

# FORM OF ORDER SHEET

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

Case No. - \_\_\_\_\_

984/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	03/05/2023	The appeal of Mr. Khan Bacha resubmitted today by Mr. Muhammad Irshad Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on-

By the order of Chairman

  
REGISTRAR

The appeal of Mr. Khan Bacha son of Sher Hasan s/o Bagh-e-Irum District Mardan received today i.e. on 19.04.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1- Page nos. 04, 11, 12, and 19 to 24 are illegible which may be replaced by legible/better one.

No. 1234 /S.T.

Dt. 19.4 /2023.



REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Muhammad Irshad Adv.  
High Court, Mardan.

*Resubmitted after completion*

*3/5/23*

*3.5.2023*

# Before The Service Tribunal, Peshawar

Service Appeal No. 984 /2023

Khan Bacha

Versus

The Govt of KPK & others

Appeal

Index

s. no	Description of documents	Annex	pages
1.	Appeal		1-2
2.	affidavit		3
3.	Copy of appointment orders	"A"	4-15
4.	Copy of representation/appeal	"B"	16-25
5.	Copy of impugned order	"C"	26-27
6.	Wakalatnama		28

Dated 18/04/2023

  
Appellant

Through counsel

  
Muhammad irshad

Advocate

High court Peshawar

Cell# 03438567931

mirshadhumraz@gmail.com

# Before The Service Tribunal, Peshawar

Service Appeal No. 984 /2023

Khan Bacha S/O Sher Hasan R/O Bagh-e-Irum Tehsil & District  
Mardan.

.....Appellant

**Versus**

The Government of KPK through,

1. The Secretary Education Civil Secretariat Peshawar, K.P.K.
2. Director Education GT Road Peshawar near Hastnaghri Peshawar.
3. District Education Officer (Female) Mardan near PRC Mradan.

.....Respondants

**Appeal under section 4 of The service Tribunal Act, 1974 against the orders of the DEO (F) by not enlisting appellant in the seniority list along with all back service benefits where in appellant was appointed vide order 8720-29 dated 09/08/2010 and then adjusted / reappointed vide endst no 3471/G dated 05/04/2018. That the appellant filed departmental appeal before DEO (F) on 23/12/2022 which is still pending without disposal.**

**Prayer in Appeal:-**

**That the appellant may please be placed and given back service benefits like Seniority increments etc in light of appointment order Endst 8720-29 dated 09/08/2010 and seniority may please be ordered in accordance with merit as appellant was appointed in the year 2010.**

Respectfully Sir,

Appellant submits as under

1. That the Appellant was appointed in the year 2010 as class-IV and was posted to GPS Azam killi.
2. That the appellant's appointment order was malafidely withdrawn on the ground of adjustment.
3. That the appellant was adjusted vide endst no 3471/G dated 05/04/2018.
4. That the respondents issued seniority list where in appellant was not placed according to the appointment order endst no 8720-29 dated 09/08/2010.
5. That Appellant was aggrieved from the order of respondent no 3 moved an application in shape of departmental appeal before DEO (F).
6. That the appellant's appeal is yet to be decided while the same was filed on 23/12/2023 hence the present service appeal.
7. That the impugned order is illegal, unjustified and against the principles of naturel justice. Hence, the same is liable to be set-aside on the following amongst many other grounds:-
  - A. That the respondents had no authority to place present appellant in the list junior while he is senior, Hence, the respondents has acted beyond its authority, by recommending the juniors to appellant in service and managed them senior in the list.
  - B. That the impugned order passed is not maintainable as the list is not prepared under the relevant rules.
  - C. That the whole of the proceedings were carried-out in utter disregard to the relevant rules.
  - D. That the Appellant is not provided the right of defense, under the law and he is condemned unheard.
  - E. That Appellant seeks leave of this Honorable Tribunal to claim further grounds also.


It is prayed that on acceptances of this Appeal, the impugned order may be set aside and the Appellant may be ordered in the seniority in accordance with the appointment order edst no 8720-29 dated 09/08/2010 with back service benefits. Any other remedy which this honorable Tribunal deems proper and fit may also be awarded to the appellant.

Date:- 18.04.2023

Appellant

(Khan Bacha)

Through:-

M. 

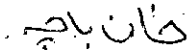
Muhammad Irshad

Advocate High Court


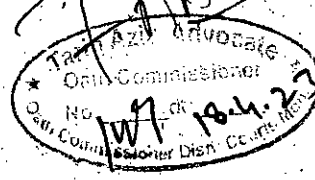
at Mardan

Affidavit:-

I, Khan Bacha / the Appellant do hereby state on Solemn affirmation that the contents of this Appeal Are true and correct to the best of my knowledge And belief.

  
Deponent:

(Khan Bacha )

Annex 'A'

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY AND SECONDARY  
EDUCATION MARDAN

OFFICE ORDER

Consequent upon the recommendations of the District Selection Committee the following appointments are hereby made against the vacant posts in BPS-I Rs.(2970-90-5670) as detailed below in the public interest on the following usual terms and conditions.

Retired Quota

S No	Name	Father name	D.O.B	Address	Domile	School Where Appointed
1	Khan Farha	Sher Hassan	1980	Boyl I Iran	Mardan	GPS Azam Killi
2	Zahid Zaman	Sher Zaman	31.01.1985	Barambah	Mardan	Chowkidar GGPS Sher Hassan Killi
3	Mhayat Ullah	Khanmullah	24.03.1975	Kallang	Mardan	Chowkidar GPS Gul Mira
4	Suliman Shah	Said Karam	25.01.1985	Sara Shah	Mardan	Chowkidar GGPS No.2 Mardan Khass
5	Syed Zahid Shah	Said Kiramal Shah Bacha	10.08.1969	Petao Malandari	Mardan	Beshli GHS Pir. Abad
6	Riaz Ahmad	Amir Bahadar	1972	Blatta Jandard	Mardan	Chowkidar GGPS Gul Ahmad Killi
7	Gul Malik	Abdul Malik	1975	Moh Band	Mardan	Chowkidar GPS Petao Malandari
8	Intihab	Razi Shah	1979	Petao Malandari	Mardan	L/Attend GHSS Mayar.
9	Mallab Shah	Nasrin Shah	07.01.1972	Faqir Shah Koley Rustan	Mardan	
10	Muhammadi Inuran	Rahim Ullah	1980	Kallang	Mardan	

TERMS AND CONDITIONS

- He shall for all intents and purposes, be Civil Servant except for purpose of pension or gratuity. In lieu of pension and gratuity, he shall be entitled to receive such amount contributed by him towards Contributory Provident Fund(C.P.F) along with the contributions made by Govt. to his accounts in the said fund in the prescribed manner.
- He shall be governed by the Civil Servants Act 1973 all the laws applicable to the Civil Servant and Rules made there under.
- He shall initially, be on probation for a period of one year extendable for a further period up to another year.
- His service shall be liable to termination at any time without assigning any reason thereof - before the expiry of period of probation, if his work during this period is not found satisfactory. In such an event he shall be given a months notice of termination from service or one months pay in lieu thereof. In case he wishes to resign at any time, a months notice shall be necessary or in lieu thereof a months pay shall be forfeited.
- He shall produce medical fitness certificate from the Medical Superintendent, DHQ Hospital Mardan as required under the Rules.
- Their age is not less than 18 to 35.
- The Post at which the pay cannot be withdrawn, the appointment order should be automatically canceled. If the above terms and conditions of appointment are acceptable to him, he should report for duty in the office of Executive District Officer Elementary and Secondary Education Mardan within 15 days against the existing vacancy.

(Bahadar Khan Marwat)  
Executive District Officer  
E/S Education Mardan

8720-29 Dated 9/8/2010  
Endst No: \_\_\_\_\_

- Copy of the above is forwarded for information and necessary action
- 1- Director Elementary and Secondary Education NWFP Peshawar
  - 2- Executive District Officer E/S Education Mardan
  - 3- District Accountant Officer Mardan
  - 4- District Officer (Male & Female) E/S Local Office
  - 5- Principal/Head Master Concerned
  - 6- Deputy District Officer Male and Female Mardan and Local Office
  - 7- ADO (E) Local Offices
  - 8- HM GPSA/GPS Concerned
  - 9- Budget and Accountant Officer Local office
  - 10- The Candidates Concerned

Endst. No. 2658/G dt. 20/09/2010.

Forwarded to all concerned for information & n/a, please.

Dy. Distt. Officer  
(M) P. T. Shah-Bhal

Executive District Officer  
E/S Education Mardan

5

کارڈ نمبر

منشی خان باجوہ لاہور کے لیے آئی ڈی نمبر 2010-2011

بھارتی ریاست کے لیے آئی ڈی نمبر 2010-2011

کوڈ نمبر 8720-28

ایم ایڈو (ESE) مردان

کارڈ نمبر

کارڈ نمبر

Head Master  
Govt. Primary School  
Mardan

فائن نمبر



6

MEDICAL CERTIFICATE

Form No. 1

Name of official P. L. V. G.

Caste or race \_\_\_\_\_

Father's name W. P. S.

Residence W. P. S. 1914

Date of birth 15/10/1980

Exact height by measurement 5-6

Personal mark of identification wound mark on R leg

Signature of the official \_\_\_\_\_

Signature of head of office \_\_\_\_\_

Seal of office \_\_\_\_\_

I do hereby certify that I have examined Mr. P. L. V. G. a candidate  
for employment in the Office of the Edcc  
and cannot discover that he had any disease communicable or other constitutional affection or bodily  
infirmary except \_\_\_\_\_

I do not consider this as disqualification for employment in the office of the W. P. S.  
His age according to his own statement 30 year and by appearance about  
year \_\_\_\_\_

*Medically fit for the job.*



LEFT HAND THUMB AND FINGER IMPRESSIONS

16/8/81

*[Signature]*  
MEDICAL SUPERINTENDENT,  
CIVIL HOSPITAL  
*Medical Superintendent  
Hospital*

سرمد صاحب ذہنی دستخط (مہاراجہ صاحب) کے نام سے  
جو سہ ماہی اسکول وقت سہ ماہی

جانب عالی  
گورنمنٹ پرائمری اسکول - آریہ سہ ماہی (پروفیسر میری تعیناتی نسبت جو کھار  
کے پتہ پر لکھی ہے) (آریہ سہ ماہی) (EDO مردان) کو  
9-8-2010

اسکول خڈا کے پرنسپل صاحب سے جانچنے کے لئے  
8/9 کو باقاعدہ جاننے کے لئے

16/8 کے ڈیوٹی شروع کی ہے۔ 21/8 تک پھر اسکول باقاعدہ کھلے گا۔  
20/8

اس دوران اسکول خڈا کے پرنسپل صاحب سے پتہ چلا ہے کہ  
اسکول خڈا میں جو کھار پرنسپل میری تعیناتی سے پہلے 5-6 دنوں کے لئے

خڈا میں جا کر پتہ چلا ہے کہ میری تعیناتی سے پہلے اسکول خڈا میں  
ڈیوٹی انجام نہ رہے۔ آریہ سہ ماہی اسکول میں ہے۔

آریہ سہ ماہی کو ضروری کارروائی کے لئے درخواست کی جا رہی ہے۔

(فقوہ زبیر آریہ)

مردان  
20-9-2010

السلامتہ

مہاراجہ صاحب ذہنی دستخط کے نام سے  
Forwaded to the DDO (S) (S) (S)  
Bhai for copy please  
دستخط میری

Principal  
Govt Primary School  
Sahayya

دستخط جو کھار

خان صاحب

21/9/10  
 Govt. Primary School  
 Head Master  
 Asan Kham  
 The school is now open for the new session. We are happy to have you back. Please contact me if you have any queries.

21/9/10  
 The school is now open for the new session. We are happy to have you back. Please contact me if you have any queries.

21/9/10  
 The school is now open for the new session. We are happy to have you back. Please contact me if you have any queries.

گورنمنٹ پرائمری اسکول ایف. ایف. ایف. 13/155 اور ایف. ایف. ایف. 2333

# رجسٹر حاضری مدرسین جامعہ اسلامیہ

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**تسلیم شد**  
**پیر 20/10/2019**

دستخط مدرسین  
 امین گل

گورنمنٹ پریس پناور جلیاں پسر A/31/555 اڈ آرٹیکل ایجوکیشن تعداد 23324

# جسٹر حاضری مدرسین لائل پور اسمتھ لائٹس

نام و نمبر	ستمبر		اکتوبر		نومبر		دسمبر		تاریخ آمد
	روایتی	دستخط	روایتی	دستخط	روایتی	دستخط	روایتی	دستخط	
MIR 0700	7/	7/	7/	7/	7/	7/	7/	7/	1
MIR 0700	7/	7/	7/	7/	7/	7/	7/	7/	2
MIR 075	7/	7/	7/	7/	7/	7/	7/	7/	3
MIR 125	7/	7/	7/	7/	7/	7/	7/	7/	4
C/leave									5
C/leave									6
MIR 12/5	7/	7/	7/	7/	7/	7/	7/	7/	7
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- E I D - D A Y # E I D - D A Y									9
MIR 12/5	7/	7/	7/	7/	7/	7/	7/	7/	10
MIR 12/5	7/	7/	7/	7/	7/	7/	7/	7/	11
MIR 12/30	7/	7/	7/	7/	7/	7/	7/	7/	12
MIR 11/30	7/	7/	7/	7/	7/	7/	7/	7/	13
C/leave									14
Do									15
MIR 12/5	7/	7/	7/	7/	7/	7/	7/	7/	16
MIR 0710	7/	7/	7/	7/	7/	7/	7/	7/	17
MIR 12/5	7/	7/	7/	7/	7/	7/	7/	7/	18
MIR 11	7/	7/	7/	7/	7/	7/	7/	7/	19
MIR 12/5	7/	7/	7/	7/	7/	7/	7/	7/	20
MIR 12/5	7/	7/	7/	7/	7/	7/	7/	7/	21
MIR 7/	7/	7/	7/	7/	7/	7/	7/	7/	22
C/leave									23

Handwritten notes: 2/9/10, ABC, 2/11

ست	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
	5	6	11	2	11	13	3	7	10

Handwritten signature and notes at the bottom of the page.

Vertical text on the left margin: لاہور کے لیے ایک



OFFICE OF THE EXECUTIVE DISTRICT OFFICER  
ELEMENTARY & SECONDARY EDUCATION, MARDAN

(u)

OFFICE ORDER

The appointment Order issued vide this office under Endorsement No.8/20-29 dated 09.08.2010 in respect of the following C-IV in the Retired Quota are hereby held in a Abeyance till further Order.


S.No	Name	F/Name	Address	Name of school Where Appointed
1	Khair Bacha	Sher Hossan	Baghe Haram, Mardan	Chowkedar GPS Azam Kili
2	Zahid Zaman	Sher Zaman	Bakhshiali	Chowkedar GPS Sher Hossan Kili
3	Nihayat Ullah	Khani Mulla	Katlang	Chowkedar GPS Gul Marra
4	Sulaiman Shah	Said Karam	Saro Shah	Chowkedar GPS Ghundo
5	Syed Zahid Shah	Syed Kiramat Shah	Fatam Korona	Chowkedar GPS No. 2001
6	Riaz Ahannad	Ameer Bahadar	Matah Jadeed	Beheshiti GPS Piri Abad
7	Gul Malik	Abdul Malik	Moti Banda	Chowkedar GPS Jangra Bharat Khel
8	Intikhab	Razi Shah	Pitawo Malandari	Chowkedar GPS Gul Ahmad Kili
9	Mattali Shah	Muhammad Shah	Faqeer Shah	Chowkedar GPS Pitawo Mahandari
10	Muhammad Imran	Rahim Ullah	Katlang	L/Attend GISS Mayar

(Bahadar Khan Marwan)  
Executive District Officer,  
(E. & S.E.) Mardan

Endst: No. 10328-29 Dated. 28.9.2010

Copy forwarded to the:-

1. DCO Mardan
2. DAO Mardan
3. Principal HMI Concerned.
4. Dy. DO (M) & (F) in District Mardan.
5. Candidate Concern.

  
Executive District Officer,  
(E. & S.E.) Mardan

12

No. 2784 P.No.P.F. Khan Bache Chowk. Date: 22/9/2010.  
From,

The Dy. Distt. Officer (M)  
Education Takht Bhai.

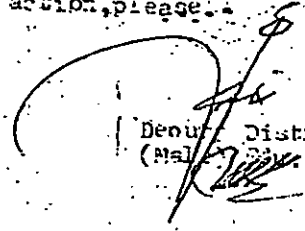
To,

The Executive District Officer  
Elementary & Secy: Lda: Mardan.

Subject:- APPLICATION FOR ADJUSTMENT.

Memo:-

Kindly refer to the above noted subject and to  
enclose herewith an application which is self explanatory,  
in r/o of Khan Bache Chowk. GPS Asam Killa (Takht Bhai)  
for favour of further necessary action, please.



Deputy District Officer  
(Mal. Secy: Takht Bhai.

13

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MARDAN**

**Notification**

Consequent upon the approval given by the Departmental selection committee, in the meeting held on 02.04.2018 the following candidates are hereby appointed against 25% retired quota in BPS-03 (Rs=9610-390-21310) per month plus usual allowances in the schools noted against each Vacant C-IV posts with the terms and conditions given below with immediate effect in the interest of public service.

S No	Name/Father Name	Address	School where appointed	PK	Remarks
1	Mr: Khan Badsha/Sher Hassan	Par Hoti	GGPS, Haji Akbar Koroonah	25	AVP, Chowkidar
2	Mr: Rahman Gul/Murad Ali	Abdul Rahman Killi	GGPS, Azi (hal)	24	AVP, Chowkidar
3	Mr: Muhammad Arif/Hussain Khan	Manduri Afzal Abad	GCMHSS Katlang	29	AVP, Chowkidar

**Terms & Conditions**

1. Their Services will be considered regular but without pension & Gratuity in terms of Section-19 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 as amended vide Khyber Pakhtunkhwa Civil Servants (Amendment) Act, 2005
2. They should join their posts within 15 days of the issuance of this Notification. In case of failure to join the post within 15 days of the issuance of this notification, their appointment will expire automatically and no subsequent appeal etc shall be entertained.
3. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
4. Charge report should be submitted to all concerned.
5. DDO concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise
6. Their age limit for the above posts is 18-40 years.
7. They will produce Health and Age Certificate from the M/S of D.H.Q Mardan.
8. Their pay will be released after the verification of their documents by the concerned DDO.
9. Their services can be terminated at any time in case of their performance is found unsatisfactory. In case of misconduct their will be proceeded under the rules framed from time to time.
10. Their services are liable to termination on one month prior notice from either side. In case of resignation without notice, one month pay/allowances shall be forfeited to Government
11. No TA/DA will be allowed to the appointee for joining his duty.

(SAMINA GHANI)  
DISTRICT EDUCATION OFFICER  
(FEMALE) MARDAN

Enst: No. 3471/9

Dated 5/4/2018

Copy forwarded to:

1. Director E & S Education Khyber Pakhtoonkhwa, Peshawar.
2. District Account Office Mardan Mardan
3. Accountant local Office
4. SDEO(F) Mardan/Takht Bhai/Katlang
5. Head Mistress/Head Teacher/GGHS/GGMS/GGPS Concerned.
6. Offical Concerned.

(SAMINA GHANI)  
DISTRICT EDUCATION OFFICER  
(FEMALE) MARDAN



14

MEDICAL CERTIFICATE

No-1722/045

Name of Official: Khan Bahe 10107-0640848-8

Caste or Race: Afghan

Father's Name: Shah Hasan

Residence: Shamilet K. Li PO Por Vohi

Mardan

Date of Birth: 15-10-1980 (the 1st time)

Exact Height by measurement: 5-9

Exact mark of Identification: \_\_\_\_\_

Signature of the Official: \_\_\_\_\_

Signature of the Head of Office: \_\_\_\_\_

Seal of Office: \_\_\_\_\_

I do hereby certify that I have examined Mr. Khan Bahe for employment in the office of the DEO (F) Mardan and cannot discover that he had any disease communicable or other constitutional affection or bodily infirmity except NK

I do not consider this is disqualification for employment in the office of the above as Chartered BPS-03 his age according to his own statement 37 year and by appearance about year thirty seven years



LEFT HAND THUMB AND FINGER IMPRESSION

[Signature]  
13/04/2018  
Medical Superintendent,  
DHQ Hospital, Mardan.  
Medical Superintendent  
D.H.Q. Hospital, Mardan.

Dated 13-04-2018

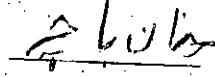
**CERTIFICATE OF TRANSFER OF CHARGE**

Certified that I have on the fore-noon of this day respectively receive charge of my Chowkidar post at Office of the Headmistress , Govt: Girls Prv : School Haji Akbar Koroona Mardan . vide DEO (Female) Mardan endst NO:3471/G dated 05.04.2018.

Dated: 13.04.2018 (FN)

Signature of receiving: (Mr: Khan Bacha )

Govt: Servant .



Designation : Chowkidar

**OFFICE OF THE HEAD TEACHER GGPS HAJI AKBAR KOROONA MARDAN .**

Endst: No. \_\_\_\_\_ /P.File MR: Khan, Bacha Chowkidar GGPS Haji Akbar Koroona Mardan

Copy of the above is submitted for information to the :

- 1: District Education Officer ( F ) Mardan.
- 2: District Comptroller of Accounts, Mardan.
- 3: P/File.

  
 18/4/18  
 Nosheen Saba  
 ASDEO (Female)  
 Male Shahbaz Garhi Marda

Annex "B" (16)

For Station RGL105083208 Ps. 50  
RAD01249245 50  
the initial weight 100  
Post Office Guide or on which no  
acknowledgment is due  
Received a registered\*  
Addressed to \_\_\_\_\_ Date-Stamp \_\_\_\_\_  
\*Write here "letter", "postcard", "packet" or "parcel"  
Initials of Receiving Officer \_\_\_\_\_ with the word "insured" before it when necessary.  
Insured for Rs. (in figures) \_\_\_\_\_ (in words) \_\_\_\_\_  
Insurance fee Rs. \_\_\_\_\_ Weight \_\_\_\_\_ Kilo \_\_\_\_\_  
Name and address of sender \_\_\_\_\_ (in words) \_\_\_\_\_  
BOOKING

RP-54

## رسید

رجسٹری یا بیمہ بھیجنے والے کو پشت پر دیئے گئے پتہ پر واپس بھیجا جائے۔

★ ایک رجسٹری نمبر \_\_\_\_\_  
برائے (نام) \_\_\_\_\_ DEO (F) سردار نبرد PRG حیدر آباد وصول پائی۔

• بیمہ کی مالیت \_\_\_\_\_ • وزن (لٹروں میں) \_\_\_\_\_ گرام

مکتوب الیہ کے دستخط \_\_\_\_\_  
تاریخ تقسیم \_\_\_\_\_

★ یہاں چٹھی "پوسٹ کارڈ" "پیکٹ" یا "پارسل" جو چیز ہو تحریر کریں۔ بیمہ کی صورت میں لفظ "بیمہ" پہلے تحریر کریں۔  
• صرف بیمہ کی صورت میں یہاں اندراج کیا جائے۔ بصورت دیگر کات دیا جائے۔

رجسٹریشن فیس تیس روپے -/30 Rs.

قیمت: بیس روپے -/20 Rs.

حضرت صاحب دستخط اور نوشتن آئینہ میل جرداں

درخواست سراد عطا علی بنیاد جا انٹرنیشنل وغیرہ دوزخ کرانے  
سائل عطا علی اور انٹرنیشنل آف آرڈر 29-8720 حوزہ 2010/8/9  
در سیارٹی لسٹ

بہاں عالی! درخواست سائل ذیل سرہا ہے

1- یہ سائل کا والد قلم میں بطور طویلہ ارنیٹ تھا جو

حوزہ 2002-01-14 کو ریٹائر ہو گیا ہے

2- یہ سائل کو سائل 2010 میں سن Quota سے ماوردے

Endot No 8720-29 dated 9/8/2010 بطور جو کتا رکھتی تھوا۔

3- یہ قلم کے EDO کو D.D.O نے ایک

درخواست سراد Adjustment دی جو 2784

حوزہ 2010/9/28 کو تھوا۔

4- یہ سائل نے مذکورہ آرڈر پر باقاعدہ قلم

کرنے جا رہا ہوئے داخل کرنے باقاعدہ تھوا

جس کے ذریعے اس کا تھانے اس دوران سائل

کا تعیناتی اس بنیاد سراد اس تھانے آپ کو

Adjust کرتے ہیں

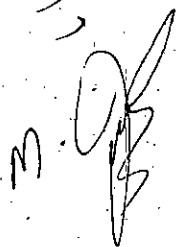
5- یہ سائل کو دوبارہ Adjust کرنا

گیا کہ سب سے پہلے کو نہ تو سب سے پہلے دیکھا گیا نہ ہی اس  
 انگریزوں کی دیکھی اور نہ ہی اس کے ساتھ جو  
 سب سے پہلے ہی حقوق متاثر ہوئے تھے وہ مسلم  
 حقوق کے لیے سب سے پہلے تھے

۱۰۔ یہ ہے کہ اس کی خدمت میں درخواست ہے کہ سب کو  
 متعلقہ Back Benefit کے ساتھ انگریزوں  
 و سب سے پہلے متعلقہ 2010ء کی سب سے پہلے فراہم  
 کرنے کے امکانات کا درجہ

لہذا اس کے لیے منظور کی درخواست ہے  
 سب سے پہلے کو سب سے پہلے، انگریزوں و دیگر متعلقہ  
 قانون مع Back Service Benefit فراہم کرنے  
 کے امکانات کا درجہ

19/12/2022



خان صاحب  
 نگران امور

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MARDAN

LIST OF 25% RETIRED SON'S QUOTA

7	Name	F/Name	D.O.B	Name of School	Retired on	U/C	PK	Domicile	Committee Remarks
1	Abdul Wahab	Abdul Mastan	02.02.1981	GGPS Taj Abad	13.06.1998	Babuzai ktg	29	Mardan	Appointed
2	Sultan Ali	Jandad Khan	25.12.1988	????????	12.03.2000	Surkh Dheri	30	Mardan	Appointed
3	Basirat	Shad Muhammed		GGCMHSS Canal Road	30/4/90	Mardan	24	Mardan	Appointed
4	Khan Badsha	Sher Hassan	15.10.1980	GGHSS NO 1	14.01.2002	Par Hati	24	Mardan	Appointed
5	Farman	Sofeer	16.05.1977	GGPS Shehdad Babe	04.01.2003	Mardan	30	Mardan	Appointed
6	Ishaq	Ajamat Khan	30.08.1987	GGHS Hatian	18.09.2006	Hatian	27	Mardan	Appointed
7	Rehman Gul	Murad Ali	05.02.1997	GGPS Abdul Rahman ARI	20.06.2006	Aman Killi T Shai	26	Mardan	Appointed
8	Sajid Khan	Faiz Gul	1978	GGHS Shehdad Babe	01/11/06	Mardan Gulistan	30	Mardan	Appointed
9	Muhammad Amir	Muhammad Khan	1978		1/7/07	Umar Abad	29	Mardan	Appointed
10	Khan Akbar	Noor Akbar	23.08.1974	GGHS Hatian	31.12.2004	Hatian	55	Mardan	Appointed
11	Imran Ahmad	Sujad Ahmad	18.03.1988	NEO (M/F) Mardan	31.07.2005	Bikat Gunj	53	Mardan	Appointed
12	Abdul Hamid	Said Ghawas	01.01.1989	GGPS Rud Seri	02.09.2005	Garni Kapoora	51	Mardan	Appointed
13	Abid Inqilab	Abdul Jaber	24.06.1983	GGHS No.1 Mardan	15.06.2007	Mirwas	30	Mardan	Appointed
14	Rahim Dad	Fairad Khan	01.05.1982	GGPS Khoksar Mazil	10.02.2008	Hati	23	Mardan	Appointed
15	Muhammad Ali	Muhammad Khan	15.09.1988	GGHS NO 01 Sher Gumb	14.06.2008	Sher Gumb		Mardan	Provide documents on dated 24.3.2021
16	Abdul Karim	Azam Khan	01.01.1988	GGHS Hatian	30.06.2008	Hatian	34	Mardan	Reject due Pre-mature.
17	Nihayat Begum	Noorina	15.12.1974	????????	31.02.2010	Taru		Swabi	Reject due Other District
18	Shahid Ali	Bahadar Khan	05/04/1985	????????	2/4/10	Saleem Abad	30	Mardan	Appointed
19	Muhammad Ali	Shahid Khan	01.01.1988	GGHS Hatian	16.05.2010	BABER	30	Mardan	Appointed
20	Muhammad Ali	Muhammad Khan	15.09.1988	GGHS NO 01 Sher Gumb	14.06.2008	Sher Gumb		Mardan	Appointed
21	Muhammad Ali	Muhammad Khan	15.09.1988	GGHS NO 01 Sher Gumb	14.06.2008	Sher Gumb		Mardan	Appointed
22	Usar Ali	Sahib Zado	01.01.1990	GGPS Umar Abad	31.12.2010	Umar Abad	29	Mardan	Appointed
23	Said Mohammad		01.01.1989	GGPS Anwar Khan Killi	28.03.2010	Pir Abad	26	Mardan	due to submission application after conducting DSC meeting.
24	Sadiq Ali	Alif Khan	20.03.1987	GGPS Bilandi Katlang	02.05.2011	Katlang	29	Mardan	Appointed

7	Name	F/Name	D.O.B	Name of School	Retired on	U/C	PK	Domicile	Committee Remarks
25	Abdul Jalil	Abdal Muhammad	01.04.1984	GGHSS Toru	26.03.2011	Toru	24	Mardan	Appointed
26	Rizad Kamal	Muhammad Kamal	1982	GGHSS Gujrat	01.10.2011	Gujrat	30	Mardan	Appointed
27	Ijaz Ahmad	Amir Gul	01/01/1983	GGPS Shah Dhand L/Khawar	15.10.2011	L/Khawar	55	Mardan	Due to submission application after conducting DSC meeting.
28	khuzifa	Khawas Khan	01.03.1991	GGHS Kohi Barmal	20.11.2011	Kohi Barmal	28	Mardan	Appointed
29	Gulzar Un Din	Raham Un Din	08.04.1993	GGHS Baghicha Dheri	05.01.2012	Baghicha Dheri	25	Mardan	not available on has postal adress in school
30	Munreb Gul	Faqir Gul	12.03.1999	GGPS NO 1 Palo Dheri	07.02.2012	Palo Dheri	29	Mardan	Appointed
31	M Talmaar	Muhammad Israr	04.03.1961	GGPS Boba Mohala	10.02.2012	Hoti	23	Mardan	Appointed
32	Irfan Khan	Shamsur Rehman	06.08.1984	GGHS Moyer	10.02.2012	Hoti	30	Mardan	Appointed
33	Asad	Fazie Akter	03.04.1992	GGHS Baghicha Dheri	08.04.2012	Baghicha Dheri	25	Mardan	not available on has postal adress in school
34	Ahmad Ali	Misal Khan	05.03.1977	Jira Kaim Abad	01.06.2012	Lund Khawar		Mardan	Application submitted on dated 15.08.2022
35	Rezaq Ahmad	Isabir Ur Rehman	13.03.1985	GGPS Ruzfika Ruzki Dheri	07.07.2012	Zunra Dheri	35	Mardan	Appointed
36	Rauf Khan	Masroof Khen	20.10.1982	GGHSS NO 1	05.07.2012	Chial Bonda	24	Mardan	Appointed
37	Muhammad Qasim	Shakot Ali	12.07.2002	GGHSS Toru Mardan	10.10.2012	Toru		Mardan	application submitted on dated 22.09.2022
38	Asif Ullah	Zakir Ullah	01.01.1992	GGPS Daka baba	29.11.2012	Afzal Abad	26	Mardan	Appointed
39	Ranain Zeb	Wazir Badshah	15.05.1992	GGPS Garyal	29.10.2012	Garyala	50	Mardan	Appointed
40	Dostagir Khan	Ajmal Khan	10.01.1993	GGHS Ikrom Pur	31.12.2011	Ikrom Pur Kotlahq		Mardan	Documents submitted on dated 06.11.2021
41	Muhammad Dawood	Abdul Ghafoor	02.05.1997	GGPS Kandaal Khan Jandana	02.05.2013	Fazal Abad Talnt Eheri		Mardan	Application submitted on dated 30.04.2022
42	Imroz Hundi	Eawa Khan	05/02/1995	GGPS Khadi Kili	30/6/13	Khadi Kili	34	Mardan	Appointed as Deceased Son Quota
43	Ibrahim Khan	Baradin	12/02/1995	GGPS, Char Bonda Mardan	30/6/13	Bogh-e-ram	24	Mardan	
44	Muhammad Shafiq	Shereen Roche	05.03.01988	GGMS, Likpani	30/6/13	Dheri Likpani	28	Mardan	
45	Subir Ullah	Ali Hedi	04/02/1992	GGPS, Durray (T. Eheri)	30/6/13	Lund Khawar	26	Mardan	
46	Hashim Ali	Masroof Khan	11.01.1987	GGPS, Dandawa	01.01.2012	Talmt Eheri		Mardan	
47	Imroz Hundi	Gul Zameer	11/01/1995	GGPS, Durray (T. Eheri)	19/7/13	Durray (T. Eheri)		Mardan	0547 1515151
48	Muhammad Arif	Khan Echodor	15/02/1982	GGPS, Nowan Kili (Rustim)	25/10/13	Rustam	29	Mardan	
49	Hazrat Bilal	Hukam Khan	1.1.1993	GGPS, Hasham Abad	31/12/13	Toru	24	Mardan	
50	Noor Zada	Khan Zada	6.6.1984	GGPS, Petao Malandari	31/12/13	Petao Malandari	29	Mardan	

7	Name	F/Name	D.O.B	Name of School	Retired on	U/C	PK	Domicile	Committee Remarks
51	Niaz Ali	Murtaza Khan	02.04.1991	GGHS,Jalala	01.01.2014	Jalala	27	Mardan	
52	Fazil Akbar	Sher Bahadar	25.1.1996	GGPS,Pipal	28/2/14	Pipal(Katlang)	28	Mardan	
53	Attaullah	Ramdad Khan	27.03.1990	GGPS No.1.Toru	01.03.2014	Ghala Dher	24	Mardan	
54	Farhat Ullah	Karimullah	08.04.1997	GGPS Shah Dhand Baba	01.03.2014	Mardan	23	Mardan	
55	Shehnoz	D/O Perveen		GGHS, Gujar Gheri	16/4/14	T.B.Hospital	26	Mardan	
56	Mumlikat	Gul Toja	1.1.1985	GGHSKos Korona	31/5/14	Hati	24	Mardan	
57	Ikram Khan	Sardar Yousaf	28.3.1986	GGPS,Ihari(Hathian)	10/6/14	Hathian	27	Mardan	
58	Fazal Karim		20.4.1994	GGHS,Mian Khan	15/6/14	Mian Khan	28	Mardan	
59	Khalid Hussain	Aam Zeb	5.6.1984	GGPS,Lunara	20/6/14	Narsak	25	Mardan	
60	Yusuf Khan	Jamroz Khan	14.2.1984	GGPS,Ikrom Fari(Mardan)	29/6/14	Ikrom Fari Katlang	28	Mardan	
61	Samia	Ranani Inchi	09.09.1991	GGHS,Lund Khawar	30/6/14	Lund Khawar	27	Mardan	
62	Wazir Ahmad	Rahim Dad	4.1.1982	GGPS,Sangawa	30/6/14	Sangawa	28	Mardan	
63	Shah Fahad	Inayat Khan	01.01.1989	GGHS,Takht Bhai	30/6/14	Takht Bhai	26	Mardan	
64	Muhammad Dawood	Inayat Khan	20.4.1987	GGHS,Takht Bhai	1/7/14	Takht Bhai	26	Mardan	
65	Besraja Bibi	Zarif Jan	1.1.1986	GGHS,Ganjai(T/Bhai)	5/10/14	Ganjai T/Bhai	27	Mardan	
66	Said Ghani	Fazal Ghani	16.04.1989	GGPS,Kondar Cham Rustam	10/11/14	Rustam	29	Mardan	
67	Muhammad Shafiq	Aman Ullah	04.04.1990	GGPS,Sari Behlol	31/12/14	Sari Behlol	26	Mardan	
68	Fahat Bibi	Enkht Begum	14.03.1993	GGMS,Jari Hation	22.01.2015	Jari	27	Mardan	
69	Sayar Khan		01.01.1995	GGPS,Toru No 3	02.02.2015	Toru	24	Mardan	
70	Qobul ul Mulk	Muhammad Jaff Khan	19.01.1995	GGMS,Shuja Abed L/B	10.02.2015	Lund Khawar	27	Mardan	
71	Wazir Ali	Abzar Mohammad	06.12.1995	GGPS,Dunb Mavori	12.02.2015	Gash Mavori	24	Mardan	
72	Ali	Sardar Khan	15.02.1997	GGPS,Phawar	23.02.2015	Shah Elahi	24	Mardan	
73	Haris Ali	Indud Ullah	16.7.1997	GGPS,Phari No 2	01.04.2015	Hati	20	Mardan	
74	Hidayat Ali	Munir Khan	18.02.1990	GGPS,Sher Bahadar Kera	4/5/15	Sher Bahadar	30	Mardan	
75	Abdullah	Saboor Khan	01.01.1992	GGHS,kat jungara	25.05.2015	T/Bhai	26	Mardan	
76	Niaz Ali Khan	Hasmim Khan	04.04.1983	GGPS,Kandi Bakal Khel	30/06/2015	Bala Ghari	29	Mardan	



7	Name	F/Name	D.O.B	Name of School	Retired on	U/C	PK	Domecile	Committee Remarks
77	Muhammad Bilal	Shaji Rahman	22.02.1991	GGHSS Takht Bhai	30/06/2015	Takht Bhai	26	Mardan	
78	Mushtaq	Nasar Ali Khan	01.01.1991	GGPS Bijle Garh	30.06.2015	Mardan	23	Mardan	
79	Abass	Sikandar Khan	10.02.1992	GGHSS Takht Bhai	30.06.2015	Takht Bhai	26	Mardan	
80	Ziad Khan	Noor Muhammad	02.02.1986	GGPS Wana Khel	30.06.2015	Wana Khel	26	Mardan	
81	Imrad Ali	Sabz ali		GGPS Khawja Rashka	01.07.2015	Kwaja Rashka	24	Mardan	
82	Adil	Talob Din	06.03.1987	GGMS No.2 Baghdada	14.09.2015	Baghdada	23	Mardan	
83	Aziz Gul	Noor Gul	01.01.1986	DEC(F)Mardan	30.06.2015	Bunir		Bunir	
84	Zubair Ali Shah	Hashmatul Haq	15.01.1985	GGHE Gujer Ghori	30.11.2015	Gujer Ghori	25	Mardan	
85	Masood Gul	Yousaf Gul	11.04.1981	GGHS Qasmi	31.12.2015	Qasmi		Mardan	
86	Saima Begum	Ghani Akbar	16.03.1986	GGHS Qasmi	31.12.2015	Qasmi	28	Mardan	
87		Reza Khan	05.01.1986	GGPS Iqbal Khan T.E	01.11.2015	Boagh Khan I/Phel	50	Mardan	
88	Sadiq Ali	Alif Khan	1956	GGPS Shah Boigh	01.01.2016	Sheikh Yousof	53	Mardan	
89	Suleman Khan	Muhammad Hanayim	05.04.1997	DEC (Female) Mardan	20.01.2016	Shahbaz Garhi	53	Mardan	
90	Abdullah	Abdus Salam	05.03.1996	GGPS Janga	29.01.2016	Janga Baia	27	Mardan	
91	Muhammad Shazad	M Ismail	20.03.1992	GGHS Hoti.2	31.01.2016	Shamsi road	24	Mardan	
92		Bakht Sharif	1955	GGMS Goryala	01.02.2016	Goryala	50	Mardan	
93		Sher Afzar	20.02.1956	GGPS Tikadar Kalli	20.02.2016	Tikadar Kalli Toru	52	Mardan	
94	M. Awan	Shehzad In Khan	1980	GGPS Bughbansen	09.06.2016	T/Bhar	27	Mardan	
95	Abdul Jalil	Rezaamin	01.07.1956	GGPS Bhati Korona	30.06.2016	Sharij Abad		Mardan	
96	Munir Ali Shah	Milayati Shah	01.02.1985	GGPS Gulbahi Rustam	30.06.2016	Rustam	29	Mardan	
97	Munir Ullah	Amir Nawaz	01.02.2000	GGPS Shah Chandi Bala	01.08.2016	Shah Chandi Bala		Mardan	
98	Ali Khan	Amir Ali P	01.08.1977	GGPS Rustam Rustam	01.08.2017	Rustam		Mardan	
99	Ali Khan	Amir Ali P	01.08.1977	GGPS Rustam Rustam	01.08.2017	Rustam		Mardan	
100	Khizar Hameed	Amir Nawaz	1960	GGHS Shehband Baba	31.07.2019	Sheh Chandi Bala	30	Mardan	
101	Abid ali	Umara Khan	10/04/1994	GGCMHSS Katlang	30/09/2016	Mian Khan	29	Mardan	
102	Zakir Ali	Awaj Dad Khan	25.10.1991	GGMS Kot Takht Bhai	09.11.2016		26	Mardan	

52

7	Name	F/Name	D.O.B	Name of School	Retired on	U/C	PK	Domicile	Committee Remarks
103	Sajid Ali	Taati Gul	01.01.1989	SDEO (F) Takht Bhai	09.11.2016	Takht Bhai	26	Mardan	
104	asad ullah	Taj uddin	23.03.1999	GGHS Mayor	01.11.2017	Kumbar mayar	51	Mardan	
105	Sher Ali	Humayun Khan	25.03.1978	GGHSS Toru		Toru	24	Mardan	
106	AMIR Ullah	Zaheer Ullah	11.2.1984	GGHS Takkar	01.08.2017	Takkar	27	Mardan	
107	Muhammad Zarshad	Muhammad Irshad	01.03.1987	GGPS No 2 T.Bhai	01.09.2017	Muslim Abad T.B	26	Mardan	
108	Hamza Alo	Khan Muhammad		GGPS Azi Khel Hatr	31.12.2017	Chatoo Chowk		Mardan	0315-9284348
109	Asif Ali	Alam Zeb	12.01.1998	GGPS Hisar Bando No Q2	01.01.2018	Hisar Bando	27	Mardan	
110	Muhammad Kamal	Muhammad Saleem Khan	03.05.1997	GGPS Shaki Abad	07.01.2018	Lund Khawar	48	Mardan	
111	Ali Akbar	Haji Akbar	18.04.1989	GGPS Haji Akbar Karcana	01.02.2018	Gumapt	75	Mardan	
112	Muhammad Ibrahim	Kiramat Ali	15.04.1988	GGPS Kass Kolt Toru	30.06.2008	Toru	51	Mardan	
113	Umar Fardos	Firdos Khan	14.03.1992	GGPS Pazim Kili	30.06.2018	Kazim Kili	45	Mardan	
114	Nisar Muhammad	Hassan Muhammad	01.03.1987	GGPS Nancy Surang	01.07.2016	Pala Dheri	29	Mardan	

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115	Muhammad Asad Zia	Zia Ul Haq	SAJAD	SDEO (F) Mardan	30.06.2018	Shamsi Road	24	Mardan	
116	Said Badsha	Essa Khan	1981	GGPS Shikhno Banda	01.09.2018	Shikhno, Banda	48	Mardan	
117	Sajid Khan	Rahmadad Khan	28.03.1978	GGPS Mamin Khan Killi	31.12.2018	Mamin Killi Sher Garh	55	Mardan	
118	Haroon Rashid	Abdul Wahid	04.02.2000	GGPS Saraobi	31.12.2018	Saraobi	48	Mardan	
119	Mustafa	Malak Aman	03.03.1993	GGPS Mayor Mardan	17.02.2019	Mayor		Mardan	
120	Siroj Muhammad	Lal Muhammad		DEO (F) Mardan	30.03.2019	Bijle Garh	53	Mardan	
121	Esse Khan	Abdur Rashid	26.04.2001	GGPS Marghano Killi	30.04.2019	Farm Korona	53	Mardan	
122	Islam Rahim	Nasir Rahim	14.12.1993	GPS No 2 Ajo	30.06.2019	Ajo Kotlang	46	Mardan	
123	Sajjad Muhammad	Ziarat Gul	02.02.1984	GGPS Zoray Banda	01.07.2019	Zoray Banda	48	Mardan	
124	Nazeer Muhammad	Fazal Muhammad	1985	GGMS Kalo Shah	27.07.2019	Kalo Shah	48	Mardan	
125	Anwar Zhib	Muhammad Yaseen	05.02.1989	GGPA Berya Qadeem	04.09.2019	Per Hati	24	Mardan	
126	Dilawar Khan	Lal Muhammad Khan	10.06.1986	GGHS Shanker Maha	06.06.2020	Shanker		Mardan	
127	Abu Bakar	Faizand Ali	01.02.1997	GGHS Bala Garhi	30.06.2020	Shahbaz Garhi	50	Mardan	
128	Waqar Khan	Mukaram Khan	22.08.1995	GGHS Sanga	05.08.2020	Lund Khawar		Mardan	
129	Ayaz Ahmad	Sherin Muhammad		GGPS Rahmat Ullah Banda	31.12.2007	Jabbar Kotlang	54	Mardan	
130	Ilyas Ahmad	Mukhtar Yousaf	01.02.1983	GGPS Mian Schib Kalli	01.01.2021	Takht Ehai		Mardan	
131	Zainab Khan	C/C Zubida Beaum	18.02.2000	GGPS Eid Gakh Mardan	31.05.2000	Malak Abad Korogh		Mardan	
132	Tehseen Ullah	Aziz Ullah	12.07.1987	GGHS Shahbaz Garhi	30.06.2020	Rustam		Mardan	
133	Arshid Ali	Sankar Khan	02.01.1981	GGPS Sardar Aoud	01.07.2020	Rustam Polo Dheri		Mardan	application submitted on dated 15.09.2021
134	Arshid Ali	Atam Khan	26.02.1984	GGHS Jalala	04.03.2021	Takht Ehai		Mardan	
135	Tehseen Khan	Atam Khan	01.11.1989	GGHS Qaseena Rustam	30.06.2021	Rustam		Mardan	
136	Fah Ahmad	Dr. Fozia Farooq	07.12.1991	GGPS Ujani Gul Korona	30.06.2021	Lund Khawar		Mardan	
137	Abdullah	Fah Khan	01.11.1993	GGHS Gumbat	30.06.2021	Gumbat		Mardan	
138	Abid Khan	Muhammad Qadar	01.01.1988	GGMS Kalo Shah	18.10.2021	Lund Khawar		Mardan	
139	Fatma	Munir Khan	11.06.1992	GGHS Rustam Khel	31.12.2021	Hati		Mardan	
140	Amir	Mumtaz Bibi Behshi	06.07.1999	GGHS Kass Korona	26.01.2022	Canal Road	52	Mardan	

WAKALAT NAMA

**Before The Service Tribunal, Peshawar**

Service Appeal.No. \_\_\_\_\_/2023

Khan Bacha


Versus

The Govt of KPK & others

APPEAL

I/we petitioners/plaintiffs/defendants/respondents the above noted case do hereby appoint and engage **MUHAMMAD IRSHAD** ADVOCATE HIGH COURT as our / mine counsel in subject proceeding , and authorize him to appear plead ,etc, compromise, withdraw or refer the matter for arbitration for me/us, without any liability for his default and with the authority to engage/ appoint any other advocate/ counsel at our/my expense and receive all sums and amounts payable to us/me and do all such acts , which he may deem necessary for protecting our/my interest in the matter. He is also authorized to file the appeal, revision, review, and application for restoration or application for setting aside ex-parte decree/order /proceeding on my/our behalf .

Date 18/04/2023

Sign 

Appellant

*Muhammad Irshad Advocate .*

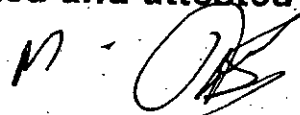
*High Court at district Bar*

*Association Mardan (K.P.K)*

*ID-BC-09-2340*

*CELL # 03438567931*

**Accepted and attested**



**Muhammad Irshad**

*Advocate High Court at Mardan*

*mirshadhumraz@gmail.com*