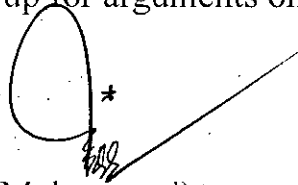


03.11.2022

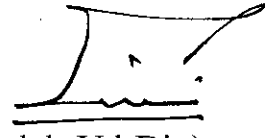
Mr. Muhammad Ayub, Advocate, junior of learned counsel for the appellant present. Mr. Muhammad Hayat Ullah, Litigation Officer alongwith Mr. Muhammad Riaz Khan Painsakhel, Assistant Advocate General for the respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the honourable Peshawar High Court, Peshawar. Adjourned.

To come up for arguments on 29.12.2022 before the D.B.



(Mian Muhammad)
Member (E)



(Salah-Ud-Din)
Member (J)

29/12/22

Due to winter vacation, the case adjourned to 22/3/23 for the same.



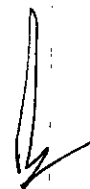
Reader

22.03.2023

Counsel for appellant present.

Mr. Fazal Shah Mohmand, Additional Advocate General for respondents present.

Learned Member Judicial (Mrs. Rozina Rehman) is on leave, therefore, case is adjourned to 07.06.2023 for arguments before D.B. Parcha Peshi given to the parties.



(Muhammad Akbar Khan)
Member (E)

SCANNED
KPST
Peshawar

26th May, 2022

Counsel for the appellant present. Mr. Asif Masood, Deputy District Attorney alongwith Mr. Shahid Anwar, ADEO (Litigation) for respondents present.

Learned counsel for the appellant for deletion of name of respondent No.2 from the penal of respondents. Learned DDA has no objection to the request of the learned counsel for the appellant. Name of respondent No.4 is deleted from the penal of respondents and entry be made in the heading as well as memo of appeal and relevant register with red ink. Learned counsel for the appellant seeks time for arguments. Granted but as a last chance. To come up for arguments on 11.08.2022 before D.B.



(Fareeha Paul)
Member(E)

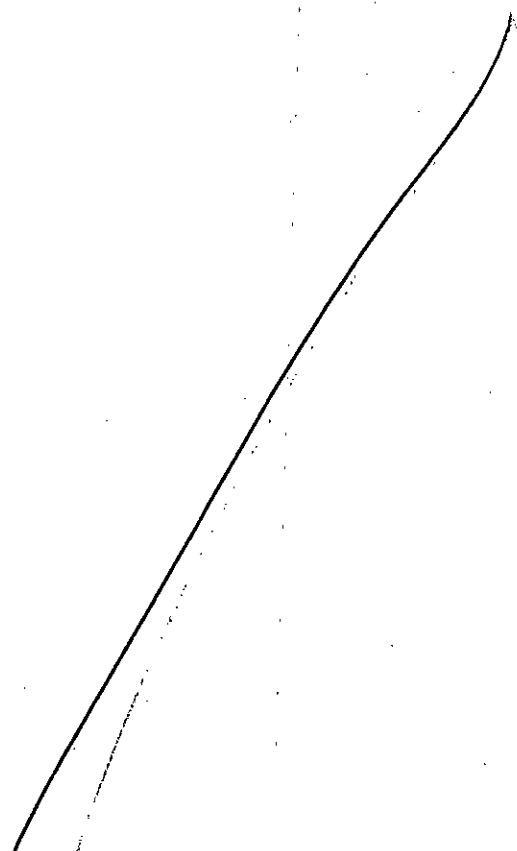


(Kalim Arshad Khan)
Chairman

11-8-2022

Proper DB not available the case
is adjourned to 3-11-2022


Reader



12.07.2021

Learned Addl, A.G be reminded about the omission and for submission of reply/comments within extended time of 10 days.


Chairman

Stipulated period passed reply not submitted.

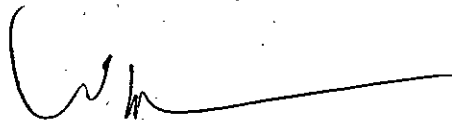
20.10.2021

Counsel for appellant present.



Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Reply on behalf of respondents is still awaited. Request for adjournment was made on behalf of learned A.A.G; granted with direction to furnish the same within 10 days in office positively. To come up for arguments on 31.01.2022 before D.B.



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



(Rozina Rehman)
Member (J)

31.01.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG alongwith Mr. Shahid Anwar ADEO for respondents present and submitted reply/comments which are placed on file. To come up for rejoinder if any, and arguments before the D.B on 26.05.2022.



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

15.06.2021

Appellant present in person. Preliminary arguments heard.

Points raised need consideration. The appeal is admitted to regular hearing, subject to all just and legal objections. 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, the office shall submit the file with a report of non-compliance. File to come up for arguments on 20.10.2021 before the D.B.

Appellant Deposited
Security Process Fee
27/6/21

The appellant has also submitted an application for interim relief. Notice of application be also issued to the respondents.


Chairman

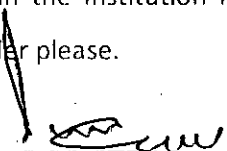



P

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 12884 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27/10/2020	<p>The appeal of Mr. Bakhtiar Ali resubmitted today by Mr. Noor Muhammad Khattak 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> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>07/12/2020</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	07.12.2020	<p>Junior counsel for appellant present.</p> <p>Lawyers are on general strike, therefore, case is adjourned to 25.02.2021 for preliminary hearing, before S.B.</p> <p style="text-align: right;"> (Rozina Rehman) Member (J)</p>
	25.02.2021	<p>The learned Member Judicial Mr. Muhammad Jamal Khan is under transfer, therefore, the case is adjourned. To come up for the same before S.B on 15.06.2021.</p> <p style="text-align: right;"> Reader</p>


SCANNED
KPST
Peshawar

The appeal of Mr. Bakhtiar Ali C.T GMS Tangy Pyan Khadagzai Dir Lower received today i.e. on 20.08.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

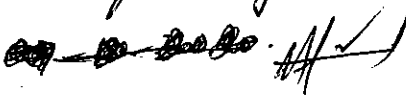
- 1- Annexure-B is incomplete and illegible which may be completed and replaced by legible/better one.
- 2- Annexures-G of the appeal is illegible which may be replaced by legible/better one.

No. 2571 /S.T,

Dt. 2/09 /2020


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Noor Muhammad Khattak Adv. Pesh.

Note :- All the objection i.e Annex-B, and Annex-G
is replaced by better copies. Hence re-submitted.


BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 12884 /2020

BAKHTIAR ALI

VS

EDUCATION DEPTT:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1	Memo of appeal	1- 3.
2	Merit list	A	4- 6.
3	Tehsil Wise appointment order	B	7.
4	Departmental appeal	C	8.
5	Letter	D	9.
6	Letter dated 10.12.1997	E	10.
7	Letter dated 13.11.1997	F	11.
8	Appointment order	G	12.
9	Adjustment order	H	13.
10	Departmental appeal	I	14.
11	Vakalat nama	15.

APPELLANT

THROUGH:


NOOR MOHAMMAD KHATTAK
ADVOCATE

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. _____/2019

Mr. Bakhtiar Aii, C.T (BPS-15),
GMS Tangy Payan Khadagzai, District Dir Lower **Appellant**

VERSUS

- 1- The Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Director, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 4- The District Education Officer, District Dir lower.

..... **RESPONDENTS**

**APPEAL UNDER SECTION- 4 OF THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT, 1974 FOR FIXATION OF PAY IN
BPS-12 AND SENIORITY w.e.f. 17-10-1997 I.E. FROM THE
DATE OF INITIAL APPOINTMENT OF APPELLANT'S
COLLEAGUES TO THE POST OF PST (BPS-12) AND AGAINST
NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF
THE APPELLANT WITHIN THE STATUTORY PERIOD OF
NINETY DAYS**

PRAYER:

That on acceptance of this appeal the appellant may kindly be allowed/granted pay fixation and seniority w.e.f. 17-10-1997 with all back benefits. Any other remedy which this august Service Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts giving rise to the present appeal are as under:

- 1- That the respondents advertised primary schools teachers posts in various district including district dir on 23 march 1997. That appellant being resident of tehsil adenzai district dir and eligible in all respect applied to the same post.
- 2- That after test and interview the appellant got 53 marks and secured 31 position in primary school teachers merit list of district dir. Copy of merit list is attached as annexure.....**A.**
- 3- That it is worth mentioning, that separate lists were prepared for district wise appointment and tehsil wise appointment according to prevailing rules of that time. That appellant had secured 53 marks and was entitle for appointment on post reserved for tehsil wise appointment. However respondents malafidely denied

appointment to appellant and appointed low merit candidates vide order dated 17/10/1997. Copy of tehsil wise appointment order is attached as annexure.....**B.**

- 4- That appellant feeling aggrieved from action and inaction of the respondents filed departmental appeal before respondents no.3. That thereafter respondent no. 3 remit the application of appellant along with other record to respondent no.4 vide letter dated 05/12/1997 and asked him to submit report within three days positively. Copy of departmental appeal and letter is attached as annexure**C & D.**
- 5- That it is worth mentioning that respondent no.4 in response to letter dated 05/12/1997 submitted revised merit list to respondent no.3 vide letter dated 10/12/1997 and stated there that appellant was left from appointment due to over sight. Copy of letter dated 10/12/1997 is attached as annexure..... **E.**
- 6- That there after respondent no.3 directed respondent no.4 vide letter dated 23/12/1997 to dispose of departmental appeal of appellant strictly in accordance with prescribe rules and on merit. Copy of letter dated 13/11/1997 is attached as annexure.....**F.**
- 7- That in follow of to the above mentioned direction respondent no.4 issued appointment order of appellant vide order dated 24/01/1998 and placed his services for further posting at the disposal of SDEO timergara. Copy of appointment order is attached as annexure.....**G.**
- 8- That later on appellant was adjusted against vacant post of PTC/PST at GPS barimkai subdivision timergara vide order dated 22/03/1999 W.e.f 1/4/1999. Copy of adjustment order is attached as annexure.....**H.**
- 9- That it is pertinent to mention here that appellant was granted seniority and other benefits from the date of adjustment i.e 1/4/1999 and not from the date when his other colleagues were appointed pursuant to the same advertisement.
- 10- That feeling aggrieved from the above action of the respondents, the appellant filed departmental appeal before appellate authority, but the same has not been responded within statutory period. Hence he preferred the instant appeal on following grounds inter alia. Copy of departmental appeal is attached as annexure.....**I.**

GROUND:

- A- That the action and inaction of respondents by not allowing pay fixation and seniority to the appellant w.e.f. 17/10/1997 is against the law, facts, norms of natural justice and materials on the record.

- B- That appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the respondents acted in arbitrary and mala fide manner by not allowing pay fixation and seniority to the appellant w.e.f. 17-10-1997 and as such the inaction of the respondents is violative of law and rules.
- D- That the inaction of the respondents is discriminatory and against the norms of natural justice, therefore not tenable in the eye of law.
- E- That under Article 38 (e) of the Constitution of Pakistan, 1973 state is bound to reduce disparity in the income and earning of the individuals including persons in the various services of Pakistan, therefore in light of the above mentioned Article the appellant is fully entitle for the grant of pay fixation and seniority w.e.f. the date of initial appointment.
- F- That the appellant despite meritorious position was not appointed due to malafide on the part of respondents in order to adjust their blue eyes chap and this fact is evident from record. Hence appellant is entitle to pay fixation and seniority from the date i.e 17/10/1997 when his other colleagues were appointed pursuant to the same advertisement.
- G- That in light of Rule 2.3 of the West Pakistan, Pension Rules, 1963 and section 8 of civil servant act, 1973 the appellant is fully entitle for the grant of pay fixation and seniority from the date of initial appointment and not from the date of adjustment.
- H- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 20.12.2019

APPELLANT



BAKHTIAR ALI

THROUGH:



NOOR MOHAMMAD KHATTAK



SHAHZULLAH YOUSAFZAI
ADVOCATES

Better copy page (4)

S. No.	Name of Candidate	Fathers Name	Address	D/o birth			
1.	Waris Khan	Ghulam Habib	Tarnab	-	-	-	-
2.	Asfandyar Rehman	Jamal Badi	-	-	-	-	-
3.	Sher Hadi	Hayat Muhammad	-	-	-	-	-
4.	Shafiq ur Rehman	Muhammad Awal Khan	-	-	-	-	-
5.	Ghulam Habib	Shafiq ur Rehman	-	-	-	-	-
6.	Jamal Badi	Ghulam Habib	-	-	-	-	-
7.	Hayat Muhammad	Jamal Badi	-	-	-	-	-
8.	Muhammad Awal Khan	Hayat Muhammad	-	-	-	-	-
9.	Shafiq ur Rehman	Muhammad Awal Khan	-	-	-	-	-
10.	Ghulam Habib	Muhammad Awal Khan	-	-	-	-	-
11.	Jamal Badi	Shafiq ur Rehman	-	-	-	-	-
12.	Hayat Muhammad	Ghulam Habib	-	-	-	-	-
13.	Muhammad Awal Khan	Jamal Badi	-	-	-	-	-
14.	Shafiq ur Rehman	Hayat Muhammad	-	-	-	-	-
15.	Ghulam Habib	Muhammad Awal Khan	-	-	-	-	-
16.	Jamal Badi	Shafiq ur Rehman	-	-	-	-	-
17.	Hayat Muhammad	Ghulam Habib	-	-	-	-	-
18.	Muhammad Awal Khan	Jamal Badi	-	-	-	-	-
19.	Shafiq ur Rehman	Hayat Muhammad	-	-	-	-	-
20.	Ghulam Habib	Muhammad	-	-	-	-	-

ATTESTED



21.	Jamal Badi	Awal Khan Shafiq ur Rehman	-	-	-	-	-
22.	Hayat Muhammad	Ghulam Habib	-	-	-	-	-
23.	Muhammad Awal Khan	Jamal Badi	-	-	-	-	-
24.	Shafiq ur Rehman	Hayat Muhammad	-	-	-	-	-
25.	Ghulam Habib	Muhammad Awal Khan	-	-	-	-	-
26.	Jamal Badi	Hayat Muhammad	-	-	-	-	-
27.	Hayat Muhammad	Muhammad Awal Khan	-	-	-	-	-
28.	Muhammad Awal Khan	Shafiq ur Rehman	-	-	-	-	-
29.	Shafiq ur Rehman	Ghulam Habib	-	-	-	-	-
30.	Ghulam Habib	Jamal Badi	-	-	-	-	-
31.	Bakhtiar Ali	Mukhtar Muhammad	-	-	-	-	-
32.	Hayat Muhammad	Hayat Muhammad	-	-	-	-	-
33.	Muhammad Awal Khan	Muhammad Awal Khan	-	-	-	-	-
34.	Hayat Muhammad	Shafiq ur Rehman	-	-	-	-	-
35.	Muhammad Awal Khan	Ghulam Habib	-	-	-	-	-
36.	Shafiq ur Rehman	Jamal Badi	-	-	-	-	-
37.	Ghulam Habib	Hayat Muhammad	-	-	-	-	-
38.	Jamal Badi	Muhammad Awal Khan	-	-	-	-	-

ATTESTED



PF-78
 دفتر وائزہ امتحان

A-10

REVISED MERIT LIST OF PROMOTED J.C. CANDIDATES PF-78 DIR G. SERVIC. P. III DISTRICT OFFICE
 زمرہ ک (م) پرمیٹڈ جی. سی. وی. پی. III ڈسٹرکٹ آفس

S.No.	Name of Candidate	Father's Name	Residence	D/O BIRTH	ACADEMIC SCORE				Total Marks
					Maths	P.A	Eng	Urdu	
1.	Wazir Khan	Abdul Hamid	Sillywala	25.02.75	20	7	15	-	42
2.	Ashfaqur Rehman	Farooq Khan	Hydrabad	15.12.73	20	5	10	-	35
3.	Abdul Khan	Abdul Khan Khan	Khanpura	9.02.71	20	7	10	-	37
4.	Khan Muhammad	Yaqub Khan	Chakdara	14.02.73	20	7	10	-	37
5.	Muhammad Bilal Khan	Habibullah Khan	Khanpura	9.01.71	20	7	10	-	37
6.	Muhammad Hayat Khan	Muhammad Shoaib	Tarnan	8.04.75	20	7	10	-	37
7.	Khalifa Rehman	Imdadur Rehman	Zahir Bad	15.11.75	20	5	10	-	35
8.	Khan Muhammad	Umat Khan	Fika Bala	1.05.74	20	5	10	-	35
9.	Abdul Yousaf	Muhammad Yousaf	Wazirabad	11.05.71	20	10	-	-	30
10.	Shah Hadi	Amir Wahid	Kotigraha	4.04.74	20	7	-	-	27
11.	Farooqur Rashid	Mianstullah	Khanpura	1.01.75	20	7	-	-	27
12.	Ashfaqur Rehman	Ashfaqur Rehman	Qucha	10.04.75	20	7	-	-	27
13.	Mabizul Ghafoor	Amjad Hussain	Sillywala	20.12.71	20	7	-	-	27
14.	Mian Muhammad	Ahraf	Sillywala	16.01.73	20	7	-	-	27
15.	Muhammad Zada	Bad Khan Zada	Musa Chagat	10.04.75	20	7	-	-	27
16.	Muhammad Nisar Khan	Abdul Hakeem	Khanpura	14.04.74	20	7	-	-	27
17.	Hakimullah	Farooq Khan	Wazirabad	5.01.74	20	7	-	-	27
18.	Ali Nisab	Zafarullah Khan	Tarnan	20.04.75	20	7	-	-	27
19.	Jamal Hadi	Ghulam Latif	Kotigraha	18.02.74	20	9	-	-	29
20.	Ghulam Habib	Muhammad Hadrat	Brangula	21.02.66	20	5	-	-	25
21.	Reyat Muhammad	Bad Khan Muhammad	Chat Bad	10.05.74	20	5	-	-	25
22.	Hafizullah	Ahmed Khan	Dagla	1.10.73	20	5	-	-	25
23.	Muhammad Zeib	Gul Jani Khan	Hakim	20.03.72	20	5	-	-	25
24.	Muhammad Azeem Khan	Muhammad Gul	Kotigraha	25.09.72	20	5	-	-	25
25.	Azhar Hussain	Muhammad Hussain	Wazirabad	1.01.70	20	7	10	-	37
26.	Fazal Nisar	Muhammad Nisar	Chakdara	22.06.69	20	7	10	-	37
27.	Muhammad Irshad	Wali Muhammad	Hakim	4.03.71	20	7	10	-	37
28.	Azhar Ali	Gul Muhammad	Badva	12.02.73	20	7	10	-	37
29.	Taj Muhammad	Amir Khan	Qucha	1.07.73	20	7	10	-	37
29.	Hadrat Hussain	Wali Wazir	Ranpur	6.02.74	20	7	-	10	37
30.	Muhammad Nadeem	Chauhan Zaher	Badva	12.04.75	20	7	10	-	37
31.	Dakhtiar Ali	Mukhtar Muhammad	Hayat Khan	1.09.74	20	-	-	5	25
32.	Hafiz Muhammad	Muhammad Amin	Kotigraha	2.04.78	-	-	-	5	25
33.	Azhar Khan	Amir Abdul Wahid	Khanpura	15.03.78	20	-	-	-	20
34.	Azhar Bahasa	Azhar Iqbal	Chakdara	10.01.75	20	-	-	-	20
35.	Muhammad Ikram	Muhammad Hadrat	Kotigraha	6.01.70	20	5	10	-	35
36.	Muhammad Ilyas	Muhammad Ilyas	Badva	9.10.66	20	5	10	14	49
37.	Dawood Shah	Fazal Bad Shah	Badva	3.04.73	20	5	7	-	32
38.	Hafizur Rehman	Fazal Rehman	Badva	3.10.60	20	5	7	-	32
39.	Balim Khan	Amir Nisar Khan	Qucha	7.04.71	20	5	7	-	32

(Continued page 2)

ATTESTED

[Signature]

ATTESTED

(Continued Page No. 10)

40.	Said Hassan	Hussain Hassan	Katrina	11.67	35	7	3	10
41.	Fazal Khan	Fazal Khan	Chakara	21.04.74	35	7	3	10
42.	Shah Hussain	Wali Hussain	Ouch	4.03.76	35	7	3	10
43.	Katullah	Katullah	Chakara	35	7	3	10	10
44.	Hussain Hassan	Hussain Hassan	Bahar	25.05.77	35	7	3	10
45.	Aziz Bahar	Inayat Khan	Hambatan	3.02.77	35	7	3	10
46.	Ashraf Ahmad	Jahan Bahar	Ouch	1.02.77	35	7	3	10
47.	Ahmed Hassan	Rahmatullah	Chakara	15.04.75	35	7	3	10
48.	Baqir Hussain	Gulzar Khan	Tangal	3.12.72	35	7	3	10
49.	Abdul Jabbar	Jaffer Sadiq	Ouch	1.01.75	35	7	3	10
50.	Mohtasham	Muhammad Khan	Indrag	21.03.73	35	7	3	10
51.	Said Hassan	Shah Hassan	Bahar	3.03.76	35	7	3	10
52.	Aziz Khan	Fateh Khan	Bahar	8.09.70	35	7	3	10
53.	Pir Hussain	Leopold Khan	de	15.04.75	35	7	3	10
54.	Amir Khan	Abdul Jabbar Khan	Bahar	8.06.75	35	7	3	10
55.	Hussain Khan	Gul Zamin Khan	Indrag	30.03.71	35	7	3	10
56.	Ali Bahar	Jahan Bahar	de	5.03.71	35	7	3	10
57.	Gul Habib Khan	Sayid Khan	Mahul Tangal	9.04.70	35	7	3	10
58.	Faiz Khan	Kari Khan	Khat Bahar	35	7	3	10	10
59.	Wazir Gul	Jamat Gul	Chakara	7.03.73	35	7	3	10
60.	Irfan Khan	Gul Sharif	Tangal Bahar	15.07.74	35	7	3	10
61.	Hisar Ali	Shahar Bahar	Bahar	15.04.70	35	7	3	10
62.	Hussain Fahim	Hussain Hassan	Chakara	10.02.76	35	7	3	10
63.	Mohammad Ishaq	Wali Hussain	Mahar	1.05.74	35	7	3	10
64.	Hisar Gul	Bakir Gul	Bahar	1.04.74	35	7	3	10
65.	Bahar Zaid	Khan Bahar	Bahar	1.02.71	35	7	3	10
66.	Katullah	Hussain Gul	Ouch	9.03.75	35	7	3	10
67.	Muhammad Ahmad	Omar Javid	Chakara	24.04.74	35	7	3	10
68.	Tangal Abdur	Muhammad Khan	Bahar	15.08.68	35	7	3	10
69.	Bahar Zaid	Muhammad Sadiq	Bahar	4.02.72	35	7	3	10
70.	Aam Khan	Said Hussain	de	15.02.74	35	7	3	10
71.	Said Ali	Shahar	Chakara	35	7	3	10	10
72.	Iqbal Din	Tajuddin Din	de	1.04.75	35	7	3	10
73.	Shah Hassan	Muhammad Ishaq	Ouch	3.03.76	35	7	3	10
74.	Fazal Khan	Fazal Bahar	Dhara	4.10.71	35	7	3	10
75.	Muhammad Ishaq	Muhammad Nazir	Ouch	3.01.73	35	7	3	10
76.	Abdul Hussain	Abdul Ghaffar	Tangal	25.04.74	35	7	3	10
77.	Muhammad Ishaq	Shah Jahan	de	4.11.72	35	7	3	10
78.	Shah Hussain	Shah Hassan	de	1.05.74	35	7	3	10
79.	Shah Wali Khan	Muhammad Hassan	Khat Bahar	20.05.71	35	7	3	10

6

80. Mohammed Dawood Khan,	Birkhurdar,	Khairabad.	4.3.77	20	7	30
81. Ussaa Ghazi,	Sadashah Said,	Brangola.	2.5.62	20	7	30
82. Saravar Khet,	Motabar Khan,	Tangai(b)	-	20	7	30
83. Sardar Ali Shah,	Gul Bhab,	Aubour.	-	20	7	30
84. Noor Badshah,	Gul Husain,	Kotigram.	30.3.71	20	7	30
85. Izzatol,	Bokht Ahsad,	Badvan,	1.5.64	20	7	30 (O/A)
86. Fazal Irabad,	Mohammed Afzal Begam,	-	2.2.71	20	5	28
87. Nasib Nawaz,	Said Aziz,	Tangai(B)	6.12.72	20	5	28
88. Fazal Khaliq,	Fazal Ghani,	Khadigah.	19.6.57	20	5	28 (O/A)
89. Sajidhanour Rehman,	Akbar Noor,	Kotigram.	20.6.72	20	5	28
90. Mohi Iqbal,	Mali Mohammed,	Brangola.	12.12.6	20	-	25 (O/A)
91. Asghar Khan,	Abour Rehman,	Chakdara.	25.3.75	20	-	25
92. Mohammed Razaq,	Aziz Gul,	Brangola.	17.8.74	20	-	25
93. Ali Mohammed,	Iqbal Mohammed,	Badvan.	-	20	-	25
94.						

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 ASSISTANT COMMISSIONER (M)
 DISTRICT HEADQUARTERS
 RAJSHAHI

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35. Hidayatullah Khan S/o Badshah Muhammad R/o Warai
1. Salim Khan S/o Amir Nawaz Khan R/o Ouch 97/50 GPS: Add. PF 73 Vice Muhammad Farman
 2. Dawood Shah S/o Farid Badshah r/o Ramora 138/50 Vice Hazrat Termination
 3. Muhammad Ithad S/o Wali Muhammad R/o Nigram 39/50 Vice Terminated.
 4. Haimdur Rahman S/o Fazli Rahman r/o Badwan 40/50 Shorehing Vice AwmuD Din Terminated
 5. Pir Muhammad S/o Itbar Khan 2.7.74 41/50 Mula Patai Vice Khir Bahadar Terminated
 6. Azizullah S/o Rahatullah 15.9.70 Mula Patai Vice Halim Terminated
 7. Bashir Muhammad S/o Sarfaraz Khan R/o Gani 43/45 Takht Band Vice Terminated
 8. Farid Khan S/o Awal Khan R/o Chakdara 11.5.77 44/45 Jugha Vice Fazal Qadir Terminated
 9. Noor Zaman S/o Muslim Khan R/o Tindodog 45/45 Terminated
 10. Azim Khan S/o Fateh Khan 15.5.7 46/45 Vice Bahadar
R/o Batan. Terminated.

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- 35. Hidayatullah Khan S/O Badshah - 1.2.73 - 59/50 - HPS Ch... - Vice Muhammad
- Muhammad R/O Warai
- 36. Wajidur Rahman S/O D... - 2.9.70 - 60/43 - HPS... - Vice Sh...
Muhammad
- 37. Masibur Rahman S/O Sherullah - 10.4.70 - 63/43 - HPS Warai - Vice Shahaullah
R/O Chapar

Bull/Bull All 1/53

40/41

12/75

1/53

6/7/75

- 1. Salim Khan S/O Amir Nawaz Khan - 7.4.75 - 37/50 - G.S. add. - Vice Muhammad
R/O Ouch
- 2. Dawood Shah S/O Farid Badshah - 6.3.71 - 138/50 - " Ramora - Vice Hasnat Huss
R/O Ramora
- 3. Muhammad Ithad S/O Wali Muhammad - 1.6.72 - 35/50 - " Ramora - Vice Rashed Shah
R/O Nigram
- 4. Hamidur Rahman S/O Fazli Rahman - 6.6.74 - 40/50 - " Shorshing - Vice Aswud Din
R/O Badwan
- 5. Pir Muhammad S/O Itbar Khan - 2.7.74 - 41/50 - " Mula Patal - Vice Khir Bahad
R/O Batan
- 6. Azizullah S/O Rahatullah - 15.9.70 - 42/45 - " Jabgali - Vice Gul Mallin
R/O Chakdara
- 7. Bashir Muhammad S/O Sarfaraz Khan - 10.3.73 - 43/45 - " Takht Band - Vice Sanib Zada
R/O Tangai
- 8. Farid Khan S/O Awal Khan - 11.5.77 - 44/45 - " Jugha - Vice Fazal Qadi
R/O Chakdara
- 9. Noor Zaman S/O Muslim Khan - 1.12.75 - 45/45 - " Jangal - Vice Musawir
R/O Tindodog
- 10. Azim Khan S/O Fatch Khan - 15.5.77 - 46/45 - HPS Beyarai - Vice Bahadar
R/O Batan

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(CUSHAN CHANI)

District Education Officer,
(M) Primary Dir at Tangora

TERMS & CONDITIONS.

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) TANGORA, TANGORA

- Endst: No. _____ / PBD/ dated Tangora on the _____ / 6/ 75
1. They will be governed by such rules & regulations as may be prescribed by the Govt. from time to time for the benefit of the Govt. service to which they belong.
 2. Their services will be liable to termination on one month's notice from either side. In case of resignation without notice no month's pay will be forfeited in lieu thereof.
 3. They should join the posts within one month of the issue of this notification.
 4. Their inter-annual merit will be determined in accordance with the merit of departmental selection committee.
 5. Charge report should be submitted to the concerned authority.
 6. They shall be on probation for a period of two years and will have to pass departmental examination. In case of failure to pass the departmental Exam he will have to give one more chance. If he fails again, then services will be terminated on expiry of two years. If a trained teacher, the services of an untrained teacher occupying the post will be terminated.
 7. Their original certificates will be checked and forwarded to the concerned institution/BISE/R... Islamic Madrasa...
over charge.
 8. Service books of the teacher must be checked and forwarded to the concerned authority before handing over charge.

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**OFFICE OF THE DISTT: EDUCATION OFFICER (MALE) PRIMARY DIR AT
TEMARGARA**

Consequent upon their selection by the Departmental Selection Committee, the Distt: education officer (M) Pry : Dir at Timargara has been pleased to appoint the following trained PTC, candidates at the schools noted against their names in BPS, No.? (Rs.1480-81-2695 plus usual allowances) as admissible under the rules with immediate effect subject to the existing terms and condition:-

S.No. Name, father's name & address, D/O Birth, No of School where posted

1- Shahbud Din S/O Muhammad zafar 3.1.76 15/54 GPS: Done PF:73 Vikarim Zada
Terminated as not selected on merit.

PF-78

- 1- Salim khan S/O Amir Nawaz Khan 7.4.75 R/O Ouch 37/50 GPS:Ado PF-7 vice
Muhammad Sh terminated -Do-
- 2- Dawood Shah S/O farid badshah 6.3.71 R/O Ramora 38/50 "Ramora Vice
hazrat Hussan terminated-Do-
- 3- Muhammad Ithad S/O Wali Muhammad 1.6.72 R/O Nigran 39/50 "ragbanai. Vice
badshah Sat terminated-Do-
- 4- Hamidur Rahman S/O Fazli Rahman 6.6.74 R/O Badshah 40/50 "Shorshing.
Vice Anwmud Dir Terminated -Do-
- 5-
- 6- Azizullah S/O Rahatullah 15.9.70 R/O Chakdara 42/45 " Jahagai. Vice
Terminated-do-
- 7- Bashir Muhammad S/O Sarfaraz khan R/O Tangi 10.3.75 43/45 " takhta Band.
Vice Sahib Zada terminated -Do-
- 8- Farid khan S/O Awal Khan 11.5.77 R/O Chakdara 44/45 " Jugha. Vice Fazal Qad
terminated-Do-
- 9- Noor zaman S/O Muslim Khan 1.12.76 R/O Tindodog 45/45 "Bearad. Vice
Musawir khan terminated -Do-
- 10-Azim khan S/O Fateh Khan 15.5.77 R/O Batan 45/45 MPS: Beyarad. Vice
Bahadur Khan terminated-Do-

USMAN GHANI

**Distt: Education Officer,
(M) Primary Dir At Taimergara**

**OFFICE OF THE DISTT: EDUCATION OFFICER (M) PRIMARY DIR AT
TAIMERGARA.**

Endst: No 2034-2196/PED/ Dated Taimergara the 24.6.97

A.M.A. - ~~①~~ ~~②~~ ~~③~~ ~~④~~ ~~⑤~~ ~~⑥~~ ~~⑦~~ ~~⑧~~ ~~⑨~~ ~~⑩~~ ~~⑪~~ ~~⑫~~ ~~⑬~~ ~~⑭~~ ~~⑮~~ ~~⑯~~ ~~⑰~~ ~~⑱~~ ~~⑲~~ ~~㉑~~ ~~㉒~~ ~~㉓~~ ~~㉔~~ ~~㉕~~ ~~㉖~~ ~~㉗~~ ~~㉘~~ ~~㉙~~ ~~㉚~~ ~~㉛~~ ~~㉜~~ ~~㉝~~ ~~㉞~~ ~~㉟~~ ~~㊱~~ ~~㊲~~ ~~㊳~~ ~~㊴~~ ~~㊵~~ ~~㊶~~ ~~㊷~~ ~~㊸~~ ~~㊹~~ ~~㊺~~ ~~㊻~~ ~~㊼~~ ~~㊽~~ ~~㊾~~ ~~㊿~~ ~~1~~ ~~2~~ ~~3~~ ~~4~~ ~~5~~ ~~6~~ ~~7~~ ~~8~~ ~~9~~ ~~10~~ ~~11~~ ~~12~~ ~~13~~ ~~14~~ ~~15~~ ~~16~~ ~~17~~ ~~18~~ ~~19~~ ~~20~~ ~~21~~ ~~22~~ ~~23~~ ~~24~~ ~~25~~ ~~26~~ ~~27~~ ~~28~~ ~~29~~ ~~30~~ ~~31~~ ~~32~~ ~~33~~ ~~34~~ ~~35~~ ~~36~~ ~~37~~ ~~38~~ ~~39~~ ~~40~~ ~~41~~ ~~42~~ ~~43~~ ~~44~~ ~~45~~ ~~46~~ ~~47~~ ~~48~~ ~~49~~ ~~50~~ ~~51~~ ~~52~~ ~~53~~ ~~54~~ ~~55~~ ~~56~~ ~~57~~ ~~58~~ ~~59~~ ~~60~~ ~~61~~ ~~62~~ ~~63~~ ~~64~~ ~~65~~ ~~66~~ ~~67~~ ~~68~~ ~~69~~ ~~70~~ ~~71~~ ~~72~~ ~~73~~ ~~74~~ ~~75~~ ~~76~~ ~~77~~ ~~78~~ ~~79~~ ~~80~~ ~~81~~ ~~82~~ ~~83~~ ~~84~~ ~~85~~ ~~86~~ ~~87~~ ~~88~~ ~~89~~ ~~90~~ ~~91~~ ~~92~~ ~~93~~ ~~94~~ ~~95~~ ~~96~~ ~~97~~ ~~98~~ ~~99~~ ~~100~~

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PRIMARY DIR AT TIMARGARA.

DELEGATION:-

Consequent upon their selection by the Departmental Selection Committee, the District Education Officer (M) Pr: Dir at Timargara has been pleased to appoint the following trained PTC Candidates at the schools listed against their names in BPS, No. 7 (Rs. 1430-84-2695 plus usual allowances admissible under the rules with immediate effect subject to the existing recruitment conditions:-

Name, Father's Name & Address	D/O Birth	No of School where merit. Posted	PF	Remarks
Shahbud Din S/O Muhammad Zafar R/O Talaw	3.1.76	15/54 GPS:Done	PF:73	V:Karim Zada Term: do- Terminated as not selected on merit
Isarud Din S/O Muhammad Waid R/O Shiringal	1.7.77	16/54 " Siagan	"	V:Umer Muhammad Term: do-
Salshullah S/O Muhammad Ghafar R/O Dambar Gula	28.3.74	17/54 " Kilot	"	V:Khan Zada Term: do-
Muhammad Islam S/O Gdam Muhammad R/O Katan	22.10.76	18/54 " Junkai	"	V:Muhammad Jan Term: do-
Habib Zada R/O Shohabullah R/O Bhogrupal	16.6.77	19/54 " Kuchkal	"	V:Dakht Ali Term: do-
Akbar Ali S/O Said Afzal Gulandai	18.2.68	20/53 " Tangal Sar	"	V:Sahib Zada Term: do-
Karim Zada S/O Hamza Khan R/O Garagh Galai	9.4.73	21/52 " Ahahoor (P)	"	V:Raw Muhammad Term: do-
Taqiullah S/O Saad Afsar R/O Thordhral	4.5.50	22/51 " Wanjo	"	V:Nagar Muhammad Term: do-
Mubarak Zeb S/O Fazal Wahid R/O Dir	1.1.69	23/51 MPS:Qashqari (B)	"	V:Lumsail Term: do-
Achrafullah S/O Muhammad Naem R/O Kachkool	1.1.78	24/50 GPS:Doodhah	"	V:Taqiullah Term: do-
Farid Khan S/O Izul Khan R/O Pacha Kali	6.6.73	25/49 " Khan	"	V:Shakhi Jan Term: do-
Moorul Islam S/O Naqib Ahmad R/O Dir	1.6.75	26/49 " Dankar	"	V:Juma Faqir Term: do-
Salahud Din S/O Khushal Khan R/O Karporai	15.8.73	27/49 MPS:Vegal	"	V:Massinullah Term: do-
Khista Bor Khan S/O Khista Rahman R/O horingal	10.4.74	28/49 GPS:Janas Kandw	"	V:Jamshid Term: do-
Khalid Hassan S/O Ibrahim Jan R/O Dir	1.7.76	29/49 " Kogyal	"	V:Muhammad Han Term: do-
Guhar Rahman S/O Muhammad Ghufra R/O Charagh Galai	1.1.73	30/49 " Achar (B)	"	V:Mahibur Rah Term: do-
Pir Muhammad S/O Rahmat Jan R/O Jabalok	26.5.76	31/48 " Garshal (B)	"	V:Habibullah Term: do-
Azar Khan S/O Gul Muhammad R/O Kharo	20.4.73	32/46 " Koheta Banda	"	V:Navsher Term: do-
Faizer Rahman S/O Nazrat Khan R/O Jabalok	2.1.74	33/46 MPS:Kuchkal	"	V:Ashfaqullah Term: do-
Muhammad Sadiq S/O Muhammad Rafiq R/O Mono Banda	16.5.72	34/46 GPS:Rohjandrai	"	V:Shah Nazar Term: do-

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19.6.72	25/53	GPS: Masogal	"	V: Abdur Rahman	Term: do
17.4.76	24/54	" Topat	"	V: Rafiq Muhammad	Term: do
23/55	23/55	" Tangor	"	V: Wahidur Rahman	Term: do
20.2.74	22/55	MRS: Rando Khan	"	V: Muhammad Khan	Term: do
21/55	21/55	GPS: Masogal PF-74	"	V: Sadat Khan	Term: do
1.4.75	53/29	UPS: Masogal	"	V: Parvaz Akter	Term: do
4.2.75	52/35	"	"	V: Muhammad Khan	Term: do
4.3.75	51/39	MRS: Soret Danke	"	V: Muhammad Khan	Term: do
1.2.77	50/39	" Patork	"	V: Muhammad Khan	Term: do
9.2.77	49/39	"	"	V: Muhammad Khan	Term: do
1.3.74	48/39	MRS: Kator	"	V: Muhammad Khan	Term: do
15.3.69	47/39	" Don Seem	"	V: Muhammad Khan	Term: do
4.4.74	46/44	"	"	V: Muhammad Khan	Term: do
11.3.75	45/44	" Elm Gannat	"	V: Muhammad Khan	Term: do
21.12.73	44/44	" Elm Kase	"	V: Muhammad Khan	Term: do
16.5.72	43/44	" Bar Kati	"	V: Muhammad Khan	Term: do
1.2.68	42/44	" Khan Abad	"	V: Noor Islam	Term: do
20.5.75	41/44	" Sannat	"	V: Shah Hussain	Term: do
13.2.74	40/44	" Panakot	"	V: Dawood Khan	Term: do
15.9.74	39/44	" Khatun (H)	"	V: Insha Haya	Term: do
3.2.74	38/46	" Darwal (F)	"	V: Muhammad Alam	Term: do
37/16	37/16	GPS: Tal 3	"	V: Inayatullah	Term: do
25.11.74	36/16	MRS: Durratun Naja	"	V: Abdur Rahman	Term: do
4.4.74	35/16	MRS: Rando Khan	"	V: Abdur Rahman	Term: do

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1. Muhammad Tahir S/O Abdul Haq R/O Lalqila.	18.1.71	27/54	GPS: Dakhal	V: Aminu Term:
2. Musalia Khan S/O Khairur Rahman R/O Bishgram.	18.1.73	28/54	" Kalpani.	V: Dilawar Term:
3. Dilawar Jan S/O Ahmad Jan R/O Mirgam (B)	1.1.66	29/54	" Barawal 3 "	V: Tajud Di Term:
4. Nishan Haidar S/O Azizul Hakim R/O Barawal.	30.3.53	30/53	" Krapa.	V: Mukhtiar Term:
5. Hamad Malik S/O Fazli Malik R/O Barawal.	15.6.76	31/53	" Binar (P) "	V: Muhammad Term:
6. Amir Badshah S/O Hussin Khan R/O Shagai.	2.4.76	32/53	" Marwaro "	V: Muhammad Term:
7. Muhammad Javid S/O Sher Bakdar R/O Shagai.	20/4/74	33/53	" Shahtan "	V: Hanifullah Term:
8. Anwar Badshah S/O Jehan Badshah R/O Deedan Pura.	22.2.73	34/53	" Sro Kala "	V: Mukhtiar Term:
9. Muhammad Younar S/O Yaq Khan R/O Hanial.	1.4.76	35/53	" Shoune Hala "	V: Hanifullah Term:
10. Muhammad Haid Khan S/O Khan Badshah R/O Shagai.	1.5.76	36/50	" Maroono.	V: Hazrat Jan Term:
11. Fazli Subhan S/O Qazi Khan R/O Mian Dchri.	15.3.67	37/48	" Bil Bani.	V: Hanifullah Term:
12. Mahmood Jan S/O Toor Jan R/O Barawal.	4.4.72	38/47	" Babagan.	V: Muhammad Term:
13. Hanifur Ahad S/O Fazal Ahad Kumbaur.	1.5.73	39/46	" Farz Pongh Khan "	V: Hanifullah Term:
14. Muhammad Ahad S/O Ghulam Ahmad R/O Barawal.	20.1.71	40/46	" Bakki Dehal.	V: Muhammad Term:
15. Gul Gul S/O Bahar Khan R/O Muzlim Khwar.	15.10.75	41/46	" Kolkata Dehri "	V: Hanifullah Term:
16. Abdulullah S/O Badshah Rahman R/O Bishgram.	1.3.76	42/46	MPS: Kolalano Shah	V: Muhammad Term:
17. Farid Khan S/O Bakhsh Akbar Khan R/O Nagotal.	25.11.73	43/46	GPS: Kass Gumbat "	V: Hafizur Term:
18. Muhammad Tufial S/O Safur Rahman R/O Garawni.	4.4.73	44/45	" Kass Gumbat "	V: Rahman Ze Term:
19. Mubark Said S/O Hakim Said R/O Kumbaur.	5.4.74	45/45	" Larkandi Balo Khan.	V: Javid Term:
20. Islam Gul S/O Jhlan Gul R/O Khathai.	1.5.72	46/45	" Larkandi B: Khan;	V: Jawhar Iqbal Term:
21. Muhammad Hussin S/O Umer R/O Kags.	5.8.68	47/45	" Mirgam (K) "	V: Muhammad Term:
22. Qasim Jan S/O Toor Jan R/O Chinda Kot.	13.3.73	48/44	" Umer Rahman Koorona "	V: Muhammad Term:
23. Muhammad Salim S/O Muhammad Zahir Shah R/O Hido.	15/5/73	49/44	" Nishwano "	V: Muhammad Term:
24. Hanifur Rahman S/O Mian Gul R/O Karkhani.	10.5.70	50/44	" Barlara "	V: Fazli Subhan Term:
25. Sher Zada Khan S/O Finda Khan R/O Khathai.	10.1.74	51/44	MPS: Muhammad Zada Koorona	V: Niaz Muhammad Term:
26. Maul Haq S/O Ehsanul Haq R/O Bishgram.	1.5.74	52/44	" Garbala Koorona	V: Bahrawar Jan Term:
27. Ghulam Hussin S/O Ghulam Muhammad R/O Shagai (M)	8.5.72	53/44	" Kassa	V: M: Nabi. Term:
				V: Muhammad Zakirul Term:

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MPS: 16
MS: Anadgzaal Ch...

Shah Asim S/O Muhammad Jan Khan Bagei (M)	1.1.73	54/45	GPS: Balo Khan	FF-74	V: Khan Saad Zada Ter
Khan S/O Sahib Zeb Khan	16.12.70	55/44	" Brikandi "		V: Rahmanul Term: do-
Gubhan S/O Ajbar Khan Okrai	2.6.70	56/44	" Kass Barikot "		V: Sahib Sult Term: do-
Jan S/O Said Amin Jan Quana	12.5.68	57/44	" Dod Doon "		V: F: Nam Term: do-
Khan S/O Sahib Sadiq Okrai	10.6.69	58/43	" Panj. "		V: Inayatn R Term: do-
Q Bagan S/O Gran Malak Okrai	5.10.70	59/43	" HPS Shahabor "		V: Muhammad Term: do-

PF-25

Gul S/O Itbar Gul Bikot	1.3.76	91/56	GPS: Tange Mans	FF-75	V: Noor Jase Term: do-
Umer S/O Umer Saeed Bala	1.2.71	92/56	" Bando Khawar "		V: Muhammad Sa Term: do-
Fazir S/O Abbas Moor	1.4.71	93/56	" Bandagai. "		V: Muhammad Sa Term: do-
J Naeem S/O Muhammad Karim Al Batai	1.1.72	94/56	" Shagai "		V: Fatch Rahma Term: do-
Haq S/O Fazli Jan (P)	25.7.70	95/56	UPS: Haji Abad2		V: Sher Hayat Term: do-
Zahid S/O Rahman Gul h (P)	24.12.67	96/56	" Galgot "		V: Muhammad Hayat Term: do-
Gul S/O Yar Gul Bakai Khawar	12.9.75	97/56	" Nangera. "		V: Tahir Ayoub Term: do-
Abbar S/O Abdul Kabir Jan (P)	2/4/73	98/56	GPS: Bilateer		V: Fazal Khaliq Term: do-
Gul S/O Inzar Gul h (P)	2.2.71	99/56	" Jeekanda. "		V: Muhammad Ra Term: do-
Muhammad S/O Muhammad Ayoub h (P)	1.4.72	100/55	" Ghawro Rabat "		V: Al: Saqirid
Muhammad S/O Amir Zada h (P)	11.10/24/104/55	101/55	" Bando Khawar "		V: Amrullah Term: do-
Amin Said S/O Zada F/O T. M. K.	25.5.72	102/55	" Bital Rans "		V: Amanullah Term: do-

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Saifur S/O Ali Haidar Barkhina	23.10.74	103/56	GPS: Qandahari	PF-26	V: Balahud Jan Term: do-
Saifur S/O Mahmood Barkhina	10.2.74	104/54	" Batora. "		V: Muhammad Murad Term: do-
Shah S/O Ghulam Muhammad Barkhina	13.2.78	105/54	" Shikwana. "		V: Gul. Qadar Term: do-
Muhammad S/O Muhammad Haidar Barkhina	17.2.77	106/54	" Batora. "		V: Muhammad Sa Term: do-
Saifur S/O Khan Bahadar Barkhina	10.1.76	107/54	" Agar Kot "		V: Khurshid Muham Term: do-

7/13

Abul Salam S/O ... 13.5.75	32/54 NBS, Goldai, Vice Badshah Zada terminated.
Abul Nawab S/O Dilbar Jan 2.1.72	33/54 " Manzai Vice Alam Khan Nahag. Termtined.
Muhammad Amin Shah Nazar R/O Batalai 5.2.76	34/53 " Sondrat Vice Anwar Zeb Terminated.
Muhammad S/O Baz Muhammad 15.4.77	35/53 " Takhtabang. Vice Islamu- Din Term:
Muhammad Din S/O Shah Muhammad 7.6.74	36/53 " Sia Gawrani Vice Muhammad Issa Term:
Muhammad S/O Mumin Khan 1.1.74	37/53 " Shahgai (B) Vice Gul Abdar- Khan Term:
Muhammad Israr S/O Muhammad 2.3.73	38/53 " Shahgai, Vice Shaukat- Ali Term:
Muhammad Rahim S/O Shah Nazar 6.3.74	39/49 UFS: Razagai. Vice Hamidullah Terminated.
Muhammad S/O Amir Khan 16.4.75	40/48 MFS: Dolar (F) Vice Muhammad Hamayun Term:
Muhammad Zaman S/O ... 28/5/73	41/48 " ... Vice Muhammad Shah Terminated.
Muhammad S/O ... 28/5/73	43/45 " Nishan Banda Vice Inayatullah Terminated.
Muhammad S/O Marof Bacha 15/6/73	44/45 " ... Vice Badshahul- Din Terminated.
Muhammad S/O Faten Sher 28/5/72	45/45 MFS: Ganshal (F) Vice Ghani Bahman Terminated.
Muhammad Hamid S/O Shoker 1.2.71	46/45 " Srafo. Vice Muhammad- Din.
Muhammad Ayaz S/O Amir Zada 1.1.72	47/45 " Seroi Vice Wali Khan Terminated.
Muhammad Minir S/O Abdur Rasool 7.4.74	48/45 " Gamdat. Vice Sultan Alam Terminated.
Muhammad Iqbal S/O Amir Zada 15.3.76	49/45 " Badalai (F) Vice Dawood Khan Terminated.
Muhammad S/O Inayatullah 12.5.72	50/45 " Katogram (B) Vice Shaukat Ali Terminated.
Muhammad Hayat S/O Fazal Haq 18.3.70	51/45 " Shahgai (B) Vice Anwar Zeb Terminated.
Muhammad Wahid S/O Muhammad Khan 16.4.76	52/45 " Mitora Vice Shaikh Muhammad Terminated.
Muhammad Ahmad S/O Sultan Ahmad 3.5.76	53/45 " Shalgah. Vice Iqbal Khan Terminated.
Muhammad Zada S/O Faqir Zada 20.2.74	54/45 " Daboona Vice Anwar Saeed Terminated.
Muhammad Shah S/O Muhammad Qasim 22.8.72	55/45 " Gondal. Vice ... Terminated.
Muhammad Rahim S/O Mula Gul 10.5.73	56/44 " Jaat. Vice ... Terminated.
Muhammad Ayub S/O ... 22.9.75	57/44 " Kamali. Vice ... Terminated.
Muhammad S/O Ghazan Ali 29.10.68	65/43 " ... Vice Haq Nawaz Terminated.

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Muhammad S/O Sultan Muhammad Kandai	16.4.72	30/54	MES, Ali Banda	PF/76	V. Faza	Term:
Muhammad S/O Nimatullah S/O Kotkai	16.4.72	30/54	MES, Ashiralai		V. Rinul Ha	Term:
Azizur Rahman S/O Khista R/O Munda	1.3.75	30/54	MES, Rahmat tangai		V. Ramesh No	terminated
Salqadar Khan S/O Nawroz Khan R/O Sadrkhalai	4.2.70	31/54	MES, Rangai		V. Khudayar	terminated
Muhammad Khan S/O Sher Ahmad Khan R/O Lata Khail	1.1.72	32/54	MES, Rangai		V. Muhammad	terminated
Muhammad Khan S/O Syed Yaqub Khan R/O Garra	20.1.66	35/54	MES, Rangai		V. Mohd Shuaib	terminated
Siraj Mohd S/O Sultan Mohd R/O Rahimabad	0.1.72	34/54	MES, Rangai		V. Fazaal Hakim	terminated
Dawlat Jan S/O Shagai R/O Hissarak	3.1.67	34/54	MES, Shagai		Vice Khan Mohd	terminated
Zahid Khan S/O Tawtoor Khan R/O Garra	20.5.67	36/54	MES, Rangai		Abdur Rouf	terminated
Mohd Miran S/O Mulagul R/O Landakar	7.4.63	37/54	MES, Damtal		Vice Abidullah	terminated
Mohd Nagin Khan S/O Akbar Khan R/O Gulbela	1.1.76	38/54	MES, Gatkai		Zakir Hussain	terminated
Latif Shah S/O Noghhan Shah R/O Lata Kambat	1.5.70	39/54	MES, Tarai		Yusuf Khan	terminated
Sahir Mohd S/O Taza Khan R/O Rahimabad	16.4.76	40/54	MES, Bitalkasa		Siraj Gul	terminated
Muhammad Khan S/O Mohibullah R/O Khazana	2.3.73	41/54	MES, Shang		Sherzada	terminated
Mohd Shuaib S/O Kha Facha R/O Damtal	16.10.72	42/54	MES, Parak		Ali Haider	terminated
Ihsanullah S/O Ajibullah R/O Rahimabad	1.10.64	43/51	MES, Dardban		Shah Nasib Khan	terminated
Muhammad Khan S/O ... R/O ...			MES, Tindarkon		Mohd Tariq	terminated
<u>S.F. 27. Dir 5.</u>						
Bakht Sher Khan S/O Hamim Beg R/O Jelar	25.4.70	24/56	MES, Dular		Zakir Rehman	terminated
Mohd Tahir S/O ... R/O Talar	16.10.67	27/56	MES, NO. 3		Tariq Mahmood	terminated
Muhammad Khan S/O Nawab Khan R/O ...	11.4.71	26/56	MES, Batlai (C)		Muhammad	terminated
Muhammad S/O Jataundar R/O Gugiyal	0.1.72	27/56	MES, Baghmanai		Muhammad	terminated
Muhammad S/O Finda Noor R/O Khail	1.1.70	28/55	MES, Batlai (C)		Islamgul	terminated
Muhammad S/O Abd ... R/O ...	1.4.72	27/56	MES, ...		Muhammad	terminated
Muhammad S/O Kazi Khan R/O Umarsalai	2.2.75	30/54	MES, ...		Muhammad	terminated
Muhammad S/O Mohd Bin R/O ...	1.7.72	31/54	MES, Kohai		Vice Chairman	terminated

(See Page No. 6)

[Handwritten signature]

Attest
Tariq
10.10.10
S. F. 27. Dir 5

59/43 GPS:Shapur

9/c
 Vice, Y...
 Muhammad Y...
 Vice, Sh...
 Terminated do
 Vice Shahuallah
 Terminated do

- 1. Muhammad Khan S/O Badahab- 1.1.70
- 2. Muhammad R/O Warai.
- 3. Saadur Rehman S/O Bela 2E-2-70
- 4. Muhammad
- 5. Noshullah S/O Sheru... 10.4.72
- 6. R/O Chapter

60/43 " Kogano Khawar
 63/43 MFS:Arak.

PE-28

- 1. Salim Khan S/O Amir Nawaz Khan R/O Cuch. 7.4.75
- 2. Duwood Shah S/O Fazid Badahab R/O Ramora. 6.3.74
- 3. Muhammad Ithad S/O Wali Muhammad R/O Mirra. 1.6.72
- 4. Hamidur Rahman S/O Fazli Rahman R/O Badahab. 6.6.74
- 5. Ali Muhammad S/O... R/O Batan. 1.1.74
- 6. Azizullah S/O Rabatulillah R/O Chakdara. 15.9.70
- 7. Bashir Muhammad R/O Badahab Khan R/O Tangai. 10.3.73
- 8. Farid Khan S/O Awal Khan R/O Chakdara. 11.5.77
- 9. Noor Zaman S/O Muslam Khan R/O Tindodog. 1.1.75
- 10. Azam Khan S/O Patchekhan R/O Batan. 15.9.77

- 37/50 GPS:Ado. PE-28 Vice Muhammad Sa Terminated do
- 38/50 " Ramora. Vice Maerat Hussa Terminated do
- 39/50 " Ragbanai. Vice Badahab Sa Terminated do
- 40/50 " Shorshing Vice Aswud Sa Terminated do
- 41/50 " Mula Takai Vice Khir Bahadur Terminated do
- 42/45 " Jahagui Vice Dal Bahadur Terminated do
- 43/45 " Takhta Band Vice Sahib Zada Terminated do
- 44/45 " Jugha. Vice Fazal Qad Terminated do
- 45/45 " S... Vice Munawir KI Terminated do
- 46/45 MFS:Koyana. Vice Bachalar K Terminated do

(USMAN SHANI)
 Distt: Education Officer,
 (M) Primary Dir at TEMERGARA.

TERMS & CONDITIONS.

OFFICE OF THE DISTT: EDUCATION OFFICER (M) PRIMARY DIR AT TEMERGARA.
 Endst: No 2034-2196 / PED/ Dated Temergara the 24 / 6 / 77.

1. They will be governed by such rules & regulations as may be prescribed by the Govt. from time to time for the category of the Govt. servant to which they belong.
2. Their services will be liable to termination on one month's notice from either side. In case of resignation without notice, one month's pay will be forfeited in lieu thereof.
3. They should join the posts within one month of the issue of this notification.
4. Their inter-se seniority will be determined in accordance with the merit of departmental selection committee.
5. Charge report should be submitted to all concerned.
6. They shall be on probation for a period of two years and will have to pass departmental examination. In case a candidate fails to pass the departmental exam, he will be given one more chance. If he fails again, then services will be terminated. If a candidate is not a trained teacher, the services of untrained teacher occupying the post will be terminated.
7. Their original certificates etc will be checked and verified from concerned institution/BISE/R.D.S. and Islamic Madrasas before hand over charge.
8. Service books of the teachers must be prepared complete in all respects before handing over charge.

ATTESTED

Attested
 S. C. J. S. S. R.
 District Education Officer

9. The declaration of assets should be obtained from them immediately and placed on record.
10. They are required to produce a certificate from the bank to the effect that they have not borrowed any money from the bank for the purpose of their education or for the purchase of land or for any other purpose.
11. If the certificate is not produced, the candidate will be disqualified from the service.
12. No fee is allowed.
13. An undertaking shall be signed from the candidates before they are selected by the committee that they will serve the department for a period of 5 years, unless they are selected by the committee for a shorter period.
14. In case of a person appointed as an untrained teacher, he will have to pass the requisite training examination within a 4 years failing which his services will be terminated.
15. Complete information of each category (separately) in consolidated lists on the prescribed proform (attached) along with charge reports to be submitted by the lower offices to the Director of Education Primary DEOS (M&F) Primary within a week positively.

(USMAN GHANI)
 District Education Officer (M),
 Primary Dir at Temargara.

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) PRIMARY DIR AT TEMARGARA.
 Dated Temargara the 24/16/97.
 No. 2034-2196

Copy of the above is forwarded to:
 1. District Education Officer (M), Primary Dir at Temargara.
 2. District Education Officer (M), Primary Dir at Temargara.
 3. District Education Officer (M), Primary Dir at Temargara.
 4. District Education Officer (M), Primary Dir at Temargara.
 5. District Education Officer (M), Primary Dir at Temargara.
 6. District Education Officer (M), Primary Dir at Temargara.
 7. District Education Officer (M), Primary Dir at Temargara.
 8. District Education Officer (M), Primary Dir at Temargara.
 9. District Education Officer (M), Primary Dir at Temargara.
 10. District Education Officer (M), Primary Dir at Temargara.

(Signature)
 District Education Officer (M),
 Primary Dir at Temargara.

(Signature)
 Kasbar

(Signature)
 J. M. J. J.
 District Education Officer (M),
 Primary Dir at Temargara.

17/12/98
(Signature)

(8)

حضرت صاحب ڈائری کٹر صاحب تقیہ (پیرائون) سوم سرد

عنوان: Appeal Appointment Order NO: 2034-2196
Dated: 24/6/97

جناب عالی!

مؤدبہ ڈائری کٹر صاحب تقیہ (پیرائون) سے۔ کہ فروری 95-94 میں چھٹی سی

مٹرنٹی سکھائی گئی ہے۔ جس میں فروری 675 / 1800 نمبر تک کٹری کا عیاشی حاصل گئی۔

انٹرو لیسٹ۔ اور سہ ماہی ڈائری کٹر صاحب تقیہ (پیرائون) کی شرح 53 ہے۔

کھنڈہ لاقہ PF 78 میں فروری شرح تمام اساتذہ کرام کی شرح 50 تا 45 ہے۔

آرڈر کا پی کی نقل درخواست کے ساتھ منسلک ہے۔

جناب والا!

میں آ۔ صاحبانوں سے بذریعہ درخواست پڑا التجا کر رہی ہوں۔ کہ آپ صاحبان

میرٹھان و بار میں تقیہ کے احکامات صادر فرمادیں۔ میں ڈائری کٹر

تق

آ۔ صاحبان و ماختیار علی ولد مختیار محمد صاحب (خاندانہ) ڈائری کٹر صاحبان۔

کھیل ادرینز - ضلع دین (4)

ATTESTED

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D-9

DIRECTORATE OF PRIMARY EDUCATION,
NWFP, PESHAWAR.

F.No. K.C/LPE/M&A/ETC (M) Dir Appeal/
AD (M&A)-(M)/

No 63322 Dated Pesh: the 5-12-1997

To

The District Education Officer (M)
Primary Dir at Timergara.

Subject:- APPEAL/APPOINTMENT.

Memo:

I am directed to enclose herewith photo stat copy of an application alongwith other documents in respect of Mr, Bakhtiyar Ali S/O Mukhtiyar Muhammad Village Mayar (Khadagzai) Tehsil Chakdara District Dir (L) on the subject noted above and to ask you to submit detail report within three days positively.

Encls: As above.

Salt

FOR/DIRECTOR PRIMARY EDUCATION,
NWFP, PESHAWAR.

Endst: No 63323-24 F.No. & date as above.

Copy to the:-

- 1.
- 2.

Applicant Concerned.

FA to Director Primary Education NWFP, Peshawar.

N. LB 5.12.97

FOR/DIRECTOR PRIMARY EDUCATION,
NWFP, PESHAWAR.

Sajjad Ahmed.

ATTESTED

[Signature]

(E) - (10)

OFFICE OF THE.
DISTT: EDUCATION OFFICER,
(M) PRY: DIR AT TIMERGARA.
NO. 4296 / Dt: 10/12/97.

To:

The Director of Primary,
Education N.W.F.P Peshawar.

Subject: APPEAL/APPOINTMENT.

Memo:

Reference youf F.No.63322 dated 5.12.1997 and
No.63567 dated 8.12.1997 on the subject cited above.

Revised Merit List of PF-75 & PF-78 is submitted
herewith for further orders please. More over the names who xx
have tick marked have been appointed & the others have been xx
left due to over sight, submitted for guidance please.

Encl: as above.

[Signature]
Distt: Education Officer,
(M) Primary Dir at,
Timergara. *[Signature]*
11/12/97

[Handwritten mark]

ATTESTED

[Signature]

DIRECTORATE PRIMARY EDUCATION
NWFP, PESHAWAR.
F.No.7/Vol:I/DPE/M&A/PTC(M)/GEN/
AD(M&A) - (M).No. _____
Dated Pesh: the 23/12/1997.

F-11

To

The District Education Officer (By Name)
(Male) Primary, Dir at Timergara.

Subject: APPEAL/APPOINTMENT.

Memo:

I am directed to refer your letter No.4296, dated, 10-12-1997 on the subject cited above and to say ~~EMX~~ with great concern that your reply /excuse to the effect that " others have been left due to oversight" is not justified under the law. Being District controlling Officer, you are supposed to hold a responsible position in the District and you should avoid such lame excuse in future.

✓ I am therefore directed to ask you being appointing authority of PTC the requisite appeals (already sent to your Office) in the subject case may be disposed Off at your end strictly in accordance with prescribed rules and on merit.

Sd -
ASSISTANT DIRECTOR (M&A)
FOR/DIRECTOR PRIMARY EDUCATION
N.W.F.P, PESHAWAR.

Endst: No. 65934-81

Copy forwarded to the :-

1. Applicants concerned.
2. P.A to Director Primary Education NWFP, Peshawar. local Office.

Zifur
23/12/97
ASSISTANT DIRECTOR (M&A)
FOR/DIRECTOR PRIMARY EDUCATION
N.W.F.P, PESHAWAR.

ATTESTED
[Signature]

G-12

OFFICE ORDER:-

Consequent upon their selection by the departmental Selection Committee, the Distt: Education Officer (M) Pr: Dir at Timergara has been pleased to appoint the following trained candidates and their services are hereby placed at the disposal of the SDEO (M) Timergara for further adjustment w.o.f. 1.3.1998 in accordance with the rules subject to the following terms and conditions:-

S.No.	Name of Candidate.	Father's Name.	Village.	Name of Pr.
1.	Mubanna Hasan Khan	Ghousur Rahman.	Badwan.	PF-78.
2.	Bakhtiar Ali.	Mukhtiar Muhammad.	Khadagzai.	-do-
3.	Asghar Ali.	Gul Muhammad.	Badwan.	-do-
4.	Muhammad Janil.	Muhammad Zahid.	Pato Talash.	PF-75.

TERMS AND CONDITIONS:-

- Charge report should be submitted to all concerned.
- Their original Certificate etc will be checked and verified from the concerned institution before handing over charge.
- They are required to produce Health & Age Certificate from Medical authorities.
- They may not be handed over charge if their age exceed 30 years or 18 years below.

(WADIRULLAH KHAN)
Distt: Education Officer (M)
Primary Dir at Timergara.

OFFICE OF THE DISTT: EDUCATION OFFICER (M) PRIMARY DIR AT TIMERGARA.
Order No. 50-51 / Dated Timergara the 12/4/1998

Copy of the above is forwarded for information and necessary action to:-

- The Sub-Divisional Education Officer (M) Timergara
- The District Accounts Officer Dir at Timergara.

Distt: Education Officer,
(M) Primary Dir at,
Timergara.

ATTESTED

A

OFFICE ORDER.

A-13

Mr. Bakhtiar Ali Trd. PTC Teacher Surplus GPS Khadagzal under Approval/Adjustment vide Distt. Education Officer, Prg, Dir at Timergara, Edst: No. 369/PED/Estt: dated 23.2.1999, is further adjusted against vacant PTC post at GPS Barimkai Sub Divis: Timergara, with effect from 1.4.1999.

Terms and conditions are the same as already given in his 1st Appointment.

No TA/DA is allowed.

Charge report should be submitted to this office.

SUB DIVISIONAL EDUCATION
OFFICER, (M) TIMERGARA.

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (M) TIMERGARA.

Edst: No. 520-24 Estt: Dated Timergara the 22/3/1999.

Copy forwarded for information & compliance etc:-

1. The Distt. Education Officer, (M) Prg, Dir at Timergara, w/ reference to his remarks on the Original approval for adjustment.
2. The DAO Dir at Timergara.
3. The ASDEO(InP;) of the Circle.
4. The Accountant Local Office.
5. The Candidate concerned.

[Signature]
SUB DIVISIONAL EDUCATION,
OFFICER, (M) TIMERGARA.

ATTESTED

[Signature]

14/A

بندہ اصناف کے لئے

المعارض

تالیع ہر ماہ حسیار ملی و لکڑ حسیار قسمہ CMIS سنگی باسین عادی لکڑی اصل و دیر باسین

CNIC: - 15302-0875442-7

M. #. 0314-9729759

Sig. - FOMR



Dated: 21-04-2010

Attested
9

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

_____ OF 2020

Banitia & Ali

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt.

(RESPONDENT)
(DEFENDANT)

I/We Banitia & Ali

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2020

Paraf

CLIENT

ACCEPTED

NOOR MOHAMMAD KHATTAK

SHAHZULLAH YOUSAFZAI

MIR ZAMAN SAFI

&

M. van's
AFRASIYAB KHAN WAZIR
ADVOCATES

OFFICE:

Flat No.4, 2nd Floor, Juma Khan
Plaza, near FATA Secretariat,
Warsak Road, Peshawar.
Mobile No.0345-9383141

BEFORE THE KHYBER PAKHTOON KHWA
SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL No12884/2020

3. Bakhtiar Ali CT GMS Tangay (P).

(Appellant)

Versus

1. The Secretary Elementary and secondary Education Khyber Pakhtunkhwa Peshawar.
2. The Secretary Finance Department Khyber Pakhtunkhwa Peshawar.
3. The Director Elementary and secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer (M) Dir Lower at Timergara.

(RESPONDENTS)

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS, No.1, 3, 4.

Respectfully sheweth:-

PRELIMINARY OBJECTIONS.

1. That the Appellant is not the "aggrieved" persons with the meaning of Article 212 of the Constitution of the Islamic Republic of Pakistan 1973.
2. That the Appellant has got no cause of action /locus standi..
3. That the Appellant has not come to this Honorable court with clean hands.
4. That the Appellant is estopped by his own conduct.
6. That the instant service appeal suffers from laches, hence not maintainable in the present form.
7. That the Appeal is badly time barred by law and rules.

ON FACTS

1. Para-1 of the facts pertains to records hence need no comments.
2. Para-2 of the facts also pertains to record, hence need no comments.
3. Para-3 of the facts regarding the merit position of the appellant pertains to record, whereas the appellant was appointed on the vacant post w.e.f 01.04.1999 (Took over the charge) and served the department from the date ibid, hence claim of the appellant for back benefits along with seniority is not justified nor genuine as per remarks of August Supreme Court i.e "No work No pay".

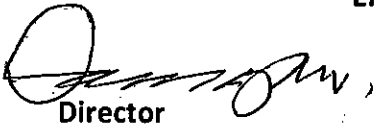
4. Para-4 of the facts is also pertains to record to the effect of the correspondence of the department.
5. Para-5 of the facts is also pertains to record to the effect of the correspondence of the department, whereas the appellant has no locus standi to file the instant time barred appeal.
6. Pertains to record.
7. Para-7 is incorrect to the extent of appointment vide order dated 24-01-1998 whereas it is correct that he was approved for selection as PTC and was placed at the disposal of Sub divisional Education Officer (The appointing authority of PTC teachers at that time), so due to non-availability of the vacant post he was appointed vide order dated 22-03-1999 w.e.f 01-04-1999 (taken over the charge).
8. Para-8 of the facts is correct that after the availability of the post he was appointed as PTC teacher vide order dated 22-3-1999 w.e.f 01-04-1999 (Taken over the charge).
9. Para-9 of the facts is correct that appellant was granted seniority w.e.f 01-04-1999 date of appointment and on such seniority he has also been granted promotional benefits on which he is still working.
10. Incorrect hence denied and further stated that the Appellant does not come in the ambit of the aggrieved person as was appointed on 22-03-1999 and also availed promotional benefits (Promoted to CT B-15), hence the instant service appeal being badly time bard is not maintainable on the ground inter alia:

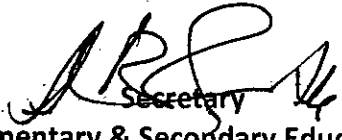
GROUNDS


- A. Incorrect, the Appellant was not appointed vide dated 17-10-1999, so claim for back pay fixation and seniority w.e.f 17-10-1997 is not justified nor legal, hence denied.
- B. Incorrect, and further stated that since his appointment the appellant has been treated as per law rules and policy and all the benefits he deserve, has been awarded.

- C. Incorrect, hence denied details has been submitted in the facts above.
- E. Incorrect, hence denied details has been submitted in the facts above.
- F. In correct detailed reply has been submitted in the Facts above.
- G. In correct detailed reply has been submitted in the Facts above.
- H. That the respondents also seek leave to raise additional grounds at the time of arguments.

It is, therefore, humbly prayed that on acceptance of the above submission, the instant Service Appeal may very graciously be dismissed in favor of the answering respondents with cost.


Director
Elementary & Secondary Education
Khyber Pakhtunkhwa- (3)


Secretary
Elementary & Secondary Education
Khyber Pakhtunkhwa- (1)


District Education Officer(M)
District Lower Dir – (4)