

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

In Re: Service Appeal No. 748 /2018

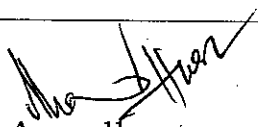
Muhammad Hassan Appellant

VERSUS

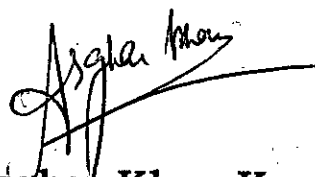
Secretary to Govt of KPK & others Respondents

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Service Appeal		1-5
2.	Affidavit		6
3.	Copy of the notification	A	7-8
4.	Copy of the seniority list dated 01.01.2018	B	9-14
5.	Copy of the departmental appeal	C	15
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Appellant

Through


Muhammad Asghar Khan Kundi
Advocate, High Court Peshawar

①

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

In Re: Service Appeal No. 748 /2018

Diary No. 1002

Dated 28/5/2018

Muhammad Hassan

S/o Haji Malik Jabbar

R/o 67-C, Circular Road, University Town, Peshawar.

..... **Appellant**

VERSUS

1. Secretary to Govt of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department
Civil Secretariat Peshawar.
2. Director Elementary & Secondary Education,
Khyber Pakhtunkhwa, near Firdous Cinema
Peshawar
3. Director Education FATA,
FATA Secretariat, Warsak Road, Peshawar.

..... **Respondents**

Filed to-day

Registrar

28/5/18

APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT AGAINST THE FINAL

SENIORITY LIST OF SENIOR SCHOOL
TEACHERS AS IT STOOD ON 01.01.2018

Respectfully Sheweth:

1. That the Appellant was initially appointed as SET (Technical) on 06.04.1982 on fixed monthly Salary; the Appellant was confirmed as SET on 04.11.1982. The same is reflected in the notification dated 21.03.2009 of the Respondent No 1. **(Copy of the notification is Annex A)**

2. That the Respondent No 2 issued a fixed seniority list of the SST General, Science, Technical and Commerce of Elementary and Secondary Education Khyber Pakhtunkhwa as it stood on 01.01.2018. The Appellant name figure at serial No 6 of the said list, however the Appellant was shocked to note that although the date of his first appointment as SET has been correctly mentioned as 06.04.1982, the Appellants date of regular appointment as SET has been incorrectly mentioned as 16.10.1991, whereas the correct date is 04.11.1982. **(Copy of the seniority list dated 01.01.2018 is Annex B)**

3. That the Appellant submitted a departmental representation / appeal dated 30.01.2018 to the Respondent No 1 for redressal of his grievance. **(Copy of the departmental appeal is Annex C)**

4. That the Respondent No 1 failed to adjudicate upon the Appellant's appeal and no reply has been communicated to the Appellant.
5. That aggrieved of the incorrect entry in the final seniority list of SST dated 01.01.2018 and failure of the Respondent to rectify the same, the Appellant approach this Hon'ble Tribunal on the following amongst other grounds:

GROUND:-

- A. That the impugned seniority list of SST dated 01.01.2018 is incorrect to the extent of Appellant and as such needs rectification to that extent.
- B. That the Appellant was fully qualified at the time of his appointment as SET and as such his service were regularized/confirmed vide order dated 04.11.1982. The Respondent No 2 is estopped to make any changes / alteration in the date of regularization of the Appellant's service to the detriment of the Appellant.
- C. That the Appellant's seniority as SST has to be reckoned from 04.11.1982 and not from 16.10.1991, as reflected in the impugned seniority list. The insertion of 16.10.1991 as date of Appellant's regularization of service is glaring

injustice to the Appellant and needs rectification of the same by this Hon'ble Tribunal.

D. That the Respondents have time and again confirmed that the Appellant's date of regularization of service as SET/ SST is 04.11.1982, as reflected in notification dated 21.03.2009 of the Respondent No 1. The Respondents are prevented from any alteration in the same keeping in view the principle of locus poenitentiae.


E. That on account of the subject incorrect mentioning of the Appellant's date of regularization of service, in the final seniority list of SST, the Appellant has been made junior to several other SST, who had joined service after the Appellant and are junior to the Appellant.

F. That the Appellant seeks leave of this Hon'ble Tribunal to raise additional grounds at the time of arguments.

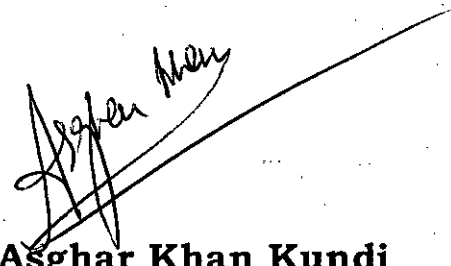
It is, therefore, humbly prayed that on acceptance of this appeal, the Appellant's date of regular appointment as SST may very graciously be declared as 04.11.1982 and direction be issued to the Respondents to correct the final seniority list of SST, quo the Appellant.

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Any other relief deemed appropriate but not specifically asked for may also be granted.


Appellant

Through



Muhammad Asghar Khan Kundi
Advocate, High Court Peshawar

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

In Re: Service Appeal No. ____/2018

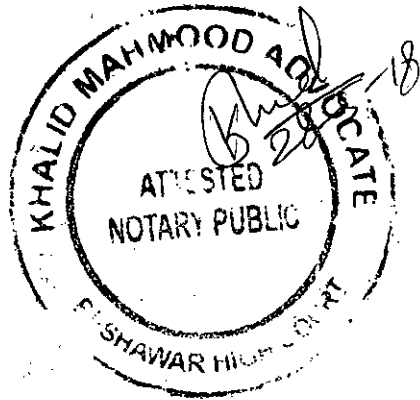
Muhammad Hassan Appellant

VERSUS

Secretary to Govt of KPK & others Respondents

AFFIDAVIT

I, Muhammad Hassan S/o Haji Malik Jabbar R/o 67-C, Circular Road, University Town, Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



[Handwritten Signature]

DEPONENT

CNIC # _____



Amien 'A'

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GOVERNMENT OF NWFP
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT.

Dated 21-03-09

NOTIFICATION

No.SO(PE)2-6/SET(B-16)Upgradation to B-17: The Competent Authority on the recommendation of Departmental Promotion Committee and in consultation with Finance Department is pleased to allow one time up gradation from B-16 to B-17 (Personal) to the following 163 SETs Male, 132 SETs Female and 14 SETs (Technical) with immediate effect subject to the condition that the posts of SET shall be downgraded from B-17 to B-16 as and when vacated by the incumbents:

i) **163 SETs Male(General)**

S.No	Seniority List No.	Name of Officer	Date of Appointment as Regular SET	Present Place of Posting
1.	736A	Pasham Khan	27-11-85	A.A.E.O Office F.R.D.I.Khan
2.	838	Muhammad Shoaib	04-11-86	GHS Billitang Kohat
3.	869	Mohabbat Khan	14-12-86	GHS Kam- Shalman-Landi Kotal Khyber Agency
4.	870	Yousaf Hussain	01-11-86	GHS Shalozan Kurram
5.	879	Munir Hussain	16-12-86	GHS Zeran Kurram
6.	942	Javed Khan	24-02-87	GHS Dingi Haripur
7.	943	Bahadar Ali	24-02-87	GMS Alamganj Swat
8.	944	Mohammad Younis	25-02-87	GMS Afzal Abad Mansehra
9.	953	Shamsher ali	04-03-87	ADO S/L DIK Surkamar (Khyber)

		Mehmood		
9.	96	Muhammad Iqbal	25-04-85	GCMS #-3 Mardan
10.	99	Muhammad Zahir Shah	01-07-86	GHSS TOTAKAN Mkd Agency
11.	102	Ayaz Khan	30-10-86	GCHSS Kohat
12.	103	Muhammad Hassan	04-11-82	GHSS Jamrud Khyber Agency
13.	111	Ibad Ullah	16-10-89	GTHSS Gulbahar Peshawar
14.	113	Naqib Ullah	16-10-90	GEC Mir Ali Miran Shah

SECRETARY TO GOVT. OF NWFP
ELEMENTARY AND SECONDARY
EDUCATION DEPARTMENT.

Endst No. No.SQ(PE)2-6/SET(B-16)Upgradation to B-17: Dated 21-03-09

Copy Forwarded to the :

1. The Accountant General NWFP Peshawar
2. Secretary to Govt .of NWFP Establishment Department
3. Secretary to Govt .of NWFP Finance Department
4. Director Elementary & Secondary Education NWFP Peshawar
5. Director PITE NWFP Peshawar
6. Director Education FATA NWFP Peshawar
7. All EDOs E&SE in NWFP
8. All District /Agency Accounts Officers
9. PS to Chief Secretary NWFP
10. Officers concerned
11. PS to Minister Elementary & Secondary Education NWFP
12. PS to Secretary Elementary & Secondary Education NWFP
13. Office Order File



ARIF JAMIL
SECTION OFFICER (PRIMARY)

Annen 'B'

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FINAL SENIORITY LIST OF SSTs-GENERAL SCIENCE, TECHNICAL AND COMMERCE OF ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTUNKHWA STOOD ON 01.01.2018								
Sl No	Name and Qualification	School/Office	Year of B.Ed	Date of Birth	District	Date of Ist. Appnt: in Edu Deptt;	Date of Appnt: / Appr of SET	Remarks
1	MUHAMMAD MAJEED SST (TECH) MA MED BSC TECH	GMS CHAH-MALWANA DJ KHAN	1988	08.01.1965	DI KHAN	05.03.1988	05.03.1988	
2	MUHAMMAD AYUB SST (TECH)	GCMHS NO.1 DJ KHAN	1988	20.10.1963	DI KHAN	18.12.1985	25.03.1988	
3	MUHAMMAD MAJEED GUL SST MA EDUCATION	GHS BAGH BAN PURA AKORA KHATTAK NOWSHERA	1989	26.02.1960	NOWSHERA	2.5.1982	12.11.1990	
4	MUHAMMAD ULLAH SST (TECH)	GHSS BAGHDADA MARDAN	1990	02.01.1964	MARDAN	27.12.1990	27.12.1990	
5	MUHAMMAD KHAN SST TECHNICAL	GHS TAKHT BHAI MARDAN	1988	30.11.1959	MARDAN	17.01.1991	17.01.1991	
6	MUHAMMAD HASSAN SST (TECH)	GHS SUR KAMAR KHYBER AGENCY	1991	16.05.1959	NWA	06.04.1982	16.10.1991	
7	MUHAMMAD SALEEM SST (TECH)	GHS NO.1 MINGORA SWAT	1991	06.05.1960	SWAT	16.5.1982	16.10.1991	
8	MUHAMMAD ELAHI S/O FAZAL ELAHI SST BA TECHNICAL	GHSS NO 1 HARIPUR	1991	06.01.1962	HARIPUR	26.05.1983	16.10.1991	
9	MUHAMMAD ULLAH SST (TECHNICAL)	GHS MIRAN SHAH NWA	1991	12.04.1963	FR BANNU	16.10.1991	16.10.1991	
10	MUHAMMAD ALI S/O USMAN WALI SST TECHNICAL	GHS NO.2 BANNU	1991	08.04.1964	FR BANNU	19.05.1986	16.10.1991	
11	MUHAMMAD HASSAN S/O KHUDA BAKHSI SST MA BED	GHS KURRAI DI KHAN	1992	15.06.1963	DI KHAN	16.11.1987	22.12.1992	
12	MUHAMMAD AHSAN S/O NOOR MUHAMMAD SST MA BED	GOVT. SHAHEED RIZWAN SAREER HIGHER SECONDARY SCHOOL UTMANZAI CHARSADDA	15.04.1993	01.04.1965	MOHAMMAD AGENCY	06.03.1987	15.04.1993	
13	MUHAMMAD HADAYAT ULLAH SST MA MED	GHS DABLI LAWAGHAR KARAK	29.04.1993	03.03.1966	KAPAK	07.04.1988	22.04.1993	FOREGONE PROMOTION
14	MUHAMMAD SHAHIR AHMAD SST MA B ED	GCMHS ABBOTTABAD	1993	10.6.1964	HARIPUR	23.09.1985	07.09.1993	
15	MUHAMMAD SALIM KHAN SST BSC B ED	GMS DASHKA SWA	5.3.1994	15.09.1951	SWA	11.3.1987	05.03.1994	
16	MUHAMMAD SHAH JEHAN SST	GHSS MOHANDARI, MANSEHRA	5.3.1994	22.10.1961	MANSEHRA	23.11.1989	05.03.1994	
17	MUHAMMAD FARAZ SST MA B ED	GHSS SHAHBAZ KHEL LAKKI MARWAT	8.5.1994	8.3.1964	FATA	11.3.1990	05.05.1994	
18	MUHAMMAD SAAD HUSSAIN SST	GHS NO.2, TANGI, CHARSADDA	8.5.1994	7.5.1960	CHARSADDA	10.12.1989	02.05.1994	
19	MUHAMMAD YUSAF KHAN MA B ED	GHS MANKIAL SWAT	8.5.1994	10.7.1966	SWAT	12.12.1989	10.11.1994	
20	MUHAMMAD NAZIR SHAH SST BA BED	GHS MALANGAI BAJOUR AGENCY	8.5.1994		FATA	25.05.1989	10.11.1994	
21	MUHAMMAD HANIF		1994			10.11.1994	10.11.1994	
22	MUHAMMAD AHMAD AWAIS	GHS HAAWAL	1994			10.11.1994	10.11.1994	
23	MUHAMMAD ASGHAR KHAN		1994	24.03.1963	ABBOTTABAD	29.05.1989	10.11.1994	
24	MUHAMMAD MUHAMMAD TAHIR		1994			10.11.1994	10.11.1994	
25	MUHAMMAD MUHAMMAD DULLAH SST BA BED	GHS MOHAMMAD KHEL NWA	1994		FATA	10.11.1994	10.11.1994	
26	MUHAMMAD SADEER REHMAN		1994			10.11.1994	10.11.1994	
27	MUHAMMAD SADEER ALI BAKHASH		1994			23.10.1986	10.11.1994	
28	MUHAMMAD MERRAK SHAH SST	GHS YOUSAF KHEL MOH AGY	1994	1.9.1966	MOHAMMAD AGENCY	15.11.1984	10.11.1994	
29	MUHAMMAD SHAMSHER KHAN MA B ED	GHS HAKIM KHAN BANNU	1994	1.2.1962	BANNU	10.3.1985	10.11.1994	
30	MUHAMMAD ALI RUSAIN BA B ED	GHSS NATHIA GALI A. ABAD	1994	5.3.1963	ABBOTTABAD	10.11.1994	10.11.1994	
31	MUHAMMAD NAWAZ JILAH MSC B ED	GHS JALBAI SWABI	1994	2.3.1965	SWABE	1.10.1983	10.11.1994	
32	MUHAMMAD SADEER RAHMAN		1994			10.11.1994	10.11.1994	
33	MUHAMMAD SADEER DAE KHAN	GHS RAGHZI KALLAN TRWA	1994	14.03.1970	FR BANNU	10.11.1994	10.11.1994	
34	MUHAMMAD SADEER MUHAMMAD BSC B ED	GHS WANDA AURANGZEB	1994	4.8.1964	BANNU	10.11.1994	10.11.1994	
35	MUHAMMAD SADEER RAHMAN		1994			10.11.1994	10.11.1994	
36	MUHAMMAD SADEER SADEER KARIM		1994			10.11.1994	10.11.1994	
37	MUHAMMAD SADEER SADEER		1994			10.11.1994	10.11.1994	

(Handwritten signature)

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S.No	Name and Qualification	School/Office	Year of B.Ed	Date of Birth	Domicile	Date of Ist. Apptt: in Edu Deptt;	D/o of Apptt: /Appr of SET	Remarks
37	MR MUHAMMAD IQBAL BA B ED	GHS KALAM SWAT	1994					
38	MR SAH E UL KHAN BA B ED	GHS GAND SARH	1994	15.04.1968	SWAT	10.11.1994	10.11.1994	
39	MR RIAZ MUHAMMAD		1994	2.1.1965	ORAKZAI AGENCY	10.11.1994	10.11.1994	
40	MR RIAZ QURESHI BA B ED	GHS NO 2 KARAK	1994					
41	MR. BAZAR KHAN MA B ED	GHS NANKA SWAT	1994	10.5.1965	KARAK	4.12.1982	10.11.1994	
42	MUHAMMAD ASLAM KHAN BA B ED	GHS DAGGAR AMAR ZAI BANNU	1994	5.3.1960	SWAT	22.10.1989	10.11.1994	
43	MUHAMMAD IQBAL MA B ED SST	GHS KOZ PATA	1994	25.01.1965	BANNU	4.12.1982	10.11.1994	
44	SHAMSLR REHMANI		1994	14.1961	FATA	10.11.1994	10.11.1994	
45	ABDUL HAFEEZ MA B ED SST	GHS AHMAD KHEL BANNU.	1994					
46	MUHAMMAD HASHAY KHAN SST MA B ED	GHS KOTLA DI KHAN	1990	15.03.1964	BANNU	16.10.1986	10.11.1994	
47	BHALAM CASIM ESC B ED SST	GHS KALAF HA DI KHAN.	1994	11.11.1966	BANNU	1.9.1988	10.11.1994	
48	SAJID MAHMOOD		1994		DI KHAN	10.4.1986	10.11.1994	
49	SAID KHAN BA MED SST	GHS NO 2 KARAK	1994			24.11.1985	10.11.1994	
50	FAZLI KAEIR AFRIDI	GHS ZIA DAFKA AGENCY	1994	7.10.2005	KARAK	1.10.1985	10.11.1994	
51	SAFDAR ALI BSC B ED SST	GHS GADEZAI BUNER.	1994	25.2.1962	KURRAM AGENCY	24.11.1985	10.11.1994	
52	IRSHAD ALI BSC B ED SST	GHS CHAFS PODA.	1994	5.5.1964	SWAT	2.2.1981	10.11.1994	
53	IOBAL SHAH	GHS GULISTAN ORKAGY.	1994	2.1.1965	CHARSADDA	10.11.1994	10.11.1994	
54	IOBALUR REHMAN BSC B ED	GHS NO 1 GHAT	1994	15.12.1966	ORAKZAI AGENCY	10.11.1994	10.11.1994	
55	IHRAR HUSSAIN		1994	15.04.1966	KARAK	10.11.1994	10.11.1994	
56	FIDA MUHAMMAD MSC BED	GHS KHAZA MAWAZ KORONA	1994			10.11.1994	10.11.1994	
57	SHOUKAT MAHMOOD MA EDU	GHS HAHAKGIAN H PUR	1994	11.10.1964	CHARSADDA	10.11.1994	10.11.1994	
58	NAZ MUHAMMAD KHAN BA B ED	GHS CHOWKA SWAT	1994	6.10.1965	ABBOTTABAD	10.11.1994	10.11.1994	
59	MUHAMMAD SHAHIR SST MA EDU	GOMHS TUFEELA TOWNSHIP HARIPUR	1994	8.9.1961	SWAT	25.01.1987	10.11.1994	
60	UBAIDULLAH BA B ED	GHS GAWAL AR SWAT	1994	02.09.1963	HARIPUR	7.12.1988	10.11.1994	
61	MUHAMMAD ANJUM TAHIR BA B ED	GHS PORUMADH	1994	4.4.1963	SWAT	02.03.1986	10.11.1994	
62	ABDUS SABOOR		1994	2.11.1960	MARDAN	24.09.1987	10.11.1994	
63	FAZLI MAHMOOD MSC BED	GHS KOHSAFI DIR	1994			14.09.1987	10.11.1994	
64	FARIDULLAH		1994	1.1.1961	DIR	1.12.1986	10.11.1994	
65	ABDUL JABBAR KHAN		1994			1.12.1986	10.11.1994	
66	ZAKARIA SST MA B ED	GHS EAGAN ABBAD	1994			10.11.1994	10.11.1994	
67	M. HUSSAIN AZAD		1994	3.4.1965	ABBOTTABAD	8.10.1964	10.11.1994	
68	ALI AKBAR		1994			14.07.194	10.11.1994	FOREIGN PROMOTION
69	ASHRAF HUSSAIN MA EDU	GHS DILGUP	1994			10.11.1994	10.11.1994	
70	ZIA AHMAD KHAN	GHS NO 2 DI KHAN	1994	15.03.1967	MANSEHRA	10.11.1994	10.11.1994	
71	HASRAN GUL BSC B ED	GHS NO 2 KARAK	1994	28.10.1965	DI KHAN	10.11.1994	10.11.1994	
72	MUHAMMAD CASIM ESC B ED	GHS ANNOI	1994	16.08.1961	KARAK	10.11.1994	10.11.1994	
73	MUHAMMAD SADIQ ESC B ED	GHS PAICHTA SEAD	1994	6.1.1962	SWAT	1.12.1988	10.11.1994	
74	SHAKIR ULLAH BA B ED	GHS BALA EFAMVD KHEL	1994	15.04.1963	ABBOTTABAD	10.11.1994	10.11.1994	
75	MUHAMMAD SALIM BA B ED	GHS SHANGA PRYAN	1994	8.7.1964	PESHAWAR	5.4.1987	10.11.1994	
76	ABDUL QAYUM SHAH	GHS PATRA D P	1994	1.1.1964	MANSEHRA	11.1.1986	10.11.1994	
77	BAHRAWAR	GHS MANI D P	1994	1.2.1966	CHARSADDA	9.10.1982	10.11.1994	
78	MIR QASIM KHAN	GHS MALI D P	1994	5.3.1960	SWAT	10.11.1994	10.11.1994	
79	ABDUL HAMID		1994	14.10.1963	LAKKI MARWAT	4.12.1982	10.11.1994	
80	ISAAMUL HAD		1994	20.01.1964	SWABI	17.11.1984	10.11.1994	
81	MUHAMMAD ISLAM KHAN	GHS MUHAMMAD YARDAIR BAN	1994	11.4.1964	LAKKI MARWAT	7.10.1983	10.11.1994	
82	TAHIR KHAN		1994	13.11.1963	BANNU	10.11.1994	10.11.1994	
						18.11.1986	10.11.1994	
						14.11.1983	10.11.1994	

ATTN/STAB

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S.No	Name and Qualification	School/Office	Year of B.Ed	Date of Birth	Domicile	Date of 1st Appr: in Edu Deptt;	D/O of Appoint: /Appr of SET	Remarks
83	MUHAMMAD SALAM		1994					
84	MUHAMMAD SAJJAD MA EDU	GHS BANGALIA	1994	6.16.1968	ABBOTTABAD	2.10.1982	10.11.1994	
85	AHMAD SHIRAZ	GHS SAJID PUNJAB	1994	31.03.1964	HARIPUR	21.05.1992	10.11.1994	
86	RAZIATULLAH, M.SC; BED	GHS SHARAF ABAD	1994	15.04.1961	SWABI	2.10.1982	10.11.1994	
87	ABDUL CASIM BSC B ED	GHS MAJID ABAD	1994	6.2.1965	SWABI	12.10.1983	10.11.1994	
88	MUHAMMAD AYAZ SST BA BED	GHS FANJANA, F.EL BANNU	1993	01.04.1968	FR BANNU	10.11.1994	10.11.1994	
89	SHER MUHAMMAD		1992			12.09.1987	10.11.1994	FOREGONE PROMOTION
90	TEHSINULLAH KHAN	GHS LAND ARBEE	1994	3.10.1964	MOHMAND AGENCY	10.11.1994	10.11.1994	
91	REHMANULLAH BA BED	GHS DALAZA, CHARSADDA	1994	3.1.1965	PESHAWAR	21.12.1985	10.11.1994	
92	HAMIDULLAH JAN BA BED	GHS MUSLIM PETA KOHAT	1994		CHARSADDA	4.12.1988	10.11.1994	
93	JUNAID AKHTAR S O SHAH ALAM KHAN		1994		KARAK	10.11.1994	10.11.1994	
94	MUHAMMAD JAVED	GHS NAFAKAT BANNU	1994	29.04.1967	KARAK	10.11.1994	10.11.1994	
95	SH.M ASLAM S.O K. BAKHASH		1994		BANNU	11.12.1989	10.11.1994	
96	HUR HUSSAIN BANGASH S.O NASIR HUSSAIN	GHS SHAHZAN	1994	18.03.1968	D.I KHAN	21.08.1985	10.11.1994	
97	SHERIN ZADA SST BA BED	GHS DHEP, S&T	1994		KURRAM AGENCY	10.11.1994	10.11.1994	
98	MUHAMMAD NAWAZ		1994	11.1.1961	SWAT	22.11.1988	10.11.1994	
99	AZIZUL HAO BSC MED	GHS RAHAT PAF DIF	1994		FR KOHAT	10.11.1994	10.11.1994	
100	KALIMULLAH KHAN		1994	1.8.1964	SWAT	21.09.1987	10.11.1994	
101	ABBAS ALI MA B ED	GHS SAMPI KURRAM	1994	16.04.1963	D.I KHAN	10.11.1994	10.11.1994	
102	MUHAMMAD AURANGZEB MA MED	GHS ZIARA, MASTOM AABAD	1994	15.05.1966	KURRAM AGENCY	10.11.1994	10.11.1994	
103	M RAFIQ JADOON MA MED	GHS MADAFAN ABAD	1991	16.06.1964	ABBOTTABAD	1.10.1985	10.11.1994	
104	MUHAMMAD JISHAO BSC B ED	GHS SHEZAR DIF	1992	1.1.1966	SWAT	21.11.1984	10.11.1994	
105	MUHAMMAD ALMAR AFRIDI	GHS SHARA KHATA	1992	20.10.1966	FR KOHAT	25.09.1988	10.11.1994	
106	MALIK JAN		1994		FR KOHAT	21.04.1990	10.11.1994	
107	KHALID KHAN		1994		FR KOHAT	10.11.1994	10.11.1994	
108	FAIZUR REHMAN		1994			10.11.1994	10.11.1994	
109	ZARI AMAN MA B ED	GHS SHALEANG SWAT	1994	21.04.1963	SWAT	10.11.1994	10.11.1994	
110	KHAIRULLAH JAN SST MA B ED	GHS SAFI POFANG LAKKI MARWAT	1992	10.1.1965	LAKKI MARWAT	16.09.1986	10.11.1994	
111	S ANJAD ALI SHAH	GMS BUDA PAF SHARIAN	1994	18.05.1966	ABBOTTABAD	16.09.1986	10.11.1994	
112	SHAHBUDIN	GHS ASHRAF DIF	1994	3.1.1961	ABBOTTABAD	16.09.1986	10.11.1994	
113	MEHRUDIN SST	GHS MUHAMMAD F.EL SWA	1994	10.2.1962	HARIPUR	10.11.1994	10.11.1994	
114	MUHAMMAD SABIR MA B ED	GHS THAL	1991	28.08.1958	NWA	10.11.1994	10.11.1994	
115	WAHEED KHAN MA B ED	GMS S-EEH SWAT	1994	1.3.1962	KOHAT	7.12.1984	10.11.1994	
116	AKHTAR REHMAN SST		1992		SWAT	24.10.1982	10.11.1994	
117	MR MUTAHER HUSSAIN BA B ED SST	GHS KIFMAN, FRAM AGENCY	1994		FATA	10.11.1994	10.11.1994	
118	MUHAMMAD IRSHAD BA BED SST	GHS NEA, PESHAWAR MANSEHRA	1994	2.4.1964	MANSEHRA	1.10.1985	10.11.1994	
119	MASOOD JAN SST MA BED	GHS SHARAF DIF, CHARSADDA	1994	12.1.1963	CHARSADDA	26.11.1985	10.11.1994	
120	MR LIAQAT ALI, SST MA BED	GHS MCM TANE, FR BANNU	21.05.1965	5.7.1960	CHARSADDA	15.10.1988	10.11.1994	
121	MR MASROOF SHAH SST MA BED	GHS GUCHAN, HARIPUR	1994	6.4.1966	FATA	21.10.1987	31.12.1994	
122	MR KIFAYAT ULLAH SST MA BED	GHS FALOG, MASTOM PESHAWAR	1994	6.4.1966	HARIPUR	7.1.1991	31.12.1994	
123	MR ZIA UD DIN, SST	GHS PAF ABAD, PESHAWAR	1995	3.4.1958	PESHAWAR	13.10.1987	21.02.1995	
124	MR MUHAMMAD JAMIL MA B ED	GHS S-EEH, F.EL BANNU	1985	13.12.1957	MARDAN	15.12.1987	21.05.1995	
125	MR. AJMAL KHAN MA B ED	GHS KAFI, BANNU	1985	10.12.1959	ZOHEIV	28.10.1975	23.05.1995	
125-A	SAIF UR REHMAN S/O ABDUL AZIZ SST MA MED	GHS CHAND, LAKKI	1985	18.05.1961	ZONEIV	2.2.1985	23.05.1995	

ATTACHED

12

S.No	Name and Qualification	School/Office	Year of B.Ed	Date of Birth	Domicile	Date of Ist Apptt: in Edu Deptt;	D/o of Appointt: /Appr of SET	Remarks
126	MR. KHALILUR REHMAN MA B ED	GHS MAMA KHEL LA'KI MARWAT	1992	15.10.1952	ZONE IV	14.04.1981	23.05.1995	
127	MR. SYED LAZ HUSSAIN MA B ED	GMS PULACHI WALA D I KHAN	1992	9.1.1951	D I KHAN	21.10.1985	23.05.1995	
128	MR. BASHIR KHAN BED	GHS MALAKAND AGENCY	1992	20.03.1952	MALAKAND	24.11.1985	23.05.1995	
129	MR. MOMIN KHAN SST MA B ED	GMS MUHAMMAD AKBAR KHAN TANK	1992	20.11.1952	D I KHAN	26.04.1973	23.05.1995	
130	MR. KHAN ZAMAN SST MA B ED	GHS NANGU HANGU	1992	5.1.1960	KARAK	12.1.1980	23.05.1995	
131	MR. AWAL YAZ SST MA B ED	GHS NARYAB KOHAT	1992	9.11.1952	KARAK	14.10.1976	23.05.1995	
132	MR. SHAHID HAYAT SST MA B ED	GHS ZERAT ALLAHAD KOHAT	1992	1.1.1959	KARAK	11.12.1980	23.05.1995	
133	MR. AMAN ULLAH KHAN SST MA B ED	GHS KIFI HAIDER TANK	1992	1.4.1952	BANNU	2.11.1980	23.05.1995	
134	MR. JAMSHED NAWAZ SST MA B ED	GHS PAI TANK	1992	8.10.1959	D I KHAN	6.11.1986	23.05.1995	
135	MR. MUHAMMAD ZAFRAN SST MA B ED	GMS DRAND KOHAT	1992	17.04.1962	KARAK	29.11.1981	23.05.1995	
136	MR. ABDUL HAMID SST MA B ED	GHS USTARZAI BALA KOHAT	1992	1.2.1960	KOHAT	7.12.1981	23.05.1995	
137	MR. SAFEERULLAH SST MA B ED	GHS TCPA STANA KOHAT	1992	17.08.1962	D I KHAN	13.01.1987	23.05.1995	
138	MR. SARWAR KHAN SST MA B ED	GHS JABBAR	1992		KARAK	13.10.1973	23.05.1995	
139	MR. FARHATULLAH SST MA B ED	GHS HAFANA SWABI	1992	1.5.1956	SWABI	10.2.1986	23.05.1995	
140	MR. MUHAMMAD RAHMAN SST MA B ED	GHS KOTHA SWABI	1992	12.12.1957	MARDAN	13.11.1975	23.05.1995	
141	MR. HAKIM SST	GHS RAHANKOT DIR	1992		DIR	1.9.1966	23.05.1995	
142	MR. RAFIQ AHMAD SST	GHS KAD	1992	1.1.1958	DIR	18.03.1975	23.05.1995	
143	MR. MUHAMMAD SIRAJ SST	GHS AMNORI	1992	4.4.1958	SWAT	15.12.1976	23.05.1995	
144	MR. MUTABAR SHAH S O SIFFAT GUL SST	GHS MALAK ABAD SWABI	1992	4.1.1958	SWABI	17.12.1980	23.05.1995	
145	MR. ALI HAIDER SST MA B ED	GHS DHERAI SWAT	1992	19.04.1959	SWAT	17.01.1982	23.05.1995	
146	MR. ABDULLAH SST	GMS KABILGRAM	1992	1.2.1959	SWAT	13.11.1979	23.05.1995	
147	MR. GUL RAUF KHAN SST BA B ED	GHS	1992	3.5.1961	FR BANNU	8.1.1983	23.05.1995	
148	MR. GHULAM SERWAR	GHS TAKHTBAI	1992	3.12.1957	MARDAN	25.11.1985	23.05.1995	
149	MR. RASHID MEHMOOD	GHS KAKOTRI	1992	10.2.1960	ABBOTTABAD	3.10.1983	23.05.1995	
150	MR. ZAHID ALI	GHS KRIFION	1992	2.4.1964	HARIPUR	9.9.1982	23.05.1995	
151	MR. TARIQ MAHMOOD	GHS	1992	20.11.1961	HARIPUR	12.6.1985	23.05.1995	
152	MR. MOHIBULLAH MA B ED	GHS BAFIN DIR	1992	9.2.1966	DIR	19.02.1991	23.05.1995	
153	HUSSAIN AHMAD SST MA B ED	GHS SHAH NOOR PULL MARDAN	1992	01.01.1961	MALAKAND	05.02.1986	23.05.1995	
154	MR. MUHAMMAD SHAKIR TANQOLI BA	GHS SWABI	1992	21.03.1956	SWABI	24.09.1988	23.05.1995	
155	MR. MUNSIF KHAN SST MA B ED	GMS BAF DALGRAM MANSEHRA	1992	15.04.1961	MANSEHRA	5.6.1985	23.05.1995	
156	MR. ABDUR RASHID MA B ED	GMS LAZDOR	1992	10.1.1960	ABBOTTABAD	14.10.1985	23.05.1995	
157	MR. MUHAMMAD SHER KHAN S O M. ZAIB MA B ED	GHS MATTA SWAT	1992	7.7.1961	SWAT	12.10.1986	23.05.1995	FOREGONE PROMOTION
158	MR. RUSTAM KHAN SST	GHS LA'HALA	1992	1.6.1958		1.5.1995	23.05.1995	
159	MR. MUHAMMAD MISKIN MA B ED	GHS SURJAL ABBOTTABAD	1992	15.04.1963	BATTAGRAM	1.6.1988	23.05.1995	
160	MR. MUHAMMAD ASLAM MED	GHS SHIVASHTO FR PESHAWAR	1992	10.1.1960	FR PESHAWAR	18.03.1978	23.05.1995	
161	MR. WASIULLAH MA B ED	GHS SULEMAN KHWAR MOH AGY	1992	10.4.1952	MALAKAND	6.10.1980	23.05.1995	
162	MR. MUHAMMAD HAROON SST MA B ED	GHS CHAMIAL MANSEHRA	1992	15.03.1952	MANSEHRA	5.3.1983	23.05.1995	
163	MR. PARVEZ KHAN SST MA B ED	GHS TULLA	1992	21.05.1952	MANSEHRA	12.3.1983	23.05.1995	
164	MR. PARVEZ KHAN SST MA B ED	GHS MATTA PANI	1992	15.01.1959	ABBOTTABAD	16.03.1983	23.05.1995	
165	MR. WAZIR RAHMAN MA B ED	GHS	1992	21.12.1958	FR PESHAWAR	2.2.1978	23.05.1995	
166	MR. AFZAL KHAN MA B ED	GHS	1992	15.05.1959	FR PESHAWAR	14.07.1986	23.05.1995	

ASST. COMMISSIONER

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S.No	Name & Qualification	School/Office	Year of B Ed	Date of Birth	Domicile	Date of Ist. Appnt./In Edu Deptt.	DTG of Appoint./Appr of SET	Remarks
167	SYED AEDUS SAJJAR SHAH SST MA BED	GHSS NO 1 PESHAWAR CANTT	1991	21.02.1962	PESHAWAR	1.10.1983	23.05.1995	
168	MR ABAS KHAN SST BA BED	GHSS BANNU	1991	12.2.1964	BANNU	8.9.1988	23.05.1995	
169	MR AZHAR RAHMAN MA B ED	AAED LANDI KOTAL KHY AGY	1991	25.02.1961	KURRAM AGENCY	15.10.1980	23.05.1995	
170	MR FAZ MUHAMMAD MA BED	GHS PARANG GHAR	1991	24.1960	MALAKAND	2.10.1992	23.05.1995	
171	MR MUHAMMAD SHAFIQ MA B ED	GHS Papp. Khel SWA	1991	15.03.1960	SWA	15.04.1981	23.05.1995	
172	MR AWAN ULLAH KHAN MA B ED	GMS ABDUR REHMAN FR BANNU	1991	30.06.1964	FR BANNU	24.04.1983	23.05.1995	
173	MR M. SAFAR KHAN MA B ED	GHS Dherakai Bajour Agency	1991	5.1.1961	BAJOUR AGENCY	16.07.1987	23.05.1995	
174	MR M. TABAR KHAN MA B ED	GHS	1991	24.1960	FR BANNU	31.10.1983	23.05.1995	
175	MR ZAHED ULLAH SST MA B ED	GHS GHANI KORONA MOH AGY	1991	13.04.1958	MALAKAND	01.09.1977	23.05.1995	
176	MR MASOOD AZHAR BA BED	GHS MOHAMMAD KHEL FR BANNU	1991	22.03.1960	FR BANNU	1.12.1984	23.05.1995	
177	MR AEDUR REHMAN BA BED	GHS SHAWA NWA	1991	4.11.1956	FR BANNU	11.02.1978	23.05.1995	
178	MR ISANULLAH BA BED SST	GHS FARIDI (FR-PESHAWAR)	1991	25.05.1961	FR KOHAT	01.01.1981	23.05.1995	
179	MR SA MUHAMMAD SST		1991	14.1959	SWAT	1.11.1986	23.05.1995	
180	MR MUHAMMAD ZAHID SST		1991	5.6.1958	CHARSADDA	25.10.1986	23.05.1995	
181	MR FAZILLAH MA B ED SST	GHS EIDAK N WA	1991	10.1.1969	NWA	3.10.1988	23.05.1995	
182	MR FAZIL KHAN MA MED	GHS NO.4 MINGORA SWAT.	1991	1.11.1962	SWAT.	19.12.1982	23.05.1995	
183	MR JAHAR ALI	GHS TOTAJAI BUNER	1991	10.1.1960	DIR	8.10.1983	23.05.1995	
184	MR SAMULLAH MA B ED SST	GHSS S.K. BALA BANNU.	1991	25.06.1964	BANNU	25.09.1992	23.05.1995	
185	MR AFZAL KHAN MA B ED SST	GMS GARYUM NWA	1991	25.1963	FR BANNU	17.12.1981	23.05.1995	
186	MR NARA KHAN MA B ED	GHS	1991	3.3.1963	KOHAT	7.11.1985	23.05.1995	
187	MR M. DARIS KHAN MA B ED SST		1991	4.8.1960	FR BANNU	3.10.1980	23.05.1995	
188	MR MUHAMMAD YAS	GHS WAJIR BAGH PESHAWAR.	1991	15.12.1964	PESHAWAR	12.01.1987	23.05.1995	
189	MR AEDUR BAKSH KHAN BA BED	GHS NO.1 BANNU	1991	25.1964	BANNU	16.09.1980	23.05.1995	
190	MR SAJID IQBAL	GHS KHARIAN	1991			12.11.1986	23.05.1995	
191	MR M. FA KHAN MA MED	GHS TAJKI ISMAIL KHAL	1991	13.1963	FR KOHAT	7.11.1985	23.05.1995	
192	MR NASEEB ALI SHAH BA BED	GHS MATURA LAKKI MARWAT	1991	6.1.1958	BANNU	16.11.1982	23.05.1995	
193	MR SAQIB MUHAMMAD MA B ED	GHS SIKANDARI MARDAN	1992	12.12.1960	MARDAN	18.10.1984	23.05.1995	
194	MR ASDUL HAJI	GHS SHANGLAI PAYAN	1992	12.1963		9.2.1987	23.05.1995	
195	MUHAMMAD ZAMAN SST BA BED	GHS PATTAN KHURD ABBOTTABAD	1992	15.1960	ABBOTTABAD	13.10.1985	23.05.1995	
196	MR IMAN MAHAR JAN	GHS No.1 Mingora SWAT	1992	15.1960	SWAT	7.12.1988	23.05.1995	
197	MR SHEER MUHAMMAD MSC BED	GHS KOWIA	1993	15.03.1965		1.11.1980	23.05.1995	
198	MR TAFIQ AHMAD KHAN	GHS NO 2 HAVALIAN	1993	4.5.1963	ABBOTTABAD	15.10.1988	23.05.1995	
199	MR M. NAWAZ KHAN	GHS	1993	15.1966	DIR	17.12.1989	23.05.1995	
200	MR FARANG ZEE BA BED	GHS CHING GOLI BUNER	1993	14.05.1963	BUNER	18.02.1990	23.05.1995	
201	MR JAMIL KHAN BA BED	GHS DHINDA	1993	22.1963		28.05.1990	23.05.1995	
202	MR RAFIQAT AL KHAN	GHS SIALBAT	1993			17.10.1989	23.05.1995	
203	Mrs. Farhan SST MA B ED	GHS BAKA KHEL BANNU	1993	12.2.1965	BANNU	09.09.1989	23.05.1995	
204	MR GULAM SHAH MSC BED	GMS GHUNDAI SHEIKHAN FR DI KHAN	1993	20.12.1967	FR DI KHAN	31.12.1994	23.05.1995	
205	MR HASEEB ULLAH MSC BED	GHS	1993	15.1963	FR BANNU	19.09.1989	23.05.1995	
206	MR HAFIZ ALI MA B ED	GHS BORKI KURRAM AGENCY	1993	15.1966	KURRAM AGENCY	20.01.1990	23.05.1995	
207	MR SAJJAD HOOR MA B MSC BED		1993	4.1.1965	NWA	20.10.1994	23.05.1995	
208	MR M. AHMAD SAMAM BSC B ED	GHS MOHAMMAD NARI CHARSADDA	1993	12.1967	MOHAMMAD AGENCY	14.12.1989	23.05.1995	
209	MR EAD SHAH NEER SST BA BED	GHS KOT ATAL SHARIF	1993	12.12.1966		24.09.1984	23.05.1995	
210	MR SAJJAD ALI MA B MSC BED	GHS BEAR HARIPUR	1993	11.4.1967	HAZARA	3.11.1992	23.05.1995	
211	MR ISMAIL KHAN SST MA B ED	GHS SURGUL KOHAT	1993	12.1961	KOHAT	10.12.1987	23.05.1995	
212	MR SHEER BADSHAH MA B ED	GHS ALIZAI KURRAM AGENCY	1993	21.1962	FATA	20.10.1981	24.05.1995	

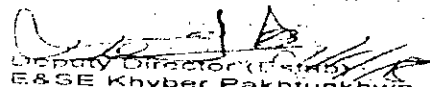
(Handwritten signature)

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S.No	Name and Qualification	School/Office	Year of B.Ed	Date of Birth	Residence	Date of Ist. Apptt. in Edu Deptt.	Date of Appointt./Appr of SET	Remarks
5105	MUHAMMAD ISHFAQ KHAN MA MED	GHS DHEENDHA	2011	10.5.1975	PIPIUR	17.09.1986	03.01.2012	
5106	MUHAMMAD ASHRAF SST BA BED	GHS AHL MANSEHRA	2008	13.04.1969	MANSEHRA	08.05.1999	08.03.2012	
5107	MUHAMMAD BASHIR SST MA BED	MANSEHRA	2008	02.03.1979	MANSEHRA	17.03.2012	17.03.2012	
5108	FAZAL WAHID SST MA BED	BUNER	2008	27.02.1975	BUNER	17.03.2012	17.03.2012	

CERTIFICATE:

It is certified that the Seniority List is Final, Undisputed & not Subject to any Court.


Deputy Director (Training)
E&SE Khyber Pakhtunkhwa
PESHAWAR
17/1/2018

Amir C.

15

The Secretary Education,
(Elementary & Secondary Education),
Govt. of Khyber Pukhtoonkhwar, Peshawar.

Sub:- APPEAL AGAINST THE INCORRECT ENTRY OF THE APPELLANT'S SENIORITY IN THE FINAL SENIORITY LIST OF SENIOR SCIENCE TEACHER(SSTs) AS IT STOOD ON 1.1.2018.

Respected Sir,

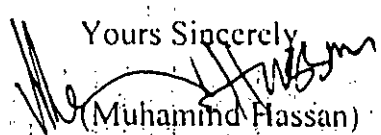
The appellant submits as follow:-

- 1- That the appellant is an employee of Education Deptt., presently posted as SST(Tech) at GHS, Sur Kamar, Khyber Agency.
- 2- That the appellant was appointed as SET(Technical) in the education Deptt. on 6.4.1982, and his services were confirmed vide order dated 4.11.1982. The same is reflected in the notification dated 21.03.2009 issued by your good office(Copy annexure A).
- 3- That the Directorate of Elementary & Secondary Education, KPK has issued final seniority list of SSTs wherein the appellant's date of appointment as regular SET(serial No.6) has been wrongly mentioned as 16.10.1991 instead of 4.11.1982. (Copy of Seniority list is annexure B).
- 4- That aggrieved of the same the appellant approach your goodself to redress his grievance.

It is, therefore, most humbly prayed that on acceptance of this appeal, the appellant's seniority in the final seniority list of SSTs as it stood on 1.1.2018 may very kindly be corrected and as a consequential relief the appellant's date of appointment as regular SET be corrected as 4.11.1982 instead of 16.10.1991.

The appellant shall be highly obliged for this favour on your part.

Dated 30-1-2018

Yours Sincerely

(Muhammad Hassan)
S/O Haji Malik Jabbar,
SST, GHS, Sur Kamar,
Khyber Agency



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL.

SERVICE APPEAL NO. 748/2018

**Mr. Muhammad Hassan SET Technical GHSS Jamrud Tribal
District KhyberAppellant.**

Versus

- 1. Secretary to Govt. of KPK Elementary & Secondary Education
Department Peshawar.**
- 2. Director KPK Elementary & Secondary Education
Department Peshawar.**
- 3. Director Education new merged Districts..... Respondents.**

Parawise Comments on behalf of Respondent No. 3.

Preliminary objections.

- That the Appellant has got no cause of action, locus standi to file the instant Petition.
- That the appeal is not maintainable being devoid of merits.
- That the appellant has concealed material facts from honorable court.
- That the appellant has not come to this Court with clean hands.
- That the appellant case is badly time barred.
- That the appellant is estopped by his own conduct to bring the instant Petition.

Respectfully Shewith.

1. No comments. Pertains to record.
2. No comments. Relates to respondent No. 2. Director Education (new merged Districts respondents No. 3 has no power to interfere in the subject case as all sorts of works all of SET / S.S / Head Mater are dealt with by Director Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar. It is further submitted that the seniority list is being maintained by Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar, therefore the appellant may approach to Elementary and Secondary Education Department for the redressal of his grievances.
3. Incorrect. Respondents No. 3 has no relevancy with the subject case.
4. Incorrect. Relates to respondents No. 1.
5. No Comments. Hence denied.

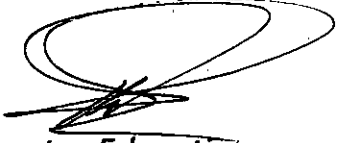
GROUNDS.

- A. *Incorrect. Relates to respondents No. 1 & 2.*
- B. *Incorrect. Respondents No. 3 is not principal respondent in the subject case.*
- C. *No comments. Pertain to record.*
- D. *No comments. Relates to respondent No. 1 & 2.*
- E. *As explained in para -D above.*
- F. *Respondents are also seeks permission to advance the grounds and proofs at the time of arguments.*

Pray.

In the light of above factual position it is humbly prayed that the appeal in hand may very graciously be dismissed having no legal grounds.

Respondent No.3




**Director Education new
merged Districts**

AFFIDAVIT

I, the above respondents, do hereby solemnly affirm and declare, that the contents of the comments are true and correct to the best of my knowledge and belief that nothing has been concealed from this Honorable Court

Respondent No. 3



**Director Education
New merged Districts**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL.

SERVICE APPEAL NO. 748/2018

Mr. Muhammad Hassan SET Technical GHSS Jamrud Tribal
District KhyberAppellant.

Versus

1. Secretary to Govt. of KPK Elementary & Secondary Education Department Peshawar.
2. Director KPK Elementary & Secondary Education Department Peshawar.
3. Director Education new merged Districts..... Respondents.

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Preliminary objections.

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- That the appeal is not maintainable being devoid of merits.
- That the appellant has concealed material facts from honorable court.
- That the appellant has not come to this Court with clean hands.
- That the appellant case is badly time barred.
- That the appellant is estopped by his own conduct to bring the instant Petition.

Respectfully Shewith.

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3. Incorrect. Respondents No. 3 has no relevancy with the subject case.
4. Incorrect. Relates to respondents No. 1.
5. No Comments. Hence denied.

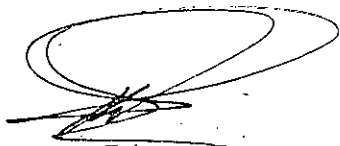
GROUNDS.

- A. Incorrect. Relates to respondents No. 1 & 2.
- B. Incorrect. Respondents No. 3 is not principal respondent in the subject case.
- C. No comments. Pertain to record.
- D. No comments. Relates to respondent No. 1 & 2.
- E. As explained in para -D above.
- F. Respondents are also seeks permission to advance the grounds and proofs at the time of arguments.

Pray.

In the light of above factual position it is humbly prayed that the appeal in hand may very graciously be dismissed having no legal grounds.

Respondent No.3




Director Education new
merged Districts

AFFIDAVIT

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Respondent No. 3



Director Education
New merged Districts

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL.

SERVICE APPEAL NO. 748/2018

Mr. Muhammad Hassan SET Technical GHSS Jamrud Tribal District KhyberAppellant.

Versus

- 1. Secretary to Govt. of KPK Elementary & Secondary Education Department Peshawar.**
- 2. Director KPK Elementary & Secondary Education Department Peshawar.**
- 3. Director Education new merged Districts..... Respondents.**

Parawise Comments on behalf of Respondent No. 3.

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- That the appellant has not come to this Court with clean hands.
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- That the appellant is estopped by his own conduct to bring the instant Petition.

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1. No comments. Pertains to record.
2. No comments. Relates to respondent No. 2. Director Education (new merged Districts respondents No. 3 has no power to interfere in the subject case as all sorts of works all of SET / S.S / Head Mater are dealt with by Director Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar. It is further submitted that the seniority list is being maintained by Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar, therefore the appellant may approach to Elementary and Secondary Education Department for the redressal of his grievances.
3. Incorrect. Respondents No. 3 has no relevancy with the subject case.
4. Incorrect. Relates to respondents No. 1.
5. No Comments. Hence denied.

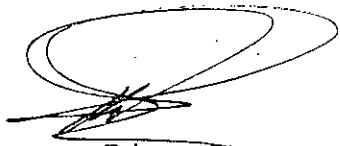
GROUNDS.

- A. Incorrect. Relates to respondents No. 1 & 2.
- B. Incorrect. Respondents No. 3 is not principal respondent in the subject case.
- C. No comments. Pertain to record.
- D. No comments. Relates to respondent No. 1 & 2.
- E. As explained in para -D above.
- F. Respondents are also seeks permission to advance the grounds and proofs at the time of arguments.

Pray.

In the light of above factual position it is humbly prayed that the appeal in hand may very graciously be dismissed having no legal grounds.


Respondent No.3


Director Education new
merged Districts

AFFIDAVIT

I, the above respondents, do hereby solemnly affirm and declare, that the contents of the comments are true and correct to the best of my knowledge and belief that nothing has been concealed from this Honorable Court

Respondent No. 3


Director Education
New merged Districts

27

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

Service Appeal No: 748/2018

Muhammad Hassan SST(G) GHS Sur Kamar, Jamrud Khyber Agency.....Appellant.

VERSUS

Secretary E&SE Department, Khyber Pakhtunkhwa and others.....Respondents

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

Respectfully Sheweth :-

The Respondents submit as under:-

PRELIMINARY OBJECTIONS.

- 1 That the Appellant has got no cause of action locus standi.
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal in the instant service appeal.
- 4 That the instant Service Appeal is against the relevant provisions of law.
- 5 That the appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the instant appeal is liable to be dismissed for mis-joinder & non-joinder of the necessary parties to the present appeal.
- 7 That the appellant is estopped by his own conduct to file the instant appeal.
- 8 That the instant Service Appeal is not maintainable in the present form & circumstances of the case.
- 9 That the instant Appeal is barred by law.
- 10 That the impugned seniority list dated 01/01/2018 is within legal sphere.
- 11 That the appellant has been inducted against the SET/SST(G) Post vide appointment order dated 06/4/1982 & has passed his B. Ed in 1991, which is the date for the grant of seniority on 16/10/1991 as per rules & criteria by the Respondent Department.
- 12 That the appellant is not entitled for the grant of seniority wef 04/11/1982 as he has been appointed as an un-trained SST in the Respondent Department & has been awarded seniority wef 16/10/1991 after passing his B. Ed Examination.

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FACTS.

- 1 That Para-I, is incorrect & misleading on the grounds that as per the impugned seniority list as stood on 01/01/2018, the appellant was appointed against the SET/SST as an untrained SET/SST (M) teacher & he has passed his B Ed examination on 16/10/1991 from where he has been awarded seniority against the said post. Hence, the plea of the appellant regarding his confirmation against the mentioned post on 04/11/1982 is baseless & is liable to be dismissed. **(Copies of the Notification dated 01/01/2018 & final seniority list of the same date are attached as annexure A&B).**
- 2 That Para-2 is also incorrect & denied. The appellant was appointed against the SET/SST post vide appointment order dated 06/4/1982 & has passed his B. Ed on 16/10/1991 from where, the appellant has been regularized against the said post in the Respondent Department in accordance with the mandatory provisions of Section of Civil Servants Act 1973. Hence, the stand of the appellant is baseless & without any cogent reason & justification.
- 3 That Para-3 is incorrect & denied. No Departmental Appeal against the impugned seniority list dated 01/01/2018, has been filed by the appellant to the Respondents. Hence, the said seniority list has got finality in all respect against the appellant.
- 4 That Para-4 is incorrect & denied. The Respondents have acted as per law, rules & criteria for the grant of seniority to the appellant after acquiring the prescribed qualification of B. Ed.
- 5 That Para-5 is also incorrect & misleading. The Respondents have acted as per law, rules & criteria by allowing seniority to the appellant wef 16/10/1991 which is the date of his passing B Ed examination. Hence, the appeal; in hand is liable to be dismissed on the following grounds inter alia:-

GROUND.

- A Incorrect & denied. The impugned final seniority list as stood on 01/01/2018 is legally competent & is liable to be maintained.
- B Incorrect & denied. The stand of the appellant is baseless as he was appointed as an untrained SET teacher vide order dated 04/11/1982 & later on, he has passed his B. Ed examination on 16/10/1991 from where he has been allowed seniority against the said post by the Respondent Department under cited provisions of law, rules & criteria.
- C Incorrect & misleading. The appellant is not entitled for the grant of seniority against the SST/SET post for untrained period & has been made entitled for the grant of the same wef 16/10/1991 on which he has acquired the prescribed qualification of B.Ed.
- D Incorrect & denied. The stand of the appellant is without any cogent proof & justification in view of the foregoing discussion in the instant reply on behalf of the Respondents by allowing seniority wef 16/10/1991 after passing B Ed examination to the appellant against the SET/SST Post in (BPS-16).
- E Incorrect & denied. The stand of the appellant is without cogent reason & justification as the Respondents have acted as per law & rules by the awarding the seniority to the appellant from his due date of 16/10/1991 under the relevant provisions of law after acquiring B. Ed qualification.


26
Legal. However, the Respondents seek leave of this Honorable Tribunal to submit additional grounds/case law & record at the time of arguments on main appeal on the date fixed.

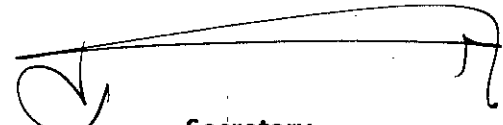
PRAYER

In view of the above made submissions, it is most humbly prayed that this Honorable, Tribunal may very graciously be pleased to dismiss the instant Service Appeal with cost in favour of the Respondent Department.

Dated ___/___/2018

Director Education (FATA)
FATA Secretariat Khyber Pakhtunkhwa
Peshawar.
(Respondent No: 3)


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


Secretary
Govt: of Khyber Pakhtunkhwa,
E&SE Department Peshawar
(Respondent No: 1)

AFFADIVIT

I, Hameed ur Rehman, Asstt: Director (Lit: II) Directorate of E&SE Department Khyber Pakhtunkhwa, Peshawar is hereby solemnly affirm & declare on oath that the contents of the instant Joints Parawise Comments are true & correct to the best of my knowledge.


Deponent

17/11/2018
 Director, Secondary Education
 Khuzdar District Education Office
 Khuzdar

1. Director, Education & Training, Khuzdar District Education Office, Khuzdar.
 2. Director, Education, Khuzdar District Education Office, Khuzdar.
 3. Director, Education, Khuzdar District Education Office, Khuzdar.
 4. Director, Education, Khuzdar District Education Office, Khuzdar.
 5. Director, Education, Khuzdar District Education Office, Khuzdar.
 6. Director, Education, Khuzdar District Education Office, Khuzdar.
 7. Director, Education, Khuzdar District Education Office, Khuzdar.
 8. Director, Education, Khuzdar District Education Office, Khuzdar.
 9. Director, Education, Khuzdar District Education Office, Khuzdar.
 10. Director, Education, Khuzdar District Education Office, Khuzdar.

File No. 15/2018
 Dated: 17/11/2018

Director,
 Khuzdar District Education Office,
 Khuzdar

The undersigned has conferred with the Sub-Section Officer, Khuzdar District Education Office, Khuzdar, and the same has been approved.

NO. 50(S)/MBS/SD/4-24/2018/RSL
 GMR-10

ANN
 (A)

Director, Khuzdar District Education Office,
 Khuzdar
 Phone No. 09221069, 0910970
 Fax No. 09221069
 E-mail: khuzdar@kdp.gov.pk



22

10/11/94

25

LIST OF TEACHERS OF B.A. SCIENCE, ECONOMICS AND COMMERCE OF GOVT. HIGHER SECONDARY SCHOOLS (B.A. SCIENCE) PAKISTAN WAS 1994

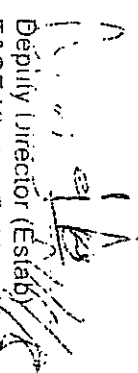
S.No	Name and Qualification	School/City	Year of B.Ed	Date of Birth	District	Date of Issr. Appoin Edu Deptt;	T/n of Appoint/ Appr of SET	Remarks
1	2	3	4	5		6	7	8
1	ABDUL WAHEED SST (TECH) MA MED (TECH. TECH)	GMS CHANI MALWANA D.I KHAN	1988	08.01.1965	D.I KHAN	09.03.1988	09.03.1988	
2	MUHAMMAD AYUB SST (TECH)	GCHHS NO.1 D.I KHAN	1988	20.10.1963	D.I KHAN	15.12.1985	29.03.1986	
3	MR. WAJEEH GUL SST MA EDUCATION	GHS BACH BAN PORA AKORA THALIAN	1989	26.02.1960	NOWSHERA	19.1982	12.11.1990	
4	ZAKIR ULLAH SST (TECH)	GHS BAGHDADA MARDAN	1990	02.01.1964	MARDAN	27.12.1990	27.12.1990	
5	ISRAJ KHAN SST TEACHER	GHS TAKHT BHAI MARDAN	1988	30.11.1959	MARDAN	17.01.1991	17.01.1991	
6	MUHAMMAD HASSAN SST (TECH)	GHS SUR KAMAR KHYBER AGENCY	1991	16.05.1959	NWA	06.04.1982	16.10.1991	
7	MUHAMMAD SALEEM SST (TECH)	GHS NO.1 MINGOKA SWAI	1991	06.05.1960	SWAI	18.5.1982	16.10.1991	
8	TECH. TECH	GHS NO.1 HARIPUR	1991	06.01.1962	HARIPUR	26.09.1983	16.10.1991	
9	MUHAMMAD ISMAIL SST	GHS NO.2 BANNU	1991	12.04.1965	FR BANNU	15.10.1991	13.10.1991	
10	MUHAMMAD ISMAIL SST	GHS NO.2 BANNU	1991	08.04.1964	FR BANNU	19.06.1985	16.10.1991	
11	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
12	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
13	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
14	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
15	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
16	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
17	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
18	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
19	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
20	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
21	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
22	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
23	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
24	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
25	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
26	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
27	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
28	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
29	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
30	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
31	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
32	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
33	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
34	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
35	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	
36	MUHAMMAD ISMAIL SST	GHS KHURAI D.I KHAN	1993	15.06.1963	D.I KHAN	18.11.1987	15.12.1987	

10/11/94

CERTIFICATE

It is certified that the Security List is Final, Un disputed & not Subjective in any Court.

Sl. No.	Name	Rank	Service No.	Joining Date	Relief Date	Remarks
5106	MUHAMMAD SHAN ULLAH	CHS DHEENHA	2311	12.6.1985	17.09.1985	
5107	MUHAMMAD ASHRAF SSI BA BED	CH AH MANSEHRA	2008	11.04.1989	09.05.1999	
5108	MUHAMMAD ASHRAF SSI MA BED	CH HRA	2008	02.03.1979	17.03.2012	
	FIZAI WALID SSI MA BED	CH HRA	2003	10.1.1975	17.03.2012	


 Deputy Director (Establishment)
 E&SE Khyber Pakhtunkhwa
 Peshawar

11/1/2018

No. 5293 IC/Chashma Flour Mills dated Miranshah the 3/11/2008.

From The Political Agent,
North Waziristan Agency,
Miranshah.

To The Additional Chief Secretary,
FATA Secretariat Warsak Road,
Peshawar.

Subject: REQUEST FOR COMPENSATION/PROTECTION
OF LIFE & PROPERTY.

Memorandum:

Kindly refer to Section Officer Narcotics, Law & Order
Department FATA Secretariat Peshawar letter No.CS(F)/N/10/Comp:
NWA.663-66..dated 06.12.2008 on the subject cited above.

Facts are that Chashma Flour Mills Miranshah was
established in the year 1993 under license No.870/93, dated 8.11.1993 by
Haji Muhammad Rafique S/O Malik Haji Jabbar Khan Daur Miranshah
Tehsil Miranshah. It was functioning smoothly when in the year 2004 vide
No 765/9131, dated 19.6.2004 it was served with a notice by Assistant
Manager (Revenue) Operation TESCO FATA Bannu that an amount of
Rs.193870/- is outstanding against the Mills which was to be deposited by
the end of June 2004. Applicant did not give any heed to the notice and
remained engaged in litigations at various Forums. Resultantly TESCO
authorities had to disconnect power supply to the said Mills.

Any enquiry comprising Agency Accounts Officer,
Miranshah, (Chairman), Assistant Director LG & RIDD Miranshah
(Member) and Superintendent PA's Office Miranshah (Member) was
constituted vide No-457-62/APO/MRN, dated 6.5.2004 which gave its
findings vide No.914, dated 27.10.2004 and determined an amount of
Rs.4651521/- as unpaid bills liable to be deposited by the proprietor of
Chashma Flour Mills. Copies of enquiry report attached for perusal.

Then applicant Mr. Muhammad Rafique moved FCR
Tribunal NWFP Peshawar for relief against the TESCO dues and the case is

pending adjudication. The original case file have been sent to the Registrar
Tribunal FCR NWFP Peshawar vide No.295/APO/MRN, dated 07.7.2007
copy attached for ready reference. Power supply to the Mills remained
disconnected due to nonpayment of TESCO dues till now.

23

As alleged by the applicant that on 25.9.2008 he wanted to operate his Mills and approximately 1100-bags of wheat were lying in the Mills, when violent mob stormed the building and damaged Machinery and fixture etc causing damage of approximately Rs.4000000/- (Rupees, Forty Lacs only) to the applicant/owner. Local administration can not confirm the availability of wheat stored in his Flour Mills as no wheat was allocated to the Mills out of the sanctioned quota. However the building has been damaged along with Machinery by the people of Miranshah village. Moreover the occurrence has taken place in the Tribal Territory and according to REWAJ the Political Administration can not take cognizance of it.

The reason for the attack was that the owner of Chashma Flour Mills Malik Jabbar Khan, Father of Muhammad Rafique (applicant) was claiming the ownership of landed property known as Match Factory area (unsettled) whereas the people of Village Miranshah were considering the said land to the property of entire quom of village Miranshah. The applicant's family was reluctant to allow the distribution of land Match Factory area while the people of Miranshah are of the view that the Chashma Flour Mills has been built on disputed land. The issue has divided the people in to two groups i.e. Daur Miranshah Group and Matchas group. The issue is still un-resolved and various Jirgas have been held by the elders of area but no fruitful results have been achieved.

Submitted please.

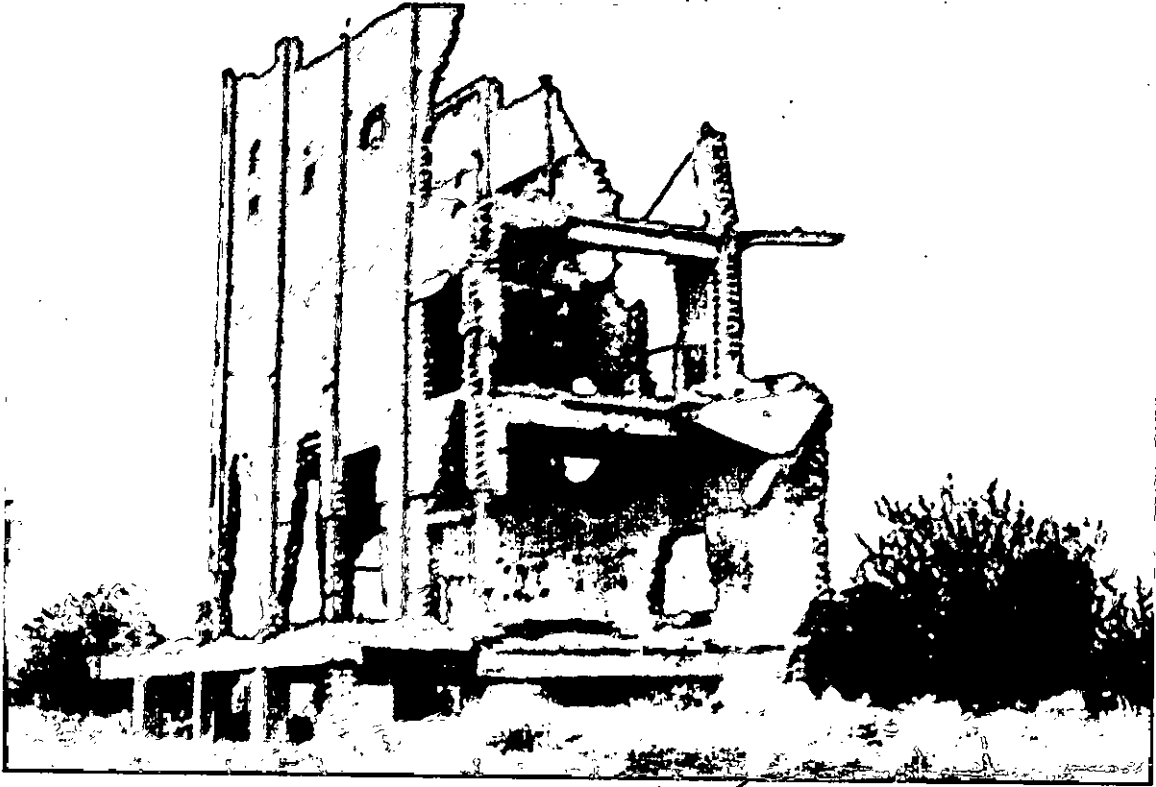
Political Agent,
Nokh Waziristan Agency,
Miranshah.

2008 سے لے کر

دستخط غلام علی شاہ

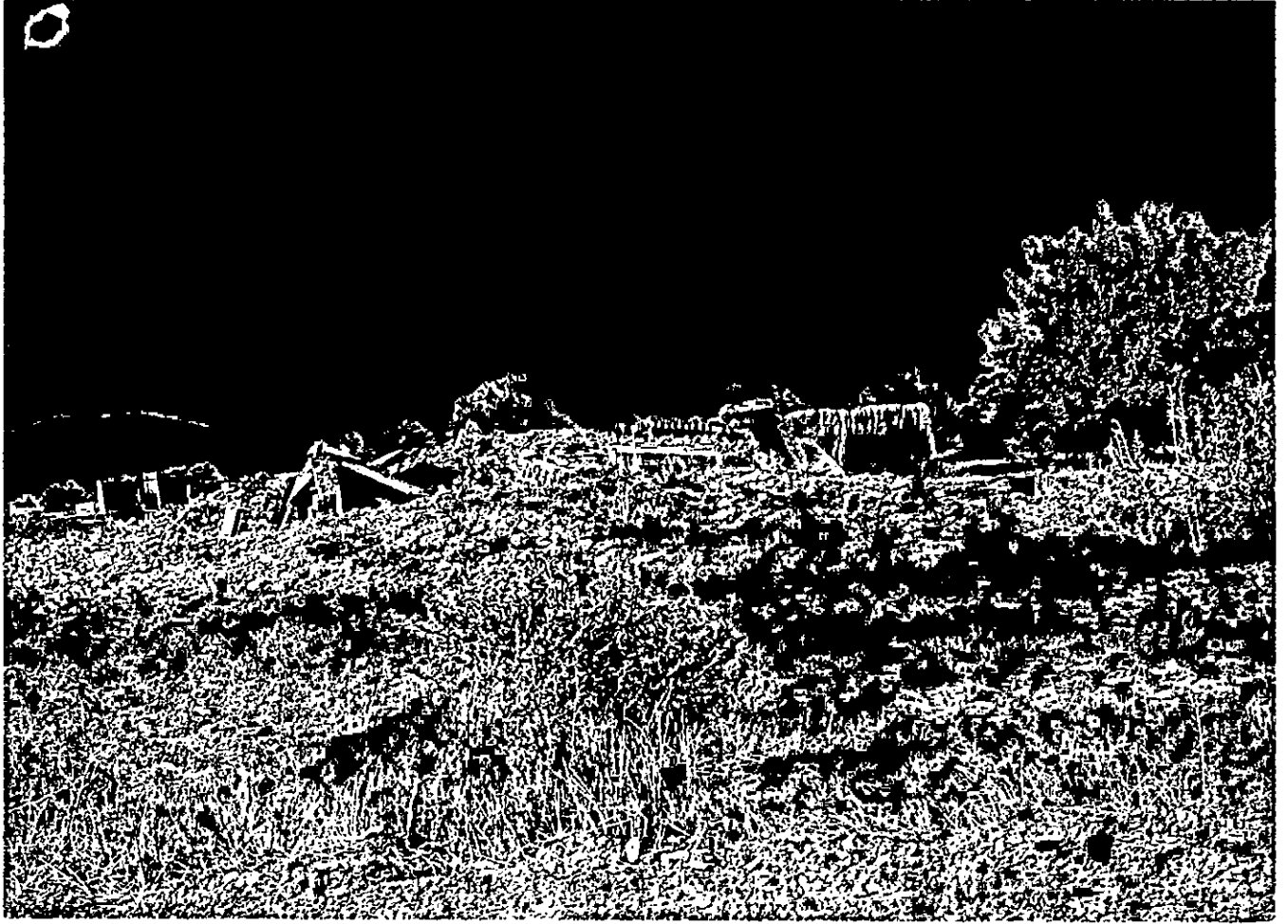
شمالی وزیرستان ایجنسی





2008 کے بعد

چشمہ فلور ملز و سٹارٹ اپ
شمالی وزیرستان ایجنسی



2016 مین

گورنور ملو، ملو، ملو
شمالی وزیرستان، پاکستان

9

NO. FD(SR.I)6-1/88.

31-3-88

GOVERNMENT OF NWFP,
FINANCE DEPARTMENT.

Dated Peshawar, the 31st March, 1988.

From:

The Secretary to
Government of NWFP,
Finance Department,
Peshawar.

TO:

- 1- All Administrative Secretaries to Government of NWFP.
- 2- All Commissioners of Divisions in NWFP.
- 3- All Heads of Attached Departments in NWFP.
- 4- All Deputy Commissioners/Political Agents/
District and Session Judges in NWFP.
- 5- The Registrar, Peshawar High Court, Peshawar.
- 6- The Secretary to Governor, NWFP.
- 7- The Secretary, Public Service Commission, NWFP.
- 8- The Registrar, Services Tribunal, NWFP.

SUBJECT: REDESIGNATION OF THE POSTS OF ASSISTANT WORKSHOP
INSTRUCTOR AND WORKSHOP INSTRUCTOR AS J.E.T(TECH.),
AND S.E.T.(TECH.) IN THE EDUCATION DEPARTMENT.

Sir,

I am directed to refer to the above noted subject and
to state that the Schedule enumerated in this Department Circular
letter No. FD(SR.I)2-45/75, dated 25.3.1987 may be read as under

EDUCATION DEPARTMENT:

Sl. No.	Name of Post.	Existing RNPS.	B.P.S.
1-	Assistant Workshop Instructor (to be redesignated as Jr. English Teacher(Tech.)).	1) RNPS-8 ii) 30% of the Cadre strength to be in RNPS-11 on regular basis w.e. from 1.7.1982.	B-9 with Selection Grade equal to 1/3rd posts in B-12.
2-	Workshop Instructor (To be redesignated as Senior English Teacher(Tech.)).	1) RNPS-14 ii) 30% of the Cadre strength to be in RNPS-16 on regular basis w.e. from 1.7.1982.	B-15 with Selection Grade equal to 1/3rd posts in B-17.

Your obedient servant,

[Signature]

E

13

03-07-94

Government of NWFP
 Esta Department

Notification

No.So(S)6-8/90 CT. In pursuance of the provisions contained in sub-rule (2) of rule 3 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer Rules, 1989, the Education Department, in consultation with Services and General Administration Department and the Finance Department, hereby directs that in this Department Notification No.Agr Tech/1-14/81 Rules C.T, dated 28.12.1983, the following amendments shall be made namely:-

AMMENDMENTS:

In the appendix:-

- (a) In column 2 against serial No.2, or the words Vocational Subject Teachers", the words "Senior English Teacher (Technical)/workshop Instructor, shall be substituted; and
- (b) In column 3, against serial No.2(), for the existing entries, the following shall be substituted, namely;
- (a) B.Tech. from a recognized University/Institute;
 OR
- (b) Secondary School Certificate from a recognized Board with:-
- (I) Post-Matric Diploma polytechnica Institute/equivalent qualification of Industrial Arts plus Vocational Teachers Govt. Agro- Technical Teachers Training Centre; or
- (II) Two years certificate in Industrial Arts Education from Government Technical Teachers College, Faisalabad plus two years Diploma in Industrial Arts Education from the Government Teachers Training College, Faisalabad.
 OR
- (c) Higher Secondary School Certificate from a recognized board with two years' certificate in Industrial Arts Education from Govt. Technical Teacher Training College Faisalabad, plus Vocational Teachers Training Diploma in Industrial Arts from Government Agro-Technical Teachers Training Centre.

SECRETARY TO GOVT. OF NWFP

EDUCATION DEPARTMENT.

Endst:No.So(S)6-8/90. Dated Peshawar, the 3rd July 1994.

Copy forwarded to the :-

- 1-3. Secretaries to Government of NWFP S&GAD, Finance & Law Department.
4. Director of Secondary Education NWFP Peshawar.
5. Director of Education (FATA) NWFP Peshawar.
6. All Divisional Directors in NWFP.
7. Manager Government Printing Press NWFP Peshawar.
8. Accountant General NWFP Peshawar.

(MUHAMMAD ILYAS)

Section Officers (Schools)

B

10

20-4-88

Directorate of Education,
FATA, N.W.F.P., PESHAWAR.

NOL _____ / Trg/Agro-Tech:

Dated Peshawar the 20/4 1988

To

The Principal,
Government College of Technology,
Peshawar.

Subject:- ADMISSION TO ONE YEAR BACHELOR OF TECHNOLOGY PASS COURSE .
MEMO:

I am directed to forward herewith an application alongwith related documents in respect of Mr. Mohammad Hussain W.I G.H.S, Miranshah (N.W.Agency) for consideration on merit.

[Signature]
Asstt: Director (Trg/Ext),
For/Director of Education,
FATA, N.W.F.P., Peshawar.

Endst: No. 16358-57 Trg/

GROUND → B

- 1) ✓ Copy forwarded to the Head Master, G.H.S, Miranshah N.W.A, with reference to his Endst: No. 78 dated 19-4-88, with the remarks that the above noted W.I of ~~the school~~ will not claim for the post after the completion of the course.
- 2) P. A, to D. E. (F A TA), N.W.F.P., Peshawar.

[Signature]
Asstt: Director (Trg/Ext),
For/Director of Education,
FATA, N.W.F.P., Peshawar.

C

31-8-88

REGISTERED.

DIRECTORATE OF EDUCATION,
FATA, N.W.F.P. PESHAWAR.

NO. 36547 /A-12/M.Hassan.

Dated Pesh; the, 31/8 /88.

To,

The Headmaster,
GHS, Miranshah, (NWA).

Subject: GRANT-OF STUDY LEAVE.

Ref: your Endst.No. 145 dated 2/8/88.

This is to inform you that Training to be undergone by the applicant from the institution of Technology Peshawar is not Professional & therefore Mr. Mohammad Hassan WF of your School cannot be granted study leave. He should however apply for earned leave as due and admissible to him under the rules.

The Service Book of the above named teacher is returned herewith.

Encls.

Encl: S/Book.

H.
By: Director of Education,
FATA, N.W.F.P. Peshawar.

AD



**KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR**

No. 1135 /ST

Dated: 24/5 /2022

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281
Fax:- 091-9213262


To

The Director E&SE,
Government of Khyber Pakhtunkhwa,
Peshawar.

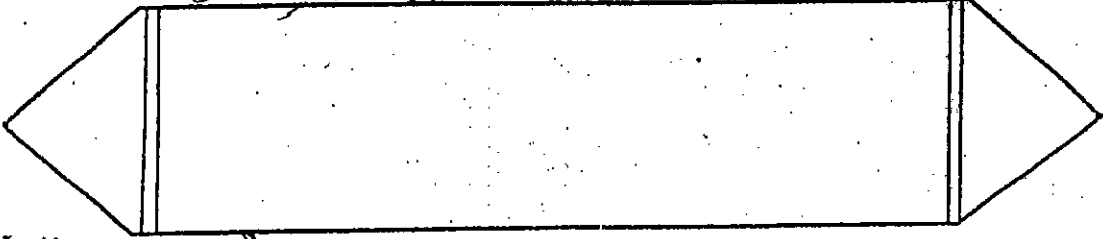
Subject: JUDGMENT IN APPEAL NO. 748/2018 MR. MUHAMMAD HASSAN.

I am directed to forward herewith a certified copy of Judgement dated 20.01.2022 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR

بعدالت سروس ٹریبونل کے لیے درخواست



2018ء پنجاب ریلائٹس

بنام حکومت

محمد حسن

موزخہ 2018 - 5 - 21

مقدمہ

دعویٰ سروس ایس

جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ
آن مقام کے لیے محمد اسد خان کدر ڈی ایئر سروس

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل 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 وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخ
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی 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 باختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ 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 ادکالت نامہ لکھ دیا کہ سند رہے۔

المرقوم 21 ماہ مئی 2018

بمقام

Accepted

محمد حسن

کے لئے منظور ہے۔

بمقام