

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

8
Service Appeal # 1017/2023

Mr. Amir Zeb, SS-Economics (BPS-18).....Appellant

VERSUS

Chief Secretary, Govt: of Khyber Pakhtunkhwa & others.....Respondents.

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Despondent

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

Service Appeal # 101⁸/2023

Mr. Amir Zeb, SS-Economics (BPS-18).....Appellant

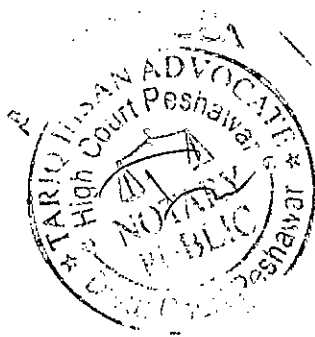
VERSUS

Govt. of Khyber Pakhtunkhwa & others..... Respondents

AFFIDAVIT

I, Mr. Amjad Ali, Section Officer (Litigation-II) Elementary & Secondary Education, Department do hereby solemnly affirm and declare that the contents of the accompanying para-wise comments, submitted by the respondents, are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

It is further, stated on oath that in this appeal the answering Respondents have neither been placed ex-parte nor has their defense been struck off.



DEPONENT

Mr. Amjad Ali
Section Officer (Lit-II)
E&SE Department Peshawar



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9211128

AUTHORITY LETTER

It is certified that **Mr. Fahim Ullah, Legal Representative (Litigation-II)** Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa, Peshawar is hereby authorized to submit parawise comments on behalf of Secretary Elementary & Secondary Education Department Peshawar in Service Appeal No. 1017/2023 Case Titled **Mr. Amir Zeb, SS-Economics (BPS-18)**, vs Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar.

Mr. Amjad Ali
Section Officer (Lit-II)
E&SE Department Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

In Service Appeal No. 1018/2023

Mr. Amir Zeb, SS-Economics (BPS-18) & Others.....Appellant.

VERSUS

Chief Secretary to Govt of KPK Peshawar..... Respondents.

PARAWISE COMMENTS ON BEHALF OF THE RESPONDENTS NOS. 1, 2 & 3.

Respectfully Sheweth,

Preliminary Objections:

1. The appellant has not come to this Tribunal with clean hands.
2. The appellant is not an aggrieved person nor has any locus standi to file the present appeal.
3. That the appellant has concealed material facts from this Tribunal.
4. That the appellant is estopped by his own conduct to file the present appeal.
5. That the present appeal is against the prevailing law and rules.
6. That the appellant is not entitled for any relief, he has sought from this Honorable Tribunal.
7. That the present appeal is liable to be dismissed being devoid of any merits.
8. That the present appeal is barred by law and hence not maintainable.

Khyber Pakhtunkhwa
Service Tribunal

Date 28/2/23

Dated 2-11-22

On Facts

1. Pertains to record.
2. Incorrect hence denied. The seniority list issued by the Elementary & Secondary Education Department on 01-01-2019 was revised & updated seniority list of SS/HM (Male) BPS-17 which was at the then prepared with full caution and care. It is now not an issue nor has been challenged before this Honorable Tribunal in the present appeal in hand. This issue has become past and closed transaction. Needless to mention here that the appellant has only prayed for and against the Notification dated 13-12-2022, wherein he illegally demanding promotion from 17-05-2019 alongwith back benefits. It is also pertinent to mention here that the appellant is not entitled for the relief sought in the appeal because of the fact that promotion is given to any Civil Servant on the criteria of seniority cum fitness. And the appellant was much junior in the seniority list, therefore he was legally and rightly promoted on 13-12-2022 on the availability of vacant post in light of the seniority list stood on 31-07-2022.

Pertains to record. However again stated that the same is a past and closed transaction.

It is given in the above para.

04 as stated is incorrect. As per seniority list 01-01-2019 PSB was held on

in which all the 105 Officers who was recommended for promotion was

only at the first round some 44 Officer were considered fit for promotion

and accordingly by PSB.


5. Para No 05 is again stated incorrect. The department/respondent has acted in accordance with law and forwarded the case of promotion of different Officers to PSB who returned the same for updating and revising the seniority list.
6. Pertains to record
7. Pertains to record.
8. Pertains to record.
9. In response of Para-09, it is stated that on the direction of Honorable Supreme Court of Pakistan a final seniority list of SS/HM (BPS-17) was prepared and placed before PSB which was considered for promotion on 13-12-2022.
10. Pertains to record, however the claim of the appellant alleging his promotion & back benefits from 28-05-2019 is against the law and facts. Therefore not permissible by law.
11. Incorrect, as replied above.
12. Para-12 alongwith grounds of appeal is incorrect, hence denied. The appellant has got no cause of action to file instant appeal.

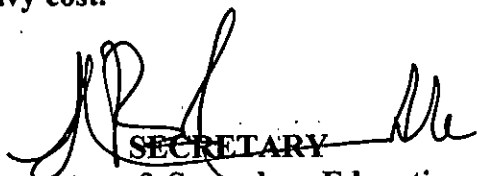
On Grounds:

- A. Incorrect hence denied. The appellant is legally and rightly promoted on 13-12-2022 on the availability of vacant post in light of the seniority list stood on 31-07-2022.
- B. Incorrect hence denied. The seniority list issued by the E&SE Department on 01-01-2019 was revised and updated seniority list of SS/HM (BPS-17) Male which was at the then prepared with full caution care and responsibility. It is now not an issue nor has been challenged before this Honorable Tribunal in the present appeal in hand. This issue has become a past and closed transaction. The only prayed for modification of notification 13-12-2022 wherein he illegally demanding promotion from 17-05-2019 alongwith back benefit. The appellant is not entitled for any relief being not an aggrieved person is junior in seniority list at the then. The notification dated 13-12-2022 is in accordance with law and in light of seniority list stood on 31-07-2022. As per seniority list of 01-01-2019 PSB was held on 17-05-2019 in which 105 Officers were recommended out of which 44 Officers were found fit for promotion and they were right promoted. Thereafter as per direction of the August Supreme Court of Pakistan a final seniority list were prepare on 13-12-2022 and placed before PSB.
- C. Incorrect as per seniority list on 01-01-2019 PSB was held on 17-05-2019 in which all the 105 Officers who was recommended for promotion was thoroughly checked and the first round some 44 Officers were considered fit for promotion by PSB.
- D. Incorrect hence denied. The appellant was much junior in the seniority list dated 01-01-2019. The detail reply with explanation is given above.
- E. Incorrect hence denied. The appellant is not an aggrieved person. In fact the appellant was very much junior in the seniority list and he is not entitled for any promotion from 28-05-2019. The appellant was rightly promoted on 13-12-2022 on availability of post.
- F. Incorrect and just repetition of wrong facts by appellant which is denied and fully replied in the above para's.

- G. Incorrect hence denied. The appellant is not entitled to any relief he has claimed in the appeal.
- H. Incorrect and denied. The detail reply has been given in the above para's. The appeal in hand is liable to be dismissed summarily.
- I. Para-I is incorrect, hence denied. The appellant is not entitled for any relief what so ever claim in the appeal.
- J. Incorrect, there is no irreparable loss to appellant. The appellant is just wasting the precious time of this Honorable Tribunal and pressurizing the respondents for illegal service benefits.
- K. In response of Para-K the respondents seeks for permission to advance other facts and material before the tribunal at the time of arguments.

It is therefore, most humbly requested that the appeal in hands being devoids of any merits may kindly be dismissed with heavy cost.


DIRECTOR
Elementary & Secondary Education,
(Respondent No.3)


SECRETARY
Elementary & Secondary Education,
Department (Respondent No. 1 & 2)

REVISED & UPDATED (FINAL) SENIORITY LIST OF SUBJECT SPECIALISTS AND MASTERS MALE (B-17) OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA PESHAWAR AS STOOD ON 31-12-2019

Sl. No.	Name of Officers with Qualification	D.O Birth	Domicile	Date of 1st Entry in Edu	Regular appointment/promotion to			Designation/Place of Posting	Remarks
					Reg. Date	Grade	Method of Recruitment		
1	MR. AMJAD ALI M.A.B.E.D	10.02.1972	MARDAN	28.05.1999	24.5.2018	17	BY promotion	SS English GHSS Mohabat Abad Mardan	SO(SM)E&SED/2-1/2011/promotion BS-18 to BS-17
2	Nazeeb Ahmad Jan s/o Fazal Aziz SS (Urdu)	01.04.1977	Swat	17/07/2008	17/07/2008	17	D/Selection	SS GHSS Bakara Swat	SO(S)3-2/2008/SS(II) dt 17.07.2008 (Merit 02/2007)
3	Muhammad Amin S/O Ghulam Hassan SS Physics	05.10.78	D.I.Khan	08.04.1999	25.02.2011	17	D/Selection	SS GHSS Yark D.I.Khan	SO(SM)E&SED/3-2/2011/SS Physics (Male) dated 25.02.2011 (Merit 01/2009)
4	Muhammad Shakeel S/o Ghulam Farid SS Chemistry	28.02.82	D.I.Khan	18.09.2010	18.09.2010	17	D/Selection	SS GHSS Ramak D.I.Khan	SO(S)3-2/2004/(Male) dated 18.09.2010 (Merit 01/2009)
5	Muhammad Khan S/o Amir Nawab SS Economics	20.04.78	Mardan	12.01.2010	12.01.2010	17	D/Selection	SS GHSS NO.1 Mardan	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010 (Merit 01/2009)
6	Akhtar Zaman S/o Awar Ayaz Khan SS English	02.03.77	FR Bannu	24.02.2011	24.02.2011	17	D/Selection	SS FATA	SO(SM) E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010 (Merit 01/2009)
7	Heshmat Ali S/o Sufiani Roma SS Chemistry	12.04.78	Shangla	24.02.2011	24.02.2011	17	D/Selection	SS GHSS Ziarat Takash Dir (Low)	SO(SM) E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010 (Merit 01/2009)
8	Akbar Jan S/o Ahmad Jan SS English	15.08.78	Dir	18.11.2007	24.02.2011	17	D/Selection	SS GHSS Sarf Kot Haripur	SO(SM) E&SED/3-2/2010/SS-Ma cum-CMcs (Male) dated 09.01.2010 (Merit 01/2009)
9	Dakar Shah S/o Fagir Shah SS History Cum Civics	01.03.81	Haripur	15.02.2007	08.01.2011	17	D/Selection	SS GHSS Landi Kachi Kohat	SO(SM) E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010 (Merit 01/2009)
10	Muhammad Taryab S/o Muhammad Nazeem SS English	10.04.81	Peshawar	28.02.2011	24.02.2011	17	D/Selection	SS GHSS Barawal Bami Dir(U)	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010 (Merit 01/2009)
11	Imam Ullah S/o Saif ur Rehman SS Pak Study	28.04.81	Dir	11.09.2008	12.01.2010	17	D/Selection	SS GHSS Kachi Paid Khan D.I.Khan	SO(SM) E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010 (Merit 01/2009)
12	Imran Hammed S/o Abdul Hammed SS English	18.07.81	D.I.Khan	24.02.2011	24.02.2011	17	D/Selection	SS GHSS Dargal Charsadda	SO(SM) E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010 (Merit 01/2009)
13	Shah Nawaz Khan S/o Hazrat Soid SS English	03.04.82	Charsadda	01.03.2011	24.02.2011	17	D/Selection	GHSS Pindli Lalma Khyber	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010 (Merit 01/2009)
14	Muhammad Kasim Khan S/o Muhammad Hayat SS Pak Study	12.08.82	Mohmand Agency	12.01.2010	12.01.2010	17	D/Selection	GHSS Palinda Khel Bannu	SO(SM) E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010 (Merit 01/2009)
15	Muhammad Ishaq S/o Rahim Khan SS English	01.10.82	FR Bannu	24.02.2011	24.02.2011	17	D/Selection	GHSS Kotla Muhammad Khan Bannu	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010 (Merit 01/2009)
16	Heshmat Ullah Khan S/o Rasool Bahadar SS Economics	05.02.83	FR Bannu	01.02.2010	12.01.2010	17	D/Selection	SS GCET Mir Ali NWA	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010 (Merit 01/2009)
17	Saeed Ahmad S/o Ghulam Sarwar SS Pak Study	25.02.1983	NWA	02.07.2010	12.01.2010	17	D/Selection	GHSS Kalra Orakzai	SO(SM) E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010 (Merit 01/2009)
18	Tariq Ali S/o Noor Sarwar SS Economics	18.08.83	Orakzai Agency	12.01.2010	12.01.2010	17	D/Selection	SS GHSS Kadal Swat	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010 (Merit 01/2009)
19	Anwar Khan S/o Muhammad Abdus Sami SS Biology	10.03.82	Swat	24.02.2011	24.02.2011	17	D/Selection	GHSS Mandori Kohat	SO(SM) E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010 (Merit 01/2009)
20	Shah Ullah Khan S/o Hakim Khan SS Pak Study	18.01.84	Kohat	03.03.1982	12.01.2010	17	D/Selection	GHSS Tappi Karak	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010 (Merit 01/2009)
21	Muhammad Riaz S/o Amir Muhammad SS English	02.02.79	Karak	24.02.2011	24.02.2011	17	D/Selection	GHSS Hazar Khwani	SO(SM) E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010 (Merit 01/2009)
22	Ferd Ullah S/o Abdul Jabbar SS English	29.03.80	Peshawar	24.02.2011	24.02.2011	17	D/Selection	GHSS Sahra Koj Malakand	SO(SM) E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010 (Merit 01/2009)
23	Ferman Ullah S/o Hakim Ullah SS English	10.03.82	Malakand	24.02.2011	24.02.2011	17	D/Selection	GHS Koleji Manshehra	SO(SM)E&SED/3-2/2011/Various subject dated 10.01.2011 (Merit 01/2009)
24	Iqbal Ullah S/o Qazi Zauqul SS Pak Study	22.03.87	Manshehra	01.04.1988	10.01.2011	17	D/Selection	GHSS Gagra Haripur	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010 (Merit 01/2009)
25	Aziz Jan S/o Jamzain SS Pak Study	01.01.89	SWA	17.10.1989	12.01.2010	17	D/Selection	SS GHSS Chanda Khuram Karak	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010 (Merit 01/2009)
26	Qayyum Anwar S/o Khush Mir SS Pak Study	01.01.89	Karak	26.05.1988	12.01.2010	17	D/Selection	GHSS Tarzool Manshehra	SO(SM)E&SED/3-2/2011/Various subject dated 10.01.2011 (Merit 01/2009)
27	Muhammad Nasim S/o Muhammad Khan SS Maths	02.01.89	Abbottabad	07.11.1994	10.01.2011	17	D/Selection	GHSS Tappi Kanda Karak	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010 (Merit 01/2009)
28	Muhammad Zubair Khan S/o Ahmad Shah SS Pak Study	02.04.89	Karak	18.04.1982	12.01.2010	17	D/Selection	GHSS Dhokel Manshehra	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010 (Merit 01/2009)
29	Waqar Ali Shah S/o Mian Izzat Ullah SS Pak Study	18.04.89	Manshehra	21.09.1991	12.01.2010	17	D/Selection	GHSS Bagra Haripur	SO(S)3-2/2004/(Male) dated 18.08.2010 (Merit 01/2009)
30	Muhammad Akhtar Khan S/o M Farid Khan SS Chemistry	02.02.70	Haripur	01.02.2002	18.08.2010	17	D/Selection	GHSS Ayun Chitral	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010 (Merit 01/2009)
31	Zahir Iqbal S/o Noor Muhammad SS Pak Study	13.08.70	Haripur	01.07.1997	12.01.2010	17	D/Selection	RUTE Bannu	SO(SM) E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010 (Merit 01/2009)
32	Ahsan Ullah S/o Alta Ullah SS Pak Study	03.03.72	Chitral	01.04.1992	12.01.2010	17	D/Selection	SS GHSS Parhina Manshehra	SO(S)3-2/2004/(Male) dated 18.08.2010 (Merit 01/2009)
33	Muhammad Nauman Shabbir S/o Shabbir Ahmad SS English	27.02.73	Bannu	24.02.2011	24.02.2011	17	D/Selection	SS GHSS Sherk Hoth Mardan	SO(SM) E&SED/3-2/2011/Various subject dated 10.01.2011 (Merit 01/2009)
34	Nadeem Akbar S/o Ali Akbar Khan SS Urdu	03.04.74	Abbottabad	18.09.2010	18.09.2010	17	D/Selection	GSURHSS No.1 Charsadda	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010 (Merit 01/2009)
35	Byed Shah Hassan S/o Byed Anwar Hassan SS English	07.04.75	Mardan	01.11.2005	08.01.2011	17	D/Selection	SS GHSS Doblin Swabi	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010 (Merit 01/2009)
36	Shabir Muhammad S/o Mustafa SS Pak Study	10.08.75	Battagram	28.08.1995	10.01.2011	17	D/Selection	SS GHSS No.3 Mechan Khel Lalki Marwat	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010 (Merit 01/2009)
37	Shakeeb Ahmad S/o Sami Ullah SS English	18.11.75	Charsadda	01.03.2011	24.02.2011	17	D/Selection	working as SDEO (R) Judge Tor Gar	SO(SM)E&SED/3-2/2011/Various subject dated 10.01.2011 (Merit 01/2009)
38	Shah Hassan S/o Shah Hussain SS Pak Study	10.08.78	Mardan	21.7.2003	12.01.2010	17	D/Selection	SS GHSS Sher Garh Mardan	SO(SM) E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010 (Merit 01/2009)
39	Asif Ali S/o Muhammad Akbar SS Pak Study	02.08.78	Swabi	12.01.2010	12.01.2010	17	D/Selection	SS GHSS Doblin Swabi	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010 (Merit 01/2009)
40	Abdul Majeed s/o Shadi Khan	20.1.1977	Lakki Marwat	04/12/2003	24/2/2011	17	D/Selection	SS GHSS No.3 Mechan Khel Lalki Marwat	SO(S) E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010 (Merit 01/2009)
41	Muhammad Ishaq S/o Shahid Akbar SS English	01.03.78	Tank	02.11.2005	24.02.2011	17	D/Selection	SS GHSS Gul Imam Tank	SO(SM) E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010 (Merit 01/2009)
42	Riaz Iqbal S/o Jehanzeb SS English	08.03.79	Swabi	24.02.2011	24.02.2011	17	D/Selection	SS GHSS Kaku Khan Swabi	SO(SM) E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010 (Merit 01/2009)
43	Ashfaq Ahmad S/o Abdul Saleem SS Chemistry	11.04.79	Manshehra	18.08.2010	18.08.2010	17	D/Selection	working as Assistant Controller BISE Abbottabad	SO(S)3-2/2004/(Male) dated 10.08.2010 (Merit 01/2009)

Section Officer (SM)
Elementary & Secondary
Education Department (KP)

Section Officer (SM)
Elementary & Secondary
Education Department (KP)

Deputy Director (Esstt.)
Elementary & Secondary
Education Department
Khyber Pakhtunkhwa Peshawar

Sl. No.	Name of Officers with Qualification	D.O Birth	Domicle	Date of 1st Entry In Edu	Regular appointment/promotion to			Designation/Place of Posting	Remarks
					Reg. Date	Grade	Method of Recruitment		
44	Ferd Ullah Shah S/o Syed Aslam SS Statistics	15.04.79	FR Bannu	18.08.2010	18.08.2010	17	D/Selectee	SS GHSS Bangi Khan Khujart Bannu	SO(S)3-2/2004(Male) dated 18.08.2010(Merit 01/2009)
45	Syed Muhammad Azmir S/o S Muhammad Younas SS English	31.12.1980	Mardan	01/09/2010	24.02.2011	17	D/Selectee	SS GHSS Rashakai Nowshera	SO(S/M) EASED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
46	Khwairat Shah S/o Gul Badshah SS English	03.01.82	Orakzai Agency	14.02.2011	14.02.2011	17	D/Selectee	GHSS Mandoor, Kohat	FS/E/100-83/1724-32 dated 14.02.2011(Merit 01/2009)
47	Sher Ayaz Khan s/o Akbar Razi SS Statistics	22.05.82	Chitral	18.08.2010	18.08.2010	17	D/Selectee	GHSS Ayun Chirah	SO(S)3-2/2004(Male) dated 18.08.2010(Merit 01/2009)
48	Wajid Ali S/o Ali Akbar SS Statistics	21.05.83	Mansehra	01.08.2010	18.08.2010	17	D/Selectee	SS GHSS Ghaz Habibullah Mansehra	SO(S)3-2/2004(Male) dated 18.08.2010(Merit 01/2009)
49	Sajid Ghaffar S/o Muhammad Ghaffar SS English	01.03.78	Karak	25.02.2011	24.02.2011	17	D/Selectee	SS GHSS Dabul Lawqhar Karak	SO(S/M) EASED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
50	Dr.Fazil Rabbil B/o Mir Muhammad P,Id SS Statistics	13.03.73	Nowshera	13.12.1998	18.08.2010	17	D/Selectee	SS GHSS Mansabdar Swabi	SO(S)3-2/2004(Male) dated 18.08.2010(Merit 01/2009)
51	Ahmad Ali S/o Mumtaz Ali SS English	15.05.73	Swabi	24.02.2011	24.02.2011	17	D/Selectee	GHSS Wazir Bani Peshawar	SO(S/M) EASED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
52	Ali Muhammad S/o Muhammad Yaqoob SS His curri Chics	08.01.74	Mansehra	24.02.2011	24.02.2011	17	D/Selectee	GHS Kafa Mansehra	SO(S/M) EASED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
53	Shahid Ur Rahman S/o Abdul Ahmad SS Economics	12.12.74	Chitral	10.04.1999	12.01.2010	17	D/Selectee	GHSS Barzan Ower Chitral	SO(S) EASE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
54	Ahmad Khan S/o Muhammad Rasool Khan SS English	02.04.78	Bannu	24.02.2011	24.02.2011	17	D/Selectee	GHSS Ahmad Umar Khan Bannu	SO(S/M) EASED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
55	Muhammad Siddique S/o Yaqub SS English	08.10.75	Abbottabad	24.02.2011	24.02.2011	17	D/Selectee	SS GHSS Dabla Abbottabad	SO(S/M) EASED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
56	Amir Zab S/o Jamshaid Khan SS Economics	01.01.77	Swat	12.01.2010	12.01.2010	17	D/Selectee	GHSS Batul Khazakhela Swat	SO(S) EASE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
57	Zamrad Khan S/o Lal Sadi SS Economics	10.03.77	Malakand	12.01.2010	12.01.2010	17	D/Selectee	GHSS Malakand	SO(S) EASE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
58	Muhammad Karim S/o Sahib Gul SS English	25.03.77	FR Bannu	24.02.2011	24.02.2011	17	D/Selectee	GHSS Dama Bannu	SO(S/M) EASED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
59	Nasib Khan S/o Daray Khan SS Statistics	03.09.77	Lahki Marwat	17.08.2010	18.08.2010	17	D/Selectee	GHSS Gani Sher Dad Peshawar	SO(S)3-2/2004(Male) dated 18.08.2010(Merit 01/2009)
60	Muhammad Shah S/o Shari Khan SS English	21.02.78	Mardan	24.02.2011	24.02.2011	17	D/Selectee	GHSS Bakhtawal Mardan	SO(S/M) EASED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
61	Gohar Zaman S/o Rafiq Uz Zaman SS Statistics	08.03.78	D.K.Khan	18.08.2010	18.08.2010	17	D/Selectee	GHSS Khirah Di Khan	SO(S)3-2/2004(Male) dated 18.08.2010(Merit 01/2009)
62	Wali Dad Khan S/o Zardad Khan SS Statistics	11.09.78	Khyber Agency	17.08.2010	18.08.2010	17	D/Selectee	GHSS Muzazil	SO(S)3-2/2004(Male) dated 18.08.2010(Merit 01/2009)
63	Iqbal Sher S/o Muhammad Ghaffar Khan SS English	02.11.81	Swat	24.02.2011	24.02.2011	17	D/Selectee	GHSS Chirah Swat	SO(S/M) EASED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
64	Amir Hamza S/o Hazrat Usman M,gs SS English	20.01.82	Swat	24.02.2011	24.02.2011	17	D/Selectee	GHSS Khwaja Khela Swat	SO(S/M) EASED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
65	Muhammad Rizwan S/o Muhammad Sadique SS English	05.04.82	Haripur	24.02.2011	24.02.2011	17	D/Selectee	GMHSS No.1 Haripur	SO(S/M) EASED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
66	Mehmood ur Rahman s/o Hafez Muhammad Idriss SS Biology	12.02.72	Haripur	18.08.2010	18.08.2010	17	D/Selectee	GHSS Hagma Abbottabad	SO(S)3-2/2004(Male) dated 18.08.2010(Merit 01/2009)
67	Tarq Ahmad S/o Ahmad Sher SS Economics	01.01.80	Shangha	02.12.2008	10.01.2011	17	D/Selectee	GHSS Sandovi, Shangha	SO(S/M)EASED/3-2/2011/Various subject dated 10.01.2011(Merit 01/2009)
68	Saif Ur Rahman S/o Muhammad Ashraf SS Chemistry	11.01.78	Abbottabad	01.11.2005	24.02.2011	17	D/Selectee	GHSS Sandi Saleh Haripur	SO(S/M) EASED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
69	Mubeenad Iyaa S/o Muhammad Akram SS English	20.04.79	Mohmand Agency	24.02.2011	24.02.2011	17	D/Selectee	GHSS Mazior Abad, Takhtbad	SO(S/M) EASED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
70	Shamshad Khan S/o Fatah Rahim SS Physics	25.01.80	Mardan	24.02.2011	23.02.2011	17	D/Selectee	GHSS Shariq Noll Mardan	SO(S/M)EASED/3-2/2011/ SS Physics(Male) dated 23.02.2011(Merit 01/2009)
71	Ahmad Ijaz Mustafa S/o Qazi Syed Mukhtar Ullah SS Economics	29.01.73	Mansehra	29.12.1994	12.01.2010	17	D/Selectee	SS GHSS Karol Mansehra	SO(S) EASE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
72	Saleh Shah MA BEd	03.02.1961	Khyber Agency	05/03/1979	20/01/2010	17	By Promotion	HM B-17 service placed at the disposal of DE FATA	SO(PE)2-6/EASE/DPC Meeting/10; dated 20.01.2010
73	Habib ur Rehman BSc BEd	01.02.1962	FR Bannu	15/02/1984	27/03/2010	17	By Promotion	HM B-17 service placed at the disposal of DE FATA	SO(PE)2-8/EASE/DPC Meeting/2010; dated 27.03.2010
74	Joher Khan MA BEd	03.07.1981	SWA	18/04/1985	27/03/2010	17	By Promotion	HM B-17 service placed at the disposal of DE FATA	SO(PE)2-6/EASE/DPC Meeting/2010; dated 27.03.2010
75	Aziz Ullah Khan BA BEd	08.04.1960	SWA	11/04/1978	27/03/2010	17	By Promotion	HM B-17 service placed at the disposal of DE FATA	SO(PE)2-8/EASE/DPC Meeting/2010; dated 27.03.2010
76	Muhammad Hanif MA BEd	14.03.1983	Mardan	18/04/1985	27/03/2010	17	By Promotion	HM GHS Samandar Ghaz NSR	SO(PE)2-8/EASE/DPC Meeting/2010; dated 27.03.2010
77	Shahid Gul BSc BEd	15.07.1980	Chitral	01/10/1984	27/03/2010	17	By Promotion	HM GHS Sunzal Pawan	SO(PE)2-8/EASE/DPC Meeting/2010; dated 27.03.2010
78	Salam Khan BSc BEd	02.02.1981	Mardan	04/10/1984	27/03/2010	17	By Promotion	HM GHS Jarroba NSR	SO(PE)2-8/EASE/DPC Meeting/2010; dated 27.03.2010
79	Rasool Khan MA BEd	01.01.1981	Karak	04/05/1981	27/03/2010	17	By Promotion	HM GHS Tatar Kbel Karak	SO(PE)2-8/EASE/DPC Meeting/2010; dated 27.03.2010
80	Ferd Ullah BA BEd	08.01.1980	D.L.Khan	30/10/1985	27/03/2010	17	By Promotion	HM GHS Mandira Qalan DiK	SO(PE)2-8/EASE/DPC Meeting/2010; dated 27.03.2010
81	Fazl ur Rehman BA BEd	25.06.1984	D.L.Khan	11/12/1985	27/03/2010	17	By Promotion	HM GHS Takwar DiK	SO(PE)2-8/EASE/DPC Meeting/2010; dated 27.03.2010
82	Abdur Rahim BSc BEd	01.01.1981	D.L.Khan	19/10/1985	27/03/2010	17	By Promotion	HM GHS Bardi Kbel Kohat	SO(PE)2-8/EASE/DPC Meeting/2010; dated 27.03.2010
83	Saleh Din MA BEd	01.04.1960	Bannu	01/12/1983	27/03/2010	17	By Promotion	HM GHS Kotla Geedar Kalo Lakki	SO(PE)2-8/EASE/DPC Meeting/2010; dated 27.03.2010
84	Zahid Khan MA BEd	15.03.1961	Khyber Agency	07/04/1979	27/03/2010	17	By Promotion	HM B-17 service placed at the disposal of DE FATA	SO(PE)2-8/EASE/DPC Meeting/2010; dated 27.03.2010

Section Officer (HR)
Elementary & Secondary
Education Department (K.P)

Section Officer (Schools)
Elementary & Secondary
Education Department
Civil Servant

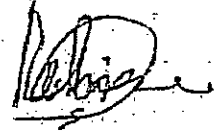
Deputy Director (ESII)
Elementary & Secondary
Education
Khyber Pakhtunkhwa

S.#	Name of Officers with Qualification	D.O Birth	Domicile	Date of 1st Entry In Edu	Regular appointment/promotion to			Designation/Place of Posting	Remarks
					Reg. Date	Grade	Method of Recruitment		
3577	RAHMAN UL HAQ	1.1.1978	Bannu	10.03.2005	12.02.2020	17	BY promotion	SS (Economics) BS-17 GHSS Lodhi Khel Hangu	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17 (teaching Cadre) Dated 12.02.2020
3578	SAJEED GUL	9.3.1974	Mardan	2.9.2010	12.02.2020	17	BY promotion	SS (Economics) BS-17 GHSS Garyala Mardan	SO(SM)E&SED/3-3/2020/promotion SST BS-16 to SS BS-17 (teaching Cadre) Dated 12.02.2020

CERTIFICATE

It is certified that the above seniority list is:

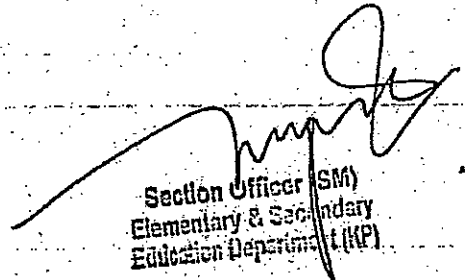
1. Widely circulated
2. Undisputed/Uncontroversial
3. No legislation is pending/involved




Deputy Director (Estab)
Directorate of Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Deputy Director (Estt.)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

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Section Officer (SM)
Elementary & Secondary
Education Department (HP)

Section Officer (Schools)
Elementary & Secondary Education
Government
Khyber Pakhtunkhwa Peshawar