BPS-12) in January 2014.

After the qualification of the test and eligibility criteria, we were appointed to the above-mentioned posts on 17 May 2014, but those who were found ineligible due to deficiencies like age problem, degree verification, and result awaiting, were appointed six months later on 5 December 2014, in the second phase.

Another interesting fact is that the difference between 1st and 2nd phases (seniors and juniors) of six months was also maintained in both cases: awarding increments and implementing permanency orders.

But when the Seniority/promotion orders issued both seniors and juniors merged in one category and the Seniority/promotion of PSTs (recruited through NTS) made on the basis of score, which is contrary to the 2018 act of KP assembly and 1989 APT rule (Annex "A" & "B").

So we humbly request you that as the case of Seniority/promotion order of PSTs is covered:

Section 4(2) of KP Employees of E&SED (Appointment and Regularization of Services) Act states that: seniority of inter-se of those employees, whose services are regularized under this Act within the Cadre, shall be determined on the basis of their continuous service in Cadre, provided that if the date of continuous service in the case of two or more employees is same, the employee older in age shall rank senior to the younger one.

This act was also endorsed by the Elementary and Secondary Education Department notification related to the Seniority/promotion order which was issued on 16 Feb 2018 in paragraph 2 part 1(annex "C").

In the light of this act DEO D. I. Khan issued an order for permanency on 10/03/2018, the article 10 of this order also emphasize that Seniority/promotion will be granted on the basis of date of appointment and age as the KP assembly has passed the act (annex "D").

Accepted
D. I. Khan

On 04/06/2020 District Education Officer sought an advice regarding seniority and Seniority/promotion of PSTs to Director Education (E&SED) Khyber Pakhtunkhwa (annex "E")

Later on, 24/06/2020 Director Education in answer to the said letter stated that the "Seniority/promotion will be awarded based on the 1989 APT rule and the 2018 KP assembly act." (annex "E").

The sub section (4) of article (17) of CIVIL SERVANTS (APPOINTMENT, PROMOTION & TRANSFER) RULES, 1989 rules states that:

"The inter se-seniority of civil servants in a certain cadre to which promotion is made from different lower posts, carrying the same pay scale shall be determined from the date of regular appointment/promotion of the civil servants in the lower post.

Provided that if the date of regular appointment of two or more civil servants in the lower post is the same, the civil servant older in age, shall be treated senior."

Similarly, the seniority order list made by District Education Officer (DEO) Haripur, Khyber Pakhtunkhwa, is based on KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION & TRANSFER) RULES, 1989 and THE KHYBER PAKHTUNKHWA EMPLOYEES (REGULARIZATION OF SERVICES) ACT, 2018.

Last but not the least, there are several paradoxes in the Seniority/promotion orders of primary school teachers of NTS based 2014.

First of all from serial number 01 to serial number 203 seniority awarded on the basis of date of appointment and age while from serial number 204 to onward seniority awarded on the basis of score(marks) achieved in initial test.

There are several omissions in the seniority list of PSTs of district D I Khan.

The District Education Officer merged the juniors and seniors and promoted them as a single badge but they were dealt differently in previous government activity (increment and permanency).

The Seniority/promotion of the SSTs in the entire province, whether recruited through Commission or NTS, have been awarded on the basis of date of 1st appointment i.e. date of taking over charge and then on age while in case of PSTs. Here, the rule was completely ignored.

Attested
[Signature]

157

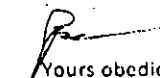
34

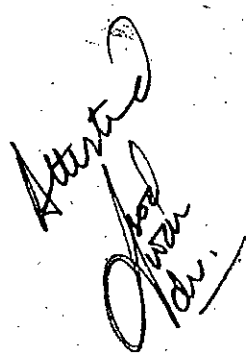
It was clearly stated that Seniority/promotions orders will be designed accordance to "THE KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, SENIORITY/PROMOTION & TRANSFER) RULES, 1989 and KP assembly act 2018 but in practice they are completely ignored.

Therefore, we humbly request you that Seniority/promotion orders should be cancelled & redesigned according to KP Assembly act 2018 and 1989 APT rule w. e. f. date of promotion order i.e. 08/12/2020.

We also have submitted the same application beforehand to your worthy office on dated: 04/01/2021.

Date: 15-03-2021


Yours obediently,
PSTs (List attached)
District: D. I. Khan



~~1~~

~~1~~

35

Dated: 02/01/2011

Copy is forwarded for information and necessary action to:

Director E&SED KP

Secretary Education Khyber Pakhtunkhwa

0343-2060489

- 1. صاحب شہار - ضلع پشاور
- 2. انسٹرکٹور جنرل G.P.S گوجی
- 3. گارڈین G.P.S کٹرہی گڑھی
- 4. انسٹرکٹور جنرل G.P.S کٹرہی گڑھی
- 5. انسٹرکٹور جنرل G.P.S کٹرہی گڑھی

- 1. صاحب شہار - ضلع پشاور
- 2. انسٹرکٹور جنرل G.P.S گوجی
- 3. گارڈین G.P.S کٹرہی گڑھی
- 4. انسٹرکٹور جنرل G.P.S کٹرہی گڑھی
- 5. انسٹرکٹور جنرل G.P.S کٹرہی گڑھی
- 6. انسٹرکٹور جنرل G.P.S کٹرہی گڑھی
- 7. انسٹرکٹور جنرل G.P.S کٹرہی گڑھی
- 8. انسٹرکٹور جنرل G.P.S کٹرہی گڑھی
- 9. انسٹرکٹور جنرل G.P.S کٹرہی گڑھی
- 10. انسٹرکٹور جنرل G.P.S کٹرہی گڑھی
- 11. انسٹرکٹور جنرل G.P.S کٹرہی گڑھی
- 12. انسٹرکٹور جنرل G.P.S کٹرہی گڑھی
- 13. انسٹرکٹور جنرل G.P.S کٹرہی گڑھی
- 14. انسٹرکٹور جنرل G.P.S کٹرہی گڑھی
- 15. انسٹرکٹور جنرل G.P.S کٹرہی گڑھی
- 16. انسٹرکٹور جنرل G.P.S کٹرہی گڑھی
- 17. انسٹرکٹور جنرل G.P.S کٹرہی گڑھی
- 18. انسٹرکٹور جنرل G.P.S کٹرہی گڑھی
- 19. انسٹرکٹور جنرل G.P.S کٹرہی گڑھی

0344 7523 678

0344 0458675

Attested
[Signature]

7 April 2011



SUPREME COURT BAR ASSOCIATION PAKISTAN



Sanaulah Shamim Gandapur Advocate

وکالت نامہ

ایک روپیہ قیمت

President Secretary

بعد ازاں جناب سروس ٹریبونل لیڈار

محمد رمضان بنام محمد رمضان

دعویٰ یا جرم اسل

تفصیل دعویٰ یا جرم

باعث تحریر آئٹم

مقدمہ میں حضور علیہ السلام میں اپنی طرف واسطے بیرونی وجوہات ہی برائے بڑی یا تصفیہ مقدمہ بمقام **تبرالہدسم ایڈووکیٹ محمد الفاضل اعوان ایڈووکیٹ** کیلئے

کے سب ذیل شرائط پر مکمل مقرر کیا ہے، کہ کشمیر پر قبضہ پر خود یا بذریعہ اختیار خاص روز بروز عدالت حاضر ہوتا رہا، گا اور ہر وقت ہر گز نہ جانے کہ مقدمہ مکمل صاحب موصوف کا اظہار ہو کر حاضر عدالت کریں گا، اگر قبضہ پر مظہر حاضر نہ ہوں اور مقدمہ سری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف نہ کیا تو صاحب موصوف اس کے اس طرح ذمہ داری ہوں گے، نیز مکمل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پچھے یا بروز تعطیل ہی وی کرنے کے ذمہ داری ہوں گے۔ نیز مکمل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پچھے یا بروز تعطیل ہی وی کرنے کے ذمہ داری ہوں گے اور مقدمہ صدر پکھری کے علاوہ اور جگہ سمیت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے پچھے پیش ہونے پر مکمل کو کوئی نقصان پہنچے تو اس کے ذمہ داری ہوں گے اور اس کے واسطے کسی معاوضہ کے ادا کرنے یا جمانے واپس کرنے سے بھی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو مکمل مانتے، راضی صاحب موصوف مکمل کردہ ذات خود منظور قبول ہوگا اور صاحب موصوف کو کاروباری دعویٰ یا جواب دہ ہوگا اور خواہ اس نے ڈگری ونگار جانی یا جلی و جرم، خواہ اس نے ونگار ونگار میں کرنے کی اجازت ہوگا اور کسی حکم یا ڈگری کرنے اور جرم کا رد یہ وصول کرنے اور جرم کے میان دینے اور اس پر مانتی یا راضی نامہ وصول کرنے والے ہوں گے۔ ہاں وہ اس کا بھی اختیار ہوگا اور صورت مقرر ہونے تاریخ قبضہ مذکورہ ہوں اور پکھری صدر ہی مقدمہ مذکورہ ہوں اور مانتی ونگار کی ویرا مانتی مقدمہ یا مشورہ ڈگری یا طرف یا درخواست حکم انتہائی یا ترقی یا اگر ڈگری یا از فیصلہ اجراء ڈگری بھی صاحب موصوف کو شرط طاعتی لکھنے و مانتی ہی کا اختیار ہوگا۔ صاحب موصوف مکمل کردہ ذات خود منظور قبول ہوں اور اس صورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ اس کے جرم کی کارروائی یا اس صورت درخواست نظر جانی یا ترقی یا اگر مانتی یا دیگر حالت مقدمہ مذکورہ کی دوسرے مکمل یا پھر شرط کا ہے جہاں سے ہر امر مقرر کریں اور اپنے شیر قانون کا بھی ہر امر میں وہی اور یہی اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جہاں، ہر جائے انعام پڑے گا، وہ صاحب موصوف کا حق ہوگا کہ صاحب موصوف کو پوری میں تاریخ قبضہ سے پہلے ادا نہ کریں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیرونی تکریر اور اس کی صورت میں ہر کوئی مطالبہ کسی قسم کا صاحب موصوف کے برعکس نہیں ہوگا۔

لہذا عدالت نامہ لکھنا یا نہ لکھنا ہے تاکہ مستند ہے

201

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

Handwritten signatures and text at the bottom left of the page.

PST محمد رمضان
M. Ram
0346-3545776

"A"

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

No.

APPEAL No. 7685 of 20 21

Muhammad Ramzan

Appellant/Petitioner

Versus

Govt of KP through Chief Secy

RESPONDENT(S)

Notice to Appellant/Petitioner ^{Counsel} Muhammad Anwar Awan

Advocate Supreme court
D-I Khan

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 14/1/22 at 9:00

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

(at Peshawar)

~~Registrar~~
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No. 7685 of 20 21

Muhammad Ramzan

Appellant/Petitioner

Versus

Govt. of KP through Chief Secy.

RESPONDENT(S)

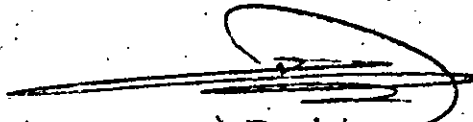
Notice to Appellant/Petitioner

Muhammad Ramzan PST G/PS
Basti Malik Meer Payova
D-I-Khan

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 14/1/22 at 4:am

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

at Peshawar


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

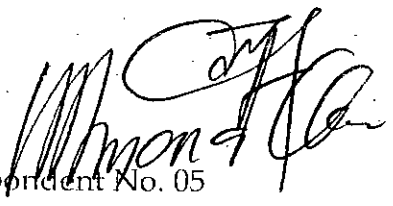
SERVICE APPEAL No. 7509/21

Syed Sohail Ahmad Shah Gillani & 33 ^{others} VS

Government of KPK

Index

S No.	Description of documents	Description of annuexure	Page No.
01	Reply of service appeal		1-4
02	Annexure		5-12
03	Affidavit		13
04	Authority		14


Respondent No. 05
District Education Officer
(Male) Dera Ismail Khan

S.A. no: 7685/2021

33 cases.

m. Ramzan

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

SERVICE APPEAL No. 7509/21

1. Syed Sohail Ahmad Shah Gillani & 33	VS	Government of KPK
2. Syed Shoaib Imran	VS	Government of KPK
3. Gulzar Khan	VS	Government of KPK
4. Zahir Hussain Shah	VS	Government of KPK
5. Sana Ullah	VS	Government of KPK
6. Nisar Mehmood Khan	VS	Government of KPK
7. Mazar Iqbal	VS	Government of KPK
8. Habib Ur Rehman	VS	Government of KPK
9. Abdul Latif	VS	Government of KPK
10. Syed Gulam Abbas	VS	Government of KPK
11. Kifayat Ullah	VS	Government of KPK
12. Muhammad Bilal	VS	Government of KPK
13. Kifayat Ullah	VS	Government of KPK
14. Muhammad Latif	VS	Government of KPK
15. Muhammad Ali	VS	Government of KPK
16. Abdul Qayyum	VS	Government of KPK
17. Muhammad Asghar	VS	Government of KPK
18. Sami Ullah	VS	Government of KPK
19. Muhammad Amir	VS	Government of KPK
20. Aman Ullah	VS	Government of KPK
21. Rasheed Khan	VS	Government of KPK
22. Rab Nawaz	VS	Government of KPK
23. Ghulam Samdani	VS	Government of KPK
24. Imdad Hussain	VS	Government of KPK
25. Ihsan Ullah	VS	Government of KPK
26. Muhammad Zarif	VS	Government of KPK
27. Rehmat Ullah	VS	Government of KPK
28. Abdul Ghafoor	VS	Government of KPK
29. Haji Ahmad	VS	Government of KPK
30. Imdad Hussain	VS	Government of KPK
31. Akhtar Munir	VS	Government of KPK
32. Abu Nasar Muhammad Parsa	VS	Government of KPK

COMMENTS ON BEHALF OF RESPONDENTS.

PRELIMINARY OBJECTIONS

1. That the Departmental Appeal is Badly time barred.
2. The respondent no. 5 issued the seniority list of PST Teachers on 04-06-2020 where as the appellants filed the departmental appeals on 15-03-2021. So the appellants have no cause of action and locus standi.

3. that the appellants has not come to the honorable tribunal with clean hands.
4. That the appellants has filed the service appeals on malafide objectives.
5. that the instant appeal are against the prevailing laws and rules.
6. That the appeal are barred by the doctrine of laches.
7. That the instant appeal are illegal and against the facts.
8. That the service appeal are not maintainable in its present form.
9. That the appellants has concealed the material facts from the honorable tribunal.
10. That the appeals are badly time barred.

Handwritten signature
(6/6/2022)

Respectfully Sheweth , Reply on behalf of Respondent No.5. DEO (M)

D.I.Khan

Respected Sir, The respondent No.5 humbly submits as under

Factual objections

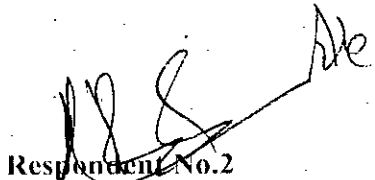
1. Para pertains to the appointment of appellants on 17-05-2014 and respondents appointments on 05-12-2014.
2. Para pertains to the regularization of appellants on 10-03-2018.
3. Para pertains to the seniority list of appellants issued by DEO (M) D I Khan. On 04-06-2020. Where as the departmental appeals were filed on 15-03-2021. Which are time barred.
4. Incorrect/ not admitted. Para is strongly denied and refuted. The seniority was prepared on merit position and score/ Academic Record not basis of first appointment orders. As the respondent no. 11 to 17 were high in merit and score as compare to the appellants. So they were (Respondents) were senior seniority list of PST Teachers as compare to the appellants.
(Annexure A)
5. Incorrect / not admitted. Para is strongly denied. Now the General rule for promotion in Education Department is not to consider the length of Service but the merit formula and score in academic record.
6. Para pertains to the reservations on seniority list. Hence on comments.
7. Para pertains to the departmental appeals which were badly time barred.
8. No comments.

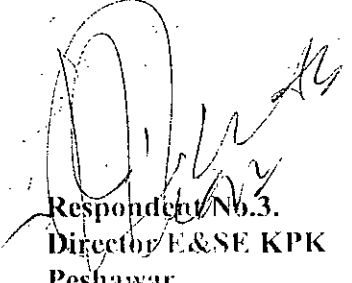
Grounds

1. Incorrect / not admitted; para is strongly denied. The act of respondents was according to law, with law full jurisdiction.
2. Incorrect / not admitted. The seniority list of all PST teachers was prepared on merit and their seniority list will be determined on their merit position. Not based on first appointments orders.
3. Incorrect / not admitted. As replied above.
4. Incorrect/ not admitted. The seniority list of all PST was prepared on merit and academic record not first appointment orders.
5. Incorrect / not admitted. As discussed above.
6. That the counsel of appellant may please to allowed to raise additional grounds during the course of arguments

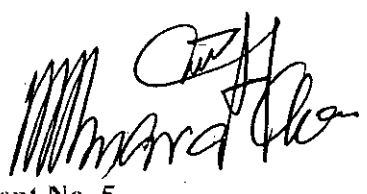
So it is humbly prayed that appeal of appellant may kindly be dismissed with Cost.

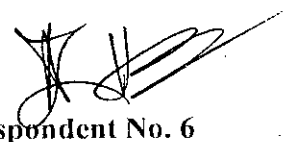
Respondent No.1
The Chief Secretary E&SE KPK
Peshawar

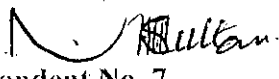

Respondent No.2
The Secretary E&SE KPK
Peshawar

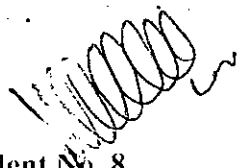

Respondent No.3.
Director E&SE KPK
Peshawar


Respondent No. 4
Assistant Director Estab KP
Peshawar

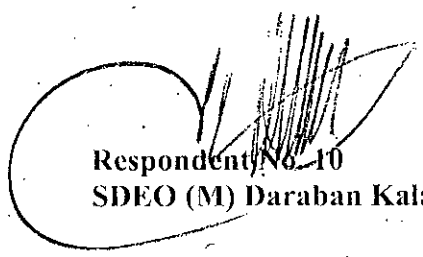

Respondent No. 5
District Education Officer
(M) D I Khan


Respondent No. 6
SDEO (M) D I Khan


Respondent No. 7
SDEO (M) Paharpur D I Khan



Respondent No. 8
SDEO (M) Kulachi D I Khan


Respondent No. 9
SDEO (M) Parova D I Khan


Respondent No.10
SDEO (M) Daraban Kalan D I K

Submitted for vetting S-Sohail along with 33 being same
M-Kamran Khan and identical nature.
06.8.2022. M^{07/22}

Vetted subject to necessary correction, attachment
of annexures and affidavit.


6/6/2022



OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN

Tell: 09669280128- 09669280131.

Email: emisdik@gmail.com

NOTIFICATION:

The competent authority is pleased to notify the final seniority list of the PST's teacher working in different GPS of District DIKhan under District Education Officer (Male) Dera Ismail Khan as stood on August 31, 2020 for information of the all concerned.

Sd/-

District Education Officer
(Male) Dera Ismail Khan

Endst: No. 20489-96 /ADEO(Estab; Pry) Dated D.I.Khan the: 14 / 10 /2020.

Copy forwarded for information to the:

1. PS to Secretary Elementary & Secondary Education KP, Peshawar.
2. Director Elementary & Secondary Education KP, Peshawar.
3. Deputy District Education Officer (Male) Dera Ismail Khan
4. All SDEO's (Male) in District Dera Ismail Khan
5. All ADEO's / ASDEO's (Male) in District Dera Ismail Khan
6. PA to District Education Officer (Male) Dera Ismail Khan
7. All the teachers concerned
8. Office Record


District Education Officer
(Male) Dera Ismail Khan

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DERA ISMAIL KHAN

**FINAL SENIORITY LIST OF PRIMARY SCHOOL TEACHERS (BPS 12) TO SENIOR PRIMARY SCHOOL TEACHERS (BPS 14)
(DIRECT APPOINTMENT, APPOINTED THROUGH DECEASED SON / MEDICAL BOARD QUOTA AND NTS)**

The committee consists of following members.

1. Mr. Muhammad Shafiq Principal, GCMHS No.1 D.I.Khan (Chairman)
2. Mr. Asim Saeed Principal, GHS Himmat D.I.Khan (Member)
3. Mr. Muhammad Danish Roman Khan SST-IT, GHS No.5 D.I.Khan (Member)

The committee after consultation with the respective ASDEOs of all the Ti circles and SDEOs of five tehsils of District D.I.Khan, compiled the seniority list. The committee gave ample time for correction and modification of the list.

The concerned SDEOs have given certificates that if any discrepancy appears in the list they will be held responsible.

The list was formulated according to the policy, rules and regulations given by the office/directorate.

SERIAL NO.	CNIC	NAME	FATHER NAME	DOMICILE	PRESENT PLACE OF POSTING	DATE OF BIRTH	DATE OF TAKING CHARGE	SCORE	TEHSIL	METHOD OF APPOINTMENT	REMARKS
P.M.	12101-8104636-5	SHAH JAHAN	GUL DAD	DIK	GMPS JALAL BORING	17 Mar 1961	01 Feb 1979		DIKHAN	DIRECT APPOINTMENT	
P.M.	12101-8000082-7	AZIZ ULLAH	SAAD ULLAH	DIK	GPS DIN PUR	20 May 1961	26 May 1982		DIKHAN	DIRECT APPOINTMENT	
SSC	12103-1490966-3	MUSHTAQ AHMAD	RAB NAWAZ	DIK	GPS MITHA PUR KALAN	10 Apr 1962	16 Dec 1982		PAHARPUR	DIRECT APPOINTMENT	
SSC	12103-1482132-1	ALLAH NAWAZ	MUHAMMAD NAWAZ	DIK	GPS KALA GORH	10 Sep 1962	17 Nov 1983		PAHARPUR	DIRECT APPOINTMENT	
FA	12013-3841194-3	GHANI-UR-REHMAN	SHER DIL	DIK	GPS NO.1 PAHARPUR	01 Nov 1962	20 Dec 1983		PAHARPUR	DIRECT APPOINTMENT	
SSC	12101-0961741-7	ASEEM KHAN	AZAM KHAN	DIK	GPS GILOTI	01 May 1963	19 May 1984		DIKHAN	DIRECT APPOINTMENT	
FA	12101-0965650-3	MUHAMMAD RASHID	GHULAM JEELANI	DIK	GPS KOKAR GHARBI	10 Sep 1961	05 Sep 1984		DIKHAN	DIRECT APPOINTMENT	
P.M.	12102-2150050-7	ABDUL SAMAD KHAN	ABDUL GHAFAR	DIK	GPS BASTI BALOCHAN	28 Apr 1961	17 Oct 1984		DARABAN KALAN	DIRECT APPOINTMENT	
SSC	12101-0939011-5	ABDUL RASHID	IMAM BAKHSH	DIK	GMPS HAZARA PAKKA	15 Oct 1963	17 Oct 1984		PAROVA	DIRECT APPOINTMENT	
SSC	12103-1501762-9	MUHAMMAD ABBAS SHAH	ABBUL HUSSAIN SHAH	DIK	GPS SAID ALIYAN	15 Apr 1965	17 Oct 1984		PAHARPUR	DIRECT APPOINTMENT	

207	12101-0978280-3	SAADULLAH KHAN	HABIB ULLAH KHAN	DIK	GPS NO. 9 DIKHAN	10 Jan 1976	05 Dec 2014	130.48	DIKHAN	NTS
208	12102-2620619-1	ABRAR AHMAD	NISAR AHMAD	DIK	GPS NO. 4 DARABAN KALAN	01 Apr 1983	17 May 2014	129.42	DARABAN KALAN	NTS
209	12102-3786840-3	SHAFQAT ULLAH KHAN	BARKATULLAH KHAN	DIK	GPS HATHALA	04 Aug 1985	17 May 2014	129.22	KULACHI	NTS
210	12103-3730498-5	LIAQAT HUSSAIN KHAN	KHADIM HUSSAIN KHAN	DIK	GPS BAND KURAI	14 Aug 1981	17 May 2014	129.02	PAHARPUR	NTS
211	12101-6238687-7	IRSHAD ULLAH	MUHAMMAD IQBAL	DIK	GPS NO 1GILQTI	11 Dec 1987	17 May 2014	128.85	DIKHAN	NTS
212	12101-4778025-1	MUHAMMAD FAHEEM	SALIM NAWAZ	DIK	GPS BEHARI COLONY	14 Jan 1988	17 May 2014	128.69	DIKHAN	NTS
213	12101-2334729-5	NAQEEB ULLAH	ABDUL LATIF	DIK	GPS WANDA HAIBATTI	15 Mar 1984	17 May 2014	128.47	DIKHAN	NTS
214	12103-6465101-9	MUHAMMAD BILAL	ABDUR REHMAN	DIK	GPS NO.2 PAHARPUR	06 Jan 1986	17 May 2014	128.28	PAHARPUR	NTS
215	12102-8779268-1	HIZBULLAH KHAN	MUHAMMAD ABBAS KHAN	DIK	GPS NO.1 TAKWARA	20 Apr 1987	05 Dec 2014	128.25	KULACHI	NTS
216	12103-7927358-5	MUHAMMAD IRFAN	BASHIR AHMAD	DIK	GPS RANG PUR SHUMALI	09 Dec 1984	17 May 2014	127.91	PAHARPUR	NTS
217	12103-5196931-7	MUHAMMAD SHOAIB KHAN	SYED RIAZ HUSSAIN SHAH	DIK	GPS NO. 2 DHALLAH	24 Apr 1981	05 Dec 2014	127.84	PAHARPUR	NTS
218	12103-5436677-1	MUHAMMAD SHOAIB KHAN	IBRAHIM KHAN	DIK	GPS WANDA NARKANI	04 Feb 1993	17 May 2014	127.73	PAHARPUR	NTS
219	11201-6609430-1	ASSAD HUSSAIN SHAH	MASROOR HUSSAIN SHAH	DIK	GPS WANDA TALGI	19 Sep 1989	05 Dec 2014	127.55	PAHARPUR	NTS
220	12101-3032309-7	MUHAMMAD YOUNIS	MUHAMMAD RAMZAN	DIK	GPS KPK	10 Apr 1982	17 May 2014	127.49	DIKHAN	NTS
221	12103-1501335-9	ABDUR RAUF KHAN	MAAZ ULLAH KHAN	DIK	GPS KOT MASOODAN	02 Jan 1977	05 Dec 2014	126.77	PAHARPUR	NTS
222	12101-3144698-1	ISRAR MUHAMMAD	MUHAMMAD BAKHSH	DIK	GPS JHOKE GUMLA	16 Mar 1985	17 May 2014	126.62	PAROVA	NTS
223	12103-1502464-7	QAZI MUHAMMAD ABDUL WAHAB	QAZI KHIZAR HAYAT	DIK	GPS HAFIZ ABAD	25 Feb 1986	17 May 2014	126.23	PAHARPUR	NTS
224	12105-0354017-3	RIAZ ALI KHAN	ANIAZ ALI KHAN	DIK	GPS RAMAK NO 1	15 Sep 1990	17 May 2014	125.50	PAROVA	NTS
225	12101-2071864-1	SHOAIB UR REHMAN	GHULAM SUBHANI	DIK	GPS GARA RASHEED	03 Dec 1985	17 May 2014	125.38	PAROVA	NTS
226	12101-8953208-5	MUHAMMAD ZUBAIR	MUHAMMAD JAVEED	DIK	GPS BALOCH NAGAR	20 Dec 1985	17 May 2014	124.54	DIKHAN	NTS
227	12101-5048995-5	HIDAYAT ULLAH	MUHAMMAD AFZAL	DIK	GPS BUCHRI	03 Jul 1987	17 May 2014	124.50	PAROVA	NTS
228	12103-6391600-7	MUHAMMAD TARIQ	ABDUL QAYYUM	DIK	GPS ASIF ABAD	03 Sep 1988	17 May 2014	124.29	PAHARPUR	NTS
229	12102-2136771-9	IMRAN ULLAH	ABDUL WAHAB	DIK	GPS BEHLOL KHEL	10 Feb 1980	17 May 2014	123.87	KULACHI	NTS

[Handwritten signature]

[Handwritten signature]

230	12103-3750799-1	NAZIR AHMAD KHAN	MUHAMMAD KHAN	DIK	GPS HASSANI KHEL	10 Mar 1988	17 May 2014	123.85	PAHARPUR	NTS
231	12101-8111998-7	MUHAMMAD ZAFFAR	ALLAH BAKHSH	DIK	GPS MANDHRA SAIDAN	07 May 1976	05 Dec 2014	123.69	DIKHAN	NTS
232	12103-2562738-1	MUHAMMAD IMRAN	SHER MUHAMMAD	DIK	GPS RAJAN PUR	10 Mar 1991	17 May 2014	123.55	PAHARPUR	NTS
233	12101-0991881-9	MUHAMMAD IBRAHIM	MOLVI IMAM BAKHSH	DIK	GPS JATTA	02 Jul 1984	17 May 2014	123.29	PAROVA	NTS
234	12103-0447973-9	MUHAMMAD QAYYUM	ROZI KHAN	DIK	GPS TOBA	25 Apr 1983	17 May 2014	122.17	PAHARPUR	NTS
235	12103-9464400-9	MUHAMMAD IRFAN	MUHAMMAD RAMZAN	DIK	GPS NO.2 PAHARPUR	14 May 1986	17 May 2014	122.07	PAHARPUR	NTS
236	12103-5710032-5	SARDAR KHAN	ABDUL SATTAR KHAN	DIK	GPS KHOKHAR	03 Jul 1981	17 May 2014	122.05	PAHARPUR	NTS
237	12101-9375468-1	FAZAL UR RAHIM	ABDUR RAHEEM	DIK	GPS NO 2 GILOTI	15 Mar 1985	17 May 2014	121.91	DIKHAN	NTS
238	12101-9315198-9	SYED ZAJGHAM ABBAS SHAH	GHULAM RASOOL	DIK	GPS KACHA MALLANA NO1	02 Aug 1986	17 May 2014	121.90	PAROVA	NTS
239	12104-6105338-3	SAMI ULLAH	HIDAYAT ULLAH	DIK	GPS NO. 1 MUSAZAI	21 Apr 1992	17 May 2014	121.49	DARABAN KALAN	NTS
240	12101-9631824-1	MUHAMMAD ZULQARNAIN HAIDER	SAIF UR REHMAN	DIK	GPS.NO 6 DIKHAN	01 Apr 1988	05 Dec 2014	121.45	DIKHAN	NTS
241	12104-0478550-3	AMIR HAMZA	MAQBOOL AHMAD	DIK	GPS KHIARA FATEH MUHAMMAD	13 May 1987	17 May 2014	121.39	DARABAN KALAN	NTS
242	12101-9086383-7	MUHAMMAD ARSHAD	MUHAMMAD JAAN	DIK	GPS KURAI	03 Feb 1989	17 May 2014	121.37	DIKHAN	NTS
243	12101-4770275-3	MUHAMMAD SHAFIQ	ABDUL LATIF	DIK	GPS TEEKIN	02 Jan 1988	17 May 2014	121.17	DIKHAN	NTS
244	12103-8409583-7	HAFEEZ ULLAH	GHULAM YASIN	DIK	GPS CHAH MUNDHR WALA	10 Sep 1984	17 May 2014	119.97	PAHARPUR	NTS
245	12103-8705620-7	MOHAMMAD ARIF	ABDUL ALEEM	DIK	GPS KURRAR	02 Feb 1980	17 May 2014	119.96	PAHARPUR	NTS
246	12101-5983191-5	MUHAMMAD IQBAL	BASHEER AHMAD	DIK	GPS JHOKE JHEDA	04 Sep 1984	05 Dec 2014	119.96	PAROVA	NTS
247	12101-7337152-1	MUHAMMAD ASIF	GUL SHER	DIK	GPS WAJHUN	15 Feb 1982	17 May 2014	119.93	PAHARPUR	NTS
248	12103-5734305-9	JAVED KHAN	SONA KHAN	DIK	GPS BILOT SHARIF	06 Sep 1985	17 May 2014	119.89	PAHARPUR	NTS
249	12101-1764785-7	MUHAMMAD SHOAIB	FAIZ MUHAMMAD	DIK	GPS MOGA	10 Jan 1988	17 May 2014	119.75	DARABAN KALAN	NTS
250	12101-7534975-9	AURANGZEB	MUHAMMAD SHAFI	DIK	GPS BEHARI COLONY	12 Sep 1985	17 May 2014	119.54	DIKHAN	NTS
251	12101-5594929-7	MUHAMMAD SHAKEEL	KHALIL AHMAD	DIK	GPS SULTANIA	12 Apr 1990	17 May 2014	119.47	DIKHAN	NTS
252	12104-2596828-3	MUHAMMAD JAMSHED	AMIR MUHAMMAD	DIK	GPS NO. 1 KIRI SHAMOZAI	18 Jan 1988	17 May 2014	119.38	DARABAN KALAN	NTS

12101-6127838-1	MUHAMMAD MATI ULLAH	AHMAD SAEED	GPS BEHARI COLONY	20 Feb 1984	17 May 2014	119.27	DIKHAN	NTS
12102-8432598-3	HAFIZ UR REHMAN	FAZAL REHMAN	GPS NO.3 MADDI	07 Apr 1989	17 May 2014	119.23	KULACHI	NTS
12103-5723200-1	ABDUL GHAFAR	MUHAMMAD HUSSAIN	GPS CHAH LADHA	13 Mar 1986	17 May 2014	119.10	PAHARPUR	NTS
12102-4897404-1	MUHAMMAD IMRAN	SONA KHAN	GPS NO.2 KULACHI	02 Jul 1985	17 May 2014	119.03	KULACHI	NTS
12102-1414606-5	NAEEM SHAH	HAKHEEM SHAH	GPS NO. 4 DARABAN KALAN	15 Dec 1982	17 May 2014	118.86	DARABAN KALAN	NTS
12103-8642875-1	MUHAMMAD RIAZ UR REHMAN	SAHIB JAN	GPS WANDHA YARIK	09 Nov 1988	17 May 2014	118.83	PAHARPUR	NTS
12103-0254015-9	GHULAM SAMDANI	RAZA MUHAMMAD	GPS MADI KHEL	17 Aug 1986	17 May 2014	118.62	PAHARPUR	NTS
12102-4302096-3	MUHAMMAD RIAZ	HUSSAIN BAKHSH	GMPS G.RABNAWAZ	19 Feb 1984	17 May 2014	118.57	KULACHI	NTS
12103-5462943-1	MUHAMMAD ALI	RAIS KHAN	GPS WANDA LALI	09 Jan 1985	17 May 2014	118.30	PAHARPUR	NTS
12103-8486125-7	MUHAMMAD IRFAN ULLAH	GUL BADSHAH	GPS WANDA LALI	04 Jan 1991	17 May 2014	118.06	PAHARPUR	NTS
12103-2043062-1	KAMRAN ALI	GHULAM HASSAN	GPS NO.1 PAHARPUR	03 Dec 1984	17 May 2014	117.75	PAHARPUR	NTS
12103-8169823-5	MUHAMMAD ZEESHAN AHMAD	AHMAD NAWAZ	GPS NO.1 PAHARPUR	20 Apr 1987	17 May 2014	117.63	PAHARPUR	NTS
12101-3036696-5	RIZWAN ULLAH	SHOUKAT ULLAH	GPS NO.1 ABDUL KHEL	03 Jan 1990	17 May 2014	117.53	PAHARPUR	NTS
12104-8852999-9	MUHAMMAD KAMRAN	MULAZIM HUSSAIN	GPS MOCHIWAL	03 Mar 1986	17 May 2014	117.24	DARABAN KALAN	NTS
12102-1611179-5	ZAKAULLAH KHAN	ATTA ULLAH KHAN	GPS NO. 1 KOT SHAHNAWAZ	30 Apr 1985	17 May 2014	117.20	DARABAN KALAN	NTS
12101-7896018-1	HAJI DILAWAR KHAN	HAJI MIRZA KHAN	GPS KHUTTI	24 Apr 1989	17 May 2014	116.88	DIKHAN	NTS
12102-5672976-7	HAIBAT KHAN	MUHAMMAD AMEER KHAN	GPS NO.1 KULACHI	11 Feb 1982	17 May 2014	116.83	KULACHI	NTS
12103-0244340-7	MUHAMMAD JABBAR	GHULAM RASOOL	GPS KACHA MALI KHEL	30 Oct 1988	17 May 2014	116.82	PAHARPUR	NTS
12103-4018813-1	GUL NAWAZ	MUSA KHAN	GPS NO.1 ABDUL KHEL	15 Mar 1984	17 May 2014	116.81	PAHARPUR	NTS
12102-2134578-7	TAHIR KHAYYAM	TAUS KHAN	GPS NO.1 KULACHI	16 Feb 1983	17 May 2014	116.75	KULACHI	NTS
12101-3958240-7	ABDUL BASAT	MAULVI GHULAM HASSAN	GPS KOT ESSA KHAN	02 Jan 1992	17 May 2014	116.49	DIKHAN	NTS
12101-0924424-5	MUSHTAQ AHMAD	JUMMA KHAN	GPS KHANA SHARIF	02 Jan 1980	17 May 2014	116.40	PAROVA	NTS
12101-7034423-1	MUHAMMAD RAMZAN	SHER ZAMAN	GPS GARA MORE	05 Mar 1981	17 May 2014	116.35	DIKHAN	NTS

276	12103-6799253-7	MUHAMMAD ZUBAIR KHAN	ABDUL SATTAR KHAN	DIK	GPS WANDA UMARI	03 Feb 1986	17 May 2014	116.33	PAHARPUR	NTS
277	12103-8271339-1	MUHAMMAD YOUNAS	GANMON	DIK	GPS NO 1 UMRAY WALI	03 Mar 1987	17 May 2014	116.25	PAHARPUR	NTS
278	12103-6940574-7	TAHIR KHAN	HAJI NADIR KHAN	DIK	GPS NO.1 PAHARPUR	25 Mar 1992	17 May 2014	116.13	PAHARPUR	NTS
279	12101-5583256-9	SANA ULLAH	MUHAMMAD HANIF	DIK	GPS JK/ QURESHIAN	23 Mar 1987	17 May 2014	115.87	DIKHAN	NTS
280	12101-8289665-1	ASIF ULLAH	GHULAM JAN	DIK	GPS WANDA HAIBATTI	04 Feb 1988	17 May 2014	115.70	DIKHAN	NTS
281	12101-0924552-5	ALLAH BAKHSH	SARDAR BAKHSH	DIK	GPS JHOKE TARHELI NO.02	26 May 1983	17 May 2014	115.55	PAROVA	NTS
282	12101-7341749-1	MUHAMMAD YASEEN	MUHAMMAD AMIN	DIK	GPS NO.10 DIK	20 Sep 1972	17 May 2014	115.49	DIKHAN	NTS
283	12103-3921303-3	SHOUKAT ULLAH	GHULAM MUHAMMAD	DIK	GPS UDWAL	07 Apr 1990	17 May 2014	115.46	PAHARPUR	NTS
284	12101-6829025-5	NAVEED AHMED	ABDUL MAJID	DIK	GPS BASTI DIRKHAN	15 Apr 1985	05 Dec 2014	115.36	DIKHAN	NTS
285	12103-7312799-1	GHULAM MOHAY UD DIN	MUHAMMAD RAMZAN	DIK	GPS BHITANIAN	01 Nov 1984	05 Dec 2014	115.08	PAHARPUR	NTS
286	12102-9927407-1	MUHAMMAD KHALID	ABDUL MAJEED	DIK	GPS NO.3 MADDI	20 Jan 1988	17 May 2014	115.05	KULACHI	NTS
287	12103-1413344-3	SHEIKH JAWAD AHMAD	SHAIKH RIAZ AHMAD	DIK	GPS CHISTIA RIZWIA PHP	31 Dec 1987	17 May 2014	115.02	PAHARPUR	NTS
288	12103-9151950-7	MUHAMMAD ARIF	GHULAM HUSSAIN	DIK	GPS BILOT SHARIF	20 Mar 1983	17 May 2014	114.89	PAHARPUR	NTS
289	12103-1779028-7	MUHAMMAD BILAL	RAB NAWAZ	DIK	GPS TOBA	01 Apr 1992	17 May 2014	114.56	PAHARPUR	NTS
290	12101-3224864-1	MUHAMMAD ZAFRAN	HIDAYAT ULLAH SHAKIR	DIK	GPS NO. 11 DIKHAN	15 May 1989	17 May 2014	114.52	DIKHAN	NTS
291	12101-0915691-1	MUHAMMAD BARAN	MAKHAN KHAN	DIK	GPS NO. 2 HAJI MORA	20 Mar 1979	05 Dec 2014	114.47	DIKHAN	NTS
292	12101-0409535-9	MUHAMMAD QAISER KHAN	SANWAL KHAN	DIK	GPS DARABAN KHURD	01 Oct 1986	17 May 2014	114.42	PAROVA	NTS
293	12101-7672606-1	ASMAT ULLAH	KHUDA BAKHSH	DIK	GPS KOTLA SAIDAN	17 Apr 1986	17 May 2014	114.40	DIKHAN	NTS
294	12101-3228351-9	AZIZ ULLAH	ALLAH WASAYA	DIK	GPS HISSAM	30 Apr 1986	17 May 2014	114.25	DIKHAN	NTS
295	12101-0945908-3	MUHAMMAD BILAL	MALIK SOOBA	DIK	GPS RANGPUR JANUBI	12 Dec 1981	17 May 2014	114.20	PAROVA	NTS
296	12103-1502759-7	ASMAT ULLAH	MUHAMMAD KHAN	DIK	GPS NO. 1 QHALLAH	01 Jan 1978	25 Feb 2017	114.15	PAHARPUR	NTS
297	12102-4662592-1	MUHAMMAD TARIQ	GHULAM MUSTAFA	DIK	GPS NO.1 RORRI	05 Oct 1990	17 May 2014	114.06	KULACHI	NTS
298	12101-7191837-1	MOHAMMAD ATIF SHAHID	AMANULLAH	DIK	GPS KURAI	18 Apr 1983	05 Dec 2014	113.84	DIKHAN	NTS

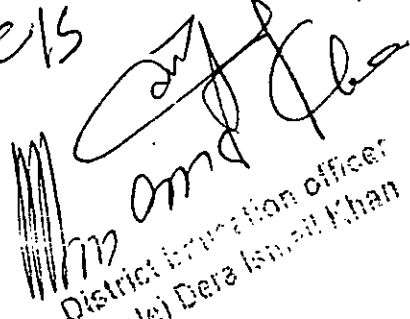
1171	12102-1010340-2	DILAWAR SHAH	YAQUB SHAH	DIK	GPS FATEH ALI	27 Apr 1984	05 May 2017	108.57	DARABAN KALAN	NTS
1172	12101-4208009-7	ZIA UR REHMAN	JUMMA KHAN	DIK	GPS HATHALA	26 May 1990	05 May 2017	107.37	KULACHI	NTS
1173	12105-0352676-5	SAMI ULLAH MALIK	QUDRAT ULLAH	DIK	GPS GARA AASHIQ	30 Apr 1993	05 May 2017	107.33	PAROVA	NTS
1174	12105-2822984-7	MUHAMMAD TARIQ KHAN	MUHAMMAD RIAZ	DIK	GPS HAJI KHEL	27 Feb 1991	05 May 2017	106.92	PAHARPUR	NTS
1175	12102-5400765-7	SHAH ZAIB KHAN	JALIL AHMAD KHAN	DIK	GPS GARA BAKHSHA	03 Mar 1996	05 May 2017	106.40	DIKHAN	NTS
1176	12103-1242358-1	KIFAYATULLAH KHAN	ABDULLAH JAN	DIK	GPS YARI KHEL	03 Feb 1987	05 May 2017	106.13	PAHARPUR	NTS
1177	12102-8289497-5	SIRAJ UD DIN	ZAHOR US DIN	DIK	GPS GARA MOHABBAT	29 May 1992	27 Sep 2017	106.11	KULACHI	NTS
1178	12101-8060378-1	ALI ASGHAR	KARIM KHAN	DIK	GPS WANDA HAIBATTI	01 Jan 1989	05 May 2017	105.68	DIKHAN	NTS
1179	12103-2610033-3	MUHAMMAD FAROOQ	AALAM KHAN	DIK	GPS UMER KHEL	02 Mar 1992	27 Sep 2017	103.67	PAHARPUR	NTS
1180	12101-3779757-5	SYED FARMAN ALI SHAH	SYED SHARAF HUSSAIN SHAH	DIK	GPS KOKAR GHARBI	03 Jan 1996	05 May 2017	102.23	DIKHAN	NTS
1181	12101-2538743-3	MUHAMMAD WAQAR KHAN	RUSTAM KHAN	DIK	GPS KOKAR GHARBI	11 Dec 1996	05 May 2017	102.23	DIKHAN	NTS
1182	12101-2782462-5	ABDUL RAUF	MUHAMMAD AZIM	DIK	GPS NO. 2 POTA	26 Nov 1991	05 May 2017	101.65	DIKHAN	NTS
1183	12102-6047043-1	MUHAMMAD RAFIQ	ALLAH DAD	DIK	GPS KOT ATAL SHARIF	25 Dec 1990	05 May 2017	101.51	KULACHI	NTS
1184	12103-4624642-1	KHALID AZIZ	AHMAD NAWAZ	DIK	GPS KACHI KATH GARH	02 Feb 1986	05 May 2017	100.96	PAHARPUR	NTS
1185	12101-0839585-5	MUHAMMAD IKRAM ULLAH	HAFIZ NAIMAT ULLAH	DIK	GPS JEEWAYA SAHI	15 Sep 1992	05 May 2017	100.18	DIKHAN	NTS
1186	12101-0935010-3	MUHAMMAD IQBAL	MUHAMMAD KHAN	DIK	GPS MIALI	10 Jun 1982	05 May 2017	100.05	PAROVA	NTS
1187	12101-5668286-1	MUHAMMAD ZEESHAN	GHULAM BAKIR	DIK	GPS KOKAR SHARQI	11 Sep 1996	05 May 2017	97.95	DIKHAN	NTS
1188	12101-1690406-1	FARID ULLAH	AZIZ ULLAH	DIK	GPS SHERU KOHNA	29 Dec 1992	05 May 2017	96.31	DIKHAN	NTS
1189	12101-0982330-5	KHALIL AHMAD	GHULAM RASOOL	DIK	GPS ZAFFAR ABAD COLONY	12 Dec 1981	05 May 2017	96.02	DIKHAN	NTS
1190	12101-0313868-3	MUHAMMAD KHALID	MUHAMMAD AKBAR	DIK	GPS SHERU KOHNA	14 May 1990	05 May 2017	95.62	DIKHAN	NTS
1191	12101-0755069-3	MUHAMMAD TARIQ BILAL	ABDUL WAHEED	DIK	GPS DARRABRI	11 Apr 1984	05 May 2017	95.35	DIKHAN	NTS
1192	12104-4482259-7	MUHAMMAD KHALIL	ABDUL RASHEED	DIK	GPMS KOTHA DARKHAN	20 Aug 1989	05 May 2017	93.28	DARABAN KALAN	NTS
1193	12105-0360545-3	SABIR SHAH	KHAIR SHAH	DIK	GPS POTA DADANZAI	06 Feb 1986	05 May 2017	93.02	DARABAN KALAN	NTS

1194	12101-8047233-5	RISHI HANS	HEERA LAL	DIK	GPS NAI ABADI KOTLA SAIDAN	12 Jul 1996	05 May 2017	90.48	DIKHAN	NTS
1195	12101-7464937-1	SHAFQAT ULLAH	MUHAMMAD AMEEN	DIK	GPS JEEWAYA SAHT	13 Aug 1988	27 Sep 2017	90.37	DIKHAN	NTS
1196	12101-0970848-7	SHANKAR	MANNA LAAL	DIK	GPS KHANA SHARIF	04 Oct 1973	09 Nov 2017	88.76	PAROVA	NTS
1197	12103-149544-1	SYED MUHAMMAD TAQI ZAIDI	SYED NASIR HUSSAIN ZAIDI	DIK	GPS AMIR SHAH	02 Feb 1977	22 Feb 2018		PAHARPUR	DECEASED SON / MEDICAL BOARD QUOTA
1198	12101-7976492-5	MUHAMMAD SOHAIL	GHULAM FARID	DIK	GPS RATTA KULACHI	05 Mar 1980	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA
1199	12101-9408976-3	KHURAM SHEHZAD	MUHAMMAD IBRAHIM	DIK	GPS AHEER ABAD	01 Apr 1984	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA
1200	12101-8202352-1	ABDUR RASHID	ABDUR RAHIM	DIK	GPS GOMAL KHURD	31 Jan 1985	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA
1201	12101-0808292-3	AFTAB MOHAY UD DIN	MOHAMMAD ASLAM	DIK	GPS SHEIKH RAJU	02 Apr 1985	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA
1202	12101-5595268-1	MUHAMMAD ALI NUMAIR	SYED JAHANGIR ABBAS	DIK	G.P.S WANDA BALOCH KOKAR	21 Mar 1992	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA
1203	12102-5739990-3	IRFANULLAH	FATEH ULLAH	DIK	GPS NO.2 KOT ESA KHAN	04 Oct 1993	22 Feb 2018		CHODWAN	DECEASED SON / MEDICAL BOARD QUOTA
1204	12101-5310377-9	ALI JAMSHED	JAMSHED AHMAD	DIK	G.P.S SHAIKH YOUSAF	13 Feb 1994	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA

CHAIRMAN: MUHAMMAD SHAFIQ

MEMBER 1: ASIM SAEED

MEMBER 2: MUHAMMAD DANISH ROOMAN

e/s

 District Irrigation Officer
 (Male) Dera Ismail Khan

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

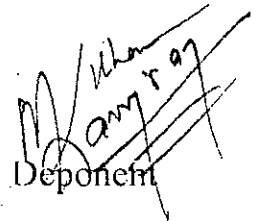
SERVICE APPEAL No. 7509/21

Syed Sohail Ahmad Shah Gillani & 33 VS

Government of KPK

Affidavit

I Mr: Muhammad Kamran Khan ADEO (M) D.I.Khan do solemnly affirm and declare on oath that contents of written reply are correct to the best of my knowledge and nothing has been concealed from this honorable Court


Deponent

BEFORE THE HONOURABLE SERVICE TRIBUNAL, KPK PESHAWAR

SERVICE APPEAL No. 7509/21

Syed Sohail Ahmad Shah Gillani & 33

VS

Government of KPK

Authority

I District Education Officer (M) D.I.Khan do hereby authorized Mr: Muhammad Kamran Khan to attend the honorable Service Tribunal KPK Peshawar on behalf of respondent in connection with submission para wise comments till the decision of service appeal.



Respondent No.5
District Education Officer
(M) D.I.Khan