Due to summer vacations, the case is adjourned to 29,09.2022 for the same as before.

Reader

29.09.2022

Learned counsel for the appellant present. Mr. Muhammad Kamran, ADEO alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for official respondents present. None present on behalf of private respondents No. 6 to 12.

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

Previous date was changed on Reader Note, therefore, notices be issued to private respondents No. 6 to 12 for submission of reply/comments through registered post. Adjourned. To come up for submission of reply/comments on behalf of private respondents No. 6 to 12 on 25.10.2022 before the S.B at Camp Court D.I.Khan.

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

25.10.2022 Appellant present through counsel.

Kabir Ullah Khattak, learned Additional Advocate General alongwith Muhammad Kamran ADEO for official respondents present. None present on behalf of private respondents No.6 to 12.

File to come up alongwith connected Service Appeal No.7509/2021 titled "Sohail Ahmad Shah Vs. Government of Khyber Pakhtunkhwa" on 22.11.2022 before S.B at Camp Court, D.I.Khan.

(Rozina Rehman)

Member (J)

Camp Court, D.I.Khan

③.03,2022

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

Reader

29.03.2022

Counsel for the appellant present and heard.

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

Chairman Camp Court, D.I.Khan.

Appellant Deposited
Searity & Process Fee

24,25.2022

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.

(Salah-Ud-Din) Member (3)

Camp Court D.I.Khan

^

Form- A

FORM OF ORDER SHEET

Court of	• '			
	,			

Case No. 7513 /2021

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

CHAIRMAN

The appeal presented by Mr. Sana Ullah Shamim Gandapur Advocate today i.e. on 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 <u>in respect of appellant</u> is not attached with the appeal which may be placed on it.
- 4 Annexures-A, C, E and G of the appeal are illegible which may be replaced by legible/better one.
- 5- Photo state has been made on double side of the leaf which is not acceptable the same may be made on one side.
- 6- One copy/set of the appeal in file cover be submitted for Second Member.
- 7- Memorandum of appeal may be got signed by the appellant.
- 8- Appeal has not been flagged/marked with annexures marks.
- 9- Wakalat nama is unattested.
- 10-Annexures of the appeal may be attested and affidavit may be got attested by the Oath Commissioner.
- 11-Appeal may be page marked according to the Index of the appeal.
- 12- Approved file cover is not used.

Mr.Sanaullah Shamim Gandapur Adv.

- 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. 1357 /S.T,
Dt. 19/07 /2021

REGISTRAR SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Respected Gir
The addresses of appellant and hespondents are in a cursdance with the Senice Rules as mentioned in a cursdance with the Senice Rules as mentioned in Seniority dist. Copy of departmental appeal is in Seniority dist. Copy of departmental appeal is annexed. All annexises are Sentified one Set of legible photocopies are now heatified one Set of legible photocopies are now heatified. One Set of Segon-Seniorial member is flagged and attached. In Second member is duly during. Certificate is sualat nama in duly during. Copies of Responsable attached with the appeal. Copies of Responsable attached with the appeal. Copies ferein deuts are attached.

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

No		/S.T,
Dt.	•	/2021

REGISTRAR SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

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

Respected Sv.
Objection are ractified

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

novt of Case Title: 5# CONTENTS This Appeal has been presented by: M. Anway Whether Counsel/Appellant/Respondent/Deponent have the requisite documents? Whether appeal is within time? Whether the enactment under which the appeal is mentioned? 5 Whether the enactment under which the appeal is filed is correct? Whether affidavit is appended? Ú Whether affidavit is duly attested by competent 7 Commissioner? Whether appeal/annexures are properly paged? 8 Whether certificate regarding filing any earlier appeal on the 9 subject, furnished? 10 Whether annexures are legible? Whether annexures are attested? Whether copies of annexures are readable/clear? 13 | Whether copy of appeal is delivered to AG/DAG? Whether Power of Attorney of the Counsel engaged is attested 14 and signed by petitioner/appellant/respondents? 15 Whether numbers of referred cases given are correct? Whether appeal contains cutting/overwriting? 16 17 Whether list of books has been provided at the end of the appeal? Whether case relate to this court? 19 Whether regulsite 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? Whether index is correct? 23 24 | Whether Security and Process Fee deposited? On Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has 25 been sent to respondents? On Whether copies of comments/reply/rejoinder submitted? On 26 Whether copies of comments/reply/rejoinder provided to 27 opposite party? On

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

Name:

Signature: Dated: . Anwas Awan ASC

03/08/2021

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

Appeal no. 7513 of 2021.

Sami Ullah

VS

Govt Of KP& Others

INDEX

No.	Particulars	Annexure	Pages
1	Appeal		1-5
2	Copy appointment order	· A	6-8
3	Copy of Regularization Order	В	9-11
4	Copy of Office order Dated 04-06-2020.	C	12
5	Copy of orders dated 24-06-2020	D	13
6	Copy of Seniority List	E	14-15
74	Copy of Departmental Appeal	F	16-19
8	Wakalat Nama	G	20

Your humble Appellant

Sami Ullah Through Counsel

Mohammad Anwar Awan Advocate Supreme Court.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

	-	
Service Appeal	No	/2021
ppoc.	- : : -	,

SAMI ULLAH PST GPS PAROVA NO 5. 5/0

Gadir Baksh R/o Parova Tehsil Parova D. I. (Chan (Appellant))

Khyher Pakhtukhwa Service Tribunal

VERSUS

Dated 15/7/702

- 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.

Huran

MA THAT SUPPERING COURT

Priori, P.I.EMAN.

graph of the second of the sec

Filedto-daÿ

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

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

SHE DI ISONYI LEHDATT I OZILLIR (EDIO) WATE BESHDUN

- R HIZBULLAH KHAN GPS NO.1 TAKWARA DISTT: D.I.KHAN
- A. .. MUHIB HUSSAIN SHAH GPS NO. 2 DHALLAH DISTT: D.I.KHAN
- ASSAD HUSSAIN SHAH GPS WANDA TALGI DISTT: D.I.KHAN
- //. 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 RESPONDANTS TO REVISE/CORRECT THE SENIORITY LIST ISSUED BY THE OFFICIAL RESPONDENTS AS PER DATE OF INITIAL APPOINTMENT AND PROMOTE THE APPELLANT AS PER THEIR SENIORITY ALONGWITH BACK AND FUTURE BENEFITS.

Respectfully Sheweth,

- 1. That Appellant is appointed as Primary School teacher through NTS on 17-05-2014 while Respondent No 11 to 17 are appointed as PST vide order Dated; 05-12-2014 on contract basis. Copy of Appointment Orders are Annexure A.
- 2. That the Appellant is Qualified PST and after his appointment, has been serving the Department with due diligence, utmost care and devotion, always tried to his best and has spotless service record. The Appellant and other were regularized on 10-03-2018. Copy of Order Dated; 10-03-2018 is Annexure B.
- 3. That on 04-06-2020, the concern District Education Officer vide Letter No. 11728 has sought guidance for preparing of seniority List of PSTs, the mechanism was provided by the Assistant Director (Estab;) Elementary and secondary Education Department Khyber Pakhtunkhwa (Respondent No. 04) then a Seniority list was prepared by Respondents. Copies of Office order Dated; 04-06-2020 and Office order Dated; 24-06-2020 and seniority list are Annexure C, D & E.
- 4. That on attaining knowledge on 20-03-2021, the appellant along with others has preferred departmental Applications/ Appeal through proper channel and being senior employee sought his promotion on the basis of his seniority with effect from their initial appointment Dated; 17-05-2014. Copies of appellant Departmental application/Appeal is Annexure F.
- 8. That feeling aggrieved from above said action appellants are constrained to approaches this honorable court on the following amongst other:

GROUNDS:

- That the action of respondents is against facts and law, ultra vires, without Jurisdiction and against the Khyber Pakhtunkhwa Employees of Elementary and Secondary Education Department (Appointment and Regulation of Services) Act 2017 as well as Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989.
- 2. That as per rules framed by the government of KPK and also Regularization Act 2017, it is clearly mentioned that seniority of teachers would be reckoned from Section 4 of ibid Act but respondents without any lawful authority issued seniority list on its whims and wishes.
- 3. That as per appointment Order of petitioner issued on 17.05.2014, he was appointed in teaching cadre on terms and conditions mentioned in the Order from the date of their taking over charge but surprisingly the private respondents who were appointed on 05.12.2014, are placed senior to the petitioner on the basis of their marks which is totally against the policy and terms and conditions mentioned in the appointment order.
- 4. That while regularizing the petitioner and others Primary School Teachers vide Order dated: 10.03.2018 it was termed that their seniority shall be determined on the basis of their continuous service in cadre so appellant has took the charge of the post in May 2014 while private respondents took the charge in the month of December 2014 so appellant by efflux of time is senior to the private respondents.
- 5. That it is also evident from the regularization order dated: 10.03.2018, the PSTs appointed on 17.05.2014 are mentioned firstly and thereafter PSTs appointed on 05.12.2014 are mentioned in ibid Order which clearly reflect that the department has issued seniority of all PSTs appointed through the above-said orders.

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

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

YOUR HUMBLE APPELLANT

/06/2021

Soulley

SAMI ULLAH

SANA ULLAH SHAMIM GANDAPUR Advocate supreme Court

of Pakistan D.I.Khan.

KANEEZ BATOOL Advocate High Court D.I.Khan

AFFIDAVITE

I, SAMI ULLAH PST GPS PAROVA NO 5. 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 2(01-2693445-1

SANA ULLAH SHAMIM GANDAPUR Advocate supreme Court

of Pakistan D.I.Khan.

-5-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Corrigo Approal No.	A Property of the Control of the Con		/2021
Service Appeal No		 <u> </u>	12021

SAMI ULLAH VERSUS GOVT OF K.P.K etc.

BOOKS REFERED;

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

VERIFICATION; CERTIFICATE.

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

Sami ullah



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



APPOINTMENT

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of <u>PST</u>, 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	Soll No NAME FATHER'S NAME		CNIC SCORE		PLACE OF POSTING	UNION
	ı 	, , , , , , , , , , , , , , , , , , , ,	DERA ISA	IAIL KHAI	, ,	1 1031140	COUNCIL
', 	1760062	CINITALIS	QAYYUM NAWAZ	12101- 6286930-3	93.5	GPS DARWESHA	CHEHKAN
	1760177	B ASHIR MHMAD	MUHAMMAD AFZAL	12 <u>10</u> 1- 8038430-1	97.19	GPS GARA BALA	CHEHKAN .
	1760752	NAVEED AHMAD	NAZIR AHMU	12101- 2041550-9	109.58	GPS CARA HASSANI	CHEHKAN
	760368	MUHAMAMD RAMZAN	SHER ZAMAN	12101- 7034423-1 .	116.35	GPS GARA MORE	CHEHKAN
	1760733	RAHMATULIAH	SARFARAZ	12101- 5709320-3	95.33	GPS HAINDAN	CHEHKAN
		MAZHAR IQBAL	MUHAMMAD [QBAL	12101- 4536514-5	87.57	GPS JARDI SINDH	СРОЗНКАМ
	1761263	MUHAMMAD ABBAS	MUHAMMAD RAMZAN	12101- 1989179-5	109.62	GPS JEVAYA	CHEHKAN
	1760735	MUHAMMAD SALEEM	KARIM BAKHSH	1210) - 0972120-3	.117.46	SAIII GPS NO. 2 POTA	CHEHKAN
	1762690	MUHAMAD NADEEM AKITTAR	MUHAMMAD - ASLAM	12101- 3818810-5	87.92	GPS NO. 2 POTA	СПЕНКАМ
	1764200	RAB NAIVAZ	GUL SHER	12101- 7539649-3	95.9	GPS NURANG	CHEHKAN
	176-1043	ABDUL BASAT	MAULVI. GHULAM HASSAN	12101- 3958240-7	116,49	UTRA GPS SHERU KOHNA	СНЕНКАМ
_		SANA ULLAH	QADIR	12101- 9636197-3	88,45	GPS-SIKANDAR SHUMALI	CHEHKAN
		SHAHZADA MUHB ULLAH	ASILAM	12101- 3E37795-9	92.31	CEGION	CHEHKAN
	67 UUQQQX3 4L	MUHAMMAD ALTAF KHAN	UMAR HAYAT	12101- 7309163-5	98.29		CHEHKAN

Page 1 of 33

M. A morar Awar

S.No	Rolf No	NAME	FATHER'S NAME	CNIC	SCORE	PLACE OF POSTING	COUNCIL
618	1760(71	OBAID ULLAH	KHALIL UR RAHMAN	12101- 0899685-3	124.87	GPS NO.3 PAROA	PAROA
619.	-176267 <i>6</i>	MUHAMMAD KHALID	SAIF ULLAH	1210J- 1005269-1	87.08	GPS NO.+ PAROA	PAROA
630.	1764238	SHAII NAWAZ	RAB NAWAZ	12101 - 0930161-1	92.85	GPS NO.5 PAROA	PAROA
621.	1761938	SAMI ULLATI .	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

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

Page 31 of 32

Advoice supreme von

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

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

Endst No.

Dated DIKkhan the 17-05-2014

Copy forwarded for information and necessary action to

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

istrict Education & DIKHAN

Page 32 of 32

_B-



Regularization Order PST /(NTS Adhoc) (2018) Dera Isinail Khai



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
ł	1760003	MUAHMMAD SHAHID	93.5	GPS DARWESHA .	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017 No. 15408-14	12101- 6286930-3
2	1760477	BASHIR AHMAD	97,19	GPS GARA BALA	Chebkan	No. 7135-7765 Dated 17-05-2014	Dated 02-06-2017	8038439-1
3	1760752	NAVEED AHMAD	109.58	GPS GARA HASSANI	Chehkuu	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 2041550-9
4	1760368	MUHAMAMD RAMZAN	116.35	GPS GARA MORE	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 7034423-1
5	1760733	RAHMAT ULLAH	95.33	GPS HAINDAN	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 5709320-3
t)	1760335	MAZHAR IQBAL	87.57	GPS JANDI SINDII	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 4536514-5
7	1762690	MUHAMMAD NADEEM AKHTAR	87.92	GPS NO. 2 POTA	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 3818810-5
8	1764200	RAB NAWAZ	95,9	GPS NURANG UTRA	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 7539649-3
9	1764043	ABDUL BASAT	116.49	GPS SHERU KOHNA	Chelikan	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 SHUMAL)	Chehkan	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 9636197-3
1 F	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- 8937611-7
14	1763381	MUHAMMAD JAVED KHAN	98.86	GPS CHAH BAREY WALA	DD# I	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 KUAN	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. I THOYA FAZIL	DD#2	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 4061211-7
18	1760921	AFNÁN 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 DHAIPAN WALI	Deewala	No. 7135-7765 Dated 17-05-2014	No. 15408-14	12101.
23	1760648	MUHAMMAD ILYAS	107.04	GPS CHAH MALIK WALA	Deewala	No. 7135-7765 Dated 17-05-2014	Dated 02-06-2017 No. 15408-14	0936562-1 12101-
24	1760028	MUHAMMAD EHSAN	105.62	GPS CHAH MALIK WALA	Deewala	No. 7135-7765 Dated 17-05-2014	No. 15408-14	7076340-5 12101-
25	1760808	ZUBAIR AHMAD	103.41	GPS MADNI : TOWN	Deewala	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	0940626-9 12101- 3119854-5

Page 1 of 32

() N. 1

M. A number Aware

Dilikutan



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

· Sr	I	RollNo		Name	Total Marks Jout of 200]	School	UC	Appointment order No and dated	Extension order No and dated if any	CNIC
523	-	1760636	HIE	AYAT ULLAH	124.5	GPS BUCHRI	Naivela	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 5048995-5
524	-	1763478		DAMMAD WAW.	98.29	GPS GARA ASHIQ	Naivela	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 5192880-1
525		1760936	ВА	SHIR AHMAD	111.75	GPS GARA GHUNS SHAH	Naivela	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 0923553-7
520	5	1760396	<u> </u>	AUKAT IQBAL AN	105.03	GPS GARA GHUNS SHAH	Naivela	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 3535761-3
52	7	1760536	SHOAIB UR REHMAN		125.38	GPS GARA RASHID	Naivela	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 2071864-1
52	8	1762569		BDUR RASHID	102.87	GPS GURMANI	Naivela	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2012	12101- 5364225-9
52	9	1760744		UHAMMAD RAHIM	123.29	GPS JATTA	Naivela	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 0991881-9
53	0	1760725	-	BOUL QADIR	112.09	GPS JATTA	Nnivela	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 5911194-3
5	31	1761905	١.	UHAMMAD AMKAN	104.43	GPS JATTA	Naivela	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12105 0344435-5
5	32	1760806	·H	AJI MÜHAMMAD	98.28	GPS JH; MASSU	Naivela	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 7338172-9
5	33	1760041	<u> </u>	IUSHTAQ AHMAD	116.4	GPS KHANA SHARIF	Naivela	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 0924424-5
	534	1760268	A	MAN ULLAH	86.77	GPS BABAR KACHA	Ригоа	No. 7135-7765 Dated 17-05-2014	No 15408-14 Dated 02-06-2017	12101 9678214-7
:	535	1763630		SHULAM ABBAS	88.23	GPS BABAR PAKKA	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 0413474-5
	536	1762943		MUHAMMAD AAMIK	83.89	GPS BABAR PAKKA	Рагоа	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 4243356-7
	537	1760642		MUHAMMAD RAMZAN	85,4	GPS BASTI MALIK MIR	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101 - 1470463-1
	538	1760457		MUHAMMAD SHÁFQAT	87.77	GPS BHIRK!	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 2526976-1
	539	1763977		MUHAMMAD IMKAN	85.37	GPS HAZARA KACHA	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 7582792-7
	540	1760566	;	HAMAD ULLAH	89.18	GPS JH; SALAUD DIN	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-1-1 Dated 02-06-2017	12101+ 6121552-1
	541	1763279	,	GHULAM MURTAZA	97.63	GPS NO.1 PAROA	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 6724482-3
٠	542	176059:	2	GHULAM YASIN	100.4	GPS NO.2 PAROA	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 2858944-9
	543	176040	1760407 INAM ULLAH		86.53	GPS NO.2 PAROA	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 2356055-5
.	544	176267	762676 MUHAMMAD KHALID		87.08	GPS NO.4 PAROA	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 1005269-1
	545	176/123	1764238 SHAH NAWAZ		92.83	GPS NO.5 PAROA	Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 0930161-1
	546	176193	88	SAMI ULLAH	84.6		Paroa	No. 7135-7765 Dated 17-05-2014	No. 15408-14 Dated 02-06-2017	12101- 2693445-1
	547	176056	53	RASHEED AHMAL	D 86.0:	GPS THAT SOLAN	Paroa	No. 7135-7765 Dated 17-05-2014 No. 23048-	Dated 02-06-2017 -	
	548	176049	93	NAIMAT ULLAH	83.4	GPS CHEHKAN	Chehkan	23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101 - 8224182-4
	549	9 176090	01	HAFIZ MUHAMMAD TAHIR RASHID	100.2	GPS GARA AHMAD	Chelikan	No. 23048- 23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101- 4607199-9
	550	0 17635:	22	AŞIF NAWAZ	85.2	GPS GARA DAD	Chehkan	No. 23048- 23274/PST(NTS) doted 05-12-2014	No. 4921-5138 dated 06-03-2018	12101- 4701491-3
	55	1 17602	27	MUHAMMAD BILAL	111.0	67 GPS GARA MORE	Chehkan	No. 23048- 23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 96-03-2018	13101- 7201439-7
	55	2 17636	14	MUHAMMAD YASIR KHAN	94.9	5 GPS NO. 1 POTA	Chehkan	No. 23048- 23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101- 4119138-3
	5.5	3 17631	1763177 TAHSEEN ULLAH		LAH 84.31 GPS SHERU KOHNA		Chehkan	No. 23048- 23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	2104- 5027815-5
	55	54 17604	1760400 MUHAMMAD . QASIM MUDDASSIR		95.4	ABAD	DD# 1	No. 23048- 23274/PST(NTS) dated 05-12-2014	No. 4921-5138 dated 06-03-2018	12101- 5719694-9
. •	55	55 17606	549	NAJAM ALI	108.	GMPS CHAH SARWAR NOW AT OPS CHAH BARAY WALA	ĐĐ# I	No. 23048- 23274/PST(NTS) dnted 05-12-2014	No. 4921-5138 dated 06-03-2018	12101- 0919805-9

Page 16 of 32

M. Malban Avrons M. Malban Avrons Malanan Sapiena See S Kestingan



MINORITY QUOTA

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

ئۇ	Sr	RollNo	Nume	Address	Total Marks Jout of 2001	School	υc	Appointment order No and dated	Extension order No and dated if any	CNIC
	l	2332000995	RISHI HANS	DIKhan	90.48	GPS NEW ABADI KOTLA SAIDAN	Kotla Saidan	No. 12081-12231 dated 05-05-2017		12101- 8047233-5
	2	2331000974	SHANKAR _	DiKhan	88.76	GPS KHANA SHARIF	Lunda Sharif	No. 25757-67 dated 09-11-2017		12101- 0970848-7

TERMS & CONDITIONS

- The regularization will not be in favour of those, who have not taken over charge or has remained absent from duty
 or resigned from service and also not for those who are under disciplinary proceedings.
- 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.
- 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.
- 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.

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

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

Copy forwarded for information and necessary action to the: -

Dated DIKhan the 10/03 /201

- 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.
- 3. All Assistant Sub Divisional Education Officers (M) Circles in District DIKhan.
- 9. All Head Teachers Concerned.
- 10. Teachers Concerned.
- II. Master File.

DISTRICT EDUCATION OFFICER (MALE) DERA ISMAI KHAN o o construction

DERAJISMAE KEESS

Endsr: No. 11. 728

Dated Dakening new 2

Τ¢

he Director

Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar

Subject:

GUIDANCE REGARDING SENIORITY DIST OF PST

Respected Sir_{son} ,

It is stated for your kind information that a letter bearing No. 34832 dated 13/11/2015 on the subject cited above has been submitted to your good office but no guidance in provide this regard till yet.

It is requested that seniority list of PST (NTS) is under process-of-indiating mon

- 1 Whether the seminity listic updated according to merit score of the teachers or from their date of taking over charge and then consage.
- 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 determined their Senitority on cotherwise.

DISTRICT EDUCATION OF FICER (MALE) DERATISM DE KHANE

Endsr: No. // 729-33/

Dated: 04 1.06/2020

Copy for information to the:-

- 1. PA to Director Elementary & Secondary Education Chybrid Pakhton Enterview and Pakhton Education Chybrid Pakhton Chybrid Pak
- Deputy District Education Officer (Male) DIKhan
- 3. All the SDEO's (Male) in District Dera Ismail Khan
- 4. PA to DEO (Mafe) DIKhan.

DISTRECTION OF THE



(88)





DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR.

No. 6416 /F. No. Appeal D I Khan Dated Peshawar the 2/1/6/2020.

To,

The District Education Officer (M) D I Khan.

Subject: 1

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

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

Copy forwarded to the:-

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

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

M. A refer Awan.

មិ.ប៉ាប់ជា



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)
- 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	` = `	PRESENT PLACE OF POSTING.	DATE OF BIRTII	DATE OF TAKING CHARGE	SCORE	TEHSIL	METHOD OF APPOINTMENT	REMARKS
	12101- 8104636-5	SHAH JAHAN	GUL DAD	DIK	GMPS JALAL BORING	17 Mar 1961	01 Feb 1979		DIKHAN	DIRECT APPOINTMENT	
7277	12101- 8000082-7	AZIZ ULLAH	SAAD ULLAH	DIK		20 May 1961	:26 May 1982		DIKHAN	DIRECT APPOINTMENT	
22 h	12103- 1490966-3	MUSHTAQ AHMAD	RAB NAWAZ	£ 10 £ 1.9		10 Apr 1962	16 Dec 1982		PAHARPUR	DIRECT APPOINTMENT	
4		ALLAH NAWAZ	MUHAMMAD NAWAZ	DIK	GPS KALA GORH	10 Sep 1962	i17 Nov 1983		PAHARPUR	DIRECT APPOINTMENT	1
3.5	12013- 3841194-3	GHANI-UR-REHMAN	SHER DIL	DIK	GPS NO.1 PAHARPUR	01 Nov 1962	20 Dec 1983		PAHARPUR '	'DIRECT APPOIN'IMENT	
	12101- 10961741-7	ASEEM KHAN	AZAM KHAN	DIK	GPS GILOTI	01 May 1963	19 May 1984	,	DIKHAN	DIRECT APPOINTMENT	٠
7.77.47.7	12101- 0965650-3	MUHAMMAD RASHID	GHULAM JEELANI	DIK	GPS KOKAR GHARBI	10 Sep 1961	05 Sep 1984		DIKHAN	DIRECT APPOINTMENT	
*** 'Y	12102- 2150050-7	ABDUL SAMAD KHAN	ABDUL GHAFAR		GPS BASTI BALOCHAN	28 Apr 1961	17 Oct 1984		DARABAN KALAN	DIRECT APPOINTMENT	
- 4	12101- 0939011-5	ABDUI, 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	אומ	GPS SAID ALIYAN	15 Apr 1965	17 Oct 1984		PAHARPUR	DIRECT APPOINTMENT	

Pat. A propose stancers

L	S	1
1	-	J
•	<u> </u>	

			•		•					•	
		,							•	•	
					•						
•										•	•
12101-		a superarum er sen se		CODO 1111 41 4 4 1 T 114 1 4	1 7 E-L 1007	'05 Dec 2014	85.03	DIKHAN	NTS		;
3815127-9	MUHAMMAD ISHFAQ	_ M∧LKA -¬	DIK	GPS HIMMAT WALA	13 Feb 1987			DARABAN			
827 2450301-9	IKRAM ULLAH	KHDUA BAKHSH	DIK	GPS KOHAWAR	24 Apr 1988	17 May 2014	85.02	KALAN	NTS	. 	!
828 2131184-5	MUHAMMAD ISMAIL KHAN	AHMAD NAWAZ KHAN	DIK	GPS KOT MUSA	04 Apr 1982	17 May 2014	84.97	DARABAN KALAN	NTS.		
12101-	MUHAMMAD NUMAIR	MALIK INAYAT ULLAH	ĎIĶ	GPS KAT SHAHANI	02 Feb 1985	117 May 2014	84.78	PAROVA	ints	ا د	
3610423-7 12101-	MOHAMMAD YAQOOB	MUHAMMAD RAMZAN		GPS SARDARAY WALA	15 Mar 1989	17 May 2014	84.61	DIKHAN	ZTN-	ि ।	\$2
5736347-3 12101-	MUHAMMAD TAQOOB			<u>.</u>				· 	NTS	1=3	Amos office,
3 7 3 426934 <u>45-1</u>	SAMI ULLAH	QADIR BAKHSH	DIK	GPS PAROVA NO 5	02 Dec 1990	17 May 2014	84.60	DARABAN		1756	, iii
832 2 12104- 832 2 33355116-7	MUHAMMAD AMJAD	ALAM SHER	DIK	GPS GARA RAMZI	01 Jan 1994	17 May 2014	84.60	KALAN	NTS	1 75	32
5) - 3 12101- 3 833 - 3 4611793-9	BASHIR AHMAD	MUHAMMAD RAMZAN	7 DIK	GPS NO 3 KECH	07 Fcb 1981	17 May 2014	84.37	DIKHAN	צדא	8	e
12101-	ABDUL QAYYUM	HAQNAWAZ	A.A	GPS RAMAK NO I	20 Apr 1984	17 May 2014	84.32	PAROVA	NTS	N.C.	
4466515-7 12101-	TAHSEEN ULLAH	FAZAL AHMAD	P-951	GPS NO. 2 POTA	14 Aug 1992	05 Dec 2014	84.31	DIKHAN	NTS	•	
45027815-5 12102-	TARISEEN OLGAN		ir (i) and) Daniel ir 1		1		ļ	DARABAN	NTS		
5507317-1	MUHAMMAD TUFAIL	'ABDUL LATIF	DIK	GPS SHAH ALAM	.08 Jan 1993	17 May 2014	84.08	KALAN		<u> </u>	
837 5753979-5	INTIZAR HUSSAIN	MUKHTIYAR HUSSAIN	DIK	GPS NAIVELA	25 Dec 1991	05 Dec 2014	83.96	PAROVA	NTS		•
838 12101- 838 6888027-9	ABDUR REHMAN	HOTE KHAN	DIK.	GPS NO 2 JK/MOHANA	01 Mar 1984	17 May 2014	83.92	DIKHAN	NTS		
12101-	MUHAMMAD AAMIR	MUHAMMAD RAMZAN	DIK	GPS BABBAR PAKKA	16 Mar 1990	17 May 2014	83.89	PAROVA	NTS		•
4243356-7 4 840 12101-	MAZHAR HUSSAIN	ASHIQ HUSSAIN	DIK	GPS MURYALI	07 Apr 1989	05 Dec 2014	83.85	DIKHAN	NTS		
3594168-7	MAZHAR NOSAN	13 TO 33 AN	- 33	<u></u>		<u> </u>		-4 ·	NTC		1
9261062-7	GHULAM SAMDANI	GHULAM RABBANI		GPS JAVID NAGGER	25 Feb 1981	17 May 2014	، ، ،	,DIKHAN	NTS	<u> </u>	•
842 12101- 2531840-9	MUHAMMAD IRFAN	ALIAH WASAYA		GPS WANDA BALOCH KOKAR	20 Feb 1989	'05 Dec 2014	83.71	DIKHAN	NTS		1
12101- 843 9168133-3	MUHAMMAD SALEEM	YASEEN	DIK	GPS AZIZ ABAD	05 Jan 1989	05 Dec 2014	\$3.68	DIKHAN	NTS .		
12102-	SYED MUHAMMAD	ABDUL MANAN SHAH	DIK	Ç GPS BHUKK!	14 Apr 1991	17 May 2014	83.64	DARABAN KALAN	NTS	•	
4362397-9 112101- 845	FARHAN SHAH MUHAMMAD ISHAQ KHA	NI AMAN IRI AH VHAN	سپي شتاغ -	GPS DHANDLAH	01 Mar 1981	05 Dec 2014	83 62	PAROVA	NTS	• • •	
*** ** £** 0992030-7			, J. J. J.	•	:			••	.* . *	•	•
. \$46 12101- . \$653347-5	ZIA UR REHMAN	ATTA UR REHMAN	DIK	GPS IJAZ ABAD	.01 Oct 1989	05 Dec 2014	83.59	DIKHAN	NTS		
847 12101- 8224182-1	NAIMAT ULLAH	MCHAMMAD AMFER	DIK	GPS NO. UHAJI MORAH	06 Jun 1984	05 Dec 2014	83 49	DIKHAN	NTS		
(210)-	SHAH BARAN	SRAHJAHAN	DIE	GPS SHEIKH YOUSAF	01 May 1979	05 Dec 2014	83.48	DIKHAN	NTS		

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

Rodellog Statement

Subject: Appeal against the Seniority/promotion order of PST (BPS-12) 1999 ST (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 juriors) of six months was also maintained in both cases: awarding increments and implementing purmanency 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 ago shall rank senior to the younger one.

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

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

M. Anwar Awan

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. A mun Aman D.L. Man Supleme Cour It was clearly stated that Seniority/promotions orders will be designed accordance to "THE KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, SENIORITY/PROMOTION &TRANSFER) RULES, \$2989 and KP assembly act 2018 but in practice they are completely ignored.

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

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

Date: 15-03-2021

Yours obediently,

PSTs (List attached)
District: D. I. Khan

Advocate Supreme Court

List of 0345. 9373705 . 1/2 Jose (3P5 PST While) (ع امراد صبى PST و وجي سعرام وال م عرام 133. 0346-7878562 SLIJ GPS PST JJULION (3 0315.9839260 Us - while GPS PST Harling (6) 0343-7980866 JULY BER 6iPS, PST , SULVEY (5 6) مردناوم PSF PSF مرابع 03444090374 7) ساه فار PS PST مهردس م 365361 و 342 GAS PST UM FILL (8 03459849865 03448596979 . KJA GPS PET were 19 ال کوار فالس بی فالس گشگری و ار آ ال محمد اشال ۱۲۶ میمهای رسی و از به فرواز ا محل گوزمان وسی فر می وسی می فرود از این فرواز ا Gul 3ms Ishal. helpon Q. Mush. (ال الما برت، قيلة بن سادك الم المحر في إلى رمغى درين على المها الماليال الماليال منها الماليال منها الماليال الماليال منها الماليال منها الماليال منها الماليال منها الماليال منها الماليالية الماليالية الماليالية المالية الم Major. محدد ا معف بي له زمي ملالات مريالي CAPS (PS7) 3452434 July CAPS (PS7) 313-2452434 July CAPS 9 حاجی اجہبر Almagt. 0343-2996815 - 1/100 pm M (Q) 03459834132 . jel 3/1 ى مى_{خىرى}ىلى Bile! 03401957652/ UNO Pino ے محد مالک Jun 0315-9467336. Urill في ورانها ل (19):0: 0345-9872124 2 1020° Ungle 3 10 10 10 months of 183. PST Jobe 24 11 وق اخترضير ٢٦٠ في نيأي فيوك اليمي روا الم 19, 3/3/3/3/3 PST 23 6 26 11 F 6 PM (27 // الماري في لا الله المرادة المرادة . المحك أفدامحد (29) مهراصفر ال جمليان مكواني سترابي 11 221-30

جی تی الیس مبرکیہ

الآ- امان الكرم.

AL 10 32

All and Inview

باعيث تحريرآ نك مقدمه مندرديه بالاعوان ميس الي طرف واسطع يروى وجوابدى برائة بيشي يا تصفيه مقدمه بمقام في كريرا المؤد ليدك بدويل شرائط بروسل مقرركيا ب كديل مروش برخود بالمدرية عنز إرخاص روبروهدالت عاضر موتان مول كالماور بروتت إارب جائي مقدمه سوسوف کواطلار ادیکر صافر عدالت کردل گاه اکریش برمظیر حاضر ندوها ورمقدمد عری غیرما فری کی دجدے کی طور پرمیرے : خلاف بوگیا۔ توصاحب میسوف اسك كالمراز دسدارت مول كر فيزوكل صاحب موسوف مدرمقام كجرى كعاادة كاميك يا كجرى كادقات بيلي با في يارود تعطيل بروك اكرن ذمددارند اول کے میز دیک صاحب موسوف صدرمقام کیری کے علاوہ کی جگہ یا کیری کے اوقات سے پہلے یا پیچے یابروز طیل میروی کرنے کے ذسردارند ہول، کے اور مقدمہ صدر کی بری کے ملاوہ اور جگہ ساعت ہونے یا بروز العالم اللہ کی بری کے اوقاد سے کا مے چیجے پیش ہونے برمالم کوکوئی نقصان کا نیاتو آس کے دی۔ واد یا آس کے واسط کی معاوضہ کے اوا کرنے یا مخاشدوالی کرنے کے بھی موسوف فردوار ندوں سے مجھوکل ساختہ و وافتہ صاحب موسوف مثل کروہ دَاست ورمنطوروتي ل موكا ورصاحب موصوف كومنى دعوى ما جواب دعوى يا ورخواست اجرائ وكرى ونظر فاني ابيل محرافي وجرش فاست يروش تفاوته مدين كريدنيكا الما المهار مولاً الورك عم يا وكرى الرائ الوروهم كاروب وسول كرف ورسيدوية الدوائل كرف الدور جرم كم مان دين الأكرى الراق في بالمان المسوالي المان المسوالي المان المسوالي المان المسوالي المان المسوالي المان المسوالي المسالية ماند است اقبال دوی کاسی افتیار اوگاساور بصورت مقرر وست تاریخ بیشی مقدمه فیکره ورون از مجمری صدر پیروی مقدمه فرون او تال وایش این من مديامنسوني والري يكطرف بادرخواست يحم امتا في يا ترق يأكراق ري أل از فيعلدا جرائدي أكرى بعي صاحب موسوف كويشرط ادا كي عليم، وثنان يي وي كالتعييار وي كالتعييار وي اور تهام ساخند پرواخدنصاحب موسوف مثل كرده ذات خود مظوروتهول، وفي اور بصورت المرورت صاحب موسوف كويهمي احتيار وكاكر مقدر مرفروه يااسيكسي جزو كى كاروائى يابسورت دوخواست فظر فانى ايلى يا كلمانى ياد يكرموالمد تقد مد يكوره كى دوسر عدك بايير شركوا بين بجائيا البين بمرا القروكري ساورا بيستشير فالون كو كى برامرين وى اورويها القيارات عامل بول مير عيدما دسيه موسوف كوه المل إن اور دوران مقدمه يل جورة وبرجاند الوام يزيكا ووصاحب وروف كائن اوكا بحرصا حب موسوف كويورى فيس تارخ يوشى يها ادان كرول كالفروس المراحب موسوف كويوراا فقيار موقاكه واحقدم كى وى شكر بي ادرايي مورت الن مراكوني مطالب من مكاصاحب موصوف ير برنظاف فين وا الداؤالت المكهديا المستدي مضمون وكالهن ناميش لبي ب-ادراح كالررسمجوليا باورمنظو M. Amuar Awan supidine Lours Dannan

SERVICE APPEAL No. 7509/21

Syed Sohail Ahmad Shah Gillani & 33

Government of KPK

<u>Index</u>

S No.	Description of documents	Description of annuexure	Page No.
01	Reply of service		1-4
02	Annexture		5-12
03	Affidavit		/3
04	Authority		14

S.A.no: 75/3/2021 Sami-ullah.

District Education Officer (Male) Dera Ismail Khan

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

SERVICE APPEAL No. 7509/21

1. Syed Sohail Ahmad Shah Gillani & 33 V	VS Government of KPK
•	VS Government of KPK
3. Gulzar Khan	VS Government of KPK
4. Zahir Hussain Shah	VS Government of KPK
5. Saṇa Ullah V	VS Government of KPK
6. Nisar Mehmood Khan V	VS Government of KPK
7. Mazar Iqbal V	VS Government of KPK
8. Habib Ur Rehman V	VS Government of KPK
9. Abdul Latif V	VS Government of KPK
10. Syed Gulam Abbas V	VS Government of KPK
11. Kifayat Ullah V	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
	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
20 Muhammad Zarif	VS Gov mment of KPK
27. Rehmat Ullah	VS Government of KPK
28. Abdul Ghafoor	VS Government of KPK
29. Haji Ahmad	VS Government of KPK
- 30. Inidad Hussain	VS Gövernment of KPK
31. Akhtar Munir	VS Government of KPK
32. Abu Nasar Muhammad Parsa	VS Government of KPK

X) Elelron

COMMENTS ON BEHALF OF RESPONDENTS.

PRELIMINARY OBJECTIONS

- 1. That the Departmental Appeal is Badly time barred,
- 2. The respondent no. 5 issued the seniority list of PST Teachers on 04-06-2020 where as

the appellants filed the departmental appeals on 15-03-2021. So the appellants have no

cause of action and locus standi.

- 3. that the appellants has not come to the honorable tribunal with clean hands.
- 4. That the appellants has filed the service appeals on malafide objectives.
- 5. that the instant appeal are against the prevailing laws and rules.
- 6. That the appeal are barred by the doctorine of 1^{α} ches.
- 7. That the instant appeal are illegal and against the facts.
- 8. That the service appeal are not maintainable in its present form.
- 9. That the appellants has concealed the material facts from the honorable tribunal.

10. That the appeals are badly time barred.

 $\frac{1}{b|t|}$

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

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

- 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

Mmara ha

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

Respondent No. 6 SDEO (M) D I Khan

Respondent No. 4

Peshawar

Assistant Director Estab KP

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. Schail along with 33 being Same on Kamran . Khan and indentical nature.

ob 8. 2022 Moiss

Wettell subject to wecessary convertionsattachment

of annex times and affordavit .



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

Tell: 09669280128- 09669280131. Email: <u>emisdik@gmail.com</u>

NOTIFICATION:

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

Sd/

District Education Officer (Male) Dera Ismail Khan

Endst: No. 2048 9- 96 / ADEO(Estab; Pry) Dated D.I.Khan the: 14 / 10 /2020.

Copy forwarded for information to the:

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

District Education Officer (Male) Dera Ismail Khan

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

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

The committee consists of following members.

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

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

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

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

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

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

	SERIAI NO	CNIC	NAME	FATHER NAME		PRESENT PLACE OF POSTING	DATE OF BIRTH	DATE OF TAKING CHARGE	SCORE	TEHSIL	METHOD OF APPOINTMENT	REMARKS
Pen	1	12101- 8104636-5	SHAH JAHAN	GUL DAD	Dike	GMPS JALAL BORING	17 Mar 1961	01 Feb 1979		DIKHAN	DIRECT APPOINTMENT	
pen	22	12101- 8000082-7	AZIZ ULLAH	SAAD ULLAH	ĐK.	GPS DIN PUR	20 May 1961	26 May 1982		DIKHAN	DIRECT APPOINTMENT	
SSE		12103- 1490966-3	MUSHTAQ AHMAD	RAB NAWAZ	DIK;	GPS MITHA PUR KALAN	10 Apr 1962	16 Dec 1982		PAHARPUR	DIRECT APPOINTMENT	
SSC		1482132-1	ALLAH NAWAZ	MUHAMMAD NAWAZ	DIK	GPS KALA GORH	10 Sep 1962	17 Nov 1983		PAHARPUR	DIRECT APPOINTMENT	
FA	5.7	12013- 3841194-3	GHANI-UR-REHMAN	SHER DIL	DIK	GPS NO.1 PAHARPUR	01 Nov 1962	20 Dec 1983		PAHARPUR	DIRECT APPOINTMENT	
SSC	26°	월12101- 20961741-7	ASEEM KHAN	AZAM KHAN	DIK	GPS GILOTI	01 May 1963	19 May 1984		DIKHAN	DIRECT APPOINTMENT	
(et .		140A02020-2	MUHAMMAD RASHID	GHULAM JEELANI	DIK	GPS KOKAR GHARBI	10 Sep 1961	05 Sep 1984		DIKHAN	DIRECT APPOINTMENT	
pem		32130030~/	ABDUL SAMAD KHAN	ABDUL GHAFAR	DIK	GPS BASTI BALOCHAN	28 Apr 1961	17 Oct 1984		DARABAN KALAN	DIRECT APPOINTMENT	
55°		§U939U11-5	ABDUL RASHID	IMAM BAKHSH	DK	GMPS HAZARA PAKKA	15 Oct 1963	17 Oct 1984		PAROVA	DIRECT APPOINTMENT	
SSC	10:4	Α.	MUHAMMAD ABBAS SHAH	ABBUL HUSSAIN SHAH	DIK	GPS SAID ALIYAN	15 Apr 1965	17 Oct 1984		PAHARPUR	DIRECT APPOINTMENT	

	12101-35	SAADULLAH KHAN	HABIB ULLAH KHAN	4	GPS NO. 9 DIKHAN	10 Jan 1976 n	05 Dec 2014	130.48	DIKHAN, T.	NEW CONTRACTOR	Story St. 11 To
21 437 A 1994	0978280-3 ** 12102-	ABRAR AHMAD			GPS NO. 4 DARABAN	01 Apr 1983	17 May 2014	1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	DARABAN	NTS	, , , , ,
99-1-1-1-1-1	2620619-1	ABRAK AHMAD	NISAR AHMAD		KALAN	01 Apr 1983	1 / May 2014	129.42	KALAN	1813	
14. 23. OX 25.	12102- 3786840-3	SHAFQAT ULLAH KHAN	BARKATULLAH KHAN	TI.	GPS HATHALA	04 Aug 1985	17 May 2014	129.22	KULACHI	NTS	
NEW PORTON	12103- 1730498-5	LIAQAT HUSSAIN KHAN	KHADIM HUSSAIN KHAN	Dik	GPS BAND KURAI	14 Aug 1981	17 May 2014	129.02	PAHARPUR	NTS	
107727 11114527	12101- 5238687-7	IRSHAD ULLAH	MUHAMMAD IQBAL	DIK	GPS NO I GILOTI	11 Dec 1987	17 May 2014	128.85 .	DIKHAN .	NTS	
FEED 11357950	2101- 1778025-1	MUHAMMAD FAHEEM	SALIM NAWAZ	DIK	GPS BEHARI COLONY	14 Jan 1988	17 May 2014	128.69	DIKHAN	NTS	
	2101- 2334729-5	NAQEEB ULLAH	ABDUL LATIF	pik"	GPS WANDA HAIBATTI	15 Mar 1984	17 May 2014	128.47	DIKHAN	NTS	
	2103- 465101-9	MUHAMMAD BILAL	ABDUR REHMAN	DIK-	GPS NO.2 PAHARPUR	06 Jan 1986	17 May 2014	128.28	PAHARPUR	NTS	
155 At / 14 At 1781	2102- 779268-1	HIZBULLAH KHAN	MUHAMMAD ABBAS KHAN	DIK	GPS NO.1 TAKWARA	20 Apr 1987	05 Dec 2014	128.25	KULACHI	NTS	
E3 E272 L5 X S 1.4	2103- 927358-5	MUHAMMAD IRFAN	BASHIR AHMAD	ĎΙΚ	GPS RANG PUR SHUMALI	09 Dec 1984	17 May 2014	127.91	PAHARPUR	NIS	
197 BO 16 1984	2103- 196931-7	MUHIB HUSSAIN SHAH	SYED RIAZ HUSSAIN SHAH	bik o	GPS NO. 2 DHALLAH	24 Apr 1981	05 Dec 2014	127.84	PAHARPUR	NTS	
500-0 F3 FV.		MUHAMMAD SHQAIB KHAN	IBRAHIM KHAN	bik.	GPS WANDA NARKANI	04 Feb 1993	17 May 2014	127.73	PAHARPUR	NTS	
EULEZA XVENAS	1201 609430-1	ASSAD HUSSAIN SHAH	MASROOR HUSSAIN SHAH	ĐΚ	GPS WANDA TALGI	19 Sep 1989	05 Dec 2014	127.55	PAHARPUR	NTS	
にとりてノーなったスト	2101- 032309-7	MUHAMMAD YOUNIS	MUHAMMAD RAMZAN	ΦIK	GPS KPK	10 Apr 1982	17 May 2014	127.49	DIKHAN	NTS	
173 177 11 1251	2103- 501335-9	ABDUR RAUF KHAN	MAAZ ULLAH KHAN	DIK.	GPS KOT MASOODAN	02 Jan 1977	05 Dec 2014	126.77	PAHARPUR	NTS	
14:12-77-12:12:12:1	2101- 144698-1	ISRAR MUHAMMAD	MUHAMMAD BAKHSH	DIK	GPS JHOKE GUMLA	16 Mar 1985	17 May 2014	126.62	PAROVA	nts	
The second second		QAZI MUHAMMAD ABDUL WAHAB	QAZI KHIZAR HAYAT	DIK	GPS HAFIZ ABAD	25 Feb 1986	17 May 2014	126.23	PAHARPUR	NTS	
	2105- 354017-3	RIAZ ALI KHAN	NIAZ ALI KHAN	DIK.	GPS RAMAK NO 1	15 Sep 1990	17 May 2014	125.50	PAROVA	NTS	
20.573	2101-	SHOAIB UR REHMAN	GHULAM SUBHANI	DIK :	GPS GARA RASHEED	03 Dec 1985	17 May 2014	125.38	PAROVA	NTS	
12	2101-	MUHAMMAD ZUBAIR	MUHAMMAD JAVEED	DIK	GPS BALOCH NAGAR	20 Dec 1985	17 May 2014	124.54	DIKHAN	итз.	
7 T2	101-	HIDAYAT ULLAH	MUHAMMAD AFZAL	DIKS:	GPS BUCHRI	03 Jul 1987	17 May 2014	124.50	PAROVA	NTS	
EAST 17-1 1-1 CC.	2103- 391600-7	MUHAMMAD TARIQ	ABDUL QAYYUM	DIK ¥	GPS ASIF ABAD	03 Sep 1988	17 May 2014	124.29	PAHARPUR	. STN	
こう クソメネディ	2102- 136771 <i>-</i> 9	MRAN ULLAH	ABDUL WAHAB	Section 1	GPS BEHLOL KHEL	10 Feb 1980	17 May 2014	123.87	KULACHI	NTS	

(a) t

#

10 2 M					Him to the facility of the state of the stat						
	12103-17 3750799-1	NAZIR ÄHMAD KHAN	MUHAMMAD KHAN		GPS HASSANI KHEL	10 Mar 1988	17 May 2014	123.85	PAHARPUR	NTS	•
	12101- 8111998-7	MUHAMMAD ZAFFAR	ALLAH BAKHSH		GPS MANDHRA SAIDAN	07 May 1976	05 Dec 2014	123.69	DIKHAN	NTS	·
	12103- 2562738-1	MUHAMMAD IMRAN	SHER MUHAMMAD		GPS RAJAN PUR	10 Mar 1991	17 May 2014	123.55	PAHARPUR	NTS .	
	12101- 0991881-9	MUHAMMAD IBRAHIM	MOLVI IMAM BAKHSH	ŮΚ	GPS JATTA	02 Jul 1984	17 May 2014	123.29	PAROVA	NTS	
2	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	трік	GPS NO.2 PAHARPUR	14 May 1986	17 May 2014	122.07	PAHARPUR	NTS	
	12103- 5710032-5	SARDAR KHAN	ABDUL SATTAR KHAN		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- 29315198-9	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. I MUSAZAI	21 Apr 1992	17 May 2014	121.49	DARABAN KALAN	NTS	
	12101- 9631824-1	MUHAMMAD ZULQARNAIN HAIDER	SAIF UR REHMAN	BIK	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	i
	12101- 9086383-7	MUHAMMAD ARSHAD	MUHAMMAD JAAN .	DIL.	GPS KURAI	03 Feb 1989	17 May 2014	121.37	DIKHAN	NTS	
	12101- 32 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 ·	~ HKSS	GPS CHAH MUNDHR WALA	10 Sep 1984	17 May 2014	119.97	PAHARPUR	NTS	
224	12103- 8705620-7	MOHAMMAD ARIF	ABDUL ALEEM		GPS KURRAR	02 Feb 1980	17 May 2014	119.96	PAHARPUR	NTS	
245	12101- 5983191-5	MUHAMMAD IQBAL	BASHEER AHMAD	DJK.	GPS JHOKE JHEDA	04 Sep 1984	05 Dec 2014	119.96	PAROVA	NTS	
246	12101- 7337152-1	MUHAMMAD ASIF	GUL SHER	DIK	GPS WAJHUN	15 Feb 1982	17 May 2014	119.93	PAHARPUR	NTS	
20247	12103- 5734305-9	JAVED KHAN	SONA KHAN	DIK.	GPS BILOT SHARIF	06 Sep 1985	17 May 2014	119.89	PAHARPUR	NTS	
4248 44	12101- 1764785-7	MUHAMMAD SHOAIB	FAIZ MUHAMMAD .		GPS MOGA	10 Jan 1988	17 May 2014	119/5 1	DARABAN KALAN .	NTS	
120	7534975-9	AURANGZEB	MUHAMMAD SHAFI	DK v	GPS BEHARI COLONY	12 Sep 1985	17 May 2014			NTS	
2250	12101- 15594929-7	MUHAMMAD SHAKEEL	KHALIL AHMAD	DIK	GPS SULTANIA	12 Apr 1990	17 May 2014	119.47	DIKHAN	NTS	
251	12104- 2596828-3	MUHAMMAD JAMSHED	AMIR MUHAMMAD	131K 9293		8 Jan 1988	17 May 2014	11948	DARABAN KALAN	NTS	
					A -	<u> </u>	<u> </u>			· <u></u>	:

-96%

		12101- **** 6127838-1	MUHAMMAD MATI ULLAH	AHMAD SAEED		GPS BEHARI COLONY	P. Sandard St. Prop. of the St.	17 May 2014 (119.27	DIKHAN-	NIS S	7 Te
		12102- 8432598-3	HAFIZ UR REHMAN	FAZAL REHMAN		GPS NO.3 MADDI	07 Apr 1989	17 May 2014	119.23	KULACHI	NTS	
		12103- 5723200-1	ABDUL GHAFFAR	MUHAMMAD HUSSAIN		GPS CHAH LADHA	13 Mar 1986	17 May 2014	119.10	PAHARPUR	NTS	
X Q		12102- 4897404-1	MUHAMMAD IMRAN	sona khan	DIK	GPS NO.2 KULACHI	02 Jul 1985	17 May 2014.	119.03	KULĄCHI	NTS	
	22.6	12102- 1414606-5	NAEEM SHAH	HAKEEM SHAH		GPS NO. 4 DARABAN KALAN	15 Dec 1982	17 May 2014	118.86	DARABAN KALAN	NTS	
No.	257-7	12103- 8642875-1	MUHAMMAD RIAZ UR REHMAN	SAHIB JAN	D) (c	GPS WANDHA YARIK	09 Nov 1988	17 May 2014	118.83	PAHARPUR	NTS	
	258-4	12103- 0254015-9	GHULAM SAMDANI	RAZA MUHAMMAD	-DIK	GPS MADI KHEL	17 Aug 1986	17 May 2014	118.62	PAHARPUR	NTS	
	0.0	12102- 4302096-3	MUHAMMAD RIAZ	HUSSAIN BAKHSH	OK.	GMPS G.RABNAWAZ	19 Feb 1984	17 May 2014	118.57	KULACHI	NTS	
	200	12103- 5462943-1	MUHAMMAD ALI	RAIS KHAN	JOK.	GPS WANDA LALI	09 Јал 1985	17 May 2014	118.30	PAHARPUR	พเร	
· 2	deiz.	12103-	MUHAMMAD IRFAN . ULLAH	GUL BADSHAH	Dic	GPS WANDA LALI	04 Jan 1991	17 May 2014	118.06	PAHARPUR	NTS	
	262 b	12103- 2043062-1	KAMRAN ALI	GHULAM HASSAN	OK	GPS NO.1 PAHARPUR	03 Dec 1984	17 May 2014	117.75	PAHARPUR	NTS ·	
	76314	12103- 8169823-5	MUHAMMAD ZEESHAN AHMAD	AHMAD NAWAZ	or	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	
	263	12104- 8852999-9	MUHAMMAD KAMRAN	MULAZIM HUSSAIN	Dik	GPS MOCHIWAL	03 Mar 1986	17 May 2014	117.24	DARABAN KALAN	NTS	-
	266†	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 .	
H.A.	⊕-∦-₹ 267:-	12101- 7896018-1	HAJI DILAWAR KḤAN	HAJI MIRZA KHAN	DIK	GPS KHUTTI	24 Apr 1989	17 May 2014	116.88	DIKHAN	NTS	
	26884	12102-	HAIBAT KHAN	MUHAMMAD AMEER KHAN	DIK	GPS NO.1 KULACHI	11 Feb 1982	17 May 2014	116.83	KNÍVCHI	NTS .	
	76737	12103-	MUHAMMAD JABBAR	GHULAM RASOOL	ĎĬĶŸ	GPS KACHA MALI KHEL	30 Oct 1988	17 May 2014	116.82	PAHARPUR	NTS	
	270	12103-	GUL NAWAZ	MUSA KHAN	DIK	GPS NO.1 ABDUL KHEL	15 Mar 1984	17 May 2014	116.81	PAHARPUR	NTS	
達		12102- 2134578-7	TAHIR KHAYYAM	TAUS KHAN	DIK	GPS NO.1 KULACHI	16 Feb 1983	17 May 2014	1,16.75	KULACHI	NTS .	
	020-612	12101-	ABDUL BASAT	MAULVI GHULAM HASSAN	DIK	GPS KOT ESSA KHAN	02 Jan 1992	17 May 2014	116.49	DIKHAN	NTS	
× E	771	12101-	MUSHTAQ AHMAD	JUMMA KHAN	DIK	GPS KHANA SHARIF	02 Jan 1980	17 May 2014	116.40	PAROVA	NTS	
	3	12101.	MUHAMAMD RAMZAN	SHER ZAMAN	DIK-	GPS GARA MORE	05 Mar 1981	17 May 2014	116.35	DIKHAN	NTS	
-11£	100				Sec. 25	<u> </u>						

مرة أور ويونيون ويوايي

#S

?

erane.												
.3.E.		12103-17 6799253-7	MUHAMMAD ZUBAIR ' ' KHAN	ABDUL SATTAR KHAN		GPS WANDA UMARI	03 Feb 1986	17 May 2014	11632	PAHARPUR	NTS	
	278	§12103- §8271339-1	MUHAMMAD YOUNAS	GANMON	·	GPS NO I UMRAY WALI	03 Mar 1987	17 May 2014	116.25	PAHARPUR	NTS	•
		12103- 6940574-7	TAHIR KHAN	HAJI NADIR KHAN	SDIK	GPS NO.1 PAHARPUR	25 Mar 1992	17 May 2014	116.13	PAHARPUR	NTS	
	278	12101- 5583256-9	SANA ULLAH	MUHAMMAD HANIF		GPS JK/ QURESHIAN	23 Mar 1987	17 May 2014	115.87	DIKHAN	NTS	
	270	12101- 8289665-1	ASIF ULLAH	GHULAM JAN	, UIK	GPS WANDA HAIBATTI	04 Feb 1988	17 May 2014	115.70	DIKHAN	NTS	
	280	12101- 0924552-5	ALLAH BAKHSH	SARDAR BAKHSH	ODIK 1	GPS JHOKE TARHELI NO.02	26 May 1983	17 May 2014	115.55	PAROVA .	NTS	
,	281	12101- 7341749-1	MUHAMMAD YASEEN	MUHAMMAD AMIN		GPS NO.10 DIK	20 Sep 1972	17 May 2014	115.49	DIKHAN	NTS	
	282	12103- 3921303 <i>-</i> 3	SHOUKAT ULLAH	GHULAM MUHAMMAD	DIK	GPS UDWAL	07 Apr 1990	17 May 2014	115.46	PAHARPUR	NTS	
	283	12101- 6829025-5	NAVEED AHMED	ABDUL MAJID	DIK	GPS BASTI DIRKHAN	15 Apr 1985	05 Dec 2014	115.36	DIKHAN	NTS	
	2846	12103- 7312799-1	GHULAM MOHAY UD DIN	MUHAMMAD RAMZAN	DIK	GPS BHITANIAN	01 Nov 1984	05 Dec 2014	115.08	PAHARPUR	NTS	
	285	12102- 9927407-1	MUHAMMAD KHALID ·	ABDUL MAJEĘD	DIK	GPS NO.3 MADDI	20 Jan 1988	17 May 2014	115.05	KULACHI	NTS . ·	
	280	12103- 1413344-3	SHEIKH JAWAD AHMAD	SHAIKH RIAZ AHMAD		GPS CHISTIA RIZWIA PHP	31 Dec 1987	17 May 2014	115.02	PAHARPUR	NTS ·	
	(All)	12103- 9151950-7	MUHAMMAD ARIF	GHULAM HUSSAIN	ÐK	GPS BILOT SHARIF	20 Mar 1983	17 May 2014	114.89	PAHARPUR	NTS	
	288	12103- 1779028-7	MUHAMMAD BILAL	RAB NAWAZ -	DIK	GPS TOBA	01 Apr 1992	17 May 2014	114.56	PAHARPUR	NTS .	
	289	12101- 3224864-1	MUHAMMAD ZAFRAN	HIDAYAT ULLAH SHAKIR	ODIK	GPS NO. 11 DIKHAN	15 May 1989	17 May 2014	114.52	DIKHAN	NTS	*
1	2907	12101- 0915691-1	MUHAMMAD BARAN	MAKHAN KHAN	, DOK	GPS NO. 2 HAJI MORA	20 Mar 1979	05 Dec 2014	114.47	DIKHAN	NTS	,
	4291	12101- 0409535-9	MUHAMMAD QAISER KHAN	SANWAL KHAN	DIK	GPS DARABAN KHURD	01 Oct 1986	17 May 2014	114.42	PAROVA	NTS	
	292	12101- 7672606-1	ASMAT ULLAH	KHUDA BAKHSH	DIK	GPS KOTLA SAIDAN	17 Apr 1986	17 May 2014	·114.40	DIKHAN	NTS	
	‡2933% 1383	12101- 3228351-9	AZIZ ULLAH	ALLAH WASAYA	DIK	GPS HISSAM	30 Apr 1986	17 May 2014	114.25	DIKHAN	NTS	
	224	12101- 0945908-3	MUHAMMAD BILAL	MALIK SOOBA	DIK	GPS RANGPUR JANUBI	12 Dec 1981	17 May 2014	114.20	PAROVA	NTS	
	1,295 1,295	12103- 1502759-7	ASMAT ULLAH	MUHAMMAD KHAN	DIK	GPS NO. 1 DHALLAH	01 _. Jan 1978	25 Feb 2017	114.15	PAHARPUR	NTS .	
	1296 sp	12102- 4662592-1	MUHAMMAD TARIQ	GHULAM MUSTAFA	DIK	GPS NO.1 RORRI	05 Oct 1990	17 May 2014	114.06	KULACHI	NTS .	
: : :	297.5	,	MOHAMMAD ATIF SHAHID	AMANULLAH	DIK	GPS KURAI	18 Apr 1983	05 Dec 2014	113.84	DIKHAN	NTS	
•				11		~ 1 \$Q						

Q +

___9i

DARABAN NTS
KULACHI NTS
PAROVA NTS
PAHARPUR NTS
DIKHAN NTS
PAHARPUR NTS
KULACHI NTS
DIKHAN NTS
PAHARPUR NTS
DIKHAN NTS
DIKHAN NTS
DIKHAN NTS
KULACHI NTS
PAHARPUR NTS
DIKHAN NTS
PAROVA NTS
DIKHAN NTS ·
DARABAN NTS CALAN
OARABAN NTS

1

...

—-103

11943	12101- 8047233-5	RISHI HANS	HEERA LAL	PK.	GPS NAI ABADI KOTLA SAIDAN	12 Jul 1996	05 May 2017	90.48	DIKHAN	NTS	
1053	12101- 7464937-1	SHAFQAT ULLAH	MUHAMMAD AMEEN	P. 600-351	GPS JEEWAYA SAHI	13 Aug 1988	27 Sep 2017	90.37	DIKHAN	NTS	
	12101- 0970848-7	SHANKAR	MANNA LAAL	DIK	GPS KHANA SHARIF	04 Oct 1973	09 Nov 2017	88.76	PAROVA .	NTS	• •
5107	1	SYED MUHAMMAD TAQI ZAIDI	SYED NASIR HUSSAIN ZAIDI	DK 1	GPS AMIR SHAH	02 Feb 1977	22 Feb 2018	,	PAHARPUR	DECEASED SON / MEDICAL BOARD QUOTA	
DATE OF THE PARTY.	12101- 7976492-5	MUHAMMAD SOHAIL	GHULAM FARID	DIK D	GPS RATTA KULACHI	05 Mar 1980	22 Feb 2018	·	DIKHAN	DECEASED SON/MEDICAL BOARD QUOTA	
1425 a 1 1 QQ (46.5)	12101- 9408976-3	KHURAM SHEHZAD	MUHAMMAD IBRAHIM	DK.	GPS AHEER ABAD	01 Apr 1984	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
CONTRACTOR MANAGEMENT	12101- 8202352-1	ABDUR RASHID	ABDUR RAHIM	DK.	GPS GOMAL KHURD	31 Jan 1985	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
31201 31201	12101- 0808292-3	AFTAB MOHAY UD DIN	MOHAMMAD ASLAM		GPS [.] SHEIKH RAJU	02 Apr 1985 ·	22 Feb-2018		DIKHAN-	DECEASED SON / MEDICAL BOARD QUOTA	· ·
NT. 11.2 11.2 347	12101- 5595268-1	MUHAMMAD.ALI NUMAIR	SYED JAHANGIR ABBAS		C D C WANDA DAI OCH	21 Mar 1992	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	
ESTRIBUTER	12102- 5739990-3	IRFANULLAH	FATEH ULLAH		GPS NO.2 KOT ESA KHAN	04 Oct 1993	22 Feb 2018		CHODWAN	DECEASED SON / MEDICAL BOARD QUOTA	,
1204	12101- 5310377-9	ALI JAMSHED	JAMSHED AHMAD	DIK	G.P.S SHAIKH YOUSAF	13 Feb 1994	22 Feb 2018		DIKHAN	DECEASED SON / MEDICAL BOARD QUOTA	

CHAIRMAN: MUHAMMAD SHAFIQ

MEMBER 1: ASIM SAEED

MEMBER 2: MUHAMMAD DANISH ROOMAN_

Dietrici 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

Many and Doponem

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