

24.01.2023

Proper D.B is not available, therefore the case is  
adjourned to 24.03.2023 for the same as before.

Reader

24.03.2023

Clerk of learned counsel for the appellant present. Mr. Muhammad Tufail, Assistant alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present and produced record mentioned in order sheet dated 22.12.2022, which is placed on file.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 06.06.2023 before the D.B. Parcha Peshi given to the parties.

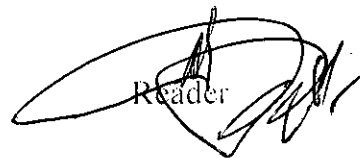
(Muhammad Akbar Khan)  
Member (E)

(Salah-ud-Din)  
Member (J)

SCANNED  
10/3/23  
Peshawar

09.11.2022

Since 9<sup>th</sup> November has been declared as public holiday, therefore, case is adjourned to 22.12.2022 for the same as before.

  
Reader


22.12.2022


Counsel for the appellant present.

Muhammad Adeel Butt learned Additional Advocate General for respondents present.

Case was fixed for arguments, therefore, attention of this tribunal was brought to order sheets dated 09.3.2020, 30.07.2021 and 26.10.2021 vide which respondents had been directed to produce the record regarding the merit list of appointment of SET dated 24.07.2003 and corrigendum dated 29.09.2003. Despite direction Director Elementary & Secondary Education Khyber Pakhtunkhwa failed to attend tribunal alongwith record, therefore, learned AAG is directed to make sure personal appearance of Director Elementary & Secondary Education Khyber Pakhtunkhwa alongwith record failing which strict legal action would be taken against all concerned. Copy of this order sheet be served upon learned AAG (Muhammad Adeel Butt) and Director Elementary & Secondary Education Khyber Pakhtunkhwa for further necessary action at their end. To come up for arguments on 24.01.2023 before D.B.

**SCANNED**  
**KPST**  
**Peshawar**

  
(Fareeha Paul)  
Member (E)

  
(Rozina Rehman)  
Member (J)

DIRECTORATE OF SCHOOLS & LITERACY NWFP PESHAWAR

ANNEX "A"

NUMBER

Consequent upon recommendation/selection by the Departmental Selection Committee, the Director Schools & Literacy NWFP Peshawar has been pleased to appoint the following S.E.Ts (General/Male) in BPS-16 on Regular Basis. (Rs.3805-295-12655) plus usual allowances as admissible under the rules and posted in the schools as noted against their names with effect from 01.09.2003 subject to the terms and conditions mentioned below: -

Zone II General (Male)

S.No.	Name/Father Name	Father's Name	Address	Domicile	Place of Posting	Remarks
1	Iliaz Muhammad	Abdur Rouf	CT GHS Turnab Form	Peshawar	GHS Maingo Peshawar	Against V/Post
2	Shirshar Ali	Wahdat Khan	CTOMS Ajoon Killi	Charsadda	GHS Zarinabad Chd	Against V/Post
3	Muzbar Ali	Abdul Bilg	CT GHS Sheikhdara Pesh	Peshawar	GMS Mushterza Peshawar	Against V/Post
4	Safaid Shah	Wasif Shah	CT. GHS Qar Muzara	Swabi	GHS Qar Muzara Swabi	Against V/Post
5	Muhammad Tayab	Abdur Rouf	CT GHS Shingai K. Agency	Charsadda	GHS Kalozai Chd	Against V/Post
6	Noor ul Haq	Samarqand	CT. GHS Dagn	Swabi	GHS Kaku Khan Swabi	Against V/Post
7	Muhammad Sber	Zaheer	CT. GHS Marghuz	Swabi	GHS Marghuz Swabi	Against V/Post
8	Raza Khan	Qazi Rehman	CT GHS Chagar Matti	Charsadda	GMS G/Chandan Bala pesh	Against V/Post
9	Ghulam Ali	Fazli Deyou	PTC GFS Serai Korom	Mardan	GHS Barhigara Mardan	Against V/Post
10	Shahid ul Din	M. Naveed Din	AT GHS Anba Dher	Charsadda	GHS Khawaja Kinwas Chd.	Against V/Post
11	Muhammad Rehman	Maskeen Khan	CT. GHS Munk	Swabi	GHS Munk Swabi	Against V/Post
12	S. Jafarullah	S. Gul Badshah	PTC GFS Turnab	Charsadda	GHS Adizai Pesh	Against V/Post
13	S. Nisar Jamal	S. Muzfar Shah	SET GHS Pir Pal NSR	Nowshera	GHS Pir Pal Nowshera	Already occupied
14	Abdul Jabbar	Muhammadullah	PTC GFS Kotac	Charsadda	GHS Dag Pesh	Against V/Post
15	Abdul Abrar	Abdul Khaliq	CT GHS Ghari Kopara	Mardan	GHS Chakpara Mardan	Against V/Post
16	Muhammad Ayub	Muhammad Yaqub Khan	CT GHS Taltai Pesh	Peshawar	GHS Pishindara Bala Pesh	Against V/Post
17	Hameed Khan	Najeeb Khan	CT Jica M/S Mushoo Khel	Peshawar	GHS Mushoo Khel Peshawar	Against V/Post
18	Iliaz Ullah	Saeedullah	CT. GHS Topi	Swabi	GHS Topi Swabi	Against V/Post
19	Ahmad Khan	Majroob Khan	DM OMS Qanla	Mardan	GHS Shawa Baida Mardan	Against V/Post
20	Shahjehan	Hameed Din	PTC. OPS No. 2 Rikhan	Swabi	GMS Sher Qand Swabi	Against V/Post
21	Niaz Muhammad	Zahir Muhammad	PTC OPS Kura Pur	Mardan	GMS Manga Mardan	Against V/Post
22	Hajir Rehman	Gulab Khan	PTC GFS Umar Bala	Peshawar	GMS Kothi Kharid Nowshera	Against V/Post
23	Badr Shah Khan	H. Rabin Gul	CT GHS Hoti Landold	Mardan	GHS Jamal garhi Mardan	Against V/Post
24	Sanjiv Kumar	Mehrab Khan	CT. GHS Kohi Barmol	Mardan	GHS Kohi Barmol Mardan	Against V/Post
25	Diaz Muhammad	Inayat Khan	CT. GHS No. 1 Yar Hussain	Swabi	GHS No. 1 Yar Hussain Swabi	Against V/Post
26	Jabar ul Haq	Sultan Shah	CT. GHS No. 1 Yar Hussain	Swabi	GHS Tor Dher Swabi	Against V/Post
27	Ghulam Ali	Ghulam Rehman	CT GHS Sher Pao	Charsadda	GHS Sherdara Pesh	Against V/Post
28	Shah Muhammad	All Dohadar	PTC GFS Paltai Baida	Swabi	GHS Tot Dher Swabi	Against V/Post
29	Anwar ul Haq	Iliaz ul Haq	CT. GHS Yaqoobi	Swabi	GHS Jehangira Swabi	Against V/Post
30	Mauzer Ul Haq	Israr ul Haq	CT GHS Julala	Mardan	GHS Quzi Abad Mardan	Against V/Post
31	Ajmal Khan	Lynos Khan	CT. GHS Qar Muzara	Swabi	GMS Allah Dher Swabi	Against V/Post
32	Badr Muhammad	Qad Muhammad	PTC-OPS Shah Dhand	MDN	GHS Charitar Swabi	Against V/Post
33	Jamil Khan	Abdul Sattar	GFS Moh: Islamabad	Peshawar	GHS Dag Pesh	Against V/Post
34	Muhammad Shah	Rehman Shah	AT OMS Kandar	MDN	GHS Barhigara Mardan	Against V/Post
35	Juz Muhammad	Khawaja Mullah	CT. GHS Tundohi	Swabi	GMS Tund Kohi Swabi	Against V/Post
36	Iliaz Qadir	Fazli Qadir	CT. GH. Kala Het	Swabi	GHS Kotha Swabi	Against V/Post
37	Farhad Gul	Muhammad Gul	PTC OPS Miran Esso	Nowshera	GHS Jehangira NSR	Against V/Post
38	Amal Ullah	Shokirullah	PTC GFS Jungara	MDN	GMS Gadder Mardan	Against V/Post
39	Shahzad Khan	Asmatullah	CT. GHS Bazar	Swabi	GHS Bazar Swabi	Against V/Post
40	Wali Ullah	Habibullah	PTC. OPS No. 1 Malary	Swabi	GHS Malaini Swabi	Against V/Post
41	Hami Khan	Muzar Khan	CT. GHS K.S. Killi	Swabi	GHS Qajal Swabi	Against V/Post
42	Asif Ali Shah	Masom Shah	CT. GHS Kharai	Nowshera	GHS Khanwarol Nowshera	Against V/Post
43	Muhammad Zaman	Muhammad Hameed	CT. GHS Kharai	MDN	GHS Bahadar Khan Kote Md	Against V/Post
44	Fazal Muhammad	Hallu Shah	CT. GHS J. Anar Dheri	Swabi	GHS Salim Khan No. 1 Mrd.	Against V/Post

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5	Fazal Roldan	Nasir Khan	CT GMS Murgu	MDN	GMS Solani Mardun	Against V/Post
6	Sirajul Haq	Huwar Khan	CTGMS Cheema	Charsadda	GHS Khasligi Payan NSR	Against V/Post
7	Afreen Khum	Sherin Khum	CT.GHS Bam Khel	Swabi	GHS Qajal Swabi	Against V/Post
8	Sabz Ali Khan	Sharif Khan	PTC GPS Guj Mandi	Peshawar	GHS Mera Unnor Payan Pesh	Against V/Post
9	Rahim Khan	Yaqub Khan	CT GHS No.3 Mardun	MDN	GHS Chapura Mardun	Against V/Post
10	Shoukat Ali	Faqir Muahd Khan	PTC GPS Ganda	Charsadda	GHS Mali Khel Nowshera	Against V/Post
11	Liaqat Ali	Alber Ali	GPS Yeasaf Khan Killi Tangi	Charsadda	GHS Regi Pesh	Against V/Post
12	Fazal Robbin	Abdul Qadir	CT.GHSS Khair Abad	Swabi	GHSS Khairabad Nowshera	Against V/Post
13	Fazal Ghani	Fazal Robbi	CT.GMS Kalan	Swabi	GHS Qudra Swabi	Against V/Post
14	Ishtiaq Din	Ashrafud Din	CT GHS Aman Goch	Nowshera	GHS Aman Goch NSR	Against V/Post
15	Abdul Malic	Sunnar Qasbi	CT.GHS Pabani	Swabi	GHS Pabani Swabi	Against V/Post
16	Mahar Khan	Janus Khan	CT.GMS Ahmad Khan	Swabi	GHS Hanyan Swabi	Against V/Post
17	Adil Sher	Mid Dad Khan	PTC.GPS Behal	Swabi	GMS Chaitral Swabi	Against V/Post
18	Muhammad Sheef	Musa Muhammad	CT GMS Muzakano	Peshawar	GMS Mattara Pesh	Against V/Post
19	Fazli Rabbi	Fazli Iqbal	CTGMS Mera	Charsadda	GHS No.1 NSR Kalan	Against V/Post
20	Noor ul Amin	Rohat Amin	CT.GHS Kundu	Swabi	GHS Deeka Swabi	Against V/Post
21	Ferman Ali	Anur Zada	CT.GHS Kotti (Saleh Khan)	Nowshera	GHS Kotti Nowshera	Against V/Post
22	Fazli Iqbal	H. Ghulam Muhammad	PTC GPS Bakhtkhali	MDN	GHS Maqbi Mardun	Against V/Post
23	Afsar Ali	Abdul Khaliq	PTC GPS Kot Ismail Zal	MDN	GHS Babozal Swabi	Against V/Post
24	Sahibzada Tariq Mehmood	Mehmood Hassan Akhtar	CT GHS No 2 City	Peshawar	GHS Kaga Wala Pesh	Against V/Post
25	Yar Muhammad	Muhammad Aslam Khan	PTC GPS Qazi Saral	Charsadda	GHS Mattani Pesh	Against V/Post
26	Dr Soz Muhammad	Sachand	CT GHS Qanbat	MDN	GHS Khairabad NSR	Against V/Post
27	Jaffer Khan	Muhammad Zarif	DM GMS Tolatal Payan	Peshawar	GHS Pishinkhura Bada Pesh	Against V/Post
28	Husein Ullah Jua	Abdul Shafi	PTC GPS Doolal Para	Charsadda	GHS Sheikhan Para	Against V/Post
29	Sher Afzal Khan	Sher Hassan Khan	CT.GHS Khawar	Nowshera	GHS Khawar Nowshera	Against V/Post
30	Hassan Gul	Liban Gul	CT GHSS No 1 Pesh City	Nowshera	GMS Wazir Gochi NSR	Against V/Post
31	Zahid Abideen	Mir Qasim	CT.GHS No 1 Suljan Khan	Swabi	GHS Qudra Swabi	Against V/Post
32	Fazli Wahab	Fazli Mehmood	PTC GPS Tankhuzai	Charsadda	GHS No.1 NSR Kalan	Against V/Post
33	Muhammad Nawaz	Muhammad Nazar	PTC GPS Dukki	Charsadda	GHS Kofoor Dheri Pesh	Against V/Post
34	Mudaliar Sarwar	Muhammad Sarwar	CT.GMS Gali Dheri	Swabi	GHS Beeka Swabi	Against V/Post
35	Misal Khan	Nasir Khan	CT GHS Khairat	Charsadda	GMS Dheri Kati Khel NSR	Against V/Post
36	Muhammad Israr	Pir Muhammad	CT GMS Char Gali	MDN	GHS Beleran Kati NSR	Against V/Post
37	Muhammad Yousof	Muhammad Nazir	PTC GPS No.1 Baghalada	MDN	GHS P. Kati Khel NSR	Against V/Post
38	Alamul Saloni	Fazal Ghani	CT GHSS Doshera	Charsadda	GHS H M Noor Kati Pesh	Against V/Post
39	Rosh ul Amin	Alamgir	CT.GHS No.1 Yar Hussain	Swabi	GHS Sarandor, Gochi NSR	Against V/Post
40	Kaplan Ullah	Noorjilani	PTC.GPS No.2 Sur Dheri	Swabi	GHS Shaita Nowshera	Against V/Post
41	Fajbar Khan	Sharifullah	CT GHSS Kulrang	MDN	GHS Shaita Nowshera	Against V/Post
42	M. Idrees	Abdul Sattar	CT GHS No 1 Charsadda	Charsadda	GHS Mula Kati NSR	Against V/Post
43	Muhammad Amra	Anir Muhammad	CT GHSS Mayra	MDN	GHS Bara Banda NSR	Against V/Post
44	Altaf Rehman	Abdul Ghaffar Khan	CT.GMS Zaida	Swabi	GHS Pir Subaq NSR	Against V/Post
45	Muhammad Nadeem	Muhammad Hassan	CT GHSS Mardun	MDN	GHS Bara Banda NSR	Against V/Post
46	Sher Azam Khan	Lal Babadar	CT.GHS Mand	Swabi	GHS Jobbi NSR	Against V/Post
47	Manzoor Ahmad	Awal Mir	CT GHSS Chari Kapora	MDN	GHS Mohib Banda NSR	Against V/Post
48	Imyat Ali	Sher Badshah	CT.GMS Banni	Swabi	GHS Marhatl Banda NSR	Against V/Post
49	Ferman Ali	Awal Din	CT.GHS K.S. Kili	Swabi	GHS No.1 NSR Cantl	Against V/Post
50	Qul Razaq	Abdul Razaq	PTC GPS No 2 Tangi	Charsadda	GHS Badezat Pesh	Against V/Post
51	Javed Iqbal	Shada Muhammad	CT GHS Tori	MDN	GHS Mughalla NSR	Against V/Post
52	Liaq Zaman	Ghulam Rehman	PTC.GPS Khobil	Swabi	GHS Jabbi Nowshera	Against V/Post
53	Fazli Rana	Sattar Rehman	CT GHS Mazdoor Abad	MDN	GHS Beleran Kati NSR	Against V/Post
54	Sibghat Ullah	Wasiullah	CT GHSS Shah Raz Ghari	MDN	GHSS Z K K S. Sub NSR	Against V/Post
55	Mushaq Ali	Abdul Jamil	CT.GMS Gehar Abad	Swabi	GHS Jobbi NSR	Against V/Post

No.	Band Ullah	Saudat/Ink	GHS Pukda Chulani	Charsadda	GHS Pukda Chulani Pesh	Against V/Po
97	Asad Jan	Ghulam Haqqani	CT GHS Suwayya	MDN	GHS Aman Garh NSR	Against V/Po
98	Farran Ullah	Kujer Gul	CT GHS Lard Khawar	MDN	GHSS Z K K Sahib NSR	Against V/Po
99	Shahen Shah	Sharzada	CT GHS No 1 Charsadda	Charsadda	GHS No.1 Charsadda	Against V/Po
100	Ebnr Ahmad	basfir Ahmad	CT GHS Tara	MDN	GHSS Z K K Sahib NSR	Against V/Po
101	Inayat Karim	S. Abdur Rehman	CT GHS Labour Colony	MDN	GHS Labour Colony Mardan	Against V/Po
102	Niaz Badshah	Khan Badshah	CT GHS Mian Essa	Charsadda	GHS Maslio Cagar Pesh	Against V/Po
103	Nabi ur Rehman	Abdullah Khan	CT GHS Kati Chari	MDN	GHS Kati Chari Mardan	Against V/Po
104	Mohammad Tariq	S. Behawal Shah	PTC. GHS No. 2 Zaida	Swabi	GHS Marbat Buzda NSR	Against V/Po
105	Abdul Aziz	Abdul Tanid	CT GHS Gujrat	MDN	GHS Gujrat Mardan	Against V/Po
106	Aujaz Khan	Khan Babocher	CT GHS Khatir Abad	MDN	GHS P. Kati Khel NSR	Against V/Po
107	Iqbal Ali Shah	Sajawal Shah	CT. GHS No. 1 Yur Musrain	Swabi	GHSS Nizampur NSR	Against V/Po
108	Raza Muhammad	Taj Muhammad	CT. GHS. K.S. Kili	Swabi	GMS Sher Ghund Swabi	Against V/Po
109	Fida Muhammad	Khan Muhammad	GHS Zahir Abad	Peshawar	GHS G/Ghulam Shah Pesh	Against V/Po
110	Mohammad Younis	Abdullah Jan	DM GHS Umar Miana	Peshawar	GHS Umar Miana Pesh	Against V/Po
111	Gel Rehman	Jan Muhammad	CT GHS Shaghali Payan	Peshawar	GHS Shaghali Payan Pesh	Against V/Po
112	Sana Ullah	Abdul Baqi	CT GHS Gumbat	MDN	GHS Khesari NSR	Against V/Po
113	Saiful Islam	Abdul Karim	CT GMS Chula	MDN	GHS Zara Miana NSR	Against V/Po
114	Mohammad Ishaq	Mohammad Haroon	CT GMS Hoti Landoli	MDN	GHS Aza Khol Bala NSR	Against V/Po
115	Jamil Ahmad	Momen Khan	PTC GHS Mazra	Charsadda	GHS Surezal Bala Pesh	Against V/Po
116	Sher Zameen Khan	Wasil Khan	PTC. GSP Marghuz	Swabi	GHSS Nizampur NSR	Against V/Po
117	Jehanzeb Khan	Feroz Khan	CT GHS Rengi	Peshawar	GHS Lakoral Khatla Pesh	Against V/Po
118	Qazi Hussain Ahmed	Q. Habibur Rehman	CT. GHS Mugmiki	Nowshera	GHSS Akora Khattak Nowshera	Against V/Po
119	Zulfiqar Ali	Shahzada	CT. GHS Khesghi Bala	Nowshera	GHS Khesghi Bala NSR	Against V/Po
120	Niaz Muhammad	Ameer Muhammad	CT. GHS Dugal	Swabi	GHS Adanzai NSR	Against V/Po
121	Syed Gulnaz Sakh	S. Rehman Shah	CT GHS Aza Khol Matani	Peshawar	GHS Aza Khol Matani Pesh	Against V/Po
122	Mohammad Shahid Khan	Muhammad Israr Khan	GPS No 4 P II Hayat Abad	Peshawar	GHS Rengi Pesh	Against V/Po
123	Mohammad Zaki	Aziz Gul	CT GHSS Sherpur	Charsadda	GHS Budni Pesh	Against V/Po
124	Mohammad Nabi	Sher Ali	CT GHS Gaddar	MDN	GHS Gauderi Payan Nowshera	Against V/Po
125	Mohammad Naem	Hikmat Khan	CT. GMS Topi	Swabi	GMS Palosi Payan NSR	Against V/Po
126	Ali Jaffer	Said Jaffer	CT. GHS Muzsaber	Swabi	GMS Darwazga NSR	Against V/Po
127	Mohammad Israr	Amir Zahid	CT. GHS Panjpir	Swabi	GHS Mali Khatla NSR	Against V/Po
128	Said Saadat Shah	S. Sajawal Shah	PTC. GHS Sird Chenna	Swabi	GHS Khatla Khel NSR	Against V/Po
129	Roshan Zameer	Huzrat Mir	DM. Khat Khatla	Nowshera	GMS L.C Aman Garh NSR	Against V/Po
130	Mohammad Ayub	Shahid Khan	GPS No 2 Umar Payan	Peshawar	GMS Bakhtal NSR	Against V/Po
131	Abdul Waheed	Firdous Iqbal	PTC. GHS No. 2 Zaida	Swabi	GHS Jaroba NSR	Against V/Po
132	Masruminallah	Abdul Waheed	CT GHS Raja Hawas	Swabi	GMS Garoo NSR	Against V/Po
133	Jan Bohajar	Hindar	PTC. GHS Shawa	Swabi	GHS Shah Kot NSR	Against V/Po
134	Ashraf Khan	Shahbaz Khan	CT. GHS ...	Swabi	GHS Jaba Khattak NSR	Against V/Po
135	Abdul Raziq	Muqadar Khan	CT. GHS ...	MDN	GHS No. 2 NSR Kalan	Against V/Po
136	Zameer Shah	Mir Ahmad Shah	CT. GHS ...	Charsadda	GHS P. Kati Khel NSR	Against V/Po
137	Mohd. Saif Iqbal	Muhammad Iqbal Khan	DM. GMS Gul Dandi	Nowshera	GMS Akora Khattak NSR	Against V/Po
138	Abdul Mojeed	Samar Gul	CT GHS Sreen Klak	Nowshera	GHS Splen Khak NSR	Against V/Po
139	Rawat Khan	Muhammad Salim Khan	CT. GMS Lahor	Swabi	GHS Badrashi NSR	Against V/Po
140	Sajid Ali	Azizar Rehman	CT. GHS ...	Charsadda	GHS No. 1 NSR Kalan	Against V/Po
141	Zaid ul Islam	Shameel Islam	CT. GHS Pebbi	Nowshera	GHS Dag Beaud NSR	Against V/Po
142	Ashraf Ali	Ghufourul Haq	CTGMS Marchaki	Charsadda	GHS Mauld Sharif NSR	Against V/Po
143	Hidayat ur Rehman	Abdul Hakim	CT GHS Gujrat	MDN	GHS Gujrat Mardan	Against V/Po
144	Abdul Abad	Said Akber	CT. GMS Panjman	Swabi	GHS Inzari NSR	Against V/Po
145	Zahid Shah	Zahir Shah	CT GHSS Taidit Bhat	MDN	GMS Siavi NSR	Against V/Po
146	Muhammad Shafi	Mirzaat Shah	CT. GHS Julozai	Nowshera	GHS Dik Ismail Khel NSR	Against V/Po
147	Muhammad Ayaz	Hoor Muhammad Khan	CT. GHS Mula Kili	Nowshera	GHS Mula Kili NSR	Against V/Po
148	Munir Akbar	Siba Muhammad	CT GMS Jung (Lahwar)	MDN	GHS Khatir Abad NSR	Against V/Po

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149	Qal Farid Khan	Isa Khan	GHS No 4 Conit	Peshawar	GMS Bazid Khati Banda Pesh	Against V.P.
150	Races Khan	Azam Din	PTC.GIS Kund	Nowshera	GMS Charibpura NSR	Against V.P.
151	Fazaid Mohammad	Umar Nawaz	CT.GMS Dui Serai	MDN	GMS Zando Banda NSR	Against V.P.

**TERMS AND CONDITIONS OF THEIR APPOINTMENTS.**

- 1 They will be governed by such rules and regulations as may be prescribed from time to time by the Govt. for the category of the Govt. servants to whom they belong.
- 2 Their services will be liable to be terminated on one month's notice from either side. In case of resignation without notice one month pay will be forfeited in lieu thereof.
- 3 They will take over charge within 15 days after 21.09.2003.
- 4 Their inter-se-seniority will be determined in accordance with the merit fixed by the Departmental Selection Committee.
- 5 They shall be on-probation for a period of two years.
- 6 They shall be required to furnish copies of all their certificates/degrees along with the original receipts photo copies thereof pertaining to the verification fee of the concerned examining body (Board/University) to the EDO (Schools & Literacy)/AEO (Edu:) concerned. The latter shall arrange verification of all the certificates/degrees of the appointee of their respective District/Agency and will issue a clearance certificate to each appointee for the release of his pay. His pay bill should not be submitted to the Accounts Office concerned before verification of all certificates/degrees from the concerned institution of each candidate.
- 7 The Heads of the Institution/DDO must check the service books of the in-service teachers before handing over charge to them.
- 8 Compliance report regarding taking over charge by the appointee within stipulated period should be submitted to this Directorate after 30.9.2003.
- 9 The Service of newly appointees should be checked whether they had been working on contract regular basis before their appointment as SET. In case the in-service teacher working on contract and appointed on regular basis against SET post by virtue of this appointment, their order will be null and they will be appointed on contract basis. The EDO (S&L) concerned should immediately inform Director Schools & Literacy NWFP in this respect.
- 10 No TA/DA etc. is allowed.
- 11 Charge reports should be submitted (in duplicate) to all concerned.

(MUHAMMAD JAMSHED KHAN TANOLI  
DIRECTOR SCHOOLS & LITERACY  
NWFP PESHAWAR

**File No. 151/A-14/SETs (M&F) Appointments/2003/DSL/AD (Estt-I)**

Enclst No. 4385-4711/ Dated Peshawar, the 24/07/2003.

- Copy forwarded for information and necessary action to the:-
- 1 Minister for Education NWFP.
  - 2 Secretary to Govt of NWFP Schools & Literacy Department Peshawar.
  - 3 Accountant General NWFP Peshawar.
  - 4 Director of Education (FATA) NWFP Peshawar.
  - 5 Director Curriculum and Teachers Education NWFP Abbottabad.
  - 6 Executive District Officers (S&L) of districts concerned.
  - 7 District Accounts Officers concerned.
  - 8 Section Officer (Schools) Govt of NWFP Schools & Literacy Department w/r to his letter No. SO (S) 3-2/2000, SS(M) dated 03.09.2002.
  - 9 Section Officer (General) Govt of NWFP Schools & Literacy Department w/r to his letter No. SO (G)/S&L/ 1-47/2003 dated 27.6.2003.
  - 10 Deputy District Officer (M) concerned.
  - 11 Principals/Head Masters concerned.
  - 12 Candidates concerned.
- PA to Director Schools & Literacy NWFP Peshawar.

(HYDARATULAN AFGHANI)  
ADDITIONAL DIRECTOR ESTAB:  
DIRECTOR SCHOOLS & LITERACY  
NWFP PESHAWAR

20 10554/850  
SSC PA BA BEd MA MBEd  
20 20 20 20 10 5 1 2 10

1/28/77

Period: 2/27/77 - 3/30/77

For the year ending 3/31/77  
with a balance forward of \$100.00

Yours respectfully,  
[Signature]

Thank you

considered for approval

It is further requested that my report be favorable

regarding formula. I am in doubt as to what the S.M.P. that

appears in view of the above/figure and regarding the pro

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# DIRECTORATE OF SCHOOLS & LITERACY NWFP PESHAWAR

## ORDER

Consequent upon acceptance of appeals and re-allocation of Merit position, weightage, score by the Scrutiny Committee. For the recommendation/selection by the Departmental Selection Committee, the Director Schools & Literacy NWFP Peshawar has been pleased to appoint the following S.E.Ts (General/Multi) in UPS-16 on Regular Basis (Rs. 3303-293-12655) plus usual allowances as admissible under the rules and posted in the schools as noted against their names with immediate effect. However their seniority will be reckoned with effect from 1.9.2003.

S.#	Zone	Name/Father Name	Father's Name	Address	Domicile	Place of Posting	Remarks
1	I	Master Khan	Saifur Rehman	CT GHS Zoor Bandar Bajour Agency	Bajour Agency	Services place at the disposal of DE (PATA) NWFP for further posting against SET (General) vacant post.	
2	II	Mr. Fay Wali Khan	Muqadar Khan	CT GCMHS Akora Khattak Nowshera	Nowshera	SET (Gen) CT GHS Akora Khattak Nowshera	Vacant post
3	II	Mr. Raz Khan	Dilawar Khan	CT GHS Tarnab Charsadda	Charsadda	SET (Gen) GHS Tala Band Peshawar	Vacant post

### TERMS AND CONDITIONS OF THEIR APPOINTMENTS.

- They will be governed by such rules and regulations as may be prescribed from time to time by the Govt. for the category of the Govt. servants to whom they belong.
- Their services will be liable to be terminated on one month's notice from either side. In case of resignation without notice one month pay will be forfeited in lieu thereof.
- They will take over charge within one month.
- Their seniority will be determined in accordance with the merit fixed by the Departmental Selection Committee.
- They shall be on probation for a period of two years.
- They shall be required to furnish copies of all their certificates/degrees along with the original receipts and photo copies thereof to the EDO (Schools & Literacy) AFO (Adm.) concerned. The latter shall arrange verification of all the certificates/degrees of the appointee at their respective District Agency and will issue a clearance certificate to each appointee for the release of his pay. His pay bill should not be submitted to the Accounts Office concerned before verification of all certificates/degrees from the concerned institution of each candidate.
- The Heads of the Institution/DO must check the service books of the in-service teachers before handing over charge to them.
- Compliance report regarding taking over charge by the appointee within stipulated period should be submitted to this Directorate after one month.
- The Service of newly appointees should be checked whether they had been working on contract or regular basis before their appointment as SET. In case the in-service teacher working on contract basis and appointed on regular basis against SET post by virtue of this appointment, their order will be revised and they will be appointed on contract basis. The EDO (S&L) concerned should immediately inform the Director Schools & Literacy NWFP in this respect.
- No TA/DA etc. is allowed.
- Charge reports should be submitted (in duplicate) to all concerned.

MULHAMMAD JAMSHED KHAN TANOLU  
DIRECTOR SCHOOLS & LITERACY  
NWFP PESHAWAR

File No: 151-A-14/SETs (M&T) Appointments/2003/DSI/AD (Est-I)

Form No: 441-20

Copy is attached for information and necessary action to the:

- Minister for Education NWFP
- Secretary to Govt. NWFP Schools & Literacy Department Peshawar
- Director of Education (PATA) NWFP Peshawar
- Executive District Officers (S&L) of the Zone concerned
- District Accounts Officers concerned
- Section Officer (Schools) Govt of NWFP Schools & Literacy Department Peshawar.
- Section Officer (Accounts) Govt of NWFP Schools & Literacy Department Peshawar
- Participating Institutions concerned
- Candidates concerned
- For File

Dated Peshawar the 29/9/2003.

JAMSHED KHAN  
DEPUTY DIRECTOR (S&L)  
DIRECTOR SCHOOLS & LITERACY  
NWFP PESHAWAR



10.05.2022

Appellant alongwith his counsel present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Due to paucity of time, arguments could not be heard. To come up for arguments before the D.B on 24.05.2022.



(Fareeha Paul)  
Member (E)



Chairman

24<sup>th</sup> May, 2022

Junior to counsel for the appellant present. Mr. Naseerud Din Shah, Shah, Asstt. AG for the respondents present.

Former seeks adjournment due to non-availability of learned senior counsel for the appellant. The appeal pertains to the year, 2018. Last chance is given to the appellant for arguments, otherwise, the case will be decided on the basis of available record without the arguments. To come up for arguments on 09.08.2022 before the D.B.



(Fareeha Paul)  
Member (E)



(Kalim Arshad Khan)  
Chairman

9-8-2022

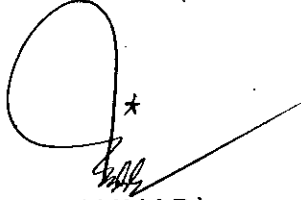
Due to the Public holiday the case is adjourned to 9-11-2022

  
Reader

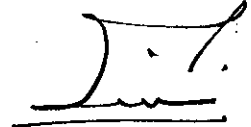
S.A No. 914/2018  
26.10.2021

Appellant alongwith his counsel Mr. Yasir Saleem, Advocate, present. Mr. Riaz Ahmed Painsdakhel, Assistant Advocate General for the respondents present.

R Despite directions being given to the respondents vide orders dated 09.03.2020 as well as 30.07.2021, the respondents have failed to produce the record regarding the merit list of appointment of SET dated 24.07.2003 and corrigendum dated 29.09.2003. Even today, it was stated by the learned Assistant Advocate General that the concerned record has not been provided to him. In these circumstances, Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar shall personally appear before the Tribunal alongwith the concerned record and to come up for arguments on 20.01.2022 before the D.B. Copy of this order be sent to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar for information and compliance.



(MIAN MUHAMMAD)  
MEMBER (E)



(SALAH-UD-DIN)  
MEMBER (J)

20.01.2022

R Appellant present in person Mr. Muhammad Riaz Khan Painsdakhel, Asstt. AG for the respondents present.

Due to general strike of the Bar, counsel for the appellant is not in attendance. Case to come up for arguments on 10.05.2022 before the D.B.



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



Chairman

13.01.2021

Junior to counsel for the appellant and Mr. Kabirullah Khattak learned Addl. AG for respondents present.

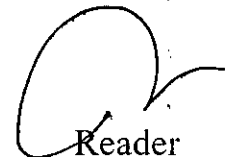
Due to COVID-19, the case is adjourned for the same on 21.04.2021 before D.B.



READER

21.04.2021

Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 30.07.2021 for the same as before.



Reader

30.07.2021

Appellant present in person.

Muhammad Rasheed learned Deputy District Attorney for respondents present.

Respondents were directed to submit record of seniority list vide order dated 09.03.2020 but compliance is still awaited. Even today, they despite having been given sufficient time, could not be able to produce the requisite record. They are directed to do the needful positively before the next date. To come up for arguments on 26.10.2021 before D.B.



(Rozina Rehman)  
Member (J)



Chairman

4.5 .2020

Due to COVID19, the case is adjourned to 15/7/2020 for the same as before.

  
Reader

15.07.2020

Due to COVID19, the case is adjourned to 26.08.2020 for the same as before.

  
Reader

26.08.2020

Due to summer vacation case to come up for the same on 02.11.2020 before D.B.

  
Reader

02.11.2020

Junior to counsel for the appellant and Addl. AG for the respondents present.

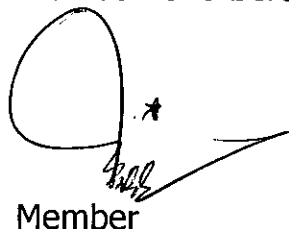
The Bar is observing general strike, therefore, the matter is adjourned to 13.01.2021 for hearing before the D.B.

  
(Mian Muhammad)  
Member

  
Chairman

09.03.2020

Appellant with counsel present. Mr. Muhammad Jan, DDA alongwith Mr. Irfanullah, Assistant for respondents present. Learned counsel for the appellant submitted rejoinder which is placed on file. The appellant alongwith with others were appointed as SET vide order dated, 24.07.2003 w.e.f 01.09.2003, however, the name of the appellant was not mentioned in the appointment order dated 24.07.2003, therefore, the appellant submitted an application/representation for mentioning his name in the appointment order and on the application of the appellant the respondent department issued corrigendum dated 29.09.2003, wherein the name of the appellant and two others were mentioned as SET. Learned counsel for the appellant stated that later on seniority list was issued but name of the appellant was not placed at his due place, therefore, requested that merit list of the SET may be requisitioned. Representative of the respondents is strictly directed to furnish merit list of appointment order of SET dated 24.07.2003 and corrigendum dated 29.09.2003. Adjourned. To come up for record and arguments on 04.05.2020 before D.B.



Member



Member

12.11.2019

Counsel for the appellant present. Mr. Ziaullah, DDA for respondents present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 03.01.2020 before D.B.

  
Member

  
Member

03.01.2020

Junior to counsel for the appellant present. Mr. Usman Ghani learned District Attorney for the respondents present. Junior to counsel for the appellant requested for adjournment as senior counsel for the appellant is not available today. Adjourned. To come up for arguments on 09.03.2020 before D.B.

  
(Hussain Shah)  
Member

  
(M. Armin Khan Kundi)  
Member

19.06.2019

Junior to counsel for the appellant and Mr. Muhammad

Jan learned Deputy District Attorney for the respondents

present. Junior to counsel for the appellant requested for

re-adjournment as senior counsel for the appellant is not in

attendance. Adjourn. To come up for arguments on 19.08.2019

before D.B.

to the revised leave rules. The applicant is entitled to the

Member. If approved, granted.

Member

After submitted for signature and approval please

ACCOUNTANT

19.08.2019

Learned counsel for the appellant present. Mr. Zia Ullah

learned Deputy District Attorney for the respondents

present. Learned counsel for the appellant submitted

rejoinder which is placed on file, and seeks adjournment.

Adjourned. To come up for arguments on 07.10.2019 before

D.B.

(Hussain Shah)  
Member

(M. Amin Khan Kundi)  
Member

07.10.2019

Appellant in person present. Mr. Usman Ghani learned

District Attorney present. Adjournment requested. Adjourn. To

come up for arguments on 19.11.2019 before D.B

Member

Member

**Service Appeal No. 914/2018**


**01.01.2019**

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG for the respondents present. Written reply on behalf of respondents No. 1 & 2 submitted. Learned Additional AG relies on the written reply submitted by respondents No. 1 & 2 on behalf of respondent No. 3. Adjourned. The appeal is assigned to D.B-II for rejoinder and arguments for 06.03.2019.

  
**Muhammad Amin Khan Kundi**  
Member

**06.03.2019**

Counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Learned counsel for the appellant seeks adjournment to furnish rejoinder. Adjourn. To come up for rejoinder and arguments on 30.04.2019 before D.B.

  
(M. HAMID MUGHAL)  
MEMBER

  
(M. AMIN KHAN KUNDI)  
MEMBER

**30.04.2019**

Clerk of counsel for the appellant and Mr. Riaz Ahmad Pinda Khel, Assistant AG for the respondents present. Clerk of counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy before the Hon'ble Peshawar High Court. Adjourned to 19.06.2019 for rejoinder and arguments before D.B.

  
(AHMAD HASSAN)  
MEMBER

  
(M. AMIN KHAN KUNDI)  
MEMBER



24.09.2018

Mr. Taj Wali, appellant alongwith his counsel Mr. Yasar Salim, Advocate present and heard on preliminary.

Contends that the appellant though was senior and qualified in all respect but even then he was ignored and his junior was placed senior to him in the seniority list issued by the Authority.

Points raised need consideration. The appeal is admitted to full hearing, subject to all legal objections, if raised by the respondents. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 13.11.2018 before S.B.

Appellant Deposited  
Security & Process Fee

  
Chairman

13.11.2018

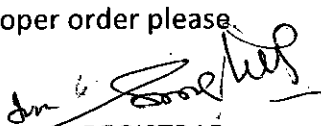


Due to retirement of Hon'ble Chairman, the Tribunal is defunct. Therefore, the case is adjourned. To come up on 01.01.2019. Written reply not received.

  
READER

Form -A  
FORM OF ORDER SHEET

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

Case No. 914/2018


S.No.	Date of Order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	19/07/2018  <i>21-7-2018</i>	<p style="text-align: center;">The appeal of Mr. Taj Wali Khan resubmitted by Mr. Yasir saleem Advocate may be entered in the Institution register and put up to the Wrothy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p style="text-align: center;">The case is entrusted to S. Bench for preliminary hearing to be put up there on <i>28-8-2018</i></p> <p style="text-align: right;"> CHAIRMAN</p> <p style="text-align: center;">None present on behalf of the appellant. Adjourned. To come up for preliminary hearing on 24.09.2018 before S.B.</p> <p style="text-align: right;"> (Ahmad Hassan) Member</p>
	28.08.2018	

The appeal of Mr. Taj Wali Khan SS English GHSS Khairabad Nowshera received today i.e. on 29.05.2018 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 1- Memorandum of appeal is not signed by the counsel
- 2- Annexures of the appeal may be flagged.
- 3- Annexures of the appeal are unattested.
- 4- Copies of application 28.7.2010, notification dated 28.3.2014, 14.4.2014, 5.7.2014 and letter dated 28.7.2014 mentioned in the memo of appeal are not attached with the appeal which may be placed on it.
- 5- Copies of application dated 23.1.2017 and 30.1.2017 mentioned in para-8 of the memo appeal are not attached with the appeal which may be placed on it.
- 6- Copy of zonal wise summary is illegible which may be replaced by legible/better one.
- 7- Sub-rule-4 of rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974 requires that every civil servant to whom the relief claimed may affect shall also be shown as respondent.
- 8- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent may also be submitted with the appeal.

No. 1139/S.T.

Dt. 01/06 /2018.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Yasur Saleem Adv. Pesh.

All annexures/objections  
was removed & resubmitted  
Accordingly



18/7/18

Sia Resubmitted

1) IT WAS SIGNED 2) FLAGGED 3) ATTESTED  
4) IT WAS PLACED 5) IT WAS ATTACHED 6) MADE BETTER COPY  
7) " " PLACED AS RESPONDENT 8) SUBMITTED WITH APPEAL

8

**BEFORE THE KHYBER PAKHTUNKWA  
SERVICE TRIBUNAL PESHAWAR**

Appeal No. 914 /2018

Taj Wali Khan SS (English), GHSS Khairabad Nowshera

(Appellant)

**VERSUS**

Govt of Khyber Pakhtunkhwa through Chief Secretary Khyber  
Pakhtunkhwa, Peshawar and others.

(Respondents)

**INDEX**

S.No	Description of Documents	Annexure	Page No
1.	Memo of Appeal		1-4
2.	Copies appointment notification dated 24.07.2003, application dated 28.07.2003 and corrigendum notification dated 29.09.2003	A, B & C	5-8
3.	Copy of application dated 28.07.2010	D	9
4.	Copies of notification dated 28.03.2014, applications dated 14.04.2014 & 05.07.2014 and forwarding letter dated 28.07.2014	E, F & G	16- 17
5.	Copies promotion notification dated 17.03.2016 & application dated 04.04.2016	H& I	18- 22
6.	Copies tentative seniority list as it stood on 31.12.2016 & application dated 23.01.2017 and forwarding letter dated 30.01.2017	J, K& L	23- 27
7.	Copy of final seniority list of SS as it stood on 23.10.2017	M	28- 32
8.	Copy of the Departmental Appeal 29.01.2018	N	33-35
	Vakalatnama		36

*Appellant*

Through

  
**YASIR SALEEM**  
Advocate Peshawar.

**BEFORE THE KHYBER PAKHTUNKWA  
SERVICE TRIBUNAL PESHAWAR**

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1020

Dated 30-5-2018

Appeal No. \_\_\_\_\_/2018

Taj Wali Khan SS (English), GHSS Khairabad Nowshera

(Appellant)

**VERSUS**

1. Govt of Khyber Pakhtunkhwa, Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male), District Nowshera .

(Respondents)

**Appeal under section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, against the final seniority list of Subject Specialist BPS-17 as it stood on 23.10.2017 circulated in the month of December 2017 and communicated to the appellant on 01.01.2018 against which the departmental appeal dated 29.01.2018, has not been responded despite the lapse of statutory period.**

Prayer in Appeal:

F: \_\_\_\_\_ day  
K: \_\_\_\_\_  
30/5/18

On acceptance of this appeal, the final seniority list of SS BPS-17 as it stood on 23.10.2017, may please be set aside, the undersigned may please be allowed his correct place at the seniority list,

Respectfully Submitted:

1. That the appellant was initially appointed as PTC teacher (now renamed as PST) vide order dated 09.01.1988. During the course of employment he got promoted as C.T vide order dated 24.10.1993.
2. That ever since appointment, the appellant performed his duties as assigned with zeal and devotion and has never given any chance of complaint whatsoever regarding his performance.
3. That in the year 2003 the appellant applied for the post of S.E.T on batch wise method/appointment. However his name was not included in the appointment notification dated 24.07.2003. It is pertinent to mention here that the said notification was given effect

from 01.09.2003. Feeling aggrieved the appellant filed appeal for his appointment vide my application dated 28.07.2003. Accordingly a corrigendum notification was issued on 29.09.2009 vide which the appellant was also issued the appointment notification wherein it was specifically mentioned that inter-se seniority will be determent in accordance with the merit fixed by the Departmental Selection Committee. It is pertinent to mention here the appellant got 55.25 marks in the said test. *(Copies appointment notification dated 28.07.2003, application dated 28.07.2003 and corrigendum notification dated 29.09.2003 are attached as Annexure A, B & C respectively)*

4. That on appeal the appellant was consequently appointed vide appointment notification dated 29.09.2003. It was also mentioned in the notification that his seniority will be reckoned wef. 01.09.2003.
5. That in the year 2010, tentative seniority list of SET's was issued however the name of the appellant was missing in the said list. He filed application vide application dated 28.07.2010 for the inclusion of his name in the said List. *(Copy of application dated 28.07.2010 is attached as Annexure D)*
6. That in the year 2015 on the recommendation of Departmental Promotion Committee the appellant, amongst other SET's, was upgraded from BPS-16 to BPS-17 vide notification dated 28.03.2014. Although he also got the up gradation but found his name at Seniority List No. 4136 much below the name of his colleague namely Muhammad Asif Iqbal was placed at Serial No. 3788. Again the appellant filed the applications on 14.04.2014 and 05.07.2014 for allocation of his due placement in the seniority list, which was forwarded to Director Elementary and Secondary Education Peshawar vide letter dated 27.08.2014, however no action was taken. *(Copies of notification dated 28.03.2014, applications dated 14.04.2014 & 05.07.2014 and forwarding letter dated 28.07.2014 are attached as Annexure E, F & G respectively)*
7. That in the meantime the appellant was promoted to the post of Subject Specialist BPS-17 vide notification dated 17.03.2016, but the same error existed in the seniority list as the appellant found his name at improper place at Serial No. 4056. The appellant filed application dated 04.04.2016. *(Copies promotion notification dated 17.03.2016 & application dated 04.04.2016 are attached as Annexure H & I respectively)*
8. That the tentative list of subject Specialist BPS-17 as it stood on 31.12.2016 was issued in January 2017, wherein the same error existed. The appellant filed application dated 23.01.2017 which was forwarded to the Director E & S Education Peshawar vide letter dated 30.01.2017, however no action was taken. *(Copies tentative*

*seniority list as it stood on 31.12.2016 & application dated 23.01.2017 and forwarding letter dated 30.01.2017 are attached as Annexure J, K& L respectively)*

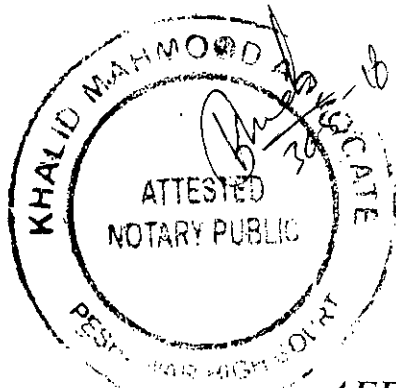
9. That later the final seniority list of Subject Specialist as it stood on 23.10.2017 has been issued, the copy of which the appellant got on 1<sup>st</sup> of January 2018. In the said list he was placed at serial No. 2409 much junior to his colleague namely Asif Iqbal who is placed at 2362. *(Copy of final seniority list of SS as it stood on 23.10.2017 is attached as Annexure M)*
10. That the appellant submitted his departmental appeal dated 29.01.2018 to the respondent, however the appeal has not been responded despite the lapse of 90 days statutory Period. *(Copy of the Departmental Appeal 29.01.2018 is attached as Annexure N)*
11. That the impugned acts on the part of the Respondents are illegal, unlawful, against the law and rules and is based on malafide inter alia on the following grounds:

#### **GROUND OF DEPARTMENTAL APPEAL:**

1. That rights of the appellant secured and guaranteed under the law are badly violated.
2. That he has not been treated in accordance with law.
3. That the appellant through our agitated the issue of his seniority, he filed so many applications from time to time in this regard however no action has been taken on his applications.
4. That name of the appellant was not included in the notification dated 24.07.2003 and on his application subsequently he was issued appointment notification dated 29.09.2003. It was specifically mentioned in the initial notification dated 01.09.2003 that inter se seniority would be in accordance with the merit fixed by the departmental selection committee. Name of the appellant was excluded from the appointment notification dated 01.09.2003 which was subsequently corrected on his application and he was given appointment notification wherein it was mentioned that his seniority would be determined with effect from 01.09.2003.
5. That name of the appellant was not included in the original notification dated 01.09.2003 which was not his fault. The appellant got 59 marks and had every right to be included in the notification dated 01.09.2003. However on his application he was subsequently appointed so he cannot be suffered for the acts and omissions of the department.
6. That the said teacher was much junior to the appellant, as his first appointment in the department is 12.01.1988 whereas the said teacher initial appointment was on 09.12.1989. Further his

- marks for the SET were 59.25 whereas the said teacher namely Muhammad Asif Iqbal got round about 56 marks.
7. That the appellant cannot be deprived of his rights of seniority and it would be counted from the date of regular appointment. He could, thus, not be legally deprived of his rights.
  8. That the appellant has been placed at improper place in the impugned final seniority list which is in conflict and against the rules on the subject. Due the acts and omissions of the department even his juniors have become senior to him.
  9. That the appellant seeks the permission of this Honourable Authority to rely on additional grounds at the hearing of this appeal.

*It is therefore prayed that on acceptance of this appeal, the final seniority list so circulated may please be set aside, the undersigned may please be allowed his correct place at the seniority list,*



Through

*Appellant*  
*Yasir Saleem*  
 YASIR SALEEM  
 Advocate Peshawar.

AFFIDAVIT

It is solemnly affirm and declare on oath that the contents of the above Appeal as well as accompanied application are true and correct to best of my knowledge and believe and that nothing has been kept back or concealed from this Honourable Tribunal.

*Deponent*  
 Deponent



DIRECTORATE OF SCHOOLS & LITERACY NWFP PESHAWAR

ANNEX "A"

Consequent upon recommendation/selection by the Departmental Selection Committee, the Director Schools & Literacy NWFP Peshawar has been pleased to appoint the following S.E.Ts (General/Male) in BPS-16 on Regular Basis. (Rs.3805-295-12655) plus usual allowances as admissible under the rules and posted in the schools as noted against their names with effect from 01.09.2003 subject to the terms and conditions mentioned below: -

Zone II General (Male)

S.No.	Name/Father Name	Father's Name	Address	Domicile	Place of Posting	Remarks
1	Khair Muhammad	Abdur Rauf	CT GHS Turmab Forti	Peshawar	GHS Mairago Peshawar	Against V/Post
2	Shaukat Ali	Wahdat Khan	CTGMS Ajoan Kili	Charsadda	GHS Zarinabad Chd	Against V/Post
3	Mazhar Ali	Abdul Balg	CT GHS Sheikhdara Peshawar	Peshawar	GMS Mushterza Peshawar	Against V/Post
4	Sufaid Shah	Wasif Shah	CT.GHS Gar Munara	Swabi	GHS Gar Munara Swabi	Against V/Post
5	Muhammad Tayub	Abdur Rauf	CT GHS Shagai K. Agency	Charsadda	GHS Katoza Chd	Against V/Post
6	Noor ul Haq	Samarqand	CT.GHS Dagan	Swabi	GHS Kala Klam Swabi	Against V/Post
7	Muhammad Sher	Zorjad	CT.GHS Marghuz	Swabi	GHS Marghuz Swabi	Against V/Post
8	Raza Khan	Qadri Rehman	CT GHS Chingar Mati	Charsadda	GMS G/Chandan Bala Pesh	Against V/Post
9	Qasim Ali	Fazli Dargou	PTC GPS Serai Koroma	Mardan	GHS Baribaga Mardan	Against V/Post
10	Shehid ul Din	M. Naseerul Din	AT GHS Amba Dher	Charsadda	GHS Khawaja Khanwas Chd	Against V/Post
11	Shaukat Rehman	Maskeen Khan	CT.GHS Maiki	Swabi	GHS Maiki Swabi	Against V/Post
12	S. Jafarullah	S. Qadri Badshah	PTC GPS Turmab	Charsadda	GHS Adzal Pesh	Against V/Post
13	S. Naeem Jamal	S. Muzafar Shah	SET GHS Pir Pal NSR	Nowshera	GHS Pir Pal Nowshera	Already occupied
14	Abdul Jabbar	Mubillah	PTC GPS Kotac	Charsadda	GHS Dag Pesh	Against V/Post
15	Abdul Abrar	Abdul Khalq	CT GHSS Ghari Kopora	Mardan	GHS G/kopora Mardan	Against V/Post
16	Muhammad Ayub	Muhammad Yaqub Khan	CT GHS Telakai Pesh	Peshawar	GHS Pishindara Bala Pesh	Against V/Post
17	Hameed Khan	Nojeem Khan	CT Jica M/S Mashoo Khel	Peshawar	GHS Mashoo Idari Peshawar	Against V/Post
18	Ihsan Ullah	Saeedullah	CT.GHS Topi	Swabi	GHS Topi Swabi	Against V/Post
19	Ahmad Khan	Mujtab Khan	DM GMS Chahla	Mardan	GHS Sharwa Baida Mardan	Against V/Post
20	Shahjehan	Hameed ul Din	PTC GPS Roldana	Swabi	GMS Sher Gaud Swabi	Against V/Post
21	Niaz Muhammad	Zabir Muhammad	PTC GPS Kala Pur	Mardan	GMS Munga Mardan	Against V/Post
22	Hajier Rehman	Gulab Khan	PTC GPS Umar Bala	Peshawar	GMS Kotli Khard Nowshera	Against V/Post
23	Bad Shah Khan	H. Razaan Gul	CT GHS Hoti Landak	Mardan	GHS Jamal garli Mardan	Against V/Post
24	Sadiq Bura	Mehrab Khan	CT.GHSS Kohli Barmol	Mardan	GHS Kohli Barmol Mardan	Against V/Post
25	Diaz Muhammad	Inayat Khan	CT.GHS No.1 Yur Hussain	Swabi	GHS No.1 Yur Hussain Swabi	Against V/Post
26	Iqbal ul Haq	Sultan Shah	CT.GHS No.1 Yur Hussain	Swabi	GHS Ter Dher Swabi	Against V/Post
27	Qasim Ali	Qasim Rehman	CT GHSS Sher Pao	Charsadda	GHS Shorkla Pesh	Against V/Post
28	Giraj Muhammad	All Bolandar	PTC GPS Patali Baida	Swabi	GHS Ter Dher Swabi	Against V/Post
29	Anwar ul Haq	Ihsanul Haq	CT.GHS Yaqoobi	Swabi	GHS Jehangira Swabi	Against V/Post
30	Munzar Ul Haq	Iqbal Haq	CT GHS Jaina	Mardan	GHS Qazi Abad Mardan	Against V/Post
31	Afnan Khan	Ilyas Khan	CT.GHS Gar Munara	Swabi	GMS Allah Dher Swabi	Against V/Post
32	Hafiz Muhammad	Qadri Muhammad	PTC-GPS Shari Dhand	MDN	GHS Chamtor Swabi	Against V/Post
33	Jarid Khan	Abdul Sattar	GPS Moh: Islamabad	Peshawar	GHS Dag Pesh	Against V/Post
34	Muzamil Shah	Rehman Shah	AT GMS Kandar	MDN	GHS Baribaga Mardan	Against V/Post
35	Huz Muhammad	Khawaja Muhi	CT.GHS Tandkohl	Swabi	GMS Tund Kohli Swabi	Against V/Post
36	Ihsan Qadir	Fazli Qadir	CT.GH Kala Bat	Swabi	GHS Kotha Swabi	Against V/Post
37	Farhad Qadri	Muhammad Qadri	PTC GPS Mirza Esqa	Nowshera	GHS Jehangira NSR	Against V/Post
38	Qasim Ullah	Shahidullah	PTC GPS Juogora	MDN	GMS Gaddar Mardan	Against V/Post
39	Shaukat Khan	Aamrullah	CT.GHS Bazar	Swabi	GHS Bazar Swabi	Against V/Post
40	Wali Ullah	Habibullah	PTC.GPS No.1 Matury	Swabi	GHS Mauni Swabi	Against V/Post
41	Hameed Khan	Munzar Khan	CT.GHS K.S.Kili	Swabi	GHS Chajal Swabi	Against V/Post
42	Asif Ali Shah	Masoom Shah	AT.GHS Khara	Nowshera	GHS Khawaral Nowshera	Against V/Post
43	Muhammad Zamir	Muhammad Hameed	CT GHS Toru	MDN	GHS Bahadr Khan Kote Md	Against V/Post
44	Fazal Muhammad	Hollu Shah	CT.GMS Umar Dheri	Swabi	GHS Salim Khan No.1 Mrd	Against V/Post

Name miss missing  
Application for including his name  
Applied as SET

45	Fazal Ruidhan	Nasir Khan	CT GMS Mangu	MDN	GMS Solani Mardana	Agarist V/Post
46	Sirajul Haq	Ihtaar Khan	CTGMS Cheema	Charsadda	GHS Kheshti Payan NSR	Agarist V/Post
47	Afreen Khan	Sheria Khan	CT.GHS Banu Khel	Swabi	GHS Qajal Swabi	Agarist V/Post
48	Sabz Ali Khan	Sbarif Khan	PTC GPS Gunj Mnodi	Peshawar	GHS Mera Umar Payan Pesh	Agarist V/Post
49	Rahim Khan	Yaqub Khan	CT GHS No.3 Mardana	MDN	GHS Chapura Mardana	Agarist V/Post
50	Shouknt Ali	Faqir Mulid Khan	PTC GPS Gunda	Charsadda	GHS Mali Khel Nowshera	Agarist V/Post
51	Liaqat Ali	Alber Ali	GPS-Yousaf Khan Killi Tangi	Charsadda	GHS Regi Pesh	Agarist V/Post
52	Fazal Rahim	Abdul Qadir	CT.GHSS Khair Abud	Swabi	GHSS Khairabad Nowshera	Agarist V/Post
53	Fazal Ghani	Fazal Robbi	CT.GMS Kalan	Swabi	GHS Qudra Swabi	Agarist V/Post
54	Islam ul Din	Asrafud Din	CT GHS Aman Garh	Nowshera	GHS Aman Garh NSR	Agarist V/Post
55	Abdul Malic	Stanur Quid	CT.GHS Pabani	Swabi	GHS Pabani Swabi	Agarist V/Post
56	Bilal Khan	Junus Khan	CT.GMS Ahmad Khan	Swabi	GHS Haryana Swabi	Agarist V/Post
57	Adil Sher	Mid Dad Khan	PTC GPS Behai	Swabi	GMS Chonrai Swabi	Agarist V/Post
58	Muhammad Sharif	Moua Mohammed	CT GMS Moolano	Peshawar	GMS Mattori Pesh	Agarist V/Post
59	Fazli Rabbi	Fazli Ilahi	CTGMS Marai	Charsadda	GHS No.1 NSR Kalan	Agarist V/Post
60	Noor ul Anin	Rolal Anin	CT.GHS Kunda	Swabi	GHS Deeta Swabi	Agarist V/Post
61	Farman Ali	Amir Zada	CT.GHS Kotli (Sadeh Khana)	Nowshera	GHS Kotli Nowshera	Agarist V/Post
62	Fazli Ilahi	H. Ghulam Muhammad	PTC GPS Bakhsbali	MDN	GHS Meeli Mardana	Agarist V/Post
63	Afsar Ali	Abdul Khaliq	PTC GPS Kot Ismail Zal	MDN	GHS Babozai Swabi	Agarist V/Post
64	Sahibzada Tariq Melanood	Manoood Hossain Akhtar	CT GHS No 2 City	Peshawar	GHS Kaga Wala Pesh	Agarist V/Post
65	Yar Muhammad	Mubid Aslam Khan	PTC GPS Qazi Saral	Charsadda	GHS Matiani Pesh	Agarist V/Post
66	Dil Soz Mohanunad	Sarbiland	CT GHS Gumbat	MDN	GHS Khairabad NSR	Agarist V/Post
67	Jaffar Khan	Muhammad Zorif	DM GMS Takkal Payan	Peshawar	GHS Pishaldura Bala Pesh	Agarist V/Post
68	Haleem Ullah Jua	Abdul Shafi	PTC GPS Doulat Pura	Charsadda	GHS Sheikhan Pesh	Agarist V/Post
69	Sher Afzal Khan	Sher Hassan Khan	CT.GHS Khawana	Nowshera	GHS Khawana Nowshera	Agarist V/Post
70	Hassan Gul	Libra Gal	CT GHSS No 1 Pesh City	Nowshera	GMS Wazir Garh NSR	Agarist V/Post
71	Zain ul Abideen	Mir Qamand	CT.GHS No. 1 Salim Khan	Swabi	GHS Qudra Swabi	Agarist V/Post
72	Fazli Wahab	Fazli Mahmood	PTC GPS Taikhazai	Charsadda	GHS No. 1 NSR Kalan	Agarist V/Post
73	Muhammad Nawaz	Muhammad Nazar	PTC GPS Dukki	Charsadda	GHS Kufor Dheri Pesh	Agarist V/Post
74	Mulhitar Sarwar	Muhammad Sarwar	CT.GMS Gali Dheri	Swabi	GHS Beeka Swabi	Agarist V/Post
75	Miari Khan	Nadir Khan	CT GHS Kharkai	Charsadda	GMS Dheri Kati Khel NSR	Agarist V/Post
76	Muhammad Israr	Pir Muhammad	CT GMS Char Gull	MDN	GHS Behran Kili NSR	Agarist V/Post
77	Muhammad Yousaf	Muhammad Nazir	PTC GPS No.1 Bagladada	MDN	GHS P. Kati Kbel NSR	Agarist V/Post
78	Almasi Saleem	Fazal Chand	CT GHSS Dostera	Charsadda	GHS H M Noor Kili Pesh	Agarist V/Post
79	Rosh ul Anin	Alamgir	CT.GHS No.1 Yar Hussain	Swabi	GHS Samandar, Garh NSR	Agarist V/Post
80	Kaplan Ullah	Noorullah	PTC.GPS No.2 Sur Dher	Swabi	GHS Shalcha Nowshera	Agarist V/Post
81	Tajbir Khan	Sharifullah	CT GHSS Kullang	MDN	GHS Shalcha Nowshera	Agarist V/Post
82	M. Iqees	Abdul Sattar	CT GHS No 1 Charsadda	Charsadda	GHS Mula Kili NSR	Agarist V/Post
83	Muhammad Anifa	Amir Muhammad	CT GHSS Mayra	MDN	GHS Bara Banda NSR	Agarist V/Post
84	Altaf Rehman	Abdul Ghaffar Khan	CT.GMS Zaida	Swabi	GHS Pir Sabaq NSR	Agarist V/Post
85	Muhammad Naem	Muhammad Hassan	CT GHSS Mardana	MDN	GHS Bara Banda NSR	Agarist V/Post
86	Sher Azam Khan	Lal Bahader	CT.GHS Manai	Swabi	GHS Jobbi NSR	Agarist V/Post
87	Manzoor Ahmad	Awal Mir	CT GHS Ghari Kopora	MDN	GHS Mohib Banda NSR	Agarist V/Post
88	Liaqat Ali	Sher Badshah	CT.GMS Dattai	Swabi	GHS Machudi Banda NSR	Agarist V/Post
89	Farman Ali	Awal Din	CT.GHS K.S. Killi	Swabi	GHS No. 1 NSR Cantt	Agarist V/Post
90	Qul Rezaq	Abdul Rezaq	PTC GPS No 2 Tangi	Charsadda	GHS Budezai Pesh	Agarist V/Post
91	Javed Iqbal	Sheda Muhammad	CT GHS Toru	MDN	GHS Mughalla NSR	Agarist V/Post
92	Liaq Zaman	Ghulam Rehman	PTC.GPS Khul	Swabi	GHS Jobbi Nowshera	Agarist V/Post
93	Fazli Raaf	Saifur Rehman	CT GHS Mazdoor Abad	MDN	GHS Behran Kili NSR	Agarist V/Post
94	Sibghat Ullah	Wasiullah	CT GHSS Shah Baz Garh	MDN	GHSS Z K K Sahib NSR	Agarist V/Post
95	Mushaq Ali	Abdul Jamil	CT.GMS Gehar Abad	Swabi	GHS Jobbi NSR	Agarist V/Post

97	Abd Ullah	Saudullah	GHS Paldan Ghulam	Charsudda	GHS Paldan Ghulam Pesh	Against V/Po
98	Farman Ullah	Kujeer Gul	CT GHS Sawaryan	MDN	GHS Aman Garh NSR	Against V/Po
99	Shahen Shah	Sherzoda	CT GHS No 1 Charsudda	Charsudda	GHS No.1 Charsudda	Against V/Po
100	Ezhar Ahmad	Bashir Ahmad	CT GHS Toru	MDN	GHS Z K K Sahib NSR	Against V/Po
101	Inayat Karim	S.Abdur Rehman	CT GHS Labour Colony	MDN	GHS Labour Colony Mardan	Against V/Po
102	Niaz Badshah	Khana Badshah	CT GHS Miana Essa	Charsudda	GHS Masho Gugur Pesh	Against V/Po
103	Nabi ur Rahman	Abdullah Khan	CT GHS Kati Ghari	MDN	GHS Kati Garhi Mardan	Against V/Po
104	Mohammad Tariq	S. Behawnd Shah	PTC. GHS No. 2 Zaida	Swabi	GHS Marbat Bandi NSR	Against V/Po
105	Abdul Aziz	Abdul Fawid	CT GHS Gujrat	MDN	GHS Gujrat Mardan	Against V/Po
106	Amjad Khan	Khana Babadar	CT GHS Khair Abad	MDN	GHS P. Kati Khel NSR	Against V/Po
107	Iqbal Ali Shah	Sajawal Shah	CT GHS No. 1 Yar	Swabi	GHS Nizampur NSR	Against V/Po
108	Raza Muhammad	Taj Muhammad	CT. GHS. K. S. Kili	Swabi	GMS Shor Ghund Swabi	Against V/Po
109	Fida Muhammad	Khan Muhammad	GHS Zahir Abad	Peshawar	GHS G/Ghulam Shah Pesh	Against V/Po
110	Muhammad Youness	Abdullah Jan	DM GHS Umar Miana	Peshawar	GHS Umar Miana Pesh	Against V/Po
111	Gul Rehman	Jan Muhammad	CT GHS Shaghali Payan	Peshawar	GHS Shaghali Payan Pesh	Against V/Po
112	Sana Ullah	Abdul Baqi	CT GHS Gumbat	MDN	GHS Khesari NSR	Against V/Po
113	Saiful Islam	Abdul Karim	CT GMS Chada	MDN	GHS Zira Miana NSR	Against V/Po
114	Muhammad Istiaq	Muhammad Haroon	CT GMS Holi Landala	MDN	GHS Aza Khel Bala NSR	Against V/Po
115	Jamil Ahmad	Momen Khan	PTC. GPS Muzira	Charsudda	GHS Surezal Bala Pesh	Against V/Po
116	Sher Zameen Khan	Wasil Khan	PTC. GSP Marghat	Swabi	GHS Nizampur NSR	Against V/Po
117	Jehanzeb Khan	Feroz Khan	CTGHS Reggi	Peshawar	GHS Lakarai Khatla Pesh	Against V/Po
118	Qazi Hussain Ahmed	Q. Hubilar Rehman	CT. GHS Mughlki	Nowshera	GHS Akora Khattak Nowshera	Against V/Po
119	Zulfikar Ali	Shahzoda	CT. GHS Khesgi Bala	Nowshera	GHS Khesgi Bala NSR	Against V/Po
120	Niaz Muhammad	Ameer Muhammad	CT. GHS Degai	Swabi	GHS Adamzai NSR	Against V/Po
121	Syed Gulam Saah	S. Rehman Shah	CT GHS Aza Khel Mardan	Peshawar	GHS Aza khel Mardan Pesh	Against V/Po
122	Muhammad Shabbaz Khan	Muhammad Israr Khan	GPS No 4 P II Hayat Abad	Peshawar	GHS Regi Pesh	Against V/Po
123	Muhammad Zaki	Azra Gul	CT GHS Sherpud	Charsudda	GHS Budal Pesh	Against V/Po
124	Mohammad Nabil	Sher Ali	CT GHS Gaddar	MDN	GHS Gauderi Payan Nowshera	Against V/Po
125	Muhammad Naeem	Hilurat Khan	CT. GMS Topi	Swabi	GMS Palosi Payan NSR	Against V/Po
126	Mir Jaffer	Said Jaffer	CT. GHS Munsabdar	Swabi	GMS Darwazgal NSR	Against V/Po
127	Muhammad Israr	Amir Zabid	CT. GHS Panjpir	Swabi	GHS Mali Khela NSR	Against V/Po
128	Said Steidat Shah	S. Sajawal Shah	PTC. GPS Sard Cheena	Swabi	GMS Kana Khel NSR	Against V/Po
129	Rashan Zameer	Huzrat Mir	DM. Khat Kila	Nowshera	GMS L. C Aman Garh NSR	Against V/Po
130	Muhammad Ayub	Shahid Khan	GPS No 2 Farnur Payan	Peshawar	GMS Brikhtal NSR	Against V/Po
131	Abdul Waheed	Firdous Khan	PTC. GPS No. 2 Zaida	Swabi	GHS Jaroba NSR	Against V/Po
132	Muhammad Allah	Abdul Waheed	CT GHS Raja Hawas	Charsudda	GMS Garoo NSR	Against V/Po
133	Jan Babbar	Haidar	PTC. GPS Shawa	Swabi	GHS Shah Kot NSR	Against V/Po
134	Azhar Khan	Shabbaz Khan	CT. GPS	Swabi	GHS Jaba Khattak NSR	Against V/Po
135	Abdul Ruziq	Muqadar Khan	CT. GHS Gulang	MDN	GHS No. 2 NSR Kalan	Against V/Po
136	Zaher Shah	Mir Ahmad Shah	CT. GHS Khat Ullah	Charsudda	GHS P. Kati Khel NSR	Against V/Po
137	Muhammad Asif Iqbal	Muhammad Iqbal Khan	DM. GMS Gul Darri	Nowshera	GMS Akora Khattak NSR	Against V/Po
138	Abdul Mojeed	Samar Gul	CT GHS Screen Khak	Nowshera	GHS Spin Khak NSR	Against V/Po
139	Rawaf Khan	Muhammad Salim Khan	CT. GMS Lohor	Swabi	GHS Badroshi NSR	Against V/Po
140	Sajad Ali	Azhar Rehman	CT GHS T. rumb	Charsudda	GHS No. 1 NSR Kalan	Against V/Po
141	Zaid ul Islam	Shameer Islam	CT. GHS Pabli	Nowshera	GHS Dag Besud NSR	Against V/Po
142	Ashraf Ali	Ghafoorul Haq	CTGMS Marchaki	Charsudda	GHS Mardai Sharif NSR	Against V/Po
143	Illyayut ur Rahman	Abdul Hakim	CT GHS Gujrat	MDN	GHS Gujrat Mardan	Against V/Po
144	Abdul Abad	Said Alder	CT. GMS Panjman	Swabi	GHS Inzari NSR	Against V/Po
145	Zahid Shah	Zahir Shah	CT GHS T. Bhal	MDN	GMS Simi NSR	Against V/Po
146	Muhammad Shah	Muroof Shah	CT. GHS Jatorai	Nowshera	GHS Dnk Ismail Khel NSR	Against V/Po
147	Muhammad Aynz	Hoor Muhammad Khan	CT. GHS Mula Kili	Nowshera	GHS Mula Kili NSR	Against V/Po
148	Munir Aldar	Shah Muhammad	CT GMS Janga (L. Jang)	MDN	GHS Khair Abad NSR	Against V/Po

149	Qul Farid Khan	Isa Khan	GHS No 4 Cantt	Peshawar	GMS Bazid Khel Banda Pesh	Against V/Pe
150	Races Khan	Azam Din	PTC. G/S Kwid	Nowshera	GMS Gharibpura NSR	Against V/Pe
151	Muhammad Mohamud	Umar Nawaz	CT GMS But Serai	MDN	GMS Zundo Banda NSR	Against V/Pe

**TERMS AND CONDITIONS OF THEIR APPOINTMENTS.**

- 1 They will be governed by such rules and regulations as may be prescribed from time to time by the Govt. for the category of the Govt. servants to whom they belong.
- 2 Their services will be liable to be terminated on one month's notice from either side. In case of resignation without notice one month pay will be forfeited in lieu thereof.
- 3 They will take over charge within 15 days after **22.08.2003**.
- 4 Their inter-se-seniority will be determined in accordance with the merit fixed by the Departmental Selection Committee.
- 5 They shall be on-probation for a period of two years.
- 6 They shall be required to furnish copies of all their certificates/degrees along with the original receipts photo copies thereof pertaining to the verification fee of the concerned examining body (Board/University) to the EDO (Schools & Literacy)/AEO (Edu:) concerned. The latter shall arrange verification of all the certificates/degrees of the appointee of their respective District/Agency and will issue a clearance certificate to each appointee for the release of his pay. His pay bill should not be submitted to the Accounts Office concerned before verification of all certificates/degrees from the concerned institution of each candidate.
- 7 The Heads of the Institution/DDO must check the service books of the in-service teachers before handing over charge to them.
- 8 Compliance report regarding taking over charge by the appointee within stipulated period should be submitted to this Directorate after **30.9.2003**.
- 9 The Service of newly appointees should be checked whether they had been working on **contract** or **regular** basis before their appointment as SET. In case the in-service teacher working on contract basis and appointed on regular basis against SET post by virtue of this appointment, their order will be null and they will be appointed on contract basis. The EDO (S&L) concerned should immediately inform the Director Schools & Literacy NWFP in this respect.
- 10 No TA/DA etc. is allowed.
- 11 Charge reports should be submitted (in duplicate) to all concerned.

(MUHAMMAD JAMSHED KHAN TANOL  
DIRECTOR SCHOOLS & LITERACY  
NWFP PESHAWAR

File No. 151/A-14/SETs (M&F) Appointments/2003/DSL/AD (Estt-I)

Dated Peshawar, the 24/07/2003.

Encl No. 4385-4711/

Copy forwarded for information and necessary action to the:-

- 1 Minister for Education NWFP.
- 2 Secretary to Govt of NWFP Schools & Literacy Department Peshawar.
- 3 Accountant General NWFP Peshawar.
- 4 Director of Education (FATA) NWFP Peshawar.
- 5 Director Curriculum and Teachers Education NWFP Abbottabad.
- 6 Executive District Officers (S&L) of the Zone concerned.
- 7 District Accounts Officers concerned.
- 8 Section Officer (Schools) Govt of NWFP Schools & Literacy Department w/r to his letter No. SO (S) 3-2/2000. SS(M) dated 03.09.2002.
- 9 Section Officer (General) Govt of NWFP Schools & Literacy Department w/r to his letter No. SO (G)/S&L 1-47/2003 dated 27.6.2003.
- 10 Deputy District Officer (M) concerned.
- 11 Principals/Head Masters concerned
- 12 Candidates concerned.
- 13 PA to Director Schools & Literacy NWFP Peshawar.

(HYDARATULLAH APGHANI)  
ADDITIONAL DIRECTOR ESTAB:  
DIRECTOR SCHOOLS & LITERACY  
NWFP PESHAWAR

08/11  
20/05/04  
850

SSC RA BA BEd MA MBD Service  
20 20 20 20 10 5 1 5 10

7 ANNEX B-6

Dn (SML)

Allegedly junior must  
has been facilitated while  
in or must suffered. PI

The Director,  
Schools & Education,  
N.W.F.P. Peshawar  
Minister for Education

JA  
2/6/11/03

SUBJECT:- APPEAL FOR REVISION OF SENIORITY LIST FOR POST OF S.E.T.

With due respect, it is requested that I have been applied for the S.E.T. Post on Batch-9/10 and also Int.(First) as per cont./interview in the Batch-wise selection 1994 in District Rozohara. As regarding the present appointment order/qualification I submit the following:-

1. Name:- Taj Wali Khan
2. Father's Name:- Buzardar Khan.
3. Zone:- 10.
4. Qualifications:-
  - a) Services:- 15 years on CE. Rank.
  - b) P.S.I. 545/000 Dec: Date: 29-1-1997.
  - c) R.M. 672/1400
  - d) CA. 574/1400
  - e) BA 189/150
  - f) P.H.C. 562/1400
  - g) SSC (Muzung) 550/550

Keeping in view the above <sup>fact</sup> and regarding the present recruiting formula I am justified to claim the S.E.T Post.

It is further requested that my appeal be favourably considered for appointment.

Thanks.

Yours, respectfully,

(Taj Wali Khan)  
B/O Buzardar Khan CE.  
6200 Alora Khattak District  
Rozohara.

Date: 28th/July/2003.

Recd  
7/28/03

J. HANBA-C

# DIRECTORATE OF SCHOOLS & LITERACY NWFP PESHAWAR

## ORDER.

Consequent upon acceptance of appeals and re-allocation of Merit position, weightage, score by the Scrutiny Committee and on the recommendation selection by the Departmental Selection Committee, the Director Schools & Literacy NWFP Peshawar has been pleased to appoint the following S.E. Ex (General/Minor) to UPS-1p on Regular Basis (No. 3303-295-12655) plus usual allowances as admissible under the rules and posted in the schools as noted against their names with immediate effect. However their seniority will be reckoned with effect from 1.9.2003.

S.#	Zone	Name/Father Name	Father's Name	Address	Domicile	Place of Posting	Remarks
1	I	Master Khan	Sajfur Rehman	CT GHS Zoor Bandar Bajour Agency	Bajour Agency		Services place at the disposal of DE (FATA) NWFP for further posting against SET (General) vacant post.
2	II	Mr. Taj Wali Khan	Muqadar Khan	CT GCMHS Akota Khattak Nowshera	Nowshera	SET (Gen) GCMHS Akota Khattak Nowshera	Vacant post
3	II	Mr. Raza Khan	Dilawar Khan	CT GHS Tarnab Charsadda	Charsadda	SET (Gen) GHS Tala Band Peshawar	Vacant post

### TERMS AND CONDITIONS OF THEIR APPOINTMENTS.

- 1 They will be governed by such rules and regulations as may be prescribed from time to time by the Govt. for the category of the Govt. servants to whom they belong.
- 2 Their services will be liable to be terminated on one month's notice from either side. In case of resignation without notice one month pay will be forfeited in lieu thereof.
- 3 They will take over charge within one month.
- 4 Their seniority will be determined in accordance with the merit fixed by the Departmental Selection Committee.
- 5 They shall be on probation for a period of two years.
- 6 They shall be required to furnish copies of all their certificates/degrees along with the original receipts and photo copies thereof pertaining to the verification fee of the concerned examining bodies (Board/University) to the EDO (Schools & Literacy) A/D (I/d) concerned. The latter shall arrange verification of all the certificates/degrees of the appointee at their respective District Agency and will issue a clearance certificate to each appointee for the release of his pay. His pay bill should not be submitted to the Accounts Office concerned before verification of all certificates/degrees from the concerned institution of each candidate.
- 7 The Heads of the Institution/DDO must check the service books of the in-service teachers before handing over charge to them.
- 8 Compliance report regarding taking over charge by the appointee within stipulated period should be submitted to this Directorate after one month.
- 9 The Service of newly appointees should be checked whether they had been working on contract or regular basis before their appointment as SET. In case the in-service teacher working on contract basis and appointed on regular basis against SET post by virtue of this appointment, their order will be revised and they will be appointed on contract basis. The EDO (S&L) concerned should immediately inform the Director Schools & Literacy NWFP in this respect.
- 10 No FADA etc. is allowed.
- 11 Charge reports should be submitted (in duplicate) to all concerned.

(MUHAMMAD JAMSHED KHAN TANOLI)  
DIRECTOR SCHOOLS & LITERACY  
NWFP PESHAWAR

File No. 151/A-14/SETs (M&F) Appointments/2003/DSL/AD (Estt-1)

Form No. 4411-28

Dated Peshawar the 29/9/2003.

- Copy forwarded for information and necessary action to the.
- 1 Minister for Education NWFP
  - 2 Secretary to Govt of NWFP Schools & Literacy Department Peshawar
  - 3 Director of Education (FATA) NWFP Peshawar
  - 4 Executive District Officers (S&L) of the Zone concerned
  - 5 District Account Officers concerned
  - 6 Section Officer (S&L) Govt of NWFP Schools & Literacy Department Peshawar.
  - 7 Section Officer (S&L) Govt of NWFP Schools & Literacy Department Peshawar
  - 8 Principals/Head Masters concerned
  - 9 Candidates concerned
  - 10 Bmt. C. I. I.

(JAMSHED KHAN)  
DEPUTY DIRECTOR SCHOOLS & LITERACY  
NWFP PESHAWAR

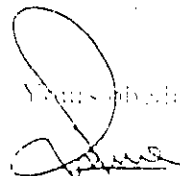
9 Answer D<sup>th</sup>

The Director of Schools & Literacy,  
K/Pukhtoonkhawa Peshawar.

Sub: Application for correction in SET Seniority List (2010)  
(Through proper channel)

Respected Sir,

It is stated for your kind consideration that I am working as teacher in the capacity of Khiner Pukhtoonkhawa Education Deptt. Since 12-01-1988. I took over the charge as SET on 01-9-2003. According to the corrigendum order of 28.7.2003. But my name is not included in the current tentative SET seniority list of 2010. It is therefore requested that the deficiency may please be compiled in the ultimate list. Necessary documents are hereby attached with the application.

Yours obediently,  
  
Taj Wali Khan  
SET, GCMHS,  
Akora Khattak.

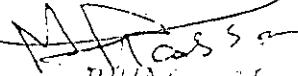
Dated: 28.7.2010.

Forwarded to the EDD S&L (W&R) for further necessary action please.

File No. 1730

Dated

29/7/2010

  
M. Hassan  
PRINTED  
G.C.M.H.S.  
(Akora Khattak, W&R)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the 28-03-2013

NOTIFICATION

No. SO(PE)E&SED/2-6/DPC/Meeting(06-01-2014). On the recommendations of the Departmental Promotion Committee, the Competent Authority is pleased to upgrade the following Male/Female SETs from BS-16 to BS-17 as Personal to the incumbents with immediate effect :-

UP-GRADATION OF SETS (MALE) BS-16 TO BS-17 (PERSONAL).

S.#	S.L.#	Name of Officer & Present Place of Posting
1.	2448 FSL-13	Muhammad Akhtar SET GHS Khushala Mansehra
2.	2633 FSL-13	Sharaf ud Din SET GHS Lonkuh Chitral
3.	3090 FSL-13	Raziq Shah SET GHS Said Azam Killi FR Peshawar
4.	3142 FSL-13	Muhammad Ismail Khan SET GHS Gulbahar No.2 Peshawar
5.	3178 FSL-13	Jangraiz Khan SET GHS Civil Quarter Peshawar
6.	3279 FSL-13	Hamid Ullah Khan SET GHS Bahadin Khel Karak
7.	3401 FSL-13	Mutabar Khan SET GMS Hayat Khel Lakki
8.	3403 FSL-13	Muhammad Sahib SET GMS Myanki Karak
9.	3404 FSL-13	Wazir Zaman SET GHS Makoori Karak
10.	3406 FSL-13	Maqbool Ahmad SET GHSS Shah Salim Karak
11.	3408 FSL-13	Qadir Nawaz Khan SET GHS Sikandar Khel Bala Bannu
12.	3412 FSL-13	Wali Ayaz Khan SET GHS Dheri Sydan Bannu
13.	3413 FSL-13	Meharban Khan SET GHS Nurpur Haripur
14.	3414 FSL-13	Saif Ullah Khan SET GHS Ahmad Khel Lakki
15.	3415 FSL-13	Zafar Khan SET GHS Zangi Khel Lakki
16.	3416 FSL-13	Sher Ali Khan SET GMS Gandi Umar Chikar Lakki
17.	3421 FSL-13	Muhammad Ayub Khan SET GHS Khero Khel Pacca Lakki
18.	3424 FSL-13	Muhammad Wali Shah SET GMS Abdul Qadir Shah Mandan Bannu
19.	3425 FSL-13	Riaz Ali Shah SET GHS Mama Khel Lakki
20.	3426 FSL-13	Sher Ali Khan SET GHS Kiri Dhand Karak
21.	3427 FSL-13	Noor Qadir Shah SET GMS Jarasi Karak
22.	3428 FSL-13	Muhammad Ali SET GHS Tabbi Murad Lakki
23.	3430 FSL-13	Abdul Matin SET GMS Wanda Jogi Pezu Lakki
24.	3431 FSL-13	Mir Qadar Khan SET GHSS Ismail Khel Bannu
25.	3432 FSL-13	Abdul Saboor Khan SET GGHS Jehangiri Karak
26.	3433 FSL-13	Afsar Ali Khan SET GHSS Kakki Khel Bannu
27.	3434 FSL-13	Muhammad Tariq SET GHS Ziarat Sheikh Allah Dad Kohat
28.	3435 FSL-13	Hajbat Ali Khan SET GHSS Kat Garh Di Khan
29.	3436 FSL-13	Nisar Ahmad SET GHS Gandheri Khattak Karak



270.	3761 FSL-13	Haris Ullah SET GIS Bagan Kurr. Agy
271.	3762 FSL-13	Muhammad J Shahbaz Khan SET GHSS No.1 Peshawar City
272.	3763 FSL-13	Muhammad Zaman SET GIS Bakki Mansehra
273.	3764 FSL-13	Shabir Ahmad SET GCMS No.3 Mansehra
274.	3765 FSL-13	Muhammad Nabi SET GMS Hamza Khan Mardan
275.	3768 FSL-13	Nasir Ahmad SET GIS Tajwal Abbottabad
276.	3769 FSL-13	Hakim Khan SET GHS Chandoor Mansehra
277.	3772 FSL-13	Mir Salam SET GMS Janoor Warmi Khel FR Bannu
278.	3773 FSL-13	Javed Khan SET GMS Uabral Mansehra
279.	3774 FSL-13	Syed Fazal Hussain SET GIS Pekar Kurr. Agy
280.	3775 FSL-13	Muhammad Saeed SET GMS Matihal Mansehra
281.	3776 FSL-13	Muhammad Zubair Khan SET GM Chiri Kot Mansehra
282.	3777 FSL-13	Danat Khan SET GIS Sararogha SWA
283.	3778 FSL-13	Roshan Zamir SET GHS LC Aman Garh Nowshera
284.	3779 FSL-13	Syed Shah Luqman SET GHS Atter Shisha Mansehra
285.	3780 FSL-13	Fazad Ullah SET GMS Issorie Mirali NWA
286.	3780 FSL-13	Nasruminallah SET GIS Shara Shabqadar
287.	3781 FSL-13	Sher Nawab SET GIS Mirpur Abbottabad
288.	3782 FSL-13	Mehboob ur Rehman SET GHS Jab Haripur
289.	3785 FSL-13	Abdur Raziq SET GHS Katlang Mardan
290.	3787 FSL-13	Abdul Hakeem SET GIS Nathia Gali Abbottabad
291.	3788 FSL-13	Muhammad Asif Iqbal SET GCMHS Akora Kattak ✓
292.	3789 FSL-13	Abdul Majeed SET GHS Jaroba Nowshera
293.	3792 FSL-13	Sajjad Ali SET GMS Nawan Killi Charssada
294.	3793 FSL-13	Muhammad Iqbal SET GIS Takia Sheikhian Abbottabad
295.	3795 FSL-13	Wali ur Rehman SET GHS No.4 Abbottabad
296.	3796 FSL-13	Abdur Rehman SET GIS No.2 Havelian Abbottabad
297.	3797 FSL-13	Muhammad Latif SET GMS Kotkay Mansehra
298.	3798 FSL-13	Ashraf Ali SET GIS No.1 Rajjar Charssada
299.	3799 FSL-13	Hidayat ur Rehman SET GMS Marghano Killi Mardan
300.	3800 FSL-13	Muhammad Sabir SET GHS No.1 Havelian Abbottabad
301.	3802 FSL-13	Zahid Shah SET GHSS Takht Bhai Mardan
302.	3803 FSL-13	Muhammad Zaman SET GIS Chapri Lower Kurr. Agy
303.	3804 FSL-13	Mukadam Shah SET GHS Dak Ismail Khel Nowshera
304.	3805 FSL-13	Muhammad Ayaz SET GMS Saadat Abad Nowshera
305.	3806 FSL-13	Munir Akhtar SET GMS Janga Lund Khwar Mardan
306.	3807 FSL-13	Sheer Ali SET GMS Boya NWA
307.	3808 FSL-13	Gul Farid Khan SET GIS PAF Shabeen Camp Peshawar Cantt
308.	3809 FSL-13	Hasin Khan SET GIS Ahmad Wam SWA
309.	3810 FSL-13	Muhammad Riaz GMS Sam Wala Abbottabad



13

6/2

149.	1333-A FSL-13	Nighat Ara SET GGHS Mayar Mardan
150.	1333-B FSL-13	Fehsida Zarin SET GGHS No.1 Lakki
151.	1333-C FSL-13	Rahat Mahjabeen SET GGHS Hattar Haripur
152.	1333-D FSL-13	Shahida Iqbal SET GGHS Noordi Haripur
153.	1342 FSL-13	Rahat Mahjabeen SET GGHS No.1 Kohat City

Endst. No. & date as above.

SECRETARY

Copy forwarded to:

1. The Additional Chief Secretary (FATA), FATA Secretariat Warsak Road Peshawar.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
4. The Accountant General Khyber Pakhtunkhwa, Peshawar.
5. PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. The Director Education FATA, Warsak Road, Peshawar.
8. The Director Curriculum & Teachers Education, Abbotabad.
9. The Director ESRU, Khyber Pakhtunkhwa.
10. The District Education Officers, Elementary & Secondary Education concerned.
11. The District Accounts Officers concerned.
12. PS to Secretary E&SE Department.
13. SETs concerned.
14. Office File.

ZAMIN KHAN MOMAND  
SECTION OFFICER (PRIMARY)

28/08/2014

خدمت جناب ڈائریکٹر صاحب سول انڈسٹریز ڈیپارٹمنٹ خیبر پختونخوا پشاور

مضمون :- درخواست برائے تصحیح سیناریائی نمبر اپ گریڈیشن کیس (B-16 سے B-17) جناب عالی!

عرض ہے کہ 2003 میں ایس ای ٹی جنرل آرڈر میں میرا نام میرا ای ڈائریکٹ کے متعلقہ عمل کی غلطی کی وجہ سے رہ گیا تھا حالانکہ اس وقت دفتر کے طریقہ کار اور ڈسٹریکٹ کے مطابق میں منبغ نیشنل میں اول غیر یز تھا لیکن بعد میں میرے بعد دوسرے نمبر پر امتیاز قبول Co. Merger بھی ہے وہ ہو گیا تھا اور مجھے نظر انداز کر دیا گیا تاہم بعد میں درخواست دائر کرنے پر میری بیٹری ایس ای ٹی تقرری کا آرڈر اسی تاریخ سے کیا گیا جو دوسرے جنرل آرڈر والوں کی بھی تھا یعنی 2003/01 تاہم ایسی تصحیح سیناریائی لسٹ میں نہیں آئی جیسا علم اب موجود ہے B-16 سے B-17 کی اپ گریڈیشن لسٹ سے ہوا کہ وہی مذکورہ امتیاز (AMFA) قبول SET ایسٹ کے پانچ کے لحاظ سے تو میرے ساتھ برابر ہے لیکن سروس کے لحاظ سے اور بنیادی تنخواہ کے لحاظ سے مجھے جو نیٹو ہے وہ بھی اسکا نام سیریل نمبر 291 پر 13-FSL-3788 ہے جبکہ میرا نام سیریل نمبر 568 پر 13-HFSL-4136 ہے جو کافی پیچھے آتا ہے اور آئے والے اوقات میں میرے لیے نقصان دہ ثابت ہو سکتا ہے

میری فرسٹ ایروائٹمنٹ 12-01-1988 اور موجودہ بنیادی تنخواہ 26800/- ہے

مذکورہ امتیاز کی ایروائٹمنٹ 09-12-1989 اور موجودہ بنیادی تنخواہ 23600/- ہے

اس بارے میں درخواست کی جاتی ہے کہ ہرگز میرا بنیادی مذکورہ غلطی کی تصحیح کے احکامات صادر فرمائے جائیں

میں آپ کا بے حد مہنہ و محنت کو سراہتا ہوں اور دعا گو رہتا ہوں

الحافظ قیام خان ایس ایس ٹی سی ایم ایچ ایس او گڑھ ضلع (گنڈاپور) منسلک دستاویزات

(۷) سکول سٹاٹس سرٹیفکیٹ کی کاپی (۷) بے ساری کی کاپی

تاریخ میری SET ایسٹ 2003 کی آرڈر کاپی (۱۱) میری ۰۷ کی کاپی

صفحہ ۱/۱/2014

ڈائریکٹر سول انڈسٹریز ڈیپارٹمنٹ ۱۶/۱/2014



15 Annex "G"  
OFFICE OF THE  
DISTRICT EDUCATION OFFICER (MALE)  
NOWSHERA

(Office Phone#0923-9220228, Fax#0923-9220228)

No. 257 /EDO (E&SE)NSR/ACR,s/ Dated Nowshera the 27/08/2014.

To,

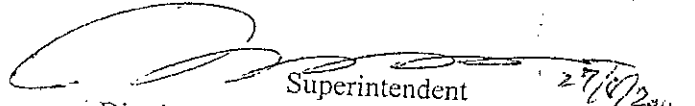
The Director,  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

Subject : APPEAL FOR CORRECTION OF SENIORITY LIST

Memo,

Enclosed please find herewith original application along with other necessary documents in respect Mr. Taj Wali Khan SST, GCMHS Akora Khattak (Nowshera) (which is self-explanatory) for correction of seniority list ~~is submitted~~ for further necessary action.

Encl: As above.

  
Superintendent  
District Education Officer (M)  
Nowshera  
27/08/2014

The Director (E&SE) K.P.K.  
Peshawar.

Subject: Application for the Correction of Seniority No. in the up gradation case BS-16 to BS-17  
(No. SO(PE) E&SE/2-6/DPC/Meeting (06.01.2014)

(Through Proper Channel)

R/Sir,

Regretted to say that I have been victimize twice by the blunders of the requested office i.e.

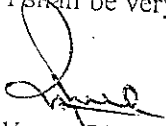
1. Once during my batch wise appointment on SET post in 2003, I was ignored and another teacher named Asif Iqbal who is my colleague too was availed, inspite of the fact that I was at S.No.1 in district Nowshera securing 59.25 marks according to the criteria for appointing at that time while the said teacher has secured round about 56 marks. He later on my appeal I was appointed from the date as other SETs of my batch but the error was maintained.
2. Secondly now in the up gradation case from B-16 to B-17 dated 24.03.2014 the same error is repeated and the same teacher is given Seniority No. 3788- FSL-13 while I am given the No. 4136- HFSL- 13 inspite of the fact that my first appointment is 12.01.1988 and the said teacher has the first appointment as 09.12.1989.

According to the P&D Establishment services rules of 1973 and fundamental rights I am deserved to be senior in this case.

Keeping in view the above mentioned informations my case may please be given kind consideration in order to avoid me from any judicial prosecutions.

I have already submitted an application in this regard to the honourable office on 14-4-2014 D.No. 804 but no official response is shown still.

I shall be very thankful to you and pray for you for solving my problem.

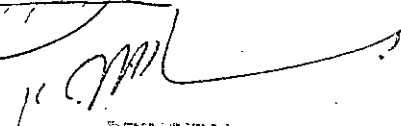
  
Yours Obediently,

Dated : 07.07.2014

Taj Wali Khan (SST)  
GCMHS Akora khattak.  
(Nowshera)

*Forwarded to the DBO (M) E&SE NSR for further necessary action pl.*  
*No. 2025*

*Dated: 07/07/14*

  
PRINCIPAL  
Govt. Centennial Model High School  
Akora Khattak

17

④


CRITERIA FOR APPOINTMENT ON SET POST IN 2003 ( BATCH WISE)

DISTRIBUTION OF MARKS

SSC	FA/FSC	BA/BSC	B.Ed	M.Ed	MA	Service
20	20	20	20	05	10	05

My score according to the criteria

SSC	$554/850 \times 20 = 13.04$
F.SC	$552/1100 \times 20 = 10.04$
BA	$272/550 \times 20 = 9.89$
B.Ed	$585/90 \times 20 = 13$
M.Ed	$673/1100 \times 5 = 3.06$
MA	$574/1100 \times 10 = 5.22$
Service	..... = 05
Total	..... = 59.25



Taj Wali Khan (SST)  
GCMHS Akora khattak.  
(Nowshera)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the 17-03-2016

18  
ANNEX "H"

NOTIFICATION

No.SO(PE)/2-6/DPCMmeeting/SST-SS (20/10/2015): On the recommendations of the Departmental Promotion Committee, the Competent Authority is pleased to promote the following Seven Hundred and Thirty Seven (737) Male SSTs (BS-16) to the post of Subject Specialist (BS-17) on regular basis with immediate effect:-

S#	S# in Subject	SL#	Name and Qualification	Present school Address	Proposed Station	Remarks
1	1	746	Sikandar Khan	GHS Pakhs, Ghulam Peshawar	SS B-17 (Biology) GHSS Telikal Bala Peshawar	Against vacant post
2	2	1370	Zeenat Ullah SET MSc BEd	GHS Miha Khel Karak	SS B-17 (Biology) GHSS Dabli Lawaghar Karak	Against vacant post
3	3	1813	Mr Sultan Farooq, SET	GHS Sarwar Jan Bala Khel ER Bannu	Services placed at the disposal of Director Education FATA	Against vacant post
4	4	1871	Mr Akhtar Nawaz Khan MSc MEd	GCMHS Turbela Township Haripur	SS B-17 (Biology) GHSS Jatti Pind Haripur	Against vacant post
5	5	2751	Mr, Muhammad Fayaz Shah SET	GHS Rashakai Nowshera	SS B-17 (Biology) GHSS Rashakai, Nowshera	Against vacant post
6	6	2768	Mr, Yousaf Zaman, SET	GHS Jan Killa Bannu	SS B-17 (Biology) GHSS Nari Panoos, Karak	Against vacant post
7	7	2775	Mr, Bakht Baidar, SER	GHSS Barikot Swat	SS B-17 (Biology) GHSS Kishwara, Swat	Against vacant post
8	8	2799	Mr, Junat Gul, SET	GHSS Khanpur Dir Lower	SS B-17 (Biology) GHSS Asban Dir Lower	Against vacant post
9	9	2894	Mr, Bakht Ali Shah, SET	GHSS Seral Naurnag Lakki	SS B-17 (Biology) GHSS Abdul Khel, Lakki	Against vacant post
10	10	2965	Muhammad Altaf ur Rehman SET MSc BEd	GHS Dhinda Haripur	SS B-17 (Biology) GHSS Beer Haripur	Against vacant post
11	11	3063	Bukhar Ali Shah S/O Zardad Khan MSc MEd Bannu	GHS Tour Bara Khel Bannu	SS B-17 (Biology) GHSS Chorlaki, Kohat	Against vacant post
12	12	3302	Amir Alara Khan S/O Gul Muhammad Dir, MSc, BEd	GHS Hathian Mardan	SS B-17 (Biology) GHSS Fir Saddi Mardan	Against vacant post
13	13	3858	Fazil Subhan s/o Gul Khan, MSc, MEd	GHS Tall Swat	SS B-17 (Biology) GHSS Tall Swat	Against vacant post
14	14	4138	Syed Asif Hussain Shah SET MA BEd	GHS Talhata, Mansehra	SS B-17 (Biology) GHSS Doga, Mansehra	Against vacant post
15	15	4554	Sojid Hussain SET BA/B.Ed	GHS Chakurkot Kot Bala, Kohat	SS B-17 (Biology) GHSS Landi Kachi, Kohat	Against vacant post
16	16	4558	Mehboob Alam SET M.Sc/MEd	GHS Kot Kashaur Lakki	SS B-17 (Biology) GHSS Shalbaz Khel Laki Marwat	Against vacant post
17	1	520	Nasrullah BA BEd	GHS Mandawa Karak	SS B-17 (Chemistry) GHSS Kapdu Khel Karak	Against vacant post
18	2	534	Liaqat ali MSc BEd	GHS Khezana Dheri Mardan	SS B-17 (Chemistry) GHSS Mahabat Abad, Mardan	Against vacant post
19	3	564	Ihsanul Haq MSc BEd	GHS Shergarh Mardan	SS B-17 (Chemistry) GHSS Shergarh, Mardan	Against vacant post
20	4	569-A	Muhammad Iqbal SET MSc MEd	GHS Ouch, Dir Lower	SS B-17 (Chemistry) GHSS Chakara, Dir Lower	Against vacant post
21	5	579	Zamrullah MSc BEd	GHS Soor Kanak, Jannrud Khyber Agency	SS B-17 (Chemistry) GHSS Shah Saleem Karak	Against vacant post



518	47	3190	Salch Amin S/O Sherin Khan MA MEd	GHS Kozpaw Shangla	SS B-17 (Hist cum Civics) GHSS Chawga, Shangla	Against vacant post
519	48	3205	Hamid Ullah SET MA B.Ed	GHS Bahadar Khel Karak	SS B-17 (Hist cum Civics) GHSS Dabli, Lawaghar, Karak	Against vacant post
520	49	3206	Muhammad Riz S/O Mian Khan (Haripur)	GHS Panian Haripur	SS B-17 (Hist cum Civics) GHSS Jatti Pind, Haripur	Against vacant post
521	50	3262	Abdul Samad S/O Azmat Khan Karak	GHS Soorai Kala Karak	SS B-17 (Hist cum Civics) GHSS Kandu, Khel Karak	Against vacant post
522	51	3268	Khurshid Alam s/o Ali Rehman MA MEd Bannu	GHS Jan Kala Bannu	SS B-17 (Hist cum Civics) GHSS Mohammad Zai, Kohat	Against vacant post
523	52	3289	Arshad Mahmood Saifi S/O Muhammad Shah Moh. Agy	GHS Subhan Khwar M. Agency	Services placed at the disposal of Director Education FATA	Against vacant post
524	53	3324	Mr. Ijaz, MA MEd SET	GHS Babara Charsadda	SS B-17 (Hist cum Civics) GHSS Nisatta, Charsadda	Against vacant post
525	54	3369	Shabir Ahmad SET BA Bed	GHS Kot Atal D.I.Khan	SS B-17 (Hist cum Civics) GHSS Katgarh, D.I.Khan	Against vacant post
526	55	3379	Faiz ur Rehman SET MA M.Ed	GHS Nanda Madat D.I.Khan	SS B-17 (Hist cum Civics) GHSS Palarpur, D.I.Khan	Against vacant post
527	56	3398	Rehmat Ullah SET MA B.Ed	GHS Mataro Lakki	SS B-17 (Hist cum Civics) GHSS Kotjal, D.I.Khan	Against vacant post
528	57	3405	Safer Ullah Khan SET MA B.Ed	GMS Sikandar Barak Bannu	SS B-17 (Hist cum Civics) GHSS Ibrimbizai, Hangu	Against vacant post
529	58	3444	Muhammad Subhan SET MA M.Ed	GHS Batta Manschra	SS B-17 (Hist cum Civics) GHSS Batta, Manschra	Against vacant post
530	59	3587	Muhammad Younis SET MA (Edu)	GHS Garhi Habibullah Manschra	SS B-17 (Hist cum Civics) GHSS Jabori, Manschra	Against vacant post
531	60	3597	Muhammad Saeed Akhtar SET MA (Edu)	GHS No.1 Manschra	SS B-17 (Hist cum Civics) GHSS Trippi, Manschra	Against vacant post
532	61	3651	Muhammad Saeed SET MA (Edu)	GMS Batta Manschra	SS B-17 (Hist cum Civics) GHSS Parhina, Manschra	Against vacant post
533	62	3703	Muhammad Asif Iqbal SET MA M.Ed	GCMS Akora Khattak Nowshera	SS B-17 (Hist cum Civics) GHSS Roshakai Nowshera	Against vacant post
534	63	3782	Ameer Khan SET MA M.Ed	GHSS Wazir Begh Peshawar	SS B-17 (Hist cum Civics) GHSS Dargal, Charsadda	Against vacant post
535	64	3797	Muhammad Fayaz SET MA M.Ed	GHS No.2 Peslawar Cantt	SS B-17 (Hist cum Civics) GHSS Sufaid Sang, Peshawar	Against vacant post
536	65	3798	Saleem Ullah Khan MA M.E	GHS Hassan Khel Bannu	SS B-17 (Hist cum Civics) GHSS Kot Jay, D.I.Khan	Against vacant post
537	66	3832	S.Arshad Hussain Shah SET MA M.Ed	GHS Gujrat Mardan	SS B-17 (Hist cum Civics) GHSS Bagbicha, Dheri, Mardan	Against vacant post
538	67	3986	Dafar Khan SET MA B.Ed	PAEO FR Bannu	Services placed at the disposal of Director Education FATA	Against vacant post
539	68	3990	Muhammad Davd SET MA M.Ed	GHS Haripur	SS B-17 (Hist cum Civics) GHSS Beer, Haripur	Against vacant post
540	69	3991	Shahid Hussain SET MA M.Ed	GHS Parachinar K. Agency	Services placed at the disposal of Director Education FATA	Against vacant post
541	70	4073	Rehman Janna SET MA M.Ed	GHSS Dallah Hangu	SS B-17 (Hist cum Civics) GHSS Dallah, Hangu	Against vacant post
542	71	4106	Barkat Shah SET MA M.Ed	GHS S.K.Bala Bannu	SS B-17 (Hist cum Civics) GHSS Abdul Khel, D.I.Khan	Against vacant post
543	72	4196	Muhammad Mazhar SET MA M.Ed	GHS Zaryab Colony Peshawar	SS B-17 (Hist cum Civics) GHSS Adizai, Peshawar	Against vacant post

*Rasul*

602	5	1983	Mr. Ijaz Khan MSc BEd	GHS Boza Khel Bannu	SS B-17 (English) GHSS Salfra Sikandar Khel, Bannu	Against vacant post
603	6	2095	Mr. Mushtaq Ahmad MA MEd SET	GHS Nokot Manschra	SS B-17 (English) GHSS Phulra, Manschra	Against vacant post
604	7	2504	Mr. Abid Zaman, SET	GHSS Fir Piai Nowshera	SS B-17 (English) GHSS Ziarat Kaka Sahib, Nowshera	Against vacant post
605	8	2529	Mr. Younas Khan SET	GMS Nowshera Amangarh	SS B-17 (English) GHSS Akbar Pura, Nowshera	Against vacant post
606	9	2697	Mr. Mahmood MA MEd SET	GHSS Sama Badaber, FR Peshawar	Services placed at the disposal of Director Education FATA	Against vacant post
607	10	2748	Mr. Nisar Ahmad SET	GMS Charikha Khel Peshawar	SS B-17 (English) GHSS Hazackhwani, Peshawar	Against vacant post
608	11	2937	Mr. Sabz Ali Khan SET	GHS Khazana Dheri Mardan	SS B-17 (English) GHSS Mubabbat Abad, Mardan	Against vacant post
609	12	3062	Javed Iqbal S/O Malik Suba Khan/D.I.Khan	GHS Nuiyela D.I.Khan	SS B-17 (English) GHSS Kurai, D.I.Khan	Against vacant post
610	13	3086	Subhan Ullah SET MA MEd	GHSS No.3 Peshawar City	SS B-17 (English) GHSS GCMHSS No.2 Peshawar City	Against vacant post
611	14	3105	Fazal Khalig S/O Muhammad Amin Swat	ADEO Swat	SS B-17 (English) GHSS Baloigram Swat	Against vacant post
612	15	3174	Zahidur Rehman S/O Amir Rehman MA MEd	GHS Shewa Swabi	SS B-17 (English) GHSS Mansabdar, Swabi	Against vacant post
613	16	3179	Izhar Ahmad S/O Rahim Khan Mardan	GHS Jaran Garhi Mardan	SS B-17 (English) GHSS Gaddar, Mardani	Against vacant post
614	17	3184	Nudccm Khan s/o Arzumand Khan MA MEd Dir (L)	GHS Siawarghar, Dir Lower	SS B-17 (English) GHSS Khanpur, Dir Lower	Against vacant post
615	18	3233	Farid Ullah Khan S/O Akbar Ali Bannu S	GHS Badhar Peshawar	SS B-17 (English) GHSS Adezai, Peshawar	Against vacant post
616	19	3775	Muhammad Nisar MA MEd	GHS Ghani Kor, Mohmand Agency	Services placed at the disposal of Director Education FATA	Against vacant post
617	20	3810	Azizar Rehman SET MA MEd	GHS Gwalera Swat	SS B-17 (English) GHSS Deolai, Swat	Against vacant post
618	21	4056	Taj Wali Khan SET MA MEd	GCMHS Akora Khattak Nowshera	SS B-17 (English) GHSS Jabbi Nowshera	Against vacant post
619	22	4077	Dilawar Khan SET MA B.Ed	GHS Garang Siraj Khel Karak	SS B-17 (English) GHSS Kandu Khel Karak	Against vacant post
620	23	4104	Muhammad Nawaz SET MA B.Ed	AASO Khyber Agency Jamrud	Services placed at the disposal of Director Education FATA	Against vacant post
621	24	4105	Kaleem Ullah SET MA MEd	GHS Dhandi Wazir Bannu	SS B-17 (English) GHSS Landiwah Lakki	Against vacant post
622	25	4139	Abdul Majid SET MA MEd	GHS MM Pole Manschra	SS B-17 (English) GHSS Pauran, Manschra	Against vacant post
623	26	4143	Abdur Rehman SET MSc M.Ed	GHS Khwaza Khela Swat	SS B-17 (English) GHSS Kishwara, Swat	Against vacant post
624	27	4150	Mubammad Yabeem SET MA MEd	GHS No.1 Tordher, Swabi	SS B-17 (English) GHSS Jehangira Swabi	Against vacant post
625	28	4182	Fida Hussain SET MA B.Ed	GHS Ramora, Dir Lower	SS B-17 (English) GHSS Khar Malakand	Against vacant post
626	29	4192	Ali Shah s/o Sher Zada SET MA MEd	GHSS Char Bugh Swat	SS B-17 (English) GHSS Dherai, Swat	Against vacant post
627	30	4198	Wajid Ali SET MA MEd	GHS Ghanool Manschra	SS B-17 (English) GHSS Jared, Manschra	Against vacant post
628	31	4210	Abdul Masjan, MA MEd SET	GHSS Barikot Swat	SS B-17 (English) GHSS Kabal, Swat	Against vacant post
629	32	4249	Khad must, SET BA B.Ed	GHS Kohi Hassan Khel FR Peshawar	Services placed at the disposal of Director Education FATA	Against vacant post
630	33	4251	Sarfraz Khan SET	GHS Gali Amizai Haripur	SS B-17 (English) GHSS Jati Pind, Haripur	Against vacant post

Rasul Khan

733	99	2143	Mr. Fakhrul Hassan SET	GHS W/Shahab Khel Lakki Marwat	SS B-17 (Islamiyat) GHSS Masha Mansoor L/Marwat	Against vacant post
734	100	2157	Mr. Muhammad Ayaz SET	GHSS S.K. Bala Bannu	SS B-17 (Islamiyat) GHSS Kachi Mali Khel, D.I. Khan	Against vacant post
735	101	2203	Usman Ali Khan SET BA BED	GHS No.3 Bannu	SS B-17 (Islamiyat), GHSS Mandran Kalan, D.I. Khan	Against vacant post
736	102	2235	Mr. Abdul Malik SET	GHSS Shergarh Mardan	SS B-17 (Islamiyat) GHSS Shergarh Mardan	Against vacant post
737	103	2238	Mr. Shah Pasand Khan SET	GHS Mohabbat Abad Mardan	SS B-17 (Islamiyat) GHSS Mohabbat Abad, Mardan	Against vacant post

2. On their promotion, the Subject Specialist concerned will be on probation for a period of one year in terms of Section 6(2) of NWFP Civil Servant Act, 1973 read with Rule 15(1) of the NWFP Civil Servant (Appointment, Promotion & Transfer) Rules, 1989.

3. No. TA /DA allowed.

Endst. No. & date as above.

SECRETARY

Copy to:

1. The Additional Chief Secretary (FATA), FATA Secretariat Warsak Road Peshawar.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
4. The Accountant General Khyber Pakhtunkhwa, Peshawar.
5. PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. The Director Education FATA, Warsak Road, Peshawar.
8. The Director Curriculum & Teachers Education, Abbottabad.
9. The Director ESRU, Khyber Pakhtunkhwa.
10. The Deputy Director (EMIS), E&SE Department, with the request to upload the notification of E&SE Department website.
11. The District Education Officers, Elementary & Secondary Education concerned.
12. The District Accounts Officers concerned.
13. PS to Secretary E&SE Department.
14. Subject Specialist concerned.
15. Office File.

*Rasul Khan*  
SECTION OFFICER PRIMARY

*Rasul Khan*

Approved I  
AA

To

The Secretary  
E & SE Department KPK.  
Peshawar.

Sub: Application for correction of Seniority Number in the General Seniority List SST-SS

Respected Sir,

It is humbly stated for your kind consideration that my seniority number may please be corrected, which could not be corrected from a long time in spite of my frequent verbal and written reminders to the office of the honourable director E & SE. Peshawar. I suffered this problem due to the following reasons.

First of all, during my batch wise appointment on SET post in 2003. I was ignored and another teacher named Asif Iqbal who was my colleague too was availed, although I was prior to him in the then prepared list for appointment securing 59.25 score versus 56 round about. However on my appeal I was appointed from the date as other SETs my batch. (Copies attached at page 1,2,3 & 4).

Secondly my name was not included in the tentative seniority list of SETs prepared in 2010. Again I appealed for the correction of error and completion of deficiency in the ultimate list. (copy attached at page 5).

Thirdly in the upgradation case B-16 to B-17 dated 24.03.2014. The same error was repeated i.e. the same teacher Asif Iqbal was given seniority No 3788-FSL-13 while I was given the No 4136-HFSL-13 inspite of the fact that both of us took over the charge of SET post on the same date i.e 01.9.2003 but my first appointment date is 12.01.1988 versus 09.12.1989. (Copy attached at page 6).

I applied for the correction and visited the office of the honourable director repeatedly in this regard. I had brought the matter in the notice of the honourable Dy Director and Additional Director too. (Copies of three applications are attached at page 7, 8 & 9).

I was assured that the error will be corrected in the promotion of SS cases. Now that I have been promoted to SS (English) in the order issued on 17.03.2016. The same error exists in the seniority No i.e. my seniority No is 4056 while the said teacher has the No 3703. (Copies attached at page 10, 9, 10 & 11).

It is therefore requested that I may please be helped in this matter and my problem may please be solved to avoid me from further complications.

I shall be very thankful to you and pray to you for this act of kindness.

Yours Obediently,

Taj Wali Khan SS (Eng.).  
GHSS. Jabbi (NSR).

Copy to Director E&SE. Peshawar.

*[Handwritten signature]*

4/4/16

AS to  
see  
176  
4/4/2016

Approved: J  
 23

TENTATIVE SENIORITY LIST OF SUBJECT SPECIALISTS/HEAD MASTERS MALE (B-17) OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA PESHAWAR STOOD ON 31-12-2016

SR.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st Entry in Edu; Deptt;	Reg. Date	Grade	Method	Designation/Place of Posting	Remarks
1	Shur Alzai MA B.Ed	20/05/1957	Dur Lower	02/12/1976	08/11/1995	17	By Promotion	HM GIS Dalmabat Dk (L)	
2	Nazir Ahmad, B.A B.Ed	27/06/1980	Abbottabad	12/12/1985	08/11/1995	17	By Promotion	HM GIS Carni Noorpur	
3	Hanin Shah M.A B.Ed	15/01/1964	Kohat	29/06/1967	30/08/1997	17	By Promotion	HM GIS Surath Kila Karak	
4	Mumtaz Gul M.A B.Ed	01/06/1966	Kohat	05/09/1999	25/11/1999	17	By Promotion	SS GHSS Ustozal Kohat	
5	Ajmal Khan M.Sc B.Ed	28/04/1971	Mardan	05/07/1999	05/07/1999	17	By Promotion	SS GHSS Baghicha Dheri Mardan	
6	S. Ashfaq Ali Shah M.A B.Ed	18/12/1966	Nowshera	17/02/2000	17/02/2000	17	By Promotion	SS HGSS Bagnotar Abbottabad	
7	Multan Ullah M.A B.Ed	05/01/1971	Swabi	25/11/1999	25/11/1999	17	By Promotion	SS GHSS Kabgan Swabi	
8	Muhammad Fiaz M.A B.Ed	14/11/1968	Haripur	03/07/1999	03/07/1999	17	By Promotion	SS GHSS T. T Ship Haripur	
9	Muhammad Zahoor MA B.Ed.	16/04/1968	Abbottabad	03/07/1999	03/07/1999	17	By Promotion	SS Eng GHSS Lora Abbottabad	
10	Waqar Ahmad Khan M.A B.Ed	01/05/1965	Swabi	10/07/1999	10/07/1999	17	By Promotion	SS GHSS Nizampur NSR	
11	Basit Saleem Shah M.A B.Ed	28/12/1969	Peshawar	10/07/1999	10/07/1999	17	By Promotion	SS GHSS Mathra Peshawar	
12	Muhammad Farooq Khan M.A B.Ed	05/04/1967	Swabi	07/10/1995	25/11/1999	17	By Promotion	SS GHSS Totalai Gunir	
13	Muhammad Amin Syod M.A B.Ed	03/08/1972	Peshawar	25/11/1999	25/11/1999	17	By Promotion	SS GHSS Mathra Peshawar	
14	Muhammad Asif Jan M.A B.Ed	02/05/1972	Charsadda	25/11/1999	25/11/1999	17	By Promotion	SS GHSS Osohra Charsadda	
15	Khan Bad Shah M.A B.Ed	12/02/1967	Swabi	25/11/1999	25/11/1999	17	By Promotion	SS GHSS Hazra Khwani Peshawar	
16	Saif Ul Islam M.A B.Ed	10/10/1968	Karak	05/09/1996	25/11/1999	17	By Promotion	SS GHSS Shekhan Peshawar	
17	Ayaz Akbar Khan M.A B.Ed	28/02/1969	Haripur	17/02/2000	17/02/2000	17	By Promotion	SS GHSS Kot Najeobulla Haripur	
18	Muhammad Nawaz Khan M.A B.Ed	30/09/1964	Peshawar	25/11/1999	25/11/1999	17	By Promotion	SS GHSS Bagnotar A/Abad	
19	Kiramal Ullah M.A B.Ed	10/10/1967	Bannu	25/11/1999	25/11/1999	17	By Promotion	SS GHSS Esak Khot Laki	
20	Muhammad Azmat, M.A B Ed	15/02/1973	Haripur	25/11/1999	25/11/1999	17	By Promotion	SS, GHSS, Haripur	

SR.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st Entry In Edu; Deptt;	Reg. Date	Grade	Method	Designation/Place of Posting	Remarks
2564	Muhammad Asif Iqbal SET MA M.Ed	1/9/1960	Nowshera	12/9/1989	17/3/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Rashakai Nowshera	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2565	Johanzob SET MSc B.Ed	12/4/1966	Karak	23/5/1992	17/3/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Sufaid Sang Peshawar	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2566	Muhammad Nisar MA M.Ed	30/3/1981	Mohmand Agency	28/12/1994	17/3/2016	17	By Promotion	SS B-17 (English) GHSS Hassanzai, Charsadda	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2567	Amoer Khan SET MA M.Ed	7/6/1966	Mohmand Agency	24/7/2003	17/3/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Dargai, Charsadda	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2568	Amdar Ali Khan SET MSc M.Ed	1/12/1968	Bannu	1/4/1992	17/3/2016	17	By Promotion	SS B-17 (Physics) GHSS Hazar Khwani, Peshawar	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2569	Muhammad Fayaz SET MA M.Ed	1/4/1972	Peshawar	7/1/1991	17/3/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Sufaid Sang, Peshawar	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2570	Saleem Ullah Khan MA M.E	18/12/1969	Bannu	8/1/1991	17/3/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Daraka Aziz Khan, Lakki	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2571	Ghulam Fawoq SET MSc M.Ed	10/2/1963	Kohat	13/11/1988	17/3/2016	17	By Promotion	SS B-17 (Physics) GHSS Khair Abad, Dir Lower	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2572	Maqbool Khan SET MSc M.Ed	16/3/1969	Karak	17/11/1994	17/3/2016	17	By Promotion	SS B-17 (Maths) GHSS Amandi Umar Khan Bannu	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2573	Ilan Nawaz SET MSc M.Ed	1/9/1971	Karak	23/10/1995	17/3/2016	17	By Promotion	SS B-17 (Maths) GHSS Dhand Saghri, Kohat	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2574	Saidar Ali SET MSc M.Ed	1/9/1970	Mardan	7/1/1997	17/3/2016	17	By Promotion	SS B-17 (Physics) GHSS Gaddar, Mardan	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2575	Riaz Ali SET MA M.Ed	10/12/1970	Peshawar	17/3/1992	17/3/2016	17	By Promotion	SS B-17 (Economics) GHSS Pir Saddi, Mardan	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2576	Tariq Rehman s/o Abdul rehman SET MA M.Ed	30/10/1967	D.I.Khan	18/1/1988	17/3/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Ketch D.I.Khan	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2577	Muhammad Adil SET MSc M.Ed	10/3/1968	Swabi	6/8/1991	17/3/2016	17	By Promotion	SS B-17 (Maths) GHSS Tarakni Swabi	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2578	Abdul Rauf Shah SET MSc M.Ed	1/3/1971	Bannu	1/9/1991	17/3/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Landiwa Lakki	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2579	Azizul Rehman SET MA M.Ed	1/4/1969	Swat	2/4/1991	17/3/2016	17	By Promotion	SS B-17 (English) GHSS Kabal, Swat	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016

SR.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st Entry in Edu; Deptt;	Reg. Date	Grade	Method	Designation/Place of Posting	Remarks
2610	Jehanzeb SET MSc B.Ed	8/1/1970	Bannu	17/1/1995	17/3/2016	17	By Promotion	Services placed at the disposal of Director Education FATA	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2611	Sabir Hussain SET MSc B.Ed	18/4/1968	Khairam Agency	5/6/1990	17/3/2016	17	By Promotion	Services placed at the disposal of Director Education FATA	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2612	Qwoubulbat SET MSc M.Ed	3/5/1997	Mohmand Agency	9/1/1999	17/3/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Paka Dherai Mardan	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2613	Taj Wali Khan SET MA M.Ed	1/8/1967	Nowshera		17/3/2016	17	By Promotion	SS B-17 (English) GHSS Jehangira Swabi	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2614	Aziz ur Rehman SET MSc M.Ed	16/3/1977	Lakki Marwat		17/3/2016	17	By Promotion	SS B-17 (Statistics) GHSS Nowshera Kalan	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2615	Rahim Oil Khan, SET	10/9/1972	Karak	16/10/2003	17/3/2016	17	By Promotion	SS B-17 (Statistics) GHSS Labozai, Bannu	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2616	Rahman Janan SET MA M.Ed	1/3/1977	Karak	16/10/2003	17/3/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Dattan, Hangu	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2617	Roshan Islam s/o Saood Muhammad, SET MSc M.Ed	15/4/1975	Karak	19/4/1999	17/3/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Ibrahimzal, Hangu	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2618	Dilawar Khan SET MA B Ed	15/3/1974	Karak	16/10/2003	17/3/2016	17	By Promotion	SS B-17 (English) GHSS Kandu Khel Karak	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2619	Ijaz Saud SET MSc M.Ed	5/5/1969	Kohat	16/10/2003	17/3/2016	17	By Promotion	SS B-17 (Economics) GHSS Dattan, Hangu	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2620	Shah Sawaar Khan SET MSc M.ED	5/12/1971	Kohat	16/10/2003	17/3/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Yarik, D.I.Khan	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2621	Muhammad Tariq Javed SET MSc M.Ed	12/4/1975	D.I.Khan	16/2/1998	17/3/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Kachi Paind Khan D.I.Khan	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2622	Tariq Mahmood Khan SET BA B.Ed	11/6/1968	D.I.Khan		17/3/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Paharpur D.I.Khan	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2623	Ishbaq Ahmad SET MSc M.Ed	22/5/1976	Karak	17/9/2003	17/3/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Daraka Aziz Khan Lakki	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2624	Muhammad Nawaz SET MA B Ed	11/1/1970	Khyber Agency	18/9/2003	17/3/2016	17	By Promotion	Services placed at the disposal of Director Education FATA	No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016

SR.No	Name of Officers with Qualification	D/O Birth	Domicile	Grade	Method	Designation/Place of Posting	Remarks	
2671	Nasir Ali SET M.A B.Ed	6/2/1971	Khurram Agency	31/8/2004	17/3/2016	17	By Promotion	Services placed at the disposal of Director Education FATA No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2672	Muhammad Naeem SET M.Sc/M.Ed	24/5/1969	Mansohra	31/8/2004	17/3/2016	17	By Promotion	SS B-17 (Statistics) GHSS Jabori, Mansohra No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2673	Muhammad Saqib SET MA M.Ed	30/5/1964	Mansohra	31/8/2004	17/3/2016	17	By Promotion	SS B-17 (Economics) GHSS Parhina Mansohra No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2674	Muhammad Idrees SET MSc B.Ed	20/5/1962	Mansohra	31/8/2004	17/3/2016	17	By Promotion	SS B-17 (Physics) GHSS Jabori, Mansohra No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2675	Hidayat Ullah SET MSc B.Ed	9/4/1988	Swat	31/8/2004	17/3/2016	17	By Promotion	SS B-17 (Statistics) GHSS Balogram, Swat. No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2676	Muhammad Arif Khan SET MSc/M.Ed	4/2/1963		9/1/2004	17/3/2016	17	By Promotion	SS B-17 (Economics) GHSS Madyan Swat No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2677	Muhammad Rehman SET M.Sc/B.Ed	1/8/1955		9/1/2004	17/3/2016	17	By Promotion	SS B-17 (Maths) GHSS Abakhal Lakki No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2678	Nasir ud Din SET BA B.Ed	9/12/1965		9/1/2004	17/3/2016	17	By Promotion	SS B-17 (Physics) GHSS Mansabdar, Swabi No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2679	Muhammad Akram s/o Alimad Jan SET MAM.Ed	14/1/1968		8/9/2004	17/3/2016	17	By Promotion	SS B-17 (English) GHSS Kot Kashmir, Lakki No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2680	Anwar Ali SET M.Sc/M.Ed	1/11/1966		16/9/2004	17/3/2016	17	By Promotion	SS B-17 (Physics) GHSS Landi Kachi, Kohat No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2681	Ishaq Hussain	2/9/1967	Haripur	17/5/1992	17/3/2016	17	By Promotion	SS B-17 (English) GHSS Dangi, Haripur No.SO(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016

\*\*\* Prepared by Salfullah Khalil \*\*\*

36	776
23	337

21.5555556  
14.65217391



To

The Director,  
Elementary & Secondary Education, Khyber Pakhtunkhwa.  
Peshawar.

Approved /c

27

DA (S) \*  
present  
on file

*[Signature]*  
22/1/17

Subject: APPLICATION FOR CORRECTION OF SENIORITY NUMBER

R/Sir,

It is humbly stated for your kind consideration that the date of my first entry in the Education Department is 12-01-1988, which is not included in the tentative list of SS/HM issued on 31-12-2016., Due to which my name at S.No.2613 is not in proper sequence.

It is therefore requested that my seniority number may please be accorded to the criteria for seniority before the compilation of the ultimate list and oblige.

Yours obediently,

*[Signature]*

Faj Wali Khan S.S. (English)

GHSS Jabbi (Nowshera)

Dated: 23-01-2017

SS/HT(S)  
21/2/17

Photocopy Attached:

- 1) First Appointment Order
- 2) sst appointment order
- 3) Curricular vitae.

Copy No. 936 of 23-1-2017  
OIC THE DEO (M) NSR

*[Signature]*

Dated 23-01-2017

No. 91

Forwarded to the DEO (M) NSR for onward submission pl.

*[Signature]*  
PRINCIPAL  
GHSS  
Jabbi Nowshera



OFFICE OF THE  
DISTRICT EDUCATION OFFICER (MALE)  
NOWSHERA.

(Office Phone#0923-9220228, Fax#0923-9220228)

No. 4489 DEO (M) NSR/Estab: Branch/dated NSR th 30/11/2017

To,

The Director  
E & SE Khyber Pakhtunkhwa Peshawar.

Subject:  
Memo,

APPLICATION FOR CORRECTION OF SENIORITY NUMBER.

Enclosed please find herewith an original application for  
Correction of seniority list in respect of Mr, Taj Wali Subject Specialist  
(English) GHSS, Jabbi\_Nowsheera for further necessary action.

*[Signature]*  
District Education Officer (Male)  
Nowshera

676  
1/2/2017

20  
*Amir M*

14

**REVISED & UPDATED FINAL SENIORITY LIST OF SUBJECT SPECIALISTS/HEAD MASTERS MALE (B-17) OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA PESHAWAR STOOD ON 23-10-2017**

SR.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st Entry in Edu; Deptt;	Regular appointment/promotion to the present post			Designation/Place of Posting	Remarks
					Reg. Date	Grade	Method of Recruitment		
1	Muhammad Farooq Khan M.A B.Ed	05/04/1967	Swabi	07/10/1995	25/11/1999	17	By Promotion	SS GHSS Totafai Bunir	
2	Inayat Ur Rehman M.A.B.Ed	12/04/1969	Abbottabad	24/07/1993	25/5/2000	17	By Promotion	SS GHSS Bol Abbottabad	
3	Zair Gul VAM.Sc. B.Ed. SS Economics	13/12/1957	Bannu	09/11/1984	31/08/2000	17	By Promotion	SS GHSS Karak	sen. aw. vd so(sj) 1-5/2007 dt 30-10-2008 SET S.No. 3670/2001
4	Asmatullah, M.Sc B.Ed	01/02/1975	Peshawar	01.10.2003	23/07/2005	17	By Promotion	SS, Maths, GHSS, Mayar Dir lower	
5	Abdul Shakoor, M.A B.Ed	17/04/1976	Mansehra	05.11.2003	23/07/2005	17	By Promotion	SS, Eng, GHSS, Dhodhal Mansehra	
5-A	Muhammad Shakoor S/O Sherzaman SS PS	04.01.1974	Malakand	10.04.2006	10.04.2006	17	D/Selectee	SS PS GHSS Palai Malakand	Reinstated vide No. SO(SM) E&SED /4-17/2012.M Shakoor SS Dated 24.08.2014
6	Noorani Shah s/o Amin Khan M.A B.Ed	05/01/1962	Lakki Marwat	19-09-1990	24.09.2007	17	D/Selectee	HM GHS Tough Sarai Hangu	SO(S)3-2/2006(HM/M) dt 24.09.2007(Merit 07/2004)
7	Mr. Gul Rukhan M.A B.Ed	09/10/1958	NWA	15/02/1981	06/03/2006	17	By Promotion	HM C/O FATA	
8	Mr. Saïd Wali, M.A B.Ed	10/10/1958	Mardan	21/04/1981	06/03/2006	17	By Promotion	HM, GHS, Balakara Swabi	
9	Mr. Muhammad Javed, M.A B.Ed	16/04/1959	D.I. Khan	10/01/1991	06/03/2006	17	By Promotion	HM, GHS, Rori D.I. Khan	
10	Mr. Sultan Muhammad, M.A B.Ed	02/10/1958	Charsadda	07/09/1969	06/03/2006	17	By Promotion	HM, GHS, Turangzai Charsadda	
11	Mr. Ahmad Ghazi, M.A B.Ed	15/01/1959	Chitral	25/11/1981	06/03/2006	17	By Promotion	HM, GHS, Asherate, Chitral	
12	Mr. Zahid Ahmad, M.A B.Ed	04/04/1958	Charsadda	03/01/1982	06/03/2006	17	By Promotion	HM, GHS, Behlola Charsadda	
13	Mr. Sher Daraz Khan, M.A M.Ed	12/10/1959	Bannu	01/01/1982	03/06/2006	17	By Promotion	HM GHS Bilawar Khan, Bannu	
14	Mr. Dilbar Khan, M.A B.Ed	14/12/1962	Dir	07/09/1970	21/04/2007	17	By Promotion	HM, GHS, Mirakai Dir (L).	
15	Mr. Afsar Khan, M.A B.Ed	19/08/1958	NWA	03/01/1982	21/04/2007	17	By Promotion	HM, GHS, C/O FATA.	
16	Mr. Abdur Rashid, M.A M.Ed	12/04/1961	Lakki Marwat	09/03/1982	21/04/2007	17	By Promotion	HM, GHS, Tabi Murad Lakki.	
17	Mr. Ghulam Murtaza, M.A B.Ed	15/10/1959	Mansehra	13/09/1982	21/04/2007	17	By Promotion	HM, GHS, Takra Mansehra.	
18	Mr. Mohammad Said, M.A B.Ed	04/01/1958	Bajour Agency	19/09/1978	21/04/2007	17	By Promotion	HM, GHS, C/O FATA.	
19	Mr. Jehanzeb Shah, M.A B.Ed	05/11/1958	Swabi	10/01/1980	21/04/2007	17	By Promotion	HM, GHS, Jagan Nath Swabi.	
20	Mr. Kamazar Khan, M.A B.Ed	10/01/1960	Chitral	11/11/1982	21/04/2007	17	By Promotion	HM, GHS, Sweer Chitral.	
21	Iqbal ur Rahman S/O Sher Zarin SS Pak. Studies	15/04/1966	Karak	15/11/1994	01/01/2008	17	By Promotion	SS GHSS Dabli Lawaghar Karak	SO(PE) E&SED/7-9/2010/Prom. to SS dated 5.12.2012(Court Decision)
22	Muhammad Issa Khan s/o Mosa Khan SS (Economics)	10/04/1975	Swat	26/02/2008	26/02/2008	17	D/Selectee	SS GHSS Kabal Swat	no correction his position his s/o 147 is correct
23	Hafiz Muhammad Rasool s/o Mured Rasool SS (Islamiat)	27/03/1968	Chitral	17/07/2008	17/07/2008	17	D/Selectee	SS GHSS Jalozai Noshehra	SO(S)3-2/2006/SS(M) dt 17-07-2008 (Merit 02/2007)
24	Riaz Khan s/o Mira Jan SS (Economics)	01/02/1982	Mohmand Agency	26/02/2008	26/02/2008	17	D/Selectee	SS GHSS Manga Dargai Charsadda	SO(S)3-2/2006/SS(M) dt 26.02.2008 (Merit 02/2007)
25	Zahid Rafoq s/o Muhammad Rafoq SS (Economics)	03/02/1980	Charsadda	26/02/2006	26/02/2008	17	D/Selectee	SS GHSS Nissata Charsadda	
26	Firdos Khan s/o Sherin Muhammad SS (Stat)	03/01/1980	Dir	26/02/2008	26/02/2008	17	D/Selectee	SS GHSS Haya Dheri Dir (L)	
27	Hafiz Saïd ur Rehman s/o Molvi Noor ul Haq SS (Islamiat)	19/01/1965	Mardan	17/07/2008	17/07/2008	17	D/Selectee	SS GHSS No.1 Mardan	SO(S)3-2/2006/SS(M) dt 17.07.2008 (Merit 02/2007)
28	Hazir Ammar s/o Wali Muhammad SS (Economics)	15/11/1970	Peshawar	26/02/2008	26/02/2008	17	D/Selectee	SS GHSS Nahagi Peshawar	SO(S)3-2/2006/SS(M) dt 26.02.2008 (Merit 02/2007)
29	Shabeer Shah s/o Zahir Shah SS (Economics)	15/12/1977	Nowshera	26/02/2008	26/02/2008	17	D/Selectee	SS GHSS Kheshti Payan Nowshera	SO(S)3-2/2006/SS(M) dt 26.02.2008 (Merit 02/2007)
30	Ghanyoor Anwar s/o Fazle Rahim SS (Economics)	27/05/1972	Charsadda	26/02/2008	26/02/2008	17	D/Selectee	SS GHSS Hassan Zai Charsadda	SO(S)3-2/2006/SS(M) dt 26.02.2008 (Merit 02/2007)

SR.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st Entry in Edu; Dept;	Regular appointment/promotion to the present post			Designation/Place of Posting	Remarks
					Reg. Date	Grade	Method of Recruitment		
2349	Mehraban Khan M.A B.Ed M.Sc. M.Ed.	20/05/1955	Haripur	14/10/1987	17/03/2016	17	By Promotion	SS B-17 (Pak Study) GHSS Birote, Abbotabad	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2350	Muhammad Ayub Khan M.A B.Ed MA (Edu)	22/11/1956	Lakki Marwat	25/11/1985	17/03/2016	17	By Promotion	SS B-17 (Economics) GHSS Kheru Khel Pakka Lakki	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2351	Shabir Ahmad M.A B.Ed BA Bed	16/04/1950	Lakki Marwat	21/10/1964	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Mandra Kalan, D.I.Khan	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2352	Faiz ur Rehman M.A B.Ed MA M.Ed	16/09/1952	D.I.Khan	19/11/1987	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Paharpur, D.I.Khan	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2353	Rehmat Ullah M.A B.Ed MA B.Ed	23/08/1955	Lakki Marwat	22/10/1983	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Kachi Painda Khel, D.I.Khan	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2354	Safeer Ullah Khan M.A B.Ed MA B.Ed	07/10/1963	Bannu	24/11/1985	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Ibrahimzai, Hangu	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2355	Muhammad Subhan M.A B.Ed MA M.Ed	20/06/1964	Mansehra	18/04/1985	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Battal, Mansehra	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2356	Muhammad Iqbal M.A B.Ed MSc M.Ed	25/01/1961	Swat	01/09/2003	17/03/2016	17	By Promotion	SS B-17 (Pak Study) GHSS Bamakhela, Swat	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2357	Muhammad Younis M.A B.Ed MA (Edu)	16/11/1965	Mansehra	02/10/1985	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Trippi, Mansehra	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2358	Muhammad Saeed Akhtar M.A B.Ed MA (Edu)	15/03/1965	Mansehra	29/09/1986	17/03/2016	17	By Promotion	SS B-17 (Economics) GHSS Kahal Haripur	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2359	Khalid Mehmood M.A B.Ed MA M.Ed	01/12/1958	Haripur	09/10/1984	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Parhina, Mansehra	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2360	Muhammad Saeed M.A B.Ed MA (Edu)	11/12/1963	Mansehra	17/01/1986	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Parhina, Mansehra	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2361	Ashraf Khan M.A B.Ed MSc M.Ed	05/06/1964	Swabi	28/02/1980	17/03/2016	17	By Promotion	SS B-17 (Maths) GHSS Maneri Swabi	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2362	Muhammad Asif Iqbal M.A B.Ed	01/09/1966	Nowshera	12/09/1989	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Rashakai Nowshera	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2363	Jehanzeb M.A B.Ed MSc B.Ed	12/04/1966	Karak	23/05/1992	17/03/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Sheikhani, Peshawar	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2364	Muhammad Nisar MA M.Ed	30/03/1961	Mohmand Agency	26/12/1984	17/03/2016	17	By Promotion	SS B-17 (English) GHSS Hassanzai, Charsadda	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2365	Amir Khan M.A M.Ed	07/06/1966	Mohmand Agency	24/07/2003	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Dargai, Charsadda	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2366	Amdar Ali Khan M.A B.Ed MSc M.Ed	01/12/1968	Bannu	01/04/1992	17/03/2016	17	By Promotion	SS B-17 (Physics) GHSS Hazar Khwani, Peshawar	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2367	Muhammad Fayaz M.A B.Ed MA M.Ed	01/04/1972	Peshawar	07/01/1991	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Sufaid Sang, Peshawar	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2368	Saleem Ullah Khan MA M.E	18/12/1969	Bannu	08/01/1991	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Daraka Aziz Khan, Lakki	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2369	Ghulam Farooq M.A B.Ed MSc M.Ed	10/02/1963	Kohat	13/11/1986	17/03/2016	17	By Promotion	SS B-17 (Physics) GHSS Muslim Abad, Kohat	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2370	Maqbool Khan M.A B.Ed MSc M.Ed	16/03/1959	Karak	17/11/1994	17/03/2016	17	By Promotion	SS B-17 (Maths) GHSS Amandi Umar Khan Bannu	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2371	Ilam Nawaz M.A B.Ed MSc M.Ed	01/09/1971	Karak	23/10/1985	17/03/2016	17	By Promotion	SS B-17 (Maths) GHSS Dhand Saghini, Kohat	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2372	Sa'dar Ali M.A B.Ed MSc M.Ed	01/09/1970	Mardan	07/01/1997	17/03/2016	17	By Promotion	SS B-17 (Physics) GHSS Gaddar, Mardan	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2373	Riaz Ali M.A B.Ed MA M.Ed	10/12/1970	Peshawar	17/03/1992	17/03/2016	17	By Promotion	SS B-17 (Economics) GHSS Ghaladher, Mardan	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2374	Sarfaraz Rehman s/o Abdur Rehman M.A B.Ed MA M.Ed	30/10/1967	D.I.Khan	16/01/1988	17/03/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Ketch D.I.Khan	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2375	Muhammad Asif M.A B.Ed MSc M.Ed	10/03/1958	Swabi	05/05/1996	17/03/2016	17	By Promotion	SS B-17 (Vans) GHSS Naru Banda, Swabi	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2376	Abdul Rauf Saifi M.A B.Ed MSc M.Ed	01/03/1971	Bannu	01/09/1994	17/03/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Langwala Lakki	No.SQ(PE)2-6DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016

Sr. No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry in Edu; Deptt;	Regular appointment/promotion to the present post			Designation/Place of Posting	Remarks
					Reg. Date	Grade	Method of Recruitment		
2406	Jehanzeb MSc B.Ed SS (Che)	08/01/1970	Bannu	17/11/1995	17/03/2016	17	By Promotion	Services placed at the disposal of Director Education FATA	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2407	Sabir Hussain MSc B.Ed. SS (Che)	18/04/1968	Khurram Agency	09/06/1990	17/03/2016	17	By Promotion	Services placed at the disposal of Director Education FATA	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2408	Qareebullah MA B.Ed MSc M.Ed	03/05/1967	Mohmand Agency	09/01/1999	17/03/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Palo Dheri Mardan	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2409	Taj Waq Khan MA B.Ed MA M.Ed	01/08/1967	Nowshera	12/01/1988	17/03/2016	17	By Promotion	SS B-17 (English) GHSS Jehangira Swabi	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2410	Aziz ur Rehman MA B.Ed MSc M.Ed	16/03/1977	Lakki Marwat		17/03/2016	17	By Promotion	SS B-17 (Statistics) GHSS Nowshera Kalan	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2411	Raham D8 Khan, MA B.Ed	10/09/1972	Karak	16/10/2003	17/03/2016	17	By Promotion	SS B-17 (Statistics) GHSS Nowshera Kalan	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2412	Rehman Janan MA B.Ed MA M.Ed	01/03/1977	Karak	15/10/2003	17/03/2016	17	By Promotion	SS B-17 (Statistics) GHSS Lalozai, Bannu	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2413	Roshan Islam s/o M.Fammad Saeed MA B.Ed	15/04/1975	Karak	19/04/1999	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Dallah, Hangu	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2414	Dilawar Khan MA B.Ed MA B.Ed	15/03/1974	Karak	16/10/2003	17/03/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Ibrahimzai, Hangu	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2415	Iqbal Saud MA B.Ed MSc M.Ed	05/05/1969	Kohat	16/10/2003	17/03/2016	17	By Promotion	SS B-17 (English) GHSS Muslim Abad, Kohat	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2416	Shah Sawaar Khan MA B.Ed MSc M.Ed	05/12/1971	Kohat	16/10/2003	17/03/2016	17	By Promotion	SS B-17 (Economics) GHSS Dallah, Hangu	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2417	Muhammao Tariq Javeer MA B.Ed MSc M.Ed	12/04/1975	D.I.Khan	16/02/1998	17/03/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Malikhel Janikhel Bannu	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2418	Tariq Mahmood Khan MA B.Ed BA B.Ed	11/06/1968	D.I.Khan		17/03/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Kachi Paind Khan D.I.Khan	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2419	Ishtiaq Ahmad MA B.Ed MSc M.Ed	22/05/1976	Karak	17/05/2003	17/03/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Dhalla, D.I.Khan	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2420	Muhammad Nawaz MA B.Ed SS (Eng)	01/01/1970	Khyber Agency	18/09/2003	17/03/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Bahadar Khel Karak	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2421	Kaleem Ullah MA B.Ed MA M.Ed	12/10/1975	FR Bannu	18/09/2003	17/03/2016	17	By Promotion	Services placed at the disposal of Director Education FATA	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2422	Barkat Shah MA B.Ed MA M.Ed	01/03/1969	FR Bannu	15/10/2003	17/03/2016	17	By Promotion	SS B-17 (English) GHSS Abd-ul-Yazid, Lakki	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2423	Javed Khan MSc M.Ed SS (Phy)	04/03/1974	Khyber Agency		17/03/2016	17	By Promotion	Services placed at the disposal of Director Education FATA	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2424	Sadiqur Rehman MA B.Ed MSc B.Ed	11/03/1969	Malakand	02/10/2003	17/03/2016	17	By Promotion	Services placed at the disposal of Director Education FATA	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2425	Muhammad Salahud Din MSc M.Ed	30/03/1969	FR Bannu	04/10/2003	17/03/2016	17	By Promotion	SS B-17 (Maths) GHSS Mian Brangola, Dr Lower	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2426	Mujeeb ur Rehman MSc B.Ed SS (Che)	10/01/1974	FR Bannu	04/10/2003	17/03/2016	17	By Promotion	SS B-17 (Physics) GHSS Pinda Khel, Bannu	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2427	Shah Bahadar MSc M.Ed SS (Che)	08/10/1970	Bajour Agency		17/03/2016	17	By Promotion	Services placed at the disposal of Director Education FATA	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2428	Muhammad Alam MA B.Ed MA B.Ed	30/09/1969			17/03/2016	17	By Promotion	Services placed at the disposal of Director Education FATA	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2429	Syed Asif Hussain Shah MA B.Ed MA B.Ed	05/03/1970	Mansehra	07/10/2003	17/03/2016	17	By Promotion	SS B-17 (Statistics) GHSS Topai, Buner	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2430	Abdul Majid MA B.Ed MA M.Ed	03/05/1971	Mansehra		17/03/2016	17	By Promotion	SS B-17 (Biology) GHSS Doga, Mansehra	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2431	Abdul Rehman MA B.Ed VSc M.Ed	07/04/1976	Swat		17/03/2016	17	By Promotion	SS B-17 (English) GHSS Paitan, Mansehra	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2432	Muhammaad Fareem MA B.Ed MA M.Ed	01/08/1978	Swabi	30/10/2003	17/03/2016	17	By Promotion	SS B-17 (English) GHSS Kishawra, Swat	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2433	Naseer Ahmad MA B.Ed VSc M.Ed	02/04/1976	Mardan	30/10/2003	17/03/2016	17	By Promotion	SS B-17 (English) GHSS Shaikhani Peshawar	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2434	Vushtaq Ahmad VSc M.Ed Ph.D.	01/01/1972	Charsadda	19/02/1998	17/03/2016	17	By Promotion	SS B-17 (Maths) GHSS Luqman Banda Dr Lower	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2435	Shahabud Din MA B.Ed MSc B.Ed	01/12/1975	Abbottabad		17/03/2016	17	By Promotion	SS B-17 (Economics) GHSS Charsadda No.1	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016
								SS B-17 (Physics) GHSS Kohata, Haripur	No.SQ(PE)2-6/DPC Meeting/SST-SS(20-10-2015) dated 17-03-2016

Sl. No	Name of Officers with Qualifications	D/O Birth	Domicile	Date of 1st; Entry in Edu; Deptt;	Regular appointment/promotion to the present post			Designation/Place of Posting	Remarks
					Reg. Date	Grade	Method of Recruitment		
3381	Muhammad Ilyas M.Sc B.Ed	06/04/1974	Malakand	25/11/2008	30/05/2017	17	Do	SS (Statistics) BS-17 GHSS Sakhat, Malakand	-do-
3382	Sanaullah M.A M.Ed	14/08/1976	Swabi	19/02/2007	30/05/2017	17	Do	SS (Economics) BS-17 GHSS Panjpir, Swabi	-do-
3383	Shah Jehan M.Sc M.Ed	05/02/1978	Swabi	25/11/2008	30/05/2017	17	Do	SS (Biology) BS-17 GHSS Jehangira Swabi	-do-
3384	Saif Ullah M.A M.Ed SS (Eco)	20/11/1978	SWA	25/11/2008	30/05/2017	17	Do	Services placed at the disposal of ACS FATA.	-do-
3385	Surat Khan M.Sc B.Ed SS (Bio)	11/03/1979	FR Bannu	25/11/2008	30/05/2017	17	Do	Services placed at the disposal of ACS FATA.	-do-
3386	Sajjad Haider M.Sc B.Ed SS (Bio)	13/03/1981	SWA	25/11/2008	30/05/2017	17	Do	Services placed at the disposal of ACS FATA.	-do-
3387	Azmat Af M.A M.Ed	15/06/1976	Abbotabad	25/11/2008	30/05/2017	17	Do	Services placed at the disposal of ACS FATA.	-do-
3388	Muhammad Rehman M.A M.Ed SS (Eco)	15/01/1977	NWA	25/11/2008	30/05/2017	17	Do	SS (Economics) BS-17 GHSS Pnuka, Mansehra	-do-
3389	Muhammad Ashraf Khan M.A M.Ed SS (Eco)	01/09/1978	NWA	01/01/2009	30/05/2017	17	Do	Services placed at the disposal of ACS FATA.	-do-
3390	Nasrullah M.A M.Ed	11/03/1980	Swabi	25/11/2008	30/05/2017	17	Do	Services placed at the disposal of ACS FATA.	-do-
3391	Abdul Me'ed M.A B.Ed	01/04/1981	D.I.Khan	02/10/2007	30/05/2017	17	Do	SS (Economics) BS-17 GHSS Dorian, Swabi	-do-
3392	Inam Ullah Khan M.Sc M.Ed SS (Stat)	02/12/1983	FR Lakki	17/12/2008	30/05/2017	17	Do	SS (Economics) BS-17 GHSS Chaudwan, D.I.Khan	-do-
3393	Abdur Raheem M.A M.Ed	07/02/1984	D.I.Khan	25/11/2008	30/05/2017	17	Do	Services placed at the disposal of ACS FATA.	-do-
3394	Asif Nawaz M.Sc B.Ed	03/12/1977	D.I.Khan	02/07/2007	30/05/2017	17	Do	SS (Economics) BS-17 GHSS Abdul Khel, D.I.Khan	-do-
3395	Fakhar Abbas M.Sc B.Ed	20/12/1978	D.I.Khan	17/05/2008	30/05/2017	17	Do	SS (Statistics) BS-17 GHSS Hathala D.I.Khan	-do-
3396	Iqbal Hussain M.A M.Ed	10/11/1980	Dir Upper	02/10/2007	30/05/2017	17	Do	SS (Statistics) BS-17 GHSS Kotjai, D.I.Khan	-do-
3397	Hashmat Ali M.Sc M.Ed	10/03/1985	D.I.Khan	02/10/2007	30/05/2017	17	Do	SS (Economics) BS-17 GHSS Akhagran, Dir Upper	-do-
								SS (Physics) BS-17 GHSS Kacha Mali Kret, D.I.Khan	-do-

**CERTIFICATE**

It is certified that the above seniority list is

- 1 Widely circulated.
- 2 Undisputed/Uncontrovertial.
- 3 No legislation is pending/involved.

Deputy Director (Establishment)  
Directorate of E&SE Khyber Pakhtunkhwa  
Peshawar

33

Approved N

To,

The Director  
Elementary and Secondary education  
Khyber Pakhtunkhwa  
Peshawar.

1425  
29/1/18

Handwritten signature/initials

Subject: DEPARTMENTAL APPEAL AGAINST THE FINAL SENIORITY LIST OF SUBJECT SEPECIALIST BPS-17 AS IT STOOD ON 23.10.2017 CIRCULATED IN THE MONTH OF JANUARY 2018.

Prayer in Appeal:

ON ACCEPTANCE OF THIS APPEAL, THE FINAL SENIORITY LIST SO CIRCULATED MAY PLEASE BE SET ASIDE, THE UNDERSIGNED MAY PLEASE BE ALLOWED HIS CORRECT PLACE AT THE SENIORITY LIST,

Dear Sir,

1. That the undersigned was initially appointed as PTC teacher (now renamed as PST) vide order dated 09.01.1988. during the course of employment I got promoted as C.T vide order dated 24.10.1993.
2. That ever since my appointment, I had performed my duties as assigned with zeal and devotion and have never given any chance of complaint whatsoever regarding my performance.
3. That in the year 2003 I applied for the post of S.E.T on batch wise method/appointment. However my name was not included in the appointment notification dated 14.07.2003. Feeling aggrieved I filed appeal for my appointment vide my application dated 28.07.2003. accordingly a corrigendum notification was issued on 29.09.2009 vide which I was also issued in the appointment notification it was specifically mentioned that inter se seniority will be determent in accordance with the merit fixed by the departmental selection committee. It is pertinent to mention here I got 59.25 marks in the said criteria for appointment.
4. That on my appeal I was consequently appointed vide appointment notification dated 29.09.2003. It was also mentioned in the notification that my seniority will be reckoned from the date of original notification i.e, 01.09.2003.

5. That in the year 2010, tentative seniority list of SET's was issued however my name was missing in the said list. I filed application on 28-07-2010 for inclusion of my name in the said list. I filed application vide application dated 28.07.2010.
6. That in the year 2015 on the recommendation of Departmental Promotion Committee I, amongst other SET's, was upgraded from BPS-16 to BPS-17 vide notification dated 28.03.2014. Although I also got the up gradation but found my name at seniority list no. 4136 much below the name of my colleague namely Muhammad Asif Iqbal was placed at serial no. 3788. Again I filed the applications on 14.04.2014 and 05.07.2014 for allocation of my due placement in the seniority list, which was forwarded to Director Elementary and Secondary Education Peshawar vide letter dated 27.08.2014, however no action was taken.
7. That in the mean time I was promoted to the post of Subject Specialist BPS-17 vide notification dated 17.03.2016, But the same error existed in the seniority list as I found my name at improper place at Serial No. 4056. I filed application dated 01.09.2016.
8. That the tentative list of subject Specialist BPS-17 as it stood on 31.12.2016 was issued in January 2017, wherein my first appointment date was missing due to which my due seniority number could not allotted to me in the said list. I filed application dated 23.01.2017 which was forwarded to the Director E & S Education Peshawar vide letter dated 30.01.2017, however no action was taken.
9. That now the final seniority list of Subject Specialist as it stood on 23.10.2017 has been circulated in January 2018. In the said list I was placed at serial No. 2409 much junior to my colleague namely Asif Iqbal who is placed at 2362.
10. That feeling aggrieved from the list, the instant departmental appeal is filed inter alia on the following grounds.

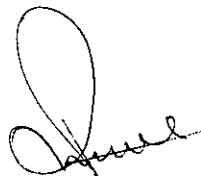
**GROUND:**

- A. that my rights secured and guaranteed under the law are badly violated.
- B. That I have not been treated in accordance with law.
- C. that I throughout agitated the issue of my seniority I files so many application from time to time in this regard however no action was taken on my application.
- D. That my name was not included in the notification dated 01-09-2003 and upon my application subsequently I was appointed vide dated 29-



- 09-2003. It was specifically mentioned in the initial notification dated 01-09-2003 that inter se seniority would be in accordance with the merit fixed by the departmental selection committee. My name was excluded from the notification dated 01-09-2003 which was subsequently corrected on my application and I was given appointment notification wherein it was mentioned that my seniority would be determined with effect from 01-09-2003.
- E. That my name was not included in the original notification dated 01-09-2003. Which was not my fault. I got 59 marks and had every right to be included the notification dated 01-09-2003, however on my application I was subsequently appointed so I cannot be suffered for the acts and omissions of the department.
- F. That the said teacher was much junior to me in the since that my first appointment in the department is 12.01.1988 whereas the said teacher first appointment was on 09.12.1989. furthermore my marks for the post of SET 59.25 while the said teacher Muhammad Asif iqbal got 56 marks round about.
11. That I cannot be deprived of my rights of seniority and it would be counted from date of regular appointment. I could thus, not be legally deprived of my rights.
12. That I was placed at improper place in the impugned final seniority list which is in conflict and against the rules on the subject due to the acts and omission of the department even my juniors have become seniors of me.

**ON ACCEPTANCE OF THE APPEAL, THE FINAL SENIORITY LIST SO CIRCULATED MAY PLEASE BE SET ASIDE. THE UNDERSIGNED MAY PLEASE BE ALLOWED HIS CORRECT PLACE AT THE SENIORITY LIST.**



Taj Wali Khan SS (English)  
G.H.S.S Khairabad NOWshera  
Cell#0333-9006804  
Dated: 27-01-2018

# بعد الت

2018ء، پنجاب

تجاری عدالت بنام

موزعہ  
مقدمہ  
دعویٰ  
جرم

## باعث تحریر آئندہ

مقدمہ مندرجہ عدالت عالیہ میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ  
آن مقام کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کابل اختیار ہوگا۔ نیز  
دکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یا کسٹرف یا اپیل کی براندگی اور منسوخی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ  
پرداختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ سندر ہے۔

المرقوم 2018ء گ ماہ گ

کے لئے منظور ہے۔

Amal Khan

Accepted

بمقام

(S)

So

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

Service Appeal No: 914/2018

Taj Wali Khan SS GHSS Khair Abad District Nowshera.

.....Appellant.

**VERSUS**

Secretary E&SE Department, Khyber Pakhtunkhwa & others.

...Respondents

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2	Copy of the Circular dated 08/4/2014	A	5
3	Copy of the seniority list of SST as stood on 01/4/2014	B	6-8
4	Copy of the seniority list of SST as stood on 23/10/2017	C	9-12

*(Signature)*  
**Asstt: Director (Lit: II)**  
E&SE Department, Khyber  
Pakhtunkhwa, Peshawar.

30/05/2018

- 12.01.1988 appointed  
- 24.10.93  
- 24.07.03 - SST

(4) (2) (1)

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

Service Appeal No: 914/2018

Taj Wali Khan SS GHSS Khair Abad District Nowshera.

.....Appellant.

**VERSUS**

Secretary E&SE Department, Khyber Pakhtunkhwa and others.

.....Respondents

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

Respectfully Sheweth :-

The Respondents submit as under:-

**PRELIMINARY OBJECTIONS.**

- 1 That the Appellant has got no cause of action/locus standi.
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal in the instant service appeal.
- 4 That the instant service appeal is against the relevant provisions of law.
- 5 That the appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the instant appeal is liable to be dismissed for mis-joinder & non-joinder of the necessary parties to the present appeal.
- 7 That the appellant is estopped by his own conduct to file the instant appeal.
- 8 That the instant Service Appeal is not maintainable in the present form & circumstances of the case.
- 9 That the instant Appeal is barred by law.
- 10 That the impugned seniority list as stood on 23/10/2017 is legally competent.
- 11 That the appellant has been at his original seniority number by the Respondent Department.

**ON FACTS.**

- 1 That Para-I, needs no comments being relates to the service record of the appellant regarding appointment against the PTC now PST Post vide appointment order dated 12/01/1988 by the Respondent Department & on the basis of his first date of appointment, the appellant has been promoted against the CT Post vide order dated 24/10/1993 by the Respondent Department as per seniority list as stood on 01/4/2014 falling at seniority No: 4056 with his date of passing his B Ed examination in 1993 having domiciled in District Nowshera.

(S) (S)

Hence, the claim of the appellant regarding his first date of appointment is 09/01/1988 is incorrect & denied in view of the seniority list as stood on 01/4/2014 as notified vide circular letter No: 2123-26 dated 08/4/2014 issued by the Respondent No: 2 under the mandatory provision of Section-8 of Civil Servants Act 1973. **(Copies of the said circular & seniority list are attached as annexures A&B).**

- 2 That Para-2 needs no comments as each & every Civil Servant falling under the ambit of Section-2(b) of the above said Act: is liable to serve the department with his utmost sincerity & devotion against the post he holds in the Respondent Department.
- 3 That Para-3 is correct to the extent of promotion of the appellant vide Notification dated 24/7/2003 as against the factual position that as per seniority list pertaining to the SETs/SSTs (BPS-16) as stood on 01/4/2014, the date of promotion of the appellant has been shown as 01/9/2003 instead of 24/7/2003 as evident from the above mentioned seniority list pertaining to the SETs/SSTs in the Respondent Department in accordance with the inter se seniority maintained by the Respondent Department. Therefore, the stand of the appellant is baseless & without nay cogent proof & justification in view of the foregoing submissions in the instant reply.
- 4 That Para-4 is incorrect & denied on the grounds that as per available record of the appellant he has been placed on his correct seniority position pertaining to the SS in English in BPS-17 & on the basis of the said seniority as stood on 23/10/2017 falling at seniority number 2409. Hence, the plea of the appellant is without any cogent proof & justification **(Copy of the said seniority list is annexure-C).**
- 5 That Para-5 is incorrect & denied. No application what so ever has been filed by the appellant to the competent authority for the inclusion of his name & other particulars for the inclusion of the same in the tentative seniority list in the year 2010, therefore, the stand of the appellant is liable to be dismissed.
- 6 That Para-6 is correct to the extent of ungradation of the appellant from BPS-16 to 17 (Personal) in view of the notification dated 28/3/2014 on the basis of his seniority cum fitness against the SST(G) Post in BPS-17 whereas, rest of the para is incorrect & denied on the grounds that as per final seniority list stood as 01/4/2014, the appellant has been shown & placed at Serial No: 4056 in accordance with the relevant provisions of law. Therefore, the stand of the appellant is liable to be rejected in view of the above mentioned factual position in the instant reply.
- 7 That Para-7, is also incorrect & misleading on the grounds that the appellant has been promoted against the SS(English) in BPS-17 post vide Notification dated 17/3/2016 on the basis of his seniority cum-fitness as well as in view of the final seniority list as stood on 23/10/2017 wherein, the appellant has been shown at seniority number 2409 (Page-76) under the mandatory provisions of Section-8 of Civil Servants Act: 1973 & where against no Departmental appeal has been filed by the appellant. Hence, the appeal is liable to be rejected on the question of law of limitation.

- (1) (3)
- 8 That Para-8 is incorrect & denied on the grounds that the Respondent Department has acted as per law, rules & policy in the instant case having no question of mistake & error on the part of the E&SE Department with the submission that tentative seniority list can't be challenged at any forum. Therefore, the plea of the appellant is itself an illegality on his part.
  - 9 That Para-9 is also incorrect & denied on the grounds that the final seniority list as stood on 23/10/2017 is within legal parameter & liable to be maintained in favour of the Respondents.
  - 10 That Para-10 is incorrect & denied on the grounds that no departmental appeal has been filed by the appellant no any such record is available in the offices of the Respondents till date. Hence, the appeal in hand is liable to be dismissed on the following grounds inter alia:-

## GROUNDS

- 1 Incorrect & denied. The appellant has been treated as per law, rules & Policy in the instant case by the Respondent Department & has not violated the constitutional rights of the appellant. Hence, the stand of the appellant is baseless & liable to be struck down.
- 2 Incorrect & not admitted. Detailed reply to this ground has already been given in ground-I. Hence, needs no further comments.
- 3 Incorrect & denied. No application what so ever has been filed by the appellant till date as the act of the Respondent Department is within legal sphere.
- 4 Incorrect & denied. Detailed reply to this has too been given in the facts as well as grounds of the present reply. Hence, needs no further comments.
- 5 Incorrect & denied. The act of the Respondents with regard to the above cited notifications & seniority list is within legal parameter & liable to be maintained in the interest of justice. Therefore, the claim of the appellant is without any cogent proof & justification. Hence, liable to be rejected.
- 6 Incorrect & denied on the grounds that the appellant has not made the said teacher as a private Respondent in the present case on mala-fide intentions just to avoid bringing the factual position before this Tribunal.
- 7 Incorrect & denied. The stand of the appellant is baseless as he has been placed at correct seniority number of 2409 by the Respondent & on the basis of the said he has been promoted against the Subject Specialist Post in BPS-17 by the Respondent Department on grounds of seniority cum-fitness. Hence, the stand of the appellant is liable to be dismissed.
- 8 Incorrect & denied on the grounds that the appellant has been placed at his proper seniority number in the Respondent Department. Hence, the stand of the appellant is based on assumptions.

9. Legal. However, the Respondents further seek leave of this Honorable Tribunal to submit additional grounds, record & case law at the time of arguments.

In view of the above made submissions, it is prayed that this Honorable Tribunal may very graciously be pleased to dismiss the instant Appeal in favor of the Respondent Department in the interest of justice.

Dated \_\_\_ / \_\_\_ /2018

  
Secretary

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.

  
Director

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.

### AFFIDAVIT

I, Hayat Khan Asstt: Director (Lit: II) E&SE Department Khyber Pakhtunkhwa, Peshawar do hereby solemnly affirm & declare on oath that the contents of the instant Parawise Comments in the titled Service appeal are true & correct to the best of my knowledge & belief nothing has been concealed from the ambit of this Honorable Tribunal.

  
Deponent

(A)

(B)

(C)

Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar

No. 2123-26 /A-88/F.S.L SET (M/F) BPS-16

Dated Peshawar the 8/4/2014

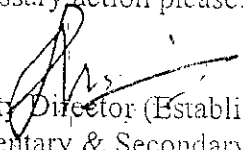
To

- 1- Director Education FATA Peshawar.
- 2- Director of Curriculum & Teacher Education KPK, A.Abad.
- 3- Director of PITE KPK Peshawar.
- 4- All District Education Officers (Male) Khyber Pakhtunkhwa.

Subject:

REVISED FINAL SENIORITY LIST OF SET(MALE) BPS-16

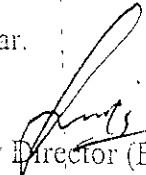
I am directed to submit herewith Revised Final Seniority List of SET (M) BPS-16 stood on 01-04-2014, for perusal and further necessary action please.

  
 Deputy Director (Establishment)  
 Elementary & Secondary Education  
 Khyber Pakhtunkhwa, Peshawar

Endst: No: \_\_\_\_\_/

Copy forwarded for information to the:-

- 1- PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.

  
 Deputy Director (Establishment)  
 Elementary & Secondary Education  
 Khyber Pakhtunkhwa, Peshawar

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REVISED FINAL JOINT SENIORITY LIST OF SETs GENERAL, SCIENCE TECHNICAL AND COMMERCE OF ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTUNKHWA STOOD ON 01.04.2014

No	Name and Qualification	School/Office	Year of B.Ed	Date of Birth / Domicile	Date of Ist. Apptt: in Edu Deptt;	D/o of Apptntt./Appr of SET	Remarks
1	2	3	4	5	6	7	8
	Mr. Wazir Ahmad BA:BEEd	GMS Prang Dara Khy:Agency	1987	13-1-56/Peshawar	1/12/1974	7/9/1988	
	Mr. Fazlur Rehman BA:BEEd	GMS Arawali Kurram Agency	1986	28-3-59/Kurram	3/9/1981	7-9-88	
	Mr. Hanifullah BA:BEEd	GHSS Shaliani Mohmand	1986	16-10-61/Mohmand	2/10/1982	7-9-88	
	Mr. Mubarik Haleem BSc:BEEd	GHS No.1 Tangi Charsadda	1986	10-9-61/Charsadda	1/6/1988	7/9/1988	
	Mr. S. Shah Hussain BA:BEEd	ASDEO (M) A.Abadi	1985	26-6-56/A.Abadi	10/11/1974	22-11-88	
	Mr. Khail muhammad BA:BEEd	GMS Wargosa Swat	1987-88	14-5-65/SWA	27-5-85	2/2/1989	
	Mr. Abdul Akbar Khan MA:BEEd	GHS No.2 Laki Mira Khel Bannu	1981-82	4-1-58/Bannu	14-11-82	1/6/1989	
	Mr. muhammad iqbal BSc:BEEd	GHS Khakki DIKhan	1987-88	6-6-64/DIKhan	1/6/1989	8/6/1989	
	Mr. Muhammad Gul BA BEEd	GMS dale Kot SWA	1989	6.5.56/SWA	9/7/1977	8/6/1989	
	Mr. Iqbal Muhammad BA Bed	GMS Alpuri Swat	1986	5.2.59/Swat	6/10/1980	9.8.89	
	Mr. muhammad Darvez BA:BEEd	GHS Biyar Dir	1987	20-4-57/Dir	26-10-86	1/9/1989	
	Mr. Abdul Haq BA:MEEd	GHS Nihag Dara Dir	1987-88	1-3-64/Dir	2/9/1989	2/9/1989	
	Mr. muhammad Jan Nisar MA:BEEd	GMS Wadpagga Peshawar	1981-82	1-5-54/Peshawar	15-10-73	7.9.89	
	Mr. muhammad Bashir BSc:MA:MEEd	GHS Spin Khak Nowshera	1988	20-4-61/Peshawar	22-12-83	9/9/1989	
	Mr. Asmatullah BA:BEEd	GHS Ahmad Wan SWA	1987-88	15-2-66/SWA	9/9/1989	9/9/1989	
	Mr. Iqbal Khan BA:BEEd	GHS Pashat Bajour Agency	1986	14-8-54/Bajour	21-4-74	12/9/1989	
	Mr. Iqbal Khan	GHS	1988	20.8.58/B Agy	28-11-79	13-9-89	
	Mr. Abdul Manan SET	GMS Kari wran	1989	D.I.Khan	1/10/1983	13-9-89	
	Mr. Iqbal Khan MA:BEEd	GHS No2 Haripur	1988	11-2-57/Haripur	30-4-76	21-9-89	
	Mr. Iqbal Khan MA:BEEd	GHS Garam Mander DIKhan	1982	2-11-57/DIKhan	25-2-73	21-9-89	
	Mr. Iqbal Khan MA:BEEd	GHS Saggi DIKhan	1982	2-9-60/DIKhan	13-11-84	24-9-89	

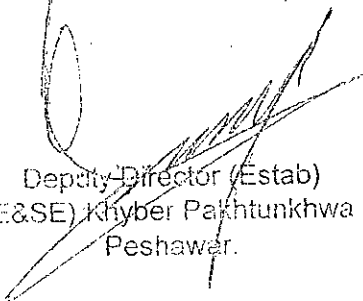
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	Name and Qualification	School/Office	Year of B.Ed	Date of Birth / Domicile	Date of Ist. Appnt:in Edu Deptt;	D/o of Appointt./Appr of SET	Remarks
	2	3	4	5	6	7	8
4043	Nazir Muhammad SET MA B.Ed	GHS Jab Haripur	1993	02.02.1966/Haripur	03.03.1986	01.09.2003	
4044	Mr.Muhammad Azim SET BA BEd	GHS Kaka Khel Tank	1990	15-5-60 / Tank	15.08.1982	01.09.2003	
4045	Muhammad Rauf SET MA (Edu)	GHS Kandu Khel Karak	1990	01.01.1963 / Karak	14.02.1985	01.09.2003	
4046	Muhammad Amin SET	GHS Adina Swabi	1993	08.03.1965/Swabi	01.12.1987	01.09.2003	
4047	Imtiaz Ali Khan SET BA B.Ed	GHS Sudher Swabi	1191	11.01.1968 / Swabi	08.08.1987	01.09.2003	
4048	Azam Khan SET BSc M.Ed	GHSS Phulra Mansehra	1996	31.05.1971 / Mansehra	28.01.1995	01.09.2003	
4049	Bashir Ahmad SET MA B.Ed	GMS Jaban Dargai Malakand	1993	30.10.1963/ Malakand	01.09.2003	01.09.2003	
4050	Sar Anjam Khan SET MA B.Ed	GMS Multan Manji Wala Lakki	1990	04.10.1961 / Lakki	08.04.1981	01.09.2003	
4051	Abdul Akbar Khan SET MA M.Ed	GHS Sharki Hoti Mardan	1995	21.02.1971 / Mardan	23.06.1997	01.09.2003	
4052	Ali Haider SET MA B.Ed	GHS Badraga Malakand	1991	15.09.1960 / Malakand	01.11.1982	01.09.2003	
4053	Zahir Shah SET MA M.Ed	GHS Rehmatullah Shabqadar Fort Charsadda	1993	06.06.1965 / Charsadda	15.10.1988	01.09.2003	
4054	Anwar Sher SET MA B.Ed	GMS Shingri Amazai Haripur	1993	28.05.1964 / Haripur	19.09.1982	01.09.2003	
4055	Chanzeb SET MA (Edu)	GHS Sherwan Abbottabad	1993	09.05.1965 / Abbottabad	01.10.1986	01.09.2003	
4056	Taj Wali Khan SET MA M.Ed	GCMHS Akkora Khattak Nowshera	1993	01.08.1967 / Nowshera	12.01.1988	01.09.2003	
4057	Anwar ul Hassan SET MA M.Ed	GHS Khadagzai Dir (L)	1994	20.09.1967 / Dir (L)	30.01.1991	01.09.2003	
4058	Hidayat Ullah SET MA (Edu)	GHS Khadagzai Dir (L)	1993	02.04.1964 / Dir (L)	20.11.1982	01.09.2003	
4059	Raqib Zada SET BA B.Ed	GHS Pashat Bajour Agy	1993	18.07.1969 / Bajour Agy	01.09.2003	01.09.2003	
4060	Rajab Ali SET MA M.Ed	GHS Kunj Alizai Kurr.Agy	1997	2/4/67/Kurrum	01.03.1993	01.09.2003	
4061	Aminullah SET MA M.Ed	GMS Zarin Garang FR Bannu	1997	17.7.69 / Bannu	01.09.2003	01.09.2003	
4062	Fazal Subhan SET MA B.Ed	GMS Nawagai Swat	1998	01.01.1963 / Swat	07.10.1982	01.09.2003	
4063	Raza Khan SET MA (Edu)	GMS Dagi Ghulam Qadir Khan CHD	1992	03.01.1964 / Charsadda	01.09.2003	01.09.2003	
4064	Muhammad Saddique SET MA (Edu)	GHS No.2 Haripur	1992	28.03.1959/Haripur	10.12.1983	01.09.2003	
4065	Shah Abdul Qadeer SET MA (Edu)	GHS Baidra Mansehra	1992	10.02.1960 / Abbottabad	16.09.2003	16.09.2003	
4066	Muhammad Zahid Ali SET MA B.Ed	GHS No.2 Skhakot Malakand	1997	15.5.68.Momand	01.06.1992	17.09.2003	
4067	Niaz Mir Khan MA M.Ed	GHS Kama Dara Barang Bajour Agy	1997	30.8.67.Bajour	13.10.2003	17.09.2003	
4068	Aftab saeed , SET	GHS,Muhammad Khawaja Hangu		Karak	17.09.2003	17-9-2003	
4069	Azizur Rehman SET MSc M.Ed	GHS Tehkal Payan Peshawar	2000	16.03.1977 / Lakki	17.09.2003	17-9-2003	
4070	Muhammad Sajjad Aqleem SET MA B.Ed	GHS Mitta Khel Karak	1992	05.03.1971 / Karak	14.10.1993	17-9-2003	
4071	Raham Dil Khan, SET	GHS, Dallan Hangu		Karak	16.10.2003	17-9-2003	
4072	Abdur Rashid SET MA M.Ed	GHS Ranwal Tank	2000	12.03.1978 / Tank	24.06.1997	17.09.2003	
4073	Abdul Wahid SET MA M.Ed	GHS Nawan Benda Hangu	2000	01.03.1977 / Karak	17.09.2003	17-9-2003	
4074	Abdul Munir SET	GHS Nawan-kalay Bunir		Bunir	16.10.2003	17-9-2003	

Name and Qualification	School/Office	Year of B.Ed	Date of Birth / Domicile	Date of Ist. Appnt in Edu Dept.	D/o of Appoint/ Appr of SET	Remarks
2	3	4	5	6	7	8
4925	Shafqat Hussain		25.06.1973/A. Abard			
4926	Tahir ud Din, SET	GHS, Sarozai, Hangu	Hangu	1/11/2005	1/11/2005	
4927	Shamsur Rehman, SET	GHS, Lora Abbottabad	Abbottabad	1/11/2005	1/11/2005	
4928	Naeemullah s/o Rahim Dad SET BA BEd	GHS No.4 Mengora Swat	18-4-74/Swat	9/12/1999	1/11/2005	
4929	Noor ul Haq s/o Musharaf Din SET BA BEd	GHS No.1 Tordher Swabi	15.1.78/Swabi	21-10-2004	1/11/2005	
4930	Attaullah, SET BA BEd	GMS Dagg Pattan Kohistan	1.1.74/Kohistan	21-5-92	1/11/2005	
4931	Muhammad Iqbal SET MSc B.Ed	GHS Shergarh Mardan	12.03.1976 / Dir (U)	01.11.2005	01.11.2005	

  
 Deputy Director (Estab)  
 (E&SE) Khyber Pakhtunkhwa  
 Peshawar.

REVISED & UPDATED FINAL SENIORITY LIST OF SUBJECT SPECIALISTS/HEAD MASTERS MALE (B-17) OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA PESHAWAR STOOD ON 23-10-2017

Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st Entry in Edu. Deptt;	Regular appointment/promotion to the present post			Designation/Place of Posting	Remarks
				Reg. Date	Grade	Method of Recruitment		
Muhammad Farooq Khan M.A B.Ed	05/04/1957	Swabi	07/10/1995	25/11/1999	17	By Promotion	SS GHSS Turakai Bunir	
Inayat Ur Rehman M.A B.Ed	12/04/1959	Abbottabad	24/07/1993	23/5/2000	17	By Promotion	SS GHSS-Bur Abbottabad	
Zair Gul MAM.Sc. B.Ed. SS Economics	13/12/1957	Bannu	09/11/1984	31/08/2000	17	By Promotion	SS GHSS Karak	sen.law vd no(a)-57/007 dt 30-10-2008 SS I S.No. 3570/2001
Asmatullah, M.Sc B.Ed	01/02/1975	Peshawar	01.10.2003	23/07/2005	17	By Promotion	SS, Maths, GHSS, Mayar Dir lower	
Abdul Shakoor, M.A B.Ed	17/04/1976	Mansehra	05.11.2003	23/07/2005	17	By Promotion	SS, Eng, GHSS, Dhodial Mansehra	
Muhammad Shakoor S/O Sherzaman SS PS	04.01.1974	Malakand	10.04.2006	10.04.2006	17	D>Selectee	SS PS GHSS Palal Malakand	Reinstated vide No. 10(SM) E&SED /4-17/2012, M. Shakoor SS Dated 24.08.2011
Noorani Shah s/o Amin Khan M.A B.Ed	05/01/1952	Lakki Marwat	19-09-1990	24.09.2007	17	D>Selectee	HM GHS Tough Sarai Hangu	SO(S)3-2266/11(M) dt 24.09.2007(Ment 07/2004)
Mr. Gul Rukhan M.A B.Ed	09/10/1958	NWA	15/02/1981	05/03/2006	17	By Promotion	HM C/O FATA	
Mr. Sa'id Wali, M.A B.Ed	10/10/1958	Mardan	21/04/1981	05/03/2006	17	By Promotion	HM, GHS, Rotakara Swabi	
Mr. Muhammad Javed, M.A B.Ed	16/04/1959	D.I.Khan	10/01/1981	05/03/2006	17	By Promotion	HM, GHS, Rori D.I.Khan	
Mr. Sultan Muhammad, M.A B.Ed	02/10/1953	Charsadda	07/09/1989	05/03/2006	17	By Promotion	HM GHS, Turangzal Charsadda	
Mr. Ahmad Ghazi, M.A B.Ed	15/01/1959	Chitral	25/11/1981	06/03/2006	17	By Promotion	HM, GHS, Asherate, Chitral	
Mr. Zahid Ahmad, M.A B.Ed	04/04/1958	Charsadda	03/01/1982	05/03/2006	17	By Promotion	HM, GHS, Behlola Charsadda	
Mr. Sher Daraz Khan, M.A M.Ed	12/10/1959	Bannu	01/01/1982	03/05/2006	17	By Promotion	HM GHS Bilawar Khan, Bannu	
Mr. Dilbar Khan, M.A B.Ed	10/01/1952	Dir	07/09/1970	21/04/2007	17	By Promotion	HM, GHS, Mirabal Dir (L)	
Mr. Afzar Khan, M.A B.Ed	10/01/1958	NWA	03/01/1982	21/04/2007	17	By Promotion	HM, GHS, C/O FATA	
Mr. Abdur Rashid, M.A M.Ed	10/01/1958	Lakki Marwat	09/03/1982	21/04/2007	17	By Promotion	HM, GHS, Tabi Murad Lakki	
Mr. Ghulam Muraza, M.A B.Ed	10/01/1958	Mansehra	13/09/1982	21/04/2007	17	By Promotion	HM, GHS, Takra Mansehra	
Mr. Mohammad Said, M.A B.Ed	04/01/1958	Bajour Agency	19/09/1978	21/04/2007	17	By Promotion	HM, GHS, C/O FATA	
Mr. Jehanzeb Shah, M.A B.Ed	05/11/1958	Swabi	10/01/1980	21/04/2007	17	By Promotion	HM, GHS, Jagan Nath Swabi	
Mr. Kamazur Khan, M.A B.Ed	10/01/1960	Chitral	11/11/1982	21/04/2007	17	By Promotion	HM, GHS, Sweer Chitral	
Iqbal ur Raaman S/O Sher Zain SS Pak. Studies	15/04/1966	Karak	15/11/1994	01/01/2008	17	By Promotion	SS GHSS Dabli Lawaghar Karak	SO(PE) E&SED/7-9/2010 Prom. to SS dated 5.12.2012(Court Decision)
Muhammad Issa Khan s/o Mosa Khan SS (Economics)	10/04/1975	Swat	26/02/2008	26/02/2008	17	D>Selectee	SS GHSS Kabal Swat	no correction his position his s/no 147 is correct
Hafiz Muhammad Rasool s/o Mureed Rasool SS (Islamic)	27/03/1958	Chitral	17/07/2008	17/07/2008	17	D>Selectee	SS GHSS Jaloza Noshehra	SO(S)3-22026/03(M) dt 17-07-2008 (Merit 02/2007)
Riaz Khan s/o Mira Jan SS (Economics)	01/02/1982	Mohmand Agency	26/02/2008	26/02/2008	17	D>Selectee	SS GHSS Manga Dargai Charsadda	SO(S)3-22026/03(M) dt 26.02.2008 (Merit 02/2007)
Zahid Rafiq s/o Muhammad Rafiq SS (Economics)	05/02/1980	Charsadda	26/02/2008	26/02/2008	17	D>Selectee	SS Gh-SS Nissara Charsadda	
Farooq Khan s/o Sheria Muhammad SS (Islamic)	03/01/1980	Dir	26/02/2008	26/02/2008	17	D>Selectee	SS GHSS Haya Dheri Dir (L)	
Mr. Farid ur Rehman s/o Molyk Abdul Haq SS (Islamic)	19/01/1965	Mardan	17/07/2008	17/07/2008	17	D>Selectee	SS GHSS No.1 Mardan	SO(S)3-22026/03(M) dt 17.07.2008 (Merit 02/2007)
Mr. Muhammad Saif Wali Muhammad SS (Economics)	15/11/1970	Peshawar	26/02/2008	26/02/2008	17	D>Selectee	SS Gh-SS Nahaji Peshawar	SO(S)3-22026/03(M) dt 26.02.2008 (Merit 02/2007)
Mr. Muhammad s/o Zaini Shah SS (Economics)	18/12/1977	Mansehra	26/02/2008	26/02/2008	17	D>Selectee	SS Gh-SS Khashti Bajour Peshawar	SO(S)3-22026/03(M) dt 26.02.2008 (Merit 02/2007)
Mr. Muhammad s/o Faraiz Khan SS (Economics)	27/05/1972	Charsadda	26/02/2008	26/02/2008	17	D>Selectee	SS Gh-SS Hassan Za Charsadda	SO(S)3-22026/03(M) dt 26.02.2008 (Merit 02/2007)

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C.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st Entry in Edu; Dept;	Regular appointment/ promotion to the present post			Designation/Place of Posting	Remarks
					Reg. Date	Grade	Method of Recruitment		
2349	Mehraban Khan M.A B.Ed M.Sc. V.Ed.	20/05/1965	Haripur	14/10/1987	17/03/2016	17	By Promotion	SS B-17 (Pak Study) GHSS Bireto, Abbotabad	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2350	Muhammad Ayub Khan M.A B.Ed MA (Edu)	22/11/1966	Lakki Marwat	25/11/1985	17/03/2016	17	By Promotion	SS B-17 (Economics) GHSS Kheru Khel Pailva Lakki	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2351	Shabir Ahmad M.A B.Ed BA Bed	16/04/1960	Lakki Marwat	21/10/1984	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Mandra Kalan, D.I.Khan	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2352	Faiz ur Rehman M.A B.Ed MA M.Ed	16/09/1962	D.I.Khan	19/11/1987	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Paharpur, D.I.Khan	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2353	Rehmat Ullah M.A B.Ed MA B.Ed	23/08/1965	Lakki Marwat	22/10/1983	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Kachi Pindha Khel, D.I.Khan	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2354	Safeer Ullah Khan M.A B.Ed MA B.Ed	07/10/1963	Bannu	24/11/1985	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Ibrahimzai, Hangu	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2355	Muhammad Subhan M.A B.Ed MA M.Ed	20/08/1964	Mansehra	18/04/1985	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Battal, Mansehra	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2356	Muhammad Iqbal M.A B.Ed M.Sc M.Ed	25/01/1961	Swat	01/09/2003	17/03/2016	17	By Promotion	SS B-17 (Pak Study) GHSS Bamakhela, Swat	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2357	Muhammad Younis M.A B.Ed MA (Edu)	16/11/1965	Mansehra	02/10/1985	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Dabola, Abottabad	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2358	Muhammad Saeed Akhtar M.A B.Ed MA (Edu)	15/03/1965	Mansehra	29/09/1986	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Trippi, Mansehra	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2359	Khalid Mehmood M.A B.Ed MA M.Ed	01/12/1958	Mansehra	09/10/1984	17/03/2016	17	By Promotion	SS B-17 (Economics) GHSS Kahal Haripur	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2360	Muhammad Saeed M.A B.Ed MA (Edu)	11/12/1963	Mansehra	17/01/1986	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Parhina, Mansehra	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2361	Ashraf Khan M.A B.Ed M.Sc M.Ed	05/06/1964	Swabi	28/02/1980	17/03/2016	17	By Promotion	SS B-17 (Maths) GHSS Maneri Swabi	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2362	Muhammad Asif Iqbal M.A B.Ed MA M.Ed	01/09/1966	Nowshera	12/09/1989	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Rashaia, Nowshera	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2363	Jehanzeb M.A B.Ed M.Sc B.Ed	12/04/1966	Karak	23/05/1992	17/03/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Sheikhan, Peshawar	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2364	Muhammad Nisar MA M.Ed	30/03/1961	Mohmand Agency	25/12/1984	17/03/2016	17	By Promotion	SS B-17 (English) GHSS Hassanai, Charsadda	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2365	Amir Khan M.A M.Ed	07/06/1966	Mohmand Agency	21/07/2003	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Dargai, Charsadda	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2366	Ardar Ali Khan M.A B.Ed M.Sc M.Ed	01/12/1968	Bannu	01/04/1992	17/03/2016	17	By Promotion	SS B-17 (Physics) GHSS Hazar Khwani, Peshawar	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2367	Muhammad Fayaz M.A B.Ed MA M.Ed	01/04/1972	Peshawar	07/01/1991	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Sufaid Sang, Peshawar	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2368	Saleem Ullah Khan MA M.E	18/12/1969	Bannu	08/01/1991	17/03/2016	17	By Promotion	SS B-17 (Hist cum Civics) GHSS Daraka Aziz Khan, Lakh	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2369	Ghulam Farooq M.A B.Ed M.Sc M.Ed	10/02/1953	Kohat	13/11/1986	17/03/2016	17	By Promotion	SS B-17 (Physics) GHSS Musim Abad, Kohat	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2370	Maqbool Khan M.A B.Ed M.Sc M.Ed	16/03/1969	Karak	17/11/1994	17/03/2016	17	By Promotion	SS B-17 (Maths) GHSS Amandi Umar Khan Bannu	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2371	Ram Nawaz M.A B.Ed M.Sc M.Ed	01/09/1971	Karak	23/09/1995	17/03/2016	17	By Promotion	SS B-17 (Physics) GHSS Dhand Saghail, Kohat	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2372	Sajdar Ali M.A B.Ed M.Sc M.Ed	01/09/1970	Wardan	07/01/1997	17/03/2016	17	By Promotion	SS B-17 (Physics) GHSS Gajjar, Wardan	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2373	Sajdar Ali M.A B.Ed M.Sc M.Ed	10/12/1970	Peshawar	17/03/1992	17/03/2016	17	By Promotion	SS B-17 (Economics) GHSS Ghalaisher, Wardan	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2374	Raza Ali M.A B.Ed MA M.Ed	10/12/1970	D.I.Khan	12/01/1988	17/03/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Raza D.I.Khan	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2375	Muhammad Asif M.A B.Ed M.Sc M.Ed	10/03/1958	Swab	05/05/1989	17/03/2016	17	By Promotion	SS B-17 (Maths) GHSS Nare Banda, Swab	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016
2376	Muhammad Asif M.A B.Ed M.Sc M.Ed	01/03/1971	Bannu	01/09/1994	17/03/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Landwa, Lark	No.SQ(PE)2-60/PC Meeting/SST-SS(20-10-2015) dated 17-03-2016

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SHOP

Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st Entry in Edu; Deptt;	Regular appointment/promotion to the present post			Designation/Place of Posting	Remarks
				Reg. Date	Grade	Method of Recruitment		
Jehanzeb MSc B.Ed SS (Che)	02/01/1970	Bannu	17/11/1995	17/03/2015	17	By Promotion	Services placed at the disposal of Director Education FATA	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2407 Sabir Hussain MSc B.Ed. SS (Che)	18/04/1968	Khunram Agency	09/06/1990	17/03/2015	17	By Promotion	Services placed at the disposal of Director Education FATA	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2408 Qareebullah M.A B.Ed MSc M.Ed	03/05/1957	Mohmand Agency	09/01/1999	17/03/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Palo Dheri Mardan	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2409 Taj Wali Khan M.A B.Ed MA M.Ed	01/08/1967	Nowshera	12/01/1988	17/03/2016	17	By Promotion	SS B-17 (English) GHSS Jehangira Swabi	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2410 Aziz ur Rehman M.A B.Ed MSc M.Ed	16/03/1977	Lakki Marwat		17/03/2016	17	By Promotion	SS B-17 (Statistics) GHSS Nowshera Kalan	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2411 Rahim Dil Khan, M.A B Ed	10/09/1972	Karak	16/10/2003	17/03/2016	17	By Promotion	SS B-17 (Statistics) GHSS Lalozai, Bannu	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2412 Rehman Janan M.A B Ed MA M.Ed	01/03/1977	Karak	16/10/2003	17/03/2016	17	By Promotion	SS B-17 (History Civics) GHSS Daffan, Hangu	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2413 Roshan Islam s/o Muhammad Saeed M.A B.Ed	15/04/1975	Karak	19/04/1999	17/03/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Parahinzai, Hangu	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2414 Dilawar Khan M.A B Ed MA B Ed	15/03/1974	Karak	16/10/2003	17/03/2016	17	By Promotion	SS B-17 (English) GHSS Muskh Anad, Kohat	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2415 Ijaz Saud M.A B.Ed MSc M.Ed	05/05/1959	Kohat	16/10/2003	17/03/2016	17	By Promotion	SS B-17 (Economics) GHSS Daffan, Hangu	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2416 Shah Sawar Khan M.A B.Ed MSc M.ED	05/12/1971	Kohat	16/10/2003	17/03/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Malikhet Jamkhet Bannu	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2417 Muhammad Tariq Javed M.A B Ed MSc M. Ed	12/04/1975	D.I Khan	16/02/1998	17/03/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Kach, Paband Khan, D.I Khan	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2418 Tariq Mahmood Khan M.A B.Ed BA B.Ed	11/05/1968	D.I Khan		17/03/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Dhalla, D.I Khan	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2419 Ishfaq Ahmad M.A B Ed MSc M.Ed	22/05/1976	Karak	17/09/2003	17/03/2016	17	By Promotion	SS B-17 (Chemistry) GHSS Bahadar Khel Karak	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2420 Muhammad Nawaz MA B.Ed SS (Eng)	01/01/1970	Khyber Agency	18/09/2003	17/03/2016	17	By Promotion	Services placed at the disposal of Director Education FATA	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2421 Kaleem Ullah M.A B.Ed MA M.Ed	12/10/1975	FR Bannu	18/09/2003	17/03/2016	17	By Promotion	SS B-17 (English) GHSS Abdul Khel, Lakki	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2422 Barkat Shah M.A B.Ed MA M Ed	01/03/1959	FR Bannu	16/10/2003	17/03/2016	17	By Promotion	Services placed at the disposal of Director Education FATA	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2423 Javed Khan MSc M Ed SS (Phy)	04/03/1974	Khyber Agency		17/03/2016	17	By Promotion	Services placed at the disposal of Director Education FATA	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2424 Sadiqur Rehman M.A B Ed MSc M. Ed	11/03/1959	Malakand	02/10/2003	17/03/2016	17	By Promotion	SS B-17 (Maths) GHSS Mian Brangela, Or Lower	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2425 Muhammad Salahud Din MSc M.Ed	30/03/1969	FR Bannu	04/10/2003	17/03/2016	17	By Promotion	SS B-17 (Physics) GHSS Palinda Khel, Bannu	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2426 Mujeeb ur Rehman MSc B.Ed SS (Che)	10/01/1974	FR Bannu	04/10/2003	17/03/2016	17	By Promotion	Services placed at the disposal of Director Education FATA	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2427 Shah Bahadar MSc M.Ed SS (Chr)	08/10/1970	Bajaur Agency		17/03/2016	17	By Promotion	Services placed at the disposal of Director Education FATA	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2428 Muhammad Alam M.A B Ed MA M.Ed	30/09/1959			17/03/2016	17	By Promotion	SS B-17 (Statistics) GHSS Topan, Bannu	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2429 Syed Asif Hussain Shah M.A B Ed MA B Ed	06/03/1970	Mansehra	07/10/2003	17/03/2016	17	By Promotion	SS B-17 (Biology) GHSS Doga, Mansehra	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2430 Abdul Majid M.A B.Ed MA M. Ed	03/05/1971	Mansehra		17/03/2016	17	By Promotion	SS B-17 (English) GHSS Faran, Mansehra	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2431 Abdul Rahman M.A B.Ed MSc M. Ed	07/02/1976	Swat		17/03/2016	17	By Promotion	SS B-17 (English) GHSS Kishawra, Swat	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2432 Muhammad Fareem M.A B Ed MA M.Ed	01/06/1978	Swat	31/10/2003	17/03/2016	17	By Promotion	SS B-17 (English) GHSS Shehar, Peshawar	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2433 Naseer Ahmad M.A B.Ed MSc M. Ed	02/04/1976	Mardan	31/10/2003	17/03/2016	17	By Promotion	SS B-17 (Maths) GHSS Ludman Bar, Or Lower	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2434 Mustafa Anwar MSc M.Ed Ph.D	01/01/1972	Charsadda	11/02/1998	17/03/2016	17	By Promotion	SS B-17 (Economics) GHSS Charsadda No. 1	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015
2435 Shaukat Ali M.A B Ed MSc B.Ed	01/12/1975	Attock		17/03/2016	17	By Promotion	SS B-17 (Physics) GHSS Kach, Paband	No. SO(PE)2-6/OPC Meeting/ST-SS(20-10-2015) dated 17-03-2015

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Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry in Edu; Dept;	Regular appointment/promotion to the present post			Designation/Place of Posting	Remarks
				Reg. Date	Grade	Method of Recruitment		
Mohammad Ilyas M.Sc B.Ed	06/04/1974	Malakand	25/11/2008	30/05/2017	17	Do		
3382 Sarwatul M.A M.Ed	14/08/1976	Swabi	10/02/2007	30/05/2017	17	Do	SS (Statistics) BS-17 GHSS Sasnot, Malakand	
3383 Shah Jehan M.Sc M.Ed	05/02/1978	Swabi	26/11/2008	30/05/2017	17	Do	SS (Economics) BS-17 GHSS Panjori, Swabi	
3384 Saif Ullah M.A M.Ed SS (Eco)	20/11/1978	SWA	25/11/2008	30/05/2017	17	Do	SS (Biology) BS-17 GHSS Jehangira Swabi	
3385 Suraj Khan M.Sc B.Ed SS (Bio)	11/03/1979	FR Bannu	25/11/2008	30/05/2017	17	Do	Services placed at the disposal of ACS FATA	
3386 Sajad Haider M.Sc B.Ed SS (Bio)	13/03/1981	SWA	25/11/2008	30/05/2017	17	Do	Services placed at the disposal of ACS FATA	
3387 Azmat Af. M.A M.Ed	15/06/1976	Abbottabad	25/11/2008	30/05/2017	17	Do	Services placed at the disposal of ACS FATA	
3388 Muhammad Rehman M.A M.Ed SS (Eco)	15/01/1977	NWA	25/11/2008	30/05/2017	17	Do	SS (Economics) BS-17 GHSS Phafra, Mansehra	
3389 Muhammad Ashraf Khan M.A M.Ed SS (Eco)	01/09/1978	NWA	01/10/2009	30/05/2017	17	Do	Services placed at the disposal of ACS FATA	
3390 Nasrullah M.A M.Ed	11/03/1980	Swabi	25/11/2008	30/05/2017	17	Do	Services placed at the disposal of ACS FATA	
3391 Akhul Waheed M.A B.Ed	01/04/1981	D.I.Khan	02/10/2007	30/05/2017	17	Do	SS (Economics) BS-17 GHSS Dahan, Swabi	
3392 Iqbal Hussain M.Sc M.Ed SS (Stat)	02/12/1983	FR Lakki	17/12/2008	30/05/2017	17	Do	SS (Economics) BS-17 GHSS Chaudwan, D.I.Khan	
3393 Akhul Waheed M.A M.Ed	07/02/1984	D.I.Khan	25/11/2008	30/05/2017	17	Do	Services placed at the disposal of ACS FATA	
3394 Asif Nawaz M.Sc B.Ed	03/12/1977	D.I.Khan	02/07/2007	30/05/2017	17	Do	SS (Economics) BS-17 GHSS Abdul Khel, D.I.Khan	
3395 Faqhar Abbas M.Sc B.Ed	20/12/1978	D.I.Khan	17/09/2008	30/05/2017	17	Do	SS (Statistics) BS-17 GHSS Hathala D.I.Khan	
3396 Iqbal Hussain M.A M.Ed	10/11/1980	Dir Upper	02/10/2007	30/05/2017	17	Do	SS (Statistics) BS-17 GHSS Kotla, D.I.Khan	
3397 Hashmat Af. M.Sc M.Ed	10/03/1985	D.I.Khan	02/10/2007	30/05/2017	17	Do	SS (Economics) BS-17 GHSS Akhagram, Dir Upper	
							SS (Physics) BS-17 GHSS Kacha Mali Khel, D.I.Khan	

## CERTIFICATE

It is certified that the above seniority list is

- 1 Widely circulated.
- 2 Undisputed/Uncontroverted.
- 3 No litigation is pending/involved.

Deputy Director (Establishment)  
Directorate of E&SE Khyber Pakhtunkhwa  
Peshawar

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

Service Appeal No. 914/2018

Taj Wali Khan..... Vs..... Govt of KPK & others

**REJOINDER ON BEHALF OF THE**  
**APPELLANT**

**Preliminary Objections:**

**Respectfully Sheweth:**

1. Contents incorrect and misleading, the appellant has not been given his new seniority, thus he being an aggrieved civil servant has got the cause of action to file the instant appeal and locus standi as well.
2. Contents incorrect and misleading, the instant appeal is well within time.
3. Contents incorrect and misleading, nothing has been concealed from this Hon'ble Tribunal.
4. Contents incorrect and misleading, the appeal is filed well in accordance with rules and laws.
5. Contents incorrect and misleading, appellant has come to this Hon'ble Tribunal with clean hands.
6. Contents incorrect and misleading, all the necessary parties required for the just disposal of the appeal have been arrayed as party.
7. Contents incorrect and misleading, rule of estoppels is not applicable in the instant case.



8. Contents incorrect and misleading, the instant appeal is well maintainable in its present form.
9. Contents incorrect and misleading, appeal is well in accordance with rules and law.
- 10-11. Contents incorrect and misleading, the impugned seniority list is effective as the appellant has not been given his due seniority in the said seniority list.

**On Facts**

1. Para No. 01 of the appeal is incorrect, reply to the para is incorrect hence denied. The appellant submitted all his credentials bill within time.
2. Para No. 02 of the appeal need no comments.
3. Para No. 03 of the appeal is incorrect, reply to the para is incorrect hence denied.
4. Para No. 04 of the appeal is incorrect, reply to the para is incorrect hence denied.
5. Para No. 05 of the appeal is incorrect, reply to the para is incorrect hence denied. The appellant has already annexed his application along with his service appeal.
6. Para No. 06 of the appeal is incorrect, reply to the para is incorrect hence denied.
7. Para No. 07 of the appeal is incorrect, reply to the para is incorrect hence denied.

8. Para No. 08 of the appeal is incorrect, reply to the para is incorrect hence denied. The applicant filed the objection on the tentative seniority list however no action was taken on it.

9. Para No. 09 of the appeal is incorrect, reply to the para is incorrect hence denied. The appellant has filed his departmental appeal well within prescribed time.


**Grounds:**

Grounds taken in the memo of appeal are legal and will be substantiated at the time of arguments.

**It is, therefore, most humbly prayed that the appeal of the appellant may please be accepted as prayed for.**

  
Appellant

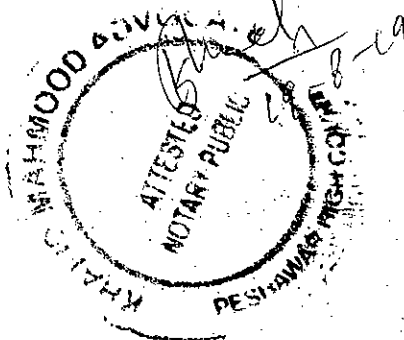
Through

  
**Yasir Saleem,**  
Advocate, High Court  
Peshawar

Date: 19.08.2019

**AFFIDAVIT**

It is solemnly affirm and declare on oath that the contents of the **rejoinder** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



**DEPONENT**