

**BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR.**

Service appeal No. 559 of 2022

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 3797

Dated 24/2/2023  
(Appellant)

*Mehboob Ur Rehman*

**VERSUS**

*Director Education (E & SE) & Others*

(Respondents).

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Respondent No. 2.

District Education Officer

(Male) Karak

**BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR.**

Service appeal No. 559 of 2022

*Mehboob Ur Rehman*

*(Appellant)*

**VERSUS**

*Govt: of KPK & Others*

*(Respondents)*

**Para Wise Written Reply on behalf of Respondent No. 1, 2, 3 &4**

Respectfully Sheweth

**Preliminary Objections.**

1. That appellant has got no cause of action to file the instant service appeal.
2. That the above titled service appeal is wrong, incorrect and against the law & facts.
3. That the appellant is estopped to file the instant service appeal by his own conduct.
4. That the instant service appeal is not maintainable in its present form.
5. That the appellant has not come to this Honourable Tribunal with clean hands and concealed the facts.
6. That the instant service appeal is liable to be dismissed due to mis-joinder & non-joinder of necessary party.
7. That the instant service appeal is badly time barred and is liable to be dismissed in limine.
8. That no departmental appeal has been filed by the appellant which is required by law and service rules.

**Factual Objections**

1. Para No. 1 pertains to record.
2. Para No. 2 pertains to record.
3. Para No. 3 pertains to record.
4. Para No. 4 is incorrect. Further stated that the seniority has been revised and prepared on the basis of merit list mentioned in the appointment order. He will be promoted on his own turn according to seniority list. The appellant has not been suffered due to entry of appointment date in his service book, rather he is not due for promotion at this stage. He is at S.No.116 in seniority list and will be promoted at his own turn. (Updated Seniority list attached as Annex 'A').
5. Reply of Para No. 5 pertains to record with further explanation that the appellant filed application for correction at very belated time, however entry of date in service book has no concern with seniority.
6. Reply of Para No. 6 is that the matter has been resolved and uniform policy of seniority on the basis of merit mentioned in the appointment

- order has been applied and the appellant has been placed at his right place in the seniority list.
7. Para No. 7 is that uniform policy of merit list has been applied and the appellant has been placed at his right place.
  8. Reply of Para 8 is that seniority has been updated and revised according to merit list and the appellant has been placed at S.No. 116 and will be promoted as per seniority list.
  9. Para No. 9 is incorrect with further explanation that seniority is prepared on the basis of merit list mentioned in the appointment order and he will be promoted on his own turn as per seniority list.

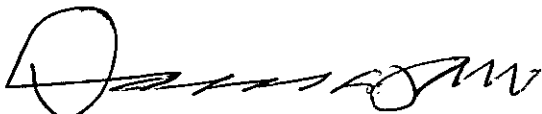
**Objection on Grounds.**

- A. Ground "A" is incorrect and wrong hence denied. Respondent No. 2 has rightly updated and issued seniority list as per available official record. The appellant is not recommended for promotion because he is low in seniority.
- B. Ground "B" is incorrect and wrong hence denied as replied above.
- C. Ground "C" is incorrect. As stated above that the seniority is prepared according to merit mentioned in the appointment order. In the seniority list he is junior and hence not recommended for promotion at this stage. He will be promoted at his own turn according to seniority.
- D. Ground "D" is incorrect and wrong. He has not suffered due to wrong entry in his service book rather he has low and is junior to his other colleagues.
- E. Ground "E" is incorrect and wrong. As replied in above paras.
- F. The respondents seek leave to raise additional grounds at the time of arguments.

**Prayer**

It is therefore requested that on acceptance of parawise reply, the appeal of the appellant may very graciously be dismissed.

Dated: - 24 / 02 / 23



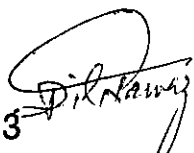
**Respondent No.1.**

**Director E&SED  
Khyber Pakhtunkhwa Peshawar**

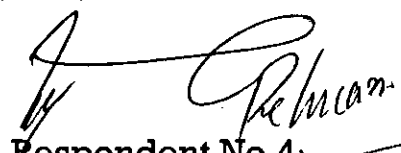


**Respondent No. 2**

**District Education Officer  
(Male) Karak.**



**Respondent No.3**  
**Sub Divisional Education Officer**  
B.D. Shah Karak



**Respondent No.4.**  
**Superintendent DEO (M) Karak**

New Sen: No	Old Sen: No	Name	Fathers Name	School Name	Union Council	Acad: Qual:	C/T	BEd/ M.Ed	D/O Birth	D/O 1 <sup>st</sup> Apptt in Edu:Dept (UT/out Disstt:)	D/of T/ overcharge in the pres: Distt.	PTC Result/ Declaration/ Cretaria/ Total Aggregate	D/of Apptt:/ Prom: ie traing teacher/ entry into Distt/Same adv: Distt: merit order	Present Desig:	Remarks
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## OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KARAK

## FINAL SENIORITY LIST OF SPST STOOD ON 08.02.2023. (Page-01)

1	8	Sakhi Sarwar	Muhammad Noor	GPS Dhand Edal Khel	Sabir Abad	BA/. PTC			09-Apr-65				29-Oct-83	SPST	
2	28	Muhammad Rauf	Aqlim Khan	GPS Jehangeri	Jahangeri	FA.PTC			10-May-65	09-01-85		01-11-86	11-Jan-86	SPST	
3	70	Mohammad Rafiq	Mir Ajab Khan	GPS Mona Khel	G.G.Khel	FA			01-Jan-66			0	09-Sep-89	SPST	
4	177	Abdul Basir	Abdul Janan	GPS Bari Khwar	Karak North	BA.PTC	CT		20-Apr-70	09-02-89		29-04-1993	29-Apr-93	SPST	
5	184	M. Iftikhar Khan	M. Rafique Amin	GPS Ghundi Shahbaz Khan	Sabir Abad	BA			05-May-72			0	19-May-94	SPST	
6	185	Rahman Gul	Khani Gul	GPS Mohammad Yari	S.G.Khel	BA			05-Nov-70			0	24-May-94	SPST	
7	207	Noor Jamal	Sher Nawaz	GPS Nara Banda	T/Nasrati	MA	CT		22-Oct-65			0	02-Sep-95	SPST	
8	240	Shaheed Nawaz	Sher Nawaz	GPS Paki Gudi Khel Niaz	S.G.Khel	FA			15-Mar-68			0	02-Sep-96	SPST	
9	262	Kiramat Ullah	Ghazi Muhammad	GPS Kanda Baji Khel	Mitha Khel	FA.PTC			01-Mar-76			0	07-Aug-97	SPST	
10	326	Shahid Farooq	Pazeer Gul	GPS Dalan Sheikhan	J.I.Khel	FA			18-Mar-77			0	05-Apr-04	SPST	
11	367	Said Ali Shah	Syed Bad Shah	GPS Sher Khan	Sabir Abad	BA/PTC			25-Jan-81			0	10-Mar-06	SPST	
12	389	Amir Rahim	Maula Dad	GPS Laki Banda	Mitha Khel	BA.PTC			04-Jan-77			0	01-Apr-09	SPST	
13	390	Haider Zaman	Zarnab Gul	GPS Zebi Karak	Mitha Khel	MA P.Sc:	C.T	B.Ed	10-May-77			0	01-Apr-09	SPST	
14	391	Shaukat Iqbal	Zahir Badshah	GPS Bari Khwar	Karak	MA. Add	CT	B.Ed	07-May-82			0	01-Apr-09	SPST	
15	395	Sajid Iqbal	Abdul Tameez	GPS Town Committee	Karak North	MA.PTC			01-Jan-82			0	02-Apr-09	SPST	
16	400	Jamshid Wali	Izat Wali	GPS Noshpa Banda	Bahadar Khel	MA.PTC		B.Ed M.Ed	26-Apr-86			0	02-Apr-09	SPST	
17	402	Muhammad Khalid	Sardar Ali	GPS Zeri Gul Banda	Sabir Abad	BA.PTC		B.Ed	05-Aug-87			0	02-Apr-09	SPST	
18	403	Muhammad Ajmal	M.Ghani Shah	GPS D.Siraj Khel	W.Siraj Khel	MA.PTC	CT	BED, Med	07-Feb-88			0	02-Apr-09	SPST	
19	460	Muhammad Yahya	Muhammad Jamil	GPS Gurguri No.1	Gurguri	BA.PTC			20-Nov-85			0	17-Jan-11	SPST	
20	565	Zubair Younas	Muhammad Younas	GPS Bari Khwar	N.Karak	Bio		BED	01-May-87			62.15	24-Apr-12	SPST	
21	564	M. Altaf Roshan	Mirdad Khan	GPS Sarki Lawagher	Siraj Khel	MSC.PTC	CT	M.ED	15-Apr-87			60.92	24-Apr-12	SPST	
22	485	Imranullah Khan	Amal Shireen	GPS Tarki Khel	GMK.khel	MA/PTC	CT		02-Jul-87			59.68	24-Apr-12	SPST	
23	487	Mohd: Hamid Raza	Mohd: Wakeel Khan	GPS Billan kalla # 2	Jandri	(GEOLOGY		M.ED	12-Mar-91			59.13	24-Apr-12	SPST	
24	606	Wali ullah	Asmat Ullah	GPS Ghedara Banda	Jandri	MSC.	CT	M.Ed	20-Aug-84			58.17	24-Apr-12	SPST	
25	489	Shahid Akbar	Attar Khan	GPS Shahidan Banda	Mianki	Chem	CT	B.Ed	13-Dec-78			58.15	24-Apr-12	SPST	
26	490	Zahir Iqbal	Mumtaz Ali Shah	GPS S.Lawaghar No #1	W.Siraj Khel	BS. Phy	CT	MED	02-Feb-86			57.9	24-Apr-12	SPST	
27	493	Arshad Mehmood	Sultan Husain	GPS Sarwar Jan Kor	Mianki	PTC	CT	BED	05-Dec-80			57.33	24-Apr-12	SPST	
28	492	Shakir Ullah	Wiyal Muhammad	GPS Sharbat Khan Koroona	N.Karak	MSC Math	CT		01-May-86			56.96	24-Apr-12	SPST	
29	494	Mohsin-u-Din	Misbah-u-Din	GPS Dabb	EskChontra	BSC Bio			12-Apr-78			56.8	24-Apr-12	SPST	
30	590	Sajid Akram	Akram Khan	GPS Shawa Nasrati	Mianki	PTC		BED	02-Feb-84			56.76	24-Apr-12	SPST	
31	495	Rozman Ullah	Naik Kamal	GPS Lal Khel Rehmat Abad	N.Karak	MPhil.PTC	CT	BED,MED	08-Mar-84			56.76	24-Apr-12	SPST	
32	595	Hamayun ur Rashid	Muhammad Riaz	GPS Sabir Abad No.1	Sabir Abad	MA	CT.	B.ED	25-Mar-82			56.73	24-Apr-12	SPST	

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33	496	Kaleem Ullah	Fauj Ali khan	GPS Gardi Banda	Jahangiri	BCS.PTC	CT	BEDMED	01-May-88			56.72	24-Apr-12	SPST	
34	497	Munawar Tufail	Noor Saeed	GPS Bari Khwar.	Karak North	BSC Phy	CT	BED	01-Apr-89			56.36	24-Apr-12	SPST	
35	589	Salim Ullah	M Ismaeel	GPS Aowzi Banda	Chokara	MA.PTC		BED	26-Apr-88			56.18	24-Apr-12	SPST	
36	498	Wali u Rehman	Izzat Khan	GPS Dabb	EskChontra	BSc Bio			08-May-84			56.16	24-Apr-12	SPST	
37	597	Wajid ullah	Ikhtiar Khan	GPS Serat Khel	Jandri	B.A.PTC			10-Apr-89			56.12	24-Apr-12	SPST	
38	499	Shaheed Zaman	Shad Muhammad	GPS Algadi Karak	S.Karak	MA.PTC	CT	BEDMED	01-Jan-82			56.11	24-Apr-12	SPST	
39	500	Zafar Mehmood	Amir Zada	GPS Zeri Gul Banda	Sabir Abad	MA	CT	B.Ed	24-Oct-88			56.02	24-Apr-12	SPST	
40	501	Tahir Islam	Amir Hamza	GPS Begu Khel Bala	EskChontra	MA.PTC	CT	B.Ed/M.ed	15-May-89			56.01	24-Apr-12	SPST	
41	502	Khalid Usman	Mast Amin	GPS Ashkai Ali Khel	Sabir Abad	B.Sc.PTC		BED	08-Sep-89			55.13	24-Apr-12	SPST	
42	504	Sana Ullah	Afsar Khan	GPS Shanki Nasrti	T/Nasrati	BSc.Math	CT	BED	03-Mar-84			55.07	24-Apr-12	SPST	
43	505	Mohammad Sajid	Alizat Khan	GPS W.Siraj khel	W.Siraj Khel	C		BED	02-Mar-86			54.94	24-Apr-12	SPST	
44	599	Sami Ullah	Umar Badshah	GPS Kamali Banda	Latamber	MA.PTC	CT	BED	20-Apr-84			54.73	24-Apr-12	SPST	
45	596	Afsar Rehman	Aqleem Khan	GPS Kabir Killa	Sabir Abad	BA.PTC	CT	B.Ed	01-Oct-87			54.71	24-Apr-12	SPST	
46	506	Israr Khan	Zarbat Khan	GPS Zarki Nasrati	T/Nasrati	MSC.PTC	CT	BED.MED	01-Mar-82			54.54	24-Apr-12	SPST	
47	507	Ghafoor ur Rehman	Kithab Gul	GPS Zaid Gul Koroona	Sabir Abad	MA.PTC	CT	BED	25-Aug-87			54.51	24-Apr-12	SPST	
48	508	Muhamamd Umar	Sardar Ali Khan	GPS Ghundi Kalla	Chokara	MA.PTC	CT	BED.MED	30-Jul-83			54.41	24-Apr-12	SPST	
49	509	Azmat Ali Khan	Zaid Ali Khan	GPS janderi	Jandri	B.A.PTC	CT		04-Mar-81			54.39	24-Apr-12	SPST	
50	607	Syed ur Rehman	Musharaf Khan	GPS Koh-e- Maidan	S.G.khel	MA	CT	B.Ed	01-Mar-90			54.37	25-Apr-12	SPST	
51	510	Khan Wali	Gul Makhan	GPS Kurd Sharif	Palosa Sar	M.A.PTC	CT	BED.MED	10-Mar-84			54.24	24-Apr-12	SPST	
52	512	Imran Ullah	Sarfaraz Khan	GPS Dabli Lawagher	Mitha Khel	B.A.PTC			15-Sep-90			54.2	24-Apr-12	SPST	
53	511	Zafar Hayat	Umer Hayat	GPS Gul Khan Abad	Jehangeri	BSc. PTC		B.Ed	18-Nov-83	25-Apr-12		53.94	25-Apr-12	SPST	
54	513	Ijaz Ahmad	Mashader	GPS Tor Dhand	S.Karak	M.A.PTC			15-Mar-79			53.71	24-Apr-12	SPST	
55	516	Adil Rehman	Khalil Rehman	GPS Sabir Abad No. 1	Sabir Abad	B.com	CT		30-Sep-92			53.71	24-Apr-12	SPST	
56	517	Mishkat ullah	Abdullah Khan	GPS Awazi Banda	Chokara	MA Bscptc		Bed	01-Mar-80			53.33	24-Apr-12	SPST	
57	515	Muhammad Rehman	Gul Rafi	GPS Dabb Payan	Jandri	MA.PTC	CT	B.Ed	03-Mar-84			53.26	25-Apr-12	SPST	
58	518	Murad Ullah	Sarfaraz Khan	GPS Gardi Banda	Jehangeri	MSC.PTC	CT	BED	05-Sep-86			53.2	24-Apr-12	SPST	
59	520	Muhamad Riaz	Islam Gul	GPS Dhand Edal Khel	Sabir Abad	MA	CT	B.Ed	10-Feb-85			53.04	24-Apr-12	SPST	
60	521	Naqeeb Hussain	Muhammad Din	GPS Dagari Banda	T.Nasrati	MA			29-Nov-87			52.78	24-Apr-12	SPST	
61	522	Manzoor Ahmed	Abdul Khanan	GPS Jan Alam Koroona	Jandri	MA	DM	BED	20-Nov-88			52.74	24-Apr-12	SPST	
62	603	Muhammad Saboor	Mohd: Rasool	GPS Seri Khwa	Sabir Abad	B.A.PTC	CT		02-Apr-89			52.74	24-Apr-12	SPST	
63	604	Abdur Rauf	Mir Abas Khan	GPS D.Siraj khel	W.Siraj Khel	M.SC.PTC		BED.MED	04-Apr-86			52.72	24-Apr-12	SPST	
64	523	Abid Ullah	Mohd: Mumtaz	GPS Mitha Khel	Mitha Khel	M.A.PTC	CT	BEDMED	01-Oct-87			52.67	24-Apr-12	SPST	
65	524	Iftikhar Alam	Sahar Badshah	GPS Anar Banda	Bahader Khel	BSC.PTC	JDPE	BED	18-Sep-84			52.66	24-Apr-12	SPST	
66	525	Asmat Ullah	Lal Faraz	GPS Noora Killa	Sabir Abad	MA		B.EdM.Ed	31-Oct-86			52.55	24-Apr-12	SPST	

New Sen: No	Old Sen: No	Name	Fathers Name	School Name	Union Council	Acad: Qual:	CIT	BE/ M.Ed	D/O Birth	D/O 1 <sup>st</sup> Apptt in Edu:Dept (UT/out Disstt:)	D/of T/ overcharge in the pres: Distt.	PTC Result/ Declaration/ Cretaria/ Total Aggregate	D/of Apptt:/ Prom: ie traind teacher/ entry into Distt/Same adv: Distt: merit order	Present Desig:	Remarks
67	519	Kamran Ayaz	Hakim Nawaz Khan	GPS Mir Kalam	Jatta	MSC			11-Aug-85			52.47	25-Apr-12	SPST	
68	526	Amin Ullah	Sultan Zarin	GPS Shagi Lawagher	EskChontra	BSC.PTC	CT		06-Dec-82			52.23	24-Apr-12	SPST	
69	528	Muhammad Ijaz	Aman Ullah Khan	GPS Sardar Koroona	Mitha Khel	M.A.PTC	CT	BED	22-Aug-87			52.12	24-Apr-12	SPST	
70	529	Sajjid Usman	Misbah ud Din	GPS Palosa Kemanri	Palosa Sar	MA	CT	B.Ed	07-Nov-89			52.1	24-Apr-12	SPST	
71	605	Naqeeb ullah	Ayub Gul	GPS Sarki Lawagher No.1	W.Siraj Khel	MSc.PTC	CT	BED,MED	14-Mar-86			52.07	24-Apr-12	SPST	
72	676	Murtaza Khan	Mehrdil Khan	GPS Sharbat Khan Koroona	S.Karak	MA.PTC			03-Sep-85			51.94	24-Apr-12	SPST	
73	598	Amal Badshah	Naib Shah	GPS Dabli Lawagher #2	Mitha Khel	MA.PTC			17-Feb-81			51.9	24-Apr-12	SPST	
74	532	Akhter Javed	Satar Gul	GPS Dabb	EskChontra	M.A.PTC	CT	BEDMED	01-Sep-84			51.87	24-Apr-12	SPST	
75	533	Muzaffar Khan	Zafar Ali Khan	GPS Tarkha Koie Gharbi	Jandri	MA	CT	BED	01-Apr-79			51.64	24-Apr-12	SPST	
76	534	Wajid Rehman	Maqsood Ur Rehman	GPS Thur Dand	Karak South	BSc.PTC		BED	15-Apr-89			51.53	24-Apr-12	SPST	
77	535	Zia-ur-Rehman	Zar Pio Khan	GPS Tappi Karak	N.Karak	MA.PTC		BED	15-Feb-81			51.48	24-Apr-12	SPST	
78		Rahmat Ullah	Zaheer Bad Shah	GPS Bego Khel Payan	Jandari	MA	CT	B.Ed	15-Oct-83			51.22	24-Apr-12	spst	
79	592	Anwar Ullah	Awal Janan	GPS Ahmad Abad	Latamber	MA.PTC	CT	BEDMED	28-Dec-88			51.19	24-Apr-12	SPST	
80	536	Rahman Habib	Muhammad Habib	GPS Darsih Khel	Bahader Khel	MA.PTC	CT	BEDMED	01-Jan-82			51.16	24-Apr-12	SPST	
81	608	Arshad Iqbal	Luqman Shah	GPS Palosa Sar # 2	Palosa Sar	M.A.PTC	CT	B.Ed	15-Feb-79	24.04.2012		51.07	26-May-12	SPST	
82	537	Inayat Ullah	Maizullah	GPS Tarkha koi	Jandri	BSC.PTC	CT	BED	15-Sep-91			50.73	24-Apr-12	SPST	
83	539	Siraj Ullah	Misal Khan	GPS T.Nasrati 2	T.Nasrati	MSc.PTC		BEDMED	15-Mar-89			50.68	24-Apr-12	SPST	
84	541	Muhammad Waqar	Taj ali Khan	GPS Amberi Killa	Chokara	BSC.PTC	CT	B.Ed	01-Apr-89			50.66	24-Apr-12	SPST	
85	542	Munir Ahamad	Fareed Khan	GPS Saikot	W.A.Abad	MA.PTC	CT	B.ED	15-Mar-85			50.28	24-Apr-12	SPST	
86	543	Atta ur Rehman	Muhammad Jehan	GPS Darab kalla	Jandri	MA.PTC	CT	M.Ed	02-Jan-84			50.05	24-Apr-12	SPST	
87	544	Amjad Rehman	Mohd: Rehman	GPS Paloski	W.A.Abad	TC	CT	BED	02-Apr-86			49.99	24-Apr-12	SPST	
88	545	Kamran Naseer	Naseer Khan	GPS Khujaki Kalla	Jahangiri	MA.PTC	JDPE	BED	30-Mar-82			49.96	24-Apr-12	SPST	
89	546	Zahid Iqbal	Amir Khan	GPS Kabir Kalla	Sabir Abad	MA	CT	B.Ed	01-Mar-88			49.95	24-Apr-12	SPST	
90	734	Wajid Rasool	Muhammad Rasool	GPS Sarat Khel	Jandri	MA	CT	B.EdMED	03-Mar-86			49.69	24-Apr-12	SPST	
91	549	Habib ullah	Mir Abas Khan	GPS D.Siraj Khel	W.Siraj Khel	MA.PTC	CT	BEDMED	07-Dec-86			49.67	24-Apr-12	SPST	
92	550	Muhammad farooq	Taj Ali Khan	GPS Dabaki Banda	Mianki	M.A.PTC		B.Ed	12-Aug-79			49.63	24-Apr-12	SPST	
93	582	Mukhtiar Ali	Sher Dast Khan	GPS Mandawa # 2	Latamber	MSC.PTC		B.Ed	16-May-84			49.54	27-Apr-12	SPST	
94	551	Inam ullah	Atta ullah Khan	GPS Said Ali Banda	Mianki	B.Sc.M.A		B.Ed	01-Mar-83	24-04-2012		49.37	24-Apr-12	SPST	
95	552	Muhammad Ijaz	Bahadar	GPS Kastair Banda	S.G.khel	MA.PTC	CT	BEDMED	01-Jan-87			49.3	24-Apr-12	SPST	
96	553	Aurangzeb	Shamsher Khan	GPS Makori #2	J.I.Khel	MA	CT	B.Ed	05-Sep-82			49.14	24-Apr-12	SPST	
97	554	Tariq Aziz	Abdul Aziz	GPS Guli Shah	Palosa Sar	Che		BED	03-Sep-84			48.71	24-Apr-12	SPST	
98	555	Wali Muhammad	Dost Muhammad	GPS Alam Sheri Killa	W.A.Abad	MA.PTC	CT		25-Feb-86			48.52	24-Apr-12	SPST	
99	556	Muhammad Tufail	Wahab Jan	GPS Jandri	Jandri	BA.PTC	CT	BED	12-May-86			48.42	24-Apr-12	SPST	
100	557	Mushtaq Shah	Amir Jan	GPS Odin Shah	S.G.khel	BSc Comp	CT		15-Feb-88			48.06	24-Apr-12	SPST	

New Sen: No	Old Sen: No	Name	Fathers Name	School Name	Union Council	Acad: Qual:	C/T	BE/ M.Ed	D/O Birth	D/O 1 <sup>st</sup> Apptt in Edu: Dept (UT/out Disstt:)	D/of T/ overcharge in the pres: Distt.	PTC Result/ Declaration/ Cretaria/ Total Aggregate	D/of Apptt/ Prom: ie traind teacher/ entry into Distt/Same adv: Distt: merit order	Present Desig:	Remarks
101	558	Ikram ullah	M.Rais Khan	GPS W.Gheri Khel	W.A.Abad	MA.PTC	CT	BED	15-Feb-79			47.89	24-Apr-12	SPST	
102	559	Umer Farooq	Salmu Rehman	GPS Shaheedan Chontra	Jandri	BA.PTC			02-Apr-82			47.83	24-Apr-12	SPST	
103	560	Mohd: Rauf Khan	Dost Mohd: Khan	GPS Lal Khel Rehmat Abad	Karak north	DAE.PTC			17-Sep-88			47.69	24-Apr-12	SPST	
104	602	Rehmat Gul	Muhammad Saleem	GPS Mandawa #1	Latamber	MA.PTC	CT	M.Ed	20-Jan-80			47.47	24-Apr-12	SPST	
105	591	Tahir Ullah	Shafi Ullah	GPS Fateh Khan Banda	Latamber	MA.PTC	CT	B.Ed	26-Aug-88			47.34	24-Apr-12	SPST	
106	561	Kifayat ullah	Abdul Sattar	GPS G.Siraj Khel	W.Siraj Khel	BA.PTC			01-Sep-88			47.34	24-Apr-12	SPST	
107	562	Sadiq Zaman	Janat Karim	GPS Ashkari ali Khel	GMK.khel	MA.PTC		BED	16-Apr-88			46.84	24-Apr-12	SPST	
108	563	Ishfaq -ur-Rehman	Gul Rehman	GPS Fateh Khan Banda	Latamber	MA.PTC	CT	MED	23-Sep-89			46.58	24-Apr-12	SPST	
109	564	Luqman Khan	Khan Badshah	GPS Urbashi	Gurguri	BA.PTC			20-Jun-83			46.33	24-Apr-12	SPST	
110	566	Shakir Mehmood	Muhammad Rafool	GPS Samandari Killa	Latamber	PTC		BED	30-Apr-84			46.14	24-Apr-12	SPST	
111	567	Muhammad Amin	Lal Badin	GPS Shekhan Saikot	W.A.Abad	MA.PTC	CT	BED	01-Jan-81			45.97	24-Apr-12	SPST	
112	568	Muzamil Shah	Zahir Shah	GPS Shawal Algada	Jandri	MA.PTC			11-Feb-84	23-Apr-12		45.4	24-Apr-12	SPST	
113	573	Ikram Ullah	Usman Gul	GPS Dagar Nari	Nari Panos	MA.PTC			10-Apr-75			45.38	26-Apr-12	SPST	
114	570	Shaheed Ahmad	Noor Faraz Khan	GPS Shagi Teri	Teri	BA.PTC			06-Nov-90			45.34	26-Apr-12	SPST	
115	569	Salah ud Din	Zain ud Din	GPS Tarkanen	GMK Khel	MA		B.Ed	01-Jan-85			45.32	24-Apr-12	SPST	
116	527	Mahboob ur Rahman	Zamir Ahmad	GPS Dagar Nari	Nari Panos	MA.PTC	CT		15-Apr-82			45.27	25-Apr-12	SPST	
117	572	Muhammad Latif	M Yousaf	GPS Mir Kalam	J.I.Khel	MA			05-Feb-80			45.23	24-Apr-12	SPST	
118	574	Muhammad Tufail	Saleem Gul	GPS Gurguri No.1	Gurguri	BA			13-Jan-84			45.21	24-Apr-12	SPST	
119	575	M. Shah Nawaz	Nawaz Gul	GPS Teri	Teri	BA.PTC	CT		05-Apr-85			45.16	24-Apr-12	SPST	
120	576	Atta Mohd: Khan	M Bashir	GPS J.I.khel	J.I.Khel	MA.PTC			15-Feb-83			45.03	24-Apr-12	SPST	
121	594	Khalid Rahman	Asal Mar Khan	GPS Bergie	Teri	MA.PTC	CT	M.ED	10-Mar-89			44.83	24-Apr-12	SPST	
122	577	Rahim Khan	Aqal Khan	GPS W.Seraj Khel	W.Siraj Khel	BA.PTC		BED	20-Jan-86			44.7	24-Apr-12	SPST	
123	578	Naz Mahmood	Nooraz Gul	GPS Shahidan Chontra	Jandri	MA.ADE/P		M.ED	09-Feb-84			44.64	24-Apr-12	SPST	
124	579	Kamran ullah	M.Ibrahim	GPS Tattar Khel	W.A.Abad	MSc		Bed	15-Apr-79			44.62	24-Apr-12	SPST	
125	580	Muhammad Ibrar	Abdul Majid	GPS Zanaka	J.I.Khel	MA.PTC			13-Oct-81			44.23	24-Apr-12	SPST	
126	571	Noor Zada	Shah Mast	GPS Tabi Khua	Nari Panos	MA.PTC			02-Mar-72			43.75	26-Apr-12	SPST	
127	581	Hameed Gul	Sultan Gul	GPS S.Lawaghar No #2	W.Siraj Khel	BA.PTC		M.Ed	04-Apr-83			43.54	24-Apr-12	SPST	
128	583	Muhammad Asif	Shaista Khan	GPS Teri No.1	Teri	BA.PTC			10-Apr-79			43.36	24-Apr-12	SPST	
129	584	Aqal Rias	M Rais	GPS J.I.Khel	J.I.Khel	MA	CT	BED	01-Mar-87			42.96	24-Apr-12	SPST	
130	600	Nasir Ahmad	Rashid Ahmad	GPS Totaki	Nari Panos	BA.PTC			04-May-82			42.38	24-Apr-12	SPST	
131	593	Khalid Usman	Noor Jamal	GPS W.Mir Hassan Khel	W.A.Abad	MA.PTC	CT	BED	15-Jan-79			42.36	24-Apr-12	SPST	
132	585	Rehmat Ali	Muzammel Shah	GPS Zebi Chani Khel	Palosa Sar	B.A		B.Ed	17-Nov-81			41.57	24-Apr-12	SPST	
133	587	Zafar Rehman	Khan Zad Gul	GPS Palosa Kimanri	Palosa Sar	B.A			06-Jan-78			38.27	24-Apr-12	SPST	
134	601	M. Kashif Rehman	Wali Rehman	GPS Deeli Mela	Sabir Abad	MA.PTC			01-Jun-93				24-Apr-12	SPST	deceased son

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135	538	M. Irshad Khan	Noor Khabat	GPS BADIN KHEL	GMK KHEL	BA.PTC	CT	B.Ed	26-Mar-85	06-12-12			12-Jun-12	SPST	
136		Imtiaz Ahmad	Wazir Rehman	GPS Jattan Banda	JEHANGERI	FA/PTC			03-Nov-81				15-Aug-12	SPST	deceased son
137	609	Khalil Ullah	Eid Bad Shah	GPS Karak sharki	Karak north	BA.PTC		B.Ed	04-Apr-84				01-Sep-12	SPST	deceased son
138	610	Shahidullah	Mohibullah	GPS Behram Khel	S.G.Khel	FSc			01-Mar-84				11-Dec-12	SPST	deceased son
139	611	Naseem Ijaz	Samar Bad Shah	GPS Kanda baji Khel	Mitha Khel	BA.PTC	CT DM	B.Ed	20-Apr-85				24-Dec-12	SPST	deceased son
140	612	Farman Ullah Khan	Aman Ullah Khan	GPS Ahmad Khel	Bahader Khel	MA.PTC	DAE	B.Ed	22-Jul-83				01-Oct-13	SPST	
141	613	Irshad Mohd: Khan	Ajab Khan	GPS Charda Manzai	J.I.Khel	MA.PTC	CT		16-Mar-86				01-Nov-13	SPST	
142	614	RAFI ULLAH	SHAH BARAZ KHAN	GPS Mashki Tangi	Siraj khel	Bsc MA		B.Ed	12-Mar-83			136.09	31-May-14	SPST	
143	615	MOHIB ULLAH	MIR KALAM KHAN	GPS Yaghi Musakan	Jahangiri	MBA			10-Apr-83			132.6	31-May-14	SPST	
144	631	MUHAMMAD ISLAM	ATLAS KHAN	GPS Y.G..Khel	Jahangiri	MA			02-Apr-80			132.6	08-Nov-14	SPST	
145	616	AKBAR ZAMAN	GUL SAEED SHAH	GPS Kando Khel Sharki	Esak Chontra	MA.PTC			13-Jan-83			131.29	31-May-14	SPST	
146	618	Fahim Ullah Khan	Abdul Qayyum	GPS Kamanger	Mitha Khel	MA		BED	04-Apr-91			124.36	31-May-14	SPST	
147	619	M. IRFAN GUL	FARID KHAN	GPS Shawanki Data Mine	Palosa Sar	MA			01-Jan-84			123.54	31-May-14	SPST	
148	620	ZAHID ULLAH	SHERIN RAHMAN	GPS Thoor Dhand	Karak South	BS.PTC		BED	31-Mar-89			122.67	31-May-14	SPST	
149	617	HANIF ULLAH	NOOR WALI KHAN	GPS Hukami Banda	S.G.Khel	BSc			15-Mar-94			117.1	08-Nov-14	SPST	
150	622	SHAHID ALI	SHER ALI	GPS Dakasi Banda	S.G.Khel	MSC.PTC		B.Ed	05-Sep-90			116.48	08-Nov-14	SPST	
151	621	MOHAMMAD RAZIM	MURAD ALI	GPS Surati Kala	Warrana	MA		Bed	15-Feb-75	1727-31	31-May-14	116.39	31-May-14	SPST	
152	624	SAEED AKHTAR	GUL MARJANN	GPS Ahmad Abad	Warrana	M.Sc Phy	C.T	M.Ed	08-Apr-82			116.28	31-May-14	SPST	
153	623	Aziz Ullah Khan	Salim Jan	GPS Paki Gudi Khel	S.G.Khel	MA	CT	B.Ed	28-Mar-86			115.6	08-Nov-14	SPST	
154	625	TARIQ ANWAR	DILAWAR KHAN	GPS Awazi Banda	Chokara	BSC.PTC			01-Apr-86			114.34	31-May-14	SPST	
155	627	ZIA UR REHMAN	GULAB KHAN	GPS Tanga Zana	Warrana	M.A		B.Ed	24-Mar-84			113.53	31-May-14	SPST	
156	628	MUHAMMAD ASHRAF	MATEE UR RAHMAN	GPS Zawahir Jan Korana	Warrana	B.A			01-Mar-86		31-May-14	112.88	31-May-14	SPST	
157	629	USMAN ULLAH	AZIZ UR RAHMAN	GPS Kurishki Kala	Chokara	Maths	CT	M.Ed	07-Apr-80			112.45	31-May-14	SPST	
158	647	TARIQ REHMAN	LAL ZAFAR	GMPS Ahmad Wala	Chokara	Maths,BSc	CT	M.Ed	03-Oct-83			112	01-Sep-14	SPST	
159	630	RAHMAN ULLAH	NOOR ZARIF KHAN	GPS Sardar Koroona	Esak Chontra	MSc		BEd	12-Feb-90			111.96	31-May-14	SPST	
160	632	BARKAT SHAH	RAHMAT SHAH	GPS Mamani Lawaghar	Esak Chontra	MA			08-03-84			111.6	31-May-14	SPST	
161	633	RAHAM DIAZ	RAMAZAN KHAN	GPS Haji Banda	Warrana	M.A		B.Ed	11-Apr-80			111.49	31-May-14	SPST	
162	634	AKHTAR MUNEER KHAN	SHARIF KHAN	GPS Babal Khel	Chokara	maths	CT	B.Ed	16-Apr-89			111.47	31-May-14	SPST	
163	635	USMAN ULLAH	RAHMAN ULLAH	GPS Otash Banda	Warrana	Mphil bio	CT	MEd	08-Apr-85			110.82	31-May-14	SPST	
164	636	MUHAMMAD FAROOQ	AKBAR ZAMAN	GPS Ambiri Kalla	Chokara	MSC.PTC	CT.DM	BED.MED	12-Aug-82			110.31	31-May-14	SPST	
165	637	SAJID ISLAM	MAID ULLAH KHAN	GPS Otash Banda	Warrana	Statistics		B.Ed	10-Apr-84			109.72	31-May-14	SPST	
166	638	SHAFIQ ULLAH	DOST MUHAMMAD	GPS Muhabathi Kalla	Warrana	M.A. PTC		BED	03-Mar-78			107.98	31-May-14	SPST	
167	639	SAIF ULLAH	AKBAR ALI KHAN	GPS Ahmed Khan	Chokara	BA.PTC			21-Sep-82			107.34	31-May-14	SPST	
168	640	GUL RAIEP KHAN	MUHAMMAD AYAZ	GPS Amin Khel	Chokara	MA.PTC		BED.MED	04-Mar-81			106.84	31-May-14	SPST	



New Sen: No	Old Sen: No	Name	Fathers Name	School Name	Union Council	Acad: Qual:	CIT	BEd/ M.Ed	D/O Birth	D/O 1 <sup>st</sup> Apptt in Edu: Dept (UT/out Disstt:)	D/of T/ overcharge in the pres: Distt.	PTC Result/ Declaration/ Cretaria/ Total Aggregate	D/of Apptt:/ Prom: ie traind teacher/ entry into Distt/Same adv: Distt: merit order	Present Desig:	Remarks
169	641	HAZRAT USMAN	M. FAYAZ KHAN	GPS Chokara	Chokara	Bsc			20-Sep-83			106.7	31-May-14	SPST	
170	642	MUSHTAQ AHMAD	GUL MARJAN	Koroona	Warrana	Statistics		B.Ed	25-Apr-84			105.65	31-May-14	SPST	
171	643	SHAH KHALID	FAZAL MUHAMMAD	GPS Hazrat Shah	Warrana	MA ENG		M.Ed	15-Jun-81			104.88	31-May-14	SPST	
172	644	KHAN WALI	MIR SAHIB JAN	Koroona	Warrana	M.A Bed		B.Ed	25-Mar-83			102.48	31-May-14	SPST	
173	645	NAQEEB ULLAH	NASEEB UR RAHMAN	GPS Ahmed Abad	Warrana	M.Sc	CT	B.Ed	05-May-87			101.41	31-May-14	SPST	
174	648	IMRAN ULLAH KHAN	GHULAM RASOOL	GPS Paloski	Warana	BA.PTC			12-Feb-88			100.44	13-Jun-14	SPST	
175	646	M. USMAN	BABRI GUL	GPS Sam Banda	Gurguri	MBA	CT	M.Ed	25-Apr-86			95.94	31-May-14	SPST	
176	659	RIZWAN ULLAH	NOOR SHAH DIN	GPS SARWAN BANDA	TERI	BBA(Hon)			15-Sep-85			148.68	14-Mar-15	SPST	
177	626	SHAHID UR RAHMAN	ZAHIR SHAH	GPS CHANDA MANZAI	J I KHEL	Msc	CT	B.Ed	15-Apr-90			134.35	14-Mar-15	SPST	
178	707	ASHRAF JAMAL SHAH	NOOR JAHAN SHAH	GPS ZARIN KALLA	SG KHEL	MSc		M.Ed	21-Feb-88			130.41	15-Mar-15	SPST	
179	667	MUHAMMAD SHABIR	SAIF UR RAHMAN	GPS YOUSAF KHEL	CHOKARA	MSC.PTC	CT	B.Ed	10-Apr-93			125.62	15-Mar-15	SPST	
180	530	SHAHID ULLAH KHAN	HAJAT NOOR	GPS HASSAN BANDA	J I KHEL	BA			20-Feb-87			125.14	14-Mar-15	SPST	
181	654	M. WASIM KHAN	ISLAM GUL KHATTAK	GPS Teri South	TERI	MA		B.Ed	09-Nov-84			119.83	14-Mar-15	SPST	
182	685	SHAHID NAWAZ	SARDAR MIR	GPS NARI PANOS	NARI PANOS	MA.PTC			01-Jul-88			119.75	14-Mar-15	SPST	
183	686	RAFI ULLAH	QABUL MOHD:	GPS KANDO KHEL WASTI	ESAK CHONTARA	MA.PTC		B.Ed	12-Mar-80			119.28	14-Mar-15	SPST	
184	687	ABID ULLAH	ANWAR SHERIN	GPS MANSOOR GARGH	J I KHEL	BA			15-May-88			119.04	14-Mar-15	SPST	
185	688	SIKANDER JEHANZEB	MUHAMMAD RIAZ	GPS SIKANDAR SHAH	NARI PANOS	MA.PTC			01-May-86			118.96	14-Mar-15	SPST	
186	689	AMJAD NAWAZ	KHUZ MEEN GUL	GPS MAMI KHEL	J I KHEL	MA		B.Ed	01-Aug-88			118.72	14-Mar-15	SPST	
187	690	HAROON ULLAH	RAIS KHAN	GPS SHIEKHN MAMI KHEL	J I KHEL	BBA			18-Oct-91			118.11	14-Mar-15	SPST	
188	692	GHAFOOR RAHMAN	NAWA JANG	GPS ESAK KHUMARAI	TERI	BA			13-Jun-68			107.82	14-Mar-15	SPST	
189	697	BARKAT ELAHI	MANZOOR ELAHI	GPS SHAHEEDA BANDA	TERI	M.SC			03-Sep-86			106.55	14-Mar-15	SPST	
190	698	SAEED USMAN	KHAN SAMEER	GPS SADDIQ ABAD	TERI	BA			01-Apr-89			104.74	14-Mar-15	SPST	
191	701	ZABEEH UL HAQ	MATI UR RAHMAN	GPS TERI	TERI	BA	PET		18-Apr-88			102.91	14-Mar-15	SPST	
192	702	M. ISHAQ	HAMZ ULLAH KHAN	GURGURI	GURGURI	BA			16-Mar-88			102.69	14-Mar-15	SPST	
193	703	SHOAIB REHMAN	EID MARJAN	GPS MARDAN KHEL - I	GURGURI	BSC			07-Feb-92			101.5	14-Mar-15	SPST	
194	704	ZUBAIR AHMAD	RAHIM BADSHAH	GPS GURGURI	GURGURI	B.SC			01-Mar-91			97.59	14-Mar-15	SPST	
195	705	KHALID USMAN	AZIZ KHAN	GPS KUNDI	GURGURI	MA	PTC		07-Apr-94			97	14-Mar-15	SPST	
196	706	NOOR ZAMAN	RUSTAM KHAN	GPS AMAN KOT	GURGURI	BA	PTC		12-Nov-80			94.75	14-Mar-15	SPST	
197	779	RASHID IQBAL	JAMAL NOOR	GPS ALGADI GHARBI	NORTH KARAK	MSC	PTC	M.Ed	02-Mar-83			0	31-Aug-15	SPST	
198	709	ABDUL WAHAB	GHULAM JELANI	GPS LATAMBER NO.2	LATAMBER	MSC	PTC/ADE	B.Ed	15-Mar-87			0	01-Sep-15	SPST	
199	766	FARID ULLAH	GHAZI MARJAN	GPS GURGURI 1	GURGURI	B.Sc			20-Apr-89			143.59	19-Mar-16	SPST	
200	547	M. AWAIS NOOR	GHAZI MARJAN	GPS GURGURI 1	GURGURI	MA	CT	B.Ed	28-Feb-83			124.56	19-Mar-16	SPST	
201	777	AKHTAR JAN	NOOR MAR JAN	GPS GHOL BANDA	BAHADER KHEL	MSC.PTC			07-Apr-91			123.39	16-Apr-16	SPST	
202	725	ZAHID ULLAH	FARID KHAN	GPS SHAHEEDA BANDA	TERI	MBA. PS.		B.Ed	25-Mar-86			121.93	19-Mar-16	SPST	

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203	736	SAEED-UR-RAHMAN	AMAL JAN	GPS BAHADER KHEL	BAHADER KHEL	MA.PTC			01-Apr-91			118.53	16-Apr-16	SPST	
204	778	TAHIR ULLAH	BILAWAR KHAN	GPS DARISH KHEL	BAHADER KHEL	BS			16-Mar-89			117.93	18-Apr-16	SPST	
205	784	KAMRAN ULLAH	KALU KHAN	GPS MIR KALAM	J.I.KHEL	MA			10-Jan-89			115.22	31-Mar-16	SPST	
206	708	Usman Ud Din	Alif Rehman	GPS AMAN KOT	Gurguri	BBA	CT	B.Ed	10-Nov-86			115.05	19-Mar-16	SPST	
207	675	AZHAR MAHMOOD	ZAIN ULLAH KHAN	GPS DAGAR NARI	NARI PANOS	BS.PTC	CT	B.Ed	04-Aug-87			111.7	19-Mar-16	SPST	
208	764	QISMAT ULLAH	SHER DARAZ	GPS MIR AJAB KOROONA	NARI PANOS	MA		B.Ed	01-Feb-88			108.68	19-Mar-16	SPST	

No.	Name	Liberty Name	School Name	Union Council	Acad. Qual.	Cr.	DOB	D/O Birth	1st Appt. in Edu Dept (if not Dismiss)	1st Appt. overcharge in the pres. Distt.	PTC Result Declaration/ Certificate/ Total Aggregate	1st Appt. Promote to trainee teacher/entry into Distt/Name and Distt: merit order	Present Design	Remarks
209	736	NAVTEED KHAN	ABDUL BAD SHAH	GPS DALLAN SHEKHAN	JJ KHEL	MA PTC	CT	B ED	16 Jul-93		108.05	31-Mar-16	SPST	
210	767	MUDASSIR IQBAL	FAZAL NAWAZ	GPS BOZA	JJ KHEL	BA			19 Jan-92		107.11	31-Mar-16	SPST	
211	739	SHAMSYA WALI	DAWAR KHAN	GPS BANGI KALLA	GURGURI	MA			18-Mar-81		105.18	19-Mar-16	SPST	
212	769	RASHID MEHMOOD	SABIR MEHMOOD	GPS MAKORI - 2	JJ KHEL	BA			10-Oct-94		104.34	31-Mar-16	SPST	
213	772	MUHAMMAD KHAN	AMAN ULLAH	GPS HALALA	JJ KHEL	MA			6-Mar-88		104.34	31-Mar-16	SPST	
214	773	TAHIR IQBAL	GUL KHAN SHAH	GPS MAKORI NO.1	JJ KHEL	BA			12-Jan-94		102.91	31-Mar-16	SPST	
215	774	ABID ULLAH	RASTA GUL	GPS MARKI KHEL	JJ KHEL	BA			10-Nov-91		102.8	31-Mar-16	SPST	
216	775	AURANGZEB AKHTER	SUBEDAR MAHMOOD IAH	GPS SHAYER KHEL	JJ KHEL	MA		BED	7-Sep-81		98.94	31-Mar-16	SPST	
217	748	M. HAZ KHATTAK	SULTAN MOHD.	GPS ESAR KHUMARI	TERI	M.Sc/	CT	B.ED	9-Sep-82		92.88	16-Apr-16	SPST	
218	749	NASIR MAHMOOD	ADAL MUHAMMAD	GPS AHMADI BANDA	TERPI	MA	PTC		25-Nov-83		91.97	27-May-16	SPST	
219	771	WASEEM SAJJAD	TIKKA KHAN	GPS GURGURI	GURGURI	FA			15-May-94		89.31	19-Mar-16	SPST	
220	780	M. IDREES	JAHNAT KHAN	GPS SAME RAHDA SHARI	GURGURI	BBA	PTC		10-Apr-88		86	19-Mar-16	SPST	
221	781	ZAHOOR ELAHI	WATAH BAUSHAH	GPS URBASHI	GURGURI	BA			23-Mar-89		85.34	19-Mar-16	SPST	
222	782	IMRAN KHAN	SIAL DAN KHAN	GPS LANDOI	GURGURI	BA, PTC			12-Mar-90		83.14	19-Mar-16	SPST	
223	783	AKHTAR NAWAZ	WAHED GUL	GPS MARDAN KHEL 1	GURGURI	BSC			16-Mar-93		81.84	19-Mar-16	SPST	

Deputy District Education Officer  
Male Karak

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Male Karak

District Education Officer  
Male Karak

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR.

Service appeal No. 559 of 2022

Mehboob Ur Rehman

(Appellant)

VERSUS

Director Education (E & SE) & Others

(Respondents).

AFFIDAVIT

I, Abdullah Khan, ADEO Estb: Secy: in DEO (M), Karak do hereby solemnly affirm and declare on oath that all the contents of accompanying joint Para wise reply are true and correct to the best of my knowledge and belief, nothing is lie and nothing has been concealed from this Hon'able Service Tribunal

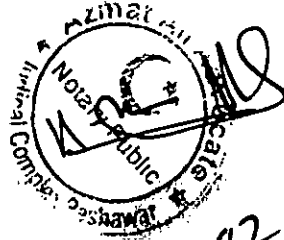
Dated 24 / 02 / 23

Deponent



14201-2122-625-5

**ATTESTED**



24-02-2023

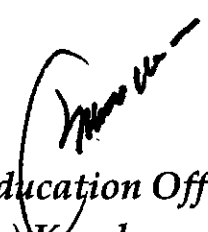
OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KARAK.

No 866

Dated 23-02-2023

AUTHORITY LETTER

Mr. Abdullah Khan, ADEO Estb: Secy: in DEO (M), Karak is hereby authorized to file written comments on behalf of Official respondents in Service Appeal No. 559/2022 titled "Mehboob-Ur-Rehman V.S Director Education (E&SE) & Others Khyber Pakhtunkhwa Service Tribunal, Peshawar.

  
District Education Officer  
(Male) Karak

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR.

Service appeal No. 559 of 2022

*Mehboob UR Rehman* (Appellant)

VERSUS

*Govt: of KPK & Others* (Respondents)

Para Wise Written Reply on behalf of Respondent No. 1, 2, 3 & 4

Respectfully Sheweth

Preliminary Objections.

1. That appellant has got no cause of action to file the instant service appeal.
2. That the above titled service appeal is wrong, incorrect and against the law & facts.
3. That the appellant is estopped to file the instant service appeal by his own conduct.
4. That the instant service appeal is not maintainable in its present form.
5. That the appellant has not come to this Honourable Tribunal with clean hands and concealed the facts.
6. That the instant service appeal is liable to be dismissed due to mis-joinder & non-joinder of necessary party.
7. That the instant service appeal is badly time barred and is liable to be dismissed in limine.
8. That no departmental appeal has been filed by the appellant which is required of law and service rules.

Factual Objections

1. Para No. 1 pertains to record.
2. Para No. 2 pertains to record.
3. Para No. 3 pertains to record.
4. Para No. 4 is incorrect. Further stated that the seniority has been revised and prepared on the basis of merit list mentioned in the appointment order. He will be promoted on his own turn according to seniority list. The appellant has not been suffered due to entry of appointment date in his service book, rather he is not due for promotion at this stage. He is at S.No.116 in seniority list and will be promoted at his own turn. (Updated Seniority list attached as Annex 'A').
5. Reply of Para No. 5 to record with further explanation the appellant filed application for correction at very belated time, however entry of date in service book has no concern with seniority.
6. Reply of Para No. 6 is that the matter has been resolved and uniform policy of seniority on the basis of merit mentioned in the appointment

order has been applied and the appellant has been placed at his right place in the seniority list.

- 7. Para No. 7 is that uniform policy of merit list has been applied and the appellant has been placed at his right place.
- 8. Reply of Para 8 is that seniority has been updated and revised according to merit list and the appellant has been placed at S.No. 116 and will be promoted as per seniority list.
- 9. Para No. 9 is incorrect with further explanation that seniority is prepared on the basis of merit list mentioned in the appointment order and he will be promoted on his own turn as per seniority list.

Objection on Grounds.

- A. Ground "A" is incorrect and wrong hence denied. Respondent No. 2 has rightly updated and issued seniority list as per available official record. The appellant is not recommended for promotion because he is low in seniority.
- B. Ground "B" is incorrect and wrong hence denied. *As replied above*
- C. Ground "C" is incorrect. As stated above that the seniority is prepared according to merit mentioned in the appointment order. In the seniority list he is junior and hence not recommended for promotion at this stage. He will be promoted at his own turn according to seniority.
- D. Ground "D" is incorrect and wrong. He has not suffered due to wrong entry in his service book rather he has low and is junior to his other colleagues.
- E. Ground "E" is incorrect and wrong. As replied in above paras.
- F. Ground "F" is legal hence comments at this stage. *the respondents seek leave to raise additional grounds at the time of arguments.*

Prayer

It is therefore requested that on acceptance of parawise reply, the appeal of the appellant may very graciously be dismissed.

Dated: - ----/-----/23

**Respondent No.1.**  
**Director E&SED**  
**Khyber Pakhtunkhwa Peshawar**

*[Handwritten Signature]*  
**Respondent No. 2.**  
**District Education Officer**  
**(Male) Karak.**

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**Respondent No.3 .**  
**Sub Divisional Education Officer**  
**B.D.Shah Karak**

**Respondent No.4**  
**Superintendent DEO (M) Karak**

called subject to correction,  
attachment of all documents with  
proper notes, affidavit and  
approval of AAE

DAE  
22/02/2023

AAE  
22/2/23