

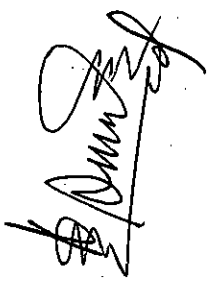
1  
Appeal no. 761/2020

10.01.2022

Counsel for the appellant and Mr. Kabirullah Khattak, Addl. AG for the respondents present. Preliminary arguments have been heard and record perused.

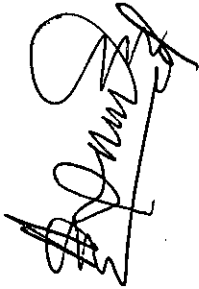
The appellant has invoked the jurisdiction of this Tribunal with the prayer as copied below:-

*"On acceptance of this appeal, the respondents may be directed to consider the appellant for promotion to the post of Junior Clerk under 33% quota fixed by the Government from his due date/availability of fund with all consequential benefits or any other remedy which this august Tribunal deems fit and appropriate that may also be awarded in favour of appellant."*



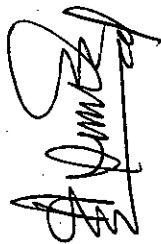
The appeal was filed on 31.01.2020 and is still going through the course of preliminary hearing. According to the proceedings reflected in order sheet dated 23.12.2020, pre-admission notice was given to the respondents. Therefore, they are in attendance through learned AAG. Private respondents also entered in proceedings through their counsel. In different order sheets, request for adjournment for submission of the written reply has been reflected but no order sheet reflects as to submission of the comments, while parawise comments on behalf of respondents No. 1 & 2 are available in the file. It is asserted vide para-4 of the said comments that the appellant had already filed an appeal No. 304/2014 asking the same relief in which final order was issued by the Tribunal on 27.10.2017 with the decision that the respondents should calculate the quota of the promotees in accordance with the prevalent rules at different stages and then they should consider all those who are eligible and fit for promotion at different stages.

Then in 2018, the appellant filed an Execution Petition No. 43/2018 in Appeal No. 304/2014 for implementation in which the respondents submitted an implementation report. A Copy of this Tribunal's order has been annexed with the said comments. According to titled page of Appeal No. 304/2014 annexed with the order dated 27.10.2017 the prayer in the said appeal was also the same rather verbatim as now in the present appeal and copied above. There is an order dated 30.12.2019 which was passed in execution petition No. 43/2018. According to the titled page of the execution petition as available alongwith certified copy of the said order, the same was filed seeking the implementation of the order dated 27.10.2017 passed in appeal No. 304/2014 by this Tribunal. According to contents of the said order the then learned counsel stated before the Tribunal that after passing of the judgment under implementation another seniority list was issued by the respondents wherein juniors to the petitioner were allocated positions senior to him. Therefore, desire of the petitioner to pursue legal remedy available to him on account of seniority list was pressed into service with the request for consigning the execution proceedings to the record room with the reservation of his rights as stated above. Consequently, the execution proceedings were consigned to the record room with liberty to the petitioner to proceed against the seniority list or any other instruments whereby his service rights were adversely affected.




As far as the prayer in the present service appeal as copied above and in the previous service appeal decided vide order dated 27.10.2017 are concerned, the same are indistinguishable and main contesting parties are also the same. Therefore, the present appeal with the same prayer, having already been adjudicated upon is not maintainable within the meaning of Rule 23 of the Khyber

Pakhtunkhwa Service Tribunal Rules, 1974 and its rejection is inevitable. However, the case of the appellant in view of his previous litigation is required to be reconsidered for further proceedings in execution of the previous order dated 27.10.2017 passed in Service Appeal No. 304/2014. I am mindful of the fact that the petitioner himself requested for consignment of the execution petition in pursuance of his desire to file the present appeal but this Tribunal is vested with power under Rule 27 of the Khyber Pakhtunkhwa Service Tribunal Rules, 1974 to make such order as may be necessary for the ends of justice. It seems that the execution petition No. 43/2018 as filed by the present appellant was got consigned to the record room vide order dated 30.12.2019 because of some misunderstanding or miscomprehension of the scope of the order under execution. The order dated 27.10.2017 passed in Service Appeal No. 304/2014 is still intact and its execution is possible having regard to its letter & spirit. In order to delineate the scope of the executable part of the said order, it is observed that the respondents were directed thereby that they should calculate the quota of promotees in accordance with the prevalent rules at different stages and then they should consider all those who are eligible and fit for promotion at different stages. The spirit of the said order is very much clear that it was aimed at calculation of the quota of the promotees for the relevant posts and to grant them promotion after determination of their eligibility and fitness for promotion at different stages. So it was required on part of the department to demonstrative the compliance of the said order that they should have brought the Working Paper before the Tribunal showing the number of posts available in the quota of the promotees for the relevant posts and then to show whether the petitioner in the execution



petition was eligible for promotion or not. Therefore, while rejecting the present appeal on the principle of *resjudicata*, the execution petition No. 43/2018 is restored for further proceedings in view of the scope of the order dated 27.07.2017 as delineated herein above.

This file be consigned to the record room and file of execution petition No. 43/2018 be recovered from the record and register on its original number for further proceedings on 20/01/2022 before S.B. Copy of this order be filed on E.P File.

  
Chairman

15/01/22

29.09.2021

Counsel for the appellant present. Addl: AG for official respondents and counsel for private respondents present.

Written reply not submitted. Learned AAG as well as counsel for private respondents seek time to furnish reply/comments. Request is accorded. To come up for reply/preliminary hearing before the S.B on 18.11.2021.

  
(MIAN MUHAMMAD)  
MEMBER (E)

18.11.2021

Appellant in person present. Mr. Kabirullah Khattak, Addl: AG alongwith Mr. Masood Khan, ADEO for respondents No.1 and 2 and private respondent No.4 and 5 present.

Written reply not submitted. Requests for further time to submit the same on the next date. Adjourned. To come up for reply/preliminary hearing before the S.B on 15.12.2021.

  
(MIAN MUHAMMAD)  
MEMBER (E)

15.12.2021

Learned counsel for the appellant present.

Learned counsel for the appellant seeks adjournment to prepare the brief. Adjourned. To come up for preliminary hearing on 10.01.2022 before S.B.

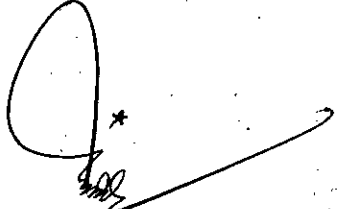
  
(MIAN MUHAMMAD)  
MEMBER (E)

18.03.2021

Appellant in person present. Addl: AG for respondents present.

Written reply not submitted. Learned AAG seeks time to contact the respondents for submission of reply.

Adjourned to 01.07.2021, before S.B.

  
(Mian Muhammad)  
Member (E)

01.07.2021

Counsel for the appellant, Mr. Muhammad Adeel Butt, Addl. AG alongwith Masood Khan, ADO and Syed Nauman Bukhari, Advocate for private respondents present.

Learned AAG as well as counsel for private respondents seek time to furnish reply/comments. Request is accorded. To come up for reply/preliminary hearing on 29.09.2021 before S.B.

  
Chairman

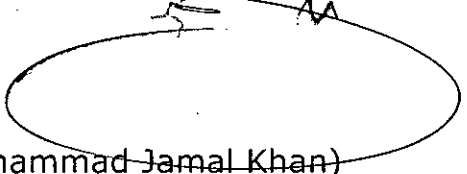
~~Counsel for the appellant present~~

~~Learned counsel for the appellant requested for adjournment on the ground that he has not prepared the brief. Adjourned. To come up for preliminary hearing before the CTD on 29.09.2021.~~

~~(Mian Muhammad)~~  
~~Member (E)~~

22.10.2020

Since the Members of the High Court as well as of the District Bar Association Peshawar are observing strike today, therefore, the case is adjourned to 23.12.2020 on which date to come up for preliminary hearing before S.B.

  
(Muhammad Jamal Khan)  
Member (Judicial)

23.12.2020

Appellant with counsel present.

Learned counsel states that the present appellant filed service appeal in this Tribunal which was decided in his favor where-after execution petition was filed and it was on 30.12.2019 when Tribunal was informed in respect of another seniority list issued by the Department after passing of judgment in favor of the present appellant in view of his request, execution proceedings were consigned to the record room and keeping in view the desire of the appellant to pursue legal remedy on account of seniority list was reserved and he was left at liberty to proceed against the seniority list or any other instrument whereby his service rights have been adversely affected, in accordance with law.

Now, the appellant has filed the instant service appeal for direction to respondents to consider the appellant for promotion but despite hectic efforts, he was not provided with the relevant seniority list and other necessary documents by the respondent department. In view of the above, pre-admission notice be issued to respondents. To come up for reply and preliminary hearing on 18.03.2021 before S.B.

  
(Rozina Rehman)  
Member (J)

11.03.2020

Learned counsel for the appellant present. It appeared that the appellant has earlier filed Service appeal in the year 2014 bearing No:304/2014 decided on 27.10.2017, on the same cause of action. Learned counsel for the appellant seeks adjournment to furnish the relevant seniority list, other necessary documents and to further prepare the brief. Adjourn. To come up for preliminary arguments on 27.04.2020 before S.B.

0.000/1/18

  
Member

0.000/1/18

27.04.2020

Due to COVID-19, the case is adjourned to 03.08.2020 for the same, before S.B.

  
Reader

03.08.2020

None for the appellant is present at the moment i.e 2:25 P.M. On last date, case was adjourned due to spread of COVID-19 Pandemic, therefore, appellant as well as his counsel be issued notices for 22.10.2020. File to come up for preliminary hearing before S.B.

  
(MUHAMMAD JAMAL KHAN)  
MEMBER

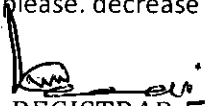



Form- A

FORM OF ORDER SHEET

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

Case No.- 761 /2020


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	31/01/2020	<p>The appeal of Mr. Abdur Rahim resubmitted today by Mr. Gohar Ali Khaishgi Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please. decrease</p> <p style="text-align: right;"> REGISTRAR - 31/1/2020</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>11/03/2020</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

The appeal of Mr. Abdur Rehim Class-IV GHSS Khweshgi Payan Nowshera received today i.e. on 15.01.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ✓ ① Copies of judgment passed in appeal no. 321/2012 and 322/2012 mentioned in para-3 of the memo of appeal (Annexure-H) are not attached with the appeal which may be placed on it.
- ✓ 2- Annexures of the appeal may be attested.
- ✓ 3- Annexures of the appeal may be flagged.
- ✓ 4- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- ✓ 5- Annexures-K & H of the appeal are illegible which may be replaced by legible/better one.
- ✓ 6- Annexure-L of the appeal is incomplete which may be completed.
- ✓ ⑦ Copies of intermediate certificate and Degree of B.A mentioned in the memo of appeal are not attached with the appeal which may be placed on it.
- ✓ ⑧ Copies of promotion orders of orders of private respondents mentioned in the memo of appeal are not attached with the appeal which may be placed on it.

No. 117 /S.T,


Dt. 16-01- /2020.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Gohar Ali Kheshgi Adv. Pesh.

R/Sir

re submitted after completion please.

  
Gohar Ali Kheshgi Adv. Pesh.  
23/1/2020

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

Service Appeal No. 761 /2020

Mr. Abdur Rahim.....(Appellant)

**V E R S U S**

The Director Education, Elementary and Secondary  
Education and others.....(Respondents)

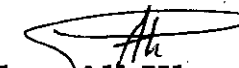
**I N D E X**

S.No	Description of Documents	Annex	Pages
1.	Service Appeal		1-6
2.	Affidavit		7
3.	Addresses of the parties		8
4.	Copy of Appointment Order	A	9
5.	Copy of Certificates	B to G	10-16
6.	Copy of the judgment	H	17-20
7.	Copy of judgment of Tribunal and seniority list	I	21-28
8.	Copy of Departmental Appeal	J	29
9.	Copy of order of respondents No. 4 to 6 by respondents (impugned)	K	30-31
10.	Copy of the judgment	L	32-33
11.	Wakalat Nama		34

  
Appellant

Through

Dated: 15/01/2020

  
**Gohar Ali Khesghi**  
Advocate High Court,  
Peshawar.  
Cell No. 0345-908294

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

Service Appeal No. 761 /2020

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 433

Dated 15-01-2020

Mr. Abdur Rahim, Class-IV, Government Higher Secondary School, Khweshgi Payan, Nowshera.....(Appellant)

**V E R S U S**

1. The Director Education, Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. The DEO (Elementary and Secondary Education), Nowshera.
3. The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
4. Mohammad Ayaz S/o Muhammad Sharif (Laboratory Attendant, now Clerk at Government High School Kheshgi Bala, Nowshera).
5. Hamid Ali S/o Janis Khan (Mali, Now Junior Clerk at Government High School Kotarpan, Nowshera).
6. Inam Ullah S/o Inayat Ullah (Daftari now Junior Clerk at Government High School Alibaig, Nowshera)...(Respondents)

**APPEAL U/S 4 OF KHYBER**

**PAKHTUNKHWA SERVICE TRIBUNAL,**

**1974, FOR DIRECTION THE**

**RESPONDENTS TO CONSIDER THE**

**APPELLANT FOR PROMOTION TO THE**

**POST OF JUNIOR CLERK UNDER 33%**

**FIXED QUOTA BY THE GOVERNMENT**

Filed to-day

Registrar

15/01/2020

Re-submitted to-day  
and filed.

Registrar

31/01/2020

2

w.e.f HIS JUNIOR COLLEGES  
(RESPONDENTS NO. 4 TO 6) ARE  
PROMOTED AND AGAINST NOT TAKING  
ANY ACTION ON THE DEPARTMENTAL  
APPEAL OF THE APPELLANT.

**PRAYER:**

*On acceptance of this appeal, the respondents may be directed to consider the appellant for promotion to the post of Junior Clerk 33% Quota fixed by the Government from his due date/ availability of fund with all consequential benefits or any other remedy which this august Tribunal deems fit and appropriate that may also be awarded in favour of appellant.*

**Respectfully Sheweth:**

The facts giving rise to the following Appeal of the appellant are as under:

1. That the appellant joined the respondents department on 19/10/1992. The appellant more than 21 years service with good record throughout

at his credit. (Copy of Appointment Order is attached as annexure "A").

2. That the appellant is highly qualified and has passed SSC, Intermediate, Bachelor of Arts, Typing Course, PTC, Computer Certificate & Service Certificate with more than 21 years experience. (Copy of Certificates are attached as annexure "B", "C", "D", "E", "F" & "G").
3. That the Government of KPK has fixed 33% quota for Class-V with SSC Qualification for the promotion to the post of Junior Clerk. But despite of the fixed quota and having eligibility, the appellant was never consider for promotion o the post of Junior Clerk, while other colleagues juniors to the appellant have been considered for promotion as reference Appeal No. 321/2012 and 322/2012. (Copy of the judgment is attached as annexure "H").
4. That appellant filed appeal of such nature without making respondents the junior once as they were not in the knowledge of the appellant so who seniority list submitted by respondents department,

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so due coming in to knowledge this appeal has been filed to submit again. (Copy of judgment of Tribunal is attached as annexure "I").

5. That the appellant filed Departmental Appeal for his claim on 27/09/2019 and waited for 90 days, but no reply has been received by the appellant to the appeal so far, hence the present appeal on the following grounds amongst the others. (Copy of Departmental Appeal is attached as annexure "J").

**GROUND:**

- A. That not granting pay benefits of higher post of Junior Clerk and not considering the appellant for regular promotion under 33% quota is against the norms of justice and material on record.
- B. That the appellant is senior most eligible and qualified Class-IV Employee and he is entitled to be promoted as Junior Clerk under 33% reserved quota.

- C. That the appellant has been kept deprived from his legal right of promotion which is not tenable under the norms of justice and fair play as the junior respondents No. 4 to 6, have been already promoted while respondent No. 6 promoted is not existed in seniority list.
  
- D. That the respondent department has never observed 33% quota, rather the department promoted the most junior person under 33% quota who were junior to appellant. Thus, the promotion order issued by the respondent department of the most junior person is highly discriminatory and based on nepotism. (Copy of order of respondents No. 4 to 6 by respondents (impugned) is attached as annexure "K").
  
- E. That, similar appeals have already been decided by this august Tribunal Appeal No. 796/2008 decided on 30/01/2009, Appeal No. 1604/2010 decided on 21/01/2011 and Appeal No. 104/2011, and No. 323/2011 decided on 11/01/2012. Thus, the appellant also deserves the same treatment under the principle of consistency being similarly placed



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person. (Copy of the judgment is attached as annexure "L").


- F. That the appellant has not been treated according to law, rules governing the 33% quota of appellant.
- G. That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is, therefore, humbly prayed that the appeal of the appellant may be accepted as prayed for with all back benefits.

  
Appellant

Through

Dated: 15/01/2020

  
**Gohar Ali Khesghi**  
Advocate High Court,  
Peshawar.

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

Service Appeal No. \_\_\_\_\_/2020

Mr. Abdur Rahim.....(Appellant)

**V E R S U S**

The Director Education, Elementary and Secondary  
Education and others.....(Respondents)

**AFFIDAVIT**

I, **Mr. Abdur Rahim**, Class-IV, Government Higher  
Secondary School, Khweshgi Payan, Nowshera, do hereby  
solemnly affirm and declare that all the contents of the  
accompanying **Service Appeal** are true and correct to the  
best of my knowledge and belief and nothing has been  
concealed from this Hon'ble Tribunal.



*Abdur Rahim*

**DEPONENT**

CNIC: 171017118923-7

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

Service Appeal No. \_\_\_\_\_/2020

Mr. Abdur Rahim.....(Appellant)

**V E R S U S**

The Director Education, Elementary and Secondary  
Education and others.....(Respondents)

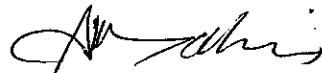
**ADDRESSES OF THE PARTIES**

**APPELLANT:**

Mr. Abdur Rahim, Class-IV, Government Higher Secondary  
School, Khweshgi Payan, Nowshera.

**RESPONDENTS:**

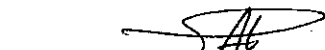
1. The Director Education Elementary and Secondary  
Education, Khyber Pakhtunkhwa, Peshawar.
2. The DEO (Elementary and Secondary Education),  
Nowshera.
3. The Secretary Finance Department, Khyber Pakhtunkhwa,  
Peshawar.
4. Mohammad Ayaz S/o Muhammad Sharif (Laboratory  
Attendant, now Clerk at Government High School Kheshgi  
Bala, Nowshera).
5. Hamid Ali S/o Janis Khan (Mali, Now Junior Clerk at  
Government High School Kotarpan, Nowshera).
6. Inam Ullah S/o Inayat Ullah (Daftari now Junior Clerk at  
Government High School Alibaig, Nowshera).



Appellant

Through

Dated: 15/01/2020



**Gohar Ali Kheshgi**  
Advocate High Court,  
Peshawar.

A  
P-9

FORM NO. 3088

OFFICER OF THE DISTRICT EDUCATION OFFICER (MALE) SECONDARY NOWSHERA.  
APPOINTMENT.

Consequent upon selection/Re-Commandation of the Selection Committee, Mr. Abdur Raheem S/O Raza Khan. candidate is hereby appointed against post of Naib Qasid. in BPS: No. I of Rs; = 920-26-1340 PM plus usual allowances as admissible under the rules with effect from the date of his taking over charge at G.M.S. Watter against the Vacant/ N.C.P./Leave on the terms and conditions noted below:-

TERMS & CONDITION:-

1. The appointment is purely temporary and liable to termination at any time without assigning any reason or notice.
2. In case of resignation they will have to submit one month prior notice to the Deptt: or forfeit one month Pay from the Govt: Servant/.
3. They are required to produce Health and Age Certificate form ~~from~~ the Medical authorities concerned before taking over charge in case they are not Govt; Servant.
4. They are not allowed to take over charge if their age is less than 18 Years and above than 45 Years.
5. All original Educational Character and domicile certificate must be verified by the Head of Institution concerned before handing over charge.
6. If they fail to take over charge of the post within seven days from the issue of this order the appointment will be automatically considered as cancelled.
7. Charge report should be submitted to all concerned.
8. No. TA/DA etc is allowed.

*(Signature)*  
19.10.92  
(MOHAMMAD ZAMAN KHAN)  
DISTRICT EDUCATION OFFICER,  
(MALE) SECY: NOWSHERA.

Enclst; No. 8732-34 /F.No: A- 10 /App: dated NSR: 19.10. /92.  
Copy forwarded for information and n/a to the:-

- 1:- District Accounts Officer Nowshera.
- 2;= Head Master, GMS, Watter.
- 3;- Candidate concerned.
- 4:- Personal File.

*(Signature)*

*(Signature)*  
19.10.92  
DISTRICT EDUCATION OFFICER

B  
P-10

S. No. **PBR- 0014150**



Roll No. 16851

# BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



## Peshawar N.W.F.P. Pakistan Secondary School Certificate Examination

SESSION 1991 (ANNUAL)  
(HUMANITIES GROUP)

THIS IS TO CERTIFY THAT Abdur Raheem Khan

Son/Daughter of Raza Khan

and a student of Govt High School No:1 Charsadda

has passed the *Secondary School Certificate Examination*  
of the Board of Intermediate and Secondary Education, Peshawar held in March 1991  
as a *Regular candidate*. He/She obtained 383 Marks out of 850  
and has been placed in Grade  D Representing Fair

The Candidate passed in the following subjects:

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

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

Date of birth according to admission form is Ninth October  
one thousand nine hundred and Seventy Five (09-10-1975)

Asstt: Secretary  
10th July 1991.

G. U.S.S. Kheshgi Payag  
This certificate is issued without alteration or erasure.

Secretary

C  
P-11


78795

786

S.B. /PC

Roll No. 10190

**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION**



Peshawar N.W.F.P. Pakistan  
**PROVISIONAL CERTIFICATE**  
 INTERMEDIATE EXAMINATION

F.A

Session 95 Annual/Supplementary

Arts Group

THIS IS TO CERTIFY THAT Abdur Rahim

Son/daughter of Raza Khan

and a candidate of Charsadda Distt

Registered No. \_\_\_\_\_ has passed the INTERMEDIATE EXAMINATION of the Board of Intermediate & Secondary Education, Peshawar held in Jan 19 96

as a Regular/Private candidate. He/She obtained 400 Marks out of 1100 and has been placed in Grade (E) Representing Satisfactory

The Examination was taken as a whole/in parts.

Prepared by [Signature]  
Checked by [Signature]

Date of Preparation \_\_\_\_\_

[Signature]  
 Asstt. Secretary (certificates)  
 ASSTT. SECRETARY (CERTS.)  
 Board of Intermediate & Secondary Education  
 Peshawar

University of ...

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129

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Ms. 03830H

97-92-11063

51263

98-11-58

Registration No. ...  
Roll No. ...  
It is declared on ...

...  
The Controller of Examinations  
University of ...

...

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P-13

# FRONTIER TYPE & SHORT HAND COLLEGE



Teh: Chowk Mills Road, Distt: Charsadda (NWFP) Pakistan.  
Head Office Mardan.

## CERTIFICATE

This is to Certify that Mr. Abdur Rahim s/o Raza Khan  
resident of Vill: Fazal Abad No.2 (Mira Prang) Teh: & Distt: Charsadda.  
has undergone ~~Typing/Short Hand~~ Training courses in this  
institute under my supervision from 11.04.1992 to 11.07.1992.  
He took keen interest in his studies during the training period.

At the time of termination of the course his speed of  
~~Typing/Short Hand~~ found was 30 / Thirty words  
per minute. ~~respectively.~~

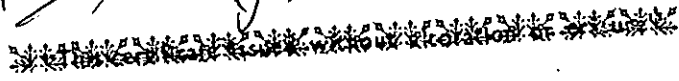
Wishing him good luck & success in his future life.

Date... 12.07.1992.

*Abbas*  
Principal

*[Signature]*  
Principal  
G.I.S.S. Khasgi  
Nowshera

*[Signature]*  
Principal Director







P-17 H  
**BEFORE THE PROVINCIAL SERVICE TRIBUNAL, PESHAWAR**

APPEAL NO. 321 /2012

Mr. Muhammad Ayaz, Lab. Attendant,  
GHSS, Kheshgi Payan, Nowshera,

VERSUS

329  
08/03/2012  
**APPELLANT**

1. The District Coordination Officer, Nowshera.
2. The EDO (E&SE), Nowshera.
3. The Secretary, Finance Department, Govt. of KPK, Peshawar.

**RESPONDENTS**

**APPEAL UNDER SECTION-4 OF THE KPK SERVICE TRIBUNAL ACT 1974 FOR DIRECTING THE RESPONDENT TO CONSIDER THE APPELLANT FOR PROMOTION TO THE POST OF JUNIOR CLERK UNDER 33% QUOTA FIXED BY THE GOVERNMENT AND AGAINST NOT TAKEN ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF 90 DAYS.**

**PRAYER:**

That on acceptance of this appeal, the respondents may be directed to consider the appellant for promotion to the post of junior clerk under 33% quota fixed by the government from his due date/availability of the post with all consequential benefits. Any other remedy which this august tribunal deems fit and proper that may also be awarded in favour of appellant.

**R. SHEWETH;**

1. That the appellant joined the respondent department on 29.12.1998 as Lab Attendant (Class-IV). The appellant more than 13 years service with good record through out at his credit. Copy of Order is attached as Annexure-A.
2. That the appellant is highly qualified and has passed M.A, PTC, Typing Course and with 13 years experience. Copies of

7.12.2012

Clerk to counsel for the appellant, and Mr. Arshad Alam, AGP with Muhammad Irfan, ADO and Inayatullah, ADO for the respondents present. Reply filed. Copy handed over to Clerk to counsel for the appellant. To come up for arguments on 23.5.2013. Rejoinder, if any, in the meantime.

MEMBER

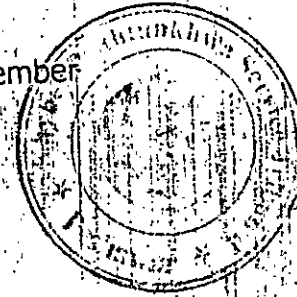
MEMBER

8.2.2013

Counsel for the appellant present and submitted an application for early hearing instead of 23.5.2013. To come up for arguments on 22.3.2013 instead of 23.5.2013. Notices be issued to the respondents.

Member

Member



22.03.2013

Appellant with counsel, Mr. Arshad Alam AGP with Muhammad Irshad, SO (Litigation) and Muhammad Irfan, ADO for the respondents. Arguments heard and record perused. Vide our detailed judgment of to-day in connected appeal No. 320/2010, Inamullah Versus DCO Nowshera etc.", this appeal is also accepted as per detailed judgment. Parties are left to bear their own costs. File be consigned to the record.

ANNOUNCED  
22.3.2013

MEMBER

MEMBER

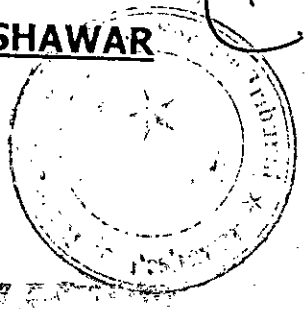
Certified to be true copy

Secretary  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

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23-01-2020

**BEFORE THE PROVINCIAL SERVICE TRIBUNAL, PESHAWAR**

APPEAL NO. 322 /2012



Mr. Hamid Ali S/O Janis Khan,  
Mali Class-IV, Govt. High School Rashakai,  
Nowshera.

328  
Dated 08/03/2012

**APPELLANT**

VERSUS

1. The District Coordination Officer, Nowshera.
2. The EDO (E&SE), Nowshera.
3. The Secretary, Finance Department, Govt. of KPK, Peshawar.

**RESPONDENTS**

**APPEAL UNDER SECTION-4 OF THE KPK SERVICE TRIBUNAL ACT 1974 FOR DIRECTING THE RESPONDENT TO CONSIDER THE APPELLANT FOR PROMOTION TO THE POST OF JUNIOR CLERK UNDER 33% QUOTA FIXED BY THE GOVERNMENT AND AGAINST NOT TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF 90 DAYS.**

**PRAYER:**

That on acceptance of this appeal, the respondents may be directed to consider the appellant for promotion to the post of junior clerk under 33% quota fixed by the government from his due date/availability of the post with all consequential benefits. Any other remedy which this august tribunal deems fit and proper that may also be awarded in favour of appellant.

Handwritten signature and date: 8/3/12

**R. SHEWETH:**

1. That the appellant joined the respondent department on 08.12.1998 as Mali (Class-IV). The appellant more than 13 years service with good record through out at his credit. Copy of Order is attached as Annexure-A

Handwritten signature and stamp: Khy. Service Tribunal, Peshawar

7.12.2012

Clerk to counsel for the appellant, and Mr. Arshad Alam, AGP with Muhammad Irfan, ADO and Inayatullah, ADO for the respondents present. Reply filed. Copy handed over to Clerk to counsel for the appellant. To come up for arguments on 23.5.2013. Rejoinder, if any, in the meantime.

MEMBER

MEMBER

8.2.2013

Counsel for the appellant present and submitted an application for early hearing instead of 23.5.2013. To come up for arguments on 22.3.2013 instead of 23.5.2013. Notices be issued to the respondents.

Member

Member

22.03.2013

Appellant with counsel, Mr. Arshad Alam, AGP with Muhammad Irshad, SO (Litigation) and Muhammad Irfan, ADO for the respondents. Arguments heard and record perused. Vide our detailed judgment of to-day in connected appeal No. 320/2010, Inamullah Versus DCO-Nowshera etc., this appeal is also accepted as per detailed judgment. Parties are left to bear their own costs. File be consigned to the record.

ANNOUNCED  
22.3.2013

MEMBER

MEMBER

Certified true copy  
Khyber Pakhtunkhwa  
Peshawar

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(10) old list Annex I  
 OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ELEMENTARY & SECONDARY EDUCATION, NOWSHERA  
 Tentative Seniority List of Class-IV OF Ele: & Secy: Education, Nowshera

Sr	Name of Class-IV	Father's Name	Designation	Division	Name of School	Qualification	Date of Birth	Date of 1st Appn. in Edu Dept.	Date of taking over post in	Date of taking over charge in this Dist.	Mobile #
	1	Gohar Ali Shah	N/Q	NSR	GMS, Waf	S.S.C	29/02/1956	09/01/1975	09/01/1975	09/01/1975	0344-7140584
	2	Bakht Ali	Lab: Attend	NSR	GHS, Khesghi Bala	S.S.C	03/01/1957	21/09/1981	21/09/1981	21/09/1981	0925-640121
	3	Ranat Shah	Lab: Attend	NSR	GHSS, Akbar Pura	S.S.C	14/09/1966	15/09/1984	15/09/1984	15/09/1984	0307-7120151
	4	Jan Khan	N/Q	NSR	GHS, Khesghi Baiz	S.S.C	10/04/1967	16/09/1985	16/09/1985	16/09/1985	0923-640121
	5	Munawar Shah	Chowkidar	NSR	GHS, Aza Khei Bala	S.S.C	10/10/1961	02/05/1986	02/05/1986	02/05/1986	0342-3179513
	6	Wilayat Khan	Chowkidar	NSR	GPS Mohib Banda	F.A, PTC	08/05/1959	12/01/1987	12/01/1987	12/01/1987	0352-9011559
	7	Akhter Munir	Chowkidar	NSR	GPS Dag Behsud No2	S.S.C	17/04/1972	10/09/1987	10/09/1987	10/09/1987	0301-5092610
	8	Mukhtaj ud Din	N/Q	NSR	GHS, Jarooba	S.S.C	15/05/1955	21/10/1987	21/10/1987	21/10/1987	
	9	Iqbal Husain	Chowkidar	NSR	GPS Gul Rehan	S.S.C	04/01/1967	29/10/1987	29/10/1987	29/10/1987	
	10	Khalid Khan	Chowkidar	NSR	GHSS, Nizampur	S.S.C	01/01/1968	29/10/1987	29/10/1987	29/10/1987	
	11	Taj Rahim	Chowkidar	NSR	GPS, Kund	S.S.C	02/01/1958	07/01/1988	07/01/1988	07/01/1988	
	12	Nazir Ahmad	Chowkidar	NSR	GPS, No.1 Akora	S.S.C	14/09/1969	26/01/1988	26/01/1988	14/02/1988	0333-9049839
	13	Amreesh Khan	Lab: Attend	NSR	GHS, Mughalkai	S.S.C	10/02/1966	14/02/1988	14/02/1988	01/06/1988	0300-5376656
	14	Fida Muhammad	N/Q	NSR	GHS, Spin Khak	S.S.C	13/12/1970	01/06/1988	01/06/1988	01/06/1988	0374-5900251
	15	Rang Wali Shah	Chowkidar	NSR	GPS.1 Azakhel Payan	S.S.C	03/12/1967	11/06/1988	11/06/1988	11/06/1988	0300-5895620
	16	Saeed Ullah	Chowkidar	NSR	GPS.2 Pabi	S.S.C	04/10/1965	21/09/1988	22/09/1988	22/09/1988	0333-9261461
	17	Niaz Muhammad	Chowkidar	NSR	GPS Dag Behsud No1	S.S.C	10/10/1970	27/09/1988	27/09/1988	27/09/1988	
	18	Farzand Ali	Chowkidar	NSR	GPS, No:1 Mulla Kili	S.S.C	04/03/1968	04/11/1988	04/11/1988	04/11/1988	
	19	Ihsan Ul Haq	Chowkidar	NSR	GPS, Sherin Koty	S.S.C	10/01/1961	30/10/1989	11/01/1989	11/01/1989	
	20	Hamid Afzal	Behishti	NSR	GPS, No.2 Pir Pai	S.S.C	02/04/1971	07/09/1989	07/09/1989	07/09/1989	0300-9239507
	21	Muhammad Ismail	Lab: Attend	Chard	GHS, Aman Garh	S.S.C	14/05/1964	09/09/1989	09/09/1989	09/09/1989	0300-9367253
	22	Mehrab Gul	N/Q	NSR	GHS, Badrashi	S.S.C	01/04/1972	11/10/1989	11/10/1989	11/10/1989	0331-4320943
	23	Mir Haider	Chowkidar	NSR	GPS Ashakhel	S.S.C	12/09/1973	20/12/1989	20/12/1989	20/12/1989	0301-3011694
	24	Haider Khan	Chowkidar	NSR	GPS No1 Cantt	S.S.C	14/08/1969	05/02/1990	05/02/1990	05/02/1990	
	25	Fazal Ahmad Shah	Chowkidar	NSR	GPS Gul Renan	S.S.C	14/08/1969	11/04/1990	11/05/1990	11/05/1990	
	26	Syed Zahir Shah	N/Q	NSR	GHSS, Taru Jabba	F.A	02/11/1972	01/07/1990	15/10/1990	15/10/1990	
	27	Sajam Gul	Lab: Attend	NSR	GHS, Mali Khei Bala	M.A / B.Ed	05/03/1969	15/10/1990	20/11/1990	20/11/1990	
	28	Ali Muhammad	Chowkidar	NSR	GPS, Sees Mandi	S.S.C	14/06/1970	20/11/1990	20/11/1990	01/01/1991	0345-9868120
	29	Mir Azam Khan	N/Q	NSR	GMS, Hisar Tang	S.S.C	06/11/1969	01/01/1991	01/01/1991	18/01/1991	
	30	Noor ul Islami	Chowkidar	NSR	GPS, sheikh Ahmad Baba	S.S.C	20/03/1970	18/07/1991	18/07/1991	02/02/1991	
	31	Aziz ul Akbar	Chowkidar	NSR	GPS, Darwazgai	F.A	25/11/1961	02/02/1991	02/02/1991	03/05/1991	
	32	Tufail	Sweeper	NSR	EDO(E & SE) Nowshera	S.S.C	06/11/1974	08/05/1991	08/05/1991	16/05/1991	

A. Usman

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OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ELEMENTARY & SECONDARY EDUCATION, NOWSHERA

Tentative Seniority List of Class-IV OF Ele: & Secy: Education, Nowshera

S #	Name of Class-IV	Father's Name	Designation	Dimicil	Name of School	Qualificatio	Date of Birth	Date of 1st Apptt: in Edu. Deptt.	Date of taking over charge	Date of taking over charge in this Distt.	Mobile #
34	Muhammad Ibrahim	Renman Gui	Chowkidar	Chd	GPS, Kandar	S.S.C		16/05/1991	16/05/1991	16/05/1991	
35	Riaz Amin	Hazrat Umar	Chowkidar	NSR	GPS A C Center	S.S.C	19/05/1997	18/05/1991	18/05/1991	18/05/1991	
36	Muhammad Tariq	Abdur Rauf	Chowkidar	NSR	GPS, Risal garh	F.A	10/06/1956	01/10/1991	01/10/1991	01/10/1991	
37	Zafar Iqbal	Musharaf Khan	Lab: Attend	NSR	GHS, Dag Behsud	S.S.C	06/01/1975	21/10/1991	21/10/1991	21/10/1991	0312-5771794
38	Mushtaq Khan	Abdul Ghaffar	Mali	NSR	GHS, Aman Garh	S.S.C	21/09/1962	13/11/1991	13/11/1991	13/11/1991	
39	Nosherawan Khan	Sher Afzal	Lab: Attend	NSR	GHSS, Jallozai	F.A	03/10/1970	07/01/1992	07/01/1992	07/01/1992	0331-4704922
40	Jan Alam	Fazli Elahi	Sweeper	Chd	GHS, Mulla Killi	F.A	15/03/1964	01/06/1992	01/06/1992	01/06/1992	0345-9087327
41	Fida Muhammad	Tayyeb ur Rahman	Sweeper	Chard	GHS, Khesghi Bala	B.A / C.T	16/06/1961	23/09/1992	23/09/1992	23/09/1992	0923-640121
42	Abdur Rahman	Raza Khan	Sweeper	Chd	GHSS, Khesghi Payan	B.A	09/10/1975	20/10/1992	20/10/1992	20/10/1992	
43	Races Khan	Fareed Khan	N/Q	Chard	GHS, Khesghi Bala	S.S.C	05/03/1975	15/11/1992	15/11/1992	15/11/1992	0923-640121
44	Khial Nawab	Khanadin	Chowkidar	NSR	GHS, Phari Katti Khel	S.S.C	16/01/1971	01/01/1993	01/01/1993	01/01/1993	
45	Falak Naz	Musharaf Khan	Mali		GHS, Tarkha	S.S.C	01/04/1966	18/04/1993	18/04/1993	18/04/1993	0315-9208925
46	Muhammad A. Mai	Luqman din	Behishti	NSR	GHS, No.1 Shaidu	S.S.C	12/05/1972	29/09/1993	29/09/1993	29/09/1993	
47	Khalid Khan	Aseem Khan	Behishti	Swabi	GHS, Adamzai	S.S.C	10/06/1967	03/10/1993	03/10/1993	03/10/1993	0346-9545717
48	Nadeem Akhtar	Ali Akbar	N/Q	NSR	GCMHS, Akora Khatak	S.S.C	01/05/1970	05/10/1993	05/10/1993	05/10/1993	0336-9432128
49	Inam Ullah	Faqir Muhammad	N/Q	Pesh	GMS, Chowki Mamrez	S.S.C	02/01/1977	19/10/1993	19/10/1993	19/10/1993	0313-9709463
50	Walayat Khan	Zarbat Khan	N/Q	NSR	GMS, Spin Kana Kalan	F.A	09/05/1969	20/10/1993	20/10/1993	20/10/1993	0305-9728919
51	Muzamel Khan	Zulkifal	N/Q	NSR	GHS, Tarkha	S.S.C	25/12/1971	14/05/1994	14/05/1994	14/05/1994	0344-5904144
52	Muhammad Shabir	Usra Khan	Chowkidar	NSR	GPS, Shaheen Abad	S.S.C	10/11/1975	31/08/1994	31/08/1994	31/08/1994	
53	Shahma Gul	Samin Gul	Chowkidar	NSR	GPS, Rokhan abad	F.A	03/03/1970	11/01/1995	11/01/1995	11/01/1995	
54	Taila Muhammad	Ghulam Haider	Chowkidar	NSR	GPS, Duran abad	S.S.C	02/01/1952	11/01/1995	11/05/1995	11/01/1995	
55	Abdul Hanan	Shamran Khan	N/Q	NSR	GMS, Kana Khel	S.S.C	01/01/1975	01/02/1995	01/02/1995	01/02/1995	0347-9014601
56	Awal Khan	Khan Said	Chowkidar	NSR	GPS No 2 Shaikhi	S.S.C	20/10/1976	11/06/1995	11/07/1995	11/07/1995	
57	Saeedur Rahman	Habibul Rahman	Behishti	NSR	GHS, Zakhi Qabristan	S.S.C	13/04/1977	01/09/1995	01/09/1995	01/09/1995	0301-8833859
58	Shabir ud Din	Lal Din	Chowkidar	NSR	GPS, Namdar khel	S.S.C	01/07/1970	10/10/1995	10/10/1995	10/10/1995	
59	Khurshid Zada	Khan Zada	Lab: Attend	NSR	GHS, Kahi	S.S.C	02/02/1976	01/01/1996	01/01/1996	01/01/1996	0302-3514508
60	Sher Badshah	Mir Badshah	Chowkidar	NSR	GPS, Chashmai	S.S.C	24/02/1963	30/04/1996	30/04/1996	30/04/1996	0334-8952877
61	Gul Faraz	Maiva Gui	Chowkidar	NSR	GPS Mairaji Payan	S.S.C	17/12/1978	10/10/1996	17/10/1996	17/10/1996	
62	Amir Gul	Habib Gul	Khakroob	NSR	GHS, No.1 Shaidu	S.S.C	07/08/1974	12/11/1996	12/11/1996	12/11/1996	
63	Javid Khan	Hameedul Ghafoor	Sweeper	NSR	GMS, Islamabad	F.A	20/04/1972	23/06/1997	23/06/1997	23/06/1997	0332-9018246
64	Wajid Khan	Abdul Rahman	Chowkidar		GHS, Tarkha	S.S.C	04/09/1974	25/06/1997	25/06/1997	25/06/1997	0303-5886412
65	Abas Khan	Muhammad Yousaf	N/Q	Mrd	GMS, A.S.C Colony	S.S.C	13/03/1978	23/09/1997	23/09/1997	23/09/1997	0343-9874665
66	Ibrahim Khan	Hameed Khan	Lab: Attend	NSR	GHSS, Khesghi Payan	M.A	03/01/1971	02/05/1998	02/05/1998	02/05/1998	

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OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ELEMENTARY & SECONDARY EDUCATION, NOWSHERA

Tentative Seniority List of Class-IV OF Ele: & Secy: Education, Nowshera

S#	Name of Class-IV	Father's Name	Designation	Domicil	Name of School	Qualificatio	Date of Birth	Date of 1st Apprt: in Edu: Distt.	Date of taking over charge	Date of taking over charge in this Distt.	Mobile #
67	Muhammad Asif	Ghulam Muhammad	Lab. Attend	NSR	GHSS, Khesghi Payan	F.A	08/05/1973	02/05/1998	02/05/1998	02/05/1998	
68	Khan Muhammad	Mian Khan	Chowkidar	NSR	GHS, Adanizai	S.S.C	09/11/1967	01/10/1998	01/10/1998	01/10/1998	0321-9898011
69	Bahar Ali	Gohar Ali	Chowkidar	NSR	GPS, Rashakai	S.S.C	03/04/1979	16/10/1998	17/10/1998	17/10/1998	
70	Abid Muhammad	Fazal Muhammad	N/Q	NSR	GHSS, Khesghi Payan	F.A	02/03/1972	28/10/1998	28/10/1998	28/10/1998	
71	Hamid Ali	Janas Khan	Mali	NSR	GHS, Rashakai	S.S.C	15/11/1979	08/12/1998	08/12/1998	08/12/1998	0300-5714732
72	Ashraf Ali	Khidmat Ali	Khakrob	NSR	GHS, L.C Aman Garh	S.S.C	01/03/1969	17/12/1998	17/12/1998	17/12/1998	0345-9307385
73	Anwar Khan	Muh. Ilyas Khan	Chowkidar	NSR	GHS, Dag Behsud	S.S.C	03/03/1970	26/12/1998	26/12/1998	26/12/1998	0315-9706477
74	Muhammad Ayaz	Muhammad Sharif	Lab: Attend	NSR	GHSS, Khesghi Payan	M.A	31/03/1971	31/12/1998	31/12/1998	31/12/1998	
75	Shoukat Ali	Gul Rehman	Lab: Attend	NSR	GHS, Samandar Ghari	F.Sc.	30/12/1972	14/01/1999	14/01/1999	14/01/1999	0333-9003731
76	Faqir Taj	Mahabat Khan	Lab: Attend	NSR	GMS, Misri Banda	F.A	25/07/1973	01/02/1999	01/02/1999	01/02/1999	0333-9023188
77	Sher Dil Khan	Ashraf Khan	Lab: Attend	NSR	GHSS, Khairabad	S.S.C	03/10/1971	19/02/1999	19/02/1999	19/02/1999	0333-9325977
78	Fazli Rabi	Noor Zada	Lab: Attend	NSR	GHSS, Khairabad	S.S.C	15/07/1973	19/02/1999	19/02/1999	19/02/1999	0333-9039912
79	Zulficar	Imran Gul	N/Q	NSR	GHSS, Khairabad	S.S.C	22/12/1974	19/02/1999	19/02/1999	19/02/1999	0333-9012979
80	Shah Nawaz	Shah Zaman	Lab: Attend	NSR	GHSS, Khairabad	M.A	10/11/1977	19/02/1999	19/02/1999	19/02/1999	0333-9040109
81	Rabi Ullah	Zaman Khan	Sweepor	NSR	GMS, Aza Khel Bala	S.S.C	08/01/1972	01/03/1999	01/03/1999	01/03/1999	0346-5670879
82	Muhammad Jehanzeb	Khwaja Ihtaf Hussain	Lab: Attend	NSR	GHSS, Manki Sharif	F.A	11/09/1967	11/03/1999	11/03/1999	11/03/1999	0333-9188357
83	Zahoor Hussain	Mir Hassan	N/Q	NSR	GHS, Mohib Banda	S.S.C	02/01/1961	17/04/1999	17/04/1999	17/04/1999	0334-9113431
84	Muhammad Zafar	Muhammad Nisar	Lab: Attend	NSR	GHS, Baghan Pura	S.S.C	10/04/1974	23/04/1999	23/04/1999	23/04/1999	0333-9027484
85	Ismail Shahid	Israr ud din	Chowkidar	NSR	GPS, No:2 Bara Banda	B.A	02/05/1979	30/12/1999	30/12/1999	30/12/1999	
86	Akbar Hayat	Hidayat Ullah	Chowkidar	NSR	GPS, No: 1 Risal Pur	S.S.C	03/04/1976	31/12/1999	31/12/1999	31/12/1999	
87	Ikrām ud Din	Rahman ud Din	Khakroob	NSR	GHS, No.1 Shaidu	B.A / JDPE	12/12/1978	08/01/2000	08/01/2000	08/01/2000	
88	Noor Zada	Sahib Zada	N/Q	NSR	GHS, No.1 Shaidu	S.S.C	23/09/1977	30/06/2000	30/06/2000	30/06/2000	
89	Hārōon ur Rasheed	Nisar Ahmad	Lab: Attend	NSR	GHSS, Manki Sharif	S.S.C	24/04/1970	01/07/2000	01/07/2000	01/07/2000	0332-4544325
90	Qasim shah	Sharif ud din	Chowkidar	NSR	GPS, No2 Mulla Killi	F.A	13/04/1983	05/03/2001	05/03/2001	05/03/2001	
91	Asad ali	Noor Muhammad	Chowkidar	NSR	GPS, Suhbat Korrana	S.S.C	02/05/1983	25/04/2001	25/04/2001	25/04/2001	
92	Zia ur Rahman	Gul Mast	Chowkidar	NSR	GHS, Rashakai	S.S.C	24/05/1983	31/05/2001	31/05/2001	31/05/2001	0300-5775859
93	Naveed Khan	Liaqat Ali	Behishti	NSR	GHS, Banda Sheikh Ismail	S.S.C	25/03/1983	01/12/2002	01/12/2002	01/12/2002	0302-2383815
94	Shabir Ahmad	Sharif ud din	Chowkidar	NSR	GPS, No2 Mulla Killi	B.A	15/03/1988	23/09/2003	23/09/2003	23/09/2003	
95	Abdul Khaliq	Abdul Malik	Behishti	Chard	GHS, Aman Garh	S.S.C	24/03/1959	07/01/2004	07/01/2004	07/01/2004	0315-9594713
96	Zafar Ali Khan	Guldar Khan	Chowkidar	NSR	GHS, Mughalkai	S.S.C	01/04/1980	01/03/2004	01/03/2004	01/03/2004	0334-9434569
97	Ihsanul Haq	Irfaul Haq	Behishti	NSR	GHS, No:1 Nowshera Cantt.	M.A	15/04/1986	30/04/2004	30/04/2004	30/04/2004	0313-5770919
98	Gul Zada	Khan Zada	Chowkidar	NSR	GPS, Khaisri	S.S.C	01/03/1982	11/11/2004	22/11/2004	22/11/2004	
99	Akbar Hussain	Fazal Akbar	Chowkidar	NSR	GPS Pushtoon Ghari	S.S.C	02/02/1977	22/11/2004	23/11/2004	23/11/2004	0336-8664830

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محمد رازدول محمد

22



OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ELEMENTARY & SECONDARY EDUCATION, NOWSHERA  
Tentative Seniority List of Class-IV OF Ele: & Secy: Education, Nowshera

S #	Name of Class-IV	Father's Name	Designation	Service	Name of School	Qualification	Date of Birth	Date of 1st Apptt: in Edu: Deptt:	Date of taking over charge	Date of taking over charge in this Distr:	Mobile #
166	Kaleem Ullah	Siraj Muhammad	Sweeper	NSR	GCMHS, Akora Khattak	S.S.C	13/07/1991	04/06/2010	04/06/2010	04/06/2010	31298462
167	Zubair	Shah Muhammad	Chowkidar	NSR	GPS, Suhbat Korrana	SSC	18/01/1980	22/06/2010	24/06/2010	24/06/2010	344451153
168	Imran ud Din	Fayaz ud Din	Sweeper	NSR	GHSS, Z.K.Ksahib	F.A	15/02/1990	24/06/2010	24/06/2010	24/06/2010	346957137
169	Sabzar Khan	Sardar Muhammad	Chowkidar	NSR	GPS, Ouch Khwar	S.S.C	05/03/1979	25/06/2010	25/06/2010	25/06/2010	
170	Iftikhar Khan	Jabbar Khan	Chowkidar	NSR	GPS, Issori Payan	B.A	12/02/1981	25/06/2010	25/06/2010	25/06/2010	301876857
171	Shabir Ahmad	Abdul Nawaz	Chowkidar	NSR	GPS, Hassan Dara	S.S.C	05/05/1974	29/06/2010	29/06/2010	29/06/2010	
172	Syed Tayyeb Ali shah	Syed Haleem Shah	Chowkidar	NSR	GPS, Spino Killi	B.A	28/01/1993	30/09/2009	30/09/2009	10/07/2010	346567024
173	Raza Khan	Said Nazeer	Chowkidar		GPS, No2 Shaidu	F.Sc	05/07/1986	26/02/2010	26/02/2010	03/08/2010	307807483
174	Sufaid Khan	Muhammad Zaman	Lab: Attend		GHS, Tarkha	B.A	03/08/1985	01/01/2011	01/01/2011	28/02/2011	343954865
175	Arshad Aman	Bhai Khan	Sweeper	NSR	GHS, Watter	S.S.C	10/01/1985	28/02/2011	28/02/2011	10/01/2012	
176	Hidayat Shah	Bahader Shah	Chowkidar	NSR	GPS Dag Behsud No5	SSC	20/08/1988	10/01/2012	10/01/2012	10/01/2012	333904986
177	Nasir Khan	Noor Muhammad	Chowkidar	NSR	GPS, 3 Ali Baig	SSC	01/12/1985	17/01/2012	18/01/2012	18/01/2012	313923633
178	Arshid Khan	<del>Kamat Khan</del>	Chowkidar	NSR	GPS Lakari	SSC	08/01/1978	19/01/2012	19/01/2012	19/01/2012	
179	Zubair Khan		Lab: Attend		GHS, Khaisari	S.S.C		19/01/2012	19/01/2012	19/01/2012	
180	Rooh-Ullah	Mir Zaman		NSR	GMS, Kandi Taza Din	S.S.C	01/09/1979	26/01/2012	26/01/2012	26/01/2012	333919289
181	Khailid Dawood	Dawood Khan	Lab: Attend		GHS, No2 Shaidu	F.Sc	19/08/1988	30/01/2012	30/01/2012	30/01/2012	313935639
182	Khaer ul Bashar	Dilawar Khan	Sweeper	NSR	GMS, Aman Garh	D.A.E	19/09/1990	31/01/2012	31/01/2012	31/01/2012	332934342
183	Mustafa	Asalm Khan	Behishti	NSR	GHS, No.1 Shaidu	SSC	23/04/1972	08/02/2012	08/02/2012	08/02/2012	92364012
184	Khan Niaz	Haroon Khan	Chowkidar	NSR	GHS, Khesghi Bala	S.S.C	05/10/1976	09/02/2012	09/02/2012	09/02/2012	
185	Ijaz Ahmad	Nazir Muhammad	Chowkidar	NSR	GPS Kabul River	FA	01/12/1978	02/01/2012	18/02/2012	18/02/2012	321952646
186	Mubarak Ali	Allah Bakhsh	Sweeper	NSR	GPS, No.1 Nowshera Cantt:	S.S.C	09/02/1967	01/03/2012	01/03/2012	01/03/2012	300571053
187	Mukarram Khan	Muh. Akram Khan	N/Q		GHS, No.1 Nowshera Cantt:	B.A	20/09/1973	02/07/2012	02/07/2012	02/07/2012	301562500
188	Ahmad Ali	Muhammad Tahir	Behishti	NSR	GHS, No.1 NSR Kalan	S.S.C	15/04/1988	07/08/2012	07/08/2012	07/08/2012	

District Education  
Officer (M) Nowshera

P. I ~~2/8~~ 27

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

Execution Petition No. 43/2018

C.O.C No. \_\_\_\_\_/2018

In

Appeal No. 304/2014

Khyber Pakhtunkhwa  
Service Tribunal

158

08/02/2018

Mr. Abdur Rahim, Class-IV, Government Higher Secondary School, Khweshgi Payan, Tehsil and District Nowshera.....(Petitioner)

**VERSUS**

1. Mr. Rafiq Khattak, Director Education, Elementary and Sedentary Education Khyber Pakhtunkhwa, Peshawar.
2. Mr. Fayaz Hussain, District Education Officer, Nowshera.....(Respondents)

**APPLICATION FOR INITIATING CONTEMPT**  
**OF COURT PROCEEDING AGAINST THE**  
**RESPONDENTS WHO REFUSED TO**  
**IMPLEMENT THE ORDER DATED**  
**27/10/2017 ON APPEAL NO. 304/2014 OF**  
**THIS HON'BLE TRIBUNAL, WITHOUT**  
**PREPARING PROMOTION LIST STAGE**  
**WISE AND CALCULATION ON 33% QUOTA**  
**OF CLASS-IV SINCE FIRST STAGE OF**  
**SERVICE.**

Certified to be true copy  
ELDER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Annex I

P-28-28

20.11.2019

Junior to counsel for the appellant and Addl. AG alongwith Inayatullah, ADO for the respondents present.

A request for adjournment is made on account of non-availability of learned senior counsel for the appellant. Adjourned to 30.12.2019 for further proceedings in view of order dated 25.09.2019.

Chairman 

30.12.2019

Counsel for the petitioner present. Nemo for respondents.

Learned counsel states that after passing of judgment under implementation recently another seniority list has been issued by the respondents wherein juniors to the petitioner have been allocated positions senior to him. The petitioner, therefore, desires to pursue legal remedy available to him on account of the seniority list and requests for consigning the instant proceedings to the record with the reservation of his right as stated above.

Instant execution proceedings are consigned to record. The petitioner shall, however, be at liberty proceed against the seniority list or any other instruments, whereby, his service rights have been adversely affected, in accordance with law.

Chairman 

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Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

۱-۲۹

## خدمت جناب ڈسٹرک ایجوکیشن آفیسر مردانہ نوشہرہ

درخواست بمزاد کلاس نور پر موشن جوئیر کلرک ۳۳ فیصد کوٹہ

جناب عالی

موردبانہ گزارش ہے کہ فدوی گزشتہ 27 سال سے محکمہ تعلیم میں بطور کلاس نور ڈیوٹی سرانجام دے رہا ہے۔ اور ابھی تک ہمارا کوئی ترقی نہیں ہوئی ہے۔ اور ہم سے جوئیر کوٹہ 33 فیصد کوٹہ میں بطور جوئیر کلرک ترقی دی گئی ہے۔ ان کلاس نور کے کوائف درج ذیل ہیں

نام	ولدیت	تاریخ ملازمت
1- محمد آیاز LIA	محمد شریف	29-12-1998
2- حامد علی مالی	جانس خان	28-07-1998
3- انعام اللہ دفتری	عنایت اللہ	یہ سنڈیٹی میں موجود نہیں ہے

لہذا میں بھی اس سلسلے میں درخواست گزار ہوں کہ ہمیں بھی 33 فیصد کوٹہ میں بطور جوئیر کلرک میں ترقی دیکر مشکور فرمائیں۔  
فدوی کی تعلیمی قابلیت درج ذیل ہے۔

- 1- بی۔ اے پی ٹی سی
- 2- کمپیوٹر سٹیفیکٹ
- 3- ٹائپنگ سٹیفیکٹ

ہمیں امید ہے کہ آپ صاحبان ہمارے اس درخواست پر ہمدردانہ غور فرما کر شکرگزاری کا موقع دے۔  
No: 799 Dated: 27-09-2019

ساری عمر دعا گو رہوں گا۔

27-09-2019 مورخہ  
Recommended and Forwarded  
to the D.E.O (M) NSK  
for n/a please... عرض گزار

آپ کا تابع فرمان عبدالرحیم ولد رضا خان نائب قاصد

گورنمنٹ ہائیر سکول خویبشگی پایان نوشہرہ 27-09-2019

Attested  
SA

(BETTER COPY)

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) NOWSHERA

APPOINTMENT:

Appointment of the following persons to hereby ordered appointment the post of Lab: Attdt: on temporary basis in BPS No.01 (Ro1245-35-1770) p.m pulse usual allowance as as admissible under the rules with effect from the date of taking over charge against vacant post on the terms and condition noted below :-

<u>S.NO</u>	<u>NAME &amp; ADDRESS</u>	<u>POSTED AT</u>	<u>REMARKS</u>
1.	Mr. Muhammad Ayaz S/O Muhammad Sharif Vill: Moh Lali Khel Kheshgi Bala NSR :	GHSS Kheshgi Payan Nowshera	Against Vacant Leb:Attd: post

Terms and conditions./

1. The appointment is purely temporary and liable to termination at any time without assigning any reason or notice
2. In case of resignation they will have to submit one month from the government
3. They are required to produce health and age certificate from the medical authorities concerned before taking over charge in case they are not government servant.
4. They are not allowed to take over charge if there age less then 18 years and above 45\_ year.
5. All original educational character and detail certificate must be verified by the head of the institution concerned before handing over charge.
6. If they fail to take over charge of the post within 7 days from the issued of this order the appointment will be automatically consider as cancelled.
7. Charge reports should be submitted to all concerned.
8. No TA & DA etc: is allowed.

(MUHAMMAD SALEEM)  
DISTRICT EDUCATION OFFICE,  
(M&F) SECONDARY NOESHER

ENDST: No. 6340-43 /F. No, \_\_\_\_\_ / APPTT: Dated NSR the 29 / 12 / 1998

Copy forwarded to the ;

1. District Accounts officer Nowshera.
2. P.A to director secy:Edu(S)NWFP Peshawar
3. Candidate concerned
4. A .D . E . O (Accounts) Local office

DISTRICT EDUCATION OFFICER  
(M&F) SECONDARY NOWSHER

K  
P-28 30

OFFICE OF THE DISTRICT EDUCATION OFFICER (MSP) SECONDARY NOWSHERA.

APPOINTMENT:

Appointment of the following persons is hereby ordered against the post of Lab: Attst: on temporary basis in EPS No. 01 (Rs. 1245-35-1770) plus usual allowances as admissible under the rules with effect from the date of taking over charge against the vacant post on the terms & Conditions noted below:-

S. NO.	NAME AND ADDRESS:	POSTED AT:	REMARKS.
1.	Mohammad Ayaz S/o Mohammad Sharif, Lab: Tali Khal, Kheshgi Bata NSR.	GHS Kheshgi, Payan Nowshera.	Against post Lab: Att: Post.

TERMS AND CONDITIONS:

1. The appointment is purely temporary and liable to termination at any time without assigning any reason or notice.
2. In case of resignation they will have to submit one month prior notice to the Deptt: forfeit one month Pay from the Govt: servant.
3. They are required to produce Health and age certificate from the Medical authorities concerned before taking over charge in case they are not Govt: servant.
4. They are not allowed to take over charge if their age is less than 18 Years and above 45 Years.
5. All original Educational character and Detail Marks certificate must be verified from the Head: of institutions concerned before taking over charge.
6. If they fail to take over charge of the post within One month from the issued of this order the appointment will be automatically consider as cancelled.
7. Charge report should be submitted to all concerned.
8. No. TA/DA etc: is allowed.

( MUHAMMAD GALIBI )  
DISTRICT EDUCATION OFFICER  
(MSP) SECONDARY NOWSHERA.

Encl: No. 6340-43 P. No. Class-IV Dtt: 28/12 1998.

- Copy forwarded to the:-
1. District Accounts Officer Nowshera.
  2. P. to Director Secy: Edu (S) NWFP, Peshawar.
  3. Candidate concerned.
  4. A. P. O. Local Station.

ASHI/...  
M. Iqbal Hashmi  
P. O. /

Principal  
GHS Kheshgi Payan  
(Nowshera)

MUSHTAQ GABRIEL  
DISTRICT EDUCATION OFFICER  
(MSP) SECONDARY NOWSHERA.

Attested  
SA

10

OFFICE OF THE  
DISTRICT EDUCATION OFFICER (MALE)  
NOWSHERA

NOTIFICATION

In compliance with the judgment /order issued on 22.3.2013 by the Khyber Pakhtunkhwa Service Tribunal Peshawar vide civil appeal no. 320, 321 and 322/2012 titled Inamullah and others Class IV Versus Elementary and Secondary Education Department, the following Class-IV employees of Elementary and Secondary Education Department District Nowshera are hereby promoted to the post of Junior Clerk BPS-7(5800-320-15400) plus usual allowances under the rules on regular basis under existing policy of the Provincial Government under 33% quota and posted at the schools noted against their name with immediate effect.

Name & Designation	Father name	name of school Office
Inamullah Daftari	Inayatullah	DEO NSR
Muhammad Ayaz lab Attend	Muhammad Sharif	GHSS Kheshgi Payan
Junaid Ali Mali	Janas Khan	GHS Rashakai

TERMS AND CONDINTIONS

- 1- They would be probation for a period of one year extendable for another one year.
- 2- They should join their post within fifteen days of the issuance of this notification.
- 3- They will be governed by such rule and regulations as may be issued time to time by the government.
- 4- Charge report should be submitted to all concerned.
- 5- DDO concerned will verify their documents before release of pay. If documents were found bogus they will be terminated.
- 6- Necessary entry to this effect should be made in their Service Books accordingly.
- 7- An undertaking from the official concerned be taken stating wherein that if the said promotion was withdrawn due to the representation/appeal or by the court, recovery of the monitory benefits taken during the said period will be deducted/recovered as arrear of land revenue from the official concerned.
- 8- No T/D.A is allowed for joining their duty.
- 9- They will given an under taking to be recorded in their Service Book to the effect that if any over payment is made to him in the light of this order will be recovered and if he is wrongly promoted will be recovered.

District Education Officer (Male)  
Nowshera.

P. K ~~29~~ (31)  
OFFICE OF THE  
DISTRICT EDUCATION OFFICER (MALE)  
NOWSHERA

(Office Phone#0923-9220228, Fax#0923-9220228)

**NOTIFICATION**

In compliance with the judgment / order issued on 22-03-2013 by the Khyber Pakhtunkhwa Service Tribunal Peshawar vide civil appeal No. 320, 321 & 322/2012 titled Inam Ullah and other Class-IVs versus Elementary & Secondary Education Department, the following Class-IV employees of Elementary & Secondary Education Department District Nowshera are hereby promoted to the post of Junior Clerk BPS-07 (5800-320-15400) plus usual allowances under the rules on regular basis under the existing policy of the Provincial Government, under 33% quota and posted at the schools noted against their names with immediate effect subject to the terms and conditions noted below: -

S #	Name & Designation	Father's Name	Name of School / Office	Promoted & Posted at
01	Inam Ullah Daflari	Inayat Ullah	DEO (M) NSR	Junior Clerk at GHS, Ali Bang
02	Muhammad Ayaz Lab: Attend	Muhammad Sharif	GHSS, Kheshgi Payan	Junior Clerk at GHS, Labor Colony, Aman Garh
03	Hamid Ali Mali	Janas Khan	GHS, Rashakai	Junior Clerk at GHS, Kotar Pan

**TERMS & CONDITIONS:**

1. They would be on probation for a period of one year extendable for another one year.
2. They should join their post within fifteen days of the issuance of this Notification.
3. They will be governed by such rules and regulations as may be issued time to time by the Government.
4. Charge report should be submitted to all concerned.
5. If the DDO concerned will verify their documents before release of pay, if documents were found bogus they will be terminated.
6. Necessary entries to this effect should be made in their Service Books accordingly.
7. An undertaking from the officials concerned be taken stating wherein that, if the said promotion was withdrawn due to the representation / appeal or by the court, recovery of the monetary benefit taken during the said period will be deducted / recovered as arrear of land revenue from the officials concerned.
8. No TA / DA is allowed for joining their duty.
9. They will given an under taking to be recorded in their Service Books to the effect that if any over payment is made to him in the light of this order will be recovered and if he is wrongly promoted he will be reversed

(Muhammad Saeed)  
District Education Officer (Male)  
Nowshera

Ends: No. 2628 - 37/DEO(M)NSR/EA-S/Prom: of Class-IV/2013.

Dated Nowshera the 03 / 06 / 2013

Copy of the above is forwarded for information and necessary action to the: -

- 1: Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
- 2: PS to Secretary, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 3: Director, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 4: Section Officer (Lit: II), Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 5: Deputy Solicitor, Law Department, Khyber Pakhtunkhwa, Peshawar.
- 6: Senior District Accounts Officer, Nowshera.
- 7: Principal / Head Master concerned.
- 8: Assistant District Education Officer, Estt: Secondary Branch, Local Office.
- 9: Superintendent / Dealing Assistant, Estt: Secondary Branch, Local Office.
- 10: Official concerned.

Deputy District Education Officer  
(Male), Nowshera

Attested  
S.A.

29/12/12  
1998  
= 8-12  
1998  
SN: 71  
Old S. 12



Bro: L  
D-321

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR



Appeal No. 320/2010

Date of Institution. ... 08.3.2012  
Date of Decision. ... 22.3.2013

Mr. Inamullah S/O Inayatullah, Daftari, Office of the EDO(E&SE)  
Nowshera. ...

(Appellant)

VERSUS

1. The District Coordination Officer, Nowshera.
2. The EDO(E&SE) Nowshera.
3. The Secretary, Finance Department Government of Khyber Pakhtunkhwa, Peshawar. ...

(Respondents)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 FOR DIRECTING THE RESPONDENTS TO CONSIDER THE APPELLANT FOR PROMOTION TO THE POST OF JUNIOR CLERK UNDER 33% QUOTA FIXED BY THE GOVERNMENT AND AGAINST NOT TAKEN ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF NINETY DAYS.

MR. MUHAMMAD ASIF YOUSAFZAI,  
Advocate ...

For appellant.

MR. ARSHAD ALAM,  
Government Pleader ...

For respondents.

MR. SULTAN MAHMOOD KHATTAK,  
MR. FAREEDULLAH KHAN, ...

MEMBER  
MEMBER.

**ATTESTED**  
**EXAMINER**  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

JUDGMENT

SULTAN MAHMOOD KHATTAK, MEMBER.- This appeal has been filed by Inamullah, the appellant under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 with the prayer that on acceptance of the appeal, the respondents be directed to consider him for promotion to the post of Junior Clerk under 33% quota reserved by the government from due date/availability of the vacancy with all consequential benefits. .

2. Brief facts of the case as averred in the memo: of appeal are that the appellant joined the respondent department as Daftari on 2.10.1993. He has more than 18 years service at his credit having passed SSC and F.A examinations. The Government of Khyber Pakhtunkhwa had fixed 33% quota for promotion of Class-IV as Junior Clerks with SSC qualification, but the appellant was never considered for promotion, to the post of Junior Clerk. Feeling aggrieved, he filed departmental appeal on 18.11.2012, which elicited no response within the statutory period of ninety days, hence the present appeal.




3. The appeal was admitted to regular hearing on 22.3.2013 and notices were issued to the respondents. The respondents have filed their joint written reply and contested the appeal. Rejoinder was also filed in rebuttal.
4. Arguments heard and record perused.
5. The learned counsel for the appellant argued that the appellant was appointed as Daftari on 2.10.1993 having the qualification of SSC. He further acquired F.A qualification during service. He further argued that there are sufficient vacancies of Junior Clerk lying vacant in the department and was more deserved to be considered for promotion from the date of availability of vacancies having more than 20 years service at his credit and highly qualified under 33% quota reserved by the government. The learned counsel for the appellant produced a copy of judgment dated 11.1.2012 in Service Appeal No. 104/2011, titled "Zahoor Jan Versus the DCO, Nowshera etc.", wherein the respondent department was directed to consider, the appellant in that appeal alongwith others against the post lying vacant under 33% promotion quota from the date when the vacancies was available. The present appellant is also entitled to the same treatment. He requested that the appeal may be accepted as prayed for.
6. The learned AGP argued that the appellant will be considered for promotion in his own turn under 33% quota in accordance with existing rules/policy and seniority-cum-fitness basis.
7. The Tribunal while agreeing with the arguments put forth by the learned counsel for the appellant accepts the appeal and directs the respondent department to consider the appellant alongwith others for promotion against the post of Junior Clerk from the date when vacancies were available for them within ninety days with all consequential benefits from that date. Parties are left to bear their own costs. File be consigned to the record.
8. This judgment will also dispose of Service Appeals No. 321/2012 titled Muhammad Ayaz, and No. 322/2012, titled Hamid Ali versus the DCO, Nowshera and others, having similar question of law, in the same manner.

ANNOUNCED  
22.3.2013.

Certified to be true

(FAREED ULLAH KHAN) MEMBER  
 (SULTAN MAHMOOD KHATTAK) MEMBER

Secretary  
 Service Tribunal  
 Pesbawar

50 روپے	37509	  
ایڈویکٹ: گوہر علی عورتی اور وکیل	بار کونسل ایسوسی ایشن نمبر: 10.7448	
رابطہ نمبر: 08459082942	پشاور بار ایسوسی ایشن، خیبر پختونخوا	

بعدالت جناب: سر ایس ڈی سید منیر کھٹون جوائے لہ آباد

منجانب: اسد نواز	دعویٰ:
محمد الرحیم	علت نمبر:
بنام	مورخہ:
کوسا ای اور ایجوکیشن سوسائٹی	جرم:
	تھانہ:

**بابت تحریر آنگہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ  
آن مقام کے لیے گوہر علی عورتی اور وکیل کو وکیل مقرر  
کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال 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  
زرائع پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی، نیز  
دائرہ گرانے 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 با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا  
دوران مقدمہ میں جو خرچہ ہر جانب 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  
المرقوم: 15 صوری 2020

Attest & accepted

**BEFORE THE KHYBER PAKHTUN KHWA SERVICE  
TRIBUNAL PESHAWAR.**

**Service appeal NO. 761/2020**

**Mr. Abdur Rahim VS Edu.**

**PARAWISE COMMENTS ON BEHALF OF  
RESPONDENT NO 1 & 2.**

**RESPECTFULLY SHEWETH,**

Respondent submits as under.

**Preliminary objections:**

- 1) That the appellant has no cause of action/locus standi to file the instant service appeal.
- 2) That the present appeal is bad for non-joinder and miss-joinder of necessary parties.
- 3) That the appellant is estopped by his own conduct, by deed and by law to file the instant appeal.
- 4) That the instant appeal is not maintainable in its present form.
- 5) The present appeal is badly time barred.

## ON FACTS:

- 1) Pertains to record, with the explanation that the appellant has got pre-mature retirement from service on 30-9-2020 and also submitted an undertaking that the appellant will not claim any back benefits thereafter. (Copy of retirement order & undertaking is annexed as annexure 'A' & 'B').
- 2) Para -02 pertains to record subject to proof.
- 3) Para -03 is incorrect, 33% quota fixed by the govt. of KPK for promotion to clerk from C-IV is conditioned with the seniority cum fitness, while the appellant is low at seniority and shall be promoted on his due turn. While the promoted C-IV objected by the appellant were duly promoted by the honorable tribunal judgment in appeal NO.321/2012 & 322/2012 copies of which are already attached by the appellant. (Copy of *Tentative* seniority list is attached as annexure 'C').
- 4) Para-04 is incorrect, making no sense, however it is added that the appellant had already filed an appeal no. 304/2014 asking the same relief in which final order was issued by this honorable tribunal on 27/10/2017 in which it was decided that respondent should calculate the quota of promotees in accordance with the prevalent rules at different stages & then they should consider all those who are eligible & fit for promotion at different stages. Then in 2018 the appellant filed an E.P no 42/2018 in appeal no 304/2014 for

implementation in which the respondents submit an implementation report according to which the petitioner was not fulfilling the criteria of seniority cum fitness (Copies of Service Tribunal Order, E.P, & implementation report are annexed as annexure 'D, E' & 'F').

5) Para-05 is incorrect, no such appeal has been filed on 27-9-2019

**ON GROUNDS:**

A)Ground -A is incorrect, the appellant is low in merit and already retired now.

B)Ground -B is incorrect, the appellant is low in the seniority list.

C)Ground -C is incorrect, Respondent No. 4, 5&6 were duly promoted in compliance of the Honorable Tribunal judgment, copies of which are attached by the appellant.

D)Ground -D is incorrect, as explained above.

E)Ground -E is incorrect, every case has its own facts, and the appellant is clearly low in seniority list.

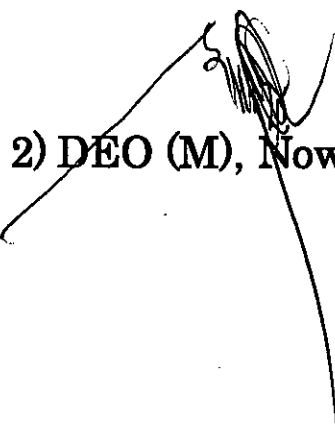
F)Ground -F is incorrect, the appellant is low in seniority list.

G)Respondents may also be permitted to raise other grounds in arguments.

It is therefore most humbly prayed that the instant appeal being meritless, vexatious, and erroneous may kindly be dismissed.

RESPONDANTS;

  
1) Director E&SE, KPK

  
2) DEO (M), Nowshera



OFFICE OF THE DISTRICT EDUCATION  
OFFICER (MALE) NOWSHERA

(Office Phone#0923-9220228, Fax#0923-9220228)

**RETIREMENT ORDER.**

Without prejudice to the legal remedies available to Provincial Government and in pursuance of Judgment of the Peshawar High Court Peshawar Dated: 19/02/2020 in WP No. 5673-P/2019 and Under the provision of Government of Khyber Pakhtunkhwa Finance Department letter No.FD (SR-VI) Vol.II dated: 24-08-1983, Sanction is hereby accorded to the grant of leave encashment /Retirement from Govt: Service on 30-09-2020 on Pre Mature Retirement Detail given below.

S	Name of Officials & School	Date of Retirement	Date of Birth	Date of Ist Apptt:	Encasement of LPR	Total Service Y- M-D	Remarks
1	Mr. Abdur Raheem Sweeper GHSS Khashgi Payan (NSR) P.No;00138464	30-09-2020	09-10-1975	20-10-1992	365 days on full pay	27-11-10	Pre Mature Retirement

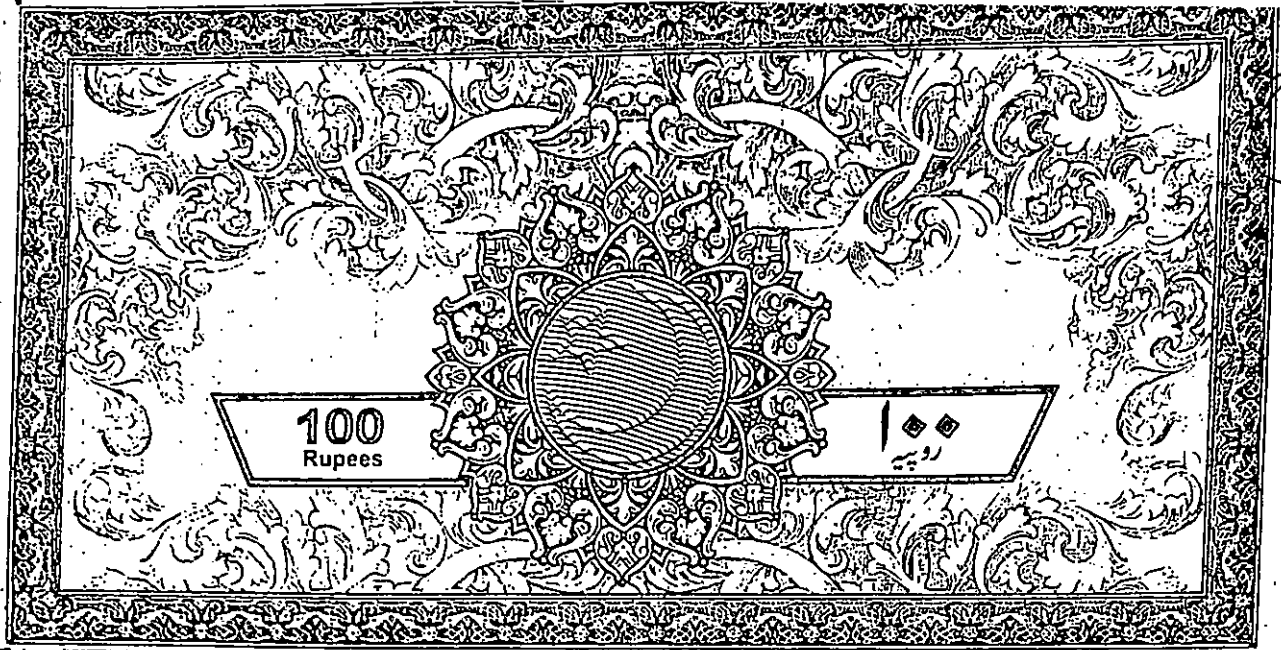
(Sajjad Akhter Iqbal)  
DISTRICT EDUCATION OFFICER (MALE)  
NOWSHERA

Endstt: No 4956-60 /DEO (M) NSR/EA-S/Retirement of SCT (NSR) the dated 24/09/2020  
Copy forwarded for information to the:-

1. Senior District Accounts Officer Nowshera.
2. Principal/Head Master Concerned.
3. EMIS Local Office.
4. Official concerned.
5. Office Copy.

DISTRICT EDUCATION OFFICER (MALE)  
NOWSHERA





(Undertaking on Judicial Stamp Paper duly attested by the Oath Commissioner)

## UNDERTAKING

✓  
I Mr./Ms. Abdur Reheem s/o Raza Ichan

CNIC No. LT2001-7118923-7 resident of Wll: Fazal Abad NDA Chorsabli.

from Government service on 19-10-1992 as 30-09-2020

F.H.S. Lashari Pagan. O.S.R.

do hereby solemnly affirm and declare that I shall not claim any back benefit on account of  
accrued during the course of retirement to the date of decision of the apex court.



**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) NOWSHERA**  
**TENTATIVE SENIORITY LIST CLASS IV IN DISTRICT NOWSHERA**

S.No	Name of School	Name of Class-IV	Father Name	Designation	District	BPS	Qualification	Date of Birth	Date of Appointment	Date of taking over charge	Personal No.	CNIC No.	Cell No.
1	GHS Pn Poi	Nasir ul Haq	Israr Gul	Lab Attent	NSR	4		01/06/1960	01/12/1978	01/12/1978	16		18
2	GHS Inzari	Ghuncha Gul	Nawab Gul	Mali	NSR	4	6th	04/11/1962	20/11/1980	20/11/1980	134951	17201-2169556-9	NE
3	GHS Pn Subaq		Israr ul Din	Chowkidar	NSR	4	nil	01/07/1961	19/02/1981	19/02/1981	135228	17201-2210098-1	0313-9703177
4	GSMHSHS Taru Jabba NSR	Wakeel Khan	Rasool Khan	Lab att.	NSR	4	NIL	12/12/1962	02/04/1981		133716	17201-5914131-9	0302-5955962
5	GHS Monki Sharif	Humayun Khan	Abdul Ghafar	Lab. Attent	NSR	4		05/12/1963	01/02/1982	01/02/1982	135154	17201-1342472-3	0334-8942264
6	GHS Multa Killi	Forman Ali	Abdur Rehman	Naib Qasid	NSR	5		16/11/1963	16/11/1982	17/11/1982	135239	17201-2139429-1	0344-9991919
7	GHS Samandar Ghori	Ikhtalaq Ul Amin	Raohullah	Sweeper	NSR	3	MIDDLE	10/03/1983	08/03/1983	08/03/1983	997108	17201-2284409-1	0344-9812452
8	GPS Multa Killi No 2	Qasim Shah	Sharif Uddin	Chowkidar	NSR	4	SSC	13/04/1983	13/04/1983	13/04/1983	00346323	17201-7429720-5	0300-5778075
9	GHS Khoisori	Anwar Shah	Mir Ahmad	N/Q	NSR	4		10/05/1966	27/08/1984	27/08/1984	136541	37405-057222-7	NE
10	GHS Marhatti Bando	Lal Zar	Sher Muhammad	Chowkidar	NSR	4		15/10/1965	15/10/1984	15/10/1984	135525		NE
11	GHS Marhatti Bando	Sawab Gul	Hanif Gul	Sweeper	NSR	4		16/12/1964	02/11/1984	02/11/1984	136595	17201-0644949-7	NE
12	GPS PIR PIAI NO.1	Inayat Sharif	Muhammad Shari	Chowkidar	NSR			01/07/1965	09/01/1985	09/08/1985	135535	17201-2268358-3	0334-9228078
13	GHS Spin Khak	Mir Zaman	Muhabbat Khan	Chowkidar	NSR	3		11/02/1966	20/03/1985	20/03/1985	135208	17201-0813859-9	0307-8501516
14	GPS No 1 Pabhi	Mian Zahid Shah	Mian Qabil Shah	Chowkidar	NSR	4		10/01/1962	01/04/1985	01/04/1985	141684	17201-2301517-7	0333-3164001
15	GHS Kotli Sale Khana	Shahi Sultan	Muhammad Azam	Chowkidar	NSR	4		18/01/1964	01/01/1986	01/01/1986	13-3856	17201-2160172-7	0306-5771885
16	GHS Inzari	Qadar Khan	Sher Ghani	Naib Qasid	NSR	5	7th	02/11/1961	30/06/1986	20/07/1986	135524	17201-2144218-7	0346-5667742
17	GHS No.1 Shaidu	Muhammad Mujeeb Ur Re	Abdul Wahab	N/Qasid	NSR	5		01/09/1965	10/08/1986	10/08/1986	708446	17201-6097806-5	0332-9930114
18	GHS Inzari	Gulzada	Khan Sali	Chowkidar	NSR	4		16/09/1965	17/09/1986	17/09/1986	134955	17201-2300748-7	0343-9059848
19	GHS Khawrai	Gul zar Amin	Muhamad Sharif	N.Q	NSR	4	Middle	01/11/1994	01/11/1986	01/11/1986	135901	17201-2225550-5	0336-9145475
20	GSMHSHS Taru Jabba NSR	Nasir Khan	Misal Khan	Sweeper	NSR	4	NIL	15/04/1968	08/11/1986		133718	17201-3181470-3	0343-9421971
21	GHS Behram Killi	Said Anwar	Toati Gul	Naib Qasid	NSR	3		13/12/1965	13/02/1987	13/02/1987	133354	17201-2181889-5	0346-1979990
22	GPS SPIN KHANI KHURD NO 1 (Z.K.K.S)	Fakhrul Bashar	Noor ul basar	Chowkidar	NSR			05/11/1968	04/06/1987	04/07/1987	133354	17201-2181889-5	0346-1979990
23	GPS DURAN	Lal Badshah	Talib Shah	Chowkidar	NSR			07/04/1967	10/06/1987	11/01/1987	857987	17201-2630978-3	0345-3946175
24	GPS ZIARAT KAKA SAHIB NO.2	Rahim Zeb	Muatar Shah	Chowkidar	NSR			01/01/1968	10/06/1987	29-11-1987	1333403	17201-5262371-5	0343-3050812
25	GPS LAL KURTI (NOWSHERA CANTT)	Gul Nawaz	Waris Shah	Chowkidar	NSR			01/10/1968	12/07/1987		133446	17201-768477-3	0314-5441475
26	GHS Samandar Ghori	Muhammad Ali	Jamrooz Khan	Behishti	NSR	4	MIDDLE	01/04/1967	24/09/1987	24/09/1987	134999	17201-3603730-5	0307-5705030
27	GHS Kahi	Abdul Hanan	Amir Khan	Behishti	NSR	4		15/09/1967	26/09/1987	26/09/1987	136528	17201-6930511-5	0307-7144641
28	GPS No1 Jallozai	Naikshad ali	Shishti gul	Chowkidar	NSR	4	primary	04/12/1967	03/10/1987	03/10/1987	133342	17201-2215423-1	Nil
29	GPS Hamza Rashaka No.3	Shaukat Ali	Shams ur Qamar	Chowkidar	NSR	3	NILL	01/01/1966	06/10/1987	06/10/1987	00133319	17201-2148471-4	0303-8211309
30	GPS No 1 Kurvi	Ghafar Ali	Inzar Gul	Chowkidar	NSR	3		01/01/1961	11/10/1987	11/10/1987	133321	17201-2131957-1	Nil
31	GHS Gandary Payan	Shaz Ali Khan	Abdul Hakeem	N/Q	NSR	4		10/06/1968	11/10/1987	18/02/1999	133340	17201-2123497-3	0315-9686403
32	GPS Dawa Karoona	Ibrar Jan	Kheva Din	Chowkidar	NSR	3		15/09/1967	23/10/1987		133313	17201-2320556-3	0306-8323485
33	GPS BAITUL GHARIB	Gul Zamin	Samin Khan	Chowkidar	NSR			14/01/1964	27/10/1987	11/01/1987	133359	17201-2115898-0	0300-
34	GPS Dheri Mian Ishaq	Jafar Khan	Fazal Ghani	Chowkidar	NSR	4		01/11/1966	27/10/1987	27/10/1987	133164	17201-2178810-5	0308-8046720
35	GPS Cherat	Akbar zaman	Sahib zamcc	Chowkidar	NSR	3		07/01/1966	28/10/1987	28/10/1987	133299	17201-2169118-9	3075965676
36	GPS Kandi Taza Din	Hayat Khan	Gulshan Khan	Chowkidar	NSR	3		01/01/1966	28/10/1987	28/10/1987	133322	17201-0591384-9	0302-8801337
37	GHS Nizam Pur	Khalid Khan	Hassan Khan	Naib Qasid	NSR	4	SSC	01/01/1968	28/10/1987	28/10/1987			3005881274
38	GPS KANA KHEL	Mukhtiyar	Nowshad Khan	Chowkidar	NSR			08/08/1968	29-10-1987	11/01/1987	133362	17201-9999085-7	0333-9038005
39	GPS KALLI KANDOW	Noor Said	Gul Said	Chowkidar	NSR			21/09/1966	29-10-1987	31-10-1987	133369	17201-2164603-7	0346-6273456
40	GPS NO 1 WALAI	Shah Room	Noor Said Shah	Chowkidar	NSR			27/07/1968	29-10-1987	01/11/1987	857681	17201-1780138-9	0333-9004234
41	GPS No1 Shah kot payan	Ajmal khan	Libas khan	Chowkidar	NSR	4	primary	29.03.1962	01.11.1987	01.11.1987	133353	17201-2084734-9	3027609150

3	GHS Pir Sadoq		Israt ud Din	Chowkidar	NSR	4	nil	01/07/1961	19/02/1981	19/02/1981	19/02/1981	135228	17201-2270098-1	0313-9703172	NE
4	GSMHSHS Taru Jabba NSR	Wakeel Khan	Rasool Khan	Lab att:	NSR	4	nil	12/12/1962	02/04/1981			133716	17201-5914131-9	0302-5955962	NE
42	GHS RISALPUR	GULZAFAR	SAIB ZADA	Chowkidar	NSR	4		12/01/1962	01/11/1987	01/11/1987	01/11/1987	449643	17201-9438537-1	0348-5272190	NE
43	GPS No1 Shabara	Mian gul	Ajab gul	Chowkidar	NSR	4		11/03/1963	04/11/1987	04/11/1987		133243	17201-5751369-3		NE
44	GPS No2 Jallozai	Shad muhammad	Aziz ur rehman	Chowkidar	NSR	4		08/11/1967	10/11/1987	10/11/1987		133237	17201-2225218-7	3349451705	NE
45	GHS Gondary Payan	Samin Jan	Feroz Khan	Chowkidar	NSR	4		12/12/1964	18/11/1987	18/11/1987	18/11/1987	136258	17201-2150274-3	3161990460	NE
46	GPS Garhi Momin		Muhammad Amin	Chowkidar	NSR	4		22/01/1964	25/11/1987	25/11/1987		133373	17201-2320579-5	0305-9875648	NE
47	GHS ZKKS		Siddiq Ullah	Chowkidar	NSR	4		06/05/1967	25/11/1987	26/11/1987					NE
48	GHS Zakhi Qabristan	Sojeed Gul	Gulob Khan	Naib Qasid				31/12/1962	29/11/1987	29/11/1987	29/11/1987	135950	17201-2125474-1	0306-8095376	NE
49	GHS Pir Pai	Shams ur Rehman	Insha Jehan	Naib Qasid	NSR	5		01/07/1967	03/12/1987	03/12/1987		133966			NE
50	GPS Bahadar Khan Koroona	Adalat Sher	Hukam Khan	Chowkidar	NSR	4		20/06/1905	05/12/1987	22/12/1987					NE
51	GPS No1 Jabba khusk	Ihsan shah	Muzaffar shah	Chowkidar	NSR	4		0:0/1963	10/12/1987	10/12/1987		00133513	17201-220451-6	0344-9830615	
52	GPS GHALLAH DHER KOROONA	Izat Khan	Fatih Khan	Chowkidar	NSR			01/01/1968	21-12-1987	22-12-1987	22-12-1987	133388	17201-2203494-9	3439149715	NE
53	GPS LABUR COLONY AMANGARH	Ishfaq Ahmad	Muhammad Yaqoob	Chowkidar	NSR			30/12/1967	27-12-1987	28-12-1987	28-12-1987	133357	17201-2247282-9	0346-9110669	NE
54	GHS Adam zai	Sultan Khan	Ghafoor Khan	L/Attend	NSR	2		01/01/1960	28/12/1987						NE
55	GHS Pir Pai	Anwar Zaman	Banoos Khan	Sweeper	NSR	4		02/01/1966	13/01/1988	14/01/1988	24/02/2005	154699		0314-9706725	NE
56	GPS No:1 Akora Khattak	Nazir Ahmad	Abdur Raziq	Chowkidar	NSR	4	BA	14/09/1969	26/01/1988	26/01/1988	26/01/1988	133417	17201-6384762-9	0336-9509961	NE
57	GHS Mughalki	Niaz Wali Khan	Lajbar Khan	Sweeper	NSR	3		1962	14/02/1988	14/02/1988	14/02/1988				NE
58	Gps usman abad	Gul Daraz Khan	Waris Khan	Sweeper	NSR	4		01/01/1969	01/03/1988			860128	17201-6632467-5	0341-0503763	NE
59	GPS MARA-ZARAMIANA	Kifayat Ullah	Taqdeer ullah	Chowkidar	NSR			06/05/1968	15-3-1988	15-3-1988	15-3-1988	133517	17201-0925254-5	0333-9174274	NE
60	GHS Baghban Pura	Fozal Wahab	Muhammad Akbar	N/Q	NSR	4	SSC	01/01/1969	19/03/1988	19/03/1988	19/03/1988	153135	17301-14677249		NE
61	GPS Mula Killi No:1	Farzand Ali	Noor Badshah	Chowkidar	NSR	4	SSC	03/04/1968	28/03/1988	11/04/1988		00136395	17201-9610657-1	0307-5998473	
62	GHS Zakhi Qabristan	Zar Wali Khan	Amrut Khan	Chowkidar	NSR	4		01/01/1965	01/04/1988	01/04/1988	01/04/1988	136371	17201-2126362-5	0315-9773832	NE
63	GPS No:1 Aza Khel Payan	Rang Wali Shah	Abdul Ghafoor Shah	Chowkidar	NSR	4	SSC	12/03/1967	11/06/1988	11/06/1988	11/06/1988	133898	17201-7139887-5	0315-0182894	NE
64	GSMHSHS Taru Jabba NSR	Khan Bahadur	Gul Rehman	Behishti	NSR	4	nil	06/07/1963	03/07/1988			133720	17201-212240-5	0301-9113339	NE
65	GPS Khesghi Bala	Shamshad Khan	Ghulam Nabi	Chowkidar	NSR	4	nil	17/08/1961	01/09/1988	20/09/1988		00133593	17201-2772888-8	0342-8649502	NE
66	GPS Wazir garhi	Hussain khan	Khalid khan	Chowkidar	NSR	4	Nil	15/04/1961	20/09/1988	01/10/1988		133597	17201-9677636-5	3179790192	NE
67	GPS No:2 Pabbi	Saeed Ullah	Mohabat Shah	Chowkidar	NSR	4	SSC	10/04/1965	21/09/1988	21/09/1988	21/09/1988			3005895620	
68	GPS No 2 Pabbi	Saeed Ullah Khan	Mohabat Shah	Chowkidar	NSR	4	SSC	10/04/1965	21/09/1988	21/09/1988		133591	17201-2083325-1	0300-5895620	
69	GPS Dag behsud	Niaz muhammad	Qadar shah	Chowkidar	NSR	4	SSC	28/09/1970	28/09/1988	28/09/1988		133590	17201-9305257-5	3225088055	
70	GPS Shams Abad	Ikrom ul Haq	Yaqoob Khan	Chowkidar	NSR	4	SSC	00-00-1968	15/10/1988	31/03/1988	15/10/1988				
71	GPS TURLANDI NO.1	Shamsher Khan	Sabzali Khan	Chowkidar	NSR			12/01/1970	01/11/1988	13/1/1988	13/1/1988	133420	17201-2815657-9	0334-8923394	NE
72	GPS TURLANDI NO.2	Tajamul Khan	Shah Gul	Chowkidar	NSR			01/01/1967	01/11/1988	13-01-1988	13-01-1988	133421	17201-2375767-3	0314-9081326	NE
73	GPS SPIN KANA KALAN NO.2	Noor Muhammad Gul	Bidar Khan	Chowkidar	NSR			11/05/1970	05/11/1988	05/12/1988	05/12/1988	133574	17201-5101360-1	0349-9675201	NE
74	GMS Khesghi Payan	Zahid Ali	Shareef Ali	Naib Qasid	NSR	4	Middle	30/12/1973	20/11/1988	20/11/1988	20/11/1988	138035	17201-2589011-3	0345-9320106	NE
75	GHS JHANGIRA	Masood ur rahman	Muhammad Sano Ullah	Chowkidar	NSR	3		15/11/1967	28/11/1988	28/11/1988	28/11/1988	134042	17201-6223061-7	0334-8919329	NE
76	GHS Marhatti Bando	Mir Alan	Amir JAN	L/Attend	NSR	4		1959	01/12/1988	01/12/1988	01/12/1988	133445	17201-7091497-7	0311-1574935	NE
77	GPS Khan Sher Garhi	Amir Khan	Syed Ali Shah	Chowkidar	NSR	4		01/01/1970	01/01/1989	01/01/1989		134140	17201-2324233-3	0311-9375276	NE
78	GHS Zara Maina	Dul Wali	Rasool Khan	Sweeper	NSR	3		04/04/1965	04/04/1989	04/04/1989	04/04/1989	134172	17201-1536752-5	0311-9398120	NE
79	GHS Baghban Pura	Zia ur Rehman	Habib ur Rehman	Behishti	NSR	3		01/01/1966	01/09/1989	01/09/1989	01/09/1989	138556	17201-2150385-1		NE
80	GSMWHS Pir Piai	Hamid Afzal	Sher Afzal Khan	Beshishti	NSR	4	SSC	02/04/1971	04/09/1989	07/09/1989	07/09/1989	133971	17201-3937113-9	0310-9508549	
81	GHS Aman Garh	Muhammad ismail	Sher Bahadar	Lab: Attentt	NSR	4	SSC	14/05/1964	09/09/1989	09/09/1989	09/09/1989				
82	GHS Badrashi	Mehrab Gul	Ziarat Gul	Naib Qasid	NSR	5	SSC	01/04/1972	11/10/1989	11/10/1989	11/10/1989	135000	17201-2096144-7	0321-9083750	
83	GHS Khoisari	Malik Zaman	Qamar Din	Sweeper	NSR	4		02/09/1964	05/11/1989	05/11/1989		133921	17201-2177624-9		NE
84	GHS Zara Maina	Ashfaq Ahmad	Mirnowaz Khan	Naib Qasid	NSR	3	SSC	03/04/1970	04/12/1989	04/12/1989	04/12/1989	134169	17201-3919412-5	0333-9177090	
85	GPS Nowshera Kalan No:3	Marjan Ali	Mohammad Aslam Khan	Chowkidar	NSR	4	MIDDLE	08/08/1967	04/12/1989			00134170	17201-6011580-1	0322-9011645	NE

4	GSMHSHS Taru Jabba NSR	Wakeel Khan	Rasool Khon	Lab att.	NSR	4	nil	01/07/1961	15/06/1981	19/02/1981	19/02/1981	135228	17201-2170458-1	0313-9703172	NE
86	GPS ASHA KHEL.	Mir Haider	Sadbar Gul	Chowkidar	NSR	4	SSC	12/12/1962	02/04/1981			133716	17201-5914131-9	0302-5955962	NE
87	GPS Asha Khel	Mir Haider	Sadbar Gul	Chowkidar	NSR	4	SSC	12/09/1973	12/12/1989	20-12-89	20-12-89	941833	17201-217637-5	0301-3011694	
88	GSSSHS D I KHEL	Maqsood Shah	Bustan Khan	MALI	NSR	4	middle	13/04/1963	07/01/1990	03/01/1990	03/01/1990	133860	17201-21621655-7	0302-5770277	NE
89	GSMHSHS Taru Jabba NSR	Ziarat Gul	Fatha Muhammad	Chowkidar	NSR	4	nil	17/01/1965	17/01/1990			136486	17301-6203669-3	0331-5971773	NE
90	GHS RISALPUR	JAHANZEB	FAQIR UHAMMAD	Naib Qasid	NSR	4		24/01/1962	25/01/1990	25/01/1990	25/01/1990	133834	17201-2178508-5	0323-631035	NE
91	GPS NOWSHERA CANTT NO.3	Haider Ali shah	Muzammil Khan	Chowkidar	NSR	4	SSC	14/08/1969	05/02/1990			134234	17201-217637-5	0342-7675746	
92	GMS Aman Koi	Abdul Munaf	Habib Khan	N/Q	NSR	4		02/02/1972	24/02/1990	24/02/1990	24/02/1990	134195	17201-2697707-7	0333-9033830	NE
93	GPS Kishu Pul	Khaista Rehman	Ali Haider	Chowkidar	NSR	4	nil	01/01/1969	01/03/1990	01/03/1990		00134207	17201-2853004-9	0315-0917105	NE
94	GHS RISALPUR	ABDUL RAHMAN	MIR MUHAMMAD	Behishti	NSR	4		09-0-71	11/03/1990	11/03/1990	11/03/1990	133835	17201-2304011-5	0300-5771857	NE
95	GPS Nasir Kalay	Muhammad Shafiq	Abdul Rasheed	Chowkidar	NSR	4		19/03/1964	11/04/1990	11/04/1990		138740	17301-1658520-9	0332-9858592	NE
96	GPS No 2 Taru Jabba	Zahir Shah	Mehmood Shah	Chowkidar	NSR	4		25/12/1966	11/04/1990	11/04/1990		138744	17301-7225882-7	0348-1943981	NE
97	GPS SPIN KANY KALAN NO.3	Aman Gul	Banar Gul	Chowkidar	NSR	4		05/12/1970	12/04/1990	16/12/1990	16/12/1990	138548	17201-2231222-5	0346-9135674	NE
98	GHS Badroshi	Muhammad Wafeed	Kojeer Khan	Behishti	NSR	4		1970	14/04/1990	14/04/1990	14/04/1990	138738	17201-2125393-5	0322-9114790	NE
99	GPS No 1 Pahbi	Niaz Ali Khan	Khyber Khan	Chowkidar	NSR	4		25/10/1962	14/04/1990	14/04/1990		134241	17201-7699990-1	0321-9752890	NE
100	GPS SHAIKHI NO.1	Yad Gul	Dedar Gul	Chowkidar	NSR	4		16/04/1971	16-04-1990	16-04-1990	16-04-1990	134267	17201-2146670-1	0307-5107904	NE
101	GPS Khushmaqam	Jehan Zeb	Wali Muhammad	Chowkidar	NSR	3		12/05/1962	24/04/1990	24/04/1990		134277	17201-2327770-3	0306-2952626	NE
102	GPS No:3 Nowshera Cantt;	Haider Ali Shah	Muzammil Shah	Chowkidar	NSR	4	SSC	14/08/1969	02/05/1990	02/05/1990	02/05/1990				
103	GHS Baghban Puro	Samarqand	Muhammad Umar	N/Q	NSR	4	SSC	02/04/1965	02/05/1990	02/05/1990	02/05/1990	134918	17201-21344713		
104	GPS BAHADIR KHEL NO.1	Muhammad Ayaz	Lal Badshah	Chowkidar	NSR	4		12/07/1970	05/05/1990	06/01/1990	06/01/1990	138708	17201-1630978-3	0345-9715984	NE
105	GPS Hakeem abad	Zahir Shah	Said afzal	Chowkidar	NSR	4		0/0/1965	08/05/1990	08/05/1990		138711	17201-7346083-7	3005870426	NE
106	GSMHSHS Taru Jabba NSR	Syed Zahir Shah	Syed Usman Shah	Naib Qasid	NSR	4	FA	02/11/1972	01/07/1990			134300	17201-2097648-7	0333-9045825	NE
107	GPS No 1 Qasim	Bakhtiar Ahmad	Muhammad Khan	Chowkidar	NSR	4		01/01/1972	10/08/1990	10/08/1990		138525	17201-2736838-3	0315-9040639	NE
108	GHS Zohi Qabriston	Firdos Khan	Ghuncha Gul	Naib Qasid	NSR	4		21/05/1965	24/09/1990	24/09/1990	24/09/1990	138773	17201-2159272-1	0315-7898024	NE
109	GHS Mali Khel Bala	Soman Gul	Farid Gul	Lab: Attent	NSR	4	MA, B.Ed	05/03/1969	15/10/1990	15/10/1990	15/10/1990				
110	GPS Afrido Killi	Amanat Khan	Mir Rehman Shah	Chowkidar	NSR	4	nil	02/01/1962	14/11/1990	15/11/1990		00138766	17201-78763823	0344-4781932	NE
111	GPS Saice Mandi	Ali Mohammad	Saeed Syed	Chowkidar	NSR	4	SSC	14/04/1970	20/11/1990	20/11/1990		00138544	17201-4333753-1	0300-5905933	NE
112	GPS Rahim Ullah Koroona	Hassan Gul	Hashim Khan	Chowkidar	NSR	4	nil	1966	22/11/1990	22/11/1990		00138553	17101-0349592-1	0345-9056883	NE
113	GPS No 2 Tarkha	Akhtar Gul (Disable)	Said Khan	Chowkidar	NSR	4		01/08/1967	01/12/1990	01/12/1990		138574	17201-2208579-1		NE
114	GHS Kotli Sale Khana	Nawazish Ali	Rozi Shah	N.Q	NSR	5		10/03/1965	16/12/1990	16/12/1990	16/12/1990	139822	17201-2192015-5	0300-5971254	NE
115	GMS Pabbi	Javed Ahmad	Asif Khan	Sweeper	NSR	4		24/01/1963	23/12/1990	23/12/1990	23/12/1990	138527	17201-2090311-3	0315-9880745	NE
116	GHS Hisar Tang	Mir Azam Khan	Saeed Ullah Khan	N/Q	NSR	4		06/11/1969	01/01/1991	01/01/1991	01/01/1991	138573	17201-2272647-5	0315-9872859	NE
117	GPS Garhi Abdul Jabbar	Noor Wali Shah	Niaz Ali Shah	Chowkidar	NSR	4		01/01/1963	01/01/1991	01/01/1991		138554	17201-8529936-7	0300-5959050	NE
118	GHS Samandar Ghari	Lajaber Khan	Daleel Khan	Behishti	NSR	4	MIDDLE	01/01/1965	15/01/1991	15/01/1991	15/03/2006	139940	17201-2220117-1	0314-9158630	NE
119	GPS Sheikh Ahmad Baba	Noor Islam	Muhammad Ishaq	Chowkidar	NSR	4	SSC	20/01/1970	18/01/1991	18/01/1991	18/01/1991	138941	17201-2156163-3	0345-6196308	NE
120	GPS Sheikh Ahmad Baba	Noor ul Islam	Mohammad Ishaq	Chowkidar	NSR	3		20/03/1970	18/01/1991			00138941	17201-2156163-3	0345-6196308	NE
121	GHS AKBAR PURA	Faqir Gull	Ahmad Khan	Naib Qasid	NSR	4		05/09/1973	28/04/1991	28/04/1991	30/06/2001	138589	17201-48362957	0302-5573489	NE
122	GPS Rashakai No.1	Siyar Mohammad	Fazal Qadir	Chowkidar	NSR	4	MIDDLE	10/02/1970	07/05/1991	07/05/1991		00138587	17201-8317601-9	0310-9490950	NE
123	GPS Rashakai No.1	Yar Muhammd	Dost Muhammad	Chowkidar	NSR	4	MIDDLE	10/02/1970	07/05/1991	07/05/1991			17201-8317601-9	0334-9455499	NE
124	GPS Kandar	Muhammad Ibrahim Jan	Rahman Gul	Chowkidar	NSR	4	FA	04/04/1976	15/05/1991	15/05/1991	15/05/1991				
125	GPS Kandar	Mohammad Ibrahim Jan	Rehman Gul	Chowkidar	NSR	5	FA	04/04/1976	15/05/1991			00138512	17101-0313703-3	0311-5859060	
126	GPS AC CENTER NSR CANTT	Riaz Amin	Hazrat Umer	Chowkidar	NSR	4	SSC	19/05/1971	18-05-1991			402140	17201-8202800-9	0300-5846208	
127	GSMWHS Pir Piai	Muhammad Irshad	Habib ur Rehman	Mali	NSR	4		29/05/1963	20/05/1991	29/05/1991	29/05/1991	140249	17201-3533443-9	0308-8507113	NE
128	GHS Spin Khak	Muhammad Riaz	Muhammad Sharif	Cook	NSR	3		06/05/1973	28/05/1991	28/05/1991		139911	17201-2188684-5	0322-2552482	NE
129	GHS Aza Khel Payan	Muhammad Riaz	Anwar Badshah	N/Qasid	NSR	4		15/07/1973	17/07/1991	17/07/1991	17/07/1991	140254	17201-2299689-1	0342-7340481	NE
130	GHS Pir Pai	Minhaj Khan	Gul Akbar	Chowkidar	NSR	4			29/08/1991	29/08/1991		138511			NE
131	GPS Banda Malahan	Dilawar Khan	Masam Khan	Chowkidar	NSR	4		01/01/1966	01/09/1991	01/09/1991		153788	17201-3308240-6	0301-2955662	NE

3	GHSS Pir Saluq		Israr ud Din	Chowkidar	NSR	4	nil	01/07/1961	19/07/1981	19/02/1981	15/02/1981	135278	17201-2270098-1	0313-9703172	NE
4	GSMHSHS Tru Jabba NSR	Wakeel Khan	Rasool Khan	Lab attent	NSR	4	Nil	12/12/1962	02/04/1981			133716	17201-5914131-9	0302-5955962	NE
132	GPS NO.3 PIR PIAI (IAN AHAD)	Atlas Khan	Banaras Khan	Chowkidar	NSR			01/07/1972	09/09/1991	10/01/1991	10/01/1991	4021425	17201-2090776-5	0310-9415136	NE
133	GPS Sikander Abad	Fateh Khan	Rehmat Ullah	Chowkidar	NSR	4		1969	08/10/1991				17201-5777471-1	0317-1439072	NE
134	GSAASH Dagbehsud		Musharof Khan	Lab: Attent	NSR	4	SSC	29/10/1973	21/10/1991	21/10/1991	21/10/1991				NE
135	GHSS DAGI BANDA	Muhammad ali Khan	Molouk Khan	Behishti	NSR	4		24/12/1991	24/12/1991	24/12/1991	24/12/1991				NE
136	GHS Misri Banda	Rozi Khan	Mehmood Khan	Chokidar	NSR	4		13/01/1967	12/01/1992	13/01/1992		139878	17201-2250129-7	0334-8945392	NE
137	GHS Behram Killi		Madad Khan	Lab: Attent	NSR	3		11/04/1970	14/02/1992	14/02/1992	14/02/1992				NE
138	GHS Manahi		Hosham Khan	Noib Qasid	NSR	4	SSC	02/12/1968	20/02/1992	20/02/1992	20/02/1992				NE
139	GHS Gondary Payan	Ali Jahar	Bahadur Khan	Chowkidar	NSR	3		07/02/1969	23/02/1992	23/02/1992	23/02/1992	139669	17201-2179606-3	0347-9454413	NE
140	GHS Wattar		Usman Gul	N/Qasid	NSR	4		31/12/1986	12/04/1992	12/04/1992		139002	17201-2193550-9	0305-4201905	NE
141	GHS Kana Khel	Manzar Alam	Bakht Rowan	Sweeper	NSR	4		28-08-1871	04/05/1992	04/05/1992	04/05/1992	139026	17201-2871268-1	0344-5496982	NE
142	GHS Bara Banda		Gultaz Ahmad	Lab: Attent	NSR	3		1966	22/05/1992	22/05/1992	22/05/1992	140042	17201-2807868-1	0316-1214611	NE
143	GHS Mulla Killi	Jan Alam	Fazli Elahi	Sweeper	Char	5	FA	15/03/1964	31/05/1992	31/05/1992	31/05/1992	140232	17101-8830825-1	0311-8321537	NE
144	GPS Sher abad	Sher bahadar	Sher afzal	Chowkidar	NSR	4		30.04.1964	02/06/1992	02/06/1992		139014	17201-2175560-9	3005870658	NE
145	GSMWHS Pir Piai	Fazli Rabi	Fazli Rahim	Naib Qasid	NSR	4		15/07/1963	17/06/1992	17/06/1992	17/06/1992	140264	17201-7645501-9	0305-9230061	NE
146	GHS Badroshi	Wazir Khan	Syed Akber	Naib Qasid	NSR	5		23/03/1964	27/06/1992	27/06/1992	27/06/1992	140259	17201-2178027-5	0300-9048987	NE
147	GHSS Jalozai	Nowsherowan	Sher Afzal	Lab: Attent	NSR	4	FA	10/03/1970	01/07/1992	01/07/1992	01/07/1992				NE
148	GHS Nowan Killi NSR	Muhammad iqbal	Abdul Qoyyum	Naib Qasid	NSR	4			03/09/1992						NE
149	GPS No1 Spin khak	Ezzat khan	Latif khan	Chowkidar	NSR	3		02/02/1965	19/09/1992	19/09/1992		133384	17201-2187528-3	3151954691	NE
150	GPS NAZIR ABAD	Raees Khan	Nazir Khan	Chowkidar	NSR			01/01/1975	21-9-1992	22-9-1992	22-9-1992	139065	17201-2271216-9	0347-2939554	NE
151	GHSS Kheshgi Payan	Abdur Roheem	Rozo Khan	Naib Qasid	NSR	4	BA	09/10/1975	19/10/1992	19/10/1992	19/10/1992				NE
152	GPS Kheshgi Pavan No:1	Tahir Shah	Zahir Shah	Chowkidar	NSR	4		01/01/1975	27/10/1992	28/10/1992		00138593	17101-2731718-7	0305-9004823	NE
153	GHS Kheshgi Bala	Raees Khan	Farid Khan	Naib Qasid	NSR	4	SSC	05/03/1975	11/12/1992	11/12/1992	11/12/1992				NE
154	GHS Pahari Katti Khel	Khial Nawab	Khana Din	Chowkidar	NSR	4	SSC	16/01/1971	01/01/1993	01/01/1993	01/01/1993			3169006120	NE
155	GPS Toorder	Khizar Hayat	Aslam Khan	Chowkidar	NSR	4	Nil	12/10/1967	07/02/1993	07/02/1993		00341419	17201-2299508-1	0349-1934679	NE
156	GPS Gandheri Bala	Darvesh Khan	Taj Mohammad	Chowkidar	NSR	4	MIDDLE	01/01/1967	15/02/1993	15/02/1993		00309577	17201-8695061-9	0315-9171069	NE
157	GPS No4 Jalozai	Meesaq ahmad	Fazal muhammad	Chowkidar	NSR	2		02/02/1965	02/03/1993	02/03/1993		138463	17201-2304763-1	3151954691	NE
158	GPS GUL ABAD WALAI	Said Rehman	Spinal Khan	Chowkidar	NSR			01/12/1972	14-03-1993	14-03-1993	14-03-1993	309588	17201-2108626-9	0315-4453542	NE
159	GPS No 2 Qasim	Musharif Khan	Said Ullah Khan	Chowkidar	NSR	4		01/01/1975	15/03/1993	20/03/1993		341473	17201-2241203-9	0305-9875271	NE
160	GPS SHAHAB KHEL	Hameed Khan	Eisa Khan	Chowkidar	NSR			01/07/1963	13-4-93	13-4-93	13-4-93	309534	17201-2239476-7	0345-9321694	NE
161	GPS Tandail Koroon	Fazal Ghani	Rokhan Gul	Chowkidar	NSR	4		30/01/1965	15/04/1993			00341435	17201-0311057-1	0306-8366588	NE
162	GSMWHS Tarkha	Falak Niaz	Musharof Khan	MALI	NSR	4		01/04/1966	18/04/1993	18/04/1993	18/04/1993	139836	17201-2289588-5	0311-5258825	NE
163	GHS Banda Sheikh Ismail	Shah Hussain	Noor Muhammad	Behishti	NSR	4		14/09/1963	25/04/1993	25/04/1993	25/04/1993	140168	17201-2256965-3	0302-2383815	NE
164	GHS Banda Sheikh Ismail	Hamayoun Khan	Akram Khan	Chowkidar	NSR	4		01/04/1972	29/04/1993	29/04/1993	29/04/1993	138447	17201-2198023-1	0306-8013693	NE
165	GHS PALOSI PAYAN	Nisar Muhammad	Jan Muhammad	Chowkidar	NSR	4		10/10/1973	29/04/1993	29/04/1993	29/04/1993	140057	17201-2211391-9		NE
166	GSSSHS DI KHEL	Ismail shah	Umar shah	Sweeper	NSR	4		03/05/1974	29/04/1993	01/05/1993	01/05/1993	139830	17201-2190112-9	0301-8943774	NE
167	GPS PITAW BALA	Qadeer Khan	Farid	Chowkidar	NSR			01/01/1971	04/05/1993	04/05/1993	04/05/1993	309583	17201-229230-8	0346-5660363	NE
168	GHSS RISALPUR	WISAL KHAN	DALASA KHAN	Chowkidar	NSR	3		1960	22/05/1993	22/05/1993	22/05/1993	333894	17201-2293371-3	0312-9369787	NE
169	GPS MUHAMMAD SHAH KOROONA	Yousaf ali	Muhammad Shah	Chowkidar	NSR				01/07/1993	01/07/1993	01/07/1993	341425	17201-2134390-1	0333-9038933	NE
170	GPS Bara Banda No:2	Zail Khan	Shams ur Rehman	Chowkidar	NSR	4	MIDDLE	1967	01/07/1993	01/07/1993	01/07/1993	00341420	17201-1935716-5	0321-9731343	NE
171	GHSS Pashtoon Garai	Jans Khan	Ashraf ud Din	Behishti	NSR	4		03/01/1963	10/07/1993	11/07/1993	11/07/1993	140186	17201-22685181	0311-9416357	NE
172	GHS Bara Banda	Minaf Ali	Fozal Shah	Naib Qasid	NSR	3		01/03/1969	23/08/1993	23/08/1993	23/08/1993	139855	17201-2205077-5	0322-9960549	NE
173	GHSS AKBAR PURA	Zareef Khan	Lal Zada	Behishti	NSR	3		12/09/1963	12/09/1993	12/09/1993	12/09/1993	139827	17201-20824865	0300-5916855	NE
174	GPS Nowshera Kalan No.2	Ehadat Shah	Zai dullah Jan	Chowkidar	NSR	4	nil	12/04/1962	22/09/1993	23/09/1993		00354105	17201-2263177-3	0323-9772093	NE
175	GMS Chowki Mamraz	Naseer Ahmad	Muhammad Qasim	Sweeper	NSR	4	Middle	19/06/1971	29/09/1993	02/10/1993	02/10/1993	140720	17201-2192498-7	0311-9225934	NE
176	GSMWHS Pir Piai	Meher Rehman	Muhammad Uyounas	Chowkidar	NSR	4		04/04/1971	02/10/1993	02/10/1993	02/10/1993	140180	17201-2293066-1	0302-8822214	NE
177	GCMHS Akora Khottok	Nadeem Akhtar	Ali Akhtar	Naib Qasid	NSR	4	SSC	01/05/1970	05/10/1993	05/10/1993	05/10/1993	140296	17201-2086930-7	0336-9432128	NE
178	GMS Chowki Mamraz		Faqir Muhammad	Naib Qasid	Pesh	4	SSC	02/01/1977	19/10/1993	19/10/1993	19/10/1993	140305	17301-1372080-5	0313-9709463	NE

3	GHS Pir Sahar		Israr ud Din	Chowkidar	NSR	4	nil	01/07/1961	19/02/1981	19/02/1981	19/02/1981	135228	17201-2270058-1	0313-9793177	NE
4	GSMHSHS Taru Jabba NSR	Wakeel Khan	Rosool Khan	Lab att:	NSR	4	NIL	12/12/1962	02/04/1981			133716	17201-5914131-9	0302-5955962	NE
179	GHS Spin Kano Kolan	Wilayat Khan	Zarabat Khan	N/Q	NSR	4	FA	05/09/1969	19/10/1993	19/10/1993	19/10/1993	140218	17201-2170065-9	0306-5026552	NE
180	GHS ZKKS	Mushtaq Ud Din	Satar Ud Din	N/Q	NSR	4		04/01/1968	24/12/1993	24/12/1993					NE
181	GPS RAILWAY STATION NO.6 NOWSHERA CANTT		Bahar Uddin	Chowkidar	NSR			19/02/1972	21-02-1994	21-02-1994	21-02-1994	138044	17201-1151811-7	0305-0398603	NE
182	GHS Pir Sahar	Muhammad Shouib	Sheraz Gul	Behishti	NSR	4		01/07/1973	01/04/1994	01/04/1994	01/04/1994	139897	17201-2297556-9	0310-9042123	NE
183	GMS Aziz Abad	Yousaf Khan	khan	Naib Qasid	NSR	4		1969	09/04/1994	19/04/1994	19/04/1994	140343	17201-4386381-7	0348-2302845	NL
184	GPS Zakhri Nuhna	Hakshesh Khan	Sher Muhammad	Chowkidar	NSR	3		19/02/1966	13/04/1994	13/04/1994		341431	17201-9640274-9	0303-8921607	NE
185	GPS Hamza Rashaka No 3	Sartaj Khan	Amin Ullah Khan	Chowkidar	NSR	3	NILL	1964	21/04/1994	21/04/1994		00354042	17201-2289849-7	0342-9131125	NE
186	GHS Aza Khel Bala	Manzoor Ul Haq	Ali Haider	Naib Qasid	NSR	3		07/07/1971	12/05/1994	12/05/1994	12/05/1994				NE
187	GHS Ali Baig	Amir Ul Bashor	Alij Din	Chowkidar	NSR	4		19/07/1975	13/05/1994	13/05/1994	13/05/1994	140314	17201-2646813-7	0310-5976518	NE
188	GHS Ali Baig	Shoukat Khan	Malang Khan	Behishti	NSR	3		05/02/1973	13/05/1994	13/05/1994	13/05/1994	140311	17201-2275607-5	0333-9618247	NE
189	GHS Marooba	Fazli Karim	Lab Madin	Behishti	NSR	4		19/03/1960	16/05/1994	16/05/1994		140321	17201-2125000-9	0301-5009842	NE
190	GHS Marooba	Subhan Ud Din	Hakam Ud Din	Lab: Attent	NSR	3		06/02/1969	16/05/1994	16/05/1994	16/05/1994	140324	17201-2088347-3	0307-8326231	NE
191	GMS SIAV	Siraj Khan	Sher Afzal Khan	Sweeper	NSR	2		01/01/1976	19/05/1994	19/05/1994	19/05/1994	140312	17201-847140-5		NE
192	GHS No:2 Cantt	Habib ul Haq	Fazal Ghani	Beheshti	NSR	4	SSC	15/02/1975	27/05/1994	27/05/1994	27/05/1994			3453724931	
193	GMS Aziz Abad	Zaman Khan	Shero din	Sweeper	NSR	4		13/01/1960	10/07/1994	10/07/1994	10/07/1994	140491	17201-6648920-5	0343-3814941	NE
194	GHS Aza Khel Bala	Irfan Ullah	Sharif Gul	Lab: Attent	NSR	3		07/01/1961	15/08/1994	15/08/1994	15/08/1994				NE
195	GPS Shaheen Abad	Muhammad Shabeer	Ustra Khan	Chowkidar	NSR	4	FA/PTC	11/10/1975	31/08/1994	31/08/1994	31/08/1994			3433385730	
196	GPS MANKI SHARIF NO.2	Sartaj Khan	Muhammad Sharif	Chowkidar	NSR			19/03/1968	27-09-1994	27-09-1994	27-09-1994	358153	17201-8964696-3	0344-8910104	NE
197	GPS ARMOUR HOUSING COLONY NSR	Fazli maalik	Muhammad Amin	Chowkidar	NSR			16/02/1976	05/11/1994	05/12/1994	05/12/1994	138774	17201-2214309-9	0332-9317237	NE
198	GHS Camp Karoona	Fakhar Zaman	Zinur Zaman	N/Q	NSR	4	SSC	26/03/1974	06/12/1994	06/12/1994					
199	GHS Khawrai	Sadar Amin	Muhammad Usman	L/ Attend	NSR	4	Middle	01/01/1962	06/12/1994	06/12/1994	06/12/1994	140469	17201-2192896-3	0313-9980587	NE
200	GHS Camp Karoona	Gohar Ali	Ruodad Khan	Sweeper	NSR	3	SSC PTC	23/04/1961	06/12/1994	08/12/1994					
201	GHS JAROOBA	Sardar ali	Gul zado	Behishti	NSR	4		15/04/1971	07/12/1994	07/12/1994	07/12/1994	140504	17201-2253281-3	0314-9114589	NE
202	GHS Bakhtoi	Ziafat Hussain	Shah Dab Khan	Sweeper	NSR	4		01/07/1969	10/12/1994	10/12/1994		140497	17201-4932545-9	0308-8098251	NE
203	GSMHSHS Taru Jabba NSR	Muhammad Ayo	Khan Bahadar	Naib Qasid	NSR	4	NIL	09/10/1968	18/12/1994			140522	17201-2203957-1	0333-9108029	NE
204	GPS Safdar Khan Koroona	Bostan Khan	Safdar Khan	Chowkidar	NSR	4	NILL	1971	05/01/1995	05/01/1995		00345384	17201-2310166-3	0301-8868675	NE
205	GHS Kano Khel	Abdul Hanan	Shamran Khan	Naib Qasid	NSR	4		01/01/1975	31/01/1995	01/02/1995	01/02/1995	140611	17201-2063113-9	0343-9014601	NE
206	GSWIHS Tarkha	Burhan Ullah	Syed Afzal	Behishti	NSR	4		31/07/1973	01/03/1995	01/03/1995	01/03/1995	140596	17201-2255531-9	0313-0915694	NE
207	GPS SHAIKAY NO.2	Awal Said	Khan Said	Chowkidar	NSR			20/10/1976	07/05/1995	11/07/1995	11/07/1995	349676	17201-2326061-1	0304-0000118	NE
208	GPS Ghulam Rasool Koroona	Sher Alam	Sher Afzal	Chowkidar	NSR	4		1967	16/05/1995			00333953		0344-9133870	NE
209	GPS Fazal abad	Ashraf gul	Fazal gul	Chowkidar	NSR	3		01/07/1978	18/05/1995	18/09/1995		361532	17201-1191150-3	3005322659	NE
210	GHS Khair Abad	Umar Bacho	Afzal Shah	L/ Attend	NSR	4		01/05/1977	01/06/1995	01/06/1995	01/06/1995	141050	17201-	0303-8587504	NE
211	GHS Khat Killi	Syed Akmal Shah	Shams ul Wahid	Naib Qasid	NSR	4	BA	03/06/1961	01/08/1995	01/08/1995	01/08/1995	137297	17201-2260032-1	0346-5670351	
212	GMS Gul Dhari	wilayat shosh	Ameer Muhammad K	Sweeper	NSR	4		10/01/1960	31/08/1995	31/08/1995	31/08/1995	140720	17201-6583436-5	0333-5738740	NE
213	GHS Aza Khel Bala	Nasrullah Khan	Ibadat Khan	Chowkidar	NSR	3		01/11/1976	31/08/1995	01/11/1995	01/11/1995				NE
214	GHS Zakhri Qabriston	Saeed urRehman	Habib ur Rehman	Behishti	NSR	4		13/04/1977	01/09/1995	01/09/1995	01/09/1995	140723	17201-8412339-3	0301-8833859	NE
215	GPS Namdar Khel	Shabeer Ud Din	Lal Din	Chowkidar	NSR	4	SSC	01/07/1970	10/10/1995	10/10/1995	10/10/1995			3465670351	
216	GPS No2 M Wazir Gari	Ikram Ullah	Fazal subhan	Chowkidar	NSR	4		01/07/1974	15/10/1995	15/10/1995		341438	17201-2270271-9	3339300947	NE
217	GPS No:2 Sheikhan	Noor Faraz	Baswar shah	Chowkidar	NSR	4	SSC PTC	03/11/1974	20/10/1995	20/10/1995	20/10/1995			3008331895	
218	GPS No2 Shekhan	Noor faraz	Baswar shah	Chowkidar	NSR	4	SSC	03/11/1974	22/10/1995	22/10/1995	22/10/1995	333781	17201-2228328-3	3008331895	
219	GHS ZKKS	Idrees Khan	Zaman Shah	Mali	NSR	4		00/0/1970	29/10/1995	01/11/1995					NE
220	GPS Rokhan Abad	Chaman Gul	Samin Gul	Chowkidar	NSR	3	FA	03/03/1970	01/11/1995	01/11/1995		00341674	17201-2259690-1	0300-5948460	
221	GPS Rokhan Abad	Chaman Gul	Sameen Gul	Chowkidar	NSR	4	FA	03/03/1970	01/11/1995	01/11/1995	01/11/1995			3005948407	
222	GPS Alamzeb Koroona	Janas Khan	Jehanzeb	Chowkidar	NSR	4	nil	04/04/1969	01/11/1995	01/11/1995		00341666	17201-6617638-9	0345-6366089	NE
223	GPS Natal	Noor Uj Amin	Khan Muhammad	Chowkidar	NSR	4		02/08/1977	14/11/1995	14/11/1995		348540	17201-4564340-9	0302-5966131	NE
224	GCMHS Akara Khattok	Muzaf Khan	Azeem Khan	Lab: Attent	NSR	4		01/05/1976	31/12/1995	01/01/1996	01/01/1996	137872	17201-2193909-5	0336-9422212	NE
225	GHS Kahi	Khurshid Zada	Khan Zada	L/ Attend	NSR	4	SSC	02/02/1976	01/01/1996	01/01/1996	01/01/1996	140897	17201-2199633-7	0302-3514508	
226	GHS JAROOBA	khyal zado	LalZado	L/ Attend	NSR	4		02/04/1963	01/01/1996	01/01/1996	01/01/1996	141014	17201-1131446-7	0307-878555	NE

4	GSMHS Taru Jabba NSR	Wakeel Khan	Rasool Khan	Lab att	NSR	4	nil	01/07/1961	15/02/1981	19/02/1981	19/02/1981	135228	17201-2270098-1	0313-9703172	NE	
					NSR	4	nil	12/12/1962	02/04/1981			133716	17201-5914131-9	0302-5955962	NE	
227	GPS PIR SABAQ NO.1	Asif ali	Haider Ali	Chowkidar	NSR	4		03/01/1977	04/01/1996	04/01/1996	04/01/1996	22560	17201-8401255-9	0312-9393962	NE	
228	GHSS RISALPUR	JAN MUHAMMAD	RAJ MUHAMMAD	MALI	NSR	4		02/02/1966	05/01/1996	05/01/1996	05/01/1996	141019	17201-2571070-5	0306-577803	NE	
229	GHSS Manki Sharif	Mujeeb Khan	Habib Ullah Khan	Naib Qasid	NSR	4		10/01/1973	28/01/1996	01/02/1996	01/02/1996	140955	17201-6130527-9	0313-9693019	NE	
230	GHS LC Aman Garh	Tahir Ali	Shah Jihan	N.Q	NSR	4	Middle	16/01/1970	06/03/1996	06/03/1996	06/03/1996	140941	17201-8671484-1	0335-6796604	NE	
231	GPS Serai Koroona	Nazar Ali	Sawab Gul	Chowkidar	NSR	4	nil	15/04/1967	09/04/1996	09/04/1996		03341434	17201-1427251-5	0300-5245230	NE	
232	GHSS ZKKS	Shahid Gul	Fazle Haq	L/Attendt	NSR	4		14/05/1972	14/05/1996	15/05/1996	15/05/1996	141053	17201-5105218-9		NE	
233	GPS Khan Shee Garhi	Gul Dad	Karim Jan	Chowkidar	NSR	4		01/01/1974	22/05/1996	22/05/1996		141129	17201-2240802-9	0336-5012204	NE	
234	GPS Nowshera Kalan No 2	Bakht Munir	Fazal Dahyan	Chowkidar	NSR	4	nil	13/02/1974	05/06/1996	05/06/1996		0033491	17201-34190-7	0336-7189140	NE	
235	GHS Inzari	Khanza Gul	Raheem Gul	L/Attend	NSR	4		09/09/1963	15/06/1996	15/06/1996	15/06/1996	141049	17201-2230007-5	0342-9000633	NE	
236	GPS NO.4 PIR PAI	Najmul Hassan	Shamroz Khan	Chowkidar	NSR	4		02/01/1961	04/09/1996	04/09/1996	04/09/1996	3-1663	17201-2278476-3	0313-9537224	NE	
237	GPS MEIRAJI PAYAN	Gul Faraz	Mewa Khan	Chowkidar	NSR	4		17/12/1978	16-10-1996	17-10-1996	17-10-1996	341466	17201-3442184-5	0315-5258340	NE	
238	GSMWHS Pir Piar	Iltaf Ahmad	Abdul Ghaffar	Najib Qasid	NSR	4		15/12/1970	01/11/1996	01/11/1996	01/11/1996	141124	17201-3046114-5	0313-9726183	NE	
239	GHSS No.1 Shaidu	Ameer Gul	Habib Gul	Sweeper	NSR	4	SSC	07/08/1974	12/11/1996	12/11/1996	12/11/1996	711442	17201-2246173-1	0322-5299407		
240	GPS Mula Killi No.2	Gohar Zaman	Mohammad Zaman	Chowkidar	NSR	4		01/07/2009	13/05/1997	13/05/1997		00346322	17201-6342700-9	0314-2354097	NE	
241	GPS Afrido Killi	Taj Ali	Mohammad Ali	Chowkidar	NSR	4	nil	03/04/1979	29/05/1997	29/05/1997		00507203	17201-22831043	0333-4484343	NE	
242	GMS AC Colony	Muhammad Abbas	Muhammad Yousof	Naib Qasid	NSR	4	SSC	13/03/1973	13/06/1997	13/06/1997	13/06/1997			3419760177		
243	GSWHS Tarkha	Wajad Khan	Abdur Rehman	Chowkidar	NSR	4	SSC	04/09/1974	25/06/1997	25/06/1997	25/06/1997	137723	17201-2969987-3	0303-5886412		
244	GHS Khowrai	Ayaz Khan	Shakeem Gul	Behishti	NSR	4	Middle	15/10/1978	01/07/1997	01/07/1997	01/07/1997	142132	17201-2215637-9	0321-9873018	NE	
245	GHS Misri Banda	Graan Gul	Yar Muhammad	L/Attendt	NSR	4	#VALUE!	01/07/1975	01/07/1997	01/07/1997	01/07/1997	137976	17201-2296836-7	0333-9001955	NE	
246	GHS Khowrai	Muhammad Zaman	Rustam Gul	Chowkidar	NSR	4	Middle	01/10/1976	01/07/1997	01/07/1997	01/07/1997	137936	17201-2852956-9	0322-9180980	NE	
247	GHS Darwazgai	Muslim Khan	abdul rozaq	Sweeper	NSR	4		01/01/1967	01/07/1997	01/07/1997	01/07/1997	139189	17201-0649545-1	0302-3515993	NE	
248	GMS Chowki Mamroz	Nizam Muhammad	Maqbal Khan	Behishti	NSR	4	SSC	20/11/1978	23/09/1997	28/06/1997	28/06/1997	139177	17201-2157776-3	0331-9308301	NE	
249	GPS Kotarpan No:2	Jehangir Khan	Ali Gul	Chowkidar	NSR	4	nil	10/02/1979	15/12/1997	16/12/1997		00545308	17101-8260932-3	0344-9864561	NE	
250	GHSS Pir Pai	Farid Ullah	Sahib Ullah	Chowkidar	NSR	4		01/01/1961	18/12/1997	03/01/1998	03/01/1998				NE	
251	GHS Banda Sheikh Ismail	Naveed Ahmad	Ghulam Muhammad	Naib Qasid	NSR	4		20/08/1979	29/12/1997	30/12/1997	30/12/1997	137244	17201-2157312-5	0331-5608179	NE	
252	GMS Sheikh Ahmad Baba	Abul Faiz	Said Rehman	Naib Qasid	NSR	4		15/04/1968	01/01/1998	01/01/1998	01/01/1998	137783	17201-7418297-5	0312-8198798	NE	
253	GPS Nowshera Kalan No:6	Abdul Waheed	Nazir Muhammad	Chowkidar	NSR	4	Nil	01/07/1974	16/01/1998	16/01/1998		0049069	17201-7893409-5	0312-595022-1	NE	
254	GPS No:1 Akora	Nazeer Ahmad	Abdur Raziq		NSR	4	B.A	14/09/1969	26/01/1998	26/01/1998	26/01/1998					
255	GHS Aman Garh	Asraf Ali	Khidmat Ali	Sweeper	NSR	4	SSC	01/03/1967	17/02/1998	17/02/1998	17/02/1998					
256	GPS Miskeen Koroona	Fida Mohammad	Nisar Mohammad	Chowkidar	NSR	4	MEDDL	30/03/1971	15/04/1998	15/04/1998		00354046	17201-7651940-5	0342-7468849	NE	
257	GPS Abbas Abad	Muhammad Zubair	Syed Akbar Shah	Chowkidar	NSR	4	F.A	01/01/1977	18/04/1998	18/04/1998	18/04/1998			17201-3903151-7	0313-9800301	
258	GHSS Khesghi Payan	Muhammad Asif	Ghulam Muhammad	Lab: Att:	NSR	4	B.A PTC	08/05/1973	28/04/1998	28/04/1998	28/04/1998			3018190029		
259	GHSS Khesghi Payan	Ibrahim Khan	Hamid Khan	Lab: att:	NSR	4	M.A CT Bed& Comp	03/01/1971	02/05/1998	02/05/1998	02/05/1998			3009046564		
260	GPS Mir Ahmad Koroona	Niamat Ali	Mir Ahmad Khan	Chowkidar	NSR	4		01/07/1967	04/05/1998			00309585	17201-2136764-3	0306-8087653	NE	
261	GPS Abdul Ghani Koroona	Farhad Ali	Sabz Ali	Chowkidar	NSR	4	nil	04/06/1978	25/05/1998	25/05/1998		00309526	17201-1372933-1	0344-8432474	NE	
262	GPS Ajab Bagh	Fazal Maulta	Hamid Ullah	Chowkidar	Nowshera	4		01/07/1962	02/07/1998	02/07/1998		309532	17201-4790687-3	0302-3514896	NE	
263	GMPS Jico Mughalki	Ubaid Ur Reman	Wali Ullah	N/Qasid	NSR	4	FA	02/02/1979	08/07/1998	08/07/1998	08/07/1998	138032	17201-1729573-5	0333-9047052		
264	GPS Shamsahad Ahad	Fazal Havat	Shamshad Khan	Chowkidar	NSR	4		14/03/1973	13/07/1998	13/07/1998		00345380	17201-2204954-9	0313-90906318	NE	
265	GHS Zando Banda	Aziz Ullah	Sardaraz Khan	Naib Qasid	NSR	4		15/02/1979	25/07/1998	25/08/1998	25/08/1998	137965	17201-1603268-1	0314-5050997	NE	
266	GHS Zando Banda	Sapir Ullah	Nawar Khan	Naib Qasid	NSR	4		19/02/1980	25/07/1998	25/08/1998	25/08/1998	137966	17201-3289095-3	0317-9603645	NE	
267	GMPS Jico Mughalki	Zar Talab Khan	Taj Bar Khan	Chowkidar	NSR	4		01/07/1968	07/08/1998	07/08/1998	07/08/1998	333932	17201-2139354	0336-9491104	NE	
268	GHS Afrido Killi	Irshad Khan	Sardaraz Khan	N/Qasid	NSR	3		00/00/1965	10/08/1998	10/08/1998	10/08/1998	137968	17201-2406379-3	0306-8307639	NE	
269	GPS Mohammad Khan Koroona	Abdul Malik	Abdul Khaliq	Chowkidar	NSR	4	F.A	28/04/1979	16/08/1998	16/10/1998		00309587	17201-2245623-7	0334-5290007		
270	GPS No3 Jaroha	Ajab noor	Khan wada	Chowkidar	NSR	4	Middle	15/01/1973	07/09/1998	07/09/1998		309578	17201-1289900-9	3189211565	NE	

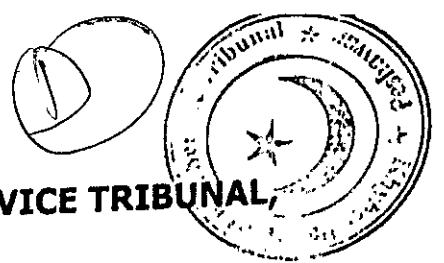
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4	GSMHSHT Toru Jabba NSR	Wakeel Khan	Rasaal Khan	Lab att:	NSR	4								
271	GPS BAHADAR KHEL NO.2	Niaz Muhammad	Masher Khan	Chowkidar	NSR		14/03/1963	15-09-1998			309582	17201-68844203	0348-8453626	NI
272	GPS Khor Abad	Fazal Akbar	Habib Ullah	Chowkidar	NSR	3	1974	24/09/1998			00341715	17201-3776250-1	0305-9242417	NI
273	GHS Adamzai	Khan Muhammad	Mian Khan	Chowkidar	NSR	4	09/11/1967	01/10/1998	01/10/1998	01/10/1998			310-9696265	
274	GHS Adam zai	Khan Muhammad	Mian Khan	Chowkidar	NSR	4	01/09/1967	07/10/1998	07/10/1998	07/10/1998	137992		0310-9696265	
275	GHS Adam zai	Sangeen Khan	Qadeem Khan	Sweeper	NSR	7	01/09/1962	07/10/1998	07/10/1998	07/10/1998	137993		0333-5840383	NI
276	GPS Zakhi Kuhna	Nawab Khan	Iqbal Khan	Chowkidar	NSR	3	01.07 1966	09 10 1998	09 10 1998		341667	17201-2174801-9	0300-1709001	NI
277	GPS GHALLA DHER NO.2	M Hajjaj	Said Muhammad	Chowkidar	NSR		03/06/1975	14-10-1998	14-10-1998	14-10-1998	341669	17201-22699999-1	0300-5946044	NI
278	GHS Garu	Aman Ullah	Faiz Azeem	Sweeper	NSR	3	01/01/1964	16/10/1998	16/10/1998	16/10/1998	138023	17201-2118128-1	0315-9396703	NI
279	GHS Garu	Said ullah	Qudrat Shah	Naib Qasid	NSR	4	12/03/1964	16/10/1998	16/10/1998	16/10/1998	138024	17201-2164557-3	0307-5661634	NI
280	GPS Rashakai No.2	Bahar Ali	Gohar Ali	Chowkidar	NSR	4	09/03/1979	16/10/1998	17/10/1998		00478760	17201-0286212-3	0300-5854532	
281	GPS Shereen Kotay	Hazrat Faqir	Syed Faqir	Chowkidar	NSR	4	1965	20/10/1998			00133302	17201-2270258-1	0308-8034155	NI
282	GHSS Ksheshgi Payan	Abid Muhammad	Fazal Muhammad	Naib Qasid	NSR	4	02/03/1972	22/10/1998	22/10/1998	22/10/1998			3009046564	
283	GHS Gharib Pura	Fazli Dayyan	Fazal Dad	Naib Qasid	NSR	3	1972	24/10/1998	24/10/1998	24/10/1998				NI
284	GHS Gharib Pura	Muhammad Ali	Sher Zaman	Sweeper	NSR	3	06/02/1975	24/10/1998	24/10/1998	24/10/1998				NI
285	GMS Ksheshgi Payan	Zafar ullah	Jamroz Khan	Sweeper	NSR	4	01/01/1974	28/10/1998	28/10/1998	28/10/1998	138022	17201-2251398-3	0315-3403295	NI
286	GPS Gandheri Payan	Suleman Shah	Raghan Shah	Chowkidar	NSR	4	10/03/1966	24/11/1998	19/08/2009		00341418	17201-7724361-7	0344-9140940	
287	GHS Spin kAni Khurd	Imam Ali Khan	Ajab Khan	N.Q	NSR	4	14/05/1905	03/12/1998	03/12/1998	03/12/1998	139412	17201-9358108-3	0346-4457270	NI
288	GHS LC Aman Gar	Israfil Ali	Khidmat Ali	Sweeper	NSR	4	01/03/1969	17/12/1998	17/12/1998	17/12/1998	139418	17201-2234912-5	0345-9307385	
289	GHS LC Aman Gar	Mar Jan	Khan Sardar Khan	N.Q	NSR	4	07/10/1980	17/12/1998	17/12/1998	17/12/1998	139419	17201-7471300-5		
290	GMS Aza Khel Bala	Ayoub Khan	Khushtar Gul	Naib Qasid	NSR	4	15/03/1980	22/12/1998	22/12/1998	22/12/1998	139433	17201-2220871-9	0343-9138918	NI
291	GSAHS Dag Behsud	Anwar Khan	Muhammad Ilyas	Chowkidar	NSR	4	03/03/1970	28/12/1998	28/12/1998	28/12/1998				
292	GPS Bara Banda No.1	Dustar Ali	Noor Ul Islam	Chowkidar	NSR	4	02/04/1976	01/01/1999	01/01/1999		00574734		0316-5484624	NI
293	GPS No2 Shah kot pavan	Safeer ullah	Banaras Khan	Chowkidar	NSR	4	15/10/1980	01/01/1999	01/01/1999		333759	17201-2083979-9	3038585456	NI
294	GHS Samandar Ghari	Shaukat ali	Gul Rahman	L/ Attend	NSR	4	30/12/1972	14/01/1999	14/01/1999	14/01/1999	139461	17201-2022075-7	0335-9003730	
295	GHSS Mahib Banda	Abdullah	Nasrullah Khan	L/ Attend	NSR	4	01/01/1971	01/02/1999	01/02/1999	01/02/1999	139434	17201-23249121	0331-9073080	NI
296	GHSS Khair Abad	Fazal Rabi	Noor Zada	L/ Attend	NSR	4	15/07/1973	19/02/1999	19/02/1999	19/02/1999	139459	17201-	0315-9820672	NI
297	GHSS Khair Abad	Zulfiqar	imran gul	Naib Qasid	NSR	4	22/12/1974	19/02/1999	19/02/1999	19/02/1999	139458	17201-	0310-9040837	NI
298	GMS Kotli Khurd	Azam Khan	Ghuncha Khan	Naib Qasid	NSR	4	01/07/1970	27/02/1999	27/02/1999	27/02/1999	138071	17201-4448858-7	0306-8782238	NI
299	GMS Aza Khel Bala	Rabi Ullah	Zaman Khan	Sweeper	NSR	4	01/08/1972	01/03/1999	01/03/1999	01/03/1999	138070	17201-4359877-7	0346-5670879	NI
300	GMS Sheikhi	Nasrullah Khan	Gul Azam Khan	Sweeper	NSR	4	1976	13/03/1999	13/03/1999	13/03/1999	138072	17201-2185142-7	0304-9755155	NI
301	GMS Sheikhi	Rustam Khan	Gul Azam Khan	Naib Qasid	NSR	4	1977	13/03/1999	13/03/1999	13/03/1999	138067	17201-670155-1	0311-0527067	NI
302	GHSS Manki Sharif	Muhammad Jehan Zaib	Khawaja Iltaf Hussain	Lab:Att:	NSR	4	11/09/1967	15/03/1999	15/03/1999	15/03/1999			3339188357	
303	GHSS Khair Abad	Shah Zad Khan	Rana Khan	Chowkidar	NSR	4	01/07/1976	15/03/1999	15/03/1999	15/03/1999	138093	17201-	0341-9405238	NI
304	GHSS Manki Sharif	Mahammad Jehan Zeb	Khawaja Iltaf Hussain	Lab: Attentt	NSR	4	11/09/1967	15/03/1999	01/04/1999	01/04/1999	138062	17301-1446512-1	0333-9188357	
305	GHS Samandar Ghari	Islam Ud din	Gulab Din	chowkidar	NSR	4	1962	27/03/1999	27/03/1999	27/03/1999	138056	17201-2119883-5	0314-9726601	NI
306	GHS Jabba Khushk	Meenadar Khan	Sobidar Khan	Behishti	NSR	3	01/07/1962	10/04/1999	13/04/1999	13/04/1999	138103	17201-2167141-9	0345-5167611	NI
307	GHS Jabba Khushk	Zaidar Khan	Namdar Khan	Chowkidar	NSR	3	05/01/1976	10/04/1999	13/04/1999	13/04/1999	138105	17201-2267149-9	0342-5254053	NI
308	GHSS Manki Sharif	Fazli Rahim	Amir Khan	Naib Qasid	NSR	4	19/02/1981	14/04/1999	16/04/1999	16/04/1999	138061	17201-2128710-9	0316-9937961	NI
309	GHSS Manki Sharif	Muhammad Adil Khan	Said Muhammad	Lab: Attentt	NSR	4	04/10/1972	14/04/1999	16/04/1999	16/04/1999	138060	17201-2206228-7	0300-5057904	NI
310	GHSS Manki Sharif	Wakil Ahmad	Zarin Shah	Chowkidar	NSR	4	01/07/1963	14/04/1999	19/04/1999	19/04/1999	138065	17201-7568813-3	0332-9043323	NI
311	GHSS Mahib Banda	Riaz Khan	Gul ssyed	Sweeper	NSR	3	01/01/1967	15/04/1999	15/04/1999	15/04/1999	138153	17201-23115673	0345-6263715	NI
312	GHSS Mahib Banda	Zahoor Hussain	Mir Hassan Khan	N.Q	NSR	4	02/01/1961	17/04/1999	17/04/1999	17/04/1999	154403	17201-22055775	0334-9113431	NI
313	GHS Baghban Pura	Muhammad Zafar	Muhammad Nisar	Lab: Attentt	NSR	4	10/04/1974	23/04/1999	23/04/1999	23/04/1999	138148	17201-21213831	0333-9027484	
314	GHS Darwazgai	Shokat Khan	ajeeb Khan	N.Q	NSR	4	06/04/1974	23/04/1999	23/04/1999	23/04/1999	138074	17201-1938635-1	0315-9344672	NI
315	GHS Hisar Tang	Mahfooz Baig	Rashan Baig	Sweeper	NSR	4	22/04/1969	24/04/1999	24/04/1999	24/04/1999	138068	17201-4848396-3		NI
316	GHS Shah Kot	Naveed Gul	Shaunadar	Lab: Attentt	NSR	4	18/01/1973	01/05/1999	01/05/1999	01/05/1999	138122	17201-2084913-7	0302-5920742	NI
317	GHSS No.1 Shaidu	Saraf Khan	Sarbilanad Khan	N/Qasid	NSR	4	01/07/1964	01/05/1999	01/05/1999	01/05/1999	137312	17201-1883761-1	0334-9130541	NI
318	GMS Kotli Khurd	Sher Afzal	Dedar Khan	Sweeper	NSR	4	30/12/1978	03/05/1999	03/05/1999	03/05/1999	138270	17201-2141832-9	0306-80096427	NI
319	GHS Banda Nabi	M. Farooq Akhtar		Sweeper	Pesh	3	09/11/1975	12/05/1999	12/05/1999	12/05/1999	139161	17301-1378143-1	0312-9063277	NI
320	GPS Batakza	Noor Ul Wahab	Tawab Khan	Chowkidar	NSR	4	1974	18/05/1999	18/05/1999		00333936	17201-2300337-3	0306-8781798	



1	GHS Pir Sabaq		Israt Khan	Chowkidar	NSR	4	nil	01/07/1963	19/02/1981	19/02/1981	19/02/1981	135278	17201-2270098-1	0313-9703172	NE
4	GSMHS Taru Jobba NSR	Wakeel Khan	Rasool Khan	Lab att:	NSR	4	NIL	12/12/1963	02/04/1981			133716	17201-5514131-9	0302-5555962	NE
221	GPS DEHRI KATI KHEL NO.2	Hazrat Amin	Hazrat Umar	Chowkidar	NSR			01/01/1963	15-06-1999	15-06-1999	15-06-1999	332861	17201-5004017-3	0336-9909571	NE
222	GHS Manki Sharif	Sher Nawaz Khan	Israt Khan	Lab: Attenti	NSR	4		07/05/1963	19/07/1999	19/07/1999	19/07/1999	138064	17201-3666323-	0316-9530071	NE
223	GHS Darwargai	Noor Zada	Sahib Zada	L/ Attend	NSR	4	SSC	23/09/1977	29/06/2000	29/06/2000	29/06/2000	319254	17201-6252182-7	0334-91457215	
224	GHS Manki Sharif	Anwar Sadat	Muhammad Islam	Behishti	NSR	4		20/01/1971	01/07/2000	01/07/2000	01/07/2000	310012	17201-2333807-9	0346-5664156	NE
225	GHS Manki Sharif	Haroon ur Rashid	Nisar Ahmad	Lab: Attenti	NSR	4	SSC	23/04/1976	01/07/2000	01/07/2000	01/07/2000	310611	17201-2095652-8	0332-4544375	
226	GPS Sahbat Koroona Kalange	Asad Ali	Noor M. Muhammad	Chowkidar	NSR	3	BA PTC	05/02/1981	25/01/2001	25/01/2001	25/01/2001	493937	17201-6298035-9	0344-4342669	
227	GHS Kohi	Jameel Badshah	Gul Badshah	Chowkidar	NSR	4		20/02/1983	21/02/2001	21/02/2001	21/02/2001	317689	17201-6762602-7	0302-5505516	NE
228	GPS Dara Banda No 1	Shehzad Khan	Haider A	Chowkidar	NSR	2		05/01/1983	16/04/2001	16/04/2001		00505917	17201-7128924-7	0345-9315420	NE
229	GPS Sahbat Koroona	Asad Ali	Noor Muhammad	Chowkidar	NSR	4	B.A	05/02/1983	25/04/2001	25/04/2001	25/04/2001			3444342669	
330	GPS Kheshgi Pavan No:1	Nasir Khan	Abad Khan	Chowkidar	NSR	4		31/12/1981	25/04/2001			00497412	17201-9240878-7	0344-8656784	NE
331	GHS Roshakai	Zia Ur Rahman	Gul Mus	Chowkidar	NSR	3	FA	24/05/1983	31/05/2001	31/05/2001	31/05/2001	317666	17201-4703499-3	0314-9445110	
332	GPS No3 Spin khak	Mukhlis haidar	Khan Ihsan	Chowkidar	NSR	4		28/12/1980	30/06/2001	30/06/2001		341308	17201-7109715-1	03145314189	NE
333	GHS Banda Sheikh Ismail	Naveed Khan	Liaqat Ali	Behishti	NSR	4	SSC	25/03/1983	01/12/2002	01/12/2002	01/12/2002	348686	17201-0682943-9	0311-56800092	
334	GHS Kotli Sole Khano	Kifayat Hussain	Afroz gul	L/ Attend	NSR	4		28/05/1986	28/03/2003	28/03/2003	28/03/2003	135007	17201-7215524-1	0300-5853725	NE
335	GHS ZKKS	Manzoor Ahmad	Speen Gul	Behishti	NSR	4		02/01/1982	01/07/2003	01/07/2003	01/07/2003				NE
336	GPS TANGI KHATTAK NO.2	Noor Parast	Abdul Mutalib	Chowkidar	NSR			01/07/1965	20-1-2004	21-1-2004	21-1-2004	354044	17201-86599469	0334-8325895	NE
337	GHS Zakhi Qabriston	Wali Khan	Rahmat Gul	Behishti	NSR	4		15/04/1980	01/03/2004	01/03/2004	01/03/2004	323212	17201-2936966-7	0302-5990504	NE
338	GHS Mughalki	Zafar Ali Khan	Guldar Khan	Chowkidar	NSR	3		01/04/1980	01/03/2004	01/03/2004	01/03/2004				NE
339	GHS No: 1 Nawshera Cantt	Ihsan Ul Haq	Irfan ul Haq	Naib Qasid	NSR	4	M.A M.Ed	15/04/1986	30/04/2004	30/04/2004	30/04/2004			300-5770919	
340	GHS Mian Ezzo Nawhera	Shah Hussain	Ghulam Muhammad	Sweeper	NSR	4		01/01/1963	01/09/2004	01/09/2004				0315-8778369	
341	GPS KHAISARI	Gul Zada	Khan zada	Chowkidar	NSR		BA/PTC	30/01/1982	11/11/2004	22-11-2004	22-11-2004	142043	17201-210820-9	0315-5047948	
342	GPS Pashtoon Garhi	Akbar Hussain	Fazla Akbar	Chowkidar	NSR	4	SSC	02/02/1977	22/11/2004	22/11/2004		142051	17201-8376173-1	0310-8340955	
343	GPS Pashtoon Ghari	Akbar Hussain	Fazli Akbar	Chowkidar	NSR	4	SSC	02/02/1977	22/11/2004	22/11/2004	22/11/2004			3108340955	
344	GPS Risalpur No:2	Mujahid Ali	Tilla Muhammad	Chowkidar	NSR	4	BA, PTC	15/02/1986	13/05/2005	14/05/2005		004787	17201-4682962-5	0343-9654804	
345	GPS Mir Ahmad Koroona	Mohammad Sabir	Sher Zada	Chowkidar	NSR	4		12/02/1981	30/06/2005			00500090	17101-6348909-5	0345-9064294	NE
346	GMS Pabbi	Khair ul Basher	Aamir Zada	Sweeper	NSR	3		05/02/1986	03/09/2005	03/09/2005	03/09/2005	48843	17201-6817440-3	0333-9092985	NE
347	GMS Kishiti Pul	Lutfur Rehman	Muhammad Anwar	Naib Qasid	NSR	4		11/12/1971	24/12/2005	24/12/2005	24/12/2005	338282	17201-2185131-3	0321-9746763	NE
348	GPS ZIARAT KAKA SAHIB NO.3	Iftikhar Ali Shah	Muhammad nabi	Chowkidar	NSR		SSC	10/04/1982	10/02/2006	10/03/2006	10/03/2006	335859	17201-5922749-5	345-9326932	
349	GPS Barhti Banda	Maqsood Ahmad	Sajdar Khan	Chowkidar	NSR	4	SSC	05/02/1986	21/02/2006	21/02/2006	21/02/2006				
350	GHS Manki Sharif	Muhammad Imtiaz	Muhammad Ilyas	Chowkidar	NSR	4		06/10/1979	14/03/2006	15/03/2006	15/03/2006	310013	17201-7503624-5	0306-5702434	NE
351	GPS No2 Shabara	Khira Khan	Nawsherwan	Chowkidar	NSR	3	Middle	01/01/1980	25/03/2006	25/03/2006		345481	17201-2307919-3	3159369762	NE
352	GPS Rahim Ullah Koroona	Mohammad Kamran	Rahman Ullah	Chowkidar	NSR	4	SSC	17/02/1979	01/06/2006	01/06/2006		00341671	17201-2153625-7	0321-2764450	
353	GMS Amon Garh	Muhammad Israil	Muhammad Ismail Khan	N/Qasid	NSR	4		08/02/1978	15/08/2006	15/08/2006	15/08/2006	377034	17201-9620175-9	0313-5530135	NE
354	GPS Balu	Nabi Amin	Rooh-ul-Amin	Chowkidar	NSR	4	SSC	19/04/1988	21/09/2006	21/09/2006	21/09/2006				
355	GHS Afrida Killi	Shamshad Khan	Sardar Khan	Chowkidar	NSR	3		11/02/1962	21/09/2006	21/09/2006	21/09/2006	338281	17201-2208827-3	0345-8310893	NE
356	GPS Balu	Nabi Amin	Rooh-ul-Amin	Chowkidar	NSR	4	BA	19/04/1988	21/09/2006	22/09/2006		478747	17201-2072226-7	0313-9686287	
357	GHS Hamza Rashaka	Fakhar e Alam	Rustum Khan	Naib Qasid	NSR	4	S.Sc	01/02/1979	21/09/2006	04/10/2006	04/10/2006	349256	17201-2223760-9	0313-9635188	
358	GHS Hamza Rashaka	Ikrum Ullah	Ghufraan	Sweeper	NSR	4	S.Sc	01/02/1983	21/09/2006	04/10/2006	04/10/2006	349250	17201-2160282-3	0340-1944862	
359	GPS Tandail Koroona	Shahbeer Ahmad	Sharif Uddin	Chowkidar	NSR	4		15/03/1988	21/09/2006				17201-9718278-7		NE
360	GPS Zao banda	Awal gul	Malook Khan	Chowkidar	NSR	4		01/07/1973	22/09/2006	23/09/2006		336971	17201-1181327-3	3345887684	NE
361	GPS No 2 Ali Baig	Ronhul Amin	Faqir Khan	Chowkidar	NSR	4		09/03/1969	22/09/2006	23/09/2006		338968	17201-4464902-3	0333-9301707	NE
362	GPS Nawshera Kalan No:4	Muhammad Shoib	Muhammad Amin	Chowkidar	NSR	3	BA, PTC	02/02/1985	29/09/2006	29/09/2006		478775	17201-9076801-1	0335-5598473	
363	GHS Mian Ezzo Nawhera	Rawoiz Khan	Muhammad Ali Khan	Lab: Attendant	NSR	4	FA	03/04/1976	03/10/2006	03/10/2006				0300-3945728	
364	GHS Mian Ezzo Nawhera	Rasool Khan	Shamas Khan	Chowkidar	NSR	4	SSC	12/03/1976	04/10/2006	04/10/2006				0333-9035589	
365	GHS Spin Kani Khurd	Yasir Sher	Soja wal sher	Sweeper	NSR	3	SSC	11/04/1981	06/10/2006	06/10/2006	06/10/2006	349259	17201-2313124-3	0343-9138559	
366	GHS Wazir Ghari	Khalid Muhammad	Farid Ullah	Chowkidar	NSR	4	SSC	21/03/1986	18/10/2006	18/10/2006	18/10/2006			0321-5308840	
367	GPS Risalpur No:2	Adnan Ali	Liaqat Ali	Chowkidar	NSR	3		16/06/1988	01/11/2006			00478753	17201-1946188-9	0333-9047302	NE
368	GHS ZKKS	Islam Jan	Abdullah Jan	N/Qasid	NSR	4	BA	01/05/1973	04/12/2006	05/12/2006	05/12/2006				

3	GHS Pir Saboq	Muhammad Ali	Israr ud Din	Chowkidar	NSR	4	inil	01/07/1961	19/02/1981	19/02/1981	19/02/1981	135228	17201-2270098-1	0313-9703172	NE
4	GSMHSHS Taru Jabba NSR	Wakeel Khan	Rasool Khan	Lab att:	NSR	4	NIL	12/12/1962	02/04/1981			133716	17201-5914131-9	0302-5955962	NE
369	GCMHS Akora Khattak	Momeen Gul	Tarif Gul	Chowkidar	NSR	4		01/04/1976	19/12/2006	21-012-2006	21-012-2006	356226	17201-2084260-7	0323-7694656	NE
370	GPS Ahmad Nagar No:1	Wajira Ali	Sabz Ali	Chowkidar	NSR	3	MA	01/04/1986	22/05/2007	22/05/2007		581561	17201-8456433-3	0346-2623725	
371	GPS Jabba Daud Zai	Taj Wali Shah	Safdar Shah	Chowkidar	NSR	4		18/01/1984	22/05/2007	23/05/2007		503822	17201-0970526-3	0307-8788842	NE
372	GPS Kotarpan No:1	Waqar Khan	Wali Khan	Chowkidar	NSR	4	nill	01/01/1989	22/05/2007	23/05/2007		00490670	17201-9552765-5	0321-9697380	NE
373	GPS Ghaffar Khan Koroonc	Auranzeb	Wisal Muhammad	Chowkidar	NSR	4	MIDDLE	11/04/1989	22/05/2007	01/03/2018		505970	17101-3471041-3	0301-8961760	NE
374	GPS Bara Banda No:4	Muhammad Ijaz	Muhammd Zubair	Chowkidar	NSR	4		15/04/1986	23/05/2007	23/05/2007		00490657		0306-577320	NE
375	GPS No 1 Kurvi	Muhammad Iqbal	Taj Malouk	Chowkidar	NSR	3	SSC	01/01/1971	23/05/2007	26-05-2007		556806	17201-2176955-3	0305-9719433	
376	GHS No.1 Nowshera Cantt	Muhammad Rafi	Kiramat shah	N/Q	Chitral	4		30/11/1974	18/02/2008	24/12/2008	24/12/2008	139398	15202-0808690-3	0334-8923774	NE
377	GPS DEHRI KATTI KHEL NO.1	Mian Muhammad Ayaz	Mian Muhammad Aslam	Chowkidar	Chitral			01/08/1970	28-05-2008	28-05-2008	28-05-2008	451842	17201-0351240-1	0336-9470869	NE
378	GSMWHS Pir Piai	Mussarat Shah	Syed Anwar Shah	Chowkidar	NSR	3	SSC	21/01/1982	14/01/2009	15/01/2009	15/01/2009	490231	17201-2181270-1	0307-8539425	
379	GPS No 1 Ali Shah	Fazal Taj	Fareed Ullah	Chowkidar	NSR	3		03/12/1988	02/02/2009	02/02/2009		478862	17201-6710510-5	0306-9299418	NE
380	GPS Khesgi Payan No.1	Mohammad Nazir	Umer Khan	Chowkidar	NSR	3	NILL	01/08/1981	11/02/2009	12/02/2009		00490192	17201-8250360-5	0301-5542945	NE
381	GPS PIR PIAI NO.1	Ismail Khan	Sikandar Shah	Chowkidar	NSR			01/01/1991	10/05/2009	10/06/2009	10/06/2009	490664	17201-6878186-4	310-0938071	NE
382	GPS AZA KHEL BALA NO.1	Said Rehman	Sher Rehman	Chowkidar	NSR			03/12/1982	10/05/2009	13/10/2009	13/10/2009	500100	17201-8622214-7	0316-9050650	NE
383	GPS Mari zang	Muhammad yousaf	Nasrull Wahab	Chowkidar	NSR	3		14/03/1965	02/07/2009	02/07/2009		459125	17201-3616904-3	nill	NE
384	GPS Kotli Saleh khana	Wajid havat	Guncha gul	Chowkidar	NSR	3		24/11/1977	07/07/2009	07/07/2009		454097	17201-2296725-5	Nill	NE
385	GPS Aurang Abad	Sifat Ullah	Shareef Ullah	Chowkidar	NSR	3		20/12/1968	14/07/2009	15/07/2009		527735	17201-1826981-1	0317-1967974	NE
386	GSMWHS Pir Piai	Ijaz Ahmad	Sartaj Ullah	Chowkidar	NSR	3		01/08/1979	14/07/2009	18/07/2009	18/07/2009	459128	17201-2296664-9	346-8494034	NE
387	GPS No 2 Khudrezai	Saddam Hussain	Mumtaz Hussain	Chowkidar	NSR	3	MA	01/01/1990	15/07/2009	15/07/2009		454100	17201-9301116-9	0300-5312090	
388	GPS No:2 Khudrozi	Saddam Hussain	Mumtaz Hussain	Chowkidar	NSR	4	B.A	01/01/1990	15/07/2009	15/07/2009	15/07/2009				
389	GPS Gandheri Bala	Shakir Ullah	Mutahir shah	Chowkidar	NSR	3	MIDDLE	11/04/1987	15/07/2009	15/07/2009		00457537	172013855901-3	0311-9053503	NE
390	GHS No.1 Nowshera Cantt	Sher Azam Khan	Abdul Azam Khan	Work Shop Att	NSR	3	BA	03/03/1990	15/07/2009	15/07/2009	15/07/2009	458514	17201-7746567-1	0346-8144703	
391	GHS Inzari	Shaukat Hussain	Aman Ullah	Behishti	NSR	3	FA	31/12/1984	15/07/2009	15/07/2009	15/07/2009	421960	17201-8727926-9	0307-5708837	
392	GPS No 1 Banda Nabi	Allah Yar	Rooh Ul Amin	Chowkidar	NSR	3		01/07/1966	17/07/2009	17/07/2009		459024	17201-7318038-5	0312-8552247	NE
393	GHS Kotli Sale Khana	Akhtar Din	Hasan Din	Behishti	NSR	1		01/01/1967	21/07/2009	21/07/2009	21/07/2009	484740	17201-2118933-1	0301-8911357	NE
394	GPS Bara Banda No:1	A:shad Ali	Sher Zada	Chowkidar	NSR	3		01/01/1979	21/07/2009	21/07/2009		00493947	17201-2193120-7	0334-8920599	NE
395	GPS Spin Kani	Imtiaz Ahmad	Abdul Hanif	Chowkidar	NSR	3	SSC	05/03/1979	21/07/2009	21/07/2009		00505836	17201-2306695-5	0312-7476711	
396	GMS Gul Bahar Shaidu	Muhammad Raiz	Muhammad Saeed	Sweeper	NSR	3	FA	02/03/1970	21/07/2009	21/07/2009	21/07/2009	497670	17201-2305134-5	0312-8036135	
397	GHS Kotli Sale Khana	Naeem Ud Din	Ahmad Din	Sweeper	NSR	1		10/10/1968	21/07/2009	21/07/2009	21/07/2009	484748	17201-5105876-1	0315-8232362	NE
398	GHS Ali Baig	Ibrar Hussain	Muhammad Khan	N/Q	NSR	3		01/01/1969	22/07/2009	22/07/2009	22/07/2009	457696	17301-6706944-1	0315-1954010	NE
399	GHS No.1 Nowshera Cantt	Naeem Khan	Isrofil	Mali	NSR	3		02/03/1974	22/07/2009	22/07/2009	22/07/2009	457432	17201-2314454-7	0346-5973997	NE

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

Appeal No. 304 /2014

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04/3/2014

Mr. Abdur Rahim, Class-IV,  
Government Higher Secondary School,  
Khweshgi Payan, Nowshera.

**APPELLANT**

**VERSUS**

1. The Director Education E&SE KPK Peshawar.
2. The EDO (E&SE), Nowshera.
3. The Secretary, Finance Department, Khyber Pakhtunkhwa,  
Peshawar.

**RESPONDENTS**

.....

APPEAL UNDER SECTION-4 OF THE KPK SERVICE TRIBUNAL ACT 1974 FOR DIRECTION THE RESPONDENT TO CONSIDER THE APPELLANT FOR PROMOTION TO THE POST OF JUNIOR CLERK UNDER 33% FIXED QUOTA BY THE GOVERNMENT AND AGAINST NOT TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT.

.....

**PRAYER:**

THAT ON ACCEPTANCE OF THIS APPEAL, THE RESPONDENTS MAY BE DIRECTED TO CONSIDER THE APPELLANT FOR PROMOTION TO THE POST OF JUNIOR CLERK UNDER 33% QUOTA FIXED BY THE GOVERNMENT FROM HIS DUE DATE/AVAILABILITY OF FUND WITH ALL CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

**RESPECTFULLY SHEWETH:**

1. That the appellant joined the respondent department on 19.10.1992. The appellant more than 21 years service with good record through out at his credit. Copy of Appointment Order is attached as Annexure-A.

TESTED

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR.

Appeal No. \_\_\_\_\_ of \_\_\_\_\_ 15014

Mr. Abdul Rahim, Class-IV,  
Government Higher Secondary School,  
Khweshgi Payan, Nowshera.

APPELLANT

VERSUS

1. The Director Education ERSE KPK Peshawar.
2. The EDO (ERSE), Nowshera.
3. The Secretary, Finance Department, Khyber Pakhtunkhwa, Peshawar.

RESPONDENTS

APPEAL UNDER SECTION-4 OF THE KPK SERVICE TRIBUNAL ACT 1974 FOR DIRECTION THE RESPONDENT TO CONSIDER THE APPELLANT FOR PROMOTION TO THE POST OF JUNIOR CLERK UNDER 33% FIXED QUOTA BY THE GOVERNMENT AND AGAINST NOT TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT.

THAT ON ACCEPTANCE OF THIS APPEAL THE RESPONDENTS MAY BE DIRECTED TO CONSIDER THE APPELLANT FOR PROMOTION TO THE POST OF JUNIOR CLERK UNDER 33% QUOTA FIXED BY THE GOVERNMENT FROM HIS DUE DATE/AVAILABILITY OF FUND WITH ALL CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

PRAYER:

RESPECTFULLY SHEWETH:

That the appellant joined the respondent department on 19.10.1992. The appellant more than 21 years service with good record through out at his credit. Copy of Appointment Order is attached as Annexure-A.

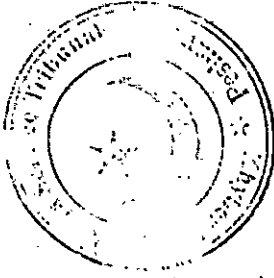
27.10.2017

Appeal No. 304/2014, Abdus Rahim vs Govt

6

Counsel for the appellant and Mr. Kabeerullah Khattak, Addl.

Advocate General alongwith Hameedullah, Assistant Director of the respondents present.



2. Both the learned counsel for the parties agreed on the point that if this appeal is disposed of in the terms that the department shall calculate the quota of promotees in accordance with the prevalent rules at different stages and then the department shall consider only those appellants and others who are eligible and fit in accordance with the calculation of the department.

3. In view of the above, the respondents are directed that they should calculate the quota of promotees in accordance with the prevalent rules at different stages and then they should consider all those who are eligible and fit for promotion at different stages.

4. The appeal is disposed of in the above terms. Parties are left to bear their own costs. File be consigned to the record room.

*SD/*  
(Ahmad Hassan)  
Member

*SD/*  
(Niaz Muhammad Khan)  
Chairman

**ANNOUNCED**  
27.10.2017

Certified  
True copy  
*[Signature]*  
Secretary

Date of Presentation of Application 13-11-17  
Name of Party 800  
Copying fee 6  
Urgent 6  
Total 6  
No. of Pages 1  
Date of Completion of Case 21-11-17  
Date of Delivery of Copy 21-11-17

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

(F)

C.O.C No. \_\_\_\_\_/2018

In

Appeal No. 304/2014

Mr. Abdur Rahim, Class-IV, Government Higher Secondary School, Khweshgi Payan, Tehsil and District Nowshera.....(Petitioner)

**VERSUS**

1. Mr. Rafiq Khattak, Director Education, Elementary and Sedentary Education Khyber Pakhtunkhwa, Peshawar.
2. Mr. Fayaz Hussain, District Education Officer, Nowshera.....(Respondents)

**APPLICATION FOR INITIATING CONTEMPT**  
**OF COURT PROCEEDING AGAINST THE**  
**RESPONDENTS WHO REFUSED TO**  
**IMPLEMENT THE ORDER DATED**  
**27/10/2017 ON APPEAL NO. 304/2014 OF**  
**THIS HON'BLE TRIBUNAL, WITHOUT**  
**PREPARING PROMOTION LIST STAGE**  
**WISE AND CALCULATION ON 33% QUOTA**  
**OF CLASS-IV SINCE FIRST STAGE OF**  
**SERVICE.**

C.O.C No. \_\_\_\_\_/2018

In

Appeal No. 304/2014

Mr. Abdur Rahim, Class-IV, Government Higher Secondary  
School, Khweshgi Pagan, Tessa, District  
Nowshera.....(Petitioner)

**VERSUS**

1. Mr. Raif Khattak, Director Education, Birmahary and  
Secondary Education Khayber Pakhtunkhwa, Peshawar.  
2. Mr. Fayaz Hussain, District Education Officer,  
Nowshera.....(Respondent)

APPLICATION FOR INITIATING CONTEMPT  
OF COURT PROCEEDING AGAINST THE  
RESPONDENT WHO REFUSED TO  
IMPLEMENT THE ORDER DATED  
27/10/2017 ON APPEAL NO. 304/2014 OF  
THIS HON'BLE TRIBUNAL. WITHOUT  
PREPARING PROMOTION LIST STAGE  
WISE AND CALCULATION ON 33% QUOTA  
OF CLASS-IV SINCE FIRST STAGE OF  
SERVICE.

Respectfully Sheweth:

Brief Facts of the petition are as under:

1. That petitioner has filed an appeal before this Hon'ble Tribunal for promotion to the upper class from Class-IV since 1992-93 and upto date of the appellant in his service appeal instituted on 04/03/2014 which was remanded to the respondents for calculating 33% quota at different stages dated 27/10/2017. (Copy of judgment dated 27/10/2017 is attached as annexure "A").
2. That the petitioner filed an application along with judgment which was under process of the respondents who finally refused to implement the order/ judgment of this Hon'ble Tribunal. (Copy of application for implementation is attached as annexure "B").
3. That petitioner was compelled to visit numerous offices for perusal of his case, but in vain.



(F)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

E.P No. 42/2018

in

Appeal No. 304/2014

Abdur Rahim.....Appellant.

VERSUS

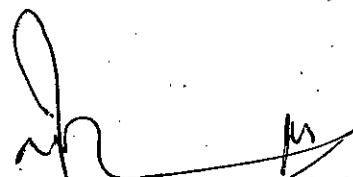
Govt & Others..... Respondents

**IMPLEMENTATION REPORT ON BEHALF OF RESPONDENTS**

Respectively Sheweth

1. That the above title case is sub-judice before this Honorable Service Tribunal and is fixed for hearing on 18-12-2018.
2. That in compliance of the judgment date 27/10/2017 of this Honorable Tribunal the promotion of the deserving official has been issued by the respondent but the appellant was not entitled as per promotion criteria (seniority cum fitness).
3. That the respondent complied with the Order of this Honorable Tribunal and the appellant not fulfilled the criteria therefore, he was not promoted.

The implementation report is submitted please.

  
District Education Officer (M)  
Nowshera

**VAKALAT NAMA**

NO. 761 /2020

IN THE COURT OF KP SERVICE TRIBUNAL PESHAWAR

Abdur Rahim

(Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

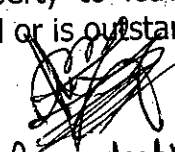
Education Department & others (Respondent)  
(Defendant)

I/We, Respondent No.4, Respondent No.5, Respondent No.6





Do hereby appoint and constitute **M. Asif Yousafzai, Advocate Supreme Court Peshawar and Syed Noman Ali Bukhari Advocate High Court**, 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

  
Respondent No.4, Respondent No.5, Respondent No.6  
(CLIENT)

ACCEPTED

  
**M. ASIF YOUSAFZAI**  
Advocate Supreme Court Peshawar.  
&   
**TAIMUR ALI KHAN**  
Advocate High Court, Peshawar  
&   
**SYED NOMAN ALI BUKHARI**  
Advocate High Court  
&   
**SHAHKAR KHAN YOUSAFZAI**  
Advocate.

**OFFICE:**

Room # FR-8, 4<sup>th</sup> Floor,  
Bilour Plaza, Peshawar,  
Cantt: Peshawar