26.04.2023

Appellant present through counsel.

Fazal Shah Mohmand, learned Additional Advocate General for respondents present.

Learned Member Executive (Mr. Muhammad Akbar Khan) is on leave, therefore, case is adjourned. To come up for arguments on 27.06.2023 before D.B. Parcha Peshi given to the parties.

KPST eshaw

Mutazem Shah

27.06.2023

JANNED KPST Peshawa

1. Clerk of learned counsel for the appellant present. Mr. Asad Ali Khan, learned Assistant Advocate General for the respondents present.

2. Former requested for adjournment due to engagement of learned counsel for the appellant before the Hon'ble Peshawar High Court, Peshawar. Granted. To come up for arguments on 24.10.2023 before the D.B. Parcha Peshi given to the parties.

(Fareeha Paul) Member (E)

(Rashida Bano) Member (J)

(Rozina Rehman) Member (J)

Kaleemullah

R.A No. 681/2022

<u>ORDER</u> 04.01.2023 Learned counsel for the petitioner present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present. Arguments on restoration application heard and record perused.

The application in hand has been filed by the petitioner for restoration of Service Appeal bearing No. 1335/2019 titled "Inamullah Versus The Chief Secretary Khyber Pakhtunkhwa Peshawar and 71 others", which was dismissed in default on 17.10.2022. It has been alleged in the restoration application that learned counsel for the petitioner was out of station, while the petitioner was unable to appear due to illness on the relevant date. The restoration application is supported by duly sworn affidavit. Moreover, law also favours adjudication by avoiding technicalities, therefore, restoration application in hand is allowed and service appeal bearing No. 1335/2019 titled "Inamullah Versus The Chief Secretary Khyber Pakhtunkhwa Peshawar and 71 others" is restored on its original number. To come up for arguments on 26.04.2023 before the D.B.

ANNOUNCEI 04.01.2023

(MIAN MUHAMMAD) MEMBER (EXECUTIVE) (SALAH-UD-DIN) MEMBER (JUDICIAL)



Form-A

FORM OF ORDER SHEET

Court of

Restoration Application No. 681/2022 S.No. Order or other proceedings with signature of judge Date of order Proceedings 1 3 The application for restoration of Appeal 15.11.2022 1 No.1335/2019 submitted today by Naila Jan Advocate. It is fixed for hearing before Division Bench at 29-11-22. Original file be Peshawar on requisitioned. Notices be issued to applicant and his counsel for the date fixed. By the order of Chairman REGISTRAR 29th Nov, 2022 None for the petitioner present. **SCANNE** Potices be issued to the petitioner and his counsel. To **:** T agome up for arguments on restoration application on 04.01.2023 before S.B. (Kalim Arshad Khan) Chairman

Service Appeal No. 1335/2019

17.10.2022

Nemo for the appellant. Mr. Mehtab Gul, Law Officer alongwith Mr. Naseer-ud-Din Shah, Assistant Advocate General for official respondents present.

The appeal in hand was called on for hearing after various intervals, however none appeared on behalf of the appellant till the closing time, therefore, the appeal in hand stands dismissed in default. Parties are left to bear their own costs. File be consigned to the record room.

1

ANNOUNCED 17.10.2022

(Mian Muhammad) Member (Executive)

(Salah-Ud-Din) Member (Judicial) 07.07.2022

Clerk of learned counsel for the appellant present. Mr. Muhammad Tufail, Assistant and Mr. Mehtab Gul, Law Officer alongwith Asif Masood Ali Shah, Deputy District Attorney for official respondents No. 1 to 6 present.

in an in the second

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments on 17.10.2022 before the D.B.

> (Mian Muhammad) Member (E)

for france in

(Salah-ud-Din) Member (J)

09.12.2021

Junior to counsel for the appellant and Mr. Noor Zaman, District Attorney alongwith Hamid Saleem, Law Officer for the respondents present.

Senior counsel for the appellant is stated to be busy before the Hon'ble High Court today. Request for adjournment is made by his junior. Request is accorded. To come up for arguments on 30.03.2021 before the D.B.

Proper DB not available The case is

(Salah-ud-Din) Member(J)

30-3-2022

10

https://etea.online/apply_police_dep_b1_2021/print

Adjourned to come up for the same as before on 7-7-2022 Reader

nar

01.03.2021

Due to COVID-19, the case is adjourned for the same on 01.06.2021.



01.06.2021

Appellant alongwith Miss. Naila Jan, Advocate, present. Mr. Hamid Saleem, Law Officer (Public Service Commission) and Mr. Hayat Khan, Assistant Director (Education Department) alongwith Mr. Kabirullah Khattak, Additional Advocate General for the official respondents present.

Joint para-wise comments on behalf of respondents No. 1 to 6 submitted, which are placed on file and copy of the same handed over to learned counsel for the appellant. Adjourned. To come up for rejoinder as well as arguments before the D.B on 02.08.2021.

(ATIQ-UR-REHMAN WAZIR) MEMBER (EXECUTIVE)

(SALAH-UD-DIN) MEMBER (JUDICIAL)

02.08.2021

Appellant in person present.

Mr. Kabirullah Khattak, Additional Advocate General alongwith Hamid Saleem, Law Officer for respondents present.

Appellant requested for adjournment on the ground that his counsel is not available today. Adjourned. To come up for arguments on 09.12.2021 before D.B.

Atiq-Ur-Rehman Wazir) Member (E)

(Rozina Řehman) Member (J)

Appenl No. 1335/2019

06.10.2020

Junior to counsel for the appellant, Addl. AG for the official respondents and Private respondents No. 30, 43, 44 and 46 in person present.

Learned AAG and private respondents No. 30, 43, 44 & 46 seek further time for submission of reply/comments. Nemo on behalf of *theriprivate hespolts* nor their reply received despite proper notice, hence proceeded against ex-parte. Learned AAG is required to contact the official respondents and facilitate the submission of reply/comments on next date of hearing. To come up for reply/comments of official respondents as well as private respondents No. 30, 43, 44 and 46 on 01.12.2020 as a last chance.

Chairma

01.12.2020

Junior counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General and Mr. Mehtab Gul, Litigation Officer, for official respondents are also present.

Neither written reply/comments on behalf of private respondents No. 30, 43, 44 & 46 have been submitted nor anyone on their behalf is present, therefore, they are proceeded against ex-parte.

Written reply/comments on behalf of official respondents have also not been submitted so far despite the last chance given in the previous order sheet dated 06.10.2020, therefore, the case is adjourned to 01.03.2021 on which data file to come up for arguments before D.B.

> (MUHAMMAD JAMAL KHAN) MEMBER (JUDICIAL)

03.04.2020 Due to public holiday on account of COVID-19, the case is adjourned for the same on 26.06.2020 before S.B.

Reader

26.06.2020 None for the appellant present. Addl: AG for respondents present.

Written reply not submitted. Learned AAG seeks time to submit the same on the next date of hearing.

Adjourned to 13.08.2020 before S.B.



13.08.2020 Junior to counsel for the appellant. Nemo for the respondents.

Fresh notices be issued to the respondents. Adjourned to 06.10.2020 on which date the requisite reply/comments shall positively be furnished.

Chairman

06.01.2020

Counsel for the appellant present.

One again learned counsel requests for time to prepare the brief regarding jurisdiction of this Tribunal as noted in the previous order. Adjourned to 06.02.2020 before S.B.

Chairn

06.02 2020

Counsel for the appellant Inamullah present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant alongwith others were recommended by the Public Service Commission for the post of ADO (BPS-16). It was further contended that a merit list was issued by the Public Service Commission wherein the appellant was shown at serial no. 144 and he was shown to have obtained 61/38 marks. It was further contended that on the basis of said merit list a seniority list was issued wherein the appellant was shown at serial no. 127. It was further contended that the Public Service Commission has not given additional two marks of his passing Pak Study subject although the Public Service Commission was required to issue further two marks for his passing Pak Study subject. It was further contended that due to non-giving to two additional marks his name was placed junior in the merit list as well as seniority list, therefore, the appellant filed departmental appeal but the same was rejected. It was further that the respondent-department is bound to issue two additional marks in the merit list and also to place his name at serial no. 67 instead of 127 in seniority list.

The contentions raised by the learned counsel for the appellant need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written freply/comments for 03.04.2020 before S.B.

> (MUHAMMAD AMIN KHAN KUNDI) MEMBER

103,738

Security & Mrocess Fee >

Form- A

FORM OF ORDER SHEET

	Court)f	· • • •
· '	Case No	1335/ 2019	· · · · ·
S.No.	Date of order proceedings	Order or other proceedings with signature of judge	· · ·
1	· 2	3	
1-	11/10/2019	The appeal of Mr. Inamullah resubmitted today by Naila Advocate may be entered in the Institution Register and put up to Worthy Chairman for proper order please.	the
2-	14/10/19	This case is entrusted to S. Bench for preliminary hearing to put up there on $27/1119$.	
27	11.2019	Counsel for the appellant present.	
•	i	Learned counsel requests for time to furthe prepare the brief regarding the jurisdiction of this Tribun in the instant matter when his grievance is against the Public Service Commission regarding allocation of mark or additional qualification.	al ne
		Adjourned to 06.01.2020 before S.B. Chairman	
• • •			

The appeal of Mr. Inamullah son of Taj Muhammad ADEO Establishment DEO Male Peshawar received today i.e. on 19.09.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1- Memorandum of appeal may be got signed by the appellant.

- Addresses of respondent Nos. 7 to 72 are incomplete which may be according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- L3- Affidavit may be got attested by the Oath Commissioner.
- ▲4- Copy of rejection order of departmental appeal dated 26.8.2019 mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- L5- Annexures of the appeal may be annexed serial wise as mentioned in the memo of appeal.

ad tomened all we objections.

Appeal her seen Signed. Completed. Appeal her seen sove completed. Advies of respirations

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(6) 66 more copies/sets of appeal I will provid to

Affidamit has been attested.

Eur official respondants

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★6- 66 more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1642 /S.T. Dt. 25-9-/2019.

REGISTRAR

SERVICE TRIBUNAL **KHYBER PAKHTUNKHWA** PESHAWAR.

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3/10/2019

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BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

·: .*

019 . Inamullah

<u>VERSUS</u>

Chief Secretary Khyber Pakhtunkhwa Peshawar and Others

<i>S</i> #	Description of Documents	Annex	Pages
1.	Grounds of Appeal		1-10
2.	Affidavit.		11
3.	Addresses of Parties.		12
4.	Application for condonation of Delay		12-A-
	· · · · · · · · · · · · · · · · · · ·		12-B
5.	Copies of Educational Documents	"A to C"	13-16
6.	Copy of Application form and	"D & E"	17-28
_	Appointment order		
7.	Copy of the Seniority List	"F"	29-39
8.	Copy of the Merit List & PCS	"G & H"	40-46
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10.	Other documents ·	"J"	48-53
11.	Wakalatnama		54

INDEX

Dated: 16/09/2019

Appellant

Through

Naila Jan

Advocate High Court Peshawar.

BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

Inamullah S/o Taj Muhammad, ADEO Establishment Office of the DEO (M) Peshawar.

-----(Appellant)

<u>VERSUS</u>

- 1. The Chief Secretary Khyber Pakhtunkhwa Peshawar.
- 2. The Chairman Public Service Commission.
- 3. The Secretary Elementary & Secondary Education Khyber Pakhtunkhwa.
- 4. The Director Elementary & Secondary Education Khyber Pakhtunkhwa.
- 5. The Secretary, Public Service Commission.
- 6. The Executive District Officer, Peshawar.
- Zia-ur-Rehman S/o Said Rehman R/o Village Babu Garhi, P.O Kababyan, Warsak Road, Peshawar at Serial No. 78 in the Seniority List.
- 8. Ihtisham Ul Haq S/o Fazal Haq R/o Mohallah Shabakhel Dheri Allahdhand, District Malakand at Serial No.79
- Rahim Khan S/o Hussain Khan at R/o Vill: & P.O Surigzai Payan,' Mohallah Mamkhede, District & Tehsil Peshawar, R/o Vill & P.O Surigzai Payan Distt & Tehsil Peshawar Mohallah Yousaf Khel at Serial No. 80
- 10.Muhammad Saleem S/o Ghulam Sarwar R/o H.No 1316/A Mohallah Hafiz Jamal Dera Ismail Khan, at Serial No.81
- 11.Sikandar Irfan S/o Faizullah Khan R/o Hashim Town near Baran Abad Kheikh Yousaf Road D.I Khan, at Serial No.82
- 12.Abdul Hafeez S/o Abdul Rashid H. No. 587-1-A, Tabkhi Street, D. I. Khan at Serial No. 83
- 13. Shah Jehan S/o Gul Rahim Khan R/o at Serial No. 84
- 14.Ishtiaq Ahmed Khan S/o Muhammad Akram Khan R/o Vill: Dhodial Nawan Shehr distt: Abbottabad at Serial No. 85

- 15.Mati Ullah Khan S/o Darawez Khan at Serial No. 86
- 16.Shabbir Ahmad S/o Qazi Fazli Hanan R/o Vill: P.O Umarzai Mohallah Parach-Khel, Tehsil & District Charsadda at Serial No. 87
- 17.Jamshed Khan S/o Mehmood Khan R/o VPO Bazar via Tordher Tehsil Lahor District Swabi at Serial No. 88
- 18. Riaz Khan S/o Mir Zali Khan at Serial No. 89
- 19. Rajab Ali S/o Mir Qadam Khan at Serial No. 90
- 20.Muhammad Tahir S/o Habib Jan R/o Medicos Near DHQ Hospital Timergara Distt: Dir Lower at Serial No. 91
- 21.Farman Ullah S/o Aman Ullah R/o VPO Chamkani Moh: Qadakhail, Tehsil & District Peshawar at Serial No.92
- 22.Syed Ikram S/o Syed Mutamed Khan R/o Hamad Medicos Malakand Road, Takht Bhai, Tehsil & P.O Takht bhai District Mardan Afzal Imam Colony at Serial No. 93
- 23.Muhammad Azam Khan S/o Gul Khan at Serial No. 94
- 24.Hameed ur Rehman S/o Saeed ur Rehman Assistant Director E&SE KPK at Directorate E&SE KPK, at Serial No. 95
- 25.Saeed Mahmood S/o Hazrat Mahmood R/o Vill: Sura P.O Nawagai Tehsil Daggar Distt: Buner at Serial No. 96
- 26.Fazali Qadir S/o Ali Asghar R/o Village Kohala Bala Moh: Chetian Qabran P.O Lora, Post code 22360, Rawalpindi at Serial No. 97
- 27. Fahim Jan S/o Alif Khan R/o VPO Landi Arbab, Moh: Ghari Malik Ahmad, Tajabad near Ring Road Peshawar at Serial No.98
- 28. Aurangzeb S/o Pidad Khan R/o VPO & Tehsil Alpuri District Shangla at Serial No.99
- 29.Asad Ullah Shah S/o Nawab Ali Shah R/o H.No 391/C Moh: Bhatia Bannu City at Serial No.100
- 30. Farman Ullah S/o Afsar Khan R/o GHS Jalsai, Distt: Swabi, Assistant Director at Directorate E&SE KP at Serial No.101
- 31.Abdul Waheed S/o Abdul Qadir R/o Vill: Akhora P.O Qalandarabad, Tehsil & Distt Abbottabad at Serial No.102

- 32.Altaf Hussain S/o Nasrullah Khan R/o VPO Dheri Allahdand, Moh: Baro, Malakand at Serial No.103
- 33.Muhammad Alamdin S/o Muhammad Iqbal Din R/o Vill: Landi Jalandar, P.O Azim Killa Teh & Distt Bannu at Serial No.104
- 34.Saleh Badshah S/o Lalbadshah R/o Vill: Nar Danishabad P.O EDOS Sultan Abad Serai Naurang Tehsil Serai Naurang Distt: Lakki Marwat at Serial No.105
- 35.Nasir Iqbal S/o Sakhi Marjan R/o Vill: Easak Chountra P.O Dabb Teh & Distt: Karak at Serial No. 106
- 36.Akbar Ghani S/o Fateh Muhammad R/o VPO Rabat Tehsil Balambat Dir Lower at Serial No. 107
- 37.Muhammad Azeem Khan S/o Nawab Khan Assistant Director at Directorate E&SE KPK at Serial No. 108
- 38.Sikandar Hayat S/o Sadiq Ullah R/o Mohallah Jous Khani, P.O Lahor (Sharqi) Tehsil Lahor District Swabi Officer of DEO E&SE Swabi at Serial No.109
- 39. Muhammad Noor Sultan S/o Dilawar Khan R/o Chah Malik Wala Near Govt: Degree Collage Tehsil Paharpur District D.I.Khan at Serial No. 110
- 40.Khawaja S/o Zarin Khan, Osharai Dir Upper at Serial No. 111
- 41.Wisal Muhammad S/o Dost Muhammad Office of DEO E&SE Mardan at Serial No. 112
- 42.Nisar Ahmad S/o Muhammad Saeed at Office of DEO Mardan at Serial No.113
- 43.Muhammad Iqbal S/o Baz Mula R/o Tehsil Wari Distt: Dir Upper at Serial No.114
- 44.Zaheer Ud Din S/o Muhammad Saeed R/o Vill: Lasho P.O Pingal Via Batkhela, Tehsil Timergara, Dir Lower at Serial No.115
- 45.Habib Ullah S?o Muhammad Aslam R/o VPO Tajori, Tehsil & District Tank at Serial No.116
- 46.Hafiz Fazl e Akbar S/o Gohar R/o VPO Shewa, Tehsil & District Swabi Moh: Firdaus Abad at Serial No.117
- 47.Mir Samad Khan S/o Hakeem Khan R/o New Tariq Electric Store Main Bazar Battagram at Serial No.118
- 48.Muhammad Ishtiaq S/o Muhammad Latif R/o H.No 13, Amin Colony Kohat Road Peshawar C/o Haroon Khan S/o Ahmad Khan at Serial No.119

- 49.Muhammad Naeem S/o Mumtaz Khan R/o H.No. R-6, University Campus, University of Peshawar at Serial No.120
- 50.Syed Anwar Ali Shah S/o Syed Mahmood Shah, Office of DEO E&SE Haripur at Serial No.121
- 51.Shah Zar Khan S/o Hafte Khan, Office of DEO E&SE Tank at Serial No.122
- 52.Muhammad Sharif S/o Sher Khan Office of DEO E&SE Kohat at Serial No.123
- 53.Abdul Qayyum Khan S/o Abdul Hanan, Assistant Director at Directorate E&SE KPK at Serial No. 124
- 54.Ihsan Ullah S/o Amar Sher, ADO Hayatabad Circle, Peshawar at Serial No.125
- 55.Habib Ullah S/o Muhammad Iqbal R/o H.No894, Murghuz, St No. 04, Afghan Colony Peshawar City at Serial No.126
- 56.Muhammad Hayat Khan S/o Masal Khan, ADO at the Office of DEO (F) Nowshera R/o Vill & P.O Taru Jabba & District Nowshera at Serial No.127
- 57.Sultan Muhammad S/o Ali Akbar R/o Sartaj Iron Merchant Arif Market B-24 Charsadda Road Mardan at Serial No.128
- 58.Muhammad Ishaq S/o Muhammad R/o Vill: & P.O Ghawar Kalay Sakha Kot Tehsil Dargai District Malakand at Serial No.129
- 59. Fayaz ud Din S/o Jehan Badshah, ADO at Office of DEO E&SE Dir Upper at Serial No.130
- 60.Muhammad Hussain S/o Mir Abbas Khan R/o Vill & P.O Surati Killa Tehsil T/Nasrati Distt: Karak at Serial No.131
- 61.Muhammad Asif Khan S/o Muhammad Akram Khan at Serial No.132
- 62. Ata Ullah Shah S/o Ubaid Shah R/o VPO Utla (Gadoon) Tehsil Topi, District Swabi at Serial No.133
- 63.Said Zamin Shah S/o Aqlmin Shah R/o Deputy District Officer (E&SE) Male Sama Ranazai Dargai Malakand Agency at Serial No.134
- 64.Umar Farooq S/o Bahramand R/o Vill: Karapa P.O Tehsil & Distt: Buner at Serial No.135
- 65.Syed Ihsan Ullah Shah S/o Syed Lal Badshah R/o H.No.2 St No.1 Mohallah Afghan Colony Peshawar at Serial No.136
- 66.Imtiaz Ali S/o Haji Hayat Gul R/o Ejaz Abad No.2 Riaz st. Gul Bahar No.4 Peshawar at Serial No.137

091-9213551 Phone 091-9211795 Fax Website www.kppsc.qov.pk



KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION Fort Road, Peshawar Cantt.

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SR-111-30/200)/2007 Mo. Dated 39 18.8 120214

The Secretary to Govt: of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Peshawar.

Subject:

Dear Sir.

3.

RECRUITMENT TO TWO HUNDRED & FOUR (204) MALE VICE PRINCIPAL (BPS-18) IN ELEMENTARY & SECONDARY EDUCATION DEPARTMENT. (ADVT: NO. 03/2018, S. NO. 22).

In contimution of this office letter No. PSC/SR-II/019295-96 dated: 12.09.2019 on the subject noted above and to state that the Commission provisionally recommends the following candidates to the Government for appointment against the posts of non-joiners vacated by M/s, Gul Khitab S/O Khani Zaqman of District Abbottabad/ 5, Alam Zeb S/O Fazal Rahim of District Swat/ 3, Gul Amin S/O Taj Muhammad Khan of District Nowshera/ 2 and Jameel Ahmad S/O Tarin Shah of District

47 a 41		
S.No.	Name with father's Name	
		District / Zone
	Afzal Shah S/O Habib Said M/o 2-7	
<u>}</u>	Sayed Mir Hussain S/O Sayed Ali Uursain	Mohmand Agy/1
	Wash Anmad S/O Rashid Abmad	Kurram Agy 1
4	Inamullah S/O Taj Muhammad	Dir Lower 3
	r1/3 31:	Peshawan?

Recommendation in favour of the recommendees is further provisional subject to their 2. medical fitness, verification of all documents and perusal of their PERs by the department at their own before appointment.

Inter Se-Seniority of all the recommendees will be conveyed after completion of remaining cases. The serial chronological order will not confer any right of seniority.

4 Original applications (with enclosures) of the above recommendees are enclosed herewith for your record.

Kindly acknowledge receipt.

fully Your

as Shah) etor Recruitment

ndst: No. PSC/SR-111 py forwarded for information to:-

The Director Elementary & Secondary Education Department, Pr

Breeton Rectation

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- 67.Suhbat Ullah S/o Rehmat Ullah R/o H.No 44, St No. 3, Phase 4 Hayatabad Peshawar at Serial No.138
- 68.Iftikhar Ali Khan S/o Zarif Khan R/o Moh: Rawani VPO Takkar Tehsil Takht Bhai Distt: Mardan at Serial No.139
- 69.Peer Muhammad Khan S/o Nadar Khan R/o Vill: Daskor Payeen P.O Wasi, Distt Dir Upper at Serial No.140
- 70.Sakin Shah S/o Muhib Ali Shah R/o Vill & P.O Urmar Payan, District & Tehsil Peshawar, Moh; Yousaf Khel at Serial No.141
- 71.Iran Gul S/o Naseer Khan R/o VPO Tajori (Gul Imam) Tehsil & district Tank at Serial No.142
- 72.Mushtaq Ahmad S/o Gul Zar Ahmad R/o H.No 9 St No: 5 Shinwari Town, Ring Road, Peshawar City at Serial No.143

-----(Respondents).

SERVICE APPEAL U/S 04 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 (I) AGAINST THE MERIT LIST DATED 10/02/2014 ISSUED BY RESPONDENT No. 4 & 5 WHICH HAS NEVER BEEN COMMUNICATED TO THE APPELLANT AND, (II) FINAL SENIORITY LIST DATED 15/08/2018 OF ADEO(S) AND ASDEO(S) (BPS-16) PREPARED ON THE BASIS OF THE MERIT LIST WHEREBY THE APPELLANT HAS BEEN WRONGLY PLACED AT SERIAL NO. 127 INSTEAD OF PLACING AT SERAIL NO. 67, (III) ORDER DATED 26/08/2019 WHEREBY THE **DEPARTMENTAL** APPEAL THE OF APPELLANT HAS BEEN REGRETED.

PRAYER

ON ACCEPTANCE OF THE INSTANT APPEAL, (I) THE MERIT LIST ISSUED BY RESPONDENT NO.4 MAY KINDLY BE REVISED BY ADDING 2 ADDITIONAL MARKS OF M.A PAK STUDIES AND CONSEQUENTLY (II) THE APPELLANT MAY KINDLY BE PLACED AT SERIAL NO.78 OF THE LIST AND ACCORDINGLY THE IMPUGNED SENIORITY LIST MAY KINDLY BE CORRECTED BY PLACING THE APPELLANT AT S.NO: 67 INSTEAD OF

S.NO.127 WITH ALL CONSEQUENTIONAL BENEFITS.

<u>Respectfully Sheweth</u>

- That the Appellant was highly qualified and has the qualification of M.A (Pashto), M.A (Pakistan Studies) and MEP. (Copies of Educational Documents are annexure A, B & C).
- 2. That the KPK Public Service Commission advertised some posts of ADO (BPS-16) in the Elementary & Secondary Education and the Appellant being eligible applied for the same and after by mentioning all his educational qualifications in his application form and after going through the selection process, the applicant was recommended for the post and subsequently the appellant was appointed vide Notification dated 05/05/2011 by the Respondent No.3. (Copy of Application form and Appointment order are "D" & "E").
- 3. That the Respondent No.3 issued final seniority list dated 15/08/2018, but the same was not communicated to the Appellant, however when appellant received the same, the appellant came to know that the same has been prepared on

the merit list of PSC which has never been communicated to the appellant. (Copy of the Seniority List is Annexure "F")

- 4. That thereafter, the appellant got the copy of the merit list, the appellant got the knowledge that the appellant has been placed at Serial No. 144 of the list by showing 61/38 marks obtained and the appellant was not awarded two additional marks of M.A (Pak. Studies). However, when the appellant applied for the result and other documents to the Respondent No.4 and 5. They refused to provide him the documents. However the appellant got relevant documents through RTI the whereby the Respondent No. 4 & 5 took the stance that the appellant claimed/ mentioned only M.A (Pashto) which marks awarded to the appellant. The appellant time and again approached the respondents for awarding additional marks according to the application form but in vain. (Copy of the Merit List & PCS Letter dated 03/01/2019 are annexure "G" & "H")
- 5. That the appellant approached time & again to the respondents for revising the merit list by awarding two additional marks on MA and subsequently placing

name of the appellant at proper place and correction of the impugned seniority list but in vain, hence the appellant filed a departmental appeal through proper channel on 15/05/2019, however, the same was rejected vide order dated 26/08/2019. (Copy of Departmental Appeal is annexure "I")

6. That the appellant has no other adequate remedy, hence to file the instant appeal on the following grounds inter-alia:-

GROUNDS:

- A. That the impugned merit list / seniority list and orders are against law, rules, principles of natural justice, hence void, ab-initio and liable to be set aside.
- B. That the appellant has mentioned two MA(s) i.e. M.A (Pashto) & M.A (Pak Studies) in his application to PCS and as per Khyber Pakhtunkhwa Public Service Commission Notification dated 15/12/2003 Rule 29 (K) the appellant was entitled for 4 additional marks, however, quite illegally the appellant was awarded only 2 marks, hence the appellant

2)

has been treated illegally. (Copy is annexure "J")

C. That due to the illegal merit list, in the impugned seniority list, the appellant name has been wrongly fixed which is also liable to be set aside and both the impugned merit list as well as the Seniority List are liable to be corrected and the appellant be placed Senior from all the private respondents.

D. That all those having additional qualification were treated in accordance with Rule 29 (K) of Public Service Commission Notification on 15/12/2003, however, the appellant has been subjected to discrimination by not treating under the above rules. Hence the Respondents violated Article 25óf the Constitution of Islamic Republic of Pakistan 1973.

E. That the illegal, discrimination and unconstitutional behavior of the Respondent are evident from the fact that, the appellant get the requisite document/ information through RTI.

F. That even in the impugned merit list, the appellant is entitle to be placed senior due to

older in age from the private respondent at S. No131 which is illegal.

c

G.Any other grounds will be raised at the time of arguments with the prior permission of this Hon'ble Court.

It is, therefore, requested that the appeal may kindly be accepted as prayed for.

Dated: 16/09/2019

Appellant

Through

Naila Jan/ Advocate High Court Peshawar.

BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

Inamullah

VERSUS

Chief Secretary Khyber Pakhtunkhwa Peshawar and

Others

AFFIDAVIT

I, Inamullah S/o Taj Muhammad, ADEO Establishment Office of the DEO (M) Peshawar, do hereby solemnly affirm and declare that all the contents of the accompanied appeal is true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

DEPONENT

Identified By:

Naila Jan Advocate High Court Peshawar.

BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

Inamullah

<u>VERSUS</u>

Chief Secretary Khyber Pakhtunkhwa Peshawar and

Others

ADDRESSES OF PARTIES

APPELLANT.

Inamullah S/o Taj Muhammad, ADEO Establishment Office of the DEO (M) Peshawar.

RESPONDENTS:

- 1. Chief Secretary Khyber Pakhtunkhwa Peshawar.
- 2. Chairman Public Service Commission.
- 3. Secretary Elementary & Secondary Education.
- 4. Director Elementary & Secondary Education Khyber Pakhtunkhwa.
- 5. The Secretary, Public Service Commission.

6. Executive District Officer, Peshawar.

Through

Zia-ur-Rehman S/o Said Rehman R/o Village Babu Garhi, P.O Kababyan, Warsak Road, Peshawar.

Dated: 16/09/2019

Appellant

Naila Jan

Advocate High Court Peshawar



BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

S.A _____/2019

Inamullah

<u>VERSUS</u>

Chief Secretary Khyber Pakhtunkhwa Peshawar and Others

APPLICATION FOR CONDONATION OF DELAY

RESPECTFULLY SHEWETH:

Applicant/Petitioner submits as under.

- 1. That the above mentioned appeal is filing before this Hon'ble Court in which no date is fixed for hearing so far.
- 2. That though the appellant is filing this appeal, within 30 days of communication of the final order, however if there is any delay, the same is condonable on the following grounds.

<u>GROUNDS;</u>

- A. That the appellant has not been communicated the merit list or seniority list.
- B.That everyone has been awarded 2 marks on M.A / Masters, however the appellant has not been treated equally and was discriminated and



not treated in accordance with notification dated 2003 and according to the judgment of Superior Courts that limitation no runs against discriminatory treatment.

- C. That the impugned notifications are void abinitio, being in violation of the Constitution of Islamic Republic of Pakistan 1973.
- D.That as per Supreme Court judgment no limitation runs against Seniority being recurring cause of action.
- E. That there number of precedents are of Supreme Court of Pakistan which provides that the cases shall be decided on merits rather than technicalities.

It is therefore requested that the limitation period (if any) may kindly be condone in the intrust of justice.

&

Through

Appellant Naila Jan

Huma Khan Advocates, High Court Peshawar.

<u>Dated: 16/09/2019</u>



Aniversity of Peshawar

(Pakistan) Session Annual 1995

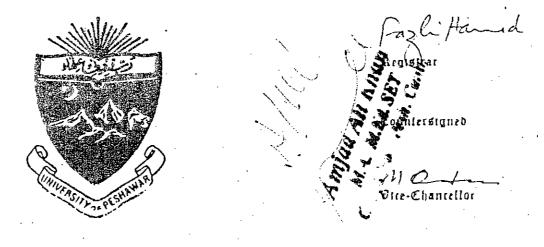
<u>INAMULLAN</u> <u>Son'</u> of <u>Taj Muhammad</u> and a student of <u>District Peshawar</u> having passed the prescribed examination held in <u>April</u>, 1996, is this day admitted by the University of Perhatent to the Degree of Master of Arts

> in the Second division. The subject of Examination being PASHTO' The Examination was taken as a whole / inoparts:

Serial Nº 021036 Registered Mo; 90-1-14117 Roll De. 10073 Presult declared on OCTOBER 14, 1996

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اكتوبرية ومبر الأالا

Certified that	Inam Ullah
s/o d/o	Taj Muhammad
of	District Muitan

has passed the I/H Annual Examination for the degree of Master of Arts of the academic session 1999 held in Oct-Nov,1999 and has been placed in Third Division. Having fulfilled the requirements he/she has.

been admitted to the degree of MASTER OF ARTS IN PAKISTAN STUDIES

in this University. Marks obtained : 422/1000

The examination was taken as XXX0le/in parts.

Multan, Dated

تاريخ تاريخان^{ون}

تصدیق کی جالی ہے کہ 🔬 انعام اللہ

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میں کا میاہے ، دکر

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حاسل كرد ينمين

لېدا ملمرره شراط يورې له 🗄

کی سند کا اٹل قرار دیا جاتا ہے

امتحان بيكسك بملكك بالاقساط وبأكبابه

کی بناء پرانہیں اس یو نیورٹی کی

تاج تمر ضلع ملتان

فرذ

مطالعه ماكتان

Allama Igbal Open Unibersity 22488 Boll No. AmJud 76.110.24427 انعام الله حريثة بنر Regn. No. INAMUL AH تاج سحسد son/daughter of ______ KUHAMMAD_____ ۱۹ ۹<u>۴ دی</u> مطلوب شرائط کمل کرنے ر having completed the prescribed requirements _19 👓 is swarded the degree of Bachelor of Education Re/She secured ____% marks and was placed كَ ذَكْرَى مُعْنَا كَكُنَ . المس في عند المس في في في في في في ماص كي . in ____ grade. And Billin دائس بيانسل Vice Chancellor - - - C Ma And Islamabad Bated : _ Bier Man, 1003. ,199A Controller of Examinations دارامتن ات This degree is to be read in conjection with the Transcript, issued separately. 125

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INSTRUCTIONS

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these instructions are for your guidance. Driver details the sheet from the application form. Read it carefully other filling the application form and sign it to tell on the code and and arbitrations duese instructions. Submit the application address with all the related documents to Secretary NOVAP Public Service Commission, 2-Port Road, and the related documents to Secretary NOVAP Public Service Commission, 2-Port Road, Peshawar Cantt.

Filling of Application Form - Fill legibly in gotte way mandwriting. Answer all columns. Write "not-applicable for "Nil" against column which does not apply to you or other information asked for is "Nil". Add waite sheer a southed any part of the application form inadequate :

Correspondence :- In your correspondence with the Correlation of the advertisement with serial number of the post upplied for and your postal address. It is the post of the Commission of changes in your postal address. The Commission does not accept any responsibility recommission of on mininger

Submission of Application Form :- The Application Forst contrastion through postal means or by hand. 2

Serving Candidates :- Candidates who are already in size ce of Government/Semi Government/Autonomous ć. Budies may apply direct to the Commission if they are usable to optimize departmental permission before the closing date for the applications. The Commission does not all the device a size departmental permission before the closing date for the applications. The Commission does not all the application and departmental permission before the closing roughly the application through the Department rows that size and dates must submit the certificate of the departmental permission on Form 'D' attached at page 6. The application of only within 30 days of the closing date failing that is the department of the data and the size of the application of the days of the closing date failing which their applications will be liable to rejection ...

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 - 3 years to candidates from Zor cs-1 and 3. (a)
 - (5) Period of service under Governmeat, if terminated for want of vapancy.
 - In case of Ex-Armed Forced Personnel, the entire period of service in Armed Forces or 10 years. (z)whichever is less.
 - (d)Special concession mentioned in the advertisement.

Age Relaxation :- All Administrative Departments are competent to grant age relaxation upto five years whereas Establishment and Administration Department is competent to deal with cases beyond this limit. Minimum age limit. however, cannot be relaxed in any case.

Certificates :- Send attested photo copies of the certificates and documents as listed in column 20 of the 1 application form. If a document does not apply to you write "not applicable" in the column for the page number. Only regular degrees or provisional certificates issued by the Controller of Examinations shall be accepted. Original certificates and testimonials are required at the time of interview.

- ù, Zones .- The Province is divided into five zones comprising the area listed below:
 - Zone 1:- Agencies of Bajaur, Mohmand, Khyber, Kurram, Orakzai North Waziristan, South (a) Waziristan and Frontier Regions attached to the to the District of Peshawar, Kohat, Bannu and Dera ismail Khun,
 - (b) Zone 2 :- Districts of Peshawar, Charsadda, Nowspare, Swabi and Mardon.
 - Zone 3:- Districts of Swat. Buner. Di , Chitral Kohistan, Shangla Par and Malanand Areas (Swaa (c) Ranizal and Som Ranizal and onclosere areas of Hazara Division i.e. (1) Haqa Upper Tanawal composed of Darband wrea of Tehsil Hampur and Shergarh area of District Mansenta and (2) Morged Areas composed of Baitagram including Hill Nilshang and Thakot, Aliai, Kaya Shabbal and Gadoon Area.
 - (d) Zone 4:- Districts of Dera Ismail Khan, Tank, Bannu, Lakki Marwat, Kohat and Karak.
 - Zone 5:- Districts of Haripur. Abbottabad, Mansehra excluding their backward areas included in (c) Zone 3.

10. Zonal Allocation :- Zonal allocation exists for posts to be filled through competitive examinations will be made as per Government policy.

\mathcal{U} . Domicile of Female Candidates :

(a) In the case of married female candidates their husband domicile will be required if they were married before entry into Government Service.

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Note: In case of your claim to an equivalent of the prescribed qualification, state if it is recognized by the University Grants Commission. Add.

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(a) Copy of the Charter of the Institution.
 (b) Syllabi of the Examination.
 (c) Copy of Detailed Marks Certificate.

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		Name of document.
	(2)	A copy of the Notification of admission and enrolment as a Pleader/Advocate, if you are a practising lawyer and claim benefit for age relaxation.
(0)	Ag	e Concession Certificate.

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(p) Certificate in support of any other claim not covered by the above.

(q) Any other document that you have attached.

Place .

Date

(r) I solemnly declare that to the best of my aknolwedge my replies are correct.

Signature of the Applicant

Page No.

Ati



Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

PH No. 091-9210437-38, 9210389

Notification.

Consequent upon the recommendation of the Khyber Pakhtunkhwa Public Service Commission, the Competent authority is pleased to appoint the following candidates against the post of Assistant Distt: officer (Male) in BPS-16 (Rs.6660-470-20160) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Management Cadre on the terms and condition given below with immediate effect.

SNO	0 Name	Father nam			•
		- uner nan	ne Domicile	: address	Services placed at the disposa of EDO (E&SE) for further
52	Abdul Waheed	Abdul Qadir	Abbottabad	Vill: Akhora PO Qalandarabad Tehsil & Distt: Abbottabad	
	Chanzeb Ishtiaq Ahmed	Zardad Khan Muhammad		Vill: Islam kot PO APS Abbottabad Tehsil & Distt: Abbottabad	Abbottabad
	Khan Muhainmad Asij Khan	<u>Akram Khan</u> f Muhammad	Abbottabad	Vill: Dhodial Nawan Shehr dist Abbottabad	Abbottabad t: Abbottabad
	Muhammad	Akram Khan		H.# TC 1864 Vill: Dhodial PO Nawan Shehr Abbottabad St: No	
5	Tanvir	Fagir [†] <u>Muhammad</u>	Abbottabad	St: No-10 Bilal Town Kakul Koa 4.Abad.C/o Sajid kariana Store Bilal Town	
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<u></u>	Shahz	ad Nadeem	Khurshid Ahmad	I	l Vil	l: Makhtoom Abad. P/O Chitra		
<u>_44</u>	Shara	f ud Din	Gul Nadir Khan	Chitral	Vil. Dis	l: & P/O Reshun, Tehsil Mastuj, tt: Chitral	Chitr	
45	kbar	Ghani	Fateh	<u>Dir L</u> ou	VP	O Rabat Tehsil Balambet Di	Chitr	
<u>46</u> A	li Ha	ider l	I	<u>Dir Lou</u>	0/0	EDO (E&S.E) Dir Lówer	<u>Dir L</u>	ower
_47B	akht 2	Zada N	and and	Dir Lou	Vill	Koz Kalay Tehsil Khall rict Dir Lower	Dir Lo	ower
48 Ir.	ntiaz	Khan G	Gul Zaman Khan I		C/0	master Electric Store Zia ket Timergara Dir Lower	<u>Dir Lo</u>	wer

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	SNC	Name	Father nam	c Domici		•
	 					Services placed at the disposal of EDO (E&SE) for further
	49	Muhammad Islar	Fateh Ul Mulk n Khan	Dir Lowe	C/O Muhammad Rahman Book DEPO Temor Palazah Main Baz rTimergara	ar
<i>2</i> :	1	Muhammad Khit		Dir Lowe	Vill: & P/O Tharai Tehsil	Dir Lower
	51	Muhammad Razo Shah	n Muhammad Hanif	Dir Lower	Moh [‡] Miangano Chum Vill: P/O Ouch Tehsil Adenzai Diette Die	Ť
?)	52	Muhammad Tahi	r Habib Jan	Dir Lower	Muhammad Tahri S/O Habib ja C/O Gul Medicose Near DHQ Hospital Timergara Distt: Dil(Lower	Din Louise
	53	Nasrullah Khan	Nadar Khan	Dir Lower	Vill: Khema Tehsil Balambat P.C Timargara Distt: Dir (Lower)	Dir Lower
	54	Wajihuddin	Fazal Mabood Jan	Dir Lower	Vill: Kandaro Payeen Tehsil Blaambat P/O timeraana Distu	
ú	55	Zaheerur Din	Muhammad Saeed	Dir Lower	Vill: Lasho P/O Pingal Via Batkhela, Tehsil Timagana Din	Dir Lower
	56	Hidayatullah	Khanzada Pach		Frontier Children's Academy, Phase IV, Hayatabad Peshawar	Dir Lower Dir Lower
		Njeeb Ullah	Saif Ullah	Dir Upper	VPO Gamseer Jabar Tehsil & District Dir Upper	Dir Upper
4	F	<u>Auhammad Iqbal</u> Peer Muhammad	Baz Mula	Dir Upper		Dir Upper
	<u>_ 59 k</u>	<u>Chan</u>	Nadar Khan	Dir Upper	Vill: Daskor Payeen P/O Wasi Distt: Dir Upper Mohallah Mazreen. Vill. & P/O	Dir Upper
ŀ	- 00/2	ahir ur Rehman	Mir Hussain	Hangu	Dallan. Tehsil, Thall. Distt: Hang C/O Tahir Hussain Lecturer	uHangu
╞		<u>bid Hussain</u>	Hussain Ghulam	Kurram Agency	Maths Department, University of Peshawar	Hangu
-	62 K	bdul Qayum han	Haji Lal Khan	Abbottabad	Moh: Zamin Shah, Depot Road Havelian, Tehsil & Distt: Abbottabad	
-	<u>63</u> A1	rshad Mehmood	Ghulam Nabi]	Moh: Sher Khan Havelian Abbottabad	Haripur Haripur
-	<u>64</u> Ifi	tikhar Ahmad	Mumtaz Ahmad	Abbottabad	VPO Banda Sahib Khan via Havelian distt: Abbottabad	Haripur
7-			Ali Asghar	Haripur	Vill: Kohala Bala Moh: Chetian Qabran PO Lora Post Code 22360 Rawalpindi	
-	<u>66 Ab</u>	dul Wahab	Abdul Ghafoor	Swabi	Moh: Babu Khel, VPO Kotha Tehsil Topi Distt: Swabi Vill: P/O Maini Moh: Shakri	Haripur
-	<u>67</u> Sa	id Bad Shah	Ali Ahmad	Swabi	Snaheedan Tehsil Topi Distt:	Haripur
			Zarghon Shah	i cui un	Tensu Takht-e-Nasrati, Distt: Karak	Karak
-	<u>69 Dil</u>	Nawaz Khan I	Dashat Mir	Nurak	Tehsil & Distt: Karak	Karak
-		<u>Faraz</u> hammad	hahid Khan	Karak	Vill: Kuch Banda PO, Tehsil & Distt: Karak C/O Rahimullah Jan Postman GPO Karak	Karak
1	<u>71 Far</u> Mul	oogG hammad	ul Raman R	Carak I	Distt: Tehsil & P/O Karak Vill: Mithawala	Karak
	72 Hai Mul	nayun S hammad	1		Mitha Khel	Karak
1-1	73 Hus	isain M hammad	lir Abbas Khan K	arak 1	Vil: & P/O Surrati Killa Tehsil	Carak

	SNO Nai					~ (/		
	· · ·	ne 	Father no	ame	Domici	le	address	Services plac at the dispos of EDO (E&S for further
lot		I	Sakhi Marja	in	Karak	Vill: Easak Cho Tehsil & Distt: F	untra P/O Dabb Carak	
	Chlore 11		Noor Muhammad			Vill: Walaki Mo Mitha Khel Tehs	habbat Khel P/	Karak
ľ	76 Noor Ajab Hafiz Muha		Khan		Karak	VPO Merozai Te		k Karak
ŀ	77Ziaullah Muhamma		Ajab Gul Wadud ur		Kohat	Kohat		Kohat
ŀ			<u>Rehman</u> Muhammad		Peshawar		City	Walat
•	79 Sayyar Kha		Ullah		Peshawar	Govt: Pri: Schoo P/O P.T.I Kohat	Road Pesh.Citu	K-h-h
43	80 Mushtaq Ah	mad	Gulzar Ahma	ıd	Peshawar	H# 9 St# 5 Shim Road Peshawar	Dam Town Ding	1
80	81 Rahim Khar	1	Hussain Khai	n	Peshawar	Vill: & P/O Surig Tehsil Peshawar Mamakhede	izni Pauan Diete	
-	82 Riaz Hussai	n	Taj <u>Muhamm</u>	ad i	Peshawar	C/O Ghulam Nal Islamabad PO Qi Peshawar City	bi & Sons Bazar issa Khawani	
/_	83Sakin Shah		Mohib Ali Sha		Peshawar	Vill: & P/O Urma Tehsil Peshawar Khel	ur Payan Distt: Moh: Yousaf	Kohat
36_	Syed Ihsan (84Shah	Illah S	Syed Lal Badshah		Peshawar	H.No 2 St No 1 M colony Peshawar	ohallah Afghan	Kohat
Ļ	Abdul Rehmi 85 Rashid	1	nayatullah Ja	Ľ	akki Iarwat	H.# 1159/118, Mo Tehsil & Distt: La	h. Khoided Wh	Kohat
-	86 Habib ur Ref		adshah Khan	L	akki larwat	VPO Shahbaz Khe Marwat	ka Marwat el Dist: Lakki	Lakki Marwat
-	87 Hamid Ullah		han Zaman	L	akki larwat	VPO Ghazni Khel Lakki Marwat	Tehsil & Distt:	Lakki Marwat
	88Hikmatullah		li Muhammaa	La	akki	Vill: Chandukhel I Tehsil S/Naurana	PO Kot Kashmir Distt: Lakki	Lakki Marwat
	89 Saleh Bad Sha	h La	il Badshah	La M	ukki arwat	Vill: Nar Danish A Sultan Abad Serai Serai Naurang.Dis Marwat	bad P/O EDOS Naurang Tehsi itt: Lakki	
_9	OTahir Ahmad .	Khan Kh	ian	M	in well	St Meric Khel Vill: Khel Distt: Lakki M	amuat VDV	Lakki Marwat
2	DI Muslim Khan	<u>An</u>	war Khan		jaur ency	Agency Education Khar Bajour Agenc	Office P/O	Lakki Marwat
_9:	2 Ghulam Sarwa	r <u>Gh</u>	ulam Yahya	Ma	lakand M	C/O Waqas Photo S Bahadar Khan Plaz Malakand	State Services, za Batkhela	Malakand
	3 Haya Said		an Said	Ma	lakand	PO Kot distt: Mala	ikand	Malakand Malakand
	1 Ihtisham ul Ha		al Haq	Mai	V IV	10h: Shabakhel Dh Ialakand Agency ill: & P/O Ghawar	eri alahdhand	Malakand
95	Muhammad Ish			Mal	akand M	uknakot Tehsil Dar lalakand	gai Distt:	Malakand
_96	Raees Khan	Kha	r Zaman n	Male	akand Co	ohallah Baro: Vill. ladand Malakand de#23010	Agency Post	
1	Said Zamin Shal	<u>1 Aqal</u>	min Shah	Mala	kand M	eputy District Offic ale Sama Ranazai alakand Agency	er(E&SE) Dargai	<u>Ialakand</u>
	Zakir Hussain	Huss	ain Gul	Mala	kand Ma	rman Medicose Sa Ilakand Agency	khakot Bazar	Talakand Talakand
	Fazli Subhan			Mala	Kand	O (M) Malakand		
	Altaf Hussain Thulam Jilani	Nasri Dariu	4	Malai		O Dheri Allahdand lakand M. Ishfaq Air Blue CA : Amin Hotel Lari Adda	, Mon: Baro,	alakand

t ~~	SNC	Name	Father name	Domicile	address	Services placed at the disposal of EDO (E&SE) for further
	102	Muhammod Ajmal	Jamal ud Din	Mansehra	GHSS Shergarah Tehsil Oghi distt: Mansehra	posting Mansehra
	103	Muhammad Ishtiaq	Muhammad Ayub	Mansehra	Vill: & P/O Shinkiari, Muhallah Panj, Ghole Distt: Tehsil Manschra	Mansehra
	104	Nadeem	Abdul Qayyum	Mansehra	Moh; Malral Vill: & P/O Dhodical Distt: & Tehsil Mansehra	Mansehra
	105	Naveed Ahmad	Muhammad Farid Khan	Mansehra	C/O Usman P/O Pakh wal Chowk Dab No.2 Mansehra Distt: Mansehra	Mansehra
	106	Rais ur Rehman Raja Babu	Noor ur Rehman	Mansehra	Vill: Shami Bala-P/O Dhodial Tehsil & Distt: Mansehra	Mansehra
	107	Jehangir	Raja Sultan Mubarik	Mansehra	Vill: & P/O Bahali, Tehsil & Distt: Mansehra Via Qalan Dar Abad	Mansehra
	108	Sarfaraz Khan	Shahabudd Din	Mansehra	C/O Usman General Store Near Shell Filling Station Mohallah Dab-2 Mansehra	Manschra
	109	Shafiqur Rehman	Abdur Rehman	Mansehra	Vill: Mohar khurd P/O lassan nawab Tehsil & Distt: Mansehar	Mansehra
	011	Syed Amvar Shah	Syed Mardan Shah	Mansehra	Al Quran children Academy Mohallha Upper jabri Near GPO Tehsil & DisttL Mansehar	Mansehra
	111	Amir Badshah	Tamash Gul	Mardan	Muhil Road Moh: Daggar PO Par Hoti District Mardan	Mardan
9	•	lftikhar Ali Khan	Zarif Khan	Mardan	Moh: Rawani VPO Takkar Tehsil Takht Bhai Distt: Mardan VPO Madey Baba, tehsil Takht	Mardan
		Khalid Khan Muhammad	<u>Khùn Bahadar</u>	Mardan	Bhai, Distt: Mardan Distt: Mardan Tehsil T/Bhai VPO	Mardan
		Anwar -	<u>Hazrat Umar</u> Muhammad	<u>Mardan</u>	Pirsaddi Bar Kanday Vill: & P/O Dheri Likpani Tehsil &	Mandan
		Muhammad Sadiq	Kamal	Mardan	Afzal Kutab Khana & General	Mardan
ŀ	116	Mukhtiar Khan	er Khan – Ismail Khan		Store Madina Market P/O Tehsil Takat Bhai Distt: Mardan Vill: Ghraibabad Nisatta Road	Mardan
}	117	Rohullah Jan	Misbahud Din	Mardan	Wear The Fazle Haq Collgee Mradan	Mardan
-	_118	Sultan Muhammad	Ali Akbar	Mardan	Sartaj Iron Mrchat Arif Market B- 24 Charsadda road Mardan	Mardan
3	119	Syed Ikram	Syed Mutamed Khan	Murdan	Hamad Medicose Malakand road Takhat Bhai Tehsil & P/O Takhat bhai Distt: Mardan Afzal Imam Colony	Man Jan
	120		Sahib Zada	Mardan	Vill: Pati Khud P/O & Tehsil Takht Bhai Distt: Mardan	Mardan Mardan
-	121/		Sultan Mahamood	Mardan	C/O NADRA Kiosk Centre, Lund Khawar Mardan	Mardan
-			Shamsul Qamar	resnawar	Mohallah Sadozai Vill: P/O Hazr Khwani, Peshawar	Mardan
·				Nowshera	District & Tabail Manual	Nowshera
	1	<u>Iuhammad Aftab</u> Iuhammad Hayat		vowshera	U JISTE NOURShana	Nowshera
	<u>125 K</u> 126 M	f	lian Fazale	voiosnera	Vill: & P/O Taru Jabba & Distr	Vowshera
	Δ.	luhammad		Volushera	Vill: Kurvi P/O Toru Johho Tohoil	Vowshera
	• 128 K	huhammad Sohail	fir Jaffar Khan	olushera		Nowshera

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	SNC	Name				
		Name	Father nam	e Domici	le address	Services placed at the disposal of EDO (E&SE)
	129	Muhammad Zah Khan			Vill: & P/O Taru Jabba Tehsil	for further posting
		Nasruminullah	Sher Zaman Khan Ullah	Nowshera	Khattak Colony Ashore Abad P/(Feroz sons Lab Aman Garh	Nowshera D
-		Yousaf Shah	Abdur Rahim	Nowshera	Vill: Amankat, P/O Mobib Bande	
- 1)9	132	Muhammad Ishtiag	Muhammad Latif	Peshawar	H/No 13 Amin Colony Kohat Rod Pesh C/O Haroon Khan Sta	,
	133	Bismilah Jan	Abdul Ghafar	Peshawar	C/O Hira Children Academy Muhammad Zai PO Gulozai Dalazak road Peshawar	<u>Nowshera</u> Peshawar
9 -	-134	Fahim Jan	Alif Khan	Peshawar	VPO Landi Arbab, Moh: Ghari Malik ahmad Taj Abad near Ring Road Peshawar	
6		Habibullah	Muhammad Iqbal	Peshawar	H.# 894, Murghuz St. No.04, Afghan Colony Peshawar City Moh: Mundozai VPO Hazar	Peshawar
		rshad Khan Khalil ur Rehman	Khushal Khan	Peshawar	Khwani Peshawar Village Shah Alam (Bahurci) BO	Peshawar
		Muhammad Saleem	Hastam Khan Muhammad Azeem Khan	Peshawar Peshawar	Nahaqi Distt: & Tchsil Peshawar Vill: & P/O Nasar Pur Peshawar	Peshawar
	130	Sakhawat Shah	S.Chiragh Shah		Vill: Hergoni P/O Wadpaga Tehsil & Distt: Peshawar	Peshawar
	140	Vagar Khan	sifut Ullah	Peshawar	Distt: & Tehsil Peshawar Vill: &P/O Masho Khel Kandi Fateh Khan Khel	Peshawar
1	1	ahir Shah	Sardar Khan	Peshawar	Qazi Abad St, No. 9 Tehsil & Distt: Peshawar P/O Pakha Ghulam	Peshawar Peshawar
ł		ia-ur-Belonan ia Ullah	Sai <u>rl Rehman</u> Zikria Khan	Peshawar Peshawar	Vill: Babu Garhi P/O Kaba Biyan Warsak Road Peshawar Hujra Dagai, Mohallah Arbab	Peshawar
	143 In 144	am Ullah	Taj Muhammad	Peshawar	Peshawar VPO Gulozai Tehsil & Diate	Peshawar
-	14511	idul <u>Halim</u>	Vanin	Shangla	o Camis Alpuri Shangla	Peshawar
9_	146 Au	rangzeh	Paidad Khan		Shangla	Shangla Shangla
			Haji Dilber Khan	Shangla	7, Ghazi Colony near Gora Qabristan, Peshawar	Shangla
			1	inabi -	Vill: Dagai Gadoon PO Dewal	Swabi
					Moh: Augub Khel VPO & Tabal	iwabi
		hammed Afsar I	lossan Zeb	indin i	/PO Islamia Distt: & Tehsil Swabi /PO Islamia Distt: & Tehsil Swabi Mah: Asser Abad	wabi
1		ammad Arif 1	luhammad	vabi S	loh: Parra VPO Kalu Khan Wabi	wabi
		e Wall Khan Y			aleem Khan Tehsil Distt: Swabi // 1/AR Hussain Distt: Swabi	vabi
		<u>i Midaminad - M</u>	uhammad 74	<u>endi</u> A	bad	vabi
			<u>idig Ullah</u> Pa hani		ohallah Jous Khani, P/O Lahor harqi) Tehisl Lahor Distt: Swabi _{Su} ill: Tail banda, PO Sudher,	

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SNO	Name Fathe	er name Domie	sile addre	ess Services plac at the dispos of EDO (E&S) for further
177 <u>157 Hafiz I</u>	azl- <u>c-Akbar Gohar</u>	Swabi	VPO Shewa, Tchsil & Di Moh: Firdaus Abad	stt: Swabi,
33 <u>158 Attaull</u>	ah Shah Ubaid S		VPO Utla (Gadoon) Tehs Distt: Swabi	
159 Farma	nullah Afsar Ki		GHS Jalsai, Distt: Swab	
Muhan 160 Nacem	ımad Husmit 1		vill. Gogdara Moh: Rahr P.O Tariq Abad Tehsil & Swat	Distt:
	Muhami mad Saeed Shafiq	nad Swat	Moh: Rehman Abad, Vill PO Rahim Abad, Tehsil I distt: Swat	Babuzai
<u> 162 Malik K</u>	sin and	Khan SWA	C/O Ali Zaman ghalla M Opp: Super Masood Coad Wazirabad Tehsil & Dist	ch Service
38 163 Subbat 1		llah SWA	l'eshawar	atabad
12 <u>164 Iran Gal</u> 6 165 Habib H	24.1	<u>han Tauk</u>	VPO Tajori (Gul Imam) 1 Distt: Tank	chsil &
	an Aslam	<i>Tank</i>	VPO Tajori, Tehsil & Dist	t: Tank
3 166 Abdul 12	1	shid D.I. Khan	II.# 587-1-A, Tabakhi Stre D.I.Khan	eet,
<u>167 Asma''''</u>	ah Mua Ullah Malik	D.J. Khan	Thoya Fazal PO Kachi Pa Khan Tehsil & Distt: D.I.K	inda Than
168 Khalid N	ucem Muhammu Antii	ad D.I. Khan	VPO Jatta Tehsil Parova, D.I.Khun	Distt:
169 Mahmoss		Than D.T. Khan	ll.# C/72 Moh: Moavia No Pahar Pur distt: D.I.Khan	1_
Muhanen 170 Sultan Muhamm	Dilunor K	han D.I. Khan	Chah Malik Wala Near Go Degree Collage Tehsil pahi Distt: D.I Khan	ar pụr
	Ghulam Sa ul Zarif Nawaz Ali		H/No. 1316/A Mohallah H. Jamal Dera Ismail Khan Mohalla Moavia Nagar Vil	afiz
173 Sikandar I	rfan Suizullah K		Hashim Town near Part	Khan D.I. Khan
Zamir Alm	ad Almad Nat	<u> </u>	Khiekh yousaf road D.I Kho Usman-e- Ghani Town Insi Gab (Kalon) D.I.Kl	755 1

Terms and conditions:-

1. Their services will be considered regular but without Pension & Gratuity in terms of Pertion-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. They will however be entitled to Contributory Provident Fund

in such a manner and at such rates as per prescribed by the Govt.

2. In case, he is already in Goot: service and working against pensionable post on requirer basis before 1st day of July 2001, without any service break, on application to Khuiter Pakhtunkhwa Public Service Commission through proper channel and selection by the Commission, is appointed and allowed choice of option either to retain here it of pension & gratuity as allowed to his under his previous terms of appriment or 'n avail the benefit of Contributory Provident Fund allowed to his

- 8
- 3. Their services are liable to termination on one month's notice from either side. In case of resignation without notice their one-month pay/allowances shall be forfeited to the Government.
- 4. They should join their posts within 30 days of the issuance of this notification. In case of fullure to join their posts within one month of the issuance of this notification, their appointment will expire automatically and no subsequent appeal etc shall be entertained.
- 5. Then would be on probation for a period of one year extendable for another one year.
- 6. The will be governed by such rules and regulations as may be issued from time to the Covt.
- 7. These services can be terminated at any time, in case their performance is found un visifactory during probationary period. In case of misconduct, they shall be proceeded against under the NWFP Removal from service (Special powers) Ordinance; 20. and the rules framed from time to time.
- 8. C^p anger report should be submitted to all concerned.
- 9. The MOOs concerned would furnish a certificate to the effect that the candidate have juin. The post or otherwise after one month of the issue of their posting orders.
- 10. The seniority will be maintained as determined by the Khyber Pakhtunkhwa Public Service Commission.
- $D_{i} = N^{-1}$. DA will be allowed to the appointees for joining their duties.

(Syeda Sarwat Jehan) Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.

Endst: No. 584-830/ File No.1/ADO(M)/M.C Dated Peshawar the _____/05/2011.

Copyrionwarded for information and necessary action to the: -

- 1. Accountant General Khyber Pakhtunkhwa Peshawar.
- 2. Director of Education (FATA) Warsak Road Peshawar.
- 3. Securitary Khyber Pakhtunkhwa Public Service Commission Peshawar.
- 4. All securive District Officers (E&SE) in Khyber Pakhtunkhwa with the instructions to all it the already working ADOs against the available vacancies of the Teaching Contract.
- 5. Age by Education Officers concerned.
- 6. D Set Accounts Officers /Agency Account Officers concerned.
- 7. P: the Secretary to Goet: Khyber Pakhtunkhwa E&SE Department.
- 8. P.: : the Director E&SE Khyber Pakhtunkhwa, Peshawar.
- 9. Al: Fleers concerned.

15/2011

Dy: Director (Estab) Elementary and Becondary Education Khyber Pakhtunkhwa Peshawar,

Final s/List. Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshaw PH No. 091-9225338, 9225339, Dinet Fax 091-9225339 IFICATION. N

In exercise of powers conferred under Sub Section (I) of Section-8 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No.XVIII of 1973) the Final Seniority List of ASDEOs/ADEOs Male (Management Cadre), BPS-16 of Elementary & Secondary Education Department is hereby notified for information of all concerned.

Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

File No. 1/ADEO (M) Management Cadre Seniority List/2018

__/2018. Dated Peshawar the 🖄

Copy forwarded to the: -

Endst: No.

- 1. Director Curriculum & Teacher Education Khyber Pakhtunkhwa, Abbottabad .
- 2. Director Education FATA Khyber Pakhtunkhwa, Peshawar
- 3. Director PITE Khyber Pakhtunkhwa, Peshawar
- 4. All District Education Officers (M) in Khyber Pakhtunkhwa
- 5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
- 6. P/A to Director E&SE Department Khyber Pakhtunkhwa.
- 7. The Deputy Director(EMISE), E&SE Department, with the request to upload the requisite Seniority List of E&SE Department website (<u>www.kpese.gov.pk</u>).
- 8. Master File

Dy: Director (Estab) Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KID (JER PAKHTUNKHWA, PESHAWAR, FINAL SENIORITY LIST OF ADEOs ASDEOs (BPS-16) REGULAR MANACUMENT CADRE MALE IN ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, CORRECTED UPTO 15-08-2018

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S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B, Ed	Date of birth	Domicile	Date of 1st: Apptt: in Education Department	Date of Apptt: on ADEO post	Remarks	
	Ghulam Habib	Muhammad Wali	M.Sc B.Ed.M.Phil	DEÓ Shangla	1997	6.5.1967	M.Agency	12.7.1989	5.20.2011		
2	Mehboob Ellahi	Rahmat Elahi	M.A M.Ed	DEO Chitral	1999	3.15.1970	Chitral	4.10.1995	5.5.2011		[
3	Muhammad Farooq	Gul Rehman		DEO Karak	1	2.3.1976	Karak		5.5.2011		
4	Abdul Qayum khan	Haji Lal Khan	M.Sc M.Ed	DEO Abbottabad	1998	4.8.1970	A.Abad	11.1.1995	5.5.2011		
5	Muhammad Zahid Khan	Sher Zaman	M.Sc M.Ed	DEO Nowsehra	1998		Nowshera	6.23.1997	5.5.2011		
6	Shamsul Islam Niaz	Niaz Muhammad	M.A B.Ed	DEO Charsadda	2000	*	Charsadda	01.11.2010	5.5.2011		_{
7	Sharafat Khan	Muhamad Aslam Khan	M.A M.Ed	DEO Abbottabad	1997		A.Abad		5.5.2011		
8	Mahmood Iqbal	Khairati Khan	MBA M.Ed	DEO(M) D.I Khan	2000		DI Khan	1.17.1998	5.5.2011		
9	Muhammad Irshad	Niaz Farid	M.A B.Ed	DEO Bannu	1999	<u></u>	FR.Bannu	1.31,2002	5.5.2011		\dashv
10	Muhammad Anwar	Hazrat Umar	M.A M.Ed	DEO Mardan	2002	3.1.1973	Mardan	6.24.1997	5.5.2011	· · · · · · · · · · · · · · · · · · ·	
i	Zia ullah	Zikriya Khan	M.Sc M.Ed	DEO Peshawar	1994	3.19.1970	Peshawar	5.28.1994	5.5.2011		_ `
1.12	Muhammad Ishfuq Khan	Muhammad Hussain Khan	M.A M.Ed	DEO Abbottabad	1993		A.Abad	12.13.1990	5.5.2011		_
13	Shams Ur Rehman	Malik ur Rehman	M.A.Edu	IDEO Manschra	1999		Mansehra	1.20.1996		<u> </u>	
14	Iftekhar Ahmad	Mumtaz ahmad	M.A M.Ed	DEO Haripur	1999		A.Abad		5.5.2011	INA C	
15	Ghulam Sarwar	Ghulam yahya	M.A.M.Phil	DEO MKD	1996	- 11-11-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1	MKD	5.8.1993	5.5.2011	16/18	
16	Muhammad Zubair	Sabz Ali Shah	M.A B.Ed	DEO Charadda	2001			2.11.1993	5.5.2011		
17	Fazli Khuda	Waris Khan	······································	DEO Mardan	2001		Charsada	1.22.1998	5.5,2011		
18	Muhammad .Rehman Shah	Gul Reliman Shah	f	DEO Bannu			Mardan	3.24.2003	5.5.2011		
19 1	Muhammad Sohail Khan		i	DEO Nowschra	2002		Bannu		5.5.2011		_
¥ 20 I	Auhammad Naseem			DEO Swat	2001		Nowshera	10.31.1996	5.5.2011	······································	
21	Ali Haidar				2001		Swat		5.5.2011		
			11.00 WI.LU	DEO Dir(L)	1991	1.5.1962	Dir	11.19.1986	5.5.2011		

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بر	Name & Designation	Father's name	Qualification	Place of posting	Year or parsing B.1.it	Date of birth	Domicile	Date of Ist: Apptt: in Education Department	Date of Appti: on ADEO post	Remarks
22		Muhammad .Hanif	M.A M.Ed	DEO Dir (L)	1991	12.18.1963	i Dir	5.11.1983	5.5.2011	·
23	Muhammad.Islam	Fatihul Mulk khan	M.A M.Ed	DEO Dir(L)	2001	4.10.1973	Dir	12.20.1994	5.5.2011	<u> </u>
_	Dil Nawaz Khan	Dashat Mir	M.Sc M.Ed	DEO Karak	2001	 1.3.1977	Karak	8.1.2006	5.5.2011	·······
-	Fida Muhammad	Firdoos khan	M.A M.Ed	P.O E&SE	2001	4.15.1977	Swabi	4.20.1999	5.5.2011	
	Muhammad Aftab	Masal khan	M.S (Edu)	DEO Nowsehra	2004	4.14.1978	Nowshera	6.23.1997	5.5.2011	
	Hayat khan	Nazeef khan	M.Sc.M.Ed	DEO Peshawar	2004	2.15.1979	Charsada	5.17.2011	5.23.2011	
	Muhammad Ajmal	Jamalud Din	M.A. M.A Edu	DEO Manschra	1999	1.2.1969	Mansehra	2.28.1993	5.5.2011	
	Salih Muhammad	Shad Muhammad	M.A M.Ed	DEO Nowsehra	1995	1.1.1967	Swabi	12.9.1989	5.5.2011	
30	Waheed Uliah Shah	Mazhar Ali Shah	M.A B.Ed	DEO Ваппи	1994	1.16.1968	Bannu	3.31.1992	5.5.2011	, <u>,, 11 , ,</u> ,,,,, ,,,,,,,, ,,,,,,,,,,,,
31	Khalid Naseem	Malik Muhammad Amir	M.Sc B.Ed	DEO DI Khan	2002	2.28.1976	D I Khan	4.21,1999	5.5.2011	**v
	Gul Faraz	Shahid Khan	M.A M.Ed	DEO Karak	1999	3.5.1970	Karak	10.8,1990	5.5.2011	
	Abudur Rehman Rashid	Inayat Ullah jan	M.Sc M.Ed	DEO Laki Marwat	1993	1.11.1971	L.Marwat	8.3,1999	5.5.2011	
4	Abdul wahab	Abdul Ghafoor	MA.M.Ed	DEO Swabi	1998	3.6.1971	Swabi	12.31.1993	5.5.2011	
5	Imtiaz khan	Taj Barin	M.Phil B.Ed	DEO Nowsehra	1996		Nowshera	5.30.1995	5.5.2011	
6 1	Hamced Ullah	Khan Zaman	M.A B.Ed	DEO L.Marwat	2003	1.12.1974	L.Marwat	9.1.2004	5.5.2011	
7 1	Muhammad Abid	Fazli Khaliq	M.A M.Ed	DEO Swabi	2002		Swabi	4:24.1998	5.5.2011	
	Muhammad Azam	Badashah Islam	M.Sc M.Ed	DEO Swat	2001		MKD	1,1770	5.10.2011	
9 F 	Raees Kahn	Johar Gul	M.A M.Ed	DEO Khoistan	2000		Khy: Agency:	9.21.1998	5.23.2011	-10% 118-
-+	Adil Muhammad	Ghani Muhammad	M.Sc M.Ed	DEO Mardan	2004	· · · · · · · · · · · · · · · · · · ·	Swabi	5.7.2011	5.5.2011	- <u>v/{ % </u>
	Shah Jehan khan	H.Aslam khan	M.Sc M.Ed	Assistant Director	2004		Peshawar	5.5.2011	5.5.2011	<u> </u>
2 1	love Dan	Amin Jan	M.A B.Ed	DEO Dir(U)	1997		Baj Agy:	4.19.1995	5.10.2011	
	Amir Badashah	Tamash Gul		DEO Mardan			Mardan	5.5.2011		· · · · · · · · · · · · · · · · · · ·
N	Auhammad Hamayun	Salam Gul	M.A M.Ed	DEO Karak	2003				5.5.2011	······································
5 N	liaz Wali Khan	Muhammad Yousaf	M.A M.Ed	DEO Swabi	1997		Karak Swabi	10.12.1995	5.5.2011	· · · · · · · · · · · · · · · · · · ·

 		Father's name	Qualification	Place of posting	Yean (s) pawang - B, J a	Date of birth	Domicile	Date of 1st: Apptt: in Education Department	Date of Apptt: on ADEO post	Remarks
		Abdul Halim	MA.M.Ed	DEO Nowshera	2001	4.25.1972	Nowshera	12.7.1992	5.5.2011	/
-17		Abdur Rehman	M.A M.Phil (Edu)	DEO Mansehra	1008	1.12.1973	Mansehra	1.31.1995	5.5.2011	
48		Nasrullah	MA.M.Ed	DEO Charsadda	2000	8.17.1974	Charsada	7.13.1997	5.5.2011	· · · · · · · · · · · · · · · · · · ·
49	Raees Ur Rehman	Noor Ur Rehman	M.A M.Ed	DEO Manschra	1991	2.13.1966	Mansehra	3.15.1986	5.5.2011	
50	Muhammad Zarif	Nawaz Ali	M.Sc M.Ed	DEO DI Khan	1994	···-	DIKhan	5.26.1997		
51	Muhammad Tariq	Noor Ali Khan	M.A M.Phil	DEO Валпи	1998		Bannu	5.5.1999	5.5.2011	<u> </u>
52	Hamid Rasool	Abdur Rasool	M.A M.Ed		1997		Bannu	9.1.2006	5.5.2011	
53	Qadir Shah	Sahib Khan	M.A M.Ed	DEO L.Marwat	2000	·	L.Marwat	5.10.2005	5.5.2011	
54	Muhammad Arshad	Wadood Ur Rehman	M.A B.Ed	DEO Charsadda	2000	·	Peshawar	8.16.1997	5.10.2011	
55	Irshad Khan	Khushal khan	M.A M.Ed	PITE	2003	·	Peshawar	┝╼━━━━─┤	5.10.2011	-
56	Syed Attullah shah	S.\yed Muzarab shah	M.Sc M.Ed	AD Directorate	2001		Mohd Ay:	5.15.1999	5.5.2011	
57	Shahzad Nadeem	Khursheed Ahmad	M.A M.Ed	DEO Chitral	2002		Chitral	5.5.0011	5.10.2011	
58	Habib Ur Rehman	Badashah Khan	M.A M.Ed	DEO L.Marwat	1993		L.Marwat	5.5.2011	5.5.2011	
59	Abdul Samad	Muhammad Miskeen	M.A M.Ed	DEO Haripur	1998			12.16.1990	5.5.2011	<u> </u>
60	Chanzeb	Zardad Khan		DEO Abbottabad		×	Manschra	12.19.1990	5.10.2011	
61	Raja Babu Jahangir	Raja Sultan Mubarak	M.A B.Ed	DEO Mansehra	1999		Abbott Abad	5.5.2011	5.5.2011	
62	Qaisar Khan	Muhammad Nawaz Khan	M.A M.Ed	DEO Karak	2000		Mansehra	5.5.2011	5.5.2011	
63	Sharaf Uddin	Gul Nadar Khan	M.A B.Ed	DEO Chitral	1994		R. Bannu	4.20.1999	5.10.2011	Non John
64	Imtiaz khan	Gul Zaman khan	+	DEO Dir(L)			Chitral	3.1.1991	5.5.2011	
65	Muhammad Kihtab	Gulab	· <u> </u>	DEO Dir(L)	1992		Dir	5.16.1987	5.5.2011	
66	Bakhat Zada	Mahan Gul		DEO Dir(L)	1994		Dir	12.10.1990	5.5.2011	
67/2	Zia ur Rehman	Said Rehman		DEO Da(C) DEO Peshawar	1995		Dir	4.25.1992	5.5.2011	
68 1	htisham ul Haq	Fazal Hag		DEO MKD	1996	·	eshawar	1.1.1994	5.5.2011	
69 N	Muhammad Saleem	Ghulam Sarwar		DEO DI Khan	2000	1.1.1973 N	1KD	05.04.1999	5.5.2011	

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	Name & Designation	Father's name	Qualification	Place of posting	Yearso passiog B. F.J	Date of birth	Domicile	Date of Ist: Apptt: in Education Department	Date of Apptt: on ADEO post	Remarks
70	Sikandar Irfan	Faiz Ullah Khan	M.Sc M.Ed	DEO DI Khan	199A	9.11.1972	D I Khan	1.13.1996	5.5.2011	
71	Abdul Hafiz	Abdur Rashid	M.Sc M.Ed	DEO DI Khan	1996	3.8.1974	D I Khan	3.1.1993	5.5.2011	•
72	Ishtiaq Ahmad Khan	M.uhammad kram khan	M.A M.Ed	DEO Abbottabad	2002	5.14.1968	A.Abad	6.11.1987	5.5.2011	
73	Mati Ullah khan	Darwaiz khan	M.A M.Ed	DEO DI Khan	2001	1.3.1978	FR.Bannu	5.5.2011	5.12.2011	
74	Shahbir Ahmad	Fazie Hanan	M.A M.Ed	DEO Charsadda	2001	4.30.1973	Charsada	2.23.1998	5.5.2011	
75	Jamsheed Khan	Mehmood khan	M.A M.Ed	DEO Swabi	2002	1.1.1977	Swabi	1.11.2000	5.5.2011	- <u>-</u>
76	Riaz khan	Mir Zale khan	M.A M.Ed	DEO Валли	2000	3,8.1972	Bannu	4.23.1996	5.24.2011	· · ·
77	Rajab Ali	Mir Qadam khan	M.A M.Ed	DEO Bannu	2000	4.15.1970	SW Agy:	10.31.1994	5.10.2011	· ·
78	Muhammad Tahir	Habib Jan	B.Sc M.Ed	DEO Dir(L)	1997	5.14.1972	Dir	8.31.1994	5.5.2011	
79	Farman Ullah	Aman Ullah	M.a M.Ed	DEO Peshawar	2000	1,1,1975	Peshawar		5.5.2011	
80	Syed Ikram	Syed Mutamed Khan	M.A M.Ed	DEO Mardan	2002	3.15.1975	Mardan	6.24.1997	5.5.2011	······································
81	Muhammad Azam Khan	Gul khan	M.A B.Ed	DEO Bannu	2002	7.18.1977	FR.Bannu		5.10.2011	
82	Hameed Ur Rehman	Saeed Ur Rehman	M.A M.Phil (Edu)	Assistant Director	2000	4.4.1978	Peshawar	11.7.2005	5.10.2011	
83	Saeed Mehmood	Hazrat Mehmood	M.A M.Ed	DEO Buner	1995	1.7.1967	Bunir	6.1.1996	5.5.2011	<u> </u>
84	Fazle Qadir	Ali Asghar	M.A M.Ed	DEO Haripur	1995	4,10.1967	Haripur	9.17.1986	5.10.2011	· · · · · · ·
85	Faheem Jan	Alif Khan		DEO Peshawar		3.15.1969	Peshawar	5.5.2011	5.5.2011	
86	Aurag Zeb	Paidad khan	M.A M.Ed	DEO Shangla	1998	4.10.1969	Shangla	5.5.2011	5.5.2011	1/1/18
87	Asad Ullah Shah	Nawab Ali Shah	M.A M.Ed	DEO Bannu	1994	4.7.1969	Bannu	9.1.1994	5.5.2011	10/10/10
88	Farman Ullah	Afsar Khan	MA.M.Ed	DEO Swabi	1998	2.2.1971	Swabi	9.1.1992	5.5.2011	γ_{ζ}
89	Abdul Waheed	Abdul Qadir	M.A M.Ed	DEO Abbottabad	1999	3.14.1971	Abbott Abad	5.5.2011	5.5.2011	
90	Altaf Hussain	Nasrullah Khan	M.Phill M.Ed	DEO MKD	1999	4.7.1971	MKD	4.13.1996	5.5.2011	
91	Muhammad Alamdin	Muhammad Iqbal Din	M.A B.Ed	DEO Bannu	1995	4.5.1971	FR. Bannu	5.26.1999	5.5.2011	
92	Saleh Badashah	Lal Badashah	M.Sc M.Ed	DEO L.Marwat	1998	9.1.1971	L. Marwat	4.23.1996	5.5.2011	
93	Akber Ghani	Fateh Muhammad	M.A M.Ed	DEO Dir(L)	1998	5.7.1972	Dir	3.17.1992	5.5.2011	<u> </u>
				al and a second s	1	L	1	1	·	

94		Father's name	Qualification	Place of posting	Yras passag Bolst		Domicile	Date of Ist: Apptt: in Education	Date of Apptt: on ADEO post	Remarks
95		Nawab Khan	M.A M.Ed	Assistant Director		1.3.1973	NW Agy:	Department	<u></u>	
	Sikandar Hayat	Sadiq ullah	MA.M.Ed	DEO Swabi	1992	11.20.1973		16.06.2004	5.12.2011	
96		Dilawar Khan	M.A M.Ed	DEO DI Khan	2000	2.22.1976	Swabi D I Khan	9.1.1992	5.5.2011	
97	Wisal Muhammad	Dost Muhammad	MSc.M.Ed	DEO Charsadda	2001	8.11.1979	Charsada	4.21.1999	5.5.2011	·
98	Nisar Ahmad	Painda Gul	M.A. M.Ed	DEO Mardan	1991	1.1.1964		5.10.2011	5.10.2011	······································
99	Muhammad Iqbal	Baz Mulla	M.A.M.Ed	DEO Dir	1991	11.20.1964	Baj Agy:	10.15.1992	5.10.2011	
	Zahcerud Din	Muhammad Saced	M.Sc M.Ed	DEO Dir(L)	1991	1.2.1965	Dir Dir	5.5.2011	5.5.2011	
	Habib Ullah	Muhammad Aslam	M.A B.Ed	DEO Tank	1996	2,2,1974		7.12.1999	5.5.2011	
	Hafiz Fazl e Akber	Gohar	M.A M.Ed	DEO Swabi	200.2	4.5.1978	Tank	4.1.1993	5.5.2011	
	Mir Samad Khan	Hakeem Khan	M.A M.Ed	DEO Battagram	2002	-1403 	Swabi	1.21.1997	5.5.2011	
	Muhammad Ishtiaq	Muhammad Latif	M.A M.Ed	DEO Peshwar	2004	5	Batgram	11.22.1999	5.5.2011	
	Muhammad Naeem	Mumtaz Khan		DEO Karak	2004		Peshawar	5.6.1996	5.5.2011	
	Syed Anwar Ali Shah	Syed Mehmood Shah	M.A M.Ed	DEO Charsadda	200.2	·	Karak		5.5.2011	
	Muhammad.Sharif	Sher khan	M.A M.Ed	DEO Hangu	1998		Mohd Agy	5.13.2011	5.23.2011	
┈╌┼┈	Abdul Qayum khan	Abdul Hanan	M.Sc B.Ed	Assistant Director	2000		Kuram	12.3.1994	5.10.2011	
	hsan ullah	Amar sher	M.A M.Ed	DEO Mansehra	1997	300	Bannu	11.7.2005	5.23.2011	·····
	fabib Ullah	Muhammad Iqbal		DEO Peshawar	1997	·	Mohd Agy:	1.17.1995	5.10.2011	
	Auhammad Hayat Khan	Masal khan		DEO Nowshera	2000		Peshawar		5.5.2011	1/1 d
	ultan Muhammad Khan	Ali Akber		DEO Mardan			Nowshera	6.23.1997	5.5.2011	10 allo
	Iuhammad Ishaq	Muhammad		DEO MKD	2004		Mardan	4.29.1999	5.5.2011	
	ayaz uddin	Jehan Badashah	- <u> </u>	DEO Dir (U)	2001		UKD	10.27.1994	5.5.2011	
	luhammad Hussain	Mir Abas Khan		DEO Karak	2004	··	Dir	5.5.2011	5.5.2011	
	uhammad Asif Khan	Muhammad Akram Khan		DEO Abbottabad	1996	··	Karak	5.5.2011	5.5.2011	· · · · · · · · · · · · · · · · · · ·
17 A	tta Ullah Shah	Ubaid Shah	M.A (Edu)		1996	10.5.1964 A	bbott Abad	5.5.2011	5.5.2011	······································

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S.#		Father's name	Qualification	Place of posting	Yraesti pateiog H. Fa	Date of birth	Domicile	Date of Ist: Apptt: in Education Department	Date of Apptt: on ADEO post	Remarks
<u> </u>	Umar Faroog	Aqalmin Shah	M.A B.Ed	DEO MKD	1995	1.8.1965	мкр	10.10.1986	5.5.2011	
120		Bahramand	M.A B.Ed	DEO Buner	1994	1.18.1966	Bunir	2.8.1990	5.5.2011	· · · · · · · · · · · · · · · · · · ·
	Syed Ihsan ullah Shah	Syed Lal Badashah	M.A M.Phil	DEO Peshawar	1996	5.1.1966	Peshawar	11.10.1994	}	
	Imtiaz Ali	Haji Hayat Gul	M.A B.Ed	Assistant Director		10,12,1966	Peshawar	11.10.1994	5.5.2011	······································
	Iftekhar Ali khan	Zarif khan	M.A M.Ed	DEO Mardan	1996	3.4.1958	Mardan	2.2.1000	5.5.2011	
	Pir Muhammad khan	Nadir khan	M.A M.Ed	DEO Dir (U)		5.9.1968	Dir	3.3.1992	5.5.2011	
	Sakin Shah	Muhib Ali Shah	M.A M.Ed	GHS Urmar	1998	10.4.1969		5.19.1987	5.5.2011	
╶──┼	Iran Gul	Naseer Khan	M.Sc M.Ed	DEO Tank	1997	· · · ·	Peshawar	3.17.1992	5.5.2011	
126	Mushtaq Ahmad	Gulzar Ahmad		DEO Kohat		4.2.1970	Tank	4.6.1999	5.5.2011	
127 I	Inam ullah	Taj Muhammad	M.A M.Ed	DEO Peshawar		12.20.1970	Peshawar		5.5.2011	
28 1	l'ahir Ahmad	Rab Nawaz Khan	M.Sc M.Ed	DEO L.Marwat	1998	*******	Peshawar	4.19.1994	5.5.2011	
29 7	Lahir Qamar	Shamsul gamar	M.Sc B.Ed	DEO Limarwat	1999	n	L.Mrwat	2.21.1998	5.5.2011	
30 /	Vjeeb ullah	Saif ullah	M.A M.Ed		1999		Peshawar		5.5.2011	
31 1	Vali ur Rehman	Fojun khan	M.A M.Ed	DEO Dir (U)	2000	·····	Dir	5.5.2011	5.5.2011	·
32 S	Jrshad Ali	Ali Afsar	M.A M.Ed	DEO Battagram	2000		Batgram	5.5.2011	5.5.2011	
33 Si	aid Badashah	Ali Ahmad		DEO Abbottabad	2000	5.9.1977	A.Abad	4.11.1996	5.5.2011	Č
34 H	afiq M.uhammad Ziaullah	Ajab gul		DEO Haripur	1991	3.1.1965	Swabi	11.26.1986	5.5.2011	111 a
55 A	bdul Halim	Yamin		DEO Kohat	1995	1.1.1967 1	Kohat	12.4.1985	5.5.2011	NUMATO
36 Sy	ved Anwar Shah	Syed Mardan shah		DEO Shangla	1998	4.6.1968	Shangla	11.10.1994	5.5.2011	Vister
7 R	ooh Ullah Jan	Misbahuddin		DEO Mansehra	1995	3.19.1969	Mansehra	3.26.1990	5.5.2011	
8 As	smat ullah	Atta Muhammad	· · · · · · · · · · · · · · · · · · ·	DEO Mardan	1995	1.5.1970 N	Mardan	3.24.1992	5.5.2011	
9 Na	isrumin ullah	Khan ullah	†	DEO DI Khan	1994	9.1.1970 E) I Khan	11.19.1992	5.5.2011	
	odullah Kahn			GHS Amangar	1994	12.12.1970 N	Nowshera	12.10.1990	5.5.2011	
+	shad Mehmood	Zargohan shah	MA.M.Ed	DEO Karak	1994	2.12.1971 K	Larak	11.19.1994	5.5.2011	

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تى) S.#	Name & Designation	Father's name	Qualification	Place of posting	Усо . / раклод В 14	Date of birth	Domicile	Date of Ist: Appt1: in Education Department	Date of Apptt: on ADEO post	Remarks
	Muhjammad Irfan	Mian fazle dayan	M.A B.Ed	DEO Nowshera	1975	10.01.1972.	Nowshera	12.9.1999	5.5.2011	
143	Wazir Zada	Sahib zada	MA.M.Ed	DEO Mardan	1996	+15.1972	Mardan	2.27.1992	5.5.2011	
	Munibur Rehman	Abdul ghafoor	M.A M.Ed	DEO Abbottabad	1998	9.10.1973	Abbot Abad	3.23.1992	5.5.2011	
	Sajjad Rasheed	Abdur Rasheed	M.A M.Ed	DEO Peshawar		K, S, 1970	Peshawar	5.7.1996	5.10.2011	
	Noor Ajab khan	Noor Muhammad khan	M.A B.Ed	DEO Karak	2001	6.4.1972	Karak	5.7.1770	5.5.2011	
47	Bismillah Jan	Abdul ghafar	M.Sc M.Ed	DEO Peshawar	2000	+ 27.1974	Peshawar	7.1.1997		<u></u>
48	Muhammad Sadiq	Muhammad kamal	MSc.M.Ed	DEO Mardan	2002	1.6 1974	Mardan	7.16.1997	5.5.2011	
49	Hashmim khan	Muhammad Nawaz Khan	M.A B.Ed	DEO L.Marwat	2001	1 15.1975	L Marwat		5.5.2011	
50	Muhammad Ishfaq Elahi	Farman Elahi		DEO Battagram		11.10.1976		5.10.2011	5.10.2011	· · · · · · · · · · · · · · · · · · ·
51	Sajjad Ahmad	Qazi fazle Hanan	M.Sc M.Ed	DEO Charsadda	2001	st	Peshawar		5.23.2011	·······
52	Khalil Ur Rehman	Hastanı khan	M.A M.Ed	GMS Jati Bala	· /	4.3.1977	Charsada	3.10.2007	5.10.2011	
53	Wajid Ud Din	Fazal Mabood Jan	M.A M.Ed	DEO Dir (L)	1998	1.14.1966	Peshawar	10.17.1988	5.5.2011	
54 H	Haya Said	Mian said	M.A M.Ed	DEO MKD	1998	24.11.1967.		8.29.1994	5.5.2011	
55 5	Sir Mast khan	Mir Rehman	M.A M.Ed	PITE	2004	<u>6/24/1905</u>	MKD	15.02.1990	5.5.2011	
56 /	Aman ul Mulk Shah	Said Ali Shah	M.A M.Ed		1998	., et- <u></u>	Mohd Agy:	12.7.1989	5.23.2011	
57 N	Muhammad Tahir	Sawal Faqir	M.A M.Ed	DEO Buner	1999	•	Bunir	5.31.1994	5.5.2011	
58 S	S.Sakhawat Ali shah	S.Chirgah shah		DEO Dir(U)	1998	K.18,1969	Dir	16.08.1887	5.13.2011	
59 N	Jasrullah khan	Nadar khan	M.A B.Ed	DEO Peshawar	1998	5.15.1970	Peshawar	10.16.1988	5.5.2011	- LAN A TET
	anas khan			DEO Dir(L)	2000	1.1.1971	Dir		5.5.2011	N/S/81
	ahir ur Rehman	Lal Rahim	MSc.M.Ed	DEO Charsadda	2001	2.2.1971	Charsada	1.14.1998	5.5.2011	
	loor Muhammad	Mir hussain	M.Sc M.Ed	DEO I fangu	2000	2.6.1973	Hangu	12.16.1999	5.5.2011	
	1ukhtiar khan	Said Muhammad	M.A B.Ed	DEO Dir (L)	2000	1.2.1975	Baj Agy:		5.10.2011	u
		Ismail khan	MSc.B.Ed	DEO Mardan	1999	1.7.1972	Mardan	4.11.1996	5.5.2011	······································
	hafig ur Rehman	Zia ul haq	M.B.A M.Ed	DEO Abbottabad	2002	5.25.1972	Abbot Abad		5.5.2011	······································
	akir Hussain	Zia ul haq Hussain Gul		DEO Abbottabad DEO MKD	2002		Abbot Abad. MKD	23.04.1998	5.5.2011	<u>, </u>

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, <u>"</u> 7 S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passiog B. 1 d	Date of birth	Domicile .	Date of 1st: Apptt: in Education Department	Date of Apptt: on ADEO post	Remar}
166	Yousaf Shah	Abdur Rahim	M.S (Edu)	DEO Nowshera	1999	3.27.1973	Nowshera	5.28.1995	5.5.2011	
167	Zahir Shah Khan	Sardar Khan	MSc.M.Ed	DEO Peshawar	2000	4.3.1973	Peshawar	9.25,1993	5.5.2011	
168	Sajd Ullah	Zahir Shah	M.Sc M.Ed	DEO Charsadda	1999	4.30.1974	Mohd Agy	1.1.2001	5.10.2011	
<u> </u>	Said Zahid	Faiz Mehmood	M.A M.Ed	DEO Buner	2000	4.1.1975	Bunir	6.20.1993	5.5.2011	
	Khalid Khan	Khan Bahdar				4.6.1975	Mardan			
	Kîramat ullah	Sattar zZman	M.A B.Ed	DEO Karak	1999	4.12.1975	FR.Bannu		5.23.2011	
	Muhammad Afsar	Hassan Zeb	M.A M.Ed	DEO Swabi	2002	1.5.1976	Swabi	4.20.1999	5.5.2011	<u> </u>
	Hamood ur Rehman	Maqbool ur Rehman	MA.M.Ed	Assistant Director	2001	5.15.1977	Peshawar	5.5.2009	5.5.2011	
	Taj Alam	Sher Alam	M.Sc B.Ed	DEO DI Khan	2002	11.20.1977	FR.Bannu		5.23.2011	
	Abdul Karim	Jehinger Khan	M.A M.Ed	DEO Peshawar	200,3	6.16.1981	Peshawar	2.23.2007	5.10.2011	
176	Miftah uddin	Akber khan	M.A M.Ed	DEO Chitral	1993	10.17.1961	Chitral	12.29.1984	5.5.2011	
177	Abid Hussain	Hussain Ghulam	M.Sc B.Ed	DEO Kohat	1998	6.16.1968	Kurram	10.10.1995	5.5.2011	
	Ejaz Ahmad	Ghulam Mohi Ud Din	MA B.Ed	DEO (M) Peshawar		1.4.1970	Peshawar		7.8.1905	
	Muhammad Ishtiaq	Muhammad Ayub	M.Phil (Edu)	DEO Mansehra	1994	2,15.1970	Mansehra	12.15.1990	5.5.2011	
<u> </u>	Muhammad Arif	Muhammad Junaid khan	M.Sc M.Ed	DEO Swabi	1997	4.14.1971	Swabi	9.19.1995	5.5.2011	
181	Zamir Ahmad khan	Ahmad Nawaz Khan	M.Sc M.Ed	DEO DI Khan	1995	4,12.1973	D I Khan	2.15.1996	5.5.2011	, N/
182	Shakeel Ahmad	Muhammad Ahmad	M.Sc M.Ed	DEO DI Khan	2000	5,16,1973	D I Khan	1.14.1998	5.10.2011	VX
183		Muhammad Azeem Khan	M.A M.Phil (Edu)		1996	1.6.1974	Peshawar	5.19.1994	5.5.2011	
184		Munawar Khan		DEO Abbottabad		12.25.1974	Abbot Abad		5.5.2011	10-1
185	Jehingeer Khan	Shah Jehan	M.A M.Phil (Edu)	DEO Charsadda	1999	4,15.1975	Peshawar	2.19.1998	5.5.2011	
186	Nisar Muhammad	Bahdar Khan	M.A M.Ed	DEO L.Marwat	1999	11.19.1975	L Marwat	5.15.2002	10.205.2011	
187	Zafar Iqbal	Amir Badashah				12.10.1975	Peshawar	<u> </u>		
188	Khamsul Haq	Mian Habib Jan	MA B.Ed	DEO (M) Peshawar		- E (1999	ļ			-
100	Waseem Fazal	Fazlu Rehman	M.B.A M.Ed	DEO Abbottabad	1994	6.20.1967	A.Abad	10.1.1985	5.13.2011	

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	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of 1st: Apptt: in Education Department	Date of Apptt: on ADEO post	Remarks
	20 Tahir Shah	Qadar shah	MA.M.Ed	DEO Battagram	1993	9.1.1968	Mardan	12.1.1987	5.13.2011	•••••
19		Abdul Ghani	MA B.Ed		1	1.9.1969	Karak		5.15.2011	
19	2 Raees Khan	Sher Zaman Khan	M.A.M.Ed	DEO MKD	1997	08.05.1972	МКД	10.00.1000		
19	3 Shams ur Rehman	Hafiz Abdul hadi	M.A.M.Ed	DEO Battagram	1994	3.13.1967	Hangu	18.08.1993	5.5.2011	
19		Mir Hatim Shah	M.A M.Ed	DEO Charsadda	1997	3.11.1971	Charsada	2.3.1990	5.27.2011	······
	5 Sahib Kamal	Haji Fazal Zaman	M.A M.Phil (Edu)	DEO Nowshera	2000	5.11.1972	Nowshera	01.04.1996	5.5.2011	
	5 Saeed Ahmad	H.Delber Khan	M.Sc M.Ed	DEO Shangla	2000	10.4.1972	Shangla	3.22.1992	5.23.2011	
	Tariq Ahmad	Fazli Rashid	M.A M.Ed	DEO Shangla	2002		Dir	1998	5.5.2011	
198	Muhammad .Arshad Sarif	Sharif Khan	M.A M.Ed	DEO Kohat	2002		Kohat	5.1.1999	7.23.2011	
199	Ulfat Ali Shah	Daftar Shah	M.A B.Ed	DEO DIKhan	1995	····-	SW Agy:	4.9.1999	5.13.2011	
200		Mumtaz ali khan					Peshawar	1.29.2002	5.13.2011	<u> </u>
201		Khan Zada Pacha	M.Sc B.Ed	DEO Dir(L)	1996		Dir	4151002		
202		Sultan Mehmood	M.A M.Ed	DEO Mardan	1996		Mardan	4.15.1993	5.5.2011	
203		Sadin Khan	M.A M.Ed	DEO Hangu	1998		Kurram	12.22.1994	5.5.2011	
	Javaid Iqbat	Ghulam Qadar	M.A M.Ed	DEO Mardan	1999		Baj Agy	6.21.1992	5.10.2011	
	Malik Khan	Shehzad Khan	M.A M.Ed	DEO Tank	1996		SW Agy:	5.2.2011	5.12.2011	- 10 Price Price
	Naveed Ahmad	M uhammad Farid Khan	M.A M.Ed	DEO Manselira	2002		Mansehra	9.24.2003	5.5.2011	18/8/0
	Fazli Subhan	Fazli hanan	M.A M.Ed	DEO MKD	أ ·-		MKD	1.23.1996	5.5.2011	<u> </u>
	Sarfaraz Khan	Shahab Ud Don	M.A M.Ed	DEO Mansehra	1992		do-	15.02.1990	5.5.2011	
_	Shahab Ud Din	Fazal Manan		DEO Tank				10.11.1994	5.5.2011	
	Sana ullah	Muhammad Sher Khan	M.A M.Phil (Edu)	DEO Bannu	2000		IW Agy:		5.23.2011	
	Nadeem	Abdul Qayum	M.A M.Phil (Edu)	DEO Mansehra	2000		R.Bannu	10.6.1994	5.10.2011	
212	Ghulam Jilani	Darwaish	M.A M.Ed	DEO Mansehra			lansehra	2.3.2007	5.5.2011	

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S.# Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of Ist: Apptt: in Education Department	Date of Appit: on ADEO post	Remarks	
13 Syed Mehmood ul Hassan	Syed Sarwar Shah	M.A B.Ed	DEO Abbottabad		20.3.1970	Abbot Abad	5.5.2011	5.5.2011		—
14 Rab Nawaz	Gul Dad Khan		DEO Abbottabad		· 4.15.1973	Abbot Abad		5.5.2011		-
15 Jehanzeb Ali	Fariq Khan	M.A M.Ed	DEO Charsadda	2000		Mohd Agy:	05.12.2011	5.12.2011	<u></u>	
16 Sange Faras	Malook	M.Sc M.Ed	DEO Charsadda	2001		Mohd Agy;	2,3,2011			
17 Muhammad .Ijaz	Mir sahib Khan	B.A M.Ed	DEO Tank	ll				10.05.2011		
18 Aqil Wazir	Gul Nazeer			1999		SW Agy:	9.12.2002	5.10.2011		-
19 Maroof Khan		M.Sc B.Ed	DEO L.Marwat	2003	1.3.1980	FR. Laki	9.5.2002	5.10.2011		
	Akhya jan				4.7.1975	FR. Bannu				

CERTIFICATE:

It is certified that the Seniority List is Final, Undisputed and not Subjuidice in any court.

Deputy Director (Estab) E&SE Khyber Pakhtunkhwa PESHAWAR

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Τо

Ю KHYBERPUKHTUNKHWA. PUBLIC SERVICE COMMISSION 2 Fort Road, Peshawar Cantt, (Near Governor House) <u>PH No. 9213563</u> 9213750,9214131 Fax No. 9211795 Fax No. 9211795 No. PSC-/_____ **ull**19367

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The Secretary to Govt of Khyber Pakhtunkhwa Elementary & Secondary Education Department

PROVISION OF MERIT LIST OF A.D.O (B-16) IN E& SED.

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I directed to refer to your letter No:SO (S) 3-2/09 Reg: Dated 16.05.2009 $\int c (SIN)$ on the subject noted above and to forward the **Above** inter se merit of Male A.D.O (B-16) for your record and necessary action please.

					TN: etwict	
, {	Merit	Total	D.O Birth	Name with Father name	District	
÷. Ц	Order	Marks		and all the	Peshawar/2	
A CONTRACT & SOCORGER	1	70/45	01.09.73		Moh:Agy/1	
S & M	1 2	69/45	05.06.67		Chitral/3	
S S S	3.	69/45	15.03.70	Mendood fram 5/0 realine	Karak/4	
- 40 y c	4	69/45	03.02.76	Muhammad Falood 370 Gui Iturite	Abbottabad/5	-1.
	· <u>5</u> .	68/45	08.04.70	Abdul Qayyum Khan S/o Haji Lal	/10001120-2-1	
2 I I I I I	F			Khan	Nowshera/2	
	6.	68/45	22.11.73	Muhammad Zahid Khan S/o Sher		
				Zaman Shams ul Islam Niaz S/o Niaz	Charsadda/2	
•••••	7.	68/45	01.01.78			
_		_		Muhamad Sharafat Khan S/o Muhammad	Abbottabad/5	
. 1	8.	68/40	10.05.70			
ĥ		<u> </u>		Aslam Khan Mahmood Iqbal S/o Khairati Khan	D.I Khan/4	
نسركم	9.	67/45	01.12.67	Humayun khan S/o Muslim khan	Charsadda/2	
1	10		15.05.69	Muhammad Irshad S/o Niaz Farid	F.R. Bannu/1	
; *~·	<u>11</u>		16.04.76	Muhammad Anwar S/o Hazrt Umar	Mardan/2	
· •	$\frac{12}{12}$		01.03.73	Zia Ullah S/o Zikria Khan	Peshawar/2	
- 11/	13		19.03.70	Muhammad Ishfaq Khan S/o	Abbottabad/5	rarra ~
*	14	1. 67/38	06.05.68	Muhammad Husain Khan		
				Shams ur Rehman S/o Malik ur	Mansehra/5	
الثلي ا	û¶(¥ 1≦	5. 66/43	15.11.74	Rehman		
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43	10		25.12.69	Ghulam Sarwar S/o Ghulam Yahya	MKD/3	<u>se</u>
			21.05.72	Muhanmad Zubair S/o Sabz Ali	Charsadda/2	100 V
	<u>-</u>   1	8. 66/45	19.07.72	Shah		Dates -
5		0 ((145	06.01.76	Fazle Khuda S/o Waris Khan	Mardan/2	p a
·••		9. 66/45 0. 66/45	23.02.76	Muhammad Rahman Shah S/o Gul	Bannu/4	ļ
		0. 00/43	23.02.70	Rahman Shah		
		1. 66/43	22.03.71	Muhammad Sohail Khan S/o Mir	Nowshera/2	ľ
	4	1. 00145	22.05.71	Jaffar Khan		
		2. 66/40	08.09.70	Fazal Wahab S/o Ahmad Gul	Buner/3	
۰.		23. 66/40		Muhammad Naseem S/o Husnul	Swat/3	
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		24. 66/38	05.01.62	Ali Haider S/o Bahadar Khan	Dir/3	4
		25. 66/38		Muhammad Raza Shah S/o	Dir /3	
	4	25.100/30	, 10.77.07	Muhammad Hanif		
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		65/45		2.79		TZL C/o Nozeet K Dall		Aans	ehra/5
		65/43		1.69	Muha	mmad Aimal S/o Jamai u		Swab	
		65/40		)1.67	Salih	Muhammad 5/0 Shad		,	
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	55.	00/10		-	OL-h		Anwar	Khy:	Agy/1
	34.	65/40	02.	11.73	Abdu	I Malik S/o Muhammad	hammad	D.I I	Chan/4
	35.	65/40		02.76	Khal	d Naeem S/o Malik Mul	Intraster		
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	36.	65/38	03	.08.69	Abdı	ıl Khalid S/o Muhamma	۳ (	•	
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	37.	65/38		.03.70	Gul	Faraz S/o Shahid Khan	navat	L.M	arwat/4
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	, U .		1 I	_	Ulla	h Jan ul Wahab S/o Abdul Gh	foor	Swa	abi/2
<u> </u>	39	65/38		5.03.71		TZI DIA LOI BRIEGU			wshera/2
├		65/3	3 08	3.02.73	Imt	az Khan S/o Taj Bareen lus Samad Jan S/o Sultar	h Ahmad	Pes	hawar/2
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Ļ		51. 64		05.03.7		iaz Wali Khan S/o Muha	ammad.	10	Wabhz
ł		52. 64	/40	00.00.7				-+;	Nowshera/2
Ļ		<u> </u>	/40	25.04.		ousat Iuhammad Saleem S/o A	Apqui	1	10112220
R		53. 64	/40	25.0	T	Islaam		- 17	Manshera/5
		54. 64	/40	12.04.	73 5	Shafiq ur Rehman S/o Ab	oaur		
×	l	34, 0-	n - V		1 1	) - h-man			Charsadda/2
	┝	55. 6	1/40	17.08.	74	Ahmad Ullah S/o Nasr U Rais ur Rehman S/o Noo	r ur Rehma		Mansehra/5
	├	56. 6		13.02		Rais ur Rehman 5/0 1000	hman S/o		Haripur/S
			4/38	01.03	.69	Muhammad Saeed ur Re		1	
				1		Abdul Hadi Muhammad Zarif S/o Na	awaz Ali		D.I Khan/4
	<u> </u>		4/38	25.07		Muhammad Zarii 5/0 M Muhammad Saeed S/o M	Auhammad	ī	Swat/3
	<b> </b>	59. 6	4/38	21.04	.70	-1 C		. 1	•
	ĺ			+		Shafiq Muhammad Tariq S/o N	loor Ali Kl	nan	Bannu/4
			54/38	28.0		TTamid Dasool S/O ADO	IF Rasour		Bannu/4
			54/38	02.00		Hafiz Arshad Ali S/o M	luhammad		Mardan/2
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			<u></u>	+	1 60	Ashraf Ali S/o Abdulla	ah Khan		F.R. Bannu/1
			64/35			Carlin Chap S/o Sahib S	shan		L.Marwat/4
			63/45		1.74	Muhammad Arshad S/	o Wadud u	r	Peshawar/2
	ł	65.	63/45	22.0	2.74	Dohman			Peshawar/2
	-		(2145	14	3.74	Irchad Khan S/o Khush	hal Khan		Pesnawaliz
			63/45		)2.76	Syed Ataullah Shah S/	o Syed		Moh;Agy/1
	Į	67.	63/45		JZ./U	lac t Chab			Chitral/3
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	ł	68.	63/4:	5   01.	04.11	1.4.3			L.Marwat/4
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M.A=> morks P.S+J, , Service.	81. 63/	35 18.04.1	<ul> <li>73 Rahim Khan S/o Hussain k</li> <li>70 Muhammad Saleem S/o Gh</li> <li>Sarwar</li> </ul>	han	Peshawar/2
P.STZ X S	82. 63/3	25 11 00			D.I Khan/4
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			Akram Khan		Abbottabad/5
	86. 62/4 87. 62/4		8 Mati Ullah Khan S/o David		
	88. 62/43				R Bannu/1
÷	89. 62/42	08 03 73	<u></u>	17/1	Charsadda/2 wabi/2
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•	91. 62/40	14.05.72	Muhammad Tali		W.Agy/1
	92. 62/40	01.01.75	Muhammad Tahir S/o Habib Farman Ullah S/o Aman Ullah Sved User	an D	ir/3
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	02/40	18.07.77	Azam K han C/a		ardan/2
	95. 62/40	04.04.78		-	R.Bannu/1
		[	Hameed ur Rehman S/o Saeed Rehman	ur Pe	shawar/2
	96. 62/38	07.01.67	Saeed Mahmood S/o Hazrat		
ł	97. 62/38	+	_/ mannood	Bu	ner/3
ŀ	98. 62/38	10.04.67	Fazali Oadir S/o Ali Apple		
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		}	Asad Ullah Shah S/o Nawab Al Shah	i Ban	nu/4
<u> </u> -	101 62/38	20.02.71	Farman Ullah S/o Afsar Khan		
	102 62/38 103 62/38	14.03.71	About Waneed S/o Abdul O 1	Swa	bi (Disable)
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		05.04.71	Alamdin C/a		akand/3
 	105 62/38	01.09.71	Iviunammad Ighal Din	FRE	3annu/1
	106 62/38	18.11.71	Saleh Bad Shah S/o Lal Bad Shah	h L.Ma	irwat/4
	10/ 62/38	07.05.72	Nasir Iqbal S/o Sakhi Mar Jan Akbar Ghani S/o Fateh Muhamm	Kara	k/4
	108 62/38		A AZEEM Khon C/a NL	ad Dir/3	*
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132 61/3	8 05.10.64	Muhammad Asif Khan S/o	
		Muhammad Akram Khan	Abbottabad/5
133 61/3		Ata Ullah Shah S/o Ubaid Shah	
134 61/3	8 08.03.65		G.Swabi/3
135 61/3		Umar Faroog S/o Bebramand	Malakand/3
136 61/3	8 01.05.66	Syed Ihsan Ullah Shah S/o Syed Lal	Buner/3
		Bad Shah	Peshawar/2
137 61/3		Imtiaz Ali S/o Haji Hayat Gul	Deal 10
138 61/3		Subbat Ullah S/o Rehmat Ullah	Peshawar/2
139 61/3		Iftikhar Ali Khan S/o Zarif Khan	S.W.Agy/1 Mardan/2
140 61/38	09.05.68	Peer Muhammad Khan S/o Nadar	Dir/3
141 61/38		Khan	
142 61/38		Sakin Shah S/o Muhib Ali Shah	Peshawar/2
143 61/38		Iran Gul S/o Naseer Khan	Tank/4
144 61/38		Mushtaq Ahmad S/o Gul Zar Ahmad	Peshawar/2
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146 61/38	04.01.74	Muhammad	
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147 61/38	07.03.74	Riaz Hussain S/o Taj Muhammad	
148 61/38	03.02.75	Zahir Qamar S/o Shams ul Qamar	Peshawar/2
149 61/38	20.02.76	Irfan Ali S/o Gouhar Ali	Peshawar/2
150 61/38	16.11.76	Ajeeb Ullah S/o Saif Ullah	Charsadda/2
151 61/38	04.01.77	Wali ur Rahman S/o Fojun Khan	Dir/3
152 61/38	09.05.77	S.Irshad Ali S/o Ali Afsar	Battagram/3
153 61/35	01.03.65	Said Bad Shah S/o Ali Ahmad	Abbottabad/5
154 61/35	01.01.67	Hafiz Muhammad Ziaullah S/o Ajab	Swabi/2
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155 61/35	06.04.68	Abdul Halim S/o Yamin	Shangla/3
156 61/35	19.03.69	Syed Anwar Shah S/o Syed Mardan	Mansehra/5
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				Nowshera/2
62	61/35	10.01.72	Muhammad Irfan S/o Mian Fazli Dayan	
63	61/35	15.04.72	Wazir Zada S/o Sahib Zada	Mardan/2 Abbottabad/5
	61/35	10.09.73	Munib ur Rehman S/o Abdul	Abbollabad/J
			Ghafoor Hikmatullah S/o Ali Muhammad	L.Marwat/4
	61/35	26.10.73	Sajjad Rashid S/o Abdul Rashid	Peshawar/2
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168	60/40	27.04.74	Bismillah Jan S/o Abdul Ghaffar	Peshawar/2
	60/40	06.06.74	Muhammad Sadiq S/o Muhammad	Mardan/2
		15.01.75	Kamal Hashim Khan S/o Muhammad	L.Marwat/4
170	60/40	15.01.75	Nawaz Khan	Peshawar /2
171	60/40	10.11.76	Muhammad Ashfaq Elahi S/o	Pesnawar /2
	 	<u> </u>	Farman Elahi	Charsadda/2
	60/40	03.04.77	Sajjad Ahmad S/o Qazi Fazli Hanan	Peshawar/2
173	60/38	14.04.66	Khalil ur Rehman S/o Hastam Khan	Dir/3
	4 60/38	24.11.67	Wajih ud Din S/o Fazal Mabood Jan	MKD/3
17	60/38	02.01.69	Haya Said S/o Mian Said	Moh:Agy/1
	6 60/38	01.02.69	Sarmast Khan S/o Mir Rehman	Buner/3
	7 60/38	25.03.69	Aman ul Mulk Shah S/o Said Ali Shah	
		18.08.69	Muhammad Tahir S/o Sawal Faqu	Dir/3
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	82 60/38	06.02.71	Zahir ur Rehman S/o Mir Hussain	Baj:Agy/1
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	88 60/3		3 Yousaf Shah S/o Abdur Rahim	Peshawar/2
	189 60/3		3 Zahir Shah S/o Sardar Khan	Moh:Agy/1
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	191 60/3		5 Muhammad Sheraz S/o Naseeb Gu	Buner/3
	192 60/		Said Zahid S/o Faiz Mahmood	Mardan/2
	193 60/.		Khalid Khan S/o Khan Bahadar	FR.Bannu/1
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	196 60/		77 Hamood ur Rehman S/o Maqbool	
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	208	60/35	25.12.74	Zafar Khan S/o Munawaar Khan	Abbottabad/5
	209	60/35	15.04.75		Peshawar/2
	210	60/35	19.11.75	Nisar Muhammad S/o Bahadar Khan	L.Marwat/4
	211	60/35	10.12.75		Peshawar/2
	212	60/35	18.06.77	Syed Mehmood ul Hassan S/o Syed	Abbottabad/5
	l			Sarwar Shah	
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		59/40	04.10.72	Saeed Ahmad S/o Haji Dilber Khan	Shangla/3
		59/40	10.06.73	Tariq Ahmad S/o Fazli	Dir/3 X
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ļ				Khan	
		59/40	01.04.74	Ulfat Ali S/o Daftar Shah	S.W.Agy/1 Peshawar /2
	225	59/40	01.01.76	Qasim Ali Khan S/o Mumtaz Ali	Pesnawar /2
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i –		59/38	05.04.74	Naveed Ahmad S/o Muhammad	Mansehra/5
				Farid Khan	<u> </u>
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	23	59/35	01.3.72	Moheb ur Rehman S/o Muhammad	N.W.Agy/1
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Ļ			01.01.71	Khan	Mansehra/5
		7 58/45	01.01.74	Nadeem S/o Abdul Qayyum Ghulam Jilani S/o Darwaish	Mansehra /5
-		8 58/38	29.10.65	Rab Nawaz S/o Gul Dad Khan	Abbottabad/5
		9 58/38	15.04.73	Jehan Zeb Ali S/o Fariq Khan	Moh:Agy/1
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$\vdash$		2 58/38	10.09.77	Muhammad Ejaz S/o Mir Sahib Khan	
-		3 58/38	03.01.80	Aqal Wazir S/o Gul Nazir	FR Lakki/1
		4 58/35	07.04.75	Maruf Khan S/o Akhya jan	FR.Bannu/1
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Your obediently (Ilyas Shah) Deputy Secretary-III

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Phone No : 091-9212976 Extension No: 111 Website: www.kppsc.gov.pk

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Assistant Registrar.

KP Information Commission, 7th Floor, Tasneem Plaza, Near Benevolent Fund Building, 6th Saddar Road Peshawar.

Ament

KHYBER PAKHTUNKHWA

2-Fort Road, Peshawar Cantt.

Dated: <u><u>7-1-2019</u></u>

No. PSC/IT/P.I.O/__000209

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PUBLIC SERVICE COMMISSION

### Subject: - <u>COMPLAINT AGAINST NON-SUPPLY OF</u> INFORMATION (COMPLAINT NO:05243)

10

With reference to your letter No.RTIC/AR/1-5243/18/11382-83 dated 05 Nov 2018 on the subject noted above and to state that the Commission has given two (02) marks of M.A Pashto and one (01) mark of M.Ed total three (03) marks have been given an account of additional/higher qualification and no other degree has been claimed.

2. Moreover, the Commission forwarded his application form with his recommendation letter to concerned Department. Furthermore, the complainant may request for his application form from the Elementary & Secondary Education Department.

Your's faithfu

YASIK JAMSHED (Manger Operation IT Branch)

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The Secretary

Khyber Pakhtunkhwa, Public Service Commission Peshawar

Subject: APP

## APPEAL FOR CORRECTION IN THE SENIORITY LIST OF ADEOS

Respected Sir,

Most respectfully it is stated that with reference to my previous appeal through my department, the following facts are hereby submitted for your kind consideration please.

- That according to the letter from your good office No. RTIC/AR/1-5243/18/993-94 Dated 25 Jan 2019, I claimed only on MA but when I obtained my application form through RTI from Directorate of E&SE my MA Pashto as well as MA Pak Studies both were mentioned therein.
- 2. I have been serving in E&SE Department since April 2014 for which I have been given no weightage.
- 3. That at the time of our selection for ADEO Post the commission did not intimated us our seniority but just our recommendation was sent to the department. Whereas the seniority was advertised by the Director E&SE in 2018. Therefore, I appealed to my department for correction. Neither in the recommendation nor in any other intimation, I was informed to appeal within six months. Moreover, the mistake is also not mine.
- . That non correction in the seniority list is a great loss for me.

In view of the above facts it is humbly requested that my appeal may please be accepted on humanitarian basis that I may be given the leftover additional 02 marks on MA Pak Studies and the weightage of my previous service in the E&SE Department.

D. N.C. 3046

Yours Obediently

S/O Taj Muhammad ADEO Establishment Office of the DEO (Male) Peshawar

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Telephone No. 091-9222515



#### KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION 2-FORT ROAD, PESHAWAR CANTT (NEAR GOVERNOR HOUSE)

No.KPK/PSC/Lit/RTI-63/2018

30155 Date: 30111 12018

To,

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Assistant Registrar, Right to Information Commission, 7th Floor, Tasneem Plaza, Near Benevolent Fund Building, 6th Saddar Road, Peshawar Cantt.

Subject: COMPLAINT AGAINST NON-SUPPLY OF INFORMATION COMPLIANT NO. 5243.

Memo,

I am directed to refer to your letter No. KPIC/AR/1-5243/18/11993-95 dated 20.11.2018 the requisite information is hereby enclosed for necessary action please. (Copy attached)

RIZWAN ULLAH PUBLIC INFORMATION OFFICER

Encl as above. Copy to: Inam Ullah AD O/O DEO(F) Peshawar at SDEO town-iv (F) Peshawar.

PUBLIC INFORMATION

OFFICER

## '[KHYBER PAKHTUNKHWA] PUBLIC SERVICE COMMISSION

# **NOTIFICATION** 15th December, 2003.

**Notification No.**  ${}^{2}\underline{\text{KP/PSC}/31550}$ . In exercise of the powers conferred by Section 10(A) of the  ${}^{3}[\text{Khyber Pakhtunkhwa}]$  Public Service Commission (Amendment) Ordinance, 2002 ( ${}^{4}[\text{Khyber Pakhtunkhwa}]$  Ordinance XXVII of 2002), the Commission is pleased to make the following Regulations.

### $\underline{PART - I}$

#### **GENERAL**

- 1. (a) These Regulations may be called the ⁵[Khyber Pakhtunkhwa] Public Service Commission Regulations, 2003.
  - (b) They shall come into force at once.
- 2. In these Regulations, unless the context otherwise requires: -
  - "Attached Department" means the department as defined in the ⁶[Khyber Pakhtunkhwa] Government Rules of Business, 1985.
  - (b) "Appointing Authority" means the officer or authority designated as such in the Service Rules framed by the government for the post.
  - (c) "**Commission**" means the ⁷[Khyber Pakhtunkhwa] Public Service Commission.

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Hayat Hussain

¹ The word "NWFP" substituted with words "KHYBER PAKHTUNKHWA" vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

² The word "NWFP" substituted with word "KP" vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

³ The word "NWFP" substituted with words "Khyber Pakhtunkhwa" vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

⁴ The word "NWFP" substituted with words "KHYBER PAKHTUNKHWA" vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

⁵ The word "NWFP" substituted with words "Khyber Pakhtunkhwa" vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

⁶ The word "NWFP" substituted with words "Khyber Pakhtunkhwa" vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.
⁷ The word "NWFP" substituted with the words "Khyber Pakhtunkhwa" vide the Khyber

The word "NWFP" substituted with the words "Khyber Pakhtunkhwa" vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.



## <u>PART – VII</u>

### MARKING SYSTEM FOR POSTS FILLED ²⁵[BY] OTHER THAN SYLLABUS BASED COMPETIVE EXAIMATIONS.

29. (a) Marking in the case of posts filled other then prescribed syllabus and examination will be made out of 100 marks to be distributed between the academic achievements of the candidates and the interview as follow: -

i)	Academic Record	30 Marks
ii)	Distinction for standing first in Board/ University/ Hifz-ul-Quran	05 Marks
iii)	Additional relevant/ higher qualification	05 Marks
iv)	Experience	10 Marks
v)	Interview	50 Marks

- (b) Minimum passing standard in the interview is 60%. In case experience is not a laid down qualification for any category of posts, the 10 marks allocated for experience shall be added to interview marks.
- (c) Academic scoring in respect of professional posts shall be based on the last three or four professional examinations, as the case may be, on the basis of percentage to 30 marks reserved for academic record and not on division wise basis. For example, if a candidate obtains 2150 marks out of 3650 marks out of a total three or four professional examination his credit will come to 17.67 marks out of 30. So in such cases, the candidate will be entitled to 18 marks.
- (d) In the case of non-professional posts, last three board or university examinations shall be taken into account. In the case of lecturer the marks obtained in Intermediate, Bachelor and Masters Examinations will be taken into account.

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²⁵ The word "BY" inserted vide Notification No. PSC/ Accts/ Regulations/ 2003/ 4539 dated 12.02.2011.

- (e) Decimal fraction of 0.5 and above shall be considered one mark while less than that shall be ignored. To elaborate, a candidate securing 19.5 marks shall be considered to have secured 20 marks.
- (f) In cases where aggregate marks of different boards / universities are at variance conversion of marks shall be made both in the case of aggregate and secured marks of the candidates so as to maintain equity and uniformity in the calculation of overall score of the candidate.
- (g)  26 Deleted.
- (h) In cases where basic qualifications for the post are either intermediate or bachélor degree only last two or three examinations after Matriculation shall be taken into account.
- (i) In cases where the candidate fails to provide the proof of secured marks in a particular examination, he shall be deemed to have passed in parts and with the lowest passing marks.
- (j) Distinction marks shall be allowed only for standing first in a University / Board examination, at the rate of one mark per countable examination. However, the entitlement for the last and final examination shall be two marks. The entitlement of distinction marks shall be further subject to the condition that the examination was passed by obtaining 60% (Grade-B) and above marks²⁷[].
- (k) Five marks reserved for additional qualifications shall be awarded at the rate of one or two marks respectively for every additional relevant Diploma or Degree. In the case of Diploma acquired after the minimum qualification one mark will be awarded while in the case of relevant degree two marks shall be awarded. For Doctorate of Philosophy (Ph.D) and equivalent qualifications, three marks shall be awarded. If the additional qualification is only a repetition of the original qualifications, no additional marks will be given.

*Explanation*. A candidate having MA English from Peshawar University will not be given additional marks for MA English from

Hayat Hussain

²⁶ Clause (g) of Regulation 29 deleted vide Notification No.PSC/ Accts/ Regulations/ 2003/4539 dated 12.02.2011.
²⁷ The words from words fro

²⁷ The words "and was not a supplementary exam" appearing n the ast sentence of Clause (j) of Regulation 29 deleted vide Notification No.PSC/ Accts/ Regulations/ 2003/4539 dated 12.02.2011.

Punjab University. The table below indicating the countable additional relevant qualifications to different subjects shall apply mutatis mutandis.

Subject of	Additional Relevant Subjects
Advertised Post	
Arabic	Islamic Culture / Islamiyat.
Arabic-cum-Islamiyat	Islamic Culture / Islamiyat History
Astronomy	Mathematics, Physics.
Banking	Commerce/Economics/Statistics / ²⁸ [MBA]
Biology	Botany or Zoology, provided the candidate
	holds Master's Degree in both of them.
Botany	Zoology/Biology.
Chemistry	Applied Chemistry / Agriculture Chemistry /
<b></b>	Chemical Engineering / Physical Chemistry.
Civics	History/ Public Administration/ Political
2	Science/ Law ²⁹ / Pakistan Studies.
Commerce	Economics/Banking/Business Administration/
۳.J	Statistics/Mathematics/ M.BA.
Education	Psychology.
General History	Specified Branch of period of History/
Cocorrenter	Political Science ³⁰ /Pakistan Studies.
Geography Home Economics	Geology
Islamiyat	Economics
Islamic Culture	Arabic/ Islamic History/ Islamic Culture.
Islamic History	Islamiyat / Arabic / Islamic History
Islamic Thistory	Any other branch or Period of History / Islamiyat/Islamic Culture.
Law	Political Science/Civics.
Mathematics	
	Statistics / Astronomy / Physics and Applied /Pure Mathematics.
Mirco Biology	Botany/Bio-Chemistry/Zoology.
Persian	Arabic / Urdu
Philosophy	Psychology
Physics	Mathematics, Physical Chemistry
Political Science	Any Branch of History / Public
	Administration/Civics/Law ³¹ /Pakistan Studies.
Psychology	Philosophy

²⁸ The word "MBA" inserted vide Notification No.PSC/ Accts/ Regulations/ 2003/4539 dated 12.02.2011.

Hayat Hussain

²⁹ The words "Pakistan Studies" added against the subject of Civics vide Notification No.PSC/

Accts/ Regulations/ 2003/4539 dated 12.02.2011. ³⁰ The words "Pakistan Studies" added against the subject of General History vide Notification No.PSC/ Accts/ Regulations/ 2003/4539 dated 12.02.2011. ³¹ The words "Pakistan Studies" added against the subject of Political Science vide Notification No.PSC/ Accts/ Regulations/ 2003/4539 dated 12.02.2011.

No.PSC/ Accts/ Regulations/ 2003/4539 dated 12.02.2011.

PushtoPersian/Arabic/Urdu/English.Social WorkSociology/Psychology.SociologySocial Work/psychology.StatisticsMathematicsUrduPersian/Arabic/ Pushto/ English.ZoologyEntomology/Botany/Bio-Chemistry.EnglishArabic./Urdu/Persian / Pushto.

<u>Note:</u> Diploma / Degree not specifically listed above shall be decided by the Commission on the basis of academic relevance.

- (1) Marks for Hifiz-ul-Quran will be awarded ³²[upto five] after having tested the proficiency of the candidate during the interview.
- (m) Experience marks shall be awarded only in those cases where experience forms part of the requisite qualifications. While awarding experience marks, the period of minimum requisite experience shall be deducted and thereafter one mark per year shall be awarded for additional experience upto five years. In case additional experience exceeds the limit of five years then the credit thereafter shall be one mark for two completed years. However, in the case of Teaching / Specialist posts in the medical profession involving experience, one mark per year shall be allowed after the requisite postgraduate qualification. The experience acquired before post-graduation for such category of post, shall count only for the purpose of eligibility.
- (n) The fraction of experience less than one complete year shall be ignored.
- (o) The marks obtained in screening test / ability test shall be counted only for shortlisting purpose.

³² The words "in between two to five" substituted with the words "upto five" vide Notification No.PSC/ Acets/ Regulations/ 2003/4539 dated 12.02.2011.

Hayat Hussain

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26175 failo Jan اَيْدُوكيٹ: _ باركوس/ايسوى ايشن نمبر:__ بپتاور بارایسوسی ایشن، خیبر پختونخواه رابط نمر: 17 471 129 21 23 بعدالت جناب: فتمم محمق تخوار () unerty مجاب: 1 مرد من مش د توکی: علت تمبر: انعام) الله بنام مورخه ũ *:*7 تحانه باعيث تحرير مقدمه مندرجة عنوان بالاميں اپنی طرف ہے واسطے پیروی وجواب دہی کاروائی متعلقہ آن مقام مختسا وم كلي ترمار جال المند العراضال كوديل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدہ کی کل کاروائی کا کامل اختیار ہوگا، نیز دکیل صاحب کو راضي نامه كرنے وتقرر ثالث وفيصله برحلف دينے جواب دعوىٰ اقبال دعوىٰ اور درخواست از ہرشم كى تصديق زریں پردستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیردی یا ڈگری یکطرفہ پا پیل کی برآیدگی اورمنسوخی، نیز دائر كرن ايل نكرانى ونظر ثانى وييروى كرف كامختار موكا اور بصورت ضرورت مقده مذكوره ككل ياجزوى کاردائی کے داسطےاور دکیل یا مختار قانونی کواپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اورصاحب مقرر شده کود به جمله مذکوره با اختیارات حاصل هون گےاوراس کا ساختہ پر داختہ منظور وقبول ہوگا دوران مقدمه میں جوخرچہ ہرجانہ التوائے مقدہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہوتو وکیل صاحب یا بند نہ ہوں گے کہ پیروی مذکورہ کریں، لہٰذا وکالت نامہ کھودیا تا کہ سندر ہے 101 0 9/ 2019 المرقوم: , ú کے لیے منظور ہے مقام ousted نوٺ:اس دکالت نامہ کی نوٹو کا پی نا قابل قبول ہوگی۔

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

# Service Appeal No. 1335/2019

Inam Ullah:.....Appellant

### VERSUS

Government of Khyber Pakhtunkhwa& Others......Respondents

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4.	Copy of Appellant Descriptive Sheet & Experience	"B"	7-8
5.	Copy of Appellant Assessment Sheet	"C"	9
6.	Copy of Appellant representation dated13.10.2016	"D"	10
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Senior Law Officer Khyber Pakhtunkhwa Public Service Commission Peshawar

UMS88921263

25/01/2021

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1335/2019

-Inam Ullah......Appellant

#### $c_{i}$

#### VERSUS

## Government of Khyber Pakhtunkhwa& Others......Respondents JOINT PARAWISE COMMENTSON BEHALF OF (RESPONDENT NO.01 TO 06)

#### RESPECTFULLY SHEWETH: PRELIMINARY OBJECTIONS:

- As per Regulation 37(13) of the Khyber Pakhtunkhwa Public Service Commission repealed Regulation 2003, the request of the appellant is badly time barred, therefore, the instant appeal is liable to be dismissed.
- 2. The principle of estoppel operates against the appellant as the appellant on the basis of such merit order joined the post and working till date.
- 3. The august Supreme Court in C.P No 511-P/2013 titled Zia UI Haq Vs Govt of Khyber Pakhtunkhwa & Others order dated 05.10.2020decided the similar nature question i.e. unclaimed qualification infavour of Khyber Pakhtunkhwa Public Service Commission. Consistency warrants the dismissal of the instant service appeal also.
- 4. That the appellant has got no locus standi or cause of action against the replying respondent.
- 5. That no discrimination / injustice has been done to the appellant. Rather if the relief sought is granted in favour of the appellant it would constitute and tantamount to discrimination against other recommendees including the one likely to be suffered eventually.
- 6. That the instant appeal is not based on facts and is unjustified and an illegal demand against lawful authority of the Commission.
- 7. That the appellant is not substantially aggrieved from any act of Public Service Commission, therefore, instant appeal is not maintainable against respondent Commission.
- 8. That instant appeal is bad in the eyes of law, therefore, not sustainable against the Public Service Commission.

#### ON FACTS:

- 1. Pertains topersonal information of the appellant. Needs no comments.
- 2. That the Khyber Pakhtunkhwa Public Service Commission advertised two hundred forty one (241) posts of Male Assistant District Officers (BPS-16) in Elementary and Secondary

Education Department vide Advertisement No. 05/2009 Serial No. 7 with following

qualification:

<u>QUALIFICATION:</u> (i) B.A/B.Sc 2nd Div with B.Ed and five years teaching / administrative experience in Govt recognized Educational institutions / office. <u>AGE LIMIT:</u> 25 to 35 years. <u>PAY SCALE:</u> BPS-16 <u>ELIGIBILITY:</u> Male <u>ALLOCATION:</u>

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
61	40	40	40	30	30

**Note:** Experience wherever prescribed shall be counted after the minimum qualifications for the post(s), if not specifically provided otherwise against the advertised post(s). **(Annex-A)** 

Correct to the extent of recommendations, however, the appellant in his application form mentioned / claimed M.A (Pashto) & M.Ed Degrees only as higher qualification and was awarded additional marks accordingly. Rest of the para does not pertain to Public Service Commission.

- 3. Does not pertain to Public Service Commission.
- 4-5. Correct to the extent of securing 61/38 marks, however, rest of the para is incorrect. As already stated the appellant in his application form only mentioned / claimed M.A (Pashto) and M.Ed degrees being higher qualification, therefore, three (03) additional marks to the extent of such degrees were awarded to the appellant. Descriptive and assessment sheets (Annex-B & C). The appellant filed an application to the Public Service Commission on 13.10.2016 for additional marks (Annex-D) however, the same being time barred regretted vide reply dated 21.11.2016 (Annex-E). Similarly the appellant made another application dated 15-05-2019 same was replied vide letter dated 11-07-2019, which was also regretted being time barred (Annex-F). It is pertinent to mention here that as per the law prevailing at the relevant time the appellant request was entertainable in specified period only. Regulation 37(13) of the Khyber Pakhtunkhwa Public Service Commission repealed Regulation 2003 is reproduced below for assistance.

"Answer books of candidates will be retained in the office of KP PSC for one year after recommendations against the posts are issued and thereafter these will be destroyed. Similarly, application forms/ copies of documents of non-selected candidates shall also be destroyed after one year of the issuance of recommendations. <u>Any query relating to their answer books or application forms</u> <u>should be made by the candidates within the specified</u> <u>period, thereafter; no request in this regard shall be entertained.</u> However, answer candidates shall also be destroyed after one year of the issuance of recommendations. <u>Any query relating to their answer books or application forms</u> should be made by the candidates within the specified period, thereafter; no request in this regard shall be entertained. However, answer books or applications forms/ copies of documents of candidates wherein a query or an enquiry or a court case is pending shall be kept on record till final disposal of the query/ enquiry/ court case."

(Annex-G)

Moreover, the appellant also filed an application to RTI in response to such the Public Service Commission had clearly mentioned that the appellant had not claimed M.A (Pak Study) therefore, no additional marks could be awarded and further that application form of the appellant had been sent to the concerned department with recommendations (Annex-H). Furthermore, the august Supreme Court in C.P No 511-P/2013 titled as Zia UI Haq on 05.10.2020 held that

> "7.... Looking from this angel, we find that the impugned Judgment suffers from illegality in that it did not give material weight to the fact that the respondent has not at all mentioned about his additional qualification in his application submitted to the KPK Public Service Commission. Had he mentioned about his qualification, his case would have been covered by the latter mentioned judgment.

> **8.** For the forgoing reasons, this petition is converted into appeal and allowed and the impugned judgment is set aside."

#### (Annex-I).

Thus, on the basis of above stated facts and law the appellant request is firstly, badly time barred. Secondly, the M.A (Pak Studies) degree was not mentioned / claimed by the appellant and lastly the principle of estoppel operates against him.

 Incorrect. The appellant may not be allowed to raise grounds to waste the precious time of this Honorable Service Tribunal.

#### GROUNDS.

- A. Incorrect. The appellant could secure 61/38 marks only, therefore, was placed on merit order
   No. 144. Thus, no illegality of violation of rules can be attributed to Public Service Commission.
- B-C. Incorrect. As already explained in para No. 04 & 05 of the facts.
- **D-F.** Incorrect. No fundamental right of the appellant has been violated by the replying respondent rather the law dictates the treatment on merit, thus, was awarded marks that he could secure.

As the appellant is not genuinely aggrieved person, by any act of Khyber Pakhtunkhwa Public Service Commission, may not be allowed to raise further ground against Khyber Pakhtunkhwa Public Service Commission to waste precious time of this Honorable Service Tribunal.

It is, therefore, respectfully prayed that on acceptance of the submissions made herein above, the instant appeal being not maintainable against the replying respondents may kindly be dismissed with costs having no legal footings.

CHIEF SECRETARY KHYBER PAKHTUNKHWA PESHAWAR (RESPONDENT NO. 01)

CHAIRMAN KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION PESHAWAR (RESPONDENT NO.02)

SF

ELEMENTARY & SECONDARY EDUCATION PESHAWAR (RESPONDENT NO.03)

\$ECRETARY KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION PESHAWAR (RESPONDENT NO.05)

DIRECTOR ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR (RESPONDENT NO.04)

DISTRICT OFFICER EXECU/TIVE PESHAWAR (RESPONDENT NO.06)

Stated on oath that the contents of this Para wise comments are true and correct &nothing has been concealed from this Honorable Court.

#### DEPONENT

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CHAIRMAN KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION PESHAWAR





# NWFP PUBLIC SERVICE COMMISSION <u>2- Fort Road Peshawar Cantt:</u> <u>Website: www.nwfppsc.gov.pk</u> Tele: Nos. 091-9214131, 9213563, 9213750, 9212897

#### Dated: 04-06-2009

# Advertisement No. 05 / 2009.

Applications, on prescribed form, are invited for the following posts from Pakistani citizens having domicile of N.W.F.P / F.A.T.A by 04-07-2009 (candidates applying from abroad

**18-07-2009**). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall be rejected without intimation to the candidates

# ELEMENTARY AND SECONDARY EDUCATION DEPTT:

TWO HUNDRED AND FORTY ONE (241) POSTS OF MALE ASSISTANT DISTRICT OFFICERS (BPS-16)

**<u>QUALIFICATION</u>:** (i) B.A/B.Sc 2nd Div with B.Ed and five years teaching / administrative experience in Govt recognized Educational institutions / office.

AGE LIMIT: 25 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Male

#### ALLOCATION:

7.

Marit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5	•
Merit	2/0110-1			30	30	-
61	40	40	40	30		

**Note:** Experience wherever prescribed shall be counted after the minimum qualifications for the post(s), if not specifically provided otherwise against the advertised post(s).

(ATTA-UR-REHMAN) Secretary NWFP Public Service Commission Peshawar

Annek Rustam Khan 8/0 3694 04 04.03.72/37.04.03 EMarwat/4 Abdul Majeed Qualification D.Com(384/750) 563/1100 1989 248/550 1992 ßА Fail Bed 535/1000 2000 ta 1661/2650=18,80= 19 Addl:/Higher Qual: MA Islamiat 2004 Distinction/Hifz: NII Experience:-PST permanent from 01.09.1992 Applied for:-Nil 1724 Inam Ullah S/O 05 21.01.71/38.05.13 Peshawar/2 Jaj Muhammad Qualification FSC 499/1100 -1989 (In Parts) 312/550 1994 12/ ped (539/900) -31 599/1000 1997 3+5+38 61 2 1410/2650=15.96=16 - 1 = 15 M.A (Pashto) 19956 # Ji:/Higher Qual: Med in 2001 / Distinction/Hifz: Nil C.T / PTC Since 26.05.1994 Experience:-Nil Applied for:-Singed by; Checked by; Masood Zaman DS-II Rustam Khan Supdt Amir Ilyas Asstt TAX Luin 21.

# Subject: IExperience for the Rost on Miller Addie

# DATED: 30.04.2010

S.No	Nome of Cardela	I		ي يتو		·
	Name of Candidates	Fromto	T	Y	M	Det
( <b>1</b> - <b>1</b>	Samee Ud Din S/O	25.02.01 To 04.07.2009	Total	08	04	109 *
	Muhammad Nadir Shah		Req	05	00	00
			Ent	03	04	09
2.	Masood Ahmad	3.01.1993 To 04.07.2009	Total	16	05	21:
1.2	S/O Maqbool		Req	05	00	00 //
	Ahmad		Ent	11	05	21
3.	3. Saeed Uz Zaman S/O Muhammad	3.08.2003 To 04.07.2009	Total	05	11	01
Ì			Req	05	00	00
1	Jan `	1.	Ent	00	11	01
4.	Rustam Khan S/O	16.11.2000 To 04.07.2009	Total	08	07	18
	Abdul Majeed		Req	05	00	00
			Ent	03	07	18
5.	Inam-Ullah S/O/	31.03.98 To 04.07.2009	Total	11	03	03
	Tal:Muhammad	1	Req	05	00	00
			Ent .	06	03	03 -

Tri The

"_" Anneze-SIDR MICH ICT ANALYSIST ASSESSMININGALVOIDINESIL List of a Drate although Ekiló), (It) Vacancies: 241 (v) Date: 30.04:2010* (0M)) Illings 0900 hours Candidate's Serial Number. ŧ٢ 9 10 12 S. 8 24 3.3 4 ::: A : 10 6 pari-A (30/20 Marks ) 19 🔬 Academic rating. 16 15 15 15 1 2 Asttional attempts deduction ۱ ÷., 19 15 Total Part-A 15 13 14 Pirt-B 1) Additional relevant Sequalifications / 2 3 3 3 3 05 Marks Higher qualifications 05 Marks (ii) Distinction / Hufiz-ul-Quran 5 3 8 2 . (iii) Experience 10 Marks 5 g STOtal-B - I-C F F 38 30 50 / 60 Marks Viva-Voce Test 49 61 GRAND TOTAL [Part A + B + C] Member

The Secretary, Khyber Pakhtunkhwa, Public Service Commission.

13 OCT 2016 IARY NO

APPLICATION FOR ADDITIONAL MARKS ON THE BASIS OF EXTRA MA

Annen

Most respectfully it is stated that I was selected as ADO in Elementary and ondary Education department by PCS in 2011 but according to the seniority list recently agated by Elementary and Secondary Education department, I have been deprived of the linnal marks on the basis of my extra M.A degrees which causes me a great loss.

In view of the above facts it is requested that I may please be given the additional on the basis my extra M.A degrees (copies attached).

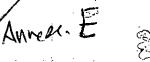
Thanking in anticipation

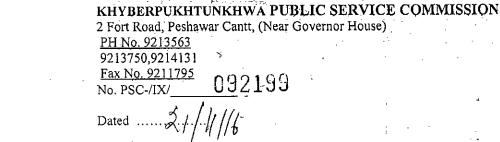
Your obediently يتح ا

Inam Ullah s/o Taj Muhammad Village & P.O Gulozai Tehseil District Peshawar



092199





То

Mr. Inam Ullah s/o Taj Muhammad Village & P.O Gulozai Tehsil District Peshawar.

Subject: Application for additional marks on the basis of extra M.A Degree.

Memo,

With reference to your application dated 13.10.2016 on the cited subject above and to state that no query /request relating to application form/ documents shall be entertained after the six months of the issuance of the recommendation as per our regulation. Therefore, your request can not be entertained after a lapse of six years.

Your's Faithfully (Fazal Ø Assistant Director -IH ZUINS

The Secretary

Khyber Pakhtunkhwa, Public Service Commission Peshawar

Subject:

#### APPEAL FOR CORRECTION IN THE SENIORITY LIST OF ADEOS

Respected Sir,

Most respectfully it is stated that with reference to my previous appeal through my department, the following facts are hereby submitted for your kind consideration please.

- 1. That according to the letter from your good office No. RTIC/AR/1-5243/18/993-94 Dated 25 Jan 2019, I claimed only on MA but when I obtained my application form through RTI from Directorate of E&SE my MA Pashto as well as MA Pak Studies both were mentioned therein.
- 2. I have been serving in E&SE Department since April 2014 for which I have been given no weightage.
- 3. That at the time of our selection for ADEO Post the commission did not intimated us our seniority but just our recommendation was sent to the department. Whereas the seniority was advertised by the Director E&SE in 2018. Therefore, I appealed to my department for correction. Neither in the recommendation nor in any other intimation, I was informed to appeal within six months. Moreover, the mistake is also not mine.
- 4. That non correction in the seniority list is a great loss for me.

In view of the above facts it is humbly requested that my appeal may please be accepted on humanitarian basis that I may be given the leftover additional 02 marks on MA Pak Studies and the weightage of my previous service in the E&SE Department.

t: Director ESSE kingber pakhtunkhur Jeshowan

Yours Obediently

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Ap 3.

Inam Ullah

S/O Taj Muhammad

ADEO Establishment

Office of the DEO (Male) Peshawar



To

KHYBERPUKHTUNKHWA PUBLIC SERVICE COMMISSION

2 Fort Road, Peshawar Cantt, (Near Governor House)

PH No. 9213563 9213750,9214131 Fax No. 9211795

014487 - 89 11-7-2019



Mr. Inam Ullah s/o Taj Muhammad ADEO Establishment Office of the DEO(Male) Peshawar.

Subject:Application for correction in the seniority list of ADEOsMemo:

Kindly refer to your appeal dated 5.5.219 on the subject noted above it is to inform you that your request has been examined by the commission and regrets in ability to accede being time barred. Moreover, the Commission has already replied earlier vide letter no. PSC/SR/IX092199 dated 21.11.2016 (copy enclosed).

Your's Faithfully

(Masroof Gul) Assistant Director –III

Copy to:

1. Secretary, Elementary & Secondary Education, Department, KPK.

2. Director Elementary & Secondary Education.

(Masroof Gul) Assistant Director -III 67LZ

#### ¹[Khyber Pakhtunkhwa] PUBLIC SERVICE COMMISSION

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#### NOTIFICATION

15th December, 2003.

**Notification No.** ²[Khyber Pakhtunkhwa]/PSC/31550. In exercise of the powers conferred by Section 10(A) of the ³[Khyber Pakhtunkhwa] Public Service Commission (Amendment) Ordinance, 2002 (⁴[Khyber Pakhtunkhwa] Ordinance XXVII of 2002), the Commission is pleased to make the following Regulations.

#### <u>PART – I</u> <u>GENERAL</u>

- 1. (a) These Regulations may be called the ⁵[Khyber Pakhtunkhwa] Public Service Commission Regulations, 2003.
  - (b) They shall come into force at once.
- In these Regulations, unless the context otherwise requires: -
  - (a) **"Attached Department**" means the department as defined in the ⁶[Khyber Pakhtunkhwa] Government Rules of Business, 1985.
  - (b) **"Appointing Authority**" means the officer or authority designated as such in the Service Rules framed by the government for the post.
  - (c) "**Commission**" means the ⁷[Khyber Pakhtunkhwa] Public Service Commission.
  - (d) "Member" means the Member of the Commission and includes the Chairman.
  - (e) **"Department**" means a department as defined in the ⁸[Khyber Pakhtunkhwa] Government Rules of Business, 1985.
  - (f) **"Departmental Representative**" means the senior officer of the department of the government to which post/s relates and who assists the Committee / Panel of the Commission for conducting the viva-voce / interview.
  - (g) **"Subject Specialist**" means the advisor called for interview by the Commission from the University / Colleges / Institutions / Autonomous Bodies / Retired Officer directly or through the Head of Department.
  - (h) "Government" means the Government of ⁹[Khyber Pakhtunkhwa]
  - (i) **"Committee**" means the Committee of one or more Members constituted by the Chairman for any specific task.

¹ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

² Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

³ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

⁴ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

⁵ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

⁶ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

⁷ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

⁸ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

⁹ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

(2) Where the experience forms part of the requisite qualifications, the recommendation of inservice candidates shall be conveyed provisionally subject to perusal of their ACRs by the Commission and finding these satisfactory.

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- (3) (a) Where a large number of subjects / specialties are included in an advertisement, recommendations may not be pended till the finalization of the entire batch but instead zonal allocation be worked out subject-wise and recommendation conveyed to the Department without indicating to them the zonal allocation and the inter-se-seniority. In recommendations to the Department it shall be made clear that the inter-se-seniority of the recommendee is linked with other subjects and the overall merit position and zonal adjustment will be intimated on the completion of interviews in all subjects. The chronological order of the recommendees shall not confer any right of seniority.
- (b) The combined merit list shall be against a particular advertisement where the posts were advertised collectively but recommendations were staggered due to interview schedule or any other reason.

#### <u>PART – XII</u>

#### 36. PANEL OF EXAMINERS / CONDUCT OF COMPETITIVE EXAMINATION.

- (1). The Commission shall maintain a panel of approved Examiners for various written examinations. The panel shall be reviewed periodically by the Chairman to ensure that a sufficient number of competent Examiners are available on the panel.
- (2). The Examiners for various examinations shall be appointed from the approved panel by the Chairman / Members authorized by the Commission in this behalf. As far as possible the answer sheets will be evaluated by the examiners who had prepared the question papers. In case the appointed examiner is unable to mark the papers for certain reasons then the ⁴³[Chairman] in its discretion may appoint another examiner from the approved panel.
- (3). There shall be no rechecking, reevaluation and reappraisal of the awarded marks and score once given on the answer sheet by the examiner shall be final. However, where some answer is left unmarked or an arithmetical mistake made by the examiner is noticed, necessary rectification of the mistake shall be made by the same examiner.

#### 37. CONDUCT OF COMPETITIVE EXAMINATIONS.

- (1). The Director Examinations shall be the overall incharge of the examinations including appointment of the supervisory staff for different examinations and shall ensure that the examinations are conducted in accordance with the laid down instructions of the Commission.
- (2). A Member or an Officer of the Commission shall be designated as incharge of an examination center / centers. He shall be issued brass seals for each center for sealing the canvas bags in which the scripts are placed.
- (3). The brass seals shall be delivered to the examination center under the supervision of the Member / Officer. At the end of examination, these will be promptly collected. If there are two papers in a day, the scripts of the morning papers must be sealed immediately at the end of the examination. After completion of the After Noon's paper, the canvas bags shall be sealed and the scripts delivered to the Director of Examination or his representative.

The word "Commission" replaced by the word "Chairman" vide Notification No.PSC/ PA/ Reg/02 dated 31.01.2004.

(4). The seals shall remain in the custody of the Member / Officer incharge till the scripts are dispatched to the examiners concerned.

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- (5). The canvas sealed packets / bags shall be opened by the Chairman or Member Incharge. These will be embossed in his presence and the fictitious numbers marked on the scripts. The roll number slips duly marked with the fictitious numbers shall be placed in an envelope and sealed. The sealed envelope shall be delivered to the Chairman, and the answer book handed over to the Registrar Examinations.
- (6). The Registrar Examinations shall be responsible for checking and transmission of the scripts to the Examiners.
- (7) The Registrar Examination shall deliver the sealed question papers to the Member / Officer Incharge of the center. The Member / Officer Incharge shall arrange delivery of the sealed question papers to the examination centers under his own supervision.
- (8). During the examination, the Member / Officer incharge shall arrange to get the scripts sealed with his special rubber stamp. If the number of centers are such that stamps cannot be affixed in every center it may be done as is possible. It may be ensured that in a center which is selected for this purpose scripts of all the examinees be stamped as far as possible.
- (9). The respective representatives of the Commission appointed in various examination halls shall be responsible to deliver the sealed canvas bags to the Director Examination or his representatives if the Examination is held locally. In the case of outstation examination, the sealed bags shall be handed over to the concerned Member/ Officer who may deliver the same to the Examination Section on his return.
- (10). The Director Examination shall maintain a complete record of each paper on Form PSC.23.
- (11). Ordinarily there shall be no change of Examination Centre. However, in order to avoid hardship the Chairman may authorize change of centre in exceptional cases.
- (12). Where candidate suffers from a disability which renders him / her unable to write, may apply to the Commission duly supported with the disability certificate before the written examination for the arrangement of an amanuensis. The Commission shall provide the amanuensis from the office who shall be of lower grade of education than the candidate.
- (13). Answer books of candidates will be retained in the office of KP PSC for one year after recommendations against the posts are issued and thereafter these will be destroyed. Similarly, application forms/ copies of documents of non-selected candidates shall also be destroyed after one year of the issuance of recommendations. Any query relating to their answer books or application forms should be made by the candidates within the specified period, thereafter, no request in this regard shall be entertained. However, answer books or applications forms/ copies of documents of candidates wherein a query or an enquiry or a court case is pending shall be kept on record till final disposal of the query/ enquiry/ court case.⁴⁴

#### <u>PART – XIII</u>

#### 38. RULES OF PROCEDURE

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(1). The decisions of the Commission shall be by a majority of votes of the Members present and in the case of tie, the Chairman shall have, a second or casting vote.

52/2003/24561-72

Clause (13) in Regulation 37 is substituted vide Notification No. KPSC/B&Adated 12.03.2014

Phone No : 091-9212976 Extension No: 111 Website : <u>www.kppsc.gov.pk</u>



KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION 2-Fort Road, Peshawar Cantt. No. PSC/IT/P.I.O/ 000209

Dated: <u>3-1-2019</u>

Annexett

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Assistant Registrar, KP Information Commission, 7th Floor, Tasneem Plaza, Near Benevolent Fund Building, 6th Saddar Road Peshawar.

## Subject: - COMPLAINT AGAINST NON-SUPPLY OF INFORMATION (COMPLAINT NO:05243)

With reference to your letter No.RTIC/AR/1-5243/18/11382-83 dated 05 Nov 2018 on the subject noted above and to state that the Commission has given two (02) marks of M.A Pashto and one (01) mark of M.Ed total three (03) marks have been given an account of additional/higher qualification and no other degree has been claimed.

2. Moreover, the Commission forwarded his application form with his recommendation letter to concerned Department. Furthermore, the complainant may request for his application form from the Elementary & Secondary Education Department.

Your's faithfully.

YASIR JAMSHED (Manger Operation IT Branch)

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### IN THE SUPREME COURT OF PAKISTAN (APPELLATE JURISDICTION)

#### PRESENT: MR. JUSTICE QULZAR AHMED, HCJ MR. JUSTICE FAISAL ARAB MR. JUSTICE JAZ UL AFISAN

CIVIL PIETITION NO. 511-P OF 2013 (On append against, the sjudgment, dated 12.00.2013 passed by Peshawar, High Court, Peshawar in Writ Petition No. 3647/2010)

Covernment of KPK through Chief Secretary, Peshawar elc.

#### ...Peutioner(s)

#### VERSUS

Zia ul Hug and others

For the Petitloner(s):

....Respondent(s)

Barrister Qasim Wadood, Addl. A.G. KEK Mr. Hamld Saleem, Law Officer, PSC KP Mr. Mehtab Gul, Law Officer, PSC KP

For the Respondents:

Mr. Zia ur Rohman Pajik, ASC Bor respondent No. 1)

NCMO [For respondent Nos. 2-5]

Date of hearing:

05.10,2020

## ORDER

<u>OUTZAR AHMED C.C.F.</u> An advertisement was published on 22.04/2009 for making appointment of District Public Prosecutor (BS-1.7): Respondent No. 1 (the respondent) applied for the said post. Test and interview was held but his name was not shown in the merit fist. The respondent filed writ petition in the Peshawar High Court, Peshawar and through the impugned judgment dated 12,06,2013 the petitioners were directed to give two additional marks to the respondent for his additional qualification and thereafter to prepare the merit list.

2. Learned Additional Advocate General has contended



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respondent had the respondent declared his additional qualification in his application for the said post. However, the respondent did not declare his additional qualification and; therefore, the additional marks were not granted to him.

3. On the other hand, learned counsel for the respondent contends that the respondent had additional gualification of M.A. Political Science but he did not mention such additional qualification in his application for the reason that he did not had in his hand the degree. He further contends that subsequently the respondent obtained the marks sheet as well as the degree of MA Political Science and filed the same in the Public Service Commission for considering him for being appointed to the post he has applied. Learned counsel in support of his submissions has relied upon the judgments of this Court reported as <u>Habibur</u> <u>Rehman Vs. Government of Pakistan</u> (1979 SCMR 121) and Jahanzaib Malik Vs. Balochistan Public Procurement Regulatory. Authority (2018 SCMR 414).

4. It is admitted fact that the respondent did not at all disclose his additional qualification in his application, which he submitted before the Public Service Commission for being appointed as District Public Prosecutor (BS-17). It is the claim of the respondent that he filed the result as well as the degree of his additional qualification of MA Political Science with the Public Service Commission in November, 2009, Learned counsel, however, has failed to point out any document which may show that the respondent has submitted the documents of his additional qualification in the Public Service Commission.

5. In any case, we note that the respondent's markssheet, which he has filed with CMA No. 908-P/2020 at page 18,

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CIVIL PICTITION NO. 511-P OF 2013

shows that the respondent has appeared in Master of Arts in Political Science Final Annual Examination 2006. It also shows that it was issued on 29.08.2009. However, the photo copy of the degree which is at page 13 of the said CMA shows that respondent has appeared in the annual examination of 2006 and obtained Master in Arts degree in Political Science and such degree was issued to the respondent on 30.08.2009.

б. We are not at all satisfied with the reply of the learned counsel for the respondent for the reason that way back in the examination of 2006, he is said to have passed MA Political Science but when he put up the application against the advertisement, he did not mention his additional qualification of MA Political Science. No reason has been given by the learned counsel for the respondent as to why the respondent did not mention his additional qualification except that the respondent did not possess the documents of his additional qualification, Where the factum of additional qualification was known to the respondent, he ought to have mentioned the same in his application form submitted to the KP Public Service Commission but he did not and came up with this additional qualification when the process of appointment was on the verge of completion, in our view, the KP Public Service Commission was justified in not showing the name of the respondent on the merit list for which respondent himself is to be blamed and no one else.

7. The two judgments referred above by the learned counsel for the respondents are distinguishable from the facts and circumstances of the present case for the reason that one is in respect of domicile and in the other the candidate had declared his qualification while applying for the post and merchy on obtaining

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the degree subsequently, the Court held that he will not be debarred from being considered for appointment. The present case where the respondent himself did not at all mention about his additional qualification in the application, he cannot be allowed to take up the plea that he got copy of the marks-sheet and degree subsequently and thus was entitled to grant of additional marks. Looking from this angel, we find that the impugned judgment suffers from illegality in that it did not give material weight to the fact that the respondent has not at all mentioned about his additional qualification in his application submitted to the KPK Public Service Commission. Had he mentioned about his qualification, his case would have been covered by the latter mentioned judgment.

8. For the forgoing reasons, this petition is converted into appeal and allowed and the impugned judgment is set aside.

#### CMA No. 730-P/2013

9. Since, the main petition has been converted into appeal and allowed, this CMA has become infructous and is



Peshawar, the 5th of October, 2020 Not Annroved For Reporting 8d- Gulzar Ahmod, IICJ 8d- Falsal Amb, J 8d- Yaz ul Ahsan, J

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