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7	· ·	Ар	peal No.	1	271/2023		•	·, ×*
	S.No	Date of order proceedings	Order or other	proceedings	with signature o	fjudge		
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	1-	05/06/2023	The	•••	of Mr. Umar			
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The appeal of Mr. Umar Dd SST GMS Chari Shabi Khel District Lower Kohiston received today i.e. on 08.05.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- In the heading of appeal there are only three respondent but in the paragraphs of the memo of appeal the number of respondents have been shown 4 the same may be rectified.
  - 2- Annexures- A & B of the appeal are illegible which may be replaced by legible/better one.
- 3- Annexure-C of the appeal is incomplete.

No. 1382/S.T. Dt. 9 5 /2023.

STRAR

SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Mr. Noor Muhammad Khattak Adv. High Court Peshawar.

The objection 1 and 2 have been addressed, nowever the secondize objection 3 the Gocients attached costs the appeal is provided by client and he has only that and nothing else. I had still about Kosubonilled of the Semme of adjultus TO123

# BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

# SERVICE APPEAL No. 1274 / 2023

# UMAR DAD VS EDUCATION DEPTT:

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S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal with Affidavit		1-4
2.	Appointment order	А	5.
3.	Copy of BA degree	В	6
4.	Copy of the seniority list	C	7-15
5.	Copy of the service rules	D	16 -22
6.	Copy of notification dated 28/10/2014	E	23-2-
7.	Copies of the departmental appeal, judgment dated 13-02-2017 and dated 05-04-2016	F, G & H	28-4
8.	Copy of the notification dated 16-11- 2017	I	43-40
9.	Copy of the judgment of the apex court	J	45-4-
10.	Copy of the result card	К	48
11.	Copies of the departmental appeal, service appeal, impugned orders	L, M, N & O	49-5
12.	Copy of the Departmental appeal	P.	58-60
13.	Vakalatnama	•	61

# INDEX

APPELLANT

Through:

NOOR MOHAMMAD KHATTAK ADVOCATE SUPREME COURT OF PAKISTAN

# BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 271 /2023

Mr. Umar Dad, SST (General) (BPS-16), GMS Chari Shabi Khel, District Lower Kohistan.

.....APPELLANT

#### VERSUS

- 1- The Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer, District Lower Kohistan.

...... RESPONDENT

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDERS DATED 26.12.2022 AND DATED 2.2.2023 WHEREBY THE PROMTION ORDER DATED 16.11.2017 OF THE APPELLANT AS SST (G) (BPS-16) HAS BEEN WITHDRWAN AND THE APPELLANT HAS BEEN POSTED/ADJUSTED AS PSHT (BPS-15) AND AGAINST THE INACTION OF THE RESPONENTS BY NOT DECIDING THE DEPARTMENAL APPEAL OF THE APPELLANT WITHIN THE STATUTOY PERIOD OF NINETY DAYS.

#### PRAYER:

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That on acceptance of this appeal the impugned orders dated 26.12.2022 and 2.2.2023 may very kindly be set aside and the promotion order dated 16.11.2017 of the appellant as SST (G) (BPS-16) may kindly be restored with all back benefits including seniority. Any other remedy which this August Tribunal deems fit that may also be granted in favor of the appellant.

## <u>R/SHEWETH:</u> ON FACTTS:

- 4- That the respondents vide notification dated 24-07-2014 have notified the service rules/ structure whereby vide serial No. 1B (f), 20 percent quota has been allocated for the appellant cadres. Copy of the service rules are attached as annexure ......**D**.
- 5- That vide notification dated 28-10-2014 colleagues being junior to the appellant was promoted to the post of SST (General) (BPS-16) and the appellant was ignored on the basis of having third division in Bachelor of Arts. Copy of notification dated 28/10/2014 is attached as annexure ......**E**.
- 7- That in compliance of the judgment dated 13-02-2017 the appellant was promoted to the post of SST (General) (BPS-16) vide notification dated 16-11-2017 but with immediate effect and not w-e-f 28-10-2014 when his junior was promoted to the subject post. Copy of the notification dated 16-11-2017 is attached as annexure I.
- 9- That during pendency of the case before the apex court of Pakistan the appellant has improved his qualification by obtaining Master in Islamiyat in 1<sup>st</sup> division and thus the last obtained degree is not in the ambit of 3<sup>rd</sup> division. Copy of the result card is attached as annexure

....K.

10- That the appellant feeling aggrieved from notification dated 16-11-2017 whereby the appellant was promoted with immediate effect and not w-e-f 28-10-2014 when his junior

# **GROUNDS:**

- A- That the impugned orders dated 26.12.2022 and 2.2.2023 whereby the promotion order of the appellant has been withdrawn and the appellant has been posted as PSHT (BPS-15) are against law, facts, norms of natural justice and material on record hence liable to be modified/ rectified.
- B- That appellant has not been treated by the respondent department in accordance with law and rules on the subjected noted above and as such respondents violated the Article 4 and 25 of the Constitution of Islamic Republic of Pakistan.
- C- That the appellant has been discriminated by the respondents while issuing the impugned orders dated 26.12.2022 and 2.2.2023 whereby the promotion order of the appellant has been withdrawn and the appellant has been posted as PSHT (BPS-15). is violative of the principle of locus Poenitentiae.
- D- That the respondents acted in arbitrary and malafide manner while issuing impugned orders dated 26.12.2022 and 2.2.2023 whereby the promotion order of the appellant has been withdrawn and the appellant has been posted as PSHT (BPS-15).
- E- That the impugned orders dated 26.12.2022 and 2.2.2023 whereby the promotion order of the appellant has been withdrawn and the appellant has been posted as PSHT (BPS-15) is violative of the principle of locus Poenitentiae.
- F- That the impugned orders is in derogation of section-8 and section-9 of the Civil Servant Act; 1973 read with rule 7 and rule 17 of the APT rules, 1989, therefore not tenable and liable to be set aside.

- F- That the impugned orders is in derogation of section-8 and section-9 of the Civil Servant Act, 1973 read with rule 7 and rule 17 of the APT rules, 1989, therefore not tenable and liable to be set aside.
- G- That the impugned orders are also in complete derogation of Article 38(e) of the Constitution of Islamic Republic of Pakistan, 1973, therefore not tenable and liable to be modified/ rectified.
- H-That the appellant seeks permission to advance other grounds and proofs at the time of hearing.
  - It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Dated: 4.5.2023

**APPELLANT** UMAR DAD

THROUGH:

# NOOR MUHAMMAD KHATTAK **ADVOCATE SUPREME COURT**

10-

<u>ح</u> **KAMRAN KHAN** 

UMAR FAROOQ **ADVOCATES** 

# AFFIDAVIT

I, Mr. Umar Dad, SST (General) (BPS-16), GMS Chari Shabi Khel, District Lower Kohistan, do hereby solemnly affirm and declare on Oath that the contents of this Service Appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal:

DEPONENT

ANNEX 11AP THERE WATER (MALE) KONISTAN AT TATTAN. 26 \*\*\*\*\* OFFICE ORDER NO. APPOINTIENT/ADJUSTIENT. DATE. /1 The following condidates are hereby appointed egainst Vocrat ETC Post in the School noted against each in BPS 7 (Rer 553-23-202) Ra:560/- PM fixed Plus usual allowances as Charge and the damage admissible under the raled in the jut of Public Service W.E.F. the date of taking over Charge. Net 1-4-S. NO. Name/Father Name Residence (1) Ma: Umar Dad 3/0 Romelya Cand: at sps Kun Mi: Balia A. Comelya Cand: at sps Kun A. N. C. Post Remark MOTE: 1. Charge report should be submitted to this office in Duplicat
2. No CA/DA and TO is ellowed any One.
3. They required to Produce Meetth and age Certificate from Undical Superintendent: Concerned.
5. Theire Services are liable to terministion at any iffine with out inv reason being assigned arrival of training.
5. They Should not be ellowed to take over Charge if their age i destificate will be to the over Charge if their age i found their set of the start will be created and in case Certificate will be to take over the off in case of the over if their age i found to be to take over the off in case of the certificate will be to take off the off of Such Start will be to the over the off of Such the order of the over the off off the off off the off the order of the over the order will a start off the order of DISTRICT EDUCATION OFFICER (MALE) KOHISTAN AT PATTAN. Endst: NO. 1161-63 14-1 Deted Kohiston the sction to the:- "of the above is forward of for infernation and ງຸ່ /1986. nece 1:- ADEN (Academic) Local office a 2:- ADEO (Accounts) Local Office. ttext 3:- Cendidrie Concerned. 4:- Office order file.

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# Legible Copy Page-5

#### **OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHISTAN AT PATTAN**

Office Order No.178 Date 2/3/1986

### APPOINTMENT / ADJUSTMENT

The following candidates are hereby appointed against vacant PTC post in the School noted against each in BPS-7 (Rs.550-28-2020) Rs.560/- PM fixed plus usual allowances as \_\_\_\_\_\_ admissible under the ruled in the interest of public service w.e.f the date of taking over charge.

			•		
S.No. Name /father name	Residents	From	To	Remarks	
(1) MA: Umar Dad S/o	· · · · · · · · · · · · · · · · · · ·		· · · · · · · · · · · · · · · · · · ·	······································	
		•			

(2) MA: Balai

#### Note

- 1. Charge report should be submitted to this office in Duplicate
- 2. No TA/DA and TA is allowed any one.
- 3. They required health and age certificate.
- 4. They are required to produced health and age certificate from Medical Superintendent, concerned
- 5. Their service are liable to be termination at any time without any reason being assigned arrival of trainees.
- They should not be allowed to take over charge if their age is less than 18 years and above 30 years.
- Certificate of all candidates will be checked and in case any certificate found bogus, service of holder of such certificate will be terminated.
   Candidate should take over charge within ten days of \_\_\_\_\_\_Of the order.
- Candidate should take over charge within ten days of ...... Of the order otherwise appointment order will stand cancelled.

#### Sd/-

# District Education Officer (Male) Kohistan in Pattan

#### Endst. No.1461-63/A-I

# dated Kohistan the 2/3/1986

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

- 1. ADEO (Academic) Local Office.
- 2. ADEO (Accounts) Local Office
- 3. Candidates concerned.
- 4. Office Order file.

ANNEX 11 B An evin a being and in Duly All Al - I fan . 1111 - Al A- NINATION WAS I WEN AS wited in th 90- Pl-A-4692-26-3-612 1-1.1 1 there Incompation of Buch ig of which is jet Devel. SESSION /GAL ... A BUR & in the first of This is to truth? The Annual Oent IS MAN () NTAL Y. HOM UOLET IN PARTS el in ..... Hit rel. Division be ALLA (X. 64975 EL A ---- tot the

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# UNIVERSITY OF PESHAWAR (Pakistan)

Provincial Certificate Session 1991 Annual/Supply THIS IS TO CERTIFIED THAT

Mr. Mrs.	Umar Dad Khan			· · · · · ·	·		· · ·	· · ·
Son /Daughter of	Balin Khan	•		. ·			• •	
And a candidate of	Kohistan				· ·	• •		•
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Registered No. 90-P/A 46927

Result declaration date 26.03.1992

Roll No.64975

Issue dated 27.12. 92

Sd/ Deputy Controller Examination

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		SAR BALAND	FA	PTC	NIMPULHA	15	8/30/13	B KOHISTAN	12/06/198	87 14/03/19	91 GP	S CHARTO KAYAL		<u> </u>
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			BA	PTC	HAZRAT KHEZAR	15	31/08/.19	68 KOHISTA		9/44/49	91 GP	S Dugah Razixa	╺╼┼╾╼╼╼╼╼	
盟	370.0	DAH GAMMAHOM		PTC	RAJOO	15	3/6/19	67 KOHISTA			91 GF	S Janas Abad		
1	3.1515	NCOR NABI	BA		MALIK KACHOO	15	6/1/19	69 KOHISTA	9/10/19		01 14/	S SEGA JIJAL		
73	34415	ABOUL QADOOS	FA_	PTC		12	03/09/19	68 KOHISTA	11/09/19			S LUNDHAR		
	32083	SHAH JEHAN	Mid	PTC	MOH: HUSSAIN		25/12/19	68 KOHISTA	N 15/09/19		91 61	Bland Bataira		
स्ट	30200	ATTAULLAH	FA	PTC	HAZRAT AHMAD	15	231214	69 KOHISTA	N 9/15/19	87 3/14/1	91 GI	S Darad Bataira		
5	10 21 201		Isso	PTC	Khalmay	12	2013	COLUCIAL COLUCION		87 14/03/1	991 GI	PS PIRANO KILLI	Retirement	
3	3331/4	Anwarul Haq	FA	PTC	NOOR MOHAMMAD	15	15/04/1:	69 KOHISTA			991 M	IS ISARDAR BANDA		
. <u>B</u>	332544	SARFARAZ		PTC	ABDUL QADER	15	10/04/19	70 KOHISTA			991 M	S TAKHT RANULIA	┈┼───	
	332078	ABOUL BAYAN	FA		JAN MALIK	115	10/10/1	65 KOHISTA	N 17/09/11		5916	PS JANCHAL		<u></u>
R.	332069	AMAL KHAN	FA	PTC		115	01/02/1	BEB KOHISTA	N 17/09/1					
日秋	332149	QADER KHAN	FA	PTC	UMAR GUL	115	19/04/1	969 KOHIST	N 18/09/1	987 14/03/1	1921W			
atrić L		FAZAL REZWAN	BA	PTC	GUL ZARIN	_	0/46/4	970 KOHIST	N 9/19/1	988 <u>3/14/1</u>	991 G	PS MILECH ADD		
i i i	1112	UMAT RASOOL	BA	PTC	SAIDJALAL	115		955 KOHIST	N 01/10/1	987 14/03/	1991 0	PS JAG DUBAIR		
			Iss		MUTAWAKEL	12	14/04/1	300 1001001		441031	100410	PS IDANGO JUAL		
_	332092		Iss		ABDUL HAMID	112	02/03/1	966 KOHIST			19910	SPS KARIN DUBAIK		
_	332058				MIR AHMAD	112	01/01/1	970 KOHIST			1001	WS GHEEL JAG		
	332186	FAZAL IHSAN	ss			112	11/01/1	969 KOHIST	AN 01/11/		100414			
•	332087		SS		TAJ MOHAMMAD	15		966 KOHIST	AN 11/21/	1987 <u>*** 3/14/</u>	1991			
. :		MUH: MUKHTIAR	FA	PTC	KACHO	_		969 KOHIST	AN 04712/	1987 14703	1991	GPS KOKYAL	8	
			FA		HUSSAIN	- 13	_	Sas Korist		1987 14/03	1991	GPS SANAGALDUBA	Retirement	
ł	3.001		- Iss		SAID JAMAL	12	1. 01/01/	968 KOHIST			1991	M/S Danga		
	33208					16	2/16/	965 KOHIST			11991	GPS Teek Madaknes		
	33290	Abdul hallm	FA			112	2 . 1/1/	1970 KOHIST			11991		Retirement	<u> </u>
	33322	5 Furgan	SS		Naeem Salar	112		1970 KOHIST	AN 01/01		11221			
	33210		SS	C PTC	MOHAMMAD QASIM	_	0.000	1968 KOHIS	AN 19/02	/1988 14/03	1991			
	33178		Iss	C PTC	SAEEDULLAH	12	2 00/02	1968 YOHE		1405 211/		terr Dentalitie		
			- FA		ABDULLH KHAN	1	5 1/1	Tabbit mag			3/1991	GPS BANKAD	<del>_</del>	
		3 SADAR KHAN			Loughter	Th:	2 <b>1. 10</b> in	1563 1.0115	IAN 1104				•	۰.
•	33055	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1												

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	1		Accarh Quallfi	Profis			Date of	0 D	of Entry vt: Sarvid	Oate of App: Trained/Rogu PST Teachd	 	-	Кеш	31
			· .			· .	•		Data of E Govt:			• • •	U.	$\left( \overrightarrow{a} \right)$
••.	332935	Kachkool –	SSC	PTC	Dosham	12 -		KOHISTAN	4/11/1988			K.Khakaro	Retirement	( 5//
:	333748	RAFIUD DIN	SSC	PTC	MAYOUN	12		KOHISTAN	4/26/1988	3/14/1991				
÷	332111	MOHAMMAD RAWAN .	<u> </u>	da managemente de la companya de la	SHER AFZAL	12		KOHISTAN	05/05/1988			BAR KILLI RANOLIA	· · · · ·	
		GUL NAZAR			ABDUL HAKIM	12		KOHISTAN	10/03/1987	14/07/1991		PIR ABAD	·	•
		HAKEM SHAH			AFTAB MALK	12		KOHISTAN	11/1/1980	10/22/1991		Saleech	Dalizamont	
		MUH: NOOMAN	Mid:		MUH: WAZEER	12		KOHISTAN	11/10/1982	10/22/1991		Kachar	Retirement	
		MUSSA KHAN	SSC		MATIQULLAH	12.		KOHISTAN	04/03/1983	22/10/1991		MUHAJER BANDA	Retirement	• • • • •
·		Mohammad Allf Khan 🗉	SSC	PTC	Dedar Kham	12		KOHISTAN	12/26/1984	10/22/1991		Palyat	Retirement	
۰.	3321237	SAID RAHIM	BA	PTC	MOLVI JABAL QAZI	16		KOHISTAN	29/12/1984			PIRANO KILU	·	·
		BAHAR MAND	FA	PTC .	ROOVIDA	15		KOHISTAN	9/11/1985	10/22/1991			Detirement	
		GUL NAMIR			ALIAKBAR	12		KOHISTAN	12/09/1985	22/10/1991		SHAMAL BANDA	Retirement	
	332097	ALI HAIDER	SSC	PTC	BAHADER KHAN	12		KOHISTAN	23/09/1985	22/10/1991				· ·
	333485	INAMUL HAQ	SSC	PTC	MOHAMMAD QASIM	12		KOHISTAN	9/17/1986	10/22/1991		Shakhel Khour		
	333730	Ghulam Hussain	SSC	PTC	Ghulam Nabi	12		KOHISTAN	8/1/1987	10/22/1991		Dom Bela		
	3343822	MUHAMMAD ALI	FA	PTC	MUZAMMIL	16	. 4/6/1964	KOHISTAN	9/10/1987	10/22/1991		Qasem Abad		
	312040-	NAWAB ALI SHAH	FA	PTC	AMIR SAID	15	11/11/1968	KOHISTAN	01/10/1987			SHAIKHDAR	L	· , ·
	332135	PIR MOHAMMAD	SSC	PTC	KHAN SAHIB	12		KOHISTAN	31/03/1988	22/10/1991		KUZ YANJOOL		-
	331590	MOHAMMAD IDREES	SSC	PTC	GUL NAMIR	12	01/01/1967	KOHISTAN	16/08/1988	22/10/1991	_	BAR YANJOOL	· · · · · · · · · · · · · · · · · · ·	· · · .
	332642	Abdut Hat	SSC	PTC	Molvi Sekandar	12 ·	4/6/1969	KOHISTAN	7/29/1989			Pehlawan abad	<u> </u>	· ·
	337212	GHULAM RASOOL	FA	PTC	SHAHPOO	12		KOHISTAN	18/10/1989	22/10/1991			<u> </u>	
	134998	SAR TAJ	BA	PTC	BEHRAM KHAN	16	3/1/1962	KOHISTAN	3/14/1990	10/22/1991		Rahim Abad	<u>↓</u>	<b>.</b> .
	3349865	HABIBUR LLAH	FA	PTC	MIRZAKHAN	15		KOHISTAN	3/16/1990			Eshni Dugah		l ·
	3356872	SHER KHAN	FA.	PTC	ATIKHAN	15		KOHISTAN	5/5/1990		· · · · · · · · · · · · · · · · · · ·	Anwar Abad		
	332158	SHAH HUSSAIN	SSC	PTC	HAWSO	12		KOHISTAN	08/01/1991			KOT DATRA		0 NI 8
	335550	SAHIB JAN	MId:	PTC	MOORSABEET	12	1/1/1966	KOHISTAN	1/1/1985			Shatyal Vall	<u></u>	S No C
, .	331544	AKHTAR MUNIR	Mid:	PTC .		12	2/1/1966	KOHISTAN.	11/16/1985			M Shadam:K:		8
	333799	Gulam Nabi.	SSC	PTC	Mutabar	12	1/1/1967	KOHISTAN	3/1/1992			Bar Paro		5849
		KHAN BAHADER 9	BA	T.	RUHLILLAHI	16 .		KOHISTAN	01/03/1992			MORI SHALAKAI	Promoted as a SST	1. Ser 1
	332091	KHAIRUN NASS	SSC	PTC	ABDUL HALIM	12		KOHISTAN	01/03/1992	01/03/1992		BANJAR	<u> </u>	jannich.
•		Abdul Hadi	SSC	PTC	Beradar Khan	12		KOHISTAN	3/1/1992			Mutabar Abad	· · · · · · · · · · · · · · · · · · ·	1 Junio
	332321	GHULAM MOHAMMAD	SSC	PTC	MISKIN	12		KOHISTAN	01/03/1992	01/03/1992				1 19460
	333887	Jehangir	SSC	PTC	Hakeem Khan	12	6/15/1971	KOHISTAN	3/1/1992	3/1/1992			<u></u>	
	332674	Abdu Rehman 📢	MA	Т	Abdul Hamid	15		KOHISTAN	3/1/1992		_	Habib Abad	<u> </u>	10
	332664	Sher Zaman	FA	PTC	Noor Muhammad	12	4/3/1972	KOHISTAN	3/1/1992	3/1/1992	M/S	Joom Gali		
		Nawati Khan	SA -	1	Sefat	13	4/8/1972	KOHISTAN	3/1/1992			Shatyai	Promoteo as a SST	
		SULTAN KHAN	BA	PTC	HANSO	15	12/06/1973	KOHISTAN	01/03/1992	01/03/1992	GPS	KOT DATRA	<u> </u>	
	333948	Karim Dad	FA	PTC	Majwar	15	10/2/1971	KOHISTAN	3/2/1992	3/2/1992	GPS	Kundal		B. A.
• .	33(635)	AURANG ZEB	BA	T ·	MIR ALAM	15	05/01/1965	KOHISTAN	01/04/1987	02/04/1992	M/S	MANZ BAIK	Promoted as a SST	
		ALAM GIR	ssc	PTC	HAJI ZABOOR	12	02/04/1969	KOHISTAN	01/09/1987	02/04/1992	GPS	PATTAN		· ·
		ABDUL KARIM	FA	PTC	HAZRAT HUDA	15	01/01/1970	KOHISTAN	18/09/1987	02/04/1992	GPS	JAMRA OUBAIR		J . •
		WAZIR AZAM		-	PIE SHAH ZAMAN	12	10/07/1909	KOHISTAL	19/00/1817	02/01/2013	icu:	SPLANICAT -		4
÷		that it is a fair.			FIAGENIN	12	9/1/1965	KOHISTAN	5/16/1992	8/18/1992	GPS	Leko Harban		
				<u></u>	4 <u></u>		•	• • • • • • • • • • • • • • • • • • • •	~- <u>-</u>	<u> </u>				

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	_	·		·					· · ·	ō.		Date of E Govt: 9	Dato of App: Trained/Rogu PST Teache		• • •		. ( 3/ ).
	. 3	332936	Kachkool	- Iss	C PT	· · ·	Deather	_	:	·		ļ 👌 📜	0 F -	ļ.		· · · · ·	
		33748	RAFIUD DIN	100	C PT	<u>c</u>	Dosham MAYOUN		12 .	-2/10/1970	KOHISTAN	4/11/198	8 4 3/14/1991	GPS-	K.Khakaro	Retirement	$-1/\alpha$
	·3	32111	MOHAMMAD RAWAN		C PT		SHER AFZAL	_	2	1/2/1966	KOHISTAN	4/26/198	8 3/14/1991	M/S	Akhori	ivenement .	-1 51/-
	_ 3	32778	GUL NAZAR		C PT		ABDUL HAKIM		2	02/06/1970	KOHISTAN	05/05/198			BAR KILLI RANOLIA		-1 1/
	3	33542	HAKEM SHAH		C PT		AFTAB MALK		2	01/01/1962	KOHISTAN	10/03/198	7 14/07/1991	MIS	PIR ABAD	-{- <u>`-</u>	$\sim$
	3;	31541	MUH: NOOMAN		: PT		AFTAB MALK		2	6/13/1954	KOHISTAN	11/1/1980		+	Saleech	·	-
	3:	32219	MUSSA KHAN		C PT		MUH: WAZEER		2	4/4/1958	KOHISTAN	11/10/1982				Dollarmant	_l
	· 33	33755	Mohammad Alif Khan	600			MATIQULLAH		2	20/11/1958	KOHISTAN	04/03/1983	22/10/1991		MUHAJER BANDA	Retirement	<b></b>
	. 8	212	SAID RAHIM	BA	PT		Dedar Kham	<u>1:</u>	_	10/1/1961	KOHISTAN	12/26/1984			Palyat	Retirement	<b></b>
	433	343695	BAHAR MAND	FA	_		MOLVI JABAL QAZI	11	_	01/01/1966 }	OHISTAN	29/12/1984	1		PIRANO KILLI	Retirement	<u> </u>
•	. 33	2130	GULNAMIR	ISSC	PTO		ROOVIDA	1/	5	3/15/1964	OHISTAN	9/11/1985		610			
	33	2097	ALI HAIDER	_	_ 12 - 2 - 2		ALIAKBAR	12	2	26/04/1964	OHISTAN	12/09/1985	27/10/1001	MIC	SHAMAL BANDA	<u> </u>	·
	33	3485	NAMUL HAQ		PTC		BAHADER KHAN	12	2	05/04/1960	OHISTAN	23/09/1985		1002	SHAMAL BANDA	Retirement	·
	33	3730 0	Shulam Hussain	_ ssc			NOHAMMAD QASIM	12	2	3/10/1964 H	OHISTAN	9/17/1986		013	PATTAN		_ ·
	433	43824	UHAMMAD ALI	isso	_		Ghulam Nabl -	12	1	3/10/1963 K	OHISTAN	8/1/1987	10/22/1991	GPS	Shakhel Khour	· · · · · · · · · · · · · · · · · · ·	]
	20	7139	AWAB ALI SHAH	FA	PTC	_	UZAMMIL	15		4/6/1964 K	OHISTAN	9/10/1987			Dom Bela		
•	333	2115 D	IR MOHAMMAD	FA	PTC	_	MIR SAID	15		11/11/1968 K	OHISTAN	01/10/1987	10/22/1991	WS I	lasem Abad		] .
	331	1590 14	OHAMMAD IDREES	ssc			HAN SAHIB	12		03/04/1969 K	OHISTAN	31/03/1988		GPS	HAIKHDAR		
	33	264.2 4	bdul Hal	SSC	PTC		SUL NAMIR	12		01/01/1967 K	OHISTAN	16/08/1988	22/10/1991		UZ YANJOOL		1
		110012	HULAM RASOOL	SSC	_		lolvi Sekandar	12		4/6/1969 K	OHISTAN		22/10/1991		AR YANJOOL		1 •
	1		AR TAJ	FA	PTC		НАНРОО	112	+-	02/01/1970 K		7/29/1989	10/22/1991	GPS (F	ehlawan abad		1 -
•	212	00010	ARIAJ	BA	PTC	8	EHRAM KHAN	16		3/1/1962 K	OHISTAN		22/10/1991 0				1
	412	CO 7510	ABIBUR LLAH HER KHAN	FA	PTC	M	IRZAKHAN	15	+	3/10/1970 K	DUSTAN	3/14/1990	10/22/1991	AS R	lahim Abad		1
	2000	150 01		FA	PTC	A	TIKHAN	15	+	3/1/1967 K	DUISTAN	3/16/1990	10/22/1991 0	SPS E	shril Dugah		1
	125	100 51	HAH HUSSAIN	SSC	PTC		AWSO	112	+	03/04/1970 K		5/5/1990	10/22/1991	SPS A	nwar Abad		1
	. 333	550 9/	AHIB JAN	Mid;	PTC	·M	OORSABEET	12	╧	1/1/1966 K		08/01/1991	22/10/1991	IPS K	OT DATRA		
	331	544 AI	KHTAR MUNIR	Mid:	PTC	A	IMALIK	12	1.	2/1/1966 KC	NISTAN	1/1/1985	2/4/1992 G	SPS S	hatyal Vali	· · · · · · · · · · · · · · · · · · ·	SNO. 8
	635	799 GI	ulam Nabi.	SSC	PTC		ulabar .	12	╁━	1/1/1967 KC	UICTAN .	11/16/1985	2/4/1992 G	PS M	Shadam:K:		
	222	1986 KI	AN BAHADER - 9	BA	T	RI	JHIILLAHI	15	+	02/02/1970 KC	UICTAN C	3/1/1992	.3/1/1992 G	IPS B	ar Paro		i se la
	-3320	091 KI	AIRUN NASS	SSC .	PTC		BOUL HALIM	12	<u> </u>	5/12/1970 KC	HISTAN	01/03/1992	01/03/1992 G	PS M	ORI SHALAKAI	Promoted as a SST	Stand T Stand T INCONICIA Order
	3327	709 Ab	dul Hadi	SSC	PTC		radar Khan	12	┼╴	05/12/1970 KC	HISTAN	01/03/1992	01/03/1992 M	VS B	ANJAR		and a second of
	3323	321  GI	ULAM MOHAMMAD	SSC	PTC		SKIN	12	+	2/1/1971 KC		3/1/1992	<u>3/1/19</u> 92 G	PS M	utabar Abad		[]Y[[W]0] 6
	3338	387 Jel	hangir.	ssc	PTC	_	keem Khan	12	ĻŸ	2/04/1971 KC	HISTAN 0	1/03/1992	01/03/1992 G	PS K			1 mueles
	3326	7.4; Ab	du Rehman - La	MA	Ť	Ab	dul Hamid	15	┢──	6/15/1971 KO	HISTAN	3/1/1992	3/1/1992 M	/S 8:	injar		Draci
	3326	<u>1641 Sh</u>	er Zaman	FA	PTC	No	or Muhammad		<u> </u>	3/3/1972 KO	HISTAN .	3/1/1992	3/1/1992 Ģ	PS Ha	blb Abad		ioj i
	3333	98, 112	wate Kiran	BA		_	at	12		4/3/1972 KO	HISTAN	3/1/1992	3/1/1992 M	/S Jo	om Gall		
•	总规区	<u>868</u> SU	LTAN KHAN		PTC			15		4/6/1972 KO	HISTAN -	3/1/1992	-3/1/1992 GI	PS SI	atval	Promoted as a SST	
-	13339	48r Kar	rim Dad		PTC	_		15		2/05/1973 KO	HISTAN 0	1/03/1992	01/03/1992 GI	PS KC	DT DATRA		
	2315	355 AU	RANG ZEB (2-	BA	r			15.	<u> </u>	10/2/1971 KO	HISTAN	3/2/1992	3/2/1992 GI				
	33174	45 ALA	AM GIR	SSC F				15.	0	6/01/1965 KO	HISTAN 0	1/04/1987	02/04/1992 M	S M		Brometed es a DOT	R
i	58241	S AB			TC			12	02	2/04/1969 KOI	HISTAN 0	1/09/1987	02/04/1992 GI	S PA	TTAN	Promoted as a SST	· • •
	33220	02 WA	7/17 4 79 4 44		TC		BLLASS -	15	01	1/01/1970 KOI	ISTAN 1	8/09/1987	02/04/1992		MRA DUBAIR		· • .
			· · · · · · · · · · · · · · · · · · ·	330 ji				<u>1?  </u>	10	0/02/1969 100	ISTAP 1	e'ne'ieri (	0.5% . 1.56		ARUNAL	i	
-		· ·		<u>, , , , , , , , , , , , , , , , , , , </u>	10	[hA	acris 1	12		9/1/1965 KO	ISTAN I	5/16/1992	8/18/1992 GP				•
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332820 IFa	izal Haq	SSC	PTC	Roshan Khan	12	1/1/1970	KOHISTAN	3/1/1992			Kandroo	· · · · · · · · · · · · · · · · · · ·	(
	NWAR ALI 13	BA	Т	M KARIM SHAH	15	3/5/1971	KOHISTAN	7/29/1992	11/21/1992	MS	onardong	Promoted as a SST	0
333293 F/			PTC	BAHADAR KHAN	15	6/12/1971	KOHISTAN	7/29/1992	11/21/1992	GPS	Bela Jaikot		1 ·
43350177 F/			PTC	JAHANDU MALIK	15		KOHISTAN	10/11/1992	11/21/1992				4
			PTC	HUKAMDAD	15	3/2/1971	KOHISTAN	10/12/1992	11/21/1992	GPS	Jalkot Vali;		4.
333417 Gi		SSC	PTC ·	Mirza Khan	12	7/1/1964	KOHISTAN	5/15/1985	11/22/1992	GPS	Dook Bela		I
			PTC	MALOOK SHAH	12	20/04/1967	KOHISTAN	20/10/1987	~ 22/11/1992		JAMRA PATTAN		- ·
			PTC	MIRZA KHAN	12	05/01/1961	KOHISTAN	11/04/1988	22/11/1992	M/S	GUL KHAN ABAD	Retirement	4
33338537 AL		FA	PTC	Masheed	15		KOHISTAN	10/11/1989	11/22/1992		Ishaq Khel	<u> </u>	ŀ
			PTC	Alsar Khan	15	12/11/1968	KOHISTAN	10/12/1989	11/22/1992	M/S	D;Sal;Khel		4
343779 MI	and the second		РТС	ABDUL SAMAD	12	04/02/1970	KOHISTAN	12/10/1989	22/11/1992		HAJDEER-1		-
334993 JI.			PTC	BAHADAR MALIK	12	2/18/1970	KOHISTAN	12/22/1990			Tota Abad		-
			РТС.	NAWAB KHAN	12	1/1/1969	KOHISTAN	1/5/1991	11/22/1992	GPS	Danch		-
OU GIDE AS			PTC	SHAH MARDAN	12	15/01/1971	KOHISTAN	20/02/1992			TANGI SHAMAL	<u>/</u>	
		BA	Т	Muhad Nazeer	15	3/14/1973	KOHISTAN	2/26/1992	11/22/1992	M/S	Urni	Promoted as a SST	11
3327,14E AL		BA	PTC	Muhammad Khan	15	2/1/1973	KOHISTAN	3/1/1992	11/22/1992	GPS	Mohammad A	<u> </u>	-
			PTC	IBRAHEEM	12	7/1/1970	KOHISTAN	7/29/1992			Ouchar Nala	· · ·	4
		SSC	PTC	RASHAN .	12	2/2/1971	KOHISTAN	7/29/1992	11/22/1992	GPS	Karang serto		- I :
		BA	PTC	INJEEL	15	5/12/1972	KOHISTAN	7/29/1992			Umar Abad		-1`
3338901 AI		FA	PTC	THAMBOO	15	3/3/1971	KOHISTAN	8/1/1992				<u>↓</u>	-
		FA	PTC	M Ayoub	15	6/10/1973	KOHISTAN	10/6/1992			Uno Banda	·	-
63343403 B/			PTC	JUMAYAN	15	3/1/1972	KOHISTAN	10/12/1992			Purwah	<b></b>	4
7 3333945 Ya		FA	PTC	Ghulam Haldar	15	1/2/1973	KOHISTAN	12/2/1992			Gohar Khar	Promoted as a SST	$\mathbf{U}$
3333562 AL	dur Rashid 5 V	BA	τ.	Narang	15	8/24/1972	KOHISTAN	12/5/1992	the second s		M.T.Q.S S:Abad	Promoteo as a 551	-11.
332671 Sh	ner Afzal	SSC	PTC	Anwar Khan	12		KOHISTAN	12/5/1992	12/5/1992		Char Rehmatullah	·	-
333228 Av	val Khan	ssc	PTC	Bay Khan	12	4/12/1973	KOHISTAN	12/5/1992			Bar Sharial	<u> </u>	-
	ARDAR KHAN	SSC	PTC	SAID WALL	12	01/05/1970	KOHISTAN	06/12/1992			SOYA BAIR	<u></u>	-
\$315624* SH	ER DAD	FA	PTC .	KISHAWR	16_	6/1/1970	KOHISTAN	12/6/1992	12/6/1992		Gakooz		-{
ENDING DO	OST MOHAMMAD	FA	PTC	ABDUL JAMIL	15	05/07/1970	KOHISTAN	· 06/12/1992			KHAR BEACH		-
3333601 AL	dullah	FA	PTC	Shereen	15	1/6/1972	KOHISTAN	12/6/1992	12/6/1992	GPS	Aslam Abad	Promoted as a SST	47
352648 SI	ier Afzal 🕸 🗸	BA	B:Ed	JAKAN	15	04/01/1973	KOHISTAN	06/12/1992	06/12/1993	GPS	RANOLIA	Promoted as a SST	
332028 JA	N MOHAMMAD i 🖌	BA	8:Ed	MUKHTASAR	15	08/02/1973	KOHISTAN	06/12/1992	06/12/199	2 GPS	BANKAD	Promoted as a SST	-1/2
30019769 SI	IER ZADA		8:Ed	MIR WALI	15	05/03/1973	KOHISTAN	06/12/1992	06/12/199:	ZIGPS	KHANAI RANOLIA .	Promoted as a 551	-1''
532960 GL	JL KHAN	FA ·	PTC	GOSHPUR	16	10/01/1974	KOHISTAN	06/12/1992	06/12/199	ZIGPS	MALIDARA		=
35530056 A	BOULLAH	MA	рте—	MASHAKO	19-	02/02/1974	KOHISTAN	06/12/1992	2-06/12/199	ziges	DOGA MANDRAZA		-
333395 Mu	uhammad.Raj	ssc	PTC	Nadar Shah	12	9/4/1970	KOHISTAN	12/31/1992			Galdar Kunsher		-
638004 (C SE	YAB KHAN	FA :	PTC	SHER AFZAL	15	15/11/1970	KOHISTAN	01/01/1993	3 01/01/199	3 <u> M/S</u> _	WALLABAD	·	-1.
		SSC	PTC	SULTAN	12	01/03/1973	KOHISTAN	01/01/1993			DOGA RANOLIA	<u>}</u>	
-385-695% H/	MAYOUN	FA	PTC	WADANAY	15	01/02/1974	KOHISTAN	01/01/1993	3 01/01/199	3 M/S_	KHOUR		-
332375 GU	JL TAJAN	SSC	PTC	AKBAR KHAN	12	02/07/1971	KOHISTAN	02/01/199:	3 02/01/199	3 GPS	SAWARSTEEL	· <u> </u>	-
332474 GL	JL NAMIR		PTC	HẠKIM DAD	15		KOHISTAN	03/01/1993		3 GPS	KUZ KILI I RANOLIA		-!
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•		SAIFUR REHMAN	FA	PTC	MERIA	115	05/02/4074	KOHISTAN		「			·····	(int)
	1	ALAM ZEB	FA	PTC	QADAM KHAN	12	04/04/1971	KOHISTAN	05/01/1993		<u> </u>	JAREEN RANOLIA	<u>├</u>	
		NOSHAD KHAN	BA	PTC	GULSHER KHNA'	15	1/1/1960	KOHISTAN			_	Sadig Abad	{	
		M.Sarfaraz	SSC		Amir Ayaz	12		KOHISTAN		4/7/1993			·····	
		Talizar	SSC		Molvi Qalandar	12		KOHISTAN	1/18/1987			Bandl Kohfstan	· · · · · · · · · · · · · · · · · · ·	
· .	251018	MOHAMMAD GHAZAN	FA	PTC	SAMANDER	15	10/04/1965	KOHISTAN	01/11/1987	07/04/1993		SERTOO KAYAL	· · · · · · · · · · · · · · · · · · ·	-
	353320	Muhammad Haq MOHAMMAD SABIR		PTC	Abdul Wahab	12		KOHISTAN	3/13/1990			Gahkol		
	114977	SHARIF SHAH	FA	PTC	HAJI BAMAY	15	10/04/1972	KOHISTAN	23/06/1990	· · · · · · · · · · · · · · · · · · ·	_	DANO BANKAD		-
	335625			PTC	SHAH ROOM	12	10/05/1970	KOHISTAN	14/03/1990	28/04/1993	GPS	JABBA KAYAL		
	335593		SSC		MOLVIHAJATKHAN	12	1/1/1974	KOHISTAN	7/1/1997	6/16/1993	GPS	Barai		
۰.		AHMAD SHAH		PTC	MOHAMADHALEEM	12		KOHISTAN	4/15/1981	7/4/1993	M/S	Ashroti Camp		•
	3357583	MARBAB KHAN	SSC		LATIF SHAH	12		KOHISTAN	2/22/1986	7/4/1993	GPS	Theor		
	言うつき	SHERIN		B:Ed	BRAQ KHAN	15		KOHISTAN	4/1/1990	7/4/1993			Promoted as a SST	
		Hijab Khan	FA	PTC	MOH: HASHAM	16	01/01/1967		03/04/1987			KARIN MANDRAZA	Retirement	
	3353672	ABOUR RAHEEM	BA	PTC	Shah Jehan	12		KOHISTAN	10/12/1989	12/25/1993		Lari kass		i. • •
÷	3517416	GUL MOHAMMAD		PTC	FAZAL AHAMMAD	15	3/1/1972	KOHISTAN	7/29/1992	12/25/1993				•
	\$75.070	SAID MUKHTYAR	FA	PTC	SHAH ALAM RAHIMULLAH	15.	03/07/1972	KOHISTAN	18/04/1993	25/12/1993	_	DHARAN CHAWA	· ·	· · · · ·
•	3 20 1	MOHAMMAD TAYYAB				16.	16/09/1972	KOHISTAN'	18/04/1993			KURKURANOLIA	· ·	
	33747781	SAIQOOL		PTC		15	05/03/1973		1 8/04/1993			KHAIR ABAD		· .
		SARFARAZ		PTC	the second s	12 15	01/02/1974	COHISTAN	18/04/1993	25/12/1993		the second s		
	333320	Noor Muhammad			the second s	15	06/04/1970		19/04/1993			SAPROONA		
••	3月月2025年	SAID ALAM				16	1/1/19/1	COHISTAN	4/19/1993	i		Khour Mäheen		
	333230,	Amaiz Khan	_			15	15/03/1972	OHISTAN	19/04/1993			KUZ MINZARA		,
	333352	Mamtaz Khan				12		OHISTAN	4/19/1993	12/25/1993				•
•	332006	AKBAR KHAN				12	05/08/1973	OUISTAN	4/19/1993			Dat Sharakot BELA RUSTEM KHEL		• •
			FA			15	06/08/1973 K		19/04/1993	25/12/1993		KAYOUN	<u></u>	
ĺ	ALC: NO.					15	02/02/1974 K		19/04/1993	25/12/1993		SORYA SAFA ABAD	<u> </u>	
-	332162	SOHRAB KHAN	ssc			12	05/07/1974 K		19/04/1993	25/12/1993		KAYAL VILLAGE		
Ĺ	333984	Benyamin	SSC			12	10/10/1969 K		4/20/1993	12/25/1993		Badakhel	· - ·	
	332250	NEMAT KHAN	FA:	PTC		15	04/06/1970 K		20/04/1993	25/12/1993 (		TANGIR PATTAN		
_  -	332163	MASOOM KHAN	SSC	PTC		12	05/07/1970 K		20/04/1993			FAGALI KAYAL		•
-  -			SSC I	PTC	1.4.41	12	03/01/1972 K		20/04/1993			DAN CHELARI		
-			SSC		laidar Khan	12	6/15/1972 K		4/21/1993			Mughal Abad	·	· · · ·
F	333393 1		SSC-I		Sabat Mian	12-	12/12/1972 K			-12/25/1993 (	<u> </u>		<u></u>	<u></u>
ŀ			SSC (		ABOUL WADOOD	2	11/11/1971 K					SERTO KAYAL		•
+	334012		ISC F		Jujad Hussain	2	3/23/1972 K	OHISTAN	4/28/1993	12/25/1993 A		Mogri	· · · · · · · · · · · · · · · · · · ·	· · · .
┢		MOHAMMAD AMIR	SSC F	TC 1	UZAMMIL	2	12/29/1955 K		1/14/1981	5/29/1994 0	SPS	Eshni Dugah	Retirement	•
-			ISC F				01/06/1950 K		01/07/1983			ZIARAT PATTAN		·
			SC F			2	5/6/1969 K		1/17/1986			Seri Dara KSG		
_			SC P			2	4/1/,1962 K	OHISTAN	3/1/1986	6/29/1994 0			· · ·	•
<u>L_</u>		AZA REHNAM	ŝ- ļr	71. [	97.5 - 02 1002		t: /00/1 (2) (.	5: 1.		21461111	_	G G Y/25 G	······································	
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	· . !	·		· · ·		•	• •	• •		29/05/1994		YAWAI	. <u> </u>	
		· · · · · · · · · · · · · · · · · · ·					02/02/06/	KOHISTAN	12/10/1989	29/05/1994	613	AND TANDI IA		
		155	FA	PTC .		15	02/02/1404	KOULETAN	24/02/1990	29/05/1994	GPS	JAREEN RANOLIA		$\mathbf{J}$
	301661			PTC	HABIBULLAH	12	01/01/1968	KOHISTAN		6010CH096	IGPS I	SANGA KAJA ADAU	<u></u>	1
·	332652				ABDUL HALIM.	12	01/03/1972	KOHISTAN	25/02/1990		GPS	SERAI KANDAW		- I ·
•	332277	SAID AHMAD		· · · ·	ABDOLINGIN	12	01/04/1966	KOHISTAN	01/03/1990	29/00/1004	aare	MAKOI	i	- I .
	002017	SARBAZ	SSC	PTC			01/01/1967	KOHISTAN	01/03/1990	.29/05/1994	1103	ANICI RANKAD		_
	331021		SSC	PTC	SAMANDER KHAN	12	01/01/1001	KOHISTAN	01/03/1990	29/06/1994	GPS	SANGI BANKAD		1.
1	332150	AURANG ZEB		PTC	GHULAM QADER	15	01/10/19/1	KUNISTAN		5/29/1994	GPS	SANGI BANKAD		
	632893	ALI REHMAN			HAJI FAZAL REHMAN	12	6/2/197	KOHISTAN			IM/S	DHAR KANDAR		_
	·331638	HAMID UR REHMAN		PTC	CALLER KHAN	12	01/01/196	KOHISTAN	14/03/1990			SEGOGI JIJAL		
	340885	DURAJ KHAN	SSC	PTC	SAJAD KHAN	12	17/01/196	4 KOHISTAN	14/03/1990	25/05/195				
• ;	340000	LASHKAR KHAN	SSC	PTC	ABDUL HALIM	_	01511.05	BKOHISTAN	3/14/1990	5/29/199	GPS		· ·	_
•	332938		BA	PTC C	QEHQAN KHAN	15	23138	A KOULET AN		29/05/199	4 M/S	KHEL		
	¥3333874	ABDUL KAREEM	FA	PTC	MIR KAAF	12	02/02/195	SKOHISTAN		E 100/199	4 GPS	Jabba		7
	13325825	MOHAMMAD YOUNAS			Muhammad	15	2/1/196	8 KOHISTAN		E120/109	al GP3	Kuz Seri Kola	_ <u></u>	
	\$537929	Gul Faraz	FA	PTC		12	1/4/197	OKOHISTAN	3/15/198	*	1000	Rechow Petow		
	340852	Earo7	SSC	PTC	Jaffer Khan	15	3/2/197	KOHISTAN	1 3/15/199			Kasa Bala		
	340032	Walayat Khan	BA	PTC	ALAMGEER	_	215/107	OKOHISTA	V 3/16/199	0 6/29/195	4 6 95	Rass Coll		
	1332 tabi	Walayat Hann	SSC	PTC .	MIR DAD	12	315/101	KOHISTA	15/03/199	0 29/05/199	4 GPS	SANAGAI DUBAIR		<u>.                                    </u>
•	335311	ABDUR REHMAN	FA	PTC	SAID HUSSAIN	15	19/05/19/	UNCHISTAL		0 29/05/199	4 M/S	JEE PATTAN		-7
	6332018	AMINUL HAQ			SAJED	12	03/04/19	1 KOHISTA	the second se	a	AMIS	iBar Dat		<b>-</b> 1 ·
	331657	GUL SHAHZADA	SSC	_		112	9/20/19	1 KOHISTA			4 GPS	GAYA DUBAIR	1	<del>,   ,</del>
	353311	Amaiz Khan	SSC		Jamroz	12	05/11/19	2 KOHISTA	N 15/03/199			Bakhi NO 2	Promoted as a SS	<u></u>
	224 862	AKHTAR MUNIR	ISSC	PTC :	SAYED	115		71 KOHISTA	N 3/16/19		94 01	S Ajal Gat	l	<u> </u>
	231302	AYOUB JAN 24 V	BA	:Ed	JMAL KHAN	_		68 KOHISTA	N 3/21/19	90, 5/29/19	94 GP	S Mar Gat		
	100000	CAPOUR HAMAN	FA	PTC	SAIFUL MALOOK	12	0/0/10	69 KOHISTA	N 3/21/19	90 5/29/19	94 GP	S Dadboon		
	333800	ABDUL HANAN	FA	PTC	HAJIMECHO	15		SS KOLISTA		60 6/29/19	94 GP	S Kndroot		
	7335760	GUL ZADA	_	_	MUHAMMAD KHETAB	12	3/1/19	70 KOHISTA		60 5/20/10	94 GP	S Faiz Abad	Promoted as a SS	ST
	335746		ISSC		MUHAMMADTAHAIR	16	2/18/19	72 KOHISTA			94 GP	S Jehangir Abab	Promoted as a	
	¥335667	ROHUL AMIN	BA	PTC		1	1/1/19	70 KOHISTA	N 3/29/19			S SEROTI		
-	12333306	Muh: Zaher shah	' BA	B:Ed/C	TAmir Hamza	12	01/01/19	68 KOHISTA	N   18/04/19		00400		· · · · · · · · · · · · · · · · · · ·	<u></u> {· · ·
	.331713		Iss	C PTC	ABDUL HALIM		01/04/1	TI KOHIST	AN   18/04/15	90 29/05/1	994 IW			
•			Iss		KHAZAN	1		69 KOHIST	AN 19/04/19	90 29/05/1	<u>994]M</u>	S SHARZADA ABI		
	332354	MOH: BARRASH	ss		MIRZA KHAN	1	2 . 02/02/1	SOS KOTIOT		990 29/05/1	994 GI	S DATRA		
	331556	SHAHZADA			GUL REHMAN	- <b> 1</b>	2 05/05/1	970 KOHIST		200 200051	994 G	PS [PATTAN		1
	331618	MOHAMMAD SHOAIB			MOLVI JAMAL	-11	5 01/06/1	970 KOHIST			994 G	PS iBar Kakaro		
	6349830	GUL KHAN	FA			-11	5 3/1/1	972 KOHIST	AN 5/6/1		004	IS DHAR JAYA KHEL		
•	201218	Gul Faraz	BA		Miskeen		2 03/04/1	971 KOHIST	AN 09/05/1	880 Saloa	334 10	PS Harbankot		
			, 199	C PTC	QALANDER		·	970 KOHIST	AN 5/10/1	990 5/29/	1994 G			
	33262	FAZAL WADDE	SS		AZZAT KHAN	_	2 8/10/1	STUKOLIST	AN 5/30/1	990 5/29/	1994 G	PS Jamra AA		
	33555	3 YOUSUF JAN	FA		SAID FAQEER	1	5 .3/10/1	964 KOHIST			1994 0	13 Sharakot.		
	+33630	6 INAYATUR REHMAN			Nadar Shah		2/3/	372 HOI 1131			1994 0	PS SERI JIJAL	╶╾╋╧╾┯╼╼┯	
	-35366	4 Muhanmed Yousef	-96		ABDUR RAZZAQ		2 30/12/	1969 KOHIST			1994	os Shamal Gull 1		
	34093		SS	C PTC		_	12 4/4/	1965 KOHIST	FAN 6/23/		13341		ĒL ]	
	34084		S	SC PTC	Abdul Hakim	_		1969 KOHIS	TAN 23/06/	1990 29/05	1994 (			
	34084	SHAH JEHAN	B	A PTC	BADSHAH	_		1969 KOHIS	TAN 6/30/	1990 5/29	1994	W/S Nuch dano		]
		DA SHAR JERAN		SC PTC	Issam Khan			1999 NONIG		1990 5/29	1994	GPS Bar Masham	Retirement	
	33314		_				15 10/1/	1972 KOHIS			/1994	M/S KHEI		
	33322	Gul Mohammad	<u> </u>				12 05/07	1959 KOHIS		a construction of the second	 'i ≂⊃i			
	33173	MOHAMMAD GIR	S	SC PTC		1	1 3.1	48 <u>1 1</u>	. Fair Stand	<u></u>				
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		'Shehzada		PTC	Abdel Jalit	12.	5/10/1970	KOHISTAN	-3/14/1990	6/25/1995	GPS	Below		1/1/2
<i></i>	- 333547		SSC		M Sagheer	12		KOHISTAN	5/14/1992			Musika Kot	<u></u>	
	333776		SSC		PER SAEED	12	8/20/1970	KOHISTAN	5/22/1992	6/25/1995		Kuz Tayal		
•	2334931	MUMTAZ KHAN	FA	РТС	KISHWARMIN	15	11/20/1970	KOHISTAN	3/15/1990			Doga Razeka		1
	20.00/31	IBRAHIM KHAN	BA:	PTC	AZMAT KHAN	15	12/10/1970	KOHISTAN	6/16/1992			Kuz Serl Jalkot	· · ·	]
	1222013 12251 EX	FAZAL QADEEM	BA		AHAMADALI	15		KOHISTAN	5/16/1992	5/25/1995	GPS	Barl Yar		27
		Mohammad Duraj	BA.	B:Ed		15	15/01/1971	KOHISTAN	16/05/1992	25/05/1995	M/S	KUKER KHEL		28 Fazal
·	101205,0	TAJ MUHAMMAD	FA	PTC		16		KOHISTAN	5/16/1992			Naseer Abad		
	333896	ALI HAIDAR	FA	PTC		15		KOHISTAN	5/16/1992	5/25/1995				· · · · · · · · · · · · · · · · · · ·
	335620	JAN MUHAMMAD	FA	PTC PTC		15	2/1/1971	KOHISTAN	5/15/1992	5/25/1995	GPS	Kuz Gaheen-1		
	331543	MUHAMMAD ALI	SSC	PTC		12		KOHISTAN	5/16/1992	5/25/1995				·
	3356798	BAKHAT SHERWAN	BA			12		KOHISTAN	5/22/1992			Kuz Gabral	<u> </u>	
-	333554	Nawab Khan	SSC.			15		KOHISTAN	5/23/1992	5/25/1995		Taj Abad	<u> </u>	· · ·
	3357578	SHER GHAZI	BA ·	+		12 15	2/12/1971	KOHISTAN	5/16/1992	5/25/1995		Banaker barl		4.
	8333751	Adam Khan		PTC		16		KOHISTAN	5/16/1992	5/25/1995		Kndroot	Died	4
•	3329075	Munir Khan	BA			15 15	3/10/1971	KOHISTAN	7/30/1992	5/25/1995		Sammar Gall		{ ''
	333407	Furgan shah		_		12		KOHISTAN	5/16/1992			Kot madakhel		· .
	333918	Abdul Wadood				12		KOHISTAN	4/21/1993 9/1/1992	5/25/1995		Ball Bakroo Asool Thoti	<u> </u>	· · ·
	331559	FARHAD ALI	<u> </u>			12		KOHISTAN	2/13/1993			Bagh Seerl	· · · · · · · · · · · · · · · · · · ·	<b>{•</b>
	335718	Hazrat Khan				12		KOHISTAN	5/15/1992	5/25/1995		Khoshi		l. • • .
•	331535	KESHWAR KHAN	SSC			12		KOHISTAN	5/24/1992			Kar Bagroo	<b> </b>	
			SSC			12	5/10/1971	KOHISTAN	4/22/1993	5/25/1995			······································	· ·
	331524	SADBAR KHAN	SSC	PTC		12	5/12/1971		3/9/1993			Bar Gabral	· · · · · ·	.s.NO
·	331529	RAHMAT DIN SHAH	SSC	PTC		12		KOHISTAN	5/23/1992	5/25/1995	_	the second se		
•	333962.			M:Ed/B:	Nosher	15	6/20/1971		4/24/1993			Najam Kot	Promoted as a SST	the states
		Kareemdad				16	8/12/1971	KOHISTAN	5/21/1992	5/25/1995				
·	346989;	Aourang Zalb	BA	<del>U.C</del>		15	11/20/1971		5/17/1992	5/25/1995		Kandar		promo
	1345/285		_			5	11/20/1971		4/20/1993	5/25/1995	GPS	Karoo Seer		
	3332602	Abdul Hamid				5	12/3/1971	KOHISTAN	5/16/1992	5/25/1995		Bar Banda		~ Y
	53331239 53331239		_			5	12/20/1971		5/14/1992	5/25/1995	M/S	Bader Jamil A'	•	- Contraction
· ·.	12327205					5	1/1/1972	KOHISTAN	6/16/1992	5/25/1995	M/S	Mallar G;Abad	· · · · · · · · · · · · · · · · · · ·	] · .
	2345455		_			5		OHISTAN	6/16/1992	5/25/1995	GPS	Madakhel 2		· .
	225797			PTC [		2	1/1/1972 1	OHISTAN	5/16/1992	5/25/1,995	GPS	Jamra Kandia		]
	333377		_			2		OHISTAN	4/24/1933	_0/23/1999		KUZ BAK		· · · · ·
	3335377					2		OHISTAN	5/16/1992	5/25/1995		Muslim Kot		<u> </u>
	3356428					6	2/1/1972	OHISTAN	5/16/1992	5/25/1995		Shakhel Khour		1 ··
	335671					5	2/1/1972 H		5/17/1992	5/25/1995		Kass Bala		ļ, ·
	335763		SSC I			2	2/2/1972		5/16/1992			Bairlo Sher.A	<u> </u>	l <sup>*</sup> · .
•	333682					5	2/2/1972 1		5/2,3/1992	5/25/1995		the second s	·	1
· · ·	33495- 1	SUAMERIC PARAA	550 1	- 10. M		2	2/5/1972		5/22/1992	5/25/1995		Jeloo		
•	- · · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·		· · · ·			2 74 1.5 j.	Strikery	4.11.	<u>tizonisecji</u>	<u>h </u>	Khanki	<u> </u>	] .
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	<u>337)</u> G	Shamsur Rehman	FA	PTC	Farid		+	<u> </u>				· ·	<u> </u>	1. Cole
	13595 <sub>7-12</sub>	AHSAN SHAH	FA		AHMED SHAH			KOHISTAN					·	コリング
•	· 18761024	GUL HASSAN	BA		MOH: YAQOOB	14		KOHISTAN				Gaider No 1	1 A	
	352655	Abdul Salam	MA		Saifur Rehman	14		KOHISTAN		02/12/2006	GPS	PATTAN	· · ·	1
	P359970	AZAL RABI	FA		ALAMGIR	14		KOHISTAN						1
`	4362612F	SHER BAZ	FA		SAJJAD	14		KOHISTAN		12/2/2006	SPS	Ishedar No 2		
	385132 5	Sanwar Khan		C PTC	Zardad	• 12	-04/04/1978	KOHISTAN	02/12/2006			DHAR KANDAR		
	362630 F	AZAL REHMAN	ISS		MIR ALAM	12		KOHISTAN	12/2/2006	12/2/2006 0	3PS	Koolla		1
	. 862656 F	AZAL REHMAN	BA		GUL KHAN	12		KOHISTAN	02/12/2006	02/12/2008 0	SPS	KAYOUN		<b>1</b> · · :
	3599595H	likmet Shah	FA	PTC		14	05/10/1978	KOHISTAN	02/12/2006	02/12/2006	GPS	DARKILLI		1
	1359944X S	aedur Rehman	BA	PTC	RAHIM SHAH	14		KOHISTAN	· 12/2/2006	12/2/2006	SPS .	Baja Vali		1 .
	\$359961EM	UHAMMAD NABI	FA	PTC	HAJI DERJEHAN	14		KOHISTAN	12/2/2006	12/2/2006 0	<b>PS</b>	Segakot		
	BLE E E E	IA UL HAQ	_	PTC	DARWAISH	. 14		KOHISTAN	12/2/2006					1
	976 (1998 S.	ARBELAND	BA	PTC	NOOR NABI	14	02/02/1979	KOHISTAN	02/12/2006					<b>1</b> . · .
•	8626512 M	OHAMMAD YOUSAE	FA	PTC	FAZAL HAQ	14	01/04/1979	KOHISTAN	02/12/2006	02/12/2006				1.
	152657 M	UHAMAMD AFZAL	FA	PTC	MUHAMMAD ISMAEL	14	06/04/1979	KOHISTAN	02/12/2006	02/12/2006 G	iPS i	KAYAL VILLAGE		4.
•	498959 <u>6</u> SA	AIFUR REHMAN	FA		JUMAZARIN	14	01/05/1979	KOHISTAN	02/12/2006				· · · ·	
	-3599382 MI	UH: BASHEER	FA	PTC PTC	MOHAMMAD TAJ	14	01/06/1979	KOHISTAN	02/12/2006			CHAROONA BANKAD		4
	8626345 M	OHAMMAD IRFAN	BA .	_	AMDAL SHAH	14		KOHISTAN	. 12/2/2006	12/2/2006 G			·	
	3599751 NC	OOR QABOOL	_	PTC	MASOOM KHAN	: 14	20/01/1980	KOHISTAN	02/12/2006			CHAROONA BANKAD		4
• •	370613 Mu	hammad Baddar	FA	PTC	KHAN POOR	14	3/10/1980	KOHISTAN	12/2/2006	12/2/2006 G				-
	370674 ML	JHAMMAD AZEEM	FA	PTC	Alef khan	14	· 8/14/1980 H	KOHISTAN	12/2/2006			Zareen Abad		
	3599653GU	IL SHAHZADA	BA	PTC	SHER ZADA	12	01/01/1981	OHISTAN	02/12/2005			SUDOOR ABAD		
	376105 JA	HANZAIB KHAN	_	PTC	RAJ	14	1/5/1981	OHISTAN	12/2/2006			Sekander Dader		
•	359936 SH	AMS -UD- DIN	FA BA	PTC	ABDAR	14	2/1/1981	COHISTAN	12/2/2006	12/2/2006 G				,
	359900 <sup>1</sup> SH	AKEEL KHAN	FA	PTC .	BAHADAR KHAN	14	1/1/1982 H	OHISTAN	12/2/2006			Dugah Razika		1 ••
۰ ·	3405012 MU	HAMMAD ALI	BA	PTC	BERAÓAR	14	1/1/1982 H	OHISTAN	12/2/2006			Mamoki Seer		· ·
	359940- ABI	DUL QAYUM		PTC.	NAQAL SHAH	14	3/9/1983 X		12/2/2006			DASSU Village		1 🔨 🖓
•	3599411 ABI		<u> </u>	PTC	MUHAMMAD GHULAM	14	4/10/1984 K	OHISTAN	12/2/2006	12/2/2006 M		Gulkoor		- · ·
	3599295 MU	H- 748008		PTC	ABDUL SHAKOOR	14	12/4/1984 K		12/2/2006	12/2/2006 G		Harban Kot	· · · ·	<b>}</b> ∙`
•	1545202 WA			PTC	ABOUL MALIK	14	1/1/1985 K		12/2/2006	12/2/2006 M	_	Dahar		
	359973- AUF				ABDUL QADER	14	01/07/1978 K	OHISTAN	03/12/2006	03/12/2006 G		KHOUR JIJAL		<b>∙</b> •
	362653 NOC				RAHIM DIN	14	2/1/1984 K	OHISTAN	12/3/2006	12/3/2006 G	_	Thooti		ł. , ,
	1626165 FAZ				SAEED	12	25/04/1976 K	OHISTAN	04/12/2006	04/12/2006 G				
•	1626182 NOC			PTC	SHER KHAN	14	15/03/1978 K		04/12/2006	04/12/2006 G				
	370655 NEN				ABDUL HAQ	14-	-01/12/1979 K		04/12/2006	04/12/2006 GI				
-	04593 AMI				NAWAB	14	9/18/1977 K		12/5/2006	12/5/2006 GI				
1	G2G10 HUS	B 444		TC	CADI Alco	14	08/05/1972 K		08/12/2006	08/12/2006 GI				4 ··
i	599643 NOO	The second second			GULISTAN	14	02/02/1979 K		08/12/2006			JSOOL DUBAIR		4
- 1	70647		_		MULTAN	14	2/10/1981 K	OHISTAN	12/8/2006					ι.
i	70647 ABD	ULLAH FAROOQI	A F	тс	MUHAMMAD FARIQ	14	1/6/1982 K	HISTAN		12/8/2006 GI			<u> </u>	1
	7062004000			<u>10 319</u>	14 (11)	14	2/4/1982 KG		12/8/2006	12/8/2006 GI				]
1	70639 NOO	K NABI	AP	יד.כ  ו	It is a second se	17	115/15		12/8/2006	12/8/2006 (01				1
	· · ·				and a second second	<u></u>		· · · · · · · · · · · · · · · · · · ·	1-2-2.0.	(Lewister) and a specification	<u>م به</u>	a Suzdata K		J
		•					•	-				,		

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كاللفاصيد الساليان

Certified that all the PSTs working in District Kohlstan on (Male) PST posts as Regular/Trained Teachers are included in table S/List. Certified that this S/List is final/un-disputed and not sujected in any court at any stage.

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# (17) B.C.

GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT – Peshawar, dated 24<sup>th</sup> July, 2014

#### NOTIFICATION:

No. SO (PE) 4-5/SSRC/Meeting/2013/Teaching Cadre:-In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notification No. SO (G) S&LD/1-28/2003/Vol-II dated, 09-04-2004, Notification No. SO (G) S&L/1-69/06/Vol-1/DPE/LIB dated 13-11-2007, and Notification No. SO (PE) 4-5/SSRC/Meeting/2012 Teaching Cadre, dated 13.11.2012, the following further amendments shall be made, namely:

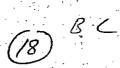
#### **AMENDMENTS**

#### in the Appendix;-

ANNEX

(i) Serial No. 1 shall be renumbered as 1B and before Serial No. 1B, as so renumbered, the following new entries shall be inserted in respective columns, namely:

	1	2	3	4	5
	"1	Subject Specialist	i. At least second class Master's Degree or	23 to 35	(a) Fifty percent by promotion, on the basis of seniority-
		(BPS-17)	four years BS Degree in the relevant	years	cum-fitness, for the relevant subject from amongst the
	-		subject; and	Ĩ	Secondary School Teachers (BPS-16), with at least five
			ii. Bachelor of Education or Master of	. <del>.</del>	years service as such and having qualification
			Education or M.A Education or equivalent qualification from a recognized		mentioned in column No.3
	ľ				Note: If no suitable candidates is available in the relevant
ļ	1		University	• • •	subject the post falling in their promotion quoto shall be
					filled by initial recruitment; and
1	1				



				(b) fifty percent by initial recruitment.
A D	irector Physical	At least second class Master's Degree in 22	-35	(a) Fifty percent by promotion, on the basis of senio
E	ducation (BPS-17)	Physical Education from a recognized ye	ars	cum-fitness, for the relevant subject from amo
		University		Senior Physical Education Teachers (BPS-16), with
			:	least five years service as Senior Physical Educa
				Teacher and Physical Education Teacher and ha
• • • •				qualification mentioned in column No.3
				Provided that if no suitable person is avail
				form amongst Senior Physical Education Teachers
			• •	promotion then the post shall be filled by promotion
ŀ			`	the basis of seniority-cum-fitness, from amongst
			•	Physical Education Teachers, with at least five y
				service as such and having qualification mentioned
1			2.	column No.3;
			а <sup>на</sup> . А	(b) fifty percent by initial recruitment; and

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)	7	3	4	ving shall be substituted in respective columns, namely: 5
B	Secondary School / Teacher (BPS-16	1. At least second class Bachelor Degree's fro a recognized university on need basis form	21 to 35 years	1. Seventy Five per cent by promotion, on the basis of seniority cum-fitness, from the district concerned in the
		the following groups with tow subject (a) (Chemistry, Botany or Zoology)		following manner (a) forty per cent form amongst the Certified
,		(b) (Physics, Maths "A" or "B" or Statistics)		Teachers (BPS-16) with at least five years service as Senior Certified Teacher and Certified Teacher Inwing qualification mentioned in column No. 3,
		or (c) (Humanities and other equivalent groups at degree level with English as compulsory		
		subject'		Provided that if no suitable candidate is available form amongst Senior Certified Teachers for promotion then the post shall be filled by
,		and 11. Bachelor of Education or Master of Education (Industrial Art or Business		promotion, on the basis of seniority-cum-fitness, from amongst the Certified Teachers, with at least five years service as such and having qualification
••		Education) or M.A Education or equivalent qualification from a recognized University		mentioned in column No.3;
				<ul> <li>(b) Four per cent from amongst the Senior Drawing Masters(BPS-16) with at least five years service as</li> <li>Senior Drawing Masters and Drawing Masters</li> </ul>
· .				and having qualification mentioned in column No.3,

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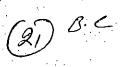
20)

Provided that if no suitable candidate is available form amongst Senior Drawing Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Drawing Master, with at least five years service as such and having qualification mentioned in column No.3;

(c) Four per cent form amongst the Senor Arabic Teachers (BPS-16) with at least five years service as Senior Arabic Teachers and having qualification mentioned in column No. 3,

Provided that if no suitable candidate is available form amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers, with at least five years service as such and having qualification mentioned in column No.3;

Four per cent form amongst the Senior Theology Teachers (BPS-16) with at least five years service as Senior Theology Teacher and having qualification mentioned in column No. 3,



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Provided that if no suitable candidate is available form amongst Senior Theology Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers, with at least five years service as such and having qualification mentioned in column

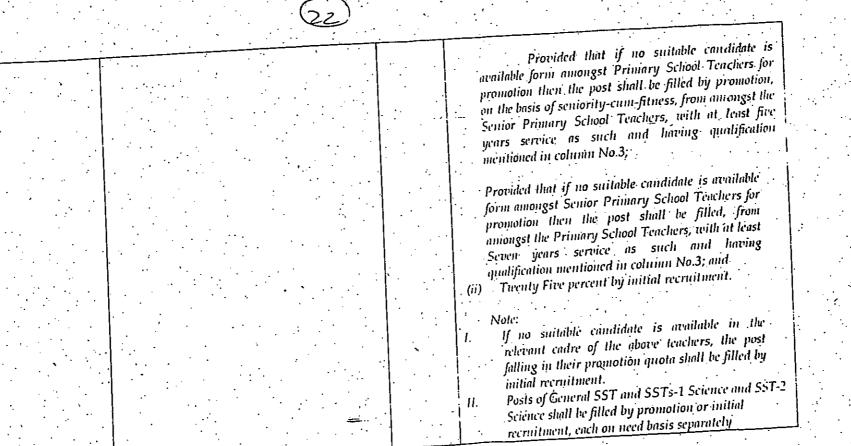
No.3;

(c) Three per cent form amongst the Senior Qari (BPS-16) with at least five years service as Senior Qari and Qari having qualification mentioned in column No. 3,

Provided that if no suitable candidate is available form amongst Senior Qaris then the post shall be filled by promotion, on the basis of senioritycum-fitness, from Qari with at least five years service as such and having qualification mentioned in column. No.3;

(1) Twenty per cent form amongst the Primary School Head Teachers (BPS-16) with at least five years service as Primary School Teachers and Primary School Teachers having qualification mentioned in column No. 3,

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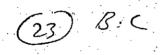
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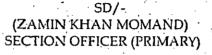
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#### SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY ÉDUCATION DEPARTMENT

#### Endst: of even No & date:

- 1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
- 2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
- The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar.
- 4. The Secretary Khyber Pakhtunkhwa, Public Service Commission, Peshawar.
- 5. The Accountant General Khyber Pakhtunkhwa, Peshawar.
- 6. The Director, Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar.
- 7. The Director of Education (FATA) Peshawar.
- 8. The Director Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
- 9. The Director (PITE) Khyber Pakhtunkhwa Peshawar.
- 10. The Director ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
- 11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
- 12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
- 13: All District Education Officer (M&F) in Khyber Pakhtunkhwa.
- 14. All District Accounts Officer in Khyber Pakhtunkhwa.
- 15. All Agency Education Officer in FATA
- 16. All Agency Account Officer in FATA
- 17. PS to Governor Khyber Pakhtunkhwa Peshawar.
- 18. PS to Chief Minister Khyber Pakhtunkhwa, Peshawar,
- 19. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
- 20. PS to Minister E&SE Khyber Pakhtunkhwa, Peshawar
- 21. PS to Secretary E&SE Khyber Pakhtunkhwa, Peshawar.
- 22. Master file



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Direction to of Elementary and Secondary Education. Kripber Paksternkhuva Peshawar 27 - 1 - 100 - 121

# <u>Notification</u>

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**IVOLUMENTED** Consequent upon the recommandations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhum Elemi. any and Secondary Education Notification NoSO(PE)/4-5/SCRC/Meeting/2013/Teaching Cadre dated 24<sup>th</sup> July.2014, the following SCTS/CTS, SDMs/DMs, SATS/ATs, STTs/TTS, Senior Qaris/Qaris, Splits/SPSTs/PSTs are hereby promoted to the post of SST (Bio-Chem),SST (Phy-Maths), SST (General) noted against each BPS-16 (Rs.1000C-S00-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted by the District Education Officer concerned on "School based". A. SST (Bio-Chemn)

<u>SST (Bio-Chem)</u> , A.

1. PROMOTION OF SCIVCT TO THE POST OF SST (BIG-Chem) BPS-16

XIII IOMI / STATE	1 <u>24</u> 1
(Total No. of SST Bio-Chem (M) Posts vacant Posts	06
25% chare initial recruitment	18
AV -b was for Promoboli.	10
1 to % Show of promotion of SCI/GI	10
Paste avgilable for promonon	05
Promoted through this order	

				ومستنب مستحد ويتصربون		4
.S.N.	S.L.No	Name of Official	Present Plane of Posting	Date of Birth	Benucks	
	32	Mohammad Nawaz	GHS Jabba Madakhel	25/3/1967	DEO (kJ) Kohistan for further posting against SSI (Bio-Chem) post on school based.	-1
2	. 34	Akhtar Parvaiz	GHSS Battaira.	3/1/1974	do	÷
3		Mohammad	ĠHSS Battaira.	21/11/1975		4
	37	Zainul Abdeen	Zainul GHSS		do	
_ <u>  _</u>		Shah Wali Ullah	CHS Ranolia	1/1/1977		

#### COTT (Carranal)

B, SST (General) BPS	5-16
B, <u>SST (General)</u> <u>B</u> , <u>PROMOTION OF SCT/CT TO THE POST OF SST (General) BFS</u> <u>B</u> , <u>PROMOTION OF SCT/CT TO THE POST OF SUBCONT</u>	121
Taked No. of SST General (M) Toats outside a second s	
acge share initial recruitment	
- all a large for Propole and the second sec	.48
to % Share of promotion of SCI/C1	48
Dente available for promocon	48
Promoted through this order	

 <u>s.</u> N {	SL No	Nume of Official	Present Place of Posting	Licco of Remarks Righth Services placed of the dispesal	1
	4	Noor Muhammad	GHS Patton	Savutas placet of DEO (M) Kohistan for further posting against SST (Gunurol) post on school baseti.	1
2	9.	Muhammad Akren. Foral Subhun	CHS Kaarso Gadom GHS fetton	2/7/1366	-

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Directorale order Dalect: 28-10-2014 see Duto"End copygilso;

	5	13	Saifur Rohmon	CHO C.	1/2/1971	dQ	
•	6	<u> </u>	· ·	GHS Seo	10/12/1964		
	ļ°	14	Muhammad Miskin Khan	GHSS Chakai		do	
	7.	15	Fazalur		8/3/1966	do	
· .	8	16	Rahman	GHS Kuz Parp	5/5/1971		
•. •	9	18.	Mohd Saghir	GHS Banil Jog	4/2/1972		20-
	7 10		Abdul Saboor	GHS Chuchang.			
• •	<u> </u>	19	Fozal Raouf	GHSS Bankhad	2/2/1971	do	
	11	20	Muhammad Yousaf	GHS Dassu	1/10/1972	do	
• • •	12	22	Fateh		1/10/1969	do	
•			Mohammod	GHS Banil Jag	6/1/1970		·
۰.	13	23	Muhammad Nawab	GHS Paro	-1-129/0	dq	
	4	28	Fazal Hag		01.04.1970	do	
·	15	-30	Asar Jan	GHS Jalkoat	4/5/1973	do	
· 1	16	31	Shir Afzal	GHS Maidan Kolai	2/1/1975	do	
	17	35	Murad Ali	GHS Shetial	4/8/1975		
	18	37	Zainul Abdeen	GHSS Battaira,	2/1/1975	C(0	
• •	<u> </u>	<u>├──</u> ─	Muhammad	GHSS Badakoar	1/1/1961		1
	19	39	Nacem	GHS Kuz Sharyal	1/12/1968	do	-
:	20	40	Hidayatullah	GHS Harban Koat.	· · · ·	do	
	-21	41 '	Muhammad Jankhan	GHS KK Ranolia	8/12/1969	do	1.
. [	22	43	Noorul Bari		6/7/1970	do	
·	23	44	Sher Zada	GHS Banil Jag	15/2/1972	do	
	24	47		GHS Harban Koat.	3/1/1972	dodo	
•	_		Abdul Majeed	GHS Lohi	z/6/1975	do	
	25	49	Amin Khan	GHS Kharoo Gaddar	18/5/1975		
· .	26	50	Fais Ahmad	GHS Bar Bela			
	27	51	Kurshid Khan	GHS Bar Bela	3/1/1962	do	•
	28	52	Firdos Khan	GHS Sharakoat	<i>¤/5/1968</i>	do	1
•	29	53	Habibur		3/10/1968	do	1
	30	54	<u>, Rahman</u> Raji Rahmat	GHS KK Ranolia	4/1/1969	do	<b>[</b> `. ↓ , `
	3:	56	Fakhrud Din	GHS Shetial	10/10/1969		
•			Mohammad	GHS Sharakoat	1/1/1976		
Ć	32	57	Nazeer	GHS Kuz Sharyal	4/4/1966		· · · ·
<u>_</u> -	33	58	Gul Nameer	GHS Seo			• • • • • •
	34	59	Kai'im Dad	GHS Karobair	3/10/1967	do	
	35	60	Yahya Khan	GHS Sherakot	3/3/1970	do	
	36	61	Muhammad		6/5/1976	do	1
	37	62	Nawab	GHS9 Banlhad	6/1/1979	do	
	38	02	Ghulam Nabi	GHS Mazoo !	6/1/1968	do	
. 1	39	67	Bawar Khan	GHS Dassu	9/2/1971		
·			Muhib Gul	GHS Pattan	21/1/1973	do	
· .	40	68	Rahim Khan	GHS Ranolia	2C/10/197		1 · · ·
· .	41	72	Abdullah	GMS Ishpidar	4		
-	42	73	Abdullah	GMS Ishpidar GMS Singa Roja	30/6/1960	do	1
• • •		<u> </u>		Abod	8/1/1970		1,
·. ',	43	76	Irshad IChan	GMS Sazeer.	9/12/1972	do	4
•		·.				ao	j s ser

44	70	Shan Alam	GMS Sazeen	3/10/1973	do
45	79	Liaqat Ayub	GHS Peroo Bela	9/1/1973	do
46	8'1	Munitaz Khon	GMS Gazai Abad	2/5/1974	
47	83	Abdullah Khan	GHS Lohi	5/9/1974	dc
48	84	Nawaz Khan	GMS Dag Pattan	6/7/1974	

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 PROMOTION OF PSHT/SPST/PST TO THE POST OF SST (General) BPS-16.

 Total No. of SST General (M) Posts vacant Posts
 121

 25% share initial recruitment
 30

 75% share for Promotion,
 91

 20 % Share of promotion of PSHT/SPST/PST
 24

 Posts available for promotion
 24

 Promoted through this order
 24

N	SL	1	la pr	io of Official	Present Place	Dal	inf T	· · · · · · · · · · · · · · · · · · ·
{	Nn	-+-		o of official	of Posting	firifi		Remarks
	5	1		cht Jehan	GPS Segoi Bair	io/	02/1964	Services placed at the disposal of DEO (M) Kohistan for further posting against SST (General) post on school based.
2	17		Mu No	hammad bi	GPS Qilla Madakhel	2/1	1/1964	
3	21		An	nir Badshah	GPS D Village	06	/07/1956	do
4	32	+		ajuddin	GPS Mano Patti	02	/09/1960	do
5	5	2	Sh	er Afzal	GPS Bar Dublar	01	/01/1966	do
6	B	3		ifullah -	GPS Shélkhan Abad	1/	13/1968	do
7	4,	15	M Es	ohammad	GPS Bashir Abad	14	/08/1970	donie donie donie donie
8	1	93	ĸ	han Bahader	GPS Mori Shalakai	0	2/02/1970	
9	_	198	A	bdu Rehman	GPS Kandroo	3	/3/1972	do
.10		20 20	N	lawab Khan	GPS Shatyal	. 4	/6/1972	do
ù		203	A	urang Zeb	GPS M.Garrison		5/01/196	5do
32	4	209	A	nwar Ali	OPS Ishpidar 2		3/5/1971	do
13	-	222	۸	Aiskeen Khan	GPS Dopk Bela		3/14/1973	do
34		231	Ľ	Abdur Rashid	GPS M.T.Q.S S:Abad		8/24/1972	do
15		238	_	Sher Afzal	GPS Ranolia		04/01/19;	do
1.16	j.	.23(		Jan 1 Mohammad	GPS Bankad	_	0\$/02/19	73do
1:	7	24	<u>  </u>	Sher Zada	GPS Khanai Ra	n:	0,5/03/19	73do
1	8.	26	2	M Arbab Kha	n GPS Hidar Aba	d • .	6/12/196	8 /do
. [	<u>9</u>	31	; , 	Ayoub Jan Muh: Zaher	GPS Harbon K	. 10	1/3/1971	do
2	io i	31	6	Shah Muhammad	GPS Muslim Ke	ot	1/1/1970	do
	21.	33	77	Jamil	GPS Kalbir		2/6/1971	i dodo
··\	2.2	3	51	Rahim Khan	GPS Dong Dat	ага	15/06/1	975do
- H+	23	3	96.	Gul Khan	GPS Mahreen		1/1/1970	5do
ŀ	24	3	97	Seyab Khan	<b>GPS Kuz Shar</b>	ial	2/12/19	76do

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J. PROMOTION OF SDM/DB/ TO	
Total No. of SST General (M) Posts vacant Posts 25% share initial recover	<u>.</u>
Total No. of SST General (M) Posts vacant Posts 25% share initial recruitment 75% share for Posts	<u>~~16</u>
70% share for Brone di	
4 % Share of monon.	

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4 % Share of promotion.       30         Posts available for promotion       91         Promoted through this order       05									<u> </u>	
	S.N o	S.L .N o	Naine of Qfficial	Present Place of Posting	Date of Birth	Remierks		b		
• •,	, 	3.	Fazal Rohim	GMS Razaka	3/1/1970	Services placed at the disposal of DEO (M) Kohistan for further posting against SST (General) post on school based.			-	
	2	27 36	'Shireen Dad Rasool Shah	GHSS Bataira GHS	20/2/1975	based.				
•	4.	42	Amirur Rahman	Sowar Steel GHS Chochang	1/1/1977 16/1/1974	do				. >
	ļ <u> </u>	47	Awal Khan	GHS Ranolia	2/1/1985	do	.	•		

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4. PROMOTION OF SATIAT TO THE POST OF SST (General) BPS-16.

25% share initial recruitment	
75% share for Promotion.	121
	30
Posts available for promotion Promoted through a second se	91
Promoted through this order	05
	05
S.No S.L Name of Present Place Date of	04

			Official	of Posting	Date of Birth	Remarks		
.	1	41 Muhammad Yahya		GHS Maidan Kolig		Services placed at the disposal of DEO (M) Kohlstan for further posting		
	2 ''	53 60	Gul	GMS Mahreen GHS Chakai	<u>`</u>	against SST (General) post on school based.		
					1/1/1979	do		
	3							
	4	72	llisanul		5/1/1976	do		
			Hog	GHS Kuz Paro	30/12/1074			

Terms and conditions:-.

They would be on probation for a period of one year extendable for another one year. They will be governed by such rules and regulations as may be issued from time to time by the They will be governed by such rules and regulations as may be issued from time to time by the Gout. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded under the rules framed there to time. Charge report should be submitted to all concerned. Their Inter-Se- seniority on lower post will remain intact. No TA/DA is allowed for joining his daty. They will give an under taking to be recorded in their service book to the effect that if any over he/She will be reversed. They will be converned by such rules and any time will be recovered and if he/she is wrongly promoted.

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They will be governed by such rules and regulations as may be issued from time to time by the Gour

They will be yoverned by such rates and regulation of the serve at the place of posting, and their service is not transferable to any other station.

10 Before handing over charge once again their document may be checked if they have not the required relevant quifications as per rules, they may not be handed over charge of the post.

(Muhammad Rafiq Khattak) Director Elemeniary and Secondary Education Khyber Pakhtunkhwa Peshawar. Copy forwarded for information and necessary action to the: Accountant General Khyber Pakhtunkhwa Peshawar. Accountant General Khyber Pakhtunkhwa Peshawar. District Accounts Officer concerned District Accounts Officer concerned District Accounts Officer concerned Copy for becretary to Gout: Khyber Pakhtunkhwa E&SE Department. FS to the Director E&SE Khyber Pakhtunkhwa Fesse M/File Dy: Director (Estab) Elemeniary dhd Secondary Education Khyber Pakhtunkhwa Peshawar

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2 20 Was. SST(G). Drech Dusi Atmess Ach Peshawan Same 0.0 Dersed م م mond Desre 3 2 Kinnin Submitted 5 Sam Bets 5 DSHT t 5 lin t Bech DIVISIO <u>L</u> 5 PSH7 ž Park hun いっての ž ž em/u) 0 ξ ŝ 5 ĥ مع Dromothone Ž 200 Seniory Emonall of Ssued q 262 2 3 Ś /5. þ σ, Educar adjusted S 2 Com ( No Kan Sericorily Oteo Sp Junior to 000 education Tear 5 J G d'he Point è o rave Meal Servi Fall 7 third nome of Khyber مرز Ø たらび 9 Mer T 2/23  $\mathbb{C}$ 5 E B 3431-ي ا partmental or 8 andon  $\mathfrak{P}$ Departmen light 4 on' 90 DPC not our and £ Aindo ment З С WILL 204 È 66 9 3 reguested with among ps t Seniorily 2 Å S -Toocler Bag18 Appeal 0 3 A.F. working t d もろして marit 2 Glove Yece Sept honew iest Bahadon deller dep Com 14 A Catter Ŕ Å end J olegerin Ø told Sas all Q Ś end A Day 22 t. light Cþ وم S S to ... 9 Denio r ତ୍ The ζt ŝ ean entony )e partment ard KWZ t a blived Roly Scruss ž 9 uolij 520 The いいて 0 ൭ ፈ offer nonion 3 δ 19.87 Khan Led 1 are S nues omoted Sthe The ک Divis(0 most 905 8 8 Į d g Prom 40 3 wext BiEd Ì 30 <del>,</del> s Y V/is C Ś P ERSE 2 Orders Shimmits J -0 S. U P32 DUNY 326 60 1 at کر The second 18 H 5000 4 | | Her ß Risir 70

#### BEFORE THE PESHAWAR HIGH BENCH ABBOTTABAD 3Rn

#### W.P.No. 559-A of 2016

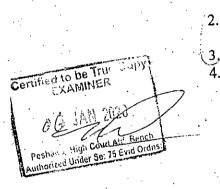
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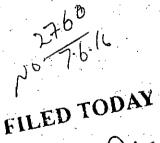
(1) Fazal Qadeem son of Haji Jaffar (P.S.H.T) Government Primary School Manzakhpa/ Bankad (2) Fazal Mehmood son of Umer Daraz (P.S.H.T) Government Primary School village Bankad (3) Umer Dad son of Balai (P.S.H.T) Government Primary School Soya Ranolia, Tehsil Pattan District Kohistan .....Petitioners

#### VERSUS

Government of Khyber Pakhtunkhwa through and Secondary Elementary Secretary Education, Peshawar. and Secondary Elementary Director Education, Khyber Pakhtunkhwa Peshawar. District Education Officer (Male), Kohistan. Sub-Divisional Education Officer (Male) Primary Kohistan. ......Respondents. WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC

**REPUBLIC OF PAKISTAN, 1973 FOR A** DECLARATION TO THE EFFEC THAT PROMOTION FROM OF REFUSAL P.S.H.T TO S.S.T OF THE PETITIONERS BY RESPONDENTS ON THE GROUND OF HAVING B.A/B.SC. (THIRD DIVISION) ILLEGAL, UNCONSTITUTIONAL, IS UNLAWFUL, WITHOUT LAWFUL AUTHORITY AND AGAINST THE JUDGMENT OF





Additional Registrar Pears or High Court

Abbottabad

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1.

# THIS HONOURABLE COURT PASSED IN WRIT PETITION NO.58-B OF 2014.

# PRAYER: -

On acceptance of the instant Writ Petition, the respondents be directed not to refuse promotion to the petitioners from P.S.H.T to S.S.T on the ground of having B.A (Third Division) and they be promoted from the date 31.10.2014, if they are otherwise entitled for the same on the basis of seniority cum fitness or any other writ or order as may deem fit and appropriate in the circumstances of the case, may also be issued/passed in favour of the petitioners.

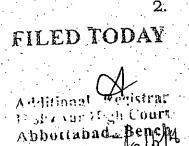
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Respectfully Sheweth!

1.

That, the petitioners are having qualifications of B.A (Third Division) /B.Ed from recognized institutions.

(Copies of educational testimonials are annexed as annexure "A").



That, the petitioner No.1 was appointed against the post of Primary School Teacher vide appointment order dated 11.05.1992 and he was promoted to the post of S.P.S.T BPS-14 and then against the post of P.S.H.T BPS-15 and the petitioner No.2 was appointed against the post of P.T.C vide appointment order dated 05.03.1996 and then he was promoted to the post of P.S.H.T BPS-15. Similarly, the petitioner No.3 was also appointment against the post of P.T.C vide appointment order dated 02.03.1987 and later on he was promoted to the post of P.S.H.T and since then, no promotion upward has been awarded to them on the ground of having B.A (Third Division).

(Copies of appointment orders and promotion orders of the petitioners are annexed as annexure "B", "C" & "D").

seniority list of the That, a upgradation of primary school. teachers was prepared on 31.10.2014 and the petitioners were denied promotion from the post of P.S.H.T to S.S.T on the ground of having B.A (Third Division) and juniors to the petitioners were promoted.

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Peshawarttigh Court Ald. Bench

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(Copy of the seniority list is annexed as annexure "E").



That, feeling aggrieved, the petitioners having no other adequate, efficacious and speedy remedy except to invoke the constitutional jurisdiction of this Honourable Court, inter alia, on the following grounds: -

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#### GROUNDS

. That, the petitioners are entitled for promotion from the post of P.S.H.T to S.S.T on the basis of seniority cum fitness and denial of the right of promotion on the ground of having Third Division is illegal, unlawful and discriminatory.

That, the imposition of condition of (2<sup>nd</sup> Division) for the B.A/B.Sc. purpose of promotion to the post of S.S.T vide notification No.SO (PE)4-5/SSRC/meeting/2013 was called in question before this Honourable court in Writ Petition No.58-B of 2014 in which the condition of B.A/B.Sc. (2<sup>nd</sup> Division) for the purpose of promotion to the post of S.S.T was declared illegal and subsequently this Honourable Court in Writ Petition No.1041-A of 2015 followed the judgment referred above.

(Copy of the Judgment is annexed as annexure "F").

That, similarly placed teachers have already been promoted to the post of S.S.T and their promotion orders having B.A (Third Division) has not been withdrawn which is clear violation of article-25 of the Constitution of Islamic Republic of Pakistan, 1973.

That, as per basic criteria of promotion, the petitioners are entitled to be promoted for the post of P.S.H.T to S.S.T on the basis of seniority cum fitness and denial/refusal on the part of the respondents on the ground of B.A (Third Division) is illegal, illogical, unreasonable and having no substance.

That, the petitioners have been rendering services in the capacity of Primary School Teachers for more than 20 years and the denial of further promotion on the ground of B.A (Third Division) is unjust an unfair especially, when this condition

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has already been declared illegal and unjustified by this Honourable Court.

It is, therefore, most humbly prayed that on acceptance of the instant Writ Petition, the respondents be directed not to refuse promotion to the petitioners from P.S.H.T to S.S.T on the ground of having B.A (Third Division) and they be promoted from the date 31.10.2014, if they are otherwise entitled for the same on the basis of seniority cum fitness or any other writ or order as may deem fit and appropriate in the circumstances the case, may also be of favour of the issued/passed in petitioners.

Dated 06.06.2016

Through

Fazal Qadeem etc. ...Petitioners

ABDUL SABOOR KHAM Advocate High Cour Mansehra.

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# PESHAWAR HIGH COURT, ABBOTTABAD BENG

FORM OF ORDER SHEET

Court of.....

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Case No.....of.

· · · · · ·					********	
Date of Order of Proceedings	Or	der or other Proce	edings with	Signatur	e of Judge (s)	
1			2	· . ·	<u> </u>	
13.02.2017	W.P.No. 55	9-A/2016.				
	Present:	Mr. Abdul petitioners.	Saboor	Khan,	Advocate,	for the
· · · · · · · · · · · · · · · · · · ·		Mr. Rab Nav	waz Khar	ı, AAG,	for the res <sub>j</sub>	pondents.

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<u>IKRAMULLAH KHAN, J.-</u> Through the instant constitutional petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 the petitioners have prayed as under:-

> "On acceptance of the instant writ petition, the respondents be directed not to refuse promotion to the petitioners from PSHT to SST on the ground of having BA (third division) and they be promoted from the date 31.10.2014, if they are otherwise entitled for the same on the basis of seniority cum fitness or any other writ or order as may deem fit and appropriate in the circumstances of the cuse, may also be issued / passed in favour of the petitioners."

2. In essence, the petitioners namely, Fazal Qadeem, Fazal. Mehmood and Umer Dad after having been appointed on different posts in the years 11.05.1992, 05.03.1996 and 02.03.1987 respectively in Education Department when completed their qualification upto Bachelor Degree applied for the post of PST but they have been refused their promotions with the plea that they did their graduations in third division which is against the policy to accord such post while on the other hand juniors to the petitioners have been promoted to the post of PST, hence the instant petition.

3. Comments in this case were sought from the respondents, who accordingly submitted their parawise comments wherein they have raised the same plea that the petitioners, having did their Bachelor Degree in third division, cannot be promoted to the desired posts.

4. Not only in a case titled "Muhammad Baqi Vs. The Government of Khyber Pakhtunkhwa through Secretary (Elementary & Secondary Education) Peshawar & 02 others" rendered in W.P.No. 1041-A/2015 on 05.04.2016 but also in another case decided by a Division Bench on 04.06.2015 this court has earlier declared the condition of having third division as null and void, which are still in the field and have not yet been challenged or set-aside by the Apex court, therefore, we deem it proper to allow the instant petition on the same analogy.

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5. For the reasons mentioned herein above, this petition is accepted and the respondents are directed to promote the petitioners to the post of SST and not to refuse their due rights of promotion from PSHT to SST on the ground of having BA

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(third division), if they are otherwise entitled for the same on

the basis of seniority-cum-fitness with immediate effect.

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## BEFORE THE PESHAWAR HIGH COURT, BENCH ABBOTTABAD

# W. P No, 1041 of 2015

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#### VERSUS

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Peshawai High Court Abbottabad Bench

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WRIT PETITION UNDER ARTICLE 199 READ WITH ARTICLE 25 OF THE **CONSTITUTION** OF ISLAMIC REPUBLIC OF PAKISTAN, 1973 FOR DECLARATION TO THE EFFECT THAT THE OF RESPONDENT NO.3 WHEREBY THE PROMOTION NOTIFICATION DATED 28.10.2014 WAS WITHDRAWN VIDE IMPUGNED NOTIFICATION DATED 24.04.2015 ON THE <u>GROUND</u> OF HAVING QUALIFICATION **OF B.SC** (3<sup>RD</sup> DIVISION) IS ILLEGAL, UNLAWFUL, WITHOUT LAWFUL UTHORITY.

Judgment Sheet IN THE PESHAWAR HIGH COURT, ABBOTTABAD BENCH JUDICIAL DEPARTMENT Writ Petition No. 1041-A/2015. JUDGMENT Date of hearing Petitioner Mahammau Ragi 4 mr. Aldu Respondents. Govto My. AAB ខុទ្ IKRAMULLAH KHAN, J.- Through the instant writ petition under Article 199 of the Islamic Republic of Pakistan, 1973 the petitioner seeks declaration to the effect that the act of ABAD W respondent No.3 whereby the promotion notification dated 28.10.2014 was withdrawn vide impugned notification dated 24.04.2014 on the ground of having qualification of B.Sc (3rd division) is illegal and without lawful authority and against the judgment of this court passed in W.P.No. 58-B of 2014.

2. In essence, the petitioner was initially appointed as Certified Teacher and, as per entitlement, later on promoted to the post of Senior Certified Teacher (BPS-16) vide notification dated 28.10.2014 whereafter the petitioner assumed the charge of the said post on 30.10.2014 and after performing his duties to the satisfaction of his competent authority, on 24.04.2015 respondent No.3 has passed the impugned notification and, as

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such, the promotion order of the petitioner was withdrawn on the ground of having B.Sc in third division.

Comments were called from respondent No.3, who filed 3. the same, averring therein that though petitioner was promoted to the post of SST vide notification dated 28.10.2014 by respondent No.2 but on scrutinizing his qualification documents, it was found that petitioner was not eligible for promotion to the post of SST being B.Sc third divisioner, hence, his promotion order was de-notified by the Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar and on the direction of Director the promotion order of the petitioner was withdrawn vide impugned notification dated 24.04.2015.

It has further been averred in the comments that 4. promotion order of the petitioner was withdrawn on the ground of B.Sc third division and it was done in light of policy circulated vide Notification No.SO(PE)4-5 / SSRC / meeting / 2013 / teaching cadre dated 24.07.2014 according to which the method of recruitment of SST was specified with a first condition of at least second class BA / B.Sc from a recognized University on need basis with two relevant subjects alongwith second condition of MA Education or B.Ed from the recognized University. Further averred that it is the prerogative of the government to enhance, modify or alter the promotion

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criteria / policy for the civil servants and a civil servant is not supposed to be treated with a set of rules of his own choice.
5. In response to Para-6 of the petition, respondent No.3 averred in the comments that the judgment of this court was announced on 04.06.2015 whereas the withdrawal order of the petitioner was passed on 24.04.2015, prior to the announcement of the judgment.

6. The main contention of learned counsel for the petitioner is that this court has already declared the condition of having third division as null and void in its judgment dated 04.06.2015 and the case of the petitioner is on better footing for the reason that in the referred judgment the petitioner had not been appointed but so far as the case of the petitioner is concerned, he was duly promoted rather received its benefits from 28.10.2014 to 24.04.2015 and thus, the impugned order is illegal, without lawful authority and jurisdiction.

7. Admittedly, the petitioner was duly promoted to the post in question on 28.10.2014 after the departmental promotion committee evaluated his case / PERs.

8. Now the question for determination before this court would be that when the petitioner actually performed his duties on the promoted post and that too for six long months, then how the respondent No.3 could withdraw the earlier promotion order only on the pretext of having B.Sc third division.

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8. It appears from the record that a Division Bench of this had already declared the condition of having third division as null and void in its judgment dated 04.06.2015 which fact has also been affirmed by the respondent No.3 in his comments by stating that they were not aware of that judgment at the time of withdrawal of the impugned promotion of the petitioner and when the case of the present petitioner is at par with that of the petitioner therein, rather on better footing because the petitioner was not only promoted to the post in question but he performed his duties for six long months and received its benefits, the impugned notification passed by respondent No.3 is required to be set at naugh.

9. It is also a well settled principle of law that once a benefit is granted to a civil servant, cannot be taken back from him and, if so, very stringent strong reasons are required for the same, which are not available in the case in hand, moreso, when the promotion order of the similarly placed teachers having B.Sc third division have not been so far withdrawn which is clearly violation of Article 25 of the Constitution of Pakistan.

10. For the reasons mentioned above, this petition is accepted and the impugned notification dated 24.04.2015 issued by respondent No.3 whereby the promotion order of the petitioner was withdrawn is declared to be without lawful

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CALCULAR STATE

# Directorate of Elementary and Secondary Education 93 Khyber Pakhtunkhwa Peshawar

SSTs (M) Kohistan

PH No. 091-9225340- 9225341, 9225338, 9225339 Fax 091-9225345 E-mail rafiq\_kk851@yahoo.com

Votification Consequent upon the Judgement of the Honurable Peshawar High Court, Abbottabad Bench rendered in W.P.# 5 59-A/2016 followed by COC No. 37-A/2017 and recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Sciondary Education Notification NoSO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24<sup>th</sup> July,2014, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) noted against each BPS-16 (Rs. 18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted by the District Education Officer concerned.

#### **A** SST (General)

A. DOI (Octor and and (Compared) BPS-16	
A. <u>DDI (OCHOFUE)</u> <u>1. PROMOTION OF SDM/DM TO SST (General) BPS-16.</u>	03
Tatal No. of SST General (M) Posts bacant 1 octo	0
25% share initial recruitment	03
	03
20% Share of promotion of PSH1/SFS1/101	03
Rosts anailable for promotion	03
Promoted through this order	

S. No	S.L. No	Name of Official	Place of Posting	Date of Birth	Date of Appointment as Regular DM	Qualific ation	Remarks Services placed at the
1	50	Fazal Mehmood	GPS, Bankad	05-03-1968-	14-11-1990	BA/B.Ed	Services placed at the disposal of DEO (M) Kohistan for further posting against SST (General) post.
2	73	Umar Dad	GPS, Kuz Soya (Ranolia)	01-05-1968	14-03-1991		do
$\left( \begin{array}{c} 3 \end{array} \right)$		Fazal Qadeem	GPS, Manz Akhpa (Bankad)	15-01-1971	25-05-1995		do

# Terms and conditions:-

The promotion of the above teachers to SST (General) BPS-16 posts is subject to the condition of th 1 judgment of august Supreme Court of Pakistan.

They would be on probation for a period of one year extendable for another one year

SSTs (M) Kohistan 2

They will be governed by such rules and regulations as may be issued from time to time by the

- Their services can be terminated at any time, in case their performance is found unsatisfactory Govt. during probationary period. In case of misconduct, they shall be preceded under the rules framed
- from time to time. Charge report should be submitted to all concerned.
- Their Inter-Se- seniority on lower post will remain intact.
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- They will give an under taking to be recorded in their service book to the effect that if any over No TA/DA is allowed for joining his duty. payment is made to him in light this order will be recovered and if he/she is wrongly promoted
- They will be governed by such rules and regulations as may be issued from time to time by the he/She will be reversed.
- Before handing over charge once again their document may be checked if they have not the required relevant qulifications as per rules, they may not be handed over charge of the post. 10

(Muhammad Rafiq Khattak) Director Elementary and Secondary Education Kiyber Pakhtunkhwa Peshawar

/ File No.2/Promotion SST B-16: Dated Peshawar the 16/ 11/2017. Endst: No. 317 Copy forwarded for information and necessary action to the: -

- Additional Registrar Peshawar High Court, Abbottabad Bench. District Education Officer (M) Kohistan.
- 1.
- District Accounts Officer Kohistan. 2.
- 3..
- PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department. 6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar. 4.
- 7. M/File

Director (Estab

Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

IN THE SUPREME COURT OF PAKISTA

(Appellate Jurisdiction)

#### PRESENT:

Mr. Justice Ijaz ul Ahsan

Mr. Justice Munib Akhtar

Mr. Justice Sayyed Mazahar Ali Akbar Naqvi

#### CIVIL APPEAL NO.2039 OF 2019 AND CIVIL PETITIONS NO.91 P AND 92-P OF 2016

(Against the judgments dated 13.02.2017/04.06.2015/08.12.2015 of the Peshawar High Court, Abbottabad Bench, Abbottabad/Peshawar High Court, Bannu Bench, Bannu passed in Writ Petitions No.559-A/2016, 58-B/2014 and 87-B/2014)

Government of KPK through Secretary (E & S) Education, Peshawar etc.

Versus

...Appellant(s)/Petitioner(s) (In all cases)

Fazal Qadeem etc. Waris Khan Yasmin

For the Appellant(s)/ Petitioner(s):

For Respondent No.1 & 2:

For Respondent No.2:

For the Respondent(s):

Date of Hearing:

In C.A.2039/2019 In C.P.91-P/2016 In C.P.92-P/2016 ...Respondent(s)

7242 7282

Mr. Zahid Yousaf Qureshi, Addl.A.G. Mr. Sharafat Khan, DDEO Mr. Muhammad Idrees, Litigation Officer Mr. Ashraf Ullah Khan, Legal Officer (In all cases)

Mr. Misbah Ullah Khan, ASC (In C.A.2039/2019)

Nemo (In C.A.2039/2019)

Not represented [In C.Ps.91-P & 92-P/2016]

06.04.2022

ORDER

<u>Ijaz ul Ahsan, J.-</u> Civil Appeal No.2039/2019 by leave of the Court arises out of a judgment of the Peshawar High Court dated 13.02.2017. Through the impugned judgment, the learned High Court by relying on two other judgments of the same High Court rendered in Writ Petition No.1041-A/2015 and a Division

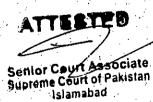
Senior Court Associate Supreme Court of Pakistan Islamabad Civil Appeal NO.2039 of 2019 and Civil petitions NO.91-p and 92-p of 2016 -:2

Bench judgment dated 04.06.2015 has directed the appellants to promote the respondents to the post of SST and not to refuse their due right of promotion from PSHT to SST on the ground of having passed their BA examination in the 3<sup>rd</sup> division.

At the very outset, we have asked the learned counsel 2 for the respondents as to how the petitions were maintainable before the learned High Court in view of the fact that admittedly the respondents are civil servants and the stance taken by the appellants that the respondents are not qualified for such promotion. The learned High Court has erroneously proceeded on the premise that the matter relates to fitness of the respondents and, therefore, the Tribunal lacked jurisdiction to adjudicate the matter. We are unfortunately unable to agree with the said view. It is clear and obvious to us that lack of qualification does not have any nexus to fitness for promotion. Consequently the matter being of qualification or lack thereof relates to terms and conditions of service fell within the purview of jurisdiction of the Federal Service Tribunal and the bar on the jurisdiction on the High Court in terms of Article 212 of the Constitution of Islamic Republic of Pakistan was fully attracted.

3. In this view of the matter, the judgment of the learned High Court is unsustainable. It is accordingly set aside. The appeal is accordingly allowed.

4. We note that Civil Petition No.92-P/2016 has been filed against a judgment of the Peshawar High Court dated 08.12.2015 in Writ Petition No.87-B/2014 titled "Mst. Yasmin Vs. Government of Khyber Pakhtunkhwa etc." and Civil Petition No.91-P/2016 against a judgment of the Peshawar High Court dated 04.06.2015 in Writ Petition No.58-B/2014 titled "Waris Khan Vs. Govt. of Khyber Pakhtunkhwa and 05 others". We have also been informed that the judgment in the case titled "Muhammad Baqi Vs. Government of Khyber Pakhtunkhwa through Secretary (Elementary &

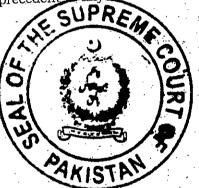


Secondary Education), Peshawar and 02 others" which has been relied upon by the Peshawar High Court in the impugned judgment was challenged before this Court but was dismissed on account of limitation and was not decided on merits.

PPEAL NO.2039 OF 2019 AND CIVIL PETITIONS NO.91-P AND 92-P OF 2016

Civil Petitions No.91-P and 92-P/2016 have been filed 5. beyond the period of limitation. The applications for condonation of delay (C.M.As.No.149-P and 151-P/2016) do not disclose any sufficient cause that may constitute basis within the contemplation of the Limitation Act, 1908 for condonation of delay. Consequently, the applications for condonation of delay are dismissed. The petitions are dismissed as barred by time. It is, however, clarified that the judgment dated 08.12.2015 rendered in Writ Petition No.87-B/2014 titled "Mst. Yasmin Vs. Government of Khyber Pakhtunkhwa etc.", judgment dated 04.06.2015 rendered in Writ Petition No.58-B/2014 titled "Waris Khan Vs. Govt. of Khyber Pakhtunkhwa and 05 others" and the judgment dated 05.04.2016 rendered in Writ Petition No.1041-A/2015 titled "Muhammad Baqi Vs. Government of Khyber Pakhtunkhwa through Secretary (Elementary & Secondary Education), Peshawar and 02 others" shall not be used as

other case. preceder



	CR No:	Civil/Criminal
<u>Islamabad, the</u> 6 <sup>th</sup> of April, 2022	Date of Presentation: 6-4	-0
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# UNIVERSITY OF SARGODHA

M:A Islamiat Composite 1st Annual 2021



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Roll No 39400

Registration No 18-US-P-38689

Candidate Name Umer Dad

Father's Name Balai

RESULT Pass 502

RESULT DECLARED 31-03-2022 ON

This result is a notice only.

### BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. \_\_\_\_ /2022

Mr. Umar Dad, SST (General) (BPS-16), GMS Chari Shabi Khel, District Lower Kohistan.

·····.APPELLANT

#### VERSUS

- 1- The Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director Elementary & Secondary Education Department, Khyber
   Pakhtunkhwa, Peshawar.
   2 The Director Elementary & Secondary Education Department, Khyber
- 3- The District Education Officer, District Lower Kohistan.
- 4- Mr. Khan Bahader, SST (General) (BPS-16) c/o of District Education District Lower Kohistan.

..... RESPONDENT

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION 16-11-2017 WHEREBY THE APPELLANT WAS PROMOTED TO THE POST OF SST (GENERAL) (BPS-16) WITH IMMEDIATE EFFECT AND NOT FROM THE DUE DATE I.E <u>28/10/2014</u> WHEN JUNIOR COLLEAGUE <u>HIS</u> WAS PROMOTED AGAINST THE INACTION AND OF RESPONENTS BY NOT DECIDING THE DEPARTMENAL APPEAL THE OF THE APPELLANT WITHIN THE STATUTOY PERIOD OF NINETY DAYS.

PRAYER:

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That on acceptance of this appeal the impugned notification dated 16-11-2017 may very kindly be modified/ rectified to the extent that the appellant may please be promoted w-e-f 28-10-2014 i.e. w.e.f when he was eligible for promotion as well as his junior colleague was promoted to the subject post with all back benefits including seniority. Any other remedy which this August Tribunal deems fit that may also be granted in favor of the appellant.

#### R/SHEWETH: ON FACTTS:

1- That appellant was initially appointed as PTC vide order datd 02-03-1986 in the respondents department and is serving the respondents department with zeal and zest and up to the entire satisfaction of his superiors. Copy of the appointment order dated 02-03-1986 is attached as annexure 2- That initially the appellant get his Bachelor recognized university in the Third Division in the year 1991. Copy of of Arts from the BA degree is attached as annexure ......B.

3- That according to the seniority list of the respondents department the appellant was senior to the private respondent No. 4 at the time of making promotion and the appellant was quite hopeful for his promotion to the post of SST (General) (BPS-16) but the appellant was ignored on the basis of having third division in BA. Copy of the seniority list is attached as annexure .....C.

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4- That the respondents vide notification dated 24-07-2014 have notified the service rules/ structure whereby vide serial No. 1B (f), 20 percent quota has been allocated for the appellant cadres. Copy of 

5- That vide notification dated 28-10-2014 private respondent No. 4 being junior to the appellant was promoted to the post of SST (General) (BPS-16) and the appellant was ignored on the basis of having third division in Bachelor of Arts. Copy of notification dated 28/10/2014 is attached as annexure .....E.

6- That appellant feeling aggrieved from the inaction of the respondents by not promoting him to the post of SST (General) (BPS-16) vide mentioned notification preferred departmental appeal followed by writ petition 559-A/2016 before the Peshawar High Court, Abbottabad Bench which was accepted vide judgment dated 13-02-2017 in light of the judgment passed in writ petition No. 1041 /2015. Copies of the departmental appeal, judgment dated 13-02-2017 and dated 05-04-2016 are attached as annexure ......F, G &H.

7- That in compliance of the judgment dated 13-02-2017 the appellant was promoted to the post of SST (General) (BPS-16) vide notification dated 16-11-2017 but with immediate effect and not w-e-f 28-10-2014 when his junior/ private respondent No. 4 was promoted to the subject post. Copy of the notification dated 16-11-2017 is attached as annexure .....I.

8- That respondents challenged the judgment supra before the apex court of Pakistan in CP No. 2039/2019, and the apex court set aside the judgment of the Peshawar high court on the ground that the appellant was civil servant and he was supposed to approach to the service tribunal. Copy of the judgment of the apex court is attached as annexure .....J.

9- That during pendency of the case before the apex court of Pakistan. the appellant has improved his qualification by obtaining Master in Islamiat in 1<sup>st</sup> division and thus the last obtained degree is not in the ambit of 3<sup>rd</sup> division. Copy of the result card is attached as annexure ·····K

- 10- That the appellant feeling aggrieved from notification dated 16-11-2017 whereby the appellant was promoted with immediate effect and not w-e-f 28-10-2014 when his junior/ private respondent No. 4 was promoted to the subject post preferred departmental appeal but the same has not been decide within the stipulated period of ninety days. Copy of the departmental appeal is attached as annexure
- 11- That feeling aggrieved and having no other remedy the appellant preferred the instant appeal on following grounds inter alia.

#### GROUNDS:

- A- That the impugned notification dated 16-11-2017 whereby the appellant was promoted to the post of SST (GENERAL) (BPS-16) with immediate effect and not from the date i.e. 28/10/2014 when his junior colleague/ private respondent No. 4 was promoted is against law, facts, norms of natural justice and material on record hence liable to be modified/ rectified.
- B- That appellant has not been treated by the respondent department in accordance with law and rules on the subjected noted above and as such respondents violated the Article 4 and 25 of the Constitution of Islamic Republic of Pakistan.
- That the appellant has been discriminated by the respondents while issuing the impugned notification dated 16-11-2017 whereby the appellant was promoted to the post of SST (GENERAL) (BPS-16) with immediate effect and not from the date i.e. 28/10/2014 when his junior colleague/ private respondent No. 4 was promoted.
- D- That the respondents acted in arbitrary and malafide manner while issuing impugned notification.
- E- That the impugned notification is in derogation of section-8 and section-9 of the Civil Servant Act, 1973 read with rule 7 and rule 17 of the APT rules, 1989, therefore not tenable and liable to be rectified/ modified.
- F- That the impugned notification is also in complete derogation of Article 38(e) of the Constitution of Islamic Republic of Pakistan, 1973, therefore not tenable and liable to be modified/ rectified.
- G- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 22.04.2022

E ÎQ j APPELLANT dad UMAR DAD ROUGH: 17 NOOR MUHAMMAD KHATTAK THROUGH: KAMRAN KHAN 2 UMAR FAROOQ ADVOCATES

#### BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

#### SERVICE APPEAL NO.\_\_\_\_/2022

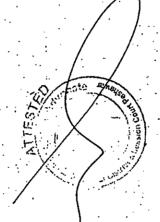
#### UMER DAD

#### EDUCATION DEPTT:

#### AFFIDAVIT

**/S** 

Stated on oath that the contents of the accompanying service appeal are correct to best of my knowledge and belief and nothing has been concealed from this Honorable Service Tribunal.



dad DEPONENT

CERTIFICATE:

Certify that no earlier service appeal has been filed by the appellant in the instant matter before this Honorable Service Tribunal.

lad CERTIFICATION

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	 /2022

UMAR DAD

#### **GOVT: OF KPK & OTHERS**

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#### APPLICATION FOR RESTRAINING THE RESPONDENTS NOT TO WITHDRAW THE PROMOTION NOTIFICATION DATED 16.11.2017 OF THE APPELLANT TILL THE FINAL DISPOSAL OF THE INSTANT APPEAL

#### R.SHEWETH:

- 1. That, the appellant has filed the above titled service appeal along with this application before this Honorable Tribunal in which no date has so far been fixed.
- 2. That, appellant filed the above mentioned service appeal against the notification dated 16.11.2017 whereby the appellant has been promoted with immediate effect rather than with retrospective effect i.e. w.e.f 28.10.2014.
- 3. That, all the three ingredients required for grant of stay are in favor of the appellant.
- 4. That, any other ground would be taken at the time of arguments with prior permission of this Honorable Tribunal.

It is therefore, most humbly prayed that on acceptance of this application the respondents may kindly be restrained not to with draw the impugned notification dated 16.11.2017 till the disposal of the instant service appeal.

APPELLANT -

UMAR DAD

THROUGH: NOOR MOHAMMAD KHATTAK ADVØCATE, SUPREME COURT

70 ANNEX \_ M The Centary Elementary Seemany Edu (55 Jaap ber palla ten tehnte Departmental Appeal againt The implymed Notefication I dated Subject. 16-11-2017 GN, The appellant is Sering as SST (4) The appellant is Sering That as per The Education Department . That as per Certaity & weis on the top of weiting list for provistion to the post of SCT(S) Doneener, 9 was not gree promotion from retrospective date bet g due date il 28/10/ rather & nos promoted with insometicate effect rather & nos primer to me the primeted which cilledris primer to me the is injustice which cilledris primer to me, which is injustice with professional to me, which is injustice in the Deepes of low & natural justice Forgoing a view, it is nequested that I defende prinotion as SST (4) with affect 28-to-my instead g immediate affect So the Notification dated 16-11-2017 may please he modified / rectyred to may please he modified / rectyred to the estert to promote me with effect fro 28-10-2014 (due dete), as 9 was fro 28-10-2014 (due dete), as 9 was eligible pro promotion and colleagues eligible pro were promoted. All bolen definite to me promoted. All bolen formation to me promoted. per browled to the appellent ypeers; dediently A. S. S. Umar Dad SCT(G) CAMS Chari Dated Shabi Whel, DISTI Loover Udobistan



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATON KHYBER PAKHTUNKHWA PESHAWAR

#### OFFICE ORDER

The Competent Authority (Director Elementary & Secondary Education Khyber Pakhtunkhwa), is pleased to withdraw the Promotion Order bearing No. 3117-23 dated 16-11-2017 to the extent of the following SSTs only, in the light of the decision of the August Supreme Court rendered in CP No. 2039/2019 and the judgment of High Court Peshawar Abbottabad Bench set aside on 06-04-2022, as reported by DEO (M) Kohistan Lower vide letter No.3980 dated 24-08-2022.

S.No	Name	Promoted From	Promoted to
1	Mr. Umar Dad	PSHT BPS-15	SST (G) BPS-16-5
2	Mr.Fazal Mahmood	PSHT BPS-15	SST (G) BPS-16 but retired on 31-03-2019 vide No. 9905-8 dated 06-04-2019

#### DIRECTOR

Elementary & Secondary Education Khyber Pakhtunkhwa

"N" .56

Endst: No\_\_\_\_\_\_ F.NO.WP-559-A /2016/Fazal Qadeem VS Govt. of KPK Dated the Peshawar 21. [23] 2023

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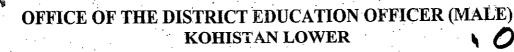
25-25

- 1. District Education Officer (M) Kohistan Lower.
- 2. District Accounts Officer Kohistan Lower.
- 3. Officials concerned.
- 4. Master Copy

Assistant Director (Estab-M1)

20

Elementary & Secondary Education



Email.deokohistanl@gmail.com

Face Book: DEO Male Kohistan Lower

#### ADJUST ORDER

The promotion order of Mr.Umardad PSHT to SST (G) bearing No.3117-23 dated 16-11-2017 has been withdrawn Vide Director E&SÉ KPK No .2635-37 date 26-12-2022 in the light of the decision of the august Supreme court rendered in CP No.2039/2019,

Therefore, Mr. Umardad is hereby adjusted as PSHT against the vacant post at GPS Chari Shbikhel in BPS .15 with effect from 06-04-2022, (date of Judgment)

#### (Zahoor Khan) District Education Officer (Male) Kohistan Lower

Endst: No.  $\frac{75679}{DEO}$  (M) KH-L/Estab: F-No.21/Dated:  $\frac{OD}{D}$  / $\frac{D}{2023}$ Copy forwarded for information and necessary action to the: -

- 01. Deputy Commissioner Kohistan Lower.
- 02. Dy: DEO (M) KH-L may please stop the pay.
- 02: Assistant Director (Estab-M1) E&SE Khyber Pakhtunkhwa, Peshawar.
- 03. Sub-Divisional Education Officer (M) Barkad Kohistan Lower with the direction to complete the requisite cod**e** formalities accordingly and ensure recovery oppover payments.
- 04. District Accounts Officer Kohistan Lower.
- 05. District Monitoring Officer (EMA) Kohistan Lower.
- 07. Focal Person (HRIMS) update the same on Portal.
- 08. Official concerned.
- 09. Office file.

Dy:District Education Officer (Male)

His Highness,

To

Secretary to Government of KPK,

Elementary and Secondary Education Department.

Diary NO 1834 - "/". patel. 9/2/2023 - 58-

Peshawar

Appeal against the order No 2635-37 dated 26-Sub: 12-2022, and No 7586-94 dated 22-2023, issued by director E&SE. and DEO (male) Kolai palas kohistan respectively.

Elementary & Secondary Edu: Deptit. COVELUMENT OF KHYDEL CSKHUNKHWA

Humbly I beg to your honor, that I am serving in education deptt. Since 14-3-1991

> Initially appointed as PST, then SPST, then PSHT, and currently working as SST(G) at GMS chari shabai kheeel lower kohistan.

> My qualification is MA IInd division, and B.Ed., but in BA(third division).

> In 2014, many colleagues junior to me were promoted to SST, but I was refused to promote for the cause third division BA.

> Being aggrieved this, I gone into a writ petition before the honorable Peshawar high court(Abbottabad bench), writ petition No 559/2016, and the honorable high court

ordered as "for the reason mentioned above, this petition is *decepted and the respondents are directed to promote* the petitioners to the post of SST and not to refuse their rights of promotion from PSHT to SST on the ground of having BA(third division)"

- In compliance of the above judgments, vide endost. No 3117-23 dated 16-11-2017, the director elementary and secondary education KPK, issued my promotion ordered PSHT to SST(G).
- The Deptt. Gone into CPLA, the august supreme court of Pakistan disposed of the appeal with the view that this matter relates to service tribunal.(judgment is attached).
- In the light of views of supreme court of Pakistan, I filed a service applied before honorable service tribunal vide appeal No 656-2022, along with the application for restraining the respondents not to withdraw the promotion notification dated 16-11-2017 of the appellant till the final disposal of instant appeal.
- This appeal has been accepted before honorable KP service tribunal, reply comments were also been called from the respondents but reply comments are not submitted by the Deptt. Into the honorable KP service tribunal yet.

R/Sir, while the application, restraining the respondents to pass any adverse orders been accepted before honorable KP service tribunal, notices been issued to respondents, at this stage, without prior approval of the service tribunal, withdrawal orders mentioned in the subject, is against the law full authority, deemed court contempt and against the natural justice, against the norms of fundamentals rights and is against the employees rights.

It is requested the subject orders may be canceled till the disposal of the service appeal before the KP honorable service tribunal.

Thanks.

y und and 9/2/203 Umer dad ex SST GHS chari

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Umer dad ex SST GHS chari shbakahil lower kohistan

#### <u>VAKALATNAMA</u>

61-

### BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Wear OF 2023

Umar Dad

(APPELLANT) \_ (PLAINTIFF) (PETITIONER)

#### **VERSUS**

(RESPONDENT) Education Drott (DEFENDANT) Allelant I/We

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

Dated.\_\_\_/\_\_/2023

**OFFICE:** Office TF 291-292, 3<sup>rd</sup> Floor, Deans Trade Centre, Peshawar Cantt: Mobile No.0345-9383141

Ú CLIENT ACCEPTE **NOOR MOHAMMAD KHATTAK ADVOCATE SUPREME COURT** . Nb-Ê Kanroan Kligy, UMar Farson, Valeed Advan Advocats.