

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

**Appeal No. 308/2022**

Raja Sher Khan.....Appellant

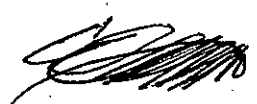
VERSUS

Govt: of Khyber Pakhtunkhwa & Others.....Respondents

**JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS NOS. 1 TO 4**

**INDEX**

<b>Sr.No</b>	<b>Description</b>	<b>Page Nos</b>	<b>Annexures</b>
1	Comments alongwith affidavit.	01 - 05	
2	Copy of Application dated 13-06-2022	06	"A"
3	Copy of Notification of appointment of Inquiry Officer dated 13-06-2022	07	"B"
4	Copy of Inquiry Report	8 - 10	"C"
5	Copy of letter dated 16-09-2022	11	"D"
6	Copy of revised / restored seniority list	12 - 13	"E"
7	Copy of letter dated 19-09-2022	14	"F"

  
**District Education Officer (M)**  
**Kohistan Upper.**  
**(Respondent No. 2)**

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

**Appeal No. 308/2022**

Raja Sher Khan.....Appellant

VERSUS

Govt: of Khyber Pakhtunkhwa & Others.....Respondents

**JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS NOS. 1 TO 4**

**RESPECTFULLY SHEWETH:-**

Comments on behalf of Respondents Nos. 1 to 4 are submitted as under:-

**Preliminary objection:-**

1. That the appellant has no cause of action to file the instant appeal against the answering respondents.
2. That the appeal of the appellant is time barred. Hence liable to be dismissed without any further proceeding.
3. That the seniority list has been restored by the respondent No. 4 and the name of the appellant is placed at Serial No. 6 of the said list hence, instant service appeal has become infructuous.
4. That the appellant did not file departmental appeal against promotion order dated 25-01-2022 hence, he cannot challenge the promotion order in the instant service appeal.
5. That the instant appeal is not maintainable in its present form.
6. That the appellant has filed the present appeal just to pressurize the respondents.
7. That the appellant has not come to this Honorable Tribunal with clean hands.
8. That the appellant is estopped to sue due to his own conduct.
9. That the instant appeal is not maintainable due to non-joinder and mis-joinder of necessary parties.
10. That the instant appeal is against the Service Laws.

**Factual Objections:-**

1. That the Para No. 1, of the service appeal relates to the service record of the appellant hence, need no further comment.
2. That the Para No. 2, of the service appeal also relates to the service record of the appellant.
3. That the Para No. 3, of the service appeal relates to the service record of the appellant hence, need no further comment.
4. That the Para No. 4, of the service appeal relates to record.
5. That the Para No. 5, of the service appeal pertains to record hence, need no further comment.
6. That the Para No. 6, of the service appeal as composed is incorrect. Hence, denied and not admitted
7. That the Para No. 7, of the service appeal is correct.
8. That the Para No. 8, of the service appeal relates to record.
9. In reply to Para No. 9, of the service appeal it is submitted that appellant was appointed as CT on 29-05-2004 whereas, he filed an appeal regarding correction in seniority on 20-09-2021 after the lapse of 17 years.
10. That the Para No. 10, of the service appeal as composed is incorrect hence, denied and not admitted.
11. In reply to Para No. 11, of the service appeal, it is submitted that appellant did not file departmental appeal against promotion order dated 25-01-2022 hence, he cannot challenge the promotion order in the instant service appeal.
12. In reply to Para No. 12 of the service appeal, it is submitted that appellant did not file departmental appeal against promotion order dated 25-01-2022 hence, he cannot challenge the promotion order in the instant service appeal. Further submitted that appellant submitted joint application on 13-06-2022 to respondent No. 01 stating therein that they were ignored in SST Promotion in January, 2022 while their junior teachers were promoted. Consequently, respondent No. 1 appointed an inquiry officer Mr. Lal Saeed Deputy Secretary (Board & Training) vide Notification No. SO(PE)E&SED/5-1/Inquiry/2022 dated 13-06-2022 to conduct inquiry into application of the appellant. Inquiry Officer submitted its report. In the light of the inquiry report received through letter No. SO(PE)/E&SED/5-1/Misc-Gen/IR/M.A/2022 dated 16-09-2022, the seniority list was restored by the respondent No. 4 and the name of the appellant is placed at

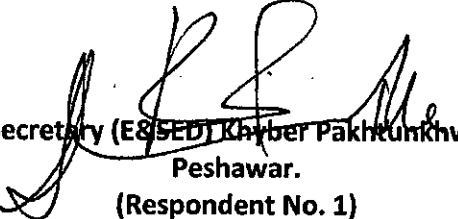
Serial No. 6 of the said list hence, instant service appeal has become infructuous. Moreover, respondent No. 04 forwarded updated seniority list alongwith working papers to respondent No. 02 regarding promotion of appellant against the post of SST (BPS-16) vide letter No. 2562 dated 19-09-2022. *(Copies of the Application dated 13-06-2022, Notification of appointment of Inquiry Officer dated 13-06-2022, Inquiry Report, letter dated 16-09-2022, Revised / Restored Seniority List and letter No. 2562 dated 19-09-2022 are annexed herewith as Annexure "A", "B", "C", "D", "E" & "F" respectively)*

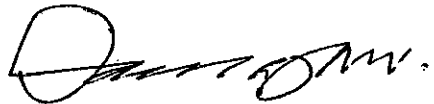
**Grounds:**

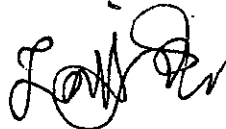
- a. That ground a, as composed is incorrect hence, denied and not admitted. Detailed and comprehensive reply has already been given in Para No. 12 of the Factual Objections.
- b. In reply to ground b, it is submitted that the seniority list has been restored by the respondent No. 4 and the name of the appellant is placed at Serial No. 6 of the said list hence, instant service appeal has become infructuous.
- c. That ground c, as composed is incorrect hence, denied. Detailed and comprehensive reply has already been given in Para No. 12 of the Factual Objections.
- d. That ground d, as composed is incorrect. The respondents have not violated Article 25 of the constitution and the appellant has been dealt in accordance with law.
- e. That ground e, as composed is incorrect. The act of the respondents are as per law and rule.
- f. That ground f, as composed is incorrect. The answering respondents treated the appellant as per rule and law.
- g. That ground g, relates to record.
- h. Reply of Para h of the ground is that the notification dated 25-01-2022 was issued in accordance with law and rule.
- i. That ground i, is subject to cogent proof.
- j. In reply to ground j, it is submitted that the seniority list has been restored by the respondent No. 4 and the name of the appellant is placed at Serial No. 6 of the said list hence, instant service appeal has become infructuous.


- k. Detailed and comprehensive reply has already been given in Para No. 12 of the Factual Objections.
- l. Detailed and comprehensive reply has already been given in Para No. 12 of the Factual Objections.
- m. That other grounds will be agitated during arguments.
- n. That the respondents seek leave of this Honorable Court to raise additional grounds at the time of arguments.

Under the circumstances, it is humbly prayed that the instant service appeal has become infructuous, hence liable to be dismissed with cost.

  
Secretary (E&SE) Khyber Pakhtunkhwa  
Peshawar.  
(Respondent No. 1)

  
Director (E&SE) Khyber Pakhtunkhwa  
Peshawar.  
(Respondent No. 2)

  
Assistant Director (E&SE) Khyber  
Pakhtunkhwa  
Peshawar.  
(Respondent No. 3)

  
District Education Officer (M)  
Kohistan Upper  
(Respondent No. 4)

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

**Appeal No. 308/2022**

Raja Sher Khan.....Appellant

VERSUS

Govt: of Khyber Pakhtunkhwa & Others.....Respondents

**JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS NOS.1 TO 4**

**AFFIDAVIT**

I, Mr. Abdur Rehman, District Education Officer (M) Kohistan Upper, do hereby affirm and declare that contents of forgoing comments are correct and true according to the best of my knowledge and belief and nothing has been suppressed from this Honorable Tribunal.



**DEPONENT**





GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar

Annexure B

7

Dated Peshawar the June 13, 2022

NOTIFICATION

No. SO(PE)E&SED/5-1/Inquiry/2022: The Competent Authority has been pleased to appoint Mr. Lal Saeed Khattak, Deputy Secretary (Boards & Training), E&SE Department as Inquiry Officer to conduct an inquiry into the application of Mr. Mushtaq Ahmad & others of Upper Kohistan.

2. A copy of the application is enclosed with the request to conduct the requisite inquiry and submit report to this office within week time.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Copy forwarded to the:

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. Mr. Lal Saeed Khattak, Deputy Secretary (Boards & Training), E&SE Department.
3. PS to Secretary, E&SE Department Khyber Pakhtunkhwa.

SECTION OFFICER (PE)

13/6/22

22.07.2015 showing their seniority as 68 & 70 respectively.

6. In the final seniority list as stood on 01.06.2019, Mr. Mushtaq Ahmad was shown at S.No

11. While Ajam Khan S.No 14 & Noor Ali S.No 22.



INQUIRY REPORT

Competent Authority in E&SE Department vide Notification No. SO (PE)E&SED/5-1/Inquiry/2022 dated 13.06.2022 appointed Deputy Secretary (Boards & Training) to conduct Inquiry into the application of Mr. Muhtaq Ahmad & other of Distt Upper Kohistan (Annex-I).

Charges / Allegations made by the Complainants.

Mr. Mushtaq Ahmad SCT, Mr. Raja Sher Khan SCT & Mursaleen Khan PSHT of District Kohistan upper submitted joint application to worthy Secretary E&SE, stating therein that they were ignored in SST promotion in January, 2022. While their junior teachers namely Ajam Khan SCT, Mr. Noor Ali SCT and Muhammad Yousaf PSHT were promoted as SST.

PROCEDURE OF THE INQUIRY

Letter was issued to DEO (M) Kohistan Upper on 16.06.2022 with direction to keep all the record handy and make sure the availability of aggrieved teachers on 21.06.2022 (Annex-II). They were again called on 21.07.2022. In repose, Mr. Sher Mohammad DDEO (M) Upper Kohistan and one of the aggrieved teacher namely Mr. Mushtaq Ahmad SCT joined the inquiry proceedings. The complainant relied on his statement earlier delivered to inquiry officer on 14.06.2022 (Annex-III). While the DDEO (M) Kohistan upper provided copies of certain documents viz seniority lists / DPC recommendations / notification appeal of the applicant for promotion, comments / report of DEO / Director E&SE & copy of Judgment of KP Service Tribunal dated 17.09.2020 passed in the service appeal filed by Mr. Noor Ali S/O Muzzamil Khan (Annex-IV). The other two teachers viz Raja Sher Khan SCT & Mursaleen PSHT were informed by the DEO Office but they declined to join the inquiry proceedings. The undersigned also contacted them on phone but they did not appear.

FACTS OF THE CASE / FINDINGS:

1. Mr. Ajam Khan S/O Ahmadlee PTC and Mr. Mr. Mushtaq Ahmad S/O Alif Said DM were appointed as CT on 29.05.2004 having score of 48.20 & 51.80 respectively.
2. Through court order on 23.06.2016, Mr. Mushtaq Ahmad changed his name from "Seer-ul-whaj" and was notified by DEO (M) Kohistan on 04.07.2018.
3. Mr. Mushtaq Ahmad is older in age than Mr. Ajam Khan.
4. As per merit and age, Mr Mushtaq Ahmad ranked senior to Mr. Ajam Khan in the seniority list.
5. Both the teachers viz Mushtaq Ahmad & Ajam Khan were promoted as SCT on 22.07.2015 showing their seniority as 68 & 70 respectively.
6. In the final seniority list as stood on 01.06.2019, Mr. Mushtaq Ahmad was shown at S.No 11. While Ajam Khan S.No 14 & Noor Ali S.No 22.

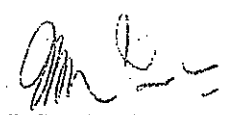
7. While in the final seniority list issued by DEO (M) Kohistan upper on 01.08.2021, Mr. Noor Ai & Ajam Khan were placed senior i.e Sr.No. 5 & 7 to Mr. Mushtaq Ahmad (Sr.No 09) in violation of rules. Though Ajam Khan had submitted application to DEO concerned in this regard on 13.08.2021.
8. Mr. Noor Ali and Ajam Khan being Junior to Mushtaq Ahmad were promoted as SST on 25.01.2022.
9. Mr. Noor Ali was promoted as SCT on 12.02.2021 and as per promotion policy, he was kept on probation for a period of one year extendable for another year. Therefore his promotion as SST 25.01.2022 during probation period is not covered under the law & relevant rules.
10. Due to his willful absence w.e.f 01.05.2007/<sup>and</sup> disciplinary proceedings, Mr. Noor Ali was removed from service. He was reinstated on 01.07.2018 in light of decision of the Service Tribunal. The intervening period w.e.f 01.05.2007 to 30.06.2018 was ordered as extra ordinary leave without pay. He appealed to Director E&SE / DEO for grant of seniority qualifying service & restoration of annual increments / back benefits but was not acceded to. He then challenged the order of DEO in the Service Tribunal, which was dismissed vide order dated 17.09.2020.
11. Despite above court order, Mr. Noor Ali was promoted as SCT and subsequently as SST in sheer violation of rules.
12. Seniority has not been correctly determined by the DEO, as required and specified in Rule-17 of Appointment, Promotion & Transfer Rules, 1989.
13. It was informed that Mr. Noor Mehmood SST has been posted by the DEO against the post of ADEO (Estab) who is working there from last more than ten years. He has also been assigned the charge of SDEO Hurban Shah by the then DEO. Similarly, some other SSTs have been posted as ADOs / ADEOs and also given additional charge of SDEOs by the DEO, which is otherwise competency of Director Elementary & Secondary Education / Administrative Department. Such orders issued by the then DEO need thorough probe.

*Handwritten signature/initials*

**RECOMMENDATIONS**

- i. Seniority list may be revisited & corrected accordingly as per laws.
- ii. Special DPC meeting may be called and Mr. Mustaq Mushtaq Ahmad SCT may be promoted as SST with all back benefits from the date when his junior were promoted.

- iii. Mr. Noor Ali and Ajam Khan may be demoted / reverted to their original post of SCT / CT. They may be, however, considered subsequently for promotion after ascertaining their due seniority position and availability of posts.
- iv. Mr. Noor Mehmood may be removed from the post of ADEO and transferred / posted in school against his original post of SST.
- v. Disciplinary action may be imitated against the negligent DEO, ADEO (Estab) & dealing hand in the Directorate of E&SE under E&D Rules, 2011 for issuance of incorrect Seniority list and thereafter giving illegal promotion to junior teachers.
- vi. Instructions may be issued to the Directorate of E&SE and DEOs to invariably mention date of DPC in the promotion notifications / orders as in the existing notifications, no date of DPC mentioned.
- vii. Directorate of E&SE may be directed to strictly follow the tenure policy and shuffle the officials in offices having tenure <sup>of</sup> two (02) years or more.



(LAL SAEED KHATTAK)  
Deputy Secretary (B&Trg) E&SED /  
Inquiry Officer



**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**  
**CIVIL SECRETARITE PESHAWAR**  
**(PHONE NO. 091-9223587)**

Annexure "D"

11

SO(PE)/E&SED/5-1/Misc-Gen/IR/M.A/2022

Dated Peshawar the, September 16<sup>th</sup>, 2022

**REMINDER**

To

1. The Director,  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa
2. District Education Officer (M) Kohistan Upper.

Subject: - **INQUIRY REPORT**

I am directed to refer to this Department letter of even No. dated 08.09.2022 regarding implementation of inquiry report conducted by Mr. Lal Saeed Deputy Secretary Board & Training in respect of Mr. Mushtaq Ahmad SCT and to remind that implement the recommendations of the inquiry within **THREE Days** under intimation of this Department, please.

**Encl.As above.**

(MUHAMMAD ISHAQ)  
SECTION OFFICER (PE)

Copy forwarded to the; PS to Secretary, E&SE Department Khyber Pakhtunkhwa.

SECTION OFFICER (PE)  
16/9/22

Updated Revised Seniority List

Scanned with CamScanner

Annexure "E"

12

DISTRICT EDUCATION OFFICER (MALE) DISTRICT KOHISTAN UPPER

CORRECT FINAL SENIORITY LIST OF CT/SCT TEACHERS (MALE) DISTRICT KOHISTAN UPPER

S No	Name of Teacher	Qualification		Father Name	BPS	Date of Birth	Domicile	Date of First entry into Govt. Service	Date of appointment as trained teacher	Place of posting	Remarks
		Academic	Professional								
1	Muhammad Shah	MA	CT/B.Ed	Muhammad Tabir	16	12/10/1964	Kohistan	15/11/1983	06/04/1999	GHS Lohi	
2	Muhammad Qaribullah	BA	CT	Malik Noman	16	01/12/1970	Kohistan	08/02/1992	07/04/1999	GHS Shatal	
3	Habib ur Rahman	FA	CT	Malik Shadat	15	10/01/1972	Kohistan	06/04/1999	31/03/2002	GMS Bangoo	
4	Muhammad Yousaf	BA	CT	Sultan Khan	16	10/01/1973	Kohistan	06/04/1999	31/03/2002	GHS Lohi	
5	Muhammad Younas	BA	CT	Abdul Qadoos	16	09/04/1977	Kohistan	06/04/1999	29/01/2003	GHS Ekeel	
6	Raja Sher Khan	BA	B.Ed/CT	Malik Pirzada	16	06/05/1968	Kohistan	23/5/1992	29/05/2004	GHS Jal Kot	
7	Mushiq Ahmad	BA	B.Ed/CT	Malik Ali Said	16	09/09/1970	Kohistan	04/08/1999	29/05/2004	GHS Jal Kot	
8	Sadiq Hussain	BA	B.Ed/CT	M. Ali	16	05/12/1970	Kohistan	12/08/1999	29/05/2004	GHS Kafar Banda	
9	Ajam Khan	M.Sc. BS	M.Ed/B.Ed/CT	Ahmad Jee	16	01/05/1971	Kohistan	21/3/1990	29/05/2004	GHS Jal Kot	
10	Nowshir Wah	BA	CT/B.Ed	Zareef Khan	15	08/06/1975	Kohistan	29/5/2004	29/05/2004	GHS Dassu	
11	Mushiq Ahmad	BA	CT/B.Ed	Mohd Amir	16	04/09/1983	Kohistan	29/5/2004	29/05/2004	GHS Bar Bela	
12	M. Sirajud Deen	MA	CT/B.Ed	Madad Khan	16	13/12/1968	Kohistan	05/04/1999	06/07/2004	GHS Harban	
13	Ghulam Jan	FA	CT	Akbar Khan	15	05/05/1977	Kohistan	06/04/1999	28/12/2004	GMS Mamokser	
14	Muhammad Faqeer	MA	M.Ed/B.Ed/CT	M Qadeer Khan	16	01/06/1968	Kohistan	14/5/1992	12/01/2006	GHS Chuchang	
15	Abdul Hakeem	BA	M.Ed/CT	Abdullah Jan	16	12/12/1979	Kohistan	02/12/2006	02/12/2006	GHS Kafar Banda	
16	Abdul Wakil	MSc/Pak	M.Ed/CT	Lal Khan	16	20/12/1973	Kohistan	23/1/1995	07/12/2008	GHS Bar Bela	
17	Saif-ur-Rahman	BA	CT	Rasool Shah	16	01/04/1978	Kohistan	14/08/2007	14/09/2007	GHS Kafar Banda	
18	Gul Nawaz	BA	CT/B.Ed	Sakhawal Khan	16	02/02/1984	Kohistan	01/06/2008	06/01/2008	GHS Paroo Bella	
19	Muhammad Din	FA	/DE	Zour Das Khan	15	15/5/1965	Kohistan	26/11/2008	26/04/2008	GMS Barigoo	
20	Barkat Shah	BA	CT-2nd	Zahoraq	16	01/03/1986	Kohistan	24/4/2008	30/03/2010	GCMNS Dassu	
21	Fazal Mehmood	BA	CT	Muhammad Sharif	16	12/05/1986	Kohistan	14/8/2007	09/07/2010	GHS Teyal	
22	Akmalullah	MA	CT/B.Ed	Sardar Khan	16	06/05/1962	Kohistan	30/08/2012	30/08/2012	GHS Shatal	
23	Muhammad Younas	BA	CT	Khalid Khan	16	08/03/1984	Kohistan	05/11/2003	31/03/2015	GHS Bar Bela	

Scanned with CamScanner

25	Durrani	BA	CT	Jehan Zeb	16	15.03.1968	Kohistan	21.08.2015	21.08.2015	GHS Seo	
26	Class Shah	BA	CT	Sad Bor	16	06/01/1969	Kohistan	16.05.1992	01/09/2015	GHS Lohi	
27	Muhammad Saif	BA	B.Ed	Haji Shan	16	05/08/1972	Kohistan	16.05.1992	01/09/2015	GHS Seo	
28	Shahbaz Khan	M.Sc	CT	Saifur Malook	15	05/10/1995	Kohistan	10.03.2016	10.03.2016	GMS BELA JALKOT	
29	Asad Zada	MA	CT	Jamdad Khan	15	03/02/1983	Kohistan	09.03.2016	09.03.2016	GMS Kuz Kamla	
30	Sir Amir	MBA	CT	Afsar Khan	15	03/04/1985	Kohistan	15.03.2016	15.03.2016	GMS Pan	
31	Muhammad Atiq	BBA Hon	CT	Farooz Khan	15	10/04/1989	Kohistan	10.03.2016	10.03.2016	GMS Mamok Sar	
32	Alam Zada	M.Sc/M.A	M.Ed/B.Ed	Khan Zada	15	03/01/1986	Kohistan	15.03.2016	15.03.2016	GMS Karang	
33	Muhammad Nadeem	MA	CT/B.Ed	Ezhar ur haq	15	02/05/1992	Kohistan	01.04.2017	01.04.2017	GMS Gullab Abad	
34	Naval Ur Rehman	BA	CT	Magar Shah	15	07/05/1989	Kohistan	31.03.2017	31.03.2017	GHS Jalkot	
35	Zia Ur Rehman	BA	CT	Nadra Shah	15	19.08.1989	Kohistan	31.03.2017	31.03.2017	GMS Mamokiser	
36	Javed Iqbal	MA Isl	CT	Siral Shah	15		Kohistan	31.03.2017	31.03.2017	GMS Summar Nala	Removed from Service
37	Shafiqur Rehman	BA	CT	Aqleem Khan	15	01.01.1993	Kohistan	31.03.2017	31.03.2017	GHS Jalkot	
38	Ser Shah	BA	CT	Hedayat ul Lah	15	05/10/1993	Kohistan	31.03.2017	31/03/2017	GMS Dargah Harban	
39	Rasheed Ahmad	MA	CT	Furqan	15	07/11/1995	Kohistan	01.04.2017	01.04.2017	MK Gabriel	
40	Noor	M.A/M.Sc	M.Ed/B.Ed	Subar Khan	15	01/01/1982	Kohistan	04.04.2017	04/04/2017	GMS Goshali Jalkot	On Disable Quota
41	Fazal Rabi	BA	CT	Muhammad Zaid	15	02/03/1975	Kohistan	04.08.2017	04.08.2017	GMS Dugha Seo	
42				Haji Muzammil	16	23/02/1971	Kohistan	28.05.1997	01.07.2018	GCMHS Daasu	Reinstated into service via Hon'ble Additional Dy. Commr. Jalkot vide G.O. No. 119 of 2015 with effect from 01.07.2015. Service Agency of the applicant was not counted w.e. 01/01/2007 to 30.06.2018 and DEO (M) advised a GMS Dargah Harban against the post vide G.O. No. 6045 of dated 15/08/2018 and later on promoted to the post vide G.O. (date not mentioned) dated 17/11/2021. He was promoted to SS (I) vide G.O. (date not mentioned) dated 74 March 2022.
42	Fazal Rabi	BA	CT	Nomi Haq	15	20-11-1969	Kohistan	04.08.2017	un trained	GMS Dugha Seo	

**CERTIFICATE**

1. Certified that the seniority is final, undisputed and non judicious.

District Education Officer

Annexure



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

**KOHISTAN Upper**

No. 2562

Dated 19/09/2022

To,

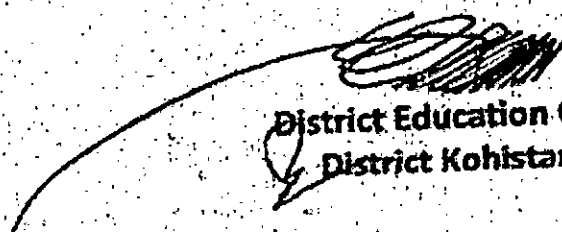
The Director,  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.

Subject: **INQUIRY REPORT/UPDATION OF SENIORITY LIST/WORKING PAPERS.**

Memo,

Reference your good office letter No. 2549-50/F.No.K-1/SST (M) Promotion Kohistan dated Peshawar the 15-09-2022, on the subject cited above.

With due reverence it is stated that please find enclosed updated seniority list/working papers attached herewith it in the compliance of your good office as referred above for your perusal and onward proceeding accordingly, please.

  
District Education Officer (M)  
District Kohistan Upper