

PESHAWAR KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR
AT CAMP COUR ABBOTTABAD

Service Appeal No. 6312/2021

BEFORE: **MRS. ROZINA REHMAN** ... **MEMBER (J)**
 MISS. FAREEHA PAUL ... **MEMBER (E)**

Muhammad Nawaz S/O Muhammad Aslam Junior Clerk Government High School Bagh R/O Bagnoter Tehsil & District Abbottabad.

... (*Appellant*)

Versus

Secretary to Government Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar and 07 others.

... (*Respondents*)

Mr. Sardar Muhammad Azeem
Advocate

...

For appellant

Mr. Riaz Khan Paindakhel
Asstt. Advocate General

...

For respondents

Date of Institution.....16.06.2021

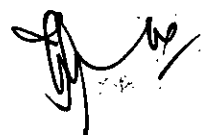
Date of Hearing.....13.06.2022

Date of Decision.....13.06.2022

JUDGEMENT

FAREEHA PAUL, MEMBER (E): The service appeal in hand has been instituted under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, against the promotion order dated 15.02.2021, under which the name of appellant for promotion against the post of Senior Clerk (BPS-14) was deferred without any sufficient reason and respondents No. 4 to 8 were promoted who were junior to him.

2. Brief facts of the case, as given in the memorandum of appeal, are that the appellant was appointed Naib Messenger in the office of District Education Office



(Female) Primary, Abbottabad vide order dated 14.05.1991. He was promoted to the post of Junior Clerk (BPS-5) vide order dated 20.01.1997, and was placed at serial No. 619 in the seniority list of 2020. The respondent department promoted the Junior Clerks (BPS-11) to the post of Senior Clerks (BPS-14) vide order dated 15.02.2021, but the appellant was not granted that promotion. He appealed against that order on 16.02.2021, which was not honoured; hence this service appeal.

3. Respondents were put on notice who submitted written replies/comments on the appeal. We heard the learned counsel for the appellant as well as the Assistant Advocate General and perused the case file with connected documents minutely and thoroughly.

4. Learned counsel for appellant contended that he had been deferred from promotion without any sufficient reason and those junior to him were promoted. He argued that the ground on which the appellant had been deferred was not correct because he had submitted his Performance Evaluation Reports in time to his superiors. He also informed that the appellant got retired in April 2021.


5. Learned Assistant Advocate General invited attention towards the working paper prepared for the meeting of Departmental Promotion Committee, which stated in the remarks column that the appellant Muhammad Nawaz had not submitted his PERs. Based on that the Departmental Promotion Committee deferred his case. An appeal made by the appellant to the DEO (M) Abbottabad was presented by the learned Assistant Advocate General according to which the appellant himself stated that he on 09.01.2021 submitted his ACRs for 5 years to the Director Elementary & Secondary Education Peshawar. The appeal further stated that the ACRs were submitted after the meeting of DPC was held and he requested to consider his case for promotion.



6. The record available before us clearly shows that the appellant was not considered for promotion and that he was deferred because his Performance Evaluation Reports were not submitted. The appellant himself admitted that he submitted his five years PERs on 09.01.2021, whereas, meeting of Departmental Selection Committee was held on 17.09.2020, which was late by almost four months. It is a failure on the part of appellant that he did not submit his PERs to his reporting authority in time every year and his case was then deferred on that ground. Then in the meantime he retired from service in April 2021 and no meeting of DPC could be held after September 2020 till his retirement.

7. In view of all the facts given above, the appeal in hand stands dismissed. Parties are left to bear their own costs. Consign.

8. *Pronounced in open court in Abbottabad and given under our hands and seal of the Tribunal this 13th day of June, 2022.*


(ROZINA REHMAN)
Member (J)



(FAREEHA PAUL)
Member (E)

Service Appeal No. 6312/2021

Mr. Sardar Muhammad Azeem, Advocate for the appellant present.
Mr. Riaz Khan Paindakhel, Assistant Advocate General for the respondents present. Arguments heard and record perused.

2. Vide our detailed judgment containing 03 pages, we have arrived at the conclusion that the appellant was not considered for promotion and that he was deferred because his Performance Evaluation Reports were not submitted. The appellant himself admitted that he submitted his five years PERs on 09.01.2021, whereas meeting of Departmental Selection Committee was held on 17.09.2020, which was late by almost four months. It is a failure on the part of appellant that he did not submit his PERs to his reporting authority in time every year and his case was then deferred on that ground. Then in the meantime he retired from service in April 2021 and no meeting of DPC could be held after September 2020 till his retirement. In view of all the facts, the appeal in hand stands dismissed. Parties are left to bear their own costs. Consign.

3. *Pronounced in open court in Abbottabad and given under our hands and seal of the Tribunal on this 13th day of June, 2022.*


(ROZINA REHMAN)
Member (J)




(FAREEHA PAUL)
Member (E)

06.08.2021

Counsel for the appellant present. Preliminary arguments heard.

Points raised need consideration. The appeal is admitted for full hearing, subject to all just and legal objections including that of limitation for determination during full hearing. 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 in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 13.10.2021 before the D.B at camp court, Abbottabad.

Appellant Deposited
Security & Process Fee


6/8/21


Chairman

12.10.2021

Counsel for the appellant present. Mr. Sohail Ahmed Zeb, Litigation Officer alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for official respondents No. 1 to 3 and private respondents No. 4 & 5 in person present. None present on behalf of private respondents No. 6 to 8, hence they are proceeded ex-parte.

Written replies on behalf of official respondents as well as private respondents No. 4 & 5 submitted, which are placed on file. To come up for arguments on 14.02.2022 before the D.B at Camp Court Abbottabad.


(Salah-Ud-Din)
Member (Judicial)
Camp Court A/Abad




Chairman
Camp Court A/Abad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - 6312/21 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/06/2021	<p>The appeal of Mr. Muhammad Nawaz resubmitted today by post through Sardar Muhammad Azeem Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench Peshawar. Notices be issued to appellant/counsel for preliminary hearing to be put up there on- <u>06/08/2021</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 946/2018

Date of Institution ... 31.07.2018

Date of Decision 27.07.2021



AsadUllah Khan, Section Officer Home Department, Civil Secretariat, Peshawar.
... (Appellant)

VERSUS

The Government of Khyber Pakhtunkhwa, through Secretary Establishment
Department, Civil Secretariat, Peshawar and two others.
... (Respondents)

Present:

MR. AMJAD ALI,
Advocate

--- For Appellant.

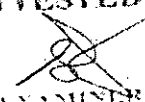
MUHAMMAD ADEEL BUTT,
Additional Advocate General

--- For respondents.

AHMAD SULTAN TAREEN
ROZINA REHMAN

--- CHAIRMAN
--- MEMBER(Judicial)

ATTESTED


CHAIRMAN
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

JUDGEMENT

AHMAD SULTAN TAREEN, CHAIRMAN:-The appellant named above invoked the jurisdiction of this Tribunal through service appeal described above in the heading challenging thereby the recommendation of Provincial Selection Board (PSB) as to deferment of his promotion and purporting the same being against the facts and law on the subject.

02. The facts precisely include that appellant was serving as Section Officer (BS-17). The PSB met on 10.05.2016 and as result of this meeting, the promotion case of the appellant to the post of BS-18 was deferred due to lack of mandatory training. The respondents offered 14 weeks training for promotion to BS-18 to the appellant which he successfully completed vide letter dated 06.12.2016. On 28.12.2016, meeting of PSB was held but again promotion of the appellant was deferred due to

pending inquiry against him. Feeling aggrieved, he filed departmental appeal on 16.01.2017 which was rejected vide order dated 18.07.2018. As a matter of next remedy, present service appeal was preferred and admitted for full hearing with notice to the respondents. They on attending the proceedings have filed written reply/comments refuting the claim of appellant for the relief as sought by him in the memorandum of appeal.

03. We have heard the arguments and perused the record.

04. It was argued on behalf of the appellant that the facts and grounds brought to fore in the memorandum of appeal were sufficient for setting aside the recommendation of P.S.B as to deferment of appellant's promotion but in view of the changed circumstances, no need is left to argue the appeal on its facts and ground; when the appellant has been promoted during pendency of this appeal. The learned counsel for the appellant extended his arguments for amendment of the appeal. He argued that this Tribunal is competent to allow the amendment in appeal and in case of the particular amendment as sought for this appeal, it will shorten the course of litigation. However, learned A.A.G opposed the arguments of the appellant's counsel with submissions that the appeal has become infructuous when the main relief as sought has been granted to the appellant out of court. It was further submitted that the appellant is not entitled to press for proforma promotion by seeking amendment in present appeal.

ATTESTED


EXAMINER
Khayyar Pakhtakhsa
Service Tribunal
Peshawar

05. In view of the facts noted herein above, it is an undeniable fact that name of _____ the appellant was included in the working paper for promotion from BS-17 to BS-18 for consideration of PSB in its meeting held on 10.05.2016. His name is listed at serial No.12 of the table containing the recommendation of the PSB as part of the minutes of said meeting of PSB on the subject of promotion of PMS (BS-17) Officer to BS-18. Copy of the said minutes is available on file. According to _____

220). Reliance upon the said judgment in the precedent law is quite constant, where the application of moulding of relief in view of changed circumstances is deemed necessary by the superior courts. However, application of this principle is subject to certain conditions as deducible from the jurisprudence having so far developed under the precedent law relating to the said principle and may be enumerated as follows:-

1. That the relief, as claimed originally has, by reason of subsequent events, become inappropriate or cannot be granted.
2. That taking note of such subsequent event or changed circumstances would shorten litigation and enable complete justice being done to the parties; and.
3. That such subsequent event is brought to the notice of the court promptly and in accordance with the rules of procedural law so that the opposite party is not taken by surprise.

ATTESTED


EXAMINER
System-Paid/Unpaid
Service Tribunal
Peshawar

06. Testing the case of the appellant on touchstone of the condition necessary for application of moulding relief, the relief as sought by the appellant originally in his present appeal has, by reason of his promotion through notification dated 21.01.2021, has become infructuous. On the other hand, the Appellant is still aggrieved believing that he should have been granted promotion from the date when his case was submitted to PSB for the first time and deferred.

07. Taking notice of Appellant's promotion by the said notification dated 21.01.2021 coupled with his grievance, we are constrained to observe that this subsequent event if taken in to account for the sake of justice, a question is made out whether the appellant was entitled for promotion from the date when his case for the first time was deferred by PSB or from the immediate effect as given to him vide notification dated 21.01.2021. If this question is left undetermined and the appellant appeal at hand is dismissed having become infructuous, it will result into

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

5

multiplicity of proceedings including that the appellant has to file departmental appeal for seeking proforma promotion from the date of his first deferment, and if he fails to get redressal of his prayer in departmental appeal: he will have to file the service appeal which consequently will engage the department for written reply/comments and then it will engage this Tribunal to decide the said appeal ultimately by determination of the same question having no come up here before us. So, we are of the considered opinion that if the stated question is taken for determination here in this appeal, it will necessarily result in shortening of the litigation and enabling complete justice being done to the parties. Moreover, the respondents are also not being taken by the surprise for determination of the said question when the appellant has already moved civil miscellaneous application for amendment of the service appeal in pursuance to the subsequent event of promotion notification dated 21.01.2021 of the appellant. Again it will result in to multiplicity of the proceedings if we go after disposal of the said application asking the respondents to file their reply, hearing the arguments then passing the order certainly at risk of challenge by either party feeling aggrieved. Therefore, we deem it in interest of the parties and to avoid multiplicity of proceedings to restrain ourselves from disposal of the application for amendments of appeal albeit it will remain part of the main file; and we will prefer to take up the question formulated above for determination as to justifiable date of promotion of the appellant.

18. It is an undeniable fact that the concerned department extended the benefit to the appellant by including his name firstly in the working paper presented before PSB on 10.05.2016, 29.06.2016, 27.07.2016 and 29.08.2016 but his promotion was deferred mainly for the reason that he had not undergone training mandatory for promotion. However, the appellant was found fit for promotion in meeting of PSB held on 28.12.2016 after his having undergone the training which previously resulted in to deferment of his promotion but at this time, his promotion was again

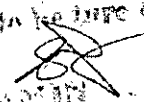
ATTESTED

EXAMINED
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

deferred due to pendency of an enquiry against him. The given account of deferment of appellant's promotion successively leads to an inference that the same in his case was owing to the circumstances beyond his control. However, when the circumstances changed, he now has been promoted to the higher post with immediate effect on 21.01.2021. It is a matter of law in light of second explanation to Rule-17 of the Khyber Pakhtunkhwa (Appointment, Promotion and Transfer) Rules 1989 that the supersession of a senior person strips him off from the right of his seniority over a junior person promoted in consequence of supersession of the former notwithstanding the effect that he i.e. former was also subsequently promoted but there is a rider in the same explanation that the junior person have not been deem to have superseded a senior person, if the case of a senior person is deferred for the time being for want of certain information or for incompleteness of record or for any other reason not attributed to his fault or demerit. When juxtaposing case of the appellant to the said rider, the nomination of a government servant for mandatory training for promotion is a matter of discretion of the competent authority and a civil servant cannot compel the department for his nomination. In this eventuality, the reason of absence of the mandatory training is not attributable to the civil servant. However, there can be another eventuality that a civil servant is nominated for training but he fails to avail the chance; he in case of such eventuality is at risk of attribution of lacking of the necessary training for promotion and if in the matter of such eventuality, the promotion of a civil servant is deferred; he may not be able to claim proforma promotion. Anyhow, the case of appellant before us is one attracting the first eventuality that he was not nominated for training. Therefore, his deferment on such count is not workable to deprive him from the right of seniority at his right place with those colleagues who got promotion when the promotion of the appellant was for the first time deferred for want of his mandatory training. As far as the deferment of appellant promotion,

linked with enquiry pending against him; is concerned; his exoneration from the same obviously paved the way for his promotion made vide notification dated 21.01.2021. Henceforth, the reason of pendency of enquiry, if was attributable to the appellant in deferment of his promotion on 28.12.2016., has now vanished. As cumulative effect of the said discussion, the appellant is held entitled for proforma promotion from 10.05.2016 when his name reflected in the working paper for the first time came under consideration before PSB necessitating its actualization of this proforma promotion under due course. This appeal stands disposed of in the given terms with direction to the respondents to issue necessary corrigendum of the notification dated 21.01.2021 accordingly. There is no order as to costs. File be consigned to the record room.

ANNOUNCED
27.07.2021

Certified to be true copy

 J. N. SINGH
 Teacher (B.Ed.) Alwa
 Service Tribunal
 Jaipur

This is an appeal filed by Mr. Muhammad Nawaz today on 09/4/2021 against the order dated 15.02.2021 against which he preferred/made departmental appeal/ representation on 16.02.2021 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/Counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies.

- 1- Addresses of respondent no. 5 to 8 are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Annexures-C & D of the appeal are illegible which may be replaced by legible/better one.
- 3- Appeal has not been flagged/annexed annexures' marks.
- 4- Eleven more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

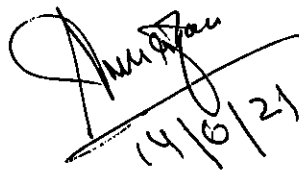
No. 680 /ST,

Dt. 09/04 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Sardar Muhammad Azeem Adv.
High Court A.Abad.

After Removal of objections
Rea Submitted.


14/6/21

Before KPK Service Tribunal Peshawar

Muhammad Nawaz _____ Appellant
V/S

Secretary to Government etc _____ Respondent

Service Appeal

Index

S. No	Description Of document	Annexure	Page
1	Appeal		1 to 4
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4	Copy of seniority list	C	8 to 10
5	Copy of Promotion order	D	11 to 13
6	Copy of Departmental appeal	E	14
7	Copy of Order dated 24-2-2021	F	15
8	Waqalatnama		16



Muhammad Nawaz
Appellant through counsel
Sardar Muhammad Azeem
Advocate Abbottabad. office No 6
Lawyer Chambers Sher Pao Plaza
Abbottabad

Dated: 08-04-2021

Note =

copies for Respondents
submitted after Admission
of Appeal 11 Copies for Respondents
attached

6312/21

Before K.P.K service Tribunal Peshawar

Khyber Pakhtukhwa
Service Tribunal

Diary No. 4804 Appeal No 6312 2021

Dated 9/4/2021

Muhammad Nawaz S/O Muhammad Aslam Junior Clerk Government
High School Bagh R/O Bagnoter Tehsil and District Abbottabad

vs

1. Secretary to Government Elementary and Secondary Education
KPK Peshawar.
2. Director Elementary and Secondary Education KPK Peshawar.
3. District Education Officer Abbottabad
4. Muhammad Ashfaq S/O Khanizaman Junior Clerk SDEO(F)
Office Abbottabad
5. Muhammad Bilal S/O Muhammad Afsar ^{J/c} SDEO(F) Office
Abbottabad
6. Siraj Din S/O Ghulam Yaseen ^{J/c Govet girls High school Kachi Pama Khan}
7. Afsar Ali S/O Syed Mir Jan ^{J/c Govet girls High school (free male) Banni}
8. Abdul Rashid S/O Zardool Khan ^{J/c Govet High school (male) Banni chattral}

Service Appeal under section 4 of KPK Service Tribunal Act 1974
against the promotion order No 931290-931370 dated 15-2-21 under
which the name of Appellant for promotion against the post of Senior
Clerk BPS-14 is deferred without any sufficient reason with Malafide,
and respondents No 4 to 8 were promoted who was junior to the
appellant.

Filed to-day
[Signature]
Registrar
09/04/2021

Prayer:

on acceptance of this appeal the respondents 2 and 3 may
grancaly be directed that of promotion granted to the
appellant from the date when his junior were promoted
i-e 15-2-21 with back benefits in the interest of Justice.

Re-submitted to-day
and filed.
[Signature]
Registrar
16/6/2021

Respectfully showeth:


1. That he appellant was appointed as Naib Messenger in the office of District Education office(F) primary Abbottabad vide office order no 2539-41 dated 14-5-91 in this respect copy of Service Book Page No 3 Annexed as Annexure "A".
2. That subsequently appellant was promoted from the post of Naib Messenger BPS-2 to against the vacant post of Junior Clerk BPS-5 vide order no 96-100 Dated 20-1-97 copy of order Annexed as Annexure "B".
3. That the name of Appellant is in Serial No 619 on Seniority list 2020 of Junior Clerk copy of Seniority list Annexed as Annexure "C".
4. That ht Respondents/ Department with Malafide against the Law, Rules and Seniority those Junior Clerk who were Junior then the appellant were promoted from the post of Junior Clerk BPS-11 to the post of Senior Clerk BPS-14 but the appellant was not granted promotion against the post of Senior Clerk without any sufficient reason and name of the appellant deferred for promotion copy of order is Annexed as Annexure "D".
5. That appellant submitted Department appeal against, illegal, unlawful, Discriminatory order, Acts and Action of the Respondents on 16-2-21 before Respondent No 4 through Respondent No 3 but up till now no response was given hence this appeal on the following grounds amongst others copy of

Departmental appeal is Annexure "E" and letter No. 1332 of Respondent NO 3 Annexure "F".

Grounds:

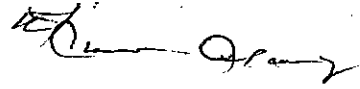
- A. That the order, Act, and Action of the Respondents for not grant of Promotion to appellant against the post of Senior Clerk without any sufficient reason is illegal, unlawful, Discriminatory which is not sustainable under the law and liable to be set aside.
- B. That Justice demand that the appellant is treated with fair play and promotion must be made in accordance with law and rules.
- C. That Act and Action of the Respondents Regarding not granting promotion to appellant is against Seniority Rules and against Article 4 and 25 of the constitution.
- D. That Respondent Deprive the appellant from his lawful ~~right~~ ^{therefor} of promotion appellant has irreparable loss.

It is therefore respectfully prayed that on acceptance of this appeal. Respondent may granularly be Directed for that of promotion granted to the appellant against the post of Senior Clerk from the Date when his Junior were promoted i-e 15-12-21 with all back benefits in the interest of Justice any other relief which this Honorable court may Deem fit proper may also be granted.



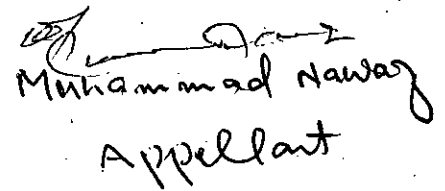
Muhammad Nawaz
Appellant through counsel
Sardar Muhammad Azeem
Advocate Abbottabad.

Dated: 08-04-2021



Verification:

Verified on oath that the contents of forgoing appeal are true and correct for the best of my knowledge and believe and nothing has been concealed for their in from the honorable court



Muhammad Nawaz
Appellant

The entries in this page should be re-attested at least every five years and the Signature to lines 9 and 10 should be dated.

'A'

5

1. Name: MR. MUHAMMAD NAWAZ

2. Race: KARLAL

3. Residence: Village and P.O. Bogroter
Tehsil and District Abbottabad

4. Father's name and residence: MUHAMMAD ASLAM

5. Date of birth by Christian era as nearly as can be ascertained: 16-04-1961
(16th April NH Sixty One)

6. Exact height by measurement: 1.11
5-7

7. Personal marks for Identification: NIL

8. Left hand thumb and Finger Impression of (Non-Gazetted) Officer.

Little Finger

Ring Finger

Middle Finger

Fore Finger

Thumb

9. Signature of Government Servant: [Signature]

10. Signature and Designation of the Head of the Office, or other Attesting Officer: District Education Officer (Female) Primary Abbottabad

Attested
Sardar Muhammad
Azam
Advocate Abbottabad

Attested
 Sardar Muhammad
 (Aged 45)
 Adv. Abbotabad

6

3 Promoted against the Post of D/Asst
 in the Office of the DEO(F) Primary Abd.

8 Signature of Government Servant	9 Signature and designation of the head office or other attesting officer in Form Nos 1 to 8	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting Officer	Nature and duration of leave taken	Allocation of period of leave of average pay to another Government Servant	
						Period	Government which debitabe
	M. W. ... DEO(F) Add.	Scale revised 31-5-91		M. W. ... DEO(F) Add. District Education Officer Female Primary Abbottabad			③ Promoted against the Post of D/Asst in the Office of the DEO(F) Primary Abd. vide this office order No. 2539-41 dated 14-05-1991. M. W. ... District Education Officer Female Primary Abbottabad
	M. W. ... DEO(F) Add.	30-11-91	Annual Increment	M. W. ... DEO(F) Add. District Education Officer Female Primary Abbottabad			Service verified from the Acq. Rolls and other office record wef 14-05-91 to 30-11-91. M. W. ... District Education Officer Female Primary Abbottabad
	M. W. ... DEO(F) Add.	30-11-92	do	M. W. ... DEO(F) Add. District Education Officer Female Primary Abbottabad			
	M. W. ... DEO(F) Add.	30-11-93	do	M. W. ... DEO(F) Add. District Education Officer Female Primary Abbottabad			
	M. W. ... DEO(F) Add.	31-5-94	Scale revised	M. W. ... DEO(F) Add. District Education Officer Female Primary Abbottabad			② Promoted against the Post of D/Asst in the Office of the DEO(F) Primary Abd. vide this office order Enclt. No. 5447-50 dated 06-10-1994. B Takover Charge p. 12-12-92. District Education Officer Female Primary Abbottabad
	M. W. ... DEO(F) Add.	30-11-94	Annual Increment	M. W. ... DEO(F) Add. District Education Officer Female Primary Abbottabad			Service verified from 1-12-92 to 30-11-94 from the acq: role & other office record M. W. ... District Education Officer Female Primary Abbottabad
	M. W. ... DEO(F) Add.	1-9-94	Promoted as D/Asst in BPS-2 (A)	M. W. ... DEO(F) Add. District Education Officer Female Primary Abbottabad			
	M. W. ... DEO(F) Add.	30-11-95	Increment	M. W. ... DEO(F) Add. District Education Officer Female Primary Abbottabad			Service verified from 1-12-92 to 30-11-95 from the acq: role & other office record M. W. ... District Education Officer Female Primary Abbottabad
	M. W. ... DEO(F) Add.	30-11-96	do	M. W. ... DEO(F) Add. District Education Officer Female Primary Abbottabad			Service verified from 1-12-92 to 30-11-96 from the acq: role & other office record M. W. ... District Education Officer Female Primary Abbottabad
	M. W. ... DEO(F) Add.	19-01-97	Promoted as D/Asst in BPS-5	M. W. ... DEO(F) Add. District Education Officer Female Primary Abbottabad			
	M. W. ... DEO(F) Add.	30-11-97	Annual Increment	M. W. ... DEO(F) Add. District Education Officer Female Primary Abbottabad			Service verified from 1-12-93 to 30-11-95 from the acq: role & other office record M. W. ... District Education Officer Female Primary Abbottabad
	M. W. ... DEO(F) Add.	30-11-98	do	M. W. ... DEO(F) Add. District Education Officer Female Primary Abbottabad			
	M. W. ... DEO(F) Add.	03-04-1999	Transfer to GHS, Bg.	M. W. ... DEO(F) Add. District Education Officer Female Primary Abbottabad			Service verified from the Acq. Rolls and other office records wef 1-12-95 to 30-11-96. M. W. ... District Education Officer Female Primary Abbottabad
	M. W. ... HEADMASTER H.S. Bg. Add.	30-11-99	Incr	M. W. ... DEO(F) Add. District Education Officer Female Primary Abbottabad			

(B)

7

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PRY:
ABBOTTABAD:

OFFICE ORDER NO _____ /
DATED A-ABAD THE _____ /19

ORDER

Mr, Muhammad Nawaz S/O Muhammad Aslam working against the post of Daftri in BPS;2 is hereby promoted against the vacant post of Junior Clerk in BPS;5 i.e. (1400-66-2390) in the interest of public service with immediate effect..

Note;- The promotion has been made as terms of S.No 9 column;5 of S&GAD's Notification No. _____ (S&GAD) 47//80 dated 21-12-1982 read with amendment vide Notification of even number dated 26-1-89.

2; Charge report should be submitted to all concerned.

Sell
DISTRICT EDUCATION OFFICER
(FEMALE) PRIMARY ABBOTTABAD.

Enst. No 96-100 /Dated/ Promotion/the Abbottabad 20/11 /1997

Copy submitted to the;-

- 1;- The Director Primary Education NWFP Peshwar for information please.
- 2;- District Account's Officer Abbottabad.
- 3;- Account Branch (Local Office).
- 4;- Office Order File.
- 5;- Mr, Muhammad Nawaz Daftri local office.

Y. Iqbal
DISTRICT EDUCATION OFFICE
(FEMALE) PRIMARY ABBOTTABAD.

Z.A.Qureshi/

Attested
Muhammad
Advocate
Abbottabad

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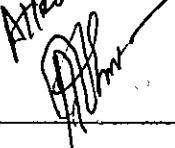
Annex (C)

Final Seniority List of J-Clerks/Store Keeper/ASK/ in and under Directorate E&SE, DCTE, Merged Districts & PITE Khyber Pakhtunkhwa

corrected 31-5-2020

S.#	Name	Father's Name	Design	Date of Birth	Date of 1st apptt in E&SE deptt	D-O Apptt as J.C. ASK, SK in E&SED	Present place
1	AHMAD KHAN	GUL MUHAMMAD	J/Clerk	15/03/1961	05/05/1979	05/05/1979	GHS RATTIA
2	Yousaf Shah	Midrarul Haq	J/Clerk	10/02/1968	21/10/1987	21/10/1981	GHS Qandahar
3	M/Zul Zareen	Muhammad Miskeen	J/Clerk	09/05/1964	24/12/1987	24/12/1981	GHS Karakoram
4	Iftikhar Ahmad	Haji Gul	J/Clerk	04/04/1961	06/11/1987	06/11/1982	GHS Kohat
5	Abdul Jameel	Abdul Bari	J/Clerk	08/09/1962	27/12/1987	27/12/1982	GHS Shangla
6	Arifullah	Siffatullah	J/Clerk	01/04/1961	07/11/1987	07/11/1985	GHS Bannu
7	Abdullah Khan	Muhammad Shah	J/Clerk	04/10/1968	09/01/1986	09/01/1986	GGHS Kohat
8	Abdur Rauf	Khoshab Din	J/Clerk	13/03/1962	04/09/1986	04/09/1986	GHS Bannu
9	Iran Badshah	Khiali Khan	J/Clerk	21/03/1969	23/10/1986	23/10/1986	DEO(M) Kohat
10	Amir Zada	Mohammad Hassan	J/Clerk	15/05/1964	22/11/1986	22/11/1986	GHS Lohar
11	Nazir Shah	Raheem Shah	J/Clerk	13/02/1967	06/12/1986	06/12/1986	GGHS Chitral
12	Alamzeb	Subhanuddin	J/Clerk	03/02/1966	10/12/1986	10/12/1986	GHS Tirmah
13	Saifur Rehman	Fazlur Rehman	J/Clerk	21/04/1962	05/03/1987	05/03/1987	GHS Umerkot
14	Mir Hussain	Faqir Hussain	J/Clerk	01/01/1967	08/03/1987	08/03/1987	GHS Mardan
15	Muhammad Sultan	Ali Khan	J/Clerk	02/02/1966	01/05/1987	01/05/1987	GHS Shangla
16	Waheedullah	Manak Khan	J/Clerk	25/11/1967	11/05/1987	11/05/1987	GHS Bannu
17	Iltaf Hussain	Nazir Hussain	J/Clerk	11/11/1968	21/05/1987	21/05/1987	GHS Orakzai
18	IRSHAD AHMED	MUFARIQ SHAH	J/Clerk	29/04/1968	05/09/1987	05/09/1987	GGHS Pesh
19	Ikram Ullah	Yaqeen Shah	J/Clerk	04/11/1969	01/10/1987	01/10/1987	GHS Nowshera
20	Matiullah	Habibullah	J/Clerk	11/02/1968	27/10/1987	27/10/1987	GHS FR Tank
21	Zahoor Hussain	Gulab Hussain	J/Clerk	01/07/1966	08/12/1987	08/12/1987	GHS Kurram
22	Fazal Subhan	Sarfaraz Khan	J/Clerk	20/09/1965	16/12/1987	16/12/1987	GHS Bannu
23	SHAH NAWAZ KHAN	HAJI DANISH	J/Clerk	25/01/1964	23/12/1987	23/12/1987	GGHS Pesh
24	Miranshah	Muhibullah	J/Clerk	09/05/1968	23/12/1987	23/12/1987	GHS FR Tank
25	Muhammad Ismail	Muhammad Qahar	J/Clerk	18/04/1968	14/04/1988	14/04/1988	DOU (M) Shangla
26	Khitab Gul	Sardar Khan	J/Clerk	18/02/1966	25/05/1988	25/05/1988	GHS NWA
27	MUHAMMAD IQBAL	KHAN SHER	J/Clerk	22/06/1968	10/08/1988	10/08/1988	GHS Pesh
28	Mumtaz Ali	Shamsul Qamar	J/Clerk	25/01/1965	16/09/1988	16/09/1988	GHS Swabi
29	ZAKI ULLAH	FAZAL/E/REH	ASK	20/10/1962	12/10/1988	12/10/1988	GHS Pesh
30	IRSHAD AHMED	FAQEER MUHAMMAD	J/Clerk	16/03/1968	24/11/1988	24/11/1988	GGHS Pesh
31	MUHAMMAD IBRAHIM	Malik HABEEB KHAN	J/Clerk	01/01/1967	26/11/1988	26/11/1988	GHS Pesh
32	Altaf Alam	Ghous/ud/Din	J/Clerk	15/08/1970	15/08/1989	15/08/1989	GHS SWA
33	SADDAQAT KHAN	AMRAT KHAN	J/Clerk	05/03/1969	28/08/1989	28/08/1989	GHS Pesh
34	Tanveer Mujeeb	Mehboob Alam	J/Clerk	17/05/1970	17/09/1989	17/09/1989	GHS Abbottabad
35	Amir Ullah Khan	Mohd Zar Ali Khan	J/Clerk	12/01/1972	22/09/1989	22/09/1989	GHS Bannu
36	Shahid Khan	Gulab Khan	J/Clerk	04/11/1969	01/10/1989	01/10/1989	GHS Dir Lower
37	Amjad Sohail	Mohammad Rafique	J/Clerk	08/03/1971	16/10/1989	16/10/1989	GHS FR Peshawar
38	Imtiaz Hussain	Ajab Khan	J/Clerk	15/02/1965	01/12/1989	01/12/1989	GHS Abbottabad
39	Muhammad Afzal	Umeer Khan	J/Clerk	15/03/1962	09/12/1989	09/12/1989	GHS Swat
40	MANZOOR ALAM	UMAR KHAN	J/Clerk	12/01/1968	10/01/1990	10/01/1990	GHS Pesh
41	sharifullah	Sher Ghazi Khan	J/Clerk	15/03/1966	18/04/1990	18/04/1990	GHS Chitral
42	Rahmat Illahi	Zindagani	J/Clerk	16/10/1963	19/04/1990	19/04/1990	GHS Chitral

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Attested


Best copy

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Seniority List of j-clerck /store keeper/ASK/ in and under Directorate E&SE, DCTE, Merged Tribel Districts & PITE khyber Pakhtankhawa.

Correctedy 31-05-2020



s #	Name	Father's Name	Design	Domicile	D.O.B	D.O 1st apptt in E & SE Deptt .	D.O Apptt as JC, ASK, SK, in E&	Present place of posting
1	AHMAD KHAN	GUK MUHAMMAD	J/CLERCK	DIK	15/03/1961	5/5/1979	5/5/1979	GHS RATTA KHLACHI DIK
2	YOUSAF SHAH	MIDRARUL HAQ	J/CLERCK	SWAT	10/2/1981	21/10/1981	21/10/1981	GHS QAMBAR
3	M/ ZUL ZAREEN	MUHAMMAD MISKEEN	J/CLERCK	ABBOTTBARD	9/5/1964	24/12/1981	24/12/1981	GHS KANTHIALI
4	IFTIKHAR AHMED	HAJI GUL	J/CLERCK	kohat	04/04/1661	6/11/1982	6/11/1982	GHS KOHAT
5	ABDUL JAMEEL	ABDUL BARI	J/CLERCK	SHANGLA	8/9/1962	7/11/1986	7/11/1986	GHS OLANER
6	ARIFULLAH	SIFFATULLAH	J/CLERCK	FR-BANNU	1/4/1961	7/11/1986	7/11/1986	GHS GANDERI KHATAK
7	ABDULLAH KHAN	MUHAMMD SHAH	J/CLERCK	KARAK	4/10/1968	9/1/1986	9/1/1986	GHS MUHAMMAD KHELFR BANNU
8	ABDUR RAUF	KHOSAB DIN	J/CLERCK	KOHAT	13/03/1962	4/9/1986	4/9/1986	GGHS KHOJAKI KILLA
9	IRAN BADSHAH	KJIALI KHAN	J/CLERCK	KARAK	21/03/1969	23/11/1986	23/11/1986	GHS BARK
10	MIR HUSSAIN	FAQIR HUSSAN	J/CLERCK	BAJOUR	15/05/1964	22/11/1986	22/11/1986	DEO(M) KARKA
11	NIZAR SHAH	RAHEEM SHAH	J/CLERCK	Haripur	13/02/1967	6/12/1986	6/12/1986	GHS Loi sam bajour agcy
12	ALAMZEB	SUBHANUDIAN	J/CLERCK	SWA	3/2/1966	10/12/1986	10/12/1986	GGHS ghazi Hamlet
13	SAIF UR REHMAN	FAZAL UR REHMAN	J/CLERCK	PESHAWAR	21/04/1962	5/3/1987	5/3/1987	GHS Tiaraz swa
14	MIR ZADA	FIQAR HUSSAIN	J/CLERCK	NOWSHERA	21/04/1967	8/3/1987	8/3/1987	GHS urmar Bala peshawar
15	MUHAMMAD SULTAN	ALI KHAN	J/CLERCK	KARAK	2/2/1966	1/5/1987	1/5/1987	GHS Manahi
16	WAHEED ULLAH	MANAK KHAN	J/CLERCK	FR BANNU	25/11/1967	11/5/1987	11/5/1987	GHS, ShahidanBanda
17	ILTAF HUSSAIN	NAZIR HUSSAIN	J/CLERCK	ORAKZI	11/11/1968	21/05/1987	21/05/1987	GHS saadullahFR, Bannu
18	IRSHAD AHMED	MUFARIQ SHAH	J/CLERCK	PESHAWAR	29/04/1968	5/9/1987	5/9/1987	GHS And Khel Bala
19	IKRAM ULLAH	YAQEEN SHAH	J/CLERCK	NOWSHERA	4/11/1969	1/10/1987	1/10/1987	GHS Gul Bahar
20	MATIULLAH	HABIBULLAH	J/CLERCK	FR TANK	11/2/1968	27/10/1987	27/10/1987	GHS, Aza khel Bala
21	Zahoor Hussain	Gulab Hussain	J/CLERCK	kurram	1/7/1966	8/12/1987	8/12/1987	GHS khirgai FR, Tank
22	FAZAL-SUBHAN	SARFARAZ KHAN	J/CLERCK	Bannu	20/09/1965	16/12/1987	16/12/1987	GHS Pir Tangi FR,Tank
23	SHAH NAWAZ KHAN	HAJI DANISH	J/CLERCK	PESHAWAR	25/01/1964	23/12/1987	23/12/1987	DDO (M) Primary Shangla
24	MIRANSHAH	MUhibULLAH	J/CLERCK	FR-Tank	9/5/1968	23/12/1987	23/12/1987	GHS Taj mohammad kot NWA
25	MUHAMMAD ISMAIL	MUHAMMAD QA HAR	J/CLERCK	SHANGLA	18/04/1968	14/04/1988	14/04/1988	GHS DAAG
26	KHITAB GUL	SARDAR KHAN	J/CLERCK	NWA	18/02/1966	25/05/1988	25/05/1988	GHS Taraki
27	MUHAMMAD IQBAL	KHAN SHER	J/CLERCK		22/06/1968	10/8/1988	10/8/1988	GTSS Ghilbahar
28	MUMTAZ ALI	SHAMSUL QAMAR	J/CLERCK	swabi	25/01/1965	16/09/1988	16/09/1988	GGHS ShaikhAbad
29	ZAKI ULLAH	FAZAL UR REHMAN	ASK	PESHAWAR	20/10/1962	12/10/1988	12/10/1988	GHS Chamnaki
30	IRSHAD AHMED	FAQEER Muhammad	J/CLERCK	PESHAWAR	16/03/1968	24/11/1988	24/11/1988	GHS Nano SWA
31	muhammad ibrahim	Malik Habeeb khan	J/CLERCK	PESHAWAR	1/1/1967	26/11/1988	26/11/1988	GHS Chamnaki
32	altaf Alam	Ghos ud Din	J/CLERCK	SWA	15/08/1970	15/08/1988	15/08/1988	GHS Nano SWA
33	Saddaqaat Khan	Amrat Khan	J/CLERCK	PESHAWAR	5/3/1969	28/08/1988	28/08/1988	GGHS Chamkani
34	Tanveer Mujeeb	Mehboob khan	J/CLERCK	ABBOTTBARD	17/05/1970	17/09/1989	17/09/1989	GHS nareela
35	Amir ullah Khan	Mohd Zar Ali Khan	J/CLERCK	Bannu	12/1/1972	22/09/1989	22/09/1989	GGCMHS Timergara
36	Amjad Sohail	Mohammad Rafique	J/CLERCK	FR Peshwar	8/3/1971	16/10/1989	16/10/1989	GHS Faridi FR.Peshawar
37	Imtiaz Hussain	Ajab Khan	J/CLERCK	ABBOTTBARD	15/02/1965	1/12/1989	1/12/1989	GHS Moclia
38	Muhammad Afzal	umeer Khan	J/CLERCK	SWAT	15/03/1962	9/12/1989	9/12/1989	GHS fatahpur
39	Manzoor Alam	Umar Khan	J/CLERCK	PESHAWAR	1-Dec	10/1/1990	10/1/1990	GHS Beri Bagh
40	Sharifullah	Sher Ghazi Khan	J/CLERCK	chitral	15/03/1966	18/04/1990	18/04/1990	GHS KHEO Khei PACA
41	Rahmat illahii	Zindagani	J/CLERCK	chitral	16/10/1963	19/04/1990	19/04/1990	GHS. Shahgram

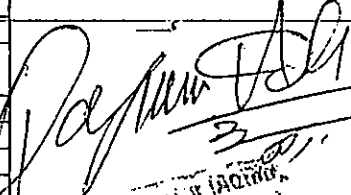
Attested
Mujeeb
Sardar Muhammad Azeem
Advocate Abbottabad

581	Muhammad Snaheel		J/Clerk	Haripur	(9)	01/07/1997	01/07/1997	SDO (I) Haripur
582	Muhammad Nouman		J/Clerk	Battal		09/01/1991	01/07/1997	GHS Thakot
583	Iltafull Haq	Asmatullah	J/Clerk	Chitral		04/04/1973	02/07/1997	Long Leave
584	AZIZ UR RAHIM	MOHAMMAD NAEEM	J/Clerk	Pesh		04/01/1974	03/07/1997	GHS Irrigation
585	Fayaz Khan	Feroz Khan	J/Clerk	Charsadda		20/05/1976	03/07/1997	GSMSHS No 1 tangi charsadda
586	Ghulam Murtaza	GHULAM SABIR	J/Clerk	Pesh		12/10/1974	04/07/1997	GHS Larana
587	Mubashir Hassan	Saifur Rahma	J/Clerk	Swabi		27/06/1974	07/07/1997	GHS Sarai
588	Abdullah	Muhammad Raza	J/Clerk	Kohat		02/02/1975	09/07/1997	GHSS Shakardarra
589	Asad Shah zada	Khan Badshah	J/Clerk	Kohat		05/09/1976	09/07/1997	GHSS Lachi
590	BASHIR AHMAD JAN	SABIR KHAN	J/Clerk	Pesh		05/01/1966	21/07/1997	GHSS/NO1 CITY
591	Ziarat Shah J/C	Rahim Shah	J/Clerk	Mardan		07/01/1975	25/07/1997	GHS Sharqi Hoti
592	Muhammad Naeem	Muhammad Iqbal	J/Clerk	Mansehra		01/04/1972	30/07/1997	GHS Dadar
593	Mohammad Sajid	Mohammad Aslam	J/Clerk	Haripur		10/01/1973	01/08/1997	GGHS Sarai Saleh Haripur
594	AJMAL HUSSAIN	BADSHAH ZADA	J/Clerk	MALAKAND		14/02/1967	21/08/1997	Malakand
595	Zawar Ali J/C	Haji Ikram Ullah	J/Clerk	Mardan		22/04/1977	25/08/1997	GGHS Labour Colony
596	Fazal Hakeem	Israr ud Din	J/Clerk	Nowshera		20/02/1973	28/08/1997	GGHS,NO2 NSR Kalan
597	Mohammad Ahsan Shah	Muharram Shah	J/Clerk	Haripur		01/03/1972	30/08/1997	GHSS Sirikote Haripur
598	Abdul Latif	Abdul Ghaffar	J/Clerk	Swat		19/08/1973	30/08/1997	GGHS SHAHEEN ABAD SWAT
599	Sajid Mehmood	Mohammad Akbar	J/Clerk	Haripur		17/02/1973	01/09/1997	O/O DEO (Male) Haripur
600	Muhammad Imran	Muhammad Sadiq	J/Clerk	Mansehra		03/06/1977	01/09/1997	GGHS Mangloor
601	ASGHAR ALI	MUHAMMAD NAWAZ	J/Clerk	Pesh		01/03/1974	29/09/1997	DEO MALE PESH
602	Ajmal Khan	Bahder Sher	J/Clerk	Charsadda		01/10/1974	29/10/1997	GHS Haleem Zai
603	Muhammad Nawaz	Muhammad Aslam	J/Clerk	Abbottabad		16/04/1961	14/05/1991	GHS Bagh
604	Muhammad Farooq	Alam Sher	J/Clerk	D/I/K		19/12/1969	28/02/1993	GGHS Bihari Colony
605	Mumtaz Ali Khan	Hazrat Ghulam	J/Clerk	Swabi		05/01/1977	01/07/1994	GGHS Saleem Khan
606	Siraj Din	Ghulam Yaseen	J/Clerk	D/I/K		03/03/1970	01/01/1998	GGHS Kachi Paind Khan
607	Afsar Ali	Syed Mir Jan	J/Clerk	Bannu		20/11/1974	01/01/1998	Bannu
608	Asmatullah	Khan Syed Shah	J/Clerk	Bannu		10/07/1968	04/01/1998	Bannu
609	Abdul Jalil Shah	Mehboob Shah	J/Clerk	Bannu		01/01/1967	05/01/1998	Class Iv Quota
610	Anwar Hussain	Muht: Nazif	J/Clerk	Bannu		25/05/1970	05/01/1998	Class Iv Quota
611	Shah Jehan	Shamshad	J/Clerk	Swabi		01/01/1974	08/01/1998	GGHS Sarwar Shah Kothay
612	Qismat Ali Khan	Faizullah Khan	J/Clerk	Bannu		06/03/1971	12/01/1998	Class Iv Quota
613	Noorul Amin	Mohammad Nasim	J/Clerk	Chitral		13/03/1970	15/01/1998	GGCMHS (G) Denin
614	IHSAN MUHAMMAD	WALI MUHAMMAD	J/Clerk	MALAKAND		20/03/1972	16/01/1998	Malakand
615	ZILA DAR KHAN	AKBAR ALI	J/Clerk	LAKKI		10.08.73	16/01/1998	GGHS Nasar Khel
616	FAZAL NAEEM	MUHAMMAD SALEEM	J/Clerk	MALAKAND		10/04/1970	17/01/1998	Malakand
617	Taj Wali	Shamsur Rehman	J/Clerk	Nowshera		06/02/1973	17/01/1998	GHSS, Khalrabad
618	Riza Ali	Purdoom Wali	J/Clerk	Chitral		16/03/1974	19/01/1998	GHS: Sonoghur
619	Muhammad Ashfaq	Khani Zaman	J/Clerk	Abbottabad		09/08/1975	19/01/1998	SDEO (F) Office A/Abad
620	Abdur Rashid	Zardool Khan	J/Clerk	Chitral		23/02/1975	20/01/1998	GHS: Booni
621	Sahib Wali Khan	Aman Khan	J/Clerk	Chitral		04/01/1968	26/03/1995	GHS: Chulni
622	Israr Ahmad	Fazal Ahad	J/Clerk	Nowshera		13/12/1975	21/01/1998	GHSS, Kkhesghi Payan
623	Shakeel Abbas	Manzoor Hussain Shah	J/Clerk	D/I/K		04/12/1969	01/11/1990	SDEO(F) Prova
624	Muhammad Bilal	Muhammad Afsar	J/Clerk	Abbottabad		06/07/1978	22/01/1998	SDEO (F) Office A/Abad
625	Nisar Muhammad Arif	Nazar Muhammad	J/Clerk	DIK		01/04/1973	24/01/1998	GHSS No 3 DIKhan
626	Ihsanullah	Hazrat Younas	J/Clerk	Shangla		15/04/1975	24/01/1998	GHS Sandovi
627	Abdul Khaliq	Abdul Malik	J/Clerk	Swat		13/03/1974	24/01/1998	GHS Sutor
628	Ghulam Ahad	Shah Nabaz	J/Clerk	Swat		12/05/1971	25/01/1998	GGHS SHAHDARA SWAT
629	Farman Ali	Siraj	J/Clerk	Swat		10/04/1973	25/01/1998	GHSS BARIKOT
630	Muhammad Zia Ur Rahman	Abdul Qayyum	J/Clerk	DIK		23/02/1978	28/01/1998	GHSS MURYALI
631	Abdus Samad J/C	Jan Mohammad	J/Clerk	Mardan		01/02/1973	31/01/1998	GGHS Bagu Banda
632	Riaz Khan J/C	Khail Uddin	J/Clerk	Mardan		02/10/1971	01/01/1988	GHS Gaddar
633	Mohammad Diyar J/C	Abdul Hakeem	J/Clerk	Mardan		10/05/1970	01/04/1990	GHSS T Bhai
634	Mudasar Shah	Muzammil Shah	J/Clerk	Haripur		23/02/1974	01/02/1998	GHS Bail Haripur


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 Abbottabad

791	Aftab Alam	Mustaqeem Khan	J/Clerk	FATA	10/04/1980	01/09/2003	01/09/2003	GHS Ahmad Wam SWA
792	Ibrar Hussain	Noor Mohamrad	J/Clerk	FATA	03/02/1981	01/09/2003	01/09/2003	GHS Makrai Kurram Agency
793	Mukamil Khan	Ismail	J/Clerk	FATA	02/02/1982	01/09/2003	01/09/2003	GHS Qamar Dir Kor M Agency
794	Shah Mohammad	Miradam Khan	J/Clerk	FATA	20/09/1982	01/09/2003	01/09/2003	GHSS Spulga NWA
795	Asfand Yar	Sangtiaz Khan	J/Clerk	FATA	12/03/1983	01/09/2003	01/09/2003	GHSS Nadir Badin Khel FR, Bannu
796	Ikramullah	Zahidullah	J/Clerk	FATA	11/11/1989	01/09/2003	01/09/2003	GHS Chappari FR, Bannu
797	Wahid Ullah	Dawlat Khan	J/Clerk	Mohmand Age	07/03/1983	28/08/2003	25/09/2003	GGHS Imdad Ullah M. Agency
798	Asghar gul	hayat gul	J/Clerk	FATA	06/02/1973	02/10/2003	02/10/2003	FATA
799	Ibrahim Khan	Ziarat Gul	J/Clerk	Peshawar	15/06/1981	02/10/2003	02/10/2003	DE (FATA) Peshawar
800	Fathullah	Abdul Baqi	J/Clerk	Dir (U)	14/09/1978	01/01/2004	01/01/2004	Dir (U)
801	Said Lawar Shah	Azhar Shah	J/Clerk	BUNER	17/01/1969	17/01/1987	04/01/2004	DDO (F) Office
802	Khan Zaman	Said Zamin Khan	J/Clerk	Dir (U)	03/05/1970	04/01/2004	04/01/2004	Dir (U)
803	Mohammad Ilyas	Mohammad Shuaib	J/Clerk	Dir (U)	01/11/1973	06/01/2004	06/01/2004	Dir (U)
804	Mohammad Ismail	Gul Hassan	J/Clerk	Dir (U)	28/02/1978	06/01/2004	06/01/2004	Dir (U)
805	Seyahud Din	Miftahud Din	J/Clerk	Dir (U)	01/04/1978	06/01/2004	06/01/2004	Dir (U)
806	Mehbood Ali Shah	Said Fairoz Shah	J/Clerk	Dir Lower	18/02/1974	12/03/2004	12/03/2004	GHSS Saddo
807	Azhar Saeed	Noorul Huda	J/Clerk	BUNER	11/03/1981	26/03/2004	26/03/2004	DEO Office
808	Abdus Salam	Khybary	J/Clerk	BUNER	10/10/1967	21/04/1991	27/03/2004	GHSS Ghadizai
809	Mushtaq	Gul Rahim Khan	J/Clerk	BUNER	01/03/1979	26/03/2004	27/03/2004	GGHS Shaibandai
810	Sher Zada	Afsar Khan	J/Clerk	BUNER	15/02/1973	01/04/1991	01/04/2004	O/O EDO
811	Said Muhammad Khan	Faqeer	J/Clerk	Dir Lower	20/10/1981	01/04/2004	01/04/2004	GHS Asbanr
812	SHER ALI KHAN	AZIM KHAN	J/Clerk	LAKKI	01/09/1972	01/05/2004	01/05/2004	GHS GHAZNI KHEL
813	Sher Ayaz	Amir Daraz	J/Clerk	Bannu	01/01/1970	10/05/2004	10/05/2004	Bannu
814	Muhammad Ashraf	Mian Muhammad Ikram Jan	J/Clerk	Shangla	01/04/1968	11/07/1996	11/07/1996	GGHS Alpural
815	Bakhtwar Khan	Dilbar	J/Clerk	Shangla	30/04/1967	01/10/1987	20/05/2004	DEO (M) Shangla
816	Abdul Qadoos	Umbers	J/Clerk	Shangla	27/06/1971	31/08/1997	20/05/2004	GHSS Olandar
817	Himayat/Ullah	Gul Parvez	J/Clerk	Shangla	05/04/1980	27/11/1998	20/05/2004	DDO(M) Alpural
818	Ikramullah Haq	Muhammad Faraz	J/Clerk	Shangla	16/08/1977	20/05/2004	20/05/2004	GHSS Shahpur
819	Gawhar Iqbal	Talat Iqbal	J/Clerk	Shangla	03/04/1979	20/05/2004	20/05/2004	O/O EDO Shangla
820	Tariq Shah	Afraseyab	J/Clerk	Shangla	04/11/1979	20/05/2004	20/05/2004	GHS Chakisar
821	Abdul Salam	Muhammad Younas	J/Clerk	Shangla	04/01/1981	20/05/2004	20/05/2004	O/O EDO Shangla
822	Zahoorullah	Kharur Rahman	J/Clerk	Shangla	01/03/1983	20/05/2004	20/05/2004	GHS Titwala
823	Muhammad Hassan	Gul Saqiq	J/Clerk	Shangla	20/06/1977	22/05/2004	22/05/2004	GHS Ranyal
824	SAEED AKHTER	GUL AKHTER	J/Clerk	LAKKI	20/08/1976	31/05/2004	31/05/2004	E.D.O OFFICE LAKKI
825	Rafiq Hayat	Mohammad Qadir	J/Clerk	Swabi	13/03/1968	04/12/1989	01/06/2004	GHS Swabi
826	Muhammad Hamayun	Khyaud Din	J/Clerk	Charsadda	16/02/1975	18/09/1995	01/09/2004	GHS, Aba Zai
827	Waqar Ahmad	Muhammad Khan	J/Clerk	Shangla	01/05/1970	06/09/2004	06/09/2004	GHS Dnakol
828	Amjad Ali	Sardar Ali	J/Clerk	Buner	01/09/1979	07/09/2004	07/09/2004	GHSS Totali
829	Mohammad Yasir	Khan Zaman	J/Clerk	Kohistan	03/06/1974	18/09/2004	18/09/2004	O/O SDEO (M) Koistan/
830	Shah Jahan	Khan Mohammad	J/Clerk	Kohistan	04/05/1978	18/09/2004	18/09/2004	GHS Swarsteel
831	Mohammad Javaid	Mohammad Ibrahim	J/Clerk	Kohistan	04/01/1981	18/09/2004	18/09/2004	GHS KK Ranolia/
832	Bahadar Khan	Mohabat Khan	J/Clerk	Kohistan	01/03/1981	18/09/2004	18/09/2004	O/O SDEO (F) Kohisan/
833	Amjad Khan	Mohammad Qadeer/	J/Clerk	Kohistan	02/01/1985	18/09/2004	18/09/2004	O/O SDEO (M) Koistan/
834	Ihsanul Haq	Gul Zareen	J/Clerk	Kohistan	01/05/1985	18/09/2004	18/09/2004	O/O DEO (F) Kohistan/
835	WALI ULLAH	INAYAT ULLAH KHAN	J/Clerk	LAKKI	13/03/1979	23/09/2004	23/09/2004	GHSS DARA PEZU
836	Javed Iqbal/	Farosh Khan	J/Clerk	Battagram	05/03/1976	12/10/2004	12/10/2004	D/O/E&SE
837	Taj Ud Din	Abdul Qayum	J/Clerk	Battagram	15/03/1977	12/10/2004	12/10/2004	D/O/E&SE
838	Amjad Ali	Nosherwan Khan	J/Clerk	Battagram	03/02/1978	12/10/2004	12/10/2004	D/O/E&SE
839	Shair Muhammad	Shair Bahadar	J/Clerk	Battagram	01/10/1978	12/10/2004	12/10/2004	GHS:Thakot
840	Amir Muhammad	Abdul Hakim	J/Clerk	Battagram	01/01/1981	12/10/2004	12/10/2004	SDEO (M) BTM



Superintendent
 District Education Officer (M)
 Abbottabad-22100


Assistant Director (M)
 District Education Officer (M)
 Abbottabad-22100



Annexure (D)

NOTIFICATION

Consequent upon the recommendation of Departmental Promotion Committee (DPC) in its meeting held on 17-09-2020. The following Junior Clerks (B-11) working in and under the Directorate of E&SE/ DC&TE/ PIIE/ NMTD are hereby promoted to the post of Senior Clerk (B-14) on regular basis and posted/ adjusted /shuffled against vacant post of Senior Clerk (B-14) in the Office/Institutions as noted against each in the interest of public service with effect from the charge assumption of the newly promoted Assistants:-

Ser No	Name	Father's Name	Present station	Proposed	Remarks
1	M/Zul Zareen	Muhammad Miskeen	GHS Kantlali Abbottabad	DCTE Abbottabad	A.V.P
2	Abdul Jameel	Abdul Bari	GHSS Olandar Shangla	DEO Female Shangla	A.V.P
3	Abdullah Khan	Muhammad Shah	SDEO (F) Takhti Nasrati Karak	SDEO (F) Takhti Nasrati Karak	A.V.P
4	Alamzeb	Subhanuddin	GHS Azam Warsak SWTD	Service placed at the disposal of DEO SWTD for further adjustment.	
5	Irshad Ahmed	Mufariq Shah	GGHS Gulbahar Peshawar	GGHS Gulbahar Peshawar	A.V.P
6	Matiullah	Habibullah	GHS Khecha sub Div Jandola Tank	DEO Female Tank	A.V.P
7	Shah Nawaz Khan	Haji Danish	GGHSS Civil Colony Peshawar	Directorate NMD Peshawar	A.V.P
8	Miranshah	Muhibullah	GHS Pir Tangi Sub Div: Jandela Tank	DEO Female Tank	A.V.P
9	Muhammad Ismail	Muhammad Qahar	GHSS Shapur Shangla	GHSS Shapur Shangla	A.V.P
10	Mumtaz Ali	Shamsul Qamar	GHS Asota Sharif Swabi	DEO (F) Swabi	A.V.P
11	Amir Ullah Khan	Muhammad Zar Ali Khan	GHS Sedghi Many Khan SDW Bannu	GHSS Domel Bannu	A.V.P
12	Sher Ali Khan	Gulab Shah	GGHS Thral Dir Lower	SDEO Female Samar Bagh Dir Lower	A.V.P
13	Sharifullah	Sher Ghazi Khan	GHS Shagram Chitral Upper	GHSS Shagram Chitral Upper	A.V.P
14	Rehmat Illahi	Zindagani	GGHS Mustuj Chitral Upper	Service placed at the disposal of DEO (F) Upper chitral for further adjustment	A.V.P
15	Hassan Gul	Zarin Gul	GHSS Mall Khel Bala Nowshera	GHSS Mall Khel Bala Nowshera	A.V.P
16	Noor Zali Khan	Nazr Ali Khan	GGHS Bazar Ahmad Khan Bannu	GGHSS No.2 Bannu	A.V.P
17	Fazal Rehman	Jabbar Khan	DEO Male Kohat	GHSS Muslim Abad Kohat	A.V.P
18	Bulbul Aziz	All Rahmat	GGHS Booni Chitral Upper	DEO Female Upper Chitral at Booni	A.V.P
19	Aman Ullah	Faiz Muhammad	GHS Potah DIK	GHSS No.2 DIKhan	A.V.P

Sardar Muhammad Azeem

Attested
Sardar Muhammad Azeem
Advocate Abbottabad

Best Copy (D), (11-A)

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHBK PAKHTUNKHWA PESHAWAR.

Phone: 091-9225344

Email: ddadmn.es@gmail.com

NOTIFICATION

Consequent upon the recommendation of Departmental promotion Committee (DPC) in its meeting hold on 17-09-2020. The following Junior clerks (B-11) working in and under the Directorate of E&SE/ DC&TE/ PITE/ NMTD are hereby promoted to the post of Senior Clerk (B-14) on regular basis and posted/ adjusted/ shuffled against vacant post of Senior Clerk (B-14) in the Offices/institution as noted against each in the interest of public service with effect from the charge assumption of the newly promoted Assistants:-

Ser No	Name	Father Name	Present station	Proposed	Remarks
1.	M/Zul Zareen	Muhammad Miskeen	GHS Kantiali Abbottabad	DCTE Abbottabad	A.V.P
2.	Abdul Jameel	Abdul Bari	GHSS Olandar Shangla	DEO Female Shangla	A.V.P
3.	Abdullah Khan	Muhammad Shah	SDEO (F) Takhti Nasrati Karak	SDEO (F) Takhti Nasrati Karak	A.V.P
4.	Alamzeb	Subhanuddin	GHS Azam Warsak SWTD	Service placed at the disposal of DEO SWTD for further adjustment.	A.V.P
5.	Irshad Ahmed	Mufariq Shah	GGHS Gulbahar Peshawar	GGHS Gulbahar Peshawar	A.V.P
6.	Matiullah	Habibullah	GHS Khecha sub Div Jandola Tank	DEO Female Tank	A.V.P
7.	Shah Nawaz Khan	Haji Danish	GGHS Civil Colony Peshawar	Directorate NMD Peshawar	A.V.P
8.	Miranshah	Muhibullah	GHS Pir Tangi Sub Div Jandela Tank	DEO Female Tank	A.V.P
9.	Muhammad Ismail	Muhammad Qahar	GHSS Shapur Shangla	GHSS Shahpur Shangla	A.V.P
10.	Mumtaz Ali	Shamsul Qamar	GHS Asota Sharif Swabi	DEO (F) Swabi	A.V.P
11.	Amir Ullah Khan	Muhammad Zar Ali Khan	GHS Sedghi Many Khan SDW Bannu	GHSS Domel Bannu	A.V.P
12.	Sher Ali Khan	Gulab Shah	GGHS Thrai Dir Lower	SDEO Female Samar Bagh Dir Lower	A.V.P
13.	Sharifullah	Sher Ghazi Khan	GHS Shagram Chitral Upper	GHSS Shagram Chitral Upper	A.V.P
14.	Rehmat Illahi	Zindagani	GGHS Mustuj Chitral Upper	Service placed at the disposal of DEO (F) Upper Chitral for further adjustment	A.V.P
15.	Hassan Gul	Zarin Gul	GGHS Mali Khel Bala Nowshera	GHSS Shagram Chitral Upper	A.V.P
16.	Noor Zali Khan	Nazar Ali Khan	GGHS Bazar Ahmad Khan Bannu	GHSS No. 2 Bannu	A.V.P
17.	Fazal Rehman	Jabbar Khan	DEO Male Kohat	GHSS Muslim Abad Kohat	A.V.P
18.	Bulbul Aziz	Ali Rahmat	GGHS Booni Chitral Upper	DEO Female Upper Chitral at Booni	A.V.P
19.	Aman Ullah	Faiz Muhammad	GHS Potah DIK	GHSS No. 2 DI Khan	A.V.P

Sardar Muhammad Azeem
Sardar Muhammad
Azeem
Advocate Abbottabad

428.	Ajmal Hussain	Badshah Zada	SDEO F Batkhela Malakand	GGHSS Totakan Malakand	A.V.P
429.	Zawar Ali	Haji Ikram Ullah	GGHS Labour Colony Mardan	GGHSS Sokai Mardan	A.V.P
430.	Fazal Hakeem	Israr ud Din	GGHSS Nowshera Kalan	GGHSS No.1 Nowshera Cantt	A.V.P
431	Mohammad Ahsan Shah	Muharram Shah	GHSS Dheri Nakarchian Haripur	GHSS Jhamra Haripur	A.V.P
432.	Abdul Latif	Abdul Ghaffar	SDEO (F) Babuzai Swat	SDEO (F) Babuzai Swat	A.V.P
433.	Sajid Mehmood	Mohammad Akbar	O/O SDEO (Male) Haripur	SDEO (Male) Haripur	A.V.P
434.	Muhammad Imran	Muhammad Sadiq	GGHS Mangloor Mansehra	GGHSS Danda Khollan Mansehra	A.V.P
435.	Asghar Ali	Muhammad Nawaz	GGHS Islmia collegiate Peshawar.	Directorate NMD	A.V.P
436.	Ajmal Khan	Bahder Sher	GGHSS Shabqadar Fort Charsadda	SDEO (M) Samar Bagh Dir Lower	A.V.P
437.	Muhammad Farooq	Alam Sher	GGHSS Behari Colony DIK	GGHSS Metha pur DIKhan	A.V.P
438.	Mumtaz Ali Khan	Hazrat Ghulam	GHS Maneri Bala Swabi	GHSS salee Khan Swabi	A.V.P
439.	Siraj Din	Ghulam Yaseen	GGHS Hassa DI Khan	SDEO (F) Prova DI Khan	A.V.P
440.	Afsar Ali	Syed Mir Jan	DEO Female Bannu	GHS No.2 Bannu	A.V.P
441.	Shah Jehan	Shamshad	GGHS Sarwar Shah Kothey Swabi	GGCMHS Swabi	A.V.P
442.	Noorul Amin	Mohammad Nasim	GGHS Ayun Chitral	Services placed at the disposal of DEO Female Chitral Lower for further adjustment	
443.	Ihsan Muhammad	Wali Muhammad	SDEO (F) Dargai Mkd	GGHSS Khar Malakand	A.V.P
444.	Zila Dar Khan	Akbar Ali	GGHS Nasar Khel Lakkī	GHSS landiwa Lakkī Marwai	A.V.P
445.	Riza Ali	Purdoom Wali	GHS Chunj Chitral Upper	GHSS Baang Chitral	A.V.P
446.	Muhammad Ashfaq	Khani Zaman	GGHSS Comprehensive Abbottabad	GGHSS Kakul A/Abad	A.V.P
447.	Abdur Rashid	Zardool Khan	GHSS: Mastuj Chitral	GHSS: Mastuj Chitral	A.V.P
448.	Sahib Wali Khan	Aman Khan	GHS, Sonogur Chitral	SDEO (F) Mastuj Chitral upper	A.V.P
449.	Shakeel Abbas	Manzoor Hussain Shah	GGHS Daraband khurd DI Khan	GHSS Shorekot DI Khan	A.V.P
450.	Muhammad Bilal	Muhammad Afsar	GGHSS Comprehensive Abbottabad	GHSS Niamat Khan Haripur	A.V.P
451.	Nisar Muhammad Arif	Nazar Muhammad	GHSS No.3 DI Khan	GHSS Keri Shamozaī DIKhan	A.V.P
452.	Ihsanullah	Hazrat Younas	GHS Puran Shāngla	GGHSS Aloch Shāngla	A.V.P
453.	Abdul Khaliq	Abdul Malik	GHSS Utror SWAT	GHSS Utror Swat	A.V.P

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Sardar Muhammad Azeem
Advocate Abbottabad


931290-931370

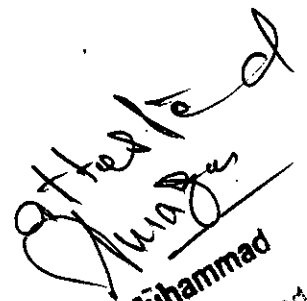
(13)

Post No. _____ / A-23/MS/Promotion JC to SC/ 2020. Dated Peshawar the 15/2/2020

Copy of the above is forwarded for the information and necessary to the:-

1. Account General, Khyber Pakhtunkhwa Peshawar.
2. Director Curriculum & Teaching Education, Khyber Pakhtunkhwa, Abbottabad.
3. Additional Director of Education (Newly Merged Tribal Districts) Peshawar.
4. Director PITE Khyber Pakhtunkhwa, Peshawar.
5. District Education Officers (Male & Female) concerned.
6. District Account Officers concerned.
7. Principals/ Headmasters/Headmistresses concerned.
8. Sub: Division Education Officers (Male & Female) concerned.
9. Officials concerned.
10. PA to Director E&SE Khyber Pakhtunkhwa, Peshawar.
11. Master File.


Assistant Director (Ad
E&SE Khyber Pakhtunkhwa, P


Sardar Muhammad
Azeem
Advocate Abbottabad

بخدمت جناب سیکرٹری ایلمینٹری اینڈ سیکنڈری ایجوکیشن خیبر پختونخوا، پشاور۔

عنوان: حکمانہ اپیل برخلاف پروموشن آرڈر (جونیئر کلرک سے سینئر کلرک) نمبری 931290-931370

مورخہ 15/02/2021 جاری کردہ ڈائریکٹر E&S ایجوکیشن خیبر پختونخوا، پشاور۔

جناب عالی! موجهات اپیل ذیل ہیں:-

1- یہ کہ سائل کی تقرری محکمہ تعلیم ضلع ایبٹ آباد میں مورخہ 14/05/1991 کو بطور کلاس-IV ہوئی اور بعد ازاں مورخہ 20/01/1997 کو سائل کی تقرری بحیثیت جونیئر کلرک گریڈ-V میں کر دی گئی۔

2- یہ کہ مورخہ 20/05/2014 کو حکومت KPK نے جونیئر کلرک کا بنیادی سکیل 11 مقرر کر دیا اور یوں سائل کی ایڈجسٹمنٹ سکیل نمبر 11 میں کر دی گئی۔

3- یہ کہ مورخہ 15/02/2021 کو بحوالہ آرڈر نمبر 931290-931370 ڈائریکٹر E&S نے جونیئر کلرک سے سینئر کلرک کی ترقی کا آرڈر جاری کیا اور سائل کا نام پروموشن آرڈر میں شامل نہیں کیا اور سائل سے کئی بہت جونیئر کلرک بطور سینئر کلرک پروموت کر دیئے گئے۔

4- یہ کہ سائل نے بروقت پروموشن کیلئے اپنے جملہ کاغذات جمع کروائے۔ اگر سائل کے کاغذات پر کسی قسم کی Deficiency موجود تھی تو سائل کو تحریری طور پر مطلع کیا جانا چاہیے تھا مگر سائل کو اس بابت کوئی آرڈر/لیٹر موصول نہیں ہوا۔

5- یہ کہ سائل کے خلاف کوئی Major یا Minor پینلٹی موجود نہ تھی کہ سائل کو ترقی سے محروم کیا جاتا۔

6- یہ کہ E&D رولز 2011 کی سیکشن 4-A کے تحت کوئی ایسا آرڈر موجود نہیں تھا کہ سائل کی ترقی کو روکا گیا ہو۔

7- یہ کہ سائل کو اس کے حق کوئی حق سے محروم کرنا غیر انصافی ہے۔ جس سے سائل کو تاحیات مالی نقصان پہنچنے کا اندیشہ ہے۔ اور محروم کرنا غیر انصافی ہے۔

8- یہ کہ سائل ترقی کیلئے تمام قواعد و ضوابط پورے کرتا ہے۔

لہذا استدعا ہے کہ سائل کو جونیئر کلرک سے سینئر کلرک کی پوسٹ پر جملہ بتایا جات سمیت ترقی دیے جانے کے احکامات صادر فرمائے جائیں۔ اور جس وقت تک اپیل ہذا کا فیصلہ نہیں ہوتا اس وقت تک مذکورہ ترقی آرڈر کو معطل فرمایا جاوے۔

نیز ایک غیر جانبدار انکوائری مقرر فرمائی جائے جس سے ان تمام تر افراد کے خلاف کارروائی کی جائے جنہوں نے سائل کو ترقی کے حق سے محروم کیا۔

المرقوم: 16/02/2021

العارض:

محمد نواز (جونیئر کلرک) گورنمنٹ ہائی سکول باغ، ضلع ایبٹ آباد۔

رابطہ نمبر: 0343-1961269

Attest
Sardar Muhammad
Aovul

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OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ABBOTTABAD



No. 1342 /Letter/Director/

Dated: 24/02/2021

☎ 0992-9310102, 0992-330131

✉ EDO.Education.Atd@gmail.com

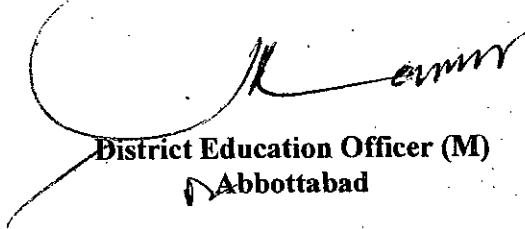
The Director,
Elementary and Secondary Education,
Khyber Pakhtunkhwa Peshawar.

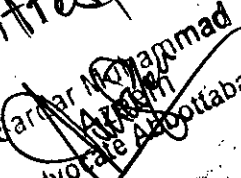
Subject: APPEAL AGAINST PROMOTION ORDER OF JUNIOR TO SENIOR CLERK ISSUED UNDER ENDST.NO.931290-931370 DATED 15.02.2021

Memo:

Enclose please find herewith appeal in original alongwith following relevant documents in respect of Mr.Muhammad Nawaz Junior Clerk Government High School Bagh (Seniority No 619) Abbottabad regarding appeal against promotion order of Junior to Senior Clerk issued vide your office Endst.No.931290-931370 dated 15.02.2021 for further necessary action please.

1. ACR (2016-2020 in original).
2. Synopsis (2016-2020 in original).
3. Service certificate.


District Education Officer (M)
Abbottabad

Attested

Sardar Muhammad
Advocate Abbottabad

Document 1

کورٹ فیس

وکالت نامہ

بعدالت ظاہر سروسٹریٹ منوئل ٹھکانہ
 عنوان: محمد نواز نام سکیم ٹریڈنگ ایجنسی
 منجانب: اسلمند
 نوعیت مقدمہ: سروسٹریٹ

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے اسے پیروی و جواب دہی کل کاروائی متعلقہ آس مقام
سردار عزیز علی صاحب
 کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب
 موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء
 وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور
 کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار
 بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و
 قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔
 نیز بقایا تم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف
 پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف
 مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نالاش بصیغہ مفلسی کے دائرہ کرنے اور اس کے
 پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقوم: 21-4-8

محمد نواز
 Accepted by
 Muhammad Nawaz
 Sardar Muhammad
 Azeem
 Advocate Abbottabad

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR
CAMP COURT ABBOTTABAD.

Appeal No. 6312/2021

Muhammad Nawaz.....Appellant

VERSUS

Secretary to Govt: Of KPK & Others.....Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS NOS. 01 to 03

INDEX

S #	Description	Page Nos	Annexures
1	Comments along with Affidavit	01 to 04	
2	Copy of Retirement Order dated 15-04-2021	05	"A"
3	Copy of Working Papers	06 to 08	"B"
4	Copies of application	09	"C"
	Copy of order dated 22-04-2021	10	"D"

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR
CAMP COURT ABBOTTABAD.

Appeal No. 6312/2021

Muhammad Nawaz.....Appellant

VERSUS

Secretary to Govt: Of KPK & Others.....Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS NOS. 01 to 03

Respectfully Sheweth:

Para wise comments on behalf of respondents are submitted as under:

Preliminary Objections:

1. That the appellant has got no cause of action/locus standi to file the instant appeal.
2. That the instant appeal is badly time barred.
3. That the appellant has concealed the material facts from this Honorable Tribunal.
4. That the instant appeal is based on malafide intentions.
5. That this Honourable Tribunal has got no jurisdiction to entertain the present appeal as per judgment reported as 2013-SCMR-99.
6. That the appellant cannot file appeal before this Honourable Tribunal before the expiry of 90 days hence, instant appeal is premature and liable to be dismissed in view of the judgment of Honourable Supreme Court of Pakistan reported as 2011 SCMR 1111.
7. As per 2006 PLC (CS) 1034 promotion from back date being not available to a retired Civil Servant, relief claimed by appellant for retrospective promotion after his retirement was not admissible under the Law.
8. That the case of appellant was deferred from promotion due to non submission of ACR's.

9. That the Notification dated 15-02-2021 is liable to be maintained in the favour of respondents as the same was issued in accordance with the Policy.
10. That the appellant has been retired from service w.e.f 15-04-2021 on attaining the age of Superannuation vide Endst: No. 2592-93 dated 15-04-2021 hence, appellant is not entitled for promotion. (*Annexure "A"*).
11. That the appellant himself submitted an application to the respondent No. 3 wherein, he contended that his ACR's were submitted after the DPC and his case was deferred and requested for promotion hence, this act of appellant amounts to **Estoppel**.
12. That the Appellant did not come to this Honorable Tribunal with clean hands hence, not entitled for any relief.
13. That the instant appeal is against the prevailing Law, Rules & Policy.
14. That the appellant is estopped to sue by his own conduct to file this appeal.
15. That the Appellant has been treated as per Law Rules & set procedure.
16. That the instant appeal is not maintainable in its present form.
17. That the present appeal is bad for mis-joinder & non-joinder of the necessary parties.

Factual Objections:

1. That the Para No. 1, of the Service Appeal relates to the service record of the appellant hence, need no comment.
2. That the Para No. 2, of the Service Appeal relates to the service record of the appellant hence, need no comment.
3. That the Para No. 3, of the Service Appeal is subject to cogent proof as the said seniority list is unsigned and has not been notified by the competent authority.
4. In reply to Para No. 4, of the Service Appeal it is submitted that the name of appellant falls at **serial No. 603 of the working paper for departmental promotion committee (DPC) to be held on 17-09-2020** but due to the non submission of the ACR's he was deferred from promotion. Further submitted that appellant himself submitted an application to the respondent No. 3 wherein, he contended that his ACR's were submitted after the DPC and his case was deferred and requested for promotion and

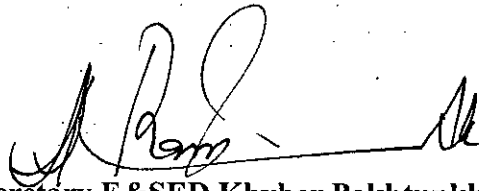
appellant was properly intimated vide Endst: No. 6004 dated 22-04-2021. (Copy of working paper, application and order dated 22-04-2021 are annexed herewith as (Annexure "B" "C" & "D").

5. That the Para No. 5, of the Service Appeal as composed is incorrect hence, denied as respondent No. 4 is not a appellate authority.

GROUND:

- a. That ground A, of the Service Appeal as composed is incorrect hence, denied as the case of the appellant was deferred for promotion due to non submission of the ACR's
- b. In reply to ground B, of the Service Appeal it is submitted that appellant himself did not submit his ACR's for the purpose of promotion due to which his case was deferred for promotion.
- c. That ground C, of the Service Appeal as composed is incorrect hence, denied.
- d. That ground D, of the Service Appeal as composed is incorrect hence, denied.
- e. That respondent seeks leave of this Honorable Court to agitate additional grounds during the course of arguments.

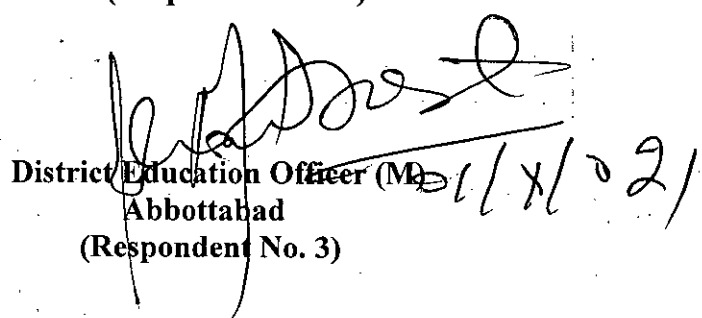
It is, therefore, in the light of above stated facts and circumstances very humbly prayed that the Service Appeal in hand may please be dismissed with cost.



Secretary E&SED Khyber Pakhtunkhwa
Peshawar
(Respondent No. 1)



Director E&SE Khyber Pakhtunkhwa
Peshawar
(Respondent No. 2)



District Education Officer (M)
Abbottabad
(Respondent No. 3)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR
CAMP COURT ABBOTTABAD.

Appeal No. 6312/2021

Muhammad Nawaz.....Appellant

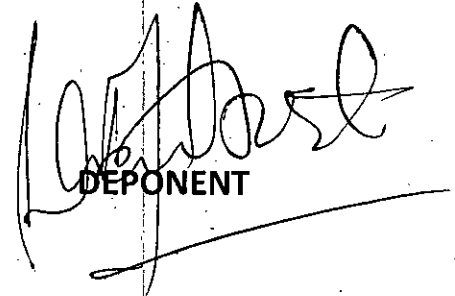
VERSUS

Secretary to Govt: Of KPK & Others.....Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS NOS. 01 to 03

AFFIDAVIT

I, Mr. Muhammad Shaukat, District Education Officer (M), Abbottabad do hereby affirm and declare that the contents of foregoing Comments are correct and true according to the best of my knowledge and belief and nothing has been suppressed from this Honorable Tribunal.


 DEPONENT

Anx "A"
OS

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

SANCTION OF RETIREMENT/ENCASHMENT

In pursuance to Judgment of the Honorable Peshawar High Court passed in WP No. 5673-P/2019 dated 19-02-2020 and Government of Khyber Pakhtunkhwa Establishment & Admn: Department (Regulation Wing) letter No. SO (Policy) E&AD/1-13/2019 dated 16-03-2020, Mr. Muhammad Nawaz, Junior Clerk, GHS Bagh, Abbottabad Shall stands retired from service w.e.from 15-04-2021 on attaining the age of 60 years as his date of birth is 14-04-1961 subject to CPLA/Appeal of the Provincial Government against aforementioned Judgment of Peshawar High Court and any order contrary as and when issued by the Apex Court of Pakistan.

He is also allowed leave encashment of 365 days in lieu of not availing LPR as due and admissible to him under the Rule.

- Note: 1. Necessary entry to this effect should be made in his service book.
2. Recovery of over payment if any, detected at any stage will be made from his gratuity/pension.

sdh
DISTRICT EDUCATION OFFICER
(MALE) ABBOTTABAD

Endst: No. 2592-93 /ADO Sports

Dated A.Abad the 25-4 /2021

Copy forwarded to the

1. District Comptroller of Accounts Abbottabad.
2. Headmaster GHS Bagh Abbottabad a/w original service book of teacher concerned
3. Budget and Account Branch Local Office
4. Official Concerned.

sdh
Dy: District Education Officer
Male Abbottabad.

Annex "B"
06

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR

WORKING PAPER FOR DEPARTMENTAL PROMOTION COMMITTEE (D.P.C) TO BE HELD ON 17-02-2020

SUBJECT: PROMOTION OF MINISTERIAL STAFF OF EDUCATION DEPARTMENT FROM THE POST OF JUNIOR CLERK (B-11)/ ASK/SK TO THE POSTS OF SENIOR CLERK (B-14) REGULAR

460 posts of the Senior Clerk (B-14) falling under the promotion quota have become vacant in the Elementary & Secondary Education Department/ newly merged Tribal Districts/ DCTE /PITE/RITE, Khyber Pakhtunkhwa due to following reasons.

- i. By promotion: = 244
- ii. New Creation + Retirement = 216

Total vacancies	460
100% by promotion	

- In terms of S.No 8 Columns 5 of the schedule attached to the Elementary & Secondary Education Department Notification No. SO (PE)/4-10/SSRC/Ministerial Staff/2013 dated 28.1.2013 (Annexure-A), the following method recruitment/promotion has been prescribed for the post of S/Clerk B-14.
 - "By promotion on seniority cum fitness from amongst the Junior Clerks, Assistant Store Keeper with at least two years services as such"
- According to the final seniority list (Annexure-B), the following panel of Junior Clerks B-11, ASK/SK is submitted for promotion to the post of Senior Clerks (B-14) in Elementary & Secondary Education Department Khyber Pakhtunkhwa. ACR/Non Involvement certificate (NIC) as noted against them:-

Sll	Sen. #	Name	Father's Name	Desi. B	D.O.A	Whether he has completed 02 years srv	Whether eligible for prom.	Remarks	Decision of D.P.C
1	1	Ahmad Khan	Gul Muhammad	J/C	05/05/1979	Yes	Yes	ACR Upto 2017	N/O
2	2	Yousaf Shah	Midrarul Haq	J/C	21/10/1981	Yes	Yes	ACR Not Submitted	N/O
3	3	M/Gul Zareen	Muhammad Miskeen	J/C	24/12/1981	Yes	Yes	ACR Not Submitted	OK
4	4	Iftikhar Ahmad	Haji Gul	J/C	06/11/1982	Yes	Yes	ACR Not Submitted	N/O
5	5	Abdul Jameel	Abdul Bari	J/C	27/12/1982	Yes	Yes	ACR Completed upto 2019	OK
6	6	Arifullah	Siffatullah	J/C	07/11/1985	Yes	Yes	ACR Not Submitted	N/O
7	7	Abdullah Khan	Muhammad Shah	J/C	09/01/1986	Yes	Yes	ACR Completed upto 2019	OK

07

25

598	Abdul Latif	Abdul Ghaffar	J/C	30/08/1997	Yes ✓	Yes	ACR Completed upto 2019	O/C
599	Sajid Mehmood	Mohammad Akbar	J/C	01/09/1997	Yes ✓	Yes	ACR Completed upto 2019	O/C
600	Muhammad Imran	Muhammad Sadiq	J/C	01/09/1997	Yes ✓	Yes	ACR Completed upto 2019	O/C
601	Asghar Ali	Muhammad Nawaz	J/C	29/09/1997	Yes ✓	Yes	ACR Not Submitted	O/C
602	Ajmal Khan	Bahder Sher	J/C	29/10/1997	Yes ✓	Yes	ACR Completed upto 2019	O/C
603	Muhammad Aslam	Muhammad Aslam	J/C	26/05/1991	Yes	Yes	ACR Not Submitted	No
604	Muhammad Farooq	Alam Sher	J/C	28/02/1993	Yes ✓	Yes	ACR Completed upto 2019	O/C
605	Mumtaz Ali Khan	Hazrat Ghulam	J/C	01/07/1994	Yes ✓	Yes	ACR Completed upto 2019	O/C
606	Siraj Din	Ghulam Yaseen	J/C	01/01/1998	Yes ✓	Yes	ACR Completed upto 2019	O/C
607	Afsar Ali	Syed Mir Jan	J/C	01/01/1998	Yes ✓	Yes	ACR Not Submitted	O/C
608	Asmatullah	Khan Syed Shah	J/C	04/01/1998	Yes	Yes	ACR Not Submitted	O/C Subject to Decision of HCR
609	Abdul Jalil Shah	Mehboob Shah	J/C	05/01/1998	Yes	Yes	ACR Not Submitted	NO
610	Anwar Hussain	Muhd: Nazif	J/C	05/01/1998	Yes	Yes	ACR Not Submitted	NO
611	Shah Jehan	Shamshad	J/C	08/01/1998	Yes ✓	Yes	ACR Completed upto 2019	O/C
612	Qismat Ali Khan	Faizullah Khan	J/C	12/01/1998	Yes ✓	Yes	ACR Not Submitted	O/C
613	Noorul Amin	Mohammad Nasim	J/C	15/01/1998	Yes ✓	Yes	ACR Completed upto 2019	O/C
614	Ihsan Muhammad	Wali Muhammad	J/C	16/01/1998	Yes ✓	Yes	ACR Completed upto 2019	O/C
615	Zila Dar Khan	Akbar Ali	J/C	16/01/1998	Yes ✓	Yes	ACR Completed upto 2019	O/C
616	Fazal Naeem	Muhammad Saleem	J/C	17/01/1998	Yes	Yes	ACR Not Submitted	NO
617	Taj Wali	Shamsur Rehman	J/C	17/01/1998	Yes	Yes	ACR Not Submitted	NO

08
22

656	Hidayat Ullah	Badshah Rahim	J/C	03/05/1998	Yes	Yes	ACR Completed upto 2019
657	Fazal Rahman	Abdullah Jan	J/C	13/05/1998	Yes	Yes	ACR Completed upto 2019
658	Sami Ul Qadus	Haji Abdul Qadus	J/C	13/05/1998	Yes	Yes	ACR Completed upto 2019
659	Hussain Ahmad	Baghi Sahah	J/C	03/06/1998	Yes	Yes	ACR Completed upto 2019
660	Muhammad Ibrahim	Badshah Rahim	J/C	03/06/1998	Yes	Yes	ACR Completed upto 2019
661	Gonar Rahman	Firdos Khan	J/C	01/01/1998	Yes	Yes	ACR Completed upto 2019
662	Kidwai Shah J/C	Raj Mohammad	J/C	08/06/1998	Yes	Yes	ACR Completed upto 2019
663	Faris Khan J/C	Khitab Gul	J/C	12/06/1998	Yes	Yes	ACR Completed upto 2019
664	Mansha Ahmad	Mohammad Iqbal	J/C	15/06/1998	Yes	Yes	ACR Completed upto 2019
665	Muhammao Zafar	Amir Sultan	J/C	08/07/1998	Yes	Yes	ACR Not Submitted
666	Fazal Qayum	Ghulam Fareed	J/C	19/11/1998	Yes	Yes	ACR Completed upto 2019
667	Shafiq Ur Rehman	Rab Nawab	J/C	24/11/1998	Yes	Yes	ACR Completed upto 2019
668	Mazhar Shah	Gulab Shah	J/C	01/12/1998	Yes	Yes	ACR Completed upto 2019
669	M. Noman Zeb	Alam Zeb Khan	J/C	12/12/1998	Yes	Yes	ACR Not Submitted
670	Mohammad Iftikhar	Nowsher Khan	J/C	23/12/1998	Yes	Yes	ACR Not Submitted
671	Hidayat Ur Rehman	M/Waris Khan	J/C	07/01/1999	Yes	Yes	ACR Completed upto 2019
672	Shoukat Yousaf	Muhammad Yousaf	J/C	23/03/1999	Yes	Yes	ACR Completed upto 2019
673	Muhammad Sadeeq Shah	Rizwan Ullah	J/C	05/04/1999	Yes	Yes	ACR Completed upto 2019

D:\numan\junior clerk final seniority list 2019\Junior Clerk\final Seniority list 20-20\working paper jclerk 2020 5-8-2020 doc

Asim Ali
 Assistant Director
 Directorate EESE
 P. O. Bahawalpur



Phone: 091-9225344

Email: ddadmn.ese@gmail.com

Annex "C"
89

To

The District Education Office
(Male) Abbottabad

6204
22-4-2021

Subject:

APPLICATION IN R/O MR. MUHAMMAD NAWAZ J/C GHS BAGH
ABBOTTABAD

Memo.

I am directed to refer to your letter No: 2114 Dated 26-03-2021 on the subject cited above and to inform you that Mr. Muhammad Nawaz J/C GHS Bagh Abbottabad was deferred from promotion due to non submission of ACRs. His ACRs has not received in this Directorate.

I am further directed to ask you to inform the applicant to wait till next DPC for promotion and submit his ACRs as and when asked by this Directorate for promotion from J/Clerk to Sr. Clerk please.

Assistant Director (Admn)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

t: No. _____ /F.No: 61/A-23/ Vol IV /MS/Abbottabad Dated Peshawar the _____ 2021

Copy forwarded for information to the:-

Mr. Muhammad Nawaz J/Clerk GHS Bagh Abbottabad
Master File.

Assistant Director (Admn)
Directorate of Elementary & Secy. Education
Khyber Pakhtunkhwa, Peshawar

n Data\MS\Transfer\Muhammad Nawaz J. Clerk.doc

خدمت خفا - ڈی ایچ ای او سیل سینڈری ایئر

معاون ایس ایل / درخواست

مورد باہر گزارش پندرہ سائٹس نے فورم 2021
کو آگے لگانے کی ACRs پر اس پر 300 کے تحت
ڈائریکٹر ایئر لائننگز ایئر سینڈری ایئر ایئر لائننگز
کو ارسال کی تھی

خفا بہائی

سائٹس کی ACRs DPCC کے لیے بھیجے
سیورٹس میں جسکی وجہ سے سائٹس کی پروموشن میں
سیورٹی اور سائٹس کے تیس دیپ ڈیپ کے لیے
سینڈ ایئر لائننگز سائٹس کے تیس دیپ ڈیپ کے لیے
جو پندرہ تندر سے سینڈری ایئر لائننگز کے لیے

العارضین 5-89-8405-5-1318

سائٹس کے لیے پندرہ تندر کو مختلف مقامات پر
باج ایئر لائننگز

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR AT CAMP COURT ABBOTTABAD.

Appeal No. 6312/2021

Muhammad Nawaz.....Appellant

VERSUS

Secretary to Govt: Of KPK & Others.....Respondents

REPLY ON BEHALF OF RESPONDENT NO. 5

Respectfully Sheweth:

Reply on behalf of respondent No. 5 is as under:

1. That the above service appeal is pending for adjudication before this Honourable Tribunal and today case is fixed for submission of reply.
2. That department / respondents No. 1 to 3 have submitted their reply and the said reply may please also be considered the reply on behalf of the respondent No. 5

It is therefore, respectfully prayed that appeal inhand may please be dismissed.



Muhammad Bilal
(Respondent No. 5)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR AT CAMP COURT ABBOTTABAD.

Appeal No. 6312/2021

Muhammad Nawaz.....Appellant

VERSUS

Secretary to Govt: Of KPK & Others.....Respondents

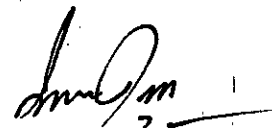
REPLY ON BEHALF OF RESPONDENT NO. 4

Respectfully Sheweth:

Reply on behalf of respondent No. 4 is as under:

1. That the above service appeal is pending for adjudication before this Honourable Tribunal and today case is fixed for submission of reply.
2. That department / respondents No. 1 to 3 have submitted their reply and the said reply may please also be considered the reply on behalf of the respondent No. 4

It is therefore, respectfully prayed that appeal inhand may please be dismissed.



Muhammad Ashfaq
(Respondent No. 4)

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Muhammad Nawaz

V E R S U S

Secretary to Government of Khyber Pakhtunkhwa & others

SERVICE APPEAL

REJOINDER ON BEHALF OF APPELLANT

Respectfully Sheweth;

PRELIMINARY OBJECTIONS:

- 1) Para No.1 of the reply is incorrect. Appellant has got cause of action.
- 2) Para No.2 of the reply is incorrect appeal of the appellant is well within time and version of the respondents is contradictory.
- 3) Para No.3 of the reply is incorrect appellant has not concealed any material facts from this Hon'ble Court.
- 4) Para No.4 of the reply is incorrect the appellant did not filed this appeal on the basis of malafide, but the

1

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Muhammad Nawaz

V E R S U S

Secretary to Government of Khyber Pakhtunkhwa & others

SERVICE APPEAL

REJOINDER ON BEHALF OF APPELLANT

Respectfully Sheweth;

PRELIMINARY OBJECTIONS:

- 1) Para No 1 of the reply is incorrect. Appellant has got cause of action.
- 2) Para No.2 of the reply is incorrect appeal of the appellant is well within time and version of the respondents is contradictory.
- 3) Para No.3 of the reply is incorrect appellant has not concealed any material facts from this Hon'ble Court.
- 4) Para No.4 of the reply is incorrect the appellant did not filed this appeal on the basis of malafide, but the

respondents with malafide deprive the appellant from his lawful rights of promotion.

- 5) Para No.5 of the reply is incorrect this Hon'ble Court has got jurisdiction to entertain instant appeal and judgment of August Supreme Court of Pakistan 2013 SCMR Page 99 not applicable in this case because above refer judgment was relates to the fitness while the appellant case is related the question of eligibility which is primarily to the terms and condition of service therefore this tribunal has jurisdiction.
- 6) Para No.6 of the reply is incorrect and contradictory.
- 7) Para No.7 of the reply is incorrect appellant filed this appeal during service, inspite of this the appellant has the right to get promotion after retirement as per reported judgment of August Supreme Court of Pakistan PLD 1994 Page 233 and 1995 SCMR Page No.18. Moreover working paper for promotion of the appellant prepare by the departmental promotion committee on 17.09.2020 much before retirement. Thus as per judgment of the August Supreme Court of Pakistan 2012 SCMR Page 126 and unreported judgment of Supreme Court passed on CP

respondents with malafide deprive the appellant from his lawful rights of promotion.

5) Para No 5 of the reply is incorrect this Hon'ble Court has got jurisdiction to entertain instant appeal and judgment of August Supreme Court of Pakistan 2013 SCMR Page 99 not applicable in this case because above refer judgment was related to the fitness while the appellant case is related the question of eligibility which is primarily to the terms and condition of service therefore this tribunal has jurisdiction

6) Para No 6 of the reply is incorrect and contradictory.

7) Para No 7 of the reply is incorrect appellant filed this appeal during service, inspite of this the appellant has the right to get promotion after retirement as per reported judgment of August Supreme Court of Pakistan PLD 1994 Page 233 and 1995 SCMR Page No.18 Moreover working paper for promotion of the appellant prepare by the departmental promotion committee on 17.09.2020 much before retirement. Thus as per judgment of the August Supreme Court of Pakistan 2012 SCMR Page 126 and unreported judgment of Supreme Court passed on CP

No.40/2021. The appellant is entitled to get promotion even after retirement from the date when his junior were promoted i.e. 17.09.2020.

- 8) Para No.8 of the reply is incorrect, that respondent did not submit the appellant ACR with malafide basis, while the respondent was duty bound to submit the appellant ACR before D PC. However, according to the judgment 2006 PLC (CS) Page No.1268 the promotion of the appellant could not be deferred due to non submission of ACR.
- 9) Para No.9 of the reply is incorrect respondents issued notification dated 15.02.2021 against the law, rules with malafide and discriminatory, hence not sustainable under the law.
- 10) Para No.10 of the reply is incorrect appellant filed this appeal during service. Hence reply of the respondents is irrelevant.
- 11) Para No.11 of the reply is incorrect respondents with malafide not submitted ACR of the appellant while the respondents were duty bound to submit the appellant

No.402021. The appellant is entitled to get promotion even after retirement from the date when his junior were promoted i.e. 17.09.2020.

8) Para No.8 of the reply is incorrect, that respondent did not submit the appellant ACR with malaise basis while the respondent was duty bound to submit the appellant ACR before D PC. However, according to the judgment 2008 PLC (CS) Page No.1268 the promotion of the appellant could not be deferred due to non submission of ACR.

9) Para No.9 of the reply is incorrect respondents issued notification dated 15.02.2021 against the law, rules with malaise and discriminatory, hence not sustainable under the law.

10) Para No.10 of the reply is incorrect appellant filed this appeal during service. Hence reply of the respondents is irrelevant.

11) Para No.11 of the reply is incorrect respondents with malaise not submitted ACR of the appellant while the respondents were duty bound to submit the appellant

ACR, and punishment for wrong act of the respondent cannot be given to the appellant.

- 12) Para No.12 of the reply is incorrect appellant filed this appeal with clean hands.
- 13) Para No.13 of the reply is incorrect appeal of the appellant is in accordance with law & rules.
- 14) Para No.14 of the reply is incorrect.
- 15) Para No.15 of the reply is incorrect appellant has not tread as per law rules.
- 16) Para No.16 of the reply is incorrect appeal is maintainable in its present form.
- 17) Para No.17 of the reply is incorrect, the instant appeal is not bad for mis-joinder of necessary parties in the instant appeal.

FACTUAL OBJECTION:

1&2. Para No.1&2 of the reply need no reply.

3. Para No.3 of the reply is incorrect.
4. Para No.4 of the reply is incorrect respondents with malafide not submitted ACR of the appellant before DPC while the respondents was duty bound to submit ACR of the appellant and the punishment for wrong act of the respondents cannot be given to appellant.
5. Para No.5 of the reply is incorrect departmental appeal of the appellant is in accordance with law.

GROUND:

- a. Para a grounds of the reply is incorrect comprehensive reply is already been given in Para No.4 of the factual objection.
- b. Para b grounds of the reply is incorrect in reply to para b it is submitted that the ACR of any employee does not belong to employee and it under the control of the competent authority and he submitted it to the departmental promotion committee.

c&d. Para c&d grounds of the reply is incorrect
Para of the appellant is reiterated.

It is, therefore, respectfully prayed that on acceptance of this appeal respondents may graciously be directed for consideration of promotion granted to the appellant in post of senior clerk from the date when his junior were promoted i.e. 15.12.2021 with all back benefits in the interest of justice. Any other relief which this Hon'ble Court deem fit and proper may also be granted.

...APPELLANT

Through Counsel:



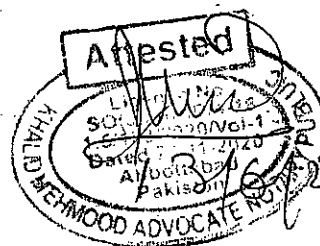
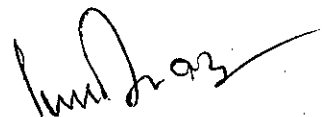
(SARDAR MUHAMMAD AZEEM)
Advocate High Court Abbottabad

Dated:- 13/6 /2022

AFFIDAVIT

I, Muhammad Nawaz S/o Muhammad Aslam, Ex-Junior Clerk Government High School Bagh, Abbottabad, do hereby solemnly affirm and declare on Oath that the contents of instant **Rejoinder** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble tribunal.

Dated:- 11/6 /2022

...APPELLANT

Para c&d grounds of the reply is incorrect

Para of the appellant is reiterated.

It is, therefore, respectfully prayed that on acceptance of this appeal respondents may graciously be directed for consideration of promotion granted to the appellant in post of senior clerk from the date when his junior were promoted i.e. 15.12.2021 with all back benefits in the interest of justice. Any other relief which this Hon'ble Court deem fit and proper may also be granted.

...APPELLANT

Through Counsel:

(SARDAR MUHAMMAD AZEEM)
Advocate High Court Abbottabad

Dated: 15/12/2022

AFFIDAVIT

I, Muhammad Nawaz S/o Muhammad Aslam, Ex-Junior Clerk Government High School Bagni, Abbottabad, do hereby solemnly affirm and declare on Oath that the contents of instant Rejoinder are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble tribunal.

...APPELLANT

Dated: 15/12/2022

Form "C" (Revised)
Assignment of Clerks.

Annex A)

⑦

Government of Khyber Pakhtunkhwa

EDUCATION DEPARTMENT.

FOR THE PERIOD: - From 01-01-2016 to 31-12-2016

PART-I

1. Name :- Muhammad Nawaz SIO Muhammad Aslam
 2. Designation :- J/Clerk
 3. Date of Birth :- 16-04-1961 3. (a) Qualification SSC.
 4. Date of Entry into Govt: Service :- 14-05-1991
 5. Branches in which employed during the year, with period: - J/C GHS. Bagh Ayabad

PART-II

A. PERFORMANCE	AI	A	B	C	D
(1) Referencing, paging of notes and correspondence			Q		
(2) Movement of files and record of suspense cases			Q		
(3) Keeping files and papers in tidy condition			Q		
(4) Promptness and accuracy in disposing of work		Q			
B. PERSONAL TRAITS					
(5) Intelligence		Q			
(6) Knowledge of procedure and regulations		Q			
(7) Punctuality			Q		
(8) Co-Operation and tact			Q		
(9) Amiability to discipline			Q		
(10) Skill and Drafting			Q		
(11) Integrity: -					
(i) Incorruptible					<input checked="" type="checkbox"/>
(ii) Reported to be corrupt.....					<input type="checkbox"/>
(iii) Believed to be corrupt because of:					<input type="checkbox"/>
(a) Monetary consideration.....					<input type="checkbox"/>
(b) Other considerations.....					<input type="checkbox"/>
(12) Knowledge of Typing			YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	
(13) Trust worthiness in confidential and secret matters.			YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	
(14) Any disciplinary action taken during the period under report.			YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	

8

PART-III

	By Reporting Officer	By Countersigning Officer
(a) Recommended for accelerated promotion	<input type="checkbox"/>	<input type="checkbox"/>
(b) Fit for Promotion.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(c) Recently promoted /appointed -consideration for Promotion pre-mature	<input type="checkbox"/>	<input type="checkbox"/>
(d) Not yet fit for promotion.	<input type="checkbox"/>	<input type="checkbox"/>
(e) Unfit for further Promotion.	<input type="checkbox"/>	<input type="checkbox"/>

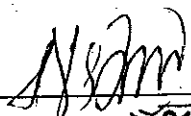
PART-IV

General Assessment	By Reporting Officer	By Countersigning Officer
(i) VERY GOOD		
(ii) GOOD	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(iii) AVERAGE		
(iv) BELOW AVERAGE		
(v) POOR		

PEN PICTURE

He is an honest & Hardworking.


Dated 17-2-2021

Reporting Officer's Signature 
 Name (in Block Letter) MUHAMMAD NAZIR
 Designation Head Master

HEAD MASTER
 Govt. High School Bag
 Abbottabad

General Remark by higher officer:-

Dated

Countersigning Officer's Signature 
 Name (in Block Letter) Muhammad Tanveer
 Designation District Education Officer
 (Male) Abbottabad

Form "G" (Revised)
Assignment of Clerks.

Government of Khyber Pakhtunkhwa

EDUCATION DEPARTMENT.

FOR THE PERIOD: - From 01-01-2017 to 31-12-2017

PART-I

1. Name :- Muhammad Nawaz S/O Muhammad Aslam
2. Designation :- J/Clerk
3. Date of Birth :- 16-04-1961 3. (a) Qualification SSC
4. Date of Entry into Govt. Service :- 14-05-1991
5. Branches in which employed during the year, with period: - J/C GHS. Bagh Ajabal

PART-II

A. PERFORMANCE	AI	A	B	C	D
(1) Referencing, paging of notes and correspondence		B			
(2) Movement of files and record of suspense cases		B			
(3) Keeping files and papers in tidy condition		B			
(4) Promptness and accuracy in disposing of work		B			
B. PERSONAL TRAITS					
(5) Intelligence		B			
(6) Knowledge of procedure and regulations			B		
(7) Punctuality		B			
(8) Co-Operation and tact			B		
(9) Amenability to discipline			B		
(10) Skill and Drafting			B		

- (11) Integrity: -
- | | |
|---|-------------------------------------|
| (i) Incorruptible | Assessment |
| (ii) Reported to be corrupt..... | <input checked="" type="checkbox"/> |
| (iii) Believed to be corrupt because of : | <input type="checkbox"/> |
| (a) Monetary consideration..... | <input type="checkbox"/> |
| (b) Other considerations..... | <input type="checkbox"/> |

- | | | |
|--|-------------------------------------|-------------------------------------|
| (12) Knowledge of Typing | YES | NO |
| (13) Trust worthiness in confidential and secret matters. | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (14) Any disciplinary action taken during the period under report. | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

PART-III

	By Reporting Officer	By Countersigning Officer
(a) Recommended for accelerated promotion	<input type="checkbox"/>	<input type="checkbox"/>
(b) Fit for Promotion.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(c) Recently promoted /appointed –consideration for Promotion pre-mature	<input type="checkbox"/>	<input type="checkbox"/>
(d) Not yet fit for promotion.	<input type="checkbox"/>	<input type="checkbox"/>
(e) Unfit for further Promotion.	<input type="checkbox"/>	<input type="checkbox"/>

PART-IV

General Assessment	By Reporting Officer	By Countersigning Officer
(i) VERY GOOD		
(ii) GOOD	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(iii) AVERAGE		
(iv) BELOW AVERAGE		
(v) POOR		

PEN PICTURE

He knows his job very well.

Reporting Officer's Signature

Name (in Block Letter)

Designation

Muhammad Nazir
 HEAD MASTER
 Gov. High School Bag
 Abbottabad
 MUHAMMAD NAZIR
 Head Master

Dated 17-2-2021

General Remark by higher officer:-

Countersigning Officer's Signature

Name (in Block Letter)

Designation

Muhammad Tanveer
 Muhammad Tanveer
 Dy. District Education Officer
 (Male) Abbottabad

Dated

Form "G" (Revised)
Assignment of Clerks.

Government of Khyber Pakhtunkhwa

EDUCATION DEPARTMENT.

FOR THE PERIOD: - From 01-01-2018 to 31-12-2018

PART-I

1. Name :- Muhammad Nawaz SIO Muhammad Aslam
2. Designation :- J/Clerk
3. Date of Birth :- 16-04-1961 3. (a) Qualification SSC.
4. Date of Entry into Govt. Service :- 14-05-1991
5. Branches in which employed during the year, with period: - J/C GHS Bagh Mabal

PART-II

A. PERFORMANCE	AI	A	B	C	D
(1) Referencing, paging of notes and correspondence		2			
(2) Movement of files and record of suspense cases		2			
(3) Keeping files and papers in tidy condition		2			
(4) Promptness and accuracy in disposing of work		2			
B. PERSONAL TRAITS					
(5) Intelligence		2			
(6) Knowledge of procedure and regulations			2		
(7) Punctuality		2			
(8) Co-Operation and tact			2		
(9) Amenability to discipline			2		
(10) Skill and Drafting			2		

(11) Integrity: -

Assessment

- (i) Incorruptible
- (ii) Reported to be corrupt.....
- (iii) Believed to be corrupt because of :
 - (a) Monetary consideration.....
 - (b) Other considerations.....

- (12) Knowledge of Typing
- (13) Trust worthiness in confidential and secret matters.
- (14) Any disciplinary action taken during the period under report.

YES	NO
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>

PART-III

	By Reporting Officer	By Countersigning Officer
(a) Recommended for accelerated promotion	<input type="checkbox"/>	<input type="checkbox"/>
(b) Fit for Promotion.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(c) Recently promoted /appointed -consideration for Promotion pre-mature	<input type="checkbox"/>	<input type="checkbox"/>
(d) Not yet fit for promotion.	<input type="checkbox"/>	<input type="checkbox"/>
(e) Unfit for further Promotion.	<input type="checkbox"/>	<input type="checkbox"/>

PART-IV

General Assessment	By Reporting Officer	By Countersigning Officer
(i) VERY GOOD		
(ii) GOOD	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(iii) AVERAGE		
(iv) BELOW AVERAGE		
(v) POOR		

PEN PICTURE

He is an honest & punctual official.

Reporting Officer's Signature [Signature]
 Name (in Block Letter) MUHAMMAD
 Designation Head Master

Dated 17.2.2021

General Remark by higher officer:-

Countersigning Officer's Signature [Signature]
 Name (in Block Letter) Muhammed Tanveer.
 Designation Dy: District Education Officer (Male) Abbottabad

Dated _____

Form "G" (Revised)
Assignment of Clerks.

Government of Khyber Pakhtunkhwa

EDUCATION DEPARTMENT.

FOR THE PERIOD: - From 01-01-2019 to 31-12-2019

PART-I

1. Name : Muhammad Nawaz S/O Muhammad Aslam
2. Designation :- J/Clerk
3. Date of Birth :- 16-04-1961 3. (a) Qualification SSC.
4. Date of Entry into Govt: Service :- 14-05-1991
5. Branches in which employed during the year, with period: - J/C GHS. Bagh Ajabal

PART-II

A. PERFORMANCE	AI	A	B	C	D
(1) Referencing, paging of notes and correspondence		2			
(2) Movement of files and record of suspense cases		2			
(3) Keeping files and papers in tidy condition		2			
(4) Promptness and accuracy in disposing of work		2			
B. PERSONAL TRAITS					
(5) Intelligence		2			
(6) Knowledge of procedure and regulations			2		
(7) Punctuality		2			
(8) Co-Operation and tact			2		
(9) Amenability to discipline			2		
(10) Skill and Drafting			2		

(11) Integrity: -

- (i) Incorruptible
- (ii) Reported to be corrupt.....
- (iii) Believed to be corrupt because of :
- (a) Monetary consideration.....
- (b) Other considerations.....

Assessment

(12) Knowledge of Typing

(13) Trust worthiness in confidential and secret matters.

(14) Any disciplinary action taken during the period under report.

PART-III

	By Reporting Officer	By Countersigning Officer
(a) Recommended for accelerated promotion	<input type="checkbox"/>	<input type="checkbox"/>
(b) Fit for Promotion.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(c) Recently promoted /appointed -consideration for Promotion pre-mature	<input type="checkbox"/>	<input type="checkbox"/>
(d) Not yet fit for promotion.	<input type="checkbox"/>	<input type="checkbox"/>
(e) Unfit for further Promotion.	<input type="checkbox"/>	<input type="checkbox"/>

PART-IV

General Assessment	By Reporting Officer	By Countersigning Officer
(i) VERY GOOD		
(ii) GOOD	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(iii) AVERAGE		
(iv) BELOW AVERAGE		
(v) POOR		

PEN PICTURE

He takes keen interest in his job

Reporting Officer's Signature

Name (in Block Letter)

Designation

Muhammad
HEAD MASTER
 Govt. High School Bag
 Abbottabad

Dated 17.2.2021

General Remark by higher officer:-

Countersigning Officer's Signature

Name (in Block Letter)

Designation

Muhammad Tanveer
Dy. District Education Officer
 (Male) Abbottabad

Dated

Form "G" (Revised)
Assignment of Clerks.

Government of Khyber Pakhtunkhwa

EDUCATION DEPARTMENT.

FOR THE PERIOD: - From 01-01-2020 to 31-12-2020

PART-I

1. Name :- Muhammad Nawaz SIO Muhammad Aslam
2. Designation :- J/Clerk
3. Date of Birth :- 16-4-1961 3. (a) Qualification SSC.
4. Date of Entry into Govt. Service :- 14-05-1991
5. Branches in which employed during the year, with period: - J/C EHS. Bagh Ajabal

PART-II

A. PERFORMANCE	AI	A	B	C	D
(1) Referencing, paging of notes and correspondence		<input checked="" type="checkbox"/>			
(2) Movement of files and record of suspense cases		<input checked="" type="checkbox"/>			
(3) Keeping files and papers in tidy condition		<input checked="" type="checkbox"/>			
(4) Promptness and accuracy in disposing of work		<input checked="" type="checkbox"/>			
B. PERSONAL TRAITS					
(5) Intelligence		<input checked="" type="checkbox"/>			
(6) Knowledge of procedure and regulations		<input checked="" type="checkbox"/>			
(7) Punctuality		<input checked="" type="checkbox"/>			
(8) Co-Operation and tact			<input checked="" type="checkbox"/>		
(9) Amenability to discipline			<input checked="" type="checkbox"/>		
(10) Skill and Drafting			<input checked="" type="checkbox"/>		

(11) Integrity: -

- (i) Incorruptible
- (ii) Reported to be corrupt.....
- (iii) Believed to be corrupt because of :
- (a) Monetary consideration.....
- (b) Other considerations.....

Assessment

(12) Knowledge of Typing

(13) Trust worthiness in confidential and secret matters.

(14) Any disciplinary action taken during the period under report.

YES

NO

PART-III

	By Reporting Officer	By Countersigning Officer
(a) Recommended for accelerated promotion	<input type="checkbox"/>	<input type="checkbox"/>
(b) Fit for Promotion.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(c) Recently promoted /appointed -consideration for Promotion pre-mature	<input type="checkbox"/>	<input type="checkbox"/>
(d) Not yet fit for promotion.	<input type="checkbox"/>	<input type="checkbox"/>
(e) Unfit for further Promotion.	<input type="checkbox"/>	<input type="checkbox"/>

PART-IV

General Assessment	By Reporting Officer	By Countersigning Officer
(i) VERY GOOD		
(ii) GOOD	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(iii) AVERAGE		
(iv) BELOW AVERAGE		
(v) POOR		

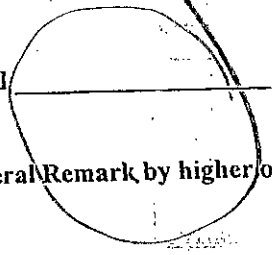
PEN PICTURE

He is willing worker - He is trustable official.

Reporting Officer's Signature [Signature]
 Name (in Block Letter) MUHAMMAD [Signature]
 Designation Head Master Govt. High School Bagh Abbattabad

Dated _____

General Remark by higher officer:-



Countersigning Officer's Signature [Signature]
 Name (in Block Letter) Muhammed Tanveer.
 Designation _____

Dated _____

Head Master Govt. High School Bagh Abbattabad

OFFICE OF THE HEAD MASTER GOVT HIGH SCHOOL BAGH ABBOTTABAD

SYNOPSIS

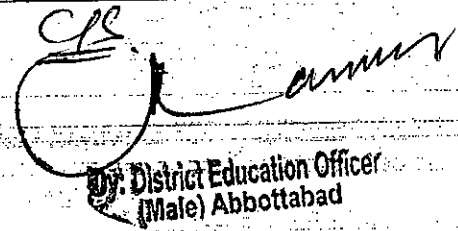
Synopsis of PERS/ACRs in respect of

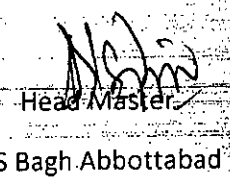
MR. MUHAMMAD NAWAZ

Designation: JUNIOR CLERK

Date of birth: 16-04-1961

S.NO	YEAR	Pin Picture	General Remarks	Adverse/if any	Expunged	Remarks
01	2016	Good	He is an honest and hard working	No	NA	Nil
02	2017	V.Good	He knows his job very well	No	NA	Nil
03	2018	V.Good	He is an honest and Punctual official	No	NA	Nil
04	2019	V.Good	He takes keen interest in his job	No	NA	Nil
05	2020	Good	He is trustable official	No	NA	Nil

CR

 Dy. District Education Officer
 (Male) Abbottabad


 Head Master
 GHS Bagh Abbottabad


Head Master
 Govt. High School Bagh
 Abbottabad


(1)

SERVICE CERTIFICATE

18

Certified that Mr MUHAMMAD NAWAZ S/O MUHAMMAD ASLAM is a permanent government servant in Education Department since 14-05-1991 up to date. At presently he is working as a J/Clerck at Government High School Bagh Abbottabad.


By District Education Officer
(Male) Abbottabad


Head Master
Govt High School Bagh ATD