

05.10.2022

Appellant in person present. Mr. Muhammad Jan, District Attorney for official respondents No. 1 to 3 present. Private respondent No. 4 in person present.

Appellant requested for adjournment on the ground that his counsel is not available today. Adjourned. To come up for arguments on 09.11.2022 before the D.B at Camp Court Swat.



(Rozina Rehman)  
Member (J)  
Camp Court Swat



(Salah-Ud-Din)  
Member (J)  
Camp Court Swat

06.07.2022

Counsel for the appellant present.

Noor Zaman Khattak, learned District Attorney for respondents present.

Former requested for adjournment as he has not made preparation of the case. Adjourned. To come up for arguments on 01.08.2022 before D.B at Camp Court, Swat.



(Fareeha Paul)  
Member (E)  
Camp Court, Swat



(Rozina Rehman)  
Member (J)  
Camp Court, Swat

1-8-22

*Due to Saadman vacated the case is adjourned to 6-9-22 for the same.*



06.09.2022

Appellant alongwith his counsel present. Mr. Asif Masood Ali Shah, Deputy District Attorney for official respondents No. 1 to 3 present. Private respondent No. 4 in person present and sought adjournment on the ground that his counsel is busy in the august Peshawar High Court, Peshawar. Adjourned. Last opportunity given. To come up for arguments on 05.10.2022 before the D.B at Camp Court Swat.



(Mian Muhammad)  
Member (Executive)  
Camp Court Swat

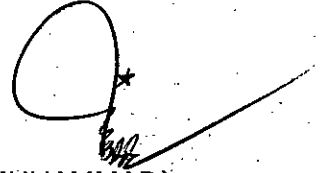


(Salah-Ud-Din)  
Member (Judicial)  
Camp Court Swat

10.01.2022

Clerk of learned counsel for the appellant present. Mr. Muhammad Rasheed, DDA for respondents present.

Due to non-availability of Hon'able Member (J), the case could not be heard. Adjourned. To come up for arguments on 25.04.2022 before D.B



(MIAN MUHAMMAD)  
MEMBER (E)

25<sup>nd</sup> April, 2022

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG for the official respondents present. Junior to counsel for private respondents present.

Learned Senior Counsel for private respondent is not in attendance and request for adjournment is made on his behalf. Last opportunity is granted. To come up for arguments on 08.06.2022 before the D.B at Camp Court, Swat.



(Fareeha Paul)  
Member(E)



Chairman

8<sup>th</sup> June, 2022

None for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present.

Counsel are on strike. To come up for arguments on 06.07.2022 before the D.B at camp court Swat.



(Mian Muhammad)  
Member(E)

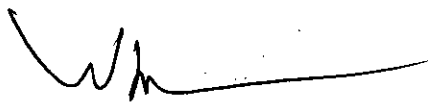


(Kalim Arshad Khan)  
Chairman  
Camp Court Swat

02.08.2021 Counsel for the appellant present.

Mr. Muhammad Rasheed, Deputy District Attorney for official respondents No. 1 to 3 present. Counsel for private respondent No.4 present.

Counsel for private respondent No. 4 requested for adjournment; granted. To come up for arguments on 21.09.2021 before D.B.



(Atiq-Ur-Rehman Wazir)  
Member (E)



(Rozina Rehman)  
Member (J)

21.09.2021 Junior to counsel and Mr. Kabirullah Khattak, Addl. AG for official respondents and counsel for the respondent No. 4 present.

D

Learned counsel for the appellant is not in attendance due to indisposition and request for adjournment is made on his behalf. Request accorded. To come up for arguments on 10.01.2022 before the D.B.



(Rozina Rehman)  
Member(Judicial)



Chairman

24.11.2020

Due to non-availability of D.B, the case is adjourned to 04.02.2021 for the same as before.

  
Reader

04.02.2021

Due to COVID-19, the case is adjourned for the same on 14.04.2021 before D.B.

  
READER

14.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 02.08.2021 for the same as before.

  
READER

12.5.2020

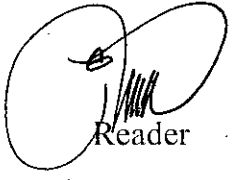
Due to COVID19, the case is adjourned to

4/8/2020 for the same as before.

  
Reader

04.08.2020

Due to summer vacation case to come up for the same on  
05.10.2020 before D.B.

  
Reader


05.10.2020


Junior counsel for appellant present.

Mr. Muhammad Jan learned Deputy District Attorney  
for respondents present.

Former requests for adjournment as senior counsel  
for appellant is indisposed.

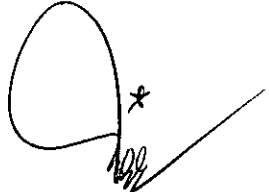
Adjourned to 24.11.2020 for arguments before D.B

  
(Atiq ur Rehman Wazir)  
Member (E)

  
(Rozina Rehman)  
Member (J)

12.03.2020

Counsel for the appellant present. Asst: AG  
alongwith Mr. Shahid Aziz, ADEO for official respondents  
and private respondent no. 4 in person present. Private  
respondent no.4 seeks adjournment as his counsel is  
not available today. Adjourned. To come up for  
arguments on 12.05.2020 before D.B.

  
Member

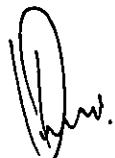
  
Member

12.12.2019

Appellant in person present. Asst: AG alongwith Mr. Sardaraz Khan, ADO, Mr. Shahid Aziz, ADO for official respondents no. 1 to 3 and private respondent no.4 in person present.

The representative of the official respondents no. 1 to 3 has submitted parawise comments. Private respondent no. 4 requests for further time to submit parawise comments.

Adjourned to 26.12.2019 on which date private respondent no.4 shall positively submit the parawise comments.



Chairman

26.12.2019

Counsel for the appellant present. Mr. Ziaullah, DDA for official respondents and private respondent no.4 in person present. Private respondent no.4 submitted written reply/comments which is placed on file. Adjourn. To come up for arguments on 08.01.2020 before D.B.



Member



Member

08.01.2020

Lawyers are on strike as per the decision of Peshawar Bar Association. Adjourn. To come up for further proceedings/arguments on 12.03.2020 before D.B.



Member



Member



21.10.2019

Appellant in person present. Mr. Zia Ullah, learned Deputy District Attorney alongwith M/S Shahid Anwar ADO and Rooh ul Amin Superintendent for official respondents present. Private respondent No.4 in person present.

Representatives of official respondents as well as private respondent No.2, request for time to furnish written reply. Granted. To come up for written reply/comments on 21.11.2019 before S.B.

  
Chairman

12.11.2019

Junior to counsel for the appellant and Addl. A.G present. No representative on behalf of the respondents is present.

Fresh notices be issued to the respondents for submission of written reply/comments on 05.12.2019 before S.B.

  
Chairman

05.12.2019

Appellant alongwith his counsel present. Mr. Kabirullah Khattak, Additional AG for official respondents No. 1 to 3 present. Mr. Asadullah Khan Yousafzai Advocate has submitted Vakalatnama on behalf of respondent No. 4. Placed on record.

The representative of official respondents has requested for further time to submit reply/comments. Adjourned to 12.12.2019 on which date all respondents shall positively provide the written reply. Application for suspension of impugned order shall also be argued on the next date.

  
Chairman

20.09.2019

Counsel for the appellant present.

Contends that through notification dated 22.02.2019 the appellant was promoted to the post of SST (BPS-16). The promotion order was reversed through notification dated 29.07.2019 without any notice to the appellant. The appellant was not provided with any opportunity of representation or setting-forth his defence. In the said manner, valuable service rights of the appellant were infringed.

In view of the available record and arguments of learned counsel, instant appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 21.10.2019.

Alongwith the appeal there is an application for suspension of impugned order dated 29.07.2019. Notice of the application be also given to the respondents for the date fixed.

Appellant Deposited  
Security Process Fee

20/9/19

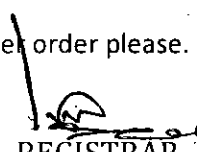
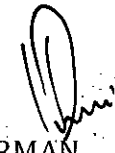


Chairman

Form- A  
FORM OF ORDER SHEET

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

Case No.- 1138/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	12/09/2019	<p>The appeal of Mr. Rahat Ullah presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR 12/9/19</p>
2-	13/09/19.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>20/09/19.</u></p> <p> CHAIRMAN</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR**

APPEAL NO. 1138 /2019

**RAHAT ULLAH**

**VS**

**EDUCATION DEPTT:**

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5.	Order	<b>C</b>	12- 13.
6.	Impugned order	<b>D</b>	14- 16.
7.	Departmental appeal	<b>E</b>	17- 19.
8.	Rejection	<b>F</b>	20.
9.	Vakalat nama	.....	21.

**APPELLANT**

**THROUGH:**

**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR**

**Khyber Pakhtunkhwa  
Service Tribunal**

**APPEAL NO. 1138 /2019**

**Diary No. 1841**

Mr. Rahat Ullah, SST (G) (BPS-16),  
GMS Bandan, District Dir Upper.....

**Dated 12/19/2019**

**.....APPELLANT**

**VERSUS**

- 1- The Govt: of Khyber Pakhtunkhwa through Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer (Male), District Dir Upper.
- 4- Mr. Badshah Azim, SST (G) (BPS-16, GHS Jelar, Dir Upper.

**.....RESPONDENTS**

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 29.07.2019 WHEREBY PROMOTION ORDER DATED 22.02.2019 OF THE APPELLANT TO THE POST OF SST (G) HAS BEEN WITHDRAWN AND AGAINST THE APPELLATE ORDER DATED 11.09.2019 WHEREBY DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED ON NO GOOD GROUNDS.**

**PRAYER:**

**That on acceptance of this appeal the impugned orders dated 29.07.2019 and 22.02.2019 may very kindly be set aside and the appellant may be placed against the post of SST (G) w.e.f 29.07.2019 with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.**

**R/SHEWETH:**

**ON FACTS:**

- 1- That appellant was initially appointed as PST (BPS-07 now BPS-12) on the proper recommendation of Departmental Selection Committee vide order dated 28.02.1993. That in response to the said order the appellant took over the charge and started performing his duty quite efficiently and upto the entire satisfaction of his superiors. Copy of the appointment order is attached as annexure.....**A.**
- 2- That during service the appellant was promoted to the post of PSHT (BPS-15) and the appellant has served against the post of PSHT till February, 2019 quite efficiently.

**Filed to-day**  
**Registrar**  
**12/19/19**

- 3- That appellant while serving as PSHT (BPS-15) was promoted to the post of SST (G) (BPS-16) vide Notification dated 22.02.2019. That after promotion to the post of SST (G) the appellant was further adjusted at GMS Bandan, District Dir Upper vide office order dated 01.03.2019 and in response the appellant submitted his arrival report and started performing his duty with all zeal and zest. Copies of the Notification and order are attached as annexure.....**B & C.**
- 4- That astonishingly vide order dated 29.07.2019 the promotion of the appellant to the post of SST (G) has been withdrawn by the respondent No.2 and reverted the appellant to the previous post of PSHT (BPS-15) and promoted the private respondent No.4 to the post of SST (G). Copies of the orders are attached as annexure.....**D.**
- 5- That appellant feeling aggrieved from the impugned order dated 29.07.2019 filed Departmental appeal before the appellate authority but the same was rejected vide order dated 11.09.2019 on no good grounds. Copies of the Departmental appeal and rejection order are attached as annexure.....**E & F.**
- 6- That appellant feeling aggrieved and having no other remedy filed the instant service appeal on the following grounds amongst the others.

**GROUND:**

- A- That the impugned orders dated 29.07.2019 and 11.09.2019 are against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan-1973.
- C- That the respondents acted in arbitrary and malafide manner while issuing the impugned orders dated 29.07.2019 and 11.09.2019.
- D- That the respondents discriminated the appellant amongst his colleagues to withdraw his promotion order dated 22.02.2019 vide impugned order dated 29.07.2019 which is not tenable and liable to be set aside.
- E- That the appellant has served the Department for a long period with unblemished service record and having seniority cum fitness, therefore, the appellant have the right to be promoted to the post of SST (BPS-16).

F- That the action of the respondent Department by reverting the appellant from the post of SST (BPS-16) and promoting the private respondent No.4 against the aforementioned post is against the Article-38 (e) of the Constitution of Islamic Republic of Pakistan-1973 which enshrines **"that the state shall reduce disparity in the income and earnings of individual including persons in the service of Pakistan"**.

G- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Dated: 12.09.2019.

~~APPELLANT~~

RAHAT ULLAH

THROUGH:

NOOR MOHAMMAD KHATTAK

&

MIR ZAMAN SAFI  
ADVOCATES

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

C.M No. \_\_\_\_\_/2019

IN

APPEAL NO. \_\_\_\_\_/2019

**RAHAT ULLAH**

**VS**

**EDUCATION DEPTT:**

**APPLICATION FOR SUSPENSION OF**  
**OPERATION OF THE IMPUGNED ORDER DATED**  
**29.07.2019 TILL THE DISPOSAL OF THE ABOVE**  
**MENTIONED APPEAL**

**R/SHEWETH:**

- 1- That the above mentioned appeal along with this application has been filed the appellant before this august service Tribunal in which no date has been fixed so far.
- 2- That appellant filed the above mentioned appeal against the impugned orders dated 29.07.2019 and 11.09.2019 whereby promotion order dated 22.02.2109 of the appellant to the post of SSt (G) (BPS-16) has been withdrawn.
- 3- That all the three ingredients necessary for the stay is in favor of the appellant.
- 4- That the impugned orders dated 29.07.2019 has been issued by the respondents in utter disregard of law and prevailing Rules.

It is therefore, most humbly prayed that on acceptance of this application the impugned order dated 29.07.2019 may very kindly be suspended till the disposal of the above mentioned appeal.

**APPLICANT**



**RAHAT ULLAH**

**THROUGH:**



**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**



**OFFICE ORDER:-**

The following appointments of trained PTC candidates (Trained from G. C. Thana) are hereby ordered ~~in~~ with effect from 1/3/93 as PTC teachers in BPS, NO. 7 in the schools as noted against their names subject to the following conditions.

SNO.	Name of Candidate/ Village.	Father's Name.	School Where appointed.	Remarks.
1.	Mr. Momin Khan, S/O Mohd Roz,	Darikand.	GPS, Shatez Brl.	N.C. Post
2.	Mr. Bakht Jamal, S/O Fazal Wahid,	Manial.	Manial.	-dO-
3.	Mr. Abdul Malik, S/O Toti Gul.	Katpatai.	-dO-	-dO-
4.	Mr. Jamalud Din, S/O Ahya Gul.	Warsakai.	Warsakai (GH)	-dO-
5.	Mr. Wazir Zada, S/O Alam Khan,	Nasrat Barawal.	Shatez (B)	-dO-
6.	Mr. Mohd Azam, S/O Mohd Aslam,	Bagh Maidan.	Warsakai (GH)	-dO-
7.	Mr. Noor Rehman, S/O Sher Gul.	Gumbatbanda.	Tikarkot.	-dO-
8.	Mr. Ikramul Haq, S/O Mohd Shah,	Safarai. T. gara.	Shah Bandai	-dO-
9.	Mr. Miftahud Din, S/O Fazal Maboed,	Kandaro.	-dO-	-dO-
10.	Mr. Abdul Ahad, S/O Wali Mohd,	Pitaw Badarkenai.	Dalator Kalkt.	-dO-
11.	Mr. Zahir Ahmad, S/O Gul Mohd,	Katan (B)	-dO-	-dO-
12.	Mr. Mohd Zaman, S/O Toti Rahman,	Barkand.	Dambarkon Dambarkon Nawruz Khan	V. Post Kalkt -dO-
13.	Mr. Said Rashid, S/O Abdur Rashid,	Rehankot. Bala.	-dO-	-dO-
14.	Mr. Barkat Jan, S/O Gulab Jan,	Kotkai.	Bedar Larjam,	-dO-
15.	Mr. Noor Mohd, S/O Mohd Seraj.	Dankar, Dir.	-dO-	-dO-
16.	Mr. Bakhtiyar Zamin, S/O Mohd Amin,	Sadiq Banda.	Kamalkhel.	-dO-
17.	Mr. Mohd Nagin Khan, S/O Pacha Mohd,	Jelar.	-dO-	-dO-
18.	Mr. Gul Zarin Khan, S/O Zamin Khan,	Jabbar.	Bandagai Karo.	-dO-
19.	Mr. Niaz Mohd, S/O Sardar Ali Khan,	Jabbar.	-dO-	-dO-
20.	Mr. Habibur Rahim, S/O Fazal Rahim,	Sadiqa Banda.	Kandaro Nihag.	V. Post.
21.	Mr. Amirbaz Khan, S/O Shahnazar Khan,	Dasker (P)	Karpat.	-dO-
22.	Mr. Mirzaman Khan, S/O Gul Zarin,	Kakad,	Dabona.	-dO-
23.	Mr. Shah Zaman, S/O Gul Haroon,	Lalo, Wari.	Talaw,	-dO-
24.	Mr. Mohd Azizud Din, S/O Shahbud Din,	Tarpatar.	Batlai.	-dO-
25.	Mr. Hidayatullah, S/O Ahmad,	Wari.	Bandan,	-dO-
26.	Mr. Attaullah Khan, S/O Sher Bahadar Khan,	Kakad,	Sundrai.	-dO-
27.	Mr. Mohd Tahir Khan, S/O Mohd Shireen,	Jabbar.	Singaram, Dir	-dO-

(See Page NO. 2)

**ATTENDED**

*[Handwritten signature]*

28. Mr, Gul Mohd Khan,	S/O Sher Mohd Khan,	Kotkai. B.	GPS, Prata.	V. Post.
29. Mr, Faridullah Khan,	S/O Mohd Akbar Khan,	Gulbala, Md:	: Kachal.	-dO-
30. Fazal Hamid,	S/O Ali Noor,	Takoro.	: Kharkoi.	-dO-
31. Mohd Sultan,	S/O Mohd Rahman,	Sabarshah.	: Dhall.	-dO-
32. Haji Mohd,	S/O Bahadar Munir,	Titar.	: Shahai.	-dO-
33. Mr, Mahmood Jan,	S/O Shireen Jan,	Islamdheri.	: Kambat NO.2 N.C. Post.	
34. Mr, Badshah Mohd,	S/O Shahbaz Khan,	Nawaikoto.	: -dO-	-dO-
35. Mr, Yaqob Khan,	S/O Abdullah Khan,	Shena.	: Nawaikalai,	*dO* V. Post.
36. Mr, Hazrat Hussain,	S/O Khan Said,	Battan, Ktyarai.	Kamal Khan,	N.C. Post.
37. Mr, Munawar Shah,	S/O Abdur Rashid,	Sehsada,	: -dO-	-dO-
38. Mr, Azizul Haq,	S/O Fakhrud Din,	Chatpat.	: Badwan,	-dO-
39. Mr, Abdul Ghafoor,	S/O Fazal Raziq,	Adamdheri.	: -dO-	-dO-
40. Mr, Ghulam Badshah,	S/O Ramdad Khan,	Tindodog.	: Khadagzo Sri,	-dO-
41. Mr, Abdul Ghaffar,	S/O Fazal Akbar,	Jawaro Asbanr.	: -dO-	-dO-
42. Mr, Azam Khan,	S/O Khan Wali.	Peshai.	: Zulekha Barawl,	-dO-
43. Mr, Serajul Haq,	S/O Mohd Shah.	Safarai.	: -dO-	-dO-
44. Mr, Hidayat Gul, S/O	Khan Gul.	Dogai.	MPS, Gatkoto Brawal.	Vacant Post,
45. Mr, Rahmat Wali, S/O	Said Wali.	Kandaro (P)	: Ailgai.	-dO- -dO-
46. Mr, Yusaf Khan, S/O	Mohd Saeed Khan,	Chinarono Shah,	GPS, Jabba (P)	-dO- -dO-
47. Mr, Bahadar Shah, S/O	Sultan Zarin,	Gulbatkai.	GPS, Jabba Bala.	-dO-
48. Mr, Riaz Ahmad, S/O	Ghulam Nabi,	Pukhtawargai.	GPS, Darora Nawroz Khan	N.C. Post.
49. Mr, Mohd Rashid, S/O	Khuaidad Khan,	Tangai Banda.	: Mohin Banda, Dir.	-dO-
50. Mr, Khan Zarin, S/O	Mohd Azim Khan,	Siardarra.	: -dO-	-dO- -dO-
51. Mr, Saeedur Rehman, S/O	Abdul Hamid,	-dO-	: Doon Bala, Dir.	Vacant post.
52. Mr, Bahadar Mohd, S/O	Noor Mohd,	Dheri Talash.	: Dankar, Dir	-dO-
53. Mr, Ahmad Feroz, S/O	Feroz,	Banda.	-dO- MPS, Didkan, Dir.	-dO-
54. Mr, Israrul Haq, S/O	Amanul Haq,	Shalkandai.	GPS, Chilal.	Dir -dO-
55. Mr, Usman Saeed, S/O	Gran Saeed,	Dogai.	MPS, Doobjango.	Dir. -dO-
56. Mr, Anwar Nawaz Khan, S/O	Wazir Khan,	Khovar Siar.	GPS, Doon Serai.	-dO-
57. Mr, Umar Wahab, S/O	Zaman Khan,	Jabbar,	: Haji Shai, Dir.	-dO-
58. Mr, Mohd Ikram, S/O	Mohd Inam,	Mansoorbanda.	: Thall Kalan, Dir.	-dO-

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- 59. Mr, Ghulam Rahman, S/O Mohd Umar, Shekowlai. GPS, Komrat. Dir. V. Post.
- 60. Mr, Mohd Khurshaid, S/O Sakhai Jan, Gosam, :. Chichlo, Dir. -dO-
- 61. Mr, Sher Ali Khan, S/O Kachkol Khan, Nakhtarokot. MPS, Loie Nail, Dir. -dO-
- 62. Mr, Ashfaq Ahmad, S/O Tajbar Khan, Dislawar. :. Chakarbatola. Dir. -dO-
- 63. Mr, Adshab Zamin, S/O Mian Gul Darin, Asharai, Wari. :. Shergah, Dir. -dO-
- 64. Mr, Miaz Ali, S/O Fazal Alim, Saraibala. GPS, Narkon, Dir. -dO-
- 65. Mr, Rahatullah, S/O Mazullah Khan, Usherai. :. Sia Ghanshal. Dir. -dO-
- 66. Mr, Khawaja Mizamul Haq, S/O Rafiul Haq, Kassbanda. :. Sia Ghanshal. -dO-
- 67. Mr, Bawar Jan, S/O Said Alam Jan, Thrai. MPS, Hajiabad Donserai. -dO-
- 68. Mr, Habibur Rehman, S/O Gul Mula, Shang, Wari. :. Waigal. Dir. -dO-
- 69. Mr, Mohd Afaaa, S/O Mahmood, Dag Gosam, :. Gargal. -dO-
- 70. Mr, Ihsanul Haq, S/O Mirajul Haq, Ranai. :. Kass Karo. Wari. -dO-

CONDITIONS:-

1. Charge report should be submitted to all concerned.
2. They are directed to produce Health & Age certificates from the Civil Surgeon, Dir at Timergara.
3. Their appointment being temporarily are liable to termination at any time with out notice. In case they want to leave this Deptt: they will have to give one months notice in advance or deposit one months pay.
4. Before handing over charge their original documents should be checked.
5. They may not be handed over the charge if their age exceeds 28 years or below 18 years.

(KARIMULLAH KHAN)  
 DISTT: EDUCATION OFFICER (M)  
 PRY: DIR AT TIMERGARA.

OFFICE OF THE DISTT: EDUCATION OFFICER (M) PRY: DIR AT TIMERGARA.  
 Endst: NO. 534-610 / PED/A-I Dated Timergara th 28 / 2 / 93

Copy of the above is forwarded to:-

1. All the SDEOs (M) in Distt: Dir for information.
2. All the Candidates concerned for compliance.
3. The Distt: Accounts Officer Dir at Timergara

M. Anwar/

*(Signature)*  
 DISTT: EDUCATION OFFICER (M)  
 PRY: DIR AT TIMERGARA.

**ATTESTED**

*(Signature)*



SSTs (M) *Dir Upper*

## Directorate of Elementary and Secondary Education

B

7

### Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24<sup>th</sup> July, 2014, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) noted against each BPS-16 (Rs. 18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted by the District Education Officer concerned.

#### A. SST (Bio/Chem)

##### 1. Promotion to Senior PSHT/SPST/PST to SST (Bio/Chem) BPS-16.

Total No. of vacant Posts of SST (Bio-Chem)	11
25% share initial recruitment	03
75% share for Promotion.	02
20 % Share of promotion of PSHT/SPST/PST	04
Posts available for promotion	03
Proposed for Promotion	03
Recommended for promotion	03
Balance	01

S. No	S.L No	Name of Official & Present Place of Posting	Date of Birth	Date of Appott: as Regular PST	Qualifica tion	Remarks
1	1086	Ihsanullah GPS Markhano	1/3/1987	1/12/2006	BSc/B.Ed	Services placed at the disposal of DEO (M) Dir Upper for further posting against SST (Bio/Chem) post
2	1324	Israr Ahmad GPS Tangai	28/12/1987	18/12/2008	BSc/B.Ed	-----do-----
3	1403	Mushiaq Ahmad GPS. Tangai	1/12/1987	1/8/2011	BSc/BED	-----do-----

#### B. SST (Phy-Maths)

##### 1. PROMOTION OF PSHT/SPST/PST TO SST (Phy-Maths) BPS-16

Total No. of SST Phy-Maths (M) Posts vacant Posts	10
25% share initial recruitment	03
75% share for Promotion.	07
20 % Share of promotion of PSHT/SPST/PST	02
Posts available for promotion	02
Proposed for Promotion	02
Recommended for promotion	02

S.No	S.L No	Name of Official & Present Place of Posting	Date of Birth	Date of Appott: as Regular PST	Qualifica tion	Remarks
1	1280	Muhammad Wahab GPS Doro	20/4/1984	19/11/2008	BSc/B.Ed	Services placed at the disposal of DEO (M) Dir Upper for further posting against SST (Phy-Maths) post
2	1299	Faridullah GPS Qila Chukiatan	30/11/1986	1/12/2008	BSc/B.Ed	-----do-----

ATTESTED

/s/

**C. SST (General)**

**1. PROMOTION OF SCT/CT TO SST (General) BPS-16**

Total No. of vacant Posts of SST (General)	48
25% share initial recruitment	12
75% share for Promotion.	36
40 % Share of promotion of SCT/CT	19
Posts available for promotion	19
Proposed for Promotion	19
Recommended for promotion	

S. No	S.L No	Name of Official & Present Place of Posting	Date of Birth	Date of Appott: as Regular CT	Qualificati on	Remarks
1	08	Muhammad Riaz GHS Sawani	2/2/1966	1/8/1995	BA/B.Ed	Services placed at the disposal of DEO (M) Dir Upper for further posting against SST (General) post.
2	11	Matiullah GHSS Swani	6/10/1968	1/9/1995	BA/B.Ed	-----do-----
3	14	Mumtaz Ahmad GCMHS Dir	5/1/1967	8/9/1998	BA/B.Ed	-----do-----
4	19	Khashi Ullah GHS Chokiatan	15/9/1965	6/4/1999	BA/B.Ed	-----do-----
5	20	Muhammad Ishaq GHSS Ushera	3/2/1973	6/4/1999	BA/B.Ed	-----do-----
6	21	Khan Daraz GHSS Wari	13/1/1974	6/4/1999	BA/B.Ed	-----do-----
7	22	Nizam Ud Din GHS Daskoör	6/4/1964	7/4/1999	BA/B.Ed	-----do-----
8	23	Mohib Ullah GHSS Sheringal	7/1/1972	9/4/1999	BA/B.Ed	-----do-----
9	24	Muhammad Amir Khan GHSS Wari	18/1/1966	10/4/1999	BA/B.Ed	-----do-----
10	25	Muhammad Nazir GHS Jan Bhattai	6/11/1964	11/5/1999	BA/B.Ed	-----do-----
11	27	Rafi Ullah GHS Bibyaware	4/3/1971	7/6/1999	BA/B.Ed	-----do-----
12	28	Muhammad Usman GCMHSS Dir	5/12/1974	14/7/1999	BA/B.Ed	-----do-----
13	29	Khalil Ur Rehman GHS Pacha Kalay	4/1/1978	15/7/1999	BA/B.Ed	-----do-----
14	30	Khaista Muhammad GHSS Gandigar	2/10/1965	16/7/1999	BA/B.Ed	-----do-----
15	32	Shams Ur Rahim GHS Nihag	5/10/1977	16/7/1999	BA/B.Ed	-----do-----
16	33	Muhammad Zamin GHS Nagrail	1/5/1965	18/5/1985	BA/B.Ed	-----do-----
17	36	Zahoor Ul Islam GHSS Sheringal	2/1/1975	20/7/1999	BA/B.Ed	-----do-----
18	37	Sahibzada Roohullah GHS Rehan Kot	5/8/1969	1/11/1999	BA/B.Ed	-----do-----
19	38	Bakht Zada GHS Karkabanj	6/2/1966	1/11/1999	BA/B.Ed	-----do-----

**ATTESTED**

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2. PROMOTION OF PSHT/SPST/PST TO SST (General) BPS-16.

Total No. of vacant Posts of SST (General)	48
25% share initial recruitment	12
75% share for Promotion.	36
20 % Share of promotion of PSHT/SPST/PST	10
Posts available for promotion	10
Proposed for Promotion	10
Recommended for promotion	10

S. No	S.L No	Name of Official & Present Place of Posting	Date of Birth	Date of Appott: as Regular PST	Qualifica tion	Remarks
1	42	Amir Muhammad GPS Loi Baba	5/6/1962	25/1/1986	BA/B.Ed	Services placed at the disposal of DEO (M) Dir Upper for further posting against SST (General) post.
2	249	Muhammad Munir GPS Mashango Kass	1/3/1965	22/11/1992	BA/B.Ed	-----do-----
3	260	Sahibzada GPS Shaga Amlooknar	2/1/1969	22/11/1992	BA/B.Ed	-----do-----
4	263	Aurangzeb GPS Daskoor Payan No.2	1/4/1969	22/11/1992	BA/B.Ed	-----do-----
5	269	Muhammad Hayat GPS Batal	1/4/1969	22/11/1992	BA/B.Ed	-----do-----
6	270	Sultan Zeb GPS Shafalo Khawar	15/7/1969	22/11/1992	BA/B.Ed	-----do-----
7	279	Muhammad Ali GPS Jan Battai No.1	1/6/1965	22/11/1992	BA/B.Ed	-----do-----
8	289	Alam Zeb GPS Shakerani	1/4/1970	22/11/1992	BA/B.Ed	-----do-----
9	292	Muhammad Ayaz GPS Kolal Bandi No.1	8/11/1972	22/11/1992	BA/B.ED	-----do-----
10	294	Rahat Ullah GPS Galkor	3/2/1968	1/3/1993	BA/B.ED	-----do-----

3. PROMOTION OF SDM/DM TO SST (General) BPS-16.

Total No. of vacant Posts of SST (General)	48
25% share initial recruitment	12
75% share for Promotion.	36
04 % Share of promotion of SDM/DM	02
Posts available for promotion	02
Proposed for Promotion	02
Recommended for promotion	02

S.No	S.L No	Name of Official & Present Place of Posting	Date of Birth	Date of Appott: as Regular DM	Qualifica tion	Remarks
1	2	Aziz Ahmad GHS Gamseer	7/12/1975	6/4/1999	MA/B.Ed	Services placed at the disposal of DEO (M) Dir Upper for further posting against SST (General) post.
2	4	Abdullah GHS Bin Bala	2/2/1974	11/5/1999	MA/B.Ed	-----do-----

4. PROMOTION OF SAT/AT TO SST (General) BPS-16.

Total No. of vacant Posts of SST (General)	48
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ATTESTED

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25% share initial recruitment	12
75% share for Promotion.	36
04 % Share of promotion of SAT/AT	02
Posts available for promotion	02
Proposed for Promotion	02
Recommended for promotion	02
Balance	01

S. No	S.L No	Name of Official & Present Place of Posting	Date of Birth	Date of Appott: as Regular AT	Qualifica tion	Remarks
1	3	Noor Rahman GHS Jelar	15/12/1963	11/11/1986	MA/B.Ed	Services placed at the disposal of DEO (M) Dir Upper for further posting against SST (General) post.

## 5. Promotion of S STT/TT to SST (General) BPS-16

Total No. of vacant Posts SST (General)	48
25% share initial recruitment	12
75% share for Promotion.	36
04 % Share of promotion of STT/TT	02
Posts available for promotion	02
Proposed for Promotion	02
Recommended for promotion	02
Balance	01

S. No	S.L No	Name of Official & Present Place of Posting	Date of Birth	Date of Appott: as Regular TT	Qualifica tion	Remarks
1	9	Nisar Ul Haq GHS Mitana Doag	18/3/1979	15/3/2005	MA/B.Ed	Services placed at the disposal of DEO (M) Dir Upper for further posting against SST (General) post.

## 6. Promotion of S Qari/Qari to SST (General) BPS-16

Total No. of vacant Posts of SST (General)	48
25% share initial recruitment	12
75% share for Promotion.	36
03 % Share of promotion of S Qari/Qari	01
Posts available for promotion	01
Proposed for Promotion	01
Recommended for promotion	01

S. No	S.L No	Name of Official & Present Place of Posting	Date of Birth	Date of Appott: as Regular Qari	Qualifica tion	Remarks
1	1	Subhan Ud Din GHSS Wari	10/8/1969	14/5/1999	MA/B.Ed	Services placed at the disposal of DEO (M) Dir Upper for further posting against SST (General) post.

## Terms and conditions:-

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining his duty.
- 7 They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he/she is wrongly promoted he/She will be reversed.

**ATTESTED**

*[Signature]*

Dir (U)

15

- 8 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 9 Their posting will be made on School based, they will have to serve at the place of posting, and their service is not transferable to any other station.
- 10 Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

⑤  
①①

(Hafiz Dr. Muhammaed Ibrahim)  
Director  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

4585-90

Endst: No. / File No.2/Promotion SST B-16: Dated Peshawar the 22/2/2019  
Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (M) Dir Upper.
3. District Accounts Officer Dir Upper.
4. Official Concerned.
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
7. M/File

*[Signature]*  
Dy. Director (Estab) <sup>22/2/19</sup>  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

*[Signature]*

ATTACHED

*[Signature]*





# OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)

Dir Upper (Phone # 0944-884100) E-mail: [deomdirupper@gmail.com](mailto:deomdirupper@gmail.com)

## OFFICE ORDER

Consequent upon their promotion from SCTs/CTs,SDMs,STTs,SATs,S.Qaris BPS-15/16 and PSHTs/SPSTs/PSTs BPS-12/14/15 to the post of Secondary School Teachers (SSTs) (General),(Maths:Phy),(Bio:Chem:) noted against each PBS-16 (Rs.18910-1520-64510) plus usual allowance as admissible under the rules on regular basis under the existing policy of the provincial Government, on the terms and conditions given below, vide Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Notification Endst No. 4585-90/F.No.2/Promotion SST B-16 Peshawar the Dated: 22/02/2019 they are hereby further adjusted in the schools noted against each with immediate effect.

### 1. SCT/CT to SST (G)

S.#	S.:#	Name of Teacher	Present School	School where Adjusted	Remarks
1	11	Matiullah	GHSS Swani	GHSS Swani	A.V. Post
2	14	Mumtaz Ahmad	GCMHS Dir	GCMHS Dir	Pay will be active after the retirement of Said Akbar SST (G)
3	19	Khashi Ullah	GHS Chukiatan	GMS Dir Khan	A.V. Post
4	20	Mohammad Ishaq	GHSS Ushera	GHS Achar	A.V. Post
5	21	Khan Daraz Khan	GHSS Wari	GHS Wari	Already Occupied
6	22	Nizamuddin	GHS Daskor	GHS Daskore	Already Occupied
7	23	Mohibullah	GHSS Sheringal	GHS Doon Bala	A.V. Post
8	24	Mohd Amin Khan	GHSS Wari	GHS Jelar	A.V. Post
9	25	Mohd Nazir	GHS Janbhani	GHS Shahikot	A.V. Post
10	27	Rafiullah	GHS Bibiwar	GMS Hattan	A.V. Post
11	28	Mohammad Usman	GCMHSS Dir	GHS Dobando	A.V. Post
12	29	Khalilur Rahman	GHS Pacha Kaley	GHSS Pachakalay	Already Occupied
13	30	Khaista Mohd	GHSS Gandigar	GHSS Pachakalay	A.V. Post
14	32	Shamsur Rahim	GHS Nehag	GHSS Nehag	A.V. Post
15	33	Mohammad Zamin	GHS Nagril	GHS Nagrail	Already Occupied
16	36	Zahoorul Islam	GHSS Patrak	GHSS Patrak	A.V. Post
17	37	Sahibzada Rohullah	GHS Rehankot	GHSS Kass Chinda Kot	A.V. Post
18	38	Bakht Zada	GHS Karkabanj	GHS Karkabanj	Already Occupied

### 2. SDM to SST (G)

1	2	Aziz Ahmad	GHS Gamseer	GHS Ganshall	A.V. Post
2	4	Abdullah	GHS Bin Bala	GMS Sonai	A.V. Post

### 3. STT to SST (G)

1	9	Nisarul Haq	GHS, Miana Doag	GMS Roghano kalay	A.V. Post
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### 4. S.Qari to SST(G)

1	1	Subhan Ud Din	GHSS Wari	GHS Jelar	A.V. Post
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### 5. PSHT,SPST,PST to SST(G)

1	42	Amir Muhammad	GPS Loi Baba	GMS Pataw	A.V. Post
2	249	Muhammad Munir	GPS Mashango Kass	GMS Kass Shingara	A.V. Post
3	260	Sahib Zada	GPS Shaga Amlooknar	GHS Doog Payeen	A.V. Post
4	263	Aurang Zeb	GPS Daskore P No.2	GHS Mattar	A.V. Post
5	269	Muhammad Hayat	GPS Batai	GHS Beyar	A.V. Post
6	270	Sultan Zeb	GPS Shaftalo khwar	GHS Gamdat	A.V. Post
7	279	Muhammad Ali	GPS Janbhatti No.1	GMS Nasrat	A.V. Post
8	289	Alam Zeb	GPS Shakani	GHSS Berari	A.V. Post
9	292	Muhamma Ayaz	GPS Kolal Bandi No.1	GMS Sheratkal	A.V. Post
10	294	Rahat Ullah	GPS Galkore	GMS Bandan	A.V. Post

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**6. SPST to SST(Maths : Phy:)**

S.#	S.:#	Name of Teacher	Present School	School where Adjusted	Remarks
1	1280	Mohammad Wahab	GPS Duro	GHSS Swani	A.V. Post
2	1299	Farid Ullah	GPS Qila Chukyatin	GHS Shahikot	A.V. Post

**7. SPST to SST(Bio: Chem:)**

1	1086	Ihsan Ullah	GPS Markhano	GHSS Berari	A.V. Post
2	1324	Israr Ahmad	GPS Tangai	GHSS Nehag	A.V. Post
3	1403	Mushtaq Ahmad	GPS Tangai	GHS Mattar	A.V. Post

**TERMS AND CONDITIONS:-**

- 01- They would be on probation for a period one year extendable for another one year.
- 02- They will be governed by such rules and regulations as may be issued from government time to time.
- 03- Their services can be terminated at any time, in case their performance is found unsatisfactory during the probation period. In case of miss-conduct they will be preceded under the rules framed from time to time.
- 04- Charge reports should be submitted to all concerned.
- 05- Their enter-se-Seniority on lower post will remain intact.
- 06- No /TA/DA is allowed for joining their new post.
- 07- They will give an undertaking to be recorded in their service books to the effect that if any overpayment is made to them in light of this order will be recovered and if they are wrongly promoted. They will be reversed to the previous post.
- 08- Before handing over charge their document may be checked if they have not the required/relevant qualifications as per rules, they may not be handed over charge of the post.

(ABDUL HAQ)  
 DISTRICT EDUCATION OFFICER (M)  
 DIR UPPER

Endst No 2603-05 /F.No.52/DEO (M)/Estb (S) Dated: 11/11/2019

Copy forwarder for information to the:-

1. Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Dir Upper.
3. Principal/Head Master/In-charge concerned.
4. Teachers concerned.

**ATTESTED**

*[Signature]*

*[Signature]*  
 DISTRICT EDUCATION OFFICER (M)  
 DIR UPPER



## Notification

# SSTs (M) Dir Upper 1 Directorate of Elementary and Secondary Education

KHYBER PAKHTUNKHWA, PESAHWAR.

D-14

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24<sup>th</sup> July, 2014, the following PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (General) in BPS-16 (Rs. 18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted by the District Education Officer concerned.

### A. SST (General)

#### 1. Promotion to Senior PSHT/SPST/PST to SST (General) BPS-16.

2. Total No. of vacant Posts of SST (General)	01
25% share initial recruitment	0
75% share for Promotion.	01
20 % Share of promotion of PSHT/SPST/PST	01
Posts available for promotion	01
Proposed for Promotion	01
Recommended for promotion	01

SNo	S.L No	Name of Official & Present Place of Posting	Date of Birth	Date of Appott: as Regular PST	Qualification	Remarks
1	294	Rahat Ullah GPS Galkor	2/3/1968	1/3/1993	MA//B.Ed	He was promoted to the post of SST (General) but he was junior to S.No.2. Hence his promotion order as SST (General) is hereby withdrawn. His services are placed at the disposal of DEO (M) Dir Upper for further posting against PSHT post.
2	293	Badshah Azim GPS Asharay	14/1/1968	1/3/1993	MA//B.Ed	Services are hereby placed at the disposal of DEO(M) Dir Upper for further posting against V/Post of SST (General).

### Terms and conditions:-

- 1 They shall be on probation for a period of one year extendable to another year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probation period. In case of misconduct, they shall be proceeded against under the rules framed from time to time.

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- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining duty.
- 7 They will give an under taking to be recorded in their service book to the effect that if any over payment is made to them in the light of this order, the same will be recovered and if he/she is wrongly promoted he/She will be reversed.
- 8 Before handing over charge once again their documents may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.



(Hafiz Dr. Muhammad Ibrahim)  
Director  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst: No. 39-43 / File No.2/Promotion SST B-16: Dated Peshawar the 29/7/2019.

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (M) Dir Upper.
3. District Accounts Officer Dir Upper.
4. Official Concerned.
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
7. M/File

  
Dy: Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

  
TESTED  




16

## OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)

Dir Upper (Phone # 0944-884100) E-mail: deomdirupper@gmail.com

### OFFICE ORDER

Consequent upon his promotion from PSHT BPS,15 to BPS-16 to the post of Secondary School Teachers (SST) (General) to the school noted against each in BPS-16 (Rs.18910-1520-64510) plus usual allowances as admissible to him under the rules on regular basis under the existing policy of the provincial Government, on the terms and conditions given below, vide Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar, Notification Endst No. 39-43 F.No.2/Promotion SST B-16 Dated: Peshawar the 29/07/2019 he is hereby further adjusted in the school schools with immediate effect.

### 01-PSHT to SST (G)

S.#	S.#	Name of Teacher	Present School	School where Adjusted	Remarks
1	293	Badshah Azim	GPS Asharay	GHS Jelar	A.V. Post
2	294	Rahat Ullah	GMS Bandan	GPS Asharay	His promotion of BPS 16 (SST) General has been withdrawn by director vide No:39-43 Dated:29/07/2019 and he is reversed to his previous BPS-15 Post & further adjusted as PSHT BPS-15 at GPS Asharay subdivision Wari.

### TERMS AND CONDITIONS:-

- 01- He would be on probation for a period one year extendable for another one year.
- 02- He will be governed by such rules and regulations as may be issued from government time to time.
- 03- His service can be terminated at any time, in case his performance is found unsatisfactory during the probation period. In case of miss-conduct he will be preceded under the rules framed from time to time.
- 04- Charge report should be submitted to all concerned.
- 05- His enter-se-Seniority on lower post will remain intact.
- 06- No /TA/DA is allowed for joining his new post.
- 07- He will give an undertaking to be recorded in his service book to the effect that if any overpayment is made in light of this order will be recovered and if he is wrongly promoted. He will be reversed to the previous post.
- 08- Before handing over charge his document may be checked if he has not the required/relevant qualifications as per rules, he may not be handed over charge of the post.

(MUHAMMAD TAHIR)  
DISTRICT EDUCATION OFFICER (M)  
DIR UPPER

Endst No. 4985-89 F.No.52/DEO (M)/Estb (S) Dated: 31 / 07 / 2019

### Copy forwarder for information to the:-

- 01- Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 02- District Accounts Officer Dir Upper.
- 03- SDEO (M) Wari for information.
- 04- Head master GHS Jelar for information.
- 05- Teachers concerned.

DISTRICT EDUCATION OFFICER (M)  
DIR UPPER

To

*DIRECTOR*  
The (E&SE) Department,  
Khyber Pakhtunkhwa, Peshawar.

*E-17*

Subject: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED 31.07.2019 WHEREBY PROMOTION ORDER DATED 22.02.2019 TO THE POST OF SST (GENERAL) HAS BEEN WITHDRAWN

Respected Sir,

*With due respect it is most humbly stated as under:-*

- ADDE (M)*  
*Amir*  
*7/8/19*
- 1- That the appellant was appointed in your good self Department as PST (BPS-07 now BPS-12) vide order dated 28.02.1993. That right from appointment the appellant is serving the Department quite efficiently and upto the entire satisfaction of his superiors.
  - 2- That during service the appellant was promoted to the post of PSHT (BPS-15) and after promotion the appellant has served the Department at far flung areas of District Dir with all zeal and zest.
  - 3- That appellant while performing his duty as PSHT (BPS-15) and being senior most employee of the E&SE Department was promoted to the post of SST (BPS-16) through Notification dated 22.02.2019. That in response to the said Notification the appellant took over the charge of the said post and started performing his duty at the concerned station quite efficiently.
  - 4- That astonishingly the Director (E&SE) has withdrawn the promotion Notification of the appellant vide impugned order dated 31.07.2019 without assigning any reason and clear justification.
  - 5- That appellant feeling aggrieved from the impugned order dated 31.07.2019 preferred the instant Departmental appeal on the following grounds.
- ADDE*  
*put up*  
*26/8/19*

GROUND:

- A- That the impugned order dated 31.07.2019 is against the law, facts, norms of natural justice and materials on the record, hence not tenable and liable to be set aside.
  - B- That appellant has not been treated by the concerned authority in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
- ATTACHED*  
*g*

- C- That the concerned authority acted in arbitrary and malafide manner while issuing the impugned order dated 31.07.2019.
- D- That no notice has been issued to the appellant prior to the impugned order dated 31.07.2019.
- E- That act and action of the concerned authority is discriminatory while issuing the impugned order dated 31.07.2019.
- F- That the impugned order dated 31.07.2019 is violative of the principle of "Locus Poenitentiae".
- G- That the impugned order dated 31.07.2019 is violative of law and rules, hence not tenable and liable to be set aside.

It is therefore, most humbly prayed that on acceptance of this Departmental appeal the impugned order dated 31.07.2019 may very kindly be set aside and the concerned authority may be directed to restore the appellant on the post of SST (General) (BPS-16) with all back benefits.

Dated: 06.08.2019

Handwritten signature and stamp area.

APPELLANT

Handwritten signature of the appellant.

**RAHAT ULLAH**  
 SST (General) (BPS-16),  
 GMS Bandan, Dir Upper.

NO 5120-1 Dated 06-08-2019

15  
(19)

To

The Director,  
E& SE Khyber Pakhtunkhwa,  
Peshawar.

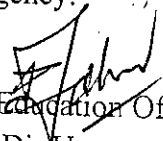
**SUBJECT:- DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED 31.07.2019 WHEREBY PROMOTION ORDER DATED 22.02.2019 TO THE POST OF SST (GENERAL) HAS BEEN WITHDRAWN.**

Enclosed please find herewith an appeal of Mr. Rahat Ullah, SST (General) GMS Bandan Dir Upper against Director E & SE order No. 39-43 dated 29.07.2019 addressed to Secretary E&SE Department for further necessary action please.

(Muhammad Tahir)  
District Education Officer (M)  
Dir Upper

Endst of even No. & date

Copy to : Mr. Hayat Ullah PSHT under transfer to GPS Agency.

  
District Education Officer (M)  
Dir Upper.

**ATTESTED**







DIRECTORATE OF ELEMENTARY & SECONDARY  
EDUCATION KHYBER PAKHTUNKHWA,  
PESHAWAR

F-20

No. \_\_\_\_\_/F.No. 20/Appeals/PST/CT.  
Dated: 11/9/2019.

To /

The District Education Officer  
(Male) Dir Upper.

Subject: - DEPARTMENTAL APPEAL

I am directed to refer to the appeal on the subject cited above and to ask you that the case/appeal in respect of Mr. Rahat Uallah SST GMS Bandan Dir Upper, has been examined/analyzed by this office. Hence inform the appellant concerned that his appeal has been rejected by the Appellate Authority.

*S-d*  
Assistant Director Estab (Male)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst No. 648-49,

Copy of the above is forwarded to: -

1. Mr. Rahat Uallah SST GMS Bandan Dir Upper.
2. PA to Director E&SE local Office.
3. Master File.

*11/9/2019*  
Assistant Director Estab (Male)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

ATTACHED

*[Handwritten signature]*

**VAKALATNAMA**

Before the KP Service Tribunal, Peshawar

OF 2019

Rahat Ullah

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Education Deptt

(RESPONDENT)  
(DEFENDANT)

I/we Rahat Ullah

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

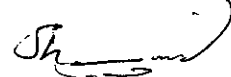
Dated. \_\_\_\_/\_\_\_\_/2019



CLIENT

**ACCEPTED**

**NOOR MOHAMMAD KHATTAK**



**SHAHZULLAH YOUSAFZAI**

&



**MIR ZAMAN SAFI  
ADVOCATES**

OFFICE:  
Flat No.3, Upper Floor,  
Islamia Club Building, Khyber Bazar,  
Peshawar City.  
Mobile No.0345-9383141

**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.**

No.

Appeal No..... 1138 ..... of 29 along with  
..... M. R. Raza ..... Appellant/Petitioner with application

Versus

Secty of K.P. through Secretary (F&SE) Deptt. Respondent  
Respondent No..... I .....

Notice to: Secty of K.P. through Secretary (F&SE) Deptt.  
K.P. Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 20/9 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No..... dated.....

Given under my hand and the seal of this Court, at Peshawar this 20/9.....

Day of..... Sep ..... 2018.

[Signature]  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

30/9

**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
**JUDICIAL COMPLEX (OLD), KHYBER ROAD,**  
**PESHAWAR.**

No.

Appeal No. 1138 of 2019 *along with stay application*  
Mr. Robertullah Appellant/Petitioner  
Versus  
Govt of Peshawar (E&F) Deptt Respondent  
Respondent No. 2

Notice to: - Director (E&F) Deptt KP

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 21-10-2019 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

*along with stay application is attached*  
Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this~~

office Notice No. .... dated .....

Given under my hand and the seal of this Court, at Peshawar this 21/10/19

Day of Sep 20 19

*[Signature]*  
*[Signature]*  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.**

No.

Appeal No. 1138 of 2019 along with  
stay application  
Mr. Rubet Ullah Appellant/Petitioner  
Versus  
Govt of KP, through Secretary (F&E) etc Respondent  
Respondent No. 3

Notice to: - Distt. Filliciation officer (Male)  
Distt. Dir Upper

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 21-10-2019 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

along with stay application  
Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No. .... dated .....

Given under my hand and the seal of this Court, at Peshawar this 25th .....

Day of Sep ..... 2019.

[Signature]  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
**JUDICIAL COMPLEX (OLD), KHYBER ROAD,**  
**PESHAWAR.**

No.

Appeal No.....1138..... of 2019 *abandoned*

.....*Mr. Razaat Ullah*..... Appellant/Petitioner *the appellant*

Versus

*Govt of KP, Human Resources (BPS) etc.*  
..... Respondent

Respondent No.....4.....

Notice to:

- *Mr. Bual Ghani Azim, SET (G) (BPS-16)*

*G.H.S. Jelani, Dir Upper*

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on *21-10-2019* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

*abandoned stay application*  
Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this~~

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....*20th*.....

Day of.....*Sep.*.....2019.

*[Signature]*  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
**JUDICIAL COMPLEX (OLD), KHYBER ROAD,**  
**PESHAWAR.**

No.

Appeal No..... 1138..... of 20 19

Mr. Rahat Ullah..... Appellant/Petitioner  
Versus

Secy E&SE KPK Peshawar..... Respondent  
Respondent No..... 3

Notice to: - The District Education Officer (Male)  
District Dir Upper.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on..... at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No..... dated.....

Given under my hand and the seal of this Court, at Peshawar this..... 18/11

Day of..... NOV 20 19

(for Reply)

M. J. J. Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
**JUDICIAL COMPLEX (OLD), KHYBER ROAD,**  
**PESHAWAR.**

No.

Appeal No.....1138..... of 2019

.....Mr. Rahat Ullah.....Appellant/Petitioner

Versus

.....Sey EOSE KPK Peshawar.....Respondent

Respondent No.....4.....

Notice to: - Mr. Badshah Azim, SST (G) (BPS-16)  
GHS Telar, Dir Upper.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....12/12/2019.....at 8:00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.


Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this....18/12.....

Day of.....Nov.....2019.

(For Reply)

  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.



**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
**JUDICIAL COMPLEX (OLD), KHYBER ROAD,**  
**PESHAWAR.**

No.

Appeal No.....1138..... of 2019.

.....Mr. Rahat Ullah.....Appellant/Petitioner  
Versus

.....Secy EOSE KPK Peshawar.....Respondent  
Respondent No.....I.....

Notice to: - The Govt of KPK through Secretary (EOSE)  
Dept: KPK Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.


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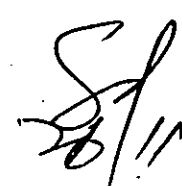
Given under my hand and the seal of this Court, at Peshawar this.....18/12.....

Day of.....Nov.....20 19

(for reply)

  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.



**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.**

No.

Appeal No. 1138 of 2018.  
Mr. Rahat Ullah Appellant/Petitioner

Secy EBSE KPK Peshawar Respondent

Respondent No. 2

Notice to: —

The Director (EBSE Deptt. KPK  
Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 5-12-2018 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 18/11

Day of Nov 2018

(For Reply)

*[Handwritten signature]*

*[Handwritten mark]*

*[Handwritten signature]*

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

قیمت  
50 روپے

26569



ایڈویکٹ: اسد اللہ خان لومونی

بارکونسل/ایسوسی ایشن نمبر: Bc-09-1902

رابطہ نمبر: 03449021721

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: سروسز ٹریبونل پشاور

منجانب: Respondat 4	دعویٰ:
	علت نمبر:
راحت اللہ بنام KPK 100409	مورخہ:
	جرم:
	تھانہ:

**باعث تحریر آنکہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ آن مقام پشاور کیلئے حکیم علی محمد راجہ خان / اسد اللہ خان کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 5/12/2019

الع ہد گواہ شد الع ہد

مقام پشاور کے لیے منظور ہے۔

Attested  
accepted by

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

بادشاہ عظیم صلی اللہ علیہ وسلم کی شان و کرامت کے لیے  
C-21888-2489817-3  
15709-2489817-3

**BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR.**

**Service Appeal No 1138/2019.**

Mr, Rahat Ullah SST(G) GMS Bandan, District Dir Upper.-----Appellant.

**VERSUS**

1. Govt of KPK through Secretary Education, Peshawar.
2. Director of Education, E&SE, KP Peshawar.
3. District Education Officer (M) Dir Upper .
4. Mr, Badshah Azim, SST (G) BPS-16 GHS Jelar, Dir Upper.-----Rrespondents.

**Reply on the behalf of the Respondents.**

**Respectfully sheweth.**

**PERLIMINARY OBJECTIONS.**

01. That the appellant has no cause of action.
02. That the appellant has not come to the service tribunal with clean hands.
03. That the appellant has been , estopped by his own conduct to file the instant appeal.
04. That the appellant has no locus standi.
05. That the appeal is not main table in its present form.
06. That the appeal is time barred.
07. That the appeal is bad due to mis-joinder and non-joinder of necessary parties.

**OBJECTION ON FACTS.**

01. Pertain to the personal record of the appellant, hence need no comments.
02. Pertain to record hence need no comments.
03. Correct,
04. Correct to the extent that the promotion order of the appellant was withdrawn and it is submitted in this regard that the appellant was promoted from PSHT to SST(G) as private respondent No.4 namely Badshah Azim failed to submit ACRs and other relevant documents with the specified period of time. Consequently, the respondent No,4 submitted a departmental appeal before respondent No,2, subsequently the appeal of respondent NO,4 was accepted and henceforth he was promoted in place of the appellant (Seniority list attached as Annex-A)

05. Incorrect, and hence denied.
06. Incorrect, the appellant has not been aggrieved to file the instant case.

**OBJECTIONS ON GROUNDS.**

- A. Incorrect, the impugned order dated 29.07.2019 and 11.09.2019 are according to law, justice and policy.
- B. Incorrect, The appellant has been treated in accordance with law and there is no matter any violation of the article-4 and 25 of constitution of Islamic Republic of Pakistan.
- C. Incorrect, and hence denied.
- D. Incorrect, and it is submitted that there is no matter of any discrimination on the part of the respondents in issuing the impugned order.
- E. Incorrect, the detail reply has been given in para 4, objection on facts.
- F. Incorrect, and it is submitted that action of the respondents by reverting the appellant and promoting the respondent No,4 is according to law, policy, rules as he was senior to the appellant.
- G. That further grounds, with the leave of this honorable court would be argued at time of arguments.

**PRAYER**

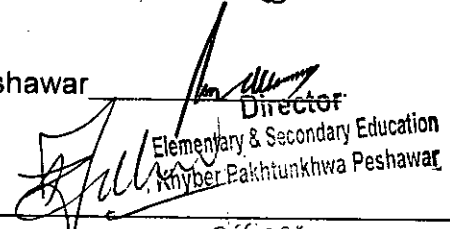
It is therefore, humbly prayed that on acceptance of this comments, the appeal may kindly be dismissed with cost in the favor of respondents please.

**RESPONDENTS**

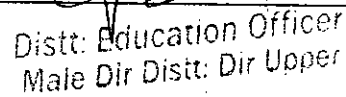
01. The Govt: of Khyber Pakhtunkhwa through Secretary E&SE Peshawar



02. The Director Elementary & Secondary Education Peshawar

  
Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

03. District Education Officer Male Dir Upper

  
Distt: Education Officer  
Male Dir Dist: Dir Upper

Seniority list

①

Annex-A

283	ALAM GIR KHAN	SULTANI RAHMAN KHAN	FA	PTC	15	14/5/1969	DIR U	22/11/1992	6/6/1988	GPS Elokass
284	MUHAMMAD SADIQ	ABDUL JALIL	FA	PTC-CT	15	13/6/1963	DIR U	22/11/1992	9/6/1988	GPS KALKOT
285	FAZAL MALIK	NADAR KHAN	FA	PTC	15	10/4/1970	DIR U	22/11/1992	9/6/1988	GPS SUNDRAWAL
286	Shah Miras Khan	Badshah Khan	M.A	PTC.CT.	15	20/02/66	Dir U	22/11/1992	26/08/88	GPS Banda Kakad
287	Amir Nawaz Khan	Sarwar Khan	SSC	PTC	12	2/1/1961	DIR U	22/11/1992	28/8/1988	GPS Wari No 1
288	Shamroz Khan	Talizer Khan	BA	PST	15	28/02/64	DIR U	22/11/1992	1/9/1988	GPS Kamalai
289	Alam Zeb	Sultana Kahn	MA	PTC, CT, Bed	15	1/4/1970	DIR U	22/11/1992	8/9/1988	GPS Shakani
290	BAKHT MUNIR	AZIZ UL HAQ	FA	PTC	15	3/1/1965	DIR U	22/11/1992	12/12/1988	GMPS Miani Sar
291	GUL ZADA	AMIN SHAH	FA	PTC	15	15/2/1971	DIR U	22/11/1992	18/03/1992	GPS Dad band
292	MUHAMMAD AYAZ	KHUDA DAD KHAN	BA	PTC, CT, Bed	15	8/11/1972	DIR U	22/11/1992	18/03/1992	GPS Kulal Bandi No.1
293	Badshah Azeem	Mian Gul zarin	MA	PTC,CT,B.Ed	15	14/01/68	DIR U	1/3/1993	1/3/1993	GPS Ashari
294	RAHAT ULLAH	MAZ ULLAH KHAN	MA	PTC-B.Ed	15	3/2/1968	DIR U	1/3/1993	1/3/1993	GPS Besho No.2
295	UMER WAHAB	ZAMAN KHAN	MA	PTC, CT, Bed	15	15/07/1969	DIR U	1/3/1993	1/3/1993	GPS Jabbi
296	WAHID UDDIN	ZAIN UL WAHIDIN	MA	PTC-B.Ed	15	2/10/1969	DIR U	1/3/1993	1/3/1993	GPS KOLAL BANDAI NO.2
297	HABIB UR RAHIM	FAZAL RAHIM	FA	PTC	15	2/1/1971	Dir U	1/3/1993	1/3/1993	GPS SADIQA BANDA
298	GUL ZARIN KHAN	ZAMIN KHAN	FA	PST-CT	15	1/4/1972	DIR U	1/3/1993	1/3/1993	GPS Achar Payeen
299	NIAZ MUHAMMAD	SARDAR ALI KHAN	BA	PTC-CT-B.Ed	15	12/5/1973	DIR U	1/3/1993	1/3/1993	GPS KANDOW JABBER
300	BAKHTIAR ZAMIN	MUHAMMAD AMIN	BA	PTC-B.Ed	15	6/7/1973	DIR U	1/3/1993	1/3/1993	GPS Urya Khel
301	MUHAMMAD TAHIR KHAN	MUHAMMAD SHERIN	BA	PTC-CT-B.Ed	15	3/10/1973	DIR U	1/3/1993	1/3/1993	GPS Urya Khal
302	Attaullah Khan	Shaher badahar Khan	MA	PTC,CT	15	12/03/74	DIR U	01/03/93	01/03/93	GPS Kakad (P)
303	HAMEED ULLAH	MOHAMMAD YOQUB	BA	PTC	15	15/06/1972	DIR U	15/03/1993	15/03/1993	GPS Katan Bala
304	Khawaja Nizamul Haq	Rafiq Haq	BA	PST, CT	15	1/7/1972	DIR U	15/03/1993	15/03/93	GPS Kass Banda
305	ABDUL KARIM	GUL IBRAHIM KHAN	FA	PTC	15	12/5/1967	DIR U	7/4/1993	4/11/1986	GPS SHAHOOR PAYEEN
306	MUHAMMAD NABI	HABIB UL HASAN	SSC	PTC	12	14/3/1969	DIR U	7/4/1993	11/5/1987	GPS KOT KASS
307	Nawroz Khan	Talizer Khan	MA	PST,CT, Bed	15	20/04/68	DIR U	7/4/1993	25/08/88	GPS Nehag
308	MOHAMMAD SAEED	QAZI MOHAMMAD	SSC	PTC	9	1/3/1966	DIR U	24/04/1993	22/5/1985	GPS GADAI (SAMANG)
309	Pervaz Khan	Mautabar Khan	FA	PTC	15	15/04/65	DIR U	7/9/1993	1/10/1989	GPS shahi bagh
310	HAMEED ULLAH	SHAH ZARIN	SSC	PTC	12	18/5/1963	DIR U	7/9/1993	1/10/1989	GPS KASS BARIKOT
311	MAHBOOB UR RAHMAN	SAHIB ALI	SSC	PTC	12	6/4/1967	DIR U	7/9/1993	2/10/1989	GPS HAJI ABAD
312	JEHAN ZEB	MUSHRAF KHAN	MA	PTC-B.ED	15	5/3/1970	DIR U	7/9/1993	1/10/1989	GPS Sangar
313	RAHMAT HADI	SAID AKBAR	FA	PTC	15	5/5/1971	DIR U	7/9/1993	3/10/1989	GPS JABRAI
314	HAKIM KHAN	FAQIR MUHAMMAD	FA	PTC	15	2/1/1971	DIR U	7/9/1993	7/6/1990	GPS Shong
315	RAHMAT KARIM	ABDUL KARIM	FA	PTC	12	5/2/1972	DIR U	7/9/1993	13/6/1990	GPS ANAR
316	REHMAT ZARIN	ZAIR MUHAMMAD	MA	PTC-CT	15	3/6/1970	DIR U	8/9/1993	8/9/1993	GPS KHAROW ROKHAN
317	ZAHEEN ULLAH	MUHAMMAD AZIM	FA	PTC	15	8/6/1972	DIR U	8/9/1993	8/9/1993	GPS SADIQA BANDA
318	ABDUR RAHIM	FAZAL RAHIM	FA	PTC	15	1/5/1973	DIR U	8/9/1993	8/9/1993	GPS Ganshall P Ushari
319	IHSAN ULLAH	ABDUL MAHMOOD	FA	PTC	15	15/12/1970	DIR U	22/06/1993	22/6/1993	GMPS KHOWAR JABBAR
320	MUHAMMAD SHAH	QUDRAT SHAH	SSC	PTC	12	12/7/1964	DIR U	25/12/1993	14/6/1982	GPS KASS BARIKOT
321	SAID MAHMOOD SHAH	WALI RAHMAN	MA	PTC-CT	15	1/3/1974	DIR U	25/12/1993	2/6/1992	GPS GANDIGAR NO.3 BALA
322	WALI RAHMAN	MUHAMMAD AZIM KHAN	SSC	PTC	12	2/1/1960	DIR U	25/12/1993	21/05/1985	GPS GUMADAND
323	MOHAMMAD SHAH KHAN	GHULAM DASTAGIR	SSC	PTC	12	12/06/65	DIR U	25/12/1993	09/06/85	GPS KHAD GAL

Distr: Education Officer  
Male Dir Distt: Dir Upper

Date: Peshawar the 27/6/2019

(2)

The District Education Officer,  
(Male) Dir Upper.

Subject: -  
Memo:

APPEAL FOR PROMOTION TO SST (GENERAL).

I am directed to refer to the subject cited above and to state that the competent authority has been pleased to accept the appeal in respect of Mr. Badshah Azeem PSHT GPS, Asharay District Dir upper regarding his promotion to SST (General) post in place of Mr. Rahatul ah PSHT already promoted.

In this regard, I am further directed to ask you to submit self contained working paper this office immediately for further necessary action.

W  
29/6/2019  
Assistant Director (Estab)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa.

Endst: No. \_\_\_\_\_

- Copy of the above is to:-  
1. PA to Director (E&SE) Khyber Pakhtunkhwa.

W  
27/6/19

Assistant Director (Etab)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

[Signature]  
Distt: Education Officer  
Male Dir Distt: Dir Upper

AT/O(S)  
DO CS directed  
[Signature]  
01/7/19

3

**OFFICE OF THE DISTRICT EDUCATION OFFICER  
MALE DIR UPPER**

844-881400-Fax-880411 E-mail [emisdirupper@gmail.com](mailto:emisdirupper@gmail.com)

900 / F. No 118/DEO(M)/ADO(P)Estab: Dated Dir Upper / 0 / 07/2019.

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

**Subject: APPEAL FOR PROMOTION TO SST (GENRERAL)**  
**Memo: -**

Reference to the letter No. 5271/f.No05/SST (M) Deptt: Promotion dated 27.06.2019 on the subject cited above.

It is submitted that the appeal for promotion in respect of Mr. Badshah Azim PSIT GPS Ashari was accepted by your good office.

All the relevant Documents-Acrs Working papers etc are sent herewith for further necessary action please.

Endst: Even No. & Date.

Cc:-

*[Signature]*  
DISTRICT EDUCATION OFFICER  
MALE DIR UPPER

*[Signature]*  
Distt: Education Officer  
Male Dir Distt: Dir Upper

DISTRICT EDUCATION OFFICER  
MALE DIR UPPER

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*[Handwritten notes and signatures in the margin]*



(4)

WORKING PAPERS FOR DEPARTMENTAL PROMOTION COMMITTEE FOR THE PROMOTION FROM  
PSHT / SPST / PSTs (M) TEACHER TO SST General B-16

Recruitment

40% by promotion from SCT/CT	0
20% by promotion from PSHT/SPST/PST	0
4% by promotion from SDM/DM	0
4% by promotion from SAT/AT	0
4% by promotion from STT/TT	0
3% by promotion from S.Qari . Qari	0
G. Total	

LIST OF PSHTs TEACHERS (M) FOR THE PROMOTION OF SST General B-16

Total Expected SST (G) Vacancy=		in District Dir Upper .			20 % Share of PSHT/SPST/PST		Genrel SST= 0		Remarks
S.No.	Sen/List No.	Name of Teacher	Present place of posting	DOB	D/O Passing PTC	Acad:Qualif.	Prof. Qualif.	Wether Eligible or Not or Not	
1	294	RAHAT ULLAH	GPS Gal Kor	2/3/1968	1/3/1993	MA	PTC+B.Ed	Not eligible	He was junior to S.No-2 but promoted on 22.02.2019
2	293	Bad Shan Azim	GPS Asharai	14.01.1966	1/3/1993	MA	PTC+B.Ed	Eligible	He was senior to S.No-1, but deprived from promotion

CERTIFICATE

- 1 It is certified that all the PSHT/SPST/PST (M) included in the panel for the promotion to SST General Post.
- 2 Hold the posts on regular basis and none of them is holding the post on adhoc/acting chage basis/ contract.
- 3 Have completed the required minimum length of qualifying service and qualifications as required for promotion to the post of SST under the rules.
- 4 None of them is on deputation to any organization under the dedral / Provincial / Autonomous / Semi autonomous / Internation Organization.
- 5 Neither any disciplinary /departmental proceedings/Anti corruption/judicial enquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.
- 6 No one is on long leave /Ex-Pakistan leave.
- 7 Their ACRs,Synopsis are free from adverse remarks.
- 8 He is all alive and serving.
- 9 His appointment order against PSHT / SPST/PST post is attached herewith.
- 10 The Seniority list of B-16 officers is final, undisputed and not subjudice.
- 11 The Departmental Promotion Committee is requested to determine the suitability of the above PSHT for promotion to SS B-16 post with immediate effect
- 12 Seioner most/Eligible PST/SPT/PSHT teachers have been included in the list.

*[Signature]*  
 Distt. Education Officer  
 Male Dir Distt. Dir Upper

*[Signature]*  
 DISTRICT EDUCATION OFFICER  
 MALE DIR UPPER

5

THE SUB-DIVISIONAL EDUCATION OFFICER (M) PRY; WARI DIR UPPER.

4544 / Date Wari the 09/07/2019

The Distt; Education officer  
(M) Dir upper.

Subject:- SUBMISSION OF PER,s for promotion of PSHT to SST.  
Memo:-

It is stated for your good self that the PER,s of the following PST teacher of Sub-Division Wari Dir upper for the cited subject is hereby submitted for further N/action please.

S.No.	Name of Teachers	Deg:	Name of School	D/O 1 <sup>st</sup> Apptt:
01	Badshah Azim	PSHT	GPS Ashary	01/03/1993

Distt. Education Officer  
Male Dir Distt. Dir Upper.

Sub-Divisional Education officer  
(M) pry; Wari Dir upper.

Handwritten notes on the left margin: s, b, s, L.S, de, al, B, 29, 1



② SSTs (M) Dir Upper 1

# Directorate of Elementary and Secondary Education

KHYBER PAKHTUNKHWA, PESAHWAR.

## Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24<sup>th</sup> July, 2014, the following PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (General) in BPS-16 (Rs. 18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted by the District Education Officer concerned.

### A. SST (General)

#### 1. Promotion to Senior PSHT/SPST/PST to SST (General) BPS-16.

2. Total No. of vacant Posts of SST (General)	01
25% share initial recruitment	0
75% share for Promotion.	01
20 % Share of promotion of PSHT/SPST/PST	01
Posts available for promotion	01
Proposed for Promotion	01
Recommended for promotion	01

SNo	S.L No	Name of Official & Present Place of Posting	Date of Birth	Date of Appott: as Regular PST	Qualification	Remarks
1	294	Rahat Ullah GPS Galkor	2/3/1968	1/3/1993	MA/B.Ed	He was promoted to the post of SST (General) but he was junior to S.No.2. Hence his promotion order as SST (General) is hereby withdrawn. His services are placed at the disposal of DEO (M) Dir Upper for further posting against PSHT post.
2	293	Badshah Azim GPS Asharay	14/1/1968	1/3/1993	MA/B.Ed	Services are hereby placed at the disposal of DEO(M) Dir Upper for further posting against V/Post of SST (General).

### Terms and conditions:-

- 1 They shall be on probation for a period of one year extendable to another year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probation period. In case of misconduct, they shall be proceeded against under the rules framed from time to time.

Distt: Education Officer  
Male Dir Distt: Dir Upper

1059  
3/8/19

- Charge report should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining duty.
- 7 They will give an under taking to be recorded in their service book to the effect that if any over payment is made to them in the light of this order, the same will be recovered and if he/she is wrongly promoted he/She will be reversed.
- 8 Before handing over charge once again their documents may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(Hafiz Dr. Muhammad Ibrahim)  
Director  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst: No. 39-43 / File No.2/Promotion SST B-16: Dated Peshawar the 29/7 2019.  
Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (M) Dir Upper.
3. District Accounts Officer Dir Upper.
4. Official Concerned.
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
7. M/File

*Fahim*  
Distt. Education Officer  
Male Dir Distt: Dir Upper

*[Signature]*  
Dy: Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar



DESPATCHER  
Peshawar (E&SE)  
PK Peshawar

(B)

## OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)

Dir Upper (Phone # 0944-884100) E-mail: [deomdirupper@gmail.com](mailto:deomdirupper@gmail.com)

### OFFICE ORDER

Consequent upon his promotion from PSHT BPS,15 to BPS-16 to the post of Secondary School Teachers (SST) (General) to the school noted against each in BPS-16 (Rs.18910-1520-64510) plus usual allowances as admissible to him under the rules on regular basis under the existing policy of the provincial Government, on the terms and conditions given below, vide Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Notification Endst No. 39-43 F.No.2 Promotion SST B-16 Dated: Peshawar the 29/07/2019 he is hereby further adjusted in the school schools with immediate effect.

### 01-PSHT to SST (G)

S.#	S.#	Name of Teacher	Present School	School where Adjusted	Remarks
1	293	Badshah Azim	GPS Asharay	GHS Jelar	A.V. Post
2	294	Rahat Ullah	GMS Bandan	GPS Asharay	His promotion of BPS 16 (SST) General has been withdrawn by Director vide No:39-43 Dated:29/07/2019 and he is reversed to his previous PSHT BPS-15 Post & further adjusted as PSHT BPS-15 at GPS Asharay subdivision Wari.

### TERMS AND CONDITIONS:-

- 01- He would be on probation for a period one year extendable for another one year.
- 02- He will be governed by such rules and regulations as may be issued from government time to time.
- 03- His service can be terminated at any time, in case his performance is found unsatisfactory during the probation period. In case of miss-conduct he will be preceded under the rules framed from time to time.
- 04- Charge report should be submitted to all concerned.
- 05- His enter-se-Seniority on lower post will remain intact.
- 06- No TA/DA is allowed for joining his new post.
- 07- He will give an undertaking to be recorded in his service book to the effect that if any overpayment is made in light of this order will be recovered and if he is wrongly promoted. He will be reversed to the previous post.
- 08- Before handing over charge his document may be checked if he has not the required/relevant qualifications as per rules, he may not be handed over charge of the post.

*(Signature)*  
District Education Officer  
Male Dir Distt: Dir Upper

(MUHAMMAD TAHIR)  
DISTRICT EDUCATION OFFICER (M)  
DIR UPPER

Endst No. 4985-89 / F.No.57/DEO (M)/Estb (S) Dated: 31/07/2019

### Copy forwarder for information to the:-

- 01- Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 02- District Accounts Officer Dir Upper.
- 03- SDEO (M) Wari for information.
- 04- Head master GHS Jelar for information.
- 05- Teachers concerned.

*(Signature)*  
DISTRICT EDUCATION OFFICER (M)  
DIR UPPER



9

F-20

**DIRECTORATE OF ELEMENTARY & SECONDARY  
EDUCATION KHYBER PAKHTUNKHWA,  
PESHAWAR**

No. \_\_\_\_\_ /F.No. 20/Appeals/PST/CT.  
Dated: 11/9/ /2019.

To

The District Education Officer  
(Male) Dir Upper.

Subject: - DEPARTMENTAL APPEAL

I am directed to refer to the appeal on the subject cited above and to ask you that the case/appeal in respect of Mr. Rahat Uallah SST GMS Bandan Dir Upper, has been examined/analyzed by this office. Hence inform the appellant concerned that his appeal has been rejected by the Appellate Authority.

S-d  
Assistant Director Estab (Male)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst No. 648-49

Copy of the above is forwarded to: -

1. Mr. Rahat Uallah SST GMS Bandan Dir Upper.
2. PA to Director E&SE local Office.
3. Master File.

~~11/9/2019~~  
Assistant Director Estab (Male)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar  
Allin

ATTACHED

d

NO 5120-1 Dated 06-08-2019

To

The Director,  
E & SE Khyber Pakhtunkhwa,  
Peshawar.

SUBJECT:- DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED 31.07.2019 WHEREBY PROMOTION ORDER DATED 22.02.2019 TO THE POST OF SST (GENERAL) HAS BEEN WITHDRAWN.

Enclosed please find herewith an appeal of Mr. Rahat Ullah, SST (General) GMS Bandan Dir Upper against Director E & SE order No. 39-43 dated 29.07.2019 addressed to Secretary E&SE Department for further necessary action please.

(Muhammad Tahir)  
District Education Officer (M)  
Dir Upper

Endst of even No. & date

Copy to : Mr. Hayat Ullah PSHT under transfer to GPS Agency.

District Education Officer (M)  
Dir Upper.

ATTESTED



11

**BEFORE THE SERVICE TRIBUNAL PESHAWAR.**

SA No.1138/2019.

Rahatullah,SST (G) (BPS-16)GMS Bandan Distriet Dir Upper.-----Appellant.

Versus

Govt: of KPK and others -----Respondents.

**AFFIDAVIT.**

I, Mr; Sardaraz Khan ADEO (Lit) o/o DEO Male Dir Upper, do hereby solemnly affirm and declare on oath that the contents of the joint written reply submitted by respondents No.1 to 3 are true and correct to the best of my knowledge and belief as per office record and that nothing has been concealed from this Hon: Court.

Deponent



**SARDARAZ KHAN**

**ADEO(LIT) OFFICE OF THE DISTRICT  
EDUCATION OFFICER MALE  
DIR UPPER.**

CNIC. NO.15702-2476972-1