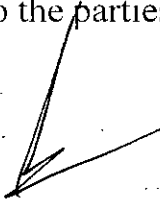



10.04.2023

Learned counsel for the appellant present. Mr. Fazal Shah Mohmand, Additional Advocate General for the respondents present.

Learned counsel for the appellant wants to produce the appellant in person. He is directed to produce the appellant on or before the next date. Adjourned. To come up on 31.05.2023 before D.B. Parcha Peshi given to the parties.

SCANNED  
10/04/23  
Peshawar


  
(Muhammad Akbar Khan)  
Member (E)

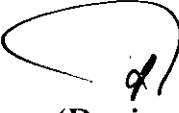
  
(Kalim Arshad Khan)  
Chairman

18<sup>th</sup> Nov. 2022

Lawyers are on strike today.

Case is adjourned to 12.01.2023 for arguments before the DB. Office is directed to notify the next date on the notice board as well as website of the Tribunal.

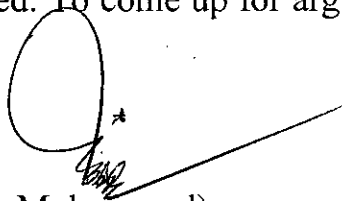
  
(Fareeha Paul)  
Member(E)


  
(Rozina Rehman)  
Member(J)

12.01.2023

Appellant in person present. Mr. Muhammad Jan, District Attorney for the respondents present.

Appellant requested for adjournment on the ground that his counsel is busy in the august Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 10.04.2023 before the D.B.

  
(Mian Muhammad)  
Member (E)


  
(Salah-Ud-Din)  
Member (J)


SCANNED  
KPSI  
PESHAWAR

21.06.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Learned counsel for the appellant sought adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments on 02.09.2022 before the D.B.


  
(Fareeha Paul)  
Member (E)

  
(Salah-ud-Din)  
Member (J)

02.09.2022

Appellant in person present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

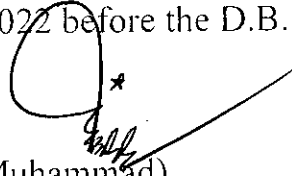
Learned Member (Judicial) Ms. Rozina Rehman is on leave, therefore, arguments could not be heard. Adjourned. To come up arguments on 17.10.2022 before the D.B.


  
(Salah-Ud-Din)  
Member (Judicial)

17.10.2022

Appellant in person present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Appellant requested for adjournment on the ground that his counsel is out of station today. Adjourned. To come up for arguments on 18.11.2022 before the D.B.

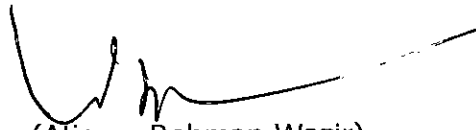
  
(Mian Muhammad)  
Member (E)

  
(Salah-Ud-Din)  
Member (J)

12.01.2022

Learned Counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

Learned counsel for the appellant requests for adjournment. Request accorded. To come up for arguments on 29.04.2022 before the D.B.

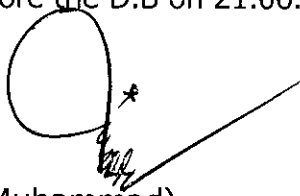
  
(Atiq-ur-Rehman Wazir)  
Member(E)

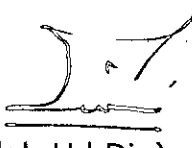
  
Chairman

29.04.2022

Appellant in person present. Mr. Kabirullah Khattak, Additional Advocate General for respondents present.

Appellant sought adjournment on the ground that his learned counsel is not available today. Adjourned. To come up for arguments before the D.B on 21.06.2022.

  
(Mian Muhammad)  
Member(E)

  
(Salah Ud Din)  
Member(J)

17.01.2022

Learned Counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

Learned counsel for the appellant requests for adjournment. Request accorded. To come up for arguments on 29.04.2022 before the D.B.

08.02.2021

Junior counsel for appellant present.

Kabir Ullah Khattak learned Additional Advocate General alongwith Nasir ud Din Assistant and Hayat Khan A.D for respondents present.

Reply on behalf of respondent No.2 was submitted. Representative of respondent No.3 stated that respondent No.3 relies on the reply of respondent No.2. To come up for rejoinder, if any, and arguments on 24.05.2021 before D.B.

  
(Rozina Rehman)  
Member (J)

24.05.2021

Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 02.09.2021 for the same as before.

  
Reader

02.09.2021

Due to summer vacations, the case is adjourned to 12.01.2022 for the same as before.

  
READER

04.11.2020

Appellant is present in person and submitted application for depositing of security and process fee which have not been deposited within due time.

Application is allowed. The appellant is directed to deposit security and process fee within three working days from today.

Appellant Deposited  
Security & Process Fee

Thereafter, notices be issued to the respondents for submission of written reply/comments on 23.12.2020 before S.B.

(MUHAMMAD JAMAL KHAN)  
MEMBER (JUDICIAL)

23.12.2020

Appellant in person present.

Kabir Ullah Khattak learned Additional Advocate General alongwith Wahid Ali Litigation Officer and Rehman Ullah Assistant for respondents present.

Written reply was not submitted. Representatives of the respondents made a request for time to furnish reply/comments; granted. To come up for written reply/comments on 08.02.2021 before S.B.

(Rozina Rehman)  
Member (J)

20.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 14.07.2020 for the same. To come up for the same as before S.B.

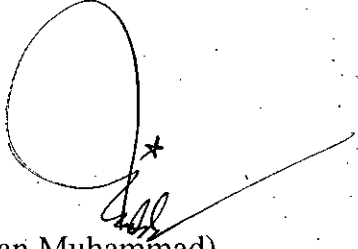
  
Reader

14.07.2020

Counsel for the appellant and Addl: AG for respondents present.

Counsel for the appellant submitted an application for extension of time to deposit security and process fee. The appellant is directed to deposit the same with a week, thereafter notice be issued to the respondents for written reply/comments.

Adjourned to 15.09.2020 before S.B.

  
(Mian Muhammad)  
Member(E)

15.09.2020

Counsel for the appellant present.

Submitted an application for extension of time to deposit security and process fee which have not been deposited within due time.

Application is allowed. The appellant is required to deposit security and process fee within three working days from today. Thereafter, notices be issued to the respondents for submission of reply/comments on 04.11.2020 before S.B.

  
Chairman

22.01.2020 Appellant present in person.

Requests for adjournment due to general strike of the Bar. Adjourned to 05.03.2020 before S.B. The appellant may furnish relevant service structure/promotion criteria on the next date of hearing.

Chairman 

05.03.2020

Counsel for the appellant Irshad Hussain present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was appointed as Subject Specialist (BPS-17) on the recommendation of Public Service Commission vide order dated 19.10.2007. It was further contended that as per appointment order/merit list dated 19.10.2017, the appellant was shown at the top of merit list. It was further contended that Sher Nawab and Syed Raza Shah was also appointed as Subject Specialist vide same order and they were shown at serial no. 22 & 23 respectively in the merit list, therefore, as per merit list, the appellant was senior than Sher Nawab and Syed Raza Shah. It was further contended that the respondent-department promoted Sher Nawab and Syed Raza Shah from BPS-17 to BPS-18 vide order dated 16.04.2015 but the appellant was ignored illegally, therefore, the appellant filed departmental appeal on 14.05.2015 but the same was not responded, therefore, the appellant filed Writ Petition which was also disposed off and the said Writ Petition was treated as representation with the direction to decide the same vide judgment dated 18.02.2019 but the respondent-department has not decided the same so far, hence, the present service appeal. Learned counsel for the appellant further contended that there is some delay in service appeal but the appellant filed condonation application and it was also contended that the limitation does not run against promotion rather as it is a continues cause of action. It was further contended that since the appellant was senior but he was ignored illegally, therefore, the appellant is entitled for promotion from due date.

The contention raised by learned counsel for the appellant need consideration. The appeal is admitted for regular hearing subject to limitation and all legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 20.04.2020 before S.B.

  
(MUHAMMAD AMIN KHAN KUNDI)  
MEMBER






Form- A

FORM OF ORDER SHEET

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

Case No.- 1562/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/11/2019 <b>SCANNED!</b> P. K. SHINWARI	<p>The appeal of Mr. Irshad Hussain presented today by Mr. Muhammad Ayub Khan Shinwari Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	19/11/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>24/12/19</u></p> <p> CHAIRMAN</p>
	24.12.2019	<p>Appellant with counsel present.</p> <p>Relevant service structure/promotion criteria is not available on file to determine that whether the appellant is seeking promotion or upgradation to BS-18 and that what is the qualification criteria for BS-18. Appellant seeks adjournment to furnish relevant service structure/promotion criteria. Adjourn. To come up for preliminary arguments on 22.01.2020 before S.B.</p> <p> Member</p>

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No 1562 /2019

Irshad Hussain versus Secty to Govt of KP (E & S) Edu Deptt & others

INDEX

Sr No	Description of document	Dated	Annex	Pg No
1.	Service Appeal and affidavit			1-4
2.	Application and affidavit			5-8
3.	Copies of certificates		A	7-9
4.	Copy of appointment order		B	10-13
5.	Copy of certificate		C	14
6.	Copy of letter		D	15
7.	Copy of order		E	16
8.	Copy of application		F	17
9.	Copy of impugned notification		G	18-30
10.	Copy of Deptt Appeal		H	31
11.	Copy of Judgment of High Court		I	32-34
12.	Copy of application		J	35
				36

Through

Appellant,

Muhammad Ayub Khan Shinwari  
Advocate Peshawar

CHAMBER

7-A, Haroon Mansion,  
Khyber Bazar, Peshawar  
Cell: (Clerk) 03219068514

/

**IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No \_\_\_\_\_/2019

Irshad Hussain S/o Ashiq Hussain,  
Subject Specialist (Statistics),  
Govt Shaheed Nadeem Hussain Higher Secondary School,  
Shalozan, Kurram Agency .....Appellant

Versus

1. Chief Secretary to Govt of KP, Peshawar
2. Secretary to Govt of KP, Elementary & Secondary Education Department,  
Peshawar
3. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa,  
Peshawar

.....Respondents

**Service Appeal under Section 4 of the Khyber  
Pakhtunkhwa Service Tribunal Act, 1974 against  
Notification dated 16-04-2015**

**Respectfully Sheweth,**

Brief but relevant facts of the case are as follows:

1. That the appellant is a bonafide resident of Parachinar, Distt Kurram and has qualified M. Sc (Statistics), Master of Education (M. Ed) and Bachelor of Education (B. Ed). (Copies of the certificates are filed herewith and annexed as **Annex-A**)
2. That consequent upon the recommendation of the KP Public Service Commission, the appellant was appointed as Subject Specialist (Statistics) by the competent authority vide Notification dated 19-10-2007. Ever since his appointment, the appellant has served the Department to the entire satisfaction of his superiors and has been awarded excellent performance certificate. (Copy of the appointment order and certificate is filed herewith and annexed as **Annex-B & C**)

3. That at the time of appointment, verbally without any written order the appellant was given three years time to qualify B. Ed within three years i.e., upto 2010. But due to the law and order situation in FATA, the appellant could not complete his B. Ed Degree upto 2010 and qualified the same in the year 2012. It is pertinent to mention here that due to law and order situation, the main Thall Parachinar Road was blocked in November, 2007. The road was reopened from 18<sup>th</sup> November, 2008 till 23 February, 2009 and was blocked again for traffic. The said fact is evident from the letter dated 15-07-2009 issued by the Political Agent. Furthermore due to the suspension of mobility and road blockage, the appellant was deployed to work at Govt Post Graduate College, Parachinar vide order dated 19-10-2009. Due to the said facts, the appellant qualified the B. Ed in the year 2012. The appellant approached the respondents time and again to extend the time given to him for qualifying the B. Ed keeping in view the aforesaid facts. (Copy of letter, Order and application is filed herewith and annexed as **Annex-D, E & F**)
4. That consequent upon the recommendations of Provincial Selection Board, the respondents have promoted the colleagues of the appellant vide Notification dated April 16, 2015, whereas the appellant has been deprived from promotion. (Copy of Notification is filed herewith and annexed as **Annex-G**)
5. That feeling aggrieved of the aforesaid Notification, the appellant filed Departmental Appeal but in vain. (Copy of Departmental Appeal is filed herewith and annexed as **Annex-H**)
6. That the appellant, prior to the instant Service Appeal filed Writ Petition No 530-P/2018 before the Peshawar High Court, Peshawar which was disposed off vide judgment dated 18-02-2019 with the directions to the respondents to treat the same as representation and pass an appropriate order. The appellant time and again the respondents to comply with the aforesaid directions of Honorable High Court but in vain. (Copy of Judgment is filed herewith and annexed as **Annex-I**)

Hence, the title Service Appeal on the following amongst other grounds:

**Grounds:**

- a. That, the impugned Notification whereby colleagues of the appellant have been promoted to BPS-18 and the appellant is deprived from promotion is against the law, illegal, unlawful, without lawful authority, void and ineffective upon the rights of the Appellant, thus calling interference of this Honorable Tribunal.
- b. That the Appellant is not treated in accordance with the law, rules and policy which is his inalienable right under Article 4 of the Constitution of Islamic

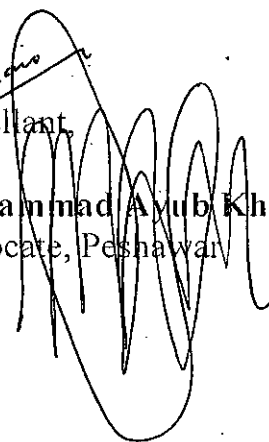
Republic of Pakistan, 1973 and also the same is against the principle of natural justice.

- c. That the respondents have promoted the colleagues of the appellant but have deprived the appellant from promotion without any cogent reason.
- d. That, the Respondents are violating all the basic Fundamental Rights and protections given to the Appellant in the Constitution of Islamic Republic of Pakistan, 1973.
- e. That the impugned Notification is against the principles of administrative law, based on colorful exercise of powers and against the dictums of the August Supreme Court of Pakistan.
- f. That the Appellant craves permission of this Honorable Tribunal to rely on other grounds at the time of arguments and produce any additional document if required in support of his Service Appeal.

It is, therefore, prayed that on acceptance of the instant service appeal, the act of respondents of not including the name of the appellant in the Notification dated 16-04-2015 be declared as unlawful, illegal, without lawful authority, void ab-initio and ineffective upon the rights of the appellant and the respondents may kindly be directed to promote the appellant to BPS-18 with effect from 16-04-2015 and include the name of the appellant in Notification dated 16-04-2015.

Any other relief which has not been specifically prayed for and deemed fit and appropriate by this Honorable Tribunal in the circumstances may graciously be granted.

Through

  
 Appellant,  
**Muhammad Ayub Khan Shinwari**  
 Advocate, Peshawar

4

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No \_\_\_\_\_/2019

Irshad Hussain versus Secty to Govt of KP (E & S) Edu Deptt & others

**Affidavit**

I, Irshad Hussain S/o Ashiq Hussain, Subject Specialist (Statistics), Govt Shaheed Nadeem Hussain Higher Secondary School, Shalozan, Kurram Agency do hereby solemnly affirm and declare on oath that the contents of the instant Appeal are true and correct to the best of my knowledge and belief and nothing is concealed from this Honorable Tribunal.

*Irshad Hussain*  
**Deponent**

5

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

C.M No \_\_\_\_\_/2019  
in  
Service Appeal No \_\_\_\_\_/2019

Irshad Hussain versus Secty to Govt of KP (E & S) Edu Deptt & others

**Application for condonation of delay in filing the title Service Appeal**

**Respectfully Sheweth,**

The Applicant submits as follows:

1. That the title Service Appeal is pending adjudication before this learned Tribunal which is fixed for hearing
2. That the law favors the decisions on merits instead of non suiting the litigants for technical reasons including on limitation.
3. That the impugned Notification is void ab-initio and subject matter of the title Service Appeal pertains to promotion and is a continuous cause of action, hence no limitation runs in such matters.
4. That the applicant seeks leave of this Honorable Tribunal to rely on other grounds at the time of arguments.

It is, therefore, prayed that on acceptance of this Application the delay in filing the title Service Appeal before this learned Tribunal may kindly be condoned and the Service Appeal be decided on merits.

Any other relief, deemed appropriate in the circumstances of the case, which is not specifically prayed for may graciously be granted.

Through

*Irshad Hussain*  
Applicant.

**Muhammad Ayub Khan Shinwari**  
Advocate Peshawar.

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

C.M No \_\_\_\_\_/2019

in

Service Appeal No \_\_\_\_\_/2019

Irshad Hussain versus Secty to Govt of KP (E & S) Edu Deptt & others

**Affidavit**

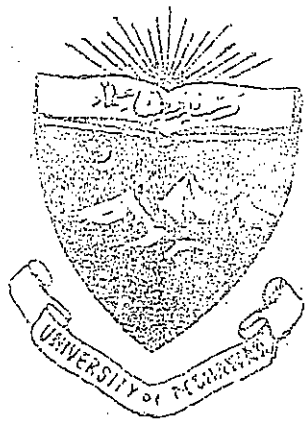
I, Irshad Hussain S/o Ashiq Hussain, Subject Specialist (Statistics), Govt Shaheed Nadeem Hussain Higher Secondary School, Shalozan, Kurram Agency do hereby solemnly affirm and declare on oath that the contents of the accompanying application are true and correct to the best of my knowledge and belief and nothing is concealed from this Honorable Tribunal.

*Irshad Hussain*

**Deponent**



Answer A 7



UNIVERSITY OF PESHAWAR  
(Pakistan)

Department of Statistics  
Master of Science (FINAL) in  
Statistics, Annual Examination 2002  
*Detailed Marks Certificate*

Name: *Irshad Hussain*

Gender: *Male* Roll No. *5227*

Father's Name: *Ashiq Hussain*

Registration No. *98-I-18235*

Papers	Maximum Marks	in Figures	Marks Obtained	
				in Words
Design and Analysis of Experiments (VI)	100	71		Seventy One
Statistical Inference (VII)	100	68		Sixty Eight
Regression Analysis and Econometrics (VIII)	100	54		Fifty Four
Multivariate Analysis (IX)	.....	.....		.....
Stochastic Processes (XI)	100	67		Sixty Seven
Data Processing & Computer Programming (XII)	100	77		Seventy Seven
PRACTICALS : Practical-I	50	35		Thirty Five
: Practical-II	50	28		Twenty Eight
M.Sc. Previous Marks	600	342		Three Hundred and Forty Two
<b>Total:</b>	<b>1200</b>	<b>742</b>		<b>Seven Hundred and Forty Two</b>

Errors and omissions are subject to subsequent rectification

The examination was passed *as a Whole* in *First* division.

Examination held on 18.08-21.09, 2002  
Result Declared on March 15, 2003

026742

UAC issued on: 18/03/03 at 09:08:05

UAC-2003-0001, 0002, 0003, 0004, 0005, 0006, 0007, 0008, 0009, 0010, 0011, 0012, 0013, 0014, 0015, 0016, 0017, 0018, 0019, 0020, 0021, 0022, 0023, 0024, 0025, 0026, 0027, 0028, 0029, 0030, 0031, 0032, 0033, 0034, 0035, 0036, 0037, 0038, 0039, 0040, 0041, 0042, 0043, 0044, 0045, 0046, 0047, 0048, 0049, 0050, 0051, 0052, 0053, 0054, 0055, 0056, 0057, 0058, 0059, 0060, 0061, 0062, 0063, 0064, 0065, 0066, 0067, 0068, 0069, 0070, 0071, 0072, 0073, 0074, 0075, 0076, 0077, 0078, 0079, 0080, 0081, 0082, 0083, 0084, 0085, 0086, 0087, 0088, 0089, 0090, 0091, 0092, 0093, 0094, 0095, 0096, 0097, 0098, 0099, 0100, 0101, 0102, 0103, 0104, 0105, 0106, 0107, 0108, 0109, 0110, 0111, 0112, 0113, 0114, 0115, 0116, 0117, 0118, 0119, 0120, 0121, 0122, 0123, 0124, 0125, 0126, 0127, 0128, 0129, 0130, 0131, 0132, 0133, 0134, 0135, 0136, 0137, 0138, 0139, 0140, 0141, 0142, 0143, 0144, 0145, 0146, 0147, 0148, 0149, 0150, 0151, 0152, 0153, 0154, 0155, 0156, 0157, 0158, 0159, 0160, 0161, 0162, 0163, 0164, 0165, 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1826, 1827, 1828, 1829, 1830, 1831, 1832,

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



Serial No. 1EE735

PROVISIONAL RESULT CARD

Name IRSHAD HUSSAIN  
 Father's Name ASHIG HUSSAIN  
 Address C/O HASSAN DENTAL CLINIC ZANANA HOSPITAL  
 ROAD PARACHINAR  
 Tehsil SADDA LOWER KURRAM  
 District KORRAM AGENCY  
 has successfully completed MASTER OF EDUCATION ( M. ED )  
 TEACHER EDUCATION

Koll No. AT622711  
 Registration No. 13AKM00095  
 Final Semester AUT- 2014

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 13	0831	FOUNDATIONS OF EDUCATION	100	54
SPR- 13	0837	EDUCATIONAL RESEARCH	100	63
SPR- 13	0838	CURRICULUM DEVELOPMENT & INSTRUCTION	100	66
SPR- 13	0840	EDUCATIONAL PSYCHOLOGY	100	65
SPR- 14	6505	ISLAMIC SYSTEM OF EDUCATION	100	65
SPR- 14	6507	EDUCATIONAL MEASUREMENT & EVALUATION	100	62
SPR- 14	6552	TEXTBOOK DEVELOPMENT-II	100	68
SPR- 14	6552	TEXTBOOK DEVELOPMENT-I	100	66
AUT- 14	0826	ELEMENTARY EDUCATION	100	65
AUT- 14	0828	HIGHER EDUCATION	100	62
AUT- 14	0827	SECONDARY EDUCATION	100	66
AUT- 14	0827	TEACHER EDUCATION IN PAKISTAN	100	60

*Assessed*

CREDIT HOURS: 35

Total Marks / Obtained

1200 / 762

Result Declared on SEPTEMBER 15, 2015

Percentage / Grade

64 B

Date of issue OCTOBER 12, 2015

*M. Khan*

Controller of Examinations

Disclaimer:

This result card is issued provisionally, even without having received the final result of the examination. It is subject to change without any notice.

GOVERNMENT OF NWFP  
SCHOOLS & LITERACY DEPARTMENT

Dated Peshawar the 19-10-2007

**NOTIFICATION:**

**No. SO(S)3-2/2006/SS(Male).** Consequent upon the recommendations of the NWFP Public service Commission, the competent authority has been pleased to appoint the following subject specialist (Male) in economics & Maths in BPS-17 (Rs. 8210-615-20510) Plus Usual Allowances as admissible under the rules on regular basis but without pension and gratuity in terms of section 19 of the civil servant Act 1973 as amended vide NWFP Civil servants (Amendment) Act, 2005 with immediate effect under the provision of Establishment & Administration Department Circular Bearing No. SOR-6(E&AD) 13-42005 dated 10/08/2005;

1.	Irshad Hussain S/o Ashiq Hussain Sultan Medical Store Near Habib Bank Punjabi Para Chanir Kurram Vill: Malana Kurram Agency
2.	Shahid Afridi S/o Qeemat Khan H. No. 1674 St No. Mera Mohammad Asia Gate Peshawar
3.	Mr. Iftikhar Hussain S/o Abdul Ghaffar, Nadra Wfit Centre Kashmir Chowk Abbottabad
4.	Muhammad Irshad S/o Aleem Khan Vill & P.O Mitha Khel Tehsil & District Karak.
5.	Abdul mahmood S/o Sultam Mahood, Vill Shalbandi Tehsil & P.O Daggarr District Buner
6.	Abdul Monaf S/o Kokaray, Abdul Manaf Qurtaba Public School and College Swari Dagger Buner.
7.	Abdur Rehman S/O Khiyal Badan, Village Bara Khawar Tehsil & District Karak
8.	Aimal Khan S/o Arzumand Khan District & Tehsil Kohat Madina Town Opp: Bahawalngar Kohat Cantt.
9.	Akbar Ali S/o Nawab Ali Aziz Bhatti Shaheed Arzu Cp; ege. Cardam Camtt
10.	Anwar Iqbal S/o Taj Mali Khan Vill; & P.O Bogara Tehsil Takhti-e-Nasratti District Karak
11.	Arshad Mehmood Khan S/o M. Ashraf Khan House No. 582/6, Siddiquia Street No. 2 Kunj Qadeem Abbottabad.
12.	Attaullah Khan S/o Hashim Khan P.A.F Degree College Peshawar Cantt
13.	Gul Zada S/o Shamsul Qamar Moh: Pir Khel Vill and P.O Shahbaz Garhi Tehsil & District Mardan
14.	Hamidullah S/o Daraz Khan Vill: Sheikh Piaw Killa P.O Azim Killi Jadid Tehsil & District Bannu
15.	Irshad Ahmad S/o Abdul Haye, Room No. 31 Hostel No. 9 University of Peshawar
16.	Javed Khan S/o ZUlqadar Vill; Gul Dheri * PO Swabi Near Roazi Akbar Shop Keeper District Swabi
17.	Mohabat Shah S/o Arif Ullah Jan SET, GHS Timergara Dir Lower.
18.	Muhammad Saleem S/o Behram Khan Ausaf Iqra Rauza-Tul-Aftal moh: Sian Abad Akbar Khan Road Manshera.
19.	Muhammad Tufail S/o Allah Dad Khan Vill & P.O Jiskot Tehsil & District Manshera.
20.	Rehmat ALi S/o Mian Said Basher Vill Sumbat Cham Tehsil & PO Matta District Swabi
21.	Sher Ali Khan S/o Haji Nazir Moh Khail Vill: Nawa Kalay Mingora Tehsil Babuzai District swat
22.	Sher Nawab S/o Amir nawab Vill Mallako P.O Munda Tehsil Munda Bajour Agency C/o Ghaznavi Modal School Munda Dir Lower.
23.	Syed Raza Shah S/o Syed Hameed shah, Hameed Shah H.No. Sharif Abad St. No. Dora Road Near Kohat Road Peshawar
24.	Abdullah Khan S/o Gul Dad Khan Vill & P.O Mila Mandar khel District Lakki marwat
25.	Anwar Baig S/o Mumtaz Hussain Qurashi Abad Wazir Bagh Road Near Day Light Video Centre Peshawar
26.	Akbar Said S/o Muhammad Akbar Shankar Katlang Road District Mardan
27.	Nisar Ali S/o Sher Bahadar Vill: Tendu Dagg P.O Shawa District Dir Lower.
28.	Raza Hassan S/o Abdullah Khan H. No. C-12 Legend Building Bazadi Chaker KOt Bannu
29.	Ayaz Ahmad S/o Sher khan Hafiz AYaz Ahmad SS in the SPS College Gul Kada Swat.
30.	Bahadur Zeb S/o ALam Zeb Vill Khan Seari PO Ziarat Talash Tehsil Timergara District Dir Lower.
31.	Basharat Iqbal S/o Muhammad Younis C/o Muhamamd Younis Atta Machine Near Old Bridge Vill; Pore PO Garhi Habibullah District Mashera
32.	Hafiz Tayyeb Ali Shah S/O Sher Dar Ali Shah M. Rushan Book Dept Chowk Baar Bannu
33.	Jalandar Shah S/o Muhammad Sheri Vill Umar Kot P.O Saddo Tehsil Termgara District Dir Lower.

	Taj Muhammad Khan	Peshwar Cantt	
42-	Syed Mukhtar Ali Shah S/O Syed Mukhtar Ali Shah	SS (Biology) (BS-17) GHSS Garhi Kapura Mardan	--do--
43-	Tariq Hayat S/O Mukarram Khan	SS (Biology) (BS-17) GHSS Thand Koi Swat	--do--
44-	Nisar Ahmad S/O Zulfikar Ahmad	SS (Biology) (BS-17) GHSS Abdul Khel Lakk Marwat	--do--
45-	Naveed-Ur-Rehman S/O Khana Jan	SS (Biology) (BS-17) GHSS Chamkani Peshwar	--do--
46-	Qamar Shalazad S/O Muhammad Yaqub Malik	SS (Biology) (BS-17) GHSS Jared Manshira	--do--
47-	Zaheen Ullah S/O Roon Ullah	SS (Biology) (BS-17) GHSS Palo Dheri Mardan	--do--
48-	Ejaz S/O Mirza Khan	SS (H/C) (BS-17) GHSS Beer Haripur	--do--
49-	Daira Wadan S/O Ahmad Shah	SS (H/C) (BS-17) GHSS Baidara Swat	--do--
50-	Gul Nawab Shah S/O Syed Azeem Shah	SS (H/C) (BS-17) GHSS Masazai Peshwar	--do--
51-	Inam Ullah Shah S/O M. Kifayat Ullah Shah	SS (H/C) (BS-17) GHSS Ismail Khel Banni	--do--
52-	Irfan Ullah S/O Aminullah	SS (H/C) (BS-17) GHSS Khanpur Dir Lower	--do--
53-	Muhammad Saif ul Q Wazir S/O Mohd. Akbar Khan	SS (H/C) (BS-17) on appointment as SS his services placed at the disposal of Director of Education (FATA) for further posting	--do--
54-	Muhammad Shafiq Farooqi S/O Muhammad Iqbal	SS (H/C) (BS-17) GHSS Kargani Swabi	--do--
55-	Midrar Ullah S/O Maulvi Hamid Ullah Jar	SS (H/C) (BS-17) GHSS Dheri Bakpani Mardan	--do--
56-	Muhammad Hanif S/O Sher Dil Khan	SS (H/C) (BS-17) GHSS Nathi Gali Abbottabad	--do--
57-	Muhammad Iqbal S/O R. Stefan Khan	SS (H/C) (BS-17) GHSS Chanai Swabi	--do--
58-	Naveed Malik S/O Malik Iqbal	SS (H/C) (BS-17) GHSS Jared Manshira	--do--
59-	Pir Muhammad Khan S/O Noor Muhammad	SS (H/C) (BS-17) GHSS Mayar Jandool Dir Lower	--do--
60-	Samiullah S/O Zarnat Khan	SS (H/C) (BS-17) on appointment as SS his services placed at the disposal of Director of Education (FATA) for further posting	--do--
61-	Saeed Ur-Rehman S/O Muhammad Saeed	SS (H/C) (BS-17) GHSS Havaserai Dir Lower	--do--
62-	Sardar-e-Alam Khan S/O Abdul Majid Khan	SS (H/C) (BS-17) GHSS Abdul Khel Lakk Marwat	--do--
63-	Shahar Ali Khan S/O Hasham Ali Khan	SS (H/C) (BS-17) GHSS Thand Koi Swabi	--do--
64-	Shahzad S/O Saeed Ur-Rehman	SS (H/C) (BS-17) GHSS Garhi Kapura Mardan	--do--
65-	Shahzad Ahmad S/O Muhammad Arif Khan	SS (H/C) (BS-17) on appointment as SS his services placed at the disposal of Director of Education (FATA) for further posting	--do--
66-	Zulfiqar Ali S/O Muhammad Ayub Sari	SS (H/C) (BS-17) GHSS Ayub Khan Killi Swabi	--do--
67-	Zahid Ullah S/O Khan Sardar	SS (H/C) (BS-17) on appointment as SS his services placed at the disposal of Director of Education (FATA) for further posting	--do--
68-	Abdul Bari S/O Habibullah	SS (H/C) (BS-17) GHSS Darresh Chitral	--do--
69-	Muhammad Fayyaz S/O Abdul Ghayas	SS (H/C) (BS-17) GHSS Ismail Swabi	--do--
70-	Muhammad Saeed S/O Muhammad Shafiq	SS (H/C) (BS-17) GHSS Shamoza Swat	--do--
71-	Eashir Ahmad S/O Wazir Ahmad	SS (H/C) (BS-17) GHSS Wari Dir Upper	--do--
72-	Fazal Manan S/O Durr Muhammad	SS (H/C) (BS-17) on appointment as SS his services placed at the disposal of Director of Education (FATA) for further posting	--do--
73-	Israr Ahmad S/O Abdul	SS (H/C) (BS-17) GHSS Naqhi Peshwar	--do--

13

TERMS & CONDITIONS.


- 1- Their services will be considered regular but without superannuation gratuity in terms of Section 19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. They will however be entitled to Contributory Provident Fund in such a manner and at such rates as prescribed by the Government.
- 2- Their services will be liable to termination on one month's notice from either side. In case of resignation without notice their two month's pay allowances shall be forfeited to Government.
- 3- The appointee should join his post within 30 days of the issue of this notification. The Director, Schools & Literacy, NWFP, Peshawar would furnish a certificate to the effect that the candidates have joined the post or otherwise, after one month of the issue of this Notification, failing which his candidature will expire automatically and no subsequent appeal etc shall be entertained.
- 4- They would be on probation for a period of two years extendable for another one year.
- 5- They will be governed by such rules and regulations as may be issued from time to time by the Government.
- 6- Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against under the NWFP Removal from Service (Special Power) Ordinance, 2000 and the Rules framed from time to time.
- 7- Charge report should be submitted to all concerned.
- 8- No TA/DA will be allowed to the appointees for joining their duty.

SECRETARY

ENDST. NO. & DATE EVEN.

Copy forwarded for information & necessary action to

- 1- Accountant General, NWFP, Peshawar
- 2- Director, Schools & Literacy, NWFP, Peshawar
- 3- Director of Education (FATA) Peshawar
- 4- District / Agency Accounts Officers Concerned
- 5- EDOs, S&L Concerned.
- 6- PS to Minister for Education, NWFP, Peshawar
- 7- PS to Chief Secretary, NWFP, Peshawar
- 8- PS to Secretary, Schools & Literacy Deptt. NWFP, Peshawar
- 9- Candidates Concerned.
- 10- Director Recruitment, NWFP Public Service Commission, Peshawar
- 11- Deputy Database Administrator, EMIS, S&L Deptt. NWFP
- 12- PA to Additional Secretary, S&L Deptt. NWFP
- 13- PA to Deputy Secretary (Admn) S&L Deptt. Peshawar
- 14- Office order file.

  
(NASRULLAH KHAN)  
SECTION OFFICER (SCHOOLS)

To Whom It May Concern:

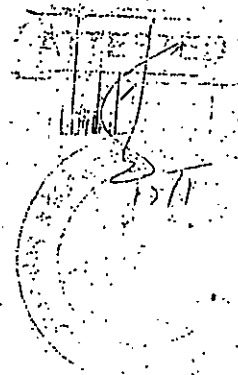
Annex D / 15

Certified that the main Thall Parachinar road remained blocked since November, 2007 due to worst sectarian clashes and law and order situation in the Agency and all kinds of traffic remained suspended. The road was opened from 1<sup>st</sup> November, 2008 till 23<sup>rd</sup> February, 2009 and since then again closed for traffic till date

Political Agent, Kurram

No. 2055 /PAK/Supdt.

Dated 15.1.07 /2009



15/1

12/1

**To whom it may concern;**

Certified that the main thall Parachinar Road remained blocked since November, 2007 due to worst sectarian Clashes and law and order situation in the Agency and all kinds of Traffic remained suspended. The Road was opened from 18<sup>th</sup> November, 2008 to; 23<sup>rd</sup> February, 2009 and since then again closed for traffic till date.

Political Agent, Kurram

No. 2055/PAK/Supdt:  
Dated 15/07/2009

ADJUSTMENT

On account of suspension of mobility and road blockage from Parachinar to Kalaya due to the existing sectarian clashes and law & order situation in the area, the following subject Specialists belonging to shia community are hereby deployed to work at Govt. Post Graduate College Parachinar till re-opening of the road and normalization of the existing law & order situation:-

S/No	Name/Designation/School
1.	Waqar Hussain SS (Physics) GHSS Kalaya, Orakzai Agency
2.	Muhammad Irshad SS (Stat) GHSS Kalaya, Orakzai Agency

NOTE:-

1. Charge report should be submitted to all concerned.
2. They should draw their salaries from their original schools.

( FAELI MANAN )  
 DIRECTOR EDUCATION  
 FATA, N.W.F.P. PESHAWAR

Endst: No. 19704-8

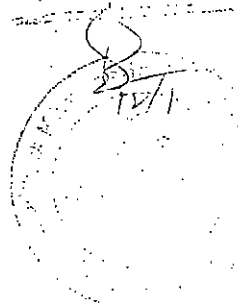
Dated Pesh: the 19/10/09

Copy forwarded to the:-

1. Agency Education Officer, Orakzai Agency at Hangu
2. Principal GPGC Parachinar Kurram Agency with the remark: that you should report about their attendance and perform regularly.
3. Agency Accounts Officer, Orakzai Agency
4. P.A to D.E FATA
5. R/File

ATTACHED

JML  
 DE: DIRECTOR EDUCATION  
 FATA, N.W.F.P. PESHAWAR





To

Annex F 17

The director of Education  
FATA, Peshawar.

Sub: Application for extension of time for qualifying  
B.Ed exam.

Sir,

with due respect it is stated that I  
have been appointed as SS (statistics) on  
19-10-2007. I was given three years time  
to qualify B.Ed exam but as you know  
that there are sectarian issues and law &  
order situation is not good in paraclines.  
So it is not possible for me to qualify  
B.Ed exam in the given time.

It is therefore requested that the time  
given to me for qualifying B.Ed may be  
extended for me.

D: 12-10-2009

yours obediently  
<sup>his</sup>  
Irshad Hussain  
GHSS Kalaya  
Orakzai Agency



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the April 16, 2014

**NOTIFICATION**

**NO.SO(S/M) E&SED/1-3/2014/Promotion BS-17 to BS-18/4-tier 2<sup>nd</sup> Phase** : The Competent Authority on the recommendations of the Provincial Selection Board is pleased to promote/appoint the following (520) Officers of Teaching Cadre of Elementary & Secondary Education Department from BS-17 to BS-18 on regular basis with immediate effect as under except Sr. No. 1:

Sr.#	Name	Sr.#	Name	Sr.#	Name
1	Mr. Gul Yar Khan	2	Mr. Fateh Gul	3	Mr. Nuratullah
4	Mr. Ghulam Baqi Jan	5	Mr. Amal Shah	6	Mr. Aurang Zeb
7	Mr. Inayatullah	8	Mr. Kifayat Ullah Jan	9	Mr. Ghulam Rabbani
10	Mr. Muhammad Yaqoob	11	Mr. Muqarrab Khan	12	Mr. Abdur Rashid
13	Mr. Mir Haider	14	Mr. Ismail	15	Mr. Abdur Rehman
16	Mr. Nizakat-ur-Rehman	17	Mr. Iqbal Munir	18	Mr. Muhammad Siraj
19	Mr. Naeem Jan	20	Mr. Muhammad Pervez	21	Mr. Abdullah Shah
22	Mr. Hakam Khan	23	Mr. Gul Ambar Khan	24	Muhammad Idrees Khan
25	Mr. Abdul Malik	26	Mr. Mustafa Khan	27	Mr. Abbas Gul
28	Muhammad Zareen Khan	29	Muhammad Khurshid	30	Mr. Mehboob Ilahi
31	Mr. Fazal Rehman	32	Mr. Sherzada	33	Mr. Suhrab Khan
34	Mr. Akhtar Hussain	35	Mr. Abdul Qayum	36	Mr. Inayat-ullah
37	Mr. Muhammad Sadiq	38	Mr. Hidayatullah Kahn	39	Mr. Fida Muhammad
40	Mr. Ghazi Marjan	41	Muhammad Sher Ali Khan	42	Mr. Fazal Muhammad
43	Mr. Riaz Hussain	44	Mr. Farzand Ali	45	Mr. Sharif ullah Khan
46	Mr. Abdul Latif	47	Mr. Zahid Hussain	48	Mr. Ihsan-ul-Haq
49	Mr. Muhammad Jamshaid	50	Mr. Hidayat-ur-Rehman	51	Mr. Gul Aslam
52	Mr. Irshad Ahmad	53	Mr. Almas Khan	54	Mr. Muhammad Ali
55	Mr. Abdullah Khan	56	Mr. Muhammad Shafiq	57	Mr. Khalid Ahmad
58	Mr. Iftikhar Ahmad	59	Mr. Saeed Ahmad	60	Mr. Muhammad Mubashir
61	Mr. Shah-e-Room	62	Mr. Zulfikar Ali	63	Mr. Zafar Javed Qureshi

19/11

S.r	Name	Sr.	Name	Sr.	Name
64.	Mr. Nasrullah Zeb	65.	Muhammad Aslam	66.	Alam Zeb Khan
67.	S. Muhammad Tariq	68.	Nizar Ali	69.	M. Daraz Khan
70.	Mr. Chen Zeb	71.	Jamil Ahmad	72.	Riaz Khan
73.	Mr. Muhamamd Sadiq	74.	Iqbal Ali Shah	75.	Azim Khan
76.	Mr. Akhtar Waheed	77.	Norani GUI	78.	Khalil ur Rehman
79.	Mr. Tayyab Shahzad	80.	Sher ALi Khan	81.	Sher Habib
82.	Mr. Gul Islam	83.	Daud ur Rehman	84.	Mian Zia ud Din
85.	Mr. Israj Ali	86.	Sajjid Aziz	87.	Muhammad Shafqat
88.	Mr. Mahboob Khan	89.	Jehanzeb	90.	Jan Sahib Ali
91.	Wali Ullah	92.	Sair Ullah	93.	Mehrab Gul
94.	Raza Muhammad	95.	Muhammad Israr	96.	Muhammad Younas
97.	Hayat Muhammad	98.	Ihsanullah	99.	Khizar Hayat
100.	Gulfam Iqbal	101.	Niamat Ullah	102.	Habib ur Rehman
103.	Zard Ail Khan	104.	Muhammad ayaz Khan	105.	Abdur Rashid
106.	Mr. Muhamamd Anwar	107.	Hazrat Umar	108.	Faiz ur Rehman
109.	Khan GUI Jadoon	110.	Nadeem Sultan	111.	Iqbal Ali
112.	Amin ur Haq	113.	Javid Akhtar	114.	Said Badshah
115.	Khan Badshah	116.	Syed latif Shah	117.	Muhammad Ghulam
118.	Muhammad Rahim	119.	Fayyaz Ahmad	120.	Muhammad Askar
121.	Muzafar Shah	122.	Mehboob ur Rehman	123.	Lal Wadood
124.	Younis Ali Khan	125.	Fazal Rabbi	126.	Farid Khan
127.	Tariq Farooq	128.	Shahbaz Muhammad	129.	Malik Muhammad Naeem
130.	Khurshid Ali Khan	131.	Zainullah	132.	Hamid Hussain
133.	Abdul hamid	134.	Ghulam Daud Khan	135.	Ihsan Ullah
136.	Munir Khan	137.	Ahmad Saeed	138.	Shahid Ali
139.	Muhammad	140.	Muhammad Tahir	141.	Salar islam Tariq
142.	Syed Muhammd Ayaz Shah	143.	Gul Nawab Khan	144.	Amir Sultan
145.	Muhammad Tahir	146.	Numan Ali	147.	Inayatullah Khan
148.	Mr. Rafiullah Khan	149.	Muhammad Hameed	150.	Izzat Khan
151.	Mr. Harzand ALi Khan	152.	Warqa Hussain	153.	Muhamamd wakil
154.	Qudrat Ali Khan	155.	Abid Hussian	156.	Fazal Wahab

20  
 11  
 22

Sr.#	Name	Sr.#	Name	Sr.#	Name
157	Mr. Nisar Ahmad	158	Mr. Bakht Kawan	159	Mr. Abdul Ala
160	Mr. Mir Aslam	161	Mr. Munawar Khan	162	Mr. Abdus Shakoor
163	Mr. Jehanzeb	164	Mr. Akram Said	165	Muhammad Jalil Khan
166	Mr. Farman Ali	167	Mr. Sharif-ud-Din	168	Said Muhammad Khan
169	Mr. Habibullah	170	Said Aman Ullah Shah	171	Mr. Qayyum Nawaz
172	Mr. Habibullah Khan	173	Mr. Shah Jehan Khan	174	Mr. Usman Ghani
175	Mr. Muhammad Rafiq	176	Mr. Nawab Khan	177	Mr. Saif ullah Khan
178	Mr. Zahid-Ullah	179	Mr. Faqir Muhammad	180	Mr. Muhammad Ibrahim
181	Mr. Ashraf Ali Khari	182	Mr. Aman ullah Khan	183	Muhammad Umar Khan
184	Mr. Habib Ali	185	Mr. Muhammad Islam	186	Mr. Hakim Ullah
187	Mr. Akhtar Abbas	188	Mr. Muhammad Alam	189	Mr. Akhtar Ali
190	Mr. Hamid Ullah	191	Mr. Ajmal Qadir	192	Mr. M Irfan Ullah
193	Mr. Abdur Rehman	194	Mr. Abdul Nawaz Khan	195	Mr. Sana ullah
196	Mr. Khurshid Alam	197	Mr. Mujeeb Ullah	198	Mr. Changez Khan
199	Mr. Shaukat Rehman	200	Mr. Muhammad Nabi	201	Mr. Pervaiz Khan
202	Mr. Saeed Ahmad	203	Mr. Iftikhar Ahmad	204	Mr. Fazli Umar
205	Muhammad Rizwanullah	206	Mr. Bashir Ahmad	207	Mr. Muazam Shah
208	Mr. Shahid Ahmad	209	Mr. Muhammad Tariq	210	Mr. Atiqur Rehman
211	S. Shah Hassan Shah	212	Mr. Iqtidar Ali	213	Mr. Mutahir Khan
214	Mr. Zaiullah	215	Mr. Nasrullah	216	Mr. Muhammad Javed
217	Mr. Khaliq Dad Khan	218	Muhammad Naeem Khan	219	Mr. Muhammad Azim
220	Mr. Nawazish Mehboob	221	Mr. Johar Ali	222	Mr. Zia-ul-Islam
223	Mr. Abdur Raziq	224	Mr. Aziz-ur-Rehman	225	Mr. Ali Said
226	Mr. Ismatullah Khan	227	Mr. Noor-ul-Qamar	228	Mr. Abid Hussain
229	Mr. Riaz	230	Mr. Abdur Rashid	231	M. Naeem Siddiqui
232	Mr. Asmatullah	233	Mr. Muhammad Aslam	234	Mr. Muhammad Yousaf
235	Mr. Tahir Jan	236	Mr. Gohar Hayat	237	Mr. Hamid Khan
238	Mr. Mohibullah Khan	239	Mr. Sabir Rehman	240	Mr. Abdul Basir
241	Mr. Muhammad Nazir	242	Mr. Asghar Ali	243	Mr. Habib-ur-Rehman
244	Mr. Muhammad Riaz	245	Mr. Ghulam Zahir	246	Mr. Sajjad Akbar
247	Mr. Saeed-ur-Rehman	248	Muhammad Roman Khan	249	Mr. Shaukat Ali
250	Mr. Nazirullah Khan	251	Mr. Kamal Ahmad	252	Mr. Zahid Iqbal

ATTESTE  
 [Signature]  
 [Stamp]

21

Sr.#	Name	Sr.#	Name	Sr.#	Name
253	Mr. Muhammad Sayyar	254	Mr. Inayatullah Khan	255	Mr. Mukhtiar Ali
256	Mr. Aziz Ahmad	257	Mr. Khalil-ur-Rehman	258	Mr. Akbar Saeed
259	Mr. Akbar Khan	260	Mr. Abdul Ali Khan	261	Mr. Minhaj-ud-Din
262	Mr. Shah Saud	263	Muhammad Sadiq Shah	264	Mr. Sabir Khan
265	Mr. Sajad Hussain	266	Mr. Waheed Shah	267	Mr. Sher Muhammad
268	Mr. Muhammad Quresh	269	Mr. Abdur Rahim	270	Mr. Waheedullah
271	Mr. Amir Rehman	272	Mr. Dost. Muhammad	273	Mr. Akbar Zaman
274	Mr. Latifullah Khan	275	Mr. Noor Muhammad	276	Mr. Niamat Shah
277	Mr. Rehman Ghani	278	Mr. Muhammad Faisal	279	Mr. Jaffar Ali Khan
280	Mr. Azmat Alam	281	Mr. Shaukat Malik	282	Mr. Khaista Muhammad
283	Mr. Inayatur Rehman	284	Mr. Fayaz Ahmad Khan	285	Muhammad Saeed Khan
286	Mr. Shaukat Ali	287	Mr. Abdul Wali Khan	288	Mr. Muhammad Usman
289	Mr. Umer Zaman	290	Mr. Bakht Afsar	291	Mr. Gul Nawaz
292	Mr. Aziz-ul-Haq	293	Mr. Abdul Bar	294	Mr. Shakeel Iqbal
295	Mr. Muhammad Javed	296	Mr. Noor Alam Khan	297	Mr. Muslih-ud-Din
298	Mr. Shamin Ali	299	Muhammad Shoaib Khan	300	Mr. Musharrif Khan
301	Mr. Abdul Fatah	302	Mr. Muhammad Salar	302	Mr. Muhammad Saleem
304	Mr. Nasser Ahmad	305	Mr. Noor Hazrat	306	Mr. Noor Wali
307	Mr. Abid Ali	308	Mr. Farooq Usman	309	Mr. Gul Nazir Khan
310	Mr. Sarfaraz Khan	311	Mr. Fazal Rabbi	312	Mr. Amir Muhammad
313	Mr. Irshad Ahmad	314	Mr. Amir Khan	315	Mr. Muhammad Ibrahim
316	Mr. Master Khan	317	Mr. Haider Zaman	318	Muhammad Owais Zahid
319	Mr. Zulfiqar Ahmad	320	Mr. Zahoor-ur-Rehman	321	Mr. Khalid Khan
322	Mr. Abdur Rashid	323	Mr. Ishtiaq Ahmad	324	Mr. Inam-ur-Rehman
325	Mr. Mir Sardar	326	Mr. Tariq Khan	327	Mr. Zain-ul-Abidin
328	Mr. Irfan Tayyab	329	Mr. Rahim Din	330	Mr. Gul Zaman
331	Mr. Nazir Khan	332	Mr. Shad Muhammad	333	Khwaja Faiz-un-Nasir
334	Mr. Muhammad Amin	335	Mr. Muhammad Zakir	336	Hafiz Tayyab Ali Shah
337	Mr. Fayaz Aftab	338	Mr. Aziz-ur-Rehman	339	Mr. Arif Ali
340	Mr. Said Basher Kamal	341	Mr. Azaz ullah	342	Mr. Riaz-ul-Haq
343	Mr. Liaq Zaman	344	Mr. Fawad Alam Khan	345	Mr. Mohib-ur-Rehman
346	Mr. Muhammad Abbas	347	Mr. Mukhtiar-ur-Rehman	348	Hafiz Ihsanullah

ATTESTED

22

Sr.#	Name	Sr.#	Name	Sr.#	Name
349	Mr. Muhammad Rehman	350	Mr. Abdul Hamid Qureshi	351	Hafiz Ihsanullah
352	Mr. Muhammad Amjad	353	Mr. Saif-ur-Rehman	354	Mr. Muntaz Muhammad
355	Mr. Hussain Ali Khan	356	Mr. Waqar Ahmad	357	Mr. Javed Khan
358	Mr. Zahid Ali	359	Syed Irshad Hussain Shah	360	Mr. Juma Khan
361	Mr. Umar Zahid Khan	362	Mr. Muhammad Khalid	363	Mr. Jehangir Khan
364	Mr. Abdul Karim	365	Mr. Akbar Said	366	Mr. Anwarullah
367	Mr. Anwar Baig	368	Mr. Fazal Mahmood	369	Mr. Nisar Ahmad
370	Mr. Inayatullah	371	Mr. Muhammad Yaqoob	372	Mr. Jannt Gul
373	Mr. Inayatullah	374	Qazi Amir Hatam	375	Mr. Raza Hassan
376	Mr. Muhammad Kamran	377	Mr. Ghulam Rabbani	378	Mr. Farooq Ahmad
379	Mr. Muhammad Haroon	380	Muhammad Intiaz Khan	381	Mr. Atifullah
382	Mr. Ashraf Raza	383	Mr. Javed Khan	384	Mr. Akbar Ali
385	Mr. Khan Zada	386	Mr. Subhanullah	387	Muhammad Irshad
388	Mr. Din Muhammad	389	Mr. Allah Nawaz	390	Mr. Amir Sultan
391	Mr. Abdur Rehman	392	Mr. Anwarullah	393	Mr. Ahmad Saeed
394	Mr. Shafiqat Ali Khan	395	Mr. Muhabat Shah	396	Mr. Manzoor Elahi
397	Mr. Tariq Hayat	398	Mr. Abdul Mahmood	399	Mr. Muhammad Riaz
400	Mr. Anwar Iqbal	401	Mr. Abdul Manaf	402	Mr. Attaullah
403	Mr. Minhaj-ud-Din	404	Mr. Rehmat Ali	405	Mr. Muhammad Basher
406	Qazi Shafiq-ur-Rehman	407	Mr. Noor-ul-Wahab	408	Mr. Nasim Muhammad
409	Mr. Irshad Ahmad	410	Muhammad Iqbal	411	Muhammad Rasool
412	Mr. Arshad Hussain	413	Mr. Zakir ullah Khan	414	Mr. Aisar Khan
415	Mr. Sher Ghulam Khan	416	Mr. Gul Zada	417	Mr. Muazzam Khan
418	Mr. Sher ur Rehman	419	Mr. Inayatur Rehman	420	Mr. Zahid Ullah
421	Mr. Abdul Bari	422	Mr. Sherin Zada	423	Mr. Abdullah Khan
424	Mr. Sher Ali Khan	425	Mr. Anwar Zaman	426	Mr. Amir Ali Khan
427	Mr. Hazrat Hussain	428	Mr. Muhammad Iqbal	429	Mr. Arif Sohail
430	Mr. Fazal Manan	431	Mr. Khadim Muhammad	432	Mr. Zahid Qayyum
433	Mr. Muhammad Nadeem	434	Muhammad Ali Siddique	435	Mr. Noor Badshah
436	Mr. Rana Baz Khan	437	Mr. Zahir Shah	438	Mr. Akmal Khan
439	Mr. Hussain Ahmad	440	Mr. Qamar Shehzad	441	Mr. Muhammad Ismail
442	Mr. Fazal Hussain	443	Mr. Bakhtiar Ahmad	444	M. Khalid Mahmood

Handwritten notes and signatures on the left margin.

Sr.#	Name	Sr.#	Name	Sr.#	Name
445	Mr. Mukhtiar Muhammad	446	Mr. Ghulam Murtaza	447	Mr. Zahid Iqbal
448	Muhammad Ali Asghar	449	Mr. Muddasir Shah	450	Mr. Anees Muhammad
451	Mr. Jehangir Khan	452	Mr. Askar Ali	453	Mr. Dir'a Wadan
454	Mr. Nazir Ullah	455	Mr. Sikandar Hayat	456	Mr. Muhammad Amin
457	Mr. Khan Wali Shah	458	Haji Khuda Bakhsh	459	Mr. Nasib Gul
460	Mr. Muhammad Nawaz	461	Mr. Abdur Rauf	462	Mr. Bahadar Zeb
463	Mr. Nasrullah	464	Mr. Murad Ali	465	Mr. Muhammad Shafiq
466	Mr. Muhammad Idress	467	Mr. Zaheer Ullah	468	Mr. Murad Ali
469	Mr. Sanat Ullah	470	Mr. Muhammad Abid	471	Mr. Saeed-ur-Rehman
472	Said Akbar	473	Mr. Amjid Ali	474	Mr. Farshed Ullah
475	Mr. Saran zeb Mian	476	Mr. Muntazir	477	Mr. Sajid Ahmad
478	Mr. Abdur Rauf	479	Mr. Maqsood Ali	480	Mr. Ghani-ur-Rehman
481	Mr. Muhammad Iqbal	482	Mr. Saifullah	483	Mr. Munawar Shah
484	Mr. Farooq Shah	485	Mr. Khurshid Alam	486	Bakhtiar Muhammad
487	Mr. Muhammad Ishaq	488	Mr. Riaz Ahmad	489	Mr. Taj Muhammad
490	Mr. Sher Nawab	491	Khawaja Muhammad	492	Mr. Ghulam Hussain
493	Mr. Liaqat Ali Khan	494	Mr. Amir Muhammad	495	Muht. Naveed Sajdar
496	Mr. Noor-ul-Basar	497	Mr. Hayat Muhammad	498	Mr. Zainullah
499	Mr. Muhammad Inveel	500	Muhammad Iqbal Khan	501	Mr. Sher Muhammad
502	Mr. Jftikhar	503	Mr. Alamzeb	504	Mr. Muhammad Zahir
505	Mr. Inam Ullah	506	Muhammad Zakirullah	507	Mr. Raccs Ahmad
508	Mr. Niaz Khan	509	Syed Farooq Shah	510	Mr. Akhtar Nawab
511	Syed Raza Shah	512	Mr. Shah Faisal	513	Mr. Hayat Khan
514	Mr. Munir Ahmad	515	Mr. Sami Ullah	516	Mr. Khalil-ur-Rehman
517	Mr. Niamat Ali	518	Mr. Khalid Iqbal	519	Muhammad Sarwar
520	Mr. Mukhtiar Ahmad				

2. In terms of Section 6(2) of Khyber Pakhtunkhwa Civil Servent Act, 1973 read with rule-15(1) of the Khyber Pakhtunkhwa Civil Servent (Appointment, Promotion & Transfer) rules, 1989, the above mentioned officers of the Teaching Cadre on their promotion shall be on probation for a period of one year.

3. Consequent upon the above, the following postings/transfers are hereby ordered henceforth.

24

*[Handwritten signature]*

*[Handwritten signature]*

S#	Name of Officers and Designation	To be proposed	Remarks
1	Gul Mar Khan, SS (Ec:) B-17 GHSS Fatch Pur Swat	SS Eco B-18 GHSS Fatch Pur Swat	Already Occupied
2	Fatch Gul I/C Pri: GHSS Gardai Bajour	Promoted to BS-18	Place at the disposal of Director of Education FATA
3	Nusratullah SS: Biology B-17 GHSS Hakim Khan Haved Bannu	SS Bio B-18 GHSS Ramak DIK	Vice Sr.No.521
4	Ghulam Baqi Jan HM B-17, GHS Saggi DIK	VP B-18 GHSS No.3 DIK	Against Vacant Post
5	Amal Shah HM GHS No.2 Pirpai Nowshera	Pri B-18 GHS Bara Banda Nowshera	Vice Sr.No.522
6	Aurang Zeb SS: Islamiat B-17 GHSS, Dosehra Charsadda	SS Isl. B-18 GHSS Dosehra Charsadda	Already Occupied
7	Inayat Ullah HM GHS Lund Ahmad Khel Lakki	Pri: B-18 GHS Behram Khel Lakki	Vice Sr.No.523
8	Kifayat Ullah Jan SS Islamiat B-17 GHSS No 1 Peshawar Cantt.	SS Islamiat B-18 GHSS No 1 Peshawar Cantt.	Already Occupied
9	Ghulam Rabbani SS Islamiat B-17 GHSS Darra Pezu Lakki	SS Islamiat B-18 GHSS Darra Pezu Lakki	Already Occupied
10	Muhammad Yaqoob SS Islamiat B-17 GHSS Warana Karak	SS Islamiat B-18 GHSS Warana Karak	Already Occupied
11	Muqarrab Khan HM GHS Ghazi Mar Jan FR Bannu	Promoted to BS-18 and Services Placed at the disposal of Director of Education FATA	Subject to provision of satisfactory PERs from 2005 to 2005
12	Abdur Rashid SS-Islamiat B-17 GHSS Domel Bannu	SS Isl B-18 GHSS Domel Bannu	Already Occupied
13	Mir Haider SS, Isl: B-17 GHSS, Bareela, Haripur.	SS Isl B-18 GHSS Kot Najibullah Haripur	Vice Sr.No.352
14	Ismail SS Islamiat B-17 GHSS Samar Bagh Dir(Lower)	SS Islamiat B-18 GHSS Samar Bagh Dir(Lower)	Already Occupied
15	Abdur Rehman SS Islamiat B-17 GHSS Ismailia Swabi	SS Islamiat B-18 GHSS Ismailia Swabi	Already Occupied
16	Nizakat-ur-Rehman SS H/C B-17 GHSS Shergarh Manshra	V/P BS-18 GHSS No.1 Manshra	Against Vacant Post
17	Iqbal Munir SS H/Pol Sc GHSS Hakim Haved, Bannu	Died on 22-02-2014	Died on 22-02-2014
18	Muhammad Siraj SS H/C B-17 GHSS Khawaza Khela Swat	SS H/C B-18 GHSS Khawaza Khela Swat	Already Occupied
19	Naeem Jan SS H/C B-17 GHSS Saddo Dir (Lower)	SS H/C B-18 GHSS Munda Dir (Lower)	Against Vacant Post
20	Muhammad Pervez SS H/C B-17 GHSS Dehri Julogram Mkd	SS H/C B-18 GHSS Dehri Julogram Mkd	Already Occupied
21	Abdul Ullah Shah SS H/C B-17 GHSS Chaghar Matti Peshawar	Pri: B-18 GHS Takht Ahad Peshawar	Against Vacant Post
22	Hakam Khan SS H/C B-17 GHSS Muryali DIKhan	SS H/C B-18 GHSS Muryali DIKhan	Already Occupied
23	Gul Ambar Khan SS H/C B-17 GHSS Kabal Swat	SS H/C B-18 GHSS Kabal Swat	already Occupied
24	Muhammad Idrees Khan SS H/C B-17 GHSS No.1 Haripur	SS H/C B-18 GHSS No.1 Haripur	Already Occupied
25	Abdul Malik SS H/C B-17 GHSS Chamkani Peshawar	SS H/C B-18 GHSS Chamkani Peshawar	Already Occupied

*[Circular stamp with handwritten text and signature]*



S#	Name of Officers and Designation	To be proposed	Remarks
453	Dir Wadan s/o Ahmad Shah SS (History Cum Civics) B-17 GHSS Baidara Swat	SS (History Cum Civics) B-18 GHSS No. 2 Mangora Swat	Against Vacant Post
454	Nazir Ullah s/o Muhammad Sadiq SS (Islamiat) B-17 GHSS Nadir Bodin Khel FR Bannu	SS Isl B-18 GHSS Hakim Haved Bannu	Vice Sr: No. 624
455	Sikandar Hayat s/o Mir Saadat Khan SS (Physics) B-17 GHSS Chanda Kurram Karak	SS Phy B-18 GHSS Lachi Kohat	Against Vacant Post
456	Muhammad Amin s/o Ali Muhammad SS (Pak. Study) B-17 GHSS Khairabad Nowshera	SS (Pak. Study) B-18 GHSS Khairabad Nowshera	Already Occupied
457	Khan Wali Shah s/o Lal Badshah SS (Stat) B-17 GHSS Kot Kashmir Lakki	SS Stat B-18 GHSS Dara Peroz Lakki	Vice Sr: No. 625
458	Haji Khuda Bakhsh s/o Haji Ghulam Rasool SS (Stat) B-17 GHSS No. 3 D.I. Khan	SS (Stat) B-18 GHSS No. 2 D.I. Khan	Against Vacant Post
459	Nasib Gul s/o Ahmad Gul SS (Stat) B-17 GHSS Shahbaz Khel Lakki	SS Stat B-18 GHSS Nurar Bannu	Against Vacant Post
460	Muhammad Nawaz s/o Shahbaz Khan SS (Maths) B-17 GHSS Sama Badhabera FR Peshawar	Promoted to BS-18	Place at the disposal of Director of Education FATA
461	Abdur Rauf s/o Muhammad Ibrahim SS (Pak. Study) B-17 GHSS No. 4 D.I. Khan	SS (Pak. Study) B-18 GHSS No. 4 D.I. Khan	Already Occupied
462	Bahadar Zeb s/o Alamzeb SS (Biology) B-17 GHSS Ziarat Talash Dir (L)	SS (Bio) B-18 GHSS Munda Dir (Lower)	Against Vacant Post
463	Nasrullah s/o Sabirullah SS (Pak. Study) B-17 GHSS Baghdada Mardan	SS (Pak. Study) B-18 GHSS Baghdada Mardan	Already Occupied
464	Murad Ali s/o Muhammad Karam SS (Stat) B-17 GHSS Haji Baba Mingora	SS (Stat) B-18 GHSS Haji Baba Mingora	Already Occupied
465	Muhammad Shafiq Farooqi s/o Muhammad Iqbal SS (History Cum Civics) B-17 GHSS Kabgani Swabi	SS (History Cum Civics) B-18 GHSS Kabgani Swabi	Already Occupied
466	Muhammad Idress s/o Rustam Khan SS (History Cum Civics) B-17 GHSS Khairabad Nowshera	SS (History Cum Civics) B-18 GHSS Khairabad Nowshera	Already Occupied
467	Zaheer Ullah s/o Roolullah SS (Biology) B-17 GHSS Tarnab Charsadda	SS (Biology) B-18 GHSS Tarnab Charsadda	Already Occupied
468	Murad Ali s/o Sultan Room SS (Stat) B-17 GHSS Balogram Swat	SS (Stat) B-18 GHSS Shamoza Swat	Against Vacant Post
469	Sanat Ullah s/o Said Nawaz Khan SS (Pak. Study) B-17 GHSS Karak City	SS (Pak. Study) B-18 GHSS Karak City	Already Occupied
470	Muhammad Abid s/o Haji Gul SS (Biology) B-17 GHSS Sama Badhabera FR Peshawar	Promoted to BS-18	Place at the disposal of Director of Education FATA
471	Saeed ur Rehman s/o Muhammad Saeed SS (History Cum Civics) B-17 GHSS Haya Sarai Dir (L)	SS (History Cum Civics) B-18 GHSS Khal Dir (Lower)	Vice Sr: No. 626
472	Said Akbar s/o Abdur Khan SS (Physics) B-17 GHSS Dheri Likpani Mardan	SS Phy B-18 GHSS Dheri Likpani Mardan	Already Occupied
473	Amjid Ali s/o Manzoor Hussain HM B-17 GHS Batdoga Manshera	Pri B-18 GHS Khaki Manshera	Against Vacant Post
474	Farshaid Ullah s/o Musharaf Khan SS (Economics) B-17 GHSS No. 4 Peshawar City	SS (Economics) B-18 GHSS No. 4 Peshawar City	Already Occupied

S#	Name of Officers and Designation	To be proposed	Remarks
475	Sarwat Zeb Mian s/o Jehanzeb Mian SS (Economics) B-17 GHSS Madyan Swat	VP B-18 GHSS Madyan Swat	Against Vacant Post
476	Muntazir s/o Abdul Ghaffar SS (Physics) B-17 GHSS Langrial Abbottabad	SS Physics B-18 GHSS Bagra Haripur	Against Vacant Post
477	Sajid Ahmad s/o Fazle Rashid SS (Stat) B-17 GHSS Ouch Dir (L)	Prl B-18 GHSS Khairabad Dir(Lower)	Vice Sr.No.627
478	Abdur Rauf s/o Zar Dadkhah SS (Pak.Study) B-17 GHSS Sama Badhabera FR Peshawar	Promoted to BS-18	Place at the disposal of Director of Education FATA
479	Maqsood Ali s/o Abdul Jalil SS (English) B-17 GHSS Mansabdar Swabi	SS Eng B-18 GHSS Ismaili Swabi	Vice Sr.No.628
480	Ghani ur Rehman s/o Fazal Ghani SS (Urdu) B-17 GHSS Saddo Dir (L)	Prl. B-18 GHS Tormang Dir(L)	Against Vacant Post
481	Muhammad Iqbal s/o Muhammad Nawaz SS (Pak.Study) B-17 GHSS Kotjai D.I. Khan	Prl B-18 GHS Umar Khel D.I.Khan	Against Vacant Post
482	Saifullah s/o Sanubar SS (Stat) B-17 GHSS Pir Pai Nowshera	SS (Stat) B-18 GHSS Pir Pai Nowshera	Already Occupied
483	Munawar Shahi s/o Jalal Shah SS (Pak Study) B-17 GHSS Darband Mansehra.	SS PS B-18 GHSS Behali Mansshera	Vice Sr.No.629
484	Farooq Shah s/o Gulman Shah SS (Stat) B-17 GHSS Nizampur Nowshera	VP B-18 GHSS Nizampur Nowshera	Against Vacant Post
485	Khurshid Alam s/o Qamar Zaman SS (Pak Study) B-17 GHSS Kotgram Dir(Lower)	Instructor B-18 RITE(M) Thana Malakand	Against Vacant Post
486	Bakhtiar Muhammad s/o Abdul Wahab SS (Pak.Study) B-17 GHSS Kuza Banda Battagram	Prl. B-18 GHS Chatari Plan Battagram	Against Vacant Post
487	Muhammad Ishaq s/o Muhammad Zaman SS (Pak.Study) B-17 GHSS Spin Dhand Bara Khyber Agency	SS PS BS-18 GHSS Khesghi Payan Nowshera	Against Vacant Post
488	Riaz Ahmad s/o Aziz ur Rehman SS (Maths) B-17 GHSS Mian Brangola Dir (L)	V/P GCMHS No.1 Bathkela Malakand	Against Vacant Post
489	Taj Muhammad s/o Muhammad Noor SS (Economics) B-17 GHSS Tajzai Lakki	SS (Economics) B-18 GHSS Tajzai Lakki	Already Occupied
490	Sher Nawab s/o Amir Nawab SS (Chem) B-17 GHSS Gaddai Bajour	Promoted to BS-18	Place at the disposal of Director of Education FATA
491	Khwaja Muhammad s/o Abdul Wahab SS (Islamiat) B-17 GHSS Gardai Bajour	Promoted to BS-18	Place at the disposal of Director of Education FATA
492	Ghulam Hussain s/o Qasim Khan SS (Physics) B-17 GHSS Shahoor SWA	Promoted to BS-18	Place at the disposal of Director of Education FATA
493	Liaqat Ali Khan s/o Bahadar Sher SS (Physics) B-17 GHSS Gul Bahar Peshawar	SS Phy. B-18 GHSS Khairabad Nowshera	Vice Sr.No.631
494	Amir Muhammad s/o Haji Fazle Rabbani SS (Maths) B-17 GHSS Pir Saddi Mardan	SS Maths B-18 GHSS Kabgani Swabi	Against Vacant Post
495	Muhammad Naveed Safdar s/o Muhammad Ramzan Safdar SS (Maths) B-17 GHSS Mandran Kalan DIK	SS Maths B-18 GHSS Muryali D.I.Khan	Against Vacant Post
496	Noor ul Basar s/o Kamal Zai SS( Islamiat) B-17 GHSS Mansabdar Swabi.	SS Isl B-18 GHSS Ismaili Swabi	Against Vacant Post
497	Hayat Muhammad s/o Naeem Khan SS (Stat) B-17 GHSS Eidak NWA	Promoted to BS-18	Place at the disposal of Director of Education FATA

ATTESTED

17/11

27

Sl. No.	Name of Officers and Designation	To be proposed	Remarks
498	Zain-Ullah s/o Mian Shahzada HM B-17 GHS Degan Taji Killa Bannu	Pr B-18 GHS Degan Taji Killa Bannu	Already Occupied
499	Muhammad Javed s/o M. Nawab Khan B-17 GHS Abaha Swat	Pr B-18 GHS Abaha Swat	Already Occupied
500	Muhammad Iqbal Khan s/o Abdul Sattar SS (Pak. Study) B-17 GHSS Pيران, Manshera	SS B-18 GHSS Dignitor Abbottabad	Vice Sr. No. 634
501	Sher Muhammad s/o Jan Gul SS (Islamiat) B-17 GHSS No. 1 Kohat	SS (Islamiat) B-18 GHSS No. 1 Kohat	Already Occupied
502	Mikhar s/o M. Yousaf SS (Stat) B-17 GHSS Richhen Abbottabad	SS Stat B-18 GHSS Nuwashera Abbottabad	Vice Sr. No. 635
503	Alamzeb s/o Haji Amir Nawaz Khan SS (Pak. Study) B-17 GHSS Chahani Mohmand Agency	Promoted to BS-18	Place at the disposal of Director of Education FATA
504	Muhammad Zahir s/o Aziz ur Rehman SS (Pak. Study) B-17 GHSS Hazar Khwani Peshawar	SS (PS) B-18 GHSS No. 4 Kakshat Peshawar	Vice Sr. No. 103
505	Inam Ullah s/o Abdul Hameed SS (Economics) B-17 GHSS Gul Duhar Peshawar	SS Eco B-18 GHSS Sherpao Charsadda	Vice Sr. No. 636
506	Muhammad Zakirullah s/o Fazal Muhammad SS (History Cum Civics) B-17 GHSS Qilla Dir (L)	VP B-18 GHSS Qilla Dir (L)	Against Vacant Post
507	Races Ahmad s/o Saeed Ahmad SS (Stat) B-17 GHSS Chakdara Dir (L)	VP B-18 GHSS Ouch Dir (Lower)	Against Vacant Post
508	Niaz Khan s/o Abbas Khan SS (Urdu) B-17 GHSS Nurar Bannu	SS Urdu B-18 GHSS Domel Bannu	Against Vacant Post
509	Syed Farooq Shah s/o Sardar Khan SS (Maths) B-17 GHSS Ismail Khel Bannu	SS (Maths) B-18 GHSS Ismail Khel Bannu	Already Occupied
510	Akhtar Nawab s/o Bakht Nawab SS (Economics) B-17 GHSS Khwza Khela Swa	VP B-18 GHSS Khwaza Khela Swat	Against Vacant Post
511	Syed Raza Shah s/o Syed Hamid Shah SS (Chem) B-17 GHSS Fatima Mardan	SS Chem B-18 GHSS Doshra Charsadda	Vice Sr. No. 637
512	Shah Faisal s/o Saeed ur Rehman SS (History Cum Civics) B-17 GHSS Baghicheh Dheri Mardan	SS (History Cum Civics) B-18 GHSS No. 1 Mardan	Against Vacant Post
513	Hayat Khan s/o Muhammad Miskeen SS (Pak. Study) B-17 GHSS Sherpur Manshera	SS PS B-18 GHSS Duffa Manshera	Against Vacant Post
514	Munir Ahmad s/o Sher Muhammad SS (History Cum Civics) B-17 GHSS Palan Hangu	SS (H/C) B-18 GHSS Doaba Hangu	Vice Sr. No. 638
515	Saud Ullah s/o Zarnat Khan SS (History Cum Civics) B-17 GHSS Bidak NWA	Promoted to BS-18	Place at the disposal of Director of Education FATA
516	Khalil ur Rehman s/o Lair Jan SS (English) B-17 GHSS Kalaya Orakzai Agency	Promoted to BS-18	Place at the disposal of Director of Education FATA
517	Niamat Ali s/o Fazal Ali SS (Biology) B-17 GHSS Dheri Lakpani Mardan	SS Bio B-18 GHSS Dheri Lakpani Mardan	Already Occupied
518	Khalid Iqbal s/o Naseer Khan SS (Biology) B-17 GHSS Lachi Kohat	SS (Biology) B-18 GHSS Lachi Kohat	Already Occupied
519	Muhammad Sawar s/o Muhammad Nisar SS (English) B-17 GHSS Khanpur Dir (L)	Instructor B-18 RITE (M) Timaragar Dir	Against Vacant Post

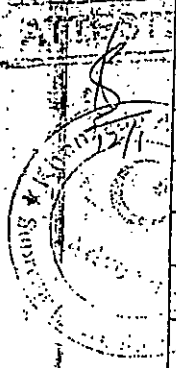
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91

28

Sl#	Name of Officers and Designation	To be proposed	Remarks
520	Mukhtiar Ahmad s/o Haider Khan SS (Physics) B-17 GHSS Manga Mardan	SS Phy B-18 GHSS Gujjar Garhi Mardan	Vice Sr.No.639
<b>CONSEQUENTIAL TRANSFER</b>			
521	Umar Zaman SS Bio B-17 Working B-18 at GHSS Ramak DIK	SS Bio B-17 GHSS Shore Kot DIK	Against Vacant Post
522	Muhammad Ayaz HM B-17 working as Pri B-18 GHS Bara Banda Nowshera	HM B-17 GHS Mian Isa Nowshera	Against Vacant Post
523	Dadshah Mir HM B-17 working on B-18 at GHS Behram Khel Lakki	HM B-17 GHS Tujori Lakki	Vice Sr.No. 705
524	Hamid Khan Pri BS-18 GCMHS Muslimabad Kohat	Pri BS-18 GHS Behzadi Chakar Kot Kohat	Against Vacant Post
525	Khalid Rehman HM B-17 working at B-18 GHSS Mirpur Abbottabad	HM B-17 GHS Sarhan Abbottabad	Against Vacant Post
526	Akhtar Hussain SS PS B-17 working on B-18 GHSS Tajzai Lakki	SS Pak Studies B-17 GHSS Abba khel Lakki	Vice Sr.No.35
527	Muhammad Farooq SS Chem B-17 working on B-18 GHSS Jallozai Nowshera	SS Chem: B-17 GHSS Musazai Peshawar	Vice Sr.No.39
528	Gul Rehman HM B-17 working on B-18 at GHSS Adam Dheri Dir(Lower)	HM B-17 GHS Mian Banda Dir(Lower)	Against Vacant Post
529	Israr Hussain HM B-17 working on B-18 as VP GHSS Ustarzai Payan Kohat	HM B-17 GHS Mary Payan Kohat	Against Vacant Post
530	Younas Khan SS Chem B-17 GHSS Kot Kashmir Lakki	SS Chem B-17 GHSS Abba Khel Lakki	Sr.No:55
531	Ashiq Hussain HM B-17 GHSS Kohat	HM B-17 GHS Chishma Mitah Khan Kohat	Against Vacant Post
532	Wajid Ali Shah SS PS B-17 working as B-18 GHSS No.1 Manshera	SS Pak Studies B-17 GHSS Dhodial Mansehra	Vice Sr.No.58
533	Hamid Ullah Shah B-17 HM working on B-18 at GHS Ahmadi Banda Karak	HM B-17 GHS Khurram Karak	Against Vacant Post
534	Munawar Shah SS PS B-17 working as B-18 GHSS Bandi Dunda Abbottabad	SS Pak Studies B-17 GHSS Nagri Bala A. Abad	Vice Sr.No.70
535	Umar Shah SS Chem B-17 working on B-18 GHSS Bannu	SS Chem: B-17 GHSS Lalozai Bannu	Vice Sr.No.53
536	Khadim Muhammad HM B-17 working as B-18 at GHS Ramora Dir(Lower)	HM B-17 GHS Laram Dir(Lower)	Against Vacant Post
537	Rahat Shah SS English B-17 working on B-18 at GHSS Dosehra Charsadda	SS Eng B-17 GHSS No.2 Rajjar Charsadda	Against Vacant Post
538	Gul Zar Ahmad HM B-17 working on B-18 at GHS No.2 Haripur	HM B-17 GHS Noordi Haripur	Against Vacant Post
539	Asif ur Rehman SS Eco B-17 working as B-18 GHSS Jandrai Karak	SS Eco B-17 GHSS Shah Balim Karak	Vice Sr.No.93
540	Said Karim B-17 working as VP B-18 at GHSS Dhakki Charsadda	HM B-17 GHS Rashaki Charsadda	Against Vacant Post
541	Rabib Khan SS Bio B-18 GHSS Chamkani Peshawar	SS Bio B-18 GHSS No.4 Kakshai Peshawar City	Vice Sr.No.116
542	Islam Ali SS Chem B-18 Instructor RITE(M) Ghoriwala Bannu	SS Chem B-18 GHSS Hakim, Haved Bannu	Against Vacant Post
543	Fazal Shah SS Bio B-17 working on B-18 at GHSS Sherpao Charsadda	SS Bio B-17 GHSS Nisatta Charsada	Vice Sr.No:107



29

Sl#	Name of Officers and Designation	To be proposed	Remarks
672	Khan Zeb SS Eco B-17 GHSS Palo Dheri Mardan	SS Eco B-17 GHSS Pir Saddi Mardan	Vice Sr.No.671
673	Niaz Wali SS Phy B-17 GHSS Ghazi Kot Buner	SS Phy B-17 GHSS Turakai Swabi	Against Vacant Post
674	Ashfaq Ali SS Bio B-17 GHSS Chanai Swabi	SS Bio B-17 GHSS Tarnkai Swabi	Against Vacant Post
675	Muhammad Saleem SS Eng B-17 GHSS Mankial Swat	SS Eng B-17 GHSS Madyan Swat	Vice Sr.No.676
676	Iqbal Sher SS Eng B-17 GHSS Madyan Swat	SS Eng B-17 GHSS Chamtalai Swat	Against Vacant Post
677	Muhammad Javed SS Chem B-17 GHSS Abdul Khel Lakk	SS Chem B-17 GHSS Amandi Umar Khan Bannu	Against Vacant Post
678	Nasir ali SS Maths GHSS Mohammad Nari Charsadda	SS Maths GHSS Rajar No. 2 Charsadda	Against vacant post
679	Amanullah HM B-17 GHS Lachi Payan Kohat	HM B-17 GHS Landi Jalander Bannu	Against Vacant Post
680	Araf Hussain HM B-17 GHS Ghari Daultazai Mardan	HM B-17 GHS Koragh Mardun	Against Vacant Post
681	Liaqat Ali HM B-17 working on B-18 as VP GHS Gujrat Mardan	HM B-17 GHS Narshak Mardan	Against Vacant Post
682	Jawad ur Rehman SS Maths B-17 GHSS Mansabdar Swabi	SS Maths B-17 GHSS Hassanzai Charsadda	Vice Sr.No.77
683	Khalid Amin SS Physics GHSS Manki Sharif Nowshera	SS Physics B-17 GHSS Sallin Khan Swabi	Against Vacant Post
684	Gulzar Ali HM B-17 GHS Sikandari Swabi	HM B-17 GHS Dagi No.2 Swabi	Against Vacant Post
685	Qamar Zaman SS Bio B-17 GHSS Ramak D.I.Khan	SS Bio B-17 GHSS Amandi Umar Khan Bannu	Against Vacant Post
686	Rehman Ali SS Eng B-17 GHSS Fatehpur Swat	SS Eng B-17 GHSS Balogram Swat	Vice Sr.No.189
687	Mukarram Shah SS Isl B-17 GHSS Sheikh Peshawar	SS Isl B-17 GHSS Gul Bahar Peshawar	Vice Sr.No.209
688	Mehdi Shah V/P BS-18 GHSS Umerzai Charsadda	Principal BS-18 GHSS Rajar No.2 Charsadda	Vice Sr. No. 556
689	Gul Zada SS Physics B-17 working on B-18 GHSS Zaimdara Dir(Lower)	SS Physics B-17 GHSS Haya Sarai Dir(Lower)	Vice Sr.No.158
690	Mr. Farooq Ahmad, SS (Maths) B-17 GHSS Chagharmatti Peshawar	SS Maths BS-17 GHSS Wazir Bagh Peshawar	Vice Sr.No.648
691	Naveed Ahmad SS Stat B-17 working on B-18 GHSS Sherpao Charsadda	SS Stat B-17 GHSS Umarzai Charsadda	Vice Sr.No.439
692	Moasm Khan Assistant Director B-17 office of the Director E&SE KPK Peshawar.	HM B-17 GHS Rashid Ghari Peshawar	Against Vacant Post
693	Gul Dayub SS H/C B-17 GHSS Pir Pai Nowshera	SS (History Cum Civics) B-17 GHSS Hazar Khwani Peshawar	Vice Sr.No.420
694	Zar Badshah HM B-17 working on B-18 GHSS Kandu Khel Karak	HM B-17 GHS Tor Dhand Karak	Against Vacant Post
695	Muhammad Farooq SS Islamiat B-17 working on B-18 GHSS Baffa Manshara	SS Isl B-17 GHSS Dhodial Manshara	Vice Sr.No.332
696	Inayat Ullah HM B-17 GHS Shero Kona DIK	HM B-17 GHS Qura Inayat DIK	Against Vacant Post
697	Alamgir Khan, SS English B-17 working on B-18 at GHSS Shamozai Swat	SS English B-17 GHSS Kokari Swat	Against Vacant Post

ATTESTED



30

*[Handwritten signature]*

Sr	Name of Officers and Designation	To be proposed	Remarks
698	Abdur Rauf SS Chem B-17 GHSS Kathi Gadh DIK	SS Chem B-17 GHSS No.1 Pataapur DIK	Against Vacant Post
699	Muhammad Ashraf HM B-17 Working on B-18 VP at GHSS Lasan Thakral Manshera	HM B-17 GHS M.M.Pol Manshera	Against Vacant Post
700	Wali Dad Khan SS Stat B-17 GHSS Dakki Charsadda	SS Stat B-17 GHSS Musazai Peshawar	Vice Sr.No.371
701	Alam Said SS Phy B-17 GHSS Nissata Charsadda	SS Phy B-17 GHSS Chamtar Mardan	Against Vacant Post
702	Fazli Rabbi, V/P BS-18 GHSS Tahkat Peshawar	Principal BS-18 GHSS Ormar Peshawar.	Against Vacant Post
703	Sardar Ali, SS Chemistry BS-17 working on BS-18 GHSS Barikot Swat	SS Chemistry BS-17 GHSS Balogram Swat	Vice Sr. No. 424
704	Sajad Ali, SS Bio BS-17 working on BS-18 GHSS Barikot Swat	SS Bio BS-17 GHSS Balogram Swat	Vice Sr. No. 111
705	Saadullah Jan, HM BS-17 GHS Tajori Lakki Marwat	HM BS-17 GHS Top Takhti Khel Lakki Marwat	Vice Sr. No.553

4. No TA/DA will be allowed to the appointees for joining their duty.

**CHIEF SECRETARY**

Endst: of even No. & Date

Copy forwarded to:

1. Accountant-General, Khyber Pakhtunkhwa, Peshawar.
2. Additional Accountant General Pakistan Revenue Sub Office, Peshawar.
3. PS to Governor Khyber Pakhtunkhwa, Peshawar.
4. PSO to Chief Minister Khyber Pakhtunkhwa, Peshawar.
5. Director, E&SE Khyber Pakhtunkhwa, Peshawar in response to his Letter/Proposal No. 12/11/18
6. Director, Curriculum & Teacher Education, Abbottabad.
7. Director, Provincial Institute of Teacher Education, Peshawar.
8. Director, Education FATA, FATA Secretariat Warsak Road, Peshawar.
9. Manager Printing Press Khyber Pakhtunkhwa, Peshawar.
10. District Accounts Officers concerned.
11. District Education Officers concerned.
12. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
13. PS to Additional Chief Secretary FATA, FATA Secretariat Warsak Road, Peshawar.
14. PS to Minister E&SE Khyber Pakhtunkhwa, Peshawar.
15. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
16. PS to Special Secretary E&SE Department, Khyber Pakhtunkhwa.
17. PA to Additional Secretary E&SED, Khyber Pakhtunkhwa.
18. Incharge EMISE E&SE Department.
19. Officers Concerned may download the Notification from our official website: [www.kpsc.gov.pk](http://www.kpsc.gov.pk)
20. Office order file.

**ATTESTED**

*[Handwritten signature]*  
12/11/18

**(MUJEEB-UR-REHMAN)**  
**SECTION OFFICER (SCHOOLS/MALE)**

Answered H 31

To,

Chief Secretary

Govt. of KPK

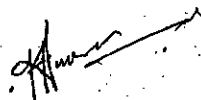
Subject: APPLICATION FOR GRANT OF PROMOTION  
TO BPS-18 OF THE APPLICANT

Sir,

Applicant submits as that I was appointed as SS (Statistics) on 19.10.2007. My colleagues have been promoted to BPS-18, I am not promoted to BPS-18.

It is, therefore, most humbly requested that I may kindly be promoted to BPS-18 as my colleagues are promoted through notification dated 16.04.2015 and my name be included in notification dated 16.04.2015.

Yours obediently,



Irshad Hussain  
SS Statistics  
Govt. Higher Secondary School,  
Shalozan, Kurram Agency

Dated: 14.05.2015

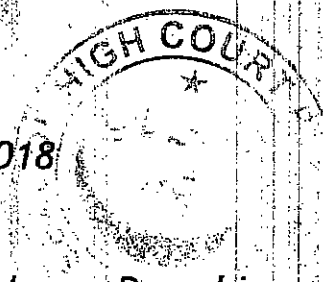
Copy to:

1. Secretary (E&S) Edu. Deptt.  
Peshawar

1

IN THE HONOURABLE PESHAWAR HIGH COURT PESHAWAR

Writ petition no. 530 /2018



Irshad Hussain S/o Ashiq Hussain R/o Malana Parachinar,  
Kurram Agency.

... PETITIONER

VERSUS

1. Chief Secretary through Private Secretary Government of Khyber Pakhtunkhwa, Peshawar.
2. Secretary Education Schools and Literacy Department Govt of KPK, Peshawar.
3. Director Schools and Literacy Govt of KPK, Peshawar.
4. Director of Education FATA Warsak Road, Peshawar.

... RESPONDENTS

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION  
OF ISLAMIC REPUBLIC OF PAKISTAN 1973

SHEWETH,

Facts and grounds: -

1. That on 5 Dec 2004 the provincial public service commission advertised the posts of Subject Specialists along with the certain terms and conditions for the candidates. (Copy of the advertisement is attached).

~~ATTESTED~~  
EXAMINER  
Peshawar High Court  
20 FEB 2018

FILED TODAY  
Deputy Registrar  
13 JAN 2018



under the law. This petition stands disposed of accordingly.

*[Signature]*

JUDGE

*[Signature]*

JUDGE

7385

Date of Presentation of Application 20/2/19  
 No of Pages 3P  
 Copying Fee .....  
 Urgent Fee .....  
 Total 12/2  
 Date of Presentation 20/2/19  
 Date of Delivery 20/2/19  
 Received By Riaz

CERTIFIED TO BE TRUE COPY

*[Signature]*  
 District and Sessions Judge  
 District Court  
 District

20 FEB 2019

Annex J 35

To

Chief Secretary

Govt. of KPK

Sub: Application for grant of Promotion of BPS-18 of the applicant.

Sir,

Applicant submits as that I was appointed as SS (statistics) on 19-10-2007. My colleagues have been promoted to BPS-18, I am not promoted to BPS-18. I filed writ Petition in Peshawar High Court where in the department is directed to decide it through judgment dated 18-2-2019 but till date no order is passed.

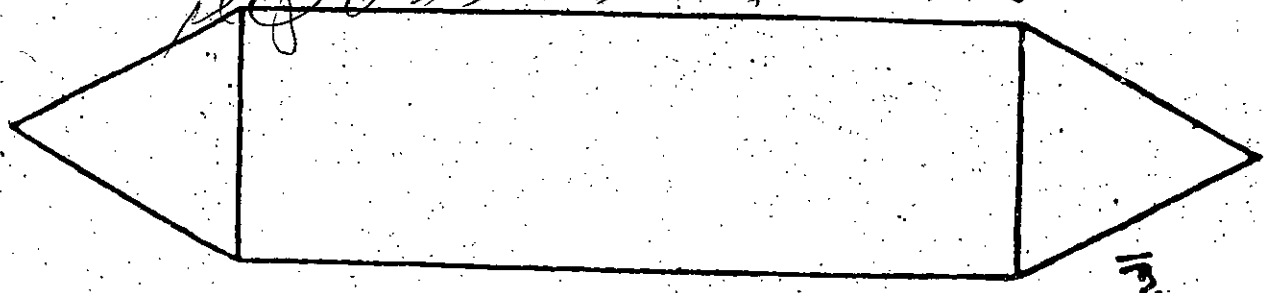
It is therefore most humbly requested that I may kindly be promoted to BPS-18 as my colleagues are promoted through notification dated 16-4-2015 and my name be included in notification dated 16-4-2015.

copy to:

1) Secty (E&S) Edu deptt;  
Peshawar.

yours obediently  
Irshad Hussain  
SS (statistics)  
G/HSS Shalozan  
Karram Agency.

# بعدالت صاحب سروس ٹریڈنگ کمپنی



اللہ صلیب نام گئی و ملت

موزو  
مقدمہ  
دعوی  
جرم

## باعث تحریر انکم

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب وہی وکل کارروائی متعلقہ آن مقام کے لئے محمد اسحاق خان سوانہ کے نام سے مقررہ کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو کرنے راضی نامہ و تقررات و فیصلہ برطرف دیے جواب وہی اور اقبال دعویٰ اور بصورت دیگر کری کرنے اجراء اور وصولی چیک و روپیہ اور مرضی دعویٰ اور درخواست ہر قسم کی تصدیق و فراہم پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا دیگر کیفر یا اپیل کی برآمدگی اور مرنوی نیز دائر کرنے اپیل ٹکرائی و نگرانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے تعزیر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو جس بھی جلد مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پداختہ منظور و قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہرجانہ اتوائے مقدمہ کے سبب سے ہوگا۔ اس کے مستحق وکیل صاحب موصوف ہوں گے۔ نیز بقایا و خرچہ کی ذمہ داری کرنے کا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے۔ اگر یہ دعویٰ مذکور کریں۔ لہذا ذاکات نامہ لکھد یا کہ سند رہے۔

المترجم

کے لئے منظور ہے۔

بقام 0306-8028175

حکومت پنجاب سرحد میں برقیوں کی تعمیر

S.A 1562/2019

پنجاب گورنمنٹ

اڈیشہ

دور رس ممبران کے لئے برقیوں کی تعمیر

میں نے اپنے لئے ایک سہولت فراہم کرنے کے لئے

میں نے اپنے لئے ایک سہولت فراہم کرنے کے لئے

میں نے اپنے لئے ایک سہولت فراہم کرنے کے لئے

میں نے اپنے لئے ایک سہولت فراہم کرنے کے لئے

میں نے اپنے لئے ایک سہولت فراہم کرنے کے لئے

میں نے اپنے لئے ایک سہولت فراہم کرنے کے لئے

میں نے اپنے لئے ایک سہولت فراہم کرنے کے لئے

14/7/2020

اڈیشہ

14/7

میں نے اپنے لئے ایک سہولت فراہم کرنے کے لئے

عدالت جناح نمبر صاحب سروس ٹریبونل چیمبر کیتوں خواہ

SA 1562/2019

ارشاد ہیں نام گورنمنٹ

درخواست ہمارا معاد دوسری بار دینے کے لئے ہمارے سیکورٹی فیس

منجہ عالی، سائل صیفیل عرض رہا ہے۔

۱۔ کہ مقدمہ مندرجہ عنوان بال سے آجے ورغہ 2020-9-15 تاریخ پیش نمبر ہے۔

۲۔ کہ مقدمہ ہذا میں سیکورٹی فیس بہت سے کرنے سے تام ہے۔ میں نے سائل کو سیکورٹی فیس جمع کرانے کے لئے دوسری بار معاد از صہ مندرجہ ہے۔

لذا استدعا ہے کہ سائل کو سیکورٹی فیس جمع کرنے کی حکم صادر فرمائی جائے

المستوفی: 2020-9-15

محمد الیاس خان شیواری انڈیا

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

S.A.# 1562/2019

Irshad Hussain..... Appellant

**VERSUS**

1. Govt of KPK through Chief Secretary, Civil Secretariat Peshawar..... Respondent
2. Secretary of Elementary & Secondary Education, KPK Peshawar.
3. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.

**PARAWISE COMMENTS FOR & ON BEHALF OF THE RESPONDENTS**

**Respectfully Sheweth:**

**The Respondents submit as under:-**

**Preliminary Objections**

1. The appellant has got no cause of action/locus standi.
2. The instant appeal is badly time barred.
3. The appellant has concealed the material facts from this Hon'able Tribunal, hence is liable to be dismissed on this score.
4. The appellant has not come to this Hon'able Tribunal with clean hands.
5. The appellant has filed the instant appeal with malafide intension just to pressurize the Respondent for gaining illegal service benefits.
6. The present appeal is liable to be dismissed fro mis-joinder & non joinder of necessary parties.
7. The instant appeal is against the prevailing law & rules.
8. The appellant is stopped by her own conduct to file the instant appeal.
9. The instant appeal is not maintainable in its present form and also in the present circumstances of the issue.
10. That the Notification dated 16-04-2015 is legally competent and is liable to be maintained in favour of the Respondent.
11. That the appellant has been treated as per law, rules and discretionary powers conferred upon Respondent No.1, under section-10 of Civil Servant Act 1973.
12. That this Hon'able Tribunal has got no jurisdiction to entertain the instant service appeal, as no Departmental Appeal has been filed by the Appellant in stipulated time period.
13. That the Appellant is not an aggrieved person under the relevant Article-212 of 1973 Constitution of Pakistan, because the appellant challenge the Notification dated 16-04-2015 i.e. after lapse of 04 years..

**FACTS.**

1. Para-01 pertains to record, hence no comments.
2. That Para – 02 pertains to the record, hence no comments.
3. Incorrect. At the time of appellant recommendation by the Public Service Commission and his subsequent appointment on 19.10.2007, the appellant was not professionally qualified i.e had no B.Ed degree.(F/A) According to the Public Service Commission Advertisement No. 7/2004 (F/B), the appellant was bound to pass B.Ed Examination within three years (i.e upto 18.10.2010) but the appellant failed to complete B.Ed degree within the stipulated time.
4. Correct to the extent that those candidates holding B.Ed degrees at the time of their appointment were promoted, but the appellant was not professionally qualified i.e had

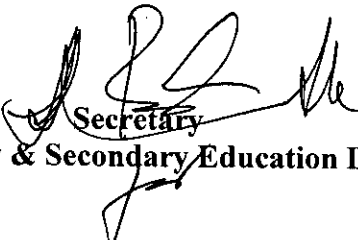
no B.Ed degree, according to Public Service Commission advertisement and service rules, the appellant was bound to pass B.Ed exam within three years i.e upto 2010, but he failed to pass the B.Ed exam within the stipulated time period.

5. That the appellant filed departmental appeal however, there are no provisions for relaxation of rules and appellant was not entitled for promotion. Therefore, the departmental appeal was not accepted by the departments.
6. Correct to the extent that the appellant filed writ petition prior to the instant service appeal. "Petition is converted into representation and sent to the appellate authority for its disposal either way and if the petitioner still feels aggrieved from the order, he may have recourse to the proper forum available under the law." But the instant case is badly time barred, hence liable to be dismissed inter alia on the following grounds.

### **GROUND:**

- A. Incorrect and not admitted. The impugned Notification whereby colleagues of the appellant have been promoted to BPS – 18 is in accordance with law, legal, with lawful authority and effective. The Appellant has been treated in accordance with law and no right of the Appellant has been violated. Hence denied.
- B. Incorrect and not admitted. The Appellant has been treated in accordance with law, rules & Policy. No right of the Appellant has been violated. Hence denied.
- C. Incorrect and not admitted. Those candidates holding B.Ed degrees at the time of their appointment were promoted, whereas the petitioner was not professionally qualified i.e had no B.Ed degree, according to Public Service Commission advertisement and service rules, the appellant was bound to pass B.Ed exam within three years i.e upto 2010, but he failed to pass the B.Ed exam within the stipulated time period.
- D. Incorrect and not admitted. The Appellant has been treated in accordance with law and no right of the Appellant has been violated. Hence denied.
- E. Incorrect and not admitted. The impugned Notification is in accordance with principles of Administrative law and with lawful authority. The Appellant has been treated in accordance with law and no right of the Appellant has been violated.
- F. The Respondents also seek the permission of this Hon'able Tribunal to adduce more grounds and proofs at time of arguments.

**In view of the above made submissions, it is therefore, most humbly prayed that this Hon'able Tribunal may very graciously be pleased to dismiss the appeal with cost in favour of the Respondents.**

  
Secretary  
Elementary & Secondary Education Department

11A

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR

No. 5167 / A-88/Appeal for Seniority

Dated Peshawar the 15/2 /2017.

To

The Secretary,  
Govt. of Khyber Pakhtunkhwa  
Elementary and Secondary Education  
Department Peshawar.

**SUBJECT: INCLUSION OF NAME IN THE SENIORITY LIST OF SS/HM BS-17**

Memo:

I am directed to submit an application (Annexure-A) and detail report of one SS (Statistic), Muhammad Irshad Hussain GHSS Shalozan Kurram Agency for requesting inclusion of name in the seniority list of HM/SS BS-17.

i. Whereas, at the time of recommendation by the PSC on 19.10.2007 he was not professionally qualified i.e. he had no B.Ed degree at the time of his recommendation (Annexure-B).

ii. And Whereas, according to the PSC Commission relaxation, he was given three years duration to pass B.Ed degree, being MA/MSc degree holder (Annexure-C)

iii. And Whereas, he bound to pass B.Ed examination upto 19.10.2010.

iv. And Whereas, he failed to pass B.Ed examination upto 19.10.2010.

v. And Whereas, according to the PSC advertisement for SS if a candidate failed to pass B.Ed degree within due time, his services will automatically be terminated irrespective of any other provisions to the rules for the time being in force.

vi. And Whereas, he passed his B.Ed examination from University of Peshawar on 22<sup>nd</sup> December, 2012 i.e. after five years duration instead of three years. (Annexure-D).

Now he applied for inclusion of his name in the seniority list of SS/HM BS-17. In this connection, the Director Education FATA was asked to submit the detailed report vide this office letter No. 3073/A-88/Appeal for seniority, dated 17.11.2016 (Annexure-E).

Director of Education FATA send his reply vide letter No. 1611, dated 1.2.2017 (Annexure-F) along with a new application (Annexure-G) <sup>in which</sup> ~~and~~ to state that Thall Parachinar road remained blocked since 2007 due to worst sectarian clashes and law and order situation

SD(SM)

Pl. proen

AS@

16/2

DS(E)

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2736  
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109  
9/2



Date: 01/12/2004

**NWFP PUBLIC SERVICE COMMISSION**  
**Scouts Building, Sector B-I, Phase-IV,**  
**Havatabad, Reshwar,**  
**Website: www.nwfp.gov.pk**

Date: 01/12/2004

**ADVERTISEMENT No. 07/2004**

Applications are invited for the following post(s) from Pakistani citizens of NWFP / P.A.T.A. Domicile by 31/12/2004 (15/01/2005 for candidates from Abroad). These posts are on contract basis for Non-Government Servants initially for a period of three years extendable further at the discretion of the Government. In the case of regular government servants, their appointment on selection shall be on regular basis on the terms and conditions already available to them and shall not be affected by the Contract Policy of the Government.

**NOTE:** In accordance with the Government order as contained in circular letter No. SOR/VI (E&AD)1/10/2003-Vol. II dated 09/09/2003, five years age relaxation over and above the existing age limit shall be available to all the candidates.

**HIGHER EDUCATION, SPORTS, ACHIEVES AND LIBRARIES DEPTT.**

**1. Five Female Associate Professors (One each in Botany, Urdu, Political Science, Physics and English.**

**QUALIFICATION:** (i) Ph.D. or equivalent qualification in the relevant subject with nine years teaching / research experience in a recognized College / University or professional experience in the relevant field in a national or international organization and distinguished research publication as a principal author in a standard journal recognized by the University / University Grants Commission (Higher Education Commission) OR (ii) M.Phil in the relevant subject with eleven years teaching / research experience in a recognized College / University or professional experience in the relevant field in a national or international organization and distinguished research work with at least 04 research publications as a principal author in a standard journal recognized by the University / University Grants Commission (Higher Education Commission) **AGE LIMIT:** 30 to 45 years **PAY SCALE:** BPS-19.

- Note:** (i) Teaching / research experience will be counted before or after acquiring M.Phil / Ph.D degrees.  
(ii) One post is reserved for disabled persons whose disability had hampered their academic pursuit.  
(iii) The candidates who have already applied in response to our Advertisement No. 08 / 2003 (serial No. 1) need not apply afresh. Their previous applications will be considered in context of this Advertisement.

**2. One Hundred and Six Female Lecturers (Thirteen in Computer Science, Eleven each in English and Physics, Ten in Statistics, Eight each in Urdu and Mathematics, Six each in Chemistry and Economics, Five in Islamiyat, Four each in Home Economics and Pak Study, Three each in Botany, Political Science and Law, Two each in Zoology, Psychology, Biology and Persian and one each in Geography, History and Rashio for Govt. Girls Colleges, NWFP.**

**QUALIFICATIONS:** 2<sup>nd</sup> Class Master Degree in the relevant subject from a recognized University. **For English:** 3<sup>rd</sup> Class Master Degree in English from a recognized University for teaching English subject with postgraduate Diploma in English language from Allama Iqbal Open University. **For Biology:** 2<sup>nd</sup> Class Master Degree in Botany or Zoology provided that the other subject has been studied at graduate level. **For Law:** 2<sup>nd</sup> Class LL.B degree from a recognized University. **AGE LIMIT:** 21 to 30 years, **PAY SCALE:** BPS-17.

**ALLOCATION FOR:**

- (i) **For Computer Science:** Two to Merit, Three to Zone-1 and two each to Zone-2, 3, 4 and 5.  
(ii) **For English:** One each to Merit, Zone-3, 4 and 5, Five to Zone-1, and Two to Zone-2.  
(iii) **For Physics:** Two to Merit, Three each to Zone-1 and 3, and One each to Zone-2, 4 and 5.  
(iv) **For Statistics:** Two each to Merit and Zone-3, Three to Zone-1, and One each to Zone-2, 4 and 5.  
(v) **For Urdu:** Two each to Merit and Zone-1 and One each to Zone-2, 3, 4 and 5.  
(vi) **For Mathematics:** One each to Merit, Zone-4 and 5, Three to Zone-1, and Two to Zone-3.

- (vii) For Chemistry: One each to Merit, Zone-1, 2, 3, 4 and 5.
- (viii) For Economics: One each to Merit, Zone-1, 2, 3, 4 and 5.
- (ix) For Islamiyat: One each to Merit, Zone-1, 3, 4 and 5.
- (x) For Home Economics: Two to Zone-1, and One each to Zone-3 and 4.
- (xi) For Pak Study: One each to Merit, Zone-1, 4 and 5.
- (xii) For Botany: One each to Merit, Zone-4 and 5.
- (xiii) For Political Science: One each to Merit, Zone-1 and 5.
- (xiv) For Law: One each to Merit, Zone-1 and 4.
- (xv) For Zoology: One each to Zone-1 and 4.
- (xvi) For Psychology: One each to Zone-1 and 2.
- (xvii) For Biology: One each to Merit and Zone-4.
- (xviii) For Persian: One each to Merit and Zone-1.
- (xix) For Geography: Merit.
- (xx) For History: Zone-2.
- (xxi) For Pashto: Zone-1.

3. One Female Lecturer in Economics (Disabled).

**QUALIFICATIONS:** 2<sup>nd</sup> Class Master Degree in Economics or equivalent qualification from a recognized University. **AGE LIMIT:** 21 to 30 years. **PAY SCALE:** BPS-17. **LOCATION:** Government Girls College Chitral. **ALLOCATION:** Open Merit among disabled Females.

**SCHOOLS AND LITERACY DEPARTMENT.**

✓ 4. One Hundred and Thirty-one Headmasters.

**QUALIFICATION:** (i) Master's Degree with B.Ed/M.Ed/M.A. (Education) or equivalent qualification from a recognized University, and (ii) Five years teaching experience in High / Middle Schools owned or recognized by the Government. **AGE LIMIT:** 25 to 40 years. **PAY SCALE:** BPS-17. **ALLOCATION:** Thirty-three to Merit, Twenty-two each to Zone-1, 2 and 3 and Sixteen each to Zone-4 and 5.

5. Two Headmasters (Disabled).

**QUALIFICATION:** (i) Master's Degree with B.Ed/M.Ed/M.A. (Education) or equivalent qualification from a recognized University, and (ii) Five years teaching experience in High / Middle Schools owned or recognized by the Government. **AGE LIMIT:** 25 to 40 years. **PAY SCALE:** BPS-17. **ALLOCATION:** Open Merit among disabled Male.

6. Thirty Headmistresses.

**QUALIFICATION:** (i) Master's Degree with B.Ed/M.Ed/M.A. (Education) or equivalent qualification from a recognized University, and (ii) Five years teaching experience in High / Middle Schools owned or recognized by the Government. **AGE LIMIT:** 25 to 40 years. **PAY SCALE:** BPS-17. **ALLOCATION:** Eight to Merit, Five each to Zone-1, 2 and 3; Four to Zone-4 and Three to Zone-5.

7. Three Hundred and Nineteen Male Subject Specialists (forty-six in Islamiyat; Forty-four in Statistics; Thirty-six in History-cum-Civics; Thirty-four in Pak Study; Twenty-six each in Economics, Chemistry and Physics; Twenty-five in Mathematics; Twenty-three each in English and Biology; Four in Civics, Three each in Pashto and Urdu).

**QUALIFICATION:** Master's Degree in the relevant subject with Bachelor of Education or M.Ed or B.A. Education (Industrial Arts or Business Education) from a recognized University.

**NOTE:** If no suitable candidate possessing the above qualification is available then a candidate possessing a Master's degree in the relevant subject will be considered subject to the condition that such candidate will have to acquire the additional qualification of B.Ed or M.Ed etc as specified above within the stipulated time from the date of appointment, failing which his services shall be terminated in accordance with the provisions of the rules for the time being in force.

**PAY SCALE:** BPS-17. The candidates must possess Master's Degree either in B.A. Education (Industrial Arts or Business Education) or B.A. Science provided that other required subjects has studied at B.A. level. All the provisions of teaching degree will, however, remain intact.

**ALLOCATION:** Eight to Zone-3, Seven each to Zone-1 and 2, Six each to Zone-4 and 5. **ALLOCATION:** Eight to Zone-1, Seven each to Zone-2 and 3 and Six each to Zone-4 and 5.

93 409

For History-cum-Civics: Nine to Merit, Six each to Zone-1 and 2, Seven to Zone-3 and Four each to Zone-4 and 5.

For Pak. Study: Nine to Merit, Five to Zone-1, Six each to Zone-2 and 3 and Four each to Zone-4 and 5.

For Economics: Seven to Merit, Four each to Zone-1 and 3, Five to Zone-2, Three each to Zone-4 and 5.

For Chemistry: Six to Merit, Four to Zone-1, Five each to Zone-2 and 3 and Three each to Zone-4 and 5.

For Physics: Six to Merit, Five to Zone-1, Four each to Zone-2, 3 and 5 and Three to Zone-4.

For Mathematics: Seven to Merit, Four each to Zone-1, 2 and 3 and Three each to Zone-4 and 5.

For English: Six to Merit, Four each to Zone-1, 2 and 3, Three each to Zone-3, 4 and 5.

For Biology: Six to Merit, Four each to Zone-1 and 3, Three to each to Zone-2, 4 and 5.

For Civics: One each to Merit, Zone-1, 2 and 3.

For Pashto: One each to Zone-1, 2 and 3.

For Urdu: One each to Merit, Zone-4 and 5.

8: Seven Male Subject Specialists (DISABLED) (one each in Islamiyat, Statistics, History-cum-Civics, Pak. Study, Economics, Chemistry and Mathematics).

**QUALIFICATION:** Master's Degree in the relevant subject with Bachelor of Education or M.Ed or M.A. Education (Industrial Arts or Business Education) from a recognized University.

**NOTE:** If no suitable candidate possessing the above qualification is available then a candidate possessing Master's degree in the relevant subject will be considered subject to the condition that such appointee shall have to acquire the additional qualification of B.Ed or M.Ed etc as specified above within three years from the date of appointment, failing which his services shall be terminated irrespective of any other provisions of the rules for the time being in force.

**AGE LIMIT:** 25 to 40 years. **PAY SCALE:** BPS-17.

**NOTE:** For History-cum-Civics: The candidates must possess Master's Degree either in History or Political Science provided that other required subjects has studied at B.A. level. The other requirements of teaching degree will, however, remain intact.

**ALLOCATION:** Open Merit among disabled Male.

9: One Hundred and Seven Female Subject Specialists (Nineteen each in Islamiyat and Pak. Study; Fifteen in Mathematics; Eleven in Physics; Nine in Statistics; Eight in History-cum-Civics; Seven each in Biology and Chemistry; Five in Economics; Four in English; Two in Civics and One in Pashto).

**QUALIFICATION:** Master's Degree in the relevant subject with Bachelor of Education or M.Ed or M.A. Education (Industrial Arts or Business Education) from a recognized University.

**NOTE:** If no suitable candidate possessing the above qualification is available then a candidate possessing Master's degree in the relevant subject will be considered subject to the condition that such appointee shall have to acquire the additional qualification of B.Ed or M.Ed etc as specified above within three years from the date of appointment, failing which his services shall be terminated irrespective of any other provisions of the rules for the time being in force.

**AGE LIMIT:** 25 to 40 years. **PAY SCALE:** BPS-17.

**NOTE:** For History-cum-Civics: The candidates must possess Master's Degree either in History or Political Science provided that other required subjects has studied at B.A. level. The other requirements of teaching degree will, however, remain intact.

**ALLOCATION:**

For Islamiyat: Four each to Merit and Zone-1, Three each to Zone-2, 4 and 5 and Two to Zone-3.

For Pak. Study: Five to Merit, Three to Zone-1, Three each to Zone-3, 4 and 5 and Two to Zone-2.

For Mathematics: Three each to Merit, Zone-1 and 2, Two to Zone-3, 4 and 5.

For History-cum-Civics: Two each to Merit and Zone-4, One each to Zone-1, 2, 3 and 5.

For Physics: Three to Zone-1, Two to Merit, Zone-3 and 5, One each to Zone-2 and 4.

For Biology: Two to Zone-1, One each to Merit, Zone-2, 3, 4 and 5.

For Statistics: Three to Zone-1, Two to Zone-4, One each to Merit, Zone-2, 3 and 5.

For Chemistry: Two to Merit and Zone-1, One each to Zone-2, 3 and 4.

For Economics: One each to Merit, Zone-1, 2, 3 and 4.

For Civics: One each to Merit and Zone-1.

For English: Two to Zone-1, One each to Merit and Zone-2.

For Pashto: Merit.

10. Two Female Subject Specialists (DISABLED) (one each in Islamiyat Pak Study).

**QUALIFICATION:** Master's Degree in the relevant subject with Bachelor of Education or M.Ed or M.A. Education (Industrial Arts or Business Education) from a recognized University.

**NOTE:** If no suitable candidate possessing the above qualification is available then a candidate possessing Master's degree in the relevant subject will be considered subject to the condition that such appointee shall have to acquire the additional qualification of B.Ed or M.Ed etc as specified above within three years from the date of appointment; failing which his services shall be terminated irrespective of any other provisions of the rules for the time being in force.

**AGE LIMIT:** 25 to 40 years. **PAY SCALE:** BPS-17,

**NOTE:** For History-cum-Civics: The candidates must possess Master's Degree either in History or Political Science provided that other required subjects has studied at B.A. level. The other requirements of teaching degree will, however, remain intact.

**ALLOCATION:** Open Merit among disabled Female.

LIVESTOCK AND DAIRY DEVELOPMENT DEPARTMENT N.W.F.P.

(Extension Wing)

1. One Female Instructor for Animal Husbandry Inservice Training Institute Peshawar.

**QUALIFICATION:** (a) B.Sc (Hons) Animal Husbandry. Preference will be given to candidates who have obtained the degree of four years course of B.Sc (Hons) Animal Husbandry after F.Sc or Doctor of Veterinary Medicine from a recognized University and (b) Registration with Pakistan Veterinary Medical Council. **AGE LIMIT:** 21 to 35 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Female.

**ALLOCATION:** Merit.

INFORMATION DEPARTMENT

2. One Lady Photographer.

**QUALIFICATION:** (i) Matric with Diploma in Arts from a recognized institution OR (ii) Matric with five years experience photography with an established agency. **AGE LIMIT:** 18 to 35 years. **PAY SCALE:** BPS-11. **ELIGIBILITY:** Female. **ALLOCATION:** Zone-1.

BOARD OF REVENUE N.W.F.P.

3. Four Office Assistants.

**QUALIFICATION:** Bachelor's Degree from a recognized university. **AGE LIMIT:** 18 to 30 years. **PAY SCALE:** BPS-11. **ELIGIBILITY:** Male. **ALLOCATION:** One each Zone-1, 2, 3 and 4.

DIRECTORATE OF TECHNICAL EDUCATION AND MANPOWER TRAINING N.W.F.P.

4. One Librarian.

**QUALIFICATION:** (i) Second Class Bachelor's Degree from a recognized university and (ii) Diploma in Library Science. **AGE LIMIT:** 21 to 35 years. **PAY SCALE:** BPS-16. **ELIGIBILITY:** Male. **ALLOCATION:** Zone-3.

HEALTH DEPARTMENT

5. One Senior Librarian for Saidu Medical College N.W.F.P.

**QUALIFICATIONS:** M.Sc in Library Science from a recognized University. **PAY SCALE:** BPS-16. **AGE LIMIT:** 21 to 32 years, **ALLOCATION:** Merit. **ELIGIBILITY:** Both sexes.

WOMEN HEALTH PROJECT DIRECTORATE

6. One Female Stenotypist in Women Health Project Directorate.

**QUALIFICATIONS:** (i) Intermediate or equivalent qualification from a recognized Board, and (ii) A speed of 60 words per minute in Shorthand in English and 35 words per minute in Typewriting in English and Knowledge of Computer in using MS Word and MS excel. **AGE LIMIT:** 18 to 30 years. **PAY SCALE:** BPS-12. **ALLOCATION:** Open Merit for all Zones.

CORRIGENDUM

One post of Assistant (BPS-11) in Population Welfare Department appearing at serial No. 15 of our Advertisement No. 09 / 2003 stand cancelled due to withdrawal of the said post by the department.

Cont

## GENERAL CONDITIONS

- (i) Age in all cases will be reckoned on 31.12.2004. Govt. servants having rendered four years service shall be allowed Ten years relaxation in upper age limit or to the extent of service whichever is less. Three years age relaxation allowed to Zone 1 and 3 candidates. However, only one age concession shall be allowed to the candidates claiming concession under various categories whichever is more beneficial to the candidates.
- (ii) Degrees / Diplomas / Experience Certificates / Testimonials of unrecognized Institution are not accepted. Only regular degrees / certificates are accepted. However, the candidates can apply on provisional certificate signed by the Controller of Examination of the respective Institution but candidates shall produce original degrees / certificates before their selection. Detail Marks Certificate for all the examination shall necessarily be required and these should be attached with the application forms.
- (iii) Allocation of vacancies in BPS-17 and below shall be strictly in accordance with the Zonal Allocation as indicated against each post(s). The applications of the candidates other than the specified zone shall be ignored except for posts reserved for Merit quota. No zonal reservation stands for posts allocated to disabled quota and also for the posts in BPS-18 and above. All such posts shall be filled in on Open Merit.
- (iv) The candidates applying against disabled posts must attach with their application forms a disability certificate from the Provincial Council for Rehabilitation of Disabled Persons as well as disability certificate from the respective Medical Superintendent / Medical Board showing therein the specific disability.
- (v) Ex-armed Forces Personnel must send copy of Discharge Certificate with their applications. Govt. / Semi Govt. / Autonomous / Semi Autonomous Bodies employees may apply direct but their Departmental Permission Certificates should reach within 30 days of the closing date.
- (vi) Applications should be on the prescribed form obtainable from the listed below branches of the NATIONAL BANK. Application Fee is Rs. 200/- for all the candidates. In addition to the application fee, the candidate will have to pay Rs. 02/- on account of Bank Charges. Separate application form will be required for each advertised category of post. Application form obtained other than the specified branches of the National Bank will be considered invalid and such applications will not be entertained. The applications on plain paper or photostat shall not be accepted. Incomplete and late applications shall also be ignored. Application must be submitted within time as no extra time is allowed for postal transit. The applications if submitted on the last date for receipt of applications must reach the Commission's office by the closing hours. Applicants married to Foreigners are considered only on production of the Govt. Relaxation Orders.
- (vii) No applicant shall be considered in absentia on paper qualifications unless, he possesses exceptionally higher qualifications than the minimum prescribed for a particular post(s). Govt. reserves the right not to fill any or fill more or less than the advertised post(s). Candidates who have already availed three chances after 12.01.1985 by physical appearance before the Commission and have failed for the post(s) having one and the same qualifications and scale of pay shall be ineligible.
- (viii) The candidates already appointed on contract basis in consequence to their selection by the departmental selection committees on any one of the above advertised posts shall have to apply to the Commission. In case they could not be recommended by the Commission, their services shall be liable to termination on the arrival of the selectees of Public Service Commission.
- (ix) Experience wherever prescribed shall be counted after the minimum qualifications for the post(s), if not specifically provided otherwise against the advertised post(s).
- (x) In cases where the number of applications received for post(s) are disproportionately higher than the number of available vacancies, shortlisting of the candidates may be done in any one of the following manner:
- (a) Written Test in the Subject.
  - (b) General Knowledge or Psychological General Ability Test.
  - (c) Academic and / or Professional record as the Commission may decide.

### SPECIFIED BRANCHES OF THE NATIONAL BANK OF PAKISTAN.

Main Branches of: (1). Parachiner, (2). Saddar Bazar and Tehkal Payan of Peshawar.

- (3). Nowshera Cantt, Mardan, Teshil Bazar Charsadda and Swabi.
- (4). Malakand, Mingora, Shangla, Chitral, Timergara and Daggar.
- (5). D.I. Khan, Bannu City, Karak, Tank, Kohat and Lakki Marwat.
- (6). Abbottabad, Haripur and Manshehra.



(Abdus Salam)

Director Recruitment

NWFP Public Service Commission,  
Peshawar. Phone: 091-9211295

**IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

*Muhammad Husain* *1/5* *Part of EDC*

In re-Service Appeal No 1562/2019

**Rejoinder on behalf of the appellant**

**On Preliminary Objections:**

All the preliminary objections are wrong, incorrect, misleading and misconceived, hence denied.

**On Facts:**

1. Para No "1" of the comments needs no reply.
2. Para No "2" of the comments needs no reply.
3. Para No "3" of the comments is wrong and incorrect, while that of the appeal is correct, hence denied.
4. Para No "4" of the appeal is admitted to be correct, hence needs no reply.
5. Para No "5" of the comments is wrong, incorrect and misleading, hence denied.
6. Para No "6" of the appeal is admitted to be correct, hence needs no reply.

**On Grounds:**

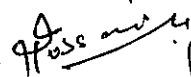
- a. Para "a" of the comments is wrong and incorrect, while that of the appeal is correct, hence denied.
- b. Para No "3" of the comments is wrong and incorrect, while that of the appeal is correct, hence denied.
- c. Para No "3" of the comments is wrong and incorrect, while that of the appeal is correct, hence denied.
- d. Para No "3" of the comments is wrong and incorrect, while that of the appeal is correct, hence denied.

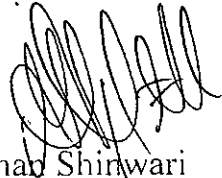
e. Para No "3" of the comments is wrong and incorrect, while that of the appeal is correct, hence denied.

f. Needs no reply.

It is, therefore, prayed that the title service appeal may kindly be allowed as prayed for.

Through

  
Appellant,

  
M Ayub Khad Shirwari  
Advocate Supreme Court

#### Affidavit

I, Irshad Hussain S/o Ashiq Hussain, Ex-Subject Specialist (Statistics), Govt Shaheed Nadeem Hussain Higher Secondary School, Shalozan, Kurram Agency do hereby solemnly affirm and declare on oath that the contents of the instant rejoinder are true and correct to the best of my knowledge and belief and nothing is concealed from this Honorable Tribunal.

  
Deponent

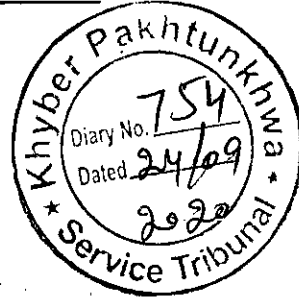
**BEFORE THE HONORABLE CHAIRMAN SERVICE TRIBUNAL KPK PESHAWAR**

*Put up to the court with relevant app.*

CM \_\_\_\_\_/2020

In

Service Appeal No.1562/2019.



*IRSHAD HUSSAIN*

VERSUS

GOVERNMENT & ETC.

**APPLICATION FOR DEPOSITING OF CHALAN / REGISTRY FEE, FOR CONVEYANCE OF SERVICES OF THE RESPONDENT.**

Respectfully Sheweth.

Applicant / Appellant Most Humbly submit has below:

1. That above service appeal being preferred on behalf of the applicant / appellant before this Honorable Tribunal, which is further fixed for hearing on 04.11.2020.
2. That vide order dated 14.07.2020, this Honorable Tribunal, passed an order to the applicant / appellant to deposit certain require amount for the conveyance of services of the respondents **But** due to the current disaster of Corona Virus (Coved -19), applicant / appellant was obviously unable to avoid the above order of this Tribunal, as retained in his actual residencies out there at Para Chinar Region.
3. That on 15.09.2020, this Honorable Tribunal again passed the same order of depositing of the certain amount for the smooth services of the respondent but the same again cannot be avoid by the applicant / appellant due the sole reasons that applicant came there from the Para Chinar Region to Peshawar today.
4. That the delay so accrued on the part of the applicant / appellant was neither intentional nor deliberate but due to the reasons stated above, therefore require mercy of this Honorable tribunal for its compliance on this belated stage.

*3 chances. Shall come up a/w appeal on the date already fixed.*

*In 20/9*

*Readu*



It is therefore most humbly prayed that on acceptance of this application the applicant / appellant may be allowed to deposit the requisite amount for the conveyance of the services of the respondents in the case.

*A. Hussain*  
24/9/20

APPLICANT / APPELLANT  
IN - PERSON

0306-8028175  
0321-9068514

AFFIDAVIT

Do hereby solemnly declare on oath that whatever stated in the contents of the above application, are true and correct to the best of my knowledge and belief, nothing stated false or concealed from this Honorable Tribunal.

*W. Khan*  
24/9/20  
ATTESTED  
WALI KHAN MOHMMED  
Oath Commissioner  
Advocate High Court  
Peshawar

*A. Hussain*  
24.9.20

DEPONENT