

S.No.	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	10.11.2021	<p style="text-align: center;"><u>KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,</u> <u>PESHAWAR.</u></p> <p style="text-align: center;">Service Appeal No. 7206/2021</p> <p>Sami Ul Haq son of Muhammad Khan SST, Government Higher Secondary School, Pir Abad, Tehsil Takht Bhai, District Mardan. ... (Appellant)</p> <p style="text-align: center;"><u>Versus</u></p> <p>1. District Education Officer (Male) Mardan and two others. ... (Respondents)</p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p style="text-align: center;"><u>AHMAD SULTAN TAREEN, CHAIRMAN.-</u></p> <p>Counsel for the appellant present. Preliminary arguments have been heard. Memorandum of Appeal and documents annexed therewith have been perused.</p> <p>2. The appellant through this Service Appeal has challenged the order of respondent No. 3 dated 13.05.2019 vide which the former was promoted to the post of SST BPS- 16 and he was ignored from promotion in the year 2017 when his junior was promoted on 11.08.2017. The appellant prayed that the impugned order dated 13.05.2019 may be set aside and he may be promoted to BPS-16 from 11.08.2017 with all back benefits. The appellant vide submissions at Para-3 of the Memorandum of appeal purports that he was eligible and entitled for promotion on the post of SST (inadvertently written as PST) but the respondents ignored him and promoted</p>

his junior colleague in BPS-16 vide order dated 11.08.2017. It is also purported in the appeal that the appellant filed departmental appeal against order dated 11.08.2017 which was rejected by respondent No. 3. The copy of the said appeal is annexed with the Memorandum of Appeal at Page 21 according to the Index whereupon the date of its receipt on diary is given as 16.08.2017. The said appeal is addressed to the Director of Education Peshawar with the subject for inclusion of his name in SST promotion list but there is no mention in the appeal about grievance of the appellant against the order dated 11.08.2017. There is a copy of another application dated 07.06.2019 in the name of Director of Education whereby a request has been made by the appellant for including his name in the SST promotion list dated 13.05.2019 but it does not disclose as to any specific grievance of the appellant regarding the order dated 13.05.2019 as impugned in the present appeal. Needless to say that the appellant after submitting an application dated 16.08.2017 regarding inclusion of his name in the SST promotion list went into hibernation without further pursuit in accordance with law. So, if there was any violation of his right as to promotion, he should acquiesced in the same. After having been promoted vide order dated 13.05.2019 he came out of hibernation to prefer the present service appeal on 29.06.2021 again after two years of his promotion on the post of SST. In view of insalubrious attitude of the appellant toward his career in service, he is not entitled for giving liberty to challenge the impugned orders having become the past and



closed transactions. This appeal being badly time barred besides suffering from other deficiencies is not fit for regular hearing and is hereby dismissed in limine. File be consigned to the record room.

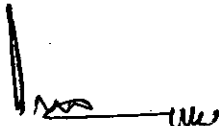

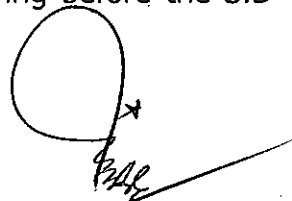
  
(AHMAD SULTAN TAREEN)  
Chairman

ANNOUNCED  
10.11.2021

Form-A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 7206 /2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/08/2021	<p>The appeal of Mr. Sami-ul-Haq resubmitted today by Mr. Irfan Ali Yousafzai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>20/09/21</u>.</p> <p> CHAIRMAN</p>
	20.09.2021	<p>Learned counsel for the appellant present.</p> <p>Learned counsel for the appellant requested for adjournment on the ground that he has not prepared the brief. Adjourned. To come up for preliminary hearing before the S.B on 10.11.2021.</p> <p> (MIAN MUHAMMAD) MEMBER (E)</p>

The appeal of Mr. Samiul Haq SST GHSS Pir Abad Mardan received today i.e. on 29.06.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ① Copies of impugned order dated 13.05.2019 and Annexure-A of the appeal are incomplete which may be completed.
- ② Copy of departmental appeal against the impugned order is not attached with the appeal which may be placed on it.
- 3- Necessary party may be made in the heading of the appeal.

No. 1132 /S.T.

Dt. 30/6 /2021

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Irfan Ali Yousafzai Adv. Pesh.

Respected Sir

removal of objections.

- ① This will be provided at the time of hearing as the department are not willing to provide in said order.
- ② Copy of the departmental appeal is annexed as "C" page 2 of my petition.
- ③ The same party is necessary as mentioned in the petition.

It is requested that my Petition Appeal may kindly be fixed before the Court.

Dated

09-7-2021

Irfan Ali Yousafzai  
Advocate

objections No. 1 & 2 still stand.  
The appeal is again returned to the counsel  
for the appellant for completion and  
re-submission within 10 days.

No 1245/SIT  
dated 13/07/21

~~13/07/2021~~  
13/7/2021

Respected Sir,

The departmental appeal is  
annexed as annexure - C  
and the objection No-2 is  
pertain to the reply of the  
respondents.

humbly stated that the  
case may be fixed before  
the court.

Advocate  
D. S. Jaisankar  
D. S. Jaisankar  
Advocate

27-07-2021

objections 1 & 2 are still stand. The appeal  
is again returned to the counsel for the appellant  
for completion & re-submission within 15 days.

No 1430/SIT  
Dated 29/07/2021

~~29/07/2021~~  
29/7/2021

Re-submitted.

Respected Sir-

The objection is removed Please

Place before the court.

6-8-2021



**BEFORE THE KHYBER PAKHUNTKHWA SERVICES**  
**TRIBUNAL PESHAWAR**

Service Appeal No. \_\_\_\_\_/2021

Sami Ul Haq.....**Appellant**

**V E R S U S**

Govt of KPK and others .....**Respondents**

**I N D E X**

S.No	Description of Documents	Annex	Pages
1.	Memo of Appeal	*	1-5
2.	Affidavit	*	6
3.	Addresses of Parties	*	7
4.	Copy of order dated 11/08/2017	A	8-10
5.	Copy of eligibility documents along with B-ed Degree	B	11-20
6.	Copies of appeal and notification dated 25/08/2017	C	21-22
7.	Copy of order dated 10/05/2019	D	23-24
8.	Wakalat Nama	*	25

Dated:-29/06/2021

Appellant

Through:-

**Irfan Ali Yousafzai**  
Advocates High Court,  
Peshawar  
Cell 0314-9070658





**BEFORE THE KHYBER PAKHUNTKHWA SERVICES**  
**TRIBUNAL PESHAWAR**

Khyber Pakhtunkhwa  
Service Tribunal

Service Appeal No. 2206 /2021

Diary No. 6686

Dated 29-6-2021

Sami Ul Haq S/o Muhammad Khan R/o Mohallah Shehbaz Khel, Takkar, Tehsil Takht Bhai, District Mardan Presently serving as SST at Govt. Higher Secondary School, Pir Abad, Tehsil Takht Bhai, District Mardan.....**Appellant**

**V E R S U S**

1. District Education Officer (Male) Mardan.
2. District Account Officer, Mardan
3. Assistant Director Establishment, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.....**Respondents**

**SERVICE APPEAL UNDER SECTION 4 OF**  
**THE KHYBER PAKHTUNKHWA SERVICE**  
**TRIBUNAL ACT, 1974 AGAINST THE**  
**ORDER OF RESPONDENT NO.1 DATED**  
**13/05/2019 VIDE WHICH the appellant**  
**was promoted to the post of SST BPS-16**  
**and appellant was ignore from**  
**promotion in the year 2017 and junior**  
**from the appellant was promoted on**  
**11/08/2017 which act of the**  
**respondent is illegal and unlawful the**  
**appellant entitled for promotion from**  
**the year 2017 with all back benefits**

Filed to-day

Registrar

29/6/2021

Re-submitted to-day  
and filed.

Registrar  
Mardan

(2)

**Prayer in Appeal:**

On acceptance of this appeal, the impugned order dated 13/05/2019 may kindly be set aside and the appellant may kindly be promoted to BPS-16 from 11/08/2017 with all back benefits.

**Respectfully Sheweth:**

1. That the appellant is permanent resident of address is given in the heading of the appeal and is performing his duty as SST in the Mardan.
2. That the appellant was appointed as PST on 15/05/1989 in the respondent department and performed his duty for a long period of 32 year in District Mardan with full zeal and zeest, with full devotion without nay complaint from his high ups.
3. That in the year 2017, the petitioner was eligible and entitled for the promotion on the post of PST BPS-16, but the respondents ignored the appellant and promoted his junior colleague in BPS-16 vide order dated 11/08/2017. **(Copy of order dated 11/08/2017 is attached as Annexure-A)**
4. That the respondent department objected the eligibility of the appellant just for the verification

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of the B.ed transcript or degree which was duly verified by the appellant from the concerned university, but the respondents intentionally ignored this very aspect of the case. **(Copy of eligibility documents along with B-ed Degree are attached as Annexure-B)**

5. That the appellant aggrieved from the order dated 11/08/2017 and act of the respondents, filed departmental appeal before the respondent No.3, which was rejected. **(Copies of appeal and notification dated 25/08/2017 are attached as Annexure-C)**

6. That on 13/05/2019, the respondents promoted the appellant on the Post of PST BPS-16 instead of 11/08/2017 and exclude the 2 years from the promotion of the appellant, which act of the respondents is illegal and unlawful. **(Copy of order dated 13/05/2019 is attached as Annexure-D)**

7. That the appellant is aggrieved from the said order and act of the respondents, prefer this service appeal before this Hon'ble Tribunal on the following amongst other grounds:

**GROUND S:**

A. That the impugned acts of the respondents are against the law, rules and policy on the subject

as well as Rules, hence the petitioner liable to be promoted from the date of 11/08/2017 not from the date of 13/05/2019.

- B. That the respondents have committed serious illegalities and irregularities while ignoring the appellant's 2 and half years of promotion as no cogent reason is mentioned while promoting on 13/05/2019 instead of 11/08/2017, hence the impugned order is illegal, unlawful, void-ab-initio as well as corum-non-judice.
- C. That the impugned acts of the respondents are against the principle of natural justice and as no chance of personal hearing is given to the appellant.
- D. That the impugned acts of the respondents are even against the Constitution of Islamic Republic of Pakistan 1973 as well as principle of policy, hence the same are liable to be set aside.
- E. That the appellant is treated against the law, rather discriminately been treated and with malafide, hence the impugned act and order are liable to be set aside.
- F. That acts of the respondents also against the fundamental rights of the appellant which

guaranteed by the Constitution of Islamic Republic of Pakistan 1973.

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

**For the aforesaid reasons, it is, therefore, humbly prayed that by accepting of this service appeal, the impugned order dated 12/05/2019 may kindly be set aside and the appellant may kindly be promoted to BPS-16 from 11/08/2017 with all back benefits.**

**OR**

**Any other remedy deems proper and just may also be granted in the circumstances of the case.**

Dated:-29/06/2021

Through:-

Appellant



**Irfan Ali Yousafzai**  
Advocates High Court,  
Peshawar



**CERTIFICATE:**

Certified on instructions of my client that appellant has not previously moved such like appeal before this Hon'ble Tribunal.

**ADVOCATE**



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**BEFORE THE KHYBER PAKHUNTKHWA SERVICES  
TRIBUNAL PESHAWAR**

Service Appeal No. \_\_\_\_\_/2021

Sami Ul Haq.....**Appellant**

**V E R S U S**

Govt of KPK and others .....**Respondents**

**AFFIDAVIT**

I, **Sami Ul Haq S/o Muhammad Khan R/o Mohallah Shehbaz Khel, Takkar, Tehsil Takht Bhai, District Mardan Presently serving as SST at Govt. Higher Secondary School, Pir Abad, Tehsil Takht Bhai, District Mardan**, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

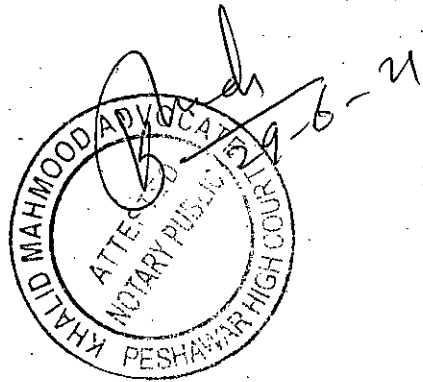
Identified by

**DEPONENT**

CNIC:16102-8238326-1

Cell: 0314-9070658

*Irfan Ali Yousafzai*  
**Irfan Ali Yousafzai**  
Advocate, High Court,  
Peshawar



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**BEFORE THE KHYBER PAKHUNTKHWA SERVICES**  
**TRIBUNAL PESHAWAR**

Service Appeal No. \_\_\_\_\_/2021

Sami Ul Haq.....**Appellant**

**V E R S U S**

Govt of KPK and others .....**Respondents**

**ADDRESSES OF PARTIES**

**APPELLANT**

Sami Ul Haq S/o Muhammad Khan R/o Mohallah Shehbaz Khel, Takkar, Tehsil Takht Bhai, District Mardan Presently serving as SST at Govt. Higher Secondary School, Pir Abad, Tehsil Takht Bhai, District Mardan.


**RESPONDENTS**

1. District Education Officer (Male) Mardan.
2. District Account Officer, Mardan
3. Assistant Director Establishment, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar

Dated:-29/06/2021

Appellant 

Through:-

  
**Irfan Ali Yousafzai**  
Advocates High Court,  
Peshawar

31	304	Sardar Hussain	GHS Kot Takht Bhai	03-03-68	GHS Kot Takht Bhai	A.V.P.
32	308	Habib Ullah	GHS No.1 Mardan	01-04-67	GMS New Surkh Dheri	A.V.P.

**2- PROMOTION OF PSHT/SPST/PST TO SST (General) BPS-16**

S.No	S.L.No	Name of Official	Present Place	Date of Birth	Where Adjsuted	Remarks
1	3	Abdul Malik	GPS Qutab Garh	06-03-64	GHS Jalala	A.V.P.
2	5	Fazli Raziq	GPS Mazdoor Abad	15-04-64	GHS Mazdoor Abad	A.V.P.
3	6	Bakht Taj Khan	GPS Julif Abad	25-05-66	GHS Dakko Baba	A.V.P.
4	7	Muhammad Nawaz Khan	GPS Qandaro Killi	08-04-67	GHS Jalala	A.V.P.
5	18	Aziz Ullah	GPS Hassan Abad	15-05-59	GMS Shah Killi	A.V.P.
6	41	Khan Sher	GPS Zar Khatib Banda	15-04-61	GHS Khan Abad	A.V.P.
7	42	Said Umar	GPS No.1 Gharib Abad	30-12-61	GHS Kohi Bannol	A.V.P.
8	43	Irshad Hussain	GPS Qamar Abad	01-04-62	GHS Nawa Killi	A.V.P.
9	44	Rahim Khan	GPS Jan Abad	18-04-65	GHS Faran Koroon	A.V.P.
10	45	Bakht Amin	GPS Raulul Killi	04-08-67	GHS Jeewar	A.V.P.
11	46	Mumtaz Ali	GPS Shurif Abad	11-02-70	GHS Khan Pur	A.V.P.
12	47	Siraj Ul Haq	GPS Landi Shah	31-08-70	GHS Badar Banda	A.V.P.
13	48	Azmat Ullah	GPS Shah Sar Dheri	01-08-71	GHS Babuzai Katlang	A.V.P.
14	49	Anwar Khan	GPS Msiri Banda	06-11-71	GHS Pir Abad	A.V.P.

**3- PROMOTION OF SDM/DM TO SST (General) BPS-16**

S.No	S.L.No	Name of Official	Present Place	Date of Birth	Where Adjsuted	Remarks
1	41	Qaisar Khan	GHS Jalala	15-04-68	GMS Anwar Khan Killi	A.V.P.
2	50	Himayat Ullah	GHS Kandar Mardan	01-05-69	GHS Garhi Kapura	A.V.P.
3	62	Riaz Ali	GHS Bakhsali	20-01-69	GHS Cham Dheri	A.V.P.

**4- PROMOTION OF SA/TAT TO SST (General) BPS-16**

S.No	S.L.No	Name of Official	Present Place	Date of Birth	Where Adjsuted	Remarks
1	72	Kiramat Ullah	GHS Nasser Killi	02-04-67	GHS Sikandari	A.V.P.
2	74	Mohib Ullah	GHS Gujarat	05-03-69	GHS Rustam	A.V.P.
3	76	Zia Ur Rahmana	GHS Hoti Landaki	13-02-68	GHS Guli Bagh Mardan	A.V.P.

**5- PROMOTION OF ST/T/T TO SST (General) BPS-16**

S.No	S.L.No	Name of Official	Present Place	Date of Birth	Where Adjsuted	Remarks
1	85	Inayat Ullah	GHS Tambulak	05-06-65	GHS Guli Bagh Mardan	A.V.P.

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Advocate



Revised.

SSTs (M) Mardan 5

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42	Said Umar	GPS No.1 Gharib Abad	30/12/1961	01/03/1990	B.A/B.Ed	-----do-----
43	Irshad Hussain	GPS Qamar Abad	01/04/1962	01/03/1990	B.A/B.Ed	-----do-----
44	Rahim Khan	GPS Jan Abad.	18/04/1965	01/03/1990	B.A/B.Ed	-----do-----
45	Bakht Amin	GPS Raidul Killi	04/08/1967	01/03/1990	B.A/B.Ed	-----do-----
46	Mumtaz Ali	GPS Sharif Abad	11/02/1970	01/03/1990	B.A/B.Ed	-----do-----
47	Siraj Ul Haq	GPS Landi Shah	31/08/1970	01/03/1990	B.A/B.Ed	-----do-----
48	Azmat Ullah	GPS Shah Sar Dheri	01/08/1971	01/03/1990	B.A/B.Ed	-----do-----
49	Anwar Khan	GPS Misri Banda	6/11/1971	1/3/1990	B.A/B.Ed	-----do-----

**3. PROMOTION OF SDM/DM TO SST (General) BPS-16.**

Total No. of vacant post of SSTs (General)	79
25% share initial recruitment	20
75% share for Promotion.	59
4 % Share of promotion of SDM/DM	03
Posts available for promotion	03
Promoted to the post of SST General through this order	03

S. No.	Sen; No.	Name Of Teacher	D/O Birth	Place Of Duty	D/O Apptt; As Dm	Qualific Ation	Remarks
1.	44	Qaisar Khan	15.04.1968	GHS Jalala Mardan.	06.03.1990	BA.B.Ed	Services placed at the disposal of DEO (M) Mardan for further posting against SST (General) post.
2.	50	Himayat Ullah	01.05.1969	GHS Kandar Mardan.	06.12.1990	BA.B.Ed	-----do-----
3.	52	Riaz Ali	20.01.1969	GHS Bakhshali	19.12.1990	BA.B.Ed	-----do-----

**4. PROMOTION OF SAT/AT TO SST (General) BPS-16**

Total No. of vacant post of SSTs (General)	79
25% share initial recruitment	20
75% share for Promotion.	59
4 % Share of promotion of SAT/AT	03
Posts available for promotion	03
Promoted to the post of SST General through this order	03

S. No	S.L No	NAME	Place of Duty	D.O.B	D.O. STAPP:	Qualifica tion	Remarks
1	72	Kiramat ullah	GHSS Naseer Killi	02-04-1967	30-09-1993	BA/B.Ed	Services placed at the disposal of DEO (M) Mardan for further posting against SST (General) post.
2	74	Mohib Ullah	GHS Gujarat	05-03-1969	01-11-1994	BA/B.Ed	-----do-----
3	76	Zia Ur Rahman	GHS Hoti Landaki	13-02-1968	08-11-1994	BA/B.Ed	-----do-----

**5. PROMOTION OF STT/TT TO SST (General) BPS-16**

Total No. of vacant post of SST (General)	79
25% share initial recruitment	20
75% share for Promotion.	59
4 % Share of promotion of STT/TT	03
Posts available for promotion	03
Promoted to the post of SST General through this order	03

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ADDITIONAL

2	86	Syed Asif Udd Din	GHS Garyala	02-01-71	GHS Surkhabi	A.V.P.
3	87	Ghulam Ullah	GHS Kata Khat	15-03-76	GHS Mala Dheri	A.V.P.

## 6- PROMOTION OF S.Qari/Qari TO SST (General) BPS-16

S.No	S.L.No	Name of Official	Present Place	Date of Birth	Where Adjsuted	Remarks
1	40	Irfan Ullh	GHS Garhi Kapura	04-01-65	GHSS No.4 Mardan	A.V.P.

**Terms and conditions:-**

- 1 They would be on probation for a period one year extendable for an other one year.
- 2 They would be governed by such rules and regulation as may be issued fromn time to time by the Govt.
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules from time to time.
- 4 Ccharge report should be submitted to all concerned.
- 5 Their Inter-Se-seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining his duty.
- 7 They will give an under taking to be recorded in their service book to the effect that if any overpayment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.
- 8 Their posting will be made on school based, they will have to serve at the place of posting, in their service is not transferable to any other station.
- 9 Before handing over charge once again their documents may be checked if they have not the required relevent qualification as per rules, they may not be handed over charge of the post.

(IJAZ ALI KHAN)  
DISTRICT EDUCATION OFFICER  
(MALE) MARDAN

Endst.No. 578014 /Promotion to SST Post

Dated 11-8-2017.

Copy forwarded for information and necessary action to the:-

- 1 Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2 All the Principal/Headmaster concerned.
- 3 Distriet Accounts Officer Mardan.
- 4 Budget & Account Officer, Local Office.
- 5 Official Concerned.

DISTRICT EDUCATION OFFICER  
(MALE) MARDAN

**ATTESTED**  
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Advocate

"B"

(11)

# BIO-DATA

Name: SAMIUL HAQ

Father's Name: MOHAMMAD KHAN

Post: PST School: GPS MALKIAND TORADHER

Academic Qualification: M.A.

In Case of B.Sc (Subjects): \_\_\_\_\_

Division in BA/B.Sc: 3rd Note:

Professional Qualification (Training Received): \_\_\_\_\_

*Verified B.Ed  
transcript / Degree  
not yet provided  
12/17*

Serial No	Description	Institute	Period
1.	PTC	ALAMA IQBAL	15-05-1987
2	B.Ed.	AIOU Islamabad	17-01-2017

Date of Birth: 05-05-1966

Date of First joining the service and the post joined: 19/05/1987 Post: PST

### Record of Appointment:-

Post held	BPS	Whether on regular/adhoc basis	Period	
			From	To
PST	07	Regular	19-05-1987	01-12-2012
SPST	15	Regular	12-02-2013	

Total Service 30 years, 9 months, 13 days      Years: 30      Months: 09      Days: 13

Total Service on the present post: \_\_\_\_\_

Detail of Non Qualifying Service (if any): \_\_\_\_\_

Signature: \_\_\_\_\_

Assistant Sub-Divisional Education Officer (Male) Primary  
ADG/Principal / Headmaster Education Office (M) P. Circle Takkai

*[Signature]*  
Sub-Divisional Education Officer (Male) Primary Takht Bhai

Transmitted by DFO

\_\_\_\_\_

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(CONFIDENTIAL REPORT)  
CONFIDENTIAL REPORT OF THE YEAR ENDING 31<sup>ST</sup> DECEMBER 2012

1. Name ..... SAMIUL HAD
2. Father's Name ..... MOHAMMAD KHAN
3. Date of Birth ..... 05-05-1966
4. Name of Service ..... P.S.T.
5. Qualification ..... M.A. B.Ed.
6. Total Service on 31<sup>st</sup> December: (2012) 25 years, 7 months, 12 days
7. Scale of Pay and present pay: APS-12 Rs (15500)
8. Various posts held during the year with period: NILL
9. Period of Report: 01-01-2012 to 31-12-2012
10. Result M.S.E. ....
11. Result of S.S.C. Annual: 10-August 1983

Signature: [Signature]

Particulars Remarks on:-

1. Judgment and sense of proportion: Very Good
2. Initiative and drive: Good
3. Technical knowledge and application: Very Good
4. Supervision and control over students: Very Good
5. Integrity: Good
6. Co-operation with staff: Good
7. Relation with public: Good
8. Suitability for promotion: Fit for promotion on his turn
9. Knowledge of language: English, Urdu and pashto

General Remarks:- He is regular and punctual.

Name (in block letters) and Designation of the Reporting Officer (with seal)

General Remarks by High Officer

[Signature]  
[Signature]  
[Signature]  
 Assistant Sub Dir:  
 Education (Pry) (W)  
 Pry: Circle Takhtai

Sub Divisional Education  
 Office (Male) Primary  
 Takht Bhai

**ATTESTED**  
[Signature]  
 to be true copy  
 Advocate

(CONFIDENTIAL REPORT)

CONFIDENTIAL REPORT OF THE YEAR ENDING 31<sup>ST</sup> DECEMBER 2013

- 1. Name ..... SAMIUL HAQ
- 2. Father's Name ..... MOHAMMAD KHAN
- 3. Date of Birth ..... 05-05-1966
- 4. Name of Service ..... SPST
- 5. Qualification ..... M.A. B.Ed
- 6. Total Service on 31<sup>st</sup> December (2013) 26 years, 7 months, 12 days
- 7. Scale of Pay and present pay: Rps 15, Rps (16540)
- 8. Various posts held during the year with period: Nil
- 9. Period of Report: 01-01-2013 to 31-12-2013
- 10. Result M.S.E. ....
- 11. Result of S.S.C. Annual: 10 August 1983

Signature: *[Signature]*

Particulars Remarks on:-

- 1. Judgment and sense of proportion: very Good
- 2. Initiative and drive: Good
- 3. Technical knowledge and application: very Good
- 4. Supervision and control over students: very Good
- 5. Integrity: Good
- 6. Co-operation with staff: Good
- 7. Relation with public: Good
- 8. Suitability for promotion: Fit for promotion on his terms
- 9. Knowledge of language: English, Urdu and Pashto

General Remarks: He is dutiful and honest

Name (in block letters) and Designation of the Reporting Officer (with seal)

General Remarks by High Officer:

*[Signature]*  
Sub Divisional Education Officer (Male) Primary Education, Takkhal Bhal Fry Circle Takkhal

**ATTESTED**  
*[Signature]*  
to be true copy  
Advocate

(CONFIDENTIAL REPORT)

CONFIDENTIAL REPORT OF THE YEAR ENDING 31<sup>ST</sup> DECEMBER 2014

- 1. Name ..... SAMIUL HAQ
- 2. Father's Name ..... MOHAMMAD KHAN
- 3. Date of Birth ..... 05-05-1966
- 4. Name of Service ..... S.P.S.T.
- 5. Qualification ..... M.A. B.Ed.
- 6. Total Service on 31<sup>st</sup> December. (2014) 27 years, 7 months, 12 days
- 7. Scale of Pay and present pay: APS 15, Rs (19005)
- 8. Various posts held during the year with period: Nil
- 9. Period of Report: 01-01-2014 to 31-12-2014
- 10. Result M.S.E. ....
- 11. Result of S.S.C. Annual: 10 August 1983

Signature: [Signature]

Particulars Remarks on:-

- 1. Judgment and sense of proportion: Very Good
- 2. Initiative and drive: Good
- 3. Technical knowledge and application: Very Good
- 4. Supervision and control over students: Very Good
- 5. Integrity: Good
- 6. Co-operation with staff: Good
- 7. Relation with public: Good
- 8. Suitability for promotion: Fit for promotion on his turn
- 9. Knowledge of language: English, Urdu and Pashto

General Remarks:- He is Co-operative with students.

Name (in block letters) and Designation of the Reporting Officer (with seal)

General Remarks by High Officer

[Signature]

[Signature]  
Assistant Sub Div:  
Education Officer (M)  
Taky: Circle Takhat

Sub Divisional Education  
Officer (Male) Primary  
Takhat Bher

**ATTESTED**  
[Signature]  
to be true copy  
Advocate

(CONFIDENTIAL REPORT)  
CONFIDENTIAL REPORT OF THE YEAR ENDING 31<sup>ST</sup> DECEMBER 2015

1. Name ..... SAMIUL HAQ
2. Father's Name ..... MOHAMMAD KHAN
3. Date of Birth ..... 05-05-1966
4. Name of Service ..... SPST
5. Qualification ..... M.A. B.Ed.
6. Total Service on 31<sup>st</sup> December: (2015) 28 years, 7 Months, 12 days
7. Scale of Pay and present pay: PPS 15 Rs (25485)
8. Various posts held during the year with period: NILL
9. Period of Report: 01-01-2015 to 31-12-2015
10. Result M.S.E. ....
11. Result of S.S.C. Annual: 10 August 1983

Signature: [Signature]

Particulars Remarks on:-

1. Judgment and sense of proportion: Very Good
2. Initiative and drive: Good
3. Technical knowledge and application: Very Good
4. Supervision and control over students: Very Good
5. Integrity: Good
6. Co-operation with staff: Good
7. Relation with public: Good
8. Suitability for promotion: Fit for promotion on his turn
9. Knowledge of language: English, Urdu and Pashto

General Remarks:- He is honest and regular.

Name (in block letters) and Designation of the Reporting Officer (with seal)

General Remarks by High Officer:

[Signature] with  
[Signature] here  
 Assistant Sub Div:  
 Education (Male) (P)  
 P/o: Circle Takht  
 Sub Divisional Education  
 Officer (Male) Primary  
 Takht Bhai

**ATTESTED**  
to be true copy  
Advocate

PROPSIS IN R/o: SAMIUL HAQ

NAME OF SCHOOL: GPS MALKIAND TORDHER

Year	General Remarks	Pen Picture	Adverse	Conveyed	Expunged
2012	He is regular and punctual.				
2013	He is dutiful and honest.				
2014	He is Co-operative with students.				
2015	He is honest and regular.				
2016	He is hardworking and regular.				

Hdhr

Assistant Sub Div  
Education Officer  
Takkai

*[Signature]*  
Principal  
Sub Divisional Education  
Officer (Male) Primary  
Takkai Bhai

**ATTESTED**  
*[Signature]*  
to be true copy  
Advocate



PROPSIS IN R/O: SAMIUL HAQ

NAME OF SCHOOL: GPS MALKIAND TORDHER

Year	General Remarks	Pen Picture	Adverse	Conveyed	Expunged
2012	He is regular and punctual.				
2013	He is dutiful and honest.				
2014	He is co-operative with students.				
2015	He is honest and regular.				
2016	He is hardworking and regular.				

*Handwritten signature*

Principal/H.M/H.Mistress

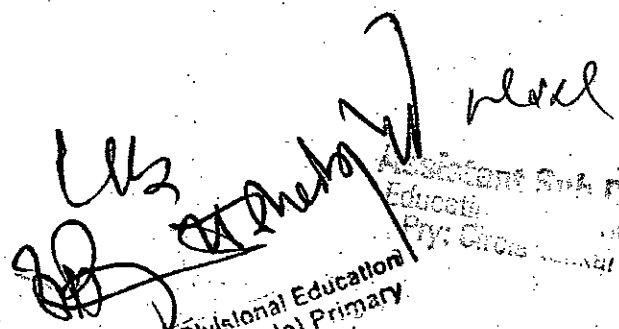
**ATTESTED**  
*Handwritten signature*  
To be true copy  
Advocate

# LAST THREE YEAR'S RESULT

RESPECT OF MR/MISS: SAMIUL HAQ

SCHOOL: GPS MALKIANG TORHER

YEAR	SUBJECTS	CLASS	RESULT IN PERCENTAGE	REMARKS
2014	MATHS, English	5th	48%	Good
	English, MATHS	2nd	45%	Good
	English	1st	50%	Good
2015	English, Urdu	4th	45%	'
	English, maths	2nd	50%	good
	All subjects	1st	49%	'
2016	English, maths	2nd	45%	Good
	Urdu, Islamiyat	3rd	48%	'
	ALL subjects	1st	50%	Good

  
 Principal

Sub Divisional Education  
 Officer (Male) Primary  
 Takht Bhai

PRINCIPAL/H.M/ H.MISTRESS

**ATTESTED**  
  
 to be true copy  
 Advocate

# NON-INVOLVEMENT CERTIFICATE

By that Mr/M/sss: SAMIUL HAQ  
 son of MOHAMMAD KHAN  
G.P.S. MALKIAND TORDHER  
 working against SPHT Post.

not been involved in any criminal / Corruption or Departmental Case.  
 has a Spotless Character. *except departmental enquiry*

*Wd*  
 Assistant Sub-Divisional Education Officer (Principal) / H.M/ H. Mistress:  
 Pny: Circle Takka

*As given by the  
 ASD/CC.*

*CS*  
*11/07/08*

Sub Divisional Education Officer (Male) Primary  
 Takht Bhai

**ATTESTED**  
*[Signature]*  
 to be true copy  
 Advocate

Allama Iqbal Open University (20)  
Islamabad



Serial No. A039286

Certified that Mr. / Ms. SAMI-UL-HAQ

Son / Daughter of MASTER MUHAMMAD KHAN

Registration No: 88NMN0179 Roll No: BE615430

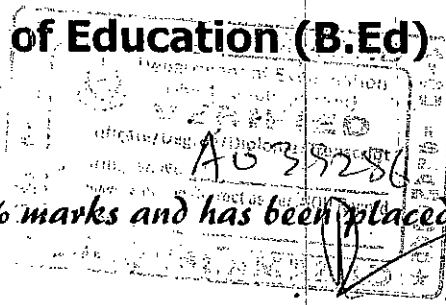
having completed the prescribed requirements in semester

SPRING 2016

is awarded the degree of:

**Bachelor of Education (B.Ed)**

He / She has secured 63 % marks and has been placed in B grade.



*Muhammad*

CONTROLLER OF EXAMINATIONS

Result declared on: January 17, 2017

Date of Issue: April 12, 2019



VICE-CHANCELLOR

**ATTESTED**

to be true copy  
Advocate

THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT, ISSUED SEPARATELY



**ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD**  
**DEPARTMENT OF EXAMINATIONS**  
**(Verification Section)**

Confidential

20A

No. F. 1-5/Veri/105850  
SUB DIVISIONAL EDUCATION OFFICER  
MALE TAKHT BHAI MARDAN.

Dated: 15 Jul, 2017

Subject: **VERIFICATION OF CERTIFICATE(S)/DEGREE(S)/DIPLOMA(S)/TRANSCRIPT/  
PRC ISSUED BY ALLAMA IQBAL OPEN UNIVERSITY**

Dear Sir/Madam,

This is with reference to your Letter No. 6575 dated 25 Mar, 17  
It is certified that Certificate(s)/Degree(s)/Diploma(s)/Transcript/PRC issued by the University to the following students are correct as per our record:

Sr. No.	Student & Father's Name	Programme	Registration No.	Certificate/Degree/ Diploma/Transcript/ PRC No.
1	SAMIUL HAQ MASTER MUHAMMAD KHAN	B.ED	88-NMN-0179	831075

Assistant Controller of Examinations  
Verification Section  
Allama Iqbal Open University  
Islamabad

17/7/2017

**ATTESTED**

to be true copy  
Advocate

محفوظ جناب پرنسپل ڈائریکٹر آف ایجوکیشن لاہور جسٹس ٹیوٹوریل

جناب عالی

SST لکھنے میں شمولیت کے درخواست

ADD  
10/16/8

موردانہ گزارش محو افسر کی جانب سے۔ کہ بندہ 19-5-1987 سے محو تعلیم میں (PST) پوسٹ پر خدمات انجام دے رہا ہے۔ بندہ نے علامہ اقبال ایڈمنسٹریٹو کالج اسلام آباد سے B.Ed کا امتحان سینئر ڈیویژن میں پاس کیا ہے۔ اس لیے آپ صاحبان کی خدمت میں اپنا نام سے کہ بندہ کا نام SST پروفیشن لکھنے میں شامل کرنے کے احکام جاری کرنے سے مستور فرمائیں۔  
نوٹ SST پروفیشن سے دوبارہ فرم بھیجے

عین گزارش ہوئی

ATTESTED  
15/10/87  
ADMISSION

الغرض

سب سے اچھی PST ڈائریکٹر پرنسپل ٹیوٹوریل  
تعمیرات کے لئے فرم

دستخط

0313-9798523

HEAD TEACHER  
G.P.S. Wazirpur  
Teh: Jalandhar

کے لئے

16/9/87

DD(M)

1080/19

794

16/8

اپنے

B! R (29) C1

Directorate of Elementary & Secy: Education  
Khyber Pakhtunkhwa, Peshawar  
No. 5286/F.No.02/Promotion of Teachers (DPC)  
/7-10-2017 (Male) KP  
Dated Peshawar the 25/8/2017

To

The District Education Officer  
(Male) Mardan.

Subject: - **APPEAL FOR DEPARTMENTAL PROMOTION TO SST (GENERAL)  
POST (BPS-16).**

Memo:

I am directed to refer to enclose here with a copy of appeal along with other relevant documents in respect of Mr. Sami Ul-Haq PSHT GPS, Malkayano (Tordher) District Mardan on the subject cited above for your perusal and further necessary action as per rules/policy.

*M. J. 28/8/17*  
Assistant Director (Estab)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

Endst: No. \_\_\_\_\_

Copy of the above is to:-

1. PA to Director (E&SE) Local Directorate.

*M. J. 25/8/17*  
Assistant Director (Estab)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

**ATTESTED**

*[Signature]*  
to be true copy  
Advocate







SSTs (M) Mardan

**Directorate of Elementary and Secondary Education**

D

23

## Notification

To be substituted with the same No. and date.

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(PE)/4-5/SSRC/ Meeting/ 2013/ Teaching Cadre dated 24<sup>th</sup> July, 2014, the following PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (General) noted against each BPS-16 (Rs. 18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted by the District Education Officer concerned.

### A. SST (General)

#### 1. PROMOTION OF PSHT/SPST/PST TO SST (General) BPS-16

Total No. of vacant Posts of SST (General)	44
25% share initial recruitment	11
75% share for Promotion.	33
20 % Share of promotion of PSHT/SPST/PST	09
No of PSHTs already promoted to SST (Gen)	05
Posts available for promotion	04
Proposed for Promotion	04
Recommended for promotion	02

S. No.	Sen. No.	Name of Teach	Name of School	Date of Birth	D/O Apptt; as PST	Qualification	Remarks
1	202	Sahmullah	GPS No1 K.O.Zai	08/07/1966	01/09/1985	BA/B.Ed	Services placed at the disposal of DEO (M) Mardan for further posting against SST (General) post.
2	538	Samiul Haq	GPS Malkyano Tordher	05/05/1966	15/05/1989	BA/B.Ed	-----do-----

#### Terms and conditions:-

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded with the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining his duty.

**ATTESTED**

Copy  
Adviser

**BETTER COPY OF THE PAGE NO.**  
**Directorate of Elementary and Secondary Education**

23A

**NOTIFICATION**

**To be substituted with the same No. and date.**

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber pakhtunkhwa Elementary & Secondary Education Notification No. SO(PE)/4-5/SSRC/Meeting/2013/ Teaching Cadre dated 24<sup>th</sup> July, 2014, the following PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (General) noted against each BPS-16 (Rs. 18910-1520-64510) plus usual allowances as admissible under the rules on regular basic under the existing policy of the Provincial Government, on the terms and conditions given below with immediate effect and further they will be posted by the District Education Officer concerned.

A. SST(General)

1. Promotion of PSHT/SPST/PST to SST (General) BPS-16

Total No. of vacant posts of SST (General)	44
25% share initial recruitment	11
75% share of promotion	33
20 % share of promotion of PSHT/SPST/ PST	09
No of PSHTs already promoted to SST (Gen)	05
Posts available for promotion	04
Proposed for promotion	04
Recommended for promotion	02

S. No.	Sen No.	Name of Teacher	Name of School	Date of Birth	D/O Apptt: as PST	Qualification	Remarks
1	202	Salim Ullah	GPS No. K.D Zai	08/07/1966	01/09/1985	BA/ B.Ed	Services place at the disposal of DEO (M) Mardan for further posting against SST (General ) Post.
2	538	Shami Ul Haq	GPS Malkyano Tordher	05/05/1966	15/05/1989	BA/B.Ed	-do-

Terms and conditions

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period in case of misconduct, they shall be preceded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their inter-se seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.

**ATTESTED**  
*[Signature]*  
To be filed copy  
Advocate

10 Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

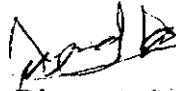
(Hafiz Dr. Muhammad Ibrahim)  
Director  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

(24)

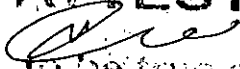
Endst: No. 3570-75 / File No.2/Promotion SST B-16: Dated Peshawar the 13/5 2019

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (M) Mardan.
3. District Accounts Officer Mardan.
4. Official Concerned.
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
7. M/File

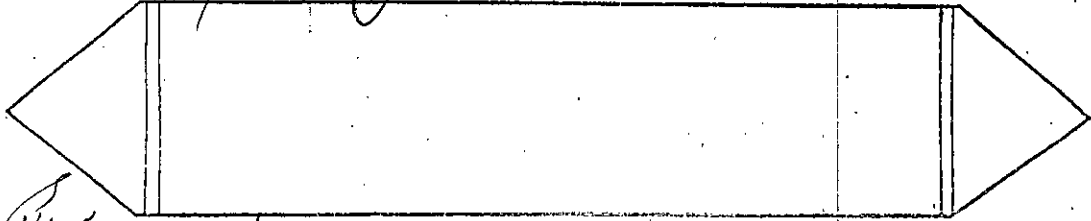
  
Dy: Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

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Advocate

(2)

# بعدالت سروس ٹریبونل رول نمبر



2021ء مجانب سلسلہ  
بنام حکومت

سمیع الحق

سرخند اپیل

موزخہ  
مقدمہ  
دعویٰ  
نیم

## باعث تحریر آئینک

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ  
 آج ان مقام سرخند کیلئے عسکر خان علی یوسفزئی کے نام سے  
 مقررہ کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز  
 وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ بر حلف دینے جواب دہی اور اقبال دعویٰ اور  
 باسورت ڈگری کرنے اجراء اور وصولی چیک دروپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یا ٹریفک یا اپیل کی برادگی اور منسوخی  
 نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
 کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ  
 پر داخلہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائے التوائے مقدمہ کے سبب سے ہوگا۔  
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
 مذکور کریں۔ لہذا وکالت نامہ لکھدیا کہ سندر ہے۔

المترقوم 29 ماہ جون 2021

بہ مقام

لکھنؤ

بہ مقام

bc-09-1766  
mobile#0314-9070658

Accepted  
Accepted  
@delhifield

سمیع الحق  
عسکر خان  
سرخند  
صاحب موصوف  
مقرر شدہ  
وکیل