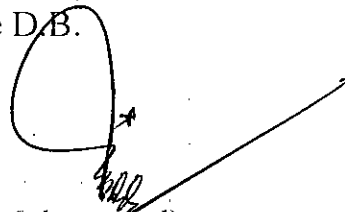


17.10.2022;

Appellant alongwith junior of his counsel present. Mr. Muhammad Nisar, Focal Person alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for official respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that father of learned counsel for the appellant is hospitalized, therefore, he is unable to appear before the Tribunal today. Adjourned. To come up for arguments on 21.11.2022 before the D.B.



(Mian Muhammad)
Member (E)



(Salah-Ud-Din)
Member (J)

21st Nov, 2022

Lawyers on general strike today.

To come up for arguments on 18.01.2023 before D.B. Office is directed to notify the next date on the notice board as well as the website of the Tribunal.



(Fareeha Paul)
Member (E)





(Kalim Arshad Khan)
Chairman

16.09.2021

Mr. Muhammad Yahya Khan as proxy for learned counsel for the appellant present. Mr. Muhammad Nisar, Senior C.T alongwith Mr. Javed Ullah, Assistant Advocate General for the respondents present.

Muhammad Yahya Khan, Advocate sought adjournment on the ground that learned counsel for the appellant is busy in domestic work. Adjourned. To come up for arguments before the D.B on 30.12.2021.


(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

30.12.2021

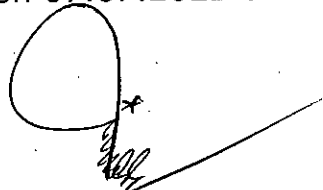
Due to winter vacation, the case is adjourned, to come up for the same on 1/4/2022 before D.B.


Reader

01.04.2022

Appellant in person present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Appellant submitted rejoinder, which is placed on file. Appellant also seeks adjournment on the ground that his newly engaged learned counsel is not available today due to some domestic engagement. Adjourned. To come up for arguments on 07.07.2022 before the D.B.



(Mian Muhammad)
Member (Executive)



Chairman

7-7-22

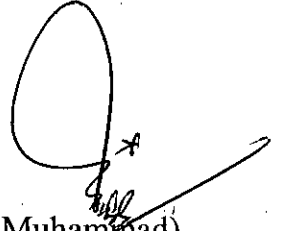
Proper DB not available the case is adjourned
17-10-2022
Reader

30.12.2020

Appellant in person present. Mr. Noor Zaman Khattak,
District Attorney for respondents present.

Written reply on behalf of respondents not submitted.
Learned District Attorney seeks time for submission of
written reply/comments on the next date.

Adjourned to 23.02.2021 before S.B.

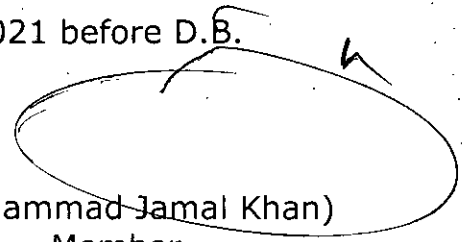


(Mian Muhammad)
Member(E)

23.02.2021

Junior to senior counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General and Mr. Muhammad Nisar, Senior C.T, for the official respondents are also present.

Written reply on behalf of official respondents submitted which is placed on record. Neither private respondents are present nor written replies on their behalf are submitted, therefore, they are proceeded against ex-parte. File to come up for rejoinder and arguments on 03.06.2021 before D.B.



(Muhammad Jamal Khan)
Member

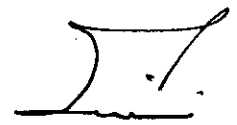
03.06.2021

Learned counsel for the appellant present. Mr. Muhammad Sharif, ADO alongwith Mr. Javed Ullah, Assistant Advocate General for the respondents present.

Learned counsel for the appellant seeking time for submission of rejoinder. Adjourned. To come up for rejoinder as well as arguments before the D.B on 16.09.2021.



(ATIQU-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

5799/2020

18.09.2020

Counsel for the appellant present.

Submitted an application for extension of time to deposit security and process fee which were not deposited within the prescribed period due to curfew in his native district (North Waziristan).

The appellant is required to deposit security and process fee within three working days from duty. Thereafter, notices be issued to the respondents for submission of written reply/comments on 05.11.2020 before S.B.

Appellant Deposited
Security & Process Fee

18/9/20


Chairman

05.11.2020

Junior counsel for appellant is present. Mr. Kabirullah Khattak, Additional AG for the respondents is also present.

Written reply on behalf of respondents not submitted. Learned Additional AG requests for further time to contact the respondents and furnish written reply/comments on the next date of hearing. Adjourned to 30.12.2020 on which date written reply/comments before S.B.


(MUHAMMAD JAMAL KHAN)
MEMBER

20.07.2020

Counsel for the appellant is present. According to the learned counsel, appellant is working as Physical Education Teacher in the Education Department at Government High School Ali Khel, District North Waziristan, that the Writ Petition Bearing WP No.408-B/2013 in the Peshawar High Court Bannu Bench, was filed for appointment which was decided in favour of petitioners including appellant while ignoring the aforesaid order of the High Court on one pretext or the other, the matter was agitated again before the august High Court through COC No. 111-B/2016, at long last the order of the court was implemented resulting into appointment of appellant as PET vide impugned order dated 14.04.2017 while the other writ petitioners were appointed as PETs on 30.11.2016. An appeal was submitted to respondent No. 2 for correction of his date of appointment for availing the accruing benefits but to no avail. He contends that during those days trouble was prevalent in the former Tribal territory now merged area and he could not make a recourse for redressal of his grievance even then he submitted departmental appeal to respondent No. 2 on 14.12.2019 on receiving no reply and due to the Corona Virus he could not agitate the matter within the stipulated period of time.

The points raised need consideration therefore, admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments. To come up for written reply/comments on 18.09.2020.




(MUHAMMAD JAMAL KHAN)
MEMBER

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- **5808** /2020

1S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/06/2020	<p>The appeal of Mr. Aleem Ullah presented today by Syed Wilayat Ali Shah 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 the S. Bench for preliminary hearing to be put up there on <u>20/07/2020</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

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

Service Appeal No. 5898 /2020

Aleem UlahAppellant

VERSUS

Secretary to the Government of Khyber Pakhtunkhuwa,
Elementary & Secondary Education & others
.....Respondents

INDEX

S.No	Description of Documents	Annex ure	Pages
1.	Service Appeal		1-8
2.	Affidavit		9
3.	Addresses of Parties		10-11
4.	Copy of the writ petition	A	12-19
5.	Copy of the Court's order dated 10/12/2015	B	20
6.	Copy of Contempt of court	C	21-23
7.	Copy of the Appointment order of the appellant dated 14/04/2017	D	24
8.	Copy of the appointment orders of the others teachers dated 30/11/2016	E	25
9.	Copy of the first Departmental appeal	F	26-28
10.	Copy of the second departmental appeal	G	29-31
11.	Copies of appointment orders of various categories of teachers	H	32-37
12.	Wakalat Nama		38

*Malafide
Order.
Discretionary
Order.
Temporary
Regular.*

Through Appellant

M.A.
Syed Wilayat Ali Shah
Advocate, Supreme Court
of Pakistan

Date: 16/06/2020

Appellant Deposited
Security of Rs. 1300/-
18/6/2020

Rs. 1300/- (This amount is all only)

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 5799 /2020

Aleem Ulalh S/o Ghazi Muhammad, Physical Education
Teacher (PET), of Government High School Ali Khel,
Resident of District Miran Shah, North Wazirstan

.....Appellant

VERSUS

1. Secretary to the Government of Khyber
Pakhtunkuwa, Elementary & Secondary Education
Department, Civil Secretariat, Peshawar
2. Director, Elementary & Secondary Education,
Khyber Pakhtunkhwa, G.T Road Peshawar
3. District Education Officer (Male), District Miran
Shah, North Wazirstan.
4. Akhtar Ali Khan S/o Syed Naik Khan, (PET)
Government High School Muhammad Khel, Tehsil
Datta Khel
5. Nomran Khan S/o Yaseen Khan (PET) Government
High School Muhammad Khel, Tehsil Datta Khel
6. Rehman Zeb S/o Muhammad Rehan (PET)
Government High School Lund Datta Khel,
7. Shahid Ullah S/o Pasti Khan (PET) Government
Middle School Nizam Kot Lakka Village Dossali.
8. Rasool Jehan Khan S/o Riaz Muhammad Khan
(PET) Government Middle School Gardi Rogha
Dossali

9. Abid ur Rehman S/o Sher Gul (PET) Government High School Tall Village Miranshah
10. Kausar Iqbal S/o Gul Kem Khan (PET) Government High School Spulga Miran Shah
11. Ihsan Ullah S/o Noor Aslam (PET) Government Middle School Saib Jan Kot Shawa

.....Respondents

APPEAL U/S 4 OF KHYBER
PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974, AGAINST
THE IMPUGNED ORDER OF THE
RESPONDENT NO. 3 DATED
14/04/2017, WHEREBY THE
APPELLANT HAS NOT BEEN
APPOINTED FROM THE CORRECT
AND PROPER DATE AND THE
NON DECISION OF THE
RESPONDENTS NO. 1 TO 3 ON THE
DEPARTMENTAL APPEALS OF
THE APPELLANT DATED
05/04/2018 AND 14/12/2019

Prayer in appeal:-

Accepting the appeal of the
Appellant, the Respondents No. 1 to
3 may be ordered to make

necessary amendment/correction in the date of appointment of the Appellant, so that his appointment could take effect from 30/11/2016.

Sheweth:-

The Appellant respectfully submits as under:

1. That the Appellant has been working as a Physical Education Teacher (PET) in Education Department at Government High School Ali Khel, District Miran Shah.
2. That before appointment the Appellant and other candidates filed a Writ Petition (W.P No. 408-B/2013 in the Peshawar High Court Bannu Bench, for their appointments **(Copy of the writ petition is annexed as "A")**.
3. That the case was decided in favour of the petitioners, including the appellant **(Copy of the court's order dated 10/12/2015 annexed as "B")**
4. That the Respondents started dilly dallying in the implementation of the Court's order, therefore, the Appellant and the others knocked again at the door

*ڈاکٹر محمد اسحاق جوہر
Physical Teacher
To act - Play fuller*

of High Court through COC No. 111-B/2016 (**Copy of COC is annexed as "C"**)

5 That the Court issued Notice to the Respondents and as such the Respondents in COC were compelled to issue the appointment orders of the writ petitioners.

6. That the Appellant/petitioner was appointed as PET vide impugned order dated 14/04/2017 (**Copy of the order is annexed as D**), while the other writ Petitioners were appointed as PET on 30/11/2016. (**Copy of the order annexed as "E"**).

primary Education Teachers

7. That the appellant submitted an appeal to the Respondent No. 2 for correction in his date of appointment so that he could avail the benefit of appointment w.e.f. 30/11/2016 instead of 14/04/2017 (**Copy of the appeal is annexed as F**).

sudden change

8. As there was upheaval in the Administration as the merger of FATA into the province of Khyber Pakhtunkhwa was under way, therefore, the Education Department failed to give any response to the Appellant.

9. That after the merger of FATA into the province of Khyber Pakhtunkhwa, the Appellant submitted a departmental appeal to the Respondent No. 2 for the redress of his grievance on 14/12/2019 **(Copy of the departmental appeal annexed as G).**
10. That the Appellant was not given any reply from the concerned authority.
11. That due to Corona Virus the offices remained closed and the entire country remained under locked down. As such the Appellant could not file the appeal in the Tribunal after the expiry of statutory period of 90 days. Now when the offices have been reopened, therefore, the Appellant is filing this Appeal before the Honourable Tribunal for the redress of his grievance on the following amongst the other grounds.

GROUND S:-

- A. That the Impugned Order dated 14/04/2017 passed by the Respondent No. 3 is the worst example of discrimination and injustice. It is worth mentioning that other petitioners in the writ petition No. 408-B/2013 were appointed against their posts on 30/11/2016, whereas the Appellant was appointed

on 14/04/2017. So it represents mal-administration on the part of the Respondent No. 3.

- B. That non decision on the departmental appeals of the Appellant by the Respondents No. 1 to 3 represents inefficiency, ignorance and malafide intentions on their part.
- C. That on account of appointing the Appellant w.e.f. 14/04/2017, the Respondents have given a severe loss to the appellant. If the date of his appointment is not corrected, the Appellant will definitely lose his seniority and chances of promotions.
- D. That private Respondents No. 4 to 11 were also the petitioners in Writ Petition No. 408-B/2013 alongwith Appellant. If they are appointed on 30/11/2016 than why the Appellant has not been appointed from the same date? The Respondents No. 1 to 3 have done great injustice to the Appellant. As a result of this unlawful act, the Respondent No. 4 to 11 will surpass the Appellant in seniority and they will also avail chances of promotion by kicking back the Appellant.

E. Apart from Physical Education Teachers, the other categories of teachers were appointed on 30/11/2016, while the Appellant was appointed on 14/04/2017. So discrimination, injustice and mal-administration on the part of Respondents No. 1 to 3 (especially Respondent No. 3) are evident **(Copies of appointment orders of various categories of teachers are annexed as H).**

F. That the Respondents No. 1 to 3 have not decided the departmental appeals of the appellant which shows that they have made up their mind to cause harm and irreparable loss to the Appellant in future.

G. That the Respondents No. 1 to 3 are legally bound to correct the date of appointment of the Appellant as 30/11/2016 by making necessary amendment /correction in the Impugned Order dated 14/04/2017, so that the Appellant may not be deprived of his right.

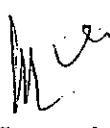
Graph

H. That the Appellant shall also rely on the additional grounds after filing the written statement by the Respondents.

I. In the light of the above the Impugned Order dated 14/04/2017 is liable to be set aside or modified and the non decision on the part of the Respondent No. 1 to 3 are liable to be declared null and void.

It is humbly prayed that accepting this appeal in favour of the Appellant and against the Respondents with cost by setting aside or modifying the Impugned Order dated 14/04/2017, the Respondents No. 1 to 3 may kindly be ordered to make changes in the date of appointment of the Appellant so that the Appellant could be treated appointed w.e.f. 30/11/2016.

Through Appellant


Syed Wilayat Ali Shah
Advocate, Supreme Court
of Pakistan

Date: 16/06/2020

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2020

Aleem Ulah

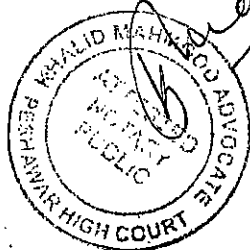
.....Appellant

VERSUS

Secretary to the Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education & others
.....Respondents

AFFIDAVIT

I, Aleem Ulah S/o Ghazi Muhammad, Physical Education Teacher (PET), of Government High School Ali Khel, Resident of District Miran Shah, North Waziristan, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



A
DEPONENT

2606-4122201-5

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

Service Appeal No. _____/2020

Aleem Ulalh **Appellant**

VERSUS

Secretary to the Government of Khyber Pakhtunkuwa,
Elementary & Secondary Education & others
..... **Respondents**

ADDRESSES OF PARTIES

APPELLANT

Aleem Ulalh S/o Ghazi Muhammad, Physical Education
Teacher (PET), of Government High School Ali Khel,
Resident of District Miran Shah, North Wazirstan


RESPONDENTS

1. Secretary to the Government of Khyber
Pakhtunkuwa, Elementary & Secondary Education
Department, Civil Secretariat, Peshawar
2. Director, Elementary & Secondary Education,
Khyber Pakhtunkhwa, G.T Road Peshawar
3. District Education Officer (Male), District Miran
Shah, North Wazirstan.
4. Akhtar Ali Khan S/o Syed Naik Khan, (PET)
Government High School Muhammad Khel, Tehsil
Datta Khel
5. Nomran Khan S/o Yaseen Khan (PET) Government
High School Muhammad Khel, Tehsil Datta Khel

6. Rehman Zeb S/o Muhammad Rehan (PET)
Government High School Lund Datta Khel,
7. Snahid Ullah S/o Pasti Khan (PET) Government
Middle School Nizam Kot Lakka Village Dossali.
8. Rasool Jehan Khan S/o Riaz Muhammad Khan
(PET) Government Middle School Gardi Rogha
Dossali
9. Abid ur Rehman S/o Sher Gul (PET) Government
High School Tall Village Miranshah
10. Kausar Iqbal S/o Gul Kem Khan (PET) Government
High School Spulga Miran Shah
11. Ihsan Ullah S/o Noor Aslam (PET) Government
Middle School Saib Jan Kot Shawa

Through

Appellant



Syed Wilayat Ali Shah
Advocate, Supreme Court
of Pakistan

Date: 16/06/2020

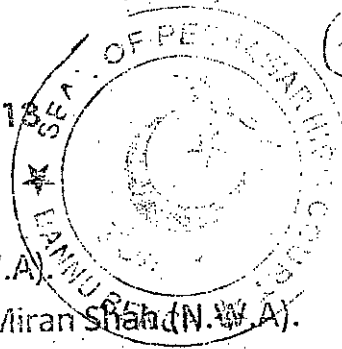
39

12

A

THE PESHAWAR HIGH COURT BANNU BENCH BANNU

WRIT PETITION NO: 408-B / 2013



- 1. RAFIQ ULLAH S/O MIR AJAM KHAN Resident of Mir Ali (N.W.A)
- 2. ALEEM ULLAH S/O GHAZI MUHAMMAD Resident of Tehsil Miran Shah (N.W.A).
- 3. FAZAL WALI S/O HAJI JALIL
- 4. ASWAN ULLAH S/O BAKHT ALI KHAN
- 5. SIRAJ ULLAH S/O KHAN GUL KHAN
- 6. BANARAS KHAN S/O HUKAM GUL

All residents of Tehsil Mir Ali (NWA)

- 7. ZAHID ULLAH S/O GUL ZALI KHAN
- 8. TAHIR ZAMAN S/O LAIQ ZAMAN
- 9. SULEMAN KHAN S/O GUL NAWAZ KHAN
- 10. HAKEMEEN KHAN S/O ISMAIL KHAN
- 11. MUHAMMAD NAVEED S/O M.AYAZ KHAN
- 12. ZABET KHAN S/O IZZAT KHAN
- 13. SHAHID ULLAH S/O GHAZI JANAN
- 14. NOOR AFTAB S/O NAIK ZAMAN
- 15. DILAWAR JAN S/O DILBER JAN
- 16. ABID-UR-REHMAN S/O SAHAR GUL
- 17. IRAM NABI D/O HAZRAT NABI
- 18. WALI ULLAH S/O MIR AJAM KHAN
- 19. RAHIM ULLAH S/O ABDUL LATIF
- 20. BADSHAH ZAR KHAN S/O SYED RAUF Resident of Tehsil Ghulam Khan (NWA).

All Residents of Tehsil Miran Shah(NWA)

- 21. ABDULAZIZ KHAN S/O SHEROZ KHAN
- 22. BAKHTAWAR JAN S/O WAKEEL KHAN.
- 23. TAJ MALOOK S/O SARWAR KHAN
- 24. FARHAD ULLAH S/O NABOWAT KHAN
- 25. MUHAMMAD MUSTAFA S/O GUL NAWAZ KHAN
- 26. KALIM ULLAH S/O NAIK NAWAZ Resident of Tehsil Razmak (NWA).
- 27. SHER AHMAD S/O ILYAS KHAN Resident of Tehsil Razmak (NWA).
- 28. SIRAJ ULLAH S/O FAZAL MEHMOOD Resident Of Tehsil Spinwal.(NWA).

All Residents of Tehsil Dossali (NWA)

Filed Today

Additional Registrar
9-12-13

(Petitioners)

(1)

ATTESTED

ENCL. NO. 1
Peshawar High Court
Bannu Bench

~~13~~ (2) (13)
VERSUS

1. ADDITIONAL CHIEF SECRETARY - FATA
SECRETARIAT, WARSAK ROAD PESHAWAR.
2. DIRECTOR EDUCATION (FATA) - FATA
SECRETARIAT PESHAWAR.
3. POLITICAL AGENT - NORTH WAZIRISTAN
AGENCY MIRANSHAH.
4. AGENCY EDUCATION OFFICER - NORTH
WAZIRISTAN AGENCY MIRANSHAH.
5. PRINCIPAL GOVERNMENT POST GRADUATE
COLLEGE MIRANSHAH.
6. PRINCIPAL GOVERNMENT GIRLS HIGH
SCHOOL MIRANSHAH.
7. PRINCIPAL GOVERNMENT DEGREE COLLEGE
MIRANSHAH.
8. PRINCIPAL GOVT: HIGHER SECONDARY
SCHOOL EIDAK (N.W.A).
9. AGENCY ACCOUNT OFFICER N.W.A
MIRANSHAH.
10. ASSISTANT AGENCY EDUCATION
OFFICER FEMALE (N.W.A).

(Respondents)

Filed Today
7-12-13
Writ petition under Article 199 of The
Constitution of The Islamic Republic of
Pakistan, 1973.

ATTACHED
Peshawar High Court
Waziristan Bench

(2)

~~17~~ (3) (14)

Note: Addresses given above shall suffice the object of service upon parties. All necessary and proper parties have been arrayed in the panel of respondents.

(3)

PRAYER:

- a) On acceptance of the instance writ petition, it is most humbly requested to please declare order Dated 21-9-2013 made by respondent # 3 as illegal without lawful authority and consequently requested please to direct the respondent #4 and 5, that petitioners may please be appointed according to merit lists.
- b) Any other relief deemed just and appropriate in circumstances of the case may be allowed in favor of the petitioners against the respondents.

[Handwritten signature]
(Att.)

INTERIM RELIEF:

That pending final adjudication of the instance writ petition the operation of the impugned order of the respondent # 3 may be suspended till the decision of the present writ petition.

Filed Today

[Handwritten signature]
Additional Registrar 2
7-12-13

RESPECTFULLY SHEWETH:

The petitioners very graciously submit as follow.

ATTESTED
[Handwritten signature]
EXAMINER
Peshawar High Court
Bannu Bench

(3)

1) That the petitioners applied for the vacant advertised vacancies having knowledge through Paper media issued by respondent # 4 and 5.

Note: The advertisement of Daily AAJ dated 28th April, 2012 is enclosed as Annexure "A".

2) The Petitioners being residents of North Waziristan Agency and having the required qualification applied for the post and accordingly merit lists were prepared which are enclosed herewith as Annexure "B".

3) That after the preparation of Merit Lists the petitioners were called for test and interview and they qualified distinct positions in the test.

4) That the departmental selection committee duly selected the petitioners for the post and merit list was prepared.

5) That now the petitioners have got the knowledge that the respondents for unknown reasons are appointing other persons instead of the petitioners, so we have filed this Constitutional Petition before this Honorable Court.

6) That petitioner # 21 Abdul Aziz Khan S/O Sheroz Khan's name is included in Tehsil Dossali for the Trade of C.T and also for the

(Handwritten signature)
AHC

Filed Today
Additional Registrar
7-12-13

ATTESTED
Peshawar High Court
Peshawar

~~115~~ (116)

(116)

Trade of I.T Lab Incharge, while Petitioner # 22 Bakhtawar Jan S/O Wakeel Khan For the Trade of C.T and also for the Trade of JDPE/PET. Petitioner # 23 Taj Malook S/O Sarwar Khan applied for C.T and also for the Trade of T.T. Zabet Khan Petitioner S/O Izzat Khan (Petitioner # 12) name was sited in Merit list for both C.T and I.T Lab Incharge.

7) That the petitioners submitted their Educational Testimonials for applied trades which were verified from the concerned Board / University and some of the petitioners received back their testimonials.

(Signature)
(AHC)

8) That respondent # 3 on date: 21-9-2013 cancelled the appointment orders of petitioners wrongly. Copy of the cancelation order is enclosed as Annexure C.

9) That aggrieved from the order of respondent # 3 dated: 21-9-2013 the petitioners were left with no other appropriate remedy except to invoke the Constitutional Jurisdiction of this August Court Inter alia on the following grounds.

Filed Today
Additional Registrar
7-12-13

ATTESTED
(Signature)
EXC. CLERK
Peshawar High Court,
Banna Bench

17
GROUND:

22

- 1) That the order impugned here in, are against the law and with no lawful authority, hence not plausible in the eye of law.
- 2) That Petitioners were condemned unheard and no show cause notices were issued to them.
- 3) That the merit lists of the petitioners were prepared according to their testimonials, Bio data and interview, so the legal rights were accrued to the petitioners which cannot be taken away through illegal orders.
- 4) That the Petitioner # 21 and 25 were issued appointment letters on 28th August, 2013. Copies of the same are enclosed as Annexure "D" and "E" respectively.
- 5) That the Petitioner being citizen of Pakistan deserves to be dealt in accordance with law and the treatment meted out to them is in violation of Article 4 of the Constitution of The Islamic Republic of Pakistan.
- 6) That some other grounds maybe raised at the time of arguments.

(Handwritten signature)
AHE

ATTACHED
(Handwritten signature)
Sd/-
Registrar

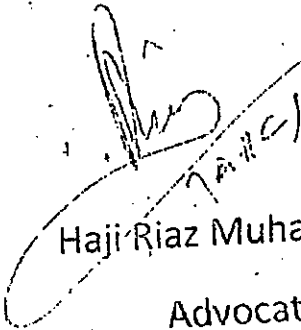
Filed Today
(Handwritten signature)
Additional Registrar
7-12-13

~~XXXX~~ (LX)

(93)

It is, therefore most humbly prayed that this writ petition may please be allowed as prayed for above.

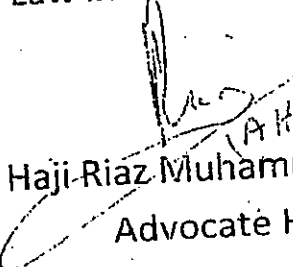
Dated: 06-12-2013


Haji Riaz Muhammad Khan
Advocate High Court
Bannu.

Petitioner,
Through

CERTIFICATE:

It is certified that neither such prior petition has earlier been filed in this court nor is pending in any court of Law in Pakistan.



Haji Riaz Muhammad Khan
Advocate High Court
Bannu.


Through

BOOKS:

- Constitution of The Islamic Republic of Pakistan 1973
- Civil servant Act 1973 KP
- Notification # SO (PE) 2-7 / Fata / Rec B-15 and below / 08 Government of N.W.F.P now K.P.K Elementary and Secondary Education Department Peshawar Dated 29th October, 2008.
- Case law as per need

Filed Today
by
Registrar
7-12-13

ATTESTED

EXAMINER
Peshawar High Court,
Bannu Bench


ADVOCATE
(7)

19

24

IN THE PESHAWAR HIGH COURT BANNU BENCH BANNU

RAFIQ ULLAH & OTHERS VERSUS ADDITIONAL CHIEF SECRETARY FATA
SECRETARIAT & OTHERS

AFFIDAVIT:

I RIAZ MUHAMMAD KHAN COUNCIL FOR THE PETITIONERS AS PER INFORMATION CONVEYED TO ME BY MY CLIENTS, DO HEREBY DECLARE ON OATH THAT THE CONTENTS OF THIS INSTANT WRIT PETITION TO THE BEST OF MY KNOWLEDGE AND BELIEF ARE TRUE AND THAT NOTHING HAS BEEN CONCEALED FROM THIS HONOURABLE HIGH COURT.

No. 1805
Certified that the above was verified on solemnly
affirmed by ablu
day of Dec 13 by Riaz Muhammad Khan
at Awad Bannu
who was identified by self
who is personally known to me

DEPONENT

HAJI RIAZ MUHAMMAD KHAN
ADVOCATE HIGH COURT BANNU
COUNCIL FOR PETITIONERS

Oath Commissioner
Peshawar High Court
Bannu Bench

[Signature]
(A.H.C.)

Filed Today
Additional
7-12-19

ATTESTED
[Signature]
Peshawar High Court
Bannu Bench

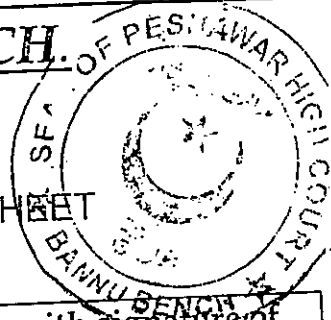
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B

**PESHAWAR HIGH COURT,
BANNU BENCH.**

FORM 'A'

FORM OF ORDER SHEET



Date of order or proceedings (1)	Order or other proceedings with signature of Judge (s). (2)
10.12.2015	<p><u>W.P No.408-B of 2013.</u></p> <p>Present:</p> <p>Haji Riaz Muhammad Khan Advocate for petitioners.</p> <p>Said Noor Khan Asstt: Agency - Education Officer along with Bahlol Khan Khattak, D.A.G.</p> <p>***</p> <p><u>IKRAMULLAH KHAN, J.-</u> The learned counsel for the petitioners as well as Assistant Agency Education Officer along with DAG, present in court candidly stated that they will inquire about and will confirm the merit list as far as the merit of the petitioners are concerned and if they were found to be qualified on merit would be appointed, so it is directed that if the petitioners were on their merit and were eligible to be appointed, the respondents shall appoint them. So this writ petition is disposed of accordingly.</p> <p><u>Announced.</u> 10.12.2015.</p> <p style="text-align: right;"><i>Sd/- Ikramullah Khan, J</i></p> <p style="text-align: right;"><i>Sd/- Muhammad Chazan Khan, J</i></p>

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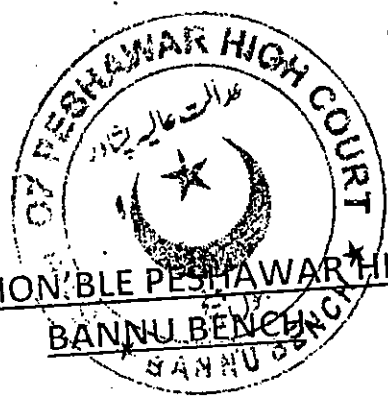
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Examiner

(21)

Annexure "C"



(B) T (C)

BEFORE THE HON'BLE PESHAWAR HIGH COURT,
BANNU BENCH

C.O.C PETITION NO. 111-B/ 2016

In
WRIT PETITION No. 138-B OF 2014, 408-B OF 2013 AND 387-B OF 2015.

MEMO OF ADDRESS.

1. Aleem Ullah S/O Ghazi ^{Muhammad} PET R/O Chashma Tehsil Miranshah. N.W.A
2. Mst. Eram Nabi D/O Hazrat Nabi PET R/O Chashma Tehsil Miranshah. N.W.A
3. Rafiq Ullah S/O Mir Ajam Khan C.T R/O Malangan Tehsil Mir Ali. N.W.A
4. Dilwar Jan S/O Dilbar Jan CT R/O Palangzai Tehsil Miranshah. N.W.A
5. Abid Ur Rehman S/O Sahar Gul PET R/O Khuzai Darpa Khel Miranshah. N.W.A
6. Muhammad Usman S/O Samandar Khan TT/AT R/O Tappi Miranshah. N.W.A
7. Ghani Ullah S/O Ali Bahadur TT/AT R/O Tappi Miranshah. N.W.A
8. Ragebullah S/O Shamaraz Khan TT. R/O Mubarak Shahi Tehsil Mir Ali N.W.A
9. Nazar Ur Rehman S/O Sheraz Gul DM R/O Eppi Tehsil Mir Ali. N.W.A
10. Noor Aftab S/O Nek Zaman DM R/O Chashma Tehsil Miranshah. N.W.A
11. Zahid Ullah S/O Gul Zali Khan DM R/O Miranshah Kala Tehsil Miranshah. N.W.A
12. Wali Ullah S/O Mir Ajam Khan I.T (Lab Incharge) R/O Miranshah Kala Tehsil N.W.A
Miranshah. N.W.A
13. Bad Shah Zar S/O Syed Rouf C.T R/O Gurbaz Tehsil Ghulam Khan. N.W.A
14. Aswan Ullah S/O Bakht Ali Khan DM R/O Haider Khel Tehsil Mir Ali. N.W.A
15. Banaras Khan S/O Hukam Khan DM R/O Bora Khel Mir Ali. N.W.A
16. Zabab Ullah S/O Izat Khan CT IT (Lab Incharge) R/O Palangzai Miranshah. N.W.A
17. Fazal Wali S/O Jalil Khan C.T R/O Eppi Tehsil Mir Ali. N.W.A
18. Suleman Khan S/O Gul Nawaaz Khan DM R/O Miransh Kala Miranshah. N.W.A
19. Kaleem Ullah S/O Nek Nawaz TT/AT R/O Data Khel Razmak. N.W.A
20. Hussain Ullah S/O Khaki Ur Rehman CT R/O Haider Khel Tehsil Mir Ali. N.W.A
21. Hakameen Khan S/O Ismail Khan CT R/O Tappi Tehsil Miranshah. N.W.A
22. Sher Ahmad S/O Ilayas Khan CT R/O Khushali Tehsil Razmak. N.W.A
23. Noor Muhammad S/O Rehmat Khan DM R/O Khushali Tehsil Razmak. N.W.A
24. Kamran Khan S/O Aslam Khan IT R/O Shah Khimar Tehsil Razmak. N.W.A
25. Farhad Ullah S/O Nabowát Khan R/O Dossali Tehsil Dossali NWA.
26. Siraj Ullah S/O Fazal Mehmood CT R/O Shamiri P/O Spinwam Tehsil Spinwam. N.W.A

Handwritten signatures and date 6/2/2016

Stamp: Re-Filed Today, Additional

ATTESTED

EXAMINER
Peshawar High Court

22

27. Bakhtawar Jan S/O Wakeel Khan R/O Dossali Tehsil Dossali NWA.

28. Taj Malook S/O Sarwar Khan R/O Dossali Tehsil Dossali NWA.....(Petitioners)

VERSUS

- 1- Muhammad Aslam Kambwa, Additional Secretary Education FATA, FATA Secretariat Warsak Road, Peshawar.
 - 2- Syed Waqar Ul Hassan, Secretary Education FATA Secretariat, Warsak Road, Peshawar.
 - 3- Hameed Ullah Khan, Director Education (FATA) FATA Secretariat, Warsak Road, Peshawar.
 - 4- Kamran Khan, Political Agent North Waziristan Agency Miranshah.
 - 5- Muhammad Nabi ,Agency Education officer Miranshah FATA.
- (Respondents)

Dated: 27/01/2016

Petitioners through,

Muhammad Rashid Khan (Wazir)
Advocate, High Court.

ATTESTED

EXAMINER
Peshawar High Court
Bannu Bench

Re- Filed today
03 FEB 2016
Additional Registrar

6/2/2016

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PESHAWAR HIGH COURT,
BANNU BENCH.

FORM 'A'
FORM OF ORDER SHEET

Date of order or proceedings
(1)

Order or other proceedings with signature of Judge (s).
(2)

04.04.2016

C.O.C No.111-B of 2016.

Present:

Mr. Alamzeb, Advocate for petitioner.

Deputy Attorney General for respondents along with respondent No.5.

Respondent No.3 is not in attendance.

Bailable warrant of arrest in the sum of Rs.50,000/- (fifty thousand) with two sureties each in the like amount to the satisfaction of Additional Registrar of this Court be issued against respondent No.3. Adjourned to next available Division Bench.

sdc/ Muhammad Capurwaf Khanji
sdc/ Haider Ali Khanji

CERTIFIED TO BE TRUE COPY

Examiner
Peshawar High Court Bannu Bench
Authorised Under Article 87 of
The Qanun-e-Shahadat Order 1984

[Signature]
D. Ihsan P.H.C. Bannu

APPOINTMENT ORDER.

In the light of Peshawar High Court Bannu Bench decision vide write petition/COC No-111-B/2016, write petition No- 387-B/2015, No-138-B/2014, NO-408-B/2013 and the approval of Departmental Selection committee constituted by Director Education FATA Khyber Pakhtunkhwa Peshawar Endstt: order No- 5518-29 dated Peshawar the 16-05-2016, the review committee of the Merit List No-1122-29 dated 09-11-2016 and the Political Agent NWA approval order No- 1350/EC/dated Miran Shah the 14-12-2016 One Mr: Alim Ullah S/O Ghazi Muhammad is hereby Appointed against vacant PET post at GHS Ali Khel Tehsil Miran Shah North Waziristan Agency in BPS- 15 @ Rs: (13510-1120-47110) plus usual allowances as admissible under the rules with effect from the date of his taking-over charge.

TERMS & CONDITION.

- 1- His appointment is made on Temporary Basis and is liable to terminate at any time without notice, if he wishes to resign from his post; he should give one month prior notice or forfeit one month pay in lieu thereof.
- 2- He should bring his Health & Age Certificate from the Medical Superintendent AHQ Hospital Miran Shah North Waziristan Agency.
- 3- If he fails to resume his charge with in 15-days his order will be treated as cancelled.
- 4- He should not be handed over charge if he below 18-years and above 35-years of age.
- 5- His original qualifications, date of birth, Domicile Certificate and CNIC should be checked and photocopy may be placed on record.
- 6- He will be terminated if his Academic/Professional certificates were found fake/Bogus and tempered.
- 7- The appointee is entitled for all benefit admissible to Civil Servants.
- 8- His academic/professional Qualifications will be referred to concerned Board/University etc by depositing usual fee charges for proper necessary verification and his salary will not been drawn until and unless verification is received in this office.

Sd/-
AGENCY EDUCATION OFFICER
NORTH WAZIRISTAN AGENCY

No 2943-47 /PET/Appt/AEO/NWA/Dated Miran Shah the 14/04/2017

Copy to the:

- 1- Honourable Registrar Peshawar High Court Bannu Bench at Bannu.
- 2- Director Education FATA Khyber Pakhtunkhwa Peshawar.
- 3- Political Agent North Waziristan Agency at Miran Shah.
- 4- Agency Accounts Officer North Waziristan Agency.
- 5- Principal GHS Ali Khel (NWA)
- 6- AAEO Circle Concerned.
- 7- Candidate Concerned.
- 8- Office Copy.

Sd/-
AGENCY EDUCATION OFFICER
NORTH WAZIRISTAN AGENCY

PET Male

OFFICE OF THE AGENCY EDUCATION OFFICER N.W. AGENCY MIRANSHAH

APPOINTMENT ORDER / COURT DECISION

25

Annexure

E

In the light of Peshawar High Court, Bannu Bench decision vide Writ Petition/COC No.111-2/2016, W.P. No.387-B/2015,138-B,2014,408-B/2013, the approval of the Departmental Selection Committee constituted by Director Education FATA K.P.K Peshawar order No. 5513-29 dated 16/5/2016 and the review committee of the merit list No.1122-29 dated 09/11/2016, the following candidates are hereby appointed against the vacant post of PET (Male) BPS-09 at Rs: (9860-610-28160) Per Month plus usual allowances as admissible under the rules with immediate effect in the interest of Justice /Public Service.

SN.O	Name	Place of Posting	Remarks
1.	Akhtar Ali khan S/o Syed Nek khan	GHS Datta khel ^{Mehal khel} Datta khel	Vacant Post
2.	Nomran Khan S/o Yaseen khan	GHS Datta khel	Vacant Post
3	Rahman Zeb S/o Muhammad Rehan	GHS Land Datta khel.	Vacant Post
4	Shahidullah S/o Pasit Khan	GMS Nezam kot Laka village Dossali.	Vacant Post
5.	Rasool Jehan khan S/O Riaz Muhammad khan.	GMS Gardi Rogha Dossali.	Vacant Post
6. ✓	Abid ur Rehman S/o Sher Gul	GHS Tall Village Miranshab	Vacant Post
7.	Kausar Iqbal S/O Gul Kem Khan	GHS Spulga Miranshab	Vacant Post
8.	Jhsauallah S/O Noor Aslam	GMS Sahib Jan kot Shewa	Vacant Post

Terms & conditions:

1. His/Her appointments shall be on regular basis in accordance with the Government Policy in vogue.
2. His/Her appointment shall be subject to the provision of medical fitness Certificate issued by the concerned Medical Superintendent.
3. He/She shall be governed under such rules, regulation, orders and ordinances etc relating to appointment and promotion.
4. At any time without notice and without assigning any reason his/her Service Will be Considered Terminated during the period of his/her appointment on probation i.e his/her work during the initial period of one year of services was not found satisfactory.
5. His/Her appointment shall stand cancelled from the date of issue of this order , if his/her documents could not be verified.
6. His/Her salary shall not be drawn till the verification of all the concerned documents/Testimonials.
7. One month prior notice shall be given to the Government in case of resignation or leaving the service.
8. If he/she fail to assume his/her charge within 15 days, his/her order shall be treated as cancelled.
9. He/She will be terminated if he/ her certificates found false/bogus and tempered.
10. He/She should not be handed over charge if he/she below 18 years and above 35 year of age.

Agency Education Officer,
North Waziristan Agency

Encls:- No. 1336-48 /Appointment/PET/MD/AEO/MRN Dated 30/11/2016.

Copy To:-

1. The Registrar honorable Peshawar High Court, Bannu Bench Bannu.
2. The Director of Education (FATA) Secretariat Peshawar.
3. The Political Agent NWA Miranshab.
4. The Agency Accounts Officer Miranshab.
5. AAO Concerned.
6. Candidate concerned.

Agency Education Officer,
North Waziristan Agency

(26) (A) Annexure (F)

The Honorable Director Education Fata Services,
Warsak Road, Peshawar.

DEPARTMENTAL APPEAL AGAINST THE ORDER
DATED 14/04/2017. & THE SAME ORDER MAY BE
DEEMED TO HAVE BEEN MADE ON 30/11/2016.

Prayer in appeal:-

ON ACCEPTANCE OF DEPARTMENTAL APPEAL THE
APPOINTMENT ORDER, DATED 14/04/2017. MAY
KINDLY BE CORRECTED AND DATE OF
APPOINTMENT OF THE APPELLANT MAY BE
MENTIONED AS 30/11/2016 INSTEAD OF
14/04/2017.

RESPECTFULLY SHEWETH:

1. That the appellant belongs to Miran Shah North Waziristan agency.
2. That the appellant was one of the petitioners in writ petition No. 408-B/2013 which was accepted by Peshawar High Court Bannu Bench vide order dated 10/12/2015.
3. As the order dated 10/12/2015 was not implemented by the concerned department hence Contempt of Court Proceedings

28

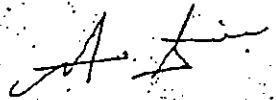
8. The wrong date mentioned in the appointment order of the applicant has created great difficulties to the appellant which is a wrong date.

9. The wrong date of appointment order will create difficulties and hurdeles in the way of the appellant because other candidates will be deemed as senior to the appellant which will be an unequal treatment. The appellant will also be deprived of seniority and will also lose the chances of promotion in future.

It is requested that on acceptance of this departmental appeal date of appointment order of the appellant as PET may be corrected and the appellant may be shown appointed on 30/11/2016 instead of 14/04/2017.

Dated: 05/04/2018

Aleem ullah S/o Ghazi Muhammad
PET Govt. High School Ali Khail
R/o Miran Shah North Wazirstan Agency.
Cell # 0332-9737980
CNIC # 21506-4122701-5



(29)

Annexure

(9)

To

The Hon'ble Director
Elementary and Secondary
Education G.T Road,
Peshawar
Near G.H.S No. 1 Peshawar (KPK)

Subject: DEPARTMENTAL APPEAL AGAINST THE ORDER DATED 14/04/2017 AND THE SAME ORDER MAY KINDLY BE RECTIFIED AND DEEMED TO HAVE BEEN MADE ON 03/11/2016.

Prayer in appeal:

On acceptance of departmental appeal the appointment order dated 14/04/2017 may kindly be connected and date of appointment of the appellant may be mentioned as 30/11/2016, instead of 14/04/2017.

Respected Sir,

applicant most humbly submits as below:

1. That the appellant belongs to Miran Shah District North Waziristan.
2. That the appellant was one of the petitioners in writ petition No.408-B/2013 which was accepted by Peshawar High Court Bannu Bench vide order dated 10/12/2015.
3. As per the order dated 10/12/2015 was not implemented by the concerned department, hence contempt of court proceedings were initiated against the department concerned Contempt of court number was 111-B/2016 during pendency of contempt of court proceeding the education department North Waziristan Agency (now merged in KPK as District North Waziristan) made

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appointments of different petitioners. Likewise on the posts of Male P.E.T, Pesh-Imam, Male C.T, male D.M. Female PET male J.T Lab Incharge.

4. Appellant has been shown vide appointment order to be appointed on 14/04/2017.
5. Whereas others petitioners in the contempt of court proceedings have been shown to be appointed on 30/11/2016 whereas petitioner have been shown appointed on 14/04/2017.
6. That the basic order, the basic proceeding which culminated into appointment of the appellant and rest of the candidates was one and the same, whereas the appointment order of the appellant is shown to be 14/04/2017 which is wrong date of appointment.
7. It was incumbent upon the (EAO North Waziristan Agency) now Waziristan district to have shown the correct date of appointment of appointment as 30/11/2016 as the case of the other candidates and writ petitioners.
8. The wrong date mentioned in the appointment order of the appellant has created great difficulties to the appellant which is a wrong date.
9. The wrong date of appointment order will create difficulties and hurdles in the way of the appellant because other candidates will be deemed as senior to the appellant which will be an unequal treatment. The appellant will also

be deprive of the seniority and will also loss the chances of promotion in future.

- 10. Previously the appellant has & filed his departmental appeal before the Hon'ble (the than) division education FATA services Warsak Road but the grievances of the petitioner was not taken into consideration, (copy of previous departmental appeal, appointment & order are annexure A, B & C respectively)

It is, therefore, most humbly prayed that on acceptance of this departmental appeal date of appointment order of the appellant as P.E.T may be corrected and the appellant may be shown appointed on 30/11/2016 instead of 14/04/2017.

Dated: 14-12-2019.

Comra

18.13.3.2020

Aleem Ullah S/o Ghazi
 Muhammad P.E.T Govt. High
 School Ali Khail.
 R/o Miran Shah North
 Waziristan Tribal District.

A. Jir

cell NO : 0332-9737980

CNIC : 21506-4122701-5

14-12-
 14-1-
 14-2-
 14-3-

P/Imam (32)
OFFICE OF THE AGENCY EDUCATION OFFICER N.W. AGENCY MIRANSHAH

Annexure
(H)

APPOINTMENT ORDER / COURT DECISION

In the light of Peshawar High Court, Bannu Bench decision vide Writ Petition/COC No.111-S/2016, W.P No.387-B/2015,138-B,2014,408-B/2013, the approval of the Departmental Selection Committee constituted by Director Education FATA K.P.K Peshawar order No. 5518-29 dated 16/5/2016 and the review committee of the merit list No.1122-29 dated 09/11/2016, the following candidates are hereby appointed against the vacant post of P/Imam BPS-05 at Rs: (8590-420-21190) Per Month plus usual allowances as admissible under the rules with immediate effect in the interest of Justice /Public Service.

S.N.	Name	Place of Posting	Remarks
1.	Amanullah S/O Haji Marwat Khan	GMS Dumdil Dossali	Vacant Post
2.	Abdul Haq S/O Muhammad Lal Mar	GHS Datta Khel Datta Khel	Vacant Post

Terms & Conditions:

1. His/Her appointments shall be on regular basis in accordance with the Government Policy in vogue.
2. His/Her appointment shall be subject to the provision of medical fitness Certificate issued by the concerned Medical Superintendent.
3. He/She shall be governed under such rules, regulation, orders and ordinances etc relating to appointment and promotion.
4. At any time without notice and without assigning any reason his/her Service Will be Considered Terminated during the period of his/her appointment on probation i.e his/her work during the initial period of one year of services was not found satisfactory.
5. His/Her appointment shall stand cancelled from the date of issue of this order, if his/her documents could not be verified.
6. His/Her salary shall not be drawn till the verification of all the concerned documents/Testimonials.
7. One month prior notice shall be given to the Government in case of resignation or leaving the service.
8. If he/she fail to assume his/her charge within 15 days, his/her order shall be treated as cancelled.
9. He/She will be terminated if he/ her certificates found fake/bogus and tempered.
10. He/She should not be handed over charge if he/she below 18 years and above 35 year of age.

Agency Education Officer
North Waziristan Agency

Ends:- No. 1349-56 Appointment/ P/Imam/AEO/MRN Dated 30/11/2016.

- Copy To:-
1. The Registrar honorable Peshawar High Court, Bannu Bench Bannu.
 2. The Director of Education (FATA) Secretariat Peshawar.
 3. The Political Agent NWA Miranshah.
 4. The Agency Accounts Officer Miranshah.
 5. AAEO Concerned.
 6. Candidate concerned.

Agency Education Officer
North Waziristan Agency

CT (Female)

(33)

OFFICE OF THE AGENCY EDUCATION OFFICER N.W. AGENCY MIRANSHAH

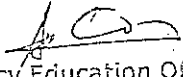
APPOINTMENT ORDER /COURT DECISION

In the light of Peshawar High Court, Bannu Bench decision vide Writ Petition/COC No.111-B/2016, W.P No.387-B/2015,133-B,2014,408-B/2013, the approval of the Departmental Selection Committee constituted by Director Education FATA K.P.K Peshawar order No. 5518-29 dated 16/5/2016 and the review committee of the merit list No.1122-29 dated 09/11/2016, the following candidates are hereby appointed against the vacant post of CT (Female) BPS-09 at Rs: (9860-610-23160) Per Month plus usual allowances as admissible under the rules with immediate effect in the interest of Justice /Public Service.

S: NO	Name	Place of Posting	Remarks
1.	Imtiaza Bibi D/O Haq Amali Khan	GGMS Rafe Gul Kot Mirali	Vacant Post
2.	Umera Begum D/O Syed Rasool	GGMS Atta Muhammad kot Kam Sarobi Tehsil Miranshab	Vacant Post
3.	Suria Naz D/O Sher Nawaz Khan	GGMS Fazal-e-Elani Mirali	Vacant Post
4.	Rubina Marwat D/O Najeebullah	GGHS Pir Aqal Zaman Mirali	Vacant Post
5.	Kamrana Naz D/O Sher Nawaz	GGMS Fazal-e-Elahi Mirali	Vacant Post
6.	Hassina Bibi D/O Rehmatullah	GGMS Darya Jan Dossali	Vacant Post
7.	Kalsum Akhtar D/O Raool Mar Jan	GGMS Gul Zaman Mandi Khel Dossali	Vacant Post
8.	Khalida Sher D/O Sher Khan	GGMS Gul Rauf Kot Datta Khel	Vacant Post
9.	Ahmad Rehana D/O Jabi Ajab Khan	GGMS Muhammad Saleem kot Hamzooni Miranshab	Vacant Post
10.	Basrin Gul D/O Bustan Gul	GGMS Muhammad Jamil Kot Tappi	Vacant Post
11.	Safia Gul D/O Sher Bahadar Khan	GGMS Iran kot Miranshab	Vacant Post

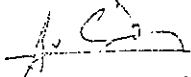
Terms & Conditions

1. His/Her appointments shall be on regular basis in accordance with the Government Policy in vogue.
2. His/Her appointment shall be subject to the provision of medical fitness Certificate issued by the concerned Medical Superintendent.
3. He/She shall be governed under such rules, regulation, orders and ordinances etc relating to appointment and promotion.
4. At any time without notice and without assigning any reason his/her Service Will be Considered Terminated during the period of his/her appointment on probation if his/her work during the initial period of one year of services was not found satisfactory.
5. His/Her appointment shall stand cancelled from the date of issue of this order , if his/her documents could not be verified.
6. His/Her salary shall not be drawn till the verification of all the concerned documents/Testimonials.
7. One month prior notice shall be given to the Government in case of resignation or leaving the service.
8. If he/she fail to assume his/her charge within 15 days, his/her order shall be treated as cancelled.
9. He/She will be terminated if he/ her certificates found fake/bogus and tempered.
10. He/She should not be handed over charge if he/she below 18 years and above 35 year of age.


Agency Education Officer
North Waziristan Agency

Ends:- No. 1286-192 /Appointment/CT(F)/AEO/MRN Dated 30/11/2016.

- Copy To:-
1. The Registrar honorable Peshawar High Court, Bannu Bench Bannu.
 2. The Director of Education (FATA) Secretariat Peshawar .
 3. The Political Agent NWA Miranshab.
 4. The Agency Accounts Officer Miranshab.
 5. AAEO Concerned.
 6. Candidate concerned.


Agency Education Officer

PET (Female) (34)

OFFICE OF THE AGENCY EDUCATION OFFICER N.W. AGENCY MIRANSHAH

APPOINTMENT ORDER / COURT DECISION

In the light of Peshawar High Court, Bannu Bench decision vide Writ Petition/COC No.111-B/2016, W.P No.387-B/2015,138-B,2014,408-B/2013, the approval of the Departmental Selection Committee constituted by Director Education FATA K.P.K Peshawar order No. 5518-29 dated 16/5/2016 and the review committee of the merit list No.1122-29 dated 09/11/2016, the following candidates are hereby appointed against the vacant post of PET (Female) BPS-09 at Rs: (9860-610-28160) Per Month plus usual allowances as admissible under the rules with immediate effect in the interest of Justice /Public Service.

S:NO	Name	Place of Posting	Remarks
1.	Mehnaz Begum D/O Pasta Jan	GGHS Muhammad Amin Kot Shewa	Vacant Post
2.	Sadia Naz D/O Naimatullah	GGMS Khunia Khel Tappi	Vacant Post
3.	Majida Gul D/O Muhammad Farooq	GGMS Badshah Mir Khan kot Khaddi Mirali	Vacant Post
4.	Irum Nabi D/O Hazrat Nabi	GGMS Atta Muhammad Miranshah	Vacant Post
5.	Refat un Nisa D/O Samanadar Khan	GGMS Atta Muhammad Khan Saroobi	Vacant Post

Terms & Conditions

1. His/Her appointments shall be on regular basis in accordance with the Government Policy in vogue.
2. His/Her appointment shall be subject to the provision of medical fitness Certificate issued by the concerned Medical Superintendent.
3. He/She shall be governed under such rules, regulation, orders and ordinances etc relating to appointment and promotion.
4. At any time without notice and without assigning any reason his/her Service Will be Considered Terminated during the period of his/her appointment on probation i.e his/her work during the initial period of one year of services was not found satisfactory.
5. His/Her appointment shall stand cancelled from the date of issue of this order , if his/her documents could not be verified.
6. His/Her salary shall not be drawn till the verification of all the concerned documents/Testimonials.
7. One month prior notice shall be given to the Government in case of resignation or leaving the service.
8. If he/she fail to assume his/her charge within 15 days, his/her order shall be treated as cancelled.
9. He/She will be terminated if he/ her certificates found fake/bogus and tempered.
10. He/She should not be handed over charge if he/she below 18 years and above 35 year of age.

Agency Education Officer
North Waziristan Agency

Ends:- No. 1260-70 / Appointment PET(F)/AEO/MRN Dated 30/11/2016.

- Copy To:-
1. The Registrar honorable Peshawar High Court, Bannu Bench Bannu.
 2. The Director of Education (FATA) Secretariat Peshawar .
 3. The Political Agent NWA Miranshah.
 4. The Agency Accounts Officer Miranshah.
 5. AAEO Concerned.
 5. Candidate concerned.

Agency Education Officer
North Waziristan Agency

OFFICE OF THE AGENCY EDUCATI

APPOINTMENT ORDER / COURT DECISIC

In the light of Peshawar High C
No.111-B/2016, W.P No.387-B/2015,138-B,20
Selection Committee constituted by Director
dated 16/5/2016 and the review committee of th
candidates are hereby appointed against the
(9220-510-24520) Per Month plus usual allowe
effect in the interest of Justice /Public Service.

SN.	Name	PI
1.	Mati Ullah S/O Payo Sardar	GI
2.	Hayatullah S/O Khan Muhammad	GI
3.	Noor Aftab S/O Nek Zaman	GI
4.	Wah Ullah S/O Mir Ajam Khan	GI
5.	Amir Qadam Jan S/O Sardar ullah Jan	GI
6.	Rasool Nawaz S/O Muhammad Rasool	GI
7.	Rizwanullah S/O Noor Khan	GI
8.	Rafiqullah S/O Mir Ajam Khan	GI
9.	Abid Shah S/O Noor Jamal Shah	GI

Terms & Conditions

1. His/Her appointments shall be on regular basis in a
2. His/Her appointment shall be subject to the provis
Medical Superintendent.
3. He/She shall be governed under such rules, regul
and promotion.
4. At any time without notice and without assigning a
during the period of his/her appointment on proba
of services was not found satisfactory.
5. His/Her appointment shall stand cancelled from th
not be verified.
6. His/Her salary shall not be drawn till the verification
7. One month prior notice shall be given to the Govern
8. If he/she fail to assume his/her charge within 15 days
9. He/She will be terminated if he/ her certificates foun
10. He/She should not be handed over charge if he/she be

Ends:- No. 1271-85 Appointment/ I.T Lab:Incha

Copy To:-

OFFICE OF THE AGENCY EDUCATION OFFICER

APPOINTMENT ORDER / COURT DECISION

In the light of Peshawar High Court No.111-B/2016, W.P No.387-B/2015,138-B,2016 Selection Committee constituted by Director Education dated 16/5/2016 and the review committee of following candidates are hereby appointed at Rs: (9860-610-28160) Per Month plus usual allowances with immediate effect in the interest of Justice /Public

SN.O	Name
1.	Zahidullah S/O Gul Zali Khan
2.	Muhammad Yasin S/O Hazrat Khan
3.	Balqiaz Khan S/O Ahmad Khan
4.	Muhammad Sadiq S/O Mir Latif Khan
5.	Nasimullah S/O Amin Noor Khan
6.	Saminullah S/O Muhammad Nek Khan
7.	Samiullah S/O Inayat Khan
8.	Noor Rehman S/O Noor Khan
9.	Rehman Gul S/O Ali Marjan
10.	Kausar Khan S/O Mirabat Khan

TERMS & CONDITIONS

1. His/Her appointments shall be on regular basis in accordance with the rules.
2. His/Her appointment shall be subject to the provisions of the Government Medical Superintendent.
3. He/She shall be governed under such rules, regulations and promotion.
4. At any time without notice and without assigning any reason during the period of his/her appointment on probation of services was not found satisfactory.
5. His/Her appointment shall stand cancelled from the date of the order if not be verified.
6. His/Her salary shall not be drawn till the verification is complete.
7. One month prior notice shall be given to the Government.
8. If he/she fail to assume his/her charge within 15 days of the date of the order.
9. He/She will be terminated if he/her certificates found to be false.
10. He/She should not be handed over charge if he/she be found to be incompetent.

OFFICE OF THE AGENCY EDUCATION OFFICER

APPOINTMENT ORDER / COURT DECISION

In the light of Peshawar High Court Judgment No.111-E/2016, W.P No.387-B/2015,138-B,2016 Selection Committee constituted by Director Education Peshawar dated 16/5/2016 and the review committee of the same dated 16/5/2016 candidates are hereby appointed against the vacancies. The salary shall be Rs. 15000/- Per Month plus usual allowances as admissible to the employees of Government of Justice /Public Service.

SN.	Name	P
1.	Fazal Wali S/O Haji Jalil	G
2.	Asimullah S/O Sakhiu Mar Jan	G
3.	Haseenullah S/O Haqi ur Rehman	G
4.	Khakemin Khan S/O Ismail Khan	G
5.	Muhammad Naveed S/O Muhammad Ayas Khan	G
6.	Zahir Ayub Khan S/O Mir Dal Khan	G
7.	Badshah Zar Khan S/O Said Rauf	G
8.	Rasool Amin S/O Sadat Khan	G
9.	Sherin Muhammad S/O Ghazi Muhammad	G
10.	Sirajullah S/O Fazal Melimood	G
11.	Rehmatullah S/o Sher Badshah	G
12.	Sher Ahmad S/O Ilyas Khan	G

Terms & Conditions

1. His/Her appointments shall be on regular basis in accordance with the rules.
2. His/Her appointment shall be subject to the provisions of the rules and the approval of the Medical Superintendent.
3. He/She shall be governed under such rules, regulations and promotion.
4. At any time without notice and without assigning any reason during the period of his/her appointment on probation of services was not found satisfactory.
5. His/Her appointment shall stand cancelled from the date of the order if the documents are not verified.
6. His/Her salary shall not be drawn till the verification of the documents.
7. One month prior notice shall be given to the Government of Peshawar.
8. If he/she fail to assume his/her charge within 15 days of the date of the order.
9. He/She will be terminated if he/ her certificates found to be false.
10. He/She should not be handed over charge if he/she is found to be ineligible.

OFFICE OF THE AGENCY ED

APPOINTMENT ORDER / COURT I

In the light of Peshawa
No.111-B/2016, W.P No.337-B/2015,
Selection Committee constituted by
dated 16/5/2016 and the review con
following candidates are hereby ap
Rs: (9860-610-28160) Per Month plus L
effect in the interest of Justice /Public

SN.O	Name
1.	Akhtar Ali khan S/o Syed Nek kha
2.	Nomran khan S/oYaseen khan
3	Rahman Zeb S/o Muhammad Rehan
4	Shahidullah S/o Pasti khan
5.	Rasool Jehan khan S/O Riaz Muhammad khan.
6.	Abid ur Rehman S/o Sher Gul
7.	Kausar Iqbal S/O Gul Kem Khan
8.	Ihsanullah S/O Noor Aslam.

Terms & condition:-

1. His/Her appointments shall be on regular
2. His/Her appointment shall be subject to
Medical Superintendent.
3. He/She shall be governed under such
and promotion.
4. At any time without notice and without
during the period of his/her appointment
of services was not found satisfactory.
5. His/Her appointment shall stand cancel
not be verified.
6. His/Her salary shall not be drawn till the
7. One month prior notice shall be given to
8. If he/she fail to assume his/her charge wi
9. He/She will be terminated if he/ her certi
10. He/She should not be handed over the

OFFICE OF THE AGENCY EDUCAT
APPOINTMENT ORDER.

In the lig
decision vide write petition/COC No
No-138-B/2014, NO-408-B/2013 a
committee constituted by Directo
Peshawar Endstt: order No- 5518-2
committee of the Merit List No-112:
NWA approval order No- 1350/EC
Alim Ullah S/O Ghazi Muhammad i
GHS Ali Khel Tehsil Miran Shah
(13510-1120-47110) plus usual all
effect from the date of his taking-ove

TERMS & CONDITION.

- 1- His appointment is made on Ten
time without notice, if he wishe
month prier notice or forfeit one
- 2- He should bring his Health & Ag
AHQ Hospital Miran Shah North
- 3- If he fails to resume his charge
cancelled.
- 4- He should not be handed over cl
of age.
- 5- His original qualifications, date
be checked and photocopy may b
- 6- He will be terminated if his A
fake/Bogus and tempered.
- 7- The appointee is entitled for all b
- 8- His academic/professional Qu
Board/University etc by depos
verification and his salary will
received in this office.

(3)

Showeth,

The Appellant respectfully
Submits by and under

- 1) That the Appellant Petitioner has been working as a P.R.T. Physical Education Teacher (P.R.T.) in Education Department, at Government High School Aho Mueh Mianshah.
- 2) That before appointment the Appellant and other Candidates filed a writ Petition No: 408-10/2013 in the Government High Court, Baroda Bench, for their appointment. Copy of the writ Petition enclosed as A.
- 3) That the case was decided in favour of the Petitioners including the Appellant. Copy of the Court order 10-12-2013 (Copy enclosed as B).
- 4) That the Respondents started delaying tactics, therefore, the Appellant and other workers again the door of High Court Judge CBC No 111-13/2013.

Before the Higher Education Officer, Service In-charge
Punjab

Service Appeal No. ——— / 2020

Alcand Mah. S/o. ~~Yograj~~
Mishra, P.E.T. of ~~Government~~
High School Ati Khat,

R/o Miran Chah District, North
Waziristan ——— Appellant
V/S

① Secretary to the Government of Higher
Education, Elementary & Secondary
Education Department, Civil Secretariat

② District Director, Elementary and Secondary
Education, Miran Chah District,
G.P. Road, Miran

③ District Education Officer (Male)
District Miran Chah, North
Waziristan

④ Ambar Ali (P.R.T)

⑩ Kausar Jahan

⑤ Noorwan Ali

⑪ Mushtaq (P.T)

⑥ Rehman Ali

⑦ Shama Khan

⑧ Rasool Khan

⑨ Muzibur Rehman

→ Respondents

(Copy of C.O.C amended C)
That the Court issued Notice
to the Respondents and as
soon the Respondents were
compelled to issue the Applicant's
order of the writ Petitioner;

B) That the Petitioner was
appointed as P.E.T vide
improved order dated 14-4-2017
(Copy annexed as D) while
other writ Petitioners were
appointed as P.E.T on
30-11-2016 (Copy annexed
as E)

D) That the Applicant submitted
an appeal to the Registrar
No 2 for correction in his
date of appointment so that
he could avail the benefits
of appointment w.e.f 30-11-2016
instead of 14-4-2017.
(Copy of Appeal annexed as
F)

2. As there was upheaval in the administration due to merges of KATA into the Province of Western Kalimantan, therefore the Education Department failed to give any response to the appellant.

3. Short after the merger of K.A.T.A into the Province of Kalimantan, the Department submitted a report to the ~~Department~~ of his province on 14-12-2019.

4. (The Appellant was not given any response for the

5. ~~Department~~ Short due to Corona Virus the offices remained closed and entire country remained under lock down. As such the Appellant could not

6




The appeal is the Tribunal
after the expiry statutory
period of 90 days.

Now when the appeal has
been prepared, the appellant is
filing the appeal
before the Hon. Tribunal
from the address of his residence
with the following documents the
other grounds.

①

Date:

Dossali

قیمت 50 روپے	48254	  
ایڈویکٹ: <u>سید ولایت علی شاہ بخاری</u> بار کونسل ایسوسی ایشن نمبر: <u>ASC</u> رابطہ نمبر: <u>03005919193</u>		
پشاور بار ایسوسی ایشن، خیبر پختونخواہ		

صدر محترم ذوال سوسائٹی پشاور

بعدالت جناب:

مخاطب: <u>ایڈووکیٹ</u>	دعویٰ: <u>سوسائٹی اپیل</u>
<u>علیم اللہ ولد عازم کد</u>	علت نمبر: _____
<u>بنام</u>	مورخہ: _____
<u>سید سید علی احمد</u>	جرم: _____
<u>انڈسٹریل سوسائٹی ایجوکیشنل کورپوریشن</u>	تھانہ: <u>10</u>
باعت تحریر آنگہ	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
 آن مقام کے لئے سید ولایت علی شاہ بخاری کو وکیل مقرر کیا گیا ہے۔
 اس کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقریر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف سے یا اپیل کی برآمدگی اور منسوخی، نیز
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقریر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے
 المرقوم: 16.6.2020



المقام ذوال سوسائٹی پشاور کے لیے منظور ہے۔

علم اللہ و صلوات علیہ وسلم
 رقم ایش ڈی 22701-41-2566

Accepted
 M

Accepted
 Show

"B"

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

No.

Appeal No. 5808 of 20 20

Aleemullah Appellant/Petitioner

Versus

Say do Court of KPK ERSE Peshawar Respondent

Respondent No. 3

Notice to:

Distt: Education Officer (Male)
Distt: Miran Shah, North Waziristan

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 5/11/2020 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

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

Given under my hand and the seal of this Court, at Peshawar this 6/11

Day of Oct 20 20


Registrar

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

P.B

No.

Appeal No. 5808 of 2020

A Iqemullah Appellant/Petitioner

Versus

Syed To Court of K.P.K. E.R.S.E. Peshawar Respondent

Respondent No. 4

Notice to:

AKhtar Ali Khan S/o Syed Naik Khan
(PET) Court High School Muhammad Khel Tehsil
Datta Khel North Waziristan.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 5/11/2020 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 6th

Day of Oct 20 20



Registrar,

) Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

5808
Appeal No. of 20
Aleemullah

Read

Appellant/Petitioner
Secy to Govt. of KPK ERSE Peshawar
Respondent

Respondent No.
Noman Khan S/O Yaseen Khan (PET)
Govt. High School Muhammad Khel
Tehsil Datta Khel Dist. North waziristan.

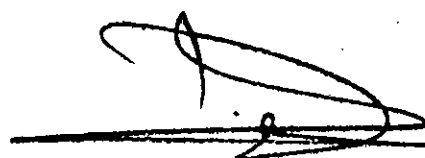
Notice to:

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

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

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated..... 6th

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


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

“B”

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

S.B

No.

Appeal No. **5808** of 20 **20**

Al-eem-ullah Appellant/Petitioner

Versus

Secy to Govt. CF KPK ERSE Peshawar Respondent

Respondent No. **6**

Regd

Notice to:

Rehman Zoh S/O Muhammad Rehman (PET) Govt. High School Lund Datta Khel North Waziristan.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on **5/11/2020** at **8.00 A.M.** If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing **4 copies** of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this **6th**.....

Day of **Oct** 20 **20**

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

P.B

No.

Appeal No. **5808** of 20 **20**

Aleemullah Appellant/Petitioner
Versus

Secy to Court of KPKESE Peshawar Respondent
Respondent No. **7**

Recd

Notice to: —

Shahidullah s/o Pasti Khan (PET)
Court: Middle School Nizam Ko Lakka
Village Dossaki North Waziristan.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on **5/11/2020** at **8.00 A.M.** If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing **4 copies** of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this **6th**.....

Day of..... **OCT** 20 **20**

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Appeal No. 5808 of 20 20

Aleemullah Appellant/Petitioner

Versus

Secy to Govt. of KPK ERSE Peshawar Respondent

Respondent No. 8

Notice to: Rasool Jehan Khan S/O Riaz Muhammad Khan (PET) Govt. Middle School Gardi Rogha Dossali North Waziristan

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 5/11/2020 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 6-15 Day of Oct 20 20

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

P.B

No.

Appeal No. **5808** of 20 **20**

Alpen Uddah Appellant/Petitioner

Versus

Secy to Court of KPK E.S.E. Peshawar Respondent

Respondent No. **9**

Recd

Notice to: —

**Abib us Rehman s/o Sheo (7th) (P.E.T)
Court: High School Tall Village
Mianshah**

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on **5/11/2020** at **8.00 A.M.** If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing **4 copies** of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this **6th**

Day of..... **Oct 20 20**

Registrar,

**Khyber Pakhtunkhwa Service Tribunal,
Peshawar.**

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

“B”

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

No.

Appeal No. **1848** of 20 **20**

Aizemullah

Appellant/Petitioner

Versus

Secy to Court of KPK EXSE Peshawar

Respondent

Respondent No. **10**

Kanooz Iqbal S/o Maul Khan Khan (PET)
Court High School Spulga Miron Shah.

Notice to: —

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on **5/11/2020** at **8.00 A.M.** If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing **4 copies** of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this **5/11**.....

Day of..... **Oct 20 20**

Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

Q.B

No.

Appeal No. 5898 of 20 20

Alaam ullah

Appellant/Petitioner

Versus

Secy to Court: CPK E & SE Peshawar

Respondent

Respondent No. 11

Hisan ullah S/o Noor Alam (PET)
Court: Middle School Saib Jan
Kot Shawa

Notice to:

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 5/11/2020 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this 6th

Day of Oct 20 20

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Appeal No. **5899** of 20 **20**

Ali oem uallah

Appellant/Petitioner

Secy to Govt. of KPK ERSE Peshawar

Versus

Respondent

Respondent No. **1**

Secretary to the Govt. of KPK ERSE Peshawar

Notice to: —

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on **5/11/2020** at **8.00 A.M.** If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing **4 copies** of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

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

Day of.....**Oct 20** 20**20**

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

5899
20/10

کدوائی جیل میں سرروس ٹریڈنگ کے قیام کی درخواست

نمبر

9

علم اللہ سٹیٹ ایڈوائزٹ بیج حکم تعلیم و تربیت

سرروس ایپل نمبر 5898/20

دروازہ نمبر 4، سٹیٹ ایڈوائزٹ، داخل کرنے کی Security and Process fee

میں بے عالی ذمہ سٹیٹ ایڈوائزٹ ٹریڈنگ کے لیے

یہ کہ سرروس ایپل نمبر 5799/20

آج مورچہ 18⁹/₂₀₂₀ تک - سرروس ٹریڈنگ میں زیر تجویز ہے

ایڈوائزٹ ٹریڈنگ کی وزارت سے تعلق رکھتا ہے اور
گزشتہ تاریخ میں کے لئے ٹریڈنگ کی وزارت سے تعلق رکھتا ہے

ایڈوائزٹ ایپل دوران آمد نہ آسکا - لہذا بروقت

Security and Process fee کے لئے ہے

Security and Process fee کے لئے ہے ایڈوائزٹ کے لئے
Process fee کے لئے ہے ایڈوائزٹ کے لئے

علم اللہ دروازہ نمبر

ممبر ایڈوائزٹ کے لئے

Asse M

Before the Honourable Member Khyber
Pukhtoon Khawaz Service Tribunal Peshawar.

Aleem Ullah ----- Appellant-

vs

Secretary to Govt, KPK, Elementary and

Secondary Education, Peshawar Et... Respondent-

Service Appeal No 5799.

Application For Placing on Record.

Some Documents:

1) Respectfully Submitted:

1) The Above Said Service Appeal is Pending
before this Honourable Tribunal For today.

2) The Appellant wants to Place on Record
Merit list/short-list of Trained Male
PET (JOPE) Tehsil Miran Shikr and
Publication in Daily AJS Dated 28⁴
2013.

It is Requested that the above said
Documents may kindly be allowed to be
Placed on file.

Petitioner,

Syed Wilayat Ali Sheh
Advocate s.c. Peshawar

20.7.2020

M.C.

OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY MIRANSHAH
SHORT LIST OF TRAINED MALE PET (JDPE) (Tehsil Miranshah)

1-1

S.No	Name	F/Name	DOB	SSC			FA/F.Sc			BA/B.Sc			MA/M.Sc			JDPE (PET)			Service	Science	Total Score	Remarks
				Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score				
1	Abid-ur-Rahman	Sher Gul	25/4/1985	850	512	12.05	1100	615	11.18	2300	1313	11.42	2000	1382	10.37	1050	689	13.12			58.14	
2	Kausar Iqbal	Gul Kem Khan	1/9/1988	850	445	10.47	1100	751	13.65	550	323	11.75	2200	1336	9.109	1050	631	12.02			57.00	
3	Anwar Ullah	Noor Anwar	10/3/1984	850	494	11.62	1100	572	10.40	550	322	11.71	700	401	8.593	750	465	12.4			54.73	
4	Alim Ullah	Azim Muhammad	20/4/1982	850	426	10.02	1100	455	8.27	550	250	9.09	750	366	7.32	1050	677	12.9		5	52.60	

Ghazi - Muhammad

Habib Ullah Jan
 Member
 (Habib Ullah Jan)
 AAEO, NWA

Hamid Ullah Jan
 Member
 (Hamid Ullah Jan)
 Headmaster, GHS
 Miranshah

Fazal Ghani
 Member
 (Fazal Ghani)
 Superintendent, AEO NWA

Akhtar Niaz
 Member
 (Akhtar Niaz)
 Accountant, AEO NWA

Abdur Razaq
 Member
 (Abdur Razaq)
 Superintendent,
 PA Office

Muhammad Zaveel Wazir
 Chairman
 (Muhammad Zaveel Wazir)
 Agency Education Officer
 North Waziristan Agency


✓

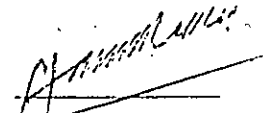
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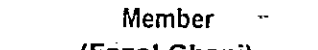
OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY MIRANSHAH


SHORT LIST OF TRAINED MALE DM (Tehsil Miranshah)

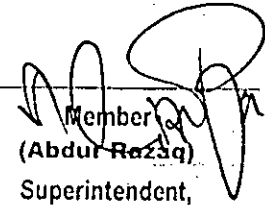
S.No	Name	F/Name	DOB	SSC			FA/F.Sc			BA/B.Sc			MA/M.Sc			DIP			Service	Science	Total Score	Remarks
				Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score				
✓ 1	Zahid Ullah	Gul zali Khan	15/4/1984	850	397	9.34	1100	579	10.53	550	301	10.95	1100	558	7.609	1000	701	14.02			52.44	
✓ 2	Tahir Zaman	Laiq Zaman	12/1/1987	1050	754	14.36	1100	635	11.55	550	293	10.65				1000	701	14.02			50.58	
✓ 3	Suleman Khan	Gul Nawaz Khan	6/2/1979	850	410	9.65	1100	484	8.80	550	283	10.29	1100	512	6.982	1000	686	13.72			49.44	
4	Muhammad Noor Khan	Muhammad Mir Jan	8/2/1989	1050	650	12.38	1400	826	11.80	550	254	9.24				1200	869	14.48			47.90	

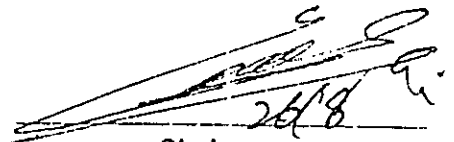

Member
(Habib Ullah Jan)
AAEO, NWA


Member
(Hamid Ullah Jan)
Headmaster, GHS
Miranshah


Member
(Fazal Ghani)
Superintendent, AEO NWA


Member
(Akhtar Niaz)
Accountant, AEO NWA


Member
(Abdul Razzaq)
Superintendent,
PA Office


Chairman
(Muhammad Zaveel Wazir)
Agency Education Officer
North Waziristan Agency

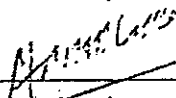
OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY MIRANSHAH

SHORT LIST OF TRAINED MALE CT (Tehsil Miranshah)

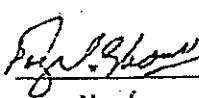
No	Name	F/Name	DOB	SSC			FA/F.Sc			BA/B.Sc			MA/M.Sc			CT			Service	Science	Total Score	Remarks
				Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score				
1	Khakemin Khan	Ismail Khan	13/1/1983	850	580	13.647	1100	746	13.56	550	370	13.45	2400	1480	9.25	1200	848	14.13	5	10	79.05	
2	Hakemin Khan	Ismail Khan	13/1/1983	850	580	13.647	1100	746	13.56	550	370	13.45	2400	1480	9.25	1200	848	14.13		15	79.05	
3	Muhammad Naveed	Muhammad Ayaz Khan	24/5/1987	850	549	12.918	1100	762	13.85	550	330	12.00	1200	818	10.23	900	673	14.96		15	78.95	
4	Qarib Ullah	Hussain Ahmad	23/3/1988	850	513	12.071	1100	685	12.47	550	438	15.93	1200	734	9.175	900	636	14.13		15	78.78	
5	Zabet Ullah	Izzat Khan	20/3/1988	850	530	12.471	1100	708	12.87	550	298	10.84	3300	2405	16.93	900	606	13.47		15	75.58	
6	Rahman Ullah	Badshah Mir Khan	3/3/1980	850	527	12.4	1100	719	13.07	550	343	12.47	1900	1207	9.529	1200	753	12.55		15	75.02	
7	Jan Dad Khan	Habib ur Rehman	2/4/1991	1050	690	13.143	1100	605	11.00	550	286	10.46	2400	1804	11.28	900	630	14		15	74.82	
8	Mashtar Ali Khan	Sierzail Khan	15/3/1983	850	621	14.612	1100	740	13.45	550	330	12.00	2200	1245	8.489	1200	664	11.07		15	74.62	
9	Shahid Ullah	Ghazi Janan	6/3/1989	1050	680	12.952	1100	720	13.09	550	264	9.60	2100	1569	11.21	900	572	12.71		15	74.56	
10	Luqman Khan	Mausel Khan	21/3/1979	850	587	13.812	1100	696	12.65	550	296	10.76	2400	1375	8.594	1200	725	12.08		15	72.91	
11	Noor Aftab	Nek Zaman	9/12/1988	850	574	13.506	1100	729	13.25	2000	1441	14.41	2200	1545	10.53	1700	1255	14.76		5	71.47	
12	Allah Nawaz	Rab Nawaz	1/9/1989	1050	708	13.486	1100	766	13.93	550	333	12.11	1100	593	8.168	1500	989	13.19		10	70.88	
13	Inayat Ullah Khan	Aman Ullah Khan	1/1/1979	850	681	16.024	1100	818	14.87	550	265	9.64	3000	1700	8.82	1500	1230	16.4		5	70.75	
14	Fida Mohammad	Noor Mohammad	1/4/1984	850	575	13.529	1100	675	12.27	550	297	10.80	1100	540	7.364	1500	1132	15.09		10	69.06	
15	Dilawar Jan	Dilbar Jan	2/5/1991	900	721	16.022	1100	788	14.33	550	405	14.73				900	612	13.6		10	68.68	
16	Sahib Noor	Gul Dat Khan	12/12/1979	850	460	10.06	1100	614	12.10	550	267	10.10	1700	934	9.45	1200	707	12.28		15	59.23	


Member
(Habib Ullah Jan)

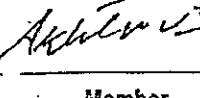
AAEO, NWA


Member
(Hamid Ullah Jan)

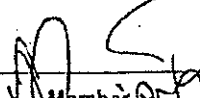
Headmaster, GHS
Miranshah


Member
(Fazal Ghani)


Superintendent, AEO NWA


Member
(Akhtar Niaz)

Accountant, AEO NWA


Member
(Abdur Razaq)

Superintendent,
PA Office

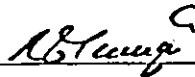

Chairman
(Muhammad Zaveel Wazir)

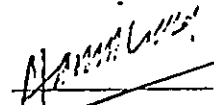
Agency Education Officer
North Waziristan Agency

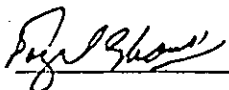
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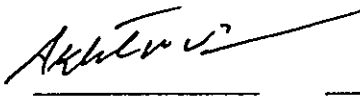
OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY MIRANSHAH
SHORT LIST OF TRAINED MALE CT (Tehsil Miranshah)

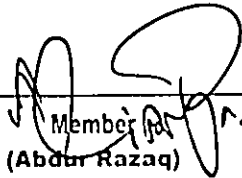
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				Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score				
1	Khakemin Khan	Ismail Khan	13/1/1983	850	580	13.647	1100	746	13.56	550	370	13.45	2400	1480	9.25	1200	848	14.13	5	10	79.05	
1	Hakemin Khan	Ismail Khan	13/1/1983	850	580	13.647	1100	746	13.56	550	370	13.45	2400	1480	9.25	1200	848	14.13		15	79.05	
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5	Rahman Ullah	Badshah Mir Khan	3/3/1980	850	527	12.4	1100	719	13.07	550	343	12.47	1900	1207	9.529	1200	753	12.55		15	75.02	
6	Jan Dad Khan	Habib ur Rehman	2/4/1991	1050	690	13.143	1100	605	11.00	550	286	10.40	2400	1804	11.28	900	630	14		15	74.82	
7	Mazhar Ali Khan	Sherzali Khan	15/3/1983	850	621	14.612	1100	740	13.45	550	330	12.00	2200	1245	8.489	1200	664	11.07		15	74.62	
8	Shahid Ullah	Ghazi Janan	6/3/1989	1050	680	12.952	1100	720	13.09	550	264	9.60	2100	1569	11.21	900	572	12.71		15	74.56	
9	Luqman Khan	Mausel Khan	21/3/1979	850	587	13.812	1100	696	12.65	550	296	10.76	2400	1375	8.594	1200	725	12.08		15	72.91	
10	Noor Aftab	Nek Zaman	9/12/1988	850	574	13.506	1100	729	13.25	2000	1441	14.41	2200	1545	10.53	1700	1255	14.76	5	5	71.47	
11	Allah Nawaz	Rab Nawaz	1/9/1989	1050	708	13.486	1100	766	13.93	550	333	12.11	1100	599	8.168	1500	989	13.19		10	70.88	
12	Inayat Ullah Khan	Aman Ullah Khan	1/1/1979	850	681	16.024	1100	818	14.87	550	265	9.64	3000	1764	8.82	1500	1230	16.4		5	70.75	
13	Fida Mohammad	Noor Mohammad	1/4/1984	850	575	13.529	1100	675	12.27	550	297	10.80	1100	540	7.364	1500	1132	15.09		10	69.06	
14	Dilwar Jan	Dilbar Jan	2/5/1991	900	721	16.022	1100	788	14.33	550	405	14.73				900	612	13.6		10	68.68	

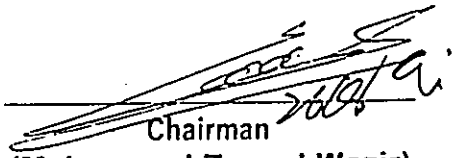

Member
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AAEO, NWA


Member
(Hamid Ullah Jan)
Headmaster, GHS
Miranshah


Member
(Fazal Ghani)
Superintendent, AEO NWA

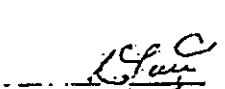

Member
(Akhtar Niaz)
Accountant, AEO NWA

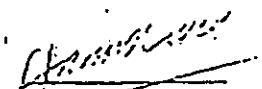

Member
(Abdur Razaq)
Superintendent,
PA Office

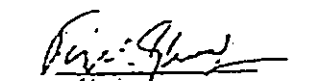

Chairman
(Muhammad Zaveel Wazir)
Agency Education Officer
North Waziristan Agency

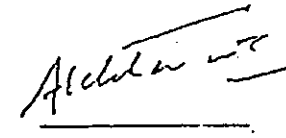
OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY MIRANSHAH
SHORT LIST OF TRAINED MALE LAB ASSISTANT (TEHSIL MIRAN SHAH)


S.No	Name	F/Name	DOB	SSC			FA/F.Sc			BA/B.Sc			MA/M.Sc			Lab Assist			Service	Science	Total Score	Remarks
				Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score				
1	Mujeeb-u-Rehman	Barakat Khan	8/04/1986	850	491	10.10	1100	491	9.67	550	305	12.10									34.11	



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 Accountant, AEO NWA

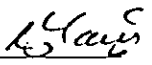

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 (Abdul Razzaq)
 Superintendent,
 PA Office



 Chairman
 (Muhammad Zaveel Wazir)
 Agency Education Officer
 North Waziristan Agency


OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY MIRANSHAH


SHORT LIST OF TRAINED MALE "QARI" (Tehsil Miranshah)

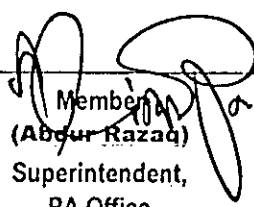
S.No	Name	F/Name	DOB	SSC			FA/F.Sc			BA/B.Sc			MA/M.Sc			Sanad Qirat/ Hfiz Quran Wifaqul Madaris			Service	Science	Total Score	Remarks
				Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score				
1	Ghani Ullah	Ali Bahadar	1/8/1987	900	665	14.78	1100	692	12.58	550	398	14.47	600	480	12.00	100	100	20.00			73.83	
2	Luqman Khan	Ali Haider Khan	18/6/1982	850	446	10.49	600	534	17.80	600	409	13.63	600	392	9.80	100	100	20.00			71.73	
3	Ghulam Hussain	Gul Hussain	15/11/1990	1050	763	14.53	1100	708	12.87	550	319	11.60	2500	1895	11.37	100	100	20.00			70.38	



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Member
(Akhtar Niaz)
Accountant, AEO NWA


Member
(Abdur Razaq)
Superintendent,
PA Office

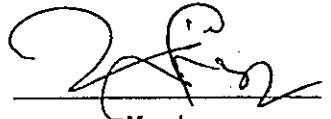

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Agency Education Officer
North Waziristan Agency

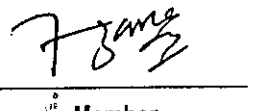
OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY MIRANSHAH
SHORT LIST OF TRAINED FEMALE "IT Lab Incharge" (Tehsil Miranshah)

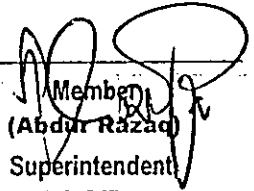
S.No	Name	F/Name	DOB	SSC			FA/F.Sc			BA/B.Sc			MA/M.Sc			DIT			Service	Science	Total Score	Res.
				Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score				
1	Nazia Subhan	Muhammad Subhan	10/9/1982	850	588	13.84	1100	730	13.27	4	3.37	16.85									43.96	DIT
2	Hina Subhan	Muhammad Subhan	1/4/1993	900	793	17.62	1100	901	16.38												34.00	DIT
3	Nazia Sher Ajam	Sher Ajam Khan	13/3/1990	1050	553	10.53	1100	584	10.62	550	289	10.51									31.66	DIT
4	Asia Sher	Malik Muhammad Sher	7/2/1995	1050	693	13.20	1100	704	12.80												26.00	DIT
5	Fatima Zar Gul	Zar Gul Khan	27/2/1989	1050	621	11.83	1100	618	11.24												23.06	DIT



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 Miranshah


 Member
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 AAEO (F), NWA



 Member
 (Farzana)
 GGHS Miranshah NWA

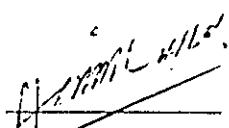

 Member
 (Abdur Razaq)
 Superintendent
 PA Office

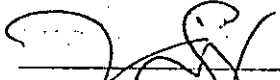

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 Agency Education Officer
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OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY MIRANSHAH 1-
SHORT LIST OF TRAINED FEMALE PET (JDPE) (Tehsil Miranshah)


S.No	Name	F/Name	DOB	SSC			FA/F.Sc			BA/B.Sc			MA/M.Sc			JDPE (PET)			Service	Science	Total Score	Re	
				Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score					
1	Sania Gul	Saeed Muhammad	3/3/1993	900	663	14.73	1100	724	13.16	550	344	12.51				1500	1170	15.60			56.01	Don	
2	Iram Nabi	Hazrat Nabi	17/3/1983	850	375	8.82	1100	628	11.42	550	230	8.36	1100	513	7.00	1050	664	12.65			48.25	Don	
3	Sadia Naz	Naimat Ullah	13/4/1985	850	500	11.76	1100	596	10.84	550	254	9.24				1050	630	12.00			43.84		
4	Rahman Nisa	Jan Ahmad Khan	1/7/1990	900	573	12.73	1100	660	12.00	550	330	12.00										36.73	JD



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 Member
 (Farzana)
 GGHS Miranshah NWA



 Member
 (Abdur Razaq)
 Superintendent,
 PA Office

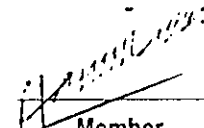

 Chairman
 (Muhammad Zaveel Wa)
 Agency Education Officer
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OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY MIRANSHAH

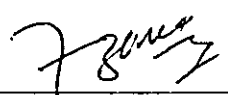
SHORT LIST OF TRAINED FEMALE "CT" (Tehsil Miranshah)

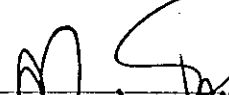
S.No	Name	F/Name	DOB	SSC			FA/F.Sc			BA/B.Sc			MA/M.Sc			CT			Service	Science	Total Score	Remarks
				Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score				
1	Basrin	Bustan Gul	1/11/1989	1050	693	13.20	1100	635	11.55	550	245	8.91	1100	630	8.591	900	602	13.38	5		60.62	In Serv
2	Asma Nawaz	Dil Nawaz Khan	15/9/1988	850	531	12.49	1100	689	12.53	550	252	9.16	2000	1174	8.805	1200	792	13.20	3		59.19	In Serv
3	Ahmad Rehana	Haji Ajab Khan	3/4/1993	900	715	15.89	1100	788	14.33	550	420	15.27				900	563	12.51			58.00	
4	Naurin Naz	Naimat Ullah	10/3/1992	850	694	16.33	1100	711	12.93	550	385	14.00				900	662	14.71			57.97	
5	Kausar Shaheen	Rasool Ghulam	16/6/1982	850	497	11.69	1100	616	11.20	550	294	10.69	900	572	9.533	1200	521	8.68	5		56.80	In Serv
6	Razia Jan	Muhammad Jan	1/1/1989	850	497	11.69	1100	597	10.85	550	267	9.71	1100	552	7.527	900	589	13.09	3		55.87	In Serv
7	Nasrin Rehman	Rahman Sahib	2/5/1985	850	639	15.04	1100	692	12.58	550	283	10.29				900	579	12.87	5		55.77	
8	Safia Gul	Haji Sher Bahadar	15/4/1973	850	588	13.84	1100	464	8.44	550	320	11.64	1100	700	9.545	900	533	11.84			55.30	
9	Khuzada	Mir Dara Jan	14/1/1990	1050	726	13.83	1100	767	13.95	550	385	14.00				900	606	13.47			55.24	
10	Kiran Liaqat	Liaqat Masih	21/3/1989	1050	663	12.63	1100	714	12.98	550	324	11.78				900	628	13.96	3		54.35	
11	Hashmat Ara	Amin Jan	11/4/1983	850	536	12.61	1100	496	9.02	900	610	13.56				900	634	14.09	5		54.27	In Serv
12	Salma Bibi	Haji Ajab Khan	25/4/1978	850	474	11.15	1100	536	9.75	550	253	9.20	1100	590	8.045	900	499	11.09	5		54.23	
13	Asma Bibi	Laiq Zaman	7/2/1987	900	654	14.53	1100	697	12.67	550	368	13.38				900	611	13.58			54.17	
14	Daurana	Mir Dara Jan	12/5/1989	1050	727	13.85	1100	734	13.35	550	379	13.78				900	590	13.11			54.09	
15	Sadia wazir	Mehmood Khan	28/3/1991	900	671	14.91	1100	756	13.75	550	336	12.22				900	593	13.18			54.05	
16	Samrin Abbas	Mir Abbas Khan	23/3/1991	1050	810	15.43	1100	826	15.02	550	369	13.42				900	450	10.00			53.86	
17	Rekhana	Janan Khan	25/6/1900	900	619	13.76	1100	724	13.16	550	363	13.20				900	606	13.47			53.59	
18	Bibi Aisha	Laiq Zaman	10/9/1989	900	630	14.00	1100	664	12.07	550	364	13.24				900	618	13.73			53.04	

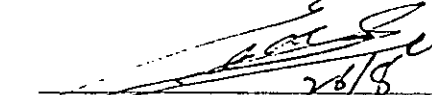

Member
(Habib Ullah Jan)
AAEO, NWA


Member
(Hamid Ullah Jan)
Headmaster, GHS
Miranshah


Member
(Zahida Nawaz)
AAEO (F), NWA


Member
(Farzana)
GGHS Miranshah NWA



Member
(Abdur Razaq)
Superintendent,
PA Office

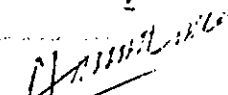

Chairman
(Muhammad Zaveel Wazir)
Agency Education Officer
North Waziristan Agency


OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY MIRANSHAH

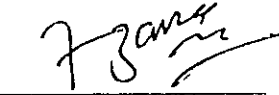
SHORT LIST OF TRAINED FEMALE "Lab Assistant" (Tehsil Miranshah)


S.No	Name	F/Name	DOB	SSC			FA/F.Sc			BA/B.Sc			MA/M.Sc			M.Phil			Service	Science	Total Score	Remarks
				Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score				
1	Asma Khan	Mir Daraz Khan	7/7/1989	850	635	14.94	1100	786	14.29	550	334	12.15	600	410	10.25						51.63	
2	Naila Ayub	Ayub Rahman	1/1/1989	1050	748	14.25	1100	737	13.40	550	352	12.80	1100	660	9.00						49.45	
3	Shazia Afzal	Syed Afzal Khan	20/2/1988	1050	643	12.25	1100	770	14.00	550	320	11.64	1100	636	8.67						46.56	
4	Ahmad Rehana	Ajab Khan	3/4/1993	900	715	15.89	1100	788	14.33	550	420	15.27									45.49	
5	Abida Ijaz Khan	Muhammad Ijaz Khan	5/2/1992	900	683	15.18	1100	746	13.56	550	402	14.62									43.36	
6	Shaista	Malik Maldar Khan	4/4/1992	900	685	15.22	1100	821	14.93	550	363	13.20									43.35	
7	Afsha Hayat	Hayat Ullah	4/4/1988	850	565	13.29	1100	697	12.67	550	242	8.80	1100	593	8.09						42.85	
8	Sadia Anwar	Anwar Khan	1/4/1980	850	471	11.08	1100	627	11.40	550	312	11.35	1100	481	6.56						40.39	



 Member
 (Habib Ullah Jan)
 AAEO, NWA


 Member
 (Hamid Ullah Jan)
 Headmaster, GHS
 Miranshah


 Member
 (Zahida Nawaz)
 AAEO (F), NWA


 Member
 (Farzana)
 GGHS Miranshah NWA

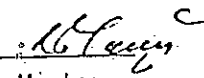

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 (Abdur Razaq)
 Superintendent,
 PA Office

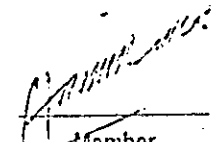

 Chairman
 (Muhammad Zaveel Wazir)
 Agency Education Officer
 North Waziristan Agency


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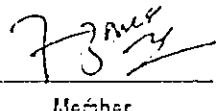
SHORT LIST OF TRAINED FEMALE "QARIA" (Tehsil Miranshah)

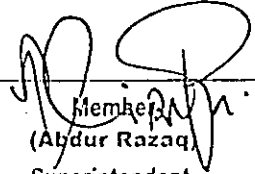
S.No	Name	FName	DOB	SSC			FA/F.Sc			BA/B.Sc			MA/M.Sc			Sanad Qirat/ Hifz Quran Wifaqul Madaris			Service	Science	Total Score	Remarks
				Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score				
1	Aysha	Nazif Khan	30/10/1987	850	446	10.49	1100	703	12.73	550	278	10.11	1100	516	7.036	600	595	19.83			60.20	Hifz req:
2	Khan Gula	Saeed Khan	23/4/1986	850	444	10.45	1100	733	13.42							100	88	17.6			41.47	
3	Sofia Bibi	Damsaz Khan	1/5/1992	1050	681	12.97										100	100	20			32.97	Domicile req:



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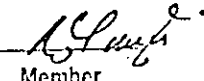

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 (Abdur Razaq)
 Superintendent,
 PA Office

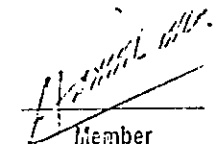

 Chairman
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 Agency Education Officer
 North Waziristan Agency

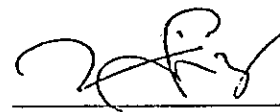
OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY MIRANSHAH

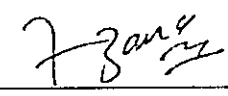
SHORT LIST OF TRAINED FEMALE "QARIA" (Tehsil Miranshah)

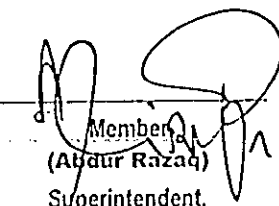
S.No	Name	F/Name	DOB	SSC			FA/F.Sc			BA/B.Sc			MA/M.Sc			Sanad Qirat/ Hfiz Quran Wifaqul Madaris			Service	Science	Total Score	Remarks
				Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score				
1	Aysha	Nazif Khan	30/10/1987	850	446	10.49	1100	700	12.73	550	278	10.11	1100	516	7.036	600	595	19.83			60.20	Hifz req:
2	Khan Gula	Saeed Khan	23/4/1986	850	444	10.45	1100	738	13.42							100	88	17.6			41.47	
3	Sofia Bibi	Damsaz Khan	1/5/1992	1050	681	12.97										100	100	20			32.97	Domicile req:

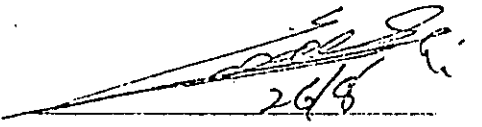

 Member
 (Habib Ullah Jan)
 AAEO, NWA


 Member
 (Hamid Ullah Jan)
 Headmaster, GHS
 Miranshah


 Member
 (Zahida Nawaz)
 AAEO (F), NWA


 Member
 (Farzana)
 GGHS Miranshah NWA


 Member
 (Abdur Razaq)
 Superintendent,
 PA Office

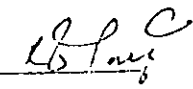

 Chairman
 (Muhammad Zaveel Wazir)
 Agency Education Officer
 North Waziristan Agency

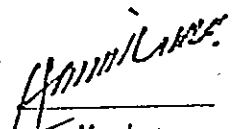
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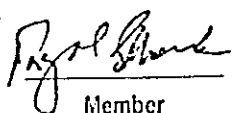


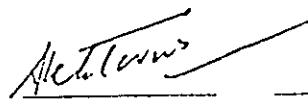
OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY MIRANSHAH
SHORT LIST OF TRAINED MALE IT Lab Incharge (Tehsil Miranshah)

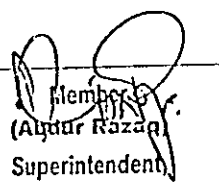
S.No	Name	F/Name	DOB	SSC			FA/F.Sc			BA/B.Sc			MA/M.Sc			DIT			Service	Science	Total Score	Remarks
				Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score				
✓ 1	Wali Ullah	Mir Ajam Khan	3/1/1986	850	582	13.69	1100	727	13.22	2000	1381	13.81	2200	1491	10.17	1700	1192	14.02			64.91	
2	Ghulam Hussain	Gul Hussain	15/11/1990	1050	763	14.53	1100	708	12.87	550	319	11.60	2500	1895	11.37	1700	1124	13.22			63.60	
3	Rahman Ullah	Badshah Mir Khan	3/3/1980	850	527	12.40	1100	719	13.07	550	343	12.47	1900	1207	9.53	1700	1251	14.72			62.19	
✓ 4	Zabit Ullah	Izzat Khan	20/3/1988	850	530	12.47	1100	704	12.80	550	298	10.84	3300	2405	10.93	1700	1101	12.95			59.99	
✓ 5	Rahim Ullah	Abdul Latif Khan	1/3/1989	1050	677	12.90	1100	731	13.29	550	303	11.02	900	445	7.42	1700	1260	14.82			59.44	
6	Muhammad Amir	Muhammad Sultan	22/4/1993	900	691	15.36	1100	721	13.11	550	376	13.67				1400	1119	15.99			58.12	
7	Javed Akhtar	Saif ur Rahman	8/1/1990	1050	720	13.71	1400	879	12.56	1400	713	10.19	1100	587	8.00	1700	1158	13.62			58.09	
8	Khalid Abbas	Sher Gul Khan	11/4/1986	850	499	11.74	1100	665	12.09	550	308	11.20	1800	1098	9.15	1700	1173	13.8			57.98	

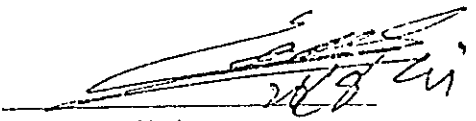

 Member
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 (Hamid Ullah Jan)
 Headmaster, GHS
 Miranshah


 Member
 (Fazal Ghani)
 Superintendent, AEO NWA


 Member
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 Accountant, AEO NWA


 Member
 (Abdur Razzaq)
 Superintendent,
 PA Office

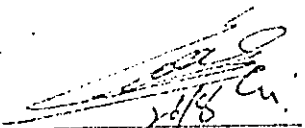

 Chairman
 (Muhammad Zaveel Wazir)
 Agency Education Officer
 North Waziristan Agency

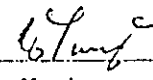
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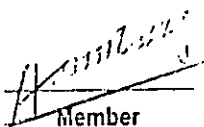
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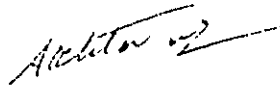
OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY MIRANSHAH
SHORT LIST OF TRAINED MALE AT (Tehsil Miranshah)

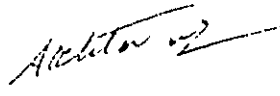
S.No	Name	F/Name	DOB	SSC/Aama			FA/Khassa			BA/Alia			MA/Alamia			Service	Science	Total Score	Remarks
				Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score				
✓ 1	Ghani Ullah	Ali Bahadar	1/8/1987	900	665	14.78	1100	692	12.58	550	398	14.47	600	480	16		57.83		
2	Abdul Ghafoor	Asad Khan	23/1/1970	850	561	13.20	1400	741	10.59	900	540	12.00	1100	633	11.51	5	52.29	In Service	
3	Shakib Ullah	Hamid Ullah	10/2/1990	375	239	12.75	600	419	13.97	600	393	13.10	600	353	11.77		51.58		
✓ 4	Muhammad Usman	Samandar Khan	8/4/1989	375	278	14.83	1100	600	10.91	600	410	13.67	600	339	11.3		50.70		
✓ 5	Abdullah ✓	Mosal Khan	9/1/1981	850	506	11.91	1100	681	12.38	550	337	12.25	600	418	13.93		50.48		
6	Shahid Din	Muhammad Akhtar	1/1/1984	1050	774	14.74	600	354	11.80	600	360	12.00	600	346	11.53		50.88		
7	Abdul Wahid	Mir Nawaz Khan	11/1/1989	1050	674	12.84	1100	619	11.25	600	407	13.57	600	360	12		49.66		
8	Kalim Ullah	Saif ur Rahman	2/9/1982	850	517	12.16	1100	577	10.49	550	310	11.27	1200	638	10.63	5	49.56	In Service	

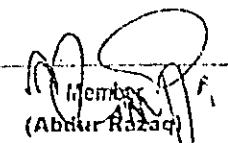

 Member
 (Muhammad Zaveel)
 Agency Education Officer
 North Waziristan Agency

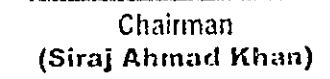

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 NWA


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 Accountant, AEO
 NWA


 Member
 (Abdur Razzaq)
 Superintendent,
 PA Office


 Chairman
 (Siraj Ahmad Khan)
 Political Agent,
 North Waziristan Agency

✓ (19)

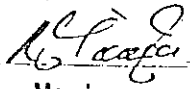
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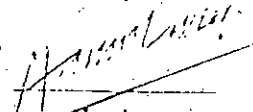
OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY MIRANSHAH

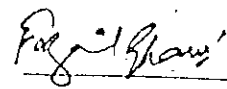
SHORT LIST OF TRAINED MALE PET (JDPE) (Tehsil Miranshah)

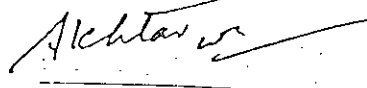
No	Name	F/Name	DOB	SSC			FA/F.Sc			BA/B.Sc			MA/M.Sc			JDPE (PET)			Service	Science	Total Score	Remarks
				Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score	Total Marks	Ob/ Marks	Score				
	Abid ur Rahman	Sher Gul	25/4/1985	850	512	12.05	1100	615	11.18	2300	1313	11.42	2000	1382	10.37	1050	669	13.12			58.14	
	Kausar Iqbal	Gul Kem Khan	1/9/1988	850	445	10.47	1100	751	13.65	550	323	11.75	2200	1336	9.109	1050	631	12.02			57.00	
	Anwar Ullah	Noor Anwar	10/3/1984	850	494	11.62	1100	572	10.40	550	322	11.71	700	401	8.593	750	465	12.4			54.73	
	Alim Ullah	Azim Muhammad	20/4/1982	850	426	10.02	1100	455	8.27	550	250	9.09	750	366	7.32	1050	677	12.9		5	52.60	

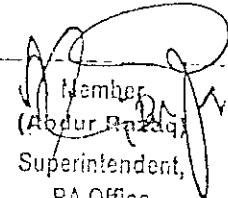
Ghazi - Muhammad

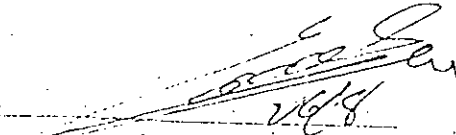

Member
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AAEO, NWA




Member
(Hamid Ullah Jan)
Headmaster, GHS
Miranshah


Member
(Fazal Ghani)
Superintendent, AEO NWA


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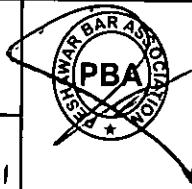

Member
(Abdur Razzaq)
Superintendent,
PA Office


Chairman
(Muhammad Zaveel Wazir)
Agency Education Officer
North Waziristan Agency



28/5/2018

قیمت
50 روپے

99164
محمد نجفی خان



بار کونسل ایسوسی ایشن نمبر: BC 16-6448
رابطہ نمبر: 0332-9915988

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعد اٹ جناب: جسٹس محترم خزانہ سرورہ ٹراٹھمنٹل رولز

منجانب:	دعویٰ: سرورہ ٹراٹھمنٹل
علیہ:	علت نمبر:
مقدمہ:	مورخہ:
جرم:	جرم:
تھانہ:	تھانہ:

باعت تحریر آگے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
آن مقام کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز ذیل صاحب کو
راضی نامہ کرہے نہ و تقریر ثالث و فیصلہ بر حلف دینے جو اہل دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
زیریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
دائر کرنے اپیل اگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ بلائے جائے بغیر کا اختیار ہوگا اور صاحب
مقرر شدہ کو وہی جملہ مذکورہ بالا اختیار حاصل ہوں گے اور اس کا ساختہ پر داخلہ منظور و قبول ہوگا
دوران مقدمہ میں جو خرچہ ہر جاندا تو ائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المقام: 16-6448-BC

مقام کے لیے منظور ہے۔

Accepted

نوٹ: اس وکالت نامہ کی فونو کاپی نام قابل قبول ہوگی۔

Q

محمد نجفی خان

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. 5799/2020

Aleem Ullah S/o Ghazi Muhammad, Physical Education Teacher (PET) of Government High School, Ali Khel, Resident of District Miran Shah, North Waziristan.

..... Appellant

Versus

1. Secretary to Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Civil Secretariat, Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, G. T. Road, Peshawar.
3. District Education Officer (Male), District Miran Shah, North Waziristan.
4. Akhtar Ali Khan S/o Syed Naik Khan (PET) Government High School, Muhammad Khel, Tehsil Datta Khel.
5. Noman Khan S/o Yaseen Khan (PET) Government High School Muhammad Khel, Tehsil Datta Khel.
6. Rehman Zeb S/o Muhammad Rehman (PET) Government High School Lund Datta Khel.
7. Shahid Ullah S/o Pasti Khan (PET) Government Middle School Nizam Kot Lakka Village Dossali.

8. Rasool Jehan Khan S/o Riaz Muhammad Khan (PET) Government Middle School Gardi Rogha Dossali.
9. Abidur Rehman S/o Sher Gul (PET) Government High School Tall Village Miran Shah.
10. Kausar Iqbal S/o Gul Kem Khan (PET) Government High School Spulga Miran Shah.
11. Ihsan Ullah S/o Noor Aslam (PET) Government Middle School Saib Jan Kot Shawa.

..... Respondents

**REJOINDER ON BEHALF OF THE APPELLANT TO THE
COMMENTS OF THE RESPONDENTS NO. 2 AND 3.**

Answers to the preliminary objections:

1. That para No. 1 of the preliminary objection is incorrect and false. The appellant has got cause of action. When legal and valid right of the appellant was intentionally ignored by the respondent department, the appellant had to invoke the jurisdiction of Honourable Tribunal. Moreover, the Hon'ble High Court had decided the writ petition and COC of the appellant in his favour but the respondents No. 1, 2 & 3 badly failed to implement the order of the Hon'ble Court. Therefore, the appellant has locus standi to bring this case before the Hon'ble Tribunal to achieve his due right.

2. That para No. 2 of the preliminary objection is incorrect. The appellant has come to the Tribunal with clean hands while the respondents have not come to the Tribunal with clean hands. The respondents have admitted in their reply (para 4 of the comments) that they could not implement the orders of the Court. From this statement of the respondents, it clearly reflect that they had no regard to the orders of the Hon'ble High Court. Instead of implementing the orders of Court, the respondents indulged in unnecessary inquiries to create delay in issuance of appointment orders. Such an act on the part of the respondents is evident of maladministration on their part. The respondents badly violated the order of the High Court.
3. That para No. 3 of the preliminary objection is totally incorrect. The appellant has a prima facie case which is based on facts. So the appellant is not estopped by his conduct to bring the case before the Tribunal while the respondents are estopped by their conduct to bring their false defence before the Tribunal. It is further added that the private respondent No. 4 to 11 have not given their replies so it means that they are agreed with the appellant.
4. That para No. 4 of the preliminary objection is incorrect and false. The appellant has not concealed any fact or

material from the notice of the Hon'ble Tribunal while the respondents have concealed the actual facts and figures from the notice of the tribunal. There is an established procedure for appointments. When there are vacancies in any department, the advertisement is made through newspaper to fill these vacancies. After written test and interview the merit list is prepared and the candidates are appointed on merit. In the instant case, the Education Department advertised the vacancies of various categories of teachers and other staff of their department to fill the vacancies on regular basis. **(Copy of the advertisement published in the "Daily Aaj" dated 28.04.2013 annexed as "A")**. Test and interviews were conducted but appointments were not made by the respondents. Therefore, against this injustice treatment, the appellant and others had to knock at the door of High Court. The case was decided by the High Court in favour of the petitioners. Even than their orders of appointment were not issued by the respondents. So the appellant and other had to file COC in the High Court. However, the respondents department issued the appointment orders of all the PETs, except the appellant, on 30.11.2016 on regular basis whereas the appellant was appointed as PET on temporary basis on 14.04.2017. From this act of the respondents the injustice and discrimination are clearly evident. The appellant and all the other appointees had qualified

their test and interview for the vacancies of PETs and they had filed the writ petition and COC in the High Court. The judgment and orders of the Court were given in their favour but the respondent's department appointed the appellant on 14.04.2017 instead of 30.11.2016. It shows double standard of the respondents. So they have violated the orders of the Hon'ble High Court. Apart from PETs the other categories of teachers and other staff were appointed on 30.11.2016 while the appellant was given the treatment of step mother by appointing him on temporary basis w.e.f 14.04.2017. Such act on the part of respondents is also violation of the terms and conditions of the service under which vacancies were advertised on 14.04.2013, in which it was clearly mentioned by the Education Department that all the appointments would be made on regular basis. Therefore, the respondents have acted against rules and regulations. The appellant was also entitled for regular appointment with effect from 30.11.2016 but he was deprived of his right without any lawful authority. Therefore, the defence of the respondents is based on malafide intention. They have deprived the appellant of his vested right. It is further submitted that inspite of issuing short list of the PETs in which the appellant is at Serial No. 4, only the appellant was not appointed with effect from the due date i.e. 30.11.2016 while all the other PETs were appointed from the date. The

appellant was appointed on 14.04.2017. So discrimination and injustice are evident.

5. That para No. 5 of the preliminary objection is incorrect. The appeal of the appellant is complete in all respect and it is based on facts and supported by documentary proof. So it deserves to be maintained and decided on merit. The comments of the respondents are false and incorrect so they are liable to be rejected.
6. Incorrect. The appeal has been filed in the Tribunal well in time. The detail has been given in the memo of appeal.

Reply to the comments on facts

- 1 to 3. In reply to para No. 1 to 3 that the respondents have admitted that para No. 1 to 3 are based on record, so para No. 1 to 3 are correct.
4. In reply to para No. 4 that the respondents have admitted their failure in implementation of judgment of the High Court dated 10.12.2015. Therefore, non compliance of the order of the High Court is an act of contempt of court on the part of the respondents. Instead of implementing the order of the Court, the respondents started unnecessary inquiries to create unlawful delay so that the petitioners could suffer.

5. In reply to para No. 5 of the comments, that the respondents have not commented upon para No. 5 of the Appeal. So para No. 5 of the Appeal is correct and admitted.

6. In reply to para No. 6 of the comments that the respondents have admitted that advertisement for filling various vacancies of different cadres of teaching and ministerial staff was made on 28.04.2013. it is pointed out that in the said advertisement, it was clearly mentioned that vacancies shall be filled on regular basis. Therefore, appointment of the appellant made by the respondents on temporary basis on 14.04.2017, is an act of discrimination and unfairness. All the other appointees were appointed on 30.11.2016, on regular basis while the appellant was appointed on 14.04.2017 on temporary basis. As such, he was oppressed and suppressed on the anvil of suppression. Moreover, the shortlist of male P.E.T was issued by the respondents in which the appellant appears at Serial No. 4. The candidates from Serial No. 1 to 3 were appointed on regular basis with effect from 30.11.2016 but the appellant was left high and dry. It is the worst example of injustice. In fact the post of PET is a Districts cadre posts but the respondents have treated the same as Tehsil cadre

post and appointed the appellant on temporary basis on 14.04.2017. It is a glaring case of violation of proper procedure (**The copy of the shortlist is annex. as "B"**). it is further submitted that all the other teachers and ministerial staff were appointed on 30.11.2016, on regular basis whereas the appellant was appointed on 14.04.2017 on temporary basis. Question arises if there was no vacancy then why the appellant was allowed to qualify test and interview and why was he placed at the shortlist? Whether appellant was not a party in the High Court and had the case not been decided in his favour? So, it is highly amazing that all the others were appointed on 30.11.2016, on regular basis while the appellant was appointed on 14.04.2017, on temporary basis. From this unlawful act on the part of the respondents discrimination, biased attitude and injustice are reflecting. The appellant is also entitled to be appointed on regular basis with effect from 30.11.2016, in the light of the orders of the High Court and procedure laid down in the Advertisement.

7. In reply to para No. 7 of the comments that reply of the respondents is irrelevant. The case of the appellant is a prima facie case based on facts and supported by the judgment of the High Court. On the basis of the judgment of the High Court and orders given in COC the respondent department was

compelled to issue the appointment orders of the petitioners. But the respondents gave the treatment of a step mother to the petitioner/appellant. Such an act on the part of the respondents is unjust and unfair. Therefore, the appellant has invoked jurisdiction of Honourable Tribunal against the said injustice.

8. Para No. 8 of the comments is incorrect and false, The appellant submitted the Departmental Appeals before the respondents. The details has been given by appellant in para No. 7, 8 and 9 of the appeal. It was the leniency of the respondents that they failed to give any response to the appellant.
9. In reply to para No. 9 of the comments that the reply of the respondents is totally irrelevant. Before the merger of the tribal areas and after its merger into the province of Khyber Pakhtunkhwa, the appellant filed departmental appeals before the respondents but they badly failed to decide the appeals. It represents maladministration on the part of the respondents.
10. In reply to para No. 10 of the comments that the respondents failed to consider the departmental appeals of the appellant. It reflects the inefficiency on

the part of respondents. They have tried to conceal the facts.

11. Para No. 11 of the comments is incorrect and false. The appellant has a prima facie case and the Hon'ble Tribunal will decide the same on merit.

Reply to the Comments on Grounds:

- A. In reply to para-A of the comments of on grounds, that statement of the respondents is unlawful and against the conditions of their advertisement dated 28.04.2013, under which the respondents were bound to appoint all the successful candidates on merit but the respondents badly failed to appoint the appellant on regular basis w.e.f 30.11.2016 while all the other teachers and other staff were appointed on 30.1.2016. The respondents appointed the appellant w.e.f 14.04.2017, on temporary basis. So it is a glaring case of violation of the orders of the High Court and the conditions highlighted in the advertisement. It is further submitted that the post of PET is a district cadre post and not a Teshil cadre post. If all the other teachers and other staff are appointed on 30.11.2016, then why the appellant had not been appointed by the respondents on regular basis w.e.f

30.11.2016? Therefore, the appointment of the appellant on temporary basis w.e.f 14.04.2017 represents maladministration on the part of the respondents.

- B. In reply to para-B of the comments of on grounds is incorrect and false. The statement of the respondents is biased, malicious and totally unlawful. It was the respondents who had done a great injustice with the Appellant. The detail has been given by the appellant in his appeal and this rejoinder.
- C. In reply to para-C of the comments of on grounds is totally incorrect and false. The appellant has given sufficient detail in his reply to preliminary objections as well as reply to the comments on facts. The respondents themselves have violated the terms and conditions laid down in the advertisement and they also negated the orders of the High Court. Is it not injustice and discrimination that all the candidates were appointed on regular basis w.e.f 30.11.2016 while the appellant was appointed on temporary basis on 14.04.2017? Such an act on the part of the respondents is evident of each and every kind of corruption in Education Department.
- D. In reply to para-D of the comments of on grounds, the statement of the respondents is mocking. The respondents have worked against the law and policy. It

is once again submitted that the post of PET is a district cadre post and not a Tehsil cadre. The respondents could easily appoint the appellant anywhere in his district Miran Shah but they acted against the law and deprived the appellant of his right.

E. In reply to para-E of the comments of on grounds, the respondents have been harping the same song. They have violated rules, regulations and orders of the High Court. The appellant qualified the test and interview for the post of PET and as such he was entitled for appointment as PET on regular basis w.e.f 30.11.2016, but the respondents snatch away his right.

F. In reply to para-F of the comments of on grounds is incorrect and false. The respondents have done great injustice to the appellant, therefore, appellant has come to the Tribunal against the injustice.

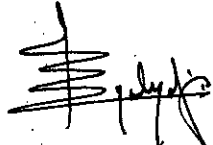
G. In reply to para-G of the comments of on grounds, the appellant has given sufficient detail with proof against the injustice and maladministration on the part the respondents.

H. The statement of the respondents is incorrect.

I. The statement is incorrect. The respondents have tried to conceal their guilt.

J. In reply to para-J of the comments of on grounds, the appellant is also entitled to rely on additional grounds at the time of arguments.

It is, therefore, humbly prayed that the entire defence of the respondents may kindly be declared null and void and the appeal of the appellant may please be accepted, as prayed for.

Appellant
Through 
Muhammad Yahya Khan
Advocate High Court.

Dated: 30.12.2021.

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2020

Aleem Ulalh S/o Ghazi Muhammad, Physical Education
Teacher (PET), of Government High School Ali Khel,
Resident of District Miran Shah, North Wazirstan

.....**Appellant**

VERSUS

1. Secretary to the Government of Khyber
Pakhtunkuwa, Elementary & Secondary Education
Department, Civil Secretariat, Peshawar
2. Director, Elementary & Secondary Education,
Khyber Pakhtunkhwa, G.T Road Peshawar
3. District Education Officer (Male), District Miran
Shah, North Wazirstan.
4. Akhtar Ali Khan S/o Syed Naik Khan, (PET)
Government High School Muhammad Khel, Tehsil
Datta Khel
5. Nomran Khan S/o Yaseen Khan (PET) Government
High School Muhammad Khel, Tehsil Datta Khel
6. Rehman Zeb S/o Muhammad Rehan (PET)
Government High School Lund Datta Khel,
7. Shahid Ullah S/o Pasti Khan (PET) Government
Middle School Nizam Kot Lakka Village Dossali.
8. Rasool Jehan Khan S/o Riaz Muhammad Khan
(PET) Government Middle School Gardi Rogha
Dossali

9. Abid ur Rehman S/o Sher Gul (PET) Government High School Tall Village Miranshah
10. Kausar Iqbal S/o Gul Kem Khan (PET) Government High School Spulga Miran Shah
11. Ihsan Ullah S/o Noor Aslam (PET) Government Middle School Saib Jan Kot Shawa

.....Respondents

**APPEAL U/S 4 OF KHYBER
PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974, AGAINST
THE IMPUGNED ORDER OF THE
RESPONDENT NO. 3 DATED
14/04/2017, WHEREBY THE
APPELLANT HAS NOT BEEN
APPOINTED FROM THE CORRECT
AND PROPER DATE AND THE
NON DECISION OF THE
RESPONDENTS NO. 1 TO 3 ON THE
DEPARTMENTAL APPEALS OF
THE APPELLANT DATED
05/04/2018 AND 14/12/2019**

Prayer in appeal:-

Accepting the appeal of the Appellant, the Respondents No. 1 to 3 may be ordered to make necessary amendment/correction in the date of appointment of the Appellant, so that his appointment could take effect from 30/11/2016.

Sheweth:-

The Appellant respectfully submits as under:

1. That the Appellant has been working as a Physical Education Teacher (PET) in Education Department at Government High School Ali Khel, District Miran Shah.
2. That before appointment the Appellant and other candidates filed a Writ Petition (W.P No. 408-B/2013 in the Peshawar High Court Bannu Bench, for their appointments. **(Copy of the writ petition is annexed as ~~annexure~~ A)**
3. That the case was decided in favor^u of the petitioners including the appellant. **(Copy of the court order dated 10/12/2015 annexed as ~~annexure~~ B)**
4. That the Respondents started ^{dilly dallying} daily dialing in the implementation of the Court's order, therefore, the Appellant and the others knocked again at the door of High Court through COC No. 111-B/2016. **(Copy of COC is annexed as ~~annexure~~ C)**
5. That the Court issue^d Notice to the Respondents and as such the Respondents in COC were compelled to issue the appointment orders of the writ petitioners.
6. That the Appellant/petitioner was appointed as PET vide impugned order dated 14/04/2017. **(Copy of the order is annexed as ~~annexure~~ D)**, while the other writ Petitioners were appointed as PET on 30/11/2016. **(Copy of the order annexed as ~~annexure~~ E)**
7. That the appellant submitted an appeal to the Respondent No. 2 for correction in his date of appointment so that he could avail the benefit of appointment w.e.f. 30/11/2016 instead of 14/04/2017. **(Copy of the appeal is annexed as ~~annexure~~ F)**
8. As there was upheaval in the Administration as the merger of FATA into the province of Khyber

Pakhtunkhwa was under way, therefore, the Education Department failed to give any response to the Appellant.

9. That after the merger of FATA into the province of Khyber Pakhtunkhwa, the Appellant submitted ~~an~~^a Departmental Appeal to the Respondent No. 2 for the redress of his grievance on 14/12/2019. **(Copy of the departmental appeal annexed as ~~annexure~~ G)**
10. That the Appellant was not given any reply from the concerned authority.
11. That due to Corona Virus the offices remained closed and the entire country remained under locked down. As such the Appellant could not file the appeal in the Tribunal after the expiry of statutory period of 90 days. Now when the offices have been re-opened, therefore, the Appellant is filing this Appeal before the Hon'ble Tribunal for the redress of his grievance on the following amongst the other grounds.

Honourable

GROUND S:-

- A. That the impugned order dated 14/04/2017 passed by the Respondent No. 3 is the worst example of discrimination and injustice. It is worth mentioning that other petitioners in the writ petition No. 408-B/2013 were appointed against their posts on 30/11/2016, whereas the Appellant was appointed on 14/04/2017. So it represents mal-administration on the part of the Respondent No. 3.
- B. That non-decision on the departmental appeals of the Appellant by the Respondents No. 1 to 3 represents inefficiency, ignorance and malafide intentions on their part.

- C. That on account of appointing the Appellant w.e.f. 14/04/2017, the Respondents have given a severe loss to the appellant. If the date of his appointment is not corrected, the Appellant will ~~defiantly~~ ^{lose} his seniority and chances of promotions. *definitely*
- D. That private Respondents No. 4 to 11 were also the petitioners in Writ Petition No. 408-B/2013 alongwith Appellant, if they are appointed on 30/11/2016 than why the Appellant has not been appointed from the same date? The Respondents No. 1 to 3 have done great injustice to the Appellant, As a result of ~~their~~ ^{this} unlawful act, the respondent No. 4 to 11 will surpass the Appellant in seniority and they will also get chances of promotion by kicking back the Appellant.
- E. *Apart* ~~A part~~ from Physical Education Teachers, the other categories of teachers were appointed on 30/11/2016, while the Appellant was appointed on 14/04/2017, So discrimination, injustice and mal-administration on the part of Respondents No. 1 to 3 (especially Respondent No. 3) are evident. *(Copy of appointment order of various categories of teachers enclosed as H)*
- F. That the Respondents No. 1 to 3 have not decided the departmental appeals of the appellant which shows that they have made up their mind to cause harm and irreparable loss to the Appellant in future.
- G. That the Respondents No. 1 to 3 are *legally* bound to correct the date of appointment of the appellant as 30/11/2016 by making necessary amendment /correction in the impugned order dated

14/04/2017, So that the Appellant may not be deprived of his rights.

H. That the Appellant shall also rely on the additional grounds after filing the written statement by the Respondents.

I. In the light of the above the impugned order dated 14/04/2017 is liable to be set aside or modified and the non decision on the part of the Respondent No. 1 to 3 are liable to be declared null and void.

J. That any other ground may be raised at the time of arguments, with the kind permission of this Honourable Tribunal.

It is humbly prayed that accepting this appeal in favour of the Appellant and against the Respondents with cost, by setting aside ^{or modifying the} the impugned order dated 14/04/2017, the Respondents No. 1 to 3 may kindly be ordered to make changes in the date of appointment of the Appellant, so that the Appellant could be treated appointed w.e.f. 30/11/2016.

Appellant

Through

Ali
Syed Wilayat Shah

Advocate, ~~High Court~~

Peshawar

Date: 16/06/2020

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No. 5808/2020

Aleem ullah S/O Ghazi Muhammad, Physical Education Teacher (PET) Government High School Ali Khel, R/O District North Waziristan.

Appellant


VERSUS

1. Secretary Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar and others.

Respondents

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ASSISTANT DISTRICT EDUCATION OFFICER
NORTH WAZIRISTAN TRIBLE DISTRICT

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

Appeal No. ⁵⁸⁰⁸~~5809~~/2020

Aleem ullah S/O Ghazi Muhammad, Physical Education Teacher (PET) Government High School Ali Khel,
R/O District North Waziristan. _____ Appellant

VERSUS

1. Secretary Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male), District North Waziristan at Miran Shah.
4. Akhtar Ali Khan S/O Syed Naik Khan, (PET) Government High School Muhammad Khel, Tehsil Datta Khel.
5. Nomran Khan S/O Muhammad Rehman (PET), Government High School Muhammad khel, Tehsil Datta khel.
6. Rehman Zeb S/O Muhammad Rahman (PET) Government High School land Tehsil Datta khel.
7. Shahid ullah S/O Pasti Kahn (PET), Government Middle School Nizam kot lakka Village Dossali.
8. Rasool Jehan Kahn S/O Riaz Muhammad Khan (PET) Government Middle School Gardi Rogha Dossali
9. Abid Rehman S/O Sher Gul (PET) Government High School Tall Village Tehsil Miran Shah.
10. Kausar Iqbal S/O Gul kem Khan (PET) Government Middle School Sahib Jan Kot Shewa.

_____ Respondents

Para wise Comments on behalf of Respondent No. 2 & 3

Respectfully Sheweth:

Preliminary Objections:

1. That the appellant has got no cause of action, locus standie to file the instant appeal.
2. That the appellant has not come to this Honorable Tribunal with clean hands.
3. That the appellant has estopped by his own conduct to bring the instant appeal.
4. That the appellant has concealed material facts from the Honorable Tribunal.
5. That the appeal is not maintainable in the present form.
6. The appeal is badly time barred

On facts:

1. Pertain to record.
2. Pertain to record.
3. Pertain to record.
4. The respondent No. 3 could not implement the judgment issued by the Honorable Court on 10.12.2015 as because the department was to issue revised merit list under the compliance of the inquiry committee constituted by the FATA Secretariat (Copy of the inquiry committee is attached as Annexure-A). The merit lists were issued on 20.08.2016.
5. No comments.

- On 28.04.2013 the Agency Education officer (The respondent No. 3) advertised various vacant posts of CT, TT, AT, DM, PET Qari/Qaria, Pesh-Imam, lab: Asstt: I.T. Lab: In charge, Warden Women Teachers Hostel and J/ clerk male & female, for appointment in Different tehsils of North Waziristan. For that purpose tests were given to the candidates and after interviews, merit lists were prepared and some of the appointments orders were issued as well. In the meantime, the Ex- Political Agent North Waziristan Agency took all the record in his custody when irregularities and mal-practices in the recruitment process were registered in the complaint cell of his office and also in some of the National Dailies. As a result, the merit lists were declared null and void and appointment orders were cancelled. **(Copy of the Political Agent order is attached as Annexure-B)** He wrote a letter to the FATA Secretariat for departmental inquiry about the recruitment which nominated a high level inquiry committee to probe the matter and endorsed the decision of the Political Agent and directed a Departmental Selection Committee to re-evaluate the educational testimonials/ degree etc of the candidates and made a revised merit lists for appointment **(Copy of the Inquiry Report is attached as Annexure-A)**. In this way the revised merit lists for PET for different Tehsils, especially for tehsil Miran Shah, the Tehsil of the appellant, was issued on 20.08.2016. According to the merit list for PET, the appellant was on S. # 4. **(PET merit list attached as Annexure-C)** The first 3 candidates were appointed on 30.11.2016 on the available vacant seats in tehsil Miran Shah while the appellant was appointed on 14.04. 2017 upon the availability of vacant PET post at GHS Ali khel.
7. The same nature of case was filed by the appellant through a W.P. No.286-B/2018 titled Rafiq ullah, Irum and Aleem ullah VS Secretary Home and others, in the Peshawar High Bannu bench, was dismissed by the Honorable Court (**Court Judgment is attached as Annexure- D**).
 8. Denied on the ground that no such appeal has been submitted before the respondent department.
 9. No such appeal is under consideration by the respondent No. 3.
 10. No such appeal was under consideration.
 11. The instant appeal may kindly be dismissed on the following grounds.

Grounds:

- A. Incorrect. The appellant was on S. # No. 4 in the merit list. The first 3 candidates got appointment orders against vacant positions while the appellant was issued appointment order on 14. 04. 2017 as up to that date, no vacant position of PET was available in his Tehsil.
- B. The plea of the petitioner for back benefit is un-lawful on the basis of no works no pay.
- C. The candidates who had better position in the merit list were appointed as per merit policy. No vacancy was available for the appellant at that time as his merit position was below in the merit list. Allegation of the petitioner is baseless in terms of rules and policy.
- D. The respondent No. 4 to 11 were on merit at descending order in their respective Tehsils. They were appointed on available vacancies as per policy while the appellant was appointed on 14. 04.2017 as and when a vacant position of PET was available at his tehsil Miran Shah.
- E. All such candidates of other categories were appointed on the available vacancies in accordance with merit/ policy without any discrimination while there was no available vacancy of PET for the petitioner in Tehsil Miran Shah up to 14.04.2017.
- F. It is against the law and rule to change the date of appointment of the petitioner from 14.04. 2017 to 30. 11. 2016 at the belated stage.


G. As elucidated in Para-F above.

H. Incorrect.

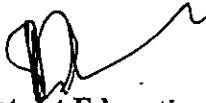
I. Incorrect.

J. That the respondents seek permission to put forward additional points at the time of arguments.

Respondent No. 2


Director Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar


Respondent No. 3


District Education Officer
North Waziristan Tribal district
FOT

AFFIDEVIT

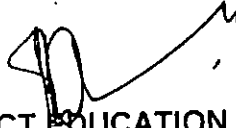
I, Mr. M. Faisal Focal person for litigation, Education Office North Waziristan Tribal District do hereby solemnly affirm and declare that all the contents of the accompanied appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Honorable Tribunal




DEPONENT

AUTHORITY LETTER

It is stated that Mr. M. Qureshi has been working as Focal person for litigation in the office of District Education Officer. He has been given the authority to attend any kind of court cases. So he may be considered as representative of the District Edu: officer, North Waziristan Tribal District.


DISTRICT EDUCATION OFFICER
NORTH WAZIRISTAN TRIBLE DISTRICT

M B T
FATA SECRETARIAT

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15/12/16

Inquiry against Ex-Agency Education Officer
North Waziristan Agency

Attested
15/12/16

Conducted by

- 1. Mr. Arshad Majeed Mohmand, Secretary FIFA, FATA Sect.
 - 2. Mr. Muhammad Suleman, Dy. Secretary Finance, FATA Sect.
 - 3. Mr. Muhammad Fayyaz, Principal Govt Degree College, Ghiljo, Orakzai
- 17-Dec-13

This is an inquiry conducted against the Ex-AEO, NWA in the accusations of involvement in malpractices during the recruitment process of 200 posts in the NWA education office.

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Agency Education Officer
North Waziristan Agency

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1. Introduction.

In compliance with the remarks of the Secretary Social Sectors Department, FATA Secretariat, an Inquiry Committee was constituted on 18.11.2013, to probe into the matter of irregular appointments made by Mr. Muhammad Zaveel Wazir, Ex-Agency Education Officer North Waziristan Agency vide notification No S.O (FATA) EDU/1-30/NWA/2747-53 dated 18-11-2013 (Annex-I). The committee comprised of the following.

- 1.1) Mr. Arshad Majeed Muhammad, Secretary FATA FATA Secretariat Peshawar.
- 1.2) Mr. Muhammad Suleiman Khattak, Deputy Secretary Finance FATA Secretariat.
- 1.3) Mr. Muhammad Fayyaz, Principal Govt Degree College Ghiljo Orakzai.

2. Background

Agency Education Office of North Waziristan had advertised job openings for various categories of posts including: CI, PI I, DM, AT, IT, Palsh Iniam, Junior Clerk, Lab Assistant, IT Lab In-Charge & Warden Women Teachers Hostel (advertisement Annex-I).

These posts were advertised on 28.04.2013, under the name of Mr. Muhammad Zaveel Wazir, Agency Education Officer, North Waziristan who was also the designated officer in charge of the recruitment process. The interview process began on 18-06-2013 for the posts of AT-BPS 11 and ended on 10-07-2013 for the posts of Warden Women Teachers Hostel. A departmental selection committee was constituted to complete the process of recruitment. The selection committee comprised of the following officials.

- | | |
|------------------------------------------|------------------------|
| 1. Political Agent NWA | Chairman for BPS 11-15 |
| 2. AEO NWA | Chairman for BPS 1-10 |
| 3. Mr. Hameedullah Jan H/M GHS Miranshah | Member |
| 4. Mr. Abdur Razzaq Supdt PA office | Member |
| 5. Mr. Habibullah AAEO AEO office | Member |
| 6. Mr. Akhtar Niaz Accountant AEO Office | Member |
| 7. Mr. Fazal Ghani Supdt AEO Office | Member |
| 8. Ms. Zahida Nawaz AAEO AEO Office | Member |
| 9. Mr. Farzana GHS Miranshah | Member |

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31/1/13

Agency Education Officer
North Waziristan Agency

A-4

Prof. - 1

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27 appointment orders were issued under different categories of advertized vacancies on 28-08-2013. A number of public complaints were raised against Mr. Muhammad Zaveel Wazir in lieu of the recruitment procedure adopted and followed by him, with regards to the advertized posts. Political Agent North Waziristan agency, taking cognizance of the complaints, declared all the issued appointment orders null and void on 21/9/13 via letter no 3991-99/5 to Director Education FATA, and proceeded to take all the relevant office record in his custody.

In pursuance of the above mentioned facts the Political Agent NWA informed FATA Secretariat and requested for initiation of an inquiry against Mr. Muhammad Zaveel Wazir, on the basis of the following allegations (Annex-III):

- 2.1) A number of complaints were received in the complaint cell established by the Political Administration of NWA, against the recruitment process undertaken by Ex-AEO Mr. Muhammad Zaveel Wazir in the above mentioned posts. Some of the received complaints are as follows:
- 2.2) Although a committee was constituted for verification of received certificates/degrees of candidates, no such verification was undertaken by the committee or the Ex-AEO.
- 2.3) Ex-AEO was alleged to have taken bribes for recruiting against the advertized posts, undermining the transparency and merit of the process.
- 2.4) The same complaints of non verification of certificates/degrees by the Ex-AEO were raised in public jirgas arranged by the Political Agent NWA. It also came to the notice of Political Agent that in spite of his instructions to the contrary, appointment letters were issued by Mr. Baitullah, Assistant Education Officer NWA with the assistance of office assistant Akhter Niaz in back dates, after the Ex-AEO was posted out.
- 2.5) It has been confirmed by the current AEO that records of appointment orders issued by the Ex-AEO were not available in the education office of NWA, which is a clear violation of government rules and regulations. Moreover It is also alleged that services of computer operator Mr. Rafidullah, serving in the election commission office Miranshah, were employed by the Ex-AEO in lieu of the services of Mr. Baitullah who was the designated computer operator for the Agency Education Office, NWA. It may reflect unfair intention of the Ex-AEO to hide the facts related to the recruitment process of the advertized posts.
- 2.6) Since Ex-AEO is a grade 18 officer, the political administration is not competent to conduct inquiry against the concerned official. The political agent has therefore, requested the Secretary, Social Sector Department, FATA Secretariat,

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24/10/13

Agency Education Officer
North Waziristan Agency

to constitute an inquiry committee to investigate the allegations leveled against Mr. Muhammad Zaveel Aziz, Ex-AEO in connivance with Mr. Habibullah, Assistant Agency Education Officer NWA, and Mr. Akhther Niaz, Assistant Directorate of Education FATA, taking action on the report of Political Agent North Waziristan, moved a note to the Additional Chief Secretary FATA through Secretary Social Sectors FATA, requesting for constitution of an inquiry committee to conduct impartial inquiry into the complaints and alleged irregularities into the appointment orders issued by the then Agency Education Officer, North Waziristan Agency.

3. Issues

- 3.1) Muhammad Zaveel, the then Agency Education Officer NWA and his subordinates/officers/officials have not bothered to verify documents of the candidates before appointment against the posts of teachers in various categories and scales.
- 3.2) They have allegedly violated the merit policy in recruitment of teaching staff in NWA and received bribes for irregular appointments.
- 3.3) The merit list of candidates has allegedly been prepared on bogus documents of candidates against the existing merit policy which amounts to high level of dishonesty.

4. Proceedings

- 4.1) The Inquiry committee held its first meeting on 22-11-2013. Committee examined the case and issues framed for the inquiry committee. The committee also decided to include the issue of appointment during the ban period.
- 4.2) In order to proceed with the inquiry a letter No. FS/FIFA/General/09/2013-14/370-73, dated: 19/11/2013 (Annex-IV) was sent to Director Education FATA, wherein Director Education was directed to submit all relevant documents to the office of Secretary FIFA for further proceeding. Director Education attended the office of Secretary FIFA on 20.11.2013 & submitted relevant documents to the Secretary FIFA.
- 4.3) A letter No. FS/FIFA/General/09/2013-14/378-79, dated: 20/11/2013 (Annex-V) was addressed to Director Education to depute a well conversant officer to attend the office of Secretary FIFA on 22.11.2013.
- 4.4) On 21.11.2013 a letter No. FS/FIFA/General/09/2013-14/382, (Annex-VI), addressed to Political Agent North Waziristan was dispatched, requested him to

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Agency Education Officer
North Waziristan Agency

submit all relevant documents along with a well conversant officer to appear before the inquiry committee. To this Mr. Zaheer Ud Din, APA North Waziristan Agency attended the office of Secretary FIFA without proper record. The APA North stated by arguing that documents of all candidates is in the custody of PA North. He submitted only General List & some appointment orders.

4.5) Another letter No. FS/FIFA/General/09/2013-14/383, Dated: 22.11.2013, was sent to Director Education asking him to direct Mr. Zaveel Wazir, the then Agency Education Officer North Waziristan Agency to attend the office of Secretary FIFA. Mr. Zaveel attended the office of Secretary FIFA & recorded his statement before the committee. (Annex-VII).

4.6) On 06.12.2013 the Assistant Political Officer, Miranshah was contacted through phone to arrange for complainant candidates to attend the office of Secretary FIFA on 09.12.2013. On 09.12.2013, 06 candidates from different Tehsils of North Waziristan Agency attended the office of Secretary FIFA. They were interviewed and their view points were noted. Names of the candidates are as follows:-

1. FAZAL WALI S/O HAJI JALIL, CT (MIRAN SHAH).
2. KHAKEMIN KHAN S/O ISMAIL KHAN, CT (MIRAN SHAH).
3. ALIM ULLAH S/O GHAZI MUHAMMAD, PET (MIRAN SHAH).
4. HASIN ULLAH S/O KHALIL UR RAHMAN, CT (MIR ALI).
5. ASIM ULLAH S/O SAKHI MARJAN, CT (MIR ALI).
6. ABID UR RAHMAN S/O SAHAR GUL, PET (MIRAN SHAH).
7. RAFIQ ULLAH S/O MIR NAIM KHAN, ITI & INCHARGE (MIR ALI).

4.7) Director Education was asked to clarify the directorate position with reference to receipt of letter regarding imposition of ban and its dispatch to field formations vide letter no. FS/FIFA/General/09/2013-14/422 dated 02-12-2013 (Annex-VIII). Director of Education reply is placed at (Annex-IX).

5. Statements/ Defense of the accused

The accused Mr. Muhammad Zaveel Wazir has submitted a detailed statement which is (Annex-X). Key points of the statement are as follows

- 5.1) The Ex- AEO denied all the allegations leveled against him.

Agency Education Officer
North Waziristan Agency

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- 5.2) The accused admitted that he had displayed a merit list on 26-08-2013 and had issued 27 appointment orders on 28-08-2013.
- 5.3) The accused claimed that he did so because he wanted to vent some of the incessant pressure that he had to face from different quarters during the recruitment process.
- 5.4) The accused also claimed that he had completed the recruitment process including interviews on 28-08-2013. Until then his office had not received any notification from the Directorate of Education informing about the imposed ban on recruitment. He did undertake the process of recruitment without having any knowledge of the relevant ban.

6. Findings

According to recruitment's policy notification No. SO (PE) 45/SARC/2012 /TEACHING CADRE, dated 13th November 2012 (Annex-XI).

- 6.1) "The merit list prepared by the concerned appointing authority shall be displayed for ten (10) days to receive the objections/appeals, if any, and shall issue the final merit list after making necessary corrections while addressing the observations/objections/appeals, followed by requisite appointment orders".

However, in clear violation of the above laid down policy, the then Agency Education Officer North Waziristan Agency, Mr. Zaveel Khan, displayed merit list for only two days and issued appointment orders without giving any opportunity for the appeals/objections to be redressed.

Had policy been followed in letter & spirit, all complaints/appeals/objections would have been entertained in time and necessary corrective measures would have been taken.

Adherence to policy would have made the process transparent and fair. Inquiry Committee rejects flimsy explanation given by the then Agency Education Officer and find his guilty of mis-conduct.

- 6.2) Mr. Mohammad Zaveel Khan and his subordinates Officers/Officials have also been accused of not bothering to verify the documents of candidates before appointment against the post of various categories & scales.

The Committee examined the issue in detail. According to the policy (Annex-XII): "the concerned appointing authority will scrutinize and verify the documents

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and make the appointments as per prescribed rules and will get the documents verified after the issuance of appointment orders within the shortest possible time not exceeding ninety (90) days".

As per policy, documents of all candidates are scrutinized after appointment orders are issued. However, immediately after issuance of twenty seven (27) appointment orders, Political Agent upon complaints of local people, seized all the record of the candidates, followed by the transfer of the then Agency Education Officer. The record is still in the custody of Political Administration.

Hence the accusation of not verifying the documents before appointment is out of place and at variance with the policy which requires verification after issuance of appointment orders.

- 6.3) Federal Government imposed ban on recruitment in Federal Ministries /Divisions /Autonomous Bodies /Corporations on 20th June 2013, vide notification no. F.NO/4/1/93-R-1 (Annex-XIII). The same was endorsed by FATA Secretariat to all Heads of Line Departments vide letter No. FS/E/100-20(NA)/5677-81, dated 15th July 2013.

Directorate of Education endorsed the same to all the Agency Education Officers vide endorsement No. 17995-18004 Peshawar dated 17th September 2013.

It is clear that all recruitments were made during the ban period, and the information regarding ban appeared in both print and electronic media. The processes of recruitment during ban cannot be justified due to some bureaucratic lapse.

- 6.4) As per normal practice in the government offices for hiring junior clerks, a typing test is conducted in such a manner that 3 or 5 minutes are allocated to the applicants to complete a given written paragraph or two consisting of at least 400 to 500 words. The average C.T.T for each applicant is then calculated by dividing the no. of words, the applicant has typed by the total allocated time. This gives a good indication of the applicant's average ability to type.

In this case a single paragraph consisting of 35 words was presented to the applicants to be completed in 1 minute. The test, as devised, cannot be used to judge the typing capabilities of applicants. Whenever a criterion of typing speed, mostly 35 words per minute, is mentioned in advertisements, it normally refers to the average typing speed. Typing only 35 words in a single minute does not serve the purpose.

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Another anomaly of the conducted typing test lies in the fact that not even a single applicant completed the given 35 words paragraph in the allotted 1 minute of test time. Even based on the selection criteria, which did not follow the normal government practices, no applicant was qualified enough to be selected as a Junior clerk.

Still further, only two of the many answer sheets are marked. There seems to be no reason for that. The marked answer sheets are similar to the many other answer sheets submitted. Yet while two of the answer sheets were marked, the remaining answer sheets were left unmarked.

Finally the Ex-AEO signed the answer sheets mostly at the top right most corner of the paper. Again there is no apparent reason for doing that. It seems that such was done to allow alterations or fill up of the answer sheets later on, by others. It is quite evident that the entire process of selection of Junior Clerks was unfair and devoid of merit & transparency.

6.4) As per the standard operating procedure, appointment orders are issued at the same date for each category of vacancies. In this case however, in spite of completing the interview process, the Ex-AEO issued random appointment orders which do not match the number of sanctioned posts against which the appointment orders were issued. A break up of sanctioned posts and appointment orders issued against each category of sanctioned posts is as under.

Sanctioned Posts	No of appointment orders issues
1. 41 posts of CT	03
2. 33 posts of DM	04
3. 25 posts of PET	06
4. 12 posts of Lab In charge.	02
5. 10 posts of LA	01
6. 10 posts of Qari	03
7. 02 posts of paish imam	01

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Total 133 — 20

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As can be seen from the table above, in no category did the sanctioned posts match the no of appointment orders issued. For example out of the 41 sanctioned posts of CT, only 03 appointment orders were issued even though a number of candidates, enough to fill all the 41 sanctioned posts, were interviewed (bullet 1 of the table above). There is apparently no reason or logic for issuing of appointment orders in such manner.

Considering that the incumbent is a government officer in BPS-18, he can be assumed to be well versed in basic standard operating procedures of issuance of appointment orders. This only gives one logical explanation for the blunder committed by the Ex-AEO. The incumbent obviously issued appointment orders of favorites or those with whom he may have developed an understanding of a covert deal, leaving the rest of the appointment orders open to be manipulated as per his requirements.

This fact is also evident from the narration of the six complainants (applicants) before the inquiry committee. Most of them were on the top of merit lists in their respective categories but these appointment orders were not issued. They revealed before the inquiry committee that they were pressurized/approached to pay up to PKR 500,000 (0.5 Million) as sohbat (bribe). They also alleged that no merit list was displayed at all.

6.5) There were other anomalies associated with the process too. For instance in the list of selected candidates Mr. Bakhtawar Jan of Tehsil Dosalai was at S.No 04 but he was not recommended for selection. When the AEO was inquired, he informed in person as well as in writing that the documents submitted by Mr. Bakhtawar Jan for the post of CT were fake. However it is evident that in this case the candidate was dropped from selection without proper procedure i.e. without verification of the documents from his respective board.

6.6) Similarly Mr. Abdurehman was at S.No 01 for the position of TT Tehsil Dattakhel, however he was not selected for the post of TT but was adjusted instead as Qari in BPS-7 which does not make sense as the candidate was qualified enough to be posted as TT which is a BPS-14/15 post.

6.7) Mr. Asimullah s/o Ghazi Muhammad applied for the post of C.T. He has a valid M-Phil degree which he produced before the inquiry committee. Despite that he was denied 05 (Five) marks of M-Phil.

6.8) Directorate of Education, FATA completely failed to discharge its supervisory role effectively. There appears to be complete disconnect between the Directorate

Agency Education Officer
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and its field formations. In this instant inquiry, following lapses were noted on the part of Directorate of FATA.

Dispatch of letter regarding ban on recruitments was unnecessarily delayed for more than two months; fully aware of the law & order situation and occasional road closure, no information was forwarded through email or telephone, which amounts to negligence bordering on connivance & collusion. Ban was imposed by federal government on recruitment on 20th June 2013. Directions of the federal government regarding ban were conveyed to the Directorate of Education, FATA on 15-07-2013 (Annex-XIV). However, the same was endorsed to the field formations on 17-09-2013 (Annex-XV). Such unusual delay is beyond comprehension and requires further probe by the relevant authorities. The Directorate is totally unaware of the indulgence of its field Officers in malpractices and there is no mechanism of checks & balances or taking immediate corrective measures.

It is evident that all recruitments were made during the ban imposed by federal government and cannot be justified, declared legal due to delayed communication of directions to field formation as information to that effect was widely advertised in print and electronic media.

7. Conclusions:

It is quite evident from the findings that due procedure, merit and transparency have been compromised by the Ex-AEO while recruiting for the 200 advertised posts. Although the accused claims that he did follow rules and merit, while undertaking the recruitment process, facts instead, point to a completely different version of what the Ex-AEO stated. Part of the blame also lies with the directorate of education which seems to be completely out of sync with its field formations both in terms of monitoring the formations' activities as well as communicating pertinent information to the same in a timely manner.

8. Recommendations:

- 8.1) The recruitments were made during the ban imposed by the Government and in violation of the laid down policy, hence the committee endorsed the decision of Political Agent declaring the appointments null and void.
- 8.2) Proper disciplinary proceedings be initiated against the Ex-Agency Education Officer under the E&D Rules, on the following grounds:-

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11/11/13

Agency Education Officer
North Waziristan Agency

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- Violating policy of recruitment by not displaying merit list for ten days, which was mandatory.
- Issuance of random appointment orders to 27 candidates instead of 200.
- Issuance of recruitment orders during the ban period.
- Improper conduct of typing test for the post of junior clerks.

- 8.3) In future, Political Administration should supervise the recruitments by deputing Additional Political Agent or an officer not below the rank of BPS-17.
- 8.4) All Important notifications /instructions received for the Government should conveyed immediately through email, fax etc.
- 8.5) Directorate of Education should play a proactive role and discharge its supervisory role.
- 8.6) Documents of all the selected candidates, in possession of Political Administration North Waziristan Agency, should be forwarded to relevant Boards for verification and criminal proceedings be initiated against those whose degrees found bogus after verification.
- 8.7) Should initiate an exercise in all the departments where the status of relevant recruitments during the period when the ban remained imposed, should be ascertained. All Administrative Departments of FATA Secretariat with specific reference to Education and Health so as to ascertain status of recruitment during the ban period.
- 8.9) Directorate of Education and Health should conduct an Inquiry of recruitment since 01.07.2012 till December, 2013.

MUHAMMAD

MR. ARSHAD WAHEED MOHMAND,
SECRETARY, FATA INVESTMENT FACILITATION AUTHORITY,
FATA SECRETARIAT.

MR. MUHAMMAD FAYYAZ,
PRINCIPAL GOVT DEGREE COLLEGE,
GHILGO, ORAKZAI.

MR. MUHAMMAD SOLEMAN, 17/12/13
DEPUTY SECRETARY FINANCE,
FINANCE DEPARTMENT FATA SECRETARIAT.

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12 June

Agency Education Officer
North Waziristan Agency

No. 3991-

From:

The Political Agent,
North Waziristan Agency,
Miranshah.

Dated 21/10/2013.

The Agency Accounts Officer,
North Waziristan Agency.

Subject:

RECRUITMENT IN EDUCATION DEPARTMENT
NWA.

Memo:

As per complaint registered in the cell as well as serious grievances were also registered before the Political Agent in various jirgas, the same complaint were also published in prominent news papers that male-practices are involved in all the recruitments made by the then Agency Education Officer NWA.

It was also alleged that most of the Degrees/Certificates were fake on the basis of which recruitment was prepared. So as taking action on such complaints, the Political Agent ordered inquiry as well as declared all the recruitment orders in respect of the Agency Education Officer NWA null & void.

Therefore, you are requested not to honor such appointment orders and not to release their salaries as the same can create Law & order situation in the Agency which is already complicated and sensitive.

*Attended
Colonel
Associate*

Political Agent,
North Waziristan Agency
Miranshah.

*Attended
Colonel
Associate*

- Even No & Date:
Copy forwarded to:
1. Chief Secretary, Khyber Pakhtunkhwa Peshawar.
 2. Additional Chief Secretary, FATA Secretariat Peshawar.
 3. Secretary to Governor, Khyber-Pakhtunkhwa, Peshawar.
 4. Secretary (Law & Order) FATA Secretariat, Peshawar.
 5. Commissioner, Bannu Division Bannu.
 6. M.S. to Governor, Khyber-Pakhtunkhwa, Peshawar.
 7. Headquarter IX Corps Peshawar.

Information and necessary action
to be taken for information and

Political Agent,
North Waziristan Agency

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OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY MIRANSHAH
 REVISED FINAL MERIT LIST BEFORE VERIFICATION OF MALE "PET" TEHSIL MIRANSHAH 10/8/2016

Sl. No.	Name	Name	DOB	SSC		FA/Sc		B.A/B.Sc		MA/MS		IDE (PET)		Service Mark	Science Marks	Total Score	Remarks						
				OS	OS	OS	OS	OS	OS	OS	OS												
1	Abid ur Rehman	Sher Gul	25.4.1985	850	✓ 512	12.05	1100	✓ 615	11.18	2300	1313	11.42	2000	1382	10.37	1050	689	13.12	0	5	63.14	PETITIONER ✓	
2	Kausar Iqbal	Gul Kem Khan	1.9.1988	850	✓ 445	10.47	1100	✓ 751	13.65	550	✓ 323	11.75	2200	1336	9.11	1050	631	12.02	0	0	0	57.00	✓
3	Anwarullah	Noor Anwar	10.3.1984	850	✓ 494	11.62	1100	✓ 572	10.4	550	✓ 322	11.71	700	401	8.59	750	465	12.4	0	0	0	54.72	✓
4	Aleemullah	Ghazi Muhammad	20.4.1982	1050	✓ 663	12.63	1100	✓ 521	9.47	550	✓ 321	11.67	750	366	7.32	1050	677	12.9	0	5	52.60	PETITIONER ✓	
5	Zahidullah	Khalilullah	2.2.1978	850	✓ 406	9.55	1400	✓ 755	10.79	550	✓ 253	9.2	1100	✓ 586	7.99	1050	774	14.74	0	0	0	52.51	All Documents Re ✓
6	Zer Alam Khan	Sher Alam Khan	15.1.1988																			52.27	

Chairman
 1- MUHAMMAD NABI AEO NWA
 AEO N.W.Agency

Member
 5- Mst. Samiullah
 V/Principal GHSS Eidak NWA

Member
 2- Muhammad Saleem Wazir
 HM Hasham Abad Khyber Agency

Member
 6- Mr. Noorallah Jan
 AEO NWA

Assistant Agency Education Officer
 Agency

Member
 3- Abdul Manan
 SO (Education) FATA

Member
 7- Mst. Taj Meena
 AEO (F) NWA

Member
 4- Mr. Fazal Wadood
 Political Tehsildar-MRN

IN THE PESHAWAR HIGH COURT,
BANNU BENCH

(Judicial Department)

W.P No.286-B of 2018.

Rafiq Ullah etc

Vs

Govt of KPK etc.

JUDGEMENT/ORDER.

Date of hearing 11.12.2018

Petitioner by: Mr. Masood Iqbal Khattak,
Advocate.

Respondents by Mr. Shahid Hameed Qureshi,
Addl: AG for official respondents

MUHAMMAD NASIR MAHFOOZ, J. - Petitioners have
prayed for the following relief in the instant writ petition...

*"On acceptance of instant petition,
appropriate writ may very kindly be
issued to respondents to the effect
that back benefits may kindly be
given to the petitioners from the
date of first appointment i.e.
21.9.2013 - till the date of
appointment of the petitioners i.e.
30.11.2016 and 14.4.2017
respectively, on the worthy order of*

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Hon'ble High Court and the respondents also should be restrained not make interference in the service of petitioner or conduct any inquiry against him. This Hon'ble Court may further be pleased."

2. It is alleged that petitioners were appointed to their respective posts by the Departmental Selection Committee, but on 21.9.2013 the appointment orders were cancelled. They filed writ petition No.408-B/2013, which was disposed off on 10.12.2015 with the direction that the petitioners would be considered if they were found to be qualified and eligible on merits. Thus they were appointed on 30.11.2016 and 14.4.2017, but not from 21.9.2013. Hence, the instant writ petition.

3. I have heard arguments of learned counsel for the petitioners and learned AAG for the respondents and perused the record.

P. J. Singh

ATTESTED
[Signature]
[Faint text]

4. The order passed in earlier writ petition No.408-B/2013 decided on 10.12.2015 does not reveal any direction for the appointment of petitioners from back dates or entitlement to back benefits. Orders of Courts are always prospective in nature and not retrospective unless the Court gives clear cut direction in this regard keeping in view the facts and circumstances of the case. Petitioners have failed to make out any case for entitlement to back benefits strictly observing the relevant rules and regulations. Mere verbal assertions of the petitioners could not be considered as a good ground for grant of back benefits.

4. In view of the above, the instant writ petition failed, hence dismissed with no order as to costs.

Announced.
11.12.2018
Ihsan.*/-

Sd/ Mr Justice Muhammad Nasir
Sd/ Mr. Justice Shakeel Ahmad

11/12/18

