


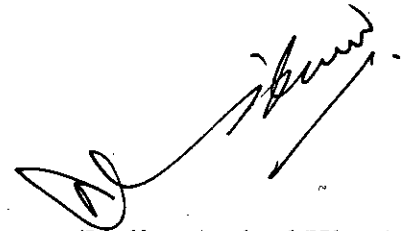
3<sup>rd</sup> Feb, 2023

Nobody present on behalf of the appellant. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

On the previous date notice was directed to be issued to the appellant and his counsel. The office has reported that the counsel was contacted on phone but he had said that the appellant was not in contact with the counsel, therefore, they would not attend the court. Dismissed in default. *Counsel*  
*4*

03. *Pronounced in open court in Peshawar and given under our hands and seal of this Tribunal on this 3<sup>rd</sup> day of February, 2023.*

  
(Muhammad Akbar Khan)  
Member (E)


  
(Kalim Arshad Khan)  
Chairman

SCANNED  
KPST  
Peshawar

11<sup>th</sup> Oct., 2022

Appellant present in person. Mr. Kabirullah Khattak,  
Addl. AG for the respondents present.

Appellant seeks adjournment due to engagement of his  
learned counsel before Hon'ble Peshawar High Court.  
Adjourned. To come up for arguments on 10.11.2022 before  
the D.B.

  
(Fareeha Paul)  
Member (E)

  
(Kalim Arshad Khan)  
Chairman

9.11.2022


Since 9<sup>th</sup> November has been declared as public  
holiday, case is adjourned to 9.12.2022 for the same as  
before.

  
Reader

09<sup>th</sup> Dec. 2022

Nemo for the appellant. Mr. Naseerud Din Shah, Assistant  
Advocate General for official respondents and counsel for  
private respondents present.

Since 9<sup>th</sup> November 2022 was declared as public holiday and  
the date was changed on the note reader, therefore, it is deemed  
appropriate to issue notices to appellant and his learned counsel  
for the next date as last chance. Adjourned to 03.02.2023 for  
arguments before the D.B.

  
(Fareeha Paul)  
Member (E)

  
(Kalim Arshad Khan)  
Chairman

*Counsel asked  
that Appellant didn't  
contact us. therefore we  
cannot fix ed.  
for court  
Prof  
Mohamud  
Zeeshan Sharif*

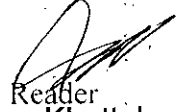
23.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 18.05.2022 for the same as before.


18.05.2022


Nemo for the appellant. Mr. Shahab Khattak Coordinator alongwith Mr. Kabir Ullah Khattak learned Additional Advocate General for respondents present.

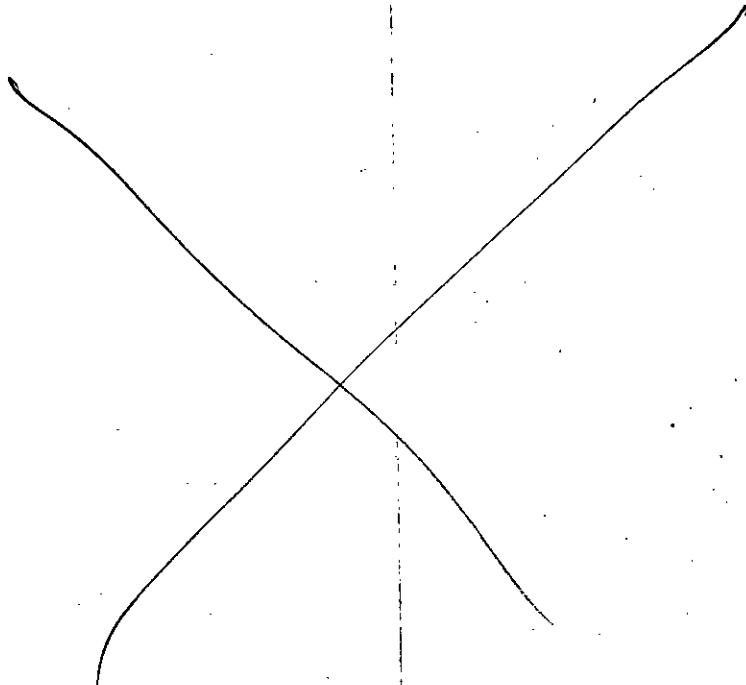
Previous date was changed on a Reader Note, therefore, notice for prosecution of the appeal be issued to appellant and his counsel through registered post and to come up for arguments on 01.07.2022 before D.B.

  
Reader

Noted  
23/6/22

  
(Rozina Rehman)  
Member (J)

  
(Salah-Ud-Din)  
Member (J)



01.07.2022

Bench is not available, therefore, case is adjourned to 11.10.2022 for the same as before.


  
Reader

09.08.2021

Nemo for appellant.

Asif Masood Ali Shah learned Deputy District Attorney alongwith Shahab Khattak Legal Advisor of respondent No.2 present. Counsel for private respondent present.

Preceding date was adjourned on a Reader's note, therefore, appellant/counsel be put on notice for 20.10.2021 for arguments, before D.B.



(Rozina Rehman)  
Member (J)

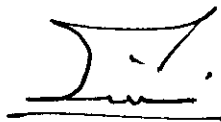


Chairman

20.10.2021

Junior to learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for official respondents and Mr. Taimur Ali Khan, Advocate, for private respondents present.

Junior to learned counsel for the appellant seeks adjournment on the ground that learned senior counsel for the appellant is busy in the august Peshawar High Court, Peshawar. Case to come up for arguments on 23.02.2022 before the D.B.



(Salah-Ud-Din)  
Member (Judicial)

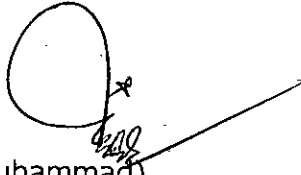


Chairman

02.11.2020

Junior to counsel for the appellant and Addl. AG for the respondents present.

The Bar is observing general strike, therefore, the matter is adjourned to 11.01.2021 for hearing before the D.B.

  
(Mian Muhammad)  
Member

  
Chairman

11.01.2021


Junior to counsel for the appellant and Mr. Kabirullah Khattak learned Addl. AG for respondents present.

Due to COVID-19, the case is adjourned for the same on 15.04.2021 before D.B.

  
READER

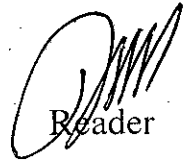
15.04.2021

Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 09.08.2021 for the same as before.

  
Reader

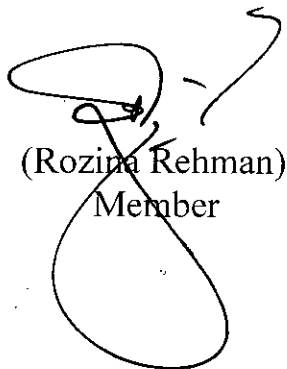
27.03.2020

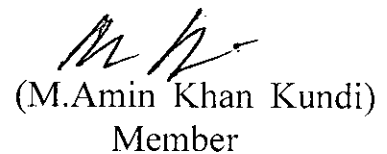
Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 16.06.2020 before D.B.

  
Reader

16.06.2020

Learned counsel for the appellant present. Mr. Riaz Khan Paindakheil learned Assistant Advocate General for official respondents present. Learned counsel for private respondents present. Learned counsel for the appellant requested for adjournment. Official respondents are directed to direct the representative to attend the court. Adjourned. To come up for arguments on 26.08.2020 before D.B. Learned counsel for the appellant is also directed to provide member copy of the present appeal, for the date fixed.

  
(Rozina Rehman)  
Member

  
(M.Amin Khan Kundi)  
Member

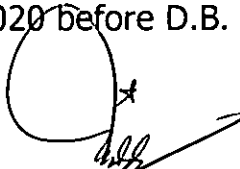
26.08.2020

Due to summer vacation case to come up for the same on 02.11.2020 before D.B.

Reader

17.02.2020

Junior to counsel for the appellant present. Mr. Ziaullah, DDA alongwith Mr. Shahab Khattak, Legal Advisor for official respondents and counsel for private respondent no. 6 and 7 present. Arguments of learned counsel for the appellant already heard. Learned counsel for private respondents no. 6 and 7 stated that his written reply of private respondents be treated as their written arguments and relied upon the same. Mr. Shahab Khattak, Legal Advisor for official respondents seeks adjournment. Learned Deputy District Attorney also made request for time to prepare the brief. Adjourned. To come up for arguments of the respondents on 25.02.2020 before D.B.

  
Member

  
Member

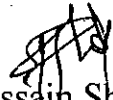
25.02.2020

Appellant absent. Junior to counsel for the appellant present. Mr. Riaz Khan Paindakheil learned Assistant Advocate General present. Shahab Khattak Legal Advisor of official respondents present, stated that in ~~view~~ of the said ~~representations~~, the appellant is no more interested in the present service appeal and to this effect he submitted copy of certificate issued by the appellant. Appellant is not in attendance, as such he be summoned for the next date fixed as 27.03.2020. Adjourn. To come up for further proceedings on the date fixed before D.B.

  
Member

  
Member


19.08.2019 Learned counsel for the appellant present. Mr. Zia Ullah learned Deputy District Attorney for the respondents present. Learned Deputy District Attorney seeks adjournment. Adjourned. To come up for arguments on 30.10.2019 before D.B.


  
(Hussain Shah)  
Member

  
(M. Amin Khan Kundi)  
Member

03.10.2019


Junior to counsel for the appellant and Mr. Riaz Khan Paindakheil learned Assistant Advocate General present. Junior to counsel for the appellant seeks adjournment as senior counsel for the appellant is not in attendance. Being an old case of the year 2014, adjourned by way of last chance. To come up for arguments on 15.10.2019 before D.B.

  
Member

  
Member

15.10.2019

Appellant absent. Learned counsel for the appellant absent. Mr. Usman Ghani learned District Attorney present. Appellant be put to notice. Being an old case, another last opportunity is granted. Adjourn. To come up for arguments on 31.10.2019 before D.B.

  
Member


  
Member



31.10.2019


Appellant absent. Learned counsel for the appellant absent. Junior to counsel for the appellant present. Mr. Usman Ghani learned District Attorney for the official respondents and Mr. Taimour Ali Khan Advocate present on behalf of the private respondents. Junior to counsel for the appellant seeks adjournment as senior counsel for the appellant is not available today. Again last opportunity is granted. Adjourn. To come up for arguments on 11.12.2019 before D.B. Appellant be put to notice for the date fixed.

  
Member

  
Member

11.12.2019

Lawyers are on strike on the call of Khyber Pakhtunkhwa Bar Council. Adjourn. To come up for further proceedings/arguments on 14.02.2020 before D.B.

  
Member

  
Member

14.02.2020

Learned counsel for the appellant present. Mr. Zia Ullah learned Deputy District Attorney present. Arguments of learned counsel for the appellant heard. Learned Deputy District Attorney seeks adjournment to prepare the brief. Adjourn. To come up for arguments of learned DDA on 17.02.2020 before D.B.

  
Member

  
Member

14.11.2018

Due to retirement of Hon'ble Chairman, the Tribunal is defunct. Therefore, the case is adjourned. To come up on 02.01.2019.

  
Reader

02.01.2019

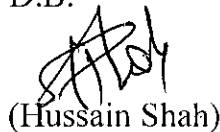
Learned counsel for the appellant present. Mr. Riaz Paindakheil learned Assistant Advocate General for official respondents present. Learned counsel for private respondents also present. Adjournment requested. Adjourn. To come up for arguments on 11.02.2019 before D.B.

  
Member

  
Member

11.02.2019

Counsel for the appellant present. Mr. Ziaullah, Deputy District Attorney for official respondents No. 1 to 4 and counsel for private respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 21.03.2019 for arguments before D.B.

  
(Hussain Shah)

  
(M. Amin Khan Kundi)

21.03.2019

Member for appellant. Addl. AG for the respondents present.


Due to second day of the strike on the call of Bar Council, instant matter is adjourned to 14.05.2019 before the D.B.

Member

Chairman

21.03.2019 Nemo for appellant. Addl. AG for the respondents present.


Due to second day of the strike on the call of Bar Council, instant matter is adjourned to 14.05.2019 before the D.B.

  
Member


  
Chairman

14.05.2019 Counsel for the appellant and Addl. AG for respondents present. Arguments could not be heard due to complete breakdown of electricity. Adjourned to 03.07.2019 for arguments before D.B.

  
(Ahmad Hassan)  
Member

  
(M. Amin Khan Kundi)  
Member

03.07.2019 Junior counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for official respondents No. 1 to 4 present. Junior counsel for the appellant requested for adjournment on the ground that learned senior counsel for the appellant is not available today. Adjourned to 19.08.2019 for arguments before D.B.

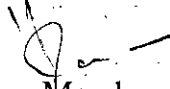
  
(Hussain Shah)  
Member

  
(M. Amin Khan Kundi)  
Member

17.10.2017

Clerk to counsel for the appellant, Addl: AG for official respondents and counsel for private respondents present. Clerk to counsel for the appellant seeks adjournment as counsel for the appellant is not in attendance. Adjourned. To come up for arguments on 26.12.2017 before D.B.

  
Member  
(Executive)

  
Member  
(Judicial)

26.12.2017

Counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Counsel for the appellant seeks adjournment. Granted. To come up for arguments on 16.02.2018 before the D.B.


  
Member

  
Chairman

16.02.2018

Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondents present. Counsel for the appellant seeks adjournment. To come up for arguments on 24.04.2018 before the D.B.

  
Member

  
Chairman

24.04.2018

Counsel for the appellant and Addl:AG for respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 21.06.2018 before D.B.


  
(Ahmad Hassan)  
Member

  
(M. Hamid Mughal)  
Member

21.06.2018

Counsel for the appellant and Adll: AG for respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 07.08 .2018 before D.B.


  
(Ahmad Hassan)  
Member

  
(M. Amin Khan Kundi)  
Member

07.08.2018

Junior to counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney present. Junior to counsel for the appellant requested for adjournment as senior counsel is not in attendance. Adjourned. To come up for arguments on 02.10.2018 before D.B

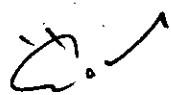
  
(Muhammad Amin Kundi)  
Member

  
(Muhammad Hamid Mughal)  
Member

02.10.2018

Clerk to counsel for appellant and Mr. Muhammad Jan learned Deputy District Attorney present. Clerk to counsel for appellant seeks adjournment as learned counsel for appellant is not in attendance. Adjourn. To come up for arguments on 14.11.2018 before D.B

  
(Hussain Shah)  
Member

  
(Muhammad Hamid Mughal)  
Member

15.12.2016

Mr. Taimur Khan, Advocate for appellant present. Fresh Wakalatnama submitted. Addl. AG for the respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply/comments on 25.01.2017 before S.B.

  
 Chairman

25.01.2017

Clerk to counsel for the appellant and Addl. AG for official respondents present. Written reply submitted by private respondents. Remaining respondents requested for adjournment. Request accepted. Another last opportunity granted. To come up for written reply/comments on 01.03.2017 before S.B.

  
 (MUHAMMAD AAMIR NAZIR)  
 MEMBER


01.03.2017

Clerk to counsel for the appellant and Addl. AG for respondents present. Written reply not submitted despite last opportunities. Requested for further adjournment. Last opportunity further extended subject to payment of cost of Rs. 500/- which shall be borne by respondents from their own pockets. To come up for written reply/comments on 03.04.2017 before S.B.

  
 (MUHAMMAD AAMIR NAZIR)  
 MEMBER


03.04.2017

Counsel for the appellant and Addl. AG for the respondents present. Written reply not submitted despite numerous chances no further opportunities for submission of written reply shall be given to the respondents. The appeal is assigned to D.B for rejoinder and final hearing on 24.05.2017.

  
Chairman

24.05.2017

Agent to counsel for the appellant and Mr. Muhammad Adeel Butt, Additional AG for the respondent present. Agent to counsel for the appellant stated at the bar that the present instant service appeal and other appeal has been fixed on 03.07.2017 and requested that the present service appeal No.1116/14 may also be clubbed. Request accepted. To come up for arguments on 03.07.2017 before D.B.

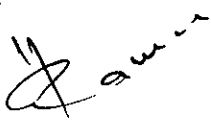
  
(Gul Zeb Khan)  
Member

  
(Muhammad Amin Khan Kundi)  
Member

03.07.2017

Clerk of the counsel for appellant and Mr. Kabir Ullah Khattak, Assistant AG for the respondents present. Clerk of the counsel for appellant submitted rejoinder which is placed on file. To come up for arguments on 17.10.2017 before D.B.

  
(Gul Zeb Khan)  
Member

  
(Muhammad Hamid Mughal)  
Member

02.06.2016

Counsel for the appellant, Addl. AG for the official respondents and Uzma Syed, Advocate for respondents No. 5 present. Wakalatnama submitted. Amended memo. of appeal submitted. Notice of amended appeal be issued to the respondents. To come up for written reply/comments before S.B on 11.08.2016.

  
Chairman

11.08.2016

Clerk to counsel for the appellant and Addl. AG for respondents present. Written reply not submitted. Requested for adjournment. Request accepted. To come up for written reply on 24.10.2016.

  
Member

24.10.2016

Clerk to counsel for the appellant and Addl. AG for respondents present. Written reply not submitted. Requested for adjournment. To come up for written reply/comments on 15.12.2016 before S.B.

  
Chairman



12.11.2015

Counsel for the appellant, Mr. Muhammad Rasool, AD alongwith Addl: A.G for official respondents No. 1 and 2 and private respondents No. 3 and 4 with counsel present. Application for impleadment of necessary party and deleting the unnecessary party submitted, copy whereof supplied to the learned counsel for the appellant. To come up for reply and arguments on the said application on 9.2.2016 before S.B.

  
Chairman

09.02.2016

Agent of counsel for the appellant and Addl: A.G for official respondents present. Requested for adjournment. To come up for reply and arguments on application for impleading petitioner as party on 12.4.2016 before S.B.

  
Chairman

12.04.2016

Counsel for the appellant, Addl. AG for the official respondents and counsel for private respondents No. 3 and 4 present. Reply to application for impleadment of KP Technical Education & Vocational Training Authority, submitted. Arguments on application heard and record perused.

It is an admitted fact that Technical Education Department has been established and re-named as KP Technical Education & Vocational Training Authority as such the application is accepted and Managing Director of the said authority is directed to be implemented as respondent in the penal of respondents. To come up for amended appeal on 02.06.2016.

  
Chairman

11.11.2014

Clerk of counsel for the appellant, Mr. Muhammad Adeel Butt, AAG for official respondents No. 1 and 2 and private respondent No. 3 in person present. The Tribunal is incomplete. To come up for written reply/comments on 26.02.2015.



Reader

26.02.2015

Counsel for the appellant, Addl. A.G for official respondents present and counsel for private respondent No. 3 present. None present for respondent No. 4. Written reply by respondent No. 3 submitted while learned Addl. A.G requested for further time for submission of written reply. Adjourned to 9.6.2015 before S.B.



Chairman

09.06.2015

Agent of counsel for the appellant, Addl. A.G. for official respondents No. 1 <sup>and</sup> 2 and private respondent No. 3 in person present. Written reply on behalf of <sup>official</sup> respondents No. 1 & 2 and private respondent No. 4 not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply on behalf of official respondents No. 1 & 2 and private respondent No. 4 on 25.8.2015 before S.B.



Chairman

25.08.2015

Counsel for the appellant and Addl. A.G for official respondents No. 1 and 2 present. Written reply not submitted despite last opportunity. Requested for further adjournment. Last opportunity is extended for submission of written reply alongwith connected appeal on 12.11.2015 before S.B.



Chairman

Appeal No. 492/2014  
Mr. Zubor-Uol-Dein

3.

12.06.2014

Clerk of counsel for the appellant present and requested for

adjournment. Request accepted. To come up for further preliminary hearing on 11.08.2014.

  
Member

4.

11.08.2014

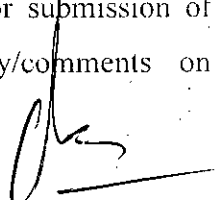
Counsel for the appellant present. Preliminary arguments heard and case file perused. Through the instant appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, the appellant has impugned final seniority list dated <sup>23.04</sup> 07.12.2013 which was received to the appellant on 07.12.2013, whereas <sup>in</sup> the appellant was showing at S.No. 7 while private respondents No. 3 and 4 at S.No. 3 and 5. Against the impugned seniority list appellant filed departmental appeal on 09.12.2013 which was not responded within statutory period of 90 days, hence the instant appeal on 20.03.2014.



Appellant Deposited  
Security & Process Fee  
Rs. 350/- Bank  
Receipt is Attached with File



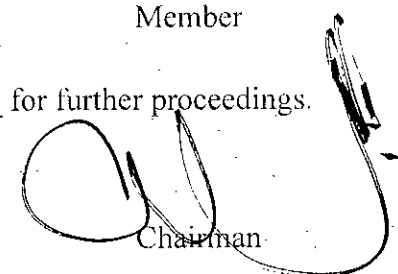
Since the matter pertains to terms and conditions of service of the appellant. The appeal is within time, hence admit for regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notice be issued to the respondents for submission of written reply. To come up for written reply/comments on 11.11.2014.

  
Member

5.

11.08.2014

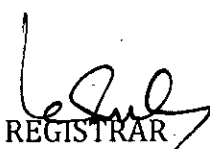

This case be put before the Final Bench I for further proceedings.

  
Chairman

Form- A  
FORM OF ORDER SHEET

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

Case No. 492/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	08/04/2014	The appeal of Mr. Zahoor-ud-Din resubmitted today by Mr. Khaled Rehman Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.   REGISTRAR
2	15-4-2014	This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>12-6-2014</u> .   CHAIRMAN

SCANNED  
BY  
Pestrawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 492 /2016

Zahoor-ud-Din  
.....Appellant

Versus

The Govt. and others  
.....Respondents

INDEX

S.No.	Description of Documents	Date	Annexure	Pages
1.	Memo of Service Appeal			1-4
2.	Initial appointment letter	15.11.1988	A	5-6
3.	Appointment order	13.04.1991	B	0-7
4.	Extracts from the Service Book		C	8-12
5.	Provisional Seniority List	07.05.2012	D	13-17
6.	Impugned Notification/ Seniority List	23.04.2013	E	18-22
7.	Departmental Representation	09.12.2013	F	0-23
8.	Letter from the Skill Development Centre, Bajaur	21.05.1991	G	0-24
9.	Wakalat Nama			

Through **Appellant**

**Khaled Rahman**  
Advocate,  
Supreme Court of Pakistan,  
3rd Haroon Mansion,  
Khyber Bazar, Peshawar  
Cell # 0345-9337312

Dated: 01/06/2016

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 492 /2014

Zahoor-ud-Din  
Instructor (Electrical),  
Govt. Technical Vocational Centre,  
Ghazni Khel, Lakki Marwat.....Appellant

Versus

1. The Khyber Pakhtunkhwa Technical Education & Vocational Training Authority (TEVTA), Peshawar through its Chairman.
2. The Managing Director/Vice-Chairman, Khyber Pakhtunkhwa Technical Education & Vocational Training Authority (TEVTA), Peshawar.
3. The Govt. of Khyber Pakhtunkhwa through Secretary Industries, Technical Education & Manpower Training, Civil Secretariat, Peshawar.
4. The Director General, Technical Education & Manpower Training, Khyber Pakhtunkhwa, Benevolent Fund Building, Peshawar Cantt.
5. Mr. Bashir Ahmad, Senior Instructor (Electrical) (BPS-17), Govt. Technical Vocational Centre (B), D.I.Khan.
6. Mr. Tariq Jan, Instructor (Electrical) Govt. Technical Vocational Centre (B), D.I.Khan.....Respondents

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**AMENDED SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION/SENIORITY LIST DATED 23.04.2013 COMMUNICATED ON 07.12.2013 VIDE WHICH**

RESPONDENT NO.5&6 BEING JUNIORS TO THE APPELLANT WERE PLACED SENIOR TO THE APPELLANT IN VIOLATION OF THE LAW AGAINST WHICH APPELLANT PREFERRED A DEPARTMENTAL REPRESENTATION TO THE APPELLATE AUTHORITY ON 09.12.2013 BUT THE SAME WAS NOT DISPOSED OF WITHIN THE STATUTORY PERIOD OF 90 DAYS.

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**PRAYER:**

On acceptance of the instant appeal, the impugned Notification/Seniority List dated 23.04.2013 may graciously be modified by placing the appellant senior to the Respondent No.5&6 being junior to the appellant.

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Respectfully Sheweth,

Facts giving rise to the present appeal are as under:-

1. That appellant is the employee of Technical Education & Manpower Training Department, Khyber Pakhtunkhwa serving as Instructor (Electrical) (BPS-14). He initially joined the service as Instructor (Electrical) (BPS-14) vide appointment letter dated 15.11.1989 (**Annex:-A**) and thereafter, vide order dated 13.04.1991 (**Annex:-B**) he was adjusted as Instructor (Electrical) after observing all the codal formalities. (Extracts from the Service Book **Annex:-C**).
2. That vide letter dated 07.05.2012 (**Annex:-D**) provisional Seniority List of Instructor (BPS-14) was circulated wherein appellant was correctly placed at Serial No.16 whereas Respondents No.5&6 were shown at Serial No.17 & 19 but

thereafter vide impugned Notification/Seniority List dated 23.04.2013 (**Annex:-E**) communicated on 07.12.2013, Respondents No.5&6 have been placed at Serial No.3&5 while appellant being senior has been senior has been shown at Serial No.7 in violation of the law and rules.

3. That being aggrieved of the impugned Notification/Seniority List *ibid*, appellant challenged the same through Departmental Representation on 09.12.2013 (**Annex:-F**) through proper channel but the same has not been disposed of within the statutory period of 90 days, hence this appeal *inter-alia* on the following grounds:-

**Grounds:**

- A. That Respondents have not treated appellant in accordance with law, rules and policy on subject and acted in violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973 and unlawfully issued the impugned Notification/Seniority List, which is unjust, unfair and hence not sustainable in the eye of law.
- B. That the impugned Notification/Seniority List is in violation of Section-8 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-17 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, hence the same is liable to be struck down.
- C. That Respondents No.5&6 are established juniors to the appellant and they were illegally shown as senior to the appellant in the impugned



Notification/Seniority List. It is pertinent to mention here that Respondent No.5 (Muhammad Bashir) was appointed on the post vacated by the appellant as is evident from the letter dated 21.05.1991 (**Annex:-G**).

- D. That Respondent No.5&6 have never challenged the seniority position of the appellant and have therefore acknowledged the appellant as senior to them, therefore, the issue of seniority amongst the appellant and Respondent No.5&6 has attained finality and cannot be reopened abruptly.
- E. That appellant has been condemned unheard as he has been deprived of his valuable rights without informing him or providing him opportunity of hearing, therefore, the impugned Notification/Seniority List is against the principle of natural justice and thus not maintainable.
- F. That appellant would like to offer some other grounds during the course of arguments.

It is, therefore, humbly prayed that the instant appeal may graciously be accepted as prayed for above.

Any other relief as deemed appropriate in the circumstances of case not specifically asked for, may also be granted to appellant.

Through

Appellant

Khaled Rahman,  
Advocate, Peshawar

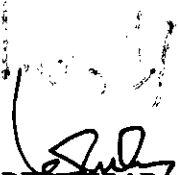
Dated: 01/06/2016

The appeal of Mr. Zahoor-ud-Din Instructor Electrical GTVC Ghazni Khel Lakki Marwat received today i.e. on 20 .03.2014 is incomplete on the following scores which is returned to the counsel for the appellants for completion and resubmission within 15 day.

- 1- Appeal may be got signed by the appellant.
- 2- Annexures of the appeal may be attested.
- 3- Annexure-D of the appeal is illegible which may be replaced by legible/better one.
- 4- Wakalat Nama in favor of appellant is not attached with the appeal which may be placed on it.
- 5- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 176 /S.T,

Dt. 21/03 /2014.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Khaled Rehman Adv. Pesh.

PTO

Sir  
Resubmitted after Removing  
The objection-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 499 /2014

Zahoor-ud-Din

.....Appellant


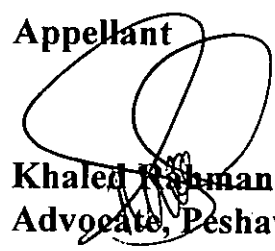
Versus

The Govt. and others

.....Respondents

INDEX

S.No.	Description of Documents	Date	Annexure	Pages
1.	Memo of Service Appeal			1-4
2.	Initial appointment letter	15.11.1988	A	5-6
3.	Appointment order	13.04.1991	B	0-7
4.	Extracts from the Service Book		C	8-12
5.	Provisional Seniority List	07.05.2012	D	13-17
6.	Impugned Notification/ Seniority List	23.04.2013	E	18-22
7.	Departmental Representation	09.12.2013	F	0-23
8.	Letter from the Skill Development Centre, Bajaur	21.05.1991	G	0-24
9.	Wakalat Nama			

Through   
Appellant  
  
Khaled Rahman  
Advocate, Peshawar

Dated: 21 / 03/ 2014

Cell # 0345-9337312

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 492 /2014

Zahoor-ud-Din  
Instructor (Electrical),  
Govt. Technical Vocational Centre,  
Ghazni Khel, Lakki Marwat.....Appellant

413  
20/3/2014

Versus

1. The Govt. of Khyber Pakhtunkhwa through Secretary Industries, Technical Education & Manpower Training, Civil Secretariat, Peshawar.
2. The Director General, Technical Education & Manpower Training, Khyber Pakhtunkhwa, Benevolent Fund Building, Peshawar Cantt.
3. Mr. Bashir Ahmad, Senior Instructor (Electrical) (BPS-17), Govt. Technical Vocational Centre (B), D.I.Khan.
4. Mr. Tariq Jan, Instructor (Electrical) Govt. Technical Vocational Centre (B), D.I.Khan.....Respondents

---

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION/SENIORITY LIST DATED 23.04.2013 COMMUNICATED ON 07.12.2013 VIDE WHICH RESPONDENT NO.3&4 BEING JUNIORS TO THE APPELLANT WERE PLACED SENIOR TO THE APPELLANT IN VIOLATION OF THE LAW AGAINST WHICH APPELLANT PREFERRED A DEPARTMENTAL REPRESENTATION TO THE

20/3/14

re-submitted to-497 and filed.

8/4/14

**APPELLATE AUTHORITY ON 09.12.2013 BUT THE SAME WAS NOT DISPOSED OF WITHIN THE STATUTORY PERIOD OF 90 DAYS.**

---

**PRAYER:**

On acceptance of the instant appeal, the impugned Notification/Seniority List dated 23.04.2013 may graciously be modified by placing the appellant senior to the Respondent No.3&4 being junior to the appellant.

---

Respectfully Sheweth,

Facts giving rise to the present appeal are as under:-

1. That appellant is the employee of Technical Education & Manpower Training Department, Khyber Pakhtunkhwa serving as Instructor (Electrical) (BPS-14). He initially joined the service as Instructor (Electrical) (BPS-14) vide appointment letter dated 15.11.1989 (**Annex:-A**) and thereafter, vide order dated 13.04.1991 (**Annex:-B**) he was adjusted as Instructor (Electrical) after observing all the codal formalities. (Extracts from the Service Book **Annex:-C**).
2. That vide letter dated 07.05.2012 (**Annex:-D**) provisional Seniority List of Instructor (BPS-14) was circulated wherein appellant was correctly placed at Serial No.16 whereas Respondents No.3&4 were shown at Serial No.17 & 19 but thereafter vide impugned Notification/Seniority List dated 23.04.2013 (**Annex:-E**) communicated on 07.12.2013, Respondents No.3&4 have been

placed at Serial No.3&5 while appellant being senior has been shown at Serial No.7 in violation of the law and rules.

3. That being aggrieved of the impugned Notification/Seniority List *ibid*, appellant challenged the same through Departmental Representation on 09.12.2013 (**Annex:-F**) through proper channel but the same has not been disposed of within the statutory period of 90 days, hence this appeal *inter-alia* on the following grounds:-

**Grounds:**

- A. That Respondents have not treated appellant in accordance with law, rules and policy on subject and acted in violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973 and unlawfully issued the impugned Notification/Seniority List, which is unjust, unfair and hence not sustainable in the eye of law.
- B. That the impugned Notification/Seniority List is in violation of Section-8 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-17 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, hence the same is liable to be struck down.
- C. That Respondents No.3&4 are established juniors to the appellant and they were illegally shown as senior to the appellant in the impugned Notification/Seniority List. It is pertinent to

mention here that Respondent No.3 (Muhammad Bashir) was appointed on the post vacated by the appellant as is evident from the letter dated 21.05.1991 (Annex:-G).

- D. That Respondent No.3&4 have never challenged the seniority position of the appellant and have therefore acknowledged the appellant as senior to them, therefore, the issue of seniority amongst the appellant and Respondent No.3&4 has attained finality and cannot be reopened abruptly.
- E. That appellant has been condemned unheard as he has been deprived of his valuable rights without informing him or providing him opportunity of hearing, therefore, the impugned Notification/ Seniority List is against the principle of natural justice and thus not maintainable.
- F. That appellant would like to offer some other grounds during the course of arguments.

It is, therefore, humbly prayed that the instant appeal may graciously be accepted as prayed for above.

Any other relief as deemed appropriate in the circumstances of case not specifically asked for, may also be granted to appellant.

Through

Appellant

Khaled Rahman,  
Advocate, Peshawar

Dated: 21 / 03/ 2014



Annex "A"

(5)

GOVERNMENT OF N.W.F.P.  
DIRECTORATE OF MANPOWER & TRAINING  
210 IMPROVEMENT FUND BUILDING  
PESHAWAR CAMPUS.

To

Mr. Zahoor-ud-Din, S/O  
Siraj-ud-Din,  
Village & P.O. Khern Khell  
Pacca Tehsil Sakki, District  
Bannu.

SUBJECT:- APPOINTMENT

~~On the basis of the selection of Departmental Selection~~  
Committee, you are hereby appointed as Instructor (Elect.) B-14  
with usual allowances as admissible under the rules in Skill  
Development Centre Khar on the following terms  
and conditions:-

- (1) the post is temporary and non pensionable but likely to become regular and pensionable.
- (2) the appointment under the Skill Development Programme will be on purely temporary basis and will last till the continuity of the programme.
- (3) the appointment will be liable to termination at 14 days notice or on the payment of 14 days pay in lieu thereof. In case you wish to resign at any time, 14 days notice will be necessary or in lieu thereof 14 days pay will be forfeited.
- (4) the appointment will be further subject to:-
  - a) the production of Medical Certificate of fitness from the Civil Surgeon/Medical Superintendent concerned.
  - b) the production of original educational Degree/Certificates, domicile and experience certificates and an attested copy of National Identity Card.
  - c) satisfactory verification of character and antecedents by the concerned police; and
  - d) production of two character certificates from gazetted Government Officers in B-17 and above or from a stipendiary Magistrate.
- (5) You will be governed by the NWFP Civil Servants Acts, 1973 and other rules, regulations and orders relating to your pay, Allowances, Leave T.A, Medical Attendance etc; as have been and may thereafter be prescribed by the Provincial Government and made applicable to the category of Government servants to which you belong.
- (6) You will have to join duties at your own expense.

You will have to serve any-where in NWFP.

Contd. P/2.

A/c

6

If the appointment is acceptable to you on the above terms/conditions, please convey your acceptance in writing and report to the Training Manager, Skill Development Centre, Khar on or before 28-11-1988 failing which it will be presumed that you are not interested in the post and the appointment will be treated as withdrawn.

(SHAMDAR ALI KHAN  
DIRECTOR  
MANPOWER & TRAINING.

Ref. No. LMT/133/Estt/735

Dated: 15/11-1988.

Copy for information and necessary action to:-

- 1) The Assistant Director (Budget & Accounts) Directorate of Manpower & Training, Peshawar.
- 2) The Assistant Director (Technical) Directorate of Manpower & Training, NWFP, Peshawar.
- 3) The Training Manager, Skill Development Centre, Khar. He is requested to take the following action:-

- i) on arrival of the appointed, he may be taken on strength under intimation to this Director
- ii) complete the formalities mentioned in para-sub para-3 of Para-1 of this orders. After the needful is done, compliance may be led to this Directorate.
- iii) an undertaking in the enclosed form may be obtained from the appointed and a copy thereof be sent to us for record.

- 4) Personal file of the appointee.
- 5) File No. SRC/161/Estt

*Muhammad Rashid*  
(MOHAMMAD RASHID  
Deputy Director

S. S. H. /

*Ate*

(7)

Annex "B"

GOVERNMENT OF S.W.A.F.P.  
DIRECTORATE OF MANPOWER & TRAINING  
EMPLOYMENT POND BUILDING  
HALL-210, PESHAWAR CANTT.

ORDER.

Mr. Zahooruddin, Instructor Electrical Skill Development Centre, Khar (Bajaur Agency) is appointed/adjusted against the post of Instructor Textile Witter in Apprenticeship Training Centre, Mardan. He will however work as Instructor Electrical in the Centre. Following are the terms and condition of the appointment/adjustment.


- i) his appointment/adjustment will be subject to clearance by Departmental Selection Committee of the Directorate.
- ii) his appointment will be purely on temporary basis and will be ~~subject to termination at any time without assigning any reasons.~~ liable to termination at any time without assigning any reasons.
- iii) In case he wishes to resign at any time, 14 days notice will be necessary or in lieu thereof 14 days salary will be forfeited.
- iv) he will be liable to transfer any where in NWFP in the public interest during his service in the Department.

Director  
Manpower & Training

Encl: No. ENT/750-57/275-19 dated 13/4/1991.

Copy to:

1. The District Accounts Officer, Mardan.
2. The Principal, Apprenticeship Training Centre, Mardan.
3. The Assistant Director (Accounts) Manpower & Training Directorate.
4. The Incharge SDO, Khar (Bajaur Agency).
5. Mr. Zahooruddin, Instructor Electrical Khar (Bajaur Agency).
6. Office Copy.

  
( ABDUL BAYAN SAEED )  
ASSISTANT DIRECTOR (ADMIN)

Atef

Annet "C"

(8)

1. Name (نام).....
2. Nationality and Religion .....  
(قومیت اور مذہب)
3. Residence (مستقل رہائش).....
4. Father's name and residence.....  
(والد کا نام اور پتہ)
5. Date of birth by Christian era as  
nearly as can be ascertained.....  
(تاریخ پیدائش مطابق سن عیسوی)
6. Exact height by measurement.....  
(قد و قامت)
7. Personal mark for identification.....  
(نشان شناخت)

BASHIR AHMAD  
Pakistani / Islam.  
village P.O Abba Khel, Tehsil Lakki  
Marwat Distt. Bannu.  
FAIZ ULLAH KHAN.  
13/3/1967  
5-5  
A wound on left hand.

Left hand/right hand thumb and finger-impressions of (Non-gazetted) officer

(مرد کی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger (چونکیا) Ring Finger (چونکیا کے ساتھ کی انگلی) Middle Finger (انگشت میاں)



Fore Finger (انگشت شہادت)

Thumb (انگونہا)



Signature of Government servant.....

(سرکاری ملازم کے دستخط)

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

(تصدیق کنندہ افسر کے دستخط اور مہر)

Skilled Typing Unit Centre

The entries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after every 5 years under this rule.

اس صفحہ کے مندرجات کم از کم پانچ سال بعد تصدیق ہونا ضروری ہیں اور نمبر 9 و 10 میں دستخطوں کے لیے تاریخ ہونی چاہئے۔ انگلیوں کے نشانات کے لیے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں۔





Form No. 8	تاریخ انقطاع ملازمت	درجہ ہات انقطاع ملازمت	دستخط افسر مجاز	Duration of leave taken	تعمیرات کی قیمت	دستخط افسر مجاز	سربراہ ایجنسی	11
دستخط افسر مجاز				Period	قیمت و نوعیت			
				Govt. to which debited	رقم ادا ہونے			

Basic pay scale revised under the circular letter No. FD (PR) 1-1/89 dated 11-8-91 of N.W.F.P. Govt. (Finance department) and financial Pt = 1768/- P.M. w.e. 6-1-6-1991.

*[Signature]*  
INCHARGE,  
Skill Development Centre  
KHAR (Bajaur Agency.)

(4)

Service was from 1/5/91 to 31-12-91 and granted an amount under Pt. 191 w.e. 6-1-12-91.

*[Signature]*  
INCHARGE,  
Skill Development Centre  
KHAR (Bajaur Agency.)

N.W.F.P. Secretary to Industries, Commerce, Mining & Development (Ad) 8-11/88/Vol. VII/9732 dated 5/7/1992  
N.T. of N.W.F.P. Advice No. 1/2 (Exec) SNE-B.O. VII/B.O. VIII/F.D. 47(19) N.V.T.P/90-91 dated 25.8.1990-10/1991. Sanction is hereby accorded to the appointment of the Skill Development Centre, Khar-Bajaur Agency of the N.W.F.P. per letter w.e. 6 (13-4-1991).

INCHARGE,  
*[Signature]*  
Haji Mohammad Gayans  
Senior Instructor (Technical)  
Govt: Skill Development Centre  
Khar - Bajaur Agency.

*[Signature]*

درجہ ملازمت	عارضی، مستقل یا قائم مقام	rule 3.20 of C.S.R. (Pb.) volum II مگر عارضی ہے تو کیا وہ رول کے مطابق پیشن کا مستحق ہے	تختہ بلور عارضی ملازمت	زائد تختہ بلور قائم مقام	مساواتے تختہ بلور الائٹس	تاریخ تقرری (12)	کاروباری
-------------	---------------------------------	--	------------------------------	--------------------------------	-----------------------------------	------------------------	----------

Instructor (Elct)	Teacher	—	RS. R 1768	PS. P —	—	1-6-91	
BB5-14							
— do —	— do —	—	1887/-	—	—	1-12-91 (F.H)	

Service regulated vide Notification of  
Labour & Transport department  
In pursuance of Finance department  
FD/95-91 dated 19-3-90, U.  
and 23/1/77/F-II 90-91  
By adjustment of the official work  
Directorate of Man Power & TR

Ate



Better Copy

Annex "D"

(13)

GOVERNMENT OF KHYBER PAKHTUNKHWA  
DIRECTORATE GENERAL TECHNICAL EDUCATION  
& MANPOWER TRAINING, PESHAWAR  
BENEVOLENT FUND BUILDING PESHAWAR CANT.

No.DGTE7MT/Estt-II/Seniority/B-14/2760

Dated 7/5/2012

To

The Principal,  
Govt. Technical & Vocational Center,  
Ghazni Khel, Lakki Marwat.

Subject;

PROVISIONAL SENIORITY LISTS OF INSTRUCTOR (BPS-14) AT  
GOVERNMENT TECHNICAL AND VOCATIONAL TRAINING  
CENTRES

Enclosed please find herewith-provisional Seniority Lists of Instructor (BPS-14) of your center as updated up to 31-12-2011.

The same may please be circulated amongst the Electrical Staff of your center. A copy duly signed by the respective officials along with objections, if any, may be returned to this office within 30 days of the issuance of this letter.

No objection will be entertained after the expiry of prescribed date.

Atc

SD/-  
ASSISTANT DIRECTOR (ADMN)

091-9213027



GOVERNMENT OF KHYBER PAKHTUNKHWA  
DIRECTORATE GENERAL TECHNICAL EDUCATION  
& MANPOWER TRAINING, PESHAWAR  
BENEVOLENT FUND BUILDING PESHAWAR CANTT

Registered

Annex "D"

13

No. DGTE&MT/Esst-II/Seniority/B-14/ 276<sup>9</sup>

Dated 7/5/2012

To

The Principal,  
Govt. Technical & Vocational  
Center Chhazn. Khel, LAKKI MAMUD

Subject: PROVISIONAL SENIORITY LISTS OF INSTRUCTOR (BPS-14) AT GOVERNMENT  
TECHNICAL AND VOCATIONAL TRAINING CENTRES

Enclosed please find herewith provisional seniority lists of Instructor (BPS-14) of your center as updated up to 31-12-2011.

The same may please be circulated amongst the ELECTRICAL staff of your center. A copy duly signed by the respective officials along with objections, if any, may be returned to this office within 30 days of the issuance of this letter.

No objection will be entertained after the expiry of prescribed date.

ASSISTANT DIRECTOR (ADMN)

Atte

16	Mr. Nazir Mohammad i- Matric ii- 02 years Certificate	01-01-1956 Abbottabad	27-04-1980 BPS-10	19-07-2002	14	By Promotion
17	Syed Mahmood Shah i-MA Pushto ii- 01 year Certificate Electrical iii- Electrical Certificate (ABCD) iv) 06 months Inst. Trg: Course.	15-07-1957 Mardan	24-04-1980 (BPS-06) 27-08-1990 (BPS-10) 19-07-2002 (BPS-14)	19-07-2002	14	By Promotion
18	Mr. Abdul Hamid i- Matric ii) 02 years Certificate iii- 06 months Certificate	02-04-1961 D. I Khan	27-08-1990 (BPS-10)	19-07-2002	14	By Promotion
19	Mr. Razimullah i- FA ii- 02 years Certificate in electrician, iii) competency certificate. iv) One year Teacher Training Diploma.	19-01-1965 Nowshera	27-08-1990 (BPS-10)	19-07-2002	14	By Promotion
20	Mr. Saqib Shah Matric ii- 02 years Certificate	06-01-1964 Peshawar	19-03-1986 (BPS-10)	26-05-2004	14	By Promotion
21	Mr. Junaid Ur Rehman DAE Electrical	12-02-1985 Charsadda	27-04-2006	27-04-2006	14	By Initial recruitment
22	Mr. Sher Aslam i) Matric. ii) 2, year Certificate	01-01-1963 Haripur.	30-08-1993 (BPS-06) 05-05-2006 (BPS-14)	05-05-2006	14	By Promotion
23	Mr. Inam Ullah i) BA, ii) D.A.E. Electrical	17-06-1960 Charsadda	10-11-1990 (BPS-06) 2002 (BPS-10) 16-05-2006 (BPS-14)	16-05-2006	14	By Promotion
24	Mr. Farooq Said i) BA, ii) DAE	25-07-1970 Dr (L)	1993 (BPS-06) 17-04-2007 (BPS-14)	17-04-2007	14	By Promotion

21

*Atte*

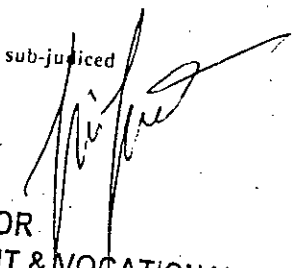
DEPUTY DIRECTOR (ADMN)

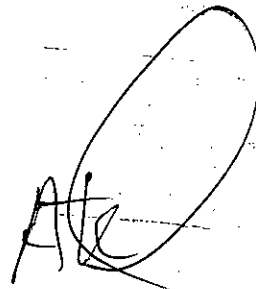
*col*

22

	Malik Zeb, Matric ii- 02 years Certificate	01-09-1960 Mardan	01-01-1985 (BPS-10) 11-12-2007 (BPS-14)	11-12-2007	14	By Promotion
26	Mr. Abdul Shahid i) Matric ii- 02 years Certificate	18-04-1968 Kohat	24-01-1990 (BPS-10) 11-12-2007 (BPS-14)	11-12-2007	14	By Promotion
27	Mr. Zahid Saeed i) Matric ii) DAE Electrical	01-04-1980 Abbottabad	25-01-2012	25-01-2012	14	By Initial recruitment

Certified that the seniority has been circulated and no objection has been received, seniority is final/un-disputed and not sub-judiced

  
DIRECTOR  
SKILL DEVELOPMENT & VOCATIONAL  
TRAINING



DEPUTY DIRECTOR (ADMN)

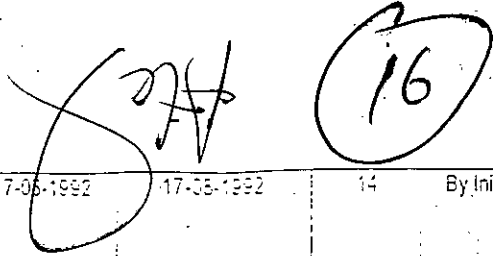
20

8	Mr. Shafiqat Ullah i) Matric. ii) 3, Years D.A.E. iii) 06 months Inst: Trag: Course.	09-05-1957 Bannu	01-07-1991	31-07-1993	14	By Initial recruitment
9	Mr. Muhammad Ajmal i) F.A. ii) 2, Years TPC. iii) 6, Months Instructor Training Course. iv) 5, Months Advance Training from (PR, CHINA)	30-05-1958 Mansehra	29-08-1991	31-07-1993	14	By Initial recruitment
10	Mr. Muhammad Jamil i) Matric. ii) 18, Months TPC. iii) 6, Months Instructor Training Course. vi) G-II TPC	10-05-1969 Abbottabad	14-05-1992	31-07-1993	14	By Initial recruitment
11	Muhammad Ibrahim i) M.A.L.L.B. ii) 2, Years TPC iii) 06 month inst: Trag: Course	15-09-1960 Karak	17-08-1992	31-07-1993	14	By Initial recruitment
12	Muhammad Ayaz Khan i) B.A. ii) 3, Years D.A.E. competency Certificate (Electrical) iii) 6, Months Instructor Training Course.	01-07-1967 Peshawar	30-08-1992	31-07-1993	14	By Initial recruitment
13	Mr. Fakhru Zaman i) Matric. ii) G-II level Certificate from NTB Islamabad iii) 1, Year TPC iv) Trade Diploma Electrical (VTP) GCT. v) 6, Month Instructor Training Course.	01-08-1962 Swabi	1982 H/Supdt: (BPS-5) 14-09-1992 (BPS-14)	31-07-1993	14	By Initial recruitment
14	Mr. Mohammad Nawab i) DAE Electrical	Swabi	01-08-1999	01-06-1999	14	By Initial recruitment
15	Mr. Faridullah i) Electrical Supervisor ii) 350 Hours Electrical Course	14-03-1955 Peshawar	14-12-1977 (BPS-08) 01-02-1990 (BPS-10) 01-02-2002 (BPS-14)	01-02-2002	14	By Promotion

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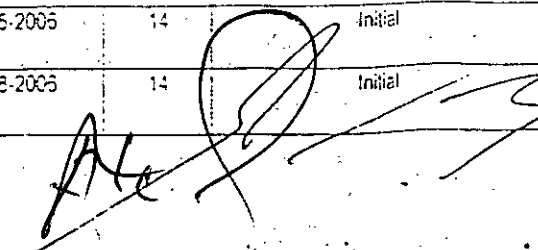
DEPUTY DIRECTOR (ADMIN)

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22	Muhammad Ibrahim i) M.A.L.L.B. ii) 2, Years TPC iii) 06 month inst. Trng. Course	15-09-1960 Karak	17-06-1992	17-06-1992	14	By Initial recruitment as Instructor. 31-07-1993
23	Muhammad Ayaz Khan i) B.A. ii) 3, Years D.A.E. competency Certificate Elect. iii) 6, Months Instructor Training Course.	01-07-1967 Peshawar	30-08-1992	30-08-1992	14	By Initial recruitment as Instructor. 31-07-1993
24	Mr. Fakhru Zaman i) Matric. ii) G-II level Certificate from NTB Islamabad iii) 1, Year TPC iv) Trade Diploma Electrical (VTP) G.O.T. v) 6, Month Instructor Training Course.	01-08-1962 Swabi	H/Supdt. 1982 (BPS-5)	14-09-1992 (EPS-14)	14	By Initial recruitment as Instructor. 31-07-1993
25	Mr. Mohammad Nawab i- DAE Electrical	Swabi	01-06-1999	01-06-1999	14	Initial
26	Mr. Fandullah i) Electrical Supervisor ii) 350 Hours Electrical Course	14-03-1955 Peshawar	14-12-1977	01-02-2002	14	Promotion
27	Mr. Nazir Mohammad i- Matric ii- 02 years Certificate	01-01-1956 Abbottabad	27-04-1990	19-07-2002	14	Promotion
28	Mr. Razimullah i- FA ii- 02 years Certificate in electrician, iii) competency certificate	06-01-1955 Nowshera	18-12-1995	19-07-2002	14	Promotion
29	Mr. Abdul Hamid i- Matric ii) 02 years Certificate iii- 06 months Certificate	02-04-1961 D. I Khan	15-08-1984	19-07-2002	14	Promotion
30	Syed Mahmood Shah i- MA Pushto ii- 01 year Certificate Electrical iii- Electrical Certificate (ABCD)	15-07-1957 Mardan	19-03-1990	26-07-2004	14	Promotion
31	Mr. Saqib Shah Matric ii- 02 years Certificate	06-01-1964 Peshawar	19-03-1996	26-05-2004	14	Promotion
32	Mr. Gul Muhammad (cadre changed) i) M.A. ii) D.A.E. (Electrical)	22-02-1973 Karak	23-07-2002	27-04-2005	14	Initial
33	Mr. Junaid Ur Rehman DAE Electrical	12-02-1985 Charsadda	27-04-2005	27-05-2005	14	Initial
34	Mr. Sher Aslam i) Matric. ii) 2, year Certificate	01-01-1963 Haripur.	03-1993	05-05-2006	14	Initial
35	Mr. Inam Ullah i) BA, ii) D.A.E. Electrical	17-06-1960 Charsadda	10-11-1993	16-05-2006	14	Initial
36	Mr. Dad Muhammad (cadre changed) i) Matric, ii) D.A.E. (Electrical).	01-03-1972 Karak	11-07-1997	01-08-2006	14	Initial





**PROVISIONAL SENIORITY LIST OF INSTRUCTOR (ELECTRICAL TRADE) (BPS-14) GTVS STREAM IN THE DEPARTMENT OF THE TECHNICAL EDUCATION AND MANPOWER  
TRAINING DEPARTMENT (AS STOOD ON 31-12-2011)**

S.No.	Name of incumbent with Academic qualification	Date of Birth & Domicile	Date of 1 <sup>st</sup> entry into Govt. Service	Regular appointment Date	Promotion to the post present post.		
					BPS	Method of recruitment Appointment	Remarks
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
01	Mr. Momin Khan i) B.A. ii) G-III level Certificate from NTB Islamabad. iii) 6, Months Instructor Training Course iv) 18, Months TPC.	05-01-1961 Swat.	01.01.1986	01.01.1986	14	By way of absorption/adjustment as Instructor. 01.01.1986	
02	Mr. Muhammad Javid i) B.A. ii) G-II level Certificate from NTB Islamabad. iii) 18, Months TPC iv) 1 year Instructor Training Course v) ABCD Elec: Supervisor Competency Certificate	15-02-1958 Abbottabad	01.01.1986	01.01.1986	14	By way of absorption/adjustment as Instructor. 01.01.1986	
03	Mr. Sattar Ullah Jan i) Matric ii) G-II level Certificate from NTB Islamabad. iii) 18, Months TPC.	15-03-1964 Karak	01.02.1986	01.02.1986	14	By way of absorption/adjustment as Instructor. 01.02.1986	
04	Mr. _____ i) F.A ii) 18, Months TPC. iii) 6, Months Training Course from Karachi iv) 6, Months Training Course from Service Tribunal, Peshawar v) 5, Months Advance Training from (PR. CHINA)	11-03-1963 D.I.Khan	1-__1984 (BPS__)	_____	14	By way of absorption/adjustment as Instructor. ____1988	
05	Mr. Muhammad Inam Khan i) Matric ii) 3 Years D.A.E. iii) 6, Months Instructor Training Course	31-08-1962 D.I.Khan	21.05.1986	21.05.1986	14	By initial recruitment 21.05.1986	
06	Mr. Muhammad Idrees Khan i) Matric ii) 3 Years D.A.E. iii) 1 Year Instructor Training Course iv) 5, Moths Advance Training Course from (PR. CHINA)	25-08-1960 Dir	04.10.1987	04.10.1987	14	By way of absorption/adjustment as Instructor. 01.02.1990	
07	Mr. Ghulam Nabi i) Matric ii) 3 Years D.A.E. iii) 6, Months Instructor Training Course	15-03-1955 Mardan	18.04.1988	18.04.1988	14	By way of absorption/adjustment as Instructor. 01.02.1990	
08	Mr. Sabz Ali i) B.A. ii) G-II level Certificate from NTB Islamabad. iii) 18, Months TPC iv) 6, Months Instructor Training Course	20-11-1962 Peshawar	20.04.1988	20.04.1988	14	By way of absorption/adjustment as Instructor. 01.02.1990	
09	S. Sajjad Hussain i) Matric ii) 3 Years D.A.E. iii) 6, Months Instructor Training Course	20-05-1964 D.I.Khan	23.04.1988	23.04.1988	14	By way of absorption/adjustment as Instructor. 01.07.1991	

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PROVISIONAL SENIORITY LIST OF INSTRUCTOR (ELECTRICAL TRADE) (BPS-14) GTVCs STREAM IN THE DEPARTMENT OF THE TECHNICAL EDUCATION AND MANPOWER TRAINING DEPARTMENT. (AS STOOD ON 31-12-2011)

S.No	Name of incumbent with Academic qualification.	Date of Birth & Domicile	Date of 1 <sup>st</sup> entry into Govt. Service.	Regular appointment Date	Promotion to the post present post.		
					BPS	Method of recruitment Appointment	Remarks
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
01	Mr. Momin Khan i) B.A. ii) G-II level Certificate from NTB Islamabad. iii) 6, Months Instructor Training Course. iv) 18, Months TPC.	05-01-1961 Swat.	01-01-1985	01-01-1985	14	By way of absorption/ adjustment as Instructor. 01-01-1986	
02	Mr. Muhammad Jawid i) B.A. ii) G-II level Certificate from Islamabad iii) 18, Months TPC iv) 1 years Instructor Training Course v) ABOE Elect. Supervisor Competency Certificate vi) Senior Clerk Jan	15-02-1958 Abbottabad	01-01-1986	01-01-1985	14	By way of absorption/adjustment as Instructor. 01-01-1986	
03	Mr. Saifullah Jan i) Matric. ii) G-II level Certificate from NTB Islamabad. iii) 18, Months TPC	05-03-1954 Karak	01-02-1985	01-02-1985	14	By way of absorption/adjustment as Instructor. 01-02-1986	
04	Mr. Shafiq Khan i) B.A. ii) 18, Months TPC iii) 6, Months Instructor Training Course from Karachi iv) 6, Months Instructor Training Course from S.T. Peshawar v) 5, Months Advance Training from (P.R. CHINA)	11-03-1955 Dir, Karak	13-10-1984 BPS-14	01-02-1985	14	By way of absorption/adjustment as Instructor. 01-02-1986	
05	Mr. Muhammad Inam Khan i) Matric. ii) 3, Years D.A.E. iii) 6, Months Instructor Training Course.	31-05-1962 D.I. Khan	21-05-1986	21-05-1985	14	By Initial recruitment 21-05-1985	
06	Mr. Muhammad Idress Khan i) Matric. ii) 3, Years D.A.E. iii) 1, Years Instructor Training Course. iv) 5, Months Advance Training from (P.R. CHINA)	25-08-1960 Dir	04-10-1987	04-10-1987	14	By way of absorption/adjustment as Instructor. 01-02-1990	
07	Mr. Ghulam Nabi i) Matric. ii) 3, Years D.A.E. iii) 5, Months Instructor Training Course	15-03-1955 Mardan	18-04-1988	18-04-1986	14	By way of absorption/adjustment as Instructor. 01-02-1990	
08	Mr. Sebz Ali i) B.A. ii) G-II level Certificate from NTB Islamabad iii) 18, Months TPC. iv) 6, Months Instructor Training Course	20-11-1962 Peshawar	20-04-1986	20-04-1985	14	By way of absorption/adjustment as Instructor. 01-02-1990	
09	S. Sajjad Hussain i) Matric. ii) 3, Years D.A.E. iii) 6, Months Instructor Training Course	20-05-1964 D.I. Khan	23-04-1986	23-04-1985	14	By way of absorption/adjustment as Instructor. 01-07-1991	

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10	Mr. Shafat Ullah i) Matric ii) 18, Months TPC.	21.10.1964 Bannu	03.05.1988	03.05.1988	14	By way of absorption/adjustment as Instructor. 01.02.1990
11	Mr. Shah Zada Khan i) B.A ii) 3 Years D.A.E. iii) 1 Year Instructor Training Course	12.04.1964 Haripur	04.05.1988	04.05.1988	14	By way of absorption/adjustment as Instructor. 01.02.1990
12	Mr. Saeed Ahmad Khan i) B.A. ii) 18, Months TPC in Electrical. iii) 6, Months Instructor Training Course	13.02.1964 Haripur	21.07.1988	21.07.1988	14	By way of absorption/adjustment as Instructor. 01.02.1990
13	Mr. Zahoor Hayat. i) B.A. ii) 18, Months TPC. iii) Certificate of Competency Elect. supervisor ABCD iv) 1 Year Instructor Training Course	12.03.1962 Swabi	01.09.1988	01.09.1988	14	By initial recruitment as Instructor. 31.07.1993
14	Mr. Ishtiaq Ahmad i) B.A. ii) 3 Years D.A.E. iii) 6, Months Instructor Training Course	25.04.1966 Charsadda	05.09.1988	05.09.1988	14	By way of absorption/adjustment as Instructor. 01.02.1990
15	Mr. Bakhtiar Ali i) Matric ii) 3 Years D.A.E. iii) 6, Months Instructor Training Course iv) Competency Certificate	25.01.1966 Swabi	16.02.1991	16.02.1991	14	By initial recruitment. 01.02.1991
16	Mr. Zahoor-ud-Din i) Matric ii) 3 Years D.A.E.	12.10.1964 Bannu	14.04.1991	14.04.1991	14	By initial recruitment as Instructor. 31.07.1993
17	Mr. Tariq Jan i) Matric ii) 3 Years D.A.E.	10.03.1962 Bannu	01.07.1991	01.07.1991	14	By way of absorption/adjustment as Instructor. 01.07.1991
18	Mr. Shafqat Ullah i) Matric ii) 3 Years D.A.E.	09.05.1967 Bannu	01.07.1991	01.07.1991	14	By initial recruitment as Instructor. 31.07.1993
19	Mr. Bashir Ahmad i) B.A ii) 18, Months TPC iii) 1, Years TPC in (Auto)	13.03.1967 Bannu	01.07.1991	01.07.1991	14	By way of absorption/adjustment as Instructor. 01.07.1991
20	Mr. Muhammad Ajmal i) F.A ii) 2 Years TPC iii) 6, Months Instructor Training Course iv) 5, Months Advance Training from (PR. CHINA)	30.05.1958 Mansehra	29.08.1991	29.08.1991	14	By initial recruitment as Instructor. 31.07.1993
21	Mr. Muhammad Jamil i) Matric ii) 18, Months TPC iii) 6, Months Instructor Training Course iv) G-II, TPC	10.05.1969 Abbottabad	14.05.1992	14.05.1992	14	By initial recruitment as Instructor. 31.07.1993

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(17)

37	Mr. Rasool Gul i. Matric ii- DAE (Electrical)	07.02.1974 Bannu	03.04.2007	03.04.2007	14	Initial	
38	Mr. Farooq Said i. BA ii- DAE	25.07.1990 Dir (L)	17.04.2007	17.04.2007	14	Initial	
39	Malik Zeb i. Matric ii- 02 Years Certificate	01.09.1960 Mardan	01.01.1986	11.12.2007	14	Promotion	
40	Mr. Abdul Shahid i. Matric ii- 02 Years Certificate	18.04.1968 Kohat	24.01.1990	11.12.2007	14	Promotion	

Note: Seniority of the officials at S.No.01 to 40 has been determined on the basis of their date of appointment.

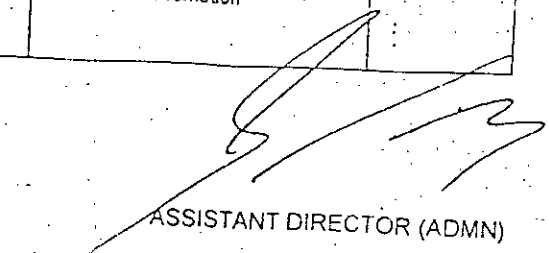
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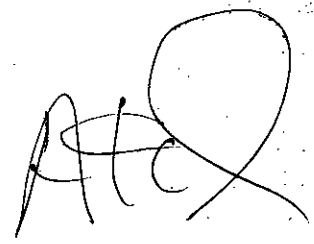
Sd/-  
ASSISTANT DIRECTOR (ADMN)

17

37	Mr. Rasool Gul i) Matric, ii) DAE (Electrical)	07-02-1974 Bannu	03-04-2007	03-04-2007	14	Initial	
38	Mr. Farooq Said i) BA, ii) DAE	25-07-1970 Dir (L)	17-04-2007	17-04-2007	14	Initial	
39	Malik Zeb, Matric ii- 02 years Certificate	01-09-1960 Mardan	01-01-1986	11-12-2007	14	Promotion	
40	Mr. Abdul Shahid i) Matric ii- 02 years Certificate	18-04-1968 Kohat	24-01-1990	11-12-2007	14	Promotion	

Note: Seniority of the officials at S.NO. 01 to 40 has been determined on the basis of their date of appointment.

  
ASSISTANT DIRECTOR (ADMN)



Phone. 091-9213027



GOVERNMENT OF KHYBER PAKHTUNKHWA  
DIRECTORATE GENERAL TECHNICAL EDUCATION  
& MANPOWER TRAINING, PESHAWAR  
BENEVOLENT FUND BUILDING PESHAWAR CANTT

*Re Annex E*

18

NOTIFICATION.

No.DTE&MT/Seniority/A-103 In exercise of the powers conferred under Sub-Section (1) of Section-8 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 Khyber Pakhtunkhwa, Act. No.XVIII of 1973), the Final Seniority List (As Stood on 31-12-2012) of Instructor (Electrical) BPS-14 GTVC in the Directorate General of Technical Education & Manpower Training, Khyber Pakhtunkhwa, Peshawar is hereby notified for information of all concerned (list attached).

DIRECTOR GENERAL

Endst: No.DGTE&MT/Seniority/A-103/ 2851(5-11) Dated 23/4/2013

Copy for information and necessary action to: -

- 1- The Principal GTVC's concerned.
- 2- Office copy.

*Ba M M*  
*[Signature]*

DEPUTY DIRECTOR (ADMN)

*Niaz*  
*Diary & circular*  
*among the staff*

*[Signature]*  
*ATD*

**FINAL SENIORITY LIST OF INSTRUCTOR (ELECTRICAL TRADE) (BPS-14) GTVCs STREAM IN THE DEPARTMENT OF THE TECHNICAL EDUCATION AND  
MANPOWER TRAINING DEPARTMENT (AS STOOD ON 31-12-2012)**

19

S.No	Name of incumbent with Academic qualification.	Date of Birth & Domicile	Date of 1 <sup>st</sup> entry into Govt. Service.	Regular appointment Date	Promotion to the post present post.		
					BPS	Method of recruitment Appointment	Remarks.
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1	Mr. Saeed Ahmad Khan i) B.A., ii) 18, Month TPC in Electrical. iii) 6, Months Instructor Training Course.	13-02-1964 Haripur	21-07-1988	01-02-1990	14	By way of absorption/adjustment as Instructor	
2	Mr. Ishtiaq Ahmad i) B.A. ii) 3, Years D.A.E. iii) 6, Months Instructor Training Course.	25-04-1966 Charsadda	05-09-1988	01-02-1990	14	By way of absorption/adjustment as Instructor	
3	Mr. Bashir Ahmad. i) B.A. ii) 18, Months TPC. iii) 1, Years TPC in (Auto) iv) 6, Month Instructor Training.	13-03-1967 Bannu	26-08-1989	01-02-1990	14	By way of absorption/adjustment as Instructor	
4	Mr. Bakhtiar Ali i) Matric. ii) 3, Years D.A.E. iii) 6, Month Instructor Training, iv) competency certificate	25-01-1966 Swabi	16-02-1991	16-02-1991	14	By Initial recruitment	
5	Mr. Tariq Jan. i) Matric. ii) 3, Years D.A.E. iii) 03 months Inst. Trag. Course.	10-03-1962 Bannu	10-12-1988	01-07-1991	14	By way of absorption/adjustment as Instructor	
6	Mr. Manzoor Hayat i) B.A. ii) 18, Month TPC. iii) Certificate of Competency Elect. supervisor ABCD iv) 1, Year Instructor Training Course.	12-03-1962 Swabi	01-09-1988	31-07-1993	14	By way of absorption/adjustment as Instructor	
7	Mr. Zahoor Ud Din i) Matric ii) 3, Years D.A.E.	12-10-1964 Bannu	14-04-1991	31-07-1993	14	By Initial recruitment	

*Atta*

DEPUTY DIRECTOR (ADMIN)

- 122 -

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To

The Secretary  
Industries, Technical & Manpower  
Khyber Pukhtunkwa

Annex <sup>a</sup> F  
(23)

Through Proper Channel

Subject: - APPEAL FOR CORRECTION IN THE FINAL SENIORITY LIST

Sir,

With due respect it is submitted that;

- The Directorate General Tech: Education & Manpower issued provisional Seniority List of Elec: Instructor (BPS-14) working at Govt: Technical & Vocational Training Centers Endst: No. DGTE & MT/ESTT-II/Seniority/B-14/2760 dated 07/05/52012. ]
- In this provisional S/List, I was placed at S/No. 16 and Mr. Bashir Ahmad was palced at S.No. 19 while Tariq Jan was on S.No. 17 and were shown Junior to me.
- Final S.List issued vide Enst: No. DGTE & MT/ESTT-II/Seniority/A-103/2851(LII) dated 23-04-2013 was received through personal sources(not officially) on 07-12-2013. The final S.List as referred above, my name has been placed at S.No.07 while the incumbent Mr.Bashir Ahmad has been placed at S.No.03 and Tariq Jan at S.No. 06. Thus thses two are shown senior from the applicant which is illegal and contrary to the provisions of existing rules as :
  - I: First of all, I was appointed (vide Ensd: No. DMT/133/Estb/735) as instructor (BPS-14) in 15-11-1989 at Khar Bajaur Agency.
  - li: Then I applied through proper channel in the same department and was adjusted / appointed as Instructor BPS-14 vide Endst: No. DMT/750-51/2715-19 dated 13-04-1991.
  - iii: while Mr. Bashir Ahmad was appointed on the post left by the applicant on dated 26-08-1989 and Mr. Tariq Jan was appointed on 16-02-1991 (as per final S.List column No.4 entry in service )

Keeping in view, all the afore mentioned facts , it is requested to consider my case favorably and sympathetically so that I may not be derived of due right for which I am entitled under rules and issued an order for the correction final S.List before the implementation of DPC recommendations (19-11-2013).

I shall be highly obliged at this act of kindness. Thanks

Dated: 09-12-2013

Atty

Yours Obediently

Zahoor Ud Din Instructor (Electrical)  
GTVC, Ghazni Khel (Lakki Marwat)

No: \_\_\_\_\_ / SDC/Manp/PT/264-67

Dated:- 21/5/1991

From, Skill Development Centre,  
Khar Bajaur.

To, The Principal,  
Govt T.T.C.  
Kalabat.

Annex (B)

24

Subject:- TRANSFER OF ZAHOR-UD-DIN INSTRUCTOR ELECTRICAL.

Reference Directorate of Manpower & Training, Peshawar  
Endst. No. DMT/750-51/2715/19. Dated 13-4-91. You are appointed/  
adjusted against the post of Instructor Textile fitter in T.T.C.  
Mardan, and you will however work as Instructor Electrical in the Centre.  
I have already received your office order copy and the Directorate  
also delivered the same office order copy to The Principal T.T.C.  
Kalabat. But you are still not reported to the undersign for clearance  
and heading the charge while in your against post Instructor Electrical  
for this Centre. Bashir Ahmad already assumed his duty on 3/5/91. and  
by this you are relieved from S.D.C. Khar and now you report in  
T.T.C. Mardan for his duty. Because the Principal T.T.C. Mardan,  
Endst/No: T.T.C/MRD/PT/350-51. Dated 13-6-91. Letter received by me  
to-day dated 21-5-91. asking for you assume the duty at earliest in  
T.T.C. Mardan.

Incharge Officer,  
S. D. C.  
Khar Bajaur.

Copy to :-

- 1:- Director Manpower & Training Peshawar.
- 2:- Principal T.T.C. Mardan.
- 3:- Zahoor-ud-Din (Instructor Electrical T.T.C. Kalabat).

H/c  
21/5/91

Atc



WAKALAT NAMA

IN THE COURT OF K.P.K Sexua Tribunal

Peshawar

Zahoor-ud-dai

Appellant(s)/Petitioner(s)

VERSUS

Govt. & others

Respondent(s)

I/We Appellant do hereby appoint  
Mr. Khaled Rehman, Advocate in the above mentioned case, to do all or  
any of the following acts, deeds and things.

1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard and any other proceedings arising out of or connected therewith.
2. To sign, verify and file or withdraw all proceedings, petitions, appeals, affidavits and applications for compromise or withdrawal or for submission to arbitration of the said case, or any other documents, as may be deemed necessary or advisable by them for the conduct, prosecution or defence of the said case at all its stages.
3. To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of proceedings.

AND hereby agree:-

- a. That the Advocate(s) shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fee remains unpaid.

In witness whereof I/We have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this \_\_\_\_\_

Attested & Accepted by

Khaled Rehman,  
Advocate, Peshawar.

Signature of Executants

Before the KPK - Service Tribunal Pakistan

Appeal No. 492/2014

Zahoor-U-Din & others

v/s

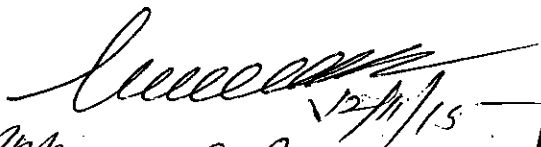
Govt. of KPK & others

Application.

Respectfully sheweth:-

- 1- That in the above mentioned appeal, the appellants did not make necessary points in the merit case
2. That presently Tech. Education Deptt. has been established with re-named and is working as KP-TEVTA. Technical Education & Vocational Training Authority.
- 3- That KP-TEVTA is under the Administrative control of Chairmanship honorable C.M. KPK vice Chairman and Managing Director. KP-TEVTA. (Being competent Authority)
- 4- That in the merit appeal, the counsel have not been made points so which is irrelevant.

Keeping in view of the above, it is therefore requested that the above appeal which have no force of law due to irregularities mentioned may be dismissed or the appellants may be directed to file fresh appeals with relevant necessary points to give proper reply in time.

  
12/11/15  
Muhammad Rasool  
Asstt. Director (Legal)  
KP-TEVTA

Before The KPH - Service Tribunal Bench

Appeal No. 492/2014

Zahoor-U-Din & Others

v/s

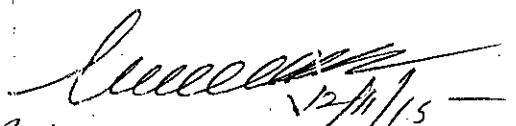
State of KPH & Others

Applicators.

Respectfully Sheweth:-

- 1- That in the above mentioned appeal, the appellants did not make necessary parties in the instant case.
2. That presently Tech. Education Deptt. has been established with re-named and is working as KP-TEVTA. Technical Education & Vocational Training Authority.
- 3- That KP-TEVTA is under the Administrative control of Chairmanship honorable C.M. KPH vice Chairman and Managing Director. KP-TEVTA (Being Competent Authority)
4. That in the instant appeal, the counsel have not been made parties so which is irrelevant.

Keeping in view of the above, it is therefore requested that the above appeal which have no force of law due to irregularities may be dismissed or the appellants may be directed to file fresh appeals with relevant necessary parties to give proper reply in time.

  
12/11/15  
Mahomed Rasool  
Asstt. Director (Legal)  
KP-TEVTA

Before the KPK - Service Tribunal Petitioner

Appeal No: 492/2014

Zahoor-U-Din & others

v/s

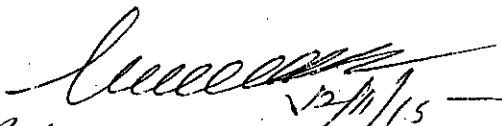
Govt. of KPK & others

Applicant(s)

Respectfully Sheweth:-

- 1- That in the above mentioned appeal, the appellants did not make necessary parties in the instant case
2. That presently Tech. Education Deptt. has been established with re-named and is working as KP-TEVTA. Technical Education & Vocational Training Authority.
- 3- That KP-TEVTA is under the Administrative Control of Chairmanship honorable C.M. KPK vice Chairman and Managing Director KP-TEVTA (Being Competent Authority)
- 4- That in the instant appeal, the counsel have not been made parties so which is irrelevant.

Keeping in view of the above, it is therefore requested that the above appeal which have no force of law due to irregularities may be dismissed or the appellants may be directed to file fresh appeals with relevant necessary parties to give proper reply in time.

  
27/11/15  
Muhammad Rasool  
ASST. Director (Legal)  
KP-TEVTA

Before The KPH - Service Tribunal Petitioner

Appeal No. 492/2014

Zahoor-U-Din & others

v/s

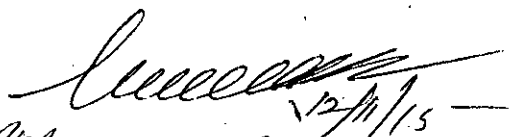
Govt. of KPH & others

Applicator

Respectfully Sheweth:-

- 1- That in the above mentioned appeal, the appellants did not make necessary parties in the instant case.
- 2- That presently Tech. Education Deptt. has been established with re-named and is working as KP-TEVTA. Technical Education & Vocational Training Authority.
- 3- That KP-TEVTA is under the Administrative Control of Chairmanship honorable C.M. KPH vice Chairman and Managing Director. KP-TEVTA (Being Competent Authority)
- 4- That in the instant appeal, the cases have not been made parties so which is irrelevant.

Keeping in view of the above, it is therefore requested that the above appeal which have no force of law due to irregularities mentioned may be dismissed or the appellants may be directed to file fresh appeals with relevant necessary parties to give proper reply in time.

  
12/11/15  
Mansurul Rasool  
Asstt. Director (Legal)  
KP-TEVTA

Before the KPK - Service Tribunal Bench

Appeal No. 492/2014

Zahoor-U-Din & others

v/s

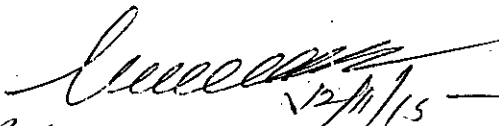
Govt. of KPK & others

Applicant

Respectfully Sheweth:-

- 1- That in the above mentioned appeal, the appellants did not make necessary points in the instant case.
2. That presently Tech. Education Deptt. has been established with re-named and is working as KP-TEVTA. Technical Education & Vocational Training Authority.
- 3- That KP-TEVTA is under the Administrative Control of Chairmanship honorable C.M. KPK vice Chairman and Managing Director KP-TEVTA (Being Competent Authority)
4. That in the instant appeal, the counsel have not been made parties so which is irrelevant.

Keeping in view of the above, it is therefore requested that the above appeal which have no force of law due to irregularities may be dismissed or the appellants may be directed to file fresh appeals with relevant necessary parties to give proper reply in time.

  
12/11/15  
Mahmud Rasool  
Agent: Durrani (Legal)  
KP-TEVTA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1116 /2014

Zahoor-ud-Din .....Appellant

Versus

The Govt. and others.....Respondents

**REPLICATION**

Respectfully Sheweth,

**Preliminary Objections:**

- I. That the application has been filed by an incompetent authority hence not maintainable.
- II. That the Khyber Pakhtunkhwa Technical Education and Vocational Training Agency constituted vide Notification dated 17.04.2014 pursuant to Section-4 of the Ordinance of 2002 has nothing to do with the instant issue, hence the application is misconceived.

**Facts:**

1. Misconceived. The necessary parties i.e. Respondent No.1 & 2 as well as the Private Respondents have been arrayed in the panel of Respondents, no other party is relevant for the purpose of disposal of this case.
2. Incorrect. The establishment of the Khyber Pakhtunkhwa TEVTA has nothing to do with the service matter purely relating to the establishment of the Department.
3. Irrelevant as explained hereinabove.
4. Incorrect hence denied.

It is, therefore, humbly prayed that the application being misconceived be rejected.

Through

Appellant

Khaleed Rahman  
Advocate,

Supreme Court of Pakistan

Dated: \_\_\_\_/02/2016

**Verification**

Verified, as per the instructions of my client that the contents of the application are true and correct.

By Counsel

FORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 492 /2014

Zahoor-ud-Din .....Appellant  
Versus  
The Govt. and others.....Respondents

**REPLICATION**

Respectfully Sheweth,

**Preliminary Objections:**

- I. That the application has been filed by an incompetent authority hence not maintainable.
- II. That the Khyber Pakhtunkhwa Technical Education and Vocational Training Agency constituted vide Notification dated 17.04.2014 (*Annex:-A*) pursuant to Section-4 of the Ordinance of 2002 has nothing to do with the instant issue, hence the application is misconceived.

**Facts:**

1. Misconceived. The necessary parties i.e. Respondent No.1 & 2 as well as the Private Respondents have been arrayed in the panel of Respondents, no other party is relevant for the purpose of disposal of this case.
2. Incorrect. The establishment of the Khyber Pakhtunkhwa TEVTA has nothing to do with the service matter purely relating to the establishment of the Department.
3. Irrelevant as explained hereinabove.
4. Incorrect hence denied.

It is, therefore, humbly prayed that the application being misconceived be rejected.

Through

Appellant

Khalid Rahman

Advocate,

Supreme Court of Pakistan

Dated:      /02/2016

**Verification**

Verified, as per the instructions of my client that the contents of the application are true and correct.

Counsel



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 492 /2016

Zahoor-ud-Din

The Govt. and others

Versus

.....Appellant

.....Respondents

INDEX

S.No.	Description of Documents	Date	Annexure	Pages
1.	Memo of Service Appeal			1-4
2.	Initial appointment letter	15.11.1988	A	5-6
3.	Appointment order	13.04.1991	B	0-7
4.	Extracts from the Service Book		C	8-12
5.	Provisional Seniority List	07.05.2012	D	13-17
6.	Impugned Notification/ Seniority List	23.04.2013	E	18-22
7.	Departmental Representation	09.12.2013	F	0-23
8.	Letter from the Skill Development Centre, Bajaur	21.05.1991	G	0-24
9.	Wakalat Nama			

Through

Appellant  
**Khaled Rahman**  
Advocate,  
Supreme Court of Pakistan  
301 Haroon Mansion,  
Khyber Bazar, Peshawar  
Cell # 0545-9337312

Dated: 01 /06/2016

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal No. \_\_\_\_\_/2014**

Zahoor-ud-Din  
Instructor (Electrical),  
Govt. Technical Vocational Centre,  
Ghazni Khel, Lakki Marwat.....Appellant

Versus

1. The Khyber Pakhtunkhwa Technical Education & Vocational Training Authority (TEVTA), Peshawar through its Chairman.
2. The Managing Director/Vice-Chairman, Khyber Pakhtunkhwa Technical Education & Vocational Training Authority (TEVTA), Peshawar.
3. The Govt. of Khyber Pakhtunkhwa through Secretary Industries, Technical Education & Manpower Training, Civil Secretariat, Peshawar.
4. The Director General, Technical Education & Manpower Training, Khyber Pakhtunkhwa, Benevolent Fund Building, Peshawar Cantt.
5. Mr. Bashir Ahmad, Senior Instructor (Electrical) (BPS-17), Govt. Technical Vocational Centre (B), D.I.Khan.
6. Mr. Tariq Jan, Instructor (Electrical) Govt. Technical Vocational Centre (B), D.I.Khan.....Respondents

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**AMENDED SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION/SENIORITY LIST DATED 23.04.2013 COMMUNICATED ON 07.12.2013 VIDE WHICH**

RESPONDENT NO.5&6 BEING JUNIORS TO THE APPELLANT WERE PLACED SENIOR TO THE APPELLANT IN VIOLATION OF THE LAW AGAINST WHICH APPELLANT PREFERRED A DEPARTMENTAL REPRESENTATION TO THE APPELLATE AUTHORITY ON 09.12.2013 BUT THE SAME WAS NOT DISPOSED OF WITHIN THE STATUTORY PERIOD OF 90 DAYS.

---

**PRAYER:**

On acceptance of the instant appeal, the impugned Notification/Seniority List dated 23.04.2013 may graciously be modified by placing the appellant senior to the Respondent No.5&6 being junior to the appellant.

---

Respectfully Sheweth,

Facts giving rise to the present appeal are as under:-

1. That appellant is the employee of Technical Education & Manpower Training Department, Khyber Pakhtunkhwa serving as Instructor (Electrical) (BPS-14). He initially joined the service as Instructor (Electrical) (BPS-14) vide appointment letter dated 15.11.1989 (**Annex:-A**) and thereafter, vide order dated 13.04.1991 (**Annex:-B**) he was adjusted as Instructor (Electrical) after observing all the codal formalities. (Extracts from the Service Book **Annex:-C**).
2. That vide letter dated 07.05.2012 (**Annex:-D**) provisional Seniority List of Instructor (BPS-14) was circulated wherein appellant was correctly placed at Serial No.16 whereas Respondents No.5&6 were shown at Serial No.17 & 19 but

thereafter vide impugned Notification/Seniority List dated 23.04.2013 (**Annex:-E**) communicated on 07.12.2013, Respondents No.5&6 have been placed at Serial No.3&5 while appellant being senior has been shown at Serial No.7 in violation of the law and rules.

3. That being aggrieved of the impugned Notification/Seniority List *ibid*, appellant challenged the same through Departmental Representation on 09.12.2013 (**Annex:-F**) through proper channel but the same has not been disposed of within the statutory period of 90 days, hence this appeal *inter-alia* on the following grounds:-

**Grounds:**

- A. That Respondents have not treated appellant in accordance with law, rules and policy on subject and acted in violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973 and unlawfully issued the impugned Notification/Seniority List, which is unjust, unfair and hence not sustainable in the eye of law.
- B. That the impugned Notification/Seniority List is in violation of Section-8 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-17 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, hence the same is liable to be struck down.
- C. That Respondents No.5&6 are established juniors to the appellant and they were illegally shown as senior to the appellant in the impugned

Notification/Seniority List. It is pertinent to mention here that Respondent No.5 (Muhammad Bashir) was appointed on the post vacated by the appellant as is evident from the letter dated 21.05.1991 (Annex:-G).

- D. That Respondent No.5&6 have never challenged the seniority position of the appellant and have therefore acknowledged the appellant as senior to them, therefore, the issue of seniority amongst the appellant and Respondent No.5&6 has attained finality and cannot be reopened abruptly.
- E. That appellant has been condemned unheard as he has been deprived of his valuable rights without informing him or providing him opportunity of hearing, therefore, the impugned Notification/Seniority List is against the principle of natural justice and thus not maintainable.
- F. That appellant would like to offer some other grounds during the course of arguments.

It is, therefore, humbly prayed that the instant appeal may graciously be accepted as prayed for above.

Any other relief as deemed appropriate in the circumstances of case not specifically asked for, may also be granted to appellant.

Through

Appellant

Khaled Rahman,  
Advocate, Peshawar

Dated: 01/06/2016

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

**Service Appeal No. 492/2016**

Zahoor-ud-Din

VS

Govt: of KPK.

.....

**REPLY ON BEHALF OF RESPONDENT NO.5**

.....

**RESPECTFULLY SHEWETH:**

**Preliminary Objections:**

1. The appellant has no locus standi and cause of action.
2. The appellant has not come with clean hands.
3. The appeal is time barred.
4. The appeal is not maintainable.
5. The appeal is bad for non-joinder and misjoinder of necessary parties.
6. That the replying respondent No.5 was senior to the appellant as respondent No. 5 regularized in 1990 while the appellant was regularized in 1993, therefore the respondent No. 5 was placed above the name of appellant in rectified seniority list.

**FACTS:**

1. Pertain to record. Moreover, this para does not relate to replying respondent No.5.
2. Incorrect hence denied. The department circulate the provisional Seniority list of 2011 in which the private respondent No.5 was wrongly placed at Serial No. 19, as the seniority list of 2011 was prepared on basis of initial appointment and not from the date of regularization of the posts, whereas the seniority is always counted from the date of regularization of posts, therefore respondent No. 5 filed application for the correction of ~~provisional~~ seniority list of 2011, as the private respondent No.5 was appointed in 1989 and regularized in 1990 while the appellant was appointed in

1988 while regularized in 1993 and on his objection, the department made seniority list from the date of regularization of post and issued tentative seniority list in which the appellant was correctly placed at serial No. 14 on which the appellant did not take any action on tentative seniority list of 2011 in time and which promotion was also made from serial No. 1 to 11 on that seniority list. It is also added that even the appellant has not challenged the seniority list of 2014 in which he has been shown junior to the replying respondents. (Related documents are attached as Annexure-R-1)

3. Pertain to record. This para does not relate to replying respondent No.5. However the appellant has no cause of action as he was correctly placed in the tentative seniority list of 2011 and 2012. More over the present appeal is barred by time and nothing has been annexed with the appeal about the receipt of said seniority list on a particular date.

#### **GROUND:**

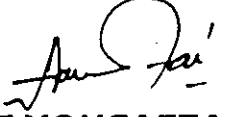

- A. Incorrect. The respondents have treated appellant in accordance with law, rules and policy on subject, and not violated Article-4 of the Constitution of Islamic Republic of Pakistan, 1973 and issued the seniority list according to law which is just fair and hence sustainable.
- B. Incorrect. The respondents have issued seniority list according to Sec-8 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-17 of Khyber Pakhtunkhwa Civil Servants (APT) Rules, 1989, hence the same is liable to be maintained.
- C. Incorrect. The respondent No. 5&6 were seniors to the appellant, but the appellant was shown senior to respondents No.5&6 in ~~provisional~~ seniority list which was rectified after objection of respondent No.5 on that seniority list and correctly placed the appellant as well as respondent No. 5&6 in that seniority lists. Moreover the respondent No.5 was not appointed on the post vacated by the appellant but he was adjusted on the post of the appellant as the appellant was appointed in 1989 and the said mentioned post was vacated in 1991. (copy attached) is attached as Annexure-R-2.

- D. Incorrect. Detail reply has been given in para 2 of the reply.
- E. Incorrect. Hence denied.
- F. The respondents No.5 also seeks permission to provide other grounds and proofs at the time of arguments.

It is therefore, most humbly prayed that the instant appeal may be dismissed with cost.

**Respondent No.5**

Through:

  
(M. ASIF YOUSAFZAI )  
ADVOCATE SUPREME COURT  
&   
(TAIMUR ALI KHAN)  
ADVOCATE HIGH PESHAWAR.

**AFFIDAVIT**

It is affirmed and declared that the contents of reply are true and correct to the best of my knowledge and belief and nothing has been concealed from the Hon'able Tribunal.

  
DEPONENT



091-9213027



GOVERNMENT OF KHYBER PAKHTUNKHWA  
DIRECTORATE GENERAL TECHNICAL EDUCATION  
& MANPOWER TRAINING, PESHAWAR  
BENEVOLENT FUND BUILDING PESHAWAR CANTT

Registered

R-1 (B)

No. DGTE&MT/Estt-II/Seniority/B-14/ 2760

Dated 7/5/2012

To

The Principal,

Government Technical  
and Vocational Centre D-1-Khan

2011  
Handwritten signature

Subject:

PROVISIONAL SENIORITY LISTS OF INSTRUCTOR (BPS-14) AT GOVERNMENT  
TECHNICAL AND VOCATIONAL TRAINING CENTRES

Enclosed please find herewith-provisional seniority lists of Instructor (BPS-14) of your center as updated up to 31-12-2011.

The same may please be circulated amongst the ELECTRICAL staff of your center. A copy duly signed by the respective officials along with objections, if any, may be returned to this office within 30 days of the issuance of this letter.

No objection will be entertained after the expiry of prescribed date.

Handwritten signature

ASSISTANT DIRECTOR (ADMIN)

37

11/5/2012

Handwritten notes on the left margin: H/c, H/c, 11/5/12

PROVISIONAL SENIORITY LIST OF INSTRUCTOR (ELECTRICAL TRADE) (EPS-14) GTVC'S STREAM IN THE DEPARTMENT OF THE TECHNICAL EDUCATION AND MANPOWER TRAINING DEPARTMENT. (AS STOOD ON 31-12-2011)

S.No	Name of incumbent with Academic qualification	Date of Birth & Domicile	Date of 1 <sup>st</sup> entry into Govt. Service	Regular appointment Date	Promotion to the post present post		
					EPS	Method of recruitment Appointment	Seniority
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
01	Mr. Moina Khan i) B.A. ii) G-III level Certificate from NTE is attached. iii) 3 Months Instructor Training Course. iv) 18 Months TPC	05-01-1951 Swat	01-01-1966	01-01-1966	14	By way of absorption appointment as Instructor 01-01-1998	
02	Mr. Muhammad Iqbal i) B.A. ii) G-III level Certificate from NTE is attached. iii) 3 Months TPC iv) 1 year Instructor Training Course v) BSCC, Expt. 3, Govt. Computer College	15-02-1958 Abbottabad	01-01-1966	01-01-1966	14	By way of absorption appointment as Instructor 01-01-1998	
03	Mr. Ezzatullah i) Matric ii) G-III level Certificate from NTE is attached. iii) 3 Months TPC	15-03-1954 Muz	01-01-1966	01-02-1966	14	By way of absorption appointment as Instructor 01-02-1998	
04	Mr. Khalid Khan i) B.A. ii) G-III level Certificate from NTE is attached. iii) 3 Months TPC iv) 1 year Instructor Training Course from Karachi. v) 3 Months TPC vi) Advance Training from IPR, China	11-03-1951 D.I. Khan	15-10-1964 EPS-4	01-03-1966	14	By way of absorption appointment as Instructor 01-03-1998	
05	Mr. Muhammad Iqbal Khan i) Matric. ii) 3 years D.A.E. iii) 3 Months Instructor Training Course	31-08-1952 D.I. Khan	21-05-1966	21-05-1966	14	By way of recruitment 01-05-1998	
06	Mr. Muhammad Iqbal Khan i) Matric. ii) 3 years D.A.E. iii) 1 Year Industrial Training Course iv) 3 Months Advance Training from IPR, China	25-08-1950 D.I.	04-10-1967	04-10-1967	14	By way of absorption appointment as Instructor 01-02-1998	
07	Mr. Ghulam Abbas i) Matric. ii) 3 Years D.A.E. iii) 3 Months Instructor Training Course	15-03-1955 Mardan	18-04-1968	18-04-1968	14	By way of absorption appointment as Instructor 01-02-1998	
08	Mr. Sabz Ali i) B.A. ii) G-III level Certificate from NTE is attached. iii) 18 Months TPC iv) 3 Months Instructor Training Course	20-11-1952 Peshawar	20-04-1968	20-04-1968	14	By way of absorption appointment as Instructor 01-02-1998	
09	S. Saifud Hussain i) Matric. ii) 3 Years D.A.E. iii) 3 Months Instructor Training Course	20-05-1954 D.I. Khan	23-04-1968	23-04-1968	14	By way of absorption appointment as Instructor 01-02-1998	

Handwritten signature and date: 11/1/2012

10	Mr. Shafiq Ullah i) Matric ii) 18 Months TPC	21-10-1963 Bannu	03-05-1963	03-05-1963	14	By way of absorption as Instructor 01-02-1963
11	Mr. Shah Zada Khan i) B.A. ii) 3 Years D.A.E. iii) 1 Year Instructor Training Course.	12-04-1964 Haripur	04-05-1963	04-05-1963	14	By way of absorption as Instructor 01-02-1963
12	Mr. Saeed Ahmad Khan i) B.A. ii) 18 Months TPC in Electrical iii) 6 Months Instructor Training Course.	13-02-1964 Haripur	21-07-1963	21-07-1963	14	By way of absorption as Instructor 01-02-1963
13	Mr. Manzoor Hayat i) B.A. ii) 18 Months TPC iii) Certificate of Competency Elect. supervisor AECOD iv) 1 Year Instructor Training Course.	12-03-1962 Sialkot	01-05-1963	01-09-1963	14	By way of recruitment as instructor 31-07-1963
14	Mr. Ishaq Ahmad i) B.A. ii) 3 Years D.A.E. iii) 6 Months Instructor Training Course	25-04-1963 Chasabota	25-05-1963	05-09-1963	14	By way of absorption as Instructor 01-02-1963
15	Mr. Bashir Ali i) Matric ii) 3 Years D.A.E. iii) 6 Months Instructor Training iv) competency certificate	25-01-1963 Sialkot	15-07-1963	15-02-1963	14	By way of recruitment 01-02-1963
16	Mr. Zahoor Ud Din i) Matric ii) 3 Years D.A.E.	13-10-1963 Bannu	13-01-1963	12-02-1963	14	By way of recruitment as instructor 31-07-1963
17	Mr. Farid Jafar i) Matric ii) 3 Years D.A.E.	10-03-1963 Bannu	01-07-1963	01-07-1963	14	By way of recruitment as instructor 01-02-1963
18	Mr. Shafiq Ullah i) Matric ii) 3 Years D.A.E.	05-03-1963 Bannu	01-07-1963	01-07-1963	14	By way of recruitment as instructor 31-07-1963
19	Mr. Basir Ahmad i) B.A. ii) 18 Months TPC iii) 1 Year TPC in (Auto)	13-03-1967 Bannu	01-07-1963	01-07-1963	14	By way of absorption as instructor 01-02-1963
20	Mr. Muhammad Ajmal i) F.A. ii) 2 Years TPC iii) 6 Months Instructor Training Course iv) 5 Months Advance Training from (P.R. CHINA)	30-05-1963 Manshera	29-08-1963	29-03-1963	14	By way of recruitment as instructor 31-07-1963
21	Mr. Muhammad Jamil i) Matric ii) 18 Months TPC iii) 6 Months Instructor Training Course iv) C-11 TPC	10-05-1963 Abbottabad	12-05-1963	14-05-1963	14	By way of recruitment as instructor 31-07-1963

22	Muhammad Ibrahim i) M.A.L.L.S. ii) 2 Years TPC iii) 06 month Inst. Trng. Course	15-08-1960 Karak	17-08-1992	17-08-1992	14	By Initial recruitment as instructor. 31-07-1992
23	Muhammad Ayaz Khan i) B.A. ii) 3 Years D.A.E. competency Certificate Elect. iii) 6 Months Instructor Training Course.	01-07-1957 Peshawar	30-08-1992	30-08-1992	14	By Initial recruitment as instructor. 31-07-1992
24	Mr. Fakhru Zaman i) Metric ii) G-II level Certificate from NTE Islamabad iii) 1 Year TPC iv) Trade Diploma Electrical (VTP) GCT. v) 6 Month Instructor Training Course	01-08-1952 Swabi	As Supdt. 1992 (EPS-9)	14-08-1992 (EPS-14)	14	By Initial recruitment as instructor. 31-07-1992
25	Mr. Mohamed Nawaz i) D.A.E. Electrical	Swabi	01-08-1999	01-08-1999	14	Initial
26	Mr. Fandi Khan i) Electrical Supervisor ii) 350 Hours Electrical Course	14-03-1955 Peshawar	14-12-1977	01-02-2002	14	Transfer
27	Mr. Nazeer Mohammad i) Metric ii) 02 years Certificate	01-01-1956 Abbottabad	27-04-1997	18-07-2002	14	Transfer
28	Mr. Rasool Khan i) P.A. ii) 02 years Certificate in electronics iii) competency certificate	09-01-1955 Nowshera	18-12-1997	18-07-2002	14	Transfer
29	Mr. Abdul Hamid i) Metric ii) 02 years Certificate iii) 06 months Certificate	02-04-1951 D.I. Khan	18-07-1994	18-07-2002	14	Transfer
30	Syed Mahmood Shah i) MA Pushto ii) 01 year Certificate Electrical iii) Electrical Certificate (ABCD)	15-07-1957 Mardan	18-03-1995	25-07-2004	14	Transfer
31	Mr. Saqib Shah i) Metric ii) 02 years Certificate	09-01-1964 Peshawar	18-03-1995	25-05-2004	14	Transfer
32	Mr. Gul Muhammad ( cadre changed ) i) M.A. ii) D.A.E. (Electrical)	22-02-1973 Karak	23-07-2002	27-04-2005	14	Initial
33	Mr. Junaid Ur Rehman DAE Electrical	12-02-1965 Charsadda	27-04-2005	27-04-2006	14	Initial
34	Mr. Saad Aslam i) Metric ii) 2 year Certificate	01-01-1953 Haripur	08-1993	05-06-2005	14	Initial
35	Mr. Inam Ullah i) B.A. ii) D.A.E. Electrical	17-05-1950 Charsadda	10-11-1992	15-05-2005	14	Initial
36	Mr. Das Muhammad ( cadre changed ) i) Metric ii) D.A.E. (Electrical)	01-03-1972 Karak	11-07-1997	01-06-2005	14	Initial

37	Mr. Rasool Gul i) Matric, ii) DAE (Electrical)	07-02-1974 Sarnu	03-04-2007	03-04-2007	14	India
38	Mr. Farooq Saad i) BA, ii) DAE	25-07-1970 Dir (L)	17-04-2007	17-04-2007	14	India
39	Mrs. Zehra Matric ii- 02 years Certificate	01-09-1950 Mardan	01-01-1998	11-12-2007	14	Promotion
40	Mr. Abdul Shaniq i) Matric ii- 02 years Certificate	15-04-1958 Kohat	24-01-1998	11-12-2007	14	Promotion

Note: Seniority of the officials at S NO. (1 to 4) has been determined on the basis of their date of appointment.

ASSISTANT DIRECTOR GENERAL

Phone: 091-9213027



GOVERNMENT OF KHYBER PAKHTUNKHWA  
DIRECTORATE GENERAL TECHNICAL EDUCATION  
& MANPOWER TRAINING, PESHAWAR  
BENEVOLENT FUND BUILDING PESHAWAR CANTT

NOTIFICATION.

No.DTE&MT/Seniority/A-103 In exercise of the powers conferred under Sub-Section (1) of Section-B of the Khyber Pakhtunkhwa Civil Servant Act, 1973 Khyber Pakhtunkhwa, Act No.XVIII of 1973), the Final Seniority List (As Stood on 31-12-2011) of Instructor (Electrical) BPS-14 GTVC in the Directorate General of Technical Education & Manpower Training, Khyber Pakhtunkhwa, Peshawar is hereby notified for information of all concerned (list attached).

DIRECTOR GENERAL

Endst: No.DGTE&MT/Seniority/A-103/ 3885(2) Dated 19/12/2012

Copy for information and necessary action to:-

- 1- The Principal GTVC's concerned.
- 2- Office copy.

ATTEST

ASSISTANT DIRECTOR  
Directorate General  
Technical Education  
& Manpower Training  
Peshawar

DEPUTY DIRECTOR (ADMN)

(2)

LIST OF INSTRUCTORS (ELECTRICAL TRADE) (BPS-14) GTVCs STREAM IN THE DEPARTMENT OF THE TECHNICAL EDUCATION AND MANPOWER TRAINING DEPARTMENT. (AS STOOD ON 31-12-2011)

(1)	(2) Name of incumbent with Academic qualification	(3) Date of Birth & Domicile	(4) Date of 1 <sup>st</sup> entry into Govt Service.	Regular appointment:		Promotion to the post present post	Remarks
				(5) Date	(6) EPS		
01	Mr. Momin Khan i) B.A. ii) G-II level Certificate iii) 5 Months Instructor Training Course iv) 18 Months TPC	05-01-1957 Swat	21-12-1936	01-01-1986	14	By way of absorption/adjustment as Instructor	
02	Mr. Muhammad Jazir i) B.A. ii) G-II level Certificate from NTB Islamabad. iii) 18 Months TPC. iv) 1 Years Instructor Training Course	15-02-1953 Haripur	21-12-1935	01-01-1986	14	By way of absorption/adjustment as Instructor	
03	Mr. Saeed Ullah Jan i) Matric ii) G-II level Certificate from NTB Islamabad. iii) 18 Months TPC iv) 06 months Instructor Training Course	15-03-1954 Karak	01-02-1936	01-02-1986	14	By way of absorption/adjustment as Instructor	
04	Mr. Mashiat Ullah i) F.A. ii) 18 Months TPC iii) 6 Months Inst. Trg Course from Karachi. iv) 6 Months Inst. Trg Course from STI, Peshawar v) 5 Months Advance Training from (PR, CHINA)	11-03-1953 D.I Khan	15-10-1934 BPS-01	01-03-1986	14	By way of absorption/adjustment as Instructor	
05	Mr. Mohammad Nadeem Khan i) Matric. ii) 3 Years D.A.E iii) 5 Months Instructor Training Course.	31-03-1952 D.I Khan	21-05-1936	21-05-1986	14	By Initial recruitment	
06	Mr. Mohammed Iqbal Khan i) Matric ii) 3 Years D.A.E. iii) 1 Years Instructor Training Course. iv) 5 Months Advance Training from (PR, CHINA)	25-03-1950 D.I	04-10-1937	01-02-1990	14	By way of absorption/adjustment as Instructor	

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2011

3

	Mr. Ghulam Yousaf B) B.A. 3 Years D.A.E. C) 5 Months Instructor Training Course	15-03-1955 Mardan	15-04-1958	01-02-1990	14	By way of absorption/adjustment as Instructor
08	Mr. Saibz Ali B) B.A. C) G-II level Certificate from NTE Islamabad. D) 12 Months TPC E) 5 Months Instructor Training Course.	20-11-1952 Peshawar.	20-04-1958	01-02-1990	14	By way of absorption/adjustment as Instructor
09	S. Sajid Hossain B) B.A. 3 Years D.A.E. C) 5 Months Instructor Training Course.	20-05-1954 D.I. Khan.	23-04-1958	01-02-1990	14	By way of absorption/adjustment as Instructor
10	Mr. Shafiq Ullah B) B.A. C) 12 Months TPC	21-10-1954 Bannu	03-05-1958	01-02-1990	14	By way of absorption/adjustment as Instructor
11	Mr. Shah Zada Khan B) B.A. 3 Years D.A.E. C) 1 Years Instructor Training Course.	12-04-1954 Hanpur	04-05-1958	01-02-1990	14	By way of absorption/adjustment as Instructor
12	Mr. Saad Ahmad Khan B) B.A. 3 Years D.A.E. C) 15 Months TPC in Electrical. D) 5 Months Instructor Training Course.	13-02-1954 Hanpur	21-07-1958	01-02-1990	14	By way of absorption/adjustment as Instructor
13	Mr. Ishfaq Ahmed B) B.A. 3 Years D.A.E. C) 5 Months Instructor Training Course.	25-04-1955 Charsadda	05-05-1958	01-02-1990	14	By way of absorption/adjustment as Instructor
14	Mr. Bashir Ahmad. B) B.A. C) 12 Months TPC. D) 1 Years TPC in (Auto)	13-03-1957 Bannu	25-08-1958	16-02-1990	14	By way of absorption/adjustment as Instructor
15	Mr. Bashir Ali B) B.A. 3 Years D.A.E. w/ 5 Month Instructor Training w/ competency certificate	25-01-1955 Swabi	16-02-1958	16-02-1990	14	By Initial recruitment

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*Handwritten text: 12 Months*

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16	Mr. Farid Mir M.A. (C) 3 Years D.A.E. 03 months Inst. Traig Course	10-03-1962 Bannu	10-12-1988	01-07-1991	14	By way of absorption/adjustment as Instructor
17	Mr. Manzoor Hayat B.A. (I) 18 Month TPC Certificate of Competency Elect. supervisor ABCD of 1 Year Instructor Training Course	12-03-1962 Swabi	01-09-1988	31-07-1993	14	By way of absorption/adjustment as Instructor
18	Mr. Zahoor De De M.A. (C) 3 Years D.A.E.	12-10-1964 Bannu	14-04-1991	31-07-1993	14	E, Initial recruitment
19	Mr. Shaqiq Ullah M.A. (C) 3 Years D.A.E. 05 months Inst. Traig Course	09-05-1967 Bannu	01-07-1991	31-07-1993	14	E, Initial recruitment
20	Mr. Muhammad Ayub F.A. 2 Years TPC 5 Months Instructor Training Course of 5 Months Advance Training from (P.R. CHINA)	10-05-1968 Mansehra	25-08-1991	31-07-1993	14	E, Initial recruitment
21	Mr. Muhammad Jamil M.A. (C) 10 Months TPC 5 Months Instructor Training Course G-II TPC	10-05-1969 Abbottabad	14-05-1992	31-07-1993	14	E, Initial recruitment
22	Munammad Ibrahim M.A. (C) 2 Years TPC 18 month Inst. Traig Course	15-09-1969 Kafak	17-09-1992	31-07-1993	14	E, Initial recruitment
23	Munammad Ayyaz Khan B.A. 3 Years D.A.E. competency Certificate (Electrical) 5 Months Instructor Training Course	01-07-1967 Peshawar	30-08-1992	31-07-1993	14	E, Initial recruitment

ASSISTANT DIRECTOR  
Directorate Technical Education  
Mangowal Training, Khy. Peshawar

11

24	i) Metric ii) G-II level Certificate from NITP Islamabad iii) 1 Year TPC iv) Trade Diploma Electrical (V.T.P) G.C.T. v) 6 Month Instructor Training Course.	Swabi	n. Support (BPS-5) 14-09-1992 (BPS-14)			
25	Mr. Mohammad Nawab D.A.E Electrical	Swabi	01-06-1999	01-06-1999	14	By Initial recruitment
26	Mr. Faridullah i) Electrical Supervisor ii) 350 Hours Electrical Course	14-03-1955 Peshawar	14-12-1977 (BPS-06) 01-02-1990 (BPS-10) 01-02-2002 (BPS-14)	01-02-2002	14	By Promotion
27	Mr. Nazir Mohammad i) Metric ii) 02 years Certificate	01-01-1956 Abbottabad	27-04-1990 BPS-10	19-07-2002	14	By Promotion
28	Syed Manzoor Shah i) MA Pushtun ii) 01 year Certificate Electrical iii) Electrical Certificate (ABCD)	15-07-1957 Mardan	24-04-1980 (BPS-06) 27-03-1990 (BPS-10) 19-07-2002 (BPS-14)	19-07-2002	14	By Promotion
29	Mr. Abdur Hamid i) Metric ii) 02 years Certificate iii) 06 months Certificate	02-04-1961 D. Khan	15-03-1984 (BPS-10)	19-07-2002	14	By Promotion
30	Mr. Razimullah i) FA ii) 02 years Certificate in electrician, iii) competency certificate	09-01-1955 Nowshera	18-12-1985 (BPS-10)	19-07-2002	14	By Promotion
31	Mr. Saad Shah i) Metric ii) 02 years Certificate	06-01-1964 Peshawar	19-03-1986 (BPS-10)	26-05-2004	14	By Promotion
32	Mr. Usaid Ur Rehman D.A.E Electrical	12-02-1955 Charsadda	27-04-2006	27-04-2006	14	By Initial recruitment
33	Mr. Sher Aslam i) Metric ii) 2 year Certificate	01-01-1963 Haripur	30-03-1993 (BPS-06) 05-05-2006 (BPS-14)	05-05-2006	14	By Promotion

	17-05-1960 Charsadda	10-11-1990 (BPS-06) 2002 (BPS-10) 15-05-2006 (BPS-14)	15-05-2006	14	By Promotion
35	Mr Farooq Saif D) BA, B) DAE	25-07-1970 Dr (L)	1993 (BPS-06) 17-04-2007 (BPS-14)	17-04-2007	14 By Promotion
36	Muhs. Zeb Metric & 02 years Certificate	01-08-1950 Mardar.	01-01-1992 (BPS-10) 11-12-2007 (BPS-14)	11-12-2007	14 By Promotion
37	Mr. Abdul Shami D) Metric & 02 years Certificate	18-04-1958 Kohat	24-01-1990 (BPS-10) 11-12-2007 (BPS-14)	11-12-2007	14 By Promotion
38	Mr. Zahid Saeed D) Metric B) DAE Electrical	01-04-1980 Abbottabad	25-01-2012	25-01-2012	14 By Initial recruitment

Note: Certified that the Seniority is final/un-disputed and not sub Judiced

*W. S. S. S.*  
ASSISTANT DIRECTOR (AD-III)  
Directorate Technical Education &  
Manpower Training, KP, Peshawar

**ATTESTED**

*[Signature]*  
DEPUTY DIRECTOR (AD-III)

12

Government of N.W.F.P.  
Directorate of Manpower & Training  
Benevolent Fund Building Hall Nos.  
210-11 Saddar Road, Peshawar Cantt:

No. DMT/SDC/Estt/4031

Dated, 19th August, 1989.

To

Mr. Dushin Ahmad B/O Mr. Faicullah Khan  
Village P.O. Abba Tehsil Lakki Marwat  
District Pindi.

LETTER ORDER OF APPOINTMENT.

You are hereby appointed as Instr(Elects) in BPS- 14  
(Scale as per Govt. of NWFP) with usual allowances as  
prescribed under the rules in Skill Development Centre Darwah  
District Central on the following terms and conditions:-

- i) The appointment is subject to clearance by the Departmental Selection Committee of the Directorate.
- ii) the post is temporary and non pensionable but likely to become regular and pensionable.
- iii) the appointment under the Skill Development Programme will be on purely temporary basis and will last till the continuity of the programme.
- iv) the appointment will be liable to termination at any time without assigning any reasons. In case you wish to resign at any time, 14 days notice will be necessary or in lieu thereof 14 days pay will be forfeited.
- v) the appointment will be further subject to:-
  - a) the production of a certificate of medical fitness from the Civil Surgeon/Medical Supdt: concerned;
  - b) the production of original educational Degree/ certificates, domicile and experience certificates and National Identity Card.
  - c) the satisfactory verification of your character and antecedents by the concerned Police; and
  - d) the production of (i) a certificate of character from the Principal academic officer of the Academic Institution last attended and (ii) certificates of character from two responsible persons, not being your relatives, who are well acquainted with your character and antecedents. This condition will not apply if you are already in Government service.
- vi) You will have to join duties at your own expense.
- vii) You will be liable to transfer any where in NWFP in the public interest during your service in the

2) If the appointment is acceptable to you on the above terms/conditions, please convey your acceptance in writing on the enclosed form and report to the Training Manager Skill Development Centre, \_\_\_\_\_ on or before \_\_\_\_\_ failing which it will be presumed that you are not interested in the job and as such the offer will be treated as withdrawn.

Sd/-  
(Sikandar Ali Khan)  
Director

.....  
Endst: No. DMT/EOC/Estt/4031/ \_\_\_\_\_ Dated, \_\_\_\_\_  
Copy for information and necessary action to:-

- 1) The Assistant Director (Budget & Accounts) Directorate of Manpower & Training NWFP, Peshawar.
- 2) The Assistant Director (Technical) Directorate of Manpower and Training NWFP, Peshawar.
- 3) The Training Manager, Skill Development Centre \_\_\_\_\_ He is requested to take the following action:-

- i) On arrival of the appointee for duty, he may be taken on the strength under intimation to this Directorate.
- ii) Complete the formalities mentioned in sub para-V of para-1 above. After the needful is done, compliance may be reported to this Directorate.
- iii) An undertaking in the enclosed form may be obtained from the appointee and a copy thereof be sent to us for record.
- iv) Personal file of the appointee.

(Abdul Qayum Safi)  
Asst: Director (Admn)

(13)

H. L. F. P.  
NO. 100  
D. 10/11/77

Whereas the Seven Skill Development centres, one each at ... (Mardan), ... (Shirani), ... (Bannu) Kulachi (D.I. Khan) were financed by the Federal Government in the Ministry of Science, Culture & Youth affairs as a Developmental Project for the period for and upto 31.1.1990 and whereas the posts in existence in these centres were created by the Provincial Government in Finance Department on Provincial consolidated fund w.e.f. 1.2.1990 vide Finance Department letter No. Q(AS)1-13/89-90 dated 19.5.1990.

Now therefore, the following incumbents of these posts are allowed to ~~draw pay~~ <sup>draw</sup> against their respective posts provisionally with effect from ~~1st March, 1990~~ <sup>1st March, 1990</sup> pending their regular absorption on these posts by the Provincial Government.

SKILL DEVELOPMENT CENTRES

<u>Nomenclature of post</u>	<u>Name of Incumbent</u>
1. Manager	Vacant
2. Senior Instructor(Auto)	Fakhrul Jalal
3. Senior Instructor(Elect) ✓	Mohammad Iqbal
4. Instructor(Elect)	Mohammad Idrees
5. Instructor (Auto)	Mustaz Ali Shah
6. Instructor(Carpenter)	Poorul Akbar
7. Instructor(Mailprint)	Ghulam Sattar
8. Asstt/Asstt.	Mohammad Ashraf
9. Storekeeper	Amal Khan.
10. Junior Clerk	Amal Ali
11. Workshop attendant	Mirza Mohammad Khan
12. -do-	Mirza Ali.
13. -do-	Mirza Hassan
14. Store attendant	Ishtiaq Khan
15. Naib Masid	Masud Khan
16. Naib Masid	Abdul Wahab
17. Chowkidar	Muhammad Ali
18. Chowkidar	Muhammad Ali

(11/1)

DEPARTMENT OF TECHNICAL EDUCATION  
 KARACHI

1. Manager	
2. Senior Instructor (Elect)	
3. Senior Instructor (Auto)	
4. Instructor (Elect)	Shahid Ali
5. Instructor (Auto)	Shahid Ali
6. Instructor (Tailoring)	Shahid Ali
7. Instructor (Carpenter)	Muhammad Ali
8. Asst/lectd.	
9. Storekeeper	Muhammad Usaid
10. Junior Clerk	Muhammad Usaid
11. Workshop Attendant	Muhammad Usaid
12. -10-	
13. -12-	
14. Store Attendant	Muhammad Usaid
15. Sub Guard	Muhammad Usaid
16. Sub Guard	Muhammad Usaid
17. Chowkidar	Muhammad Usaid
18. Chowkidar	Muhammad Usaid

DEPARTMENT OF TECHNICAL EDUCATION  
 KARACHI

1. Manager	
2. Senior Instructor (Elect)	
3. Senior Instructor (Auto)	
4. Instructor (Elect)	Muhammad Usaid
5. Instructor (Carpenter)	Muhammad Usaid
6. Instructor (Tailoring)	Muhammad Usaid
7. Instructor (Auto)	Muhammad Usaid
8. Asst/lectd.	
9. Storekeeper	Muhammad Usaid
10. Junior Clerk	Muhammad Usaid
11. Workshop Attendant	Muhammad Usaid
12. Workshop Attendant	Muhammad Usaid
13. Workshop Attendant	Muhammad Usaid
14. Store Attendant	Muhammad Usaid
15. Sub Guard	Muhammad Usaid

(15)

NAME OF THE POST  
 GRADE  
 NAME OF THE INCUMBENT  
 DATE OF APPOINTMENT

SKILL DEVELOPMENT  
CENTRE, DARCOGH.

Denomination of post	Name of incumbent
1. Manager	Vacant
2. Senior Instructor(Auto)	Zahid Ali
3. Senior Instructor(Elect) ✓	Imtiyaz Ahmed working as Instr.(Elect) in B-14
4. Instructor(Elect)	Mansoor Khan
5. Instructor (Auto)	Imtiyaz Khan
6. Instructor(Carpenter)	Shahid Khan
7. Instructor(Carborin)	Shahid Khan
8. Asst/lect.	Zafar Ali
9. Storekeeper	Zafar Khan
10. Junior Clerk	Imtiyaz Khan
11. Workshop attendant	Imtiyaz Khan
12. Workshop attendant	Imtiyaz Khan
13. Workshop attendant	Imtiyaz Khan
14. Workshop attendant	Imtiyaz Khan
15. Sub class	Imtiyaz Khan
16. Sub class	Imtiyaz Khan
17. Chowkidar	Imtiyaz Khan
18. Chowkidar	Imtiyaz Khan

SKILL DEVELOPMENT  
CENTRE, DARCOGH.

Denomination of post	Name of incumbent
1. Manager	Vacant
2. Senior Instructor(Elect) ✓	Mansoor Khan
3. Senior Instructor(Auto)	Imtiyaz Ali working as Instr. (Auto) B-14
4. Instructor (Elect)	Zafar Khan

Contd....P/4

*Imtiyaz Khan*



Nomenclature of post	Name of incumbent
9. Instructor (Carpenter)	Imam Hussain
10. Instructor (Tailoring)	Muhammad Iqbal
11. Instructor (Carpenter)	Muhammad Iqbal
12. Asst./acctt.	Muhammad Khan
13. Storekeeper	Muhammad Iqbal
14. Junior Clerk	Muhammad Iqbal
15. Workshop attendant	Muhammad Iqbal
16. Workshop attendant	Muhammad Iqbal
17. Workshop attendant	Muhammad Iqbal
18. Store attendant	Muhammad Iqbal
19. Sub paid	Muhammad Iqbal
20. Sub paid	Muhammad Iqbal
21. Chowkidar	Muhammad Iqbal
22. Chowkidar	Muhammad Iqbal

SEMI-DOMESTIC  
POSTS, SEPAI PARADES

Nomenclature of post	Name of incumbent
1. Manager	Vacant
2. Senior Instructor (Elect) ✓	Muhammad Adilique
3. Senior Instructor (Auto)	Muhammad Iqbal working as Instr (Auto) in 9-10
4. Instructor (Elect)	Ghousiaatullah
5. Instructor (Auto)	Shahir Hussain
6. Instructor (Tailoring)	Alli Mohammad
7. Instructor (Carpenter)	Ijaz Ahmad
8. Asst./acctt.	Hussain Ahmad
9. Storekeeper	Vacant
10. Junior Clerk	Mujeeb ur Rehman
11. Workshop attendant	Muhammad Iqbal
12. Workshop attendant	Muhammad Iqbal
13. Workshop attendant	Muhammad Iqbal
14. Store attendant	Muhammad Iqbal
15. Sub paid	Muhammad Iqbal
16. Sub paid	Muhammad Iqbal
17. Chowkidar	Muhammad Iqbal
18. Chowkidar	Muhammad Iqbal

(17)

LIST OF STAFF  
FOR THE YEAR 1990

POSTS AND GRADES

1. Manager
2. Senior Instructor (Auto)
3. Senior Instructor (Auto)
4. Instructor (Elect)
5. Instructor (Auto)
6. Instructor (Carpenter)
7. Instructor (Tailoring)
8. Asst/Asstt.
9. Storekeeper
10. Junior Clerk
11. Workshop Attendant
12. Workshop Attendant
13. Workshop Attendant
14. Store Attendant
15. Naib Masid
16. Naib Masid
17. Chowkidar
18. Chowkidar

LIST OF STAFF

1. Asstt.
2. Asstt. In-charge
3. Javed Iqbal working on Instructor (Auto) II-14.
4. Syed Sajjad Hussain. *Syed*
5. Habibullah. *Habibullah*
6. Mohammad Khan.
7. Abdul Rashid
8. Ibrahim Siddiq.
9. Habibullah.
10. Fiaz Ahmad
11. Khaki Shah
12. Gulqar Khan.
13. Habibullah.
14. Sultan Mohammad
15. Daud Khan.
16. Attaullah Shah
17. Mohammad Aslam Khan.
18. Ishtiaq Khan.

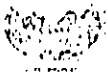
3. The expenditure involved on account of their pay and allowances shall be debitable to the Post 6-4000- Social Services 6-41000-Education 6-41300-Professional/Technical/Colleges/Universities 6-41300 Establishment of Skill Development Centre.

*S. I.*  
DIRECTOR  
MANPOWER AND TRAINING  
R.P.F.P.

No. DM/6-23/2014-36

Dated: 07.06.1990

Conudd....P/6



DIRECTORATE GENERAL TECHNICAL EDUCATION  
AND MANPOWER TRAINING NWFP PESHAWAR

18

OFFICE ORDER

In pursuance of the Judgment of the Supreme Court of Pakistan dated 10-06-2009 in Civil appeal No. 1282 in 2001 and 1366 to 1371 of 2002, the competent authority is pleased to withdraw the de-regularization order issued vide this Directorate order Bdsst: NO DMT/4-39/2712-03 dated 0<sup>th</sup> May 1996 and to restore the order of regularization of the system in respect of the following Instructors (DPS-14) issued vide this Directorate order Bdsst: No DMT/4-39/6040 (b) dated 31<sup>st</sup> July, 1993 and order Bdsst: No DMT/4-39/6040 (c) dated 31<sup>st</sup> July, 1993.

Turner/Mechinist/Bench Fitter

S.No	Name	S.No	Name with Trade
1	Mr. Insan Ullah	2	Mr. Inayat Ullah
3	Mr. Shaukat Ayaz	4	Mr. Muhammad Younas
5	Mr. Imtiaz Ahmad	6	Mr. Abdul Khaliq
7	Mr. Habib ul Manan	8	Mr. Matlur Rahman
9	Mr. Jehanzeb	10	Mr. Khalid Gul
11	Mr. Rahimur Rahman	12	Mr. Fazli Ahmad
13	Mr. Asif Daud	14	Mr. Dil Jan Khan

Welding

1	Mr. Abdur Rashid	2	Mr. Zorif Khan
3	Mr. Rooh Ullah	4	Mr. Shujat Ali
5	Mr. Auragzeb	6	Mr. Faridoon Khan
7	Mr. Murid Hussain	8	Mr. Farid ullah Khan
9	Mr. Salim Akhtar	10	Mr. Isha-ul-Haq

Pipe Fitter

1	Mr. Adeel Azam	2	Mr. Zulfqar Ali
3	Mr. S. Suleman Shah	4	Mr. Sher Ali Bax

Carpenter

1	Mr. Lala Muhammad	2	Mr. Zamir Gul
3	Mr. Zafar Iqbal		

Electrical

✓ 1	Mr. Manzoor Hayat	2 ✓	Mr. Zahorud Din
3 ✓	Mr. Shafiqat Ullah	4	Mr. Shamraz Khan
5	Mr. Muhammad Ajmal	6	Mr. Muhammad Jamil
7	Mr. Muhammad Ibrahim	8	Mr. Muhammad Ayaz

19

Mason

1	Mr. Bahadar Ali Shah		
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Draftsmen (Civil)

1	Mr. Ajmal Khan	2	Mr. Sahim Ahmad
2	Mr. Faraz Raza	3	Mr. Hayat Khan

Truck Driver

1	Mr. Asad Ullah		
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Auto (Diesel)

1	Mr. Shahabud Din	2	Mr. Ghulam Iqbal
3	Mr. Nawaz Ali	4	Mr. Wahoodur Rahman
5	Mr. Qamar Ali		

Radio TV

1	Mr. Nawaz Nathorani	2	Mr. Khalid Mehmood
3	Mr. Irfan Hussain	4	Mr. Tehsin Ullah
5	Mr. Iftikhar Ahmad		

Ref. & Air Conditioning

1	Mr. Zahoon Ullah	2	Mr. Nafees Ahmad
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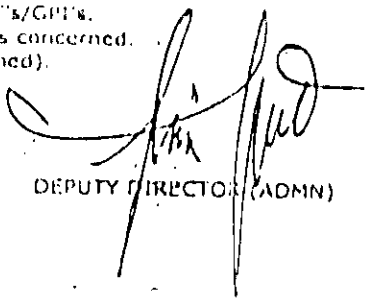
Note: The benefit of regularization if any in respect of those who are no longer in service shall confine for and up to the period of their stay in the Department.

DIRECTOR GENERAL

Encls: No. DGTER&MT/Estt-II/A-59/5218 (1-50) Dated 8/10/2009.

Copy to:-

- 1- The Accountant General/District Accounts Officer Peshawar.
- 2- The Additional Registrar Peshawar High Court w/r to his letter No.5449/Jud. dated 09-09-2009.
- 3- All the Principals of GTC's/GCT's/GPI's.
- 4- All the District Accounts Officers concerned.
- 5- Individual concerned (list attached).



DEPUTY DIRECTOR (ADMIN)

ORDER

On the recommendation of the Departmental Selection Committee, the services of the following instructors are regularised with immediate effect:-

TURNER/MACHINIST/BENCH FITTER

- 1) Mr. Ihsanullah.
- 2) Mr. Inayatullah.
- 3) Mr. Shaukat Ayan.
- 4) Mr. Muhammad Younas.
- 5) Mr. Imtiaz Ahmad.
- 6) Mr. Abdul Khaliq.
- 7) Mr. Habib-Ul-Mannan.
- 8) Mr. Mati-Ur-Rehman.
- 9) Mr. Jehanzeb.
- 10) Mr. Khalid Gul.
- 11) Mr. Rahim-Ur-Rehman.
- 12) Mr. Faiz-Ahad.
- 13) Mr. Asif Daud.
- 14) Mr. Dil Jan Khan.

WELDING

- 1) Mr. Abdur Hashid.
- 2) Mr. Zarif Khan.
- 3) Mr. Roohullah.
- 4) Mr. Shujat Ali.
- 5) Mr. Aurangzeb.
- 6) Mr. Faridoon Khan.
- 7) Mr. Murid Hussain.
- 8) Mr. Farid-Ullah Khan.
- 9) Mr. Salim Akhtar.
- 10) Mr. Ighar-Ul-Haq.

PIPE FITTER/PLUMBER.

- 1) Mr. Adool Azam.
- 2) Mr. Zulfiqar Ali.
- 3) Mr. S. Suleman Shah.
- 4) Mr. Sher Ali Dax.

CARPENTER.

- 1) Mr. Liaq Muhammad.
- 2) Mr. Zamir Gul.
- 3) Mr. Zafar Iqbal.

ELECTRICAL.

- 1) Mr. Manzoor Hayat.
- 2) Mr. Zahoor-Ud-Din.
- 3) Mr. Shafiqat Ullah.
- 4) Mr. Shamraiz Khan.
- 5) Mr. Muhammad Ajmal.
- 6) Mr. Muhammad Jamil.
- 7) Mr. Muhammad Ibrahim.
- 8) Mr. Muhammad Ayan.
- 9) Mr. Fakhrun-Zaman.
- 10) Mr. Naeem Ibrar.

Diary No 274. Dated 5.9.21.  
Skill Development Centre  
Jehangir/Akula Kaniak

(21)

MASON

- 1) Mr. Bahadar Ali Shah.

DRAUGHTSMAN (CIVIL).

- 1) Mr. Ajmal Khan.
- 2) Mr. Salim Ahmad.
- 3) Mr. Fagat Rehman.
- 4) Mr. Hayat Khan.

TEXTILE FITTER.

- 1) Mr. Asad Khan.

AUTO DIESEL.

- 1) Mr. Shahabuddin.
- 2) Mr. Ghulam Hussain.
- 3) Mr. Nawaz Ali.
- 4) Mr. Waheed-Ur-Rehman.
- 5) Mr. Qamar Ali.

RADIO/T.V.

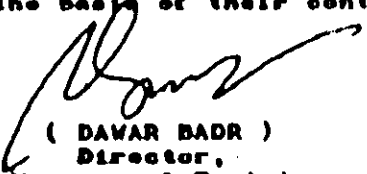
- 1) Mr. Nawaz Nathaniel.
- 2) Mr. Khalid Mehmood.
- 3) Mr. Iltaf Hussain.
- 4) Mr. Tehsin Ullah.
- 5) Mr. Iftikhar Ahmad.

REFRIG. & AIR-CONDITIONING.

- 1) Mr. Zahoor Ullah.
- 2) Mr. Nafees Ahmad.

Note:-

Their inter-se-seniority and their seniority vis-a-vis the staff of Skill Development Centre absorbed in Directorate of Manpower & Training NWFP and those appointed on regular basis shall be determined on the basis of their continuous officiation in service.

  
 ( DAVAR BADR )  
 Director,  
 Manpower & Training  
 N.W.F.P.

Endat No. DMT/4-39/46 (5)

Dated: - 31-7-73

- 1- Copy to Principals, TPO/ATC, ORC & DC Ichangwa.
- 2- Official concerned.
- 3- Personal file of the official concerned.

  
 (S. ASHIQ HUSSAIN BHATT)  
 DEPUTY DIRECTOR.

R-2

Still Development Centre (Chitral)

... upon his appointment / adjusted from Govt:  
 ... (Chitral) to Still Development Centre (Chitral)  
 ... via Directorate of Employment Training (D/T/701-50)  
 ...  
 ... his duty  
 ... to report to the Officer (Chitral).  
 ... after the normal joining time.  
 ... Still Development  
 ...

OFFICER (CHITRAL),  
 STILL DEVELOPMENT CENTRE (CHITRAL).

... 70-44

Dated 7-5 1991.

- 1. ...
- 2. ...
- 3. ...
- 4. ...
- 5. ...
- 6. ...
- 7. ...

*[Signature]*  
 9/5/91  
 Officer (Chitral)

Still Development Centre  
 (Chitral)

**VAKALAT NAMA**

NO. 1116 /2016.

IN THE COURT OF Service Tribunal Peshawar

Zahoor-ud-Din

(Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

Govt. of KPK & others

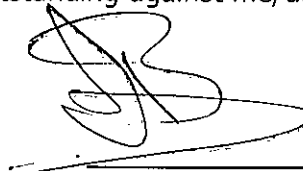
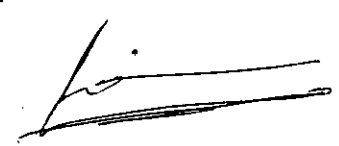
(Respondent)  
(Defendant)

I/We, Respondants # 6, 7

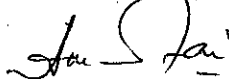
Do hereby appoint and constitute **M. Asif Yousafzai, Advocate Supreme Court Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any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

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


Dated \_\_\_\_\_/20

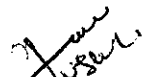
  
  
\_\_\_\_\_  
(CLIENT)

ACCEPTED



**M. ASIF YOUSAFZAI**  
Advocate Supreme Court  
Peshawar.

  
**Taimur Ali Khan**  
Advocate High Court

  
**Syed Nauman Ali Bukhari**  
Advocate

**OFFICE:**

Room # FR-8, 4<sup>th</sup> Floor,  
Bilour Plaza, Peshawar,  
Cantt: Peshawar  
Cell: (0333-9103240)



Service Appeal No. 492 /2014

Zahoor-ud-Din .....Appellant

Versus

The Govt. and others.....Respondents

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**REJOINDER ON BEHALF OF APPELLANT IN RESPONSE  
TO REPLY FILED BY RESPONDENT NO. 3 (Bashir Ahmad).**

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Respectfully Sheweth,

**Preliminary Objections:**

Preliminary objections raised by answering respondents are erroneous and frivolous. The appellant has got cause of action to file the instant appeal which is maintainable under the law i.e. Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act-1974. The claim of the appellant is bonafide. All the necessary parties have been arrayed as Respondents. The appeal in hand is within time and estoppel does not operate against the law.

**Facts:**

1. Misconceived. The appellant being senior to the answering Respondent was placed as such in the Provisional Seniority List of Instructor (BPS-14) issued vide letter dated 05.07.2012.
2. Incorrect hence denied. The provisional seniority list was in accordance with law and it was wrongly disturbed at the instigation of the answering Respondent. Moreover, appellant was not provided an opportunity of hearing before considering the reservation of the answering Respondent. Moreover, the promotion order dated 19.02.2014 has already been called in question in Service Appeal No.116/2014 before the Hon'ble Tribunal which is still pending.

- 2
3. Incorrect hence denied. Seniority is a continuous cause of action. Each circulation of seniority list gives a fresh cause of action. The seniority list dated 23.04.2012 was communicated to the appellant on 07.12.2013 and departmental appeal thereagainst was filed on 09.12.2013 after two days hence the same was within time. The promotion order has already been challenged.

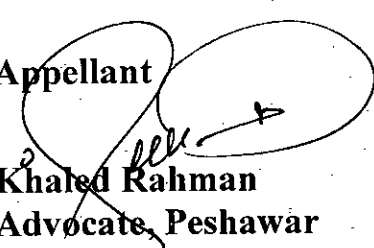
**Grounds:**

- A. Incorrect. Appellant has not been treated according to law.
- B. Incorrect. The law on the subject matter of seniority has been violated by issuance of impugned order.
- C. Incorrect hence denied. The answering Respondent was appointed against the post vacated by the appellant as is evident from the letter dated 21.05.1991 therefore he cannot be senior to the appellant.
- D&E. Misconceived hence denied.
- F. Needs no reply.

It is, therefore, humbly prayed that the reply of answering Respondents No.3 may graciously be rejected and the appeal as prayed for may graciously be accepted with costs.

Through

Appellant

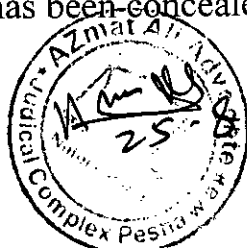
  
Khaled Rahman  
Advocate, Peshawar

Dated: 25/08/2015

**Affidavit**

I, Khaled Rahman, Advocate, as per instructions of my client, do hereby affirm and declare on oath that the contents of this rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

**ATTESTED**



  
Deponent

CERTIFICATE

It is certified that I have lodged an Appeal before the Khyber Pakhtunkhwa Service Tribunal Peshawar vide Service Appeal No. 492/2016 Regarding impugned Seniority/ promotion.

I have been promoted from BPS-15 to BPS-17 in 2017.

I have been retired from service with effect from 28-02-2018.

I have no objection if the Apex Court may dispose-off the above said appeal, as my grievances have already been resolved in this regard please.



NAME OF APPELLANT. ZAHOOR-UD-DIN  
DESIGNATION. EX- SENIOR INSTRUCTOR.  
PLACE OF POSTING. GTVC(B), GHAZNI KEL.  
CNIC: 11201-0333749-9  
Cell: 0346-7998055.



ATTESTED BY

**Principal**  
Govt. Tech. & Vocational Center,  
Ghazni Office