

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.



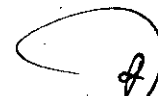
(Salah-Ud-Din)
Member (J)
Camp Court D.I.Khan

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

3.03.2022

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.



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

3/6



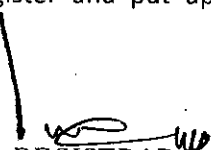

(Salah-Ud-Din)
Member (J)
Camp Court D.I.Khan

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - 7539 /2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/10/2021	<p>The appeal resubmitted today by Mr. Muhammad Anwar Awan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR.</p> <p>This case is entrusted to S. Bench at Peshawar. Notices be issued to appellant/counsel for preliminary hearing to be put up there on <u>06/12/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal presented by Mr. Sana Ullah Shamim Gandapur Advocate today i.e. on 19/07/2021 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 in respect of appellant 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 1363 /S.T,

Dt. 19/07 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

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

Respected Sir,

Addresses as per rules is completed. Name of appellant is highlighted. copy of departmental appeal is annexed. All ~~other~~ better copies of Annexure are legible. Photostate copies objection is rectified. One copy of member is attached. Appeal is signed and annexures are flagged. Annexure are duly attested. Appeal are duly paged and certificate is given. Copies of amended respondents are attached. The objection received on 27-7-2021 are duly rectified.

Anwar Adv

Reference your reply submitted in response to our observation, it is reiterated that the objections/observations raised by this office at serial no. 3, 4, 12 and 14 have not been removed and still stand. Therefore, the appeal in hand is returned for removing the above mentioned observations and resubmission within 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

The objections are rectified and removed.

Anwar
Adv.

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Case Title: Abdul Ghaffar CHECK-LIST VS Govt of KPK etc

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

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

Name:

M. Anwar Awan ASE

Signature:

Anwar

Dated:

03/08/2021

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

Appeal no. 7539 of 2021.

Abdul Ghafar

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	B	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	14-15
7	Copy of Departmental Appeal	F	16-19
8	Wakalat Nama	G	20

Your humble Appellant

Abdul Ghafar
Through Counsel


Muhammad Anwar Awan
Advocate Supreme Court.

- 1 -

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR Camp A.T.D.I.Khan**

Service Appeal No 7539 /2021

ABDUL GHAFAR PST GPS JALALA. U/c Miran. P
s/o Malkoo R/o Miran Tehsil Parova.
(Appellant)

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7304

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.

Miran

Miran
M. AMYAR AWAZI
Advocate Supreme Court
D.I.Khan

Miran

Filed to-day

Registrar

- 6 ~~1~~ AQAL KHAN GPS NO.1 REHMANIKHEL DISTT: D.I.KHAN
- 7 ~~2~~ ZIA UR REHMAN GPS NO.1 REHMANIKHEL DISTT: D.I.KHAN
- 8 ~~3~~ HIZBULLAH KHAN GPS NO.1 TAKWARA DISTT: D.I.KHAN
- 9 ~~4~~ MUHIB HUSSAIN SHAH GPS NO. 2 DHALLAH DISTT: D.I.KHAN
- 10 ~~5~~ ASSAD HUSSAIN SHAH GPS WANDA TALGI DISTT: D.I.KHAN
- 11 ~~6~~ ABDUR RAUF KHAN GPS KOT MASOODAN DISTT: D.I.KHAN
- 12 ~~7~~ 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 1 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:

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.

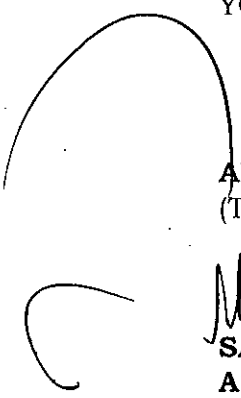
OR

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


ABDUL GHAFFAR
(Through Counsels)


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

KANEEZ BATOOL
Advocate High Court D.I.Khan

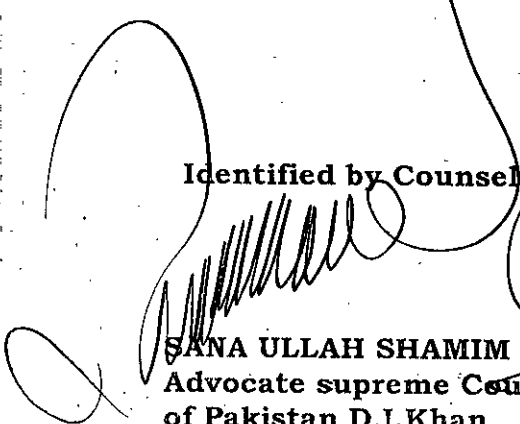
AFFIDAVITE

I, **ABDUL GHAFFAR PST GPS JALALA**. 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

12101-7958647-3

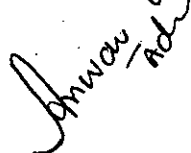
Identified by Counsel;


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



Certificate:-

It is certified that no appeal on similar subject matter is filed before Hon'ble Tribunal.


Muhammad Kamran
Advocate

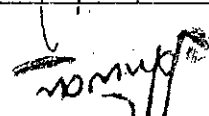
**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DERA ISMAIL KHAN**

- 5 -

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.	1760002	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 AHMD	12101-2011550-9	109.58	GPS GARA HASSANI	CHEHKAN
4.	1760368	MUHAMMAD RAMZAN	SHER ZAIBAN	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.	1766832	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


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

S.No	Roll No	NAME	FATHER'S NAME	CNIC	SCORE	PLACE OF POSTING	UNION COUNCIL
575	1760704	HIDAYAT ULLAH	MALIK EIDU	12101-6838998-5	109.69	GPS BHUTAISSER SHERQI	MIRAN
576	1764006	GHULAM QASIM	MAKHAN KHAN	12101-1345381-1	74.87	GPS CHIRI BHORE	MIRAN
577	1760214	MUHAMMAD ASGHAR	GHULAM RASOOL	12101-1016267-3	79.54	GPS GISHKORI	MIRAN
578	1763907	MUHAMMAD ZAREEF	SAEED AHMAD	12105-0344849-3	72.66	GPS GISHKORI	MIRAN
579	1760520	ABDUL CHAFFAR	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	RABNAWAZ KHAN	12105-0351241-7	71.96	GPS JH; MACHIAN	MIRAN
582	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 MUHAMMAD	FAIZ MUHAMMAD	12101-3714132-7	70.93	GPS MIREN	MIRAN
585	1762084	RIAZ ALI KHAN	NIJAZ ALI KHAN	12101-5193915-9	125.5	GPS NO. 1 RAMAK	MIRAN
586	1760087	AMIR MUHAMMAD	FAQIR MUHAMMAD	12101-0336780-5	112.42	GPS NO. 1 RAMAK	MIRAN
587	1761996	SHAH NAWAZ	HAQ 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	1760515	ABDUL QAYYUM	HAQ NAWAZ	12101-1742307-9	84.32	GPS NO. 1 RAMAK	MIRAN
590	1762190	KIFAYAT ULLAH	IMAM BAKHSH	12101-2755369-9	78.13	GPS NO. 2 RAMAK	MIRAN
591	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 RIZWAN	MUHAMMAD RAMZAN	12101-5192880-1	98.29	GPS GARA ASHIQ	Naivela

M. Anwar
Advocate Supreme Court
R.I. Khan
ACCEPTED

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 TAADA 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.

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

Atul

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.

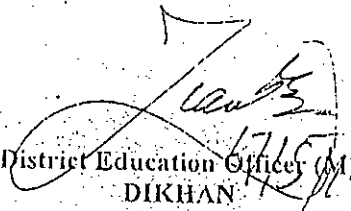
Zia-ud-Din
District Education Officer (M)
DIKHAN

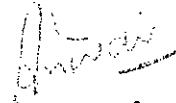
Endst No. 7135-7765 /PST(M) NTS

Dated DIKhan 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.


District Education Officer (M)
DIKHAN


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

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
486	1762086	IMDAD 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	1762318	MUHAMMAD YOUNIS	90.01	GPS CHAH ROSHAN	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0951527-9
488	1760692	ISRAR MUHAMMAD	126.62	GPS JHOKE GUMLA	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-3144698-1
489	1760674	ALLAH BAKHSH	115.55	GPS JHOKE KHALIAR	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0924552-5
490	1763765	MUHAMMAD MUNAIR ADIL	84.78	GPS JHOKE KHALIAR	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-3610423-7
491	1763971	MEHTAB AHMAD	88.41	GPS JHOKE LADHU	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-4278166-3
492	1762971	MUHAMMAD IRFAN	87.59	GPS JHOKE OBHAYA	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-5574067-1
493	1762441	AZIZULLAH	90.03	GPS KOTAH MAHBOOB	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0935425-7
494	1763550	MUHAMMAD ASIF	101.75	GPS N A JH KHALIAR NO. 1	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-2520476-7
495	1761990	ABDUR RASHID	86.9	GPS NAI ABADI JH; KHALIAR NO. 2	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0779319-9
496	1763838	SYED ZAIGHAM ABBAS SHAH	121.9	GPS PACCA MALANA	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-9315198-9
497	1762392	MUHAMMAD YASIR BASHIR	113.69	GPS NO. 2 KACHA MALANA	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0992411-7
498	1763283	TANVEER KHAN	89.52	GPS NO. 2 KACHA MALANA	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0502400-5
499	1760392	MUHAMMAD ZUBAIR	85.4	GPS PACCA MALANA	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-4965071-9
500	1763567	MUHAMMAD ISMAIL	90.46	GPS SHALA SHARIF	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-2312297-3
501	1760285	MUHAMMAD RAMZAN	81.74	GPS WANDA BALOCHAN GU	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-7666772-5
502	1760809	ARSHAD MAHMOOD	81.4	GPS WANDA BALOCHAN QOS	Malana	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0957017-5
503	1763027	KIFAYAT ULLAH	72.07	BASTI LONG	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-1345381-1
504	1760704	HIDAYAT ULLAH	109.69	GPS BHUTAI SEROI	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-7646050-5
505	1764006	GHIJLAM QASIM	74.87	GPS CHIRI BHIOR	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-3714132-7
506	1760214	MUHAMMAD ASGHAR	79.54	GPS GISHKORI	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-6838998-5
507	1763907	MUHAMMAD ZAREEF	72.66	GPS GISHKORI	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12105-0344849-3
508	1760520	ABDUL GHAFFAR	86.43	GPS JALALAH	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-7958647-3
509	1763215	AKHTAR MUNIR	81.79	GPS JH; HAYAT	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0974828-9
510	1762112	NASIR MAHMOOD KHAN	71.96	GPS JH; MACHIAN	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0974828-9
511	1760793	SANA ULLAH	87.01	GPS JH; MUHAMMAD AMINE	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-6678663-9
512	1760530	MAQBOOL AHMAD	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 MUHAMMAD	70.93	GPS MIREN	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-3714132-7
514	1762084	KIAZ ALI KHAN	125.5	GPS NO. 1 RAMAK	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12105-0354017-3
515	1760087	AMIR MUHAMMAD	112.42	GPS NO. 1 RAMAK	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	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	90.99	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 QAYYUM	84.32	GPS NO. 1 RAMAK	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-1742307-9
519	1762190	KIFAYAT ULLAH	78.13	GPS NO. 2 RAMAK	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-1016267-3
520	1763228	GULZAR KHAN	91.13	GPS SARA GARA	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0346352-9
521	1760620	IHSAN ULLAH	82.19	GPS SARA GARA	Miran	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12105-0341593-1
522	1760911	MUHAMMAD IQBAL	100.37	GISHKORI BALA	Naivela	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-5695108-9

[Handwritten signatures and marks]

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. ARWAF AWAN
Advocate Supreme Court
D.I.Khan



GOVERNMENT
OFFICE OF THE DISTRICT
EDUCATION OFFICER (MALE)

DERA ISMAIL KHAN

GOVERNMENT
OFFICE OF THE DISTRICT
EDUCATION OFFICER (MALE)

Endst: No. 11728 / 1

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

Endst: 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 DFO (Male) DIKhan.


DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN

M. Anwar
Advocate Supreme Court
DIKhan

-DT

-13-

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Amme... (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.

[Signature]
24/6/2020
Assistant Director (Etab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

Copy forwarded to the:-

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

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

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

14-1

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)

M. A. AHMAD
Advocate Supreme Court
Dera Ismail Khan

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 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	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	IMAM BAKHSH	DIK	GMPS HAZARA PAKKA	15 Oct 1963	17 Oct 1984		PAROVA	DIRECT APPOINTMENT	
10	12103-1501762-9	MUHAMMAD ABBAS SHAH	ABDUL HUSSAIN SHAH	DIK	GPS SAID ALIYAN	15 Apr 1965	17 Oct 1984		PAHARPUR	DIRECT APPOINTMENT	

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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	12101-7958647-3	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	ILAH 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 YARIK	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	12101-1470463-1	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

Handwritten signature/initials

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- F -

Received
29/03/21

D. NO # 5,84
22/03/21

- 16 -

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

Subject: Appeal against the Seniority/promotion order of PST (BPS-12) & 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 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 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").

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

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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")

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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 "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.

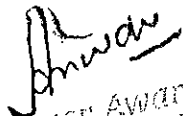
Last but not the least, there are several paradoxes in the Seniority/promotion orders of primary school teachers of NTS based 2014.

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 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, 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. AMIR AWAN
Advocate Supreme Court
D.I.Khan

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-18-

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


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

- List of PST GPS
- (1) مولانا PST GPS شہزادہ محمد امجد 0345-7373705
 - (2) امجد حسین PST GPS محمد رفیع ذیل 0346-7776732
 - (3) احسان اللہ PST GPS محمد امجد 0346-7878562
 - (4) عبداللطیف PST GPS صاحب ذیل 0345-9839260
 - (5) عبدالغفار PST GPS محمد امجد 0343-7988866
 - (6) عبدالقیوم PST GPS محمد امجد 03444090874
 - (7) شہزادہ PST GPS محمد رفیع ذیل 0342-2653616
 - (8) عتیق عباس PST GPS محمد رفیع ذیل 0345-9849865
 - (9) محمد رفیع PST GPS محمد رفیع ذیل 0344-8546979
 - (10) گلزار علی بی بی
 - (11) محمد امجد
 - (12) گلزار علی بی بی
 - (13) ظاہر شاہ
 - (14) محمد امجد
 - (15) عارف اللہ
 - (16) محمد امجد
 - (17) محمد امجد

M. Anwar
 Gulistan
 Islamabad
 Pakistan
 Advocate
 Supreme Court
 D.I. Khan

- (18) محمد امجد PST GPS جادو نگر 0313-2452434
- (19) حاجی امجد " " سندھوہ ٹول پلازہ 0345-2996815
- (20) محمد علی " " راجہ شعلین 0345-9834832
- (21) محمد بلال " " سندھوہ ٹول پلازہ 0346-1951252
- (22) محمد امجد " " بابی شمالی 0346-9467336
- (23) عابد حسین " " ٹول پلازہ 0345-9872124
- (24) ناصر محمد PST " " جی ایس ٹی
- (25) اختر ضیہ PST " " جی ایس ٹی
- (26) حاجی محمد PST " " جی ایس ٹی
- (27) عیاد قائم " " جی ایس ٹی
- (28) فدا محمد " " جی ایس ٹی
- (29) محمد اصغر " " جی ایس ٹی
- (30) رحمت اللہ " " جی ایس ٹی
- (31) امجد اللہ " " جی ایس ٹی
- (32) رحمت اللہ " " جی ایس ٹی

Anwar
 Advocate Supreme Court
 D.I. Khan

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

SERVICE APPEAL No. 7509/21

Syed Sohail Ahmad Shah Gillani & 33 VS

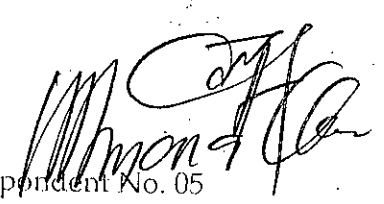
Government of KPK

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04	Authority		14

S.A. no. 7539/2021

Abdul-ghafar.


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

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.

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(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

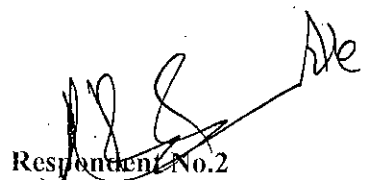
1. Para pertains to the appointment of appellants on 17-05-2014 and respondents appointments on 05-12-2014.
2. Para pertains to the regularization of appellants on 10-03-2018.
3. Para pertains to the seniority list of appellants issued by DEO (M) D I Khan. On 04-06-2020. Where as the departmental appeals 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.

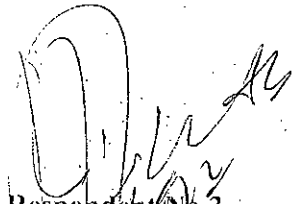
Grounds

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.

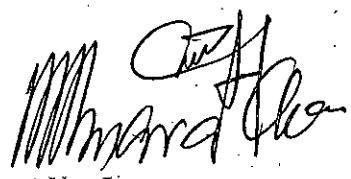
So it is humbly prayed that appeal of appellant may kindly be dismissed with Cost.

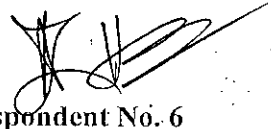
Respondent No.1
The Chief Secretary E&SE KPK
Peshawar

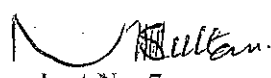

Respondent No.2
The Secretary E&SE KPK
Peshawar

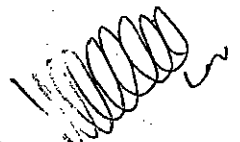

Respondent No.3.
Director E&SE KPK
Peshawar


Respondent No. 4
Assistant Director Estab KP
Peshawar

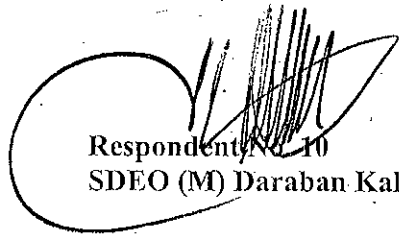

Respondent No. 5
District Education Officer
(M) D I Khan


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. Ssheel along with 33 being same
M. Kamran Khan and identical nature
06.08.2022. M. Kamran

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

Assistant Advocate General
Khyber Pakhtunkhwa
Services Tribunal Peshawar
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.

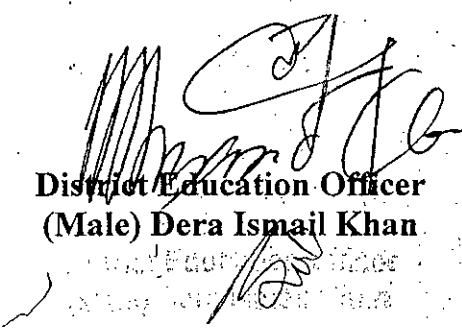
Sd/-

**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 Hummat D.I.Khan (Member) *Asim Saeed*
3. Mr. Muhammad Danish Roman Khan SST-JT, GHS No.5 D.I.Khan (Member) *Danish Roman Khan*

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	DIVISION	PRESENT PLACE OF POSTING	DATE OF BIRTH	DATE OF TAKING CHARGE	SCORE	TEHSIL	METHOD OF APPOINTMENT	REMARKS
Per	12101-8104636-5	SHAH JAHAN	GUL DAD	DIK	GMPS JALAL BORING	17 Mar 1961	01 Feb 1979		DIKHAN	DIRECT APPOINTMENT	
Per	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	
Per	12101-0965650-3	MUHAMMAD RASHID	GHULAM JEELANI	DIK	GPS KOKAR GHARBI	10 Sep 1961	05 Sep 1984		DIKHAN	DIRECT APPOINTMENT	
Per	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	ABDUL HUSSAIN SHAH	DIK	GPS SAID ALIYAN	15 Apr 1965	17 Oct 1984		PAHARPUR	DIRECT APPOINTMENT	

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

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

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

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

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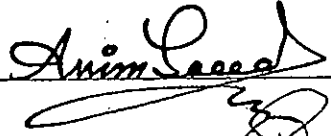
1171	12102-1010340-2	DILAWAR SHAH	YAQUB SHAH	DIK	GPS FATEH ALI	27 Apr 1984	05 May 2017	108.57	DARABAN KALAN	NTS	
	12101-4208009-7	ZIA UR REHMAN	JUMMA KHAN	DIK	GPS HATHALA	26 May 1990	05 May 2017	107.37	KULACHI	NTS	
	12105-0352676-5	SAMI ULLAH MALIK	QUDRAT ULLAH	DIK	GPS GARA AASHIQ	30 Apr 1993	05 May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

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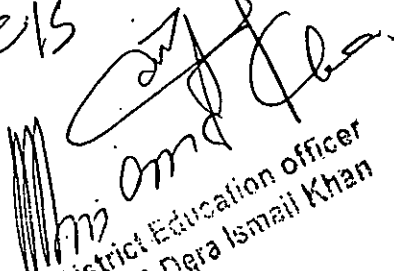
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1194	12101-8047233-5	RISHI HANS	HEERA LAL	DIK	GPS NAI ABADI KOTLA SAIDAN	12 Jul 1996	05 May 2017	90.48	DIKHAN	NTS
1195	12101-7464937-1	SHAFQAT ULLAH	MUHAMMAD AMEEN	DIK	GPS JEEWAYA SAHI	13 Aug 1988	27 Sep 2017	90.37	DIKHAN	NTS
1196	12101-0970848-7	SHANKAR	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 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 

els

 District Education officer
 (Male) Dera Ismail Khan

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

SERVICE APPEAL No. 7509/21

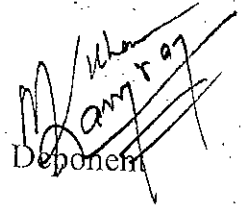
Syed Sohail Ahmad Shah Gillani & 33

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