


21.03.2023


Appellant present through counsel.

Asif Masood Ali Shah, Deputy District Attorney for official respondents present. Private respondent No. 6 present.

Request for adjournment was made on behalf of both the parties. Adjourned. To come up for arguments on 05.06.2023 before D.B. Parcha Peshi given to the parties.

SCANNED  
KPST  
Peshawar

  
(Muhammad Akbar Khan)  
Member (E)

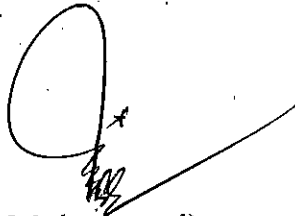
  
(Rozina Rehman)  
Member (J)

02.11.2022

Nemo for the appellant. Mr. Beharamand, Assistant Director alongwith Mr. Muhammad Jan, District Attorney for official respondent No. 1 to 4 present and sought time for submission of reply/comments. Last opportunity is granted to official respondents No. 1 to 4 for submission of reply/comments. None present on behalf of private respondents No. 5 & 6, therefore, notice be issued to them for submission of reply/comments. Adjoined. To come reply/comments as well as arguments before the D.B on 20.12.2022.

5 & 6 respondent were put on notice while counsel was informed telephonically on 14/12/22

Notice also be issued to the appellant and his counsel for the date fixed.



(Mian Muhammad)  
Member (E)



(Salah-ud-Din)  
Member (J)

20<sup>th</sup> Dec. 2022 Appellant present in person. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General alongwith Muhammad Latif, ADO for official respondents present. Private respondent No. 6 in person present. Nemo on behalf of private respondent No. 5, hence his defence is struck off.

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

Respondents have not submitted reply/comments. On the request of learned AAG last opportunity is granted to the respondents for submission of reply/comments on the next date. To come up for reply/comments as well as arguments on 21.03.2023 before the D.B.



(FAREEHA PAUL)  
Member(E)



(ROZINA REHMAN)  
Member (J)


23.08.2022

Nemo for the appellant. Mr. Muhammad Tufail, Assistant alongwith Mr. Naseer-ud-Din Shah, Assistant Advocate General for official respondents No. 1 to 4 present and sought time for submission of reply/comments. Last opportunity granted to official respondents 1 to 4 for submission of reply/comments. None present on behalf of private respondents No. 5 & 6, therefore, notices be issued to them and to come up for submission of reply/comments as well as arguments before the D.B on 31.10.2022.

Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal also be issued to the appellant as well as his counsel for the date fixed.



(Rozina Rehman)  
Member (Judicial)



(Salah-Ud-Din)  
Member (Judicial)

Counsel was informed the date fixed for respondent No. 5 & 6 is out district therefore they were not put on notice

Stipulated period passed reply not submitted.

29.07.2021

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

  
Chairman

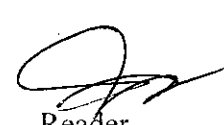
8-11-21

*D.B is not Available, therefore the case is adjourned to 1-3-22.*




01.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 06.06.2022 for the same as before.

  
Reader.

6<sup>th</sup> June, 2022

Proper D.B is not available. Therefore, case is adjourned to 23.08.2022 for the same as before.

  
Reader

21.06.2021

Counsel for the appellant present. Preliminary arguments heard.

Points raised need consideration. The appeal is admitted to regular 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 of the receipt of notices positively. If the written reply/comments are not submitted within the stipulated time, the office is directed to submit the file with a report of non-compliance. File to come up for arguments on 08.11.2021 before the D.B.

Appellant Deposited  
Security & Process Fee

21/6

  
Chairman



BEFORE THE HONOURABLE KP SERVICE TRIBUNAL  
PESHAWAR.

4928  
SERVICE APPEAL NO. \_\_\_\_\_/2021.

**Amin Ul Haq** (Drawing Master)

Appellant

Versus


Government of Khyber Pakhtunkhwa & others

Respondents

I N D E X

| S.No | Description of Documents              | Annex | Page No |
|------|---------------------------------------|-------|---------|
| 1.   | Grounds of Appeal                     |       | 1-3     |
| 2.   | Copy of Appointment Order             | A     | 4-6     |
| 3.   | Copy of Service Book                  | B     | 7-10    |
| 4.   | Copy of impugned Order dt: 07-12-2020 | C     | 11-13   |
| 5.   | Copy of Departmental Appeal           | D     | 14      |
| 6.   | Wakalatnama                           |       | 15      |

Dated. 27 /4/2021.

  
IBADUR RAHMAN  
Advocate High Court  
127-Sarhad Mansio  
Hashtnagri, GT Road  
Peshawar.  
Mob No. 0300-5932939

(1)

BEFORE THE HONOURABLE KP SERVICE TRIBUNAL  
PESHAWAR.

SERVICE APPEAL NO. \_\_\_\_\_/2021

Amin Ul Haq (Drawing Master) S/o. Abdullah Jan  
Government High School Naraza, Distt: Bajawar.

Appellant

Versus

- 1- Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Peshawar.
- 2- Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
- 3- Deputy Director (Estab:) Merged Districts, GT Road Peshawar.
- 4- District Education Officer, (Previously Agency Education Officer) District Bajawar at Khar.
- 5- Fazal Qadar, SDM, through DEO Bajaur at Khar.
- 6- Sher Muhammad SDM, through DEO Bajaur at Khar.

Respondents

APPEAL U/S 4 OF KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL ACT AGAINST THE ORDER/NOTIFICATION  
ENDST: NO. 6269-66 DATED 07.12.2020 ISSUED BY  
RESPONDENT NO.3 AGAINST WHICH THE  
APPELLANT FILED DEPARTMENTAL APPEAL DATED  
04-01-2021 BUT THE SAME HAS NOT YET BEEN  
DECIDED.

Respectfully sheweth.

Appellant submits as under :-



- 1- That being fully qualified and after fulfillment of the requisite formalities as well as on the recommendations of the Departmental Selection Committee, the appellant was appointed as Drawing Master (BPS-9) vide order dated 09-09-1989 whereas the respondent No.5 & 6 were appointed in April, 1992. (Annex:- A).
- 2- That the appellant was allowed BPS-15 on account of upgradation vide Govt: of Khyber Pakhtunkhwa (E&SE) Deptt: Peshawar No. (B&A)1-18/E&SE/2012 dated 11/7/2012 Endorsed by DE FATA No. 20551-70 dated 25/11/2013 and duly circulated by the Agency Education Officer Bajawar vide No. 955-60 dated 12/3/2014. (copy of service book attached as **annex: B**)
- 3- That since then the appellant is performing her duties to the best of her abilities and to the entire satisfaction of her superiors.
- 4- That as per government policy the post of Drawing Master (DM) was upgraded from BPS-15 to BPS-16, therefore, the appellant being the Senior Most, was hopeful that the appellant would be promoted to the post of BPS-16 but the appellant was shocked to see that the Department has issued promotion order of the Respondent No.5 & 6 vide Notification dated 07-12-2020 (impugned herein) and the appellant has totally been ignored. (Annex:-C)
- 5- That being aggrieved by the above said impugned Notification of dated 07-12-2020, the appellant preferred a departmental appeal on 04-01-2021 but still no response from their side. (Kindly peruse Annex:-D).
- 6- That the appellant being aggrieved and finding no other adequate remedy the appellant has left with no option but to approach this honourable tribunal on the following ground amongst others :-



**GROUND:**

- i. That the Act of the respondents is harsh, unjustified and without lawful authority.
- ii. That the junior most colleague of the appellant has been promoted/upgraded to BPS-16 but strange enough that the appellant has not been promoted to BPS-16, which is totally unjustified.
- iii. That the appellant has been penalized for no fault on the part of the appellant.

- iv. That the appellant is duly eligible to be promoted when her other colleagues were promoted but the appellant was totally ignored.
- v. That the appellant has badly been discriminated therefore, the act of the respondents is against the fundamental rights of the appellant enshrined in the Constitution of Pakistan.
- vi. That the act/conduct of the respondents towards the appellant is totally unjustified, illegal, void ab initio and without lawful authority.
- vii. That the appellant has been deprived from his legitimate right of promotion.
- viii. That the appellant be allowed to add any other ground at the time of arguments.

It is therefore humbly prayed on acceptance of instant appeal the impugned Notification dated 07/12/2020 to the extent of Respondent No. 5 &6, be set a side and the respondents be directed to promote the appellate to BPS-16 from the date when his juniors were promoted.

Any other remedy deem proper in the matter and not specifically asked for may also please be given with cost.

  
 APPELLANT  
 Through:   
 IBADUR RAHMAN,  
 Advocate High Cour  
 127-Sarhad Mansion  
 Hashtnagri, GT Road  
 Peshawar.

Dated, 27 /4-2021.

AFFIDAVIT.

Stated on oath that the above contents are true and correct to the best of my knowledge and belief.

  
 DEPONENT

ADJUSTMENT/  
APPOINTMENT

Consequent upon the completion of Drg:Master course this year the following Drg:Masters trainees are adjusted/appointed temporarily on Rs. 8347-PM fixed plus usual allowances as admissible under the rules with effect from the dates of their taking over charge in the schools noted against their names. The candidates will be placed in regular scale from the date of declaration of the result.

| SNo. | Name/Father Name                          | School where posted                      | Remarks                                     |
|------|---|--|---|
| 1.   | Qaimullah Khan, S/O<br>Mir Qalam Khan.    | GHS. Paya, FR, Kohat.                    | Against the vacant of D/master.             |
| 2.   | Jan Alam, S/O<br>Toor Khan.               | GMS. Nanashkor,<br>(Mohmand Agency).     | Against the newly created of D/Master post. |
| 3.   | Gul Rehman, S/O<br>Khaista Rehman.        | GMS. Akhun Zadagan,<br>(Mohmand Agency). | --do--                                      |
| 4.   | Rashid Ullah, S/O<br>Ghulam Qadir.        | GMS. Bazeed Khel,<br>(Orakzai Agency).   | Against the vacant D/Master post.           |
| 5.   | Aminul Haq, S/O<br>Abdullah Jan.          | GHS, Inayat Killa,<br>(Bajour Agency).   | Against the vacant D/master post.           |
| 6.   | Mohammad Bashir, S/O<br>H. Abdul Hamid.   | GHS. Ashkar Kot,<br>(S.W. Agency).       | --do--                                      |
| 7.   | Barkat Ullah, S/O<br>Khoon Janan.         | GMS. Chaper Mashti,<br>(Orakzai Agency). | --do--                                      |
| 8.   | Mohammad Ghulam.                          | GMS. Khar Lachi,<br>(Kurram Agency).     | Against the newly created of D/master post. |
| 9.   | Rafiq Hussain, S/O<br>Yousaf Hussain.     | GHS. Shingak,<br>(Kurram Agency).        | --do--                                      |
| 10.  | Javid Said, S/O<br>Jan Said.              | GHS. Jan Khan Killi,<br>(Khyber Agency). | --do--                                      |
| 11.  | Banat Khan, S/O<br>Khail Hassan.          | GMS. Sama Badabir,<br>(FR. Peshawar).    | --do--                                      |
| 12.  | Sheer Afzal Khan, S/O<br>Sher Zaman Khan. | GHS. Turki Ismail<br>Khel (FR. Kohat).   | --do--                                      |
| 13.  | Nasrat Ullah, S/O<br>Mir Qasim Khan.      | GMS. Kozi Merkot,<br>(S.W. Agency).      | Against the newly create of D/Master post.  |
| 14.  | Asmat Ullah Khan, S/O<br>Nagibullah Khan. | GMS. Shah Ibrahim,<br>(Kurram Agency).   | Against the vacant of D/Master post.        |
| 15.  | Yar Mohammad, S/O<br>Faiz Talab Khan.     | GMS. Baro Killi,<br>(Bajour Agency).     | Against the newly created of D/Master post. |
| 16.  | Noor Jan, S/O<br>Muhib Ali.               | GHS. Angori,<br>(Kurram Agency).         | Against the Vacant post of D/Master.        |
| 17.  | Said Nawaz, S/O<br>Shah Nawaz Khan.       | GMS. Azam Worsak,<br>(S.W. Agency).      | Against the newly create of D/Master post.  |

next page... 2

*[Signature]*  
Head Master  
GHS Dherakai  
Bajaur Agency

*[Signature]*  
Assistant Sub-Divisional  
Education Officer  
Bajaur District

5

next page 2

- |   |  |   |
|---|--|---|
| 18. Bakhtiar Said, S/O<br>Bakhtoor Said.        | GMS. Wacha Khura                                     | Against the<br>vacant of D/Master<br>post.        |
| 19. Subz Ali Khan, S/O<br>Gul Rehman.           | GMS. Shalober No.<br>(Khyber Agency).                | Against the<br>newly created of<br>D/Master post. |
| 20. Sahar Gul, S/O<br>Mir Khatim.               | GMS. Abdul Ghafoor<br>Khan Killi (Khyber<br>Agency). | Against the<br>vacant D/Master<br>post.           |
| 21. Fazal Akber, S/O<br>Toor Khan.              | GMS. Hissara Bara<br>(Khyber Agency).                | Against the<br>newly create of<br>D/Master post.  |
| 22. Sharif Noor, S/O<br>Gul Ahmad Khan.         | GMS. Daran<br>(Brakzal Agency).                      | Against the<br>vacant D/Master<br>post.           |
| 23. Mohammad Tayab Khan, S/O<br>H. Bahrai Aman. | GHS. Dara Adam<br>Khal (FR. Kohat).                  | Against the<br>D/Master post.                     |
| 24. Fazle Mahood, S/O<br>Gul Zada.              | GMS. Akram Killi,<br>(Khy: Agency).                  | Against the<br>newly created of<br>D/Master post. |
| 25. Shakir Ullah, S/O<br>Gul Amin Jan.          | GHS. Zoor Bander<br>(Bajour Agency).                 | Against the<br>vacant D/Master<br>post.           |
| 26. Shah Khan, S/O<br>Said Mohammad.            | GMS. Shinkot,<br>(Bajour Agency).                    | Against the<br>newly created of<br>D/Master post. |
| 27. Asghar Ali Shah, S/O<br>Gulzamin Shah.      | GHS. Zadrana,<br>(S.W. Agency).                      | Against the<br>vacant D/Master<br>post.           |

- Notes:-
1. Charge reports should be submitted to all concerned.
  2. Their appointment are being made purely on temporarily basis and are liable to termination at any time without notice & without assigning reason. In case they wishes to resign their posts they shall have to give one months prior notice or forfeit one month pay in lieu thereof. Their services will be terminated if they are not selected by the Selection Committee.
  3. The Original Qualification, date of birth & domicile certificate should be got checked before they are handed over charge of the post and attested copies thereof be kept on the record of school.
  4. TA/DA etc is not allowed on first appointment.
  5. They should be sent to the Agency Civil Surgeon concerned for M/Examination the day on which they report their arrival for duty and no pay should be drawn for them unless & until they produce their Health and age Certificate from the said Surgeon.
  6. Their verification roll of character and antecedents should be got completed and verified from the Authorities concerned.
  7. The pay scale & service rules would be subject to revision in accordance with the orders to be passed by the Govt. of NWFP from time to time.
  8. They should not handed over charge of the post if they are below 18 or above (30) years of age. If they fail to resume charge within two weeks their vacancies should be reported to this office.
  9. ATONCE. The candidat's should report their arrival to the concerned schools after 8.9.1989.

*Attested*

1000-1000-1000

1000-1000-1000

Copy forwarded for information and necessary action to the:-

6

1. Agency Education Officer (Kurram Agency at Parachinar).
2. " " " (SWA&FR D.I.Khan).
3. " " " (Orakzai Agency & FR. Kohat).
4. " " " (Khyber Agency & FR. Peshawar).
5. " " " (Mohmand Agency at Ghallani).
6. " " " (Bajour Agency at Khan).
7. Headmaster Govt: High School, (Dara Adam Khel FR. Kohat).
8. " " " " (Zohr Bander Bajour Agency).
9. " " " " (Zadrana (SWA).
10. " " " " (Paya (FR. Kohat).
11. " " " " (Ashkar Kot (SWA).
12. " " " " (Shingak (Kurram Agency).
13. " " " " (Jan Khan Killi Khyber Ag:).
14. " " " " (Turki Ismail Khel (FR. Kohat).
15. " " " " (Angori (Kurram Agency).
16. PA to Director of Education (FATA) NWFP, Peshawar.
- 17-43. Candidate Concerned.

By: Director of Education,  
(FATA) N.W.F.P. Peshawar.

17/9

H. Din.

*Mustafiz*

*MW*

Assistant Educational Officer  
Tribal District Bajaur

(For use in Police Department only).

Annex: B

Heirs,

- 1.
- 2.
- 3.

Verification Roll No. dated received from

Left thumb-impression.

⑤ passed BA Examination under R/No-AB431475-From A.I.O.U. Islamabad marks obtained 534/900 Result Declared on - 26/11/2013 - *Amir*

Head Master  
GHS DHERAKAI  
Bajaur Agency

|   |      |   |
|---|------|---|
| Qualification   | Date | Qualifications  |
| 1) passed SSC (A) Exam English in 1981 under R.No 14621 from the BISE, Pesh.                  |      | 4, Attended Pakistan Drawing Training in 1988-89 from the Govt. Element College Jussak Peshawar Agency                                      |
| 2) Passed of Intermediate Urdu in 1985 under R.No 14955 from the BISE, Pesh.                  |      | E. of B. A. Pleadership examination   |
| Plan-drawing  |      | Training School Final examination <i>Amir</i>   |
| Finger print  |      | Other qualifications  |
| 3) Passed Art: Adol. Court duties from the BISE, Pesh. under R.No 48280, in 1987, <i>Amir</i> |      | 6) Passed DSI Examination from P.D.E. under Dep. Peshawar under Roll No 629 held in 1993, marks obtained 84/100 Result declared on 25/12/19 |

*Amir*

Head Master  
GHS Dherakai  
Bajaur Agency

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

Note:—The entries in this page should be renewed or re-attested at least every five years and the signature (lines 9 and 10) should be dated.

1. Name *Amin-ul-Haq*

2. Race *Afghan*

3. Residence *village Tabai Salazai at Khaw Payer Agency*

4. Father's name and residence *Abdullah Jan*

5. Date of birth by Christian era as nearly as can be ascertained *10-4-1962*  
*6 tenth April N/A Sixty Two*

6. Exact height by measurement *5 feet 6*

7. Personal marks for identification *wound marks on fingers*

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

Little Finger. Ring Finger

Middle Finger. Fore Finger

Thumb.

~~Signature~~

9. Signature of Government servant. *A*  
*Attested*

10. Signature and designation of the Head of the Office, or other Attesting Officer. *Mirza U*

N/A

| 9   | 10   | 11   | 12  | 13   |   | 14  | 15  |
|---|--|--|---|--|---|---|---|
| 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            | 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 |   |   |
| Period  |  |  |   |  | Government to which debitable   |   |   |
| <p>Approved<br/>Head Master<br/>G.H.S. DHERAKAI<br/>Bajaur Agency.</p>  | <p>30/6/2011</p>   |  | <p>Approved<br/>Head Master<br/>G.H.S. DHERAKAI<br/>Bajaur Agency.</p>    |  |   |   |   |
| <p>Approved<br/>Head Master<br/>G.H.S. DHERAKAI<br/>Bajaur Agency.</p>  | <p>30/11/2011</p>  |  | <p>Approved<br/>Head Master<br/>G.H.S. DHERAKAI<br/>Bajaur Agency.</p>    |  |   | <p>pay Revised vide Finance<br/>Division (Regulations wing)</p>                                       |   |
| <p>Approved<br/>Head Master<br/>G.H.S. DHERAKAI<br/>Bajaur Agency.</p>  | <p>30/11/2011</p>  |  | <p>Approved<br/>Head Master<br/>G.H.S. DHERAKAI<br/>Bajaur Agency.</p>    |  |   | <p>NO-F-1(S) Imp. / 2011-419 -<br/>Islamabad - the 4th July 2011</p>                                  |   |
| <p>Approved<br/>Head Master<br/>G.H.S. DHERAKAI<br/>Bajaur Agency.</p>  | <p>30/11/2013</p>  |  | <p>Approved<br/>Head Master<br/>Govt. High School<br/>Dherakai Bajaur</p> |  |   | <p>Approved<br/>HEAD MASTER<br/>G.H.S. DHERAKAI<br/>Bajaur Agency.</p>                                |   |
| <p>Approved<br/>Head Master<br/>Govt. High School<br/>Dherakai Bajaur</p>                                       | <p>T-63<br/>12-5-04.</p>   |  | <p>Approved<br/>Head Master<br/>Govt. High School<br/>Dherakai Bajaur</p> |  |   | <p>Service verified w/e/f from 1/1/2010<br/>to 30/11/2011 in the school<br/>T.No 24<br/>11-3-2015</p> | <p>Approved<br/>Head Master<br/>Govt. High School<br/>Dherakai Bajaur</p>                       |
| <p>Approved<br/>Head Master<br/>Govt. High School<br/>Dherakai Bajaur</p>                                       | <p>30/11/2014</p>  | <p>Allowed<br/>on pms</p>  | <p>B. Lado<br/>Head Master<br/>Govt. High School<br/>Dherakai Bajaur</p>  |  | <p>on No of L.P.S. date from B.P.S. 9603-15<br/>with pms allowances -</p>   | <p>Service verified w/e/f 1/12/2011<br/>to 30/11/2013 in the school.</p>                              | <p>AAO</p>  |
| <p>B. Lado<br/>Head Master<br/>Govt. High School<br/>Dherakai Bajaur</p>  | <p>30/11/2014</p>  | <p>Allowed<br/>on pms</p>  | <p>B. Lado<br/>Head Master<br/>Govt. High School<br/>Dherakai Bajaur</p>  |  |   | <p>Service verified w/e/f 1/12/2011<br/>to 30/11/2013 in the school.</p>                              | <p>AAO</p>  |
| <p>B. Lado<br/>Head Master<br/>Govt. High School<br/>Dherakai Bajaur</p>  | <p>Non refundable<br/>Advance<br/>Drawn Rs. 10000/-<br/>T.No. 137<br/>23/02/2015</p> | <p>Allowed<br/>on pms</p>  | <p>B. Lado<br/>Head Master<br/>Govt. High School<br/>Dherakai Bajaur</p>  | <p>Allowed B-1561 A/c upgraded<br/>vide Govt. KPK (L.S.D.E) Deptt. Order<br/>No. 506 (B.S.A)-18/1855/2012 dated 11-7-2012 -<br/>Emdtd. by DE (P.A.P.A) No: 20551-70 dated<br/>25/11/2013. A.A.O. Bajaur No: 955-80<br/>dated, 12, 3, 2014.</p> |   | <p>Approved<br/>Head Master<br/>Govt. High School<br/>Dherakai Bajaur</p>                             | <p>AAO</p>  |
| <p>Attested</p>   |  |  | <p>Approved<br/>Head Master<br/>Govt. High School<br/>Dherakai Bajaur</p> |  | <p>Allowed on pms vide<br/>Govt. of KPK Finance Deptt. No: FD(SO.SR-1)<br/>2/123/2014 dt. 20/5/04.</p>                  | <p>Approved<br/>Head Master<br/>Govt. High School<br/>Dherakai Bajaur</p>                             | <p>B. Lado<br/>Head Master<br/>Govt. High School</p>  |





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

Annex - C

**Notification**

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Male CTs/DMs/Ats/ & TTs (BPS-15) are hereby promoted to the post of Senior CT/Senior DM/Senior At/ & Senior TT (BPS-16) (Rs. 18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the vacant the post of Senior CT/Senior DM/Senior At/Senior TT & Senior PET (BPS-16) posts.

**1. CT to Senior CTs (BPS-16)**

| S. No. | S.L. No. | Name of Official | Present Place of Posting | Date of Birth | Date of Apptt; as Regular CT | Remarks   |
|--------|----------|------------------|--------------------------|---------------|------------------------------|---|
| 1      | 5        | Gul Munir        | GHS Sahib Abad           | 24/4/1974     | 1/11/2003                    | Services placed at the disposal of DEO Bajaur for further posting |
| 2      | 7        | Gul Rahim        | GMS Zagai                | 5/3/1965      | 16/11/2003                   | -do-  |
| 3      | 8        | Fazal Manan      | GHS Shinger Gul          | 2/5/1966      | 1/12/2006                    | -do-  |
| 4      | 9        | Sher Khan        | GHS Hakaki Charmang      | 13/1/1965     | 24/11/2004                   | -do-  |
| 5      | 10       | Muhammad Iqbal   | GHS Ghani Adai           | 9/7/1969      | 24/11/2004                   | -do-  |
| 6      | 11       | Ahmad Jan        | GHS Khar                 | 3/11/1976     | 24/11/2004                   | -do-  |
| 7      | 12       | Sahib Ul Islam.  | GHS Batawar              | 1/3/1966      | 24/11/200                    | -do-  |
| 8      | 13       | Abdul Zahir      | GHS Tang Khatta          | 1/4/1976      | 24/11/2004                   | -do-  |
| 9      | 14       | Naseeb Jan       | GHS Ghazi Baba           | 3/2/1968      | 24/11/2004                   | -do-  |
| 10     | 15       | Sajad Rehman Ur  | GMS Chingai              | 17/3/1980     | 24/11/2004                   | -do-  |
| 11     | 17       | Aziz Ul Haq      | GHS Matta Qilla          | 20/5/1970     | 26/11/2004                   | -do-  |
| 12     | 18       | Muhammad Jameel  | GHS Shagoo               | 7/3/1978      | 17/12/2005                   | -do-  |
| 13     | 20       | Muhammad Latif   | GMS Chingai              | 20/11/1975    | 17/12/2005                   | -do-  |
| 14     | 21       | Ghulam Hussain   | GHS Ghani Adai           | 7/2/1966      | 17/12/2005                   | -do-  |
| 15     | 22       | Ghulam Muhammad  | GHS Inayat Qilla         | 2/2/1969      | 12/4/2007                    | -do-  |
| 16     | 23       | Abdul Matin      | GMS Zagai                | 5/4/1972      | 12/4/2007                    | -do-  |

Asst. District Education Officer  
Bajaur District

**Promotion order of Senior Teachers (M) Bajaur 2**

(12)

|    |    |                    |                     |           |           |      |
|----|----|--------------------|---------------------|-----------|-----------|------|
| 17 | 24 | Muslim Khan        | GHS Inayat Qilla    | 18/1/1969 | 12/4/2007 | -do- |
| 18 | 26 | Taj Muhammad       | GMS Murdarra        | 5/4/1974  | 12/4/2007 | -do- |
| 19 | 27 | Muhammad Saeed Jan | GHSS Garadi         | 20/4/1973 | 12/4/2007 | -do- |
| 20 | 28 | Fazal Rehman       | GHS Barkhalzoo      | 2/1/1971  | 12/4/2007 | -do- |
| 21 | 29 | Badam Khan         | GHS Badan           | 1/1/1970  | 12/4/2007 | -do- |
| 22 | 30 | Abdus Samad        | GHS Badan           | 2/3/1974  | 12/4/2007 | -do- |
| 23 | 31 | Muhammad Yousaf    | GHS Charmang Halaki | 9/1/1964  | 12/4/2007 | -do- |

**2. DM to Senior DMs (BPS-16)**

| S. No. | S.L. No. | Name of Official | Present Place of Posting | Date of Birth | Date of Apptt; as Regular DM | Remarks   |
|--------|----------|------------------|--------------------------|---------------|------------------------------|---|
| 1      | 3        | Fazal Qadar      | GMS Chingai              | 2/3/1967      | 22/11/1992                   | Services placed at the disposal of DEO Bajaur for further posting |
| 2      | 4        | Sher Muhammad    | GMS Bado                 | 12/10/1963    | 25/11/2013                   | -do-  |

**3. AT to Senior ATs (BPS-16)**

| S. No. | S.L. No. | Name of Official       | Present Place of Posting | Date of Birth | Date of Apptt; as Regular AT | Remarks   |
|--------|----------|------------------------|--------------------------|---------------|------------------------------|---|
| 1      | 11       | Muhammad Hussain       | GHS Sahib Abad           | 01/06/1985    | 24/05/2013                   | Services placed at the disposal of DEO Bajaur for further posting |
| 2      | 12       | Said Muhammad Ibrahimi | GMS Sher Amin Korrana    | 20/04/1982    | 24/05/2013                   | -do-  |
| 3      | 13       | Wahib Ullah            | GLMS Kulala              | 1/04/1986     | 24/5/2013                    | -do-  |
| 4      | 14       | Atta Ur Rehman         | GHS Inayat Killi         | 10/04/1982    | 24/5/2013                    | -do-  |
| 5      | 15       | Shabir Ahmad           | GHS Shingar Gul          | 1/3/1985      | 24/05/2013                   | -do-  |

**4. TT to Senior TTs (BPS-16)**

| S. No | S.L. No. | Name of Official | Present place of posting | Date of Birth | Date of apt; as regular TT | Remarks  |
|-------|----------|------------------|--------------------------|---------------|----------------------------|--|
| 1     | 59       | Aman Ullah       | GPS Chargo               | 8/8/1978      | 1/8/2001                   | Services placed at the disposal of DEO Bajaur for further posting  |
| 2     | 66       | Muhammad Tahir   | GPS Maina No.2           | 12/01/1980    | 1/11/2003                  | -do-   |
| 3     | 132      | Rahman Ud Din    | GPS Dandokai             | 21/02/1969    | 24/11/2004                 | His promotion order from TT to STT (BS-16) issued vide Notification No.2263-68 Dated 24/2/2020 is hereby withdrawn and |



حکومت پنجاب ڈائریکٹر ایجوکیشن و سائنس اور ٹیکنالوجی

Annex: D عنوان

دفعہ 105(1) کے تحت

سورجیہ نواز شمس بھائی میں نہ میں نے DM اپنا ڈیوٹی کو اٹھانے یا ان کے  
سنگول ناراضہ علاج باجوڑ میں سرانجام دے دیا بیوں اور سر اقبال جرن  
DM آرڈر 9/1989 میں ہوا ہے اور باقودہ DM ٹریٹمنٹ (1993) میں  
بیوں نے اپنی طرف سے اس بار اس سینارائی میں سرے صف تلفی بیوں اور  
سرے صف جونیئر D.M. شمس بھائی کے لئے کو ترقی دے دی ہے  
اس لئے میں اپنی خدمت میں سر جس ٹرٹا بیوں اور آپ کے ساتھ  
سر بھائی کے لئے مجھے اپنا صف دلوای اور سر موٹو شمس افسانہ بھادر  
سر ماویں

توغین نواز شمس بیوں

القاری

اپنا علاج = آئین الحق ولد جسور الحق بھائی

DM کو اٹھانے یا سنگول ناراضہ علاج باجوڑ

Date - 4/1/2021

DD(M) Time bound case.  
Ask for report from DEO with cogent  
justifications if the same is not  
convincing, we may probe the issue.

Shw  
4/1/21

A  
Attested

# بعدالت سروس ٹریبونل لہسار

Service Appeal No 12021

Appellant 2 مخجاب

بنام گورنمنٹ آف KPR رحیم الحق

مورخہ  
مقدمہ  
دعویٰ  
جرم

## باعث تحریر آنک

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ کرکس  
آن مقام لہسار کیلئے عبدالرحمن و عمران خان محمد ایدو کرکس  
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ  
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے وہ ہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المقوم 26 ماہ ابریل 2021

واہ الع

بمقام لہسار کے لئے منظور ہے۔

Appellant: