

12/9/2017

Counsel for the appellant and Muhammad Adeel Butt, AAG alongwith Hameed-ur-Rehman, AD for the respondents present. The learned counsel for the appellant argued the case at some length, but when this Tribunal referred to a recent judgment of the august Supreme of Pakistan 2017 SCMR 890 the learned counsel sought some time. Granted. To come up for further arguments before this DB on 11/10/2017.


MEMBER



CHAIRMAN

11.10.2017

Counsel for the appellant and Mr. Kabeerullah Khattak, Addl. Advocate General for the respondents present. Arguments heard and record perused.

This appeal is dismissed as per our detailed judgment of today in connected service appeal No. 984/2015 entitled "Badshah Islam Vs. The Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar and others". Parties are left to bear their own costs. File be consigned to the record room.


Member


Chairman

ANNOUNCED

11.10.2017

01.03.2017

Counsel for appellant and Mr. Hameed-ur-Rehman, AD (litigation) alongwith Mr. Muhammad Adeel Butt, Additional AG for respondents present. Learned counsel for appellant requested for adjournment. Adjournment granted. To come up for arguments on 18.05.2017 before D.B.



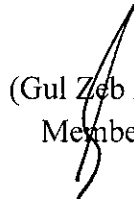
(AHMAD HASSAN)
MEMBER



(ASHFAQUE TAJ)
MEMBER

18.05.2017

Counsel for the appellant and Mr. Muhammad Adeel Butt Additional AG for the respondents present. Counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 12.09.2017 before D.B.



(Gul Zeb Khan)
Member



(Muhammad Amin Khan Kundi)
Member


24.05.2016

Agent of counsel for the appellant, M/S. Khursheed Khan, SO and Hameedur Rahman, AD alongwith Addl. AG for the respondents present. Requested for adjournment. Requested for adjournment. Last opportunity granted. To come up for written reply/comments on 26.07.2016 before S.B.


Chairman

26.7.2016

Counsel for the appellant and M/S Khursheed Khan, SO and Hameedur Rahman, AD alongwith Addl. AG for the respondents resent. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 24.11.2016.


Chairman

24.11.2016

Counsel for the appellant and Assistant AG for respondents present. Rejoinder submitted which is placed on file. To come up for arguments on 01.03.2017.


(ABDUL LATIF)
MEMBER


(MUHAMMAD AAMIR NAZIR)
MEMBER

11.09.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant is serving as DPE in BPS-17. That being M.Sc in Health and Physical Education appellant was entitled to BPS-17 with effect from 13.11.2007 on the basis of notification of the Provincial Government of the even date i.e 13.11.2007 but appellant promoted later on with immediate effect regarding which he preferred departmental appeal which was not responded and hence the instant service appeal on 8.9.2015.

That the appellant is entitled to up-gradation and financial benefits thereof with effect from 13.11.2007.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 26.11.2015 before S.B. Notice of application for condonation of delay be also issued for the date fixed.


Chairman

26.11.2015

Counsel for the appellant present. Security and process fee not deposited. The same be deposited within a week, where-after notices be issued to the respondents for written reply/comments for 24.3.2016 before S.B.

Appellant Deposited
Security & Process Fee >


Chairman

24.03.2016

Counsel for the appellant, M/S Khurshid Khan, SO and Hameed-ur-Rehman, AD (lit.) alongwith Assistant AG for respondents present. Written reply not submitted. Requested for adjournment. Last opportunity granted. To come up for written reply/comments on 24.5.2016 before S.B.



Chairman

FORM-A

FORM OF ORDER SHEET

Court _____

Case No. 1000/2015

	Date of order/ proceedings	Order or other proceedings with signature of Judge/ Magistrate
1	2	3
1.	08.09.2015	<p>The appeal of Mr. Deedar Khan presented to-day by Syed Younis Jan, Advocate, may be entered in the institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2.	11-9-15	<p>This case be put up before the S.Bench for preliminary hearing on <u>11-9-15</u></p> <p style="text-align: right;">CHAIRMAN</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 1008, 2015

Didar KhanAppellant

VERSUS

The Chief Secretary, Government of KPK and others.....RESPONDENTS.

I N D E X

S.No.	Description of documents	Annexures	Pages
1.	Grounds of appeal with affidavit		1 - 4
2.	Addresses of parties		0 - 5
3.	Application for condonation of delay with affidavit		6 - 8
4.	Copy of departmental appeal	'A'	9
5.	Copy of impugned Notification dated 15-6-09	'B'	10-11
6.	Copy of Notification dated 13-11-07	'C'	12-13
7.	Copy of certificate	'D'	14
8.	Copy of appointment/promotion order	'E'	15-16
9.	Vakalat Nama		17

PESHAWAR

-09-2015

Appellant

through

(Syed Younus Jan)
Advocate, High Court, Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 1000 / 2015

K.P.K. Province
Service Tribunal

Diary No. 1054
Date 8-9-15

Deedar Khan , Director Physical Education,
Government Higher Secondary School, Chankani
District PeshawarAppellant

VERSUS

1. The Chief Secretary, Government of K.P.K. Peshawar.
2. The Secretary, Elementary & Secondary Education, K.P.K. Civil Secretariat, Peshawar.
3. The Director, Elementary & Secondary Education, K.P.K. Peshawar.
4. The Secretary Establishment Department, K.P.K. Civil Secretariat, Peshawar.
5. The Secretary Finance Department, K.P.K. Civil Secretariat, Peshawar.

.....RESPONDENTS.

APPEAL UNDER SECTION 4 OF K.P.K. SERVICE TRIBUNAL ACT, 1974.
TO THE EFFECT THAT THE ORDER/NOTIFICATION DATED 15-06-2009
MAY KINDLY BE VARIES/MODIFIED AND AS SUCH THE SAME MAY
KINDLY BE MADE EFFECTIVE FROM 13-11-2007 INSTEAD OF
IMMEDIATE EFFECT. (COPY OF DEPARTMENTAL APPEAL IS ANNEX: 'A')

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8/12/15

Prayer-in-appeal

That on acceptance of this appeal, the order/Notification dated 15-06-2009 may kindly be varied/modified^{to} the extent that the same may kindly be made effective from 13-11-2007 instead of immediate effect and as such the Department may kindly be directed to consider the promotion of the appellant to BS-17 (regular) from 13-11-2007 instead of ~~BS-17~~ immediate effect with all other service benefits.

(Copy of the impugned order/Notification dated 15-06-2009 is attached as Annexure 'B' and dated 13-11-07 is Annex: 'C').

→ 2 →

Respectfully submitted:

Brief facts of the appeal are as under :-

1. That the qualification of the appellant is M.A/M.Sc. in Health and Physical Education who ~~was~~ was declared Passed in 1988 exam. (Copy of certificate is attached as Annex: 'D').
2. That the appellant was regularly appointed/promoted to the post of Director Physical Education (DPE) vide order dated 18-02-2003. (Copy of the same is Annexure 'E').
3. That the Government of K.P.K. on 13-11-2007 issued a letter/Notification vide which the posts of D.P.Es. and Librarians were upgraded from BS-16 to BS-17 (regular) for the existing incumbents who hold the Master Degrees in the relevant subjects i.e. M.A/M.Sc. in Health and Physical Education in case of the appellant. (Copy of the said Notification is Annexure 'C' above).
4. That the appellant is/was highly qualified, fit and thus was fully eligible for award of BPS-17 regular in light of the above referred Notification of the Government of K.P.K. but he was illegally/un-constitutionally, mala fide and intentionally was ignored for the same relief so he agitated the matter with the authority but of no use so he filed a departmental appeal before respondent No.1 which is still pending before him and after lapse of statutory period no order/communication has been made on the same so far, hence this appeal on the following amongst other grounds :-

G R O U N D S


- A) That the act and omissions of the respondents is illegal, un-constitutional against facts and material on record, therefore, is not tenable and need the interference of this Hon'ble Tribunal.

- B) That the act and omissions of the respondents is not only factually incorrect and legally untenable but also is based on their mala fide intention and is also against the well established principles of natural justice and is discriminatory in nature.
- C) That the act and omissions of the respondents is also against the laws/rules/policies and Notifications of the Provincial Government especially against the Notification dated 13-11-07.
- D) That the case of the appellant is very much similar and identical with those numerous cases in which the higher/superior courts and Tribunals as well as this Hon'ble Tribunal is given a similar relief to other colleagues of the appellant and the appellant is also entitled to the same relief/treatment.
- E) That the Department has also given a similar relief to other colleagues of the appellant including his junior so on this score also the appellant is entitled to the same relief.
- F) That the appellant was highly qualified, fit and thus was quite eligible for the award of BPS-17 (regular) at the time of and in light of the letter/Notification dated 13-11-07 so the impugned Notification dated 15-06-2009 vide which the promotion of the appellant to BS-17(regular) has been made with immediate effect is neither legal nor justified.
- G) That the appellant is/was a Government/Civil Servant and legal and constitutional guarantee is/was available to him to be treated equally and in accordance with law. He however, has not been treated as such.

It is, therefore, humbly prayed that on acceptance of this appeal, the impugned order/Notification dated 15-06-2009

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may kindly be varied/modified to the extent that the same may kindly be made effective from 13-11-2007 instead of immediate effect and as such the Department may kindly be directed to consider the promotion of the appellant to BS-17 (regular) from 13-11-07 instead of immediate effect with all other service benefits. Any other remedy/relief available in the circumstances of the case may also kindly be granted to the appellant.

~~Deedar~~
Appellant
through 
(Syed Younus Jan)
Advocate, High Court, Peshawar

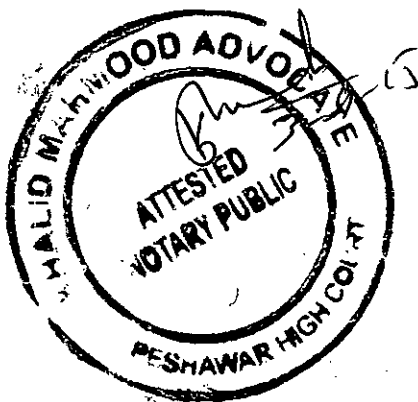
PESHAWAR

-09-2015

AFFIDAVIT

I, Deedar Khan, (the appellant) do hereby solemnly affirm and declare on oath that the contents of this appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

~~Deedar~~
Deponent



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

In re:- Service Appeal No. _____/

Deedar KhanAppellant

Versus

The Chief Secretary, K.P.K. and othersRespondents.

REPLICATION ON BEHALF OF APPELLANT TO THE JOINT
PARA-WISE COMMENTS OF RESPONDENTS NO.1 - 5

Respectfully submitted:

Replication to the preliminary objections

1-12)

The preliminary objections raised by the respondents in these paras are incorrect, false, misconceived and are based on no evidence, hence denied. Moreover, it is submitted that the appellant has got a valid cause of action/locus standi to challenge the illegal acts and omissions of the respondents. The appeal is well within time, no facts have been concealed from this Hon'ble Tribunal and no dirty hands have been shown or proved each and every facts has been narrated by the appellant in his appeal and all the necessary parties have been arrayed by him in his appeal, no misjoinder or non-joinder has been shown or proved by the respondents. No malafide on the part of the appellant has been shown or proved while the same is proved on the part of the respondents. The appeal is maintainable in its present form and in the present circumstances and there could be no other form but in which it has been submitted and the same is not barred by any law but has been submitted strictly in accordance with laws/Rules. Moreover, being a matter of terms and conditions of service this Hon'ble Tribunal has got a valid jurisdiction. _____ 2

Replication to the facts.

- 1) Needs no replication.
- 3&4) In these paras the contents of the appeal have been admitted as correct, therefore, need no replication.
- 2&5) The contents of these paras of the reply are incorrect, false and misconceived, hence denied while the contents of these paras of the appeal are correct, true and clear crystal. Moreover, it is submitted that as the matter of non-filing of a departmental appeal is concerned in this regard, it is submitted that firstly this Hon'ble Tribunal may kindly see that whether in light of the law laid down by the august Supreme Court in cases of Hameed Akhtar Niazi Versus The Secretary Establishment Division, Govt. of Pakistan and others reported in 1996 SCMR page 1185 and Tara Chand and others Versus Karachi Water & Sewerage Board Karachi & others in light of the law laid down in these judgments the respondents were legally bound/required to grant the relief to the appellant being a similarly placed person but by not doing so the respondents have not only committed the contempt of court but have also disregard the judgments passed by this Hon'ble Tribunal and therefore have rendered themselves to bear its consequences, secondly as compelled by the Department, the appellant has properly filed a departmental appeal and then this appeal., and even the fact of filing departmental appeal has been stated by the appellant on affidavit and the strong legal presumption would be that the copy of the departmental appeal attached to the instant appeal is sent to the respondents (competent authority) very before and after lapse of a considerable period what action has been taken on the same.

Replication to the grounds

- A-G) The contents of these paras of the reply are incorrect, false, misconceived and without proof, hence denied, moreover, it is submitted that as the appellant was highly qualified, fit and thregular was fully eligible for award of BPS-17 as personal grade at the

time and in light of para-1 of the letter/Notification dated 13-11-2007, so the impugned act and omissions of the department/respondents is not only factually incorrect and legally untenable but also is based on the malafide intention of the respondents and is against the principles of natural justice and is neither in accordance with law nor is based on facts or law. The stand of the appellant is neither baseless nor is against the factual position but the act and omission of the respondents is not in legal sphere and even the appellant has not been treated in accordance with laws/Rules and the appellant has got cogent proof/evidence in his favour which he will produce before the Hon'ble Tribunal at the time of arguments.

It is, therefore, prayed that on acceptance of the above and facts narrated and grounds mentioned in the appeal, the appeal of the appellant may kindly be accepted and the relief claimed in the appeal may kindly be granted to the appellant.


Appellant

through

PESHAWAR

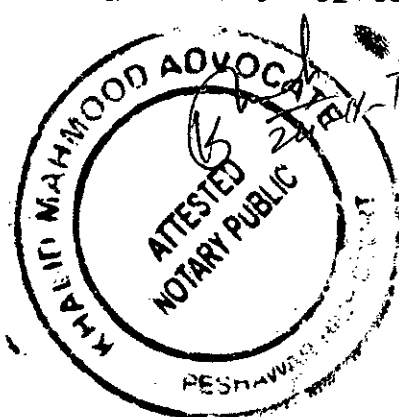
23-11-2016

(Syed Younas Jan)
Advocate, Peshawar

AFFIDAVIT/COUNTER AFFIDAVIT

I, Deedar Khan, D.P.E. (the appellant) do hereby solemnly affirm and declare on oath that the contents of this replication are true and correct and clear crystal and nothing has been concealed from this Hon'ble Tribunal while the contents of the reply of the respondents are false, incorrect and misconceived.


Deponent



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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. _____ / 2015

Deedar KhanAppellant

Versus

The Chief Secretary, Govt. of K.P.K.
and othersRespondents.

ADDRESSES OF THE PARTIES

Appellant

Deedar Khan, Director Physical Education (D.P.E)
Government Higher Secondary School, Chamkani,
District Peshawar.

Respondents

1. The Chief Secretary, Govt. of K.P.K.
Civil Secretariat, Peshawar.
2. Secretary Elementary and Secondary Education
Civil Secretariate Peshawar.
3. The Director Elementary and Secondary Education Khyber
Pakhtoonkhwa near Govt: Higher Secondary School Peshawar
City GT Road Peshawar.
4. The Secretary Establishment Department Khyber Pakhtoonkhwa
Civil Secretariate Peshawar.
5. The Secretary Finance Department Khyber Pakhtoonkhwa
Civil Secretariate Peshawar.

Dated: _____ /20 15

Appellant _____

Through:



(SYED YOUNUS JAN)
Advocate Peshawar High Court
Peshawar.

6

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR

Appeal No. _____/ 2015

Deedar Khan Applicant/Appellant

Versus

The Chief Secretary, Govt. of K.P.K.
and others Respondents.

APPLICATION FOR CONDONATION OF DELAY (IF ANY).

Respectfully submitted:

The applicant/appellant submits as under:-

That firstly the act and omission of the respondents /department is illegal, unconstitutional and void and secondly as financial matter is involved in the matter and the cause of action is the running cause of action, therefore, no limitation runs against the appellant/applicant, but even if this Honourable Tribunal considers the departmental appeal time barred then this application for condonation of delay if any on the following amongst other grounds:-


GROUNDS:

1. That in the matter in hand the cause of action is continuous cause of action and the impugned act and omission of the respondents come in the purview of the definition of continuous wrong, therefore, in the matter the cause of action starts on first date and ends on the last date of every months/every year, therefore, no question of delay arises in the matter.
2. That the law requires that the matters should/must be decided on merits rather than on technical grounds including the limitation.

3. That the appellant/applicant has got a very good case in his favour therefore, technicalities including the point of limitation(The delay if any) are ignorable.
4. That the appeal of the appellant before this Honourable Tribunal is well within time and strictly in accordance with law contained in Section 4 of the NWFP now Khyber Pakhtunkhwa Service Tribunal Act 1974.
5. That if the delay if any is not condoned the applicant/appellant will suffer an irreparable loss to his seniority, promotion and all other service benefits.
6. That the delay if any has been caused by the delaying tactics of respondents/department and the appellant cannot be held responsible for the same.
7. That in so many similar and identical cases this Honourable Tribunal has ignored the point of limitation and in so many cases has condoned the delay, therefore, in this case also the same point is ignorable/condonable.

It is, therefore, respectfully prayed that on acceptance of this application in the best interest of justice the delay if any in filing departmental appeal may kindly be condoned/ignored and the appeal of the appellant/applicant may kindly be decided on merits. Any other remedy/relief available in the circumstances of the case may also kindly be granted to the applicant/appellant.

Dated 19/2015

Applicant/Appellant
Through 
(Syed Younus Jan)
Advocate Peshawar High Court
Peshawar.

8

BEFORE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR.

Appeal No. _____ / 2015

Deedar Khan Applicant/Appellant

Versus

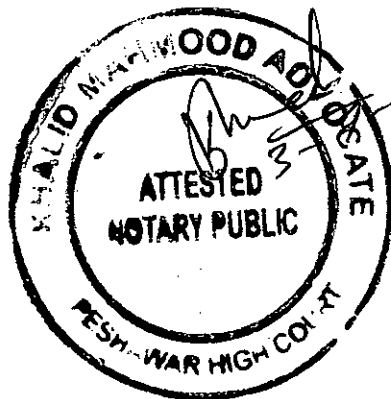
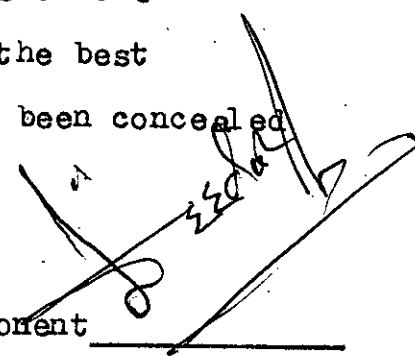
The Chief Secretary, Govt. of K.P.K.
and others Respondents.

AFFIDAVIT.

I, Deedar Khan applicant (appellant) to hereby solemnly affirm and declare on Oath that the contents of the attach application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal

Dated 19/2015.

Deponent



To
The Worthy Chief Secretary,
K.P.K. Peshawar.

Subject:- DEPARTMENTAL APPEAL/REPRESENTATION.

Through PROPER CHANNEL

Sir,

1. That the applicant/appellant is M.A/M.Sc. in Health and Physical Education whose result was declared on and was regularly appointed/promoted against the post of DPE (BPS-16) vide order dated
2. That in 2007 the Government of K.P.K. issued the letter/ Notification vide which the posts of D.P.Es. were upgraded from BS-16 to BS-17 regular for the existing incumbents who hold Master Degree in relevant subject i.e. M.A/M.Sc. in Health & Physical Education in case of the applicant.
3. That in light of the above referred letter of the Provincial Government the appellant/applicant is/was highly qualified, fit and eligible for the award of regular BPS-17 but has illegally, un-constitutionally and mala fide been ignored for the same.
4. That now the appellant/applicant has been promoted to regular BPS-17 but with immediate effect instead of 13-11-07 vide order dated 27-05-2009.
5. That the applicant/appellant agitated the matter with the authority but of no use, hence this appeal/representation.

Your goodself is therefore, requested sir, that the letter/Notification dated 19-05-09 may kindly be made effective from 13-11-2007 instead of immediate effect and as such the regular promotion of the appellant to BS-17 regular may kindly be considered from 13-11-07 instead of immediate effect with all other service benefits.

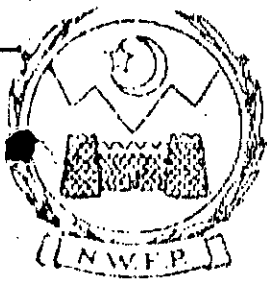
PESHAWAR

22-05-2015

(Signature)
 M.A.B.L.A. B.Ed. cum. ...
 Advocate High Court Peshawar
 Federal ... Court.

Appellant

24/5/15
 Esda
 M.Sc. D.P.E
 G. H. S. S. Chundani



(1)
GOVERNMENT OF NWFP
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the 15-6-2009.

Annex "B"
10

NOTIFICATION

NO.SO(PE)2-6/E&SE/DPCMEETING/LIB/09: Consequent upon recommendations of the Departmental Promotion Committee, the competent authority is pleased to promote the following Twenty Three (23 Male) & Thirteen (13 Female) DPEs from BS-16 to BS-17 according to their seniority on regular basis with immediate effect:-

MALE DPEs

S.No	Name & Designation of Officers	Place of Posting	Remarks
1.	Mr. Abdul Hameed ADO's (sports) O/O EDO E&SE Lakki	GHSS Langarial Abbottabad.	Against Vacant Post
2.	Mr. Amanullah Khan DPE GHSS Tajazai Lakki	GHSS Tajazai Lakki	Already occupied by him.
3.	Q.S. Mohibullah Shah DPE GHSS Karak	GHSS Karak	-do-
4.	Muhammad Aslam DPE GHSS Abdul Khel Lakki	GHSS Abdul Khel Lakki	-do-
5.	Mr. Sardar Ali DPE GHSS Ghani Dehri Malakand Dargai	GHSS Ghani Dehri Malakand Dargai	-do-
6.	Muhammad Hashim DPE GHSS No. 3 Peshawar City	GHSS No.3 Peshawar City	-do-
7.	Muhammad Saeed ADO (Sports) EDO E&SE Swabi	GHSS Rhich Bhan Abbottabad	Against Vacant Post
8.	Muhammad Ibrahim ud Din DPE GCPE (M)Karak	GHSS Boi Abbottabad	-do-
9.	Mr. Deedar Khan DPE GHSS Chamkani Peshawar	GHSS Chamkani Peshawar	Already occupied by him.
10.	Mr. Abdul Sattar DPE GHSS, Gul Imam Tank	GHSS Gul Imam Tank	-do-
11.	Muhammad Saeed Shah DPE GHSS Kawi Manshra	GHSS Kawi Manshra	-do-
12.	Mr. Khaki Rehman DPE GEC (M) Mir Ali NWA	GEC (M) Mir Ali NWA	-do-
13.	Mr. Habib Ullah DPE GHSS Dargai Charsadda	GHSS Dargai Charsadda	-do-
14.	Mr. Habibullah DPE GHSS Mamash Khel Bannu	GHSS Mamash Khel Bannu	-do-
15.	Mr. Zahoor Ahmad DPE GHSS Manki Sharif Nowshera	GHSS Manki Sharif Nowshera	-do-
16.	Mr. Lal Bacha DPE GHSS Mansabdar Swabi	GHSS Mansabdar Swabi	-do-
17.	Abdur Rauf DPE GHSS Wadpaga Peshawar	GHSS Wadpaga Peshawar	-do-
18.	Mr. Fakhr Zaman Shah DPE, GHSS Dhand Saghri, Kohat	GHSS Dhand Saghri, Kohat	-do-
19.	Mr. Wali-ur-Rehman DPE, GCPE Karak	GCPE Karak	-do-
20.	Mr. Kamran Ali, DPE GHSS, Nagri Bunair	GHSS Nagri Bunair	Already occupied by him
21.	Mr. Muhammad Iqbal, DPE GHSS Tehkal Bala Pesh:	GHSS Tehkal Bala Pesh:	-do-
22.	Muhammad Arif DPE, GHSS Bam Khel Swabi	GHSS Bam Khel Swabi	-do-
23.	Mr. Zard Ali Khan DPE GHSS Urmar payan Peshawar	GHSS Urmar payan Peshawar	-do-

M. Farid Muhammad/Kaleem Khan Malsood/Final Notification/09

(P.T.O.)

Attested
BYED YOUSUF JANI
B.A.B. 5 Ed. Certificate No. 225
Advocate High Court Peshawar
Federal Shariat Court.

FEMALE DPEs

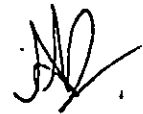
S.No	Name & Designation of Officers	Place of Posting	Remarks
1	Mst. Samina Habib DPE RITE(F) Kohat.	RITE(F) Kohat.	Already occupied by her
2	Mst. Gul Nar DPE GGHSS Comp: Abbottabad.	GGHSS Comp: Abbottabad.	-do-
3	Mst. Abida Parveen DPE GGHSS Malakpura Abbottabad	GGHSS Malakpura Abbottabad	-do-
4	Mst. Robina Shaheen DPE GGHSS S.K.Bala Bannu.	GGHSS S.K.Bala Bannu.	-do-
5	Mst. Sughra Afandi DPE GGHSS Gujrat Mardan.	GGHSS Gujrat Mardan.	-do-
6	Mst. Sujhaat Begum DPE GGHSS Takhtbhai Mardan	GGHSS Takhtbhai Mardan	-do-
7	Mst. Saima Gul DPE GGHSS Topi Swabi	GGHSS Topi Swabi	-do-
8	Mst. Sadia Hazrat DPE GGHSS Kopar Malakand	GGHSS Kopar Malakand	-do-
9	Mst. Saira Illaf DPE GGHSS Abbottabad	GGHSS Abbottabad	-do-
10	Mst. Dil Afroz DPE GGHSS Utmanzai Charsadda	GGHSS Utmanzai Charsadda	-do-
11	Mst. Robina Shaheen DPE GGHSS Katlang Mardan.	GGHSS Katlang Mardan.	-do-
12	Mst. Riffat Shaheen DPE GGHSS Garhi Habibullah Mansehra	GGHSS Garhi Habibullah Mansehra	-do-
13	Mst. Arifa Saleem DPE GGHSS Khairabad Nowshera	GGHSS Khairabad Nowshera	-do-

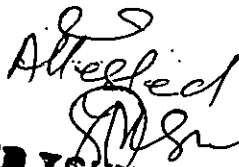
**SECRETARY TO GOVT OF NWFP
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

Endst: of even no. & date:

Copy is forwarded to:-

- 1) Secretary to Govt of NWFP, Establishment Department, Peshawar.
- 2) Special Secretary (Regulation), Establishment Department, Govt of NWFP Peshawar.
- 3) Secretary to Govt. of NWFP, Finance Department, Peshawar.
- 4) Director (E&SE) NWFP Peshawar.
- 5) Executive District Officer (E & SE) concerned.
- 6) The Accountant General NWFP.
- 7) District Accounts Officer concerned.
- 8) Deputy Database Administrator (EMIS) Elementary & Secondary Education Peshawar.
- 9) PA to Secretary Elementary & Secondary Edu: Department
- 10) Officer concerned
- 11) Master file


(ARIF JAMIL)
SECTION OFFICER
(PRIMARY)

Attested

SYED YOUNUS JAN
B.A.B.S. 5 Ed, Certificate Exam Day
Advocate High Court, Peshawar
Federal Shariat Court.

GOVERNMENT OF N.W.F.P.
SCHOOLS & LITERACY DEPARTMENT
Dated, Peshawar the 13/11/2007.

NOTIFICATION.

No.SOG/S&L/1-69/06/Vol-1/DPE/LIB: Sanction of the competent authority is hereby accorded to the upgradation of the posts of Librarians and Directors Physical Education (D.P.Es) from BS-16 to BS-17 (Regular) for the existing incumbents who hold Master Degree in the relevant subject in the Schools & Literacy Department NWFP with immediate effect as per following details:-

- 1) Promotion against the upgraded posts (from BS-16 to BS-17) shall be made in the prescribed manner and in accordance with the service rules to be framed as per relevant provisions of the NWFP Civil Servants (Appointment, Promotion and Transfer) Rules 1989 read with the NWFP Civil Servants Act, 1973.
- 2) The Librarians and D.P.Es who hold the diploma in the relevant subject will stay in BS-16 till such time, they acquire Master degree in the respective subject. On acquiring Master Degree in the relevant subject, their posts will be upgraded on case to case basis from BS-16 to BS-17 (Regular) and promotion (from BS-16 to BS-17) would be given as per laid down procedure and in accordance with the service rules to be framed. However their existing seniority will remain intact.
- 3) All the vacant posts of Librarians and D.P.Es in Schools & literacy department in BS-16 are hereby upgraded to BS-17, appointments against which would be made from amongst the persons who hold Master degree in the relevant subject, in the prescribed manner.
- 4) In future Librarians and D.P.Es will initially be recruited on the basis of Master degree in the relevant subject in BS-17 (Regular).
- 5) Henceforth no appointment of Librarians and D.P.Es in BS-16 shall be made on the basis of diploma, being declared as "Dying Cadre".

Sd/-

SECRETARY TO GOVERNMENT OF NWFP
SCHOOLS & LITERACY DEPARTMENT.

Endst:No. FD (SOSR-II) 10-7 / 03 / VOL.- III Dated, Peshawar the, 13/11/2007

Copy is forwarded for information and necessary action to :-

- 1) The Accountant General, NWFP, Peshawar.
- 2) All District Accounts Officers in NWFP.
- 3) All Agency Accounts Officers in NWFP.

(MUNAWAR KHAN)
SECTION OFFICER (SR-11)
FINANCE DEPARTMENT
GOVERNMENT OF NWFP.

Attested
BYED YOUSUF JAM
B Ed. Certificate holder
Advocate High Court Peshawar
Federal Shariat Court.

(P.T.O.)

13

Endst:No. & Date Even.

Copy is forwarded to:-

- 1) Secretary to Government of NWFP, Establishment Department.
- 2) Secretary to Government of NWFP, Finance Department.
- 3) P.S to Chief Minister NWFP, Peshawar.
- 4) P.S to Chief Secretary NWFP, Peshawar.
- 5) Director Schools & Literacy, NWFP, Peshawar.
- 6) Director, Curr; & Teachers Edu; NWFP, Mandian Abbottabad.
- 7) Director of Education FATA NWFP, Peshawar.
- 8) P.S to Minister of Education, NWFP, Peshawar.
- 9) P.S to Secretary Schools & Literacy NWFP, Peshawar.
- 10) Office File.



(FARID AHMAD KHATTAK)
SECTION OFFICER (GENERAL)
SCHOOLS & LITERACY DEPARTMENT
GOVERNMENT OF NWFP.



SYED YOUSAF JAN
B.A.B.S. B Ed, Certificate Shari'ah by
Advocate High Court Peshawar
Federal Shariat Court.

Serial No. GU-00305

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Annex D¹⁹

GOMAL UNIVERSITY

DERA ISMAIL KHAN

1988

(U.F.P) PAKISTAN



VERIFIED

Controller of Examinations
Gomal University,
Dera Ismail Khan

Muhammad
12/5/09

(Session 1986-87)

DEEDAR KHAN, Son of Dost MOHAMMAD and

a student of the DEPARTMENT OF PHYSICAL EDUCATION,

having passed the prescribed examination in SEPT/OCTOBER, 1988,

is this day admitted by the Gomal University to the DEGREE of

MASTER OF SCIENCE

in the SECOND Class

The subject of examination being H.P.E.

The Examination was taken as ~~as a whole~~ / in parts.

Registered No. 100-PEOU-83

Roll No. 3512

MAY 4, 19 88

Countersigned

Controller of Examinations

Vice-Chancellor

Attested
[Signature]

SYED YOUSUF JAN
B.A.B.S. & Co. Attorneys & Chartered Accountants
Advocate High Court Peshawar
Federal Shariat Court.

DIRECTORATE OF SCHOOLS AND LITERACY N.W.F.P. PESHAWAR.

OFFICE ORDER.

Annex E (15)

Consequent upon the approval by the Departmental Selection Committee Schools & Literacy NWFP in its meeting held on 26-12-2002. The following CT/PET/PTC, etc are hereby promoted to the posts of DPE/ADO (Physical) B-16 on regular basis in the interest of public service with immediate effect.

S.#	Name & Designation	Promoted as	Place of posting	Remarks
1	Mr. Sher Azam Khan PET	DPE	GEC, Ghorri Wala Bannu	Against the post already occupied by him
2	Mr. Siraj-ud-Din PET	DPE	GHSS, Khowaza Khela Swat	Against the post already occupied by him
3	Muht Ibrahim-ud- Din PET	DPE	GHSS, Lachi Kohat	Against the post already occupied by him
4	Mr. Bahadar Nawaz PET	DPE	GHSS No. 2 Pesh: Canmtt:	Against the post already occupied by him
5	M. Falak Naz PET	DPE	GHSS Manga Dargai Charsadda	Against the post already occupied by him
6	Mr. Deedar Khan PET	DPE	GHSS Chaunkani Peshawar	Against the post already occupied by him
7	Mr. Muhammad Jalal PET	DPE	GHSS Kakki Bannu	Against the post already occupied by him
8	Mr. Abdus Sattar PET	DPE	GHSS Gul Imam Tank	Against the post already occupied by him
9	Mr. Jamal Abdul Nasir PET	DPE	GHSS Totakan Mkd Agy:	Against the post already occupied by him
10	Muht Faisal Phy: Supervisor	DPE	GHSS Daag Peshawar	Against the post already occupied by him
11	Mr. Muhammad Naem PET	DPE	GHSS Ghauri Kapura MDN	Against the post already occupied by him
12	Mr. Saikat Hayat PET	DPE	GHSS Kot Malakand Agy:	Against the post already occupied by him
13	Mr. Bashir Ahmad PET	DPE	GHSS Dosehra Char: Janda	Against the post already occupied by him
14	Mr. Shamal Khan PET	DPE	GHSS Dara Pezu Lak:	Against the post already occupied by him
15	Mr. Aqal Daraz PET	DPE	GHSS Tough Bala Kohat	Against the post already occupied by him
16	Mr. Azizullah Khan PET	DPE	GHSS Kotgarh D I Khan	Against the post already occupied by him
17	Abdul Majeed Phy: Supervisor	DPE	GEC (M) Peshawar	Against the post already occupied by him
18	Mr. Muhibullah PET	DPE	GHSS Nizampur NSR	Against the post already occupied by him
19	Mr. M. Saeed Shah PET	DPE	GHSS Kawai Manshera	Against the post already occupied by him
20	Mr. S. Bakht Shah PET	DPE	GHSS Zaida Sawabi	Against the post already occupied by him
21	Mr. Hameedullah Khan PET	DPE	GHSS Dakki D. I. Khan	Against the post already occupied by him
22	Mr. Muhammad Israr PET	DPE	GHSS Bughdad Mardan	Against the post already occupied by him
23	Mr. Naem Khan PET	DPE	Phy: Edu: Collage Karak	Against the post already occupied by him
24	Mr. Shah Mehmood PET	DPE	GHSS Umar Payan Pesh:	Against the post already occupied by him
25	Mr. Tali Zar Khan PET	DPE	GHSS Katlang Mardan	Against the post already occupied by him
26	Mr. Rais Khan PET	DPE	GHSS Kheshgai NSR	Against the post already occupied by him
27	Mr. Inayat Khan PET	LPE	GHSS Umar Zai Chd:	Against the post already occupied by him
28	Mr. Sardar Khan PET	LPE	GHSS Mayar Mardan	Against the post already occupied by him
29	Mr. Ihtishamud Din PET	DPE	GHSS Bilitang Kohat	Against the post already occupied by him
30	Mr. Abdullah Shah PET	DPE	ADO (Phy:) at EDO (S&L) Tank	Against the post already occupied by him
31	Mr. Rukh Niaz PET	LPE	GHSS Khanis Por Abbottabad	Against the post already occupied by him
32	Mr. Abdul Ghaffar PET	DPE	GHSS Lal Qilla Dir	Against the post already occupied by him
33	Mr. Gul Badshah PET	DPE	GHSS Hazar Khwani Pesh:	Against the post already occupied by him
34	Mr. Muhammad Safdar PET	DPE	GHSS Doaba Kohat	Against the post already occupied by him
35	Mr. Safdar Jan PET	DPE	GHSS No. 1 Peshawar city	Against the post already occupied by him
37	M. Fazli Rabbi PET	DPE	GHSS Totalai Buner	Against the post already occupied by him
38	Mr. Khaki Rehman PET	DPE	GEC (M) Mir Ali NWA	Against the post already occupied by him
39	Mr. Roshan Akber PET	DPE	GHSS Gandaf Swabi	Against the post already occupied by him
40	Mr. Habibullah PET	DPE	ADO (Phy) at EDO (S&L) Charsadda	Against the post already occupied by him
41	Mr. Lal Marjan PET	DPE	GHSS Shabqadar For. Jhd:	Against the post already occupied by him
42	Mr. Ahmad Nawaz PET	DPE	ADO (Phy:) at EDO (S&L) Battagram	Against the post already occupied by him
43	Mr. Zar Bahisht Khan PET	DPE	ADO (Phy:) at EDO (S&L) Buner	Against the post already occupied by him
44	Mr. Kiramatullah PET	DPE	GHSS Bogara Karak	Against the post already occupied by him
45	Mr. Salar Khan PET	DPE	GHSS Baghicha Dheri Mardan	Against the post already occupied by him
46	Mr. Rashi Din PET	DPE	GHSS Warana Karak	Against the post already occupied by him
47	S. Fazal Abbas Zaidi PET	DPE	GHSS Utmanzai Charsadda	Against the post already occupied by him
48	Mr. Falak Naz PET	DPE	GHSS Adezai Peshawar	Against the post already occupied by him
49	Mr. Fazli Wahid PET	DPE	GHSS Khanpur Dir	Against the post already occupied by him
50	Mr. Mushtaq Khan PET	DPE	GHSS Wazir Bagh Peshawar	Against the post already occupied by him
50	Mr. Arbab Fawad Khalil PET	DPE	ADO (Phy) at EDO (S&L) NSR	Against the post already occupied by him

16

51	Mr. Habibullah PET	DPE	GEC (M) Dir	Against the post already occupied by him
52	Mr. Mujeebur Rehman PET	DPE	GHSS Shakar Dara Kohat	Against the post already occupied by him
53	Mr. Jehan Alam PET	DPE	ADO (Phy:) at EDO(S&L) Shangla	Against the post already occupied by him
54	Mr. Abdul Qadeer Khan PET	DPE	GHSS, Parova D.I.Khan	Against the post already occupied by him
55	Mr. Chamni Khan PET	DFE	GHSS, Takkar GHSS Mardan	Against the post already occupied by him
56	Mr. Anjad Khan PET	DPE	GHSS Sherpao Charsadda	Against the post already occupied by him
57	Mr. Nikhat ullah PET	DFE	GEC (M) Kotka Habibullah FR Banna	Against the post already occupied by him
58	Mr. Farid Zaman C.T.	DFE	Phy.Edu:Collage Karak	Against the post already occupied by him
59	Mr. Ikramullah PET	DPE	GHSS Sirkot Haripur	Against the post already occupied by him
60	Mr. Muhammad Usman PET	DPE	GHSS Muryali D.I.Khan	Against the post already occupied by him
61	Mr. Waris Khan P.T.C.	DPE	GHSS Munda Dir Lower	Against the post already occupied by him
62	Mr. Muhammad Nawaz PET	DPE	GHSS Shabaz Gijari Mardan	Against the post already occupied by him
63	Mr. Ihsan Ullah PET	DPE	GHSS Fatehpur Swat	Against the post already occupied by him
64	Mr. Ashraf Ali Khan PET	DPE	GHSS Ustarzai Kohat	Against the post already occupied by him
65	Mr. Zahoor Zaman P.T.C.	DPE	GHSS Kalam Swat	Against the post already occupied by him
66	Mr. Fateh Sher PET	DPE	GHSS Kabal Swat	Against the post already occupied by him
67	Mr. Muhammad Sharif PET	DPE	GHSS Kot Najibullah H/Fur	Against the post already occupied by him
68	Mr. Said Khan PET	DPE	GHSS Lora Abbottabad	Against the post already occupied by him
69	Mr. Ghulam Hussain PET	DPE	GEC(M) Mardan	Against the post already occupied by him
70	Mr. Ghulam Nabi PET	DPE	GHSS Takli Bhai Mardan	Against the post already occupied by him
71	Mr. Muhammad Gul PET	DPE	GHSS No.2 D.I.Khan	Against the post already occupied by him
72	Mr. Raeesullah P.T.C.	DPE	GHSS Charbagh Swat	Against the post already occupied by him
73	Mr. Nasir Khan PET	DPE	ADO (Phy:) at EDO (S&L) Hangu	Against the post already occupied by him
74	Mr. Zahoor Ahmad PET	DPE	GHSS Jalozai Nowshera	Against the post already occupied by him
75	Mr. Muhammad Haroon PET	DPE	GHSS Ismaila Swabi	Against the post already occupied by him
76	Mr. Muhammad Iqbal PET	DPE	GHSS Turbela T.Ship H/Pur	Against the post already occupied by him
77	Mr. Farmanullah PET	DPE	GHSS Pir Pai Nowshera	Against the post already occupied by him

- Note: -
1. Charge report should be submitted to all concerned.
 2. No TA/DA etc. are allowed.

(IAFIZ BAHADAR KHAN)
 Director Schools & Literacy
 NWFP Peshawar

Endst No. 3542-3628 /A-14/Promo:/DPE B-16.

Dated Peshawar the 18/2 /2003

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

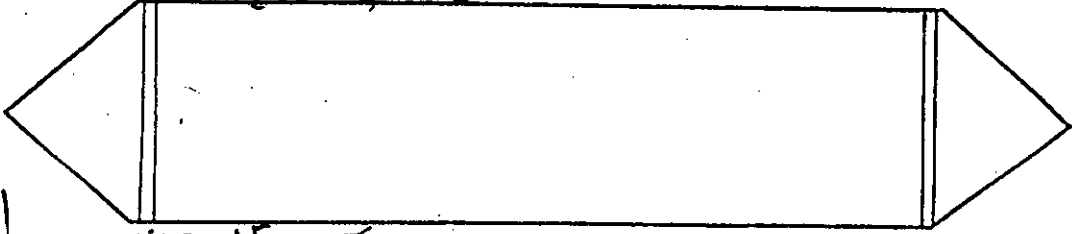
1. Director of Education (FATA) NWFP Peshawar.
2. Director Bureau and Teacher Education NWFP Abbottabad.
3. Accountant General NWFP Peshawar.
4. Executive District Officers (Schools & Literacy) in NWFP.
5. District/Agency Accounts Officers in NWFP.
6. Principal GRC (M) concerned.
7. Principal Govt: College of Physical Education Karak.
8. Principal GHSS concerned.
9. PS to Minister for Education NWFP Peshawar.
10. PS to Secretary Schools & Literacy Department Govt: of NWFP Peshawar.
11. DPE/ADO-Physical concerned.
12. PA to Director Schools & Literacy NWFP Peshawar.

Attested

Deputy Director Establishment
 Directorate Schools & Literacy
 NWFP Peshawar

AYES YOUSUF KHAN
 LL.B., B.Ed., Certificate No. 20
 Advocate High Court Peshawar
 Federal Shariat Court

بعدالت KPK سروس ٹریبونل اور



ن
2015ء پنجاب دیندار رضا ایبلٹ
بنام چیف سیکریٹری KPK وزیر
ریسائڈنٹ
ماہ ستمبر 04
دیندار خان
ایبلٹ

موزخہ 2015/04/04 -
مقدمہ سروس ٹریبونل اور
دعویٰ جرم
سال 2015

باعث تحریر آئٹک

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ
آن مقام سید لولہ جان ایبلٹ اور کیلئے
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
دیکل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک دروپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخ
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ
پرداختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المزوم 04 ماہ ستمبر 2015

واہ الع

بمقام KPK سروس ٹریبونل اور کے لئے منظور ہے۔

Attested & Accepted

SYED YOUSUF JANG
B.A.B.L. & Co. Certificate No. 100
Advocate High Court Peshawar
PESHAWAR COURT.

دیندار خان ایبلٹ

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 1000, 2015

Didar Khan Appellant

VERSUS

The Chief Secretary, Government of KPK and others.....RESPONDENTS.

I N D E X

S.No.	Description of documents	Annexures	Pages
1.	Grounds of appeal with affidavit		1 - 4
2.	Addresses of parties		0 - 5
3.	Application for condonation of delay with affidavit		6 - 8
4.	Copy of departmental appeal	'A'	9
5.	Copy of impugned Notification dated 15- ⁶ / ₀₉	'B'	10-11
6.	Copy of Notification dated 13-11-07	'C'	12-13
7.	Copy of certificate	'D'	14
8.	Copy of appointment/promotion order	'E'	15-16
9.	Vakalat Nama		17

Appellant

through



(Syed Younus Jan)
Advocate, High Court, Peshawar

PESHAWAR

-09-2015

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 1000 / 2015

Deedar Khan , Director Physical Education,
Government Higher Secondary School, Chankani
District PeshawarAppellant

VERSUS

1. The Chief Secretary, Government of K.P.K. Peshawar.
2. The Secretary, Elementary & Secondary Education, K.P.K. Civil Secretariat, Peshawar.
3. The Director, Elementary & Secondary Education, K.P.K. Peshawar.
4. The Secretary Establishment Department, K.P.K. Civil Secretariat, Peshawar.
5. The Secretary Finance Department, K.P.K. Civil Secretariat, Peshawar.

.....RESPONDENTS.

APPEAL UNDER SECTION 4 OF K.P.K. SERVICE TRIBUNAL ACT, 1974.
TO THE EFFECT THAT THE ORDER/NOTIFICATION DATED 15-06-2009
MAY KINDLY BE VARIES/MODIFIED AND AS SUCH THE SAME MAY
KINDLY BE MADE EFFECTIVE FROM 13-11-2007 INSTEAD OF
IMMEDIATE EFFECT. (COPY OF DEPARTMENTAL APPEAL IS ANNEX: 'A')

Prayer-in-appeal

That on acceptance of this appeal, the order/Notification
dated 15-06-2009 may kindly be varied/^{to}modified/the extent
that the same may kindly be made effective from 13-11-2007
instead of immediate effect and as such the Department may
kindly be directed to consider the promotion of the
appellant to BS-17 (regular) from 13-11-2007 instead of ~~BS-17~~
immediate effect with all other service benefits.

(Copy of the impugned order/Notification dated 15-06-2009
is attached as Annexure 'B' and dated 13-11-07 is Annex: 'C').

Respectfully submitted:

Brief facts of the appeal are as under :-

1. That the qualification of the appellant is M.A/M.Sc. in Health and Physical Education whose ~~EXAMINATION~~ was declared passed in 1988 exam. (Copy of certificate is attached as Annex: 'D').
2. That the appellant was regularly appointed/promoted to the post of Director Physical Education (DPE) vide order dated 18-02-2003. (Copy of the same is Annexure 'E').
3. That the Government of K.P.K. on 13-11-2007 issued a letter/Notification vide which the posts of D.P.Es. and Librarians were upgraded from BS-16 to BS-17 (regular) for the existing incumbents who hold the Master Degrees in the relevant subjects i.e. M.A/M.Sc. in Health and Physical Education in case of the appellant. (Copy of the said Notification is Annexure 'C' above).
4. That the appellant is/was highly qualified, fit and thus was fully eligible for award of BPS-17 regular in light of the above referred Notification of the Government of K.P.K. but he was illegally/un-constitutionally, mala fide and intentionally was ignored for the same relief so he agitated the matter with the authority but of no use so he filed a departmental appeal before respondent No.1 which is still pending before him and after lapse of statutory period no order/communication has been made on the same so far, hence this appeal on the following amongst other grounds :-

G R O U N D S

- A) That the act and omissions of the respondents is illegal, un-constitutional against facts and material on record, therefore, is not tenable and need the interference of this Hon'ble Tribunal.

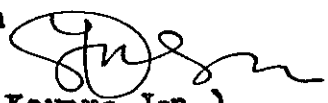
— 3 —

- B) That the act and omissions of the respondents is not only factually incorrect and legally untenable but also is based on their malafide intention and is also against the well established principles of natural justice and is discriminatory in nature.
- C) That the act and omissions of the respondents is also against the laws/rules/policies and Notifications of the Provincial Government especially against the Notification dated 15-11-07.
- D) That the case of the appellant is very much similar and identical with those numerous cases in which the higher/superior courts and Tribunals as well as this Hon'ble Tribunal is given a similar relief to other colleagues of the appellant and the appellant is also entitled to the same relief/treatment.
- E) That the Department has also given a similar relief to other colleagues of the appellant including his junior so on this score also the appellant is entitled to the same relief.
- F) That the appellant was highly qualified, fit and thus was quite eligible for the award of EPS-17 (regular) at the time of and in light of the letter/Notification dated 13-11-07 so the impugned Notification dated 15-06-2009 vide which the promotion of the appellant to BS-17(regular) has been made with immediate effect is neither legal nor justified.
- G) That the appellant is/was a Government/Civil Servant and legal and constitutional guarantee is/was available to him to be treated equally and in accordance with law. He however, has not been treated as such.

It is, therefore, humbly prayed that on acceptance of this appeal, the impugned order/Notification dated 15-06-2009

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may kindly be varied/modified to the extent that the same may kindly be made effective from 13-11-2007 instead of immediate effect and as such the Department may kindly be directed to consider the promotion of the appellant to BS-17 (regular) from 13-11-07 instead of immediate effect with all other service benefits. Any other remedy/relief available in the circumstances of the case may also kindly be granted to the appellant.

~~Deedar~~
Appellant
through 

(Syed Younus Jan)
Advocate, High Court, Peshawar

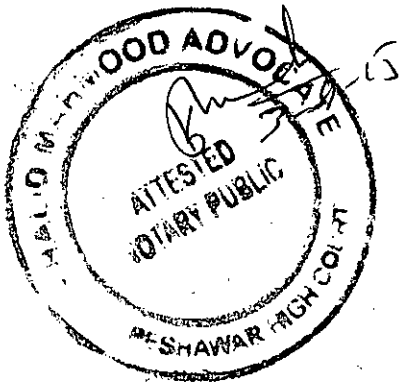
PESHAWAR

-09-2015

AFFIDAVIT

I, Deedar Khan, (the appellant) do hereby solemnly affirm and declare on oath that the contents of this appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

~~Deedar~~
Deponent



5

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. _____ / 2015

Deedar Khan Appellant

Versus

The Chief Secretary, Govt. of K.P.K.
and others Respondents.

ADDRESSES OF THE PARTIES

Appellant

Deedar Khan, Director Physical Education (D.P.E)
Government Higher Secondary School, Chamkani,
District Peshawar.

Respondents

1. The Chief Secretary, Govt. of K.P.K.
Civil Secretariat, Peshawar.


- Education
2. Secretary Elementary and Secondary Khyber Pakhtoonkhwa
Civil Secretariate Peshawar.
 3. The Director Elementary and Secondary Education Khyber
Pakhtoonkhwa near Govt. Higher Secondary School Peshawar
City GT Road Peshawar.
 4. The Secretary Establishment Department Khyber Pakhtoonkhwa
Civil Secretariate Peshawar.
 5. The Secretary Finance Department Khyber Pakhtoonkhwa
Civil Secretariate Peshawar.

Dated:

/2015

Appellant _____

Through:


(SYED FOUNUS JAN)
Advocate Peshawar High Court
Peshawar.

(6)

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR

Appeal No. _____ / 2015

Deedar Khan Applicant/Appellant

Versus

The Chief Secretary, Govt. of K.P.K.
and others Respondents.

APPLICATION FOR CONDONATION OF DELAY (IF ANY).

Respectfully submitted:

The applicant/appellant submits as under:-

That firstly the act and omission of the respondents /department is illegal, unconstititutional and void and secondly as financial matter is involved in the matter and the cause of action is the running cause of action, therefore, no limitation runs against the appellant/applicant, but even if this Honourable Tribunal considers the departmental appeal time barred then this application for dondonation of delay if any on the following amongst other grounds:-


GROUNDS:

1. That in the matter in hand the cause of action is continuous cause of action and the impugned act and omission of the respondents come in the purview of the definition of continous wrong, therefore, in the matter the cause of action starts on first date and ends on the last date of every months/every year, therefore, no question of delay arises in the matter.
2. That the law requires that the matters should/must be decided on merits rather than on technical grounds including the limitation.

3. That the appellant/applicant has got a very good case in his favour therefore, technicalities including the point of limitation(The delay if any) are ignorable.
4. That the appeal of the appellant before this Honourable Tribunal is well within time and strictly in accordance with law contained in Section 4 of the NWFP now Khyber Pakhtunkhwa Service Tribunal Act 1974,
5. That if the delay if any is not condoned the applicant/appellant will suffer an irreparable loss to his seniority, promotion and all other service benefits.
6. That the delay if any has been caused by the delaying tactics of respondents/department and the appellant cannot be held responsible for the same.
7. That in so many similar and identical cases this Honourable Tribunal has ignored the point of limitation and in so many cases has condoned the delay, therefore, in this case also the same point is ignorable/condonable.

It is, therefore, respectfully prayed that on acceptance of this application in the best interest of justice the delay if any in filing departmental appeal may kindly be condoned/ignored and the appeal of the appellant/applicant may kindly be decided on merits. Any other remedy/relief available in the circumstances of the case may also kindly be granted to the applicant/appellant.

Dated 19/2015

Applicant/Appellant
Through 
(Syed Younus Jan)
Advocate Peshawar High Court
Peshawar.

8

BEFORE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR.

Appeal No. _____ / 2015

Deedar Khan Applicant/Appellant

Versus

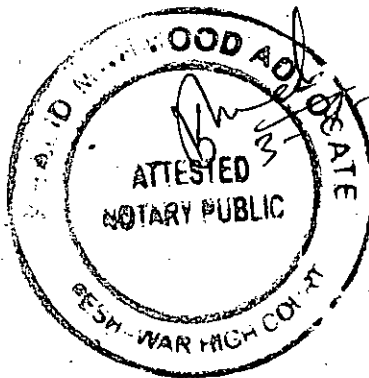
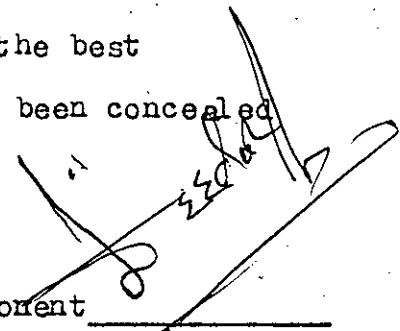
The Chief Secretary, Govt. of K.P.K.
and others Respondents.

AFFIDAVIT.

I, Deedar Khan applicant (appellant) to hereby solemnly affirm and declare on Oath that the contents of the attach application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal

Dated 19/2015

Deponent _____



To

The Worthy Chief Secretary,
K.P.K. Peshawar.

Subject:- DEPARTMENTAL APPEAL/REPRESENTATION.

Through PROPER CHANNEL

Sir,

1. That the applicant/appellant is M.A/M.Sc. in Health and Physical Education whose result was declared on and was regularly appointed/promoted against the post of DPE (HPS-16) vide order dated
2. That in 2007 the Government of K.P.K. issued the letter/Notification vide which the posts of D.P.Es. were upgraded from BS-16 to BS-17 regular for the existing incumbents who hold Master Degree in relevant subject i.e. M.A/M.Sc. in Health & Physical Education in case of the applicant.
3. That in light of the above referred letter of the Provincial Government the appellant/applicant is/was highly qualified, fit and eligible for the award of regular BPS-17 but has illegally, un-constitutionally and mala fide been ignored for the same.
4. That now the appellant/applicant has been promoted to regular HPS-17 but with immediate effect instead of 13-11-07 vide order dated 27-05-2009.
5. That the applicant/appellant agitated the matter with the authority but of no use, hence this appeal/representation.

Your goodself is therefore, requested, sir, that the letter/Notification dated 19-05-09 may kindly be made effective from 13-11-2007 instead of immediate effect and as such the regular promotion of the appellant to BS-17 regular may kindly be considered from 13-11-07 instead of immediate effect with all other service benefits.

PESHAWAR

22-05-2015

[Handwritten signature]

Advocate High Court Peshawar
Federal Government

Appellant

[Handwritten signature]
Ms. D.P.E
G. H. S. S. Chanderi



(1)
GOVERNMENT OF NWFP
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the 15-6-2009.

Annex "B"
10

NOTIFICATION

NO.SO(PE)2-6/E&SE/DPCMEETING/LIB/09: Consequent upon recommendations of the Departmental Promotion Committee, the competent authority is pleased to promote the following Twenty Three (23 Male) & Thirteen (13 Female) DPEs from BS-16 to BS-17 according to their seniority on regular basis with immediate effect:-

MALE DPEs

S.No	Name & Designation of Officers	Place of Posting	Remarks
1.	Mr. Abdul Hameed ADO's (sports) O/O EDO E&SE Lakki	GHSS Langarjal Abbottabad.	Against Vacant Post
2.	Mr. Amanullah Khan DPE GHSS Tajazai Lakki	GHSS Tajazai Lakki	Already occupied by him
3.	Q.S. Mohibullah Shah DPE GHSS Karak	GHSS Karak	-do-
4.	Muhammad Aslam DPE GHSS Abdul Khel Lakki	GHSS Abdul Khel Lakki	-do-
5.	Mr. Sardar Ali DPE GHSS Ghani Dehri Malakand Dargai	GHSS Ghani Dehri Malakand Dargai	-do-
6.	Muhammad Hashim DPE GHSS No. 3 Peshawar City	GHSS No.3 Peshawar City	-do-
7.	Muhammad Saeed ADO (Sports) EDO E&SE Swabi	GHSS Rhich Bhan Abbottabad	Against Vacant Post
8.	Muhammad Ibrahim ud Din DPE GCPE (M) Karak	GHSS Boi Abbottabad	-do-
9.	Mr. Deedar Khan DPE GHSS Chamkani Peshawar	GHSS Chamkani Peshawar	Already occupied by him
10.	Mr. Abdul Sattar DPE GHSS, Gul Imam Tank	GHSS Gul Imam Tank	-do-
11.	Muhammad Saeed Shah DPE GHSS Kawi Manshara	GHSS Kawi Manshara	-do-
12.	Mr. Khaki Rehman DPE GEC (M) Mir Ali NWA	GEC (M) Mir Ali NWA	-do-
13.	Mr. Habib Ullah DPE GHSS Dargai Charsadda	GHSS Dargai Charsadda	-do-
14.	Mr. Habibullah DPE GHSS Mamash Khel Bannu	GHSS Mamash Khel Bannu	-do-
15.	Mr. Zahoor Ahmad DPE GHSS Manki Sharif Nowshera	GHSS Manki Sharif Nowshera	-do-
16.	Mr. Lal Bacha DPE GHSS Mansabdar Swabi	GHSS Mansabdar Swabi	-do-
17.	Abdur Rauf DPE GHSS Wadpaga Peshawar	GHSS Wadpaga Peshawar	-do-
18.	Mr. Fakhr Zaman Shah DPE, GHSS Dhand Saghri, Kohat	GHSS Dhand Saghri, Kohat	-do-
19.	Mr. Wali-ur-Rehman DPE, GCPE Karak	GCPE Karak	-do-
20.	Mr. Kamran Ali, DPE GHSS, Nagri Bunair	GHSS Nagri Bunair	Already occupied by him
21.	Mr. Muhammad Iqbal, DPE GHSS Tehkal Bala Pesh:	GHSS Tehkal Bala Pesh:	-do-
22.	Muhammad Arif DPE, GHSS Bam Khel Swabi	GHSS Bam Khel Swabi	-do-
23.	Mr. Zard Ali Khan DPE GHSS Urmar payan Peshawar	GHSS Urmar payan Peshawar	-do-

M. Usaid Muhammad/Kaleem Khan Mahsood/Final Notification/09

(P.T.O.)

Attested
BYED YOUSUF JAM
B.A.B.S. 8 Ed. Certificate No. 243
Advocate High Court Peshawar
Federal Shariat Court.

FEMALE DPEs


S.No	Name & Designation of Officers	Place of Posting	Remarks
1	Mst. Samina Habib DPE RITE(F) Kohat.	RITE(F) Kohat.	Already occupied by her
2.	Mst. Gul Nar DPE GGHSS Comp: Abbottabad.	GGHSS Comp: Abbottabad.	-do-
3.	Mst. Abida Parveen DPE GGHSS Malakpura Abbottabad	GGHSS Malakpura Abbottabad	-do-
4.	Mst. Robina Shaheen DPE GGHSS S.K.Bala Bannu.	GGHSS S.K.Bala Bannu.	-do-
5.	Mst. Sughra Afandi DPE GGHSS Gujrat Mardan.	GGHSS Gujrat Mardan.	-do-
6.	Mst. Sujhaat Begum DPE GGHSS Takhtbhai Mardan	GGHSS Takhtbhai Mardan	-do-
7.	Mst. Saima Gul DPE GGHSS Topi Swabi	GGHSS Topi Swabi	-do-
8.	Mst. Sadia Hazrat DPE GGHSS Kopar Malakand	GGHSS Kopar Malakand	-do-
9.	Mst. Salra Ilaf DPE GGHSS Abbottabad	GGHSS Abbottabad	-do-
10.	Mst. Dil Afroz DPE GGHSS Utmanzai Charsadda	GGHSS Utmanzai Charsadda	-do-
11.	Mst. Robina Shaheen DPE GGHSS Kallang Mardan.	GGHSS Kallang Mardan.	-do-
12.	Mst. Riffat Shaheen DPE GGHSS Garhi Habibullah Mansehra	GGHSS Garhi Habibullah Mansehra	-do-
13.	Mst. Arifa Saleem DPE GGHSS Khairabad Nowshera	GGHSS Khairabad Nowshera	-do-

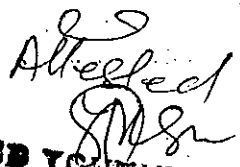
**SECRETARY TO GOVT OF NWFP
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

Endst; of even no. & date:

Copy is forwarded to:-

- 1) Secretary to Govt of NWFP, Establishment Department, Peshawar.
- 2) Special Secretary (Regulation), Establishment Department, Govt of NWFP Peshawar.
- 3) Secretary to Govt. of NWFP, Finance Department, Peshawar.
- 4) Director (E&SE) NWFP Peshawar.
- 5) Executive District Officer (E & SE) concerned.
- 6) The Accountant General NWFP.
- 7) District Accounts Officer concerned.
- 8) Deputy Database Administrator (EMIS) Elementary & Secondary Education Peshawar.
- 9) PA to Secretary Elementary & Secondary Edu: Department
- 10) Officer concerned
- 11) Master file


(ARIF JAMIL.)
SECTION OFFICER
(PRIMARY)

Attested

SYED YOUSUF JAN
B.A.L.L.B. B Ed. Certificate Sharni Law
Advocate High Court Peshawar
Federal Shariat Court.

Annex "C"

12

GOVERNMENT OF N.W.F.P.
SCHOOLS & LITERACY DEPARTMENT
Dated, Peshawar the 13/11/2007.

NOTIFICATION.

No. SOG/S&L/1-69/06/Vol-1/DPE/LIB: Sanction of the competent authority is hereby accorded to the upgradation of the posts of Librarians and Directors Physical Education (D.P.Es) from BS-16 to BS-17 (Regular) for the existing incumbents who hold Master Degree in the relevant subject in the Schools & Literacy Department NWFP with immediate effect as per following details:-

- 1) Promotion against the upgraded posts (from BS-16 to BS-17) shall be made in the prescribed manner and in accordance with the service rules to be framed as per relevant provisions of the NWFP Civil Servants (Appointment, Promotion and Transfer) Rules 1989 read with the NWFP Civil Servants Act, 1973.
- 2) The Librarians and D.P.Es who hold the diploma in the relevant subject will stay in BS-16 till such time, they acquire Master degree in the respective subject. On acquiring Master Degree in the relevant subject, their posts will be upgraded on case to case basis from BS-16 to BS-17 (Regular) and promotion (from BS-16 to BS-17) would be given as per laid down procedure and in accordance with the service rules to be framed. However their existing seniority will remain intact.
- 3) All the vacant posts of Librarians and D.P.Es in Schools & literacy department in BS-16 are hereby upgraded to BS-17, appointments against which would be made from amongst the persons who hold Master degree in the relevant subject, in the prescribed manner.
- 4) In future Librarians and D.P.Es will initially be recruited on the basis of Master degree in the relevant subject in BS-17 (Regular).
- 5) Henceforth no appointment of Librarians and D.P.Es in BS-16 shall be made on the basis of diploma, being declared as "Dying Cadre".

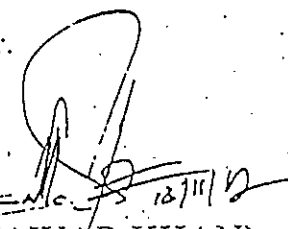
Sd/-

SECRETARY TO GOVERNMENT OF NWFP
SCHOOLS & LITERACY DEPARTMENT.

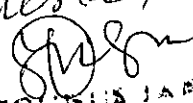
Endst: No. FD (SOSR-II) 10-7/03/VOL.-III Dated, Peshawar the, 13/11/2007

Copy is forwarded for information and necessary action to :-

- 1) The Accountant General, NWFP, Peshawar.
- 2) All District Accounts Officers in NWFP.
- 3) All Agency Accounts Officers in NWFP.


(MUNAWAR KHAN)
SECTION OFFICER (SR-11)
FINANCE DEPARTMENT
GOVERNMENT OF NWFP.

(P.T.O.)

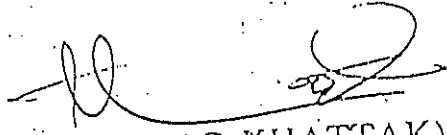
Attested

SYED YOUNIS JAMI
B.A., B.Ed. Certificate holder
Advocate High Court Peshawar
Federal Shariat Court.

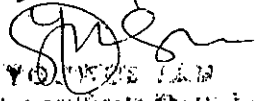
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Endst:No. & Date Even.

Copy is forwarded to:-

- 1) Secretary to Government of NWFP, Establishment Department.
- 2) Secretary to Government of NWFP, Finance Department.
- 3) P.S to Chief Minister NWFP, Peshawar.
- 4) P.S to Chief Secretary NWFP, Peshawar.
- 5) Director Schools & Literacy, NWFP, Peshawar.
- 6) Director, Curr: & Teachers Edu; NWFP, Mandian Abbottabad.
- 7) Director of Education FATA NWFP, Peshawar.
- 8) P.S to Minister of Education, NWFP, Peshawar.
- 9) P.S to Secretary Schools & Literacy NWFP, Peshawar.
- 10) Office File.


(FARID AHMAD KHATTAK)
SECTION OFFICER (GENERAL)
SCHOOLS & LITERACY DEPARTMENT
GOVERNMENT OF NWFP.

Attested


BYED YOUSUF KHAN
B.A.B. 821, Certificate Khatta 205
Advocate High Court Peshawar
Federal Shariat Court.

Serial No. GU-00305

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

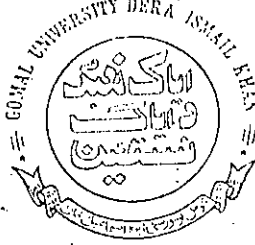
Annex D¹⁹ 12

GOMAL UNIVERSITY

1988

DERA ISMAIL KHAN

(N.Y.F.P) PAKISTAN



VERIFIED

Controller of Examinations
Gomal University,
Dera Ismail Khan

12/5/09

(Session 1986-87)

DEEDAR KHAN, Son of Dost Muhammad and

a student of the DEPARTMENT OF PHYSICAL EDUCATION,

having passed the prescribed examination in SEPT/OCTOBER, 1988,

is this day admitted by the Gomal University to the DEGREE of

MASTER OF SCIENCE

in the SECOND Class

The subject of examination being H.P.E.

The Examination was taken ~~as a whole~~ / in parts.

Registered No. 100-PEOU-83

Roll No. 3512

MAY 4 19 88

Countersigned

Controller of Examinations

Vice-Chancellor

Attested
[Signature]

BYED YOUSUF JAN
B.A.B.B. & Co. Chartered Accountants
Associate High Court Passes
Federal Shariat Court.

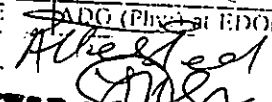
DIRECTORATE OF SCHOOLS AND LITERACY N.W.F.P. PESHAWAR.

OFFICE ORDER.

Annex E 15

Consequent upon the approval by the Departmental Selection Committee Schools & Literacy NWFP in its meeting held on 26-12-2002. The following CT/PET/PTC, etc are hereby promoted to the posts of DPE/ADO (Physical) B-16 on regular basis in the interest of public service with immediate effect.

S.#	Name & Designation	Promoted as	Place of posting	Remarks
1	Mr. Sher Azam Khan PET	DPE	GEC, Ghorl Wala Bannu	Against the post already occupied by him
2	Mr. Siraj-ud-Din PET	DPE	GHSS, Khowaza Khela Swat	Against the post already occupied by him
3	Muht Ibrahim-ud- Din PET	DPE	GHSS, Lachi Kohat	Against the post already occupied by him
4	Mr. Bahadar Nawaz PET	DPE	GHSS No. 2 Pesh: Canutt	Against the post already occupied by him
5	Mr. Falak Naz PET	DPE	GHSS Manga Dargai Charsadda	Against the post already occupied by him
6	Mr. Deedar Khan PET	DPE	GHSS Chaunkani Peshawar	Against the post already occupied by him
7	Mr. Muhammad Jatal PET	DPE	GHSS Kakri Bannu	Against the post already occupied by him
8	Mr. Abdus Sattar PET	DPE	GHSS Gul Imam Tank	Against the post already occupied by him
9	Mr. Jamal Abdul Nasir PET	DPE	GHSS Totakan Mkd Agy:	Against the post already occupied by him
10	Muht Faisal Phy: Supervisor	DPE	GHSS Daag Peshawar	Against the post already occupied by him
11	Mr. Muhammad Naem PET	DPE	GHSS Ghahri Kapura MDN	Against the post already occupied by him
12	Mr. Saukat Hayat PET	DPE	GHSS Kot Malakand Agy:	Against the post already occupied by him
13	Mr. Bashir Ahmad PET	DPE	GHSS Dosehra Char: da	Against the post already occupied by him
14	Mr. Shamal Khan PET	DPE	GHSS Dara Pezu Lak:	Against the post already occupied by him
15	Mr. Aqal Daraz PET	DPE	GHSS Tough Bala Kohat	Against the post already occupied by him
16	Mr. Azizullah Khan PET	DPE	GHSS Kotgarh D I Khan	Against the post already occupied by him
17	Abdul Majeed Phy: Supervisor	DPE	GEC (M) Peshawar	Against the post already occupied by him
18	Mr. Muhibullah PET	DPE	GHSS Nizampur NSR	Against the post already occupied by him
19	Mr. M. Saeed Shah PET	DPE	GHSS Kawai Mausehra	Against the post already occupied by him
20	Mr. S. Bakht Shah PET	DPE	GHSS Zaida Sawabi	Against the post already occupied by him
21	Mr. Hameedullah Khan PET	DPE	GHSS Dalki D. I. Khan	Against the post already occupied by him
22	Mr. Muhammad Israr PET	DPE	GHSS Baghdad Mardan	Against the post already occupied by him
23	Mr. Naem Khan PET	DPE	Phy: Edu: Collage Karak	Against the post already occupied by him
24	Mr. Shah Mehmood PET	DPE	GHSS Umar Puyan Pesh:	Against the post already occupied by him
25	Mr. Tali Zar Khan PET	DPE	GHSS Kallang Mardan	Against the post already occupied by him
26	Mr. Rais Khan PET	DPE	GHSS Kheshgai NSR	Against the post already occupied by him
27	Mr. Inayat Khan PET	DPE	GHSS Umar Zai Chd:	Against the post already occupied by him
28	Mr. Sardar Khan PET	DPE	GHSS Mayar Mardan	Against the post already occupied by him
29	Mr. Ihtishamud Din PET	DPE	GHSS Bilitang Kohat	Against the post already occupied by him
30	Mr. Abdullah Shah PET	DPE	ADO (Phy:) at EDO (S&L) Tank	Against the post already occupied by him
31	Mr. Rukh Niaz PET	DPE	GHSS Khamsi Pst Abbottabad	Against the post already occupied by him
32	Mr. Abdul Ghaffar PET	DPE	GHSS Lal Qilla Dir	Against the post already occupied by him
33	Mr. Gul Badshah PET	DPE	GHSS Hazar Khwani Pesh:	Against the post already occupied by him
34	Mr. Muhammad Safdar PET	DPE	GHSS Doaba Kohat	Against the post already occupied by him
35	Mr. Safdar Jan PET	DPE	GHSS No. 1 Peshawar city	Against the post already occupied by him
36	M. Fazli Rabbi PET	DPE	GHSS Totalai Buner	Against the post already occupied by him
37	Mr. Khaki Rehman PET	DPE	GEC (M) Mir Ali NWA	Against the post already occupied by him
38	Mr. Roshan Akber PET	DPE	GHSS Gandaf Swabi	Against the post already occupied by him
39	Mr. Habibullah PET	DPE	ADO (Phy) at EDO (S&L) Charsadda	Against the post already occupied by him
40	Mr. Lal Marjan PET	DPE	GHSS Shahqadar For. Id:	Against the post already occupied by him
41	Mr. Ahmad Nawaz PET	DPE	ADO (Phy:) at EDO (S&L) Battagram	Against the post already occupied by him
42	Mr. Zar Bahisht Khan PET	DPE	ADO (Phy:) at EDO (S&L) Buner	Against the post already occupied by him
43	Mr. Kiramatullah PET	DPE	GHSS Bogara Karak	Against the post already occupied by him
44	Mr. Salar Khan PET	DPE	GHSS Baghicha Dheri Mardan	Against the post already occupied by him
45	Mr. Rashi Din PET	DPE	GHSS Warana Karak	Against the post already occupied by him
46	S. Fazal Abbas Zaidi PET	DPE	GHSS Utmanzai Charsadda	Against the post already occupied by him
47	Mr. Falak Naz PET	DPE	GHSS Adezai Peshawar	Against the post already occupied by him
48	Mr. Fazli Wahid PET	DPE	GHSS Khanpur Dir	Against the post already occupied by him
49	Mr. Mushtaq Khan PET	DPE	GHSS Wazir Bagh Peshawar	Against the post already occupied by him
50	Mr. Arbab Fawad Khalil PET	DPE	ADO (Phy:) at EDO (S&L) NSR	Against the post already occupied by him


SYED YOUSUF TAN
 B.A.L.S. B Ed. Certificate
 Advocate High Court Peshawar

16

51	Mr. Habibullah PET	DPE	GEC (M) Dir	Against the post already occupied by him
52	Mr. Mujeebur Rehman PET	DPE	GHSS Shakar Dara Kohat	Against the post already occupied by him
53	Mr. Jehan Alam PET	DPE	ADO (Phy:) at EDO(S&L) Shangla	Against the post already occupied by him
54	Mr. Abdul Qadeer Khan PET	DPE	GHSS, Parova D.I.Khan	Against the post already occupied by him
55	Mr. Chamni Khan PET	DPE	GHSS, Takkar GHSS Mardan	Against the post already occupied by him
56	Mr. Amjad Khan PET	DPE	GHSS Sherpani Charsadda	Against the post already occupied by him
57	Mr. Nikhat ullah PET	DPE	GEC (M) Kotka Habibullah FK Bamu	Against the post already occupied by him
58	Mr. Farid Zaman C.T.	DPE	Phy:Edu:Collage Karak	Against the post already occupied by him
59	Mr. Ikramullah PET	DPE	GHSS Sirkot Haripur	Against the post already occupied by him
60	Mr. Muhammad Usman PET	DPE	GHSS Muryali D.I.Khan	Against the post already occupied by him
61	Mr. Waris Khan P.T.C.	DPE	GHSS Munda Dir Lower	Against the post already occupied by him
62	Mr. Muhammad Nawaz PET	DPE	GHSS Shabaz Ghari Mardan	Against the post already occupied by him
63	Mr. Ihsan Ullah PET	DPE	GHSS Fatehpur Swat	Against the post already occupied by him
64	Mr. Ashraf Ali Khan PET	DPE	GHSS Dairzal Kohat	Against the post already occupied by him
65	Mr. Zahoor Zaman P.T.C.	DPE	GHSS Kalam Swat	Against the post already occupied by him
66	Mr. Fatch Sher PET	DPE	GHSS Kabal Swat	Against the post already occupied by him
67	Mr. Muhammad Sharif PET	DPE	GHSS Kot Najibullah II/Pur	Against the post already occupied by him
68	Mr. Said Khan PET	DPE	GHSS Lora Abbottabad	Against the post already occupied by him
69	Mr. Ghulam Hussain PET	DPE	GEC(M) Mardan	Against the post already occupied by him
70	Mr. Ghulam Nabi PET	DPE	GHSS Takh Bhai Mardan	Against the post already occupied by him
71	Mr. Muhammad Gul PET	DPE	GHSS No.2 D.I.Khan	Against the post already occupied by him
72	Mr. Raeesullah P.T.C.	DPE	GHSS Charbagh Swat	Against the post already occupied by him
73	Mr. Nasir Khan PET	DPE	ADO (Phy:) at EDO (S&L)Hangu	Against the post already occupied by him
74	Mr. Zahoor Ahmad PET	DPE	GHSS Jallozai Nowshera	Against the post already occupied by him
75	Mr. Muhammad Haroon PET	DPE	GHSS Ismaila Swabi	Against the post already occupied by him
76	Mr. Muhammad Iqbal PET	DPE	GHSS Turbela T.Ship H/Pur	Against the post already occupied by him
77	Mr. Farmanullah PET	DPE	GHSS Pir Pai Nowshera	Against the post already occupied by him

- Note: -
1. Charge report should be submitted to all concerned.
 2. No TA/DA etc. are allowed.

(HAFIZ BAHADAR KHAN)
Director Schools & Literacy
NWFP Peshawar

Endst No. 3542-3628 1A-14/Promo:/DPE B-16.

Dated Peshawar the 18/2 /2003

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

1. Director of Education (FATA) NWFP Peshawar.
2. Director Bureau and Teacher Education NWFP Abbottabad.
3. Accountant General NWFP Peshawar.
4. Executive District Officers (Schools & Literacy) in NWFP.
5. District/Agency Accounts Officers in NWFP.
6. Principal GRC (M) concerned.
7. Principal Govt. College of Physical Education Karak.
8. Principal GHSS concerned.
9. PS to Minister for Education NWFP Peshawar.
10. PS to Secretary Schools & Literacy Department Govt. of NWFP Peshawar.
11. DPE/ADO-Physical concerned.
12. PA to Director Schools & Literacy NWFP Peshawar.

Attested
[Signature]

[Signature]
Deputy Director Establishment
Directorate Schools & Literacy
NWFP Peshawar.