

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

Khyber Pakhtunkhwa  
Service Tribunal

SERVICE APPEAL No. 624/2022

Diary No. 7264  
29/8/2023


Mr. Amir Hamza

VS

Government of KPK

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Respondent No. 04  
Excutive District Officer  
(Male) Dera Ismail Khan

**BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR**

**SERVICE APPEAL No. 624/2022**

**Mr. Amir Hamza**

**VS**

**Government of KPK**

**PARAWISE COMMENTS ON BEHALF OF RESPONDENTS 1 TO 4.**

**PRELIMINARY OBJECTIONS**

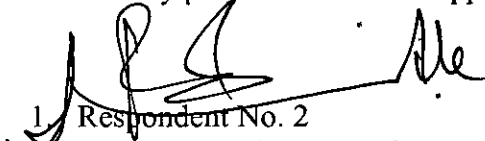
1. That the appellant has got no cause of action / locus standi. To file present appeal.
2. That the appellant has not come to the honorable tribunal with clean hands.
3. That the appellant has filed the service appeal on malafide objectives.
4. That the instant appeal is against the prevailing laws and rules.
5. That the appeal is barred by law and limitations.
6. That the instant appeal is illegal and against the facts.
7. That the appellant has concealed the material facts from the honorable tribunal.
8. That the appeal is badly time barred.
9. That the appeal is had for mis joinder and non joinder of necessary parties.

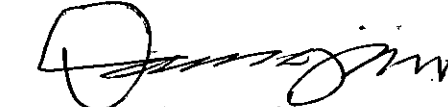
## Respectfully Sheweth, Reply on behalf of Respondents

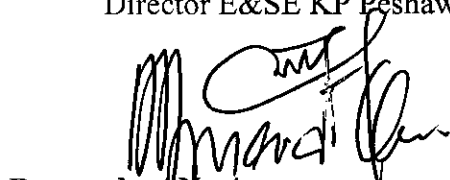
Respected Sir, The respondents No. 1 to 4 humbly submits as under

1. Para pertains to the appointment of appellant as a Qari Teacher BPS-12 on 20-01-2014.
2. Para pertains to the marks secured by appellant 134.16.
3. Para pertains to the appointment orders of appellant on 14-12-2015.
4. Para pertains to the seniority list prepared by respondent No. 4 D.E.O Male D.I.Khan in which appellant is placed at Serial No. 66 against his merit position No. 56. Rest of para pertains to the record.
5. The respondent No. 4 DEO M DIKhan as constituted a committee for correction of Seniority List in all CT Teachers and other teaching cadre post by the Endrst No. 2193-94 Dated 01-02-2023. All the necessary action should be taken to correct all mistakes in seniority list of CT Teachers. Findings and recommendation of committee is still pending.
6. Para pertains to the record of departmental appeal.
7. As replied above.
8. Incorrect / not admitted: All the teachers should be adjusted on their correct place after the recommendation of departmental promotion committee.
9. Para pertains to record.

So it is humbly prayed that service appeal of appellant may kindly be dismissed with cost.

  
1. Respondent No. 2  
Secretary E&SE KP Peshawar.

  
2. Respondent No. 3  
Director E&SE KP Peshawar.

  
Respondent No.4.  
District Education Officer  
(M) D. I. Khan



**OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) DERA ISMAIL KHAN**

Tell: 09669280131

Email: emisdikhan@gmail.com

**NOTIFICATION**

The undersigned is pleased to notify the below committees, comprising of the following officers, for the finalization/ updation of seniority lists of different district cadre posts appointed up to 18/11/2022. The committee members are directed to submit the said seniority lists to the office of the undersigned on or before 18/02/2022 and the seniority lists of PSTs/SPST/PSHT on or before 28/02/2022. The committees are further directed to prepare separate seniority lists for senior and junior cadres.

**CT-IT (at GHS DIMPUR DIKHAN)**

1. MUHAMMAD IQBAL, Head Master GHS Dimpur DIK (Chairman)
2. HASHMAT LOHANI, SST GHS Dimpur (Member)
3. MUHAMMAD FAIZAN, CT-IT GHS Dimpur (Member)

**AT, TT, QARI (at GHSS #4 DIKHAN)**

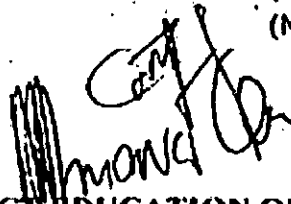
1. INAYAT ULLAH, Principal GHSS Kath Garh (Chairman)
2. UMER SULTAN, STT GHSS No. 4 DIKhan (Member)
3. MAJID QAYYUM, JC GHSS No. 4 DIKhan (Member)

**PET, DM (at GHS #5 DIKHAN)**

1. QAISAR ANWAR, Principal GHS No. 5 DIKhan (Chairman)
2. MUHAMMAD YOUSIF, Sr. PET GHS No. 5 DIKhan (Member)
3. ARSHAD JAVED, D/A LOCAL OFFICE (Member)

**Primary School Teachers (at GPS #10 DIKHAN)**

1. Dr. MUHAMMAD SHAKEEL, Principal GHSS MURIALI (Chairman)
2. Dr. ABDUL HAFEEZ, SDEO(M) DIKhan (Member)
3. NOOR SULTAN, SDEO(M) Paharpur (Member)
4. ASMAT ULLAH, ADEO(Estb) Local Office (Member)
5. ZAFFAR ABBAS, SST GHS No. 6 DIKhan (Member)

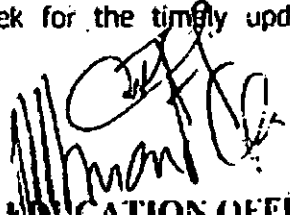
  
DISTRICT EDUCATION OFFICER  
(MALE) DIKHAN

Dated DIKhan the 01/02/2023

Endst No 2193-94

Copy for Information to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
2. All Principals/HMs of GHSS/GHS/GMS are directed to provide service books of the teaching staff to the committees within a week for the timely updation of seniority list.

  
DISTRICT EDUCATION OFFICER  
(MALE) DIKHAN

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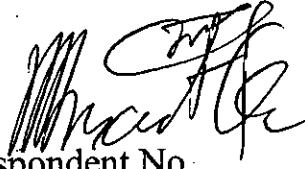
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### Authority

I District Education Officer (M) D.I.Khan do hereby authorized Mr: Muhammad Kamran Khan to attend the honorable Service Tribunal KPK Peshawar on behalf of respondent in connection with submission para wise comments till the decision of service appeal.

  
Respondent No.  
District Education Officer  
(M) D.I.Khan

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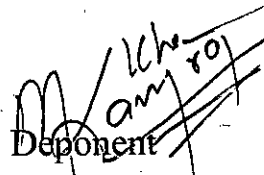
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### Affidavit

I Mr: Muhammad Kamran Khan Legal Representative of DEO (M) D.I.Khan do solemnly affirm and declare on oath that contents of written reply are correct to the best of my knowledge and nothing has been concealed from this honorable Court. It is further stated that on oath in this appeal the answering respondents have been neither placed ex-parte nor their defense has been struck off.

  
Deponent