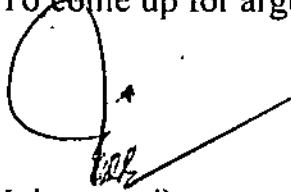


20.12.2022


Learned counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General alongwith Mr. Tufail, Assistant for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments on 16.03.2023 before D.B.

SCANNED
16/12/22
Pechawar



(Mian Muhammad)
Member (E)




(Salah-ud-Din)
Member (J)

10.06.2022

Junior to counsel for the appellant present.

Muhammad Riaz Khan Paindakheil learned Assistant Advocate General alongwith Tufail Assistant for respondents present.


File to come up alongwith connected Service Appeal No.839/2021 filed by the appellant on 27.07.2022 before S.B.


(Rozina Rehman)
Member (J)

27.07.2022

Counsel for the appellant present. Mr. Muhammad Adeel Butt. Additional Advocate General alongwith Mr. Faheem Khan, Assistant for official respondents present.

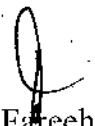
File to come up alongwith connected Service Appeal No. 839/2021 titled "Khair Ullah Vs Education Department" on 20.10.2022 before D.B.



(Fareeha Paul)
Member (E)

20th Oct, 2022

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakheil, Asst: AG for respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has not prepared the case. To come up for arguments on 20.12.2022 before D.B.

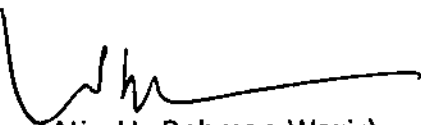

(Fareeha Paul)
Member(Executive)


(Kalim Arshad Khan)
Chairman

27.01.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, learned Addl. AG for official respondents No. 1 & 3 present. None present on behalf of private respondents No. 4 to 16, hence proceeded ex-parte.

Reply/comments on behalf of official respondent are still awaited. Learned AAG sought time for submission of reply/comments. Granted. To come up for reply/comments before the S.B on 08.03.222.


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

08.03.2022

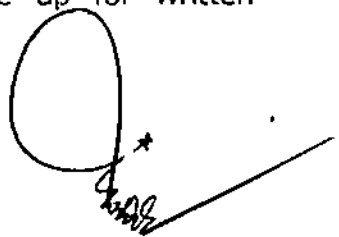
Due to retirement of the Hon'able Chairman, the case is adjourned to 29.03.2022 before S.B for the same.


Reader

29.03.2022

Clerk of learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.

Written reply/comments on behalf of respondents not submitted. Notices be issued to the respondents for submission of written reply/comments. Adjourned. To come up for written reply/comments on 10.06.2022 before S.B.


(MEHAN MUHAMMAD)
MEMBER(E)

Khair Ullah, 838/2021

16.09.2021

Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant argued that seniority list of Subject Specialist/Head Master (BS-17) issued by the respondents on 25.05.2017 indicates seniority of the appellant at serial No. 292 whereas in the subsequent seniority list issued on 13.12.2017 reflects seniority of the appellant at serial No. 686. The appellant filed departmental appeal and during pendency of his appeal he attained the age of superannuation on 14.09.2020, hence, the instant service appeal instituted for proforma promotion from BS-17 to BS-18. Learned counsel for the appellant was confronted with a pertinent question of limitation that the impugned seniority list was issued on 13.12.2017 whereas he submitted departmental appeal for rectification/correction on 10.09.2020. It was contended that limitation starts from the date of communication of an impugned order and in the instant case he was not communicated the impugned seniority list officially. A copy of the impugned seniority list was obtained from colleague when promotion of others (junior to him) came to his notice. Moreover, no limitation runs against recurring case of action and reliance is placed on 2002 PLC (CS) 1388. It was further contended that two cases of identical nature in service appeal No. 8140/2020 and 8141/2020 titled Akhtar Zaman-vs-E&SE Department Khyber Pakhtunkhwa and others are already admitted and fixed for regular hearing before D.B on 17.09.2021.

Points raised need consideration. The appeal is provisionally admitted to regular hearing, subject to all just and legal objections including limitaiton. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time or extension of time is not sought, the office shall submit the file with a report of non-compliance. File to come up for arguments on 27.01.2022 before the D.B.

Approved & Processed
Security & Process fee

(Mian Muhammad)
Member(E)

16.06.2021

Junior to counsel for the appellant present and requests for adjournment due demise of mother of learned senior counsel. Adjourned to 16.09.2021 for preliminary hearing before S.B.



Chairman

The appeal of Mr. Khairullah Ex-Head Master (Retired) GHS Mami Khel, District Karak received today i.e. on 08/01/2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Annexures of the appeal may be attested.
- 3- Appeal has not been flagged/marked annexures' marks.
- 4- Copy of notification dated 27.3.2010 mentioned in para-3 of the appeal (Annexure-B) is not attached with the appeal which may be placed on it.
- 5- Eighteen more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 36 /S.T,

Dt. 11/01/2021


REGISTRAR /
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Noor Muhammad Khattak Adv. Pesh.

Note:
Sir,

*All objections have been removed,
hence re-submitted today dated 12/1/2021.*

M. J.

12/1/2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

APPEAL NO. 838 / 2021

KHAIR ULLAH

VS

EDUCATION DEPTT:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1	Memo of appeal	1- 4.
2	Appointment order	A	5-
3	Notification dated 27.03.2010	B	10- 13.
4	Seniority lists	C & D	14- 35.
5	Departmental appeal	E	36.
6	Retirement Notification	F	37.
7	Vakalat nama	38.

APPELLANT

THROUGH:

NOOR MOHAMMAD KHATTAK
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. _____ / **2021**

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 501

Mr. Khair Ullah, Ex-Head Master (Retired) (BPS-17),
GHS Mami Khel, District Karak.

Dated 08/01/2021

.....**APPELLANT**

VERSUS

- 1- The Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 4- Mr. Akbar Jan, Principal (BS-18), GHS Behzadi, Chakar Kot, Kohat.
- 5- Mr. Wali Ayaz, Instructor (BPS-18), RITE (M) Ghoriwala, Bannu.
- 6- Mr. Jamil-Ur-Rehman, SS Islamiyat (BS-18), GHSS No.4, D.I Khan.
- 7- Mr. Amin Ullah Khan, Principal (BS-18) GHS Ghulam Jan Baka Khel, Bannu.
- 8- Mr. Iftan Ali Shah, SS Biology (BS-18), GHSS Hakim Havaid, Bannu.
- 9- Mr. Hafiz Raza Ullah Khan, Principal (BS-18), GHSS No.4, Bannu.
- 10- Mr. Noor Aslam, SS Chemistry (BS-18) GHSS Darra Pezu, Lakki Marwat.
- 11- **Filed to-day** Mr. Muhammad Faiz, SS Economics (BS-18), GHSS Nurar, Bannu.
- 12- **Registrar** Mr. Umar Shah, SS Chemistry (BS-18), GHSS Tajazai, Lakki Marwat.
- 13- Mr. Safi Ullah Khan, SS Maths (BS-18), GHSS Hakim Haved, Bannu.
- 14- Mr. Hidayat Ullah Khan, SS Statistics (BS-18), GHSS Nurar, Bannu.
- 15- Mr. Muhammad Ishaq, SS English (BS-18), GHSS Nurar, Bannu.
- 16- Mr. Nijat Ullah Khan, SS English (BS-18) GHSS Hakim Haved, Bannu

.....**RESPONDENTS**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED SENIORITY LIST DATED 13.12.2017 WHEREBY NAME OF THE APPELLANT HAS WRONGLY BEEN MENTIONED AT SERIAL NO. 686 AND INSTEAD OF SERIAL NO. 291 AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this appeal the impugned Notifications dated 13.12.2017 may very kindly be rectified/corrected and name of the appellant may be enlisted at his previous position i.e. 292. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

- 1- That appellant was initially appointed as SET (BPS-16) vide order dated 07.01.1989 on the proper recommendation of the Departmental selection committee. Copies of the orders are attached as annexure.....**A.**
- 2- That right from appointment till date the appellant is performing his duty quite efficiently and up to the entire satisfaction of his superiors
- 3- That during service as SET (BPS-16) the appellant was promoted on the basis of seniority cum fitness to the post of Head Master (BPS-17) on the proper recommendation of Departmental Promotion Committee vide Notification dated 27.03.2010. That after promotion to the post of Head Master the appellant was adjusted at GHS Mami Khel, Karak and as such the appellant submitted his charge report and started performing his duty with devotion. Copy of the Notification is attached as annexure **B.**
- 4- That according to the combined seniority list of S.S and Headmasters circulated on 25.5.2017 the appellant appeared at serial No.292 but astonishingly in the seniority list circulated on 13.12.2017 the appellant was placed at serial No.686 instead of

291 whereby many junior colleagues of the appellant enlisted as senior to the appellant. Copies of the seniority lists and impugned Notifications are attached as annexure..... **C & D.**

5- That appellant feeling aggrieved from the impugned seniority list dated 13.12.2017 preferred Departmental appeal and during the pendency of Departmental appeal the appellant has been retired from service on the basis of superannuation vide Notification dated 14.09.2020 but no response has been given by the appellate authority on the Departmental appeal of appellant so far. Copies of the Departmental appeal & retirement Notification are attached as annexure..... **E & F.**

6- That appellant feeling aggrieved and having no other remedy but to file the instant service appeal on the following grounds amongst the others.

GROUND:

- A- That the impugned seniority list against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be rectified/corrected.
- B- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan-1973.
- C- That the respondents acted in arbitrary and malafide manner while issuing the impugned seniority list dated 13.12.2017 and disturbing the right seniority position of the appellant.
- D- That the appellant has served the Department for a long period with unblemished service record and having seniority cum fitness, but the respondents on the basis of wrong seniority list many junior colleagues were promoted to (BS-18) while ignored the appellant.
- E- That the impugned seniority list dated 13.12.2017 is violative of section-8 of the Civil Servant Act, 1973 read with Rule- 17 of the Khyber Pakhtunkhwa Civil Servant Appointment, Promotion & Transfer Rules, 1989.
- F- That the impugned seniority list dated 13.12.2017 against the principle of natural justice, hence not tenable and liable to be rectified/corrected.

G- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

APPELLANT



KHAIR ULLAH

THROUGH:

NOOR MOHAMMAD KHATTAK

KAMRAN KHAN

&

**MIR ZAMAN SAFI
ADVOCATES**

Approval
 شیخ اسد زہ عیوبی
 خیمہ اقد جوازی

S No - 275
 - 5.1986 - 713

(5)

OFFICE OF THE DIRECTOR OF EDUCATION (SCHOOLS) N.W.F.P., PESHAWAR.

APPROVAL.

Annex "A"

Consequent upon the approval given by the Departmental Selection Committee in their meeting held on 19.12.1988, the following Senior English Teacher/SET Agriculture SET Tech:/W-Is and NPS-14/B-15 are hereby placed in NPS-14 (520-30)-730/35-1010 B-15 (900-55-2000) from the date of their taking over charge against SET Post from the date of which they are due for appointment against SET/SET Agriculture etc; post on their turn on merit which ever is later as given against each.

S.No.	Name of SET/Address.	Marks obtained;	Remarks.
<u>Zone-II/Peshawar/Mardan.</u>			
1.	Said Mahmood, MA Tech: Edu: GHS, Garhi Kapura, Mardan.	62%/79.	13.4.1980.
2.	Aurang Zeb, BSc MED SET GHS, Sherpao, Charsadda.	854/1200/78-79.	9.11.1980.
3.	Abdul Hakim, MED SET G.H.S., Pir Sabaq.	2432/3200/80.	17.9.1981.
4.	Mashtaq Ahmad, BA BED SET G.H.S., Swabi, Mardan.	527/1000/71.	13.12.1982.
5.	Habibur Rehman, MSc BED G.H.S., Serai.	546/1000/84.	1.10.1985.
6.	Mohammad Ismail, BA BED SET GHS, Kagan Wala, Peshawar.	480/1000/79.	8.10.1985.
7.	Khalilur Rehman, BSc BED SET G.H.S., Barora.	780/1200/85.	6.11.1985.
8.	Shoukat Ali, BSc BED SET GHS, Badreshi, Nowshera.	566/1000/85.	21.10.1986.
9.	Gul Zaman, MSc BED SET GHS, Rohi Barmol, Mardan.	480/1000/85.	26.10.1986.
10.	Lal Mohammad, MA BED SET G.H.S.No.1, Peshawar City.	467/1000/80.	26.10.1986.
11.	Qamar Ali, BSc BED S.E.T. GHS, Shah Mansoor, Swabi.	602/1000/83-84.	26.10.1986.
12.	Shamsur Rehman, BA MA Edu: SET GHS, Jhanda (Swabi).	77%/83.	27.10.1986.
13.	Syed Badshah, BA BED S.E.T. G.H.S., Maini, Swabi.	454/1000/79.	1.11.1986.
14.	Abdul Malik, MA MED S.E.T. G.H.S., Jehangira (Swabi).	78%/83.	1.11.1986.
15.	Rehman Ali, MA BED S.E.T. GHS, Kharr Abad,	835/1200/80.	1.11.1986.
16.	Ibrahim Khan, BA BED SET GMS, Pahari Rati Khet.	1598/3000/80.	1.11.1986.

S.No.	Name of SFT/Address	Marks Obtained	Remarks
"2--"			
(6)			
<u>CONT-II/Pesh: Mardan</u>			
15	Mohammad Javed, M. Sc B. Ed, SFT 829/1000/83-84	GHS Bajra, Swabi	6-11-1986
16	Mohammad Amin MA BEd SFT 435/1000/80	GHS Jehangira, Road, Nowshera	8-11-86
17	Mohammad Ismail, MA BEd SFT 440/1000/79	GHS Marghuz Swabi	15-11-86
18	Gul. Zarif, MA BEd, SFT 432/1000/79	GHS Shaidu Nowshera	15-11-1986
19	Hamid Ali, B. Sc. BEd. 747/1200/36	GHS Manki (Swabi)	26-01-1987
20	Abdur Rashid, B.A BEd SFT 432/1000/80	GHS Malogi Peshawar	27-1-1987
21	Liaqat A. Li, BSc BEd SFT 512/1200/86	GHS Dag Bwola Nowshera	28-1-1987
22	Hazrat, B.A BEd SFT 491/1000/80	GHS No.2 Nowshera Cantt.	29-1-1987
23	Mohammad Aslam, BSc BEd SFT 777/1000/86	GHS Murghuz Swabi	31-1-1987
24	Zainullah, MA BEd SFT 543/1000/80	GHS Khawari, Nowshera	1.2.1987
25	Misal Khan, BA B. Ed SFT 482/1000/80	GHS Mali Khel Bala Nowshera	1.2.1987
26	Mohammad Inam, B.A BEd SFT 493/1000/80	GHS Pishungari, Nowshera	8-2-1987
27	Abdur Raziq, B.A B. Ed SFT 499/1000/77	GHS Saleem Khan (Swabi)	22-2-87
28	Ghufuranullah MSc B. Ed SFT 495/1000/85-86.	GHS No.1, Nowshera Cantt.	22.3.1987
29	Fahim Shah, BA BEd (Indst. Arts Edu.) SET Tech: 429/1000/85.	GHS Marghuz, Swabi.	1.4.1987
30	Hidayatul Haq, BSc BEd SET Tech) GHS, Agra Charasadda.	506/1000/85-86.	15.4.1987
31	Lal Hasnat, BA BEd SET GHS, Sarband, Peshawar.	472/1000/80.	15.4.1987
32	Hanifullah, BSc BEd SET GHS, Utla, Swabi.	564/1000/85-86.	15.4.1987
33	Jehan Mohammad, BSc BEd SET GHS Ziarat Kaka Sahio, (Nowshera).	480/1000/85-86.	15.4.1987
34	Mohammad Rafiq, BA BEd SET GHS, Thand Koi,	460/1000/81.	16.4.1987
35	Zarsher Khan, MSc BEd SET GHS, Sarband, Peshawar,	537/1000/85-86.	16.4.1987

103.	Ghulam Rabbani, BA MEd, GMS, Khazan Gul Kot, NWA.	665/1200/81-82.	16.11.1986
104.	Abdul Majid, BA BED, SET GMS, Dand Ahmad Khel, Bannu.	430/1000/77.	15.11.1982.
105.	Mohammad Ramzan, BA BED, SET GHS, Naddi Kulchi, D.I. Khan.	657/1200/79.	16.12.1982.
106.	Ihsanullah, SET Tech: GHS No. 2, D.I. Khan.	1367/2000/88.	19.12.1982.
107.	Malik Zulfiqar, SET Tech: GHSS, Bannu.	1381/2000/88.	17.8.1985.
107A.	Khuda Baksh, BA BED, GHS, Wanda	447/1000/79.	17.9.1985.
108.	Mohammad Noor Khan, BA BED, Madat. SET GHS, Chuhar Khel, Bannu.	473/1000/80.	18.9.1985.
109.	Zakria Khan, BSc. BED SET, GHS, Nari Panas.	429/1000/85.	19.9.1985.
110.	Aamir Nawaz, BA BED, SET GHS, Khan Khel Pacca.	416/1000/85.	29.9.1985.
111.	Hakim Khan, BSc. B. Ed, SET GHS, Darraki, D.I. Khan.	476/1000/84.	1.10.1985.
112.	Sifatullah, BSc. MEd, SET, GHS, Ismail Khel.	712/1200/83-84.	9.10.1985.
113.	Reayat Khan, BSc BED SET GHS, Maigin Kohat.	746/1200/85.	21.10.1985.
114.	S. Wais Hussain, MA MEd, SET GHS, Lodni Khel, Kohat.	685/1000/82.	5.12.1985.
115.	Mohammad Rauf Khan, MSc BED SET GHS, Kiri Haider, Tank.	771/1200/84-85.	8.12.1985.
116.	Abdus Salam, BSc, BED. SET GHS, Abdul Khel, D.I. Khan.	778/1200/85.	8.12.1985.
117.	Abdullah Shah, MEd, SET GHS, Kohi, Kohat.	719/83.	4.5.1986.
118.	Usman Ali Khan, BSc MEd, SET GHS, Dosali, N.W.A.	659/1200/85.	5.5.1986.
119.	Samiullah Khan, BSc BED SET GHS No. 2, Kulachi.	688/1200/85.	5.5.1986.
120.	Juma Gul Shah, MSc BED, SET GHS, Mandan, Bannu.	649/1200/85.	19.6.1986.
121.	Kalimullah, BSc BED SET GHS, Dhakki, D.I. Khan.	663/1200/85.	9.10.1986.
122.	Ziaud Din, BA BED, SET GMS, Tora Warri, Haagu.	559/1000/80.	14.10.1986.
123.	Ali Mohammad, MA BED, SET GHS, Barh, Kohat.	578/1000/80.	15.10.1986.
124.	Chinar Shah, BA BED, SET GHS, Naryab, Kohat.	545/1000/80-81.	22.10.1986.
125.	Hamid Raza, BA BED, SET GHS, Landi Kachai, Kohat.	424/1000/84.	22.10.1986.

8

- 126. Hukam Khan, MA BEd, SET GHS,
Mir Khan Khel, Karak. 460/1000/80. 23.10.1986.
- 127. Taj Raees Khan, MA BEd, SET
GHS, Malgin, Kohat. 431/1000/80. 24.10.1986.
- 128. Abdur Riaz, BA BEd, SET GHS,
Dallan, Kohat. 431/1000/80. 25.10.1986.
- 129. Mohammad Noor, BSc BEd SET
GHS, Khadizai, Kohat. 645/1000/85. 29.10.1986.
- 130. Mohammad Ayub, MA MEd, SET
GHS, Kaniguram, S.W.A. 832/1200/82-83. 1.11.1986.
- 131. Khairullah Khattak, BSc MEd
SET GHS, Doaba, Kohat. 71%/ 1.11.1986.
- 132. Farid Nawaz Khan, MA BEd, SET
GHS, Nurar, Bannu. 534/1000/80. 2.11.1986.
- 133. Mohammad Shuaib, MA BEd, SET
GHS, Togh Serai. 534/1000/80. 4.11.1986.
- 134. Haider Ali, MA BEd, SET
G.H.S. Nayab, Kohat. 426/1000/80. 5.11.1986.
- 135. Khalid Naeem Khan, BA BEd, SET
GHS, Landi Baluch, FR-D.I.Khan. 455/1000/85. 11.11.1986.
- 136. Mohammad Askar, BSc BEd SET,
GHS Khadezai, Kohat. 516/1000/84. 7.12.1986.
- 137. Muzamil Khan, MA BEd, SET
GHS, Chamba Gul, Kohat. 779/1200/81. 16.12.1986.
- 138. Faridullah Khan, MSc BEd SET,
GHS Lachi, Kohat. 511/1000/86. 5.1.1987.
- 139. Mohammad Ismail Khan, BA BEd,
SET GHS, Shamooni, Khattak, Bannu. 558/1000/79-80. 13.1.1987.
- 140. Mohammad Saeed, MA BEd, SET
GHS, Garra Muhabat, D.I.Khan. 1735/3000/80. 15.1.1987.
- 141. Nek Nawaz, BSc BEd, SET GHS,
Landi Kachai, Kohat. 786/1200/86. 24.1.1987.
- 142. Falak Naz Khan, MSc BEd SET,
GHS, Lalozai, Bannu. 774/1200/85-86. 26.1.1987.
- 143. Mohammad Azizullah Khan, MSc BEd
SET GHS, Kiri Haider, Tank. 776/1200/86. 28.1.1987.
- 144. Abdul Jabbar Khan, MSc BEd,
SET GHS, Bannu. 795/1200/86. 1.2.1987.
- 145. Ahmad Khan, BA BEd, SET GHS,
Khal Baharos, FR-D.I.Khan. 358/800/81. 7.2.1987.
- 146. Gulab Khan, MA BEd, SET GHS,
Nazar Jan, Bhattani. 528/1000/81. 8.2.1987.
- 147. Farman Ali, MEd, SET GHS,
Thali, Kohat. 696/1200/85. 11.2.1987.
- 148. Abdur Rehman Shah, MSc BEd SET,
GHS No. 1, Tank. 795/1200/86. 17.2.1987.

(9)

11. Ghulam Jilani, BA BEd SET G.H.S., Seo.	425/1000/85.	23.10.1987.
12. Raza-ur-Rehman, MA MEd SET G.H.S., Sirikote.	78%/86.	24.10.1987.
13. Mohammad Arif, MA MEd SET G.H.S., Tofkian.	76%/87.	25.10.1987.
14. Riaz-ur-Rehman, BA BEd SET G.H.S., Tofkian.	616/1100/85.	25.10.1987.
15. Jehanzeb Khao, BA BEd GHS, Dheri, Nagan Chian.	559/1100/84.	26.10.1987.
16. Mohammad Bashir Khan, SET G.H.S., Jhangra, MA MEd.	76%/86.	27.10.1987.
17. Fazalur Rehman, MA MEd G.H.S. No.4, A. Abad.	400/1000/84.	5.12.1987.

Notes.

1. Their intersee seniority will be determined with effect from the date of their approval made by the Departmental Selection Committee according to the marks obtained in the B.Ed, Examination in the year concerned.
2. They are liable to be Governed under the West Pakistan Education Subordinate Rules, 1962.
3. Their Pay Scales are subject to the revision by the Government from time to time.
4. The teacher concerned may be informed by the Head of Institution concerned if he has been transferred from his school.
5. The marks obtained and year of B.Ed/Domicile of the above SETs may be checked and confirmed before placing them in graded pay.
6. Any discrepancy noted by you may be brought in the notice of the undersigned for rectification.
7. The above SETs are advised to deposit S/Board Fee in the Government Treasury and Entry to this effect should be made in their Service Books before the preparation of their arrears bills.
8. The names of those SETs who are working on fixed pay may be sent to this office immediately.

(SYED SARWAR SHAH)
Deputy Director (Schools),
For/D.E. (SS) NWFP, Peshawar.

Approval 275

75

(10)

Endst: no.

2334-2834

A-14/SET/Approval.

Dt/Pesh: the 7/1/89.

Copy forwarded for information and n/action to the:-

1. Director of Education (PATA) N.W.F.P., Peshawar.
- 2-6. Divisional Director of Education (Schools) in N.W.F.P.
- 7-19. All the District Edu: Officer (Male) in N.W.F.P.
20. Accountant General, N.W.F.P., Peshawar.
- 21-31. All the District accounts Officers in N.W.F.P.
- 32-37. All the Agency Inspectors of Schools in FATA.
38. Agency accounts Officers concerned.
- 39-258. All the Head of Institutions concerned.
- 259-478. Officials concerned.
479. P.A. to Director of Education (Schools) N.W.F.P., Peshawar.

Amal

Deputy Director (Schools),
For/D.E. (S) NWFP, Peshawar.

Farid Khan
1:1:1989.



GOVERNMENT OF NWFP
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Peshawar, Dated: 27-03-2010

NOTIFICATION

NO.SO(PE)2-6/E&SE/DPCMEETING/2010: Consequent upon the recommendations of the Departmental Promotion Committee, the competent authority is pleased to promote the following Two hundred and Forty Two (242) Male SETs (BS-16) to the post of Headmaster (BS-17) on regular basis with immediate effect:

S.No.	Name & Designation	Proposed Place of Posting	Remarks
1	Habib ur Rahman SET GHS Wana NWA	Services placed at the disposal of DE FATA	
2	Yar Muhammad SET GHS Jan Khar Kalay Khyber Agency	Services placed at the disposal of DE FATA	
3	Sadiq Jan SET AEO C/O EDO Dir Upper	H/M (BPS-17) GHS Quland Dir Upper	Against Vacant Post
4	Said Muhammad SET GHS Raghagar Bajour Agency	Services placed at the disposal of DE FATA	
5	Said Habib SET GMS Tang. Charmang Bajour Agency	Services placed at the disposal of DE FATA	
6	Muhammad Afzal SET GCMHS Jadar Mansehra	H/M (BPS-17) GHS Kolti Bala Mansehra	Against Vacant Post
7	Muhammad Shafiq SET GHS Iako Mansehra	H/M (BPS-17) GHS Ghanool Mansehra	Against Vacant Post
8	Saadat Shah SET GHS No 1 Havelan Abbottad	H/M (BPS-17) GHS Choi Haripur	Against Vacant Post
9	Muhammad Riaz SET GMS Talpos Mansehra	H/M (BPS-17) GHS Mohandri Mansehra	Against Vacant Post
10	Zarif Khan SET GHS Ghazi Hamlet Haripur	H/M (BPS-17) GHS Nal Abbottabad	Against Vacant Post
11	Hafiz ur Rahman SET GHS Shamdarra Mansehra	H/M (BPS-17), GHS Salabat Mansehra	Against Vacant Post
12	Waqif Israr SET GMS Shawoo Shangla	H/M (BPS-17), GHS Shawoo Shangla	Against Vacant Post
13	Bakht Malook SET GHS Dheri Jolagram Malakand	H/M (BPS-17), GHS Inzargi Malakand	Against Vacant Post
14	Muhammad Naeem SET GCMHS T. mergara Dir Lower	H/M (BPS-17) GHS Chamta Dir Lower	Against Vacant Post
15	Ghulam Qadir AEO Kurram Agency	Services placed at the disposal of DE FATA	
16	Obaid ur Rahman SET GMS Babar	H/M (BPS-17), GHS Hisar Buner	Against Vacant Post
17	Said Qayyum SET GHS Dehrai Alpuri Shangla	H/M (BPS-17), GHS Dehrai Alpuri Shangla	Against Vacant Post
18	Muhammad Arif SET GHS Sara, Saleh Haripur	H/M (BPS-17), GHS Koori Haripur.	Against Vacant Post
19	Essa Khan SET GHSS No 4 Dir Khan	H/M (BPS-17) GHS Pota Dir Khan	Against Vacant Post
20	Ghulam Siddique SET GHSS Dome Bannu	H/M (BPS-17) GHS Kotka Biliawar Khan Bannu	Against Vacant Post
21	Johar Khan SET GHS Kanigurram SWA	Services placed at the disposal of Director Education FATA.	
22	Naqeebullah Khan SET GHS Kotka Gul Ikram F.R Bannu	Services placed at the disposal of Director Education FATA.	
23	Azizullah Khan SET	Services placed at the disposal of	

ATTESTED

107	Khan Wali SETGHS Nano SWA	Services placed at the disposal of DE FATA	
108	Dur Jan SETGHS Miran Shah NWA	Services placed at the disposal of DE FATA	
109	Sami ur Rahman SET GHS Behola Charsadda	H/M (BPS-17) GHS Khawari Nowshera	Against Vacant Post
110	Khuda Nigah SET GHS Zondrangram Chitral	H/M (BPS-17) GHS Zondrangram Chitral	Against Vacant Post
111	Muhammad Jadir Shah SET GHS Darosh Chitral	H/M (BPS-17), GHS, Susoom, Chitral	Against Vacant Post
112	Hidayat Khan SET GHS Dardyal Swat	H/M (BPS-17) GHS Beha Swat	Against Vacant Post
113	Zia ud Din SET GHS Miha Khel Karak	H/M (BPS-17) GHS Ghunda Shamshaki Karak	Against Vacant Post
114	Obaidullah SET GHS Qulangi Malakand	H/M (BPS-17) GHS Qulangi Malakand	Against Vacant Post
115	Lal Sattar SET GMS Latamber Karak	H/M (BPS-17) GHS Esak Khumari Karak	Against Vacant Post
116	Ali Muhammad SET GHS Muslim Abad Kohat	H/M (BPS-17) GHS Shadi Khel Kohat	Against Vacant Post
117	Muhammad Razaq SET GHS Khosro Malakand	H/M (BPS-17) GHS Khanori Malakand	Against Vacant Post
118	Chinar Shah SET GHS Kairi Dhand Karak	H/M (BPS-17) GHS Shaou Khel Hangu	Against Vacant Post
119	Syed Arab Shah SET GHS Chakar Kot Kohat.	H/M (BPS-17) GHS Usterzai Bala. Kohat	Against Vacant Post
120	Razimand SET ADO O/O the ADO Shangla	H/M (BPS-17) GCMHS Alpori Shangla	Against Vacant Post
121	Mir Kazim Khan SET GMS Kuril Sharif Karak	H/M (BPS-17) GHS Dabli Lawaghar Karak	Against Vacant Post
122	Hamid Raza SET GHS Landi Kachi Kohat	H/M (BPS-17) GHS Marai Payan Kohat	Against Vacant Post
123	Hakam Khan SET GHS Ghund Mir Khan Khel Karak	H/M (BPS-17) GHS Parshai Kohat	Against Vacant Post
124	Raz Muhammad SET GHS Nahaq Peshawar	H/M (BPS-17) GHS Maira Urmar Payan Peshawar	Against Vacant Post
125	Shamshad SET GHS No 1 Charsadda	H/M (BPS-17) GHS Kharakai Charsadda	Against Vacant Post
126	Zaheer ud Din SET GHS Marakro Peshawar	H/M (BPS-17) GHS Mashogagar Peshawar	Against Vacant Post
127	Muhammad Azam SET GMS Nasapa Peshawar	H/M (BPS-17) GHS Bela Baramad Khel Peshawar	Against Vacant Post
128	Sahib Noor SET GMS Kaidan Mardan	H/M (BPS-17) GHS Tangora Buner	Against Vacant Post
129	Njaz Muhammad SET GHS Bahara Charsadda	H/M (BPS-17) GHS Pahari Kati Khel Nowshera	Against Vacant Post
130	Muhammad Noor SET GHS Gand Khan Khel Lakk	H/M (BPS-17) GHS Jabbar Kohat	Against Vacant Post
131	Ghandai Khan SET GHS Pishtakhara Payan Peshawar	H/M (BPS-17) GHS Ahmad Khel Peshawar	Against Vacant Post
132	Abdul Malik SET GHS Yar Hussain Swabi	H/M (BPS-17) GHS Beka Swabi	Against Vacant Post
133	Ibrahim Khan SET GMS Garh Daulazai Mardan	H/M (BPS-17) GHS Gaja Swabi	Against Vacant Post
134	Akhtar Zaman SET GHS No.3 Bannu City	H/M (BPS-17) GHS Jani Khel Barnu	Against Vacant Post
135	Rahman Ali SET GHS Khair Abad Mardan	H/M (BPS-17) GHS Naranji Swabi	Against Vacant Post
136	Khalirullah Khan SET GCMHS No.4 Peshawar Cantt	H/M (BPS-17) GHS Mami Khel Karak	Against Vacant Post
137	Farid M. Yez SET	H/M (BPS-17) GHS K. Masum Kohat	Against Vacant Post

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138	Muhammad Shoalb SET GHSS Biltang Kohat	H/M (BPS-17) GHS Ghorizai Kohat	Against Vacant Post
139	Fazal Muhammad SET GMS Purana Hot. Mardan	H/M (BPS-17) GHS Marhatti Banda i Nowshera	Against Vacant Post
140	Iqbal Hussain SET GHS Jabba Nowshera	H/M (BPS-17) GHS Haryan Swabi	Against Vacant Post
141	Abdul Aziz SET GHS Gujarat Mardan	H/M (BPS-17) GHS Cheena Buner	Against Vacant Post
142	Muhammad Ibrahim SET GHS Kharki Dheri Malakand	H/M (BPS-17) GHS Kot Malakand	Against Vacant Post
143	Abdul Sattar SET GCMHS Abbottabad	H/M (BPS-17) GHS Satoora Abbottabad	Against Vacant Post
144	Muhammad Daud SET GMS Badar Sardge No. 2 SWA	Services placed at the disposal of DE FATA	
145	Mushtaq ur Rahman SET GHS Badwan Dir	H/M (BPS-17) GHS Miskini Dir Lower	Against Vacant Post
146	Aurangzeb SET GHSS Dara Pezu Lakki Marwat.	H/M (BPS-17) GHS G.otti D.I.Khan.	Against Vacant Post
147	Saeedullah SET GMS Lsheri Dir Upper	H/M (BPS-17) GHS Bibywar Dir Upper	Against Vacant Post
148	Muhammad Nazeer SET GHSS Khan Pur Dir Lower	H/M (BPS-17) GHS Beyar Dir Upper	Against Vacant Post
149	Ahmad Khalil SET GMS Bamfoda: Dir	H/M (BPS-17) GHS Kalkot Dir Upper	Against Vacant Post
150	Shahir ud Din SET GHS Ghawar Kili Malakand	H/M (BPS-17) GHS Miandam Swat	Against Vacant Post
151	Muhammad Younas SET ADO O.O EDO Battagram	H/M (BPS-17) GHS Biari Battagram	Against Vacant Post
152	Hidayat ul Haq SET GHS Satt Abad Charsadda	H/M (BPS-17) GHS Adamzai Nowshera	Against Vacant Post
153	Muhammad Askar SET GHS Lodhi Khe: Hangu	H/M (BPS-17) GHS Lodhi Khe: Hangu	Against Vacant Post
154	Mohabat Khan SET GHS No.2 Jamrud Khyber Agency	Services placed at the disposal of DE FATA	
155	Yousaf Hussain SET GHS Shalozan Kurram Agency	Services placed at the disposal of DE FATA	
156	Syad Maqbool Shah SET GHS No. 1 Jamrud Khyber Agency	Services placed at the disposa. of DE FATA	
157	Ifthar ud Din SET GHS Chitral	H/M (BPS-17) GHS Kessu Chitral	Against Vacant Post
158	Gulzar Bahadar SET GHS Kunda Swabi	H/M (BPS-17) GHS Sheikh Dheri Swabi	Against Vacant Post
159	Shams ul Haq SET GHS Kaghan Mansehra	H/M (BPS-17) GHS Nawaz Abad Mansehra	Against Vacant Post
160	Sadar Muhammad SET GMS Danish Koor Mohmand Agency	Services placed at the disposa. of DE FATA	
161	Amanullah Khan SET GHS De: Mela Karak	H/M (BPS-17) GHS Warghar Banda Karak	Against Vacant Post
162	Mahboob Ahmad SET GHSS No. 1 Haripur	H/M (BPS-17) GHS Kag Haripur	Against Vacant Post
163	Hirkeel ur Rahman SET GHSS Nawan Sheher Abbottabad	H/M (BPS-17) GHS Nareela Abbottabad	Against Vacant Post
164	Juma Khan SET GHSS Sher Pur Mansehra	H/M (BPS-17) GHS Bai Bohal Mansehra	Against Vacant Pbs
165	Ahmad Khan SET GHS Newaz Abad Mansehra	H/M (BPS-17) GHS Pيران Mansehra	Against Vacant Post
166	Abdul Qadir SET GHS Chuna: Abbottabad	H/M (BPS-17) GHS Khairyan Haripur	Against Vacant Post
167	Sanaullah Khan SET GMS Khutti D.I.Khan	H/M (BPS-17) GHS Gandhi Umar Khan D.I.Khan	Against Vacant Post

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15	Munawar Jan, SET GHSS, Bilitang Kohat	H/M (BPS-17), GHS, Barh Kohat	Against Vacant Post
16	Haq Nawaz, SET GHS, Aloori Haripur	H/M (BPS-17), GHS, Pharaia Haripur	Against Vacant Post
17	Sami Ullah SET GHSS Dara Pezu Lakki Marwat.	H/M (BPS-17) GHS Kaka Khel Lakki Marwat.	Against Vacant Post
18	Misal Khan, SET GMS Harat Khel Lakki	H/M (BPS-17), GHS, Keri Haider	Against Vacant Post
19	Abdur Rashid, SET GHS, Ghumawan, Haripur	H/M (BPS-17), GHS, Dartian Haripur	Against Vacant Post
20	Shah Muhammad, SET GHSS, Jhang Khe Lakki	H/M (BPS-17), GHS, Bargi Lakki	Against Vacant Post

3. On their promotion the officers will be on probation for a period of one (1) year in terms of section 6(2) of NWFP Civil Servant Act 1973 read with Rule 15(1) of the NWFP Civil Servant (Appointment, Promotion and Transfer) Rules 1989.


SECRETARY TO GOVT OF NWFP
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Endst; of even no. & date:

Copy is forwarded to:-

- 1) Secretary to Govt of NWFP, Establishment Department, Peshawar.
- 2) Special Secretary (Regulation), Establishment Department, Govt of NWFP Peshawar.
- 3) Secretary to Govt. of NWFP, Finance Department, Peshawar.
- 4) Secretary to Chief Minister NWFP.
- 5) PS to Chief Secretary NWFP.
- 6) All Directors in Elementary & Secondary Education Department NWFP.
- 7) Executive District Officers Elementary & Secondary Education concerned.
- 8) The Accountant General NWFP.
- 9) All District Accounts Officers / Agency Accounts Officers concerned
- 10) PS to Minister for Elementary & Secondary Department NWFP.
- 11) PS to Secretary / Special Secretary / Additional Secretary E&S Edu: Deptt Govt of NWFP.
- 12) PA to Deputy Secretary (Admn) Elementary & Secondary Edu: Department Govt of NWFP.
- 13) Officers concerned
- 14) Master file

ATTESTED


(ARIF JAMIL)
SECTION OFFICER (PRIMARY)

SR No	Name of Officers with Qualification	Date of Birth	Domestic	Date of 1st Entry in Edu. Deptt.	Reg Date	Grade	Method	Designation/Place of Posting	Remarks
210	Muhammad Saad MA BEd	11/10/1958	Swedia	14/11/1972	18/09/2009	17	By Promotion	HM GHS Abthal Lahr	SO/PE/2-6/E&S/DPC Meeting/09 dated 18/09/2009
211	Muhammad Saad MA BEd	11/10/1958	Swedia	26/03/1974	18/09/2009	17	By Promotion	HM GHS Zaid Ahmad Cherasida	SO/PE/2-6/E&S/DPC Meeting/09 dated 18/09/2009
212	Arak Syah MA BEd	11/01/1960	Swedia	11/04/1974	18/09/2009	17	By Promotion	HM GHS Ghani Mardian	SO/PE/2-6/E&S/DPC Meeting/09 dated 18/09/2009
213	Anwar Saad BSc BEd	11/04/1957	Swedia	2/11/1983	18/09/2009	17	By Promotion	HM GHS U a Saad	SO/PE/2-6/E&S/DPC Meeting/09 dated 18/09/2009
214	Padar Khan MA BEd	12/27/1951	Swedia	18/03/2001	18/09/2009	17	By Promotion	HM GHS N I Ya Hassan	SO/PE/2-6/E&S/DPC Meeting/09 dated 18/09/2009
215	Fazl Akbar MA BEd	12/27/1951	Swedia	18/03/2001	18/09/2009	17	By Promotion	HM GHS Darul Taq	SO/PE/2-6/E&S/DPC Meeting/09 dated 18/09/2009
216	Muhammad Qasim Khan BSc MEd	22/05/1959	11 Khan	29/11/1979	18/09/2009	17	By Promotion	HM GHS Anil Bani Shah Bannu	SO/PE/2-6/E&S/DPC Meeting/09 dated 18/09/2009
217	Waj Aziz MA BEd	31/05/1955	Swedia	10/11/1984	18/09/2009	17	By Promotion	HM GHS Ghazal Bannu	SO/PE/2-6/E&S/DPC Meeting/09 dated 18/09/2009
218	Khan Hassan MA BEd	15/02/1955	Swedia	03/03/1982	18/09/2009	17	By Promotion	HM GHS G a Saad	SO/PE/2-6/E&S/DPC Meeting/09 dated 18/09/2009
219	Muhammad MA BEd	10/01/1951	Swedia	12/11/1983	18/09/2009	17	By Promotion	HM B-17 service placed at the disposal of DE/FAIA	SO/PE/2-6/E&S/DPC Meeting/09 dated 20/01/2010
220	Ahmad Khan MA BEd	11/01/1954	11 Khan	27/02/1984	20/01/2010	17	By Promotion	HM GHS Saad Ghani Bannu	SO/PE/2-6/E&S/DPC Meeting/09 dated 20/01/2010
221	Zahid Khan BSc BEd	07/02/1958	11 Khan	27/02/1984	20/01/2010	17	By Promotion	HM GHS Maqsood Mardian Lahr	SO/PE/2-6/E&S/DPC Meeting/09 dated 20/01/2010
222	Muhammad Saad MA BEd	01/11/1958	Swedia	21/05/1972	20/01/2010	17	By Promotion	HM GHS N I Ya Hassan	SO/PE/2-6/E&S/DPC Meeting/09 dated 20/01/2010
223	Muhammad Saad MA BEd	01/11/1958	Swedia	21/05/1972	20/01/2010	17	By Promotion	HM GHS N I Ya Hassan	SO/PE/2-6/E&S/DPC Meeting/09 dated 20/01/2010
224	Muhammad Saad MA BEd	01/11/1958	Swedia	21/05/1972	20/01/2010	17	By Promotion	HM GHS N I Ya Hassan	SO/PE/2-6/E&S/DPC Meeting/09 dated 20/01/2010

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Name of Officers with Qualification	D.O.B	Grade	Date of Ist. Entry in Edu. Dept.	Reg. Date	Grade	Method	Present place of Posting	Remarks
Muhammad Zahid SO Major	12/04/75	17	12/06/2003	12/01/2010	17	Direct	SS-FATA	SO(S) 2/2009 (Male) dated 12/04/2010 (Ment) 01/2009
Muhammad Zahid SO Major	12/04/75	17	12/06/2003	12/01/2010	17	Direct	SS-FATA	SO(S) 2/2009 (Male) dated 12/04/2010 (Ment) 01/2009
Yasir Khan SO Major	15/04/79	17	12/06/2003	12/01/2010	17	Direct	SS-FATA	SO(S) 2/2009 (Male) dated 12/04/2010 (Ment) 01/2009
Muhammad Nawaz Khan SO Major	21/04/75	17	12/06/2003	12/01/2010	17	Direct	SS-FATA	SO(S) 2/2009 (Male) dated 12/04/2010 (Ment) 01/2009
Shahid Shah SO Major	13/02/83	17	12/06/2003	12/01/2010	17	Direct	SS-FATA	SO(S) 2/2009 (Male) dated 12/04/2010 (Ment) 01/2009
U. M. Khan SO Major	09/04/82	17	12/06/2003	12/01/2010	17	Direct	SS-FATA	SO(S) 2/2009 (Male) dated 12/04/2010 (Ment) 01/2009
Muhammad Faraz Khan SO Major	18/10/84	17	12/06/2003	12/01/2010	17	Direct	SS-FATA	SO(S) 2/2009 (Male) dated 12/04/2010 (Ment) 01/2009
Chiragh Khan SO Major	02/02/84	17	12/06/2003	12/01/2010	17	Direct	SS-FATA	SO(S) 2/2009 (Male) dated 12/04/2010 (Ment) 01/2009
Muhammad Khan SO Major	14/03/84	17	12/06/2003	12/01/2010	17	Direct	SS-FATA	SO(S) 2/2009 (Male) dated 12/04/2010 (Ment) 01/2009
Muhammad Sohail SO Major	20/03/84	17	12/06/2003	12/01/2010	17	Direct	SS-FATA	SO(S) 2/2009 (Male) dated 12/04/2010 (Ment) 01/2009
Muhammad Sohail SO Major	08/03/84	17	12/06/2003	12/01/2010	17	Direct	SS-FATA	SO(S) 2/2009 (Male) dated 12/04/2010 (Ment) 01/2009
Muhammad Sohail SO Major	08/03/84	17	12/06/2003	12/01/2010	17	Direct	SS-FATA	SO(S) 2/2009 (Male) dated 12/04/2010 (Ment) 01/2009

ATTESTED

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Sr.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st Entry in Edu. Deptt.	Reg. Date	Grade	Method	Designation/Place of Posting	Remarks
126	Muhammadiyah S/O Khan Zada SS History Cant Crics	09.03.83	Swat	01.09.2006	06.01.2011	17	D/Selectee	SS GHSS Balyal Shanga	SO(SM) ES/SED/J-2/2010/SS-His cant. Crics(Male) dated 06.01.2010(Merit 01/2009)
127	Muhammad Sharif S/O Gul Janan SS Physics	10.03.83	Lakki Marwat	25.02.2011	25.02.2011	17	D/Selectee	SS GHSS Balara Barer	SO(SM) ES/SED/J-2/2011/SS Physics(Male) dated 25.02.2011(Merit 01/2009)
128	Gulzar Khan S/O Alias Khan SS Botany	05.09.83	Peshawar	16.08.2010	16.08.2010	17	D/Selectee	SS GHSS Paha Daher Mandan	SO(S)J-2/2004(Male) dated 16.08.2010(Merit 01/2009)
129	Isam U/Din S/O Shahab ud Din SS Islamiyat	16.04.71	Dir	01.07.1997	23.12.2010	17	D/Selectee	SS GHSS Baitara Kohistan	SO(SM) ES/SED/J-2/2010/SS-Islamiyat(Male) dated 23.12.2010(Merit 01/2009)
130	Kisar Ahmad S/O Feoz Din SS Islamiyat	10.04.75	Haripur	18.12.1994	23.12.2010	17	D/Selectee	SS GHSS Dakhand Maraspha	SO(SM) ES/SED/J-2/2010/SS-Islamiyat(Male) dated 23.12.2010(Merit 01/2009)
131	Tasawar Gul S/O Muhammad Akbar SS Islamiyat	14.01.78	Haripur	23.12.2010	23.12.2010	17	D/Selectee	SS GHSS Jehangir Karak	SO(S) ES/SED/J-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
132	Mudren Zaki S/O Zaki Ullah Jan SS Economics	02.01.67	Charsadda	01.11.2005	12.01.2010	17	D/Selectee	SS GHSS Ullanzai Charsadda	SO(S) ES/SED/J-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
133	Asadullah S/O Iqbal Buland SS Maths	05.12.68	Peshawar	28.07.1990	12.01.2010	17	D/Selectee	SS GHSS Dosehra Charsadda	SO(SM) ES/SED/J-2/2010/SS-His cum- Crics(Male) dated 06.01.2010(Merit 01/2009)
134	Shafiq Ullah Khan S/O Gudam Harib Khan SS His Cum Crics	19.06.75	Baran	06.01.2011	06.01.2011	17	D/Selectee	SS GHSS Dhakki O Khan	SO(SM) ES/SED/J-2/2011/SS Physics(Male) dated 25.02.2011(Merit 01/2009)
135	Aamir Saif S/O Muhammad Hassan SS Physics	15.12.80	Mardan	25.02.2011	25.02.2011	17	D/Selectee	SS GHSS Barawal Bandi Dir(S)	SO(S) ES/SED/J-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
136	Sakia Farwan S/O Umar Muhammad SS Islamiyat	12.01.81	Dir	12.01.2010	12.01.2010	17	D/Selectee	SS GHSS Mann Buzgole Dir(S)	SO(SM) ES/SED/J-2/2011/SS Islamiyat(Male) dated 12.01.2010(Merit 01/2009)

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No	Name of Officers with Qualification	D/O Birth	Domestic	Date of 1st Entry in Force	Reg. Date	Grade	Method	Designation/Place of Posting	Remarks
39	Bayu Rahmat SS Physics		Abroad		25.02.2011	17	Dis/Selectee	PIIE Pasirharau	17(S/M)E&SED/220117/SS (Males) date: 25.02.2011 (Ment 2009)
40	Habib ur Rahman SS Islampal	16.12.70	Uluh Marau		23.12.2010	17	Dis/Selectee	SS GHSS Padang Ment	17(S/M) E&SED/22010/SS (Males) date: 23.12.2010 (Ment 2009)
41	Shaukat Ullah S/O Aung Khan SS History Cum Civics	02.04.71	Banau	03.12.11	06.01.2011	17	Dis/Selectee	SS GHSS Ranau III	17(S/M)E&SED/220117/SS Physics(Male) date: 06.01.2010(Ment 2009)
42	Muhammad Asghar S/O Shafiq Rahman SS Physics	15.01.71	Sekab	24.02.11	29.02.2011	17	Dis/Selectee	SS GHSS Kabori Hg Kubai	17(S/M)E&SED/220117/SS Physics(Male) date: 25.02.2011 (Ment 2009)
43	Farman Ullah Khan S/O Ashraf Khan SS Botany	12.07.1976	Banau	16.06.11	16.08.2010	17	Dis/Selectee	SS GHSS Maharaja	17(S/M) E&SED/22010/SS (Males) date: 16.08.2010 (Ment 2009)
44	Khalid ul Akbar S/O Muhammad Ismail SS Islampal	01.01.74	Banau		23.12.2010	17	Dis/Selectee	SS GHSS Agrio 3a	17(S/M) E&SED/22010/SS (Males) date: 23.12.2010 (Ment 2009)
45	Hayal Muhammad S/O Sahib Wali SS Islampal	09.02.74	Dr		23.12.2010	17	Dis/Selectee	SS GHSS Ladang Dn	17(S/M) E&SED/22010/SS (Males) date: 23.12.2010 (Ment 2009)
46	Javed Khan S/O Muhammad Khan SS History Cum Civics	24.05.74	Pasirharau		06.01.2011	17	Dis/Selectee	SS GHSS Adzani	17(S/M) E&SED/22010/SS (Males) date: 06.01.2010 (Ment 2009)
47	Salah ud Din S/O Muhammad Ashraf Khan SS His Cum Civics	17.01.77	Banau		06.01.2011	17	Dis/Selectee	SS GHSS Masti	17(S/M) E&SED/22010/SS (Males) date: 06.01.2010 (Ment 2009)
48	Irfan Ullah S/O Ghulam Roshan SS Chemistry	04.04.76	Banau		15.01.2010	17	Dis/Selectee	SS GHSS Gungur	17(S/M)E&SED/220117/SS (Males) date: 15.01.2010 (Ment 2009)
49	Muhammad Anwar S/O Ghulam Hassan SS Physics	05.10.78	Dikhan		23.02.2011	17	Dis/Selectee	SS GHSS Yanik Dik	17(S/M)E&SED/220117/SS (Males) date: 23.02.2011 (Ment 2009)
50	Said Zaidin S/O Muhammad Saiful Khan SS Physics	04.03.79	Lakeland	23.12.2011	23.12.2010	17	Dis/Selectee	SS GHSS Kol Kuala	17(S/M)E&SED/220117/SS (Males) date: 23.12.2010 (Ment 2009)
51	Shahid S/O Shah Wali SS Physics	21.03.81	Banau	05.02.2011	05.02.2011	17	Dis/Selectee	SS GHSS Ranau III	17(S/M)E&SED/220117/SS (Males) date: 05.02.2011 (Ment 2009)

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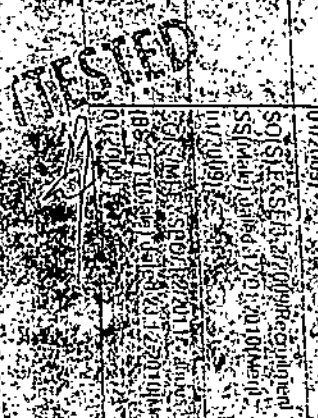
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Sr No	Name	Qualification	DOB	Gender	Religion	Marital Status	Category	Grade	Method	Designation/Place of Posting	Remarks
451	Shah Khan SS	SS with Qual	10/04/81	M	Swali	Married	General	17	D/Selectee	RITE Chitral	SO(S) EC 17/01/2010 SS(A) (A) 01/2009
452	Chandani	SS with Qual	28/01/82	F	Novachura	Single	General	17	D/Selectee	SS GHSS Shaktigram Chitral	SO(S) EC 17/01/2010 SS(A) (A) 01/2009
453	Mansil Ali	SS with Qual	05/01/83	M	Bannu	Single	General	17	D/Selectee	SS FATA	SO(S) EC 17/01/2010 SS(A) (A) 01/2009
454	Asghar Ali	SS with Qual	22/03/83	M	Mohmand Agency	Single	General	17	D/Selectee	SS GHSS Nawagai-Bannu	SO(S) EC 17/01/2010 SS(A) (A) 01/2009
455	Khan Shah	SS with Qual	01/05/75	M	Bannu	Single	General	17	D/Selectee	SS GHSS Ismail Khel Bannu	SO(S) EC 17/01/2010 SS(A) (A) 01/2009
456	Raj Wali	SS with Qual	06/01/78	M	Bannu	Single	General	17	D/Selectee	SS GHSS Kalkar Dir(Upper)	SO(S) EC 17/01/2010 SS(A) (A) 01/2009
457	Shah Wali	SS with Qual	04/03/79	M	Dir	Single	General	17	D/Selectee	SS GHSS Shandigal Dir (Upper)	SO(S) EC 17/01/2010 SS(A) (A) 01/2009
458	Mulhan	SS with Qual	20/04/79	M	Swat	Single	General	17	D/Selectee	SS GHSS Ziarat Faisal Dir(Low)	SO(S) EC 17/01/2010 SS(A) (A) 01/2009
459	Bakht	SS with Qual	24/08/82	M	Dir	Single	General	17	D/Selectee	SS GHSS Sandovi Shangla	SO(S) EC 17/01/2010 SS(A) (A) 01/2009
460	Amir	SS with Qual	01/01/83	M	Peshawar	Single	General	17	D/Selectee	SS GHSS Charal Swabi	SO(S) EC 17/01/2010 SS(A) (A) 01/2009
461	Ali Akbar	SS with Qual	05/03/76	M	Swabi	Single	General	17	D/Selectee	SS GHSS Sandovi Shangla	SO(S) EC 17/01/2010 SS(A) (A) 01/2009
462	Mulhan	SS with Qual	04/01/79	M	ER Kotial	Single	General	17	D/Selectee	SS GHSS Sandovi Shangla	SO(S) EC 17/01/2010 SS(A) (A) 01/2009
463	Mansil Ali	SS with Qual	01/01/80	M	Mahmand	Single	General	17	D/Selectee	SS GHSS Sandovi Shangla	SO(S) EC 17/01/2010 SS(A) (A) 01/2009

S. No.	Name of Officer with Designation	Grade	Description of Post	Remarks
1	Mr. A. K. Singh	ASST. COM.	ASST. COM. (General)	ASST. COM. (General) from 14.01.2010 to 14.01.2010 (1 day)
2	Mr. B. K. Singh	ASST. COM.	ASST. COM. (General)	ASST. COM. (General) from 14.01.2010 to 14.01.2010 (1 day)
3	Mr. C. K. Singh	ASST. COM.	ASST. COM. (General)	ASST. COM. (General) from 14.01.2010 to 14.01.2010 (1 day)
4	Mr. D. K. Singh	ASST. COM.	ASST. COM. (General)	ASST. COM. (General) from 14.01.2010 to 14.01.2010 (1 day)
5	Mr. E. K. Singh	ASST. COM.	ASST. COM. (General)	ASST. COM. (General) from 14.01.2010 to 14.01.2010 (1 day)
6	Mr. F. K. Singh	ASST. COM.	ASST. COM. (General)	ASST. COM. (General) from 14.01.2010 to 14.01.2010 (1 day)
7	Mr. G. K. Singh	ASST. COM.	ASST. COM. (General)	ASST. COM. (General) from 14.01.2010 to 14.01.2010 (1 day)
8	Mr. H. K. Singh	ASST. COM.	ASST. COM. (General)	ASST. COM. (General) from 14.01.2010 to 14.01.2010 (1 day)
9	Mr. I. K. Singh	ASST. COM.	ASST. COM. (General)	ASST. COM. (General) from 14.01.2010 to 14.01.2010 (1 day)
10	Mr. J. K. Singh	ASST. COM.	ASST. COM. (General)	ASST. COM. (General) from 14.01.2010 to 14.01.2010 (1 day)

ATTESTED

CR No	Name of Officers with Qualification	CRD Grade	Division	Date of Issue Entry in Edm Deptt	Reg. Date of Entry	Grade	Method	Designation	Remarks
664	Shah Jahan S/o Juma Khan SS English	04.01.73	Kohat	24.01.2011	24.02.2011	17	Dis/Selectee	SS GHSS Islamabad Rayan Kohat	SO(SM) ES/SED/3-27201 (Various (BS-17) (Male) dated 23.12.2010(Ment) 01/2009)
674	Muhammad Masim S/o Muhammad Yousof SS Pak Study	06.01.73	Manshera	14.11.1993	12.01.2010	17	Dis/Selectee	SS GHSS Baler Kohistan	SO(S) ES/SED/3-27201 (Various (BS-17) (Male) dated 23.12.2010(Ment) 01/2009)
675	Gul Khilab S/o Khan Zaman SS Pak Study	06.01.74	Abbottabad	14.10.1994	12.01.2010	17	Dis/Selectee	SS GHSS Shikohpur	SO(S) ES/SED/3-27201 (Various (BS-17) (Male) dated 23.12.2010(Ment) 01/2009)
676	Najam ul Haq S/o Muhammad Saad SS English	12.01.74	Bahawalpur	14.09.1994	24.02.2011	17	Dis/Selectee	SS GHSS Rajouri	SO(SM) ES/SED/3-27201 (Various (BS-17) (Male) dated 23.12.2010(Ment) 01/2009)
677	Farid Anwar S/o Khalid Khan SS English	20.08.81	Karak	24.02.2011	24.02.2011	17	Dis/Selectee	RTE Kohat	SO(SM) ES/SED/3-27201 (Various (BS-17) (Male) dated 23.12.2010(Ment) 01/2009)
667	Muhammad Ishaq S/o Sakhi Rahman SS English	13.08.81	FR Bahawal	25.02.2011	24.02.2011	17	Dis/Selectee	SS GHSS Gulistan Feroz	SO(SM) ES/SED/3-27201 (Various (BS-17) (Male) dated 23.12.2010(Ment) 01/2009)
668	Farid Anwar S/o Khalid Khan SS English	20.08.81	Karak	24.02.2011	24.02.2011	17	Dis/Selectee	SS GHSS Biale Abbottabad	SO(SM) ES/SED/3-27201 (Various (BS-17) (Male) dated 23.12.2010(Ment) 01/2009)
669	Mansoor Shah S/o Gul Sher SS English	11.03.83	Charsada	26.11.2008	24.02.2011	17	Dis/Selectee	SS GHSS Jabori Manshera	SO(SM) ES/SED/3-27201 (Various (BS-17) (Male) dated 23.12.2010(Ment) 01/2009)
670	Shah Jahan S/o Muhammad Nawab SS Bookery	22.10.61	Manshera	25.11.1989	10.01.2011	17	Dis/Selectee	SS GHSS Ghazi Kot Buner	SO(S) ES/SED/3-27201 (Various (BS-17) (Male) dated 23.12.2010(Ment) 01/2009)
671	Gul Khilab Ahmad S/o Muhammad Ishaq SS Economics	07.05.67	Abbottabad	15.05.1986	12.01.2010	17	Dis/Selectee	SS GHSS Sani Kot Buner	SO(S) ES/SED/3-27201 (Various (BS-17) (Male) dated 23.12.2010(Ment) 01/2009)
672	Farid Muhammad S/o Sallia Muhammad SS Maths	02.02.71	Abbottabad	12.01.2010	12.01.2010	17	Dis/Selectee	SS GHSS Bagh Madia Dera	SO(S) ES/SED/3-27201 (Various (BS-17) (Male) dated 23.12.2010(Ment) 01/2009)
673	Muhammad Haq S/o Akbar Ghaffar SS Pak Study	06.11.72	Un	12.01.2010	12.01.2010	17	Dis/Selectee	SS GHSS Bagh Madia Dera	SO(S) ES/SED/3-27201 (Various (BS-17) (Male) dated 23.12.2010(Ment) 01/2009)



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**GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY
EDUCATION DEPARTMENT**

Dated Peshawar the January 01, 2018.

ORDER

E&SED/4-24/2015/FSL/BS-15M/HM/SS: In exercise of the power conferred under section-8 of the Khyber Pakhtunkhwa Civil Servants Act: 1973 (Khyber Pakhtunkhwa Act No.XVIII of 1973), the Final Seniority List of Headmaster/Subject Specialist BS-17 Elementary & Secondary Education Khyber Pakhtunkhwa as it stood on 13.12.2017 is hereby for information of all concerned.

CHIEF SECRETARY
KHYBER PAKHTUNKHWA

MUNEEB-UR-RAHMAN
SECTION OFFICER SCHOOL MALE

Dated Pesh the: 04.01.2018

DEPARTMENT OF
ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA

Dated Pesh the 17/11/2018

Subject: SI 118-17 Male HM/SS In exercise of the powers conferred under
the provisions of the Khyber Pakhtunkhwa Civil Servants Act, 1973, Khyber
Pakhtunkhwa Final Seniority List of Male Masters/Subject Specialist/BS-
17 Male Masters of Khyber Pakhtunkhwa as it stands on 15/12/2017 is hereby
published as follows:

Chief Secretary
Khyber Pakhtunkhwa

To: Secretary, Education Khyber Pakhtunkhwa, Peshawar with the request
to be kept on file for the purpose of concerned.

2. To: Masters Education Khyber Pakhtunkhwa, Attock

3. To: Masters Education Khyber Pakhtunkhwa, Peshawar

4. To: Masters Education Peshawar

5. To: Masters Education Khyber Pakhtunkhwa

6. To: Masters Education Khyber Pakhtunkhwa

7. To: Masters Education



Secretary
Education
Khyber Pakhtunkhwa

MUSHTAQ-UR-RAZVI
Secretary

DEPARTMENT OF
ELEMENTARY & SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR

A.S.O/AD/2017/Final Seniority List B-17/18

Dated Pesh the 17/11/2018

The above is forwarded for information to the

1. To: Chief Education Officers (Male), Khyber Pakhtunkhwa
2. To: Chief Schools (Male), Govt of Khyber Pakhtunkhwa Elementary
& Secondary Education Department with reference to his letter No
SI/ES/ED-424/2017/ES/BS-17 Male HM/SS dated 01/12/2018
3. To: Chief Elementary & Secondary Education Khyber Pakhtunkhwa

INTERESTED

Deputy Director, Establishment
Department of Elementary & Secondary Education
Khyber Pakhtunkhwa

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REVISED SENIORITY LIST OF SUBJECT SPECIALIST/HAED MASTERS OF THE ELEMENTARY & SECONDARY EDUCATION OF KHYBER PAKHTUNKHWA
 PESHAWAR 13.12.2017

S.NO	Name of officer with Qualification	D/O/B	Domicile	Date of entry in dept	Reg.date	grade	Date of officer of posting	Design/Place	remarks
1	Muhammad Farooq Khan, MA/B.Ed	05.04.1957	Swabi	07.10.1995	25.11.1997	17	By promotion		Terminated
685	Akhtar Zaman, BSc/B.Ed	15.01.1961	Bannu	24.10.1985	21.03.2010	17	By Promotion	HM GHS Jani Khel, Bannu	SO(PE-2- 6/E&SE/DPC Meeting/2010 dated 23.01.2012
686	Khairullah Khan BSc/B.Ed	03.09.1960	Karak	01.11.1986	27.03.2010	17	By Promotion	HM GMS Mami Khel, Karak	SO(PE-2- 6/E&SE/DPC Meeting/2010 dated 23.01.2012

Deputy Director (Establishment)
 Department of E&SE Khyber Pakhtunkhwa
 Peshawar

SSN	Name	DOB	Grade	Position	Start Date	End Date	Reason for Separation	Remarks
1	John Doe	12/15/55	Teacher	Elementary	08/01/82	05/31/88	Retired	
2	Jane Smith	03/22/60	Teacher	Elementary	09/01/83	06/30/89	Retired	
3	Robert Johnson	07/10/58	Teacher	Elementary	10/01/84	08/31/90	Retired	
4	Mary Williams	11/05/62	Teacher	Elementary	01/01/85	09/30/91	Retired	
5	David Brown	05/18/65	Teacher	Elementary	03/01/86	11/30/92	Retired	
6	Sarah Miller	09/01/68	Teacher	Elementary	05/01/87	10/31/93	Retired	
7	Michael Davis	12/12/70	Teacher	Elementary	07/01/88	04/30/94	Retired	
8	Elizabeth Wilson	02/28/72	Teacher	Elementary	09/01/89	07/31/95	Retired	
9	Christopher Moore	06/15/75	Teacher	Elementary	11/01/90	05/31/96	Retired	
10	Amanda Taylor	08/03/78	Teacher	Elementary	01/01/91	09/30/97	Retired	
11	James Anderson	10/20/80	Teacher	Elementary	03/01/92	11/30/98	Retired	
12	Michelle Garcia	01/10/82	Teacher	Elementary	05/01/93	03/31/99	Retired	
13	Kevin Martinez	04/25/85	Teacher	Elementary	07/01/94	05/31/00	Retired	
14	Stephanie Lee	07/08/88	Teacher	Elementary	09/01/95	07/31/01	Retired	
15	Brandon Clark	09/15/90	Teacher	Elementary	11/01/96	09/30/02	Retired	
16	Nicole White	11/22/92	Teacher	Elementary	01/01/97	11/30/03	Retired	
17	Tyler King	02/01/95	Teacher	Elementary	03/01/98	01/31/04	Retired	
18	Hannah Green	04/18/98	Teacher	Elementary	05/01/00	03/31/05	Retired	
19	Isaac Adams	06/05/01	Teacher	Elementary	07/01/02	05/31/06	Retired	
20	Grace Baker	08/20/03	Teacher	Elementary	09/01/03	07/31/07	Retired	

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SN#	Name of Donor or Contribution	Date Recd	Amount	Receipt No.	Category	Remarks
24	Joint of Robert \$0.20 of Robert SS Family	14/11/10			SS (S) Social Security	
25	Joint of \$0.60 of Robert SS Family	15/11/10			SS (S) Social Security	
26	Joint of \$0.00 of Robert SS Family	15/11/10			SS (S) Social Security	
27	Joint of \$0.00 of Robert SS Family	15/11/10			SS (S) Social Security	
28	Joint of \$0.00 of Robert SS Family	15/11/10			SS (S) Social Security	
29	Joint of \$0.00 of Robert SS Family	15/11/10			SS (S) Social Security	
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I hereby
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 as shown to
 me.

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The Secretary,
Elementary & Secondary Education Department,
Khyber Pakhtunkhwa, Peshawar.

E-1-1-1
37

SUBJECT: APPEAL AGAINST THE IMPUGNED SENIORITY LIST DATED 13.12.2017 WHEREBY NAME OF THE APPELLANT HAS WRONGLY BEEN MENTIONED AT SERIAL NO.686 INSTEAD OF SERIAL NO.292.

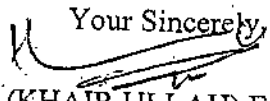
Respected Sir,

I have the honor to invite your kind attention towards an anomaly causing a heart breaking effect and sense of deprivation on me and my other colleagues, which is narrated as under:-

- i. I alongwith other 243 Headmasters were promoted from the post of SET to the post of Headmaster (BPS-17) on regular basis vide Notification dated 27.03.2010.
- ii. Much later some 314 Subject Specialists BPS-17 were appointed through Public Service Commission vide Notification dated 16.08.2010, 01.09.2010, 23.12.2010, 03.01.2011, 11.01.2011, 24.02.2011, 25.03.2011 and 10.11.2011.
- iii. In the Final Seniority list of officers of BPS-17 (Headmaster/SS), stood on 31-12-2017, I stand at S.No.686 but in the said Seniority list my correct place should have been at S.No.197 instead of 686.
- iv. In the same seniority list 314 Subject Specialists who have been appointed through Public Service Commission years and months later than me but they have been placed/declared senior to for the reasons not known.
- v. The above discrepancies on part of the Department have caused me waiting for promotion to BPS-18 since long whereas the above mentioned officers have got promotion inspite of the fact that they are much junior to me.

In view of the above it is requested that I may kindly be allotted correct place in the seniority list of officers of BPS-17 of teaching cadre and I may kindly be promoted to BPS-18 enabling me get due right of seniority and promotion.

Dated: 10.09.2020

Your Sincerely,

(KHAIR ULLAH) Ex-HM
GHS Mami Khel, Karak



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

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Peshawar the September 14, 2020

NOTIFICATION

NO. AO/E&SE/6-14/LPR/Karak: Without prejudice to the legal remedies available to Provincial Government and in pursuance of the judgement of Peshawar High Court, dated 19.02.2020, in writ petition No. 5673/P/2019, Mr. Khair Ullah Khan, Ex-HM (BS-17) GHS Mami Khel, Karak, stood retired from Govt. service on 02-09-2020 (A.N) on attaining the age of superannuation, as his date of birth is 03-09-1960, subject to the outcome of CPLA/ Appeal of the Provincial Government against aforementioned judgement of Peshawar High Court and any order contrary and when issued by the apex Court of Pakistan.

The Competent Authority is further please to allow him 305 days encashment of leave in lieu of LPR as admissible to him under the Revised Leave Rules, 1981.


Endst: of even No. & date:

SECRETARY
Govt. of Khyber Pakhtunkhwa
Elementary & Secondary Edu: Department

Copy forwarded to:

1. The Director, Elementary & Secondary Education, Peshawar.
2. The District Accounts Officer, Karak.
3. The Director, EMIS Cell, E&SE Department for uploading at official website.
4. The Section Officer (Schools/Male), Elementary & Secondary Education Department.
- ✓ 5. Mr. Khair Ullah Khan, Ex-HM (BS-17) GHS Mami Khel, Karak.

8/copy


(ABDUL GHAFFAR)
SECTION OFFICER (ACCOUNTS)

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

_____ OF 2021

Chair Allah

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt.

(RESPONDENT)
(DEFENDANT)

I/We Chair Allah

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

Dated. ____/____/2021

Chair Allah

CLIENT

ACCEPTED

NOOR MOHAMMAD KHATTAK

MIR ZAMAN SAFI

AFRASIAB KHAN WAZIR

HAIDER ALI
ADVOCATES

OFFICE:

Flat No.4, 2nd Floor, Juma Khan
Plaza, near FATA Secretariat,
Warsak Road, Peshawar.
Mobile No.0345-9383141

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA
SERVICE TRIBUNAL PESHAWAR.**

Service Appeal No: 838/2021

Khair Ullah Ex-HM (BPS-17) GHS Mami Khel District
Karak.....Appellant

VERSUS

Secretary (E&SE) Department, Khyber Pakhtunkhwa &
others.....Respondents

JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-3.

Respectfully Sheweth :-

The Respondents No.1-3 submit as under: -

Preliminary objections

- 1) That the appeal is not maintainable and incompetent in the eyes of Law in the present form.
- 2) That the appellant is estopped due to her own conduct to file this appeal.
- 3) That the appellant has got no cause of action and locus standi to file instant appeal.
- 4) That the appellant has not come to the Tribunal with clean hands and has suppressed all relevant facts.
- 5) That the appeal is bad for mis-joinder and non-joinder of necessary parties.
- 6) That the appeal filed by the Appellant is pre-mature and the appellant has concealed the material facts from Honorable Tribunal.

- 7) That the Honorable Service Tribunal has no jurisdiction to entertain the instant appeal in its present form.
- 8) That the appeal has been mis-oriented, mis-constructed and mistakenly drawn and is incompetent in its present frame and context, and is liable for Rejection.
- 9) That the appeal is weak having no force, fabricated, fictitious, based on ill will, mala fide and having no footings in the eyes of law.
- 10) That proceeding with the instant appeal would be a futile exercise and just wastage of the precious time of this Honorable Tribunal.
- 11) That as stated in the objections supra, the appeal is bereft of cause of action and is liable for dismissal.

Respectfully Sheweth

- 1) Para pertains to the appointment of appellant as SET vide order dated 07.01.1989, hence need verification.
- 2) This para need verification.
- 3) This para pertains to the promotion of appellant to the post of Head Master BS-17 vide Notification dated 27.03.2010.
- 4) Incorrect / not admitted. This para is related to the seniority list of Subject Specialist (BS-17) of year 2017, the name of appellant reflects at S No. 686 of the seniority list among his colleagues.
- 5) This para pertains to the departmental representation of appellant. The appellant filed departmental appeal on 14.09.2020 against the seniority list of the year 2017. This departmental appeal of the appellant is badly time barred. Such departmental appeal does not confer any useful right to the appellant being badly time barred. "*Law favor vigilant not indolence*"

6) Incorrect / not admitted. The appellant is not an aggrieved person. The service appeal of the appellant is an exercise in futility. Further proceeding in this regard would bear no fruit. It is, therefore, requested to this Honorable Tribunal to dismiss the Service Appeal of the appellant with cost being devoid of merit.

OBJECTIONS ON GROUNDS

- A. Incorrect / not admitted. The action of the respondents was according to law, based upon the natural principle of justice. No discrimination has been made with present appellant.
- B. Incorrect / not admitted. The act of respondent was according to law, the name of appellant was placed at proper place in the seniority list and no discrimination has been made with present appellant.
- C. Incorrect / not admitted. The seniority list is maintained in December of each year. Appellant had challenged the seniority list of December 2017 in present service appeal after laps of 03 years.
- D. This para need verification.
- E. Incorrect / not admitted. The present service appeal is violation of Civil Servant Act 1973; appellant is aggrieved from the seniority list of December 2017 and filed departmental appeal in September 2020 after laps of 03 years.
- F. Incorrect / not admitted. The seniority list prepared by the respondent departmental was according to law, based upon the natural principle of justice; no discrimination has been made with present appellant.
- G. The counsel for respondents may kindly be allowed to raise additional grounds at the time of arguments.

Therefore, in view of the above made submissions, it is most humbly requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant Service Appeal in favor of the Respondents in the interest of justice.

Dated ___/ ___/2022



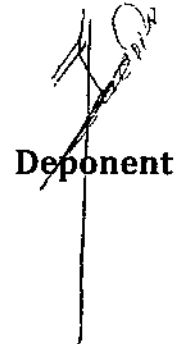
DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No: 3)



SECRETARY
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No: 1 & 2)

AFFIDAVIT

I, Dr. Hayat Khan Assistant Director (Litigation-II) E&SE Department Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant Para Wise Comments are true & correct to the best of my knowledge & belief.



Deponent