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 12.

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 12 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 12 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 **3**1.0**3**.2022

Due to retirement of the Hon'ble Chairman, the Tribunal is defunct. To come up for the same on 29.03.2022 before S.B.

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

Appelled Teposited

36

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.

(Salah-Ud-Din) Member (J)

Camp Court D.I.Khan

## Form-A



Court of				
Courtor		-		

-	ر ماست سرم		-
Case No	7540	/2021	

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/10/2021	The appeal resubmitted today by Mr. Muhammad Anwar Awan Advocate may be entered in the Institution Register and put up to the
2-		Worthy Chairman for proper order please.  REGISTRAR  This case is entrusted to S. Bench at Peshawar. Notices be issued to
	·	appellant/counsel for preliminary hearing to be put up there on-
	*	CHAIRMAN

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 appellant for completion and resubmission within 15 days.

- 1- Addresses of appellant 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 appellant may be highlighted.
- 3- Copy of departmental appeal <u>in respect of appellant</u> 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 appellant.
- 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 appellant 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. 1336 /S.T.
DE. 19/07 /2021

REGISTRAR SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

<u>Mr.Sanaullah Shamim Gandapur Adv.</u> <u>Supreme Court at D.I.Khan</u>

Respected Sir,

is lightited. Copy of departmental appeal is annexed. All better copied of Annexured are ligible photostate copies objection is rectified. Appeal is signed and Annexure are plagged. Annexure are duly attested. Appeal is duly paged and certified. There are duly attested. Appeal is duly paged and certified. Copies of respondents attached.

Annow Ad

Reference your reply submitted in response to our observation, it is reiterated that the objections/observations rose by this office at serial no. 3, 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.\_\_\_\_\_/S.T,

Dt.\_\_\_\_\_/2021

REGISTRAR SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

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

R/s

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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Case Title: NO This Appeal has been presented by: M. Anway Whether Counsel/Appellant/Respondent/Deponent have 2 the requisite documents? Whether appeal is within time? Whether the enactment under which the appeal mentioned? Whether the enactment under which the appeal is filed is correct? Whether affidavit is appended? Whether affidavit is duly attested competent 7 Commissioner? Whether appeal/annexures are properly paged? 8 Whether certificate regarding filing any earlier appeal on the subject, furnished? 10 Whether annexures are legible? Whether annexures are attested? Whether copies of annexures are readable/clear? 12 13 I Whether copy of appeal is delivered to AG/DAG? Whether Power of Attorney of the Counsel engaged is attested 14 and signed by petitioner/appellant/respondents? Whether numbers of referred cases given are correct? 15 Whether appeal contains cutting/overwriting? 16 17 Whether list of books has been provided at the end of the appeal? 18 Whether case relate to this court? Whether requisite number of spare copies attached? - 19 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 Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule II, notice along with copy of appeal and annexures has 25 been sent to respondents? On Whether copies of comments/reply/rejoinder submitted? On 26 Whether copies of comments/reply/rejoinder provided to 2.7 opposite party? On

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

Name:

Signature:

Dated:

DAY 2

03/08/202

Anwax Awan ASC

# BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR CAMP COURT DERA ISMAIL KHAN.

Appeal no. 7540. of 2021.

Abdul Qayum

VS

Govt Of KP& Others

## **INDEX**

No.	Particulars	Annexure	Pages
1	Appeal		1-4
2	Copy appointment order	A	5-8
3	Copy of Regularization Order	В	9-11
4	Copy of Office order Dated 04-06-2020.	C	12
5	Copy of orders dated 24-06-2020	D	13
6	Copy of Seniority List	E	14-5
7	Copy of Departmental Appeal	F	16-19
8 -	Wakalat Nama	G	20

Your humble Appellant

Abdul Qayum Through Counsel

Mohammad Anwar Awan Advocate Supreme Court.

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR CAMP AT DICHAN

Service Appeal No \_\_\_\_\_\_/2021

ABDUL QAYYUM PST GPS RAMAK NO 1. U/c Miran S/o Hag Nawaz R/o Ramak Paroud (Appellant)

Khyber Pakhtukhwa Service Tribunal

#### **VERSUS**

Diary No. 7270

- 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.

M. A my or A M

Anna

. dea-day

Registrar

- 6. AQAL KHAN GPS NO.1 REHMANIKHEL DISTT: D.I.KHAN
- ZIA UR REHMAN GPS NO.1 REHMANIKHEL DISTT: D.I.KHAN
- 8. HIZBULLAH KHAN GPS NO.1 TAKWARA DISTT: D.I.KHAN
- A. MUHIB HUSSAIN SHAH GPS NO. 2 DHALLAH DISTT: D.I.KHAN
- 10. ASSAD HUSSAIN SHAH GPS WANDA TALGI DISTT: D.I.KHAN
- /t. ABDUR RAUF KHAN GPS KOT MASOODAN DISTT: D.I.KHAN
- 12. MUHAMMAD ZAFFAR GPS MANDHRA SAIDAN DISTT: D.I.KHAN

SERVICE APPEAL UNDER SECTION 4 OF SERVICE
TRIBUNAL ACT 1974 TO DIRECT THE RESPONDANTS

TO REVISE/CORRECT THE SENIORITY LIST ISSUED BY THE OFFICIAL RESPONDENTS AS PER DATE OF INITIAL APPOINTMENT AND PROMOTE THE APPELLANT AS PER THEIR SENIORITY ALONGWITH BACK AND FUTURE

BENEFITS.

Respectfully Sheweth,

- .1. That Appellant is appointed as Primary School teacher through NTS on 17-05-2014 while Respondent No 11 to 17 are appointed as PST vide order Dated; 05-12-2014 on contract basis. Copy of Appointment Orders are Annexure A.
- 2. That the Appellant is Qualified PST and after his appointment, has been serving the Department with due diligence, utmost care and devotion, always tried to his best and has spotless service record. The Appellant and other were regularized on 10-03-2018. Copy of Order Dated; 10-03-2018 is Annexure B.
- 3. That on 04-06-2020, the concern District Education Officer vide Letter No. 11728 has sought guidance for preparing of seniority List of PSTs, the mechanism was provided by the Assistant Director (Estab;) Elementary and secondary Education Department Khyber Pakhtunkhwa (Respondent No. 04) then a Seniority list was prepared by Respondents. Copies of Office order Dated; 04-06-2020 and Office order Dated; 24-06-2020 and seniority list are Annexure C, D & E.
- 4. That on attaining knowledge on 20-03-2021, the appellant along with others has preferred departmental Applications/ Appeal 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 Annexure F.
- 8. That feeling aggrieved from above said action appellants are constrained to approaches this honorable court on the following amongst other:

#### GROUNDS:

1. That the action of respondents is against facts and law, ultra vires, without

Hundri

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.

Skindi

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

ABDUL QAYYUM
(Through Counsels)

Inwar and

MUHAMMAD ANWAR AWAN

Advocate supreme Court of Pakistan D.I.Khan.

KANEEZ BATOOL Advocate High Court D.I.Khan

#### **AFFIDAVITE**

I, ABDUL QAYYUM PST GPS RAMAK NO 1. 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.

Deponent

Identified by Counsel;

12101-4466515-7

MUHARARIAD ANWAR AWAN

Advocate supreme Court of Pakistan D.I.Khan.

Sermad Ramps Stories

Catificate:

It is certified that no appeal is filled on similar subjects matter before How ble Tribunal.



## CE OF THE DISTRICT EDUCATION OFFICER (MALE) DERA ISMAIL KHAN

### **APPOINTMENT**

\_ A —

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	e Roll No NAME		FATHER'S NAME	CNIC	SCORF.	PLACE OF POSTING	UNION -	
	ı <del></del>		DERA ISI	MAIL KHAI	V		COUNCIL	
<i>I</i> .	1760062 MUALIMMAD SHAIIID		QAYYUM 12101- NAWAZ 628693		93.5	GPS DAKWESHA	CHEHKAN	
·2. '	1760177	BASHIRAHMAD	MUHAMMAD AFZAL .	12 <u>10</u> 1- 8038430-1	97.19	GPS GARA BALA	CHEHKAN	
\$. *	.17 <b>6</b> 0752	NAVEED ARMAD	NAZIR AHMD	12101- 2041550-9	109.58	GPS GARA HASSANI	СНЕНКАМ	
-, 	1760368	MUHAMMAH) RAMZAN	SHER ZAMAN	12101- 7034423-1	116.35	GPS GARA MORE	CHEHKAN	
	1760733	<i>КАНМАТ ОГЛАН</i>	SARFARAZ	12101- 5709320-3	95.33	GPS HAINDAN	CHEHKAN	
	1760335	MAZHAR IQBAL	MUHAMMAD JQBAL	12101- 4536514-5	87.57	GPS JANDI SINDH	CIDIHKAN	
	1761263	MUHAMMAD ABBAS	MUHAMMAD RAMZAN	12101- 1989179-5	109.62	GPS JEVAYA	СНЕНКАМ	
	1760735	MUHAMMAD SALEEM	KARIM BAKHSH	12101 0972120-3	117.46	GPS NO. 2 POTA	СИЕНКАМ	
-	176269Q	MUHAMMAD NADEEM AKHTAR	MUHAMMAD ASLAM	12.01- 3818810-5	87.92	GPS, NO. 2 POTA	СИЕНКА́М	
) <u>.                                    </u>	176-1200	RAB NAIVAZ	GUL SHER	J2101- 7539649-3	95.9	GPS NURANG UTRA	CHEHKAN	
	1764043	ABDUL BASAT	MAULVI. GHULAM HASSAN	12101- 3958240-7	116.49	GPS SHERU KOHNA	CHEHKAN	
:. 		SANA ULLAH	GHULAM QADIR	12101- 9636197-3	88.45	GPS SIKANDAR SHUMALI	CHEHKAN	
·	17000.42	SHAHZADA MUHIB ULLAH	MUHAMMAD ASLAM	12101- 3837795-9	92.31	GPS SINVAC	СНЕНКАМ	
r	( / ( / ( / ( / ( / ( / ( / ( / ( / ( /	MUHAMMAD ALTAF KHAN	UMAR HAYAT KHAN	12101- 7309163-5	98.29	GPS TAI NA	CHEHKAN	

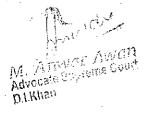
Page Lof 32



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S. No	Rolf No	. NAME	FATHER'S NAME	CNIC	SCORE	PLACE OF POSTING	UNION COUNCIL
565.	1760704	PHDAYAT ULLAII	MALIK EIDU	12101- 6838998-5	109.69	GPS BHUTAISER SHERQI	MIRAN
576.	1764006	GHULAM QASIM	MAKHAN KHAN	12101- 1345381-1	74.87	GPS CHIRI BHORE	MIRAN
(77)	1760214	MUHAMMAD ASGHAR	GHULAM RASOOL	12101- 1016267-3	79.54	GPS GISHKORI	MIRAN
778.	1763907	MUHAMMAD	SAEED AHMAD	12105- 0344849-3	72.66	GPS GISHKORI	MIRAN
579.	1760520	ABDUL GHAFFAR	MALKOO KHAN	12101- 6678663-9	86.43	GPS JALALAH	MIRAN
580.	1763215	AKHTAR MUNIR	GHULAM HAIDER	12101- 0974828-9	81.79	GPS JH; HAYAT	MIRAN
581.	1762112	NASIR MAHMOOD KHAN	RÀBNAWAZ KHAN	12105- 0351241-7	71.96	GPS JH; MACHIAN	MIRAN
X	1760793	SANA ULLAH	MUHAMMAD AFZAL	12101- 7646050-5	87.01	GPS JH:MUHAMMAD AMINE	MIRAN
583.	1760530	MAQBOOL AHMAD	ALLAH \ BAKHSH	12101 4466515-7	96.92	GPS KAHERI PAKKA	MIRAN
584,	1762383	FIDA МИПАММАD	FAIZ MUHAMMAD	12101- 3714132-7	70.93	GPS MIREN	MIRAN
585.	1762084	RIAZ ALI KHAN	NIAZ ALI KHAN	12101- 5193915-9	125.5	GPS NO. J RAMAK	MIRAN
586, 	1760087	AMIR MUHAMMAD	FAQIR MUHAMMAD	12101- 0336780-5.	112.42	GPS NO. 1 RAMAK	MIRAN
587.	1761996	SHAH NAWAZ	IIAQ NAWAZ	12101- 7958647-3	95.79	GPS NO. 1 RAMAK	MIRAN
588.	1760038	IMDAD HUSSAIN	GHULAM ABID	12105- 0341593-1	90.99	GPS NO. 1 RAMAK	MIRAN
589.	1700515	ABDUL QAYYUM	HAQ NAWAZ	12101- 1742307-9	84.32	GPS NO. 1 RAMAK	MIRAN
590.)	1782190	KIFAYAT ULLAH	IMAM BAKHSH	12101- 2755369-9	78.13	GPS NO. 2 RAMAK	MIRAN
<u> 591)</u>	1763228	GULZAR KHAN	SHADU KHAN	12101- 4816365-7	91.13	GPS SARA GARA	MIRAN
592.	1760620	HISAN ULLAH	HAFEEZ ULLAH	12105- 0354017-3	82.19	GPS SARA GARA	MIRAN
593.	1760911	MUHAMMAD IQBAL	GHULAM JAFFAR	12101- 5695108-9	100.37	GISHKORI BALA	Naivela
594.	1760636	HIDAYAT ULLAH	MUHAMMAD AFZAL	12101- 5048995-5	124.5	GPS BUCHRI	Naivela .
.595.	1763478	MUHAMMAD	MUHAMMAD RAMZAÑ	12101- 5192880-1	98.29	GPS GARA ASHIQ	Naivela

Page 29 of 32



				•			•
S.No	Rolf No	NAME	FATHER'S NAME 4	CNIC	SCORE	PLACE OF POSTING	COUNCIL.
618.	~1760171	OBAID 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 ÜLLAH	QADIR BAKHSH	12101- 2693445-1	84.6	GPS NO.5 PAROA	PAROA
622.1	1760563	RASHEED AHMAD	DUR MUHAMMAD	12101- 5965545-1	86.05	GPS THAT SOLAN	PAROA

### TERMS & CONDITIONS

J. J.

- I. 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 stands 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.

Page 31 of 32

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- 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. <u>7135-7765 /PST</u>

Dated DIKkhan the 17-05-2014

Copy forwarded for information and necessary action to:

- 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.
- The SDEOs (Male) DIKhan/Paharpur/Paroa/Kulachi.
- The Candidates Concerned.
- 6. Master File,

Vistrict Education Offi DIKHAN



## OFFICE OF THE DISTRICT EDUCATION OFFICER

(MALE) DERA ISMAIL KHAN

Tell: 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 lout of 2001	School	UC	Appointment order No and dated	Extension order No and dated if any	CNIC
ı	1760002	MUAIIMMAD 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	OPS GARA HASSANI	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12)01- 2041550-9
4	1760368	MUHAMAMD RAMZAN	116.35	GPS GARA MORE	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 7034423-L ·
5	1760733	RAHMAT ULLAH	95.33	GPS HAINDAN	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 SINDH	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 4536514-5
7	1762690	MUHAMMAD NADEEM AKHTAR	87.92	GPS NO. 2 POTA	Chehkan	Nu. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 3818810-5
8	1764200	RAD 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 62-06-2017	12301- 3958240-7
10	1760108	SANA ULLAH	88.45	GPS SIKANDAR SHUMALI	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 9636197-3
11	1760822	SHAHZADA MUHIB	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 ALTAF KHAN	98.29	GPS TAJ	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 7309163-5
13	1762586	MATI ULLAH	112.95	GPS BASTI DIRKHAN	DD# I	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 8937011-7
14	1763381	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- 4061211-7
18	1760921	AFNAN KHAN	103.37	GPS NO. 1 THOYA FAZIL	DU#2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-
19	1760280	AZMAT UELAH	101.43	GPS NO. 2 THOYA FAZIL	DD#2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-
20	1760338	SAMI ULLAH KHAN	91.13	GPS NO. 2 THOYA FAZIL	DD#2	No. 7135-7765 Dated 17-05-2014	No. 15408-14	0953316-5 12101-
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	7097201-5 12101- 8201696-9
22	1760835	MUHAMMAD HASHIM	102.24	GPS BASTI DHAPPAN WALI	Deewala	No. 7135-7765 Dated 17-05-2014	No. 15408-14	12101-
23	1760648	MUHAMMAD ILYAS	107,04	GPS CHAH MALIK WALA	Deewala	No. 7135-7765	Dated 02-06-2017 No. 15408-14	0936562-1 12101-
24	1769028	MUHAMMAD EHSAN	105.62	GPS CHAH MALIK WALA	Dcewala	No. 7135-7765	Dated 02-06-2017 No. 15408-14	7076340-5 12101- 0940626 <sup>3</sup> 9
25	1760808	ZUBAIR AHMAD	103.41	GPS MADNI TOWN	Deewala	No. 7135-7765 Dated 17-05-2014	Dated 02-06-2017 No. 15408-14 Dated 02-06-2017	0940626 <sup>1</sup> 9, 12101- 3119854-5

Regularization Order PST /(N	TS Adhoc) (2018) Dera Ismail Kha	77
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					Negata iza		<del></del>		
 Sr	RollNo		Name	Total Maries Jout of 2001	School	UC	Appointment order No and dated	Extension order No and dated if any	CNIC
486	1762086	i IM	DAD HUSSAIN	90.58	GPS SAMOKHEY WALI	Mahra	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 4988670-1
487	176231		JIIAMMAD DUNIS	90.01	GPS CHAH ROSHAN	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	0951527-9
488	176069	IS	RAR UHAMMAD	126.62	GPS JHOKE GUMLA	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	3144698-1
489		161	LLAH BAKHSH	115.55	GPS IHOKE KHALLAR	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 0924552-5
490		, M	UHAMMAD	84.78	GPS JHOKE KHALLAR	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 3610423-7
			UNAIR ADIL IEHTAB AHMAD	88.41	GPS JHOKE	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 4278166-3
491			UHAMMAD	87.59	GPS JHOKE	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 5574067-1
.49			RFAN	90.03	GPS KOTAH	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 0935425-7
19			ZIZULLAH	<del>                                       </del>	GPS N A JH	Malana	No. 7135-7765	No. 15408-14 Dated 02-06-2017	12101- 2520476-7
49	4 1763	550	MUHAMMAD ASIF	101,75	GPS NAI ABADI		Dated 17-05-2014 No. 7135-7765	No. 15408-14	12101-
45	5 1761	990	ABDUR RASHID	-86.9	JH; KHALLAR NO. 2	Malana	Dated 17-05-2014	Dated 02-06-2017	0779319-9
	96 1763	ו אגע	SYED ZAIGHAM ABBAS SHAH	121.9	GPS PACCA	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 9315198-9
1	97 1762	1302	MUHAMMAD YASIR DASHIR	113.69	GPS NO 2	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 0992411-7
_	198 176	3283	TANVEER KHAN	89.52	GPS NO. 2	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 0502400-5
	499 176	0392	MUHAMMAD	85.4	GPS PACCA	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 4963071-9
-	500 176	3567	ZUBAIR MUHAMMAD	90.46	GPS SHALA	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 2312297-3
$\mid$			ISMAIL MUHAMMAD	81.74	GPS WANDA	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 7666772-5
-	·	60809	RAMZAN ARSHAD	81.4	GPS WANDA	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 0957017-5
}		63027	MAHMOOD K!FAYAT ULLAH	72.0		Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 1345381-1
-	504 17	60704	HIDAYAT ULLAH	109.6	GPS BHUTAISEF SHERQI	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 7646050-5
	505 17	764006	GHULAM QASIM	7 <sub>4</sub> .8	GPS CHIRI	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 3714132-7
.	506 1	760214	MUHAMMAD ASGHAR	79.5		Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 6838998-5
Ì	507	763907	MUHAMMAD ZAREEF	72.6	66 GPS GISHKORI	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12105- 0344849-3
	508 1	760520	ABDUL GHAFFAF	₹ 86.4	43 GPS JALALAH	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 7958647-3
	509 l	763215	AKIITAR MUNIR	81.7		Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 0974828-9
	510	762112	NASIR MAHMOO KHAN	D . 71.9	MACHIAN	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 0974828-9
	511	760793	SANA ULLAH	87.6	GPS JH;MUHAMMA AMINE	D Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 6678663-9
	512	1760530	MAQBOOL AHMA	AD 96.	92 GPS KAHERI PAKKA	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 4466515-7
	513	1762383	FIDA MUH <b>AMM</b>	D 70.		Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 3714132-7
	514	1762084	RIAZ ALI KHAN	125	5.5 GPS NO. I RAMAK	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12105- 0354017-3
	515	1760087	AMIR MUHAMM	AD 112	C.42 GPS NO. 1 RAMAK	Miran	No. 7135-7765 Dated 17-05-2014		12101- 0336780-5
	516	1761996	SHAH NAWAZ	95.	.79 GPS NO. 1 RAMAK	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 1742307-9
_	517	1760038	IMDAD HUSSAIN	90 د	.99 GPS NO. 1 RAMAK	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 5193915-9
_	518	1760515	ABDUL QAYYUI	M 84	.32 GPS NO. I RAMAK	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	
	519	1762190	KIFAYAT ULLAI	i 78	RAMAK	Miran	Daica 17-03-2014		
	520	1763228	GULZAR KHAN	91	.13 OPS SARA GA	RA Miran	Dinea 17-03-2014		
	521	1760620	141114414145	82	.19 GPS SARA GA	RA Miran	Dates 17-05-2014		
	522	1760911	MUHAMMAD IQBAL	10	0.37 GISHKORI BA	LA Naivel	n No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	1244- 549108-9

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OFFICE OF THE DIST.

Dated Dickhan the 04 106 /2020

The Director

Elementary & Secondary Education.

Khyber Pakhtunkhwa, Peshawur

GUIDANCE REGARDING SENIORITY LIST OF PST Subject:

Respected Sir.

It is stated for your kind information that a letter bearing No. 34832 dated 13/12/201 on the subject cited above has been submitted to your good office but no guidance in provided in this regard (ill-yet

DERAISMAIL KHAN

It is requested that seniority list of PST (NTS) is under process of updating nov necessary guidance is required on the foillowing paints.

i Whether the seniority tiskin updated according to ment 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 be on May 2014 & December 2014. Whether these phases may be merged together and then determine then Seniority on cotherwise.

(MALE) DERA ISMAIL KHA

Lindsi: No.11 729-33/

Dated: 04 1 06 /2620.

copy for information to the:-

PA to Director Elementary & Secondary Education Khybaic Pakhtunkhiva Peshawa

Deputy District Education Officer (Male) DIKhan

All the SDEO's (Male) in District Dera Ismail Khang

PA to DFO (Male) DIKhan.

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

No. 64/6 /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

Assistant Director (Estab :) Elementary & Secondary Edu: Khyber Pakhtunkhwa Peshawar

11/2

Copy forwarded to the:-

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

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

Margary Com



## 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.

Mr. Muhammad Shafiq Principal, GCMHS No.1 D.I.Khan (Chairman)

Mr. Asim Saeed Principal, GHS Himmat D.I.Khan (Member)

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 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	<b>.</b>	PRESENT PLACE OF POSTING	DATE OF BIRTH	DATE OF TAKING CHARGE	SCORE	TEHSIL	METHOD OF APPOINTMENT	REMARKS
	12101-	SHAH JAHAN	GUL DAD	DIK	GMPS JALAL BORING	17 Mar 1961	01 Feb 1979		DIKHAN	DIRECT APPOINTMENT	
	2	AZIZ ULLAH	SAAD ULLAH	DIK	GPS DIN PUR	20 May 1961	26 May 1982		DIKHAN	DIRECT APPOINTMENT	
3.4	4	MUSHTAQ AHMAD	RAB NAWAZ	W. C C.	GPS MITHA PUR KALAN	10 Apr 1962	16 Dec 1982		PAHARPUR	DIRECT APPOINTMENT	
14.8	1490966-3 12103-	ALLAH NAWAZ	MUHAMMAD NAWAZ	DIK	GPS KALA GORH	10 Sep 1962	17 Nov 1983		PAHARPUR	DIRECT APPOINTMENT	
	12013-	GHANI-UR-REHMAN	SHER DIL	DIK	GPS NO.1 PAHARPUR	.01 Nov 1962	20 Dec 1983	1	PAHARPUR	DIRECT APPOINTMENT	
	`3841194-3 12101-	ASEEM KHAN	AZAM KHAN	J. ↓ DIK	GPS GILOTI	01 May 1963	19 May 1984		DIKHAN	DIRECT APPOINTMENT	: 79
h. 1080.	12101	MUHAMMAD RASHID	GHULAM JEELANI	DIK	GPS KOKAR GHARBI	10 Sep 1961	05 Sep 1984		DIKHAN	DIRECT APPOINTMENT	i l
		ABDUL SAMAD KHAN	ABDUL GHAFAR	DIK	GPS BASTI BALOCHAN	28 Apr 1961	17 Oct 1984	1	DARABAN	DIRECT APPOINTMENT	
، بالله عدا م	12101-	ABDUL RASHID	IMAM BAKHSH		GMPS HAZARA PAKKA	15 Oct 1963	17 Oct 1984		PAROVA	DIRECT APPOINTMENT	•
10	0939011-5 12103-	MUHAMMAD ABBAS	ABDUL HUSSAIN SHAH	DIK	ĢPS SAID ALIYAN	15 Apr 1965	17 Oct 1984	•	PAHARPUR	DIRECT APPOINTMENT	

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826 3815127-9	MUHAMMAD ISHFAQ	MALKA	DIK	GPS HIMMAT WALA	13 Feb 1987	05 Dec 2014	85.03	DIKHAN	NTS	3
827 2450301-9	IKRAM ULLAH	KHDUA BAKHSH	1.50	GPS KOHAWAR	24 Apr 1988	17 May 2014	85.02	DARABAN KALAN	NTS	
12102- 8289 12131184-5	MUHAMMAD ISMAIL KHAN	AHMAD NAWAZ KHAN	DIK	GPS KOT MUSA	04 Apr 1982	17 May 2014	84.97	DARABAN KALAN	NTS	4 7 4
829 12101- 3610423-7	MUHAMMAD NUMAIR ADIL	MALIK INAYAT ULLAH	DIK	GPS KAT SHAHANI	02 Feb 1985	17 May 2014	84.78	PAROVA	NTS	\$ 25 E
12101- 830 5736347-3	MOHAMMAD YAQOOB	MUHAMMAD RAMZAN	DIK	GPS SARDARAY WALA	15 Mar 1989	17 May 2014	84.61	DIKHAN	NTS -	
12101- 2693445-1	SAMI ULLAH	QADIR BAKHSH	DIK	GPS PAROVA NO 5	02 Dec 1990	17 May 2014	84.60	PAROVA	NTS	
332 3355116-7	MUHAMMAD AMJAD	ALAM SHER	DIK	GPS GARA RAMZI	01 Jan 1994	17 May 2014	84.60	DARABAN KALAN	NTS	
833 4611793-9	BASHIR AHMAD	MUHAMMAD RAMZAN	DIK	GPS NO 3 KECH	07 Feb 1981	17 May 2014	84.37	DIKHAN	NTS	
12101- 4466515-7	ABDUL QAYYUM	HĀQNAWAZ .	DIX	GPS RAMAK NO 1	20 Apr 1984	17 May 2014	84.32	PAROVA	NTS	
838 12101- 5027815-5	TAHSEEN ULLAH	FAZAL AHMAĎ	DIK	GPS NO. 2 POTA	14 Aug 1992	05 Dec 2014	84.31	DIKHAN	NTS	
836   12102- 5507317-1	MUHAMMAD TUFAIL	ABDUL LATIF	DIX	GPS SHAH ALAM	08 Jan 1993	17 May 2014	84.08	DARABAN KALAN	NTS	
12101- 5753979-5	INTIZAR HUSSAIN	MUKHTIYAR HUSSAIN	DIK	GPS NAIVELA	25 Dec 1991	05 Dec 2014	83.96	PAROVA	NTS	
12101- 838 6888027-9	ABDUR REHMAN	HOTE KHAN	DIK	GPS NO 2 JK/MOHANA	01 Mar 1984	17 May 2014	83.92	DIKHAN	NTS	i 4 2 2 - Canada anticipatrica de la constitución de descripción de la constitución de la
12101- 4243356-7	MUHAMMAD AAMIR	MUHAMMAD RAMZAN	DIK	GPS BABBAR PAKKA	16 Mar 1990	17 May 2014	83.89	PAROVA	NTS	- 100
840 . 12101- 3594168-7	MAZHAR HUSSAIN	ASHIQ HUSSAIN	DIK	GPS MURYALI	07 Apr 1989	05 Dec 2014	83.85	DIKHAN	NTS	
12101- 840 9261062-7	GHULAM SAMDANI	GHULAM RABBANI	DIK	GPS JAVID NAGGER	25 Feb 1981	17 May 2014	83.71	DIKHAN	NTS	
12101- 2531840-9	MUHAMMAD IRFAN	ALLAH WASAYA	DIK	GPS WANDA BALOCH KOKAR	20 Feb 1989	05 Dec 2014	83.71	DIKHAN	NTS	
12101- 843 9168133-3	MUHAMMAD SALEEM	YASEEN	DIK	GPS AZIZ ABAD	05 Jan 1989	05 Dec 2014	83.68	DIKHAN	NTS	1
12102- 844 4362397-9	SYED MUHAMMAD FARHAN SHAH	ABDUL MANAN SHAH	DIK	GPS BHUKKI	14 Apr 1991	17 May 2014	83.64	DARABAN KALAN	NTS	
845 0992030-7	MUHAMMAD ISHAQ KHAN	AMAN ULLAH KHAN	DIK	.GPS DHANDLAH	01 Mar 1981	05 Dec 2014	83.62	PAROVA	NTS	
846 85653347-5	ZIA UR REHMAN	ATTA UR REHMAN	DIK	GPS IJAZ ABAD	01 Oct 1989	05 Dec 2014	<b>8</b> 3.59	DIKHAN	NTS	
847 8224182-1	NAIMAT ULLAH	MUHAMMAD AMEER	DIK	GPS NO. 1 HAJI MORAH	06 Jun 1984	05 Dec 2014	83.49	DIKHAN	NTS	
848 12101-	SHAH BARAN	SHAH JAHAN	DIK	GPS SHEIKH YOUSAF	01 May 1979	05 Dec 2014	83.48	DIKHAN	NTS	
		•		. ,					·	

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1. The District Education Officer (Male) D. I. Khan

College Salandres 23/3/3/

Subject: Appeal against the Seniority/promotion order of PST (BPS-12) 19 SPST (BPS-14)

Most respectfully, it is stated that District Education Officer D. J. 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 concerned:

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 order 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").

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." (appex "F").

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 FKhan.

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, weather 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.

M. Arrayar Awan Advocate Supreme Count D.I.Knan It was clearly stated that Seniority/promotions orders will be designed accordance to "THE KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, SENIORITY/PROMOTION &TRANSFER) RULES, 4989 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

M. Wrest at Anticer Advocate Supreme Coun Differen

PSE DIST - MITTER. Hst y ر) الركمان 1373 و 1973 لعوك فيواً . 1305 1373 (1 · 1.11/ ع) امراد حسين PST عواجه سموكب رال . (46-797693) 0346 7878562 267 GPS PST illinois (3 و) مردالطین PST ماندے رای ، ۵۵۱ PST (4) S) عمالتهار 1980865 و198 معالي 1980865- 1983 عرائي عبدالي CPS PST عرابي - 4344090374 7) ساه دار CAPS PST غررت ، 342 2653616 0345-9849865 \$5.4 Gps PST JULTICE (8 03448596979 . K.J. Gps pst will by M. April Gul 300 كالروارل العالي ال الماري بال بال بي الماري بي المرار بي أورار الماري المرارية الماري المرارية المارية الماري Jakal. help an ولا المرك ولا المرك والكرام المرك ال الم المراك على الى درون على درون على المها المراك المها المراك ا 120313. 245 2434. Por CAPS (PS7) CING 12/5/00 Thomas 0343-2996815 - 11 1000 00 11 M(A) 03459834192: water of 1) 11 E AZILAR Bilai 0340195 1252/ UNO Pino 4 July a في محدالم فسال 0345-9467336. UEUL (19) 0 0345 4872124 2 1020 W 2/4 (3) PST 2501: (4 168 10/10/2 For the St. 5/18/3 11 وي اخترضير ٢٥٦ 19/ ce21/5/28 0-10/3 11 PST 236 1, F 6 pric ( // 12/07 020 2010 3. 10/07. ا) مجراصفر ال جحلی الی مگورنی شرایی . 11 2120-30 ا3- امان الگر جی نوائیں مرکبہ De Jus 32 . الالمالي المنظم الم

A Kroyak AWan Advocate Supremo Count

Sanaullah Shamim Gandapur يريج بشوافا بروكل مقروكا بيري كمدنان بريني برخود بايذر بيركان إرغاص روبروه والساء عاضرونا وجول كالساور بروانك فأوساء جاسانه على مرتسك - من الله في الله في المرحاص موالت كرول كان كرية في موظم حاض منه على الديمة عبد الله من الديمة عبد الله والموالية والمراف المرحاص المركان المركان الموسية كل الديمة عبد الله والموالية والمراسية الموسود المركان التركي المراز والمدول كرونيزوكل ماحديد مودف مدرمقام كجرى كعالوه كورك المحدول كالقاصب يهلي ايج يارو وهليل ورول كرف ك ف دارند، دن الم ين وكل ماحب موسول مدرمة الم جمري كوادوك والدوك والدوري المراقات سي يبل اليجه بايرد في على ويروي كرف كارف الدورات الله المراق و مدر مدر كيرى كماد دادرجك المت الارتي إرواله إلى كيرى كافرات كالمري مجيه وي وفي المراكي فقد الما ينتي وأل كان راریا آئی کے داسطے کی معاون کے اوا کرنے یا مختار وائی کرتے ۔ یہ جی موسوف ڈیریاں شدوں کے مجھ کوکل ساخت و داخت ساحب موسوف شکل کردہ (1 ين ﴿ وَالْحِيلَ اللَّهِ اللَّهِ اللَّهِ مِيسُولَ عَلِيمُ مِنْ وَهِي مِياجِ اللهِ وَهِي إِيادِ فِي استناجِ اللهِ الرَّا وَلِي الرَّا وَلِي الْمِيلُ وَجَرَّ وَاللَّهُ وَاللَّاللَّهُ وَاللَّهُ وَاللَّهُ وَاللَّهُ وَاللَّهُ وَاللَّهُ وَاللّلِي وَاللَّهُ وَاللّلَّالِي وَاللَّهُ وَاللَّهُ وَاللَّهُ وَاللَّهُ وَاللَّهُ وَاللّلَّالِي اللَّهُ وَاللَّهُ وَاللَّهُ وَاللَّهُ وَاللَّهُ وَاللَّهُ وَاللَّالِي وَاللَّهُ وَاللَّهُ وَاللَّالِي وَاللَّهُ وَاللَّهُ وَاللَّهُ وَاللَّالِي وَاللَّهُ وَاللَّلَّ وَاللَّهُ وَاللَّالِي وَاللَّالِي اللَّهُ وَاللَّهُ وَاللَّالِي اللَّهُ وَاللَّالِي اللَّهُ وَاللَّالِي اللَّهُ وَاللَّالِي اللَّالَّالِي اللَّلَّالِي اللّلَّ اللَّالِي اللَّلَّا اللَّلَّ اللَّلَّالِي اللَّالِي اللَّلَّ تهي الفراد اوالي أوركن تم يا فاكرى كراسة الدريم كارويبيروا ول كرية اورسيد وينه الاراض كرية الورثيم سنة عال دسية الأكس كالتي باراض نامده فيعاريز والنسك في القال ووفياً كالمحي المقيد والمعاورة والمرورة عروو تارائ وكالم معدمة ومدون المركير كاستدريروى بقدسة دره نظر والى والقل وكرائي ويراقدك عَدْرِد إِسْرَوْدَا وْكُرِي كِلِعَرِف بِالدِحْوَاستِ بَحْمَ إِمْنَا كِي إِفْرِقَ إِكُولَا ، يَكُل إِدْ فِصلها جرارة ! كُري يحى صاحب موسوف كويش طاوا يجي عليمده بين تديى وال كالعقياد بروكا آود 🗘 مرافزه پرهاخته صاحب موسوف عمل کرده واست خود مخلورهٔ بول به ولاساور بعد مرورت امرون بریاحب موسوف کوید مجل احتیار و کا کر همار برگرده یا سیکم کمی اثراز كي فاردائي بالامورسنة درخواست فطرواني الحراني إعمراني بإدرار حاملية الديد في كيره كسي وورس يروكرا بإجرام كواسية بمواستة بمراء القروكرين وادرايين شيروا تواريك تن برام نین وی اور و پیچه اختیامات حامل دول کے ، جیچه میاحہ یہ موق کو حامل جی واور دومان مقدمہ میں جو کار برجانہ النوام برایگا ، وہ میاهیہ موديد التي ميك كرصاحب مو وف كويدى فيرياد في عدي إلى الاندكرول كارة ساحب موسوف كويددا التيار موكاك و التدري بايروى فرايري الدالدي الدين شان يرأنول مطاليكي المحاسكا صاحب موسوف سيرير الماف يسي ادار لهذاؤ الرية بالمركع وباية متاكمة تعدي مينمون وكالرية المسئن لي بيهاورا حيى الربي مجهليا بهاور نظور بيها

## SERVICE APPEAL No. 7509/21

Syed Sohail Ahmad Shah Gillani & 33

Government of KPK

#### <u>Index</u>

S No.	Description of documents	Description of annuexure	Page No.
01	Reply of service appeal		1-4
02	Annexture	And the second s	5-12
03	Affidavit		/3:
04	Authority		14

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

S.A.no: 7515/2021 Sona-ullah.

#### 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
24.1mdad Hussain	VS	Government of KPK
25. Ihsan Ullah	VS	Government of KPK
26 Muhammad Zarif	VS	Gov nment of KPK
27. Rehmat Ullah	VS	Gov ament of KPK
28. Abdul Ghafoor	VS	Government of KPK
29. Itaji Ahmad	VS	Government of KPK
30. Imdad Hussain	VS	Gövernment of KPK
31. Akhtar Munir	VS	Government of KPK
32. Abu Nasar Muhammad Parsa	$\mathbf{v}\mathbf{s}$	Government of KPK
. 1		

P6/6/2022

#### 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 doctorine of leches.
- 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.

6/0/2022

# 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 Λ)
- 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



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

Respondent No.3. Director E&SE KPK Peshawar

(M) D I Khan

Respondent No. 4 Assistant Director Estab KP Peshawar

Respondent No. 5
District Education Officer

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) Parová D I Khan

Respondent 10 SDEO (M) Daraban Kalan D I K

Submitted for vetting . S. Schael along with 33 being Same Mr. Kamran. Khan: and indentical nature. 06.8. 2022. More to necessary cornection, attachnesis Vetted subject to necessary cornection, attachnesis of annex tures and affidavit.



## OFFICE OF THE DISTRICT EDUCATION OFFICER

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. 2048 9- 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

(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 Saced 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 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.	NAME	FATHER NAME		ENT PLACE OSTING		DATE OF TAKING CHARGE	SCORE	TEHSIL	METHOD OF APPOINTMENT	REMARKS
NO.				CDRVC	17 Mar 1961	01 Feb 1979		DIKHAN	DIRECT APPOINTMENT	
12101- 8104636-5	SHAH JAHAN	GUL DAD		S JALAL BORING		26 May 1982		DIKHAN	DIRECT APPOINTMENT	
12101- 2 8000082-7	AZIZ ULLAH	SAAD ULLAH	DIK GPS I			16 Dec 1982		PAHARPUR	DIRECT APPOINTMENT	
12103- 1490966-3	MUSHTAQ AHMAD	RAB NAWAZ		MITHA PUR KALAN		17 Nov 1983	<del> </del>	PAHARPUR	DIRECT APPOINTMENT	
12103- 1482132-1	ALLAH NAWAZ	MUHAMMAD NAWAZ	DIK GPS	KALA GORH	10 Sep 1962		<del></del>	PAHARPUR	DIRECT APPOINTMENT	,
12013-	GHANI-UR-REHMAN	SHER DIL		NO.1 PAHARPUR	01 Nov 1962		<del> </del>	DIKHAN	DIRECT APPOINTMENT	
12101-	ASEEM KHAN	AZAM KHAN	D <b>ik</b> 2 GPS	GILOTI	01 May 1963			DIKHAN	DIRECT APPOINTMENT	
0961741-7 12101-	MUHAMMAD RASHID	GHULAM JEELANI	DIK GPS	KOKAR GHARBI	10 Sep 1961	05 Sep 1984		DARABAN	DIRECT APPOINTMENT	
0965650-3 12102-	ABDUL SAMAD KHAN	ABDUL GHAFAR	DIK GPS	BASTIBALOCHAN	28 Apr 1961	17 Oct 1984		KALAN	DIRECT APPOINTMENT	
2150050-7 12101-	ABDUL RASHID	IMAM BAKHSH	<b>DIK</b> GM	PS HAZARA PAKKA	15 Oct 1963	17 Oct 1984		PAROVA	DIRECT APPOINTMENT	
0939011-5 12103-	MUHAMMAD ABBAS	ABBUL HUSSAIN SHAH	DIK GPS	S SAID ALIYAN	15 Apr 1965	17 Oct 1984		PAHARPUR	DIRECTION	L
1501762-9	SHAH						•	*		· `

GSNO(3 DIKUAN) 010 = 2014 (10.48 DI	KHANGEGEE	TS TO THE PARTY OF	以中心
12101 SAADULLAH KHAN BULLAH KHAN GPS NO 9 DIKHAN 129.42 DA OF STORE OF STOR	ARABAN N	TS	The Property
1 207 ABRAR AHMAD NISAR		TS	
SHAFQAT ULLAH KHAN BARKATULLAH KHAN BARK	AHARPUR N	TTS .	•
12103- LIAQAT HUSSAIN KHAN KHADIM HUSSAIN KHAN DIKO GPS BAND KURAI 17 Aug 1304	OKHAN N	vits .	
12101- IRSHAD ULLAH MUHAMMAD IQBAL DIR GPS NO IGILOTI	DIKHAN N	VTS .	
12101- MUHAMMAD FAHEEM SALIM NAWAZ EDIK GPS BEHARI COLONY 14 Jan 1988 17 May 2014		NTS	
12 101- NAOEEB ULLAH ABDUL LATIF GPS WANDA HAIBATTI 13 Mar 1964	<del></del>	NTS	
MUHAMMAD BILAL ABDUR REHMAN DIK GPS NO.2 PAHARPUR 06 Jan 1986 17 May 201		NTS	
MUHAMMAD ABBAS KHAN DIK GPS NO.1 TAKWARA 20 APT 1987 03 DEC 200	ROLACIA	NTS	
## 12103- MUHAMMAD IRFAN BASHIR AHMAD DIK 6 GPS RANG PUR SHUMALI 09 Dec 1984 17 May 2014 127.91	7,000	NTS	
7927358-5 F3 12103- MIHIB HUSSAIN SHAH SYED RIAZ HUSSAIN SHAH 24 Apr 1981 05 Dec 2014 127.84 I	- Agendon	NTS	
5196931-7   SIR GPS WANDA NARKANI 04 Feb 1993   17 May 2014   127.73   17 May 2014   127.73   17 May 2014   127.73   18 May 2014   127.73   18 May 2014   18	TABLE OIL		<del> </del>
11201- LASS AD LITISS AT IN SHAH MASROOR HUSSAIN SHAH	PAHARPUR	NTS	
6609430-1 10 Apr 1982 17 May 2014 127.49	DIKHAN	NTS .	
3032309-7 05 Dec 2014 126.77	PAHARPUR	NTS	
1501335-9 1501335-9 17 May 2014 126.62	PAROVA	NTS	
3144698-1 ISRAR MUHAMMAD MUHAMMAD 126.23	PAHARPUR	NTS	
1502464-7 WAHAB 125.50	PAROVA	NTS	
12105- RIAZ ALI KHAN NIAZ ALI KHAN NIAZ ALI KHAN 03 Dec 1985 17 May 2014 125.38	PAROVA	NTS .	
124.54 SHOAIB UR REHMAN GHULAM SUBHANI GHULAM SUBHA	DIKHAN	NTS	
12101- MUHAMMAD ZUBAIR MUHAMMAD JAVEED 124.50	PAROVA	NTS	
12101- HIDAYAT ULLAH MUHAMMAD AFZAL DIKSTOPS BUCHAT	PAHARPUR	NTS	
ABDUL QAYYUM BOX ASIF ABAD US SEP 1788 17 11 121 121 121 121 121 121 121 121 1	KULACHI	NTS ·	
23.67   12102-   IMRAN ULLAH   ABDUL WAHAB   2014   123.87   1216771-9-   17 May 2014   123.87			

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Evilla (II)	12103		MUHAMMAD KHAN EV		PS HASSANI KHEL	10 Mar 1988	17 May 2014	123.850	PAHARPUR	NTS	
	12101	NAZIR AHMAD KHAN	Contract to the second		100		05 Dec 2014	1		NTS .	
	8111998-7	MUHAMMAD ZAFFAR	ALLAH BAKHSH			10 Mar 1991	17 May 2014	123.55	PAHARPUR	NTS .	
	12103- 2562738-1	MUHAMMAD IMRAN	SHER MUHAMMAD		GPS RAJAN PUR			123.29	PAROVA	NTS	
	12101- 0991881-9	MUHAMMAD IBRAHIM	MOLVI IMAM BAKHSH		GPS JATTA	02 Jul 1984	17 May 2014			NTS	
22)	12103- 0447973-9	MUHAMMAD QAYYUM	ROZI KHAN	olica	GPS TOBA	25 Apr 1983	17 May 2014		PAHARPUR		
	12103-	MUHAMMAD IRFAN	MUHAMMAD RAMZAN	iDIK:	GPS NO.2 PAHARPUR	14 May 1986	17 May 2014	122.07	PAHARPUR	NTS	
	9464400-9 12103-	SARDAR KHAN	ABDUL SATTAR KHAN	TDIK.	GPS KHOKHAR	03 Jul 1981	17 May 2014	122.05	PAHARPUR	NTS	
	5710032-5 12101-			Dik	GPS NO 2 GILOTI	15 Mar 1985	17 May 2014	121.91	DIKHAN	NTS	
216	9375468-1	FAZAL UR RAHIM SYED ZAIGHAM ABBAS	ABDUR RAHEEM		GPS KACHA MALLANA	02 Aug 1986	17 May 2014	121.90	PAROVA	NTS	
	12101- 9315198-9	SHAH	GHULAM RASOOL	DIK	NOI .			121.49	DARABAN	NTS	
2270	12104- 6105338-3	SAMI ULLAH	HIDAYAT ULLAH	DK	GPS NO. 1 MUSAZAI	21 Apr 1992	17 May 2014		KALAN	NTS	1
	12101-	MUHAMMAD ZULQARNAIN HAIDER	SAIF UR REHMAN	e DIK	GPS.NO 6 DIKHAN	01 Apr 1988	05 Dec 2014	121.45	DIKHAN		
	12104-	AMIR HAMZA	MAQBOOL AHMAD		GPS KHIARA FATEH MUHAMMAD	13 May 1987	17 May 2014	121.39	KALAN	NTS	
	0478550-3 12101-	MUHAMMAD ARSHAD	MUHAMMAD JAAN	12.65	GPS KURAI	03 Feb 1989	17 May 2014	121.37	DIKHAN	NTS	
	9086383-7 12101-				GPS TEEKIN	02 Jan 1988	17 May 2014	121.17	DIKHAN	итѕ	
	4770275-3	MUHAMMAD SHAFIQ	ABDUL LATIF		GPS CHAH MUNDHR	10 Sep 1984	17 May 2014	119.97	PAHARPUR	NTS	
	12103- 8409583-7	HAFEEZ ULLAH	GHULAM YASIN		WALA			119.96	PAHARPUR	NTS	
2041	12103- 8705620-7	MOHAMMAD ARIF	ABDUL ALEEM	DVK	GPS KURRAR	02 Feb 1980	17 May 2014			NTS	1
225	12101- 5983191-5	MUHAMMAD IQBAL	BASHEER AHMAD	DIK	GPS JHOKE JHEDA	04 Sep 1984	05 Dec 2014	119.96	PAROVA		
246	12101-	MUHAMMAD ASIF	GUL SHER	DIR	GPS WAJHUN	15 Feb 1982	17 May 2014	119.93	PAHARPUR	NTS	
	37337152-1 312103-	JAVED KHAN	SONA KHAN	DIK	GPS BILOT SHARIF	06 Sep 1985	17 May 2014	-119.89	PAHARPUR	NTS	
	5734305-9 12101-		<u> </u>		GPS MOGA	10 Jan 1988	17 May 2014	119.75	DARABAN KALAN	NTS	
48	1764785-7	MUHAMMAD SHOAIB	FAIZ MUHAMMAD				17 May 2014	119.54		NTS	
210	12101- 7534975-9	AURANGZEB	MUHAMMAD SHAFI	DIK	GPS BEHARI COLONY	12 Sep 1985				NTS	
6250	12101- 5594929-7	MUHAMMAD SHAKEEL	KHALIL AHMAD		GPS SULTANIA	12 Apr 1990	17 May 2014	119.47	DARABAN		
2513	12104-	MUHAMMAD JAMSHED	AMIR MUHAMMAD	DIK	GPS NO. I KIRI SHAMOZAI	18 Jan 1988	17 May 2014	119.38	KALAN	NTS	
	2596828-3	<u></u>	<del>\</del>	708.3-33	SHAMOZAI		•		-		• .

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		ed eggs soon of	Striktigen verkis in lind strikter de versionst	The telephone was produced to the second	- 1 C 3 C 3 C 3 C				11927		ris and a second		
		12101-海域。 6127838-1	MUHAMMAD MATI ULLAH	AHMAD SAEED	nik g	PS BEHARI COLONY	10 Feb 1984 A 1	and the second second second	119.23	ALL CONTRACTOR CONTRACTOR	NTS	No the Action of	
			HAFIZ UR REHMAN	FAZAL REHMAN		PS NO.3 MADDI					NTS		1
		12103-	ABDUL GHAFFAR	MUHAMMAD HUSSAIN	ibik (	GPS CHAH LADHA	13 Mar 1986	17 May 2014					1
		5723200-1 12102-	MUHAMMAD IMRAN	SONA KHAN		GPS NO.2 KULACHI	02 Jul 1985	17 May 2014		KULACHI DARABAN	NTS :		-
		4897404-1 12102-		HAKEEM SHAH	A TO THE CASE	GPS NO. 4 DARABAN KALAN	15 Dec 1982	17 May 2014	11006 (	KALAN	NTS	<u> </u>	-
	206	1414606-5 12103-	NAEEM SHAH MUHAMMAD RIAZ UR				09 Nov 1988	17 May 2014	118.83	PAHARPUR	NTS		-
	257 7	8642875-1	REHMAN	SAHIB JAN			17 Aug 1986	17 May 2014	118.62	PAHARPUR	итѕ		
遊游	238	12103- 0254015-9	GHULAM SAMDANI	RAZA MUHAMMAD	<b>英金</b> 子	0,0,0	19 Feb 1984	17 May 2014	118.57	KULACHI	NTS		
	259	12102- 4302096-3	MUHAMMAD RIAZ	HUSSAIN BAKHSH	DIK	GMPS G.RABNAWAZ			118.30	PAHARPUR	NTS		
200	580	12103- 5462943-1	MUHAMMAD ALI	RAIS KHAN	OK-	GPS WANDA LALI	09 Jan 1985	17 May 2014			NTS	<del>                                     </del>	
·		12103-	MUHAMMAD IRFAN	GUL BADSHAH	DIK.	GPS WANDA LALI	04 Jan 1991	17 May 2014	118.06	PAHARPUR		1	-
100		8486125-7 12103-	KAMRAN ALI	GHULAM HASSAN	N.	GPS NO.1 PAHARPUR	03 Dec 1984	17 May 2014	117.75	PAHARPUR	NTS	<del> </del>	-
2014		2043062-1 12103-	MUHAMMAD ZEESHAN	AHMAD NAWAZ		GPS NO.1 PAHARPUR	20 Apr 1987	17 May 2014	117.63	PAHARPUR	NTS	<del> </del>	-
10.00		8169823-5 12101-	AHMAD			GPS NO.1 ABDUL KHEL	03 Jan 1990	17 May 2014	117.53	PAHARPUR	NTS	<del> </del>	_
	264	3036696-5	RIZWAN ULLAH	SHOUKAT ULLAH	100	GPS MOCHIWAL	03 Mar 1986	17 May 2014	117.24	DARABAN KALAN	итѕ		
100 E	765	왕12104- 왕8852999-9_	MUHAMMAD KAMRAN	MULAZIM HUSSAIN	DIK	GPS NO. 1 KOT	<del></del>	17 May 2014	117.20	DARABAN	ттѕ		
N. C.	764	[12102- [1611179-5	ZAKAULLAH KHAN	ATTA ULLAH KHAN		SHAHNAWAZ	30 Apr 1985		116.88	DIKHAN	NTS		
XIETH)	267	12101- 7896018-1	HAJI DILAWAR KHAN	HAJI MIRZA KHAN	20 K	GPS KHUTTI	24 Apr 1989	17 May 2014		_	NTS	<del></del>	
	1268	12102-	HAIBAT KHAN	MUHAMMAD AMEER KHAN	DIK	GPS NO.1 KULACHI	11 Feb 1982	17 May 2014	116.83	KULACHI			-
V. 1		翌5672976-7 第12103-	MUHAMMAD JABBAR	GHULAM RASOOL	ĎΚ	GPS KACHA MALI KHEL	30 Oct 1988	17 May 2014	116.82	PAHARPUR	NTS		-
		0244340-7 12103-		<del></del>	Z DIK	GPS NO.1 ABDUL KHEL	15 Mar 1984	17 May 2014	116.81	PAHARPUR	NTS		
	270	4018813-1	GUL NAWAZ	MUSA KHAN	<b>一种资</b>	GPS NO.1 KULACHI	16 Feb 1983	17 May 2014	116.75	KULACHI	NTS		
		翼 12102- 第12134578-7	TAHIR KHAYYAM	TAUS KHAN		151	02 Jan 1992	17 May 2014	116.49	DIKHAN	NTS		
•	272	12101- 3958240-7	ABDUL BASAT	MAULVI GHULAM HASSAN	-	GPS KOT ESSA KHAN					NTS		
7	277	12101- 0924424-5	MUSHTAQ AHMAD	JUMMA KHAN	bik	GPS KHANA SHARIF	02 Jan 1980	17 May 2014			NTS		_
,	274	12101-	MUHAMAMD RAMZAN	SHER ZAMAN	DIK	GPS GARA MORE	05 Mar 1981	17 May 2014	116.3	DIKHAN			
,	11/2/15	7034423-1				#					•		

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	THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER.	MUHAMMAD ZUBAIR	ABDUL SATTAR KHAN		GPS WANDA UMARI		17 May 2014	11633	PAHARPUR T	NTS W		· 经
	6799253-7	KHAN	The state of the s		The state of the s	A STATE OF THE STA	17 May 2014	CACSTLL GOOD AND	PAHARPUR	NTS		
276	8271339-1 12103-	MUHAMMAD YOUNAS	GANMON			25 Mar 1992	17 May 2014	116.13	PAHARPUR	NTS •		
	6940574-7	TAHIR KHAN	HAJI NADIR KHAN		015110,111222			115.87	DIKHAN	NTS .		1
278	គ្គ 12 101- ធ្វី 5583256-9	SANA ULLAH	MUHAMMAD HANIF	PDK.	GPS JK/ QURESHIAN	23 Mar 1987	17 May 2014			NTS		1
31,279	12101- 8289665-1	ASIF ULLAH	GHULAM JAN	ank.	0.5	04 Feb 1988	17 May 2014	115.70				-
2 280	12101- 30924552-5	ALLAH BAKHSH	SARDAR BAKHSH	рıқ	GPS JHOKE TARHELI NO.02	26 May 1983	17 May 2014	115.55	PAROVA	NTS		-
	¥12101-	MUHAMMAD YASEEN	MUHAMMAD AMIN	DK.	GPS NO.10 DIK	20 Sep 1972	17 May 2014	115.49	DIKHAN	NTS		-
	집7341749-1 급12103-	SHOUKAT ULLAH	GHULAM MUHAMMAD	DIK	GPS UDWAL	07 Apr 1990 '	17 May 2014	115.46	PAHARPUR	NTS		
	3921303-3 312101-		ABDUL MAJID		GPS BASTI DIRKHAN	15 Apr 1985	05 Dec 2014	115.36	DIKHAN	NTS		
283	6829025-5	NAVEED AHMED		<b>A</b> 4	GPS BHITANIAN	01 Nov 1984	05 Dec 2014	115.08	PAHARPUR	NTS		
2284	7312799-1	GHULAM MOHAY UD DIN	MUHAMMAD RAMZAN	20 N H			17 May 2014	115.05	KULACHI	NTS		1
*C285*	到 12 102- 第 99 2 7 4 0 7 - 1	MUHAMMAD KHALID	ABDUL MAJEED	44.57	GPS NO.3 MADDI	20 Jan 1988		<del> </del>	PAHARPUR	NTS		7
2.4	約12103- 約1413344 <u>-3</u>	SHEIKH JAWAD AHMAD	SHAIKH RIAZ AHMAD	DIK!	GPS CHISTIA RIZWIA PHP	31 Dec 1987	17 May 2014	115.02			<del> </del>	-
	12103- 9151950-7	MUHAMMAD ARIF	GHULAM HUSSAIN		GPS BILOT SHARIF	20 Mar 1983	17 May 2014	114.89	PAHARPUR	NTS	<u> </u>	-  '
7 288	12103- 1779028-7	MUHAMMAD BILAL	RAB NAWAZ	DK	GPS TOBA	01 Apr 1992	17 May 2014	114.56	PAHARPUR	NTS	<u> </u>	
	12101-	MUHAMMAD ZAFRAN	HIDAYAT ULLAH SHAKIR	FO.K	GPS NO. 11 DIKHAN	15 May 1989	17 May 2014	114.52	DIKHAN	NTS	ļ	_
	3224864-I 12101-	MUHAMMAD BARAN	MAKHAN KHAN	DIK	GPS NO. 2 HAJI MORA	20 Mar 1979	05 Dec 2014	114.47	DIKHAN	NTS		
	0915691-1 12101-	MUHAMMAD QAISER			GPS DARABAN KHURD	01 Oct 1986	17 May 2014	114.42	PAROVA	NTS	,	
291	0409535-9	KHAN	SANWAL KHAN		<u> </u>	17 Apr 1986	17 May 2014	114.40	DIKHAN	NTS		
\$2928 \$290	7672606-I	ASMAT ULLAH	KHUDA BAKHSH		GPS KOTLA SAIDAN	-		<del></del>	DIKHAN	NTS		
22916	्रिया । 2101- ्रेडिय 228351-9	AZIZ ULLAH	ALLAH WASAYA	DIK	GPS HISSAM	30 Apr 1986	17 May 2014	114.25	<u></u>			-
Sel 2941	製12101- 製0945908-3	MUHAMMAD BILAL	MALIK SOOBA	DIK	GPS RANGPUR JANUBI	12 Dec 1981	17 May 2014	114.20	PAROVA	NTS	<del></del>	
2295	12103- 1502759-7	ASMAT ULLAH	MUHAMMAD KHAN	DIK	GPS NO. 1 DHALLAH	01 Jan 1978	25 Feb 2017	114.15	PAHARPUR	NTS		-
206	12102-	MUHAMMAD TARIQ	GHULAM MUSTAFA	Pork	GPS NO.1 RORRI	05 Oct 1990	17 May 2014	114.06	KULACHI	NTS	<u>.  </u>	_
	12101-	MOHAMMAD ATIF	AMANULLAH		GPS KURAL	18 Apr 1983	05 Dec 2014	113.84	DIKHAN	NL2·		
	7191837-1	SHAHID		25.04			<u></u> .					

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11716 12102- 11716 1010340-2	DILAWAR SHAH	YAQUB SHAH	DIK.	GPS FATEH ALI	27 Apr 1984	05 May 2017	106 62 1	DARABAN KALAN	NTS	
12101- 1721- 1201- 1721- 1208009-7	ZIA UR REHMAN	JUMMA KHAN .		GPS HATHALA	26 May 1990	05 May 2017	107.37	KULACHI	NTS .	
12105-	SAMI ULLAH MALIK	QUDRAT ULLAH	DIS	GPS GARA AASHIQ	30 Apr 1993	05 May 2017	107.33	PAROVA	NTS	
0352676-5 12103-	MUHAMMAD TARIQ KHAN	MUHAMMAD RIAZ	ole.	GPS HAJI KHEL	27 Feb 1991	05 May 2017	106.92	PAHARPUR	NTS	
2822984-7 12102-			DIK 4	GPS GARA BAKHSHA	03 Mar 1996	05 May 2017	106.40	DIKHAN .	NTS	
5400765-7 12103-	KIFAYATULLAH KHAN	ABDULLAH JAN	DK	GPS YARI KHEL	03 Feb 1987	05 May 2017	106.13	PAHARPUR	NTS	
1242358-1	SIRAJ UD DIN	ZAHOOR US DIN	DI.	GPS GARA MOHABBAT	29 May 1992	27 Sep 2017	106.11	KULACHI	NTS	
8289497-5 12101-	ALI ASGHAR		DIK	GPS WANDA HAIBATTI	01 Jan 1989	05 May 2017	105.68	DIKHAN	NTS	
8060378-1 204-38-4-12103-			DIK.	GPS UMER KHEL	02 Mar 1992	27 Sep 2017	103.67	PAHARPUR	NTS	
2610033-3 12101-			李李学	GPS KOKAR GHARBI	03 Jan 1996	05 May 2017	102.23	DIKHAN	NTS	
3779757-5 12101-	SYED FARMAN ALI SHAH MUHAMMAD WAQAR			GPS KOKAR GHARBI	11 Dec 1996	05 May 2017	102.23	DIKHAN	NTS	
2538743-3 12101-	KHAN			GPS NO. 2 POTA	26 Nov 1991	05 May 2017	101.65	DIKHAN	NTS	,
2782462-5 12102-	ABDUL RAUF	. J		GPS KOT ATAL SHARIF	25 Dec 1990	05 May 2017	101.51	KULACHI	NTS	
6047043-1 12103-	MUHAMMAD RAFIQ		200	GPS KACHI KATH GARH	02 Feb 1986	05 May 2017	100.96	PAHARPUR	NTS	
11184 4624642-1 12101-	KHALID AZIZ MUHAMMAD IKRAM				15 Sep 1992	05 May 2017	100.18	DIKHAN	NL2	
0839585-5	ULLAH			GPS JEEWAYA SAHI	<del> </del>	05 May 2017	100.05	PAROVA	NIS	
12101- 1186 0935010-3	MUHAMMAD IQBAL			GPS MIALI	10 Jun 1982	<del></del>	97.95	DIKHAN	NTS	<del> </del>
12101- 1187 5668286-1	MUHAMMAD ZEESHAN			GPS KOKAR SHARQI	11 Sep 1996	05 May 2017	-	<del> </del>	NTS	
1188 1690406-1	FARID ULLAH	AZIZ ULLAH	DIC	GPS SHERU KOHNA	29 Dec 1992	05 May 2017	96.31	DIKHAN		
1189 1189 0982330-5	KHALIL AHMAD	GHULAM RASOOL	DIK	GPS ZAFFAR ABAD COLONY	12 Dec 1981	05 May 2017	96.02	DIKHAN	NTS	<u> </u>
119024 119024 119024 130313868-3	MUHAMMAD KHALID	MUHAMMAD AKBAR	DIK	GPS SHERU KOHNA	14 May 1990	05 May 2017	95.62	DIKHAN	NTS	
12101- 2119181 20755069-3	MUHAMMAD TARIQ BILAL	ABDUL WAHEED	ЮK	GPS DARRABRI	11 Apr 1984	05 May 2017	95.35	DIKHAN	NTS	
1192 1192 1192 1192 1192 1194 1297 1297 1297 1297 1297 1297 1297 1297	MUHAMMAD KHALIL	ABDUL RASHEED		GPMS KOTHA DARKHAN	20 Aug 1989	05 May 2017	93.28	KALAN	NTS	-
12105-	SABIR SHAH	KHAIR SHAH	DIK	GPS POTA DADANZAI	06 Feb 1986	05 May 2017	93.02	DARABAN KALAN	NTS	<u> </u>
[360545-3	<u> </u>		- T. T. L. L. C.	<b>D</b>						

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DECEASED SON / MEDICAL BOARD QUOTA
DI BO

CHAIRMAN: MUHAMMAD SHAFIQ

MEMBER 1: ASIM SAEED

MEMBER 2: MUHAMMAD DANISH ROOMAN

My Edincation officer

District Edincation officer

#### 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