

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal # 1019/2023

Mr. Syed Muhammad Aamir, SS-English (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 # 1019/2023

Mr. Syed Muhammad Aamir, SS-English (BPS-18).....Appellant

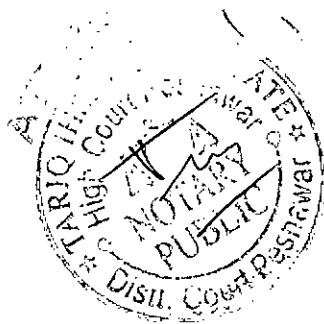
VERSUS

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. 1019/2023 Case Titled Mr. Syed Muhammad Aamir, SS-English (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. 1019/2023

Syed Muhammad Aamir, SS-English (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
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Date 2-11-23

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.
3. Pertains to record. However again stated that the same is a past and closed transaction. Detail is given in the above para.
4. Para No. 04 as stated is incorrect. As per seniority list 01-01-2019 PSB was held on 17-05-2019 in which all the 105 Officers who was recommended for promotion was checked thoroughly at the first round some 44 Officer were considered fit for promotion who were promoted 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 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 MALEED	10.02.1972	MARDAN	25.05.1999	24.5.2018	17	BY promotion	SS English GHSS Mohabat Abad Mardan	SO(SME&SED/2-1/2918/promotion BS-16 to BS-17
2	Nazeeb Ahmad Jan s/o Fazal Aziz SS Urdu	01.04.1977	Swat	17/07/2005	17/07/2005	17	O/Selection	SS GHSS Bakara Gwal	SO(S)3-2/2008/SS(M) dt 17.07.2009 (Merit 02/2007)
3	Muhammad Amin B/O Ghulam Hassan SS Physics	05.10.78	D.I.Khan	08.04.1999	26.02.2011	17	O/Selection	SS GHSS Yark D.I.Khan	SO(SM)E&SED/3-2/2011/SS Physics(Ar) 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	O/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	O/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	O/Selection	SS GHSS Bafhan Shargola	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	Shargola	24.02.2011	24.02.2011	17	O/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	16.08.78	Dir	18.11.2007	24.02.2011	17	O/Selection	SS GHSS Sarf Kot Haripur	SO(SM)E&SED/3-2/2010/SS-14 cum CMcu(Male) dated 09.01.2010(Merit 01/2009)
9	Dakar Shah S/o Fakhir Shah SS History Cum Civics	01.03.81	Haripur	15.02.2007	06.01.2011	17	O/Selection	SS GHSS Landi Kachi Kohat	SO(S)E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
10	Muhammad Tayyab S/o Muhammad Naeem SS English	10.04.81	Peshawar	28.02.2011	24.02.2011	17	O/Selection	SS GHSS Barawal Bandi Dir(U)	SO(S)E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
11	Inam Ullah S/o Saif ur Rahman SS Pak Study	28.04.81	Dir	11.09.2008	12.01.2010	17	O/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 Hameed S/o Abdul Hameed SS English	10.07.81	D.I.Khan	24.02.2011	24.02.2011	17	O/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 Saliq SS English	03.04.82	Charsadda	01.03.2011	24.02.2011	17	O/Selection	GHSS Patind Laima Khyber	SO(S)E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
14	Muhammad Kashif Khan S/o Muhammad Hayat SS Pak Study	12.09.82	Mohmand Agency	12.01.2010	12.01.2010	17	O/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	O/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	O/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	02.02.2010	12.01.2010	17	O/Selection	GHSS Kalya 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	O/Selection	SS GHSS Kabal Swat	SO(S)E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
19	Anwar Khan S/o Muhammad Abbas Sami SS Biology	10.03.82	Swat	24.02.2011	24.02.2011	17	O/Selection	GHSS Mandori Kohat	SO(S)E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
20	Shan Ullah Khan S/o Hakim Khan SS Pak Study	18.01.84	Kohat	03.03.1982	12.01.2010	17	O/Selection	GHSS Tappi Karak Karak	SO(SM)E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
21	Muhammad Riaz S/o Amir Muhammad SS English	02.02.79	Karak	24.02.2011	24.02.2011	17	O/Selection	GHSS Hazar Khyber	SO(SM)E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
22	Fazil Ullah S/o Abdul Jabbar SS English	29.03.80	Peshawar	24.02.2011	24.02.2011	17	O/Selection	GHSS Sahi Kot 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	O/Selection	GNS Koleka Manshehra	SO(SM)E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
24	Ibad Ullah S/o Qazi Ziauddin SS Pak Study	22.03.87	Manshehra	01.04.1986	10.01.2011	17	O/Selection	GHSS Garga Haripur	SO(S)E&SE/3-2/2009/Recruitment SS(Male) dated 10.01.2011(Merit 01/2009)
25	Azam Jan S/o Jamzain SS Pak Study	01.01.89	SWA	17.10.1989	12.01.2010	17	O/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	28.05.1989	12.01.2010	17	O/Selection	GHSS Terzool 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	O/Selection	GHSS Terzool Manshehra	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	18.06.1992	12.01.2010	17	O/Selection	GHSS Dhodol Manshehra	SO(S)E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
29	Wahid Ali Shah S/o Mian Izzat Ullah SS Pak Study	10.04.89	Manshehra	21.09.1999	12.01.2010	17	O/Selection	GHSS Bagra Haripur	SO(S)3-2/2004/(Male) dated 18.09.2010(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	O/Selection	GHSS Ayun Chitral	SO(S)E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
31	Zuber Iqbal S/o Noor Muhammad SS Pak Study	13.06.70	Haripur	01.07.1997	12.01.2010	17	O/Selection	RITE 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	O/Selection	SS GHSS Parhama Manshehra	SO(S)3-2/2004/(Male) dated 18.09.2010(Merit 01/2009)
33	Muhammad Nauman Shabbir S/o Shabbir Ahmad SS English	27.02.73	Bannu	24.02.2011	24.02.2011	17	O/Selection	SS GHSS Sherid 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 Biology	03.04.74	Abbottabad	15.08.2010	18.09.2010	17	O/Selection	working as SDEO (F) Judo Tor Ghar	SO(SM)E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
35	Byad Shah Hussain S/o Byad Anwar Hussain SS English	07.04.75	Mardan	01.11.2005	08.01.2011	17	O/Selection	SS GHSS Sher Khan Swabi	SO(S)E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
36	Shah Muhammad S/o Mustafa SS Pak Study	10.06.75	Bannu	28.08.1995	10.01.2011	17	O/Selection	SS GHSS Doblan Swabi	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	18.11.78	Charsadda	01.03.2011	24.02.2011	17	O/Selection	SS GHSS Na.J Mechan Khel Lakkh Marwat	SO(S)E&SE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
38	Shah Hassan S/o Shah Hussain SS Pak Study	10.06.78	Mardan	21.7.2003	12.01.2010	17	O/Selection	SS GHSS Gul Imari Terh	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 Afsar SS Pak Study	02.09.78	Swabi	12.01.2010	12.01.2010	17	O/Selection	SS GHSS Kani Khan Swabi	SO(SM)E&SED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
40	Abdul Majeed s/o Shadi Khan	20.1.1977	Lakkh Marwat	04/12/2003	24/2/2011	17	O/Selection	working as Assistant Controller BISE Abbottabad	SO(S)3-2/2004/(Male) dated 10.06.2010(Merit 01/2009)
41	Muhammad Ishaq S/o Shabbir Akbar SS English	01.03.78	Terh	02.11.2005	24.02.2011	17	O/Selection		
42	Riaz Iqbal S/o Jehanzeb SS English	08.03.78	Swabi	24.02.2011	24.02.2011	17	O/Selection		
43	Asfaq Ahmad S/o Abdul Salam SS Chemistry	11.04.78	Manshehra	18.08.2010	18.08.2010	17	O/Selection		

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

Section Officer (Schools)
Education Department
Civil Sectt: Khyber Pakhtunkhwa

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

(10/15)
 Sectt
Educ
Civil Sectt: Khyber Pakhtunkhwa

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	15.04.78	FR Bannu	16.08.2010	18.08.2010	17	D/Selection	SS GHSS Bang Khan Khujart Bannu	SO(S)3-2/2004/(Male) dated 16.08.2010(Merit 01/2009)
45	Syed Muhammad Admirk S/o S Muhammad Younas SS English	31.12.1980	Mardan	01/09/2010	24.02.2011	17	D/Selection	SS GHSS Pashakai Nowshera	SO(S/M) EASED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
45	Karamat Shah S/o Gul Badshah SS English	03.01.82	Orpical Agency	14.02.2011	14.02.2011	17	D/Selection	GHSS Mandoori 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/Selection	GHSS Ayun Chitral	SO(S)3-2/2004/(Male) dated 18.08.2010(Merit 01/2009)
49	Wajid Ali S/o Ar Arbaz SS Statistics	21.05.83	Mansehra	01.09.2010	18.08.2010	17	D/Selection	SS GHSS Ghani Habbubillah 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/Selection	SS GHSS Dabi Lawatkar Karak	SO(S/M) EASED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
50	Dr.Fazil Rabbil S/o Mr Muhammad P.Hd SS Statistics	13.03.73	Nowshera	13.12.1999	18.08.2010	17	D/Selection	SS GHSS Mansabdar Swabi	SO(S)3-2/2004/(Male) dated 18.08.2010(Merit 01/2009)
51	Azmad Ali S/o Mumtaz Ali SS English	15.05.73	Swabi	24.02.2011	24.02.2011	17	D/Selection	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 Hs cum CMCS	06.01.74	Mansehra	24.02.2011	24.02.2011	17	D/Selection	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 Ahad SS Economics	12.12.74	Chitral	10.04.1999	12.01.2010	17	D/Selection	GHSS Barzan Omir Chitral	SO(S) EASE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
54	Anjad Khan S/o Muhammad Rasool Khan SS English	02.04.78	Bannu	24.02.2011	24.02.2011	17	D/Selection	GHSS Amard Umer 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/Selection	SS GHSS Danda Abbottabad	SO(S/M) EASED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
55	Amir Zab S/o Jamshaid Khan SS Economics	01.01.77	Swat	12.01.2010	12.01.2010	17	D/Selection	GHSS Baral Khazirchala Swat	SO(S) EASE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
57	Zamrad Khan S/o Lal Said SS Economics	10.03.77	Malakand	12.01.2010	12.01.2010	17	D/Selection	GHSS Malakand	SO(S) EASE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
58	Muhammad Karim S/o Sehb Gul SS English	25.05.77	FR Bannu	24.02.2011	24.02.2011	17	D/Selection	GHSS Dama Bannu	SO(S/M) EASED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
58	Nash Khan S/o Daray Khan SS Statistics	03.09.77	Lahul Mandral	17.08.2010	18.08.2010	17	D/Selection	GHSS Gani Sher Dad Peshawar	SO(S)3-2/2004/(Male) dated 18.08.2010(Merit 01/2009)
60	Muhammad Shah S/o Sheril Khan SS English	21.02.78	Mardan	24.02.2011	24.02.2011	17	D/Selection	GHSS Bakhtal 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 Rafi Uz Zaman SS Statistics	06.03.78	D.L.Khan	18.08.2010	18.08.2010	17	D/Selection	GHSS Khopri Ol Khan	SO(S)3-2/2004/(Male) dated 18.08.2010(Merit 01/2009)
62	Wall Dad Khan S/o Zardad Khan SS Statistics	11.09.78	Khyber Agency	17.08.2010	18.08.2010	17	D/Selection	GHSS Musatal	SO(S)3-2/2004/(Male) dated 18.08.2010(Merit 01/2009)
63	Iqbal Sher S/o Muhammad Ghafoor Khan SS English	02.11.81	Swat	24.02.2011	24.02.2011	17	D/Selection	GHSS Chamatal Swat	SO(S/M) EASED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
64	Amir Harun S/o Huzrat Usman M.B.S.S English	20.01.82	Swat	24.02.2011	24.02.2011	17	D/Selection	GHSS Kharwa Khata 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 Siddique SS English	04.04.82	Haripur	24.02.2011	24.02.2011	17	D/Selection	GCMHS 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 Hafiz Muhammad Idrees SS Biology	12.02.72	Haripur	18.08.2010	18.08.2010	17	D/Selection	GHSS Hagne Abbottabad	SO(S)3-2/2004/(Male) dated 18.08.2010(Merit 01/2009)
67	Tariq Ahmad S/o Ahmad Sher SS Economics	01.01.80	Shangha	02.12.2008	10.01.2011	17	D/Selection	GHSS Sandori Shangha	SO(S/M)EASED/3-2/2011/Various subject dated 10.01.2011(Merit 01/2009)
68	Saf Ur Rahman S/o Muhammad Ashraf SS Chemistry	11.01.78	Abbottabad	01.11.2005	24.02.2011	17	D/Selection	GHSS Saral Saleh Haripur	SO(S/M) EASED/3-2/2011/Various SS (BS-17) (Male) dated 23.12.2010(Merit 01/2009)
69	Muhammad Ilyas S/o Muhammad Akram SS English	20.04.79	Mohmand Agency	24.02.2011	24.02.2011	17	D/Selection	GHSS Mandor Abad Takhtai	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	24.02.2011	17	D/Selection	GHSS Shanti Hoi Mardan	SO(S/M)EASED/3-2/2011/ SS Physics(Male) dated 24.02.2011(Merit 01/2009)
71	Man Jaz Mustafa S/o Qazi Syed Mukhtar Ullah SS Economics	28.01.73	Mansehra	28.12.1994	12.01.2010	17	D/Selection	SS GHSS Karori Mansehra	SO(S) EASE/3-2/2009/Recruitment SS(Male) dated 12.01.2010(Merit 01/2009)
72	Saleh Shah MA BEd	03.02.1981	Khyber Agency	05/03/1978	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	01.02.1982	FR Bannu	13/02/1984	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
74	Johar Khan MA BEd	03.07.1981	SWA	18/04/1983	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	Adz Ullah Khan BA BEd	08.04.1980	SWA	11/04/1978	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
76	Muhammad Hanif MA BEd	14.03.1983	Mardan	18/04/1985	27/03/2010	17	By Promotion	HM GHS Samandar Ghari NSR	SO(PE)2-6/EASE/DPC Meeting/2010: dated 27.03.2010
77	Sharif Gul BSc BEd	15.07.1983	Charsadda	01/10/1984	27/03/2010	17	By Promotion	HM GHS Surzal Pawan	SO(PE)2-6/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 Jirocha NSR	SO(PE)2-6/EASE/DPC Meeting/2010: dated 27.03.2010
78	Rezaul Khan MA BEd	01.01.1981	Karak	04/05/1981	27/03/2010	17	By Promotion	HM GHS Tatar Khel Karak	SO(PE)2-6/EASE/DPC Meeting/2010: dated 27.03.2010
80	Ferd Ullah BA BEd	06.01.1980	D.U.Khan	30/10/1985	27/03/2010	17	By Promotion	HM GHS Mandra Qalan Dik	SO(PE)2-6/EASE/DPC Meeting/2010: dated 27.03.2010
81	Fazl ur Rahman BA BEd	23.08.1984	D.L.Khan	11/12/1985	27/03/2010	17	By Promotion	HM GHS Takwar Dik	SO(PE)2-6/EASE/DPC Meeting/2010: dated 27.03.2010
82	Abdur Rahim BSc BEd	01.01.1981	D.L.Khan	11/10/1985	27/03/2010	17	By Promotion	HM GHS Bazid Khel Kohat	SO(PE)2-6/EASE/DPC Meeting/2010: dated 27.03.2010
83	Salahud Din MA BEd	01.08.1980	Bannu	01/12/1983	27/03/2010	17	By Promotion	HM GHS Kotla Geedar Kale Lakki	SO(PE)2-6/EASE/DPC Meeting/2010: dated 27.03.2010
84	Zahid Khan MA BEd	15.03.1981	Khyber Agency	07/04/1978	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

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

Section Officer (S.O.)
Education Department
Civil Section

Deputy Director (S.O.)
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 Leshi Khai Hangu	SO(SM)E&SEDA-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&SEDA-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 (KPI)

~~Section Officer (Schools)
Elementary & Secondary Education
Civil Secretariat Peshawar~~