

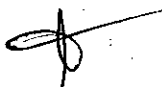
APPEAL No. 420/2016
Zahoor Khan vs Govt

27.02.2017

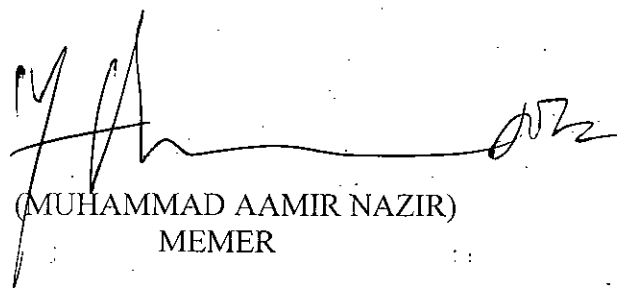
Counsel for the appellants and Addl. AG for respondents present. Counsel for the appellants requested for withdrawal of the instant appeal. In this respect his signature also obtained in the margin of the order sheet. Request accepted and the appeal in hand is therefore, dismissed as withdrawn. File be consigned to the record room.

ANNOUNCED:

27.02.2017



(AHMAD HASSAN)
MEMBER



(MUHAMMAD AAMIR NAZIR)
MEMBER

420/16

22.11.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was appointed as PTC (BPS-7) on 04.09.1996 and was promoted to BPS-12 on 01.10.2007. He further argued that vide notification dated 31.05.2013 colleagues of the appellant were promoted from BPS-12 to BPS-14 but he being senior to those was ignored in spite of his eligibility for promotion to BPS-14. The learned counsel further argued that non-consideration of the appellant for promotion to BPS-14 was due to non-availability of F.A certificate with the Bio-Data of the appellant at the relevant time of consideration of promotion to BPS-14 and added further that there was no fault on the part of the appellant as his higher qualification of B.A and B.Ed etc were duly mentioned in the seniority list at serial No. 2208 column No. 1 in respect of the appellant. He further argued that the departmental appeal dated 01.01.2016 followed by another application dated 25.02.2016 was not responded by the respondents, hence the instant service appeal.

Points urged needs consideration. The appeal is admitted for regular hearing subject to legal objections at a later stage and subject to deposit of security and process fee within 10 days where-after notices be issued to the respondents for written reply/comments for 05.01.2017 before S.B.

Appellant Deposited
Security & Process Fee

(ABDUL LATIF)
MEMBER

05.01.2017

Appellant in person and Mr. Raham Taj, ADO alongwith Assistant AG for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing on 27.02.2017.

(MUHAMMAD AAMIR NAZIR)
MEMBER

06.10.2016

Mr. Amir Ali Khan, Advocate for the appellant and Additional AG for respondents present. Fresh Wakalatnama on behalf of the appellant submitted and requested for adjournment. Request accepted. To come up for preliminary hearing on 19.10.2016 before S.B.


(PIR BAKHSH SHAH)
MEMBER

19.10.2016

Counsel for the appellant and Assistant AG for respondents present. Learned counsel for the appellant requested for adjournment. Adjourned for preliminary hearing to 01.11.2016 before S.B.


(ABDUL LATIF)
MEMBER

01.11.2016

Counsel for the appellant seeks adjournment as he intends to submit certain documents which shall be submitted in office within a week. To come up for preliminary hearing on 22.11.2016 before S.B.


Chairman

09.08.2016

None for the appellant present. The appeal be relisted for

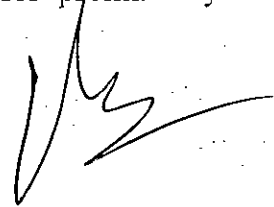
01.09.2016.


Member

J


01.09.2016

Clerk to counsel for the appellant present. Requested for adjournment. To come up for preliminary hearing on 20.9.2016 before S.B.


Member

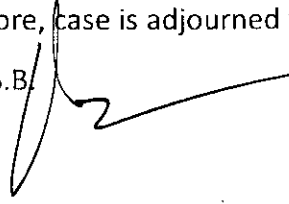
20.09.2016

Mr. Ibrar, Advocate, Junior to counsel for the appellant present and requested for adjournment. Adjournment granted. To come up for preliminary hearing on 06.10.2016.


Member

19.05.2016

Appellant in person present. Due to strike of the Bar learned counsel for the appellant is not available today before the Court, therefore, case is adjourned for preliminary hearing to 6.6.2016 before S.B.

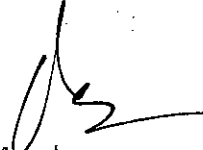


Member

06.06.2016

Counsel for appellant present. Preliminary arguments heard and case file perused. Through the instant appeal, the appellant has impugned order dated 13.12.2013 vide which the appellant was not given his due promotion from BS-12 to BS-14. Against the impugned order the appellant filed departmental appeal on 1.1.2016 which was not decided within statutory time, hence the present appeal.

Since the appellant has not annexed the impugned order dated 13.12.2013 and stated that the same is an ^{Assession} position of respondent-department similarly, the appellant is challenging the order of the year 2013 which required further clarification, therefore, pre-admission notice be issued to the respondent-department to produce the record on or before the next date of hearing. To come up for further proceedings on 11.7.2016.



Member

11.07.2016

Agent to counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Preliminary arguments could not be heard due to strike of the bar. To come up for further proceedings/record 9-8-16.



Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 420/2016


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	19.04.2016	<p>The appeal of Mr. Zahoor Khan resubmitted today by Mr. Asif Ali Shah 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;"><i>[Signature]</i> REGISTRAR</p>
2	25-04-2016	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>27-04-2016</u></p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p>
	27.4.2016	<p>Clerk of counsel for the appellant present. Seeks adjournment due to strike of the bar. Adjourned for preliminary hearing to 19.5.2016 before S.B.</p> <p style="text-align: right;"><i>[Signature]</i> Chairman</p> <p style="text-align: center;">11-2-16</p>

The appeal of Mr. Zahoor Khan son of Habib Khan PST GPS Peshtakhara Payan Peshawar received to-day i.e. on 01.04.2016 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellants.
- 2- Affidavit may be got attested by the Oath Commissioner.
- 3- Address of respondent No.4 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 4- In the memo of appeal many places have been left blank which may be filled up.
- ⑤ Copy of impugned order is not attached with the appeal which may be placed on it.
- 6- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

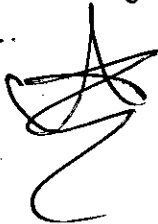
No. 525 /S.T,

Dt. 01/4 /2016


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.


Mr. Asif Ali Shah Adv. Pesh.

The case may kindly be submitted before the Hon'ble Bench.


Advocate

R/S/M

The respondents were requested time and again to provide the impugned order seniority list but they are reluctant to give a copy to appellants, hence the date is mentioned but not annexed ^{copy} due to reason above, hence the appeal is filed before the Tribunal.


Advocate

BEFORE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No. 420 /2016

ZahoorKhan.....Appellant


Versus

Govt. of K.P.K.& Others..... Respondents

INDEX

S.No.	Particulars	Annexure	P.No
1	Memo of Appeal		1-4
2	Affidavit		5
3	Address of the Parties		6-A
4	Copy of CNIC is attached as	A	6-A
5	Copy of Service record is	B	7-13
6	Copy of DPC is	C	14-15
7	Copies of application /departmental appeal are	D,E and F	16-18
8	Copy of application	G	19
9	Court Fee and Wakalt Name		

Appellant
Through:



ASIF ALI SHAH

Advocates High Court,
Peshawar
Cell No.0333-9006806

Dated: 30-3-2016

/

**BEFORE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

Appeal No. 420 /2016

**N.W.F. Province
Service Tribunal**
Diary No. 319
Dated 01-4-2016

**Zahoor Khan S/o Habib Khan R/o Village Selman Kheel
PO.Box Badhber , PST-BPS 12 at Govt Primary school
Peshtakhara Payan ,Peshawar**

_____ Appellant

VERSUS

1. Govt. of K.P.K., through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
2. Director Elementary & Secondary Education K.P.K., Dabgari Garden Peshawar.
3. District Education Officer (Male) District Peshawar.
4. Deputy District Officer (M) Peshawar, ^{Edu.} *J-hashtragi, Peshawar*

_____ Respondents

**APPEAL U/S 4 NWFP SERVICE TRIBUNAL
ACT 1974 AGAINST THE ORDER OF
RESPONDENT NO. 3 AND 4 /DPC DATED:
13/12/2013 WHEREBY THE APPELLANT HAS
NOT BEEN GIVEN HIS DUE POSITION FOR
PROMOTION FROM BPS-12 TO BPS-14 AND NOT
PROMOTED .**

PRAYER:

IT IS, HUMBLY PRAYED THAT ON ACCEPTANCE OF THIS APPEAL THE RESPONDENTS MAY KINDLY BE DIRECTED TO THE LAW AND RULES POLICY.

FURTHER THE RESPONDENTS MAY KINDLY BE DIRECTED THAT A DPC MAY KINDLY BE

re-submitted to-day
and filed.

[Signature]
Registrar

HOLD FOR THE APPELLANT AND KINDLY MAY BE GIVEN his DUE POSITION FOR PROMOTION AND THE APPELLANT MAY BE PROMOTED from BPS-12 to BPS-14 FROM 2013 WITH ALL BACK BENEFITS.

RESPECTFULLY SHEWETH

FACTS:-

1. That the Appellant is belong to a respectable family and permanent resident of District Peshawar. **(Copy of CNIC is attached as Annexure 'A')**
2. That the Appellant is appointed as Primary School Teacher and is serving as PS Teachers from his appointment till date and performing his duty in the Govt Primary school Peshtakhara Payan, Peshawar to the entire satisfaction of high-up and of students **(Copy of Service record is annexure -B)**
3. That Departmental promotion committee meeting was conducted by respondents wherein the appellant was refused to be promoted with remarks that FA entry was not recorded. **(Copy of DPC is Annexure C).**
4. That the appellant moved application/ departmental appeals from time to time for promotion of appellant from BPS-12 to BPS-14 but the respondents keep mum and even not bother to decide the application/ departmental appeal **.(Copies of application /departmental appeal are Annexure , D, E and F)**
5. That the Appellant is the most senior in the PSTs having requisite qualification and and entitled for promotion from BPS-12 to BPS-14 also moved application to respondent No.3 under right to information Act but futile. **(Copy of application is annexure G)**
3. That the Appellant also filed so many representations / applications for redressal of their grievances, which was processed but till date the response is awaited.
4. That the appellant now approaches this Honorable Tribunal against the above said order on the following grounds amongst the others:-

Grounds:

- A. That the Appellant have excellent service record which clearly shows that the Appellant has been performed his

service regularly and during the said period his moral character was too excellent, hence, not holding DPC for the promotion for the Appellant by the Respondents is a great discrimination and against the rules and regulation.

- B. That the Appellant is very hardworking and punctual in his duties, therefore, no complaint received by the Respondents No. 3 & 4 against the Appellant but the Respondents unlawfully creating hurdles in the way of promotion of the Appellant, which is against the law and fundamental rights of the Appellant.
- C. That the Appellant is the most senior in his colleagues and according to rules and procedures he is entitle for promotion, but the acts of respondents not considering in the DPC meeting dated: and not holding a separate DPC for the promotion of those PSTs who having qualification like Appellant, are illegal and unlawful act, which has fallen the Appellant as well as his family in a great mental crises, so needs interference of this Court on the quota reservation.
- D. That this conduct of the Respondents has not only enhanced the agonies of the Appellant, but it is also an example of misconduct, inefficiency, negligence, and mismanagement on the part of the Respondents which needs to be judicially handled and curbed, in order to save the poor masses and provide them an opportunity to lead their lives freely and with the enjoyment of all of their fundamental rights, which are provided for them in the Constitution of Islamic Republic of Pakistan 1973.
- E. That unless and until the proper Orders / direction of appellant promotion are not issued, serious miscarriage of justice would be caused to the Appellant and the appellant would be suffered by the Orders of the Respondents which are fanciful, suffering from patent perversity and material irregularity, needs correction from this Hon'ble Court.
- F. That the Respondents erroneously exercised their discretion against judicial principle and not considered the Appellant for promotion hence direction for arranging DPC for Appellant and the orders of the promotion of the Appellant according to rules would be just and proper.
- G. That the Appellant have got a constitutional right to be treated as according to the law. The appellant have the right to be considered for promotion to BPS-14 while the respondents by an unlawful discriminatory act ignored the Appellant and give opportunity to their blue eyed for promotion, which is against the norms of justice.
- H. That the Appellant has been discriminated without any just and reasonable cause and thereby offending the fundamental rights of the Appellant as provided by the constitution of 1973.

- I. That the Appellant, after running from pillar to post but of no avail, finally decided to approach this Hon'ble Court for seeking justice as no other adequate and efficacious remedy is available to them.
- J. That the Appellant reserves rights to advance other points at the time of hearing this petition.

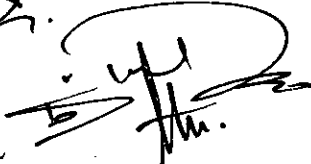
IT IS, THEREFORE, PRAYED THAT IN VIEW OF THE ABOVE SUBMISSIONS THE INSTANT APPEAL MAY GRACIOUSLY BE ACCEPTED AS PRAYED FOR HEREIN ABOVE.


APPELLANT

Through

ASIF ALI SHAH 

&

BILAL KHAN KHALIL
Advocate High Court, 

VERIFICATION:

It is verified that (as per information given me by my client) all the contents of the instant appeal are true and correct and nothing has been concealed intentionally from this Hon'ble Tribunal.

Advocate 

Note:

That no such like petition / Appeal on this subject matter has earlier been filed before this Hon'ble Tribunal.

Advocate 

5

BEFORE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No. _____/2016

Zahoor Khan _____ Appellant

VERSUS

Govt. of K.P.K. & Others _____ Respondents

Affidavit

It is hereby solemnly affirm and declare on oath that all the contents of the instant appeal are true and correct to the best of my Knowledge and belief and nothing has been concealed intentionally from this Honorable Court.

12/11/16




Deponent

*as per instructions
of my client.*

**BEFORE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

Appeal No. _____/2016

Zahoor Khan.....Appellant

Versus

Govt. of K.P.K.& Others..... Respondents

ADDRESSES OF THE PARTIES

APPELLANT

**Zahoor Khan S/o Habib Khan R/o Village Selman Kheel
PO.Box Badhber , PST-BPS 12 at Govt Primary school
Peshtakhara Payan ,Peshawar**

RESPONDENTS

1. Govt. of K.P.K., through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
2. Director Elementary & Secondary Education K.P.K., Dabgari Garden Peshawar.
3. District Education Officer (Male) District Peshawar.
4. Deputy District Officer (M) Peshawar.



APPELLANT

Through:

Asif Ali Shah
Advocates High Court,
Peshawar

The entries in this page should be renewed or re-attested at least every five years and the Signature to lines 9 and 10 should be dated.

1. Name MR. ZAHOOR KHAN.

2. Race Afghan.

3. Residence DIST. PESHAWAR / NAKHSHA.

Moh. Khan Khel, Vill. Subman Khel P.O. Badak, Teh. Dist. Peshawar

4. Father's name and residence .. Malik Habib Khan.

5. Date of birth by Christian era as nearly as can be ascertained .. (8-11-1977) (8th November N.H. Seventy three)

6. Exact height by measurement .. ~~5-6~~ 5-6


7. Personal marks for identification .. Nil

8. Left hand thumb and Finger impression of (non-gazetted) officer

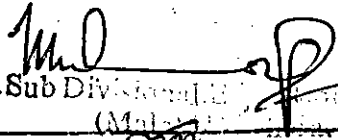
ATTESTED

Little Finger.  Ring Finger 

Middle Finger.  Fore Finger 

Thumb. 

9. Signature of Government servant TAL 

10. Signature and designation of the Head of the Office, or other Attesting Officer.  Sub Divisional Officer

(For use in Police Department only).

Date of Birth verified from SSC
 passed their SSC Examination from the
 BISE Peshawar under Roll
 No. 13567 in 1992 and marks
 obtained 392/850 and placed
 grade 'D'

Verification Roll No. _____ dated _____
 Sub Divisional Education Officer received back
 (Male) Nowshera.

passed FA Examination from the BISE
 Peshawar under roll number 420/1100 in 1994 and placed
 grade 'F'

Qualification _____ Date (Male) Nowshera _____
 Sub Divisional Education Officer

English _____ First Arts _____
 Pashtu _____
 Urdu _____
 Plan-drawing _____
 Finger print _____
 Drill instructing _____
 Court duties _____
 Reserve duties _____

_____ B. Ed exam from _____
 Islamabad under _____
 Roll No. L656684 in session _____
 Spring 2005 marks obtained _____
 520/900 N.O.D 28-1-2006.

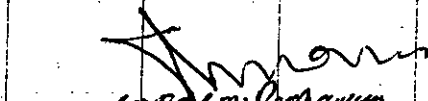
_____ Pleadership examination _____
 Training School Final examination _____
 Other qualifications -- _____
 Sub Divisional Education Officer
 (Male) Nowshera.

ATTESTED

Deputy Distt. Officer
 (M) Primary Peshawar
 Amir Nawaz *

N.B. Name to be drawn under the qualification possessed.

1 Name of Post	2 Whether substantive or officiating and whether permanent or temporary	3 If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive Post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of Appointment	8 Signature of Government
DTC							
C.S.R. BPS No. 7 Rs. 1420-81-2695							
SPS AC Centra		Temp	1480/p.m.			4-9-96	TAL ML
SPS Lahi Khel Nowshera.		Temp	1723/p.m.			1-12-97	TAL ML
SPS Dg Bazid Khel		Temp	1723/p.m.			2-11-98	TAL ML
do			1804/p.m.			12-1-99	TAL ML
<u>Revised Entries</u>							
Allow one advance increment late E 11/5/99 and three advance increment on B.A. No. 13-5-99							
do	81+1804		1885/p.m.			11-5-99	TAL ML
do	243+1885		2128/p.m.			13-5-99	TAL ML


 S. B. Siddiqui
 Secy

1	2	3	4	5	6	7	8
Name of Post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government
PTC			1480	87	3060		
Sps Bazidkhal		R 2209/- p.m				1/12/99	JAL/OK
do		R 2290/- p.m				1/12/2000	JAL/OK
PTC		RPS No 7 = 2220 - 120 = 5820					JAL/OK
Sps Bazidkhal		R 3490 + 130 = 3520/- p.m				1/12/2001	JAL/OK
do		R 3660/- p.m				1/12/2002	JAL/OK
do							JAL/OK
do			R 3780/-			1/12/2003	JAL/OK
do							JAL/OK
do							JAL/OK
do							JAL/OK
do							JAL/OK
do							JAL/OK
do							JAL/OK
do							JAL/OK
do							JAL/OK
do							JAL/OK
do							JAL/OK
do							JAL/OK

ATTESTED

10	11	12	13		14	15
			Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitale to another Government		
D. E. O. 99/1976 Nowshera.	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer Nowshera		Period	Signature of the head of the office or other attesting officer	Reference to as recorded punishment or censure, or praise of the Government Serv
				Government to which debitale		
D. E. O. 200/98 Nowshera.	Reason of termination (such as promotion, transfer, dismissal, etc.) transfer to D.O. (M) Nowshera.	Signature of the head of the office or other attesting Officer Nowshera			Appointed as DTC teacher vide D.E.O (M) No. 4899-4902 dated 3-9-1996.	
S. III 129 4/7/98					Sub Divisional Education Officer (Male) Nowshera.	
					Service Verified	
					w.e.f. 4-9-96 to 30-11-96 from the acq; Roll record of this office.	
					Transfer vide D.P.S.D No. 44237-41/20/98 from Nowshera.	
					Service Verified	
					w.e.f. 1-12-96 to 30-11-98 from the acq; Roll record of this office.	

Pay for the month of 12/98 and 1/99 drawn manually while pay for the month of 2/99 drawn through computer in 2/99 paid in 3/99.

TRW 356
1994
Allowed 3 adv in court on BA and one on CT vide D.P.S.D No. 549-50 dt 25/9/98. Drawn diff of 1954 and 7 1/2 1934/56 to complete
11/11/98 w.e.f. 13/98 to 31/98
D.D. 15/11/98

ATTESTED

10	11	12	13		14	15
			Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitible to another Government		
				Period	Government to which debitible	
D.D.O (M/P) EDU; PESHAWAR.	30 ⁶ 2002	DDO (M/P) EDU; PESHAWAR				Period B.A. Economics from Peshawar University under E/No 257. Session 1998. Hold certificate of B.A. passed on 17/5/99
D.D.O (M/P) EDU; PESHAWAR.	30 ⁶ Scale Revised	D.D.O (M/P) EDU; PESHAWAR.				8000
D.D.O (M/P) EDU; PESHAWAR.	30 ⁶ 2002	D.D.O (M/P) EDU; PESHAWAR.				Period of General with 2/10 28/35. Hold certificate 203 out of 1200. Passed on 11/5/99
D.D.O (M/P) EDU; PESHAWAR.	30 ¹¹ 03					8100 CAS/1000
<p>(2001) Office of the Accountant General N. W. F. P. Peshawar. Pay Fixed in the revised basic pay scale 2001 of Rs. 2220-120-5820 (3-7) at Rs. 3540/2 P.M.W.E.F. 1-12-2001 with next increment on 1-12-2002</p>						Addressed reference number on 27 and 28-11-94 vide DDO CP No 549-50 dated 25/9/99 w.e.f-11-5-99 on B.W. 25-13-5-99 Sub Div Edu officer under calling
						I Mr. Zahoor Khan die CAS, Baid Uhel is given under calling that any overpayment due to me should be cleared and pay/ pension granted to Teacher. Attached
						Sub Division officer

ATTESTED

Services Verified w.e.f. 2/12/02 from the acquittance roll & other record kept in this office

D.D.O (M/P)
EDU; PESHAWAR;

10	11	12	13		14	15
			Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitible to another Government		

Signature of the head of the office or other attesting Officer

Signature of the head of the office or other attesting officer

Reference to or recorded punisher or censure, or reward or praise of the Government Serv

24 Period Government to which debitible

TR-18/11

Refunded Rs. 1090/- deducted in 9/2005 CA for 6,748/2005

Service verified 30.11.03

18/11/06

District Accounts Officer, Deshwar

ATTESTED

S#	Circle	School Name	UC No. and name in which school situated	Teacher Name	Father Name	Domicile	Acad Qual	BA Divi	Prof Qualification	Prof qualification other than PTC	DOB	App: in Educa; Depart	D/O Regular Apptt:	DATE OF T/O/C/ ON PRESENT POST/ Peshawar	D/O/Passing PTC	DATE OF Consideratn.	Remarks		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
2667	H/Aba d	Achini Payan	81/Sufaid dheri	Saidan shah	Rahim Shah	Pesh	FA		PTC		11/10/1974	12/02/2000	18/02/2000	18/02/2000	13/05/1997	18/02/2000			
2668	H/Aba d	Achini Payan	81/Sufaid dheri	Afsar Ali	Khan Zali	Pesh	MA	2nd	PTC		01/02/1980	20/11/2004	22/11/2004	22/11/2004	25/04/2000	22/11/2004			
2834	H/Aba d	Achini Payan	81/Sufaid dheri	Khaliq uz Zaman	Shah Zaman	Pesh	BA	2nd	PTC	B.Ed	02/02/1975	13/01/2007	16/01/2007	16/01/2007	01/09/2006	16/01/2007			
2274	H/Aba d	Agriculture Colony	36/University town	Fazale Rehman	Bakht Rawan	Pesh	MA	2nd	PTC	B.Ed	25/12/1972	15/05/1999	15/05/1999	15/05/1999	25/05/1996	15/05/1999			
2813	H/Aba d	Agriculture Colony	36/University town	Imran Khan Khalil	Noor Akbar	Pesh	MA	2nd	PTC	DPE	28/03/1985	13/01/2007	15/01/2007	15/01/2007	30/11/2006	15/01/2007			
2531	H/Aba d	Badezai	Regi	Filhall	Tehmash Khan	Pesh	MA	2nd	PTC		03/02/1971	12/11/2004	20/11/2004	20/11/2004	19/01/2002	20/11/2004			
2586	H/Aba d	Badezai	Regi	Mazhar Ali	Sabz Ali	Pesh	BA	2nd	PTC		17/10/1977	12/11/2004	20/11/2004	20/11/2004	31/03/2002	20/11/2004			
3232	H/Aba d	Badezai	Regi	Muhammad Ali	Humayun Naseer	Pesh	MA	2nd	PTC	B.Ed	04/04/1984	10/05/2010	12/05/2010	12/05/2010	20/09/2007	12/05/2010			
2718	H/Aba d	Bara Bazar	Achini bala	Mehruban Shah	Mutabar Khan	Pesh	MA	2nd	PTC	B.Ed	01/01/1975	13/01/2007	13/01/2007	13/01/2007	27/02/1998	13/01/2007			
2711	H/Aba d	Behari Colony	38/Tehkal Payan	Lal Zada	Khan Zarin	Dir lower	BA	2nd	PTC		25/05/1976	31/03/2004	01/04/2004	01/09/2005	05/04/2000	01/09/2006	IDT		
2397	H/Aba d	Forest College	37/Shahen town	Abdur Rahim	Gul Hussan	Pesh	MA	2nd	PTC	B.Ed	02/01/1975	12/02/2000	19/02/2000	19/02/2000	22/10/1995	19/02/2000			
2629	H/Aba d	Forest College	37/Shahen town	Zahid Jamal Durani	Bahadur sher Durani	Pesh	MA	2nd	PTC	B.Ed	01/05/1980	12/11/2004	20/11/2004	20/11/2004	27/02/1998	20/11/2004	Absent		
3299	H/Aba d	Garhi Badshah Gul	Regi	Safdar Khan	Saadullah	Pesh	MA	2nd	PTC		03/04/1974	10/05/2010	13/05/2010	13/05/2010	09/01/2006	13/05/2010			
3420	H/Aba d	Garhi Ikramullah	Regi	Kamran Badshah	Hussain Shah	KARAK	MA	2nd	PTC		29/03/1984	01/04/2009	03/04/2009	30/09/2011	20/09/2007	30/09/2011	IDT		
3344	H/Aba d	Garhi-Sikandar Khan	60/Pushtakhara	Anwarul Haq	Jan Muhammad	Pesh	MA	2nd	PTC	B.Ed	13/02/1980	16/05/2010	15/05/2010	13/05/2010	09/01/2006	13/05/2010			

ATTENDED

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2926	H/Aba d	Noudeh Bala	81/Sufaid dheri	Muqeb Khan	Abdullah Jan	Pes h	MA	2nd	PTC		15/04/1972	13/01/2007	26/01/2007	20/01/2007	07/05/1999	20/01/2007	
3036	H/Aba d	Noudeh Bala	81/Sufaid dheri	Faizullah Jan	Ali Ahmad	Pes h	MA	2nd	PTC		03/02/1976	10/05/2010	12/05/2010	12/05/2010	19/01/2002	12/05/2010	
3085	H/Aba d	Noudeh Bala	81/Sufaid dheri	Firdos Khan	Shah Muhammad	Pes h	BA	2nd	PTC		04/10/1978	10/05/2010	12/05/2010	12/05/2010	25/04/2000	12/05/2010	
2419	H/Aba d	Palosi Attozai	41/Palosi	Falak Naz	Abdul Qayyum	Pes h	MA	2nd	PTC	B.Ed	07/01/1971	24/08/2000	01/09/2000	01/09/2000	27/02/1998	01/09/2000	
3167	H/Aba d	Palosi Attozai	41/Palosi	Sajid Khan	Darwesh Gul	Pes h	MA	2nd	PTC	B.Ed	02/10/1981	10/05/2010	12/05/2010	12/05/2010	20/09/2007	12/05/2010	
3333	H/Aba d	Palosi Attozai	41/Palosi	Asadullah	Rahatuliah	Pes h	MA	2nd	PTC		15/03/1982	10/05/2010	13/05/2010	13/05/2010	20/09/2007	13/05/2010	
2873	H/Aba o	Palosi Maghdar Zai	41/Palosi	Amjid Ali	Javed Ahmad	Pes h	MA	2nd	PTC	CT	16/12/1980	13/01/2007	16/01/2007	16/01/2007	09/03/2000	16/01/2007	
3007	H/Aba d	Palosi Maghdar Zai	41/Palosi	Bakhtiar Khan	Gul Akbar	Pes h	FA		PTC		03/10/1976	10/05/2010	10/05/2010	10/05/2010	19/01/2002	10/05/2010	
3306	H/Aba d	Palosi Maghdar Zai	41/Palosi	Abdul Bari	Fazle Subhan	Pes h	MA	2nd	PTC	CT	16/02/1976	10/05/2010	13/05/2010	13/05/2010	11/05/1999	13/05/2010	
3355	H/Aba d	Palosi Maghdar Zai	41/Palosi	Abdul Gheyas	Noor Zaman	Pes h	MA	2nd	PTC	B.Ed	02/02/1985	10/05/2010	13/05/2010	13/05/2010	01/02/2008	13/05/2010	
2473	H/Aba d	Palosi Turlazai	41/Palosi	Yousuf Khan	Waris Khan	Pes h	MA	2nd	PTC	B.Ed	07/09/1976	12/11/2004	18/11/2004	18/11/2004	25/04/2000	18/11/2004	
2476	H/Aba d	Palosi Turlazai	41/Palosi	Attaur Rahman	Yahya Jan	Pes h	MA	2nd	PTC	M.Ed	05/01/1977	12/11/2004	18/11/2004	18/11/2004	11/05/1999	18/11/2004	
2835	H/Aba d	Palosi Turlazai	41/Palosi	Ali	Faqir gul	Pes h	MA	2nd	PTC	B.Ed	12/05/1975	13/01/2007	16/01/2007	16/01/2007	25/04/2000	16/01/2007	
2896	H/Aba d	Palosi Turlazai	41/Palosi	Hayatullah	Saleh Muhammad	Pes h	MA	2nd	PTC	M.Ed	09/03/1974	13/01/2007	17/01/2007	17/01/2007	11/05/1999	17/01/2007	
3103	H/Aba d	Palosi Turlazai	41/Palosi	Ayub Khan	Waris Khan	Pes h	MA	2nd	PTC	CT	09/04/1979	10/05/2010	12/05/2010	12/05/2010	20/09/2007	12/05/2010	
2605	H/Aba d	Pawaka No. 1	35/Pawaka	S Zafar Ali Shah	S Mir Wali Shah	Pes h	BA	2nd	PTC		01/02/1979	12/11/2004	20/11/2004	20/11/2004	25/04/2000	20/11/2004	
2384	H/Aba d	Pawaka No. 2	35/Pawaka	Anjad Khan	Nazir Khan	Pes h	MA	2nd	PTC		26/03/1976	12/02/2000	18/02/2000	18/02/2000	27/02/1998	18/02/2000	
3108	H/Aba d	Pishtakhara Bala	60/pushtakhara	Sareer Khan	Khalo Khan	Pes h	MA	2nd	PTC		27/04/1979	12/05/2010	12/05/2010	12/05/2010	01/01/2006	12/05/2010	
2208	H/Aba d	Pishtakhara Payan No. 1	60/pushtakhara	Zahoor Khan	M Habib Khan	Pes h			PTC	B.Ed							FA entry not recorded
							BA	2nd			08/11/1973	04/09/1996	04/09/1996	21/11/1998	30/08/1996	21/11/1998	
2683	H/Aba d	Pishtakhara Payan No. 1	60/pushtakhara	Iftikhar Ali	Akbar Ali	Pes h	MA	2nd	PTC		16/05/1978	12/11/2004	24/11/2004	24/11/2004	27/02/1998	24/11/2004	DNA
2703	H/Aba d	Pishtakhara Payan No. 1	60/pushtakhara	Wajid Ali	Abdul Aziz	Pes h	MA	2nd	PTC		06/07/1975	13/01/2007	15/01/2007	15/01/2007	25/04/2000	15/01/2007	

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محفوظ جناب ڈی ای او صاحب ایلمنٹری ریڈ سکول ڈی ایویشن کیشن لیسٹ

16 عنوان: درخواست براد پر موشن BPS=14

جناب عالی

مکودبانہ گزارش ہے کہ سائل GPS فراڈ سٹور ہاؤس میں کثرت
PST تدریسی خدمات سرانجام دے رہا ہے۔

سال 2013ء میں پرائمری اساتذہ کو دی جانے والی ترقیوں میں
سائل کو محروم رکھا گیا۔ اپنے حق کے حصول کیلئے سائل نے بار بار
اپیل کی لیکن کوئی شنوائی نہیں ہوئی۔

اس سلسلے میں عرض ہے کہ سائل کی درخواست پر پھر دروازہ غور فرما
کر سائل کو BPS 14 میں فی الفور ترقی دینے کے احکامات صادر فرمائیں
سائل اس نوازش پر بے حد ممنون رہے گا۔

عین نوازش ہوگی

العارفتہ

آپ کا تابع فرما مدرس ظہور خان PST گورنمنٹ پرائمری سکول فرا
ڈ سٹور ہاؤس

المقوم
1
2016

ATTESTED

محفوظ جناب ڈائریکٹر صاحب ایجنسی اور سکندری ایجوکیشن پر
پتختو خوا 17

عنوان درخواست براد پروموشن 14 BPS

جناب عالی

من
مذکورہ بیانہ نرا میں ہے کہ مسائل GPS براہ کوششہ پایا میں بحیثیت
PS آئی تدریسی خدمات سرانجام دے رہا تھا ہے۔

سال 2013ء میں پرائمری اساتذہ کو دی جانے والی ترقیوں میں مسائل
کو محروم رکھا گیا۔ اپنے حق کے حصول کیلئے مسائل نے بار بار اپیل کی
لیکن کوئی شدوائی نہیں ہوئی۔

اس سلسلے میں عرض ہے کہ مسائل کی درخواست پر پھر رواتر غور فرما کر
مسائل کو 14 BPS میں فی الفور ترقی دینے کے احکام صادر فرمائیں
مسائل اس نوازش پر بے ہمتوں رہے گا۔
عین نوازش ہوگی

العارف

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آپ کا تابع فرما عدس ظہور خان PS گورنمنٹ پرائمری سکول براہ کوششہ پایا



ATTESTED

1/1
2016

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بھنوار جناب سیکرٹری ایجوکیشن چیئر مینختون خوا

18- عنوان: درخواست پگڑا پروموشن BPS=14

جناب عالی

سٹوڈنٹ ٹرائس ہے کہ سائل دہری پگڑا پشاورہ بابا میں ہیئت
DST تدریسی خدمات سے انجام دے رہا ہے۔

سال 2013ء میں پگڑی اساتذہ کو دی جانے والی ترقیوں میں
سائل کو محروم دکھا گیا۔ اپنے حق کے حصول کیلئے سائل نے بارہا اپیل
کیلیں کوئی شتواٹی نہیں ہوئی۔

اس سلسلے میں عرض ہے کہ سائل کی درخواست پگڑا پشاورہ بابا
سائل کو BPS=14 میں فی الفور ترقی دینے کے احکامات صادر فرمائیں
سائل اس نوازش پر بے حد ممنون رہے گا۔

عین نوازش ہوگی

العارف

کابینہ صاحب فرما جس پگڑا پشاورہ بابا
پگڑا پشاورہ بابا

1-1-2016

ATTESTED

محفوظ جناب ڈی ای او صاحب ایلتھریٹی اینڈ سیکورٹی ایڈمنسٹریشن

عنوان: درخواست براد:

(19)

حوالگی سنیارٹی لسٹ PST اساتذہ ذیر قانون
Right to information act.

جناب عالی

مذکورہ گزارش ہے کہ سائل GPS فراہم کرنے والے سائل میں بحیثیت PST خدمات

سرا انجام دے رہا ہے۔ سائل 2013 میں اساتذہ کو دی گئی ترقیوں میں حرم رکھا گیا۔ حق کے حصول کیلئے سائل بار بار اپیل کی لیکن کوئی شنوائی نہیں ہوئی۔ جبکہ سائل کو عدالت کا دروازہ کھٹکانا پڑا۔ کیس کی تیاری کیلئے 2013 کی اساتذہ کی سنیارٹی لسٹ درکار ہے۔

آپ صاحبان سے التماس ہے کہ سائل کو ذیر تحت right to information act مذکورہ سنیارٹی لسٹ حوالہ دے کر شکر یہ کا وضع دیں۔

عین فوارش ہوگی

العارف

آپ کا تابع زما مدرس ظہور خان PST گورنمنٹ پرائمری سکول ایف اے لکھنؤ

المخوم 25/2/2016

ATTESTED



68837

ایڈووکیٹ/دستخط
Amirul Islam
Advocate

بار کونسل ابار ایسوسی ایشن نمبر:

رابطہ نمبر: 0321-9100050

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: BEFORE THE HONBLE SERVICE TRIBUNAL PESHAWAR

APPELLANT	مخائب:	دعوی:
ZAHOR KHAN		علت نمبر:
بنام		مورخ:
Govt of KPK & OTHERS		جرم:
		تھانہ:

باعت تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
ان مقام (ب) کے لئے محترم خان اور کریٹر کو وکیل مقرر
کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
راہی نامہ کرنے و تقرر حالت و فیصلہ برطقت دینے جواب دعوی اقبال دعوی اور درخواست از ہر قسم کی تصدیق
زریں مدد تخطا کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہو گا اور صاحب
مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ پداختہ منظور و قبول ہوگا دوران مقدمہ
میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا وہ وکیل موصوف وصول کرنے کا حقدار ہوگا کوئی تاریخ پیشی مقام
دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ مندر ہے۔

المرقوم: 6 OCTOBER 2016

العبد _____ واہ شد _____
مقام _____ کے لئے منظور ہے۔

17301-8917441-1

ظہور خان و صاحب خان

Amirul Islam

SERVICE APPEAL NO. 420/2016

Zahoor Khan

V/S

GOVT.

Reply on behalf of the Respondents

Respectfully Sheweth:-

The Respondents submit below:-

Preliminary objections:-

- 1.** That the Appellant has got no cause of action/ locus standi.
- 2.** That the instant appeal is badly time barred.
- 3.** That as the Appellant has not challenge the Up-gradation Order, therefore, the instant Appeal is not maintainable.
- 4.** That the instant Appeal is bad for mis- joinder and non- joinder of the necessary parties.
- 5.** That the Appellant has not come with clean hands to this Hon, able Tribunal.
- 6.** That the instant appeal is barred by law.
- 7.** That this Hon, able Tribunal has got no jurisdiction to adjudicate upon the instant Service Appeal.
- 8.** That Appellant is an out District Candidate, his seniority shall be counted from the date taken over charge in District Peshawar.

On Facts

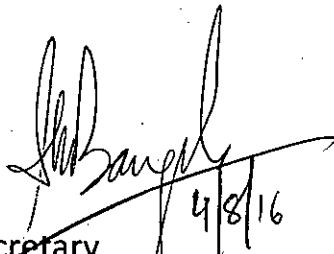
1. That Para-1 pertains to the Appellant personal record, hence no comments.
2. That Para-2 is correct to the extent that the Appellant is employee of the Respondent Department and has taken over charge on his present post in District Peshawar on dated 21-11-1998.
3. Incorrect. The Appellant has been refused to be promoted on grounds of being out District Candidate.
4. Incorrect. As the Appellant was not **Fit** for promotion because his seniority is counted from the dated of taking over charge on his present post in District Peshawar were up to Seniority No.2200, teachers have been promoted while the appellant stands at serial No.2208 of the seniority list. (Promotion order & Seniority list are attached as Annx: A&B)

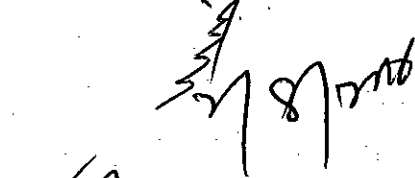
- 2
5. That Para-5 is incorrect and misleading. Detail reply has been given in the above Paras.
 6. That being out District Candidate. The Appellant shall be granted up-gradation on his own turn under the law and policy , therefore, his Departmental Representation is not maintainable.
 7. That as the Appellant has no cause of action and shall be *promoted* on his own turn under the law and policy, therefore, Para-7 is incorrect and misleading, hence denied.

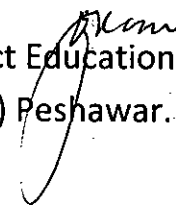
Grounds.


- A. Incorrect. Being out District Candidate, the Appellant shall be up-graded on his own turn under the law and policy.
- B. That Ground-B is incorrect and misleading; the Appellant did not fulfill the criteria required for *promotion*.
- C. That Ground-C is incorrect and denied. Being out District Candidate, the Appellant was not Fit for up-gradation.
- D. That Ground- D – E – F – G – H & I are incorrect and misleading, hence denied. Detailed replies have been given in the above Para.
- J. That the Respondents also seek leave of this Hon, able Tribunal to present case law and raise additional grounds at the time of arguments.

It is therefore, very humbly prayed that on the acceptance of this reply, the instant Service Appeal may very kindly be dismissed.


Secretary,
(E&SE) KPK, Peshawar.
4/8/16


Director,
(E&SE) KPK, Peshawar


District Education Officer,
(Male) Peshawar.


Deputy District Officer,
(Male) Peshawar



DISTRICT EDUCATION OFFICER (MALE)
PESHAWAR.

OFFICE ORDER:-

Consequent upon the recommendation of Departmental Promotion Committee meeting held on 17/1/2013, and in pursuance of the Govt: of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No. SO (B&A) 1-18/E&SE/2008 dated 12/10/2012 and No. SO(PE) 4-5/SSRC/Meeting/ 2012/ Teaching Cadre dated 13/11/2013 the following Primary School Teachers BPS.12 are hereby promoted to the post of Senior Primary School Teachers (Sr: PST) BPS.14 (Rs.8000-610-26300) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect.

S. No.	Seniority #	Circle	Teacher Name	Present School
1	1558	City	Wasiq Ali Shah	GPS G. Baloch No.2
2	1559	C/Pura	Muhammad Shahid	GMPS Kohatian
3	1561	Cantt	Muhammad Haroon	GPS No. 1 Garhi Qamar Din
4	1562	Mathra	Daulat Khan	GPS Qilla Chandan
5	1563	Cantt	Faiz Ul Haq	GPS Audit Colony Pesh
6	1564	City	Mushtaq Ahmad	GPS Rashid Garhi
7	1565	Mathra	Niamat Ullah	GPS Nawab Korona
8	1566	City	Shah Jehan	GPS Quaid Abad Pesh
9	1568	Cantt	M. Zulfiqar	GPS Madina Colony
10	1569	B/Ber.	Muhammad Younas	GPS Garhi Wakeelan
11	1570	B/Ber	Aqil Aarif	GPS Dandia Awanabad
12	1573	Mathani	Ifthikhar Ahmad	GPS Passani
13	1574	Mathani	Gohar Ali	GPS Mera Mattani
14	1575	City	Riaz Ahmad	GPS Moh: Islamabad
15	1577	H/Abad	Abid Ali	GPS Ghareeb Abad No. 2.
16	1578	Mathani	Rahim Shah	GPS Lora Sherker
17	1579	Mathani	Chaman Gul	GPS No.2 Adezai
18	1580	Mathra	N Bakhtiar Salik	GPS Kafoor Dheri
19	1581	C/Pura	Humayoun Khan	GPS Dala Zak
20	1582	C/Pura	S. Musharaf Shah	GPS No. 2 Mera Umar Payan
21	1583	H/abad	Abdullah Khan	GPS Forest College
22	1584	Cantt	Shakir Hayat	GPS Kotla Mohsin Khan
23	1585	H/Abad	Ajaz Ahmad	GPS Regi Lalma No. 1.
24	1587	Mathra	Mohammad Irshad	GPS Haji Zai
25	1588	Mathani	Shamsher Khan	GPS Garhi Banat
26	1589	City	Sohail Taj	GPS Shah Jee Abad
27	1590	H/Abad	Mahboobur Rahman	GPS Regi Lalma No. 2.
28	1592	City	M. Imtiaz Khattak	GPS Wazir Bagh 2

Sr: PST B.14 2nd

S. No.	Seniority #	Circle	Teacher Name	Present School
509	2186	City	Fazal Hussain	GPS Hazar Khawani 1
510	2187	B/Ber	Inamullah	GPS Masho Khel Aneezai
511	2188	Cantt	Shahid Munir	GPS No.2 Civil Quarters
512	2189	City	Abdul Rauf	GPS Sarbiland Pura 2
513	2190	Cantt	M Gohar Taj	GPS Railway Quarters
514	2192	City	M. Fakhar E Alam	GPS Latif Abad
515	2193	D/Zai	Peer Muhammad	GPS Naehapa Payan
516	2194	D/Zai	Khaista Khan	GPS New Garhi Bakhshi Pul
517	2196	Mathra	Fayaz Khan	GPS G. Kander Khel
518	2197	H/Abad	M Haq Khalil	GPS Tehkal Bala No. 1.
519	2198	City	M. Zahid Khan	GPS Beri Bagh
520	2199	Mathra	Mohammad Yahya-Jan	GPS Pir Bala
521	2200	City	M. Sayyar	GPS Sharif Abad

NOTE :-

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 regulation as may be issued from time to time by the Govt:
3. Their service can be terminated at any time, in case hi performance is found unsatisfactory during probationary period. In case of misconduct, he shall be preceded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Necessary entry to this effect should be made in their service books
6. Their inter-see seniority on lower post will remain intact.
7. Their adjustment order under the existing policy will be issued separately.

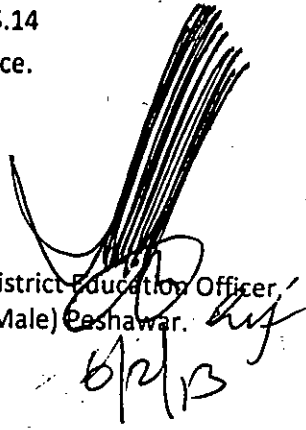
- 5
8. No TA / DA is allowed for joining his duty.
9. They will give an under taking to this effect to be recorded in their service books.

Sharif Gul
District Education Officer,
(Male) Peshawar.

Endst: No. 4103-4628 PST(M) /Promotion/Sr: PST Dated Peshawar the 06/02/2013

Copy for information to the :-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Sub Divisional Education Officer (Male) Peshawar with the remarks to verify the academic / Professional qualification documents i.e PTC / FA or equivalent of the above teachers from concerned Board / Agencies before fixation their pay in BPS.14
4. Assistant District Education Officer (Male) Primary local office.
5. Supdt: Local Office.
6. Officials Concerned.


Deputy District Education Officer
(Male) Peshawar.

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PESHAWAR.

FINAL SENIORITY LIST OF PSTs MALE DISTRICT PESHAWAR AS STOOD ON 15/11/2012

S#	Circle	School Name	Teacher Name	Father Name	Domicile	BPS	Acad: Qual:	BA Divi	Prof: Qualificaton	DOB	App; in Educa; Depart	D/O Regular Apptt:	DATE OF T/O/C/ ON PRESENT POST/ Peshawar	D/O/Passing PTC	DATE OF Consid-eratr.
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1	D/Zai	GPS Gul Bela	Jehan Zeb	Hasham Gul	Pesh	12	FA	-	CT	02/12/1952	16/04/1972	16/04/1972	16/04/1972	21/07/1972	21/07/1972
2	Mathra	GPS Garhi Sherdad.1	Mastan Shah	Gul Shah	Pesh	12	BA	2nd	PTC-CT	10/01/1953	17/04/1972	17/04/1972	17/04/1972	21/07/1972	21/07/1972
3	D/Zai	GPS No.2 Mewra	Gul Akbar	Said Akbar	Pesh	12	FA	-	PTC	21/01/1953	17/04/1972	17/04/1972	17/04/1972	21/07/1972	21/07/1972
4	H/ Abad	Agriculture Colony	Javed Hussan	Mian Hussan	Pesh	12	FA	-	PTC	16/03/1953	01/04/1972	17/04/1972	17/04/1972	21/07/1972	21/07/1972
5	City	GMPS AFGHAN #.2	PIR S. BADSHAH	S. RAHIM BADSHAH	Pesh	12	SSC	-	PTC	20/06/1953	06/12/1972	06/12/1972	6/12/1972	12/08/1972	06/12/1972
6	Mathra	GPS Haryan Garh	Hidayat Ullah	Maula Dad	Pesh:	12	BA	2nd	PTC-CT	13/12/1953	05/10/1972	05/10/1972	5/10/1972	31/08/1973	31/08/1973
7	Mathra	GPS Chaghar Matti 2	Momin Khan	Muhammad Saeed	Pesh	12	SSC	-	PTC	02/01/1954	05/10/1972	05/10/1972	5/10/1972	31/08/1973	31/08/1973
8	City	GPS HAZR KHAWANI 4	MUHAMMAD ZAMAN	SIKANDAR KHAN	Pesh	12	MA	2nd	PTC/CT	21/08/1953	01/10/1973	01/10/1973	1/10/1973	31/08/1973	01/10/1973
9	City	GPS HAZAR KHAWANI 1	MUHAMMAD RAZAQ	MUHAMMAD IBRAHIM	Pesh	12	SSC	-	PTC	04/04/1954	1/10/1973	1/10/1973	1/10/1973	31/08/1973	01/10/1973
10	Mathra	GPS Patwar Bala	Khawas Khan	Umara Khan	Pesh	12	BA	2nd	PTC	01/12/1954	07/10/1973	07/10/1973	7/10/1973	31/08/1973	7/10/1973
11	Cantt	GPS Peshawar Cantt	Zahid Hussain	Alam Sher	Pesh	12	F.A	N/A	PTC/C.T	05/01/1953	17/11/1971	18/11/1971	18/11/1971	24/10/1974	24/10/1974
12	City	GPS KOTLA FEEL BANAN	S. AMANULLAH SHAH	S. MUBARAK SHAH	Pesh	12	BA	2nd	PTC/CT	20/06/1954	31/01/1974	31/01/1974	31/01/1974	24/10/1974	24/10/1974
13	Mathra	GPS Warsak Colony	Abdul Ullah	Abdul Sattar	Pesh	12	SSC	-	PTC	15/09/1954	31/01/1974	31/01/1974	31/01/1974	24/10/1974	24/10/1974
14	Cantt	GPS No.1 Deh Bahadar	Naushad Khan	Sandal Khan	Pesh	12	SSC	N/A	PTC	25/09/1954	28/01/1974	31/01/1974	31/01/1974	24/10/1974	24/10/1974
15	City	GPS TAKIA SINGHAN	NIAZ ALI SHAH	RAHMAT SHAH	Pesh	12	SSC	-	PTC	01/04/1956	16/09/1974	16/09/1974	16/09/1974	24/10/1974	24/10/1974
16	H/Abad	Mullazai	Abdul Qayyum	Sohbat Khan	Pesh	12	BA	2nd	B. Ed,CT	25/03/1955	26/04/1975	01/05/1975	01/05/1975	20/03/1975	20/03/1975

S#	Circle	School Name	Teacher Name	Father Name	Domicile	BPS	Acad: Qual:	BA Divi	Prof: Qualificaton	DOB	App; in Educa; Depart	D/O Regular Apptt:	DATE OF T/O/I/ ON PRESENT POST/ Peshawar	D/O/Passing PTC	DATE OF Consid-eratn.
2189	City	GPS SARBILAND PURA 2	ABDUL RAUF	GUL KHAN	Pesh	12	MA	2nd	PTC/BED	02/09/1971	27/09/1993	27/09/1993	27/09/1993	27/02/1998	27/02/1998
2190	Cantt	GPS Railway Quarters	M Gohar Taj	Sher Afzal	Pesh	12	B.Sc	2nd	PTC	01/03/1972	22/09/1993	22/09/1993	27/09/1993	27/02/1998	27/02/1998
2191	C/Pura	GPS Tarnab Deh	Sabir Hussain	Yaseen Khan	Pesh	12	FA	0	PTC	12/01/1973	12/07/1993	12/07/1993	25/11/1993	27/02/1998	27/02/1998
2192	City	GPS LATIF ABAD	M. FAKHAR E ALAM	M. YOUSAF	Pesh	12	B. Sc	2nd	PTC	01/09/1973	23/09/1993	23/09/1993	23/09/1993	27/02/1998	27/02/1998
2193	D/Zai	GPS Nachapa Payan	Peer Muhammad	Gul Muhammad	Pesh	12	BA	2nd	PTC	03/11/1973	23/09/1993	23/09/1993	23/09/1993	27/02/1998	27/02/1998
2194	D/Zai	GPS New Garhi Bakhshi Pul	Khaista Khan	Said ul Hassan	Pesh	12	D. Com	0	PTC	20/11/1973	22/09/1993	22/09/1993	22/09/1993	27/02/1998	27/02/1998
2195	C/Pura	GPS No.3 Pakha Ghulam	M. Aslam Farooq	Muhammad Ismail	Pesh	12	SSC	0	PTC	10/03/1974	27/02/1998	27/02/1998	27/02/1998	27/02/1998	27/02/1998
2196	Mathra	GPS G. Kander Khel	Fayaz Khan	Muhammad Usman	Pesh	12	BA	2nd	PTC	15/05/1974	23/09/1993	23/09/1993	23/09/1993	27/02/1998	27/02/1998
2197	H/Abad	Tehkal Bala No 1.	M Haq Khalil	M Hassan Khalil	Pesh	12	FA		PTC	20/12/1974	09/09/1993	11/09/1993	11/09/1993	27/02/1998	27/02/1998
2198	City	GPS BERI BAGH	M. ZAHID KHAN	KHANZADA	Pesh	9	B. Com	2nd	PTC/CT	02/10/1970	28/02/1998	28/02/1998	28/02/1998	13/05/1997	28/02/1998
2199	Mathra	GPS Pir Bala	Mohammad Yahya Jan	Abdullah Jan	NSR	12	MA	2nd	PTC-CT	05/01/1964	01/10/1990	01/10/1990	14/04/1998	20/03/1995	14/04/1998
2200	City	GPS SHARIF ABAD	M. SAYYAR	FAZAL RAZAQ	CHD	12	FA		PTC	21/04/1969	13/10/1988	13/10/1988	01/08/1998	14/11/1990	01/08/1998
2201	City	GMPS LAKHKAR KILLI	ZAHID BADSHAH	GULAB SAID	MRD	12	BA	2nd	PTC	11/04/1967	01/09/1996	01/09/1996	19/08/1998	30/08/1996	19/08/1998
2202	D/Zai	GPS Bela Muhmandan	Yousaf Khan	Muhammad Nabi	Pesh	12	BA	2nd	PTC	05/08/1973	01/02/1996	01/02/1996	28/08/1998	25/05/1996	28/08/1998
2203	City	GMPS ASHRAFIA #.2	SAEED AHMAD	M. ABDUL RASHID	Dir	12	BA	2nd	PTC/CT	16/09/1954	01/11/1973	01/11/1973	1/09/1998	31/08/1973	01/09/1998
2204	Cantt	GPS Bara Line	Izzat ur Rehman	Muhammad Jalal	CHD	12	F.A	N/A	PTC	13/04/1968	14/01/1990	14/01/1990	01/09/1998	29/05/1994	01/09/1998
2205	H/Abad	Landi Akhun Ahmad	Muhammad Amin	Gulab Gul	Pesh	12	MA	2nd	CT	03/01/1971	31/12/1989	31/12/1989	01/09/1998	29/05/1994	01/09/1998

S#	Circle	School Name	Teacher Name	Father Name	Domicile	BPS	Acad: Qual:	BA Divi	Prof: Qualificaton	DOB	App; in Educa; Depart	D/O Regular Apptt:	DATE OF T/O/I/ ON PRESENT POST/ Peshawar	D/O/Passing PTC	DATE OF Consid- eratr.
2206	H/Abad	Hayat Abad No. 1.	Yousuf Ali	Qamar Ali	Bannu	12	FA		PTC	19/04/1971	12/11/1990	14/09/1995	01/09/1998	22/10/1991	01/09/1998
2207	H/Abad	Tehkal Payan No. 2.	Alam Zeb	Fazal Karim	Pesh	12	FA		PTC	11/09/1968	27/11/1990	28/11/1990	05/11/1998	14/11/1990	05/11/1998
2208	H/Abad	Pishtakhara Payan No. 1.	Zahoor Khan	M Habib Khan	Pesh	12	BA	2nd	B.Ed	08/11/1973	04/09/1996	04/09/1996	21/11/1998	30/08/1996	21/11/1998
2209	Mathra	GPS Garhi Sherdad 1	Raza Jan	Karim Jan	Mod. Ag	12	MA	3rd	PTC, CT	18/01/1970	25/10/1994	25/10/1994	1/02/1999	25/12/1993	1/02/1999
2210	B/Ber	JICA Model Mashokhel	MUJEEB NAWAZ	NISAR MUHAMMAD	Pesh	9	MA	2nd	PTC-CT- B.Ed	19/12/1971	20/04/1999	21/04/1999	21/04/1999	14/05/1997	21/04/1999
2211	Mathra	GPS Chaghar Matti 2	Hanif Ullah	Hamd Ullah Jan	Pesh	9	BA	2nd	PTC	26/02/1973	21/04/1999	21/04/1999	21/04/1999	30/08/1996	21/04/1999
2212	B/Ber	GPS KARA KHEL	ZAKIR HUSSAIN	FAQIR HUSSAIN	Pesh	9	BA	2nd	PTC	08/03/1973	20/04/1999	21/04/1999	21/04/1999	30/08/1996	21/04/1999
2213	Mathra	GPS Shahi Payan	Madad Khan	Fazal Qader	Pesh	9	MA	2nd	PTC-CT	05/04/1973	21/04/1999	21/04/1999	21/04/1999	03/05/1995	21/04/1999
2214	Mathra	GPS G. Kander Khel	Shakil Ahmad Shah	Rahim Shah	Pesh	9	MA	2nd	PTC-CT- B.Ed	07/01/1976	21/04/1999	21/04/1999	21/04/1999	25/05/1996	21/04/1999
2215	City	GPS HAZAR KHAWANI 3	AMAN ULLAH	NAZIR ULLAH	Pesh	9	MA	2nd	PTC/CT/B ED	03/03/1975	22/04/1999	22/04/1999	22/04/1999	27/02/1998	22/04/1999
2216	Mathra	GPS Magul Korona	Mohammad Shakil Khan	Abdul Wakeel	Pesh:	9	BA	2nd	PTC-B.Ed	20/04/1978	22/04/1999	22/04/1999	22/04/1999	13/05/1997	22/04/1999
2217	Mathra	GPS Hassan Abad	Noroz Khan	Fazal Kareem	Pesh:	9	MA	2nd	PTC-CT- B.Ed	01/01/1971	23/04/1999	23/04/1999	23/04/1999	25/05/1996	23/04/1999
2218	City	GPS FAISAL COLONY	NISAR MUHAMMAD	H. GULZAR MUHAMMAD	Pesh	7	SSC		PTC	01/04/1972	23/04/1999	23/04/1999	23/04/1999	25/05/1996	23/04/1999
2219	D/Zai	GPS No.2 Nilavi	Noor Khan	Gul Mir	Pesh	9	FA		PTC	20/01/1974	23/04/1999	23/04/1999	23/04/1999	13/05/1997	23/04/1999
2220	B/Ber	GPS M. Sher Kaley	JAVAID KHAN	HABIB KHAN	Pesh	9	MA	2nd	PTC-CT	15/06/1974	20/04/1999	22/04/1999	23/04/1999	30/08/1996	23/04/1999
2221	Cantt	GPS Hazar Khwani No. 2	Mehtab Shah	Muzamil Shah	Pesh	9	MA	2nd	B.Ed/CT	03/07/1974	22/04/1999	23/04/1999	23/04/1999	27/02/1998	23/04/1999
2222	Cantt	GPS Mehboobabad	Muhammad Waqif	Ulas Khan	Pesh	9	MA	1st	B.Ed/CT	03/04/1977	20/04/1999	23/04/1999	23/04/1999	27/02/1998	23/04/1999
2223	Mathra	GPS Garanga Payan	Mohammad Ibrahim Khan	Muhammad Khan	Pesh	9	MA	2nd	PTC-CT- B.Ed	18/03/1978	23/04/1999	23/04/1999	23/04/1999	25/05/1996	23/04/1999