

1103/2014


27.10.2017

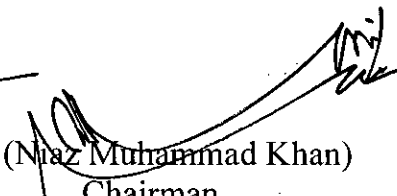
Counsel for the appellant and Mr. Kabeerullah Khattak, Addl. Advocate General alongwith Hameedullah, Assistant Director of the respondents present.

2. Both the learned counsel for the parties agreed on the point that if this appeal is disposed of in the terms that the department shall calculate the quota of promotees in accordance with the prevalent rules at different stages and then the department shall consider only those appellants and others who are eligible and fit in accordance with the calculation of the department.

3. In view of the above, the respondents are directed that they should calculate the quota of promotees in accordance with the prevalent rules at different stages and then they should consider all those who are eligible and fit for promotion at different stages.

4. The appeal is disposed of in the above terms. Parties are left to bear their own costs. File be consigned to the record room.


(Ahmad Hassan)
Member

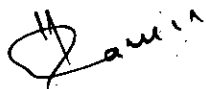

(Niaz Muhammad Khan)
Chairman

ANNOUNCED
27.10.2017

14. 07.07.2017


Learned counsel for the appellant and Mr. Kabir Ullah Khattak, Assistant AG for the respondents present. The respondent department is directed to produce complete all relevant record before the next date of hearing. To come up for such record and arguments on 27.10.2017 before D.B.

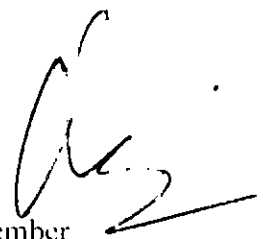

(Gul Zeb Khan)
Member


(Muhammad Hamid Mughal)
Member

28.6.2016

Counsel for the appellant and Mr. Ziaullah, GP for respondents present. Counsel for the appellant requested for adjournment. Adjournment accepted. To come up for arguments on 9.11.2016.


Member


Member

09.11.2016

Counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Counsel for the appellant requested for adjournment. To come up for arguments on 16-3-17.


(Muhammad Amir Nazir)
Member


(Pir Bakhsch Shah)
Member

16.03.2017

Mr. Taimur Khan, junior counsel for appellant and Mr. Muhammad Adeel Butt, Additional AG for respondents present. Junior counsel for appellant requested for adjournment as senior counsel for appellant is stated busy in the Hon'ble Peshawar High Court. Adjournment granted. To come up for arguments on 07.07.2017 before D.B.


(ASHFAQUE TAJ)
MEMBER


(MUHAMMAD AMIR NAZIR)
MEMBER

30.11.2015

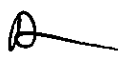
Counsel for the appellant and Mr. Muhammad Jan, GP for respondent present. Rejoinder on behalf of the appellant submitted copy of which is placed on file. To come up for arguments on 3-3-16

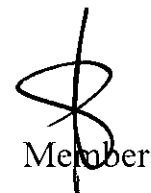

Member


Member

03.03.2016

Counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Since the court time is over, therefore, the case is adjourned to 08.06.2016 for arguments.


Member


Member

08.06.2016

Counsel for the appellant and Mr. Ziaullah, GP for respondents present. Learned counsel for the appellant stated that identical cases are fixed on 28.06.2016 and this appeal may also be fixed alongwith those identical appeals. To come up for arguments on 28-6-16 before D.B alongwith connected appeals.

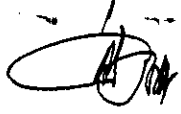

MEMBER


MEMBER

6.

25.03.2015

Appellant Deposited
Security & Process Fee ▶



Counsel for the appellant present. Learned counsel for the appellant argued that similar service appeals No. 1218/14, 1159/14 and 1036/14 are already admitted to regular hearing and fixed for 14.05.2015.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 14.05.2015 before S.B to heard alongwith the afore-stated appeals.


Chairman

7

14.05.2015

Appellant in person and Mr. Muhammad Irfan, ADO alongwith Addl: A.G for respondents present. Written reply not submitted. Requested for adjournment. To come up for written reply on 11.8.2015 before S.B.


Chairman

8

11.08.2015

Counsel for the appellant and Mr. Muhammad Irfan, ADO alongwith Assistant A.G for respondents present. Written statement submitted. The appeal is assigned to D.B for rejoinder and final hearing for 30.11.2015.


Chairman

3.

Reader Note:

25.11.2014

Clerk of counsel for the appellant present. Since the Tribunal is incomplete, therefore, case is adjourned to 04.12.2014 for the same.


Reader

4.

Reader Note:

04.12.2014

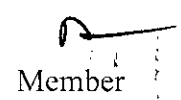
Counsel for the appellant present. Since the Tribunal is incomplete, therefore, case is adjourned to 17.02.2015 for the same.


Reader

5.

17.02.2015



Clerk of counsel for the appellant present, and requested for adjournment. Request accepted. To come up for preliminary hearing on 25.03.2015


Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1103/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	03/09/2014	<p>The appeal of Mr. Muhammad Ibrahim Jan presented today by Mr. Muhammad Asif Yousafzai Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	4-9-2011	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>25-11-2014</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

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

Appeal No. 1103 /2014


Mr. Muhammad Ibrahim Jan V/S Education Department.

INDEX

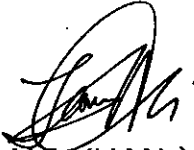
S.No.	Documents	Annexure	Page No.
1.	Memo of Appeal	-----	01-03
2.	Copy of Service Book	- A -	04-13
3.	Copy of SSC	- B -	14
4.	Copy of Service Certificate	-C-	15
4.	Copy of Notification	- D -	16-17
5.	Copy of Departmental Appeal	- E -	18
6.	Copy of Judgment dt.30.01.2009	- F -	19-22
7.	Copy of Judgment dt.21.10.2011	- G -	23-25
8.	Copy of Judgment dt.11.01.2012	- H -	26-28
9.	Vakalat Nama	-----	29

Appellant

Through:


(M. ASIF YOUSAFZAI)
ADVOCATE, PESHAWAR.

And


(TAIMUR ALI KHAN)
Advocate, Peshawar.

①

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

Appeal No. 1103 /2014

1134
03/9/2014

Mr. Muhammad Ibrahim Jan, Class-IV,
Government Primary School, Kandari,
Nowshera.

APPELLANT

VERSUS

1. The Secretary Education (E&SE), Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. The Director, Education (E&SE) Department, Peshawar.
3. The DEO (E&SE), (Male), Nowshera.
4. The Secretary, Finance Department, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.

RESPONDENTS

.....

APPEAL UNDER SECTION-4 OF THE KPK SERVICE TRIBUNAL ACT 1974 FOR DIRECTING THE RESPONDENTS TO CONSIDER THE APPELLANT FOR PROMOTION TO THE POST OF JUNIOR CLERK UNDER 33% QUOTA FIXED BY THE GOVERNMENT AND AGAINST NOT TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT.

[Signature]
3/9/14

.....

PRAYER:

THAT ON ACCEPTANCE OF THIS APPEAL, THE RESPONDENTS MAY BE DIRECTED TO CONSIDER THE APPELLANT FOR PROMOTION TO THE POST OF JUNIOR CLERK UNDER 33% QUOTA FIXED BY THE GOVERNMENT FROM HIS DUE DATE/AVAILABILITY OF POST WITH ALL BACK CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTFULLY SHEWETH:

1. That the appellant joined the respondent department on 15.05.1991. The appellant more than 23 years service with good record through out at his credit. All entries have been recoded in the Service Book which is attached as Annexure-A.
2. That the appellant is highly qualified and has passed SSC with 23 years experience. Copy of SSC Certificate, Service Certificate are attached as Annexure-B and C.
3. That the Government of KPK has fixed 33% quota for Class-IV with SSC qualification for the promotion to the Junior Clerk post. But despite of that fixed quota and having eligibility, the appellant was never consider for promotion to the post of Junior Clerk. Copy of Notification is attached as Annexure-D.
4. That the appellant filed Departmental Appeal for his claim on 01.04.2014 and waited for 90 days, but no reply has been received by the respondent to the appellant so far, hence the present appeal following grounds amongst the others: Copy of Departmental Appeal is attached as Annexure-E.

GROUND:

- A) That not granting pay benefits of higher post of Junior Clerk and not considering the appellant for regular promotion under 33% quota is against the norms of justice and material on record.
- B) That the appellant is senior most eligible and qualified Class-IV employee and he is entitled to be promoted as Junior Clerk under 33% reserved quota.
- C) That the appellant has been kept deprived from his legal right of promotion which is not tenable under the norms of justice and fair play.
- D) That the respondent department has never observed 33% quota, rather the department promoted the most junior person under 33% quota who were junior to appellant. Thus, the promotion order issued by the

respondent department of the most junior person is highly discriminatory and based on nepotism.

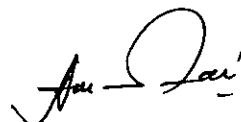
- E) That similar appeal have already been decided by this august Tribunal Appeal No.769/2008 decided on 30.1.2009, Appeal No.1604/2010 decided on 21.1.2011 and appeal No.104/2011, and No.323/2011 decided on 11.1.2012. Thus, the appellant also deserves the same treatment under the principle of consistency being similarly placed person. Copies of the Judgments are attached as Annexure- F, G & H.
- F) That the appellant has not been treated according to law, rules.
- G) That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

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



Appellant
Muhammad Ibrahim Jan

Through:



(M. ASIF YOUSAFZAI)
ADVOCATE, PESHAWAR.

And



(TAIMUR ALI KHAN)
Advocate, Peshawar.



A

4

(For use in Police Department only).

Date of Birth verified from SSC
passed SSC examination from the BISE
Peshawar under Roll 17190 in 1993 marks
obtained 370/850 and placed grade "D"

- 1.
- 2.
- 3.

[Signature]
 Education Officer
 (Male) Nurshera

Verification Roll No. _____ dated _____ received back _____

Left thumb-impression.

Qualification	Date	Qualifications	Date
Examined from BISE			
English	Examined under Roll No.	First Arts	
Pashtu	17190 in session 1993	B. L. or B. A.	
Urdu	Marks 370 marks	Pleaderships examination	
Plain-drawing		Training School Final examination	
Finger print	<i>[Signature]</i>	Other Qualifications	
Drill instructing	Nurshera		
Court duties			
Reserve duties			

NAC 137-92-612444

[Signature]
 Razwali Khan SET. B
 Head Master
 GMS Kander (NSD)

[Signature]
 Head Master,
 Govt. High School,
 Nurshera

ATTESTED

Note:—The entries in this page should be checked or re-attested at least every five years and the signature to items 9 and 10 should be dated.

1. Name MR. MOHAMMAD IBRAHIM JAN.

2. Race .. Islem

3. Residence village Gul Banda, Dist. Charsadda.

4. Father's name and residence .. Rahaman Gul.

5. Date of birth by Christian era as nearly as can be ascertained (4-4-1976) fourth April N 11. Seventy six.

6. Exact height by measurement .. 5-6

7. Personal marks for identification .. A mole on forehead.

8. Left hand thumb and finger impression of (non-gazetted) officer

Little Finger. [Impression] Ring Finger. [Impression]

Middle Finger. [Impression] Fore Finger. [Impression]

Thumb. [Impression]

Head Master
G. M. S.
Newa Killi
Nowhera Kajar

Signature of Government servant. [Signature]

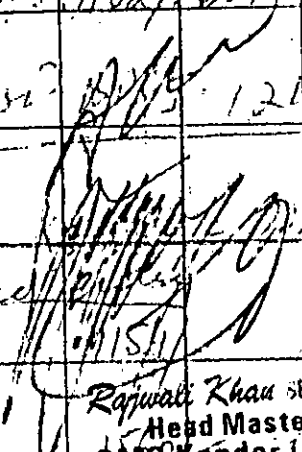
10. Signature and designation of the Head of the Office or other Attesting Officer.

[Signature] Head Master
GMS Kander (NS?)

6

4

1	2	3	4	5	6	7	8	
Name of post	Whether substan- tive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant	Signa- designa- head of other officer i of col.
N/A - Post		G.P.S. No. (1100-13-260)				✓		
GMS. Misra Kipli		Temp	600/- pm			16 $\frac{5}{91}$	[Signature]	B.P.E
		G.P.S. No. (930-26-1310)					[Signature]	
do		Temp	1024/- pm			1 $\frac{6}{91}$	[Signature]	
do		Temp	1050/- pm			1 $\frac{12}{91}$	[Signature]	
do		Temp	1076/- pm			1 $\frac{14}{92}$	[Signature]	
DEO (M) Sd/- N.S.R.		Temp	1076/- pm			1 $\frac{7}{93}$	[Signature]	
GMS. Bahadur Kipli		Temp	1076/- pm			10 $\frac{8}{93}$	[Signature]	
GMS. Bahadur Kipli		Temp	1102/- pm			1 $\frac{12}{93}$	[Signature]	
		Revised No. (1215-35-1770)						
						1 $\frac{6}{94}$	[Signature]	
						1 $\frac{1}{94}$		
						1 $\frac{6}{94}$		
						1 $\frac{10}{94}$		
						1 $\frac{12}{94}$		


 Rajwari Khan Sd/-
 Head Master
 GMS Kander (NS)

Head Master
 (C.M.S.)
 Mewa Killi
 Dowlatabad

Rajwari Khan Sd/-
 Head Master
 GMS Kander (NS)

1595/-

9	10	11	12	13		14	15
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
				Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	Period Government to which debitable		
S.I.F.O. (NSR)				Appointed against N/ansid			
				Post vide SDEO (M) Nowshera			
				Order No: 4287-90			
				dated 15-5-1991			
	11/91	incl					
	11/92	incl					
	6/93	transfer to SDEO (M) Nowshera		SERVICE VERIFIED			
	8/93			from 1-1-93 to 31-12-93 from the Acq. Roll and other record of this office.			
	11/92			SERVICE VERIFIED			
	31/93			from 1-1-92 to 31-12-92 from the Acq. Roll and other record of this office.			
Head Master G. H. S. Behram Kalan	30/11/94	Annual increment	Head Master G. H. S. Behram Kalan NSR	SERVICE VERIFIED			
				from 1-7-93 to 30-6-93 from the Acq. Roll and other record of this office.			
				Service verified w.e.f 1-7-93 to 10-8-93 from the Acq. Roll and other record of this office.			
Head Master G. M. S. Nowshera Kalan				Record of this office.			
				Education Officer Nowshera			
				Head Master GMSKander (NSR)			

③
⑧

1	2	3	4	5	6	7	8	9
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C S R	Pay in substantive post	Additional pay for officiating	Other emolument falling under the term 'Pay'	Date of appointment	Signature of Government servant	Signature designated head of the office or other officer in-charge of column
N/Class of GITS Bahram - Temp Kalle (NRE)	Temp Officiating	BPS NRI (1245-35-1770)	Rs 1535/-			12/1/1995	[Signature]	Head of Office
do	do	Rs 1560/-				12/95	[Signature]	Head of Office
do	do	Rs 1630/-				1/96	[Signature]	Head of Office
do	do	Rs 1665/-				12/96	[Signature]	Head of Office
do	do	Rs 1700/-				12/97	[Signature]	Head of Office
<p><i>[Large handwritten scribbles and signatures]</i></p>								
<p>Office of the Distt. Accounts Officer, Narsara.</p> <p style="text-align: right;">Rajwali Khan SET. 3. Head Master GMS Kander (NSR)</p>								
<p>Pay fixed to the retired pay scales 1994 of Rs. 920-26-1310 (CB-1) with next increment on 1-6-1994 @ Rs. 1024/- E.F. 1-6-1994</p> <p style="text-align: center;">District Accounts Officer, Narsara</p>								
<p>Office of the Distt. Accounts Officer, Narsara.</p> <p>Pay fixed to the retired pay scales 1994 of Rs. 1245-35-1770 (CB-1) with next increment on 1-6-1994 @ Rs. 1490/- E.F. 1-6-1994</p> <p style="text-align: center;">District Accounts Officer, Narsara</p> <p style="text-align: left;">ATTESTED</p>								

9	10	11	12	13		14	15	
				Leave				
Signature and designation of the head of the office or other attesting official in attestation of columns 1 to 4	Date of termination of appointment	Reason of termination (such as, promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting official	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
					Period	Government to which debitable		
Head Master G. H. S. Kalli MSR	30/11/95	11/11/95	Head Master Govt High School Kalli MSR	Sanctioned	10/31/95	10/31/95		
Head Master Govt High School Kalli MSR	30/11/96	11/11/96	Head Master Govt High School Kalli MSR	Sanctioned	10/31/96	10/31/96		
Head Master Govt High School Kalli MSR	30/11/97	11/11/97	Head Master Govt High School Kalli MSR	Sanctioned	10/31/97	10/31/97		
Head Master Govt High School Kalli MSR	30/11/98	11/11/98	Head Master Govt High School Kalli MSR	Sanctioned	10/31/98	10/31/98		
Head Master Govt High School Kalli MSR	30/11/99	11/11/99	Head Master Govt High School Kalli MSR	Sanctioned	10/31/99	10/31/99		
Head Master Govt High School Kalli MSR	30/11/00	11/11/00	Head Master Govt High School Kalli MSR	Sanctioned	10/31/00	10/31/00		
Head Master Govt High School Kalli MSR	30/11/01	11/11/01	Head Master Govt High School Kalli MSR	Sanctioned	10/31/01	10/31/01		
Head Master Govt High School Kalli MSR	30/11/02	11/11/02	Head Master Govt High School Kalli MSR	Sanctioned	10/31/02	10/31/02		
Head Master Govt High School Kalli MSR	30/11/03	11/11/03	Head Master Govt High School Kalli MSR	Sanctioned	10/31/03	10/31/03		
Head Master Govt High School Kalli MSR	30/11/04	11/11/04	Head Master Govt High School Kalli MSR	Sanctioned	10/31/04	10/31/04		
Head Master Govt High School Kalli MSR	30/11/05	11/11/05	Head Master Govt High School Kalli MSR	Sanctioned	10/31/05	10/31/05		
Head Master Govt High School Kalli MSR	30/11/06	11/11/06	Head Master Govt High School Kalli MSR	Sanctioned	10/31/06	10/31/06		
Head Master Govt High School Kalli MSR	30/11/07	11/11/07	Head Master Govt High School Kalli MSR	Sanctioned	10/31/07	10/31/07		
Head Master Govt High School Kalli MSR	30/11/08	11/11/08	Head Master Govt High School Kalli MSR	Sanctioned	10/31/08	10/31/08		
Head Master Govt High School Kalli MSR	30/11/09	11/11/09	Head Master Govt High School Kalli MSR	Sanctioned	10/31/09	10/31/09		
Head Master Govt High School Kalli MSR	30/11/10	11/11/10	Head Master Govt High School Kalli MSR	Sanctioned	10/31/10	10/31/10		
Head Master Govt High School Kalli MSR	30/11/11	11/11/11	Head Master Govt High School Kalli MSR	Sanctioned	10/31/11	10/31/11		
Head Master Govt High School Kalli MSR	30/11/12	11/11/12	Head Master Govt High School Kalli MSR	Sanctioned	10/31/12	10/31/12		
Head Master Govt High School Kalli MSR	30/11/13	11/11/13	Head Master Govt High School Kalli MSR	Sanctioned	10/31/13	10/31/13		
Head Master Govt High School Kalli MSR	30/11/14	11/11/14	Head Master Govt High School Kalli MSR	Sanctioned	10/31/14	10/31/14		
Head Master Govt High School Kalli MSR	30/11/15	11/11/15	Head Master Govt High School Kalli MSR	Sanctioned	10/31/15	10/31/15		
Head Master Govt High School Kalli MSR	30/11/16	11/11/16	Head Master Govt High School Kalli MSR	Sanctioned	10/31/16	10/31/16		
Head Master Govt High School Kalli MSR	30/11/17	11/11/17	Head Master Govt High School Kalli MSR	Sanctioned	10/31/17	10/31/17		
Head Master Govt High School Kalli MSR	30/11/18	11/11/18	Head Master Govt High School Kalli MSR	Sanctioned	10/31/18	10/31/18		
Head Master Govt High School Kalli MSR	30/11/19	11/11/19	Head Master Govt High School Kalli MSR	Sanctioned	10/31/19	10/31/19		
Head Master Govt High School Kalli MSR	30/11/20	11/11/20	Head Master Govt High School Kalli MSR	Sanctioned	10/31/20	10/31/20		
Head Master Govt High School Kalli MSR	30/11/21	11/11/21	Head Master Govt High School Kalli MSR	Sanctioned	10/31/21	10/31/21		
Head Master Govt High School Kalli MSR	30/11/22	11/11/22	Head Master Govt High School Kalli MSR	Sanctioned	10/31/22	10/31/22		
Head Master Govt High School Kalli MSR	30/11/23	11/11/23	Head Master Govt High School Kalli MSR	Sanctioned	10/31/23	10/31/23		
Head Master Govt High School Kalli MSR	30/11/24	11/11/24	Head Master Govt High School Kalli MSR	Sanctioned	10/31/24	10/31/24		
Head Master Govt High School Kalli MSR	30/11/25	11/11/25	Head Master Govt High School Kalli MSR	Sanctioned	10/31/25	10/31/25		
Head Master Govt High School Kalli MSR	30/11/26	11/11/26	Head Master Govt High School Kalli MSR	Sanctioned	10/31/26	10/31/26		
Head Master Govt High School Kalli MSR	30/11/27	11/11/27	Head Master Govt High School Kalli MSR	Sanctioned	10/31/27	10/31/27		
Head Master Govt High School Kalli MSR	30/11/28	11/11/28	Head Master Govt High School Kalli MSR	Sanctioned	10/31/28	10/31/28		
Head Master Govt High School Kalli MSR	30/11/29	11/11/29	Head Master Govt High School Kalli MSR	Sanctioned	10/31/29	10/31/29		
Head Master Govt High School Kalli MSR	30/11/30	11/11/30	Head Master Govt High School Kalli MSR	Sanctioned	10/31/30	10/31/30		

T. 14/12/95

Advance of two months salary of BSC exam. passed in July 1994 to July 1995.

Services verified from the dept roll book of the records of this school from 10.8.1993 to 30.11.1994.

Head Master G. M. S. Kalli MSR District Accountant of Mysore

NO. 109 dt 12/2/98
copy of annual increment for 12/32 & 1/98 @ 170%

Service verified with 12-1994 to 31-12-1995 from the official record of this school.

Head Master G. H. S. Kalli MSR

Sajwali Khan SET: B Head Master GMS Kaller (NSR)

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term 'Pay'	Date of appointment	Signature of Government servant
N.O GMS Kander Killa (NSR)	Temp.		Rs 1700/-			12/1997	<i>[Signature]</i>
-do-	-do-		Rs 1735/-			12/1998	<i>[Signature]</i>
-do-	-do-		Rs 1770/-			12/1999	<i>[Signature]</i>
-do-	-do-	BPS 2 (1275-44-1935) Rs 1800/-				12/2000	<i>[Signature]</i>

option

I have by opt. for my pay on

2/12/98 on eve of my selection grade

BPS 2 & after annual increment as

1/12/98 in BPS 1 S

[Large handwritten signature]

Rajwali Khan
Head Master
GMS Kander (NSR)

ATTESTED

Head Master
G. M. N.
Newan Killa
Nowhera Killa

[Signature]
SRE

SET. 8/17

(11)

9	10	11	12	13		14	15
Signature and designation of the head of the office or other attesting officer in attestation of column 1 to 8				Leave		Signature of the head of the office or other attesting officer	
Date of termination of appointment				Allocation of period of leave on average pay upto four months for which leave salary is payable to another Government		Reference to any recorded punishment or censure, or reward or praise of the Government Servant.	
Reason of termination (such as promotion, transfer, dismissal, etc).				Nature and duration of leave taken		Signature of the head of the office or other attesting officer	
[Signature]	30/11/97	A/S	[Signature]	S. Period	Government to which debitabe	[Signature]	
[Signature]	30/11/97	A/S	[Signature]	S. Period	Government to which debitabe	[Signature]	
[Signature]	30/11/97	A/S	[Signature]	S. Period	Government to which debitabe	[Signature]	
[Signature]	30/11/97	A/S	[Signature]	S. Period	Government to which debitabe	[Signature]	
[Signature]	30/11/97	A/S	[Signature]	S. Period	Government to which debitabe	[Signature]	
[Signature]	30/11/97	A/S	[Signature]	S. Period	Government to which debitabe	[Signature]	
[Signature]	30/11/97	A/S	[Signature]	S. Period	Government to which debitabe	[Signature]	
[Signature]	30/11/97	A/S	[Signature]	S. Period	Government to which debitabe	[Signature]	
[Signature]	30/11/97	A/S	[Signature]	S. Period	Government to which debitabe	[Signature]	
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[Signature]	30/11/97	A/S	[Signature]	S. Period	Government to which debitabe	[Signature]	
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[Signature]	30/11/97	A/S	[Signature]	S. Period	Government to which debitabe	[Signature]	
[Signature]	30/11/97	A/S	[Signature]	S. Period	Government to which debitabe	[Signature]	
[Signature]	30/11/97	A/S	[Signature]	S. Period	Government to which debitabe	[Signature]	

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Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government (author)	Signature of the Officer of col
		BPS	2 RS			1275-44-1935		
COAS			Applied by BPS 2 including					
Bahawalpur			Increase					
NSA								
do			RS 1893/-*			12/2/98	<i>[Signature]</i>	
			RS 1847/-			12/1/99	<i>[Signature]</i>	
			RS 1891/-*			12/2/00	<i>[Signature]</i>	
			RS 1935/-			12/2001	<i>[Signature]</i>	
		Pay revised on 1-12-2001						
		BPS=02 (1915-65-3865)						
			RS= 2890/-			12/2001	<i>[Signature]</i>	
			RS= 2955/-			12/2002	<i>[Signature]</i>	

Head Master
G. M. S.
Nowshera
Khyber Pakhtunkhwa

Office of the
NWFP Peshawar
Pay Fixation Party
1-12-2001
1-12-2002
Pay Fixation Party NWFP, Peshawar

[Signature]
Rashidi Khan SET, B-1
Head Master
GMS Kander (NSP)

ATTESTED

2955/- PM

12/2002
[Signature]

(B)

9	10	11	12	13		14	15
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8				Leave		Signature of the head of the office or other attesting officer	
				Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)		
to C.P. Found. Ahmedn.							
District Accounts Officer M. N. Shere				9/17/1977		Awarded selection grade BPS 27/98 vide DE.O. (NSR) Secy (NSR) Extra No 1742-1801 Syed A. D. A. 23.6.2001	
Govt. High School Behram Kull (NSR)	30/11/98	Pay fix in BPS 27	Behram Kull (NSR)	Head Master		Behram Kull (NSR)	Head Master
Govt. High School Behram Kull (NSR)	30/11/99	A/Duc	Behram Kull (NSR)	Head Master		Behram Kull (NSR)	Head Master
Govt. High School Behram Kull (NSR)	30/11/2000	A/Duc	Behram Kull (NSR)	Head Master		Behram Kull (NSR)	Head Master
Govt. High School Behram Kull (NSR)	30/11/2001	A/Duc	Behram Kull (NSR)	Head Master		Behram Kull (NSR)	Head Master
Behram Kull (NSR)	1/12/2001	Pay	Behram Kull (NSR)	Head Master		Behram Kull (NSR)	Head Master
Behram Kull (NSR)		1-12-2001	Behram Kull (NSR)	Head Master		Behram Kull (NSR)	Head Master
Behram Kull (NSR)		30/11/2002	Behram Kull (NSR)	Head Master		Behram Kull (NSR)	Head Master
Behram Kull (NSR)		4/4/2003	Behram Kull (NSR)	Head Master		Behram Kull (NSR)	Head Master

Head Master
G. M. S.
Behram Kull
Mowbare Kalsa

Services verified in 30/11/2002 in Behram Kull & other records of the school

Head Master
GMS Behram Kull

Govt. High School
Behram Kull (NSR)

S. No. **PBP-** 0039835

Roll No. 17190



B
19

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan
Secondary School Certificate Examination
SESSION 1993 (SUPPLEMENTARY)
(HUMANITIES GROUP)

THIS IS TO CERTIFY THAT Mohammad Ibrahim Jan
Son/Daughter of Rahman Gul
and a resident of Charsadda District

has passed the Secondary School Certificate Examination
of the Board of Intermediate and Secondary Education, Peshawar held in October 1993.
as a *Private candidate*. He/She obtained 370 Marks out of 850
and has been placed in Grade D Representing Fair

The Candidate passed in the following subjects.

- | | | | |
|------------|---------------------|---------------------|-----------------|
| 1. English | 3. Islamiyat | 5. Gen: Science | 7. Isl: Studies |
| 2. Urdu | 4. Pakistan Studies | 6. Gen: Mathematics | 8. Pashto |

Date of birth according to admission form is Fourth April,
one thousand nine hundred and Seventy Six (04-4-1976)

Asstt. Secretary
30th December, 1993.

Head Master
GMS Kander (NSR)

Secretary

This certificate is issued without alteration or erasure.

ATTESTED

C
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SERVICE CERTIFICATE

Certified that Mr. Muhammad Ibrahim Jan S/O Rahman Gul has been working in Education Department as permanent Government servant, presently working as ^{NSO} Chowkidar at Government Primary School Kandar (Nowshera) since 15 - 05 - 1991

D. D. D. D. D.

SDEO (M)

Sub Divisional Education Officer, (M) Nowshera

ATTESTED

[Signature]

D
⑦

①6

GOVERNMENT OF NWFP
ESTABLISHMENT & ADMINISTRATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the 04 January, 2009

No.SOE-III(E&AD)1-8/2008:- In pursuance of provisions contained in sub-rules(2) of Rule-3 of the North West Frontier Province, the servants (Appointment, Promotion and Transfer) Rules, 1989, the Establishment and Administration Department in consultation with the Finance Department, hereby direct that in this Department's Notification No.SOR-1(S&GAD)4-2/82; dated 8th June, 1988, the following further amendments shall made namely:

AMENDMENTS

In the Appendix, for the existing entries in columns No.3, 4 and 5 against serial No.7, the following shall be substituted in the in the respective columns, namely:

(1)	Secondary School Certificate or equivalent qualification form a recognized Board; and	18030 years	(a) Thirty three percent by promotion, form amongst Daftaries and Naib Qasids or other equivalent posts with two yeas service as such who have passed Secondary School Certificate Examination; and
(ii)	A speed of 30 words per minutes in typing.		(b) Sixty seven percent by initial recruitment.

Note: For the purpose of promotion there shall be maintained a common seniority list of Daftaries and Naib Qasids etc with reference to the date of their acquiring the Secondary School Certificate:

Certified that:-

- (i) If two or more officials have acquired the Secondary School Certificate in the same session, the official having longer service shall rank senior to other officials, and
- (ii) Where a senior official dose not possess the requisite experience at the time of filling up a vacancy, the official next junior to him possessing the requisite experience shall be promoted in preference of the senior official or officials.

SECRETARY TO GOVERNMENT OF THE
NORTH WEST FRONTIER PROVINCE
ESTABLISHMENT & ADMINISTRATION DEPARTMENT.

ATTESTED

△

بخدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) صاحبنا ضلع نوشہرہ

درخواست براد محلی نہ ترقی

جناب عالی!

نوڈبانہ گزارش ہے کہ سائل محلہ تعلیم میں 16⁵/₁₉₉₁ سے بحیثیت جو کیدار تعینات ہیں۔ اور اپنے ذرائع خوش اسلوبی سے سرانجام دے رہا ہے۔ سکین جوان التمر اور تعلیم یافتہ ہیں۔ اور اسکی یہ صلاحیت ضائع ہو رہی ہے۔ تو سائل کی خواہش ہے کہ انکے علاوہ بھی محلہ کی مزید خدمت کر سکے۔

سائل کے کوائف درج ذیل ہیں۔

(1) محمد ابراہیم ولد رحمان گل

(2) ڈومیسائل جارمہہ حال نوشہرہ۔

(3) تعلیم ایف اے بلچ کمپیوٹر، ٹیٹسٹ

(4) سرمایہ سروس بلچ تھریہ

(5) تمام کوائف کے مصدقہ سرٹیفکیٹ درخواست کے ساتھ ہیں، لہذا بذریعہ درخواست التماس کی جاتی ہے کہ سائل کو ضلع میں ترقی کی خالی آسامی پر تعینات کر کے انکی یہ صلاحیت ضائع ہونے سے بچائیں۔ مزید ماحلات ممنون رہے گا۔

فقط آداب!

2014
Rajwali Khig
Head Master
GMS Kandar (NSR)

امرتیم یکیم ابریل

الحارص

آلہیہ ضلع نوشہرہ محمد ابراہیم خان جو کیدار سپرنٹنڈنٹ (نوشہرہ)

Dono - 27/5
2-6-2014

Forwarded to DEO (M)

Yousuf

Res (M)

2-6-2014

Head Master 01-04-2014
G.P.S.
Kandar (NSR)

ATTESTED

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BEFORE THE N.W.F.P. SERVICE TRIBUNAL, PESHAWAR.

19 'F'

APPEAL NO. 769/2008

Date of institution ... 30.05.2008
Date of decision ... 30.01.2009



Sharif Khan, Naib Qasid,
Office of the Political Agency, Khyber Agency..... (Appellant)

VERSUS

1. Regional Co-ordination Officer, Northern Region, Peshawar.
2. The Political Agent, Khyber Agency.
3. Mr. Haq Nawaz, Junior Clerk,
Political Agent's office Khyber Agency..... (Respondents)

APPEAL U/S 4 OF THE NWFP SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 24.4.08, WHEREBY JUNIOR NAIB QASID HAS BEEN PROMOTED AND AGAINST THE FINAL REJECTION ORDER DATED 24.5.2008, WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED FOR NO GOOD GROUNDS.

Mr. Muhammad Asif Yousafzai, Advocate..... (For appellant)
 Mr. Arshad Alam, A.G.P..... For official respondents
 Mr. Khalid Rehman, Advocate..... For respondent No.3

Mr. Justice (R) Salim Khan..... Chairman
 Mr. Bismillah Shah..... Member

JUDGMENT

JUSTICE (R) SALIM KHAN, CHAIRMAN:-

The appellant contended that he joined the respondent department as Naib Qasid on 1.5.1986. The name of the appellant was at the top of the seniority list. The appellant qualified SSC examination. The official respondents issued promotion order of private respondent No.3 (Haq Nawaz) in violation of seniority position on 24.4.2008. The appellant filed departmental appeal on 10.5.2008 against the said order but the same was rejected on 24.5.2008. The present appeal was filed on 30.5.2008. The departmental appeal and this service appeal are within time.

2. The respondents contested the appeal. It was contended by the respondent No.3 that this Tribunal had no jurisdiction, that the appellant passed SSC examination in 2007, that no appeal could be filed to Service Tribunal regarding the determination of fitness or otherwise of a person to be appointed to a higher

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post or grade. Respondent No.2 admitted that the name of the appellant was at the top of the seniority list but he was not considered for promotion for two reasons:-

- (i) that the appellant had qualified SSC examination in the year 2007 while respondent No.3 had qualified that examination in 1994, therefore, respondent No.3 was considered senior to the appellant,
- (ii) the age of the appellant was more than 45 years and he was not eligible for promotion in accordance with the Notification dated 18.8.1991.

4. We heard the arguments and perused the record.

5. The comments of Political Agent Khyber dated 21.5.2008 in his letter to the Regional Coordination Officer, Northern Region at Peshawar shows that the appellant was ignored for promotion for two reasons:

- (i) that he was over-age,
- (ii) that he was not so promoted in January 2007 also and the appellant had not objected to that order.

It means that the Political Agent had not taken up the point of passing of examination by respondent No.3 earlier in time during his mentioned correspondence, and the issue is an after-thought for the purposes of this appeal only.

6. The Notification No.E&A(A.D)4(17)/2003 dated 17.4.2004 is regarding the post of Daftari (and not the post of Junior Clerk). The issue of posting of the appellant as Daftari is not ^{under} discussion in this case, therefore, the mentioned rule is not applicable. It was for the official respondents to consider that who had passed SSC examination earlier in time, when they wanted to promote a person as Daftari.

7. The Notification No.SOE.IV(E&AD)/1-35/2002 dated 01.12.2006 was

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ATTESTED

EXAMINER
Khyber Pakhtunkhwa

ATTESTED

APPELLANT'S ADVOCATE
Service Tribunal

regarding amendment in column 5 against Serial No.9, in clause (b), of the Notification No.SOR-I (S&GAD)4-7/86(A), dated 21.12.1982. It contained that the words mentioned in clause (b) "and under 45 years of age" before semi-colon shall be deleted. Serial No.9 of the mentioned Appendix was regarding the post of Junior Clerk. The words "or below forty five years of age" stood deleted from the mentioned method of recruitment for the post of Junior Clerk. There was no conditional priority of passing SSC examination earlier in time for the purpose of seniority, though, as already mentioned, there was such a condition for the post of Daftari. The appellant, therefore, had to be retained as senior most when he passed examination in 2007 in spite of the fact that respondent No.3 had passed examination in 1994.

8. As for the issue of estoppel regarding promotion of another person as Junior Clerk in 2007 and silence by the appellant, it has come on record that the appellant passed SSC examination in ~~2007~~ 2007 only. He, therefore, had no cause of action against that person when he himself was not qualified by passing SSC examination. Silence of the appellant regarding the promotion of that person, even, if the appellant was qualified at that time, could be considered as estoppel in the case of that person only, but not as perpetual estoppel for all persons and for all times to come.

9. The official respondents appear to have mixed up the rules for the post of Daftari with the rules for the post of Junior Clerk, and did not pay attention to the amendment to the rules vide Notification dated 01.12.2006. It prejudiced the appellant and adversely affected his valuable right of consideration for promotion.

10. We, therefore, accept the present appeal, and direct the official respondents to consider the case of the appellant for promotion as Junior Clerk on the basis of merits and, if he is found fit and eligible, the appellant

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be promoted as Junior Clerk with effect from the date on which respondent No.3 was so promoted. The official respondents may either adjust respondent No.3 as Junior Clerk, but as junior to the appellant, if another post of Junior Clerk is available for him, or may revert him to his original post so that the only post of Junior Clerk becomes available for the appellant with effect from the date on which respondent No.3 was promoted as Junior Clerk to that post. The parties are, however, left to bear their own costs.

Bismillah Shah
(BISMILLAH SHAH)
MEMBER

[Signature]
(JUSTICE (R) SALIM KHAN)
CHAIRMAN

ANNOUNCED
30.01.2009

Certified to be true copy
[Signature]
MEMBER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Date of Presentation of Application	3-3-2011
Number of Words	1600
Copying Fee	10-00
Urgent	2-00
Total	12-00
Name of Copyist	H
Date of Completion of Copy	3-3-2011
Date of Delivery of Copy	3-3-2011

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[Signature]

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 1604/2010

Date of Institution. ... 17.08.2010
Date of Decision ... 21.10.2011



Mr. Yar Gul, Chowkidar,
G.P.S Charahgan, Mardan. ...

(Appellant)

VERSUS

1. The District Coordination Officer, Mardan.
2. The EDO (E&S.E), Mardan.
3. DPC through its Chairman, EDO (E&SE) Mardan.
4. Mr. Alamzeb J. Clerk, GGHS Bagoo Banda Mardan. ... (Respondents)

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 17.3.2010 WHEREBY JUNIOR OFFICIAL (RESPONDENT NO.4) HAS BEEN PROMOTED AS JUNIOR CLERK BY IGNORING THE APPELLANT AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN 90 DAYS.

MR. MUHAMMAD ASIF YOUSAFZAI,
Advocate. ...

For appellant

MR. TAHIR IQBAL,
Addl. Government Pleader ...

For official respondents

MR. NOOR MUHAMMAD KHATTAK,
Advocate. ...

For respondent No.4.

SYIED MANZOOR ALI SHAH,
MR. KHALID HUSSAIN ...

MEMBER

MEMBER

ATTESTED

JUDGMENT

SYIED MANZOOR ALI SHAH, MEMBER.- This appeal has been filed by appellant Yar Gul, against the order dated 17.3.2010, whereby junior to him was promoted while he was ignored. It has been prayed that on acceptance of the appeal, order dated 17.3.2010 may be set aside and the respondents may be directed to consider the appellant for promotion to the post of Junior Clerk under 33% quota reserved for promotion.

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2. Brief facts of the case are that the appellant joined the Education Department as Chowkidar vide order dated 31.10.1987. He passed SSC examination in the year, 1989 and FA in the year, 2009 during service. He was at S.No.6 of the seniority list of Class-IV servants while respondent No.4, who joined the department in the year, 1988 was at S.No.18 of the seniority list. The provincial Government had fixed 33% quota for promotion of matriculate Class-IV servants to the post of Junior Clerk. The appellant according to the said notification was entitled to be promoted as Junior Clerk. The respondent department promoted private respondent No.4 on 17.3.2010. Feeling aggrieved, the appellant filed departmental appeal 17.4.2010, which elicited no response within the statutory period, hence this appeal.

3. Notices were issued to the respondents. Respondents No. 1 to 3 have filed their joint written reply while private respondent No.4 filed written reply through his counsel and contested the appeal. The appellant also filed rejoinder in rebuttal.

4. Arguments heard and record perused.

5. The learned counsel for the appellant argued that the appellant was appointed as Chowkidar in the year, 1987. He passed SSC examination in the year, 1989 and FA in the year, 2009. He was at S.No.6 of the seniority list. On the other hand private respondent No.4 was appointed in the year, 1988 and was at S.No.18 of the seniority list. Therefore, the appellant had more right over private respondent No.4 for consideration for promotion to the post of Junior Clerk against 33% quota reserved for promotion amongst Class-IV civil servants. He further argued that respondent No.4 has been promoted as Junior Clerk while the appellant has been ignored. Moreover, condition of age limit had already been quashed by the august Supreme Court of Pakistan as well as this Tribunal in judgment dated 30.1.2009 in Service Appeal No. 2380/1997. He requested that the appeal may be accepted as prayed for.

6. Counsel for private respondent No.4 argued that as per Notification dated 1.2.2009, the age limit for promotion to the post of Junior Clerk is upto 30 years, whereas the appellant is over and above 45 years of age, therefore, he is not entitled to be promoted to the post of Junior Clerk. On the other hand, the appellant being qualified, eligible and within the prescribed age limit rightly been promoted as Junior Clerk. He further argued that that the Tribunal has no jurisdiction to give directions to the respondent department to fill the posts in promotion quota. He relied on PLD-1994-Supreme Court-539. He requested that the appeal may be dismissed.

7. Perusal of record would show that the appellant was at S.No.6 while private respondent No. 4 was at S.No. 18 of the seniority list of Class-IV of the respondent department. Private respondent No.4 was promoted as Junior Clerk under 33% quota reserved for promotion while the appellant was ignored on the plea that he had crossed the

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upper age limit, otherwise he was fully qualified to be promoted against the post of Junior Clerk. Since condition of upper age limit had already been quashed by the august Supreme Court of Pakistan, therefore, he was entitled to be considered for promotion alongwith his colleagues and by not doing so, he has been discriminated.

In view of the above, the appeal is accepted, and the respondent department is directed to consider the appellant for promotion against the post of Junior Clerk from the date when his juniors were promoted. No order as to costs. File be consigned to the record.

ANNOUNCED
1.10.2011

(INOOR ALI KHAN)
MEMBER

(SYED ANZOR ALI SHAH)
MEMBER

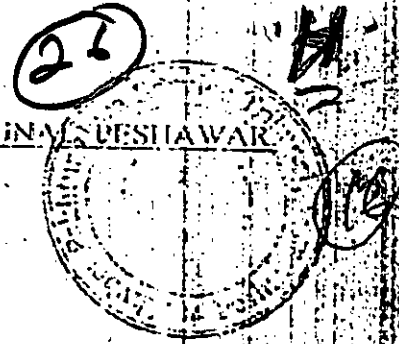
Certified to be a true copy

EX-100
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Date of Presentation of Application 28.12.2011
No. of Application 1200
Category 8
Level 2
Total 10
Name [Signature]
Date of Birth 28.12.2011
Date of Entry into Service 28.12.2011

ATTESTED

[Signature]



Appeal No. 104/2011

Date of Institution. ... 22.1.2011
Date of Decision ... 11.1.2012

Mr. Zahoor Jan, Junior Clerk, Government High School No.1, Nowshera Kalan... (Appellant)

VERSUS

1. The District Coordination Officer, Nowshera.
2. The EDO(E&S.E), Nowshera.
3. The Secretary Government of Khyber Pakhtunkhwa, Finance Department, Peshawar. (Respondents)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR GRANTING FULL MONITORY BENEFITS OF JUNIOR CLERK GRADE AND SCALE SINCE 13.2.2010 TILL DATE AND ONWARDS, AND FOR REGULAR PROMOTION TO JUNIOR CLERK UNDER 33% QUOTA.

MR. MUHAMMAD ASIF YOUSAFZAI, Advocate. ... For appellant.

MR. TAHIR IQBAL, Addl. Government Reader. ... For respondents.

MR. SULTAN MAHMOOD KHATTAK, ... MEMBER
MR. NOOR ALI KHAN, ... MEMBER

JUDGMENT

SULTAN MAHMOOD KHATTAK, MEMBER: This appeal has been filed by Zahoor Jan, the appellant, under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 for granting full monitory benefits of the post of Junior Clerk and since 13.2.2010 for regular promotion to Junior Clerk under 33% quota. It has been prayed that on acceptance of the appeal, the respondents may be directed to grant pay benefits of higher scale (Junior Clerk post) w.c.f. 13.2.2010 with all consequential benefits. The respondents may further be directed to consider the appellant for regular promotion to Junior Clerk post under 33% quota fixed by the Government.

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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR
11/1/2012

ATTORNEY

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2. Brief facts of the case are that the appellant joined the respondent department on 3.10.1993 as Laboratory Attendant. The appellant has more than 17 years service at his credit with qualification of M.A. He was adjusted against the post of Junior Clerk (BPS-7) in his own pay and scale, by the competent authority, vide order dated 13.2.2010. The Government of Khyber Pakhtunkhwa has fixed the 33% quota for Class-IV, having the qualification of SSC for promotion against the post of Junior Clerk but the appellant has not been considered for promotion till date. The appellant filed departmental appeal on 7.10.2010, which elicited no response within the statutory period, hence the present appeal.

3. The appeal was admitted to regular hearing on 22.3.2011 and notices were issued to the respondents for submission of written reply. Respondents have filed their joint written reply and contested the appeal. Rejoinder was also filed in rebuttal. Arguments heard and record perused.

4. The learned counsel for the appellant argued that the appellant was appointed as Laboratory Attendant on 3.10.1993, having the qualification of SSC. He further acquired qualification of M.A during service. Being highly qualified, the appellant was adjusted as Junior Clerk on 13.2.2010 in his own pay and scale instead of consideration on regular basis. Even without monetary benefits, which is against the verdict of august Supreme Court of Pakistan. Moreover, the Hon'ble Tribunal in Service Appeal No. 59/2006, decided on 15.6.2006 allowed monetary benefits in accordance with the law. So far as the question of seniority is concerned, it was the responsibility of the respondent department to issue seniority list on yearly basis. He stated that the matter pertains to terms and conditions of service of the appellant, thus Tribunal has ample jurisdiction to entertain the present appeal. In this connection, the learned counsel for the appellant relied on PLD 2006 Supreme Court 246 (b). Counsel for the appellant referred to Service Appeal No. 1604/2010, decided on 21.1.2011, that this Hon'ble Tribunal has directed the respondents to consider the appellant for promotion with effect from the date junior to him were promoted. Moreover, cases of similar nature have already been decided in favour of the appellants in Service appeals No. 769/2008. Counsel for the appellant also produced copy of order No. 4235-39, dated 1.10.2009, whereby one Mr. Imad ud Din Naib Qasid holding diploma of "Associate Engineer" has been promoted against the vacant post of Junior Clerk against 33% quota which is junior to the appellant. He requested that the appeal may be accepted as prayed for.

The learned AGP argued that it is true that the appellant was adjusted as Junior Clerk on 13.2.2010 but in his own pay and scale. So he is not entitled to receive

ATTESTED

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GOVERNMENT OF KHYBER PAKHTUNKHWA
 LABORATORY ATTENDANT
 PESHAWAR

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(28) (18)

salary of that post. Since the appellant has not been considered for regular promotion and will be considered on his turn on the basis of 33% quota reserved for promotion. Moreover, there is no record produced by the appellant which show that the appellant is most senior official in class-IV employees. He requested that the appeal may be dismissed.

6. The Tribunal observes that the respondents have never maintained any list pertaining to 33% quota fixed for Class-IV employees and the respondents exercising pick and choose while promoting Class-IV employees to the post of Junior Clerk. The appellant has been posted as Junior Clerk in his own pay and scale and deprived of his promotion due to no valid reasons and improper exercise of discretion. As reported in PLD 2006 Supreme Court 246 (b) in case of depriving a civil servant of his legitimate right of promotion in an illegal manner and by improper exercise of discretion, this Tribunal has the jurisdiction under Section 4 (b) (i). The matter pertains to terms & conditions of service of the appellant which have been violated. The Tribunal further observes that the appellant has been made to work on higher post without benefits attached to that post which is violative of basic rights and according to the judgments of the august Supreme Court ^{as reported in the PLD 1994 Supreme Court 2331 (b)} and this Tribunal judgment in Service Appeal No. 59/2006 dated 15.6.2006, the appellant is fully entitled to receive salary of that post. There were clear vacancies of Junior Clerk available in 33% quota which was never observed strictly in accordance with law and rules and keeping seniority positions of the Class-IV employees. The respondent No.2 has made order in own pay and scale basis instead of regular promotions which is against the law. One Mr. Imadud Din has been promoted which is junior to the appellant.

7. In view of the above, the appeal is accepted, and the respondent department is directed to consider the appellant alongwith others against the posts lying vacant in 33% promotion quota immediately from the date when vacancy was available for them within 90 days with all service benefits from that date. The appellant is also entitled to full pay benefits of the post of Junior Clerk post from the date of adjustment as Junior Clerk in own pay and scale. Parties are left to bear their own costs. File be consigned to the record.

8. This order will also dispose of connected Service Appeal No. 323/2011 Ifikhar Ali Versus DCO, Nowshera and others, in the same manner.

ANNOUNCED
11.1.2012

(NOOR ALI KHAN)
MEMBER

(SULAIMAN MAHMOOD KHATTAK)
MEMBER

ATTESTED

Certified to be a true copy
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

VAKALAT NAMA

29

NO. _____/20

IN THE COURT OF Service Tribunal, Peshawar

Muhammad Ibrahim Jan (Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Education Department (Respondent)
(Defendant)

I/We Muhammad Ibrahim Jan

By Taimur Ali Khan
Adv

Do hereby appoint and constitute **M. Asif Yousafzai, Advocate, Peshawar,** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/20

[Signature]

(CLIENT)

ACCEPTED

[Signature]

M. ASIF YOUSAFZAI
Advocate

[Signature]
TAIMUR ALI KHAN
Advocate

M. ASIF YOUSAFZAI
Advocate High Court,
Peshawar.

OFFICE:

Room No.1, Upper Floor,
Islamia Club Building,
Khyber Bazar Peshawar.
Ph.091-2211391-
0333-9103240

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Appeal No 1103/2014

Mr. Ibrahim Jan.....Appellant

VERSUS

1- Secretary (E & S) Education Khyber Pakhtunkhwa, Peshawar & others.
..... Respondents

Respectively Sheweth

Written comments/reply on behalf of respondent No 1,2,3,4

Preliminary Objections

1. That the Appellant has no cause of action/locus standi to file the instant appeal.
2. That this honorable service tribunal has got no jurisdiction to entertain the present appeal.
3. That the present Appeal is bad for non-joinder and mis joinder of necessary parties.
4. That the instant appeal is badly time barred.
5. That the appellant has concealed material facts from this honorable service tribunal.
6. That the appellant is estopped by his own conduct, by deed and by law to file the instant appeal.
7. That the instant appeal is not maintainable in its present form.

Factual Objection

- 1 Pertains to the petitioner record.
- 2 Pertains to the petitioner record.
- 3 Correct to the extent that 33% quota is fixed for promotion from class-IV to ^{the post of} junior clerk. The remaining para is incorrect. The appellant is at serial No. 33 at the seniority list of class-IV employees and will be considered for promotion on his own turn.
- 4 Incorrect, ^{has been} no departmental appeal filed by the Appellant.

Grounds:

- A. Incorrect. The appellant is at S.No.33 at the seniority list of class-IV and will be considered for promotion on his own turn.(copy of seniority list is Annexure-A)
- B. Incorrect. The appellant is at SNo.33of the seniority list. He has to wait for his turn as already lots of Civil Servants/Officials are senior to him.
- C. Incorrect. As explained above.
- D. Incorrect. An inquiry was constituted by the Director (E&SE), the inquiry officer made some recommendations regarding those officials who do not deserve and got promotion to Junior Clerk and also all those officials who mislead the Court and get illegal & without turn promotion will be proceeded against:as Departmental action is taken against them in the light of the recommendations of the inquiry report (Annexure-B).
- E. Pertains to the record however detail reply has already been given in Para-A.
- F. Incorrect.
- G. The Respondents also seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, requested before your honour that the present appeal is illegal, against facts and without force, may kindly be dismissed with cost.


Respondent No.1


Secretary (E&S) Education Department,
Govt: of KPK.

Respondent No.2,3


District Education Officer (M)
Nowshera

Respondent No.4


Secretary Finance Department,
Govt: of KPK.


So (Wks)

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

Service Appeal No. 1103/2014

Muhammad Ibrahim Jan VS Education Deptt:

.....

REJOINDER ON BEHALF OF APPELLANT

.....

RESPECTFULLY SHEWETH:

Preliminary Objections:

(1-7) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

FACTS:

- 1 Admitted correct by the respondents as the service record of the appellant is in the custody of respondent department.
- 2 Admitted correct by the respondents as the service record of the appellant is in the custody of the respondent department.
- 3 First portion of the para is admitted correct, hence no comments. While the remaining portion of the para is incorrect as many juniors to the appellant were promoted while the appellant was deprived from his due right of promotion.
- 4 Incorrect. The appellant has filed departmental appeal, which is attached as annexure-E with the appeal.


GROUND:

- A) Incorrect. Many juniors to appellant were promoted while the appellant was deprived from his legal right of promotion.
- B) Incorrect. While Para B of the appeal is correct.
- C) Incorrect. Many juniors to appellant were promoted while the appellant was deprived from his legal right of promotion under 33% reserved quota.
- D) Incorrect. The Deptt: itself promoted the most junior person under 33% quota who were juniors to the appellant, thus the Deptt: itself committing irregularities on basis of nepotism in the promotion of junior clerks under 33% quota and deprived many seniors including the appellant from his due right of promotion.
- E) Not replied according to para E of the appeal. Moreover para E of the appeal is correct.
- F) Incorrect. The appellant has not been treated according to law, rules governing the 33% quota of the appellant.
- G) Legal.

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

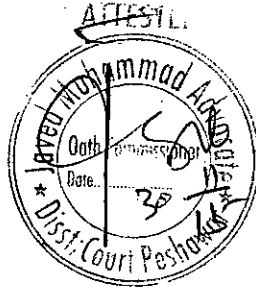
APPELLANT
Muhammad Ibrahim Jan

Through:


(M. ASIF YOUSAFZAI)
ADVOCATE, PESHAWAR.

AFFIDAVIT

It is affirmed and declared that the contents of rejoinder are true and correct to the best of my knowledge and belief.



Rai
DEPONENT

10

Annex A

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ELEMENTARY & SECONDARY EDUCATION, NOWSHERA

Tentative Seniority List of Class-IV OF Ele: & Secy: Education, Nowshera

S #	Name of Class-IV	Father's Name	Designation	Dimicil e	Name of School	Qualificatio n	Date of Birth	Date of 1st Appt: in Edu: Deptt:	Date of taking over charge	Date of taking over charge in this Distt:	Mobile #
1	Gohar Ali Shah	Maraham Shah	N/Q	NSR	GMS, Wali	S.S.C	29/02/1956	09/01/1975	09/01/1975	09/01/1975	0344-9140684
2	Bakht Ali	Khan Zaman	Lab: Attend	NSR	GHS, Khesghi Bala	S.S.C	03/01/1957	21/09/1981	21/09/1981	21/09/1981	0923-640121
3	Rahat Shah	Bakhari Shah	Lab: Attend	NSR	GHSS, Akbar Pura	S.S.C	14/09/1966	15/09/1984	15/09/1984	15/09/1984	0307-7120151
4	Jan Khan	Gulab	N/Q	NSR	GHS, Khesghi Bala	S.S.C	10/04/1967	16/09/1985	16/09/1985	16/09/1985	0923-640121
5	Munawar Shah	Rasool Shah	Chowkidar	NSR	GHS, Aza Khel Bala	S.S.C	10/10/1961	02/05/1986	02/05/1986	02/05/1986	0342-3170313
6	Wilayat Khan	Khan Sharif	Chowkidar	NSR	GPS Mohib Banda	FA, PTC	08/05/1959	12/01/1987	12/01/1987	12/01/1987	0332-9011539
7	Akhter Munir	Adam Khan	Chowkidar	NSR	GPS Dag Behsud No2	S.S.C	17/04/1972	10/09/1987	10/09/1987	10/09/1987	
8	Mukhtaj ud Din	Lal Din	N/Q	NSR	GHS, Jarooba	S.S.C	15/05/1955	21/10/1987	21/10/1987	21/10/1987	0301-5092610
9	Iqbal Husain	Malang Khan	Chowkidar	NSR	GHS, Jarooba	S.S.C	04/01/1967	29/10/1987	29/10/1987	29/10/1987	
10	Khalid Khan	Hassan Khan	Chowkidar	NSR	GPS Gul Rehan	S.S.C	01/01/1968	29/10/1987	29/10/1987	29/10/1987	
11	Taj Rahim	Abur Rahim	Chowkidar	NSR	GHSS, Nizampur	S.S.C	02/01/1958	07/01/1988	07/01/1988	07/01/1988	
12	Nazir Ahmad	Abdur Raziq	Chowkidar	NSR	GPS, Kund	S.S.C	14/09/1969	26/01/1988	26/01/1988	26/01/1988	
13	Amreesh Khan	Muhammad Amin	Lab: Attend	NSR	GPS, No.1 Akora	S.S.C	10/02/1966	14/02/1988	14/02/1988	14/02/1988	0333-9049839
14	Fida Muhammad	Feroz Khan	N/Q	NSR	GHS, Mughalkai	S.S.C	13/12/1970	01/06/1988	01/06/1988	01/06/1988	0300-5376656
15	Rang Wali Shah	Abdul Ghafoor Shah	Chowkidar	NSR	GHS, Spin Khak	S.S.C	03/12/1967	11/06/1988	11/06/1988	11/06/1988	0334-9900251
16	Saeed Ullah	Mohabat Shah	Chowkidar	NSR	GPS.1 Azakhel Payan	S.S.C	04/10/1965	21/09/1988	22/09/1988	22/09/1988	0300-5895620
17	Niaz Muhammad	Qader Shah	Chowkidar	NSR	GPS.2 Pabi	S.S.C	10/10/1970	27/09/1988	27/09/1988	27/09/1988	0333-9261461
18	Farzand Ali	Noor Bad shah	Chowkidar	NSR	GPS Dag Behsud No1	S.S.C	04/03/1968	04/11/1988	04/11/1988	04/11/1988	
19	Ihsan Ul Haq	Fazli Rahman	Chowkidar	NSR	GPS, No:1-Mulla Killi	S.S.C	10/01/1961	30/10/1989	11/01/1989	11/01/1989	
20	Hamid Afzal	Sher Afzal	Behishti	NSR	GPS, Sherin Koty	S.S.C	02/04/1971	07/09/1989	07/09/1989	07/09/1989	0300-9239507
21	Muhammad Ismail	Sher Bahadar	Lab: Attend	Chard	GHS, No.2 Pir Pai	S.S.C	14/05/1964	09/09/1989	09/09/1989	09/09/1989	0300-9367253
22	Mehrab Gul	Ziarat Gul	N/Q	NSR	GHS, Aman Garh	S.S.C	01/04/1972	11/10/1989	11/10/1989	11/10/1989	0331-4326943
23	Mir Haider	Sadbar Gul	Chowkidar	NSR	GHS, Badrashi	S.S.C	12/09/1973	20/12/1989	20/12/1989	20/12/1989	0301-3011694
24	Haider Khan	Muzamil Shah	Chowkidar	NSR	GPS Ashakel	S.S.C	14/08/1969	05/02/1990	05/02/1990	05/02/1990	
25	Fazal Ahmad Shah	Mazroob Shah	Chowkidar	NSR	GPS No1 Cantt	S.S.C	02/04/1959	11/04/1990	11/05/1990	11/05/1990	
26	Syed Zahir Shah	Sayed Usman Shah	N/Q	NSR	GPS Gul Rehan	F.A	02/11/1972	01/07/1990	01/07/1990	01/07/1990	0333-9045825
27	Sanam Gul	Farid Gul	Lab: Attend	NSR	GHS, Taru Jabba	M.A / B.Ed	05/03/1969	15/10/1990	15/10/1990	15/10/1990	
28	Ali Muhammad	Saeed Said	Chowkidar	NSR	GHS, Mali Khel Bala	S.S.C	14/06/1970	20/11/1990	20/11/1990	20/11/1990	
29	Mir Azam Khan	Saeedullah Khan	N/Q	NSR	GPS, Sees Mandi	S.S.C	06/11/1969	01/01/1991	01/01/1991	01/01/1991	0345-9868120
30	Noor ul Islam	Muhamma Ishaq	Chowkidar	NSR	GMS, Hisar Tang	S.S.C	20/03/1970	18/01/1991	18/01/1991	18/01/1991	
31	Aziz ul Akbar	Sadiq Akbar	Chowkidar	NSR	GPS, sheikh Ahmad Baba	S.S.C	25/11/1961	02/02/1991	02/02/1991	02/02/1991	
32	Tufail	Pervaz	Sweeper	NSR	GPS, Darwazgai	F.A	06/11/1974	08/05/1991	08/05/1991	08/05/1991	
					EDO(E & SE) Nowshera	S.S.C	04/04/1976	16/05/1991	16/05/1991	16/05/1991	

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ELEMENTARY & SECONDARY EDUCATION, NOWSHERA

Tentative Seniority List of Class-IV OF Ele: & Secy: Education, Nowshera

S #	Name of Class-IV	Father's Name	Designation	Dimicil e	Name of School	Qualificatio n	Date of Birth	Date of Ist Apptt: in Edu: Deptt:	Date of taking over charge	Date of taking over charge in this Distt:	Mobile #
34	Muhammad Ibrahim	Rehman Gul	Chowkidr	Chd	GPS, Kandar	S.S.C		16/05/1991	16/05/1991	16/05/1991	
35	Riaz Amin	Hazrat Umar	Chowkidar	NSR	GPS A C Center	S.S.C	19/05/1997	18/05/1991	18/05/1991	18/05/1991	
36	Muhammad Tariq	Abdur Rauf	Chowkidar	NSR	GPS, Risal garh	F.A	10/06/1956	01/10/1991	01/10/1991	01/10/1991	
37	Zafar Iqbal	Musharaf Khan	Lab: Attend	NSR	GHS, Dag Behsud	S.S.C	06/01/1975	21/10/1991	21/10/1991	21/10/1991	0312-5771794
38	Mushtaq Khan	Abdul Ghaffar	Mali	NSR	GHS, Aman Garh	S.S.C	21/09/1962	13/11/1991	13/11/1991	13/11/1991	
39	Nosherawan Khan	Sher Afzal	Lab: Attend	NSR	GHSS, Jalozai	F.A	03/10/1970	07/01/1992	07/01/1992	07/01/1992	0331-4704922
40	Jan Alam	Fazli Elahi	Sweeper	Chd	GHS, Mulla Killi	F.A	15/03/1964	01/06/1992	01/06/1992	01/06/1992	0345-9087327
41	Fida Muhammad	Tayyeb ur Rahman	Sweeper	Chard	GHS, Khesghi Bala	B.A / C.T	16/06/1961	23/09/1992	23/09/1992	23/09/1992	0923-640121
42	Abdur Rahman	Raza Khan	Sweeper	Chd	GHSS, Khesghi Payan	B.A	09/10/1975	20/10/1992	20/10/1992	20/10/1992	
43	Raees Khan	Fareed Khan	N/Q	Chard	GHS, Khesghi Bala	S.S.C	05/03/1975	15/11/1992	15/11/1992	15/11/1992	0923-640121
44	Khial Nawab	Khanadin	Chowkidar	NSR	GHS, Phari Karti Khel	S.S.C	16/01/1971	01/01/1993	01/01/1993	01/01/1993	
45	Falak Naz	Musharaf Khan	Mali		GHS, Tarkha	S.S.C	01/04/1966	18/04/1993	18/04/1993	18/04/1993	0315-9208925
46	Muhammad Ajmal	Luqman din	Behishti	NSR	GHS, No.1 Shaidu	S.S.C	12/05/1972	29/09/1993	29/09/1993	29/09/1993	
47	Khalid.Khan	Aseem Khan	Behishti	Swabi	GHS, Adamzai	S.S.C	10/06/1967	03/10/1993	03/10/1993	03/10/1993	0346-9545717
48	Nadeem Akhtar	Ali Akbar	N/Q	NSR	GCMHS, Akora Khattak	S.S.C	01/05/1970	05/10/1993	05/10/1993	05/10/1993	0336-9432128
49	Inam Ullah	Faqir Muhammad	N/Q	Pesh	GMS, Chowki Mamrez	S.S.C	02/01/1977	19/10/1993	19/10/1993	19/10/1993	0313-9709463
50	Walayat Khan	Zarbat Khan	N/Q	NSR	GMS, Spin Kana Kalan	F.A	09/05/1969	20/10/1993	20/10/1993	20/10/1993	0305-9728919
51	Muzamel Khan	Zulkifal	N/Q	NSR	GHS, Tarkha	S.S.C	25/12/1971	14/05/1994	14/05/1994	14/05/1994	0344-5904144
52	Muhammad Shabir	Usra Khan	Chowkidar	NSR	GPS, Shaheen Abad	S.S.C	10/11/1975	31/08/1994	31/08/1994	31/08/1994	
53	Shahma Gul	Samir Gul	Chowkidar	NSR	GPS, Rokhan abad	F.A	03/03/1970	11/01/1995	11/01/1995	11/01/1995	
54	Taila Muhammad	Ghulam Haider	Chowkidar	NSR	GPS, Duran abad	S.S.C	02/01/1952	11/01/1995	11/05/1995	11/01/1995	
55	Abdul Hanan	Shamran Khan	N/Q	NSR	GMS, Kana Khel	S.S.C	01/01/1975	01/02/1995	01/02/1995	01/02/1995	0347-9014601
56	Awal Khan	Khan Said	Chowkidar	NSR	GPS No 2 Shaikhi	S.S.C	20/10/1976	11/06/1995	11/07/1995	11/07/1995	
57	Saeedur Rahman	Habibul Rahman	Behishti	NSR	GHS, Zakhi Qabristan	S.S.C	13/04/1977	01/09/1995	01/09/1995	01/09/1995	0301-8833859
58	Shabir ud Din	Lal Din	Chowkidar	NSR	GPS, Namdar khel	S.S.C	01/07/1970	10/10/1995	10/10/1995	10/10/1995	
59	Khurshid Zada	Khan Zada	Lab: Attend	NSR	GHS, Kahi	S.S.C	02/02/1976	01/01/1996	01/01/1996	01/01/1996	0302-3514508
60	Sher Badshah	Mir Badshah	Chowkidar	NSR	GPS, Chashmai	S.S.C	24/02/1963	30/04/1996	30/04/1996	30/04/1996	0334-8952877
61	Gul Faraz	Maiva Gul	Chowkidar	NSR	GPS Mairaji Payan	S.S.C	17/12/1978	10/10/1996	17/10/1996	17/10/1996	
62	Amir Gul	Habib Gul	Kbakroob	NSR	GHS, No.1 Shaidu	S.S.C	07/08/1974	12/11/1996	12/11/1996	12/11/1996	
63	Javid Khan	Hameedul Ghafoor	Sweeper	NSR	GMS, Islamabad	F.A	20/04/1972	23/06/1997	23/06/1997	23/06/1997	0332-9018246
64	Wajid Khan	Abdul Rahman	Chowkidar		GHS, Tarkha	S.S.C	04/09/1974	25/06/1997	25/06/1997	25/06/1997	0303-5886412
65	Abas Khan	Muhammad Yousaf	N/Q	Mrd	GMS, A.SC Colony	S.S.C	13/03/1978	23/09/1997	23/09/1997	23/09/1997	0343-9874665
66	Ibrahim Khan	Hameed Khan	Lab: Attend	NSR	GHSS, Khesghi Payan	M.A	03/01/1971	02/05/1998	02/05/1998	02/05/1998	

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ELEMENTARY & SECONDARY EDUCATION, NOWSHERA

Tentative Seniority List of Class-IV OF Ele: & Secy: Education, Nowshera

S#	Name of Class-IV	Father's Name	Designation	Domicile	Name of School	Qualification	Date of Birth	Date of 1st Apptt: in Edu: Deptt:	Date of taking over charge	Date of taking over charge in this Distt:	Mobile #
67	Muhammad Asif	Ghulam Muhammad	Lab: Attend	NSR	GHSS, Khesghi Payan	F.A	08/05/1973	02/05/1998	02/05/1998	02/05/1998	
68	Khan Muhammad	Mian Khan	Chowkidar	NSR	GHS, Adamzai	S.S.C	09/11/1967	01/10/1998	01/10/1998	01/10/1998	0321-9898010
69	Bahar Ali	Gohar Ali	Chowkidar	NSR	GPS, Rashakai	S.S.C	03/04/1979	16/10/1998	17/10/1998	17/10/1998	
70	Abid Muhammad	Fazal Muhammad	N/Q	NSR	GHSS, Khesghi Payan	F.A	02/03/1972	28/10/1998	28/10/1998	28/10/1998	
71	Hamid Ali	Janas Khan	Mali	NSR	GHS, Rashakai	S.S.C	15/11/1979	08/12/1998	08/12/1998	08/12/1998	0300-5714732
72	Ashraf Ali	Khidmat Ali	Khakrob	NSR	GHS, L.C Aman Garh	S.S.C	01/03/1969	17/12/1998	17/12/1998	17/12/1998	0345-9307385
73	Anwar Khan	Muh. Ilyas Khan	Chowkidar	NSR	GHS, Dag Behsud	S.S.C	03/03/1970	26/12/1998	26/12/1998	26/12/1998	0315-9706477
74	Muhammad Ayaz	Muhammad Sharif	Lab: Attend	NSR	GHSS, Khesghi Payan	M.A	31/03/1971	31/12/1998	31/12/1998	31/12/1998	
75	Shoukat Ali	Gul Rehman	Lab: Attend	NSR	GHS, Samandar Ghari	F.Sc	30/12/1972	14/01/1999	14/01/1999	14/01/1999	0333-9003731
76	Faqir Taj	Mahabat Khan	Lab: Attend	NSR	GMS, Misri Banda	F.A	25/07/1973	01/02/1999	01/02/1999	01/02/1999	0333-9023188
77	Sher Dil Khan	Ashraf Khan	Lab: Attend	NSR	GHSS, Khairabad	S.S.C	03/10/1971	19/02/1999	19/02/1999	19/02/1999	0333-9325977
78	Fazli Rabi	Noor Zada	Lab: Attend	NSR	GHSS, Khairabad	S.S.C	15/07/1973	19/02/1999	19/02/1999	19/02/1999	0333-9039912
79	Zulfiqar	Imran Gul	N/Q	NSR	GHSS, Khairabad	S.S.C	22/12/1974	19/02/1999	19/02/1999	19/02/1999	0333-9012979
80	Shah Nawaz	Shah Zaman	Lab: Attend	NSR	GHSS, Khairabad	M.A	10/11/1977	19/02/1999	19/02/1999	19/02/1999	0333-9040109
81	Rabi Ullah	Zaman Khan	Sweepor	NSR	GMS, Aza Khel Bala	S.S.C	08/01/1972	01/03/1999	01/03/1999	01/03/1999	0346-5670879
82	Muhammad Jehanzeb	Khwaja Ihtaf Hussain	Lab: Attend	NSR	GHSS, Manki Sharif	F.A	11/09/1967	11/03/1999	11/03/1999	11/03/1999	0333-9188357
83	Zahoor Hussain	Mir Hassan	N/Q	NSR	GHS, Mohib Banda	S.S.C	02/01/1961	17/04/1999	17/04/1999	17/04/1999	0334-9113431
84	Muhammad Zafar	Muhammad Nisar	Lab: Attend	NSR	GHS, Baghban Pura	S.S.C	10/04/1974	23/04/1999	23/04/1999	23/04/1999	0333-9027484
85	Ismail shahid	Iscar ud din	Chowkidar	NSR	GPS, No.2 Bara Banda	B.A	02/05/1979	30/12/1999	30/12/1999	30/12/1999	
86	Akbar Hayat	Hidayat Ullah	Chowkidar	NSR	GPS, No.1 Risal Pur	S.S.C	03/04/1976	31/12/1999	31/12/1999	31/12/1999	
87	Ikrani ud Din	Rahman ud Din	Khakroob	NSR	GHS, No.1 Shaidu	B.A / JDPE	12/12/1978	08/01/2000	08/01/2000	08/01/2000	
88	Noor Zada	Sahib Zada	N/Q	NSR	GHS, No.1 Shaidu	S.S.C	23/09/1977	30/06/2000	30/06/2000	30/06/2000	
89	Haqueon ur Rasheed	Nisar Ahmad	Lab: Attend	NSR	GHSS, Manki Sharif	S.S.C	24/04/1970	01/07/2000	01/07/2000	01/07/2000	0332-4544325
90	Qasim shah	Sharif ud din	Chowkidar	NSR	GPS, No2 Mulla Killi	F.A	13/04/1983	05/03/2001	05/03/2001	05/03/2001	
91	Asad ali	Noor Muhammad	Chowkidar	NSR	GPS, Suhbat Korrana	S.S.C	02/05/1983	25/04/2001	25/04/2001	25/04/2001	
92	Zia ur Rahman	Gul Mast	Chowkidar	NSR	GHS, Rashakai	S.S.C	24/05/1983	31/05/2001	31/05/2001	31/05/2001	0300-5775859
93	Naveed Khan	Liaqat Ali	Behishti	NSR	GHS, Banda Sheikh Ismail	S.S.C	25/03/1983	01/12/2002	01/12/2002	01/12/2002	0302-2383815
94	Shahir ahmad	Sharif ud din	Chowkidar	NSR	GPS, No2 Mulla Killi	B.A	15/03/1988	23/09/2003	23/09/2003	23/09/2003	
95	Abdul Khalig	Abdul Malik	Behishti	Chard	GHS, Aman Garh	S.S.C	24/03/1959	07/01/1998	07/01/2004	07/01/2004	0315-9594713
96	Zafar Ali Khan	Guldar Khan	Chowkidar	NSR	GHS, Mughalkai	S.S.C	01/04/1980	01/03/2004	01/03/2004	01/03/2004	0334-9434569
97	Ihsanul Haq	Irfaul Haq	Behishti	NSR	GHS, No.1 Nowshera Cantt.	M.A	15/04/1986	30/04/2004	30/04/2004	30/04/2004	0313-5770919
98	Gul Zada	Khan Zada	Chowkidar	NSR	GPS Khaisri	S.S.C	01/03/1982	11/11/2004	22/11/2004	22/11/2004	
99	Akbar Hussain	Fazal Akbar	Chowkidar	NSR	GPS Pushtoon Ghari	S.S.C	02/02/1977	22/11/2004	23/11/2004	23/11/2004	0336-8664830

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S #	Name of Class-IV	Father's Name	Designation	Dimicil e	Name of School	Qualificatio n	Date of Birth	Date of Ist Appt: in Edu: Deptt:	Date of taking over charge	Date of taking over charge in this Distt:	Mobile #
100	Mujahid ali	Tita Muhammad	Chowkidar	NSR	GPS, Sherin Koty	S.S.C	02/05/1986	13/05/2005	13/05/2005	13/05/2005	
101	Muhammad Kamran	Rahim Ullah	Chowkidar	NSR	GPS, Riahim Ullah Koroono	S.S.C	17/02/1979	06/01/2006	06/01/2006	06/01/2006	
102	Adnan ali	Liaqat ali	Chowkidar	NSR	GPS, No2 Risa Pur	S.S.C	16/05/1988	11/01/2006	11/01/2006	11/01/2006	
103	Bahar Ali	Taj Muhammad	N/Q	Swabi	GHS, Jehangira Road	M.A	06/03/1987	07/02/2006	07/02/2006	07/02/2006	33290154
104	Utihar Ali Shah	Muhammad Nabi	Chowkidar	NSR	GPS No3 ZKKS	S.S.C	04/10/1982	21/09/2006	10/02/2006	10/02/2006	
105	Magsood Ahmad	Safdar Khan	Chowkidar	NSR	GPS, Marhatti Banda	S.S.C	05/02/1986	23/02/2006	23/02/2006	23/02/2006	
106	Pervaz Khan	Muhammad Ali Khan	L/Att	NSR	GHS, Mian Issa	S.S.C	04/03/1976	21/09/2006	21/09/2006	10/03/2006	
107	Raees Khan	Shamas Khan	Chowkidar	NSR	GHS, Mian Issa	S.S.C	03/12/1976	21/09/2006	10/04/2006	10/04/2006	
108	Sayed shahid Iqbal	Syed Ghani shah	Chowkidar	NSR	GPS, No:1 Kuttar Pan	B.A	02/03/1982	03/07/2006	03/07/2006	03/07/2006	
109	Shamshad Khan	Sardaraz Khan	Chowkidar	NSR	GHS, Afrido Killi	S.S.C	11/02/1962	21/09/2006	21/09/2006	21/09/2006	333900127
110	Nabi Amin	Rooh Ul Amin	Chowkidar	NSR	GPS, No2 Kuttar Pan	S.S.C	04/12/1988	21/09/2006	21/09/2006	21/09/2006	
111	Muhammad Shoab	Muhammad Amin	Chowkidar	NSR	GPS, Bara Banda	F.A	02/02/1985	29/09/2006	29/09/2006	30/09/2006	
112	Islam Jan	AbdUllah Jan	N/Q	NSR	GHSS, Z.K.Ksahib	S.S.C	01/05/1973	05/12/2006	05/12/2006	05/12/2006	346566258
113	Safi Ullah shah	Mubarak Shah	Chowkidar	NSR	GPS, Sherin Koty	S.S.C	03/02/1989	04/05/2007	04/05/2007	04/05/2007	
114	Wajid Ali	Sabz Ali	Chowkidar	NSR	GPS, Zando Banda	B.A / B.L.S	01/04/1986	23/05/2007	23/05/2007	23/05/2007	346262372
115	Shér Azam	Abdul Azam	W. Attend	Chitral	GHS, No.1 Nowshera Cantt:	S.S.C	30/03/1990	15/07/2008	15/07/2008	15/07/2008	346814470
116	Aftab Muhammad	Muslim Muhammad	Chowkidar	NSR	GPS Zakhi Qabristan	SSC	18/01/1984	30/09/2009	10/01/2009	10/01/2009	334923575
117	Kifayat Khan	Nasim Khan	Sweeper	NSR	GMS, Chashmai	SSC	01/12/1964	30/09/2009	01/10/2009	10/01/2009	334892158
118	Shehzad Khan	Niaz Parwar Khan	Chowkidar	NSR	GPS Khansher Ghari	FA	03/12/1983	10/03/2009	10/04/2009	10/04/2009	333925905
119	Nasrullah Khan	Zarien Khan	Sweeper	NSR	EDO(E & SE) Nowshera	SSC	04/05/1974	10/05/2009	10/05/2009	10/05/2009	
120	Naeem Gul	Harif Gul	Behishti	NSR	GMS, Narri	S.S.C	15/01/1979	10/05/2009	10/05/2009	10/05/2009	3329002431
121	Syed Jamal Shah	Syed Bukhari Shah	Behishti	NSR	GMS, Kana Khel	S.S.C	02/02/1979	05/10/2009	10/06/2009	10/06/2009	3469080014
122	Shoukat Hussain	Aman Ullah	Behishti	NSR	GHS, Inzari	S.S.C	31/12/1984	15/07/2009	15/07/2009	15/07/2009	3075708837
123	Saddam Hussain	Mumtaz Hussain	Chowkidar	NSR	GPS, 2 Khudrizi	FA, PTC	01/01/1990	15/07/2009	15/07/2009	15/07/2009	3005312090
124	Shahid Khan	Tasleem Khan	N/Q	NSR	GHSS, Khesghi Payan	S.S.C	04/03/1976	18/07/2009	18/07/2009	18/07/2009	
125	Muhammad Riaz	Muhammad Saeed	Sweeper	NSR	GMS, Narri	M.A	03/02/1970	21/07/2009	21/07/2009	21/07/2009	3128036135
126	Arshad Ali	Sherzada	Chowkidar	NSR	GPS, Bar a Bnda No:1	B.A	01/01/1979	21/07/2009	21/07/2009	21/07/2009	
127	Shaukat Ali	Shishti Gul	Chowkidar	NSR	GPS, 1 Akberpura	FA, DPED	04/10/1981	21/07/2009	25/07/2009	25/07/2009	3005933399
128	Muhammad-Ibrar-Khar	Hawalder-Khan	Mali	NSR	GHS, Taru Jabba	SSC	22/03/1967	25/07/2009	25/07/2009	25/07/2009	
129	Anwar Khan	Mir Rehman	Mali	NSR	GHSS, Akbar Pura	S.S.C	09/04/1971	25/07/2009	25/07/2009	25/07/2009	3025777413
130	Muhammad Junaid	Muhammad Shah	Behishti	NSR	GHS, Dak Ismail Khel	S.S.C	15/03/1984	28/07/2009	28/07/2009	28/07/2009	
131	Muhammad Tufail	Muhammad Nishat	Lab: Attend	NSR	GHS, Badrashi	S.S.C	04/04/1975	29/07/2009	29/07/2009	29/07/2009	3126369055
132	Shan Zeb	Safarash Khan	Chowkidar	NSR	GHS, Badrashi	S.S.C	03/04/1976	29/07/2009	29/07/2009	29/07/2009	3314268726


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			Lab:attended	NSR	GHS, Dheri Katti Khel	SSC	24/02/1984	30/07/2009	30/07/2009	30/07/2009	
133	Hamid Khan	Shakeel Ahmad	Lab: Attend	NSR	GHS, Manahai	S.S.C	10/04/1991	30/07/2009	30/07/2009	30/07/2009	33398690
134	Zakir Rehman	Shasur Rahman	N/Q	NSR	GMS, Kotar Pan	S.S.C	18/04/1986	10/08/2009	10/08/2009	10/08/2009	30059100
135	Abrar Ali	Bahar Ali	N/Q	NSR	GMS, Islamabad	B.A	28/05/1983	11/08/2009	11/08/2009	11/08/2009	92392300
136	Shahid Ali	Habibul Ghafoor	Mali	NSR	GHS, Pir Sabaq	S.S.C	07/06/1981	12/08/2009	12/08/2009	12/08/2009	30263260
137	Muhammad Shafee	Kifayat Ullah	Sweeper	NSR	GHS, Jarooba	S.S.C	03/08/1976	18/08/2009	18/08/2009	18/08/2009	
138	Hazrat Nooh	Khan Wada	Chowkidar	NSR	GPS, Gandary Payan	SSC	10/05/1972	19/08/2009	19/08/2009	19/08/2009	
139	Gul Said	Muhammad shah	Chowkidar	NSR	GPS, Banda Chill	SSC	24/11/1979	20/08/2009	20/08/2009	21/08/2009	
140	Irfan Ullah	Mir Bahadar	Chowkidar	NSR	GPS, Banda Chill	SSC	24/11/1976	22/08/2009	22/08/2009	22/08/2009	
141	Saif Ali Khn	Sher Baz Khan	Sweeper	NSR	GHS, No.1 Shaidu	SSC	05/06/1974	17/09/2009	17/09/2009	17/09/2009	30159460
142	Musa Khan	Nasrullah Khan	Chowkidar	NSR	GPS.2 Babi Jadeed	SSC	30/03/1979	19/09/2009	20/09/2009	20/09/2009	30383500
143	M. Rashid Azeem	Molvi M. Ibrahim	Chowkidar	NSR	Zakhi Charbagh	FA	06/02/1972	06/10/2009	06/10/2009	06/10/2009	
144	Muhammad Waheed	Muhammaad Saeed	Chowkidar	NSR	GPS, Eid Gah	S.S.C	06/08/1991	06/10/2009	06/10/2009	06/10/2009	
145	Shahzad	Murad Khan	Chowkidar	NSR	GHS, Bara Banda	SSC, PTC	13/01/1972	09/05/2009	09/12/2009	09/12/2009	30377400
146	Sajjad Ali	Haleem Gul	Chowkidar	NSR	GPS Zakhi Miana	S.S.C	04/07/1992	10/01/2010	10/01/2010	10/01/2010	32393200
147	Naveed Ullah	Ghufran Ullah	Lab: Attend	NSR	GHS, Gandary Payan	F.A, PTC	03/03/1981	14/01/2010	14/01/2010	14/01/2010	30090720
148	Abrar Ahmad Shah	Sayed Mohib Shah	Lab: Attend	NSR	GHSS, Risalpur	F.A, PTC	03/01/1977	23/01/2010	23/01/2010	23/01/2010	
149	Aayaz Muhammad	Pir Muhammad	Chowkidar	NSR	GPS, Bara Banda Nol	F.A	03/01/1977	23/01/2010	23/01/2010	03/03/2010	30053560
150	Hawal Shah	Alam Shah	Chowkidar	NSR	GGPS, Tootki	S.S.C	10/06/1975	03/03/2010	03/03/2010	03/03/2010	
151	Khan Muhammad	Janab Gul	N/Q	NSR	GHS, Jabbi	SSC	01/01/1965	04/03/2010	04/03/2010	04/03/2010	30687860
152	Muhammad Shoaib	Fazal Amin	Behishti	NSR	GHS, Jabbi	S.S.C	15/12/1970	04/03/2010	04/03/2010	04/03/2010	
153	Kashif Khan	Shahin Shah	Chowkidar	NSR	GPS Palosi Payan	FA	20/12/1991	28/05/2010	06/03/2010	06/03/2010	33489270
154	Niamat Ullah	Abdul Wakil	N/Q	NSR	GPS Pashtoon Garhi	S.S.C	04/12/1975	15/03/2010	15/03/2010	15/03/2010	
155	Munawar Din	Roshan Din	Chowkidar	NSR	GHSS, Nizampur	S.S.C	01/03/1963	16/03/2010	16/03/2010	16/03/2010	
156	Kalim ur Rehamn	Bad Shah Gul	L/Att	NSR	GHS, No.1 Shaidu	SSC	18/03/1974	16/03/2010	16/03/2010	16/03/2010	
157	Mir Baz Khan	Khan Bahadar	Chowkidar	NSR	GHS, Dagi Banda	SSC	10/03/1978	02/04/2010	02/04/2010	02/04/2010	
158	Aman Ullah	Hamid Ullah	Chowkidar	NSR	GPS Hamid Abad	SSC	20/04/1988	15/11/2010	15/11/2010	16/04/2010	30058750
159	Farzand Ali	Zafer Ali	Chowkidar	NSR	GPS Jallozai No2	SSC	22/02/1977	14/04/2010	17/04/2010	17/04/2010	
160	Mushtaq Ahmad	Noor Ahmad	C-IV		GMS, Shiwangi	S.S.C		20/04/2010	20/04/2010	20/04/2010	
161	Shahzad Khan	Haidar Ali	Chowkidar	NSR	GPS, Bara Banda Nol	SSC	01/05/1983	19/05/2010	19/05/2010	19/05/2010	
162	Taj Ali	Muhammad Ali Khan	Chowkidar	NSR	GPS, Gandary Bala	SSC	04/03/1979	24/05/2010	24/05/2010	24/05/2010	
163	Bilal Nasir	Sher Shah	Chowkidar	NSR	GPS, Aba Khel	F.A	23/12/1991	29/05/2010	29/05/2010	29/05/2010	
164	Asad Khattak	Dur Muhammad	W. Attend	NSR	GHSS, Nizampur	S.S.C	06/09/1988	01/06/2010	01/06/2010	01/06/2010	
165	Fasih ur Rahman	Raz Ali Shah	Chowkidar	NSR	GPS, Nihal Pura	S.S.C	15/11/1990	01/06/2010	01/06/2010	01/06/2010	

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							13/07/1991	04/06/2010	04/06/2010	04/06/2010	312984839
166	Kaleem Ullah	Siraj Muhammad	Sweeper	NSR	GCMHS, Akora Khattak	S.S.C	18/01/1980	22/06/2010	24/06/2010	24/06/2010	344451153
167	Zubair	Shah Muhammad	Chowkidar	NSR	GPS, Suhbat Korrana	SSC	15/02/1990	24/06/2010	24/06/2010	24/06/2010	346957137
168	Imran ud Din	Fayaz ud Din	Sweeper	NSR	GHSS, Z.K.Ksahib	F.A	05/03/1979	25/06/2010	25/06/2010	25/06/2010	
169	Sabzar Khan	Sardar Muhammad	Chowkidar	NSR	GPS, Ouch Khwar	S.S.C	12/02/1981	25/06/2010	25/06/2010	25/06/2010	
170	Ifrikhar Khan	Jabbar Khan	Chowkidar	NSR	GPS, Issori Payan	B.A	05/05/1974	29/06/2010	29/06/2010	29/06/2010	301876857
171	Shabir Ahmad	Abdul Nawaz	Chowkidar	NSR	GPS, Hassan Dara	S.S.C	28/01/1993	30/09/2009	30/09/2009	10/07/2010	
172	Syed Tayyeb Ali shah	Syed Haleem Shah	Chowkidar	NSR	GPS, Spino Killi	B.A	28/01/1993	26/02/2010	26/02/2010	03/08/2010	346567024
173	Raza Khan	Said Nazeeer	Chowkidar		GHS, No2 Shaidu	F.Sc	05/07/1986	01/01/2011	01/01/2011	01/01/2011	307807483
174	Sufaid Khan	Muhammad Zaman	Lab: Attend		GHS, Tarkha	B.A	03/08/1985	01/01/2011	28/02/2011	28/02/2011	343954865
175	Arshad Aman	Bhai Khan	Sweeper	NSR	GHS, Watter	S.S.C	10/01/1985	28/02/2011	28/02/2011	10/01/2012	
176	Hidayat Shah	Bahader Shah	Chowkidar	NSR	GPS Dag Behsud No5	SSC	20/08/1988	10/01/2012	10/01/2012	10/01/2012	333904986
177	Nasir Khan	Noor Muhammad	Chowkidar	NSR	GPS.3 Ali Baig	SSC	01/12/1985	17/01/2012	18/01/2012	18/01/2012	313923633
178	Arshid Khan	Kamal Khan	Chowkidar	NSR	GPS Lakari	SSC	08/01/1978	19/01/2012	19/01/2012	19/01/2012	
179	Zubair Khan		Lab: Attend		GHS, Khaisari	S.S.C		19/01/2012	19/01/2012	19/01/2012	
180	Rooh-Ullah	Mir Zaman		NSR	GMS, Kandi Taza Din	S.S.C	01/09/1979	26/01/2012	26/01/2012	26/01/2012	333919289
181	Khailid Dawood	Dawood Khan	Lab: Attend		GHS, No2 Shaidu	S.S.C	19/08/1988	30/01/2012	30/01/2012	30/01/2012	313935639
182	Khaer ul Bashar	Dilawar Khan	Sweeper	NSR	GMS, Aman Garh	F.Sc	19/09/1990	31/01/2012	31/01/2012	31/01/2012	332934342
183	Mustafa	Asalm Khan	Behishti	NSR	GHS, No.1 Shaidu	D.A.E	19/09/1990	08/02/2012	08/02/2012	08/02/2012	
184	Khan Niaz	Haroon Khan	Chowkidar	NSR	GHS, Khesghi Bala	SSC	23/04/1972	09/02/2012	09/02/2012	09/02/2012	92364012
185	Ijaz Ahmad	Nazir Muhammad	Chowkidar	NSR	GPS Kabul River	S.S.C	05/10/1976	02/01/2012	18/02/2012	18/02/2012	
186	Mubarak Ali	Allah Bakhsh	Sweeper	NSR	GHS, No.1 Nowshera Cantt:	FA	01/12/1978	02/01/2012	18/02/2012	18/02/2012	321952646
187	Mukarram Khan	Muh. Akram Khan	N/Q		GHS, No.1 Nowshera Cantt:	S.S.C	09/02/1967	01/03/2012	01/03/2012	01/03/2012	300571053
188	Ahmad Ali	Muhammad Tahir	Behishti	NSR	GHS, No.1 NSR Kalan	B.A	20/09/1973	02/07/2012	02/07/2012	02/07/2012	301562500
						S.S.C	15/04/1988	07/08/2012	07/08/2012	07/08/2012	


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