

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
CAMP COURT ABBOTTABAD

Service Appeal No. 684/2015

Date of Institution... 21.05.2015

Date of decision... 19.02.2018

Fazal Hadi, PSHT, GPS Thakot, District Batagram. ... (Appellant)

Versus

1. The Government of Khyber Pakhtunkhwa through Secretary, Elementary and Secondary Education, Peshawar and others. ... (Respondents)

----

Mr. Muhammad Amin Ayub,  
Advocate

... For appellant.

Mr. Kabeerullah Khattak,  
Addl. Advocate General

... For respondents.

Mr. Hamayun Khan,  
Advocate

.. For private respondents

MR. NIAZ MUHAMMAD KHAN,  
MR. MUHAMMAD HAMID MUGHAL,

... CHAIRMAN  
... MEMBER

JUDGMENT

NIAZ MUHAMMAD KHAN, CHAIRMAN: This judgment shall also dispose of connected service appeals No. 682/2015 Muhammad Razaq Shah, No. 683/2015 Kifayatullah and No. 698/2015 Muhammad Yousaf as in all the four appeals common questions of law and facts are involved.

2. Arguments of the learned counsel for the parties heard and record perused.

FACTS

3. The appellants are aggrieved from the promotion order dated 28.10.2014 against which they filed departmental appeals on 22.2.2015 which was not responded to and thereafter they filed the present service appeals within time.

### ARGUMENTS

4. The learned counsel for the appellants argued that the appellants were recommended for promotion by the Principal and also by the Headmaster vide list prepared on 04.01.2014. That the names of respondents No. 5 to 9 did not figure in the said list, but in the promotion order names of the appellants were omitted and the names of private respondents were added. The learned counsel for the appellants further argued that the basic qualification for the promotion was BA plus B.Ed and the private respondents were not holding the basic qualification. That is why their names were not included in the said list. That valuable rights have been accrued to the appellants. That in the minutes of DPC the names of private respondents were incorrectly included.

5. On the other hand the learned counsel for private respondents argued that the private respondents were duly qualified and that in the list mentioned above, the names of the private respondents were wrongly omitted. That the reason for this mistake was that in the service book, the entries of qualification were not correctly made. That the decision of the D.P.C was in detail which contained the names of private respondents alongwith their qualifications.

6. The learned Addl. Advocate General also adopted the arguments advanced by the learned counsel for private respondents.


### CONCLUSION.

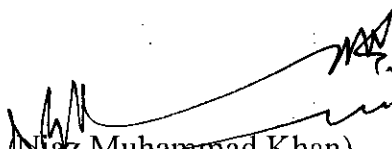
7. This Tribunal on enquiry from the private respondents came to the conclusion that the date as alleged by private respondents of passing of B.Ed examination were prior

to the holding of meeting of the D.P.C. However, the dates of acquiring of B.Ed examination of all the private respondents except private respondent No. 5 are after the date of preparation of the aforementioned list. In this regard, the private respondents on the direction of the Tribunal submitted an affidavit which is placed on file.

8. The learned counsel for the appellants has not been able to show that how names of private respondents could not be included by the DPC after 04.01.2014. The list of 04.01.2014 was prepared much before the meeting of DPC. At that time, the private respondents except the private respondent No. 5 have not passed B.Ed examination. There is no law or rules which could deprive the DPC of the powers to include the names of those who had acquired the qualification before holding of DPC. Otherwise too, the list mentioned above has no legal basis. It appears that the list is of the nature of working papers/scrutiny prepared much before holding of meeting of DPC, which did not create any vested right in favour of the appellants.

8. Consequently, the present appeals are dismissed. Parties are left to bear their own costs. File be consigned to the record room.

  
(Muhammad Hamid Mughal)  
Member

  
(Naz Muhammad Khan)  
Chairman  
Camp Court, A/Abad

ANNOUNCED

19.02.2018

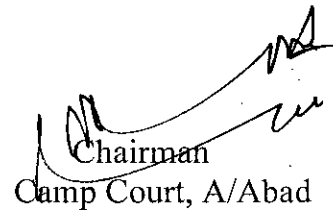
684/15

19.02.2018

Appellant alongwith counsel and Addl. AG alongwith Haq Nawaz, ADO for the official respondents and counsel for private respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, this appeal is dismissed. Parties are left to bear their own costs. File be consigned to the record room.

  
Member

  
Chairman  
Camp Court, A/Abad

ANNOUNCED  
19.02.2018

19.02.2018

Appellant alongwith counsel and Addl. AG  
alongwith Haq Nawaz, ADO for the respondents present.  
Arguments heard and record perused.

Vide our detailed judgment of today, this appeal is  
dismissed. Parties are left to bear their own costs. File be  
consigned to the record room.

Member

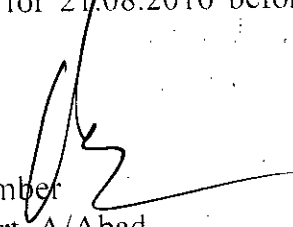
Chairman  
Camp Court, A/Abad

ANNOUNCED

19.02.2018

15.02.2017


Appellant in person, Mr. Haq Nawaz, ADEO alongwith Mr. Muhammad Siddique, Sr.GP for the official respondents and clerk of counsel for private respondents No. 4 to 9 present. Rejoinder not submitted. Appellant requested for adjournment. Adjourned for rejoinder and final hearing for 21.08.2016 before the D.B at camp court, Abbottabad.

  
Member  
Camp court, A/Abad

21.08.2017

Counsel for the appellant and Mr. Muhammad Bilal, Deputy District Attorney alongwith Mr. Haq Nawaz, ADO for the respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for final hearing on 19.10.2017 before the D.B at camp court, Abbottabad.


  
Member

  
Chairman  
Camp court, A/Abad

19.10.2017


Appellant in person and Mr. Muhammad Bilal, Deputy District Attorney for the respondents present. Rejoinder submitted. Appellant seeks adjournment. To come up for arguments on 19.02.2018 before the D.B at camp court, Abbottabad.

  
Member

  
Chairman  
Camp court, A/Abad.

17.11.2015

None present for appellant. Mr. Masoom Khan, ADO for official respondents No.1 to 3 alongwith Mr. Muhammad Siddique, Sr.G.P and agent of counsel for private respondents No.4, 5, 7, 8 & 9 present. Written reply not submitted by the afore-sated private respondents. Requested for further adjournment. Last opportunity granted. To come up for written reply/comments on behalf of private respondents No.4, 5, 7, 8 & 9 on 18.2.2016 before S.B at Camp Court A/Abad.

  
Chairman  
Camp Court A/Abad.

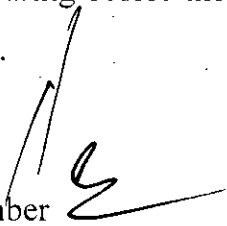
18.02.2016


Appellant in person, Mr. Muhammad Khalid, Assistant alongwith Mr. Muhammad Saddique, Sr. GP for official respondents No. 1 to 3 and counsel for private respondents No. 4, 5, 7, 8 and 9 present. Written reply by the said private respondents also submitted. The appeal is assigned to D.B for rejoinder and final hearing for 20.9.2016 at Camp Court A/Abad.

  
Chairman  
Camp Court A/Abad

20.09.2016

Appellant in person, Mr. Haq Nawaz, ADO alongwith Mr. Muhaminad Siddique Sr.GP for the official respondents and private respondents No. 4, 5, 7, 8 & 9 in person present. Counsel for the appellant has not turned up from Peshawar. Seeks adjournment. To come up for rejoinder and final hearing before the D.B on 15.2.2017 at camp court, Abbottabad.

Member 

  
Chairman  
Camp court, A/Abad

3

25.06.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as PSHT (BPS-14) when 11 vacancies accrued for promotion from amongst PSHTs to SST (BPS-16) and where against the appellant recommended on 4.1.2014 but later on another unsigned list was submitted which was objected to regarding which comments were called but vide order dated 28.10.2014 the said unsigned and unverified list was approved and appellant ignored regarding which he preferred departmental appeal on 22.2.2015 which was not responded and hence the instant service appeal on 17.6.2015.

That the appellant was entitled to promotion to BPS-16 but was maliciously ignored and private respondents NO. 4 to 9 illegally promoted.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply for 14.9.2015 before S.B at camp court A/Abad as the matter pertains to the territorial limits of Hazara Division.

Appellant Deposited  
Security & Process Fee



  
Chairman

4-

14.9.2015

Appellant in person, Mr.Masoom Khan, ADO alongwith Mr.Muhammad Tahir Aurangzeb, G.P for official respondents No.1 to 3 and private respondents No.4,5,7,8 & 9 with counsel present. None present for private respondent No.6. Proceeded ex-parte. Written reply by official respondents No.1 to 3 submitted while private respondents No. 4,5,7,8 & 9 requested for adjournment. To come up for written reply on behalf of private respondents No.4,5,7, 8 & 9 on 17.11.2015 before S.B at Camp Court A/Abad.



  
Chairman  
Camp Court A/Abad



Form- A  
FORM OF ORDER SHEET

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

Case No. 684/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	17.06.2015	<p>The appeal of Mr. Fazal Hadi resubmitted today by Mr. Khaled Rehman Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	22-6-15	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>25-6-15</u></p> <p style="text-align: right;"> CHAIRMAN</p>

This is an appeal filed by Mr. Fazal Hadi today on 21/05/2015 against the order dated 28.10.2014 against which he preferred/made a departmental appeal on 22.02.2015 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies.

1. Annexures of the appeal may be attested.
2. Appeal may be page marked according to the Index.
3. Wakalat Nama in favour of appellant be placed on file.
4. Eleven more copies/sets of the appeal along with annexures i.e. complete in all respect may be also be submitted with the appeal.

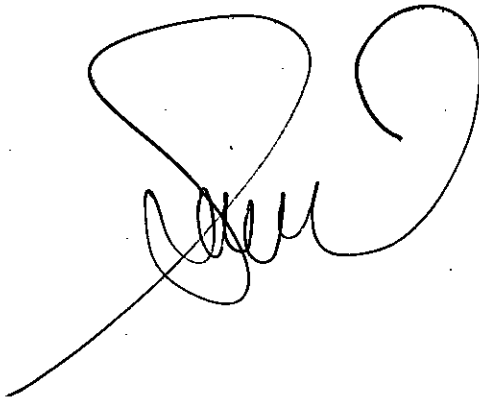
No. 783 /ST,

Dt. 22/5 /2015

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Khaled Rehman Adv. Pesh.

- ① Appeal has been attested
- ② Appeal has been Page marked
- ③ Attested
- ④ Copies have been filed



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 684 /2015

Fazal Hadi  
  
.....Appellant

Versus

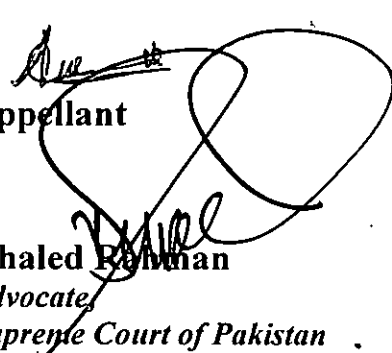
The Govt. of KPK and  
others  
  
.....Respondents

INDEX

S.No.	Description of Documents	Date	Annexure	Pages
1.	Memo of Service Appeal			1-4
2.	Promotion List	04.01.2014	A	5-6
3.	Application		B	0-7
4.	Letter	22.10.2014	C	0-8
5.	Impugned Notification	28.10.2014	D	9-12
6.	Comments	31.10.2014	E	13
7.	Adjustment Notification	29.10.2014	F	14-16
8.	Letter	11.11.2014	G	17
9.	Departmental appeal	22.02.2015	H	18
10.	Wakalat Nama			

Through

Appellant

  
Khaled Rehman  
Advocate,  
Supreme Court of Pakistan  
3-D, Haroon Mansion  
Khyber Bazar, Peshawar  
Off: Tel: 091-2592458  
Cell # 0345-9337312

Dated: 21 /05/2015

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 684 /2015A.W.F. Province  
Service TribunalDiary No. 526Dated 21-5-2015Fazal Hadi  
PSHT, GPS Thakot, District Batagram.....Appellant

Versus

1. The Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar
2. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Dabgari Garden, Peshawar.
3. The District Education Officer (Male), District Batagram.
4. Nazir Muhammad  
SST (G), GHS Hill, District Batagram.
5. Tawab Said  
SST (G), GMS Dirkadh, District Batagram
6. Shad Muhammad Khan,  
SST (G) GHS Biyari, District Batagram
7. Muhammad Khurshid,  
SST (G) GMS Jesol, District Batagram
8. Bahadar Sher,  
SST (G) GMS Jambra, District Batagram.
9. Ghulam Akbar,  
SST (G) GMS, Mirza Banda, District Batagram.....Respondents

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 28.10.2014 ISSUED BY RESPONDENT NO.2 WHEREBY RESPONDENTS NO.4-9 WERE UNLAWFULLY PROMOTED TO THE POST OF SST (G) (BPS-16) BY IGNORING THE APPELLANT AGAINST WHICH HE PREFERRED DEPARTMENTAL REPRESENTATION TO THE APPELLATE

Re-submitted to Registrar and filed.

Registrar

17/6/15

Exc - point (6)  
Mohd Anwar Khan  
No - 4 off: 14/9/15

Filed to Registrar  
21/5/15

**AUTHORITY ON 22.02.2015 BUT THE SAME WAS NOT DISPOSED OF WITHIN THE STATUTORY PERIOD OF 90 DAYS.**

---

**PRAYER:**

On acceptance of the instant appeal, the impugned Notification dated 28.10.2014 may graciously be set aside to the extent of Respondents No.4-9 and Respondents No.2&3 be directed to promote the appellant to the post of SST (G) BPS-16 w.e.f. 28.10.2014 with all consequential back benefits.

---

Respectfully Sheweth,

Facts giving rise to the present appeal are as under:-

1. That the appellant is serving as Primary School Head Teacher at District Batagram. He was appointed as Primary School Teacher on 26.12.1990 and was then promoted to the present position on 01.03.2013. He has rendered 25 year service.
2. That numerous vacancies of Secondary School Teachers (BPS-16) in the promotion quota were available in the District Batagram out of which the quota for promotion of PSHTs/SPSTs as per the rules of 20% were 11 vacancies. Accordingly a Committee for recommending the names of eligible and qualified PSHTs/SPSTs was constituted comprising of Muhammad Shuaib Khan, Principal GHSS Kuza Banda and Muhammad Tayyab, Headmaster GHS No.2 Batagram, who after thorough search and scrutiny of the entire record, prepared and submitted a List on 04.01.2014 (*Annex:-A*) for promotion to the post of SST (BPS-16) wherein the name of the appellant is at Serial No.9.
3. That the list ibid was forwarded to the competent authority for the issuance of Notification and appellant being hopeful was waiting for his promotion but the promotion was delayed. Subsequently appellant came to know that another list was clandestinely prepared by some unknown hands wherein the names of the appellant and his other colleagues earlier recommended by the Committee were dropped

malafide to promote others, therefore, a combined application (*Annex:-B*) was submitted to Respondent No.3 on 21.10.2014, upon which comments were called from the SDEO (Male) Batagram vide letter dated 22.10.2014 (*Annex:-C*) but meanwhile the impugned Notification dated 28.10.2014 (*Annex:-D*) was issued whereby some of the colleagues of the appellant mentioned in the list *ibid*, were although promoted but the appellant was not promoted as such while Respondents No.4-9 were also promoted although they were not recommended for promotion by the Committee. The Comments were however, submitted vide letter dated 31.10.2014 (*Annex:-E*) after issuance of the impugned Notification wherein the promotion of the appellant was recommended in the light of scrutiny of the Committee *ibid*. Respondent No.3 pursuant to the Notification *ibid*, adjusted the promotees vide Notification dated 29.10.2014 (*Annex:-F*) in various schools. Subsequently vide letter dated 11.11.2014 (*Annex:-G*), the name of the appellant and others were also forwarded for promotion but invain.

4. That being aggrieved of the impugned Notification *ibid*, the appellant preferred a departmental appeal (*Annex:-H*) on 22.02.2015 to Respondent No.1 but the same was not disposed of within the statutory period of 90 days, hence this appeal *inter-alia* on the following grounds:-

**Grounds:**

- A. That Respondents have not treated appellant in accordance with law, rules and policy on subject and acted in violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973 and unlawfully issued the impugned Notification, which is unjust, unfair and hence not sustainable in the eye of law.
- B. That the appellant was not only eligible, qualified and fit for promotion rather the Committee constituted for the purpose duly recommended the appellant for promotion but subsequently the name

of the appellant was dropped and others were illegally and malafide promoted due to which the appellant was deprived of his due right, therefore, the impugned Notification is illegal and hence is not sustainable under the law.

- C. That Respondents No.4-9 were neither qualified nor eligible for the subject promotion nor their names were recommended by the Committee so constituted but inspite of all that their names were malafide forwarded for promotion and accordingly were illegally promoted vide the impugned Notification which has resulted in serious miscarriage of justice.
- D. That the promotions of Respondent No.4-9 were procured through unlawful and unfair means due to which the appellant has suffered and lost the sole opportunity of promotion to the next higher grade, therefore, the impugned Notification to the extent of Respondents No.4-9 is unwarranted, malafide and therefore, liable to be brushed aside.
- E. That appellant would like to offer some other grounds during the course of arguments.

It is, therefore, humbly prayed that the instant appeal may graciously be accepted as prayed for above.

Any other relief as deemed appropriate in the circumstances of case not specifically asked for, may also be granted to appellant.

Through

  
Appellant

  
Khaleel Rahman,  
Advocate, Peshawar

Dated: 21 / 05 / 2015

**ANNEX A**  
Promotion of PCAI to SS7(9)

5

S.No	Name	Father Name	Qualifica: 1978	Marks	Division	Name of Institute	Date of 1 <sup>st</sup> Appoin:	Date of Promotio n To Present	S.List #	Synopsis	ACR	Result	Non Inv: Cert;	BA/Bsc Degree	B.Ed Degree	M.Ed Degree
01	Arsala Khan	Mian Dad	MACT BA-74 B-Ed	475/1000 247/550 511/1000	2nd 2nd 2nd	Peshawari do do	11/11/1981	11/2/2013	11	✓	✓	✓	✓	✓	✓	✓
02	Abdul Nazeer	Nobat Khan	MA-93 BA-91 B-Ed	596/1000 285/550 511/1000	2nd 2nd 2nd	-do- -do- -do-	10/7/84	-do-	20	✓	✓	✓	✓	✓	✓	✓
03	Nisar Muhammad Khan	Bahadar Khan	BA-92 B-Ed	287/550 560/900	2nd 2nd	Peshawari AIOL	1/8/85	-do-	23	✓	✓	✓	✓	✓	✓	✓
04	Albar Ghufwan	Murteedir	BA B-Ed	542/900 557/900	2nd 2nd	AIDU AIDU	2/10/88	-do-	18	✓	✓	✓	✓	✓	✓	✓
05	M. Javed	Sareen Jan	BA B-Ed	273/550 504/1000	2nd 2nd	Peshawari do	1/10/88	-do-	17	✓	✓	✓	✓	✓	✓	✓
06	M. Javed	M. Tayyeb	BA B-Ed	477/900 519/900	2nd 2nd	AIDU do	1/10/88	do	17	✓	✓	✓	✓	✓	✓	✓

07 Hasib-ullah Shulau Haider  
MA 579/1000 2nd Hagera  
BA 59% 2nd AIDU 263/90  
B-Ed 557. 2nd AIDU -do- (95) ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓

Muhammad Tayyeb  
HMA  
GHS No.2 Battagram

Muhammad Shuaib Khan  
Principal  
4/11/2014  
GHSS Kuza Banda

A



6

Promotion of PSHT to SSTCS.

S.No	Name	Father Name	Qualifica:	Marks	Division	Name of Institute	Date of 1 <sup>st</sup> Appoin:	Date of Promotio n To Present	S.List #	BA/BSc Degree	B.Ed Degree	M.Ed Degree
68	M. Yousof	Aldur Rehman.	MA BA B.Ed	590/1100 251/550 501/1000	2nd 2nd 2nd	Peshawari do do	5/28	11/2/2012	219	✓	✓	X
09	Fazal Hadi	M. Akeem	MA BA B.Ed	205/550 486/900	2nd 2nd	Peshawari AIOU	26/12	-do-	235	✓	✓	X
			M.Ed	690/1200	2nd	AIOU	90			✓	✓	X
10	Kifayatullahi	Sherin Khan	BA B.Ed	571 557	2nd 2nd	AIOU AIOU	2/6 1988	-do-	23	✓	✓	X
11	M. Raza Shah	S. Mahmood Shah	MA M.Ed	565/1100 618/1000	2nd	Hazara AIOU	25/3 92	do	255	✓	✓	X
12	Shad Mohd.	Hazrat Younis	BA B.Ed	207/550 514/900	2nd 2nd	Peshawari AIOU	29/5/88	-do-	271	✓	✓	X
13	Javeed Khan.	Murad Khan	BA B.Ed	549 900	2nd	AIOU	3/1/93	-do-	239	✓	✓	X
14	Muhammad Tayyeb	Muhammad Tayyeb	BA	687 1100	1st	APKair uni.				✓	✓	X
			B.Ed	524/1100	2nd	AIOU	9-9-87	-do-		✓	✓	X
			B.Ed	528/1000	1st	do				✓	✓	X

6/2/2014

DMC Form  
Net.

Muhammad Shoaib Khan  
Principal  
GHSS Kuza Banda  
4/11/2014

Muhammad Tayyeb  
HM  
GHS No.2 Battagram

خدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحب (میل) منگراہم

2071  
21/10/2014

جناب عالی  
ANNEX B  
7

SET  
عنوان: درخواست برائے جانچ ٹریٹمنٹ سیاری لٹ

آداب! گزارش جہت ہے کہ ایم ڈی بیٹرز محمد کوسیف - P.S.H.T. - GPS جو نڈار اور فضل بادی  
GPS - P.S.H.T. ٹھاکوٹ کا نام S.E.T. سیاری لٹ میں بالترتیب نمبر 7 اور نمبر 8 پر تھا

اب جبکہ موجودہ لٹ میں پر دو بیٹرز کا نام غائب ہے۔ موجودہ سیاری لٹ میں  
جناب والا کی توجہ چند بے قاعدگیوں کی طرف منبہول کرانے کی جسارت کرتے ہیں۔

۱۔ یہ کہ آپ کی قائم کردہ کمیٹی برائے سیاری لٹ کی تیار کردہ لٹ میں غیر ذمہ دار  
اشخاص نے جان بوجھ کر تبدیلی کی ہے۔ جبکہ کمیٹی کے ممبران محمد شعیب صاحب، انجمنہ پریسبیل

G.H.S.S کوزہ بانڈہ اور محمد طیب صاحب G.H.S. منگراہم 2۔ کے دستخط ان کی تیار کردہ  
لٹ پر موجود ہے۔

۲۔ موجودہ لٹ پر کسی بھی ذمہ دار شخص کی دستخط نہیں ہے کہ کسی ٹیکر نے غلطی کی

۳۔ یہ کہ موجودہ لٹ میں نمبر 4 پر شامل کردہ نام لو اب سید صاحب کا جو کہ ای این ڈی ڈگری  
میں ناکال محترم ہے۔ اور نمبر 6 پر جو خود شاد محمد بیٹے لٹ میں نمبر 12 پر تھا۔ اور وہ 1992 کا بی ڈی

پاس ہے۔ جبکہ اس سے سنسٹر اسانڈہ کو نظر انداز کیا گیا ہے۔

لہذا جناب کی خدمت میں التماس کی جاتی ہے کہ اس کے بارے میں  
الضافہ خراجہ کیا جائے۔

عین توازن ہوگی  
21/10/14  
محمد کوسیف

الحاضر  
محمد کوسیف - P.S.H.T. - GPS جو نڈار - (2) فضل بادی  
GPS - P.S.H.T. ٹھاکوٹ

Certified to be True Copy



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

Phone # 0997311439 & 0997310670

*Answer C*

No: 5333 AD/Estt:/SDEO/S.L  
Dated Battagram, the October 22, 2014

8

To

The SDEO (Male)  
Battagram

Subject: Seniority List of PST

Memo:

I am directed to enclose herewith a copy of application regarding Seniority List of PST received from Muhammad Yousaf PSHT GPS Jondar and Fazal Hadi PSHT GPS Thakot which is self explanatory and to ask you to submit your comments and report in the matter please.

*20/21/10/2014*  
ADEO (Estt:)  
Battagram

Endstt: No. \_\_\_\_\_ AD/Estt:/S.L Dated Battagram, the October \_\_\_\_ 2014

Copy to the

- i. PA to DEO
- ii. Office Copy

ADEO (Estt:)  
Battagram

*Received*  
*31/10/14*  
Certified to be  
True Copy

C



Directorate of Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,  
9210437, 9210957, 9210468  
Fax 091-9210936, 0800-33857  
E-mail rafiq\_kk851@yahoo.com

9

## Notification

ANNEX D<sup>3</sup>

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24<sup>th</sup> July, 2014, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) noted against each BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted by the District Education Officer concerned on "School based".

### A. SST (Phy-Maths)

#### 1. PROMOTION OF SCT/CT TO THE POST OF SST (Phy-Maths) BPS-16

Total No. of SST Phy-Maths (M) Posts vacant Posts	26
25% share initial recruitment	7
75% share for Promotion.	19
40 % Share of promotion of SCT/CT	10
Posts available for promotion	10
Promoted through this order	03

S. No	S.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	47	Mian Gul	GHS Jambera	2/16/1968	Services placed at the disposal of DEO (M) Battagram for further posting against SST (Phy-Maths) post on school based.
2	57	Fida Hussain	GMS Merani	1/5/1968	-----do-----
3	59	Muhammad Bashir	GCMHS Battagram	4/4/1969	-----do-----

#### 2. PROMOTION OF PSHT/SPST/PST TO THE POST OF SST (Phy-Maths) BPS-16.

Total No. of SST Phy-Maths (M) Posts vacant Posts	26
25% share initial recruitment	7
75% share for Promotion.	19
20 % Share of promotion of PSHT/SPST/PST	05
Posts available for promotion	05
Promoted through this order	01

S. No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	47	Mian Gul	GHS Jambera	2/16/1968	Services placed at the disposal of DEO (M) Battagram for further posting against SST (Phy-Maths) post on school based.

### C. SST (General)

#### 1. PROMOTION OF SCT/CT TO THE POST OF SST (General) BPS-16

Total No. of SST General (M) Posts vacant Posts	48
25% share initial recruitment	7
75% share for Promotion.	41
40 % Share of promotion of SCT/CT	22

Expedit.

immediately

circles for proposals & adjustment, pl.

Approved to be  
2/10/14

Posts available for promotion  
Promoted through this order

22

22

S.N o	SL No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	1	Syed Fazal Mujeeb Shah	GHS Bilandkot	01.04.1959	Services placed at the disposal of DEO (M) Battagram for further posting against SST (General) post on school based.
2	3	Syed Gul Ali Shah	GHS Bilandkot	00.04.1961	-----do-----
3	4	Saif ur Rehman	GHS Tailoos	04.04.1965	-----do-----
4	5	Muhammad Israil	GHS Chappargram	01.05.1962	-----do-----
5	24	Abdul Wahab	GHSS Kuza Banda	01.11.1960	-----do-----
6	27	Amir Muhammad	GHSS Kuza Banda	22.04.1962	-----do-----
7	31	Banaras Khan	GCMHS Battagram	03.01.1964	-----do-----
8	32	Masoom Khan	GCMHS Battagram	04.05.1964	-----do-----
9	33	Abdul Wahab	GHS Gijbori	25.04.1961	-----do-----
10	35	Muhammad Rasool	GHS Tailoos	24.11.1960	-----do-----
11	36	Jan Muhammad	GHSS Kuza Banda	18.02.1961	-----do-----
12	43	Muhammad Fayyaz	GMS Miran	07.07.1962	-----do-----
13	45	Noor Muhammad	G. Jica Modle School Pora Bala	01.04.1965	-----do-----
14	46	Muhammad Naeem	GHS Peshora	10.01.1962	-----do-----
15	49	Haider Zaman	GHS Paimal Sharif	01.03.1956	-----do-----
16	51	Hazrat Yousaf	GHS Joze	15.09.1960	-----do-----
17	54	Abdus Salam	GHS Hill	14.10.1964	-----do-----
18	55	Hazrat Yousaf	GHS Joze	01.04.1963	-----do-----
19	58	Abdul Quddoos	GCMHS Battagram	15.11.1964	-----do-----
20	60	Bashir Ahmad	GHS Shingli Payeen	18.11.1970	-----do-----
21	61	Muhammad Nasim	GHS Thakot	15.03.1969	-----do-----
22	62	Hidaytul Haq	GMS Trand	01.10.1965	-----do-----

2. **PROMOTION OF PSHT/SPST/PST TO THE POST OF SST (General) BPS-16.**

Total No. of SST General (M) Posts vacant Posts	48
25% share initial recruitment	7
75% share for Promotion.	41
20 % Share of promotion of PSHT/SPST/PST	11
Posts available for promotion	11
Promoted through this order	11

S.N o	SL No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	11	Arsala Khan	GPS Nathu	9/8/1959	Services placed at the disposal of DEO (M) Battagram for further posting against SST (General) post on school based.
2	20	Abdul Nazeer	GPS D/Jangir	11/3/1966	-----do-----

Certified to be  
True Copy

3	22	Nazeer Muhammad	GPS Bakro Dab	10/6/1966	-----do-----
4	23	Nisar Muhammad	GPS Gid/Muh/Khan	4/10/1967	-----do-----
5	75	Tawab Said	GPS Saidara	5/3/1961	-----do-----
6	129	Shad Muhammad Khan	Khan GPS Thaya	2/19/1966	-----do-----
7	131	Muhammad Khurshid	GPS Koronaw	5/1/1968	-----do-----
8	163	Bahader Sher	Deshwal	10/15/1966	-----do-----
9	169	Ghulam Akbar	GPS Batamori	11/4/1969	-----do-----
10	172	Muhammad Javid	GPS Tamai	10/1/1969	-----do-----
11	173	Muhammad Javid	GPS Mana Gangwal	1/4/1969	-----do-----

### 3. PROMOTION OF SDM/DM TO THE POST OF SST (General) BPS-16

Total No. of SST General (M) Posts vacant Posts	48
25% share initial recruitment	7
75% share for Promotion.	41
4 % Share of promotion of SDM/DM Posts available for promotion	02
Promoted through this order	02

S.No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	22	Muhammad Afzal	GMS Pazang	5/15/1963	Services placed at the disposal of DEO (M) Battagram for further posting against SST (General) post on school based.
2	28	Inam ul haq	GMS Miran	5/5/1972	-----do-----

### 4. PROMOTION OF SAT/AT TO THE POST OF SST (General) BPS-16.

Total No. of SST General (M) Posts vacant Posts	48
25% share initial recruitment	7
75% share for Promotion.	41
4 % Share of promotion of SAT/AT Posts available for promotion	02
Promoted through this order	02

S.No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	8	Abdul Hakeem	GHS Shingli Payeen	5/4/1965	Services placed at the disposal of DEO (M) Battagram for further posting against SST (General) post on school based.
2	31	Badrul Alam	GHS Tailloos Allai	4/14/1965	-----do-----

### 5. PROMOTION OF STI/TT TO THE POST OF SST (General) BPS-16.

Total No. of SST General (M) Posts vacant Posts	48
25% share initial recruitment	7
75% share for Promotion.	41
4 % Share of promotion of STI/TT Posts available for promotion	02
Promoted through this order	02

Certified to be True Copy

S. No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	28	Anwar Zaib	GCMHS Battagram	1/5/1975	Services placed at the disposal of DEO (M) Battagram for further posting against SST (General) post on school based.
2	32	Muhammed Rafiq	GHS Peshora Battagram	3/4/1972	-----do-----

### 6. PROMOTION OF S Qari/Qari TO THE POST OF SST (General) BPS-16

Total No. of SST General (M) Posts vacant Posts	
25% share initial recruitment	18
75% share for Promotion.	7
<b>3 % Share of promotion of S Qari/Qari</b>	<b>41</b>
<b>Posts available for promotion</b>	<b>02</b>
<b>Promoted through this order</b>	<b>02</b>

S.No	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	22	Ikramullah	GHS Chappargram	5/4/1972	Services placed at the disposal of DEO (M) Battagram for further posting against SST (General) post on school based.
2	23	Rangaiz Khan	GHS Banna Allai	12/12/1975	-----do-----

### Terms and conditions:-

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining his duty.
- 7 They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he/she is wrongly promoted he/She will be reversed.
- 8 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 9 Their posting will be made on School based, They will have to serve at the place of posting, and their service is not transferable to any other station.
- 10 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.

Endst: No. / File No.2/Promotion SST B-16: Dated Peshawar the 28-10-11/2014.

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer concerned
3. District Accounts Officer concerned
4. Official Concerned.
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa Peshawar.
7. M/File

Dy: Director (Etab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

Certified to be  
True Copy

OFFICE OF THE SUB-DIVISIONAL  
EDUCATION OFFICER (MALE) E&SE  
BATTAGRAM.

NO. 1659 DATED 31-10-14

To,

ANNEX E

13

THE  
DISTRICT EDUCATION OFFICER  
MALE, E&SE, BATTAGRAM.

Subject: SENIORITY LIST OF PST  
Memorandum:

Reference your memo: No. 5333/AD/Estt/SDEO(SL) dated,  
Battagram, the, 22/10/2014 on the subject cited above.

I am directed to enclose herewith of Photo Copies of  
the applicants for reobservation and correction, however  
the information as per record are as under:-

Muhammad Yousaf PST GPS: Jondar

The teacher has working as PSMT B-15 at GPS: Jondar and  
he has at Serial No. 219 as per record of this office. He has passed  
PST Exam: on 14/11/1990. His qualification is MA/B.Ed.

Fazli Hadi PST: GPS: Thakot.

The teacher has working as PSMT, P-15 at the above School  
he has stood as Sr: No. 235 as per Seniority list of this office. He  
has passed PST: exam: on 26/12/1990. His qualification is MA/M.Ed:

You are requested to finalize in the light of list of DPC  
which has securtinzied by the following committee: Copy attached.

1. Muhammad Tayyeb. KM GHS: No-2 Battagram.
2. Muhammad Shuaib, Principal, GISS Kaza Banda. } copy enclosed

SUB-DIVISIONAL EDUCATION  
OFFICER (MALE) BATTAGRAM.

31/10/14

Certified to be  
True Copy





# OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)

## BATTAGRAM

Phone # 0997311439 & 0997310670

### NOTIFICATION

ANNEX F 14

In pursuance to the Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar Notification issued vide Endst: No.3421-25/F No.2/Promotion SST B-16 dated 28-10-2014, whereas the following SCTs/SDMs/SATs/STTs/SQaris/PSHTs promoted to the post of SST (Phy-Maths) and SST(General) BPS-16 @ Rs.10000-800-34000 plus usual allowances as admissible under the rules on regular basis under the existing policy of Provincial Government on the terms and conditions given below are further posted (on school based) at the schools as mentioned against their names with immediate effect :-

### A. SST (PHY-MATHS)

S.NO.	NAME OF TEACHER	PRESENT SCHOOL	SCHOOL WHERE ADJUSTED AS SST	REMARKS
1	Mian Gul SCT	GHS Jambora	GHS Kanai	Against v/post
2	Fida Hussain SCT	GHS Hill	GHS Hill	-----do-----
3	Muhammad Bashir SCT	GCMHS Battagram	GCMHS Battagram	Vice Consequential Adjustment
4	Atta Ullah PSHT	GPS Bish Kot	GHS Battagram	Against V/Post

### SST (GENERAL)

S.NO.	NAME OF TEACHER	PRESENT SCHOOL	SCHOOL WHERE ADJUSTED AS SST	REMARKS
1	Syed Fazal Mujeeb Shah SCT	GHS Biland Kot	GHS Biland Kot	-----do-----
2	Syed Gul Ali Shah SCT	GHS Biland Kot	GHS Biland Kot	-----do-----
3	Saif ur Rehman SCT	GHS Tailoos	GHS Karg	-----do-----
4	Muhammad Israil SCT	GHS Chappergram	GHS Battamohri	-----do-----
5	Abdul Wahab SCT	GHSS Kuza Banda	GMS D. Masha Khel	-----do-----
6	Ameer Muhammad SCT	GHSS Kuza Banda	GHSS Kuza Banda	-----do-----
7	Banaras Khan SCT	GCMHS Battagram	GHS Neelishang	-----do-----
8	Masoom Khan SCT	GCMHS Battagram	GHS Neelishang	-----do-----
9	Abdul Wahab SCT	GHS Gijbori	GHS Gijbori	-----do-----
10	Muhammad Rasool SCT	GHS Tailoos	GMS Cheeran	-----do-----
11	Jan Muhammad SCT	GHSS Kuza Banda	GHS Dagai	-----do-----
12	Muhammad Fayyaz SCT	GMS Meeran	GMS Meeran	-----do-----
13	Noor Muhammad SCT	G. JICA MPS Pora	G. JICA MPS Pora	-----do-----
14	Muhammad Naeem SCT	GHS Peshora	GHS Shamlai	-----do-----
15	Haidar Zaman SCT	GHS Paimal Sharif	GHS Trand	-----do-----
16	Hazrat Yousaf SCT	GHS Joze	GHS Joze	-----do-----
17	Abdus Salam SCT	GHS Hill	GHS Hill	-----do-----
18	Hazrat Yousaf SCT	GHS Joze	GHS Kanai	-----do-----
19	Abdul Quddoos SCT	GCMHS Battagram	GHS Batta Mohri	-----do-----
20	Bashir Ahmad SCT	GHS Shingli Payeen	GHS Shingli Payeen	-----do-----

Certified to be  
True Copy

F

21	Muhammad Naseem SCT	GHS Thakot	GHS Hatal Batkool	-----do-----
22	Hidayatul Haq SCT	GHS Trand	GHS Tikri Bandigo	-----do-----
23	Arsala Khan PSHT ✓	GPS Nathu	GHS Bilandkot	-----do-----
24	Abdul Nazir PSHT ✓	GPS D.J.Khan	GHS Joze	-----do-----
25	Nazir Muhammad PSHT ✓	GPS Bakro Dab	GHS Hill	-----do-----
26	Nisar Muhammad PSHT ✓	GPS G.M.Khan	GHS Trand	-----do-----
27	Tawab Said PSHT ✓	GPS Saidra	GMS Dirkadh	-----do-----
28	Shad Muhammad Khan PSHT ✓	GPS Thaya	GHS Biari	-----do-----
29	Muhammad Khurshid PSHT ✓	GPS Koranaw	GMS Jesol	-----do-----
30	Bahadar Sher PSHT ✓	GPS Deshwal	GMS Jambura	-----do-----
31	Ghulam Akbar PSHT ✓	GPS Battamohri	GMS Mirza Banda	-----do-----
32	Muhammad Javed PSHT ✓	GPS Tamai	GHS Deshwal	-----do-----
33	Muhammad Javed PSHT ✓	GPS Mana Gangwal	GMS Rajmera	-----do-----
34	Muhammad Afzal SDM	GMS Pazang	GMS Tandol	-----do-----
35	Inham ul Haq SDM	GHS Gijbori	GHS T.Bandigo	-----do-----
36	Abdul Hakeem SAT	GHS Shingli Payeen	GMS J.Pashto	-----do-----
37	Badrul Alam SAT	GHS Tailoos	GMS Pazang	-----do-----
38	Anwar Zaib STT	GCMHS Battagram	GMS Koshgram	-----do-----
39	Muhammad Rafiq STT	GHS Peshora	GMS Bishkot	-----do-----
40	Ikramullah SQari	GHS Chappargram	GMS Soorgai	-----do-----
41	Rangaiz Khan SQari	GHS Banna Allai	GHS Roopkani	-----do-----

### TERMS AND CONDITIONS:-

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period, in case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge reports should be submitted to all concerned.
5. Their inter-se-seniority on lower post will remain intact.
6. No TA/DA is allowed for joining their duty.
7. They will give an undertaking to be recorded in their Service Book to the effect that if any over payment is made to them in the light of this order will be recovered and if they are wrongly promoted they will be reversed.
8. Their posting will be made on school based. They will have to serve at the place of posting, and their service is not transferable to any other station.
9. Before handing over charge once again their documents may be checked if they have not the required relevant qualification as per rules, they may not be handed over charge of the post.

**Certified to be  
True Copy**

## CONSEQUENTIAL ADJUSTMENT

Syed Abdus Sattar Shah SST (Bio,Ch) GCMHS Battagram working against SST (Math, Ph) Post is consequentially adjusted at GHS Phagora against vacant post of SST (Bio,Ch) on his own pay and scale in the interest of public service with immediate effect.


16

MUHAMMAD SHAUKAT  
DISTRICT EDUCATION OFFICER  
(MALE) BATTAGRAM


Endst;No. 5399-5428/EB-II.SST Promotion. Dated the Battagram, 29-10/2014.

Copy of the above is forwarded to :-

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar w.r to his No.cited above.
2. All the Principals/Headmasters concerned schools.
3. District Accounts Officer, Battagram.
4. PS to Secretary to Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Deptt: Peshawar.
5. SDEO (Male) Battagram and Allai.
6. Budget and Accounts Officer local office.
7. Assistant Programmer EMIS local office.
8. Teachers concerned.

  
DISTRICT EDUCATION OFFICER  
(MALE) BATTAGRAM

29/10/14

  
Certified  
True Copy

No. 1681 / SDEC (M)

Date, 11/11/2014

From:

The  
Sub: Divisional Education,  
Officer (Male) Battagram.

*ANNE G*

17

To,

The  
District Education Officer,  
(Male) E&SE, Battagram.

Subject:

LIST OF PSHT B-15 FOR SST POST.

Memo:

Reference DPC, dated, 4/1/2014 for the post of SST B-16 the following PSHTs B-15 were dropped from the SST posting for which they were eligible for the same.

Now the DPC will be held on 12/11/2014 and the pending cases are hereby submitted to your honour for including in the SST list/DPC. The documents related are enclosed for ready reference.

<u>S.No.</u>	<u>Name of Teacher</u>	<u>Fathers Name</u>	<u>School</u>	<u>BPS &amp; Design</u>	<u>Remarks.</u>
1.	Muhammad Yousaf MA/B.Ed	Abdur Rehman	GPS: Jundar.	PSHT B-15	Previous DPC list No-8 but not finalize w/o any info: Previous DPC is enclosed.
2.	Fazal Hadi MA/B.Ed	Muhammad Naeem.	GPS: Thakot.	PSHT: B-15	---do-----
3.	Habibullah MA/B.Ed	Ghulam Haider "	Karbori.	PSHT:	S.No.07 of prev: DPC but dropped.

Note:

All the documents along with original Service Books of the above named officials who were already been included in the previous DPC held by the authority and securitized by the following officer.

1. Muhammad Shuaib Principal GHSS Kuza Banda
2. Muhammad Tayyeb, HM, GHS: No. 2 Battagram.

SUB: DIVISIONAL EDUCATION  
OFFICER (MALE) BATTAGRAM.

*11/11/14*

Certified to be  
True Copy

4

ANSER 4

18

خدمت جناب سیکرٹری صاحب ایلیمنٹری اینڈ سیکنڈری ایجوکیشن خیبر پختونخواہ پشاور

بوساطت: DEO: بنگرام

عنوان: حکمانہ اپیل برخلاف نوٹیفیکیشن نمبر No.342-25/F No.2/Promotion SST B-16 dated 28-10-2014

جس کی رو سے پروموشن برائے SST منظور کیا گیا ہے۔

جناب عالی! اپیل ذیل عرض ہے۔

- ۱۔ یہ کے سائل محکمہ تعلیم میں PSHT کے طور پر خدمات سرانجام دے رہا ہے محکمہ تعلیم بگرام میں ایس ایس ٹی کی 11 آسامیاں Create ہوئی تھی جس کیلئے DPC نے محکمہ کیلئے کوالیفائیڈ پرسن کی ایک میرٹ لسٹ مرتب کی اور گیارہ افراد کی لسٹ محکمہ کی حوالے کر دی۔ نقل میرٹ لسٹ لف ہذا ہے۔
  - ۲۔ یہ کے بوقت آرڈر اور پروموشن اول 6 افراد کو ایس ایس ٹی کے پر طور پر پروموشن کر دیا گیا تھا۔ اور بقایا پانچ اساتذہ میں سے سائل کو بھی ڈراپ کر کے دیگر افراد کو پروموشن کیا گیا۔
  - ۳۔ یہ کہ DPC کمیٹی مورخہ 4/1/2014 کو ہو کر میرٹ لسٹ مرتب ہو چکی تھی جبکہ غیر قانونی طور پر دیگر افراد کو لسٹ میں شامل کیا گیا کمیٹی کے DPC ارکان اس بات کے گواہان ہیں کہ ان کا بیان قلم بند ہے۔
  - ۴۔ یہ کہ سائل نے ڈسٹرکٹ ایجوکیشن آفیسر، ڈپٹی کمشنر بگرام، اسسٹنٹ کمشنر بگرام کی خدمت میں بھی اپنی درخواست پیش کی مگر ابھی تک اس پر کوئی خاطر خواہ کارروائی نہ ہو سکی درخواست ہذا کو حکمانہ طور پر آپ تک رسائی کی کوشش کی گئی مگر ایجوکیشن آفس نے بھیجے سے انکار کر رہے ہیں۔
  - ۵۔ یہ کہ جن افراد کو پروموشن کرنے کی سفارش کی گئی ہے اس میرٹ لسٹ پر کسی بھی مجاز آفیسر کی دستخط نہیں ہے۔
- لہذا استدعا ہے کہ مذکورہ پروموشن کا حکم منسوخ کر دیا کر DPC کی میرٹ لسٹ کے مطابق پروموشن کا نوٹیفیکیشن جاری فرمائی جائے۔ اور سائل کو اس کا حق دلا کر پروموشن کیا جائے۔

عین نوازش ہوگی

العارض

فضل ہادی (PSHT) GPS تھا کوٹ

22/2/15

Certified to be  
True Copy

P

18M

**LEOPARDS COURIER SERVICES PVT. LTD.**

From: *[Signature]* To: *[Signature]* 57289770 12

To: *[Signature]*

From: *[Signature]*

CASH  NO DECLARED VALUE  DATE *[Signature]* TIME  SIG.

Pieces

Weight

Price Inclusive of G.S.T. 12-00-9808-001-91

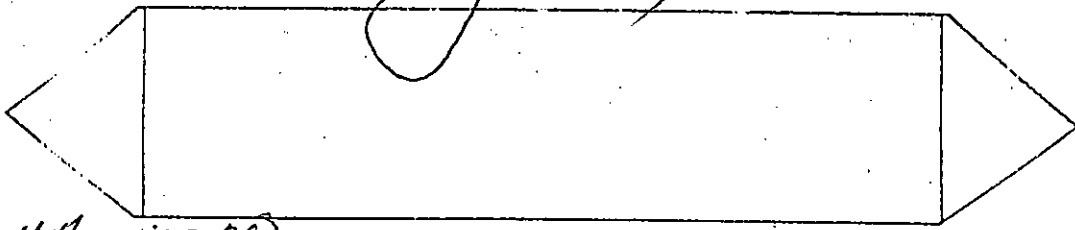
Leopards Courier

Leopards\* Accepted Above Mentioned Items on Shipper's Risk & Shipper Agreed All the Conditions Printed on Reverse

For Suggestions/Complaints Contact info@leopardcourier.com  
Now Send Gifts To Your Loved One's By Leopards LoveLine  
www.leopardcourier.com

Certified True Copy

# بعدالت موصل



5  
2012ء منجانب اسناد  
تصویر نام اصول

مورخہ  
مقدمہ  
دعویٰ  
جرم

## باعث تحریر آئینہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ  
آن مقام کیلئے

ماترہ کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوفہ مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز  
دیکر صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور سولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرا میں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
سے ایٹکس یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو کسی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ  
پر ساختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وہ کہیں صاحب پابند ہوں گے۔ کہ پیروی  
مذکور کریں۔ لہذا وکالت نامہ لکھنڈیا کہ سند ہے۔

المرقوم \_\_\_\_\_ ماہ \_\_\_\_\_ 20

واہ العبد \_\_\_\_\_  
بمقام \_\_\_\_\_ کے لئے منظور ہے۔

Handwritten signature and stamp area.

**BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER**  
**PAKHTUNKHWA CAMP COURT ABBOTTABAD**

Service Appeal No: **684 of 2015**

**Fazal Hadi.....Appellant**

**VERSUS**

**Government of Khyber Pakhtunkhwa through Secretary Education  
and others.....Respondents**

**Index**

<b>S. No</b>	<b>Description /Documents</b>	<b>Annexure</b>	<b>Pages</b>
1	Comments		1 , 2 , & 3
2	Affidavit		4
3	Policy	A	5,11
4	Seniority list	B	12,17

**Respondent**



①

**BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER**

**PAKHTUNKHWA CAMP COURT ABBOTTABAD**

Service Appeal No. 684 of 2015

Fazal Hadi .....Appellant

**VERSUS**

Government of Khyber Paktunkhwa through Secretary Education  
and others.....Respondents

**Joint Para-wise comments /Reply on behalf  
of Respondent No: 1,2 & 3.**

**Respectfully Sheweth:**

**Preliminary Objections**

1. The appellant has got no cause of action nor locus standi to file the instant petition.
2. The appellant has not come to this Honorable Court with clean hands.
3. The appellant has concealed the material facts from this Honorable Court.
4. That the departmental representation was time barred hence appeal is also time barred.

**Facts:**

1. **Correct.**
2. **Correct** to the extent that 11 vacancies were available for the promotion of PSHT/SPSTs to the posts of SSTs (G) as per rules, while the committee as mentioned in the appeal was neither for recommendation of name of the Teachers for promotion nor Departmental promotion committee 'DPC' but it was a local committee constituted by the District Education Officer (DEO) only to check the documents required for promotion and to point out the deficiency.
3. **Incorrect:** SST post is not District cadre but it is provincial cadre post and DPC is held at provincial level under the chairmanship of the

Director (E&SE)KPK only on the basis of seniority cum fitness. (copy of the policy is annexed as annexure 'A' furthermore Director (E&SE) KPK Peshawar is the competent authority for the issuance of promotion notification and no one junior to the appellant has been promoted.

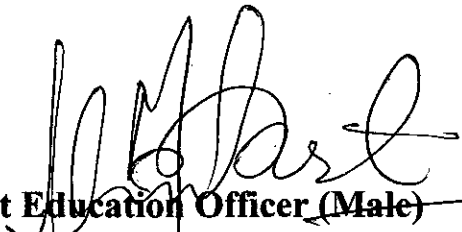
Seniority list is annexed as .....annexure 'B'.

4. No comments.

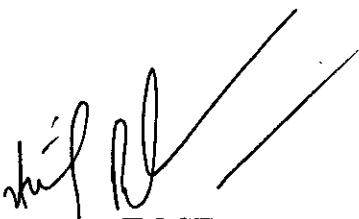
**Grounds:**

- a. **Incorrect:** Notification was issued by the competent authority according to rules and policy, and the appellant has been treated lawfully.
- b. **Incorrect:** The appellant was junior to all the promoted teachers as per seniority list, as well as Academic and professional qualification (PTC).
- c. **Incorrect.** As already mentioned above in para 2. That the committee mentioned by the appellant was constituted only to check the documents and to points out any deficiency and not for the recommendation of names for promotion more over respondents No. 4 to 9 except respondent No.6, were eligible, qualified and senior to the appellant.
- d. **Incorrect:** The promotion of respondents No.4 to 9 except respondent No.6 is lawful, fair and according to the rules and policy, While respondent No. 6 has been dropped as he was junior & his name was included due to clerical mistake. He has been replaced by next Senior & eligible PSHT namely Shah Abdul Aziz having S. No. 186 in seniority list.
- e. No Comments.

Therefore it is humbly prayed that appeal may graciously be dismissed with cost.



**District Education Officer (Male)**  
**Battagram** : **District Education**  
**Officer (M) Battagram**



**Secretary E&SE**  
**Khyber Pakhtunkhwa**



**Director of E&SE**  
**Khyber Pakhtunkhwa**  
**Director**  
**Elementary & Secondary Education**  
**Khyber Pakhtunkhwa Peshawar**

**BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER**

**PAKHTUNKHWA CAMP COURT ABBOTTABAD**

**Service Appeal No. 684 of 2015.**


**Fazal Hadi .....Appellant**

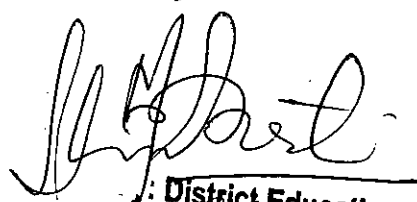
**VERSUS**

**Government of Khyber Paktunkhwa through Secretary Education  
and others**

**AFFIDAVIT**

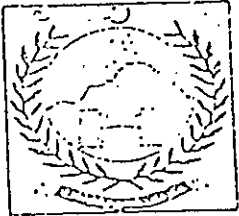
I Masoom Khan Assistant District Education officer Battagram do hereby affirm and declare on oath that content of Para-wise comments are true and correct to the best of my knowledge and belief that nothing has been concealed from this Honorable Court.

  
ADEO (Lit :) (Male)  
Battagram

c.s  
  
District Education  
Officer (M) Battagram  
Battagram

Attested  
OATH COMMISSIONER  
ABDUL SAZAM MUFTI  
Advocate High Court  
Battagram  
25/09/2015

1  
A  
5



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

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

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&L/D/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:

AMENDMENTS

In the Appendix,-

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

1	2	3	4	5
1.	Subject Specialist (BPS-17)	<p>i. At least second class Master's Degree or four years BS Degree in the relevant subject; and</p> <p>ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualification from a recognized University.</p>	23 to 35 years	<p>(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. 2.</p> <p>Note: If no suitable candidate is available in the relevant subject the post failing in their promotion quota shall be filled by initial</p>

IA	Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	22-35 years	<p>recruitment; and</p> <p>(b) fifty percent by initial recruitment.</p> <p>(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No. 3:</p> <p>Provided that if no suitable person is available from amongst Senior Physical Education Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Physical Education Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>Note:- If no suitable candidate is available in the relevant cadres of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment; and</p> <p>(b) fifty percent by initial recruitment; and</p>
----	--------------------------------------	---	-------------	--

(ii) against Serial No. 1B, as so renumbered, for the existing entries, the following shall be substituted, in respective columns, 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 M.A Education or equivalent qualifications from a recognized University.</p>	21 to 35 years.	<p>1. Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner:</p> <p>(a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion, then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(b) four per cent from amongst the Senior Drawing Masters (BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3:</p>

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

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

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

(d) four per cent from amongst the Senior Theology Teachers(BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3:



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 at 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

			<p>Primary School Head Teachers for promotion then the post shall be filled by 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 in column No.3:</p> <p>Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as such and having qualification mentioned in column No. 3; and</p> <p>(ii) Twenty Five percent by initial recruitment.</p> <p>Note:</p> <p>I. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.</p> <p>II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately."</p>
--	--	--	---

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT-

(11)

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, (PTE) Khyber Pakhtunkhwa Peshawar.
10. The Director, JSRJ 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

(ZAMIN KHAN MOMAND)  
SECTION OFFICER (PRIMARY)

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (MALE) PRIMARY BATTAGRAM

SENIORITY LIST OF PST (M) DISTRICT BATTAGRAM AS STOOD ON 31-12-2012

Sheet - M (B) 12

S.No	NAME OF SCHOOL.	NAME OF TEACHER	FATHERS NAME	DOMICILE	QUALIFICATION	Date of 1st appointment	Date of Passing PTC Exam:	Date of Birth	Joining/ Trained From/ Seniority Count From	Remarks
1	GPS Karghari	Shah Rozam	Mian Abdul Aziz	Battagram	FA/CT	10/12/1974	24/10/1974	12/12/1955	24/10/1974	
2	GPS Der Kad	Taj Muhammad ✓	Noshad Mian	Battagram	BA/CT	12/07/1974	19/03/1975	05/10/1954	19/03/1975	
3	GPS Shaukatabad	✓ Azizur Rehman	Said Muhammad Khan	Battagram	BA/CT	24/9/1975	21/10/1975	04/10/1953	21/10/1975	
4	GPS Jhangri	✓ Gul Rehman	Haqa Jan.	Battagram	MA/CT	16/10/1973	21/10/1975	08/07/1955	21/10/1975	
5	GPS Mir ali qalla	Jan Muhammad	Sharab Khan	Battagram	FA/CT	09/07/1976	21/10/1975	20/3/1955	09/07/1976	
6	GPS Shatal	✓ Syed Sultan Shah	Hazrat Shah	Battagram	BA/CT	09/07/1976	21/10/1975	13/1/1956	09/07/1976	
7	GPS Gandore	Bais kham,	Taus Khan	Battagram	BA	24/8/1978	26/8/1978	01/01/1954	26/8/1978	
8	GPS Bandabala	Niaz Muhammad	Mian Gul	Battagram	BA	21/11/1979	16/1/1978	04/10/1957	21/11/1979	
9	GPS Ajlai Sharoomb	Saif Malok ✓	Ghulam Jalni	Battagram	FA/CT	17/10/1980	30/9/1980	30/4/1962	17/10/1980	
10	GPS Batkol Qallo	Unar Dad	Zewar Khan	Battagram	FA/CT	11/12/1981	20/9/1981	01/02/1962	11/12/1981	
11	GPS Nathu	✓ Arsala Kahn	Mian Dad	Battagram	MA/B.Ed	13/11/1981	30/9/1981 ✓	08/09/1959	13/11/1981 ✓	
12	GPS Nathu	✓ Abdul Wahid Shah	Abdul Qadir Shah	Battagram	BA/CT	13/11/1981	30/8/1981	03/03/1963	13/11/1981	
13	GPS Batangi	✓ Amanullah	Muhammed Gul	Battagram	FA/CT	13/11/1981	30/9/1981	04/02/1963	13/11/1981	
14	GPS Batangi	Abdul Hakem	Molvi Abdul Aziz	Battagram	FA/CT	14/11/1981	20/9/1981	03/01/1963	14/11/1981	
15	GPS Batangi Hill	✓ M. Nasim Khan	Sarfaraz Khan	Battagram	FA/CT	10/08/1982	30/9/1982	30/12/1958	10/08/1982	
16	GPS Batangi Hill	✓ Shad Muhammad	Fida Muhammad	Battagram	BA/CT	10/09/1982	30/9/1982	01/01/1965	10/09/1982	
17	GPS Dreb Qallah	✓ Haji Muhammad	Hukmat Khan	Battagram	FA/CT	08/08/1979	14/9/1983	06/06/1954	14/9/1983	
18	GPS Ashare Kaley	Muhammad Haroon	Juma Khan	Battagram	FA	25/10/1983	09/10/1984	03/03/1963	09/10/1984	
19	GPS Banda Bala	Naiz Muhammad	Khan Mohamud	Battagram	BA	10/07/1984	09/10/1984	01/01/1964	10/07/1984	
20	GPS Landai	✓ Abdul Nazir	Nobat Khan	Battagram	M/A/B.Ed	10/07/1984	09/10/1984 ✓	03/11/1966	10/07/1984 ✓	07/10/1984
21	GPS Keza Banda	Gul Faroz kham	Abdul Latif kham	Battagram	FA/CT	10/07/1984	09/10/1984	14/4/1966	10/07/1984	
22	GPS Bakro dub	✓ Nazir Muhammad	Fida Muhammad	Battagram	MA/CT/BE	08/01/1985	15/6/1985 ✓	06/10/1966	15/6/1985 ✓	
23	GPS Gidri Muhammad kham	Nisar Muhammad Kham	Bahadar kham	Battagram	BA/CT/BE	08/01/1985	15/6/1985 ✓	10/4/1967	15/6/1985 ✓	
24	GPS Koshgram	✓ Abdul Malik	Gohar Rehman	Battagram	BA/CT	17/5/1981	20/8/1985	26/6/1962	20/8/1985	
25	GPS Sakhalii Banda	Elyas Khan	Moscel Khan	Battagram	FA/CT	21/5/1977	12/05/1985	10/02/1954	12/05/1985	
26	GPS Khara	Abdul Latif	Abdul malaik	Battagram	FA/CT	08/01/1985	31/12/1985	01/02/1966	31/12/1985	
27	GPS Laghari	Amanullah	Shamraza	Battagram	FA	29/9/1981	07/01/1985	04/04/1965	07/01/1985	
28	MOS Kalash	Abdul Wahid	Abdul Jalil	Battagram	FA	12/08/1979	13/7/1986	06/04/1961	13/7/1986	
29	GPS Faqiro	✓ Kham Gul	Kali Ahmed	Battagram	FA/CT	08/08/1979	14/7/1986	01/02/1955	14/7/1986	
30	GPS Etang srif said	Syed Muhammad Qesersshah	Shah Mader	Battagram	FA/CT	29/5/1980	14/7/1986	01/08/1955	14/7/1986	
31	GPS Dinkad	✓ Abdul Manan	Abdul Khaliq	Battagram	FA/CT	19/11/1979	14/7/1986	05/09/1956	14/7/1986	

71	GPS	Nogram.	Abdur Rashid	H.Mutarab	Battagram	FA/CT	01/07/1981	26/5/1987	22/7/1958	26/5/1987
72	GPS	Biari	Umar Farooq	Ghulam Rasool	Battagram	FA/CT	01/10/1982	26/5/1987	07/09/1959	26/5/1987
73	GPS	Bala delat khan	Duraj Khan ✓	Dulat khan	Battagram	FA	08/08/1979	26/5/1987	14/2/1960	26/5/1987
74	GPS	Kolai Hill	Bara Khan ✓	Khaliq Dad Khan	Battagram	FA/CT	20/12/1981	26/5/1987	03/02/1960	26/5/1987
75	GPS	Karin Pora	Tawab Said ✓	Muhammad Mustafa	Battagram	MA/Edu f.	25/12/1981	26/5/1987 ✓	03/05/1961	26/5/1987 ✓
76	GPS	Gurati ashary	Anwar Zab	Abdus Sattar	Battagram	FA/CT	29/12/1981	26/5/1987 ✓	04/10/1961	26/5/1987
77	GPS	Koshgram.	Shamsuddin	Said Mian	Battagram	FA/CT	20/12/1981	26/5/1987	21/4/1961	26/5/1987
78	GPS	Asharban	Abdul Hamid D	Habib Hayat ✓	Battagram	FA	01/06/1982	26/5/1987	26/4/1961	26/5/1987
79	GPS	Kot	Akbar khan ✓	Jalal khan	Battagram	FA/CT	06/08/1981	26/5/1987	05/08/1961	26/5/1987
80	GPS	Shaltay	Ghulam Jelani ✓	Muhammad Ibrahim	Battagram	FA/CT	20/8/1982	26/5/1987	09/09/1961	26/5/1987
81	GPS	Gijbori	Husnul Wahab	Alamgir khan	Battagram	MA/CT	14/5/1981	26/5/1987	02/03/1962	26/5/1987
82	GPS	Bengo Banda	Muhamad Khteeb ✓	Mustafa	Battagram	FA/CT	01/06/1982	26/5/1987	03/07/1962	26/5/1987
83	GPS	Laghri Sar Pamjan	Muhammad Namroz	Muhammad Ayan	Battagram	FA/CT	01/06/1982	26/5/1987	12/07/1961	26/5/1987
84	GPS	Kund	Musharaf Shah	Noshad Mian ✓	Battagram	MA/CT	11/08/1983	26/5/1987	15/3/1962	26/5/1987
85	GPS	Kanshai	Ali Afzal ✓	Sher Ali Khan	Battagram	BA/CT	24/3/1982	26/5/1987	15/4/1962	26/5/1987
86	GPS	Kass Noigram	Tawar Jan	Muhammad Yousaf	Battagram	FA	01/06/1982	26/5/1987	08/07/1962	26/5/1987
87	GPS	Laghri sar nasim	Abdul Mukaram	Abdul Hanan ✓	Battagram	FA	01/06/1982	26/5/1987	08/10/1962	26/5/1987
88	GPS	Chita Bata	Nisar Muhammad Khan ✓	Anwar Zeb Khan	Battagram	FA	30/3/1981	26/5/1987	01/01/1963	26/5/1987
89	GPS	Dabona	Nawab Khan	Rushan Khan	Battagram	FA/CT	03/08/1982	26/5/1987	03/01/1963	26/5/1987
90	GPS	Banna	Muhammad Yaqob	Abdul Qayyum ✓	Battagram	BA/CT	26/5/1983	26/5/1987	05/09/1963	26/5/1987
91	GPS	Kishal	Abdul Wahid	Abdul Wadood	Battagram	FA	21/5/1981	26/5/1987	16/5/1963	26/5/1987
92	GPS	Kani	Shamsullah	Murshid Alam	Battagram	BA/CT	24/11/1983	26/5/1987	06/11/1963	26/5/1987
93	GPS	Karag Bala	Muhammad Zareen	Lal Muhammad ✓	Battagram	FA/CT	20/12/1981	26/5/1987	07/01/1963	26/5/1987
94	GPS	Tarno	Abdul Qayum	Janis Khan	Battagram	FA	01/10/1982	26/5/1987	09/01/1963	26/5/1987
95	MOS	Wasma Naryala	Gui Faraz Khan	Aftab	Battagram	FA	05/01/1983	26/5/1987	25/12/1963	26/5/1987
96	GPS	Kassai Tandoel	Abdul Manan ✓	Taj Malook	Battagram	BA/CT	01/06/1982	26/5/1987	01/02/1964	26/5/1987
97	GPS	Tandel	Shamsur Rehman ✓	Shamshair	Battagram	FA/CT	01/06/1982	26/5/1987	03/02/1964	26/5/1987
98	GPS	Mashkeney.	Khurshseed Muhamad ✓	Abdul Ghani	Battagram	BA/CT	22/11/1983	26/5/1987	04/01/1964	26/5/1987
99	GPS	Kasey	Azizur Rehman	Muhammad Ensa Khan ✓	Battagram	BA/CT	21/5/1983	26/5/1987	19/4/1964	26/5/1987
100	GPS	Banda chani said	Anwar hussin	Habib said	Battagram	FA	14/3/1983	26/5/1987	12/01/1964	26/5/1987
101	GPS	Mirani	Muhammad Hussain ✓	Muhammad Akbar	Battagram	FA/CT	21/4/1984	26/5/1987	02/02/1965	26/5/1987
102	GPS	Sardana Sar	Gul Faredon ✓	Dibar	Battagram	FA/CT	10/07/1984	26/5/1987	25/3/1965	26/5/1987
103	GPS	D'Changil	Nazir ur Rehman	Taus Khan	Battagram	BA/CT	16/4/1983	26/5/1987	04/10/1965	26/5/1987
104	GPS	Gabrel	Niaz Muhammed ✓	Shana Bar	Battagram	FA/CT	12/12/1983	26/5/1987	04/11/1965	26/5/1987
105	GPS	Tailasa	Fareheen ✓	Sarbaz Khan	Battagram	FA/CT	10/07/1984	26/5/1987	03/01/1966	26/5/1987
106	GPS	Bango Banda	Samiullah ✓	Zajan	Battagram	FA/CT	10/07/1984	26/5/1987	01/05/1967	26/5/1987
107	GPS	Shamici	Raj Muhammad ✓	Abdul Malik	Battagram	FA/CT	08/01/1985	27/6/1987	03/05/1959	27/6/1987
108	GPS	Hill	Syed Tariq Shah ✓	S.Mujtaba Shah	Battagram	FA/CT	30/7/1987	27/6/1987	08/08/1966	30/7/1987
109	GPS	Jatba	Muhammad Akbar ✓	Muhammad Feroz	Battagram	FA/CT	08/01/1987	27/6/1987	01/03/1967	08/01/1987

18

pass 1  
P.T.C.

19

110	GPS	Lundi	Muhammad Fayyaz	Mir Afzal	Battagram	FA/CT	08/01/1987	27/6/1987	06/01/1967	08/01/1987	
111	GPS	Ajmera	Zeenat Khan	Shahdad Khan	Battagram	FA/CT	08/01/1987	27/6/1987	04/04/1968	08/01/1987	
112	GPS	Bar Tandool	Yar Muhammad	Ahmad Jan	Battagram	FA	08/01/1987	27/6/1987	04/03/1969	08/01/1987	
113	GPS	Ganatar	Niaz Muhammad	Muhammad Jabeen	Battagram	FA/CT	08/02/1987	27/6/1987	28/4/1967	08/02/1987	
114	GPS	Karwar	Niaz Muhammad	Samandar Khan	Battagram	FA/CT	08/04/1987	27/6/1987	02/09/1966	08/04/1987	
115	GPS	Soorgai	Khail Muhammad	Faiz Muhammad	Battagram	FA	08/04/1987	27/6/1987	04/09/1966	08/04/1987	
116	GPS	Shamano Seri	Muhammad Sadiq	Muhammad Amin	Battagram	FA/CT	08/04/1987	27/6/1987	04/11/1969	08/04/1987	
117	GPS	Dhnga	Abdul Karim	Hussain Khan	Battagram	FA/CT	23/8/1987	27/6/1987	28/5/1966	23/8/1987	
118	GPS	Banna	Habibullah	Saleh Muhammad	Battagram	BA/CT	09/01/1987	27/6/1987	24/4/1966	09/01/1987	
119	GPS	satram	Ahmad Hassan ✓	Ghawar Khan	Battagram	FA	09/09/1982	19/11/1987	04/10/1961	19/11/1987	
120	GPS	Kohani	Muhammd Fazil	Muhammad Ayyub	Battagram	FA/CT	15/8/1977	29/11/1987	17/12/1952	29/11/1987	
121	GPS	Sooragi	Bais khan,	Babozay	Battagram	FA/CT	02/07/1982	29/11/1987	14/2/1958	29/11/1987	
122	GPS	Kanshai	Hafizur Rehman	Muhammad Yunis	Battagram	FA	01/06/1982	29/11/1987	02/02/1959	29/11/1987	
123	GPS	Kannai	Zar Mohammad	Attorab khan	Battagram	FA/CT	01/08/1983	29/11/1987	01/01/1963	29/11/1987	
124	MOS	Sofian	Muhammad Iqbal ✓	Abdul Qayum	Battagram	FA	03/03/1982	29/11/1987	05/12/1963	29/11/1987	
125	GPS	Rupkani	Shah Hunar	Jangir khan	Battagram	FA/CT	01/04/1983	29/11/1987	15/8/1964	29/11/1987	
126	GPS	Khwar Musa Tangi	Muhammad Nabi	Abdul Ghani	Battagram	FA/CT	10/07/1984	29/11/1987	02/01/1965	29/11/1987	
127	GPS	Nal Pashto	Bakhtiar Khan	Baduizaman Khan	Battagram	FA/CT	07/01/1987	12/01/1987	04/05/1961	12/01/1987	
128	GPS	Nal Pashto	Muhammad Ayyub	Abdul Wahab	Battagram	FA	09/12/1987	02/10/1988	03/09/1963	02/10/1988	
129	GPS	Bateela	Shad Muhammad ✓	Malai ✓	Battagram	BA/BA	09/05/1987	02/10/1988	01/01/1965	02/10/1988	
130	GPS	Kmri	Mumtoz Ali shah ✓	M Shib shah	Battagram	FA/CT	09/10/1987	09/10/1988	06/02/1965	09/10/1988	
131	GPS	Bar Neahar	Muhammad Khaushed ✓	Abdul Malik	Battagram	BA/CT/BA	09/10/1987	09/10/1988	01/05/1968	09/10/1988	10/9/1987
132	GPS	Batella	Anwarzeb	Faqir Muhammad	Battagram	FA	09/12/1987	02/10/1988	09/09/1968	02/10/1988	
133	GPS	Tarnawo Miadan	Javed Khan	Muhammad Imran	Battagram	FA/CT	09/10/1987	02/10/1988	03/02/1969	02/10/1988	
134	GPS	Mattanilishang	Muhammad Naeem	Jehanzeb.	Battagram	FA/CT	09/09/1987	03/10/1988	02/12/1959	03/10/1988	
135	GPS	Kamala	Minhaj	Abdul Qayyum	Battagram	B/A	05/05/1986	07/01/1988	05/11/1960	07/01/1988	
136	GPS	Galshoot	Bakht Shaman	Khatab khan	Battagram	FA/CT	16/5/1985	07/01/1988	11/11/1965	07/01/1988	
137	GPS	Kuzz Tandol	Muhammad Ghffar	M Mussa	Battagram	FA/CT	10/12/1977	08/01/1988	01/01/1957	08/01/1988	
138	GPS	Benna	Samiullah	Ghulam sarwar	Battagram	FA	21/9/1983	08/01/1988	02/02/1957	08/01/1988	
139	GPS	Chanjilj	Akber khan	Mulang khan	Battagram	FA	20/11/1984	08/01/1988	06/08/1958	08/01/1988	
140	GMS	Pashto	Muhammad Fareed	Alem Gul	Battagram	FA/CT	23/7/1985	08/01/1988	03/02/1962	08/01/1988	
141	GPS	Jdg	Atta Muhammad	Sabir khan	Battagram	BA	20/11/1984	08/01/1988	04/09/1962	08/01/1988	
142	GPS	Ranja	Aman khan ✓	Tahmos khan	Battagram	FA	06/02/1984	08/01/1988	16/4/1962	08/01/1988	
143	GPS	Batta Mori	Noorul Islam	Abdur Rehman	Battagram	FA	20/11/1983	08/01/1988	03/01/1963	08/01/1988	
144	GPS	Largram	Ubiadulla	Atiqulla	Battagram	FA/CT	06/06/1985	08/01/1988	03/01/1963	08/01/1988	
145	GPS	Jhangri	Muhammad Farooq	Muhamad Ayyub	Battagram	BA/CT	04/09/1986	08/01/1988	25/4/1963	03/01/1968	
146	GPS	Thakote	Ali Akbar	Fazal Qadem	Battagram	BA	01/06/1982	08/01/1988	09/08/1963	08/01/1988	
147	MOS	Kalash	Faqir Muhammad	Bara Khan	Battagram	FA/CT	19/10/1984	08/01/1988	01/01/1964	08/01/1988	
148	GPS	Jaba Shahtoot	Muhammad Younas	Barra Khan	Battagram	BA/CT	01/06/1982	08/01/1988	04/06/1964	08/01/1988	

149	GPS	Nika choohan	Afzal Shah	Mahmood Shah	Battagram	BA/CT	26/12/1984	08/01/1988	05/01/1964	08/01/1988	
150	GPS	Jangri	Anwaer Ziab	Sardarey	Battagram	FA/CT	06/03/1984	08/01/1988	05/05/1964	08/01/1988	
151	GPS	Kaza Bando	Faida Mohd	Faroz khan	Battagram	FA	30/5/1982	08/01/1988	04/10/1965	08/01/1988	
152	GPS	Takia	Khwaja awaz khan	Dost Muhammad	Battagram	BA/CT	06/07/1984	08/01/1988	13/4/1965	08/01/1988	
153	GPS	Kiari	Ali Rehman	Abdul Rahim	Battagram	FA	12/03/1984	08/01/1988	05/05/1965	08/01/1988	
154	GPS	Trangar	Suba Khan	Amir Khwaja	Battagram	FA/CT	12/10/1984	08/01/1988	13/12/1965	08/01/1988	
155	GPS	Jambora	Mohammad Khan	Attai khan	Battagram	FA	16/5/1985	08/01/1988	01/01/1966	08/01/1988	
156	GPS	Sarbanjar	Mujahid	Ali Gohar	Battagram	BA	22/5/1985	08/01/1988	02/07/1966	08/01/1988	
157	GPS	Sorangai	Muhammad Fayaz	Abdul Latif	Battagram	PA/CT	28/4/1986	08/01/1988	04/02/1966	08/01/1988	
158	GPS	Samal mara	Dilbar khan	Khadi khan	Battagram	FA/CT	29/5/1985	08/01/1988	05/05/1966	08/01/1988	
159	GPS	Dabri	Habibullah	Gul Muhammad	Battagram	FA/CT	19/11/1984	08/01/1988	12/10/1966	08/01/1988	
160	GPS	Taya	Rafiullah	Mohammad Mustafa	Battagram	FA	29/4/1986	08/01/1988	25/2/1968	08/01/1988	
161	GPS	Kassai Tandoor	Muhammad Saleem	Gul Muhammad	Battagram	FA/CT	30/4/1986	08/01/1988	04/10/1968	08/01/1988	
162	GPS	Soorgai	Fazli Bari	Molvi Mohd Saeed	Battagram	FA/CT	10/01/1988	17/9/1988	03/03/1965	10/01/1988	
163	GPS	Sijbair	Bahadar Sher	Guli Bagh	Battagram	BA/B.Ed	10/01/1988	17/9/1988	15/10/1966	10/01/1988	01/10/1988
164	GPS	Nehrai	Jan Muhammad	Abdul Khaliq	Battagram	FA/CT	10/01/1988	17/9/1988	03/03/1967	10/01/1988	
165	GPS	Garang	Muhammad Anwar	Abdul Khaliq	Battagram	FA	10/01/1988	17/9/1988	16/4/1969	10/01/1988	
166	GPS	Bar Sar	Muhammad Yar	Muhammad Umar	Battagram	FA/CT	10/01/1988	17/9/1988	03/04/1970	10/01/1988	
167	GPS	Jabba	Amanullah	Hussain Khan	Battagram	FA/CT	10/02/1988	17/9/1988	01/01/1961	10/02/1988	
168	GPS	Yaro	Niaz Muhammad	Taloot Khan	Battagram	FA	10/02/1988	17/9/1988	09/04/1964	10/02/1988	
169	GPS	Battamori	Ghulam Akbar	Jehangir Khan	Battagram	BA, B.Ed	10/02/1988	17/9/1988	04/11/1969	10/02/1988	02/11/1988
170	MOS	Kark Chaiyar	Muhammad Rahim	Muqtadir	Battagram	FA/CT	10/03/1988	17/9/1988	15/11/1967	10/03/1988	
171	GPS	d/muzamil shah	Syed Hassan Shah	Afsar Khan	Battagram	FA/CT	10/03/1988	17/9/1988	03/10/1968	10/03/1988	
172	GPS	Kassai Tandoor	Muhammad Javed	Ghulam Nabi	Battagram	BA/B.Ed I	10/03/1988	17/9/1988	01/10/1969	10/03/1988	03/10/1988
173	GPS	Kareen Sekargah	Muhammad Javed	Sareen Jan	Battagram	BA/B.Ed I	10/03/1988	17/9/1988	04/01/1969	10/03/1988	03/10/1988
174	GPS	Matta Manscor	Fozal Wahab	Muhammad Tayyeb	Battagram	FA/CT	10/03/1988	17/9/1988	05/08/1969	10/03/1988	
175	MOS	Kargari	Noor Nabi Shah	Ghulam Umar	Battagram	FA/CT	10/04/1988	17/9/1988	01/01/1969	10/04/1988	
176	GPS	Sheshal	Ghulam Yousaf	Ghulam Jan	Battagram	FA	21/11/1988	26/8/1987	01/02/1968	21/11/1988	
177	GPS	Biari	Umar Jan	Ghulam Muhammad	Battagram	FA/CT	13/4/1981	31/1/1989	04/12/1963	31/1/1989	
178	GPS	Nehar Bala	Safiulla	Pamjan	Battagram	FA/CT	10/11/1988	26/8/1989	13/6/1962	26/8/1989	
179	GPS	Kiari	Bukhtiar Khan	Redulla	Battagram	FA	10/12/1988	26/8/1989	12/06/1964	26/8/1989	
180	GPS	Dabri Kandow	Alamgir Khan	Abdul Razzaq	Battagram	FA	10/10/1988	26/8/1989	02/04/1966	26/8/1989	
181	GPS	Charin Mar	Muhammad Fareed	Jamal Khan	Battagram	FA	15/10/1988	26/8/1989	03/10/1967	26/8/1989	
182	GPS	Chanjil	Mihraj	Muhammad Wahhab	Battagram	FA	10/11/1988	26/8/1989	16/10/1967	26/8/1989	
183	GPS	Jhangri	Inayatul Haq	Imran	Battagram	FA	24/11/1988	26/8/1989	14/1/1968	26/8/1989	
184	GPS	Gidri Tali mohd khan	Abdul Qadir	Sultan Akbar	Battagram	FA/CT	10/11/1988	26/8/1989	04/08/1968	26/8/1989	
185	GPS	Shad Bagh	S.Noor Nabi Shah	Bahadar khan	Battagram	FA	23/11/1988	26/8/1989	26/5/1968	26/8/1989	
186	GPS	Ali Sheria	Shah Abdul Aziz	Azmat Shah	Battagram	BA/B.Ed	10/11/1988	26/8/1989	20/03/1970	26/8/1989	
187	GPS	Laghri Karin	Akhtar Munir	Mir Azam Shah	Battagram	BA/CT/B.Ed	22/11/1988	26/8/1989	12/01/1970	26/8/1989	

188	GPS	Drtab Qala	Abdul Ghafar	Ferdos Khan	Battagram	Fa	13/10/1988	17/9/1989	03/06/1969	17/9/1989	
189	GPS	Kote	Muhammad Sherin	Dost Muhammad	Battagram	FA	01/06/1982	17/1/1990	20/8/1957	17/1/1990	
190	GPS	Loy Kaly gantar	Hidatur Arehman	Ibrar Mian	Battagram	FA	24/3/1985	17/1/1990	15/10/1965	17/1/1990	
191	GPS	Nehrai	Abdur Rashied	Roshan Khan	Battagram	FA/CT	10/11/1988	17/1/1990	03/10/1966	17/1/1990	
192	GPS	Shgy paye	Wazir Muhammad Khan	Namroz Khan	Battagram	BA	26/3/1990	17/1/1990	04/09/1967	26/3/1990	
193	GPS	Qilla Shakir Khan	Muhammad Saeed	Qari Muhammad Sharif	Battagram	BA	26/3/1990	01/01/1990	04/02/1968	26/3/1990	✓
194	GPS	Kucha Rangen Abad	Khatib Muhammad	Abdul Ghani	Battagram	MA/CT	26/3/1990	17/1/1990	06/01/1968	26/3/1990	
195	GPS	Karbori	Habibullah	Gullam Haidir	Battagram	MA/B.Ed	26/3/1990	17/1/1990	01/01/1969	26/3/1990	✓
196	GPS	Bojri	Muhammad Nawaz	Aleemullah	Battagram	FA	26/3/1990	17/1/1990	01/02/1969	26/3/1990	
197	GPS	Chari Bala	Waris Khan	Esso Khan	Battagram	BA	26/3/1990	17/1/1990	02/09/1969	26/3/1990	
198	GPS	Sandasary Kakarshang	Ajab Khan	Sher Muhammad	Battagram	FSc	26/3/1990	01/01/1990	03/10/1969	26/3/1990	
199	GPS	Daboona	Abdur Razzaq	Said Faqir	Battagram	FA	26/3/1990	01/01/1990	14/6/1969	26/3/1990	
200	GPS	Jamroz Gada	Muhammad Shahid	Muhammad Farid	Battagram	MA	26/3/1990	01/01/1990	19/2/1971	26/3/1990	
201	GPS	C/Rsool Khan	Bakhtiar	Roshan Khan	Battagram	FA	26/3/1990	01/01/1990	04/01/1971	26/3/1990	
202	GPS	Landi noman abad	Muhammad salim	Hakim Khan	Battagram	FA	27/3/1990	01/10/1990	06/06/1967	27/3/1990	
203	GPS	Kobai	Jalal Khan	Muhammad Zaman	Battagram	FA	27/3/1990	01/01/1990	04/05/1969	27/3/1990	
204	GPS	Simal mara	Minhajudin	Abdul Akbar	Battagram	BA	27/3/1990	01/10/1990	09/11/1969	27/3/1990	
205	GPS	Phogora	Abdul Naseer	Muhammad Imran	Battagram	FA	27/3/1990	01/01/1990	20/4/1970	27/3/1990	
206	GPS	Ajlai Shah e-Room	Muhammad Riaz	Shahrozam	Battagram	MA <i>1.Red</i>	04/01/1990	04/01/1990	15/8/1971	04/01/1990	
207	GPS	Kachal	Akbar Khan	Azim Khan	Battagram	BA	16/4/1990	17/1/1990	03/03/1965	16/4/1990	
208	GPS	Kakti	Khan Muhammad	Ming Khan	Battagram	FA	16/4/1990	20/1/1990	05/04/1968	16/4/1990	
209	GPS	Karsu Pashto	Yusaf Khan	Hatam Khan	Battagram	FA	16/4/1990	01/01/1990	03/01/1969	16/4/1990	
210	GPS	Kachal	Sher Gulab	Bais Khan	Battagram	FA	16/4/1990	17/1/1990	01/01/1970	16/4/1990	
211	GPS	Addayi Hatal	Alam Zab	Ghulam Haider	Battagram	FA	16/4/1990	17/1/1989	08/12/1970	16/4/1990	
212	GPS	Garang	Bakht Nawaz	Shirdad	Battagram	FA	16/4/1990	01/01/1990	04/08/1971	16/4/1990	
213	GPS	Batkul Sarhadi	Muhammad Sardar	Pir Muhammad	Battagram	BA/CT	04/02/1986	14/11/1990	27/10/1958	14/11/1990	
214	GPS	Ghurty	Muhammad Salim	Bahader khen	Battagram	FA	06/08/1984	14/11/1990	04/12/1959	14/11/1990	
215	GPS	Ajamera	Muhammad Ayyub	Ahmad Jan	Battagram	B/A	05/05/1986	14/11/1990	15/4/1962	14/11/1990	
216	GPS	Kara Pora	Gul Zarin	Said Qahar	Battagram	BA/CT	10/11/1988	14/11/1990	05/02/1964	14/11/1990	
217	GPS	Bora Hatal	Ghazi Khan	Munawar Khan	Battagram	FA	10/11/1988	14/11/1990	11/01/1964	14/11/1990	
218	GPS	Changal	Mian Zarin	Usman Zar	Battagram	BA/CT	10/11/1988	14/11/1990	15/7/1965	14/11/1990	✓
219	GPS	Bishlate	Muhammad Yousaf	Abdul Rehman	Battagram	BA/B.Ed	05/08/1986	14/11/1990	15/8/1965	14/11/1990	
220	GPS	Derkad	Muhammad Azhar	Sadar Khan	Battagram	BA/CT/BA	04/03/1986	14/11/1990	10/04/1965	14/11/1990	
221	GPS	Safroona	Muhammad Yousaf	Mir Malik	Battagram	FA/CT	04/08/1986	14/11/1990	15/4/1966	14/11/1990	
222	GPS	...	...	...	Battagram	MA	10/11/1988	14/11/1990	14/8/1966	14/11/1990	
223	GPS	Husani	Tukal Khan	Abdul Satar	Battagram	FA/CT	15/3/1986	14/11/1990	04/01/1967	14/11/1990	
224	GPS	Derkad	Muhammad Amir	Muhammad Kabeer	Battagram	MA/CT	20/3/1986	14/11/1990	07/03/1967	14/11/1990	
225	GPS	Sakargah	Dost Muhammad	Sher Muhammad	Battagram	FA/CT	10/12/1988	14/11/1990	03/03/1968	14/11/1990	
226	GPS	Pirhari	Said Ashraf Shah	Muhammad Irshad	Battagram	FA/CT	21/11/1988	14/11/1990	05/10/1968	14/11/1990	



227	GPS	Barsakanga	Gul Bashir	Shozada Khan	Battagram	BA	21/11/1988	14/11/1990	06/06/1968	14/11/1990	
228	GPS	Drab Qala	Abdur Rehim	Abdur Rahman	Battagram	FA	26/11/1988	14/11/1990	04/01/1969	14/11/1990	
229	GPS	Noshera	Safa Gul	Qadar Gul	Battagram	FA/CT	20/11/1988	14/11/1990	04/08/1970	14/11/1990	
230	GPS	Garang	Saleh Muhaminad	Mumammad Usman	Battagram	FA/CT	21/11/1988	14/11/1990	20/5/70	14/11/1990	
231	GPS	Kandar	Gul Muhammad	Anwar Gul	Battagram	FA	12/02/1990	04/01/1990	02/10/1966	12/02/1990	
232	GPS	Amluk Banda	Sharif Khan	Niamat Khan	Battagram	FA	12/03/1990	14/11/1990	01/01/1967	12/03/1990	
233	GPS	Loy Kaly gantar	Shah Atiullah	Jangir Shah	Battagram	BA/CT	12/06/1990	14/11/1990	08/05/1970	12/06/1990	
234	GPS	Toba Pashto	Wali Muhammad	Wasol Khan	Battagram	FA	16/12/1990	14/11/1990	02/01/1969	16/12/1990	
235	GPS	Bilyani	Fazal Hadi	Muhammad Naeem	Battagram	MA/M.Ed	26/12/1990	29/11/1990	01/12/1970	26/12/1990	
236	GPS	Rupkani	Muhammad Afzal	Aleemullah	Battagram	MA/B.Ed	30/3/1988	16/3/1991	08/04/1966	16/3/1991	
237	GPS	Koshgram	Ubardullah	Muzafar Khan	Battagram	BA/CT	31/3/1988	16/3/1991	25/12/1967	16/3/1991	
238	GPS	Rupkani	Zahir Muhammad	Sijawal Khan	Battagram	FA	29/3/1988	16/3/1991	21/6/1969	16/3/1991	
239	GPS	Sarmast	Ahmad Nabi	Abdul Haq	Battagram	FA	15/5/1983	22/10/1991	04/01/1962	22/10/1991	
240	GPS	Shagai	Jehanzeb	Ali Gohar	Battagram	FA	03/07/1988	22/10/1991	04/01/1962	22/10/1991	
241	GPS	Jabri Sakarg	Siafur Rehman	Noor Mail	Battagram	FA	05/04/1986	22/10/1991	18/2/1963	22/10/1991	
242	GPS	Tummai	Feiz Muhammad Khan	Mir Afzal	Battagram	FA	10/11/1988	22/10/1991	01/03/1965	22/10/1991	
243	GPS	Gari nawab said	Wahid Said	Nawab said	Battagram	FA	06/11/1987	22/10/1991	20/6/1965	22/10/1991	
244	GPS	Samal mara	Muhammad Rustam	Essa Khan	Battagram	BA	27/11/1988	22/10/1991	01/06/1966	22/10/1991	
245	GPS	Gantar	Shafiul Haq	Saeedul Haq	Battagram	FA	24/6/1987	22/10/1991	02/02/1966	22/10/1991	
246	GPS	C/Battagram	Muhammad Nawaz Khan	Hakim Khan	Battagram	FA	05/05/1986	22/10/1991	04/02/1966	22/10/1991	
247	GPS	Mano	Aminul Haq	Siaful Haq	Battagram	BA	25/11/1988	22/10/1991	04/01/1967	22/10/1991	
248	GPS	Lagh sar nasim	Muhammad Dilshad	Muhammad Sarwar	Battagram	FA	31/3/1988	22/10/1991	28/4/1968	22/10/1991	
249	GPS	Shaltay	Abdul Qayyum	Ambal Khan	Battagram	BA/CT	02/04/1988	22/10/1991	10/10/1968	22/10/1991	
250	GPS	Barmarin	Sabz Ali	Muhammad Haroon	Battagram	FA	10/11/1988	22/10/1991	02/12/1969	22/10/1991	
251	GPS	Hutal Batkul	Abdullah Jan	Azizur Rehman	Battagram	FA	09/10/1987	22/10/1991	08/08/1969	22/10/1991	
252	GPS	Bar Tandool	Jamroze Khen	Rajwali	Battagram	FA/CT	04/10/1988	22/10/1991	15/10/1969	22/10/1991	
253	GPS	Dari Muhammad Shah	Kifayatullah	Sharin Khan	Battagram	BA/B.Ed	02/06/1986	22/10/1991	30/10/1968	22/10/1991	
254	GPS	Rashang	Muhammad Rehman	Attaur Rehman	Battagram	BA/CT	22/3/1992	22/10/1991	15/1/1973	22/3/1992	
255	GPS	deri Kandoq	Muhammad Razaq Sheh	Said Mehmood	Battagram	MA/M.Ed	25/3/1992	01/01/1991	5/1/1969	25/3/1992	
256	GPS	Qorati	Muhammad Ismail	Umar Zarin	Battagram	BA	25/3/1992	22/10/1991	04/04/1969	25/3/1992	
257	GPS	Rabat	Muhammad Rehman	Zorakati Khan	Battagram	FA	25/3/1992	22/10/1991	06/05/1969	25/3/1992	
258	GPS	Mangano bela	Hayyullah	Ahmed Shirin	Battagram	BA	25/3/1992	22/10/1991	09/08/1970	25/3/1992	
259	GPS	Bella Dehat Khan	Muhammad Ilyas	Muhammad Ayyub	Battagram	BA	25/3/1992	22/10/1991	22/12/1970	25/3/1992	
260	GPS	Shaktar	Fazal Karim	Kachkol	Battagram	FA	25/3/1992	22/10/1991	04/03/1972	25/3/1992	
261	GPS	Rawa juret	Muhammad Rashid	Gulam Jaleel	Battagram	FA	25/3/1992	22/10/1991	01/01/1970	25/3/1992	
262	MOS	Sakengah	Fazal Malik	Kachkol	Battagram	BA	26/3/0992	22/10/1991	05/05/1970	26/3/1992	
263	GPS	Kabota	Ghulam Yousaf	Junia Khen	Battagram	BA	26/3/0992	22/10/1991	05/02/1970	26/3/1992	
264	GPS	Kuz Charan	Muhammad Rauf	Abdul Qayyum	Battagram	BA/CT	26/3/0992	22/10/1991	01/03/1971	26/3/1992	
265	GPS	Gandara	Nawab	Dawood Khan	Battagram	FA	26/3/0992	22/10/1991	05/06/1972	26/3/1992	

DBA NO. 677  
 BC No. 11-2131  
 Name of Advocate Hamamunlehan

S.No. 1425



Head Clerk  
 District Bar Association  
 Abotabad

وکالت نامہ

Reprse the K.P.K Service Tribunal بعدالت  
 Fayal Hadi بنام Govt عنوان:  
 Appeal نوعیت مقدمہ Respa No-455, 7, 8, 9 منجانب:  
 AR Butt باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی برائے پیشی یا تصفیہ مقدمہ بمقام \_\_\_\_\_ کے لیے  
Hamamunlehan Advocate  
 کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا اور بروقت پکارے  
 جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر منظر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ  
 سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے  
 علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ پکھری کے علاوہ کسی اور جگہ  
 سماعت ہونے پر یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر منظر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے  
 کسی معاوضہ کے ادا کرنے یا بخاند کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پرداخت صاحب موصوف  
 مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم  
 درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے  
 اور ہر قسم کے بیان دینے اور اس پر ثالثی و رضامندی نامہ و فیصلہ برحلف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے بیرونجات  
 از پکھری صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم انتہائی یا قرقی یا گرفتاری قبل از گرفتاری و اجراءے ڈگری بھی صاحب  
 موصوف کو بشرط ادا ایلی علیحدہ مختانہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکور یا اس کے  
 کسی جزوی کاروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں  
 وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ التوا پڑے گا وہ صاحب موصوف  
 کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ  
 کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

مورخہ: 20/9/14  
 دن ماہ سال

لہذا وکالت نامہ لکھ دیا ہے کہ سند ہے۔

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

Accepted  
 H. A. A.

Z. Muhammad  
 Khushkhal  
 M. A.

8  
 Reshadin Sher  
 or  
 Sultan Akbar

Tamab Sand  
 Z. Muhammad  
 M. A.

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

Service Appeal No. 684/2015

Fazal Hadi                      **VERSUS**                      Govt. of KPK & others.

**REPLY/ COMMENTS ON BEHALF OF**  
**RESPONDENTS NOS. 4 TO 9**

**INDEX**

S. No.	Description	Page Nos.	Annexure
1.	Comments	1 to 5	
2.	Copy of recommendation	6 - 15	"A"

....RESPONDENTS NOS. 4 TO 9

Dated: 17-11 /2015

Through;

  
(HAMAYUN KHAN)

Advocate High Court, Abbottabad

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

Service Appeal No. 684/2015

Fazal Hadi                      **VERSUS**                      Govt. of KPK & others.

**SERVICE APPEAL**

**REPLY/ COMMENTS ON BEHALF OF  
RESPONDENTS NOS. 4 TO 9**

Respectfully Sheweth: -

**PRELIMINARY OBJECTIONS:-**

1. That the appellant do not has any cause of action to file the instant appeal before this Honourable Tribunal.
2. That the appellant is estopped to bring present appeal by his own conduct.
3. That the appellant has not come to this Honourable Tribunal with clean hands.

- 2
4. That the present appeal is also not maintainable on the ground of non-joinder and mis-joinder of necessary party.
  5. That appellant was concealed the real facts from this Honourable Tribunal.
  6. That the departmental appeal of appellant was time barred.
  7. That appellant has no locus standi to bring the present appeal.
  8. That the present appeal of the appellant not maintainable due to concealment of material facts.

**FACTS:-**

1. Para No. 1 is correct to the extent of appointment but rest of para is subject to proof.
2. Para No. 2 is correct to the extent of 11 vacancies for promotion as per rule and rest of para is incorrect because list on which appellant relied

was provisional and not final list for promotion.

Hence para is incorrect.

3. That in reply to para No. 3 the present appellant junior in all respect from respondents Nos. 4 to 9 and promotion order was issued as per seniority list dated 31/12/2012 and in seniority list dated 31/12/2012 appellant placed at serial No. 235 and respondents placed as under;-

- 1) Nazir Muhammad serial No. 22.
- 2) Tawab Said serial No. 75.
- 3) Shad Muhammad Khan serial No. 129.
- 4) Muhammad Khursheed serial No. 131.
- 5) Bahadar Sher serial No. 163.
- 6) Ghulam Akbar serial No. 169.

And appellant not filed appeal against the seniority list dated 31/12/2012 and direct filed appeal against the notification dated 28/10/2014 issued by respondent No. 3, hence para is incorrect and appeal of the appellant is liable to be dismissed being not maintainable.

4. That in reply to para No. 4 departmental appeal filed by the appellant is hopefully time barred and

4

without explanation of any condonation, hence appeal of the appellant is not maintainable.

**GROUNDS:-**

A. Para No. "A" of the ground is incorrect, hence denied.

B. That in reply to para "B" of the appeal appellant was junior and his name placed at serial No. 235, therefore, respondents Nos. 1 to 3 dropped his name for promotion. Hence para is incorrect.

C. Para "C" is also incorrect, hence denied.

D. Para "D" is also incorrect, because respondents Nos. 1 to 3 after completion of all legal and codal formalities then issued promotion order dated 28/10/2014 and appellant not filed till date any appeal against seniority list dated 31/12/2012 issued by respondents, hence para "D" is incorrect.

5  
E. Para No. "E" needs no comments.

In the light of above going submissions appeal of  
appellant may kindly be dismissed.

....RESPONDENTS NOS. 4 TO 9

Dated: 17/11/2015

Through;

  
(HAMAYUN KHAN)  
Advocate High Court, Abbottabad

**VERIFICATION:-**

Verified that the contents of foregoing comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.

....RESPONDENTS NOS. 4 TO 9



Annexure A

(6)



**Directorate of Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar**

PH No. 091-9210389, 9210938,  
9210437, 9210957, 9210468  
Fax 091-9210936, 0800-33857  
E-mail rafiq\_kk851@yahoo.com

**MINUTES OF THE MEETING OF DEPARTMENTAL PROMOTION  
COMMITTEE HELD ON 18.08.2014 AT 10:30 AM IN OFFICE OF THE  
DIRECTOR (E&SE) KHYBER PAKHTUNKHWA PESHAWAR.**

A meeting of the Departmental Promotion Committee was held on 18.08.2014 at 10:00 AM under the Chairmanship of Director Elementary & Secondary Education Khyber Pakhtunkhwa to discuss the promotion cases of SCT/CT,SDM/DM,SAT/AT,SIT/TT,SQari/Qari,PSHT/SPST/PST, Male to the posts of SST (Bio-Chem),SST (Phy-Maths),SST (General) of the Elementary & Secondary Education Department. The following attended the meeting:

1. **Muhammad Rafiq Khattak** In Chair  
Director Elementary & Secondary  
Education Khyber Pakhtunkhwa
2. **Deputy Secretary**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa
3. **Muhammad Arif**  
Deputy Director Elementary &  
Secondary Education Khyber  
Pakhtunkhwa
4. **Muhammad Shoukat**  
District Education Officer  
Male Battagram

2. The meeting started with recitation from the Holy Quran. The Chair welcomed the participants. The following items were considered by the DPC and the decisions recorded are reflected against each item:

<b>DETAIL OF VACANT POSTS OF MALE</b>					
<b>Detail of distribution</b>		<b>SST SC Bio /Chem B-16</b>	<b>SST SC Maths /Phy B-16</b>	<b>SST Arts B- 16</b>	<b>Total</b>
<b>Total Vacancies</b>		27	26	48	<b>108</b>
<b>25% Initial Recruitment</b>		6	7	7	<b>20</b>
<b>75% By Promotion</b>		21	19	41	<b>81</b>
<b>75% By Promotion</b>	40% CT	11	10	22	<b>43</b>
	20% PST	5	5	11	<b>22</b>
	4% DM	1	1	2	<b>4</b>
	4% AT	1	1	2	<b>4</b>
	4% TT	1	1	2	<b>4</b>
	3% Qari	1	1	2	<b>3</b>
	<b>Total</b>	<b>21</b>	<b>19</b>	<b>41</b>	<b>81</b>

7

**A . SST (Bio-Chem)**

**ITEM NO.1 PROMOTION OF SCT/CT TO SST (BIO-Chem) BPS-16 ON REGULAR BASIS**

The case of promotion of SCT/CT to the post of SST (Bio-Chem) BPS-16 was considered and the DPC recommended as under:-

<b>Total No. of SST BIO-CHEM (M) Posts vacant Posts</b>	<b>27</b>
<b>25% share initial recruitment</b>	<b>6</b>
<b>75% share for Promotion.</b>	<b>21</b>
<b>40 % Share of promotion of SCT/CT</b>	<b>11</b>
<b>Posts available for promotion</b>	<b>11</b>
<b>Proposed for Promotion</b>	<b>00</b>
<b>Recommended for promotion</b>	<b>00</b>

S. No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular CT	Qualification		Remarks
						Acd	Prof	
<b>No Eligible Candidate is available</b>								

**ITEM NO.2 PROMOTION OF PSHT/SPST/PST TO SST (BIO-Chem) BPS-16 ON REGULAR BASIS**

The case of promotion of PSHT/SPST/PST to the post of SST (Bio-Chem) BPS-16 was considered and the DPC recommended as under:-

<b>Total No. of SST Bio-Chem (M) Posts vacant Posts</b>	<b>27</b>
<b>25% share initial recruitment</b>	<b>6</b>
<b>75% share for Promotion.</b>	<b>21</b>
<b>20 % Share of promotion of PSHT/SPST/PST</b>	<b>05</b>
<b>Posts available for promotion</b>	<b>05</b>
<b>Proposed for Promotion</b>	<b>05</b>
<b>Recommended for promotion</b>	<b>05</b>

S. No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular PST	Qualification		Remarks
						Acd	Prof	
<b>No Eligible Candidate is available</b>								

**ITEM NO.3 PROMOTION OF SDM/DM TO THE POST OF SST (Bio-Chem) BPS-16 ON REGULAR BASIS**

The case of promotion of SDM/DM to the post of SST (Bio-Chem) BPS-16 was considered and the DPC recommended as under:-

<b>Total No. of SST Bio-Chem (M) Posts vacant Posts</b>	<b>27</b>
<b>25% share initial recruitment</b>	<b>6</b>
<b>75% share for Promotion.</b>	<b>21</b>
<b>4 % Share of promotion of SDM/DM</b>	<b>01</b>
<b>Posts available for promotion</b>	<b>01</b>
<b>Proposed for Promotion</b>	<b>00</b>
<b>Recommended for promotion</b>	<b>00</b>

S. No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular SDM/DM	Qualification		Remarks
						Acd	Prof	
<b>No Eligible Candidate is available</b>								

**ITEM NO.4 PROMOTION OF SAT/AT TO THE POST OF SST (Bio-Chem) BPS-16 ON REGULAR BASIS**

The case of promotion of SAT/AT to the post of SST (Bio-Chem) BPS-16 was considered and the DPC recommended as under:-

<b>Total No. of SST Bio-Chem (M) Posts vacant Posts</b>	<b>55</b>
---	-----------

8

25% share initial recruitment	27
75% share for Promotion.	6
4 % Share of promotion of SAT/AT	21
Posts available for promotion	01
Proposed for Promotion	00
Recommended for promotion	00

S. No	S.L No	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular SAT/AT	Qualification		Remarks
						Acad	Prof	
No Eligible Candidate is available								

**ITEM NO.5 PROMOTION OF STT/TT TO THE POST OF SST (Bio-Chem) BPS-16 ON REGULAR BASIS**

The case of promotion of STT/TT to the post of SST (Bio-Chem) BPS-16 was considered and the DPC recommended as under:-

Total No. of SST Bio-Chem (M) Posts vacant Posts	27
25% share initial recruitment	6
75% share for Promotion.	21
4 % Share of promotion of STT/TT	01
Posts available for promotion	01
Proposed for Promotion	00
Recommended for promotion	00

S. No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular TT	Qualification		Remarks
						Acad	Prof	
No Eligible Candidate is available								

**ITEM NO.6 PROMOTION OF S Qari/Qari TO THE POST OF SST (Bio-Chem) BPS-16 ON REGULAR BASIS**

The case of promotion of S Qari/Qari to the post of SST (Bio-Chem) BPS-16 was considered and the DPC recommended as under:-

Total No. of SST BIO-CBio-Chem (M) Posts vacant Posts	27
25% share initial recruitment	6
75% share for Promotion.	21
3 % Share of promotion of S Qari/Qari	01
Posts available for promotion	01
Proposed for Promotion	00
Recommended for promotion	00

SNo	S.LN o	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular Qari	Qualification		Remarks
						Acad	Prof	
No Eligible Candidate is available								

**B . SST (Phy-Maths)**

**ITEM NO.7 PROMOTION OF SCT/CT TO SST (Phy-Maths) BPS-16 ON REGULAR BASIS**

The case of promotion of SCT/CT to the post of SST (Phy-Maths) BPS-16 was considered and the DPC recommended as under:-

Total No. of SST Phy-Maths (M) Posts vacant Posts	26
25% share initial recruitment	7
75% share for Promotion.	19
40 % Share of promotion of SCT/CT	10
Posts available for promotion	10

Proposed for Promotion	04
Recommended for promotion	03

S. No	S.L. No	Name of Official	Father Name	Date of Birth	Date of appointment as regular CT	Qualification		Remarks
						Acd	Prof	
1	47	Mian Gul	GHS Jambura	2/16/1968	1/24/1991	B.Sc	B.Ed	Considered suitable for promotion to the post of SST Phy-Maths (BPS-16) on regular basis with immediate effect.
2	57	Fida Hussain	GMS Merani	1/5/1968	1/9/1993	B.Sc	B.Ed	Considered suitable for promotion to the post of SST Phy-Maths (BPS-16) on regular basis with immediate effect.
3	59	Muhammad Bashir	GCMHS Battagram	4/4/1969	3/4/1993	B.Sc	M.Ed	Considered suitable for promotion to the post of SST Phy-Maths (BPS-16) on regular basis with immediate effect.

Number of Male SCT/CT cleared for promotion = 03

**ITEM NO.8 PROMOTION OF PSHT/SPST/PST TO SST (Phy-Maths BPS-16 ON REGULAR BASIS)**

The case of promotion of PSHT/SPST/PST to the post of SST (Phy-Maths) BPS-16 was considered and the DPC recommended as under:-

Total No. of SST Phy-Maths (M) Posts vacant Posts	26
25% share initial recruitment	7
75% share for Promotion.	19
20 % Share of promotion of PSHT/SPST/PST	05
Posts available for promotion	05
Proposed for Promotion	01
Recommended for promotion	01

S. No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular PST	Qualification		Remarks
						Acd	Prof	
1	413	Atta Ullah	GPS Bishkot	4/15/1971	1/8/1991	B.Sc	B.Ed	Considered suitable for promotion to the post of SST Phy-Maths (BPS-16) on regular basis with immediate effect.

Number of Male PSHT/SPST/PST cleared for promotion = 01

**ITEM NO.9 PROMOTION OF SDM/DM TO THE POST OF SST (Phy-Maths BPS-16 ON REGULAR BASIS)**

The case of promotion of SDM/DM to the post of SST (Phy-Maths) BPS-16 was considered and the DPC recommended as under:-

Total No. of SST Phy-Maths (M) Posts vacant Posts	26
25% share initial recruitment	7
75% share for Promotion.	19
4 % Share of promotion of SDM/DM	01
Posts available for promotion	01
Proposed for Promotion	00
Recommended for promotion	00

S. No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular DM	Qualification		Remarks
						Acd	Prof	
No eligible Candidate is available								

**ITEM NO.10 PROMOTION OF SAT/AT TO THE POST OF SST (Phy-Maths BPS-16 ON REGULAR BASIS)**

The case of promotion of SAT/AT to the post of SST (Phy-Maths) BPS-16 was considered and the DPC recommended as under:-

Total No. of SST Phy-Maths (M) Posts vacant Posts	26
25% share initial recruitment	7
75% share for Promotion.	19
4 % Share of promotion of SAT/AT	01

Posts available for promotion	01
Proposed for Promotion	00
Recommended for promotion	00

S. No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular AT	Qualification		Remarks
						Acad	Prof	
No eligible Candidate is available								

**ITEM NO.11 PROMOTION OF STT/TT TO THE POST OF SST (Phy-Maths) BPS-16 ON REGULAR BASIS**

The case of promotion of STT/TT to the post of SST (Phy-Maths) BPS-16 was considered and the DPC recommended as under:-

Total No. of SST Phy-Maths (M) Posts vacant Posts	26
25% share initial recruitment	7
75% share for Promotion.	19
4 % Share of promotion of STT/TT	01
Posts available for promotion	01
Proposed for Promotion	00
Recommended for promotion	00

S. No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular DM	Qualification		Remarks
						Acad	Prof	
No eligible Candidate is available								

**ITEM NO.12 PROMOTION OF S Qari/Qari TO THE POST OF SST (Phy-Maths) BPS-16 ON REGULAR BASIS**

The case of promotion of S Qari/Qari to the post of SST (Phy-Maths) BPS-16 was considered and the DPC recommended as under:-

Total No. of SST Phy-Maths (M) Posts vacant Posts	26
25% share initial recruitment	7
75% share for Promotion.	19
3 % Share of promotion of S Qari/Qari	01
Posts available for promotion	01
Proposed for Promotion	00
Recommended for promotion	00

S.L. No	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular Qari	Qualification		Remarks
					Acad	Prof	
No eligible Candidate is available							

**C. SST (General)**

**ITEM NO.13 PROMOTION OF SCT/CT TO SST (General) BPS-16 ON REGULAR BASIS**

The case of promotion of SCT/CT to the post of SST (General) BPS-16 was considered and the DPC recommended as under:-

Total No. of SST General (M) Posts vacant Posts	48
25% share initial recruitment	7
75% share for Promotion.	41
40 % Share of promotion of SCT/CT	22
Posts available for promotion	22
Proposed for Promotion	22
Recommended for promotion	22

SL No	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular CT	Qualification		Remarks
					Acad	Prof	

1	1	Syed Fazal Mujeeb Shah	GHS Bilandkot	6/12/1955	7/14/1986	MA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
2	3	Syed Gul Ali Shah	GHS Bilandkot	2/12/1958	7/14/1986	MA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
3	4	Saifur Rehman	GHS Tailoos	1/20/1960	7/14/1986	MA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
4	5	Muhammad Israil	GHS Chappargram	2/27/1962	7/14/1986	MA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
5	10	Akbar Shah	GHS Bilandkot	11/25/1956	5/26/1987	MA	B.Ed	Considered not suitable for promotion to the post of SST General (BPS-16) as he has 3 <sup>rd</sup> division in BA.
6	14	Sultan Sikandar	GHS Tailoos	1/1/1961	5/26/1987	MA	B.Ed	Considered not suitable for promotion to the post of SST General (BPS-16) as he has 3 <sup>rd</sup> division in BA.
7	19	Amir Muhammad	GHSS Kuza Banda	6/15/1963	5/26/1987	MA	B.Ed	Considered not suitable for promotion to the post of SST General (BPS-16) as he has 3 <sup>rd</sup> division in BA.
8	20	Ahmad Nabi	GHS Sakargah	11/8/1963	5/26/1987	MA	B.Ed	Considered not suitable for promotion to the post of SST General (BPS-16) as he has 3 <sup>rd</sup> division in BA.
9	24	Abdul Wahab	GHSS Kuza Banda	2/1/1965	10/1/1987	BA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
10	25	Hafiz-ur-Rahman	GHS Shingli Payeen	4/3/1962	10/6/1987	BA	B.Ed	Considered not suitable for promotion to the post of SST General (BPS-16) as he has 3 <sup>rd</sup> division in BA.
11	27	Amir Muhammad	GHSS Kuza Banda	5/10/1965	10/8/1987	BA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
12	31	Banaras Khan	GCMHS Battagram	2/11/1964	8/1/1988	BA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
13	32	Masoom Khan	GCMHS Battagram	5/2/1965	11/26/1988	MA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
14	33	Abdul Wahab	GHS Gijbori	4/1/1961	1/31/1989	BA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
15	35	Muhammad Rasool	GHS Tailoos	10/15/1965	8/26/1989	MA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
16	36	Jan Muhammad	GHSS Kuza Banda	1/1/1968	9/1/1989	MA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
17	43	Muhammad Fayyaz	GMS Miran	3/25/1970	12/14/1990	MA	M.Ed	Considered suitable for promotion to the post of

Battagram SST (Male) 18.08.2014 7/12

								SST General (BPS-16) on regular basis with immediate effect.
18	45	Noor Muhammad	G.Jica Modle School Pora Bala	1/1/1969	12/15/1990	BA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
19	46	Muhammad Naeem	GHS Peshora	7/4/1967	1/23/1991	BA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
20	49	Haider Zaman	GHS Paimal Sharif	2/5/1964	3/15/1991	MA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
21	51	Hazrat Yousaf	GHS Joze	1/20/1960	10/22/1991	BA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
22	54	Abdus Salam	GHS Hill	3/22/1965	5/24/1992	MA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
23	55	Hazrat Yousaf	GIIS Joze	6/4/1965	10/15/1992	BA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
24	58	Abdul Quddoos	GCMHS Battagram	5/28/1967	3/4/1993	MA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
25	60	Bashir Ahmad	GHS Shingli Payeen	1/5/1971	3/4/1993	MA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
26	61	Muhammad Nasim	GHS Thakot	11/11/1968	7/12/1993	MA	M.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
27	62	Hidaytul Haq	GMS Trand	1/1/1965	12/25/1993	MA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.

Number of Male SCT/CT cleared for promotion = 22

**ITEM NO.14 PROMOTION OF PSHT/SPST/PST TO SST (General) BPS-16 ON REGULAR BASIS**

The case of promotion of PSHT/SPST/PST to the post of SST (General) BPS-16 was considered and the DPC recommended as under:-

<b>Total No. of SST General (M) Posts vacant</b>	<b>48</b>
<b>25% share initial recruitment</b>	<b>7</b>
<b>75% share for Promotion.</b>	<b>41</b>
<b>20 % Share of promotion of PSHT/SPST/PST</b>	<b>11</b>
<b>Posts available for promotion</b>	<b>11</b>
<b>Proposed for Promotion</b>	<b>11</b>
<b>Recommended for promotion</b>	<b>11</b>

S.L. No	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular PSHT/SPST/PST	Qualification		Remarks
					Acad	Prof	
11	Arsala Khan	GPS Nathu	9/8/1959	13/11/1981	MA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
20	Abdul Nazeer	GPS D/Jangir	11/3/1966	7/10/1984	MA	B.Ed	Considered suitable for promotion to the post of SST

								General (BPS-16) on regular basis with immediate effect
3	22	Nazeer Muhammad	GPS Bakro Dab	10/6/1966	1/8/1985	BA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
4	23	Nisar Muhammad	GPS Gid/Muh/Khan	4/10/1967	1/8/1985	BA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
5	75	Tawab Said	GPS Saidara	5/3/1961	12/25/1981	MA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
6	129	Shad Muhammad Khan	Khan GPS Thaya	2/19/1966	5/29/1988	BA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
7	131	Muhammad Khurshid	GPS Koronaw	5/1/1968	10/9/1987	BA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
8	163	Bahader Sher	Deshwal	10/15/1966	1/10/1988	BA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
9	169	Ghulam Akbar	GPS Batamori	11/4/1969	2/10/1988	BA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
10	172	Muhammad Javid	GPS Tamai	10/1/1969	3/10/1988	BA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
11	173	Muhammad Javid	GPS Mana Gangwal	1/4/1969	3/10/1988	BA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.

Number of Male PSHT/SPST/PST cleared for promotion = 11

**ITEM NO.15 PROMOTION OF SDM/DM TO SST (General) BPS-16 ON REGULAR BASIS**

The case of promotion of SDM/DM to the post of SST (General) BPS-16 was considered and the DPC recommended as under:-

Total No. of SST General (M) Posts vacant Posts	48
25% share initial recruitment	7
75% share for Promotion.	41
4 % Share of promotion of SDM/DM	02
Posts available for promotion	02
Proposed for Promotion	02
Recommended for promotion	02

S No	SL No	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular SDM/DM	Qualification		Remarks
						Acd	Prof	
1	22	Muhammad Afzal	GMS Pazang	5/15/1963	12/26/1993	BA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
2	28	Inam ul haq	GMS Miran	5/5/1972	2/27/1998	BA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.

Number of Male SDM/DM cleared for promotion = 02

**ITEM NO.16 PROMOTION OF SAT/AT TO SST (General) BPS-16 ON REGULAR BASIS**

The case of promotion of SAT/AT to the post of SST (General) BPS-16 was considered and the DPC recommended as under:-

Total No. of SST General (M) Posts vacant Posts	48
25% share initial recruitment	7
75% share for Promotion.	41
4 % Share of promotion of SAT/AT	02



Posts available for promotion	02
Proposed for Promotion	02
Recommended for promotion	02

S. No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular SAT/AT	Qualification		Remarks
						Acd	Prof	
1	8	Abdul Hakeem	GHS Shingli Payeen	5/4/1965	8/12/1985	MA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
2	31	Badrul Alam	GHS Tailoos Allai	4/14/1965	10/18/1988	MA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.

Number of Male SAT/AT cleared for promotion = 02

**ITEM NO.17 PROMOTION OF STI/TT TO SST (General) BPS-16 ON REGULAR BASIS**

The case of promotion of STI/TT to the post of SST (General) BPS-16 was considered and the DPC recommended as under:-

Total No. of SST General (M) Posts vacant Posts	48
25% share initial recruitment	7
75% share for Promotion.	41
4 % Share of promotion of STI/TT	02
Posts available for promotion	02
Proposed for Promotion	02
Recommended for promotion	02

S. No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular STI/TT	Qualification		Remarks
						Acd	Prof	
1	28	Anwar Zaib	GCMHS Battagram	1/5/1975	4/7/1999	MA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
2	32	Muhammad Rafiq	GHS Peshora Battagram	3/4/1972	5/26/2005	BA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.

Number of Male STI/TT cleared for promotion = 02

**ITEM NO.18 PROMOTION OF S Qari/Qari TO SST (General) BPS-16 ON REGULAR BASIS**

The case of promotion of S Qari/Qari to the post of SST (General) BPS-16 was considered and the DPC recommended as under:-

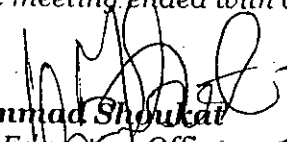
Total No. of SST General (M) Posts vacant Posts	48
25% share initial recruitment	7
75% share for Promotion.	41
3 % Share of promotion of S Qari/Qari	02
Posts available for promotion	02
Proposed for Promotion	02
Recommended for promotion	02


S. No	S. L. No	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular Qari	Qualification		Remarks
						Acd	Prof	
1	22	Ikramullah	GHS Chappargram	5/4/1972	3/1/2000	MA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.

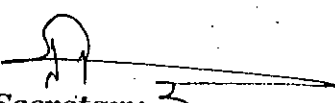
2	23	Rangaiz Khan	GHS Banna Allai	12/12/1975	3/1/2000	BA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
---	----	--------------	-----------------	------------	----------	----	------	---

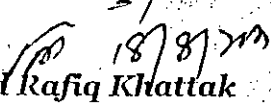
Number of Male S Qari/Qari cleared for promotion = 02

3. The meeting ended with a vote of thanks to and from the chair.

  
**Muhammad Shoukat**  
 District Education Officer  
 (Male) Battagram

  
**Muhammad Arif**  
 Deputy Director  
 Elementary & Secondary Education  
 Khyber Pakhtunkhwa

  
**Deputy Secretary**  
 Elementary & Secondary  
 Education Khyber Pakhtunkhwa

  
**Muhammad Rafiq Khattak**  
 Director  
 Elementary & Secondary Education  
 Khyber Pakhtunkhwa

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 684 /2015

Fazal Hadi.....Appellant

Versus

The Govt. and others.....Respondents

**REJOINDER ON BEHALF OF APPELLANT IN RESPONSE  
TO REPLY FILED BY RESPONDENTS NO.1-3.**

Respectfully Sheweth,

**Preliminary Objections:**

Preliminary objections raised by answering respondents are erroneous and frivolous. The appellant has got cause of action/locus standi to prefer the instant appeal. The claim of the appellant is bonafide and nothing has been concealed. The appeal of the appellant is within time.

**Facts:**

1. Being admitted needs no reply.
2. Misconceived. The Committee so constituted was for the purpose of determining the eligible candidates for promotion and the Committee constituted the list (Annexure-A page-5 of the appeal) wherein the name of the appellant is at serial No.9. It is an afterthought defence to outweigh the claim of the appellant.

3. Reply to Para-3 of the appeal is misleading/misguiding. There is no cavil with the fact that the Director is the competent authority but it cannot be denied that it is the District Office which prepares, processes the entire proceedings and transmit the same to the Director for approval and Notification. In other words, the names of eligible candidates for promotion are determined by the District Office. The answering Respondents have eluded the detailed reply in order to camouflage the actual controversy between the parties. At the time of the first list prepared on 04.01.2014 it was the appellant who was amongst the senior-most eligible for promotion and as such entitled but due to the underhand dealings, the name of the appellant was dropped and interested candidates were inserted.
4. Being not replied hence admitted.

**Grounds:**

- A. Reply to Ground-A of the appeal is incorrect hence denied. The impugned Notification is against the law and therefore not maintainable.
- B. Reply to Ground-B of the appeal is incorrect hence denied. In view of the seniority, eligibility, the appellant was selected for promotion by the Committee.
- C. Reply to Ground-C of the appeal is incorrect and misleading. The Committee for all intents and purposes was assigned the task of pinpointing the candidates due for promotion on account of seniority, eligibility etc. It is a false and afterthought defence the mandate of the Committee was different.
- D. Reply to Ground-D of the appeal is incorrect hence denied.

E. Needs no clarification.

It is, therefore, humbly prayed that the reply of answering Respondents No.1-3 may graciously be rejected and the appeal as prayed for may graciously be accepted with costs.

Through

Appellant

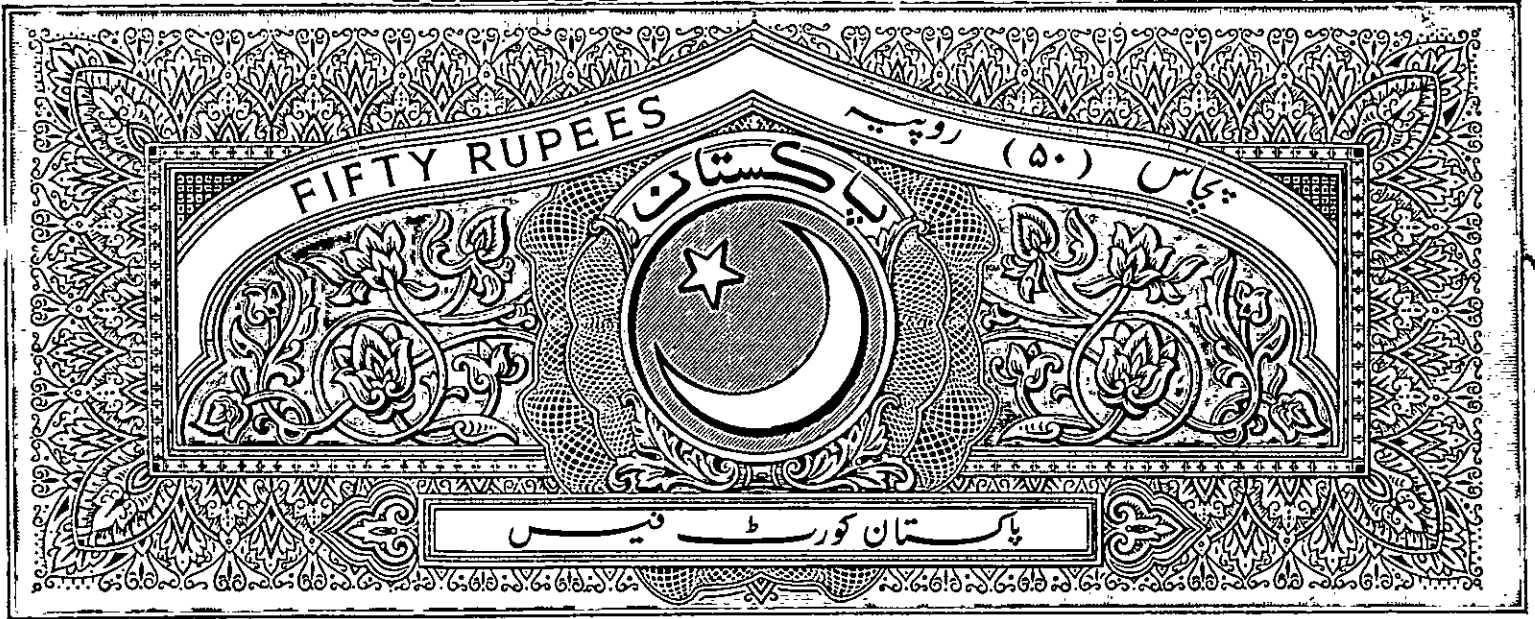
Khaled Rajwan  
Advocate, Peshawar

Dated: 16/10/2016

**Verification**

Verified as per instructions of my client, that the contents of this rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Counsel



لجسٹریٹڈ جج صاحبان کی عدالت عالیہ لاہور



سید امجد علی  
۶۸۴/۱۵  
فصل عدوی بنام گورنمنٹ و غیرہ  
سروس ایڈل  
۱۹۷۸

پہلے جج صاحبان کی عدالت عالیہ لاہور

۱۔ جج صاحبان کی عدالت عالیہ لاہور میں ۴/۱۳/۵۱  
کو پاس کیا گیا ہے۔

۲۔ جج صاحبان کی عدالت عالیہ لاہور میں ۵/۱۳/۵۱  
کو پاس کیا گیا ہے۔

۳۔ جج صاحبان کی عدالت عالیہ لاہور میں ۷/۱۳/۵۱  
کو پاس کیا گیا ہے۔

۴۔ جج صاحبان کی عدالت عالیہ لاہور میں ۸/۱۳/۵۱  
کو پاس کیا گیا ہے۔

۵۔ جج صاحبان کی عدالت عالیہ لاہور میں ۹/۱۳/۵۱  
کو پاس کیا گیا ہے۔  
DEP میں سبکدوشی کے بارے میں  
Promotion کے بارے میں سبکدوشی کے بارے میں

خانم محمد مرصه ولد محمد احمد  
محمد حفصه ولد محمد احمد

50  
2

7463.

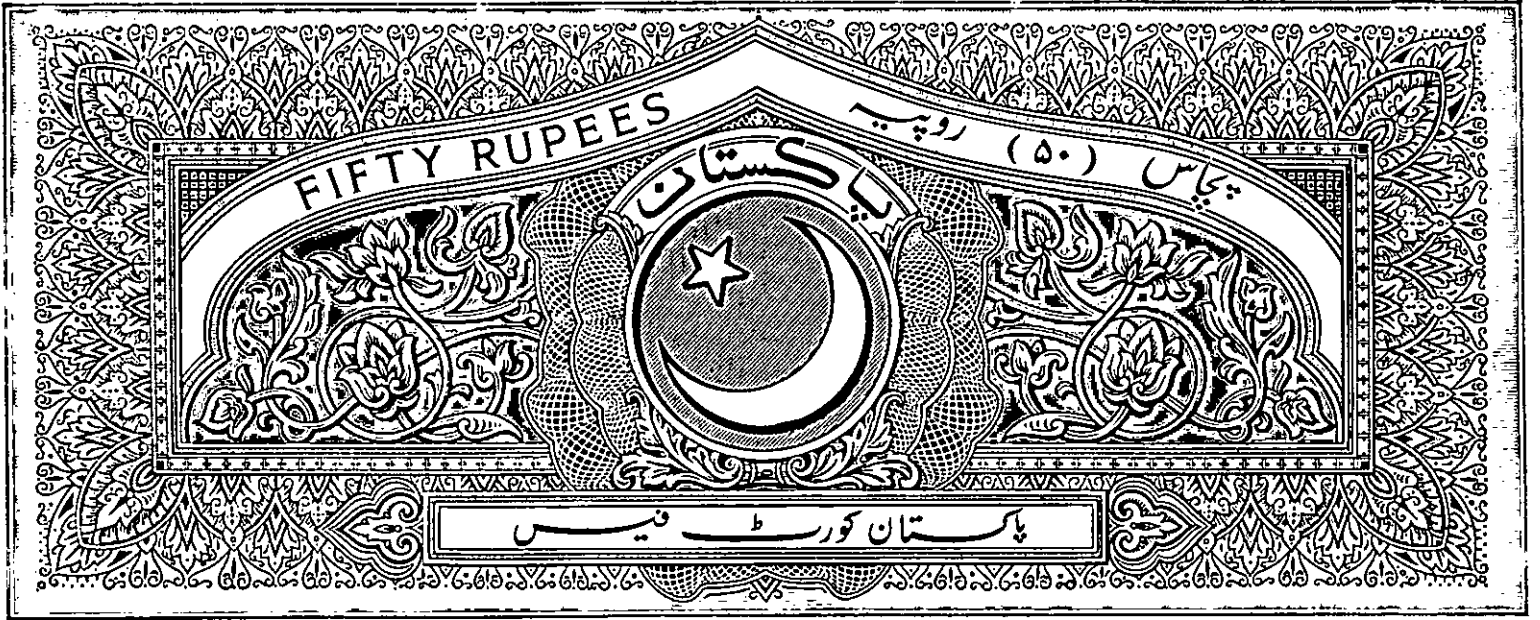
13202-0721170-7

18/2  
2018

*[Signature]*

Muhammad Rafique  
STAMP VENDER  
Kutchery Abbottabad

*[Signature]*



میں نے اور آئندہ عملی جمع کرنے کے بائندہ ہیں گے۔  
 اگر مذکورہ بالا بیان صلی میں کسی قسم کی تملط بیانی  
 ثابت ہو جائے تو سب اس کا نتائج کے خود ذمہ دار  
 ہوں گے۔ بیان صلی لفظاً باللفظ صحیح دست ہے۔ اور کوئی اعتراض  
 نہ رکھا ہے۔

المرفوع ۱۹۱۵۲  
 ۱۵

۱۔ نواب سید العبد  
 13202-6415993-9

۱۔ العبد تغیراتی  
 1320207211707

۲۔ العبد بیاد سید  
 13201-6884837-5

۳۔ العبد سید  
 13202-0737211-9

