

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

S. A. No. 236 /2022

Aman Ullah

versus

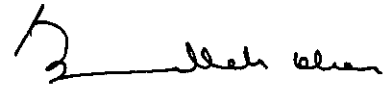
Secretary & Others

I N D E X

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R. No. 03

Through



(Saadullah Khan Marwat)
Advocate
21-A Nasir Mension,
Shoba Bazar, Peshawar.
Ph: 0300-5872676

Dated: 15-05-2023

BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR

S. A. No. 236 /2022

Aman Ullah

versus

Secretary & Others

WRITTEN STATEMENT ON BEHALF OF
R. NO. 03 (IHSAN ULLAH)

Respectfully Sheweth,

Preliminary Objections:

- a. That the hon'ble Tribunal has no jurisdiction in the matter.
- b. That appointment is not a vested right to be claimed.
- c. That R. No. 03 was not associated with the enquiry proceedings.
- d. That the appeal is meritless.

ON FACTS

1. Not correct. The para is without proof regarding advertisement and proceedings of Departmental Selection Committee and its recommendations of appellant for the purpose.
2. Not correct. Appellant cannot claim double facility of open merit as well as retired son quota.
3. Para No. 03 does not pertain to R. No. 03.
4. Correct.
5. Not supported by proof.
6. Appellant was not appointed as per the mandate of law.
7. Does not relate to R. No. 03.
8. As above.
9. Not correct. No impartial enquiry was ever conducted. Relevant / concerned ~~persons~~ not participated in the same.


- 10-11. As per Para No. 7 above.
- 12-13. Correct.
14. In response to this para, it is submitted that the hon'ble Tribunal, if agreed, remit the matter to authority for final decision a fresh to get rid of the matter and to settle the issue once for all.

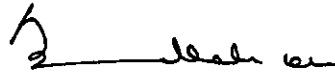
GROUND:


- a. Not correct. The position has explained in the facts above.
- b. Not correct. Only R. No. 03 was recommended as is evident from the attached document.
- c. Not correct. R. No. 03 participated the whole run.
- d. Not correct. From the available record, it is quite clear as to whether appointment of appellant was on open merit or retired son quota.
- e. Not the authority has acted as per law.
- f. Not correct. No political interference was ever exerted
- g. Allowed.

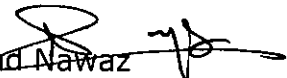
It is, therefore, most humbly requested that the appeal of appellant, being without substance, merit and law be dismissed with cost in the interest of justice.

Through


R. No. 03


Saadullah Khan Marwat


Arbab Siaf-ul-Kamal


Amjad Nawaz
Advocates,

Dated: 15-05-2023

VERIFICATION

I, **Ihsan Ullah**, R. No. 03 do hereby verify that contents of the **Written Statement** are true and correct to the best of my knowledge and belief.


DEPONENT

B

**MINUTES OF THE MEETING OF DISTRICT SELECTION COMMITTEE REGARDING RECRUITMENT OF RETIRED
SONS AND FRESH CANDIDATES AS A CLASS IV AT THE OFFICE OF THE DISTRICT EDUCATION OFFICER
MOHMAND TRIBAL DISTRICT**

HELD ON 22-01-2021

The District Selection Committee meeting regarding recruitment of various categories in **Retired Sons and Fresh Candidates**, as Class IVs Held On 22-1-2021 In the Office of District Education Officer Mohmand under the Chairmanship of DEO Mohmand.

The following attended the meeting.

S#	Name & Designation	Capacity
1.	Mr. Noor Hassan Khan District Education Officer Mohmand Tribal District	Chairman
2	Mr. Muhammad Sultan Khan Principal GHSS Ghallanai	Member
3	Mr. Hayat Khan ASDEO DEO Office Mohmand Tribal District	Member
4	Mr. Abdul Sattar HM GHS Qamar Din	Member
5	Mr. Muhammad Qayum Local Office Mohmand Tribal District	Facilitator

The meeting started with the recitation of few Aayath from the Holy Quran by Mr. Abdul Sattar HM GHS Qamar Din Mohmand.

THE CRITERIA FOR RECRUITMENT

Deceased sons' quota	100 %
Retired Employees Sons Quota	25 %
Minority Candidates	03 %
Disable Candidates	02%
Fresh Candidates	75%

The DSC members thoroughly checked all cases regarding the appointment of the above-mentioned category. The committee has unanimously given its remarks / recommendations mentioned against each candidate as shown in the following table.

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ITEM #1.-Retired Son & Fresh Candidates (D.S.C-22-1-2021)

S.No	Name	Father Name	Remarks
1	Aman ullah	Nishan Khan	Dispute Subject to Verification
2	Nabila	Abdul Samad	Recommended subject to verification
3	Adnan Khan	Mukaram Khan	Recommended but verification required
4	Shazar Khan	Tahir Khan	Recommended
5	Nawaz Khan	Khan Badshah	Recommended
6	Mustafa Jan	Munsif Khan	Recommended
7	Ubaid Ullah	Israr Khan	Recommended subject to verification
8	Zia Ullah	Gul Khan	Recommended
9	Basida Bibi	Malik Misal Khan	Recommended
10	Alamgir	Aurang Zeb	Recommended
11	Muhammad Afzal Safi	Azeem Khan	Recommended
12	Nadeem Khan	Azeem Khan	Recommended
13	Mir Salam	Feroz Khan	Recommended
14	Muhammad Shafi	Abdur Rehman	Recommended subject to CNIC Provision

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Approved

15	Ahmad Khan	Nadir Khan	Recommended
16	Sajad Ahmad	Ajmal Khan	Recommended
17	Sail Ahmad	Irshad Ahmad	Recommended
18	Iftikhar Ahmad	Jamal	Recommended
19	Asif Khan	Jan Muhammad	Recommended
20	Jehangir	Mian Khan	Recommended subject to verification
21	Hazrat Husain	Abdur Rehman	Recommended
22	Amar Din	Fazal din	Recommended
23	Aman ullah	Fazle Mula	Recommended
24	Umee Habiba	Zabih Ullah	Recommended
25	Yaqoob Khan	Zaheer Ullah	Recommended
26	Afaq Ahmad	Hikmat Sher	Recommended
27	Muhammad Bilal	Abdus Sattar	Recommended
28	Mudasir	Noor Shali	Recommended
29	Fazli Hadi	Malang Jan	Recommended
30	Habib Ullah	Farooq	Recommended
31	Muhammad Waseem	Dost Muhammad	Recommended

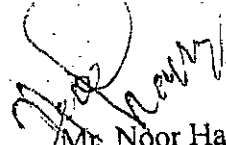
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32	Najeeb Ullah	Bakht Zareen	Recommended subject to verification
33	Salman Khan	Javid Iqbal	Recommended
34	Mushtaq	Gul Alam	Recommended
35	Raheem Shah	Arabi shah	Recommended
36	Zia Ul Haq	Khan Mir	Recommended
37	Muhammad Ali	Wairs Khan	Recommended
38	Muhammad Arif	Hassan Jan	Recommended
39	Bakhtawar Khan	Anwar Khan	Recommended
40	Janas Khan	Hamza Khan	Recommended
41	Suliman Shah	Zaiwar Shah	Recommended
42	Adnan Khan	Nadar Khan	Recommended
43	Muhammad Essa	Abdul Mateen	Recommended
44	Jan Muhammad	Said Khan	Recommended
45	fazli Wahid	Muhammad Ayub Khan	Recommended
46	Ihsan Ullah	Pati Khan	Dispute Subject to verification
47	Waseem	Kashir Gul	Dispute Subject to verification
48	Bilal	Malang Jan	dying cadre verification required

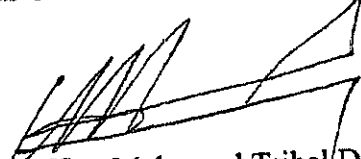
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Mr. Noor Hassan Khan
District Education Officer Mohmand Tribal District.
(Chairman)


Mr. Muhammad Sultan Khan principal GHSS Ghallanai (Member)


Mr. Abdul Sattar HM GHS Qamar Din (Member)


Mr. Hayat Khan ASDEO DEO Office Mohmand Tribal District (Member)


Mr. Muhammad Qayum S/C DEO Office Mohmand Tribal District (Facilitator)

