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. 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.

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

Reader Note, Previous date was changed on therefore, notices be issued to private respondents No. 6 to 12 for submission of reply/comments through registered for submission of come up Adjourned. To 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).02.2022

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

Appellant Autorited _ocurity

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

FORM OF ORDER SHEET

Court of	•	

S.No.	Date of order	Order or other proceedings with signature of judge
	proceedings	order of other proceedings with signature of judge
1	2 .	3
1.	06/10/2021	The appeal resubmitted today by Mr. Muhammad Anwar Awar
		Advocate may be entered in the Institution Register and put up to the
		Worthy Chairman for proper order please.
		REGISTRAR
2-		This case is entrusted to S. Bench at Peshawar. Notices be issued to
	. في	appellant/counsel for preliminary hearing to be put up there on
i	-	06/12/21
		CHARMAN
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Reference your reply submitted in response to our observation, it is reiterated that the objections/observations rose by this office at serial no. 4, 12 and 14 have not been removed and still stands. Therefore, the appeal in hand is returned for removing the above mentioned observations and resubmission with 15 days.

Dt.__ /2021

REGISTRAR SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

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

R/s,

The objections are each fied.

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.

- 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.
- (2) 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.

 Ψ Check list is not attached with the appeal.

92 more copies/sets of the appeal along with annexures i.e complete in all respect may also be submitted with the appeal.

No. 1345 /S.T,
Dt. 19/07 /2021

REGISTRAR SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Supreme Court at D.I.Khan

Perperted Sik,
The addresses of appellant and Ruppondents are in accordance with service Rules as mentioned in accordance with service Rules as mentioned in accordance with service Rules are heatified. All the servicinity list. Copy of depastmental appeal is attached. Photostate Copies are heatified. All the attached. Photostate Copies are heatified on now legible. One arrenues are hutified on now legible. One consenses after the flages. Various member is attached and attention. Certification of attached with appeal copies from the copies of attached with appeal copies from the copies attached with appeal copies from the copies of attached with appeal copies of attached with appeal copies from the copies of attached with appeal copies from the copies of attached with appeal copies of attached with a provide attached with a particular appeal copies of attached with a particular appeal appeal attached with a particular appeal appeal appeal attached with a particular appeal a

CHECKLIST CHECKLIST CONT OF KPK CTE

Cas	ie lille: Kab Nawa? 15 (novi gr	MY	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
SH	CONTENTS	YES	NO
1	This Appeal has been presented by: M. ANWAY AWANA	5e	
2	Whether Counsel/Appellant/Respondent/Deponent have signed		· /
2	the requisite documents?		
. 3	Whether appeal is within time?	~	1
4	Whether the enactment under which the appeal is filed		
5	mentioned? Whether the enactment under which the appeal is filed is correct?		, -
- 6	Whether affidavit is appended?		
	11111	-	
7	Whether affidavit is duly attested by competent Oath I Commissioner?		_
8	Whether appeal/annexures are properly paged?		
9	Whether certificate regarding filing any earlier appeal on the		
9	subject, furnished?		,
10	Whether annexures are legible?		,
11	Whether annexures are attested?		
12	Whether copies of annexures are readable/clear?		1
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?	V/	<u>, </u>
15	Whether numbers of referred cases given are correct?	\mathcal{U}	
16	Whether appeal contains cutting/overwriting?		No
17	Whether list of books has been provided at the end of the appeal?		1
18	Whether case relate to this court?		
19 1 20	Whether requisite number of spare copies attached?	V	7
20	Whether complete spare copy is filed in separate file cover?		-
. 21	Whether addresses of parties given are complete?	<u> </u>	
22 23		\ <u>\</u>	
		/	
,- 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		
:	Whather copies of company of the control of the copies of	 	
26	The section of the se		
27	Whether copies of comments/reply/rejoinder provided to	 	
2/	opposite party? On		}

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

Name:

Signature: Dated:

03/08/2021

I EFORE THE KPK SERVICE TRIBUNAL PESHAWAR CAMP COURT DERA ISMAIL KHAN.

Rab Nawaz

Govt Of KP& Others

INDEX

No.	Particulars	Annexure	Pages
1	Appeal		1-5
2	Copy appointment order	A	6-8
.3	Copy of Regularization Order	В	9 _ 10
4	Copy of Office order Dated 04-06-2020.	C	11
5	Copy of orders dated 24-06-2020	D	12
6	Copy of Seniority List	E	13 - 14
7	Copy of Departmental Appeal	F	15-18
8	Wakalat Nama	. G	19

Your humble Appellant

Rab Nawaz

Through Counsel

Mohammad Anwar Awan Advocate Supreme Court.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No 7537 /2021

RAB NAWAZ PST GPS NORANG UTRA. Cheh kan DI Khan. S/o Gul Sher R/o Naviang Utra U/c cheh kan DI Khan. (Appellant)

Khyber Pakhtukhwa Service Tribunal;

VERSUS

Diary No. 23/2

Dated 15/7/2021

- 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.

Junas

A THU OT AW COURT

Filedto-dag

Registrar

6. . AQAL KHAN GPS NO.1 REHMANIKHEL DISTT: D.I.KHAN

7. .. ZIA UR REHMAN GPS NO.1 REHMANIKHEL DISTT: D.I.KHAN

2. . HIZBULLAH KHAN GPS NO.1 TAKWARA DISTT: D.I.KHAN

. MUHIB HUSSAIN SHAH GPS NO. 2 DHALLAH DISTT: D.I.KHAN

. . ASSAD HUSSAIN SHAH GPS WANDA TALGI DISTT: D.I.KHAN

A. . . ABDUR RAUF KHAN GPS KOT MASOODAN DISTT: D.I.KHAN

. . . 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 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.

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 APPICLLANT

DATED: /06/2021

RAB NAWAZ

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

KANEEZ BATOOL Advocate High Court D.I.Khan

AFFIDAVITE

I, RAB NAWAZ PST GPS NORANG UTRA. 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

dentified by Counsel;

W

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

Tommad Kamran Advocasion Commission Reserved

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No		_ /2021
11	 	 - /

RAB NAWAZ VERSUS GOVT OF K.P.K etc.

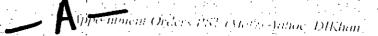
BOOKS REFERED;

- > Constitution of Islamic Republic of Pakistan 1973.
- > Service Laws.
- > Case laws.

VERIFICATION; / Cestificate.

I, **RAB NAWAZ**, verify that it is the first Appeal and no such Appeal has ever been preferred in this honorable Tribunal by the Appellant and all the contents of above Appeal/petition are true and correct.

RAB NAWAZ





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

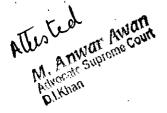


APPOINTMENT

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

S, Na	Roll No	NAME	FATHER'S NAME	CNIC	SCORE	PLACE OF POSTING	UNION	
	 		DERA IS	MAIL KHAN	v ·	<u> </u>	COUNCIL	
i.	1760062	MUAHAMAD SHAHID	QAYYUM NAWAZ	121.01- 62.96930-3	93.5	GPS DARWESHA	СНЕНКАМ	
2.	1760177	BASHIRMAD	MUHAMMAD AFZAL	12 <u>10</u> 1- 8038430-1	97.19	GPS GARA BALA	CHEHKAN	
3,]17 6 0752	NAVEED AHMAD	NAZIR AHMD	12101- 2041550-9	109.58	GPS CARA HASSANI	CHEHKAN	
1.	1760368	ATUHAMAM) RAMZAN	SHER ZAMAN	1210 <u>1</u> - 7034423-1	116.35	GPS GARA MORE	CHÈITKAN	
5. 	1760733	RAHMAT ULLAH	SARFARAZ	12101- 5709320-3	95.33	GPS HAINDAN	СПЕНКАМ	
í	1760335	MAZHAR IQBAL	MUHAMAAD JQBAL	4536514-5 87.57		GPS JARDI SINDH	CFUHKAN	
7. <u>-</u> -	1761263	ABBAS	MUHAMMAD RAMZAN	1210J- 1989179-5	109.62	GPS JEVAYA SAIII	СПЕНКАМ	
[₹] . :-	1760735	MUHAMMAD SALEEM¦	KARIM BAKHSH .	12101 · 0972120-3	117.46	GPS NO. 2 POTA	СПЕНКАМ	
<i>'.</i>	1762690	MUHAMMAD NADEEM AKHTAR	MUHAMMAD ASLAM	12i01- 3818810-5	87.92	GPS NO. 2 POTA	СНЕНКАМ	
0.	176-1200	RAB NAIVAZ	GUL SHER	12101- 7539649-3	95.9	GPS NURANG UTRA	CHEHKAN	
1.	176-1043	ABDUL BASAT	MAULVI GHULAM HASSAN	12101- 3958240-7	116,49	GPS SHERU KOIINA	CHEHKAN	
3.		SANA ULLAH	GHULAM QADIR	12101 9636197-3	88.45	GPS SIKANDAR SHUMALI	CHEHKAN	
∵. 		SHAHZADA MUHIB ULLAH	MUHAMMAD ASLAM	12101- 3837795-9	92.31	GPS SIWAC .	CHEHKAN	
1.	7 (7)(7)(1)	MUHAMMAD ALTAF KHAN	UMAR HAYAT KHAN	12101- 7309163-5	98.29	GPS TAI NA	CHEHKAN	

Page 1 of 32



S.Ņo	Rolf No	NAME .	FATHER'S NAME	CŃIC	SCORE	PLACE OF POSTING	COUNCIL
618.	1760] 1	OBAID ULLAH	KHALIL UR RAHMAN	1210J- 0899685-3	124.87	GPS NO.3 PAROA	PAROA
619.	.1762676	MUĤAMMAD KHALID	SAIF ULLAH	1210J- 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
621.1	. 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. NOTA/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, the 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

Attisted

M. A miniat: Amark

purcease supreme count

DIKHIM

Appointment Orches DST Asias Saline, DIKlum

- 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.

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. 4. The SDEOs (Male) DIKhan/Paharpur/Paroa/Kulachi.
- 5. The Candidates Concerned,

Master File.

District Education 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 Teuchers (PSTs) are hereby regularized in BPS-12 with effect from the date of their initial appointment.

Sr	RollNo	Name	Total Marks Jout of	School	υc	Appointment order No and dated	Extension order No and dated if any	CNIC
i	1760002	MUAHMMAD SHAHID	93.5	GPS DARWESHA	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 6286930-3
2	1760477	BASHIR AHMAD	97.19	GPS GARA BALA	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 8038430-1
3	1760752	NAVEED AHMAD	109.58	GPS GARA HASSANI	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 2041550-9
4	1760368	MUHAMAMD RAMZAN	116,35	GPS GARA MORE	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 7034423-1
5	1760733	RAHMAT ULLAH	95.33	GPS 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	Chelikan	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	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 3818810-5
8	1764200	RÁB NAWAZ	95.9	GPS NURANG UTRA	Chelikan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 7539649-3
9	1764043	ABDUL BASAT	116.49	GPS SHERO	Chenkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 3958240-7
10	1760108	SANA ULLAH	88.45	GPS SIKANDAR SHUMALI	Chchkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14	12101-
11	1760822	SHAHZADA MUHTB ULLAH	92.31	GPS SIWAG	Chehkan	No. 7135-7765 Dated 17-05-2014	Dated 02-06-2017 No. 15408-14	9636197-3 12101-
12	1760603	MUHAMMAD ALTAP KHAN	98.29	GPS TAJ	Chehkan	No. 7135-7765 Dated 17-05-2014	Dated 02-06-2017 No. 15408-14	3837795-9 12101-
13	1762586	MATI ULLAH	112.95	GPS BASTI DIRKHAN	DD# 1	No. 7135-7765 Dated 17-05-2014	Dated 02-06-2017 No. 15408-14	7309163-5 12101-
14	1763381	MUHAMMAD JAVED KHAN	98.86	GPS CHAH BAREY WALA	DD# I	No. 7135-7765	Dated 02-06-2017 No. 15408-14	8937011-7 12101-
15	1760005	MUHAMMAD YOUNIS	127.49	OPS KACHI PAIND KHAN	DD#2	Dated 17-05-2014 No. 7135-7765	Dated 02-06-2017 No. 15408-14	5971143-9 12101-
16	176303	MUHAMMAD WAQAR AHMAD	112.77	OPS NO. I THOYA FAZIL	DD#2	Dated-17-05-2014 No. 7135-7765	Dated 02-06-2017 No. 15408-14	3032309-7
17	1760365	MALIK UMAIR YASIN	107.28	GPS NO. I THOYA FAZIL	DD#2	Dated 17-05-2014 No. 7135-7765	Dated 02-06-2017 No. 15408-14	7810587-1 12101-
18	1760921	AFNAN KHAN	103.37	GPS NO. 1 THOYA FAZIL	DD#2	Dated 17-05-2014 No. 7135-7765	Dated 02-06-2017 No. 15408-14	4061211-7 12101-
19	1760280	AZMAT ULLAH	101.43	GPS NO. 2 THOYA FAZIL	DD#2	Dated 17-05-2014 No. 7135-7765	Dated 02-06-2017 No. 15408-14	0217588-7 12101-
20	1760338	SAMI ULLAH KHAN	91.13	GPS NO. 2	DD#2	Dated 17-05-2014 No. 7135-7765	Dated 02-06-2017 No. 15408-14	0953316-5
21	1760755·	MALIK MUHAMMAD	88.19	THOYA FAZIL GPS TAHIM		Dated 17-05-2014 No. 7135-7765	Dated 02-06-2017	7097201-5
		IRFAN MUHAMMAD	00,17	ABAD	DD#2	Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 8201696-9
22	1760835	FIASHIM: MUHAMMAD	102.24	GPS BASTI DHAFPAN WALI	Deewala	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-
23	1760648	ILYAS	107.04	GPS CHAH MALIK WALA	Deewala	No. 7135-7765 Dated 17-05-2014	No. 15408-14	0936562-1 12101-
24	1760028.	MUHAMMAD EHSAN	105.62	GPS CHAH MALIK WALA	Deewala	No. 7135-7765 Dated 17-05-2014	Dated 02-06-2017 No. 15408-14	7076340-5 12101-
25	1760808	ZUBAIR AHMAD	103.41	GPS MADNI TOWN	Deewala	No. 7135-7765	Dated 02-06-2017 No. 15408-14	0940626-9 12101-
		<u></u> t,				Dated 17-05-2014	Dated 02-06-2017	3119854-5

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Anwar Awan Advocate Supreme Court O.L.Khan

Atlested



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

<i>[</i> -	Sr	RollNo.	Name	Address	Fotal Marks out of 200	School	School UC order No and order No a		Extension order No and duted if any	CNIC
	\ .	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		[2]U - 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 Eakhtunkhwa 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 drawl 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.
- 10. 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.

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

Endst: No. 87/2-10760 /Estt (Primary)

Copy forwarded for information and necessary action to the: -

Dated DIKhan 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.
- 10. Teachers Concerned.
- 11. Master File,

STRICT EDUCATION OFFICER LE) DERA ISMAI KHAN



SPACEOUNTSPENA STRION OFFICERS MADE

The Director Elementary & Secondary Education, Khyber Pakhtuakhwa, Peshawar



Subject:

GUIDANCE REGARDING SENTOREY LIST OF PST

Respected Sir, __w

It is stated for your kind information that a letter bearing No. 148a2 chiled 18 on the subject cited above has been submitted to your good office but no guidance in provided. this regard till yet.

It is requested that seniority list of PST (NTS) is under procession appearing in necessary guidance is required on the following paints.

Whether the seniority listic updated according to merit score of the teachers or from the date of talking over charge and then on age.

2. In the year 2014 that appointments of PST (NTS) were made in two phases i.e on way 2014 & December 2014. Whether these phases may be merged together and their determine their Senicority on cotherwise.

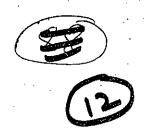
(MALE) DERAISMAES ROOM

Endsr: No. 1/7.29-33/

Dated: 04 / 66 /2020

Copy for information to the:-

- PA to Director Elementary & Secondary Education Khyborst aktimathy
- Deputy District Education Officer (Male) DICham
- 3. All the SDEO's (Male) in District Dera Ismail Khan:
- PA to DEO (Male) DIKhan.







DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR.

No. 6416 IF. No. Appeal D. I. Khan. Dated Peshawar the 1/2020.

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 O APT Rules 1989 and the KP Employees (Regularization of Service) Act 2018

> sistant Director (Estab :) Elementary & Secondary Edu: Kliyber Pakhtunkhwa Peshawar.

Copy forwarded to the:- 1

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

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

Piter & Or Annan Awan



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)

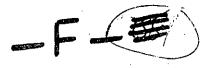
. ne committee after consultation with the respective ASDEOs of all the 11 circles and SDEOs of five tehsils of District D.I.Khan, compiled the seniority list. The committee gave ample time for correction and modification of the list.

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 CNIC	NAME	FATHER NAME	DOMICILE	PRESENT PLACE OF POSTING	DATE OF BIRTH	DATE OF TAKING CHARGE	SCORE	TEHSIL	METHOD OF APPOINTMENT	REMARKS
12101- 2 3104636-5	SHAH JAHAN	GUL DAD	DIK	GMPS JALAL BORING	17 Mar 1961	01 Feb 1979		DIKHAN	DIRECT APPOINTMENT	
12101- 8000082-7	AZIZ ULLAH	SAAD ULLAH	DIK	GPS DIN PUR	20 May 1961	26 May 1982		DIKHAN	DIRECT APPOINTMENT	
12103- 200-1490966-3	AMHA QATHZUM	RAB NAWAZ	DIK	GPS MITHA PUR KALAN	10 Apr 1962	16 Dec 1982	!	PAHARPUR	DIRECT APPOINTMENT	
िह्न देश श्री 2103- स्टेंडिंग के 1482132-1	ALLAH NAWAZ	MUHAMMAD NAWAZ	S. 81-54	GPS KALA GORH	10 Sep 1962	17 Nov 1983		PAHARPUR	DIRECT APPOINTMENT	
12013- 3841194-3	GHANI-UR-REHMAN	SHER DIL	DIK	GPS NO.1 PAHARPUR	01 Nov 1962	20 Dec 1983	-	PAHARPUR	DIRECT APPOINTMENT	• • •
12101- 6 0961741-7	ASEEM KHAN	AZAM KHAN	DIK	GPS GILOTI	01 May 1963	19 May 1984	-· •	DIKHAN	DIRECT APPOINTMENT	
12101- 0965650-3	MUHAMMAD RASHID	GHULAM JEELANI	DIK	GPS KOKAR GHARBI	10 Sep 1961	.05 Sep 1984		DIKHAN	DIRECT APPOINTMENT	 !
2150050-7	ABDUL SAMAD KHAN	ABDUL GHAFAR	DIK	GPS BASTI BALOCHAN	28 Apr 1961	17 Oct 1984	1	DARABAN KALAN	DIRECT APPOINTMENT	
9 12101- 0939011-5	ABDUL RASHID	IMAM BAKHSH	DIK	="	15 Oct 1963	17 Oct 1984	·	PAROVA	DIRECT APPOINTMENT	
12103-	MUHAMMAD ABBAS	ABDUL HUSSAIN SHAU	DIK	GPS SAID ALLVAN	15 Apr 1965	17 Oct 1984		PAHAPDIID	DIRECT APPOINTMENT	

642 12102- 6756844	MUHAMMAD INAM .	MUHAMMAD RAMZAN	DIK.	GPS NO.2 HAROON ABAD	01 Jun 1987	17 May 2014	96.49	KULACHI	NTS	1 ,			•
643 1770482		ABDUL MANAN	DIK	GPS NO. 3 CHAUDHWAN	03 Dec 1989	17 May 2014	96.40	DARABAN KALAN	NTS	!		4	
644 12104- 6577141	FAHIM ULLAH KHAN	REHMAT ULLAH KHAN	DIK	GPS KOT MUSA	24 May 1990	17 May 2014	96.31	DARABAN KALAN	NTS	-6	\	1	
645 3948242		FAUIDAR KHAN	6 1116-13	GPS NO 2 MANDHRA KALAN	23 Mar 1978	05 Dec 2014	96.26	DIKHAN	NTS	د	2	Count	
646 1981736	[GHULAM SIQQIQUE	DIK	GPS BAIT METLA	16 Apr 1988	17 May 2014	96.23	PAROVA	NTS		豆	753 753	·
647 1 *13 (2349450	I MUHAMMAD IQBAL	KHAWAJA UMER	-DIK,	GPS WANDHA DHOOR	10 Feb 1982	17 May 2014	96.11	PAHARPUR	NTS			npreme	
648 12102- 3289124	3 HIKMAT ULLAH KHAN	HAMID ULLAH	DIK	GPS MOH: KAMAL KHEL	29 Mar 1989	17 May 2014	96.07	KULACHI	NTS		2	18 90 18 90	
3/2 12101-		SIBGHATULLAH	DIK	GPS HANIF TOWN	01 Apr 1985	17 May 2014	96.06	DIKHAN	NTS		5.	Advocate S D.I.Kiran	
3181280- 650 # 2145364	ZAHOÓR AHMAD	ALAMGIR -	DIK	GPS NO. 1 MANGAL	08 Mar 1988	17 May 2014	96.06	DARABAN KALAN	NTS -		······	O.	
651 12103- 1501951-	<u> </u>	HAFIZ ASHIQ HUSSAIN	DIK	GPS NAJM UL HUDA	10 Oct 1980	17 May 2014	96.04	PAHARPUR	NTS				
652 0262561	SUHAIL AHMAD SHAH 9 GILLANI	MUHAMMAD NAWAZ SHAH	DIK	GPS NO 2 SHORE KOT	23 May 1984	17 May 2014	95.95	DIKHAN	NTS			1 !	•
653 12101- 7539649-	1	GUL SHER	DIK	GPS NORANG UTRA	04 Mar 1981	17 May 2014	95.90	DIKHAN	NTS	-		' i 	
654 2 12103	AZMATKHAN	AJAB KHAN	DIK	GPS KOT MASOODAN	12 Apr 1981	17 May 2014	95.83	PAHARPUR	NTS			<u>}</u>	
1497257- 12101- 655 1742307- 1742307-	SHAH NAWAZ	HAQNAWAZ	DIK	GPS RAMAK NO 1	02 Jan 1989	17 May 2014	95.79	PAROVA	NTS			1	
6624627-	MUBASHAR HASSAN S RAZA	GHLAM HAIDAR		GPS MEHMOOD ABAD	03 Dec 1989	17 May 2014	95.77	PAHARPUR	NTS			1	
12101- 3 657 - 9734051-	GUL RAUF	ABDUR RAHEEM	DIK	GPS NO 1 PUSHA	10 Mar 1991	17 May 2014	95.65	DIKHAN	NTS			'. ! 1	
658 12103- 6663597-	MITHAMMADIMPAN	MUHAMMAD JAN	DIK	GPS KOKAR GHARBI	05 Feb 1984	17 May 2014	95.60	DIKHAN	NTS	İ		- !	
659 12103- 3355824-	GHULAM SIDDIQUE	GHULAM RASOOL	DIK.	GPS YARI KHEL	01 Jan 1987	17 May 2014	95.57	PAHARPUR	NTS			,	
660 12101- 0981527-	ABU NASAR MUHAMMAD 3 PARSA	AHMAD SAEED	DIK	GPS BASTI DIRKHAN	07 Jan 1981	17 May 2014	95.56	DIKHAN	NTS	-			
661 12101- 4420108- 12101-	:	GULZAR HUSSAIN		GPS DIWAN SAHIB	05 Aug 1992	05 Dec 2014	95.49	DIKHAN	NTS			!	
5719694-	· • • •	ILLAH BAKHSH		GPS WANDA BALOCHAN CRBC	05 May 1988	05 Dec 2014	95.46	DIKHAN	NTS				
663 12101- 5709320-	RAHMAT ULLAH	SARFARAZ	•	GPS CHEHKAN	10 Mar 1987	17 May 2014	95.33	DIKHAN	NTS				
664 1652195-	HAJI MUHAMMAD 1 SALEEM _	KHAN MUHAMMAD	DIK. (GPS RORA	13 Feb 1990	05 Dec 2014	95.27	PAROVA	NTS	•			
										=			• •



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

dos of BET (aps 13) to appet (aps 14)

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

Respected Sir,

officer D. I. KHAN advertised for the

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 abovementioned 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 as amanency 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 sonceroed:

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 10/03/2013, 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").

Athir Angelling

- 16-

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

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

attistial

M. Anwar Awar

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

Attested Aware

PS.L. DISH . WITE " LIST "\$ 0345.7373705 17,8 Sal (995 PST While) (1 11/1 ع امراد صین PST ، PST سعرکس را 0346. 7878562 16/14 GPS PST illical (3 ه معدالطب PST معاند مان ماند مان ماند 1315.9839 و 1315 5) عبدالنمار 1980 PST واقع معلال 19808 PST عبدالنمار 5 6) مراليوم PSF وي مرارك - دوم ماليون 03422653616 - CAPS PST 13 0M (7 · My GAS PST UIL THIE (8 03459849865 0344 859 6979 . Jely CAPS PET west 19 الكراد داري الله الله الله المالي المركة والرا ال المراد المرا (قال المراس)، قولون ساركات ، بمالزور الله عبرت و في الله والحك و ورين عبل المهالله ا محدة مسف بن أبن ملعل مر ما لي رسوفان جي آي آلين فؤرنگ انتراء ورد المحمداني (PS7) عوري حاديد المر 145245 (PS7). 9 0 جي اجمير Alonate 0343-2196815 - 1/0 080 - 1 Sur E M (B) = 03458834132 . West & !! Blat ostors with UNO Pino H. ى محديالل. يُ محدا فسال June 0315-9467336. UEUL (1) 0345-9872124 2 1020 لا عايدس PST 2501: EG المالي المحربه والمراد المعالم 11 وقع اخترمنیر ۲۵۲ // المراجي رافي والم PST 23 6 26 // 11 Flippie (27 المالي مول بروز 28 فرامحر المالي في المالية المالية الم جي لي السي مكواني سترابي .. ر*ه شارشه ۱۱* الآ- امان الكر جی تو ایس مبرکیر AL JU 32

Manan Supreme Cont.

MAR ASSOCIA PARIS' Sanaullah/Shamim Gandapur لمقدمه مندريه بالاعتوان بين الجي طرف والسطريروي وجوابدي برائي يثني بالصفه مقدمه بمقام كو مسيد في المرافظ برونيل مركيا بيم كيش بريش برخود بالمر دايد تفتيارخاس دو بروه والمت حاضر و وتام والي أور مروقت والد سوسوف کواطلار کاد مکرمانسر عدالت کرول گاه اگریشی برمظهر حاضرت وار اور مقدمد میر را غیر حاضری کی وجد سے کی افود برمیر سر: خلاف او کیا۔ توصاحب موسوف ذريداد شدول كريد تيزوكل صاحب موسوف مدورتام كيمرى كما وه كى تبكه والمجمري كراوقات من مبله ما يجيم ياروز عليل ويروى كرف كودرداد شد ور ك اور عد مدر كبرى كعلاده اوجكها حت ور فيارونه المرى إلى كاوقات كاك تنفي في وفي برمنظ ركوكي انتسان بين واس كذور وار یا آن کے واسطے کی معاوت کے اوا کرنے یا مختاندوا ہی کرنے کے میں مون فرمدوار شدہ وں کے مجھ کو کل ساخت واخت ساحب موسوف می کردو وان أول الكورد أول الاكاساور صاحب موسوف كومن وجوى ما جواب وجواست التراسة والركاونال والمرافي وجرم والمواست بروسخا والصديق كري والا النا المعالى الركي تم يا وكرى كماف الديرتم كارديبيدا ول كرف الدرسيدسية الدواعل كرف الديرتم كم مان دسية الأكري كمان عامد وأصله ا مان كرية ما قالي ووي كالمحى احتيارا وكار اوراسورت مقرر مون تاراع في مقدمد فدكره برون الريحم كصدر بيروى مقدمد و ورمافل والحل وكرا مل ويرآمدك وقده باستسرة بالركا يجرف بادوخاست عمامتاى باترتى باكرفاري أراز فيسلناجرائ فكري ساجب مصوف كويشرطادا بكي عليمده علانسيروى كالعشاريس و يرساحب موسوف مثل كرده ذات خود منظور وقيل وقال اوراهمورت مرورت مساحب موسوف كوية كل اختيان وكاكر مقدمه لمركوره بالسنك كويات ك كارواني إلا ورنت ورخواست أظر فافي التي بالكراني إد مكر موالم مقدمة وراكل ودرسه وكل بايير مثر كوابيع بمواسعي السينة بعمرا مقرر كرس ما وداري التوثير قالول ألا المريال واي اورويد القيادات عاصل مول ميره جيد ماحد موسوف كومامل إلى ، اور دوران مقدمه على جويك برجاند الوام يريكا ، وه صاحب مرسون کات موکل اگر مساحب موسوف کو بوری لیس تاری بیش سے پہلے اواف کروں گا۔ تو مساحب موسوف کو پوراافقیار موکا کرور متند سک میروی نہ کریں اوراکی صيرت بان مراكون مطالبكي مكاماعب موسوف كرر ظاف الرادة الأا لرد اورالت تاميكهد ياسيمستاك سندسي مفهون وكالسن ناميس ابرا ب- اوراجي المرح مجدليات اورمفاور ب-

Amar adv

M. Anwar Awan Advocate Supreme Court D.Lithan Balawa?

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

SERVICE APPEAL No. 7509/21

Syed Sohail Ahmad Shah Gillani & 33

Government of KPK

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District Education Officer (Male) Dera Ismail Khan

S.A. no: 7537.
Rabalawaz

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	$\mathbf{v}\mathbf{s}$	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	Gov 'nment of KPK
27. Rehmat Ullah	VS	Government of KPK
28. Abdul Ghafoor	VS	Government of KPK
29. Haji Ahmad	VS	Government of KPK
30. Imdåd 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 doctorine of 1 ches.
- 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.

(6/6/2022

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

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

1. Para pertains to the appointment of appellants on 17-05-2014 and respondents appointments on 05-12-2014.

Factual objections

- 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



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 Scheel along with 33 being Same m-Kamran Khan and indentical nature of 8 2022 Morst bo wells any correction attachment of among tures and affectivit solly alleged.



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. 2048 9- 96 /ADEO(Estab; Pry) Dated D.I.Khan the: 14 / 10 /2020.

- 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 Leucation Officer (Male) Dera Ismail Khan

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

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

The committee consists of following members.

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

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

3. Mr. Muhammad Danish Roman Khan SST-IT, GHS No.5 D.I.Khan (Member)

The committee after consultation with the respective ASDEOs of all the T1 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		PRESENT PLACE OF POSTING	DATE OF BIRTH	DATE OF TAKING CHARGE	SCORE	TEHSIL	METHOD OF APPOINTMENT	REMARKS
Post.		12101- 8104636-5	SHAH JAHAN	GUL DAD	DIK	GMPS JALAL BORING	17 Mar 1961	01 Feb 1979	f Ì	DIKHAN	DIRECT APPOINTMENT	
Dew		12101- 8000082-7	AZIZ ULLAH	SAAD ULLAH		GPS DIN PUR	20 May 1961	26 May 1982		DIKHAN	DIRECT APPOINTMENT	
درد درد		312102	MUSHTAQ AHMAD	RAB NAWAZ	DIK	GPS MITHA PUR KALAN	10 Apr 1962	16 Dec 1982	ļ 	PAHARPUR	DIRECT APPOINTMENT	
536		12103- 1482132-1	ALLAH NAWAZ	MUHAMMAD NAWAZ	DIK	GPS KALA GORH	10 Sep 1962	17 Nov 1983		PAHARPUR	DIRECT APPOINTMENT	
FA:	8-2-5-	12013- 3841194-3	GHANI-UR-REHMAN	SHER DIL	'DIK	GPS NO.1 PAHARPUR	01 Nov 1962	20 Dec 1983	; ;	PAHARPUR	DIRECT APPOINTMENT	
: · 55¢		12101- 0961741-7	ASEEM KHAN	AZAM KHAN	DIK	GPS GILOTI	01 May 1963	19 May 1984		DIKHAN	DIRECT APPOINTMENT	
, See		\$12101- 0965650-3	MUHAMMAD RASHID	GHULAM JEELANI	DIK	GPS KOKAR GHARBI	10 Sep 1961	:05 Sep 1984		DIKHAN	DIRECT APPOINTMENT	
Pen		§ 12102- © 2150050-7	ABDUL SAMAD KHAN	ABDUL GHAFAR	DIK	GPS BASTI BALOCHAN	28 Apr 1961	17 Oct 1984	<u> </u>	DARABAN KALAN	DIRECT APPOINTMENT	
55°	1, 1	12101- 20939011-5	ABDUL RASHID	IMAM BAKHSH	DIK	GMPS HAZARA PAKKA	15 Oct 1963	17 Oct 1984		PAROVA	DIRECT APPOINTMENT	
		12103-	MUHAMMAD ABBAS	ABBUL HUSSAIN SHAH		1.3	15 Apr 1965	17 Oct 1984	<u> </u>	PAHARPUR	DIRECT APPOINTMENT	

				12.0				395020	the state of the s	NTS	and the second s
206	12101- 0978280-3	SAADULLAH KHAN	HABIB ULLAH KHAN		GPS NO. 9 DIKHAN	10 Jan 1976	05 Dec 2014	130,48	DIKHAN	NIS .	<u> </u>
4207	12102- 2620619-1	ABRAR AHMAD	NISAR AHMAD •		GPS NO. 4 DARABAN KALAN	01 Apr 1983	17 May 2014	129.42	DARABAN KALAN	NTS	
re da v	312102- 3786840-3	SHAFQAT ULLAH KHAN	BARKATULLAH KHAN		GPS HATHALA	04 Aug 1985	17 May 2014	129.22	KULACHI	NTS	
¥209	12103- 3730498-5	LIAQAT HUSSAIN KHAN	KHADIM HUSSAIN KHAN	юјк	GPS BAND KURAI	14 Aug 1981	17 May 2014	129.02	PAHARPUR	NTS	
210	12101- 6238687-7	IRSHAD ULLAH	MUHAMMAD IQBAL .	DIK	GPS NO 1GILOTI	11 Dec 1987	17 May 2014	128,85	DIKHAN	NTS	
F 1211 7	12101- 4778025-1	MUHAMMAD FAHEEM	SALIM NAWAZ	DIK,	GPS BEHARI COLONY	14 Jan 1988	17 May 2014	128.69	DIKHAN	NTS	
62 22	12101-	NAQEEB ULLAH	ABDUL LATIF	DIK.	GPS WANDA HAIBATTI	15 Mar 1984	17 May 2014	128.47	DIKHAN	NTS	
12 137 12 137	12103- 5. 6465101-9	MUHAMMAD BILAL	ABDUR REHMAN	рік	GPS NO.2 PAHARPUR	06 Jan 1986	17 May 2014	128.28	PAHARPUR	NTS	
214	12102- 8779268-1	HIZBULLAH KHAN	MUHAMMAD ABBAS KHAN	bik	GPS NO.1 TAKWARA	20 Apr 1987	05 Dec 2014	128.25	KULACHI	NTS	
\$ 621 <u>50</u>	12103- 7927358-5	MUHAMMAD IRFAN	BASHIR AHMAD .	DIK.	GPS RANG PUR SHUMALI	09 Dec 1984	17 May 2014	127.91	PAHARPUR	NTS	
M216	12103- 5196931-7	MUHIB HUSSAIN SHAH	SYED RIAZ HUSSAIN SHAH	DIK	GPS NO. 2 DHALLAH	24 Apr 1981	05 Dec 2014	127.84	PAHARPUR	NTS	
227	12103- 5436677-1	MUHAMMAD SHOAIB KHAN	IBRAHIM KHAN	dik	GPS WANDA NARKANI	04 Feb 1993	17 May 2014	127.73	PAHARPUR	NTS	
60 TR	11201- 6609430-1	ASSAD HUSSAIN SHAH	MASROOR HUSSAIN SHAH	tilk	GPS WANDA TALGI	19 Sep 1989	05 Dec 2014	127:55	PAHARPUR	NTS	
1,20	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	wik	GPS KOT MASOODAN	02 Jan 1977	05 Dec 2014	126.77	PAHARPUR	NTS	
322	12101- 3144698-1	ISRAR MUHAMMAD	MUHAMMAD BAKHSH	ijis:	GPS JHOKE GUMLA	16 Mar 1985	17 May 2014	126.62	PAROVA	NTS	
221:	12103- 1502464-7	QAZI MUHAMMAD ABDUL WAHAB	QAZI KHIZAR HAYAT	шĸ	GPS HAFIZ ABAD	25 Feb 1986	17 May 2014	126.23	PAHARPUR	NTS	
223	12105- 34017-3	RIAZ ALI KHAN	NIAZ ALI KHAN	Dik.	GPS RAMAK NO 1	15 Sep 1990	17 May 2014	125.50	PAROVA	NTS	
224	12101- 22071864-1	SHOAIB UR REHMAN	GHULAM SUBHANI	DIK	GPS GARA RASHEED	03 Dec 1985	17 May 2014	125.38	PAROVA	NTS	
14 225 P	12101- 8953208-5	MUHAMMAD ZUBAIR	MUHAMMAD JAVEED	ЫK	GPS BALOCH NAGAR	20 Dec 1985	17 May 2014	124.54	DIKHAN	NTS	
2263	12101- 25048995-5	HIDAYAT ULLAH	MUHAMMAD AFZAL	DIK	GPS BUCHRI •	03 Jul 1987	17 May 2014	124.50	PAROVA	NTS	
227	12103- 6391600-7	MUHAMMAD TARIQ	ABDUL QAYYUM	DK.	GPS ASIF ABAD	03 Sep 1988	17 May 2014	124.29	PAHARPUR	NTS	
228	12102- 2136771-9	IMRAN ULLAH	ABDUL WAHAB		GPS BEHLOL KHEL	10 Feb 1980	17 May 2014	123.87	KULACHI	NTS	
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2 (12103- 3 (275) 2 3750799-1	NAZIR AHMAD KHAN	MUHAMMAD KHAN	EDIK GPS HASSANI	KHEL 10 Mar 1988	17 May 2014	123.85	PAHARPUR	итѕ	
12101- 101- 18111998-7	MUHAMMAD ZAFFAR	ALLAH BAKHSH	DIOL GPS MANDHE	KĄ SAIDAN 07 May 1976	05 Dec 2014	123.69	DIKHAN	NTS	
12103-	MUHAMMAD IMRAN	SHER MUHAMMAD	GPS RAJAN P	UR 10 Mar 1991	17 May 2014	123.55	PAHARPUR	NTS	
12101- 2 0991881-9	MUHAMMAD (BRAHIM	MOLVI IMAM BAKHSH	ADIK OGPS JATTA	02 Jul 1984	17 May 2014	123.29	PAROVA	NTS	
12103- 233 0447973-9	MUHAMMAD QAYYUM	ROZI KHAN	DIKA GPS TOBA	25 Apr 1983	17 May 2014	122.17	PAHARPUR	NTS	i
12103-	MUHAMMAD IRFAN	MUHAMMAD RAMZAN	DIK GPS NO.2 PAF	IARPUR 14 May 1986	17 May 2014	122.07	PAHARPUR	STN	
12103- 5710032-5	SARDAR KHAN	ABDUL SATTAR KHAN	DIK GPS KHOKHA	R 03 Jul 1981	17 May 2014	122.05	PAHARPUR	NTS	
12101- 9375468-1	FAZAL UR RAHIM	ABDUR RAHEEM	DIK GPS NO 2 GIL	OTI 15 Mar 1985	17 May 2014	121.91	DIKHAN	NTS	
12101-	SYED ZAIGHAM ABBAS	GHULAM RASOOL	GPS KACHA N DIE NOI	1ALLANA 02 Aug 1986	17 May 2014	121.90	PAROVA	NTS	
12104- 12104- 12103 6105338-3	SAMI ULLAH	HIDAYAT ULLAH	DIK GPS NO. 1 MU	SAZAI 21 Apr 1992	17 May 2014	121.49	DARABAN KALAN	NTS	i
9631824-1	MUHAMMAD ZULQARNAIN HAIDER	SAIF UR REHMAN	GPS.NO 6 DIK	HAN 01 Apr 1988	05 Dec 2014	121.45	DIKHAN	NTS	
12104- 0478550-3	AMIR HAMZA	MAQBOOL AHMAD	GPS KHIARA MUHAMMAD	117 May 1987	17 May 2014	121.39	DARABAN KALAN	NTS	
12101-	MUHAMMAD ARSHAD	MUHAMMAD JAAN	DIK GPS KURAI	03 Feb 1989	17 May 2014	121.37	DIKHAN	NTS	
7 5 12101- 4770275-3	MUHAMMAD SHAFIQ	ABDUL LATIF	GPS TEEKIN	02 Jan 1988	17 May 2014	121.17	DIKHAN	NTS	
12103- 1213-18409583-7	HAFEEZ ULLAH	GHULAM YASIN	GPS CHAH ME	JNDHR 10 Sep 1984	17 May 2014	119.97	PAHARPUR	NTS	
12103- 8705620-7	MOHAMMAD ARIF	ABDUL ALEEM	OK GPS KURRAR	02 Feb 1980	17 May 2014	119.96	PAHARPUR	NTS	
12101- 5983191-5	MUHAMMAD IQBAL	BASHEER AHMAD	DIK GPS JHOKE J	IEDA 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	Alleria delle Milli sprime di Miler lyn impère d
12103- 2247-86-5734305-9	JAVED KHAN	SONA KHAN	DIK: GPS BILOT SH	ARIF 06 Sep 1985	17 May 2014	119.89	PAHARPUR	NTS	, •
12101- 1764785-7	MUHAMMAD SHOAIB	FAIZ MUHAMMAD	DIK GPS MOGA	10 Jan 1988	17 May 2014	119.75	DARABAN KALAN	NTS	
7249 12101- 77534975-9	AURANGZEB	MUHAMMAD SHAFI	DIK - GPS BEHARI (OLONY 12 Sep 1985	17 May 2014	119.54	DIKHAN	NTS	
12101- 250 5594929-7	MUHAMMAD SHAKEEL	KHALIL AHMAD	DIK GPS SULTANI	;	17 May 2014	119.47	DIKHAN	NTS	
251 251 2596828-3	MUHAMMAD JAMSHED	AMIR MUHAMMAD	GPS NO. 1 KIR SHAMOZAI	18 Jan 1988	17 May 2014	119.38	DARABAN KALAN	NTS	
<u>Marie Tabi Zilale nga mang nagar</u> an	<u>a</u>	D.		8			,		

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	12101- 6127838-1	MUHAMMAD MATI ULLAH	AHMAD SAEED		GPS BEHARI COLONY	20 Feb 1984	17 May 2014	119.27	DIKHAN	NTS	
	12102- 8432598-3	HAFIZ UR REHMAN	FAZAL REHMAN		GPS NO.3 MADDI	07 Apr 1989	17 May 2014	119.23	KULACHI	NTS	
	12103- 5723200-1	ABDUL GHAFFAR	MUHAMMAD HUSSAIN	1916	GPS CHAH LADHA	13 Mar 1986	17 May 2014	119.10	PAHARPUR	NTS	
	12102- 4897404-1	MUHAMMAD IMRAN	SONA KHAN		GPS NO.2 KULACHI	02 Jul 1985	17 May 2014	119.03	KULACHI	NTS	
1 3 3 3 3 3 3 3 3 3 3	12102- 1414606-5	naeem shah	HAKEEM SHAH	ir sy Dire	GPS NO. 4 DARABAN KALAN	15 Dec 1982	17 May 2014	118.86	DARABAN KALAN	NTS	
201	12103- 8642875-1	MUHAMMAD RIAZ UR REHMAN	SAHIB JAN	ÐК	GPS WANDHA YARIK	09 Nov 1988	17 May 2014	118.83	PAHARPUR	NTS	
	12103- 0254015-9	GHULAM SAMDANI	RAZA MUHAMMAD	30.7	GPS MADI KHEL	17 Aug 1986	17 May 2014	118.62	PAHARPUR	NTS	
20-17	12102- 4302096-3	MUHAMMAD RIAZ	HUSSAIN BAKHSH	Sinc	GMPS G.RABNAWAZ	19 Feb 1984	17 May 2014	118.57	KULACHI	NTS	
380	12103- 5462943-1	MUHAMMAD ALI	RAIS KHAN		GPS WANDA LALI	09 Jan 1985	17 May 2014	118.30	PAHARPUR	NTS	
	12103- 8486125-7	MUHAMMAD IRFAN ULLAH	GUL BADSHAH		GPS WANDA LALI	04 Jan 1991	17 May 2014	118.06	PAHARPUR	NTS	
	12103- 2043062-1	KAMRAN ALI	GHULAM HASSAN	igit.	GPS NO.1 PAHARPUR	03 Dec 1984	17 May 2014	117.75	PAHARPUR	NTS	
	12103- 8169823-5	MUHAMMAD ZEESHAN AHMAD	AHMAD NAWAZ	11.5	GPS NO.1 PAHARPUR	20 Apr 1987	17 May 2014	117.63	PAHARPUR	NTS	
	312101- 3036696-5	RIZWAN ULLAH	SHOUKAT ULLAH		GPS NO.1 ABDUL KHEL	03 Jan 1990	17 May 2014	117.53	PAHARPUR	NTS	
	12104- 8852999-9	MUHAMMAD KAMRAN	MULAZIM HUSSAIN	jok.	GPS MOCHIWAL	03 Mar 1986	17 May 2014	117.24	DARABAN KALAN	NTS	
266	12102- 1611179-5	ZAKAULLAH KHAN	ATTA ULLAH KHAN	ink.	GPS NO. 1 KOT SHAHNAWAZ	30 Apr 1985	17 May 2014		DARABAN KALAN	NTS	
	12101- 7896018-1	HAJI DILAWAR KḤAN	HAJI MIRZA KHAN		GPS KHUTTI	24 Apr 1989	17 May 2014		DIKHAN	NTS	
426874	ទ្ធី12102- នី5672976-7	HAIBAT KHAN	MUHAMMAD AMEER KHAN	ЮK	GPS NO.1 KULACHI	11 Feb 1982	17 May 2014	116.83	KULACHI	NTS	
2269 me	12103- 0244340-7	MUHAMMAD JABBAR	GHULAM RASOOL	eDik.	GPS KACHA MALI KHEL	30 Oct 1988	17 May 2014	116.82	PAHARPUR	NTS	
*4270 ·	12103- 4018813-1	GUL NAWAZ	MUSA KHAN	ppik:	GPS NO.1 ABDUL KHEL	15 Mar 1984	17 May 2014	116.81	PAHARPUR	NTS	
Majori	12102- 2134578-7	TAHIR KHAYYAM	TAUS KHAN	ЮΙΚ	GPS NO.1 KULACHI	16 Feb 1983	17 May 2014	116,75	KULACHI	NTS	
272 272	12101- 3958240-7	ABDUL BASAT	MAULVI GHULAM HASSAN	DIK	GPS KOT ESSA KHAN	02 Jan 1992	17 May 2014	116.49	DIKHAN	NTS	
27.	12101- 0924424-5	MUSHTAQ AHMAD	JUMMA KHAN	DIK	GPS KHANA SHARIF	02 Jan 1980	17 May 2014	116.40	PAROVA	NTS	
4 274 i.	12101- 7034423-1	MUHAMAMD RAMZAN	SHER ZAMAN	DIK	GPS GARA MORE	05 Mar 1981	17 May 2014	116.35	DIKHAN	NTS	
Market Street		<u> </u>		نون د کان برستانین ر	97)	_					·

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	12103-	MUHAMMAD ZUBAIR	ABDUL SATTAR KHAN	DIS		03 Fcb 1986	17 May 2014		Carrier of the	The state of the s	
	12103-	KHAN			97	 	 	.116.33	PAHARPUR	NTS	·
1	8271339-1	MUHAMMAD YOUNAS	GANMON		GPS NO I UMRAY WALI	03 Mar 1987	17 May 2014	116.25	PAHARPUR	NTS · ·	
	12103- 1416-6940574-7	TAHIR KHAN	HAJI NADIR KHAN	DIK	GPS NO.1 PAHARPUR	25 Mar 1992	17 May 2014	116.13.	PAHARPUR	NTS	
	\$12101- 278 25583256-9	SANA ULLAH	MUHAMMAD HANIF	DIK	GPS JK/ QURESHIAN	23 Mar 1987	17 May 2014	115.87	DIKHAN	NTS	
	12101- 18289665-1	ASIF ULLAH	GHULAM JAN	solk.	GPS WANDA HAIBATTI	04 Feb 1988	17 May 2014	115.70	DIKHAN	NTS	
	12101- 280 4 3 0924552-5	ALLAH BAKHSH	SARDAR BAKHSH	DIK	GPS JHOKE TARHELI NO.02	26 May 1983	17 May 2014	115.55	PAROVA	NTS	
HANT	12101- 7341749-1	MUHAMMAD YASEEN	MUHAMMAD AMIN	MV.	GPS NO.10 DIK	20 Sep 1972	17 May 2014	115.49	DIKHAN	NTS	
	32 12103- 282 3921303-3	SHOUKAT ULLAH	GHULAM MUHAMMAD	ĐΙΚ	GPS UDWAL	07 Apr 1990	17 May 2014	115.46	PAHARPUR	NTS	
1	283 - 12101- 283 - 6829025-5	NÁ VEED AHMED	ABDUL MAJID		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- 329927407-1	MUHAMMAD KHALID	ABDUL MAJEED		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- 288 - 9151950-7	MUHAMMAD ARIF	GHULAM HUSSAIN	A PAR	GPS BILOT SHARIF	20 Mar 1983	17 May 2014	114.89	PAHARPUR	NTS .	
	12103- 1779028-7	MUHAMMAD BILAL	RAB NAWAZ	ЮK	GPS TOBA	01 Apr 1992	17 May 2014	114.56	PAHARPUR	NTS	
	386 12101- 13224864-1	MUHAMMAD ZAFRAN	HIDAYAT ULLAH SHAKIR		GPS NO. 11 DIKHAN	15 May 1989	17 Мву 2014	114.52	DIKHAN	NTS	
	12101- 290 (6 0915691-1	MUHAMMAD BARAN	MAKHAN KHAN	, jik	GPS NO. 2 HAJI MORA	20 Mar 1979	05 Dec 2014	114.47	DIKHAN	NTS	
	12101- 12017 - 0409535-9	MUHAMMAD QAISER KHAN	SANWAL KHAN	-Dik	GPS DARABAN KHURD	01 Oct 1986	17 May 2014	114.42	PAROVA	NTS	
	12101- 7972 7672606-1	ASMAT ULLAH	KHUDA BAKHSH	DIK.	GPS KOTLA SAIDAN	17 Apr 1986	17 May 2014	114.40	DIKHAN	NTS	
The second	12101- 2033: 3228351-9	AZIZ ULLAH	ALLAH WASAYA	Dik	GPS HISSAM	30 Apr 1986	17 May 2014	114.25	DIKHAN	NTS	
	12101- 2042 12101- 23 2 0945908-3	MUHAMMAD BILAL	MALIK SOOBA	DIK	GPS RANGPUR JANUBI	12 Dec 1981	17 May 2014	114.20	PAROVA	NTS	
13-14	12103- 1502759-7	ASMAT ULLAH	MUHAMMAD KHAN	DIK	GPS NO. I DHALLAH	01 Jan 1978	25 Feb 2017	114.15	PAHARPUR	NTS	
	12102-	MUHAMMAD TARIQ	GHULAM MUSTAFA	DK	GPS NO.1 RORRI	05 Oct 1990	17 May 2014	114.06	KULACHI	NTS	
	296 4662592-1 297 12101- 二年次7191837-1	MOHAMMAD ATIF SHAHID	AMANULLAH	DIK	GPS KURAI	18 Apr 1983	05 Dec 2014	113.84	DIKHAN	NTS	

6 (5 12102- 11710 1010340-	DILAWAR SHAH	YAQUB SHAH	olk.	GPS FATEH ALI	27 Apr 1984	05 May 2017	108.57	DARABAN KALAN	NTS	
12101- 1472 4208009-	ZIA LIR REHMAN	JUMMA KHAN	, Dite	GPS HATHALA	26 May 1990	05 May 2017	107.37	KULACHI	NTS	
12105- 12105- 0352676-	SAMI ULLAH MALIK	QUDRAT ULLAH	Disc	GPS GARA AASHIQ	30 Apr 1993	05 May 2017	107.33	PAROVA	NTS	
7, 12103- 14743 - 2822984	MUHAMMAD TARIO KHAN	MUHAMMAD RIAZ		GPS HAJI KHEL	27 Feb 1991	05 May 2017	106.92	PAHARPUR	NTS	
11954 12102- 121954 15400765	ISHAH ZAIB KHAN	JALIL AHMAD KHAN'	DIK	GPS GARA BAKHSHA	03 Mar 1996	05 May 2017	106.40	DIKHAN	NTS	
12103-	KIFAYATULLAH KHAN	ABDULLAH JAN	pjk	GPS YARI KHEL	03 Feb 1987	05 May 2017	106.13	PAHARPUR	NTS .	
1242358 12102- 24 6 8289497	SIRALUD DIN	ZAHOOR US DIN		GPS GARA MOHABBAT	29 May 1992	27 Sep 2017	106.11	KULACHI	NTS	
12101-	ALLASGHAR	KARIM KHAN	DIK;	GPS WANDA HAIBATTI	01 Jan 1989	05 May 2017	105.68	DIKHAN	NTS	
28060378 12103-	MUIHAMMAD FAROOO	AALAM KHAN		GPS UMER KHEL	02 Mar 1992	27 Sep 2017	103.67	PAHARPUR	NTS	
2610033 12101-	SYED FARMAN ALI SHAH	SYED SHARAF HUSSAIN SHAH		GPS KOKAR GHARBI	03 Jan 1996	05 May 2017	102.23	DIKHAN	NTS	
3779757 12101-	MUHAMMAD WAQAR	RUSTAM KHAN	30 k	GPS KOKAR GHARBI	11 Dec 1996	05 May 2017	102.23	DIKHAN	NTS	
2538743 6 12101- 2782462	ABDUL RAUF	MUHAMMAD AZIM		GPS NO. 2 POTA	26 Nov 1991	05 May 2017	101.65	DIKHAN	NTS	
11183 12102- 16047043	MUHAMMAD RAFIO	ALLAH DAD		GPS KOT ATAL SHARIF	25 Dec 1990	05 May 2017	101.51	KULACHI	NTS	
12103- 4624642	KHALID AZIZ	AHMAD NAWAZ		GPS KACHI KATH GARH	02 Feb 1986	05 May 2017	100.96	PAHARPUR	NTS	
12101- 12101- 12101- 12101- 12101-	MUHAMMAD IKRAM	HAFIZ NAIMAT ULLAH		GPS JEEWAYA SAHI	15 Sep 1992	05 May 2017	100.18	DIKHAN	NTS	
12101- 186 0935010	MUHAMMAD JOBAL	MUHAMMAD KHAN	Ďķ.	GPS MIALI	10 Jun 1982	05 May 2017	100.05	PAROVA	NTS	
12101-	MUHAMMAD ZEESHAN	GHULAM BAKIR		GPS KOKAR SHARQI	11 Sep 1996	05 May 2017	97.95	DIKHAN	NTS	
12101-	FARID ULLAH	AZIZ ULLAH	STORY OF THE	GPS SHERU KOHNA	29 Dec 1992	05 May 2017	96.31	DIKHAN	NTS	
1690406 1189 12101- 343 00982330	KHALII AHMAD	GHULAM RASOOL	DIK.	GPS ZAFFAR ABAD	12 Dec 1981	05 May 2017	96.02	DIKHAN ·	NTS	
1190 13868	MUHAMMAD KHALID	MUHAMMAD AKBAR	DIK	GPS SHERU KOHNA	14 May 1990	05 May 2017	95.62	DIKHAN	NTS	
12101- 12101- 0755069	MINAMMAD TARIO BILAL	ABDUL WAHEED	,bik	GPS DARRABRI	11 Apr 1984	05 May 2017	95.35	DIKHAN	NTS	-
12104-	MUHAMMAD KHALII.	ABDUL RASHEED	DIK.	GPMS KOTHA DARKHAN	20 Aug 1989	05 May 2017	93.28	DARABAN KALAN	NTS	
12105-	SARIR SHAH	KHAIR SHAH	DIK	GPS POTA DADANZAI	06 Feb 1986	05 May 2017	93.02	DARABAN KALAN	NTS	
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Tell 4 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	12101- 8047233-5	RISHI HANS	HEERA LAL	DΙΚ	SAIDAN	12 Jul 1996	05 May 2017	90.48	DIKHAN	NTS	
HIGH IDSAGE	12101- 7464937-1	SHAFQAT ULLAH	MUHAMMAD AMEEN	DIK'	(13 Aug 1988	27 Sep 2017	90.37	DIKHAN	NTS	
15 106 25 - MILES N AT 23	12101- 0970848-7	SHANKAR	MANNA LAAL	DIK	GPS KHANA SHARIF	04 Oct 1973	09 Nov 2017	88:76	PAROVA	NTS	-
		SYED MUHAMMAD TAQI ZAIDI	SYED NASIR HUSSAIN ZAIDI	DIK	GPS AMIR SHAH	02 Feb 1977	22 Feb 2018		PAHARPUR	DECEASED SON / MEDICAL BOARD QUOTA	
198	12101- 7976492-5 12101-	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	100	GPS AHEER ABAD	01 Apr 1984	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
1300		ABDUR RASHID	ABDUR RAHIM	DIK.	GPS GOMAL KHURD	31 Jan 1985	22 Feb 2018	. ,	DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
	12101- 0808292-3	AFTAB MOHAY UD DIN	MOHAMMAD ASLAM	DΚ	GPS SHEIKH RAJU,	02 Apr 1985	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL , BOARD QUOTA	
	12101- 5595268-1	MUHAMMAD ALI NUMAIR	SYED JAHANGIR ABBAS	DK.	G.P.S WANDA BALOCH KOKAR	 21 Mar 1992	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	**************************************
	12102- 5739990-3	IRFANULLAH	FATEH ULLAH	OIK	GPS NO.2 KOT ESA KHAN	04 Oct 1993	22 Feb 2018		CHODWAN	DECEASED SON / MEDICAL BOARD QUOTA	
	12101- 5310377-9	ALI JAMSHED	JAMSHED AHMAD	ĎΚ	<u> G</u>	13 Feb 1994	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	

CHAIRMAN: MUHAMMAD SHAFIQ

MEMBER 1: ASIM SAEED

MEMBER 2: MUHAMMAD DANISH ROOMAN

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BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

SERVICE APPEAL No. 7509/21

Syed Sohail Ahmad Shah Gillani & 33 V

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

Marran Deponent

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

SERVICE APPEAL No. 7509/21

Syed Sohail Ahmad Shah Gillani & 33 VS

Government of KPK

Authority

1 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