

EP 41/2018

30.12.2019

Petitioner alongwith counsel 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



21.10.2019

Junior to counsel for the appellant present.

Junior to counsel for the appellant requests for adjournment as senior learned counsel is not available due to general strike on the call of the Provincial Bar Council.

Adjourned to 20.11.2019 before S.B

A J R



Chairman

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

21.10.2019

Junior to counsel for the appellant present.

Junior to counsel for the appellant requests for adjournment as senior learned counsel is not available due to general strike on the call of the Provincial Bar Council.

Adjourned to 20.11.2019 before S.B

Chairman

03.07.2019

Counsel for the petitioner and Mr. Muhammad Jan, Deputy District Attorney alongwith Mr. Inayatullah, ADO for the respondents present. Representative of the department submitted reply. Copy of the same is handed over to learned counsel for the petitioner. Adjourned to 27.08.2019 for further proceedings before S.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

27.08.2019

Counsel for the petitioner and Addl. AG alongwith Inayatullah, ADO for the respondents present.

Learned counsel for the petitioner requests for adjournment as he is engaged today in various cases before the Honourable High Court.

Adjourned to 25.09.2019 for further proceedings before S.B.


Chairman

25.09.2019

Counsel for the petitioner and Addl. AG alongwith Inayatullah, ADO for the respondents present.

Learned counsel for the petitioner requests for time to work out the correct seniority of petitioner and also provide the names of officials who have been promoted against 33% quota to Junior Clerk after the settlement of seniority list dated 04.05.2018 and require to be excluded there-from.

Adjourned to 21.10.2019 for further proceedings.


Chairman

15.03.2019

Petitioner with counsel and Mr. Kabir Ullah Khattak learned Additional Advocate General present. Learned counsel for the petitioner stated that the petitioner is not satisfied with the implementation report submitted by the respondent department and requested for furnishing updated seniority list of Class-IV and Junior Clerks. Inayat Ullah ADO representative of the respondent department absent. He be summoned with the direction to furnish seniority list of Class-Iv and Junior Clerks of the office of DEO (E&SE) (Male) Nowshera on the next fixed as 16.04.2019 before S.B



Member

16.04.2019

Learned counsel for the petitioner and submitted miscellaneous application requiring certain documents. To come up for reply and arguments on the said application and further proceedings on 23.05.2019 before S.B



Member

23.05.2019

Petitioner with counsel present. Mr. Usman Ghani learned District Attorney alongwith Inayat Ullah ADO present. Representative of the respondent department received copy of miscellaneous application as mentioned in the preceding order sheet and seeks adjournment to furnish reply of the same. Adjourn. To come up for reply and argument on the miscellaneous application mentioned in the preceding order sheet dated 16.04.2019 on 03.07.2019 before S.B.



Member

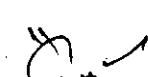
31.10.2018

Due to retirement of Hon'ble Chairman, the Tribunal is defunct. Therefore, the case is adjourned. To come up on 18.12.2018.


Reader

18.12.2018

Inayat Ullah ADO representative of the respondent department present and submitted implementation report which is placed on file. Adjourn. To come up for further proceedings/arguments on 30.01.2019 before S.B


Member

30.01.2019

Counsel for the petitioner present. Mr. Kabirullah Khattak, Additional AG for the respondents present. Record reveals that the implementation report has already been submitted by the respondents on the previous date. However, learned counsel for the petitioner seeks adjournment to examine the same. Adjourned. To come up for further proceedings on 15.03.2019 before S.B.


(Muhammad Amin Khan Kundi)
Member

10.07.2018

Petitioner with counsel present. Mr. Sardar Shoukat Hayat, Additional AG for the respondents also present. Representative of the department is not in attendance therefore, notice be issued to the respondents with the direction to direct the representative to attend the court. Adjourned. To come up for implementation report on 07.08.2018 before S.B.


(Muhammad Amin Khan Kundi)
Member

07.08.2018

Petitioner Ibrahim Khan in person alongwith his counsel Mr. Gohar Ali Khuwshgi, Advocate present. Mr. Inayat Ullah, ADO alongwith Mr. Kabirullah Khattak, Advocate for respondents present and made a request for adjournment to produce implementation report on next date. Granted. To come up for implementation report on 25.09.2018 before S.B.


Chairman





25.09.2018

Petitioner Ibrahim in person alongwith his counsel Mr. Gohar Ali, Advocate present. Mr. Shamsul Islam, ADO alongwith Mr. Kabirullah Khattak, Addl. AG for the respondents present. To come up for further proceedings alongwith connected E.P No. 42/2018 before S.B.


Chairman

FORM OF ORDER SHEET

Execution Petition No. 41/2018

S.No.	Date of order Proceedings	Order or other proceedings with signature of Judge
1	2	3
1	08.02.2018	<p>The Execution Petition of Mr. Ibrahim Khan submitted to-day by Mr. Gohar Ali Khesghi Advocate may be entered in the relevant Register and put up to the Court for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2	08/02/18.	<p>This Execution Petition be put up before S. Bench on- <u>26/02/18.</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	26.02.2018	<p>Counsel for the petitioner and Addl: AG for respondents present. Notices be issued to the respondents for submission of implementation report. To come up for further proceedings on 24.04.2018 before S.B.</p> <p style="text-align: right;"> (Ahmad Hassan) Member (E)</p>
	24.04.2018	<p>Petitioner in person present. Mr. Kabirullah Khattak, Additional AG for the respondents also present. Respondents are directed to submit seniority list on the next date. Adjourned. To come up for seniority list on 10.07.2018 before S.B.</p> <p style="text-align: right;"> (Muhammad Amin Khan Kundi) Member</p>

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

Execution Petition No. 41/2018

C.O.C No. _____/2018

In

Appeal No. 305/2014

Ibrahim Khan.....(Petitioner)

VERSUS

Mr. Rafiq Khattak and another.....(Respondents)

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Ibrahim Khan
Petitioner

Through

Dated: 06/02/2018

Gohar Ali Khesghi
Advocate High Court
Peshawar
Gohar Ali
Advocate High Court,
Peshawar.
Cell No. 0345-9082942

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR.

Execution Petition NO. 42/2018

C.O.C No. _____/2018

Khyber Pakhtunkhwa
Service Tribunal

In

Diary No. 159

Appeal No. 305/2014

Dated 08/02/2018

Ibrahim Khan, Class-IV, Government High Secondary School,
Kheshgi 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. 305/2014 OF
THIS HON'BLE TRIBUNAL, WITHOUT
PREPARING PROMOTION LIST STAGE
WISE AND CALCULATION ON 33% QUOTA
OF CLASS-IV SINCE FIRST STAGE OF
SERVICE.

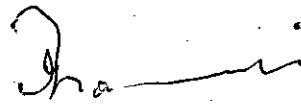
Respectfully Sheweth:

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 1993/94 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.

4. That the respondent conducts directly amounts to contempt of Court.

It is, therefore, requested that the respondents may please be directed to implement the order of promotion of the petitioner as early as possible according to law and rules and also initiate contempt proceeding against the respondents.



Petitioner

Through

Dated: 06/02/2018



Gohar Ali

Advocate High Court,
Peshawar.

Cell No. 0345-9082942

Gohar Ali Kheshgi
Advocate High Court
Peshawar

4

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR.

C.O.C No. _____/2018

In

Appeal No. 305/2014

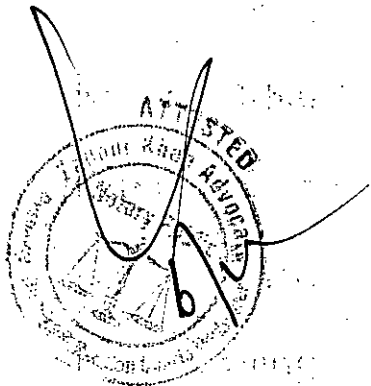
Ibrahim Khan.....(Petitioner)

VERSUS

Mr. Rafiq Khattak and another.....(Respondents)

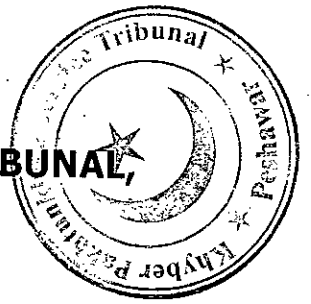
AFFIDAVIT

I, Ibrahim Khan, Class-IV, Government High Secondary School, Kheshgi Payan, Tehsil and District Nowshera, do hereby solemnly affirm and declare that all the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



Ibra
DEPONENT
17201-0982-171-5
Hon'ble Ali Kheslegi
Advocate High Court
Peshawar

P. A
5



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

Appeal No. 305 /2014

349
04/3/2014

Mr. Ibrahim Khan, 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 APPOPIRATE THAT MAY
ALSO BE AWARDED IN FAVOUR OF APPELLANT.

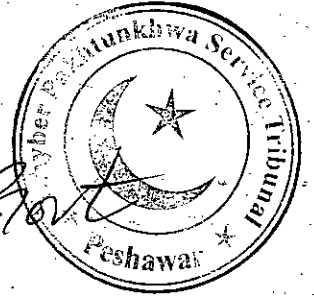
.....
4/3/14

RESPECTFULLY SHEWETH:

1. That the appellant joined the respondent department on
28.04.1998. The appellant more than 15 years service
with good record through out at his credit. Copy of
Appointment Order is attached as Annexure-A.

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar



A. No. 305/2017

M. Ibrahim Khan vs Govt

27.10.2017

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.

Amruneed *Self-Niaz Muhammad Khan*
27.10.2017 *Chairman*

Self Ahmad Hassan
Members



Date of Presentation of Appeal 14-12-17
Number of Words 880
Copying Fee 6
Urgent 2
Total 8
Name of Officer [Signature]
Date of Copying 14-12-17
Date of Delivery of Copy 14-12-17

Certified to be true copy

[Signature]
Peshawar

B


حکومت پاکستان
قومی شناختی کارڈ
17201-0982171-5

جنس: مرد
والد کا نام: سر محمد علی
پتہ: پاکستان، گلبرگ، اسلام آباد
03/01/1971

رجسٹرڈ منسٹر برائے داخلہ

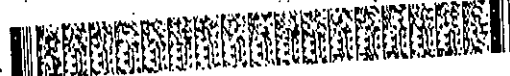
قومی شناختی کارڈ نمبر: 17201-0982171-5
T6J6PJ



13882321488

17/01/2022 تا 17/01/2012

کے۔ کارڈ ہے برائے قومی شناختی کارڈ میں داخلہ



Adil
Adil Khesghi
 Advocate High Court
 Peshawar

کے نو درجہ دستاویز (7) B

درخواست نمبر 305/2014
سرورس ٹریبیونل شاہ پور ایس ایچ 305/2014
27-10-2017

محکمہ عالی: سب سے پہلے عرض کیا ہے۔

1۔ یہ کہ سب سے پہلے عرض کیا ہے کہ اس میں کوئی شک نہیں ہے کہ اس میں کوئی شک نہیں ہے۔

2۔ یہ کہ سب سے پہلے عرض کیا ہے کہ اس میں کوئی شک نہیں ہے کہ اس میں کوئی شک نہیں ہے۔

اس کے دستاویز کے ساتھ اس میں کوئی شک نہیں ہے کہ اس میں کوئی شک نہیں ہے۔

تاریخ 30 اکتوبر 2017ء

محمد علی احمد صاحب

17201-0982171-5

Gonar Ali Kheshgi
Advocate High Court
Peshawar

Signature

قیمت 50 روپے	پشاور بار ایسوسی ایشن PBA	25660
ایڈوکیٹ: <u>سید علی حوشکی</u>	پشاور بار ایسوسی ایشن، خیبر پختونخواہ	
بار کونسل ایسوسی ایشن نمبر: <u>10-7448</u>		
رابطہ نمبر: <u>0345-9082942</u>		

بعدالت جناب: سید علی حوشکی کے لئے درخواست

منجانب: <u>سید ابراہیم خان</u>	دعویٰ:
<u>اسراہیم خان ولد محمد خان گل اس فور</u>	علت نمبر:
<u>سورٹنگ بائیس سیکنڈری سکول خٹک باہان وطن</u>	مورخہ:
<u>بنام</u>	جرم:
<u>رضوی فٹک و سنڈرا</u>	تھانہ:

باعت تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
 آن مقام لسٹا کے لئے سید علی حوشکی کو وکیل مقرر
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے
 المرقوم: محمد عزیز 18/8/2018

مقام لسٹا کے لئے منظور ہے۔
Attestd Jangal

سید ابراہیم خان

نوٹ: اس وکالت نامہ کی فونو کاپی ناقابل قبول ہوگی۔

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

E.P No.41/2018

in

Appeal No. 305/2014

Mr. Ibrahim KhanAppellant.

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



**OFFICE OF THE
DISTRICT EDUCATION OFFICER, (MALE),
NOWSHERA**

PHONE # 0923-9220228 , FAX # 0923-9220228

NOTIFICATION

Consequent upon the recommendations of the Departmental Promotion committee meeting held on 26-10-2018, and in Compliance with the order / direction of the Khyber Pakhtunkhwa Service Tribunal in service appeal No.304/2014(Execution Petition No.43/2018) dated 25-09-2018, and in pursuance of S.No: 09 of the notification issued by the Govt: of Khyber Pakhtunkhwa (E & S):Education department Notification No. SO (PE) 14-10/SSRC/Ministerial Staff/ 2013 dated: 28-01-2013, the following Class-IV employees are hereby promoted to the post of **Junior Clerk BPS-11 (12570-880-38970)** 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 given below:-

S#	S.L No:	Name & Designation	Father's Name	Present Place of duty.	Posted as Junior Clerk B-11
01	01	Mr. Rahat Shah Lab: Attendant.	Mr. Bukhari Shah	GHSS Akbar Pura	GHSS, Pirpai Nowshera.
02	02	Mr. Munawar Shah Chowkidar	Rasool Shah	GHS Aza Khel Bala	GHSS, Khair Abad Nowshera.
03	03	Mr. Akhtar Munair Chowkidar	Adam Khan	GPS Dag Behsud	GHS, Palosi Payan Nowshera.

TERMS & CONDITIONS:

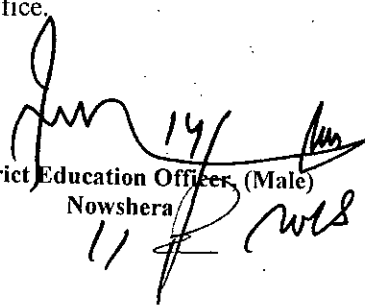
1. They shall be on probation for a period of one year extendable for another one year.
2. They should join their post within (15), fifteen days, of the issuance of this Notification.
3. They shall be governed by such rules and regulations may be issued time to time by the Government.
4. Charge report should be submitted to all concerned.
5. The DDO concerned will verify their documents before release of their pay; if documents were found bogus they will be terminated.
6. Necessary entries should be made in his /their service Book to the effect that if the said promotion was withdrawn due to the representation / appeal by any other senior eligible Candidate/or by the court, recovery of the monitory benefit, taken during the said period, will be recovered from the officials concerned.
7. No. TA/DA is allowed for joining their duty.
8. They will give 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.

(FAYAZ HUSSAIN)
District Education Officer, (Male)
Nowshera

13865-74
Endstt: No. _____/DEQ (M) NSR/EA-S/Prom: of Class-IV to J/C/2018. Dated Nowshera the 14 /11/2018

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

1. Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar in Service Appeal No.304/2014.
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 Department, 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.


District Education Officer, (Male)
Nowshera

Before the Service Tribunal K.P.K. Petition

Su Appeal No - 305/2014

D Mohd Ibrahim &

Other Connected Petitioners

- vs -

Envt & others

- ① ~~Abdullah~~ Abschikhom
- ② Abdurahim

Application for Submission of

- 1 - The list of Candidates showing date of birth & Date of appointment along with seniority no. of the promotees and others already on waiting list since 1992.
- 2 - The name of fresh appointees enables to determine the percentage of appointment since 1992.

R/siv

- 1 - The petitions submits as under -
- 2 - That the execution of the above appeal is pending today date is 16⁴/₂₀₁₉ that the list already submitted does not clarify the situation -
- 3 - That the reply of the respondents does not commensurate with the judgment of this honorable court in the appeal above.

Therefore the respondents may please be directed to submit the list as suggested since 1992.

Date 16⁴/₂₀₁₉

through Goshali Petitioners
Kheohji abmat

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

E.P No.41/2018

in

Appeal No. 305/2014

Mr. Ibrahim KhanAppellant.

VERSUS

Govt & Others..... Respondents

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Deponent

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

E.P No.41/2018
in
Appeal No. 305/2014

Mr. Ibrahim KhanAppellant.

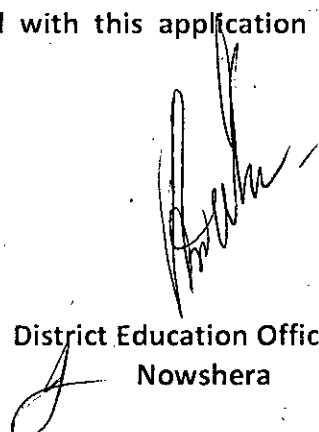
VERSUS

Govt & Others..... Respondents

Reply of Civil Miscellaneous Application 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 03-07-2019.
2. That the information asked has already been submitted before this Honorable Tribunal in the main appeal, however, information/record is annexed with this application for your kind perusal please.
3. That the information/record is annexed with this application for your kind perusal please.


District Education Officer (M)
Nowshera

درخواستیں مطابقت دستی

محکمہ انسپکشن آف ایڈیٹنگ ڈویژن ایجوکیشن ضلع نوشہرہ کے زیر انتظام (male) مندرجہ ذیل کیڈرز کی خالی آسامیوں پر ایڈ ہاک (Adhoc Based) تقرریوں کیلئے ضلع کے سکول اہل امیدواروں سے مجوزہ فارم پر مورخہ 7/9/2015 تک درخواستیں مطلوب ہیں۔ درخواست فارم این ٹی این (NTS) کی ویب سائٹ (<http://www.nts.org.pk>) پر دستیاب ہے۔ یاد رہے کہ نامکمل اور مقررہ تاریخ گزرنے کے بعد موصول ہونے والی درخواستوں پر غور نہیں کیا جائیگا۔

نمبر شمار	آسامی	تالیبت	عمر کی حد
1	کمپیوٹر آپریٹر B-12	کمپیوٹر سائنس (سیکنڈ ڈویژن) I.T کسی بھی تسلیم شدہ یونیورسٹی سے۔ یا۔ بی اے (سیکنڈ ڈویژن) کسی بھی تسلیم شدہ یونیورسٹی سے بعد ایک سالہ کمپیوٹر سائنس ڈپلومہ کسی بھی تسلیم شدہ سینکڑوں بورڈ یا یونیورسٹی یا حکومتی ادارے سے۔	18 تا 30 سال
2	جونیئر کلرک، B-11	ایس ایس سی (سیکنڈ ڈویژن) کسی بھی تسلیم شدہ بورڈ سے بعد ٹائپنگ سرٹیفکیٹ 35 الفاظ فی منٹ کمپیوٹر خواندہ کو ترجیح دی جائے گی۔	18 تا 30 سال

انتخابی معیار (Selection Criteria) :-

(الف) میرٹ کی بنیاد پر بنیادی تقرری عمل میں لائی جائے گی۔ (ب) سروس رولز کے مطابق امیدواروں کی اہلیت کو جانچنے کیلئے جونیئر کلرک اور کمپیوٹر آپریٹر کیلئے علی الترتیب ٹائپنگ ٹیسٹ اور کمپیوٹر ٹیسٹ بذریعہ NTS لیا جائیگا۔ (ت) بنیادی تقرری کے ذریعے موزوں امیدواروں کے انتخاب کیلئے ٹوٹل 200 نمبرات کی درجہ ذیل طریقے سے تقسیم کی جائے گی۔
(1) سکریٹنگ ٹیسٹ جواز 3rd پارٹی (NTS) کرے گا = 100 نمبر (2) تالیبت 100 نمبر جس کی تقسیم مزید اس طرح ہوگی۔

تالیبت	تقسیمی تالیبت
ایس ایس سی	حاصل کردہ نمبر 30 x تقسیم کل نمبر
ایف اے / ایف ایس سی	حاصل کردہ نمبر 25 x تقسیم کل نمبر
بی اے الی ایس سی	حاصل کردہ نمبر 20 x تقسیم کل نمبر
ایم اے / ایم ایس سی	حاصل کردہ نمبر 10 x تقسیم کل نمبر
کمپیوٹر ڈپلومہ	حاصل کردہ نمبر 15 x تقسیم کل نمبر

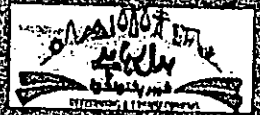
نوٹ:- (1) ہر امیدوار سے NTS کی درخواست فارم 300 روپے چارج کیا جائیگا۔
(2) تمام تقرریاں خالصتاً عارضی بنیادوں پر (Adhoc Based) کنٹریکٹ پر ایک سال کیلئے ہوں گی۔ (3) انٹرویو کے وقت اصلی تعلیمی اسناد بعد اصل شناختی کارڈ لانا لازمی ہے۔ (4) میرٹ پر آنے والے امیدواروں کی اسناد متعلقہ ادارے سے تصدیق کرائی جائے گی جس کے تمام اخراجات امیدوار کو برداشت کرنا ہوں گے۔ (5) انٹرویو کیلئے آنے والے امیدواروں کو کوئی ٹی اے ڈی اے نہیں دیا جائے گا۔ (6) صرف مقررہ وقت کے اندر موصول ہونے والی درخواستوں پر غور کیا جائیگا۔ (7) زبردستی کو اختیار حاصل ہے کہ وہ کوئی وجہ بتائے بغیر کسی بھی (تعلیمی) باجیڑی طور پر انٹرویو منسوخ کر دے۔ (8) اگر اس اشتہار کے بعد حکومت وقت کی طرف سے بہتر کی طرف سے مقررہ طریقہ کار میں تبدیلی کی گئی تو سلیکشن کمیٹی اس کے مطابق عمل کرنے کی پابند ہوگی (9) محکمہ انسپکشن آف ایڈیٹنگ ڈویژن ایجوکیشن کو اختیار حاصل ہوگا کہ وہ تمام خالی آسامیوں یا اس سے کم پر امیدوار بھرتی کرے (10) تمام تقرریاں حکومت خیر و خیر ختم ہونے کے مقرر کردہ قوانین و مجوزہ طریقہ کار کے مطابق خالصتاً میرٹ کی بنیاد پر ہوں گی (11) تمام تعلیمی اسناد صرف گورنمنٹ کے تسلیم شدہ اداروں کی قابل قبول ہوں گی (12) اگر کسی امیدوار کی اسناد جعلی پائے گئے تو اس کے خلاف قانونی چارہ جوئی کی جائے گی اور آئندہ کے لئے اسے سرکاری ملازمت کے لئے نا اہل تصور کیا جائے گا (13) نامکمل فارم یا معلومات کی صورت میں درخواست فارم خود بخود منسوخ تصور کیا جائے گا جس کے لئے کوئی اپیل منظور نہیں کی جائے گی (14) انٹرویو کیلئے الگ شیڈول جاری کیا جائے گا۔ (15) امیدوار کو کسی سکول میں سروس کرنا ہوگی جو کہ قابل تبادلہ ہوگی۔ (16) درخواست دینے کا طریقہ کار NTS کی ویب سائٹ پر موجود ہے۔

INF(P)4107

"SAY NO TO
CORRUPTION"

محمد انعام فور (Male) Muhammad Inam Foru

0923-9220228 نمبر





11 3

**OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALIS)
NOWSHERA**

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

NOTIFICATION/APPOINTMENT

Consequent upon the recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the vacant Junior Clerks posts in BPS-11 (Rs.10510-740-32710) @ Rs.10510/- fixed plus usual allowances as admissible under the rules on Adhoc basis on contract under the existing policy of the provincial Government, in non-Teaching Cadre on the terms & conditions given below in the interest of public service with effect from the date of their taking over charge.

OPEN MERIT

S N	NIS R.No.	Name of candidate	Father's Name	Address	Typing Speed WPM	Score	Place of Posting
01	572700529	Muhammad Usman (M.Com,DIT)	Ajmal Hussain	Moh; Shamilat Baba Jee Killi Kheshgi Bala Nowshera	27.75	136.44	GHS Bara Banda
02	602700270	Muhammad Yasir (BBA (Hon)/ DIT.	Zafran Ud Din	Near Hera Public School Kheshgi Bala P.O Kheshgi Payan NSR	33.33	129.61	GHS Islam Abad
03	602700497	Aurang Zeb (MBA (Finan)/DIT.	Gul Dad Khan	Vill;Ali Baig P.O Taru Jabba NSR	35.61	126.23	GHS Isandi Taza Din
04	572700342	Shafiullah (B.A)	Noor Ul Samad	Vill; Azakhel Bala (Dawood Zai) Nowshera	28.75	122.62	GHS Zara Miana
05	572700595	Muhammad Irfan (M.Sc (Comp; Science)	Muhammad Siddique	Vill; Khat Killi Moh; Rehmat Abad NSR	33.85	119.89	DEO (Male) Office Nowshera
06	572700800	Muhammad Irfan Mandori (B.A/DIT)	Mamraiz Khan	Moh; Mandori Vill;Kheshgi Bala P.O.Kheshgi Payan.	26.75	119.19	GHS Khairiari
07	602701099	Jawad Azeem (B.A/DIT).	Azeem Khan	Moh; Gari Zardad Vill; &P&O Akbar Pura Nowshera.	42.07	118.98	SDEO (Male) Tehsil Nowshera
08	572700255	Hazrat Hussain (B.A)	Shah Hussain	Moh; Hoti Khel Nowshera Kalan	41.91	117.16	GHS Jabbi
09	572700105	Sifatullah (B.A)	Farzand Ali	Moh.Battakzai Kheshgi Bala P.O Kheshgi Payan	30.5	117.04	GHS Darwazgai
10	572700553	Arshad Khan. M.A (Isl)	Hidayat Khan	Vill; Banda Sheikh Ismail Nowshera.	27	115.99	GHS Pir Pai

TERMS & CONDITIONS.

1. Appointments are purely on temporary & contract basis initially for one year.
2. NO TA/DA etc. is allowed for joining their posts.
3. Charge reports should be submitted to all concerned in duplicate.
4. They shall be governed by such rules and regulations as may be issued from time to time by the Govt.
5. Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
6. They should not be handed over charge if exceed, 35 years or below 18 years of age. Age relaxation case may be submitted to competent authority.

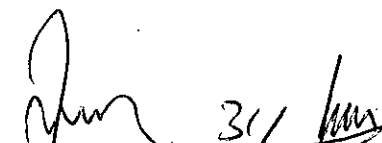
7. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO (M) Nowshera; and if anyone found to have produced bogus Certificate/Degree/Testimonials shall be reported to the law enforcing agencies for further action.
8. Their services are liable to be termination on one month's notice from either side. In case of resignation without prior notice his one-month pay/allowances shall be forfeited in favour of the Government.
9. The Pay of any appointee shall not be drawn /released by the DAO/DDO concerned until and unless a certificate to the effect by DEO (M) Nowshera is issued that their/his certificates/degrees/transcripts have been verified.
10. They should join their post within 30 days of the issuance of this notification. In case of failure to join the post within 30 days of the issuance of this notification, his appointment shall expire automatically and no subsequent appeal etc. shall be entertained.
11. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
12. Before handing over charge once again their documents must be checked and if they do not possess the required relevant qualifications as per rules/policy or they do not belong to the district, where they have been appointed in, they shall not be handed over charge of the post.

(Fayaz Hussain)
District Education Officer (M)
Nowshera

Enclst: No. 3276-78 / DEO (M)/NSR/ Etab; Secy/Apt; of J/Clerk/NTS/2016/Adhoc/ Dated Nowshera the
31 / 12 /2016.

Copy forwarded for information and necessary action to the: -

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commissioner Nowshera
3. District Accounts Officer Nowshera
4. Deputy District Education Officer (M) Nowshera
5. SDEO (M) Tehsil Nowshera
6. Principal/Headmasters schools concerned.
7. District Monitoring Officer (IMU) Nowshera.
8. Assistant Programmer (DEMIS) Local Office
9. Appointees Concerned.
10. Master File


District Education Officer (M)
Nowshera
31/12/2016

4



**OFFICE OF THE
DISTRICT EDUCATION OFFICER, (MALE),
NOWSHERA**

PHONE # 0923-9220228 , FAX # 0923-9220228

NOTIFICATION

Consequent upon the recommendations of the Departmental Promotion committee meeting held on 26-10-2018, and in Compliance with the order / direction of the Khyber Pakhtunkhwa Service Tribunal in service appeal No.304/2014(Execution Petition No.43/2018) dated 25-09-2018, and in pursuance of S.No: 09 of the notification issued by the Govt: of Khyber Pakhtunkhwa (E & S).Education department Notification No. SO (PE) 14-10/SSRC/Ministerial Staff/ 2013 dated: 28-01-2013, the following Class-IV employees are hereby promoted to the post of **Junior Clerk BPS-II (12570-880-38970)** 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 given below:-

S#	S.L No:	Name & Designation	Father's Name	Present Place of duty.	Posted as Junior Clerk B-II
01	01	Mr. Rahat Shah Lab: Attendant.	Mr. Bukhari Shah	GHSS Akbar Pura	GHSS, Pirpai Nowshera.
02	02	Mr. Munawar Shah Chowkidar	Rasool Shah	GHS Aza Khel Bala	GHSS, Khair Abad Nowshera.
03	03	Mr. Akhtar Munair Chowkidar	Adam Khan	GPS Dag Behsud	GHS, Palosi Payan Nowshera.

TERMS & CONDITIONS:

1. They shall be on probation for a period of one year extendable for another one year.
2. They should join their post within (15), fifteen days, of the issuance of this Notification.
3. They shall be governed by such rules and regulations may be issued time to time by the Government.
4. Charge report should be submitted to all concerned.
5. The DDO concerned will verify their documents before release of their pay; if documents were found bogus they will be terminated.
6. Necessary entries should be made in his /their service Book to the effect that if the said promotion was withdrawn due to the representation / appeal by any other senior eligible Candidate/or by the court, recovery of the monitory benefit, taken during the said period, will be recovered from the officials concerned.
7. No. TA/DA is allowed for joining their duty.
8. They will give 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.

(FAYAZ HUSSAIN)
District Education Officer, (Male)
Nowshera

Endstt: No. 13865-74 /DEO (M) NSR/EA-S/Prom: of Class-IV to J/C/2018. Dated Nowshera the 14 /11/2018

- Copy of the above is forwarded for information and necessary action to the:
1. Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar in Service Appeal No.304/2014.
 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 Department, 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.

District Education Officer, (Male)
Nowshera
11 / 11 / 2018

REVISED TENTATIVE SENIORITY LIST OF SSC PASSED CLASS 1V OF E/S EDUCATION (MALE) NOWSHERA
FOR PROMOTION OF 33% QUOTA TO JUNIOR CLERK.

change in/obtd in SSC

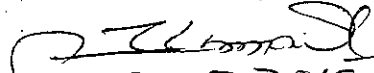
No.	Name of School/Office	Name & Designation	Father,s Name	Qualificat ion	Date of Birth	Date of 1st Apopt:	Date of Passing SSC	Date of Regular	Remarks	Cell: NO
1	GHS Akbar Pur	Rahat Shah Lab: Attendance	Bukhari Shah	SSC	14-09-1966 26.04.69	15-09-1984	31-12-1993 22.08.93	15-09-1984	14.09.89	0307-7120151
2	GHS Aza Khel Bala	Munawar Shah Chowkidar	Rasool Shah	SSC	10-10-1961	01-05-1986	15-08-1989	01-05-1986	02.05.86	3423170313
3	GHS Nizam Pur	Khalid Khan Naib Qasid	Hassan Khan	SSC	01-01-1968	28.10.87 19.10.1987	08.08.85	28.10.87	29.10.87	3005881274
4	GPS Dag Behsud	Akhtar Munair Chowkidar	Adam Khan	SSC	17-04-1972	19-10-1987	12-12-1991	19-10-1987	20.10.87	3219765256
5	GPS Mohib Banda	Wilayat Khan (Chowkidar)	Khan Sharif	FA (PTC)	05-08-1959	01-12-1987	21.12.91	21.12.91	01.12.87	0332-8944573
6	GHS Mughalki	Amresh Khan Lab: attendant	Muhammad Amin	SSC	10-02-1966	06.10.87	05.08.90	01.12-1987	01.12.87	03369851023
7	GPS Dag Behsud	Niaz Muhammad Chowkidar	Qadir Shah	SSC	28-09-1970 10.10.70	20-09-1988	28-07-1995	20-09-1988	14.2.88	3225088055
8	GPS No:2 Pabbi	Saeed Ullah Chowkidar	Mohabat Shah	SSC	10-04-1965	21-09-1988	24-01-1990	21-09-1988	27.9.88	3005895620
9	GPS Shams Abad	Ikram ul Haq Chowkidar	Yaqoob Khan	SSC	00-00-1968	15-10-1988	31-03-1988	15-10-1988	21.9.88	file not produced DPA
10	GPS No:1 Aza Khel Payan	Rang Wali shah Chowkidar	Abdul Ghafoor Shah	SSC	12-03-1967	06-11-1988	31-03-1987	06-11-1988	06.11.88	3150182894
11	GHS Aman Garh	Muhammad Ismail Lab: attenda	Sher Bahadar	SSC	14-05-1964	09-09-1989	30-12-1993	09-09-1989		Retired
12	GHS Badrashi	Mehrab Gul Naib Qasid	Ziarat Gul	SSC	01-04-1972	10-10-1989	31-12-1990	10-10-1989		
13	GPS Asha Khei	Mir Hider Chowkidar	Sadbar Gul	SSC	12-09-1973	20-12-1989	23.01.91	20-12-1989	11.10.89	0321-9083750
14	GPS No:3 Nowshera Cantt:	Haidar Ali Shah Chowkidar	Muzammil shah	SSC	14-08-1969	02-05-1990	28-07-1995	02-05-1990		301-3011694
15	GHS Taru jabba	Syed zahir shah Naib Qasid	Syed Usman shah	F.A	02-11-1972	01-07-1990	1990	01-07-1990	02.05.90	3427675746
16	GHS Mali Khel Bala	Saman Gul Lab: Att:	Farid Gul	MA Bed	05-03-1969	15-10-1990	31-01-1991	15-10-1990	01.7.90	3339045825
17	GPS Gul Rehnan Killi	Fazal Ahmad shah Chowkidar	Mazroob Sha	FA PTC	04-02-1959	05-11-1990	30-08-2003	05-11-1990	15.10.90	3149014933- 03430011524
18	GHS Hisar Tang	Mir Azam Khan Niab Qasid	saeed Ullah Khan	SSC	06-11-1969	04.11.90	04.08.05	01-01-1991	05.11.90	3068144124
19	GPS Sherkh Ahmad Baba	Noor slam Chowkidar	Muhammad Isma	SSC	20-03-1970	18-01-1991	00-00-1989	01-01-1991	01.08.91	3005342451
20	GPS Kandar	Muhammad Ibrahim Jan Chowk	Rahman Gul	FA Comp	04-04-1976	15-05-1991	31-03-1991	15-05-1991	01.08.91	2455195208 3339261089

30.12.93

16.5.91

370/850

21	GPS AC Centre	Riaz Amin Chowkidar	Hazrat Umar	SSC	19-05-1970	18-05-1991	31-12-1990	18-05-1991			
22	GSAAHS Dag Behsud	Zafar Iqbal Lab: Attendant	Musharif Khan	SSC	20-10-1973 01.08.75/sse cuts	21-10-1991	07-08-1993	21-10-1991	18.5.91	3005846208	376/850
23	GHS Manahi	Sardar Ali Naib Qasid	Hashim Khan	SSC	02-12-1968	20-02-1992	15-07-1984	20-02-1992	21.10.90		429/850
24	GHS Mulla Killi	Jan Alam Sweeper	Fazli Elahi	F.A	15-03-1964	31-05-1992	16-01-1980	31-05-1992	01.06.92	3449135285 3118321537	415/850


 07.05.2018
 Ismail Gul
 Principal
 GHS Bara Banda

25	GHSS Jalozai	Nowsherawan Lab: Att:	Sher Afzal	F.A	10-03-1970	01-07-1992	31-12-1991	01-07-1992	3118248368
26	GHSS Khesghi Payan	Abdur Rahim Niab Qasid	Raza Khan	B.A	09-10-1975	10-12-1992	00-00-1991	10-11-1992	33334584245
27	GHSS Khesghi Bela	Raees Khan Niab Qasid	Farid Khan	SSC	05-03-1975	11-12-1992	31-12-1992	11-12-1992	3459291617
28	GHS Pakari Katti Khel	Khial Nawab Chowkidar	Khana Din	SSC	16-01-1971	01-01-1993	04-08-1994	01-01-1993	3169006120
29	GMS Spin Kana Kalan	Walayat Khan Naib Qasid	Zarabat Khan	FA	05-09-1969	19-10-1993	00-00-1988	19-10-1993	3062526252
30	GMS Chowki Mamraz	Inam Ullah Naib Qasid	Faqir Muhammad	SSC	02-01-1977	19-10-1993	03-08-1993	19-10-1993	3139709463
31	GHSS No:2 Cantt	Habib ul Haq Beheshti	Fazal Ghani	SSC	15-02-1975	27-05-1994	19-02-1999	27-05-1994	3453724931
32	GPS Shaheen Abad	Muhammad Shabeer Chowkidar	Ustra Khan	FA/PTC	11-10-1975	31-08-1994	08-07-1993	31-08-1994	3433385730
33	GMS Kana Khel	Abdul Hanan Naib Qasid	Shamran Khan	F.A	01-01-1975	31-01-1995	02-08-1997	31-01-1995	3439014601
34	GHS Khat Killi	Syed Akmal Shah Naib Qasid	Shams ul Wahid	B.A	03-06-1961	01-08-1995	15-03-1988	01-08-1995	0346-5670351
35	GPS Namdar Khel	Shabeer Ud Din Chowkidar	Lal Din	SSC	01-07-1970	10-10-1995	01-01-1991	10-10-1995	
36	GPS No:2 Sheikhan	Noor Faraz Chowkidar	Baswar shah	SSC PTC	03-11-1974	20-10-1995	04-08-1994	20-10-1995	3008331895
37	GPS Rokhan Abad	Chaman Gul Chowkidar	Sameen Gul	FA	03-03-1970	01-11-1995	31-12-1986	01-11-1995	3005948407
38	GHSS Shaidu	Ameer Gul Sweeper	Habib Gul	SSC	07-08-1974	12-11-1996	31-12-1993	12-11-1996	
39	GMS AC Colony	Muhammad Abbas Niab Qasid	Muhammad Yousaf	SSC	13-03-1973	13-06-1997	00-00-1988	13-06-1997	3419760177
40	GMS Chowki Mamraz	Nizam Muhammad Beheshti	Maqbuli Khan	SSC	20-11-1978	06-08-1997	28-07-1996	06-08-1997	3129406832
41	GPS No:1 Akora	Nazeer Ahmad Chowkidar	Abdur Raziq	B.A	14-09-1969	26-01-1998	Sep-89	26-01-1998	
42	GHS Aman Garh	Asraf Ali Sweeper	Khidmat Ali	SSC	01-03-1967	17-02-1998	27-12-1986	17-02-1998	
43	GPS Abbas Abad	Muhammad Zubair Chowkidar	Syed Akbar Shah	SSC	01-01-1977	18-04-1998	20-06-2015	18-04-1998	
44	GHSS Khesghi Payan	Muhammad Asif Lab: Att:	Ghulam Muhammad	B.A PTC	08-05-1973	28-04-1998	00-00-1991	28-04-1998	3018190029
45	GHSS Khesghi Payan	Ibrahim Khan Lab: att:	Hamid Khan	M.A CT Be	03-01-1971	02-05-1998	00-00-1985	02-05-1998	3009046564
46	GHS Adamzai	Khan Muhammad Chowkidar	Mian Khan	SSC	09-11-1967	01-10-1998	08-08-1985	01-10-1998	310-9696265
47	GHSS Khesghi Payan	Abid Muhammad Naib Qasid	Fazal Muhammad	FA	02-03-1972	22-10-1998	31-12-1990	22-10-1998	3009046564
48	GSAAHS Dag Behsud	Anwar Khan Chowkidar	Muhammad Ilyas	SSC	03-03-1970	28-12-1998	11-08-1990	28-12-1998	
49	GHS Samandar Ghari	Shoukat Ali Lab: Attendant:	Gul Rehman	SSC DAE	30-12-1972	14-01-1999	00-00-1989	14-01-1999	
50	GMS Aza Khel Bela	Rabi Ullah (sweeper)	Zaman Khan	SSC	01-08-1972	01-03-1999	01-04-1989	01-03-1999	

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51	GHSS Manki Sharif	Muhammad Jenan Zaib Lab:Att:	Khawaja Iltaf Hussain	FA	11-09-1967	15-03-1999	00-00-1987	15-03-1999		3339188357
52	GPS Sohbat Kordona	Asad Ali Chowkidar	Noor Muhammad	B.A	05-02-1983	25-04-2001	31-12-1999	25-04-2001		3444342669
53	GHSS Rashakai	Zia ur Rahman Chowkidar	Gul Mast	F.A	24-05-1989	31-05-2001	22-11-2003	31-05-2001		3149445110
54	GHS Banda Sheikh Ismail	Naveed Khan Beheshti	Liaqat Ali	SSC	25-03-1983	01-12-2002	22-06-2000	01-12-2002		3115680092
55	GHS No: 1 Nowshera Cantt	Ihsan Ul Haq Naib Qasid	Irfan ul Haq	M.A M.Ed	15-04-1986	30-04-2004	13-12-2002	30-04-2004		300-5770919
56	G PS Pashtoon Ghari	Akbar Hussain Chowkidar	Fazli Akbar	SSC	02-02-1977	22-11-2004	31-12-1994	22-11-2004		3108340955
57	GPS Barhti Banda	Maqsood Ahmad Chowkidar	Safdar Khan	SSC	05-02-1986	21-02-2006	Apr-05	21-02-2006		
58	GPS Balu	Nabi Amin Chowkidar	Rooh-ul-Amin	SSC	19-04-1988	21-09-2006	15-12-2008	21-09-2006		
59	GHS Wazir ghari	Muhammad Ishfaq Chowkidar	Farid Ullah	SSC	21-03-1986	18-10-2006	16-06-2016	18-10-2006		
60	GPS Zando Banda	Wajid Ali (Chowkidar)	Sabz Ali	M.A (B.Ed)	01-04-1986	22-05-2007	02-01-2003	22-05-2007		0346-2623725
61	GPS No:2 Khudrazi	Saddam Hussain Chowkidar	Mumtaz Hussain	B.A	01-01-1990	15-07-2009	16-07-2008	15-07-2009		
62	GHS No: 1 Nowshera Cantt	Sher Azam Khan AWI	Abdul Azam Khan	B.A	03-03-1990	15-07-2009	31-12-2007	15-07-2009		346-8144703
63	GHSS Jallozai	Sahab Gul Chowkidar	Musarif Gul	SSC	14-08-1973	27-07-2009	31-12-2013	27-07-2009		3338282465
64	GSSSHSS Dak Ismail Khel	Muhammad Junaid Behishti	Muhammad Shah	FA PTC	15-03-1984	28-07-2009	31-03-2012	28-07-2009		3018904158
65	GHS Dheri Katti Khjel	Hamid Khan Lab:Attendent	Shakeel Ahmad	F.A	24-02-1984	30-07-2009	31-12-2001	30-07-2009		3324437834
66	GHS Manhi	Zakir Rehman Lab: Attendance	Shams ur Rehman	B.A	10-04-1991	30-07-2009	15-12-2007	30-07-2009		3003009048
67	GHS Khesghi Bala	Hayat Muhammad Sweeper	Nawab Khan	SSC	30-04-1978	01-08-2009	1998	01-08-2009		3139665041
68	GHS Misri Banda	Ayaz Ahmad Naib Qasid	Gul Zar Ahmad	SSC	25-12-1979	10-08-2009	20-06-2015	10-08-2009		3459309015
69	GMS bahadar Khel	Arshad Khan Naib Qasid	Gul Aban	B.A B.Ed	11-11-1973	15-08-2009	30-12-1993	15-08-2009		3479796014
70	GPS No:2 Babi Jadeed	Musa Khan Chowkidar	Nasar Ullah Khan	F.A	06-05-1974	17-08-2009	10-07-1991	17-08-2009		03148977204
71	GPS No:1 Akbar Pura	Sajjad Ahmad	Muhammad Islam	B.A	04-11-1982	26-08-2009	21-12-1997	26-08-2009		
72	GHS Pahari Katti Khel	Shamsh ul Hadi Beheshti	Shad Muhammad	SSC	01-09-1980	01-09-2009	05-07-2017	01-09-2009		3025836287
73	GPS No: 2 Akbar Pura	Muhammad Aftab	Muslim Muhammad	F.A	18-01-1984	01-10-2009	21-11-2000	01-09-2009		
74	GHS No 1 Nowshera Kalan	Hafiz Ul Amin	Ghulam Mustafa	FA	12-02-1980	02-09-2009	00-00-2007	02-09-2009		
75	GHSS No1 Nowshera Kalan	Hafizul Amin Mall	Ghulam Mustafa	FA	01-02-1980	10-09-2009	00-00-2006*	10-09-2009		
76	GPS No:3 Akbar Pura	Sajad Ali Chowkidar	Haleem Gul	SSC	13-01-1972	12-09-2009	01-07-1991	12-09-2009		

77	GPS Kandar Akbar Pura	Bashir Ahmad	Abdul JABBAR	SSC	03-06-1969	03-10-2009	01-07-1986	03-10-2009		
78	GHS Kheshgi Baia	Nasar Ullah Khan	Zareen Khan	B.A	05-04-1974	05-10-2009	1991	05-10-2009		3459291617
79	GPS Eidgah	Muhammad Waheed	Muhammad Saeed	B.A	06-02-1972	06-10-2009	Oct-89	06-10-2009		
80	GMS Kana Khel	Syed Jamal Shah Behishti	Syed Bukhari Shah	BA	02-02-1979	06-10-2009	00-00-1995	06-10-2009		3109794214
81	GHSS Kheshgi Payan	Shahid Khan Naib Qasid	Tasieem Khan	FA	04-03-1976	11-10-2009	31-12-1998	11-10-2009		3119053189
82	GPS No:2 Pabbi	Muhammad Ilyas	Yousaf Khan	F.A	01-09-1976	25-10-2009	28-07-1996	25-10-2009		
83	GPS No: 1 Nowshera Kalan	Muhammad Shakeel Baber Chowkidar	Muhammad Shafi	SSC	02-01-1974	31-12-2009	31-12-1990	31-12-2009		3219309692
84	GPS No:3 Jallozai	Ayaz Muhammad	Pir Muhammad	SSC	01-03-1977	22-01-2010	07-08-1993	22-01-2010		3102871863
85	GHS Jehangira Road	Sardar Mehar Dil	Zoor Ali	FA.PTC	04-08-1985	26-02-2010	12-06-2013	26-02-2010		3369483771
86	DEO (M) Office	Niamat Ullah Niab Qasid	Abdul Wakeel	B.A	04-12-1975	15-03-2010	00-00-1993	15-03-2010		3348927884
87	GPS Tootki	Hawalidar Shah Chowkidar	Alam Shah	FA	10-06-1975	27-03-2010	08-07-1993	27-03-2010	Disable	
88	GPS Gharib Pura	Qasim Khan Chowkidar	Muhammad Ikram Kh	SSC	12-02-1991	07-05-2010	16-07-2007	07-05-2010		
89	GPS Arif Abad	Fasih Urhman	Raza ali Khan	FA.PTC	15-01-1990	28-05-2010	07-11-2012	28-05-2010		3339004699
90	GPS Iraq Abad	Faseeh ur Rahman Chowkidar	Raza Ali	F.A	15-01-1990	28-05-2010	07-11-2012	28-05-2010		
91	GMS Aman Garh	Muhammad Zubair Naib Qasid	Saeed Akbar	FA	05-03-1986	31-05-2010	02-01-2003	31-05-2010		3009852111
92	GHS No: 1 Nowshera Cantt	Jamshaid Khan Sweeper	Gul Muhammad	SSC	03-06-1976	23-06-2010	31-12-1995	23-06-2010		0300-5863880
93	GPS Hassan Dara	Shabeer Ahmad Chowkidar	Abdul Nawaz	SSC	27-04-1974	28-06-2010	21-12-1991	28-06-2010		
94	GPS CCRI Pir Sabaq	Ilyas Ahmad Chowkidar	Muhammad Ishaq	B.A	07-12-1986	28-06-2010	31-12-2002	28-06-2010		3115578782
95	GPS No:5 Dag Behsud	Hidayat Shah Chowkidar	Bahadar Shah	SSC	20-08-1988	01-10-2010	18-06-2005	01-10-2010		3350994755
96	GPS Hameed Abad	Aman Ullah	Hameed Ullah Khan	SSC	20-04-1988	16-11-2010	08-11-2004	16-11-2010		
97	GHS Ali Baig	Falak Niaz Sweeper	Hikmat Khan	F.A	01-04-1974	17-01-2012	31-12-2014	17-01-2012		
98	GPS No:3 Ali Baig	Nasir Khan	Noor Muhammad	SSC	12-01-1985	23-01-2012	22-11-2003	23-01-2012		
99	GHS Kandi Teza Din	Rooh Ullah Sweeper	Mir Zaman	SSC	01-09-1979	26-01-2012	00-00-1999	26-01-2012		
100	GHS Adam Zai	Mustafa Behishti	Aslam Khan	SSC	23-04-1972	06-02-2012	00-00-1991	06-02-2012		
101	GHS Pabbi	Fawad Zaman	Gohar Zaman	FA	23-03-1993	14-05-2012	00-00-2011	14-05-2012		3159385572
102	GPS Barak abad	Arshad Khan Chowkidar	Khan Gul	SSC	09-01-1984	03-08-2012	18-06-2001	03-08-2012		

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103	GHSS Khesngi Payan	Arfan ullah Naib Qasid	Fazal Muhammad	F.A	12-09-1980	06-08-2012	1996	06-08-2012		3009046564
104	GPS Misal Khan Koroona	Shah Hussain : Chowkidar	Iraq Shah	B.A	25-03-1993	06-08-2012	13-12-2009	06-08-2012		3458714419
105	GHSS No1 Nowshera Kalan	Ahmad Ali Behishti	Muhammad Tahir Khan	FA	15-04-1988	07-08-2012	00-00-2006	07-08-2012		
106	GHS Aman Garh	Rehan Shah Lab: attendant	Kala Khan	F.A	03-01-1998	07-08-2012	01-08-1996	07-08-2012		
107	GSSSHSS Dak Ismail Khel	Qasir Ali Naib Qasid	Zar Ali	SSC	23-03-1987	18-10-2012	31-03-2014	18-10-2012		3025514367
108	GHSSSHSS Dak Ismail Khel	Qaisar Ali Naib Qasid	Zar Ali	SSC	23-03-1987	18-10-2012	31-03-2014	18-10-2012		
109	GPS Wazir Killi	Rasool Khan Chowkidar	AmbailKhan	SSC	06-06-1968	19-10-2012	31-08-1988	19-10-2012		3219753994
110	GHSS Jabbi	Muhammad Ikram Naib Qasid	Janab Gul	SSC	01-04-1976	21-11-2012	0-00-1993	21-11-2012		3078503949
111	GPS No 1 Jabbi	Qaisar Ali Chowkidar	Muhammad Ali	F.A/SSC	19-07-1989	26-09-2013	30-06-2005	26-09-2013		
112	GMS bahadar Khel	Zia Ullah Khan Khakroob	Nak Badshah	SSC	10-04-1995	27-10-2013	00-00-2012	27-10-2013		3108822685
113	GPS No: 2 Spin Khak	Hikayat Ali Chowkidar	Israf Khan	SSC	20-04-1992	13-11-2013	20-06-2012	13-11-2013		3059671371
114	GPS No:1 Taru Jabba	Ghareeb Ullah	Mian Gul	SSC	06-03-1988	08-02-2014	21-11-2005	08-02-2014		
115	GPS No: 1 Taru Jabba	Ghareeb Ullah	Mian Gul	SSC	06-03-1988	08-02-2014	21-11-2005	08-02-2014		
116	GPS No:1 Mera Wazir Ghari	Muhammad Saleem Chowkidar	Safeed Gul	SSC	26-03-1983	08-02-2014	01-06-1999	12-02-2014		3229124041
117	GPS Usman abad	Waris Khan Chowkidar	Gul Dar Khan	SSC	15-03-1984	28-04-2014	15-03-2003	28-04-2014		
118	GPS Tarkhel Payan	Kifayat Khan Chowkidar	Dilawar Khan	SSC	01-05-1994	28-04-2014	06-12-2012	28-04-2014		
119	GHS Misri Banda	Sher Rehman Sweeper	Rizwan Ullah	DAE	11-09-1995	28-04-2014	12-06-2012	28-04-2014		3239084499
120	GPS Khush Maqam	Nizam Ullah Chowkidar	Muhammad Zafran	F.Sc	20-07-1993	07-05-2014	11-06-2009	07-05-2014		
121	GHSS No:2 Cantt	Ronan Chowkidar	Feroz Khan	SSC	01-03-1993	12-05-2014	12-08-2015	12-05-2014		
122	GHSS No2 Nowshera Cantt	Roman Chowkidar	Feroz Khan	SSC	01.03.1993	02-05-2014	12-08-2014	12-08-2014		
123	GHSS Pir Pai	Iftikar Ali Behishti	Said ul Ibrar	SSC	09-03-1982	04-10-2014	29-08-2002	04-10-2014		
124	GPS Hazrat Abad	Sahar Gul Chowkidar	Habib Gul	SSC	03-02-1983	25-01-2015	00-00-2000	25-01-2015		
125	GHS Banda Sheikh Ismail	Anwar ul Haq N/Q	Janat Gul	SSC	02-05-1991	30-04-2015	11-06-2009	30-04-2015		3125625644
126	GPS Shawangi	Hayat Muhammad Chowkidar	Riaz Khan	SSC	12-03-1975	23-06-2015	08-04-1994	23-06-2015		
127	GPS No:2 Akbar Pura	Asghar Ali	Mir Hassan Khan	SSC	05-11-1972	25-06-2015	31-08-1989	25-06-2015		
128	GHSS Reshakai	Saleem Ullah	Wali Ullah	F.A	01-09-1983	27-06-2015	20-10-2006	27-06-2015		3465526166

129	GHSS Khesngi Payar	Usman Chowkidar	Akbar Ail	SSC	02-01-1995	09-07-2015	00-00-2012	09-07-2015		3481935770
130	GHS Mulla Killi	Hazrat Jamal (Chowkidar)	Jehangir Khan	SSC	02-04-1981	22-07-2015	23-07-1997	22-07-2015		3159173324
131	GPS No 1 Garu	Shahid Khan Chowkidar	Zulqadar Khan	SSC	13-07-1983	15-09-2015	23-02-2015	15-09-2015		
132	GPS Mali Khel Bala	Muhammad Shabeer Khan Chow	Jamroz Khan	SSC	16-08-1996	15-09-2015	12-06-2013	15-09-2015		
133	GPS Kandar Akbar Pura	Saeed Gul	Zafeer Gul	SSC	01-03-1980	06-10-2015	25-08-1998	06-10-2015		
134	GPS No 1 Kahi	Saeed Ullah Shah Chowkidar	Abdul Wadood	FA/PTC	18-10-1993	04-01-2016	16-06-2010	04-01-2016		
135	GHSS No1 Nowshera Kalan	Syed Sajid Ali Shah Chowkidar	Syed Manzor Ali shah	SSC	03-03-1985	05-01-2016	00-00-2005	05-01-2016		
136	GHS Pabbi	Mohsin Khan	Shahid Ali	SSC	09-09-1988	15-03-2016	00-00-2005	15-03-2016		3339192616
137	GPS Banda Sheikh Isamil	Israil shah	Mughal Shah	SSC	17-07-1975	28-03-2016	20-12-1996	28-03-2016		
138	GPS Aman Kot	Adalat Khan	Sher zada Khan	SSC	16-02-1975	30-03-2016	25-07-1992	30-03-2016		
139	GSSSHSS Dak Ismail Khel	Zakir Shah Naib Qasid	Masud Shah	SSC	01-01-1992	01-04-2016	00-00-2008	01-04-2016		3039425122
140	GPS ASC Colony	Khadim Hussain Chowkidar	Abdus Satar Khan	F.A	19-09-1992	16-06-2016	11-06-2009	16-06-2016		3015022808
141	GPS Zakhi Qabrisatn	Majeed Khan	Samar Gul	SSC	08-02-1981	Jun-16	28-07-1997	21-06-2016		
142	GMS Dak Ismail	Naeem Shah Sweeper	Said Wali Shah	SSC	05-10-1975	28-06-2016	00-00-1991	28-06-2016		3025544929
143	GSSSHSS Dak Ismail Khel	Haseeb Shah Chowkidar	Sardar Shah	SSC	18-04-1986	30-06-2016	31-03-2005	30-06-2016		3499018882
144	GSSSHSS Dak Ismail Khel	Muhammad Ibrahim Chowkidar	Adil Shah	SSC	03-02-1990	30-06-2016	00-00-2012	30-06-2016		3328905873
145	GPS No: 1 Chowki Drab	Khwaidda Khan	Abdul Ghafoor	SSC	01-01-1981	19-12-2016	27-12-1997	19-12-2016		
146	GPS No:2 Taru Jabba	Mian Faiz ur RHMAN	Mian Hidayat ur Rahn	SSC	14-03-1990	07-01-2017	15-07-2008	07-01-2017		
147	GPS No: 3 Akbar Pura	Muhammad Ikram Chowkidar	Muzaffar Khan	SSC	15-02-1979	17-02-017	04-03-2000	17-02-2017		
148	GHS Kandi Taza Din	Moneeb Ahmad Lab: Attendant	Barkat Shah	FA	25-01-1988	25-02-017	00-00-005	25-02-2017		
149	GMS Banda Malahan	Burhan ud Dun Naib Qasid	Siraj ud din	FA	14-04-1992	06-03-2017	17-03-2017	17-03-2017		3329087950
150	GPS ismail Khel	Ahmad Khan Chowkidar	Qalandar Khan	SSC	16-04-1978	24-06-2017	02-01-1996	24-06-2017		
151	GPS No.1 Nowshera Kalan	Shahid Khan Chowkidar	Banaras Khan	B.A	20-07-1994	24-06-2017	31-12-2011	24-06-2017		3155045008
152	GPS No 1 Mandori	Waqar Khan Chowkidar	Mir Jaffar Khan	SSC	07-04-1986	26-06-2017	14-01-2005	26-06-2017		
153	GPS Machi	Atiq Zaman Chowkidar	Malik Lal Said	FA	22-04-1979	29-06-2017	28-07-1995	29-06-2017		
154	GPS Kund	Mian Sajjad Ali Shah Chowkidar	Mian Khaliq Shah	SSC	29-10-1985	29-06-2017	21-11-2005	29-06-2017		

155	GSSSHSS Dak ismail-Khel	Muhammad Safeer Lab:Att:	Abdul Hadi	B.A Comp	17-06-1994	29-06-2017	00-00-2010	29-06-2017		3025514955
156	GPS Zekhi Char Bagh	Ameer Gul Sweeper	Ian Ali	F.A	20-07-1996	19-10-2017	23-07-2016	19-10-2017		
157	GHS Kandi Taza Din	Moneeb Ahmad Lab: Attendant		SSC						

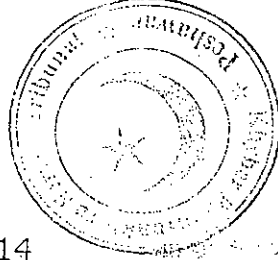
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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.



Appeal No. 1103 /2014

1136
03/09/2014

Mr. Muhammad Ibrahim Jan, Class-IV,
Government Primary School, Kandar,
Nowshera.

APPELLANT

VERSUS

1. The Secretary Education (E&SE), Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. The Director, Education (E&SE) Department, Peshawar.
3. The DEO (E&SE), (Male), Nowshera.
4. The Secretary, Finance Department, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.

RESPONDENTS

.....
APPEAL UNDER SECTION-4 OF THE KPK 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 TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT.

[Signature]
3/9/14

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 POST WITH ALL BACK CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS ALLEGED TRIBUNAL DEEMS FIT THAT MAY ALSO BE

TESTED
[Signature]

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M. Ishaq Jan vs Govt



1103/2014

27.10.2017

Counsel for the appellant and Mr. Kabeerullah Khalil, 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.

Announced
27.10.2017 SD/- Niaz Muhammad Khan,
Chairman

SD/- Ahmad Hassan
Member

Certified to be true copy
Khalid
Secretary

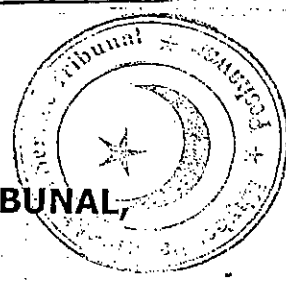
Date of Presentation of Application 06-11-17

Number of Pages 800

Number of Volumes 6

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P-5 A



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

Appeal No. 304 /2014

343
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.

And
4/3/14

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.

[Signature]

(16) (18)

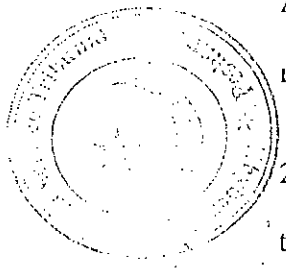
Appeal No. 304/2014, Abdus Rahim vs Govt

27.10.2017

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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.

(Ahmad Hassan) Member

(Niaz Muhammad Khan) Chairman

ANNOUNCED 27.10.2017

Certified true copy

Date of Presentation of Appeal 13-11-17
Name of Officer 800
Copies 6
Urgency 6

GA

M. Ishaq Jan vs Govt



1103/2014
27.10.2017

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.

Announced
27-10-2017 SD/- Niqaz Muhammad Khan,
Chairman

SD/- Ahmad Hassan
Member

Certified to be true copy
Signature
Date
Place
Peshawar

Date of Presentation of Application	06-11-17
Number of Words	800
Copying Fee	6
Urgent	2
Total	8
Name of Clerk	[Signature]
Date of []	06-11-17
Date of []	06-11-17



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 Daftari	Inayat Ullah	DEO (M) NSR	Junior Clerk at GHS, Ali Baig
02	Muhammad Ayaz Lab: Attend	Muhammad Sharif	GHSS, Khesghi 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. 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

Endst: 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: -

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

Deputy District Education Officer
(Male), Nowshera

NOTIFICATION

In compliance with the order/judgment by the Khyber Pakhtunkhwa Service Tribunal Peshawar vide civil appeal No. 104/2011, 323/2011 and 1237/2011, the following Class-IV employees of Ele: & Secy: Education Department District Nowshera are hereby promoted to the post of Junior Clerk BPS-07 (5800-320-15400) under 33% quota and posted to the offices/schools noted against their names subject to the terms and conditions below.

S. No	Name & Designation	Father's Name	Name of School	Promoted and Posted at:
01	Mr. Zahoor Jan Lab. Attendant	Fazal Muhammad	GHS, No. 01 Nowshera Kalan	Junior Clerk at GHS, No.01 Nowshera Kalan w.e.f. 13-02-2010
02	Mr. Iftikhar Ali Lab. Attendant	Habib ul Ghafoor	GHS, Wattar	Junior Clerk at GHS, Wattar; w.e.f:04-03-2010
03	Mr. Zahir Muhammad Naib Qasid	Zar Muhammad	GGMS, Khattak Building	Junior Clerk at GGHS, Manki Sharif w.e.f. 24-04-2012

TERMS & CONDITIONS

1. In case, they are already in Government service and working against pensionable post on regular basis before First day of July 2001, without any service break, allowed choice of option either to retain benefit of pension and gratuity as allowed to him under his previous terms of appointment or to avail the benefit of Contributory Provident Fund allowed to him under new appointment/promotion.
2. They should join their post within fifteen days of the issuance of this notification.
3. They would be on probation for period of One year extendable for another one year.
4. They will be governed by such rules and regulations as may be issued time to time by the Government.
5. Charge report should be submitted to all concerned.
6. The DDO concerned will verify their documents before release of pay.
7. Necessary entries to this effect should be made in their service books.
8. 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.

(Haji Hasanat Gul)

Executive District Officer
Elementary & Secondary Education
Nowshera

Endstt: No. 9044-52 /EDOE&SE NSR/J-Clerk /Estab. branch Dated: 22-06-2012.

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

1. Registrar, Service tribunal Khyber Pakhtunkhwa, Peshawar with reference to appeal No. 104/2011, 323/2011 and 1237/2011.
2. District Coordination Officer Nowshera.
3. Senior District Accounts Officer Nowshera.
4. Principals/Head Masters/Head Mistresses concerned.
5. District Officer (M&F) E&S Education Nowshera.
6. ADO Estt: Secondary (M) local office
7. Superintendent Estt: Branch (M) local office
8. Dealing Assistant Estt; Branch (M) local office
9. Officials Concerned.

H. Hasanat Gul
Executive District Officer
Elementary & Secondary Education
Nowshera

PRINCIPAL
GHS No 1
Nowshera Kalan

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 104/2011

Date of Institution. ... 22.1.2011
Date of Decision ... 11.1.2012



Mr. Zahoor Jan, Junior Clerk, Government High
School No.1, Nowshera Kalan...

(Appellant)

VERSUS

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

(Respondents)

APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR
GRANTING FULL MONITORY BENEFITS OF JUNIOR CLERK
GRADE AND SCALE SINCE 13.2.2010 TILL DATE AND
ONWARDS, AND FOR REGULAR PROMOTION TO JUNIOR
CLERK UNDER 33% QUOTA.

MR. MUHAMMAD ASIF YOUSAFZAI,
Advocate.

For appellant.

MR. TAHIR IQBAL,
Addl. Government Reader,

For respondents.

MR. SULTAN MAHMOOD KHATTAK,
MR. NOOR ALI KHAN,

MEMBER
MEMBER.

JUDGMENT

SULTAN MAHMOOD KHATTAK, MEMBER.- This appeal has been filed

by Zahoor Jan, the appellant, under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 for granting full monetary benefits of the post of Junior Clerk and since 13.2.2010 for regular promotion to Junior Clerk under 33% quota. It has been prayed that on acceptance of the appeal, the respondents may be directed to grant pay benefits of higher scale (Junior Clerk post) w.e.f. 13.2.2010 with all consequential benefits. The respondents may further be directed to consider the appellant for regular promotion to Junior Clerk post under 33% quota fixed by the Government.

EXHIBIT
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

TESTED

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2. Brief facts of the case are that the appellant joined the respondent department on 3.10.1993 as Laboratory Attendance. The appellant has more than 17 years service at his credit with qualification of M.A. He was adjusted against the post of Junior Clerk (BPS-7) in his own pay and scale, by the competent authority, vide order dated 13.2.2010. The Government of Khyber Pakhtunkhwa has fixed the 33% quota for Class-IV, having the qualification of SSC for promotion against the post of Junior Clerk but the appellant has not been considered for promotion till date. The appellant filed departmental appeal on 7.10.2010, which elicited no response within the statutory period, hence the present appeal.

3. The appeal was admitted to regular hearing on 22.3.2011 and notices were issued to the respondents for submission of written reply. Respondents have filed their joint written reply and contested the appeal. Rejoinder was also filed in rebuttal. Arguments heard and record perused.

4. The learned counsel for the appellant argued that the appellant was appointed as Laboratory Attendant on 3.10.1993, having the qualification of SSC. He further acquired qualification of M.A during service. Being highly qualified, the appellant was adjusted as Junior Clerk on 13.2.2010 in his own pay and scale instead of consideration on regular basis. Even without monetary benefits, which is against the verdict of august Supreme Court of Pakistan. Moreover, the Hon'ble Tribunal in Service Appeal No. 59/2006, decided on 15.6.2006 allowed monetary benefits in accordance with the law. So far as the question of seniority is concerned, it was the responsibility of the respondent department to issue seniority list on yearly basis. He stated that the matter pertains to terms and conditions of service of the appellant, this Tribunal has ample jurisdiction to entertain the present appeal. In this connection, the learned counsel for the appellant relied on PLD 2006 Supreme Court 246 (b). Counsel for the appellant referred to Service Appeal No. 1604/2010, decided on 21.1.2011, that this Hon'ble Tribunal has directed the respondents to consider the appellant for promotion with effect from the date junior to him were promoted. Moreover, cases of similar nature have already been decided in favour of the appellants in Service appeals No. 769/2008. Counsel for the appellant also produced copy of order No. 4235-39, dated 1.10.2009, whereby one Mr. Imad ud Din Naib Qasid holding diploma of "Associate Engineer" has been promoted against the vacant post of Junior Clerk against 33% quota which is junior to the appellant. He requested that the appeal may be accepted as prayed for.

5. The learned AGP argued that it is true that the appellant was adjusted as Junior Clerk on 13.2.2010 but in his own pay and scale. So he is not entitled to receive

ATTESTED
 EX-11
 Director, Government of Khyber Pakhtunkhwa
 Services Tribunal

salary of that post. Since the appellant has not been considered for regular promotion and will be considered on his turn on the basis of 33% quota reserved for promotion. Moreover, there is no record produced by the appellant which show that the appellant is most senior official in class-IV employees. He requested that the appeal may be dismissed.

6. The Tribunal observes that the respondents have never maintained any list pertaining to 33% quoted fixed for Class-IV employees and the respondents exercising pick and choose while promoting Class-IV employees to the post of Junior Clerk. The appellant has been posted as Junior Clerk in his own pay and scale and deprived of his promotion due to no valid reasons and improper exercise of discretion. As reported in PLD 2006 Supreme Court 246 (b) in case of depriving a civil servant of his legitimate right of promotion in an illegal manner and by improper exercise of discretion, this Tribunal has the jurisdiction under Section 4 (b) (i). The matter pertains to terms & conditions of service of the appellant which have been violated. The Tribunal further observes that the appellant has been made to work on higher post without benefits attached to that post which is violative of basic rights and according to the judgments of the august Supreme Court ^{as reported in the PLD 1994 Supreme Court 233 (d)} and this Tribunal judgment in Service Appeal No. 39/2006 dated 15.6.2006. the appellant is fully entitled to receive salary of that post. There were clear vacancies of Junior Clerk available in 33% quota which was never observed strictly in accordance with law and rules and keeping seniority positions of the Class-IV employees. The respondent No.2 has made order in own pay and scale basis instead of regular promotions which is against the law. One Mr. Imadud Din has been promoted which is junior to the appellant.

7. In view of the above, the appeal is accepted, and the respondent department is directed to consider the appellant alongwith others against the posts lying vacant in 33% promotion quota immediately from the date when vacancy was available for them within 90 days with all service benefits from that date. The appellant is also entitled to full pay benefits of the post of Junior Clerk post from the date of adjustment as Junior Clerk in own pay and scale. Parties are left to bear their own costs. File be consigned to the record.

8. This order will also dispose of connected Service Appeal No. 323/2011, Iftikhar Ali Versus DCO, Nowshera and others, in the same manner.

Sd/- Sultan Mahmood Warattah
Member
Sd/- Muz Ali Khan
Member

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Certified to be true copy

ANNOUNCED
11.1.2012.

(Signature)

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.

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,

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

ATTESTED

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

Sd/- Sultan Mahmood
Sd/- Rasheed Ullah

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EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 1237/2011

Date of Institution. ... 16.6.2011
Date of Institution. ... 24.4.2012



Mr. Zahir Muhammad, Naib Qasid,
1100 (E&S) Office, Nowshera.

(Appellant)

VERSUS.

1. The District Coordination Officer, Nowshera.
2. The EDO(E&S) Nowshera.
3. The Secretary, Government of Khyber Pakhtunkhwa,
Finance Department, 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 AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN 90 DAYS.

MR. MUHAMMAD ASIF YOUSAFZAI,
Advocate

For appellant

MR. ARSHAD ALAM,
Addl. Government Pleader

For respondents.

MR. NOOR ALI KHAN,
SYED MANZOOR ALI SHAH,

MEMBER
MEMBER

JUDGMENT

NOOR ALI KHAN, MEMBER: This appeal has been filed by Zahir Muhammad, the appellant with the prayer that on acceptance of the appeal, the respondents may be directed to consider him for promotion against the post of Junior Clerk under 33% quota fixed for matriculate Class-IV Civil Servants, from due date.

2. Brief facts of the case are that the appellant was appointed as Naib Qasid (BPS-1) by the competent authority on 30.12.1998. The appellant had already passed SSC examination in the year, 1997 and undergone typing and computer training in the year, 2003, copies attached. According to him he has been performing duties against the post of Diary/Dispatch Clerk. The government has fixed 33% quota for promotion to the post of Junior Clerk for all matriculate Class-IV government servants. Since a number of posts are lying vacant in the department

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

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25 (12)

the appellant submitted a departmental appeal on 26.2.2011, which elicited no response within the statutory period, hence the present appeal.

3. The appeal was admitted to regular hearing on 15.7.2011 and notices were issued to the respondents for submission of written reply. The respondents have filed their joint written reply and contested the appeal. Réjoinder 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 Naib Qasid on 30.12.1998. At the time of appointment, he was already in possession of SSC and presently performing his duties as Junior Clerk and having sufficient experience. He further argued that the appellant was eligible for promotion to the post of Junior Clerk under the rules and quota reserved for Class-IV civil servants. There were a number of posts lying vacant in the department, so the appellant filed departmental appeal for consideration against one of the posts from due date. The respondents were legally bound to observe 33% quota fixed by the provincial government but no action was taken on the departmental appeal, by the respondents. The learned counsel for the appellant stated that similar nature appeal No. 104/2011 has already been accepted by this Tribunal wherein the respondents were directed to consider the appellants, in the aforementioned appeals, against the posts lying vacant under 33% promotion quota immediately from the date when the vacancies were available for them. The appellant is also entitled to the same treatment as per judgment of the august Supreme Court of Pakistan as reported in 1996-SCMR-1185. There are more than 30 vacancies of Junior Clerk are available in the department and the appellant can be considered against one of the vacancy from the date of its availability for him under 33% quota. Moreover, Mr. Imdadud Din, Naib Qasid, junior to the appellant recruited and promoted on the same day. He requested that the appeal may be accepted as prayed for.

6. The learned AGP argued that promotion is not a vested right. The appellant will be considered for promotion against 33% quota in his own turn and he will not be discriminated. He further argued that every case has different nature and facts, and the case of appellant is not similar with the cases as referred to by the learned counsel for the appellant. He requested that the appeal may be dismissed.

ATTESTED



26 (13)

7. The Tribunal observes that the appellant was appointed as Naib Qasid (BPS-1) in the year, 1998. Since the appellant had already acquired qualification of SSC, worked on different seats of Junior Clerk and acquired sufficient experience. The Government of Khyber Pakhtunkhwa issued rules for appointment/promotion of different posts including the post of Junior Clerk. According to which for the post of Junior Clerk not less than sixty seven percent by initial recruitment; and (b) not less than thirty three percent by promotion from amongst Daftaries, Qasids, Naib Qasids and holders of equivalent posts who possess SSC Certificate or below forty five years of age and provided that where no official is available for promotion the vacancy may be filled by initial recruitment. As per rules ibid the appellant is entitled to be considered against one of the vacant posts under 33% quota from the date of availability. This Tribunal had already decided similar nature cases in Service Appeal No. 769/2008, decided on 30.1.2009 and 104/2011 decided on 11.1.2012 in favour of the appellants in the aforementioned appeals. The appellant is also entitled to the same treatment as per judgment of august Supreme Court of Pakistan as reported in 1996-SCMR-1185. The Tribunal agrees with the arguments put forth by the learned counsel for the appellant.

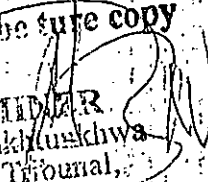
8. In view of the above, the appeal is accepted, and the respondent are directed to consider the appellant for promotion immediately against the post lying vacant in the department under 33% quota reserved for promotion of Class-IV civil servants from the date when the vacancy was available for him with all service benefits from that date. Parties are left to bear their own costs. File to be consigned to the record.

ANNOUNCED
24.4.2012.

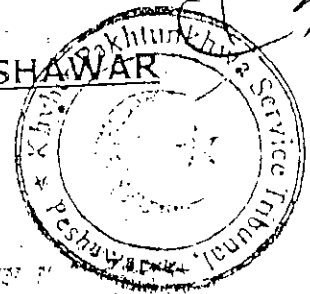

(SYED MANZOOR ALI SHAH)
MEMBER


(NOOR ALI KHAN)
MEMBER

Date of Presentation: 7.5.2012
Number of Volumes: 1220
Copying Fee: 8
Urgency: 2
Total: 10
Name of Copyist: [Signature]
Date of Completion: 7.5.2012
Date of Delivery of Copy: 7.5.2012

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EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, PESHAWAR



APPEAL NO. 321 /2012

329
Date 08/03/2012

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

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 TAKEN ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF 90 DAYS.

ADDITIONAL
PROVINCIAL SERVICE TRIBUNAL,
PESHAWAR

Certified true and correct copy

22.03.2013

Appellant with counsel, Mr. Arshad Alam, AGP with Muhammad Arshad, SO (delegation) and Muhammad Inam, 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

Date of Presentation of Application	1-4-2013
No. of Pages	4
No. of Exhibits	4
No. of Witnesses	2
No. of Counsel	6
Date of Disposal	1/1

28 / 14

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
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.

Certified to be true copy
22.03.2013
EX-11-11-11-11
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Appellant with counsel, Mr. Arshad Alam, AG 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*

Date of Presentation of Application 26-1-2015
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Name of Copyist [Signature]
Date of Circulation [Signature]

2010

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OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&SE)
NOWSHERA

OFFICE ORDER:

A committee is constituted of the following members under the Chairmanship of Mr. Ajmeer Shah, Principal GHS No. 2 Nowshera Kalan to retrieve office record from the dumped record ^{and was} and damaged by the July 2010 flood.

- 1) Mr. Ajmeer Shah, Principal GHS No. 2 Nowshera Kalan – Chairman
- 2) Mr. Nasruminallah, ADO, Establishment Local Office – Member
- 3) Mr. Muhammad Javed, Superintendent, Establishment Branch – Member
- 4) Any two class-IV's nominated by the Chairman

The committee is directed to workout its modalities and complete the task within one month time period positively.

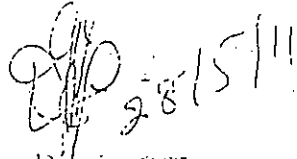
(Muhammad Uzair Ali)
Executive District Officer
(E&SE) Nowshera.

Endst: No. 1520-22

date 22 /5/2011

Copy to:

- PA to Directress (E&SE) Peshawar.
- District Officer (M) Nowshera.
- District Officer (F) Nowshera.


Executive District Officer
(E&SE) Nowshera.

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Office of the Executive District Officer
Elementary & Secondary Education
Camp Office (Khattak Building),
Nowshera.
No. 36-27 dated 16/8/10

To

The Audit Officer,
Camp Office,
Executive District Officer
Elementary & Secondary Education
Nowshera.

Subject:
Memo

Reply to the Audit Objections July 2010

As per para-wise Audit observations noted and communicated by the Audit Party July, 7th 2010 to July 27th 2010.
It is stated in your kind intimation that due to the torrential rains, flood in district Nowshera on 29-07-2010 update the relevant old record is completely damaged. The concerned dealing Assistants reported complete damage and inaccessibility to the record lying sunk in water since 29-07-2010 upto date.

District Officer
(M&F) Secondary
Elementary & Secondary Education
Nowshera.

It is stated that all record relating to this office is not accessible and the staff has been intimated in written vide no 003 dated 03-08-2010 to make access to the record, so based on the reports of the concerned dealing assistants DO(M&F) and DDO's (M&F) Primary and Secondary, major record of the office has been damaged due to lying sunk in flood water since 29-07-2010 update submitted for further necessary action please. Moreover the above statement of the DDO's is hereby endorsed and countersigned.

Encl: Even No. & Date

Copy of the above is forwarded to the:-

1. Copy to all concerned.
2. Office Copy.

H. ...
Executive District Officer
Elementary & Secondary Education
Nowshera.

Attested
[Signature]
D.O. (M) (E&SE)
Nowshera

10 August 2010

Office Of The Principal GHS No.2 Nowshera Kalan.
Ref: No.50 Date:27-06-2011

To
The Executive District Officer,
Elementary & Secondary Education,
Nowshera.

Subject: Retrieval Of The Office Record

Respected Sir,

Kindly reference your Office order No.1520-22 dated 28-05-2011, the undersigned along with the following members of the committee, worked hard to retrieve useful record out of the dumps record damaged by the Flood 2010. The record is lying scattered in various places within the premises of the Office.

It is submitted in your honor that all of our efforts went futile exercise because the muddy water has splattered the documents like glue. All the record is spoiled completely. Nothing could be found in proper condition. A few worth mentioning documents like service books, cash books and stock register came to our hand but unfortunately all of these are not in such a position to read vividly. List of these documents is attached herewith.

The report is submitted for necessary action please.

- 1) Mr.Nasrminallah, ADO, Establishment Local Office-Member
- 2) Mr.Muhammad Javed, Superintendent-do
- 3) Mr.Misal Khan class-IV -do
- 4) Mr.Muhammad Qasim class-IV GHS No. Nsr Kalan.

Ajmeer Shah
AJMEER SHAH (Chairman)
Principal GHS No.2 Nsr Kalan
PRINCIPAL
Govt. High School No. 2
Nowshera Kalan

DISTRICT GOVERNMENT, NOWSHERA.
D.C.O., SECRETARIAT.

No. 9460 /DCO/AO//NSR/Flood.

Dated Nowshera the 14 /12/2010.

J 32
TO

The Secretary,
Finance Department,
Govt. of Khyber Pakhtunkhwa,
Peshawar.

Subject:- DAC MEETING FOR THE FINANCIAL YEAR 200910.

Please refer to Regional Director Audit (District Govt.) Peshawar letter No.F/Audit/DAC Nowshera/2009-10/10551 dated 05.11.2010 in reply to this office letter No.7531/DCO/AO//NSR/Flood-2010 dated 20.10.2010 on the subject noted above (both copies attached).

Nowshera had been devastated by the flood of the millenia and almost all the Government Offices and Schools building were badly damaged or destroyed and the Office equipments, furnitures along with all the previous accounts record were fully washed away.

How the Director General Audit Govt. of Khyber Pakhtunkhwa has directed the District Government for convening DAC meeting for discussion of the previous audit paras.

All the Offices i.e. Health, Education, C & W, DCO, Office have shown their inability for making preparation for the DAC meeting as no relevant accounts, reference record is available with them.

This matter was also taken with Director General Audit District Govt. for guidance, but this office was directed to obtain guidance from the Finance Department Khyber Pakhtunkhwa.

So, it is requested that this office may please be guided as to how the replies to the Audit Paras be prepared when no reference record is available.

District Coordination Officer,
Nowshera.

**BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA PESHAWAR**

C.M # _____/2019

In COC # 41/2018/1

In S.A # 305/2014

*To come up w/
E.P. on the date
already fixed.
Di. 16/9/19*

*Put up to the court with
relevant appeal.*

Ibrahim Khan & others

Versus

Readers Education Department, Khyber Pakhtunkhwa

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Ibrahim Khan
Petitioner

Through *G.A.*
Gohar Ali Khweshgi
Advocates, High Court
Peshawar

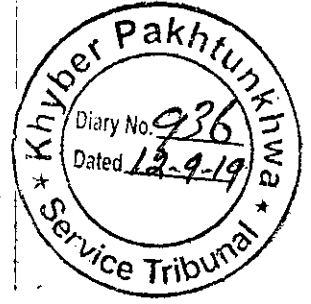
Dated: 12/09/2019

**BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA PESHAWAR**

C.M # _____/2019

In COC # 4/2018 /

In S.A # 305/2014 -



Ibrahim Khan & others

Versus

Education Department, Khyber Pakhtunkhwa

**APPLICATION FOR EARLY HEARING OF
DATE OR OTHER CASE MIR HAIDER VS.
EDUCATION DEPARTMENT BE FIXED
TOGETHER AS IDENTICAL FOR
APPEARING / HEARING**

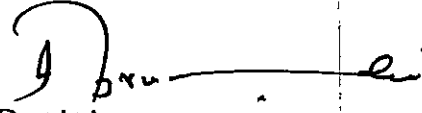
Respectfully Sheweth,

The appellate submit as under :-


1. That the appeal is fixed before this Hon'ble Tribunal as title above in which the next date of hearing is 25.09.2019.
2. That the other case of Mir Haider vs Government of Khyber Pakhtunkhwa is fixed on 24.09.2019.
3. That both the case (A) Mir Haider vs Government of Khyber Pakhtunkhwa dated 24.09.2019 and (B)

Ibrahim Khan and others vs Education Department 25.09.2019 as in execution of one judgment needs be fixed on 25.09.2019 or later on, as legal requirements.

It is, therefore, most humbly prayed that date of hearing of both the cases be fixed on 25th September 2019 please.


Petitioner

Through


Gohar Ali Khweshgi
Advocates, High Court
Peshawar.

Dated: 12/09/2019

**BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA PESHAWAR**

C.M # _____/2019

In COC # 41/2018/1

In S.A # 305/2014

Ibrahim Khan & others

Versus

Education Department, Khyber Pakhtunkhwa


AFFIDAVIT

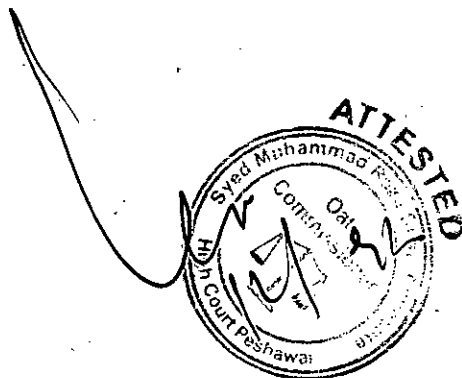
I, Ibrahim Khan, R/o Mohallah Afghania, Khweshgi Payan, Tehsil & District Nowshera do hereby solemnly affirm and declare on oath that the contents of this application are true and correct to the best my knowledge and belief and nothing has been concealed from this honorable Tribunal.


Deponent

CNIC # 17201-0982171-5

Identified By:-


Gohar Ali Khweshgi
Advocate, HIGH Court
Peshawar



**BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA PESHAWAR**

C.M # _____/2019

In COC # 41/2018/1

In S.A # 305/2014

Ibrahim Khan & others


Versus

Education Department, Khyber Pakhtunkhwa

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Petitioner

Through 

Gohar Ali Khweshgi
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Peshawar

Dated: 12/09/2019

**BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA PESHAWAR**

C.M # _____/2019

In COC # 41/2018/1

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Ibrahim Khan & others

Versus

Education Department, Khyber Pakhtunkhwa

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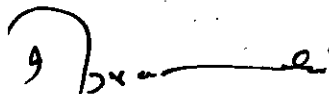
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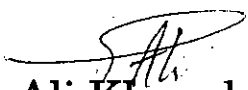
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Ibrahim Khan & others

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Education Department, Khyber Pakhtunkhwa


AFFIDAVIT

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