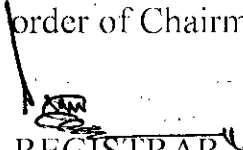


FORM OF ORDER SHEET

Court of _____

Case No. - _____ 1802 /2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/12/2022	<p>This appeal is presented today by Mr. Sajjad Ahmad Mehsud Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

Service Appeal No. 1802/2022

Khalij Ur Rehman APPELLANT

VERSUS

The Govt. of KP & others..... RESPONDENTS

I N D E X

S.N O.	DESCRIPTION OF DOCUMENTS	ANNEX	PAGES
1.	Service Appeal		1-4
2.	Condonation of Delay		5
3.	Affidavit		6
4.	Addresses of the Parties		7
5.	National Identity Card	"A"	8
6.	Advertisement	"B"	9
7.	Copy of Appointment letter/Order dated:21.07.2017	"C"	10-12
8.	Copy of Other Batch Mate Orders Dated: 22.04.2013,	"D"	13-21
9.	Copy of Other Batch Mate Orders Dated: 24.05.2013	"E"	22-23
10.	Copy of Other Batch Mate Orders Dated: 30.04.2013	"F"	24-26
11.	Departmental Appeal	"G"	27
12.	Copy of Memo of Writ Petition No. 91-B/2019	"H"	28
13.	Copy of Judgment dated: 16.11.2022	"I"	29-30
14.	Wakalatnama		31

Through

APPELLANT


Sajjad Ahmad Mehsud
Advocate

Suite No.SF-39-40, Liberty
Mal Tambawano Mor,
University Road, Peshawar.
sajjadmehsuadv@gmail.co
m. 0333-9981464

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. _____-P/2022

Khalij Ur Rehman S/O Nasr Ullah Jan, Resident of Handi Khel,
Jani Khel, Presently posted as a Theology Teacher (TT BPS-15),
at GPS- Kala Khan, District Bannu.....APPELLANT

...VERSUS...

1. **The** Government of Khyber Pakhtunkhwa, through its Chief Secretary, Civil Secretariat, Peshawar.
2. **The** Secretary Elementary and Secondary Education Department Khyber Pakhtunkhwa, Peshawar
3. **The** Director Elementary and Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
4. **The** District Education Officer, (DEO), Near Bannu Town Ship, Bezankhel Road, Bannu.
5. **The** Additional Education Officer, District Bannu.
6. **The** District Account officer District Bannu.....RESPONDENTS

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, ACT 1974 (KP ACT NO.1 OF 1974), R/W ALL ENABLING PROVISIONS OF LAW, GOVERNING THE SUBJECT, AGAINST THE IMPUGNED ACTION OF RESPONDENTS BY IGNORING THE DATE OF APPOINTMENT OF APPELLANT AT PAR WITH HIS OTHER COLLEAGUES WHICH WERE APPOINTED THROUGH ONE AND THE SAME ADVERTISEMENT DATED: 23.10.2012.

RESPECTFULLY SHEWETH:

1. **That** the appellant is law abiding peaceful citizen of Pakistan, domicile of supra address mentioned in the heading of appeal. (COPY OF NIC ALONG-WITH SERVICE CARD IS ATTACHED AS ANNEXURE "A").
2. **That** Respondent No.4, the then Agency Education Officer (FATA) issued numerous jobs advertisement on **23.10.2012** through Daily **MASHRIQ**, wherein, applications were invited from the eligible and suitable candidates of FR Bannu & FR Lakki, moreover, the office of Additional Education Officer was the same for both the FR's. (COPY OF ADVERTISEMENT DATED: **23.10.2012** IS ATTACHED AS ANNEXURE "B").
3. **That** the appellant was qualified and applied for the post of Theology Teacher "TT", successfully gone through the entire process of selection, the proper merit list of selectee was prepared by the respondents, moreover, his batch mates who belongs to FR Lakki now defunct, Bajaur and Orakzai were appointed through office orders dated: 22.04.2013, 24.05.2013 & 30.04.2013 endst No.1366-85 & 4365-70 , but the appointment of appellant was delayed by the respondents for illegal gain, however, he was appointed through office order dated: 21.09.2017 with almost delay of five years. (COPIES OF APPOINTMENT LETTER DATED: 21.09.2017 OF APPELLANT AND HIS OTHER BATCH MATE ORDERS DATED: 22.04.2013, 24.05.2013 & 30.04.2013 ARE ATTACHED AS ANNEXURE "C" "D" "E" & "F" RESPECTIVELY).
4. **That** appellant approached through proper channel to respondent No.4 Vide representation/departmental appeal dated: against the discriminatory treatment of respondent by not considering the appellant seniority at par with his other batch mates appointed through one and the same advertisement dated: 23.10.2012 the representation ibid is still pending before the competent authority. (COPY OF DEPARTMENTAL APPEAL DATED: 18-9-18 IS ATTACHED AS ANNEXURE "G").
5. **That** appellant approached through Writ Petition No. 91-B/2019, which was decided on 16.11.2022 by the august Peshawar High Court Bannu Bench, Bannu. (COPIES OF WRIT PETITION NO.91-B/2019 & JUDGMENT DATED: 16.11.2022 IS ATTACHED AS ANNEXURE "H" & "I" RESPECTIVELY).

6. That the appellant is having no other efficacious and alternative remedy, hence approaches this Hon'ble Tribunal inter alia on the following grounds

GROUND

- A. That it is the constitutional vested rights of the appellant to be dealt in accordance with law.
- B. That the act of the respondents by ignoring the date of seniority of the appellant at par with his batch mates is illegal, unlawful, void-ab-initio and is disregard of law.
- C. That the appellant has been treated discriminatorily and his batch mates are senior to the appellant. However, advertisement, test, interviews & lists were originated by respondents on the same date.
- D. That the impugned orders have been issued in surmises and conjectures rather based on misreading and non-reading of the facts of the case hence, deserves to be set at naught. Furthermore, the respondents have no lawful authority to ignore the appellant without any justified reasons.
- E. That the respondent No.4 was initially issued the advertisement dated: **23.10.2012** through Daily **MASHRIQ** wherein, the application was invited from the eligible candidates of erstwhile FR Bannu, FR Lakki Marwat & Other districts, Meanwhile, the list of successful candidates was issued by the respondent No.4 of all both the districts, astonishingly the appointment of all the candidates belonging to erstwhile FR Lakki, Orakzai & Bajaur was made on.22.04.2013, 30.04.2013 & 24.05.2013, while the appointment of appellant was ignored/stopped without any cogent and plausible reason, meanwhile the appellant was appointed with the delay of almost five years, hence, the action of respondents is discriminatory in nature in the eye of law.
- F. That the appellant was deprived of his appointment as a teacher with his batch-mates, who were appointed through supra orders, as such the appointment of the appellant was delayed without plausible reasons, furthermore, the appellant is entitled to be allowed seniority with his colleagues in light of section 8 of the Khyber Pakhtunkhwa Civil Servants Act. 1973, however, the appellant having been appointed in a same


selection process as such his seniority is to be determined in accordance with the order of merit, assigned by the selection committee.

G. That any other ground will be raised at the time of arguments with the prior permission of this Hon'ble Tribunal.

It is therefore, most humbly prayed, that on the acceptance of instant appeal, the respondents may please be directed to reckon the seniority of appellant from the date of his other first batch colleagues appointed through one and the same advertisement dated: 23.10.2012 with all back benefits. So as to secure the ends of justice and equity

Any other relief not specifically prayed for and deemed appropriate to this Hon'ble Tribunal, may also be granted in favour of appellant.

Through

Appellant 

Sajjad Ahmad Mehsud 

&


M Kareem Afridi

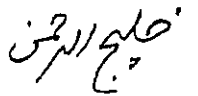
Advocates

Suite No.SF-39-40, Liberty Mal
Tambowano Mor, University
Road, Peshawar. 0333-9981464

CERTIFICATE:

Prior to the instant service appeal, appellant approached to the august Peshawar High Court, Bannu Bench at Bannu through Writ Petition No. 91-B/2019, this was decided on 16.11.2022.

DEPONENT



BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. ___/2022

Khalij Ur Rehman.....APPELLANT
...VERSUS...

The Govt of KP & others.....RESPONDENTS

APPLICATION FOR CONDONATION OF DELAY

Respectfully Sheweth:

1. That the supra appeal has been filed by the petitioner/appellant and no date of hearing has yet been fixed.
2. That, earlier to the instant appeal applicant approached through Writ Petition No: 91-B/2019, this was decided on 16.11.2022. to the august Peshawar High Court, Bannu Bench at Bench, against the impugned discriminatory inaction of respondents.
3. That numerous verdict passed by the Apex Court of Pakistan, wherein it has been held the cases shall be decided on merits rather on the basis of technicalities.
4. That delay in filing the titled appeal if any is neither willful nor deliberate but due to reason mentioned above.

It is, therefore, most humbly prayed that on acceptance of this application, the delay, if any, in filing the above titled appeal may kindly be condoned in the interest of justice.

Applicant/appellant

خلج اور رحمان

Through

Sajjad Ahmad Mehsud

&

M Kareem Afridi

Advocates

Suite No.SF-39-40, Liberty Mal
Tambawano Mor, University
Road, Peshawar. 0333-9981464

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. ___/2022

Khalij Ur Rehman.....APPELLANT

...VERSUS...

The Govt of KP & others.....RESPONDENTS

AFFIDAVIT

I, Khalij Ur Rehman S/O Nasr Ullah Jan, Resident of Handi
Khel, Jani Khel, Presently posted as a Theology Teacher
(TT BPS-15), at GPS- Kala Khan, District Bannu, APPELLANT,
do hereby solemnly affirm and declare on oath that the
contents of the accompanying **Service Appeal** and
application are true and correct to the best of my
knowledge and belief and nothing has been concealed
from this Hon'ble Tribunal.

DEPONENT

خلیج الرحمن

NIC No. 22201-2850109-9

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. ____/2022

Khalij Ur Rehman.....APPELLANT
...VERSUS...

The Govt of KP & others.....RESPONDENTS

ADDRESSES OF THE PARTIES

APPELLANT:

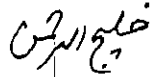


Khalij Ur Rehman S/O Nasr Ullah Jan, Resident of Handi Khel, Jani Khail, Presently posted as a Theology Teacher (TT BPS-15), at GPS- Kala Khan, District Bannu.

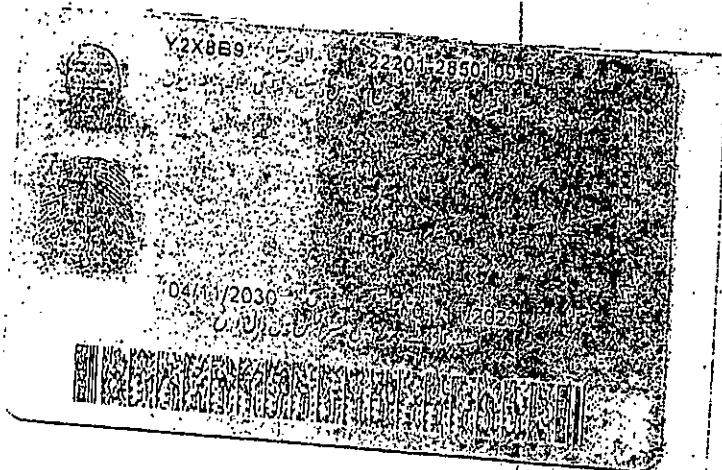
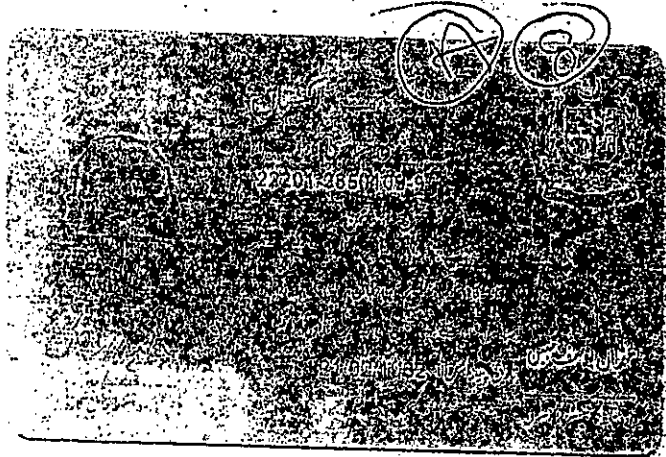
RESPONDENTS:

1. The Government of Khyber Pakhtunkhwa, through its Chief Secretary, Civil Secretariat, Peshawar.
2. The Secretary Elementary and Secondary Education Department Khyber Pakhtunkhwa, Peshawar.
3. The Director Elementary and Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
4. The District Education Officer, (DEO), Near Bannu Town Ship, Bezankhel Road, Bannu.
5. The Additional Education Officer, District Bannu.
6. The District Account officer District Bannu.

Through

Appellant

خلیفہ رحمان


Sajjad Ahmad Mehsud
& 
M Kareem Afridi
Advocates
Suite No.SF-39-40, Liberty Mal
Tambawano Mor, University
Road, Peshawar. 0333-9981464





Office of the

AGENCY EDUCATION OFFICER, FR BANNU

Near Bannu Township Bezen Khel road, Bannu
Ph: 0928-633255, Fax: 0928-633255

2
10

APPOINTMENT ORDER:

Consequent upon the interviews conducted by departmental selection committee during 2012 and the direction education FATA Peshawar directed the undersigned for solving the issue of AT/TT out of 2012 interviews vide his letter No:14132 dated pesh:the:08/06/2017 & and letter no:11199 dated pesh:the: 22/06/2017 the following male candidate of TT on open/tehsil merit basis is/are hereby appointed against the vacant TT post(s) in the school mentioned against his/her/their name(s) in BPS-15 (16120-1330-56020)-PM plus usual allowances admissible under the rules in the interest of public services with immediate effect.

Note: Beside other term and condition given in this appointment order this/these appointment will remain open for any kind of appeal against the appointee and the appointee will submit an affidavit to the effect that if an institution/ madrasah from where he/she /they have been educated and recovered his/her/their degree/certificate/s and were found bogus OR declare substandard; by any authorized committee, court OR authority. He/she/they will face cancellation of his/her/their appointment happily and will deposit what has received a salaries, in GOVT. treasury

S#	Name of candidate	Familys name	Merit position	Place of posting	remarks	Vacancy verified by
1	Khajil-ur-Rehman	Huqar/ah jan	Tehsil merit	GPS Toor Hindi Khel.	Against vacant TT post	Daftar khan AAEO

TERMS AND CONDITIONS:

1. This/these appointments have been made purely according to the government policy/ rules according 2012 and are subjected to the term and condition laid by the government time to time, moreover this/these appointment can be withdrawn and is liable to termination without any notice, if any legal, clerical or other kind of mistake arise, their.
2. If/he/she/they wishes to resign from their services he/she/they will give one month prior notice OR one month's full pay will be forfeited in the lieu thereof.
3. he/she/they will produce their death and age certificate from medical superintendent D.H.Q hospital/agency surgeon concerned.
4. He/she/they will not be handed over charge if his /her/their age is below OR the prescribed age limit for new appointees.
5. If he/she/they fails to receive charge within 15 days after issuing order his/her/their appointments order/orders will be consider as cancelled.
6. He/she/their domicile /documents/certificates will also be verified from the quarter's concerned and if found bogus his/her/their appointments will stand as cancelled.
7. The candidate will submit an affidavit to the effect that he/she/they do not possess any kind of services in any GOVT./semi GOVT :departmental/district panchayat/tehsildar/panchayat/councilor OR any elected representation.
8. His/her/their pay will not be drawn till the verification of his/her/their all documents.
9. If Any technical/legal thing is pointed out, appointment of the concerned appointee/ appointee will stand as cancelled.
10. charge report should be submitted as duplicated to all concerned.

(ABDUL QADIR KHAN)
Agency Education Officer
FR Bannu at Bannu

Endst. No. 118-25

Dated: 21/08/2017

Copies forwarded for information to the:

1. Director Education (FATA) KPK, Peshawar w/r to his Nos, cited above please.
2. Deputy Commissioner Bannu.
3. Assistant Political Agent FR Bannu.
4. District Accountant Bannu.
5. AAEO area concerned FR Bannu.
6. Head of Institution concerned.
7. Accountant local office./office record
8. Candidates(s) concerned.

Agency Education Officer
FR Bannu at Bannu

OFFICE OF THE AGENCY EDUCATION OFFICER FR BANNU AT BANNU

Final Merit List of TT (Male) Local candidates of Uthmanzai area on the basis of Revised Interview List (75 % basis)
Interview held on dated: 24/12/2012

Note: This Merit list reviewed in the light of Director Education (FATA) Letter No. 11199, Dated: 22/06/2017 according to the previous CT/PST appointment orders i.e on the basis of Two Tehsils out of 2012 Interviews.

Sl	Interview Sl#	Name	Father's name	Domicile	Domicile tribe	D.O birth	SSC Score (20)			HSSC Score (20)			BA/BSc Score (20)			M.A/BSc/BA with Arabic & Isl Study Cert Score (15)			M.A/BSc/BA Edu Score (20)			M.Phil/PhD Marks (5)	Total Score	Remarks
							Matr. Dir.	Tot. Marks	Score	Matr. Dir.	Tot. Marks	Score	Matr. Dir.	Tot. Marks	Score	Matr. Dir.	Tot. Marks	Score	Matr. Dir.	Tot. Marks	Score			
1	7	Shoib Rehman	Muhammad Sher	FR Bannu	Uthmanzai	27/01/1985	425	850	10.00	412	600	13.73	214	400	10.70	393	600	9.83	430	600	14.33	5	63.59	Already APT
2	133	Rizwanullah	Abdur Rahman Khan	FR Bannu	Uthmanzai	21/01/1984	725	1050	13.81	407	600	13.57				420	600	10.50	386	600	12.87		50.75	
3	16	Izzatullah	Mushk Alam	FR Bannu	Uthmanzai	22/05/1986	599	1050	13.30	405	600	13.53				379	600	9.48	424	600	14.13		50.44	
4	99	Abesdullah Khan	Sa'ullah Khan	FR Bannu	Uthmanzai	13/06/1985	409	850	9.62	573	1100	10.42	312	550	11.35	290	600	7.25	558	1100	10.15		48.79	Appointment is subject to provision of Khasa Original Sanad
5	56	Akbar Nawaz	Gul Muhammad Khan	FR Bannu	Uthmanzai	22/03/1985	633	1050	12.06	448	600	14.93				395	600	9.88	274	600	9.13		46.00	
6	101	Asghar Khan	Muhammad Khan	FR Bannu	Uthmanzai	22/01/1983	697	1050	13.28	376	600	12.53				363	600	9.08	320	600	10.67		45.56	
7	38	Muneer Ahmad	Hussain Ahmad	FR Bannu	Uthmanzai	27/12/1985	466	900	10.80	385	600	10.17				445	600	11.13	401	600	13.37		45.47	
8	1	Amanullah	Abdur Rashid	FR Bannu	Uthmanzai	12/08/1984	535	850	12.59	345	600	11.50	339	700	11.11	400	600	10.00					45.20	
9	13	Aliaullah Shah	Zarban Shah	FR Bannu	Uthmanzai	27/02/1982	369	850	8.68	418	600	13.93				350	600	8.75	268	600	12.27		43.63	
10	68	Muhammad Sherin	Sher Bahadar Khan	FR Bannu	Uthmanzai	27/02/1984	387	850	9.11	434	600	14.47				334	600	8.35	351	600	11.70		43.63	
11	64	Wehidullah	Membar Ali Khan	FR Bannu	Uthmanzai	28/10/1985	524	900	11.64	306	600	10.20				446	600	11.15					40.70	
12	136	Rehmatullah Khan	Dallar Khan	FR Bannu	Uthmanzai	25/03/1989	647	900	14.38	455	600	15.17				446	600	11.15					40.29	
13	53	Khafiq-ur-Rehman	Nasrullah Khan	FR Bannu	Uthmanzai	24/02/1982	604	1050	11.50	295	600	9.83				333	600	8.33	319	600	10.63		40.29	
14	65	Saeedullah	Azizullah Khan	FR Bannu	Uthmanzai	03/02/1987	659	1050	12.55	302	600	10.07				291	600	7.28	309	600	10.30		40.20	
15	17	Hoorullah	Sahib Khan	FR Bannu	Uthmanzai	15/04/1975	205	375	10.93	303	600	10.10				352	600	8.80	279	600	9.30		39.13	
16	112	Abdur Rahman	Zafar Khan	FR Bannu	Uthmanzai	01/01/1978	456	850	10.73	300	600	10.00				257	600	6.43	351	600	11.70		38.86	

12

12

Sl. No.	Interv. Sl.	Name	Father's name	Domicile	Domicile tribe	D.O Birth	SSC Score (20)			HSSC Score (20)			SA/SSC Score (20)			MA/SSC/Ed/MA Edu Score (20)			As Phil. Ptd. Marks (%)	Total Score	Remarks			
							Mat. Que.	Int. Marks	Score	Mat. Que.	Int. Marks	Score	Mat. Que.	Int. Marks	Score	Mat. Que.	Int. Marks	Score						
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
17	36	Muhammad Hanif Khan	Inayatullah Khan	FR Bannu	Uthmanzai	04/02/1983	595	1050	11.33	341	600	11.37				278	600	6.95	259	600	6.63		38.20	
18	4	Shariatullah	Ghaffar Khan	FR Bannu	Uthmanzai	13/04/1955	371	950	8.73	510	900	11.33	559	1000	11.78	251	600	6.28					38.12	
19	93	Abdullah	Khan Zaman	FR Bannu	Uthmanzai	07/12/1957	480	850	11.29							459	600	11.48	456	600	15.20		37.97	
20	12	Bughdad Khan	Sajid Khan	FR Bannu	Uthmanzai	11/04/1982	155	375	8.27	319	600	10.63				303	600	7.58	289	600	9.63		35.11	

A.A.E.O (Estab:) Concerned
AEO office FR Bannu
(Member/Secretary)

Principal,
GHSS Nadir Bodin Khel FR Bannu
(Member)

Representative
Directorate of Edu: (FATA), Peshawar
(Member)

Agency Education Officer
FR Bannu (Member)


DCO/Political Agent
FR Bannu (Chairman)


A.A.E.O (Estab:/U-Zai) Concerned
AEO office FR Bannu
(Member/Secretary)

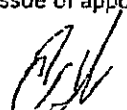
Principal,
GHS Bakka Khel FR Bannu
(Member)

Recommendations of the Committee:

The above candidates are finalized on merit basis according to the given directions as in the above stated letter of Director Education (FATA) Peshawar out of Uthmanzai area and recommended for appointments in order to solve the issue of appointments of AT & TT in FR Bannu out of 2012 Interviews.


(MUHAMMAD IQBAL)
Principal, GECT Kotka Hbaibullah
(Member)


(ANWAR ULLAH)
Principal, GHS Bakka Khel
(Member)


(INCOR ZALI KHAN)
Assistant Director (M&E) Peshawar
(Member)

(KHURSHID ALI)
Principal, GHS Sardi Khel
(Member)

(ABDUL QADIR KHAN)
Agency Education Officer, FR Bannu
(Chairman)



(13)

OFFICE OF THE AGENCY EDUCATION OFFICER F.R. LAKKI

LIST OF INTERVIEWED CANDIDATE APPOINTED IN FR LAKKI ON PURE OPEN MERIT BASIS IN DATED.22/04/2013.

S.No.	Name of Candidate	Post	Gender	Place of posting/Name of school
1.	Naqibullah ✓	CT	Male	GMS Sra Ghundi FR Lakki.
2.	Mir Ajab Khan ✓	CT	-do-	GHS, Wargra WSakhi Mar Jan.
3.	Inamullah ✓	CT	-do-	GMS, Sra Ghundi.
4.	Sawab Gul ✓	CT	-do-	GMS, Abdur Rehman.
5.	Imranullah	CT	-do-	-do-
6.	Shagufta Rehman ✓	CT	Female	GGMS, Gul Anar Guli Khel.
7.	Khalida Bibi ✓	CT	-do-	-do-
8.	Hosna Bibi ✓	CT	-do-	GGMS, Gul Muhammad.
9.	Safder Hayat ✓	DM	Male	GMS, Wateen Bhattani.
10.	Rafiullah ✓	DM	-do-	GMS, Shahi Gul.
11.	Nosheen Kokab ✓	-do-	Female	GGMS, Gul Anar Guli Khel.
12.	Sher Azam ✓	PET	Male	GMS, Abdur Rehman.
13.	Naqibullah	PET	-do-	GHS, Sargrah Muhammad Khan.
14.	Zahoor Ahmed ✓	PET	-do-	GMS, Sra Ghundi Saskhi Mar Jan.
15.	Farzana ✓	PET	Female	GGMS, Gul Anar.
16.	Bas Nawab Nurgas	PET	-do-	GGMS, Gul Muhammad.
17.	Ahmad Munir	AT	Male	GMS, Faqir Zada Ghazi Mar Jan.
18.	Muhammad Shumoon	AT	-do-	GMS, Shahi Gul.
19.	Muhammad Ishaq. (k)	AT	-do-	GMS, Sra Ghundi.
20.	Muhammad Usman (1)	AT	-do-	GMS, Abdur Rehman.
21.	Tajmina Bibi ✓	AT	Female	GGMS, Gul Anar.
22.	Khurshida Bibi ✓	AT	-do-	GGMS Gul Muhammad.
23.	Moinud Din. ✓	TT	Male	GPS, Sarwar Rasul Khel.
24.	Abdul Wahid ✓	TT	-do-	GPS, Mirak Bhattani.
25.	Islam Badshah ✓	TT	-do-	GPS, Shahiman




OFFICE OF THE AGENCY EDUCATION OFFICER F.R. LAKKI.

26.	Rehmatullah	TT	Male	GHS, Sakhi Marjan Warga
27.	Samiullah	TT	-do-	GPS, Awaz Khan-Kara Khel
28.	Sharifullah	Qari	Male	GHS, Sakhi Marjan. Warga
29.	Zarcena	Qaria	Female	GGHS, Mir Kabal
30.	Qamarun Nissa	TT	-do-	GGPS, Sargrah Muhammad Khan.

Copy to the:-

1. Director Education (FATA) Peshawar for information please.
2. Deputy Commissioner Lakki Marwat. (P.A) F.R. Lakki -do-
3. Asstt: Political Agent F.R. Lakki.


Agency Education Officer,
Frontier Region Lakki.

(1/2/21)



15

APPOINTMENT ORDER

Consequent upon the Selection, by Departmental committee, for recruitment The following local candidates of F.R. Lakki are hereby appointed against the newly created vacant posts, Schools/ Post/ BPS, noted against their names according to the new recruitment policy of the Government, in the interest of public service with effect from his/ her/ their taking over charge in the schools.

Notwithstanding other terms and conditions given in this appointment order, this appointment will remain open for any kind of appeal, objection, queries, and the appointee will submit an affidavit to the effect, that if Institution/ Madrasa from where he/ she/ they have been educated and received their Degrees/ Certificate/ Awards were found bogus OR declared as sub standard, by any authorized committee, Court OR authority, he/ she/ they will face cancellation of his/ her/ their appointment at his/ her/ their own risk and will deposit which has received as Salaries, into Government Treasury.

S.No.	Name of Candidate with Score	Father's Name	Designation/Place of posting	Remarks
2	Saqibullah (59.87)	Marjan	PIET Post (BPS,09) CHS, Sargrah M. Khan FR Lakki.	Vacant PIET Post
3	Zahoor Ahmad (58.46)	Muhammad Nwor.	PIET Post (BPS,09) GMS, Tra Ghumaji Ghani Khel (Sakhi Marjan)	Newly Created PIET Post

TERMS & CONDITIONS

- The appointment is made purely according to the existing Government recruitment policy rules and is subjected to the terms and conditions framed by the Government time to time. Moreover, appointment can be withdrawn and is liable to termination without any notice, if any legal clerical or other kind of mistake arise there in.
- If he/she/they wishes to resign from service, he/she/they will give one month's prior notice OR one month's full pay will be forfeited in lieu thereof.
- He/she/they should produce their Health and Age certificate from Medical superintendent DHC Hospital Lakki Marwat.
- He/she/they will not be handed over charge if Age is below 18 OR above prescribed age limit for new appointees.
- If they resume the charge within 15 days his/her their appointment will be considered as vacant.
- If his/her/their Domestic/ Academic/ Professional (documents/ Certificate) will be verified from the quarter concerned if found bogus, his/her/their appointment will be cancelled & strict action will be taken against the defaulter.
- If any technical/legal flaw noticed out, Appointment of the concerned will be mutual consent.
- Charge reports should be submitted to all concerned.

(HAJI GHAZI KHAN)
AGENCY EDUCATION OFFICER,
FRONTIER REGION LAKKI

Endst/No. 1710-15 / Dated the 22/05 /2013.

- Copy for information to the:-
- Director of Education F.A. Peshawar.
 - Deputy Commissioner/ P.A. APA FR Lakki.
 - District Account's Officer Jammu/Lakki.
 - Principal/ I/M/H. T(M/F) Concerned Schools
 - A.AEO/Candidate Concerned.

[Signature]
Agency Education Officer,
Frontier Region Lakki.

OFFICE OF THE AGENCY EDUCATION OFFICER F.R. LAKKI.

APPOINTMENT ORDER

16

Consequent upon the Selection, by Departmental committee, for recruitment of the following local candidates of F.R. Lakki are hereby appointed against the newly created vacant posts, Schools' post/ BPS, noted against their names according to the new recruitment policy of the Government, in the interest of public service with effect from his/her taking over charge in the schools.

Note: Beside other terms and conditions given in this appointment order, this appointment will remain open for one month of appointment, and the appointee will submit an affidavit to the effect, that if Justification/ Address from where he/she they have been educated and received their Degrees/Certificates/ Awards were found bogus OR declared as sub standard, by any authorized committee, Court OR authority, the appointee will face cancellation of his/her appointment happily and will deposit which has received as Salary, into Government Treasury.

S. No.	Name of Candidate with Score.	Father's Name	Designation/Place of posting	Remarks
1.	Najibullah (79.34)	Fazullah.	CT Post BPS, 09 GMS, Sr. Ghundi Ghani Khas FR Lakki.	Newly Created CT Post
2	Mir Ajab Khan (28.19)	Abdullah Khan.	CT Post BPS, 09 GMS, Wargha Sakhi Mir Jan FR Lakki.	Do
		Abdul Aziz.	CT Post BPS, 09 GMS Sr. Ghundi Ghani Khas FR Lakki	Do

TERMS & CONDITIONS:

- The appointment is made purely according to the existing Government recruitment policy, rules, and is subjected to the terms and conditions framed by the Government time to time. Moreover the appointment can be with drawn and is/are liable to termination without any notice if any legal clerical or other kind of mistake arise there in.
- If the appointee wishes to resign from service, he/she they will give one month's prior notice and his/her full pay will be forfeited in lieu thereof.
- He/she they should produce their Health and Age certificate from Medical superintendent DHO Hospital Lakki Marwat.
- He/she they will not be handed over charge if Age is below 18 OR above prescribed age limit for new appointees.
- If they receive the charge within 15 days his/her/their appointment will be considered as cancelled.
- His/her/their Domestic/Academic/Professional (documents/certificate) will be verified from the quarter concerned if found bogus, his/her/their appointment will be cancelled & strict action will be taken against the defaulters.
- If any technical/legal flaw pointed out, Appointment of the concerned will be stand cancelled.
- Charge reports should be submitted to all concerned.

(HAJI GLAZI KHAN)
AGENCY EDUCATION OFFICER,
FRONTIER REGION LAKKI.

Number: 1738-43 / Dated the 22/04/2013.

- Copy for information to the:-
- Director of Education FATA, Peshawar.
 - Deputy commissioner/ PA/ APA FR Lakki.
 - District Account's Officer Bannu/Lakki.
 - Principal/ M/T (M/F) Concerned Schools
 - Candidate Concerned.

[Signature]
Agency Education Officer

(17)

APPOINTMENT ORDER

Consequent upon the Selection, by Departmental committee, for recruitment The following local candidates of F.R. Lakki are hereby appointed against the newly created vacant posts, Schools/pos/BPS, noted against their names according to the new recruitment policy of the Government, in the interest of public service with effect from his/ her/ their taking over charge in the schools.

Note: In addition other terms and conditions given in this appointment order, this appointment will remain open for any kind of appeal, and the appointee will submit an affidavit to the effect, that if Institution/ Madrasa from where he/she/ they have been educated, has been declared as un-recognized by any authorized committee, Court OR authority, it will lead to cancellation of his/ her/ their appointment. apply and will deposit which has received as Salaries, into Government Treasury

S.No.	Name of Candidate with Score.	Father's Name	Designation/Place of posting	Remarks
1.	Saidur Hayat. (54.51)	Muhammad Yousaf Khan.	DM Post (B/S,09) GMS, Wateen Bhitani FR Lakki.	Agency Post DM Post
2.	Rafiqullah Khan. (53.89)	Muhammad Rafiq Khan.	DM Post (B/S,09)GMS, Shahi Gul Bhitani FR Lakki.	

TERMS & CONDITIONS:

- The appointment is made purely according to the existing Government recruitment policy rules and is subjected to the terms and conditions framed by the Government time to time. Moreover the appointment can be with drawn and liable to termination without any notice, if any legal clerical or other kind of mistake arise there in.
- If he/she/they wishes to resign from service, he/she/they will give one month's prior notice & one month's full pay will be forfeited in lieu thereof.
- He/she/they should produce their Health and Age certificate from Medical superintendent, DHQ Hospital Lakki Marwat.
- He/she/they will not be handed over charge if Age is below 18 OR above prescribed age limit for new appointees.
- If they resume the charge within 15 days his/her/their appointment will be considered as cancelled.
- His/her/their Domestic/Academic/ Professional (documents/Certificate) will be verified for the quarter concerned if found bogus, his/her/their appointment will be cancelled & strict action will be taken against the defaulters.
- If any technical/legal flaw pointed out, Appointment of the concerned will be stand cancelled.
- Charge reports should be submitted to all concerned.

(MAJ) GLAZI KHAN
AGENCY EDUCATION OFFICER,
FRONTIER REGION LAKKI.

Endst:No. 1716-20 Dated the 22/09 2013.

- Copy for information to the:-
- Director of Education F.A.T., Peshawar.
 - Deputy Commissioner/ P.A./ P.A FR Lakki.
 - District Account's Officer Bannu/Lakki.
 - Principal/M.A.I.T(M/F) Concerned Schools
 - AAEO/Candidate Concerned.

gjm
Agency Education Officer,
Frontier Region Lakki.



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OFFICE OF THE AGENCY EDUCATION OFFICER F.R. LAKKI.

APPOINTMENT ORDER

Consequent upon the Selection, by Departmental committee, for recruitment The following local candidates of F.R. Lakki are hereby appointed against the newly created /vacant posts, Schools/ post/ BPS, noted against their names according to the new recruitment policy of the Government, in the interest of public service with effect from his/ her/ their taking charge in the schools.

Note: Beside other terms and conditions given in this appointment order, this appointment will remain open for any kind of appeal against the appointment, and the appointee will submit an affidavit to the effect, that if Institution/ Madrasa from where he/ she/ they have been educated and received in their/ their Degrees/ Certificate/ Sanads were found bogus OR declared as such standard, by any authorized committee, Court OR authority, He/ she/ they will face cancellation of his/ her/ their appointment happily and will deposit which has received as Salaries, into Government Treasury

S.No.	Name of Candidate with Score.	Father's Name	Designation/Place of posting	Remarks
1.	Abdul Waheed (55.44)	Mirat Khan	TT Post BPS, 14 GPS, Mirak Bhattani FR Lakki,	Vacant TT Post.

TERMS & CONDITIONS:

1. The appointment is made purely according to the existing Government recruitment policy/ rules and is subjected to the terms and conditions framed by the Government time to time. Moreover the appointment can be with drawn and is/are liable to termination without any notice, if any legal clerical or other kind of mistake arise there in.
2. If he/she/they wishes to resign from service, he/she/they will give one month's prior notice OR one month's full pay will be forfeited in lieu thereof.
3. He/she/they should produce their Health and Age certificate from Medical superintendent DHQ Hospital lakki Marwat.
4. He/she/they will not be handed over charge if Age is below 18 OR above prescribed age limit for new appointees.
5. If they resume the charge within 15 days his/her/their appointment will be considered as cancelled
6. His/her/their Domicile/Academic/ Professional (documents/Certificate) will be verified from the quarter concerned if found bogus, his/her/their appointment will be cancelled & strict action will be taken against the defaulters.
7. If any technical/legal flaw pointed out, Appointment of the concerned will be stand cancelled.
8. Charge reports should be submitted to all concerned.

(HAJI GHAZI KILAN)
AGENCY EDUCATION OFFICER,
FRONTIER REGION LAKKI.

Ends: No. 4775-80- / Dated the 22/07/2013

Copy for information to the:-

1. Director of Education FATA, Peshawar.
2. Deputy Commissioner/ PA/ APA FR Lakki
3. District Account's Officer Bannu/Lakki.
4. Principal/ I.M/ H.T (M/F) Concerned Schools
5. AEEO/Candidate Concerned.

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Agency Education Officer,
Frontier Region Lakki.
Agency Education Officer
F.R Lakki

(RAJA)

FR LAKKI TT
2013



OFFICE OF THE AGENCY EDUCATION OFFICER
FR Bannu at Bannu

APPOINTMENT ORDER:

Consequent upon the Selection, by Departmental Selection Committee, for recruitment during 2012 and on the Decision of Honourable Peshawar High Court Bannu bench vide Writ Petition No. 70-B/2015 announced on dated: 28/4/2015, the following Male candidate of Uthmanzai area FR Bannu is hereby appointed against the vacant CT post, vacancy verified by concerned AAEO (M/F), in the school of FR Bannu, according to the recruitment policy during 2012 of the Govt: In BPS-9, @ Rs. 6200/-PM plus usual allowances as admissible under the rules in the interest of public service with immediate effect.

Note:

Beside other terms and conditions given in this appointment order, this appointment will remain open for any kind of appeal against the appointee, and the appointee will submit an affidavit to the effect, that if Institutions/Madrasas from where he/she/they have been educated and received his/her/their Degrees/Certificates/Sanads, were found bogus OR Declared as Sub standard, by any authorized Committee, Court, OR authority. He/she/they will face cancellation of his/her/their appointment happily and will deposit what has received as Salaries, in Govt: treasury.

Sr	Name of candidate with Score	Father's name	Domicile	Open Merit/ Tehsil- wise	Place of posting.	Remarks	Vacancy Verified by
1	Raz Ali Khan (73.60)	Gul Raip Khan	Uthmanzai FR Bannu	Tehsil- wise	GHS Ghazi Killa FR Bannu	Against vacant CT Post.	Dafter Khan, AAEO

TERMS AND CONDITIONS:

- This appointment has been made purely according to the Government recruitment policy/rules, and is subjected to the terms and conditions framed by the Government time to time. Moreover this/these appointment can be with drawn and is liable to termination with out any notice, if any legal, clerical or other kind of mistake arise their in.
- If he/she/they wishes to resign from service, he/she/they will give one month's prior notice OR one month's full pay will be forfeited in lieu thereof.
- He/She/They will produce his/her/their Health and Age certificate from Medical Superintendent D.H.Q Hospital/Agency Surgeon concerned.
- He/She/They will not be handed over charge if his/her/their age is below OR above the prescribed age limit for new appointees.
- If he/she/they fails to resume charge within 15 days after issuing of this order, his/her/their appointment order/orders will be considered as cancelled.
- His/her/their Domicile/documents/certificates will also be verified from the Quarter's concerned and if found bogus, his/her/their appointment(s) will stand as cancelled.
- The candidate will submit an affidavit to the effect that he/she/they do not possess any kind of service in any Govt:/Semi Govt: Department.
- His/her/their pay will not be drawn till the verification of his/her/their all documents.
- If any technical/legal flaw is pointed out, appointment of the concerned will stand as cancelled.
- Charge reports should be submitted in duplicate to all concerned.

Enclst. No. 117c-78 /Estab:/2015.

Copy forwarded for information to the:

- Director of Education (FATA), Peshawar.
- Additional Registrar Peshawar High Cout Bannu bench.
- Deputy Commissioner Bannu.
- Assistant Political Agent FR Bannu.
- District Account Officer Bannu at Bannu.
- Principal/Headmaster/Headmistress/Head teacher concerned school(s).
- A.A.E.O (Male/Female) concerned area.
- Accountant local office/Office record.
- Candidate(s) concerned.

(ZAIT ULLAH KHAN)
Agency Education Officer
FR Bannu at Bannu.

Dated: 11/1/2015.

Agency Education Officer
FR Bannu at Bannu.

OFFICE OF THE AGENCY EDUCATION OFFICER

FR Bannu at Bannu

21

APPOINTMENT ORDER:

Consequent upon the Selection, by Departmental Selection Committee, for appointment during 2012 and on the Decision of Honourable Peshawar High Court Bannu bench vide Writ Petition No. 70-B/2015 announced on dated: 28/4/2015, the following Male candidates of Uthmanzai area Bannu are hereby appointed against the vacant PET posts, vacancies verified by concerned AEO (M/F), the schools of FR Bannu, according to the recruitment policy during 2012 of the Govt. in BPS-9, @ Rs. 00/-PIA plus usual allowances as admissible under the rules in the interest of public service with immediate effect.

Beside other terms and conditions given in this appointment order, this appointment will remain open for any kind of appeal against the appointment, and the appointee will submit an affidavit to the effect, that if institutions/Institutions from where he/she/they have been educated and received his/her/their Degrees/Certificates/Diplomas, were found bogus OR Declared as Sub standard, by any authorized Committee, Court, OR authority. He/she/they will have cancellation of his/her/their appointment happily and will deposit what has received as salaries, in Govt Treasury.

Sr	Name of candidate with Score	Father's name	Domicile	Open Merit/ Tehsil-wise	Place of posting.	Remarks	Vacancy Verified by
1	Muhammad Sholab Khan (58.26)	Zard Ali Khan	Uthmanzai FR Bannu	Tehsil-wise	GHS Ghazi Killa, FR Bannu	Against vacant PET Post.	Daffar Khan, AEO
2	Raza Khan (51.69)	Zar Wali Khan	Uthmanzai FR Bannu	Tehsil-wise	GMS Khawajadar Khol, FR Bannu	-do-	Daffar Khan, AEO

TERMS AND CONDITIONS:

- These appointments has been made purely according to the Government recruitment policy/rules, and are subjected to the terms and conditions framed by the Government time to time. Moreover this/these appointment can be with drawn and is liable to termination with out any notice, if any legal, clerical or other kind of mistake arise therein.
- If he/she/they wishes to resign from service, he/she/they will give one month's prior notice OR one month's full pay will be forfeited in lieu thereof.
- He/She/They will produce his/her/their Health and Age certificate from Medical Superintendent D.H.O Hospital/Agency Surgeon concerned.
- He/She/They will not be handed over charge if his/her/their age is below OR above the prescribed age limit for new appointees.
- If he/she/they fails to resume charge within 15 days after issuing of this order, his/her/their appointment order/orders will be considered as cancelled.
- His/her/their Domicile/documents/certificates will also be verified from the Quarter's concerned and if found bogus, his/her/their appointment(s) will stand as cancelled.
- The candidate will submit an affidavit to the effect that he/she/they do not possess any kind of service in any Govt./Semi Govt. Department.
- His/her/their pay will not be drawn till the verification of his/her/their all documents.
- If any technical/loyal flaw is pointed out, appointment of the concerned will stand as cancelled.
- Charge reports should be submitted in duplicate to all concerned.

(ZAIT ULLAH KHAN)
Agency Education Officer
FR Bannu at Bannu.

Endst. No. 1179-87 /Estab:/2015.

Dated: 11/5/2015.

Copy forwarded for information to the:

- Director of Education (FATA), Peshawar.
- Additional Registrar Peshawar High Court Bannu bench.
- Deputy Commissioner Bannu.
- Assistant Political Agent FR Bannu.
- District Account Officer Bannu at Bannu.
- Principal/Headmaster/Headmistress/Head teacher concerned school(s).
- A.E.O (Male/Female) concerned area.
- Accountant local office/Office record.
- Candidate(s) concerned.

Agency Education Officer
FR Bannu at Bannu.



OFFICE OF THE AGENCY EDUCATION OFFICER
BAJAUR AGENCY AT KHAR

2

22

APPOINTMENT

Consequent upon the approval by the Political Agent Bajaur and departmental selection committee the following AT male/female candidates of Bajaur Agency are hereby appointed/adjusted against vacant AT Posts purely on temporary basis in BPS 15 (M500-700-29500) plus usual allowances as admissible under the rules in the schools noted against their names in the interest of public service

S.No	Name of candidate	Pathe Name	Name of school where appointed	Remarks
1	Farman Ullah	Amir Nawab	GHS Mulla Qillah	Against vacant post open merit
2	Muhammad Hussain	Rahmat Sald	GHS Batwar Salarzai	Against vacant post Tehsil wise merit
3	Said Muhammad Ibrahim	Alam Zeb Khan	GHS Pashat	Against vacant post Tehsil wise merit
4	Shabir Ahmad	Said Muhammad	GHS Shinger Gut	Against vacant post Tehsil wise merit
5	Attaur Rahman	Ghulam Nazrat	GMS Chingul Salarzai	Against vacant post open merit
6	Shah Zaman Khan	Habib ur Rahman	GMS Kohli Salarzai	Against vacant post created school Tehsil wise merit
7	Waheeb Ullah	Mehnood Jan	GMS Deragh	Against vacant post Tehsil wise merit
8	Yusuf Nasser	Sharif	GMS Gahara	Against vacant post created school Tehsil wise merit
9	Attaur Rahman	Muhammad Younis	GMS Qambha Biring	Against vacant post created school open merit
10	Saeed Ullah	Gul-Badshah	GMS Pahoda Khel Targhaw	Against vacant post Tehsil wise merit
11	Hidayat Bibi	Shamir	GGMS Kohli Charming	Against vacant post open merit
12	Farima Bibi	Abdul Haq	GGHS Khar	Against vacant post Tehsil wise merit

15. Muzamir Palman	Mohd Fauzi Palman	CPA, Sarawak Chaman and	Special Agent Educational
16. Abdul Karim	Rizlan Ali	CPA, Sarawak	Special Agent Educational
17. Saion Bah	Khairun Palman	CPA, Sarawak	Special Agent Educational
18. Rashid, Wibi	Rahim Zoh	CPA, Sarawak	Special Agent Educational
19. Khalida Hibi	CPA Sarawak	CPA, Sarawak	Special Agent Educational
20. Salina Naz	CPA Sarawak	CPA, Sarawak	Special Agent Educational

TERMS/CONDITIONS.


1. Charge report should be submitted to all concerned in duplicate.
2. In case they wish to resign from their post, they will have to give one month notice for/for one month pay in lieu thereof.
3. All kinds of documents should be verified from the concerned institutions before the salary. They will not be entitled to get pay unless their Domestic "CPA" Award or professional qualification are not got verified from the institutions concerned. If their documents were found bogus in any stage their services will be considered as terminated from the appointment to this post.
4. The appointment of the candidates is being made purely on temporary basis & may be terminated any time without assigning any reason.
5. Health and age certificate should be produced to this office to be obtained from the surgeon concerned.
6. If he failed to report of his arrival within 15 days his appointment order will be treated as cancelled.

(Khaleq Bahmani)
Agency Education Officer
Bajaur Agency.

Encl No: 4365-70 Dated Khar 24.05.2013

- Copy of the is forwarded to the:
1. Director of Education (LATA) Peshawar.
 2. Agency Accounts Officer Bajaur Agency.
 3. AAO concerned.
 4. Accountant/Pay Clerk of the local office.
 5. Head Master concerned.
 6. Candidates Concerned.

7. P.A. Bajaur


Agency Education Officer
Bajaur Agency.

25

- 1. Change to certain duties should be submitted to the concerned...
- 2. The appointment order to be purely on temporary basis & liable to termination at any time without assigning any reason/notice.
- 3. The candidate wants to resign he will get 30 days' notice period for the same in the pay in hand thereof.
- 4. They would not be covered by/charged if their age exceed 35 years or less than 18 years.
- 5. They are to take over charge within 15 days the appointment order will be automatically cancelled.
- 6. They should produced their health and age certificate from the Agency at room...
- 7. They will be considered as regular but without pension or gratuity in terms of section 19 of the Government of Punjab services act 1973 as amended by the Punjab Civil Services (Amendment) Act 2005.
- 8. They will in lieu of certain gratuity be liable to receive such amount from the Government of Punjab as may be decided by the Government of Punjab on made by the Govt. in the account with the fund in the prescribed manner of the Govt. rules/policy.
- 9. They are entitled to get or deferred regular employees' except pension and gratuity.
- 10. The copy of the order will be given to the holder of all documents from the cancelled Board/Institution of the above candidates who is to be taken bogus, the appointment order of such candidate will be considered as cancelled from the date of appointment.

Agency Education Officer,
Orakzal Agency of Hangu.

Order No. 1216-81 / Dated Hangu, the 02/04/2013.

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Agency Education Officer,
Orakzal Agency of Hangu.

26

OFFICE ORDER

In view of Punjab Committee report recommendation dated, 13-12-2021, the undersigned being a competent authority is pleased to accept the appeal of the PST Teachers dated; 10-07-2021 as directed during the year 2014 appointed under order Endst: No.9239-43 dated; 20-08-2014 and order No.813-5 dated; 17-01-2015. The effected PST teachers 2014(NTS) shall be considered for the purpose of seniority only w.e.f. 23-07-2014 (i.e. appointment order 2014 NTS vide order No.8313-8514 dated; 23-07-2014) in the best interest of public service as per enquiry committee recommendation --A, given below:-

As the appellants are now regular employees and recommended by the DSC constituted under open advertisement 2014 and entered in the final merit list prepared under the ibid advertisement, therefore the seniority of appellants be fixed with the appointees of the first appointment order issued under order Endst: No.9239-43 dated; 20-8-2014 according to their own merit position. Keeping in view the civil servant seniority rules 1993, Rules 2 and the PWS Education Department, (Appointment & Regulation of service) Act 2018 (Cyber Panchajanya Act No. 1 of 2018) Rules 2.

In this regard necessary entry should be made in their S/Book accordingly please.

DISTRICT EDUCATION OFFICER
(MALE) BANNU

Endst: No. 11466-67 / Estab. (Try) Dated: 14-8-2022

- 1. Copy for information N/A to the
- 2. SDEO concerned.
- 3. District Account Officer Bannu.
- 4. Teacher concerned.

DISTRICT EDUCATION OFFICER
(MALE) BANNU

13/8/2022

صحت مناب = ڈائریکٹر ایلمنٹری اینڈ سیکنڈری ایجوکیشن
لیٹور

حکیمانہ اپیل ترقی دینے جانے بمطابق دیگر امداداران

صناب عالی

موردہ نامہ گزارش ہے کہ سال 2017ء میں بطور TT برتی ہوئی اور
جو کہ تقریباً پانچ سال بعد مقررہ بالا حکم جاری ہوا مگر استیمارے 2012ء
میں شائع ہوا تھا میرا سالہ دیگر امداداران کو 2013ء میں برتی جا
حکیمانہ دیا گیا ہے اور مجھے دینے سے انکاری ہے۔ لہذا استدعا ہے کہ
مجھے بھی سال 2013ء سے Effect دیا جائے جیسا کہ لکھی صورت
اور برتی اور باجوڑ کے اساتذہ کرام کو 2013ء سے Effect دیا
گیا ہے۔ موجودہ حکم خلاف قانون و انصاف ہے کیونکہ ہم سب آپس میں
استیمارے امداداران ہے۔ اس سے پہلے ہی درخواستیں گزار چکے ہیں لہذا
استدعا ہے کہ درخواست میرا کو منظور کی جائے۔

18/09/2018

مورحہ:

العارضین خلیج الرحمن

خلیج الرحمن ولد نفع اللہ خان
ساکن بنوں TT

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(14) (28)

**BEFORE THE HON'BLE PESHAWAR HIGH COURT,
BANNU BENCH**

WRIT PETITION No. 91-B /2019.

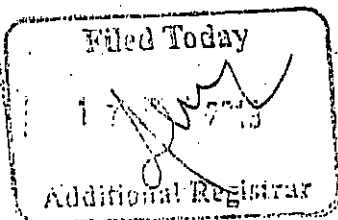
1. Shoib Ur Rehman son of Muhammad Sher (A.T).
 2. Muhammad Ayaz son of Nekam Khan (A.T)
 3. Rizwan Ullah son of Abdur Rahim. (A.T)
 4. Akbar Nawaz son of Gul Muhammad Khan (A.T)
 5. Munir Ahmad son of Hussain Ahmad (A.T)
 6. Muhammad Shareen son of Sher Bahadar Khan (A.T).
 7. Saeed Ullah son of Aziz Ullah (A.T)
 8. Amanullah son of Abdur Rehman. (A.T)
 9. Khalijur Rehman son of Nasar Ullah Khan (T.T)
 10. Abdur Rehman son of Zafar Khan (T.T).
 11. Muhammad Hanif Khan son of Inayat Ullah Khan (T.T).
 12. Sharit Ullah Khan son of Ghafar Khan (TT).
 13. Abdullah Khan son of Khan Zaman. (T.T)
 14. Noor Ullah son of Shahib Khan r/o Mali Shai Jani Khel (T.T).
 15. Muhammad Asghar son of Nazir Khan r/o Bizen Khel (A.T)
 16. Zahir Shah son of Noor Khan r/o Hindi Jani Khel (C.T)
 17. Muhamamd Saeed son of Inyat Ullah r/o Mali Khel Jani Khel (PTC)
 18. Wahid Ilah son of Mameer Ali R/O Sardi Khel (PTC)
-(Petitioners)
19. *All Residents Jani Khel Bannu.*
Versus. *Ar*

1. Additional Chief Secretary FATA, FATA, Secretariat Sarsak Road Peshawar.
2. Director Education FATA, FATA Secretariat Warsak Road, Peshawar.
3. Agency Education Officer Tazeeri Bizen Khel F.R, Bannu.....(Respondents)

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION
OF THE ISLAMIC REPUBLIC OF PAKISTAN, 1973.

PRAYER:

ON ACCEPTANCE OF THIS WRIT PETITION, THIS HONOURABLE COURT MAY GRACIOUSLY ISSUE DIRECTIONS TO RESPONDENTS TO VERIFY THE SERVICE BOOKS OF THE PETITIONERS SINCE THE YEAR 2013 AND OTHER BACK BENEFITS, ARREARS/SALARIES MAY ALSO BE GRANTED SINCE THE YEAR 2013 TILL THE APPOINTMENTS OF THE PETITIONERS. OTHER RELIEF IF ANY ALSO BE GRANTED.



TESTED

Peshawar High Court,
Bannu Bench

1 29-

PESHAWAR HIGH COURT,
BANNU BENCH.

FORM 'A'

FORM OF ORDER SHEET

Date of order or proceedings	Order or other proceedings with signature of Judge (s).
(1)	(2)
16.11.2022	<p><u>W.P No.91-B/2019.</u></p> <p>Present:</p> <p>Mr. Masood-ur-Rehman Wazir Advocate for petitioner.</p> <p>Sardar Muhammad Asif, Asstt: AG for official respondents.</p> <p>***</p> <p>SHAHID KHAN, J.---The matter was heard at extensive length, where the learned counsel for the petitioner wanted this Court to test the question of seniority which we feel this Court is lacking jurisdiction.</p> <p>The learned counsel for petitioner admitted at the bar and so the record tells that the petitioner is a civil servant and in case of civil servant the seniority is purely a question that falls within the jurisdiction of competent forum created for the purpose and both the sides are well aware of the fact that embargo is placed upon jurisdiction of this Court under Article 212 of the Constitution, as</p>

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ATTESTED

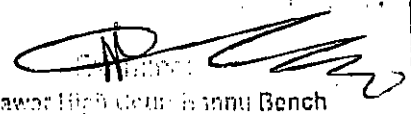
EXAMINER
PESHAWAR HIGH COURT
BANNU BENCH

such, competent forum has been created to test the relevant subject. Thus we are afraid this court is lacking jurisdiction, as such, the instant petition being bereft of merit is dismissed.

Announced.
16.11.2022.

Sd/Mr Justice Sahibzada Asadullah J
Sd/Mr Justice Shahid Khan J

CERTIFIED TO BE TRUE COPY



Peshawar High Court Sannu Bench
Authorized Under Article 87 of
The Qanun-e-Shahadat Ordinance 1988



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17/11/2022

17 NOV 2022
MAAD

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Date of Presentation of Application 06-12-2022

No of Pages 248

Copying Fee 1

Agent Fee 1

Total 961

Date of Proceeding 08/12/2022

Date Given for Judgment " " "

Date of Delivery of Copy 08-12-2022

Received By *civil cell*

WAKALAT NAMNA**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,**
PESHAWAR

SERVICE APPEAL NO. ___/2022

Khalij Ur Rehman.....APPELLANT

...VERSUS...

The Govt of KP & others.....RESPONDENTS .

I, Khalij Ur Rehman S/O Nasr Ullah JAn, Resident of Handi Khel, Jani Khail, Presently posted as a Theology Teacher (TT BPS-15), at GPS- Kala Khan, District Bannu NIC No. 22201-2850109-9, the appellant in the above noted Service appeal, do hereby appoint and constitute **Mr. Sajjad Ahmad Mehsud Advocate High Court & Federal Shariat Court of Pakistan & Muhammad Kareem Afridi Advocate**, as my counsels in the above proceedings and authorize him to appear, plead, defend, act, compromise, withdraw, negotiate or refer to arbitration for me as my advocate/legal attorney in the above mentioned matter, without any liability for his default and with the authority to engage/ appoint any other Advocate/ Counsel on my/our behalf and all sums and amounts deposited on my/our account in the above noted matter.

ATTESTED & ACCEPTED

Sajjad Ahmad Mehsud

&

M. Kareem Afridi

Advocates High Court,

CNIC # 12101-7704895-5

(BC-15-5659)

Suite# 2nd Floor 39-40, Liberty Mall, Tambawano Mor University Road,
Peshawar. Cell: 0333-9981464

خلیج اوری