### FORMOF ORDER SHEET

Court of\_\_\_

### 12(2) CPC Petition No. 362/2022

Order or other proceedings with signature of judge or Magistrate Date of order S.No. proceedings 3 2 1 The application U/S 12(2) CPC in appeal no. 6608/2021 10/06/2022 1 submitted by Director E&SE Department may be entered in the relevant Register and put up to the Court for proper order please. REGISTRAR 2- 5-7-7022 Palitioner impri-By Telephere. 11-8-22 This application be put up before Division Bench at Peshawar on 13.9.22. Original file be requisitioned. Notices to the petitioner and his counsel be also issued for the date fixed. **CHAIRMAN** 



**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE** 

12(2) CPC Petition No. 362/2022

Application No: \_\_\_\_\_/2022 in Service Appeal No.6608/2021

### VERSUS

Abdul Hameed PHST District Haripur......Respondent

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Assistant Director (Lit: II) E&SE Department, Khyber Pakhtunkhwa, Peshawar.



### **BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE**

12 C2> CPE fetition No-362/2022

Application No: \_\_\_\_\_/2022 in Service Appeal No.6608/202

### VERSUS

Abdul Hameed PHST District Haripur.....Respondent

APPLICATION UNDER SECTION 12 (2) CPC 1908 AGAINST THE JUDGMENT DATED 09-11-2021 UNDER CASE TITLE ABDUL HAMEED VS GOVT; OF KHYBER PAKHTUNKHWA & OTHERS OBTAINED BY THE APPELLANT/RESPONDENT ON MISREPRESENTATION, FRAUD & CONCEALMENT OF MATERIAL FACTS FROM THIS HONORABLE TRIBUNAL TO THE EXTENT AS PER RECORD OF PRODUCING FAKE & BOGUS WORKING PAPER Dated 11-11-2019 S.NO. 06 WITH SENIORITY NO. 337 FOR PROMOTION AGAINST THE SST POST INSTEAD OF THE AUTHENTIC WORKING PAPERS SUBMITTED BY THE DISTRICT EDUCATION OFFICER (MALE) HARIPUR FOR PROMOTIONS FROM PHST TO SST, WHEREIN, THE NAME OF THE RESPONDENT HAS NOT BEEN INCLUDED BY THE DEPARTMENT.

PRAYERON THE ACCEPTANCE OF THIS APPLICATION, THE<br/>JUDGMENT DATED 09-11-2021 IN SERVICE APPEAL<br/>6608/2021 UNDER CASE TITLE ABDUL HAMMED VS<br/>GOVT; OF KHYBER PAKHTUNKHWA & OTHERS<br/>OBTAINED BY THE APPELLANT/RESPONDENT ON<br/>MISREPRESENTATION, FRAUD & CONCEALMENT OF<br/>MATERIAL FACTS FROM THIS HONORABLE<br/>TRIBUNAL MAY VERY GRIEVOUSLY BE PLEASED TO<br/>SET-ASIDE/RECALLED IN FAVOR OF THE APPLICANTS<br/>UNDER THE ABOVE CITED PROVISION OF LAW.

### **Respectfully Sheweth:-**

The applicant/E&SE Khyber Pakhtunkhwa Peshawar submits as under:-

### **Preliminary Objections.**

1 That the Appellant (herein after referred as Respondent) in the instant application has got no cause of action/locus standi.

2

- 2 That the Respondent has concealed material facts from this Honorable Tribunal in the instant service appeal.
- 3 That the Respondent has not come to this Honorable Tribunal with clean hands.
- 4 That the Respondent is not entitled for the relief he has sought from this Honorable Tribunal.
- 5 That the case of the Respondent is against the prevailing law & rules.
- 6 That the case of the Respondent on mala fide intentions just to put extra pressure on the Applicants for gaining illegal service benefits.
- 7 That the Respondent is not competent to file the instant appeal against the Respondents.
- 8 That the Respondent has produced fake & bogus working papers for promotions against the SST post as agitated in the main reply to the title Service Appeal before this Honorable Bench.
- 9 That the Execution Petition No. 32/2022 of the Respondent is not competent under the Law in field.

### **ON FACTS**:

1) That a meeting of the Departmental Promotion Committee meeting was held on 11-11-2019 10:30 AM in the Directorate of E&SE Khyber Pakhtunkhwa Peshawar for the grant of promotions to the SCT/CT/SDM?DM/SAT/AT/STT/TT/Senior Qari/PSHT/PST & PST (Males) to the post of SST (G) (B/C) and SST (P/M) chaired by the Director E&SE Khyber Pakhtunkhwa Peshawar, attended by the Deputy Secretary S/M, Deputy Director & DEO (M) Haripur, who, has submitted authentic working papers for promotions under 20% revered quota from PHST to SST in view of the 06 available/vacant post in District Haripur, wherein, the name of the present Appellant/Respondent has neither been mentioned nor proposed by the DEO (M) Haripur on the grounds of his below seniority in the Department.

.....(Copies of the minutes of the meeting & working papers of the DEO (M) Haripur are attached as Annexure-A & B).

- 3) That in the meantime the Respondent has managed a fake & bogus working papers dated 11-11-2019 under the signature of District Education Officer (M) Abbottabad, whereas, in the heading of the said fake & bogus working papers office of the District Education Officer (M) Haripur has been written which is against the factual position. Furthermore, the DPC was held on dated 11-11-2019 in the Directorate of E&SE Khyber Pakhtunkhwa Peshawar & on the same date of 11-11-2019 the appellant is showing himself as an eligible for promotion from PHST to SST at the S. No.06 which is fake & bogus in view of his low merit/Seniority position in his Cadre in the Department as evident from the original working papers submitted by the District Education Officer (M) Haripur to the DPC on dated 11-11-2019, wherein, the name of the Respondent has not been mentioned & proposed for promotion as SST.

......(Copy of the fake & bogus working papers is Annexure-D).

4) *That* The statement/plea of the appellant now Respondent in the instant case is baseless & without any cogent poof & justification & is liable to be rejected in favor of the applicants as no Departmental appeal has been filled by the appellant now Respondent to the appellate authority against the impugned order & notification, hence, got finality, however, the Respondent Department further submit on the following grounds inter alia: -

### **ON GROUNDS**

A. The Appellant/Respondent has been treated as per law, rules & policy by the Respondent Department in the instance case, hence, the stand of the appellant is baseless & liable to be rejected.

3

- **B.** The statement of the Appellant/Respondent in the instant application is without any cogent reason & justification on the grounds as agitated in the foregoing paras of the present reply by the Respondents.
- C. The plea of the Appellant/Respondent in the instant application is without justification & liable to be rejected as the mentioned reported judgments of the apex courts of law do not apply upon the case of the appellant in the given circumstances of the case.
- **D.** That the act of the E&SE Department is within legal sphere and liable to be maintained in favor of the Applicants.
- E. That valuable legal rights are attached with the instants case of the Applicants/E&SE Department Khyber Pakhtunkhwa Peshawar.
- F. That the instant case/applications is within limitation & the Honorable Service Tribunal has got jurisdiction to entertain & even should have been considered the facts & circumstances of the case prior to the announcement of the order dated 19-11-2021 in favor of the Department on good & even legal grounds & if the order as mentioned above of this Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar is implemented by the E&SE Department/Applicants then, a chain of un necessary litigation for the Department would raise from the illegal orders of this Service Tribunal.

.....(Copies of the Service Appeal, Reply & Judgment are Annexure-E, F & G).

**G.** That the Appellant now Respondent in the instant application is habitual litigant against the Department for no cause of action accrued to him & the Tribunal did not bother to take pain in consulting the relevant provision of law, rules & authentic record in filed & has thus passed the impugned orders without criteria against the Applicants which if implemented would amount to huge financial losses to the Government Treasury.

It is therefore, humbly requested that on the acceptance of this application under section 12 (2) CPC 1908 the Judgment dated 19-11-2022 of this Honorable Tribunal in the titled cases may kindly be set-aside in favor of the Applicants/E&SE Department in the interest of justice please.

Dated: <u>201 6</u>/2022.

APPLICANTS/ DIRECTOR Elementary& Secondary Education Khyber Pakhtunkhwa Peshawar. 4

### BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Application No: \_\_\_\_\_/2022 in Service Appeal No.6608/2021

#### VERSUS

Abdul Hameed PHST District Haripur.....Respondent

### AFFIDAVIT

**I, Dr. Hayat Khan Assistant Director (Litigation-II)** E&SE Department Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant Application under 12(2) CPC 1908 against the Judgment dated **0**9-11-2022 of this Honorable Service Tribunal in the titled Service Appeal are true & correct to the best of my knowledge & belief.

Depenent

andB	Promotion of SS1 01 Distance	
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A DIMECTOR AN	EMENTARY AND SECONDARY	:
The production of the second s	PAKHTUN KHAWA PESHAWAN	
	NG OF DEPARTMENTAL PROMOTION	
MINUTES OF TI COMMITTEE H	TI 2010 AT 10.30 AM IN OFFICE OF	
DIRECTOR NET	ER PAKHTUN KHWA PESHAWAR	
	tal Promotion Committee was held on 11-11-2019 at 10:30 AM	

under the Chairmanship of Director Elementary & Secondary Education Khybe discuss the promotion cases of SCT/CT, SDM/DM, SAT/AT, STT/TT, S.Qari and PSHT/SPST/PST (Male) to the posts of SST (G), SST(B/C) and SST (P/M) of the Elementary & Secondary Education Department. The following attended the meeting:

L. Hafiz Dr.Muhammad Ibrahim

Director,

- Elementary & Secondary Education, Khyber Pakhtunkhwa

### 2. Deputy Secretary/SO(S/Male)

Elementary & Secondary Education, Khyber Pakhtunkhwa

3. Fazli Wahid Deputy Director, Elementary & Secondary Education. Khyber Pakhtunkhwa

4 Umar Khan Kundi

District Education Officer (Male), Haripur.

The meeting started with recitation from the Holy Quran. The Chair welcomed the participants. The following items were considered by the DPC and the decisions recorded are reflected against each item:

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### PROMOTION TO SST (G)

ITEM No.1. PROMOTION OF SCT (BPS-16) MALE TO THE POST OF SST (G) BPS-16 ON f promotion of SCT (BPS-16) to SST (G) BPS-16 was considered and the DPC recommended as **REGULAR BASIS** 

The case of promotion of	
under:	38
Iotal No.of Vacant Post of SST (G)	10
25% Initial Recruitment Quota	28
75% Promotion Quota	15.2
row chara of Promotion Quota of SCI	10
Proposed SCT for Promotion to SST (G)	2
Proposed set to:	

S# Sn Name of # Official 1 119 Shafiq-ur- Rehman	Name of School GHS Tofkian	Birth	Date of Apptt: as Regular CT 8.11.1994	B.A,	Remarks Considered suitable for Promotion to the post of SST (G) in BPS-16 on regular basis with immediate effect
					effect

### In Chair

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### **PROMOTION OF PSHT** (BPS-15) MALE TO THE POST OF SST BPS-16 ON REGULAR BASIS

The case of promotion of PSHT (BPS-15) Male to SST (G) BPS-16 was considered and the DPC recommended

Tetzi ko.of Vacant Post of SST (G)	38	
25% Initial Recruitment Quota	10	
75% Promotion Quota 🔪	28	
20% Share of Promotion Quota of PSHT	7.6	
Proposed PSHT for Promotion to SST (G)	6	

S#	Sn #	Name of Official	Name of School	Date of Birth	Date of Appt: as Regular PST	Qual:	Remarks
1	160	Shafaqat	GPS Hattar	01.04.1964	17.9.1988	B.A,PTC, B.Ed	<b>Considered</b> for Promotion to the post of SST (G) in BPS-16 on Regular Basis with immediate effect.
5	219	Sarfaraz	GPS Ghulam Abad	17.01.1968	10.301990	B.A,PTC, B.Ed	<b>Considered</b> for Promotion to the post of SST (G) in BPS-16 on Regular Basis with immediate effect.
3	224	Muhammad Saleem	GPS Sumbal Neigar	22.03.1965	11.3.1990	B.A,PTC, B.Ed	Considered for Promotion to the post of SST (G) in BPS-16 on Regular Basis with immediate effect.
4	233	Naveed Akhtar	GPS Bajida	01.04.1969	12.3.1990	B.A,PTC, B.Ed	<b>Considered</b> for Promotion to the post of SST (G) in BPS-16 on Regular Basis with immediate effect.
5	258	Aslam	GPS Bilah	22.3.1965	10.12.1990	M.A,PTC, B.Ed	<b>Considered</b> for Promotion to the post of SST (G) in BPS-16 on Regular Basis with immediate effect.
6	267	Quraish Khan	GPS Degrah	03.02.1970	14.3.1991	M.A,PTC, B.Ed	Considered for Promotion to the post of SST (G) in BPS-16 on Regular Basis with immediate effect.

### B. <u>PROMOTION TO SST (P/M)</u>

25.0

ITEM No.1. PROMOTION OF SCT/CT MALE TO THE POST OF SST (P/M) BPS-16 ON REGULAR BASIS

The case of promotion of SCT/CT to SST (P/M) BPS-16 was considered and the DPC recommended as under:

Total No.of Vacant Post of SST (P/M)	11
25% Initial Recruitment Quota	3
75% Promotion Quota	8
40% Share of Promotion Quota of SCT	4.4
Proposed SCT for Promotion to SST (P/M)	4

S#	Sn # <sup>-</sup>	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular CT	Qual:	Remarks
1	21	Bahadar Sher Khan	GCMHSS No.1 Haripur	13.9.1970	31.8.1997	BSc,MA, (PS),M.Ed,	Considered suitable for Promotion to the post of SST (P/M) in BPS-16 on regular basis with immediate effect
2	162	Mehboob Shah	GHS Ghazi	1.4.1983	9.1.2012	MSc, B.Ed	<b>Considered</b> suitable for Promotion to the post of SST (P/M) in BPS-16 on regular basis with immediate effect
3	181	Yaseer Changaz	GHS Dartian	11.6.1985	6.11.2014	MSc, M.Ed	<b>Considered</b> suitable for Promotion to the post of SST (P/M) in BPS-16 on regular basis with immediate effect

### Promotion of SST of District Haripur

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**PROMINION OF SDM/DM MALE TO THE POST OF SST (P/M) BPS-16 ON BECH AD BASIS** 

e case. If providen of SDM/DM to SST (P/M) BPS-16 was considered and the DPC recommended as under:

fotal No.of March (Past of SST (P/M)	11
, 25% initial monante ent Quota	3
75% Provedime Club a	8
4% Strate of Promotion Quota of SDM/DM	1
Frequent SDM/DM for Promotion to SST (P/M)	. 1

9	5m #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular DM	Qual:	Remarks
-	. 145	Muhammad Zubair	GMS Garhan	10.3.1981	5.11.2014	B.Sc (P/M)	<b>Considered</b> suitable for Promotion to the post of SST (P/M) in BPS-16 on <b>regular</b> basis with immediate effect

### ITEM No.3 PROMOTION OF PSHT/SPST/PST MALE TO THE POST OF SST (P/M) BPS-16 ON REGULAR BASIS

The case of promotion of PSHT/SPST/PST to SST (P/M) BPS-16 was considered and the DPC recommended as under:

Fotal No.of Vacant Post of SST (P/M)	11
25% Initial Recruitment Quota	3
75% Promotion Quota	8
20% Share of Promotion Quota of PSHT/SPST/PST	2
Proposed PSHT/SPST/PST for Promotion to SST (P/M)	1

S#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular PST	Qual:	Remarks
1	477	Khaliq-uz- Zaman	GPS Pir Colony	19.4.1987	28.3.2012	BSc (P/M) B.Ed	<b>Considered</b> suitable for Promotion to the post of SST (P/M) in BPS-16 on <b>regular</b> basis with immediate effect
2	501	Waqar Ahmad	GPS Bandi Guloo	31.3.1987	5.1.2014	BSc (P/M) B.Ed	Not considered for Promotion to the post of SST (P/M) in BPS-16, being not eligible on account of less service than 7-years

The meeting ended with a vote of thanks to and from the Chair.

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Umar Khan Kundi District Education Officer (Male) Haripur.

Deputy Secretary/SO(S/Male) Elementary & Secondary Education Khyber Pakhtunkhwa

Fazli Wahid

Deputy Director Elementary & Secondary Education Khyber Pakhtunkhwa

Hafiz Dr.Muhammad Ibrahim

Director Elementary & Secondary Education Khyber Pakhtunkhwa

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1 <b>1</b>					Hethud of Roc	of Vacant SST	(G) Posts	- 5114 10 551 ((	5) BPS-16 38	ł,					
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			Gen: Teacher Name Seniorit	Father Name BP	S School Name				06				• •	7.	
			y No.		School Name	Date of Birth		Data of D						- ·	
			1				Appointment	Appointment	ar DATE OF as promotion to	Acadimic	i i viessiona.	Whether	· · · ·		
			160 SHAFAQAT	JHENDAD 18		· ·		PST	present grade	Qualficatio	on Qualification	Eligible for			
		12	240	Muhammad 19	GPS HATTAR	01-04-1964	14-09-1988	1				Promotion	Remarks	1	
		21		Sadiq 15		1		17-09-1988	20-03-2014	BA	BIC/CICIE ID ST		1	1	
		-3	Muhammad 224 Saleem		GPS Sumbal	17-01-1968	08-03-1990	10-03-1990	20-03-2013	1.H.	PTC/CT/B.Ed	Tes	Recemme	De Q	
			233 Naveed Akhtar	Roshan Din 15	Neigar	22-03-1965	09.02.000	4	20-03-2013	BA	PTC/B.Ed	Tes			
		5	258 Aslam		GPS Bajeeda	01-04-1969	08-03-1990 08-03-1990	11-03-1990	20-03-2013	BA	BE		Recomme	le l'	
		i 6 / 2		noul Qadir 15	Gps Bilah	20.00	10-12-1990	12-03-1990	20-03-2013	BA	PIC/CT	Yes	Recomment	a.Q	
			67 Quraish Khan	Hikmat Khan	Gps Degrah	1		10-12-1990	20-03-2013	MA	PTC, B.Ed PTC/B.Ed	<u> </u>	R2 COMMON	<i>I</i>	
		) Certifi	cate:-		ops Degran	03-02-1970	22-02-1988	14-03-1991	20.02.02		110/8.60		Recomme	malia	
-		2 Hold due	fied that all the PSHT	included in the panel for and none of them is ho				Δ.	the second se	MA	PTC/CT/B.Ed	Ties	Recomment		
		3. Have can	posts on regular basis	and none of them is ho	or the Promoti	on of PSHT BH	S-15 to SST RI	KLCO	mmenolod	from	SND.01	J. 'C		the	
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									PSHT NOV G	1		Tu	ly .		•
		5. Neither ar	w disciplinary/ depart	o any organization under mental proceedings/ An st stan leave om adverse removie	r the Federali	Provincial A.	10		1.011.01.9-13	10			mo	-7	
		upon any on	e of them during the la.	st	ti corruption/	iudicial enauir	uonomous/Sen	ni autonomous/	International ()	rumizar			altra -	0	
		7. Their ACD	on long leave/ Ex-Paki	stan leave		· · · · ·	, is penaing ag	gainst them nor i	has any penalty	heen impos	ed and	9	NV ·	AN	
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		9. The Samian	i i i i i i i i i i i i i i i i i i i						•		1		N		And
		10. The Depar	Imental Promotion Co	5 officials is final, und mmittee is requested to	sputed and no	t subinding							·	0 10	) prod
		BPS-16 with i	mmediate effect.	minitiee is requested to	determine the	suitability of i	he also pass				ŧ			DRotm	
				5 officials is final, undi mmittee is requested to			ne above PSH7	for Promotion	of PSHT BPS.	156 1000	- -		/		
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Check List for Departmental Promotion Committee for the Promation of PSHT B-15 to SST (G)B-16

S.No	Seniorty No	Name	Father Name	School Name	Bio Data	ACRs	Synopises	Non Involveme nt Certificat e	3 Years Result	Service book	Last pay Print
1	• 160	SHAFAQAT	JHENDAD	GPS HATTAR	r.			~			
 Y		Sarfraz	Muhammad Sadiq	GPS Ghulam Abad	~		1,81	~			
2	219	Muhammad	Roshan Din	GPS Sumbal Neigar	~	~		~	~	~	
3	224	Saleem Naveed Akhtar	Muhammad Yousaf	GPS Bajeeda			V		×		
	233	Muhammad Aslam	Abdul Qadir	Gps Bilah	V						
6	267	Quraish Khan	Hikmat Khan	Gps Degrah	V	M					Y F

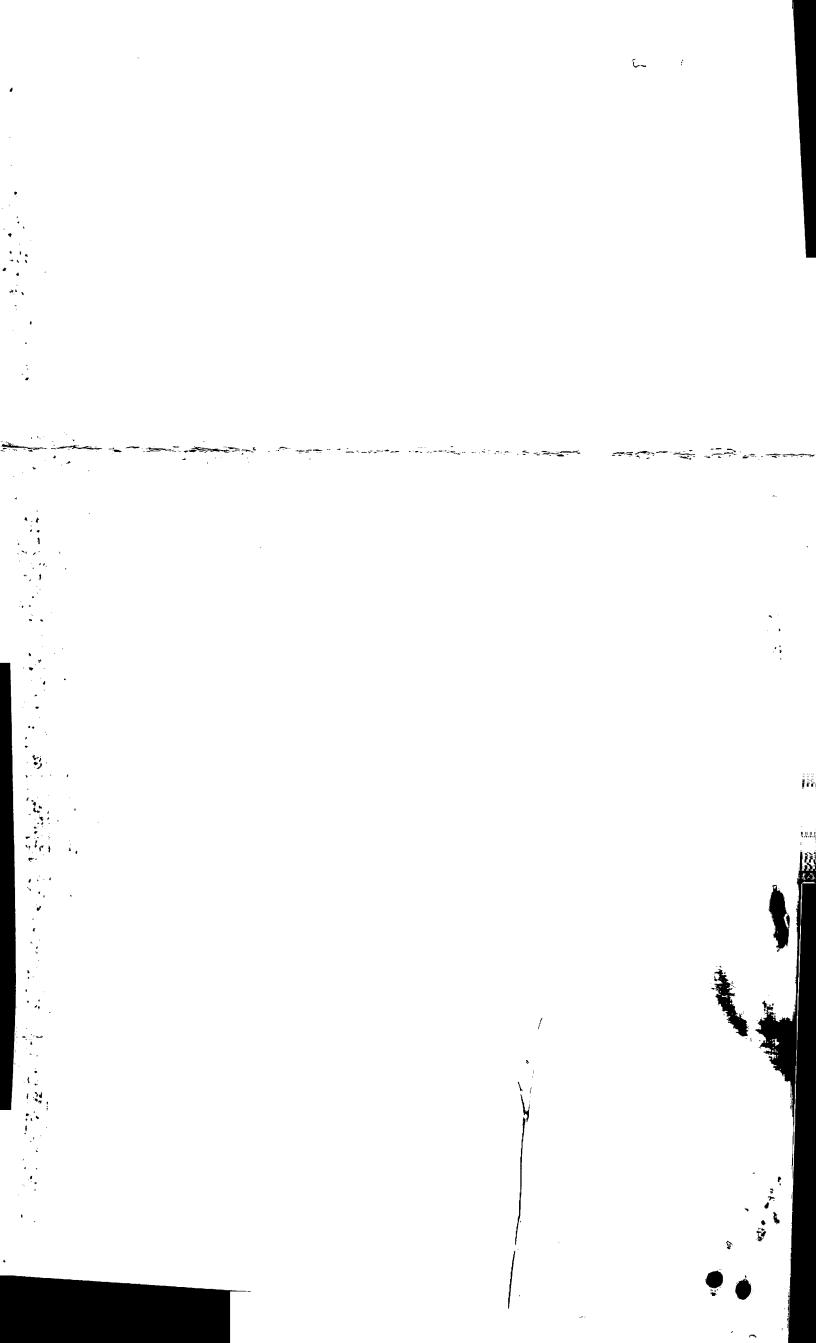
SNO. OI to OL Recommende DBO CM Ard

# OINCE OF THE SUB DIVISIONAL EDUCATION OFFICER (MALE) HARIPUR.

(, Seniority List of PSHT B-15 (Primary School Head Teachers) (M) District Haring

11-

	14 ·	11.024	10.22.355			<u>Licuu icaci</u>	ters) (M) Dis	driel II	aripur as s	tood on a lie	O / NAVEL	
	. 1	Teacher Name	Father Name	School Name	DOB	Date of Fir	st. Date of			<u></u>	<u>8/2019</u>	
1	GCB1	1 Cachorate	• •		54.90 H	Appointme			Professi	onal DATE O	E.E. Martin	
•	emority		•				PST	On.		ation APPOINTN	MEN St. Date of	-
	No.		e fa Art - Art Madea and Art				A State of the second	Lati		TAS REGU	LAR promotion	Remarks
		1.200.00	Hazir Din	GPS Janjakka	28-06-1957	10-01-197(			1.00	Star PST-	8/2010 MEN X Date of LAR Promotion 1.2 Jon presen	
	1	Awasi	ΜΛΚΙΙΛΝ ΚΗΑΝ	GPS BANDI GULLOO	14-10-1957			6 1,	PTC/C	Г 10-09-197	76 20 co	
	2	YOUSAF	KHAN BAHADAR	GPS GHRA GEHRAIN	12-03-1961	23-08-1976		5 1 1./			20-03-2013	Retired
	.3	RIASAT KHAN	-Muhammad Din	Chhitri	15-03-1959	20-10-1979			PTC/CT	22-10-197		Retired
		Khan	Abdul Raheem	GPS Mohra Mumdoo	29/04/1962	01-10-1980			PTC/CT		20-03-2013	
	5	Siddique	Rehmat Din	GPS Sarai Saleh	03-03-1959			LIA				
•	6	MIJHAMMAD TARIQ	ABDUL Raheman	GPS RARRA		14-09-1981		IFA	РТС	01-10-198		Retired
	7	FAREED KHAN	KHAN	GPS PANIAN NO.1	10-02-1960	14-09-1981		11A	PTC/CT	01-10-198		Retired
	8	Khan	Khan	GPS NA Gar	15-06-1963	26-09-1982		Į Į FA	PTC/CT	02-10-1982		Retired
	2	AKRAM	ASLAM	GPS NADIR ABAD	20-12-1963	26-09-1982	02-10-1982	ΤΛ	PTC			Retired
	10		Khan		01-04-1964	26-09-1982	02-10-1982	ŀΛ	PTC	.02-10-1982	2003-2013	Retired
	11	Saif Ullah Khan	Haider Zaman	Maira Ali Khan	04-10-1964	26-09-1982	02-10-1982	ŀΆ	PTC/CT	02-10-1982		
	12	Sharakat		GMPS Kotehra	14-01-1958	26-09-1983	01-10-1983	- Ea	PTC/CT	02-10-1982		
	13	Muhammad Daud	Muhammad farooq	GPS Tarnava	21-01-1959	24-12-1979	25-12-1979	ВА	PTC/CT	01-10-1983	20-03-2013	Retired
	14	Khalid Mehmood	Abdur Rasheed	Nikkah Pah	20-05-1959	14-09-1981	17-09-1981	I'A	PTC/CT	01-10-1983	20-03-2013	
	15	AKHTAR	KARAM ELAHI	GPS DOYIAN KHUSHKI	07-01-1960	18-05-1980	19-05-1980	FÅ	1	01-10-1983	20-03-2013	Retired
	16	Nawaz	Muhammad Akbar	GPS Mohra Ghazan	10-03-1960	26-09-1983	01-10-1983	I'A	PTC	01-10-1983	20-03-2013	Retired
	17	Wazir Muhammad	Mir Muhammad	GPS Dhamkhar Colony	03-05-1962	23-12-1981	27-12-1981	FA	PTC	01-10-1983	20-03-2013	
	18	Firdus Khan	Aslam Khan	GPS Bhoora Banda	15-12-1962	17-10-1981	19-10-1981	FA	PTC	01-10-1983	20-03-2013	
	19	GHULAM FAROOQ		GPS DEHDAN	10-01-1964	26-09-1983	01-10-1983		PTC/CT	01-10-1983	20-03-2013	
	20	Atta u Rehman	Rehman	GPS SHADI	01-01-1965	01-10-1983	01-10-1983	I'A'	PTC/CT	01-10-1983	20-03-2013	Retired
	21	Muhammad Zahir	Ghulam Ghoos	GPS Kallinger No1	02-01-1960	02-04-1980	12-04-1980	FAI	PTC/CT	01-10-1983	20-03-2013	Reurea
	22	Khani Sultan	Muhammad	GPS Tofkian	01-12-1960	23-10-1978	25-10-1978	FA	PTC	26-06-1984	20-03-2013	
	23	Ibrar Hussain Shah	n Qudrat Shah	Gps Dheri	20-04-1961	20-10-1981	20-10-1978	FA	PTC/CT	26-06-1984	20-03-2013	Retired
	24	Siddique	Abdul Aziz	GPS No.2 Khanpur	01-05-1961	23-10-1978	24-10-1981	FA	PTC	26-06-1984	20-03-2013	
	25	Saghir Ahmed	Sher Ahmed Khan	GPS Sarai Saleh	04-04-1958	12-12-1982	14-12-1982	FA'	PTC	26-06-1984	20-03-2013	Retired
	23	Bakhsheesh Ali	Muhammad Younus	Gps Hassan Pur	21-12-1959	02-11-1982		FA	PTC	10-09-1984	20-03-2013	
•	27	Khalil ur Rehman		Maira Toot	01-10-1961	.30-08-1984	04-11-1982	FA 🝴 .	PTC/CT	10-09-1984	20-03-2013	Retired
~. •••	21		mit Whit ammad Khan	GPS Shahw(uhammad	CH C1 1000		01-09-1984 16:01-09,1984	FA/	PTC	10-09-1984	20-03-2013	, Retired.
<u>, , , , , , , , , , , , , , , , , , , </u>			CIAN LITEN NETTENNE	COC VANODA UNITACI		100 100 100 (in)	10.01-09,1984,	FA AL	PTC.	10.00	20 50 51	Retired
· • • • •								5 ··· 4 F		12.22.122.1	20-03-2013	Retired



	C ( 310)	an ann ba data da sangara da anta data a				•	12		1 4200 J 18 -	·n + · •	· . •		·····
		TeacherName	Father Name *	School Name	DOB	Date of Fir	st Date of					·	
	0.8	ř				Appointme	nt Appointment :	- y Acan 45i - 4	n Professi	onal DATEC	DF 1 To		• ••,
	5.				1		PST ST	Quali		atio APPOINTI	MEN Date of	GH	Í
1111	1.2		<u>.</u>					ation	· · · ·	A LAS REGU	LAR promotio	n k Remarks nt	
	(810)	Akhtar Nawaz	Muhammad Yousaf	GPS Khaka	12-02-1971		19-11-1990	4-1-1			a faile grade	nt - Alexandre	-
	.381	Muhammad Afzal	Aziz ur Rehman	GPS Kand Kalo Khar	n 01-03-1971	28-04-1993	29-04-1993	IIA 	PTC	29-04-19	20-03-201	2	
	382	Muhammad Bashir	Nawab Khan	GPS Goraki Maira	20-12-1971	02-12-1989	03-12-1989	1 IA	PTC	29-04-199	20-03-201		<u> </u>
	383	Mushtaq Khan	Sikander Khan	GPS Laban Bandi No	2 20-05-1961			16 BA	РТС	29-04-199	3 20-03-201		<u> </u>
	384	Mustajir Shah	Mozammal Shah	GPS Gallai	04-02-1967	17-11-1990		FA	PTC	07-09-199	3 20-03-201		
	385	Siddique	Ghulam Hussain	Shah Maqsood	29-03-1968	08-11-1989	. 19-11-1989	MA	PTC/CT	07-09-199	3 20-03-2013	noured	
	386	Tahir Hussain Shah	Iqbal Hussain Shah		05-04-1968		· 14-10-1989	NFA	PTC	07-09-199	3 20-03-2013		
	387	Javed Iqbal	Abdul Hameed	GPS Darwesh No-1	02-02-1969	23-11-1989	07-12-1989	1 BA	PTC	07-09-1993		Retired	
	388	Abdul Waheed	Allah Baksh	Phulla Galli	15-04-1970	26-12-1989	27-12-1989	НА	PTC/CT	07-09-1993		+	
	389	Muhammad Ayub	Muhammad Zakri	GPS Narota	31-12-1970	23-11-1989		BA	РТС	07-09-1993	20-03-2013	Promoted CT	
	390	Khan	Musa Khan	GPS chak Mohri	05-02-1971	08-11-1989	01-12-1989	(FA	PTC/CT	07-09-1993	20-03-2013	·····	
	391	Muhammad Sulman	Gul Zaman	GPS Kacchi	20/08/1970	08-11-1989	11-11-1989	I'A	PTC/CT	07-09-1993	20 03-2013		
	392	Muhammad Ilyas	Gohar Rehman	GPS Dharam Pani	10-02-1968	30-12-1989	20-11-1989	Ŗν	PTC/CT	17-09-1993	20-03-2013		
	393	Muhammad Arif	Jan Muhammad	GPS Paswal	13/05/1968	08-06-1993	31-12-1989	ŖΛ	PTC/B.Ed	25-12-1993	20-03-2013		
	394	Khan	Khan	Phulla Galli	15-04-1971	08-11-1989	09-06-1993	ΒΛ	РТС/СТ	25-12-1993	20-03-2013	Retired	
	395	Hafeez Ahmed	Abdul Rauf	GPS Mohra Mumdoo	01-03-1965	11-12-1989	12-11-1989	BA	PTC/B.Ed	25-12-1993	20-03-2013		]
	396	Shahmim Akhtar	Muhammad Ashraf	GPS Bagla	01-01-1969	12-11-1989	12-12-1989	BA	PTC/CT	05-03-1994	20-03-2013	Retired	]
	397	Shafiq Ur Rehman	Aziz ur Rehman	GPS Ghulam Abad	12-07-1970	08-11-1989	18-11-1989	FΛ	РТС	05-03-1994	20-03-2013	Promoted CT	]
	398	Khan	Khan	GPS Sumbal Mohri	07-08-1970	08-11-1989	15-11-1989	FÅ	РТС	05-03-1994	20-03-2013		]
	399	Basharat Khan	Aurangzaib Khan	GPS Gatyan Da Dara	16-06-1971	08-11-1989	14 44 484		PTC/B.Ed	05-03-1994	20-03-2013	Retired	
	400	Amjad Ali	Muhammad Khan	GPS Karaplian	04-04-1968	08-11-1989	16 44	BA.	РТС	05-03-1994	20-03-2013		
	401	Muhammad Saeed	Siddique	GPS Nartopa	16-04-1962	08-11-1989	10	FA	РТС	02-05-1994	20-03-2013		
	402	Muhammad Saleem	🔆 Roshan Din	Thanda Choa	15-01-1963	08-11-1989	A CONTRACTOR OF A CONTRACTOR O		РТС/СТ	29-05-1994	20-03-2013		
	403	Fakhar e Alam Mir	Mir Alam	Baldher	03-12-1964	09-03-1983		FA L	PTC	20 0 - 1 - 11 - 11	20-03-2013	Retired	
	404	Sabir Zaman	Muhammad Aslam	GPS Bandi Mian Pirdad	05-01-1966	02-10-1989			РТС/СТ	29-05-1994	20-03-2013	and the second	
	405	Muhammad Rafique	Sardar Muhammad	GPS Kariplian		16-10-1989	10-10-1989	BAI, F	ТС/СТ	29-05-1994	20-03-2013	Retired	
	(406)	Abdul Hameed	- Muhammad Khan	Chack Mohri	100 m 100	Mr. Bar P Cart mer bar a	23-10-1989	A P	TC/CT	20.05.1001	20-03-2013	Retired	
V	407	Muhammad Usman	Muhammad Abdus	GPS Ali Khan		24-11-1986	16:02-1988	1A I, / PT	C/B Ed	. in the second s	20-03-2013		
	408	ASHRAF	BOSTAN KHAN	GPS GAL HAM	00.10.10.17	00.11.1000			Date	20.05 100	20-03-2013		
	409	Shah	Yaqoob Ali Shah	GPS Kohala Bala	14 02 1000	20 41	13-11-1989 F	A	DTC	20.05.1	20-03-2013	Retired	
	410 .	Muhammad Akhtar	Muhammad Safdar	Gujar Dharrian	22.00	00 44 46-4	04-12-1989 F	A	DTC I	20.05.1	20-03-2013		
	411	Shabeer Hussain	Muhammad Sarwar	GPS Karrach	19/03/1968	21110 7000 1	11-11-1989 F	4' J		20 05 100	20-03-2013		
11 - 12	412	AFSAR KHAN .	H- AYOUB KHAN	GPS NADIR APADA	02-05-1968.	08-11 1000	01-01-1990 B		A(Pak)	29-05-1994	20-03-2013	Retired	•
المراجعة ال المراجعة المراجعة الم		র যা হারের জারের হার আনহার হারের জার হার হার হার হার হার হার হার হার হার হ		GPS NADIR ARAD		業時間消費	141-1990	ja -	TC y this		20-03-2013	A	:
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1411.Date of First Appointment asDate of First Appointment asDate of Appointment as icDate of colorsional (unit)DATE OF (unlic)Date of Appointment asHort NawazMuhammad ZarinGPS Hattar01-02-197431-08-200601-09-2006MAd01-09-200622-03-2019Faisal KhanSher Afzai KhanGPS Hattar01-01-197531-08-200601-09-2006FAPTC01-09-200622-03-2019HuRehmanMuhammad AfzaiGPS Jabbar Parhari02-02-197531-08-200601-09-2006BAPTC/CT01-09-200622-03-2019K79Ageel AnwarAnwar KhanGPS Hill Ghumawan28-01-197631-08-200601-09-2006BAPTC/CT01-09-200622-03-20196H0SADAQAT SHAHSADIQ SHAHGPS PANDORI KOKLIA01-02-197631-08-200601-09-2006BAPTC/CT01-09-200622-03-20196H1Babu IsmailMalik BanarisGPS Pind Kanal Khan06-04-197631-08-200601-09-2006MAPTC/CT01-09-200622-03-20196H1Babu IsmailMalik BanarisGPS Pind Kanal Khan06-04-197631-08-200601-09-2006MAPTC/CT01-09-200622-03-20196H2Muhammad AsifMuhammad SafarGPS Mohra20-05-197631-08-200601-09-2006MAPTC/CT01-09-200622-03-20196H3Muhamad AsifAbdul QayumGPS Banda Mansehrean07-07-196908-11-198911-11-1989(Ed)PTC/CT	1
Fuisal Khan         Sher Afzai Khan         GPS Bandi Sher Khan         10-01-1974         31-08-2006         01-09-2006         MA         d         01-09-2006         22-03-2019           Rehman         Muhammad Afzai         GPS Jabbar Parhari         02-02-1975         31-08-2006         01-09-2006         FA         PTC         01-09-2006         22-03-2019           Rehman         Ghulam Sawar         GPS Jabbar Parhari         02-02-1975         31-08-2006         01-09-2006         FA         PTC         01-09-2006         22-03-2019           Rehman         Ghulam Sawar         GPS Jabbar Parhari         02-02-1975         31-08-2006         01-09-2006         FA         PTC         01-09-2006         22-03-2019           Rehman         Ghulam Sawar         GPS Dheri Sikandar Pur         10-04-1975         31-08-2006         01-09-2006         MA         PTC/CT         01-09-2006         22-03-2019           GHU         SADAQAT SHAH         SADIQ SHAH         GPS PANDORI KOKLIA         01-02-1976         31-08-2006         01-09-2006         MA         PTC/CT         01-09-2006         22-03-2019           GR1         Babu Ismail         Malik Banaris         GPS Pind Kamal Khan         06-04-1976         31-08-2006         01-09-2006         MA         PTC/CT	Remark
Parkar Kitan         Sher Alza: Khan         GPS Bandi Sher Khan         10-01-1975         31-08-2006         01-09-2006         FA         PTC         01-09-2006         22-03-2019           Rehman         Muhammad Afzal         GPS Jabbar Parhari         02-02-1975         31-08-2006         01-09-2006         BA         PTC/CT         01-09-2006         22-03-2019           Kr/1         Babar Rehman         Ghulam Sawar         GPS Dheri Sikandar Pur         10-04-1975         31-08-2006         01-09-2006         BA         PTC/CT         01-09-2006         22-03-2019           Kr/1         Aqeel Anwar         Anwar Khan         GPS Dheri Sikandar Pur         10-04-1975         31-08-2006         01-09-2006         BA         PTC/CT         01-09-2006         22-03-2019           Kr/1         Aqeel Anwar         Anwar Khan         GPS PANDORI KOKLIA         01-02-1976         31-08-2006         01-09-2006         BA         PTC/CT         01-09-2006         22-03-2019           GR1         Babu Ismail         Malik Banaris         GPS Pind Kamal Khan         06-04-1976         31-08-2006         01-09-2006         MA         PTC/CT         01-09-2006         22-03-2019           682         Muhammad Asif         Muhammad Safdar         GPS Mohra         20-05-1976         31	
And Main Main Mark         Main Main Mark         Main Mark         Mark         Of-9/2006         22-03-2019         22-	
Aqeel Anwar         Anwar Khan         GPS Hill Ghumawan         28-01-1976         31-08-2006         01-09-2006         MA         PTC/CT         01-09-2006         22-03-2019           680         SADAQAT SHAH         SADIQ SHAH         GPS PANDORI KOKLIA         01-02-1976         31-08-2006         01-09-2006         BA         PTC         01-09-2006         22-03-2019           681         Babu Ismail         Malik Banaris         GPS Pind Kamal Khan         06-04-1976         31-08-2006         01-09-2006         MA         PTC/CT         01-09-2006         22-03-2019           682         Muhammad Asif         Muhammad Safdar         GPS Mohra         20-05-1976         31-08-2006         01-09-2006         MA         PTC/CT         01-09-2006         22-03-2019           683         Mushtaq Ahmed         Abdul Qayum         GPS Banda Mansehrean         07-07-1969         08-11-1989         11-11-1989         (Ed)         BTC/CT         01-09-2006         22-03-2019	
Kdc         J	
681         Babu Ismail         Malik Banaris         GPS Pind Kamal Khan         06-04-1976         31-08-2006         01-09-2006         MA         PTC/CT         01-09-2006         22-03-2019           682         Muhammad Asif         Muhammad Safdar         GPS Mohra         20-05-1976         31-08-2006         01-09-2006         MA         PTC/CT         01-09-2006         22-03-2019           683         Mushtaq Ahmed         Abdul Qayum         GPS Banda Mansehrean         07-07-1969         08-11-1989         (Ed)         PTC/CT         01-09-2006         22-03-2019	·
682         Muhammad Asif         Muhammad Safdar         GPS Mohra         20-05-1976         31-08-2006         01-09-2006         MA         PTC/CT         01-09-2006         22-03-2019           683         Mushtaq Ahmed         Abdul Qayum         GPS Banda Mansehrean         07-07-1969         08-11-1989         11-11-1989         (Ed)         PTC/CT         01-09-2006         22-03-2019	
683         Mushtaq Ahmed         Abdul Qayum         GPS Banda Mansehrean         07-07-1969         08-11-1989         01-05-2006         MA         PTC/B.Ed         01-09-2006         22-03-2019	
684 Ishtiaq Aziz Aziz ur kenman GPS Noor Pur 10-06-1972 20-10-1994 22-10-1994 11/11/1989 22-03-2019	
685         Shaukat Nawaz         Muhammad Saleem         Muhammad         22-04-1969         10-04-2000         14-04-2000         FA         PTC         14-04-2000         04-10-2019	

Sub Divisional Education Officer (M) Haripur

#### Office of the District Education Officer (Male)Haripur Working Paper for Department Promotion Committee for the Promotion of PSHT to SST (M/P) BPS-16 38 Total No. of Vacant SST (G) Posts-10 Method of Recruitment 25% by intial recuritement 6. PSIIT 20 Flare 6 availetti by Prinstion Posts 75% by Promotion . 46 200 Annihon 026 No Y. 12. 2.2.2. 77 2.4 Date of 1st Date of Whether Acad: appointment in regular Date of Prof: **BA** with Present Place of Eligible for Remarks Ovalificat Name of Official S. No. S.L No. against presen Birth Education Qual Division Posting Ip-Gradation ion Post Department Dir nit Portin GMP5 Thiper Eligible 2nd Div Defenned 01-04-1964 16-05-1985 31-01-1989 PTC/B.Ed Muhammad Ikram Rajdhani MA $\gamma_{1}$ 137 . . . . Eligible 2nd Div Reconingendel 07/04/19963 21-11-1985 PTC/8.Ed 06-05-1961 Daud Shah GPS Boketar MA 154 GPS Bzyian 07-04-1993 Eligible 07-11-1987 PTC/CT/B.ed 2nd Div 15-02-1963 ΒA Reconstructe Jamil Khan 3 218 Ahmed Ali Khan Eligible Dect NA+ Provided Deferred 02-04-1992 14-01-1988 2nd Div 30-09-1967 PTC/CT/B.ed Saghir Ahmad GPS Dars dartian ΒA $(\mathbf{a})$ 230 Relemmende 07-04-1993 Eligible 01-01-1968 14-01-1988 2nd Div MA CT/M.ed 231 ligbal Hussain GPS Kundi Recommended. 12-03-1967 | 16-02-1988 | 29-05-1994 Eligible Ist Div PTC/ B.Ed GPS Gheba MA 237 Abdyl Hameed 6 Sin al 2 cl. Recommended for fromition. except

#### Certificate:-

1. It is certified that all the PSHT (Male) included in the panel for the Promotion of PSHT &PS-15 to SST (Sc) BPS-16.

2. Hold the posts on regular basis and none of them is holding the post on adhoci acting charge busis contract.

3. Have completed the required minimum length of qualifying service and qualifications as required for Promotion of PSHT BPS-15 to SST BPS-16 under the Rules.

Kone of them is an deputation to any organization under the Federal? Provincial? Autonomous: Semi autonomous? International Organizations.
 Neither any disciplinary: departmental proceedings? Anti corruption? judicial enquiry is pending against them nor has any penalty been imposed. Rec years.

upon any one of them during the last 6. No one is on long leave! Ex-Pokisten leave.

7. Their ACRs. Synopsis are free from acherse remarks.

8. They are all alive and serving.

9. The Seniority list of PSHT BPS-15 officials is final, undisputed and not subjudice.

.10. The Departmental Promation Committee is requested to determine the suitability of the above PSHTs for Promotion of PSHT BPS-15 to SST BPS-16 with instructure effect.

> District Education Officer (M) Haripur



DE0/(M) ATD.

**HEJSEGG** 

## \_\_\_ List of PSHT (Male) to SST (G)B-16 for Promotion of District Haripur

S. No	I Sen' Lictiva J	Utheral	Present Place of Posting	Bio Data	ACRs 5 Year	Synopsis	Non Inv: Certificate	Result 5 years	L.P. Slip	Certificats Degrees	
X	) 137 v	Muhammad Ikram	i GMPS Thiper Rajdhani	× Br	and ent	not p	middel	×	1×		Fale 70
. 2	154	Daud Shah	GPS Boketar			V			Ti	in a	sk.
3	218	12011111111111111	GPS Bayian Ahmed Ali Khan	~	~	$\checkmark$				1 ·	Ker .
(4)	230 K. S	Saghir Alumad	GPS Dara dartian	Docom	viz " no	1 Provid	1		<i>а</i> .	a File	The f Solins
5	231	gbal Hussain	GPS Kundi	V	V			· · /	· · · · ·		2
6	237 / A	bdul Hameed	GPS Gheba		~		X,	V		V oh	-{`

Recommended except. SNO. 01 + 04. 14