


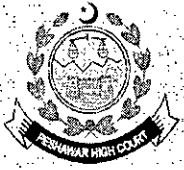
Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 568/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	14/03/2023	<p>The present appellants initially went in Writ Petition before the Hon'ble Peshawar High Court Peshawar and the Hon'ble High Court vide its order dated 03.11.2022 while treating the Writ Petition into an appeal and has sent the same to this Tribunal for decision in accordance with law. This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put up there on _____</p> <p>By the Order of Chairman</p> <p> REGISTRAR</p>



The
PESHAWAR HIGH COURT
Peshawar

Ph: No. 091-9210149-58

No. 68846 (1)/2628/2023/WP-MN

Dated. 09-March-2023

From

Deputy Registrar (J),
Peshawar High Court,
Peshawar.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 4343

Date 14/3/2023

To

✓ The Chairman, Khyber Pakhtunkhwa, Service Tribunal, Peshawar.

Subject: Writ Petitions W.P 4597/2018 Title: Anzar Gul VS Director of Education FATA Secretariat

Memo,

I am directed to send herewith the titled case in original alongwith all annexures and judgment of this Honble Court dated 03.11.2022 for compliance.

Fz Deputy Registrar (J)

10/3/23

Encl: As above.

(7)

PESHAWAR HIGH COURT, PESHAWAR
(JUDICIAL DEPARTMENT)

WP No. 4597-P/2018

Anzar Gul and others

.....Petitioners.

V/s

Director of Education,
FATA Secretariat,
Peshawar and others.

.....Respondents.

For the Petitioners:

Mr. Saadullah Khan Marwat,
Advocate.

For the Respondents:

Syed Sikandar Hayat Shah,
AAG.

Date of hearing:

03.11.2022

JUDGMENT

SYED ARSHAD ALI, J:- The petitioners, through the instant constitutional petition, have approached this Court praying that:-

"It is, therefore, most humbly prayed that on acceptance of the Writ Petition, in exercise of the extraordinary constitutional jurisdiction, this hon'ble Court may graciously be pleased to:

- a. Declare notification dated 29.08.2018 of R. No.01 to be illegal, improper, unjust, discriminatory, malafide, without lawful authority and of no legal effect.*
- b. Direct the authority to regularize the initial service of the petitioners rendered in the Community Schools to the regular service for pensionary and other benefits; AND/OR*
- c. Any other writ/order/direction deemed proper and just in the circumstances of the case be also issued/ordered/given."*

2. Short but relevant facts of the case as alleged in petition are that the petitioners were appointed as Community School Teachers in a Project on contract basis and later, their services were regularized against the regular posts of PST vide orders dated 02.11.2015, 07.01.2016, 08.01.2016 & 20.07.2016, however, it is the claim of petitioners that the services

rendered by them on contract basis for more than ten years have not been counted towards pensionary benefits, against which, they filed representation before the Director Education FATA Secretariat, Peshawar on 22.03.2017, but, the same was regretted vide Notification dated 29.08.2018; hence, the instant Writ Petition.

3. Respondents No. 1, 2 & 5 have furnished their comments wherein it is alleged that the petitioners were appointed as Community School Teachers in a Project, however, the said Project was closed on 31.12.2010. Later, after revised PC-1, the community schools were reopened in the year, 2011-2012 and the petitioners were adjusted against regular posts in view of Notification dated 11.05.2012. The said Notification was challenged by some other persons before this Court through various constitutional petitions and this Court vide judgment dated 06.08.2013 rendered in WP No. 2662/2012 declared the said Notification as policy for recruitment of new candidates in future; hence, this petition is hit by principle of resjudicata and requested for its dismissal.

4. Arguments heard and record perused.

5. Perusal of the record reveals that the petitioners were appointed against the project posts of PTC and were posted as Communal School Teachers in Boys Communal Schools at different places in the erstwhile FATA. Initially, contract/project posts were for a period of three years which was then extended from time to time; however, in view of the wave of militancy and then Army operation, these community's schools became non-functional and were closed and the services of the Communal School Teachers were terminated w.e.f. 31.12.2010. It is pertinent to mention here as alleged by the respondent that most of the appointees were not holding the prescribed qualification at the relevant time. Later, it was decided vide Notification dated 29.10.2015 to appoint/adjust the Communal School Teachers against the regular posts of PST in case they are holding the prescribed

qualification and that it was in view of the decision of the Government that the petitioners were regularized/ adjusted through different letters available on the file. In the instant case, the petitioners have two main claims i.e. regularization from retrospective effect and counting of their previous project/contract service for the purpose of pension.

6. Admittedly, by now the petitioners have acquired the status of civil servants and the relief claimed through the instant petition relates to the enforcement of their terms and conditions of service. This Court under Article 212 of the Constitution of Islamic Republic of Pakistan, 1973 has no jurisdiction to interfere in the matter. However, this case is pending before this Court since 2018, therefore, instead of dismissing this petition on question of jurisdiction, this petition be transmitted to Worthy Khyber Pakhtunkhwa Service Tribunal for adjudication on merit. Copy of this petition be retained in office while the original file along with the annexure be sent to the Worthy Tribunal.

7. Disposed of in the above terms.

ANNOUNCED.

03.11.2022



Chief Justice



Judge

=====

A

THE PESHAWAR HIGH COURT, PESHAWAR
OPENING SHEET FOR WRIT BRANCH

Date of Filing: 16.11.2019

District:

Case Type; Writ Petition

Nature of Original Proceedings:

Category Code

5	0	7	1	0
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(Categories & Sub categories are given at the back of the opening sheet)

Review/ Contempt of Court in respect of:

Writ of:

Heabus Corpus	Prohibition	Mandamus ✓	Qua Warranto	Certiorari
------------------	-------------	---------------	-----------------	------------

If Certiorari:

Forum	Date	Interlocutory/ Final Order	Case Pertains to
			<input type="checkbox"/> SB
			<input checked="" type="checkbox"/> DB

Petitioner Name	Anzer Gul & Others
Mobile No.	0308-5331712
Address	Government Primary School Saeed Ullah Jan Kalley, District Khyber
CNIC No.	21201-2701312-5
Email Address	

Counsel for Petitioner(s)	Saadullah Khan Marwat
Mobile No.	0311-9266609 0333-9107737
Address	Office: 21-A Nasir Mansion, Shoba Bazar, Peshawar.
CNIC No.	17301-5715943-7
Email Address	handsome9946@gmail.com

Respondents	1. Director, Elementary & Secondary Education Department, KP, Peshawar. Etc.
Address	As Per Review Petition.

ORIGINAL ORDER/ ACTION/ INACTION COMPLAINED OF:
To review judgment dated 30-10-2019.

PRAYER
Respondents be directed to regularized services of petitioners in service with all consequential benefits.

LAW/ RULES/ GOVERNING THE ORIGINAL PROCEEDINGS/ ACTION/ LOCATION
Constitution of Pakistan , 1973,

Signature

Note: Any suggestion to improve the pre-format will be appreciated.

FILED TODAY
Deputy Registrar
18 NOV 2019

Before the Peshawar High Court Peshawar

CHECK LIST.

Case Title: <i>Amber Gul & others</i>Versus..... <i>Director & others.</i>			
1.	Case is duly signed.	YES	NO
2.	The law under which the case is preferred has been mentioned.	YES	NO
3.	Approved file cover is used.	YES	NO
4.	Affidavit is duly attested and appended.	YES	NO
5.	Case and annexure are properly paged/ numbered according to index.	YES	NO
6.	Copies of annexure are legible and attested. If not, then better copies duly attested have been annexed.	YES	NO
7.	Certified copies of all the requisite documents have been filed.	YES	NO
8.	Certificate specifying that no case on similar grounds was earlier submitted in this court, filed.	YES	NO
9.	Case is within time.	YES	NO
10.	The value for the purpose of court fee and jurisdiction has been mentioned in the relevant column.	YES	NO ✓
11.	Court fee in shape of stamp paper is affixed. (for writ Rs.500, for other was required).	YES	NO
12.	Power of attorney is in proper form.	YES	NO
13.	Memo of addresses filed.	YES	NO
14.	List of books mentioned in the petition.	YES	NO
15.	The requisite number of spare copied attached. (Writ Petition-3 Nos, Civil Appeal (SB-1, DB-2) Civil Revision (SB-1, DB-2)).	YES	NO
16.	Case (Revision/appeal/petition etc.) is filed on the prescribed form.	YES	NO
17.	Power of attorney is attested by jail authority (for jail prisoner only).	YES	NO ✓

It is certified that formalities/documents as requires in column 2 to 18 above, have been fulfilled.

Signature. *Saeed Ullah Khan*

Saeed Ullah Khan
Advocate Peshawar.

Date: 18/09/2018 *18/9/18*

For office use only:

Case No. _____

Case received. _____

Complete in all respect; Yes/No (if No the grounds) _____

Date in court. _____

Signature. _____

(Reader)

Countersigned _____

Date. _____
(Deputy Registrar)

RECORDED
18 SEP 2018

IN THE PESHAWAR HIGH COURT, PESHAWAR

Review Pett: No. 231 P /2019

IN

W.P No. 4597-P / 2018

Anzar Gul & Others

versus

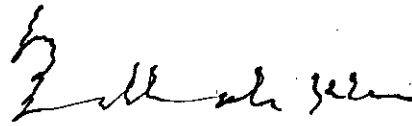
Director & Others

I N D E X

S.#	Description of Documents	Annex	Page
1.	Opening Sheet		A
2.	Review Petition		1-18
3.	Affidavit		19
4.	Copy of W. P No. 4597-P/18 dated 17-09-18	"A"	20-25
5.	Judgment of the HC: dated 30-10-2019	"B"	26-31
6.	Restoration of services dated 28-10-2011	"C"	32-37
7.	Training / Workshop for teachers	"D"	38-39
8.	Wakalatnama		40-44

Petitioners

Through



(Saadullah Khan Marwat)
Advocate
21-A Nasir Mension,
Shoba Bazar, Peshawar.
Ph: 0300-5872676
0311-9266609

Dated: 16-11-2019



FILED TODAY
Deputy Registrar
18 NOV 2019

IN THE PESHAWAR HIGH COURT, PESHAWAR

Review Pett: No. 231 P/2019

IN

W.P No. 4597-P / 2018

1. Anzar Gul S/O Zar Din, PST,
Government Primary School,
Saeed Ullah Jan Kalley,
Bara District Khyber.
2. Sadiq Ahmad S/O Sher Jan, PST,
Government Primary School
Toor Dara Jamrood Khyber Agency.
3. Khial Gul S/O Zahir Shah, PST,
Government Primary School Toor Dara,
Jamrood Khyber Agency.
4. Mohibullah S/O Ihsan Ullah, PST,
Government Primary School Toora
Tara Jamrood Khyber Agency.
5. Irat Khan S/O Ilyas Khan, PST,
Government Primary School Jani Khel,
Jamrood Khyber Agency
6. Muhammad Jan S/O Allah Baz, PST,
Government Primary School Nazar
Kalley, Landi Kotal Khyber Agency
7. Arman Gul S/O Lal Mat Khan, PST,
Government Primary School
Rekaley Jamrood Khyber Agency.
8. Ameen Shah S/O Mustan Shah, PST,
Government Primary School
Choor No. 03, Jamrood Khyber Agency.
9. Rehman Gul S/O Ghirat Gul, PST,
Government Primary School Attari,
Jamrood Khyber Agency.
10. Sabit Khan S/O Gul Mar Jan, PST,
Government High School Choor,
Jamrood Khyber Agency.

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18 NOV 2019

11. Shah Wali S/O Payo Noor, PST,
Government Primary School
Fiazoo Kalley, Jamrood Khyber Agency.
12. Sajid Ahmad S/O Payo Khel, PST,
Government Primary School Wazir
Dand, Jamrood Khyber Agency.
13. Noorat Khan S/O Awal Khan, PST,
Government Primary School
Jawara Mania, Jamrood Khyber Agency.
14. Mushtaq Ullah S/O Abdul Qahar, PST,
Government Primary School
Nawar Mania, Jamrood Khyber Agency.
15. Tariq Khan S/O Khan Sahib Khan, PST,
Government Primary School Khan Mast
Kalley, Jamrood Khyber Agency.
16. Shufqat Ullah S/O Gul Said Khan, PST,
Government Primary School Khadim
Kalley, Jamrood Khyber Agency.
17. Jam Dad Khan S/O Jan Muhammad Khan,
PST, Government Primary School Wallo Milla,
Jamrood Khyber Agency.
18. Sher Zali S/O Khan Badshah, PST,
Government Primary School Meer
Ahmad Shah Kalley, Jamrood Khyber Agency.
19. Umar Khan S/O Lal Mat Khan, PST,
Government Primary School Redi Gul
Kalley, Jamrood Khyber Agency.
20. Saleh Jan S/O Khaista Meer, PST,
Government Primary School
Lashora Jamrood Khyber Agency.
21. Abdul Qadir S/O Abdul Jalil, PST,
Government Middle School Sher
Afzal Kalley, Jamrood Khyber Agency.
22. Muhammad Wakeel S/O Abdul Jalil, PST,
Government Primary School Kambila
Malagori, Khyber Agency.

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23. Fazale Rehman S/O Masooz Khan, PST,
Government Primary School Mian
Jaffar Shah Kalley, Jamrood Khyber Agency.
24. Istekhar Khan S/O Rooh Khan, PST,
Government Primary School Pastoki,
Landi Kotal Khyber Agency.
25. Farid Ullah S/O Kabal Sher, PST,
Government Primary School Gulab
Kalley, Landi Kotal Khyber Agency.
26. Serfarz Khan S/O Anwar Khan, PST,
Government Primary School Jawara
Mela, Malagori Khyber Agency.
27. Janab Khan S/O Shoghli Maan Khan,
PST, Government Primary School
Lashora Jamrood Khyber Agency.
28. Samad Meer S/O Muhammad Said,
PST, Government Primary School Lal
Mat Kalley, Jamrood Khyber Agency.
29. Islam Gul S/O Nabat Khan, PST,
Government Primary School Fazal
Ahmad Kalley, Jamrood Khyber Agency.
30. Gulab Sher S/O Aqal Meer, PST,
Government Primary School
Malak Sardar Meer Kalley,
Jamrood Khyber Agency.
31. Muhammad Saeed Khan S/O
Enzar Gul, PST, Government Primary
School Zabit Khan Kalley,
Jamrood Khyber Agency.
32. Umar Said S/O Sir Meer Khan, PST,
Government Primary School
Chapari, Jamrood Khyber Agency.
33. Hunar Said S/O Sir Meer Khan, PST,
Government Primary School Kambila,
Jamrood Khyber Agency.
34. Anzal Khan S/O Kazam Baig, PST,
Government Primary School
Gujjar Dand, Jamrood Khyber Agency.

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35. Fazal Rabi Khan S/O Ghulam Nabi, PST,
Government Primary School, Ali Masjid,
Jamrood Khyber Agency.
36. Mir Habib S/O Fazal Khan, PST,
Government High School Badshah
Meer Kalley, Jamrood Khyber Agency.
37. Wazir Khan S/O Said Ullah Khan,
PST, Government Primary School
Sandana, Bara Khyber Agency.
38. Khyal Batt Khan S/O Doulat Khan, PST,
Government Higher Secondary School
Speen Dand, Jamrood Khyber Agency.
39. Samin Gul S/O Zar Khalil, PST,
Government Primary School Sher
Bahadar Kalley, Bara Khyber Agency.
40. Yar Muhammad S/O Mirza Gul, PST,
Government Primary School Zareef Kalley,
Bara Khyber Agency.
41. Muhammad Khan S/O Shaus Khan, PST,
Government Primary School Raza Khan,
Bara Khyber Agency,
42. Miraj Gul S/O Zain Gul, PST,
Government Primary School Kotkai
Tirah, Bara Khyber Agency.
43. Abid Khan S/O Zain Gul, PST,
Government Primary School Zafar Khan
Kalley, Bara Khyber Agency.
44. Hujat Khan S/O Samand Khan, PST,
Government Primary School Azam Din,
Bara Khyber Agency.
45. Said Ghani S/O Anar Gul, PST,
Government Primary School Kotaki,
Bara Khyber Agency.
46. Siraj Akbar S/O Muqem Khan, PST,
Government Primary School Mamal Mela,
Bara Khyber Agency.

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Deputy Registrar
18 NOV 2019

47. Karna Khel S/O Talib Shāh, PST,
Government Primary School
Mashkanara Mela, Bara Khyber Agency.
48. Syed Ahmad S/O Lal Madar, PST,
Government Middle School
Sheen Kamar, Bara Khyber Agency.
49. Hameed Ullah S/O Afsar Khan, PST,
Government Primary School Choorā,
Bara Khyber Agency.
50. Iqbal Hussain S/O Zar Muhammad,
PST, Government Primary School
Zangai Bara Khyber Agency.
51. Shahid Khan S/O Muqam Din, PST,
Government High School Jafar Khan Kalley,
Bara Khyber Agency.
52. Suleman Shah S/O Gul Badshah,
PST, Government Primary School Pastoki,
Bara Khyber Agency.
53. Shah Je Khan S/O Gul Zameer, PST,
Government Primary School Zafar Kalley,
Bara Khyber Agency.
54. Abdul Qayum S/O Rehmat Gul, PST,
Government Primary School Gulab Khel,
Bara Khyber Agency.
55. Gul Amin S/O Angar Khan, PST,
Government Primary School
Khuramtan Kalley, Bara Khyber Agency.
56. Gul Zaman S/O Sturee Khan, PST,
Government Primary School
Yar Hamza Kalley, Bara Khyber Agency.
57. Raj Muhammad S/O Zahir Shāh,
PST, Government Primary School
Kotkai, Bara Khyber Agency.
58. Bakht Mar Jan S/O Qandahar Khan, PST,
Government Primary School Habib Shah,
Bara Khyber Agency.

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59. Raees Khan S/O Nauroz Khan, PST,
Government Primary School
Jafar Khan Kalley, Bara Khyber Agency.
60. Mir Akbar S/O Gul Akbar, PST,
Government Primary School Zangai,
Bara Khyber Agency.
61. Muhammad Raziq S/O Noor Zada,
PST, Government Primary School
Baber Khel Kalley, Bara Khyber Agency.
62. Guli Jan S/O Baghwan Gul, PST,
Government Primary School
Zafar Kalley, Bara Khyber Agency.
63. Shariat Khan S/O Lal Mar Jan, PST,
Government Primary School
Zafar Kalley, Bara Khyber Agency.
64. Abdul Rehman S/O Paya Khan, PST,
Government Primary School
Bine Bara Khyber Agency.
65. Irfan Ullah S/O Chaman Khan, PST,
Government Primary School Zangi,
Bara Khyber Agency.
66. Khaista Noor S/O Waliyat Shah,
PST, Government Primary School
Hayat Mir, Bara Khyber Agency.
67. Gul Hameed S/O Noor Zaden, PST,
Government Primary School
Hukam Shah, Bara Khyber Agency.
68. Saeeda Jehanzeb D/O Jehanzeb, PST,
Government Girls Primary School
Yar Gul Khel Kalley, Bara Khyber Agency.
69. Sajid Ullah S/O Gul Samand, PST,
Government Primary School
Sandana, Bara Khyber Agency.
70. Zenat D/O Abdul Qayum, PST,
Government Girls Primary School
Hayat Shah, Bara Khyber Agency.

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Deputy Registrar
18 NOV 2019

71. Nadia Tabasum D/O Fazal Rahim,
PST, Government Girls Primary School
Sandana, Bara Khyber Agency.
72. Farzana Jabeen D/O Qamar Din, PST,
Government Girls Primary School
Sultan Khel, Bara Khyber Agency.
73. Roeeda Gul D/O Zareen Khan, PST,
Government Girls School Islam Gul,
Bara Khyber Agency.
74. Rubina Shaheen D/O Faqir Muhammad,
PST, Government Girls Primary School
Amir Khan Kalley, Bara Khyber Agency.
75. Shakeela Bano D/O Ghulam Muhammad,
PST, Government Girls Primary School
Kapar Tangi, Bara Khber Agency.
76. Saima Khan D/O Dr. Khan, PST,
Government Girls Primary School
Mkkhar Kot, FR Tank.
77. Basroo D/O Muhammad Zaman, PST,
Government Girls Primary School
Payo Kot, FR Tank.
78. Zainab Bibi D/O Hussain, PST,
Government Girls Primary School
Nawaz Khan Korona, FR Tank.
79. Taj Bibi D/O Qalam Khan, PST,
Government Girls Primary School
Mussam Khan, FR Tank.
80. Amna Bibi D/O Esa Khan, PST,
Government Girls Primary School
Akram Khan, FR Tank.
81. Zaheena Sayed D/O Noor Muhammad Khan,
PST, Government Girls Primary School
Denak, FR Tank.
82. Ambareen Bibi D/O Ghulam Qadir, PST,
Government Girls Primary School
Ghulam Sahee, FR Tank.

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 18 NOV 2019

83. Bilal Khan S/O Mamid Khan, PST,
Government Primary School
Shahbaz Kot, North Waziristan Agency.
84. Abdul Ghafoor Khan S/O Gul Abad Khan,
PST, Government Primary School
Neik Umar Kot, NWA.
85. Afrasiyab Khan S/O Akhtar Ali Khan,
PST, Government Primary School
Surma Jan Kot, NWA.
86. Aziz Ullah S/O Payel Khan, PST,
Government Primary School
Macha Khel, NWA.
87. Nor Zali Khan S/O Ghulam Jalil Khan,
PST, Government Primary School
Dewgar Saidgi, NWA.
88. Abdul Mutalib Khan S/O Sakhj Mar Jan,
PST, Government Primary School
Issor Kot, NWA.
89. Muhammad Ilyas S/O Badiuzaman,
PST, Government Primary School
Nimat Kot, NWA.
90. Muhammad Ghufraan S/O Inayat Ullah Khan,
PST, Government Primary School
Muhammad Amin Kot, NWA.
91. Ubaid Ullah Khan S/O Niaz Bat Khan,
PST, Government Primary School
Khwaja Wani, NWA.
92. Gul Attaullah S/O Umar Khan, PST,
Government Primary School
Muhammad Amin, NWA.
93. Hamid Ullah S/O Amir Muhammad, PST,
Government Primary School
Fazal Rehman, NWA.
94. Muhammad Zaman S/O Hazrat Khan,
PST, Government Primary School
Jalalabad Kot, NWA.

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18 NOV 2019

95. Tehsil Khan S/O Bakhel Jan, PST,
Government Primary School
Payo Jan Kot, NWA.
96. Muhammad Aslam Khan S/O Gul Rehman,
PST, Government Primary School
Wali Mad Khan Kot, NWA.
97. Noor Sala Khan S/O Yaqoob Khan, PST,
Government Primary School
Niamat Kot, NWA.
98. Shah Wazir S/O Yaqoob Khan, PST,
Government Primary School
Mir Ali Camp, NWA.
99. Baz Muhammad Khan S/O
Muhammad Azam Khan,
PST, Government Primary School
Rai Khan Kot, NWA.
100. Abid Ullah Khan S/O Mir Kalam Khan,
PST, Government Primary School
Abdi Khel, NWA.
101. Javid Iqbal S/O Amir Akbar, PST,
Government Primary School
Fateh Khan Kot, NWA.
102. Amal Khan S/O M. Nawaz Khan,
PST, Government Primary School
Rai Khan, NWA.
103. Atta Muhammad S/O Ghulam Muhammad,
PST, Government Middle School
Khair Khel Kalley, NWA.
104. Khan Walli S/O Mir Sali Khan, PST,
Government Primary School
Darpa Khel Kot, NWA.
105. Pawan Din S/O Gul Zaman, PST,
Government Primary School
Zar Jam Khel, NWA.
106. Nazar Gul S/O Ajeeb Gul, PST,
Government Primary School
Hangu Kot, NWA.

FILED TODAY
Deputy Registrar
18 NOV 2019

107. Amir Nawaz Khan S/O Akbar Khan,
PST, Government Primary School
Sakhi Marjan, NWA.
108. Arif Nawaz S/O Akbar Khan, PST,
Government Primary School
Mushki Alam, NWA.
109. Muhammad Ayaz Khan S/O Arsala Khan,
PST, Government Primary School
Noor Khan, NWA.
110. Jahan Baz Khan S/O Rameez Khan,
PST, Government Primary School
Hakeem Kot, NWA.
111. Hidayat Ullah S/O Pakhar, PST,
Government Middle Primary School
Patas Kot, NWA.
112. Aqal Zaman S/O Khushal Khan,
PST, Government Primary School
Abdullah Din, NWA.
113. Mir Shah jehan S/O Khyal Khan,
PST, Government Primary School
Sakhi Mar Jan, NWA.
114. Zahid ud Din S/O Ahmad Kaleem,
PST, Government Primary School
Syed Khan Kot, NWA.
115. Janat Khan S/O Mir Azam Khan,
PST, Government Primary School
Shahadat Kot, NWA.
116. Amir Salah Khan S/O Sharen Khan,
PST, Government Primary School
Usman Khel, NWA.
117. Hazrat Ullah S/O Sahib Khan, PST,
Government Primary School
Garyum, NWA.
118. Muhammad Ihsan S/O Sharen Khan,
PST, Government Primary School
Muhammad Daraz, NWA.

FILED TODAY
Deputy Registrar
18 NOV 2019

119. Nor Hayat Khan S/O Nawab Khan,
PST, Government Primary School
Zaman Khan Kot, NWA.
120. Ata Ullah Jan S/O Maiz Ullah Khan,
PST, Government Primary School
Walli Mad Khan, NWA.
121. Farmanullah S/O Toor Jan, PST,
Government Primary School
Zaman Khan, NWA.
122. Sarfaraz S/O Gul Raheem, PST,
Government Primary School
Noor Khan, NWA.
123. Muhammad Kamal Khan S/O M. Alam,
PST, Government Primary School
Gulab Khel, NWA.
124. Muhammad Asghar S/O Sayed Wali,
PST, Government High School
Ghondi Jamrood Khyber Agency.
125. Ezat Shah S/O Nooram Shah, PST,
Government Primary School
Arak, Kurram Agency.
126. Multan Aurang S/O Gul Samand,
PST, Government Primary School
Chapre, Kurram Agency.
127. Daulat Khan S/O Bahadar Khan,
PST, Government Primary School
Kamal Baza, Kurram Agency.
128. Nor Mar Jan S/O Gul Mar Jan, PST,
Government Primary School
Mir Bagh, Kurram Agency.
129. Shughla Hussain D/O Ghulam Hussain,
PST, Government Girls Primary School
Dogar, Kurram Agency.
130. Muhammad Zubair S/O Dilbar Khan,
PST, Government Primary School
Dagari No. 03, Kurram Agency.

FILED TODAY
Deputy Registrar
18 NOV 2019

131. Gul Haider Jan S/O Ghazi Mar Jan,
PST, Government Primary School
Dagari, Kurram Agency.
132. Noor Khan S/O Zari Gul, PST,
Government Primary School
Mir Bagh, Kurram Agency.
133. Shareef Gul S/O Gul Mar Jan, PST,
Government Primary School
Kalat Mir Bagh, Kurram Agency.
134. Tahir Gul S/O Akhtar Gul, PST,
Government Primary School
Pastwan, Kurram Agency.
135. Wasim Shah S/O Sayed Anwar,
PST, Government Primary School
Super Kot, Kurram Agency.
136. Maqbool Ahmad S/O Muhammad Jan,
PST, Government Primary School
Sher Khan Mir Bagh, Kurram Agency.
137. Gohar Simab W/O Doost Muhammad,
PST, Government Girls Primary School
Shahbaz Samma, Kurram Agency.
138. Riffat Naz W/O Sheeren Badshah, PST,
Government Girls Primary School
Shahbaz Samma, Kurram Agency.
139. Gul Zahra D/O Zameen Akbar, PST,
Government Girls Primary School
Kagawaga, Kurram Agency.
140. Hussan Par D/O Nasir Hussain, PST,
Government Girls Primary School
Dall, Kurram Agency.
141. Nighat Naseem D/O Laiq Hussain, PST,
Government Girls Primary School
Lar Zar, Kurram Agency.
142. Fozia Afzal D/O Muhammad Afzal, PST,
Government Girls Primary School
Luqman Khan, Kurram Agency.

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18 NOV 2019

143. Naveeda Asghar D/O Asghar Jan, PST,
Government Girls Primary School
Adil Colony, Kurram Agency.
144. Shakeel Khatoon D/O Rehmat Hussain,
PST, Government Girls Primary School
No. 01 Para Chinar, Kurram Agency.
145. Nageena D/O Ali Mohgib, PST,
Government Girls Primary School
Amal Kot, Kurram Agency.
146. Bibi Masooma D/O Sayed Agzal, PST,
Government Girls Primary School
Para Chinar, Kurram Agency.
147. Salma Bangesh D/O Rajab Ali, PST,
Government Girls Primary School
Luqman Khel Sehra, Kurram.
148. Shamal Jan Afridi S/O Sayal Khan Afridi,
PST, Government Primary School Dada Nika,
Bara Khyber Agency.
149. Fateh Khan S/O Mula Khel, PST,
Government Primary School Mashkano
Mela, Bara Khyber Agency.
150. Shakir Ullah S/O Shah Bahader,
PST, Government Primary School
Sheen Kamar, Bara Khyber Agency
151. Najida D/O Tahseen Ullah, PST,
Government Girls Primary School
Shekmal Khel, Bara Khyber Agency.
152. Alia Begium D/O Ghulam Jan, PST,
Government Girls Primary School
Musa Khan, Landi Kotal.
153. Najma Begium D/O Hameed Khan,
PST, Government Girls Primary School
Turkistan Kalley, Bara Khyber Agency.
154. Naz Gul D/O Mehar Dil, PST,
GFCS Mulagori, Jamrood
Khyber Agency.

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155. Ghulam Mustafa S/O Sharbat Khan,
PST, Government Primary School
Nasir Kalley, Jamrood Khyber Agency.
156. Nighat D/O Yar Muhammad, PST,
Government Girls Primary School
Khyal Gul Kalley, Landi Kotal.
157. Fatmia Habib D/O Ghulam Habib, PST,
Government Girls Primary School
Kose Wali Khel, Landi Kotal.
158. Khan Malik S/O Amir Jan, PST,
Government Primary School Kotki,
Bara Khyber Agency.
159. Shahid S/O Muhammad Sarwar,
PST, Government Primary School
Jaffar Khan Kalley, Bara Khyber Agency.
160. Noor Jamal S/O Shamal Jan, PST,
Government Primary School Mastk,
Bara Khyber Agency.
161. Waris Khan S/O Naseer Khan, PST,
Government Primary School
Khana Zyarat, Bara Khyber Agency.
162. Naveeda Robi D/O Madad Khan, PST,
Government Girls Primary School
Hayat Khan Kalley, Jamrood Khyber Agency.
163. Shabana D/O Masal Khan, PST,
Government Girls Primary School
Neki Khel, Landi Kotal Khyber Agency.
164. Jamshida Bangesh D/O Laiq Hussain,
PST, Govt. Girls Primary School,
Zeran Kurram Agency.
165. Hukam Khan S/O Said Jamal,
PST, Govt. Primary School,
Hasham Kalley, Khyber Agency.
166. Ghulam Nabi S/O Lalmar Jan,
PST, Govt. Primary School
Midan Gul Kalley, Khyber Agency.

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18 NOV 2019

167. Nazo Bibi D/O Amir Hussain,
PST, Govt. Girls Middle School,
Sur Kamar, Jamrood Khyber Agency.
168. Najeeb Ullah S/O Swal Din,
PST, Govt. Primary School,
Hakim Khan Kalley,
Khyber Agency.
169. Noor Marjan S/O Israr Gul,
PST, Govt. Primary School,
Lal Muhammad Khan,
Bara Khyber Agency.
170. Mah Jabeen D/O Faqeer Gul,
PST, Govt. Girls Primary School,
Anwar Shah Kalley, Bara Khyber Agency.
171. Maryam Ijaz D/O Mir Ijaz Hussain,
PST, Govt. Girls Primary School,
Khandar-Bara Khyber Agency.
172. Bas Bibi D/O Badshah Gul, PST,
Govt. Girls Primary School,
Hanif Jan Kalley Bara Khyber.
173. Khatira D/O Khan Muhammad PST,
Govt. Girls Primary School,
Abdul Kareen Kalley
Jamrood Khyber Agency.
174. Niaz Jan S/O Noor Bad Shah,
PST, Govt. Primary School,
Aslam Kalley Ataree, Jamrood
Khyber Agency.
175. Subhan Ullah S/O Azad Khan,
PST, Govt. Primary School,
Tauda Mela Jamrood Khyber Agency.
176. Farah Naz D/O Zarin Khan, PST,
Govt. Girls Primary School,
Saida Jan Kalley, Khyber Agency.

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18 NOV. 2019

177. Nosheen Saba D/O Muhammad Razaq,
PST, Govt. Girls Primary School,
Khan Zamir Kalley Khyber Agency.
178. Wajiha Saba D/O Muhammad Javed,
PST, Govt. Girls Primary School,
Khana Gul Kalley, Khyber Agency.
179. Noor Jahan D/O Aziz ur Rehman,
PST, Govt. Girls Primary School,
Shahbaz Bsam Kurram Agency.
180. Laiq Bibi D/O Afzal Hussain, PST,
Govt. Girls Primary School,
Navi Kalley Zeran Kurram Agency.
181. Abdul Malik S/O Khan Khel, PST,
Govt. Primary School,
Mewa Khan Kalley, Khyber Agency.
182. Saira Bano D/O Taj Muhammad,
PST, Govt. Girls Primary School,
Surqamar No. 02, Khyber Agency.
183. Hazrat Hussain S/O Nadir Ali,
PST, Govt. Primary School,
Lal Mat Kally, Jamrood Khyber Agency.

All C/O Petitioner No. 1 Petitioners

Verses

1. Director, Elementary & Secondary
Education Department, KP Peshawar.
2. District Education Officer,
E & SE, District Khyber at Jamrud.
3. District Education Officer,
E & SE, District Waziristan
at Miranshah.
4. District Education Officer,
E & SE, District Tank at D.I. Khan.
5. District Education Officer,
E & SE, District Kurram
at Parachinar. Respondents

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18 NOV 2019

⇔<=>⇔<=>⇔<=>⇔<=>⇔

**REVIEW PETITION U/S 114 OF CIVIL PROCEDURE
CODE 1908, AGAINST ORDER/JUDGMENT DATED 30-
10-2019, WHEREBY WRIT PETITION OF
PETITIONERS WAS DISMISSED FOR NO LEGAL
REASON.**

⇔<=>⇔<=>⇔<=>⇔<=>⇔

Respectfully Sheweth:

1. That on 17-09-2018, petitioners filed W.P. No. 4597-P / 2018 before this hon'ble court for:-
 - a. Declaration of Notification dated 29-08-2018, regretting representation of petitioners by R. No. 01 to be illegal, improper, unjust, etc. By not counting the previous service rendered in the schools towards pensionery benefits.
 - b. Direct the authority to regularize the initial service of the petitioners rendered in the Community Schools towards regular service for pensionery and other benefits. (Copy as Annex "A")
2. That the said Writ Petition came up for hearing on 30-10-2019 before the hon'ble Bench comprising of Justice Lal Jan Khan and Justice Muhammad Ibrahim Khan and then the same was dismissed for no cogent reasons. (Copy as Annex "B")
3. That order/judgment dated 30-10-2019 is liable to review, inter alia, on the following grounds:

GROUND S

- a. That as is evident from the prayer, the whole of the judgment is based on other footings and never look to consider the prayer of the petitioners by the hon'ble Bench.
- b. That judgment of the hon'ble Bench is holey and soley is based / passed on factual controversy as to whether the Community Schools were functional or not functional in FATA, petitioners petition is not based on the aforesaid count but requested for counting of 10 years previous service rendered by the petitioners in the schools towards pensionery benefits.

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Deputy Registrar
18 NOV 2019

- c. That the verdicts of the apex court etc. cited in the judgment by the hon'ble Bench therein has no relevancy with the request of petitioners made in the Writ Petition.
- d. That 10 years spotless service rendered by the petitioners cannot be put into a waste box but the same is legally required to be counted towards pensionary benefits.
- e. That the impugned judgment is not based on legal footing but is otherwise.

The services of petitioners were held on 31-12-2010. Thereafter, their services were restored at the respective positions on 28-10-2011, with effect from 01-10-2011, and were then regularized on 11-05-2012. Only nine months (09) break was occurred but in this period too, they were undergoing Training / Workshop for PTC teachers in various subjects. (Copies as annex "C" & "D")

It is, therefore, most humbly requested that the impugned judgment dated 30-10-2019 rendered by the hon'ble Bench be kindly reviewed / set aside and then the Writ Petition be allowed as prayed for.

Petitioners

Through



Saadullah Khan Marwat



Arbab Saif-ul-Kamal



Amjad Nawaz
Advocates

Dated 16-11-2019

CERTIFICATE

Certified that in view of the facts and grounds mentioned in the above noted petition this is a fit case of review.

No similar Review Petition has been filed on behalf of petitioner earlier.

FILED TODAY
Deputy Registrar
18 NOV 2019


Advocate

IN THE PESHAWAR HIGH COURT, PESHAWAR

Review Pett: No. 231P /2019

IN

W.P No. 4597-P /2018

Anzar Gul & Others

versus

Director & Others

AFFIDAVIT

I, Anzar Gul S/O Zar Din, PST, Government Primary School Saeed Ullah Jan Kalley, Bara, ^{District} Khyber Agency (Petitioner No. 01), do hereby solemnly affirm and declare that the contents of the **Review Petition** are true and correct to the best of my knowledge and belief.

Identified By:

Saadullah Khan

Saadullah Khan
Advocate,

Anzar Gul

DEPONENT

CNIC #: 21201-2701312-5

Cell No. 0308-5331712

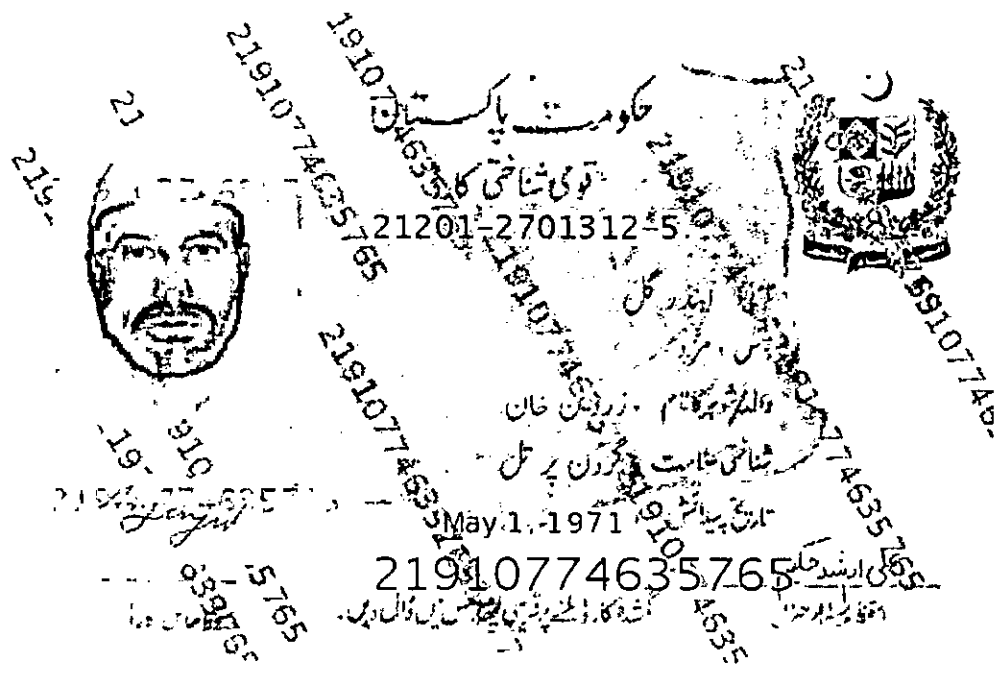
No. 13760

Certified that the affidavit is based on solemnly affirmation before me in office this 16 day of Nov 19 by Anzar Gul s/o Zar Din who was accompanied by Saadullah Khan who is personally well known to me.

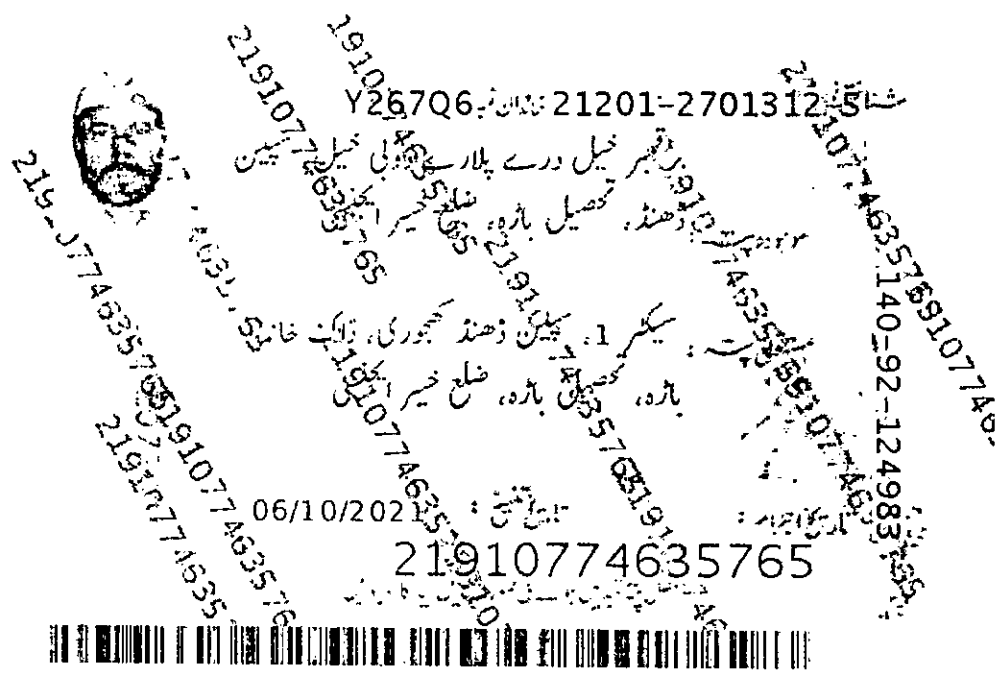
Saadullah Khan
16/11/19
Oath Commissioner
Peshawar High Court Peshawar

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Deputy Registrar
18 NOV 2019

Anzar Gul Verified



حکومت پاکستان
قومی شناختی کارڈ
21201-2701312-5
Zafar Khan
May 1, 1971
21910774635765



قومی شناختی کارڈ
Y267Q6
21201-2701312-5
06/10/2021
21910774635765

Census 1998 Database [x]

There is no record for this individual in the census database. Either no census data was registered, or lacks necessary identity information that could be used for linking the record with this individual.

Other Information that does not appear on card [x]

Place of Birth خیر ایجنسی

Religion Islam

Mother's Name بیاز گل

Digital Signature [x]

IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P No. 459



1. Anzar Gul S/O Zar Din, PST,
Government Primary School,
Saeed Ullah Jan Kalley,
Bara Khyber Agency.
2. Sadiq Ahmad S/O Sher Jan, PST,
Government Primary School
Toor Dara Jamrood Khyber Agency.
3. Khial Gul S/O Zahir Shah, PST,
Government Primary School Toor Dara,
Jamrood Khyber Agency.
4. Mohibullah S/O Ihsan Ullah, PST,
Government Primary School Toora
Tara Jamrood Khyber Agency.
5. Irat Khan S/O Ilyas Khan, PST,
Government Primary School Jani Khel,
Jamrood Khyber Agency
6. Muhammad Jan S/O Allah Baz, PST,
Government Primary School Nazar
Kalley, Landi Kotal Khyber Agency
7. Arman Gul S/O Lal Mat Khan, PST,
Government Primary School
Rekaley Jamrood Khyber Agency.
8. Ameen Shah S/O Mustan Shah, PST,
Government Primary School
Choor No. 03, Jamrood Khyber Agency.
9. Rehman Gul S/O Ghirat Gul, PST,
Government Primary School Attari,
Jamrood Khyber Agency.
10. Sabit Khan S/O Gul Mar Jan, PST,
Government High School Choor,
Jamrood Khyber Agency.

ATTESTED**EXAMINER
Peshawar High Court**

Regarding the aforesaid aspects of the schools after receiving reports to the authorities about the destruction of the schools reports were made about the non-functional of the schools in FATA and it was decided to close the same because the teachers were getting their salaries without performing duties in the schools. The authorities terminated their services of teachers and other staff.

That after the said action, teachers the local elders and its union made efforts to save the services of the teachers and other staff vice letter dated 12-11-2010, as by then, the wave of miscreants to some extent was released. (Copy as annex "B")

The Standing Committee of SAFARIAN held meeting on 21-12-2011 at Parliament House Islamabad to regularize services of petitioners and it was recommended that FATA Secretariat should regularize the services of Community School Teachers including their previous services and graded pay as per previous practice without further delay. Summary will be submitted for approval of Governor KP.

For regularization in recruitment rules and regularization of the Community School Teachers from the date of initial recruitment against the posts vide letter dated 16-01-2012, followed by subsequent letter dated 26-04-2012. (Copies as annex "C")

That on 30-04-2012, Summary for the purpose was submitted before the Governor KP and approved the same to regularize services of the Community School Teachers and other staff. (Copy as annex "D")

That on 11-02-2012, Secretary, Social Sector, Government FATA Secretariat, Peshawar issued notification, stating therein that the Government has approved the appointment of the Community School Teachers against regular posts of PST B-07 in respective Agencies and their posts with some terms and conditions. (Copy as annex "E")

That on 29-10-2012, Secretary, Social Sector, FATA issued subsequent notification regarding adjustment of Community School Teachers against regular posts of PST was allowed on merit basis in accordance with policy. (Copy as annex "F")

ATTESTED
Peshawar High Court
EXAMINER

9. That after taking into account all aspects of the case, the authority was pleased to regularize services of petitioners vide order dated 02-11-2015, 07-01-2016, 08-01-2016, 20-07-2016, 20-07-2016, etc. (Copies as annex "G")
10. That petitioners rendered services in the schools on contract basis for more than 10 years but no benefit of the same was extended to them to count the same for pensionary benefits, so submitted representation before Director Education - FATA, Secretariat, Peshawar on 22-03-2017, but the same was regretted for no legal reason vide notification dated 29-08-2018. (Copies as annex "H" & "I")

Hence this Writ Petition, inter alia, on the following grounds:

GROUNDS

- a. That admittedly petitioners served the department after initially appointing them in the schools from the date of their appointment in the schools and served the department devotedly.
- b. That the schools were closed due to law and order situation by the authorities while on the other hand, petitioners never refused to perform duty and such aspect of the case shall not be attributed to them.
- c. That as and when services of petitioners were regularized, the same should have been from the date of initial appoint and not with immediate effect as at the same time, petitioners performed their duty like other regular employees of the department.
- d. That fresh vacancies were created at the time of appointment of petitioners in the schools. There was no difference in the duties of the contract employees as well as of the regular employees, thus petitioners was not treated at par and discriminated.
- e. That petitioners seeks relief of the rendered services to be counted towards pensionary benefits and non the else.
- f. That petitioners files the petition in hand before this hon'ble court to adjudicate upon as no term and condition of the existing service is violated, so the hon'ble court has the exclusive jurisdiction in the matter.

ATTESTED
EXAMINER
 Peshawar High Court

- g. That services of some of the employees of the Community schools have been regularized / counted towards the present service, petitioners also deserves the said treatment.
- h. That by not treating petitioners at par with other colleagues / regular employees of the department by the authority is not only discrimination but such act is based on malafide.

It is, therefore, most humbly prayed that on acceptance of the Writ Petition, in exercise of the extraordinary constitutional jurisdiction, this hon'ble Court may graciously be pleased to:

- a. Declare notification dated 29-08-2018 of the R. No. 01 to be illegal, improper, unjust, discriminatory, malafide, without lawful authority and of no legal effect.
- b. Direct the authority to regularize the initial service of the petitioners rendered in the Community Schools to the regular service for pensionary and other benefits;

AND / OR

- c. Any other writ/order/direction deemed proper and just in the circumstances of the case be also issued/ordered/given.

ATTESTED

EXAMINER
Peshawar High Court

Dated: 17-09-2018

LIST OF BOOKS:

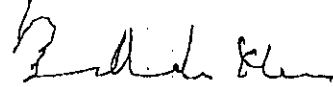
1. Constitution
2. W.P. No. 2307/13

CERTIFICATE:

As per instructions of my client, certified that no such like Writ Petition was earlier filed by the petitioner, before this Honorable Court.
 (it's a DB case)

Petitioners

Through


 Saadullah Khan Marwat

Amjad Khan

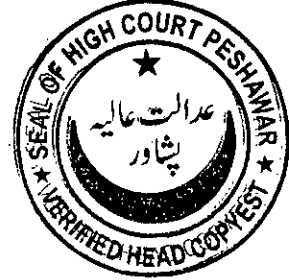
Advocates,

B 26

JUDGMENT SHEET

PESHAWAR HIGH COURT, PESHAWAR
(Judicial Department)

W.P No. 4597-P/2018 alongwith
CM No. 2293-P/2019



JUDGMENT

Date of hearing: **30.10.2019**

Petitioner: (Anzar Gul & others) by
Mr. Saadullah Marwat, Advocate.

Respondents (Director Education FATA &
others) by: Mr. Rab Nawaz Khan, AAG.

MOHAMMAD IBRAHIM KHAN, J.- The

Department of Education FATA, in order to raise literacy level, launched a project of Community Schools under FATA Annual Development Program in the year 1998 till 20.10.2010 wherein, 956 schools were opened and total 1912 (02 per school) were appointed as PST since 2003 including the petitioners after fulfilment of all codal formalities. Due to law and order situation in FATA, many schools were destroyed and being non-

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ATTESTED

EXAMINER
Peshawar High Court

functional schools, it was decided to close the same as the teachers were getting salaries without performing their duties. In meeting of Standing Committee of SAFRAN held on 21.12.2011, it was decided that the FATA Secretariat should regularize the services of Community School teachers from their initial recruitment vide letters dated 16.01.2012 and 26.04.2012. After approval of Summary by the Government of Khyber Pakhtunkhwa, the Community School teachers were adjusted against regular posts of PST BPS-07 and in this respect, the Secretary Social Sectors Department FATA issued notification on 11.05.2012 and they were subsequently regularized however, the services rendered by the petitioners on contract basis for more than 10 years were not extended to them for pensionary benefits, against which the

ATTESTED

EXAMINER
Peshawar High Court

petitioners filed representation but the same was regretted on 29.08.2018, hence, this writ petition preferred by them under Article 199 of the Constitution of the Islamic Republic of Pakistan with the following perspective prayers:-

"It is, therefore, most humbly prayed that on acceptance of this Writ Petition, in exercise of the extraordinary constitutional jurisdiction, this Hon'ble Court may graciously be pleased to:

- a. *Declare notification dated 29.8.2018 of the R No. 01 to be illegal, improper, unjust, discriminatory, malafide, without lawful authority and of no legal effect.*
- b. *Direct the authority to regularize the initial service of the petitioners rendered in the Community Schools to the regular service for pensionary and other benefits.*
- c. *Any other writ/order/ direction deemed proper and just in the circumstances of the case be also issued/ordered/ given."*

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2. Having heard arguments of learned counsel for the petitioners and learned AAG on behalf of the official respondents,

ATTESTED

EXAMINER
Peshawar High Court

record with their valuable assistance gone through.

3. The respondents were on high alert to submit their comments accordingly, the respondents No. 1, 2 and 5 jointly submitted their para-wise comments. True, that the petitioners were initially appointed in the project of Community Schools under the FATA Annual Development Program in the year 1998 wherein, 1912 teachers (02 per school) were appointed including the petitioners on PST Posts in the year 2003 but due to the law and order situation in FATA, some schools were non-functional but even then the petitioners were regularized after fulfilling all the codal formalities by the respondents. Now there arises factual controversy that the community schools were functional or non-functional in FATA, thus, it

ATTESTED

EXAMINER
Peshawar High Court

leads to factual controversy to utter declare that the schools were functional or non-functional. The writ petition in view of factual controversy is not at all maintainable. The constitutional jurisdiction of this court would seriously be barred as such like controversy can be agitated before the Civil Court. In support of the matter being of factual controversy wisdom is derived from 2005 PLD 347 Supreme Court titled *Mst. Irshad Begum and 2 others vs Muhammad Arshad*, 2005 PLC 366 Supreme Court titled *Pervez Alam vs Pakistan Dairy Products (Pvt) Ltd, Karachi*, 2005 SCMR 1650 Supreme Court titled *Muhammad Ayub vs Ghulam Muhammad*, 2005 SCMR 1542 Supreme Court titled *Muhammad Ramzan vs Additional District Judge, Multan*, 2004 PLC 2013 Supreme Court titled *Riaz*

ATTESTED

 EXAMINER
 Peshawar High Court

Ahmed Malik vs Administrator, Municipal Corporation Bahawalpur, 2004 SCMR 1602

Supreme Court titled *Muhammad Safdar Abbasi vs Amir Yar Malik, 2004 SCMR*

1521 Supreme Court titled *Mst. Hanifa Bibi vs Munawar Ahmad, 2004 SCMR 979*

Supreme Court titled *Mirza Abdul Rehman vs Deputy Commissioner/ Returning Officer,*

Attock and 2003 SCMR 225 Supreme Court


titled *Commanding Officer, Frontier Works*

Organization, Karachi vs Haji Abdul

Waheed.

4. In view of the above, this petition has no force, which is hereby dismissed.

Announced.
Dt: 30.10.2019


JUDGE

JUDGE

Muhammad Fiaz (D.B.) Hon'ble Mr. Justice Lal Jan Khattak
Hon'ble Mr. Justice Mohammad Ibrahim Khan, J


CERTIFIED TO BE TRUE COPY

Summit
Bahawalpur City, District, Bahawalpur
Authorised Signatory Order No. 31
In Accordance with Order 1984

08 NOV 2019

No. 12196
Date of Presentation of Application 5/11/13
No of Pages 13
Copying fee 52
Total
Date of Preparation of Copy 8/11/13
Date of Delivery of copy 8/11/13
Received By [Signature]

AGENCY EDUCATION OFFICE KHYBER AGENCY AT JAMRUD

RE-APPOINTMENT ORDER

Consequent upon the approval of competent authority letter No. 6487-99 dated 6/10/2011 and recommendations of Scrutiny Verification Committee of Khyber Agency, the following candidates are hereby re-appointed against the project posts of PTC having SSC @ Rs. 11000/-PM fixed and having FA/R.Sc. 2nd Division @ Rs. 13500/-PM fixed for the project period at Boys Community Schools of Tehsil Bara Khyber Agency against vacant posts with effect from 1/10/2011 in the schools noted against each their names:-

S.No	Name	Father's Name	Name of School
1	Muhammad Karim	Khan Karim	BGS Batoor Killi Bara
2	Shah Jehan	Gul Zamir	.do.
3	Samal Jan	Sial Khan	BGS Shakir Ullah
4	Haji Muhammad	Allah Baz	.do.
5	Siraj Akber	Mugeem Khan	BGS Habib Ullah Shin Kamar
6	Abdul Gadeem	Rehmat Khan	.do.
7	Muhammad Alam	Abdullah Mir Khan	BGS Haji Amir Khan BOK Tirah
8	Muhammad Amin	Abdullah Mir	.do.
9	Said Ahmed	Lal Madar	BGS Saleem Khan Takhtakai
10	Gull Jan	Haji Baghwan Gul	BGS Zale Khan MDK Tirah
11	Wahid Khan	Zardad Khan	.do.
12	Sohail Ahmed	Zar Baz Khan	BGS Duran Gul MDK Tirah
13	Muhammad Sadig	Zarbaz Khan	.do.
14	Abdul Bagi	Hassan Khan	BGS Noorin Shah BOK Tirah
15	Hukam Khan	Said Jamal	.do.
16	Shahid Khan	Mugam Din	BGS Kaleem Mastak Ziuddin
17	Suleman Shah	Gul Bad Shah	.do.
18	Rab Nawaz	Muhammad Khan	BGS Pakistan Tora Wela Ziuddin
19	Iqbal Hussain	Sher Muhammad	.do.
20	Yar Muhammad	Mirza Gul	BGS Barakat Shah Mastak Tirah
21	Said Mar Jan	Saida Jan	.do.
22	Mazuliah	Dilawar Khan	BGS Adam Khan Mastak Ziuddin
23	Waris Khan	Nasir Khan	.do.
24	Abdur Rehman	Payo Khan	BGS Bangi Jan Mastak
25	Shahid	Muhammad Sarwar	.do.
26	Abdur Rouf	Muhammad Yousaf	BGS Maroof Khan Bango Kass
27	Hamidullah	Afsar Khan	.do.
28	Fazle Akber	Khalid Noor	BGS Haji Muhammad BOK Tirah
29	Muhammad Ishaq	Miraj Gul	.do.
30	Shoukat Khan	Muhammad Younis	BGS Zar Muhammad Sandapat Tirah
31	Mir Akbar	Gul Akbar	BGS Mughal Jan Tora Wela Ziuddin Tirah
32	Irat Khan	Ilyas Khan	BGS Kuki Khel Mangal Tirah
33	Irfanullah	Chaman Khan	.do.
34	Abdul Rayum	Rehmat Gul	BGS Rehmat Khan Shahi Baig Tirah
35	Gul Amin	Angor Khan	.do.
36	Sajidullah	Gul Samand	BGS Kinaya MDK Nakai Tirah
37	Muhammad Khan	Shaus Khan	.do.
38	Hojar Khan	Samand Khan	BGS Raj Malook Bango Kass Ziud Din Tirah
39	Yar Muhammad	Khana Jan	.do.
40	Rayees Khan	Nurooz Khan	BGS Awal Karim BOK Tirah
41	Mushraqullah	Said Lal	.do.
42	Sifatullah Khan	Gul Nawaz	BGS Zarmast BOK Tirah
43	Muhammad Farooq	Sayad Muhammad	BGS Habib Shah Sari Kandow Tirah
44	Abdul Hanan	Jaman Khan	.do.

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45	Muhammad Jehangir Khan	Khawaja Muhammad	BCS Arqub Shah Spin Drand Tirah
46	Fateh Khan	Mula Khel	.do.
47	Hilmand	Faqir Hussain	BCS Said Ahmad Shah MDK Nakai Tirah
48	Wajahat	Majeed Khan	.do.
49	Qimat Khan	H.Ajar Khan	BCS Meena Gul Aka Khel Tirah
50	Maroot Khan	Arbab Khan	.do.
51	Raj Muhammad	Zahir Shah	BCS Yar Hamza Aka Khel Tirah
52	Gul Zaman	Stori Khel	.do.
53	Miraj Gul	Zain Gul	BCS Gul Asghar Bai Ghari Stori Khel Tirah
54	Abid Khan	Zain Gul	.do.
55	Muhammad Akbar	Awal Zadeen	BCS Ilyas Aka Khel Tirah
56	Bakht Marjan	Qandhar Khan	.do.
57	Rafceullah	Abdul Majeed Khan	BCS Mian Ahmad Gul MDK Nakai Tirah
58	Majeed Khan	Dawlat Shah	.do.
59	Khalid Khan	Nazar Shah	BCS Muhammad Din Shah SQK Tirah
60	Jamshid Khan	Nawab Khan	.do.
61	Shariat Khan	Lalmar Jan	BCS Zahir Shah Shadalay Aka Khel Tirah
62	Noor Jamal	Shamal Jan	.do.
63	Khial Bat Khan	Daulat Khan	BCS Salim Khan Tamboo BQK Tirah
64	Inzar Gul	Zar Din Khan	.do.
65	Noor Mar Jan	Issar Gul	BCS Khushal Khan BQK Tirah
66	Tariq Usman	Arsala Khan	.do.
67	Wazir Khan	Saadullah Khan	BCS Sharif Khan Spin Drand Tirah
68	Muhammad Afzal	Ayub Khan	.do.
69	Niaz Ali	Alam Khan	BCS Malik Murad Stori Khel Tirah
70	Muhammad Ayaz	Shahzad Mir	.do.
71	Hirat Shah	Sharif Khan	BCS Said Raman Khapoor Tirah
72	Said Ghani	Anar Gul	BCS Wachan Gul Qamar Khel Tirah
73	Sameen Gul	Zar Khel	.do.
74	Mumtaz Khan	Khaista Jan	BCS Jumat Gul Stori Khel Tirah
75	Shakirullah	Shah Bahadar	BCS Mawaz Ghaibi Nika Sepah Tirah
76	Muhammad Raziq	Noor Zada	.do.
77	Khan Malik	Sahib Gul	BCS Amir Jan Kola Aka Tirah
78	Ghulam Nabi	Lal Mar Jan	.do.
79	Khaista Noor	Walayat Shah	BCS Zira Jan Aka Khel Tirah
80	Fazle Ghani		.do.
81	Said Noor	Gul Muhammad	BCS Haji Masood BQK Tirah
82	Hazrat Wali	Mian Jan	.do.
83	Gul Faraz	Mian Khel	BCS Khair Jan Aka Khel Tirah
84	Muhammad Farooq	Doulat Khan	.do.
85	Abdul Majeed	Lal Mar Jan	BCS Khial Mar Jan Aka Khel Tirah
86	Farhad Khan	Saida Khan	.do.
87	Sajid Ahmad	Payo Khel	BCS Saleem Khan SQK Tirah
88	Abdul Qayum	Sardar Ali	.do.
89	Sami Ullah Khan Afridi	Gula Baz Khan Afridi	BCS Jamal Khan BQK Tirah
90	Said Rehman	Ulag Khan	BCS Nooran Shah Sairai Kandow Tirah

Note:

1. The employee shall serve the Govt. as communal schools teachers from the date of assumption of charge.
2. They shall devote their whole time to their duties as communal school teachers.
3. They shall submit themselves to the lawful orders of the Govt. officers.

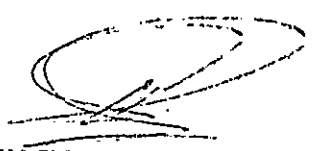
4. They shall motivate the parents to send their children to schools.
5. These posting will not be transferable.
6. If they fail to report within 15 days, the order will automatically be treated as cancelled.
7. Charge reports should be submitted to all concerned.
8. Their services are only for the project period.
9. In case of regularization of communal schools they will not claim regular service. They will be treated as terminated from service as and when the concerned communal schools are regularized.
10. The A.A.E.O (Male) of concerned Tehsil/Circle will verify their presence through original CNIC.
11. Each and every teacher will submit an affidavit that she will perform duty personally not through substitute.

(HASHAM KHAN AFRIDI)
 AGENCY EDUCATION OFFICER
 KHYBER AGENCY AT JAMRUD

Endst: No. 10242-48 / Apptt: Comm: / Khyber Dated Jamrud the 28 / 10 / 2011

Copy of the above is forwarded to the: -

1. Director Education (FATA) at Peshawar
2. Political Agent Khyber Agency at Peshawar
3. Agency Accounts Officer Khyber Agency at Jamrud
4. AAEO (Male) local office. (They will be held responsible if any discrepancy/negligence found later on).
5. Superintendent local office
6. Accountant/Pay clerk concerned.
7. Official concerned.


 AGENCY EDUCATION OFFICER
 KHYBER AGENCY AT JAMRUD

DDF (Pam)

35

AGENCY EDUCATION OFFICE
KHYBER AGENCY AT JAMRUD
NO 8708
DATED 25/11 /2010

To

The Director Education
FATA at Peshawar

Subject:

**CLOSURE OF NON FUNCTIONAL COMMUNAL SCHOOLS IN
FATA**

INTERIM REPLY

Memo

With reference to your Endst: No 8109-27 Dated 15.04.2010 on the above referred subject.

It is stated that the flowing five schools which are non functional and redundant have already been dropped from the list and intimated.

1. BCS Lal Jan Killi BZK Landi Kotal
2. GCS Khan Zad Gul Killi Tourkham Landi Kotal
3. BCS Rahim Shah Killi Tirah Jamrud
4. BCS Zaman Killi Tirah Jamrud
5. BCS Guli Shah Killi Tirah Jamrud

Move over the following two schools are non functional owing to the non availability of local trained female staff have been deleted temporarily but will be made functional subject to the availability of local staff.

1. GCS Islam Gul Durbi Khel Tirah Bara
2. GCS Khan Mat Khan killi Sukh Tirah Bara

The above points have already been incorporated in the rectified PC-I. Further more a committee has been constituted comprising upon three AAEO,s 1. Mr, Shah Jehan AAEO 2. Mr, Hidayat Ullah AAEO 3. Mr, Muhammad Nawaz AAEO who will thoroughly probe the matter and the findings will be intimated.

AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD



36
attention
AEO NWA

FATA SECRETARIAT
DIRECTORATE OF EDUCATION
SHIBER ZAHIDUNNADWA, WARSAH ROAD PESHAWAR, PAKISTAN
PHONE: 011 3210199 FAX: 011 3210214
No. 5187-96
Date Pesh: 18/7/2011

To:

All the Agency Education Officers in FATA

Subject:

DEPLOYMENT OF COMMUNITY SCHOOL TEACHERS

Memo:

I am directed to refer to the above noted subject and to convey the directive of FATA Secretariat that if there are community school teachers who belong to inaccessible areas, where schools were closed due to Law & Order situation, they should be considered for performing duties in community schools in accessible areas while reporting about the functional community schools by the respective Committee in your Agency/FR.

Add: Director (P&M)

Endst: No. _____ /

Copy to the:-

1. All Political Agents in FATA
2. District Coordination Officers Peshawar, Kohat, Banuu, Lakki, Tank & DI Khan ✓
3. PS to Additional Chief Secretary FATA
4. PS to Secretary A&C
5. P.A to Director Education FATA.

Add: Director (P&M)



37

FATA SECRETARIAT
Social Sectors Department
Warsak Road Peshawar

Notification

No. SO(E)/SSD/CSTR/99-108/ The Governor Khyber Pakhtunkhwa in his capacity as the Competent Authority has been pleased to approve the re-appointment of Community School Teachers who qualify to be posted against the regular posts of PST (BS-7) in phased manner at the respective Agencies & FRs, purely on merit basis in accordance with the existing recruitment criteria but in relaxation of upper age limit with immediate effect as specified below.

1. The available regular vacant PST (BS-7) posts in the Primary/Middle Schools in FATA will be filled up from amongst the Community School Teachers and no fresh candidate considered for recruitment till all the eligible Community School Teachers are absorbed against regular posts in their respective Agencies/FRs.
2. The non-local eligible Community School Teachers shall be considered for re-appointment against the regular vacant posts of PST (BS-7) after adjustment of local qualified teachers.
3. The services of the un-qualified teachers shall be dispensed with.
4. The Community Schools whose teachers are appointed and shifted to other schools against regular posts, would be closed down.
5. The respective Community Schools students would be shifted to nearby regular schools and no further recruitment of Community School teachers will be made.

Secretary
Social Sectors Department,
FATA Secretariat, Peshawar

Endst No. Even Dated Peshawar the 11/05/2012

Copy forwarded to the:-

1. Secretary to Governor, Khyber Pakhtunkhwa Peshawar.
2. Addl: Accountant General (PR) Sub Office Peshawar.
3. Director Education FATA, Peshawar.
4. All Political Agents in FATA.
5. DCO Peshawar, Kohat, Bannu, Lakki, D.I.Khan & Tank.
6. Agency/ District Accounts Officers concerned
7. All the Agency Education Officer in FATA
8. PS to Additional Chief Secretary FATA Peshawar.
9. PS to Secretary Social Sectors Department, FATA Secretariat, Peshawar.
10. PS to Secretary P&D, FATA Secretariat, Peshawar.

Signature

Signature
Section Officer (Edu) SSD
FATA Secretariat, Peshawar

Directorate of Education FATA



Workshop for PTC Teachers of FATA in the Subject Maths & General Science
under (PC DSP Project)

IT IS TO CERTIFY THAT

Mr. Anzar Gul Designation PST/PTC

Institution GPS Tarkho Kas Successfully completed the training
Course of Primary Schools Teachers held at Govt. College of Education for Elementary Teacher (Male) Junrud Khyber
Agency w.e.f. 03-02-2011 to 14-02-2011

FATA

Course Coordinator (M)

Director Education FATA
FATA Secretariat
Director Education
FATA Secretariat, Peshawar

38

2

Directorate of Education FATA



Workshop for PTC Teachers of FATA in the Subject Maths & General Science
under (PC DSP Project)

IT IS TO CERTIFY THAT

Mr. Anzar Gul

Designation

PST/PTC

Institution GPS Tarkho Kas

Successfully completed the training

Course of Primary Schools Teachers held at Govt. College of Education for Elementary Teacher (Male) Jamrud Khyber

Agency w.e.f 03-02-2011 to 14-02-2011



Course Coordinator (M)

Director Education FATA

FATA Secretariat

Director Education

FATA Secretariat, Peshawar

39

Handwritten mark on the right edge of the certificate.



The Bank of Khyber

Please use separate slips for Local Clearing & Collection Cheques

DEPOSIT SLIP
CUSTOMER'S COPY

2588216

Branch: _____ Branch Code (In Case of online transactions): Select One: Cash Instrument Date: 12/11/2019

Title of Account Registrar PHC Account Type: Current Saving

Purpose of Deposit (In Case of Online Transaction): Review Fee Account No: 2800-009

Currency: PKR USD EURO GBP JPY Others (Please specify): _____

Bank's Name	Branch Name	Instrument No.	Denomination	Quantity	Amount
SRP	Pakistan	Cash	100	10	1000/-

TOTAL AMOUNT 10000/-

Amount in Words: Ten Thousand only

Depositor's CNIC No. (In Case of Online Deposit):

Name:

Contact No.

THE BANK OF KHYBER
High Count Branch, Pakistan
18 NOV 2019
Received Cash
(Not official unless validated)

Received by J

Amzer Gul - V -
Reviewed in NRP 4597/2018

بہالتِ جناب پشاور ہائی کورٹ پشاور

اندر گل وغیرہ نام دوسرے دوسرے

دعویٰ میں نین / گنگہ
Review Petition

باعث تحریر یہ ایک

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ آن مقام پشاور کے لئے سعد اللہ خان مروت ایڈووکیٹ ہائی کورٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کابل اختیار ہوگا نیز وکیل صاحب کو کرنے راضی نامہ و تقرر ثنالت و فیصلہ بحلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور رضی دعویٰ اور درخواست ہر قسم کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری کیٹرفن یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پروا ختم منظور قبول ہوگا و دوران مقدمہ میں جو خرچہ و ہرجانہ التواء مقدمہ کے سبب سے ہوگا اس کے مستحق وکیل صاحب موصوف ہوں گے نیز لیا یا و خرچہ کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکور کریں۔
لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم: ۱۹ - ۱۱ - ۱۶

FILED TODAY
Deputy Registrar
18 NOV 2019

العبد العبد العبد

سعد اللہ خان مروت

ایڈووکیٹ

مس روینہ تاج

ایڈووکیٹ

(۱) اندر گل / گنگہ

Guar

Khu

AD

(۲) صادق احمد

(۳) ضیال گل

(۴) محبت اللہ

(24) استخار خان ~~Hand~~

(25) فارید اللہ ~~Hand~~

(26) سبزر سبزر

(27) جنت خان ~~Hand~~

(28) محمد صبر ~~Hand~~

(29) اسرار ~~Hand~~

(30) نواب خان ~~Hand~~

(31) محمد سعید خان ~~Hand~~

(32) عسر ~~Hand~~

(33) بزرگ ~~Hand~~

(34) انور خان ~~Hand~~

(35) منور خان ~~Hand~~

(36) میر سید ~~Hand~~

(37) وزیر خان ~~Hand~~

(38) ضیاء خان ~~Hand~~

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(40) یار خان ~~Hand~~

(41) محمد خان ~~Hand~~

(42) سراج خان ~~Hand~~

(43) عبدالکرم ~~Hand~~

(44) محمد خان ~~Hand~~

(45) سعید خان ~~Hand~~

(5) میرات خان ~~Hand~~

(6) محمد جان ~~Hand~~

(7) آرمان خان ~~Hand~~

(8) امین شاہ ~~Hand~~

(9) رحمان خان ~~Hand~~

(10) شایب خان ~~Hand~~

(11) شاہ ولی ~~Hand~~

ساجد احمد ساجد احمد

راستخان ~~Hand~~

عبداللہ ~~Hand~~

Tasir ~~Hand~~

shah ~~Hand~~

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یعدالت جناب پشاور عالی کورٹ پشاور

اندر گل ونیزہ بنام ڈاٹر سٹریٹس ونیزہ

دعویٰ

باعث تحریر ایسکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ آن مقام پشاور کے لئے سعد اللہ خان مروت ایڈووکیٹ ہائی کورٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کابل اختیار ہوگا نیز وکیل صاحب کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف لینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق اور اس پر دستخط کرانے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پروا ختم منظور قبول ہوگا و دوران مقدمہ میں جو خرچہ و ہرجانہ التواء مقدمہ کے سبب سے ہوگا اس کے مستحق وکیل صاحب موصوف ہوں گے نیز بقایا و خرچہ کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکور کریں۔

لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم

FILED TODAY

Deputy Registrar

18 NOV 2019

العبد العبد العبد

11-
ارباب سیف اکمال
ایڈووکیٹ

سعد اللہ خان مروت
ایڈووکیٹ

مس روینہ تاق
ایڈووکیٹ

ڈپٹی رجسٹرار

46 سربراہ اکبر

47 کرناضی

48 سید

محمد حیدر

Saeed

Sajid

Zaid

Nadeem

Fahim

Rahim

Ahmed

محمد حیدر 67

سعدہ خانزاد 68

ساجد اللہ 69

زینت 70

نادیم تبسم 71

فرزانہ حبیب 72

رویدہ گل 73

روبینہ شامین 74

Khalid

Jamshed

Sami

Sham

Shahid

Abulhasan

Abulhasan

Abulhasan

Raja

Bashir

رئیس خان

Muhammad

Muhammad

Qasim

Shahid

Abulhasan

یقانہ

Khalid

محمد حیدر اللہ (19)

رضا اقبال حسن (20)

شامد خان (21)

سلمان شاہ (22)

شامد خان (23)

عبد القیوم (24)

محمد امین (25)

محمد زمان (26)

محمد محمد (27)

محمد مرزا (28)

محمد سعید خان (29)

محمد اکبر (30)

محمد زاروق (31)

محمد علی خان (32)

محمد شریف (33)

عبدالرحمن (34)

عمران اللہ (35)

محمد شامد خان (36)

بہالتِ پنجاب پشاور ہائی کورٹ پٹور

اندنگل وغیرہ بنام ڈائریکٹر وغیرہ

دعویٰ

باعثِ تحریر ایسکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ آن مقام پشاور کے لئے سعد اللہ خان مروت ایڈووکیٹ ہائی کورٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا مکمل اختیار ہوگا نیز وکیل صاحب کو کرنے راضی نامہ و تقریر ثالث و فیصلہ برحلاف لینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری کی طرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور قبول ہوگا و دوران مقدمہ میں جو خرچہ و ہرجانہ التواء مقدمہ کے سبب سے ہوگا اس کے مستحق وکیل صاحب موصوف ہوں گے نیز لقا یا و خرچہ کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکور کریں۔

لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم

FILED TODAY

Deputy Registrar

18 NOV 2019

العبد العبد العبد

۱۱-
ارباب سیف اکمال
ایڈووکیٹ

من روینہ تاق
ایڈووکیٹ

سعد اللہ خان مروت
ایڈووکیٹ

75 شکیلا بانو - شکیلا بانو

(76) صائمہ خان - صائمہ خان

(77) باسرو - باسرو

(78) زینب بی بی - زینب بی بی

79 تاج بی بی - تاج بی بی

(80) آمنہ بی بی - آمنہ بی بی

جاوید الاظفار (101)

1st Part

Zahire زبیر سید (81)

Amelk - عمل خان (102)

Amir Mir (82)

عطا محمد (103)

Amir Mir (83)

Kheer Khan (104)

Abdul Aziz (84)

Younis (105)

Ahmed (85)

Nazir (106)

Amir Mir (86)

Amir Mir (107)

Noor Khan (87)

Amir Mir (108)

Abdul (88)

Amir Mir (109)

Muhammad (89)

Jehank (110)

Muhammad (90)

Hidayat (111)

Abdul (91)

Amir Mir (112)

Muhammad (92)

Zaid (113)

Amir Mir (93)

Amir Mir (114)

Muhammad (94)

Amir Mir (115)

Muhammad (95)

Amir Mir (116)

Pakistan (96)

Amir Mir (117)

Muhammad (97)

Amir Mir (118)

Shah (98)

Amir Mir (119)

Amir Mir (99)

Amir Mir (120)

Amir Mir (100)

Amir Mir (121)

Amir Mir (122)

Amir Mir (123)

Amir Mir

بھارت ہند پشاور عالی کورٹ پٹور

اندراج نمبر بنام ڈاکٹر و مہرہ

دعویٰ

باعث شکریہ ایکٹ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ آن مقام پشاور کے لئے سعید اللہ خان مروت ایڈووکیٹ ہائی کورٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف لینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر واختہ منظور قبول ہوگا و دوران مقدمہ میں جو خرچہ و ہرجانہ التواء مقدمہ کے سبب سے ہوگا اس کے مستحق وکیل صاحب موصوف ہوں گے نیز لقیات و خرچہ کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکور کریں۔

لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم

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Deputy Registrar

18 NOV 2019

العبد العبد العبد

(124) محمد اعظمی M. Anwar

(125) مسرت شاہ مسرت شاہ

(126) ملتان اورنگ

ارباب سید اکمال ایڈووکیٹ

سعید اللہ خان مروت ایڈووکیٹ

مس روینہ تاز ایڈووکیٹ

Amir Asw.

Noor	نوریه انصاری	143	دولت خان	(127)
Shah	شکیرہ خاتون	144	نورمرجان	(128)
Noor	نگینہ	145		
Noor	بی بی مسومہ	146	شہدہ حسن	(129)
Shah	سلمہ بنتش	147	م. زہرا	(130)
Shah	شمن جان	148	Cr. Kh	(131)
Shah	فتح خان	149	Noor	(132)
Jah	شاکر اللہ	150	Shah	(133)
Shah	ناجید	151	Tahir	(134)
Noor	علاء الدین بیگم	152	Wade	(135)
Alia	نجمہ بیگم	153	Mumtaz	(136)
Nah	نارنگ	154	Gohar	(137)
Noor	علامہ منقطعہ	155	Rah	(138)
Orhul	نگت	156	Arif	(139)
Noor	فاطمہ حبیب	157	Ahmed	(140)
Fahim	شایہ	158	Mumtaz	(141)
Shah	وارث خان	159		
Wah	نور جمال	160		
Wah	خان مایک	161		
Wah	نورہ رومی	162		
Wah	شایہ	163		
				(142) نورہ انصاری

بعدالت جناب پشاور ہائی کورٹ پٹور

اللہ گل وغیرہ بنام ڈائریکٹر پٹور

دعویٰ

باعث تحریر ایسکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ آن مقام پشاور کے لئے سعد اللہ خان مروت ایڈووکیٹ ہائی کورٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف لینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور رضی دعویٰ اور رجوعیت ہر قسم کی تصدیق اور اس پر دستخط کرانے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری کیٹرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پروا ختم منظور قبول ہوگا و دوران مقدمہ میں جو خرچہ و ہرجانہ التواء مقدمہ کے سبب سے ہوگا اس کے مستحق وکیل صاحب موصوف ہوں گے نیز بقایا و خرچہ کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکور کریں۔

لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

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Deputy Registrar

18 NOV 2019

العبد العبد العبد

11 -	سعد اللہ خان مروت	Hussain	مشرکہ بنیم	164
ارباب سیف اکمال	ایڈووکیٹ	Hukus	حاکم خان	165
ایڈووکیٹ		Strutau	غلام نبی	166
من روینہ تازہ		Naybansh	نانزہانی بی	167
ایڈووکیٹ		Naseebul	حسب اللہ	168

169 نور محمد

170 ماه حسين

171 ناصر احمد

172 حسن علي

173 نواز خان

174 سبحان الله

176 فار راج

177 نور حسين

178 وعيد

179 نور جهان

180 لائق حسين

181 عبدالملك

182 سالك

183 حفتر حسين

Before the Peshawar High Court Peshawar

CHECK LIST.

Case Title: <u>Anzar Gul et alVersus..... Director & others</u>		YES	NO
1.	Case is duly signed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2.	The law under which the case is preferred has been mentioned.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3.	Approved file cover is used.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.	Affidavit is duly attested and appended.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5.	Case and annexure are properly paged/ numbered according to index.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.	Copies of annexure are legible and attested. If not, then better copies duly attested have been annexed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7.	Certified copies of all the requisite documents have been filed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8.	Certificate specifying that no case on similar grounds was earlier submitted in this court, filed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9.	Case is within time.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10.	The value for the purpose of court fee and jurisdiction has been mentioned in the relevant column.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11.	Court fee in shape of stamp paper is affixed. (for writ Rs.500, for other was required).	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12.	Power of attorney is in proper form.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
13.	Memo of addresses filed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
14.	List of books mentioned in the petition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
15.	The requisite number of spare copied attached. (Writ Petition-3 Nos, Civil Appeal (SB-1, DB-2) Civil Revision (SB-1, DB-2).	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16.	Case (Revision/appeal/petition etc.) is filed on the prescribed form.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
17.	Power of attorney is attested by jail authority (for jail prisoner only).	<input type="checkbox"/>	<input checked="" type="checkbox"/>

It is certified that formalities/documents as requires in column 2 to 18 above, have been fulfilled.

Signature. Ullah Khan

Shafiq Ullah Khan Masurat

Advocate Peshawar.

Date: 18/11/2019.

For office use only.

Case No. _____

Case received. _____

Complete in all respect; Yes/No (if No the grounds) _____

Date in court. _____

Signature. _____

(Reader)

Countersigned _____

Date. _____
(Deputy Registrar)

18/11/19

**IN THE PESHAWAR HIGH COURT, PESHAWAR
OPENING SHEET FOR WRIT BRANCH**

Date of Filing: 19.07.2018

District: Peshawar

Case Type; Writ Petition

Nature of Original Proceedings:

Category Code

5	0	7	1	0
---	---	---	---	---

(Categories & Sub categories are given at the back of the opening sheet)

Review/ Contempt of Court in respect of:

Writ of:

Heabus
Corpus

Prohibition

Mandamus
✓

Qua
Warranto

Certiorari

If Certiorari:

Forum	Date	Interlocutory/ Final Order	Case Pertains to
			<input type="checkbox"/> SB <input checked="" type="checkbox"/> DB

Petitioner Name	Anzar Gul & Others
Mobile No.	0308-5331712, 0321-9026010
Address	Bara Khyber Agency
CNIC No.	21201-2701312-5
Email Address	

Counsel for Petitioner(s)	Saadullah Khan Marwat
Mobile No.	0300-5872676 0333-9107737
Address	Office: 21-A Nasir Mansion, Shoba Bazar, Peshawar.
CNIC No.	17301-5715943-7
Email Address	handsome9946@gmail.com

Respondents	1) Director of Education, FATA Secretariat, Warsak Road, Peshawar. 2) Agency Education Officer, Khyber Agency at Jamrud. 3) Agency Education Officer, North Waziristan Agency. 4) Agency Education Officer, FR Tank at D.I. Khan. 5) Agency Education Officer, Kurram Agency at Parachinar.
Address	

ORIGINAL ORDER/ ACTION/ INACTION COMPLAINED OF:
To declare order dated 29-08-2018 to be illegal.

PRAYER
Respondents be directed to regularize the initial service of the petitioners rendered in the Community Schools to the regular service for pensionery and other benefits.

LAW/ RULES/ GOVERNING THE ORIGINAL PROCEEDINGS/ ACTION/ LOCATION
Constitution of Pakistan, 1973,

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Deputy Registrar
18 SEP 2018

RE-FILED TODAY
Deputy Registrar
22 SEP 2018

Signature

Note: Any suggestion to improve the pre-format will be appreciated.

IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P. No. 4597P / 2018

Appeal No. 568/2023

Anzar Gul & Others

versus

Director & Others

I N D E X

S. No.	Documents Descriptions	Annex	Page #
1	Opening Sheet		A
2	Memo of Writ Petition		1-18
3	Affidavit		19
4	Addresses of Parties		20
5	Appointment orders	"A"	21-33
6	To save the closure of schools, 15-11-10	"B"	34
7	Regularization of schools dated 21-12-2011 / 26-04-2012	"C"	35-36
8	Summary for approval to regularize services dated 30-04-2012	"D"	37-39
10	Approval for regularization of posts dated 11-05-2012	"E"	40
11	Notification of adjustment against regular posts dated 29-10-2015	"F"	41
12	Order of regularization of services dated 02-11-2015, etc.	"G"	42-54
13	Representation dated 22-03-2017	"H"	55
14	Rejection order dated 29-08-2018	"I"	56
15	Notice		57
16	Court Fee of Rs. 500/=		
17	Wakalatnama		

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Through

Petitioner(s)

Saadullah Khan

Saadullah Khan Marwat
Advocate,
21-A Nasir Mension,
Shoba Bazar, Peshawar
Ph: 0300-5872676

Dated: 17-09-2018

IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P No. 4597/2018

Appeal No-568/2023

1. Anzar Gul S/O Zar Din, PST,
Government Primary School,
Saeed Ullah Jan Kalley,
Bara Khyber Agency.
2. Sadiq Ahmad S/O Sher Jan, PST,
Government Primary School
Toor Dara Jamrood Khyber Agency.
3. Khial Gul S/O Zahir Shah, PST,
Government Primary School Toor Dara,
Jamrood Khyber Agency.
4. Mohibullah S/O Ihsan Ullah, PST,
Government Primary School Toora
Tara Jamrood Khyber Agency.
5. Irat Khan S/O Ilyas Khan, PST,
Government Primary School Jani Khel,
Jamrood Khyber Agency
6. Muhammad Jan S/O Allah Baz, PST,
Government Primary School Nazar
Kalley, Landi Kotal Khyber Agency
7. Arman Gul S/O Lal Mat Khan, PST,
Government Primary School
Rekaley Jamrood Khyber Agency.
8. Ameen Shah S/O Mustan Shah, PST,
Government Primary School
Choor No. 03, Jamrood Khyber Agency.
9. Rehman Gul S/O Ghirat Gul, PST,
Government Primary School Attari,
Jamrood Khyber Agency.
10. Sabit Khan S/O Gul Mar Jan, PST,
Government High School Choor,
Jamrood Khyber Agency.

*Vide order
dt 6.11.2018
impleament
as a petitioners
no 164 to 183*

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11. Shah Wali S/O Payo Noor, PST,
Government Primary School
Fiazoo Kalley, Jamrood Khyber Agency.
12. Sajid Ahmad S/O Payo Khel, PST,
Government Primary School Wazir
Dand, Jamrood Khyber Agency.
13. Noorat Khan S/O Awal Khan, PST,
Government Primary School
Jawara Mania, Jamrood Khyber Agency.
14. Mushtaq Ullah S/O Abdul Qahar, PST,
Government Primary School
Nawar Mania, Jamrood Khyber Agency.
15. Tariq Khan S/O Khan Sahib Khan, PST,
Government Primary School Khan Mast
Kalley, Jamrood Khyber Agency.
16. Shufqat Ullah S/O Gul Said Khan, PST,
Government Primary School Khadim
Kalley, Jamrood Khyber Agency.
17. Jam Dad Khan S/O Jan Muhammad Khan,
PST, Government Primary School Wallo Milla,
Jamrood Khyber Agency.
18. Sher Zali S/O Khan Badshah, PST,
Government Primary School Meer
Ahmad Shah Kalley, Jamrood Khyber Agency.
19. Umar Khan S/O Lal Mat Khan, PST,
Government Primary School Redi Gul
Kalley, Jamrood Khyber Agency.
20. Saleh Jan S/O Khaista Meer, PST,
Government Primary School
Lashora Jamrood Khyber Agency.
21. Abdul Qadir S/O Abdul Jalil, PST,
Government Middle School Sher
Afzal Kalley, Jamrood Khyber Agency.
22. Muhammad Wakeel S/O Abdul Jalil, PST,
Government Primary School Kambila
Malagori, Khyber Agency.

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23. Fazale Rehman S/O Masooz Khan, PST,
Government Primary School Mian
Jaffar Shah Kalley, Jamrood Khyber Agency.
24. Istekhar Khan S/O Rooh Khan, PST,
Government Primary School Pastoki,
Landi Kotal Khyber Agency.
25. Farid Ullah S/O Kabal Sher, PST,
Government Primary School Gulab
Kalley, Landi Kotal Khyber Agency.
26. Serfarz Khan S/O Anwar Khan, PST,
Government Primary School Jawara
Mela, Malagori Khyber Agency.
27. Janab Khan S/O Shoghli Maan Khan,
PST, Government Primary School
Lashora Jamrood Khyber Agency.
28. Samad Meer S/O Muhammad Said,
PST, Government Primary School Lal
Mat Kalley, Jamrood Khyber Agency.
29. Islam Gul S/O Nabat Khan, PST,
Government Primary School Fazal
Ahmad Kalley, Jamrood Khyber Agency.
30. Gulab Sher S/O Aqal Meer, PST,
Government Primary School
Malak Sardar Meer Kalley,
Jamrood Khyber Agency.
31. Muhammad Saeed Khan S/O
Enzar Gul, PST, Government Primary
School Zabit Khan Kalley,
Jamrood Khyber Agency.
32. Umar Said S/O Sir Meer Khan, PST,
Government Primary School
Chapari, Jamrood Khyber Agency.
33. Hunar Said S/O Sir Meer Khan, PST,
Government Primary School Kambila,
Jamrood Khyber Agency.
34. Anzal Khan S/O Kazam Baig, PST,
Government Primary School
Gujjar Dand, Jamrood Khyber Agency.

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35. Fazal Rabi Khan S/O Ghulam Nabi, PST,
Government Primary School, Ali Masjid,
Jamrood Khyber Agency.
36. Mir Habib S/O Fazal Khan, PST,
Government High School Badshah
Meer Kalley, Jamrood Khyber Agency.
37. Wazir Khan S/O Said Ullah Khan,
PST, Government Primary School
Sandana, Bara Khyber Agency.
38. Khyal Batt Khan S/O Doulat Khan, PST,
Government Higher Secondary School
Speen Dand, Jamrood Khyber Agency.
39. Samin Gul S/O Zar Khalil, PST,
Government Primary School Sher
Bahadar Kalley, Bara Khyber Agency.
40. Yar Muhammad S/O Mirza Gul, PST,
Government Primary School Zareef Kalley,
Bara Khyber Agency.
41. Muhammad Khan S/O Shaus Khan, PST,
Government Primary School Raza Khan,
Bara Khyber Agency,
42. Miraj Gul S/O Zain Gul, PST,
Government Primary School Kotkai
Tirah, Bara Khyber Agency.
43. Abid Khan S/O Zain Gul, PST,
Government Primary School Zafar Khan
Kalley, Bara Khyber Agency.
44. Hujat Khan S/O Samand Khan, PST,
Government Primary School Azam Din,
Bara Khyber Agency.
45. Said Ghani S/O Anar Gul, PST,
Government Primary School Kotaki,
Bara Khyber Agency.
46. Siraj Akbar S/O Muqem Khan, PST,
Government Primary School Mamal Mela,
Bara Khyber Agency.

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47. Karna Khel S/O Talib Shah, PST,
Government Primary School
Mashkanara Mela, Bara Khyber Agency.
48. Syed Ahmad S/O Lal Madar, PST,
Government Middle School
Sheen Kamar, Bara Khyber Agency.
49. Hameed Ullah S/O Afsar Khan, PST,
Government Primary School Choorra,
Bara Khyber Agency.
50. Iqbal Hussain S/O Zar Muhammad,
PST, Government Primary School
Zangai Bara Khyber Agency.
51. Shahid Khan S/O Muqam Din, PST,
Government High School Jafar Khan Kalley,
Bara Khyber Agency.
52. Suleman Shah S/O Gul Badshah,
PST, Government Primary School Pastoki,
Bara Khyber Agency.
53. Shah Je Khan S/O Gul Zameer, PST,
Government Primary School Zafar Kalley,
Bara Khyber Agency.
54. Abdul Qayum S/O Rehmat Gul, PST,
Government Primary School Gulab Khel,
Bara Khyber Agency.
55. Gul Amin S/O Angar Khan, PST,
Government Primary School
Khuramtan Kalley, Bara Khyber Agency.
56. Gul Zaman S/O Sturee Khan, PST,
Government Primary School
Yar Hamza Kalley, Bara Khyber Agency.
57. Raj Muhammad S/O Zahir Shah,
PST, Government Primary School
Kotkai, Bara Khyber Agency.
58. Bakht Mar Jan S/O Qandahar Khan, PST,
Government Primary School Habib Shah,
Bara Khyber Agency.

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59. Raees Khan S/O Nauroz Khan, PST,
Government Primary School
Jafar Khan Kalley, Bara Khyber Agency.
60. Mir Akbar S/O Gul Akbar, PST,
Government Primary School Zangai,
Bara Khyber Agency.
61. Muhammad Raziq S/O Noor Zada,
PST, Government Primary School
Baber Khel Kalley, Bara Khyber Agency.
62. Guli Jan S/O Baghwan Gul, PST,
Government Primary School
Zafar Kalley, Bara Khyber Agency.
63. Shariat Khan S/O Lal Mar Jan, PST,
Government Primary School
Zafar Kalley, Bara Khyber Agency.
64. Abdul Rehman S/O Paya Khan, PST,
Government Primary School
Bine Bara Khyber Agency.
65. Irfan Ullah S/O Chaman Khan, PST,
Government Primary School Zangi,
Bara Khyber Agency.
66. Khaista Noor S/O Waliyat Shah,
PST, Government Primary School
Hayat Mir, Bara Khyber Agency.
67. Gul Hameed S/O Noor Zaden, PST,
Government Primary School
Hukam Shah, Bara Khyber Agency.
68. Saeeda Jehanzeb D/O Jehanzeb, PST,
Government Girls Primary School
Yar Gul Khel Kalley, Bara Khyber Agency.
69. Sajid Ullah S/O Gul Samand, PST,
Government Primary School
Sandana, Bara Khyber Agency.
70. Zenat D/O Abdul Qayum, PST,
Government Girls Primary School
Hayat Shah, Bara Khyber Agency.

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71. Nadia Tabasum D/O Fazal Rahim,
PST, Government Girls Primary School
Sandana, Bara Khyber Agency.
72. Farzana Jabeen D/O Qamar Din, PST,
Government Girls Primary School
Sultan Khel, Bara Khyber Agency.
73. Roeeda Gul D/O Zareen Khan, PST,
Government Girls School Islam Gul,
Bara Khyber Agency.
74. Rubina Shaheen D/O Faqir Muhammad,
PST, Government Girls Primary School
Amir Khan Kalley, Bara Khyber Agency.
75. Shakeela Bano D/O Ghulam Muhammad,
PST, Government Girls Primary School
Kapar Tangi, Bara Khber Agency.
76. Saima Khan D/O Dr. Khan, PST,
Government Girls Primary School
Mkkhar Kot, FR Tank.
77. Basroo D/O Muhammad Zaman, PST,
Government Girls Primary School
Payo Kot, FR Tank.
78. Zainab Bibi D/O Hussain, PST,
Government Girls Primary School
Nawaz Khan Korona, FR Tank.
79. Taj Bibi D/O Qalam Khan, PST,
Government Girls Primary School
Mussam Khan, FR Tank.
80. Amna Bibi D/O Esa Khan, PST,
Government Girls Primary School
Akram Khan, FR Tank.
81. Zaheena Sayed D/O Noor Muhammad Khan,
PST, Government Girls Primary School
Denak, FR Tank.
82. Ambareen Bibi D/O Ghulam Qadir, PST,
Government Girls Primary School
Ghulam Sahee, FR Tank.

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Deputy Registrar
18 SEP 2018

83. Bilal Khan S/O Mamid Khan, PST,
Government Primary School
Shahbaz Kot, North Waziristan Agency.
84. Abdul Ghafoor Khan S/O Gul Abad Khan,
PST, Government Primary School
Neik Umar Kot, NWA.
85. Afrasiyab Khan S/O Akhtar Ali Khan,
PST, Government Primary School
Surma Jan Kot, NWA.
86. Aziz Ullah S/O Payel Khan, PST,
Government Primary School
Macha Khel, NWA.
87. Nor Zali Khan S/O Ghulam Jalil Khan,
PST, Government Primary School
Dewgar Saidgi, NWA.
88. Abdul Mutalib Khan S/O Sakhi Mar Jan,
PST, Government Primary School
Issor Kot, NWA.
89. Muhammad Ilyas S/O Badiuzaman,
PST, Government Primary School
Nimat Kot, NWA.
90. Muhammad Ghufuran S/O Inayat Ullah Khan,
PST, Government Primary School
Muhammad Amin Kot, NWA.
91. Ubaid Ullah Khan S/O Niaz Bat Khan,
PST, Government Primary School
Khwaja Wani, NWA.
92. Gul Attaullah S/O Umar Khan, PST,
Government Primary School
Muhammad Amin, NWA.
93. Hamid Ullah S/O Amir Muhammad, PST,
Government Primary School
Fazal Rehman, NWA.
94. Muhammad Zaman S/O Hazrat Khan,
PST, Government Primary School
Jalalabad Kot, NWA.

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18 SEP 2018

17

95. Tehsil Khan S/O Bakhel Jan, PST,
Government Primary School
Payo Jan Kot, NWA.
96. Muhammad Aslam Khan S/O Gul Rehman,
PST, Government Primary School
Wali Mad Khan Kot, NWA.
97. Noor Sala Khan S/O Yaqoob Khan, PST,
Government Primary School
Niamat Kot, NWA.
98. Shah Wazir S/O Yaqoob Khan, PST,
Government Primary School
Mir Ali Camp, NWA.
99. Baz Muhammad Khan S/O
Muhammad Azam Khan,
PST, Government Primary School
Rai Khan Kot, NWA.
100. Abid Ullah Khan S/O Mir Kalam Khan,
PST, Government Primary School
Abdi Khel, NWA.
101. Javid Iqbal S/O Amir Akbar, PST,
Government Primary School
Fateh Khan Kot, NWA.
102. Amal Khan S/O M. Nawaz Khan,
PST, Government Primary School
Rai Khan, NWA.
103. Atta Muhammad S/O Ghulam Muhammad,
PST, Government Middle School
Khair Khel Kalley, NWA.
104. Khan Walli S/O Mir Sali Khan, PST,
Government Primary School
Darpa Khel Kot, NWA.
105. Pawan Din S/O Gul Zaman, PST,
Government Primary School
Zar Jam Khel, NWA.
106. Nazar Gul S/O Ajeeb Gul, PST,
Government Primary School
Hangu Kot, NWA.

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18 SEP 2018

107. Amir Nawaz Khan S/O Akbar Khan,
PST, Government Primary School
Sakhi Marjan, NWA.
108. Arif Nawaz S/O Akbar Khan, PST,
Government Primary School
Mushki Alam, NWA.
109. Muhammad Ayaz Khan S/O Arsala Khan,
PST, Government Primary School
Noor Khan, NWA.
110. Jahan Baz Khan S/O Rameez Khan,
PST, Government Primary School
Hakeem Kot, NWA.
111. Hidayat Ullah S/O Pakhar, PST,
Government Middle Primary School
Patas Kot, NWA.
112. Aqal Zaman S/O Khushal Khan,
PST, Government Primary School
Abdullah Din, NWA.
113. Mir Shah jehan S/O Khyal Khan,
PST, Government Primary School
Sakhi Mar Jan, NWA.
114. Zahid ud Din S/O Ahmad Kaleem,
PST, Government Primary School
Syed Khan Kot, NWA.
115. Janat Khan S/O Mir Azam Khan,
PST, Government Primary School
Shahadat Kot, NWA.
116. Amir Salah Khan S/O Sharen Khan,
PST, Government Primary School
Usman Khel, NWA.
117. Hazrat Ullah S/O Sahib Khan, PST,
Government Primary School
Garyum, NWA.
118. Muhammad Ihsan S/O Sharen Khan,
PST, Government Primary School
Muhammad Daraz, NWA.

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18 SEP 2018

119. Nor Hayat Khan S/O Nawab Khan,
PST, Government Primary School
Zaman Khan Kot, NWA.
120. Ata Ullah Jan S/O Maiz Ullah Khan,
PST, Government Primary School
Walli Mad Khan, NWA.
121. Farmanullah S/O Toor Jan, PST,
Government Primary School
Zaman Khan, NWA.
122. Sarfaraz S/O Gul Raheem, PST,
Government Primary School
Noor Khan, NWA.
123. Muhammad Kamal Khan S/O M. Alam,
PST, Government Primary School
Gulab Khel, NWA.
124. Muhammad Asghar S/O Sayed Wali,
PST, Government High School
Ghondi Jamrood Khyber Agency.
125. Ezat Shah S/O Nooram Shah, PST,
Government Primary School
Arak, Kurram Agency.
126. Multan Aurang S/O Gul Samand,
PST, Government Primary School
Chapre, Kurram Agency.
127. Daulat Khan S/O Bahadar Khan,
PST, Government Primary School
Kamal Baza, Kurram Agency.
128. Nor Mar Jan S/O Gul Mar Jan, PST,
Government Primary School
Mir Bagh, Kurram Agency.
129. Shughla Hussain D/O Ghulam Hussain,
PST, Government Girls Primary School
Dogar, Kurram Agency.
130. Muhammad Zubair S/O Dilbar Khan,
PST, Government Primary School
Dagari No. 03, Kurram Agency.

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Deputy Registrar
18 SEP 2018

131. Gul Haider Jan S/O Ghazi Mar Jan,
PST, Government Primary School
Dagari, Kurram Agency.
132. Noor Khan S/O Zari Gul, PST,
Government Primary School
Mir Bagh, Kurram Agency.
133. Shareef Gul S/O Gul Mar Jan, PST,
Government Primary School
Kalat Mir Bagh, Kurram Agency.
134. Tahir Gul S/O Akhtar Gul, PST,
Government Primary School
Pastwan, Kurram Agency.
135. Wasim Shah S/O Sayed Anwar,
PST, Government Primary School
Super Kot, Kurram Agency.
136. Maqbool Ahmad S/O Muhammad Jan,
PST, Government Primary School
Sher Khan Mir Bagh, Kurram Agency.
137. Gohar Simab W/O Doost Muhammad,
PST, Government Girls Primary School
Shahbaz Samma, Kurram Agency.
138. Riffat Naz W/O Sheeren Badshah, PST,
Government Girls Primary School
Shahbaz Samma, Kurram Agency.
139. Gul Zahra D/O Zameen Akbar, PST,
Government Girls Primary School
Kagawaga, Kurram Agency.
140. Hussan Par D/O Nasir Hussain, PST,
Government Girls Primary School
Dall, Kurram Agency.
141. Nighat Naseem D/O Laiq Hussain, PST,
Government Girls Primary School
Lar Zar, Kurram Agency.
142. Fozia Afzal D/O Muhammad Afzal, PST,
Government Girls Primary School
Luqman Khan, Kurram Agency.

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18 SEP 2018

143. Naveeda Asghar D/O Asghar Jan, PST,
Government Girls Primary School
Adil Colony, Kurram Agency.
144. Shakeel Khatoon D/O Rehmat Hussain,
PST, Government Girls Primary School
No. 01 Para Chinar, Kurram Agency.
145. Nageena D/O Ali Mohgib, PST,
Government Girls Primary School
Amal Kot, Kurram Agency.
146. Bibi Masooma D/O Sayed Agzal, PST,
Government Girls Primary School
Para Chinar, Kurram Agency.
147. Salma Bangesh D/O Rajab Ali, PST,
Government Girls Primary School
Luqman Khel Sehra, Kurram.
148. Shamal Jan Afridi S/O Sayal Khan Afridi,
PST, Government Primary School Dada Nika,
Bara Khyber Agency.
149. Fateh Khan S/O Mula Khel, PST,
Government Primary School Mashkano
Mela, Bara Khyber Agency.
150. Shakir Ullah S/O Shah Bahader,
PST, Government Primary School
Sheen Kamar, Bara Khyber Agency
151. Najida D/O Tahseen Ullah, PST,
Government Girls Primary School
Shekmal Khel, Bara Khyber Agency.
152. Alia Begium D/O Ghulam Jan, PST,
Government Girls Primary School
Musa Khan, Landi Kotal.
153. Najma Begium D/O Hameed Khan,
PST, Government Girls Primary School
Turkistan Kalley, Bara Khyber Agency.
154. Naz Gul D/O Mehar Dil, PST,
GFCS Mulagori, Jamrood
Khyber Agency.

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18 SEP 2018

155. Ghulam Mustafa S/O Sharbat Khan, PST, Government Primary School Nasir Kalley, Jamrood Khyber Agency
156. Nighat D/O Yar Muhammad, PST, Government Girls Primary School Khyal Gul Kalley, Landi Kotal.
157. Fatmia Habib D/O Ghulam Habib, PS Government Girls Primary School Kose Wali Khel, Landi Kotal
158. Khan Malik S/O Amir Jan, PST, Government Primary School Kotki, Bara Khyber Agency.
159. Shahid S/O Muhammad Sarwar, PST, Government Primary School Jaffar Khan Kalley, Bara Khyber Agency
160. Noor Jamal S/O Shamal Jan, PST, Government Primary School Mastk, Bara Khyber Agency.
161. Waris Khan S/O Naseer Khan, PST, Government Primary School Khana Zyarat, Bara Khyber Agency.
162. Naveeda Robi D/O Madad Khan, PST Government Girls Primary School Hayat Khan Kalley, Jamrood Khyber Agency
163. Shabana D/O Masal Khan, PST, Government Girls Primary School Neki Khel, Landi Kotal Khyber Agency
- All C/O Petitioner No. 1.
164. Jamshida Bangesh D/O Laiq Hussain, PST, Govt. Girls Primary School, Zeran Kurram Agency.
165. Hukam Khan S/O Said Jamal; PST, Govt. Primary School, Hasham Kalley, Khyber Agency.
166. Ghulam Nabi S/O Lalmar Jan, PST, Govt. Primary School Midan Gul Kalley, Khyber Agency.
167. Nazo Bibi D/O Amir Hussain, PST, Govt. Girls Middle School, Sur Kamar, Jamrood Khyber Agency.
168. Najeeb Ullah S/O Swal Din, PST, Govt. Primary School, Hakim Khan Kalley, Khyber Agency.
169. Noor Marjan S/O Israr Gul, PST, Govt. Primary School, Lal Muhammad Khan, Bara Khyber Agency.
170. Mah Jabeen D/O Faqeer Gul, PST, Govt. Girls Primary School, Anwar Shah Kalley, Bara Khyber Agency
171. Maryam Ijaz D/O Mir Ijaz Hussain, PST, Govt. Girls Primary School, Khandar-Bara Khyber Agency.
172. Bas Bibi D/O Badshah Gul, PST, Govt. Girls Primary School, Hanif Jan Kalley Bara Khyber.
173. Khatira D/O Khan Muhammad PST, Govt. Girls Primary School, Abdul Kareem Kalley Jamrood Khyber Agency.
174. Niaz Jan S/O Noor Bad Shah,

VERSI

1. Director of Education, FATA Sec Warsak Road Peshawar.
2. Agency Education Officer, Khyber Agency at Jamrud.

*Petitioner
No 164 to
183
impled
vide order
dt 6/11/13*

- 3. Agency Education Officer,
North Waziristan Agency.
- 4. Agency Education Officer,
FR Tank at D.I. Khan.
- 5. Agency Education Officer,
Kurram Agency at Parachinar. Respondents

27

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WRIT PETITION UNDER ARTICLE
199 OF THE CONSTITUTION OF
ISLAMIC REPUBLIC OF PAKISTAN,
1973:

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Respectfully Sheweth:

1. That in order to raise literacy level in FATA and make the education available at the door step, the Project of opening Community Schools was launched under FATA Annual Development Program in the year 1998. Since 1998 till 20-10-2010, 956 Community Schools were opened throughout FATA wherein 1912 teachers (02 per schools) were appointed and for the purpose, petitioners were appointed as PST since 2003, etc. (Copies as annex "A")
2. That petitioners after appointment in due course of law i.e. advertisement, etc. used to perform satisfactory services to the department and no complaint, whatsoever, was made against them but their performance was highly appreciated.
3. That it happened so, and was / is in the knowledge of everyone that Settled area generally and FATA areas particularly faced worst law and order situation at the un-mercy hands of miscreants. Government machinery was totally failed as the miscreants were not only ruling the area but the kidnapped, beheaded and blasted Govt. assets, especially educational institutions was the main target. Petitioner's schools came under the said dilemma as many schools were blown up.

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18 SEP 2018

Regarding the aforesaid aspects of the schools after receiving reports to the authorities about the destructions of the schools reports were made about its none functional of the schools in FATA and it was decided to close the same because the teachers were getting their salaries without performing duties in the schools. The authorities terminated their services of teachers and other staff.

4. That after the said action, teachers the local elders and its union made efforts to save the services of the teachers and other staff vide letter dated 15-11-2010, as by then, the wave of miscreants to some extent was released. (Copy as annex "B")
5. That Standing Committee of SAFRAN held meeting on 21-12-2011 at Parliament House Islamabad to regularize services of petitioners and it was recommended that FATA Secretariat should regularize the services of Community School Teachers including their previous services and graded pay as per previous practice without further delay. Summary will be also moved for approval of Governor KP, for relaxation in recruitment rules and regularization of the Community School Teachers from the date of initial recruitment against the posts vide letter dated 16-01-2012, followed by subsequent letter dated 26-04-2012. (Copies as annex "C")
6. That on 30-04-2012, Summary for the purpose was submitted before the Governor KP and approved the same to regularize services of the Community School Teachers and other staff. (Copy as annex "D")
7. That on 11-05-2012, Secretary, Social Sectors department FATA Secretariat, Peshawar issued notification, stating therein that the Governor has approved the appointment of the Community School Teachers against regular posts of PST B-07 in respective Agencies and FRs purely on merit basis with some terms and conditions mentioned therein. (Copy as annex "E")
8. That on 29-10-2015, Secretary Social Sector, FATA issued subsequent notification regarding adjustment of Community School Teachers against regular posts of PST was allowed on merit basis in accordance with policy. (Copy as annex "F")

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18 SEP 2018

9. That after taking into account all aspects of the case, the authority was pleased to regularize services of petitioners vide order dated 02-11-2015, 07-01-2016, 08-01-2016, 20-07-2016, 20-07-2016, etc. (Copies as annex "G")
10. That petitioners rendered services in the schools on contract basis for more than 10 years but no benefit of the same was extended to them to count the same for pensionary benefits, so submitted representation before Director Education FATA Secretariat, Peshawar on 22-03-2017, but the same was regretted for no legal reason vide notification dated 29-08-2018. (Copies as annex "H" & "I")

Hence this Writ Petition, inter alia, on the following grounds:

GROUND

- a. That admittedly petitioners served the department after initially appointing them in the schools from the date of their appointment in the schools and served the department devotedly.
- b. That the schools were closed due to law and order situation by the authorities while on the other hand, petitioners never refused to perform duty and such aspect of the case shall not be attributed to them.
- c. That as and when services of petitioners were regularized, the same should have been from the date of initial appoint and not with immediate effect as at the same time, petitioners performed their duty like other regular employees of the department.
- d. That fresh vacancies were created at the time of appointment of petitioners in the schools. There was no difference in the duties of the contract employees as well as of the regular employees, thus petitioners was not treated at par and discriminated.
- e. That petitioners seeks relief of the rendered services to be counted towards pensionary benefits and non the else.
- f. That petitioners files the petition in hand before this hon'ble court to adjudicate upon as no term and condition of the existing service is violated, so the hon'ble court has the exclusive jurisdiction in the matter.

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18 SEP 2018

- g. That services of some of the employees of the Community schools have been regularized / counted towards the present service, petitioners also deserves the said treatment.
- h. That by not treating petitioners at par with other colleagues / regular employees of the department by the authority is not only discrimination but such act is based on malafide.

It is, therefore, most humbly prayed that on acceptance of the Writ Petition, in exercise of the extraordinary constitutional jurisdiction, this hon'ble Court may graciously be pleased to:


- a. Declare notification dated 29-08-2018 of the R. No. 01 to be illegal, improper, unjust, discriminatory, malafide, without lawful authority and of no legal effect.
- b. Direct the authority to regularize the initial service of the petitioners rendered in the Community Schools to the regular service for pensionary and other benefits;

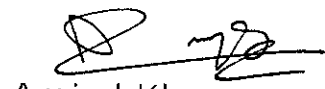
AND / OR

- c. Any other writ/order/direction deemed proper and just in the circumstances of the case be also issued/ordered/given.

Petitioners

Through


Saadullah Khan Marwat


Amjad Khan

Advocates,

Dated: 17-09-2018

LIST OF BOOKS:

1. Constitution
2. W.P. No. 2307/13

CERTIFICATE:

FILED TODAY
Deputy Registrar
18 SEP 2018

As per instructions of my client, certified that no such like Writ Petition was earlier filed by the petitioner before this Honorable Court.
(it's a DB case)



Advocate

27

IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P No. 4597P /2018

Anzar Gul & Others versus Director & Others

AFFIDAVIT

I, Anzar Gul S/O Zar Din, PST, Government Primary School Saeed Ullah Jan Kalley, Bara Khyber Agency, (Petitioner No. 01) do hereby solemnly affirm and declare that the contents of the **Writ Petition** are true and correct to the best of my knowledge and belief.

Identified By:

Saadullah Khan

Saadullah Khan
Advocate,

Anzar Gul

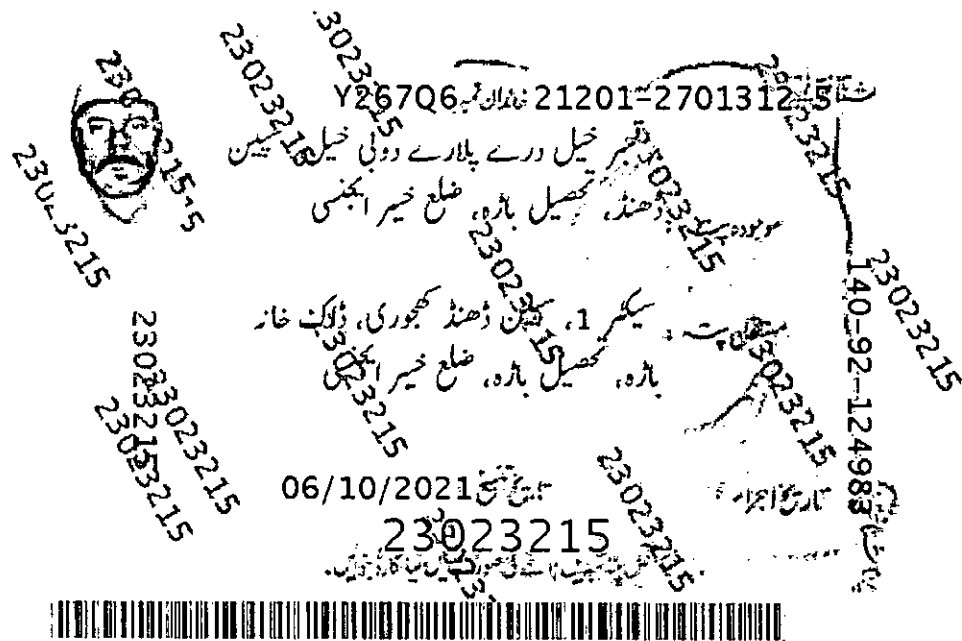
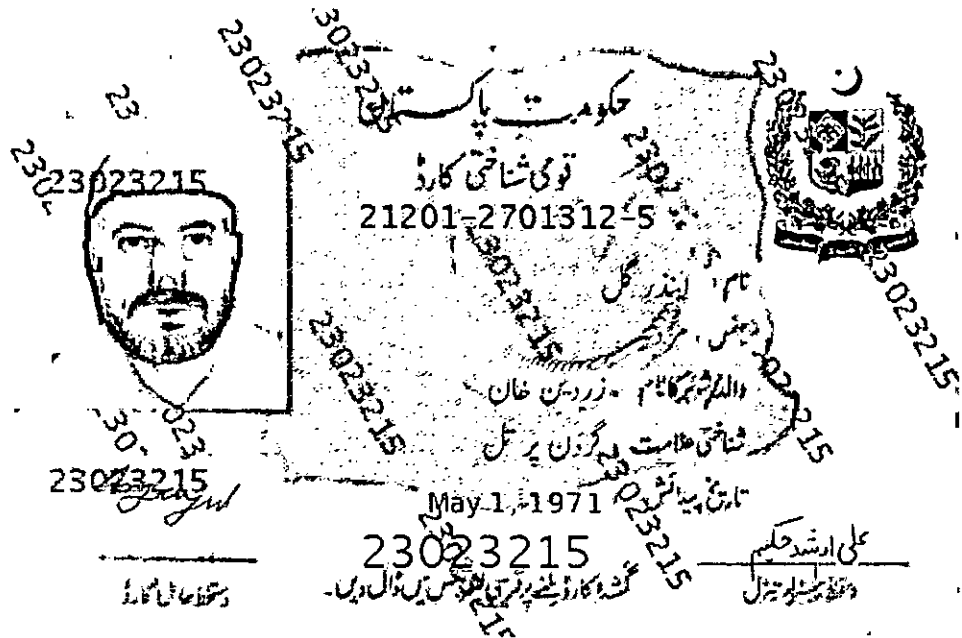
DEPONENT

CNIC#: 21201-2701312-5

No:.....	<u>6600</u>
Certified that the above was verified on solemnly affirmation before me on this <u>17th</u> day of <u>SEP</u> 18, <u>Anzar Gul</u> s/o <u>Zar Din</u> <u>Khyber Agency</u> who was identified by <u>Saadullah Khan</u> Who is personally <u>known</u> to me.	
<u>[Signature]</u> Peshawar, <u>17/9/18</u>	

FILED TODAY
Deputy Registrar
18 SEP 2018

Nadra Verified



Census 1998 Database. [x]

There is no record for this individual in the census database. Either no census data was registered, or lacks necessary identity information that could be used for linking the record with this individual.

Other Information that does not appear on card [x]

Place of Birth	خیبر ایجنسی
Religion	Islam
Mother's Name	بیاز گلہ

Digital Signature [x]

Asymmetric RSA digital signature on MD5 hash of the concatenation of the identity card number, forward slash, year of birth, forward slash, lowercase of the hexadecimal of the unicode representation of the name. In this instance, verify that this corresponds to the string 2120127013125/1971/ہش

IN THE PESHAWAR HIGH COURT, PESHAWARW.P No. _____ /2018 29

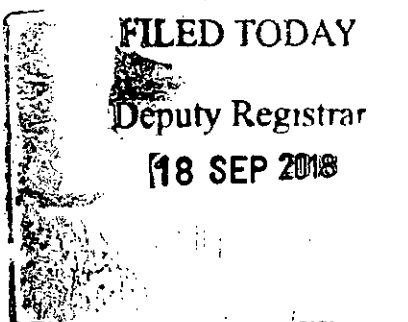
Anzar Gul & Others versus Director & Others

ADDRESSES OF THE PARTIES**PETITIONERS:**

All C/O Anzar Gul S/O Zar Din,
 PST, Government Primary School,
 Saeed Ullah Jan Kalley,
 Bara Khyber Agency, Petitioner No. 01

RESPONDENTS:

1. Director of Education, FATA Secretariat,
Warsak Road Peshawar.
2. Agency Education Officer,
Khyber Agency at Jamrud.
3. Agency Education Officer,
North Waziristan Agency.
4. Agency Education Officer,
FR Tank at D.I. Khan.
5. Agency Education Officer,
Kurram Agency at Parachinar



Dated: 17-09-2018

Through

Petitioners

Saadullah Khan Marwat
 Advocates

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AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD.
APPOINTMENT ORDER.

Consequent upon the recommendation of Political Administration & approval by the Director of Education FATA (NWFP) Peshawar, the following candidates are hereby appointed against the project post of PTC in BPS No.7/PM fixed for the project period of 03-years at Boys Communal Schools in Landi Kotal/Bara/Jamrud Tehsil Khyber Agency with effect from the date of taking over charge.

S#	Name/ Father name	Qual:	Name of School	Remarks
1.	Noor Marjan s/o Haji Hisar Gul	SSC	BCS Khushdil Khan Killi Qazian BQK Tirah Bara	Against Vacant post
2.	Tariq Usman s/o Arsala Khan	SSC	BCS Khushdil Khan Killi Qazian BQK Tirah Bara	Against Vacant post
3.	Inzar Gul s/o Haji Zardin	SSC	BCS Haji Salim Khan Tambo BQK Tirah Bara	Against vacant post
4.	Khial Bat Khan s/o Dolat Khan	SSC	BCS Haji Salim Khan Tambo BQK Tirah Bara	Against vacant post
5.	Abdul Qadus s/o Haji Ulas Khan	SSC	BCS Fazal Dad Killi Karkey Tirah Bara	Against vacant post
6.	Muhammad Farooq s/o Fazal Khalig	FA	BCS Fazal Dad Killi Karkey Tirah Bara	Against vacant post
7.	Shoukat Khan s/o Khan Bahadar	SSC	BCS Malik Mahmood Killi Army Building BZK	Against vacant post
8.	Khalid Shah s/o Millat Khan	SSC	BCS Gul dad spori Khula Tirah Jamrud	Against vacant post

Note:

11. The employee shall serve the Govt. as communal school teachers from the date of assumption of Charge.
12. They shall devote his whole time to their duties as Communal School Teacher.
13. They shall submit himself to the lawful orders of the Govt. officers.
14. They shall motivate the parents to send their children to school.
15. ~~These postings will not be transferable; however, local teachers preferably trained can be adjusted against regular posts on case to case basis.~~
16. They shall produce Health and Age certificate from the Agency Surgeon concerned.
17. Their original Education Qualification, date of date of birth and Domicile certificate should be checked before handed over charge of the school/office.
18. If they fails to report within 15 days the order will be treated as cancelled.
19. Charge report should be submitted to all concerned.
20. They will not be handed over the charge if they are below 18 years and above 33 years of age.

(DIBAR KHAN)
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD
dated 24.04.2004

Endst. No. 2303-09

Copy of the above is forwarded to the:-

1. The Additional Secretary Governor's Secretariat Govt. of NWFP Peshawar.
2. Director of Education FATA (NWFP) Peshawar.
3. Political Agent Khyber at Peshawar.
4. Agency Accounts Officer Khyber at Peshawar.
5. Asstt: Political Agent Tehsil Bara Khyber Agency.
6. Asstt: Political Agent Tehsil Jamrud Khyber Agency.
7. Asstt: Political Agent Tehsil Landi Kotal Khyber Agency.
8. S.A.P (Coordination) FATA PE&D Department Govt. of NWFP Peshawar.
9. Candidates Concerned.

Sd/-
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

A. K. S.

Consequent upon the approval of the Departmental selection committee the following untrained PTC (Male) local candidates of Khyber Agency are hereby temporarily appointed in Communal Schools on contract basis against vacant PTC post in BPS No. 7/PM Fixed plus usual allowances as admissible to them under the rules w.e.f 01.08.2006 their taking over charge in the schools noted against their names in the interest of public services.

S.No	Name/Father's Name	Appointed at	Remarks
01	Sadiq Ahmed S/O Sher Jan	BCS Choorai	Against Vacant post
02	Irfan Ullah S/O Jan Muhammad	..do..	.do.
03	Fazal Amin S/O Fida Muhammad	BCS Kachkool	.do.
04	Waris Khan S/O Nasir Khan	BCS Adam Khan	..do.
05	Gul Raziq S/O Jurna Khan	BCS Pathai	.do.
06	Muhammad Hamim S/O Muhammad Shin	..do..	.do.
07	Abdul Gadir S/O Abdul Jalil	BCS Zarnast	.do.

1. Charge report should be submitted to all concerned.
2. The appointment of the candidates has been made purely on contract basis and is liable to terminate without assigning any notice in case candidates wished to resign their services, they will have to give one month prior notice or forfeit one month pay in lieu thereof.
3. They should produce their original academic/professional certificates/ Domestic before their taking over charge and attested copies thereof to be kept on the record of the school/office after the verification from the Board/University concerned.
4. They should produce their Health and Age certificate from the Agency surgeon concerned.
5. They should not be hand over charge, if they are below 18 years or above 33 years of age.
6. If they fail to report their arrival with in 15 days the order will be treated as cancelled.
7. Trained local candidates are permissible for transfer any where against available vacant post on case to case basis.

(MR. ABDUR RASHID QUAKISHI)
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

Indst: No 11337-41/Khy: P.T.C (M)

Dated 26-7-2006

Copy forwarded to the:-

1. Director of Education FATA (NWFP) Peshawar
2. Agency Accounts Officer Khyber at Jamrud
3. AAEO (Concerned) local Office
4. Accountant local office
5. Candidates concerned.

Abdur Rashid Quakishi
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

Fair CopyOFFICE OF THE AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD.
APPOINTMENT ORDER.

Consequent upon the recommendation of Political Administration & approval by the Director of Education FATA (NWFP) Peshawar, the following candidates are hereby appointed against the project post of PTC in BPS No.7 for the project period of three years (03) at Boys Communal Schools in inaccessible area of Tirah Khyber Agency against newly created posts with effect from the date of their taking over charge in the school noted against each:-

S#	Name/ Father name	Qualification	Name of School
1.	Jan Wali s/o Said Bad Shah	SSC	BCS Haji Guldad Mishak Khel
2.	Khan Nawaz s/o Khana Khel	SSC	BCS Nik Amal Madu Khel
3.	Baitullah s/o Tamas Khan	SSC	BCS Yahid Ahmad Sher Khan Khel
4.	Muhammad Sadiq s/o Abdul Rehman	SSC	BCS Yahid Ahmad Sher Khan Khel
5.	Noor s/o Mastan Shah	SSC	BCS Mewa Khan Qadarn Khel
6.	Amin Shah S/o Mastan Shah	SSC	BCS Mewa Khan Qadam Khel
7.	Khail Gul s/o Zahir Shah	SSC	BCS Wilayat Shah Madu Khel
8.	Miraj Khalid s/o Haji Umar Khan	SSC	BCS Haji Shamshal Abdul Khel
9.	Shahidullah s/o Muhammad Alam	SSC	BCS Haji Shamshal Abdul Khel
10.	Gulab Sher s/o Aqal Meer	SSC	BCS Rahim Shah Mian Khel
11.	Zeenat Khan s/o Zarbat Khan	SSC	BCS Rahim Shah Mian Khel
12.	Hazrat Hussain s/o Sher Hussain	SSC	BCS Haji Sher Hussain Sheriz
13.	Janab Khan s/o Shughli Man	SSC	BCS Haji Sher Hussain Sheriz
14.	Mehboob Khan s/o Zarbab Khan	SSC	BCS Naseem Khan Katya Khel
15.	Muhammad Irfan s/o Zarbab Khan	SSC	BCS Naseem Khan Katya Khel
16.	Sabir Khan s/o Nasir Khan	SSC	BCS Naseer Mastal Khel
17.	Amin Ul Haq s/o Muhd. Ashraf	SSC	BCS Sarwar Khan BZK
18.	Sher Ur Rehman s/o Yousaf Khan	SSC	BCS Sarwar Khan BZK
19.	Zaz Muhammad s/o Jan Muhammad	SSC	BCS Sangin BZK
20.	Muhammad Sadiq s/o Zarbaz Khan	F.Sc	BCS Duran Gul Bara
21.	Suhail Ahmad s/o Zarbaz Khan	SSC	BCS Duran Gul Bara
22.	Muhammad Zaman s/o Hukam Khan	SSC	BCS Ghulam Tora vela Sultan Khel
23.	Muhammad Fayaz s/o Muhd: Firdos	SSC	BCS Ghulam Tora vela Sultan Khel

Note:-

1. The employee shall serve the Govt. as Communal School Teachers from the date of assumption of Charge.
2. They shall devote his whole time to their duties as Communal School Teacher.
3. They shall submit himself to the lawful orders of the Govt. officers.
4. They shall motivate the parents to send their children to school.
5. These posting will not be transferable, however, local teachers preferably trained can be adjusted against regular posts on case to case basis.
6. They shall produce Health and Age certificate from the Agency Surgeon concerned.
7. Their original Education Qualification, date of date of birth and Domicile certificate should be checked before handed over charge of the school/office.
8. They fails to report within 15 days the order will be treated as cancelled.
9. Charge report should be submitted to all concerned.
10. Age should be accorded to the Government rules.

(MR. JANGI KHAN)
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

Endst: No. 3369-3400/

Dated 21/5/2003

Copy of the above is forwarded to the:-

1. The Additional Secretary Governor's Secretariat Govt. of NWFP Peshawar.
2. Director of Education FATA (NWFP) Peshawar.
3. Political Agent Khyber at Peshawar.
4. Agency Accounts Officer Khyber at Peshawar.
5. Asstt: Political Agent Tehsil Bara Khyber Agency.
6. Asstt: Political Agent Tehsil Jamrud Khyber Agency.
7. Asstt: Political Agent Tehsil Landi Kotal Khyber Agency.
8. S.A.P (Coordination) FATA PE&D Department Govt. of NWFP Peshawar.
9. Candidates Concerned.

Sd/-
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

OFFICE OF THE AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD.
APPOINTMENT ORDER.

Consequent upon the recommendation of Political Administration & approval by the Director of Education FATA (NWFP) Peshawar, the following candidates are hereby appointed against the project post of PTC in BPS No.7 for the project period of three years (03) at Boys Communal Schools in inaccessible area of Tirah Khyber Agency against newly created posts with effect from the date of their taking over charge in the school noted against each:-

S#	Name/ Father name	Qualification	Name of School
1.	Jan Wali s/o Said Bad Shah	SSC	BCS Haji Guldad Mishak Khel
2.	Khan Nawaz s/o Khana Khel	SSC	BCS Nik Amal Madu Khel
3.	Baitullah s/o Tamas Khan	SSC	BCS Yahid Ahmad Sher Khan Khel
4.	Muhammad Sadiq s/o Abdul Rehman	SSC	BCS Yahid Ahmad Sher Khan Khel
5.	Noor s/o Mastan Shah	SSC	BCS Mewa Khan Qadam Khel
6.	Amin Shah s/o Mastan Shah	SSC	BCS Mewa Khan Qadam Khel
7.	Khail Gul s/o Zahir Shah	SSC	BCS Wilayat Shah Madu Khel
8.	Miraj Khalid s/o Haji Umar Khan	SSC	BCS Haji Shamshal Abdul Khel
9.	Shahidullah s/o Muhammad Alam	SSC	BCS Haji Shamshal Abdul Khel
10.	Gulab Sher s/o Agal Meer	SSC	BCS Rahim Shah Mian Khel
11.	Zeenat Khan s/o Zarbat Khan	SSC	BCS Rahim Shah Mian Khel
12.	Hazrat Hussain s/o Sher Hussain	SSC	BCS Haji Sher Hussain Sheriz
13.	Janab Khan s/o Shughli Man	SSC	BCS Haji Sher Hussain Sheriz
14.	Mehboob Khan s/o Zarbab Khan	SSC	BCS Naseem Khan Katya Khel
15.	Muhammad Irfan s/o Zarbab Khan	SSC	BCS Naseem Khan Katya Khel
16.	Sabir Khan s/o Nasir Khan	SSC	BCS Naseer Mastal Khel
17.	Amin Ul Haq s/o Muhd. Ashraf	SSC	BCS Sarwar Khan BZK
18.	Sher Ur Rehman s/o Yousaf Khan	SSC	BCS Sarwar Khan BZK
19.	Zaz Muhammad s/o Jun Muhammad	SSC	BCS Sangin BZK
20.	Muhammad Sadiq s/o Zarbaz Khan	F.Sc	BCS Duran Gul Bara
21.	Suhail Ahmad s/o Zarbaz Khan	SSC	BCS Duran Gul Bara
22.	Muhammad Zaman s/o Hukam Khan	SSC	BCS Ghulam Tora yela Sultan Khel
23.	Muhammad Fayaz s/o Muhd. Firdos	SSC	BCS Ghulam Tora yela Sultan Khel

Note:-

1. The employee shall serve the Govt. as Communal School Teachers from the date of assumption of Charge.
2. They shall devote his whole time to their duties as Communal School Teacher.
3. They shall submit himself to the lawful orders of the Govt. officers.
4. They shall motivate the parents to send their children to school.
5. These posting will not be transferable, however, local teachers preferably trained can be adjusted against regular posts on case to case basis.
6. They shall produce Health and Age certificate from the Agency Surgeon concerned.
7. Their original Education Qualification, date of date of birth and Domicile certificate should be checked before handed over charge of the school/office.
8. They fails to report within 15 days the order will be treated as cancelled.
9. Charge report should be submitted to all concerned.
10. Age should be accorded to the Government rules.

(MR. JANGI KHAN)
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

Endst: No. 3369-3400/

Dated 21/5/2003

Copy of the above is forwarded to the:-

1. The Additional Secretary Governor's Secretariat Govt. of NWFP Peshawar.
2. Director of Education FATA (NWFP) Peshawar.
3. Political Agent Khyber at Peshawar.
4. Agency Accounts Officer Khyber at Peshawar.
5. Asstt. Political Agent Tehsil Bara Khyber Agency.
6. Asstt. Political Agent Tehsil Jamrud Khyber Agency.
7. Asstt. Political Agent Tehsil Landi Kotal Khyber Agency.
8. S.A.P. (Co-ordination) FATA PE&D Department Govt. of NWFP Peshawar.
9. Candidates Concerned.

Sd/-
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD.
APPOINTMENT ORDER

In consequence upon the recommendation of Political Administration and approval by Director of Education FATA Peshawar the following candidates are hereby appointed against the Project post of PTC in BPS No.07/PM fixed for the Project period for 03-years at Boys Communal Schools in Landi Kotal/Ban & Jamrud Tehsil Khyber Agency with effect from the date of their taking over charge.

S.No	Name / Father Name	Qual.	Name of School	Remarks
01	Shah Jehan S/O Gul Zamir	SSC	BCS Batoor Killi Aka Khel Bara	w.e.from 1.9.04 after summer vacation
02	Muhammad Karim S/O Khan Karim	SSC	do.	do
03	Arshad Ali S/O Muhammad Afzal	SSC	BCS Mawaz Killi Ghaibi Nekah	w.e.1.8.04 after summer vacation
04	Irfan Ullah S/O Chaman Khan	SSC	BCS Kuki Khel Ziauddin	w.e.from 1.9.04 after summer vacation
05	Nafees Ahmed S/O Said Ahmed	SSC	BCS Dr. Nasrat Tangoo Tirah	w.e.from 1.8.04 after summer vacation
06	Jamshid Khan S/O Arbab Khan	SSC	BCS Saifur Rehman Khato China Tirah	w.e.from 1.8.04 after summer vacation Re-Appointment and terminated Vide No.7846-51 dated 22.12.03
07	Ali Bad Shah S/O Khalil Shah	SSC	BCS Zaman Khan Sre Wela	w.e.from 1.8.04 after summer vacation

NOTE

1. They employees shall serve the Govt. as communal school teachers from the date of assumption of charge.
2. They shall devote their whole time to their duties as communal school teachers.
3. They shall submit themselves to the lawful orders of the Govt. Officers.
4. They shall motivate the parents to send their children to school.
5. These posting will be not be transferable, however local teachers preferably trained can be adjusted against regular Posts on case-to- case basis.
6. They shall produce Health and Age certificate from Agency Surgeon concerned.
7. Their Original Education Qualifications, date of birth and Domicile certificate should be checked before handing over charge of the school.
8. If they fail to report with in 15 days, the order will automatically be treated as cancelled.
9. Charge reports should be submitted to all concerned.
10. They will not be handed to over the charge if they are below 18-years and above 33-years of age.

(DILBAR KHAN)
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD,

Encls: No. 3661-65 Appnt/PTC/BCS Dated 24 / 7 / 2004.

Copy forwarded for information to the:

1. Additional Secretary Government Govt. of NWFP Peshawar.
2. Director of Education FATA NWFP Peshawar.
3. Political Agent Khyber at Peshawar.
4. Agency Accounts officer at Peshawar.
5. Asstt. Political Agent Jamrud Khyber Agency.
6. S.A.P (coordinator) FATA PE&D Department Govt. of NWFP Peshawar.
7. Accountant Local Office.
8. AAEO (Lit) Local office.
9. Candidates concerned.

AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD.

24/7

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OFFICE OF THE AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD
APPOINTMENT ORDER

The following candidates are hereby appointed against the project post of PTC in BPS No.07 for the project period of three years at Boys Communal School Rehmat Gul Killi Aka Khel Tirah in inaccessible area of Tirah Khyber Agency against the vacant PTC post with effect from the date of taking over charge in the school noted against each

S.No	Name/ Father's Name	Qualif:	Name of School	Remarks
01	Gul Amin S/O Angor Kahn	SSC	BCS Rehmat Gul Killi	Against vacant PTC Post
02	Abdul Qayum S/O Rehmat Gul	SSC	BCS Rehmat Gul Killi	Against vacant PTC Post

Note:-

1. The employee shall serve the Govt. as contractual schools teacher from the date of assumption of charge
2. They shall devote their whole time to their duties as communal school teacher.
3. They shall submit himself to the lawful orders of Govt. officers.
4. They shall motivate the parents to send their children to school
5. These posting will not be transferable, however local teachers preferably trained can be adjusted against regular posts on case to case basis.
6. They shall produce Health and Age certificate from the Agency Surgeon concerned.
7. Their Original Education qualification, date of birth and domicile certificate should be checked before handed over charge of the school
8. If they fail to report within 15 days the order will be treated as cancelled.
9. Charge report should be submitted to all concerned
10. Age should be recorded to the Government rules.
11. They will take over charge on 4.3.2006.

(MR. ABDUR RASHID)
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

Endst: No 241-45 Dated 20/12 2005

Copy forwarded to the for information and necessary action to the:-

1. Director of Education FATA (NWFP) Peshawar.
2. Agency Accounts Officer Khyber at Peshawar.
3. AAEO concerned.
4. Candidate concerned

A. Rashid
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

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OFFICE OF THE AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD.
APPOINTMENT ORDER.

Consequent upon the recommendation of Political Administration & approval by the Director of Education FATA (NWFP) Peshawar, the following candidates are hereby appointed against the project post of PTC in BPS No.7 for the project period of three years (03) at Boys Communal Schools in inaccessible area of Tirah Khyber Agency against newly created posts with effect from the date of their taking over charge in the school noted against each:-

S#	Name/ Father name	Qualification	Name of School
1.	Jan Wali s/o Said Bad Shah	SSC	BCS Haji Guldad Mishak Khel
2.	Khan Nawaz s/o Khana Khel	SSC	BCS Nik Amal Madu Khel
3.	Baitullah s/o Tamas Khan	SSC	BCS Yahid Ahmad Sher Khan Khel
4.	Muhammad Sadig s/o Abdul Rehman	SSC	BCS Yahid Ahmad Sher Khan Khel
5.	Noor s/o Mastan Shah	SSC	BCS Mewa Khan Qadam Khel
6.	Amin Shah S/o Mastan Shah	SSC	BCS Mewa Khan Qadam Khel
7.	Khail Gul s/o Zahir Shah	SSC	BCS Wilayat Shah Madu Khel
8.	Miraj Khalid s/o Haji Umar Khan	SSC	BCS Haji Shamshah Abdul Khel
9.	Shahidullah s/o Muhammad Alam	SSC	BCS Haji Shamshah Abdul Khel
10.	Gulab Sher s/o Agal Meer	SSC	BCS Rahim Shah Mian Khel
11.	Zeenat Khan s/o Zarbab Khan	SSC	BCS Rahim Shah Mian Khel
12.	Hazrat Hussain s/o Sher Hussain	SSC	BCS Haji Sher Hussain Sheriz
13.	Janab Khan s/o Shughli Man	SSC	BCS Haji Sher Hussain Sheriz
14.	Mehboob Khan s/o Zarbab Khan	SSC	BCS Naseem Khan Katya Khel
15.	Muhammad Jifan s/o Zarbab Khan	SSC	BCS Naseem Khan Katya Khel
16.	Sabir Khan s/o Nasir Khan	SSC	BCS Naseer Mastal Khel
17.	Amin Ul Haq s/o Muhi. Ashraf	SSC	BCS Sarwar Khan BZK
18.	Sher Ur Rehman s/o Yousaf Khan	SSC	BCS Sarwar Khan BZK
19.	Zaz Muhammad s/o Jan Muhammad	SSC	BCS Sangin BZK
20.	Muhammad Sadig s/o Zarbaz Khan	F.Sc	BCS Duran Gul Bara
21.	Suhail Ahmad s/o Zarbaz Khan	SSC	BCS Duran Gul Bara
22.	Muhammad Zaman s/o Hukam Khan	SSC	BCS Ghulam Fara vela Sultan Khel
23.	Muhammad Fayaz s/o Muhi. Firdos	SSC	BCS Ghulam Fara vela Sultan Khel

Note:-

1. The employee shall serve the Govt. as Communal School Teachers from the date of assumption of Charge.
2. They shall devote his whole time to their duties as Communal School Teacher.
3. They shall submit himself to the lawful orders of the Govt. officers.
4. They shall motivate the parents to send their children to school.
5. These posting will not be transferable, however, local teachers preferably trained can be adjusted against regular posts on case to case basis.
6. They shall produce Health and Age certificate from the Agency Surgeon concerned.
7. Their original Education Qualification, date of date of birth and Domicile certificate should be checked before handed over charge of the school/office.
8. They fails to report within 15 days the order will be treated as cancelled.
9. Charge report should be submitted to all concerned.
10. Age should be accorded to the Government rules.

(MR. JANGI KHAN)
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

Endst: No. 3369-3400/

Dated 21/5/2003

Copy of the above is forwarded to the:-

1. The Additional Secretary Governor's Secretariat Govt. of NWFP Peshawar.
2. Director of Education FATA (NWFP) Peshawar.
3. Political Agent Khyber at Peshawar.
4. Agency Accounts Officer Khyber at Peshawar.
5. Asstt. Political Agent Tehsil Bara Khyber Agency.
6. Asstt. Political Agent Tehsil Jamrud Khyber Agency.
7. Asstt. Political Agent Tehsil Landi Kotal Khyber Agency.
8. S. A. P. (Coordination) FATA PE&D Department Govt. of NWFP Peshawar.
9. Candidates Concerned.

Sd/-

AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

OFFICE OF THE AGENCY EDUCATION OFFICE N.W.AGENCY.

APPOINTMENT.

Consequent upon the approval of the Political Authority Miranshah Mr. Javed Iqbal S/O Mir Akbar Baka Khel Shawal N.A Agency is hereby appointed against vacant PTC post at M.C.S Gul Rasan Khan Shoi Khel Shawal Tehsil Daata KHel N.W Agency purely on contract basis and specify Rs. 2220/- PM fixed plus usual allowance as admissible to his under the rules for the project period.

TERMS AND CONDITIONS:

1. His appointment is being made purely on CONTRACT basis liable to termination at any time without any notice if resign from his post he should give one month prior notice or forfeit one month of pay in lieu thereof
2. He should not be handed over a charge of the same post if he below 18 year or above 33 year age.
3. He should produce his Health and age certificate from the Medical Supdt, Agency HQ Hospital Miranshah.
4. His original qualification date of birth and domicile certificate should be checked and photo copy be placed of the record, before handed over charge of the same post.
5. If he fail to resume his charge with in 15 days the order should be treated as cancelled.
6. His academic/professional will be refered to all concerned/Board/University (By depositing) usual fee charge for necessary verification till the receipt his certificate, the salary will no tbe drawn.
7. TA/DA is not allowed.
8. He should produce his NIC to the AAEO Circle concerned.
9. Charge report should be sumiteted to all concerned.
10. The service of the above candidate will be terminated if he is found absent un-authorizedly.
11. He will not be entitled for annual increament.

(Mirza Ali Khan)
Agency Education Officer,
North Waziristan Agency

Endst: No: 70017-22/AEO/NWA/PTC/Appt: dated 19-6-03

Copy to the above is forwarded to :

1. The Political Agent North Waziristan Agency Miranshah
2. The Agency Accounts Officer NWA at Miranshah
3. AAEO Circle concerned.
4. Candidate concerned
5. Accountant local office.

Agency Education Officer,
North Waziristan Agency.

OFFICE OF THE AGENCY EDUCATION OFFICER N.W.AGENCY.**APPOINTMENT.**

Consequent upon the approval of Political Authority (NWA Miranshah the following local candidate are hereby appointed against vacant PTC POST in Male Communal school in newly opened area of shawal noted against their purely on contract basis and post specify at Rs. 2220/PM fixed plus usual allowance as admissible to them under the rule for the project period with effect from the date of taking over charge.

<u>S.No: Name of candidats/father Name</u>	<u>Where appointed.</u>
1. Abdul Mutlib Khan S/O Sakhi Mar Jan Wazir Jani Khel Shawal N.W. Agency	MCS Gul Janat S/O Samani Jani Khel Shawal N.A. Agency
2. Janat Mir Khan S/O Rab Nawaz Khan Wazir Jani Khel Shawal N.W. Agency	MCS Ayub Khan S/O Dian Gu Bora Saidgi Shawal (NWA)
3. Mohammad Kausar S/O Jehandad Wazir FR Bannu.	MCS Bakhtair S/ Shakir Jan Saidgi Shawal.

TERMS AND CONDITIONS.

- Their appointment is being made subject to the following terms and conditions.
1. Their appointment are being made purely on contract basis liable to termination at any time without any notice, if wish to resign from their post they should give one month's prior notice or forfeit on month's pay in lieu thereof.
 2. They should not be handed over charge of the same post if they below 18 year or above 33 years of age.
 3. They should produce their Health and Age certificate from the M/S Agency H/Q Hospital Miranshah.
 4. Their original qualification date of Birth and domicile should be checked and photo copies be placed on recorded before handing over charge of the same post.
 5. If they failed to assume their charge with in 15 days, their order should be treated as cancelled.
 6. Their documents will be referred to the concerned board/University for verification. Their pay will not be drawn till their verification of the certificates are not received from the concerned board
 7. They should produce their NTC to the AAEO circle concerned.
 8. After completion of all codel formalities charge reports should be submitted to all concerned in duplicate.
 9. They will be Governed by the service rules in force.
 10. The services of the above candidates will be terminated if they found absent on-authorizedly.
 11. They will not be transferred under any circumstances.
 12. They should take over charge after summer vacation i.e. 1.8.03

(MIR ZALI KHAN)
AGENCY EDUCATION OFFICER
Dated 5/7/03

Endst: No 7074-79 /PTC/ AEO/Shawal
Copy to the :

1. The Director of Education (FATA) NWFP Peshawar.
2. The Political Agent North Waziristan Agency Miranshah
3. The A.P.O Miranshah
4. The Agency Accounts Officer NWA at Miranshah.
5. AAEO Circle concerned.
6. Headteachers concerned.
7. Accountant local offices candidates concerned.

EDUCATION OFFICE OF THE AGENCY EDUCATION OF OFFICER FR DI KHAN TANK AT DI KHAN

APPOINTMENTS

Consequent upon the selection of candidates for the post of PTC Female by the Departmental

Selection committee the following Female candidate of FR TANK are hereby appointed is PTC (untrained) for the project period (condition of policy) in BPS -7 (Fixed pay) plus usual allowances as admissible under the rules, with effect from the date of their

Taking over charge in the school noted against their names.

Sr#	Name	Father's Name	Name of school	Remarks
1	Saima khan	Doctor Khan	GFCS Said Alam kor	-Do-
2	Nabila Nosheen	Qasim Khan	GFCS Gul Zaman kor	-Do-
3	Nadia Umar	Umar Khan	GFCS Toorkistan kor	-Do-
4	Naseema	Dilawar Khan	GFCS Surat Khan kor	-Do-
5	Gul Nasreen	Abdul Hameed	GFCS Gul Hassan Shah kor	-Do-
6	Basro	Muhammad Zan	GFCS Gul Marjan	-Do-

TERM & CONDITIONS:

- i) Charge reports should be submitted to all concerned in department.
- ii) The appointments of candidates are being made on project period and are liable to termination at any time without assigning any reason . In case they wish to resip their posts they will have to give one months period notice OR forfeit or month pay lieu therof.
- iii) The original academic / professional certificate domicile certificate NIC, and Date of birth certificates should be checked before his taking over charge after taking over charge to their monthly salaries will be not drawn till verification of their documents from institutions concerned .
- iv) TA / DA etc are not allowed.
- v) They should have to produce health & Age certificate from the medical superintendent district head quarter hospital concerned .
- vi) They should not handing over charge of their post if they are below 18 years and above 40 years .
- vii) The pay scale & service rule would be subjected to the revision in accordance with the passed by N.W.F.P time to time.
- viii) The concerned authorities should got verified their verification or roll of lecture antecedent and the same might be kept on office record.
- ix) They will not apply for transfer to settled a da completion tenure in TA.
- x) If they fill to report their arrivale taking over charge within 15 days there appointment order will be usured as cancelled
- xi) Their services will be terminated if they found absent from Govt duties for 15 days un authorisedly.

Endst: No 1098-1109 /Dated

copy of the bove is forwarded to

1. The District account officer , D.I KHAN
2. The Assistant Agency Education officer(I cm,) FR TANK.
3. The pay clerk local office.
4. Record clerk local office.
5. The candidated concerned .

(Muhammad Din Khan Mahsood)

Agency Education Officer,
FR,D.I KHAN/Tank at DI KHAN

DI KHAN

The 13 /04 /2007

Agency Education Officer

FR.DI KHAN / Tank

OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY

APPOINTMENT ORDER

Consequent upon the approval of Departmental selection committee the following local male PTC candidate are here by appointed against PTC posts and BPS-7 (2555-140-6755) plus usual allowances as admissible under the rules mentioned against each, purely on contract basis for two years with effect from their taking over charge against vacant posts noted against each.

SNO	Serial NO	Name of Candidate	Father/Husband Name	BPS	Place of posting	Remarks
Baka Khel Tribble						
1	1	Niaz Mohammad	Gul Raees	7	MCS Metar Khan	vacant
2	2	Mohammad Aslam	Gul Rahim Khan	7	MCS Attiq ur rahman	
Jani Khel Tribble						
3	3	Mohammad Isamail	Mohammad Zaman	7	MCS Barkat Khan	vacant
4	4	Mohammad Awaz	Asal Mir	7	MCS Gul Rehan	vacant
Kabul Khel						
5	5	Noor Hayat	Nawab Khan	7	MCS Laleer	vacant
Mada Khel Tribble						
6	6	Hamayoon Khan	Bad shah mir	7	MCS Guloop	vacant
Zoi Saidgi Tribe						
7	7	Attaullah	Khangai	7	MCS Mirzal	vacant

TERMS AND CONDITIONS:

1. Their appointment are purely made on contract basis and liable to termination at any time without any notice, if wish to resign from their posts they should give one month prior notice or forfeit one month of pay in lieu thereof .
2. They should not be handed over charge of the same post if are below 18 years of above 33 years age.
3. They should bring their original domicile certificates for verification from political Agent Office , NWA if found bogus their appointment orders will be considered as cancelled.
4. They should produce their health and age certificate form the Medical superintendent Agency Head Quarter Hospital Miranshah.
5. Their original Qualifications , date of birth and domicile certificate should be checked and photo copy be placed on the record , before handed over charge of the same posts.
6. If they fail to resume their charge with in 15 days the order should be treated as cancelled.
7. Their academic / Professional Certificates will be referred to all concerned boards/ Universities (by depositing usual fee charges) , for necessary verification till the receipt of their certificates , the salary will not be drawn.
8. TA /DA is not allowed.
9. They should produce their NIC to the AAEO circle concerned .
10. Charge report should be submitted in duplicate to all concerned.
11. They will be terminated if they found absent two days continuously from the date of taking over charge.
12. They should effect after winter vacations i.e with effect from 1/3/2006 except. S.No.6.

Endst.No 2300-15 Dated 21-12-05

Agency Education Officer

Copy to.

North Waziristan Agency

1. The Director of education FATA Governor's Secretariate Peshawar.
2. The Political Agent North Waziristan Agency, Miranshah.
3. The Assistant Political officer , North Waziristan Agency, Miranshah.
4. The Agency account officer NWA , Miranshah.
5. AAEO circle concerned .
6. Accountant local office
7. Head Teacher concerned
8. Candidate concerned.

OFFICE OF THE AGENCY EDUCATION OFFICERS KURRAM AGENCY PARACHINAR**APPOINTMENT**

Consequent upon the recommendation/approval by the Assistant Political Agent Kurram Agency, the appointment of the following PTC Male/Female Teachers is hereby ordered in B.P.S No 7 purely on contract basis plus usual allowance as admissible under the rules in the communal/Community schools noted against their names with effect from the date of their taking over charge;

S.No	Name of Teacher	Father' Name	School where appointed
1	Tahir Gul	Akhtar Gul	Community School Mela Watizai against vacant PTC Post.
2	Nizamud Din	Momin Khan	Community School Gardaghuni C.K against the vacant post.
3	Daulat Khan	Bahadar Khan	Community School Khakak Khani Khel C.K against vacant post
4	Shah Khalid	Mir Baz Khan	Community School Khakak Khani Khel C.K against vacant post
5	Rehmat Janan	Usman Khan	Community School Gardaguni C.K against vacant PTC Post.
6	Mohammad Tariq	Miram Jan	Community School Mela Watizai C.K against vacant PTC post
7	Shafiu Rehman	Mir Alam Khan	Community School Sareebi C.K against vacant post
8	Multan Aurang	Gul Ahmad	Community School sareebi C.K against vacant PTC post.

Note:

1. They are directed to produce their Medical certificate from the Medical supdt A.H.Q Hospital Parachinar.
2. Their age be between 18-40 years
3. Their appointment is purely made an temporary basis and liable to termination at any time without assigning any notice, in case they wants to resign their post, they will have to give one month prior notice, or forfeit one month pay in lieu thereof.
4. Charge repeat should be submitted to this office.
5. They shall submit their selves to the lawfull order of the Govt in relation to their duties.
6. They shall carry such administrative and teaching functions
7. These posts are not transferrable.
8. They shall motivate the parents to send their children to schools.

Agency Education Officer
Kurram Agency Parachinar

Endst No 901-11 Dated 1/4/2004

Copy forwarded to the ;

1. Asstt Political Agent Central Kurram Agency
2. Asstt Agency Education Officer C.K.
3. Accountant Local Office
4. Teacher concerned.
5. Office file.

OFFICE OF THE AGENCY EDUCATION OFFICER KURRAM AGENCY PARACHINAR**APPOINTMENT**

Consequent upon the recommendation/approval by the Assitant Political Agent Central Kurram, the appointment of the following PTC Male/Female teachers is hereby ordered in B.P.S No. 7 purely on contract basis plus usual allowance as admisible under the rules in the communal/community schpol noted against their names with effect from the date of their taking over charge:

S.No	Name of Teacher	Father Name	School Where appointed
1.	Nazish Begum	Mohammad Shah	Girls Community School Zangi C.K Against vacant PTC Post
2.	Mohammad	Sultan Jan	Girls Community school Khazina C.K against vacant PTC Post
3.	Riffat Naz	Mir Zaman	Girls Communal school kemal Baza C.K against vacant Post
4.	Salma Jehan Raza	Jehan Raz	Girls Community School Ado Alisherzai against vacant Post
5.	Safia Bibi	Mohammad Nabi	Girls Community School Alisherzai against vacant Post
6.	Memoona	Khair Nawaz	Girls Community School Tanerak CK against vacant Post
7.	Naheed	Khair Nawaz	Girls Community School Tanorak against vacant Post
8.	Shahida Israr	Israr Hussain	Girls Community School Gawdar against vacant Post
9.	Shazia Bibi	Lal Wazir	Girls Community School Gawdar against vacant Post
10.	M. Shafiq Khan	Shundi Gui	Girls Community School Dand Ghundakai Girls Community School Gawdar against vacant Post
11.	Hamid Gul	Mew Gul	Girls Community School Girls Community School Gawdar against vacant Post
12.	Sumaira Taj	Nawshad Khan	Girls Community School Koda Haji Khel Girls Community School Gawdar against vacant Post
13.	Seema Gul	Islam Gul	Girls Community School Manza kali Shamkani CK against vacant post
14.	Zainab Bibi	Iqbal Khan	Girls Community School Manza Kali shamkani CK against vacant post
15.	Hidayat Ullah	Hifzullah	Girls Community School Ghojali CK against vacant post
16.	Noor Marjan	Gul Marjan	Boys Community school Ghojali CK against vacant post
17.	Sadiq Shah	Faqir Shah	Boys Community School Bara CK against vacant
18.	Saeeda Munir	M. Munir Khan	Girls Community School Ghar Khel CK against vacant post
19.	Shahida Bibi	Mohammad Nabi	Girls Community School Ghar Khel CK against vacant post

Agents


B

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15-11-10

FAX NO. :5200467

16 Nov. 2010 09:41AM P1



FATA SECRETARIAT
 DIRECTORATE OF EDUCATION
 KHAYAB KHAN ROAD, PESHAWAR, PAKISTAN
 PHONE: 091-9210144, 922-099-9210744
 No. _____
 Date Recd: 15/11/2010

To: All the Agency Education Officers
 in FATA.

Subject: Closure of Non functional Community Schools in FATA

Memo: The Community Schools in some areas i.e Bara Tehsil of Khyber Agency, Baizai Tehsil in Mohmand Agency, Shawal Area of NWA, Mahsood Area of SWA, some pockets in Bajaur and Orakzai Agencies, and FR Kohat/Peshawar were closed and teachers of these closed Community Schools get their salaries at homes without performing their duties, which is a huge burden on Govt exchequer and development budget. It has therefore been decided by the Competent Authority to close the Community Schools and terminate the services of Community Schools teacher/class IV working in these schools with one month notice under intimation to this office.

I am therefore directed to request you to immediately issue notices to teaching/non teaching staff of the non functional Community Schools in the closed areas on OR before 30.11.2010 for termination of their services w.e.f. 31.12.2010 and report compliance to this office.

Dy: Director (P&M)

Encl: No. 8109-27 /

- Copy to :-
1. All Political Agents in FATA.
 2. DCO Peshawar, Kohat, Lakki, Bannu, Tank, D.I.Khan
 3. PS to Additional Chief Secretary FATA
 4. PS to Secretary A&C FATA
 5. PS to Secretary Finance FATA
 6. PS to Secretary P&D FATA
 7. PA to Director Education, FATA.

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Handwritten signature

Dy: Director (P&M)

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21-12-11

FATA SECRETARIAT
DIRECTORATE OF EDUCATION
WARSAK ROAD PESHAWAR, PAKISTAN
PHONE: 091-9210166 FAX 091-9210216

Subject: Regularization of Services of Community School Teachers on the Recommendations of the Standing Committee of SAFRON held on 21st December, 2011 in Committee Room No.7 of Parliament House, Islamabad

- As per S.No. 10 of the recommendations of the Standing Committee of SAFRON held on 21st December, 2011 at Parliament House Islamabad (F/A) FATA Secretariat should regularize the services of Community School teachers including their previous services & graded salaries as per previous practice without further delay.
2. Keeping in view the recommendations of the Standing Committee, it is proposed that the Directorate may be allowed to process SNEs for creation of posts on regular side for all the community schools in FATA. After creation of posts on current side, a summary will be moved for approval of the Governor Khyber Pakhtunkhwa for relaxation in recruitment rules and regularization of the community school teachers against the newly created posts.
 3. It is also proposed that all the Agency Education Officers in FATA will be directed to process PC-1s by including graded pay for the teaching / non-teaching staff of community school teachers instead of package salary as per decision of the Standing Committee.
 4. The proposals contained in Para-2-3/N above are submitted for approval, please.


Secretary A&C, FATA


Director Education, FATA
16/11/11

Secretary P&D

Secretary Finance

A.C.S, FATA



36

26-4-12



FATA SECRETARIAT
SOCIAL SECTORS DEPARTMENT
WARSAK ROAD PESHAWAR, PAKISTAN

No.

Date Pesh: the 26 / 4 / 2012

To

The Political Agent
Khyber Agency

Subject:

VERIFICATION OF COMMUNITY SCHOOLS & TEACHERS

You must be aware of the fact that out of 956 community schools throughout FATA closed down in December, 2010, 742 were reopened subsequently. The teachers of these community schools are now pressing hard for regularization. The National Assembly/Senate Standing Committee on State and Frontier Regions during its meeting held on 20.4.2012 in FATA Secretariat strongly recommended the regularization of their services.

In order to proceed further, the competent Authority has desired that the Additional Political Agent/Assistant Political Agent should visit all the community schools personally and verify their status, presence of teachers and enrolment figures. The community schools located out of territorial limits of Agencies/FRs should also be pointed out.

This exercise should be completed by 30th April, 2012, positively. List of community schools is enclosed.

This matter should be considered as Most Urgent.

Secretary
Social Sectors Deptt:

Endst: No. 2836-37 /

Copy to the:-

1. PS to Addl: Chief Secretary, FATA.
2. Director Education FATA.

Ali Aslam
Secretary
Social Sector Deptt:

Adi
[Signature]



FATA SECRETARIAT
(SOCIAL SECTORS DEPARTMENT)

SUMMARY FOR GOVERNOR, KHYBER PAKHTUNKHWA

Subject: RECRUITMENT OF COMMUNITY SCHOOL TEACHERS
AGAINST REGULAR POSTS IN FATA

In order to raise literacy level in FATA and make the education available at the doorstep, the project of opening community schools was launched under FATA Annual Developmental Program in 1998. During 1998-2010, 956 Community Schools were opened throughout FATA wherein 1912 teachers (02 per school) were appointed on contract basis.

2. After receiving reports about the non-functional community schools in FATA, the community schools project was closed and the services of teaching/non-teaching staff working in these schools were terminated with effect from 01.01.2011.

3. However, on the persistent demand of Teachers Associations and local leaders, the FATA Secretariat constituted scrutiny committees under the chairmanship of Political Agents/Additional Political Agents in each Agency/FR to verify the status of closed community schools in FATA and to recommend reopening of only functional community schools. A scheme at each Agency/FR level was included in ADP 2011-12. Based on the recommendation of prescribed committees, 742 community schools were reopened throughout FATA, and teachers working in these functional community schools were reappointed on contract basis (Agency wise list of reopened functional community schools is attached at F/A).

4. It is worth mentioning that the community school teachers in FATA have rendered more than 10 years service on contract basis and have lodged repeated appeals and protests mentioned in the Newspapers for regularization of their services (F/B).

5. In addition, the National Assembly / Senate Standing Committees for States and Frontier Regions have also recommended the regularization of the services of community school teachers in their meetings held 21.12.2011 and 9.3.2012 in Parliament House, Islamabad (F/C & F/D).

[Handwritten Signature]



SUMMARY FOR GOVERNOR, KHYBER PAKHTUNKHWA

6. The total working strength of community school teachers in FATA is 1432 (846 female + 586 male) as per Agency/Gender wise break up given at F/E. 15 of them are untrained and not qualified for regular posts vide F/F. Similarly, 259 female teachers are non-local and can only be considered for appointment against regular posts after adjustment of local qualified females F/G. Under the directions of ACS, FATA, the Additional Political Agents have been directed to reverify the existence of the Community Schools, presence of teachers and enrolment of students. These verification reports will be received in a few days and the lists of schools and teachers will be updated/corrected accordingly.
7. There are 303 existing vacant PTC (BS-7) posts in FATA. SNE for creation of 542 PTC posts has been sent to SAFRON Division, Islamabad while that of 192 posts is under process with Finance Department, FATA Secretariat as per details given at F/H which are expected in the near future.
8. A similar issue of adjustment of community school teachers against regular PTC posts had been resolved in the year 2007 by moving a summary for approval of the Governor with the proposal to adjust those community school teachers against regular posts who had been selected on merit and possessed the prescribed professional and academic qualification with more than 03 years service at their credit. The services of those who did not possess the prescribed qualification and experience for PTC posts were dispensed with (F/I). The proposal was very kindly approved by the Governor and instructions issued to all Agency Education Officers accordingly (F/J).
9. Keeping in view their long teaching experience and services rendered for the promotion of literacy in FATA, it is proposed that the community school teachers, who qualify to be posted against the PTC (BS-7), may be considered for appointment against regular posts in phased manner purely on merit basis as per existing recruitment criteria but in relaxation of upper age limit. The available 303 regular vacant posts in the newly constructed Primary/Middle schools in FATA will be filled up from amongst the community school teachers and no fresh candidates considered for recruitment till all the community school teachers are absorbed against regular posts in FATA. The 259 non-local teachers will be considered for appointment after adjustment of local qualified teachers. The services of unqualified teachers shall be dispensed with. This entails that the community schools would be closed down & teachers would shift to constructed schools, not necessarily in the same location. The respective community schools students would be shifted to nearby regular schools. No further recruitment of community school teachers will be made.

FATA SECRETARIAT
(SOCIAL SECTORS DEPARTMENT)



SUMMARY FOR GOVERNOR, KHYBER PAKHTUNKHWA

10. The proposal contained in Para DD/N is submitted for approval of the Governor, Khyber Pakhtunkhwa, please.

M. Usman 30/4/2012
Secretary Social Sectors, FATA

Secretary Finance, FATA (on leave)

11. Finance Department, FATA, submitted para- 9/N

M. Usman
DEPUTY SECRETARY
Finance Department
Secretariat

Addl: Chief Secretary, FATA

12. Para - 9/N is submitted for approval.

M. Usman
12/05/2012
Additional Chief Secretary
FATA Secretariat

Governor, Khyber Pakhtunkhwa

13. Para 9 approved.

Sana
Governor
Khyber Pakhtunkhwa

ACS (F)

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ASST



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11-5-12

FATA SECRETARIAT
Social Sectors Department
Warsak Road Peshawar

Notification

No. SO(E)/SSD/CSTR/99-108/ The Governor Khyber Pakhtunkhwa in his capacity as the Competent Authority has been pleased to approve the re-appointment of Community School Teachers who qualify to be posted against the regular posts of PST (BS-7) in phased manner at the respective Agencies & FRs, purely on merit basis in accordance with the existing recruitment criteria but in relaxation of upper age limit with immediate effect as specified below.

1. The available regular vacant PST (BS-7) posts in the Primary/Middle Schools in FATA will be filled up from amongst the Community School Teachers and no fresh candidate considered for recruitment till all the eligible Community School Teachers are absorbed against regular posts in their respective Agencies/FRs.
2. The non-local eligible Community School Teachers shall be considered for re-appointment against the regular vacant posts of PST (BS-7) after adjustment of local qualified teachers.
3. The services of the un-qualified teachers shall be dispensed with.
4. The Community Schools whose teachers are appointed and shifted to other schools against regular posts, would be closed down.
5. The respective Community Schools students would be shifted to nearby regular schools and no further recruitment of Community School teachers will be made.

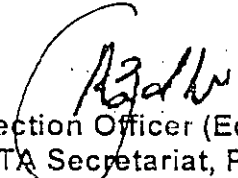
Secretary
Social Sectors Department,
FATA Secretariat, Peshawar

Endst No. Even Dated Peshawar the 11/05/2012

Copy forwarded to the:-

1. Secretary to Governor, Khyber Pakhtunkhwa Peshawar.
2. Addl: Accountant General (PR) Sub Office Peshawar.
3. Director Education FATA, Peshawar.
4. All Political Agents in FATA.
5. DCO Peshawar, Kohat, Bannu, Lakki, D.I.Khan & Tank.
6. Agency/ District Accounts Officers concerned
7. All the Agency Education Officer in FATA
8. PS to Additional Chief Secretary FATA Peshawar.
9. PS to Secretary Social Sectors Department, FATA Secretariat, Peshawar.
10. PS to Secretary P&D, FATA Secretariat, Peshawar.

A. S. S.


Section Officer (Edu) SSD
FATA Secretariat, Peshawar

F 21

29-10-15



33

FATA SECRETARIAT
DIRECTORATE OF EDUCATION
WARSAK ROAD PESHAWAR, PAKISTAN
PHONE 091-9210166 FAX 091-9210216
NO. _____ DATED 29/10/2015

Notification

Consequent upon approval of the Competent Authority the adjustment of Community School Teachers who qualify to be posted against the regular posts of PST (BPS-7) is allowed against regular vacant PST posts purely on merit basis in accordance with the existing approved policy regarding re-appointment of Community School Teachers with immediate effect.

Secretary Social Sectors FATA

Endst: No. 2085-90

Copy forwarded for information to the:-

1. PS to Additional Chief Secretary FATA
2. PS to Secretary SSD FATA.
3. PS to Secretary AI&C FATA.
4. Agency Education Officers in FATA.
5. Agency Account Officers in FATA.
6. PLA to Director Education FATA

Addl: Director (P&M)

ADAMS
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42

OFFICE OF THE AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD.SERVICES REGULARIZATION /ADJUSTMENT ORDER

Consequent upon Notification No. SO (E)/SSD/CSTR-99-108/ dated 11/5/2012 issued by Secretary Social Sector Department FATA Secretariat Peshawar and subsequent approval received from Directorate of Education FATA vide No.2085-90 dated 29/10/2015 the Services of the following Local (Male) Communal School Teachers of Tehsil Bara are hereby Regularized/Adjusted against regular vacant PST posts, in the Schools noted against their names from, Tehsil-Wise merit list, purely on temporary basis in BPS-07 (7490-415-19940) plus usual allowances as admissible under the rules with immediate effect in the interest of public service.

S N	Name	Father Name	Name of Community School	Posting at Regular School	Remarks
1	Munawar Khan	Khan Afzal	BCS Mughal Jan Tora Wala Ziouddin	GMS Toot Dhand BQK Bara	Vacant
2	Anzar Gul	Zar Din	BCS Khushal Khan BQK	GMS Zawa Akak Khel Bara	Vacant

TERMS/CONDITIONS.

- 1 The appointments of the candidates are made purely on temporary basis.
- 2 They will not be entitled to get pension gratuity benefits, however G.P.Fund will be deducted as per rules.
- 3 Charge report should be submitted to all concerned.
- 4 All kinds of documents would be verified from the concerned Boards/University before the drawal of their salaries.
- 5 Health and Age certificate should be produced to this office to be obtained from the Agency Surgeon Khyber Agency.
- 6 Their age should be according to the Govt. policy.
- 7 If they failed to report their arrival within 15-days, of the issuance of this Order, their appointment order will be automatically considered as cancelled.

Gd
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

Endst:No. 560-661 Community

Dated 07/01/2016

Copy of the above is forwarded to the: -

- 1 Director Education (FATA) at Peshawar.
- 2 Political Agent Khyber Agency at Peshawar.
- 3 Agency Accounts Officer Khyber Agency at Jamrud.
- 4 AAEO (Male) concerned.
- 5 Superintendent Local Office
- 6 Accountant/Pay Clerk concerned.
- 7 Official concerned.

AG
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

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43

OFFICE OF THE AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD
SERVICES REGULARIZATION /ADJUSTMENT ORDER

Consequent upon Notification No SO (E/SSD/CSTR-99-108/dated 11/05/2012 issued by Secretary Social Sector Department FATA Secretariat Peshawar and subsequent approval received from Directorate of Education fata VIDE No. 2085-90 dated 29/10/2015 the Services of the following Local (Male) Communal School Teachers of Tehsil Jamrud are hereby Regularized/Adjusted against regular vacant Post in the Schools noted against their names from Tehsil-wise merit list, purely on temporary basis in BPS-07 (7490-415-19940) plus usual allowances as admissible under the rules with immediate effect in the interest of public service.

S.N	Name	Father Name	Name of Community School	Posting at Regular School	Remark
1	Sarfaraz	Anwar Khan	BCS Waris Khan Kachkool Tirah	GPS Jawar Mena Mullagori	Vacant
2	Sadiqullah	Sudha Gul	BCS Khan Afzal Bakhti Mela Tirah	GPS Zardad Killi Jamrud	Vacant
3	Sadiq Ahmad	Sher Jan	BCS.Yousaf Mado Khel Spori Tirah	GPS Toor Dara Tirah	Vacant

TERMS/CONDITIONS:

1. The appointments of the candidate are made purely on temporary basis.
2. They will not be entitled to get pension gratuity benefits however GPI and will be _____ per rules.
3. Change report should be submitted to all concerned
4. All kinds of documents would be verified from the concerned Boards/University before the drawal of their salaries.
5. Health and Age certificates should be produced to this office to be obtained from the Agency Surgeon Khyber Agency.
6. Their age should be according to the Govt Policy.
7. If they failed to report their arrival within 15 days of the issuance of this Order their appointment of order will be automatically considered as cancelled.

AGENCY EDUCATION OFFICER

KHYBER AGENCY AT JAMRUD

Endst No. 596-602 Community


Dated 08/01/2016

Copy to the above is forwarded to the

1. Director Education (FATA) at Peshawar
2. Political Agent Khyber Agency at Peshawar
3. Agency Accounts Officer Khyber Agency at Jamrud
4. AASO (Male) Concerned
5. Superintendent Local Office
6. Accountant/Pay Clerk Concerned
7. Official Concerned

AGENCY _____

KHYBER AGENCY AT JAMRUD

Adopt


44

OFFICE OF THE AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD.

SERVICES REGULARIZATION /ADJUSTMENT ORDER

Consequent upon Notification No. SO (E)/SSD/CSTR-99-108/ dated 11/5/2012 issued by Secretary Social Sector Department FATA Secretariat Peshawar and subsequent approval received from Directorate of Education FATA vide No.2085-90 dated 29/10/2015 the Services of the following Local (Male) Communal School Teachers of Tehsil Bara Jamrud & Landi Kotal are hereby Regularized/Adjusted against regular vacant PST posts, in the Schools noted against their names from, Tehsil-Wise merit list, purely on temporary basis in BPS-07 (7490-415-19940) plus usual allowances as admissible under the rules with immediate effect in the interest of public service.

S.N	Name	Father Name	Name of Community School	Posting at Regular School	Remarks
1	Hazrat Wali	Mian Jan	BCS Haji Masood BQK Tirah	GPS Habib Shah Killi Chirlaga	Vacant
2	Irfan Ullah	Chaman Khan	BCS Kuki Khel Gagai Ziouddin	GPS Zangai BQ Tirah	Vacant
3	Shah Jehan	Gul Zamir	BCS Batoor Bara	GPS Zafar Killi Tirah	Vacant
4	Muhammad Karim	Khan Karim	BCS Batoor Bara	GPS Zafar Killi Tirah	Vacant
5	Noorat Khan	Awal Khan	BCS Allah Baz Toor Dara	GPS Jawara Mena Mutagori	Vacant
6	Amin Shah	Mastan Shah	BCS Khalid Akber Khaist Khula	GPS Chora No.3	Vacant
7	Khial Gul	Zahir Shah	BCS Niqab Shah Toor Sappar	GPS Toor Dara Tirah	Vacant
8	Sabit Khan	Gulmar Jan	BCS Naseem Khan Daman Tirah	GHS Chora Jamrud	Vacant
9	Rehan Khan	Hamayun	BCS Jamroz Killi Paloosai Kass	GHS Loai Shalman LKL	Vacant

TERMS/CONDITIONS.

- 1 The appointments of the candidates are made purely on temporary basis.
- 2 They will not be entitled to get pension gratuity benefits, however G.P.Fund will be deducted as per rules.
- 3 Charge report should be submitted to all concerned.
- 4 All kinds of documents would be verified from the concerned Boards/University before the drawal of their salaries.
- 5 Health and Age certificate should be produced to this office to be obtained from the Agency Surgeon Khyber Agency.
- 6 Their age should be according to the Govt. policy.
- 7 If they failed to report their arrival within 15-days, of the issuance of this Order, their appointment order will be automatically considered as cancelled.

(ATIQU-UR-RAHMAN)
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

Endst:No. 19373-79 / Community

Dated 02 / 11 /2015

Copy of the above is forwarded to the: -

- 1 Director Education (FATA) at Peshawar.
- 2 Political Agent Khyber Agency at Peshawar.
- 3 Agency Accounts Officer Khyber Agency at Jamrud.
- 4 AAEO (Male) concerned.
- 5 Superintendent Local Office
- 6 Accountant/Pay Clerk concerned.
- 7 Official concerned.

AAEO
3

AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

OFFICE OF THE AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD.

45

SERVICES REGULARIZATION /ADJUSTMENT ORDER

Consequent upon Notification No. SO (E)/SSD/CSTR-99-108/ dated 11/5/2012 issued by Secretary Social Sector Department FATA Secretariat Peshawar and subsequent approval received from Directorate of Education FATA vide No.2085-90 dated 29/10/2015 the Services of the following Local (Male) Communal School Teachers of Tehsil Bara Jamrud & Landi Kotal are hereby Regularized/Adjusted against regular vacant PST posts, in the Schools noted against their names from, Tehsil-Wise merit list, purely on temporary basis in BPS-07 (7490-415-19940) plus usual allowances as admissible under the rules with immediate effect in the interest of public service.

S.N	Name	Father Name	Name of Community School	Posting at Regular School	Remarks
1	Hazrat Wali	Mina Jan	BCS Haji Masood BQK Tirah	GPS Habib Shah Killi Chirlaga	Vacant
2	Irfan Ullah	Chaman Khan	BCS Kuki Khel Gagai Ziouddin	GPS Zangai BQ Tirah	Vacant
3	Shah Jehan	Gul Zamir	BCS Batoor Bara	GPS Zafar Killi Tirah	Vacant
4	Muhammad Karim	Khan Karim	BCS Batoor Bara	GPS Zafar Killi Tirah	Vacant
5	Noorat Khan	Awal Khan	BCS Haji Khan Zali Pak Dara	GPS Jawara Mena Mulagori	Vacant
6	Amin Shah ✓	Mastan Shah	BCS Khalid Akber Khaist Khula	GPS Chora No. 3	Vacant
7	Khalid Gul	Zahir Shah	BCS Niqab Shah Toor Sappar	GPS Toor Dara Tirah	Vacant
8	Sabit Khan	Gulmar Jan	BCS Naseem Khan Daman Tirah	GHS Chora Jamrud	Vacant
9	Rehan Khan	Hamayun	BCS Jamroz Killi Paloosai Kass	GHS Loai Shalman LKL	Vacant

TERMS/CONDITIONS.

- 1 The appointments of the candidates are made purely on temporary basis.
- 2 They will not be entitled to get pension gratuity benefits, however G.P.Fund will be deducted as per rules.
- 3 Charge report should be submitted to all concerned.
- 4 All kinds of documents would be verified from the concerned Boards/University before the drawal of their salaries.
- 5 Health and Age certificate should be produced to this office to be obtained from the Agency Surgeon Khyber Agency.
- 6 Their age should be according to the Govt. policy.
- 7 If they failed to report their arrival within 15-days, of the issuance of this Order, their appointment order will be automatically considered as cancelled.

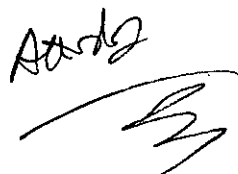
(ATIQU-UR-RAHMAN)
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

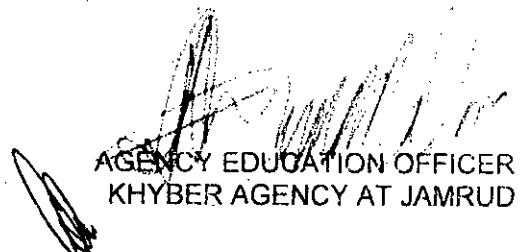
Endst:No. 19373-79 / Community

Dated 02 / 11 /2015

Copy of the above is forwarded to the: -

- 1 Director Education (FATA) at Peshawar.
- 2 Political Agent Khyber Agency at Peshawar.
- 3 Agency Accounts Officer Khyber Agency at Jamrud.
- 4 AAEC (Male) concerned.
- 5 Superintendent Local Office
- 6 Accountant/Pay Clerk concerned.
- 7 Official concerned.




AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

OFFICE OF THE AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD.**SERVICES REGULARIZATION /ADJUSTMENT ORDER**

Consequent upon Notification No. SO (E)/SSD/CSTR-99-108/ dated 11/5/2012 issued by Secretary Social Sector Department FATA Secretariat Peshawar and subsequent approval received from Directorate of Education FATA vide No.2085-90 dated 29/10/2015 the Services of the following Local (Male) Communal School Teachers of Tehsil Bara Jamrud & Landi Kotal are hereby Regularized/Adjusted against regular vacant PST posts, in the Schools noted against their names from, Tehsil-Wise merit list, purely on temporary basis in BPS-07 (7490-415-19940) plus usual allowances as admissible under the rules with immediate effect in the interest of public service.

S.N	Name	Father Name	Name of Community School	Posting at Regular School	Remarks
1	Hazrat Wali	Mina Jan	BCS Haji Masood BQK Tirah	GPS Habib Shah Killi Chirtaga	Vacant
2	Irfan Ullah	Chaman Khan	BCS Kuki Khel Gagai Ziouddin	GPS Zangai BQ Tirah	Vacant
3	Shah Jehan	Gul Zamir	BCS Batoor Bara	GPS Zafar Killi Tirah	Vacant
4	Muhammad Karim	Khan Karim	BCS Batoor Bara	GPS Zafar Killi Tirah	Vacant
5	Noorat Khan	Awal Khan	BCS Haji Khan Zali Pak Dara	GPS Jawara Mena Mulagori	Vacant
6	Amin Shah	Mastan Shah	BCS Khalid Akber Khaist Khula	GPS Chora No.3	Vacant
7	Khial Gul	Zahir Shah	BCS Niqab Shah Toor Sappar	GPS Toor Dara Tirah	Vacant
8	Sabit Khan	Gulmar Jan	BCS Naseem Khan Daman Tirah	GHS Chora Jamrud	Vacant
9	Rehan Khan	Hamayun	BCS Jamroz Killi Palooasai Kass	GHS Loai Shalman LKL	Vacant

TERMS/CONDITIONS.

- The appointments of the candidates are made purely on temporary basis.
- They will not be entitled to get pension gratuity benefits, however G.P.Fund will be deducted as per rules.
- Charge report should be submitted to all concerned.
- All kinds of documents would be verified from the concerned Boards/University before the drawal of their salaries.
- Health and Age certificate should be produced to this office to be obtained from the Agency Surgeon Khyber Agency.
- Their age should be according to the Govt. policy.
- If they failed to report their arrival within 15-days, of the issuance of this Order, their appointment order will be automatically considered as cancelled.

(ATIQU-UR-RAHMAN)
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

Endst:No. 19373-79 / Community

Dated 02 / 11 /2015

Copy of the above is forwarded to the: -

- 1 Director Education (FATA) at Peshawar.
- 2 Political Agent Khyber Agency at Peshawar.
- 3 Agency Accounts Officer Khyber Agency at Jamrud.
- 4 AAEO (Male) concerned.
- 5 Superintendent Local Office
- 6 Accountant/Pay Clerk concerned.
- 7 Official concerned.

AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

47

OF THE AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD.

SERVICES REGULARIZATION /ADJUSTMENT ORDER:

Consequent upon Notification No. SO (E)/SSD/CSTR-99-108/ dated 11/5/2012 issued by Secretary Social Sector Department FATA Secretariat Peshawar and subsequent guidance received from Directorate of Education FATA vide No.10380 dated 02/09/2013, the following Local (Male) Communal School Teachers of Tehsil Jamrud and Bara are hereby Regularized/Adjusted against regular vacant PST posts from Tehsil-Wise merit list purely on temporary basis in BPS-07(7490-415-19940) plus usual allowances as admissible under the rules w.e.f the date of their taking over charge in the schools noted against their names in the interest of public service.

S/No.	Name	Father Name	Name of Tehsil	Name of Community School	Posting at Regular School	Remarks
1.	Ghulab Sher	Aqal Meer	Jamrud	BCS Khaista Gul Sra Wela Tirah	GPS Malak Sardar Mir killi Sher Braj Mullagori	V/Pos
2.	Mohammad Jan	Alla Baz	Jamrud	BCS Yousaf Madu Khel Spori Tirah	GPS Nazar Killi BZK	V/Pos
3.	Syed Ahmad Afridi	Lalmedar	Bara	BCS Pakistan Tora Wela Ziuddin	GMS Shin Kamar Bara.	V/Pos
4.	Khista Noor	Walayat Shah	Bara	BCS Barkat Shah Maskat Tirah	GMPS Hayat Meer Aka Khel Bara.	V/Pos
5.	Abdul Qayum	Rehmat Gul	Bara	BCS Rehmat Khan Shahibeg	GPS Gulab Killi Loi Shalman Khyber Agency.	V/Pos

TERMS/CONDITIONS.

- 1 The appointments of the candidates are made purely on temporary basis & are liable to termination at any time without assigning any reason.
- 2 They will not be entitled to get pension gratuity benefits, however GP/Fund will be deducted as per rules.
- 3 Charge report should be submitted to all concerned.
- 4 All kinds of documents would be verified from the concerned Boards/University before the drawal of their salaries.
- 5 Health and Age certificate should be produced to this office to be obtained from the Agency Surgeon Khyber Agency.
- 6 Their age should be according to the Govt. policy.
- 7 If they failed to report of their arrival within 15-days their appointment order will be automatically considered as cancelled.

(ABDUR RAUF SHAH)
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

Endst.No. 54/C1-7 Communal File

Dated 20/7 /2016

Copy of the above is forwarded to the: -

- 1 Director Education (FATA) at Peshawar.
- 2 Political Agent Khyber Agency at Peshawar.
- 3 Agency Accounts Officer Khyber Agency at Jamrud.
- 4 AAEO (Male) concerned.
- 5 Supematant Local Office
- 6 Accountant/Pay Clerk concerned.
- 7 Officials concerned.

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AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUE

OFFICE OF THE AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD.

SERVICES REGULARIZATION /ADJUSTMENT ORDER:

Consequent upon Notification No. SO (E)/SSD/CSTR-99-108/ dated 11/5/2012 issued by Secretary Social Sector Department FATA Secretariat Peshawar and subsequent guidance received from Directorate of Education FATA vide No.10380 dated 02/09/2013, the following Local (Male) Communal School Teachers of Tehsil Jamrud and Bara are hereby Regularized/Adjusted against regular vacant PST posts from Tehsil-Wise merit list purely on temporary basis in BPS-07(7490-415-19940) plus usual allowances as admissible under the rules w.e.f the date of their taking over charge in the schools noted against their names in the interest of public service.

S/No.	Name	Father Name	Name of Tehsil	Name of Community School	Posting at Regular School	Remarks
1.	Gulab Sher	Agal Meer	Jamrud	BCS Khaista Gul Sra Wela Bich	GPS Malak Sardar Mir killi Sher Braj Mullagon	V/Post
2.	Mohammad Jan	Alla Baz	Jamrud	BCS Yousaf Madu Khel Spori Tirah	GPS Nazar Killi BZK	V/Post
3.	Syed Ahmad Afridi	Lalmadar	Bara	BCS Pakistan Tora Wela Zoddin	GMS Shin Kamar Bara.	V/Post
4.	Khista Noor	Walayat Shah	Bara	BCS Barkat Shah Maskat Tirah	GMPS Hayat Meer Aka Khel Bara.	V/Post
5.	Abdul Qayum	Rehmat Gul	Bara	BCS Rehmat Khan Shahibeg	GPS Gulab Killi Loi Shalman Khyber Agency.	V/Post

TERMS/CONDITIONS.

- 1 The appointments of the candidates are made purely on temporary basis & are liable to termination at any time without assigning any reason.
- 2 They will not be entitled to get pension gratuity benefits, however GP/Fund will be deducted as per rules.
- 3 Charge report should be submitted to all concerned.
- 4 All kinds of documents would be verified from the concerned Boards/University before the drawal of their salaries.
- 5 Health and Age certificate should be produced to this office to be obtained from the Agency Surgeon Khyber Agency.
- 6 Their age should be according to the Govt. policy.
- 7 If they failed to report of their arrival within 15-days their appointment order will be automatically considered as cancelled.

(ABDUR RAUF SHAH)
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

EndstNo 5401-7 Communal File Dated 20/7 2016.

Copy of the above is forwarded to the: -

- 1 Director Education (FATA) at Peshawar.
- 2 Political Agent Khyber Agency at Peshawar.
- 3 Agency Accounts Officer Khyber Agency at Jamrud.
- 4 AAEO (Male) concerned.
- 5 Supernatant Local Office
- 6 Accountant/Pay Clerk concerned.
- 7 Officials concerned.

AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

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49



OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN TRIBAL DISTRICT AT MIRANSHAH

APPOINTMENT ORDER

Consequent upon the Governor KPK Directive vide Notification No: SO(E)/SSD/CSTR/99-108 Dated 5/2012, as well as decision by honourable Peshawar High Court Bannu Bench Bannu announced on 17/05/2016, the wing male Community school PST teachers are hereby re-appointed/regularized against the vacant PST Posts in BPS-12 Rs. 13320-960-42120) plus usual allowances as admissible under the rules with effect from the date of taking charge.

S.No	Name	Father's Name	Merit Score	Place of Posting	Remarks
1	Ubedullah	Niaz Bat Khan	30.35	GPS Khwaja wani Tehsil Datta Khel	Vacant Post
2	Baz Muhammad	Muhammad Azim Khan	29.68	GPS Rai Khan Kot Tehsil Datta Khel	Vacant Post
3	Atta Muhammad	Ghulam Muhammad	28.88	GMS Khair Killa Primary Section	Vacant Post
4	Javid Iqbal	Mir Akbar	28.28	GPS Fatah Khan Kot Razmak	Vacant Post

TERMS & CONDITIONS

Their Re-appointment/Regularization has been made on temporary Basis subject to terms and conditions framed by the Government from time to time. Moreover this re-appointment can be withdrawn & is liable to termination without any notice, if any legal, clerical or other kind of mistake arise therein. If they wish to resign from service, they will be giving one month's prior notice or one month's full pay will be forfeited in lieu thereof.

In case they failed to acquire the prescribed professional/academic qualification within the stipulated time, their re-appointment/Regularization order will stand cancelled automatically.

If they fail to assume their charge within 15-days their re-appointment/regularization order will be considered as cancelled.

Their pay will not be drawn till the verification from the concerned Boards/University/Institutes. Moreover they will be terminated if their certificates/Degrees are found fake/bogus and or tempered with at any stage.

The Re-Appointment/Regularization will be entitled to the benefits as admissible to civil servants.

If the Re-Appointee concealed or submitted wrong information, disciplinary action will be initiated against them.

Charge report should be submitted in duplicate to all concerned.

**AGENCY EDUCATION OFFICER
NORTH WAZIRISTAN**

Distt: No. 4663-72 /Community/PST/ (Male File)/AEO/NWA dated: 12/07/2018

- Honourable Registrar Peshawar High Court Bannu Bench at Bannu.
- The Director Education FATA, Warsak Road Khyber Pakhtunkhwa Peshawar.
- The Deputy Commissioner North Waziristan Tribal District at Miran Shah.
- Agency Accounts Officer (NWA) Miran Shah.
- Principals/Head Masters/Head Teacher Concerned.
- AAEOs Circle Concerned.
- Candidate Concerned.
- Accountant Local office.
- KPO of this Office.

Atta

**AGENCY EDUCATION OFFICER
NORTH WAZIRISTAN**

50



OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY

RE-APPOINTMENT ORDER

Consequent upon the Directive by Governor Khyber Pakhtunkhwa vide Notification No: S.O. (E)/SSD/CSTR/99-108 Dated 11/05/2012, as well as decision by honourable Peshawar High Court Bannu Bench Bannu announced on 17/05/2016, the following male Community school PST teachers are hereby re-appointed/regularized against the vacant PST Posts in BPS-12 @ (Rs. 13320-960-42120) plus usual allowances as admissible under the rules with effect from the date of taking over charge.

S.No	Name	Father's Name	Merit Score	Place of Posting	Remarks
1	Muhamamd Zaman	Hazrat Khan	(45.45)	GPS Jalal Bar Kot Sarobi	Vacant Post
2	Abid Ullah	Mir Kalam Khan	(45.45)	GPS Abdi Khel Khaisoor	Vacant Post
3	Muhamamd Aslam	Gul Rahim Khan	(44.20)	GPS Wali Mat Khan Sheratalla Mirali	Vacant Post
4	Abdul Mutleb	Sakhi Marjan	(43.20)	GPS Surma Jan Ghulam Khan	Vacant Post
5	Noor Zahid	Ghulam Jalil Khan	(42.58)	GPS Dewgar Saidgi Ghulam Khan	Vacant Post
6	Alia Sayab	Akhtar Ali	(35.67)	GPS Surma Jan Ghulam Khan	Vacant Post
7	Shah Wazir	Yaqub Khan	(35.16)	GPS Mirali Camp	Vacant Post further directed to work GPS Zakir Khel till further order.
8	Abdul Ghafoor	Gulshad Khan	(32.93)	GPS Hamid Kot Spinwam	Vacant Post
9	Shah Hakim	Mir Sarwar	(32.32)	GPS Dewgar Saidgi Ghulam Khan	Vacant Post

TERMS & CONDITIONS

- 1- Their Re-appointment/Regularization has been made on temporary Basis subject to terms and conditions framed by the Government from time to time. Moreover this re-appointment can be withdrawn & is liable to termination without any notice, if any legal, clerical or other kind of mistake arise therein. If they wish to resign from service, they will be giving one month's prior notice or one month's full pay will be forfeited in lieu thereof.
- 2- In case they failed to acquire the prescribed professional/academic qualification within the stipulated time, their re-appointment/Regularization order will stand cancelled automatically.
- 3- If they fail to assume their charge within 15-days their re-appointment/regularization order will be considered as cancelled.
- 4- Their pay will not be drawn till the verification from the concerned Boards/University/Institutes. Moreover they will be terminated if their certificates/Degrees are found fake/bogus and or tempered with at any stage.
- 5- The Re-Appointment/Regularization will be entitled to the benefits as admissible to civil servants.
- 6- If the Re-Appointee concealed or submitted wrong information, disciplinary action will be initiated against them.
- 7- Charge report should be submitted in duplicate to all concerned.

Sd/-
AGENCY EDUCATION OFFICER
NORTH WAZIRISTAN AGENCY

Endstt: No. 1866-80/Community/PST/ (Male File)/AEO/NWA dated 15/03/2018

- 1- Honourable Registrar Peshawar High Court Bannu Bench at Bannu.
- 2- The Director Education FATA, Warsak Road Khyber Pakhtunkhwa Peshawar.
- 3- The Political Agent North Waziristan Agency at Miran Shah.
- 4- Agency Accounts Officer (NWA) Miran Shah.
- 5- Principals/Head Masters/Head Teacher Concerned.
- 6- AAEs Circle Concerned.
- 7- Candidate Concerned.
- 8- Accountant Local office.
- 9- KPO of this Office.

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AGENCY EDUCATION OFFICER
NORTH WAZIRISTAN AGENCY

51



OFFICE OF
THE AGENCY EDUCATION OFFICER
FR TANK

NO.....
DATED...../2018

RE-APPOINTMENT/ADJUSTMENT.

Consequent upon the recommendation/ Selection of Departmental Selection Committee in FR Tank, Endst: No. 1130 Dated: 10-05-2018, interview held on 22-03-2018, in the light of Secretary Social Sector Department FATA Secretariat Peshawar Notification No. SO(E/SSD/CSTR/99-108) Dated: 11-05-2012 and approval by Director Education FATA Peshawar, the following PTC Female Community School teachers (Local Female) are hereby re-appointed/ adjusted against regular PTC posts in BPS-12 (13320-960-42120) plus usual allowances as admissible under the rules, at the schools mentioned against their names, with effect from the date of taking over charge.

Sr.NO	Name/Father's Name	Name of School where working	Name of School where Posted	Remarks.
1.	Basroo D/O Muhammad Zaman	FCS Ghazi Mar Jan Kor;	GGPS Zar Payo Kor;	Against Vacant Post

TERMS & CONDITIONS:

- 1) No TA/DA is allowed.
- 2) Charge reports should be submitted to all concerned in duplicates.
- 3) Appointment is subject to the condition, that the certificates/documents must be verified from the concerned authorities by this office any found bogus/fake/forged/tempered certificates will be reported to the law enforcing agency for further action.
- 4) In case they wish to resign their post, they will have to give one month's prior notice OR forfeited one month's pay in lieu thereof.
- 5) They should produce Health & Age Certificate from the Medical Superintendent District Head Quarter Hospital Concerned.
- 6) The pay scale and service rules should be subjected to the revision in accordance with the order to be passed by the Govt. from time to time.
- 7) They should join their post within 15 days of the issuing of this notification, in case of failure, their appointment will be expire automatically and no appeal etc shall be entertained.
- 8) If any technical legal flaw is pointed out, the appointment will stand as cancelled.
- 9) If her documents/certificates found bogus at any stage she will be terminated.
- 10) The order of those candidates who are serving under the competent authority (AEO FR Tank) will take effect after submission of their resignation from such service.

Agency Education Officer,
FR Tank.

dated 06/09/2018.

Endst: No 1727-32
Copy to the :-

1. Director of Education FATA Secretariat Peshawar
2. District Accounts Officer, Tank.
3. AAEO FR, Tank.
4. Pay clerk local office.
5. Record clerk local office.
6. Female Teachers concerned.

Agency Education Officer,
& FR Tank.



52

**OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN
AGENCY**

RE-APPOINTMENT ORDER

Consequent upon the Directive by Governor Khyber Pakhtunkhwa vide Notification No: SO(E)/SSD/CSTR/99-108 Dated 11/05/2012, as well as decision by honourable Peshawar High Court Bannu Bench Bannu announced on 17/05/2016, the following male **Community school PST teachers** are hereby re-appointed/regularized against the vacant **PST Posts in BPS-12 @ (Rs. 13320-960-42120)** plus usual allowances as admissible under the rules with effect from the date of taking over charge.

S.No	Name	Father's Name	Merit Score	Place of Posting	Remarks
1	Muhamamd zaman	Hazrat Khan	(45.45)	GPS Jalal Bat Kot Sarobi	Vacant Post
	Abid Ullah	Mir Kalam Khan	(45.45)	GPS Abdi Khel Khaisoor	Vacant Post
	Muhammad Aslam	Gul Rahim Khan	(44.20)	GPS Wali Mat Khan Sheratalla Mirali	Vacant Post
1	Abdul Mutleb	Sakhi Marjan	(43.20)	GPS Surma Jan Ghulam Khan	Vacant Post
5	Noor Zali	Ghulam Jalil Khan	(42.58)	GPS Dewgar Saidgi Ghulam Khan	Vacant Post
6	Afra Sayab	Akhtar Ali	(35.67)	GPS Surma Jan Ghulam Khan	Vacant Post
7	Shah Wazir	Yaqub Khan	(35.16)	GPS Mirali Camp	Vacant Post further directed to work GPS Zakir Khel till further order.
8	Abdul Ghafoor	Gulabad Khan	(32.93)	GPS Hamid Kot Spinwam	Vacant Post
9	Shah Hakim	Mir Sarwar	(32.32)	GPS Dewgar Saidgi Ghulam Khan	Vacant Post

TERMS & CONDITIONS

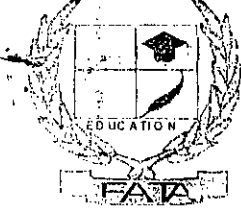
- 1- Their Re-appointment/Regularization has been made on temporary Basis subject to terms and conditions framed by the Government from time to time. Moreover this re-appointment can be withdrawn & is liable to termination without any notice, if any legal, clerical or other kind of mistake arise therein. If they wish to resign from service, they will be giving one month's prior notice or one month's full pay will be forfeited in lieu thereof.
- 2- In case they failed to acquire the prescribed professional/academic qualification within the stipulated time, their re-appointment/Regularization order will stand cancelled automatically.
- 3- If they fail to assume their charge within 15-days their re-appointment/regularization order will be considered as cancelled.
- 4- Their pay will not be drawn till the verification from the concerned Boards/University/Institutes. Moreover they will be terminated if their certificates/Degrees are found fake/bogus and or tempered with at any stage.
- 5- The Re-Appointment/Regularization will be entitled to the benefits as admissible to civil servants.
- 6- If the Re-Appointee concealed or submitted wrong information, disciplinary action will be initiated against them.
- 7- Charge report should be submitted in duplicate to all concerned.

— Sd —
**AGENCY EDUCATION OFFICER
NORTH WAZIRISTAN AGENCY**

Endstr: No. 1866-80/Community/PST/ (Male File)/AEO/NWA dated 15/03/2018

- 1- Honourable Registrar Peshawar High Court Bannu Bench at Bannu.
- 2- The Director Education FATA, Warsak Road Khyber Pakhtunkhwa Peshawar.
- 3- The Political Agent North Waziristan Agency at Miran Shah.
- 4- Agency Accounts Officer (NWA) Miran Shah.
- 5- Principals/Head Masters/Head Teacher Concerned.
- 6- AAEOs Circle Concerned.
- 7- Candidate Concerned.
- 8- Accountant Local office.
- 9- KPO of this Office.

AGENCY EDUCATION OFFICER
NORTH WAZIRISTAN AGENCY



53

**ADD: AGENCY EDUCATION
OFFICE SADDA KURRAM AGENCY**

PHONE. 0926-520674 FAX 0926520674

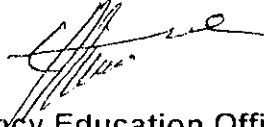
No. _____/Edu:

Dated Sadda:the_15___/___1___/2013

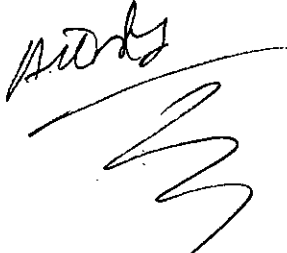
RE INSTATEMENT ORDER

The following community schools teachers (Male, Female) were terminated vide this office Endst no 2597-2616 dated 23-7-2012, Endst no 3064-71 dated 25-9-2012, Endst no 3057-63 dated 25-9-2012, and Endst no 3135- dated 28-9-2012 with the instruction of Secretary SSD notification no So(E)/SSD/CSTR/99-108 dated 11-5-2012 para no (3) and DE FATA memo no 8964-76 dated 28-6-2012 due to having not professional qualification. Now they are re instated with the instruction of DE FATA vide his Endst no 3420-31 dated Pesh: the 3-1-2013.

S#	Name of Female Teacher	Re Adjusted School	S#	Name of Male Teacher	Re Adjusted School
1	Gulnar Begum	GGPS Jawdara CK	1	Zaheeb Rehman	MCS Khakak CK
2	Shakeela Khattak	FCS Mehboob Ali Sadda LK	2	Muhammad Ayaz	do
3	Uzma Akbar	do	3	Muhammad Zubeer	MCS Mela CK
4	Zainab Bibi	FCS Char Khel LK	4	Memullah	do
5	Yasmeen Bibi	FCS Sham Kanri CK	5	Laiq Khan	MCS Mandara CK
6	Fatima	Do	6	Sardar Khan	Do
7	Ghausia Afzal	FCS Koda CK	7	Sunat Gul	MCS Zawka CK
8	Fazeelat	FCS Koda	8	Suliman	Do
9	Muntaha	FCS Saraghorga LK	9	Nabi Rehman	MCS Dand CK
			10	Rashid Khan	MCS Dand
			11	Habib Khan	GPS Durani CK
			12	Maqbool	Gps: Sher Khan Pakha
			13		


Add: Agency Education Officer
Sadda Kurram Agency

No 97-123 dated 15-1-2013
Copy for information to the
1 Secretary Social Sector Development FATA
2 Director of Education FATA
3 Political Agent Kurram
4 AEO Parachinar Kurram
5 Agency Account office Parachinar
6 Teachers Concerned.


Add: Agency Education Officer
Sadda Kurram Agency



54

ADD: AGENCY EDUCATION
OFFICE SADDU KURRAM AGENCY.
PHONE: 0926-520674 FAX 0926520674
No. 4887-94 /Edu:
Dated Sadda: the 01/07/2016

RE APPOINTMENT ORDER

In the light of Secretary SSD notification No So(E)/SSD/CSTR/99-108 Dated 11-05-2017, vide DE FATA memo no 7306 dated 21-04-2016. The following PTC (male & female) teachers of community schools are re appointed on Regular temporary bases in BPS (7) with FA/FSc in BPS (9) plus usual allowances as admissible i.: regular BOYS/GIRLS PRIMARY SCHOOLS noted against their names with immediate effect.

S#	Name Of Teacher	Father Name	Existing Mcs/Fcs	Name of Re Apptt: Schools	Remarks
1	Fatima	Saifullah Khan	FCS Ghuya Ghara	GGPS Sher Khan Pakha	Against Vacant Post
2	Kausar Farid	Faridullah	FCS Doll Raghya	GGPS Shahbaz Sam	-----Do-----
3	Noor Jehan	Aziz-u- Rehman	FCS Doll Raghya	GGPS Shahbaz Sam	-----Do-----
4	Haleema Bibi	Shajawal Shah	FCS Zangai	GGPS Dar Alisherzai	-----Do-----
5	Rifat Naz ✓	Mir Zaman	FCS Nargis	GGPS Shamkanri	-----Do----- ✓
6	Seema Gul	Islam Gul	FCS Charkhel	GGPS Zarana	-----Do-----
7	Gohar Simab	Mirza Ali Khan	FCS Palossen	GGPS Shahbaz Sam	-----Do-----
8	Ghusia Afzal	Gul Afzal Khan	FCS Arwara Mella	GGPS Kharshah	-----Do-----
9	Humaira	Shamsul Haq	FCS Pass Mella	GGPS Jawdara	-----Do-----
10	Liaq Khan	Malak Khan	MCS Dand	GPS Wam Alisherzai	-----Do-----
11	Hidayat ullah	Hafiz-u-Rehman	MCS Mandara	GPS Kurat	-----Do-----

TERMS/CONDITION

1. His/Her appointment is purely made of Regular temporary basis and liable to termination at any time without assigning any notice, in case he want to resign their post, He/She will have to give one month prior notice or forfeit one month pay lieu thereof.
2. No payment will be made to the appointee until and unless their academic and professional certificate are got verified from the issuing Authorities concerned.
3. If He/She failed to take over charge within 15 days, His/Her appointment will automatically be considered as cancelled.
4. Charge reports should be submitted to this Office.

M. Muhammad Rehman
Vice Principal

Asim
Add: Agency Education Officer
Lower & Central Kurram Sadda

No _____ Dated _____ / _____ / 2016.

Copy for information to the:-

- 1:- Secretary SSD FATA Secretariat Peshawar.
- 2:- Director of Education FATA Peshawar.
- 3:- Account Office Parachinar.
- 4:- Teacher Concerned.

Asim

Add: Agency Education Officer
Lower & Central Kurram Sadda

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22-3-17

محضوَر جناب ڈائریکٹر ایجوکیشن ہاشم خان صاحب فائیکٹر ٹریٹ پشاور

جناب عالی درخواست برائے سابقہ سروس Increments بحالی

جناب عالی

مودبانہ گزارش ہے کہ ہم جملہ فائیکٹر اساتذہ کرام دس سال سے زائد عرصہ تک تسلسل کے ساتھ کیونل اسکول پراجیکٹ میں خدمات سرانجام دیتے رہیں۔ بلا آخر جہد مسلسل کے بعد پاریمان کی قائمہ کمیٹیوں برائے سفران ڈویژن اور ریگولرایزیشن کمیٹی کے سفارشات اور گورنر خیبر پختونخواہ کے احکامات کے روشنی میں کیونل اسکول پراجیکٹ اساتذہ کو انکی پراجیکٹ میں ابتدائی تقریری کے مدت سے مع واجبات وبقایا جات سروس ریگولرایزیشن کا حق تسلیم کیا گیا۔ جسکی رو سے دستیاب PST پوسٹوں پر کیونل اساتذہ کی مرحلہ وار سروس ایڈجسٹمنٹ (حد عمر کی رعایت) کے ساتھ ہوتی رہی۔ لیکن پاریمان کے قائمہ کمیٹیوں برائے سفران اور ریگولرایزیشن کمیٹی کے سفارشات اور گورنر خیبر پختونخواہ کے احکامات برعکس ان اساتذہ کی کنٹریکٹ عرصہ ملازمت سروس کو ابتدائی پراجیکٹ سروس سے سابقہ سروس Valueable/Countable تسلیم کرنے کے بجائے ان اساتذہ کی سروس ریگولرایزیشن کو موجودہ تعیناتی (Inaital Recuratment) قرار دے کر سابقہ سروس مراعات واجبات وبقایا جات سے یکسر محروم کر کے ان اساتذہ کو حال و مستقبل میں سینیاریٹی پر موشن اور ریٹائرمنٹ کے وقت پنشن، گریجویٹی حقوق کے حوا کے سے مختلف تحفظات خدشات اور تشویش زدہ صورتحال سے دوچار کیا ہے۔ حالانکہ برطبق ریگولرایزیشن نوٹیفیکیشن نمبر SO(E) 11-05-2012 مورخہ SSD/CSTR99-108 اور گورنر انتظامی حکمنامہ

نمبر SO-1/1-1GS/2012 مورخہ 28-05-2013 کے مطابق کیونل اساتذہ کی سروس مستقل انکی سابقہ کنٹریکٹ پراجیکٹ سروس کے بنیاد ہوئی ہے۔ جسکے متعلق حقائق و دلائل اور ثبوت یہ ہیں۔

GOVT OF KPK, FINANCE DEPARTMENT (REGULATION WING) Endst No:FD(PRC) 5-2/2002 Dated Peshawar the: 30-10-2009

(1) GRANT OF ANNUAL INCREMENTS TO FIX PAY TEACHERS IN THE LIGHT OF SUPREME COURT

JUDGMENT, (That all those teachers who were appointed on fix pay and were subsequently regularized against their posts, on acquiring completing requisite training successfully, would be entitled for such benefits of annual increments from the date of their first appointments as such but without arrears.

(2) As per S.No: 10 of the recommendation of the standing committee of SAFRON held on 21st December, 2011 at the parliament House Islamabad (F/A) FATA Secretariat should regularize the services of the Community Schools Teachers including their Previous Services and graded salaries as per previous practice without further delay.

(3) as per S.No. 4 of the senate standing committee of SAFRON date 09-03-2012 finally committee advised that problem of communal teachers serving in FATA Schools may be solved by clearing their all duse and regularization of thier service atc.

(۴) مراسلہ نمبر 5994-6006 مورخہ 12-09-2011 کیونل اسکول پراجیکٹ میں دوبارہ تعینات اساتذہ کی سابقہ پراجیکٹ / کنٹریکٹ سروس کو Valueable/Countable تسلیم کیا گیا۔

(۵) مراسلہ نمبر 2085-90 مورخہ 29-10-2015 اور مراسلہ نمبر 10380 مورخہ 02-09-2013 میں وضاحت موجود ہے، کہ کیونل اساتذہ سروس مستقل ابتدائی تعیناتی (Inaital Recuratment) نہیں۔ بلکہ گورنر پالیسی کے مطابق سروس ریگولرایزیشن ہے۔

(۶) مورخہ 13-03-2013 اسلام آباد اسٹیبلشمنٹ ڈویژن کا بیڈ کی سب کمیٹی برائے ریگولرایزیشن کا اجلاس منعقد ہوا جس میں فیصلہ ہوا کہ ڈویپمنٹ بجٹ پر کام کرانے والے کنٹریکٹ پراجیکٹ ملازمین کو نان دوپلمنٹ بجٹ پر ریگولر پوسٹ کی دستیابی کی صورت میں انکی سروس کو ریگولرایزیشن جسٹ کیا جائے۔

(۷) گورنر کی سمری کے مطابق کیونل اسکول پراجیکٹ میں عرصہ ملازمت کو Valueable/Countable مان کر ان کیلئے سروس ریگولرایزیشن پالیسی کی منظوری دی گئی۔

لہذا مندرجہ بالا شواہد و حقائق کے روشنی میں ان اساتذہ کی سابقہ سروس بحالی اور بقایا جات ادا کیگی کے احکامات صادر فرما کر انصاف کا بول بالا کیا جائے۔

عین انوازش ہوگی

ANZAR GULS / ZARDIN KHAN
GPS Saidullah Khan & others
0308-5337712-0343 9882032

عرض گزاران

1 56

29-8-18



DIRECTORATE OF EDUCATION
NEWLY MERGED TRIBAL DISTRICTS
WARSAK ROAD PESHAWAR, PAKISTAN
PHONE. 091-9210166 FAX 091-9210216

No. /Date Pesh: the / / /2018

NOTIFICATION.

The Competent Authority is pleased to regret the appeal of the community teachers for their regularization from retrospective effect on the recommendations of the appellate committee in the meeting held on 20/7/2017 as not admissible under the rules and policy.

DIRECTOR EDUCATION NMTD

Endst: No. 11096-99 /-

Dated Pesh: the 29/08 /2018.

Copy forwarded to the:-

1. District Education Officer, Khyber District.
2. PA to Director Education NMTD.
3. Teachers concerned.

[Signature]
Deputy Director (Estab.)

[Signature]

IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P. No. _____ / 2018

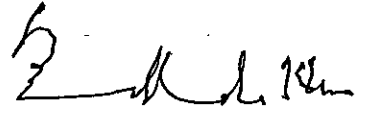
Anzar Gul & Others versus Director & Others

NOTICE

1. Director of Education, FATA Secretariat,
Warsak Road Peshawar.
2. Agency Education Officer,
Khyber Agency at Jamrud.
3. Agency Education Officer,
North Waziristan Agency.
4. Agency Education Officer,
FR Tank at D.I. Khan.
5. Agency Education Officer,
Kurram Agency at Parachinar

Please take notice that I am filing Writ Petition on behalf of petitioners before the Hon'ble Peshawar High Court, against the respondents to regularize the initial service of the petitioners rendered in the Community Schools to the regular service for pensionary and other benefits.

Dated: 17-09-2018



Saadullah Khan Marwat
Advocate

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63

IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P No. _____ /2018

Anzar Gul & Others versus Director & Others.

ADDRESSES OF THE PARTIES

PETITIONERS:

1. Anzar Gul S/O Zar Din, PST,
Government Primary School,
Saeed Ullah Jan Kalley,
Bara Khyber Agency.
2. Sadiq Ahmad S/O Sher Jan, PST,
Government Primary School
Toor Dara Jamrood Khyber Agency.
3. Khial Gul S/O Zahir Shah, PST,
Government Primary School Toor Dara,
Jamrood Khyber Agency.
4. Mohibullah S/O Ihsan Ullah, PST,
Government Primary School Toora
Tara Jamrood Khyber Agency.
5. Irat Khan S/O Ilyas Khan, PST,
Government Primary School Jani Khel,
Jamrood Khyber Agency
6. Muhammad Jan S/O Allah Baz, PST,
Government Primary School Nazar
Kalley, Landi Kotal Khyber Agency
7. Arman Gul S/O Lal Mat Khan, PST,
Government Primary School
Rekaley Jamrood Khyber Agency.
8. Ameen Shah S/O Mustan Shah, PST,
Government Primary School
Choorah No. 03, Jamrood Khyber Agency.
9. Rehman Gul S/O Ghirat Gul, PST,
Government Primary School Attari,
Jamrood Khyber Agency.
10. Sabit Khan S/O Gul Mar Jan, PST,
Government High School Choorah,
Jamrood Khyber Agency.

- 2
- 64
11. Shah Wali S/O Payo Noor, PST,
Government Primary School
Fiazoo Kalley, Jamrood Khyber Agency.
 12. Sajid Ahmad S/O Payo Khel, PST,
Government Primary School Wazir
Dand, Jamrood Khyber Agency.
 13. Noorat Khan S/O Awal Khan, PST,
Government Primary School
Jawara Mania, Jamrood Khyber Agency.
 14. Mushtaq Ullah S/O Abdul Qahar, PST,
Government Primary School
Nawar Mania, Jamrood Khyber Agency.
 15. Tariq Khan S/O Khan Sahib Khan, PST,
Government Primary School Khan Mast
Kalley, Jamrood Khyber Agency.
 16. Shufqat Ullah S/O Gul Said Khan, PST,
Government Primary School Khadim
Kalley, Jamrood Khyber Agency.
 17. Jam Dad Khan S/O Jan Muhammad Khan,
PST, Government Primary School Wallo Milla,
Jamrood Khyber Agency.
 18. Sher Zali S/O Khan Badshah, PST,
Government Primary School Meer
Ahmad Shah Kalley, Jamrood Khyber Agency.
 19. Umar Khan S/O Lal Mat Khan, PST,
Government Primary School Redi Gul
Kalley, Jamrood Khyber Agency.
 20. Saleh Jan S/O Khaista Meer, PST,
Government Primary School
Lashora Jamrood Khyber Agency.
 21. Abdul Qadir S/O Abdul Jalil, PST,
Government Middle School Sher
Afzal Kalley, Jamrood Khyber Agency.
 22. Muhammad Wakeel S/O Abdul Jalil, PST,
Government Primary School Kambila
Malagori, Khyber Agency.
 23. Fazale Rehman S/O Masooz Khan, PST,
Government Primary School Mian
Jaffar Shah Kalley, Jamrood Khyber Agency.
 24. Istekhar Khan S/O Rooh Khan, PST,
Government Primary School Pastoki,
Landi Kotal Khyber Agency.
 25. Farid Ullah S/O Kaba! Sher, PST,
Government Primary School Gulab
Kalley, Landi Kotal Khyber Agency.



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26. Serfarz Khan S/O Anwar Khan, PST,
Government Primary School Jawara
Mela, Malagori Khyber Agency.
27. Janab Khan S/O Shoghli Maan Khan,
PST, Government Primary School
Lashora Jamrood Khyber Agency.
28. Samad Meer S/O Muhammad Said,
PST, Government Primary School Lal
Mat Kalley, Jamrood Khyber Agency.
29. Islam Gul S/O Nabat Khan, PST,
Government Primary School Fazal
Ahmad Kalley, Jamrood Khyber Agency.
30. Gulab Sher S/O Aqal Meer, PST,
Government Primary School
Malak Sardar Meer Kalley,
Jamrood Khyber Agency.
31. Muhammad Saeed Khan S/O
Enzar Gul, PST, Government Primary
School Zabit Khan Kalley,
Jamrood Khyber Agency.
32. Umar Said S/O Sir Meer Khan, PST,
Government Primary School
Chapari, Jamrood Khyber Agency.
33. Hunar Said S/O Sir Meer Khan, PST,
Government Primary School Kambila,
Jamrood Khyber Agency.
34. Anzal Khan S/O Kazam Baig, PST,
Government Primary School
Gujjar Dand, Jamrood Khyber Agency.
35. Fazal Rabi Khan S/O Ghulam Nabi, PST,
Government Primary School, Ali Masjid,
Jamrood Khyber Agency.
36. Mir Habib S/O Fazal Khan, PST,
Government High School Badshah
Meer Kalley, Jamrood Khyber Agency.
37. Wazir Khan S/O Said Ullah Khan,
PST, Government Primary School
Sandana, Bara Khyber Agency.
38. Khyal Batt Khan S/O Doulat Khan, PST,
Government Higher Secondary School
Speen Dand, Jamrood Khyber Agency.
39. Samin Gul S/O Zar Khalil, PST,
Government Primary School Sher
Bahadar Kalley, Bara Khyber Agency.
40. Yar Muhammad S/O Mirza Gul, PST,
Government Primary School Zareef Kalley,
Bara Khyber Agency.

41. Muhammad Khan S/O Shaus Khan, PST,
Government Primary School Raza Khan,
Bara Khyber Agency,
42. Miraj Gul S/O Zain Gul, PST,
Government Primary School Kotkai
Tirah, Bara Khyber Agency.
43. Abid Khan S/O Zain Gul, PST,
Government Primary School Zafar Khan
Kalley, Bara Khyber Agency.
44. Hujat Khan S/O Samand Khan, PST,
Government Primary School Azam Din,
Bara Khyber Agency.
45. Said Ghani S/O Anar Gul, PST,
Government Primary School Kotaki,
Bara Khyber Agency.
46. Siraj Akbar S/O Muqem Khan, PST,
Government Primary School Mamal Mela,
Bara Khyber Agency.
47. Karna Khel S/O Talib Shah, PST,
Government Primary School
Mashkanara Mela, Bara Khyber Agency.
48. Syed Ahmad S/O Lal Madar, PST,
Government Middle School
Sheen Kamar, Bara Khyber Agency.
49. Hameed Ullah S/O Afsar Khan, PST,
Government Primary School Chooraa,
Bara Khyber Agency.
50. Iqbal Hussain S/O Zar Muhammad,
PST, Government Primary School
Zangai Bara Khyber Agency.
51. Shahid Khan S/O Muqam Din, PST,
Government High School Jafar Khan Kalley,
Bara Khyber Agency.
52. Suleman Shah S/O Gul Badshah,
PST, Government Primary School Pastoki,
Bara Khyber Agency.
53. Shah Je Khan S/O Gul Zameer, PST,
Government Primary School Zafar Kalley,
Bara Khyber Agency.
54. Abdul Qayum S/O Rehmat Gul, PST,
Government Primary School Gulab Khel,
Bara Khyber Agency.
55. Gul Amin S/O Angar Khan, PST,
Government Primary School
Khuramtan Kalley, Bara Khyber Agency.



56. Gul Zaman S/O Sturee Khan, PST,
Government Primary School
Yar Hamza Kalley, Bara Khyber Agency.
57. Raj Muhammad S/O Zahir Shah,
PST, Government Primary School
Kotkai, Bara Khyber Agency.
58. Bakht Mar Jan S/O Qandahar Khan, PST,
Government Primary School Habib Shah,
Bara Khyber Agency.
59. Raees Khan S/O Nauroz Khan, PST,
Government Primary School
Jafar Khan Kalley, Bara Khyber Agency.
60. Mir Akbar S/O Gul Akbar, PST,
Government Primary School Zangai,
Bara Khyber Agency.
61. Muhammad Raziq S/O Noor Zada,
PST, Government Primary School
Baber Khel Kalley, Bara Khyber Agency.
62. Guli Jan S/O Baghwan Gul, PST,
Government Primary School
Zafar Kalley, Bara Khyber Agency.
63. Shariat Khan S/O Lal Mar Jan, PST,
Government Primary School
Zafar Kalley, Bara Khyber Agency.
64. Abdul Rehman S/O Paya Khan, PST,
Government Primary School
Bine Bara Khyber Agency.
65. Irfan Ullah S/O Chaman Khan, PST,
Government Primary School Zangi,
Bara Khyber Agency.
66. Khaista Noor S/O Waliyat Shah,
PST, Government Primary School
Hayat Mir, Bara Khyber Agency.
67. Gul Hameed S/O Noor Zaden, PST,
Government Primary School
Hukam Shah, Bara Khyber Agency.
68. Saeeda Jehanzeb D/O Jehanzeb, PST,
Government Girls Primary School
Yar Gul Khel Kalley, Bara Khyber Agency.
69. Sajid Ullah S/O Gul Samand, PST,
Government Primary School
Sandana, Bara Khyber Agency.
70. Zenat D/O Abdul Qayum, PST,
Government Girls Primary School
Hayat Shah, Bara Khyber Agency.

- 6
- 69
71. Nadia Tabasum D/O Fazal Rahim,
PST, Government Girls Primary School
Sandana, Bara Khyber Agency.
 72. Farzana Jabeen D/O Qamar Din, PST,
Government Girls Primary School
Sultan Khel, Bara Khyber Agency.
 73. Roeeda Gul D/O Zareen Khan, PST,
Government Girls School Islam Gul,
Bara Khyber Agency.
 74. Rubina Shaheen D/O Faqir Muhammad,
PST, Government Girls Primary School
Amir Khan Kalley, Bara Khyber Agency.
 75. Shakeela Bano D/O Ghulam Muhammad,
PST, Government Girls Primary School
Kapar Tangi, Bara Khyber Agency.
 76. Saima Khan D/O Dr. Khan, PST,
Government Girls Primary School
Mkkhar Kot, FR Tank.
 77. Basroo D/O Muhammad Zaman, PST,
Government Girls Primary School
Payo Kot, FR Tank.
 78. Zainab Bibi D/O Hussain, PST,
Government Girls Primary School
Nawaz Khan Korona, FR Tank.
 79. Taj Bibi D/O Qalam Khan, PST,
Government Girls Primary School
Mussam Khan, FR Tank.
 80. Amna Bibi D/O Esa Khan, PST,
Government Girls Primary School
Akram Khan, FR Tank.
 81. Zaheena Sayed D/O Noor Muhammad Khan,
PST, Government Girls Primary School
Denak, FR Tank.
 82. Ambareen Bibi D/O Ghulam Qadir, PST,
Government Girls Primary School
Ghulam Sahee, FR Tank.
 83. Bilal Khan S/O Mamid Khan, PST,
Government Primary School
Shahbaz Kot, North Waziristan Agency.
 84. Abdul Ghafoor Khan S/O Gul Abad Khan,
PST, Government Primary School
Neik Umar Kot, NWA.
 85. Afrasiyab Khan S/O Akhtar Ali Khan,
PST, Government Primary School
Surma Jan Kot, NWA.


86. Aziz Ullah S/O Payel Khan, PST,
Government Primary School
Macha Khel, NWA.
87. Nor Zali Khan S/O Ghulam Jalil Khan,
PST, Government Primary School
Dewgar Saidgi, NWA.
88. Abdul Mutalib Khan S/O Sakhi Mar Jan,
PST, Government Primary School
Issor Kot, NWA.
89. Muhammad Ilyas S/O Badiuzaman,
PST, Government Primary School
Nimat Kot, NWA.
90. Muhammad Ghufraan S/O Inayat Ullah Khan,
PST, Government Primary School
Muhammad Amin Kot, NWA.
91. Ubaid Ullah Khan S/O Niaz Bat Khan,
PST, Government Primary School
Khwaja Wani, NWA.
92. Gul Attaullah S/O Umar Khan, PST,
Government Primary School
Muhammad Amin, NWA.
93. Hamid Ullah S/O Amir Muhammad, PST,
Government Primary School
Fazal Rehman, NWA.
94. Muhammad Zaman S/O Hazrat Khan,
PST, Government Primary School
Jalalabad Kot, NWA.
95. Tehsil Khan S/O Bakhel Jan, PST,
Government Primary School
Payo Jan Kot, NWA.
96. Muhammad Aslam Khan S/O Gul Rehman,
PST, Government Primary School
Wali Mad Khan Kot, NWA.
97. Noor Sala Khan S/O Yaqoob Khan, PST,
Government Primary School
Niamat Kot, NWA.
98. Shah Wazir S/O Yaqoob Khan, PST,
Government Primary School
Mir Ali Camp, NWA.
99. Baz Muhammad Khan S/O
Muhammad Azam Khan,
PST, Government Primary School
Rai Khan Kot, NWA.
100. Abid Ullah Khan S/O Mir Kalam Khan,
PST, Government Primary School
Abdi Khel, NWA.

- 8
101. Javid Iqbal S/O Amir Akbar, PST,
Government Primary School
Fateh Khan Kot, NWA.
102. Amal Khan S/O M. Nawaz Khan,
PST, Government Primary School
Rai Khan, NWA.
103. Atta Muhammad S/O Ghulam Muhammad,
PST, Government Middle School
Khair Khel Kalley, NWA.
104. Khan Walli S/O Mir Sali Khan, PST,
Government Primary School
Darpa Khel Kot, NWA.
105. Pawan Din S/O Gul Zaman, PST,
Government Primary School
Zar Jam Khel, NWA.
106. Nazar Gul S/O Ajeeb Gul, PST,
Government Primary School
Hangu Kot, NWA.
107. Amir Nawaz Khan S/O Akbar Khan,
PST, Government Primary School
Sakhi Marjan, NWA.
108. Arif Nawaz S/O Akbar Khan, PST,
Government Primary School
Mushki Alam, NWA.
109. Muhammad Ayaz Khan S/O Arsala Khan,
PST, Government Primary School
Noor Khan, NWA.
110. Jahan Baz Khan S/O Rameez Khan,
PST, Government Primary School
Hakeem Kot, NWA.
111. Hidayat Ullah S/O Pakhar, PST,
Government Middle Primary School
Patas Kot, NWA.
112. Aqal Zaman S/O Khushal Khan,
PST, Government Primary School
Abdullah Din, NWA.
113. Mir Shah jehan S/O Khyal Khan,
PST, Government Primary School
Sakhi Mar Jan, NWA.
114. Zahid ud Din S/O Ahmad Kaleem,
PST, Government Primary School
Syed Khan Kot, NWA.
115. Janat Khan S/O Mir Azam Khan,
PST, Government Primary School
Shahadat Kot, NWA.

116. Amir Salah Khan S/O Sharen Khan,
PST, Government Primary School
Usman Khel, NWA.
117. Hazrat Ullah S/O Sahib Khan, PST,
Government Primary School
Garyum, NWA.
118. Muhammad Ihsan S/O Sharen Khan,
PST, Government Primary School
Muhammad Daraz, NWA.
119. Nor Hayat Khan S/O Nawab Khan,
PST, Government Primary School
Zaman Khan Kot, NWA.
120. Ata Ullah Jan S/O Maiz Ullah Khan,
PST, Government Primary School
Walli Mad Khan, NWA.
121. Farmanullah S/O Toor Jan, PST,
Government Primary School
Zaman Khan, NWA.
122. Sarfaraz S/O Gul Raheem, PST,
Government Primary School
Noor Khan, NWA.
123. Muhammad Kamal Khan S/O M. Alam,
PST, Government Primary School
Gulab Khel, NWA.
124. Muhammad Asghar S/O Sayed Wali,
PST, Government High School
Ghondi Jamrood Khyber Agency.
125. Ezat Shah S/O Nooram Shah, PST,
Government Primary School
Arak, Kurram Agency.
126. Multan Aurang S/O Gul Samand,
PST, Government Primary School
Chapre, Kurram Agency.
127. Daulat Khan S/O Bahadar Khan,
PST, Government Primary School
Kamal Baza, Kurram Agency.
128. Nor Mar Jan S/O Gul Mar Jan, PST,
Government Primary School
Mir Bagh, Kurram Agency.
129. Shughla Hussain D/O Ghulam Hussain,
PST, Government Girls Primary School
Dogar, Kurram Agency.
130. Muhammad Zubair S/O Dilbar Khan,
PST, Government Primary School
Dagari No. 03, Kurram Agency.

131. Gul Haider Jan S/O Ghazi, Mar Jan,
PST, Government Primary School
Dagari, Kurram Agency.
132. Noor Khan S/O Zari Gul, PST,
Government Primary School
Mir Bagh, Kurram Agency.
133. Shareef Gul S/O Gul Mar Jan, PST,
Government Primary School
Kalat Mir Bagh, Kurram Agency.
134. Tahir Gul S/O Akhtar Gul, PST,
Government Primary School
Pastwan, Kurram Agency.
135. Wasim Shah S/O Sayed Anwar,
PST, Government Primary School
Super Kot, Kurram Agency.
136. Maqbool Ahmad S/O Muhammad Jan,
PST, Government Primary School
Sher Khan Mir Bagh, Kurram Agency.
137. Gohar Simab W/O Doost Muhammad,
PST, Government Girls Primary School
Shahbaz Samma, Kurram Agency.
138. Riffat Naz W/O Sheeren Badshah, PST,
Government Girls Primary School
Shahbaz Samma, Kurram Agency.
139. Gul Zahra D/O Zameen Akbar, PST,
Government Girls Primary School
Kagawaga, Kurram Agency.
140. Hussan Par D/O Nasir Hussain, PST,
Government Girls Primary School
Dall, Kurram Agency.
141. Nighat Naseem D/O Laiq Hussain, PST,
Government Girls Primary School
Lar Zar, Kurram Agency.
142. Fozia Afzal D/O Muhammad Afzal, PST,
Government Girls Primary School
Luqman Khan, Kurram Agency.
143. Naveeda Asghar D/O Asghar Jan, PST,
Government Girls Primary School
Adil Colony, Kurram Agency.
144. Shakeel Khatoon D/O Rehmat Hussain,
PST, Government Girls Primary School
No. 01 Para Chinar, Kurram Agency.
145. Nageena D/O Ali Mohgib, PST,
Government Girls Primary School
Amal Kot, Kurram Agency.

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- 73
146. Bibi Masooma D/O Sayed Agzal, PST,
Government Girls Primary School
Para Chinar, Kurram Agency.
 147. Salma Bangesh D/O Rajab Ali, PST,
Government Girls Primary School
Luqman Khel Sehra, Kurram.
 148. Shamal Jan Afridi S/O Sayal Khan Afridi,
PST, Government Primary School Dada Nika,
Bara Khyber Agency.
 149. Fateh Khan S/O Mula Khel, PST,
Government Primary School Mashkano
Mela, Bara Khyber Agency.
 150. Shakir Ullah S/O Shah Bahader,
PST, Government Primary School
Sheen Kamar, Bara Khyber Agency
 151. Najida D/O Tahseen Ullah, PST,
Government Girls Primary School
Shekmal Khel, Bara Khyber Agency.
 152. Alia Begium D/O Ghulam Jan, PST,
Government Girls Primary School
Musa Khan, Landi Kotal.
 153. Najma Begium D/O Hameed Khan,
PST, Government Girls Primary School
Turkistan Kalley, Bara Khyber Agency.
 154. Naz Gul D/O Mehar Dil, PST,
GFCS Mulagori, Jamrood
Khyber Agency.
 155. Ghulam Mustafa S/O Sharbat Khan,
PST, Government Primary School
Nasir Kalley, Jamrood Khyber Agency.
 156. Nighat D/O Yar Muhammad, PST,
Government Girls Primary School
Khyal Gul Kalley, Landi Kotal.
 157. Fatmia Habib D/O Ghulam Habib, PST,
Government Girls Primary School
Kose Wali Khel, Landi Kotal
 158. Khan Malik S/O Amir Jan, PST,
Government Primary School Kotki,
Bara Khyber Agency.
 159. Shahid S/O Muhammad Sarwar,
PST, Government Primary School
Jaffar Khan Kalley, Bara Khyber Agency.
 160. Noor Jamal S/O Shamal Jan, PST,
Government Primary School Mastk,
Bara Khyber Agency.

- 12 
- 74
161. Waris Khan S/O Naseer Khan; PST,
Government Primary School
Khana Zyarat, Bara Khyber Agency.
 162. Naveeda Robi D/O Madad Khan, PST,
Government Girls Primary School
Hayat Khan Kalley, Jamrood Khyber Agency.
 163. Shabana D/O Masal Khan, PST,
Government Girls Primary School
Neki Khel, Landi Kotal Khyber Agency.
All C/O Petitioner No. 1

RESPONDENTS:

1. Director of Education, FATA Secretariat,
Warsak Road Peshawar.
2. Agency Education Officer,
Khyber Agency at Jamrud.
3. Agency Education Officer,
North Waziristan Agency.
4. Agency Education Officer,
FR Tank at D.I. Khan.
5. Agency Education Officer,
Kurram Agency at Parachinar

Through

Petitioners



Saadullah Khan Marwat

Advocates

Dated: 17-09-2018

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR

W.P.No.4597-P/2018

Anzar Gul and others(Petitioner)

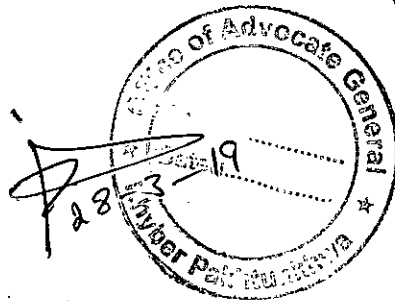
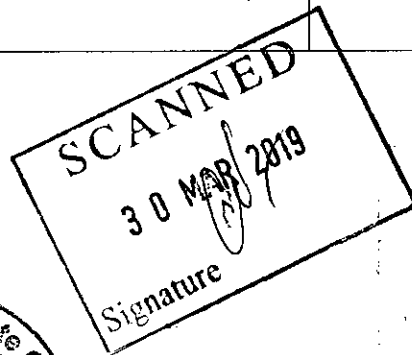
Versus

Director Education FATA & OthersRespondents.

INDEX

S.No	Description of documents	Annexure	Pages
1	Comments	----	1-5
2	Affidavit	---	6
3	Authority letter	----	7
4	Notification dated 11.05.2012	A	8-9
5	Letter dated 13.12.2010	B	10-11
6	Judgment dated 06.08.2013 in W.P 1968/2012	C	12
7	Judgment dated 06.08.2013 in W.P No. 2662/2012	D	13
8	Judgment dated 06.08.2013 in W.P No. 2265/2012	E	14-22

Dated 28/3/2019



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Deputy Registrar
28 MAR 2019

1

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR

26

W.P.No.4597-P/2018

Anzar Gul and others(Petitioner)

Versus

Director Education FATA & Others.....Respondents.

Comments on behalf of respondent No.1, 2, & 5

Respectfully shewith,

Preliminary Objection:

- That the petitioners has got no cause of action/“Locus standi” to File instant petition
- That the petitioners has concealed all the material facts from this honorable court
- That the petitioners has not come to this court with clean hands
- That the petitioner’s case is badly time barred and hit by principal of laches.
- Tat the petitioners is estopped by their own conduct to bring the instant petition.
- That the instant petition being devoid of merits is not maintainable in the present form.

OBJECTION ON FACTS

1. Subject to record
2. Subject to record
3. In correct. Respondent department being main stakeholders have kept continued schooling in alternative areas where schooling was possible however the project community schools was closed after expiry of project period. it is also pertinent to mention that in time when law & order situation was deteriorated regular schools were kept continued in areas where schooling was possible, many teacher in Erstwhile

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2

Fata illegally exploited the law and order situation and remained absent from duties .

4. Incorrect. Petitioners as admitted under Para (1) above on facts were appointed as community school teachers (project) for a project period only. The said project was closed on 31-12 2010, however after revised PC-I those community school which were function were reopened in 2011-12 meanwhile Community school teachers request respondent department for adjustment against regular post and also resort to litigation through various writ petitions. Respondent department keeping in view services of the petitioners and availability of regular PST post move a case to the competent authority and finally a notification with the approval of Governor Khyber Pakhtunkhwa was issued vide dated 11-5-2012 photo **copy attached annexure (A)** according to Ibid Notification working community school teachers were reappointed on regular available posts.it is incorrect to suggest that community schools were closed on 31-12-2010 due to law & order situation copy attached **as annexure (B)**
5. As Elucidated under Para(4) above on Facts.
6. As Elucidated under Para (4) above on Facts.
7. Incorrect. Notification was issued dated 11-5-2012 not vide order dated 29-10-2015. Respondent department re-appointed the petitioners as per provisions of Governor's notification dated 11.5.2012. Relevant provisions are reproduces as under.
 - i. The available regular vacant PST (BS-7) posts in the Primary / Middle Schools in FATA will be filled up from amongst the Community schools teachers and no fresh candidate considered for recruitment till the eligible Community Schools teachers are absorbed against regular posts of PST (BS-7) in their respective Agencies /FRs.

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28 MAR 2019

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- ii. The non- local eligible Community Schools Teachers shall be considered for re-appointment against the regular vacant posts of PST (BS-7) after adjustment of local qualified teachers.
- iii. The services of th3e un-qualified shall be dispensed with.
- iv. The Community Schools whose teachers are appointed and shifted to other schools against regular posts would be closed down.
- v. The respective Community Schools students would be shifted to nearby regular schools and no further recruitment of Community Schools teachers will to made.
8. As Elucidated under Para 7 on facts.
9. As Elucidated under Para 7 on facts.
10. In Correct. Petitioners are trying to mislead the Honrable court as they were appointed on project basis for a project period only which fact is self-admitted by the petitioners under Para (1) of the instant petition so it is incorrect to suggest that their previous services were on contact basis. It is also pertinent to mentioned over here that notification dated 11.5.2012 was challenged through various writ petition no **1968/2012 2662 /2012 , 2265/2012**, in which provision of notification dated 11-5-2012 was discussed in length and finally the honorable court has declared notification dated 11.5.2012 as prescribed policy for re- appointment /adjustment of community school (project) teachers. **photo copy judgment dated 6.8.2013 attached as annexure (C , D & E)** so the matter has become closed transaction as for as counting of pervious service (project) of petitioners towards pensionary benefit is concerned the matter has already been adjudicated and become res judicata in term section 11 of civil procedure code . It is also pertinent to mention over here that petitioner have dully accepted provision of notification dated 11-5-2012 which have no retrospective effect as for as the plea of the

78

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28 MAR 2019

(4)

petitioners is concerned. Petitioners also have not raised any objection on the process of their re-appointments vide notification dated 11-5-2012 nor have challenged its provision within the prescribed period of limitation. 79

Grounds

- (A). Respondent department have treated the petitioners as per law /policy and have no right if the petitioners have been violated. Petitioners have no locus standi thus writ petition being devoid of merits is liable to be dismissed.
- (B). Incorrect as Elucidated under Para 4 on Facts.
- (C). Incorrect hence denied as Elucidated under Para 10 on facts above.
- (D). Incorrect. Respondent department benefited community school teachers and adjusted them against regular available posts which were challenged by fresh candidate vide writ no 2265/2012 & 2626/2012 so it is incorrect to suggest that discrimination was done in case of the petitioners rather respondent successfully defended the policy of reappointment of community schools teachers on regular posts .
- (E). Incorrect. Hence denied as Elucidated under Para 10 above.
- (F). As Elucidated under Para 10 above.
- (G). Incorrect. Respondent department have not counted previous services of other community school teachers towards pension benefit as all the community school teachers who have been adjusted on regular posts in light of notification dated 11-5-2012 does not allow counting of previous project service.
- (H). Subject to provision of proofs.

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Deputy Registrar
28 MAR 2019

Respondent department also seeks permission of the honorable court to produced additional grounds and proofs at the time of hearing of case.


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90

PRAY


Keeping in view the above legal and factual position, it is humbly submitted that the instant writ petition may be ordered as dismissed.

Respondent No.1



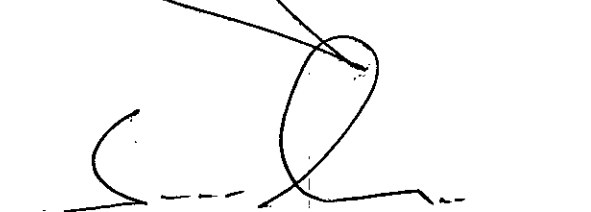
Director Education FATA

Respondent No.2



District Education Officer Khyber

Respondent No. 5



District Education Officer Kurram

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Deputy Registrar
28 MAR 2019

6

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR

91

W.P.No.4597-P/2018

Anzar Gul and others(Petitioners)

Versus

Director Education FATA & Others.....Respondents.

Affidavit

I Wisal khan focal person (litigation)of this office do hereby solemnly affirm and declare that the contents of the accompanying para wise comments submitted by the respondent No. 1 , 2 & 5 are correct to the best of my knowledge and belief and nothing has been concealed from this honorable court.

Deponent

17301-4824598-3

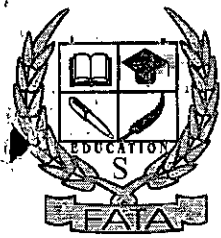
0345614466

Identified by

Advocate General,
Khyber Pakhtunkhwa, Peshawar.

No: 24597
Certified that the above was verified on solemnly affirmation before me in office this 28 day of Mar 2019 by Wisal Khan focal person Peshawar who was identified by [Signature]
Who is personally known to me: [Signature]
ACW 28/3/19/18 Peshawar

FILED TODAY
Deputy Registrar
28 MAR 2019



(7)

DIRECTORATE OF EDUCATION
NEW MERGED DISTRICTS SECRETARIAT
WARSAK ROAD PESHAWAR, PAKISTAN
PHONE. 091-9210166 FAX 091-9210216

No.

Date Pesh: the / /2019

81

Authority Letter

Mr. Wisal Khan focal person (Litigation) of this office is hereby authorized to submit comments in the subject writ petition no. 4597-P/2018 Filed by Anzar Gul and others VS DE FATA and other on behalf of Director Education and others (Erstwhile FATA).

**Director Education
New merged Districts**

Social Sectors Department
Warsak Road Peshawar

Notification

No. SO(E)/SSD/CSTR/99-108/ The Governor Khyber Pakhtunkhwa in his capacity as the Competent Authority has been pleased to approve the re-appointment of Community School Teachers who qualify to be posted against the regular posts of FST (BS-7) in phased manner at the respective Agencies & FRs, purely on merit basis in accordance with the existing recruitment criteria but in relaxation of upper age limit with immediate effect as specified below.

1. The available regular vacant PST-(BS-7) posts in the Primary/Middle Schools in FATA will be filled up from amongst the Community School Teachers and no fresh candidate considered for recruitment till all the eligible Community School Teachers are absorbed against regular posts in their respective Agencies/FRs.
2. The non-local eligible Community School Teachers shall be considered for re-appointment against the regular vacant posts of PST (BS-7) after adjustment of local qualified teachers.
3. The services of the un-qualified teachers shall be dispensed with. ✓
4. The Community Schools whose teachers are appointed and shifted to other schools against regular posts, would be closed down.
5. The respective Community Schools students would be shifted to nearby regular schools and no further recruitment of Community School teachers will be made.

Secretary
Social Sectors Department,
FATA Secretariat, Peshawar

Endst No. Even Dated Peshawar the 11/05/2012

Copy forwarded to the:-

1. Secretary to Governor, Khyber Pakhtunkhwa Peshawar.
2. Addl: Accountant General (PR) Sub Office Peshawar.
3. Director Education FATA, Peshawar.
4. All Political Agents in FATA.
5. DCO Peshawar, Kohat, Bannu, Lakki, D.I.Khan & Tank.
6. Agency/ District Accounts Officers concerned
7. All the Agency Education Officer in FATA
8. PS to Additional Chief Secretary FATA Peshawar.
9. PS to Secretary Social Sectors Department, FATA Secretariat, Peshawar.
10. PS to Secretary P&D, FATA Secretariat, Peshawar.

Section Officer (Edu) SSD
FATA Secretariat, Peshawar

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④

FATA SECRETARIAT
(Social Sector Department)
Warsak Road Peshawar

Notification.

No. SO (E) /SSD/CSTR/99-108/ The Governor Khyber Pakhtunkhwa in his capacity as the Competent Authority has been pleased to approve the re-appointment of Community Schools Teachers who qualify to be posted against the regular posts of PST (BS-7) in phased manner at the respective Agencies & FRs , purely on merit basis in accordance with the existing recruitment criteria but in relaxation of upper age limit with immediate effect as specified below.

1. The available regular vacant PST (BS-7) posts in the Primary / Middle Schools in FATA will be filled up from amongst the Community schools teachers and no fresh candidate considered for recruitment till the eligible Community Schools teachers are absorbed against regular posts of PST (BS-7) in their respective Agencies /FRs.
2. The non- local eligible Community Schools Teachers shall be considered for re-appointment against the regular vacant posts of PST (BS-7) after adjustment of local qualified teachers.
3. The services of the un-qualified shall be dispensed with.
4. The Community Schools whose teachers are appointed and shifted to other schools against regular posts would be closed down.
5. The respective Community Schools students would be shifted to nearby regular schools and no further recruitment of Community Schools teachers will be made.

-sd-

Secretary
Social Sectors Department
FATA Secretariat Peshawar.

Endst. No. Even dated Peshawar the 11/05/2012

Copy forwarded to the.

1. Secretary to Governor's Khyber Pakhtunkhwa Peshawar.
2. Addl: Accountant General (PR) sub Offices Peshawar.
3. Director Education FATA, Peshawar.
4. All Political Agents in FATA.
5. DCO Peshawar, Kohat, Bannu, Lakki, D.I Khan & Tank.
6. Agency / Districts Accounts Officer concerned.
7. All the Agency Education officer in FATA.
8. PS to Additional Chief Secretary FATA , Peshawar.
9. PS to Secretary Social Sectors Department FATA Secretariat Peshawar.
10. PS to Secretary P&D FATA Secretariat Peshawar.

ATTESTED

-sd-

Section Officer (Edu)
FATA Secretariat Peshawar

10



FATA SECRETARIAT
 DIRECTORATE OF EDUCATION
 ANTEEN, PAKHTUNKHWA, WARSAK ROAD PESHAWAR, PAKISTAN
 PHONE: 011-1110166 FAX 011-1110218
 No. 2278-87
 Date Pesh: the 13/12/2010

3

B

To: All the Agency Education Officers
 in FATA

Annex - A

Subject: CLOSURE OF ALL COMMUNITY SCHOOLS IN FATA W.E.F. 31.12.2010

Memo:

I am directed to convey the policy decision of the competent authority on the above noted subject and to ask you to close all the community schools in FATA w.e.f. 31.12.2010. The teachers and class-IV working in these schools should be given a Notice to the effect that their services will be dispensed with on 31.12.2010. However, they may be given preference in recruitment against regular posts by giving experience marks for the service rendered in community schools as per policy. The regular vacant posts be advertised immediately and recruitment process completed as per prescribed procedure on priority.

Dy. Director (P&M)

Encls: No. _____

Copy to the:-

1. Addl: Chief Secretary, FATA.
2. Secretary to Governor, Khyber Pakhtunkhwa, Peshawar.
3. Secretary A&C, FATA Secretariat, Peshawar.
4. Secretary P&D, FATA Secretariat, Peshawar.
5. Secretary Law & Order, FATA Secretariat, Peshawar.
- 6-12. All Political Agents in FATA.
- 13-18. District Coordination Officers Peshawar, Kohat, Bannu, Laski, Tank, D.I.Khan.
19. ACPR Sub Office Peshawar.
- 20-26. All Agency Accounts Officers.
- 27-32. District Accounts Officers Kohat, Bannu, Laski, Tank, D.I.Khan.
33. P.A to Director Education FATA.

ATTESTED

Dy. Director (P&M)

Attested

Attested



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FATA SECRETARIAT
DIRECTORATE OF EDUCATION
WARSAK ROAD PESHAWAR, PAKISTAN
PHONE 091-9210166 FAX 091-9210216

No. 88-87 Dated. 13/12/2010

To

All the Agency Education Officer
in FATA

Subject:

CLOSURE OF ALL COMMUNITY SCHOOLS IN FATA W.E.F
21.12.2010

Memo.

I am directed to convey the policy of decision of the competent authority on the above noted subject and to ask to close all the community schools in FATA w.e.f 31.12.2010. the teachers and class-IV working in these schools should be given a notice to the effect that their services will be dispensed with 31.12.2010. however they may be given preference in recruitment against regular posts be given experience marks for his service rendered in community schools as per policy. The regular vacant posts be advertised immediately and recruitment process completed as per prescribed procedure on priority.

-sd-

Deputy Director (P&M)

Endst. No. 8888-89

1. Additional Chief Secretary FATA.
2. Secretary Governor Khyber Pakhtunkhwa.
3. Secretary AI&C Department FATA.
4. Secretary P&D FATA Secretariat Peshawar.
5. Secretary LAW & Order FATA Secretariat Peshawar.
- 6-12. All the political Agents in FATA.
- 13-18. Districts Coordination Officers Peshawar, Kohat, Bannu, Lakki, Tank and DI Khan.
19. AGPR sub Office Peshawar.
- 20-26. All Agency Account Officers.
- 27-32. District Account Officers, Kohat, Lakki, Bannu, DI Khan, Tank.
33. PA to Director Education FATA.

ATTESTED

-sd-

Deputy Director (P&M)

V B W (12)

Judgment Sheet

IN THE PESHAWAR HIGH COURT,
PESHAWAR

JUDICIAL DEPARTMENT

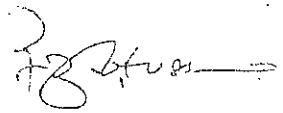
...W.P....No...1968....Of.....2012..

JUDGMENT

Date of hearing.....06.08.2013.....

Appellant (M) Muhammad Gul etc. By...Muhammad Ayub Shinwari Advocate
Respondent (Govt etc.) By...Ijaz Ansari Advocate and Malik Mujtaba

MALIK MANZOOR HUSSAIN, J:- For the
reasons recorded in our detailed judgment of
even date in W.P.No.2265/2012 titled Arshid
Khan Vs. Director Education FATA & others,
this petition is dismissed.


JUDGE


JUDGE

Announced.
Dt. 6/8/2013.


ATTESTED

23/8/13

(13)

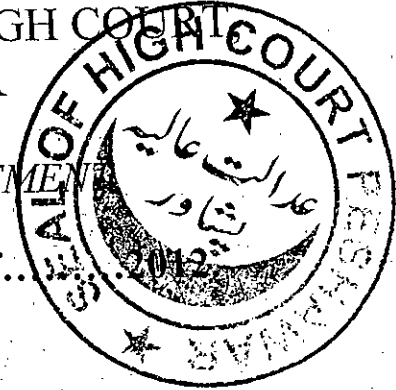
(52)

Judgment Sheet

IN THE PESHAWAR HIGH COURT
PESHAWAR

JUDICIAL DEPARTMENT

...W.P....No...2662....Of...



JUDGMENT

Date of hearing.....06.08.2013.....

Appellant (Muhammad Younas) By L. Nawab Ali Noor Advocate

Respondent (Govt. etc.) By Ijaz Anwar Advocate and Malik Mujtab

MALIK MANZOOR HUSSAIN, J:- For the

reasons recorded in our detailed judgment of
even date in W.P.No.2265/2012 titled Arshid
Khan Vs. Director Education FATA & others,
this petition is dismissed as withdrawn.

ATTESTED

Malik Manzoor Hussain

JUDGE

SJK

hau

JUDGE

Announced.
Dt.6/8/2013.

*Office
23/8/13*

CERTIFIED TO BE TRUE COPY
Examiner
Peshawar High Court, Peshawar
Authorized Under Article 87 of
The Constitution Order 1984
01/08/2017

W.A. 14

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(9)

(9)

Judgment Sheet

IN THE PESHAWAR HIGH COURT,
PESHAWAR

JUDICIAL DEPARTMENT

...W.P....No....2265....Of.....2012.

JUDGMENT

Date of hearing.....08.08.2013.....

Appellant (Arshid Khan etc) P.M. Muhammad Ijaz Khan Sabi A.

Respondent (Director Education FATA etc) P.M. Ijaz Anwar, Advocate
Malik Mustabait

MALIK MANZOOR HUSSAIN, J:- Through this single judgment, we intend to dispose of titled writ petition as well as connected W.P.No.1968/2012 with COC No.314/2012, W.P.No.2086/2012, W.P.No.2662/2012 and W.P.No.3444/12, as common questions of fact and law are involved in all the petitions.

ATTESTED

2. Briefly, the facts of the case are that the petitioners are residents of FATA and FRs, having acquired respective training and qualification to be posted as Primary School Teachers. The grievance of the petitioners starts with issuance of notification dated 11.5.2012, issued on the approval of Governor Khyber Pakhtunkhwa, in his capacity as the Competent Authority, whereby as per Clause-1 of said notification the available regular PST Post in Primary/Middle school in FATA had to

15

be filled from amongst the Community School Teachers and no fresh candidate was to be considered for recruitment till all the eligible Community School Teachers are absorbed against the relevant post in their respective Agencies/FR. This notification was followed by another notification dated 28.6.2012 issued by Directorate of FATA Secretariat whereby direction was issued to all the Agency Education Officers in FATA for re-appointment of Community School Teachers against the vacant PST post. Being aggrieved, the petitioners of all the above mentioned petitions have impugned the legality and propriety of above mentioned notification through Constitutional petitions.

3. The learned counsel for the petitioners contended that the impugned notifications are not only illegal and void, but the same defeated the fundamental right of the petitioners to be considered for appointment of PST through a fair and transparent competition. He further argued that the impugned notification has been passed in utter disregard of judgment of this Court dated 13.5.2010 passed in W.P.No.2087/2009, wherein it was held that only

ATTESTED

16

5 marks be given to the teacher of Community School Teachers for rendering their services in these schools. He further argued that present is the case of discrimination and violation of fundamental rights, thus prayed for issuance of appropriate writ against respondents. The learned counsel for the petitioners in connected petitions adopted the arguments of instant petitioners' counsel except the petitioners of W.P.No.2662/2012, who requested for withdrawal of petition.

4. Conversely, the learned Standing counsel appearing on behalf of the respondents argued that the impugned notifications have been issued in order to replace the grievance of Community School Teachers as they had long service at their credit and after a long struggle for their regularization, the matter was put through a summary to worthy Government of Khyber Pakhtunkhwa for their regularization and the existing 293 regular vacant post created in newly constructed Primary/Middle Schools in FATA was to be filled on merit basis from amongst the Community School Teachers and no fresh candidate was to be considered for recruitment.

ATTESTED

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all the existing Community School Teachers were absorbed against the newly created regular posts in FATA. This summary was approved through impugned notification dated 11.5.2012 and in compliance of that, all the Community School Teachers, who rendered more than 10 years service on contract basis in the respective schools were made eligible to be posted. He further argued that the petition is not maintainable in its present form, firstly, on the ground that the appointment made in the year 2012 has not been challenged through the instant writ petition and secondly nor the new appointees have been arrayed as respondents. The rights created in favour of Community School Teachers whose services have been regularized through notification dated 11.5.2012 were to be adversely effected, if the instant petitions are allowed.

ATTESTED

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5. Arguments heard and record perused. We have gone through judgment passed in W.P.No.324/2008 dated 28.5.2009 disposed of by a Division Bench of this Court. That writ petition was filed by Community School Teachers against

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PTC posts were advertised to be filled through open merits without any preference being given to the already contract employees, wherein a concessional statement was made by Standing counsel for political authorities that the writ petitioners could be given 5 additional marks for their service rendered at PTC and they shall be given preference but subject to merits. So, with these observations, the writ petition alongwith connected 3 writ petitions were disposed of, on the basis of order passed in W.P.No.2087/2009 alongwith connected writ petitions and COCs on 28.5.2009, by this Court.

ATTESTED

6. Directorate of Education FATA Secretariat, Peshawar issued direction through letter dated 18.6.2010 to all the Agencies Education Officers in FATA that in the light of decision of this Court dated 13.5.2010, the Community School Teachers are to be given 5 marks for their service rendered in Education Department of FATA.

7. Thereafter grievances were shown by the Community School Teachers which could not get regularization of their service despite the

27

contact basis in the Community Schools. The National Assembly/Senate Standing Committees for State and Frontier Regions also recommended the regularization of services of Community School Teachers in their meeting held on 21.12.2011 and 9.3.2012 in Parliament House, Islamabad. Thus keeping in view the genuine grievance of the Community School Teachers and the recommendation of Standing Committees, a summary was put for Governor Khyber Pakhtunkhwa by FATA Secretariat, Directorate of Education through Secretary Social Sector FATA Secretariat and the same was approved by the Worthy Governor through impugned notification dated 11.5.2012 followed by letter dated 28.6.2012. It will be useful to reproduce hereunder notification dated 11.5.2012:-

ATTESTED

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"Notification

No. SO(E)/SSD/CSTR/99-108/. The Governor Khyber Pakhtunkhwa in his capacity as the Competent Authority has been pleased to approve the re-appointment of Community School Teachers who qualify to be posted against the regular posts of PST (BS-7) in phased manner at the respective Agencies & FRs. Purely on merit basis in accordance with the existing recruitment criteria but in

Handwritten mark resembling a stylized signature or initials.

(231)

relaxation of upper age limit with immediate effect as specified below.

1. The available regular vacant PST (BS-7) posts in the Primary Middle School in FATA will be filled up from amongst the Community School Teachers and no fresh candidate considered for recruitment till all the eligible Community School Teachers are absorbed against regular posts in their respective Agencies/FRs.

2. The non-local eligible Community School Teachers shall be considered for re-appointment against the regular vacant posts of PST (BP-7) after adjustment of local qualified teachers.

3. The services of the un-qualified teachers shall be disposed with.

4. The Community School whose teachers are appointed and shifted to other schools against regular posts, would be closed down.

5. The respective Community School students would be shifted to nearby regular schools and no further recruitment of Community School Teachers will be made."

ATTESTED

8. The contention of the learned counsel for the petitioners that these notifications were passed in violation of earlier judgment of this Court dated 28.5.2009 and dated 13.5.2010 have got no substance. As both the judgments were honoured through office order dated

21

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Community School Teachers and not to fresh candidates. It is pertinent to note that instant and the connected petitions are not filed by Community School Teachers but by the fresh candidates, so they are on different footing. The notification issued by the Governor dated 11.5.2012 is much later than the judgment dated 28.5.2009 and as observed earlier that earlier judgment was passed on different footing and with different context.

9. We have noticed that in pursuance of notification dated 11.5.2012, all the appointments were made in the year 2012 in different Agencies and copies of appointment order dated 17.8.2012 issued for Mohmand Agency is made available on file.

10. Neither these appointment orders have been challenged nor the appointees have been arrayed as party. The impugned notification is issued in the best interest of already working Community School Teachers. This Court has already taken notice of agonies of the existing Teachers and issued directions to regularize the service of existing Teachers. The fresh candidates can be adjusted after available

ATTESTED



Appd.

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regular vacant posts are filled from amongst the existing Community School Teachers.

11. We have noticed that the impugned notification has not closed the door of recruitment for the new candidates in future. No discrimination or vested right to the post could be pointed out by the petitioners. In a similar situation, this Court has already issued a writ bearing No.263/2010 dated 14.6.2011 wherein the Education Department, FAT had been advised to adjust the Community School Teachers having more than 3 years service at their credit against the regular post.

ATTESTED



In view of what has been discussed above, we are of the view that instant as well as connected petitions bearing numbers W.P.No.1968/2012, W.P.No.2086/2012 and W.P.No.3444/12 being devoid of any merits are dismissed alongwith COCs and CMs. Writ petition No.2662/2012 is dismissed as withdrawn alongwith the CMs.

[Signature]
JUDGE

[Handwritten mark]

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IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P No. 4597-P/2018

Fixed for 16-05-2019

Anzer Gul & Others

versus

Director & Others

REJOINDER

Respectfully Sheweth,

Answer to Preliminary Objections:

- i. Not correct. Petitioners rendered satisfactory services to the department for more than 10 years but no benefits of the same was extended to them.
- ii. Not correct. No material facts was concealed nor brought on surface by the respondents.
- iii. Not correct. Petitioners have come to the hon'ble court with clean hands.
- iv. Not correct. Writ Petition never hits by latches and that too when petitioners seeks benefits of the rendered services followed by regular services..
- v. Not correct. No estoppel ever exists.
- vi. Not correct. The instant petition requires merit, so is maintainable.

ON FACTS

- 1-2. Record is attached with the Writ Petition.
3. Not correct. The para of the petition is correct regarding law and order situation in the area. No evidence is either available nor attached with the comments to show closer of the project period and if petitioners were absent as stated in the para of comments, then law was present to proceed against them but they were not absent from duty.



FILED TODAY
Deputy Registrar
07 MAY 2019

4. Not correct. In this para though letter dated 15-11-2010 regarding closer of the schools but in fact no school was closed nor any notice for termination of services of petitioners was issued nor is available on the record. It was the need of the time to educate the people of the area. 99
- 5-6. As per para No. 04 & 05 of the Writ Petition, Summary was approved by the Governor to regularize services of the Community School Teachers (Petitioners) and other staff on 30-04-2012.
7. Not correct. The Governor approved the appointments of the teachers on regular basis in BPS-07 at that time on 11-05-2012. In comments respondents supported the version of petitioners.
- 8-9. As above. The services of teachers were regularized as is evident from annex "G".
10. Not correct. Petitioner's representation was regretted without giving any reason and it is also an admitted fact that former services shall be considered for service benefits of every servant whatsoever.

More so, the cited judgments are on different footings and are not applicable to the case of petitioners.

GROUND S:

All grounds of the Writ Petition are legal and correct, while that of the comments are illegal and incorrect.

It is, therefore, most humbly requested that the Writ Petition be accepted as prayed for.

Petitioner

Through



Saadullah Khan Marwat
Advocate

Dated: 02-05-2019

FILED/TODAY
Deputy Registrar
07 MAY 2019

120

IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P No. 4597-P/2018

Anzer Gul & Others

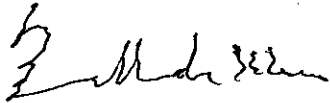
versus

Director & Others

AFFIDAVIT

I, Anzar Gul S/O Zar Din, PST, Government Primary School Saeed Ullah Jan Kalley, Bara Khyber Agency, (Petitioner No. 01) do hereby solemnly affirm and declare that the contents of the **Rejoinder** are true and correct to the best of my knowledge and belief.

Identified By:



Saadullah Khan
Advocate,



DEPONENT

CNIC #: 21201-2701312-5

Cell NO. 03474443883

No. <u>08029</u>
Certified that the above was verified on solemnly affirmation before me on this <u>6</u> day <u>May</u> 19 <u>2019</u> at <u>Zar Din</u> by <u>Anzar Gul</u> S/O <u>Zar Din</u> Advocate.
Signature: <u>[Signature]</u>
Notary Public, Peshawar

FILED TODAY

Deputy Registrar

07 MAY 2019

IN THE PESHAWAR HIGH COURT, PESHAWAR

C.M. No. 2283-P/2019

IN

W.P No. 4597-P/2018

Fixed for 30-10-2019

Anzar GUI & Others

versus

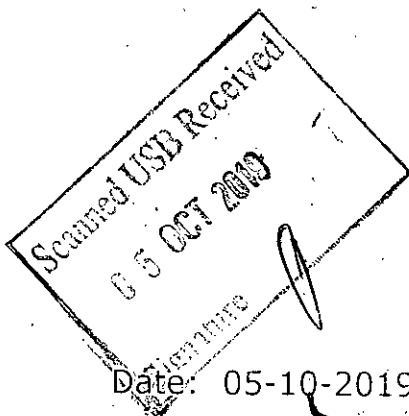
Director & Others

**APPLICATION FOR CHANGE OF
NOMENCLATURE OF RESPONDENTS:**

Respectfully Sheweth,

1. That at the time of filing of the Writ Petition the nomenclature of respondents were given as per their designations.
2. That on account of the merger of FATA area into settle, the nomenclature of respondents was changed and would be as under as per order sheet dated 19-09-2019.
 - i. Director, Elementary & Secondary Education Department, KP, Peshawar.
 - ii. District Education Officer, District Khyber at Jamrud.
 - iii. District Education Officer, District Waziristan at Miranshah.
 - iv. District Education Officer, District Tank at D. I. Khan.
 - v. District Education Officer, District Kurram at Parachinar.

It is, therefore, most humbly requested that respondents in future be served with fresh nomenclature instead of the former.



Date: 05-10-2019

FILED TODAY
Deputy Registrar
05 OCT 2019

Through

Petitioners

Saad Ullah Khan Marwat
Advocate

IN THE PESHAWAR HIGH COURT, PESHAWAR

C.M. No. 22937/2019
IN
W.P No. 4597-P/2018

102

Anzar GUI & Others versus Director & Others

AFFIDAVIT

I, Anzar Gul S/O Zar Din, PST, Government Primary School Saeed Ullah Jan Kalley, Bara Khyber Agency, (Petitioner No. 01) do hereby solemnly affirm and declare that the contents of the **Application** are true and correct to the best of my knowledge and belief.

Identified By:

Saad Ullah Khan

Saad Ullah Khan
Advocate,

Anzar Gul

DEPONENT
CNIC #: 21201-2701312-5
Cell No. 0308-5331712

No. 9637
Certified that the above was verified on solemnly affirmation before me in office, this 05 day of OCT 2019
ANZAR GUL
s/o ZAR DIN KHYBER
who was identified by SAAD ULLAH KHAN
Who is personally known to me:
<i>Saad Ullah Khan</i>
05/10/2019
Peshawar High Court, Peshawar

FILED TODAY
Deputy Registrar
05 OCT 2019