


1st Nov., 2022

Counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

02. Learned counsel for the appellant requests for adjournment in order to further prepare the brief. Last opportunity is granted. To come up for arguments on 15.12.2022 before the D.B.



(Fareeha Paul)
Member (E)



(Kalim Arshad Khan)
Chairman

15.12.2022

Due to general strike of the Bar, case is adjourned to 06.03.2023 before D.B. Office is directed to notify the next date on notice board as well as the website of the Tribunal.

SCANNED
KPST
Peshawar

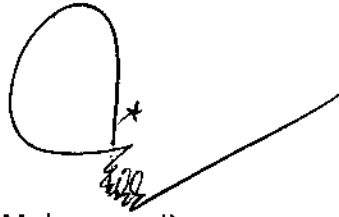

(Fareeha Paul)
Member (E)


(Rozina Rehman)
Member (J)

20.04.2022

Learned counsel for the appellant present. Mr. Muhammad Riaz Paindakhel, Assistant Advocate General for the respondents present.

Learned Counsel for the appellant seeks adjournment in order to properly assist the court. Last chance is given to the counsel of appellant to prepare the case failing which it will be decided on the basis of available record. To come up for arguments on 15.06.2022 before D.B.



(Mian Muhammad)
Member (E)




Chairman

15.06.2022

Clerk of counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Clerk of counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to some domestic engagement. Adjourned. To come up for arguments on 01.08.2022 before the D.B.




(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

1-8-2022

Proper DB not available the case is adjourned to 1-11-2022


Reader

07.10.2021

Clerk of learned counsel for the appellant present. Mr. Muhammad Rashid, DDA for respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel is not available today. Granted. To come up for arguments on 06.01.2022 before the D.B.



(Mian Muhammad)
Member(E)



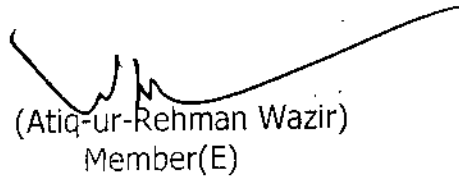
Chairman

P

06.01.2022

Clerk to counsel for the appellant present. Mr. Javed Ullah, Assistant AG for the respondents present.

Clerk to counsel for the appellant requested for adjournment on the ground that his counsel is not available today, due to general strike of the bar. Adjourned. To come up for arguments before the D.B on 20.04.2022.



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




Chairman

23.06.2021

Mr. Changaiz Khan, Advocate, junior of learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Peshawar. Adjourned. To come up for arguments before the D.B. on 07.10.2021. The appellant is directed to submit Member copy before the date fixed.


(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

07.10.2021

~~Clerk of learned counsel for the appellant present. Mr. Muhammad Rashid, DDA for respondents present.~~

~~Learned counsel for the appellant requested for adjournment on the ground that he is being closely engaged. Granted. To come up for arguments on 06.01.2022 before the D.B.~~

Chairman

(Mian Muhammad)
Member (L)

24.03.2021

Counsel for the appellant and Mr. Noor Zaman Khattak,
District Attorney for the respondents present.

Learned counsel seeks time to further prepare the brief.
Adjourned to 23.06.2021 for hearing before the D.B.

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

Chairman


Postscript

26.05.2021

The order dated 24.03.2021 was written but could not be signed by the D.B including the then Chairman who due to unforeseen reason could not attend the office in coming days. He died in the meantime and the order sheet was left unsigned. To bring the proceedings of appeal on track, it is become expedient for ex-post facto completion of the order sheet. The unsigned order dated 24.03.2021 is reproduced below which be given effect accordingly:-

"Counsel for the appellant and Mr. Noor Zaman Khattak, District Attorney for the respondents present.

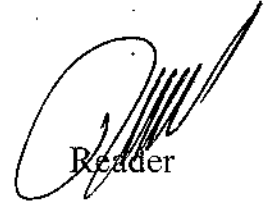
Learned counsel seeks time to further prepare the brief. Adjourned to 23.06.2021 for hearing before the D.B."


(Atiq-ur-Rehman Wazir)
Member


Chairman

09.06.2020

Bench is incomplete as one learned Member (J) is on leave. Therefore, the case is adjourned. To come up for the same on 20.08.2020 before D.B.


Reader

20.08.2020


Due to summer vacation, the case is adjourned to 22.10.2020 before D.B.


Reader

22.10.2020

Junior to counsel for the appellant and Addl. AG for the respondents present.

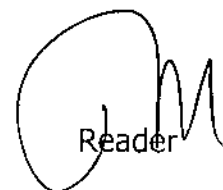
The Bar is observing general strike today, therefore, the matter is adjourned to 22.12.2020 for hearing before the D.B.


(Mian Muhammad)
Member


Chairman

22.12.2020

Due to COVID-19, the matter is adjourned to 24.3.21 for the same.


Reader

14.11.2019

Appellant absent. Learned counsel for the appellant absent. Clerk to counsel for the appellant present. Mr. Usman Ghani learned District Attorney for the respondents present. Clerk to counsel for the appellant seeks adjournment as counsel for the appellant is not available today. Adjourn. To come up for arguments on 17.01.2020 before D.B. Appellant be put to notice for the date fixed.



Member



Member

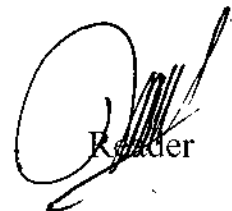
17.01.2020 . . . Clerk to counsel for the appellant present. Lawyers community is on strike on the call of Khyber Pakhtunkhwa Bar Council. Learned Member (Executive) is not available. Adjourned for 24.03.2020 before D.B.



Member

25.03.2020

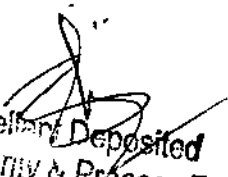
Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 09.06.2020 before D.B.



Reader

29.04.2019


Appellant in person present and submitted an application for submission of security and process. Application is allowed with the direction to submit the same within one week, thereafter, notices be issued to the respondents for submission of written reply/comments. Case to come up further proceedings on 27.06.2019 before S.B.


Appellant Deposited
Security & Process Fee


(Ahmad Hassan)
Member


27.06.2019

Learned counsel for the appellant present. Written reply not submitted. Shakeel Ahmad Superintendent (for respondent No.2) and Hayat AD (for respondents No.3 & 4) absent. Respondents as well as absent representatives be put to notice with direction to furnish written reply/comments. Adjourn. To come up for written reply/comments on 22.08.2019 before S.B.


Member

22.08.2019

Learned counsel for the appellant present. Mr. Kabirullah Khattak learned Additional Advocate General alongwith Mr. Munir Ahmed SST for the respondents No. 5 present and submitted written reply. Representative of the respondents stated at the bar that the remaining respondents relies on the same. Adjourned. To come up for rejoinder and arguments on 14.11.2019 before S.B.


(Hussain Shah)
Member

11.02.2019

Clerk to counsel for the appellant present and seeks adjournment as learned counsel for the appellant is not in attendance. Adjourn. To come up for preliminary hearing on 15.03.2019 before S.B


Member

15.03.2019

Learned counsel for the appellant present, preliminary argument heard.

The appellant (CT) has filed the present service appeal being aggrieved against the promotion criteria to the post of SST. Learned counsel for the appellant argued inter-alia that the appellant could never be promoted to the post of SST on the ground that his subject combination in B.Sc is Botany, Zoology and Geography instead of Botany or Zoology alongwith Chemistry.

Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for written reply/comments. To come up for written reply/comments on 29.04.2019 before S.B.


Member

16.08.2018

Mr. Akram Jan, Advocate put appearance on behalf of counsel for the appellant and made a request for adjournment as senior counsel was busy before Daar-Ul-Qaza Swat. Granted. Case to come up for preliminary hearing on 20.09.2018 before S.B.



Chairman

22-9-2018 Due to Muharram, holidays,
Case was not heard on 20-9-18.
Adj for 12-11-2018


Chairman

21-11-18

12-11-2018

Due to Retirement of Honorable
Chairman the Tribunal is non functional
therefore the case is adjourned to
come up for the same on 31-12-2018

Chairman

31.12.2018

Neither appellant nor his counsel present. Notice be issued to appellant and his counsel for attendance and preliminary arguments for 11.02.2019 before S.B.

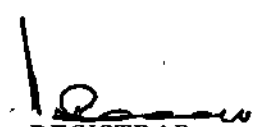

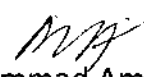


Muhammad Amin Khan Kundi
Member

Form-A

FORM OF ORDERSHEET

Court of _____

Case No. 572/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	25/04/2018	<p>The appeal of Mr. Ahsanullah resubmitted today by Syed Ghufuranullah Shah Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 25/4/18</p>
2-	15/05/18.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>22/05/18.</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	22.05.2018	<p>None present on behalf of the appellant. Adjourned. To come up for preliminary hearing on 17.07.2018 before S.B.</p> <p style="text-align: right;"> (Muhammad Amin Khan Kundi) Member</p>
	17.07.2018	<p>Mr. Akram Jan Junior to counsel for the appellant present and seeks adjournment on the ground that senior counsel for the appellant is not in attendance. Adjourned. To come up for preliminary hearing on 16.08.2018 before S.B.</p> <p style="text-align: right;"> Member</p>

SCANNED
KPST
Peshawar

The appeal of Mr. Ihsanullah s/o Muhammad Failqoos Khan r/o Gulberg No. 1 Peshawar received today by i.e. on 26.03.2018 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of departmental appeal is not attached with the appeal which may be placed on it.
- 2- Annexures of the appeal may be attested.
- 3- Annexures of the appeal may be flagged.
- 4- Wakalat nama in favour of appellant is not attached with the appeal.
- 5- Seven more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 642 /S.T.

Dt. 27/03 /2018

Ihsanullah
REGISTRAR 27/3/18
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Syed Ghufanullah Shah Adv. Pesh.

Respected Sir,

In response to your above office objection I may kindly be granted more time extended to remove the said objections.

Ihsanullah
4/18

7 days time extended.

Respected Sir,

Requested second time extension of time to re-file the subject case.

7 days time further extended.

Ihsanullah
19/4/18

In the compliance of this office
objection NO I it is stated that
the departmental representation was
not to the competent authority before
filing of this writ petition.

And that the stated writ
petition/Service appeal is being
filed under information of and
Instruction of the Honorable High
Court in wp no 373/15.

Therefore requested
to put before the bench.

Sd/-
24/4

**BEFORE THE KHYBER PAKHTUNKHUWA SERVICE TRIBUNAL
PESHAWAR**

Service Appeal No. 572 2018

Ihsan Ullah

VERSUS

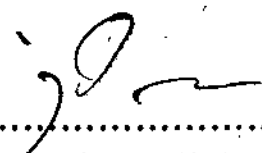
Chief Secretary Govt: of KPK, Peshawar and others

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S.No.	Description of Documents	Annexure	Pages
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3	Addresses of parties		9
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5	Copies of Educational Testimonials	"B"	12-15
6	Copy of Appointment Letter	"C"	16
8	Copy of impugned Notification	"D"	17-23
9	Copy of seniority list	"E"	24-34
10	Copy of Order/Judgment of Peshawar High Court, <i>Comments</i>	"F"	35-58 59-60
11	Wakalat Nama		✓


Appellant

Through


.....
Syed Ghufan ullah Shah
(Advocate Peshawar)
Office; 22-A Nasir Mansion
Railway Road, Peshawar
Cell No.0334-9185580

①

**BEFORE THE KHYBER PAKHTUNKHUWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No. 572 2018.

Ihsan Ullah

S/O Muhammad Failqoos Khan,

Presently residing at Room No.10,

Dir Maidan Palace, Gulberg 1, Peshawar Cant.

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 4521

Dated 26-3-2018

.....Appellant

VERSUS

1. Government of Khyber Pakhtunkhaw through Chief Secretary at Civil Secretariat, Peshawar.
2. Secretary to Government of Khyber Pakhtunkhaw, Elementary and Secondary School Education Department, Civil Secretariat Peshawar.
3. Director Elementary & Secondary Education Government of Khyber Pakhtunkhaw Peshawar.
4. Deputy Director (Establishment) Directorate of Elementary & Secondary Education Khyber Pakhtunkhaw Peshawar.
5. EDO Elementary & Secondary Education Distt: Chitral.

.....Respondents.

Filed to-day

Registrar

26/3/18

Appeal U/S 4 of KPK, Service Tribunal Act 1974

Prayer:

Re-submitted to -day
and filed.

Registrar

25/4/18

On acceptance of the instant Service Appeal, the
impugned Notification bearing No. SO (PE) 4-
5/SSRC/Meeting/2003/Teaching Cadre, Peshawar dated
24-07-2014 issued by respondent No. 2 to the extent of
addition of consideration of Bachelor (BSC) Degree with

2

two subjects as Chemistry, Botany and Zoology for promotion to SST (BPS-16) under 40% quota specified for Senior/Certified Teachers (SCT/CT) by excluding the appellant having bachelor degree (B.Sc) of subject combination as Zoology, Botany and Geography; be declare against the scheme of promotion on the basis of seniority cum fitness and all such acts and omissions of respondents with effect to exclude the appellant from the process of promotion to SST (BPS-16) under 40% quota for the reason of such subject combination in B.Sc Degree (although having qualification of B.Ed, M.Ed and ma along with 14 years relevant experience) may also be declare as void *ab initio*, illegal, unlawful, without lawful authority and justification; hence appellant be promoted in accordance with his seniority. Any such relief which this honourable Tribunal deems proper and just be granted to the appellant against the respondents keeping in view the circumstances of the case.

Respectfully Sheweth;

Brief facts and grounds giving rise to the instant service are as under;

1. That in the year,1991 the appellant passed his Bachelor Degree in Science (B.Sc) with subject combination of Botany, Zoology and Geography as a regular candidate from Government Degree College Chitral and was awarded Bachelor of Science Degree from University of Peshawar.
(Copy of Original Degree along with DMC is annexed as Annexure "A")

3

2. That in the year, 1995 the appellant passed professional Course for Certified Teacher (CT-General) from Government Elementary College Chitral. Furthermore the appellant also possess his professional Degree of Bachelor of Education (B Ed) and Master of Education (M.Ed) granted by Allama Iqbal Open University Islamabad beside Master of Arts (M.A) granted by University of Peshawar.

(Copies of Educational Testimonials are Annexure "B")

3. That the appellant was appointed as Certified Teacher (CT-BS-09) on 20-03-2004 Vide Notification Endorsement bearing No. 996-901/EB/SECY/APPTT issued by Respondent No.7.

(Copy of Appointment Letter is Annexure "C")

4. That after consideration and acceptance of his higher and professional qualifications as well as his experience in terms of service benefit; the petitioner has been up graded from time to time at the same cadre and presently working at BPS-15 as Senior Certified Teacher. It is also pertinent to mention here that the appellant has been granted special allowances in shape of advance increments applicable for higher education in the subject cadre.

5. That although the appellant has been upgraded in the same cadre of post i.e. CT but never promoted to the next cadre throughout his career of 14 years Service i.e. 20-03-2004 till date due to variation in Government policies from time to time.

6. That in the year, 2014 Secretary to Government of Khyber Pakhtunkhaw/Respondent No.2 issued the impugned Notification bearing No. So (PE) 4-5/SSRC/Meeting/2003/Teaching Cadre, Peshawar Dated 24-07-2014 whereby in pursuance of the provision contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhaw Civil Servants (Appointment, Promotion and Transfer Rules, 1989) a criteria for appointment against Secondary School Teacher BPS-16 has been prescribed and consequently 40% quota has been specified for Senior /Certified Teachers in the following manner;

(u)

(a) *forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years Service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in column No.3:*

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

(Copy of impugned Notification is annexed as Annexure "D")

7. That resultantly for the purpose of promotion of Certified Teachers Respondent No.5 has issued final Seniority List at District Level whereby the appellant was in good position to be promoted in the next higher post of Senior English Teacher (SET-BPS-16). Furthermore 18/19 years of his service is remaining for superannuation retirement according to present retirement policy which is expected to extend further.

(Copy of seniority list is annexed as Annexure "E")

8. That Senior Certified Teacher having required rather much more experience of 11 years and B.Ed as well as M.Ed Degree along with other higher education, Service Book/file of the appellant was required to be forwarded by Respondent No.4 to Respondent No.3 for promotion to SST (BPS-16) through general Official proceedings.

9. That during following his promotion case; Appellant was informed by the office of Respondent No.3 that he cannot be considered for promotion to SST (BPS-16) for the reason that he cannot meet the prescribed qualification under the impugned Notification to the extent that his subject combination in B.Sc is Botany, Zoology and Geography instead of Botany or Zoology along with Chemistry.

5

10. That the appellant filed a Writ Petition bearing No.WP.No.373-P/2015 before the Peshawar High Court Peshawar, which was disposed on 24-01-2018, whereby the appellant has been advised to approach this honourable Tribunal.

(Copy of Order/Judgment of Peshawar High Court is annexed as Annexure "F")

11. That as a matter of right and having no other remedy; the appellant approaches this honourable Tribunal inter alia on the following amongst the following others;

GROUND:

- A. That admittedly the Appellant has been awarded BSc Degree in the year 1991 by recognized and chartered University i.e. University of Peshawar without any if and but neither there any illegality or irregularity to choose subject of Botany, Zoology and Geography as subject combination nor there any restriction upon the appellant to choose such combination for grant of B.Sc degree and if there any notification regarding such issue; than to give retrospective effect of such notification by virtue of impugned Notification dated 24-07-2014 is not maintainable in the eyes of Law.
- B. That in the year, 1991 when appellant was granted B.Sc Degree and even till day of impugned Notification in 2014 there was no adverse effect of Subject Combination in B.Sc as Botany, Zoology and Geography as major subjects of Bio Science on relevant academic and employment requirements, that's why the appellant has been awarded B.Ed and M.Ed Degree, otherwise he would not have adopted Education as profession.

(b)

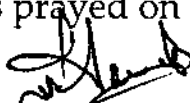
Therefore it is mandate of Principal of Policy embodied in the Constitution of Islamic Republic of Pakistan, 1973 to formulate notification/rules and policies in accordance with the secure rights of the citizens and each and every administrative act of respondent No.2 contrary to such rights is void *ab initio*; hence require judicial interference and modification.

- C. That operation of the impugned Notification with effect to consider the appellant unfit for promotion in the year, 2014 for the reasons of his subject combination at B.Sc passed in 1991 and that's too when otherwise he is Senior Cum fit on the basis of service record and is also SST trained; is in clear cut violation of Article, 27 of the Constitution with its heading "Safe Guard against discrimination in service" therefore the same is against the vested rights of the petitioner.
- D. That through the impugned Notification Respondent No.2 has not only miss interpret Rule-3 of Civil Servants (Appointment, Promotion and Transfer Rules,1989 but also failed to frame a legal procedure required for promotion, therefore the same is not warranted by law, procedure and applicable Rules.
- E. That the impugned notification is in itself contrary to law because where requirement of a post is special training (B.Ed) along with required experience and seniority, than to categorize subjects at B.Sc is illegal, therefore all subsequent proceedings and actions taken thereon would have no basis and would fall.
- F. That in light of Article, 212 of the Constitution as well Order of the Peshawar High Court, this hohourable Tribunal has ample power to entertain the subject matter.

(7)

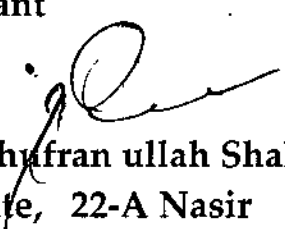
G. That the appellant seeks leave of this honourable Tribunal to argue/raise additional grounds at the time of arguments.

It is, therefore, most humbly prayed that the instant service appeal be accepted as prayed on the heading.



Appellant

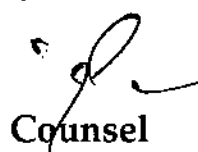
Through,



Syed Ghufuran ullah Shah
Advocate, 22-A Nasir
Mansion, Peshawar

CERTIFICATE:

It is certified that no other service appeal on the same subject has been filed before this honourable Tribunal.



Counsel

8

BEFORE THE KHYBER PAKHTUNKHUWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____ 2018

Ihsan Ullah

VERSUS

Chief Secretary Govt: of KPK, Peshawar and others

AFFIDAVIT;

I, **Ihsan Ullah** S/O Muhammad Failqoos Khan, Presently residing at Room No.10, Dir Maidan Palace, Gulberg 1, Peshawar Cant., Appellant do hereby solemnly affirm and declare on Oath that the contents of the service appeal; are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Honourable *Tribunal*.

Ihsan Ullah

Deponent

CNIC No. 15202-0812323-9

Verified by;

Syed Ghufraan Ullah Shah

Syed Ghufraan ullah Shah
(Advocate Peshawar)



9

BEFORE THE KHYBER PAKHTUNKHUWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____ 2018

Ihsan Ullah

VERSUS

Chief Secretary Govt: of KPK, Peshawar and others

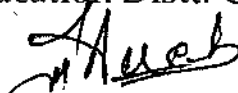
ADDRESSES OF PARTIES

APPELLANT;

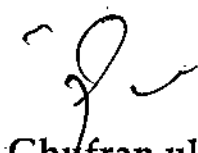
Ihsan Ullah S/O Muhammad Failqoos Khan, Presently residing
at Room No.10, Dir Maidan Palace, Gulberg 1, Peshawar Cant.

RESPONDENTS;

1. Government of Khyber Pakhtunkhaw through Chief Secretary
at Civil Secretariat, Peshawar.
2. Secretary to Government of Khyber Pakhtunkhaw, Elementary
and Secondary School Education Department, Civil Secretariat
Peshawar.
3. Director Elementary & Secondary Education Government of
Khyber Pakhtunkhaw Peshawar.
4. Deputy Director (Establishment) Directorate of Elementary &
Secondary Education Khyber Pakhtunkhaw Peshawar.
5. EDO Elementary & Secondary Education Distt: Chitral


Appellant

Through,


Syed Ghufan ullah Shah
Advocate-Peshawar

of _____
held in _____

Serial _____

Registered _____

Roll No. _____

Result Decl: _____

1-18
Controller of Examinations
University of Peshawar

Attested
Head Master
G.H.S Reshman

Attested

Better Copy - 11

UNIVERSITY OF PESHAWAR
(PAKISTAN)

No. 030439

Detailed marks certificate

B.Sc Part-II Examination 1991 (Annual/Supplementary)

Mr/Ms. Ihsanullah

Roll No. 21219

The candidate secured the following marks and has been placed in Second Division.

SUBJECTS	M A R K S		
	O B T A I N E D		
	MZXIMUM	In Figures	In Words
Botany	75	38	Thirty Eight
Zoology	75	28	Twenty Eight
Geography	75	35	Thirty Five
Pakistan Study	40	22	Twenty Two
B.Sc Part-I (Result)	285	134	One Hundred & Thirty Four
	550	257	Two Hundred & Fifty Seven

The Examination was taken as a whole / In Parts

Date 24-07-1998

Ihsanullah

Controller of Examinations.
University of Peshawar

DETAIL MARKS CERTIFICATE.

TRAINING CLASSES EXAMINATION C. T. (GENERAL) 199

Roll No. 207 Name Muhammad Son/Daughter of Muhammad Fair

Serial No.	SUBJECTS	Max. Marks	Marks Obtained		TOTAL
			Int.	Exter.	
1.	Theory and History of Education	100			65
2.	Child Development	100			80
3.	School and Community Development	100			68
4.	General Methodology and preparation of Teaching Aids.	100			71
5.	Counselling Testing and Evaluation	100			57
6.	Organization of Elementary Education of School Management	100			79
7.	English	100			69
8.	Science	100			58
9.	Social Studies	100			74
10.	Islamiyat	100			77
11.	Practice of Teaching	100			165
G. Total					863

Passed/Failed _____

Division T

To Re-appear in _____

Attested
Principal
G.H.S Reshun
Chitral

1. _____
2. _____
3. _____

Prepared by _____

Checked by _____

Date of declaration of Result 9/1/95

[Signature]

DETAIL MARKS CERTIFICATE

TRAINING CLASS EXAMINATION C.T. (GENERAL) 199

Roll No. 207 Name. Ihsan Ullah Son/Daughter of Muhammad Failqoos Khan

Serial No.	SUBJECTS	Max Marks	Marks Obtained		Total
			Terl	Exierl	
1	Theory and History of Education	100			65
2	Child Development	100			80
3	School and Community Development	100			68
4	General Methodology and Preparation of Teaching Aids	100			71
5	Counseling Teaching and Evaluation	100			57
6	Organization of Elementary Education of School Management	100			79
7	English	100			69
8	Science	100			58
9	Social Studies	100			74
10	Islamiyat	100			77
11	Practice of Teaching	100			165
	G.Total				863

Passed/Failed-----

Division.....

To Re-appear in

1. _____

2. _____

3. _____

Prepared by _____

Checked by _____

Roll No. E-6875035

Aligarh Muslim University
Aligarh Open University



27698

علامہ اقبال ان اوپن یونیورسٹی

ISMAILULLAH

Regn. No. 96-HOL-0012

احسان اللہ

son/daughter of MUHAMMAD FAIYOOS KHAN

محمد فیقوس خان

having completed the prescribed requirements

in SPRING 19 97 is awarded the degree of

Bachelor of Education

He/She secured 60 % marks and was placed

in B grade.

گیماسی

ف

نمبر ۶۰

کے ذریعہ اس کی

Vice Chancellor

دیس پانچ

Islamabad

Dated: 21st MAR, 1998

Controller of Examinations

کنٹرولر امتحانات

۲۱ مارچ ۱۹۹۸ء

This degree is to be read in conjunction with the Transcript, issued separately.

اس ڈگری کو الگ الگ

with the Transcript, issued separately.

16
University of Peshawar
(Pakistan)

SESSION ANNUAL 1998

14
of IMSAN ULLAH SON OF MUHAMMAD FAJROOS and a student
held in DISTRICT CHITRAL having passed the prescribed examination
APRIL, 1999, is this day admitted by the University of Peshawar

to the Degree of
Master of Arts

in the SECOND / DIVISION.

The Subject of Examination being ISLAMIYAT

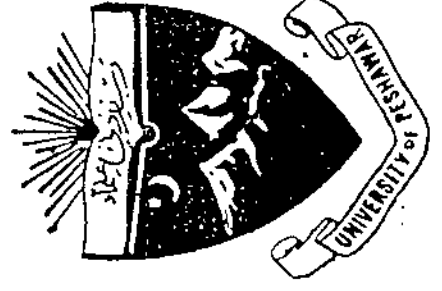
The Examination was taken as a whole / in parts

Serial No: 025892

Registration No. 89-CL-670

Roll No. 17329

Result declared on SEPTEMBER 13, 1999



M. H. S. Nishtar
Head Master
H.S. Nishtar

M. A. Khan
Registrar

Countersigned

M. A. Khan
Vice-Chancellor

Roll No. J 6645214

Aligarh Muslim University
Aligarh
Open University

1934



عزائم اقبال افسانہ یونیورسٹی
بیرنگر

IHSANULLAH

Regn. No. 96 NOL OUT 2

احسان اللہ

son/daughter of MUHAMMAD FAILOOS KHAN

محمد فیلقووس خان

having completed the prescribed requirements
in SPRING 19 2001 is awarded the degree of

بی اے
مدرسہ علم برائے حفاظت مکمل کر کے

M. Ed.

He/She secured 57 % marks and was placed

in B grade.

کے ڈیو معامات گئی اس نے ۵۷ فیصد نمبر لے کر

Head Master
M.S.

Vice Chancellor

Fajid

Salambahad
Dated: 08TH JUL, 2003

Result declared on, 16TH APR, 2002

Controller of Examinations

This degree is to be read in conjunction with the Transcript, issued separately.

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۱۶ اپریل ۲۰۰۳

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OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS AND
LIT: CHITAL

Officer Order.

Consequent upon their selection by the District Recruitment Committee, appointment of the following (Male) CTs is hereby ordered in BPS-09 Rs.2410/- plus usual allowances, on contract basis initially for a period of three years w.e.f their taking over charge, in the best interest of public service subject to the terms and conditions noted below:-

(25% OPEN MERIT)

SNO	NAME/PARENTAGE & ADDRESS	MARIT SCORE	PLACE OF POSTING	REMARKS
1/3	Mazhar Hussain S/O Ghulam Hussain R/O Charun	57.08	GHS Harchine	A.V CT Post
2/4	Ihsanul Haq S/O Muhammad Aziz R/O Shishi Koh	56.83	GMS Tar	A.V CT Post
3/6	Mujeebur Rehman S/O Saifur Rehman R/O Denin	55.54	GMS Beori	A.V CT Post
4/10	Ihsanullah S/O M.Failqoos Khan R/O Shogram	54.70	GHS Chitral	A.V CT Post

TERMS AND CONDITIONS

1. Their appointment is purely contract and they are liable to termination at any time on one months notice.
2. They will be governed by such rules/regulations issued by the Govt from time to time
3. They should produce health and age certificates form MS DHQ Hospital Chitral.
4. They should signed contract agreement before taking over charge.
5. They should take over charge within 20 days.
6. Charge reports should be submitted to all concerned
7. Their posting is school specific/non-transferable

APPROVED

8. Their original Degree/Certificates will be verified from the concerned universities/ Boards.

Any dis-information detected later on will result to their termination from service

9. No. TA/DA is allowed.

10. They should not be handed over charge if their age exceeds to 38 years.

(SHER DIL AMAN)
Executive District Officer
School & Literacy Chitral

Endst No. 896-901 / EB / SECY: / APPTT: Dated Chitral the 20-03-14
Copy forwarded to the:-

1/- District Coordination Officer Chitral with reference to his No. 3739 dt: 20-03-14

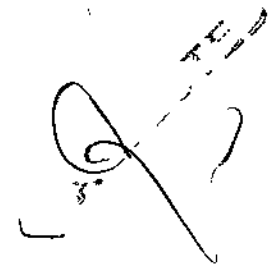
2/- Director of Schools & Literacy NWFP Peshawar

3/- district Accounts Officer Chitral.

4/- Principals / HMs concerned.

5/- middle Section Local Office

6/- Candidate concerned.



Executive District Officer
School & Literacy Chitral



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th 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 Notifications No.SO(G)S&L/D/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:-

(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 (BPS-17)	i. At least second class Master's Degree or four years BS Degree in the relevant subject; and ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualification from a recognized University.	23 to 35 years	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-16), with at least five years service as such and having qualification mentioned in column No. 3.

Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial



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			recruitment; and (b) fifty percent by initial recruitment.
IA Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	22-35 years	(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No. 3: Provided that if no suitable person is available from amongst Senior Physical Education Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Physical Education Teachers, with at least five years service as such and having qualification mentioned in column No. 3: Note:- If no suitable candidate is available in the relevant cadres of the above teachers the post falling in their promotion quota shall be filled by initial recruitment; and (b) fifty percent by initial recruitment; and

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(ii) against Serial No. 1B, as so renumbered, for the existing entries, the following shall be substituted, in respective columns, namely:

1	2	3	4	5
1B.	Secondary School Teacher (BPS-16)	<p>I. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology), Or (b) (Physics, Maths "A" or "B" or Statistics) Or (c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or MA Education or equivalent qualifications from a recognized University.</p>	21 to 35 years.	<p>1. Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner:</p> <p>(a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in column No.3:</p> <p style="text-align: center;">Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(b) four per cent from amongst the Senior Drawing Masters(BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3;</p>

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				<p>Provided that if no suitable candidate is available from amongst Senior Drawing Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(c) four per cent from amongst the Senior Arabic Teachers(BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, and having qualification mentioned in column No.3;</p> <p>Provided that if no suitable candidate is available from 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;</p> <p>(d) four per cent from amongst the Senior Theology Teachers(BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3;</p>
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				<p>Provided that if no suitable candidate is available from 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;</p> <p>(e) Three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst the Senior Qaris then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Qaris with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(d) twenty per cent from amongst the Primary School Head Teachers (BPS-15), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3:</p> <p>Provided that if no suitable candidate is available from amongst</p>
--	--	--	--	--

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			<p>Primary School Head Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No.3:</p> <p>Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as such and having qualification mentioned in column No.3; and</p> <p>(ii) twenty Five percent by initial recruitment.</p> <p>Note:</p> <p>I. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.</p> <p>II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately."</p>
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SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION 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.
3. 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 and 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, ESRI 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 Account 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 EK&SE Khyber Pakhtunkhwa. Peshawar.
21. PS to Secretary EK&SE Khyber Pakhtunkhwa. Peshawar.
22. Master file


(ZASIR KHALIMOMAND)
SECTION OFFICER (PRIMARY)
ATTENDED
(7)

11/11

FINAL SENIORITY LIST OF CT (MALE) IN ELEMENTARY & SECONDARY EDUCATION CHITRAL CORRECTED UPTO 31/10/2014

S#	Serial- No.	Name	Father's Name	BPS No.	Acad- Qualif.	Subject	Prof. Qualif.	Division	Date of birth	Domicile	D/O 1st entry into Govt. Service	D/O appt: in the present post	Place of posting
1	2	3	4	5	6	7	8	9	10	11	12	14	15
1	1	Saif Ullah	Abdul Karim	16	BA	2nd Div.	CT	2nd Div	15/03/55	Chitral	24/10/74	24/10/74	GHS: Balach
2	2	Mas Murod Khan	Zar Murod	16	BA	2nd Div.	CT/B.Ed	2nd Div	01/02/54	Chitral	29/04/72	21/10/75	GHS: Mastuj
3	3	Yornas Panah	Afzar	16	BA	2nd Div.	CT	2nd Div	11/02/54	Chitral	29/04/72	21/10/75	GHS: Mastuj
4	4	Mirza Wali Khan	Door Khan	16	BA	2nd Div.	CT	2nd Div	01/03/55	Chitral	25/10/75	10/09/76	GHS: Khot
5	5	Muhammad Aql	Jangi Khan	16	BA	3rd Div.	CT/Aggr/B.Ed	3rd Div.	16/02/60	Chitral	09/11/82	09/11/82	GHS: Arkari
6	6	Abdul Jaili	Abdul Hai	16	BA	2nd Div.	CT/1.Ant	2nd Div	03/01/59	Chitral	12/11/82	12/11/82	GHS: Ayun
7	7	Fazil Qadir	Fazal Mohd	16	BA	2nd Div.	CT/B.Ed	2nd Div	15/04/60	Chitral	20/11/82	20/11/82	GHS: Warjun
8	8	Shah Jee	Mohd Amin Shah	16	BA	3rd Div.	CT/Aggr/B.Ed	3rd Div.	02/01/58	Chitral	03/03/82	07/10/83	GHS: Hone
9	9	Gul Ahmed Din	Mir Zaman Shah	16	BA	2nd Div.	CT/Aggr	2nd Div	15/01/61	Chitral	01/11/83	01/11/83	GHS: Balach
10	10	Mohd Karim Khan	M. Rahim Khan	16	MA	Islamiyat	CT/B.Ed	2nd Div	15/05/63	Chitral	01/11/83	01/11/83	GHS: Khot
11	11	Abdul Khalil	Mohd Syed Baig	15	SSC	2nd Div.	CT	2nd Div	10/04/54	Chitral	08/12/77	16/01/84	GHS: Werkup
12	12	Roshan Mohd	Khosh Mohd	15	BA	2nd Div.	CT/Agro	2nd Div	06/01/58	Chitral	01/06/78	04/10/84	GHS: Ashirate
13	13	Said Mohd	Mehrab Wali	16	BA	2nd Div.	CT/1.Ant	2nd Div	14/11/61	Chitral	04/10/84	04/10/84	GHS: Ayun
14	14	Mohd Hamidullah	Zaid Ullah Khan	16	BA	2nd Div.	CT	2nd Div	20/07/54	Chitral	30/03/74	01/12/84	GHS: Koghuzi
15	15	Akbar Zaman Khan	Haji Akbar Khan	16	BA	2nd Div.	CT	2nd Div	17/01/63	Chitral	12/10/85	12/10/85	GHS: Kosht
16	16	Anwar ur Rehman	Mustafa Kamal	16	BA	2nd Div.	CT/B.Ed	2nd Div	04/01/64	Chitral	17/03/84	15/06/86	GHS: Kosht
17	17	Mohd Aziz Khan	M. Nadir Khan	16	BA	3rd Div.	CT/B.Ed/Aggr	2nd Div	07/01/66	Chitral	30/09/86	30/09/86	GHS: Booni
18	18	Latifur Rehman	Sher Zaman	16	BA	3rd Div.	CT/1.Ant	2nd Div	01/03/64	Chitral	01/10/86	01/10/86	GHS: Morlast
19	19	Fazal Waheed	Abdul Hakim	15	FA	2nd Div.	CT/Aggr	2nd Div	19/11/59	Chitral	07/12/77	15/12/86	GHS: Broze
20	20	Abdul Ghafoor	Murad Ali Khan	16	BA	2nd Div.	CT/B.Ed	2nd Div	06/06/55	Chitral	11/11/83	01/06/87	GHS: Werkup
21	21	Gazi Rafiq Ahmad	Khadim Dastagir	16	MA	Islamiyat	CT/B.Ed	2nd Div	01/01/60	Chitral	19/04/81	01/10/87	GHS: Kessu
22	22	Majeed Ahmad	Sher Mohd	16	BA	2nd Div.	CT/B.Ed/Aggr	2nd Div	01/04/57	Chitral	07/12/77	18/10/87	GCMHS: Chitral
23	23	Shams ud Din	Pukhtoon Wali Khan	16	MA	Islamiyat	CT/B.Ed	2nd Div	01/11/57	Chitral	05/01/80	20/10/87	GMS: Kriji
24	24	Noor Rehmat Shah	Abdul Karim Shah	16	BA	2nd Div.	CT/B.Ed	2nd Div	16/02/61	Chitral	01/09/82	29/11/87	GHS: Madak
25	25	Khadim Hussain	Hamayal Shah	16	MA	Islamiyat	CT/B.Ed	2nd Div	09/02/56	Chitral	12/12/82	29/11/87	GHS: Mastuj
26	26	Rahmat Sahib Khan	Mir Sahib Khan	16	BA	3rd Div.	CT/B.Ed	2nd Div	09/02/62	Chitral	10/03/83	29/11/87	GHS: Koghuzi
27	27	Abdul Jahon Khan	Abdul Murod Khan	16	BA	2nd Div.	CT	2nd Div	25/02/54	Chitral	01/04/83	29/11/87	GHS: Shahgram
28	28	Asaqal Khan	Nawab Khan	16	BA	2nd Div.	CT/B.Ed	2nd Div	09/03/65	Chitral	11/05/84	29/11/87	GCMHS: (B) Chit
29	29	Sher Afzal	Murad Khan	16	BA	2nd Div.	CT/B.Ed	2nd Div	12/02/64	Chitral	01/12/87	01/12/87	GHS: Sonoghore
30	30	Afzal Shah	Syed Abbas Shah	16	BA	3rd Div.	CT	3rd Div	02/09/64	Chitral	20/12/87	20/12/87	GHS: Arkari
31	31	Rahmat Ali	Doulat Khan	16	BA	3rd Div.	CT	3rd Div	01/08/54	Chitral	17/10/77	27/02/82	GHS: Mori
32	32	Sher Yasub	Wezir Khan	15	FA	2nd Div.	CT	3rd Div		Chitral			

As above
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As above
Promoted SST (9)
Promoted SST
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33	Syed Jalal Shah	Muslim	16	BA	2nd Div:	CT/B.Ed	2nd Div	14/04/64	Chitral	01/05/84	01/08/88	GHS: Rech
34	Sanif ur Rehman	Sajjad Hussain	16	BA	2nd Div:	CT	2nd Div	20/06/60	Chitral	18/10/84	01/08/88	GHS: Werkup
35	Amir Karim Khan	Muradi	16	MA	Islamiyat	CT/M.Ed	2nd Div	12/01/63	Chitral	24/10/84	01/08/88	GHS: Kushuni
36	Qudrat Ullah Baig	Sher	16	BA	2nd Div:	CT/B.Ed	2nd Div	02/03/57	Chitral	19/11/84	01/08/88	GHS: Chuinj
37	Mohd Naidr Khan	Mohammad	16	MA	Islamiyat	CT/B.Ed	2nd Div	15/02/62	Chitral	01/12/88	01/12/88	GHS: Charun
38	Maqbool Ahmad	Shah Bool Wali	16	MA	Urdu	CT/B.Ed	2nd Div	03/07/61	Chitral	12/10/86	26/08/89	GHS: Mastuj
39	Rahmat ud Din	Quwat Khan	16	MA	P/Sc	CT/B.Ed	2nd Div	06/05/61	Chitral	29/08/89	29/08/89	GHS: Booni
40	Mohd Saif un Nabi	Sifat Khan	16	MA	Islamiyat	CT/B.Ed	2nd Div	01/05/63	Chitral	01/01/83	01/09/89	GHS: Koghuzi
41	Hakim Khan	Nazim Shah	16	BA	2nd Div:	CT	2nd Div	01/02/60	Chitral	02/09/89	02/09/89	GHS: Khot
42	Fazal Rabbi	Shah Azmat Khan	16	BA	2nd Div:	CT/B.Ed	2nd Div	16/01/66	Chitral	11/09/89	11/09/89	GHS: Muzhgole
43	Abdul Hakam	Abdul Karim	15	BA	2nd Div:	CT	2nd Div	01/01/56	Chitral	07/10/74	20/09/89	GHS: Barum Owir
44	Nasir ud Din	Wali Zar Khan	16	BA	2nd Div:	CT	2nd Div	13/01/63	Chitral	14/11/81	01/10/89	GHS: Kujju
45	Mohd Afzal	Faramuz Khan	16	BA	2nd Div:	CT	2nd Div	07/08/56	Chitral	21/02/82	01/10/89	GHS: Kujju
46	Asmar Ullah	Gul Zarin	16	BA	2nd Div:	CT/B.Ed/Agr	2nd Div	06/08/63	Chitral	21/05/87	01/10/89	GHS: Istrau
47	Nafas Jalal	Taj Wali Khan	16	MA	Islamiyat	CT/B.Ed	2nd Div	16/10/61	Chitral	12/12/89	12/12/89	GHS: Chuinj
48	Nayeb Ahmad Kh	Sayed Ahmad Khan	16	MA	P/Sc	CT	2nd Div	10/09/60	Chitral	20/12/89	20/12/89	GHS: Reshun
49	Mahmoor Khan	Durani Khan	16	MA	Islamiyat	CT/B.Ed	2nd Div	05/10/59	Chitral	10/11/85	17/01/90	GHS: Brep
50	Mohd Nabi	Amir Wali Khan	16	MA	Islamiyat	CT/B.Ed	2nd Div	12/02/69	Chitral	27/09/89	17/01/90	GCMHS: (B) Cht.
51	Amir Muhd Khan	Ghulam Mohd Kh	16	MA	Islamiyat	CT/B.Ed	2nd Div	12/11/59	Chitral	16/12/86	01/02/90	GHSS: Shahgram
52	Noor Baiz Khan	Jam Mosh	16	MA	Islamiyat	CT/B.Ed	2nd Div	05/02/64	Chitral	01/08/82	01/04/90	GHS: Werkup
53	Hadi Khan	Ali Rahmat Khan	16	BA	3rd Div:	CT/B.Ed	2nd Div	02/02/61	Chitral	11/12/82	16/04/90	GHS: Chuinj
54	Mir Faraz Khan	Shahadat	15	BA	2nd Div:	CT	2nd Div	12/06/57	Chitral	01/04/84	14/11/90	GHSS: G/Chashma
55	Baber Ahmad	Sardar Ahmad	16	MA	Islamiyat	CT/B.Ed	2nd Div	08/01/62	Chitral	12/05/85	14/11/90	GHSS: Mori Lasht
56	Mohd Khan	Aliman Shah	16	BA	2nd Div:	CT	2nd Div	09/03/59	Chitral	10/11/85	14/11/90	GHS: Gohkir
57	Rahmat Qadir Khan	Bakht Khan	16	BA	2nd Div:	CT/B.Ed	2nd Div	01/04/64	Chitral	10/11/85	14/11/90	GCMHS: (B) Cht:
58	Imtiaz Ahmad	Sardar Ahmad	16	BA	2nd Div:	CT	2nd Div	10/08/59	Chitral	22/03/86	14/11/90	GHSS: Mori Lasht
59	Zia ud Din	Siraj ud Din	16	BA	2nd Div:	CT/B.Ed	2nd Div	04/07/63	Chitral	18/10/87	14/11/90	GCMHS: (B) Cht:
60	Sartaj ud Din	Bahader Khan	16	MA	Islamiyat	CT/B.Ed	2nd Div	15/06/57	Chitral	16/10/82	01/03/91	GHS: Ashirat
61	Mohd Alamgir Khan	Mohd Salim Khan	16	BA	2nd Div:	CT/B.Ed	2nd Div	01/02/59	Chitral	10/12/84	01/03/91	GHS: Kari
62	Ghulam Mohd	Mir	16	BA	2nd Div:	CT	2nd Div	30/01/67	Chitral	01/02/91	01/02/91	GHS: Reshun
63	Ibrahim Shah	Shokoori	16	BA	2nd Div:	CT	2nd Div	02/08/67	Chitral	01/03/91	01/03/91	GHS: B/Owir
64	Baksh Ali Khan	Tari	16	BA	2nd Div:	CT/B.Ed	2nd Div	22/02/66	Chitral	01/03/91	01/03/91	GHS: Shoghur
65	Nisar Ahmad	Sher Wali Shah	15	FA	2nd Div:	CT	2nd Div	10/05/63	Chitral	01/03/91	01/03/91	GMS: Hert
66	Mohd Javeed	Amir Shah	16	MA	Urdu	CT/M.Ed	2nd Div	15/09/65	Chitral	01/03/91	01/03/91	GCMHS: (B) Chitral
67	Zia ur Rehman	Inayat ur Rehman	16	MSC	P/Std	CT/M.Ed	2nd Div	10/11/65	Chitral	01/03/91	01/03/91	GHS: Broze
68	Aziz Rehmat	Rehmat Hussain	16	MA	Islamiyat	CT/M.Ed	2nd Div	20/10/66	Chitral	01/03/91	01/03/91	GHS: Sonoghur
69	Mohd Zafar ud Din	Sher Gul	16	MA	Islamiyat	CT/B.Ed	2nd Div	08/03/67	Chitral	01/03/91	01/03/91	GCMHS: (B) Cht:
70	Abdul Ghani	Mohd Azim Khan	16	BA	2nd Div:	CT	2nd Div	09/08/67	Chitral	01/03/91	01/03/91	GHSS: Shahgram
71	Abdul Nasir Shah	Ali Murad Shah	16	MA	Islamiyat	CT/M.Ed	2nd Div	15/01/68	Chitral	01/03/91	01/03/91	GHSS: Drosh

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72	Muhtd Ilyas	Arab Shah	16	BA	2nd Div:	CT/B.Ed	2nd Div	01/02/69	Chitral	01/03/91	01/03/91	GHS: Werkup
73	Khalid Zafar	Shahzada Khan	16	MA	Islamiyat	CT/M.Ed/Agri	1st Div:	06/12/69	Chitral	01/03/91	01/03/91	GHS: Ayun
74	Syed Jamal ud Din	Alim ud Din	16	BA	2nd Div:	CT/B.Ed	2nd Div	25/09/65	Chitral	02/03/91	02/03/91	GHS: Lonkoh
75	Manzoor Jalal	Hamid Jalal	16	MA	Islamiyat	CT/B.Ed	2nd Div	02/01/67	Chitral	02/03/91	02/03/91	GHS: Broze
76	Adina Khan	Iqbal Ali	16	BA	3rd Div:	CT	2nd Div	01/04/57	Chitral	19/11/84	22/10/91	GHS: Shoghore
77	Murtaz Ahmad	Zar Mohd	16	BA	2nd Div:	CT/B.Ed	2nd Div	08/05/61	Chitral	23/10/86	22/10/91	GHS: Werkup
78	Aziz Rehmat Khan	Afias Khan	16	MA	Islamiyat	CT/B.Ed	2nd Div	01/04/59	Chitral	26/10/86	22/10/91	GHS: Mastuj
79	Muhib Ullah	Safayat ulah	16	BA	2nd Div:	CT	2nd Div	11/04/64	Chitral	02/02/87	22/10/91	GHS: Balach
80	Sher Muhtd Khan	Bilavar Khan	16	BA	2nd Div:	CT	2nd Div	23/03/62	Chitral	15/10/87	22/10/91	GHS: Reshun
81	Syed Sardar Hussain	Meherban Hussain	16	MA	P/Sc	CT/B.Ed	2nd Div	02/05/62	Chitral	20/08/89	22/10/91	GHS: Brep
82	Wazir Shah	Sher Bahar Shah	16	MA	Percian	CT/B.Ed	2nd Div	11/01/60	Chitral	12/09/89	22/10/91	GHS: G/Chashma
83	Suher Wardi Khan	Gul Waf Khan	16	MA	History	CT/B.Ed	2nd Div	25/05/60	Chitral	25/09/89	22/10/91	GHS: Harchin
84	Nasir ud Din	Sher Zada Khan	16	MA	Islamiyat	CT	2nd Div	01/01/55	Chitral	18/04/90	22/10/91	GHS: Shaligram
85	Noor ul Saba	Faiz ulah Jan	16	MA	Urdu	CT/M.Ed	2nd Div	20/06/70	Chitral	23/04/92	23/04/92	GHS: Kosht
86	Kfurshid Ali	Mohd Ali Noor	16	MA	Percian	CT	2nd Div	10/03/64	Chitral	30/04/92	30/04/92	GHS: Drosch
87	Wazir Hussain Shah	Aziz Sikanadar Shah	16	MA	Islamiyat	CT/B.Ed	2nd Div	20/09/69	Chitral	30/04/92	30/04/92	GHS: Warjün
88	Noor Illahi	Saeed Wali Khan	16	BA	2nd Div:	CT/B.Ed	2nd Div	02/02/70	Chitral	30/04/92	30/04/92	GCMHS: (B) Ch:
89	Saghir Ahmad	Maqasad Mured Khan	16	MA	Islamiyat	CT/B.Ed	2nd Div	11/10/64	Chitral	12/08/85	01/05/92	GHS: Baranis
90	Miraj ud Din	Ghairat Beg	16	BA	2nd Div:	CT	2nd Div	12/02/67	Chitral	01/05/92	01/05/92	GHS: Warjün
91	Nizam ud Din	Asif Khan	16	MA	Islamiyat	CT/B.Ed	2nd Div	02/05/67	Chitral	01/05/92	01/05/92	GHS: Charun
92	Khalil ur Rehman	Shah Alam	16	MA	Islamiyat	CT/B.Ed	2nd Div	02/01/71	Chitral	01/05/92	01/05/92	GHS: Barumowir
93	Farooq Mehmood	M. Qasim	16	BA	3rd Div:	CT/B.Ed	2nd Div	25/04/71	Chitral	01/05/92	01/05/92	GHS: Brep
94	Syed Miran Shah	Zakoor Shah	16	MA	Islamiyat	CT/B.Ed	2nd Div	01/06/71	Chitral	01/05/92	01/05/92	GHS: Rach
95	Gul Ahmed Khan	Gul Akbar Khan	16	MA	Islamiyat	CT/M.Ed	2nd Div	03/06/62	Chitral	28/02/88	02/05/92	GHS: Dornil
96	Amir Wali Khan	Mehram Khan	16	MA	Islamiyat	CT/M.Ed	2nd Div	05/03/68	Chitral	03/05/92	03/05/92	GHS: Shoghju
97	Mehboob Rasool	Murid Rasool	16	MA	Islamiyat	CT/M.Ed	2nd Div	10/03/65	Chitral	05/05/92	05/05/92	GHS: Ureoson
98	Murt ur Rehman	Fazal Amin	16	BA	2nd Div:	CT/B.Ed	2nd Div	11/12/67	Chitral	06/05/92	06/05/92	GHS: Kosht
99	Shams ud Din	Mohal ud Din	16	BA	2nd Div:	CT	2nd Div	13/01/68	Chitral	06/05/92	06/05/92	GHS: Balach
100	Khalil Ullah	Sher Haider	16	MA	Eng	CT/M.Ed	2nd Div	03/03/68	Chitral	06/05/92	06/05/92	GHS: Tar
101	Sartaj Ahmad	Habib ulah	16	MA	Urdu	CT/B.Ed	2nd Div	01/02/65	Chitral	07/05/92	07/05/92	GHS: Susoom
102	Mujeeb ur Rehman	Amrullah	15	FA	2nd Div:	CT	2nd Div	01/03/71	Chitral	09/05/92	09/05/92	GMS: Jughoor
103	Israr ud Din	Wazir Khan	16	BA	2nd Divn	CT	2nd Div	01/02/66	Chitral	10/05/92	10/05/92	GHS: Shoghre
104	Khairullah	Baber Baig	16	MA	Islamiyat	CT/M.Ed	2nd Div	01/05/67	Chitral	11/05/92	11/05/92	GHS: Gohkir
105	Atta ulah Khan	Abdul Qayum	16	BA	2n Div:	CT/B.Ed	2nd Div	12/12/63	Chitral	12/10/91	12/05/92	GHS: Chumukone
106	Ghulam Dastagir	Kai Kawos Khan	16	BA	2nd Div:	CT/B.Ed	1st Div:	10/04/64	Chitral	12/05/92	12/05/92	GHS: Sonoghur
107	Jam Mohammad	Gul Muhtd	16	MA	Islamiyat	CT/B.Ed	2nd Div	01/07/70	Chitral	12/05/92	12/05/92	GHS: Rach
108	Nowrooz Khan	Purdom Khan	16	MA	Islamiyat	CT/B.Ed	2nd Div	01/01/67	Chitral	14/05/92	14/05/92	GHS: Mrol
109	Fida Mohd	Mohd Said Khan	16	MA	Islamiyat	CT/B.Ed	2nd Div	17/01/64	Chitral	15/05/92	15/05/92	GHS: Sweer
110	Sultan Mohd	M: Mehrrab Khan	16	MA	Islamiyat	CT/B.Ed	2nd Div	15/04/66	Chitral	15/10/89	19/05/92	GHS: Drosch

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111	Mohd Sabir Shah	Rehmat Ali Shah	16	MA	Urdu	CT/M,Ed	2nd Div	06/04/71	Chitral	21/05/92	21/05/92	GHS: Kushum
112	Shokor Mohd	Bula Khan	16	MA	Islamiyat	CT/B,Ed	2nd Div	01/02/70	Chitral	10/06/92	10/06/92	GHS: Booni
113	Sarder Mohd	Akhtar Muhtd	16	MA	Islamiyat	CT/B,Ed	2nd Div	10/01/64	Chitral	01/06/87	08/09/92	GHS: Hone
114	Israr Ahmad	Gulab Khan	16	MA	P/Sc	CT/M,Ed	3rd Div	04/03/68	Chitral	08/09/92	08/09/92	GHS: Ujino
115	Baha ud Din	Karim Khan	16	BA	2nd Div	CT/B,Ed	2nd Div	07/02/68	Chitral	15/09/92	15/09/92	GHS: G/Chashma
116	Fazl ur Rehman	Wali	16	MA	Urdu	CT/B,Ed	2nd Div	02/02/69	Chitral	15/09/92	15/09/92	GHS: Harchin
117	Ghulam Ahmad	Abdullah Khan	16	MA	Islamiyat	CT/B,Ed	2nd Div	12/03/66	Chitral	16/09/92	16/09/92	GHS: Koste
118	Mukaram ud Din	Nuhrani Khan	16	MA	Islamiyat	CT/B,Ed	2nd Div	11/02/63	Chitral	27/11/88	01/10/92	GHS: Muzhgole
119	Zar Ahmad Shah	Kiram Shah	16	BA	2nd Div	CT/B,Ed	2nd Div	15/05/63	Chitral	10/12/89	27/10/92	GHS: Warjgun
120	Mitraj ud Din	Nizam ud Din	16	MA	Islamiyat	CT/B,Ed	2nd Div	05/03/71	Chitral	10/12/89	27/10/92	GHS: Drosh
121	Saif Illahi	Sultan Jawan	16	MA	Urdu	CT/B,Ed	2nd Div	03/05/67	Chitral	12/12/89	27/10/92	GHS: G/Chashma
122	Rahmat Jaan	Rehmat Wali	16	BA	2nd Div	CT/B,Ed	2nd Div	07/05/64	Chitral	10/03/90	27/10/92	GMS: Seenlasht
123	Khaili Wali Khan	Zar Goli Khan	16	BA	2nd Div	CT/B,Ed	2nd Div	02/01/66	Chitral	22/04/90	27/10/92	GHS: Romboor
124	Nasir ullah Shah	Syed Arab Shah	16	MA	Islamiyat	CT/B,Ed	2nd Div	11/01/59	Chitral	17/03/84	21/11/92	GHS: Khuzh
125	Azizud Din	Hazretud Din	16	BA	2nd Div	CT	2nd Div	19/12/59	Chitral	26/12/87	21/11/92	GMS: Jinjirait
126	Noor Mohamad	Nazil Khan	15	BA	2nd Div	CT/B,Ed	2nd Div	20/01/65	Chitral	01/03/88	21/11/92	GHS: Kushum
127	Islam ud Din Khan	Mir Ajab	15	MA	Islamiyat	CT/B,Ed	2nd Div	06/05/61	Chitral	14/10/87	22/11/92	GHS: Booni
128	Ghulam Shakirin	Arab Khan	15	BA	2nd Div	CT	2nd Div	18/05/58	Chitral	18/10/87	22/11/92	GCMHS: (B) Ch.
129	Mohd Inayat ullah	Mohd Darboor Khan	15	BA	2nd Div	CT/B,Ed	2nd Div	04/07/55	Chitral	26/12/87	22/11/92	GMS: Parwak
130	Zar Barat Khan	Mohd Azim Khan	15	MA	Islamiyat	CT/M,Ed	2nd Div	20/04/65	Chitral	28/09/89	22/11/92	GMS: Iasht Yarkhun
131	General Nadir	Gul Nadir Khan	15	MA	Islamiyat	CT/B,Ed	2nd Div	15/08/59	Chitral	15/04/90	22/11/92	GHS: Charun
132	Mohd Hamid ullah	Fazl ur Rehman	15	MA	Arabic	CT/B,Ed	2nd Div	23/11/62	Chitral	11/04/93	11/04/93	GMS: Beori
133	Mir Wazir Khan	Sulaiman Shah	15	BA	2nd Div	CT	2nd Div	01/09/64	Chitral	11/04/93	11/04/93	GMS: Naggar
134	Riaz Ahmad	Ghulam Mohd	15	BA	2nd Div	CT/B,Ed	2nd Div	02/01/69	Chitral	11/04/93	11/04/93	GHS: Mirai
135	Mitraj ud Din	Hustiyar Shah	15	BA	2nd Div	CT/B,Ed	2nd Div	05/02/70	Chitral	11/04/93	11/04/93	GMS: Persan
136	Hamid ur Rehman	M: Shaheed Khan	15	MA	Urdu	CT/B,Ed	2nd Div	15/01/70	Chitral	12/04/93	12/04/93	GCMHS: Chitral
137	Amir Mohd	Quwat Younus Khan	15	BA	2nd Div	CT	2nd Div	09/05/70	Chitral	15/04/93	15/04/93	GMS: Warimoon
138	Khowaja Khizar Khan	Khosh Mohd Khan	15	MA	Islamiyat	CT/M,Ed	2nd Div	10/02/71	Chitral	15/04/93	15/04/93	GHS: S/Owir
139	Shah Nawaz Khan	Mohd Nafas Khan	15	BA	2nd Div	CT	2nd Div	15/03/66	Chitral	30/09/89	29/04/93	GMS: Ione
140	Qayum	Takbir Khan	15	BA	2nd Div	CT	2nd Div	02/03/65	Chitral	28/09/89	29/04/93	GMS: Brestgram
141	Syed Hazar Shah	Ruzgar Shah	15	BA	2nd Div	CT/B,Ed	2nd Div	03/04/62	Chitral	25/09/89	29/04/93	GHS: Chulni
142	Mehsoob Ali	Abdul Wahheed	15	BA	2nd Div	CT	2nd Div	14/04/68	Chitral	09/10/89	29/04/93	GMS: Jughur
143	Ghulam Wali Shah	Sher Faraz	15	MA	Islamiyat	CT/M,Ed	2nd Div	15/08/65	Chitral	26/03/90	29/04/93	GMS: Knot (P)
144	Hamid ullah	Muhtd Shah	15	MA	Islamiyat	CT/M,Ed	2nd Div	15/01/64	Chitral	26/05/92	29/04/93	GHS: Melp
145	Siraj Ahmad	Alim Jan	15	BA	1st Div	CT	1st Div	10/04/67	Chitral	01/05/93	01/05/93	GMS: (B) Chitral
146	Mohd Shuja ud Din	Zaimud Din	15	FA	2nd Div	CT	2nd Div	01/04/70	Chitral	01/05/93	01/05/93	GHS: Istrau
147	Mirza Nadir Shah	Shah Mirza	15	MA	Islamiyat	CT/M,Ed	2nd Div	02/03/68	Chitral	03/05/93	03/05/93	GHS: Rech
148	Israr ud Din	Sarder Wali Khan	15	BA	2nd Div	CT/B,Ed	2nd Div	20/02/70	Chitral	03/05/93	03/05/93	GMS: Sakt
149	Zia ud Din	Faqir Azam	15	BA	2nd Div	CT	2nd Div	01/01/64	Chitral	12/05/93	12/05/93	GHS: Ursoon

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150	Habib ur Rehman	Abdul Aziz	15	BA	2nd Div:	CT	1st Div:	15/03/65	Chitral	01/06/92	24/06/93	GMS: Terich (P)
151	Aziz Nawaz Khan	Sultan	15	BA	2nd Div:	CT/B.Ed	2nd Div	24/04/64	Chitral	28/05/93	28/05/93	GHS: Werkup
152	Jahan Ali Shah	Murid Shah	15	BA	2nd Div:	CT/B.Ed	2nd Div	25/03/70	Chitral	10/07/93	10/07/93	GMS: Sakt
153	Mir Wazir Shah	Sultan Shah	15	BA	2nd Div:	CT/B.Ed	2nd Div	15/04/65	Chitral	05/08/93	05/08/93	GHS: Herchin
154	Nasir ullah	Mohd Wazir Khan	15	BA	2nd Div:	CT/B.Ed	2nd Div	14/08/70	Chitral	05/08/93	05/08/93	GMS: Goleen
155	Nadir Wali Khan	Mehrab Wali	15	BA	2nd Div:	CT/B.Ed	2nd Div	07/04/64	Chitral	10/08/93	10/08/93	GMS: M/Ayun
156	Qudrat ullah Jan	Shah Naqi Jan	15	BA	2nd Div:	CT/B.Ed	2nd Div	08/04/69	Chitral	15/08/93	15/08/93	GHS:Domil
157	Hazrat ud Din	Abdul Ghafor Khan	15	MA	Islamiyat	CT	2nd Div	25/12/63	Chitral	16/08/93	16/08/93	GMS: Dizg
158	Karam ilahi	Fazal ilahi	15	MA	Islamiyat	CT/B.Ed	2nd Div	02/04/65	Chitral	16/08/93	16/08/93	GMS: Nishksh
159	Ali Jamat Khan	Rustam Khan	15	BA	2nd Div:	CT/B.Ed	2nd Div	02/02/72	Chitral	17/08/93	17/08/93	GHS:Shehgram
160	Anwar Ahmad	Saif ul Islam	15	MA	Islamiyat	CT	2nd Div	15/03/72	Chitral	20/08/93	20/08/93	GHS:Gohkir
161	Mumtaz Ali Khan	Burhan Ali Khan	15	FA	2nd Div:	CT	2nd Div	01/11/69	Chitral	23/08/93	23/08/93	GHS:Rach
162	Rashid Baig	Bustan Khan	15	MA	Islamiyat	CT/B.Ed	2nd Div	19/03/59	Chitral	01/12/86	25/12/93	GMS: Riri Owir
163	Amir Waji Khan	Ghulam Khan	15	MA	Urdu	CT/B.Ed	2nd Div	07/09/60	Chitral	01/12/86	25/12/93	GMS: mough
164	Saif ullah Jan	Abdullah Jan	15	BA	2nd Div:	CT/B.Ed	2nd Div	01/06/65	Chitral	15/10/87	25/12/93	GHS:Chumurkhon
165	Habib ur Rehman	Sahib Khan	15	MA	Islamiyat	CT/B.Ed	2nd Div	15/01/66	Chitral	17/03/88	25/12/93	GMS: Terich (P)
166	Bashir Hussain	Ghulam Hussain	15	BA	2nd Div:	CT	2nd Div	01/02/58	Chitral	21/09/89	25/12/93	GHS: Hone
167	Abdul Jalal	Shokor Alam Taji	15	BA	2nd Div:	CT/B.Ed	2nd Div	02/03/61	Chitral	24/09/89	25/12/93	GMS: Miragram 1
168	Fazal ilahi	Fazal Karim	15	MA	Islamiyat	CT/B.Ed	2nd Div	01/01/66	Chitral	18/04/90	25/12/93	GHS: kosht
169	Ghulam Mohd	Islam	15	MSC	P/Stid	CT/B.Ed	2nd Div	03/03/64	Chitral	23/09/89	05/03/94	GHS: G/Chashma
170	Javed Ahmed	Nadir Aman Khan	15	BA	2nd Div:	CT	2nd Div	15/02/63	Chitral	10/12/89	05/03/94	GHS: Gohkir
171	S : Gamar ud Din Sh	Mukaram Shah	15	MA	Urdu	CT/M.Ed	2nd Div	04/04/66	Chitral	17/10/89	06/07/94	GHS: Harchin
172	Syed Mubarak Ali Sh	Syed Aziz Shah	15	MA	Islamiyat	CT,B.Ed	2nd Div	07/03/70	Chitral	24/11/94	24/11/94	GHS: Booni
173	Dawood Jan	Bahadar Khan	15	BA	2nd Div:	CT	2nd Div	04/02/63	Chitral	24/01/90	09/01/95	GCMHS: (B) Ch:
174	Fazl Ullah	M. Nadir Khan	15	BA	2nd Div:	CT/B.Ed	2nd Div	01/01/67	Chitral	15/02/90	09/01/95	GHS:Kuju
175	Khalid Ahmad	Ghazi Khan	15	MA	Islamiyat	CT/B.Ed	2nd Div	02/01/67	Chitral	15/04/90	09/01/95	GMS: Preit
176	Rahmat Aziz Khan	Syed Aman Khan	15	MSC	Geo	B.Ed	2nd Div	14/08/64	Chitral	09/06/92	09/01/95	GMS: Riri Owir
177	Yasir Shahzad	Wari Khan	15	BA	2nd Div:	CT	2nd Div	13/01/68	Chitral	15/03/95	16/03/95	GHS:Broze
178	Laal Khan	Sher Khan	15	BA	2nd Div:	CT	2nd Div	10/03/70	Chitral	21/03/95	21/03/95	GMS: Warimoon
179	Asad ur Rehman	Abdul Khaliq	15	MA	Islamiyat	CT/M.Ed	2nd Div	15/01/63	Chitral	21/09/86	01/07/97	GMS: Awi
180	Atta ullah Shah	Mubarak Ali Shah	15	MA	Arabic	CT/M.Ed	2nd Div	01/04/69	Chitral	15/09/88	01/07/97	GMS: Kosh (Bala)
181	Ghazi ur Rehman	Saeed ur Rehman	15	BA	2nd Div:	CT/B.Ed	1st Div:	05/05/71	Chitral	15/10/89	01/07/97	GMS: Nagar
182	Mohd Afzal Khan	Dashman Khan	15	BA	2nd Div:	CT/M.Ed	2nd Div	17/02/67	Chitral	01/07/97	01/07/97	GHS: Sonoghore
183	Noor Shahid Din	Nowsherwan	15	MA	Islamiyat	CT/B.Ed	1st Div:	06/05/67	Chitral	22/09/86	01/03/92	GHS: Muzghole
184	Hisamud Din	Mukaram Khan	15	MA	Islamiyat	CT/B.Ed	2nd Div	10/03/63	Chitral	28/05/88	01/03/92	GHS: Parabeg
185	Mohd Sami ullah	Amin Shah	15	MA	Islamiyat	CT	2nd Div	04/09/72	Chitral	01/04/92	01/03/98	GHS: Baranis
186	Bahader Khan	Akber Khan	15	MA	Islamiyat	CT/M.Ed	2nd Div	14/12/62	Chitral	24/11/88	08/04/99	GHS: Kessu
187	Mohd Zahir Shah	Shah Rasool	15	BA	2nd Div:	CT/B.Ed	2nd Div	12/03/66	Chitral	21/05/86	09/04/95	GMS: Warlun
188	Amir Saifder	Sheli Saifder	15	MA	Islamiyat	CT/B.Ed	2nd Div	01/03/67	Chitral	22/09/87	09/04/99	GHS: Reshun

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189	189	Mohd Ghazi Khan	Janan Ghazi	15	BA	2nd Div:	CT/B.Ed	2nd Div	22/03/60	Chitral	02/06/81	10/04/99	GHS: Ujnoo
190	190	Taqat Wali Shah	Abdul Majid Shah	15	BA	1st Div:	CT/B.Ed	2nd Div	15/10/66	Chitral	14/04/99	14/04/99	GMS: Parkusap
191	191	Amir Ali Khan	Mohd Khan	15	MSC	P/Std	CT/B.Ed	2nd Div	15/03/70	Chitral	24/06/99	24/06/99	GMS: Behmi
192	192	Sultan Hussain	Meharab Shah	15	MA	Islamiyat	CT/B.Ed/Tech	2nd Div	30/06/65	Chitral	27/11/94	07/10/99	GHS: Ayun
193	193	Karim ullah	Rahim ullah	15	BA	2nd Div:	CT/B.Ed	2nd Div	20/05/54	Chitral	03/12/72	08/10/99	GHS: Barenis
194	194	Musa Karim	Rakin shah	15	BA	2nd Div:	CT	2nd Div	15/12/54	Chitral	16/10/73	08/10/99	GHS: Hone
195	195	Mir Karim Khan	Ismail Khan	15	BA	2nd Div:	CT/B.Ed	2nd Div	22/02/56	Chitral	01/03/81	08/10/99	GHS: Zondrangram
196	196	Muhd Zaman	Mula Qimat Shah	15	BA	2nd Div:	CT/B.Ed	2nd Div	22/11/62	Chitral	01/04/83	08/10/99	GHS: Arandu
197	197	Lutfi Karim	Mir Fati Shah	15	BA	2nd Div:	CT/B.Ed	2nd Div	10/01/63	Chitral	15/01/84	08/10/99	GHS: Baranis
198	198	Abdul Wali Khan	Mahboob Wali Khan	15	MA	Islamiyat	CT/M.Ed	2nd Div	01/01/73	Chitral	01/04/92	08/10/99	GHS: Muzghole
199	199	Mubarak Khan	Baba Khan	15	MA	Urdu	CT/B.Ed	2nd Div	02/01/68	Chitral	08/10/99	08/10/99	GHS: Sosoom
200	200	Wajeehud Din	Shamsud Din	15	BA	2nd Div:	CT/B.Ed/Tech	2nd Div	22/03/71	Chitral	08/10/99	08/10/99	GHS: Balach
201	201	Sultan Murad	Shamsher	15	BA	2nd Div:	CT/B.Ed	2nd Div	10/03/54	Chitral	04/10/74	09/10/99	GHS: Shahgram
202	202	Mohd Umar	Muhd Younus	15	BA	2nd Div:	CT	2nd Div	06/02/63	Chitral	01/12/83	09/10/99	GHS: Barum Owir
203	203	Sher Mohd Din	Iqrar ud Din	15	MA	Islamiyat	CT	2nd Div	01/01/64	Chitral	08/02/84	09/10/99	GHS: Reshun
204	204	Abdul Khaliq	Khosh Lihaf	15	MA	Islamiyat	CT Tec/B.Ed	2nd Div	15/02/63	Chitral	09/10/99	09/10/99	GHS: Booni
205	205	Mohammad Shah	Namakin Shah	15	BA	3rd Div:	CT	2nd Div	12/01/56	Chitral	22/11/86	31/03/02	GHS: Reshun
206	206	Mohd Saeed	Faqir Muhd	15	MA	Islamiyat	CT/B.Ed	2nd Div	14/10/65	Chitral	21/09/86	04/09/02	GMS: Drosh
207	207	Ubaid ur Rehman	Totia Khan	15	MA	Islamiyat	CT	2nd Div	06/02/68	Chitral	21/09/86	04/09/02	GMS: N/Owir
208	208	Sultan Hussain Shah	Sultan Wali Shah	15	MA	Islamiyat	CT/B.Ed	2nd Div	01/02/66	Chitral	18/09/88	04/09/02	GMS: Shishi
209	209	Sami ur Rehman	Abdul Haji	15	MA	Islamiyat	CT/B.Ed	2nd Div	15/01/64	Chitral	26/11/88	04/09/02	GMS: Lone
210	210	Nasir Ahmed	Buzurg Ahmed	15	MA	Islamiyat	CT/B.Ed	2nd Div	06/06/66	Chitral	19/11/89	04/09/02	GMS: Gahirate
211	211	Sultan ur Rehman	Yatim Shah	15	MA	Islamiyat	CT/B.Ed	2nd Div	12/03/69	Chitral	15/03/90	04/09/02	GHS: Kessu
212	212	Mastan Gul	Shamsher Khan	15	MA	Islamiyat	CT/B.Ed	2nd Div	26/12/68	Chitral	01/04/92	04/09/02	GHS: Tar
213	213	Asad ullah	Khosh Nawaz	15	MA	Islamiyat	CT/B.Ed	2nd Div	04/03/70	Chitral	01/04/92	04/09/02	GHS: Ayun
214	214	Ikhtisham ul Haq	Nizam ud Din	15	MA	Islamiyat	CT/B.Ed	2nd Div	23/03/71	Chitral	02/05/92	04/09/02	GMS: Gahirate
215	215	Shafiq ur Rehman	Sahib Dul	15	MA	Islamiyat	CT/B.Ed	1st Div:	02/01/70	Chitral	06/12/94	04/09/02	GHS: Kosht
216	216	Abdur Razaq	Mehrab Jee	15	MA	Islamiyat	CT/B.Ed	2nd Div	01/05/57	Chitral	24/11/88	05/09/02	GHS: Broze
217	217	M. Tariq Shah	M. Zahir Shah	15	MA	Islamiyat	CT Agr /B.Ed	2nd Div	11/04/67	Chitral	15/03/90	05/09/02	GHS: Kujju
218	218	Jalal ud Din	Ghulam Mohd	15	MA	Islamiyat	CT/B.Ed	2nd Div	18/04/73	Chitral	11/04/93	09/09/02	GHS: Kushum
219	219	Abdul Sharif Khan	Abdul Qadir Khan	15	MA	Islamiyat	CT	2nd Div	02/03/65	Chitral	04/03/90	10/09/02	GHS: Drosh
220	220	M. Muzaffar ud Din	Farahud Din	15	MA	Islamiyat	CT/B.Ed	2nd Div	10/06/66	Chitral	22/09/84	11/09/02	GMS: Muldeh Ayun
221	221	Bashir Ahmed	Juma Gul	15	BA	2nd Div:	CT	2nd Div	01/01/66	Chitral	21/09/86	11/09/02	GHS: Sweer
222	222	Muen ud Din	Nizam ud Din	15	MA	Islamiyat	CT/B.Ed	2nd Div	06/03/68	Chitral	11/06/87	11/09/02	GHS: Arandu
223	223	Haji Akber	Sher Haider	15	MA	Islamiyat	CT/B.Ed	2nd Div	02/05/68	Chitral	14/10/89	11/09/02	GHS: Drosh
224	224	Faiz Akber Khan	Quat Khan	15	MA	Islamiyat	CT/M.Ed	2nd Div	05/03/65	Chitral	23/03/90	11/09/02	GHS: Mastuj
225	225	Hussain Baksh	Faiz ullah	15	MA	Islamiyat	CT/B.Ed	2nd Div	01/01/69	Chitral	09/01/91	11/09/02	GMS: Rayeen
226	226	Saif ud Din	Ghulam Jaffar	15	MA	Islamiyat	CT/B.Ed	2nd Div	01/10/69	Chitral	01/04/92	11/09/02	GHS: Kosht
227	227	Taj Mohd Khan	Gul Murad Khan	15	MA	Islamiyat	CT/M.Ed	2nd Div	01/05/72	Chitral	29/05/93	11/09/02	GHS: Shahgram

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228	Ishad Ullah	Nasir Ullah	15	MA	Islamiyat	CT/M.Ed	2nd Div	01/03/70	Chitral	02/05/98	11/09/02	GHS:Bitra Nisar
229	Huzur ud Din	Abdur Rahim Shah	15	MA	Islamiyat	CT/B.Ed	2nd Div	14/03/65	Chitral	27/09/86	12/09/02	GHS: Ashrate
230	Abdul Khaliq	Sher Maidan	15	MA	Islamiyat	CT/B.Ed	2nd Div	15/12/66	Chitral	15/03/90	13/09/02	GHS: Wairun
231	Muhammad Ishaq	Dana Khan	15	BA	2nd Div:	CT/B.Ed	1st Div:	01/01/63	Chitral	16/09/85	14/09/02	GHS:Muazghole
232	Mohd Hussain	Ashrafi Khan	15	BA	2nd Div:	CT	2nd Div:	10/04/72	Chitral	11/04/93	15/09/02	GMS: Preit
233	Nizam ud Din	Usaidullah	15	BA	2nd Div:	CT	2nd Div:	15/02/60	Chitral	11/11/79	16/09/02	GHS:Melp
234	Shah Mardan Shah	Alli Mudd Shah	15	MA	Islamiyat	CT/B.Ed	2nd Div	04/08/64	Chitral	03/12/88	17/09/02	GHS: Chumukone
235	Zulfikar Ali Khan	Alli Hurmat Khan	15	BA	2nd Div:	CT/B.Ed	2nd Div	12/03/56	Chitral	10/11/79	21/03/04	GMS: Dizg
236	Fida Ahmed Khan	Jano Mir	15	MA	Islamiyat	CT/B.Ed	2nd Div	16/05/69	Chitral	20/09/88	21/03/04	GHS: Khot
237	Shams ud Din	Chainak Malik	15	MA	P/Sc	CT/B.Ed	2nd Div	04/10/68	Chitral	13/11/94	21/03/04	GHS: Dornil
238	Sardar Muhtd	Ziarat Khan	15	MA	Islamiyat	CT/B.Ed	1st Div:	02/12/70	Chitral	08/07/97	21/03/04	GHS:Ayun
239	Mujeeb ur Rehman	Saif ur Rehman	15	MA	Islamiyat	CT/B.Ed	2nd Div	01/05/68	Chitral	21/03/04	21/03/04	GHS: Drosh
240	Amir ur Rehman	Abdul Hamid	15	BA	2nd Div:	CT	2nd Div	01/01/57	Chitral	18/11/79	01/04/04	GHS: Barum Owir
241	Saif ur Rehman	Wazir	15	BA	2nd Div:	CT/B.Ed	2nd Div	12/01/59	Chitral	20/11/79	01/04/04	GMS: Nichaghowir
242	Mohd Karan Shah	Farasat Shah	15	BA	2nd Div:	CT/B.Ed	1st Div:	01/01/57	Chitral	05/03/80	01/04/04	GHS:Charun
243	Rahmat Nawaz Khan	Baram Baig	15	BA	2nd Div:	CT/B.Ed	2nd Div	12/01/58	Chitral	21/05/80	01/04/04	GHS: Zondrangram
244	Sulaiman Shah	Dowlatman Shah	15	BA	2nd Div:	CT/B.Ed	2nd Div	01/07/58	Chitral	26/04/81	01/04/04	GHS:Werkup
245	Rafiq Ullah	Nasir Ullah	15	BA	2nd Div:	CT/B.Ed	2nd Div	18/05/55	Chitral	14/11/81	01/04/04	GMS: L/Kosht
246	Abdul Wali Shah	Rahmat Fati Shah	15	BA	2nd Div:	CT	2nd Div	01/12/60	Chitral	21/02/82	01/04/04	GHS:Barenis
247	Rehmat Khan	Abdul Hamid Khan	15	MA	Islamiyat	CT	2nd Div	01/11/64	Chitral	19/07/82	01/04/04	GHS:G/Chashma
248	Bashir Ahmed Khan	Wazir Azam Khan	15	BA	2nd Div:	CT/B.Ed	2nd Div	18/03/64	Chitral	01/08/82	01/04/04	GMS: Milgra No. 1
249	Sher Aziz Khan	Sher Bahader Khan	15	MA	Islamiyat	CT/B.Ed	2nd Div	12/02/57	Chitral	24/10/82	01/04/04	GMS: Parwak
250	Hidayat ur Rehman	Miran Bahader	15	BA	2nd Div:	CT	2nd Div	03/03/64	Chitral	12/12/82	01/04/04	GHS: S/Owir
251	Sher Azim Khan	Bulbul Hakim Khan	15	BA	2nd Div:	CT	2nd Div	24/03/60	Chitral	16/01/83	01/04/04	GMS: Awi
252	Fida Mohd Khan	Ziarat Khan	15	BA	2nd Div:	CT	2nd Div	05/04/64	Chitral	13/04/83	01/04/04	GMS: Kalkatak
253	Aziz Mohammad	Khosh Mohd	15	BA	2nd Div:	CT	2nd Div	02/01/62	Chitral	05/05/83	01/04/04	GMS: Behmi
254	Mansoor Hussain	Sher Gori Khan	15	BA	2nd Div:	CT	2nd Div	01/02/61	Chitral	10/05/83	01/04/04	GHS:Balach
255	Aziz ur Rehman	Hassan Noor	15	BA	2nd Div:	CT	2nd Div	03/03/61	Chitral	15/01/84	01/04/04	GHS:Balach
256	Fazal Mabood	Khair ul Uloom	15	BA	2nd Div:	CT	2nd Div	01/01/58	Chitral	08/02/84	01/04/04	GHS: Ashrat
257	Nawrooz Khan	Aziz	15	BA	2nd Div:	CT/B.Ed	2nd Div	06/01/63	Chitral	25/08/84	01/04/04	GHS: Mastuj
258	Mohd Qadir Shah	Mohd Nasir Shah	15	BA	2nd Div:	CT/B.Ed	2nd Div	07/01/56	Chitral	18/09/84	01/04/04	GHS: Chunj
259	Mohammad Israil	Abdul Hakim	15	BA	2nd Div:	CT	2nd Div	05/02/63	Chitral	05/10/84	01/04/04	GHS: Barinis
260	Abdur Rehman	Shirin Khan	15	MA	Urdu	CT/B.Ed	2nd Div	14/06/63	Chitral	01/01/85	01/04/04	GMS: Jughoor
261	Ghulam Rasool	Ghulam Mohd	15	BA	2nd Div:	CT	2nd Div	02/11/62	Chitral	15/09/85	01/04/04	GMS: L/Kosht
262	Ibrahim Shah	Wazir Mohd	15	MA	Islamiyat	CT/M.Ed	2nd Div	01/02/70	Chitral	11/04/93	01/04/04	GMS: S/Bomborate
263	Habib ul Ahmed	Haider Ahmed	15	MA	Urdu	CT/M.Ed	2nd Div	15/05/72	Chitral	11/04/93	01/04/04	GHS:Shahgram
264	Amir ud Din	Aziz Ud Din	15	MA	Islamiyat	CT/B.Ed	1st Div:	01/12/72	Chitral	12/04/93	01/04/04	GMS: Birir
265	Sharaf ud Din	Woor Nadir Khan	15	BA	2nd Div:	CT	2nd Div	20/04/58	Chitral	01/12/96	01/04/04	GHS: Zondrangram
266	Saeed ur Rauf	Abdur Rauf	15	MA	Islamiyat	CT/B.Ed	2nd Div	20/12/73	Chitral	26/01/98	01/04/04	GHS: Booni

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267	267	Subhan ud Din	Khuda Nuzeh	15	MA	Islamiyat	CT/M,Ed	2nd Div	04/04/72	Chitral	29/12/99	01/04/04	GHS: G/Chashma
268	268	Hsaan ul Haq	Mohammed Aziz	15	MA	P/Study	CT/M,Ed	2nd Div	20/03/71	Chitral	01/04/04	01/04/04	GHS: Sweet
269	269	Ishsan ullah	M. Fatigoo Khan	15	MSC	Islamiyat	CT/M,Ed	2nd Div	27/12/71	Chitral	02/04/04	02/04/04	GHS: Reshun
270	270	Roshan Hussain	Gulie Khan	15	MA	Urdu	CT/B,Ed	2nd Div	20/12/56	Peshawar	29/03/88	01/06/04	GHS: Ayun
271	271	Hussain Ahmed	Abdullah	15	BA	2nd Div:	CT	2nd Div	01/01/65	Chitral	07/05/83	01/10/04	GHS: Madax
272	272	Rahmat ullah	Mir Waazir Shah	15	BA	2nd Div:	CT	2nd Div	23/09/73	Chitral	22/07/06	22/07/06	GHS: Ujro
273	273	Sardar Ayub	Mohammed Nadir	15	MA	Islamiyat	CT/B,Ed	2nd Div	01/01/56	Chitral	03/11/87	23/07/06	GMS: Prevet
274	274	Hazrat Karim	Fazal Karim	15	MA	Islamiyat	CT	2nd Div	24/03/57	Chitral	23/07/06	23/07/06	GHS: Bumburate
275	275	Mohd Usman ud Din	Abduli Ghafoor Khan	15	BA	2nd Div:	CT/B,Ed	2nd Div	12/02/64	Chitral	25/02/82	01/08/06	GMS: Seen Lasht
276	276	Sami ullah	Abduli Haji	15	MA	Islamiyat	CT/B,Ed	2nd Div	06/05/59	Chitral	01/11/79	01/08/06	GHS: Gohki
277	277	Mohd Sharif ullah	Munshi Khan	15	BA	2nd Div:	CT	2nd Div	10/06/58	Chitral	20/11/79	01/08/06	GMS: Sore Rasch
278	278	Giulam Mohd	Mehrab Wali	15	MA	Islamiyat	CT/B,Ed	2nd Div	01/02/58	Chitral	19/04/81	01/08/06	GHS: Ayun
279	279	Rahmat Aziz Khan	Laghal Khan	15	BA	2nd Div:	CT	2nd Div	16/03/59	Chitral	10/05/81	01/08/06	GHS: Bang
280	280	Muti ullah	Mustarraf Khan	15	BA	3rd Div:	CT	2nd Div	15/02/61	Chitral	12/12/82	01/08/06	GHS: Warjün
281	281	Fazal Ahmad Khan	Mohd Sharif Khan	15	BA	2nd Div:	CT	2nd Div	12/02/63	Chitral	07/02/84	01/08/06	GMS: Golee 1
282	282	Mohd Israr ud Din	Shahab Ud Din	15	BA	2nd Div:	CT	2nd Div	10/03/63	Chitral	19/09/84	01/08/06	GMS: Orghich
283	283	Haji Buliah	Shakh Bap	15	MA	Islamiyat	CT/B,Ed	1st Div:	25/04/66	Chitral	20/09/84	01/08/06	GHS: Werkup
284	284	Ismail Khan	Masar Khan	15	MA	Islamiyat	CT/B,Ed	2nd Div	14/04/64	Chitral	27/09/84	01/08/06	GHS: Werkup
285	285	Muzaffar ud Din	M. Umer Khan	15	MA	Islamiyat	CT	2nd Div	01/01/50	Chitral	13/08/85	01/08/06	GCMHS: (B) Chit
286	286	Ashraf Karim Khan	Eubul Karim	15	FA	2nd Div:	CT	2nd Div	16/02/62	Chitral	16/09/85	01/08/06	GMS: Zhupo
287	287	Mas Wali Khan	Lulock	15	BA	2nd Div:	CT/B,Ed	2nd Div	01/04/55	Chitral	21/09/85	01/08/06	GHS: Mad Lasht
288	288	Dawood Ahmed	Fazal Maahood	15	BA	2nd Div:	CT	2nd Div	22/08/59	Chitral	24/05/87	01/08/06	GMS: Shishi
289	289	Mehrab Shah	Qababat Shah	15	MA	Islamiyat	CT/B,Ed	2nd Div	06/01/57	Chitral	21/09/87	01/08/06	GHS: Koghul
290	290	Abdul Qadim	Abdulrah Khan	15	MA	Islamiyat	CT	2nd Div	01/04/57	Chitral	04/11/87	01/08/06	GHS: Golafr
291	291	Asad ur Rehman	Habib ur Rehman	15	BA	2nd Div:	CT	2nd Div	24/01/70	Chitral	02/05/92	01/08/06	GMS: parvak
292	292	Ahmed Salim	Haji Muzid	15	MA	Islamiyat	CT/M,Ed	2nd Div	15/03/70	Chitral	09/12/92	01/08/06	GHS: Bomborate
293	293	Haider Ali Khan	Sher Khan	15	MA	Urdu	CT/M,Ed	2nd Div	12/12/72	Chitral	07/03/93	01/08/06	GMS: parvak
294	294	Sahib ullah Khan	Vair Ahmad Jan	15	MA	Islamiyat	CT	2nd Div	19/05/72	Chitral	04/06/96	01/08/06	GHS: Khot
295	295	Hasan Kamal ud Din	Spokora Tat	15	MA	P/Sc	CT/M,Ed	2nd Div	01/03/77	Chitral	17/01/98	01/08/06	GMS: Orghuch
296	296	Mohd Hamid ul Haq	Adul Haq	15	BA	2nd Div:	CT	2nd Div	15/03/79	Chitral	01/03/00	01/08/06	GHS: Drosch
297	297	Sher Hawas	Sharetal Khan	15	BA	2nd Div:	CT	2nd Div	01/03/55	Chitral	01/08/06	01/08/06	GHS: Brep
298	298	Ahmad Nawaz Khan	Lmir Nawaz	15	FA	2nd Div:	CT	2nd Div	01/02/59	Chitral	03/08/06	03/08/06	GMS: Jinjite Koh
299	299	Mohammed Ghayes	Mohd Ilyas Khan	15	MA	Islamiyat	CT	2nd Div	11/01/66	Chitral	21/09/86	13/08/06	GHS: Kosht
300	300	Habib ur Rehman	Giulam Awila	15	MA	Urdu	CT/B,Ed	2nd Div	15/11/52	Chitral	21/09/87	12/10/06	GMS: krinj
301	301	Fazal Islam	Mubarak Shah	15	MA	Islamiyat	CT/M,Ed	2nd Div	10/03/64	Chitral	20/09/87	12/10/06	GHS: Baranis
302	302	Siraj ud Din	Jen Dullah Khan	15	BA	2nd Div:	CT/B,Ed	2nd Div	15/03/65	Chitral	13/08/85	13/10/06	GHS: Bumburate
303	303	Mohd Sebir Khan	Giulam Hussain	15	BA	2nd Div:	CT	2nd Div	02/02/65	Chitral	01/11/87	13/10/06	GHS: Broze
304	304	Aziz ur Rehman	Adul Haq	15	MA	Islamiyat	CT/B,Ed	1st Div:	28/01/59	Chitral	01/04/92	15/10/05	GHS: Muzghale
305	305	Sharif ullah	Abdul G. foor Shah	15	BA	2nd Div:	CT	2nd Div	01/04/57	Chitral	01/11/87	01/11/06	GMS: Shishi

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306	Wajid Zaman Khan	M. Rahim Khan	15	MA	Islamiyat	CT/M,Ed	2nd Div	09/05/79	Chitral	18/08/04	01/11/06	GHS: Koghuzi
307	Navaz Khan	Jamiat Khan	15	BA	2nd Div:	CT	2nd Div	02/02/80	Chitral	22/10/84	01/03/08	GMS: Dirosh
308	Mohd Ghafoor Shah	Wazir Azam Khan	15	BA	2nd Div:	CT/B,Ed	2nd Div	12/08/85	Chitral	18/09/85	01/03/08	GHS: Warjuri
309	Sher Jahan Shah	Yorras Khan	15	BA	2nd Div:	CT	2nd Div	06/03/85	Chitral	23/05/87	01/03/08	GHS: Parabeg
310	Mohammed Siyar	Mohammed Musa	15	MSc	Chem	CT/B,Ed	2nd Div	01/02/80	Chitral	01/03/08	01/03/08	GHS: Sweer
311	Mohd Rafi ud Din	Abdul Qayum	15	BA	2nd Div:	CT	2nd Div	20/03/83	Chitral	20/09/86	01/04/08	GHS: Arandu
312	Nisar Ahmad	Fazal Abad	15	MA	Islamiyat	CT/B,Ed	2nd Div	15/03/75	Chitral	23/04/89	03/04/08	GHS: Hone
313	Ubaid ullah	Aziz ullah	15	BA	2nd Div:	CT	2nd Div	15/02/87	Chitral	21/11/87	15/04/08	GMS: Kh/Der
314	Israrud Din	Wazir Khan	15	BA	2nd Div:	CT	2nd Div	01/02/86	Chitral	10/05/92	02/09/08	GHS: Shoghore
315	Syed Israr Ali Shah	S. Dinar Ali Shah	15	BA	2nd Div:	CT Agr	2nd Div	01/02/70	Chitral	02/03/09	02/03/09	GHS: Harchin
316	Mohd Habib ullah	Mohd Saeed ullah	15	BA	2nd Div:	CT	2nd Div	01/11/83	Chitral	01/01/83	03/03/09	GHS: Birga Nisar
317	Rehmat Nawaz	Sahib Khan	15	BA	2nd Div:	CT	2nd Div	03/09/86	Chitral	18/09/85	03/03/09	GMS: Beori
318	Amir Ali Khan	Sher Ali Khan	15	BA	2nd Div:	CT	2nd Div	02/10/84	Chitral	10/01/84	01/04/09	GMS: Seen Isht
319	Riaz ur Rahman	Shah Zarin	15	MA	Urdu	CT/M,Ed	2nd Div	20/01/77	Chitral	18/08/04	01/04/09	GHS: Ashirate
320	Mujeeb ur Rehman	Saif ur Rehman	15	MA	Islamiyat	CT/B,Ed	2nd Div	01/05/88	Chitral	01/04/09	01/04/09	GHS: Drosh
321	Munawar Alam	Mohd Khisrow	15	MA	P/Sc	CT/B,Ed	2nd Div	03/01/81	Chitral	28/04/09	28/04/09	GMS: Kalkatak
322	Amir Hamza	Ashur Khan	15	BA	2nd Div:	CT	2nd Div	04/01/58	Chitral	25/11/86	24/11/10	GHS: Madak Lashit
323	Mohammad Khan	Abdul Latif	15	BA	2nd Div:	CT I,Ar/B,Ed	2nd Div	25/01/72	Chitral	29/11/10	29/11/10	GMS: Gashit
324	Abdul Nasir	Hazrat Jee	15	BA	2nd Div:	CT	2nd Div	01/11/81	Chitral	11/12/82	01/12/10	GMS: Romboor
325	Zafar Ayub	Radir Khan	15	BA	2nd Div:	CT	2nd Div	25/04/86	Chitral	03/11/87	01/12/10	GMS: Breshgem
326	Mir Nazir Khan	Zair Yaqut Khan	15	MA	Islamiyat	CT/M,Ed	2nd Div	10/04/79	Chitral	23/04/89	01/12/10	GHS: Harchin
327	Siraj ud Din	Wali Khan	15	MA	Islamiyat	CT Agr/B,Ed	2nd Div	22/12/74	Chitral	01/12/10	01/12/10	GMS: Balim
328	Mohd Jahangir	Shah Jahan Khan	15	MA	P/Std	CT	2nd Div	01/11/87	Chitral	01/12/10	01/12/10	GMS: Kh/Der
329	Shaukat Ali	Bashir Ahmad	15	BA	2nd Div:	CT	2nd Div	15/09/81	Chitral	02/12/10	02/12/10	GHS: Arkari
330	Wazir Ahmad	Saidullah Jan	15	MSc	Computer/Sc	CT	2nd Div	25/04/84	Chitral	01/07/10	23/03/12	GHS: Ashirate
331	Shakrullah	Sher Ali Khan	15	BA	2nd Div:	CT	2nd Div	07/06/58	Chitral	20/08/85	15/02/12	GMS: Sorlaspor
332	Sardar Khan	Syed Ahmad Kh	15	MA	2nd Div:	CT	2nd Div	27/11/83	Chitral	13/09/85	16/08/12	GHS: Arandu
333	Sardar Khan	Mirze Panah	15	BA	2nd Div:	CT	2nd Div	06/10/58	Chitral	20/10/85	15/03/12	GMS: Baleem
334	Shakir Aman	Ajab Aman	15	BA	3rd Div:	CT	2nd Div	12/04/82	Chitral	25/05/87	15/08/12	GMS: Zhupo
335	Raza Mohd	Fida Mohd	15	BA	2nd Div:	CT	2nd Div	20/11/59	Chitral	31/05/87	15/08/12	GHS: Bomporate
336	Mir Musa Khan	Mahmood	15	BA	2nd Div:	CT	2nd Div	02/04/84	Chitral	23/06/87	15/08/12	GHS: Drosh
337	Noor Azim Shah	Gulsambar	15	BA	2nd Div:	CT	2nd Div	15/03/87	Chitral	21/09/87	17/10/12	GHS: Mdk Lasti-
338	M: Ishaq	Haider Wali Khan	15	BA	2nd Div:	CT	2nd Div	10/01/88	Chitral	21/09/87	17/10/12	GMS: Sorlaspor
339	Shah Jahan Khan	M: Ghulam Khan	15	BA	2nd Div:	CT /B,Ed	2nd Div	02/02/83	Chitral	22/09/87	17/10/12	GMS: L/Yarkhcon
340	Fazal Hanan	Ashraf Khan	15	MA	2nd Div:	CT/B,Ed	2nd Div	15/11/83	Chitral	25/09/87	17/07/14	GHS: Arandu
341	Akbar Wali	Gul Adam	15	BA	2nd Div:	CT/B,Ed	2nd Div	01/12/87	Chitral	01/11/87	17/07/14	GMS: Ursoon
342	M: Miran Shah	Barkat Shah	15	BA	2nd Div:	CT/B,Ed	2nd Div	06/03/84	Chitral	01/01/83	17/07/14	GMS: Sosoom
343	Mubarak Shah	M: Jaleem Shah	15	BA	2nd Div:	CT	2nd Div	01/04/59	Chitral	03/01/83	17/07/14	GMS: Zhupo
344	Saeed Ahmad	Fazal Wahid	15	BA	2nd Div:	CT/B,Ed	2nd Div	15/06/59	Chitral	05/01/85	17/07/14	GMS: Zhupo

ATTACHED

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346	Abdul Kamal	Mir Badshah	15	BA	2nd Div.	CT/B,Ed	2nd Div.	24/05/59	Chitral	11/08/85	17/07/14	GHS: Masuju	NTS
347	Nisar Hussain	Shokran Tat	15	MA	2nd Div.	CT/B,ed	2nd Div.	01/01/70	Chitral	01/03/88	19/07/14	GMS: Zhubo	NTS
348	Samin Ur Rahman	Chiragh Hussain	15	BA	2nd Div.		2nd Div.		Chitral		07/06/14	GHS: Morlasht	NTS
349	Atta Ur Rahman	Zar Waii	15						Chitral		07/06/14	GMS: Nagar	NTS
350	Shafeeq Ahmad	Shafi Ur Rahman	15						Chitral		07/06/14	GMS: Romboor	NTS
351	Mulhd Eid Alam	Zahir Shah	15						Chitral		07/06/14	GHS: Charun	NTS
352	Nasir Ahmad	Kh Maqsood Alam Kh	15						Chitral		07/06/14	GMS: Jinjirate Koh	NTS
353	Aftab Ahmad	Sultan Muhammad	15						Chitral		07/06/14	GHS: Sosoom	NTS
354	Ejaz UD Din	Aziz Wali Shah	15						Chitral		07/06/14	GHS: Kari	NTS
355	Muhammad Safa	Nizam Ud Din	15						Chitral		07/06/14	GMS: Gaash	NTS
356	Mir Akbar Shah	Fard Ahmad Khan	15						Chitral		07/06/14	GMS: Dizge	NTS
357	Gul Muhammad	Mulaim Shah	15						Chitral		07/06/14	GHS: Sosoom	NTS
358	Daud Ul Hasan	Khair Muhammad	15						Chitral		07/06/14	GMS: Parsan	NTS
359	Akbar Ali	Bulan Khan	15						Chitral		07/06/14	GMS: Khuzh	NTS
360	Sadiq Ullah	Muhamamd Wali Shah	15						Chitral		07/06/14	GMS: Hart	NTS
361	Muhammad Khalid K	Muhammad Sabir	15						Chitral		07/06/14	GHS: Harchin	NTS
		Muhammad Ishaq	15						Chitral		07/06/14	GMS: Sorhaspoor	NTS

CERTIFICATE
 Certified that this Seniority list is final/ undisputed, non subjudious and all the CT (M) teachers working in District Chitral are included in this final

District Education Officer,
 (Male) Chitral.

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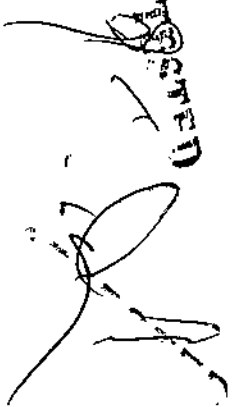
CHECK LIST FOR DEPARTMENTAL PROMOTION COMMITTEE FOR THE PROMOTION OF CT (M) B-15 TO SENIOR CT B-16

S #	Seniority No.	Name	Father's Name	Place of posting	Date of Birth	Dio Data	Last Five Year ACR	Synopsis	Last 3 Years Result	Non Involvement	Bio Data	Last Pay Slip	Service Book	Reg Apptt order against CT post	Remarks
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1	43	Abdul Hakam	Abdul Karim	GHS: Barum Oy	01/01/56									20/09/89	
2	126	Noor Mohammad	Nazil Khan	GHS: Kushum	20/01/65									21/11/92	
3	127	Islam ud Din Khan	Mir Ajab	GHS: Booni	06/05/61									22/11/92	
4	128	Ghulam Shakir	Arab Khan	GCMHS:(g) Cnt.	18/05/58									22/11/92	
5	125	Mohd Inayat ullah	Mohd Daboer Khan	GMS: Parwak	04/07/55									22/11/92	
6	130	Zar Barat Khan	Mohd Azim Khan	GMS:Laahit Yarkhu	20/04/65									22/11/92	
7	131	General Nadir	Gul Nadir Khan	GHS:Charun	15/08/59									22/11/92	
8	132	Mohd Hamid ullah	Faz ur Rehman	GMS: Beori	23/11/62									11/04/93	
9	133	Mir Wazir Khan	Sulaiman Shah	GMS: Nagar	01/09/64									11/04/93	
10	134	Riaz Ahmed	Ghulam Mohd	GHS:Mirai	02/01/69									11/04/93	
11	135	Miraj ud Din	Hushiyar Shah	GMS: Persan	05/02/70									11/04/93	
12	136	Hamid ur Rehman	M: Shahed Khan	GCMHS: Chitral	15/01/70									12/04/93	
13	137	Arif Mohd	Qawat Younus Khan	GMS: Warrnoon	09/05/70									15/04/93	
14	138	Khawaja Khizar Khan	Khosh Mohd Khan	GHS: S/Owir	10/02/71									15/04/93	
15	139	Shah Nawaz Khan	Mohd Nafas Khan	GMS: Ione	15/03/66									29/04/93	
16	140	Qayum	Takbir Khan	GMS: Breshgram	02/03/65									29/04/93	
17	141	Syed Hazer Shah	Ruzgar Shah	GHS: Chuini	03/04/62									29/04/93	
18	142	Mirza Shah Ali	Mirza Shahed	GMS: Besh	11/04/68									29/04/93	
19	143	Ghulam Wali Shah	Sher Faraz	GMS: Khot (P)	15/08/65									29/04/93	
20	144	Hamid ullah	Muhd Shah	GHS:Melip	15/01/64									29/04/93	
21	145	Siraj Ahmad	Alim Jan	GCMHS: (g) Chitral	10/04/67									01/05/93	

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ACCEPTED



Amir Khan - F
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BEFORE THE PESHAWAR HIGH COURT, PESHAWAR

W.P No. 373-P/2015



Ihsan Ullah
S/O Muhammad Failqoos Khan,
Presently residing at Room No.10,
Dir Maidan Palace, Gulberg 1, Peshawar Cant.

.....Petitioner

VERSUS

1. Government of Khyber Pakhtunkhaw through Chief Secretary at Civil Secretariat, Peshawar.
2. Secretary to Government of Khyber Pakhtunkhaw, Elementary and Secondary School Education Department, Civil Secretariat Peshawar.
3. Director Elementary & Secondary Education Government of Khyber Pakhtunkhaw Peshawar.
4. University of Peshawar through Controller of Examinations University of Peshawar.
5. Allama Iqbal Open University, Sector H-8 Islamabad through its Controller of Examination.
6. Deputy Director (Establishment) Directorate of Elementary & Secondary Education Khyber Pakhtunkhaw Peshawar.
7. EDO Elementary & Secondary Education Distt.: Chitral.
8. Secretary Finance Government of Khyber Pakhtunkhaw at Civil Secretariat Peshawar.

.....Respondents

WRITE PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF
PAKISTAN, 1973.

FILED TODAY
Deputy Registrar
03 FEB 2015

ATTESTED
EXAMINER
Peshawar High Court
24 FEB 2018

PRAYER:

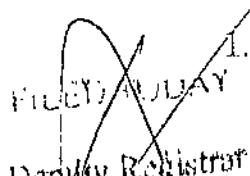
(36) 

ON ACCEPTANCE OF THE INSTANT WRIT PETITION, THE IMPUGNED NOTIFICATION BEARING NO. SO (PE) 4-5/SSRC/MEETING/2003/TEACHING CADRE, PESHAWAR DATED 24-07-2014 ISSUED BY RESPONDENT NO. 2 TO THE EXTENT OF ADDITION OF CONSIDERATION OF BACHELOR (BSC) DEGREE WITH TWO SUBJECTS AS CHEMISTRY, BOTANY AND ZOOLOGY FOR APPOINTMENT OF SST (BPS-16) UNDER 40% QUOTA SPECIFIED FOR SENIOR/CERTIFIED TEACHERS (SCT/CT) BY EXCLUDING THE PETITIONER HAVING BACHELOR DEGREE (B.SC) OF SUBJECT COMBINATION AS ZOOLOGY, BOTANY AND GEOGRAPHY; BE DECLARE AGAINST THE SCHEME OF APPOINTMENTS THROUGH PROMOTION ON THE BASIS OF SENIORITY CUM FITNESS AND ALL SUCH ACTS AND OMISSIONS OF RESPONDENTS WITH EFFECT TO EXCLUDE THE PETITIONER FROM THE PROCESS OF PROMOTION TO SST (BPS-16) UNDER 40% QUOTA FOR THE REASON OF SUCH SUBJECT COMBINATION IN B.SC DEGREE (ALTHOUGH HAVING QUALIFICATION OF B.ED, M.ED AND MA ALONG WITH 11 YEARS RELEVANT EXPERIENCE) MAY ALSO BE DECLARE AS VOID *AB INITIO*, ILLEGAL, UNLAWFUL, WITHOUT LAWFUL AUTHORITY AND JUSTIFICATION; HENCE IN EFFECTIVE UPON THE LEGAL/FUNDAMENTAL/CONSTITUTIONALLY PROTECTED RIGHTS OF THE PETITIONER. ANY SUCH RELIEF WHICH THIS HONOURABLE COURT DEEMS PROPER AND JUST BE GRANTED TO THE PETITIONER AGAINST THE RESPONDENTS KEEPING IN VIEW THE CIRCUMSTANCES OF THE CASE.

Respectfully Sheweth:

Brief facts and grounds giving rise to the instant writ petition are as under;

1. That in the year, 1991 the petitioner passed his Bachelor Degree in Science (B.Sc) with subject combination of Botany, Zoology and Geography as a regular candidate from Government


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Degree College Chitral and was awarded Bachelor of Science Degree from University of Peshawar/ Respondent No.4.

(Copy of Original Degree along with DMC is annexed as Annexure "A")

2. That in the year, 1995 the Petitioner passed professional Course for Certified Teacher (CT-General) from Government Elementary College Chitral. Furthermore the petitioner also possess his professional Degree of Bachelor of Education (B Ed) and Master of Education (M.Ed) granted by Allama Iqbal Open University Islamabad/Respondent No.5 beside Master of Arts (M.A) granted by University of Peshawar/Respondent No.4.
(Copies of Educational Testimonials are annexed as Annexure "B")

3. That the petitioner was appointed as Certified Teacher (CT-BS-09) on 20-03-2004 Vide Notification Endorsement bearing No. 996-901/EB/SECY/APPTT issued by Respondent No.7.
(Copy of Appointment Letter is annexed as Annexure "C")

4. That after consideration and acceptance of his higher and professional qualifications as well as his experience in terms of service benefit; the petitioner has been up graded from time to time at the same cadre and presently working at BPS-15 as Senior Certified Teacher. It is also pertinent to mention here that the petitioner has been granted special allowances in shape of advance increments applicable for higher education in the subject cadre.

5. That although the petitioner has been upgraded in the same cadre of post i.e. CT but never promoted to the next cadre throughout his career of 11 years Service i.e. 20-03-2004 till date due to variation in Government policies from time to time.

6. That recently Secretary to Government of Khyber Pakhtunkhaw/Respondent No.2 has issued the impugned Notification bearing No. So (PE) 4-5/SSRC/Meeting/2003/Teaching Cadre, Peshawar Dated 24-07-2014 whereby in pursuance of the provision contained in sub rule (2) of rule 3 of

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Peshawar High Court

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the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer Rules, 1989) a criteria for appointment against Secondary School Teacher BPS-16 has been prescribed and consequently 40% quota has been specified for Senior /Certified Teachers in the following manner;

(a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years Service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in column No.3:

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

(Copy of impugned Notification is annexed as Annexure "D")

7. That resultantly for the purpose of promotion of Certified Teachers Respondent No.6 has issued final Seniority List at District Level whereby the Petitioner is in expected rather sure position to be promoted in the next higher post of Senior English Teacher (SET-BPS-16). Furthermore 18/19 years of his service is remaining for superannuation retirement according to present retirement policy which is expected to extend further.

(Copy of seniority list is annexed as Annexure "E")

8. That Senior Certified Teacher having required rather much more experience of 11 years and B.Ed as well as M.Ed Degree along with other higher education, Service Book/file of the Petitioner was required to be forwarded by Respondent No.7 to Respondent No.3 for promotion to SST (BPS-16) through general Official proceedings.

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Peshawar High Court
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9. That during following his promotion case; Petitioner has been informed by the office of Respondent No.3 that he cannot be considered for promotion to SST (BPS-16) for the reason that the Petitioner cannot meet the prescribed qualification under the impugned Notification to the extent that his subject combination in B.Sc is Botany, Zoology and Geography instead of Botany or Zoology along with Chemistry.

10. That being aggrieved from the impugned Notification to the extent of his grievance and having no other alternate remedy the Petitioner challenges the same amongst the following other grounds through the instant Writ Petition;

GROUND:

A. That admittedly the Petitioner has been awarded BSc Degree in the year 1991 by recognized and chartered University i.e. University of Peshawar/Respondents No.4 without any if and but neither there any illegality or irregularity to choose subject of Botany, Zoology and Geography as subject combination nor there any restriction upon the petitioner to choose such combination for grant of B.Sc degree and if there any notification regarding such issue; than to give retrospective effect of such notification by virtue of impugned Notification dated 24-07-2014 is not maintainable in the eyes of Law.

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Peshawar High Court
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B. That in the year, 1991 when Petitioner was granted B.Sc Degree and even till day of impugned Notification in 2014 there was no adverse effect of Subject Combination in B.Sc as Botany, Zoology and Geography as major subjects of Bio Science on relevant academic and employment requirements, that's why the Petitioner has been awarded B.Ed and M.Ed Degree, otherwise he would not have adopted Education as profession. Therefore it is mandate of Principal of Policy embodied in the Constitution of Islamic Republic of Pakistan, 1973

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to formulate notification/rules and policies in accordance with the secure rights of the citizens and each and every administrative act of respondent No.2 contrary to such rights is act as void *ab initio*; hence require judicial interference and modification.

- C. That operation of the impugned Notification with effect to consider the Petitioner unfit for promotion in the year, 2014 for the reasons of his subject combination at B.Sc passed in 1991 and that's too when otherwise he is Senior Cum fit on the basis of service record and is also SST trained; is in clear cut violation of Article, 27 of the Constitution with its heading "Safe Guard against discrimination in service" therefore the same is against the vested rights of the petitioner.
- D. That through the impugned Notification Respondent No.2 has not only miss interpret Rule-3 of Civil Servants (Appointment, Promotion and Transfer Rules,1989 but also failed to frame a legal procedure required for appointment through promotion, therefore the same is not warranted by law, procedure and applicable Rules.
- E. That the impugned notification is in itself contrary to law because where requirement of a post is special training (B.Ed) along with required experience and seniority, than to categorize subjects at B.Sc is illegal, therefore all subsequent proceedings and actions taken thereon would have no basis and would fall.
- F. That subject matter of the instant writ petition is to challenge the illegal and void part of impugned notification; hence as per Section 4 (b) (1) of KPK Service Tribunal Act, 1974, no appeal shall lie to a tribunal against an order or decision of a Departmental Authority determining the fitness or otherwise of a person to be appointed to or hold a particular post or to be promoted to a high post or grade.

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G. That the petitioner seeks leave of this honourable court to argue/raise additional grounds at the time of arguments.

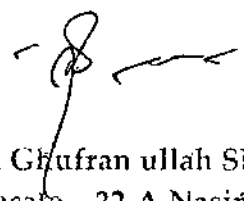
INTERRIM RELIEF;

All the three ingredients like prima facie case, balance of convenience and irreparable loss are in inclined in favour of the petitioner against the respondents, therefore by way of Interim Relief; Respondent No.2 & 3 may very graciously be directed not to process Appointment of SST (BS-16) through promotion under 40% specified quota for Senior/Certified Teachers (S/C-T) in operation of impugned Notification dated 24-07-2014 be suspend till final disposal of the instant writ Petition.

It is, therefore, most humbly prayed that the instant Writ Petition be accepted as prayed on the heading.

Petitioner

Through,


Syed Ghufan ullah Shañ
Advocate, 22-A Nasir
Mansion, Peshawar

CERTIFICATE;

It is certified that no other writ petition on the same subject has been filed before this honourable court.


Counsel

LIST OF BOOKS;

ATTESTED
EXAMINER
Peshawar High Court
28 FEB 2018

- 1- Constitution of Islamic Republic of Pakistan, 1973.
- 2- General Clause, Act
- 3- Rules of Business, 1985.
- 4- Any other Book according to need.


Counsel

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Deputy Registrar
03 FEB 2015

(42)
②

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR

W.P No 373-P/2015

Ihsan ullah Khan

VERSUS

**Chief Secretary Government of KPK at Civil Secretariat, Peshawar
and others**

AFFIDAVIT

I, Ihsan ullah Khan S/O Falya Qoos Khan, Presently residing at Room No. 10, Dir Maidan Palace, Gulbarg 1, Peshawar, Petitioner do hereby solemnly affirm and declare on Oath that the contents of the accompanying Writ Petition along with interim relief; are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Honourable Court.

Ihsan
Deponent

CNIC No. 15202-0812323-9

Dated 10-01-2015

Verified by;

Syed Ghufuran
Syed Ghufuran ullah Shah
(Advocate Peshawar)

No: <u>7955</u>
Certified that the above was verified on solemnly affirmation before me in office, this <u>10th</u> day of <u>Jan</u> 20 <u>15</u> by <u>Ihsan ullah Khan</u> s/o <u>Falya Qoos Khan</u> who was identified by <u>Syed Ghufuran ullah Shah</u> Who is personally known to me:
<i>Syed Ghufuran</i> 10/1/2015 Oath Commissioner Peshawar High Court, Peshawar.

ATTESTED
EXAMINER
Peshawar High Court
Syed Ghufuran
28 FEB 2018

~~FILED TODAY~~
~~Deputy Registrar~~
03 FEB 2015

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Judgment Sheet

PESHAWAR HIGH COURT
PESHAWAR

(Judicial Department)

Writ Petition No. 373-P/2015



Ihsan Ullah

Versus

Government of Khyber Pakhtunkhwa through Chief Secretary and others.

Date of hearing. 24.01.2018

Petitioner By *Syed Ghufromullah Bakh Advocate*

Respondents. By *Arshad Ahmad AAG*

JUDGMENT

MUSARR AT HILALI:- Vide our detailed judgement, even dated, in the connected writ petition No. 2659-P/2014 titled "Abdur Razaq Khan Vs Government of Khyber Pakhtunkhwa through Chief Secretary and others" this writ petition stands dismissed.

Waqar Ahmad Seth

JUDGE

Announced on;
Dated. 24.01.2018

Musarrat Hilali

JUDGE

D.B Hon'ble Mr. Justice Waqar Ahmad Seth and Hon'ble Justice Musarrat Hilali
'Amir'

CERTIFIED TO BE TRUE COPY

Examiner
Peshawar High Court, Peshawar
Authorized Under Article 8.7 of
The Qanun-e-Shahadat Order 1984

28 FEB 2018

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Judgment Sheet

PESHAWAR HIGH COURT
PESHAWAR
(Judicial Department)



Writ Petition No. 2659-P/2014

Abdur Razaq Khan
Versus
Government of Khyber Pakhtunkhwa through Chief
Secretary and others.

Date of hearing. 24.01.2018

Petitioner By Syed Ghufraan Ullah Bhatti Advocate

Respondents. By Wasim Uddin Khatib Advocate &
Arshad Ahmad Advocate

JUDGMENT

MUSARR AT HILALI:- Through this single judgement, we intend to dispose of the instant writ petition as well as the connected writ petitions No. 741-P/2015 titled "Hidayat Ullah Khan Vs Government of Khyber Pakhtunkhwa through Chief Secretary and others" and No. 373-P/2015 titled "Ihsan Ullah Vs Government of Khyber Pakhtunkhwa through Chief Secretary and others" as all of them have been filed

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EXAMINER
Peshawar High Court
28 FEB 2018

(45)

under Article 199 of the Islamic Republic of Pakistan, 1973 with the prayer that the impugned notification bearing No. SO (PE) 4-5/SSRC/Meeting/2003/ Teaching Cadre, Peshawar dated 24.7.2014 issued by the respondent No.2 to the extent of addition of 2nd Division alongwith Bachelor Degree for appointment of SST-16 under 20 % quota specified for Senior Head Primary School Teachers and to the extent of consideration of Bachelor (BSC) Degree with two subjects as Chemistry, Botany and Zoology for appointment of SST-16 under 40 % quota specified for Senior/Certified Teacher (SCT/CT), be declared against the scheme of appointments through promotion on the basis of seniority cum fitness and all such acts and omissions of respondents with effect to exclude the petitioners for the above reasons be declared as void ab initio, illegal, without lawful authority, jurisdiction and mandate of administrative norms , hence ineffective upon the established rights of petitioner as senior cum fit.

ATTESTEDEXAMINER
Peshawar High Court

28 FEB 2018

(46)

2. As per averments of the writ petitions, the petitioners were initially appointed as Primary School Teacher (BPS-7) and Certified Teacher (CT-BPS-09) respectively and on the basis of their higher qualification they were upgraded from time to time and are presently working in BPS-15 in the same cadre. It has further been averred that though they were upgraded in the same cadre of post but have never been promoted to next cadre throughout their career till date, that for the purpose of promotion, respondent No.6 has issued final seniority list of the PST Teachers and Certified Teacher at district level but recently Secretary to Government of Khyber Pakhtunkhwa/ respondent No.2 has issued the impugned notification whereby 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 a criteria for appointment against Secondary School Teacher BPS-16 has been prescribed and consequently 20 % quota has been specified for Primary School Head Teachers and 40 %

main

ATTESTED
EXAMINER
Peshawar High Court
28 FEB 2018

(47)

quota for Senior/Certified Teachers, that now the petitioners have been informed by the office of respondent No.6 that their case of promotion has not been considered for the reason that they do not meet the prescribed qualification hence being aggrieved from the impugned act and omission of the respondents, petitioners have approached this court to challenge the ultra vires of the notification.

We have heard learned counsel for the parties.

3. A preliminary point of jurisdiction was raised by learned AAG. It was contended that the petitioners are civil servants and under Article 212 of the Constitution of Islamic Republic of Pakistan, this court has no jurisdiction to entertain matters relating to terms and conditions of service of a civil servant including the matter referred to herein above and only the Service Tribunal constituted for the purpose has the jurisdiction to deal with the same.

man

ATTESTED
EXAMINED
Positawar High Court
28 FEB 2018

4. The claim of the petitioners squarely fall under the domain of Service Tribunal constituted for the purpose and jurisdiction of this court is barred under Article 212 of Constitution of Islamic Republic of Pakistan, 1973. Resultantly, these petitions are not maintainable which are dismissed accordingly. However, the petitioners may seek remedy before the proper forum, if so advised.

M. Ahmad Saeed



JUDGE

Announced on; Dated. 24.01.2018

M. Ahmad Saeed

JUDGE

CERTIFIED TO BE TRUE COPY

Examiner
Peshawar High Court, Peshawar
Authorized Under Article 87 of
The Courts-Chandari Order 1984

28 FEB 2018

12106
No. _____
Date of Presentation of Application 22/1/18
No of Pages 20
Copying Fee _____
Urgent Fee _____
Total _____
Date of Preparation of Copy _____
Date of Delivery of Copy _____
Received By _____

D.B Hon'ble Mr. Justice Waqar Ahmad Seih and Hon'ble Justice Musarrat Hihal

(48)

(49) (45)

LPS

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR.

Writ petition No. 373-P/2015.

IHSANULLAH.

Petitioner.

VERSUS

GOVERNMENT OF KHYBER PAKHTUNKHWA & OTHERS.

Respondent

PARAWISE COMMENTS BY & ON ON BEHALF OF RESPONDENT NO. 2, 3, & 6
Respectfully sheweth:-

PERLIMINARY OBJECTIONS:

1. That the petitioner is not an "AGGRIEVED" person with the meaning of Article 199 of the Constitution of Islamic Republic of Pakistan 1973.
2. That the petitioner has got no cause of action/locus standi to file the instant writ petition.
3. That the instant writ petition is not maintainable.
4. That the fact in issue pertains to the terms & Condition of service, therefore, the jurisdiction of this Hon,able court is barred under Article 212 of the Constitution.
5. That the petitioner has not come to this Hon,able court with clean hands.
6. That the petitioner is estopped by their own conduct.

ON FACTS:-

1. Para 01 relates to petitioner's academic record, hence, no comments.
2. As stated above.
3. Correct, but being a civil servant, he can,t invoke the Constitutional Jurisdiction of this Hon,able court. It is also a settled principle of law that even if an order of the Competent authority is void-ab-initio & malafide one then too, the service Tribunal has exclusive jurisdiction to step in & resolve the matter & the jurisdiction of civil court as well as Hon,able High court is specifically ousted under Article 212 of the Constitution.
4. In reply to para 04, that it is admitted fact that the petitioner was appointed as Certified Teacher (CT hereinafter) vide Notification No.996-901/EB/Secy/App, dated 20.03.2004, while now he is working

ATTESTED
EXAMINER
Peshawar High Court

28 FEB 2018

FILED TODAY

Deputy Registrar

26 OCT 2015

BPS-09

as SCT in BPS-15 meaning thereby that in such a short span of time he is elevated to BPS-15 but still mourning the policies of the Government which are made to maintain in efficiency in service & with the interest of public at large.

5. As stated above, however, it is a settled principle of law that promotion is not a vested right of a civil servant. It is pertinent to mention here that the August Supreme Court of Pakistan held that **"Where there is a change of grade or post for the better, there is an element of Selection involved that is promotion it is must earned automatically, but under an order of the competent authority to be passed after the consideration of the comparative suitability & the entitlement of that incumbents."**
6. In reply to para 06, that the Government was always empowered to enhance, qualification & standard of recruitment & promotion in order to maintain efficiency in service & no civil servant could claim any vested right in such policy of the Government. Moreover, the notification as agitated in this para has **already adjudicated by this Hon,able court in writ petition No.3073-P & 2297-P/2014, along with C.O.C No.306-P/2014 titled Muhamamd Sher Khan & 9 others Versus Government of KPK & Mian Zia-u-Rehman versus Government of KPK & others dated 27/10/2014, wherein, this Hon,able Court was kind enough to dismissed & the petitioner were directed to seek remedy before the competent forum in accordance with Law.**
7. As stated in foregoing paras.
8. As stated in foregoing paras, however, determination of fitness for promotion this fell within the domain of the competent authority.
9. In reply to para 09, Rules, regulations or policy of promotion could be changed, altered or amended in the interest of efficiency in service & such a change in rules, regulations or policy could not be challenged by an employee's expecting to be promoted to a higher position on the basis of existing rules & regulations because his right of promotion was to be determined with reference to qualification forces on eve of promotion. Furthermore, any change in Rules & regulations could not furnish a grievance to an employee.
10. That the instant petition is bereft of merit, hence, liable to be dismissed inter alia following grounds.

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Deputy Registrar

26 OCT 2015

ATTESTED
EXAMINER
Peshawar High Court
28 FEB 2018

GROUNDS.

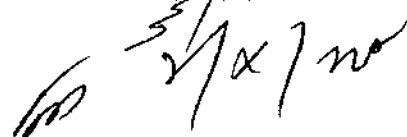
(S1) (VAF) 250

- A. Denied, where rules were changed/~~altered~~, then the later rules would supersede the former one & a civil servant is not supposed to be governed by set of rules of his own choice/desire.
- B. As stated above.
- C. As stated above, however, no legal/vested right of the petitioner has been infringed nor any provision of the Constitution have been violated.
- D. Denied, it is the prerogative of the Government to enhance/alter/amend the policies. It is also a settled principle of Law that the matters based on terms & conditions of service, the service Tribunal has exclusive domain to decide the matters even if fundamental rights of a civil servant has been violated.
- E. As stated in foregoing paras.
- F. In reply to this para, the petitioner statement is based on malafide & misconceiving one. Albeit, no appeal shall lie to a tribunal against the order of departmental authority determining the fitness, but, there is no cavil with the proposition that "determination of fitness for promotion is the exclusive domain of the competent authority.
- G. No Comments.

It is, therefore, humbly prayed that on acceptance of the above submissions, the instant writ petition may very graciously be dismissed in favour of the answering respondents with Cost.


Secretary,


Elementary & Secondary Education Department,
Khyber Pakhtunkhwa Peshawar.



Director,
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

ATTESTED
EXAMINER
Peshawar High Court
28 FEB 2018

FILED TODAY
Deputy Registrar
2/6 OCT 2015


Deputy Director (Establishment),
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

(S2) (48)

GP

BEFORE THE PESHAWAR HIGH COURT PESHAWAR.

WRIT PETITION NO. 373-P/2015.

IHSANULLAH

Petitioner .

VERSUS

1. Government of Khyber Pakhtunkhwa & Others.

Respondent .

AFFIDAVIT

I, Mr. Majeed ullah Assistant Director (Litigation-I) Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar, do hereby solemnly affirm and declare that the contents of the accompanying Para wise comments/Written Reply submitted by respondent No 2,3 & 6 are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon, able Court.

Majeed Ullah
Deponent.

17707-1628150-5

Identified by

A. J. Khan
Supdt. (T)
Advocate General,
Peshawar.

No. *5909*
Certified that the above was verified on solemnly affirmation before me in office, this *26th* day of *Oct*, 2015, by *Majeed Ullah* s/o *A.D. Elementary Education* who was identified by *A. J. Khan* Who is personally known to me
M. J. Khan
Cath. Commissioner
Peshawar High Court, Peshawar.

FILED TODAY

Deputy Registrar

26 OCT 2015

CERTIFIED TO BE TRUE COPY

Examiner
Peshawar High Court, Peshawar
Authorized Under Article 8.7 of
The Qanun-e-Shahadat Order 1984

28 FEB 2018

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IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P. No. 373-P/2015

Ihsan UllahPetitioner

Versus

Govt. of Khyber Pakhtunkhwa and othersRespondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENT NO.4

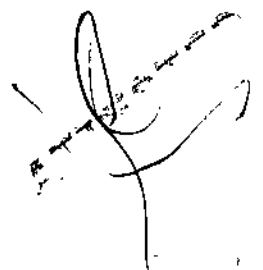
Respectfully Sheweth

Reply to Facts:

1. Para Nos.1 to 10 of the writ petition need no comments.

Reply to Grounds:-

- A. Ground-A of the writ petition is correct to the extent that the petitioner had been awarded B.Sc. Degree in the year 1991 with subject combination of Botany, Zoology and Geography. To keep the record straight it is to add that a B.Sc. student will have to appear in the 03 subjects out of the list along with compulsory subjects of Islamic Studies/Ethics (for non-Muslims) and Pakistan Studies (Syllabus as **Annex:-PC/1**). The petitioner adopted for the Botany, Zoology and Geography out of a list of 13 subjects. It is important to add that in such like cases the candidates opted to appear in the paper of Chemistry as an Additional Subject whereafter they were granted DMC of the said exam (Chemistry).
- B. Ground-B of the writ petition needs no comments. However, it is to add that in such like situation a number of Candidates opted to appear in the subject/paper of Chemistry as an Additional Subject in order to make themselves eligible for the



subject posts.

(54)

C-G. Ground-C of the writ petition needs no comments.


It is, therefore, respectfully prayed that on acceptance of these Parawise Comments, the writ petition of the petitioner may graciously be dismissed with cost.

Through

Respondent No.4

Wascem-ud-Din Khattak
Advocate,
Supreme Court of Pakistan

Dated: ____ .10.2015


A-110758

SS

IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P. No. 373-P/2015

Ihsan UllahPetitioner

Versus

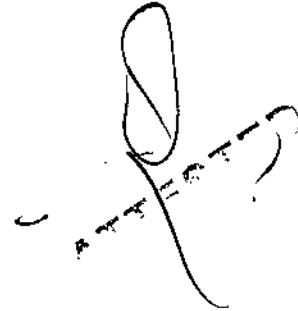
Govt. of Khyber Pakhtunkhwa and othersRespondents

Affidavit

2

I, Waseem-ud-Din Khattak, as per instructions of the answering Respondent No.4, do hereby affirm and declare on oath that the contents of this Written Statement are true and correct to the best of my knowledge and nothing has been concealed from this Hon'ble Court.

Deponent



56



Annex-PC/1

18993

①

UNIVERSITY OF PESHAWAR

**STATUTES REGULATIONS
AND
SYLLABUS**

for the
EXAMINATION
of

B.A./B.Sc./B.Th Part I and Part II
(2 Year Course)

for
1992 and
(Onwards)

[Handwritten scribbles and a wavy line]

Price - Rupees 30.00

[Handwritten signature]
ATTACHED

59

The Chief Secretary to Government of
Khyber Pukhtoonkhwa Peshawar;

Through

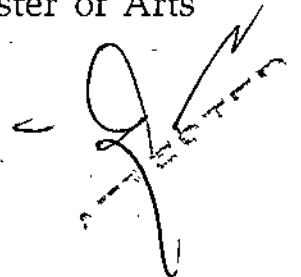
Director Elementary & Secondary Education Khyber
PukhtunKhwa Peshawar

DEPARTMENTAL APPEAL/REPRESENTATION UNDER
RULE, 3 OF KP CIVIL SERVANTS APPEAL RULES, 1986
AGAINST THE IMPUGNED NOTIFICATION BEARING NO.
SO (PE) 4-5/SSRC/MEETING/2003/TEACHING CADRE,
PESHAWAR DATED 24-07-2014, WHEREBY THE APPELLANT
HAS BEEN EXCLUDED FROM PROMOTION PROCESS DUE
TO SUBJECT COMBINATION.

Prayer:

On acceptance of the instant departmental Appeal the
impugned Order bearing No. SO (PE) 4-
5/SSRC/Meeting/2003/Teaching Cadre, Peshawar Dated 24-
07-2014 passed by respondent No. 2 be set aside and the
appellant be promoted as per his seniority.

1. That in the year,1991 the appellant passed his Bachelor Degree in Science (B.Sc) with subject combination of Botany, Zoology and Geography as a regular candidate from Government Degree College Chitral and was awarded Bachelor of Science Degree from University of Peshawar.
2. That in the year, 1995 the appellant passed professional Course for Certified Teacher (CT-General) from Government Elementary College Chitral. Furthermore the appellant also possess his professional Degree of Bachelor of Education (B Ed) and Master of Education (M.Ed) granted by Allama Iqbal Open University Islamabad Respondent No.5 beside Master of Arts (M.A) granted by University of Peshawar.

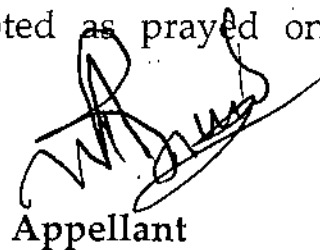
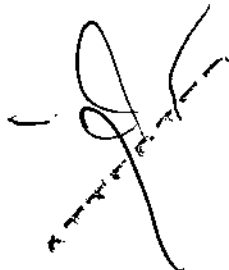

DIRECTOR

60

3. That the appellant was appointed as Certified Teacher (CT-BS-09) on 20-03-2004 Vide Notification Endorsement bearing No. 996-901/EB/SECY/APPTT.
4. That after consideration and acceptance of his higher and professional qualifications as well as his experience in terms of service benefit; the appellant has been up graded from time to time at the same cadre and presently working at BPS-15 as Senior Certified Teacher. It is also pertinent to mention here that the appellant has been granted special allowances in shape of advance increments applicable for higher education in the subject cadre.
5. That although the appellant has been upgraded in the same cadre of post i.e. CT but never promoted to the next cadre throughout his career of 11 years Service i.e. 20-03-2004 till date due to variation in Government policies from time to time.
6. That during following his promotion case; Appellant has been informed by the office of Respondent of EDO Chitral that he cannot be considered for promotion to SST (BPS-16) for the reason that the Petitioner cannot meet the prescribed qualification under the impugned Notification to the extent that his subject combination in B.Sc is Botany, Zoology and Geography instead of Botany or Zoology along with Chemistry, hence the instant appeal.

It is, therefore, most humbly prayed that the instant Departmental appeal be accepted as prayed on the heading.

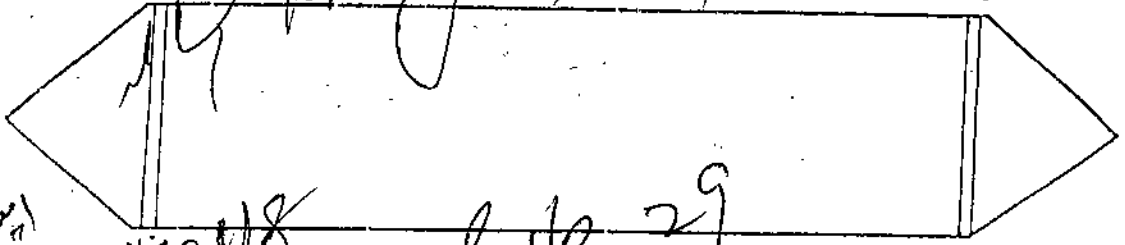
Dated:- 22-01-2015



Appellant

Ihsan Ullah
S/O Muhammad Failqoos Khan
R/O Village Shogram,
Tehsil Mastuj District
Chitral
Cell No. 0344-9733859

بعدالت



ایمانت

2018ء منجانب
بنام

29 مارچ 2018ء

دعوت

موزخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکے

ایمانت

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کابل اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور صولی چیک درو پیار عرضی دعویٰ اور درخواست ہر قسم کی تصدیق

ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی

نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور

کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار

ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ

برداشتہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔

کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی

مذکورہ کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند رہے۔

2018ء

المقوم

واہ الع

کے لئے منظور ہے۔

بمقام

Attested
Accepted

BEFORE KHYBER PAKHTUN KHAWA SERVICE TRIBUNAL PESHAWAR.

SERVICE APPEALS NO, 572/2018.

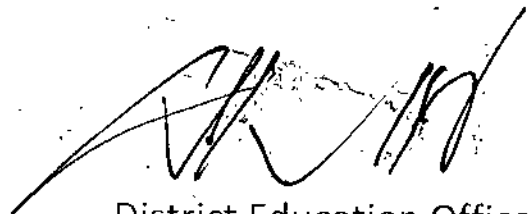
Ihsanullah.....Appellant.

VERSUS.

Government of Khyber Pakhtunkhawa &
Others.....Respondents.

INDEX.

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District Education Officer
(Male) Chitral.

7-1-18

(1)

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

Service Appeal No, 572/2018.

Ihsanullah.....Appellant.

Government of Khyber Pakhtun Khawa &
Others.....Respondent.

**PARA WISE COMMENTS BY AND ON BEHALF OF
RESPONDENTS NO,2 TO 5 .**

Respectfully Shewth:-

PERLIMINARY OBJECTIONS:-

1. That the Appellant is not an agrived person with the meaning of Article 199 of the constitution of Islamic Republic of Pakistan 1973.
2. That the Appellant has got no cause of action/locus standi to file the instant Appeal.
3. That the instant appeal is not maintain able in the Eye of law.
4. That Appellant has not come to this Honorable Tribunal with clean hands,
5. That the appellant has estopped by his own conduct.
6. That the appeal is badly time bared.

ON FACTS:-

1. Para No,1 relates to appellants academic record, hence no comments.
2. As stated above.
3. Correct.
4. In reply to Para-04, that it is admitted fact that the Appellant was appointed as certified teacher BPS-09 vide Notification No,896-901/EB/Secy/App, dated 20/3/2004, while now he is working as (SCT)

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Senior Certified Teacher in BPS-16 meaning thereby that in such a short span of time he is elevated to BPS-16 but still mourning the policies of the Government which are made to maintain in efficiency in Service and with the interest of Public at large.

5. As stated above, however, it is a settled principle of law that promotion is not a vested right of a civil servant. It is pertinent to mention here that the August Supreme Court of Pakistan held that " Where there is a change of grade or post for the better, there is an element of selection involved that is promotion, it is must earned automatically, but under an order of the competent authority to be passed after the consideration of the comparative suitability and the entitlement of that incumbent"
6. In reply to Para 06, that the Government was always empowered to enhance, qualification & standard of recruitment & promotion in order to maintain efficiency in service & no civil servant could claim any vested right in such policy of the Government.
7. As stated in foregoing Paras.
8. As stated in foregoing Paras, however, determination of fitness for promotion is falling within the domain of the competent authority.
9. In reply to para No, 9, Rules, regulation or policy of promotion could be changed, altered or amended in the interest of efficiency in service & such a change in rules, regulations or policy of promotion could not be challenged by an employee's expecting to be promoted to a higher position on the basis of existing rules and regulations because his right of promotion was to be determined with reference to qualification force on eve of promotion. Furthermore, any change in rules & regulations could not be furnish a grievance to an employee. The instant appeal is bereft of merit, hence, liable to be dismissed inter alias on following grounds.

GROUND.

- A. Denied, where rule were changed/altered, then the later rules would supersede the former one & a civil servant is not supposed to be governed by set of rules of his own choice/desire.

- 13
- B. As stated above.
 - C. As stated above, however, no legal/vested right of the appellant has been infringed nor has any provision of the constitution been violated.
 - D. Denied, it is the prerogative of the Government to enhance/alter/amend the policies. It is also a settled principle of law that the matters based on terms and conditions of service, the Service Tribunal has exclusive domain to decide the matters even if fundamental rights of a civil servants has been violated. However the answering respondents have acted well according to policy & law.
 - E. As stated in foregoing para,s.
 - F. Needs No comments.
 - G. No comments.

It is, therefore, humbly prayed that on acceptance of the above submission, the instant appeal may very graciously be dismissed in favor of the answering respondents with cost.



**District Education Officer
(Male) Chitral.**

BEFORE KHYBER PAKHTUN KHAWA SERVICE TRIBUNAL PESHAWAR.

SERVICE APPEALS NO, 572/2018.

Ihsanullah.....Appellant.

VERSUS.

Government of Khyber Pakhtunkhawa &

Others.....Respondents

AFFIDAVIT.

I Munir Ahmad SST BPS-17 CNIC No, 15201-0576541-7 at GMS Jughoor Chitral do hereby solemnly affirm and declare on oath that the contents of accompanying Para wise comments on behalf of respondent No,2 to 5 are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Service Tribunal.



DEPONENT

CNIC No, 15201-0576541-7

Identified by :-

**Assistant Advocate General
Khyber Pakhtun Khawa
Peshawar.**

BEFORE THE KHYBER PAKHTUNKHUWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 572 2018


Ihsan Ullah

VERSUS

Chief Secretary Govt: of KPK, Peshawar and others

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11	Wakalat Nama		


Appellant

Through

.....
Syed Ghufuran ullah Shah
(Advocate Peshawar)
Office; 22-A Nasir Mansion
Railway Road, Peshawar
Cell No.0334-9185580

①

**BEFORE THE KHYBER PAKHTUNKHUWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No. 572 2018.

Ihsan Ullah
S/O Muhammad Nailqoos Khan,
Presently residing at Room No.10,
Dir Maidan Palace, Gulberg 1, Peshawar Cant.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 4521

Date 26-3-2018

.....Appellant

VERSUS

1. Government of Khyber Pakhtunkhaw through Chief Secretary at Civil Secretariat, Peshawar.
2. Secretary to Government of Khyber Pakhtunkhaw, Elementary and Secondary School Education Department, Civil Secretariat Peshawar.
3. Director Elementary & Secondary Education Government of Khyber Pakhtunkhaw Peshawar.
4. Deputy Director (Establishment) Directorate of Elementary & Secondary Education Khyber Pakhtunkhaw Peshawar.
5. EDO, Elementary & Secondary Education Distt: Chitral.

.....Respondents

Filed to-day

Registrar

26/3/18

Appeal U/S 4 of KPK, Service Tribunal Act 1974

Prayer:

On acceptance of the instant Service Appeal, the impugned Notification bearing No. SO (PE) 4-5/SSRC/Meeting/2003/Teaching Cadre, Peshawar dated 24-07-2014 issued by respondent No. 2 to the extent of addition of consideration of Bachelor (BSC) Degree with

2

two subjects as Chemistry, Botany and Zoology for promotion to SST (BPS-16) under 40% quota specified for Senior/Certified Teachers (SCT/CT) by excluding the appellant having bachelor degree (B.Sc) of subject combination as Zoology, Botany and Geography; be declare against the scheme of promotion on the basis of seniority cum fitness and all such acts and omissions of respondents with effect to exclude the appellant from the process of promotion to SST (BPS-16) under 40% quota for the reason of such subject combination in B.Sc Degree (although having qualification of B.Ed, M.Ed and ma along with 14 years relevant experience) may also be declare as void *ab initio*, illegal, unlawful, without lawful authority and justification; hence appellant be promoted in accordance with his seniority. Any such relief which this honourable Tribunal deems proper and just be granted to the appellant against the respondents keeping in view the circumstances of the case.

Respectfully Sheweth;

Brief facts and grounds giving rise to the instant service are as under;

1. That in the year,1991 the appellant passed his Bachelor Degree in Science (B.Sc) with subject combination of Botany, Zoology and Geography as a regular candidate from Government Degree College Chitral and was awarded Bachelor of Science Degree from University of Peshawar.
(Copy of Original Degree along with DMC is annexed as Annexure "A")

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2. That in the year, 1995 the appellant passed professional Course for Certified Teacher (CT-General) from Government Elementary College Chitral. Furthermore the appellant also possess his professional Degree of Bachelor of Education (B Ed) and Master of Education (M.Ed) granted by Allama Iqbal Open University Islamabad beside Master of Arts (M.A) granted by University of Peshawar.
(Copies of Educational Testimonials are Annexure "B")
3. That the appellant was appointed as Certified Teacher (CT-BS-09) on 20-03-2004 Vide Notification Endorsement bearing No. 996-901/EB/SECY/APPTT issued by Respondent No.7.
(Copy of Appointment Letter is Annexure "C")
4. That after consideration and acceptance of his higher and professional qualifications as well as his experience in terms of service benefit; the petitioner has been up graded from time to time at the same cadre and presently working at BPS-15 as Senior Certified Teacher. It is also pertinent to mention here that the appellant has been granted special allowances in shape of advance increments applicable for higher education in the subject cadre.
5. That although the appellant has been upgraded in the same cadre of post i.e. CT but never promoted to the next cadre throughout his career of 14 years Service i.e. 20-03-2004 till date due to variation in Government policies from time to time.
6. That in the year, 2014 Secretary to Government of Khyber Pakhtunkhaw/Respondent No.2 issued the impugned Notification bearing No. So (PE) 4-5/SSRC/Meeting/2003/Teaching Cadre, Peshawar Dated 24-07-2014 whereby in pursuance of the provision contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhaw Civil Servants (Appointment, Promotion and Transfer Rules, 1989) a criteria for appointment against Secondary School Teacher BPS-16 has been prescribed and consequently 40% quota has been specified for Senior /Certified Tea . . . the following manner;

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(a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years Service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in column No.3:

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

(Copy of impugned Notification is annexed as Annexure "D")

7. That resultantly for the purpose of promotion of Certified Teachers Respondent No.5 has issued final Seniority List at District Level whereby the appellant was in good position to be promoted in the next higher post of Senior English Teacher (SET-BPS-16). Furthermore 18/19 years of his service is remaining for superannuation retirement according to present retirement policy which is expected to extend further.

(Copy of seniority list is annexed as Annexure "E")

8. That Senior Certified Teacher having required rather much more experience of 11 years and B.Ed as well as M.Ed Degree along with other higher education, Service Book/file of the appellant was required to be forwarded by Respondent No.4 to Respondent No.3 for promotion to SST (BPS-16) through general Official proceedings.

9. That during following his promotion case; Appellant was informed by the office of Respondent No.3 that he cannot be considered for promotion to SST (BPS-16) for the reason that he cannot meet the prescribed qualification under the impugned Notification to the extent that his subject combination in B.Sc is Botany, Zoology and Geography instead of Botany or Zoology along with Chemistry.

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10. That the appellant filed a Writ Petition bearing No.WP.No.373-P/2015 before the Peshawar High Court Peshawar, which was disposed on 24-01-2018, whereby the appellant has been advised to approach this honourable Tribunal.

(Copy of Order/Judgment of Peshawar High Court is annexed as Annexure "F")

11. That as a matter of right and having no other remedy; the appellant approaches this honourable Tribunal inter alia on the following amongst the following others;

GROUND:

A. That admittedly the Appellant has been awarded BSc Degree in the year 1991 by recognized and chartered University i.e. University of Peshawar without any if and but neither there any illegality or irregularity to choose subject of Botany, Zoology and Geography as subject combination nor there any restriction upon the appellant to choose such combination for grant of B.Sc degree and if there any notification regarding such issue; than to give retrospective effect of such notification by virtue of impugned Notification dated 24-07-2014 is not maintainable in the eyes of Law.

B. That in the year, 1991 when appellant was granted B.Sc Degree and even till day of impugned Notification in 2014 there was no adverse effect of Subject Combination in B.Sc as Botany, Zoology and Geography as major subjects of Bio. Science on relevant academic and employment requirements, that's why the appellant has been awarded B.Ed and M.Ed Degree, otherwise he would not have adopted Education as profession.

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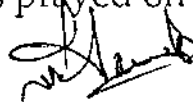
Therefore it is mandate of Principal of Policy embodied in the Constitution of Islamic Republic of Pakistan, 1973 to formulate notification/rules and policies in accordance with the secure rights of the citizens and each and every administrative act of respondent No.2 contrary to such rights is void *ab initio*; hence require judicial interference and modification.

- C. That operation of the impugned Notification with effect to consider the appellant unfit for promotion in the year, 2014 for the reasons of his subject combination at B.Sc passed in 1991 and that's too when otherwise he is Senior Cum fit on the basis of service record and is also SST trained, is in clear cut violation of Article, 27 of the Constitution with its heading "Safe Guard against discrimination in service" therefore the same is against the vested rights of the petitioner.
- D. That through the impugned Notification Respondent No.2 has not only miss interpret Rule-3 of Civil Servants (Appointment, Promotion and Transfer Rules, 1989 but also failed to frame a legal procedure required for promotion, therefore the same is not warranted by law, procedure and applicable Rules.
- E. That the impugned notification is in itself contrary to law because where requirement of a post is special training (B.Ed) along with required experience and seniority, than to categorize subjects at B.Sc is illegal, therefore all subsequent proceedings and actions taken thereon would have no basis and would fall.
- F. That in light of Article, 212 of the Constitution as well Order of the Peshawar High Court, this honourable Tribunal has ample power to entertain the subject matter.

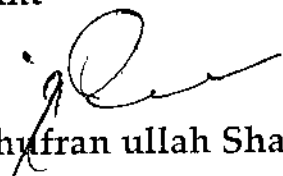
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G. That the appellant seeks leave of this honourable Tribunal to argue/raise additional grounds at the time of arguments.

It is, therefore, most humbly prayed that the instant service appeal be accepted as prayed on the heading.

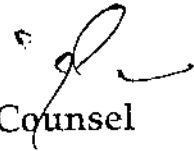

Appellant

Through,


Syed Ghufuran ullah Shah
Advocate, 22-A Nasir
Mansion, Peshawar

CERTIFICATE:

It is certified that no other service appeal on the same subject has been filed before this honourable Tribunal.


Counsel

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BEFORE THE KHYBER PAKHTUNKHUWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____ 2018

Ihsan Ullah

VERSUS

Chief Secretary Govt: of KPK, Peshawar and others

AFFIDAVIT;

I, Ihsan Ullah S/O Muhammad Failqoos Khan, Presently residing at Room No.10, Dir Maidan Palace, Gulberg 1, Peshawar Cant., Appellant do hereby solemnly affirm and declare on Oath that the contents of the service appeal; are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Honourable *Tribunal*.

Ihsan Ullah

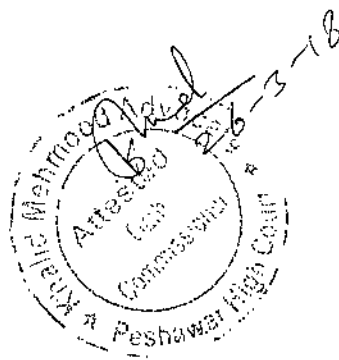
Deponent

CNIC.No. 15202-0812323-9

Verified by;

[Signature]

Syed Ghufrān ullah Shah
(Advocate Peshawar)



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BEFORE THE KHYBER PAKHTUNKHUWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____ 2018

Ihsan Ullah

VERSUS

Chief Secretary Govt: of KPK, Peshawar and others

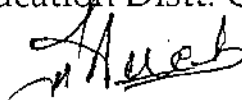
ADDRESSES OF PARTIES

APPELLANT;


Ihsan Ullah S/O Muhammad Faizqos Khan, Presently residing
at Room No.10, Dir Maidan Palace, Gulberg 1, Peshawar Cant.

RESPONDENTS;

1. Government of Khyber Pakhtunkhaw through Chief Secretary
at Civil Secretariat, Peshawar.
2. Secretary to Government of Khyber Pakhtunkhaw, Elementary
and Secondary School Education Department, Civil Secretariat
Peshawar.
3. Director Elementary & Secondary Education Government of
Khyber Pakhtunkhaw Peshawar.
4. Deputy Director (Establishment) Directorate of Elementary &
Secondary Education Khyber Pakhtunkhaw Peshawar.
5. EDO Elementary & Secondary Education Distt: Chitral


Appellant

Through,


Syed Ghufuran Ullah Shah
Advocate-Peshawar

BEFORE THE SERVICE TRIBUNAL ICPC PESHAWAR.

IHSAN ULLAH V/S GOVT ICPC ETC.



APPLICATION FOR SUBMITTING SECURITY FEE.

Respectfully Sheweth,

① That the above mentioned case is pending before this honorable Tribunal which is fixed for dated 29/04/2019.

② That the Honorable Tribunal may give instruction to deposit the security fee but due to the reason that the client belong to poor living area of Chitral that's why he cannot deposit the security fee on time.

Therefore, it is respectfully may kindly give the order for the payment of security fee.

Date: - 16/04/2019.

Put up to the court with relevant appeal.

Deo

22/4/19.

Through Counsel
SYED GHUFRAN ULLAH SHAH
APPLICANT

BEFORE THE SERVICE TRIBUNAL ICPC PESHAWAR.

IHSAN ULLAH V/S GOVT ICPC ETC.

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Date:- 16/04/2019.

Through Counsel
SYED GHUFRAN ULLAH SHAH
ADVOCATE

BEFORE THE SERVICE TRIBUNAL ICPC PESHAWAR.

IHSAN ULLAH V/S GOVT. ICPC ETC.

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Date:- 16/04/2019.

Through Counsel
SYED GHUFRAN ULLAH SHAH
ADVOCATE