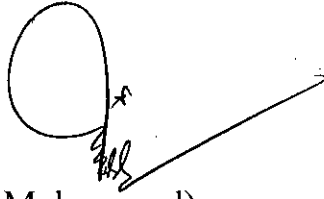


04.01.2023

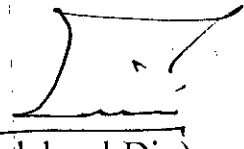
Mr. Taimur Ali Khan, Advocate present and submitted Wakalatnama in favor of the appellant. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has been newly engaged in the instant appeal and has not gone through the brief. Adjourned. To come up for arguments on 05.04.2023 before D.B.

SCANNED  
KPS  
PESHAWAR



(Mian Muhammad)  
Member (E)




(Salah-ud-Din)  
Member (J)

31.08.2022

Appellant in person present. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Mr. Tufail, Assistant for the respondents present.

Reply/comments on behalf of respondents submitted through office which are placed on file. Copy of the same is handed over to the appellant. Adjourned. To come up for rejoinder, if any, and arguments on 07.11.2022 before D.B.


  
(Mian Muhammad)  
Member (E)


07.11:2022

Counsel for the appellant present.

Asif Masaud Ali Shah learned Deputy District Attorney for the respondents present.

Former made a request for adjournment on the ground that he has not prepared the brief. Muharrir of the court is directed to properly place on file the comments submitted by the respondents. Adjourned. To come up for arguments on 04.01.2023 before D.B.

  
(Fareeha Paul) -  
Member (E)

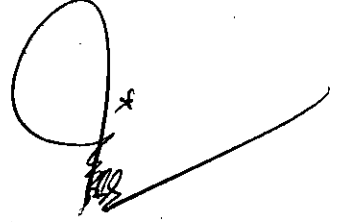
  
(Rozina Rehman)  
Member (J)

SCANNED  
KPST  
Peshawar

31.03.2022

None for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG alongwith Mr. Masood Khan, Litigation Officer DEO(M) Nowshera for respondents present.

Written reply/comments on behalf of respondents not submitted. Representative of the respondents seek time to submit the same on the next date. Adjourned. To come up for written reply/comments on 17.06.2022 before S.B.



(MIAN MUHAMMAD)  
MEMBER(E)

17<sup>th</sup> June 2022

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG alongwith Asif Khan, Assistant for the respondents present.

Despite three opportunities given to the respondents, they have not submitted reply. The respondents are given last opportunity to submit reply within 07 days from today, failing which their right to file reply shall be deemed as struck off by virtue of this order. To come up for arguments before the D.B on 31.08.2022. The case will not be adjourned on the ground of non-filing of reply/comments



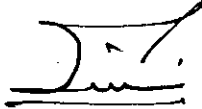
(Kalim Arshad Khan)  
Chairman

SCANNED  
KPST  
Peshawar

21.10.2021

Junior to counsel for the appellant and Mr. Muhammad Adeel Butt, Addl. AG for the official respondents present. Nemo for private respondents.

Written reply of the respondents is still awaited. Learned AAG is required to contact the official respondents. Proper notices be issued to private respondents. Last opportunity is granted to the respondents to furnish reply/comments within 10 days in office positively, failing which their right of reply shall be deemed as struck off. Case to come up for arguments on 11.01.2021 before the D.B.



(Salah-ud-Din)  
Member(J)



Chairman

31.01.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG for respondents present.

Reply/comments on behalf of respondents are still awaited. Learned Additional Advocate General sought time for submission of reply/comments. Granted. To come up for reply/comments before the S.B on 31.03.2022.

SCANNED  
KPST  
Peshawar



(Atiq-Ur-Rehman Wazir)  
Member (E)

05.08.2021

Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant contends that the case of Mr. Asghar Ali Vide Service Appeal No. 1191/2020 involving common question of facts and law has already been admitted for regular hearing. Further contends that the appellant has suffered in term of her due right for promotion by wrong promotion of others i.e. private respondents. Points raised need consideration. The appeal is admitted for hearing subject to all legal objections including that of limitation to be determined during full hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 21.10.2021 before the D.B.

Appellant Deposited  
Security & Process Fee

Chairman

23.02.2021

The learned Member Judicial Mr. Muhammad Jamal Khan is under transfer, therefore, the case is adjourned. To come up for the same before S.B on 09.06.2021.



Reader

09.06.2021

Junior to counsel for the appellant present. He states that learned senior counsel is indisposed today and requests for adjournment. Adjourned to 15.09.2021 for preliminary hearing before S.B.



Chairman

15.09.2021

Appellant present through counsel who requested for a short adjournment in order to produce the promotion order; allowed. To come up on 23/9/2021 for hearing before S.B



(Rozina Rehman)  
Member (J)




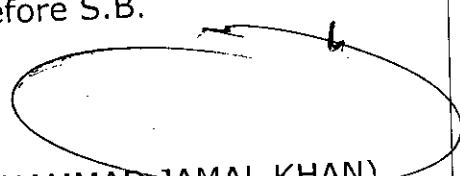
SCANNED  
KPST  
Peshawar

Form- A

# FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 9147 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/08/2020	<p>The appeal resubmitted today by Mr. Muhammad Farooq Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	28.09.2020	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>28/09/2020</u></p> <p> CHAIRMAN</p>
	28.09.2020	<p>Counsel for the appellant present. Requests for further time to prepare the brief. Adjourned to 25.11.2020 before S.B.</p> <p> Chairman</p>
	25.11.2020	<p>Mr. Muhammad Farooq, Advocate, for appellant is present. He has not prepared the brief and is seeking time for its preparation. Adjourned to 23.02.2021 on which date file to come up for preliminary hearing before S.B.</p> <p> (MUHAMMAD JAMAL KHAN) MEMBER (JUDICIAL)</p>

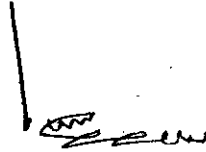
SCANNED  
KPST  
-Peshawar

The appeal of Mr. Asif Khan SST GHS Banda Sheikh Ismail Nowshera received today i.e. on 06.07.2020 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Affidavit may be got attested by the Oath Commissioner.
- 3- Annexures of the appeal may be attested.
- 4- Annexures of the appeal may be flagged.
- 5- Approved file cover is not used.
- 6- Copy of notification mentioned in para-2 of the memo of appeal (Annexure-A) is not attached with the appeal which may be placed on it.
- 7- Copies of detail list and advertisement mentioned in para-4 of the memo of appeal (Annexure-C) are not attached with the appeal which may be placed on it.
- 8- Copy of writ petition in respect of appellant and order passed by the Hon'ble Peshawar High Court mentioned in the memo of appeal are not attached with the appeal which may be placed on it.
- 9- Copies of appointment orders of others employee mentioned in para-6 of the memo of appeal are not attached with the appeal which may be placed on it.
- 10- Copy of impugned order and departmental appeal against it are not attached with the appeal which may be placed on it.
- 11- Wakalat nama in favour of appellant be placed on it.
- 12- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1379 /S.T,

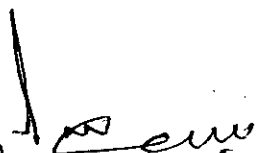
Dt. 07-07 /2020.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Muhammad Farooq Khan Adv. Nowshera

Objections no. 6, 7, 8 and 10 are still stands beside this all the annexures are illegible therefore, the appeal in hand is returned again to the counsel for the appellants for completion and resubmission within 15 days.

No. 1932 /S.T  
dt. 28/7 /2020

  
Registrar



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

Service Appeal No: 9147/2020



Asif Khan, SST (M) District Nowshera.....

**VERSUS**

Secretary (E&SE) Department, Khyber Pakhtunkhwa & others.....Respondents

**JOINT PARAWISE COMMENTS FOR&ON BEHALF OF THE RESPONDENTS No: 1-3**

Respectfully Sheweth :-

The Respondents submit as under:-

**Preliminary Objections**

1. That the appellant has got no cause of action/locus standi.
2. That the instant Service Appeal is badly time-barred. Hence is liable to be dismissed.
3. That no departmental appeal has been filed by the appellant.
4. That the instant appeal is liable to be dismissed for mis joinder & non-joinder of the necessary parties to the present appeal.
5. That the appellant is not an aggrieved person within the meaning of Article 212 of the constitution of Islamic Republic of Pakistan 1973.
6. That the appellant has filed the instant appeal on mala-fide intentions just to put extra ordinary pressure on the Respondents for the grant of illegal & even unauthorized service benefits.
7. That the appellant is estopped by his own conduct to file the instant appeal.
8. That the instant Service Appeal is not maintainable in its present form.
9. That the appellant has been treated as per laws, rules & relevant policy in the instant case.

**ON FACTS:**

1. Needs no comments being pertains to the service record of the appellant.

- 2 Correct, with the explanation that all the rules and policies framed are duly observed by the respondents.
- 3 Incorrect on the grounds that the appellant could not be promoted to the post in question, being Junior to his colleagues in the seniority list of PSHT District Nowshera.
- 4 Correct, with the explanation that all the advertisements made by the respondents are just according to rules and policy.
- 5 Incorrect, hence denied on the grounds that more than 100 in-service teachers have been duly promoted to SST from various cadres according to their proportionate quota.
- 6 Partially Correct, with the explanation that the W.P No.1495-P/2017 under case titled Naveed Khan Vs Govt; of KPK & others, has been disposed of by the Honorable Peshawar High Court vide order dated 09-01-2018 attached as **Annexure-A** with the declaration that the respondent department has not committed any illegality or irregularity in promotion however the petitioners were allowed to be at liberty to approach proper forum if so advised.
- 7 Incorrect on the grounds that the appellant has been promoted as SST BPS-16 post in year of 2019 instead of 2016 as per his service record in the Department.
- 8 Incorrect hence, denied as reply to this para has been given in the above paras.
- 9 Incorrect & misleading on the grounds that no Departmental appeal against the promotion order in the year 2018-19 has been filed by the appellant to the appellate authority under the Rules, hence got final & liable to be maintained. Therefore, the appeal in hand is liable to be dismissed on the following grounds inter alia:-

**ON GROUNDS.**

- A. **Incorrect & not admitted.** The act of the Respondent Department is legal & liable to be maintained in view of the above made submission in the present reply.
- B. **Incorrect & not admitted,** the appellant has been treated as per Law, Rules & policy by the Department; hence, the stance of the appellant is liable to be rejected.
- C. **Incorrect & not admitted.** The stance of the appellant is illegal & liable to be rejected in view of the reply submitted in para-3 of the present reply.
- D. **Incorrect & not admitted.** The act of the Department is legal & according to policy.
- E. **Incorrect & not admitted.** As all the cadres have been duly promoted to SST in year 2016-17 according to their respective shares.

IN THE PESHAWAR HIGH COURT PESHAWAR

In Ref: to WP No. 1495 P /2017.



- 1) Naveed Khan S/O Pervaiz Khan R/O Dagbesood (Nowshera) presently working and posted as Senior Certified Teacher (SCT) at Government Shaeed Ali Abbas High School Dagbesood (Nowshera).
- 2) Dalil Khaul S/O Mutawal Khan R/O Akora Khattak (Nowshera) presently working and posted as Senior Certified Teacher (SCT) at Government Centennial Model High School Akora Khattak (Nowshera).
- 3) Rayaz Muhammad S/O Faqir Muhammad R/O Akbar Pura (Nowshera) working and posted as Senior primary School Teacher (SPST) Ali Shah (Pabbi/Nowshera).
- 4) Zain Ullah S/O Zardullah Khan R/O Dagbasood (Nowshera) working and posted as Senior primary School Teacher (SPST) at Government No. 5 Dagbasood (Pabbi/Nowshera).
- 5) Naseer Muhammad S/O Faqir Muhammad R/O working and posted as Senior primary School Teacher (SPST) at Government Primary School No. 1 Pabbi (Nowshera).
- 6) Asif Khan S/O Rahmani Gul R/O Aman Kot (Pabbi) presently working and posted as Senior primary School Teacher (SPST) at Government Primary School Anankot (Nowshera).
- 7) Amin-ur-Rehman S/O Khan Zada R/O Resalpur (Nowshera) presently working and posted as Senior primary School Teacher (SPST) at Government Primary School Barakabad (Nowshera).
- 8) Amir Muhammad S/O Adil Muhammad R/O Azakhel Payan, Nowshera, presently working and posted as Senior primary School Teacher (SPST) at Government Primary School No. 1 Azakhel Payan (Nowshera).

*Handwritten signature/initials*

PETITIONERS.

VERSUS

1. Secretary to the government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Civil Secretariat Peshawar.
2. Director, Elementary & Secondary Education Department, Province of Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Male) Nowshera.....

FILED TODAY

Deputy Registrar

08 APR 2017

RESPONDENTS.

ATTESTED

EXAMINER

Peshawar High Court

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973 AS AMENDED UP-TO DATE 15 JAN 2018

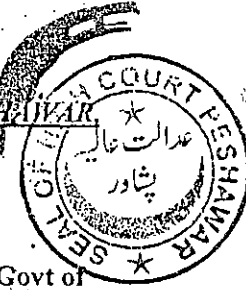
WP 1495P2017

Judgment Sheet

IN THE PESHAWAR HIGH COURT, PESHAWAR  
JUDICIAL DEPARTMENT.

Writ Petition No. 1495-P/2017

Naveed Khan etc..vs...Secretary to Govt of  
Khyber Pakhtunkhwa Elementary & Secondary  
Education etc.



JUDGMENT

Date of hearing.....09.01.2018.....

Petitioner(s) by Mr. Muhammad Usman Khan Turlandi,  
Advocate.

Respondent (s) by Mr. Muhammad Riaz Khan, AAG.

\*\*\*\*\*

ROOH-UL-AMIN KHAN, J:- By invoking the constitutional jurisdiction of this Court under Article-199 of the Constitution of Islamic Republic of Pakistan, 1973, petitioner seek their promotion to the post of SST (BPS-16) on the basis of seniority cum fitness against 75% quota reserved for promotion.

2. According to the contents of the writ petition, the petitioners joined the services in the respondents department and were lastly promoted to the posts of Senior Certified Teacher (SCT) and Senior Primary School Teacher ( SPST) respectively and are performing their duties as such. The respondents in utter violation of Notification No. SO (PE)4-5/SSRC/Meeting/2013/Teaching

**ATTESTED**  
EXAMINER  
Peshawar High Court  
13 JAN 2018

*For the Petitioner*

Cadre, dated 24.7.2014, whereby 75% quota for the posts of SST ( BPS-16) has been served /sanctioned for promotion on the basis of seniority cum fitness and 25% for initial recruitment, advertised 62 vacant posts of Senior Science Teacher ( BPS-16) to be filled up through fresh / initial recruitment, without reserving a single vacancy for promotion amongst the Senior Certified Teachers or Senior Primary School Teachers.

3. Learned AAG contended that the respondents department has already considered the case of petitioners for promotion under their specified 75% quota, however they were lacking the requisite qualification, therefore, could not be considered. He pointed out that the petitioner No. 1 and 2 have qualified BSc examination in Math-A, Maths-B and Statistics and do not fulfill the criteria. Similarly petitioner No.7 has passed the BA/BSc in third division which is also does not come under the criteria of 75% quota. He stated that candidate who improved his qualification and got eligibility and fitness in accordance with the criteria shall be considered for promotion to the post of SST in the next meeting of Department Promotion Committee.

4. It is manifest from the comments that the respondents have not denied the quota of promotion @ 75% however the petitioners were considered and denied to be

**ATTESTED**  
 EXAMINER  
 Peshawar High Court  
 13 JAN 2018

36 M<sup>3</sup> 1

considered for promotion on the ground of lacking the requisite qualification and not fulfilling the criteria, hence the department has not committed any illegality or irregularity.

5. The contention of learned counsel for petitioners that the petitioners have improved their qualification, therefore, they be considered for promotion w.e.f the date wherefrom their other colleagues have been considered, is unpersuasive for the reasons that such a writ cannot be issued under Article-199 of the Constitution of Islamic Republic of Pakistan, 1973, as Article 212 of the Constitution of 1973 debar this Court to interfere in the matter pertaining to terms and conditions of a civil servant.

6. For the reasons given hereinabove, the instant petition is disposed of accordingly. However, the petitioners would be at liberty to approach the proper forum, if so advised at the relevant time.

Announced on;  
09<sup>th</sup> of January, 2018  
\*Zarshad\*

*Signature*



JUDGE  
*Signature*  
JUDGE

No. 6284  
Date of Presentation of Application 10/1/18  
No of Pages 10  
Copying Fee (DB) Mr. Justice Rosh Ul Amin Khan & Mr. Justice Qalandar Ali Khan  
Urgent Fee  
Total 40/-  
Date of Preparation of Copy 13/1/18  
Date of Delivery of Copy 13/1/18  
Received By *Signature*

CERTIFIED TO BE TRUE COPY  
Examiner  
Peshawar High Court, Peshawar  
Authorized Under Article 6,7 of  
The Oath-taking-Shahadat Order 1984  
13 JAN 2018



(18)

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

☎ 0923-9220228 ☎ 0923-9220228 ✉ emisnowshehra@yahoo.com

**POSTING ORDER**

In pursuance of the Notification Issued by the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide Endst: No. 2223-24/File No.2/ Promotion SST (M) Deptt; Promotion dated Peshawar the 14-05-2018, the following newly promoted SST Maths/Phy) BPS-16 (Rs. 18910-1520-64510) are hereby posted in the schools noted against each, on the terms and conditions given below in the interest of public service with immediate effect.

S#	S.L. #	Name & Designation	Present School	Place of Posting	Remarks
<b>1. Promotion of SPST to SST (/Maths Phy) BPS-16</b>					
1	1043	Zainullah Khan	GPS No.5 Dag Besud	GHSS, Dak Ismail Khel	AVP
2	1047	Ameer Muhammad Khan	GPS No.1 Aza Khel Payan	GHSS No.2 NSR Cantt	AVP

**Terms & Conditions:**

1. They will be on probation for a period of one year extendable for another one year.
  2. They will be governed by such rules and regulation as may be issued from time to time by the Government.
  3. Their services can be terminated at any time; in case their performance is found unsatisfactory during probation period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
  4. The Principals / Head Master / Drawing & Disbursing Officers should checked their original documents (Academics + Professional) before handing over charge.
  5. The Principals / Head Masters / Drawing & Disbursing Officers are required to submit their necessary documents for verification to District Education Officer (Male), Nowshera along with original payee receipt.
  6. The Principals / Head Masters / Drawing & Disbursing Officers should not release their pay in BPS-16 until and unless their necessary documents are verified from the Universities concerned. During the verification process, if any Degree / Certificate is found fake / bogus, their promotion shall stand cancelled.
  7. The District Education Officer (Male), Nowshera will issue Clearness Certificate after the verification process.
  8. Charge Report should be submitted to all concerned.
  9. Their Inter-Se-Seniority on lower post will remain intact.
  10. No TA / DA is allowed for joining their new post.
  11. They will give an undertaking to be recorded in their Service Books to the effect that if any overpayment is made to them in light of this order will be recovered and if anyone is wrongly promoted he shall be reversed.
1. No. TA/DA is allowed.

(Fayaz Hussain)  
District Education Office (Male)  
Nowshera

Endst: No. 10311-21 /DEO (M) NSR/EA-S/Prqm: of SSTs. Dated Nowshera the, 27/08/2018.

Copy of the above is forwarded for information to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar w/r to Notification No. quoted above.
2. District Accounts Officer, Nowshera.
3. Deputy District Education Officer (Male), Nowshera.
4. District Monitoring Officer (IMU) Nowshera.
5. Sub Divisional Education Officer (Male), Nowshera/Pabbi.
6. Assistant District Education Officer - Establishment (Primary & Secondary), Local office.
7. Superintendent - Establishment (Primary & Secondary), Local office.
8. Dealing Assistant - Establishment (Primary & Secondary), Local office
9. Assistant Programmer D-EMIS, local office.
10. Accountant, Local office.
11. Officers concerned.
12. Master File.

District Education Officer (Male)  
Nowshera



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

☎ 0923-9220228 ☎ 0923-9220228 ✉ [emisnowshehra@yahoo.com](mailto:emisnowshehra@yahoo.com)

**POSTING ORDER**

In pursuance of the Notification issued by the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide Endst: No. 1742-47/File No.2/ Promotion SST B-16 dated: 08-06-2018, the following newly promoted SST (Math's/Phy) BPS-16 (Rs. 18910-1520-64510) are hereby posted in the schools noted against each, on the terms and conditions given below in the interest of public service with immediate effect.

S#	S.L.#	Name & Designation	Present School	Place of Posting	Remarks
<b>1. Promotion of SPST to SST (/Math's Phy) BPS-16</b>					
1	1050	Asif Khan	GPS Aman Kot	GHS Banda Sheikh Ismail	AVP
2	1092	Riaz Muhammad	GPS Ali Shah	GHS Marhati Banda	AVP

**Terms & Conditions:**

1. They will be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulation as may be issued from time to time by the Government.
3. Their services can be terminated at any time; in case their performance is found unsatisfactory during probation period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. The Principals / Head Master / Drawing & Disbursing Officers should checked their original documents (Academics + Professional) before handing over charge.
5. The Principals / Head Masters / Drawing & Disbursing Officers are required to submit their necessary documents for verification to District Education Officer (Male), Nowshera along with original payee receipt.
6. The Principals / Head Masters / Drawing & Disbursing Officers should not release their pay in BPS-16 until and unless their necessary documents are verified from the Universities concerned. During the verification process, if any Degree / Certificate is found fake / bogus, their promotion shall stand cancelled.
7. The District Education Officer (Male), Nowshera will issue Clearness Certificate after the verification process.
8. **Charge Report should be submitted to all concerned.**
9. Their Inter-Se-Seniority on lower post will remain intact.
10. No TA / DA is allowed for joining their new post.
11. They will give an undertaking to be recorded in their Service Books to the effect that if any overpayment is made to them in light of this order will be recovered and if anyone is wrongly promoted he shall be reversed.
12. **No. TA/DA is allowed.**

(Fayaz Hussain)

District Education Office (Male)  
Nowshera

**Endst: No. 3089-3106/DEO (M) NSR/EA-S/Prom: of SSTs. Dated Nowshera the, 21/02/2019.**

Copy of the above is forwarded for information to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar w/r to Notification No. quoted above.
2. District Accounts Officer, Nowshera.
3. Deputy District Education Officer (Male), Nowshera.
4. District Monitoring Officer (IMU) Nowshera.
5. Sub Divisional Education Officer (Male), Nowshera/Pabbi.
6. Assistant District Education Officer - Establishment (Primary & Secondary), Local office.
7. Superintendent - Establishment (Primary & Secondary), Local office.
8. Dealing Assistant - Establishment (Primary & Secondary), Local office.
9. Assistant Programmer D-EMIS, local office.
10. Accountant, Local office.
11. Officers concerned.
12. Master File.

District Education Officer (Male)  
Nowshera





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

SCT

☎ 0923-9220228 ☎ 0923-9220228 ✉ emisnowshehra@yahoo.com

**POSTING ORDER**

In pursuance of the Notification issued by the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide Endst: No. 1731-37/File No.2/ Promotion SST B-16 dated Peshawar the 25.07.2017, the following newly promoted SST (General), SST (Phy/Maths) and SST (Bio/Chem) BPS-16 (Rs. 18910-1520-64510) are hereby posted in the schools noted against each, on the terms and conditions given below in the interest of public service with immediate effect.

S#	S.L. #	Name & Designation	Present School	Place of Posting	Remarks
<b>A. SST (Bio/Chem)</b>					
<b>1. Promotion of Sr. CT / CT to SST (Bio/Chem) BPS-16</b>					
01	510	Saifullah Khan CT	GHS, Khawrai	GHS, Adamzai	A.V.P.
<b>2. Promotion of Sr. AT / AT to SST (Bio/Chem) BPS-16</b>					
1	105	Fazal Jawad AT	GMS, Khush Muqam	GHS, Aza Khel Payan	A.V.P.
<b>B. SST (Phy/Maths)</b>					
<b>3. Promotion of Sr. CT / CT to SST (Phy/Maths) BPS-16</b>					
1	228	Dalil Khan SCT	GCMHS, Akora Khattak	GHS, Jehangira Road	AVP
2	272	Naveed Khan SCT	GHS, Dag Besud	GHS, Pashtoon Garhi	AVP
<b>2. Promotion of PSHT / SPST / PST to SST (Phy/Maths) BPS-16</b>					
1	977	Ahmad Khan	GPS No.2 Shaidu	GHSS, Shaidu	AVP
<b>C. SST (General)</b>					
<b>1. Promotion of Sr. CT / CT to SST (General)</b>					
1.	66	Shujaat Ali Khan SCT	GHS, LG Aman Garh	GHS, Aman Garh	AVP
2.	131	Jehangir Khan SCT	GHSS, NSR Kalan	GHSS, NSR Kalan	
3.	150	Muhammad Tariq SCT	GHSS, NSR Kalan	GHSS, NSR Kalan	AVP
4.	155	Abdur Rashid Khan SCT	GHS, No.1 NSR Cantt	GMS, Meraji Bala	AVP
5.	160	Tayyab Ali Shah SCT	GHSS, Shaidu	GHS, Baghban Pura	AVP
6.	161	Aurang Zeb SCT	GHS, Pabbi	GHS, Pabbi	
7.	162	Sakawat Shah SCT	GHS, Pabbi	GHS, Pabbi	
8.	163	Saifullah SCT	GHS, Dagi Banda	GHS, Dagi Banda	
9.	164	Muhammad Ali SCT	GHS, Mulla Killi	GHS, Sheikhan	AVP
10.	165	Rahmat Ali SCT	GHS, Aza Khel Bala	GHS, Aza Khel Payan	AVP
11.	166	Shamsul Had SCT	GHS, Marhati Banda	GMS, Meshak	AVP
<b>2. Promotion of PSHT / SPST / PST to SST (General)</b>					
1.	221	Ashiq Ali	GPS, Tandel Koroona	GMS, Sadiq Abad	AVP
2.	289	Asad Gul	GPS, Baitul Chareeb	GHS, Dherri Kati Khel	AVP
3.	368	Zia Ul Haq	GPS, Gul Rehman Killi	GHS, Jaroba	AVP
4.	413	Shafiullah	GPS, No.1 Jabba Khushk	GHS, Ali Baig	AVP
5.	422	Alam Zeb	GPS, No.1 Walai	GHS, Zara Miana	AVP
6.	424	Muhammad Hafiz	GPS, No.2 Tangi Khattak	GMS, Sado Khel	AVP
7.	426	Nisar Muhammad	GPS, No.1 Hamza Rashka	GHSS, Pashtoon Garhi	AVP
8.	429	Ijaz Muhammad	GPS, Fazli Rahim Koroona	GHS, Zando Banda	AVP
<b>3. Promotion of Sr. DM / DM to SST (General) BPS-16</b>					

**Promotion of SCT/CT/SDM/SAT/STT/Sr. Qari/PST/SPST/PSHT to SST (BPS-16)**

S#	S.L. #	Name & Designation	Present School	Place of Posting	Remarks
<b>Promotion of Sr. AT / AT to SST (General) BPS-16</b>					
01	26	Nisar Ul Haq SAT	GHS, Spin Khak	GHS, Bakhtai	A.V.P
<b>4. Promotion of Sr. TT / TT to SST (General) BPS-16</b>					
01	09	Nadeem Khan STT	GHS, Badrashi NSR	GHS, Badrashi NSR	A.V.P
<b>5. Promotion of Sr. Qari / Qari to SST (General) BPS-16</b>					
01	14	Atta Ur Rehman, SQari	GHSS, Rashakai.	GHSS, Rashakai	A.V.P

**Terms & Conditions:**

1. They will be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulation as may be issued from time to time by the Government.
3. Their services can be terminated at any time; in case their performance is found unsatisfactory during probation period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. The Principals / Head Master / Drawing & Disbursing Officers should checked their original documents (Academics + Professional) before handing over charge.
5. The Principals / Head Masters / Drawing & Disbursing Officers are required to submit their necessary documents for verification to District Education Officer (Male), Nowshera along with original payee receipt.
6. The Principals / Head Masters / Drawing & Disbursing Officers should not release their pay in BPS-16 until and unless their necessary documents are verified from the Universities concerned. During the verification process, if any Degree / Certificate is found fake / bogus, their promotion shall stand cancelled.
7. The District Education Officer (Male), Nowshera will issue Clearness Certificate after the verification process.
8. Charge Report should be submitted to all concerned.
9. Their Inter-Se-Seniority on lower post will remain intact.
10. No TA / DA is allowed for joining their new post.
11. They will give an undertaking to be recorded in their Service Books to the effect that if any overpayment is made to them in light of this order will be recovered and if anyone is wrongly promoted he shall be reversed.

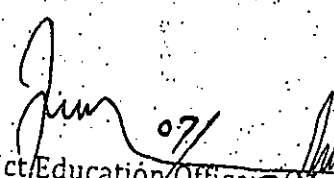
<b>Consequential Transfer.</b>				
1	Zia Ur Rahman SST (G)	GHS, Dagi Banda	GHS, Kandi Taza Din	A.V.P
2	Hameed Gul SST (G)	GHS, Bakhtai	GSSHSS, Dak Ismail Khel	A.V.P

1. No. TA/DA is allowed.

(Fayaz Hussain)  
District Education Office (Male)  
Nowshera

Endst: No. 12021-51/DEO (M) NSR/EA-S/Prom: of SSTs. Dated Nowshera the, 07 / 08 / 2017.

- Copy of the above is forwarded for information to the:-
1. Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar w/r to Notification No. quoted above.
  2. District Accounts Officer, Nowshera.
  3. Deputy District Education Officer (Male), Nowshera.
  4. District Monitoring Officer (IMU) Nowshera.
  5. Sub Divisional Education Officer (Male), Nowshera.
  6. Assistant District Education Officer - Establishment (Primary & Secondary), Local office.
  7. Superintendent - Establishment (Primary & Secondary), Local office.
  8. Dealing Assistant - Establishment (Primary & Secondary), Local office.
  9. Assistant Programmer D-EMIS, local office.
  10. Accountant, Local office.
  11. Officers concerned.
  12. Master File.

  
 District Education Officer (Male)

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR

Service Appeal No. 9147 2020

Asif Khan.....Appellant

Versus

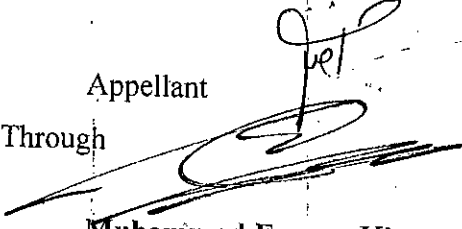
Secretary to Govt of K.P. E&S Department and others ..... Respondents

INDEX

S.No.	Description of documents.		Pages.
1)	Memo of appeal with affidavit.		1-6
2)	Addresses of the parties.		7
3)	Copy of notification.	A	8-14
4)	Copy of detailed list showing the school wise vacancies and advertisement.	B-C	15-26
5)	Copy of writ petition and order	D	27-30
6)	Copies of educational documents.	E	31-34
7)	Copies of applications.		35
8)	Wakalatnama.		36

Appellant

Through

  
**Muhammad Farooq Khan**  
Advocate High Court  
District Courts Nowshera

Dated: 60.07.2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR

Service Appeal No. 9147/2020

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 6050

Dated 6-7-2020

Asif Khan s/o Rahmani Gul  
R/o Aman Kot (Pabbi)  
Presently working and posted as Secondary School Teacher (SST) at Govt.  
High School Banda Sheikh Ismail, (Nowshera).....Appellant  
Versus

- 1) Secretary to Government of Khyber Pakhtunkhwa Elementary and  
Secondary Education Department, Civil Secretariat, Peshawar.
- 2) Director Elementary & Secondary Education Department, KPK,  
Peshawar.
- 3) District Education Officer (Male) Nowshera..... Respondents

**APPEAL U/S 4 OF THE SERVICES  
TRIBUNAL ACT, 1974.**

*Respectfully Sheweth;*

- 1) That the appellant had joined the services in education department  
and promoted to the post of Secondary School Teacher (SST) and  
lastly was posted as such.
- 2) That the respondent department in consultation with the  
Establishment and Finance Department has passed notification  
No.SO(PE)4-5/SSRC/Meeting/2013 Teaching Cadre dated Peshawar  
the 24<sup>th</sup> July, 2014 whereby 75% quota for the posts of Secondary  
School Teacher (BPS-16) has been reserved/ sanctioned for  
promotion on the basis of seniority-cum-fitness and 25% for initial  
recruitment. (Copy of notification is Annexure "A").

**Filed to-day**

*[Signature]*  
Registrar  
6/7/2020

**Re-submitted to-day  
and filed.**

*[Signature]*  
Registrar  
10/8/2020

- 3) That the appellant being Senior Primary School Teacher (SPST-BPS-14) is standing at the top of seniority list having spotless service career and was highly eligible and most deserving teacher for his due legitimate right of promotion as Secondary School Teacher (BPS-16).
- 4) That there was confirmed vacancies for 62 post of senior science teacher (BPS-16) and accordingly an advertisement was floated in the daily newspaper, wherein applications for fresh recruitment were invited from the suitable candidates/ citizens of the KPK province and the cut date of submission of applications was given as 30.09.2016. (Copy of the detailed list showing the school-wise vacancies and advertisement for recruitment are Annexure "B and C" respectively).
- 5) That the advertisement (Annexure "C") if seen at a glance, it transpires that the whole number of vacancies are/ were to be filled through initial recruitment and not a single vacancy was kept for promotion amongst the senior certified teachers or senior primary school teachers.
- 6) That now against said impugned appointment appellant filed a W.P.No.1495-P/2017 in which Hon'ble High Court directed the appellant to approach proper forum. (Copy of writ petition along with order is annexed as "D").
- 7) That now in 2019 the appellant has been promoted, but not from 2016 as the appellant was eligible for the said promotion according to policy and rules.
- 8) That due to the illegal act the appellant become junior to the promoted and fresh appointed teachers in 2016 and also deprived from the financial rights.

- 9) That feeling aggrieved, the appellants in the given circumstances while having no other adequate remedy is constrained to approach this Hon'ble Tribunal for the redressal of his grievances on the following grounds inter alia;

GROUNDS:

- A) That notification (Annexure "A") is the clear cut and well transparent policy being mandatory in nature, properly formulated and promulgated by the respondents themselves and as such the respondents are/ were under their obligatory duty to act upon their own policy and the whole number of 62 vacancies should have been filled accordingly wherein 75% quota is/ was the legal rights of incumbents/ serving employees on the basis of seniority-cum-fitness and the rest of 25% quota was to be determined for fresh/ initial recruitment. The respondents purposely and illegally have amalgamated all the sets of quotas just to accommodate their own kit and kin/ blue eyed and the appellant was made scapegoat.
- B) That discrimination in services as observed by the respondents in the matter of depriving the appellant from his due/ legal right of promotion is highly deplorable and condemnable, being unlawful, unconstitutional, without lawful authority, without jurisdiction, against the norms and natural justice and equity hence to be declared as such.
- C) That in 2016 appellant having the prescribed qualification for promotion as per policy and rules of respondents.
- D) That it is constitutional right of the appellant to be promoted and Science Teacher were deprived
- E) That in the General D.P.C. in 31.01.2017 that Arts Teachers were promoted and Science Teachers were deprived.

4

- F) That the appellant being deserving and eligible candidate for his due promotion to the post of Secondary School Teacher (BPS-16) while no adverse remarks whatsoever has ever been assigned to him from any quarter and thus valuable rights have been accrued to him and such rights could not be taken away in an arbitrary and fanciful manner.
- G) That the appellant has not been dealt with in accordance with law and has illegally been put to, financial trouble and hardship in the prevailing circumstances of dearness, scarcity and uncertainty promotion policy, shall be deemed to have been promoted to the post of Secondary School Teacher (BPS-16) retrospectively being legally entitled as such.
- H) That there is sheer discrimination in the matter of promotion of the appellant to the post of Secondary School Teacher (BPS-16) and the respondents have acted according to his own sweet will, whims, wishes, discretion and innovation.
- I) That the appellant has not been dealt with in accordance with law and equity and the appellant has been made as scapegoat who has been penalized for no fault on his part.
- J) That the respondents have exceeded their powers and jurisdiction by enjoying their own innovation and monopoly, creating problems for the entire family of the appellant, by giving him discriminative treatment which amounts to deprive the family of the appellant including his school going children from their breathing and livelihood which is unwarranted by the law of the land.
- K) That valuable right was accrued to the appellant whereas their fundamental valuable rights have been encroached by the respondents on their personal whims and wishes and such

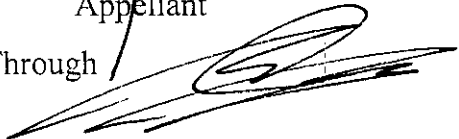
encroachment is hit by the command of the Constitution of the Islamic Republic of Pakistan, 1973.

- L) That the respondents have transgressed their powers and the appellant has been denied his due fundamental rights of being treated fairly, and equally in accordance with law whereas the appellant is/ was highly, legally eligible on the basis of seniority-cum-fitness and that too there are sufficient sanctioned vacant posts are/ were available and thus valuable rights have been accrued to the appellant which have taken legal effect and such legal rights could not be taken away with a single stroke of pen.
- M) That Islamic State is under obligation to establish a society which is free from exploitation wherein social and economic justice is guaranteed to its citizens. (2005 SCMR 100 (c & d).
- N) That further submissions will be advanced with the kind permission of this august court at the time of hearing the appeal at the bar.

It view of above facts, it is, therefore, humbly prayed that on acceptance of this appeal, appellant may please be promoted from the year 2016 with all financial back benefits and seniority enabling the appellant to enjoy the protection of law and to be treated in accordance with law, just to meet the ends of justice.

Any other remedy if available may also be extended in favour of appellant to meet the ends of justice.

  
Appellant

Through 

**Muhammad Farooq Khan**  
Advocate High Court  
District Courts Nowshera.



6

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL  
PESHAWAR.

Service Appeal No. \_\_\_\_\_/2020

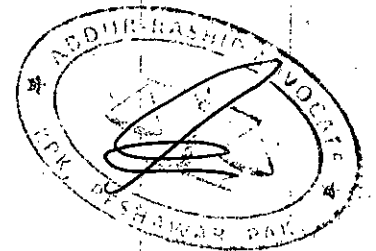
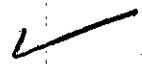
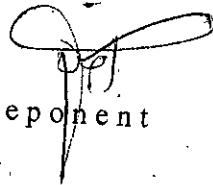
Asif Khan .....Appellant  
Versus

Secretary to Govt of K.P. E&S Department and others ..... Respondents

AFFIDAVIT

I, Asif Khan s/o Rahmani Gul R/o Aman Kot (Pabbi) Presently working and posted as Secondary School Teacher (SST) at Govt. High School Banda Sheikh Ismail, (Nowshera) do hereby affirm and declare on oath that the contents of the **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Deponent



BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL  
PESHAWAR.

Service Appeal No. \_\_\_\_\_/2020

Asif Khan.....Appellant  
Versus  
Secretary to Govt of K.P. E&S Department and others ..... Respondents

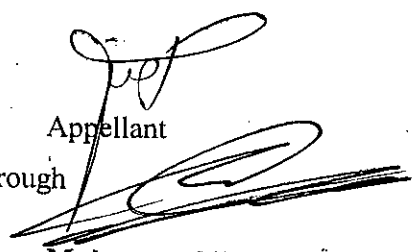
ADDRESSES OF THE PARTIES

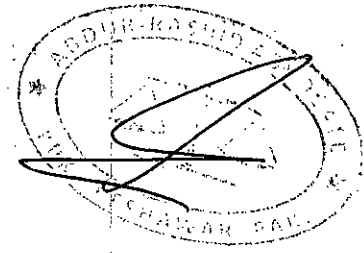
APPELLANT:

Asif Khan s/o Rahmani Gul  
R/o Aman Kot (Pabbi)  
Presently working and posted as Secondary School Teacher (SST) at Govt.  
High School Banda Sheikh Ismail, (Nowshera)

RESPONDENTS:

- 1) Secretary to Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department, Civil Secretariat, Peshawar.
- 2) Director Elementary & Secondary Education Department, KPK, Peshawar.
- 3) District Education Officer (Male) Nowshera

Appellant  
Through  
  
**Muhammad Farooq Khan**  
Advocate High Court  
District Courts Nowshera.



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT



Peshawar, dated the 24<sup>th</sup> July, 2014.

32

NOTIFICATION

No.SO(PE)4-5/SSRC/Meeting/2013/Teaching Cadre:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notifications No.SO(G)S&LD/1-28/2003/Vol-II dated, 09-04-2004, Notification No.SO(G)S&L/1-69/06/Vol-1/DPE/LIB dated, 13-11-2007, and Notification No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre, dated, 13.11.2012, the following further amendments shall be made, namely:

ATTACHED

AMENDMENTS

In the Appendix,-

- (i) Serial No. 1 shall be renumbered as 1A and before Serial No. 1B, as so renumbered, the following new entries shall be inserted in respective columns, namely:

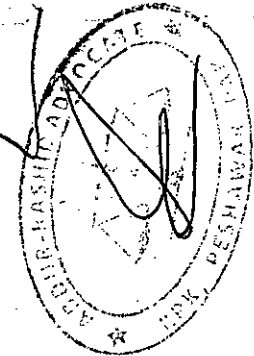
1	2	3	4	5
1A	Subject Specialist (BPS-17)	i. At least second class Master's Degree or four years BS Degree in the relevant subject; and  ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or MA Education or equivalent qualification from a recognized University.	23 to 35 years	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-16), with at least five years service as such and having qualification mentioned in column No. 3.  Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

(1)

Annexure (A) (38)

69

IA	Director Physical Education (BPS-17)	At least second-class Master's Degree in Physical Education from a recognized University.	22-35 years	recruitment, and (b) fifty percent by initial recrui  (a) Fifty percent by promotion, c seniority-cum-fitness, from a Physical Education Teachers (c at least five years service as S Education Teacher and Physi Teacher and having mentioned in column No. 3:  Provided that if no s is available from amongst S Education Teachers for prom post shall be filled by prom basis of seniority-cum-f amongst the Physical Educa with at least five years servi having qualification mention No. 3;  Note:- If no suitable candido in the relevant cadres of the ,the post falling in their pr shall be filled by initial recrui  (b) fifty percent by initial recrui
----	--------------------------------------	-------------------------------------------------------------------------------------------	-------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------



30

RECEIVED  
1992  
APR 11

(ii) against Serial No. 1B, as so numbered, for the existing entries, the following shall be substituted, in respect of the entries, namely:

1	2	3	4	5
1B.	Secondary School Teacher (BPS-16)	<p>I. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology), Or (b) (Physics, Maths "A" or "B" or Statistics) Or (c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p>and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or MA Education or equivalent qualifications from a recognized University.</p>	21 to 35 years.	<p>Seventy Five per cent by promotion basis of seniority-cum-fitness, in the district concerned in the following:</p> <p>(a) forty per cent from amongst the Certified Teachers (BPS-16), with five years service as Senior Teacher and Certified Teacher having qualification mentioned in column No. 3:</p> <p>Provided that if no candidate is available from Senior Certified Teachers for promotion then the post shall be filled by promotion on the basis of seniority-cum-fitness from amongst Certified Teachers at least five years service as Senior Teachers having qualification mentioned in column No. 3;</p> <p>(b) four per cent from amongst the Drawing Masters (BPS-16), with five years service as Senior Masters and Drawing Masters having qualification mentioned in column No. 3:</p>

10

Handwritten signature and stamp.

Handwritten mark or signature.

Handwritten number 11 in a circle.

--	--	--

Provided that if no suitable candidate is available from or Senior Drawing Masters for promotion then the post shall be filled by promotion on the basis of seniority-cum-fitness from amongst Drawing Masters having at least five years service as such having qualification mentioned in column No. 3;

(c) four per cent from amongst the Arabic Teachers(BPS-16), with a five years service as Senior Teachers and Arabic Teachers having qualification mentioned in column No. 3;

Provided that if no suitable candidate is available from or Senior Arabic Teachers for promotion, then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers having at least five years service as such having qualification mentioned in column No. 3;

(d) four per cent from amongst the Theology Teachers(BPS-16), with a five years service as Senior Theology Teachers and Theology Teachers having qualification mentioned in column

12

--	--	--

Provided that if no suitable candidate is available from amongst Senior Theology Teachers for promotion then the post shall be filled by promotion on the basis of seniority-cum-fitness from amongst Theology Teachers with a least five years service as such and having qualification mentioned in column No. 3;

(e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No. 3:

Provided that if no suitable candidate is available from amongst the Senior Qaris then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Qaris with at least five years service as such and having qualification mentioned in column No. 3;

(f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3:

Provided that if no suitable candidate is available from amongst

13

--	--	--	--	--	--

Primary School Head Teachers promotion then the post shall be filled promotion, on the basis of seniority-cum fitness, from amongst Senior Primary School Teachers with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned column No. 3:

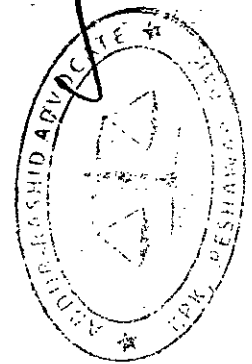
— Provided further that if no suitable candidate is available from among Senior Primary School Teachers promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as such and having qualification mentioned column No. 3; and

(ii) twenty Five percent by initial recruitment.

**Note:**

- I. If no suitable candidate is available the relevant cadre of the above teachers the post falling in their promotion quota shall be filled by initial recruitment.
- II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled promotion or initial recruitment, each need basis separately.

77





(Public)

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUN  
ELEMENTARY & SECONDARY EDUCATION DEPART.

Endst.: of even No. & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officer (M&F) in Khyber Pakhtunkhwa.
14. All District Account Officer in Khyber Pakhtunkhwa.
15. All Agency Education Officer in FATA.
16. All Agency Account Officer in FATA.
17. PS to Governor Khyber Pakhtunkhwa. Peshawar.
18. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
19. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
20. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
21. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.
22. Master file

*[Handwritten signature]*

*[Handwritten mark]*

*[Handwritten signature]*  
(AMIN KHAN MOMAND)  
SECTION OFFICER (PRIMARY)

VT's Admitt  
for 155 MAJ 18 Phy Post  
Anal 32 Post Bioschem

اللہ تعالیٰ کے لیے ہیں سب سے بڑے شکر گزار

# DAIYI MASHRIQ PESHAWAR

پشاور

روزنامہ

پشاور

ABC CERTIFIED

پشاور اسلام آباد سیکرٹریٹ

22-2015-06-1437

19

## پشاور ایئر فورس کالج میں داخلہ کی اطلاع

www.dailymashriq.com.pk

(B)

پشاور ایئر فورس کالج میں داخلہ کی اطلاع  
 ایئر فورس کالج پشاور میں داخلہ کی اطلاع  
 ایئر فورس کالج پشاور میں داخلہ کی اطلاع  
 ایئر فورس کالج پشاور میں داخلہ کی اطلاع

نمبر	تعداد	تعداد	تعداد
1	1	1	1
2	2	2	2
3	3	3	3

نمبر	تعداد	تعداد	تعداد
1	1	1	1
2	2	2	2
3	3	3	3

ایئر فورس کالج پشاور میں داخلہ کی اطلاع  
 ایئر فورس کالج پشاور میں داخلہ کی اطلاع  
 ایئر فورس کالج پشاور میں داخلہ کی اطلاع  
 ایئر فورس کالج پشاور میں داخلہ کی اطلاع

ATTESTED



## OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) NOWSHERA.

☎ 0923-9220228 ☎ 0923-9220228 ✉ emisnowshehra@yahoo.com

### POSTING ORDER.

In pursuance of the Notification issued by the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide Endst: No. 1742-47/File No.2/ Promotion SST B-16 dated: 08-06-2018, the following newly promoted SST Math's/Phy) BPS-16 (Rs. 18910-1520-64510) are hereby posted in the schools noted against each, on the terms and conditions given below in the interest of public service with immediate effect.

S#	S.L. #	Name & Designation	Present School	Place of Posting	Remarks
<b>1. Promotion of SPST to SST (/Math's Phy) BPS-16</b>					
1	1050	Asif Khan	GPS Aman Kot	GHS Banda Sheikh Ismail	AVP
2	1092	Riaz Muhammad	GPS Ali Shah	GHS Marhati Banda	AVP

### Terms & Conditions:

1. They will be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulation as may be issued from time to time by the Government.
3. Their services can be terminated at any time; in case their performance is found unsatisfactory during probation period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. The Principals / Head Master / Drawing & Disbursing Officers should checked their original documents (Academics + Professional) before handing over charge.
5. The Principals / Head Masters. / Drawing & Disbursing Officers are required to submit their necessary documents for verification to District Education Officer (Male), Nowshera along with original payee receipt.
6. The Principals / Head Masters / Drawing & Disbursing Officers should not release their pay in BPS-16 until and unless their necessary documents are verified from the Universities concerned. During the verification process, if any Degree / Certificate is found fake / bogus, their promotion shall stand cancelled.
7. The District Education Officer (Male), Nowshera will issue Clearness Certificate after the verification process.
8. **Charge Report should be submitted to all concerned.**
9. Their Inter-Se-Seniority on lower post will remain intact.
10. No TA / DA is allowed for joining their new post.
11. They will give an undertaking to be recorded in their Service Books to the effect that if any overpayment is made to them in light of this order will be recovered and if anyone is wrongly promoted he shall be reversed.
12. No. TA/DA is allowed.

(Fayaz Hussain)

District Education Office (Male)  
Nowshera

**Endst: No. 3089-3106/DEO (M) NSR/EA-S/Prom: of SSTs. Dated Nowshera the, 21/ 02 / 2019.**

Copy of the above is forwarded for information to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar w/r to Notification No. quoted above.
2. District Accounts Officer, Nowshera.
3. Deputy District Education Officer (Male), Nowshera.
4. District Monitoring Officer (IMU) Nowshera.
5. Sub Divisional Education Officer (Male), Nowshera/Pabbi.
6. Assistant District Education Officer - Establishment (Primary & Secondary), Local office.
7. Superintendent - Establishment (Primary & Secondary), Local office.
8. Dealing Assistant - Establishment (Primary & Secondary), Local office
9. Assistant Programmer D-EMIS, local office.
10. Accountant, Local office.
11. Officers concerned.
12. Master File.

District Education Officers (Male)  
Nowshera

ADPC  
Dep't  
SST (SC)



OFFICE OF THE  
DISTRICT EDUCATION OFFICER (MALE)  
NOWSHERA

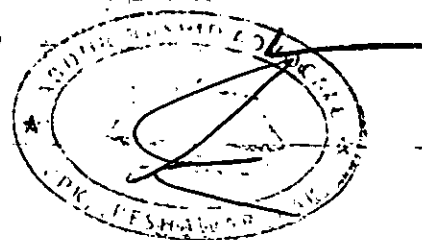
☎ 0923-9220228 ☎ 0923-9220228 ✉ emisnowshehra@panoo.com

**POSTING ORDER**

In pursuance of the revised Notification issued by the Directorate of Elementary Education, Khyber Pakhtunkhwa, Peshawar vide Endst: No. 6077-83/File No. 2 Promotion SST B-16 date Peshawar the 31/01/2017 and in supersession of the posting order and subsequent corrigendum issued by this office in this regard, the postings of the newly promoted SST (General) BPS-16 (Rs.15880-1280-54280) are hereby ordered in the schools noted against each, on the terms and conditions given below in the interest of service with immediate effect.

S#	S.L. #	Name & Designation	Present School	Place of Posting	Remarks
<b>A. SST (General)</b>					
<b>1. Promotion of Sr. CT / CT to SST (General) BPS-16</b>					
01	104	Muhammad Abid SCT	GHSS, Khair Abad	GHSS Khair Abad	AVP
02	144	Wazir Khan SCT	GHS, Mali Khel Bala	GCMHS, Akora Khattak	AVP
03	145	Shahid Hussain SCT	GHS, Banda Sheikh Ismail	GHS, Zakhi Qabristan	AVP
04	146	Hamid Gul SCT	GHS, Spin Khak	GHS, Bakhtai	AVP
05	147	Haj Wali SCT	GHS, Pahari Kati Khel	GHS, Pahari Kati Khel	AVP
06	148	Sher Khan Khattak SCT	GHS, No.1 NSR Cantt	GHS, No.1 NSR Cantt	AVP
07	150	Zulfiqar Khan SCT	GHS, Dheri Kati Khel	GHSS, NSR Kalan	AVP
08	153	Qadar Raz SCT	GHS, Jabba Khushik	GHS Palosi Payan	AVP
<b>2. Promotion of Sr. DM / DM to SST (General) BPS-16</b>					
01	22	Shah Umar SDM	GHSS, Shaidu	GHSS, Khair Abad	AVP
<b>3. Promotion of Sr. AT / AT to SST (General) BPS-16</b>					
01	21	Faqeer Shah	GHSS, Shaidu	GCMHS, Akora Khattak	AVP
<b>4. Promotion of Sr. TT / TT to SST (General) BPS-16</b>					
01	03	Subhan Ud Din STT	GHS, No.2 NSR Kalan	GHSS, NSR Kalan	AVP
<b>5. Promotion of Sr. Qari / Qari to SST (General) BPS-16</b>					
01	06	Muhammad Sanadi Sr. Qari	GHS, No.1 NSR Cantt	GHS, Zando Banda	AVP
<b>Consequent Transfer</b>					
01		Masood Khan SST (G)	GHS, Palosi Payan	GMS, Makeen Abad	AVP
02		Muhammad Tariq SST (G)	GHSS, Risalpur	GHS, Badrashi	AVP
03		Ajmal Mumtaz SST (G)	GHS, Wattar	GCMHS, Akora Khattak	Working until working post AVP
04		Muhammad Israr SST (G)	GMS, Gol Dheri	GMS, Aziz Abad	AVP
05		Shakeef Uf Rehman SST (G)	GMS, Turlandi	GMS, Guldhari	AVP

Dep't  
SST (SC)



Promotion of SC/SDM/ASAT/ST/ST to SST (BPS-16)

3	Fazali Wahab SST (G)	GHS, Marhahi Banda	GMS, Turlandi	August 2017
7	Naseem-Ullah Jan SST (G)	GHS, Amangarh	Govt. Shaheed Ali Abbas High School Darghesud	A.P.P

**Terms & Conditions:**

1. They will be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulation as may be issued from time to time by the Government.
3. Their services can be terminated at any time; in case their performance is found unsatisfactory during probation period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. The Principals / Head Master / Drawing & Disbursing Officers should checked their original documents (Academics + Professional) before handing over charge.
5. The Principals / Head Masters / Drawing & Disbursing Officers are required to submit their necessary documents for verification to District Education Officer (Male), Nowshera along with original payee receipt.
6. The Principals / Head Masters / Drawing & Disbursing Officers should not release their pay in BPS-16 until and unless their necessary documents are verified from the Universities concerned. During the verification process, if any Degree / Certificate is found fake / bogus, their promotion shall stand cancelled.
7. The District Education Officer (Male), Nowshera will issue Clearance Certificate after the verification process.
8. Charge Report should be submitted to all concerned. However, those candidates who have already submitted their charge reports as a result of the previous posting order / corrigendum, do not need fresh charge report.
9. Their Inter-Se Seniority on lower post will remain intact.
10. No TA / DA is allowed for joining their new post.
11. They will give an undertaking to be recorded in their Service Books / File to the effect that if any overpayment is made to them in light of this order will be recovered and if anyone is wrongly promoted him shall be reversed.

(Fayaz Hussain)

District Education Office (Male)  
Nowshera

Endst: No. 4951-62/DEO (M) NSR/EA-S/Prom. of SSTs. Dated Nowshera the, 08/02/2017.

Copy of the above is forwarded for information to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar w/r to Notification No. quoted above.
2. District Accounts Officer, Nowshera.
3. Deputy District Education Officer (Male), Nowshera.
4. District Monitoring Officer (IMU) Nowshera.
5. Sub Divisional Education Officer (Male), Nowshera.
6. Assistant District Education Officer - Establishment (Primary & Secondary), Local office.
7. Superintendent - Establishment (Primary & Secondary), Local office.
8. Dealing Assistant - Establishment (Primary & Secondary), Local office.
9. Assistant Programmer D-EMIS, local office.
10. Accountant, Local office.
11. Officers concerned.
12. Master File.

District Education Officers (Male)  
Nowshera

Copy of  
Science T

Anexura (C)

19

NTS 2017 25/

DISTRICT NOWSHERA (Male)

District Cadre SST Posts 2017-2018

S.N o.	District Name	School Codes	Name of School.	SST-Sc:	SST-Sc:Math/Phy: BPS-16	SST-Arts. B-16	Total.	
				Bio/Chem: BPS-16				
				M	M	M		
1	Nowshera	291601	GHS ASC Colony ✓	1	1	1	3	
2	Nowshera	291602	GHS Badrashi			1	1	
3	Nowshera	291603	GHS Bakhtai ✓	1	1		2	
4	Nowshera	291604	GHS Camp Koroona	1		1	2	
5	Nowshera	291605	GHS Dheri Kati Khel			1	1	
6	Nowshera	291606	GHS Garu			1	1	
7	Nowshera	291607	GHS Inzari			1	1	
8	Nowshera	291608	GHS Kana Khel ✓	1	1	1	3	
9	Nowshera	291609	GHS Kotar Pan			1	1	
10	Nowshera	291610	GHS Kotli Saleh Khana			2 ✓	2	
11	Nowshera	291611	GHS Marhati Banda			1	1	
12	Nowshera	291612	GHS Maroba			1	1	
13	Nowshera	291613	GHS Mian Essa ✓		1		1	
14	Nowshera	291614	GHS Mughalki	1		1	2	
15	Nowshera	291615	GHS No2 Kalan			1	1	
16	Nowshera	291616	GHS Pahari Katti Khel	1			1	
17	Nowshera	291617	GHS Palosi Payan			1	1	
18	Nowshera	291618	GHS Saadat Abad ✓	1	1	1	3	
19	Nowshera	291619	GHS Sadiq Abad ✓	1	1	1	3	
20	Nowshera	291620	GHS Samandar Garhi	1			1	
21	Nowshera	291621	GHS Spin Kani Khurd ✓	1	1	1	3	
22	Nowshera	291622	GHSS Khesghi Payan	1			1	
23	Nowshera	291623	GHSS Nizampur NSR	1		1	2	
24	Nowshera	291624	GHSS Rashakai NSR ✓	1	1		2	
25	Nowshera	291625	GMS Ali Abad			1	1	
26	Nowshera	291626	GMS Jabba Daudzai			1	1	
27	Nowshera	291627	GMS Shahab Khel Ziarat Kaka Sahib			1	1	
TOTAL				13	8	22	43	

  
**ATTESTED**

33 Post  
M.P.S. Phy

NTS cycle

Directorate of Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,  
9210437, 9210957, 9210468  
Fax 091-9210936  
E-mail rafiq\_kk851@yudhoo.com

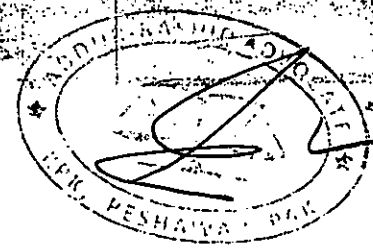


APPOINTMENT.

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Secondary School Teacher (SST Bio Chem). (SST General) School based in BPS-6 (Rs. 15880-1280-54280) @ Rs. 15880/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge:

(SST Bio Chem)

Roll No	Name	Father Name	Permanent Address	Academic Marks (out of 100)	NTS Marks (Out of 100)	Total Marks (Out of 200)	School
571030265	Zahir Ali	Amir Zaman Khan	Civil Bazar Risal Pur Cantt District And Tehsile Nowshera CNIC No.17201-5704473-3	64.44	75	139.44	GHS Zando Banda
601001003	Abdul Rahim Khan	Abdul Hasson	C/O Teriq General Store Near Bilal Masjid Street Bilal Lane Arbab Road University City Town Peshawar CNIC No.17201-1562500-1	67.03	69	136.03	GHS Dag Besud
573001557	Manzoor Hussain	Biladar Khan	Village Gulistan Korona Mohallah Mandoori Khesgi Bala Post Office Khesgi Payan, District Nowshera CNIC No.17201-3990071-1	67.08	66	133.08	GHS Kotar Pan
571030261	Noman Zeidi	Shoukat Ali	Vill Khudrizai Muhallah Samander Garhi Teh Pabbi Distt Nowshera CNIC No.17201-5575446-1	69.98	61	130.98	GHS Wazar Gham
711009747	Jehanzeb Ali Shah	Muzahid Gul	Mohallah Daulau Sharif Village And Post Office Ziala Kaka Sahib Nowshera CNIC No.17201-8115146-5	62.29	68	130.29	GHS Misti Bonara
571030311	Muhammad Ali Qureshi	Fakir Niaz	Village Post Office Pabbi Mohallah Khan Sher Garhi Near Speen Jumat Tehsil Pabbi CNIC No.17201-9507958-5	73.16	57	130.16	GHS Pabbi
601091205	Kareem Ullah	Tawab Gul	Mohallah Ahmad Khalil Village & P/O Kahi Nizampur Nowshera CNIC No.17201-7280556-9	72.77	55	129.77	GHS Dambazga
601091310	Muhammad Hussain	Muhammad Hussain	Moh Mian Bahdur Shah Village Amunkot Post Office Pabbi Tehsil Pabbi District Nowshera	60.57	69	129.57	GHS Mal Kial



Nowshera Male Appointment Order SST Adhoc

(2)

601000316	Muhamma d Ismail	Manzoor Ahmad	CNIC No.17201-6717291-1 H No 2 St Hazrat Ali Malikabad Near Wapda House Peshawar CNIC No.17201-7417518-5	60.55	67	127.55	GHS PAF Risalpur
571000288	Zer Ali Khan	Gul Hassan	Mohallah Malakam Vill And Post Office Tasujabba Tehsil Pabbi District Nowshera CNIC No.17201-7142797-5	60.48	67	127.48	GHS Kandi Taza Din
571000281	Sadiq Hussain	Samin Jan	Mondoori Zande Banda Chail Post Office Khesghi Payan Tehsil And District Nowshera CNIC No.17201-6946252-3	72.29	55	127.29	GHS Hamza Rashakai
571000309	Fazal E Rabbi	Fazal E Majeed	Mohallah New Kanday, Village Tarkha, Post Office Taru Jabba, Tehseel Pabbi District Nowshera, Khyber Pakhtoon Khwa, CNIC No.17201-8352733-5	61.35	65	126.35	GHS Mandi Banda
571000263	Rawai Shah	Rasheed Shah	Fg. Public School Number 1 Boys Nowshera Cantt District Nowshera, Kpk CNIC No.41104-0195867-3	63.99	62	125.99	GHS/S Spina Khak
571000274	Ihsan Zada	Sharif Zada	Mohalla Nasir Khel Village And Post Office Jaroba Tehsil Pabbi District Nowshera CNIC No.17201-4376655-5	61.77	63	124.77	GHS Jabbi
571000291	Mian Sylaiman	Mian Kifayat Ullah	Mohallah Mian Khel Pabbi, Village And Post Office Pabbi District Nowshera, CNIC No.17201-5033473-9	59.63	65	124.63	GHS Jhama
571000237	Muhamma d Arif	Muham mad Shafi	Village And Post Office Mohib Banda District Nowshera, Pabbi, Nowsher, CNIC No.17201-2725436-7	60.6	64	124.6	GHS Banda Nabi
571000251	Muhamma J Shouib	Suleman Gul	Mohallah Shahi Bagh Shaidu P/C 24030 District And Tehsil Noshera CNIC No.17201-2108894-9	61.29	63	124.29	GHS Jehangira Road
571000389	Abbas Ali- Shah	Javed Ali Shah	Mohallah Tor Khel Village And Post Office Ziarat Kaka Sahib CNIC No.17201-8069989-1	65.18	58	123.18	GHS Mandi Sharif
571000390	Muhamma d Kamran	Muham mad Tanveer	House Number 227/9 Ra. Bazar Nowshera CNIC No.17201-1330787-5	61.73	61	122.73	GHS Risalpur NSR
571000670	Adnan Akbar	Abdul Akbar	Muhammad Khan Colony Risalpur Saddar District Nowshera CNIC No.17201-S700682-7	61.64	61	122.64	GHS PAF Risalpur
571000670	Farhan Ali	Shoukat Ali	Mohallah Gordan Village And Post Office Box Shaidu Tehsil Jehangira Nowshera CNIC No.17201-1515910-5	64.5	58	122.5	GHS Khanra
571000670	Shahid Ahmad	Tilawat Khan	Village Watar Post Office Atara Khattak District And Tehsil Nsf	55.2	67	122.2	GHS Shaidu No 2

AIT



22

23	571000321	Idrees Anwar	Anwar Nahi	Mohalla Kakayzai Village Akora Khattak Tehsil Jehangira District Nsr CNIC No.17201-2134195-3	58.14	63	121.14	GHS Cheshmai
24	601000528	Abid Ali	Muham mad Ali	Village & P/O Taru Jabba Distt Nowshera Teh Pubbi CNIC No.17201-5874716-3	61.27	59	120.27	GHS Walai
25	571000384	Masoud Shah	Sultan Badshah	Mohallah Shahbaz Kheil Vilalge Garu Post Office Nizampur District Nowshera District Nowshera CNIC No.17201-3632980-9	59.11	61	120.11	GHS Garu
26	201000564	Abdul Bascer Badshah	Anhar Badshah	Kheshgi Bala Village Babajee Kili Mohallah Faqeer Abad Post Office Kheshgi Payan Nowshera CNIC No.17201-8915328-9	60.2	59	119.2	GHS Pirsabaq
27	571000297	Tahir	Khalil Gul	Vilage Issory Payan Post Office Akora Khattak Tehs Ljehagar District Nowshera CNIC No.17201-2479074-5	62.73	56	118.73	GHS Bagli Ban Pura
28	571000255	Aman Ullah Khan	Essa Khan	Village Balu Mohalla Shaheed Baba, Post Office Jabbra Tehsil Pabbi, District Nowshera, Kpk CNIC No.17201-9056293-9	54.6	64	118.6	GHS Banda Sheikh Ismail
29	571000299	Ibn E Ameen	Jan Muham mad	Mohallah Lali Kheil Khghgi Bala Mehra Post Office Kheghi Payan Nowshera CNIC No.17201-7566235-3	55.33	63	118.33	GHS Wattar
30	571000301	Muhamma d Khalid	Fozir Hussain	Village And Chand Bibi Post Office Pabbi District Nowshera CNIC No.17201-2241100-3	59.82	58	117.82	GHS Dagi Banda
31	571000312	Khalid Din	Noor Madin	Mohallah Khawaja Kheil Village And Po Kahi Dist Nowshera CNIC No.17201-1888635-3	52.79	65	117.79	GHS Khair Abad
32	571000308	Atallah	Rahmat Ullah	Masjid Rahim Ullah Mohallah Yado Kheil Village Dag Behsood Post Office Box Pabbi Tehsil Pabbi District Nowshera CNIC No.17201-5420182-7	59.67	56	115.67	GHS Shekhan
33	571000256	Muhamma d Kamal Khan	Muham mad Zahir	Kheshgi Bala Babajee Killi Distrtict And Tehsile Nowshera Post Office Kheshgi Payan Bala CNIC No.17201-3505225-9	62.44	53	115.44	GHS NSR Kalan

(SST Maths Phy)

Roll No	Name	Father Name	Permanent Address	Academ ic Marks (out of 100)	NTS Marks (Out of 100)	Total Marks (Out of 200)	School
571000305	Muhammad Amir Zia	Zia Ur Rahman	Mohallah Sammander Garhi Village Khudrezai Post Office Pabbi District Nowshera	70.58	59	129.58	GHS Kandi Taza Dim

ATTEST

Government Male Appointment Order SSI Adhoc (23)

57200017	Salman Khan	Dilaram Khan	CNIC No. 57201-3765186-1 Village Ismail Khel Po Akora Khattak CNIC No. 17201-5265078-3	61.95	67	128.95	GHS Zara Miata
57200020	Zahir Ullah	Sartaj Khan	Mohallah Kalinger Sohbat Kerone Post Office Risalpur District Nowshera CNIC No. 17201-0900540-3	64.64	64	128.64	GHS Bara Banda
57200016	Muhammad Ismail Khan	Fida Muhammad	Shobra Chowk Babo Mohallah House No 1080 Nowshera Cantt CNIC No. 17201-9563952-3	66.91	60	126.91	Govt. Shaheed Mujahid Hussain Shah High School Taru Jabba
57200010	Zahir Shah	Abdul Karim Khan	Dehry Kalinger Post Office Risalpur Tehsil And District Nowshera CNIC No. 17201-5146008-3	64.49	62	126.49	GHS Risalpur NSR
572000109	Muhammad Tufail	Muhammad Bashir	Mohallah Umer Farooq Village Rashakai District And Tehsil Nowshera CNIC No. 17201-5776189-9	62.97	63	125.97	GHS Misti Banda
602000619	Abdul Saboor	Abdul Rauf	Mohallah Umar Farooq Rashakai Tehsil And District Nowshera CNIC No. 17301-4750275-9	68.95	57	125.95	GHS Rashakai NSR
572000089	Atiq Ur Rehman	Shaheen Akbar	Village Dagi Jadeed Post Office Dagi Banda Pabbi District Nowshera CNIC No. 17201-3683958-5	63.92	62	125.92	GHS Shah Kot
572000201	Luqman Ud-Din Khattak	Jamal Ud Din Khattak	Mohallah Abbas Khel Village And Post Office Dak Ismail Khel Tehsil Pabbi District Nowshera, CNIC No. 17201-3779612-5	61.96	64	125.76	GHS Jaroba
572000072	Khojan Ali Shah	Sabir Ghani	District Teh Nowshera P.O. Akora Khattak Village Chashmai CNIC No. 17201-4711102-7	67.17	58	125.17	GHS Chashmai
572000119	Murad Ali	Rahmat Ullah	Village And Post Office Tarkha Tehsil Pabbi District Nowshera CNIC No. 17201-1639233-9	67.97	57	124.97	GHS Kurvi
572000201	Irfan Ullah	Sheraz Gul	Village And Post Office Nizampur District Nowshera CNIC No. 17201-6875469-3	61.74	63	124.74	GHS Garu
572000183	Bahar Ali	Liaqat Ali	Mohallah Khattak Village And Post Office Kheshti Payan District And Tehsil Nowshera CNIC No. 17201-1451920-1	58.63	65	123.63	GHS Kheshti Payan
572000193	Shah Zeb Nawaz	Sasfaraz Khan	Street Mangal Peer Baba Village Jabba Daud Zai Oo Akbar Pura Teh Pabi Nowshera CNIC No. 17201-1510040-1	67.53	56	123.53	GHS Zaki Qabristan
572000163	Muhammad Arif	Muhammad Ibrahim	Mohallah Safdar Shalli Village And Post Office Akbarpura Tehsil Pabbi Dist Nowshera CNIC No. 17201-4092934-5	60.35	63	123.35	Govt. Shaheed Waseem Iqbal High School Tarkha
602000169	Asad Muhammad	Sardar Muhammad	Village Kotli Kalan Mohallah Namawar Khel Post Office Saleh Khana Teh Sil Pabbi District Nowshera CNIC No. 17201-7666659-7	61.75	61	122.75	GHS Spun Khak

ATTESTED

(24)

572000107	Sajjad Ali	Sana Ali	Mohalla Darvesh Khel Vill Po Saida Teh Jhangoria CNIC No.17201-1771732-9	65.58	57	122.58	GHS Khawrai
572000108	Noor Ul Fhaliq	Saif Ullah	District And Teshil Nowshera Village And Post Office Kahi Mohallah Miaz Khal CNIC No.17201-5772333-5	63.27	59	122.27	GHSS Jabbi
572000109	Muhammad Fairan	Noor Habib	Village Kalingar Pso: Office Risal Pur District Nowshera CNIC No.17201-8838950-1	62.25	60	122.25	GHS Behram killi
572000110	Muhammad Waheed Ahmad	Tilawa: Khan Khattak	Mohallah Qurban Khel Village And Post Office Jallozai District Nowshera Tehsil Pabbi CNIC No.17201-3136452-7	61.23	61	122.23	GHSS Jallozai
572000111	Ajmal Khan	Safdar Khan	Village Banda Shekh Ismail Tehsil Pabbi District Nowshera CNIC No.17201-0409766-3	67.11	55	122.11	GHSS Akbar Pura
572000112	Saeed Ullah	Amin Ullah	Mohallah Mondi Khail Vill Main Essa Po Abc CNIC No.17201-2685182-3	65.88	56	121.88	GHSS Khair Abad
572000113	Farhat Ullah	Sher Moham mad	Mohallah Akhter Abad Village And Post Office Akber Pura Tehsil Pabbi District Nowshera CNIC No.17201-2091730-5	58.45	63	121.45	Gout: Shaheed Muhammad Waseem High School Pir Pai
572000114	Fida Hussain	Usman Uddin	Moh Ghareeb Abad Vill And Po Khesghi Payan CNIC No.17201-9602384-9	58.29	63	121.29	GHS Khatt Killi
572000115	Majid Shahzad	Chulam Muham mad	Mohallah New Gul Bahar Post Office Akora Khattak District Nowshera CNIC No.17201-1731548-3	57.76	63	120.76	GHS Adamzai
572000116	Imran Khan	Fazali Rabbi	Maira Khesghi Bala Mohallah Abdul Karim Baba Korona Post Office Khesghi Payan Nowshera District Nowshera CNIC No.17201-7999705-9	66.41	54	120.41	GHS Noor Cantt
572000117	Majid Khan	Kahim Khan	Mohallah Mana Khail Village Dheri Katti Kahir Tehsil And District Nowshera CNIC No.17201-3085010-3	56.22	64	120.22	GHS Walat
572000118	Muhammad Ayaz	Abdullah Jan	Village Dawa Kalay Post Office Akbar Pura District Nowshera CNIC No.17201-9749530-9	54.2	66	120.2	GHS Mohib Banda
572000119	Taimoor Farooq	Umar Farooq	Mohallah Arif Abad Village Khesghi Bala Post Office Khesghi Payan District And Tehsil Nowshera CNIC No.17201-5373650-7	58.92	61	119.92	GHSS Akbar Pura
112000294	Junaid Khan	Shewa Khan	Village Ismail Khel Post Office Akroa Khattak Dist Teh Nowshera CNIC No.17201-9699431-3	61.69	58	119.69	Gout: Shaheed Mujahid Hussain Shah High School Taru Jabba
572000215	Sabir Rehman	Shams Ur Rehman	Mohallah Rehmanabad, Village Comay, Post Office Nizampur, District Nowshera CNIC No.17201-8240415-5	57.25	60	117.25	GHS Hisar Tang

Signature  
A. I. Khan

Roll No Habib	Habib E Rehman	Mohallah Sada, Abad Village And Post Office Shaidu CNIC No.17201-1701076-3	58.21	53	111.21	GHS Manahi
Roll No Hayat	Hayat Ullah	Mohallah Mele Khel Village Kheshgi Bela Post Office Kheshgi Payan Nowshera CNIC No.17201-3419184-3	63.85	48	111.85	Services placed at the disposal of DEO(M) Nowshera

(SST General)

Roll No	Name	Father Name	Permanent Address	Academic Marks (out of 100)	NT S Marks (Out of 100)	Total Marks (Out of 200) J+H+I	School
573001307	Zakir Ud Din	Kalam Ud Din	Moh Mastana Village Nizam Pur Distt Nowshera CNIC No.17201-0768333-5	64.22	85	149.22	GHS Nizampur NSR
573001114	Sajjad Ali Khan	Tamash Khan	Mohalla Samander Garhi Nowshera Kalan Near Tangaza Cah CNIC No.17201-7955256-3	70.05	78	148.05	GHS Risalpur NSR
573000897	Afrasiab Khan Khatriak	Jamshed Khan	Mohallah Hajbad Village And Post Office Shaidu 24030 Tehsil Jehangira CNIC No.61101-7933893-5	63.02	84	147.02	GMS Shaidu
573001330	Afaq Ahmad	Muzaffar Shah	Village Dagbehsood Post Office Lr/S Pabbi Tehsil District Nowshera CNIC No.17201-1411430-3	65.72	80	145.72	GHS Jallozat
573001307	Asif Iqbal	Sareer Iqbal	Mohallah Kaji Khel Balal Village Ziarat Kaka Sahib Nowshera CNIC No.17201-0390352-3	66.54	79	145.54	GHS Pirsabaq
573000985	Muhammad Tufail	Aurang Zeb	R.A Bazar Nowshera Chatti Lal Kurti House No.116 Street Noori Masjid Dalkurti CNIC No.17201-5231402-1	65.5	80	145.5	GHS Wattar
573001167	Zufar Anwar	Syed Anwar	Mohallah Akhun Khel Village And Post Office Shaidu Tehsil And District Nowshera CNIC No.17201-1027934-1	68.42	75	143.42	GHS Kamli
573001231	Inayat Ullah	Muhamma d Said	Inayat Ullah Village Tanqeer Abad Post Office Akora Khattak Misri Banda CNIC No.15704-0554399-3	61.09	82	143.09	GHS Misri Banda
603003724	Imtiaz Alam Khan	Sameen Jan	Village Babi Jadeed Post Office Taru Jabba Tehsil Pabbi District Nowshera CNIC No.17201-2572020-7	68.9	74	142.9	GHS Rashaka NSR
573000560	Asif Nawaz	Anwar Khan	Village Nari Post Office Jehangira Tehsil Jehangira Road District Nowshera CNIC No.17201-2205558-5	64.17	78	142.17	GHS Jehangira Road
573000910	Syed Mehar Wali Shah	Syed Qabool Shah	Moh Piran Village And P/O Pirsabaq Teh And Dist: Nowshera CNIC No.17201-6620133-9	55.14	87	142.14	GHS Wala
453004230	Muhammad Waqar	Muhamma d Niser	Moh Gharib Abad Bara Banda P.O Risalpur Distt Nowshera CNIC No.17201-9417205-7	66.62	75	141.62	GHS Pirsabaq

Handwritten signature and stamp on the right side of the page.

14	053002275	Muhammad Shafiq	Muhammad Hanif	Mohallah Nawababad Khesghi Bala P.O Khesghi Pagan CNIC No. 17201-2163659-5	66.14	75	141.14	GHSAC Centre
15	053002275	Shakoor Ahmed	Niaz Gull	Village And Post Office Kahi Teh And Dist Mowshera CNIC No. 17201-0573284-3	63.67	77	140.67	GHSAC Centre
15	053002275	Shahid Khan	Hameed Khan	Village Shpano Kally Po Risalpur Teh And Dist Mowshera CNIC No. 17201-5207248-7	62.65	78	140.65	GHSAC Centre

**TERMS & CONDITIONS**

1. NO TA/DA etc is allowed
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year wef 1st May, 2017 to 30th April, 2018.
4. She should not be handed over charge if she exceeds 35 years or below 18 years of age. Age relaxation case may be submitted to competent authority.
5. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO (concerned), any one found producing bogus Certificate will be reported to the law enforcing agencies for further action.
6. His/her services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
7. Pay will not be drawn until and unless a certificate to the effect by DEO (concerned) is issued that his/her certificates are verified.
8. He/She should join his post within 10 days of the issuance of this notification. In case of failure to join the post within 10 days of the issuance of this notification, his/her appointment will expire automatically and no subsequent appeal etc shall be entertained.
9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. He/she will be governed by such rules and regulations as may be issued from time to time by the Govt.
11. His/her services shall be terminated at any time, in case his performance is found unsatisfactory during his/her contract period. In case of misconduct, he/she shall be proceeded under the rules framed from time to time.
12. His/her appointment is made on School based, He/she will have to serve at the place of posting and His/her service is not transferable to any other station.
13. Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(Muhammad Rafiq Khattak)

Director  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar.

4879-4905  
Endst: No. / File No. 2/A-14/SST/Adhoc/Apptt: Dated Peshawar the 28/04/2017.

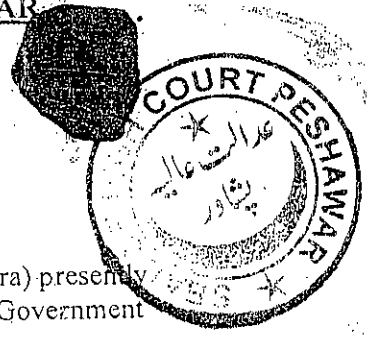
- Copy forwarded for information and necessary action to the:-
1. Accountant General Khyber Pakhtunkhwa Peshawar.
  2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
  3. District Education Officers Concerned
  4. District Accounts Officer Concerned
  5. Official Concerned.
  6. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
  7. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
  8. M/File

Dy. Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar.



**IN THE PESHAWAR HIGH COURT PESHAWAR**

In Ref: to WP No. 1495 P/2017.



- 1) Naveed Khan S/O Pervaiz khan R/O Dagbesood (Nowshera) presently working and posted as Senior Certified Teacher (SCT) at Government Shaeed Ali Abbas High School Dagbasood (Nowshera).
- 2) Dalil Khaul S/O Mutawal Khan R/O Akora Khattak (Nowshera) presently working and posted as Senior Certified Teacher (SCT) at Government Centennial Model High School Akora Khattak (Nowshera).
- 3) Rayaz Muhammad S/O Faqir Muhammad R/O Akbar Pura (Nowshera) working and posted as Senior primary School Teacher (SPST) Ali Shah (Pabbi/Nowshera).
- 4) Zain Ullah S/O Zardullah Khan R/O Dagbasood (Nowshera) working and posted as Senior primary School Teacher (SPST) at Government No. 5 Dagbasood (Pabbi/Nowshera).
- X 5) Naseer Muhammad S/O Faqir Muhammad R/O working and posted as Senior primary School Teacher (SPST) at Government Primary School No. 1 Pabbi (Nowshera).
- 6) Asif Khan S/O Rahmani Gul R/O Aman Kot (Pabbi) presently working and posted as Senior primary School Teacher (SPST) at Government Primary School Amankot (Nowshera).
- X 7) Amin-ur-Rehman S/O Khan Zada R/O Resalpur (Nowshera) presently working and posted as Senior primary School Teacher (SPST) at Government Primary School Barakabad (Nowshera).
- 8) Amir Muhammad S/O Adil Muhammad R/O Azakhel Payan, Nowshera, presently working and posted as Senior primary School Teacher (SPST) at Government Primary School No. 1 Azakhel Payan (Nowshera).

PETITIONERS.

VERSUS

1. Secretary to the government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Civil Secretariat Peshawar.
2. Director, Elementary & Secondary Education Department, Province of Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Male) Nowshera.....

RESPONDENTS.

FILED TODAY

Deputy Registrar

08 APR 2017

ATTESTED

EXAMINER

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF PAKISTAN 1973 AS AMENDED UP-TO DATE 13 JAN 2018

WP 1495 P 2017

ATTESTED

Ameri (D)

(D)

28

Judgment Sheet

IN THE PESHAWAR HIGH COURT, PESHAWAR.  
JUDICIAL DEPARTMENT.



Writ Petition No. 1495-P/2017

Naveed Khan etc..vs...Secretary to Govt of  
Khyber Pakhtunkhwa Elementary & Secondary  
Education etc.

JUDGMENT

Date of hearing.....09.01.2018.....

Petitioner(s) by Mr. Muhammad Usman Khan Turlandi,  
Advocate.

Respondent (s) by Mr. Muhammad Riaz Khan, AAG.

\*\*\*\*\*

ROOH-UL-AMIN KHAN, J:- By invoking the constitutional jurisdiction of this Court under Article-199 of the Constitution of Islamic Republic of Pakistan, 1973, petitioner seek their promotion to the post of SST (BPS-16) on the basis of seniority cum fitness against 75% quota reserved for promotion.

2. According to the contents of the writ petition, the petitioners joined the services in the respondents department and were lastly promoted to the posts of Senior Certified Teacher (SCT) and Senior Primary School Teacher (SPST) respectively and are performing their duties as such. The respondents in utter violation of Notification No. SO (PE)4-5/SSRC/Meeting/2013/Teaching

looked in

ATTESTED  
EXAMINER  
Peshawar High Court  
13 JAN 2018

Cadre, dated 24.7.2014, whereby 75% quota for the posts of SST ( BPS-16) has been served /sanctioned for promotion on the basis of seniority cum fitness and 25% for initial recruitment, advertised 62 vacant posts of Senior Science Teacher ( BPS-16) to be filled up through fresh / initial recruitment, without reserving a single vacancy for promotion amongst the Senior Certified Teachers or Senior Primary School Teachers.

3. Learned AAG contended that the respondents-department has already considered the case of petitioners for promotion under their specified 75% quota, however they were lacking the requisite qualification, therefore, could not be considered. He pointed out that the petitioner No. 1 and 2 have qualified BSc examination in Math-A, Maths-B and Statistics and do not fulfill the criteria. Similarly petitioner No.7 has passed the BA/BSc in third division which is also does not come under the criteria of 75% quota. He stated that candidate who improved his qualification and got eligibility and fitness in accordance with the criteria shall be considered for promotion to the post of SST in the next meeting of Department Promotion

1. Se Committee:

4. It is manifest from the comments that the respondents have not denied the quota of promotion @ 75% however the petitioners were considered and denied to be

ATTESTED  
EXAMINER  
Peshawar High Court  
13 JAN 2018



considered for promotion on the ground of lacking the requisite qualification and not fulfilling the criteria, hence the department has not committed any illegality or irregularity.

5. The contention of learned counsel for petitioners that the petitioners have improved their qualification, therefore, they be considered for promotion w.e.f the date wherefrom their other colleagues have been considered, is unpersuasive for the reasons that such a writ cannot be issued under Article-199 of the Constitution of Islamic Republic of Pakistan, 1973, as Article 212 of the Constitution of 1973 debar this Court to interfere in the matter pertaining to terms and conditions of a civil servant.

6. For the reasons given hereinabove, the instant petition is disposed of accordingly. However, the petitioners would be at liberty to approach the proper forum, if so advised at the relevant time.

Announced on;  
09<sup>th</sup> of January, 2018  
"Zarshad"

*Sd/- R. U. Amin Khan*

*Sd/- Qalandar Ali Khan*  
JUDGE  
JUDGE



- 1. Secret *284*
- 2. Second of Application *10/1/18*
- 3. District Ed. *13/1/18*
- 4. Pakistun *13/1/18*
- 5. District Ed. *13/1/18*
- 6. Total *13/1/18*
- 7. Date of Preparation of Copy *13/1/18*
- 8. Date of Delivery of Copy *13/1/18*
- 9. Received By *Dr. Usman*

(DB) Mr. Justice Rooh Ul Amin Khan & Mr. Justice Qalandar Ali Khan.

CERTIFIED TO BE TRUE COPY

Examiner  
Peshawar High Court, Peshawar  
Authorized Under Article 8.7 of  
The Qanun-e-Shahadat Order 1984

13 JAN 2018

(Signature) 31

# Allama Iqbal Open University Islamabad



Serial No. 64704

Certified that Mr. / Ms. ASIF KHAN

Son / Daughter of RAHMANI GUL

Registration No. 98-NNA-0181 Roll No. K-6119580

having completed the prescribed requirements in semester  
AUTUMN 2001 is awarded the degree of:

## Bachelor of Education (B.Ed)

He / She has secured 66 % marks and has been placed in B grade.

*(Signature)*  
CONTROLLER OF EXAMINATIONS

Result declared on: August 12, 2002

ISLAMABAD. DATED: August 30, 2004



*(Signature)*  
S.S.I. (SC) (16)  
G.S.S.C.H.S.S. Daktari

*(Signature)*  
VICE-CHANCELLOR

THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT, ISSUED SEPARATELY.



# University of Peshawar

(Pakistan)

Session ANNUAL 1995

ASIF KHAN

Son of

RAHMANI GUL

and a student

of GOVERNMENT COLLEGE PABBI having passed the prescribed examination held in AUGUST, 1995, is this day admitted by the University of Peshawar to the Degree of

## Bachelor of Science

in the SECOND division.

The Examination was taken as a whole / in parts.

*Zain Ullah*  
ZAIN ULLAH  
S.S.T.(SC),(1)  
G.S.S.H.S.S. Dar

Serial No. 013635

Registered No. 92-PB-350

Roll No. 6355

Result declared on FEBRUARY 09, 1996



*Registrar*  
Registrar

Countersigned

*M O I*  
Vice-Chancellor

32

10

Serial No. 0083560

# ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

Roll No.  
15119580

## DETAILED MARKS SHEET

Registration No.  
98-NNA-0181

It is to certify that Mr./Ms. ASIF KHAN  
son/daughter of RAHMANI GUL has completed  
all the requirements for **BACHELOR OF EDUCATION** degree  
Programme with the following courses in AUTUMN, 2001 Semester :-

### Compulsory Courses

### Marks obtained

512	Perspectives of Education	58/100
513	School Organization & Management	63/100
514	Evaluation, Guidance & Research	66/100
518	Educational Psychology & Curriculum	63/100
651	English	55/100
652	Islam, Pakistan & Modern World	67/100
655	Practical Component	83/100

### Elective Courses

0656	TEACHING OF PHYSICS	67/100
0661	TEACHING OF MATHEMATICS	73/100
	<b>Total</b>	<b>595/900</b>

*Attested*  
*G.T.C.*  
**ZAIN ULLAH KHAN**  
S.S.T.(SC) (16)  
G.S.S.H.S.S. Daki.khel

He/She has obtained 66 % marks and has been placed in grade B.

Result Declared On

Date: 12-08-2002

*Fajrol*  
**Controller of Examinations**

Note: The Detailed Marks Sheet is issued, errors and omissions excepted, as a notice only. An entry appearing in it does not in itself confer any right or privilege independently to the grant of a proper certificate which will be issued under the Regulations, in due course.

Date of Issue: OCT 15 2003

صاحب ڈائری (E & Sec) سیر 2016

درخواست ہمارا سندھ بینک

صاحب کا

(3)

سندھ کے گورنر آئی سی (تصانیف 08-08-28) کو عرضی

تفصیلی بیمہ پلٹ پینسٹری اور بیمار اہل حق ہمارا جناب 2016ء میں  
نوٹس میں S.S.I کے 62 لوٹس شمالی طرف لیکن پڑھتی ہے D.C.5

تو پھر تمام کے تمام لوٹس کے انداز کو دیکھ کر اور 75% بیمار

کوٹہ کو کٹر تقر انداز کر دیا گیا۔ اس کے خلاف ہم ہائیلو رٹ تھے  
اور ہائیلو رٹ کے فیصلہ دیا گیا آگے سے لے کر D.P.C میں آپ

تصانیف میں آگے ہم نے پینسٹری بھی Claim کیا تھا۔ لیکن کورٹ کے  
فیصلے میں بتایا کہ آپ کا کام ہو جائیں تو آپ طرہ Suitable

صورت میں اسحاق کا مطالعہ کریں۔ اس کے بیمہ آپ کو شہری

کوٹہ میں گھڑا کرتے ہیں کہ ہمیں پینسٹری + بینک پینسٹری دے کر شہری

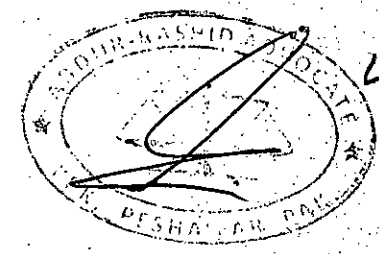
آگے صارتا داد سے نہ کسی کو پھر ہم قانوناً جاری ہوئی کا حق

مختل کرتے ہیں

الغرض

235  
31-12-2016

(1) (A) (B) (C) (D) (E) (F) (G) (H) (I) (J) (K) (L) (M) (N) (O) (P) (Q) (R) (S) (T) (U) (V) (W) (X) (Y) (Z) (AA) (AB) (AC) (AD) (AE) (AF) (AG) (AH) (AI) (AJ) (AK) (AL) (AM) (AN) (AO) (AP) (AQ) (AR) (AS) (AT) (AU) (AV) (AW) (AX) (AY) (AZ) (BA) (BB) (BC) (BD) (BE) (BF) (BG) (BH) (BI) (BJ) (BK) (BL) (BM) (BN) (BO) (BP) (BQ) (BR) (BS) (BT) (BU) (BV) (BW) (BX) (BY) (BZ) (CA) (CB) (CC) (CD) (CE) (CF) (CG) (CH) (CI) (CJ) (CK) (CL) (CM) (CN) (CO) (CP) (CQ) (CR) (CS) (CT) (CU) (CV) (CW) (CX) (CY) (CZ) (DA) (DB) (DC) (DD) (DE) (DF) (DG) (DH) (DI) (DJ) (DK) (DL) (DM) (DN) (DO) (DP) (DQ) (DR) (DS) (DT) (DU) (DV) (DW) (DX) (DY) (DZ) (EA) (EB) (EC) (ED) (EE) (EF) (EG) (EH) (EI) (EJ) (EK) (EL) (EM) (EN) (EO) (EP) (EQ) (ER) (ES) (ET) (EU) (EV) (EW) (EX) (EY) (EZ) (FA) (FB) (FC) (FD) (FE) (FF) (FG) (FH) (FI) (FJ) (FK) (FL) (FM) (FN) (FO) (FP) (FQ) (FR) (FS) (FT) (FU) (FV) (FW) (FX) (FY) (FZ) (GA) (GB) (GC) (GD) (GE) (GF) (GG) (GH) (GI) (GJ) (GK) (GL) (GM) (GN) (GO) (GP) (GQ) (GR) (GS) (GT) (GU) (GV) (GW) (GX) (GY) (GZ) (HA) (HB) (HC) (HD) (HE) (HF) (HG) (HH) (HI) (HJ) (HK) (HL) (HM) (HN) (HO) (HP) (HQ) (HR) (HS) (HT) (HU) (HV) (HW) (HX) (HY) (HZ) (IA) (IB) (IC) (ID) (IE) (IF) (IG) (IH) (II) (IJ) (IK) (IL) (IM) (IN) (IO) (IP) (IQ) (IR) (IS) (IT) (IU) (IV) (IW) (IX) (IY) (IZ) (JA) (JB) (JC) (JD) (JE) (JF) (JG) (JH) (JI) (JJ) (JK) (JL) (JM) (JN) (JO) (JP) (JQ) (JR) (JS) (JT) (JU) (JV) (JW) (JX) (JY) (JZ) (KA) (KB) (KC) (KD) (KE) (KF) (KG) (KH) (KI) (KJ) (KK) (KL) (KM) (KN) (KO) (KP) (KQ) (KR) (KS) (KT) (KU) (KV) (KW) (KX) (KY) (KZ) (LA) (LB) (LC) (LD) (LE) (LF) (LG) (LH) (LI) (LJ) (LK) (LL) (LM) (LN) (LO) (LP) (LQ) (LR) (LS) (LT) (LU) (LV) (LW) (LX) (LY) (LZ) (MA) (MB) (MC) (MD) (ME) (MF) (MG) (MH) (MI) (MJ) (MK) (ML) (MN) (MO) (MP) (MQ) (MR) (MS) (MT) (MU) (MV) (MW) (MX) (MY) (MZ) (NA) (NB) (NC) (ND) (NE) (NF) (NG) (NH) (NI) (NJ) (NK) (NL) (NM) (NO) (NP) (NQ) (NR) (NS) (NT) (NU) (NV) (NW) (NX) (NY) (NZ) (OA) (OB) (OC) (OD) (OE) (OF) (OG) (OH) (OI) (OJ) (OK) (OL) (OM) (ON) (OO) (OP) (OQ) (OR) (OS) (OT) (OU) (OV) (OW) (OX) (OY) (OZ) (PA) (PB) (PC) (PD) (PE) (PF) (PG) (PH) (PI) (PJ) (PK) (PL) (PM) (PN) (PO) (PP) (PQ) (PR) (PS) (PT) (PU) (PV) (PW) (PX) (PY) (PZ) (QA) (QB) (QC) (QD) (QE) (QF) (QG) (QH) (QI) (QJ) (QK) (QL) (QM) (QN) (QO) (QP) (QQ) (QR) (QS) (QT) (QU) (QV) (QW) (QX) (QY) (QZ) (RA) (RB) (RC) (RD) (RE) (RF) (RG) (RH) (RI) (RJ) (RK) (RL) (RM) (RN) (RO) (RP) (RQ) (RR) (RS) (RT) (RU) (RV) (RW) (RX) (RY) (RZ) (SA) (SB) (SC) (SD) (SE) (SF) (SG) (SH) (SI) (SJ) (SK) (SL) (SM) (SN) (SO) (SP) (SQ) (SR) (SS) (ST) (SU) (SV) (SW) (SX) (SY) (SZ) (TA) (TB) (TC) (TD) (TE) (TF) (TG) (TH) (TI) (TJ) (TK) (TL) (TM) (TN) (TO) (TP) (TQ) (TR) (TS) (TT) (TU) (TV) (TW) (TX) (TY) (TZ) (UA) (UB) (UC) (UD) (UE) (UF) (UG) (UH) (UI) (UJ) (UK) (UL) (UM) (UN) (UO) (UP) (UQ) (UR) (US) (UT) (UU) (UV) (UW) (UX) (UY) (UZ) (VA) (VB) (VC) (VD) (VE) (VF) (VG) (VH) (VI) (VJ) (VK) (VL) (VM) (VN) (VO) (VP) (VQ) (VR) (VS) (VT) (VU) (VV) (VW) (VX) (VY) (VZ) (WA) (WB) (WC) (WD) (WE) (WF) (WG) (WH) (WI) (WJ) (WK) (WL) (WM) (WN) (WO) (WP) (WQ) (WR) (WS) (WT) (WU) (WV) (WW) (WX) (WY) (WZ) (XA) (XB) (XC) (XD) (XE) (XF) (XG) (XH) (XI) (XJ) (XK) (XL) (XM) (XN) (XO) (XP) (XQ) (XR) (XS) (XT) (XU) (XV) (XW) (XX) (XY) (XZ) (YA) (YB) (YC) (YD) (YE) (YF) (YG) (YH) (YI) (YJ) (YK) (YL) (YM) (YN) (YO) (YP) (YQ) (YR) (YS) (YT) (YU) (YV) (YW) (YX) (YZ) (ZA) (ZB) (ZC) (ZD) (ZE) (ZF) (ZG) (ZH) (ZI) (ZJ) (ZK) (ZL) (ZM) (ZN) (ZO) (ZP) (ZQ) (ZR) (ZS) (ZT) (ZU) (ZV) (ZW) (ZX) (ZY) (ZZ)





680

ایڈوکیٹ/دستخط: \_\_\_\_\_  
بارکونسل/بار ایسوسی ایشن نمبر: Bc 11-1652  
رابطہ نمبر: 5967895

# ڈسٹرکٹ بار ایسوسی ایشن نوشہرہ

بعد االت جناب: \_\_\_\_\_ صاحب سہیل بیٹونل شہار

دعویٰ: _____	منجانب: _____
علت نمبر: _____	رسالت نمبر: _____
موردہ: _____	بنام: _____
جرم: _____	اصف خان بنام دلیر بیگم گورنر
تھانہ: _____	

**باعث تحریر آنکہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ  
 آن مقام کیلئے **محمد عارف** کیلئے  
 اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کن کاروائی کا کالم اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقسیر  
 ثالث و فیصلہ برطین دینے جو اہل دعویٰ اقبال دعویٰ اور درخواست آہر قسم کی تصدیق اور ترمیم پر دستخط کرنے کا اختیار  
 ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور مفوضی، نیز دیگر کرنے اپیل نگرانی و نظر ثانی و پیروی  
 کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے  
 ہمراہ یا اپنے بچائے تقرر کا اختیار ہوگا، اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا  
 ساختہ پر داختم منظور و قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا وہ وکیل موصوف وصول  
 کرنے کا حقدار ہوگا کوئی تیار بخ پیشی مقام دور یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا  
 وکالت نامہ لکھ دیا تاکہ مندر ہے۔

المرقوم: 30-6-2020

العبد گواہ شد العبد

مقام: \_\_\_\_\_ مورثہ: \_\_\_\_\_ کیلئے منظور ہے

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

AHAF

\_\_\_\_\_

**VAKALAT NAMA**

NO. \_\_\_\_\_/2021

IN THE COURT OF KP Sessue Tribunal, Peshawar

Asif Khan (Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

Education's Department (Respondent)  
(Defendant)

I/We, Asif Khan

Do hereby appoint and constitute **Taimur Ali Khan, Advocate High Court Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated \_\_\_\_\_/2021

Asif Khan Asif  
(CLIENT)

ACCEPTED

Taimur Ali Khan  
**TAIMUR ALI KHAN**  
Advocate High Court  
BC-10-4240  
CNIC: 17101-7395544-5  
Cell No. 0333-9390916

**OFFICE:**

Room # FR-8, 4<sup>th</sup> Floor,  
Bilour Plaza, Peshawar,  
Cantt: Peshawar