

**Service Appeal No. 1311/2013**

Karim Khan S/o Muhammad Salim PST Teacher GPS Matta Khas, Mardan.

**VERSUS**

Director of Education Khyber Pakhtunkhwa Peshawar & another.

**Order**

22.11.2017

Learned counsel for the appellant present.


Learned Deputy District Attorney present.

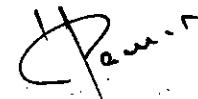
Arguments heard. File perused.

Learned counsel for the appellant argued that he would press the present appeal to the extent that the respondent department may be directed to prepare seniority list of PST Teachers District Mardan strictly in accordance with the provision of Section 8 of Khyber Pakhtunkhwa Civil Servant Acts 1973.

Admittedly the appellant is a PST Teacher and as such is a Civil Servant too. The respondent department so far failed to produce any seniority list which includes the name of the appellant. In the circumstances of the case and in view of the stance of learned counsel for the appellant the respondent department is directed to prepare seniority list of PST Teachers District Mardan strictly in accordance with the legal provisions/Section 8 of the Khyber Pakhtunkhwa Civil Servant Act 1973. Parties are left to bear their own costs. File be consigned to the record room.


Disposed off accordingly.

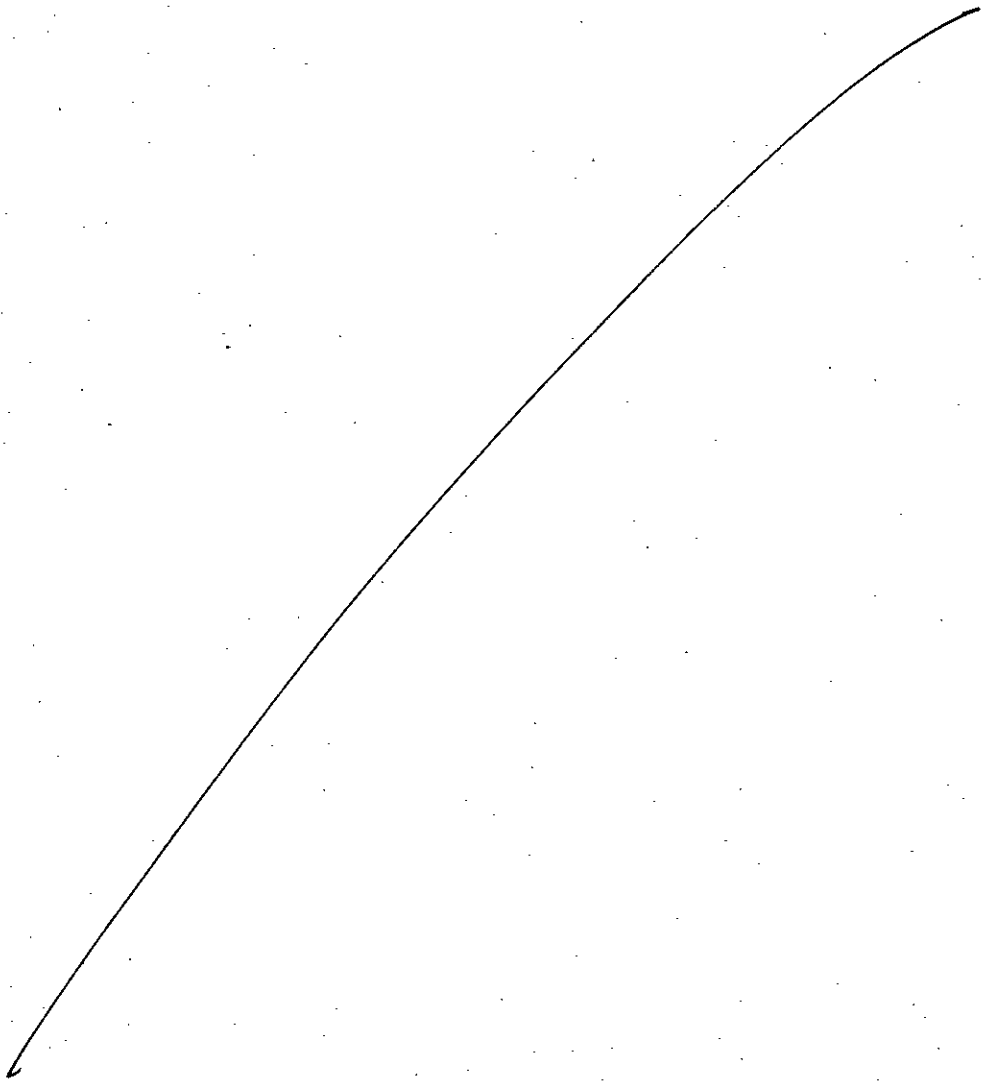
  
(Gul Zeb Khan)  
Member

  
(Muhammad Hamid Mughal)  
Member

23/8/2017

Counsel for the appellant and Mr. Adeel Butt, AAG the respondents present. Arguments could not be heard due to non availability of DB. To come up for arguments on 22/11/2017 before DB.

  
(GUL ZEB KHAN)  
MEMBER



17.08.2016

Appellant in person and Additional AG for the respondents present. Rejoinder not submitted and requested for further time to file rejoinder. Request accepted. To come up for rejoinder and arguments on 26-12-16 before D.B.

Member

Member

26.12.2016

Clerk to counsel for the appellant and Mr. Hameed ur Rehman, AD (Litigation) alongwith Mr. Ziaullah, GP for respondents present. Arguments could not be heard due to incomplete bench. Case adjourned to 02.05.2017 for rejoinder and arguments before D.B.

Chairman

02.05.2017

No one present on behalf of the appellant. Mr. Muhammad Jan, Government Pleader for respondent present. Notice be issued to the appellant and his counsel. To come up for final on 23.08.2017 before D.B.

Member

Chairman

26.11.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was initially appointed as Elementary Teacher (PST) in the year 1995. That according to section-8 of NWFP Civil Servants Act, 1973 appellant was entitled to be shown in the seniority list of the said cadre but despite repeated efforts of the appellant the respondents failed to adhere to his demand as such the appellant preferred departmental appeal on 5.4.2013 which was not responded and hence the instant service appeal on 2.8.2013.

That the appellant is entitled to have his name included in the seniority list of PST Cadre.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 23.2.2016 before S.B.

Appellant Deposited  
Security & Process Fee

  
Chairman

23.02.2016

None present for appellant. M/S Hameed-ur-Rehman, AD (lit.) and Javed Shah, legal Advisor alongwith Addl: A.G for respondents present. Requested for adjournment. To come up for written reply/comments on 26.4.2016 before S.B.

  
Chairman

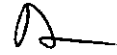
26.4.2016

Counsel for the appellant, M/S Hameed-ur-Rehman, AD (lit.), Khurshid Khan, SO and Javed Shah, litigation officer alongwith Addl: A.G for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 7.8.2016.

  
Chairman

02.03.2015

None present for appellant. Add: AG for the respondents present. Notice be issued to counsel for the appellant for preliminary hearing for 28.04.2015 before S.B.



Member

28.04.2015

Appellant in person and Mr. Ziaullah, GP for the respondents present. Appellant requested for adjournment. To come up for preliminary hearing on 15.06.2015 before S.B.



Member

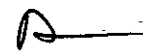
15.06.2015

Mr. Gul Hussain, Advocate on behalf of counsel for the appellant and Asstt: AG for the respondents present. Counsel for the appellant is not in attendance. Requested for adjournment. Adjourned to ~~17~~ 17.08.2015 for preliminary hearing before S.B.

Member

27.08.2015

None for the appellant present. Asstt: AG for respondents present. Notice be issued to appellant/counsel. To come up for preliminary hearing on 26.11.2015 before S.B.

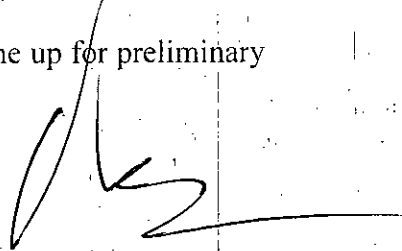


Member

130/13

15.08.2014

Appellant alongwith his counsel present. Preliminary arguments partly heard. The appellant through instant appeal prayed for his seniority as PST Teacher. In this respect the appellant filed departmental appeal which was not responded. However, post of the appellant has been upgraded from BPS 7 to BPS 12 and his case re-scrutinized, Hence pre-admission notice also be issued to the learned GP to assist the Tribunal in light of record available with the respondents. To come up for preliminary hearing on 30.09.2014.

  
Member

30.09.2014

Clerk of counsel for the appellant and Mr. Wisal Muhammad, ADO with Mr. Kabirullah Khattak, Asst: Advocate General for the respondents present. Preliminary arguments could not be heard due to General Strike of the Bar. To come up for preliminary hearing on 09.12.2014.

  
Member

Reader Note:

09.12.2014

Clerk of counsel for the appellant present. Since the Tribunal is incomplete, therefore, case is adjourned to 27.02.2015 for the same.

  
Reader


15.05.2014

Mr. Said Muhammd in the connected appeals present and filed an application for placing on file upgradation order of appellant from BPS-7 to BPS-12. He requested for adjournment. Request accepted. To come up for preliminary hearing on 30.06.2014.

  
Member


30.06.2014

Mr. Said Muhammad in the connected appeal present and requested for adjournment. Request accepted. To come up for preliminary hearing on 15.08.2014.

  
Member

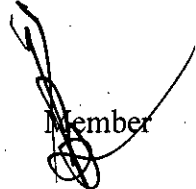
02.12.2013

Clerk of counsel for the appellant present and requested for adjournment. To come up for preliminary hearing on 20.01.2014.

Member 

20.01.2014

Mr. Said Muhammad in the connected appeals present and requested for adjournment as his counsel was busy in the High Court, Peshawar. To come up for preliminary hearing on 12.02.2014.

Member 

12.02.2014

Counsel for the appellant present and requested for adjournment. To come up for preliminary hearing on 26.03.2014.

Member 

26.03.2014

Mr. said Muhammad in the connected appeals present and requested for adjournment as his counsel was busy in the Peshawar High Court, Peshawar. Request accepted. To come up of preliminary hearing on 15.05.2014.



Member 



Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 1311 /2013


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	09/09/2013	<p>The appeal of Mr. Karim Khan resubmitted today by Mr. Yaqoob Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>2-12-2013</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2	11-9-2013	

The appeal of Mr. Karim Khan PST received today i.e. on 02/08/2013 is incomplete on the following scores which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 1- The law under which appeal is filed is not mentioned.
- 2- Copy of impugned seniority list is not attached with the appeal which may be placed on it.
- 3- Copies/of certificates mentioned I n para-2 of the memo of appeal (Annexure-A) is not attached with the appeal which may be placed on it.

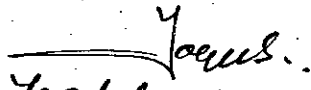
No. 1129 /S.T,

Dt. 5/8 /2013.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Yaqub Khan Adv. Mardan

Sir,  
objections removed, completed and re-submitted  
please. Moreover, the name of appellant is not placed in  
seniority list of pst in proper <sup>and not circulated to the appellant,</sup> hence not attached with  
memo of appeal.

  
Yaqub Khan Advocate.  
9/9/2013

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Appeal NO. 1311 /2013

Karim Khan s/o Muhammad Salim PST teacher GPS Matta Khas

Mardan r/o village Mata Katlang Tehsil and District, Mardan.

... Appellant.

VERSUS.

Director of Education Khyber Pakhtoonkhwa Peshawar.

and others.

.... Respondents.

I N D E X.

S.NO.	Description of documents.	Annexure.	Page.
1.	Memo of appeal w/Affidavit.		1-4
2.	Copy of Certificates of Petr:	A	5-6
3.	Copy of Service book of Ptr:	B.	7-18
4.	Copy of Order.	C.	19
5.	Copy of Affidavit.	D	20
6.	<del>of Appeal</del> Wakalat Name.	E	21-22 23

Appellant. Karim Khan

~~Said Muhammad Khan~~

Through Counsel:-

Karim Khan.

Dated: 07.2013.

Yaqub Khan  
(Yaqub Khan)  
Advocate Distt: Courts,  
Mardan.

Appeal NO. 1311 /2013

~~SECRET~~  
1994  
02-8-13

Karim Khan s/o Muhammad Salim PST teacher GPS Matta Khas  
Mardan r/o village Mata Katlang Tehsil and Distt: Mardan.  
.....Appellant.

VERSUS.

1. DIRECTOR OF EDUCATION KHYBER PAKHTOONKHWA PESHAWAR.
2. D.E.O (P) (M) MARDAN. ....RESPONDENTS.

*Under sec 4 of NWFP service Tribunal Act 1974,*  
APPEAL FOR INCLUDING THE NAME OF APPELLANT IN THE  
SENIORITY LIST OF PST TEACHER MARDAN ON THE BASIS  
OF HIS REGULAR APPOINTMENT OF APPELLANT AS A PST  
TEACHER VIDE ORDER DATED 29.8.1995 AS PER LAW  
AND RULE ACCORDINGLY.

R/Sir,

Appellant humbly submits as under:-

1. That appellant is posted as PST teacher with respondent department.
2. That appellant has equipped requisite qualification for the post of PST teacher.

(Copy of Certificates is attached as Annex:"A").

~~SECRET~~  
*Leahy*  
2/8/13  
Re-submitted to ~~copy~~  
and filed.

~~SECRET~~  
*Leahy*  
9/9/13

3. That appellant was appointed as E.T/ Primary teacher by respondent on 29/8/95 after completion of all codal formalities and took over charge and performed his duty with entire satisfaction of his superior and received his salary properly.

(Copy of service book is attached as Annex: "B").

4. That appellant has served with respondent's department from date of appointment till today and there is no any break in service of appellant.

5. That due to his best performance and well aware of his job, appellant was up-graded from EPS-5 to EPS-7 vide order dated 21.02.2011.

(Copy of order is attached as Annex: "C").

6. That appellant has got knowledge that respondent department has prepared seniority list, which is not circulated to the appellant but the name of appellant is not included in the seniority list of PST at his proper place on the basis of his regular appointment i.e. Ist: appointment of appellant.

(Copy of affidavit to the same effect is attached as Annex: "D").

7. That appellant preferred an appeal before the respondent NO.1 but in vain.

(Copy of departmental appeal is attached as annex: "E").

8. That appellant is entitled for placing in the seniority list of PST teachers, Mardan on the following grounds.

G R O U N D S:-

A. That when appellant was appointed as a Primary teacher against regular Post on regular basis, then as per Sec: 8 (4) of Civil Service Act 1973, he is entitled for seniority from the date when he was appointed i.e. 29/8/95.

B. That similarly placed all primary teachers have been included in the seniority list from the date of Ist: appointment, while appellant is ignored, which is clear and crystal discrimination.

C. That when appellant was appointed as Primary teacher on regular basis then he is entitled for his seniority from the date of his Ist: appointment at his proper place in the seniority list of PST teachers, Mardan.

It is therefore, humbly prayed that on acceptance of this appeal, respondents may please be directed to include the name of appellant in the seniority list of PST teachers, Mardan from the date of 1st: regular appointment at his proper place of seniority. Any other relief deemed fit may also be graciously awarded.

APPELLANT. Karim Khan  
~~\_\_\_\_\_~~  
 Karim Khan

Through Counsel:-

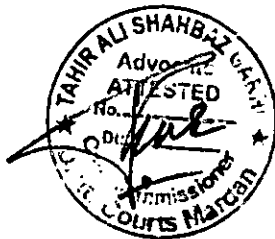
Yaqub  
 ( YACCOB KHAN )  
 Advocate Distt: Courts,  
 Mardan.

Dated: 01.08.2013.

A F F I D A V I T.

I, undersigned declare on Cath that contents of appeal are true and correct to the best of my knowledge and belief.

Deponent. Karim Khan  
~~\_\_\_\_\_~~  
 Karim Khan





University of Peshawar Aux A  
 Pakistan (5)  
 Detailed Marks Certificate

Master of Arts in Pashto  
 Final  
 Annual Examination 2012  
 District Mardan



Private

Name: KARIM KHAN

Gender: Male

Roll No: 35405

Father's Name: MOHAMMAD SALEEM

Registration No: 97-PS-14501

Division: 2nd

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
Modern Poetry-VI	100	43	Forty Three
Modern Prose-VII	100	61	Sixty One
Detail Study of Khushal-VIII	100	40	Forty Only
Critical Literature Rhetoric-IX	100	40	Forty Only
Essay-X	100	47	Forty Seven
Viva Voce	100	65	Sixty Five
Previous 19039: Annual-2009	500	277	Two Hundred and Seventy Seven
Final	1100	573	Five Hundred and Seventy Three

Errors & omissions are subject to subsequent rectification

Chances Availed: 3

The Examination was taken in Parts

Examination held From: 29-Aug-2012 to 05-Oct-2012

Result Declared on Wednesday, February 20, 2013

Issue Date: 22-Feb-2013

10:23 am

*Attested to be true copy:- Yours*

(Prof. Dr. Rashid Khan)  
 CONTROLLER OF EXAMINATIONS  
 UNIVERSITY OF PESHAWAR





# ABDUL WALI KHAN UNIVERSITY

MARDAN, PAKISTAN

## TRANSCRIPT

6

### SIR SYED COLLEGE OF EDUCATION B.Ed

Name: KARIM KHAN

Father's Name: MUHAMMAD SALIEM

Roll No: 6026

Registration No: 11-AU-SSEM-M-26

1st Semester (Spring, 2011)							
Title of Course	Total Marks	Marks Obtaine	CR Hrs	NG	GP	GPA	Remarks
Perspective of Education	100	56	3	1.6	4.8		
Curriculum & Instruction	100	53	3	1.3	3.9		
School Organization & Management	100	54	3	1.4	4.2		
Computer Literacy	100	70	3	3	9		
Islamic Education	50	39	2	3.8	7.6		
Functional English	50	43	2	4	8		
TOTAL	500	315	16		37.5	2.34	Promoted
2nd Semester (Fall, 2011)							
Title of Course	Total Marks	Marks Obtaine	CR Hrs	NG	GP	GPA	Remarks
Educational Psychology	100	77	3	3.7	11.1		
Classroom Assesment	100	74	3	3.4	10.2		
Teaching of English	100	63	3	2.3	6.9		
Teaching of Urdu	100	79	3	3.9	11.7		
Project	100	50	3	1	3		
Teaching Practice	200	156	6	3.8	22.8		
TOTAL	700	499	21		65.7	3.13	Passed

37

103.2

CGPA 2.79

Errors & Omissions are subject to subsequent rectification

Result Declaration Date: - May 04, 2012

Prepared by: Ijaz Ahmad

Checked by: Shahzad Khan

Controller of Examinations

*Attested to be*

*true copy: -*

*Ans.*

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PRY: MARDAN.

Aux B  
①

APPOINTMENT.

Mr. Karim Khan S/O Mohammad Salim Khan Village Matha Katlang Tehsil & District Mardan is hereby appointed as Elementary Teacher at Govt: Elementary School Matha Katlang (Mardan) in EPS-05 (Reg. 1400-66-2390) P.M Plus usual allowance as admissible to him under the rules with immediate effect in the interest of public service with the following terms and condition.

TERMS AND CONDITION.

1. His appointment is made purely on Temp: basis and liable to termination at any time with out assigning any reason or notice.
2. In case of resibnation he will have to submit one months pay in leiutherefoe to the Govt:
3. He is required to produce Health and age Certificate from the M/S DHQ Haspital Mardan before taking over charge.
4. His original certificate should be checked before handing over charge.
5. He should not be allowed to take over charge if his age is less than 18 year and above 3 years.
6. If he fail to take ever charge of the post within 15 days on the issue of this order his appointment order will be cancelled.
7. NO.TA/RA etc is allowed.
8. Charge report should be submitted to all cocerned.

(MR. FAZLI RABBI KHAN)  
~~XXXXXXXXXXXXXXXXXXXX~~  
DISTRICT EDUCATION OFFICER,  
(MALE) PRIMARY M A R D A N.

Endst: No. 2952-53 / F.No. 25 / Apptt: PTC / I-AE, dated. 29/8/1995.

Copy to the:-

1. Sub-Divisional Edu: Officer (Male) Mardaa.
2. Candidate concerned.

DISTRICT EDUCATION OFFICER,  
(MALE) PRIMARY M A R D A N.

*Attested*

*ICB*  
*20/4/2010*  
Asstt: Distt: Officer  
Eic: Edu: (M) Madan

*Spontaneous transfer*  
*[Signature]*  
Asstt: Distt: Officer  
(Male) P. Primary Mardaa.

(For use in Police Department only)

Heirs: ① Passed SSC Exam, 1993(A) from The BISE Peshawar under R. No 23570 securing 446. Grade 'C'. Entry made on the basis of 850 provisional certificate dated 11.8.93.

*[Signature]*  
Sub Div. Edu. Officer,  
(M) Mardan.

3. 2) Passed Intermediate Examination 1995 (Supply) from the BISE Peshawar under Roll No 11665 Verification Roll No. dated received back. Securing 524/1100 Grade "D". Entry made in the basis of provisional Certificate Result declared on 16th March, 1996.

Left Thumb-Impression

*[Signature]*  
Sub Div. Edu. Officer (M) Mardan.

③ Passed P.T.C. Exam: from Allama Iqbal Open University Islam Abad in Autumn 1998 under Roll No. H6501577, obtaining 53% marks & has been placed in Grade "C". Result declared on 28-04-2000.

Qualifications	Date	S. D. B. O. (M) Qualifications	Date
④ English Pushto	BA Bzeams. From University of Peshawar Under Roll No. 83917 securing 297 marks out of 550 and has been placed in 2nd division. Result declared on B.I. (or B.No) - 2008.	<i>[Signature]</i> S. D. B. O. (M) Mardan.	
Urdu		Pleadership Examination	
Plan-Drawing		Training School Final Examination	53/100 AMIE District (Male) Peshawar
Finger Print		Other Qualifications:—	
Drill Instructing			
Court Duties			
Reserve Duties			

N.B.— Line to be drawn under the qualification possessed.

Note:— The entries in this page should be renewed or re-attested at least every five years and the Signature to lines 9 and 10 should be dated.

1. Name: KARIM KHAN

2. Race: Afghan

3. Residence: Matha (Katlauq) Teh; Distt. Mandan.

4. Father's name and residence: Muhammad Saleem  
vill: Matha (Katlauq) Teh; Distt. Mandan.

5. Date of birth by Christian era as nearly as can be ascertained: 31-05-1977  
Thirty, ist May, H. H. seventy seven.

6. Exact height by measurement: 5-6

7. Personal marks for Identification: Black mole on the left side chin.

8. Left hand thumb and Finger Impression of (Non-Gazetted) Officer.

Little Finger

Ring Finger

Middle Finger

Fore Finger

Thumb

9. Signature of Government Servant

Karim Khan

10. Signature and Designation of the Head of the Office, or other Attesting Officer.

[Signature]

Attested to be true  
copy - yours



(11)

9 Signature and position of the head of office or other attesting officer in columns 1 to 8	10 Date of termination of appoint- ment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting Officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant	
				Nature and dura- tion of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debtible to another Government			
					Period			Government to which debtible
S.D.E.O. (M) Mardan	30/11/96	Final	S.D.E.O. (M) Mardan		Appointed against as elementary teacher at Govt. Elementary school Matlika (Matlang) in PPS No 05 (Rs. 1400 - 66-2390) P.H. vide D.E.O. (M) pry Mardan. Encl No- 2952-53 F. No 25 HPTL. PTC/ 1-AE dated 29.8.1995			
S.D.E.O. (M) Mardan	30/11/97	Final	S.D.E.O. (M) Mardan					
S.D.E.O. (M) Mardan	30/11/99	A/G	S.D.E.O. (M) Mardan					
S.D.E.O. (M) Mardan	30/11/99	A/G	S.D.E.O. (M) Mardan					
S.D.E.O. (M) Mardan	30/11/98	A/G	S.D.E.O. (M) Mardan		Service Verified w.e.f. 4.9.95 to 27.12.96 from the Acq Roll & other record of this office.			
S.D.E.O. (M) Mardan	30/11/2000	A/G	S.D.E.O. (M) Mardan					
S.D.E.O. (M) Mardan	30/11/2001	A/G	S.D.E.O. (M) Mardan					
S.D.E.O. (M) Mardan	30/11/2002	A/G	S.D.E.O. (M) Mardan					
S.D.E.O. (M) Mardan	30/11/2003	A/G	S.D.E.O. (M) Mardan					
S.D.E.O. (M) Mardan	30/11/04	A/G	S.D.E.O. (M) Mardan					
S.D.E.O. (M) Mardan	7/1/2005	Revision of pay Scale	S.D.E.O. (M) Mardan		MF No 396 11/3 Drawn out of pay of 2003 in the of less than 19mc of 11/95 to 10/99. (1466-1400)(1552-1400)(1598-1400) (1598-1572) = 64422/ 2m(107-98)(107-98)(112-98)(112-107) = 3135 Total 64735			

Change grant = 3/2000.

M. Aslam







14

1	2	3	4	5	6	7	8
Name of Post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
		Revised pay scales 2007 BPS NO 5 (2780-135-6830)					
GEPS Mata Khas	sub, off		RS 4265/- P.M.			1/7/07	<i>[Signature]</i>
-do-	sub, off		RS 4400/- P.M.			1/12/07	<i>[Signature]</i>
		Revised Basic Pay Scale 2008 BPS NO 5 @ Rs (3340-160-8140)					
DO	sub, off		Rs 5260/- P.M.			01/7/2008	<i>[Signature]</i>
-do-	-do-		RS 5420/- P.M.			1/12/2008	<i>[Signature]</i>
-do-	-do-	<del>BPS NO 7 (3530-170-7230)</del>					
-do-	-do-		RS 5580/- P.M.			01/12/2008	<i>[Signature]</i>
-do-	-do-		RS 5740/- P.M.			1/12/10	<i>[Signature]</i>
	B-5	OFFICE OF THE ACCOUNTANT GENERAL N.W.F.P PESHAWAR. BY FIXED IN THE REVISED BASIC PAY SCALES					
	4265/07	OF RS. 2780-135-6830 (5) AT RS. 4265/- P.M.W.E.F. 07-2007 With Next increment on 1-12-2007					
	5260/08	<i>[Signature]</i> Accounts Officer Pay Fixation Party N.W.F.P. Peshawar					
		OFFICE ORDER					
		All kind of recruitment orders against The Post of Elementary Teacher in various Govt. Elementary Primary schools in Distt. Mardan made during The year 2008 may be treated as cancelled from The date of its issue vide BDO (BPS) Mardan Inst. No: 202-5 dt: 31/12/08					

*[Signature]*  
BY: DISTT. OFFICER  
(M) PRIMARY MARDAN

9	10	11	12	13 Leave		14	15
Signature and Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Period	Government to which debitale		
<p><i>M. Z.</i> D.D.O (S &amp; L) Male Mardan</p>	<p>30-11-07 A/Inc</p>	<p><i>M. Z.</i> D.D.O (S &amp; L) Male Mardan</p>				<p><i>M. Z.</i></p>	<p>01-12-06</p>
<p><i>M. Z.</i></p>	<p>30-6-2008 Pay Revision</p>	<p><i>M. Z.</i> D.D.O (S &amp; L) Male Mardan</p>			<p>Promoted to BPS No 7 @ Rs (3530-190-9230) + usual allowances vide E.D.O (S &amp; E) Mardan enclst No 15473/G dated 17-12-2008.</p>		
<p><i>M. Z.</i> D.D.O (S &amp; L) Male Mardan</p>	<p>30-11-08 A/Inc</p>	<p><i>M. Z.</i> D.D.O (S &amp; L) Male Mardan</p>					
<p><i>M. Z.</i> D.D.O (S &amp; L) Male Mardan</p>	<p>30-11-2009 Promoted to BPS 7 Aligne</p>	<p><i>M. Z.</i> D.D.O (S &amp; L) Male Mardan</p>				<p><i>M. Z.</i> D.D.O (S &amp; L) Male Mardan</p>	
<p><i>M. Z.</i> D.D.O (S &amp; L) Male Mardan</p>	<p>30-11-2010 A/Inc</p>	<p><i>M. Z.</i> D.D.O (S &amp; L) Male Mardan</p>					
<p><i>M. Z.</i> D.D.O (S &amp; L) Male Mardan</p>	<p>30-2-2011 Promoted to BPS 7</p>	<p><i>M. Z.</i> D.D.O (S &amp; L) Male Mardan</p>	<p>Upgraded</p>			<p>Service Verified w.e.f. 1-12-07 to 30-11-08 from the Acc: Roll &amp; other record of this office</p>	
	<p>9</p>		<p>9</p>			<p><i>M. Z.</i> D.D.O (M) Mardan</p>	
<p>OFFICE OF THE ACCOUNTS OFFICER NW F. P. S. MARDAN PAY FIXED IN THE REVISED BASIS PAY SCALES 1</p>						<p>Deputy District Officer Els; Etd; (M) Mardan</p>	
<p>C 13 3340-160-8160 A 5 5269 PM.W.E.F</p>		<p>1-07-2009 1-12-2008</p>					
<p>Accounts Officer</p>						<p>Service Verified w.e.f. 10/12/09 to 30-11-2010 from acquittance Roll and other office record</p>	
						<p>Deputy District Officer Els; Etd; (M) Mardan</p>	

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31/12

16

1	2	3	4	5	6	7	8
Name of Post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
P.S.I		C.S. (BPS. 7 @ Rs 3530-190-9230)					
EPS Main Khas	sub/off		Rs 5810/- PM ✓			21/2/2011	K
		Revised Pay Scales, 2011					UP Pay @ 5810/- PM 5/11
		BPS No. 7, @ Rs. 5840-320-					A
do	do		Rs 9640/- PM ✓			01/7/2011	
do	do		Rs 9830/- PM			1/12/11	

17

9	10	11	12	13		14	15
				Leave			
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitabale to another Government		
Signature and name of the head of the office or other attesting officer in columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Period	Government to which debitabale	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				<p>Dy: Distt Officer (Male) Pry: Mardan</p>	<p>30<sup>6</sup>/<sub>2011</sub></p>		
<p>Dy: Distt Officer (Male) Pry: Mardan</p>	<p>30<sup>11</sup>/<sub>11</sub></p>	<p>A/Duc</p>	<p>Dy: Distt Officer (Male) Pry: Mardan</p>	<p>MF-83 15/11/11 Drawn Rs: 2874/- on acct of AA-55/ for the month of 7/11.</p>	<p>Dy: Distt Officer (Male) Pry: Mardan</p>	<p>Service Verified w.e.f. 10.10.2011 to 31.10.11 from acquittance Roll and other office Record</p>	
<p>Dy: Distt Officer (Male) Pry: Mardan</p>						<p>ASAO Addl: Distt. Secy Officer Mardan</p>	<p>Deputy Distt. Officer (Male) Pry: Mardan</p>

8 Signature of Government Servant	9 Signature and name of the head of office or other attesting officer in sections 1 to 8	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting Officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
						Period		
						In light of Finance Deptt. Order No 50 (F.R) FD/10 Dated 16-07-2012 Sanctioned		Govt of P.S. 22 (E) 2010 is hereby
						accorded to the the upgradation of P.S. Post to BPS 12 w.e.f 01-07-12 with EDO (E & SE) Edu, Govt No 1443-20 Dated: 16/07/12		
						S.No. 217		
								By: Distt. Officer (Male) P.S. Mardan
						<b>UNDERTAKING</b>		
						Mr. Karim Khan		
						is hereby given an undertaking to the effect that if any discrepancy has made to me as incorrect award of Rs. 12 With effect from 01-07-12 to be recovered from my pay, pension and gratuity		
						Signature: [Handwritten]		
								By: Distt. Officer (Male) P.S. Mardan
						<b>OPTION</b>		
						Mr. Karim Khan		
						is hereby given an undertaking to the effect that if any discrepancy has made to me as incorrect award of Rs. 12 With effect from 01-07-12 to be recovered from my pay, pension and gratuity		
						Signature: [Handwritten]		
								By: Distt. Officer (Male) P.S. Mardan
						Attested to be true copy: [Handwritten]		

Annex C

19

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E & S) EDUCATION MARDAN.  
ADJUSTMENT.

Consequent upon the competent authority is pleased to allow Up-gradation of Mr. Karim Khan E.T and Liaqat Ali E.T from BPS 05 to BPS-07, and merged him in the cadre of P.S.T vide Govt. Khyber Pakhtunkhwa E & SE Deptt. No. So (PE) 4-3/ Apptt./P.T.C/E.T/Rules/Policy/Vol: III Dated 21.02.2011.

More over they are adjusted as under:-

S.No.	Name of Teacher/ School	To	Remarks
1.	Mr, Karim Khan PST GEPS, Matta Khas	GPS, No.2 Shamoza	N.C.P
2.	Mr, Liaqat Ali PST GEPS, Khani Koti	GPS, Par Hoti Mardan.	

Necessary entry to this effect should be made in his Service Book.

(BAHADAR KHAN MARWAT)  
EXECUTIVE DISTRICT OFFICER  
(E & S) EDUCATION MARDAN.  
Dated 25/4/2012.

Endst: No 5566-65 /Adjustment

Copy forwarded to the:-

1. Dy: District Officer (M) P/ry: Mardan.
2. District Accounts Office Mardan.
3. Official Concerned.

EXECUTIVE DISTRICT OFFICER  
(E & S) EDUCATION MARDAN.

25/4/12

office of the deputy district officer P/ry: Mardan

Endst No. 1216-9 / Adj. File dated 16/5/2012  
copy to the:-

1-2 ADO (allow) and PDCs Shami Hat Mardan

3-4 Head Teacher GPS no. 2 Shamoza & GPS Par Hoti Mardan

Attested to be  
true copy:-  
Yours.

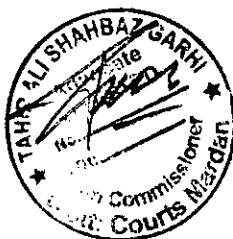
*[Signature]*

Aux D  
20

A F F I D A V I T.

I, under-signed solemnly affirm and do  
verify that Respondents department has prepared  
the seniority list of PST teachers , Mardan but  
my name is not included in the said seniority at  
my proper place of seniority on the basis of my  
regular appointment of Primary teacher.

Deponent/Appellant. Kasim Khan



~~\_\_\_\_\_~~  
Kasim Khan.

Karim Khan PST teacher GPs Matta khas  
Mardan. . . . . Appellant.

Versus

D.E.O (M), Mardan. . . . . Respondent.

Appeal against seniority list of  
PST Teacher circulated by Respondent,  
whereby, the name of appellant stood at  
Serial No. . . . . instead of S.No.  
while appellant was appointed on  
which is illegal, against law & facts.

RESPECTFULLY SHEWETH:

1. That appellant is posted as a PST Teacher with Respondent Department.
2. That the appellant has passed PTC Examination in the year . . . . . and issued PTC Certificate on . . . . . (Copy attached).
3. That appellant was appointed as E.T. Teacher by Respondent On . . . . . after completion his all Codal formalities and appellant has taken over charge and served with respondent to the satisfaction of his superior. (Copy of appointment order is attached as Annexure-'B').
4. That appellant has served till today without any break in service of appellant and received his salary till today.



5. That appellant has placed in the seniority list of PST already prepared by respondent at serial No. \_\_\_\_\_ in the year of \_\_\_\_\_ (Copy of previous seniority list is attached as Annexure-'C').
  
6. That presently appellant received his seniority list of PST Teacher on 27.3.2013 wherein, appellant stood at serial No. \_\_\_\_\_ instead of \_\_\_\_\_ while appellant was appointed on \_\_\_\_\_ as per service book of appellant. (Copy of Service Book of appellant and affidavit to the same effect is attached as Annexure-'D').
  
7. That appellant was upgraded from BPS-5 to BPS-7 being senior most and qualifide vide order dated 21.2.2011. (Copy of order is attached as Annexure-"E").
  
8. That after similarly placed teacher were granted seniority from the date of first appointment, while appellant is ignored, which is clear and crystal discrimination.

It is, therefore, humbly prayed that on acceptance of this Appeal, service of appellant may please be counted from first appointment i.e. \_\_\_\_\_ and name of appellant may please be placed at S.No. \_\_\_\_\_ instead of \_\_\_\_\_ will all back benefit. Any other relief deemed fit may also be graciously awarded.

*Jasimul*  
Appellant

through:

*Yaqoob Khan*  
(YAQOOB KHAN)  
Advocate Distt: Courts, Mdn.

Dated: 5.4.2013.

*Attested to be  
true copy:-  
Yaqoob Khan*

# بعدالت سردسز کمپنل (پ) در

کورٹ فیس

انٹرنٹ

2013ء منجانب

مورخہ: 1 اگست

بنام: راجو کیشن

کریم خان

مقدمہ:

ریسل

دعویٰ:

جرم:

## باعث تحریر آنکہ

Kalimullah  
مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی اور متعلقہ آن مقام (پ) کے لئے لیسوئے خان (پ) کے مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جو اب دہی اور اقبال دعویٰ اور بصورت ڈگری کرانے اجراء اور وصولی چیک روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زراس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمد ہوگی اور منسوخی دائر کرنے کی اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مذکور کے عمل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اس کا ساختہ برواختہ منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا تاکہ سند رہے۔

المرقوم / ماہ اگست 2013ء

بد گواہ شاہد العبد

کے لئے منظور ہے۔

بمقام:

Attested & Accepted  
Yours:

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR .

---

Appeal No. \_\_\_\_\_/2013.

Karim Khan vs Director of Education  
of KPK, Peshawar.

Subject :- Application for Placing on file  
upgradation order of appellant from  
BPS- 7 to BPS -12.

R/Sheweth :-

1. That above captioned case is fixed for today.
2. That appellant is upgraded/promoted from  
BPS- 7 to B PS-12 on the basis of finance  
letter dated: 16-07-2012.  
( Copy of order is attached )
3. That instant document is necessary document  
for instant case, which may please be placed  
on file <sup>for</sup> further proceeding of the case.

It is therefore, humbly requested, that  
upgradation order of appellant may please be  
placed on file.

Dated : 15-05-2014

*Karim Khan*  
Appellant

Through Counsel  
Yaqub Khan Advocate *Yaqub*  
High Court At Distt :  
Courts Mardan.

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN.

NOTIFICATION.

Consequent upon the approval given Pursuance of Finance Department of Govt: of Khyber Pukhtoon Khawa Peshawar No.SO(FR) FD/10-22(E)2010 dated, 16.7.2012, Sanction is hereby accorded to the grant of EPS-12 w.e.f. 1.7.2012 ~~to~~ in respect of Mr,Said Muhammad,PST, GPS, Raza Khan Kotey Takh Bhai on the basis of Up-Gradation of the post.

NOTE:- Necessary entry to this effect should be made in their Service book.

(BAHADAR KHAN MARWAT)  
DISTRICT EDUCATION OFFICER  
(MALE) MARDAN.

1138-40  
Endst:No. \_\_\_\_\_/EPD-12 File, Dated Mardan the, 6/21/2013.

Copy to the :-

1. Sub-Divisional Education Officer (Male) Prry: Takht Bhai.
2. District Comptroller of Accounts Mardan.
3. Teacher concerned.

*Handwritten Signature*  
DISTRICT EDUCATION OFFICER  
(MALE) MARDAN.

4/2/2013

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR .

---

Appeal No. \_\_\_\_\_/2013.

Said Mohammad vs Director of Education  
of KPK, Peshawar.

Subject :- Application for Placing on file  
upgradation order of appellant from  
BPS- 7 to BPS -12.

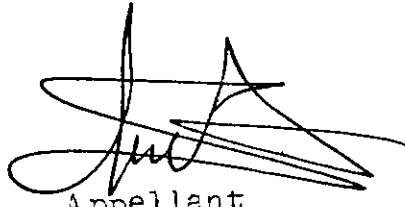
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letter dated: 16-07-2012.  
( Copy of order is attached )
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It is therefore, humbly requested, that  
upgradation order of appellant may please be  
placed on file.

Dated : 15-05-2014

  
Appellant

Through Counsel  
Yaqub Khan Advocate.  
High Court At Distt :  
Courts Mardan.

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR .

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Appeal No. \_\_\_\_\_/2013.

Karim Khan vs Director of Education  
of KPK, Peshawar.

Subject :- Application for Placing on file  
upgradation order of appellant from  
BPS- 7 to BPS -12.

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( Copy of order is attached )
3. That instant document is necessary document  
for instant case, which may please be placed  
on file <sup>for</sup> further proceeding of the case.

It is therefore, humbly requested, that  
upgradation order of appellant may please be  
placed on file.

Dated : 15-05-2014

*Karim Khan*  
Appellant

Through Counsel  
Yaquub Khan Advocate  
High Court At Distt :  
~~Courts Mardan.~~

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR .

---

Appeal No. \_\_\_\_\_/2013.

Karim Khan vs Director of Education  
of KPK, Peshawar.

Subject :- Application for Placing on file  
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( Copy of order is attached )
3. That instant document is necessary document  
for instant case, which may please be placed  
on file <sup>for</sup> further proceeding of the case.

It is therefore, humbly requested, that  
upgradation order of appellant may please be  
placed on file.

Dated : 15-05-2014

*Karim Khan*  
Appellant.

Through Counsel  
*Yaqub Khan*  
Yaqub Khan Advocate  
High Court At Distt :  
~~Courts Mardan.~~

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR.

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Appeal No. \_\_\_\_\_/2013.

Karim Khan vs Director of Education  
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letter dated: 16-07-2012.  
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It is therefore, humbly requested, that  
upgradation order of appellant may please be  
placed on file.

Dated : 15-05-2014

*Karim Khan*  
Appellant

Through Counsel  
Yaquub Khan Advocate  
High Court At Distt :  
~~Courts Mardan.~~



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

Service Appeal No. 1311 / 2013

Karim Khan S/O Muhammad Salim PST GPS Matta Khas Mardan R/O Vill; Mata Tehsil  
Katlang District Mardan.....Appellant

**Versus**

Director Education K.P.K. Peshawar & Other.....Respondents

**INDEX**

S.NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGES	
1.	Para wise comments along with affidavit		01	03
2.	Copy of order dated 21-02-2011	"A"	04	05

Respondents

Through



District Education Officer  
(Male) Mardan

Dated: \_\_\_\_\_

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

Service Appeal No. 1311 / 2013

Karim Khan S/O Muhammad Salim PST GPS Matta Khas Mardan R/O Vill; Mata Tehsil  
Katlang District Mardan.....Appellant

**Versus**

Director Education K.P.K. Peshawar & Other.....Respondents

Para wise comments on behalf of Respondents.

Respectfully Sheweth,

PRELIMINARY OBJECTION:

1. That the appellant has got no cause of action and locus standi to file the instant appeal.
2. That the instant appeal is incompetent in its present form, hence liable to be dismissed.
3. That the instant appeal is badly time barred.
4. That the appellant has not come to this Honourable Tribunal with clean hands.
5. That the appeal is not maintainable in its present form.
6. That the appellant is estopped by his own conduct.
7. That the appellant has concealed the material facts from this Honourable tribunal hence liable to be dismissed.
8. That the instant appeal is based on malafide intention, hence liable to be dismissed.
9. That the instant appeal is against the prevailing law and rules.
10. That the appellant has been treated as per law & rules.
11. That the appellant was upgraded from BPS-05 to BPS-07 and merged in PST Cadre on 21-02-2011 as per the rules. (Copy of order is attached as **Annex-"A"**)
12. That the seniority list of the different cadres prepared according to the rules and seniority cum fitness as having prescribed service duration and requisite professional qualification of the post in hand.
13. That the seniority of the Primary School Teacher were considered from having requisite professional qualification prescribed for initial recruitment of PST from taking over of the charge against the said post.

FACTUAL OBJECTIONS:


1. Para No 1 is incorrect baseless against fact and law, as the appellant was initially appointed as Elementary Teacher in the Education Department, hence denied.
2. Para No 2 pertains to record, hence no comments.
3. Para No 3 is correct to the extent that the appellant was appointed as elementary teacher being untrained at that time, hence no comments.


- 4. Para No 4 pertains to record, as thoroughly explained supra in the preliminary objections, hence need no comments.
- 5. Para no 5 is incorrect, the Elementary Teacher Cadre being "Dying Cadre" was then merged in to the PST Cadre on 21-02-2011, hence denied.
- 6. Para No 6 is incorrect, as thoroughly explained supra in preliminary objection the criteria for seniority is to be considered from the date of appointment on a requisite post accordingly, while the appellant was appointed as Elementary Teacher initially being untrained which was then declared as "Dying Cadre" and Re-Designated / Merged to the PST Cadre on 21-02-2011. So, the seniority would be maintained from 21-02-2011 being appointment date of the appellant as PST, hence denied.
- 7. Para No 7 pertains to record, hence need no comments.
- 8. That the detailed reply of the ground has been given below.

GROUNDS:

- A. Para A is incorrect baseless against fact, the appellant was appointed as Elementary Teacher on 12-03-1995 being untrained it is important to mention that upon declaration of Elementary Cadre was Re-Designated - Merged as PST Teacher on 21-02-2011. So, the seniority would be maintained from 21-02-2011 being appointment date of the appellant as PST, hence no comments.
- B. Para B is incorrect, baseless and the respondents by following the seniority rules, prepared the seniority list, hence denied.
- C. Para C is incorrect, as thoroughly explained supra, hence need no comments.

Therefore it is humbly prayed that keeping in view the above mentioned facts the instant appeal may kindly be dismissed with cost.

  
 Director E & SE  
 Peshawar

Respondents  
  
 District Education Officer  
 (Male) Mardan

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

Service Appeal No. 1311 / 2013

Karim Khan S/O Muhammad Salim PST GPS Matta Khas Mardan R/O Vill; Mata Tehsil  
Katlang District Mardan.....Appellant

**Versus**

Director Education K.P.K. Peshawar & Other.....Respondents

AFFIDAVIT

I, Mr Javed Shah Legal Advisor Education Department Mardan do hereby solemnly affirm and  
declare that the contents of Para Wise Comments submitted by Respondents are true to the best  
of my knowledge and belief and nothing has been concealed from this Honourable Court.

Deponent



Javed Shah

16101-8562610-3



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
Dated Peshawar the 21-02-2011.

Ammer - A

NOTIFICATION.

NO.SO(PE)4-3/Apptt/PTC/ET/Rules/Policy/Vol.III. The competent authority on recommendation/approval of the up-gradation committee has been pleased to allow up-gradation of the following eighteen (18) Elementary Teachers from BS-05 to BS-07, merge them in the cadre of PST in Elementary & Secondary Education Department and re-designate their posts from Elementary Teachers to PST with immediate effect:-

S.No.	District	Name of Elementary teacher/Father's Name	School Name	Date of 1st Appointment on ET Post	BPS	Academic Qualification	Professional qualification	Present PM	Remarks
1	Peshawar	Mushtaq Ahmad s/o Aurangzeb Khan	GEPS Danish Abad	28.5.1988	5	MA	PTC	9084	Re-designated as PST
2	-do-	Mohammad Yousaf Khan s/o Haji Saiful Malook	GPS Gul Bela	27.6.1988	5	MA	PTC	10780	-do-
3	-do-	Muradullah s/o Habibur Rehman	GPS Lohori Gate Peshawar	8-7-1992	5	FA	PST	10034	-do-
4	-do-	Zardad Khan s/o Sher Muhammad Khan	GMKS Gul Bahar No.2 Peshawar	15-4-1996	5	FA	PTC	9582	-do-
5	Swabi	Farman Ali s/o Baghi Jn	GEPS Faqir Abad (Dagai)	31-8-1991	5	BA	PTC	6060	-do-
6	-do-	Zar Nosh s/o Bostan	GEPS Shah Dher (Shewa)	31-3-1992	5	FA	PTC	6380	-do-
7	-do-	Khan Zada s/o Shereen Zada	GEPS Salim Khan	22-2-1993	5	FA	PTC	5900	-do-
8	-do-	Fazal Naeem s/o Fazal Rahim	GEPS By Kot	29-3-1992	5	FA	PTC	6060	-do-
9	-do-	Mohammad Ali s/o Khamudin	GEPS Zakerya Khurd	15-9-1992	5	FA	PTC	5900	-do-
10	-do-	Abdur Rahman s/o Mir Hassan Shali	GEPS No. Yar Hussain	13-5-1992	5	D.Co m	PTC	6060	-do-
11	-do-	Qaisar Khan s/o Karim Khan	GEPS Rashid Abad (Ygb)	2-11-1988	5	FA	PTC	6860	-do-

Supdt:  
Executive Distt. Officer  
(E.S) Ed. Peshawar

12	Tank	Inayat Nawaz s/o Mohammad Nawaz	GMKS Sheikh Hakim	24-9-1992	5	FA	PTC	5740	-do-
13	-do-	Azad Khan s/o Zafar Khan	GMKS Naseeb Khan	7-10-1992	5	FA	PTC	5900	-do-
14	-do-	Kainatullah s/o Ghausullah	GMKS Gul Mohammad	15-1-2009	5	MA	PTC		-do-
15	-do-	Hikmatullah s/o Haq Nawaz	GMKS Ayub Abad	15-1-2009	5	BA	PTC		-do-
16	-do-	Aurangzeb s/o Sardar Khan	GMKS Chadrar	15-1-2009	5	D.Co m	PTC		-do-
17	Mardan	Liaqat Ali s/o Mian Said	GEPS Khani Kotey	12-3-1995	5	FA	PST		-do-
18	-do-	Karim Khan s/o Mohammad Salim	GEPS Matha Khas	29-8-1995	5	BA	PST		-do-

2. The Competent Authority has further been pleased to declare the cadre of Elementary Teachers as "Dying Cadre" and also direct that no appointment against the posts of Elementary Teachers will be made after these posts fall vacant as the Govt. of Khyber Pakhtunkhwa has notified comprehensive rules for recruitment of PST teachers.

3. In order to bring the Elementary Teachers in the main stream of teaching cadre the Competent Authority has further been pleased to direct that:-

- i) The existing under Matric Elementary Teachers will require to acquire the prescribed qualification i.e. FA/FSc 2<sup>nd</sup> Division with PTC or SSC with three years diploma in Education within five years.
- ii) The existing Matric PTC Elementary Teachers will require to acquire their FA/FSc qualification within three years.
- iii) FA/FSc Elementary Teachers will require to acquire their PTC within one year.


SECRETARY

Endst. No. SO(FR)/FD/10-22/(B)/2005.

Dated 21-2-2011

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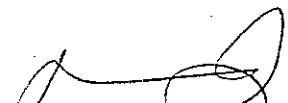
1. The Accountant General, Khyber Pakhtunkhwa Peshawar for information & necessary action.


  
SECTION OFFICER (FR)  
FINANCE DEPARTMENT.

Dated Pesh: the, 21-2-2011

Endst NO.SO(PE)4-3/Apptt/PTC/ET/Rules/Policy/Vol.III

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. All Executive District Officers E&SE in Khyber Pakhtunkhwa.
3. Accountant General, Khyber Pakhtunkhwa, Peshawar.
4. All District Accounts Officers in Khyber Pakhtunkhwa.
5. P.S to Minister E&SE Khyber Pakhtunkhwa, Peshawar.
6. P.S to Secretary Finance Department.
7. PS to Secretary E&SE Department.

  
(MOHAMMAD AYUB KHAN)  
SECTION OFFICER (PRIMARY)

  
**Supdt:**  
Executive Distt: Officer  
(E&S) Education Mardan