

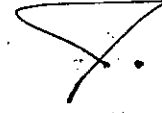
18.05.2023

Junior of learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

File to come up alongwith connected Service Appeal No. 1615/2019 on 09.08.2023 before D.B. Parcha Peshi given to the parties.



(Muhammad Akbar Khan)
Member (E)



(Salah-ud-Din)
Member (J)

kamranullah

09.08.2023

1. Learned counsel for the appellant present. Mr. Asif Masood Ali Shah learned Deputy District Attorney alongwith Faheem Khan, Assistant for the respondents present.

2. Learned counsel for the appellant requested for adjournment in order to prepare the brief. Adjourned. To come up for arguments on 05.12.2023 before D.B. P.P given to parties.



(Fareeha Paul)
Member (E)



(Rashida Bano)
Member (J)

*KaleemUllah

SCANNED
K.P.S.T
Peshawar

SCANNED
K.P.S.T
Peshawar

S.A No. 1620/2019

17.02.2023

Mr. Noor Muhammad Khattak, Advocate for the appellant present and submitted fresh Wakalatnama which is placed on file. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General alongwith Mr. Muhammad Tufail, Assistant for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has been freshly engaged and has not made preparation for arguments. Adjourned. To come up for arguments on 02.03.2023 before the D.B.

(Fareeha Paul)
Member(I)

(Salah-ud-Din)
Member (J)

2nd Mar, 2023

Junior of learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for respondents present.

Junior to learned counsel for the appellant seeks adjournment on the ground that learned senior counsel is not available. Adjourned. To come up for arguments on 18.05.2023 before DB. PP given to the parties.

(Rozina Rehman)
Member (Judicial)

(Kalim Arshad Khan)
Chairman

SCANNED
KPST
Peshawar

27.09.2022

Junior to counsel for appellant present.

Muhammad Riaz Khan Paindakheil learned Assistant Advocate General alongwith Bahraman ADEO and Muhammad Tufail Assistant for respondents present.

File to come up alongwith connected Service Appeal No.1615/2019 titled "Hussain Rehman Vs. Education Department" on 01.12.2022 before D.B.



(Fareeha Paul)
Member (E)



(Rozina Rehman)
Member (J)

01.12.2022

Junior to counsel for the appellant present.

Muhammad Adeel Butt learned Additional Advocate General alongwith Behrmand Khan Deputy Director for respondents present.

File to come up alongwith connected Service Appeal No.1615/19 titled "Hussain Rehman Vs Education Department" on 17.02.2023 before D.B.



(Fareeha Paul)
Member (E)



(Rozina Rehman)
Member (J)

SCANNED
KPST
Peshawar

14.04.2022

Appellant alongwith his counsel present. Mr. Naseer-Ud-Din Shah, Assistant Advocate General for the respondents present.

On 20.12.2021, my learned predecessor, while recording order sheet, observed that the respondents were afforded last opportunity for submission of written reply/comments, but they did not submit the same even till 20.12.2021. Another last opportunity was given to them to submit written reply/comments subject to cost of Rs.2000/- but again there is no written reply/comments filed by them. Vide even order it was also held that the right of reply/comments of the respondents shall be deemed as struck off in view of the above order. To come up for arguments before the D.B on 19.05.2022.

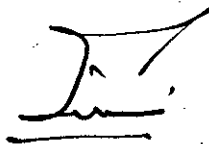


Chairman

19.05.2022

Clerk of learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Learned Member (Judicial) Ms. Rozina Rehman is on leave, therefore, arguments could not be heard. Adjourned. To come up for arguments on 21.07.2022 before the D.B.



(Salah-ud-Din)
Member (Judicial)

21.07.2022


Junior to counsel for appellant present.

Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General for respondents present.

File to come up alongwith connected Service Appeal No.1615/2019 titled "Hussain Rehman Vs. Government of Khyber Pakhtunkhwa" on 27.09.2022 before D.B.



(Fareeha Paul)
Member(E)




(Rozina Rehman)
Member (J)

20.12.2021

Counsel for the appellant and Mr. Muhammad Muhammad Adeel Butt, Addl. AG for the respondents present.

The respondents were afforded with last opportunity for submission of written reply/comments but even today they have not submitted reply/comments and seek adjournment through learned AAG. Let the respondents be afforded with another last chance subject to cost of Rs. 2000/- on or before next date with the warning that in case they fail to submit the written reply/comments and cost, their right for reply/comments shall be deemed as struck off by virtue of this order. Case to come up for arguments on 22.02.2022 before the D.B.


Chairman

22.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 14.04.2022 for the same as before.


Reader

30-12-2020

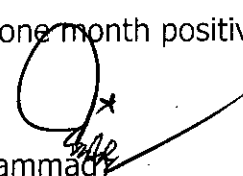
Due to summer vacation, case is adjourned to 17-03-2021 for the same as before.


Reader

17.03.2021

Counsel for the appellant and Addl. AG for the respondents present.

On 13.08.2020, the proceedings were adjourned for arguments, however, on subsequent two occasions, the matter was adjourned on the strength of Reader's Note. Learned AAG requests for time to furnish the reply/comments due to the said reason. Adjourned to 19.05.2021. On the next date arguments on the appeal shall be addressed while the respondents shall furnish the reply within one month positively.


(Mian Muhammad)
Member (E)


Chairman

19.5.21


due to COVID 19, the case is adjourned to 10.9.21, for the same.



Reader

10.09.2021

Clerk of counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Clerk of counsel for the appellant stated that learned counsel for the appellant is unable to attend the Tribunal today due to strike of Lawyers. Adjourned To come up for arguments before the D.B. on 20.12.2021.


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


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

28.10.2020

Proper D.B is on Tour, therefore, the case is
adjourned for the same on 30.12.2020 before D.B.


Reader

13.04.2020


Due to public holiday on account of COVID-19, the case is adjourned to 07.07.2020 for the same. To come up for the same as before S.B.


Reader

07.07.2020

Counsel for the appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate General for the respondents present and seeks time to submit comments. Last chance is given for submission of reply as well as for reply to application for suspension of notification, on 13.08.2020 before S.B



Member (J)

13.08.2020

Counsel for the appellant present. Nemo for the respondents.

Despite last opportunity, the respondents have not furnished the requisite reply/comments. The matter is, therefore, posted to D.B for arguments on 28.10.2020.



Chairman

03.01.2020

Appellant present in person.

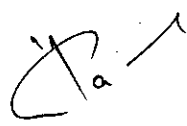
On the strength of admitting note dated 04.12.2019 handed down in Service Appeal No. 1058/2019, instant appeal is admitted to regular hearing subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 27.01.2020 before S.B.

13/1/20
Appellant Deposited
Security & Process Fee


Chairman

27.01.2020

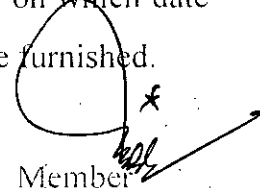
Clerk to counsel for the appellant present. Written reply not submitted. Irfan Assistant representative of the respondent department present and seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 04.03.2020 before S.B.


Member

04.03.2020

Junior to counsel for the appellant and Addl. AG for the respondents present

Learned AAG seeks time to contact the respondents and submit written reply. Adjourned to 13.04.2020 on which date the requisite reply/comments shall positively be furnished.

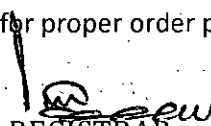
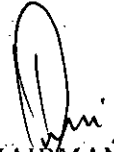

Member

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1624/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	03/12/2019	<p>The appeal of Mr. Arshad Ali resubmitted today by Mr. Saadatullah Khan Tangi Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 3/12/19</p>
2-	04/12/19.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>03/01/20</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Muzaffar Said SST GHS Kher Abad Dir Lower received today i.e. on 29.07.2019 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got singed by the appellatant.
- 2- Affidavit may be got attested by the Oath Commissioner.
- 3- Annexures of the appeal may be attested.
- ④ Copy of departmental appeal in respect of appellatant is not attached with the appeal which may be placed on it.
- ⑤ Copy of Writ Petition in respect of appellatant mentioned in para-7 of the memo of appeal is not attached with the appeal which may be placed on it.
- 6- Necessary party may be made in the heading of the appeal.


No. 1348 /S.T,

Dt. 31-7-2019.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Saadatullah Khan Tangi Adv. Pesh.

Re-Submitted after completion


17/8/19

Objection no.4 and 5 are still stand therefore, the appeal in hand is returned again to the counsel for the appellatant for completion and resubmission within 15 days.

No. 1486 /S.T,

Dt. 23/82019.


REGISTRAR

Mr.Saadatullah Khan Adv. Pesh.

Six, D-A is at Page 35.

Re-submitted after completion

the same may kindly be checked with

Case title as Chulam Abbas vs Govt

fixed for 30.9.19. W.P. was filed by
other colleagues of Petitioner.

18.9.19

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. 1619 /2019

Muzaffar Said.....Appellant

Versus

Govt. of KP through Secretary Elementary & Secondary
Education, Peshawar.....Respondent

INDEX

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3.	Addresses of parties		7
4.	Copy of Appointment Letter	A	8-25
5.	Copy of Notification dt.24.07.2014	B	26-31
6.	Copy of minutes of the meeting	C	32-34
7.	Copies of departmental Appeal and Writ Petition	D & E	35-41
8.	Wakalatnama		42

Through Appellant


Saadat Ullah Khan Tangi
Advocate High Court
Cell No.0331-5030566

Dated 18.07.2019

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____/2019

Muzaffar Said S/o Hazrat Yousaf,
Appointed as SST, GHS Kher Abad,
District Lower Dir.....**Appellant**

Versus

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar
2. Govt. of Khyber Pakhtunkhwa through Chief Secretary Civil Secretariat, KPK Peshawar
3. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

.....**Respondents**

Service Appeal U/S 4 of the Service Tribunal Act, 1974 against the non consideration of the appellant for promotion to the post of SS(IT) in line with the Notification No.SO (PE)4-5/ SSRC/ meeting/ 2012/teaching Cadre dated 24.07.2014 published in official gazette and the same notification be also inserted in service rules 2019 and the appellant be considered for promotion to the post of SS(IT) on the basis of having master degree in Computer Science and having at least five year service as S.S.T (General/Science)

Respectfully Sheweth:

The appellant humbly submits as under:

1. That the appellant having qualification of B.ED, Master in computer Science was appointed as S.S.T, BPS-16 vide order dated 01.11.2014. (Copy of appointment letter is Annexure "A").
2. That since his appointment till date the appellant is performing his duty to the best of his ability and has not given any chance to displeasure of his superiors.
3. That previously in the rules pertaining to the year 2014 the category of appellant i.e. Master in Computer Science was made eligible for promotion to the post of S.S BPS-17. (Copy of Notification dated 24.07.2014 is annexure "B").
4. That later on meeting of respondent was held on 10.08.2017 in which SSTs (General /Science) having M.Sc (Computer Science)/BS (Computer Science)/MIT may be given 50% quota for promotion to the post of SS(IT) B-17. (Copy of minutes of the meeting is annexure "C").

5. That the respondent in utter violation of the notification, and minutes of the meeting as aforesaid is making promotions from SSTs (General/Science) but to utter violation are not considering the appellant for the promotion to the post of S.S(IT).
6. That the respondent is bent upon not to insert the above mentioned notification in the Rules and thereby depriving the appellant from the promotion to the post of SS(IT).
7. That the appellant after exhausting departmental remedies knocked at the doors of august High Court for the redressal of his grievance but the Hon'ble High Court dismissed the Writ Petition for being non maintainable and directed the appellant to approach competent forum for redressal of his grievances. (Copies of departmental Appeal and W.P is Annexure "D" & "E" respectively).
8. That the appellant prefer the instant Appeal on the following grounds inter alia

GROUND'S:

- A. That the non-considering of the appellant for promotion to the post of SS(IT) despite having requisite qualification of M.Sc Computer Science is in clear violation of Notification dated 24.07.2014 and minutes of the meeting dated 10.08.2017.
- B. That the non-insertion of the category of M.Sc Computer Science for the purpose of promotion to the post of SS(IT) is also violative of notification and minutes of the meeting mentioned above.
- C. That the appellant is quite eligible for promotion to the post of SS(IT) according to aforesaid minutes and Notification but the respondents is bent upon to deprive the appellant from his legal rights of promotion to the post of SS(IT).
- D. That the respondent is under legal obligation to act in accordance with law.
- E. That career progress is the right of every individual under the constitution of Pakistan.
- F. That the appellant reserves the right to agitate other additional grounds at the time of hearing.

It is, therefore prayed that on acceptance of the instant appeal non-considering of appellant for to the post of SS(IT) BPS-17 may kindly be declared as illegal, without lawful authority and notification mentioned above dated 24.07.2014 be also inserted in service rules 2019 and the appellant be considered for promotion to the post of SS(IT) BPS-17 on the basis of his Master Degree in Computer Science.

Through

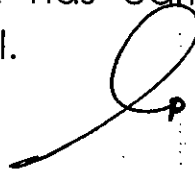
Appellant


Saadat Ullah Khan Tangi
Advocate High Court

Dated 18.07.2019

CERTIFICATE

No such like appeal has earlier been preferred before this Hon'ble Tribunal.



BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____/2019

Muzaffar Said.....**Appellant**

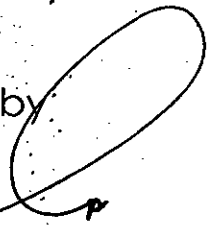
Versus

Govt. of KP through Secretary Elementary & Secondary
 Education, Peshawar.....**Respondent**

AFFIDAVIT

I, Muzaffar Said S/o Hazrat Yousaf, Appointed as
 SST, GHS Kher Abad, District Lower Dir, do hereby
 solemnly affirm and declare on oath that the contents
 of the accompanying **Service Appeal** are true and
 correct to the best of my knowledge and belief and
 nothing has been concealed from this Hon'ble Court.

Identified by



Saadat Ullah Khan Tangi
 Advocate High Court

DEPONENT

CNIC#:

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____/2019

Muzaffar Said.....**Appellant**

Versus

Govt. of KP through Secretary Elementary & Secondary
Education, Peshawar.....**Respondent**

ADDRESSES OF PARTIES

APPELLANT:

Muzaffar Said S/o Hazrat Yousaf,
Appointed as SST, GHS Kher Abad,
District Lower Dir

RESPONDENTS:

1. Govt. of Khyber Pakhtunkhwa through Secretary
Elementary & Secondary Education, Peshawar
2. Govt. of Khyber Pakhtunkhwa through Chief
Secretary Civil Secretariat, KPK Peshawar
3. Director Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Through

Appellant


Saadat Ullah Khan Tangi
Advocate High Court

Dated 18.07.2019



Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936, 0800-33857
E-mail refiq_kk851@yahoo.com

S.S.F

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 27th July, 2013, the following: SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Quasis/Quasis, PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General), noted against each BPS-16 (Rs.10000-300-3-1000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted by the District Education Officer concerned on "School based".

A. SST (Bio-Chem)

I. PROMOTION OF SCT/CT TO THE POST OF SST (BIO-CHEM) BPS-16

Total No. of SST Bio-Chem (M) Posts vacant Posts	39
25% share initial recruitment	10
75% share for Promotion.	29
40 % Share of promotion of SCT/CT	16
Posts available for promotion	16
Promoted through this order	17

S.No	S.I.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	112	Habibur Rahman	GHS Shontala	07/04/1969	Services placed at disposal of DEO (SI) Dir Lower for further posting against SST (Bio-Chem) post on school based
2	117	Sher Mohammad	GHS Bahadur	17/01/1969	do
3	125	Bakht Ali	GHS Bagh Dushkhet	09/04/1965	do
4	137	Khan Badshah	GHSS Lal Qila	24/04/1967	do
5	139	Habibur Rahman	GMS Shontala	15/06/1972	do
6	151	Shuaibur Rahman	GHSS Khatt	20/03/1969	do
7	263	KHAISTA RAHMAN	GHS GUMBAT BANDA	15/01/1972	do
8	264	Israr Ahmad	GHSS Munda	02/03/1971	do
9	281	Gul Wahid	GMS Bambalal	15/01/1965	do
10	295	Sikandar Ali	GHS Sangwalai	05/07/1970	do
11	303	Mohammad Israr	GMS Ajoa Talash	01/12/1970	do
12	313	Badshahuddin	GHSS Sedda	25/11/1971	do
13	441	Hamad	GCMHS Timergara	13/04/1975	do
14	449	Nasrullah	GHS Osakai	02/02/1979	do
15	495	Mohammad Zia Ul'Amin	GMS Utala	22/10/1977	do

Intikhab Photo State

Near National Bank Colony,
Balambhat Chowk, Timergara.
Ph: 0945-822994, Mob: 0300-9398707.

PROMOTION OF PSHT/SPST/PST TO THE POST OF SST (Bio-Chem) BPS-16

Total No. of SST Bio-Chem (M) Posts vacant Posts	39
25% share initial recruitment	10
75% share for Promotion.	29
40% Share of promotion of PSHT/SPST/PST	08
Posts available for promotion	08
Promoted through this order	08

S.No	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	1018	Rahmani Gul	GPS Hundak	15/08/1969	Services placed at the disposal of DEO (M) Dir Lower for further posting against SST (Bio-Chem) post on school based.
2	1030	Zarbaz Khan	GPS Takwara	03/01/1970	-----do-----
3	1261	Gulab Rehman	GPS Khona Picket	05/03/1971	-----do-----
4	1105	Muzafar Khan	GPS Zindara	16/03/1970	-----do-----
5	1109	Said Bashir Ahmad	GPS Hisarak Bala	12/03/1971	-----do-----
6	1580	Asghar Khan	GPS Qandaray	02/04/1975	-----do-----
7	1674	Hanif Ullah	GPS Shakar Tangai	20/12/1969	-----do-----
8	1714	Latif Ullah	GPS Raba	20/12/1977	-----do-----

15
8
23
19

B. SST (Phy-Maths)

PROMOTION OF SCT/CT TO THE POST OF SST (Phy-Maths) BPS-16

Total No. of SST Phy-Maths (M) Posts vacant Posts	43
25% share initial recruitment	10
75% share for Promotion.	33
40% Share of promotion of SCT/CT	17
Posts available for promotion	17
Promoted through this order	15

S.No	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	155	Alimud Dacha	GHS Munjai	12/07/1969	Services placed at the disposal of DEO (M) Dir Lower for further posting against SST (Phy-Maths) post on school based.
2	160	Falek Naz	GHS Shawa	01/04/1967	-----do-----
3	183	Jehan Bahadar	GHS Maidan Bandai	08/04/1971	-----do-----
4	185	Mohammad Iqbal	GHS Toor Mang	01/03/1968	-----do-----
5	187	Sarzamin Khan	GHS Sia Warghar	24/04/1969	-----do-----
6	216	Hazrat Nabi	GHS Bajawro Talash	15/05/1972	-----do-----
7	284	Siad Nawab	GHS Shawa	01/01/1966	-----do-----
8	304	Mohammad Idris	GMS Warsak	23/09/1968	-----do-----
9	315	Fazal Qayyum	GHS Chinar Kot	05/10/1966	-----do-----
10	352	Ayoub Khan	GHS Dheri Kashmir	09/12/1974	-----do-----

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Near National Bank Colony,
Balambat Chowk, Timergara.
Ph: 0945-822994, Mob: 0300-9398707

11	433	Mohammad Hanif	GHS Munjai	02/02/1973	-----do-----
12	434	Usman Khan	GMS Mandesh	01/06/1973	-----do-----
13	435	Said Karim Khan	GHS Pingul	04/03/1971	-----do-----
14	536	Abdullah Shah	GHS Banda Talash	01/08/1978	-----do-----
15	537	Mohammad Riaz	GHS Melakandi	13/01/1971	-----do-----

2. PROMOTION OF PSHT/SPST/PST TO THE POST OF SSK (Phy-Maths) BPS-16.

Total No. of SST Phy-Maths (M) Posts vacant Posts	43
25% share initial recruitment	10
75% share for Promotion.	33
20% Share of promotion of PSHT/SPST/PST	09
Posts available for promotion	09
Promoted through this order	09

S. No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	1021	Muhammad Irshad	GPS Kas Amlook Dara	11/02/1971	Services placed at the disposal of DEO (M) Dir Lower for further posting against SST (Phy-Maths) post on school based.
2	1031	Aziz Ul Haq	GPS Badin	08/01/1973	-----do-----
3	1037	Muzafar Said	GPS Saifroona	05/01/1974	-----do-----
4	1042	Muht Qayum Khan	GPS Baghkandai	13/04/1969	-----do-----
5	1054	Muhammad Asad	GPS Kalo Manai	15/05/1968	-----do-----
6	1053	Khadi Muhammad	GPS Teknai Pajeen	06/03/1969	-----do-----
7	1211	Rashid Khan	GPS Kuya Wulu Shawa	10/03/1973	-----do-----
8	1390	Fazal Hadi	GPS Tindo Daq	14/12/1965	-----do-----
9	1308	Johar Ali	GPS Katarar	15/03/1972	-----do-----

3. PROMOTION OF SDM/DM TO THE POST OF SST (Phy-Maths) BPS-16

Total No. of SST Phy-Maths (M) Posts vacant Posts	43
25% share initial recruitment	10
75% share for Promotion.	33
4% Share of promotion of SDM/DM	02
Posts available for promotion	02
Promoted through this order	02

S. No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	68	Zahid Gul	GMS Lalko	04/06/1972	Services placed at the disposal of DEO (M) Dir Lower for further posting against SST (Phy-Maths) post on school based.
2	78	Muhammad Rahman	GHS Adam Dheri	05/03/1971	-----do-----

C. SST (General)

PROMOTION OF SCT/CT TO THE POST OF SST (General) BPS-16

Total No. of SST General (M) Posts vacant Posts	60
25% share initial recruitment	15

Intikhab Photo State

Near National Bank Colony,
Balambat Chowk, Timergara.
Ph: 0945-822994, Mob: 0300-9398707

	Rahman	Brangola		Dir Lower for further posting against SST (General) post on school based.
25	Aziz Ul Haq	GHS Mian Kalay	01/02/1973	-----do-----

6. PROMOTION OF S Qari/Qari TO THE POST OF SST (General) BPS-16

Total No. of SST General (M) Posts vacant Posts	60
25% share initial recruitment	15
75% share for Promotion.	45
3 % Share of promotion of S Qari/Qari	02
Posts available for promotion	02
Promoted through this order	02

S.No	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	4	Abdullah	GHS Lajpore	04/01/1970	Services placed at the disposal of DEO (M) Dir Lower for further posting against SST (General) post on school based.
2	5	Muhammad Karim	GHS Sadbar Kalay	15/12/1965	-----do-----

Terms and conditions:-

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Se seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.
7. They will give an undertaking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he/she is wrongly promoted he/she will be reversed.
8. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
9. Their posting will be made on School based, They will have to serve at the place of posting, and their service is not transferable to any other station.
10. Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(Muhammad Rafiq Khattak)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

3466-70
Encl: No. / File No. 2/Promotion SST B-16: Dated Peshawar, the 28/10/2014.

- Copy forwarded for information and necessary action to the:-
1. Accountant General Khyber Pakhtunkhwa Peshawar.
 2. District Education Officer concerned
 3. District Accounts Officer concerned
 4. Official Concerned.
 5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
 6. PA to the Director E&SE Khyber Pakhtunkhwa Peshawar.
 7. M/File

Dy: Director (Estab) 14
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

District Education Officer (M) Dir Lower

13

PH No. 0945-9250082,

E-mail emisdn-lower@yahoo.com

OFFICE ORDER:

Consequent upon the Notification issued by the Director (E&SE) Khyber Pakhtun Khwa Peshawar Endst. No. 3466-70/File No.2/Promtion SST B-16 dated Peshawar the 28/10/2014. The following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, S.Qari/Qaris and PSHTs/SPSTs/PSTs are hereby adjusted against the vacant posts of SST (Bio-Chem), SST (Maths-Phy), SST (Gen) school based at the schools noted against each in the intrest of public service with immediate effect. Terms and conditions will remain the same as mentioned in the notification refered above.

A1. Promtion of SCTs/CTs to the post of SST (Bio-Chem) B-16

S#	S.L.No	Name of Official	Present place of posting	School where adjusted	Remarks
1	112	Habibur Rahman	GHS Shontala	GIS Dheri Kambat	Against Vacant Post
2	113	Sher Mohammad	GIS Dalambat	GIS Darmal Bala	Against Vacant Post
3	120	Bakht Ali	GHS Bagh Dushkhel	GHS Chakdara	Against Vacant Post
4	131	Khan Badshah	GHSS Lal Qilla	GHS Lajbook	Against Vacant Post
5	139	Habibur Rahman	GMS Shontala	GIS Shontala	Against Vacant Post
6	181	Shauibur Rahman	GHSS Khali	GIS Luqman Banda	Against Vacant Post
7	263	KHAISTA RAHMAN	GHS GUMBAT BANDA	GIS Shalleani	Against Vacant Post
8	264	Israr Ahmad	GISS Munda	GIS Ouch Sharqi	Against Vacant Post
9	283	Gul Wahid	GMS Bambolai	GIS Dheri Kashmir	Against Vacant Post
10	295	Sikandar Ali	GIS Sangwalai	GIS Sakarai Khali	Against Vacant Post
11	303	Mohammad Israr	GMS Ajoo Talash	GIS Shamsi Khan	Against Vacant Post
12	313	Badshahuddin	GHSS Saddo	GHS Munjai	Against Vacant Post
13	441	Hamad	GCMHS Timergara	GIS Rabat	Against Vacant Post
14	449	Nasrullah	GIS Osalal	GIS Osalal	Against Vacant Post
15	495	Mohammad Zia Ul Amin	GMS Utala	GIS Dheri Talash	Against Vacant Post

A2. Promtion of PSHTs/SPSTs/PSTs to the post of SST (Bio-Chem) B-16

S.L.No	Name of Official	Present place of posting	School where adjusted	Remarks
1018	Rahmani Gul	GPS Hundak	GIS Chinar Kot	Against Vacant Post
1030	Zarbaz Khan	GPS Takwara	GIS Jawzo	Against Vacant Post
1261	Gulab Rehman	GPS Khona Picket	GIS Takwara Shelchan	Against Vacant Post
1405	Muzafar Khan	GPS Zimdara	GIS Shekawlai Torwang	Against Vacant Post
1409	Said Bashir Ahmad	GPS Hisaral Bala	GIS Malkhai	Against Vacant Post
1500	Asghar Khan	GPS Qandaray	GIS Sadbar Kali	Against Vacant Post
1674	Hanif Ullah	GPS Shakar Tangai	GHS Biyari	Against Vacant Post
1714	Latif Ullah	GPS Rabat	GHS Darmal Payeen	Against Vacant Post

Promotion of SCTs/CTs to the post of SST (Phy-Maths) B-16

#	S.L.No	Name of Official	Present place of posting	School where adjusted	Remarks
1	145	Ahmad Bacha	GHS Munjai	GHS Haji Abad	Against Vacant Post
2	168	Falak Naz	GHS Shawa	GHS Khanpur	Against Vacant Post
3	183	Jehan Bahadar	GHS Maidan Bandai	GHS Mirgam Bala	Against Vacant Post
4	185	Mohammad Iqbal	GHS Toor Mang	GHS Toor Mang	Against Vacant Post
5	187	Sarzamin Khan	GHS Sia Warghar	GHS Sia Warghar	Against Vacant Post
6	216	Hazrat Nabi	GHS Bajawro Talash	GHS Khungi	Against Vacant Post
7	284	Siad Nawab	GHS Shawa	GHS Shawa	Against Vacant Post
8	304	Mohammad Idris	GMS Warsak	GHS Shago Kas	Against Vacant Post
9	318	Fazal Qayyum	GHS Chinar Kot	GHS Maniyal	Against Vacant Post
10	362	Ayoub Khan	GHS Dheri Kashmir	GHS Dheri Kashmir	Against Vacant Post
11	437	Mohammad Hanif	GHS Munjai	GHS Rehanpur	Against Vacant Post
12	493	Usman Khan	GMS Mandesh	GHS Kadh	Against Vacant Post
13	494	Said Karim Khan	GHS Pingal	GHS Pingal	Against Vacant Post
14	506	Abdullah Shah	GHS Banda Talash	GHS Bajawro Talash	Against Vacant Post
15	515	Mohammad Riaz	GHS Malakand	GHS Sado	Against Vacant Post

B2. Promotion of PSHTs/SPSTs/PSTs to the post of SST (Phy-Maths) B-16

S#	S.L.No	Name of Official	Present place of posting	School where adjusted	Remarks
1	1021	Muhammad Irshad	GPS Kas Amlook Dara	GHS Bagh Dushkhel	Against Vacant Post
2	1031	Aziz Ul Haq	GPS Badin	GHS Sadbar Kali	Against Vacant Post
3	1037	Muzafar Said	GPS Safoona	GHS Khair Abad	Against Vacant Post
4	1042	Muht Qayum Khan	GPS Baghbandai	GHS Peto Dara	Against Vacant Post
5	1054	Muhammad Asad	GPS Kalo Manai	GHS Banda Talash	Against Vacant Post
6	1055	Khadi Muhammad	GPS Teknai Payeen	GHS Shalkanai	Against Vacant Post
7	1211	Rashid Khan	GPS Kaga Wala Shawa	GHS Shelawtal Tormang	Against Vacant Post
8	1390	Fazal Hadi	GPS Tindo Dag	GHS Malakand	Against Vacant Post
9	1408	Johar Ali	GPS Katarar	GHS Takwara Shekhan	Against Vacant Post

B3. Promotion of SBMs/DMS to the post of SST (Phy-Maths) B-16

S#	S.L.No	Name of Official	Present place of posting	School where adjusted	Remarks
1	68	ZAHID GUL	GMS LALKO	GHS Kotigram	Against Vacant Post
2	70	MUHAMMAD RAHMAN	GHS ADAM DIHRI	GHS Pulhatro Khadagzi	Against Vacant Post

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Promtion of SCTS/CTs to the post of SST (G) B-16

S.L.No	Name of Official	Present place of posting	School where adjusted	Remarks
1	Wazir Badshah	GHS Khall	GIIS Shelawal Formang	Against Vacant Post
2	Jekangir	GCMHS Timergara	GIIS Kadh	Against Vacant Post
3	Mohammad Shah Jehan	GMS Koor Shing	GMS Koorshung	Against Vacant Post
4	Hidayat Khan	GHS Kotigram	GIIS Kotigram	Against Vacant Post
5	Jehun Badshah	GIIS Shalkandai	GMS Banr	Against Vacant Post
6	Nabi Hakeb	GIIS Lal Qilla	GIIS Qilagai Star	Against Vacant Post
7	Abdul Hamid	GCMHS Timergara	GIIS Haji Abad	Against Vacant Post
8	Hassan Zeb	GHS OUCH	GIIS Ouch	Against Vacant Post
9	Ghous Ur Rahman	GMS Qandari	GMS Qandari	Against Vacant Post
10	Mohammad Zahir	GIIS Shamsi Khan	GIIS Jawzo	Against Vacant Post
11	Amir Zaman	GHS Khanpur	GMS Khanpur	Against Vacant Post
12	Mohammad Zahid	GIIS Hagh Dush Khail	GMS Katan Dushkheil	Against Vacant Post
13	Shafiqur Rahman	GCMHS Timergara	GCMHS Timergara	Against Vacant Post
14	Bakht Jamal	GHS Khanpur	GIIS Khanpur	Against Vacant Post
15	Mohammad Sydul Abrar	GHS Chakdara	GIIS Adam Dheri	Against Vacant Post
16	Fakheuddin	GMS Mian Banda	GHS Spina Khawra	Against Vacant Post
17	Ubaidur Rahman	GIIS OUCH	GIIS OUCH	Against Vacant Post
18	Silandar Khan	GIIS Badwan	GIIS Chakdara	Against Vacant Post
19	Mohammad Qurish	GMS Shagai Asbanr	GIIS Asbanr	Against Vacant Post
20	Hassan Khan	GIIS Ouch Shargi	GIIS Ouch Shargi	Against Vacant Post
21	Ghulam Rahman	GHS Kambat	GMS Surkh Dheri	Against Vacant Post
22	Mohammad Saffin	GHS Bagh Dush Khail	GIIS Dheri Kashmir	Against Vacant Post
23	Abdur Raziq	GHS Ouch	GIIS Srai Bala	Against Vacant Post
24	Tajuddin	GIIS Mian Kalay	GMS Hisarak	Against Vacant Post

C2. Promtion of PSHTs/SPSTs/PSTs to the post of SST (G) B-16

#	S.L.No	Name of Official	Present place of posting	School where adjusted	Remarks
	10	Muht Saeed Badshah	GPS Chikho	GMS Khadang	Against Vacant Post
	71	Fateh Mahmood	GPS Thaoda Chena No.1	GIIS Pingal	Against Vacant Post
	75	Mohammad Zahoor	GPS Tangi Shamsi Khan	GIIS Jawzo	Against Vacant Post
	89	Jan Badshah	GPS Gdya Khwar	GMS Lalko	Against Vacant Post
	99	Sardar Khan	GPS Shadas	GIIS Shamsi Khan	Against Vacant Post
	122	Faiz Tafab Khan	GPS Katan Payeen	GIIS Safari Khal	Against Vacant Post
	125	Shahabud Din	GPS Zafar Abad	GIIS Ouch	Against Vacant Post
	132	Amir Abdur Rahman	GPS Timergara	GIIS Mian Kali	Against Vacant Post
	147	Mahfooz Ur Rahman	GPS Kadh	GIIS Ouch	Against Vacant Post
	166	Muslim Khan	GPS Nasufa	GIIS Khanpur	Against Vacant Post
	171	Syad Faqir Khan	GPS Takwara Sheldan	GIIS Pato Talash	Against Vacant Post
	172	Shafi Ul Haq	GPS Shelawal	GMS Mandesh	Against Vacant Post

C3. Promotion of SDMS/DMS to the post of SST (G) B-16

S#	S.L.No	Name of Official	Present place of posting	School where adjusted	Remarks
1	8	HABIB GUL	GMS MANDESH	GMS Ganjla Rabat	Against Vacant Post
2	11	BAKHT MUNIR	GHS Bagh Maidan	GHS Gumbat Banda	Against Vacant Post

C4. Promotion of SATs/ATs to the post of SST (G) B-16

S#	S.L.No	Name of Official	Present place of posting	School where adjusted	Remarks
1	17	JELIAN POROOQ	GHS SHEKAWLI	GMS Sair Tormang	Against Vacant Post
2	18	MEEM ZAMAN KILAN	GHS Haji Abad	GHS Koheray	Against Vacant Post

C5. Promotion of STTs/TTs to the post of SST (G) B-16

S#	S.L.No	Name of Official	Present place of posting	School where adjusted	Remarks
1	4	LUTPUR RAHMAN	GHS Mian Branjola	GHS Adam Dheri	Against Vacant Post
2	25	AZIZ UL HAQ	GHS MIAN KALAY	GMS Kakas	Against Vacant Post

C6. Promotion of S.Qaris/Qaris to the post of SST (G) B-16

S#	S.L.No	Name of Official	Present place of posting	School where adjusted	Remarks
1	4	ABDULLAH	GHS LAJBOOK	GHS Beyari	Against Vacant Post
2	5	MUHAMMAD KARIM	GHS SADBAR KALAY	GHS Damtal	Against Vacant Post

(Muhammad Ibrahim)
District Education Officer (M)
District Dir Lower

Endst. No. 13917-21

Dated Timergara the 01/11/2014

Copy of the above is forwarded to:

1. The Director (E&SE) Khuber Pakhtoon Khwa Peshawar.
2. The District Accounts Officer Dir Lower.
3. The Principals / Headmaster of the institute concerned.
4. The Deputy District Education Officer (M) Dir Lower.
5. The Officials concerned.

District Education Officer (M)
District Dir Lower

OFFICE ORDER:-

The following trained PTC Candidates from Halqa, PE-78-Dir Chakdara Adenzai are hereby appointed as PTC teachers in MS No.7 in the Schools as noted against their names subject to the following terms and conditions with immediate effect.

S.No.	Name of Candidate/Father's Name.	Village.	School where appointed.	Remarks.
1.	Mr. Muzaffar Said.	Hazrat Yousaf.	Ouch.	GPS Dehrai Ouch. V. Post. ✓
2.	Mr. Umar Saman.	Abdul Akbar.	Kityarai.	" Kabalo. -de-
3.	Mr. Ashfaqur Rahman.	Said Hazrat.	Bungokass.	" Gha Adam. -de-
4.	Mr. Mislakud Din.	Mohd Hussain.	Kityarai.	" Raghbenai. -de-
5.	Mr. Sardar Hussain.	Fazli Ghafoor.	Battan.	" Barinkai. -de-
6.	Mr. Mohammed Haecm.	Mohd Zubin.	Tuzgram.	" Banda Sheh. -de-
7.	Mr. Usman Ghani.	Mohd Yousaf.	Tiknai(B)	Kaskui. -de-
8.	Mr. Alam Sher.	M. Noor Halim.	Inzargai.	" Shershing. -de-
9.	Mr. Azam Khan.	Fateh Khan.	Kityarai.	" Kumbhar Asbanr. -de-
10.	Mr. Amir Hassan Khan.	Khaista Khan.	Hamza Banda.	MPS Dehrai Ouch. -de-
11.	Mr. Mohammad Islam.	Munjawar Khan.	Ouch Sh.	MPS Kaskui. -de-
12.	Mr. Mohammad Qayoom Khan.	Mohd Umar.	Bagh Kandi.	" Misyalawar. -de-
13.	Mr. Mohd Haniff.	Mohd Haecm.	Chakdara.	" Barorai Shah. -de-
14.	Mr. Abdul Latif.	Fazal Wadeed.	Ramyal.	" Sam Patai. -de-
15.	Mr. Diltaraz Khan.	Saidur Rahman.	Badwan(B)	" Khawar Kumbhar. -de-
16.	Mr. Husein Gul.	Fateh Gul.	Ouch.	" Kotigra. Colony -de-
17.	Mr. Amir Jafar.	Musak Jalal.	Kityarai.	" Deep Raghbenai. -de-
18.	Mr. Shafiullah.	Gul Mohammad.	Khalrabad.	" Khawar Khawar. -de-
19.	Mr. Bakht Amin.	Mohd Amir.	Asbanr.	" Mina Utale (Asba-dor).

TERMS AND CONDITIONS:-

- Charge report should be submitted to all concerned.
- Health & Age Certificate should be produced from the Civil Surgeon Dir at Timergara.
- They may not be handed over the charge if their age exceeds 25 years or below 18 years.
- Their appointment being temporary are liable to termination at any time without notice. In case of leaving service in this Department they will have to give one notice in advance or deposit one months pay.
- Before handing over charge their original documents should be checked.

(SIRAJUL - HAQ)
DISTT. EDUCATION OFFICER,
(M) PRY: DIR AT TIMERGARA.

OFFICE OF THE DISTT. EDUCATION OFFICER (M) PRY: DIR AT TIMERGARA.

Distt. No. 2328-48/PEB/A-I Dated Timergara the 29/8/1994.

Copy forwarded for information n/action & Compliance to:

- The SDEO (M) Timergara for information.
- The Distt. Accounts Officer, Dir at Timergara.
- The Candidates concerned.

DISTT. EDUCATION OFFICER,
(M) PRY: DIR AT TIMERGARA.

Amir



University of Peshawar

(Pakistan)

Session ANNUAL 1995

HAZAFFAR SAID

Son

of

HAZRAT YOUSAF

and a student

of GOVT. DEGREE COLLEGE THANA

having passed the prescribed examination

held in AUGUST 1995; is this day admitted by the University of Peshawar

to the Degree of

Bachelor of Science

in the SECOND division.

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

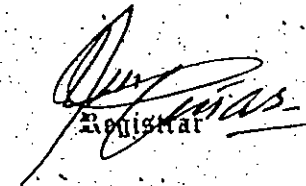
Serial No. 013522

Registered No. 93-T-2939

Roll No. 7116

Result declared on MARCH 1, 1997




Registrar

Countersigned


Vice-Chancellor

18

19



University of Peshawar (Pakistan)

Detailed Marks Certificate No. 007088

B.Sc. Part-11 Examination 1995

Mr. / Ms. Muzaffar Said Roll No. 7116Certified that the candidate secured the following marks and is placed in Second Division.

SUBJECTS	Marks allotted	Marks obtained	Marks in Words	
Physics	75	32	Thirty two	
Maths - A	75	27	Twenty seven	
Maths - B	75	30	Thirty only	
Pakistan Studies	40	22	Twenty two	
B.Sc. Part-I marks :	285	142	One hundred & Forty two	
Errors and omissions are subject to subsequent rectification	Total ..	550	253	Two hundred & Fifty three

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

Result Declaration date.....

Date 15 FEB 1997

Controller of Examinations,
University of Peshawar.

Attested R

Shah Wazir Khan

SCT BPS 16
G.H.S.S. Khair Abad
Dir (Lower)

Virtual University of Pakistan



Virtual University

Upon the recommendation of

The Faculty of Computer Science and Information Technology

confers upon

Muzaffar Said

son of Hazrat Housaf

the degree of

Master of Computer Science (2 year program)

With all the rights, honors and privileges pertaining thereto

given this

fifth day of January two thousand and twelve

A handwritten signature in black ink, appearing to read 'MUC' followed by a stylized flourish.

Controller of Examinations



A handwritten signature in black ink, appearing to read 'Said A. Rector'.

Rector

Virtual University of Pakistan



TRANSCRIPT OF RECORD

Master of Computer Science (2 year program)

Student ID: MC060400207
 Name: MUZAFFAR SAID
 Father's Name: HAZRAT YOUSAF

Registration No: 006-VU-003073
 Result Notification No: VU-CE/Masters/11/0154
 Result Notification Date: August 25, 2011

Code	Course Title	Cr. Hrs.	Grade	G.P.	Remarks
CS201	Introduction to Programming	3	C	2.20	R,I
CS402	Theory of Automata	3	C	2.40	I
CS601	Data Communication	3	B	3.73	R,I
ENG201	Business and Technical English Writing	3	C	2.27	I
MTH202	Discrete Mathematics	3	D	1.10	I
STA301	Statistics and Probability	3	D	1.00	R
CS301	Data Structures	3	D	1.60	R,I
CS302	Digital Logic Design	3	D	1.60	R
CS304	Object Oriented Programming	3	C	2.33	R,I
CS401	Computer Architecture and Assembly Language Programming	3	C	2.53	R
CS403	Database Management Systems	3	B	2.13	R
MTH603	Numerical Analysis	3	D	1.90	R
CS501	Advance Computer Architecture	3	C	2.40	I
CS502	Fundamentals of Algorithms	3	C	2.53	R,I
CS504	Software Engineering - I	3	C	2.27	I
CS610	Computer Network	3	B	3.00	I
CS614	Data Warehousing	3	C	2.87	I
CS506	Web Design and Development	3	D	1.60	I
CS604	Operating Systems	3	C	2.33	I
CS605	Software Engineering II	3	C	2.40	I
CS607	Artificial Intelligence	3	C	2.67	I
CS609	System Programming	3	C	2.60	I
CS619	Final Project - CS619	6	B	3.07	I

CGPA: 2.32
 Credits earned: 72
 Credits transferred: 0
 Credits exempted: 0
 Credits counted towards degree: 72
 Credits required: 72
 All degree requirements completed


 Controller of Examinations

Roll No. G-6343486

Serial No. 39240

**ALLAMA IQBAL OPEN UNIVERSITY
ISLAMABAD**



PROVISIONAL CERTIFICATE

This is to certify that Mr./Ms. MUZAFFAR SAID
Son/Daughter of HAZRAT YOUSAF
Registration No. 97-NDR-0618 has passed,

BACHELOR OF EDUCATION

examination with the subjects detailed below in Spring/~~XXXX~~ 1999
Semester.

S. No. Code/Subjects

Marks obtained

Compulsory:

1.	513-School Organization and Management	<u>54</u> / 100
2.	514-Evaluation, Guidance and Research	<u>58</u> / 100
3.	518-Educational Psychology and Curriculum	<u>51</u> / 100
4.	651-English	<u>46</u> / 100
5.	512-Perspectives of Education	<u>55</u> / 100
6.	652-Islam, Pakistan and Modern World	<u>73</u> / 100
7.	655-Practical Component	<u>86</u> / 100

Electives:

8.	520-TEACHING OF BIOLOGY	<u>57</u> / 100
9.	656-TEACHING OF PHYSICS	<u>50</u> / 100

Total: 530 / 900

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

Islamabad 25TH JAN, 2000.
Dated:

Prepared by: [Signature]

Checked by: [Signature]

[Signature]
Controller of Examinations

Allama Iqbal Open University



علامہ اقبال اوپن یونیورسٹی

MUZAFAR SAID

Regn. No. 97-MDR-0618

رجسٹریشن نمبر

مظفر سید

son/daughter of HAZRAT YOUSAF

حضرت یوسف

بن / بنت

having completed the prescribed requirements
in SPRING, 19⁹⁹ is awarded the degree of

کو بہار 99ء میں مطلوبہ شرائط مکمل کرنے پر

Bachelor of Education

بی۔ ایڈ

He/She secured 59 % marks and was placed
in B grade.

کی ڈگری عطا کی گئی۔ اس نے 59 فیصد نمبر لے کر بی گریڈ حاصل کیا۔

Muzafar Said

Vice Chancellor

وائس چانسلر

Islamabad

Dated : 25TH JAN, 2000

Controller of Examinations

کنٹرولر امتحانات

25 جنوری 2000ء

اسلام آباد
تاریخ

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



SARHAD UNIVERSITY

OF SCIENCE & INFORMATION TECHNOLOGY, PESHAWAR

Transcript No. SU/23807 **T R A N S C R I P T** 24

Name: Muzaffar Said Reg. No: SUIT-12-01-036-0098
Father's Name: Hazrat Yousaf Roll No: 12-FA-73447
Degree: Master of Education Enrollment Date: 03 Sep, 2012
Faculty: Arts, Social Sciences and Education Completion Date: 10 Oct, 2013

1st Semester:		Cr Hrs	Marks	Grade	GPs	Remarks
SME 626	Comparative Education	3 - 0	80	B+	10.5	
SME 627	Computers in Education	3 - 0	62	C	6	
SME 628	Educational Research	3 - 0	79	B+	10.5	
SME 629	Advance Educational Psychology	3 - 0	78	B+	10.5	
SME 630	Guidance and Counselling	3 - 0	74	B	9	
Cum Cr: 15.0 GPA: 3.100 Cum GPA: 3.10 Status: PTD						

2nd Semester		Cr Hrs	Marks	Grade	GPs	Remarks
RES 381	Qualitative Research Methods	3 - 0	62	C	6	
RES 382	Quantitative Research Methods	3 - 0	56	D+	4.5	
SME 631	Educational Management and Supervision	3 - 0	71	B	9	
SME 632	Education in Pakistan: Problems Issues & Trends	3 - 0	75	B	9	
SME 633	Curriculum Development and Implementation	3 - 0	58	D+	4.5	
SME 635	Teacher Education in Pakistan	3 - 0	66	C+	7.5	
SME 643	Non-Formal and Distance Education	3 - 0	78	B+	10.5	
Cum Cr: 36.0 GPA: 2.429 Cum GPA: 2.71 Status: QFD						

Marks Obtained : 839 Total Marks : 1200 Overall Percentage : 69.92%

(Errors and omissions are subject to subsequent rectification)
----- END OF TRANSCRIPT -----

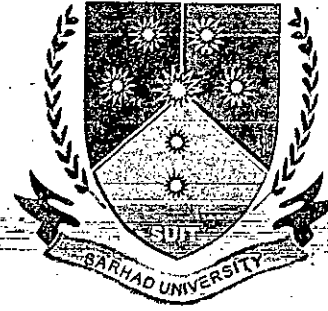
Dean

(Degree Completed)

Controller of Examinations

Registration No. SUIT-12-01-036-0098

Serial No. 012438



25

Sarhad University of Science & Information Technology

This is to certify that Muzaffar Said

son/~~daughter~~ of Hazrat Yousaf

Having passed the requisite examination, is hereby awarded the degree of

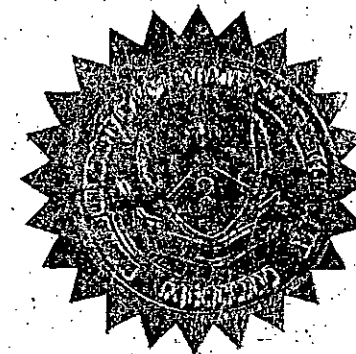
Master of Education

With all the rights and privileges appertaining thereto.

Given at Peshawar (PAKISTAN) on the Tenth Day of December Two Thousand Thirteen.

Registrar

Vice Chancellor



President



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th July, 2014.

NOTIFICATION

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

AMENDMENTS

In the Appendix,-

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

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

(1)

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

(ii) against Serial No. 1B, as so renumbered, for the existing entries, the following shall be substituted, in respective column namely

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

28

29

			<p>Senior Teaching Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(c) four per cent from amongst the Senior Arabic Teachers(BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, and having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(d) four per cent from amongst the Senior Theology Teachers(BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3;</p>
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30

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

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

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

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

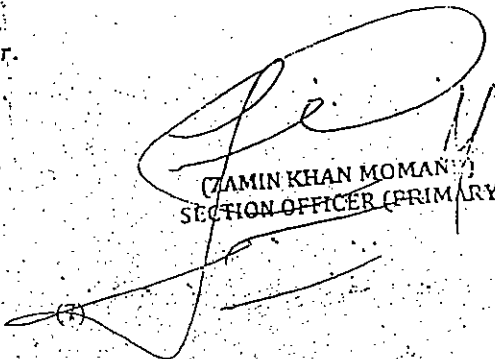
Provided that if no suitable candidate is available from amongst

(5)

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst : of even No & date:

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


ZAMIN KHAN MOMAN
SECTION OFFICER (PRIMARY)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Subject: MINUTES OF THE MEETING OF THE SSRC REGARDING ALLOTMENT OF 50% QUOTA TO SST (GEN/SC) FOR PROMOTION TO THE POST OF SS-IT

Meeting of the SSRC regarding the subject matter was held under the Chairmanship of Secretary Elementary & Secondary Education Department on 10/08/2017 at 11:00 am in the committee room of this Department. The following Officers/Officials of the concerned Department/attached Department attended the meeting.

The following attended the meeting:-

1. Dr. Shahzad Khan Bangash, Secretary E&SE Department (In Chair)
2. Mr. Qaisar Alam, Special Secretary (Est.) E&SE Department.
3. Mr. Muhammad Rafiq Khattak, Director E&SE, Peshawar.
4. Mr. Muhammad Shoaib, Deputy Secretary (A), E&SE Department
5. Mr. Javed Siddique, Deputy Secretary (R) Finance Department.
6. Mr. Naik Muhammad, Section Officer (Primary) E&SE Department.
7. Mr. Mohsin Mushtaq, Assistant (R-I) E&AD Department.

2. The forum was informed that E&SE Department vide Notification No. SOG/E&SED/1-86/SS.IT/2016 of E&SE Department Peshawar dated 15.08.2016 has notified the nomenclature of Information Technology Teaching Cadre/Posts serving in the Government High & Higher Secondary Schools of Khyber Pakhtunkhwa of E&SE Department, as Subject Specialist-IT (SS-IT/Computer Science) BPS-17 (Annex-A). Further E&SE Department vide Notification No. SO (PE)4-5/SSRC/Meeting/ 2013/ Teaching Cadre: dated 24/07/2014 has approved promotion to SS posts (BPS-17) from SST (BPS-16). The SST regular having 50% quota of the total sanctioned SS posts allotted for promotion (Annex-B). 50% quota has already been allotted for SSTs (General/Science) in 12 different subjects for Subject Specialist Post. But unfortunately, SSTs (General/Science) who have M.Sc (Computer Science)/BS (CS)/MIT qualification and are eligible for promotion to the post of SS (IT) B-17 have no quota for promotion.

3. In light of the above facts, this Department, therefore, proposed that all those SSTs (General/Science) who have M.Sc. (Computer Science)/BS (Computer Science)/MIT may be given 50% quota for promotion to the post of SS (IT) B-17 like other SSTs, so as to bring uniformity in the teaching cadre.

4. In the above context, the service rules/structure of SST (General/Science) & SST (IT) were approved as tabulated below: -

No	Nomenclature of the post	Minimum Qualification for appointment by initial recruitment or by transfer.	Age Limit	Method of recruitment
1	Subject Specialist-Information Technology (SS-IT) (B-17) Government Higher Secondary Schools/ Govt. comprehensive High Schools and other equivalent posts in the Teaching Cadre.	i.) Master Degree in Computer Science/IT at least in 2 nd Division or equivalent qualification from any recognized University. ii.) Bachelor Degree of Education (B.Ed) at least in 2 nd Division from any recognized University	21-35	a). Fifty percent by promotion on the basis of seniority-cum-fitness from amongst the Secondary School Teacher-IT with at least five years' service AND Secondary School Teacher (SST) (General/Science) possessing master degree in IT or equivalent qualification with 05 years' experience b). Fifty percent by initial recruitment. Note: If no suitable candidate is available for promotion in the relevant cadre than by initial recruitment. Their seniority may be clubbed with SS and amendment may be made in the existing service rules.
2.	Secondary School Teacher Information Technology (SST-IT) (B-16) Govt. High /Higher Secondary Schools	i). Bachelor Degree with the subject of Computer Science at least in 2 nd Division or equivalent Qualification from any recognized institution.; ii). Bachelor Degree of Education (B. Ed) at least in 2 nd Division from any recognized institution.	21-35	a). Fifty percent by promotion on the basis of seniority-cum-fitness from amongst the Computer Lab In-charge with (05) years' service having the qualification prescribed for the post of IT Teacher. b). Fifty percent by initial recruitment. Note: If no suitable candidate is available for promotion in the relevant cadre than by initial recruitment.
3.	Junior Teacher- Information Technology (JT-IT) (B-12) Govt. High/Higher Secondary Schools	Intermediate or equivalent qualification from any recognized institution with one-year Diploma in IT/Computer Science from any recognized institution and Certified Teacher Certificate/Diploma or equivalent qualification from any recognized institution.	18-35	By initial recruitment.

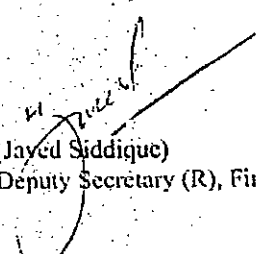
The committee members discussed the proposed amendments in the service rules/structure for the SST (General/Science) & SST (IT) in depth and were agreed upon unanimously.

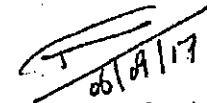
3 24 9,
Decisions:


The following decisions were made in consensus: -


- i. The proposed amendments in the service rules/structure as depicted in the above table was approved.
- ii. Nomenclature of the post of CT(IT) was changed as Junior Teacher Information Technology (JT-IT)
- iii. Seniority of SST (General/Science) & SST (IT) will be clubbed together immediately for the purpose of promotion in light of the above amended service rules for the post of SST (General/Science) & SST (IT) to the post of SS(IT/Computer Science)

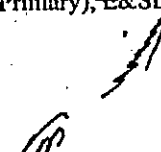
The meeting ended with vote of thanks to/from the Chair.

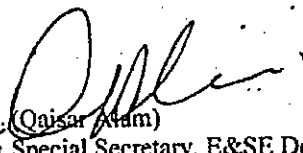

(Jayed Siddique)
Deputy Secretary (R), Finance Department

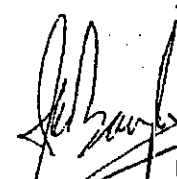

(Mohsin Mushtaq)
Assistant (R-I), E&AD Deptt:


Naik Muhammad
Section Officer (Primary), E&SE Department


Muhammad Shoaib
Deputy Secretary (A), E&SE Deptt:


(Mohammad Rafique Khattak)
Director, E & SE, Peshawar


(Qaisar Adam)
Special Secretary, E&SE Deptt:


12/9/17
Dr. Shahzad Khan Bangash
Secretary E&SE Department
(Chairman)

To,

The Most Respected
Secretary E & SE Department
Khyber Pakhtunkhwa Peshawar,

Through: The Director
E & SE Department
K.P.K.

Subject; Appeal For SST (Gen/Sc) Promotion to
SS (IT) according to the SSRC meetings
on 10/08/2017 & on 02/01/2018 Regarding
allotment of 50% & 20% Quota to SST (Gen/Sc)
For Promotion to the Post of SS (IT)

Respect Sir,

that we i.e. (Atiqur Rahman, Muhib Ullah, Barkat Ullah,
Abi Akbar, Ihsan Ullah, Aftab Ullah, Gayyoon Khan, Gohar Zaman, Muhammad Aslam,
Khan Ullah, Arshad Ali Khan, Muzaffar Said, Niaz Ahmad, Mujahid Farooq Sadiq,
Hussain Rehman, Fazli Bavi & Rafiq Ahmad Khan).

Serving against SST (Gen/Sc) Posts in the E & SE Dept.

With most veneration it is to bring in your kind notice that
50% quota has already been allotted for SSTs (Gen/Sc) in the
different subjects for Subject Specialist Post but unfortunately,
SST (Gen/Sc) who have M.S (Computer Science) / BS (CS) / M.T
qualifications & are eligible for promotion to the Post of SS (IT)

B.S-17 have no quota for promotion.

But in the SSRC meeting on 10/08/2017, E & SE Dept
Proposed that all those SST (Gen/Sc) who have M.Sc
(Computer Science) / BS (CS) / M.T may be given 50%

quota for promotion to the Post of SS (IT) B.S.-17 Like other SSTs, so as to bring uniformity in teaching Cadre

in the SSRC meeting on 02/01/2018 ECSE Deptt. may be given 20% quota for Promotion.

Now according to the SSRC meeting on 12/08/2017 & on 02/01/2018 the quota should be properly notified.

Thanks

Dated: 13/09/2018

① Atiqur Rahman

DS (Admin)

② Muhib Ullah

(Recd. 13/9/18)
Dated 13/9/2018

etc.

JUDGMENT SHEET
IN THE PESHAWAR HIGH COURT, D.I. KHAN BENCH
(General Department)

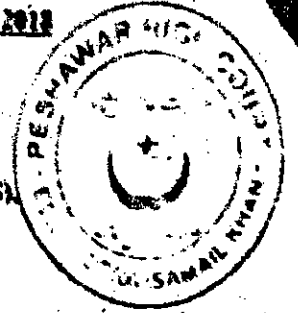
"E"

Writ Petition No. 877-D with C.A. Nos. 1099-D & 1101-D of 2018

Abdul Ahad and 9 others

Versus

Govt. of Khyber Pakhtunkhwa through Secretary (E&S)
Peshawar and seven others



JUDGMENT

Date of hearing

30.01.2019

For petitioners:

Muhammad Anwar Awan Advocate

For respondents:

Mr. Kamran Hayat Miankbel, Addl:
A.G and Mr. Zia ur Rehman Qazi
Advocate

S.MATTIQUE SHAH, J.- Through the instant petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, the petitioners Abdul Ahad and others have prayed that:-

"In wake of above submission it is respectfully prayed that on acceptance of this writ petition may kindly direct the respondent to collect the documents from SST (General/Science) for promotion as Subject Specialist (IT) and consider them according to rules. It is also further prayed that may kindly direct the respondents to amend or interpret the promotion rules by providing ample opportunity to SST (General/Science) as Subject Specialist (IT) BS-17."

ATTESTED
2-2-19
EXAMINOR
Peshawar High Court
D.I. Khan Bench

2. The petitioners are serving as Secondary School Teacher (General/Science) and seek issuance of writ

directing the respondents to collect documents from SST (General/Science) for promotion as Subject Specialist (IT) and to consider them according to rules and further directions to respondents to amend or interpret the promotion rules by providing ample opportunity to SST (General/Science) as Subject Specialist. Admittedly, the petitioners are civil servants and the matter in question relates to the terms and conditions of their service and in such like cases this Court has no jurisdiction to issue directions for the promotion of petitioners or direction for amendment in the Rules in question. In this respect, reliance is placed on the cases of Province of Punjab, Communication and Works Department, Lahore. Vs. Liaquat Ali Bukhari (1998 PLC(CS) 901), Muhammad Zafar Ali. Vs. Federation of Pakistan through Secretary Establishment, Islamabad (2018 PLC(CS) 116) and Hafiz Muhammad Ilyas. Vs. Government of Khyber Pakhtunkhwa (2018 PLC(CS) N 40). The Honourable Supreme Court of Pakistan in the case of Government of Khyber Pakhtunkhwa, Vs. Hayat Hussain (2016 SCMR 1021) held that:-

"No vested right of a government employee was involved in the matter of promotion or the rules determining their eligibility or fitness. High Court had no jurisdiction by means of constitution petition to strike down such rules."

MISSILE
22-02
EXAMINOR
J. Shauhar High Co.
D.I. Khan Bt

BEFORE PESHAWAR HIGH COURT BENCH AT D.I.KHAN

Writ No. 817 of 2018.



1. Abdul Ahad R/O Ghulam Muhammad R/O Ahmad D.I.Khan currently working at GCMS no. D.I.Khan as SST (Physics & Mathematics).
2. Kalim Ullah S/O Rehmat Ullah Cas Baluch R/O Mohallah Ahmad Saib Eid Gah D.I.Khan currently working as ASDEO SST (General) chudwan circle District D.I.Khan.
3. Dr. M. Naseem Ullah S/O Fateh Ullah R/O Gillani Town near Wensum College D.I.Khan Currently posted at GHS Haji Mora as SST (General), (Phd).
4. Ghulam Abbas S/O Ghulam Qasim R/O Village Mialy Tehsil Parova D.I.Khan currently posted at GHS Mangal SST (General).
5. Abdul Ghafoor S/O Ghulam Nahi Khan R/O Village Lunda Para Tehsil Parova D.I.Khan currently posted at GHS Wanda Sheru D.I.Khan SST (General).
6. Muhammad Imran S/O Haji Ismail R/O Parova D.I.Khan currently posted at GMS Malaikhi SST (General).
7. Muhammad Bilal S/O Malik Muhammad Amir R/O Currently posted at GHS SST (General) Gara Rahid D.I.Khan.
8. Rafi Ullah S/O Hameed Ullah R/O Kot Nawaz District Tank, currently working as ASDEO Education Office Tank SST (General).
9. Asmat Ullah S/O Rahmat Ullah R/O Shadi Khel Village Daraki District Tank SST (General).
10. Muhammad Farooq S/O Rahim Baksh R/O Village Chah Khan Wala Tehsil Parova D.I.Khan currently posted at GHS Parova as SST (Physics & Mathematics).

VERSUS

ATTENTION
EXAMINOR
Peshawar High Court
D.I.Khan

1. Govt of Khyber Pakhtunkhwa through Secretary (K&S) Education Peshawar.
2. Govt of Khyber Pakhtunkhwa through Secretary Establishment Department Peshawar.
3. Govt of Khyber Pakhtunkhwa through Secretary Finance Department Peshawar.
4. Govt of Khyber Pakhtunkhwa through Secretary Law Peshawar.
5. Director General (K&S) Education Khyber Pakhtunkhwa Peshawar.
6. Deputy Director EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
7. District Education Officer (Male) D.I.Khan.
8. District Account Officer D.I.Khan.

**PETITION UNDER ARTICLE 199 OF CONSTITUTION
OF THE ISLAMIC REPUBLIC OF PAKISTAN, 1973.**

Respectfully Sheweth:

The facts leading rise to present writ petition in brief are:

1. That petitioner having degree of Bachelor of Science, appointed as Secondary School Teacher (General/Science). Copy of academic qualifications and notifications are annexure A & B.
2. That petitioner also acquired the degree of Master of Computer Science. Copy of Certificates is annexure C.
3. That respondent vide notification no. SO (PE) 4-5/SSRC/Meeting/2013/Teaching Cadre dated 24th of July 2014 approved some amendments regarding promotion of Secondary School Teacher BPS-16 to subject specialist BPS-17, according to which 50% promotion should be made on the basis of seniority cum fitness for the relevant subject amongst the SST with at least 5 year service along with 2nd class Master Degree or 4 year BS degree in the relevant subject. Copy of Notification is Annexure D.
4. That after the amendments some promotions were made but Secondary School Teacher (General/Science) were ignored reason best known to the respondents. In the

11/05/14
 12-02-19
 EXAMINOR
 Peshawar High Court
 D.I.Khan District

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

APPEAL NO: _____ OF 20 19

Muzaffer Said

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt.

(RESPONDENT)
(DEFENDANT)

I/We Appellant.

Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. 17/2/2023

M. Zaid
CLIENT + Muzaffer Said

ACCEPTED

NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT
(BC-10-0853)
(15401-0705985-5)

K
KAMRAN KHAN

Umar Farooq
UMAR FAROOQ MOHMAND

Waleed Adnan
WALEED ADNAN

&

Muhammad Ayub
MUHAMMAD AYUB
ADVOCATES

OFFICE:

Flat No. (TF) 291-292 3rd Floor,
Deans Trade Centre, Peshawar Cantt.
(0311-9314232)

بعدالت ادوس لٹریجنول حکومت پاکستان

2 پنجاب ایبل اسٹریٹ
بنام حکومت

منظر سپر

ادوس ایبل

موزجہ
مقدمہ
دعوی
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی دکل کاروائی متعلقہ /
 آن مقام ~~ادوس لٹریجنول~~ کیلئے ~~سارٹ اٹھراخان ایبوسٹ~~ سے تعلقہ /
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب و صوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
 وکیل صاحب کو راضی نامہ کرنے و تقریر نمائتہ فیصلہ بر حلقہ دیئے جواب دہی اور اقبال دعوی اور
 باسورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضعی دعوی اور درخواست ہر قسم کی تصدیق
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا ایبل کی برادگی اور منسوخی
 نیز دائر کرنے ایبل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
 کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ یا اختیارات حاصل ہوں گے اور اس کا ساختہ
 پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جائزہ التوائے مقدمہ کے سبب سے ہوگا۔
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
 مذکور کریں۔ لہذا نکالت نامہ لکھدیا کہ سندر ہے۔

المرتوم 26 ماہ جولائی 2014

کے لئے منظور ہے۔
 Attested
 Accepted

مقام ادوس لٹریجنول

کے لئے منظور ہے۔

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



C.M No. ____/2020

In

Service Appeal No. ~~1815~~/2019

Muzafar SaidPetitioner

Vs.

Govt of KPK & Others.....Respondents

Subject:- **APPLICATION FOR EARLY HEARING IN THE
CAPTIONED CASE ALONG WITH CONNECTED
PETITIONS.**

Respectfully Sheweth:-

The petitioner humbly submits as under:-

- 1- That the captioned connected Service Appeals is pending adjudication before this August Tribunal for 07.07.2020.
- 2- That the respondents issued notification dated 08.06.2020, and it is very necessary to restrain them from acting upon the same, that's why the petitioners preferred stay applications in the same.
- 3- That the date given is too late and the petitioner request this Hon'ble Tribunal that as such the noted date may please be expedited and be fixed at earliest.

It is therefore, respectfully prayed that on acceptance of this application the above titled case may kindly be fixed at earliest to meet the ends of justice.

*shall remain posted
to the date already fixed.*
Through
[Signature]
26/6

Petitioners

[Signature]
Saadat Ullah Khan Tangi

Advocate High Court

Peshawar

Cell#0331-5030566

Dated:-23.06.2020

①

BEFORE THE LEARNED SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR



C.M No. _____/2020

In

Service Appeal No. _____/_____

Muzafar Said..Petitioner

Vs

Govt of KPK & Others.....Respondents

Subject:- **APPLICATION FOR SUSPENSION OF NOTIFICATION**
NO.332-52 SS (IT) PROMOTION DATED PESHAWAR
THE 08/06/2020, TILL THE FINAL DISPOSAL OF THE
SERVICE APPEAL.

*Put up to the
court
month
18/6/20*

Respectfully Sheweth:-

Reader The petitioner humbly submits as under:-

- 1- That the captioned Service Appeal is pending adjudication before this August Tribunal for 07.07.2020.
- 2- That the Directorate of E&SE KPK issued notification No.332-52 SS (IT) Promotion dated Peshawar the 08.06.2020 inviting application/documents for Promotion of SST (IT) BS-16 to SS (IT) BS-17 Regular. (**Attested Copy of Notification is attached as Annexure "A"**).
- 3- That vide the said notification, the respondents intends to deprive the petitioner from his valuable rights of promotion, that's why the petitioner seeks indulgence of this Hon'ble Court for restraining the respondents from acting upon the same till the final disposal of the Service Appeal on the following grounds inter alia.

GROUND:-

- A- That the impugned notification is against the law on the point and violative of fundamental rights of the petitioner as well as against promotion Rules 2014 & Minutes of SSRC dated 10.08.2017.

2

B- That the petitioner has good prima facie case, Balance of Convenience lies in favour of petitioner & if impugned notification is not suspended the petitioner would face irreparable loss as the petitioner is discriminated in the matter.

It is, therefore, prayed that on acceptance of the instant application, notification impugned above may kindly be suspended till final disposal of the main service appeal.

Petitioner



Through

Saadat Ullah Khan Tangi

Advocate High Court

Peshawar

Cell#0331-5030566

Dated:-15.06.2020

3

BEFORE THE LEARNED SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

C.M No. _____/2020

In

Service Appeal No. _____/_____

Muzafar SaidPetitioner

Vs

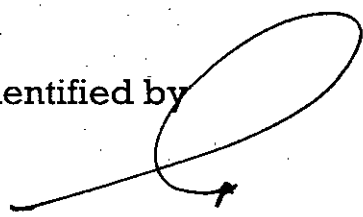
Govt of KPK & Others.....Respondents

AFFIDAVIT

I, Muzafar Said S/O Hazrat Yousaf (Petitioner), do hereby solemnly affirm and declare on oath that the contents of this **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


DEPONENT

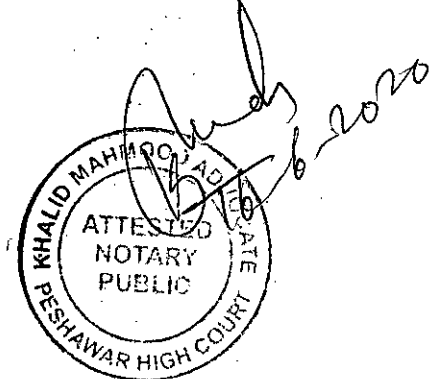


Identified by 

Saadat Ullah Khan Tangi

Advocate High Court

Peshawar





Directorate of Elementary & Secondary Education Khyber
Pakhtunkhwa

No. 379-12 SS (IT) Promotions

Dated Peshawar the: 8/16/2020

4 "A"

To

1. All the District Education Officers (Male) Khyber Pakhtunkhwa
2. All the District Education Officers (Male) Newly Merged District in Khyber Pakhtunkhwa

Subject: **SUBMISSION OF APPLICATION/DOCUMENTS FOR PROMOTION OF
SST (IT) BS-16 TO THE POST OF SS (IT) BS-17 REGULAR**

Memo:

I am directed to refer to the subject cited above and to state that the Elementary & Secondary Education (E&SE) Khyber Pakhtunkhwa intends the promotions of SSTs(IT) (Male) BS-16 to the post of Subject Specialist (SS-IT) BS-17 (Regular), hence you are directed to inform the SSTs (IT) concerned having regular appointments up to 2014 against SST (IT) post in your respective districts to provide the applications alongwith relevant documents as per detail given below for the purpose of promotions to SS (IT) post on the following format:

S#	Sen#	Name	Qual:	Div in master	Prof: Qual:	DOB	Domicile	DO 1 st appt	DO of appt as regular	Contact#	Remarks if any

Note: - the relevant documents will be consisting of:

1. Bio Data/CNIC
2. 1st App: order/Contract Order
3. Regular App: as SST IT BS-16
4. Service Certificate
5. Non involvement certificate (duly countersigned by DEO)
6. Last 5 Years results
7. Pay slip
8. synopsis
9. ACRs (from 1st app: till 2019) Synopsis / ACRs should be submitted in separate file and documents in separate file, ACR and synopsis should be handed over with the conveying letter from concerned D.E.O to ACR branch.
10. All certificate/degrees with DMCs (duly attested)
11. Domicile
12. Information as per format referred to the above may be provided in hard.
13. Applications/Documents/ information should be reached to this directorate within (10) days after the issuance of this letter.
14. Candidates having 3rd division in Mater are not eligible.

DEPUTY DIRECTOR (ESTAB)

Directorate of Elementary & Secondary
Education Khyber Pakhtunkhwa

8/16/2020

Endst.No. _____ Dated _____/2020

Copy of the above is forwarded to the: -

1. PA to Secretary to Govt: E& SE Deptt Khyber Pakhtunkhwa
2. PA to Director E&SE Khyber Pakhtunkhwa Peshawar

DEPUTY DIRECTOR (ESTAB)

Directorate of Elementary & Secondary
Education Khyber Pakhtunkhwa