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**0.0**1**.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

Appellar apposited
Security & Process Fee

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

*					<u>-</u>	
se No	•	752	L	72024		

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/10/2021	The appeal resubmitted today by Mr. Muhammad Anwar 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
		appellant/counsel for preliminary hearing to be put up there on
	<del>.</del> .	
		CHATRMAN
-		
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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.

No	/S.T,
DA	/2024
Dt	/2021

**REGISTRAR SERVICE TRIBUNAL KHYBER PAKHTUNKHWA** PESHAWAR.

Mr. Sana Ullah Shamim Adv. Supreme court at DI Khan

R/S,

2/s,
The objections are removed.

Januar

the appeal presented by Mr. Sana Ullah Shamim Gandapur Advocate today i.e. on 1907.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

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

No. 1343 /S.T.

REGISTRAR SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

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

Respected Sir,
The addresses of appellant and Respondents are
The addresses of appellant and Respondents are
in accordance with the Service Sules as
in accordance with the Service Sules as
mentioned in the Servicinity list. Copy of
mentioned in the Servicinity list. Copy of
mentioned in the Servicinity list. Copy of
mentioned in the Servicinity list. Open
deposed appeal is annexed. All ammentals
are retified and now legible plustocopies
are retified. One let of Second member is
plaged and attached. Vakalatnama is duly
plaged and attached. Vakalatnama is duly
attached. Certificate is attached with appea
attached. Certificate is attached
copies of Respondents are attached.
Objections Received un 27.87.2021.

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

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27

opposite party? On

port of KPK C Case Title: YES NO 1 This Appeal has been presented by: M. Anway Whether Counsel/Appellant/Respondent/Deponent have 2 the requisite documents? Whether appeal is within time? Whether the enactment under which the appeal is mentioned? Whether the enactment under which the appeal is filed is correct? Whether affidavit is appended? 6 Whether affidavit Ìs attested by competent Commissioner? Whether appeal/annexures are properly paged? 8 Whether certificate regarding filing any earlier appeal on the 9 subject, furnished? 10 Whether annexures are legible? 11 Whether annexures are attested? Whether copies of annexures are readable/clear? 12 Whether copy of appeal is delivered to AG/DAG? 13 Whether Power of Attorney of the Counsel engaged is attested 14 and signed by petitioner/appellant/respondents? 15 Whether numbers of referred cases given are correct? 16 Whether appeal contains cutting/overwriting?  $\mathcal{N}^{c}$ 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 Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has 25 been sent to respondents? On Whether copies of comments/reply/rejoinder submitted? On 26

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

Whether copies of comments/reply/rejoinder provided to

Name:

Signature: Dated: was Awan ASC

03/08/2021

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

Appeal no 1524 of 2021.

Rehmat Ullah

VS

Govt Of KP& Others

## **INDEX**

No.	Particulars Particulars	Annexure	Pages
1	Appéal		1-5.
2	Copy appointment order	A	6-9
3	Copy of Regularization Order	В	10-12
4	Copy of Office order Dated 04-06-2020.	C	13
5	Copy of orders dated 24-06-2020	D	14
6	Copy of Seniority List	E	15-16
.7	Copy of Departmental Appeal	F	17 - 20
8	Wakalat Nama	G	21.

Your humble Appellant

Rehmat Ullah Through Counsel

Mohammad Anwar Awan Advocate Supreme Court.

#### BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

	_	
/" A 1 BT		/2021
Service Appeal No		12021
Out vice rippout ite		,

RAHMAT ULLAH PST GPS CHAH DIYAL TEHSIL PAHARPUR,
DIST: DIKHAN. 5/0 Milhammad Ashraf 12/0 Bighwani Shumah
Tehsil Phaspus D. I. Khan
(Appellant): 44

#### **VERSUS**

Diary No. 730)
Dated 15/7/202

- 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.

Hungu

Filedto-day

M. A Try of And of Court

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

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

. 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

16. ABDUR RAUF KHAN GPS KOT MASOODAN 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 203-2021, 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.

Hundy

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

RAHMAT ULLAH

Through Counsels

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

KANEEZ BATOOL Advocate High Court D.I.Khan.

#### **AFFIDAVITE**

I, RAHMAT ULLAH PST GPS CHAH DIYAL TEHSIL PAHARPUR, DIST: DI KHAN. 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

12103-8300647-1

Identified by Counsel;

SANA ULLAH SHAMIM GANDAPUR

Advocate supreme Court of Pakistan D.I.Khan.

The Advisory of the Advisory o

# EFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal	No	/2	02	! 1

RAHMAT ULLAH VERSUS GOVT OF K.P.K etc

#### BOOKS REFERED;

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

# VERIFICATION/ Certificate

1, **RAHMAT ULLAH**, 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.

RAHMAT ULLAH



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

# 6

## 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:-

	1.					•	
S.No	No Roll No NAME			CNIC	SCORE:	PLACE OF POSTING	UNION
	·	Ţ <del>-</del>	DERA IS	MAJL KHA	N		COUNCI
	1760002	MUAHMMAD SHAHID:	QAYYUM NAWAZ	12101- 6286930-3	93.5	GPS DARWESHA	CHEHKAN
	1760177	BASHIRMHMAD	MUHAMMAD AFZAL	12 <u>101</u> - 8038430-1	97.19	GPS GARA BALA	CHEHKAN
	1760752	NAVEED ARMAD	NAZIR AHMD	12101- 2041550-9	109.58	GPS GARA	CHEHKAN
	<b>1760</b> 368	MUHAMMAID RAMZAN	SHER ZAMAN	12101- 7034423-1	U6.35	GPS GARA	CHEHKAN
	V760733	RAHMAT ULLAH	SARFARAZ	12101- 5709320-3	95.33	MÖRE GPS HAINDAN	CHEHRAN
<u> </u>	1760335		MUHAMMAD IQBAL	12101- 4536514-5	87.57	GPS JANDI	CHUHKAN
	1761263	MUHAŅĀAD ABBAS	MUHAMMAD RAMZAN	12101-	109.62	SINDH GPS JEVAYA	<u> </u>
	4760735	MUHAMMAD SALEEM	KARIM BAKHSH	12101 0972120-3	117.46	SAHI GPS NO. 2 POTA	CHEHKAN
	1762690	MUHAMMAD NADEFALAKITAR	MUHAMMAD	12101- 3818810-5	87.92	GPS NO. 2 POTA	CHEHKAN
	176-1200	RAB NAIVAZ	GUL SHER	12101-	95.9	GPS NURANG	CHEHKAN
_ -	176-1043	ABDUL BASAT	MAULVI GHULAM HASSAN	7539649-3 12101- 3958240-7	116.49	UTRA GPS SHERU KOHNA	СИЕНКАМ
- -		SANA ULLAH	GHULAM QADIR	12101- 9636197-3	88.45	GPS SIKANDAR SHUMALI	CHEHKAN
		SHAHZADA MUHIB ULLAH	MUHAMMAD ASLAM	12101- 3837795-9	92.31	GPS:SIWAG	CHEHKAN
		MUHAMMAD ALTAF KHAN	UMAR HAYAT KHAN	12101- 7309163-5		GPS TAI NA	CHEHKAN

Page 1 of 3.

M. A HWOT AWOR Advocate Supreme Count

3					•	•	
S.No	Roll No	NAME	FATHER'S NAME	CNIC	SCORE	PLACE OF POSTING	UNION COUNCIL
; 371.	1760 <u>m</u> 13	ZIA Uİ.LAH	MUHAMMAD AMIN	12103- 4097620-3	105.95	GPS WANDA KARIM DIRKHAN	BAND KURAI
172.	1760720	SYED ZUBAIR HUSSAIN SHAH	SYED AMIR HUSSAIN SHAH	12103- 7203737-1	105.77	GPS WANDA KARIM DIRKHAN	BAND KURAI
373, .	1762611	SYED ASIF HUSSAIN SHAH	SYED TALIB HUSSAIN SHAH	12103- 4602375-1	106.11	GPS WANDA NADIR:SHAH	BAND KURAI
374. :	1760456	IMRAN HUSSAIN SHAH	IQBAL HUSSAIN SHAH	12103- 1476813-9	106.14	GPS WANDA SHAHBAZ KHAN	BAND KURAI
375. 	-1763904	BASHARAT HUSSAIN SHAH	GHULAM QASIM*SHAH	12103- 6109518-3	100.6	GPS WANDA SHAHBAZ KHAN	BAND KURAI
376.	1763393	MUHAMMAD ISMAH,	GHULAM QASIM	12103- 8942393-9	100.73	GPS WANDA UMARI	BAND KURAI
377.	1760925	HAFEÉZ ÜLLAH	GHULAM YASIN	12103- 8409583-7	119.97	GMPS MOUNDAR WALA MIAN WADDA	BIGWANI SHUMALI
378.	1760339	KALIM ULLAH	GHULAM HUSSAIN	12103- 2389960-3	98.97	GPS ASLAM ABAD	BIGWANI SHUMALI
379.: 	.1760548	MUHAMMAD PERVAZ	MUHAMMAD HANIF	12103- 1490611-7	96.51	GPS BASTI MALANA	BIGWANI
380.	- 1760818	MUHAMMADALI	JEHANZEB KHAN	12101- 6558614-5	100.3	GPS BIGWANI SHUMALI	BIGWANI SHUADULI
381.	1760923	RATIA AT ULLAH	MUHAMMAD ASHRAF	12103- 8300647-1	104.81	GPS CHAH DIYAL	BIGWANI SHUMALI
382	1764103	SYED SHAHID IMRAN SHAH	SYED MULAZIM HUSSAIN SHAH	12103- 8043509-5 ;	98.12	GPŞ CHAH INAYAT WALA KACHI	BIGWANI SHUMALI
383.	1760361	MUHAMMAD SHAUKAT ALI	SULTAN AHMAD	12103- 9885808-9	108.09	GPS CHAH LADHA	BIGWANI SHUMALI
384;	1760419	SAMI'ULAH	RAB NAWAZ	12103 <i>-</i> 1667614-3	104.57	GPS CHAH PAI WALA	BIGWANI SHUMALI
385.	1763420	TASLEEM ABBAS	ZAWAR HUSSAIN KHAN	12103- 0110985-5	97.58	GPS CHAH , SHEHZAD	BIGWANI SHUMALI
386.	1764199	FEROZ HUSSAIN	FALAK SHER	12103- 2228262-3	103.75	GPS DILAWAR ABAD	BIGWANI SHUMALI
387.	1760255	QAZI MUHAMMAD ABDUL WAHAB	QAZI KHIZAR HAYAT	12103- 1502464-7	126.23	GPS HAFIZ ABAD -	BIGWANI SHUMALI
388.	1762122	ABDUL GHAFFAR	MUHAMMAD HUSSAIN	12103- 5723200-1	119.1	GPS HAFTZ ABAD AP	BIGWANI

Page 19 of 32

VI. A mWAL AWAR Advocate Supreme Cours DIXHan

S.No	Rolf No	NAME	FATHER'S NAME	CNIC	SCORE	PLACE OF POSTING	UNION
618.	17601 <u>)</u> 1	OBAID ULLAII	KHALIL UR RAHMAN	12101- 0899685-3	124.87	GPS NO.3 PAROA	PAROA
619,	1762676	MUĤAMMAD KHALID	SAIF ULLAH	12101- 1005269-1	87.08	GPS NO.4 PAROA	PAROA
620.	1764238	SHATLNAWAZ	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	RASHLED AHMAD	DUR MUHAMMAD	12101- 5965545-1	86.05	GPS THAT SOLAN	PAROA

## TERMS & CONDITIONS

NO TA/DA etc is allowed.

2. Charge reports should be submitted to all concerned in duplicate.

3. Appointment is purely on temporary & contract basis initially for one year from the date of issuance.

4. He should not be handed over charge if he exceeds 35 years or below 18 years of age. Age relaxation case may be submitted to competent authority (if required).

5. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO, anyone found producing bogus Certificate will be reported to the law enforcing agencies for further action. Expenditure on verification will be borne by the appointees.

6. His services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.

7. Pay will not be drawn until and unless a certificate regarding verification of his documents is issued by this office.

8. He should join his post within 10 days of the issuance of this notification. In case of failure to join the post within stipulated period, his appointment will stands expired automatically and no subsequent appeal etc shall be entertained.

9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.

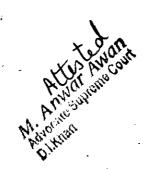
10. Before handing over charge, he will have to sign an agreement with the Department: otherwise this order will not be valid.

11. He will be governed by such rules and regulations as may be issued from time to time by the Govt.

12. His services shall be terminated at any time, in case his performance is found unsatisfactory during his contract period. In case of misconduct, he shall be proceeded under the rules framed from time to time.

13. His appointment is made on School based. He will have to serve at the place of posting, and His service is not transferable to any other station.

Page 31 of 32



- 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 pertrules 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

Dated DIKkhan the 17-05-2014

Copy forwarded for information and necessary action to

- 1. The Director E&SE Khyber Pakhtunkhwa, Peshawar
- 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 DIRHAN

Page 32 of 32

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



## OFFICE OF THE DISTRICT EDUCATION OFFICER

# (MALE) DERA ISMAIL KHAN

Tell: 09669280128- 09669280131 Email: emisdikhan@gmail.com



## NOTIFICATION:

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

Transport		<del></del>		Total Marks			Appointment	Extension order No and	CNIC
1   1760002   MUAHMMAD   93.5   GPS DARWESHA   Chehkan   Dated 17-85-2014   Dated 20-85-2017   62-8590-3	Sr	RollNo	Name	jout of	School	UC	order No and dated		
1760477	i	1760002			GPS DARWESHA	Chehkan	Dated 17-05-2014	Dated 02-06-2017	6286930-3
1760752 NAVEED AHMAD   109.58   HASSAM   Chehkan   Dated 170-52014   Dated 02-06-2017   2041550-9	?	1760477	T	97.19	GPS GARA BALA	Chehkan		Dated 02-06-2017	8038430-1
1760368   M.UHAMAMD    116.35   GPS GARA MORE   Chelikan   Dated 17-05-2014   Dated 02-06-2017   07034425-1	3	1760752	NAVEED AHMAD	109.58	*	Chehkan		No. 15408-14 Dated 02-06-2017	
1760733   RAHMAT ULLAH   95.33   GPS HAINDAN   Chehkan   No. 7135-7765   Dated 07.06-0917   57093920-3	4	1760368	1	116.35		Chehkan		Dated 02-06-2017	7034423-1
1760335   MAZHAR QBAL   87.57   SINDH   Chelkan   Dated 17.05-2014   Dated 02-06-2017   4336514-5	5	1760733		95.33	GPS HAINDAN	Chehkan			
Total	6	1760335	MAZHAR IQBAL	87.57	1 '	Chehkan			
8	7	1762690	1 '	87.92		Chehkan			
1764043   ABDUL BASA1   16.49   KOHNA   Chelkan   Dated 17-05-2014   Dated 02-06-2017   3938240-7	8	1764200		95.9		Chehkan			
11   1760822   SHAMADA   20.31   GPS SIWAG   Chehkan   Dated 17.05.2014   Dated 02-06-2017   9636197-3     11   1760822   U.I.A.M   92.31   GPS SIWAG   Chehkan   Dated 17.05.2014   Dated 02-06-2017   3637195-9     12   1760603   MUHAMMAD   ALTAF KHAN   98.29   GPS TAJ   Chehkan   No. 7135-7765   Dated 17-05-2014   Dated 02-06-2017   7309163-5     13   1762586   MATI ULLAH   112.95   GPS BASTI   DIRKHAN   DIW 1   Dated 17-05-2014   Dated 02-06-2017   7309163-5     14   1763381   MUHAMMAD   98.86   GPS CHAH   DIW 1   Dated 17-05-2014   Dated 02-06-2017   8937011-7     15   1760005   MUHAMMAD   127.49   PAIND KIIAN   DD#1   Dated 17-05-2014   Dated 02-06-2017   5971143-9     16   1763031   MUHAMMAD   WAQAR AHMAD   WAQAR AHMAD   WAQAR AHMAD   WAQAR AHMAD   WAQAR AHMAD   MALIK UMAIR   1760921   AFNAN KHAN   103.37   GPS NO. 1   THOYA FAZIL   DD#2   Dated 17-05-2014   Dated 02-06-2017   7810587-1     18   1760921   AFNAN KHAN   103.37   GPS NO. 1   DD#2   Dated 17-05-2014   Dated 02-06-2017   7810587-1     19   1760368   SAMI ULLAH   101.43   GPS NO. 2   THOYA FAZIL   DD#2   Dated 17-05-2014   Dated 02-06-2017   0217588-7     19   1760378   SAMI ULLAH   101.43   GPS NO. 2   THOYA FAZIL   DD#2   Dated 17-05-2014   Dated 02-06-2017   0953316-5     1760480   AZMAT ULLAH   101.43   GPS NO. 2   THOYA FAZIL   DD#2   No. 7135-7765   No. 15408-14   12101- Dated 02-06-2017   0953316-5     1760481   MUHAMMAD   102.24   DHAPPAN WALI   Deewala   No. 7135-7765   No. 15408-14   12101- Dated 02-06-2017   0953316-5     1760482   MUHAMMAD   102.24   DHAPPAN WALI   Deewala   No. 7135-7765   No. 15408-14   12101- Dated 02-06-2017   0953316-5     1760088   ZUILAH AHMAD   103.41   GPS CHAH   MALIK WALIA   Deewala   No. 7135-7765   No. 15408-14   12101- Dated 02-06-2017   0765340-5   07653	9	1764043	ABDUL BASAT	116.49	ł .	Chehkan			
1760822 U.L.A.II   92.31 GPS NWAU   ChehRan   Dated 17-05-2014   Dated 02-06-2017   3837795-9     12   1760803   MURHAMMAD   98.29 GPS TAJ   Chehkan   No. 7135-7765   Dated 17-05-2014   Dated 02-06-2017   7390163-5     13   1762586   MATT ULLAH   112.95 GPS BASTI DIRKHAN   DIW I   No. 7135-7765   Dated 02-06-2017   R937011-7     14   1763381   MUHAMMAD   98.86 GPS CHAH BAREY WALA   DIW I   Dated 07-06-2017   S937101-7     15   1760005   MUHAMMAD   127.49   PAIND KIJAN   DIW I   Dated 07-06-2017   Dated 02-06-2017   S937101-7     16   1763031   MUHAMMAD   112.77 GPS NO. I   DIW I   DIW I   DIW I   Dated 07-06-2017   Dated 02-06-2017   S937143-9     16   1763031   MUHAMMAD   112.77 GPS NO. I   DIW I   DIW I   DIW I   Dated 02-06-2017   Dated 02-06-2017   S937183-9     17   1760365   MALIK UMAIR   107.28 GPS NO. I   THOYA FAZIL   DIW I   Diw I   Div I   Dated 02-06-2017   T810587-1     18   1760921   AFNAN KHAN   103.37 THOYA FAZIL   DIW I   Diw I   Div I   Dated 17-05-2014   Dated 02-06-2017   T810587-1     19   1760280   AZMAT ULLAH   101.43 GPS NO. 2 THOYA FAZIL   DIW I   Div I   Dated 17-05-2014   Dated 02-06-2017   Dated 02-06-2017   Dated 02-06-2017   Dated 02-06-2017   Dated 02-06-2017   Dated 02-06-2017     176035   SAMI ULLAH   S8.19 GPS NO. 2 THOYA FAZIL   DIW I   Div I   Dated 17-05-2014   Dated 02-06-2017   Dat	10	1760108	SANA ULLAH	88.45		Chchkan			
1760005   ALTAF KHAN   98.29   GPS IAU   Chenkan   Dated 17-05-2014   Dated 02-06-2017   7309163-5	11	1760822		92.31	GPS SIWAG	Chehkan			1 1
1762586   MATI ULLAH   112.95   GPS BASTI   DD# 1   No. 7135-7765   Dated 02-06-2017   8937011-7	12	1760603		98.29	GPS TAJ	Chehkan			
14   1763381   MUHAMMAD   98.86   GPS CHAH   BAREY WALA   DD# 1   No. 7135-7765   Dated 17-05-2014   Dated 02-06-2017   597143-9   Dated 17-05-2014   Dated 02-06-2017   3032309-7   Dated 17-05-2014   Dated 02-06-2017   3032309-7   Dated 17-05-2014   Dated 02-06-2017   3032309-7   Dated 17-05-2014   Dated 02-06-2017   7810587-1   Dated 17-05-2014   Dated 02-06-2017   7810587-1   Dated 17-05-2014   Dated 02-06-2017   7810587-1   Dated 17-05-2014   Dated 02-06-2017   Dat	13	1762586		112.95		DD# I			12101-
15   1760005   MUHAMMAD   127.49   GPS KACH  PAIND KIIAN   DD#2   No. 7135-7765   Dated 17-05-2014   Dated 02-06-2017   3032309-7	14	1763381		98.86	1	DD# 1		1	12101-
16	15	1760005		127.49		DD#2		No. 15408-14	12101-
17   1760365   MALIK UMAIR YASIN   107.28   GPS NO. 1 THOYA FAZIL   DD#2   No. 7135-7765 Dated 17-05-2014   Dated 02-06-2017   4061211-7	16	1763031	WAQAR AHMAD	112,77		DD#2	No. 7135-7765	No. 15408-14	12101-
18   1760921   AFNAN KHAN   103.37   GPS NO. 1   THOYA FAZIL   DD#2   Dated 17-05-2014   Dated 02-06-2017   0217583-7     19   1760280   AZMAT ULLAH   101.43   GPS NO. 2   THOYA FAZIL   DD#2   Dated 17-05-2014   Dated 02-06-2017   0953316-5     20   1760338   SAMI ULLAH   SAMI   SAMI ULLAH   SAMI ULL	17	1760365		107.28	GPS NO. 1	DD#2	No. 7135-7765	No. 15408-14	12101-
1760280   AZMAT ULLAH   101.43   GPS NO. 2   THOYA FAZIL   DD#2   Dated 17-05-2014   Dated 02-06-2017   0953316-5	18	1760921	AFNAN KHAN	103.37		DD#2	No. 7135-7765	No. 15408-14	12101-
1760338   SAMI ULLAH   SAMI   SAMI ULLAH   SA	19	1760280	AZMAT ULLAH	101.43		DD#2	No. 7135-7765	No. 15408-14	12101-
21   1760755   MALIK   MUHAMMAD   102.24   GPS TAHIM   ABAD   DB#2   No. 7135-7765   No. 15408-14   12101-	20	1760338	1	91.13	GPS NO. 2	DD#2	No. 7135-7765	No. 15408-14	12101-
22   1760835   MUHAMMAD   102.24   GPS BASTI   Deewala   No. 7135-7765   No. 15408-14   12101-   1760648   MUHAMMAD   107.04   GPS CHAH   MALIK WALA   Deewala   No. 7135-7765   No. 15408-14   12101-   1760028; MUHAMMAD   105.62   GPS CHAH   MALIK WALA   Deewala   No. 7135-7765   No. 15408-14   12101-   1760028; MUHAMMAD   105.62   GPS CHAH   MALIK WALA   Deewala   No. 7135-7765   No. 15408-14   12101-   1760808   ZUBAR AHMAD   103.41   GPS MADNI   Deewala   No. 7135-7765   No. 15408-14   12101-   1760808   ZUBAR AHMAD   103.41   GPS MADNI   Deewala   No. 7135-7765   No. 15408-14   12101-   1760808   ZUBAR AHMAD   103.41   GPS MADNI   Deewala   No. 7135-7765   No. 15408-14   12101-   1760808   TOMBAL   T	21	1760755	MUHAMMAD	88.19	GPS TAHIM	DD#2	No. 7135-7765	No. 15408-14	12101-
23   1760648   MUHAMMAD   107.04   GPS CHAH   Deewala   No. 7135-7765   No. 15408-14   12101-   1760028;   MUHAMMAD   105.62   GPS CHAH   MALIK WALA   Deewala   No. 7135-7765   No. 15408-14   12101-	22	1760835		102,24	1	Deewala		No. 15408-14	12101-
24   1760028;   MUHAMMAD   105.62   GPS CHAFF   Deewala   Deewala   No. 7135-7765   No. 15408-14   12101-	23	1760648	1	107.04	GPS CHAH	Deewala	No. 7135-7765	No. 15408-14	12101-
25 1760808 ZUBAIR AHMAD 103.41 GPS MADNI Decwala No. 7135-7765 No. 15408-14 12101-	24	1760028		105.62	GPS CHAIL	Deewala	No. 7135-7765	No. 15408-14	12101-
	25	1760808	ZUBAIR AHMAD	103.41	GPS MADNI	Decwala	No. 7135-7765	No. 15408-14	12101-

in only South

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

Sr	Roll	INo		Name	Total Marks Jout of 200]		School	UC	Appointment order No and dated	Extension order No and dated if any	CNIC
	176			AMMAD	96.79	GPS	NO. 2 MADDI	Maddi	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12102- 8171676-9
309 	<del></del>			Z UR REHMAN	119.23	GPS	NO. 3 MADDI	Maddi	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12102- 8432598-3
310	<del></del>	0401	MUI	IAMMAD	115.05	GP:	S NO. 3 MADDI	Maddi	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	9927407-1
311		63564	KHA	LID SHAN FAKHAR	94.03	GP KH	S QADAM	Maddi	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 5952328-5
312		60559	<u> </u>	AZ AHMAD	98.5		S WALI DAD	Maddi	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12102- 3481070-3
313		160870	ABI	J NASAR HAMMAD	95.56	GF	S GARA IULAM	Musa Zai Sharif	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 0981527-3
31		760439	MU	RSA HAMMAD MAN	104.	GF	DDIQUE PS GARA EHRBAN	Musa Zai Sharif	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017 No. 15408-14	12104- 4621402-5
1		763344		IND KHAN	96.5	, Gi	PS GARA HEIKH	Musa Zai Sharif	No. 7135-7765 Dated 17-05-2014	Dated 02-06-2017	4299749-5 12104-
\	<del>-  </del>	1763490	AL A	VAD AHM <b>A</b> D	110		PS KIKRI	Musa Zai Sharif	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	4884290-3 12102-
-		1760745	1 ·	KAULLAH	117		PS KOT SHAH AWAZ	Musa Zai Sharif	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	1611179-5
-	319	1760810	-\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	HAN HEIKH ABU AKAR	109.	,, G	PS MOHALLAH HAN KHEL	Musa Zai Sharif	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	2157522-7
}-	320	1763546	<u></u>	MIR HAMZA	1/21	70 0	PS NAI ABADI IUSA ZAI	Musa Zai Sharif	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	0478550-3
	321	1762078	3 8	AMI ULLAH	121	.49	O'S NO. 1 MUSA	Musa Zai Sharif	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	6105338-3
-	322	176309	nı.	KIRAMAT ULLAH KHAN	10	6.4	JPS NO. 2 MUSA 'Al	Musa Zai Sharif	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	2140853-3
+	323	176252		REIMAT ULLAH	111	LOLE	OPS AMAN NBAD	Band Kurai	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	1552417-5
	324	176061		LIAQAT HUSSAIN KHAN	129	9.02	OPS BAND KURAI	Band Kurai	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	3730498-5 12103-
. !	325	17634		SHUAIB AHMAD	10	9.96	GPS BAND KURAI	Band Kurai	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017 No. 15408-14	9925917-1
	326	17640	78	REHMAT ULLAH	10	7.03	GPS KALOO QALANDAR	Band Kurai	No. 7135-7765 Dated 17-05-2014	Dated 02-06-2017 No. 15408-14	1861331-9
	327	17625	12	MUHAMMAD QAYYUM	12	2.17	GPS KOT MASOODAN	Band Kurai	No. 7135-7765 Dated 17-05-2014 No. 7135-7765	Dated 02-06-2017 No. 15408-14	0447973-9
•	328	17605	31	MUHAMMAD ZUBAIR KHAN	11	6.33	GPS KOT MASOODAN	Band Kurai Band	Dated 17-05-2014 No. 7135-7765	Dated 02-06-2017 No. 15408-14	6799253-7
	329	17641	152	SAIFUR REHMAI	V 11	9.28	GPS KOT MASOODAN	Kurai	No. 7135-7765 Dated 17-05-2014 No. 7135-7765	Dated 02-06-2017 No. 15408-14	5892310-7 12103-
	330	1763:	586	BASUIR KHAN	11	05.43	GPS KOT RASCOL GPS NAI ABADI	Kurni	Dated 17-05-2014 No. 7135-7765	Dated 02-06-2017 No. 15408-14	3223023-9 12103-
	331	1760	327	ABID ZIA		08.4	B KURAI	Kurai Band	Dated 17-05-2014 No. 7135-7765	Dated 02-06-2017 No. 15408-14	2993497-9 12103-
	332	1763	299	FARASAT HUSS SHAH	ALN   1	02.17	OPS RODI KHEL	Kurai Band	Dated 17-05-2014 No. 7135-7765	Dated 02-06-2017 No. 15408-14	1757616-3
,	333	1763	095	ISLAM UD DIN		01.83	GPS RODI KHEL	Kurai Band	Dated 17-05-2014 No. 7135-7765	Dated 02-06-2017 No. 15408-14	2707747-7 12103-
	334	1764	1011	BILAL SYED ZUBAIR		14.56	GPS TOBA GPS WANDA	Kurai Band	No. 7135-7765	Dated 02-06-2017 No. 15408-14	1779028-7
	335		0720	HUSSAIN SHAH SYED ASIF	—— <u> </u> -	05.77	KARIM DIRKHA GPS WANDA	N Kurai Band	No. 7135-7765	No. 15408-14	7203737-1 12103-
	336		2611	HUSSAIN SHAH	<u></u>	106.11	NADIR SHAH GPS WANDA	Kura Band	No. 7135-7765	No. 15408-14	12103-
	337		0456	SHAH BASHARAT		106.14	SHAHBAZ KHAN GPS WANDA	N Kura Band	No. 7135-7765	No. 15408-14	1476813-9
	338	<del></del>	3904	HUSSAIN SHAF		100.6	SHAHBAZ KHAI GPS WANDA	N Kura Band	No. 7135-7765	No. 15408-14	6100518-3 1 12103- 8942393-9
1	339		50925	HAFEEZ ULLA		119.97	WALA MIAN	Bigwa Shum	mì No. 7135-7765	No. 15408-14	12103- 8409583-7
	34	1 170	60339	KALIM ULLAF	1	98.97	GPS ASLAM ABAD	Bigw		No. 15408-14 4 Dated 02-06-2017	12103- 2389960-3
:	34	2 17	60548	MUHAMMAD		96.51	GPS KIRRI SARWAR	Blgw	nni No. 7135-7765	No. 15108-14	12103-
	34	3 17	60923	RAHMAT ULL	AH_	104.8	CDS CLIAN	Blgw Shun	ani No. 7135-7765	No. 15408-14	12103-
	Ţ					_					

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RUNGER AND SOUTH

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

Sr	RollNo	Name	Address	Total Marks Jout of 200]	School	υC	Appointment order No and dated	Extension order No and dated if any	CNIC
1	2332009995	RISHI HANS	DLKhan	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.

3. 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.

6. They shall possess the same qualification and experience required for a regular post.

7. They shall have not resigned from their services or terminated from services on account of misconduct, inefficiency or may 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. <u>87/2 - 10760</u> /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

DISTRICT EDUCATION OFFICER (MALE) DERA ISMAI KHAN

GOVERNA CONFIGERORISME

A SURVENIE PROPERTY OF A COLUMN TO A COLUM

EndsteNo IF728

6-

Dated Dakera

10

The Director :

Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar

Subject:

GUIDANCE REGARDING SENIORETY LIST OF PST

Respected Sirgan

It is stated for your kind information that a letter bearing No. 34832 dated [24] 2.4 0) on the subject cited above has been submitted to your good office but no guidance improvided in this regard till yet.

It is requested that seniority list of PST (NTS) is under process of appearing nos

Whether the seniority list is updated according to merit score of the teachers or from their date of taking over charge and then on raige.

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 Senitority on collective.

DISTRICT EDUCATION OFFICER (MALE) DERATSMALE MANN

Endst: No. 11 729-33/

•

Direct: <u>64 | 66 | 1626</u>

Copy for information to the:-

- PA to Director Elementary & Secondary Education Khyben Pakhtan Khy
- Deputy District Education Officer (Male) DIRhans
- 3. All the SDEO's (Male) in District Dera Ismail Khub.
- 4. PA to DEO (Male) DIKhan.

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# DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR.

No. 64/6 /F. No. Appeal D I Khan Dated Peshawar the 2/1/6/2020.

To,

The District Education Officer (M) D I Khan,

Subject: .

GUIDANCE REGARDING SENIORITY LIST OF PST.

Memo:-

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

Assistant Director (Estab :) Elementary & Secondary Edu: Klyber 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.

M. Anwar Awan
M. Anwar Suprema Court

Mary Suprema Court

Circust



### 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)

...le 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.

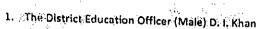
	RIAL	CNIC	NAME	FATHER NAME	DOMICILE	PRESENT PLACE OF POSTING	T DATE OF BIRTH	DATE OF TAKING CHARGE	SCORE	TEHSIL	METHOD OF APPOINTMENT	REMARKS
پرستين د څو خا	٠	12101- 8104636-5	SHAH JAHAN	GUL DAD	ĎΪΚ	GMPS JALAL BORING	17 Mar 1961	01 Feb 1979	• •	DIKHAN	DIRECT APPOINTMENT	
		12101- 8000082-7	AZIZ ULLAH	SAAD ULLAH	ĎΙΚ	GPS DIN PUR	20 May 1961	26 May 1982	<u>i</u>	DIKHAN	DIRECT APPOINTMENT	
H. V	1	12103- 1490966-3	MUSHTAQ AHMAD	RAB NAWAZ		GPS MITHA PUR KALAN	10 Apr 1962	16 Dec 1982	1	PAHARPUR	DIRECT APPOINTMENT	
	→ · i	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	•
		12101- 0961741-7	ASEEM KHAN	AZAM KHAN	DIK	GPS GILOTI	01 May 1963	19 May 1984	J	DIKHAN	DIRECT APPOINTMENT	
•		12101- 0965650-3	MUHAMMAD RASHID	GHULAM JEELANI	DIK	, GPS KOKAR GHARBI	10 Sep 1961	05 Sep 1984	<b>.</b>	DIKHAN	DIRECT APPOINTMENT V	
ج. (فيمتر)	- majt zn 4	12102- 2150050-7	ABDUL SAMAD KHAN	ABDUL GHAFAR	DIK	GPS BAS'IT BALOCHAN	28 Apr 1961	17 Oct 1984		DARABAN KALAN	DIRECT APPOINTMENT	<u>:</u>
, <del>a</del> 1 - 2,	Ų	12101- 0939011-5	ABDUL RASHID	IMAM BAKHSH	DIK	GMPS HAZARA PAKKA	15 Oct 1963	17 Oct 1984		PAROVA	DIRECT APPOINTMENT	
	16 —	:2103- 1501762-9	MUHAMMAD ABBAS SHAU	ABBUL HUSSAIN SHAH	DIK	GPS SAID ALIYAN	15 Apr 1965	17 Oct 1984		PAHARPUR	DIRECT APPOINTMENT	•



	12104-	TOTAL CANDULE	- SHEIKH YAYAH АНМАD	DIK	GPS KOT LALOO	25 Aug 1992	- · 17 May 2014	. 105.30	DARABAN KALAN	NTS	4.	
459	4204762-1 12103-	SHEIKH ABDUL QADDUS  RAHMATULLAH	ABDUR REHMAN	DIK.	GPS WANDHI BOCHRA	- .15 Feb 1987	17 May 2014	105.23	PAHARPUR	NTS		
460	5738298-7 12101-	ISHTIAQ AHMED	SUFI GHULAM HASSAN	DIK	GPS KPK	23 Mar 1976	05 Dec 2014	105.22	DIKHAN	NTS		
462	12101-	WAQAS IQBAL	MUHAMMAD IQBAL	DIK	GPS NO. 7 DIKHAN	11 Mar 1989	05 Dec 2014	105.15	DIKHAN	NTS		
463	2740650-9 12101-	SHAUKAT IQBAL KHAN	AMAN ULLAH	F 3 Ks. L DIK ≀	GPS GARA GHOUS SHAH	,06 Feb 1987	17 May 2014	105.03	PAROVA	NTS		
464	3535761-3 312101-	RAJA MUHAMMAD	MUHAMMAD LATIF	DIK	GPS DIN PUR	25 Dec 1990	17 May 2014	105.01	DIKHAN 3	NTS		
465	2.0569763-7 12101-	FATEHE SHER	KHUDA BAKHSH	DIK	GPS DARABAN KHURD	15 Feb 1985	17 May 2014	105.00	PARQVA	NTS	AS NA	<b>.</b>
466	4284847-9	KHIZER HAYAT	UMER HAYAT	DIK	GPS SOHLAN	20 Jan 1980	17 May 2014	104.94	DIKHAN	NTS	135	i cui
M 467	20916606-9 212102-	MUHAMMAD IMRAN	UMAR DARAZ KHAN	DIK	GPS QASIM ABAD	07 Sep 1982	17 May 2014	104.92	KULACHI	INTS	- Ox	30
1 1 1 1	度2151325-1 12102- 2156233-1	MUHAMMAD IQBAL	GHULAM KHIZAR	DIK	GPS GARA ABDULLAH	25 Sep 1981	17 May 2014	104.90	KALAN	NTS		A LI
	4917889-7	TANSEER ABBASS	ІМАМ ВАКНЅН	DIK	GPS NO. I HAJI MORA	13 Aug 1991	17 May 2014	104.89	DIKHAN	NTS	_ <del>-</del>	ZZG
470	12103- - \$300647-1	RAHMAT ULLAH	MALIK ASHRAF	DIK	GPS CHAH DIYAL	03 Mar 1983	17 May 2014	104.81	PAHARPUR	NTS		•
471	-17101-	MUHAMMAD NOMAN	ELLAHI BAKHSH ASIM	DIK	GPS NO. 8 DIKHAN	14 Aug 1992	17 May 2014	104.76	DIKHAN	NTS	<u></u>	
472	12103- 4-11501803-9	SYED IQBAL HUSSAIN	S.FEROZ HUSSAIN SHAH	DIK	GPS BIGWANI SHUMALI	18 Feb 1983	05 Dec 2014	104.68	PAHARPUR	NTS	<b>†</b>	
	€:12101-	MUHAMMAD ZOHAIB	GHULAM QASIM	DÎK		19 Jun 1991	17 May 2014	. <del>.</del>	DIKHAN	NTS		!
474	112103- 1667614-3	SAMI ULLAH	RAB NAWAZ	DIK	t	05 Jan 1986	17 May 2014	104.57	PAHARPUR	NTS	7	₹ •
475	1400318 1	GHULAM QASIM	GHULAM AKBAR	DIK	,WALI	11 Dec 1978	05 Dec 2014	104.49		NTS		
476	12101- 2909224-3	REHMAT ULLAH	GHULAM QASIM	DIK	GPS CHAH FAQEER WALA	03 Nov 1988	05 Dec 2014	104.49	DIKHAN	NTS		
477	12105-	MUHAMMAD KAMRAN	MALIK SOOBA	DIK	GPS JATTA	10 Apr 1989	17 May 2014	104 43		NTS		
478	12101- 9464634-5	KALEEMULLAH KHAN	AZHAR OBAIDULLAH JAN	DIK	GPS SULTANIA MURYAL	.l 01 Mar 1975	17 May 2014	104,40	DIKHAN	NTS	a a	
479	12103-	JALAL UD DIN	AMIR KHAN	DIK		03 Aug 1990	17 May 2014	104.31	PAHARPUR	NTS		·
4.	12101- • 2639051-9	MUHAMMAD TAHIR SIDEEQ	GHULAM SIDEEQ	DIK	GPS BASTI SHEKHAN WALI	08 Mar 1991	17 May 2014	104.31	PAROVA	NTS NTS		
481	12102-	ABDUS SAMAD KHAN	MUHAMMAD IRSHAD KHAN	DIK	GPS NO I RANAZAI	15 Mar 1983	17 May 2014	104 15	KULACHI	019		
			•			•						



To,



Royald State of the State of S

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

Most respectfully, it is stated that District Education Officer D. 1, 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 Hannex "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").

Attisted

M. Anwar Awar

Advocad Suprame Cour

Advocad Suprame Cour

Advocad Suprame

Aman

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/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.

NA A HOUSE AND A COMP ACTION OF A COMP -19-

PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, SENIORITY/PROMOTION &TRANSFER) RULES, 2989 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

ATUSTED AWAN Anwar Awan Adverso Supremo Coun

Listury PS4 DIST - 14-13 0345 7373705 159 Eggs 857 PST (1 · 11/6 ا امراد صر ۱۶۶ PST سعرف را 246:7976732 0346.7878562 SLTJ GPS PST JICHOI (3 ر) عبداللين PST يعاند رال ماعد 1315. 9839 ك PST Julius (5 6195 - 1988816 كالا 3198 - 1988 ۵) مبدالی PST مبدالی دو 03444090374 7) سَمَاهُ فَازُ 475 \$ \$ مِنْهُ فَالْمُ عَلَيْهُ مِنْ \$ \$ \$ \$ مِنْهُ فِي الْمُحْمَدِ مِنْهُ فَالْمُعْمِدِ وَمِنْهُ فَالْمُعْمِدِ وَمِنْهُ مِنْهُ فَالْمُعْمِدِ وَمِنْهُ مِنْهُ فَالْمُعْمِدِ وَمِنْهُ مِنْهُ فَالْمُعْمِدِ وَمِنْهُ مِنْهُ فَالْمُعْمِدِ وَمِنْهُ مِنْ مُنْفِقُونُ وَمِنْهُ وَمِنْ مُنْفُونُ وَمِنْهُ وَمِنْهُ وَمِنْهُ وَمِنْهُ وَمِنْهُ وَمِنْهُ وَمِنْ فَالْمُونُ وَمِنْهُ وَمِنْهُ وَمِنْهُ وَمِنْهُ وَمِنْ مُنْفُونُ وَمِنْهُ وَمِنْ مُنْفُونُ وَمِنْ مِنْفُونُ وَمِنْ مُنْفُونُ وَالْمُنْ مُنْفُونُ وَمِنْ مُنْفُونُ وَالْمُنْ مُنْفُونُ وَمِنْ مُنْفُونُ وَمِنْ مُنْفُونُ وَمِنْ مُنْفُونُ وَمِنْ مُنْفُونُ وَمِنْ مِنْ مُنْفُونُ وَمِنْ مِنْ مُنْفُونُ وَمِنْ مِنْ مُنْفُونُ وَمِنْ مُنْفُونُ وَالْمُنْفُونُ وَمِنْ مُنْفُونُ وَمِنْفُونُ وَمِنْ مُنْفُونُ وَالِمُونُ مُنْفُونُ وَمِنْ مُنْفُونُ وَالْمُنْ مُنْفُونُ وَالْمُنْفُونُ وَمِنْ مُنْ مُنْ مُنْفُونُ وَالْمُنْ مُنْمُونُ وَالْمُنْ مُنْ مُنْفُونُ مُنْفُونُ وَالْمُنْفُونُ وَالْمُنْ مُنْ مُنْفُونُ BY SIN GAS PST CHE TILE (8 03459849865 03446596979 . KJH CAPS PST mes 19 M. Agenir Gul 300 ال الدار في الرائد المالي المالي الرائد المالي الرائد المالي المالي المالي المالي المالي المالي المالي المالي gard ال) المراحال ۱۶۳ والمال المراد ب (درار) المراد ب (درار) المراد بي helpon Q Nush. والمارك، قولور ماركت ، بالواد الما المراكب في إلى المن والك المال Angrel

C313.2452434 July Caps (PS7) in 18452434 (PS7) 0 0 ج اجمير Monagh 0343-2996815 - 1/100 pm Jun 6 M (A) = 03458834111 . Cel 3/1 Blat 03401987452 1 00 0 20 110 Druge & في محدانها ل Jun 0315-9467336. UEUL و عايدس (A) 0345-9872124 2 1020 11. PST solice 1683 11/1/2 Wet of Dillo 11 وقع اخترضير ٢٥٢ 19/ 19/ 03/ Spa Ouly 3 11 19, 24, 3/83 PST 236 (26) 27) علام ما ع 11 ع فدأمحد 29) مجراحفر ال جيالي بكوائي شرالي . 11 21231-30 الا ـ ايال الكر جی نوائیں برکہ AL 11 32 . 3 آيال هني کر لي

Attioted

DIKHMI W.-AMVICE ANNE W.-AMVICE ANNE

21-

BEFORE THE

Service Tribunal PeshawaDERA ISMAIL KHAN

Rehmat ullah VERSUS Gout of KD

TITLE Appeal

I/WE Rohmat ullah

The Above Named Appellan hereby appoint

# MUHAMMAD ANWAR AWAN ADVOCATE SUPREME COURT,

in the above Captioned Cases to all or any of the following Acts Deeds & Things.

- To Appear, Act & Plead for Me/Us in the above mentioned cases in this Court/Tribunal in which the same may be tried or heard or any other proceedings out of our connected therewith.
- ✓ To Sign, Verify, File OR Withdraw all proceedings, Petitions, Appeals, Affidavits, Applications for Compromise OR Withdrawals OR for the Submission of Arbitration of the said case OR any other Documents may be Deemed Necessary OR Advisable by them by the Conduct, Prosecution OR Defense of the above case at all its stages.
- ✓ To Receive Payments, Issue receipts for all moneys that may be OR become Due & Payable to us during the course on Conclusion of the Proceedings.
- √ To do all other Acts & Things, Which may be Deemed Necessary OR Advisable during the course
  of Proceedings.

#### AND HEREBY AGREE:

- > To Ratify Whatever Advocates may do the Proceedings.
- Not to Hold the Advantages Responsibilities if the said case be proceed Ex-parte OR Dismissed in Default in Consequence of their Absence from the Court when it is called for Hearing.
- That the Advocates shall be entitled to withdraw from the Prosecution of the said case if the Whole or any part of the Agreed Fee Remain Un-Paid.
- > That Advocates may be Permitted to argue any other point at the time of Arguments.

In Witness Whereof I/We have signed this Vakalatnama here under the Contents of which have been Read/Explained to Me/Us which is fully understood by Me/Us.

Dated: \_\_\_\_\_

Accepted By:

SIGNATURE OF EXECUTANT (S)

MUHAMMAD ANWAR AWAN ADVOCATE SUPREME COURT 03339962231

#### SERVICE APPEAL No. 7509/21

Syed Sohail Ahmad Shah Gillani & 33

Government of KPK

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03	Affidavit	*****	/3
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District Education Officer (Male) Dera Ismail Khan

S.A:. no:. 7524/2021
Rehmat-ullah.

### BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

#### SERVICE APPEAL No. 7509/21

1. Syed Sohail Ahmad Shah Gillani & 33	VS	Government of KPK
2. Syed Shoaib Imran	VS	Government of KPK
3. Guizar Khan	VS	Government of KPK
4. Zahir Hussain Shah	$\overline{\mathbf{v}}\mathbf{s}$	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	$\nabla S$	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. limdad Hussain	VS	Government of KPK
25. Ihsan Ullah	VS	Government of KPK
26 Muhammad Zarif	VS	Gov nment of KPK
27. Kehmat Ullah	$\mathbf{VS}_{\mathbf{S}}$	Gov nment of KPK
28 Abdul Ghafoor	VS	Government of KPK
20. Haji Ahmad	VS	Government of KPK
30. Inidad 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 RESPON

- 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 leaches.
- 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
- 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 1 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.

on 05-12-2014. ...

## **Grounds**

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



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

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

Secretary E&SE KPK

Director E&SE KPK Peshawar

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

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

William.

Respondent No. 4 Assistant Director Estab KP Peshawar

SDEO (M) D I Khan

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

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

Vetted subject to necessary concertionsattachneni

Submitted for vetting . S. Schae's along with 33 being Same M-Kamvan. Khan; and indentical nature. 06.8.2022. Marks



# 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.

Copy forwarded for information to the:

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

District Education Officer (Male) Dera Ismail Khan

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

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

The committee consists of following members.

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

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

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

The committee after consultation with the respective ASDEOs of all the 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.

SERIALIA CNIC	NAME	FATHER NAME	PRESENT PLACE OF POSTING	DATE OF	DATE OF TAKING CHARGE	SCORE	TEHSIL	METHOD OF APPOINTMENT	REMARKS
30. 3			Q .	17 Mar 1961	01 Feb 1979	<u> </u>	DIKHAN	DIRECT APPOINTMENT	
12101- 1 8104636	SHAH JAHAN	GUL DAD	ATAKS CIVILS 37 ALL		26 May 1982		DIKHAN	DIRECT APPOINTMENT	
2 12101- 2 8000082	A717 111 I AH	SAAD ULLAH	DIK GPS DIN PUR	-	16 Dec 1982	1	PAHARPUR	DIRECT APPOINTMENT	
12103- 1490966	MUSHTAO AHMAD	RAB NAWAZ	DIK GPS MITHA PUR KALAN	10 Apr 1962	17 Nov 1983	1	PAHARPUR	DIRECT APPOINTMENT	
12103- 1482132	ALLAH NAWAZ	MUHAMMAD NAWAZ	DIK GPS KALA GORH	10 Sep 1962	20 Dec 1983	-	PAHARPUR	DIRECT APPOINTMENT	
12013-	GHANI-UR-REHMAN	SHER DIL	DIK GPS NO. I PAHARPUR	01 Nov 1962		<del></del>	DIKHAN	DIRECT APPOINTMENT	
3841194 12101-	ASEEM KHAN	AZAM KHAN	DIK GPS GILOTI	01 May 1963		<u> </u>	DIKHAN	DIRECT APPOINTMENT	
096174 12101-	MI HAMMAD RASHID	GHULAM JEELANI	DIK GPS KOKAR GHARBI	10 Sep 1961	05 Sep 1984		DARABAN	DIRECT APPOINTMENT	
096565 12102- 215005	ARDITI SAMAD KHAN	ABDUL GHAFAR	DIK GPS BASTI BALOCHAN	28 Apr 1961	17 Oct 1984		PAROVA	DIRECT APPOINTMENT	
12101- 9 12101- 093901	ARDUI RASHID	IMAM BAKHSH	OK GMPS HAZARA PAKKA	15 Oct 1963			PAHARPUR	DIRECT APPOINTMENT	
12103-	PARRA GLANALAD ARRAS	ABBUL HUSSAIN SHAH	DIK GPS SAID ALIYAN	15 Apr 1965	17 Oct 1984	<u> </u>		مان المستونية عام ما وسميتسبيه و والمان والمان بيار	

	district the little of							5110 48	DIKHAN, "	NTS THE REST	共產黨
	2101	5/VIII (	IABIB ULTAH KHAN		S NO 9 DIKUAN 4 20 PS NO 4 DARABAN 1 15 L	0 Jan 1976	17 May 2014	Section Property	ARABAN	NTS	
nounced	2102- 620619-1		IISAR AHMAD	K	ALAN		17 May 2014	129.22	KULACHI	NTS	
A DY CST	2102- 3786840-3	STIPA QAT CLEET	BARKATULLAH KHAN			14 Aug 1981	17 May 2014	129.02	PAHARPUR	NTS	
	12103- 3730498-5	LEAGATTAGE	Croadin Hossian III		PS BAND ROLU II	11 Dec 1987	17 May 2014	128.85	DIKHAN .	NTS	
	12101- 6238687-7	IRSHAD ULLAH	MUHAMMAD IQBAL	45.45.61	IFS NO TOLECT	14 Jan 1988	17 May 2014	128.69	DIKHAN	NTS	<u> </u>
12.5	12101- 4778025-1	MUHAMMAD FAHEEM	SALIM NAWAZ			15 Mar 1984	17 May 2014	128.47	DIKHAN	NTS	ļ
	12101- 2334729-5	NAQEEB ULLAH	ABDUL LATIF	15.76	GPS WANDA HAIBATTI	06 Jan 1986	17 May 2014	128.28	PAHARPUR	NTS	
	12103- 6465101-9	MUHAMMAD BILAL	ABDUR REHMAN	E 3 (34)	01311021121	20 Apr 1987	05 Dec 2014	128.25	KULACHI	NTS	
	12102- 8779268-1	HIZBULLAH KHAN	MUHAMMAD ABBAS KHAN	A. M. M. S.	GPS NO.1 TAKWARA GPS RANG PUR SHUMALI	ļ	17 May 2014	127.91	PAHARPUR	NTS	
263	12103- 7927358-5	MUHAMMAD IRFAN	BASHIR AHMAD			24 Apr 1981	05 Dec 2014	127.84	PAHARPUR	NTS	
216	12103- 5196931-7	MUHIB HUSSAIN SHAH	SYED RIAZ HUSSAIN SHAH	192	GPS NO. 2 DHALLAH GPS WANDA NARKANI	04 Feb 1993	17 May 2014	127.73	PAHARPUR	итѕ	
1,12	12103- 5436677-1	MUHAMMAD SHOAIB KHAN	BRAHIM KHAN	6.37	GPS WANDA TALGI	19 Sep 1989	05 Dec 2014	127.55	PAHARPUR	NTS	
	11201- 6609430-1	ASSAD HUSSAIN SHAH	MASROOR HUSSAIN SHAH			10 Apr 1982	17 May 2014	127.49	DIKHAN	NTS .	
Jos.	12101- 3032309-7	MUHAMMAD YOUNIS	MUHAMMAD RAMZAN	DIK	GPS KPK  GPS KOT MASOODAN	02 Jan 1977	05 Dec 2014	126.77	PAHARPUR	NTS	
	12103- 1501335-9	ABDUR RAUF KHAN	MAAZ ULLAH KHAN	2000	1	16 Mar 1985	17 May 2014	126.62	PAROVA	NTS	
202	12101- 3144698-1	ISRAR MUHAMMAD	минаммар вакнян		GPS IHOKE GUMLA GPS HAFIZ ABAD	25 Feb 1986		126.23	PAHARPUR	NTS	
221	12103- 1502464-7	QAZI MUHAMMAD ABDU WAHAB	QAZI KHIZAR HAYAT	DIK		15 Sep 1990		125.50	PAROVA	NTS	
2	12105- 20354017-3	RIAZ ALI KHAN	NIAZ ALI KHAN	e Dik	GPS GARA RASHEED	03 Dec 1985		125.3	8 PAROVA	NTS	
24	12101- 2071864-1	SHOAIB UR REHMAN	GHULAM SUBHANI	DIK	GPS BALOCH NAGAR	20 Dec 198		4 124.5	4 DIKHAN	итѕ	
25	12101- 8953208-5	MUHAMMAD ZUBAIR	MUHAMMAD JAVEED	DIK		03 Jul 1987		4 124.5	0 PAROVA	NTS	
226 226	12101- 5048995-5	HIDAYAT ULLAH	MUHAMMAD AFZAL	- DIK	GPS BUCHRI	03 Sep 198		4 124.2	9 PAHARPUR	NTS	
227	12103- 6391600-7	MUHAMMAD TARIQ	ABDUL QAYYUM		GPS ASIF ABAD	10 Feb 198		14 123.	7 KULACHI	NTS	
228	12102- 2136771-9	IMRAN ULLAH	ABDUL WAHAB	E COM	GPS BEHLOL KHEL						

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	Y STATE	できる。		The state of the s	100 mg 4		10 Mar 1988	<b>人工的设施的。在1000年</b>	123.85	PAHARPUR	NTS	Vice Adam con a
	Series or	3750799-1	NAZIR AHMAD KHAN	MUHAMMAD KHAN a		GPS HASSANI KHEL		05 Dec 2014	<u> </u>	DIKHAN	NTS	
	6-804 MA	12101- 8111998-7	MUHAMMAD ZAFFAR	ALLAH BAKHSH	DIK.	GI 3 MAGNETECT CO.	, , , , , , , , , , , , , , , , , , ,			PAHARPUR	NTS	
•		12103- 2562738-1	MUHAMMAD IMRAN	SHER MUHAMMAD		GPS RAJAN PUR •	10 Mar 1991	17 May 2014				-
		12101-	MUHAMMAD IBRAHIM	MOLVI IMAM BAKHSH	Oik	GPS JATTA	02 Jul 1984	17 May 2014	123.29	PAROVA	NTS	
		0991881-9 12103-	MUHAMMAD QAYYUM	ROZI KHAN	DIK	GPS TOBA	25 Apr 1983	17 May 2014	122.17	PAHARPUR	NTS	<del></del>
		0447973-9 12103-		MUHAMMAD RAMZAN	e DIK	GPS NO.2 PAHARPUR	14 May 1986	17 May 2014	122.07	PAHARPUR	NTS	<u> </u>
		9464400-9 12103-	MUHAMMAD IRFAN		AND THE PROPERTY.	GPS KHOKHAR	03 Jul 1981	17 May 2014	122.05	PAHARPUR	итѕ	
	215	5710032-5	SARDAR KHAN	ABDUL SATTAR KHAN	0305		15 Mar 1985	17 May 2014	121.91	DIKHAN	NTS	
,	2236	12101- 9375468-1	FAZAL UR RAHIM	ABDUR RAHEEM		GPS NO 2 GILOTI GPS KACHA MALLANA	ļ	<u></u>	121.90	PAROVA	NTS	
	2011	12101- 9315198-9	SYED ZAIGHAM ABBAS SHAH	GHULAM RASOOL	ЮIK	NOI	02 Aug 1986	17 May 2014	<del> </del>	DARABAN	NTS	1
	2011	12104-	SAMI ULLAH	HIDAYAT ULLAH	DIK	GPS NO. 1 MUSAZAI	21 Apr 1992	17 May 2014	121.49	KALAN	<u> </u>	<del> </del>
		6105338-3 12101-	МИНАММАД	SAIF UR REHMAN	DIR	GPS.NO 6 DIKHAN	01 Apr 1988	05 Dec 2014	121.45	DIKHAN	NTS	
		9631824-1 12104-	ZULQARNAIN HAIDER	MAOBOOL AHMAD	Dik	GPS KHIARA FATEH	13 May 1987	17 May 2014	121.39	DARABAN KALAN	NTS	
		0478550-3 12101-	AMIR HAMZA			MUHAMMAD GPS KURAI	03 Feb 1989	17 May 2014	121.37	DIKHAN	NTS	
		9086383-7	MUHAMMAD ARSHAD	MUHAMMAD JAAN	10.6		02 Jan 1988	17 May 2014	121.17	DIKHAN	NTS	
•		12101- 4770275-3	MUHAMMAD SHAFIQ	ABDUL LATIF		GPS TEEKIN GPS CHAH MUNDHR	<del></del>	-	119.97	PAHARPUR	NTS	
		12103- 8409583-7	HAFEEZ ULLAH	GHULAM YASIN	DOK	WALA	10 Sep 1984	17 May 2014	<del></del>		hrre	
		12103	MOHAMMAD ARIF	ABDUL ALEEM	, Figure	GPS KURRAR	02 Feb 1980	17 May 2014	119.96	PAHARPUR		
•		8705620-7 12101-	MUHAMMAD IQBAL	BASHEER AHMAD	DIK	GPS JHOKE JHEDA	04 Sep 1984	05 Dec 2014	119.96	PAROVA	NTS	
		5983191-5 12101-	<del>}</del>	GUL SHER	Dik	GPS WAJHUN	15 Feb 1982	17 May 2014	119.93	PAHARPUR	NTS	
		7337152-1 12103-	MUHAMMAD ASIF		AND SECOND	GPS BILOT SHARIF	06 Sep 1985	17 May 2014	119.89	PAHARPUR	NTS	
		5734305-9	JAVED KHAN	SONA KHAN	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	92( 28)	10 Јал 1988	17 May 2014	119.75	DARABAN	NTS	
		12101- 1764785-7	MUHAMMAD SHOATB	FAIZ MUHAMMAD	DIK	\$1 \$6				KALAN	NTS	
•	32.0	12101- 7534975-9	AURANGZEB	MUHAMMAD SHAFI	25035	GPS BEHARI COLONY	12 Sep 1985	17 May 2014	_		<del></del>	.
. : :	200	12101-	MUHAMMAD SHAKEEL	KHALIL AHMAD	e Oik	GPS SULTANIA	12 Apr 1990	17 May 2014	119.4	7 DIKHAN DARABAN	NTS	
•		5594929-7. 12104-	MUHAMMAD JAMSHED	AMIR MUHAMMAD	DIX	GPS NO. 1 KIRI SHAMOZAI	18 Jan 1988	17 May 2014	119.3	8 KALAN	NTS	
•		2596828-3	In other and a state of the	γι		\$31144024				•		

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44 200 200	2101	MUHAMMAD MATI ULLAH	AHMAD SAEED	100	the state of the s			1. 3	The State of the State of the State of	NIS		
<b>XW</b> 4	5127838-1	3247 4			GPS NO.3 MADDI	7 Apr 1989	7 May 2014	<b>119.23</b>	KULACHI			1
	3432598-3 12103-	100 20 0112111		DE	GPS CHAH LADHA	13 Mar 1986	17 May 2014	119.10	PAHARPUR	NTS		$\dashv$
参	5723200-1	7.11.00.00.00.00.00.00.00.00.00.00.00.00.			GPS NO.2 KULACHI	02 Jul 1985	17 May 2014	119.03	KULACHI	NTS	<u> </u>	4
453/49	12102- 4897404-1	MUHAMMAD IMRAN	SONA KHAN	10.73	GPS NO. 4 DARABAN	15 Dec 1982	17 May 2014	118.86	DARABAŅ KALAN	NTS	<u> </u>	_
236	12102- 1414606-5	NAEEM SHAH	HAKEEM SHAH	10 to 10	KALAN YARIK	09 Nov 1988	17 May 2014	118.83	PAHARPUR	итѕ		
211	12103- 8642875-1	MUHAMMAD RIAZ UR REHMAN	SAHIB JAN	20 O	013 1172121		17 May 2014	118.62	PAHARPUR	NTS		
258	12103- 0254015-9	GHULAM SAMDANI	RAZA MUHAMMAD	) DIK	GPS MADI KHEL	17 Aug 1986	·	118.57	KULACHI	NTS		
	12102-	MUHAMMAD RIAZ	HUSSAIN BAKHSH	DIK-	GMPS G.RABNAWAZ	19 Feb 1984	17 May 2014			NTS	<b>†</b>	
	4302096-3 12103-	MUHAMMAD ALI	RAIS KHAN	OK.	GPS WANDA LALI	09 Jan 1985	17 May 2014	118.30	PAHARPUR			
	5462943-1 12103-	MUHAMMAD IRFAN	GUL BADSHAH	DIK.	GPS WANDA LALI	04 Jan 1991	17 May 2014	118.06	PAHARPUR	NTS		
	8486125-7 12103-	ULLAH	GHULAM HASSAN		GPS NO.1 PAHARPUR	03 Dec 1984	17 May 2014	117.75	PAHARPUR	NTS	<del></del>	
	2043062-1	MUHAMMAD ZEESHAN		Y 144 70 11	GPS NO.1 PAHARPUR	20 Apr 1987	17 May 2014	117.63	PAHARPUR	NTS		
	12103- 8169823-5	AHMAD	AHMAD NAWAZ	5.33	GPS NO.1 ABDUL KHEL	03 Jan 1990	17-May 2014	117.53	PAHARPUR	NTS		
	12101- 3036696-5	RIZWAN ULLAH	SHOUKAT ULLAH	- 1	<u> </u>	03 Mar 1986	17 May 2014	117.24	DARABAN KALAN	NTS		
<b>₹265</b> 70	12104- 8852999-9	MUHAMMAD KAMRAN	MULAZIM HUSSAIN	100	GPS MOCHIWAL GPS NO. 1 KOT	<del></del>	17 May 2014	117.20	DARABAN	NTS		
	12102-	ZAKAULLAH KHAN	ATTA ULLAH KHAN	DK.	SHAHNAWAZ	30 Apr 1985			DIKHAN	NTS		
	1611179-5 12101-	HAJI DILAWAR KHAN	HAJI MIRZA KHAN	DIK	GPS КНОТТІ	24 Apr 1989	17 May 2014		_	NTS		
	第7896018-1 日2102-	HAIBAT KHAN	MUHAMMAD AMEER KHAN	Dik	GPS NO.1 KULACHI	11 Feb 1982	17 May 2014	116.83				
44208	\$5672976-7 \$ 12103-		GHULAM RASOOL	DIK	GPS KACHA MALI KHEL	30 Oct 1988	17 May 2014	116.82	PAHARPUR	NTS		_
269	0244340-7	MUHAMMAD JABBAR		30.5	GPS NO.1 ABDUL KHEL	15 Mar 1984	17 May 2014	116.8	PAHARPUR	NTS		_
2703	12103- 4018813-1	GUL NAWAZ	MUSA KHAN			16 Feb 1983	17 May 2014	1 116.7	KULACHI	NTS		
1071	第12102- 第2134578-7	TAHIR KHAYYAM	TAUS KHAN	DIK		02 Jan 1992	17 May 201	4 116.4	9 DIKHAN	NTS		_
	12101 <i>-</i> 3958240-7	ABDUL BASAT	MAULVI GHULAM HASSAN		GPS KOT ESSA KHAN		17 May 201		0 PAROVA	NTS	• .	
273	12101-	MUSHTAQ AHMAD	лимма кнай	DI	GPS KHANA SHARIF	02 Jan 1980		-		NTS		
	0924424-5 12101-	MUHAMAMD RAMZAN	SHER ZAMAN	DI	GPS GARA MORE	05 Mar 1981	17 May 201	4 116.3	DIKTON			
展布外	第17034423-1				<b>A</b>							

	interpolation de la company	and a second control of the second second				4.03					
	MUHAMMAD ZUBAIR	ABDUL SATTAR KHAN	Sec	GPS WANDA UMARI		17 May 2014 &			NTS. STATE OF THE		4
67992 12103	MUHAMMAD YOUNAS	GANMON	DIK	GPS NO I UMRAY WALI	03 Mar 1987	17 May 2014		PAHARPUR	NTS	<u> </u>	4
82713 12103	TAHIR KHAN	HAJI NADIR KHAN	DIK	GPS NO.1 PAHARPUR	25 Mar 1992	17 May 2014	116.13	PAHARPUR	NTS		4
69405	74-7	MUHAMMAD HANIF	ZOIK	GPS JK/ QURESHIAN	23 Mar 1987	17 May 2014.	115.87	DIKHAN	NTS		_
532787 55832 1210	56-9 SANA ULLAH	1.	3(42)	GPS WANDA HAIBATTI	04 Feb 1988	17 May 2014	115.70	DIKHAN	NTS		
82890	65-1 ASIF OLLAN	GHULAM JAN .		AGDS HIGHE TABLELL	26 May 1983	17 May 2014	115.55	PAROVA	NTS		
21280 21280 20924		SARDAR BAKHSH	ODIK.	NO.02			<del> </del> -	DIKHAN	NTS		
5) 281 1210 7341	IMUHAMMAD I ASEEN	MUHAMMAD AMIN	LOIK	GPS NO.10 DIK	20 Sep 1972	17 May 2014	115.49		,	<u> </u>	-
1210	SHOUK AT ULLAH	GHULAM MUHAMMAD	DIK	GPS UDWAL	07 Apr 1990	17 May 2014	115.46	PAHARPUR	NTS .	<del> </del>	
3921 1210		ABDUL MAJID	DIK.	GPS BASTI DIRKHAN	15 Apr 1985	05 Dec 2014	115.36	DIKHAN	NTS	<u> </u>	
6829	025-5		DIK	GPS BHITANIAN	01 Nov 1984	05 Dec 2014	115.08	PAHARPUR	NTS		
7312	3.			GPS NO.3 MADDI	20 Jan 1988	17 May 2014	115.05	KULACHI	NTS		
9927	407-1 MORAMMAD KIALID	ABDUL MAJEED	40 TO 4		31 Dec 1987	17 May 2014	115.02	PAHARPUR	NTS		
1210 1413	3- 344-3 SHEIKH JAWAD AHMAD	SHAIKH RIAZ AHMAD	OK	<u></u>	<del> </del>	<del>                                     </del>	114.89	PAHARPUR	NTS		_
1210 9151	3- 950-7 MUHAMMAD ARIF	GHULAM HUSSAIN	DIK	GPS BILOT SHARIF	20 Mar 1983	17 May 2014	<del> </del>	<del></del>	NTS		_
1210		RAB NAWAZ	DIK	GPS TOBA	01 Apr 1992	17 May 2014	114.56	PAHARPUR	<del></del>	1	
318 1210	1- MUHAMMAD ZAFRAN	HIDAYAT ULLAH SHAKIR	TO K	GPS NO. 11 DIKHAN	15 May 1989	17 May 2014	114.52	DIKHAN	NTS		
3224 1210	864-1	MAKHAN KHAN	, EDIK	GPS NO. 2 HAJI MORA	20 Mar 1979	05 Dec 2014	114.47	DIKHAN	NTS	<u> </u>	
091	691-1			GPS DARABAN KHURD	01 Oct 1986	17 May 2014	114.42	PAROVA	NTS	,	
040	535-9 KHAN	SANWAL KHAN	_	Projection	17 Apr 1986	17 May 2014	114.40	DIKHAN	NTS		
292 1210 767	01- 1606-1 ASMAT ULLAH	KHUDA BAKHSH		GPS KOTLA SAIDAN	<del></del>	<del></del>	<del> </del>	DIKHAN	NTS		
2013 322	OI- B351-9 AZIZ ULLAH	ALLAH WASAYA	Dik	GPS HISSAM	30 Apr 1986	17 May 2014	114.25				
1210	01- MUHAMMAD BILAL	MALIK SOOBA	i di	GAGPS RANGPUR JANUBI	12 Dec 1981	17 May 2014	114.20	PAROVA	NTS	+	نعيت.
305 121	5908-3	MUHAMMAD KHAN	₹DII	GPS NO. 1 DHALLAH	01 <sub>.</sub> Jan 1978	25 Fcb 2017	114.15	PAHARPUR	NTS		
150	2759-7	GHULAM MUSTAFA	n Di	GPS NO.1 RORRI	05 Oct 1990	17 May 2014	114.06	KULACHI	NTS		
466	2592-1 MUHAMMAD TARIQ	GHULAM MOSTALA	1001	GPS KURAL	18 Apr 1983	05 Dec 2014	113.84	DIKHAN	NTS		
7297.7.719	1837-1 SHAHID	AMANULLAH		A STATE OF THE STA							

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12102-		YAOUB SHAH	DIK	GPS FATEH ALI	27 Apr 1984	05 May 2017	100 67 !	DARABAN KALAN	NIS	
117166 1010340-2	Jan William Control				26 May 1990	05 May 2017	107.37	KULACHI	NTS	
4208009-7		TUMMA KHAN			30 Apr 1993	05 May 2017	107.33	PAROVA	NTS	
0352676-5	5,24,, 052,0	QUDRAT ULLAH		015 0/20112	27 Feb 1991	05 May 2017	106.92	PAHARPUR	nts	
12103- 1174 2822984-7	MUHAMMAD TARIQ KHAN			013120116.22	03 Mar 1996	05 May 2017	106.40	DIKHAN	NTS	
12102- 5400765-7	SHAH ZAIB KHAN	JALIL AHMAD KHAN		013 01201212121		05 May 2017		PAHARPUR	NTS	
12103- 1176-11742358-1	KIFAYATULLAH KHAN	ABDULLAH JAN		010 1120 1120	03 Feb 1987			KULACHI	NTS	
12102- 1276 8289497-5	SIRAJ UD DIN	ZAHOOR US DIN	PK	GPS GARA MOHABBAT	29 May 1992	27 Sep 2017	106.11			-
12101- 14178 8060378-1	ALI ASGHAR	KARIM KHAN	DIK	GPS WANDA HAIBATTI	01 Jan 1989	05 May 2017	105.68	DIKHAN	NTS	
12103- 1179 2610033-3	MUIHAMMAD FAROOQ	AALAM KHAN	фĸ	GPS UMER KHEL	02 Mar 1992	27 Sep 2017	103.67	PAHARPUR	NTS	
12101-	SYED FARMAN ALI SHAH	SYED SHARAF HUSSAIN SI	AH DIK	GPS KOKAR GHARBI	03 Jan 1996	05 May 2017	102.23	DIKHAN	NTS	
3779757-5 12101-	MUHAMMAD WAQAR	RUSTAM KHAN	2DIK	GPS KOKAR GHARBI	11 Dec 1996	05 May 2017	102.23	DIKHAN	NTS	<del> </del>
2538/43-3 12101-	KHAN ABDUL RAUF	MUHAMMAD AZIM		GPS NO. 2 POTA	26 Nov 1991	05 May 2017	101.65	DIKHAN	NTS	
2782462-5 12102-	MUHAMMAD RAFIQ	ALLAH DAD		GPS KOT ATAL SHARIF	25 Dec 1990	05 May 2017	101.51	KULACHI	RTS	
36047043-1 12103-	KHALID AZIZ	AHMAD NAWAZ	DIK	GPS KACHI KATH GARH	02 Feb 1986	05 May 2017	100.96	PAHARPUR	NTS	
4624642-1 12101-	MUHAMMAD IKRAM	HAFIZ NAIMAT ULLAH	, OK	GPS JEEWAYA SAHI	15 Sep 1992	05 May 2017	100.18	DIKHAN	NTS	
0839585-5	ULLAH	MUHAMMAD KHAN	DIK	GPS MIALI	10 Jun 1982	05 May 2017	100.05	PAROVA	игз	
0935010-3 12101-	MUHAMMAD IQBAL		70700	GPS KOKAR SHARQI	11 Sep 1996	05 May 2017	97.95	DIKHAN	NTS	
5668286-1	MUHAMMAD ZEESHAN	GHULAM BAKIR		GPS SHERU KOHNA	29 Dec 1992	05 May 2017	96.31	DIKHAN	NTS	
12101- 1188 1690406-1	FARID ULLAH	AZIZ ULLAH		GPS ZAFFAR ABAD	1	05 May 2017	96.02	DIKHAN	NTS	
1189# 1189# 0982330-5	KHALIL AHMAD	GHULAM RASOOL	S DIK	COLONY	12 Dec 1981		<del> </del>		итs	<del></del>
12101- 1190- 0313868-3	MUHAMMAD KHALID	MUHAMMAD AKBAR	DIK	GPS SHERU KOHNA	14 May 1990	05 May 2017	95.62	DIKHAN		
12101- 110 0755069-3	MUHAMMAD TARIQ BILAI	ABDUL WAHEED		GPS DARRABRI	11 Apr 1984	05 May 2017	95.35	DIKHAN DARABAN	NTS	
12104- 11192-7 4482259-7	MUHAMMAD KHALIL	ABDUL RASHEED	DIK.	GPMS KOTHA DARKHAN	20 Aug 1989	05 May 2017	93.28	KALAN	NTS	_
12105-	SABIR SHAH	KHAIR SHAH	DIK	GPS POTA DADANZAI	06 Feb 1986	05 May 2017	93.02	DARABAN KALAN	NTS	
0360545-3		6	Profession -	- 46-						

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0.3110/04/1	12101-	RISHI HANS	HEERA LAL	ĎΚ	GPS NAI ABADI KOTLA SAIDAN	12 Jul 1996	05 May 2017	90.48	DIKHAN	NTS	
	8047233-5 12101-	SHAFQAT ULLAH	MUHAMMAD AMEEN			13 Aug 1988	27 Sep 2017	90.37	DIKHAN	NTS	• !
	7464937-1 12101-	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	DK X	013741111 01241	02 Feb 1977	22 Feb 2018		PAHARPUR	DECEASED SON / MEDICAL BOARD QUOTA	
12-21 10 552-3	12101- 7976492-5	MUHAMMAD SOHAIL	GHULAM FARID	No.		05 Mar 1980	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
N-21 1004-Y	12101- 9408976-3	- KHURAM SHEHZAD	MUHAMMAD IBRAHIM	ĎK	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- 8202352-1 12101- 0808292-3	AFTAB MOHAY UD DIN	MOHAMMAD ASLAM	DK	GPS SHEIKH RAJU	02 Apr 1985	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	·
	12101- 5595268-1	MUHAMMAD ALI NUMAIR	SYED JAHANGIR ABBAS		G.P.S WANDA BALOCH KOKAR	21 Mar 1992	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
	12102- 5739990-3	IRFANULLAH	FATEH ULLAH	, OK	GPS NO.2 KOT ESA KHAN	04 Oct 1993	22 Feb 2018		CHODWAN	DECEASED SON / MEDICAL BOARD QUOTA	
	12101-	ALI JAMSHED	JAMSHED AHMAD	1.00	G.P.S SHAIKH YOUSAF	13 Feb 1994	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
EXX 7/142.34	5310377-9	ALI JAMSHED	JAMSHEO AHMAD		50.1.3 311Aki1 1003/2			<u> </u>		BOAKD QUOTA	

CHAIRMAN: MUHAMMAD SHAFIQ

MEMBER 1: ASIM SAEED

MEMBER 2: MUHAMMAD DANISH ROOMAN

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