

16.2.2015

Clerk of Mr. Khalid Rahman, Advocate present and submitted that his senior is busy before the Hon'ble High Court. He requested for adjournment and submission of Wakalatnama. Therefore, case is adjourned to 09.3.2015 for the same.

  
MEMBER




09.03.2015

Counsel for the appellant present. Learned counsel for the appellant requested for adjournment as he is to submit the grievances of the appellant in the format of appeal. The office shall re-fix the case when the proposed appeal is submitted by the learned counsel for the appellant.

  
Chairman

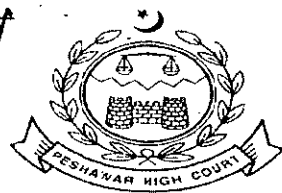
Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_  
Case No. 1337/2014

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	<p style="text-align: center;">13/11/2014</p> <p style="text-align: center;">15-01-2015</p> <p style="text-align: center;">16.1.2015</p>	<p>The present appellant initially went in Writ Petition before the Hon'ble Peshawar High Court and the Hon'ble High Court vide its order dated 27.10.2014 while treating the Writ Petition into an appeal and has sent the same to Tribunal for decision in accordance with law. The same may be entered in the Institution register and put up to the Worthy Chairman for further order please.</p> <p style="text-align: right;">   REGISTRAR </p> <p>This case is entrusted to Bench <u>II</u> for preliminary hearing to be put up there on <u>16-01-2015</u>.</p> <p style="text-align: right;">   CHAIRMAN </p> <p style="text-align: center;">   MEMBER </p> <p>Notice of general strike received from the Khyber Pakhtunkhwa Bar Council. Notice be issued to appellant and his counsel. To come up for preliminary hearing on 16.2.2015.</p>

909  
13-11-14

**THE  
PESHAWAR HIGH COURT  
PESHAWAR**



**Ph: No. 091-9210149-158**  
**Ext: No. 394**

**No. 19124 /Judl:**

**Dated Peshawar the 11-11 2014**

**From**

The Additional Registrar (J),  
Peshawar High Court,  
Peshawar.

**To**

The Registrar,  
KPK Service Tribunal,  
Peshawar.

**Subject** Writ Petition No. 3073-P/2014.

**Muhammad Sher Khan & others** -----Petitioners

**Versus**

**Government of KPK & others** -----Respondents

\*\*\*\*\*

**Memo:**

I am directed to send herewith the titled case in original alongwith all annexures & copy of judgment dated 27-10-2014, passed by Division Bench of this Court, for compliance.

  
**ADDITIONAL REGISTRAR (J)**  
10/11/14

**Encl:**

As above.

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**JUDGMENT SHEET**  
**PESHAWAR HIGH COURT, PESHAWAR**  
**JUDICIAL DEPARTMENT**

Writ Petition Nos.3073-P & 2297 of 2014.

**JUDGMENT**

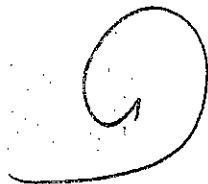
Date of hearing.....27-10-2014.....

Petitioner(s) by *Mr. Nazir Ahmad, Advocate.*

Respondent(s) by *Syed. Qaiser Ali Shah, A.A. along with  
Director E&S Education in person.*

**YAHYA AFRIDI, J.** Through this single judgment, this Court proposes to dispose of two Writ Petitions and one Contempt of Court Petition, as all have arisen out of common questions of law and facts. The particulars of the petitions are:-

1. W.P.No.3073-P/2014,  
(Muhammad Sher Khan and 9 others..Vs..Government of Khyber Pukhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar and another).
2. W.P.No.2297-P/2014,  
(Mian Zia-ur-Rehman..Vs.. Government of Khyber Pukhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar and 71 others).
3. COC No.306-P/2014,  
(Mian Zia-ur-Rehman..Vs..Afzal Latif and others).



2. In Mian Zia-ur-Rehman's case (W.P.No.2297-P/2014), the petitioners are seeking:

*"It is, therefore, prayed that Notification/ Working paper dated 23.12.2013 may graciously be declared illegal, void ab-initio and ineffective against the rights of the petitioners.*

*Secondly as a consequential relief, the respondents may graciously be directed to follow the prescribed rules regarding 4% promotion quota in letter and spirit and that the petitioners may be given their due rights and place for promotion under Khyber Pukhtunkhwa Civil Servant (Appointment, Promotion & Transfer) Rules, 1989."*

While, in Muhammad Sher Khan's case (W.P.No.3073-P/2014), the petitioners seek the constitutional jurisdiction of this Court praying:-

*"It is, therefore, prayed that impugned Notification dated 24.07.2014 may graciously be declared illegal, void ab-initio and ineffective against the rights of the petitioners and as a consequential relief, the respondents may graciously be directed to follow the Notification dated November, 13 2012 and the prescribed rules regarding 4% promotion quota in letter and spirit and the criteria and that the petitioners may be given their due right and place for promotion under Khyber Pukhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989."*

3. During the pendency of the aforementioned petitions, Mian Zia-ur-Rehman moved an application seeking to initiate contempt proceedings against the named respondents therein for violating and dis-obeying the orders dated 29.4.2014 of this Court in an earlier petition filed by Mian Zia-ur-Rehman (W.P.39-P/2014).

4. The brief and essential facts leading to the present petitions, in chronological order are as under:-

**Prior to 13.11.2012**

Secondary School Teachers (BPS-16), were all appointed through initial recruitment.

**13.11.2012**

The Provincial Government vide Notification No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre introduced method of recruitment to the post of Secondary School Teachers ("**SST**") (BPS-16); 50% by initial recruitment and 50% by promotion on the basis of seniority-cum-fitness ("**Rules**"). In the quota allotted for promotion, 40% were to be from amongst the Certified Teachers (CT), 4% from amongst the Drawing Masters, 4% from amongst the Physical Education Teachers, 15% from amongst the Instructional Material Specialists.

**29.4.2014.**

The writ petition filed by Mian Zia-ur-Rehman (W.P.No.39/2014) was decided in terms:-

*"Lest this Court passes any finding which may prejudice the case of the petitioners pending before the respondents, suffice it to state that the respondents are directed to follow the rules applicable in letter and spirit at the time when the promotions are to take place.*

*This is the mandate of law that the rules which are applicable at the time of promotion have to be followed without any discrimination or favour. Accordingly, these petitions are disposed of with the above observation."*

**10.7.2014**

The respondents Department moved a *Summary*, wherein the Provincial Government had

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proposed to introduce certain changes in the promotion criteria to the posts of Secondary School Teachers (BPS-16). Zia-ur-Rehman challenged the said *Summary* through a constitutional petition (W.P.No.2297-P/2014).

**24.7.2014**

The Provincial Government vide Notification No.SO(PE)4-5/SSRC/Meeting/2013/Teaching Cadre amended the Rules for promotion to the post of Secondary School Teachers (BPS-16) ("*Amended Rules*"). Muhammad Sher and 9 others challenged the amended Rules through a constitutional petition (W.P.No.3073-P/2014).

**4.9.2014 and 14.10.2014.**

Seventy two teachers, who had been considered for promotion under the amended Rules, applied and were impleaded by this Court, as respondents in W.P.No.2297/2014.

5. The Worthy counsel for the petitioners vehemently argued that there are more than 3,400 SST (BPS-16) posts lying vacant and these vacancies were available when Rules were prepared; that promotion in different cadres are held by the respondent in accordance with Rules; that Rules are applicable and extended to the petitioners for promotion to the post of SST (BPS-16) as the petitioners promotion was due prior to that date and the petitioners were eligible for such promotion; that the amended Rules are detrimental to the right of the petitioners and is discriminatory and is against the fair chance of promotion to the petitioners; that any Notification, if not beneficial, has no retrospective effect. Reliance was placed on **Senior Member**



BOR and others' case (2012 SCMR 864), Govt: of KPK and others' case(2012 SCMR 619) and Collector Customs and Central Excise, Peshawar and others' case(1996 SCMR 83).

6. In rebuttal, the Additional Advocate General and the Worthy counsel for the added private respondents not only opposed the contentions of the petitioners on merits but raised preliminary objections on the maintainability of the present petition and the jurisdiction of this Court to entertain the present petition, as they related to terms and conditions of service of the petitioners.

7. It would be pertinent to note that Mr. Muhammad Rafiq Khattak, the Worthy Director Elementary and Secondary Education, Khyber Pukhtunkhwa also appeared and assisted the Court in the present petitions. He emphasized that the amended Rules were introduced to create a promotion path for a Certified Teacher entering the service may by dint of his performance be promoted upto BPS-20. He further emphasized that Certified Teachers (BPS-9) were in block upgraded to BPS-15, out of which 1/3 were further promoted to Senior Certified Teachers in BPS-16. He also emphasized that fifty five thousand promotions had





already been carried out from BPS-15 to BPS-16 throughout the Province.

8. Valuable arguments of the learned counsel for the parties were heard and the record perused with their assistance.

9. Before this Court considers the petitions on merits, it would be essential to first decide the preliminary jurisdictional objection raised by the respondents in view of the express bar provided in Article 212 of the Constitution of Islamic Republic of Pakistan, 1973 ("Constitution").

10. The constitutional bar imposed upon this Court under Sub-Article (2) of Article 212 of the Constitution reads as under:-

*"212. Administrative Courts and Tribunals.*

*(1) Notwithstanding anything hereinbefore contained the appropriate Legislature may by Act provide for the establishment of one or more Administrative Courts or Tribunals to exercise exclusive jurisdiction in respect of—*

*(a) matters relating to the terms and conditions of persons who are or have been in the service of Pakistan, including disciplinary matters;*

*(b) matters relating to claims arising from tortuous acts of Government, or any person in the service of Pakistan, or of any local or other authority empowered by law to levy any tax or cess and any servant of such authority acting in the discharge of his duties as such servant;*  
*or*

(c) matters relating to the acquisition, administration and disposal of any property which is deemed to be enemy property under any law.

(2) Notwithstanding anything hereinabove contained, where any Administrative Court or Tribunal is established under clause (1), no other court shall grant an injunction, make any order or entertain any proceedings in respect of any matter to which the jurisdiction of such Administrative Court or Tribunal extends:

*Provided that the provisions of this clause shall not apply to an Administrative Court or Tribunal established under an Act of a Provincial Assembly unless, at the request of that Assembly made in the form of a resolution, Parliament by law extends the provisions to such a Court or Tribunal.*

(3) .....

(Emphasis provided)

11. The above constitutional provision, opening with the “*non-obstante*” clause, expressly bars all Courts, including the High Court to take cognizance of matters, which can be agitated and adjudicated before an administrative tribunal constituted and functioning under the law. This essential principle has been eloquently explained in the authoritative judgment of this Court in Mian Amanul Mulik's case (PLD 1981 Peshawar 1) and the decision of full bench Court of the Sindh High Court in Abdul Bari's case (PLD 1987 Karachi 290).

12. Now, in order to appreciate the scope of matters, which can be adjudged exclusively by an

administrative tribunal, we will have to refer to section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 ("*Act of 1974*"), which reads as under:-

1. Appeal to Tribunals.

Any civil servant aggrieved by any final order, whether original or appellate, made by a departmental authority in respect of any of the terms and conditions of his service may, within thirty days of the communication of such order to him or within six months of the establishment of the appropriate Tribunal, whichever is later, prefer an appeal of the Tribunal having jurisdiction in the matter:

Provided that:-

(a).....

(b) no appeal shall lie to a Tribunal against an order or decision of a departmental authority determining..

(i) the fitness or otherwise of a person to be appointed to or hold a particular post or to be promoted to a higher post or grade; or

(ii) the quantum of departmental punishment or penalty imposed on a civil servant as a result of a departmental inquiry, except where the penalty imposed is dismissal from service, removal from service or compulsory retirement; and

*(c) no appeal shall lie to a Tribunal against an order or decision of a departmental authority made at any time before the 1<sup>st</sup> July, 1969.*

*(Emphasis provided)*

13. In view of the above provision of the Act of 1974, the condition precedents for invoking the jurisdiction of the Tribunal are as under:-

- i. *Civil servant is to be aggrieved of a final order;*
- ii. *The said order has to be passed by the departmental authority; and*
- iii. *finally, the said order is to relate to terms and conditions of service of the aggrieved civil servant.*

14. As far as Mian Zia-ur-Rehman's case (W.P.No.2297-P/2014) is concerned, it is noted that the same relates to a *Summary*, which was yet to be approved by the competent authority and moreso, when the same was superseded by the amended Rules, the relief so sought by Mian Zia-ur-Rehman had in fact, become infructuous.

15. When we consider the circumstances leading to the filing of the Muhammad Sher Khan and other's case, it is noted that the same do not fulfil the first condition of there being a "*final order*" against which the jurisdiction of the Tribunal



*below post, of Associate Professor. The rules read with schedule will bear it out that the terms and conditions related to a higher post with which the respondent could have some connection only on being promoted or appointed and not prior to it. This matter has been reiterated in Muhammad Inshaullah's case and subsequently in Habib Bank Ltd: and others..Vs..National Industrial Relations Commission and others, C.A.No.316/1987; PLD 1988 SC 362. The respondent could claim no vested right nor could a change in the recruitment rules of the higher post can be said to operate against him retrospectively". As regards the efficiency or ascendancy of the PMDC Regulations and the Service Rules, the conclusion recorded by this Court reads "the respondent being a civil servant, the terms and conditions of his service are not governed by the Regulations made by the Pakistan Medical and Dental council but by the N.W.F.P., Civil Servants Act and N.W.F.P., Civil Servants Act and N.W.F.P. Civil Servants(Appointment, Promotion and Transfer) Rules, 1975. It is by incorporation of the qualifications in the rules that the civil servants like the respondent and other could claim to be governed by it and not independently of any such incorporation". The other judgment of this Court on the question of jurisdiction of the Service Tribunal to examine the validity of Service Rules and Notifications and the eligibility for promotion to higher posts is the case of Muhammad Anis.Vs..Abdul Haseeb, PLD 1994 SC 539. It was held that "the above matters pre-eminently fall within the exclusive jurisdiction of the Tribunal and therefore the High Court lead wrongly assumed jurisdiction in the present case, which did not vest in it".*

Similarly, in Muhammad Zafar Bhatti and others' case (PLD 2004 S.C. 317), it was observed:-

*"It has been held in the case of Iqan Ahmad Khurram (supra) that, if an objection is raised qua the validity of amendment in the rules by a civil servant on the ground that the same had adversely affected his right in the service as to promotion, jurisdiction of the High Court*

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*whether private respondents were eligible for consideration for promotion to Grade-18 as Assistant Collectors alongwith the private appellants. The above question could not have been decided without reference to the terms on which the private respondents were given higher grade, namely, Grade-17 upon the upgradation of the posts of Appriaser and the Principal Appraisers pursuant to the above order of the late President, Muhammad Ziaul Haq, which in turn will involve consideration of the above various notifications, rules relating to the appointment or promotion as Assistant Collectors of Customs and the interpretation of section 23 of the Civil Servants Act etc. The above matters pre-eminently fall within the exclusive jurisdiction of the Tribunal and, therefore, the High Court had wrongly assumed jurisdiction in the present case, which did not vest in it. The judgment of the learned Single Judge of the Sindh High Court and of the Lahore High Court relied upon by Mr. Ali Ahmed Fazeel, learned Sr. ASC, do not correctly enunciate the legal position."*

Likewise in Dr.S.Muhammad Zafar

Bukhari's case (PLD 1997 S.C.351), it was

confirmed by observing that:-

*"These very questions were agitated earlier before this Court in the case of Government of the N.W.F.P. Vs. Dr. Sh. Muzaffar Iqbal and others, C.A.46/P/1986, decided on 30.4.1988. It was held that "law has since been well-established that the rules applicable and the conditions required to be satisfied on the date of appointment are to be taken into consideration and not what were the requirements at an earlier date. It was further observed that "the respondent was claiming protection of the terms and conditions not of his service but that of the higher post. He could not have any vested right in respect of the terms and conditions of a post which was higher to the one which he was holding. The High Court was in error in considering that the terms and conditions of the appointment of the Professor were the terms and conditions of his appointment who was holding the next*

*below post, of Associate Professor. The rules read with schedule will bear it out that the terms and conditions related to a higher post with which the respondent could have some connection only on being promoted or appointed and not prior to it. This matter has been reiterated in Muhammad Inshaullah's case and subsequently in Habib Bank Ltd: and others..Vs..National Industrial Relations Commission and others, C.A.No.316/1987; PLD 1988 SC 362. The respondent could claim no vested right nor could a change in the recruitment rules of the higher post can be said to operate against him retrospectively". As regards the efficiency or ascendency of the PMDC Regulations and the Service Rules, the conclusion recorded by this Court reads "the respondent being a civil servant, the terms and conditions of his service are not governed by the Regulations made by the Pakistan Medical and Dental council but by the N.W.F.P., Civil Servants Act and N.W.F.P., Civil Servants Act and N.W.F.P. Civil Servants(Appointment, Promotion and Transfer) Rules, 1975. It is by incorporation of the qualifications in the rules that the civil servants like the respondent and other could claim to be governed by it and not independently of any such incorporation". The other judgment of this Court on the question of jurisdiction of the Service Tribunal to examine the validity of Service Rules and Notifications and the eligibility for promotion to higher posts is the case of Muhammad Anis.Vs..Abdul Haseeb, PLD 1994 SC 539. It was held that "the above matters pre-eminently fall within the exclusive jurisdiction of the Tribunal and therefore the High Court lead wrongly assumed jurisdiction in the present case, which did not vest in it".*

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*was barred by virtue of Article 212 of the Constitution. The civil servant should approach the Service Tribunal for redressal of his grievance, which was vested with the jurisdiction not only to go into the question of validity or vires of the rules qua right of such a civil servant but also the question of mala fides, if raised in the appeal. This view has been affirmed latter by this Court in the judgment in case of Khalid Mahmood Wattoo..Vs..Government of Punjab (supra). It appears that the law declared by this Court in the above cited reported judgments was not brought to the notice of learned Judge of the High Court, who decided the Constitutiona petition wherein reliance was place on the judgment of the High Court.*

*We are not inclined to adjourn the case. The arguments raised by learned Advocate General have force. The matter brought before the Court was relatable to terms and conditions of service. The respondents who are admittedly civil servants, their remedy was to file appeal before the Service Tribunal and jurisdiction of High Court in such matter was barred."*

16. Thus, in view of the "*ratio decidenti*" of the decisions rendered by the apex Court, it is but clear that the High Court is constitutionally barred to entertain a petition relating to challenge made to the rules concerning its terms and conditions of service of a civil servant, as is the case in the present petition.

17. Having reached the conclusion that this constitutional Court lacks the jurisdiction to entertain the petitions, it would not be appropriate to pass any finding on merits of the challenge made to "*vires*" of the impugned Rules and its application to



the petitioners in Muhammad Sher Khan's case (W.P.No.3073-P/2014).

18. As far as the petition for Contempt of Court, filed by Mian Zia-ur-Rehman is concerned, this Court finds that the named official respondents have not dis-obeyed the orders of this Court dated 29.4.2014 in W.P.No.39/2014, as the impugned promotions are being processed under the Notification No.SO(PE)4-5/ SSRC/ Meeting/ 2013/ Teaching Cadre, dated 24.7.2-014. Hence, the petition for contempt is mis-conceived and thus the notices issued are hereby recalled.

19. Accordingly, for the reasons stated above, this Court:

- i. *Declare grievance of the petitioners relating to their rights to be eligible and to be considered for promotion to a higher post are terms and conditions of service of the petitioners.*
- ii. *Declare that the exclusive jurisdiction to entertain and adjudicate upon the "vires" of Notification No.SO(PE)4-5/SSRC/Meeting/2013/Teaching Cadre dated 24.7.2014, concerning the right of the petitioners to be considered for promotion to a higher grade is vested in the Khyber Pakhtunkhwa Service Tribunal Act, 1974 and that this Court is constitutionally barred under*




*Article 212 of the Constitution of Islamic Republic of Pakistan, 1973 to take cognizance thereof.*

- iii. *Direct the office to retain copies of memo of Writ Petition bearing No.3073-P/2014 and transmit the same to the Khyber Pukhtunkhwa Services Tribunal for decision in accordance with law, subject to all just, legal and valid objections to be taken by the respondents regarding their maintainability before the Worthy Services Tribunal. Parties are directed to appear before the Khyber Pukhtunkhwa Services Tribunal on 18<sup>th</sup> November, 2014.*
- iv. *That W.P.No.2297/2014 having been infructuous is dismissed as such. The petitioner may seek his remedy, if so advised, before the competent forum in accordance with law.*
- v. *That the contempt of Court petition No.306-P/2014 in W.P.No.39-P/2014, being misconceived is dismissed and the notices issued are hereby recalled.*

Dated: 27-10-2014.

  
JUDGE

  
JUDGE

\*M.Gul\*

30/10/14  
01/11/14

**IN THE PESHAWAR HIGH COURT PESHAWAR**

W.P No. 3073/2014

*Service Appeal No. 1337/2014*

Muhammad Sher Khan and others **VERSUS** Govt: of KPK and another.

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*Muhammad Sher Khan*  
Petitioners

Through

*Nazir Ahmad*  
11.10.2014  
Nazir Ahmad  
Advocate, Peshawar

FILED TODAY  
Deputy Registrar  
11 OCT 2014

①

**IN THE PESHAWAR HIGH COURT PESHAWAR**

W.P No 3073 /2014

*Service Appeal no. 1337/2014*

1. Muhammad Sher Khan S/o Muhammad Karim Khan (Senior Physical Education Teacher) GHS Mohabat Abad Mardan
2. Mussarat Jabeen D/o Muhammad Saeed (Senior Physical Education Teacher) M.A M.Ed, GGHS City Railway Station Peshawar City
3. Sheheryar Khan S/o Irshad Khan (Physical Education Teacher)GMS Jungara Gujarat, Mardan
4. Muhammad Islam S/o Zardad Khan (Physical Education Teacher) GMS Kot Ismail Zai Mardan
5. Mian Zia-ur-Rehman S/o Mian Noor-ul-Huda, (Senior Physical Education Teacher) MSc B.Ed GHSS city no 2 Peshawar
6. Allah Nawaz S/o Jan Muhammad (Physical Education Teacher) M.A. M.Ed GHS Haleen Zai Charsadda
7. Qayum Khn S/o Amir Akbar (Physical Education Teacher) GMS Laram.
8. Hadi Khan S/o Malak Zamin Khan (Physical Education Teacher) GMS Warsak
9. Rahim Bakht S/o Karim Bakht (Physical Education Teacher) GHS Dhrean Kashmir District Dir.
10. Noor Ali Khan S/o Muhammad Said (Physical Education Teacher)GHS Ouch.....**Petitioners.**

**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar
2. Director Elementary & Secondary Education KPK, Dabgari Garden Peshawar.....**Respondents**

**WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN, 1973 READ WITH ARTICLE 4.5 AND 25 OF THE CONSTITUTION OF PAKISTAN.**

FILED TODAY  
Deputy Registrar  
11 OCT 2014

Respectfully Sheweth:-

1. That the Petitioners are PETs (Physical Education Teachers BPS-15) and SPETs (Senior Physical Education teachers BPS-16) and were recruited as Physical teachers on the basis of Diploma in P.E.T
2. That the Petitioners improved academic qualifications and got Bachelor and Master Degrees in Education. *(The qualification of the entire Petitioner is attached as Annexure A).*
3. That the services of Petitioners are governed by KPK Civil Servant (Appointment, Promotion and Transfer) Rules 1989 which are duly notified and extended to all of them.
4. That vide Notification No SO (PE)4-5/SSRC/Meeting/2012/Teaching Cadre dated Peshawar the November 13, 2012 by the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department and that according to the Appendix the minimum qualification and experience for initial appointment for Secondary School Teacher (SST) is mentioned as below.

S. No	Nomenclature of the Post	Minimum qualification & experience for the initial appointment or transfer	Age Limit	Method of recruitment

FILED TODAY  
 Deputy Registrar  
 11 OCT 2014

1.	Secondary School Teacher (BPS-16)	<p>(i) Second Class Bachelor Degree with two subjects as Chemistry, Botany, Zoology, Physics, Mathematics, Statistics, Humanities and other equivalent groups from a recognized University :</p> <p><b>OR</b></p> <p>(ii) M.A in Education or Bachelor's Degree in Education from a recognized University.</p>	18 to 35 years	<p>(a) Fifty Percent by promotion on the basis of seniority-cum-fitness in the following manner:-</p> <p>(i) Forty percent from amongst the Certified Teachers (Agriculture), Certified Teachers (Industrial Arts) and Certified Teachers (Home Economics) with least five years service as such and having qualification mentioned in column No. 3.</p> <p>(ii) Four percent from amongst the Drawing Masters with at least five years service as such and having qualification mentioned in column No.3.</p> <p><i>(iii) Four percent from amongst the Physical Education teachers with at least five years service as such and having qualification mentioned in column No 3</i></p>
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**Annexure B**

5. That this is the mandate of law that the rules which are applicable at the time the Petitioners were eligible for promotion have to be followed without any discrimination or favour and with such legitimate expectancy the Petitioners were waiting for theirs turn.
6. That the Respondent no 1 in disregard of the earlier notification dated November 2012 and vested right of the Petitioners issued another Notification dated 24<sup>th</sup> July 2014 by omitting the prescribed quota meant for the Petitioners and by changing the combination of subjects for them have attempted to effect substantial rights of the Petitioners by misfitting them for the promotion and deprived them of equal opportunities of promotion and are going to finalize the promotion on the new format which is as under:

**Notification dated 24.7.2014**

No .So (PE) 4-5/SSRC/Meeting/2013/Teaching Cadre:- In pursuance of provisions contained in sub rule(2) of rule 3 of the Khyber Pakhtunkhwa Civil

FILED TODAY  
 Deputy Registrar  
 11 OCT 2014

Servants (Appointment, Promotion and transfer) Rules, 1989, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notifications No.SO(G)S&LD/1-28/2003/Vol-II dated, 09.04.2004 Notification No .SO (G)S&L/1-69/06/Vol-1/DPE/LIB dated, 13-11-2007, and Notification No.SO(PE) 4-5/SSRC/meeting/2012/teaching Cadre, dated 13.11.2012, the following further amendments shall be made, namely:

**AMENDMENTS**

1	2	3	4	5
1 B	secondary school teacher (BPS-16)	<p>I. At least second class bachelor Degree's from a recognized university on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology)</p> <p>(b) (Physics, Maths "A" or "B" or Statistics)</p> <p>(c) (Humanities and other equivalent groups at degree level with English as compulsory subjects;</p> <p>And</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education or equivalent qualifications from a</p>	21 to 35 years	<p>1. Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner:</p> <p>(a) forty five per cent from amongst the Senior Certified Teachers (BPS-16) with at least five years service as Senior Certified teacher and having qualification mentioned in column No3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers, with at least five years service as such and having qualification mentioned in column No 3;</p> <p>(b) four per cent from amongst the Senior Drawing</p>

FILED TODAY  
Deputy Registrar  
11 OCT 2014

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		recognized university		Masters (BPS-16), with at least five years service as senior Drawing Masters and Drawing Masters and having qualification mentioned in column No 3:
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*Annexure C*

7. That the quota of Petitioners has been omitted from the working papers and the combination of the subjects are changed just to deprive them from the change of their cadre from Physical Education Teacher to Secondary School Teachers (BPS 16) which amounts to discrimination and to eliminate further chances of the Petitioner up<sup>to</sup> the posts of Head Master, Principal and Subject Specialist etc.
8. That the Petitioners Appealed to the Respondent against this discrimination and treatment against law frequently but of no avail.....(**Annexure D**)
9. That the impugned notification misfit the Petitioners and did not allow them to be appointed or hold a post of Secondary School Teacher (BPS 16) hence come within the ambit of Section 4 Proviso (b)(i) of K.P. k Service Tribunal Act and is exempted from his Jurisdiction.
10. That being aggrieved and finding no other efficacious and proper remedy Petitioner invokes once again the Constitutional jurisdiction of this Honourable Court, inter alia, on the following grounds:-

**GROUND:-**

- A. That the modification in the previous notification Dated November 13, 2012 and issuing another Notification of 24<sup>th</sup> July 2014 depriving the Petitioners of vested right and misfitting them for the post of SST (BPS 16 and omitting 4% quota of the Petitioners is without lawful Authority, without jurisdiction and is of no legal effect hence such modification be set

FILED TODAY  
Deputy Registrar  
11 OCT 2014



6

- aside and declared against the law, discriminatory, arbitrary and against the law of equal opportunities of promotion.
- B. Those Petitioners Physical Education teachers have been ignored for their promotion and posting as Secondary School Teachers where as they all fulfill the requisite qualification as mentioned in column No 3 of the Appendix i.e. they are MSc/B.Ed, M.A/B.Ed, M.A/M.Ed & MSC/M.Ed. and due to shortage of qualified staff mostly teaching to secondary classes.
- C. That according to the seniority list, the Petitioners are senior most officers and they are in the zone of promotion and that they are also fit for the posts but they are being discriminated by not giving them 04 % Quota as per the rules and by modifying the earlier notification.
- D. That there is plethora of judgments of the Honorable Apex Court on the point that notification/executive orders could only operate prospectively and not retrospectively. At the time of the impugned notification Petitioner has already gained legitimate expectancy, so quota meant for the Petitioners cannot be unilaterally withdrawn. (2012 SCMR pare-874).
- E. That the impugned notification by the Respondents is in violation of factual and legal position which amounts to exploitation and against the fundamental principles that every citizen shall be dealt with according to his ability and work.
- F. That the impugned notification is detrimental to the interest and legal rights of the Petitioners which is liable to be corrected, as Petitioners attained the right of Locus Poenitentiae and once it has taken legal effect and created certain rights in favour of the Petitioner then it cannot be withdrawn further subjects/combination once studied in 90 cannot be changed in 2014 or afterwards.
- G. That the Petitioners have not been treated equally before law and have been discriminated malafidely and with ulterior motive.
- H. That the impugned notification is without lawful authority, illegal, void ab-initio, malafide with ulterior motive and of no legal effect.

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Deputy Registrar  
11 OCT 2014

- I. That the impugned notification smacks arbitrariness, deviation from the normal procedure of law as the qualifications already acquired by the Petitioners for promotion to SST shall not be against a group specific.
- J. That in the impugned notification quota reserved for others is maintained and the same is with criteria but the quota of the Petitioner and criteria is changed which transpire the malafide of the Respondent against the Petitioners and have not acted in a just and transparent manners..
- K. That the Petitioners have not been dealt with in accordance with law and Constitution of Islamic Republic of Pakistan, they enjoy the protection of law under Article 4.5 and 25 of the Constitution to be equal before the law and entitled to equal protection of law, whereas in the instant case with malafide and ulterior motive they have been discriminated and deprived of their legitimate right.
- L. That the Rules which enable the Respondent to prescribe qualification and conditions for any post is delegated and the Respondent cannot travel beyond the scope of delegated power and it cannot issue any notification which is against the object of the original Rules.

Prayer:

It is, therefore, prayed that impugned notification dated 24.07.2014 may graciously be declared illegal, void ab-initio and ineffective against the rights of the Petitioners and as a consequential relief, the Respondents may graciously be directed to follow the notification November,13 2012 and the prescribed rules regarding 04% promotion quota in letter and spirit and the criteria and that the Petitioner may be given their due right and place for promotion under Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion & Transfer) Rules 1989.

*Alloch*  
Petitioner

*Muhammad Saad*

Through

*Nazir Ahmad*  
11/16/14  
Nazir Ahmad  
Advocate, Peshawar.

FILED TODAY  
Deputy Registrar  
11 OCT 2014

INTERIM RELIEF

8

May it please your Lordship:

It is respectfully prayed that by way of Interim Relief, during pendency of this Writ Petition the operation of impugned notification dated 24.07.2014 may kindly be suspended till final decision of this Writ Petition

**OR**

No case of any other employee shall be process in accordance with the notification dated 24.07.2014 till the final decision of this Writ Petition

*Mahesh*  
*Atleh*  
Petitioners

Through

*Nazir*  
Nazir Ahmad  
Advocate, Peshawar.

**CERTIFICATE**

Certified that no such Writ Petition has earlier been filed in this Honourable Court on behalf of the Petitioner.

*Nazir*  
Advocate

**BOOKS RECOMMENDED**

1. Constitution of Islamic Republic of Pakistan, 1973.
2. Transfer, promotion and recruitment Rules 1989.
3. Any other law or case as per need.

*Nazir*  
Advocate

FILED TODAY  
Deputy Registrar  
11 OCT 2014

IN THE PESHAWAR HIGH COURT PESHAWAR

W.P No 3073 / 2014

9

Muhammad Sher Khan and others **VERSUS** Govt: of KPK and another.

Affidavit

I Nazir Ahmad Advocate Peshawar High Court, Peshawar on the instruction of my Clients Muhammad Sher Khan and others do hereby affirm and declare on oath that contents of this Writ Petition are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Honorable Court.

No. 3073.....

Certified that the above was verified on solemnly affirmation before me in office, this..... 11.10.2014 day of..... Oct..... 2014 by..... Nazir Ahmad Adk s/o..... Adv..... Peshawar who was identified by..... [Signature] Who is personally known to me:

[Signature]  
Oath Commissioner  
Peshawar High Court, Peshawar.

[Signature]  
11-10-2014  
Deponent

~~FILED TODAY~~  
Deputy Registrar  
11 OCT 2014

(10)

**IN THE PESHAWAR HIGH COURT PESHAWAR**

W.P No 3073/2014

Muhammad Sher Khan and others      **VERSUS**      Govt: of KPK and another.

**ADDRESSES OF PARTIES**

**Petitioner:-**

1. Muhammad Sher Khan S/o Muhammad Karim Khan (Senior Physical Education Teacher) GHS Mohabat Abad Mardan
2. Mussarat Jabeen D/o Muhammad Saeed (Physical Education Teacher) M.A M.Ed, GGHS City Railway Station Peshawar City
3. Sheheryar Khan S/o Irshad Khan (Physical Education Teacher) GMS Jungara Gujarat, Mardan
4. Muhammad Islam S/o Zardad Khan (Physical Education Teacher) GMS Kot Ismail Zai Mardan .
5. Mian Zia-ur-Rehman S/o Mian Noor-ul-Huda, (Senior Physical Education Teacher) MSc B.Ed GHSS city no 2 Peshawar
6. Allah Nawaz S/o Jan Muhammad (Physical Education Teacher) M.A. M.Ed GHS Haleen Zai Charsadda
7. Qayum Khn S/o Amir Akbar (Physical Education Teacher) GMS Laram.
8. Hadi Khan S/o Malak Zamin Khan (Physical Education Teacher) GMS Warsak
9. Rahim Bakht S/o Karim Bakht (Physical Education Teacher) GHS Dhrean Kashmir District Dir.
10. Noor Ali Khan S/o Muhammad Said (Physical Education Teacher)GHS Ouch

FILED TODAY  
Deputy Registrar  
11 OCT 2014

(11)

Respondents:-

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar.
2. Director Elementary & Secondary Education KPK, Dabgari Garden Peshawar.

*Mohd Saif*

*Atleh Saif*

Petitioners

Through

*Nazir Ahmad*  
11-10-2014

Nazir Ahmad  
Advocate, Peshawar

FILED TODAY  
Deputy Registrar  
11 OCT 2014



# ABDUL WALI KHAN UNIVERSITY

MARDAN, PAKISTAN

## TRANSCRIPT

*Annexure*  
**(A)**

NATIONAL COLLEGE OF PHYSICAL EDUCATION, MARDAN  
MSc (HPE)

Name: Mohammad Sher Khan F: Name: Mohammad Karim Khan

**(12)**

Roll No: 1422

Reg. No: 10-AU-NCPEM-M-276

1st Semester (Fall, 2010)							
Title of Course	Total Marks	Marks Obtained	CR Hrs	NG	GP	GPA	Remarks
Measurement & Evaluation	100	75	3	3.5	10.5		
Research Methodology	100	79	3	3.9	11.7		
Sports Medicine	100	74	3	3.4	10.2		*
Seminar / Term Report	100	81	3	4	12		
<b>TOTAL</b>	<b>400</b>	<b>309</b>	<b>12</b>		<b>44.4</b>	<b>3.70</b>	<b>Promoted</b>
2nd Semester (Spring, 2011)							
Title of Course	Total Marks	Marks Obtained	CR Hrs	NG	GP	GPA	Remarks
Planning Administration & Mgt in P.E	100	71	3	3.1	9.3		
Sports Injuries & Rehabilitation	100	57	3	1.7	5.1		
Curriculum Development in P.E	100	66	3	2.6	7.8		
Viva	100	75	3	3.5	10.5		
<b>TOTAL</b>	<b>400</b>	<b>269</b>	<b>12</b>		<b>32.7</b>	<b>2.73</b>	<b>Passed</b>
			<b>24</b>		<b>77.1</b>		
<b>CGPA</b>						<b>3.21</b>	

Errors & Omissions are subject to subsequent rectification  
Result Declaration Date: - Sep 21, 2011  
Prepared by: Ijaz Ahmad  
Checked by: Shahzad Khan

*[Signature]*  
**Controller of Examinations**

*[Handwritten signature]*

Serial No.

# ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

## PROVISIONAL RESULT CARD



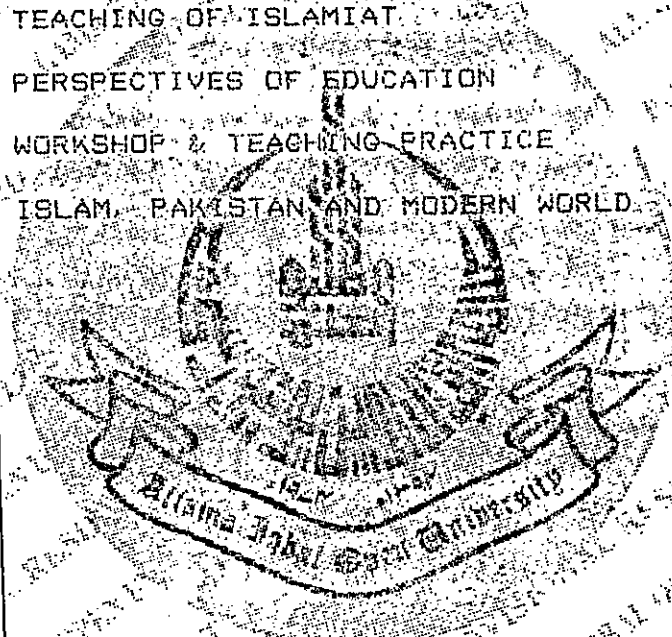
Name MOHAMMAD SHER KHAN  
 Fathers's Name MOHAMMAD KARIM KHAN  
 Address MOH AMIN ABAD NISSATA ROAD  
 Tehsil BEJLI GHAR C/O ZIA BOOK SELLER  
 District MARDAN  
 has successfully completed BACHELOR OF EDUCATION (B. ED)

Roll No. U682863  
 Registration No. O6NMN3244  
 Final Semester SPR-2008

73

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT-06	0651	ENGLISH	100	70
AUT-06	0514	EVALUATION, GUIDANCE & RESEARCH	100	58
AUT-06	0513	SCHOOL ORGANIZATION	100	56
AUT-06	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	67
SPR-07	0517	TEACHING OF PAKISTAN STUDIES	100	65
SPR-07	0654	TEACHING OF ISLAMIAT	100	66
AUT-07	0512	PERSPECTIVES OF EDUCATION	100	69
AUT-07	0655	WORKSHOP & TEACHING PRACTICE	100	96
SPR-08	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	67



Attested  
ajr

CREDITS: 6

Total Marks / Obtained 900 / 614

Result Declared on FEBRUARY 06, 2009

Percentage / Grade 68 B

Date of issue FEBRUARY 14, 2009

*H*  
**Controller of Examinations**

**Disclaimer:**

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.



# Alama Iqbal Open University Islamabad



Handwritten mark resembling the number '74' inside a circle.

Serial No. 173470

Certified that Mr. / Ms. **MOHAMMAD SHER KHAN**


Son / Daughter of **MOHAMMAD KARIM KHAN**

Registration No: **06NMN3244** Roll No: **U682863**

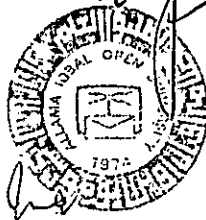
having successfully completed the prescribed requirements  
in semester **SPRING 2008** is awarded the degree of

## Bachelor of Education (B.Ed)

He / She has secured <sup>68</sup> % marks and has been placed in **B** grade.

  
CONTROLLER OF EXAMINATIONS



  
VICE-CHANCELLOR

Result declared on: February 06, 2009

Date of Issue: March 01, 2013

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY



# NATIONAL COLLEGE OF PHYSICAL EDUCATION MARDAN

Affiliated with Gomal University Dera Ismail Khan  
N-W.F.P  
(Pakistan)



Session 2008-09

Roll No. 3264

S.No. 71

## PROVISIONAL CERTIFICATE

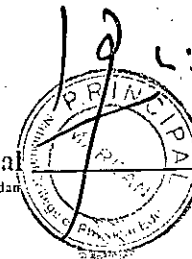
This is to certify that Mr./Miss/Mrs. Muhammad Sher Khan S/O of Muhammad Karam Khan  
of the District/Agency Mardan has  
passed B.P. Ed examination held in October 2009  
in the subject of Bachelor of Physical Education  
He/She was placed in 1st Division, securing 513 Marks out of 750

The examination was taken as a whole.

Date 03/12/2009

*Assistant  
Principal*

Principal  
N.C.P.E., Mardan



Prepared by J. Ahmad

Note: This certificate is issued without any error or omission

12/12/09

# University of Peshawar (Pakistan)



15

Session: Annual 2005

MOHAMMAD SHER KHAN

Son of

MOHAMMAD KARIM KHAN

and a

Candidate (Candidate of District Mardan) having passed the

prescribed examination held in August 2005 is this day admitted by the University of Peshawar to

the Degree of Master of Arts in Urdu in 2nd Division

The examination was taken In Parts

Registration No. 95-PC-42611

Roll No. 27859

Q.M.C. No. 16182-7793844-7

Result Declaration March, 11, 2004

*Handwritten signature*



053603



*Handwritten signature*  
Vice-Chancellor

Registrar

*Handwritten initials*



# UNIVERSITY OF PESHAWAR

(16)

(Pakistan)

Session ANNUAL 1998

MUHAMMAD SHEER KHAN

SON OF

MUHAMMAD KARIEM KHAN

and a student

of District of Mardan

having passed the prescribed

examination held in August, 1998

is this day admitted by the University

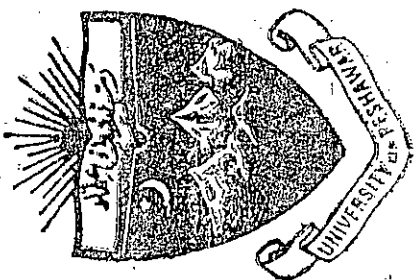
of Peshawar to the Degree of

## Bachelor of Arts

in the SECOND Division

The Examination was taken as a whole / ~~in parts~~

*M. Saleem*  
Registrar



Serial No 055308

Registration No. 95-PC-48511

Roll No. 83615

Result declared on DECEMBER 28, 1998

Countersigned

*J. L. Khan*

Director

*17*

UNIVERSITY OF PESHAWAR  
(Pakistan)

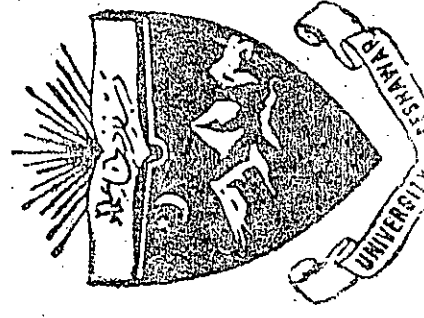
17

Session ANNUAL 1996

MUSARAT JABEEN / DAUGHTER of MUHAMMAD SAIED and a student

of DISTRICT PESHAWAR having passed the prescribed examination held in August, 1996, is this day admitted by the University of Peshawar to the Degree of Bachelor of Arts in the SECOND Division

The Examination was taken as a whole / in parts



*[Signature]*

*[Signature]*  
Registrar

Countersigned

*[Signature]*

Vice-Chancellor

Serial No 042813

Registration No. 864-6200

Roll No. 81674

Result declared on MARCH 21, 1997

الجامعة الإسلامية

# University of Peshawar

(Pakistan)

18

Session ANNUAL 2002

Mohamud Azeem Son/Daughter of Mohamad Saad

and a student/ private candidate of District Peshawar

having passed the prescribed examination held in August, 2002 is this day admitted by the University of Peshawar to the Degree of

## Master of Arts

in

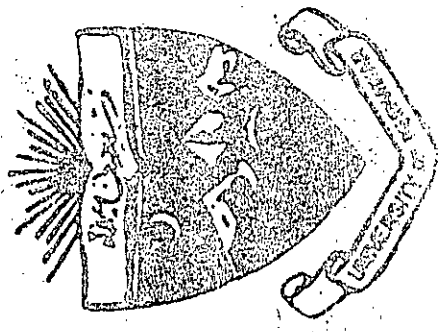
ISLAMIYAT

in Second Division

The Examination was taken as ~~whole~~ in parts

*Atiqes*  
Registrar

*Atiqes*



Serial No. 0062118

Registration No. 06-11-6210

Roll No. 24060

Result Declared on 26th Feb, 2003

REGISTERED

*Atiqes*  
Vice-Chancellor

No 014648

Registration No AUP (E)1654-2003

Al-Khair University



AL-KHAIR

19

Session 2003 - 2004

This is to certify that

Mussarat Jabeen D/O Muhammad Saeed

Has obtained the Degree of

Master of Education

in this University at the Examination held in August, 2004

*L. Rashid*  
Controller of Examinations

*Mussarat Jabeen*

*[Signature]*  
Chancellor

Anzaitarabad July 23, 2005

# Allama Iqbal Open University Islamabad



Serial No. 64733

19A

Certified that Mr. / Ms. MUSSARAT JABEEN

~~Son~~ / Daughter of MUHAMMAD SAEED

Registration No: 00-NPR-0771 Roll No: K-6061488

having completed the prescribed requirements in semester  
AUTUMN 2001

is awarded the degree of:

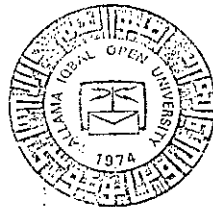
## Bachelor of Education (B.Ed)

He / She has secured 51 % marks and has been placed in C grade.

CONTROLLER OF EXAMINATIONS

Result declared on: August 12, 2002

ISLAMABAD. DATED: August 30, 2004



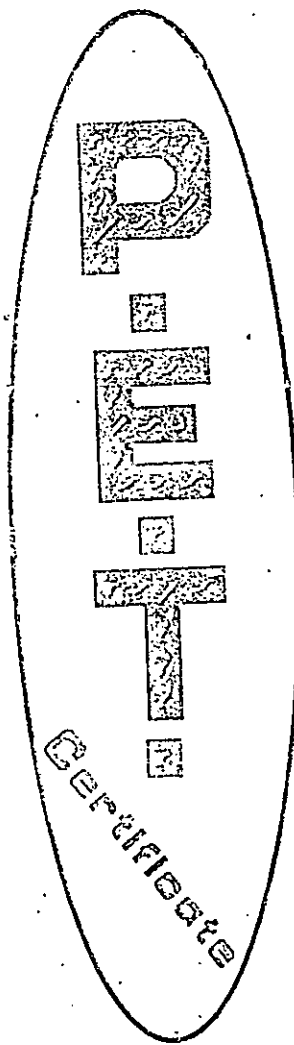
VICE-CHANCELLOR

THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT, ISSUED SEPARATELY



SCHOOLS & LITERACY DEPARTMENT, N.W.F.P., PESHAWAR

28



Serial No. 239 Session..... 2000 .....

Roll No. 115 Marks Obtained 743 / 1050

Division..... 1st .....

Certified that Mr./Mrs./Miss..... Shehar Yar Khan .....

Son/Daughter of..... Irshad Khan ..... is a student of

Govt. College of Physical Education Nooha (Kohat) .....

having passed the P.E.T. Examination held in..... 3.9.2000 ..... is

qualified himself/herself.

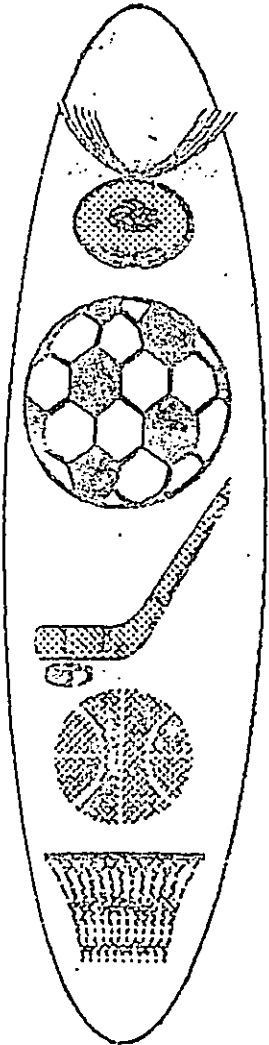
Prepared by..... [Signature] .....

Checked by..... [Signature] .....

Date of declaration Result..... 31.3.2001 .....

Date of Issue..... 10.7.2007 .....

Deputy Director (Examination)  
Schools & Literacy Department,  
N.W.F.P., Peshawar.



Attested  
Shaheroze  
G-10  
Peshawar

پاکستان

# UNIVERSITY OF PESHAWAR

(Pakistani)

(21)

Session: ANNUAL 2000

Sheem: YAN KUAN

Son/Banagher of

Inhab: HAN

District: HADDAN

and a student of private candidate of \_\_\_\_\_  
having passed the prescribed examination held in \_\_\_\_\_ January, 2001  
is this day admitted by the University of Peshawar to the Degree of

## Master of Arts

in

PASHTO

in

Group

Division

The Examination was taken as complete/ in parts

Serial No. 0062404

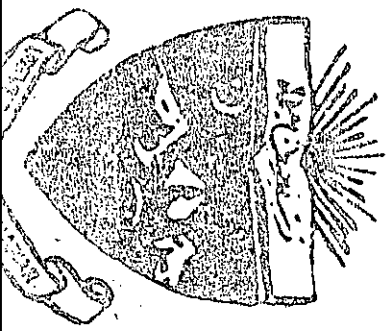
Registration No. 94-H-11097

Roll No.

24219

Result declared on: 24th May, 2001

*Chafiq*



Counsellor

Registrar

Vice-Chancellor

*Shiraf*

Attested  
Signature of Registrar  
Date: 24/5/2001

شہادت نامہ

# University of Peshawar (Pakistan)

Session Annual, 1997

SHEHARAN KHAN

Son

of IRSHAD KHAN

and a student

District Mardan

of \_\_\_\_\_  
examination held in August, 1997 is this day admitted by the University

## Bachelor of Arts

in the Second Division

The examination was taken successfuly / in parts.

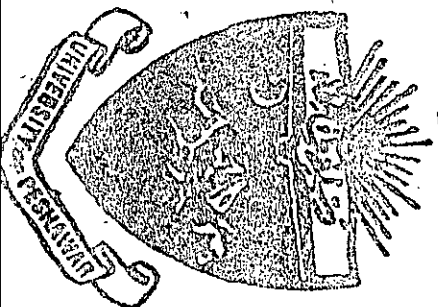
Serial No. 062493

Registration No. 94-4-11097

Roll No. 76261

Result Declared on 31st December, 1997

*Accepted*



*M. Javed Khan*  
Registrar

Countersigned

*Z. J. Khan*  
Dirce-Chancellor

*Attested*  
Shaher Khan  
Registrar  
Mardan.

22

KHYBER

KHYBER

23

College of Education Mardan

Affiliated With Abdul Wali Khan University, Mardan.

(K.P.K) Pakistan.

Provisional Certificate

Session Spring-2010

Mr. Miss Sheharyar Khan S / D of Itshad Khan

Resident of District Mardan has passed the bachelor of physical Education.

Examination held in June 2010 and placed in First Division

Securing Marks 616 out of 800

Registration No. 09-AWKUM-KCEM-M-02

Roll No. 82

Date of Issue 20-09-2010

*Attested*

*Kulshreshtha*

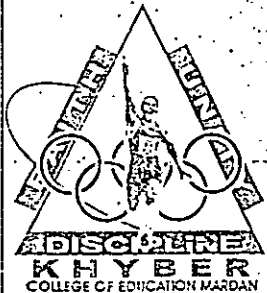
Principal

Khyber College of Education  
Mardan.

PRINCIPAL

Khyber College of Education  
Mardan

*Attested*  
*Shaherazade (SST)*  
C.U.S. Officer



Serial No.

72237

# ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

## PROVISIONAL RESULT CARD



Name **SHEHE YAR KHAN**  
 Fathers's Name **RISHAD KHAN**  
 Address **NOH. GORSIAN VILL SUJRAT P/O  
 SUJRAT**  
 Tehsil **MARDAN**  
 District **MARDAN**

Roll No **8659339**  
 Registration No **97NMN0744**  
 Final Semester **SPR- 2006**

291

has successfully completed **BACHELOR OF EDUCATION(B. ED)** Programme.

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 05	0513	SCHOOL ORGANIZATION	100	70
SPR- 05	0514	EVALUATION, GUIDANCE & RESEARCH	100	71
SPR- 05	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	60
SPR- 05	0551	ENGLISH	100	57
AUT- 05	0517	TEACHING OF PAKISTAN STUDIES	100	65
AUT- 05	0554	TEACHING OF ISLAMIAT	100	62
SPR- 06	0612	PERSPECTIVES OF EDUCATION	100	64
SPR- 06	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	59
SPR- 06	0655	WORKSHOP	100	90

Allama Iqbal  
Open University

CREDITS **6**

Total Marks / Obtained **900 / 598**

Result Declared on **JANUARY 25, 2007**

Percentage / Grade **66 B**

Date of issue **FEBRUARY 06, 2007**

**Disclaimer:**

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

**Controller of Examinations**

Attested  
Controller of Examinations  
01/13/07



ABDUL WALI KHAN UNIVERSITY  
MARDAN, PAKISTAN

TRANSCRIPT

KHYBER COLLEGE OF EDUCATION, MARDAN  
MSC (HPE)

25

Name: Shehryar Khan

F: Name: Irshad Khan

Roll No: 772

Reg. No: 09-AWKUM-KCEM-M-2

1st Semester (Fall, 2010)							
Title of Course	Total Marks	Marks Obtained	CR Hrs	NG	GP	GPA	Remarks
Measurement & Evaluation	100	70	3	3	9		
Research Methodology	100	75	3	3.5	10.5		
Sports Medicine	100	71	3	3.1	9.3		
Term Report / Seminar	100	88	3	4	12		
TOTAL	400	304	12		40.8	3.40	Promoted
2nd Semester (Spring, 2011)							
Title of Course	Total Marks	Marks Obtained	CR Hrs	NG	GP	GPA	Remarks
Planning Administration & Mgt in P.E	100	83	3	4	12		
Sports Injuries & Rehabilitation	100	60	3	2	6		
Curriculum Development in P.E	100	61	3	2.1	6.3		
Viva	100	55	3	1.5	4.5		
TOTAL	400	259	12		28.8	2.40	Passed
			24		69.6		

CGPA 2.90

Errors & Omissions are subject to subsequent rectification  
Result-Declaration Date: - Sep 21, 2011  
Prepared by: Ijaz Ahmad  
Checked by: Shahzad Khan

*Attested*

Controller of Examinations

*Attested*  
Signature  
Date



# ABDUL WALI KHAN UNIVERSITY

MARDAN PAKISTAN

18970 DETAILED MARKS CERTIFICATE

KHYBER COLLEGE OF EDUCATION, MARDAN  
MSC (HPE)

26

Name: Shehryar Khan

F: Name: Irshad Khan

Roll No: 772

Reg. No: 09-AWKUM-KCEM-M-2

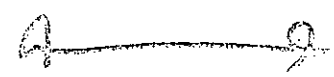
1st Semester (Fall, 2010)							
Title of Course	Total Marks	Marks Obtained	CR Hrs	NG	GP	GPA	Remarks
Measurement & Evaluation	100	70	3	3	9		
Research Methodology	100	75	3	3.5	10.5		
Sports Medicine	100	71	3	3.1	9.3		
Term Report / Seminar	100	88	3	4	12		
<b>TOTAL</b>	<b>400</b>	<b>304</b>	<b>12</b>		<b>40.8</b>	<b>3.40</b>	<b>Promoted</b>

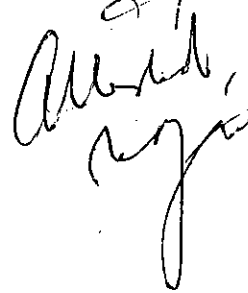
Errors & Omissions are subject to subsequent rectification

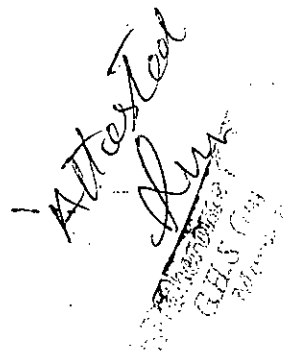
Result Declaration Date: - March 15, 2011

Prepared by: Ijaz

Checked by: Shahzad Khan

  
Controller of Examinations





**MOHAMMAD ISLAM**

S/o Zardad Khan

Mohallah New Muslim Abad, Barichum District Mardan,  
Khyber Pakhtunkhwa Pakistan.

Ph # +92 333 985 7957

27

**EXPERIENCE**

- Nineteen years' experience as a Teacher in various school of Government.

**EDUCATION**

Academic Qualification

Certificate	Year	Marks	Board / University
S.S.C	1985	532/850	University of Peshawar
F.A	1988	427/	University of Peshawar
B.A	1993	252/550	University of Peshawar
M.A	2011	532/1100	AWKU Mardan

Professional Qualification

Certificate	Year	Marks	Board / University
SDPE	1998	630/1100	Gomal University D.I Khan
B.Ed	2001	475/900	AIOU Islamabad
DMD	2007	956/1200	Sarhad University Peshawar
CT	1997	815/1200	Elementary College Gulbahar Peshawar
PTC	1993	60%	AIOU Islamabad

**PERSONAL INFORMATION**

Date of Birth : 04-09-1967  
 Domicile : Mardan  
 Marital Status : married  
 Religion : Islam  
 Nationality : Pakistani  
 CNIC : 16101-1251911-7

*Attended  
the job*

**LANGUAGES**

English, Pashto, Urdu



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

# University of Peshawar (Pakistan)

(28)

Session ANNUAL, 1984

MIAN CIA-UR-RAHMAN Son of NOOR-UL-HUDA and a student  
of PESHAWAR DISTRICT having passed the prescribed examination  
in SEPTEMBER 19 84, is this day admitted by the University of Peshawar  
to the Degree of

## Bachelor of Science

in the SECOND Division HE passed also in ISLAMIYAT  
as an Additional/Optional Subject.

The examination was taken as a whole/in parts

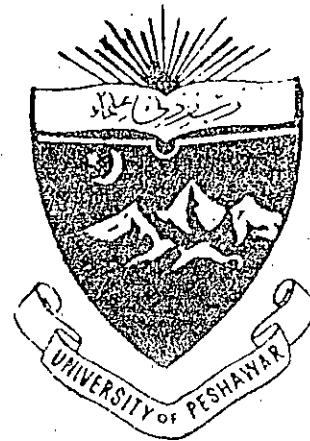
Serial No. 000001

Registered No. 82-P/A-3858

Roll No. 1201

15TH JANUARY 1985

*Attested  
by*



*[Signature]*  
Registrar

Countersigned

*[Signature]*  
Vice-Chancellor

# University of Jeshwar

(Pakistani)

Session Annual 1992

1st Zia-ur-Rahman

Son of

Muhammad Ali

Registrar District

of

1992

1992

having passed the prescribed Examination and a student

## Bachelor of Education

In the Division in Theory

In the Division in Teaching Practice

In the Division in Aggregate

passed also in GENERAL SCIENCE as an Additional / Optional Subject

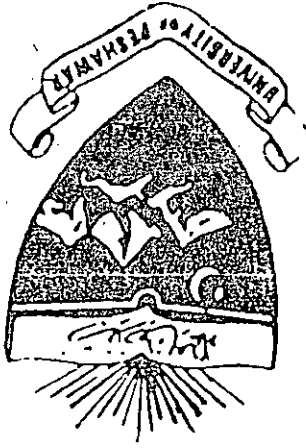
The examination was taken as a whole / in parts

Serial No 005166

Registered No. 00-04-0000

Roll No. 580 / 1

Result Declared on April 15, 1992



*M. A. Khan*

Prof. H. H. Hand  
Registrar

Counsellor

Vice-Chancellor

*(Signature)*



# UNIVERSITY OF PESHAWAR

(PAKISTAN)  
Passed/Re-appear/Compartment

## DETAILED MARKS CERTIFICATE

(30)

B.S.C. Examination, 1984 (Annual/Supplementary)  
Mr./Miss Muzia M. Rehman Roll No. 1201  
The candidate secured the following marks and has been placed in 52<sup>nd</sup> Division.

S U B J E C T S	Total No. of marks allotted	M A R K S O B T A I N E D	
		In figure	In words
Mathematics A course	150	76	Seventy six
Mathematics B course	150	68	Sixty eight
Statistics	150	78	Seventy eight
Islamiyat (OPT)	50	40	Forty only
Total	500	262	Two hundred Sixty two

The Examination was taken as-a-whole/in parts.

No. 18298

Dated. 13.5.85 1985

*Handwritten signature*

CONTROLLER OF EXAMINATIONS  
UNIVERSITY OF PESHAWAR  
PAKISTAN

No 019093

Registration No AUP (E)

# Al-Khair University



24

Session 2003 - 2004

This is to certify that

Ziaur Rahman S/O Noorul Huda

Has obtained the Degree of

Master of Education

at Al-Khair University at the Examination held in August, 2004

*Handwritten signatures and stamps:*  
S. B. 17 PDS-17  
GHS No. 244  
Peshawar City

Controller of Examinations

*Handwritten signature*

*Handwritten signature*

Chancellor

Muzaffarabad October 9, 2006

# GOMAL UNIVERSITY

DERA ISMAIL KHAN.

N. W. F. P.  
PAKISTAN.

32



## Provisional Certificate

This is to certify that Mr. / ~~Miss~~ / ~~Mrs~~ MIAN ZIA UR REHMAN.

Son / ~~Daughter~~ / ~~Wife~~ of NOOR UL HUDA.

of the Department / ~~Institute~~ of M.S.c MATHEMATICS

has passed (General Supply;88) FINAL Examination held in JANUARY, 1990

in the subject of MATHEMATICS

He / ~~She~~ was placed in SECOND

division, securing 922 marks out of 2000

The examination was taken ~~orally~~ / in parts.

Dera Ismail Khan.

Dated 8-5-1990.

*Attested*  
*Signature*

*Signature*

30/5/90  
CONTROLLER OF EXAMINATIONS  
Controller of Examinations  
Gomal University  
Dera Ismail Khan

33

# SCHOOLS & LITERACY DEPARTMENT, NWFP, PESHAWAR

P  
E  
T  
Certificate

Serial No. 1719

Session 1994

Roll No. 20

Marks Obtained 657 / 1050

Division Ist

Certified that Mr./Mrs./Miss Allah Nawaz

Son/Daughter of Jan Muhammad is a student of

Charsada

having passed the P.E.T. Examination held in 1994 is

qualified himself/herself.

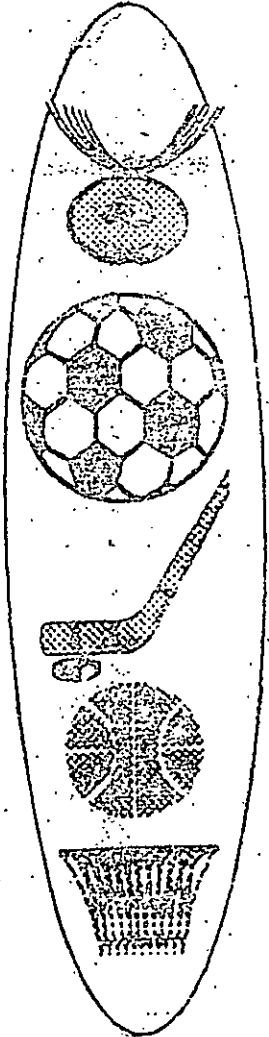
Prepared by.....

Checked by.....

Date of declaration Result 25/5/95

Date of Issue 25/12/2012

Head Master  
Govt High School  
Teem zai Charsada  
Deputy Director (Examination)  
Schools & Literacy Department,  
N.W.F.P., Peshawar.



# Allama Iqbal Open University Islamabad

34



Serial No. 33821

Certified that Mr. / Ms. **ALLAH NAWAZ**

Son / Daughter of **JAN MUHAMMAD**

Registration No: **99-NCA-0090**

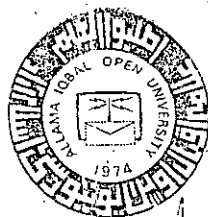
Roll No: **X-677025**

having successfully completed the prescribed requirements  
in semester **SPRING 2008** is awarded the degree of

*Master of Education (M. Ed.)*

He / She has secured **60** % marks and has been placed in **B** grade.

CONTROLLER OF EXAMINATIONS



VICE-CHANCELLOR

Result declared on: **March 17, 2009**

Date of Issue: **September 16, 2013**

Head Master  
Govt High School  
Haleem zal Charsadda

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY

No. 1-0121480

Open University



پنشنری

علاء محمد اقبال اوپن یونیورسٹی

40674

ALLAH HAWAZ

Regn. No.

99-HQA-0090

دبیرین

الہ نواز

Daughter of

JAW MUHAMMAD

جان محمد

has completed the prescribed requirements

کو مکمل کیا ہے۔

in 2000. is awarded the degree of

Bachelor of Education

بی۔ ایڈ

She secured 50 % marks and was placed

50 فیصد کی نمائندگی کی گئی ہے۔

in B grade.

Muz Chappeller

ڈائریکٹر

signed

Registered

Date: 22nd Dec, 2000

تاریخ: 22 دسمبر 2000

Controller of Examinations

کنٹرولر امتحانات

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

Head Master  
Govt. High School  
Hafeem Zal Charsadda



351B

# University of Peshawar (Pakistan)

351B

Session ANNUAL 1993 and a student

ALLAH HAWAZ  
SON OF JAN MUHAMMAD

of DISTRICT CHARSADDA having passed the prescribed examination held in APRIL, 1994 is this day admitted by the University of Peshawar, to the Degree of

## MASTER OF ARTS

### Division

in the SECOND URDU

The Subject of Examination being \_\_\_\_\_  
The Examination was taken as complete / in parts

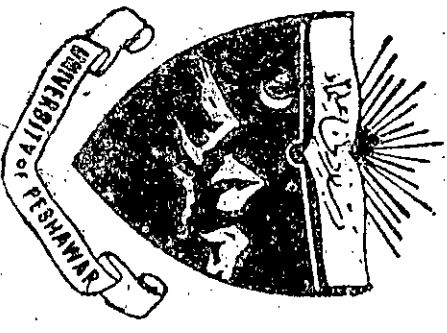
Serial No. 017487

Registration No. 86-P/A+22095

Roll No. 6362

Result declared on OCTOBER 18, 1994

*[Handwritten Signature]*



*[Handwritten Signature]*  
Headmaster  
Govt. High School  
Haleem Zai Charsadda

Countersigned  
*[Handwritten Signature]*  
Vice-Chancellor

*[Handwritten Signature]*  
Registrar

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

# University of Peshawar (Pakistan)

34-C

SESSION ANNUAL 1987

ALLAH NAWAZ / SON of JAN MOHAMMAD / and a student  
of PESHAWAR DISTRICT / having passed the prescribed examination  
held in FEBRUARY 19 88 , is this day admitted by the University of Peshawar  
to the Degree of  
**Bachelor of Arts**

in the SECOND Division

The examination was taken as ~~a whole~~ in parts.

Serial No. 011776

*Attested  
Muzaffar*

Registered No. 85-F/A-22036

Roll No. 7619



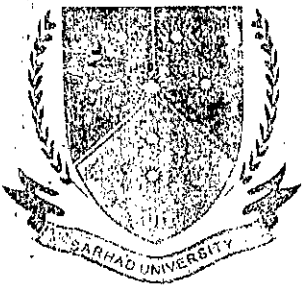
*Sankar*  
Head Master  
Govt High School  
Haleem zal Charsadda

*Muhammad Ahmad*  
Registrar

Countersigned

5TH AUGUST 19 88

*Muhammad Ahmad*  
Vice-Chancellor



# Sarhad University

OF SCIENCE & INFORMATION TECHNOLOGY, PESHAWAR

Serial Number SUIT-2013-PRO-1826

Date issued: December 07, 2013

## Provisional Certificate

34-D

This is to certify that Mr./Ms. Allah Nawaz  
son / daughter of Mr. Jan Muhammad  
registration number SUIT-10-01-59162  
is a regular student of the Sarhad University of Science and Information Technology,  
Peshawar in the session 2010 - 2013

Mr./Ms. Allah Nawaz has according to the result notification,  
issued by the University, passed the Master of Health & Physical Education - MSc.(HPE) - 2 Year  
Examination Annual/Supplementary held in 19 June - 08 July, 2013 and secured 2nd  
division, obtained 1027 marks out of 1850. He/she has already been issued  
a DMC by the Controller of Examinations. He/she will receive his/her degree in  
relevant convocation (if desired).

Mr./Ms. Allah Nawaz bears good moral character and his/her  
conduct during his/her stay at the University from 23 August, 2010 to 10 Oct, 2013  
has been Very Good

S. H. Q.  
**Head Master**  
Govt High School  
Haleem zai Charsadda

[Signature]  
**Director**  
Distance Education

Landi Akhun Ahmad, Adjacent Attock Petroleum, Ring Road, (Kohat Road-Hayatatabad Link),  
Peshawar-Pakistan Tel: +92-91-5230931-32-33 Fax: +92-91-5230930

# SARHAD UNIVERSITY

OF SCIENCE & INFORMATION TECHNOLOGY PESHAWAR

DMC.No. SU/ 18950

## Detailed Marks Certificate

Spring 2013

*YUE*



Student's Name	Allah Nawaz	Roll No.	10-FA-34358
Father's Name	Jan Muhammad	Registration No.	SUIT-10-01-59163
Programme	Master in Health & Physical Education - M.Sc. (HPE) - 2 Year	Term No.	4

Courses	Max Marks	Marks Obtained		Remarks
		In Fig.	In Words	
Philosophical Basis of Physical Education	100	062	Sixty Two	Pass
Rules & Techniques of Games & Sports	100	055	Fifty Five	Pass
Advance Health Education	100	061	Sixty One	Pass
Science of Track & Field	100	055	Fifty Five	Pass
Physical Education for Social Needs	100	045	Fourty Five	Pass
Nutrition in Sports	100	044	Fourty Four	Pass
Tech. & Teach. of Games (Practical)	50	028	Twenty Eight	Pass
Teaching Practice and Project	100	075	Seventy Five	Pass
Bio Mechanics	100	052	Fifty Two	Pass
Tech. & Teach. of Gymnastic (Practical)	50	032	Thirty Two	Pass
Tech. & Teach. of Track & Field (Practical)	50	030	Thirty Only	Pass
Sports Medicine	100	052	Fifty Two	Pass
Exercise Physiology	100	053	Fifty Three	Pass
Test Measurement & Evaluation in Physical Edu	100	053	Fifty Three	Pass
Research Method in Physical Education	100	050	Fifty Only	Pass
Psychology of Sports	100	051	Fifty One	Pass
Quantitative Research Methods	100	059	Filty Nine	Pass
Qualitative Research Methods	100	062	Sixty Two	Pass
Science of Sports Training	100	054	Fifty Four	Pass
Administration & Management in Physical Edu	100	054	Fifty Four	Pass
<b>Total</b>	<b>1850</b>	<b>1027</b>	<b>One Thousand Twenty-Seven</b>	<b>Pass</b>

*Attended paper*

General Remarks The Examination was passed in parts in 2nd division

Exam held 19-June to 08 July, 2013

Result declared 10-October, 2013

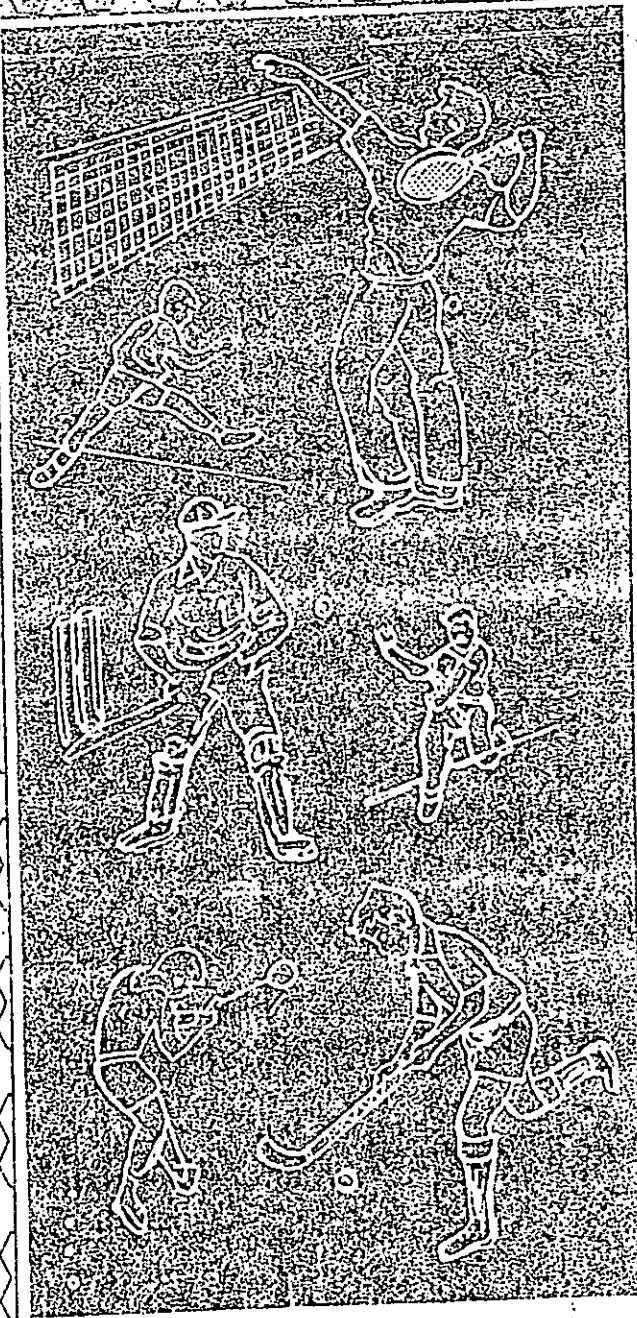
Date of issue December 05, 2013

\_\_\_\_\_  
Dean

*San*  
\_\_\_\_\_  
Controller of Examinations

(Errors and omissions are subject to subsequent rectification)

*Head Master*  
**Head Master**  
Govt High School  
Haleem zai Charsadda



S.No: 0240

Roll No: 264

GOVT COLLEGE OF PHYSICAL EDUCATION



N.W.F.P. DERA (KOHAT)  
Junior Diploma in Physical Education  
Session 1997-1998

35-A

Certified That Mr. Faris Khan  
S/O Mohd. Aman Khan District Dera  
and a student of this College has been declared successful  
in the Junior Diploma Examination held in September 1997 as a  
regular candidate according to the gazette notification by the  
Registrar, Departmental Examinations, Education Deptt. N.W.F.P. Peshawar.  
He/She Obtained 70 marks out of 100 and placed  
in I<sup>st</sup> Division.

The result was declared on 15-10-1997

*Handwritten signature*

QAIYU LIAH KIAN WAZIR  
PRINCIPAL  
Govt. College of Physical Education,  
N.W.F.P. Dera (Kohat)

# University of Peshawar

(Pakistan)

358

Session 1996  
Son of Malik Zahir Khan

and a student

of Govt. College Thana having passed the prescribed examination held in August 1996, is this day admitted by the University of Peshawar to the Degree of

## Bachelor of Arts

in the Second Division

The Examination was taken as a whole in parts

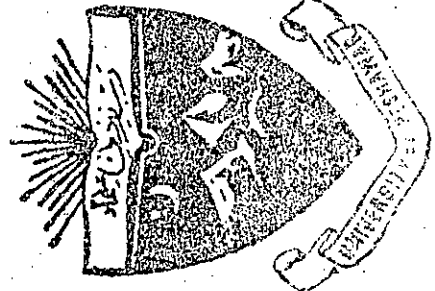
Serial No. 048751

Registration No. 93-T-3061

Roll No. 30603

Result declared on February 15, 1997

*[Handwritten Signature]*



*[Handwritten Signature]*  
Registrar

Countersigned

*[Handwritten Signature]*  
Vice-Chancellor

*[Handwritten Signature]*

Hamayun SEI

IPS-16  
GHS Maskini Dir (L)

M.Ed.

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



Serial No. 44064

PROVISIONAL RESULT CARD

Name HADI KHAN  
Father's Name MALAK ZAMIN KHAN  
Address VILL TINDODAS P/O SHAWA

Roll No. 608107612  
Registration No. CONDRI282  
Final Semester SPR- 2009

Tehsil ADENZAI  
District DIR (LOWER)

has successfully completed MASTER OF EDUCATION ( M. ED )  
TEACHER EDUCATION

35-C

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 08	0837	EDUCATIONAL RESEARCH	100	65
SPR- 08	0831	FOUNDATION OF EDUCATION	100	58
SPR- 08	0840	EDUCATIONAL PSYCHOLOGY	100	51
SPR- 08	0838	CURRICULUM DEVELOPMENT & INSTRUCTION	100	58
SPR- 07	6505	ISLAMIC SYSTEM OF EDUCATION	100	68
SPR- 07	6507	EDUCATIONAL MEASUREMENT & EVALUATION	100	66
SPR- 07	0827	TEACHER EDUCATION IN PAKISTAN	100	45
SPR- 07	0828	HIGHER EDUCATION	100	56
SPR- 07	6543	TEXTBOOK DEVELOPMENT (COMPULSORY)	100	61
SPR- 07	0826	ELEMENTARY EDUCATION	100	52
SPR- 07	0827	SECONDARY EDUCATION	100	47

Attended  
me for

CREDITS: 6

Total Marks / Obtained 1100 / 627

Result Declared on MARCH 18, 2010

Percentage / Grade 57 C

Date of issue MARCH 27, 2010

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

Controller of Examinations

Serial No. 0081717

B.Ed

# ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

Roll No.

K6170366

## DETAILED MARKS SHEET

Registration No.

00-NDR-1282

35-D

It is to certify that Mr./Ms.

HADI KHAN

son/daughter of MALAK ZAMIN KHAN has completed

all the requirements for **BACHELOR OF EDUCATION** degree

Programme with the following courses in AUTUMN, 2001 Semester :-

### Compulsory Courses

### Marks obtained

512	Perspectives of Education	58 /100
513	School Organization & Management	53 /100
514	Evaluation, Guidance & Research	50 /100
518	Educational Psychology & Curriculum	47 /100
651	English	44 /100
652	Islam, Pakistan, & Modern World	49 /100
655	Practical Component	72 /100

### Elective Courses

0657	TEACHING GENERAL SCIENCE	48 /100
0517	TEACHING OF PAK. STUDIES	49 /100
		470 /900

He/She has obtained 52 % marks and has been placed in grade C.

Result Declared On

Date: 12-08-2002

*Fajril*  
**Controller of Examinations**

Note: The Detailed Marks Sheet is issued, errors and omissions excepted, as a notice only. An entry appearing in it does not in itself confer any right or privilege independently to the grant of a proper certificate which will be issued under the Regulations, in due course.

Date of Issue. NOV 14 2003



BSc



SCA

# University of Peshawar

(Pakistan)

Session ANNUAL 1993

and a student

SAJID KHAN

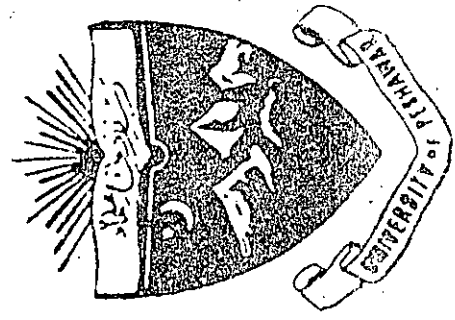
SON OF

AMIR KHAN

having passed the prescribed examination of Govt. College Thana held in August 1993, is this day admitted by the University of Peshawar to the Degree of Bachelor of Science

in the SECOND division.

The Examination was taken as a whole ~~in parts~~



Serial No 014226

Registered No. 90-T-2773

Roll No. 21852

Result declared on JANUARY 13, 1994

*[Signature]*  
Registrar

Countersigned

*[Signature]*  
Vice-Chancellor

Roll No. E-6875328

Allama Iqbal Open University



علامہ اقبال اوپن یونیورسٹی

363

QAYUM KHAN Regn. No. 96-NDR-0019 جبریل خان قیوم خان

son/daughter of AMIR AKBAR امیر اکبر بن/بنت

having completed the prescribed requirements کو 19 بیس مطلوبہ شرائط مکمل کرنے پر

in SPRING 1997 is awarded the degree of

Bachelor of Education

بی۔ ایڈ

He/She secured 59 % marks and was placed in B grade. کن ڈگری عطا کی گئی اس نے 59 فیصد نمبر لے کر سی گریڈ حاصل کیا۔

Signature of Vice Chancellor

Vice Chancellor دانش پائزر

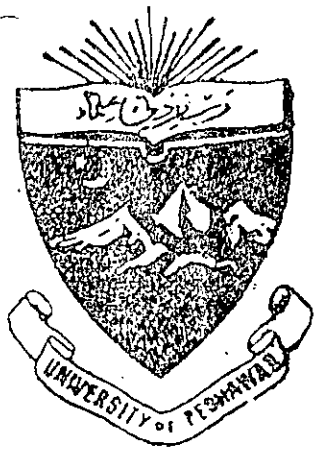
Salamabad Dated: 30TH APR. 98

Signature of Controller of Examinations

Signature of Controller of Examinations کنٹرولر امتحانات

30 APRIL 98 تاریخ

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



UNIVERSITY OF PESHAWAR  
(Pakistan)

*Yol*  
M.Sc  
Mathematics

*Detailed Marks Certificate*  
Master of Science ( FINAL ) in  
Mathematics, Annual Examination 2002

Private Candidate from Thana

Name: Qayum Khan

Gender: Male Roll No. 24952

Father's Name: Amir Akbar

Registration No. 90-T-2373

Papers	Marks Obtained		
	Maximum Marks	in Figures	in Words
Algebra (VI)	.....	.....	.....
Electromagnetic Theory (VII)	.....	.....	.....
Functional Analysis (VIII)	.....	.....	.....
Mathematical Statistics (IX)	100	64	Sixty Four
Differential Geometry (X)	100	78	Seventy Eight
Numerical Analysis (XI)	100	75	Seventy Five
Number Theory (XII)	.....	.....	.....
Measure Theory and Integration (XIII)	100	47	Forty Seven
Dynamics (XIV)	100	49	Forty Nine
Programming Languages (XV)	.....	.....	.....
Viva Voce	100	40	Forty Only
M.Sc. Previous Marks	500	507	Three Hundred and Seven
<b>Total:</b>	<b>1100</b>	<b>660</b>	<b>Six Hundred and Sixty Only</b>

Errors and omissions are subject to subsequent rectification.

Examination passed in Parts in First division.  
No. 017961

*K. J. P.*  
Controller of Examinations  
University of Peshawar

*Attested*  
*[Signature]*

DMC ISSUED ON: 03/05/03 at 08:21:18  
All Rights Reserved. No part of this may be reproduced without the permission of the University of Peshawar.

Roll No. E-6875328

Serial No. 36158

ALLAMA IQBAL OPEN UNIVERSITY  
ISLAMABAD

B.Ed.



36-9

**PROVISIONAL CERTIFICATE**

This is to certify that Mr./Ms. RAYUM KHAN  
Son/Daughter of AMIR AKBAR  
Registration No. 96-NDR-0019 has passed,

**BACHELOR OF EDUCATION**

examination with the subjects detailed below in Spring/Autumn 1997  
Semester.

<u>S. No.</u>	<u>Code/Subjects</u>	<u>Marks obtained</u>
<b><u>Compulsory:</u></b>		
1.	513-School Organization and Management	<u>56</u> / 100
2.	514-Evaluation, Guidance and Research	<u>48</u> / 100
3.	518-Educational Psychology and Curriculum	<u>51</u> / 100
4.	651-English	<u>52</u> / 100
5.	512-Perspectives of Education	<u>47</u> / 100
6.	652-Islam, Pakistan and Modern World	<u>62</u> / 100
7.	655-Practical Component	<u>77</u> / 100
<b><u>Electives:</u></b>		
8.	656-TEACHING OF PHYSICS	<u>64</u> / 100
9.	661-TEACHING OF MATH	<u>74</u> / 100
Total:		<u>531</u> / 900

He/She has secured 59 percent marks and has been placed in B grade.

Islamabad  
Dated: 30TH APR, 1998.

Prepared by: [Signature]  
Checked by: [Signature]

[Signature]  
Controller of Examinations



University of Peshawar (Pakistan)

PASSED/RE-APPEAR

BSc

Detailed Marks Certificate No 021852

B. Sc. PART-II EXAMINATION, 1993 ANNUAL

Mr./Ms

Qayyum Khan

Roll Number 21852

The Candidate Secured the following marks and is placed in Second Division.

SUBJECTS	Marks allotted	Marks obtained	Marks in Words
1. Physics	75	34	Thirty four
2. Maths A	75	32	Thirty two
3. Maths B	75	36	Thirty six
A. Pakistan Studies	40	21	Twenty one
B.Sc. Part-I marks	285	124	One hundred & twenty four
Total	550	247	Two hundred & forty seven

Errors and omissions are subject to subsequent rectification

The Examination was taken as a ~~WHOLE~~ / IN PARTS.

Result Declaration date.....

Date 13 JAN 1994

Controller of Examinations, University of Peshawar.

Attested copy

BSc

# Allama Iqbal Open University Islamabad



36-P

Serial No. 23830

Certified that Mr. / Ms. QAYUM KHAN

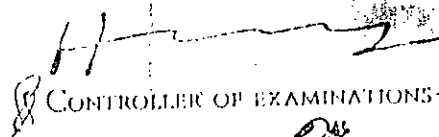
Son / Daughter of AMIR AKBAR

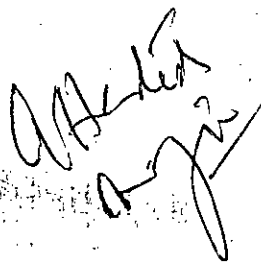
Registration No: 96-NDR-0019 Roll No: P-646038

having successfully completed the prescribed requirements  
in semester AUTUMN 2005 is awarded the degree of

*Master of Education (M. Ed.)*

He/She has secured 58 % marks and has been placed in C grade.

  
CONTROLLER OF EXAMINATIONS



  
VICE-CHANCELLOR

Result declared on: August 25, 2006

Date of Issue: May 30, 2011

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Serial No. <sup>GU</sup> 1 00070

# GOMAL UNIVERSITY

## DERA ISMAIL KHAN

(N.W.F.P) PAKISTAN



*Handwritten signature*

(Session 1992-93)

RAHIM BAKHT. SON OF KARIM BAKHT.

and a student of the Department of Health and Physical Education, Gomal University having passed the prescribed examination in APRIL/MAY, 19 95, is this day admitted by the Gomal University to the

## Junior Diploma in Physical Education

in the SECOND Division, is qualified to supervise Physical Education in Districts and to teach this subject in Schools.

The Examination was taken as a whole/in parts.

Date of Birth: 15-5-1973 (FIFTEENTH MAY A.M. SEVENTY THREE.)

Registered No. 452-PEDU-92

Roll No. 354

JULY 15, 19 95

PAKISTAN SPORTS COMPLEX, ISLAMABAD.  
BPS-15 Circle  
P.O. Kashmir, Dera Ismail Khan

*Attended page*

*Signature*  
Controller of Examinations

# GOMAL UNIVERSITY

## DERA ISMAIL KHAN

(N.W.F.P) PAKISTAN



37-B

(Session 1996-97)

RAHIM BAKHT.

SON of KARIM BAKHT.

NATIONAL COLLEGE OF PHYSICAL EDUCATION, MARDAN (PVT)  
and a student of the Department of Health and Physical Education,  
Gomal University having passed the prescribed examination in  
MAY, 2000 19, is this day admitted by the Gomal  
University to the

### Senior Diploma in Physical Education

in the SECOND Division, is qualified to supervise Physical Education  
and to teach this subject in Colleges and Schools.

The Examination was taken ~~as a whole~~ /in parts.

Date of Birth 15-5-1973 (FIFTEENTH MAY N.H. SEVENTY THREE)

*Handwritten signature*

Registered No. 71-NCFEM-96

Roll No. 4362

*Handwritten signature*

JANUARY 9, 19 2001

RAHIM BAKHT  
BPS-16 GND  
D/Kashmir Dir(L)

Countersigned

*Handwritten signature*

*Handwritten signature*

Controller of Examinations

Vice-Chancellor





# UNIVERSITY OF DISRAULI

376

(Pakistan)

Session \_\_\_\_\_ of \_\_\_\_\_

and a student

having passed the prescribed examination

of \_\_\_\_\_ admitted by the University of Disrauli

held in \_\_\_\_\_ 19\_\_\_\_, is this day admitted to the Degree of

## Bachelor of Arts

in the \_\_\_\_\_ division.

The Examination was taken as a whole / in parts.

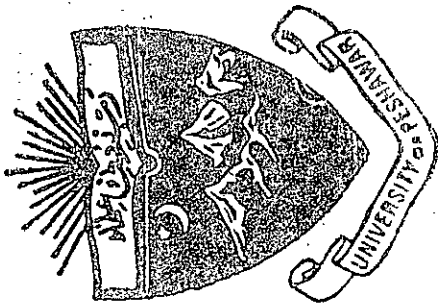
UNIVERSITY OF DISRAULI  
BPS-16005  
Dikshini D/O

*[Signature]*

*[Signature]*  
Registrar

CONFIRMED

*[Signature]*  
Vice-Chancellor



*[Signature]*

Serial No: 032383

Registration No: 03-7-3005

Roll No. 54130

Result declared on April 3, 1957

37-D

# Allama Iqbal Open University Islamabad



Serial No. 100839

Certified that Mr. / Ms. RAHIM BAKHT

Son / Daughter of KARIM BAKHT

Registration No: 03-NDR-0485 Roll No: O-610781

having completed the prescribed requirements in semester

AUTUMN 2004

is awarded the degree of:

## Bachelor of Education (B.Ed)

He / She has secured 61 <sup>Altoos</sup> % marks and has been placed in B grade.

Rabir Ahmad  
BPS-16 GHS,  
D/Kashmir

*[Signature]*

CONTROLLER OF EXAMINATIONS

Result declared on: July 26, 2005



*[Signature]*  
VICE-CHANCELLOR

ISLAMABAD. DATED: September 15, 2007

*[Signature]*

THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT, ISSUED SEPARATELY

*[Handwritten signature]*

*Allama Iqbal Open University*  
*Dabulband* 37/8



Serial No. 25566

Certified that Mr. / Ms. RAHIM BAKHT ✓

Son / Daughter of KARIM BAKHT ✓

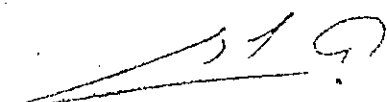
Registration No: 03-NDR-0485 Roll No: T-650808


having successfully completed the prescribed requirements  
in semester SPRING 2007 is awarded the degree of

*Master of Education (M.Ed.)*

He/She has secured 57 % marks and has been placed in C grade.

**Attested**

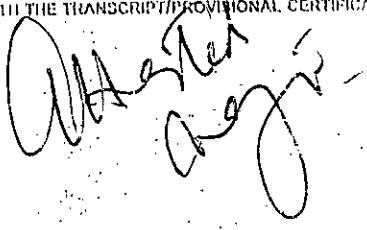
  
CONTROLLER OF EXAMINATIONS

  
**HEAD MASTER**  
G.M.S, Kumbhar (As) VICE-CHANCELLOR  
Distt. Dir (Lower)

Result declared on: March 10, 2008

Date of Issue: February 10, 2012

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVINCIAL CERTIFICATE ISSUED SEPARATELY



# GOMAL UNIVERSITY

## DERA ISMAIL KHAN

(N.W.F.P) PAKISTAN



38-A

(Session 2003-2004)

NOOR ALI KHAN. SON of MUHAMMAD SAID.  
NATIONAL COLLEGE OF PHYSICAL EDUCATION, MARDAN (FVT)  
and a student of the Department of Health and Physical Education,  
Gomal University having passed the prescribed examination in  
APRIL, 2005 19, is this day admitted by the Gomal  
University to the

### Senior Diploma in Physical Education

in the SECOND Division, is qualified to supervise Physical Education  
and to teach this subject in Colleges and Schools.

The Examination was taken as a whole/in parts.

Date of Birth 14-6-1974 (FOURTEENTH JUNE N.H. & SEVENTY FOUR)

*Attested*  
*AP*  
Rajinder Singh  
B.O. No. 100  
D/Kashmir (100)

Registered No. 401-NCPEN-2003

Roll No. 425

RESULT DECL. ON:  
JUNE 13, 19 2005

Countersigned

Controller of Examinations

*Ajmal Khan*

Vice-Chancellor

*Attested*  
*Rajinder Singh*

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

# University of Peshawar

(Pakistan)

Session ANNUAL 2001

*Handwritten mark*

MOOR ALI KHAN SON of MUHAMMAD SAID and a student  
of DIR DISTRICT having passed the prescribed examination  
held in SEPTEMBER 2001 is this day admitted by the University of Peshawar  
to the Degree of  
**Master of Arts**

*Handwritten signature*

in the SECOND Division

The Subject of Examination being PASHTO

The Examination was taken as ~~xxx~~ whole / in parts

Serial No. 032482

Registration No. 93-T-2976

Roll No. 2540

Result Declared on 11TH APRIL 2002



REGISTRATION  
CHARGE  
BPS-1003  
PESHAWAR  
UNIVERSITY

Final 1/2001  
Registrar

Attested

Countersigned

*Handwritten signature*  
Vice-Chancellor

382



# University of Peshawar (Pakistan)

*Handwritten signature*

Session ANNUAL 1995

NOOR ALI KHAN SON of MUHAMMAD SAID and a student  
of GOVERNMENT DEGREE COLLEGE THANA having passed the prescribed examination  
held in AUGUST, 1995, is this day admitted by the University of Peshawar

## to the Degree of Bachelor of Arts

in the SECOND Division.

The Examination was taken as a whole / in parts

*Attested*  
*Handwritten signature*  
HOD, COLLEGE / SPEY  
PESHAWAR

Serial No. 037480

Registration No. 95-T-2976

Roll No. 36207

Result declared on FEBRUARY 08, 1996



*Handwritten signature*  
Registrar

Countersigned

*Handwritten signature*  
Vice-Chancellor

38-9

# Allama Iqbal Open University Islamabad



Serial No. 100844

Certified that Mr. / Ms. NOOR ALI KHAN


Son / Daughter of MUHAMMAD SAEED

Registration No: 03-NDR-0495 Roll No: 0-621737

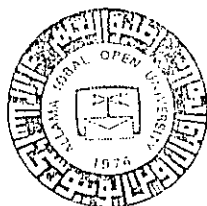
having completed the prescribed requirements in semester  
AUTUMN 2004 is awarded the degree of:

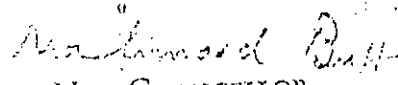
## Bachelor of Education (B.Ed)

He / She has secured 60 % marks and has been placed in B grade.


  
CONTROLLER OF EXAMINATIONS

Result declared on: July 26, 2005




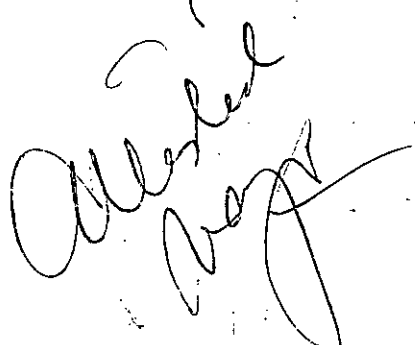
  
VICE-CHANCELLOR

ISLAMABAD. DATED: September 15, 2007

  
Attested

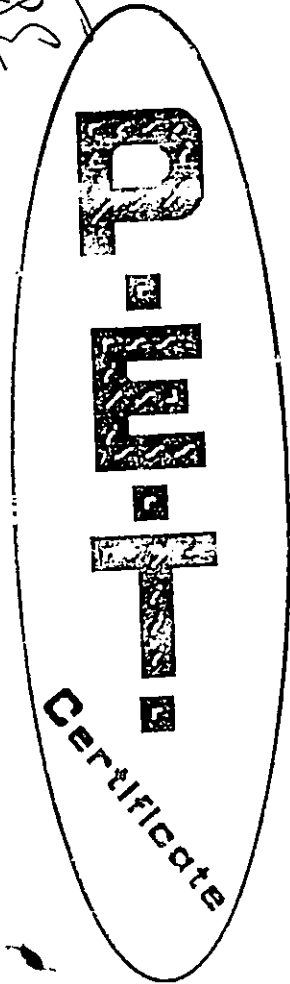
THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT, ISSUED SEPARATELY

  
BPS-10  
E/Kashmir D: (L)



# SCHOOLS & LITERACY DEPARTMENT, NWFP, PESHAWAR

38



Serial No. 160 Session 1958

Roll No. 263 Marks Obtained 812 / 1000

Division 3rd

Certified that Mr./Mrs./Miss Mrs. Ali Khan

Son/Daughter of Muhammad Said is a student of

Gert; College of Phy; Education Dera (Yohat)

having passed the P.E.T. Examination held in 12-1958 is

qualified himself/herself.

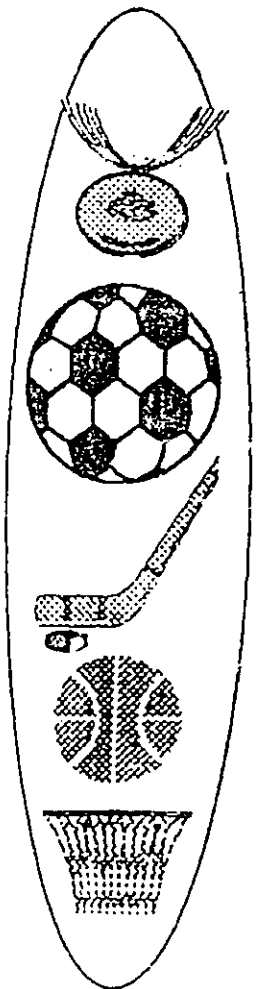
Prepared by [Signature]

Checked by [Signature]

Date of declaration Result 12-58

Date of Issue 12-58

[Signature]  
Deputy Director (Examination)  
Schools & Literacy Department,  
N.W.F.P., Peshawar.



Approved

[Signature]  
[Signature]



GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.



NOTIFICATION

Peshawar, dated the November 13, 2012.

No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of all Notifications issued in this behalf, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby lays down the method of recruitment, qualification and other conditions specified in the Appendix to this Notification which shall be applicable to all the posts specified in Column No. 2 of the said Appendix and the schedule therewith.

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary to Govt. of Khyber-Pakhtunkhwa, Establishment Department.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Law Department.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General, Khyber Pakhtunkhwa Peshawar.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. The Director Education (FATA), Peshawar.
8. Copy to Margari Ustazan KPK

SECRETARY TO GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

39  
Annexure  
B

KPK

Attested  
Majid

40

- 8. The Director Curriculum & Teachers Education Abbottabad.
- 9. The Director (PITE) Khyber Pakhtunkhwa Peshawar.
- 10. The Director ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 11. The Deputy Director Database(EMIS) E&SE Department.
- 12. All District Coordination Officers in Khyber Pakhtunkhwa.
- 13. All Executive District Officers Elementary & Secondary Education in Khyber Pakhtunkhwa.
- 14. All District Accounts Officers in Khyber Pakhtunkhwa /Agency Accounts Officers FATA.
- 15. All Agency Education Officers FATA.
- 16. P.S to Governor, Khyber Pakhtunkhwa.
- 17. P.S to Chief Minister, Khyber Pakhtunkhwa.
- 18. P.S to Chief Secretary, Khyber Pakhtunkhwa.
- 19. PS to Minister E&SE Khyber Pakhtunkhwa Peshawar.
- 20. PS to Secretary E&SE Department.
- 21. Master File.

*[Large handwritten signature]*

*[Handwritten signature]*  
 Section Officer (Primary)

*KPK*

*JJ*

*Asst. Secy*  
*Wazir*

APPENDIX

3

41

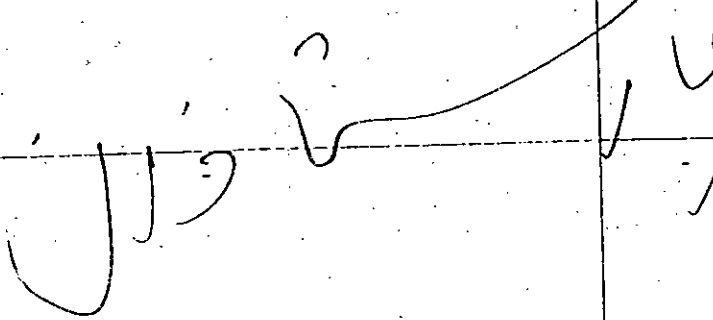
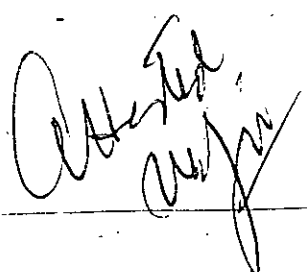
Nomenclature of the post.	Minimum qualification and experience for initial appointment or by transfer.	Age limit.	Method of recruitment.
<p align="center">2.</p> <p>Secondary School Teacher (BPS-16).</p> <p><i>Attached page</i></p>	<p align="center">3.</p> <p>(i) Second class Bachelor's Degree with two subjects as Chemistry, Botany, Zoology, Physics, Mathematics, Statistics Humanities and other equivalent groups from a recognized University; or</p> <p>(ii) M.A in Education or Bachelor's Degree in Education, from a recognized University.</p> <p><i>KPK</i></p> <p><i>الزامی</i></p> <p><i>ACTA</i></p>	<p align="center">4.</p> <p>18 to 35 years.</p>	<p align="center">5.</p> <p>(a) Fifty percent by promotion on the basis of seniority-cum-fitness, in the following manner:</p> <p>(i) forty per cent from amongst the Certified Teachers (General), Certified Teachers (Agriculture), Certified Teachers (Industrial Arts) and Certified Teachers (Home Economics) with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(ii) four per cent from amongst the Drawing Masters with at least five years service as such and having qualification mentioned in column No.3;</p> <p>(iii) four per cent from amongst the Physical Education Teachers with at least five years service as such and having qualification mentioned in column No. 3;</p> <p><i>Attached page</i></p>

*Attached page*

			<p>(iv) one per cent from amongst the Instructional Material Specialists, with atleast five years service as such and having qualification mentioned in column No. 3; and</p> <p>(v) one per cent from amongst the Arabic Teachers with at least five years service as such and having qualification mentioned in Column No.3; and</p> <p>(b) fifty per cent by initial recruitment.</p>
2.	Senior Arabic Teacher (SAT) (BPS-16)	<p>KPK</p> <p>U.S.</p> <p>ACTA</p>	<p>By promotion, on the basis of seniority-cum-fitness, from amongst Arabic Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Arabic Teacher.</p>
3.	Senior Theology Teacher (STT) (B-16).		<p>By promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Theology Teacher.</p>
4.	Senior Certified Teacher (SCT)(General) (BPS-16).		<p>By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (General), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (General).</p>

UP

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5.	Senior Certified Teacher (Industrial Arts) (BPS-16).		By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (Industrial Arts), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Industrial Arts).
6.	Senior Certified Teacher (Agriculture) (BPS-16).		By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (Agriculture), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Agriculture).
7.	Senior Drawing Master (BPS-16).		By promotion on the basis of seniority-cum-fitness from amongst Drawing Masters, with at least five years service as such and having qualification as prescribed for initial recruitment of Drawing Master.
8.	Senior Certified Teacher (SCT) (Home Economics) (BPS-16).		By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (Home Economics), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Home Economics).
9.	Senior Physical Education Teacher (BPS-16).		By promotion, on the basis of seniority-cum-fitness, from amongst Physical Education Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Physical Education Teacher.

43

14

44

Arabic Teacher (AT) (BPS-15).	(i) Second Class Secondary School Certificate, from a recognized Board with Shahdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Arabic from a recognized University.	20 to 35 years.	By initial recruitment
Theology Teacher (TT) (BPS-15).	(i) Second Class Secondary School Certificate, from a recognized Board with Shahdatul Alamia from a recognized Tanzimatul Wafaqul Madaris or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Islamiyat from a recognized University.	20 to 35 years.	(a) Seventy-five per cent by initial recruitment; and (b) twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Qaris, with at least five years service and having qualification prescribed for initial recruitment of Theology Teacher. <u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.
Senior Qari (BPS-15).	(ii) Second Class Master's Degree in Islamiyat from a recognized University.		By promotion, on the basis of seniority-cum-fitness, from amongst Qaris, with at least five years service as such and having qualification prescribed for initial recruitment.
Certified Teacher (General) (BPS-15).	Bachelor's Degree or equivalent qualification from a recognized University with Certified Teacher	18 to 35 years.	(a) Forty per cent by initial recruitment; and

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Handwritten initials

45

Certificate or two years Associate Degree in Education from a recognized University or eighteen months Diploma in Education.

(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General):

Provided that if no suitable candidate is available amongst the Primary School Head Teachers for transfer, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General).

Note: In case of non availability of suitable person for promotion, then by initial recruitment.

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14. Certified Teacher (Industrial Arts) (BPS-15).

(i) Bachelor's Degree from a recognized University with two years training in the relevant technical subjects from any Government Industrial or Govt. Technical Vocational Institute or Center; or

18 to 35 years.

(a) Forty per cent by initial recruitment; and

(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher

(b) Bachelor's Degree from a recognized

*[Handwritten signature at the bottom center]*

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46

University with nine months training from any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Industrial Arts).

(Industrial Arts):

Provided that if no suitable candidate is available amongst the Primary School Head Teachers for Promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Industrial Arts).

Note: In case of non availability of suitable person for promotion, then by initial recruitment.

Certified Teacher (Agriculture) (BPS-15)

- (i) Bachelor's Degree from a recognized University with one year training in Agriculture from any Government institute or center with nine months training from Government Agro Technical Teacher Training Center of the level of Certified Teacher Agro Technical (Agriculture); or
- (ii) Bachelor's Degree with Agriculture as one of the subject, from a recognized University; or
- (iii) Bachelor's Degree, from a recognized

18 to 35 years.

- (a) Forty per cent by Initial recruitment; and
- (b) sixty per cent by promotion, on the basis of seniority-cum-fitness from amongst the Primary School Head Teachers, with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture):

Provided that if no suitable candidate is available amongst the

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47

	<p>any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Agriculture):</p>		<p>promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture).</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p>
<p>6. Certified Teacher (Home Economics) (BPS-15).</p> <p>KPK</p>	<p>(i) Bachelor's Degree with Home Economics, as one of the subject, from a recognized University with in service training from Government Agrb Technical Teacher Training Center or</p> <p>(ii) Certified Teacher Certificate with Home Economics as one of the subjects, from any Government Training school or college with Bachelor's Degree; or</p> <p>(iii) Bachelor's Degree from a recognized University with nine months training from Government Agro Technical Teacher Training Center of the level of the Certified Teacher Agro Technical (Home Economics); or</p> <p>(iv) Bachelor's Degree, from a recognized</p>	<p>18 to 35 years.</p>	<p>(a) Forty per cent by Initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service as such and having qualification prescribed for initial recruitment of Certified Teacher (Home Economics):</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of</p>

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*Handwritten initials*

17. Drawing Master (BPS-15).

University with one year vocational training from any Government training center or institute with nine months training from Government Agro Technical Teacher Training center of the level of certified Teacher Agro Technical (Home Economics).

Bachelor's Degree from a recognized University with one year Drawing Master (DM) course Certificate.

18 to 35 years.

Certified Teacher (Home Economics).

Note: In case of non-availability of suitable person for promotion, then by initial recruitment.

- (a) Eighty per cent by initial recruitment; and
- (b) twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Drawing Master.

Provided that if no suitable candidate is available for promotion then on the basis of seniority-cum-fitness, from Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Drawing Master.

Note: In case of non-availability of suitable candidate for promotion, then by initial recruitment.

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3.	Physical Education Teacher (BPS-15).	Bachelor's Degree from a recognized University with one year junior Diploma in Physical Education course or Army equivalency or other equivalent qualification.	18 to 35 years.	<p>(a) Eighty per cent by initial recruitment; and</p> <p>(b) twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher.</p>
<p>Provided that if no suitable candidate is available for promotion then on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher.</p>				
<p><u>Note:</u> In case of non-availability of suitable candidate for promotion, then by initial recruitment.</p>				
19.	Primary School Head Teacher (PSHT) (BPS-15).			By promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least ten years service and having qualification prescribed for initial recruitment of Primary School Teacher.
20.	Senior Primary School Teacher (BPS-14).			By promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teachers

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				with at least five years service as such and having qualification prescribed for initial recruitment of Primary School Teacher.
21.	Primary School Teacher (BPS-12).	(i) Intermediate or equivalent qualification, from a recognized Board with Primary School Teacher Certificate/ Diploma in Education from a recognized Institute; or  (ii) Secondary School Certificate, from a recognized Board in second Division with two years Associate Degree in Education from a recognized University.	18 to 35 years.	By initial recruitment on merit at Union Council level: provided that if no suitable candidate is within the Union Council is available, then from the adjacent Union Councils on merit.
22.	Qari (BPS-12).	Intermediate with Hafz-e-Quran and Qirat Sanad from a recognized Institution.	18 to 35 years.	By initial recruitment.

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SCHEDULE

Selection criterion and other conditions for direct recruitment against the below mentioned posts shall be as under:-

<u>Arabic Teacher</u>	Total Marks: 100
<u>Educational Qualification</u>	Marks obtained X 20 / total marks =
SSC	Marks obtained X 20 / total marks =
HSSC	Marks obtained X 20 / total marks =
BA/BSc	Marks obtained X 20 / total marks =
M.A Arabic / Shahdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimiatul Wafaqul Madaris	Marks obtained X 15 / total marks =
Other MA/MSc/M.Ed / MA Edu	Marks = 05
MPhil/PhD	

Theology Teacher

<u>Theology Teacher</u>	Total Marks 100
<u>Category of Qualification</u>	Marks obtained X 20 / total marks =
SSC	Marks obtained X 20 / total marks =
HSSC	Marks obtained X 20 / total marks =
BA/BSc	Marks obtained X 20 / total marks =
MA MSc/M Ed / MA Edu	Marks obtained X 15 / total marks =
M.A Islamia / Shahdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimiatul Wafaqul Madaris	Marks = 05
MPhil/PhD	

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Qari/Qaria

Category of Qualification	Total Marks 100
SSC	Marks obtained X 20 / total marks = ___
Qirt Sanad from a recognized Institution.	Marks obtained X 20 / total marks = ___
HSSC	Marks obtained X 20 / total marks = ___
BA/BSc	Marks obtained X 20 / total marks = ___
MA/MSc/ M.Ed/ MA Edu	Marks obtained X 15 / total marks = ___
MPhil/PhD	Marks = 05

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**Certified Teacher**  
(General, Industrial Arts, Agriculture, Home Economics)

Category of Qualification	Total Marks 100 For Humanities group at Intermediate/Graduation Level	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = ___	5 Extra marks for F.Sc; 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection
HSSC	Marks obtained X 20 / total marks = ___	
BA/BSc	Marks obtained X 20 / total marks = ___	
CT Certificate, Diploma in Education	Marks obtained X 20 / total marks = ___	
M.A/M.Sc/M.Ed/M.A Edu	Marks obtained X 15 / total marks = ___	
MPhil/PhD	Marks = 05	

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Drawing Master

Category of Qualification	Total Marks 100	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = ____	5 Extra marks for F.Sc, 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection
HSSC	Marks obtained X 20 / total marks = ____	
B.A/BSc	Marks obtained X 20 / total marks = ____	
DM Certificate	Marks obtained X 20 / total marks = ____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = ____	
MPhil/PhD	Marks = 05	

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Physical Education Teacher

Category of Qualification	Total Marks 100	For Candidate of Science group
SSC	Mark obtained X 20 / total marks = ____	5 Extra marks for F.Sc, 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection
HSSC	Marks obtained X 20 / total marks = ____	
B.A/BSc	Marks obtained X 20 / total marks = ____	
JDPE or Equivalent Certificate	Marks obtained X 20 / total marks = ____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = ____	
MPhil/PhD	Marks = 05	

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Primary School Teacher

Category of Qualification	Total Marks 100 For Humanities group at Intermediate Level	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = ____	5 Extra marks for FSc, 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection
HSSC	Marks obtained X 10 / total marks = ____	
B.A/BSc	Marks obtained X 25 / total marks = ____	
PST Certificate/ Diploma in Education / ADE	Marks obtained X 20 / total marks = ____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 20 / total marks = ____	
MPhil/PhD	Marks = 05	

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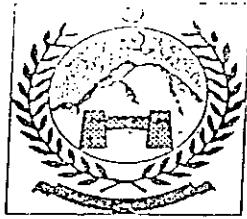
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Other conditions:-

1. The concerned Appointing Authority will scrutinize and verify the documents and make the appointment as per prescribed rule and the will get the documents verified after the issuance of appointment orders within shortest possible time, not exceeding ninety (90) days
2. The merit list prepared by the concerned appointing authority shall be displayed for ten days to receive the objections/appeals, if any, and shall issue the final merit list after making necessary corrections while addressing the observations/objections appeals, followed by requisite appointment orders.
3. In case a document(s) is/are found fake/ forged/ bogus upon scrutiny/ verification, the service of the teacher concerned shall be terminated and the amount paid to him as salary shall be recovered from him and an FIR shall be lodged against him on account of forgery fraud under the relevant law.
4. Deni Asmat from recognized Waqemat-ul-Wafaqul Madaris, Darul Uloom Saifu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time will be acceptable for the purpose of appointment against the posts of Arabic Teachers or Theology Teachers, as the case may be

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GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

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Peshawar, dated the 24<sup>th</sup> July, 2014.

**NOTIFICATION**

**No.SO(PE)4-5/SSRC/Meeting/2013/Teaching Cadre:-** In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notifications No.SO(G)S&LD/1-28/2003/Vol-II dated, 09-04-2004, Notification No.SO(G)S&L/1-69/06/Vol-1/DPE/LIB dated, 13-11-2007, and Notification No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre, dated, 13.11.2012, the following further amendments shall be made, namely:

**AMENDMENTS**

In the Appendix,-

- (i) Serial No. 1 shall be renumbered as 1B and before Serial No. 1B, as so renumbered, the following new entries shall be inserted in respective columns, namely:

1	2	3	4	5
1	Subject Specialist (BPS-17)	i. At least second class Master's Degree or four years BS Degree in the relevant subject; and  ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualification from a recognized University.	23 to 35 years	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-16), with at least five years service as such and having qualification mentioned in column No. 3.  <b>Note:</b> If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

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(1)

1A	Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	22-35 years	<p>(b) Fifty percent by initial recruitment.</p> <p>(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No. 3:</p> <p>Provided that if no suitable person is available from amongst Senior Physical Education Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Physical Education Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>Note:- If no suitable candidate is available in the relevant cadres of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment; and</p> <p>(b) fifty percent by initial recruitment"; and</p>
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*Amended*  
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against Serial No. 1 B, as so mentioned. The following shall be substituted, in respect of the post, namely:

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

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candidate is available from amongst Senior Drawing Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;

- (c) four per cent from amongst the Senior Arabic Teachers(BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, and having qualification mentioned in column No.3:

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

- (d) four per cent from amongst the Senior Theology Teachers(BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3:

*Attended*

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

- (e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No.3:

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

- (f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3:

Provided that if no suitable candidate is available from amongst

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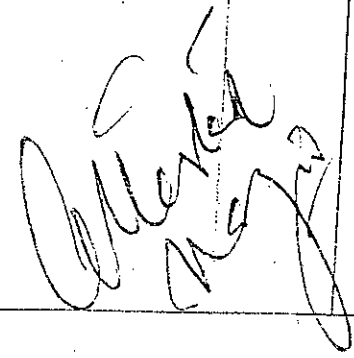
1. In the Senior Head Teachers job promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No.3:

Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as such and having qualification mentioned in column No. 3; and

(ii) twenty Five percent by initial recruitment.

**Note:**

- I. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.
- II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately."



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SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

*Endst : of even No & date:*

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officer (M&F) in Khyber Pakhtunkhwa.
14. All District Account Officer in Khyber Pakhtunkhwa.
15. All Agency Education Officer in FATA
16. All Agency Account Officer in FATA.
17. PS to Governor Khyber Pakhtunkhwa. Peshawar.
18. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
19. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
20. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
21. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.
22. Master file

  
  
(ZAMIN KHAN MOMAND)  
SECTION OFFICER (PRIMARY)

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(D)

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جناب والا! ہم ہمارے فزیکل ایجوکیشن ٹیچرز (P.E.Ts) ہمدردانہ درخواست کرتے ہیں کہ آپ صاحبان نے تمام کیڈرز کے ساتھ کو SST میں کوئڈ سے دیا ہے لیکن صرف P.E.Ts کو اپنے سابقہ کوئڈ سے محروم کر دیا گیا ہے جو B.Ed ڈگری رکھنے والے P.E.Ts کے ساتھ نا انسانی اور ظلم ہے۔ آپ صاحبان یہ جواز پیش کرتے ہیں کہ P.E.Ts کو DPE میں کوئڈ دیا گیا ہے ہم اس دلیل کو مسترد کرتے ہیں کیونکہ جناب والا (1) DPE میں ہمارا کوئڈ بہت پہلے سے چلا آ رہا تھا اور ساتھ ہی SST میں چار فیصد کوئڈ دیا گیا تھا۔ (2) PST ٹیچرز کو PET, CT وغیرہ میں بھی پروموشن دیا گیا ہے اور ساتھ ہی SST میں بھی 20 فیصد کوئڈ دیا گیا ہے حالانکہ وہ 12 BPS میں بھرتی ہوتے ہیں۔ اسی طرح قاری 12 BPS کو TT پروموشن اور ساتھ ہی 3 فیصد کوئڈ SST میں دیا گیا ہے۔ (3) SST اور ساتھ ہی ہیڈ ماسٹر میں بھی کوئڈ دیا گیا ہے صرف P.E.Ts کو سابقہ حکومت کے کوئڈ سے جو SST میں دیا گیا تھا سے محروم کیا گیا ہے۔ (4) قاری 12 BPS میں بھرتی ہوتا ہے اس کو براہ راست (16) sst میں کوئڈ دیا گیا ہے چاہے تو یہ تھا کہ اسے (15) AT اور (15) TT میں کوئڈ دیا جاتا اور PET بنیادی سکول 15 کو sst بنیادی سکول 12 میں مناسب کوئڈ دیا جاتا مگر ایسا نہیں کیا گیا جو انصاف اور منطقی کے تقاضوں کے منافی ہے لہذا آپ صاحبان سے ہمدردانہ اپیل ہے کہ sst میں P.E.Ts کا 4 فیصد کوئڈ بحال کیا جائے بلکہ احسان کر کے اس کو مزید بڑھایا جائے تو ہم مشکور رہیں گے۔

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اداری خان PET ممبر CEC فزیکل ایجوکیشن ٹیچرز ایسوسی ایشن صوبہ خیبر پختون خواہ

فیردوسی، میاں نسیا، الرتھان، اجمل خان، بہان سوز، شاہ جہان، حاجی محمد عابد، ناسر تہال

اجمل علی، اجبر خان وغیرہ نمایاں فزیکل ایجوکیشن ٹیچرز ایسوسی ایشن صوبہ خیبر پختون خواہ

تاریخ



Annex 1  
15/7/14

بخدمت جناب سیکرٹری ایجوکیشن صوبہ خیبر پختون خواہ پشاور  
عنوان: ایس ایس ٹی میں فزیکل ایجوکیشن ٹیچرز کا 4 فیصد کوٹہ بحال کیا جائے

جناب عالی:-

گزارش بحضور انور ہے کہ محکمہ تعلیم روز 13 نومبر 2012 میں فزیکل ایجوکیشن ٹیچرز کیلئے 4 فیصد کوٹہ رکھا گیا تھا جو اب موجودہ ورکنگ پیپرز میں اس کو حذف کیا گیا ہے بلکہ فزیکل ایجوکیشن ٹیچرز کا کوٹہ ایس ایس ٹی میں بالکل ختم کیا گیا ہے جس پر فزیکل ایجوکیشن ٹیچرز نے پشاور ہائیکورٹ میں ایک رٹ دائر کی تھی جس پر عدالت عالیہ نے 29 اپریل 2014 کو فزیکل ایجوکیشن ٹیچرز کے 4 فیصد کوٹہ بحال کا حکم نامہ جاری کیا اور اب 10 جولائی 2014 کو ڈائرکٹر تعلیمات صوبہ خیبر پختون خواہ نے ایک دفعہ پھر جو ورکنگ پیپرز جاری کئے ہیں ان میں ایس ایس ٹی کیلئے فزیکل ایجوکیشن ٹیچرز کا 4 فیصد کوٹہ کو عدالت عالیہ کے 29 اپریل 2014 کے فیصلے کے باوجود نظر انداز کیا گیا ہے۔ حالانکہ ہم تمام فزیکل ایجوکیشن تقریباً 20، 25 سالوں سے ایس ایس ٹی میں پروموشن کے انتظار میں بیٹھے تھے اس کے باوجود ہمیں نظر انداز کیا گیا، ہم سب فزیکل ایجوکیشن ٹیچرز ایم اے ایم ای سی بی ایڈ ایم ایڈ ہیں اور اپنے اپنے سکولوں میں ریاضی، فزکس، کمپسٹری وغیرہ پڑھاتے ہیں۔ اسلئے ہم فزیکل ایجوکیشن ٹیچرز آپ صاحبان سے گزارش کرتے ہیں کہ فزیکل ایجوکیشن ٹیچرز کا 4 فیصد کوٹہ بحال کیا جائے تاکہ ہمارے ساتھ ہونیوالی نا انصافی کا ازالہ ہو سکے۔

العارض

Diary No: 2899

آل فزیکل ایجوکیشن ٹیچرز صوبہ خیبر پختون خواہ پشاور

سینئر فزیکل ایجوکیشن ٹیچرز میاں ضیاء الرحمان ایم ایس سی (ریاضی)، ایم ایڈ

Attested  
Signature

15/4 B-II

**BEFORE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL PESHAWAR**

APPEAL NO. 1434/2013

Tariq Javed .....Appellant

**Versus**

Commissioner Peshawar.....Respondent.

Sub: **APPLICATION ON BEHALF OF RESPONDENT NO. 1 FOR SETTING ASIDE THE EX-PARTE PROCEEDINGS.**

**Respectfully Sheweth.**

A.W.P. Province  
Service Tribunal  
Diary No. 76  
dated 16-2-15

It is submitted that Hon'ble Tribunal has granted ex parte proceedings in above titled case for non submission of joint para-wise comments before the tribunal and case has been was fixed for arguments on Ex-party proceedings.

This office vide letter No. Appeal/143/KC/AR/2013/1806 asked the Deputy Commissioner Peshawar to prepare joint para-wise comments and submit to this office for counter-signature of the Commissioner (As Respondent No. 1); however, the same were not submitted by the Deputy Commissioner, Peshawar. Again vide letter No. Appeal 1439/KC/AR/11692 dated 09.10.2014, Deputy Commissioner Peshawar was reminded to attend the court on due date on behalf of this office and expedite furnishing comments as well as file application for setting aside Ex-Party proceedings, and to this effect a reminder was issued for early action, however, not yet furnished.

The case was fixed on 12.02.2014 before the Hon'ble court however, this office was informed that neither the application for setting aside the Ex-party proceedings has been filed before the court nor comments yet furnished.

It is prayed that Ex-Party proceedings in the subject tilted case may kindly be set aside. Comments in the main appeal as well as stay application will be submitted before the next date.

**ASST: TO COMMISSIONER(P/D)  
PESHAWAR DIVISION PESHAWAR  
(For respondent No. 1)**

Dated 16.02.2015