

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Civil Misc. Application # _____ /2022

Tribunal Appeal #916 of 2021

Abdur Rauf Niazi Ex-Senior Instructor/Lecturer Govt. College of
Technology Bannu S/o Shah Jahan Niazi R/o Village and Post Office
Ghoriwala Tehsil & District Bannu ~~~~~ (Appellant)

--- VERSUS ---

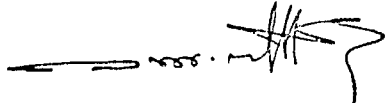
The Govt. of Khyber Pakhtunkhwa through Secretary Commerce,
Industry and Technical Education Khyber Pakhtunkhwa Peshawar &
others ~~~~~ (Respondents)

I N D E X

S#	Description of Documents	Annexure	Pages
1	CM and Affidavit		1-2
2	Better copy of Notification #SO-III(IND) 4-7	AX	3-5
3	Better copy of Notification #SO-III. IND: 4-11 dated 14/4/2018	BX	6-8

Dated: 28/11/2022


Appellant through counsel:


(ISRAR UL HAQ)
Advocate High Court Bannu

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

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The Govt. of Khyber Pakhtunkhwa through Secretary Commerce,
Industry and Technical Education Khyber Pakhtunkhwa Peshawar &
others ~~~~~ (Respondents)

SUBJECT: CIVIL MISCELLANEOUS APPLICATION.

PRAYER: ON ACCEPTANCE OF THE INSTANT APPLICATION, THIS
HON'BLE COURT MAY KINDLY BE PLEASED TO ORDER
THE ANNEXED DOCUMENTS TO BE MADE PART AND
PARCEL OF TRIBUNAL APPEAL #916 OF 2022, FOR JUST
DECISION OF THE CASE.

Respectfully Sheweth: -

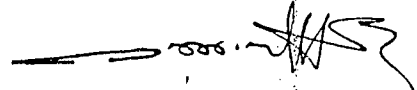
- 1- That, the appellant has instituted the above titled Tribunal Appeal before this Hon'ble Court which is still pending adjudication.
- 2- That, apart from all other documents which have already been submitted, the appellant wants to place on file the following additional documents for just decision of the case.

(1) Better copy of Notification #SO-III(IND) 4-7
(2) Better copy of Notification #SO-III. IND: 4-11

Therefore, it is very kindly requested that on acceptance of instant application, this Hon'ble Court may graciously be pleased to issue necessary directions in respect of placing on file the above stated document, just to meet the ends of justice.

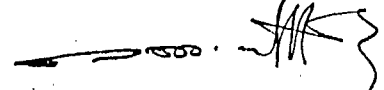
Dated: 28/11/2021


Appellant through counsel:


(ISRAR UL HAQ)
Advocate High Court Bannu

CERTIFICATE:

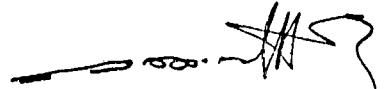
This is to certify that no such petition has been filed earlier before any other forum and that the assertions of this petition are true and correct.


(ISRAR UL HAQ)
Advocate High Court Bannu

AFFIDAVIT

I, do hereby solemnly affirm and declare that contents of instant application are true and correct to the best of my knowledge and belief and that nothing has been kept concealed from this Honourable Court.

Deponent:


(ISRAR UL HAQ)
Advocate High Court Bannu

AX

(3)

ANNEX-AX

KHYBER PAKHTUNKHWA TECHNICAL EDUCATION AND VOCATIONAL TRAINING AUTHORITY

In pursuance of the provisions of the Promotion and Transfer Act, 1973 read with the Seniority list of the incumbent employees of the Authority, the competent authority has been pleased to order issuance of Seniority list of the incumbent employees of the Authority (who had not opted to become TEVT A employees) as follows:

SENIORITY LIST OF INCUMBENT EMPLOYEES OF THE AUTHORITY IN THE POSTS OF SENIOR INSTRUCTOR/TRAINER/STAFF TRAINER (BPS-17) AS STOOD ON 31-12-2017.

Sl. No.	Name of Incumbent with academic qualification	Date of Birth with domicile	Date of Entry into Govt. service.	Regular Appointment/Promotion to the Present Post.			Present Appointment	Remarks
				Date	BPS	Method of recruitment		
1	2	3	4	5	6	7	8	9
1	Mr. Hawas Khan i. DAE (Electrical) ii. 06 months Inst: Trg: Course	02-08-1962 Mardan	05-05-1988	30-04-2008	17	By Up Gradation	Sr. Instructor	GTV(E Gulbah Peshawar)
2	Mr. Mohammad Iqbal i. DAE (Auto) ii. 06 months Inst: Trg: Course	15-07-1960 Mardan	07-05-1988	30-04-2008	17	By Up Gradation	-do-	GTV (B) T Bhai
3	Mr. Mehraban Khan, (Welding) i. 01 Year IPC ii. 06 Moths Inst: Trg: Cor	08-08-1959 D.I Khan	05-04-1980	30-04-2008	17	By Up Gradation	-do-	GTV(C) D.I.kha
4	Mr. Bahar Bakhsh (Electrical) i. 02 Years IPC ii. 06 Moths Inst: Trg: Cor	15-04-1958 Peshawar	10-08-1992	30-04-2008	17	By Up Gradation	-do-	GATTC H ad Peshawar

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Sl. No.	Name	Inst. Trg. Course	Year	Date of Birth	Date of Retirement	Age	By Up Gradation	Post	Office
5	Shakoor (Retired)	1958	02-07-1983	Mardan	30-04-2008	17	By Up Gradation	-do-	GTV(B) Gulbahar Peshawar
6	Gulbahar Hussain. (wood work), 10 Years TPC	1963	02-07-1983	Peshawar	30-04-2008	17	By Up Gradation	Staff Trainer	GTTTC, H/Abad Peshawar
7	Rehman (Auto), 06 Months TPC in Auto, G-II level TPC	1952	01-03-1985	Karak	30-04-2008	17	By Up Gradation	Sr. Instructor	GTV(B) Karak
8	Nasrullah Khan, (RAC) 12 Years TPC, 06 Months Inst: Trg Course DAE in (Electrical)	1960	12-02-1983	Peshawar	30-04-2008	17	By Up Gradation	Senior Instructor	GCT, Swabi
9	Abdur Rauf Niazi, (Auto) BA LLB 3 Years App: Ship: Cert. 16 Months Instt: Trg: Course Fasiullah (RTV)	1950	12-02-1983	Bannu	30-04-2008	17	By Up Gradation	-do-	GTV(B) Ghazni-Khel Lakki
10	12 Months Inst: Trg: Course 1 year Inst: Trg: Course Ahmad Gul (Bench Filter)	1962	12-02-1983	Mardan	30-04-2008	17	By Up Gradation	-do-	GTV(B) Mingora Swat
11	(History) 10 Years DAE 1 year Inst: Trg: Course	1963	12-02-1983	D.I.Khan	30-04-2008	17	By Up Gradation	Senior Instructor	GTV(B) D.I.khan

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01-07-1966 Peshawar	05-12-2017	17	Promotion	do	GTVC Gulbhar
09-11-1963 Lakki Mannu	05-12-2017	17	Promotion	do	GTVC D.I.Khan
19-01-1951 Swabi	05-12-2017	17	Promotion	do	GTVC Gulbhar
09-12-1967 Lakki Mannu	05-12-2017	17	Promotion	do	GTL, Saad Kurrum Ageri GCT, Kohat
09-12-1967 Peshawar	05-12-2017	17	Promotion	GTVC(B), Karak	GCT, Bannu
08-12-1962 Bannu	05-12-2017	17	Promotion	GTVC, Peshawar	GTVC, (B) Gulbhar Pesh

15-08-

100

Directorial (MNH/HR)

[Handwritten Signature]

DIRECTORIAL(MNH/HR)

[Handwritten Initials]

[Handwritten Signature]

[Handwritten Signature]

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ANNEX-BX

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GOVERNMENT OF KHYBER PAKHTUNKHWA INDUSTRIES, COMMERCE AND TECHNICAL EDUCATION DEPARTMENT DATED PESHAWAR THE

NOTIFICATION

NO. SO-III (IND) 4-7/15/Sr:Instt?17/ In pursuance of section 8 of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with rule 17 of Khyber Pakhtunkhwa Civil Servants (appointment, Promotion and Transfer) Rules, 1989, the competent authority has been pleased to order issuance of Final Seniority list of the Chief Instruction / Training Manager/Vice Principal/Senior Instructor/Trainer/Staff Trainer (BPS-17) (who had not opted to become TEVTA employee in creation of TEVTA) is hereby notified / circulated for general information.

FINAL SENIORITY OF CHIEF INSTRUCTOR/ TRAINING MANAGER/ VICE PRINCIPAL/ SENIOR INSTRUCTOR/ TRAINER/ STAFF TRAINER (BPS-17) IN THE KHYBER PAKHTUNKHWA TECHNICAL EDUCATION AND VOCATIONAL TRAINING AUTHORITY, AS STOOD ON 31-12-2017.

Sr. No	Name of Incumbent with academic qualification	Date of Birth with domicile	Date of Entry 1 st ENTRY into Govt: service	Regular Appointment / Promotion to the Present Post			Present Appointment	Remarks
				Date	BPS	Method of recruitment		
1	2	3	4	5	6	7	8	9
1	Mr. Hawas Khan i. DAE (Electrical) ii. 06 Months Inst: Trg: Course	02-08-1962 Mardan	05-05-1988	30-04-2008	17	By Up Gradation	Sr: Instruction	GTV (B) Gulbahar Peshawar
2	Mr. Muhammad Iqbal i. DAE (Auto) ii. 06 Months Inst: Trg: Course	15-07-1960 Mardan	07-05-1988	30-04-2008	17	By Up Gradation	--do--	GTV (B) Takht Bhai
3	Mr. Mehraban Khan, (Welding) i. 01 Year TPC, ii. 06 Months Inst: Trg: Course	08-08-1959 D.I.Khan	05-04-1980	30-04-2008	17	By Up Gradation	--do--	GTV (B) D.I.Khan
4	Mr. Raheem Bakhsh (Electrical) i. 09 Months TPC ii. G-II TPC iii. 01 Year Inst: Trg: Course	15-04-1958 Peshawar	10-08-1992	30-04-2008	17	By Up Gradation	--do--	GATTC H/Abad Peshawar
5	Mr. Muhammad Shakoor i. DAE (Electrical) ii. 12 Months TPC iii. 01 Year Inst: Trg: Course	12-09-1958 Mardan	02-07-1983	30-04-2008	17	By Up Gradation	--do--	GTV (B) Gulbahar Peshawar
6	Mr. Ifiikhar Hussain (Wood work) i. 02 Years TPC ii. 06 Months Inst: Trg: Course	17-04-1963 Peshawar	02-07-1983	30-04-2008	17	By Up Gradation	Staff Trainer	GTTTC H/Abad Peshawar
7	Mr. Khalir Ur Rehman (Auto) i. 09 Months TPC in Auto	01-15-1962 Karak	01-03-1985	30-04-2008	17	By Up Gradation	Sr: Instruction	GTVC (B) Karak

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	ii. 06 Months Inst: Trg: Course iii. G-II level TPC iv. G-III level TPC							
8	Mr. Nasrullah Khan (RAC) i. MA ii. 02 Years TPC iii. 06 Months Inst: Trg: Course iv. DAE in (Electrical)	12-02-1960 Peshawar	12-02-1983	30-04-2008	17	By Up Gradation	Sr: Instruction	GCT Swabi
9	Mr. Abdur Rauf Niazi (Auto) i. BA LLB ii. 03 Years App: Ship: Cert iii. 06 Months Inst: Trg: Course	13-03-1959 Bannu	12-02-1983	30-04-2008	17	By Up Gradation	Sr: Instruction	GTVC (B) Ghazni Khel Lakki
10	Mr. Fasiullah (RTV) i. 18 Months TPC ii. 06 Months Inst: Trg: Course iii. 01 Year Inst: Trg: Course	12-12-1962 Mardan	12-02-1983	30-04-2008	17	By Up Gradation	Sr: Instruction	GTVC (B) Mingora Swat
11	Mr. Ahmad Gul (Bench Filter) i. MA (History) ii. 03 Years DAE iii. 01 Year Inst: Trg: Course	01-08-1963 D.I.Khan	12-02-1983	30-04-2008	17	By Up Gradation	Sr: Instruction	GTVC (B) D.I.Khan
120	Mr. Muhammad Ayaz Khan i. BA. ii. 03 Years DAE iii. 06 Months ITC (Electrical)	01-07-1967 Peshawar	30-08-1992	05-12-2017	17	Promotion	-do-	GTVC Gulbahar
121	Mr. Hayat Khan i. BA. ii. 03 Years DAE (D/M Civil) iii. 06 Months ITC	10-11-1966 LakkiMarwat	14-10-1992	05-12-2017	17	Promotion	-do-	GTVC D.I.Khan
122	Mr. Qamar Ali (Auto) i. DAE ii. 06 Months ITC	19-01-1964 Swabi	01-11-1992	05-12-2017	17	Promotion	-do-	GTVC Gulbahar
123	Mr. Dil Jan Khan i. DAE (Mech) ii. 06 Months ITC	05-12-1969 LakkiMarwat	29-12-1992	05-12-2017	17	Promotion	-do-	GTI Sadda Kurram Agency
124	Mr. Zafar Iqbal (Wood work) i. F.A ii. 02 Years TPC iii. 06 Months ITC	01-12-1967 Peshawar	20-02-1993	05-12-2017	17	Promotion	-do-	GCT Kohat
125	Mr. Shaukat Ali (RAC) i. G-II level TPC ii. 5 Months at in PR iii. 06 Months ITC iv. 02 Years TPC	08-12-1962 Bannu	02-09-1993	05-12-2017	17	Promotion	GTVC Karak	GCT Bannu
126	Mr. Hamayun Khan (Mechanical) i. BA ii. DAE iii. 06 Months ITC Cert	16-02-1971 Khyber Agency	29-05-1997	05-12-2017	17	Promotion	GTVC Peshawar	GTVC (B) Gulbahar Peshawar

Certified that the seniority list is final / up-disputed and not subjudice

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**MANAGING DIRECTOR
KP-TEVTA**

DIRECTOR(ADMN&HR)

NO. SO-III (IND) 4-7/15/Sr:Instt?17

Copy is forwarded to: -

1. The Managing Director KP-TEVTA, University Town, Peshawar.
2. The

Dated _____