

**BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK**  
**PESHAWAR**  
**Service Appeal No. 831/2022**

Waheedullah Shah

..... Appellant

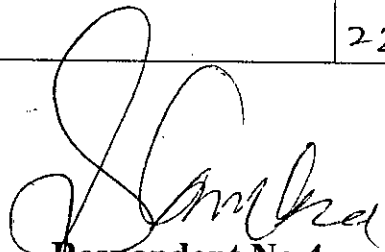
**VERSUS**

District Education Officer (M) Bannu & Others

..... Respondents

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**Respondent No.4**  
**Taj Murad, Junior Clerk**  
**Office of the DEO (M)**  
**Bannu**

**BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK**  
**PESHAWAR**  
**Service Appeal No. 831/2022**

Waheedullah Shah

..... Appellant

**VERSUS**

District Education Officer (M) Bannu & Others

..... Respondents

Joint parawise comments on behalf of Respondent No.4, Taj Murad Junior Clerk Office of DEO (M) Bannu

Respectfully Sheweth!

**PRELIMINARY OBJECTIONS ON SERVICE APPEAL:**

- 1- That the appellant has got no cause of action and locus standi to file the instant appeal.
- 2- That the appeal of the appellant is not maintainable in its present form.
- 3- That the appeal of the appellant is also bad for mis-joinder and non-joinder of the necessary parties as he has not impleaded the Government as well as the members of the DPC committee in his service appeal. Therefore, the appeal is liable to be dismissed (2010 SCMR 115) (PLJ 2022 SC (AJK) 06).
- 4- That the appellant was failed in typing test held on dated 13-03-2020 at DEO (M) Office Bannu, so he is not fit according to present promotion policy notification No. SOE(V) (E&AD/1-35/2014 dated Peshawar the 18<sup>th</sup> July, 2019.
- 5- That the appellant is low in merit position in seniority list of Class IV employees for promotion to the Junior Clerk updated upto 31-12-2021.
- 6- That the appellant has not made any departmental appeal / application review before institution of this service appeal.
- 7- That the appellant was failed in typing test conducted by Respondent No.1 for promotion to the post of Junior Clerk, so he considered as failed.
- 8- That the appeal of the appellant is badly barred by law and limitation.

**FACTS**

- 1- Para No.1 of the appeal pertains to educational qualifications record of the appellant.
- 2- Para No.2 pertains all the service record of the appellant, hence refused.
- 3- Para No.3 pertains to the existing promotion policy of the Government.

- 4- Para No.4 pertains to seniority list updated upto 31-12-2020 and seniority list updated by the department upto 31-01-2021.
- 5- That respondent No.1 informed and called for typing test all those candidates (Class IV employees) included respondent No.4 waiting for their promotion to the post of Junior Clerk, in which 33 candidates appeared in the test and the remaining were absent and appellant failed. Respondent No.4 qualified the test by obtaining 58 marks out of 100. So, respondent No.4 promoted to the post of Junior Clerk according to the policy/ Notification dated 18-07-2019 by own efficiently.
- (i) Copy of general information is Annex as "A".
- (ii) Copy of attendance in typing test dated 13-03-2020 is Annex as "B".
- (iii) Copy of the given paragraph for typing test is annexed as "C".
- (iv) Copy of answer paper of respondent No.4 is annexed as "D".
- (v) Copy of result of typing test dated 13-03-2020 is annexed as "E".
- (vi) Copy of notification dated 18-07-2019 is annexed as "F".
- (vii) Copy of promotion order dated 14-03-2020 of the respondent No.4 is annexed as "G".
- 6- That para No.6 pertains to the record of respondent No.1 office.
- 7- That para No.7 pertains to judicial record of Peshawar High Court Circuit bench of Bannu District.
- 8- That para No.8 refused and no knowledge.
- 9- That para No.9 is also pertains to judicial file of Honourable PHC Circuit Bench Bannu.

**GROUND:**

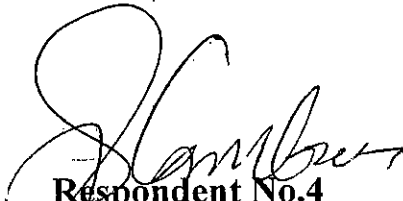
- (A) That it is the responsibility of the appellant to submit application for correction in the list with in time, but he failed to do so, further the appellant does not come in the seniority-cum-fitness.
- (B) That respondent No.4 comes in the definition of seniority-cum-fitness as he promoted by his own efficiently.
- (C) That no animosity, no favoritism, no discrimination shown by the respondent No.1 with anyone in this promotion. Promotion of Respondent No.4 has made by qualifying typing test.

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(D) That promotion of respondent No.4 was not based on favoritism, but was on ability of typing speed and proper process of law.

**PRAYER:**

It is therefore, humbly prayed that on acceptance of these joint para wise reply / comments in response to an appeal filed by the appellant, the appeal in hand may very graciously be dismissed with heavy cost throughout.

  
**Respondent No.4**  
**Taj Murad, Junior Clerk**  
**Office of the DEO (M)**  
**Bannu**

(4)

'A'



# DISTRICT EDUCATION OFFICER (MALE) BANNU

Phone No: 0928-660005 Fax No: 0928-660346

Email Id: bannuedo@yahoo.com



## اطلاع عام

مقام پر انسپشن، ہیڈ ماسٹرز، ہیڈ ٹیچر / ایس ڈی ای اوز / اے ایس ڈی ای اوز کو اطلاع دی جاتی ہے

کہ کلاس فور ملازمین کی ٹائپ لسٹ دفتر 2020-03-13 کو ڈی ای او مردانہ آفس میں بوقت

09 بجے تا نوپہر 2 بجے تک ہوگا۔ بر کلاس فور ملازمین کو مزیدہ متعلقہ انسپشن کے توسط سے اطلاع دی ہے

.....

2020-03-8

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# List of Attendance 'B'

(5)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BANNU, Not Vailed ( )  
 TYPING TEST FOR PROMOTION FROM CLASS IV TO JICLERK ON DATED 13-03-2026 AT DEO MALE OFFICE BANNU

No.	Name	Service	Designation	Qualification for promotion to JIClerk	Mol. No.	Roll No.	Signature of Candidate	Signature of Officer
1	Mohammed Ishtaq	GPS Pindi Mitha	Chowkidar	FA				
2	ABDUL SAMAD KHAN	GPS SABOONHEL ABDUL QAYUM	CHOWKIDAR	FA				
3	Rafiq Ullah Khan	GNS Khujan Babar Bannu	NA Qasid	FA	0334975385	11101-0942625-9	<i>[Signature]</i>	<i>[Signature]</i>
4	FALAK NAZ	GHS NO-3 BANNU	LAB ATTENDENT	FA				
5	Afsal Ali Shah	GHS No.1 Bannu	Lab Attendent	FA				
6	WAHIDULLAH SHAH	GPS GUL SHAHDARAZ KAKKI	Chowkidar	FA	03329745602	11101-5924215-7	<i>[Signature]</i>	<i>[Signature]</i>
7	HAFIZ HAMID ULLAH	GPS BAYAZ KHAN DARDARIZ	Chowkidar	FA	03339726977	11101-1460026-1	<i>[Signature]</i>	<i>[Signature]</i>
8	Muhammad Ibrahim	GHS Bilawar Khan Bannu	Sweeper	FA	03429346577	11101-7348832-5	<i>[Signature]</i>	<i>[Signature]</i>
9	ABDUR RAUF KHAN	GHS NURAR BANNU	NAIB GASID	FA	03329740272	11101-9815468-5	<i>[Signature]</i>	<i>[Signature]</i>
10	MUJAHID KHAN	GFS NAR MANI KHAN	Chowkidar	FA				
11	Muhammad Usman	GHS No.2 Bannu	NA Qasid	FA	0333-9916555	11101-5263262-3	<i>[Signature]</i>	<i>[Signature]</i>
12	JAVED ZAMAN	GFS AMIR KHAN BHARAT	Chowkidar	FA				
13	NASRALI KHAN	GPS HAYAT KAKKI	Chowkidar	FA	03329725245	11101-5928886-1	<i>[Signature]</i>	<i>[Signature]</i>
14	SAAD ULLAH KHAN	GHS NO-1 BANNU	CHOWKIDAR	FA				

District Education Officer (Male) Bannu

(5)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BANNU (Not Vailed for Court)  
 TYPING TEST FOR PROMOTION FROM CLASS-IV TO J/CLERK ON DATED 13-03-2020 AT DEO MALE OFFICE BANNU

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Name	Roll No.	Service Location	Designation	Emp. Category for Promotion J/Clerk	Mobile No	CNIC	KEY COPY OF THE TEST RECEIVED	Signature
Asif Khan		GHS No.2 Bannu	Beelar	FA	0331-9154746	11101-9105496-1		
ASHRAFULLAH	06151561	GHS BAHADAR MANAK KHEL	JIAN	FA	0334-9286874	11101-98233745-3		
Zahid Rahman		GPS Sekari Jabbar No 1	CHOWKIDAR	FA				
Taj Murad Khan		DEO Male Bannu	NO (WCI)	FA	03329734194	11101-0812433-7		
Rasool Khan		DEO Male Bannu	Daftari	FA	03369602742	11101-20411729-3		
Noor Afzal Khan		GPS Pak ismaili khel	Chowkidar	FA				
Safid Khan		GPS Mosa khel baram	Chowkidar	FA				
ALAM ZEB KHAN		GPS NAWAB KHAN DARDARIZ	Chowkidar	FA	03088160567	11101-1137477-9		
Taza Khan		GHS Buzan Khel Bannu	Chowkidar	FA	03368740990	11101-5184194-7		
ZIA UL ISLAM		GPS KHUJARY KHAAS	Chowkidar	FA				
Sharifullah		GHS Ismaili Mama Khel Bannu	Sweeper	FA	03359737121	11101-6107754-1		
UMER SARFARAZ KHAN		GPS FAIZ TALAB AEBAS NO 1	CHOWKIDAR	FA				
Kashif Khan		GPS Jameel Khan Nurar	Chowkidar	FA	03355901918	11101-3499697-1		
HISAN ULLAH		GPS NO.7 GHORIWALA	Chowkidar	FA	03305398424	11101-3793144-3		

District Education Officer (Male) Bannu

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(7)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BANNU (Not Vailed for Court)  
TYPING TEST FOR PROMOTION FROM CLASS IV TO J/S LERK ON DATED 13-03-2020 AT DEO MALE OFFICE BANNU

(3)

Sl. No.	Name	School Office	Designation	Qualification for promotion to J/S L	Mobile No.	Roll No.	Signature	Signature
29	WEGAR KHAN							
30	MUHAMMAD BILAL	GPS LANBILA SELANI	Chowkidar	FA	03364761167	11101-6020643-7	Wegar	Wegar
31	Iknoolah	GPS Fatmakhel	Chowkidar	FA				
32	Abdullah Khan	GPS NO 2 BANNU	CHOWKIDAR	FA				
33	MUHAMMAD ALI KHAN	GPS DEGAN KHAAS	Chowkidar	FA				
34	ABDUL QAYUUM	GPS IMTIAZ KHUJRAM KHEL	Chowkidar	FA				
35	Dil Faraz Khan	GHS Bazar Ahmad Khan Bannu	N/Oasid	FA	03358350544	11101-1520422-7	Dil Faraz	Dil Faraz
36	GUL AJAB MOOR	GPS SHAHBAZ KAKKI NO.2	Chowkidar	FA				
37	Gilabaz Khan	GPS Zahar Dast Mandew	Chowkida	FA	03005760350	11101-5691724-3	Dilabaz	Dilabaz
38	IRFANULLAH KHAN	GPS JAHANGIR KAKKI	Chowkidar	FA	03329721182	11101-1475799-7	Irfanullah	Irfanullah
39	RAHMAT ULLAH KHAN	GPS WALHI MAMAKHEL	Chowkidar	FA	03340933445	11101-1462231-7	Rahmat Shah	Rahmat Shah
40	FARMANULLAH KHAN	GPS MAZANGA LANDIDAK	Chowkidar	FA	03325728000	11101-4257205-9	Farmanshah	Farmanshah
41	MUHAMMAD LIAZ	MUHAMMAD AYAZ GPS Bazar Mandew	N/Oasid	FA	03348806356	11101-5814820-3	Muhammad Liaz	Muhammad Liaz
42	Ihsanullah Khan	GPS No2 Ghoriwala Bannu	Chowkidar	FA				

District Education Officer (Male) Bannu

(4)



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4

TEST FOR PROMOTION FROM CLASS IV TO CLASS III, MALE, 1950-1951 (THE VARIOUS PARTS OF THE TEST FOR PROMOTION FROM CLASS IV TO CLASS III, MALE, 1950-1951 DEPARTMENTAL OFFICE BARR)

Sl. No.	Name	Age	Qualification for promotion to Class III	Grade	Pay Band	Grade	Pay Band
54	...	...	...	FA	0336 5858087	11101-9503385-1	...
55	...	...	...	BA/DIT	0336 5858087	11101-9503385-1	...
56	...	...	...	BA	0336 5858087	11101-9503385-1	...
57	...	...	...	FA	0336 5858087	11101-9503385-1	...
58	...	...	...	FA	0336 5858087	11101-9503385-1	...

Signature

57

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OFFICE OF THE DISTRICT EDUCATION OFFICER (Male) BANNU  
TYPING TEST FOR PROMOTION FROM CLASS IV TO JOLEPKON DATED 11-01-2020 AT DEO MALE OFFICE BANNU

Sl. No.	Name	Address	Category	Grade	Mobile No.	Roll No.	Signature	Signature
43	M. Mustafiz	GHS Mulla maqbool wala Ebnou	Sweeper	FA				
44	Shahua Ali Shah	GHS PIR SABER SHAH	CHOWKIDAR	FA				
45	Fahh Ullah Khan	GHS Gul Zaman Ghoriwala Bannu	Sweeper	FA	03002054026	11/01-0810200-3		
46	ZAFIRULLAH KHAN	GHS NEKUM KAKKI	Chowkidar	FA				
47	MURAD ALI KHAN	GHS LEWAN BARDARIZ	Chowkidar	FA				
48	Kashif Khan	GHS Fazal haq malwana	Chowkidar	FA				
49	Zafran Khan	GHS Bazida yousaf Khan	Chowkidar	FA				
50	MEHRULLAH KHAN	GHS AMINUDDIN KHAWAJAMAD LANDICAK	Chowkidar	FA	03338725026	11/01-8846885-1		
51	Hidayat Ullah	GHS Ismaili Mansa Khat Bannu	Lab Attendant	FB		11/01-1162156-1		

Last Date for correction on 07-03-2020// GHSS, GHS, GMS, GP's through SMS, Whatsapp by the Direction of DEO Male Bannu.

Mehmood Khan  
Assistant B-15  
  
Member.

Ihsanullah Khan  
PA to DEO M Bannu  
  
Member.

Raham Dad  
S/Clerk  
  
Member.

Farzand Ali Khan  
Supdt: Member

Chairman  
District Education Officer  
District (Male) Bannu  
(Male) Bannu

97 98

Office of the District Education Officer (Male) Bannur.

Typing Test for Junior Clerk

Total Lines of Text: 150  
 Total words: 150  
 Speed: 20 words per minute  
 Total marks: 100  
 Passing marks: 50

Typing Paragraph

1- The human body is a gift of God. It is like a machine. It is one of our greatest duties to take care of it. We must try our best to keep ourselves healthy and fit. We should take the right quality and right quantity of food. We should take care to protect ourselves from diseases.

2- The requirements of good health can be divided in to three categories. We should take the right quality and right quantity of food. We should take care to protect ourselves from diseases.

3- Some children have strange habits about food. They have a strong dislike for certain things and a strong dislike for others. For instance a child may not drink milk and is fond of tea. This means he is depriving himself of a valuable food.

①  
 D.E.O (M)  
 Bannur. 13/3/2022  
 MS# 13/3/2022  
 Mechanical Exam -  
 ②  
 ③  
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Office of the District Education Officer (Male) Bannur.

Typing Test for Junior Clerk

Total Time: 15 min  
Total words: 150  
Speed: 30 words per min  
Total Marks: 100  
Passing marks: 50

Typing Paragraph:

1- The human body is a gift of God. It is like a machine that we can make such a perfect machine as the human body. It is one of our greatest duties to take care of it. We must try our best to keep ourselves healthy and fit.

2- The requirements of good health can be divided in to three parts. We should take the right quality and right quantity of food. We should have a good sleep which promote good health. We should take care to protect ourselves from diseases.

3- Some children have strange habits about food. They have a strong dislike for certain things and a strong dislike for others. For instance a child may not drink milk and is fond of tea. This means he is depriving himself of a valuable food.

①  
D.E.O (M)  
B.Xu - 13/3/2020  
②  
H.S.H: 13/3/2020  
Machmood Khan -  
③  
Khanmullah  
S/C Sec 12 -  
④  
Fazal Ali - s/pt  
Fazal Ali - s/pt  
⑤  
⑥

Memo: 67 per word

10

'D' (11)

18 (11) (11) (11)

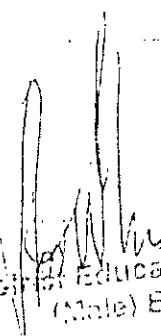
The human body is a gift of god. It is like a machine, but no inventor can make such perfect machine as the human body. It is one of your foremost duties to take care of it. We must try our best to keep ourselves healthy and fit.

The requirements of food can be divided into three categories. We should take the right quality and right quantity of food. We should have habits which promote good health. We take care to protect ourselves from diseases.

some children

C/S

0323-7134194  
13/3/2020

  
District Education Officer  
(Male) Banaru

DEO (M)  
13/3/2020

(26)

'E'

(12)



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BANNU

STATEMENT SHOWING RESULT OF PROMOTION FROM CLASS I. TO JUNIOR CLERK TEST HELD AT DEO (M) BANNU ON DATED 13.03.2020.

S.#	NAME	ROLL NO.	TOTAL MARKS	MARKS OBTAINED	REMARKS
1-	RIFATULLAH KHA	03	100	00 (ZERO)	FAILED
2-	WAHEED ULLAH SHAH	06	100	00 (ZERO)	FAILED
3-	H.HAMEED ULLAH	07	100	00 (ZERO)	FAILED
4-	M.IBRAHIM	08	100	00 (ZERO)	FAILED
5-	ABDUR RAUF	09	100	00 (ZERO)	FAILED
6-	M.USMAN KHAN	11	100	24. (TWENTY FOUR)	FAILED
7-	NASER ALI KHAN	13	100	09. (NINE)	FAILED
8-	ASIF KHAN	15	100	31. (THIRTY ONE)	FAILED
9-	ASHRAFULLAH	16	100	12 (TWELEVE)	FAILED
10-	TAJ MURAD KHAN	18	100	58 FIFTY EIGHT)	PASSEL
11-	RASOOL KHAN	19	100	00 (ZERO)	FAILED
12-	ALAM ZEB KHAN	22	100	05 (FIVE)	FAILED
13-	TAZA KHAN	23	100	00 (ZERO)	FAILED
14-	H.SHRIFULLAH	25	100	00 (ZERO)	FAILED
15-	KASHIF KHAN	27	100	14. (FOURTEEN)	FAILED
16-	IHSANULLAH	28	100	06. (SIX)	FAILED
17-	WIQAR KHAN	29	100	00 (ZERO)	FAILED
18-	DIL FARAZ KHAN	35	100	00 (ZERO)	FAILED
19-	DILA BAZ KHAN	37	100	22. (TWENTY TWO)	FAILED
20-	IRFANULLAH KH	38	100	11. (ELEVEEN)	FAILED
21-	REHMATULLAH SHA	39	100	35. (THIRTY FIVE)	FAILED
22-	FARMAN ULLAH	40	100	18. (EIGHTEEN)	FAILED
23-	MUHD: DIAZ KH	41	100	00 (ZERO)	FAILED
24-	FATIH ULLAH	45	100	22. (TWENTY TWO)	FAILED
25-	MEHERULLAH	50	100	17. (SEVENTEEN)	FAILED
26-	HIDAYATULLAH	51	100	00 (ZERO)	FAILED
27-	IMRANULLAH	52	100	15 (FIFTEEN)	FAILED
28-	ASGHAR ALI KHA	53	100	16. (SIXTEFN)	FAILED

1, MAREEM ULLAH  
SIC  
2, IHSANULLAH  
SIC  
3, ASHRAF ULLAH  
SIC  
4, RASHID DAD  
SIC

e/s  
District Director (M)  
(Male) Bannu

29-	HAMEEDULLAH	54	100	50. (FIFTY)	PASSED
30-	NASIR KHAN	55-	100	16. (SIXTEEN)	FAILED
31-	ZAHOR ANWAR	56	100	00 (ZERO)	FAILED
32-	MUHD: MASOOD	57	100	37. (THIRTY SEVEN)	FAILED
33-	IBRAR KHAN	58	100	00 (ZERO)	FAILED

*[Handwritten signature]*

13/3/22

District Education officer

(Male) Bannu  
District Education Office  
(Male) Bannu

*[Faint handwritten notes]*

- 1- *[Signature]* Assistant B-16
- 2- *[Signature]* PA to DEO (M) Bannu - 1-4
- 3- *[Signature]* Deput Assistant B-14
- 4- *[Signature]* S/ Clerk B-14



(F)

Office

GOVERNMENT OF PUNJAB  
ESTABLISHMENT  
DEPARTMENT

(14)

NOTIFICATION

PROVISIONS OF THE PUNJAB CIVIL SERVICE (REGULATIONS) ACT, 1973

In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Punjab Civil Service (Regulations) Act, 1973, the Government of Punjab, in consultation with the Finance Department, is hereby directed that in this Department's Establishment Rules, 1953, the following amendments shall be made, namely:

AMENDMENTS

For Serial No. 4, the following shall be substituted, namely:

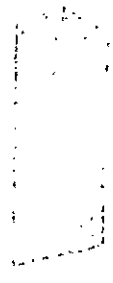
2.	3.	4.	5.
<p>(i) PAF F Sc with second division or equivalent qualification from a recognized Board; and</p> <p>(ii) a speed of thirty (30) words per minute in typing.</p>	<p>18 to 30 years.</p>	<p>(a) Forty per cent by promotion, on the basis of seniority-comparability, from amongst Extra-Deputy Secretaries, Deputy Secretaries, Assistant Secretaries, and Naib Secretaries including holders of other equivalent posts in the Secretariat with two years' experience as such, who have passed PAF F Sc Examination or its equivalent qualification from a recognized Board; and</p> <p>(b) sixty per cent by initial recruitment.</p>	<p>Note: For the purpose of promotion, there shall be maintained a common seniority list of Darildars, Deputy Secretaries, Assistant Secretaries, Naib Secretaries, etc. with reference to the dates of their acquiring the PAF F Sc qualification.</p>

(15)

<p>in accordance with the provisions of the rules and regulations of the Government of West Bengal. The Government will be maintaining a list of the names of the officials who are eligible for promotion to the post of Junior Clerk.</p>	<p>(ii) Where a senior official does not possess the requisite qualification at the time of filling up a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials.</p>	<p>Provided further that The condition FAFS-Sc or its equivalent qualification from a recognized Board, as laid down in clause (c) shall not apply for a period of two years from the date of commencement of this Notification to the existing matriculate incumbents of the post of Daftrs, Gestetner Operators, Casids and Naib Qasids including holders of other equivalent posts for promotion to the post of Junior Clerk (BS-11).</p>
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CHIEF SECRETARY  
KHYBER PAKHTUNKHWA

(16)



1. The Government of Punjab, Lahore, has the honor to acknowledge the receipt of your letter of the 15th instant regarding the above subject.

2. The Government of Punjab, Lahore, has the honor to inform you that the Government of Punjab, Lahore, has no objection to the issue of the above mentioned letter to the Government of Punjab, Lahore, for their consideration.

3. The Government of Punjab, Lahore, has the honor to inform you that the Government of Punjab, Lahore, has no objection to the issue of the above mentioned letter to the Government of Punjab, Lahore, for their consideration.

4. The Government of Punjab, Lahore, has the honor to inform you that the Government of Punjab, Lahore, has no objection to the issue of the above mentioned letter to the Government of Punjab, Lahore, for their consideration.

5. The Government of Punjab, Lahore, has the honor to inform you that the Government of Punjab, Lahore, has no objection to the issue of the above mentioned letter to the Government of Punjab, Lahore, for their consideration.

6. The Government of Punjab, Lahore, has the honor to inform you that the Government of Punjab, Lahore, has no objection to the issue of the above mentioned letter to the Government of Punjab, Lahore, for their consideration.

HAZRAT JAMAL  
SECTION OFFICER (E.V.)

OFFICE OF THE DISTRICT EDUCATION OFFICER (M.A.L.T.) BANNA

PROMOTION ADJUSTMENT ORDER

Consequent upon the recommendation by the DPC/DSC Committee for the year 2017-18, the following Government Servants Education Department District Banna are to be promoted and adjusted in vacant B.Clerk post, with the date of posting, as mentioned in the table below, out of the promotion quota on the basis of seniority cum fitness in the order of merit dated: 18 July, 2017 on merit basis as per the terms & conditions given below.

S.N.	NAME & DESIGNATION	Place of posting	Adjusted as Clerk	REMARKS
1	Mr. M. S. Khan B.Clerk	Government of Banna	CHS M.A.L.T. Banna	Adjusted as per the terms & conditions given below.
2	Mr. M. S. Khan B.Clerk	Government of Banna	CHS M.A.L.T. Banna	Adjusted as per the terms & conditions given below.

TERMS & CONDITIONS:-

1. The promotion is issued as per the approval of DPC/DSC, on the basis of seniority cum fitness.  
 2. The promotion is issued for a period of one year extendable for another year.  
 3. If the promotion is reversed at any time without assigning any reason, the promotion will be treated as null and void.  
 4. The promotion is subject to the availability of the post.  
 5. The promotion is subject to the availability of the post.  
 6. The promotion is subject to the availability of the post.

CHIEF DISTRICT EDUCATION OFFICER  
 M.A.L.T. BANNA

For information and necessary action to the District Education Officer, Department M.A.L.T. Banna the 14/03 2018

1. Director of Education, Government of Banna  
 2. District Education Officer, Government of Banna  
 3. District Education Officer, Government of Banna  
 4. District Education Officer, Government of Banna  
 5. District Education Officer, Government of Banna  
 6. District Education Officer, Government of Banna  
 7. District Education Officer, Government of Banna  
 8. District Education Officer, Government of Banna  
 9. District Education Officer, Government of Banna  
 10. District Education Officer, Government of Banna

DISTRICT EDUCATION OFFICER  
 M.A.L.T. BANNA

- 5 -

*(Handwritten signature)*

(17)

(5)

2018

44

13/3/2020  
Box 1

DE-0 (M)  
STANDARD EDUCATION OFFICE  
(MUMBAI) PUNE

*[Handwritten signature]*  
c/signed

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Wahedullah Shah

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Wahedullah Shah

13/3/2020

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**BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK**  
**PESHAWAR**

**Service Appeal No. 831/2022**

Waheedullah Shah

..... **Appellant**

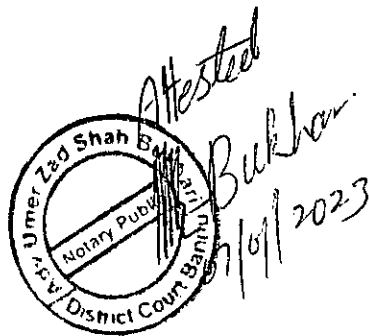
**VERSUS**


District Education Officer (M) Bannu & Others

..... **Respondents**

**AFFIDAVIT**

I, Mr. Taj Murad Junior Clerk of District Education Officer (Male) Bannu, do hereby solemnly affirm and declare on Oath that contents of this para wise reply / comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



  
**Respondent No.4**  
**Taj Murad, Junior Clerk**  
**Office of the DEO (M)**  
**Bannu**