

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 732/2019

Date of institution 30.05.2019

Shams Ullah, Shop Attendant (BPS-03) Govt: College of Technology,
Bannu.

VERSUS

Managing Director, Khyber Pakhtunkhwa Technical and Vocational
Training Authority (KP TEVTA), Peshawar and others.

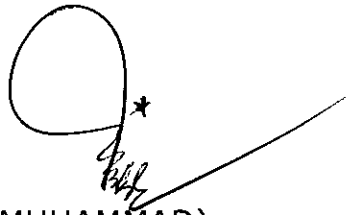
ORDER

18.11.2021

Mr. Fazal Shah Mohmand, Advocate, for the appellant present.
Mr. Kabirullah Khattak, Additional Advocate General alongwith Mr. Ali
Gohar Durani, Legal Advisor for respondents present.

Learned counsel for the appellant submitted an application for
withdrawal of the instant appeal on the ground that the appellant
does not want to pursue the case further.

In view of the above, the appeal in hand stands dismissed as
withdrawn. File be consigned to the record room.



(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

ANNOUNCED

18.11.2021

08.07.2021


Counsel for appellant present.

Muhammad Adeel Butt learned Additional Advocate General for respondents present.

Request for adjournment was made on behalf of learned counsel for appellant; granted. To come up for arguments on 18.11.2021 before D.B.



(Rozina Rehman)
Member(J)



Chairman

19.11.2020


Junior counsel for appellant present.

Muhammad Jan learned Deputy District Attorney for respondents present.

Former made a request for adjournment as senior counsel is not available. Adjourned. To come up for arguments on 02.02.2021 before D.B.



(Atiq ur Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

02.02.2021

Due to COVID-19, the case is adjourned for the same on 07.04.2021 before D.B.



READER

07.04.2021

Due to demise of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 08.07.2021 for the same as before.




Reader

7.5.2020

Due to COVID19, the case is adjourned to

27/7/2020 for the same as before.


Reader


27.07.2020

Due to COVID-19, the case is adjourned. To come for the same on 17.09.2020 before D.B.



Reader


17.09.2020

Junior counsel for appellant on behalf of appellant present.

 Mr. Muhammad Jan learned Deputy District Attorney for respondents present.

Former requests for adjournment as senior counsel is busy before Hon'ble Peshawar High Court, Peshawar. Adjourned. To come up for argument on 19.11.2020 before D.B.


(Atiq ur Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)

27.11.2019


Appellant in person and Addl. AG for respondents NMo. 1 & 2 and counsel for respondent No. 4 present. Nemo for respondents No. 3 & 5.


Respondents No. 3, 4 and 5 have not furnished their respective reply/comments despite last opportunity. The appeal is posted to 20.01.2020 for arguments before D.B. The appellant may furnish rejoinder, within one month, if so advised.


Chairman

20.01.2020

Due to general strike on the call of the Khyber Pakhtunkhwa Bar Council, learned counsel for the appellant is not available today. Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Adjourned to 10.03.2020 for further proceedings before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

10.03.2020

Counsel for the appellant present. Mr. Muhammad Jan, DDA for respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 07.05.2020 before D.B.


Member


Member

02.09.2019

Junior to counsel for the appellant and Asstt. AG for respondents No. 1 & 2 present. Mr. Bashar Naveed Khan, Advocate on behalf of respondent No. 4 present and Wakalatnama in his respect placed on file.

Representatives of the said respondents request for time to furnish written reply/comments. Fresh notice be issued to respondent No. 3 & 5. Adjourned to 27.09.2019 on which date the respondents shall positively submit their respective written reply/comments.


Chairman

27.09.2019

Counsel for the appellant present. Mr. Shahab Khattak, Legal Advisor for respondents No. 1, 2 and 5 present and requests for time. Nemo for respondents No. 3 and 5. Fresh notices be issued to them.

To come up for reply/comments on 23.10.2019 before S.B.


Chairman

23.10.2019

Appellant with counsel present. Mr. Kabirullah Khattak learned Additional Advocate General alongwith Shahab Khattak Legal Advisor for respondents No.1 & 2 present.

Representative of respondents No.1 & 2 submitted reply. Notice be issued to respondents No.3 to 5 for submission of reply by way of last chance.

To come up for reply/comments on 27.11.2019 before S.B.


Chairman

04.07.2019

Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant argued that the appellant was appointed as Shop Attendant through order dated 18.07.1994. That through letter dated 12.06.2018 the appellant and others were directed to submit bio-data for verification from the quarters concerned. Thereafter, the Departmental Promotion Committee in its meeting held on 13.02.2019 promoted ineligible candidates, while the appellant was ignored. Feeling aggrieved, he preferred departmental appeal on 18.02.2019 which remained unanswered, hence the present service appeal. Had ineligible officials not been considered for promotion, the appellant would have got a chance to be promoted as Shop Assistant BPS-7. He was not treated in accordance with law and rules.

Points raised need consideration. The appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 02.09.2019 before S.B.

Appellant Deposited
Security & Process Fee



4/7/19


Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- _____ 732/2019 _____


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/06/2019	<p style="text-align: center;">The appeal of Mr. Shams Ullah resubmitted today by Mr. Fazal Shah Mohmand Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 13/6/19</p>
2-	14/06/19	<p style="text-align: center;">This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>04/07/19</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Shamsullah Shop Attendant Govt College of Technology Bannu received today i.e. on 30.05.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Page no. 12, 13 and 14 of the appeal are illegible which may be replaced by legible/better one.

No. 1055 /S.T,

Dt. 31-5- /2019.


REGISTRAR 31/5/19
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Fazal Shah Mohmand Adv. Pesh.

Sir, Resubmitted after necessary completion.


13/6/19 (Adv)

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Service Appeal No 732 /2019

Shams Ullah.....Appellant

V E R S U S

Managing Director & Others.....Respondents

I N D E X

S. No	Description of Documents	Annexure	Pages
1.	Service appeal with Affidavit		1-4
2.	Copies of documents	A	5-8
3.	Copy of Letter dated 12-06-2018	B	9-12
4.	Copy of Office Order dated 13-02-2019	C	13-14
5.	Copy of Departmental Appeal with letters	D	15-17
6.	Copy of Attendance Sheet of GCT Bannu	E	18
7.	Copy of Notification dated 22-04-2015	F	19-21
8.	Copy of Letter dated 01-11-2018	G	22
9.	Wakalat Nama		23

Dated:-27-05-2019


Appellant

Through


Fazal Shah Mohmand

Advocate, Peshawar

- / -

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Service Appeal No 732 /2019

Shams Ullah Shop Attendant (BPS-03) Govt. College of Technology, Bannu, Khyber Pakhtunkhwa

Appellant No. 824

V E R S U S

Dated 30/5/2019

- ✓ 1. Managing Director, Khyber Pakhtunkhwa Technical and Vocational Training Authority (KP TEVTA), Peshawar.
 - ✓ 2. Secretary to Govt. of Khyber Pakhtunkhwa, Industries and Commerce and Technical Education Department, Peshawar.
 3. Niamat Ullah, Shop Assistant (BPS-07), Govt. College of Technology, Timergara Dir Lower.
 - ✓ 4. Jehangir Khan, Shop Assistant (BPS-07), Govt. College of Technology, Kohat.
 5. Shams Uddin, Shop Assistant (BPS-07), Govt. Polytechnic Institute, Wari, Dir
- Upper..... Respondents

APPEAL APPEAL U/S 4 OF THE KPK SERVICE TRIBUNAL ACT 1974 AGAINST THE OFFICE ORDER DATED 13-02-2019, TO THE EXTENT OF RESPONDENTS NO 3 TO 5 WHEREBY INELIGIBLE CANDIDATES HAVE BEEN PROMOTED AS SHOP ASSISTANT (BPS-07) AND AGAINST WHICH THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS NOT BEEN RESPONDED DESPITE THE LAPSE OF MORE THAN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:-

Filed to-day On acceptance of this appeal the impugned Office Order dated 13-02-2019 to the extent of respondents No 3 to 5 may kindly be set aside and the appellant may kindly be ordered to be promoted as Shop Assistant (BPS-07) with effect from 13-02-2019 with all back benefits.

Registrar
30/5/19.

Respectfully Submitted:-

1. That the appellant is highly qualified, has passed his SSC in the year 1990 and two years Trade Proficiency Certificate in the year 1992 and was appointed as Shop Attendant on 18-07-1994 and since then he performed his duties with honesty and full devotion and to the

Re-submitted to day and filed.

Registrar
13/6/19.

entire satisfaction of his high ups. **(Copies of documents are enclosed as Annexure A).**

2. That since appointment the appellant has not been promoted while he is perfectly fit and eligible and coming up to the criteria for promotion to the post of Shop Assistant (BPS-07) and vide letter dated 12-06-2018 the appellant along with others was directed to submit verified Bio-data and their credentials were also called for from the institutions concerned for to submit their credentials to verify the same from the concerned recognized boards, which the appellant duly provided and were also verified by respondent No 1. **(Copy of letter dated 12-06-2018 is enclosed as Annexure B).**
3. That there after the appellant was called for to appear before the Departmental Promotion Committee on 05-12-2018 and he accordingly appeared before the DPC on the given date and was also told that he being eligible and coming up to the criteria is going to be promoted, however to the utter shock and surprise, respondents No 3 to 5 along with others were promoted ignoring the appellant vide Office Order dated 13-02-2019. **(Copy of Office Order dated 13-02-2019 is enclosed as Annexure C).**
4. That the appellant filed departmental appeal on 18-02-2019 which was duly forwarded however the same has not been responded so far despite the lapse of more than ninety days. **(Copy of departmental appeal & letters are enclosed as Annexure D).**
5. That the impugned Office Order dated 13-02-2019 to the extent of respondents No 3 and 4 is against the law, facts and principles of justice on grounds inter-alia as follows:-

GROUND:-

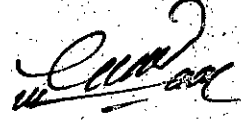
- A. That the impugned Office Order is illegal and void ab initio.
- B. That mandatory provisions of law have been violated by the respondents while making the impugned promotion order and more particularly rules governing the subject.

- C. That as per letter dated 12-06-2018; respondents No 3 to 5 were declared as **Ineligible** for lacking the required Trade Proficiency Certificate but even were promoted for reasons best known to the respondents.
- D. That nine colleagues of the appellant were promoted and if ineligible candidates are excluded, then the appellant comes to serial No 7 and as such becomes entitled to be promoted.
- E. That even respondent No 4 did not appear before the DPC as evident from the attendance sheet and was on duty the same day in the College but even then he has been promoted. **(Copy of Attendance Sheet of GCT Bannu is enclosed as Annexure E).**
- F. That even respondents No 3 to 5 never availed any sort of leave nor any NOC/Permission for acquiring the relevant professional/technical qualification and were also declared as ineligible thus they are not in possession of such qualification, so have managed fake Certificates for the purpose, thus their promotion order need to be struck down.
- G. That the rules Notified vide Notification dated 22-04-2015, are governing the matter wherein too the Trade Proficiency Certificate from a recognized Institution is pre-requisite, as such too respondents No 3 to 5 are not eligible for promotion. **(Copy of Notification dated 22-04-2015 is enclosed as Annexure F).**
- H. That even respondents No 3 and 4 were not directed for appearance before the DPC as per letter dated 01-11-2018 but have been promoted for reasons other than fair and bonafide. **(Copy of Letter dated 01-11-2018 is enclosed as Annexure G).**
- I. That the appellant is perfectly fit and eligible and coming up to the criteria set forth in law and rules but malafidely has not been promoted.
- J. That the impugned order is defective and as such not maintainable in the eyes of law.
- K. That the appellant has about 25 years of service with unblemished service record.

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

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

Dated:-27-05-2019



Appellant

Through



Fazal Shah Mohmand

Advocate Peshawar.

AFFIDAVIT

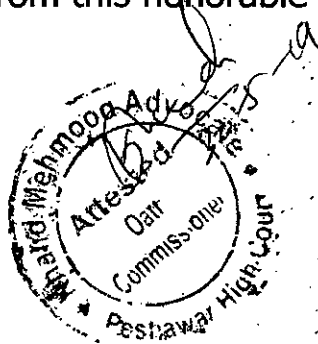
I, Shams Ullah Shop Attendant (BPS-03) Govt. College of Technology Bannu, do hereby solemnly affirm and declare on oath that the contents of this **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

Identified by



Fazal Shah Mohmand

Advocate Peshawar.



DEPONENT

DOMICILE CERTIFICATE

V A
-5-

I declare that I was born of Parents who are Permanent domiciled in North Frontier Province having been born/ settled in this province.

I was born of village/ Mohallah KOTCA KHAN, SHERIKHAN, MUZA NAR
Tehsil BANNU District BANNU

Shams Ullah Khan
Signature of the Applicant.
Dated 10/11/1980

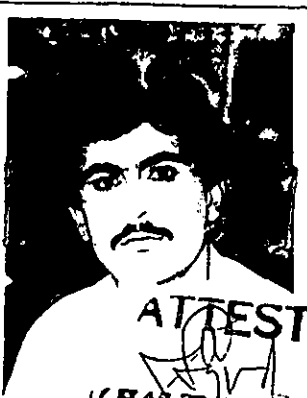
Pursuance to the declaration dated 10/11/1980

filled by Mr SHAMS ULLAH KHAN S/O HAFIZ AMIR KABAL KHAN

Domiciled in North west Frontier Province it is hereby certified that the said SHAMS ULLAH KHAN is born of Parents who are Permanent residents of the North West-Frontier Province having been born settled with in it.

I have satisfied my self from personal knowledge verification through Personal that the above declaration is true and certify accordingly

this 16th Day August 1980



ATTESTED

AFRAB KHAN
Phone 314
Commissioner
Magistrate I Class
1980

Magistrate 1st class, Bannu



Office of the District Magistrate Bannu

No. 6590 /HC Dated Bannu the 10/11/1980

COUNTERSIGNED

District Magistrate Bannu
Muhammad Amir Ullah



ASSOCIATE PROFESSOR
Govt. College of Technology

من تھو لیں کرنا ہوں کہ سائیکل جسٹس اللہ کان و لا فاجی اذ تریہ تہات ہا
توسین ۱۹۵۰ء کی طور پر لے کر لیا گیا تھا جس کا سائل اس وقت تک کاٹھن میں درج نہیں کیا گیا ہے
مستقل راجہ کی ویدو کے پاس اس کا کوئی بھی ادویہ نہیں ہے۔

Government of India
Ministry of Home Affairs
Central Narcotics
Board No. 155-36-97081A

ضابطہ نمبر ۱۵۵-۳۶-۹۷۰۸۱
میں بتایا گیا ہے کہ سائیکل جسٹس اللہ کان و لا فاجی اذ تریہ تہات ہا
توسین ۱۹۵۰ء کی طور پر لے کر لیا گیا تھا جس کا سائل اس وقت تک کاٹھن میں درج نہیں کیا گیا ہے
مستقل راجہ کی ویدو کے پاس اس کا کوئی بھی ادویہ نہیں ہے۔

۱۵/۸/۹۰

الحسنی

۱۵/۸/۹۰
H.C. Dated 15/8/1950

PHOTO

Office of the District Magistrate Bannu
No. 62
COMMISSIONER
District Magistrate Bannu

S.N. 886

Admission No. 3033

Date: 4/2
88

- 6 -
GOVT. HIGHER SECONDARY SCHOOL

SERAI NAURANG BANNU
PROVISIONAL CERTIFICATE

Certified that Shou Gulab Khan /o Kabool Khan who appeared from this school at the Intermediate Part-I, II/S.S.C. Annual/Supp: Examination 1992 under Roll No 55864 has, according to the Gazette Notification issued by the Controller of Examinations, Board of Intermediate & Secondary Education Peshawar, been declared successful in the said Examination.

NOTE: This certificate is given only with the object of enabling the student to be admitted to a college and is not to be held equivalent to the certificate to be given to him by the Controller of Examinations, Board of Intermediate & Secondary Education, PEW.

Marks Obtained: 407/500 Grade: "D" Conduct: Good

Passed in the following Elective subjects: IS, pas, GM, GC.

Date of birth: Fifteenth April Nineteen hundred & Seventy Three
(in figures): 15-4-1973

Prepared by: [Signature]

[Signature]
Associate Professor
Govt. College of Technology
Bannu

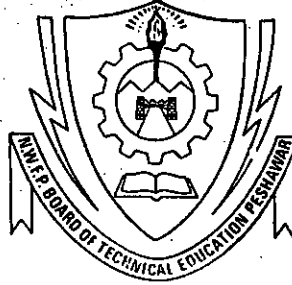
[Signature]
Principal
Govt. Higher Secondary School
Serai Naurang (Bannu)

S. No. 001554

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Roll No. 722

PESHAWAR - 8 -
P. W. T. D. Board of Technical Education



SESSION 1991

This is to certify that

Mr. SHAMS ULLAH

son of Mr. KABOOT KHAN

Registered No. GVI/B/BU/90-3684

of Government Vocational Institute BANNU

has satisfactorily completed ~~one~~ year / two years

3150

contact hours programme of

instructions in ELECTRICIAN Trade with

an average of 20% time on theory and 80% on Practical

Work and has passed the Annual / Supplementary

Examination held in JUNE 1992

securing 558/1050 marks and was placed in

"C"

Grade.

In recognition thereof this certificate

is awarded at Peshawar

on 30th day of DECEMBER 1992

Peshawar 30 - 12 - 1992

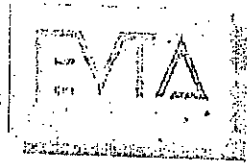
SECRETARY

CHAIRMAN

ATTN



KHYBER PAKHTUNKHWA TECHNICAL
EDUCATION & VOCATIONAL TRAINING
AUTHORITY, OLD BARA ROAD,
UNIVERSITY TOWN, PESHAWAR



No.KP-TEVTA/HR-II 2867 (1-17)

Dated. 12/6/2018

- To
1. The Principal,
Govt. College of Technology, Abbotabad/ Bahnu/Swabi/Nowshera /
DIKhan / Peshawar/Swat/GPI, Haripur.
 2. The Principal,
Govt. Technical Vocational Centre, Takhtbai, Mardan/ Chitral/Ghazni
Khel/ Women, Charsadda/ KTS, Haripur.
 3. The Principal,
Govt. Technical Institute, Dara Adam Khel/ Sadda(Khurram)/ Ekkaghund.

Subject:- BIODATA/VERIFICATION OF CERTIFICATES/CREDENTIALS:

I am directed to refer to the subject noted above and to state that the promotion cases of the following Workshop Attendants BPS-03 of your college/centre is under consideration of this office. The requisite seniority list of these officials has already been finalized. However, the Competent Authority has desired to verify the credentials of these officials from the concerned recognized boards. Further, these officials are required to submit their verified Bio data along with three photographs on the attached prescribed form through the Principal concerned, for its placement before the Departmental Promotion Committee. Besides, the officials who do not possess the requisite qualifications of Matric and Trade Proficiency Certificate must also submit a certificate to this effect through the Principal concerned.

A glimpse of bio-data of these officials is submitted below for perusal of all concerned and for rectification, if any, so as to reach this office within 07 days of the issuance of this letter, otherwise it shall be considered as correct and final.

Sr #	Name of incumbent/ DOB/Posting	Qualification / Trade Certificate	Date of appointment to the present post.	Regular to the prescribed length of service.	Whether completed prescribed length of service.	Whether eligible for promotion
1-	Mr. Muhammad Naeem/08-4-66/ GCT, Swabi	i) Matric	07-10-1985	Yes	Yes	Not Eligible. Lacks TPC
2-	Mr. Dilbar Khan / 02-01-61/ GTVC, Takhtbai	i) Matric ii. 06 months G-III Trade Proficiency Certificate. iii. 6 months special training course from Ghazi Brotha Training Program.	27-04-1988	Yes	Yes	Eligible
3-	Mr. Niamatullah/ 01-7-1966/GTI, Ekkaghund	i) Matric	16-08-1988	Yes	Yes	Not Eligible. Lacks TPC
4-	Mr. Zahir Shah / 17-4-70/ GTVC, Takhtbai	i) Matric ii) G-II level Cert. from TTB.	01-07-1989	Yes	Yes	Eligible

ATTN

5-	Mr. Misal Khan/ 03-5-73/ GCT, Nowshera	i) Matric ii. 6 months certificate from TTB.	05-08-1989	Yes	Eligible ✓
6-	Mr. Shamsuddin 04-04-1970/ GTVC(B) Chitral	Matric	25-02-1990	Yes	Not Eligible. Lacks TPC ✓
7-	Mr. Saleem Nawaz / 20-4-64/ GCT, DIKhan.	i) Matric ii. One year certificate from GTTC, DIKhan	20-06-1990	Yes	Eligible ✓
8-	Mr. Waheed Khan 06-3-1971/GCT, Peshawar	Middle.	1-11-1990	Yes	Not Eligible. Lacks Matric plus TPC
9-	Mr. Jaffar Shah 6-4-1967/ GTVC(B) Ghazni Khel	Matric and Auto Trade Certificate	01-12-1991	Yes	Eligible ✓
10	Mr. Darwaish Khan. 01-4-1968/ GCT, Swat	Matric with months carpentry Certificate	10-07-1993	Yes	Eligible ✓
11	Mr. Mian Rafiqullah. 10-09-1973/ GCT, Nowshera	FA with 6 months Trade Certificate	01-08-1993	Yes	Eligible ✓
12	Mr. Wajid Khan, 15-06-1963/ GCT, Bannu	Matric	12-06-1994	Yes	Not Eligible. Lacks TPC ✓
13	Mr. Ichangir Khan. 27-01-1971/ GCT, Bannu	Matric	12-06-1994	Yes.	Not Eligible. Lacks TPC
14	Mr. Shamsullah 15-04-1973/GCT, Bannu	Matric with G-II certificate	18-07-1994	Yes	Eligible ✓
15	Mr. Muhammad Iqbal 01-5-1967/ GTVC(W) Charsadda	Matric	16-11-1994	Yes	Not Eligible. Lacks TPC
16	Mr. Faisal Khan, 23-08-1958/GCT, Abbotabad	DAB(Civil)	13-04-1995	Yes	Eligible ✓
17	Mr. Shaheen Shah 1-1-75/GTL, Sadda	FA	15-11-95	Yes	Not Eligible. Lacks TPC
18	Mr. Muhammad Ilyas, 10-12-75 / GTVC(B), KTS, Haripur/	Matric	10-12-1975	Yes	Not Eligible. Lacks TPC

DA/As above.

DEPUTY DIRECTOR (HR)

ATTESTED

- 11 -

OFFICE OF THE PRINCIPAL,
GOVT; COLLEGE OF TECHNOLOGY

BANNU Phone No. 0928-6332072.

Email address. engr.abdulghafar1@gmail.com

DATED 31/03/2018.

No. GCT/BU/ 758

To

The Director Admin/HR
KP-TEVTA Peshawar.

Subject:

**DOCUMENTS OF MR. SHAMSULLAH KHAN SHOP ATTENDANT FOR
PROMOTION TO THE POST OF SHOP ASSISTANT.**

Reference your telephonic contact for sending the above information in respect of Mr. Shamsullah Khan shop attendant for his promotion to the post of shop assistant, please attach herewith the required documents for further n/a. It is further stated that Mr. Jahangir Khan shop attendant have no Technical course documents to be attached.

Professor Engr. Abdul Ghafar
Principal
Govt; College of Technology
Bannu

ATTESTED



KHYBER PAKHTUNKHWA
TECHNICAL EDUCATION & VOCATIONAL
TRAINING AUTHORITY

W-5771, Gul Bana Road, University Town Peshawar
Web: www.kptepta.gov.pk



ATTENDANCE SHEET OF THE SHOP ATTENDANT (GPSO) APPEARED
BEFORE THE DIC AT HEAD OFFICE ON 05-11-2018

SER. NO	NAME OF CANDIDATE	DUTY STATION	SIGNATURE
1	WAZIR KHAN	GVC B TARIQAB MARDAN	<i>[Signature]</i>
2	SAIF KHAN	GVC B TARIQAB MARDAN	<i>[Signature]</i>
3	SHAM SUDEEN	GPT WARI DIB	<i>[Signature]</i>
4	SHLEEN NAWAZ	GCT D I KHAN	<i>[Signature]</i>
5	JAFAR KHAN	GVC B KARU	<i>[Signature]</i>
6	DAPYA SHEKHAN	GCT SWAT	<i>[Signature]</i>
7	MURAD PATELLAH	GCT NOWSHEERA	<i>[Signature]</i>
8	IMAM SULLAN	GCT BANNU	<i>[Signature]</i>
9	FASAL KHAN	GCT ABBOTABAD	<i>[Signature]</i>
10	QAMAR ULLAH	GCT KASHGUR	<i>[Signature]</i>
11	ISHAF GUR KHAN	GCT BANNU	<i>[Signature]</i>
12	SHAEEN KHAN	GPT SADDA	
13	MUHAMMAD ATYAS	GPT HAPPLA	

ATK

**KHYBER PAKHTUNKHWA
TECHNICAL EDUCATION & VOCATIONAL
TRAINING AUTHORITY**
S-771, Old Bara Road, University Town, Peshawar
Web. www.kp.gov.pk

ATTENDANCE SHEET OF THE SHOP ATTENDANT (BPS03) APPEARED
BEFORE THE DIC AT HEAD OFFICE ON 05.11.2018

Sr. No.	NAME OF CANDIDATE	DUTY STATION	SIGNATURE
1	DILBAR KHAN	GTVC (B) TAKHT BHAJ MARDAN	-sd-
2	ZAHIR SHAH	GIVC (B) TAKHT BHAJ MARDAN	-sd-
3	SHAMS UDDIN	GPI, WARI DIR	-sd-
4	SALEEM NAWAZ	GCT D.I.KHAN	-sd-
5	JAFAR KHAN	GTVC (B), LAKKI	-sd-
6	DARWASH SHAH	GCT, SWAT	-sd-
7	MIAN RAFI ULLAH	GCT NOWSHERA	-sd-
8	SHAMSULLAH	GCT BANNU	-sd-
9	FAISAL KHAN	GCT ABBOTTABAD	-sd-
10	NAIMAT ULLAH	GIT EKA GHUND	-sd-
11	JEHANGIR KHAN	GTI BANNU	
12	SHHAEEN SHAH	GTI SADDA	
13	MUHAMMAD ILYAS	GPI HARIPUR	

"C"

-13-



KHYBER PAKHTUNKHWA
TECHNICAL EDUCATION & VOCATIONAL
TRAINING AUTHORITY

5-77, Old Park Road, Lower City, Town Faisalabad
S.D. Muzaffargarh



OFFICE ORDER:

Consequent upon recommendation of the Departmental Promotion Committee, the following Shop Attendants BPS-03 of this department are hereby promoted to the post of Shop Assistant BPS-07 with immediate effect:

1. Mr. Dilbar Khan	6. Mr. Jaffar Shah
2. Mr. Niamat Ullah	7. Mr. Dawood Khan
3. Mr. Zahir Shah	8. Mr. Moin Raza Khan
4. Mr. Shamsuddin	9. Mr. Farhan Khan
5. Mr. Saleem Nawaz	

- 2- Their promotion is also subject to the following terms and conditions:
- They will be on probation for a period of one year in terms of Section 5 (2) of NWFP Civil Servants Act, 1973 read with Rules 5 (1) of NWFP Civil Servants (Appointment, Promotion & Transfer) Rules, 1959.
 - Their in-service seniority of the incumbent of the vacant post as they were in lower cadre of the incumbent.
 - They will be governed by such service conditions, may be prescribed and issued by the Government from time to time for the category of Government employees.
 - They shall be liable to be transferred to any other post from the quarter concerned.
 - If they wish to resign from the post on the terms & conditions they shall be required to give 15 days notice in writing with 15 days of the notice the incumbent of the vacant post against which their promotion will be treated as cancelled.
- 3- They shall be liable to be posted to any other post against the vacant post against which their promotion will be treated as cancelled.

S.No	Name of Incumbents	Promoted/Posted at
1	Mr. Dilbar Khan, Shop Attendant BPS-03 GTVC (B) Takht Bhar, Mardan.	Govt. College of Technology Nowshera against the vacant post of Shop Assistant BPS-07.
2	Mr. Niamat Ullah, Shop Attendant BPS-03 GIT, Ekka Ghung, FATA	Govt. College of Technology, Timergara Dir (I) against the vacant post of Shop Assistant BPS-07
3	Mr. Zahir Shah, Shop Attendant BPS-03 GTVC (B) Takht Bhar, Mardan	Govt. College of Technology, Nowshera against the vacant post of Shop Assistant BPS-07
4	Mr. Shamsuddin, Shop Attendant BPS-03 GPI Wari, Dir Upper	Govt. Polytechnic Institute, Wari Dir Upper against the vacant post of Shop Assistant BPS-07.

Continued on next page

KHYBER PAKHTUNKHWA
TECHNICAL EDUCATION & VOCATIONAL
TRAINING AUTHORITY
S-771, Old Bara Road, University Town, Peshawar
Web. www.kp.gov.pk

OFFICE ORDER:

Consequent upon recommendation of the Departmental Promotion Committee, the following Shop Attendants BPS-03 of this department are hereby promoted to the posts of Shop Assistants BPS-07 with immediate effect.

1	Mr. Dilbar Khan	6	Mr. Jaffar Shah
2	Mr. Niamat Ullah	7	Mr. Darwaish Khan
3	Mr. Zahir Shah	8	Mr. Mian Rafi Ullah
4	Mr. Shamsuddin	9	Mr. Jehangir Khan
5	Mr. Saleem Nawaz		

2. Their promotion is also subject to the following terms and conditions:
1. They will be on probation for a period of one year in terms of Section 6 (2) of NWFP Civil Servants Act, 1973 read with Rules-15 (1) of NWFP Civil Servants (Appointment Promotion & transfer) Rules, 1989.
 2. The inter-se seniority of the promotes shall remain intact as they were in lower cadre of the seniority list.
 3. They will be governed by such Rules and orders as may be prescribed and issued by the Government from time to time for the category of Government Servants to which they belongs.
 4. Their credentials will be verified by the Principal concerned from the quarter concerned accordingly.
 5. If they wish to accept the post of one above terms & conditions, they should report for duty to the Principal concerned within 15 days of the issuance of this order, failing which the offer of promotion will be treated as cancelled.
3. Consequent upon their promotion they are posted against the vacant posts as mentioned against teach in the public interest.

Sr. No.	Name of incumbents	Promoted / Posted at
1	Mr. Dilbar Khan Shop Attendant BPS-03 GTVC (B) Takht Bhai Mardan	Govt. College of Technology, Nowshera against the vacant post of Shop Assistant BPS-07
2	Mr. Niamat Ullah Sho Attendant BPS-03 GTI, Ekkaghund, FATA	Govt. College of Technology, Timergara Dir (L) against the vacant post of Shop Assistant BPS-07
3	Mr. Zahir Shah, Shop Attendant BPS-03 GTVC (B) Takht Bhai Mardan	Govt. College of Technology, Nowshera against the vacant post of Shop Assistant BPS-07
4	Mr. Shamsuddin Shop Attendant BPS-03 GPI, Wari Dir Upper	Govt. Polytechnic Institute, Wari Dir Upper against the vacant post of Shop Assistant BPS-07

continued on next page

-14-

5	Mr. Saleem Nawaz, Shop Attendant BPS-03 GCT, D.I.Khan	Govt. College of Technology, Kohat against the vacant post of Shop Assistant BPS-07.
6	Mr. Jaffar Shah, Shop Attendant BPS-03 GTVC (B), Ghazni Khel, Lakki Marwat	Govt. College of Technology, Kohat against the vacant post of Shop Assistant BPS-07.
7	Mr. Darwaish Khan, Shop Attendant BPS-03 GCT, Swat	Govt. College of Technology, Swat against the vacant post of Shop Assistant BPS-07.
8	Mr. Mian Rafi Ullah, Shop Attendant BPS-03 GCT, Nowshera	Govt. College of Technology, Nowshera against the vacant post of Shop Assistant BPS-07.
9	Mr. Jehangir Khan, Shop Attendant BPS-03 GCT, Bannu	Govt. College of Technology, Kohat against the vacant post of Shop Assistant BPS-07.

Ends: No. KP-TEVTA/HR-1/2-1/1063(1-5)

MANAGING DIRECTOR

Dated: 13/02/2019

Copy forwarded for information & necessary action to:

- 1- The District Accounts Officers concerned.
- 2- PA to the Managing Director, KP-TEVTA.
- 3- The Principals concerned.
- 4- The Officials concerned.
- 5- Office copy.

DEPUTY DIRECTOR (EST)

5	Mr. Saleem Nawaz Shop Attendant BPS-03 GCT D.I.Khan	Govt. College of Technology, Kohat against the vacant post of Shop Assistant BPS-07
6	Mr. Jaffar Shah Shop Attendant BPS-03 GTVC (B), Ghazni Khel, Lakki Marwat	Govt. College of Technology, Kohat against the vacant post of Shop Assistant BPS-07
7	Mr. Darwaish Khan Shop Attendant BPS-03 GCT, Nowshera.	Govt. College of Technology, Swat against the vacant post of Shop Assistant BPS-07
8	Mr. Mian Rafi Ullah Shop Attendant BPS-03 GCT, Nowshera	Govt. College of Technology, Nowshera against the vacant post of Shop Assistant BPS-07
9	Mr. Jehangir Khan Shop Attendant BPS-03 GCT, Bannu.	Govt. College of Technology, Kohat against the vacant post of Shop Assistant BPS-07

MANAGING DIRECTOR

Dated 13/02/2019

Endst. No. KP-TEVTA/HR-1/2-1/1063 (1-5)

Copy forwarded for information & necessary action to:

1. The District Accounts Officer concerned.
2. PA to the Managing Director, KP TEVTA
3. The principals concerned.
4. Official concerned.
5. Office copy

-sd-

DEPUTY DIRECTOR (ESTT)

جناب عالی سائل درج ذیل عرض گزار ہے۔

"D" - 15 -

الف۔ یہ کہ سائل عرصہ 18/04/94 سے بطور شاپ انڈنٹ آپ کے زیر سایہ ڈیوٹی سرانجام دے رہا ہے۔ جب کہ دوران ڈیوٹی سائل کے خلاف کسی قسم کی شکایت درج نہ ہوئی ہے۔ جیسا کہ لف ریکارڈ سے ظاہر ہے۔
ب۔ یہ کہ سائل کے کاغذات برائے پر دوشن باعہدہ شاپ اسٹنٹ آپ کے پاس پہنچ چکے تھے۔ جس کے لئے سائل کو D.P.C کے لئے مورخہ 5 دسمبر کو بلا دیا گیا۔ سائل D.P.C ممبران کے سامنے پیش ہوا۔ سائل کو D.P.C میں سلیکشن کی نوید سنائی گئی۔ کیونکہ سائل کے کاغذات D.P.C ممبران کے معیار پورا کرتے تھے۔
ج۔ یہ کہ سائل کو یہ بھی کہا گیا۔ کہ آپ کو پر دوشن ارڈر مل جائے گا۔ لیکن سائل کو پر دوشن ارڈر کی بجائے اپنے حق سے بھی محروم کر دیا گیا۔ کیونکہ ایک Non Eligible ہلکار کو سائل پر ترجیح دی گئی۔ جو کہ کسی بھی لحاظ سے اس پر دوشن کا مجھ سے پہلے حق دار نہیں تھا۔

1۔ یہ کہ D.P.C کال لٹر کے حوالہ نمبر KP.tevta/HR/DPC/5879(1-9) کے معیار میں یہ بھی ہے۔ کہ جو ہلکار D.P.C کے سامنے پیش نہ ہوا۔ اسے پر دوشن کے لئے نا اہل تصور کیا جائے گا۔ تو اسی معیار کے مطابق مزکورہ اہل جو کہ سنیاری لیٹ میں 13 ویں نمبر پر ہے۔ نہ تو D.P.C کے سامنے پیش ہوا ہے اور نہ انڈنٹس لیٹ میں اسکی حاضری درج ہے۔ جو کہ انڈنٹس لیٹ نوٹو کاپی سے صاف ظاہر ہے۔

2۔ یہ کہ جن ہلکاروں کے پر دوشن ہوئے ہیں۔ ان کی سرٹیفیکیشن کی ویری فیکیشن کیجائے۔ اور ساتھ میں سائل کو بھی ویری فائیڈ کیا جائے۔ تاکہ یہ پتہ چلے کہ کون پر دوشن کا حق دار ہے۔ اور کون نہیں ہے۔ تاکہ نا انصافی کا احتمال نہ رہے۔

3۔ یہ کہ سائل کے ڈاکوٹیشن کو جناب پرنسپل G.C.T جنوں نے بحوالہ لٹر نمبر 758 مورخہ 31/3/18 کو ارسال کیا ہے۔ جس میں صاف طور پر سائل کے کاغذات کے بارے میں اور پر دوشن کی سفارش کی گئی ہے۔ لیکن باوجود اس کے سب خیرکات میرے حق میں ہے۔ پھر بھی مجھے پر دوشن سے ڈراپ کیا گیا ہے۔ جو کہ میری حق تلفی ہے۔

4۔ یہ کہ یہ بات سچ ہے۔ مذکورہ ہلکار جو کہ سنیاری لیٹ میں 13 ویں نمبر پر ہے۔ نوٹو کاپی کے لحاظ سے مجھ سے ستر ہے جبکہ T.P.C کے لحاظ سے اور D.P.C کے کوڈز کنڈکٹ کے لحاظ سے وہ اس پر دوشن کا اہل تھا۔

5۔ یہ کہ لٹر بحوالہ نمبر SO iii (IND) 4.13.2015 میں صاف لکھا گیا ہے۔ کہ وہ اہل کار جو حاضر مردوں ہوں اسے کوڈ کے مطابق 20% کوڈ میں ان ہلکاروں کو ترجیح دی جائے گی۔ جن کے پاس بڑے شکیکٹ اور گورنٹ کا منظور شدہ ٹیکنیکل ادارے سے ٹرینڈ شکیکٹ لیا ہو۔ جبکہ سائل اس بات پر بھی پورا اترتا ہے۔

6۔ یہ کہ بحوالہ لٹر نمبر KP.TEVTA/HR.1.2867 (1.17) 12/6/2018 کے مطابق مزکورہ سنیاری لیٹ میں نمبر 13 کا ہلکار پر دوشن کا حق دار نہیں ہے۔ کیونکہ اس لٹر کے معیار پر پورا نہیں اترتا۔ مگر پھر بھی اسے پر دوشن دی گئی ہے۔ جو کہ سراسر نا انصافی ہے۔

7۔ یہ کہ سائل اس نا انصافی کو پہلے آپ کے نوٹس میں لانا چاہتا ہے۔ اگر آپ کے زیر سایہ مجھے میرا حق ناملا تو آپ نے حق کے لئے عدالت جانے کا حق محفوظ رکھتا ہوں۔ کیونکہ یہ سائل کے ساتھ صریح نا انصافی ہے۔ لہذا بذریعہ درخواست استدعا ہے۔ کہ سائل کو حق پر دوشن دے کر سائل کی وادری کیجائے۔ اور سائل کی حق تلفی نہ ہو۔ تمام کاغذات کے نوٹو کاپی لف درخواست کیجائی ہے۔ تاکہ آپ کو حق رسائی میں کوئی دقت نہ ہو۔ سائل دعا گو رہیگا۔

العارض

مورخہ: 18 فروری 2019

سائل محسب اللہ خان شاپ انڈنٹ گورنٹ کالج ایف بی ٹی ٹی بی
فون نمبر۔ 03348682734-5 CNIC: 11101-1462644-5

کاپی برائے اطلاع

1۔ چیف سکریٹری خیبر پختونخواہ پشاور

2۔ ڈائریکٹر ایمن ایج کے پی ٹی پشاور

3۔ کورڈینیٹر پی۔ ایم۔ اے۔ یو۔ سول سکریٹ پشاور

3۔ انٹیشن کسٹرن

ATTENTION

-16-

To

The Managing Director
KP TEVTA PESHAWAR.

SUBJECT; Promotion from Shop Attendant to Shop Assistant.

R / sir

Reference to my application copy enclosed here with, on account of promotion case of shop attendant to shop assistant the applicant still waited for your honorable response.

I hope the applicant will not be disappointed in this regard

Thanks.

Dated. 14/3/2019.

Yours obediently



Mr shams ullah khan

Shop attendant G C T Bannu

Copy for information :-

- 01- Chief secretary KPK Peshawar .
- 02- Director Admin / H R K P TEVTA .
03. Coordinator P.M.R.U Peshawar.

ATTACHED

26/3

REMIENDER No.2

- 17 -

The Managing Director
KP-TEVTA, Peshawar.

Subject:- Promotion from Shop Attendant to Shop Assistant.

R/Sir,

Respectfully reference to my application attached herewith in connection of promotion case from shop attendant to Shop assistant and 1st remainder (Copy Attach) of the applicant still waiting for your response as per service rules and regulation obviously the applicant will knocked at the door of High Court after the deprival of right in my department as promotion from Shop Attendant to Shop Assistant as ,I have already eligible of the service rules of the KP-TEVTA .

Thanks

Obediently Your's

Dated. 29-03-2019



Mr. Shams Ullah Khan
Shop Attendant GCT, Bannu
CNIC No. 11101-1462644-5
Mobile No. 0334-8682734.

Copy for information to ;

1. Chief Secretary Khyber Pakhtoon Khawa Peshawar.
2. The Director Adman/ HR KP-TEVTA Peshawar.
3. Coordinator PMRU Peshawar.
4. Official Concern.

ATTESTED

Assistant Manager (BPS-11).	<p>recognized Board with G-I Level Course and Apprenticeship Training Course in the relevant trade from a recognized Institute; or</p> <p>(ii) Secondary School Certificate from a recognized Board with G-II Level Training Course from a recognized Institute having three year experience in the relevant trade.</p>		<p>from amongst the Junior Trade Instructors (BPS-10) and Draftsman (BPS-10) with seven years service as such having six months Instructor Training Course from a recognized Institute:</p> <p>Provided that if no suitable person is available for promotion then by initial recruitment; and</p> <p>(b) eighty percent by initial recruitment.</p>
Junior Trade Instructor (BPS-10).	<p>(i) G-II Level Course in the relevant Trade from a recognized Board; or</p> <p>(ii) Secondary School Certificate from a recognized Board with G-III Level Training Course from a recognized Institute or Trade Proficiency Certificate with seven years experience.</p>	21-28 years	<p>(a) Twenty percent by promotion, on the basis of seniority cum fitness, from amongst the Shop Assistants (BPS-06) having six months Instructor Training Course and Trade Proficiency Certificate from a recognized Institute with five years service experience as such; and</p> <p>Provided that if no suitable person is available for promotion then by initial recruitment; and</p> <p>(b) eighty percent by initial recruitment.</p>
Draftsman (BPS-10).	<p>(i) G-II level course in the relevant Trade from a recognized Institute; or</p> <p>(ii) Secondary School Certificate from a recognized Board with G-III Level Training Course or Trade Proficiency Certificate from a recognized Institute having seven years experience in the relevant Trade.</p>	21-28 years	<p>(a) Twenty percent by promotion, on the basis of seniority cum fitness, from amongst the Shop Assistants (BPS-6) with six months Instructor Training Course and Trade Proficiency Certificate from a recognized Institute:</p> <p>Provided that if no suitable person is available for promotion then by initial recruitment; and</p> <p>(b) eighty percent by initial recruitment.</p>
Shop Assistant (BPS-6).	<p>(i) Secondary School Certificate from a recognized Board with G-III Level Course from a recognized Institute; or</p>	21-28 years	<p>(a) Twenty percent by promotion, from amongst the Shop Attendants Having Secondary School Certificate from a recognized Board with five years service as such and Trade Proficiency Certificate from a recognized Institute:</p>

20-1

ATTN: [unclear]

22/4/15
 Section 3
 Industries, Fisheries
 Manpower and
 Trade Education Deptt
 Govt of P.F.E.

G. THE [unclear] TO GOVT. OF P.F.E.

21-
Secretary
Technical Education

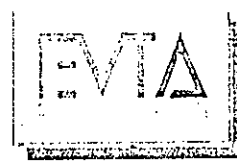
9	Shop Attendant (BPS-1).	(ii) Secondary School Certificate from a recognized Board with Trade Proficiency Certificate from a recognized Institute. Secondary School Certificate from a recognized Board	21-28 years.	By initial recruitment. Provided that if no suitable person is available for promotion then by initial recruitment; and (b) eighty percent by initial recruitment.
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22/11/15

Secretary
Technical Education
Govt. of K.P.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
INDUSTRIES, COMMERCE & TECHNICAL EDUCATION
DEPARTMENT

RECEIVED
22/11/15



No. KP-TEVTA/HR-DPCI 5879(19) -22- Dated. 1/11/2018.

- To
1. Mr. Dilbar Khan, Shop Attendant BPS-03, GTVC(B), Takhtbai, Mardan.
 2. Mr. Zahir Shah, Shop Attendant BPS-03, GTVC(B), Takhtbai, Mardan.
 3. Mr. Shamsuddin, Shop Attendant BPS-03, GPI, Wari, Dir.
 4. Mr. Saleem Nawaz, Shop Attendant BPS-03, GCT, DIKhen.
 5. Mr. Jaffar Shah, Shop Attendant BPS-03, GTVC(B), Lakki.
 6. Mr. Darwaish Khan, Shop Attendant BPS-03, GCT, Swat.
 7. Mr. Mian Rafiullah, Shop Attendant BPS-03, GCT, Nowshera.
 8. Mr. Shamasullah, Shop Attendant BPS-03, GCT, Bannu.
 9. Mr. Faisal Khan, Shop Attendant BPS-03, GCT, Abbotabad.

Subject: APPEARING BEFORE THE DEPARTMENTAL PROMOTION COMMITTEE:

I am directed to refer to the subject noted above and to inform that a meeting of the Departmental Promotion Committee has been scheduled to be held on 05-12-2018 at 11:00 a.m. in the KP-TEVTA Head Office. As per the seniority list, your name appears in the promotion zone for the post of Shop Assistant BPS-07 and which will be accordingly considered by the committee.

You are, therefore, directed to appear before the committee in your own interest on the date and time mentioned above, along with the following original documents for the perusal of the committee.

1. N.I.C.
2. Secondary School Certificate.
3. Trade Proficiency Certificate obtained from the recognized institution.
4. Domicile Certificate.

In case of your non-appearance, your promotion case may be foregone /deferred by the committee.

DEPUTY DIRECTOR(EST)

No. KP-TEVTA/HR/DPCI/

Dated. 1/11/2018.

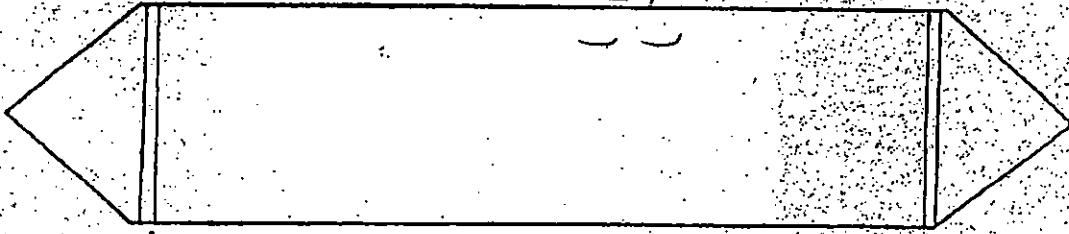
Copy of the above is forwarded for information to all the Principal concerned with the request to accordingly depute the above officials on the specified date for the purpose.

DEPUTY DIRECTOR(EST)

ATTESTED

-23-

بعدالت عالمہ



شمس اللہ بنام نورگسٹو

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیردی و جواب وہی دکل کاروائی متعلقہ
آن مقام کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل بااختیار ہوگا۔ نیز
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل بااختیار ہوگا۔ نیز
دیکل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب وہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجرام اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیردی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیردی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بااختیارات حاصل ہوں گے اور اس کا ساختہ
برواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیردی
مذکور کریں۔ لہذا وکالت نامہ لکھدیا کہ سندر ہے۔

الزقوم _____ ماہ _____ 20

کے لئے منظور ہے۔

نورگسٹو

بمقام

Accepted

قیمت
50 روپے

25247

ایڈووکیٹ: Bashir Khan Wajid

بار کونسل/ایسوسی ایشن نمبر: kc-09-2053

رابطہ نمبر: 0333-9752415



پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: صدر میں سر محمد علی احمد خٹک پختونخواہ

Respondent # 4	منجانب:	دعویٰ: Appeal
شخص اللہ		علت نمبر:
بنام		مورخہ:
محبت علیہ		جرم:
		تھانہ:

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام پشاور کیلئے لیسٹیم ضامن و ترسہ اہلک کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پرداختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المقوم: 2/9/2019

Accepted by: [Signature]

الع بد گواہ شد الع

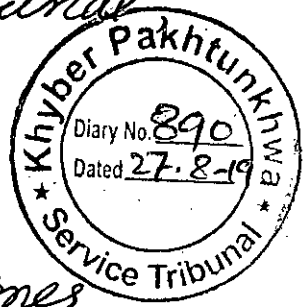
مقام پشاور کے لیے منظور ہے۔

جی بلور خان شاہ صاحب
بیت گورنمنٹ لائبریری کالج پشاور
Respondent No. 4

To

Page 1 of 2

Registrar,
Khyber Pakhtunkhwa Service Tribunal
Peshawar.



MS Appeal No. 732 of 2019

Mr. Shams Ullah Appellant/Petitioner

put up to the court with
relevant app.

Versus

MD KP-TEVTA Peshawar

Respondent No. 4

27/8/19

Needs

Respected Sir,

With all due respect it is stated
I have the required qualifications and
was eligible for said promotion and
hence promoted.

Initially I was declared as ineligible
due to non-submission of Trade Proficiency
certificate in KP-TEVTA, while the same
certificate was acquired by me in
2014.

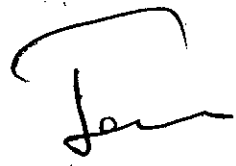
Later on I submitted the Trade
Proficiency certificate which was
accepted and verified by head office

as my certificate is duly registered and recognized by Board of Technical and Professional Education Islamabad with registration No. MCPS/BNU/ET/1749/2013.

My certificate can ^{also} be verified online on official website of said Board www.btpe.edu.pk.

It is therefore requested that the appeal of Mr. Shams Ullah may be withdrawn please as it is based on baseless accusations.

Submitted please!


24/08/2019
Mr. Jehangir Khan
Shop Assistant (BPS-17)
Respondent No. 4



Board of Technical & Professional Education Islamabad (Pakistan)

VERIFICATION LETTER

TO WHOM IT MAY CONCERN:

It is to certify that the certificate/diploma issued in favor of Mr. Jehangir Khan Sana Ullah Khan, vide Registration No. MCPS/BNU/ET/1749/2013 and Roll No. 2639, Matrix College of Professional Studies (MCPS) Bannu trained and elevated by (MCPS) Bannu in the trade of Diploma in Electrical Supervision one year is found genuine according to this office record with the following transcript:

Total Marks	Marks Obtained	Percentage	Grade
1000	780	78%	B+

Attested

[Signature]
Assistant Professor
Govt. College of Technology
Bannu

[Signature]
Secretary
BTPE
BTPE ISLAMABAD

Nº 007415



**BOARD OF INTERMEDIATE & SECONDARY EDUCATION
B A N N U.**

DETAILED MARKS CERTIFICATE

**Secondary School Certificate Examination
(GENERAL GROUP)**

Session 19 91 (Annual/Supplementary)

Name

Jehangir Khan

Father's Name

Sayyidullah Khan

Roll No. 4703

SUBJECT	Total Number of Marks Allotted	MARKS OBTAINED	
		In figures	In words
1. English	150	53	
2. Urdu	150	55	
3. Islamiyat Comp:	75	29	
4. Pakistan Studies	75	33	
5. Gen. Mathematics	100	33	
6. General Science	100	50	
7. Art	100	35	
8. AS	100		
Total	850	339-F	Three hundred thirty nine

This certificate is issued errors and omissions excepted.

Prepared by

Checked by

Date

19

Controller of Examinations
Board of Intermediate & Secondary Education
B A N N U.

Attested

Assistant Professor
Govt. Collage of Technology
Bannu

Roll No. 4703

No 003861



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Bannu N.W.F.P. Pakistan
Secondary School Certificate Examination
SESSION ANNUAL/SUPP. 1991

THIS IS TO CERTIFY THAT Jehangir Khan

Son/Daughter of Sanaullah Khan

and a student of Bannu Distt:

has passed the Secondary School Certificate Examination
of the Board of Intermediate and Secondary Education, Bannu.

as a Private candidate. He/She obtained 339 Marks out of 850

and has been placed in Grade E Representing Satisfactory

The Candidate passed in the following subjects.

- | | | | |
|------------|---------------------|-----------------|-------------------|
| 1. English | 3. Islamiyat | 5. Gen: Science | 7. Gen: Maths |
| 2. Urdu | 4. Pakistan Studies | 6. Art | 8. Islam: Studies |

He/She has been awarded Grade / on the basis of internal
assessment by the institution concerned.

Date of birth according to admission form is Twenty Seven January
one thousand nine hundred and Seventy One (27.1.1971)

D. Nigwar
Asst. Secretary
28 JUL 1991

This certificate is issued without alteration or erasure.

Secretary

Attested

[Signature]

Assistant Professor
Govt. College of Technology
Bannu

TRIBAL DOMICILE CERTIFICATE.

t. Mr. Mohammed Tabangis
Sama Jital Wani is a recognized member of the
Frontier Regions Bannu and is entitled to all privileges and
concessions admissible to other tribesman.

He is bonafide resident of village Bamba
of Frontier Regions Bannu and verified by the Assistant Political
Frontier Regions Bannu.

No. 2562 / PC
Dated 1/1/1977

Security Commissioner, Frontier Regions Bannu

Attested

[Signature]

Assistant Commissioner
Frontier Regions Bannu

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No.732/2019

**Shams Ullah, Shop Attendant,
Govt. College of Technology, Bannu.....APPELLANT.**

VERSUS

**Government of Khyber Pakhtunkhwa through Secretary Industries,
Civil Secretariat, Peshawar, and others.....RESPONDENTS**

I N D E X

S. No	Description	Annexure	Page No
1	Reply		1-2
2	Affidavit		3
3.	Minutes of DPC	A	4-5
4.	Letter 1.11.2018	B	6
5.	Working Paper	C	7-8

40

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No.732/2019

**Shams Ullah, Shop Attendant,
Govt. College of Technology, Bannu.....APPELLANT.**

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Industries,
Civil Secretariat, Peshawar, and others.....RESPONDENTS

Respectfully Sheweth

PRELIMINARY OBJECTIONS:

- A- That the appellant has got no locus standi.
- B- That the appeal is incompetent in its present form for non joinder of the necessary parties.
- C- That the appellant has not come to this honorable tribunal with clean hands.
- D- That the appellant has been estopped by his own conduct to file the present appeal.

FACTS:

1. Pertains to appellant official record.
2. Pertains to record. It is further clarified that through the said letter the incumbents were directed to submit their verified documents. Besides, the officials not possessing the requisite certificate i.e. Trade Proficiency Certificate were also directed to submit certificates if they possess. The officials provided the requisite certificates in time. On the provision of the requisite Bio data / verified credentials, they were declared eligible and their names were included in the working paper prepared for the promotion of Shop Attendants to be presented before DPC. Against the 09 vacant posts of Shop Assistants BPS-7 a panel of 12 officials according to the seniority list was presented before DPC for consideration. Consequent upon the recommendation of DPC 09 officials were promoted to the post of Shop Assistant BPS-7. Minutes of DPC meeting held on 24.1.2019 at Annexure-A.
3. It pertains to record but with further clarification that the incumbents who had deficient qualification were also directed vide office letter dated 1.11.2018 to contact KP-TEVTA head office in case they possess the requisite qualifications at Annexure-B. On the provision of the requisite documents the incumbents senior to the appellant, were declared eligible for promotion as they met the required criteria well before the meeting of DPC.
4. No comments.

5. It is absolutely incorrect. Respondents No.3, 4 and 5 are senior to the appellant. On the provision of the deficient documents / certificate their names were included in the working paper. After fulfilling all the codal formalities their case was presented in the DPC and accordingly they were promoted.

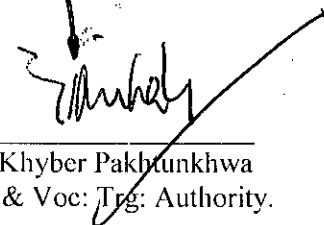
GROUND'S

- a) It is incorrect.
- b) It is incorrect.
- c) In the same letter the deficient documents were also asked for to submit if the incumbents possess the require qualification. On the provision of these documents the respondents No. 3 to 5 were declared as eligible. Annexure-C
- d) On the provision of the requisite certificates in time, their eligibility was determined and accordingly their names were included in the panel of promotion.
- e) The date of DPC was postponed and the meeting was held on 24.1.2019.
- f) Needs no comments.
- g) Needs no comments.
- h) On the same date another letter was issued to the respondents No. 3 to 5 annexed abid.
- i) The appellant case will be considered for promotion on his own turn and on the availability of the post.
- j) No comments.
- k) No comments.

No right of the appellant has been violated.

In view of the above, it is therefore, requested that the service appeal may please be dismissed.

Respondent No.2) 
Secretary Industries, Khyber Pakhtunkhwa,
Peshawar.

Respondent No.4) 
Managing Director, Khyber Pakhtunkhwa
Technical Education & Voc: Trg: Authority.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No.732/2019

**Shams Ullah, Shop Attendant,
Govt. College of Technology, Bannu.....APPELLANT.**

VERSUS

**Government of Khyber Pakhtunkhwa through Secretary Industries,
Civil Secretariat, Peshawar, and others.....RESPONDENTS**

AFFIDAVIT

I Shahab-ud-Din Khattak, Legal Coordinator of Technical & Vocational Training Authority Khyber Pakhtunkhwa Peshawar do hereby solemnly affirm and declare that contents of the accompanying reply are true to the best of my knowledge and belief.


DEPONENT

17301-6527091-5

0334-9199058

MINUTES OF THE DEPARTMENTAL PROMOTION COMMITTEE

MEETING HELD ON 24-01-2019:

Annex-A
(9)

A meeting of the Departmental Promotion Committee was held under the chairmanship of Managing Director, KP-TEVTA on 24-01-2019 in KP-TEVTA Head Office regarding the promotion of Shop Attendants BPS-03 against the available 09 posts of Shop Assistants BPS-07. The following members of the committee attended the meeting:


1. Mr. Nazir Ahmed, Director(Admn & HR), KP-TEVTA.
2. Mr. Rehmanuddin, Director(Finance), KP-TEVTA.
3. Mr. Hameed ur Rehman, Section Officer-III, IC&TF Deptt.
4. Mr. Shah Riaz Haider, Deputy Director(Estt), KP-TEVTA.

The committee thoroughly examined the relevant Service Rules, number of available vacancies, due share of promotion of the Shop Attendants, credentials of the candidates for promotion and recorded its findings as under:

Sr	Name of Official	Findings of the Departmental Promotion Committee
1-	Mr. Muhammad Nazem, GCT, Swabi	The official does not possess the requisite Trade Proficiency Certificate as per requirement of the Service Rules. Hence he was found ineligible for promotion.
2-	Mr. Dilbar Khan, GIVC, Takhtbai	The Official is standing at Sr. No.2 of the seniority list. He possesses Matric certificate and 06 months G-III Trade Proficiency Certificate with more than 5 years service at his credit. He also possesses 6 months special training course certificate from Ghazi Brotha Training programme. The committee found him eligible for promotion. The official is, therefore, recommended for promotion as Shop Assistant BPS-07.
3-	Mr. Niamatullah, GTI, Ekkaghand	The Official is standing at Sr. No.3 of the seniority list. He possesses Matric certificate and 6 months intensive training course in carpentry with more than 5 years service at his credit. The committee found him eligible for promotion. The official is, therefore, recommended for promotion as Shop Assistant BPS-07.
4-	Mr. Zahir Shah, GIVC, Takhtbai.	The Official is standing at Sr. No.4 of the seniority list. He possesses Matric certificate and G-II level trade proficiency certificate obtained from TTB, Peshawar with more than 5 years service at his credit. The committee found him eligible for promotion. The official is, therefore, recommended for promotion as Shop Assistant BPS-07.
5-	Mr. Shamsuddin, GPI, Dir.	The Official is standing at Sr. No.6 of the seniority list. He possesses Matric certificate and G-II level certificate with more than 5 years service at his credit. The committee found him eligible for promotion. The official is, therefore, recommended for promotion as Shop Assistant BPS-07.
6-	Mr. Saleem Nawaz, GCT, DIKhan	The Official is standing at Sr. No.7 of the seniority list. He possesses Matric certificate and G-III level National Occupational Skill Standards Certificate from GTTC, DI Khan with more than 5 years service at his credit. The committee found him eligible for promotion. The official is, therefore, recommended for promotion as Shop Assistant BPS-07.
7-	Mr. Waheed Khan, GCT, Peshawar	The official does not possess the requisite qualifications as per requirement of the Service Rules. Hence he was found ineligible for promotion.
8-	Mr. Jaffar Shah, GIVC, Lakki	The Official is standing at Sr. No.9 of the seniority list. He possesses Matric certificate and a Trade Proficiency Certificate in Auto with more than 5 years service at his credit. The committee found him eligible for promotion. The official is, therefore, recommended for promotion as Shop Assistant BPS-07.
9-	Mr. Darwaish Khan, GCT, Swat.	The Official is standing at Sr. No.10 of the seniority list. He possesses Matric certificate and 6 months proficiency certificate in carpentry with more than 5 years service at his credit. The committee found him eligible for promotion. The official is, therefore, recommended for promotion as Shop Assistant BPS-07.

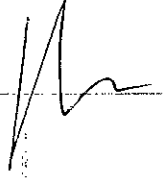
10	Mr. Mian Rafiullah, GCT, Nowshera.	The Official is standing at Sr. No.11 of the seniority list. He possesses Matric certificate and 6 months Trade Proficiency Certificate with more than 5 years service at his credit. The committee found him eligible for promotion. The official is, therefore, recommended for promotion as Shop Assistant BPS-07.
11	Mr. Wajid Khan, GCT, Bannu.	The official does not possess the requisite Trade Proficiency Certificate as per requirement of the Service Rules. Hence he was found ineligible for promotion.
12	Mr. Jehangir Khan, GCT, Bannu	The Official is standing at Sr. No.13 of the seniority list. He possesses Matric certificate and 1 year Diploma in Electrical Supervisor with more than 5 years service at his credit. The committee found him eligible for promotion. The official is, therefore, recommended for promotion as Shop Assistant BPS-07.

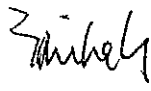
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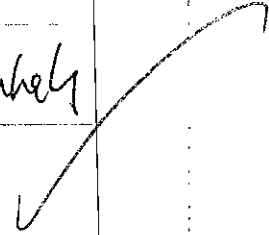
1. Director(Admin & HR), KP-TEVTA. 

2. Director(Finance), KP-TEVTA 

3. Section Officer-III, ICTE Deptt: 

4. Deputy Director(List), KP-TEVTA. 

Approved by: Managing Director, KP-TEVTA 

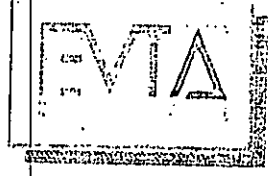


-6-

Annex-B



KHYBER PAKHTUNKHWA TECHNICAL
EDUCATION & VOCATIONAL TRAINING
AUTHORITY OLD BARA ROAD
UNIVERSITY TOWN, PESHAWAR



No. KP-TEVTA/HR/ 5878(1-7)
To

Dated. 1/11/2018.

1. Mr. Muhammad Naccm, Shop Attendant BP03, GCT, Swabi.
2. ✓ Mr. Niamatullah, Shop Attendant BPS-03, GTI, Yakaghund.
3. Mr. Misal Khan, Shop Attendant BPS-03, GCT, Nowshera.
4. Mr. Waheed Khan, Shop Attendant BPS-03, GCT, Peshawar.
5. Mr. Wajid Khan, Shop Attendant BPS-03, GCT, Bannu.
6. Mr. Jehangir Khan, Shop Attendant BPS-03, GCT, Bannu.
7. ✓ Mr. Muhammad Iqbal, Shop Attendant BPS-03, GTVC(B)Charsadda.
8. ✓ Mr. Shaheen shah, Shop Attendant BPS-03, GTI, Sadda.
9. ✓ Mr. Muhammad Ilyas, Shop Attendant BPS-03, GPI, Haripur.

Subject: - DEFICIENT QUALIFICATION :

I am directed to refer to the subject noted above and to inform you that as per the relevant rules, the requisite qualification for promotion of Shop Attendant BPS-03 to the post of Shop Assistant BPS-06 is Matric with Trade Proficiency Certificate from a recognized institute. The perusal of record transpire that you have the deficient qualification and is, therefore, ineligible for promotion to the post of Shop Assistant BPS-07.

In case you possess the requisite qualifications as mentioned above, you are required to immediately contact the KP-TEVTA Head Office through your Principal concerned well before 30-11-2018 in your own interest.

DEPUTY DIRECTOR (Estt)

WORKING PAPER

Annex-C
7 WS

SUBJECT: PROMOTION OF SHOP ATTENDANTS BPS-03 AGAINST THE POST OF SHOP ASSISTANT BPS-07:

Nine (09) posts of Shop Assistant BPS-7 are lying vacant at Government Colleges of Technology/ Government Polytechnic Institutes/ Government Technical Teachers Training College/ Government Technical Institutes which are required to be filled by promotion of the Shop Attendants BPS-03 of the department.

2. As per the existing Service Rules, 2015, the following method of recruitment has been prescribed for filling the post of Shop Assistant BPS-07 (Annex-I).

- Eighty percent by initial recruitment and
- Twenty percent by promotion, from amongst the Shop Attendants having Secondary School Certificate from a recognized Board with five years service as such and Trade Proficiency Certificate from a recognized Institute:

3. There are total 293 sanctioned posts of Shop Assistant BPS-07 in Government Colleges of Technology/ Government Polytechnic Institutes/ Government Technical Teachers Training College/Govt. Technical & Vocational Centres. Out of these, 238 posts @ of 80% , fall to the share of initial recruitment quota while 52 posts @ of 20%, fall to the share of promotion. So far, out of 52 posts, only 24 posts have been filled by promotion of the Shop Attendants while the remaining 28 posts are yet to be filled by promotion of the Shop Attendants BPS-03.

4. At present 09 posts of Shop Assistants BPS-07 are lying vacant at GCTs/GTVCs due to retirement of the incumbents of the posts. (Annex-II) All these posts fall to the share of promotion of Shop Attendants BPS-03 @ 20%, as per rules.

5. According to the seniority list (Annex-III), the following Shop Attendants possess the requisite qualification and are eligible for promotion to the post of Shop Assistant BPS-07.


Sr. #	Name of incumbent/DOB/Posting	Qualification/ Trainings	Date of Regular appointment to the present post.	Whether completed prescribed length of service.	Whether eligible for promotion otherwise.	for or
1-	Muhammad Iqbal/08-4-66/VC, Swabi	i) Matric	07-10-1985	Yes	Ineligible. Lacks TPC	X
2-	A. Dilbar Khan/01-6-17/VC, Fakhribai	i) Matric ii. 06 months G-III Trade Proficiency Certificate. iii. 6 months special training course from Ghazi Brotha Training Program.	27-04-1988	Yes	Eligible	✓
3-	Niamatullah/7-19-66/VC, Ekkaghund	Matric ii. 6 months intensive training course in carpentry.	16-08-1988	Yes	Eligible.	✓
4-	M. Zahir Shah/1-7-70/VC, Fakhribai.	i) Matric ii). G-II level Cert. from TTB.	01-07-1989	Yes	Eligible	✓
5-	Misra Khan/73/VC, Nowshera.	i) Matric	05-08-1989	Yes	Retired on 31-07-2013. Ineligible. Lacks TPC	X
6-	M. Shamsuddin/1-19-70/VC, Dir	i. Matric ii). G-II level Cert.	25-02-1990	Yes	Eligible	✓


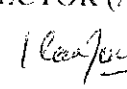
7-	Mr. Saleem Nawaz /20-4-64/ GCT, DIKhan	i) Matric ii. One year certificate from GTTC, DIKhan	20-06-1990	Yes	Eligible
8-	Mr. Wahced Khan 06-3-1971, GCT, Peshawar	Middle.	1-11-1990	Yes	Ineligible. Lacks Matric plus TPC
9-	Mr. Jallir Shah 6-4-1967/ GTVC, Lakki	Matric and Auto Trade Certificate	01-12-1991	Yes	Eligible
10	Mr. Darwaish Khan 01-4-1968/ GCT, Swat.	Matric with 6 months carpentry Certificate	10-07-1993	Yes	Eligible
11	Mr. Mian Rafiqullah. 10-09-1973, GCT, Nowshera.	FA with 6 months Trade Certificate	01-08-1993	Yes	Eligible
12	Mr. Wajid Khan, 15-06-1963/ GCT, Bannu.	Matric	12-06-1994	Yes	Ineligible. Lacks TPC
13	Mr. Jehangir Khan 27-01-1971/ GCT, Bannu	Matric ii. 1 year Diploma in Electrical Supervisor	12-06-1994	Yes.	Eligible.
14	Mr. Shamsullah 15-01-1973/ GCT, Bannu.	Matric with G-II certificate	18-07-1994	Yes	Eligible
15	Mr. Muhammad Iqbal 01-5-1967/ GTVC(W), Charsadda.	Matric	16-11-1994	Yes	Ineligible. Lacks TPC
16	Mr. Faisal Khan, 23-08-1975/ GCT, Abbotabad	DAE(Civil)	13-04-1995	Yes	Eligible.
17	Mr. Shaheen Shah 1-1-75/ GTI, Sadda	FA ii. 6 months certificate in Tailoring.	15-11-95	Yes	Eligible.
18	Mr. Muhammad Ilyas, 10-12-75 GTVC KTS, Haripur	Matric iii. 6 months training course in welding.	10-12-1975	Yes	Eligible

6. It is certified that:-

- 1- All of the aforementioned officials holding the posts on regular basis.
- 2- No Departmental Examination has been prescribed for the instant promotions.
- 3- Neither disciplinary / departmental proceeding/ anti-corruption case/judicial enquiry are pending against any of these officials nor was any penalty imposed on them.

The Departmental Promotion Committee is requested to determine the suitability and qualifications of the officials for their promotion against the 09 posts of Shop Assistant BPS-07.


DIRECTOR (ADMN&HR).

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR.

S.A# 732/2019

ShamsUllah

VERSUS

Gout & others.

Application For withdrawal
of the case.

Respectfully sheweth;

① That the above titled appeal is pending adjudication before this Honorable Tribunal which is fixed for today.

② That the applicant/appellant does not want to pursue the case anymore and wants to withdraw the case unconditionally, hence this application.

③ That there is no embargo in withdrawal of the case at any stage of the proceedings.

It is therefore, respectfully prayed that on acceptance of this Application, the appeal may kindly be withdrawn.

Dated:- 18 November, 2021

Through, ^{Petitioner}
Fazal Shah Motimand, A.S.C.
& Rabia Muzaffar Advocate.