

28.07.2022

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

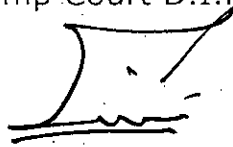

Reader

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

29.02.2022

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


Reader

29.03.2022

Counsel for the appellant present and heard.

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



Chairman
Camp Court, D.I.Khan.

24.05.2022

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



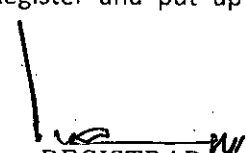

(Salah-Ud-Din)
Member (J)
Camp Court D.I.Khan

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 7517 /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> |

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,

Dt. _____/2020

**REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.**

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

R/s

The objections are rectified.


*Sanaullah
adv*

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. 1362 /S.T,

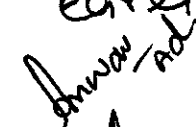
Dt. 19/07 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Sanaullah Shamim Gandapur Adv.

Supreme Court at D.I.Khan

Respected Sir,
Addresses are completed as per rules. Departmental appeal of appellant is attached. Legible copies are annexure A, C, E & G are attached. Photocopies are certified. One set of second member is attached. Appeal and documents are duly verified/affidavit. Annexures are flagged & marked. Certificate is given and photocopies of amended respondents are attached. May kindly fix before the bench at earliest. Objections received on 27.07.2021 are duly certified.


M. Anwar Anwar
(A.S.C.)

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: Ahulam Abbas VS Govt of KPK etc

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

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

Name:

M. Anwar Awan ASE

Signature:

Anwar

Dated:

03/08/2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No 7517 /2021

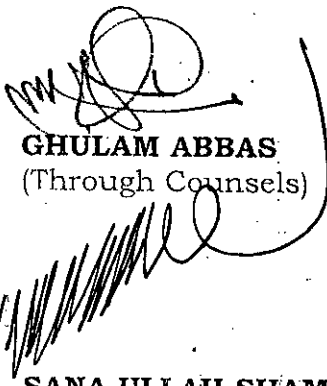
GHULAM ABBAS VERSUS GOVT OF K.P.K etc.

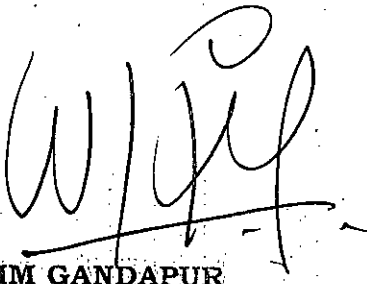
INDEX

| S.NO | Particulars | Annexure | Page No |
|------|--|----------|---------|
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| 2. | Copy of the Petitioner appointment order | A | 7-13 |
| 3. | Copy of regularization order dated 10.03.2018 | B | 14-16 |
| 4. | Copies of office order dated 04.06.2020 and office order dated 24.06.2020 and Seniority list | C,D&E | 17-20 |
| 5. | Copies of objection/reservation and its reply. | F&G | 21-27 |
| 6. | Departmental applications/appeals | H | 28-31 |
| 7. | Wakalatnamas | | 32 |

YOURS HUMBLE APPELLANT

Dated: /06/2021


GHULAM ABBAS
(Through Counsels)


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

KANEEZ BATOOL
Advocate High Court D.I.Khan

- 1 -

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No 7517 /2021

GHULAM ABBAS PST GPS BABBAR PAKKA.

(Appellant)

Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Blary No. 7282

Dated 15/7/2021

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

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

Filed to-day

Registrar

- 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
14. 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.

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 approach 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.

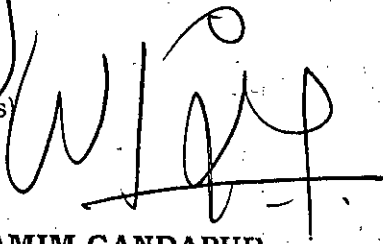
OR

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


GHULAM ABBAS
(Through Counsels)


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

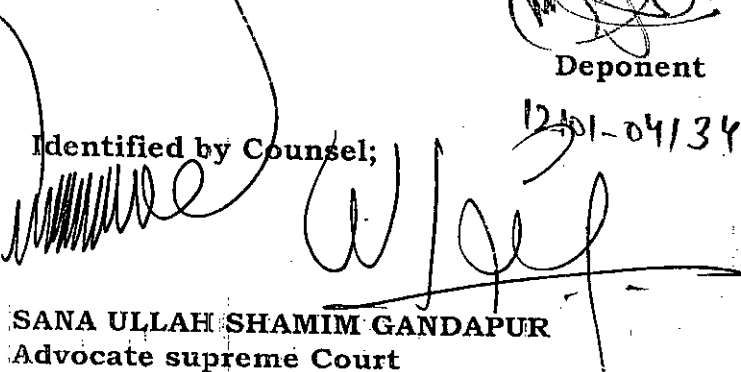
KANEEZ BATOOL
Advocate High Court D.I.Khan

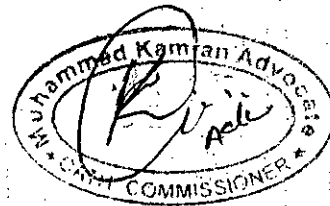
AFFIDAVITE

I, GHULAM ABBAS PST GPS BABBAR PAKKA. 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

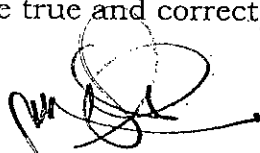
GHULAM ABBAS VERSUS GOVT OF K.P.K etc.

BOOKS REFERED;

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

VERIFICATION; / CERTIFICATE :

I, **GHULAM ABBAS**, 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.



GHULAM ABBAS



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

- 7 -

APPOINTMENT

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

| S.No | Roll No | NAME | FATHER'S NAME | CNIC | SCORE | PLACE OF POSTING | UNION COUNCIL |
|-------------------------|---------|------------------------|----------------------|-----------------|--------|----------------------|---------------|
| DERA ISMAIL KHAN | | | | | | | |
| 1. | 1760002 | MUHAMMAD SHAHID | QAYYUM NAWAZ | 12101-6286930-3 | 93.5 | GPS DARWESHA | CHEHKAN |
| 2. | 1760177 | BASHIR AHMAD | MUHAMMAD AFZAL | 12101-8038430-1 | 97.19 | GPS GARA BALA | CHEHKAN |
| 3. | 1760752 | NAVEED AHMAD | NAZIR AHMD | 12101-2041550-9 | 109.58 | GPS GARA HASSANI | CHEHKAN |
| 4. | 1760368 | MUHAMMAD RAMZAN | SHER ZAMAN | 12101-7034423-1 | 116.35 | GPS GARA MORE | CHEHKAN |
| 5. | 1760733 | RAHMAF ULLAH | SARFARAZ | 12101-5709320-3 | 95.33 | GPS HAIN DAN | CHEHKAN |
| 6. | 1760335 | MAZHAR IQBAL | MUHAMMAD IQBAL | 12101-4536514-5 | 87.57 | GPS JANDI SINDH | 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 HASAT | 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 ALTAZ KHAN | UMAR HAYAT KHAN | 12101-7309163-5 | 98.29 | GPS TAJ | CHEHKAN |

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

| S.N. | Roll No. | NAME | FATHER'S NAME | CNIC | SCORE | PLACE OF POSTING | UNION COUNCIL |
|------|----------|--------------------|---------------------|-----------------|--------|----------------------|---------------|
| 596. | 1760936 | BASHIR AHMAD | ALLAH DAD | 12101-0923553-7 | 111.75 | GPS GARA GHUNS SHAH | Naivela |
| 597. | 1763132 | MUHAMMAD IMRAN | GHULAM YASIN | 12101-5142048-1 | 107.22 | GPS GARA GHUNS SHAH | Naivela |
| 598. | 1760396 | SHAUKAT IQBAL KHAN | AMAN ULLAH | 12101-3535761-3 | 105.03 | GPS GARA GHUNS SHAH | Naivela |
| 599. | 1760536 | SHOAIB UR REHMAN | GHULAM SUBHANI | 12101-2071864-1 | 125.38 | GPS GARA RASHID | Naivela |
| 600. | 1762569 | ABDUR RASHID | ABDUL MAJEED | 12101-5364225-9 | 102.87 | GPS GURMANI | Naivela |
| 601. | 1760217 | MUHAMMAD SHEHZAD | GHULAM YASIN | 12101-5046193-1 | 133.26 | GPS HAJI BABBAL | Naivela |
| 602. | 1760744 | MUHAMMAD IBRAHIM | IMAM BAKHSH | 12101-0991881-9 | 123.29 | GPS JATTA | Naivela |
| 603. | 1760725 | ABDUL QAIDIR | NAZIR AHMAD KHAN | 12101-5911194-3 | 112.09 | GPS JATTA | Naivela |
| 604. | 1761905 | MUHAMMAD KAMRAN | MALIK SUBA | 12105-0344435-5 | 104.43 | GPS JATTA | Naivela |
| 605. | 1760806 | HAJI MUHAMMAD | ABDUR REHMAN | 12101-7338172-9 | 98.28 | GPS JH MASSU | Naivela |
| 606. | 1760041 | MUSHTAQ AHMAD | JUMA KHAN | 12101-0924424-5 | 116.4 | GPS KHANA SHARIF | Naivela |
| 607. | 1760268 | AMAN ULLAH | ALLAH BAKHSH | 12101-9678214-7 | 86.77 | GPS BABAR KACHA | PAROA |
| 608. | 1763630 | GHULAM ABBAS | MUHAMMAD ASLAM KHAN | 12101-0413474-5 | 88.23 | GPS BABAR PAKKA | PAROA |
| 609. | 1762943 | MUHAMMAD AAMIR | MUHAMMAD RAMZAN | 12101-4243356-7 | 83.89 | GPS BABAR PAKKA | PAROA |
| 610. | 1760642 | MUHAMMAD RAMZAN | MUHAMMAD BAKHSH | 12101-1470463-1 | 85.4 | GPS BASTI AIALIK MIR | PAROA |
| 611. | 1760457 | MUHAMMAD SHAFQAT | ABDUL AZIZ | 12101-2526976-1 | 87.77 | GPS BURKI | PAROA |
| 612. | 1763977 | MUHAMMAD IMRAN | LAAL KHAN | 12101-7582792-7 | 85.37 | GPS HAZARA KACHA | PAROA |
| 613. | 1762876 | MUHAMMAD IMRAN | HAJI ISMAIL | 12101-1324020-7 | 122.05 | GPS JH, MACH SHERQI | PAROA |
| 614. | 1760566 | HAMADULLAH | GHULAM HUSSAIN | 12101-6121532-1 | 89.18 | GPS JH, SALAUD DIN | PAROA |
| 615. | 1763279 | GHULAM MURTAZA | SIRAJ U DIN | 12101-6724482-3 | 97.63 | GPS NO.1 PAROA | PAROA |
| 616. | 1760592 | GHULAM YASIN | AHMAD BAKHSH | 12101-2858944-9 | 100.4 | GPS NO.2 PAROA | PAROA |
| 617. | 1760107 | INAAL ULLAH | RAHMAT ULLAH KHAN | 12101-2356055-5 | 86.53 | GPS NO.3 PAROA | PAROA |

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

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

TERMS & CONDITIONS

1. NO 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.

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

-10-

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

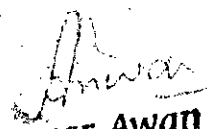
Endst No. 7135-7765 /PST(M) NTS

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) 2nd Phase: D.I.Khan

Annexure

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

+ Responses
17/11/19

- 11 -

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. | CHG | Merit Position | Place of Posting | Other Details |
|----------|-------------------------------------|----------------------|------------|-----------------|----------------|-----------------------|---------------|
| 1 | 1760493 RANMATT ULLAH | MUHAMMAD AMIR | 06/06/1984 | 12101-822682-3 | 31.49 | GPS CHEHRAN | CHEHRAN |
| 2 | 1750921 HAFIZ MOHAMMAD TAHIR RASHID | ABDUR RASHID KHAN | 01/08/1989 | 12101-4607199-9 | 100.35 | GPS GARA AHMAD | CHEHRAN |
| 3 | 1760332 ASIF MAWAZ | ALLAH MAWAZ | 01/04/1994 | 12101-4701591-3 | 83.22 | GPS GARA DAD | CHEHRAN |
| 4 | 176223 MUHAMMAD BILAL | ABDUL SAJJID | 87 | 12101-7201439-7 | 111.67 | GPS GARA MOCHI | CHEHRAN |
| 5 | 176824 MUHAMMAD YASIR KHAN | ABDUS SALAM | 04/01/1986 | 12101-4119138-3 | 94.95 | GPS NO. 1 POTA | CHEHRAN |
| 6 | 176027 FARSEEN ULLAH | FAZAL AHMAD | 14/05/1992 | 12101-5027815-5 | 84.31 | GPS SHERU KOHNA | CHEHRAN |
| 7 | 1763356 KHADIM RASOOL | SAID RASOOL | 15/01/1973 | 12101-3907680-9 | 84.82 | GPS SHERU SAU | CHEHRAN |
| 8 | 174000 MUHAMMAD QASIM MODDASIR | HAFIZ ELAH BAKSHI | 05/05/1988 | 12101-5713694-9 | 95.46 | GPS AISHA MASJID | DD=2 |
| 9 | 176849 NAJAM ALI | AASHIQ HUSSAIN SHAH | 07/04/1981 | 12101-0919404-9 | 108.59 | GPS CHAGI SARWAR | DD=2 |
| 10 | 176261 NAVEED AHMED | ABDUL MAJID | 15/04/1985 | 12101-6829025-5 | 115.36 | GPS BAST DIRKHAN | DD=2 |
| 11 | 1764245 NAJIB ULLAH KHAN | HABIBULLAH KHAN | 17/05/1984 | 12101-0651236-9 | 106.62 | GPS CHAH BARRY VALA | DD=1 |
| 12 | 1762598 MALIK MUHAMMAD ALTAF | MUHAMMAD NAWAZ | 15/05/1979 | 12101-6092355-5 | 83.63 | GPS KASSA | DD=2 |
| 13 | 1760860 ISHTIAQ AHMED | SOFI GHULAM HASSAN | 23/03/1976 | 12101-9150180-1 | 103.22 | GPS KACHI PAJNO KHAN | DD=2 |
| 14 | 1760472 MUHAMMAD TARIQ | MUHAMMAD RAMZAN | 24/09/1978 | 12101-0956478-3 | 100.98 | GPS NO. 2 THOYA FAZIL | DD=2 |
| 15 | 1760973 IHSAN ULLAH | GHULAM HASSAN | 22/11/1988 | 12101-1599768-3 | 88.57 | GPS NO. 2 THOYA FAZIL | DD=2 |
| 16 | 1761633 SAJAD SHAH | MUHAMMAD KHALID UMAR | 12/03/1984 | 12101-3633944-9 | 89.58 | GPS TAJIM ABAD | DD=2 |
| 17 | 1769532 NADEEM KHAN | ABDUR REHMAN | 01/07/1973 | 12101-0913321-7 | 107.87 | GPS MAD ALI SIYAH | DEWANA |
| 18 | 1761605 MUHAMMAD NASR KHAN | SHAH MAWAZ KHAN | 10/10/1981 | 12101-0375395-1 | 100.57 | GPS POLICE LINE | DEWANA |
| A | 1766602 IHSAN ULLAH | SADIQ JAN | 01/04/1991 | 35202-3244776-7 | 111.6 | GPS SHARADARI | GILOTI |
| B | 1763950 USMAN ALI | HAZIR AHMAD | 04/02/1985 | 12101-5721982-9 | 115.91 | GPS NO. 1 GILOTI | GILOTI |

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

| 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 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.
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. Anwar Awan
 M. Anwar Awan
 Advocate, Supreme Court

- 13 -

Appointment Orders PST (Male) 2nd 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(NTS) 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 Awais
Advocate Supreme Court
D.I.Khan



District Education Officer (M)
Dera Ismail Khan

- B -

- 14 -

Regularization Order PST I/(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.

| 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 | MUAHAMMAD 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 | RAJIMAT ULLAH | 95.33 | GPS HAIN DAN | 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 SINDHI | 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 | RAD NAWAZ | 95.9 | GPS NURANG UTRA | Chehkan | No. 7135-7765 Dated 17-05-2014 | No. 15408-14 Dated 02-06-2017 | 12101-7539649-3 |
| 9 | 1764043 | ABDUL BASAT | 116.49 | GPS SHERU KOHNA | Chehkan | No. 7135-7765 Dated 17-05-2014 | No. 15408-14 Dated 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

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

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

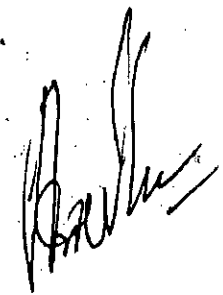
1. The regularization will not be in favour of those, who have not taken over charge or has remained absent from duty or resigned from service and also not for those who are under disciplinary proceedings.
2. Their services shall be governed by the Khyber Pakhtunkhwa Civil Servants Act, 1973, the Khyber 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

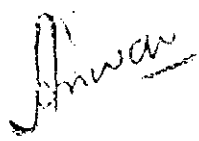
Endst: No. 8712-10760 /Estt (Primary)
 Copy forwarded for information and necessary action to the: -

Dated DIKhan the 10/03 2018

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 Awan
 Advocate Supreme Court
 D.I.Khan

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

17

Endst: No. 11728

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 or otherwise.

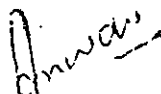

DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN


Endst: No. 11729-331

Dated: 04/06/2020

Copy for information to the:-

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


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


DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN

- D -

18

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~~Amir~~



**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.

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

Anwar
M. Anwar Awan
Advocate Supreme Court
D.I.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 |
|-----------|-----------------|---------------------|--------------------|----------|--------------------------|---------------|-----------------------|-------|---------------|-----------------------|---------|
| 1 | 12101-8104636-5 | SHAH JAHAN | GUL DAD | DIK | GMPS JALAL BORING | 17 Mar 1961 | 01 Feb 1979 | | DIKHAN | DIRECT APPOINTMENT | |
| 2 | 12101-8000082-7 | AZIZ ULLAH | SAAD ULLAH | DIK | GPS DIN PUR | 20 May 1961 | 26 May 1982 | | DIKHAN | DIRECT APPOINTMENT | |
| 3 | 12103-1490966-3 | MUSHTAQ AHMAD | RAB NAWAZ | DIK | GPS MITHA PUR KALAN | 10 Apr 1962 | 16 Dec 1982 | | PAHARPUR | DIRECT APPOINTMENT | |
| 4 | 12103-1482132-1 | ALLAH NAWAZ | MUHAMMAD NAWAZ | DIK | GPS KALA GORH | 10 Sep 1962 | 17 Nov 1983 | | PAHARPUR | DIRECT APPOINTMENT | |
| 5 | 12013-3841194-3 | GHANI-UR-REHMAN | SHER DIL | DIK | GPS NO.1 PAHARPUR | 01 Nov 1962 | 20 Dec 1983 | | PAHARPUR | DIRECT APPOINTMENT | |
| 6 | 12101-0961741-7 | ASEEM KHAN | AZAM KHAN | DIK | GPS GILOTI | 01 May 1963 | 19 May 1984 | | DIKHAN | DIRECT APPOINTMENT | |
| 7 | 12101-0965650-3 | MUHAMMAD RASHID | GHULAM JEELANI | DIK | GPS KOKAR GHARBI | 10 Sep 1961 | 05 Sep 1984 | | DIKHAN | DIRECT APPOINTMENT | |
| 8 | 12102-2150050-7 | ABDUL SAMAD KHAN | ABDUL GHAFAR | DIK | GPS BASTI BALOCHAN | 28 Apr 1961 | 17 Oct 1984 | | DARABAN KALAN | DIRECT APPOINTMENT | |
| 9 | 12101-0939011-5 | ABDUL RASHID | IMAM BAKHSH | DIK | GMPS HAZARA PAKKA | 15 Oct 1963 | 17 Oct 1984 | | PAROVA | DIRECT APPOINTMENT | |
| 10 | 12103-1501762-9 | MUHAMMAD ABBAS SHAH | ABDUL HUSSAIN SHAH | DIK | GPS SAID ALIYAN | 15 Apr 1965 | 17 Oct 1984 | | PAHARPUR | DIRECT APPOINTMENT | |

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

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

M. ATWAGE AWAN
Advocate Supreme Court
Dikhlan

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Annexure F



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

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

21

Order 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 1st phase i.e. on 17/05/2014, whereas the deferred cases Teachers were appointed in the 2nd 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 1st 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.



DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN

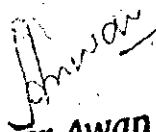
Order No. _____/F-PST

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 Awan
Advocate Supreme Court
D.I.Khan

..... 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 1st phase i.e on 17/05/2014, whereas the deferred cases Teachers were appointed in the 2nd 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 1st 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 Awan
Advocate Supreme Court
D.I.Khan

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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).

Rameel
04/11/21

Office of 76
04/11/21 Office
Diary

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

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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.

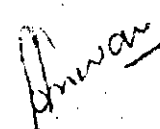
1st, the combined juniors, and seniors

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

Handwritten notes in Urdu script, including names and phone numbers. The text is arranged in columns and rows, with some entries circled or underlined. Legible entries include:

- 0346-7878564
- 0345-785724
- 0347-740076
- 0344-690374
- 0342-2653616
- 0345-9819665
- 0344-6596479

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

4-151

Annexure 'G'

26



DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
GOVERNMENT OF PUNJAB, LAHORE

The Director, Education Office, P. O. Khan.

Subject: **RESERVATION AGAINST THE SENIORITY LIST FOR RESERVE (RES-III)**

Memorandum: I am directed to refer your office letter dated 14.12.2021 on the subject cited above and to ask you to deal the case at your own level of competence and authority.

[Signature]
Assistant Director and
Elementary & Secondary
Education, Government of Punjab
14/12/2021

Copy forwarded to the:

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

[Signature]
Assistant Director (Elementary & Secondary Education)
Government of Punjab
14/12/2021

[Signature]
M. Anwar Awan
Advocate Supreme Court
P.O. Khan

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..... Better Copy.

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

No. _____/Appeal DIKhan
Date Peshawar the __/__/2021

To,

Th 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.**

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

To,

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

Received
22/03/21
D. No # 5184
22/03/21
District Education Officer
(Male) D. I. Khan

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

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

(IC)

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.

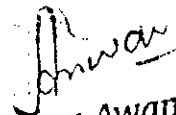
Last but not the least, there are several paradoxes in the Seniority/promotion orders of primary school teachers of NTS based 2014.

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.

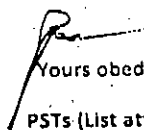

M. Anwar Awan
Advocate Supreme Court
D.I.Khan

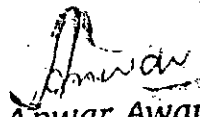
It was clearly stated that Seniority/promotions orders will be designed accordance to "THE KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, SENIORITY/PROMOTION & TRANSFER) RULES, 1989 and KP assembly act 2018 but in practice they are completely ignored.

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

| Sl. No. | Name | Address | Profession | Signature |
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M. Anwar Awan
 Advocate Supreme Court
 D.I. Khan

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

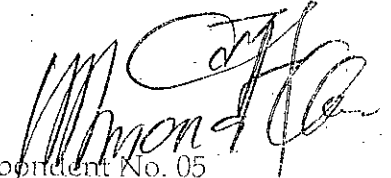
SERVICE APPEAL No. 7509/21

Syed Sohail Ahmad Shah Gillani & 33 VS

Government of KPK

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| 02 | Annexure | | 5-12 |
| 03 | Affidavit | | 13 |
| 04 | Authority | | 14 |



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

S.A. No: 7517/2021

Ghulam Abbas vs D.E.O (m)

D. I. Khan

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

SERVICE APPEAL No. 7509/21

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

COMMENTS ON BEHALF OF RESPONDENTS.

PRELIMINARY OBJECTIONS

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

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

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(6/6/2022)

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

D.I.Khan

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

Factual objections

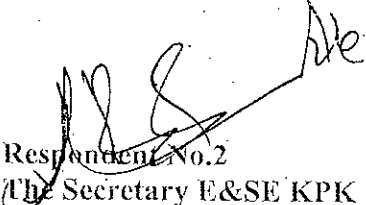
1. Para pertains to the appointment of appellants on 17-05-2014 and respondents appointments on 05-12-2014.
2. Para pertains to the regularization of appellants on 10-03-2018.
3. Para pertains to the seniority list of appellants issued by DEO (M) D I Khan. On 04-06-2020. Where as the departmental appeals were filed on 15-03-2021. Which are time barred.
4. Incorrect/ not admitted. Para is strongly denied and refuted. The seniority was prepared on merit position and score/ Academic Record not basis of first appointment orders. As the respondent no. 11 to 17 were high in merit and score as compare to the appellants. So they were (Respondents) were senior seniority list of PST Teachers as compare to the appellants. (Annexure A)
5. Incorrect / not admitted. Para is strongly denied. Now the General rule for promotion in Education Department is not to consider the length of Service but the merit formula and score in academic record.
6. Para pertains to the reservations on seniority list. Hence on comments.
7. Para pertains to the departmental appeals which were badly time barred.
8. No comments.

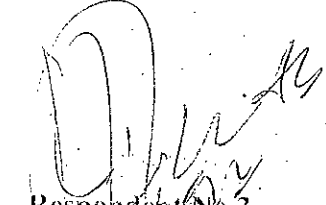
Grounds

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

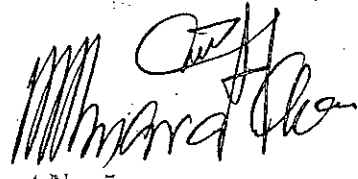
So it is humbly prayed that appeal of appellant may kindly be dismissed with Cost.

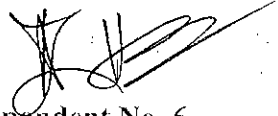
Respondent No.1
The Chief Secretary E&SE KPK
Peshawar



Respondent No.2
The Secretary E&SE KPK
Peshawar

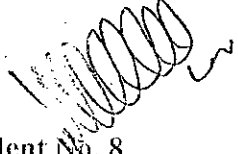

Respondent No.3.
Director E&SE KPK
Peshawar


Respondent No. 4
Assistant Director Estab KP
Peshawar

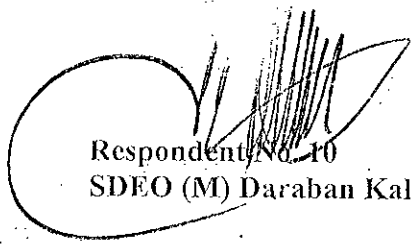

Respondent No. 5
District Education Officer
(M) D I Khan


Respondent No. 6
SDEO (M) D I Khan


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

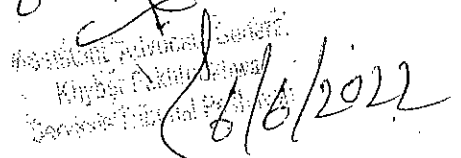

Respondent No. 8
SDEO (M) Kulachi D I Khan


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


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

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

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


6/6/2022



OFFICE OF THE DISTRICT EDUCATION OFFICER

(MALE) DERA ISMAIL KHAN

Tell: 09669280128- 09669280131.

Email: emisdik@gmail.com

NOTIFICATION:

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

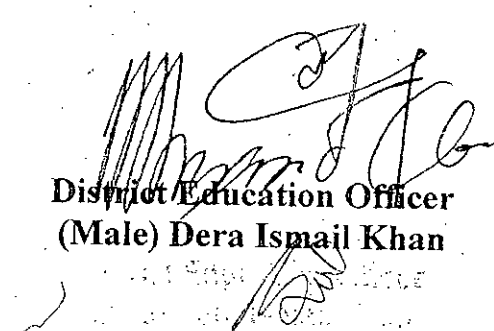
Sd/-

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

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

Copy forwarded for information to the:

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


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

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

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

The committee consists of following members.

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

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

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

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

| SERIAL NO. | CNIC | NAME | FATHER NAME | DOMICILE | PRESENT PLACE OF POSTING | DATE OF BIRTH | DATE OF TAKING CHARGE | SCORE | TEHSIL | METHOD OF APPOINTMENT | REMARKS |
|------------|-----------------|---------------------|--------------------|----------|--------------------------|---------------|-----------------------|-------|---------------|-----------------------|---------|
| Pem | 12101-8104636-5 | SHAH JAHAN | GUL DAD | DIK | GMPS JALAL BORING | 17 Mar 1961 | 01 Feb 1979 | | DIKHAN | DIRECT APPOINTMENT | |
| Pem | 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 | |
| Sec | 12101-0965650-3 | MUHAMMAD RASHID | GHULAM JEELANI | DIK | GPS KOKAR GHARBI | 10 Sep 1961 | 05 Sep 1984 | | DIKHAN | DIRECT APPOINTMENT | |
| Pem | 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 SAJD ALIYAN | 15 Apr 1965 | 17 Oct 1984 | | PAHARPUR | DIRECT APPOINTMENT | |

| | | | | | | | | | | |
|-----|-----------------|---------------------------|------------------------|-----|-------------------------|-------------|-------------|--------|---------------|-----|
| 200 | 12101-0978280-3 | SAADULLAH KHAN | HABIB ULLAH KHAN | DIK | GPS NO. 9 DIKHAN | 10 Jan 1976 | 05 Dec 2014 | 130.48 | DIKHAN | NTS |
| 201 | 12102-2620619-1 | ABRAR AHMAD | NISAR AHMAD | DIK | GPS NO. 4 DARABAN KALAN | 01 Apr 1983 | 17 May 2014 | 129.42 | DARABAN KALAN | NTS |
| 202 | 12102-5786840-3 | SHAFQAT ULLAH KHAN | BARKATULLAH KHAN | DIK | GPS HATHALA | 04 Aug 1985 | 17 May 2014 | 129.22 | KULACHI | NTS |
| 203 | 12103-3730498-5 | LIAQAT HUSSAIN KHAN | KHADIM HUSSAIN KHAN | DIK | GPS BAND KURAI | 14 Aug 1981 | 17 May 2014 | 129.02 | PAHARPUR | NTS |
| 204 | 12101-6238687-7 | IRSHAD ULLAH | MUHAMMAD IQBAL | DIK | GPS NO 1 GILOTI | 11 Dec 1987 | 17 May 2014 | 128.85 | DIKHAN | NTS |
| 205 | 12101-4778025-1 | MUHAMMAD FAHEEM | SALIM NAWAZ | DIK | GPS BEHARI COLONY | 14 Jan 1988 | 17 May 2014 | 128.69 | DIKHAN | NTS |
| 206 | 12101-2334729-5 | NAQEEB ULLAH | ABDUL LATIF | DIK | GPS WANDA HAJBATTI | 15 Mar 1984 | 17 May 2014 | 128.47 | DIKHAN | NTS |
| 207 | 12103-6465101-9 | MUHAMMAD BILAL | ABDUR REHMAN | DIK | GPS NO.2 PAHARPUR | 06 Jan 1986 | 17 May 2014 | 128.28 | PAHARPUR | NTS |
| 208 | 12102-8779268-1 | HIZBULLAH KHAN | MUHAMMAD ABBAS KHAN | DIK | GPS NO.1 TAKWARA | 20 Apr 1987 | 05 Dec 2014 | 128.25 | KULACHI | NTS |
| 209 | 12103-7927358-5 | MUHAMMAD IRFAN | BASHIR AHMAD | DIK | GPS RANG PUR SHUMALI | 09 Dec 1984 | 17 May 2014 | 127.91 | PAHARPUR | NTS |
| 210 | 12103-5196931-7 | MUHB HUSSAIN SHAH | SYED RIAZ HUSSAIN SHAH | DIK | GPS NO. 2 DHALLAH | 24 Apr 1981 | 05 Dec 2014 | 127.84 | PAHARPUR | NTS |
| 211 | 12103-5436677-1 | MUHAMMAD SHOAB KHAN | IBRAHIM KHAN | DIK | GPS WANDA NARKANI | 04 Feb 1993 | 17 May 2014 | 127.73 | PAHARPUR | NTS |
| 212 | 11201-6609430-1 | ASSAD HUSSAIN SHAH | MASROOR HUSSAIN SHAH | DIK | GPS WANDA TALGI | 19 Sep 1989 | 05 Dec 2014 | 127.55 | PAHARPUR | NTS |
| 213 | 12101-3032309-7 | MUHAMMAD YOUNIS | MUHAMMAD RAMZAN | DIK | GPS KPK | 10 Apr 1982 | 17 May 2014 | 127.49 | DIKHAN | NTS |
| 214 | 12103-1501335-9 | ABDUR RAUF KHAN | MAAZ ULLAH KHAN | DIK | GPS KOT MASOODAN | 02 Jan 1977 | 05 Dec 2014 | 126.77 | PAHARPUR | NTS |
| 215 | 12101-3144698-1 | ISRAR MUHAMMAD | MUHAMMAD BAKHSH | DIK | GPS JHOKE GUMLA | 16 Mar 1985 | 17 May 2014 | 126.62 | PAROVA | NTS |
| 216 | 12103-1502464-7 | QAZI MUHAMMAD ABDUL WAHAB | QAZI KHIZAR HAYAT | DIK | GPS HAFIZ ABAD | 25 Feb 1986 | 17 May 2014 | 126.23 | PAHARPUR | NTS |
| 217 | 12105-0354017-3 | RIAZ ALI KHAN | ANIAZ ALI KHAN | DIK | GPS RAMAK NO 1 | 15 Sep 1990 | 17 May 2014 | 125.50 | PAROVA | NTS |
| 218 | 12101-2071864-1 | SHOAB UR REHMAN | GHULAM SUBHANI | DIK | GPS GARA RASHEED | 03 Dec 1985 | 17 May 2014 | 125.38 | PAROVA | NTS |
| 219 | 12101-8953208-5 | MUHAMMAD ZUBAIR | MUHAMMAD JAVEED | DIK | GPS BALOCH NAGAR | 20 Dec 1985 | 17 May 2014 | 124.54 | DIKHAN | NTS |
| 220 | 12101-5048995-5 | HIDAYAT ULLAH | MUHAMMAD AFZAL | DIK | GPS BUCHRI | 03 Jul 1987 | 17 May 2014 | 124.50 | PAROVA | NTS |
| 221 | 12103-6391600-7 | MUHAMMAD TARIQ | ABDUL QAYYUM | DIK | GPS ASIF ABAD | 03 Sep 1988 | 17 May 2014 | 124.29 | PAHARPUR | NTS |
| 222 | 12102-2136771-9 | IMRAN ULLAH | ABDUL WAHAB | DIK | GPS BEHLOL KHEL | 10 Feb 1980 | 17 May 2014 | 123.87 | KULACHI | NTS |

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


| | | | | | | | | | |
|-----------------|-------------------------|----------------------|-----|-------------------------|-------------|-------------|--------|---------------|-----|
| 12101-6127838-1 | MUHAMMAD MATI ULLAH | AHMAD SAEBD | 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 GHAFAR | 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 | 116.33 | PAHARPUR | NTS |
| 277 | 12103-8271339-1 | MUHAMMAD YUNAS | 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 | 12101-0924552-5 | 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 |

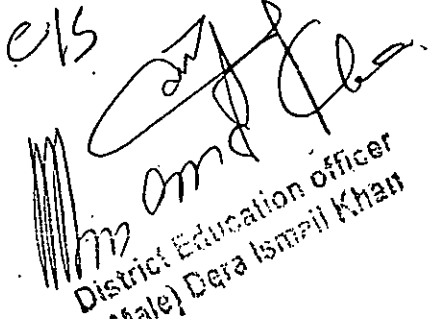
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|------|-----------------|----------------------|--------------------------|-----|------------------------|-------------|-------------|--------|---------------|-----|
| 1171 | 12102-1010340-2 | DILAWAR SHAH | YAQUB SHAH | DIK | GPS FATEH ALI | 27 Apr 1984 | 05 May 2017 | 108.57 | DARABAN KALAN | NTS |
| 1172 | 12101-4708009-7 | 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 | PAILARPUR | NTS |
| 1177 | 12102-8289497-5 | SIRAJ UD DIN | ZAHOR 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 | MUHAMMAD 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 Nov 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 |

| | | | | | | | | | | | |
|------|-----------------|--------------------------|--------------------------|-----|----------------------------|-------------|-------------|-------|----------|------------------------------------|--|
| 1194 | 12101-8047233-5 | RISHI HANS | HEERA LAL | DIK | GPS NAI ABADI KOTLA SAIDAN | 12 Jul 1996 | 05 May 2017 | 90.48 | DIKHAN | NTS | |
| 1195 | 12101-7464937-1 | SHAFQAT ULLAH | MUHAMMAD AMEEN | DIK | GPS JEEWAYA SAHI | 13 Aug 1988 | 27 Sep 2017 | 90.37 | DIKHAN | NTS | |
| 1196 | 12101-0970848-7 | SHANKAR | MANNA LAAL | DIK | GPS KHANA SHARIF | 04 Oct 1973 | 09 Nov 2017 | 88.76 | PAROVA | NTS | |
| 1197 | 12103-149344-1 | SYED MUHAMMAD TAQI ZAIDI | SYED NASIR HUSSAIN ZAIDI | DIK | GPS AMIR SHAH | 02 Feb 1977 | 22 Feb 2018 | | PAHARPUR | DECEASED SON / MEDICAL BOARD QUOTA | |
| 1198 | 12101-7976492-5 | MUHAMMAD SOHAIL | GHULAM FARID | DIK | GPS RATTA KULACHI | 05 Mar 1980 | 22 Feb 2018 | | DIKHAN | DECEASED SON / MEDICAL BOARD QUOTA | |
| 1199 | 12101-9408976-3 | KHURAM SHEHZAD | MUHAMMAD IBRAHIM | DIK | GPS AHEER ABAD | 01 Apr 1984 | 22 Feb 2018 | | DIKHAN | DECEASED SON / MEDICAL BOARD QUOTA | |
| 1200 | 12101-8202352-1 | ABDUR RASHID | ABDUR RAHIM | DIK | GPS GOMAL KHURD | 31 Jan 1985 | 22 Feb 2018 | | DIKHAN | DECEASED SON / MEDICAL BOARD QUOTA | |
| 1201 | 12101-0808292-3 | AFTAB MOHAY UD DIN | MOHAMMAD ASLAM | DIK | GPS SHEIKH RAJU | 02 Apr 1985 | 22 Feb 2018 | | DIKHAN | DECEASED SON / MEDICAL BOARD QUOTA | |
| 1202 | 12101-5595268-1 | MUHAMMAD ALI NUMAIR | SYED JAHANGIR ABBAS | DIK | G.P.S WANDA BALOCH KOKAR | 21 Mar 1992 | 22 Feb 2018 | | DIKHAN | DECEASED SON / MEDICAL BOARD QUOTA | |
| 1203 | 12102-5739990-3 | IRFANULLAH | FATEH ULLAH | DIK | GPS NO.2 KOT ESA KHAN | 04 Oct 1993 | 22 Feb 2018 | | CHODWAN | DECEASED SON / MEDICAL BOARD QUOTA | |
| 1204 | 12101-5210377-9 | 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

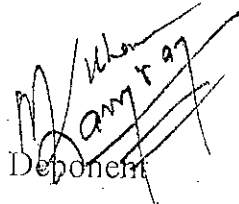
SERVICE APPEAL No. 7509/21

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