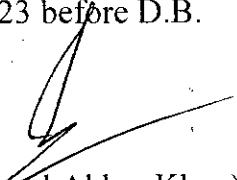



10<sup>th</sup> April, 2023 1. Learned counsel for the appellant present. Mr. Fazal Shah Mohmand, Addl: AG for official respondents present.

2. On the previous date last chance was given to both the parties to argue the case on the next but today nobody present on behalf of private respondents, therefore, they are placed ex-parte. To come up for arguments on 31.05.2023 before D.B.

SCANNED  
KPTST  
PESHAWAR

  
(Muhammad Akbar Khan)  
Member (E)

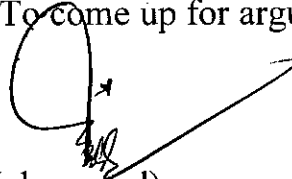
  
(Kalim Arshad Khan)  
Chairman

10.01.2023

Learned counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for official respondents No. 1 to 4 present. Learned counsel for private respondents No. 6 to 9, 10, 13, 14, 15 also present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments on 28.02.2023 before the D.B.

SCANNED  
KPS  
PESHAWAR



(Mian Muhammad)  
Member (E)



(Salah-Ud-Din)  
Member (J)

28. 02. 2023

Counsel for the appellant present. Mr. Umair Azam, learned Additional Advocate General for official respondents present. Junior to counsel for private respondents No. 6 to 9, 10, 13, 14 & 15 present.

Junior to counsel for private respondents requested for adjournment on the ground that learned counsel for the appellant is busy before MTI Tribunal. Last chance is given to both the parties to argue the case failing which the case will be decided on the basis of available record.

To come up for arguments on 10.04.2023 before D.B. P.P given to the parties.

SCANNED  
KPS  
PESHAWAR



(Rozina Rehman)  
Member (J)



(Kalim Arshad Khan)  
Chairman

06 September, 2022

Appellant present in person. Mr. Kabirullah Khattak,  
Addl. AG for the official respondents No. 1 to 4 present.  
Counsel for private respondents No. 6 to 10 and 13 to 15  
present.

Reply/comments of respondents No. 6, 7, 8, 9, 10, 13,  
14 & 15 received which is placed on file. Remaining  
respondents have not submitted reply/comments despite last  
chance, hence their right to submit reply is struck off. To come  
up for arguments on 15.11.2022 before the D.B.

  
(Kalim Arshad Khan)  
Chairman

15<sup>th</sup> Nov. 2022 Counsel for the appellant present.

Mr. Naseerud Din Shah, Assistant Advocate General for the  
respondents No. 1 to 3 and counsel for private respondents present.

Learned counsel for the parties requested for adjournment in  
order to further prepare the brief. Adjourned. To come up for  
arguments on 10.01.2023 before the D.B. v

  
(FAREEHA PAUL)  
Member(E)

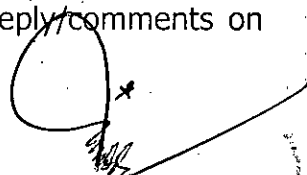
  
(ROZINA REHMAN)  
Member (J)

SCANNED  
KPST  
Peshawar

24.05.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG for official respondents present. Syed Noman Ali Bukhari, Advocate present and submitted Vakalatnama on behalf of respondents No. 6, 7, 8, 10, 14 & 15 which is placed on file. None present on behalf of private respondents No. 5, 9, 11 to 13 & 16.


Written reply/comments on behalf of official respondents as well as private respondents not submitted. Learned AAG for official respondents No. 1 to 4 and counsel for private respondent No. 6, 7, 8, 10, 14 & 15 sought time for submission of written reply/comments. Notice be issued to private respondents No. 5, 9, 11 to 13 & 16 to submit written reply/comments. To come up for written reply/comments on 05.07.2022 before S.B.

  
(Mian Muhammad)  
Member (E)

05<sup>th</sup> July, 2022

Appellant alongwith his counsel present. Mr. Kabir Ullah Khattak, Additional AG for official respondents present. Mr. Syed Noman Ali Shah Bukhari, Advocate present and submitted wakalatnama on behalf of private respondents No. 9 & 13 which is placed of file. None present on behalf of private respondents 5,11,12 & 16.

Written reply/comments on behalf of official respondents as well as private respondents not submitted. Learned AAG for official respondents No.1 to 4 and counsel for private respondents No.6 to 10 and 13 to 15 seeks time for submission of written reply/comments. Notice be issued to private respondents No.5,11,12 & 16. Last chance is given to official respondents as well as private respondents to submit written reply/comments. To come up for written reply/comments on 06.09.2022 before S.B.

  
(Kalim Arshad Khan)  
Chairman

22.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 18.04.2022 for the same as before.

  
Reader

18.04.2022

Counsel for the appellant present. Mr. Naseer-ud-Din Shah Assistant AG for the official respondents present. Private respondents No.7 to 10, 14 and 15 present in person.

Written reply/comments on behalf of respondents not submitted. Learned Assistant AG seeks time for submission of written reply/comments. Last opportunity is granted for submission of written reply/comments. To come up for written reply/comments on 24.05.2022 before S.B.



CHAIRMAN

25.10.2021

Counsel for the appellant present. Preliminary arguments heard.

SCANNED  
KPST  
Peshawar

Learned counsel for the appellant contends that the appellant has been deprived from promotion on the basis of his entitlement under 33% quota reserved for class-IV employees despite being junior than him have been promoted vide order dated 07.06.2021. The appellant filed departmental appeal on 08.06.2021 with cogent ground which was rejected on 23.08.2021 without any reason. The service appeal having been filed on 30.08.2021 is well within time. Points raised need consideration. Subject to all legal and factual objections, this appeal is admitted for full hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 22.02.2022 before the D.B.

Appellant Deposited  
Security Process Fee

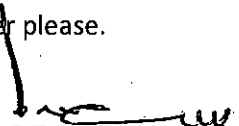

Chairman

Form- A

FORM OF ORDER SHEET

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

Case No.- 7358 /2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/09/2021	<p>The appeal of Mr. Muhammad Muneeb resubmitted today by Mr. Zia Ur Rehman Tajik Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>25/10/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Muhammad Muneeb , District Nowshera presented today i.e. on 30.08.2021 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Appeal has not been flagged/marked with annexures marks.
- 2- Certificate be given to the effect that the appellatant has not been filed any service appeal earlier on the subject matter before this Tribunal.

No. 1698 /S.T,


Dt. 01/09 /2021

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Zia Ur Rehman Tajik ASC.

Sir,

objection after remove file resubmitted  
file up put up the court



Zia-ur-rehman Tajik  
Advocate Supreme court  
Dated 01-09-2021



**BEFORE THE HON'BLE SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. 7358 -P/2021

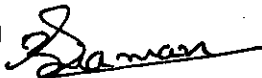
Muhammad Muneeb Versus Director E&SE KPK etc.

**INDEX**

S. No.	Description of documents	Annexs	Pages
1.	Appeal alongwith affidavit		1-7
2.	Addresses of parties		8-10
3.	Copy of the B.A Degree, Charge Report alongwith typing and shorthand certificate & character certificate	A to A/4	11-14/A
4.	Copy of Seniority Certificate	B	15
5.	Copy of promotion Order dated 07.06.2021	C	16-17
6.	Copy of the Departmental Representation alongwith dismissal order dated 23.08.2021.	D & E	18-20
7.	Notice		21-23
8.	Wakalatnama		24

  
Appellant

Through

  
**Zia ur Rahman Tajik**  
**LLB.LLM, Sharia Law**  
Advocate, Supreme Court.

  
**Malik Ihtisham-ul-Haq Khan**  
Advocate High Court(s)

Tajik Law Associates & Legal Consultant  
Flat No. 01, Fourth Floor, the  
Cantonment Mall,  
Fakhr-e-Alam Road, Peshawar Cantt.  
Cell # 0300-9357932

**BEFORE THE HON'BLE SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No. \_\_\_\_-P/2021

Muhammad Muneeb s/o Khanzada  
(Chowkidar/Class-IV)  
Government Girls Primary School No.02,  
Saleh Khana Tehsil Pabbi,  
District Nowshehra.

.....**Appellant.**

**Versus**

1. Director,  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa,  
Peshawar.
2. District Education Officer/D.E.O (Female),  
District Nowshehra.
3. District Monitoring Officer,  
Nowshehra.
4. Deputy Commissioner,  
District Nowshehra.
5. Muhammad Farooq s/o Saraf Khan (Junior Clerk)  
Government Girls Higher Secondary School Rashakai.

6. Tufail (Junior Clerk)  
Government Girls Higher Secondary School  
ASC Nowshehra.
7. Noor Muhammad s/o Afzal Khan (Junior Clerk)  
Government Girls Higher Secondary School Azakhel Payan  
District Nowshehra.
8. Gul Muhammad s/o Taj Muhammad (Junior Clerk)  
Government Girls Higher Secondary School Dagai Qadeem.
9. Fazl-e-Ahad s/o Said Mehmoode (Junior Clerk),  
Government Girls Higher Secondary School Dhery Kathikhel,  
District Nowshehra.
10. Sarfaraz Khan s/o Fazl-e-Malik (Junior Clerk)  
Government Girls Higher Secondary School,  
Nowshehra Canntt.
11. Hayatullah s/o Wali Ullah (Junior Clerk)  
Government Girls Higher Secondary School Dagbesud,  
District Nowshehra.
12. Munjamil Khan s/o Ghayas-Ud-Din (Junior Clerk)  
Government Girls Higher Secondary School Nodh  
District Nowshehra.
13. Rattan Kumar s/o Kishan Lal (Junior Clerk)  
Government Girls Higher Secondary School Marhati Banda  
District Nowshehra.
14. Muhammad Ismail s/o Lawar Khan (Junior Clerk)  
Government Girls Higher Secondary School Kotli Kalan,  
District Nowshehra.

15. Luqman Gul s/o Arman Gul (Junior Clerk)  
Government Girls Higher Secondary School Mandori,  
District Nowshehra.

16. Muhammad Arif s/o Mohy-Ud-Din (Junior Clerk)  
Government Girls Higher Secondary School,  
Jalozai Nowshehra.

.....Respondents.

**APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT, 1974 AGAINST  
THE IMPUGNED ORDER DATED 23.08.2021 PASSED BY RESPONDENT  
NO.01 WHEREBY DEPARTMENTAL APPEAL/REPRESENTATION OF  
APPELLANT DATED 28.06.2021 HAS BEEN TURNED DOWN WHEREAS  
PROMOTION ORDER DATED 07.06.2021 REMAINED INTACT.**

**PRAYER:**

**ON ACCEPTANCE OF INSTANT APPEAL THE IMPUGNED ORDER DATED  
23.08.2021 MAY KINDLY BE SET ASIDE AND OFFICIAL RESPONDENTS  
MAY BE DIRECTED TO PROMOTE THE APPELLANT TO THE POST OF  
JUNIOR CLERK BPS-11 UNDER 33% QUOTA OF CLASS-IV EMPLOYEES.**

**Respectfully Sheweth:**

/ That the appellant who is a graduate alongwith typing and shorthand  
experience was appointed as Class-IV vide appointment Order dated  
24.06.1999 whereafter the appellant duly took his charge. Copies of B.A  
Degree, Charge Report alongwith typing and shorthand certificate are  
enclosed as annexure "A", "A/1", "A/2" and "A/3".

- 2. That in the Seniority List 2021 issued by the respondent No.02 on 21.01.2021 the appellant was placed at Serial No.04 on the basis of his seniority. Copy of Seniority Certificate is enclosed as annexure "B".
- 3. That on 07.06.2021 promotion orders of private respondents were issued by respondent No.02 not only in sheer disregard of the law, rules and regulations for promotion on the basis of 33% quota of class-IV employees but have also superseded the appellant who is the senior most on the Seniority List, 2021. Copy of promotion order dated 07.06.2021 is enclosed as annexure "C".
- 4. That feeling aggrieved of the impugned promotion orders dated 06.07.2021 whereby the private respondents No.5-16 are promoted to the post of Junior Clerk (BPS-II) the appellant filed a Departmental Representation with respondent No.01 on 08.06.2021 which Departmental Representation was dismissed on 23.08.2021 with a single blot of pen illegally, maliciously, in sheer disregard of law and the same dismissal was nowhere justified with any reasons which is contrary to law, rules and the dicta laid down by the apex Court. Copy of the Departmental Representation alongwith dismissal order dated 23.08.2021 are enclosed as annexure "D" and "E".

Now the appellant feeling aggrieved from the impugned promotion order dated 07.06.2021 issued by respondent No.02 and dismissal order dated 23.08.2021 passed by the respondent No.1 approaches this Hon'ble Tribunal for the redressal of his grievance inter alia on the following amongst other:

**GROUND:**

- A. That the appellant has not been treated in accordance with law despite being strongly entitled to be promoted as per the Seniority List, 2021 at serial. No.4.

- B. That the impugned illegal promotions of the private respondents i.e. respondents No.5-16 who are way too far in the Seniority List, 2021 as against the appellant are totally unlawful, against the law and principles of Natural Justice, infact the impugned promotions are made by the respondent No.1 and 2 in sheer disregard of the expressed provisions of the Constitution of Islamic Republic of Pakistan, 1973, malafidely, and just inorder to accommodate their blue eyed chaps ~~who are otherwise related to the ruling party~~. Furthermore the same impugned promotion orders of respondents No.5 to 16 are illegal and ineffective upon the rights of the appellant.
- C. That the Departmental Representation of the appellant has been dismissed with a single stroke of a pen by the respondent No.1 without application of any legal and reasonable prudent mind in utter disregard of section 24-A of General Clauses Act, 1897.
- D. That the appellant despite being the senior most employee of district Nowshetra who due to this sole reason was placed on serial No.4 in the Seniority List, 2021 has very ruthlessly been ignored and has been deprived of his promotion in violation of Seniority Rules.
- E. That the appellant is entitled to promotion not only on the basis of his seniority but on the basis of his high qualification alongwith Typing skills as well
- F. That the appellant otherwise is entitled to promotion on the basis of 33% class -IV quota not only because of his seniority but his eligibility, relevant and higher qualification as well.
- G. That although promotion could not be claimed as a matter of right yet incase of an out turn promotions in favour of junior employees by means of ignoring senior employees the same order would not only be illegal but would also be based on malafide which orders are liable to be set-aside/cancelled.

- H. That the appellant has been performing his duties from the date of his inception till date to the entire satisfaction of his superiors and high ups without any complaint from any quarter.
- I. That according to the dictum laid down by the August Court of Supreme Court of Pakistan a civil servant holding requisite qualification and who otherwise fulfills the required conditions would have his right to be considered for promotion.
- J. That the non promotion/consideration of the appellant for promotion by respondent No.1-2 is unlawful, against rules of propriety, fair play and principles of Natural Justice, hence, liable to be set-aside/quashed.
- K. That the appellant has not been treated equally neither in accordance to law nor justly rather has been discriminated against, hence, the instant appeal.
- L. That any other ground may be adduced with permission of this Hon'ble Tribunal at the time of arguments.

**It is, therefore, prayed that on acceptance of instant Appeal this Hon'ble Tribunal may be pleased to**

- i. Setaside the impugned Promotion Orders dated 07.06.2021 and Dismissal Order dated 23.08.2021 passed by respondent No. 1- respectively.**
- ii. Direct respondents No.1 and 2 to promote the appellant to the post of Junior Clerk (BPS-II) under 33% quota of Class-IV employees.**
- iii. Any other relief which specifically not prayed for and which this Hon'ble Court deems fit and proper may kindly be granted.**

Munz  
Appellant

through

Zia-Ur-Rahman Tajik

Zia-Ur-Rahman Tajik  
LLB, LLM, Sharia Law  
Advocate

Supreme Court of Pakistan.

&

Malik Ihtisham-Ul-Haq Khan  
Advocate High Court(s)

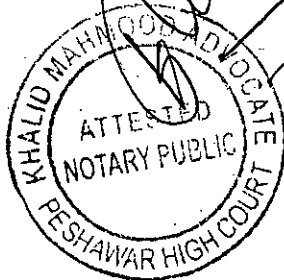
Ahmad Mujtaba Khan  
Advocate

Mian Hamza Hadi  
Advocate

Salman Khan  
Advocate

AFFIDAVIT:

I, Muhammad Muneeb s/o Khanzada (Chowkidar/Class-IV) Government Girls Primary School No.02, Saleh Khana Tehsil Pabbi, District Nowshera, do hereby affirm and declare on oath that the contents of the instant Appeal are true and correct to the best of my knowledge and belief.



Munz  
Deponent



**BEFORE THE HON'BLE SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No. \_\_\_\_-P/2021

Muhammad Muneeb

Versus

Director E&amp;SE KPK etc.

**Addresses of Parties****APPELLANT:**

Muhammad Muneeb s/o Khanzada  
(Chowkidar/Class-IV)  
Government Girls Primary School No.02,  
Saleh Khana Tehsil Pabbi,  
District Nowshehra.

**RESPONDENTS:**

1. Director,  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa,  
Peshawar.
2. District Education Officer/D.E.O (Female),  
District Nowshehra.
3. District Monitoring Officer,  
Nowshehra.

4. Deputy Commissioner.  
District Newshehra.
5. Muhammad Farooq s/o Saraf Khan (Junior Clerk)  
Government Girls Higher Secondary School Rashakai.
6. Tufail (Junior Clerk)  
Government Girls Higher Secondary School  
ASC Newshehra.
7. Noor Muhammad s/o Afzal Khan (Junior Clerk)  
Government Girls Higher Secondary School Azakhel Payan  
District Newshehra.
8. Gul Muhammad s/o Taj Muhammad (Junior Clerk)  
Government Girls Higher Secondary School Dagai Qadeem.
9. Fazl-e-Ahad s/o Said Mehmoode (Junior Clerk),  
Government Girls Higher Secondary School Dhery Kathikhel,  
District Newshehra.
10. Sarfaraz Khan s/o Fazl-e-Malik (Junior Clerk)  
Government Girls Higher Secondary School,  
Newshehra Canntt.
11. Hayatullah s/o Wali Ullah (Junior Clerk)  
Government Girls Higher Secondary School Dagbesud,  
District Newshehra.
12. Munjamil Khan s/o Ghayas-Ud-Din (Junior Clerk)  
Government Girls Higher Secondary School Nodh  
District Newshehra.
13. Rattan Kumar s/o Kishan Lal (Junior Clerk)  
Government Girls Higher Secondary School Marhati Banda

District Newshehra.

14. Muhammad Ismail s/o Lawar Khan (Junior Clerk)  
Government Girls Higher Secondary School Kotli Kalan,  
District Newshehra.

15. Luqman Gul s/o Arman Gul (Junior Clerk)  
Government Girls Higher Secondary School Mandori,  
District Newshehra.

16. Muhammad Arif s/o Mohy-Ud-Din (Junior Clerk)  
Government Girls Higher Secondary School,  
Jalozai Newshehra.

*Muhammad*  
Appellant

through

*Zia-Ur-Rahman*  
Zia-Ur-Rahman Tajik

LLB, LLM, Sharia Law

Advocate

Supreme Court of Pakistan.

&

*Malik Ihtisham-Ul-Haq Khan*  
Malik Ihtisham-Ul-Haq Khan  
Advocate High Court(s)

Ahmad Mujtaba Khan

Advocate

*Mian Hamza*

Mian Hamza

Advocate

Salman Khan  
Advocate

Alama Iqbal Open University  
Islamabad

11



Annex - A

Serial No | 273368

Certified that *Mr/Ms* MOHAMMAD MUNIB

*Son/Daughter of* KHAN ZADA

*Registration No* 15NNA00522 *Roll No* BD456032

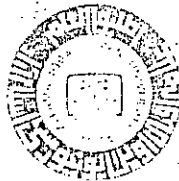
*Semester* Autumn 2016 *having met all the requirements under*  
*the semester system is this day awarded the degree of*

Bachelor of Arts  
Group - General

*[Signature]*  
Sub Divisional Education Officer  
(Female) Pabai Nowshera

*He/She has secured* 59 *% marks*  
*and has been placed in* C *grade*

*[Signature]*  
CONTROLLER OF EXAMINATIONS



VICE-CHANCELLOR

Result declared on: August 28, 2017

Date of issue: January 12, 2018

*[Signature]*  
Sub Divisional Education Officer  
(Female) Pabai Nowshera

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT. PROVISIONAL CERTIFICATE ISSUED SEPARATELY

Attested  
*[Signature]*

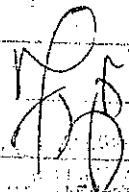
Annex-A/1 حراج رپورٹ

میں مہتمم محمد منیب ولد خان زاوہ  
 نے گورنمنٹ گریڈ پرائمری سکول بچہ صالح خان  
 میں چوکیدار کی حیثیت سے حکم E.D.O. (CA) نوشہرہ  
 24-6-1999 کو اپنے بھدے کا چارج سنبھال لیا۔

حراج گریڈ  
 M

حراج وینڈہ  
 نیلوفر بیگم

date 24-06-1999

  
 Sub-Divisional Education Officer  
 (Punjab) Pabli No. 1099

SARHAD TYPE & SHORT HAND COLLEGE



CAVALRY ROAD, NOWSHERA CANTT.  
(DISTT. PESHAWAR.)  
Head Office : NOWSHERA.

Annex-  
A/2

**CERTIFICATE**

This is to Certify that Mr. Muhammad Anis S/O Shari Khatun  
Resident of Village S.O. Salehkhana, Via Abbi, Peshawar (Peshawar)  
has undergone Typing/Short Hand Training course in this institute  
under my Supervision from 16-5-1987 to 17-5-1987

He took keen interest in his studies during the training period.

At the time of termination of the course his speed of  
Typing/Short Hand found was 40 (Forty) words  
per minute respectively.

Wishing him good luck & success in his future life.

PRINCIPAL DIRECTOR

Sub Divisional Education Officer  
(Female) Pabbi Nowshera

*(Signature)*  
(Mr. Dad Khattak)

Date.....16-5-1987...

"This certificate is issued without alteration or censure"



2146

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Annex - A / 3

# SARHAD TYPE & SHORT HAND COLLEGE



CAVALRY ROAD, NOWSHERA CANTT.  
(DISTT. PESHAWAR)

Head Office: NOWSHERA

## CERTIFICATE

This is to Certify that Mr. MOHD MUNEEB s/o KHAN ZADA  
Resident of Vill & P.O Saleh Khana Teh & Distt: Nowshera.  
has undergone Typing/Short Hand Training course in this institute  
under my Supervision from 29.3.1987 to 28.9.1987

He took keen interest in his studies during the training period.

At the time of termination of the course his speed of Typing/  
Short Hand found was 40/80 words  
per minute respectively.

Wishing him good luck & success in his future life.

Date.....30.9.1987.....  
Sub Divisional Education Officer  
(Female) Pabli Nowshera

*(Signature)*  
Principal Director  
Nowshera Chatsadda

"This Certificate is issued without alteration or erasure"

Annex A/4

14/A

TO WHOM IT MAY CONCERN


It is to certify that Mr. Muhammad Munib S/O Khan Zada Resident of Mohallah Guner Khel Village Saleh Khana Tehsil Pabbi, District Nowshera KPK. Chowkidar is working in GGPS 2 Saleh Khana. This is regular and punctual and having Good moral Charecter. Attending the duty Honestly and Sincerely.

Principal

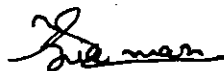
G.G.P.S 2

Saleh Khana NSR.

Date: / /

  
HEAD MISTRESS  
Govt. Girls P.S. School  
Saleh Khana NSR

Attested




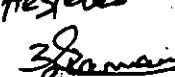


CERTIFICATE

Annex-B

Certified that Mr: Muhammad Muneeb S/O Khan Zada working in Education Department as a Chowkidar Post at GGPS No 2 Salehkhana Tehsil Pabbi District Nowshera the Seniority list of Class IV issued by DEO(F) NSR Dated on 21/01/2021. The official Concerned S.No 04 in Seniority list Checked and Found Correct Vide Personal No 00367258 Nic No 17201-2131933-7.

  
Sub Divisional Education Officer  
(Female) Pabbi Nowshera

Attested  


16

Annex-C



OFFICE OF THE  
DISTRICT EDUCATION OFFICER (FEMALE)  
NOWSHERA  
(Phone/Fax No. 0923-9220105)



NOTIFICATION

Consequent upon recommendations of the Departmental Promotion Committee (DPC), the following class-IV Govt. employees of E/S Education female District Nowshera are hereby promoted to the post of Junior Clerk BPS-11 (Rs12570-880-38970) 12570/-PM plus usual allowances as admissible under the rules on regular basis, under 33% quota on passing SSC with seniority, under the existing policy of the provincial Government on the terms and conditions given below and are further posted at the schools noted against vacant posts in the interest of public service with immediate effect.

S.#	S.# in Seniority List	Name & Designation with Qualification & School	Fathers Name	Post with Place of Posting	Remarks
01	07	Muhammad Farooq SSC Chowkidar GGPS, #2 Khesbgi Payan	Surai Khm	J/Clerk GGHS Rashakai	AVP
02	52	Tufail SSC Sweeper DEO(F) NSR	Parvez	J/Clerk GGHS,ASC Centre	AVP
03	59	Noor Rahman SSC NQ GGHS, Azakhel Bala	Afzal Khan	J/Clerk GGHS, Azakhel Payan NSR	AVP
04	61	Gul Muhammad SSC NQ GGHS, Dagi Qadim	Taj Muhammad	J/Clerk GGHS, Dagi Qadim	AVP
05	68	Fazl-e- Ahad SSC Chowkidar GGPS, #2 Pir Sabag	Said Mahmood	J/Clerk GGHS, Dheri Kati Khel	AVP
06	71	Sarfraz Khan SSC NQ GGHS, Nowshera Kalan	Fazli Malik	J/Clerk GGHS, Nowshera Cantt.	AVP
07	72	Hayat Ullah SSC NQ GGPS,#2 Mohib Banda	Wali Ullah	J/Clerk GGHS, Dag Besud	AVP
08	84	Munjmil Khan SSC Chowkidar GGPS, Patawo Payan	Ghayasuddin	J/Clerk GGHS, Nodeh NSR	AVP
09	86	Rathan Kumar SSC Chowkidar GGPS, Mandar Risalpure	Kishan Lal	J/Clerk GGHS, Marhati Banda	AVP

*[Handwritten signature]*

Attested  
*[Handwritten signature]*

10	SS	Muhammad Ismail SSC NQ GGHSS, Lau Labba	Lauwar Khan	J/Clerk GGHSS, Katli Kalan	AVP
11	104	Luqman Gul FA NQ GGHSS, Mandori	Farran Gul	J/Clerk GGHSS, Mandori	AVP
12	115	Muhammad Arif SSC Chowkidar GGCMS, Wazir Chri	Mohi ud Din	J/Clerk GGHSS, Jalozai NSR	AVP

TERMS AND CONDITIONS:-

1. They shall be on probation for a period of one year extendable for one another year.
2. They shall be governed by such rules and regulations as may be issued from time to time by the Government.
3. They will receive typing training on computer within 03 months otherwise their promotion will be withdrawn.
4. They can be reverted at any time, in case their performance is found unsatisfactory during probation period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
5. Their inter se-seniority on lower post will be remain intact.
6. Charge report should be submitted to all concerned.
7. No FA/DA etc. shall be allowed to the appointee for joining their duties.

(DURE SHAWAR)  
DISTRICT EDUCATION OFFICER  
(FEMALE) NOWSHERA


Endst. No. 2295-2307 /DEO (F)Nsr/Estt:/Class-IV Promotion Dated 07/06/2021

Copy forwarded for information and necessary action to the:-

1. Director E/S Education Khyber Pakhtunkhwa Peshawar
2. Deputy Commissioner Nowshera
3. Senior District Accounts Officer Nowshera
4. District Monitoring Officer Nowshera
5. Principal/Head Mistress Concerned
6. SDEO (Female) Concerned.
7. ADEO Establishment Secondary & Primary Local Office
8. Superintendent Local office.
9. Mr. Zahid Zaman Awan District President Class-IV Association NSR.
10. Officials Concerned.
11. EMIS Local Office
12. Master File.



DISTRICT EDUCATION OFFICER  
(FEMALE) NOWSHERA

Attested  


Annex - D

اپنی:

جناب عالی

سائل حسب ذیل عرض کرتا ہے۔

- (۱) یہ کہ سائل محکمہ تعلیم میں بطور چوکیدار (کلاس فور) مورچہ 24-06-1999 بھرتی ہوا تھا۔ (Appointment لیٹرف ہے)
- (۲) یہ کہ سائل بھرتی ہونے کے بعد اپنی ڈیوٹی نہایت خوش اسلوبی سے تاحال سرانجام دے رہا ہے۔
- (۳) یہ کہ مورچہ 07-06-2021 کو ڈسٹرکٹ ایجوکیشن آفیسر نی میل ایک نوٹیفکیشن نمبر 2295-2307 جاری ہو چکی ہے جس میں ڈسٹرکٹ نوٹشہرہ کے کلاس فور ملازمین کی پروموشن ہوئی ہے۔
- (۴) یہ کہ سائل بھی کلاس فور ملازم ہے اور سیناریٹی لسٹ جو کہ DEO نی میل کے دفتر سے جاری ہو چکا ہے جس کے مطابق سائل سیناریٹی لسٹ میں چار نمبر پر درج ہے۔
- (۵) یہ کہ سائل گریجویٹ ہے اور اس کے ساتھ ٹائپنگ اور شارٹ ہینڈ کا تجربہ رکھتا ہے۔
- (۶) یہ کہ صوبائی گورنمنٹ کی پالیسی کے مطابق 33% کوٹ کے حساب سے بھی سائل کا حق بنتا ہے کہ اس کو بھی جونیئر کلرک (BPS-11) میں پروموشن کیا جائے۔
- (۷) یہ کہ کہ (Female) Sub Divisional Education Officer (Female) ضلع نوشہرہ کے جاری شدہ شیفٹ کے مطابق سائل سیناریٹی لسٹ جو کہ مورچہ 21-01-2021 جاری ہو چکی ہے جس کے مطابق سائل سیناریٹی لسٹ میں سیریل نمبر چار پر درست طور پر درج ہے جو کہ پرسنل نمبر 00367258 شناختی کارڈ نمبر 7-1933-213-17201 ہے، کے مطابق سائل کا حق بنتا ہے کہ سائل کو بمطابق ریکارڈ جونیئر کلرک (BPS-11) میں پروموشن لیا جانا قرین انصاف ہے۔
- (۸) یہ کہ سائل کو نظر انداز کرنا غلط و خلاف قانون و خلاف دستاویز ہے بدین وجہ استدعا ہے کہ سائل کو حسب قانون و بمطابق ریکارڈ مندرجہ بالا پوسٹ پر پروموشن ہونا کا حکم صادر فرمایا جائے۔

Attested  
[Signature]

لہذا استدعا ہے کہ منظوری اپیل ہذا مسائل کو بمطابق قانون و بمطابق ریکارڈ اسینیاری لسٹ جو نیئر کلرک (BPS-11) میں پروموٹ کرنے کا حکم صادر فرمایا جائے۔

المرقوم: 28-06-2021

العرض

محمد نیب ولد خانزادہ سکند محله گڑھ خیل، ڈاکخانہ صالح خانہ، تحصیل پی سی، ضلع نوشہرہ۔  
چوکیدار۔ گورنمنٹ گرلز پرائمری سکول نمبر 2 صالح خانہ، تحصیل پی سی، ضلع نوشہرہ۔

شناختی کارڈ نمبر 7-17201-2131933

موبائل نمبر 5-835455-0335

بیان حلف:

حلفاً بیان کرتا ہوں کہ جملہ مراتب اپیل ہذا تاحد میرے علم و یقین درست اور صحیح ہے۔ در کوئی امر مخفی نہ رکھا ہے۔

العب

محمد نیب ولد خانزادہ سکند محله گڑھ خیل، ڈاکخانہ صالح خانہ، تحصیل پی سی، ضلع نوشہرہ۔



Attested  
Zameer



**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR.**

No 1177 /F.No.391 /A-20/C-IV/Nowshera/Vol-II

Dated Peshawar the 23-8-2021

Phone: 091-9225344

Email: ddadm.e@gmail.com

20

To

Annex - E

District Education Officer  
(Female) Nowshera

Subject:

APPLICATION FOR PROMOTION OF CLASS-IV TO JUNIOR CLERK

Memo:

I am directed to refer to your Letter No. 4568 dated 29/07/2021 on the subject cited above and to ask you that appeal in r/o Mr. Muhammad Muneb S/No. 206 has been rejected.

*[Signature]*  
Deputy Director (F&A)  
Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst; No. 1177-78

Copy forwarded to the: -

1. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Master File.

1  
Deputy Director (F&A)  
Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Attested  
*[Signature]*

**BEFORE THE HON'BLE SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No. \_\_\_\_-P/2021

Muhammad Muneeb

Versus

Director EGSE KPK etc.

**RESPONDENTS:**

1. Director,  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa,  
Peshawar.
2. District Education Officer/D.E.O (Female),  
District Nowshera.
3. District Monitoring Officer,  
Nowshera.
4. Deputy Commissioner,  
District Nowshera.
5. Muhammad Farooq s/o Saraf Khan (Junior Clerk)  
Government Girls Higher Secondary School Rashakai.
6. Tufail (Junior Clerk)  
Government Girls Higher Secondary School  
ASC Nowshera.
7. Noor Muhammad s/o Afzal Khan (Junior Clerk)  
Government Girls Higher Secondary School Azakhel Payan  
District Nowshera.

8. Gul Muhammad s/o Taj Muhammad (Junior Clerk)  
Government Girls Higher Secondary School Dagai Qadeem.
9. Fazl-e-Ahad s/o Said Mehmoode (Junior Clerk),  
Government Girls Higher Secondary School Dhery Kathikhel,  
District Nowshehra.
10. Sarfaraz Khan s/o Fazl-e-Malik (Junior Clerk)  
Government Girls Higher Secondary School,  
Nowshehra Canntt.
11. Hayatullah s/o Wali Ullah (Junior Clerk)  
Government Girls Higher Secondary School Dagbesud,  
District Nowshehra.
12. Munjamil Khan s/o Ghayas-Ud-Din (Junior Clerk)  
Government Girls Higher Secondary School Nodh  
District Nowshehra.
13. Rattan Kumar s/o Kishan Lal (Junior Clerk)  
Government Girls Higher Secondary School Marhati Banda  
District Nowshehra.
14. Muhammad Ismail s/o Lawar Khan (Junior Clerk)  
Government Girls Higher Secondary School Kotli Kalan,  
District Nowshehra.
15. Luqman Gul s/o Arman Gul (Junior Clerk)  
Government Girls Higher Secondary School Mandori,  
District Nowshehra.
16. Muhammad Arif s/o Mohy-Ud-Din (Junior Clerk)  
Government Girls Higher Secondary School,  
Jalozai Nowshehra.

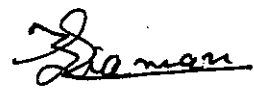


NOTICE

Please take notice that the undersigned has filed the subject Appeal against the impugned Promotion Orders dated 07.06.2021 and Order dated 23.08.2021.

  
Appellant


through

  
Zia-Ur-Rahman Tajik  
LLB, LLM, Sharia Law  
Advocate  
Supreme Court of Pakistan.

&

  
Malik Ihtisham-Ul-Haq Khan  
Advocate High Court(s)

Ahmad Mujtaba Khan  
Advocate

  
Mian Hamza  
Advocate

Salman Khan  
Advocate

# WAKALAT NAMA

IN THE COURT OF Services Tribunal Peshawar

Muhammad Muneeb (Petitioner) (Plaintiff), (Appellant), (Complainant)

VERSUS

Government And Others (Respondent), (Defendant), (Accused)

Case FIR No \_\_\_\_\_ Dated \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ Police Station \_\_\_\_\_

Charge u/s \_\_\_\_\_

I/We, Muhammad Muneeb / So / Khan Zada

The above noted Appellant do hereby appoint and Authorize **Zia-ur-Rehman Tajik Advocate, Supreme Court of Pakistan** to compromise, withdraw or refer to arbitration for me/us as my/our counsel in the above noted matter, I/we also authorized the said Counsel to file appeal, revision, review application for restoration, compromise, withdraw, refer the matter for arbitration. And make any miscellaneous application in the matter or arising out of matter and to withdraw and receive in my/our behalf all sums and amount deposited in my/our account in the above noted matter.

ACCEPTED



**Zia-ur-Rehman Tajik**

L.L.B, L.L.M, Diploma in Sharia Law

Advocate Supreme Court of Pakistan

Office: 26-A, Nasir Mansion

2-Railway Road, Peshawar.

Phone:091-2564272

Cell: 0300-9357932

And Hamza hadi Mirza  
CLIENT

And Malik  
Malik Athisham-ul-Haq-Khan  
Advocate High Court (S)

VAKALATNAMA

NO. 7358/2021

IN THE COURT OF KP Service Tribunal, Peshawar

Mohammad Muneeb

Appellant  
Petitioner  
Plaintiff

VERSUS

Education Dept

Respondent(s)  
Defendants (s)

I/WE Fazole Ahmad (Respondent No 9), Pataun Komor (R-13)

do hereby appoint and constitute the **SYED NOMAN ALI BUKHARI Advocate High Court** for the aforesaid Appellant(s), Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party to commence and prosecute / to appear and defend this action / appeal / petition / reference on my / our behalf and all proceedings that may be taken in respect of any application connected with the same including proceeding in taxation and application for review, to draw and deposit money, to file and take documents, to accept the process of the court, to appoint and instruct council, to represent the aforesaid Appellant, Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party agree(s) ratify all the acts done by the aforesaid.

DATE \_\_\_\_\_ /20

Fazole Ahmad  
(Respondent-13)

Fazole Ahmad  
Respondent No - 9

(CLIENT)

ACCEPTED

Syed Noman Ali Bukhari  
SYED NOMAN ALI BUKHARI  
ADVOCATE HIGH COURT

①

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

Service Appeal No. 7358/2021

Muhammad Muneeb

VS

Education Deptt.:

.....

**REPLY ON BEHALF OF RESPONDENTS NO. 6, 7, 8, 9, 10, 13,  
14 & 15**

**PRELIMINARY OBJECTION:**

1. The appeal is bad for non-joinder of necessary party.
2. The appeal is not maintainable in its present form.
3. The appeal of the appellant is not competent.
4. The appellant has no cause of action, so appeal is not maintainable.
5. The appellant has no locus standi.
6. The appellant concealed the material facts from this Honorable Tribunal.
7. That the appeal is time barred.
8. That the appellant has not come with clean hands.

**RESPECTFULLY SHEWETH:**

The respondents seeks to submit:-

1. Correct. To the extent that the appellant was appointed in the year in 24.06.1999. while replying respondent is much senior to the appellant as appointed in the year 1993, 1994, and 1995 as evident from the appointment order and service book of the replying respondent, so claim of the appellant is baseless. **Copy of appointment order and service book is attached as annexure-A.**
2. Incorrect and misleading. The Final Seniority list was issued on 07.03.2020 wherein replying respondents was mentioned from S.No 1 to 7 and private respondent was available at S.no 10. The said seniority list is not disputed and final. **Copy of seniority list is attached as annexure-B.**
3. Incorrect and misleading. The promotion order of the replying respondent was made in light of Service tribunal Judgment in appeal no 276/2016 followed by the execution petition no:

247/2019. Moreover the replying respondents are much senior to the appellant as appointed in the year 1993, 1994, and 1995 as evident from the appointment order and service book of the replying respondent, so claim of the appellant is baseless. **Copy of documents is attached as annexure-C.**

- 4. Denied for want of knowledge moreover, the appeal of the appellant was rejected for the reason that he is junior most.
- 5. Incorrect. The appellant is not a aggrieved person. Moreover the appellant of the appellant may be dismissed om following grounds amongst others.

**GROUND:**

- A) Incorrect, hence denied. Moreover as explained in the above paras.
- B) Incorrect and misconceived. Moreover, as explained in the above paras. The promotion order of the replying respondent was according to law, rules and as per seniority list which is properly circulated.
- C) Incorrect and misconceived. Moreover, as explained in the above paras.
- D) Incorrect and misconceived. Moreover, as explained in the above paras. the replying respondents are much senior to the appellant as appointed in the year 1993, 1994, and 1995 as evident from the appointment orders and service book of the replying respondent, so claim of the appellant is baseless
- E) Incorrect and misconceived. Moreover, as explained in the above paras.
- F) Incorrect and misconceived. Moreover, as explained in the above paras.
- G) Incorrect and misconceived. Moreover, as explained in the above paras. the replying respondents are much senior to the appellant as appointed in the year 1993, 1994, and 1995 as evident from the appointment orders and service book of the replying respondent, so claim of the appellant is baseless. So, The promotion order of the replying respondent was according to law, rules and as per seniority list which is properly circulated.
- H) Denied for want of knowledge.

- I) Correct. the replying respondents are much senior to the appellant as appointed in the year 1993, 1994, and 1995 as evident from the appointment orders and service book of the replying respondent, so claim of the appellant is baseless. So, the promotion order of the replying respondents were according to law, rules and as per seniority list which is properly circulated.
- J) Incorrect. Moreover, as explained in the above paras.
- K) Incorrect.
- L) The respondents also raise necessary grounds at the time of arguments.

It is, therefore, most humbly prayed that the appeal of the appellant may kindly be dismissed with costs throughout.

**Respondent No. 6, 7, 8, 9, 10, 13, 14 & 15**

Through:

  
**(SYED NOMAN ALI BUKHARI)**  
**ADVOCATE, PESHAWAR.**

**AFFIDAVIT:**

It is affirmed and declared that the contents of reply are true and correct to the best of my knowledge and belief and nothing has been concealed from Hon'able Tribunal.

  
DEPONENT

A 4

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) SSC MANDHOORI NOWSHERA

APPOINTMENT ORDER

Mr. Inqam Gul S/O Farman Gul is hereby appointed as Naib Kasid against the vacant post in BPS-1 (No. 1245-35-1770) Rs. 12,500/- plus usual allowance as admissible under the rules w.e.f. the date of his taking over charge at the office of Headmistress, Govt. Girls Middle School Mandhoori (Nowshera) under the following terms and conditions.

CONDITIONS

1. Charge reports in triplicate should be submitted to all concerned.
2. No TA/DA is allowed being 1st appointment.
3. No joining time is allowed except what is absolutely necessary for transit.
4. The appointment is purely on temporary basis and subject to termination at any time without assigning any reasons or prior notice. In case he wishes to leave the post he will submit his resignation in lieu thereof of 1 month's pay and allowances to Government.
5. He should produce his health and age certificate from the Civil Surgeon/DHO within 7 days of the receipt of this order required under the rule F-10 S-4.
6. In case the candidate fails to take over charge within 10 days from the date of issue of this letter, his appointment has stand cancelled automatically.
7. The verification roll of character and antecedent should be obtained from the candidate concerned on the prescribed form and submit to this office for further verification and record.
8. The candidate should not be handed over charge if his age less than 18 years or above 45 years.
9. He should execute necessary security bond in case he is required to handle Govt. Money or property.
10. The pay scale and service rules would be subject to revision in accordance with orders to be passed by the Govt. of W.P.P. from time to time.

Handmistress  
G.G.H.S. Mandhoori  
District Nowshera

(MRS. ZAIBUN NISA AYUB)  
DISTRICT EDUCATION OFFICER  
(FEMALE) SSC MANDHOORI NOWSHERA.

No. 1851-SV P.No. 5/Glas-IV Apptt: dated 24/4/1995.

Copy for information to the:-

- 1. District Education Officer Nowshera.
- 2. District Education Officer Mandhoori.
- 3. Headmistress, Govt. Girls Middle School Mandhoori (W/P)
- 4. Candidate concerned.

Principal  
G.G.H.S.S. Mandhoori  
Distt. Nowshera

DISTRICT EDUCATION OFFICER  
(FEMALE) SSC MANDHOORI NOWSHERA.

Principal  
G.G.H.S.S. Mandhoori  
Distt. Nowshera

5) حجاج ریزرٹ

یقیناً گل ولہر فریمان گل نے بحوالہ آرڈر نمبر 54-1851 کے مطابق  
محبت نامی قاصد گورنمنٹ گرلز مڈل سکول مندوڑی  
میں اپنے عہدے کا حجاج کو قیل از دو پیرے لیا ہے۔

دستخط حجاج کنڈر پرنسپل

حجاج دیندلا

W/c Fatima Bili

Head Mistress  
G.G.M.S.  
Mandoori (Nowshera)

Principal  
G.G.H.S.S. Mandoori  
Distt. Nowshera



(For use in Police Department only).

6

1. Passed SSC (A) Examination 1982  
from BISE Peshawar under Roll No 18512  
and Marks obtained 432 out of 850  
Placed in Grade "C"

2. Verification Roll No. 87 dated 11/1/87  
Passed Intermediate (Sufficiency) 11  
Examination, 1994 under Roll No 9528  
from BISE Peshawar and Marks obtained  
421 out of 1100 and placed in Grade "E"

Qualification	Date	Qualifications	Date
English		First Arts	
Pashtu		B. L. or B. A.	
Urdu		Pledership examination	
Plan-drawing		Training School Final examination	
Finger print		Other qualifications	
Drill instructing			
Court duties			
Reserve duties			

N.B.—Line to be drawn under the qualification

Principal  
G.G.H.S.S. Mandora  
Distt. Nowshera

7

Entries in this page should be renewed or re-attested at least every five years and the Signature to lines 9 and 10 should be dated.

1. Name *Mrs. Lhman Gil*  
2. Race *Afghan*  
3. Residence *in Village Mandora (Mizoram Pura)  
Tehsil Distt. Nowshera*

4. Father's name and residence *Mr. Farman Gil*

5. Date of birth by Christian era as nearly as can be ascertained *(06-01-1977)  
Sixth January 1977, Seven.*

6. Exact height by measurement *5 feet 6*

7. Personal marks for identification *Scar marks on R. eye nose*

8. Left hand thumb and Finger impression of (non-gazetted) officer

Thumb	
Middle Finger	Ring Finger
Fore Finger	

9. Signature of Government servant *Lhman Gil*

10. Signature and designation of the Head of the Office, or other Attesting Officer  
*(D. G. (F) SEGYI  
NOWSHERA.*

*Principal*  
Principal  
C.G.H.S.S. Mandoori  
Distt. Nowshera

92  
8512  
57  
17  
Country  
9528  
Obtained  
Grade "E"  
217

Date  
Examination

(8)

1	2	3	4	5	6	7	8	9	10
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional pay for officiating	Other emolument falling under the term 'Pay'	Date of appointment	Signature of Government servant	Signature and position of the head of office or other officer in charge of forms 1 to 8	Date of termination of appointment
N/O		B-01	Rs. 1245/-	1245.35	1770			D. S. (P) SEOR, NOVSINRA	
			Rs. 1245/-	1280/-		24/95			
				1280/-		1/95			
Residual Entries in P/S No. T 1245-35-1770									
N/O			Rs. 1245/-	A = 140/-	4 adhoc ac. by F.A.	24/95			
do			Rs. 1420/-			1/95			
do			Rs. 1455/-			1/96			
do			Rs. 1490/-			1/97			
do			Rs. 1525/-			1/98			
do			Rs. 1560/-			1/98			
do			Rs. 1595/-			1/2000			

Principal  
GGS Indraprastha  
Delhi

Signature and position of the head of office or other officer in charge of forms 1 to 8

D. S. (P) SEOR, NOVSINRA

30/95

30/96

30/97

30/98

30/99

30/00

9

Sl. No.	Signature of Government Servant	Signature and position of the head of the office or other appointing officer in pursuance of sub-sections 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
						Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government to which debitable		
4-5	<i>[Signature]</i>	<i>[Signature]</i> D. (F) SEOY NOWSHERA	30/11/95		<i>[Signature]</i> D. (F) SEOY NOWSHERA				Approved as N/C. at 8895 Madan B... 1245-35-1770... official no. 1851-3 of 24-4-95.
12-5	<i>[Signature]</i>	<i>[Signature]</i> D. (F) SEOY NOWSHERA		Revised entries	<i>[Signature]</i>				1245-35-1770
14/95	<i>[Signature]</i>	<i>[Signature]</i> D. (F) SEOY NOWSHERA	30/11/95	Annual Acc	<i>[Signature]</i>				Allowed by Advy. Govt on SSC N. F. A. Service Verified From 24-11-94 to 30-11-94 from the A. & B. & other record of this Office.
12/95	<i>[Signature]</i>	<i>[Signature]</i> D. (F) SEOY NOWSHERA	30/11/95	Annual Acc	<i>[Signature]</i>				
12/96	<i>[Signature]</i>	<i>[Signature]</i> D. (F) SEOY NOWSHERA	30/11/96	Annual Acc	<i>[Signature]</i>				
12/97	<i>[Signature]</i>	<i>[Signature]</i> D. (F) SEOY NOWSHERA	30/11/97	Annual Acc	<i>[Signature]</i>				Services verified from 1-12-95 to 30-11-96 from the A. & B. & other record of this office
12/98	<i>[Signature]</i>	<i>[Signature]</i> D. (F) SEOY NOWSHERA	30/11/98	Annual Acc	<i>[Signature]</i>				
12/99	<i>[Signature]</i>	<i>[Signature]</i> D. (F) SEOY NOWSHERA	30/11/99	Annual Acc	<i>[Signature]</i>				T No 54 dt. 7/8/97. Dm. No. 4034/80 in M. U. of Paying SSC in F. A. & S. 1455/PM.
12/2000	<i>[Signature]</i>	<i>[Signature]</i> D. (F) SEOY NOWSHERA	30/11/2000	Scale Revised	<i>[Signature]</i>				11/11/95 to 7/95. S. 1455/PM.

Principal  
G. S. Madan  
12/11/2000

D. (F) SEOY  
NOWSHERA

(P)

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature of Government servant	9 Signature and designation of the head of the office or other attesting officer in attestation in columns 1 to 8	10 Date of appointment or termination of appointment
LLQMAN (GAD) B.P.S-14 1/R-66HSS (Mandoori)			RS 20460/-	1-18/2020				<p>Principal GHS Mandoori Dist: Nowshera</p>	30-10
<p>REVISED ENTRY IN THE LIGHT OF PROMOTION AS JUNIOR CLERK  <del>—————</del></p>									
<p>Pay on 6-6-2021 in B-04, Rs. 20460/-</p>									
<p>Pay on 7-6-2021 in B-11 = Rs. 20490/- 880/-</p>									
<p>Pre-Mature 7-6-2021. Rs. 21370/-</p>									
<p>Received Principal GHS Mandoori Dist: Nowshera</p>									
<p>Received Principal GHS Mandoori Dist: Nowshera</p>									

TR 92

B. P. Singh  
F. J.  
Rs. 270  
to 30/10

11

8	9	10	11	12	13		14	15
						Leave		
						Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
						Per-iod	Government to which debitable	
Signature of Government servant	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Nature and duration of leave taken		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
<i>A</i>	<i>Principal</i> G.H.S.S. Mandoozi Distt. Nowshera	<i>30/11/2020</i>	<i>Promoted as Jr. clerk</i>	<i>Principal</i> G.H.S.S. Mandoozi Distt. Nowshera			<i>Principal</i>	
<p>TR 92 Dtd 05/7/20x          B. pay &amp; d @ 21370 P.m          of July 20x1 Amount of          Rs 2720/- p.d of state          to 30/6/21</p>					<p>Promoted as Junior clerk          at G.H.S.S Mandoozi vide          District Education officer NSR          Notification endost No.2295-2307/          DEOCNSE Estb/class IV Promotion          dated 07-06-2021 at S.No= 11</p> <p><i>Principal</i>          G.H.S.S. Mandoozi          Distt. Nowshera</p>			
<p><i>DASA</i>  <i>of state 01/7/20x1</i></p>					<p><i>Principal</i>          G.H.S.S. Mandoozi          Distt. Nowshera</p>			

19

Mr. TUFAIL S/O PERVEZ is hereby appointed as a Sweeper post in No-1(221-26-1310) @ Rs:920/-pm plus usual allowances as admissible under the rules w.e.f. the date of his taking over charge at the office of District Education Officer (Female) Primary, Nowshera against vacant post under the following terms and conditions:-

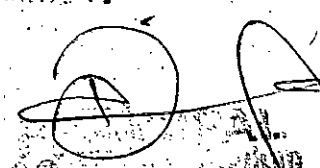
- 1- Change reports in triplicate should be submitted to all concerned.
- 2- No TA/DA is allowed being 1st appointment.
- 3- No joining time is allowed except what is absolutely necessary for transit.
- 4- The appointment is purely on temporary basis and subject to termination at any time without assigning any reasons or prior notice. In case he wishes to leave the post he will submit one month's prior notice in lieu of forfeit one month's pay and allowances to Government.
- 5- He should produce his health and age certificate from the Civil Surgeon/DHO with in 7 days of the receipt of this order as required under the rules.
- 6- In case the candidate fails to take over charge with in 10 days from the date of issue of this letter, his appointment has stand cancelled automatically.
- 7- The verification form of character and antecedents should be obtained from the candidate concerned on the prescribed form and submit to this office for further verification and record.
- 8- The candidate should not be handed over charge if his age is less than 18 years or above 45 years.
- 9- He should execute necessary security bond in case he is required to handle Govt; money or property.
- 10- The pay scale and services rules would be subject to revision in accordance with orders to be issued by the Govt; of NWFP, from time to time.

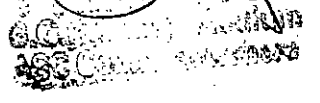
(MISS JAMILA HANIF KHAN)  
DISTRICT EDUCATION OFFICER,  
(FEMALE) PRIMARY, NOWSHERA.

1032-40 Dated: 05/08/91

Copy for information to the:-

- 1- Director, Primary Education, Hayatabad Peshawar.
- 2- District Accounts Officer Nowshera.
- 3- B.O. Local Office.
- 4- Candidate concerned.
- 5- File.

  
DISTRICT EDUCATION OFFICER,  
(FEMALE) PRIMARY, NOWSHERA.



13

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PRIMARY NOWSHERA.

OFFICE ORDER.

APPOINTMENT OF CLASS-IV ON CONTRACT BASIS.

Mr. Fazal Ahad S/O. Haji Saïd Muhammed resident of village Fir Sabak

candidate is hereby appointed as Class-IV (Chowkidar/Waib. Qasid) on Rs:1200/PM Fixed under the rules with effect from the date of his taking over charge at Govt: Girls Primary School Fir Sabak (21) against Chowkidar post according to the AGREEMENT BOND under the following terms and conditions :-

CONDITIONS:-

1. Charge reports should be submitted to all concerned.
2. No TA/DA is allowed being 1st appointment.
3. No joining time is allowed what is absolutely necessary for the transit.
4. The appointment is purely on temporary basis & subject to the termination at any time and without any notice.
5. In case he wishes to leave the Deptt: he should have to submit one month prior notice,
6. He should produced his Health age Certificate from the concerned-Civil surgen/M.O. within 7 days of reporting/ arrival a duty as required under the rules (FR-10) Sr.4.
7. In case the candidate fails to take over charge within 7 days from the date of issue of this order, his appointment will stand automatically CANCELLED.
8. The candidate should not be handed over charge if his age is not between 18-45 years.
9. He will produce photo copies of the relevant documents i.e. National Identity Card, Domicile etc to this office at the time of taking over charge.
10. He will be dealt with under the E&D rules if he violate Govt. rules and regulations.

(MISS: JAMILA AKHTAR MALIK),  
DISTRICT EDUCATION OFFICER  
(FEMALE) PRIMARY NOWSHERA.

Dist: NO. 4804-9 / F. NO. 5 / Apptt: of Class IV Dated NSR THE 17/4 / 1993.

Copy of the above is forwarded for information to the:-  
Director Primary Education WFP, Hayatabad, Peshawar.  
Sub. Divl: Education Officer (Female) Nowshera.  
Head Mistress concerned.  
ADDO (Account's) local office.  
MPA Concerned.  
P/ File. Candidate Concerned.

Il-Aziz

DISTRICT EDUCATION OFFICER  
(FEMALE) PRIMARY NOWSHERA.

*Attest*

S.D.E.O.  
NOWSHERA



14 2

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PRIMARY, NOWSHERA

APPOINTMENT OF CLASS-IV ON CONTRACT BASIS

OFFICE ORDER

Mrs. SALWARAZ KHAN S/O FAZL MALIK resident of village Nowshera Kalan is hereby appointed as a Class-IV (NAIB QASID) on Rs: 1200/- PM Fixed under the rules w.e.f. the date of his taking over charge at Govt; Girls Community Model School (NO:4 Old) against the NAIB QASID POST under the following terms & conditions:-

CONDITIONS:

- 1- Charge reports should be submitted to all concerned.
- 2- No P.F./D.A. is allowed being 1st appointment.
- 3- No joining time is allowed what is absolutely necessary for the transit.
- 4- The appointment is purely on temporary basis & subject to the termination at any time and without any notice.
- 5- In case he wishes to leave the Deptt; He should have to submit One month prior notice.
- 6- He should produce his health & age certificate from the concerned Civil Surgeon, C.O. within 7 days of reporting/arrival on duty as required under the rules (PR-10) Cr. 4.
- 7- In case he fails to take over charge within 7 days from the date of issue this order, his appointment will stand automatically CANCELLED.
- 8- The candidate should not be handed over charge if his age is not between 18-45 years.
- 9- He will produce photo copies of the relevant documents i.e. National Identity Card, Domocile etc; to this office at the time of taking over charge.
- 10- He will be health with under the EAD rules if he violates the Govt; rules & regulations.

(MISS JAMILA AKHTAR MALIK)  
DISTRICT EDUCATION OFFICER,  
(FEMALE) PRIMARY, NOWSHERA.

Endstt; No: 5655-69 No: 72/P&D/ADEO/CMS/Class-IV Aptt/ Dated 16/6 /93

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

- 1- Director Primary Education, NTFP, Hayatabad, Peshawar.
- 2- Project Manager, NEGP, NTFP, Peshawar.
- 3- Sub-Divil; Education Officer (Female) Nowshera.
- 4- Headmistress Concerned.
- 5- ADEO(A) Local Office.
- 6- P/File.

Abdul Aziz/

*[Signature]*  
16/6/93  
DISTRICT EDUCATION OFFICER,  
(FEMALE) PRIMARY, NOWSHERA.

(7) (8)

15

میں نے آرڈر نمبر 69-55 گاڈ کے تحت 6/17/93

کیمپوٹی ماڈل اسکول میں بیڈنگ میں ٹائپ فاصلہ کی قیمت سے خارج ٹیل آرڈر دوپہ لے لیا

حاجہ 2/10/93

سرگودھا ایجوکیشنل افسار

حاجہ 2/10/93

کیمپوٹی ماڈل اسکول

کیمپوٹی ماڈل اسکول میں بیڈنگ

6/17/93

16

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (FEMALE) NOWSHERA.

APPOINTMENT OF CLASS IV ON CONTRACT BASIS.

OFFICE ORDER. / RATHAN KUMAR Sub Div. Edu Officer (F) Nowshera / KISHAN LAL

resident of Sadar Risalpur Nair Barmak Mindar candidate is hereby appointed as Class IV (Chowkidar) ~~with effect~~ on Rs:- 1200/- P.M Fixed under the rules with effect from the date of his taking over charge at Govt: Girl Pry: School Risalpur (Newly Created Post) of Chowkidar Post according to AGREEMENT BOND under the following terms and conditions:-

- CONDITIONS:-
- 1- Charge reports should be submitted to all concerned.
  - 2- No T.A/D.A is allowed being 1st Appointment.
  - 3- No joining time is allowed what is absolutely necessary for the transit.
  - 4- The appointment is purely on Temporary basis & subject to the termination at any time and without any notice.
  - 5- In case he wishes to leave the Dept: he should have to submit one month prior notice.
  - 6- He should produced his Health & age Certificate for the concerned Civil Surgeon with in 7 days of reporting arrival a duty as required under the rules, F.R-10 Sr.4.
  - 7- In case the candidate fails to take over charge with in 7 days from the date of issue of this order, his appointment will stand automatically CANCELLED.
  - 8- The candidate should not be handover charge if his age is not between 18-45 Years.
  - 9- He will produce photo copies of the relevant documents i.e time of taking over charge.
  - 10- He will be death with under the P&D rules if he violated Govt: rules and regulations.

(MISS NASIM SULZAN)  
SUB DIVISIONAL EDUCATION OFFICER (FEMALE) NOWSHERA.

ENDST: No. 6365-69/F.No.5 Appointment of Classiv dated 1-9-1964

Copy of the above is submitted to the :-  
District Education Officer (Female) Primary Nowshera.  
Headmistress G.P.S, Risalpur Distt: Nowshera.  
A.DEO (Accounts) Local Office.  
M.P.A.P.F-11  
F/File.

- 1-
- 2-
- 3-
- 4-
- 5-

Nasim Sulzan  
SUB DIVISIONAL EDUCATION OFFICER (FEMALE) NOWSHERA.  
Sub Div. Edu Officer (F) Nowshera

(JAVED)

been original

Na. Nasim Sulzan  
SUB DIVISIONAL EDUCATION OFFICER (FEMALE) NOWSHERA.

Nasim Sulzan  
SUB DIVISIONAL EDUCATION OFFICER (FEMALE) NOWSHERA.

تہذیب و ثقافت کی ترقی اور ترقی یافتہ معاشرے کی تعمیر

آج مورخہ 19-9-94 کو آرڈر نمبر 69-6365  
 تحت میں نے قبل از دوپہر اپنے عہدے  
 کا چارج سنبھالا اور رات کو سکول  
 (مدرسہ) میں رہا۔

جارج دیندہ جارج کونڈہ  
 Ratan Kumar Fehmida Bagum.

Head Mistress  
 Govt. Girls Primary  
 School M...

Head Mistress  
 Govt. Girls Primary  
 School M...

19

APPOINTMENT.

In Mrs. Roshan Begum Azakhel Khan  
is hereby appointed as a Prob. Teacher (B.O.I No. (Rs. 220-26-4311) Rs. 220/HR plus usual allowances at Govt. Middle / Primary School, Azakhel Bala (Nowshera) in the interest of public service against vacant Post with effect from the date of taking over charge.

NOTE:-

1. The appointment of the above named candidate is hereby made purely temporary basis and liable to termination at any time without assigning any reason or any notice.
2. In case of resignation he/she will have to submit one month's prior notice to the Deptt. or forfeit one month's pay in lieu thereof to the Govt.!
3. He/She is required to produce health and age certificate from the Medical officer concerned.
4. He/She will be governed by such service discipline and conduct or may be prescribed here-after.
5. He/She should not take over charge if any his/her age is less than 16 years or above 45 years.
6. If He/She fail to take over charge of the post within ten days of the receipt of these order the officer of apptt shall stand cancelled.
7. He/She should not be allowed to take over charge if He/She is not bonafide residence of N.W.F.P.
8. Charge report should be submitted to all concerned. No TA/DA etc is allowed.

( MRS. NARGIS BANO )  
SUB-DIVISIONAL EDUCATION OFFICER (P) NOWSHERA.

Endstt: No 46-48-52 / Dated NSU the 2/11/1993  
Copy forwa for information to the

- 1 - District Accountant, Nowshera.
- 2 - District Education Officer (P) Primary Nowshera.
- 3 - A.S.D.E.O. concerned.
- 4 - Headmaster, M/S/GGS Azakhel Bala
- 5 - Accountant, Local Office.
- 6 - Candidate concerned.

2/11/93  
SUB-DIVISIONAL EDUCATION OFFICER (P) NOWSHERA.

Shad Khattak/\*

Principal  
G.H.S.S. Azakhel Payan  
Nowshera

Principal  
G.H.S.S. Azakhel Payan  
Nowshera

تعمیراتی اور سرکاری ڈویژن

امیر ذہنا عمارت کی تعمیر

یہ ہے قبل از دور پھر آرڈر نمبر 1648 کے مطابق  
گورنمنٹ گراؤنڈ میں سول انجینئر مالا سے  
نائب قاضی عارف 3/93 کو جاری ہے

یا

نور رحمان ولد افضل خان

SIC  
Rizwana Zabeen  
MR-10  
SIC

Attested  
Principal  
G.G.H.S.S.  
Azakhel Bala MSR

Handwritten signature

Attested  
Principal  
GGHSS Azakhel Payan  
Nowshera

Principal  
GGHSS Azakhel Payan  
Nowshera

20'

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) SECONDARY NOWSHERA.

APPOINTMENT ORDER.

Mr. Mohd: Ismail S/O Lawar Khan is hereby appointed against N/Qasid post in BPS-I(1245-35-1770) @ Rs:1245/-pm plus usual allowances as admissible under the rules w.e.f the date of his taking over charge at L. Govt: Girls Middle School Taru Jabba against the newly created vacant post under the following terms and conditions:-

CONDITIONS:-

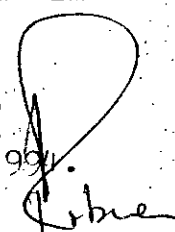
- 1) Charge reports in triplicate should be submitted to all concerned.
- 2) No TA/DA is allowed being 1st appointment.
- 3) No joining time is allowed except what is absolutely necessary for transit.
- 4) The appointment is purely on temporary basis and subject to termination at any time without assigning any reasons or prior notice. In case he wishes to leave the post he will submit one month's prior notice in lieu thereof forfeit one month's pay and allowances to Government.
- 5) He should produce his health and age certificate from the Civil Surgeon/DHO within 7 days of the receipt of this order as required under the rule FR-10 SR-4.
- 6) In case the candidate fails to take over charge within 10 days from the date of issue of this letter his appointment has stand cancelled automatically.
- 7) The verification roll of character and antecedent should be obtained from the candidate concerned on the prescribed form and submit to this office for further verification and record.
- 8) The candidate should not be handed over charge if his age is less than 18 years or above 45 years.
- 9) He should execute necessary security bond in case he is required to handle Govt: money or property.
- 10) The pay scale and services rules would be subject to revision in accordance with orders to be passed by the Govt: of NWFP, from time to time.


(MSM LALA RUKH)  
DISTRICT EDUCATION OFFICER,  
(FEMALE) SECONDARY NOWSHERA.

Post: NO 5156/60 / Dated Nowshera the 27/9 / 1991.

Copy for information to the:-

Director Primary Education NWFP, Hayat Abad Peshawar.  
District Accounts Officer Nowshera.  
ADEO(A) Local Office.  
Candidate concerned.  
P/File.

  
Principal  
G.G.H.S.S.  
Azakhel Bala NSR

  
DISTRICT EDUCATION OFFICER,  
(FEMALE) SECONDARY NOWSHERA.

27-6-94 - 5156 - 3

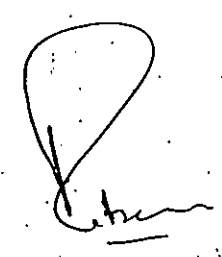
21

یہ ایک آرڈر ہے جس کے تحت گورنمنٹ ٹیچنگ ایسوسی ایشن کے قیام کے لیے ایک کمیٹی مقرر کی گئی ہے۔

عزیز  
حاجہ شہناز

میاں اسماعیل خان  
M. Ismail

پرنسپل



Principal  
G.G.H.S.  
Kathel Bala NSR



29

PHONE NO. 3088

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

**APPOINTMENT.**  
Consequent upon selection/Re-Commandation of the Selection Committee, Mr. Mr. Gul Mohomed S/O Taj Mohomed Chate Ex-Chowk candidate is hereby appointed against post of Chowkdar in BPS: No. 1 of Rs: 920/- PM plus usual allowances as admissible under the rules with effect from the date of his taking over charge at G.H.S Dagi Bonda against the vacant Post.

**TERMS & CONDITION:-**

1. The appointment is purely temporary and liable to termination at any time without assigning any reason or notice.
2. In case of resignation they will have to submit one month prior notice to the Deptt: or forfeit one month pay from the Govt: Servant/.
3. They are required to produce Health and Age Certificate from the Medical authorities concerned before taking over charge. In case they are not Govt: Servant.
4. They are not allowed to take over charge if their age is less than 18 Years and above than 30 Years.
5. All original Educational Character and domicile certificate must be verified by the Head of Institution concerned before handing over charge.
5. If they fail to take over charge of the post with in seven days from the issue of this order the appointment will be automatically considered as cancelled.
7. Charge report should be submitted to all concerned.
8. No. TA/DA etc is allowed.

(MOHAMMAD ZAMAN KHAN)  
DISTRICT EDUCATION OFFICER,  
(MALE) SECY: NOWSHERA.

Endst; No. 514-44/E No: A-5/c/IV App: dated NSR: 10/31/193  
Copy forwarded for information and n/a to the:

- 1:- District Accounts Officer Nowshera.
- 2:- Head MASTER G.H.S Dagi Bonda
- 3:- Candidate Committee
- 4:- A/P

*[Signature]*  
DISTRICT EDUCATION OFFICER,  
(MALE) SECY: NOWSHERA.

*[Signature]*  
**HEADMISTRESS**  
**G.G.H.S Dagi Bonda**  
**Nowshera**

23

1995 ✓

5-

FINAL SENIORITY LIST OF SSC PASSED CLASS IV OF E/S EDUCATION (FEMALE) NOWSHERA FOR PROMOTION OF 33% QUOTA TO JUNIOR CLERK CORRECTED UP TO 29-02-2020

S. No.	Name of School/ Office	Name & Designation	Father's Name	Date of Birth	Date of 1st Apptt:	Qualification	Date of Passing SSC	Date of Regular Apptt: for Promotion	Remarks
1	DEO (F) Nowshera	Tufail (Sweeper)	Pervez	06-11-1974	05-08-1991	SSC	1995		
2	GGMS Baghan Pura	Muhammad Siraj Khan (N/Q)	Muhammad Afzal	03-01-1972	03-06-1992	F.A	Annual 1992		1992
3	GGHSS Aza Khel Bala	Noor Rahman (N/Q)	Afzal Khan	01-12-1969	03-01-1993	SSC	Annual 1990		
4	GGPS, No. 1 Muhib Banda	Hayat Ullah (N/Q)	Wali Ullah	12-03-1970	20-06-1993	SSC	Supply 1989		
5	GGPS Risalpur Mandar	Rattan Kumar (Chowkidar)	Kishan Lal	03-11-1974	01-09-1994	SSC	Supply 1991		
6	GGHSS Taru Jabba	Muhammad Ismail (N/Q)	Lawar Khan	11-01-19963	27-09-1994	SSC	1980		
7	GGHSS Mandoori	Luqman Gul (N/Q)	Farman Gul	06-01-1977	24-04-1995	SSC	Annual 1992		(F.A)
8	GGHS Jalozai	Hammad Ahmad (Chowkidar)	Fazli Mahmood	02-01-1973	02-06-1996	SSC	Annual 1991		
9	GGHS No. 02 Nowshera Kalan	Nowshad Khan (Beheshji)	Anwar Khan	13-02-1969	24-10-1996	SSC	Annual 1989		
10	GGPS No. 02 Saleh Khana	Muhammad Muneeb (Chowkidar)	Khan Zada	01-06-1970	24-06-1997	F.A	1989		
11	GGPS Islam Abad	Javed Khan (Chowkidar)	Hameed Ul Ghafoor	20-04-1972	01-07-1997	F.A	1991		0322-20/8246
12	GGHSS D.I. Khel	Farooq Shah (Chowkidar)	Niaz Ali Shah	10-05-1965	08-11-1997	SSC	Annual 1982		
13	GGHSS D.I. Khel	Shabana Begum (L/ Attnd:)	Hikmat Shah	04-05-1978	08-11-1997	SSC	Annual 1996		
14	DEO (F) Nowshera	Muhammad Tariq (Chowkidar)	Farman Badshah	03-12-1973	26-11-1997	SSC	Annual 1991		
15	GGHSS Manki Sharif	Naveed Khan (N/Q)	Ali Rehman	05-04-1981	28-10-1998	F.A	1999		
16	GGHSS No. 01 Nowshera Kalan	Asia Perveen (Lab: Attend:)	Asmat Ullah	20-05-1974	01-01-1999	SSC	Supply 1993		
17	GGHSS No. 01 Nowshera Kalan	Mehmooda (Lab: Attend:)	Munir Khan	13-04-1977	01-01-1999	SSC	1997		
18	GGHSS No. 01 Nowshera Kalan	Nargis (Lab: Attend:)	Misal Khan	10-01-1996	02-02-1999	SSC	2014		
19	GGPS No.02 Spin Kahi Kalan	Noor Daraz Khan (Chowkidar)	Sawab Khan	01-07-1971	16-02-1999	SSC	Supply 1990		
20	GGHS ASC Center	Ramzan Bibi (Lab: Attend:)	Lal Zada	01-08-1968	19-02-1999	SSC	Annual 1984		
21	GGHSS No. 01 Nowshera Kalan	Roobi (Lab: Attend:)	Atta Ur Rehman	22-08-1978	22-02-1999	SSC	Annual 1997		
22	GGHS Hisartang	Gul Wahid (N/Q)	Nadir Khan	30-01-1976	20-03-1999	SSC	Supply 1991		
23	GGHS Kana Khel	Mustamir Khan (N/Q)	Mir Alam Khan	10-06-1977	05-06-1999	SSC	Supply 1996		
24	GGPS Armour Colony	Hayat Gul (Chowkidar)	Samar Gul	06-03-1980	04-07-1999	SSC	Supply 1997		
25	GGPS No. 01 Pabbi	Rizwan Ullah (Chowkidar)	Karim Jan	11-03-1984	14-04-2002	F.A	2002		
26	GGHSS D.I. Khel	Muhammad Israr (N/Q)	Shakir Zada	05-01-1981	26-10-2005	SSC	Annual 2002		
27	GGHS Marhatti Banda	Asad Ullah (N/Q)	Nazeef Ullah	14-05-1983	13-02-2006	SSC	Annual 2000		

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District Education Officer (F) / (S) Nowshera

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28	GGHS Marhatti Banda	Rifayat Ullah (Sweeper)	Aman Ullah	26-09-1985	13-02-2006	F.A	Supply 2002		
29	GGHSS Misri Banda	Rahman Zaib (N/Q)	Mira Khan	20-07-1985	24-02-2006	F.A	Supply 2003		
30	GGCMS ASC Colony	Amjad Ali (N/Q)	Janat Gul	26-06-1977	04-10-2006	SSC	Annual 1999		
31	DEO (F) Nowshera	Akhtar Hussain (N/Q)	Azam Khan	14-03-1982	05-10-2006	SSC	Annual 1998		
32	GGMS Mian Essa	Abid Mehmood (N/Q)	Faqir Muhammad	06-05-1980	22-03-2007	SSC	Annual 1999		
33	GGHSS Muhib Banda	Azra Begum (Lab: Attend:)	Zulfiqar Ali	16-10-1982	22-05-2007	B.A	Annual 2002		
34	GGMS Habib Ullah Korona	Kifayat Ullah	Lal Mast	14-01-1967	25-08-2007	SSC	Annual 1985		
35	GGPS Khat Killi	Shakir Ullah (Chowkidar)	Muhammad Qasim	15-04-1986	23-01-2008	B.A	Supply 2004		
36	GGHS Spin Khak	Shabana Khatak (Sweeper)	Shadad Khan	07-04-1984	22-07-2009	SSC	Annual 2003		
37	GGHSS Rashakai	Dilraj Begum (Lab: Attend:)	Johar Gul	15-02-1986	31-07-2009	SSC	Supply 2005		
38	GGMS Khattak Building	Muhammad Siraj (N/Q)	Muhammad Taj	01-02-1979	05-08-2009	SSC	2015		
39	GGMS Risalpur	Hamid Ali (Sweeper)	Sher Wali	20-03-1986	11-08-2009	SSC	Supply 2006		
40	GGPS Hoti Khel	Riaz Ullah (Chowkidar)	Liaqat Ullah	22-03-1987	22-08-2009	B.A	Supply 2006		
41	GGMS Islam Abad	Muhammad Kamran (N/Q)	Hidayat Hussain	10-04-1989	25-08-2009	SSC	Annual 2004		
42	GGPS LC Aman Garh	Zulfiqar Ali Shah (Chowkidar)	Maqbool Shah	24-02-1981	05-09-2009	M.A	Annual 1999		
43	GGHS Hisartang	Shakoor Khan (N/Q)	Khan Badshah	02-10-1983	07-09-2009	SSC	Annual 2001		
44	GGHS Khesghi Payan	Zartab Khan (N/Q)	Fazal-e-Rab	12-04-1981	19-09-2009	SSC	Supply 1997		
45	GGCMS No. 04 Pir Pai	Adil Zaman (Chowkidar)	Muhammad Zaman	07-10-1980	01-10-2009	SSC	Supply 1997		
46	GGPS ASC Center	Noor-Ul Amin (Chowkidar)	Firdous Khan	04-05-1966	07-10-2009	SSC	Annual 1982		
47	GGHS Dag Behsud	Noor Ul Abrar (Chowkidar)	Said Ul Abrar	03-02-1977	13-02-2010	SSC	Supply 1995		
48	GGHS Dag Behsud	Nabi Amin (Lab: Attend:)	Abdul Sattar	06-04-1991	13-02-2010	F.A	2009		
49	GGHS Inzari	Shamim Ara (Lab: Attend:)	Mir Azam	01-04-1972	03-03-2010	B.A	2002		
50	GGHSS Nizampur	Shazia Sanobar	Sanobar Khan	02-11-1976	03-03-2010	B.A	Annual 1995		
51	GGMS Adam Zai	Jan Bahadar (Sweeper)	Sher Bahadar	01-02-1977	04-03-2010	SSC	Annual 1995		
52	GGHS Jabbi Payan	Zainab Shamaz (Sweeper)	Shamaz Gul	22-03-1984	31-05-2010	SSC	2004		
53	GGPS Hessian Khel Misri Banda	Mughalib Shah (Chowkidar)	Anwar Shah	15-10-1979	25-06-2010		1998		
54	GGPS Khattak Korona Shaidu	Abdul Jalil (Chowkidar)	Muhammad Naeem	01-01-1980	28-06-2010	SSC	Annual 1999		
55	GGHSS Badrashi	Nafees	Zubaid Ullah	01-06-1977	09-10-2010	SSC	1996		
56	GGMS Garu Nizampur	Khiyal Bahadar (N/Q)	Khan Bahadar	05-01-1978	02-03-2011	F.A	2017		
57	GGHSS No. 01 Nowshera Cantt:	Mubarak Ali (Beheshii)	Allah Bakhsh	02-09-1967	03-01-2012	SSC	Annual 1986		
58	GGHSS Akora Khattak	Saima Naz	Wali Ur Rahman	15-12-1989	03-01-2012	B.A	Annual 2009		
59	GGHS No. 02 Nowshera Kalan	Ayaz Khan	Janas Khan	02-02-1979	05-01-2012	SSC	1996		
60	GGHS Spin Khak	Luqman Ali (Chowkidar)	Niaz Wali	02-03-1987	18-01-2012	SSC	Annual 2004		
61	GGMS Gul Din Korona	Yar Muhammad (N/Q)	Noor Muhammad	02-03-1983	23-01-2012	SSC	Supply 2005		
62	GGHS Jabba Tar	Nasir Zaman (Chowkidar)	Mukhtiar Zaman	01-01-1991	10-05-2012	SSC	Annual 2013		

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District Education  
Officer (F)  
(S) Nowshera

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63	GGPS Darvesh Abad Jabba Tar	Muhammad Idrees (Chowkidar)	Darvesh Khan	12-12-1977	01-06-2012	SSC	Annual 1995		
64	GGPS Dargai	Izhar Ali (Chowkidar)	Akbar Ali	14-05-1978	02-07-2012	SSC	Annual 1997		
65	GGHSS Misri Banda	Sabeer Ullah (Chowkidar)	Unab Gul	12-03-1988	06-08-2012	SSC			
66	GGHSS Misri Banda	Sana Ullah (Lab: Attend.)	Wilayat Khan	15-03-1988	06-08-2012	SSC			
67	GGHSS No. 02 Pabbi	Syeda Uzme Zahoor (Lab: Attend.)	Zahoor Ul Islam	02-02-1977	11-08-2012	B.A	Annual 1992	✓	
68	GGHSS No. 02 Pabbi	Safdar Ali (Chowkidar)	Showkat Ali	01-04-1988	11-08-2012	B.A	Annual 2005		
69	GGMS Mughalki	Jamal Ahmad (Sweeper)	Mukamil Shah		13-08-2012	F.A			
70	GGMS Shaidu	Muhammad Rafiq (Chowkidar)	Wali Khan	25-04-1977	29-11-2012	SSC	Supply 1994		
71	GGHS Khawrai	Maqsood Shehzad (Sweeper)	Akhtar Alam	03-03-1993	11-06-2013	SSC	Annual 2009		
72	DEO (F) Nowshera	Shehla Afsar (Daftar)	Afsar Khan	29-03-1984	11-08-2014	B.A	Annual 2002		
73	GGHSS Mandoori	Irshad Muhammad (Chowkidar)	Ilyas Khan	05-02-1978	11-08-2014	B.Ed	2005		
74	GGHSS Mandoori	Nasheeda (Lab: Attend.)	Farman Gul	07-03-1985	11-08-2014	SSC	Supply 2002		
75	GGHSS Akbar Pura	Faizan Shah (Chowkidar)	Zahir Shah	27-06-1990	11-08-2014	SSC	2010		
76	GGHSS Mandoori	Owais (Chowkidar)	Irfan Gul	03-04-1995	11-08-2014	B.A	2011		
77	GGHS Tarkha	Taj Wali Khan (Chowkidar)	Raj Wali Khan	06-02-1981	12-08-2014	SSC	Annual 1997		
78	GGHS Gari Momin	Asif (N/Q)	Saif Ur Rahman	01-05-1985	12-08-2014	F.A	Annual 2002		
79	GGHSS Nizampur	Muhammad Faheem (Sweeper)	Gul Taj Muhammad	01-04-1993	17-11-2014	SSC	2009		
80	GGPS Aman Kot	Rashid Ullah (Chowkidar)	Arif Ullah	01-01-1992	13-04-2015	B.A	Annual 2010		
81	GGHSS No. 02 Pabbi	Ashraf Khan (Sweeper)	Sherin Khan	15-02-1979	02-07-2015	F.A	1998		
82	GGHSS No. 02 Pabbi	Muhammad Idrees (Chowkidar)	Muhammad Younas	11-03-1987	02-07-2015	F.A	2015		
83	GGJICA Khesgl Payan	Muhammad Alam (Chowkidar)	Abdul Qadeem	14-04-1983	07-07-2015	SSC	Supply 2001		
84	GGMS Kandar	Rafiq Khan (N/Q)	Ghazan Khan	01-01-1980	05-08-2015	SSC	Supply 1996		
85	GGPS Duran Abad	Sajid Ali (Chowkidar)	Jehan Gul	04-04-1978	28-08-2015	B.A	1996		
86	GGMS Tor Dher	Mujahid Khan (N/Q)	Aslam Khan	11-02-1986	05-09-2015	F.A	Annual 2002		
87	GGPS Siavi Nowshera	Maqsood Ahmad (Chowkidar)	Azam Khan	22-04-1984	17-09-2015	M.A	2005		
88	GGHS Sadat Abad	Ali Muhammad (Lab: Attend.)	Danish Khan	06-06-1978	19-09-2015	SSC	Supply 1995		
89	GGHSS Muhib Banda	Mehtab Anwar	Khurshid Anwar	01-04-1992	16-03-2016	SSC	2008		
90	GGHSS Muhib Banda	Imran Khan (N/Q)	Ikhtiar Ali	01-04-1997	16-03-2016	SSC	2015		
91	GGHSS Manki Sharif	Waleed Khan (Lab: Attend.)	Sher Zaman Khan	10-06-1976	24-03-2016	F.A	1992		
92	GGHSS Badrashi	Ateeq Ur Rahman (Lab: Attend.)	Izal Khan	15-04-1977	01-04-2016	M.A	Annual 1994		
93	GGHSS Badrashi	Ateeq Ur Rahman	Motabar Khan	13-03-1996	01-12-2016	SSC	Annual 2002		
94	SDEO (F) Pabbi	Saif Ullah Khan (N/Q)	Saeed Ahmad	07-03-1990	24-01-2017	F.A	Supply 2006		
95	GGHS Kurvi	Shah Room (Lab: Attend.)	Faqir Muhammad	03-03-1979	01-02-2017	SSC	Supply 2000		
96	GGHS Shala Khel	Humaira Iqbal (Lab: Attend.)	Iqbal Hussain	17-07-1974	16-03-2017	M.A	Annual 1991		
97	GGPS Godam Koroona	Muhammad Faheem (Chowkidar)	Taj Muhammad	15-05-1983	16-03-2017	SSC	Supply 1999		

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Office of the  
Deputy Commissioner  
Nowshera

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98	GGHSS Mandoori	Ismail Khan (Chowkidar)	Safi Ullah	05-09-1988	16-03-2017	SSC	Annual 2008		
99	GGHSS Misri Banda	Naheed Khan (N/Q)	Utham Khan	15-09-1983	21-03-2017	SSC			
100	GGHS Jabbi Payan	Muhammad Sajid (Lab: Attend:)	Abdul Raziq	01-02-1990	21-03-2017	B.A	Annual 2005		
101	GGPS Banda Shiekh	Kamran Khan (Chowkidar)	Faqir Khan	16-02-1990	21-03-2017	F.A	2006		
102	GGMS ASC Colony	Muhammad Waqas (N/Q)	Sangeen Khan	01-01-1991	21-03-2017	SSC	Annual 2008		
103	GGHSS Aza Khel Bala	Umair Hassan	Said Umar Khan	11-02-1992	21-03-2017	SSC	2010		
104	GGMS PAF Risalpur	Asfandyar Ali	Sher Wali Khan	13-02-1993	21-03-2017	F.A	Annual 2010		
105	GGHSS Aza Khel Bala	Khashan Ali Shah (N/Q)	Adil Shah	07-01-1995	21-03-2017	SSC	2012		
106	SDEO (F) Jehangira	Sabir Ali (Chowkidar)	Khaishta Gul	16-11-1984	21-03-2017	SSC	2017		
107	GGHSS Aza Khel Payan	Latif Khan (N/Q)	Fazal Muhammad	03-04-1979	22-03-2017	M.Sc	1998		
108	GGHS Gari Momin	Fuzail (Chowkidar)	Sajjad Hussain	20-03-1991	22-03-2017	SSC	2007		
109	GGHSS D.I. Khel	Saba Jalal (Lab: Attend:)	Jalal Shah	05-04-1992	22-03-2017	SSC	Annual 2008		
110	GGHSS Nizampur	Javed Khan (Lab: Attend:)	Shahadat Ullah	16-03-1993	22-03-2017	B.Sc	Annual 2009		
111	GGHSS Deri Katti Khel	Shehzad Ikram (Chowkidar)	Azmat Ullah Khan	03-03-1994	22-03-2017	SSC	Annual 2012		
112	GGHS Gari Momin	Zahid (Lab: Attend:)	Adam Khan	20-04-1996	22-03-2017	F.A	Annual 2014		
113	GGPS Pashtoon Gari	Muhammad Uzair (Chowkidar)	Abdul Hashim	08-08-1996	22-03-2017	D. Com	Annual 2013		
114	GGMS Mian Essa	Irum Saleem (Sweeper)	Muhammad Saleem	10-04-1981	24-03-2017	B.A	Annual 1997		
115	GGHS Marhatti Banda	Jamhoor Ullah (Lab: Attend:)	Nazeef Ullah	03-10-1979	27-03-2017	SSC	Annual 1995		
116	GGHSS Muhib Banda	Faryal Bahesht (Lab: Attend:)	Shamshad	04-04-1988	27-03-2017	B.A	Supply 2004		
117	GGPS Aba Khel	Yasin Ullah (Chowkidar)	Raj Wali Khan	15-11-1989	27-03-2017	B.A	2006		
118	GGPS Sheikhan	Aziz Ur Rahman (Chowkidar)	Zari Dad Khan	09-03-1997	27-03-2017	SSC	Supply 2012		
119	GGPS Sadat Abad	Muhammad Riaz (Chowkidar)	Muhammad Ali	10-04-1982	29-03-2017	SSC	Annual 1998		
120	GGHSS ZKKS Nowshera	Saima Gul (Lab: Attend:)	Mastan Shah	30-06-1985	25-11-2017	M.A	2000		
121	GGHSS Nowshera Kalan	Sarfaraz Khan (N/Q)	Fazle Malik	07-11-1972	17-06-1993	SSC	1997		

*Arsalan*  
Arsalan Ahmad J/Clerk

*Imdad*  
Imdad Ullah Assistant

Saleem Khattak Suptt:

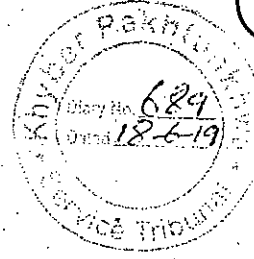
Sumbal Rikhar ADEO (Primary Estab:)

Dy, DEO (F) Nowshera

*Kutta*  
*07-03-2017*  
District Education  
Officer (F)  
(S) Nowshera

BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR.

Execution Petition No. 2177 /2019  
In Service Appeal 276/2016



Mr. Luqman Gul, Naib Qasid,  
Govt: High School, Manduri,  
Nowshera.



(PETITIONER)

VERSUS

1. The Secretary Education (E&SE) KPK, Peshawar.
2. The Director Education (E&SE) KPK, Peshawar.
3. The District Education (E&SE) KPK, Peshawar. Nowshera (F)
4. The Secretary, Finance Department, KPK, Peshawar.


(RESPONDENTS)

**EXECUTION PETITION FOR DIRECTING  
THE RESPONDENTS TO IMPLEMENT  
THE JUDGMENT DATED 27.10.2017 OF  
THIS HONORABLE TRIBUNAL IN  
LETTER AND SPIRIT.**

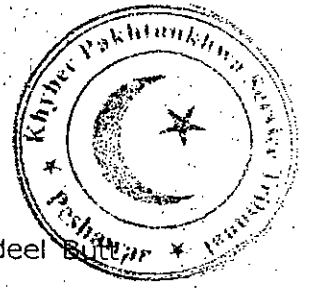
**RESPECTFULLY SHEWETH:**

1. That the appellant filed an appeal bearing No.276/2016 for promotion under 33% quota to the post of Junior Clerk.
2. That the said appeal was finally heard by the Honorable Tribunal on 27.10.2017 and the Honorable Tribunal was kind enough to accept the appeal and issued direction to the respondent that they should calculate the quota of promotes in the accordance with law and consider the appellant for promotion. (Copy of judgment is attached as Annexure-A).
3. That in-action and not fulfilling formal requirements by the department after passing the judgment of this august Tribunal, is totally illegal amount to disobedience and Contempt of Court.

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EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

E.P No. 247/2019  
Lugman Gul vs Govt



08.06.2021

Petitioner in person and Mr. Muhammad Adeel Butt  
Addl. AG for the respondents present.


Petitioner states that he has been promoted to the post of Junior Clerk alongwith others on 07.06.2021 with immediate effect and does not want to pursue execution proceedings further.

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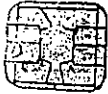
In view of the above, instant Execution Petition is filed. File be consigned to the record room.

  
Chairman

Date of Presentation of Application 08/06/21  
Number of Words 800  
Copying Fee 10.00  
Urgent 4.00  
Total 14.00  
Name of Copyist ---  
Date of Completion of Copy 08/06/21  
Date of Delivery of Copy 08/06/21

Certified to be true copy  
  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

Name  
Luqman Gul



Family Name  
Luqman Gul

Gender Country of Birth  
M Pakistan

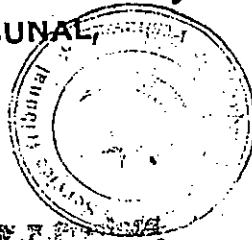
Identific. No. Date of Birth  
172032230609-5 06.01.1977

Date of Issue Date of Expiry  
07.03.2017 07.03.2027



Holder's Signature

ICE TRIBUNAL



16

Service Tribunal  
256  
22-03-2016

Manduri, Nowshera.

APPELLANT

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VERSUS

1. The Secretary Education (E&SE) KPK, Peshawar.
2. The Director Education (E&SE) Peshawar.
3. The District Education Officer, (Female), (E&SE), Nowshera.
4. The Secretary, Finance Department, KPK, Peshawar.

RESPONDENTS

APPEAL UNDER SECTION-4 OF THE KPK SERVICE TRIBUNAL ACT 1974 FOR DIRECTION THE RESPONDENT TO CONSIDER THE APPELLANT FOR PROMOTION TO THE POST OF JUNIOR CLERK UNDER 33% FIXED QUOTA BY THE GOVERNMENT AND AGAINST NOT TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

THAT ON ACCEPTANCE OF THIS APPEAL, THE RESPONDENTS MAY BE DIRECTED TO CONSIDER THE APPELLANT FOR PROMOTION TO THE POST OF JUNIOR CLERK UNDER 33% QUOTA FIXED BY THE GOVERNMENT FROM HIS DUE DATE/AVAILABILITY OF FUND WITH ALL CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

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RESPECTFULLY SHEWETH:

That the appellant joined the respondent department on 24.4.1995. The appellant more than 20 years service with

ATTESTED

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Khuzdar  
Service Tribunal,  
Peshawar





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2017

Counsel for the appellant and Mr. Kabeerullah, Assistant Director of the Advocate General alongwith Hameedullah, Assistant Director of the respondents present.

2. Both the learned counsel for the parties agreed on the point that if this appeal is disposed of in the terms that the department shall calculate the quota of promotees in accordance with the prevalent rules at different stages and then the department shall consider only those appellants and others who are eligible and fit in accordance with the calculation of the department.
3. In view of the above, the respondents are directed that they should calculate the quota of promotees in accordance with the prevalent rules at different stages and then they should consider all those who are eligible and fit for promotion at different stages.
4. The appeal is disposed of in the above terms. Parties are left to bear their own costs. File be consigned to the record room.

*Announced* s/d/ Niaz Muhammad Khan, Chairman  
27.10.2017

s/d/ Ahmad Hassan, Member

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Khyber Pakhtunkhwa Service Tribunal, Peshawar

Date of Presentation of Application: 14-12-17

Number of Pages: 800

Copying Fee: 2/-

Urgent: 8

Total: 8

Name of Copy: [Signature]

Date of Copy: 14-12-17

Date of Delivery of Copy: 14-12-17