

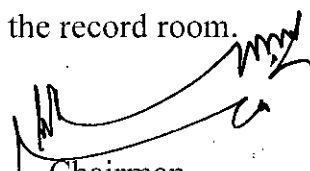
682/15

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 in connected service appeal No. 684/2015 entitled "Fazal Hadi Vs. The Government of Khyber Pakhtunkhwa through Secretary, E&SE, Peshawar and others", 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

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. Appellant seeks adjournment to submit rejoinder. To come up for rejoinder and arguments on 19.02.2018 before the D.B at camp court, Abbottabad.

  
Member

  
Chairman  
Camp court, A/Abad.

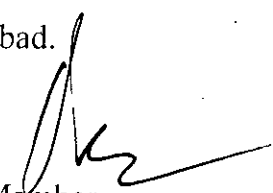
19.5.2016


Appellant in person, Mr. Muhammad Tauqeer Khan, Assistant alongwith Mr. Muhammad Siddique, Sr.GP for the official respondents and counsel for private respondents No. 4 to 9 present. Written reply by private respondents submitted. Written reply by official respondents already submitted. The appeal is assigned to D.B for rejoinder and final hearing for 20.09.2016 at camp court, Abbottabad.

  
Chairman  
Camp Court, A/Abad.

20.09.2016


Appellant in person, Mr. Haq Nawaz, ADO alongwith Mr. Muhammad 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

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

17.11.2015

Appellant in person present. Security not deposited. Directed to deposit the same without fail within a week, where-after notices be issued to the respondents for written reply/comments for 18.2.2016 before S.B at Camp Court A/Abad.


Appellant Deposited  
Security & Process Fee

  
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 to 9 present. Wakalat Nama submitted. Written reply by official respondents No. 1 to 3 submitted while request for adjournment was made on behalf of private respondents No. 4 to 9. To come up for written reply/comments on behalf of private respondents No. 4 to 9 on 19.5.2016 before S.B at Camp Court A/Abad.

19.5.2016

Appellant in person, Mr. Muhammad Tauqeer Khan, Assistant alongwith Mr. Muhammad Siddique  for the official respondents and counsel for private respondents No. 4 to 9 present. Written reply by private respondents submitted. Written reply by official respondents already submitted. The appeal is assigned to D.B for rejoinder and final hearing for 20.09.2016 at camp court, Abbottabad.

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.

  
Chairman

14.9.2015



None present appellant. Security has not been deposited. Notice to appellant and his counsel be issued for 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. 682/2015

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. Muhammad Razaq Shah 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>

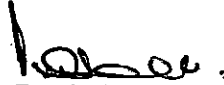
This is an appeal filed by Mr. Muhammad Razaq Shah today on 21/05/2015 against the order dated 28.10.2014 against which he preferred/made a departmental appeal on 22.02.2015 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature 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. Documents referred to in the memo of appeal are not attached with the appeal that may be placed on it.
5. Eleven more copies/sets of the appeal along with annexures i.e. complete in all respect may be also be submitted with the appeal.

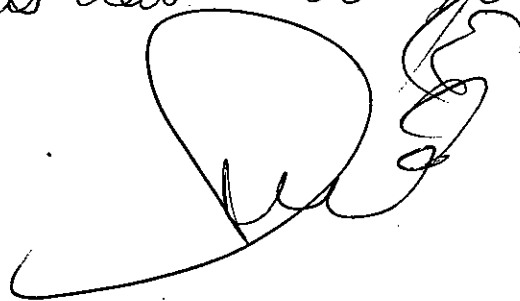
No. 780 /ST,

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 Wakalat
- ④ Documents have been attached
- ⑤ Copies have been filed



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 682 /2015

Muhammad Razaq Shah

.....Appellant

Versus

The Govt. of KPK and  
others

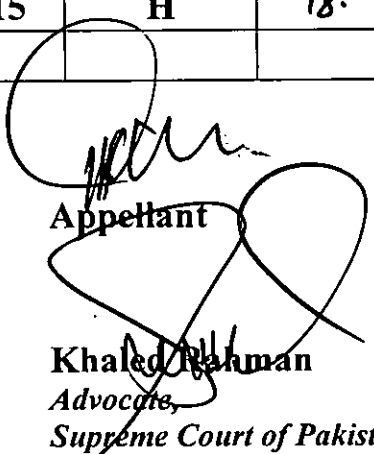
.....Respondents

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 Rahman  
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. 682/2015

A.W.P. Province  
Service Tribunal  
Diary No. 523  
Dated 21-5-2015

Muhammad Razaq Shah  
PSHT, GPS Nowshera, 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 Jambura, 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  
and filed.

Registrar,

17/6/15

**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.

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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 25.03.1992 and was then promoted to the present position on 01.03.2013. He has rendered 23 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.11.
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. It is pertinent to submit here that other 02 colleagues of the appellant namely Muhammad Yousaf and Fazli Hadi, on such information, submitted a combined application

(*Annex:-B*) 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 Muhammad Yousaf and Fazli Hadi similarly placed teachers 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 names of Muhammad Yousaf and Fazli Hadi similarly placed teachers were also forwarded for promotion but in vain.

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

  
Khaled Rahman,  
Advocate, Peshawar

Dated: \_\_\_/05/2015

Promotion of PSAT to SST (3)

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	Arshad Khan	Mirhan Dad	MA (I) BA-94 B-Ed	475/1000 247/350 511/1000	2nd 2nd 2nd	Peshawari -do- -do-	11/11/1981	11/2/2013	11/5	4	L	L	L	L	L	X
02	Abdul Raheem	Nasrat Khan	MA B BA 91 B-Ed	590/1000 253/350 511/1000	2nd 2nd 2nd	-do- -do- -do-	10/7/84	-do-	20	L	L	L	L	L	L	X
03	Misra Muhammad Khan	Bahadar Khan	BA-97 B-Ed	287/350 560/900	2nd 2nd	Peshawari AIOU	1/8/85	-do-	23	L	L	L	L	L	X	X
04	Abbas Ghulam	Mustafiz	BA B-Ed	542/900 552/800	2nd 2nd	AIOU AIOU	2/10/88	-do-	18	L	L	L	L	L	L	X
05	M. Javed	Sarwar Jan	BA B-Ed	273/350 504/1000	2nd 2nd	Peshawari -do-	1/10/88	-do-	17	L	L	L	L	L	L	X
06	M. Javed	M. Tayyeb	BA B-Ed	477/900 519/900	2nd 2nd	AIOU -do-	1/10/88	do	17	L	L	L	L	L	L	X

(07) Habib-ullah Shulwan Haider  
 MA 579/1000 2nd Huzara  
 BA 59% 2nd AIOU 263/90  
 B-Ed 55% 2nd AIOU

Annex A (5)

App. List  
 Signature  
 Date

Muhammad Tayyeb  
 H.M.  
 GHS No.2 Battagram

Muhammad Shuaib Khan  
 Principal  
 GHSS Kuza Banda

Certified to be True Copy

Dis. List

Promotion of PSAT to SSC(S).

6

S.No	Name	Father Name	Qualifica:	Marks	Division	Name of Institute	Date of 1 <sup>st</sup> Appoin:	Date of Promotion To Present	S.List #	Synopsis	ACR	Result	Non Inv: Cert:	BA/Bsc Degree	B.Ed Degree	M.Ed Degree
08	M. Yousof	Abdur Rehman	MA BA B.Ed	590/1100 251/550 501/1000	2nd 2nd 2nd	Peshawari do do	5/8/86	11/2/2013	219	✓	✓	✓	✓	✓	✓	X
09	Fazal Hadi	M. Nazam	MA BA B.Ed	285/500 486/900	2nd 2nd	Peshawari AIOU	26/12/90	-do-	235	✓	✓	✓	✓	✓	✓	X
10	Kifayatullahi	Sherin Khan	BA B.Sc	576 557	2nd 2nd	AIOU AIOU	2/6/1988	-do-	230	✓	✓	✓	✓	✓	✓	X
11	M. Rajat 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	289/500 504/900	2nd 2nd	Peshawari AIOU	29/1/88	-do-	271	✓	✓	-	-	-	-	X

13) Jameel Khan. Murad Khan. BA 549/900 2nd AIOU. 3/9/83 -do-  
B.Ed 687/1100 1st AR Khan uni.

14) Muhammad Khurshid Khan. BA 524/1100 2nd AIOU. 9-9-87 -do-  
B.Ed 528/1000 1st do

Muhammad Tayyeb  
HM  
GHS No.2 Battagram

DMC Form Net.

Muhammad Shafiq Khan  
Principal  
GNSS Raza Banda

4/11/2014  
GHS No.2 Battagram

6/2013

(میل) ٹیگرا م

خدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحب

ANNEX B

2071

21/10/2021

7

SET  
عنوان: درخواست برائے جانچ ٹریٹمنٹ سٹیٹس

آداب! گزشتہ خدمت ہے کہ ہم دو ٹیگرا محمد یوسف - P.S.H.T. - GPS جو نڈار اور رضیہ پوری

P.S.H.T. - GPS ہفاکوٹ کا نام S.E.T. سٹیٹس میں بالترتیب نمبر 7 اور نمبر 7 کا

اب جبکہ جو جوہرہ لسٹ میں ہر دو ٹیگرا کا نام غائب ہے۔ جو جوہرہ سٹیٹس میں

جناب والا کی توجہ چند بے قاعدگیوں کی طرف منبہول کرانے کی جسارت کرتے ہیں۔

1۔ یکم آپ کی قائم کردہ کمیٹی برائے سٹیٹس کی سٹیٹس کی سٹیٹس میں غیر ذمہ دار

استخاص نے جان بوجھ کر ٹیگرا کی ہے۔ جبکہ کمیٹی کے ممبران محمد سٹیٹس صاحب ایجازہ پورہ

G.H.S.S کوزہ بانڈہ اور محمد طیب صاحب G.H.S. ٹیگرا م 2۔ کے دستخط ان کی سٹیٹس

لسٹ میں موجود ہے۔

2۔ جو جوہرہ لسٹ پر کسی بھی ذمہ دار شخص کی دستخط نہیں ہے کی کمی ٹیگرا پورہ کی

3۔ یہ کہ جو جوہرہ لسٹ میں نمبر 6 پر شامل کردہ نام لو اب سٹیٹس کا جو کہ ای اندر کی ڈگری

سے ناطل محترم ہے۔ اور نمبر 6 پر جوہرہ سٹیٹس میں نمبر 12 پر تھا۔ اور وہ 1992 کا ہے

بائیں ہے۔ جبکہ اس سے سینیئر اساتذہ کو نظر انداز کیا گیا ہے۔

لہذا جناب کی خدمت میں التماس کی جاتی ہے کہ اس کی توجہ فرمائیں۔

الضافہ خیرا ہم کیجائے۔

عین نواز مس پوری

الحاضر

محمد یوسف

محمد یوسف - P.S.H.T. - GPS - جو نڈار - (2) رضیہ پوری - P.S.H.T. - GPS - ہفاکوٹ

True Copy



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

Phone # 0997311439 & 0997310670

*Annex C* (8)

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

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.

*26/21/10/2014*  
ADEO (Estt.)  
Battagram

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

Copy to the:

- i. PA to DEO
- ii. Office Copy

*Received*  
*37/10/2014*  
Certified to be  
True Copy

ADEO (Estt.)  
Battagram

C





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

PH No. 091-9210389, 9210938,  
9210137, 9210957, 9210468  
Fax 091-9210936, 0800-33857  
E-mail rafiq\_kk851@yahoo.com

9

**Notification**

ANNEX D

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 PSHI/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 PSHI/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

reporting immediately for proposals & adjustment, etc. Certified to be True Copy.

29/10/14

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 Ganawal	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	02
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 Puzang	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	02
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 Tailoos Allai	4/14/1965	-----do-----

### 5. PROMOTION OF STT/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 STT/TT	02
Posts available for promotion	02
Promoted through this order	02

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**Posts available for promotion  
Promoted through this order**

22

22

S.No	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	06.01.1961	do
3	4	Saifur Rehman	GHS Tailoos	04.04.1965	do
4	5	Muhammad Israil	GHS Chappargram	01.05.1962	do
5	24	Abdul Wahab	GHSS Kuzi Banda	01.11.1960	do
6	27	Amir Muhammad	GHSS Kuzi 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 Kuzi 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

11

**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.No	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/Jungir	11/3/1966	do

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S. No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	28	Amwar 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	Muhammad 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
5% share for Promotion.	7
3 % Share of promotion of S Qari/Qari	41
Posts available for promotion	02
Promoted through this order	02

S.N. No	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	22	Ikramullah	GHS Chapparagram	5/4/1972	Services placed at the disposal of DEO (M) Battagram for further posting against SST (General) post on school based.
2	23	Ranqaz Khan	GHS Bama 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 / /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 (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

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

NO. 1659 DATED 31-10-14

13

To,

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, B-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 securitized by the following committee: Copy attached.

1. Muhammad Tayyeb, EM GIS: No-2 Battagram.
2. Muhammad Shuaib, Principal, GISS Kuza Banda. } copy enclosed

SUB-DIVISIONAL EDUCATION  
OFFICER (MALE) BATTAGRAM.

31/10/14

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 Jambura	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-----

21	Muhammad Naseem SCT	GHS Thakot	GHS Hutal 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.

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Date

16

## CONSEQUENTIAL ADJUSTMENT

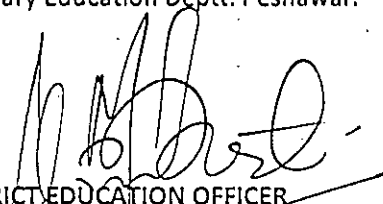
Syed Abdus Sattar Shah SST (Bio,Ch) GCMHS Battagram working against SST (Math, Ph) Post is consequentially adjusted at GHS Phagora against vacant post of SST (Bio,Ch) on his own pay and scale in the interest of public service with immediate effect.

MUHAMMAD SHAIKAT  
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

29/10/14

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1687 / SDEG (M)

Dated, 11/11/2014

From:

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

ANNEX 9  
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.

S.No.	Name of Teacher	Fathers Name	School	BPS & Desig:	Remarks.
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.

Notes:

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 securtinzied by the following officer.

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

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SUB: DIVISIONAL EDUCATION  
OFFICER (MALE) BATTAGRAM.  
11/11/14

ANNEX H<sup>3</sup>

18

بخدمت جناب سیکرٹری صاحب ایلیمنٹری اینڈ سیکنڈری ایجوکیشن خیبر پختونخواہ پشاور

مساطت: DEO: بنگرام

نمبر: 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۔

تائب عالی!۔ اپیل ذیل عرض ہے۔

یہ کے مسائل محکمہ تعلیم میں PSHT کے طور پر خدمات سرانجام دے رہا ہے محکمہ تعلیم بگرام میں ایس ایس ٹی کی 11 آسامیاں Create ہوئی تھیں جس کیلئے DPC نے محکمہ کیلئے کو ایفٹائیڈ پرسن کی ایک میرٹ لسٹ مرتب کی اور گیارہ افراد کی لسٹ محکمہ کی حوالے کر دی۔ نقل میرٹ لسٹ لف ہذا ہے۔

یہ کے بوقت آرڈر اور پروموشن اول 6 افراد کو ایس ایس ٹی کے پر طور پر موٹ کر دیا گیا تھا۔ اور بقایا پانچ اساتذہ میں سے مسائل کو بھی ڈراپ کر کے دیگر افراد کو پروموشن کیا گیا۔

یہ کہ DPC کمیٹی مورخہ 4/11/2014 کو ہو کر میٹنگ 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 ہے ان کا بیان قلم بند ہے۔

یہ کہ مسائل 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 بھیجنے سے انکار کر رہے ہیں۔

یہ کہ جن افراد کو پروموشن کرنے کی سفارش کی گئی ہے اس میرٹ لسٹ پر کسی بھی بنا پر 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 مسائل کو اس کا حق دلا کر پروموشن کیا جائے۔

تین نوازش ہوگی

العارض

محمد رزاق شاہ (PSHT) GPS نوٹیفیکیشن بگرام

22/02/15

Certified True Copy

16A

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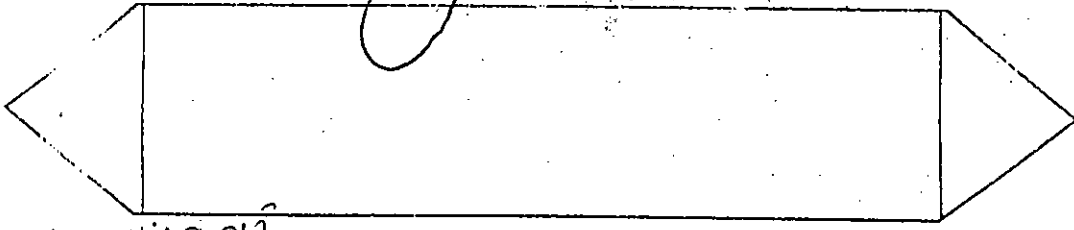
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اس کی قیمت کو دیکھ کر اس کی قیمت کو دیکھ کر

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# بعدالت موکل لکھنؤ



20 جناب اسد  
حیدرآباد سکیم قلعہ

مورخہ  
مقدمہ  
دعویٰ  
جرم

## باعث تحریر آنکہ

مقدمہ مندرجہ عنوان کمال میں اپنی طرف سے واسطے پیروی و جو اسے وہی وکل کاروائی متعلقہ  
 آنا مقام کیلئے صاحب کاروائی کے نام سے  
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
 وکیل صاحب کو راضی نامہ کرنے و تقررات ہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور  
 ضرورت ڈگری کرنے اجراء اور سولی چیک و رد پیا 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  
 کے وکل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
 ہوگا۔ اور صاحب مقرر شدہ کو یہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ  
 پر داخستہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔  
 کوئی تاریخ پیشی مقام دورہ پر ہر یا حارسے باہر ہو تو وہیں صاحب پابند ہوں گے۔ کہ پیروی  
 مذکور کریں۔ لہذا وکالت نامہ لکھنؤ یا کہ سند ہے۔

20 مارچ 1920

وکیل  
 کے لئے منظور ہے۔  
 بمقام

# وکالت نامہ

کورٹ فیس  
قیمتی

بجالات جناب Believe the K.P.C. Sami Trainee

نام M. Raees, Shih Secretary

دعوے یا ترم Appeal راجب Resp No 4 to 9

باعث تحریر آنکے

برائے پیشی یا MS BOTANAS مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی  
تصفیہ مقدمہ بمقام

Aamery in cheam aduceate

ARSON ARAD ایڈووکیٹ ہائی کورٹ۔ سپریم کورٹ۔ ممبر ڈسٹرکٹ بار ایسوسی ایشن

کے لئے کو حجب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بروقت  
پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پت مظہر حاضر نہ ہو 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 یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان  
پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا بخاندانہ کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں  
گے۔ مجھے کل ساختہ پرداختہ صاحب مثل کردہ بذات از خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ یا جواب دعویٰ درخواست  
اجراء ڈگری و نظر ثانی اپیل و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کروانے اور ہر قسم کاروبار  
وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر ثالثی و راضی نامہ بر حلف کرنے اقبال دعویٰ دینے کا بھی  
اختیار ہوگا اور بصورت جانے بیرون نجات از پکھری صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا ترقی یا  
گرفتاری قبل از گرفتاری و اجراء ڈگری بھی صاحب موصوف کو شرط ادا ہوگی علیحدہ مختار پیروی کا اختیار ہوگا۔ اور بصورت ضرورت  
صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکور یا اس کے کسی جزو کی کارروائی کے یا بصورت اپیل کسی دوسرے وکیل یا ایئر سٹریک کو اپنے  
جگہ یا اپنے ہمراہ مقرر کریں اور ایسے قانون کو بھی ہر امر میں ادنیٰ اور ویسے ہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو  
حاصل ہیں اور دوران مقدمہ جو کچھ ہرگز نہ ہونے سے گاہ 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۔

لہذا وکالت نامہ لکھ کر دیا ہے کہ سند رہے مورخہ 18 ماہ 2-16-20

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

Bahadar Sherishi  
GHS Jambriga

Nazim Muhammad ssi  
GHS Hill-

Muhamm akbar ssi  
GHS Muzga banda

Tawab said ssi  
GHS Bilandkot

Muhammad Khurshed,  
GMS, Jaisal M. N. A.

Accepted by  
[Signature]

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

Service Appeal No. 682/2015

Muhammad Razaq Shah .....Appellant

VERSUS

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

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S.No	Description /Documents	Annexure	Pages
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2	Affidavit		5
3	Policy	A	6-12
4	Seniority list	B	13-18

**RESPONDENT**  
District Education Officer  
(M) E&SE  
Battagram

**BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER**

**PAKHTUNKHWA CAMP COURT ABBOTTABAD**

Service Appeal No. 682/2015

Muhammad Razaq Shah .....Appellant

VERSUS

Government of Khyber Pakhtunkhwa 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 or 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.
5. That the appeal is time barred by law hence liable to be dismissed on this score alone.

**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

to ff  
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 remaining Para is in correct.

3. That in reply to para3, the appellant is junior in all  
respect from respondent numbers 4 to 9 and promotion  
order was issued as per seniority list dated 31/12/2102,  
and in seniority list dated 31/12/2012 the appellant  
placed at serial No 255 and respondents placed as  
under.

- (I) Nazir Muhammad serial No 22.
- (II) Tawab Said serial No 75.
- (III) Shad Muhammad serial No 129.
- (IV) Muhammad Khursheed serial NO 131
- (V) Bahadar Sher serial NO 163.
- (VI) Ghulam Akbar serial No 169

The 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 the respondent  
No 3, Hence para is incorrect and appeal of the  
appellant is liable to be dismissed being not  
maintainable.

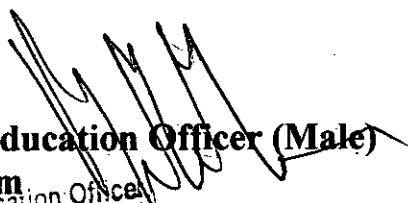
4. Para 4 Needs No comments.



Grounds:

- a. **Incorrect:** Notification was issued by the competent authority according to rules and policy, and the appellant has been treated lawfully.
- b. That in reply to para "B" of the appeal the appellant was junior and his name is placed at serial no 255 of the seniority list, Therefore respondents no 1 to 3 dropped his name for promotion, hence para is incorrect.
- 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 respondent's 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 and his name was included due to clerical mistake. He has been replaced by the next senior and eligible PSHT namely Shah Abdul Aziz occupying serial No 186 in seniority list.
- e. Para "E" needs no comments.

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

  
**District Education Officer (Male)**  
**Battagram**  
District Education Officer  
(M) E&SE  
Battagram

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

  
**Director of E&SE**  
**Khyber Pakhtunkhwa**

**BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER**

**PAKHTUNKHWA CAMP COURT ABBOTTABAD**

Service Appeal No. 682/2015

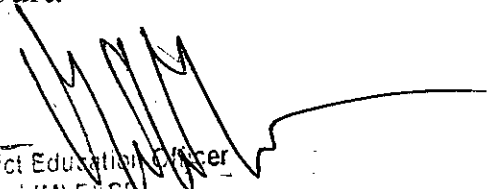
Muhammad Razaq Shah .....Appellant


**VERSUS**

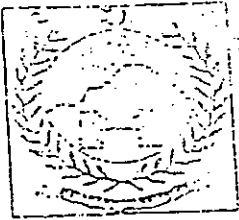
**Government of Khyber Paktunkhwa through Secretary Education  
and others.....Respondents**

**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.

  
District Education Officer  
(M) E&SE  
Battagram

  
ADEO (Lit :) (Male)  
Battagram



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, 1982, 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&I.D/1-28/2003, Vol-II dated, 09-04-2004, Notification No. SO(G)S&I/1-69/06/Vol-1/DFE/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)	i. At least second class Master's Degree or four years BS Degree in the relevant subject; and  ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A. Education or equivalent qualification from a recognized University.	23 to 35 years	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-15), with at least five years service as such and having qualification mentioned in column No. 3.  Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

6

7

IA	Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	22-35 years	recruitment; and (b) fifty percent by initial recruitment.  (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.  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.  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  (b) fifty percent by initial recruitment; and
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(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 Physics, Maths "A" or "B" or Statistics Or (c) Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p><u>B-ed</u> 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>	2110 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 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</p>

			<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;</p> <p>(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;</p> <p>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;</p> <p>(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;</p>
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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;

(c) 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;

(d) twenty per cent from amongst the Primary School Head Teachers (BPS-16),

Primary School Head Teachers, 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

(B-A) B-ed

PSHT, SPST & PST

Seniority-cum-fitness



(10)

(11)

PSHT

			<p><u>Primary School Head Teachers</u> for promotion then the post shall be filled by promotion, on the basis of <u>seniority-cum-merit</u>, from amongst <u>Senior Primary School Teachers</u> with at least <u>seven years</u> service as <u>Senior Primary School Teachers</u> and <u>Primary School Teachers</u> and having qualification mentioned in column No.3:</p> <p>Provided further that if no suitable candidate is available from amongst <u>Senior Primary School Teachers</u> for promotion then the post shall be filled from amongst <u>Primary School Teachers</u> with at least seven years service as such and having qualification mentioned in column No.3, and</p> <p>Note:</p> <ol style="list-style-type: none"> <li>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.</li> <li>II. Posts of <u>General SST</u> and <u>SSTs-1 Science</u> and <u>SST-2 Science</u> shall be filled by promotion or initial recruitment, each on</li> </ol>
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1905/13 SPST-67

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

12

Encl : 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, Classification and Teacher Recruitment Khyber Pakhtunkhwa Peshawar.
9. The Director, (PTE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESSE Khyber Pakhtunkhwa Peshawar.
11. The Director, ESSE Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (SSSE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officer (MSE) 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)

(7)

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

(P) (12) (1)

Amun  
B  
12

S. No	NAME OF SCHOOL.	NAME OF TEACHER	FATHERs NAME	DOMICILE	QUALIF ICATION	Date of 1st appointment	Date of Passing PTC Exam:	Date of Birth	Joining/ Trained From/ Seniority Count From	Remarks
		Shah Rozam	Mian Abdul Aziz	Battagram	FA/CT	10/12/1974	24/10/1974	12/12/1955	24/10/1974	
1	GPS Karghari	Taj Muhammad ✓	Nashed Mian	Battagram	BA/CT	12/07/1974	19/03/1975	05/10/1954	19/03/1975	
2	GPS Der Kad	Azizur Rehman ✓	Said Muhammad Khan	Battagram	BA/CT	24/9/1975	21/10/1975	04/10/1953	21/10/1975	
3	GPS Shaukatabad	Gul Rehman ✓	Haqa Jan.	Battagram	MA/CT	16/10/1973	21/10/1975	08/07/1955	21/10/1975	
4	GPS Jhangri	Jan Muhammad ✓	Sharab Khan	Battagram	FA/CT	09/07/1976	21/10/1975	20/3/1955	09/07/1976	
5	GPS Mir ali qalla	Syed Sultan Shah ✓	Hazrat Shah	Battagram	BA/CT	09/07/1976	21/10/1975	13/1/1956	09/07/1976	
6	GPS Shatal	Bais kha.	Taus Khan	Battagram	BA	24/8/1978	26/8/1978	01/01/1954	26/8/1978	
7	GPS Gondore	Niaz Muhammad ✓	Mian Gul	Battagram	BA	21/11/1979	16/1/1978	04/10/1957	21/11/1979	
8	GPS Bandabala	Saif Malak ✓	Ghulam Jalal	Battagram	FA/CT	17/10/1980	30/9/1980	30/4/1962	17/10/1980	
9	GPS Agha Sharam	Unar Dad ✓	Zewer Khan	Battagram	FA/CT	11/12/1981	20/5/1981	01/02/1962	11/12/1981	
10	GPS Barkal Qalia	Arsala Kahn ✓	Mian Dad	Battagram	MA/B.Ed	13/11/1981	30/9/1981	08/09/1959	13/11/1981 ✓	
11	GPS Nathu	Abdul Wahid Shah ✓	Abdul Qadir Shah	Battagram	BA/CT	13/11/1981	30/8/1981	03/03/1963	13/11/1981	
12	GPS Nathu	Amanullah ✓	Muhammed Gul	Battagram	FA/CT	14/11/1981	30/9/1981	04/02/1963	13/11/1981	
13	GPS Batangi	Abdul Hakem ✓	Malvi Abdul Aziz	Battagram	FA/CT	14/11/1981	30/9/1981	03/01/1963	14/11/1981	
14	GPS Batangi	M. Nasim Khan ✓	Sarfaraaz Khan	Battagram	FA/CT	10/08/1982	30/9/1982	30/12/1958	10/08/1982	
15	GPS Batangi Hill	Snad Muhammad ✓	Fida Muhammad	Battagram	BA/CT	10/09/1982	30/9/1982	01/01/1965	10/09/1982	
16	GPS Batangi Hill	Haji Muhammad ✓	Hukmat Khan	Battagram	FA/CT	08/08/1979	14/9/1983	06/06/1954	14/9/1983	
17	GPS Drah Qallah	Muhammed Haroon ✓	Juma Khan	Battagram	FA	25/10/1983	09/10/1984	03/03/1963	09/10/1984	
18	GPS Afitare Kaley	Nazir Muhammad ✓	Khan Mohammad	Battagram	BA	10/07/1984	09/10/1984	01/01/1964	10/07/1984	
19	GPS Banke Rala	Abdul Nazir ✓	Nasbat Khan	Battagram	MA/B.Ed	10/07/1984	05/10/1984	03/11/1966	10/07/1984 ✓	07/10/1984
20	GPS Lander	Gul Faraz kha ✓	Abdul Latif kha	Battagram	FA/CT	10/07/1984	05/10/1984	14/4/1966	10/07/1984	
21	GPS Kozu Banda	Nazir Muhammad ✓	Fida Muhammad	Battagram	MA/CT/BE	08/01/1985	15/6/1985 ✓	06/10/1966	15/6/1985 ✓	
22	GPS Bakra dub	Nisar Muhammad Khan ✓	Bahadar kha	Battagram	BA/CT/BE	08/01/1985	15/6/1985 ✓	10/4/1967	15/6/1985 ✓	
23	GPS Gidin Muhammad kha	Abdul Malik ✓	Gohar Rahman	Battagram	BA/CT	17/5/1984	20/3/1985	26/6/1962	20/5/1985	
24	GPS Kesharam	Elyas Khan ✓	Masool Khan	Battagram	FA/CT	21/5/1987	18/05/1985	10/02/1954	12/05/1987	
25	GPS Sakhati Banda	Abdul Latif ✓	Abdul malak	Battagram	FA/CT	03/11/1985	11/10/1985	01/02/1966	31/12/1985	
26	GPS Jhangri	Amanullah ✓	Shamso	Battagram	FA	28/11/1985	07/01/1986	14/04/1965	07/01/1985	
27	GPS Jhangri	Abdul Wahid ✓	Abdul Jalil	Battagram	FA	12/08/1985	12/7/1986	06/04/1961	13/7/1985	
28	GPS Palach	Khalid Gul ✓	Kali Ahmad	Battagram	FA/CT	08/08/1985	14/5/1985	01/02/1965	14/7/1985	
29	GPS Feringi	Syed Muhammad Qesorshah ✓	Shah Madar	Battagram	FA/CT	28/8/1985	14/7/1986	01/05/1966	14/7/1986	
30	GPS Feringi and arid	Abdul Manan ✓	Abdul Khalid	Battagram	FA/CT	14/11/1985	14/11/1985	05/09/1956	14/7/1986	

71	GPS	Nogram.	ADOUR KASHIU							
72	GPS	Siari	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	25/12/1981	26/5/1987 ✓	03/05/1961	26/5/1987 ✓
76	GPS	Gurati ashory	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	Shulam Jelani ✓	Muhammad Ibrahim	Battagram	FA/CT	20/8/1982	26/5/1987	09/09/1961	26/5/1987
81	GPS	Gijbari	Husnul Wahab	Aiamgir khan	Battagram	MA/CT	14/5/1981	26/5/1987	02/03/1962	26/5/1987
82	GPS	Bango Banda	Muhamad Khteeb ✓	Mustafa	Battagram	FA/CT	01/06/1982	26/5/1987	03/07/1962	26/5/1987
83	GPS	Lahgri Sar Pamjon	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 W'adood	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	08/01/1963	26/5/1987
95	MOS	Wasma Naryala	Gul Faraz Khan	Aftab	Battagram	FA	05/01/1983	26/5/1987	25/12/1963	26/5/1987
96	GPS	Kassai Tandoal	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.	Khurshheed Muhammad	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 chari 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	Siadano Sar	Gul Faredan	Qadir	Battagram	FA/CT	10/07/1984	26/5/1987	25/3/1965	26/5/1987
103	GPS	D Chajul	Nazimur Rehman	Qadir Khan	Battagram	BA/CT	16/4/1983	26/5/1987	04/10/1965	26/5/1987
104	GPS	Gabref	Niaz Muhammad	Qasim Sar	Battagram	FA/CT	12/12/1983	26/5/1987	04/11/1965	26/5/1987
105	GPS	Tarless	Ferdinand	Qasim Khan	Battagram	FA/CT	10/07/1984	26/5/1987	05/01/1965	26/5/1987
106	GPS	Bango Banda	Saniullah	Qasim	Battagram	FA/CT	10/07/1984	26/5/1987	01/05/1965	26/5/1987
107	GPS	Shamloi	Raj Muhammad ✓	Abdul Malik	Battagram	FA/CT	08/01/1985	27/6/1987	03/05/1965	27/6/1987
108	GPS	Hill	Syad 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	26/01/1987

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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 Tandoor	Ahmad Jan	Muhammad Jabeen	Battagram	FA	08/01/1987	27/6/1987	04/03/1969	08/01/1987
113	GPS	Ganatar	Yar Muhammad	Samandar Khan	Battagram	FA/CT	08/02/1987	27/6/1987	28/4/1967	08/02/1987
114	GPS	Karwar	Niaz Muhammad	Faiz Muhammad	Battagram	FA/CT	08/04/1987	27/6/1987	02/09/1966	08/04/1987
115	GPS	Soorgoi	Niaz Muhammad	Muhammad Amin	Battagram	FA/CT	08/04/1987	27/6/1987	04/09/1966	08/04/1987
116	GPS	Shamano Seri	Khail Muhammad	Hussain Khan	Battagram	BA/CT	08/04/1987	27/6/1987	04/11/1969	08/04/1987
117	GPS	Dhnga	Muhammad Sadiq	Saleh Muhammad	Battagram	FA	23/8/1987	27/6/1987	28/5/1966	23/8/1987
118	GPS	Banna	Abdul Karim	Ghwar Khan	Battagram	FA/CT	09/01/1987	27/6/1987	24/4/1966	09/01/1987
119	GPS	satrom	Habibullah	Muhammad Ayyub	Battagram	FA/CT	09/09/1982	19/11/1987	04/10/1961	19/11/1987
120	GPS	Kohani	Ahmad Hassan	Muhammad Yunis	Battagram	FA	02/07/1982	29/11/1987	17/12/1952	29/11/1987
121	GPS	Sooragi	Muhammad Fazil	Babozay	Battagram	FA	15/8/1977	29/11/1987	14/2/1958	29/11/1987
122	GPS	Kanshai	Bois khan.	Attorab khan	Battagram	FA/CT	01/06/1982	29/11/1987	02/02/1959	29/11/1987
123	GPS	Kannai	Hafizur Rehman	Abdul Qayum	Battagram	FA/CT	01/08/1983	29/11/1987	01/01/1963	29/11/1987
124	MOS	Sofian	Zar Mohommad	Jangir khan	Battagram	FA	03/03/1982	29/11/1987	05/12/1963	29/11/1987
125	GPS	Rupkani	Muhammad Iqbal	Abdul Wahab	Battagram	FA/CT	01/04/1983	29/11/1987	15/8/1964	29/11/1987
126	GPS	Khwar Musa Tangi	Shch Hunar	Baduizaman Khan	Battagram	FA	10/07/1984	29/11/1987	02/01/1965	29/11/1987
127	GPS	Nal Pashto	Muhammad Ayyub	M. Shih shah	Battagram	BA/CT/BA	07/01/1987	12/01/1987	04/05/1961	12/01/1987
128	GPS	Bab	Shad Muhammad	M. Shih shah	Battagram	FA/CT	09/12/1987	02/10/1988	03/09/1963	02/10/1988
129	GPS	Bateela	Mumtaz Ali shah	Abdul Malik	Battagram	FA	09/10/1987	09/10/1988	01/01/1965	02/10/1988
130	GPS	Kmri	Muhammad Kheurshed	Faqir Muhammad	Battagram	FA/CT	09/05/1987	02/10/1988	06/02/1965	09/10/1988
131	GPS	Bar Neahar	Anwarzeb	Muhammad Imran	Battagram	FA/CT	09/10/1987	09/10/1988	01/05/1968	09/10/1988
132	GPS	Batella	Javed Khan	Jehanzeb	Battagram	B/A	09/12/1987	02/10/1988	09/09/1968	02/10/1988
133	GPS	Tarnawa Miodan	Muhammad Nazem	Abdul Qayyum	Battagram	FA/CT	09/10/1987	02/10/1988	03/02/1969	02/10/1988
134	GPS	Mattanlisharg.	Minhaj	Khatob khan	Battagram	FA/CT	09/10/1987	02/10/1988	02/12/1959	03/10/1988
135	GPS	Kamala	Bakht Shaman	M. Mussa	Battagram	FA	09/09/1987	03/10/1988	02/12/1959	03/10/1988
136	GPS	Galshoot	Muhammad Ghffar	Shulam sarwar	Battagram	FA	05/05/1986	07/01/1988	05/11/1960	07/01/1988
137	GPS	Kuz: Tandal	Samullah	Mulang khan	Battagram	FA/CT	09/09/1987	03/10/1988	02/12/1959	03/10/1988
138	GPS	Senno	Akber Khan	Alem Gul	Battagram	FA	05/05/1986	07/01/1988	11/11/1965	07/01/1988
139	GPS	Changil	Muhammad Fareed	Sabir Khan	Battagram	FA	16/5/1985	07/01/1988	01/01/1957	08/01/1988
140	G.M.S	Pashto	Atta Muhammad	Tahmas Khan	Battagram	FA	10/12/1977	08/01/1988	02/02/1957	08/01/1988
141	GPS	Idc	Aman Khan	Abdur Rehman	Battagram	FA/CT	21/9/1983	08/01/1988	06/06/1953	08/01/1988
142	GPS	Ranje	Noorul Islam	Atiqulla	Battagram	BA/CT	20/11/1984	08/01/1988	03/02/1962	08/01/1988
143	GPS	Batte Mori	Ubiadulla	Muhamad Ayyub	Battagram	BA	23/7/1985	08/01/1988	03/09/1962	08/01/1988
144	GPS	Largram	Muhammad Fareeq	Fazal Qadim	Battagram	FA/CT	29/11/1984	08/01/1988	16/4/1962	08/01/1988
145	GPS	Jhangri	Ali Akber	Bara Khan	Battagram	BA/CT	06/02/1984	08/01/1988	03/01/1963	08/01/1988
146	GPS	Thakete	Faqir Muhammad	Barra Khan	Battagram	BA/CT	20/11/1983	08/01/1988	03/01/1963	08/01/1988
147	MOS	Kalesh	Muhammad Youns	Barra Khan	Battagram	BA/CT	06/06/1985	08/01/1988	25/4/1963	08/01/1988
148	GPS	Jabe Shaktect.					04/09/1986	08/01/1988	09/02/1963	08/01/1988

49	GPS	Nika choohan	Afzal Shah	Mahmood Shah	Battagram	BA/CT	26/12/1984	08/01/1988	05/01/1964	08/01/1988	
50	GPS	Jangri	Anwoer Ziab	Sardarey	Battagram	FA/CT	06/03/1984	08/01/1988	05/05/1964	08/01/1988	
151	GPS	Koza Banda	Faida Mohd	Faroz khan	Battagram	BA/CT	06/07/1984	08/01/1988	13/4/1965	08/01/1988	
152	GPS	Takia	Khwaja awaz khan	Dast Muhammad	Battagram	FA	12/03/1984	08/01/1988	05/05/1965	08/01/1988	
153	GPS	Kiari	Ali Rehman	Abdul Rahim	Battagram	FA/CT	12/10/1984	08/01/1988	13/12/1965	08/01/1988	
154	GPS	Trangan	Suba Khan	Amir Khwaja	Battagram	FA	16/5/1985	08/01/1988	01/01/1966	08/01/1988	
155	GPS	Jambora	Mohammad Khan	Attai khan	Battagram	BA	22/5/1985	08/01/1988	02/07/1966	08/01/1988	
156	GPS	Sarbanjar	Mujahid	Ali Gohar	Battagram	FA/CT	28/4/1986	08/01/1988	04/02/1966	08/01/1988	
157	GPS	Sorangai	Muhammad Fayaz	Abdul Latif	Battagram	FA/CT	29/5/1985	08/01/1988	05/05/1966	08/01/1988	
158	GPS	Samal mara	Dilbar khan	Khadi khan	Battagram	FA/CT	19/11/1984	08/01/1988	12/10/1966	08/01/1988	
159	GPS	Dabri	Habibullah	Gul Muhammad	Battagram	FA	29/4/1986	08/01/1988	25/2/1968	08/01/1988	
160	GPS	Taya	Rafiullah	Mohammad Mustafa	Battagram	FA/CT	30/4/1986	08/01/1988	04/10/1968	08/01/1988	
161	GPS	Kassai Tandool	Muhammad Saleem	Gul Muhammad	Battagram	FA/CT	10/01/1988	17/9/1988	03/03/1965	10/01/1988	
162	GPS	Soorgai	Fazli Bari	Malfvi Mohd Saeed	Battagram	BA/BEd	10/01/1988	17/9/1988	15/10/1966	10/01/1988	01/10/1988 ✓
163	GPS	Sijbair	Bahadar Sher	Guli Bagh	Battagram	FA/CT	10/01/1988	17/9/1988	03/03/1967	10/01/1988	
164	GPS	Nehrai	Jan Muhammad	Abdul Khaliq	Battagram	FA	10/01/1988	17/9/1988	16/4/1969	10/01/1988	
165	GPS	Garang	Muhammad Anwar	Muhammad Umar	Battagram	FA/CT	10/01/1988	17/9/1988	03/04/1970	10/01/1988	
166	GPS	Bar Sar	Muhammad Yar	Hussain Khan	Battagram	FA/CT	10/02/1988	17/9/1988	01/01/1961	10/02/1988	
167	GPS	Jobba	Amanulloh	Taloot Khan	Battagram	FA	10/02/1988	17/9/1988	09/04/1964	10/02/1988	
168	GPS	Yaro	Niaz Muhaminad	Jehangir Khan	Battagram	BA/B.Ed	10/02/1988	17/9/1988	04/11/1969	10/02/1988	02/11/1988 ✓
169	GPS	Bartamori	Ghulam Akbar	Muqtadir	Battagram	FA/CT	10/03/1988	17/9/1988	15/11/1967	10/03/1988	
170	MOS	Kark Chbiyar	Muhammad Rahim	Afsar Khan	Battagram	FA/CT	10/03/1988	17/9/1988	03/10/1968	10/03/1988	
171	GPS	d/muzamil shah	Syed Hassan Shah	Ghulam Nabi	Battagram	BA/B.Ed	10/03/1988	17/9/1988	01/10/1969	10/03/1988	03/10/1988
172	GPS	Kassai Tandool	Muhammad Javed	Sarzen Jan	Battagram	BA/B.Ed	10/03/1988	17/9/1988	04/01/1969	10/03/1988	03/10/1988
173	GPS	Kareen Sekargah	Muhammad Javed	Muhammad Tayyeb	Battagram	FA/CT	10/03/1988	17/9/1988	05/08/1969	10/03/1988	
174	GPS	Matta Mansoor	Fazal Wahab	Ghulam Umar	Battagram	FA/CT	10/04/1988	17/9/1988	01/01/1969	10/04/1988	
175	MOS	Kargari	Koor Nabi Shah	Ghulam Jan	Battagram	FA	21/11/1988	26/8/1989	01/02/1968	21/11/1988	
176	GPS	Sheshal	Ghulam Yousaf	Ghulam Muhammad	Battagram	FA/CT	13/4/1981	31/1/1989	04/12/1963	31/1/1989	
177	GPS	Biani	Umar Jan	Pamjan	Battagram	FA/CT	10/11/1988	26/8/1989	13/6/1962	26/8/1989	
178	GPS	Nehar Bala	Safiulla	Redulla	Battagram	FA	10/12/1988	26/8/1989	12/06/1964	26/8/1989	
179	GPS	Kiari	Bukhtier Khan	Abdul Razzaq	Battagram	FA	10/10/1988	26/8/1989	02/04/1966	26/8/1989	
180	GPS	Dabri Kandow	Alomgir Khan	Jamal Khan	Battagram	FA	15/10/1988	26/8/1989	03/10/1967	26/8/1989	
181	GPS	Chanj Mar	Muhammad Fareed	Muhammad Wahab	Battagram	FA	10/11/1988	26/8/1989	16/10/1967	26/8/1989	
182	GPS	D Chanjil	Muhraj	Imran	Battagram	FA	23/11/1988	26/8/1989	14/11/1964	26/8/1989	
183	MOS	Shuagri	Inayatul Haq	Sultan Akbar	Battagram	FA/CT	10/11/1988	26/8/1989	04/08/1963	26/8/1989	
184	GPS	Gidri Tali mohd khan	Abdul Qadir	Bahadar khan	Battagram	FA	23/11/1988	26/8/1989	25/5/1968	26/8/1989	
185	GPS	Shad Bagh	S.Near Nabi Shah	Azmat Shah	Battagram	BA/BEd	10/11/1988	26/8/1989	20/03/1970	26/8/1989	
186	GPS	Ali Sheria	Shah Abdul Aziz	Mir Azam Shah	Battagram	BA/CT/BEd	22/11/1988	26/8/1989	12/01/1970	26/8/1989	
187	GPS	Laghi Karin	Akhtar Murir	Syyed Zojan	Battagram	BA/CT/BEd	22/11/1988	26/8/1989	12/01/1970	26/8/1989	

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188	GPS	Drtab Qala	Abdul Ghafor	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 Haider	Battagram	MA/B.Ed	26/3/1990	17/1/1990 ✓	01/01/1969	26/3/1990 ✓	
196	GPS	Bajri	Muhammad Nawaz	Alzemullah	Battagram	FA	26/3/1990	17/1/1990	01/02/1969	26/3/1990	
197	GPS	Chari Bala	Waris khan	Essa khan	Battagram	BA	26/3/1990	17/1/1990	02/09/1969	26/3/1990	
198	GPS	Sandary Kakarshang	Ajab Khan	Sher Muhammad	Battagram	F.Sc	26/3/1990	01/01/1990	03/10/1969	26/3/1990	
199	GPS	Dabaona	Abdur Razzag	Said Faqir	Battagram	FA	26/3/1990	01/01/1990	14/5/1969	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	G/Rsool Khan	Bakhtiar	Roshan Khan	Battagram	FA	26/3/1990	01/01/1990	04/01/1971	26/3/1990	
202	GPS	Landi nonvan 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	Phagara	Asdul Naszer	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>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	Miang Khan	Battagram	FA	16/4/1990	20/1/1990	05/04/1962	16/4/1990	
209	GPS	Karsu Pashto	Yusaf Khan	Hatem 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 Hural	Alam Zab	Ghulam Haider	Battagram	FA	16/4/1990	17/1/1989	02/12/1970	16/4/1990	
212	GPS	Gorong	Sakht Nawaz	Shirdad	Battagram	FA	16/4/1990	01/01/1990	04/03/1971	16/4/1990	
213	GPS	Barkul Sarhad	Muhammad Sardar	Pir Muhammad	Battagram	BA/CT	04/02/1966	14/11/1990	27/10/1958	14/11/1990	
214	GPS	Shurty	Muhammad Salim	Bahadar Khan	Battagram	FA	06/03/1984	14/11/1990	04/12/1959	14/11/1990	
215	GPS	Ajunara	Muhammad Ayyub	Ahmad Jan	Battagram	B/A	05/05/1985	14/11/1990	15/4/1962	14/11/1990	
216	GPS	Nara Para	Gul Zarin	Said Qahar	Battagram	BA/CT	10/11/1988	14/11/1990	05/02/1964	14/11/1990	
217	GPS	Para Hural	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	Sichhara	Muhammad Yousof	Abdul Rahman	Battagram	BA/B.Ed	05/08/1986	14/11/1990	15/8/1965	14/11/1990	
220	GPS	Barkul	Muhammad Azhar	Sardar Khan	Battagram	BA/CT/54	04/03/1985	14/11/1990	10/04/1966	14/11/1990	
221	GPS	Safroona	Muhammad Yousof	Ali Akbar	Battagram	FA/CT	04/08/1986	14/11/1990	15/4/1966	14/11/1990	
222	GPS	...	...	...	Battagram	BA	10/11/1988	14/11/1990	15/8/1965	14/11/1990	
223	GPS	Musani	Tahal Khan	Abdul Satar	Battagram	FA/CT	15/3/1985	14/11/1990	04/01/1967	14/11/1990	
224	GPS	Barkul	Muhammad Amir	Muhammad Kabzar	Battagram	MA/CT	03/12/1986	14/11/1990	07/03/1966	14/11/1990	
225	GPS	Bal angah	Dost Muhammad	Sher Muhammad	Battagram	BA/CT	10/12/1988	14/11/1990	03/03/1968	14/11/1990	
226	GPS	Pirkari	Said Ashraf Shah	Muhammad Inshad	Battagram	FA/CT	21/11/1983	14/11/1990	05/10/1958	14/11/1990	

227	GPS	Barsakarga	Gul Bashir	Shazada Khan	Battagram	BA	21/11/1988	14/11/1990	06/06/1968	14/11/1990
228	GPS	Drab Qala	Abdur Rehman	Abdur Rahman	Battagram	FA	26/11/1988	14/11/1990	04/01/1969	14/11/1990
229	GPS	Noshara	Safa Gul	Qadar Gaji	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	Amlook 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	Wasal Khan	Battagram	FA	16/12/1990	14/11/1990	02/01/1969	16/12/1990
235	GPS	Bilyani	Fozal Hadi	Muhammad Nazem	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	Kashgram	Ubaidullah	Muzafar Khan	Battagram	BA/CT	31/3/1988	16/3/1991	25/12/1967	16/3/1991
238	GPS	Rupkani	Zahir Muhammad	Srijawal 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 Sakarge	Siafur Rehman	Noor Mail	Battagram	FA	05/04/1986	22/10/1991	18/2/1963	22/10/1991
242	GPS	Tummai	Faiz 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	Mawab 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	01/05/1966	22/10/1991
245	GPS	Gantar	Shafiqul Haq	Saeedul Haq	Battagram	FA	24/6/1987	22/10/1991	02/02/1966	22/10/1991
246	GPS	G/Battagram	Muhammad Nawaz Khan	Hakim Khan	Battagram	FA	05/05/1986	22/10/1991	04/02/1966	22/10/1991
247	GPS	Muro	Aminul Haq	Siaful Haq	Battagram	BA	25/11/1935	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	Barmorin	Sabz Ali	Muhammad Haroon	Battagram	FA	10/11/1988	22/10/1991	02/12/1969	22/10/1991
251	GPS	Hatal Batkul	Abdullah Jan	Azizur Rehman	Battagram	FA	09/10/1987	22/10/1991	08/08/1969	22/10/1991
252	GPS	Bar Tandool	Jamroz Khan	Rajwali	Battagram	FA/CT	04/10/1985	22/10/1991	15/10/1969	22/10/1991
253	GPS	Dari Muhammad Shah	Kifayatullah	Sharif Khan	Battagram	BA/B.Ed	02/06/1986	22/10/1991	30/10/1968	22/10/1991
254	GPS	Reshang	Muhammad Rahman	Attaur Rehman	Battagram	BA/CT	22/3/1992	22/10/1991	15/1/1973	22/3/1992
255	GPS	Gari Kandeqir	Muhammad Razaq Sheli	Said Mahmood	Battagram	MA/M.Ed	25/3/1992	01/01/1991	5/1/1969	25/3/1992
256	GPS	Gorati	Muhammad Ismail	Umar Zarin	Battagram	BA	25/3/1992	22/10/1991	04/04/1969	25/3/1992
257	GPS	Robat	Muhammad Rehim	Sarakati Khan	Battagram	FA	25/3/1992	22/10/1991	06/05/1969	25/3/1992
258	GPS	Mangana bela	Hayyullah	Ahmad Saif	Battagram	BA	25/3/1992	22/10/1991	09/02/1970	25/3/1992
259	GPS	Balla Balat Khan	Muhammad Elias	Muhammad Ayyub	Battagram	BA	25/3/1992	22/10/1991	22/12/1970	25/3/1992
260	GPS	Shaktar	Fazul Karim	Kashkel	Battagram	FA	25/3/1992	22/10/1991	01/01/1972	25/3/1992
261	GPS	Shah Jangat	Muhammad Bashir	Fazul Karim	Battagram	BA	25/3/1992	22/10/1991	01/01/1972	25/3/1992
262	GPS	Sakargah	Fazul Malik	Kashkel	Battagram	BA	25/3/1992	22/10/1991	03/03/1970	25/3/1992
263	GPS	Kalota	Muhammad Yousaf	Jama Khan	Battagram	BA	25/3/1992	22/10/1991	05/07/1970	25/3/1992
264	GPS	Kaz Cheren	Muhammad Reuf	Abdul Qayyum	Battagram	BA/CT	25/3/1992	22/10/1991	21/03/1971	25/3/1992
265	GPS	Kandara	Nawab	Daood Khan	Battagram	FA	25/3/1992	22/10/1991	03/01/1971	25/3/1992



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

Service Appeal No. 682/2015

Muhammad Razaq Shah

**VERSUS**

Govt. of KPK & others.

**SERVICE APPEAL**

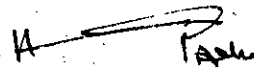
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<i>S.#</i>	<i>Description</i>	<i>Page No.</i>	<i>Annexure</i>
1.	Rejoinder Reply -	1 to 5	
2.	Copy of recommendation	6-15	"A"
3.	Wakalatnama.		

...RESPONDENT NO. 4 TO 9

Through

Dated: 19-5 /2016



(HAMAYUN KHAN)

Advocate High Court, Abbottabad

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

Service Appeal No. 682/2015

Muhammad Razaq Shah

**VERSUS**

Govt. of KPK & others.

**SERVICE APPEAL**

**REPLY/COMMENTS ON BEHALF OF RESPONDENT NO. 4 TO 9**

Respectfully Sheweth;-

**PRELIMINARY OBJECTIONS;**

1. That the appellant has got no cause of action to file the present appeal before this Honourable Court.
2. That appellant stopped to bring present appeal by his own conduct.
3. That the appellant has not come to this Honourable Court with clean hand.

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

**REPLY OF 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 respondent No. 4 to 9 and promotion order was issued as per seniority list dated 31/12/2012 appellant placed at serial No. 255 and respondent placed as under;-

- a. Nazir Muhammad Serial NO. 22.
- b. Tawab Said serial No. 75.
- c. Shad Muhammad Khan serial No. 129.
- d. Muhammad Khursheed serial No. 131.
- e. Bahadar Sher serial No. 163
- f. 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. Copy of recommendation is annexed as Annexure "A".

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

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

**REPLY OF GROUNDS:-**

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

b. That in reply of para "b" of the appeal appellant was junior and his name placed in serial No. 255, therefore, respondent No. 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 respondent No. 1 to 3 after completion of all legal and codal formalities then issued promotion order dated 28/10/2014 and appellant did not file till date any appeal against seniority list dated 31/12/2012 issued by respondents, hence para "d" is incorrect.

e. Para "e" needs no comments.

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

...RESPONDENT NO. 4 TO 9

Through

Dated: 4-5 /2016



(HAMAYUN KHAN)

Advocate High Court, Abbottabad

**VERIFICATION: -**

Verified on oath that the contents of forgoing rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



...RESPONDENT NO. 4 TO 9

Amraewe "A" 6

Battagram SST (Male) 18.08.2014 1



**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 PAKHTUN KHWA 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, STI/TT, SQari/Qari, PSHI/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:

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

**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:-

Total No. of SST BIO-CHEM (M) Posts vacant Posts	27
25% share initial recruitment	6
75% share for Promotion.	21
40 % Share of promotion of SCT/CT	11
Posts available for promotion	11
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 CT	Qualification		Remarks
						Acd	Prof	
No Eligible Candidate is available								

**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:-

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

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	
No Eligible Candidate is available								

**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:-

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 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 SDM/DM	Qualification		Remarks
						Acd	Prof	
No Eligible Candidate is available								

**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:-

Total No. of SST Bio-Chem (M) Posts vacant Posts	55
--	----



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
						Acd	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
						Acd	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

SN0	S.LN o	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular Qari	Qualification		Remarks
						Acd	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	86
25% share initial recruitment	7
75% share for Promotion.	19
40 % Share of promotion of SCT/CT	10
Posts available for promotion	10

<b>Proposed for Promotion</b>	04
<b>Recommended for promotion</b>	03

S. No	S.L. No	Name of Official	Father Name	Date of Birth	Date of appointment as regular CT	Qualification		Remarks
						Acad	Prof	
1	47	Mian Gul	GHS Jambora	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:-

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

S. No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular PST	Qualification		Remarks
						Acad	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:-

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

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

7  
10  
/0

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
						Acd	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
						Acd	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
					Acd	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
					Acd	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.
	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.
	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.
1	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**

18	45	Noor Muhammad	G.Jica Modle School Pora Bala	1/1/1969	12/15/1990	BA	B.Ed	SST General (BPS-16) on regular basis with immediate effect. 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:-

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
Proposed for Promotion	11
Recommended for promotion	11

S.L. No	Name of Official	Present Place of Posting	Date of Birth	Date of appointment for regular basis	Qualification		Remarks
					Acad	Prof	
11	Arsala Khan	GPS Nathu	9/9/1959	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

3	22	Nazeer Muhammad	GPS Bakro Dab	10/6/1966	1/8/1985	BA	B.Ed	General (BPS-16) on regular basis with immediate effect. 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

<b>Posts available for promotion</b>	
<b>Proposed for Promotion</b>	<b>02</b>
<b>Recommended for promotion</b>	<b>02</b>

S.L. No	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular SAT/AT	Qualification		Remarks
					Acd	Prof	
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.
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:-

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

S.L. No	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular STI/TT	Qualification		Remarks
					Acd	Prof	
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.
32	Muhammad Rafiq	GIS 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

**EM 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:-

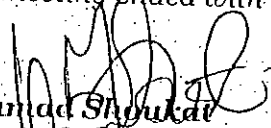
<b>Total No. of SST General (M) Posts vacant Posts</b>	<b>48</b>
<b>25% share initial recruitment</b>	<b>7</b>
<b>75% share for Promotion.</b>	<b>41</b>
<b>3 % Share of promotion of S Qari/Qari</b>	<b>02</b>
<b>Posts available for promotion</b>	<b>02</b>
<b>Proposed for Promotion</b>	<b>02</b>
<b>Recommended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

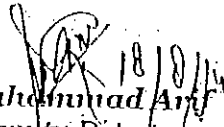
S.L. No	Name of Official	Present Place of Posting	Date of Birth	Date of appointment as regular Qari	Qualification		Remarks
					Acd	Prof	
22	Ikrumullah	GHS Chappargram	5/4/1972	3/1/2000	MA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.

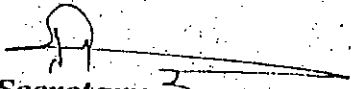
2	23	Rangaiz Khan	GHS Banna Allai	12/12/1975	3/1/2000	BA	B.Ed	Considered suitable for promotion to the post of SST General (BPS-16) on regular basis with immediate effect.
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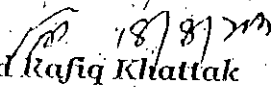
Number of Male S Qari/Qari cleared for promotion = 02

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

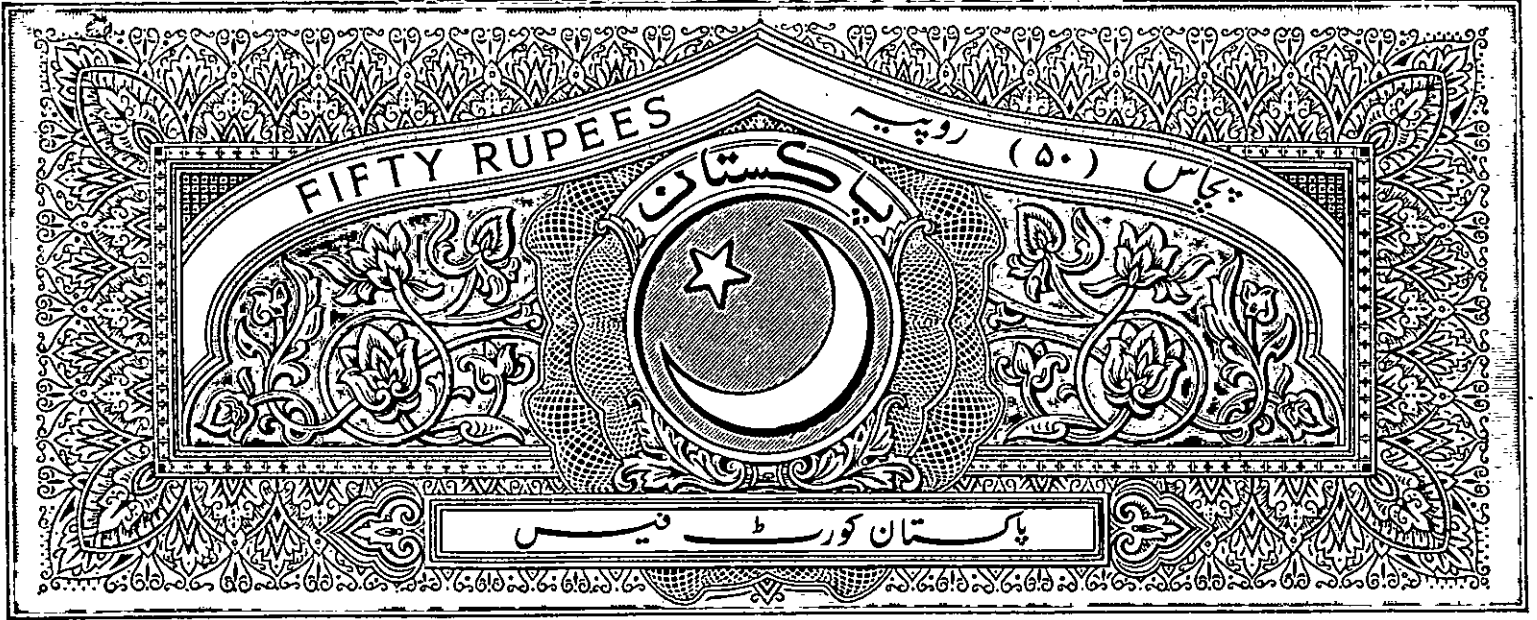
  
**Muhammad Shoukat**  
 District Education Officer  
 (Male) Battagram

  
**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





لیدنت قیام کراچی لکھنؤ ٹریبیونل ٹیمپل کورٹ اسٹریٹ ہاؤس

اپریل بری 683/15



محمد رزاق نام گوانٹ کراچی اور علیہ

سروس اپیل

بیان صلح

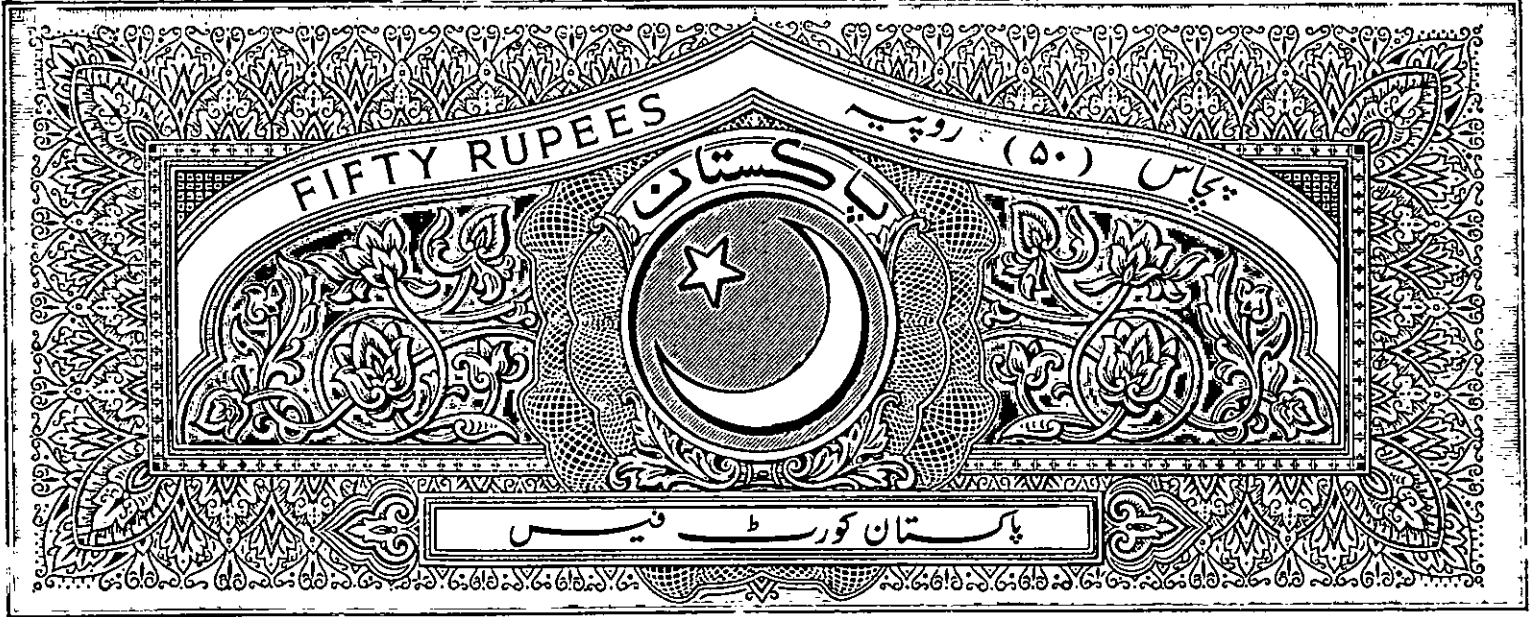
1 میں مسٹی ٹیپر محمد آرسٹ No 4/557 نے ل BE مورخ 04/13 کو یا س کیا ہے

2 میں مسٹی ٹیپر محمد آرسٹ No 5/557 نے ل BE مورخ 14/4 کو یا س کیا ہے

3 محمد ٹیپر آرسٹ No 7/557 نے ل BE مورخ 26/12 کو یا س کیا ہے

4 بیار سید آرسٹ No 8/557 نے ل BE مورخ 26/12 کو یا س کیا ہے

5 مسٹی ٹیپر آرسٹ No 9/557 نے ل BE مورخ 4/13 کو یا س کیا ہے



عم صیوانی لانے ایسے نام مذکورہ بالا دستاویزات  
 بوقت Promotion Paper کے تیار کرنے وقت  
 دفتر DEO میل بیگرام میں جمع کیے جانیے۔ حلف بیان  
 لکھ کر دینے چاہیں تاکہ اگر مذکورہ بالا بیان ملنے میں کسی  
 امر کو مخفی رہے نہ رکھا جائے۔ اگر کسی قسم کا جھوٹ  
 فراڈ ثابت ہو جائے تو اس کے نتائج کا ذمہ دار  
 ہوں گا۔

المقوم ۱۹/۲/۱۸



نوٹس

① نئی نئی

دکھ

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محمد حنیس  
 13202-0737211-9

عبدالرشید  
 13201-6884837-5