

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

C.M. NO. \_\_\_\_\_/2023

IN

Service Appeal No. 226 /2023

MUHAMMAD HAMAYUN

V/S

EDUCATION DEPTT:

**INDEX**

S. NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Application with affidavit	.....	1
2.	Copy of relevant documents	"A"	2-9

Dated 13/3/23

APPLICANT/APELLANT  
MUHAMMAD HAMAYUN

Through:

  
**NOOR MOHAMMAD KHATTAK**  
Advocate Supreme Court.

-1-

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

C.M. NO. \_\_\_\_\_/2023  
IN  
Service Appeal No. 226 /2023

Khyber Pakhtunkhwa  
Service Tribunal  
Diary No. 4238  
Dated 13/3/2023

MUHAMMAD HAMAYUN V/S EDUCATION DEPTT:


**APPLICATION FOR PLACING ON FILE NECESSARY DOCUMENTS IN THE ABOVE TITLE SERVICE APPEAL**

Respectfully Sheweth:

1. That the above title service appeal is pending adjudication before this Honourable Tribunal which has been fixed for hearing on 13.03.2023.
2. That there are some necessary documents that needs to be place on file for the just and fair decision in the above titled service appeal. Copy of Additional Documents are attached as **Annexure ..... A.**
3. That any other grounds and proof with regard to the additional documents would be raised at the time of argument with prior permission of this Honourable Tribunal.

It is, therefore, most humbly prayed that on acceptance of this application on behalf of the appellant the additional documents may be placed on file, for just and proper decision of the above mentioned service appeal.

Dated 13/3/23

  
APPLICANT/APPELLANT  
MUHAMMAD HAMAYUN

Through:

  
**NOOR MOHAMMAD KHATTAK**  
Advocate Supreme Court.

**AFFIDAVIT**

I, **Muhammad Hamayun** (the Applicant/Appellant) do hereby solemnly affirm and declare on Oath that the contents of this **Application** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

  
**DEPONENT**

App No. Name with Father's Name D.O.B./M/Ag

5211 - Sheer Zaman S/O Mawaz Khan

20.04.79/30.43.02

581/1100 1996  
 265/550 1998  
 582/1000 2005  
1398/2650 15.82-16

Quali: M.A (Islamiat) 2002  
 Experience: C.T. PTC Since 31.05.2002  
 Ed For: Nil

5203 Anwar Ali S/O Muhammad Sabib

01.02.76/33.02.15

584/1100 1996 Supply  
 263/550 2000 In Paris  
 518/1000 2006  
1365/2650 15.45-2=13

Quali: M.A (Islamiat) 2005 M.Ed in 2009  
 Experience: PST Since 08.03.1995  
 Ed For: Nil

52406 Muhammad Hamayun S/O Salam Gul

02.02.73/36.05.15

503/1100 1991  
 250/550 1998  
 678/1000 2000  
1413/2650 16.20=16

Quali: M.A (Pak Study) 2003  
 Experience: PSJ Since 12.10.1995  
 Ed For: Nil

5229 Farman Ullah S/O Dilakash Khan

19.04.76/33.02.15 F.R.B. mda. 1

577/1100 1995  
 282/550 1997  
 583/1000 2002  
1442/2650 16.32=16

Quali: M.A (Pol Science) 2000  
 Experience: SET Since 2003 to 04.2009

## IN EDUCATION DEPARTMENT VIDE ADVT NO. 05/2009

No	App No	Name with Father's Name	DO Birth/ Age	Domicile Zone
01	5211	Sher Zaman S/o Maweez Khan	20.4.79/30.05.0	Khyber 1
Qualification F.SC                    551/1100                    1996 B.SC                    265/550                    1998 B.ED                    582/1000                    2005 <u>1398/2650</u> <u>15.82x16</u> Addl Qual                M.A (Islamiat) 2002 Experience:              C.T PTC Since 31.05.2002 Applied for.              Nil				
02	5203	Anwar Ali S/o Muhammad Sahib	01.02.76/ 33.05.03	Buner 3
Qualification F.SC                    584/1100                    1996 Supply B.SC                    263/550                    2000 in Parts B.ED                    518/1000                    2006 <u>1365/2650</u> <u>15.45-2=13</u> Addl Qual                M.A (Islamiat) 2005 M.Ed in 2009 Experience:              PST Since 08.03.1995 Applied for.              Nil				
03	406	Muhammad Hamayun S/o Salam Gul	02.02.73 /36.05.02	Karak 4
Qualification F.SC                    503/1100                    1991 B.SC 364/800            250/550                    1998 B.ED 813/1200        678/1000                    2000 <u>1413/2650</u> <u>16.20=16</u> Addl Qual                M.A (Pak Study ) 2003 Experience:              PST Since 12.10.1995 Applied for.              Nil				
04	5229	Farman Ullah S/o Dilakash Khan	19.04.76/33.02.15	FR Bannu 1
Qualification F.SC                    577/1100                    1995 B.SC                    282/550                    1997 B.ED                    583/1000                    2002 <u>1442/2650</u> <u>16.32=16</u> Addl Qual                M.A (Pol Science ) 2000 Experience:              SET Since 2003 to 04.2009 Applied for.              Nil				

ASSESSMENT AT VIVA VOCE TEST

-3-

Assistant District Officer (H 16)

(1) Vack...

AWR

(iv) Time: 0900 hours

(2) Date: 23/12

Candidate's Serial No.

	1	2	3	4	5	6	7	8	9	10
	16	15	16	16	17	14	17	16		
Points deduction	-	2	-	-	-	1	1	1		
	16	13	16	16	17	13	16	15	14	13
Part A 05 Marks	02	03	02	02	05	02	02	03	04	03
Part B 05 Marks										
Part C 10 Marks	-	-	04	01	-	02	-	04	04	-
	02	03	06	03	05	04	02	07	08	03
Total / 60 Marks	20	20	42	25	38	33	33	35	38	32
Part A + B + C	F	F	64	F	60	60	57	57	60	F

## NWFP PUBLIC SERVICE COMMISSION

Assessment at VIVA VOCE Test

Male Assistant District Officer (B-16

(ii) Vacancies 241

Peshawar

iv Time: 0900 Hours

V Date 24.06.2010

Candidate's Serial Number

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Marks														
Rating														
Annual attempts deduction	16	15	16	16	17	14	17	16	15	15	15			
	-	2	-	-	-	1	1	1	1	2	2			
A	16	13	16	16	17	13	16	15	14	13	13			
Zonal Relevant 05 Marks	02	03	02	02	05	02	02	03	04	03	02			
Vacations/ Qualifications														
/ 05 Marks UI Quran														
Refernece 10 Marks	-	-	04	01	-	02	-	04	04	-	-			
	02	03	06	03	05	04	02	07	08	03	02			
Test 50/60 Marks	20	20	42	25	38	33	33	35	38	38	A			
Total Part A+B+C	F	F	64	F	60	50	51	57	60	A	F			



-9-

**GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

Dated Peshawar the October 29, 2018.

**NOTIFICATION**

**NO.SO(SME&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17):**

Consequent upon their promotion to the post of Sub-Divisional Education Officer Male (BS-17) vide notification of even number dated 26.09.2018, the following SDEOs are hereby posted/adjusted on the posts & stations as mentioned against each:

S#	Name of candidate	Posted as
1	Mr. Zia Ullah	Assistant Director (BS-17), Directorate of E&SE
2	Mr. Shah Jehan Khan	Assistant Director (BS-17), Directorate of E&SE
3	Mr. Muhammad Arshad	Assistant Director (BS-17), Directorate of E&SE
4	Mr. Irshad Khan	SDEO (BS-17) Town-IV Peshawar
5	Mr. Muhammad Zahid Khan	Assistant Director (BS-17), Directorate of E&SE
6	Mr. Muhammad Sohail Khan	Assistant Director (BS-17), Directorate of E&SE
7	Mr. Muhammad Aftab	Assistant Director (BS-17), Directorate of E&SE
8	Mr. Imtiaz Khan	SDEO (BS-17) Swat
9	Mr. Muhammad Saleem	SDEO (BS-17) Pabbi Nowshera
10	Mr. Shams-ul-Islam Niaz	SDEO (BS-17) Kabal Swat
11	Mr. Muhammad Zubair	SDEO (BS-17) Takhtbai Mardan
12	Mr. Hayat Khan	Assistant Director (BS-17), Directorate of E&SE
13	Mr. Ahmad Ullah	SDEO (BS-17) Shabqadar
14	Mr. Muhammad Anwar	SDEO (BS-17) Mardan
15	Mr. Fazl-e-Khuda	SDEO (BS-17) Khadokhel Buner
16	Mr. Amir Badshah	SDEO (BS-17) Mandan Buner
17	Mr. Fida Muhammad	SDEO (BS-17) Town-III Peshawar
18	Mr. Salih Muhammad	SDEO (BS-17) Daggar Buner
19	Mr. Abdul Wahab	SDEO (BS-17) Lahore Swabi
20	Mr. Muhammad Abid	SDEO (BS-17) Rajjar Swabi
21	Mr. Adil Muhammad	SDEO (BS-17) Kailang Mardan
22	Mr. Niaz Wali Khan	SDEO (BS-17) Ghazi Haripur

*Arif*



5

**GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

23	Mr. Mehboob Elahi	Assistant Director (BS-17), Directorate of E&SE
24	Mr. Shehzad Nadeem	SDEO (BS-17) Darosh Chitral
25	Mr. Muhammad Farooq	SDEO (BS-17) Karak
26	Mr. Dil Nawaz	SDEO (BS-17) Kohistan
27	Mr. Gul Faraz	SDEO (BS-17) Bahrain Swat
28	Mr. Muhammad Humayun	SDEO (BS-17) Dnraban D.I. Khan
29	Mr. Abdul Qayum Khan	Assistant Director (BS-17), Directorate of E&SE
30	Mr. Istikhar Ahmed	SDEO (BS-17) Battagram
31	Mr. Chanzeb	SDEO (BS-17) Alai Battagram
32	Mr. Sharafat Khan	SDEO (BS-17) Bisham Shangla
33	Mr. Mehmood Iqbal	SDEO (BS-17) Paharpur D.I. Khan
34	Mr. Khalid Naseem	SDEO (BS-17) Prova D.I. Khan
35	Mr. Muhammad Zarif	SDEO (BS-17) D.I. Khan
36	Mr. Muhammad Irshad	SDEO (BS-17) Tall Hangu
37	Mr. Muhammad Rehman Shah	SDEO (BS-17) Bakka Khel Bannu
38	Mr. Waheed Ullah Shah	SDEO (BS-17) Domel Bannu
39	Mr. Muhammad Tariq	Assistant Director (BS-17), Directorate of E&SE
40	Mr. Hamid Rasool	SDEO (BS-17) Bannu
41	Mr. Ali Haider	SDEO (BS-17) Samar Bagh Dir Lower
42	Mr. Muhammad Raza Shah	SDEO (BS-17) Adenzai Dir Lower
43	Mr. Muhammad Islam	SDEO (BS-17) Munda Dir Lower
44	Mr. Muhammad Ajmal	SDEO (BS-17) Oghi Manshira
45	Mr. Shafiq Ur Rehman	SDEO (BS-17) Darban Manshira
46	Mr. Races Ur rehman	Assistant Director (BS-17), Directorate of E&SE
47	Mr. Abdus Samad	SDEO (BS-17) Baffa Manshira
48	Mr. Raja Babu Jehangir	Assistant Director (BS-17), Directorate of E&SE
49	Mr. Shams Ur Rehman	SDEO (BS-17) Balakot Manshira
50	Mr. Abdur Rehman Rashid	SDEO (BS-17) Serai Naurang Lakki Marwat
51	Mr. Qadir Shah	SDEO (BS-17) Lakki Marwat
52	Mr. Habib Ur Rehman	SDEO (BS-17) Kulachi D.I. Khan

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- 6 -

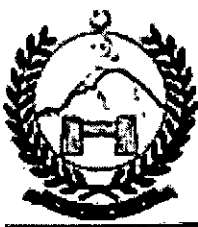
**GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

53	Mr. Hameed Ullah	SDEO (BS-17) Palas Kohistan
54	Mr. Muhammad Azam	SDEO (BS-17) Sedu Sharif Swat
55	Mr. Ghulam Sarwar	SDEO (BS-17) Balambat Dir Lower
56	Mr. Ghulam Habib	SDEO (BS-17) Dir Lower
57	Syed Atta Ullah Shah	Assistant Director (BS-17), Directorate of E&SE
58	Mr. Rases Khan	SDEO (BS-17) Matta Swat
59	Mr. Love Dan	SDEO (BS-17) Sheringal Dir Upper

**CONSEQUENTIAL TRANSFER**

S.No	Name of candidate	Posted as
60	Mr. Muhammad Arif, SS (Economics) BS-17 working as SDEO (M) Town-IV	SS (Economics) BS-17 GHSS Nizampur, Nowshera
61	Mr. Ghazi Bacha SS (Maths) BS-17 working as SDEO (M), Lahore Swabi	SS (Maths) BS-17 GHSS Kabgani, Swabi
62	Mr. Wisal Muhammad HM BS-17 working as SDEO (M) Katlang Mardan	HM BS-17 GHS Sohbat Abad, Mardan
63	Mr. Abdul Haleem SS (Islamiat) BS-17 working as SDEO (M) Mardan	SS (Islamiat) BS-17 GHSS Gujar Garhi, Mardan
64	Syed Arshad Hussain Shah SS (English) BS-17 working as SDEO (M) Takht Bhai, Mardan	Instructor (BS-17) RITE (Male) Mardan
65	Mr. Fazle Khaliq SS (English) BS-17 working as SDEO (M) Saidu Sharif, Swat	SS (English) BS-17 GHSS Miandam, Swat
66	Mr. Inyat Ullah HM BS-17 working as SDEO (M) Matta Swat	HM BS-17 GHS Sambat Swat
67	Mr. Inyat Ullah HM BS-17 working as SDEO (M) Charbagh Swat	HM BS-17 GHS Manpatai Swat
68	Mr. Liaqat Ali HM BS-17 working as SDEO (M) Khawaza Khela Swat	HM BS-17 GHS Laikot Swat
69	Mr. Majeed Ullah HM BS-17 working as SDEO (M) Kabal Swat	HM BS-17 GHS Ghalooch Swat
70	Mr. Muhammad Zahid SS (Statistics) BS-17 working as SDEO (M) Pura Shangla	SS (Statistics) BS-17 GHSS Butyal Shangla

*[Handwritten Signature]*



-7-

**GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

71	Mr. Muhammad Pervez DPE BS-17 working as SDEO (M) Shangla	DPE BS-17 GHSS Olandar Shangla
72	Mr. Akhtar Naeem SS (Urdu) BS-17 working as SDEO (M) Basham, Shangla	SS (Urdu) BS-17 GHSS Shahpur Shangla
73	Mr. Rehman Ul Mulk SS (Pak- Study) BS-17 working as SDEO (M) Lal Qilla, Dir Lower	SS (Pak-Study) BS-17 GHSS Akhagaram Dir Upper
74	Mr. Sadiq Jan SS (Urdu) BS-17 working as SDEO (M) Balambat Dir Lower	SS (Urdu) BS-17 GHSS Pachakulay Dir Upper
75	Mr. Hameed Ur Rehman HM BS-17 working as SDEO (M) Samar Bagh Dir Lower	HM BS-17 GHS Kumber Dir Lower
76	Mr. Raza Shah ADEO BS-16 working as SDEO (M) Munda Dir Lower	Services placed at the disposal of Directorate E&SE KPK
77	Mr. Muhammad Zafar HM BS-17 working as SDEO (M) Temergrah Dir	HM BS-17 GHS Badin Dir Lower
78	Mr. Mehboob Ur Rab SST BS- 16 working as SDEO (M) Sheringal Dir Upper	Services placed at the disposal of DEO (M) Dir Upper
79	Mr. Habib Ullah, HM BS-17 working as SDEO (M) Laachi Kohat	HM BS-17 GHS Pakka Topi, Kohat
80	Mr. Muhammad Naeem Shah HM BS-17 working as SDEO (M) Tall Hangu	HM BS-17 GHS Sarozai Hangu
81	Mr. Tariq Javed SS (Chemistry) BS-17 working as SDEO (M) D.I. Khan	SS (Chemistry) BS-17 GHSS Darban Kalan, D.I. Khan
82	Mr. Mirza Khan SS (English) BS-17 working as SDEO (M) Phar Pur D.I. Khan	SS (English) BS-17 GHSS Abdul Kkhel D.I. Khan
83	Mr. Zain Ullah Khan SS (Chemistry) BS-17 working as SDEO (M) Prova D.I. Khan	SS (Chemistry) BS-17 GHSS No.2 D.I. Khan
84	Mr. Muhammad Khalid HM BS-17 working as SDEO (M) Kulachi D.I. Khan	HM BS-17 GHS Budd D.I. Khan
85	Mr. Saif Ul Malook HM BS-17 working as SDEO (M) Palas Kohistan	HM BS-17 GHS Shore Kot Kohistan
86	Mr. Muhammad Nawab SST BS-16 working as SDEO (M) Pattan, Kohistan	Services placed at disposal of DEO (M) Kohistan

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**GOVERNMENT OF  
KHYBER PAKHTUNKHWA - 8-  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

87	Mr. Fazal Qayum SS (Pashto) BS-17 working as SDEO (M) Kohistan	SS (Pashto) BS-17 GHSS Sakhara, Swat
88	Mr. Abdur Rauf SS (Urdu) BS-17 working as SDEO (M) Khudo Khail, Buner	SS(Urdu) BS-17 GHSS Nogram, Buner
89	Mr. Ikhtiyar Ahmed SS (English) BS-17 working as SDEO (M) Mandan Buner	SS (English) BS-17 GHSS Agarai, Buner
90	Mr. Bakht Sher Hussain HM BS-17 working as SDEO (M) Gagara Buner	HM BS-17 GHS Rega Buner
91	Mr. Ayub Khan HM BS-17 working as SDEO (M) Dagar Buner	HM BS-17 GHS Anar Baig Mardan
92	Mr. Mir Samad ASDEO BS-16 working as SDEO (M) Batagaram	Services placed at disposal of Directorate of E&SE KPK
93	Mr. Sherferoz SST BS-16 working as SDEO (M) Alai Batagaram	Services placed at the disposal of DEO(M) Batagaram
94	Mr. Shabir Ahmed HM BS-17 working as SDEO (M) Baffa Mansehra,	HM BS-17 GHS Darband (New) Mansehra
95	Mr. Abid Hussain, HM BS-17 working as SDEO (M) Ghazi Haripur	HM BS-17 GHS Chintari Haripur
96	Mr. Aman Ullah HM BS-17 working as SDEO (M) Bannu	HM BS-17 GHS Bilawar Khan Bannu
97	Mr. Akhtar Zaman HM BS-17 working as SDEO (M) Lakki Marwat	HM BS-17 GHS Shukrullah Hussain, Bannu
98	Mr. Muhammad Shafiq HM BS-17 working as SDEO (M) Sarai Naurang, Lakki Marwat	HM BS-17 GHS Nowar Khel Lakki Marwat
99	Mr. Raja Sheraz Ahmed HM BS-17 working as SDEO (M) Torghar	HM BS-17 GHS Judba Torghar
100	Mr. Sanaullah SS (Maths) BS-17 working as assistant Director	SS (Maths) BS-17 GHSS No.1 Peshawar City
101	Mr. Iqbal Hussain SS (Pashtu) BS-17 working as Assistant Director	SS (Pashto) BS-17GHSS No.1 Peshawar City
102	Mr. Abdul Qayyum ADEO BS-16 working as Assistant Director Directorate of E&SE	Services placed at disposal of Director E&SE KPK for further posting

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-9-

**GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

103	Mr. Hameed Ur Rehman ADEO BS-16 working as Assistant Director, Directorate of E&SE	Services placed at disposal of Directorate E&SE KPK for further posting
104	Mr. Aziz Ul Haq SS (Maths) BS-17 working as Assistant Director, Directorate of E&SE KPK	SS (Maths) BS-17 GHSS Manga Mardan
105	Mr. Hamood Ur Rehman ADEO BS-16 working as Assistant Director BS-17, Directorate of E&SE KPK	Services placed at disposal of Directorate E&SE KPK for further posting.
106	Mr. Azim Khan ADEO BS-16 working as Assistant Director BS-17 Directorate of E&SE KPK	Services placed at disposal of Directorate E&SE KPK for further posting.
107	Mr. Muhammad Ilyas, SDEO BS-17 working as AD BS-17 at Directorate of E&SE.	SDEO BS-17 Lachi Kohat
108	Mr. Abdur Rehman, SDEO BS-17 Topi Swabi	Services placed at disposal of Directorate E&SE KPK for further posting.
109	Mr. Shahid Lodan, SDEO (BS-17) Wari Dir Upper	Services placed at disposal of Directorate E&SE KPK for further posting.
110	Mr. Amin Zada, SS (BS-17) GHS Akhwagram Dir Upper	SDEO (BS-17) Wari Dir Upper

2. No TA/DA is allowed.

**SECRETARY**

Endst: of even No. & Date

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar
3. District Education Officers (Male), Concerned.
4. District Account Officers, Concerned.
5. PS to Chief Secretary, Khyber Pakhtunkhwa.
6. PS to Advisor to CM for E&SE Department.
7. PS to Secretary E&SE Department.
8. PA to Additional Secretary (Estab), E&SE Department.
9. PA to Deputy Secretary (Admn), E&SE Department.
10. In-charge EMIS E&SE Department with the request to upload it on the website of the Department i.e. [www.kpese.gov.pk](http://www.kpese.gov.pk)
11. SDEOs Concerned.
12. Master file.

  
(ANWAR AKBAR KHAN) 20/11/18  
SECTION OFFICER (SCHOOLS MALE)