

28.07.2022

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

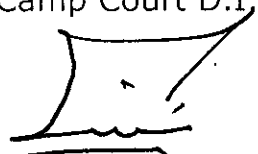
  
Reader

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.11 to 90.

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. 11 to 90 for submission of reply/comments through registered post. Adjourned. To come up for submission of reply/comments on behalf of private respondents No. 11 to 90 on 25.10.2022 before the S.B at Camp Court D.I.Khan.

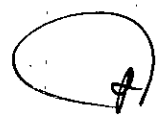
  
(Salah-Ud-Din)  
Member (J)  
Camp Court D.I.Khan

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

25.03.2022

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

  
Reader

29.03.2022

Counsel for the appellant present and heard.

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




Chairman  
Camp Court, D.I.Khan.


24.05.2022

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

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

  
Appellant Deposited  
Security & Process Fee

3/6

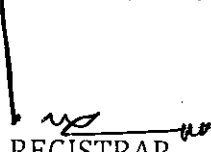

  
(Salah-Ud-Din)  
Member (J)  
Camp Court D.I.Khan

Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 7520 /2021

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

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: Mazhar Iqbal VS Govt of KPK cte

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

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

Name: M. Anwar Awan ASE

Signature: [Signature]  
Dated: 03/08/2021

The appeal presented by Mr. Sana Ullah Shamim Gandapur Advocate today i.e. on 15.07.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

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

No. 1376 /S.T.

DR. 19/07 /2021

  
REGISTRAR

SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

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

Reference your reply submitted in response to our observation, it is reiterated that the objections/observations rose by this office at serial no. 3, 4, 12 and 14 have not been removed and still stands. Therefore, the appeal in hand is returned for removing the above mentioned observations and resubmission with 15 days.

No. \_\_\_\_\_/S.T,

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

REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

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

R/s

The objections are rectified.

Inwan  
Adv

BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR

Service Appeal No 7520/2021 /2021

MAZHAR IQBAL VERSUS GOVT OF K.P.K etc.

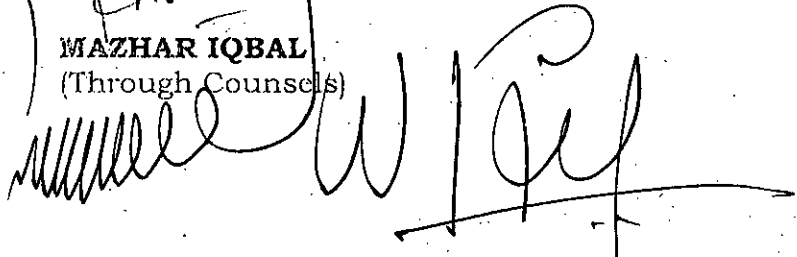
INDEX

S.NO	Particulars	Annexure	Page No
1.	Grounds of Appeal along with affidavit	---	1-5
2.	Copy of the Petitioner appointment order	A	6-11
3.	Copy of regularization order dated 10.03.2018	B	12-13
4.	Copies of office order dated 04.06.2020 and office order dated 24.06.2020 and Seniority list	C,D&E	14-17
5.	Copies of objection/reservation and its reply.	F&G	18-24
6.	Departmental applications/appeals	H	25-28
7.	Wakalatnamas		29

YOURS HUMBLE APPELLANT

Dated: /06/2021

  
MAZHAR IQBAL  
(Through Counsels)

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

KANEEZ BATOOL  
Advocate High Court D.I.Khan

BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR

Service Appeal No 7520 /2021

MAZHAR IQBAL PST GPS NO. 2 POTA.

(Appellant)

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 7313

Dated 15/7/2021

VERSUS

1. GOVERNMENT OF KHYBER PAKHTUNKHAWA THROUGH CHIEF SECRETARY, CIVIL SECRETARIAT, PESHAWAR
2. THE SECRETARY ELEMENTARY & SECONDARY EDUCATION, KHYBER PAKHTUNKHAWA, PESHAWAR.
3. DIRECTOR ELEMENTARY & SECONDARY EDUCATION, KHYBER PAKHTUNKHAWA, PESHAWAR.
4. ASSISTANT DIRECTOR (Estb.) ELEMENTARY & SECONDARY EDUCATION, KHYBER PAKHTUNKHAWA, PESHAWAR.
5. DISTRICT EDUCATION OFFICER (DEO) MALE, D.I.KHAN.

M. ANWAR ANWAR  
Advocate Supreme Court  
D.I.KHAN

Anwar Ad

Filed to-day

- Registration
06. AQAL KHAN GPS NO.1 REHMANIKHEL DISTT: D.I.KHAN
  07. ZIA UR REHMAN GPS NO.1 REHMANIKHEL DISTT: D.I.KHAN
  08. HIZBULLAH KHAN GPS NO.1 TAKWARA DISTT: D.I.KHAN
  09. MUHIB HUSSAIN SHAH GPS NO. 2 DHALLAH DISTT: D.I.KHAN
  10. ASSAD HUSSAIN SHAH GPS WANDA TALGI DISTT: D.I.KHAN
  11. ABDUR RAUF KHAN GPS KOT MASOODAN DISTT: D.I.KHAN
  12. MUHAMMAD ZAFFAR GPS MANDHRA SAIDAN DISTT: D.I.KHAN



**SERVICE APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT 1974 TO DIRECT THE RESPONDENTS 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.**

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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 in the impugned seniority list the Respondent No. 07 to 80 which are juniors to the Appellant are placed earlier/Seniors and given senior portion in the impugned seniority list but the Appellant even being senior is placed on junior portion in the said seniority list.
5. That as per general criteria for promotion in the education department / being civil servant is to consider the service length from the date of

initial appointment of the employee /promote which is quite absent in the impugned seniority list.

6. That on 08-01-2021 the appellant along with others submitted their objection/reservations on the impugned seniority list prepared by the department to the competent authority and the same was replied/rejected on 09-02-2021. Copies of objection/ reservations and its reply are Annexure F & G.
7. That 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 H.
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.

*Answer*

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

OR

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

YOUR HUMBLE APPELLANT

DATED: /06/2021

  
MAZHAR IQBAL  
(Through Counsel)

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

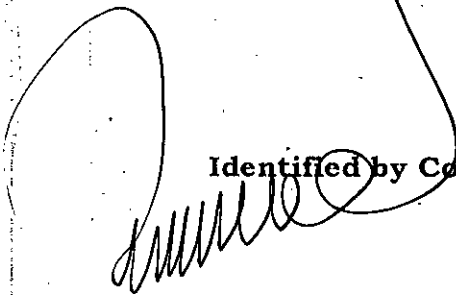
KANEEZ BATOOL  
Advocate High Court D.I.Khan

**AFFIDAVITE**

I, MAZHAR IQBAL PST GPS NO. 2 POTA. The Appellant, do hereby solemnly affirm and declare on oath that all the contents of the Appeal are true and correct to the best of my knowledge and belief and noting has been deliberately concealed from this Honorable Court.

  
Deponent

Identified by Counsel:

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



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

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

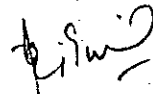
**MAZHAR IQBAL VERSUS GOVT OF K.P.K etc.**

**BOOKS REFERED:**

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

**VERIFICATION; / CERTIFICATE.**

I, **MAZHAR IQBAL**, 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.



**MAZHAR IQBAL**

- A -

Appointment Orders PST (Male) District D.I.Khan



**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:-

S.No	Roll No	NAME	FATHER'S NAME	CNIC	SCORE	PLACE OF POSTING	UNION COUNCIL
<b>DERA ISMAIL KHAN</b>							
1.	1760062	MUHAMMAD SHAHID	QAYYUM NAWAZ	12101-6286930-3	93.5	GPS DARWESHA	CHEHKAN
2.	1760177	BASHIR AHMAD	MUHAMMAD AFZAL	12101-8038430-1	97.19	GPS GARA BALA	CHEHKAN
3.	1760752	NAVEED AHMAD	NAZIR AHMD	12101-2041550-9	109.58	GPS GARA HASSANI	CHEHKAN
4.	1760368	MUHAMMAD RAMZAN	SHER ZAMAN	12101-7034423-1	116.35	GPS GARA AJORE	CHEHKAN
5.	1760733	RAHMAT ULLAH	SARFARAZ	12101-5709320-3	95.33	GPS HAINDAN	CHEHKAN
6.	1760335	MAZHAR IQBAL	MUHAMMAD IQBAL	12101-4536514-5	87.57	GPS JANDI SINDHI	CHEHKAN
7.	1761263	MUHAMMAD ABBAS	MUHAMMAD RAMZAN	12101-1989179-5	109.62	GPS JEVAYA SAHI	CHEHKAN
8.	1760735	MUHAMMAD SALEEM	KARIM BAKHSH	12101-0972120-3	117.46	GPS NO. 2 POTA	CHEHKAN
9.	1762690	MUHAMMAD NADEEM AKHTAR	MUHAMMAD ASLAM	12101-3818810-5	87.92	GPS NO. 2 POTA	CHEHKAN
10.	1761200	RAB NAWAZ	GUL SHER	12101-7539649-3	95.9	GPS NURANG UTRA	CHEHKAN
11.	1761043	ABDUL BASAT	MAULVI GHULAM HASSAN	12101-3958240-7	116.49	GPS SHERU KOHNA	CHEHKAN
12.	1760108	SANA ULLAH	GHULAM QADIR	12101-9636197-3	88.45	GPS SIKANDAR SHUMALI	CHEHKAN
13.	1766832	SHAHZADA MUHIB ULLAH	MUHAMMAD ASLAM	12101-3837795-9	92.31	GPS SIWAG	CHEHKAN
14.	1760603	MUHAMMAD ALTAJ KHAN	UMAR HAYAT KHAN	12101-7309163-5	98.29	GPS TAI	CHEHKAN

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

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

### TERMS & CONDITIONS

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

8

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

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

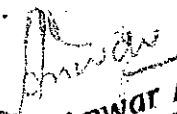
Endst No. 7135-7765 /PST(M) NTS

Dated DIKkhan the 17-05-2014

Copy forwarded for information and necessary action to:

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

  
District Education Officer (M)  
DIKHAN

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



(13)

Appointment Orders PST (Male) 2<sup>nd</sup> Phase, Adhoc, D.I. Khan

Amendure 4

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

+ Resps  
9

APPOINTMENT.

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

Roll No.	Name	Father Name	D.O.B.	CMC	Medi Position	Place of Posting	Dist. Office
1	1760493 RAHMAT ULLAH	MUHAMMAD AMIR	06/06/1984	12101-8224382-1	37.89	GPS CHEKKAN	CHEKKAN
2	1750921 HAFIZ MOHAMMAD TAHIR RASHID	ABDUR RASHID KHAN	01/08/1983	12101-4667199-9	168.25	GPS GARA AHMAD	CHEKKAN
3	1760332 ASIF MAWAZ	ALAM MAWAZ	01/04/1994	12101-9701491-3	55.22	GPS GARA DAD	CHEKKAN
4	176223 MUHAMMAD BILAL	ABDUL SATTAR	87	12101-7201479-7	101.67	GPS GARA MURCHI	CHEKKAN
5	176824 MUHAMMAD VASIR KHAN	ASDUS SALAM	03/01/1986	12101-4129138-3	95.95	GPS NO. 1 POTA	CHEKKAN
6	176027 FARSEEN ULLAH	FAZAL AHMAD	14/03/1992	12101-5027815-3	54.21	GPS SHEHU KONDA	CHEKKAN
7	1763358 KHADIM RASOOL	SAID RASOOL	14/01/1973	12101-3907180-9	84.82	GPS SHEHU RAU	CHEKKAN
8	1764000 MUHAMMAD GAFI MUBDASIR	HAFIZ ILAH BAKHSH	05/05/1988	12101-5713694-9	95.46	GPS ASHA MASJID	DD=2
9	176649 NAJAM ALI	AASHIQ HUSSAIN SHAH	07/04/1981	12101-0919404-9	108.59	GPS GHAT SARWAR	DD=2
10	1762861 NAVEED AHMED	ABDUL MAJEED	12/04/1985	12101-6529025-5	115.36	GPS BAST DIRKMAN	DD=2
11	1764245 NAJIBULLAH KHAN	HABIBULLAH KHAN	17/05/1984	12101-0657233-9	105.63	GPS GHAT BAREY VALA	DD=1
12	1762898 MALIK MUHAMMAD ALTAJ	MUHAMMAD MAWAZ	15/05/1979	12101-6092255-5	83.83	GPS KASSA	DD=2
13	1760880 ISHTIAQ AHMED	SUFI GHULAM HASSAN	23/03/1976	12101-9150160-1	103.22	GPS KACHH PAIND KHAF	DD=2
14	1760472 MUHAMMAD TARIQ	MUHAMMAD RAMZAN	24/03/1978	12101-0256478-3	100.98	GPS NO. 2 THOYA FAZIL	DD=2
15	1760473 IHSANULLAH	GHULAM RAESAN	22/11/1988	12101-1529760-3	58.57	GPS NO. 2 THOYA FAZIL	DD=2
16	1761633 SAZAD SHAH	MUHAMMAD IGHALE UMAR	20/03/1984	12101-3635944-9	89.50	GPS TAJIM ABAD	DD=2
17	1764532 NADEEM KHAN	ABDUR REHMAN	01/07/1973	12101-0913331-7	107.87	GPS MAD ALLI SHAH	DEWANA
18	1761605 MUHAMMAD NASR KHAN	SHAH MAWAZ KHAN	04/02/1981	12101-0375295-1	100.57	GPS POLICE LINE	DEWANA
A	1766602 IHSANULLAH	KAMRAN	11/06/1976	35202-3244-76-7	121.6	GPS BULADASI	GILGIT
W	1763950 USMAN ALI	HAZIR AHMAD	04/02/1985	12101-5721382-0	105.91	GPS NO. 1 GILGIT	GILGIT

M. ANWAR AWAN  
District Education Officer

Accepted

S.No.	Roll No.	Name	Father Name	D.O.B.	CNIC	Merit Position	Place of Posting	Union Coun
215.	1764226	MUHAMMAD WASEEM SATTAR	ABDUL SATTAR JASKANI	15/04/1987	32103-717202-1	87.69	GPS NO. 3 RAMAK	MIRAN
216.	1760464	ABDUL SATTAR	ZAWAR HUSSAIN	10/03/1987	12101-9200938-5	87.39	GPS GARA TAHIR	NAIVELA
217.	1760798	ALAMGIR	IMAM BAKHSH	25/10/1980	12101-1258640-5	100.53	GPS KOTAH BALOCHAN	NAIVELA
218.	1763999	INTIZAR HUSSAIN	MUKHTIAR HUSSAIN	25/12/1991	12101-5753979-5	83.96	GPS NAIVELLA	NAIVELA
219.	1760645	MUHAMMAD ISHAQ KHAN	AMAN ULLAH KHAN	01/03/1981	12101-0992030-7	83.62	GPS DHANDLA	PAROA
220.	1762589	WASI UL QUDDOS	HAJI ABDUL QUDDOS -	24/04/1978	12101-0989303-3	94.11	GPS LADHU KARLU	PAROA

### TERMS & CONDITIONS

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

Attested  
 M. Ashraf Awan

M. Ashraf Awan  
 Additional Deputy Commissioner

11

Appointment Orders PST (Male) 2<sup>nd</sup> Phase, Adhoc. DIKhan

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.
16. Copy of professional standards, core competencies and job description for PST (Annex-A) issued vide Govt. of Khyber Pakhtunkhwa, E&SED Notification No. SO (PE) 4-3/PST/2014 dated 17.09.2014 is attached with the appointment order.

34

Muhammad Riaz Swati  
District Education Officer (M)  
Dera Ismail Khan

Order No. 23048-23274/PST(NYS) Dated DIKhan the 05/12 2014

Copy forwarded for information and necessary action to:

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

Attested

M. Anwar Awan  
Advocate Supreme Court  
DIKhan

District Education Officer (M)  
Dera Ismail Khan

(B)

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

(17)

**NOTIFICATION:**

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

Sr	RollNo	Name	Total Marks (out of 200)	School	UC	Appointment order No and dated	Extension order No and dated if any	CNIC
1	1760002	MUHAMMAD SHAHID	93.5	GPS DARWESHA	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-6286930-3
2	1760477	BASHIR AHMAD	97.19	GPS GARA BALA	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-8038430-1
3	1760752	NAVEED AHMAD	109.58	GPS GARA HASSANI	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-2041550-9
4	1760368	MUHAMMAD RAMZAN	116.35	GPS GARA MORE	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-7034423-1
5	1760733	RAHMAT ULLAH	95.33	GPS HAINDAN	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-5709320-3
6	1760335	MAZHAR IQBAL	87.57	GPS JANDI SINDH	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-4536514-5
7	1762690	MUHAMMAD NADEEM AKHTAR	87.92	GPS NO. 2 POTA	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-3818810-5
8	1764200	RAB NAWAZ	95.9	GPS NURANG UTRA	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-7539649-3
9	1764043	ABDUL BASAT	116.49	GPS SHERU KOHNA	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-3958240-7
10	1760108	SANA ULLAH	88.45	GPS SIKANDAR SHUMALI	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-9636197-3
11	1760822	SHAHZADA MUHIB ULLAH	92.31	GPS SIWAG	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-3837795-9
12	1760603	MUHAMMAD ALTAF KHAN	98.29	GPS TAJ	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-7309163-5
13	1762586	MATI ULLAH	112.95	GPS BASTI DIRKHAN	DD# 1	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-8937011-7
14	1763381	MUHAMMAD JAVED KHAN	98.86	GPS CHAH BAREY WALA	DD# 1	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-5971143-9
15	1760005	MUHAMMAD YOUNIS	127.49	GPS KACHI PAIND KHAN	DD#2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-3032309-7
16	1763031	MUHAMMAD WAQAR AHMAD	112.77	GPS NO. 1 THOYA FAZIL	DD#2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-7810587-1
17	1760365	MALIK UMAIR YASIN	107.28	GPS NO. 1 THOYA FAZIL	DD#2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-4061211-7
18	1760921	AFNAN KHAN	103.37	GPS NO. 1 THOYA FAZIL	DD#2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0217588-7
19	1760280	AZMAT ULLAH	101.43	GPS NO. 2 THOYA FAZIL	DD#2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0953316-5
20	1760338	SAMI ULLAH KHAN	91.13	GPS NO. 2 THOYA FAZIL	DD#2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-7097201-5
21	1760755	MALIK MUHAMMAD IRFAN	88.19	GPS TAHIM ABAD	DD#2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-8201696-9
22	1760835	MUHAMMAD HASHIM	102.24	GPS BASTI DHAPPAN WALI	Deewala	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0936562-1
23	1760648	MUHAMMAD ILYAS	107.04	GPS CHAH MALIK WALA	Deewala	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-7076340-5
24	1760028	MUHAMMAD EHSAN	105.62	GPS CHAH MALIK WALA	Deewala	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-0940626-9
25	1760808	ZUBAIR AHMAD	103.41	GPS MADNI TOWN	Deewala	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101-3119854-5

gm

**MINORITY QUOTA**

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

**TERMS & CONDITIONS**

1. 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.
2. 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.
4. 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.
5. 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 any other ground before commencement of this ACT. The DDO concerned should ensure this condition before the drawl of their pay as regular servants.
8. Their regularization shall not affect the promotion quota of existing holders of posts in respective service cadres.
9. 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.

Sd/-  
**(ATTA ULLAH KHAN MINA KHEL)**  
**DISTRICT EDUCATION OFFICER**  
**(MALE) DERA ISMAI KHAN**

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

Dated DIKhan the 10/03 2018

Copy forwarded for information and necessary action to the:-

1. PS to the Secretary, to Govt: Khyber Pakhtunkhwa E&SE Department.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. District Nazim DIKhan.
4. Deputy Commissioner DIKhan.
5. District Comptroller of Accounts DIKhan.
6. Deputy District Education Officer (Male) DIKhan.
7. All Sub Divisional Education Officers (M) in District DIKhan.
8. All Assistant Sub Divisional Education Officers (M) Circles in District DIKhan.
9. All Head Teachers Concerned.
10. Teachers Concerned.
11. Master File.



**DISTRICT EDUCATION OFFICER**  
**(MALE) DERA ISMAI KHAN**

M. Anwar Awari  
 Advocate Supreme Court  
 DIKhan



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

- 14 -

Endst: No. 11728/1

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

To

The Director  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar

Subject: GUIDANCE REGARDING SENIORITY LIST OF PST

Respected Sir,

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

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

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

  
DISTRICT EDUCATION OFFICER  
(MALE) DERA ISMAIL KHAN

Endst: No. 11729-331

Dated: 04/06/2020

Copy for information to the:-

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

M. Anwar Awan  
Advocate Supreme Court  
Dera Ismail Khan

  
DISTRICT EDUCATION OFFICER  
(MALE) DERA ISMAIL KHAN

- D -

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(88)

~~Amir Khan~~ 4/10 (4)



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

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

To:

The District Education Officer (M)  
D I Khan.

Subject: **GUIDANCE REGARDING SENIORITY LIST OF PST.**

Memo:-

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

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

Copy forwarded to the:-

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

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

*Anwar*  
**M. Anwar Awan**  
Advocate Supreme Court  
D.I. Anan

16

**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.

SERIAL NO.	CNIC	NAME	FATHER NAME	DOMICILE	PRESENT PLACE OF POSTING	DATE OF BIRTH	DATE OF TAKING CHARGE	SCORE	TEHSIL	METHOD OF APPOINTMENT	REMARKS
	12101-8104636-5	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	
	12103-1490966-3	MUSHTAQ AHMAD	RAB NAWAZ	DIK	GPS MITHA PUR KALAN	10 Apr 1962	16 Dec 1982		PAHARPUR	DIRECT APPOINTMENT	
	12103-1482132-1	ALLAH NAWAZ	MUHAMMAD NAWAZ	DIK	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	
	12101-0961741-7	ASEEM KHAN	AZAM KHAN	DIK	GPS GILOTT	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	
	12102-2150050-7	ABDUL SAMAD KHAN	ABDUL GHAFAR	DIK	GPS BASTI BALOCHAN	28 Apr 1961	17 Oct 1984		DARABAN KALAN	DIRECT APPOINTMENT	
	12101-0939011-5	ABDUL RASHID	IMAM BAKHSH	DIK	GMPS HAZARA PAKKA	15 Oct 1963	17 Oct 1984		PAROVA	DIRECT APPOINTMENT	
	12103-1501762-9	MUHAMMAD ABBAS SHAH	ABDUL HUSSAIN SHAH	DIK	GPS SAID ALIYAN	15 Apr 1965	17 Oct 1984		PAHARPUR	DIRECT APPOINTMENT	

M. ATWAT AMIR  
Advocate Supreme Court  
D.I.Khan

E



(17)

780	12104-4668439-5	SAHIB KHAN	ABDUL SAMAD	DIK	GPS GURWALI	02 Mar 1991	17 May 2014	88.37	DARABAN KALAN	NTS	
781	12101-0413474-5	GHULAM ABBAS	MUHAMMAD ASLAM KHAN	DIK	GPS BABBAR PAKKA	16 Dec 1984	17 May 2014	88.23	PAROVA	NTS	
782	12101-8201696-9	MALIK MUHAMMAD IRFAN	MALIK ALLAH BAKHSH	DIK	GPS SHAHIM ABAD	01 Apr 1988	17 May 2014	88.19	DIKHAN	NTS	
783	12101-3818810-5	MUHAMMAD NADEEM AKHTAR	MUHAMMAD ASLAM	DIK	GPS NO. 2 POTA	15 Oct 1987	17 May 2014	87.92	DIKHAN	NTS	
784	12101-4608343-7	MUHAMMAD IMRAN	FAZAL REHMAN	DIK	GPS DIN PUR	14 Mar 1990	05 Dec 2014	87.86	DIKHAN	NTS	
785	12101-2526976-1	MUHAMMAD SHAFQAT	ABDUL AZIZ	DIK	GPS BHIRKI	15 Feb 1980	17 May 2014	87.77	PAROVA	NTS	
786	32103-7171202-1	MUHAMMAD WASEEM SATTAR	ABDUL SATTAR KHAN	DIK	GPS SHERQI ABADI RAMAK	15 Apr 1987	05 Dec 2014	87.69	PAROVA	NTS	
787	12101-5574067-1	MUHAMMAD IRFAN	MUHAMMAD RAMZAN	DIK	GPS JHÖKE OBHAYA	11 Oct 1994	17 May 2014	87.59	PAROVA	NTS	
788	12101-4536514-5	MAZHAR IQBAL	MUHAMMAD IQBAL	DIK	GPS NO. 2 POTA	18 Apr 1987	17 May 2014	87.57	DIKHAN	NTS	
789	12101-0734623-3	FARMAN ULLAH	GHULAM MUHAMMAD	DIK	GPS WANDA KOTRIAN	23 Jan 1991	17 May 2014	87.53	PAHARPUR	NTS	
790	12101-9200938-5	ABDUL SATTAR	ZAWAR HUSSAIN	DIK	GPS GARA TAHIR KHAN	10 Mar 1987	05 Dec 2014	87.39	PAROVA	NTS	
791	12101-2733497-1	MUHAMMAD TARIQ	MUHAMMAD HASHIM	DIK	GPS DIN PUR	12 Jan 1988	05 Dec 2014	87.39	DIKHAN	NTS	
792	12101-5735339-1	NIZAM UD DIN	SHAH NAWAZ	DIK	GPS MUR YALI	01 Apr 1988	17 May 2014	87.25	DIKHAN	NTS	
793	12101-0966954-3	IFTIKHAR AHMAD	NIAZ MUHAMMAD	DIK	GPS BORING MEHMD	15 Mar 1982	17 May 2014	87.22	DIKHAN	NTS	
794	12101-8428217-3	MUHAMMAD IQBAL	HUSSAIN BAKHSH	DIK	GPS BALI SHUMALI	11 Apr 1987	17 May 2014	87.20	DIKHAN	NTS	
795	12102-2135278-5	MUHAMMAD YOUNIS	GHULAM MUHAMAD	DIK	GPS GARA MEHMMOOD	01 Feb 1981	17 May 2014	87.18	DARABAN KALAN	NTS	
796	12101-3951579-9	SHAFIQUR REHMAN	SUBEDAR	DIK	GPS TEEKIN	01 Mar 1985	17 May 2014	87.13	DIKHAN	NTS	
797	12104-6988877-5	SAJID AKHTER	GHULAM QASIM	DIK	GPS GARA ALAM KHAN	02 May 1987	17 May 2014	87.13	DARABAN KALAN	NTS	
798	12102-0446007-5	ZAHOR UL ISLAM	YAR MUHAMMAD	DIK	GPS NO.2 RORI	30 Dec 1990	17 May 2014	87.10	KULACHI	NTS	
799	12102-7840730-7	SHAHZADA KHAN	MAHMOOD KHAN	DIK	GPS ZARKANI	14 Sep 1988	05 Dec 2014	87.09	KULACHI	NTS	
800	12101-1005269-1	MUHAMMAD KHALID	SAJF ULLAH	DIK	GPS PAROVA NO 4	09 Feb 1985	17 May 2014	87.08	PAROVA	NTS	
801	12104-1435828-9	GHULAM FAROOQ	GHULAM MUHAMMAD	DIK	GPS MOGA	07 Nov 1978	05 Dec 2014	87.05	DARABAN KALAN	NTS	
802	12101-0861062-1	FAHAD NADEEM	SORAIL NADEEM	DIK	GPS W/ BALOCHAN NN	05 Sep 1982	17 May 2014	87.04	DIKHAN	NTS	

M. Anwar Awami  
Advocate Supreme Court  
Lahore

143

Annexure - F



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

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

18

Office No. 1135 / F-PST/DEO(M)

Dated DIKhan the 08/01/2021

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

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

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

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

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

*M. Anwar Awan*  
DISTRICT EDUCATION OFFICER  
(MALE) DERA ISMAIL KHAN

Office No. \_\_\_\_\_ / F-PST

Dated DIKhan the \_\_\_\_/\_\_\_\_/2021

Copy of above is forwarded for information to the:-

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

*M. Anwar Awan*  
DISTRICT EDUCATION OFFICER  
(MALE) DERA ISMAIL KHAN

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

19

..... Better Copy.

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

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

To,

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

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

Memo;

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

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

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

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

Dated No. \_\_\_\_/F-PST dated DIKhan the \_\_\_\_/\_\_\_\_/2021

Copy of above is forwarded for information to the:

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

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

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

777

- 20 -

District Education Officer Dera Ismail Khan

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

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

Respected Sir,

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

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

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

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

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

*Received*  
*04/11/21*

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

Office of 76  
*04/11/21*  
Diary No. ....

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

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

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

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

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

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

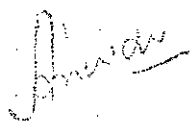
1st, the combined juniors, and seniors

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

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

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

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

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

Dated: 06/01/2021

Copy is forwarded for information and necessary action to:

Director E&SED KP

Secretary Education Khyber Pakhtunkhwa

0343-2060989

- 1. (21) سید محمد صالح
- 2. (22) سید محمد صالح
- 3. (23) سید محمد صالح
- 4. (24) سید محمد صالح
- 5. (25) سید محمد صالح

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

151

Annexure B

- 4 -



DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA BUREAU

23

The Director, Government Office (G.O.)  
D.I. Khan  
Subject: RESERVATION AGAINST THE SENIORITY MERIT CRITERIA  
(S.M.C. 2019)

Memo  
I am directed to refer your office letter No. 145/1100/01 dated 10/05/2019, subject  
mentioned above and to ask you to deal the case at your own responsibility.

*[Signature]*  
Asst. Director, Govt. Office  
Elementary & Secondary Edu.  
Khyber Pakhtunkhwa Bureau  
14/5/2019

Copy forwarded to the:

1. P.A. to Director, Elementary and Secondary Education, Govt. Office

*[Signature]*  
Asst. Director, Govt. Office  
Elementary & Secondary Edu.  
Khyber Pakhtunkhwa Bureau  
14/5/2019

*[Signature]*

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

Director, Government Office (G.O.)  
D.I. Khan

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

No. \_\_\_\_\_/Appeal DIKhan  
Date Peshawar the \_\_/\_\_/2021

To,

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

**SUBJECT:-**

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

Memo;

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

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

Copy forwarded to;

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

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

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



(155) - H -

Received  
22/03/21

D. No # 5184  
22/03/21

District Education Officer  
(Male) D. I. Khan

(25)

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

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

Respected Sir,

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

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

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

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

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

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

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

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

*M. Anwar Awal*

M. Anwar Awal  
Attorney at Supreme Court  
Islamabad

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.

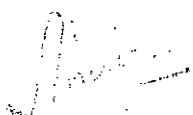
Last but not the least, there are several paradoxes in the Seniority/promotion orders of primary school teachers of NTS based 2014.

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.

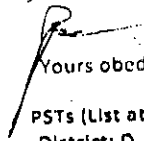
  
M. Anwar Awan  
Advocate Supreme Court  
D.I. Khan

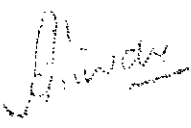
It was clearly stated that Seniority/promotions orders will be designed accordance to "THE KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, SENIORITY/PROMOTION & TRANSFER) RULES, 1989 and KP assembly act 2018 but in practice they are completely ignored.

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

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

Date: 15-03-2021

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

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

Dated: 04/01/2011

Copy is forwarded for information and necessary action to:

Director E&SED KP

0343-2066-89

Secretary Education Khyber Pakhtunkhwa

- 1. سید محمد علی گیلانی
- 2. سید محمد رفیق
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0344-7523678  
0344-88675

M. Anwar  
Advocate Supreme Court

# وکالت نامہ



**SUPREME COURT  
BAR ASSOCIATION  
PAKISTAN**

Sanaullah Shamim Gandapur  
Advocate



President

Secretary

29



بعدالت جناب سروسٹریٹس اور  
منجانب مظہر اقبال  
بنام حکومت پاکستان  
دعویٰ یا جرم  
تفصیل دعویٰ یا جرم  
اسیل

## باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بیرونی و جمہوری برائے قومی یا تہہ بہ مقدمہ بمقام ڈی جی کیلئے  
تینا الہ اللہ علیہ وسلم اور محمد الزکریا علیہ السلام اور ان کے اولاد کے لئے  
کو حسب ذیل شرائط پر وکیل مقرر کیا ہے، کہ میں ہر قومی پر خود یا بذریعہ حق ارحام سرور بعدالت حاضر ہوتا ہوں گا اور ہر وقت ہر ارے جانے مقدمہ وکیل صاحب  
موصوف کا اطلاع دے گا اور حاضر عدالت کروں گا اگر قومی پر مظہر حاضر نہ ہوگا اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف  
اسکے کسی طرح ذمہ دار نہ ہوں گے، نیز وکیل صاحب موصوف صدر مقام پٹنہ کی جگہ یا پٹنہ کے اوقات سے پہلے یا پیچھے یا بعد از قیام بیرونی کرنے کے  
ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پٹنہ کی جگہ یا پٹنہ کے اوقات سے پہلے یا پیچھے یا بعد از قیام بیرونی کرنے کے ذمہ دار نہ  
ہوں گے اور مقدمہ صدر پٹنہ کی جگہ یا پٹنہ کے اوقات سے پہلے یا پیچھے یا بعد از قیام بیرونی کرنے کے ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پٹنہ  
دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا جمانہ واپس کرنے سے بھی موصوف ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پٹنہ کی جگہ یا پٹنہ کے اوقات سے پہلے یا پیچھے یا بعد از قیام بیرونی کرنے کے  
ذات خود منظور قبول ہوگا اور صاحب موصوف کو مرضی دعویٰ یا جواب دہی یا درخواست اجراءے ڈگری و نظر یا اپیل گرانہ اور جرم، خواہت پر دخل و تصدیق کرنے کا  
بھی اختیار ہوگا اور کسی حکم یا ڈگری کرانے اور جرم کا رویہ وصول کرنے اور سیدہ دینے اور واپس کرنے اور جرم کے بیان دینے اور اس پر جانشینی یا راشی نامہ و فیصلہ پر  
حلف کرنے یا قیام دعویٰ کا بھی اختیار ہوگا اور بصورت مقرر ہونے تاریخ قومی مقدمہ کو بعد دوران از پٹنہ صدر بیرونی مقدمہ ذمہ دار نہ ہوں گے اور نظر جانی واپس گرانہ و ویر آمدنی  
مقدمہ یا مشورتی ڈگری یا طرف یا درخواست حکم انتہائی یا قری یا اگر قومی نظر از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا تکی علیحدہ جگہ بیرونی کا اختیار ہوگا  
اور تمام ساختہ پر واکتہ صاحب موصوف صدر مقام پٹنہ کی جگہ یا پٹنہ کے اوقات سے پہلے یا پیچھے یا بعد از قیام بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ کو یہ یا اسکے کسی جزو  
کی کارروائی یا بصورت درخواست نظر جانی اپیل یا گرانہ یا دیگر معاملہ مقدمہ ذمہ دار نہ ہوں گے اور دوسرے وکیل یا پٹنہ کو جانے یا اپنے ہر امر مقرر کریں اور ایسے مشیر قانون کو  
بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور وہ ایسا مقدمہ میں جو جگہ ہر جگہ التوا ہو گیا وہ صاحب  
موصوف کا حق ہوگا مگر صاحب موصوف کو پوری ٹیس تاریخ قومی سے پہلے ادا نہ کروں گا تو صاحب موصوف اپنا اختیار ہوگا کہ مقدمہ کی بیرونی نہ کریں اور ایسی  
صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے تاکہ مستند ہے

تاریخ: 10/1

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

Handwritten signatures and stamps, including a large signature on the left and a stamp on the right.

M. Anwar Awan  
Advocate Supreme Court  
D.L.Khau

03339962231

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

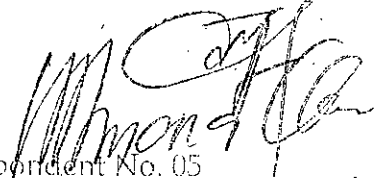
SERVICE APPEAL No. 7509/21

Syed Sohail Ahmad Shah Gillani & 33 VS

Government of KPK

Index

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



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

S.A. no: 7520/2021.

Mazhar Iqbal vs Govt F.K.P.K.

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

SERVICE APPEAL No. 7509/21

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

COMMENTS ON BEHALF OF RESPONDENTS.

PRELIMINARY OBJECTIONS

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

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

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(6/8/2022)

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**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.

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 refused. The seniority was prepared on

merit position and score/ Academic Record not basis of first appointment orders. As the

respondent no. 11 to 17 were high in merit and score as compare to the appellants. So they

were (Respondents) were senior seniority list of PST Teachers as compare to the appellants.

(Annexure A)

5. Incorrect / not admitted. Para is strongly denied. Now the General rule for promotion in

Education Department is not to consider the length of Service but the merit formula and score

in academic record.

6. Para pertains to the reservations on seniority list. Hence on comments.

7. Para pertains to the departmental appeals which were badly time barred.

8. No comments.

### **Grounds**

1. Incorrect / not admitted; para is strongly denied. The act of respondents was according to law,

with law full jurisdiction.

2. Incorrect / not admitted. The seniority list of all PST teachers was prepared on merit and their

seniority list will be determined on their merit position. Not based on first appointments orders.

3. Incorrect / not admitted. As replied above.

4. Incorrect/ not admitted. The seniority list of all PST was prepared on merit and academic record

not first appointment orders.

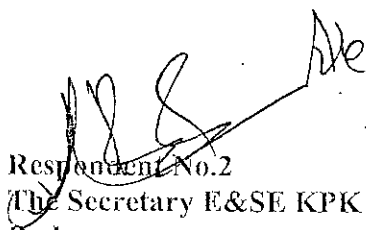
5. Incorrect / not admitted. As discussed above.

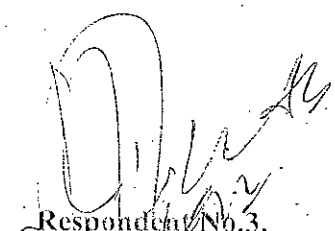
6. That the counsel of appellant may please to raise additional grounds during the

*Respectfully Sheweth*


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

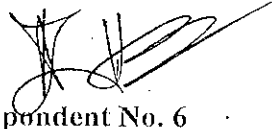
Respondent No.1  
The Chief Secretary E&SE KPK  
Peshawar


  
Respondent No.2  
The Secretary E&SE KPK  
Peshawar

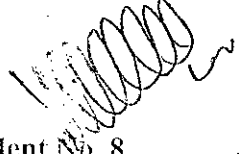
  
Respondent No.3.  
Director E&SE KPK  
Peshawar

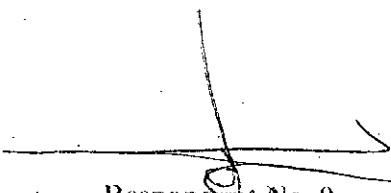
Respondent No. 4  
Assistant Director Estab KP  
Peshawar

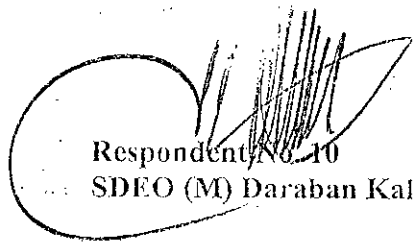
  
Respondent No. 5  
District Education Officer  
(M) D I Khan

  
Respondent No. 6  
SDEO (M) D I Khan

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

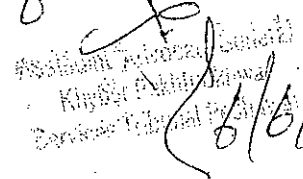
  
Respondent No. 8  
SDEO (M) Kulachi D I Khan

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

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

Submitted for vetting S. Sihal along with 33 being same  
M. Kamran Khan and identical nature  
06.06.2022. M. Kamran

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

  
District Tribunal Peshawar  
6/6/2022



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

Tell: 09669280128- 09669280131.

Email: [emisdik@gmail.com](mailto:emisdik@gmail.com)

**NOTIFICATION:**

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

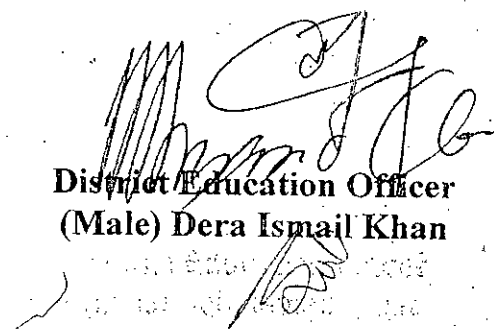
Sd/-

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

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

Copy forwarded for information to the:

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

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

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

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

The committee consists of following members.

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

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

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

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

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

206	12101-0978280-3	SAADULLAH KHAN	HABIB ULLAH KHAN	DIK	GPS NO.9 DIKHAN	10 Jan 1976	05 Dec 2014	130.48	DIKHAN	NTS
207	12102-2620619-1	ABRAR AHMAD	NISAR AHMAD	DIK	GPS NO. 4 DARABAN KALAN	01 Apr 1983	17 May 2014	129.42	DARABAN KALAN	NTS
208	12102-3786840-3	SHAFQAT ULLAH KHAN	BAKKATULLAH KHAN	DIK	GPS HATHALA	04 Aug 1985	17 May 2014	129.22	KULACHI	NTS
209	12103-3730498-5	LIAQAT HUSSAIN KHAN	KHADIM HUSSAIN KHAN	DIK	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
211	12101-4778025-1	MUHAMMAD FAHEEM	SALIM NAWAZ	DIK	GPS BEHARI COLONY	14 Jan 1988	17 May 2014	128.69	DIKHAN	NTS
212	12101-2334729-5	NAQEEB ULLAH	ABDUL LATIF	DIK	GPS WANDA HAIBATTI	15 Mar 1984	17 May 2014	128.47	DIKHAN	NTS
213	12103-6465101-9	MUHAMMAD BILAL	ABDUR REHMAN	DIK	GPS NO.2 PAHARPUR	06 Jan 1986	17 May 2014	128.28	PAHARPUR	NTS
214	12102-8779268-1	HIZBULLAH KHAN	MUHAMMAD ABBAS KHAN	DIK	GPS NO.1 TAKWARA	20 Apr 1987	05 Dec 2014	128.25	KULACHI	NTS
215	12103-7927358-5	MUHAMMAD IRFAN	BASHIR AHMAD	DIK	GPS RANG PUR SHUMALI	09 Dec 1984	17 May 2014	127.91	PAHARPUR	NTS
216	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
217	12103-5436677-1	MUHAMMAD SHOAIB KHAN	IBRAHIM KHAN	DIK	GPS WANDA NARKANI	04 Feb 1993	17 May 2014	127.73	PAHARPUR	NTS
218	11201-6609430-1	ASSAD HUSSAIN SHAH	MASROOR HUSSAIN SHAH	DIK	GPS WANDA TALGI	19 Sep 1989	05 Dec 2014	127.55	PAHARPUR	NTS
219	12101-3032309-7	MUHAMMAD YOUNIS	MUHAMMAD RAMZAN	DIK	GPS KPK	10 Apr 1982	17 May 2014	127.49	DIKHAN	NTS
220	12103-1501335-9	ABDUR RAUF KHAN	MAAZ ULLAH KHAN	DIK	GPS KOT MASOODAN	02 Jan 1977	05 Dec 2014	126.77	PAHARPUR	NTS
221	12101-3144698-1	ISRAR MUHAMMAD	MUHAMMAD BAKHSH	DIK	GPS JHOKE GUMLA	16 Mar 1985	17 May 2014	126.62	PAROVA	NTS
222	12103-1502464-7	QAZI MUHAMMAD ABDUL WAHAB	QAZI KHIZAR HAYAT	DIK	GPS HAFIZ ABAD	25 Feb 1986	17 May 2014	126.23	PAHARPUR	NTS
223	12105-0354017-3	RIAZ ALI KHAN	ANIAZ ALI KHAN	DIK	GPS RAMAK NO 1	15 Sep 1990	17 May 2014	125.50	PAROVA	NTS
224	12101-2071864-1	SHOAIB UR REHMAN	GHULAM SUBHANI	DIK	GPS GARA RASHEED	03 Dec 1985	17 May 2014	125.38	PAROVA	NTS
225	12101-8953208-5	MUHAMMAD ZUBAIR	MUHAMMAD JAVEED	DIK	GPS BALOCH NAGAR	20 Dec 1985	17 May 2014	124.54	DIKHAN	NTS
226	12101-5048995-5	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	DIK	GPS ASIF ABAD	03 Sep 1988	17 May 2014	124.29	PAHARPUR	NTS
228	12102-2136771-9	IMRAN ULLAH	ABDUL WAHAB	DIK	GPS BEHLOL KHEL	10 Feb 1980	17 May 2014	123.87	KULACHI	NTS

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12103-3756	NAZIR AHMAD KHAN	MUHAMMAD KHAN	DIK	GPS HASSANI KHIEL	10 Mar 1988	17 May 2014	123.85	PAHARPUR	NTS
12101-8111998-7	MUHAMMAD ZAFFAR	ALLAH BAKHSH	DIK	GPS PAROVA	06 Dec 2014		123.69	DIKHAN	NTS
12103-2562738-1	MUHAMMAD IMRAN	SHER MUHAMMAD	DIK	GPS RAJAN PUR	10 Mar 1991	17 May 2014	123.55	PAHARPUR	NTS
12101-0991881-9	MUHAMMAD IBRAHIM	MOLVI TMAM BAKHSH	DIK	GPS JATTA	02 Jul 1984	17 May 2014	123.29	PAROVA	NTS
12103-0447973-9	MUHAMMAD QAYYUM	ROZI KHAN	DIK	GPS TOBA	25 Apr 1983	17 May 2014	122.17	PAHARPUR	NTS
12103-9464400-9	MUHAMMAD IRFAN	MUHAMMAD RAMZAN	DIK	GPS NO.2 PAHARPUR	14 May 1986	17 May 2014	122.07	PAHARPUR	NTS
12103-5710032-5	SARDAR KHAN	ABDUL SATTAR KHAN	DIK	GPS KHOKHAR	03 Jul 1981	17 May 2014	122.05	PAHARPUR	NTS
12101-9375468-1	FAZAL UR RAHIM	ABDUR RAHEEM	DIK	GPS NO 2 GILOTI	15 Mar 1985	17 May 2014	121.91	DIKHAN	NTS
12101-9315198-9	SYED ZAIGHAM ABBAS SHAH	GHULAM RASOOL	DIK	GPS KACHA MALLANA NOI	02 Aug 1986	17 May 2014	121.90	PAROVA	NTS
12104-6105338-3	SAMI ULLAH	HIDAYAT ULLAH	DIK	GPS NO. 1 MUSAZAI	21 Apr 1992	17 May 2014	121.49	DARABAN KALAN	NTS
12101-9631824-1	MUHAMMAD ZULQARNAIN HAIDER	SAIF UR REHMAN	DIK	GPS.NO 6 DIKHAN	01 Apr 1988	05 Dec 2014	121.45	DIKHAN	NTS
12104-0478550-3	AMIR HAMZA	MAQBOOL AHMAD	DIK	GPS KHIARA FATEH MUHAMMAD	13 May 1987	17 May 2014	121.39	DARABAN KALAN	NTS
12101-9086383-7	MUHAMMAD ARSHAD	MUHAMMAD JAAN	DIK	GPS KURAI	03 Feb 1989	17 May 2014	121.37	DIKHAN	NTS
12101-4770275-3	MUHAMMAD SHAFIQ	ABDUL LATIF	DIK	GPS TEEKIN	02 Jan 1988	17 May 2014	121.17	DIKHAN	NTS
12103-8409583-7	HAFEEZ ULLAH	GHULAM YASIN	DIK	GPS CHAH MUNDHR WALA	10 Sep 1984	17 May 2014	119.97	PAHARPUR	NTS
12103-8705620-7	MOHAMMAD ARIF	ABDUL ALEEM	DIK	GPS KURRAR	02 Feb 1980	17 May 2014	119.96	PAHARPUR	NTS
12101-5983191-5	MUHAMMAD IQBAL	BASHEER AHMAD	DIK	GPS JHOKE JHEDA	04 Sep 1984	05 Dec 2014	119.96	PAROVA	NTS
12101-7337152-1	MUHAMMAD ASIF	GUL SHER	DIK	GPS WAJHUN	15 Feb 1982	17 May 2014	119.93	PAHARPUR	NTS
12103-5734305-9	JAVED KHAN	SONA KHAN	DIK	GPS BILOT SHARIF	06 Sep 1985	17 May 2014	119.89	PAHARPUR	NTS
12101-1764785-7	MUHAMMAD SHOAIB	FAIZ MUHAMMAD	DIK	GPS MOGA	10 Jan 1988	17 May 2014	119.75	DARABAN KALAN	NTS
12101-7534975-9	AURANGZEB	MUHAMMAD SHAFI	DIK	GPS BEHARI COLONY	12 Sep 1985	17 May 2014	119.54	DIKHAN	NTS
12101-5594929-7	MUHAMMAD SHAKEEL	KHALIL AHMAD	DIK	GPS SULTANIA	12 Apr 1990	17 May 2014	119.47	DIKHAN	NTS
12104-2596828-3	MUHAMMAD JAMSHED	AMIR MUHAMMAD	DIK	GPS NO. 1 KIRI SHAMOZAI	18 Jan 1988	17 May 2014	119.38	DARABAN KALAN	NTS


12101-6127338-1	MUHAMMAD MATI ULLAH	AHMAD SAEED	DIK	GPS BEHARI COLONY	20 Feb 1984	17 May 2014	119.27	DIKHAN	NTS
12102-8432598-3	HAFIZ UR REHMAN	FAZAL REHMAN	DIK	GPS NO.3 MADDI	07 Apr 1989	17 May 2014	119.23	KULACHI	NTS
12103-5723200-1	ABDUL GHAFFAR	MUHAMMAD HUSSAIN	DIK	GPS CHAH LADHA	13 Mar 1986	17 May 2014	119.10	PAHARPUR	NTS
12102-4897404-1	MUHAMMAD IMRAN	SONA KHAN	DIK	GPS NO.2 KULACHI	02 Jul 1985	17 May 2014	119.03	KULACHI	NTS
12102-1414606-5	NAEEM SHAH	HAKHEEM SHAH	DIK	GPS NO. 4 DARABAN KALAN	15 Dec 1982	17 May 2014	118.86	DARABAN KALAN	NTS
12103-8642875-1	MUHAMMAD RIAZ UR REHMAN	SAHIB JAN	DIK	GPS WANDHA YARIK	09 Nov 1988	17 May 2014	118.83	PAHARPUR	NTS
12103-0254015-9	GHULAM SAMDANI	RAZA MUHAMMAD	DIK	GPS MADI KHEL	17 Aug 1986	17 May 2014	118.62	PAHARPUR	NTS
12102-4302096-3	MUHAMMAD RIAZ	HUSSAIN BAKHSH	DIK	GMPS G.RABNAWAZ	19 Feb 1984	17 May 2014	118.57	KULACHI	NTS
12103-5462943-1	MUHAMMAD ALI	RAIS KHAN	DIK	GPS WANDA LALI	09 Jan 1985	17 May 2014	118.30	PAHARPUR	NTS
12103-8486125-7	MUHAMMAD IRFAN ULLAH	GUL BADSHAH	DIK	GPS WANDA LALI	04 Jan 1991	17 May 2014	118.06	PAHARPUR	NTS
12103-2043062-1	KAMRAN ALI	GHULAM HASSAN	DIK	GPS NO.1 PAHARPUR	03 Dec 1984	17 May 2014	117.75	PAHARPUR	NTS
12103-8169823-5	MUHAMMAD ZEESHAN AHMAD	AHMAD NAWAZ	DIK	GPS NO.1 PAHARPUR	20 Apr 1987	17 May 2014	117.63	PAHARPUR	NTS
12101-3036696-5	RIZWAN ULLAH	SHOUKAT ULLAH	DIK	GPS NO.1 ABDUL KHEL	03 Jan 1990	17 May 2014	117.53	PAHARPUR	NTS
12104-8852999-9	MUHAMMAD KAMRAN	MULAZIM HUSSAIN	DIK	GPS MOCHI WAL	03 Mar 1986	17 May 2014	117.24	DARABAN KALAN	NTS
12102-1611179-5	ZAKAULLAH KHAN	ATTA ULLAH KHAN	DIK	GPS NO. 1 KOT SHAHNAWAZ	30 Apr 1985	17 May 2014	117.20	DARABAN KALAN	NTS
12101-7896018-1	HAJI DILAWAR KHAN	HAJI MIRZA KHAN	DIK	GPS KHUTTI	24 Apr 1989	17 May 2014	116.88	DIKHAN	NTS
12102-5672976-7	HAIBAT KHAN	MUHAMMAD AMEER KHAN	DIK	GPS NO.1 KULACHI	11 Feb 1982	17 May 2014	116.83	KULACHI	NTS
12103-0244340-7	MUHAMMAD JABBAR	GHULAM RASOOL	DIK	GPS KACHA MALI KHEL	30 Oct 1988	17 May 2014	116.82	PAHARPUR	NTS
12103-4018813-1	GUL NAWAZ	MUSA KHAN	DIK	GPS NO.1 ABDUL KHEL	15 Mar 1984	17 May 2014	116.81	PAHARPUR	NTS
12102-2134578-7	TAHIR KHAYYAM	TAUS KHAN	DIK	GPS NO.1 KULACHI	16 Feb 1983	17 May 2014	116.75	KULACHI	NTS
12101-3958240-7	ABDUL BASAT	MAULVI GHULAM HASSAN	DIK	GPS KOT ESSA KHAN	02 Jan 1992	17 May 2014	116.49	DIKHAN	NTS
12101-0924424-5	MUSHTAQ AHMAD	JUMMA KHAN	DIK	GPS KHANA SHARIF	02 Jan 1980	17 May 2014	116.40	PAROVA	NTS
12101-7034423-1	MUHAMMAD RAMZAN	SHER ZAMAN	DIK	GPS GARA MORE	05 Mar 1981	17 May 2014	116.35	DIKHAN	NTS


276	12103-6799253-7	MUHAMMAD ZUBAIR KHAN	ABDUL SATTAR KHAN	DIK	GPS WANDA UMARI	03 Feb 1986	17 May 2014	116.3	PAHARPUR	NTS
277	12103-8271339-1	MUHAMMAD YOUNAS	GANMON	DIK	GPS NO 1 UMRAY WALI	03 Mar 1987	17 May 2014	116.25	PAHARPUR	NTS
278	12103-6940574-7	TAHIR KHAN	HAJI NADIR KHAN	DIK	GPS NO.1 PAHARPUR	25 Mar 1992	17 May 2014	116.13	PAHARPUR	NTS
279	12101-5583256-9	SANA ULLAH	MUHAMMAD HANIF	DIK	GPS JK/ QURESHIAN	23 Mar 1987	17 May 2014	115.87	DIKHAN	NTS
280	12101-8289665-1	ASIF ULLAH	GHULAM JAN	DIK	GPS WANDA HAIBATTI	04 Feb 1988	17 May 2014	115.70	DIKHAN	NTS
281	12101-10924552-5	ALLAH BAKHSH	SARDAR BAKHSH	DIK	GPS JHOKE TARHELI NO.02	26 May 1983	17 May 2014	115.55	PAROVA	NTS
282	12101-7341749-1	MUHAMMAD YASEEN	MUHAMMAD AMIN	DIK	GPS NO.10 DIK	20 Sep 1972	17 May 2014	115.49	DIKHAN	NTS
283	12103-3921303-3	SHOUKAT ULLAH	GHULAM MUHAMMAD	DIK	GPS UDWAL	07 Apr 1990	17 May 2014	115.46	PAHARPUR	NTS
284	12101-6829025-5	NAVEED AHMED	ABDUL MAJID	DIK	GPS BASTI DIRKHAN	15 Apr 1985	05 Dec 2014	115.36	DIKHAN	NTS
285	12103-7312799-1	GHULAM MOHAY UD DIN	MUHAMMAD RAMZAN	DIK	GPS BHITANIAN	01 Nov 1984	05 Dec 2014	115.08	PAHARPUR	NTS
286	12102-9927407-1	MUHAMMAD KHALID	ABDUL MAJEED	DIK	GPS NO.3 MADDI	20 Jan 1988	17 May 2014	115.05	KULACHI	NTS
287	12103-1413344-3	SHEIKH JAWAD AHMAD	SHAIKH RIAZ AHMAD	DIK	GPS CHISTIA RIZWIA PHP	31 Dec 1987	17 May 2014	115.02	PAHARPUR	NTS
288	12103-9151950-7	MUHAMMAD ARIF	GHULAM HUSSAIN	DIK	GPS BILOT SHARIF	20 Mar 1983	17 May 2014	114.89	PAHARPUR	NTS
289	12103-1779028-7	MUHAMMAD BILAL	RAB NAWAZ	DIK	GPS TOBA	01 Apr 1992	17 May 2014	114.56	PAHARPUR	NTS
290	12101-3224864-1	MUHAMMAD ZAFRAN	HIDAYAT ULLAH SHAKIR	DIK	GPS NO. 11 DIKHAN	15 May 1989	17 May 2014	114.52	DIKHAN	NTS
291	12101-0915691-1	MUHAMMAD BARAN	MAKHAN KHAN	DIK	GPS NO. 2 HAJI MORA	20 Mar 1979	05 Dec 2014	114.47	DIKHAN	NTS
292	12101-0409535-9	MUHAMMAD QAISER KHAN	SANWAL KHAN	DIK	GPS DARABAN KHURD	01 Oct 1986	17 May 2014	114.42	PAROVA	NTS
293	12101-7672606-1	ASMAT ULLAH	KHUDA BAKHSH	DIK	GPS KOTLA SAIDAN	17 Apr 1986	17 May 2014	114.40	DIKHAN	NTS
294	12101-3228351-9	AZIZ ULLAH	ALLAH WASAYA	DIK	GPS HISSAM	30 Apr 1986	17 May 2014	114.25	DIKHAN	NTS
295	12101-0945908-3	MUHAMMAD BILAL	MALIK SOOBA	DIK	GPS RANGPUR JANUBI	12 Dec 1981	17 May 2014	114.20	PAROVA	NTS
296	12103-1502759-7	ASMAT ULLAH	MUHAMMAD KHAN	DIK	GPS NO. 1 DHALLAH	01 Jan 1978	25 Feb 2017	114.15	PAHARPUR	NTS
297	12102-4662592-1	MUHAMMAD TARIQ	GHULAM MUSTAFA	DIK	GPS NO.1 RORRI	05 Oct 1990	17 May 2014	114.06	KULACHI	NTS
298	12101-7191837-1	MOHAMMAD ATIF SHAHID	AMANULLAH	DIK	GPS KURAI	18 Apr 1983	05 Dec 2014	113.84	DIKHAN	NTS



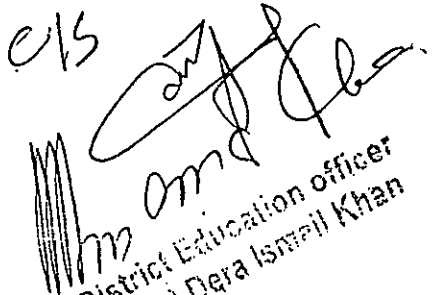
1171	12102-1010340-2	DILAWAR SHAH	YAQUB SHAH	DIK	GPS FATEH ALI	27 Apr 1984	05 May 2017	108.57	DARABAN KALAN	NTS
1172	12101-4208009-7	ZIA UR REHMAN	JUMMA KHAN	DIK	GPS HATHALA	26 May 1990	05 May 2017	107.37	KULACHI	NTS
1173	12105-0352676-5	SAMI ULLAH MALIK	QUDRAT ULLAH	DIK	GPS GARA AASHIQ	30 Apr 1993	05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

119	12101-8047233-5	RISHI HANS	HEERA LAL	DIK	GPS NAI ABADI KOTLA SAIDAN	12 Jul 1996	05 May 2017	90.48	DIKHAN	NTS	
119	12101-7464937-1	SHAFQAT ULLAH	MUHAMMAD AMEEN	DIK	GPS JEEWAYA SAHI	13 Aug 1988	27 Sep 2017	90.37	DIKHAN	NTS	
119	12101-0970848-7	SHANKAR	MANNA LAAL	DIK	GPS KHANA SHARIF	04 Oct 1973	09 Nov 2017	88.76	PAROVA	NTS	
119	12103-149344-1	SYED MUHAMMAD TAQI ZAIDI	SYED NASIR HUSSAIN ZAIDI	DIK	GPS AMIR SHAH	02 Feb 1977	22 Feb 2018		PAHARPUR	DECEASED SON / MEDICAL BOARD QUOTA	
119	12101-7976492-5	MUHAMMAD SOHAIL	GHULAM FARID	DIK	GPS RATTA KULACHI	05 Mar 1980	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
119	12101-9408976-3	KHURAM SHEHZAD	MUHAMMAD IBRAHIM	DIK	GPS AHEER ABAD	01 Apr 1984	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
120	12101-8202352-1	ABDUR RASHID	ABDUR RAHIM	DIK	GPS GOMAL KHURD	31 Jan 1985	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
120	12101-0808292-3	AFTAB MOHAY UD DIN	MOHAMMAD ASLAM	DIK	GPS SHEIKH RAJU	02 Apr 1985	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
120	12101-5595268-1	MUHAMMAD ALI NUMAIR	SYED JAHANGIR ABBAS	DIK	G.P.S WANDA BALOCH KOKAR	21 Mar 1992	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
120	12102-5739990-3	IRFANULLAH	FATEH ULLAH	DIK	GPS NO.2 KOT ESA KHAN	04 Oct 1993	22 Feb 2018		CHODWAN	DECEASED SON / MEDICAL BOARD QUOTA	
120	12101-5310377-9	ALI JAMSHED	JAMSHED AHMAD	DIK	G.P.S SHAIKH YOUSAF	13 Feb 1994	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	

CHAIRMAN: MUHAMMAD SHAFIQ 

MEMBER 1: ASIM SAEED 

MEMBER 2: MUHAMMAD DANISH ROOMAN 

*els*  
  
 District Education officer  
 (Male) Dera Ismail Khan

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

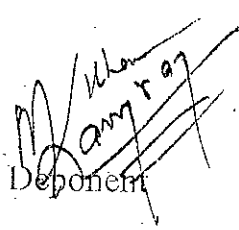
SERVICE APPEAL No. 7509/21

Syed Sohail Ahmad Shah Gillani & 33 VS

Government of KPK

### Affidavit

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

  
Deponent

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

SERVICE APPEAL No. 7509/21

Syed Sohail Ahmad Shah Gillani & 33 VS

Government of KPK

**Authority**

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



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