

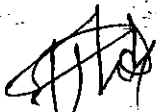
22.07.2019


Counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today consisting of five pages placed in connected Service Appeal No. 818/2016 titled "Syed Fazal Abbas Zaidi Versus The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa Civil Secretariat, Peshawar and four others, the departmental appeal of the appellant is badly time barred. Hence, without touching the merit of the case, the present service appeal is dismissed being time barred. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

22.07.2019


(Hussain Shah)
Member


(Muhammad Amin Khan Kundi)
Member

16.04.2019

Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 12.06.2019 before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

12.06.2019

Counsel for the appellant and Mr. Usman Ghani District Attorney for the respondents present.

Learned counsel for the appellant once again requests for adjournment in order to seek further instructions from the appellant.

The record shows that on so many previous occasions adjournment was sought on behalf of the appellant, therefore, instant matter is adjourned to 22.07.2019 for arguments before he D.B but as a last chance.


Member


Chairman


31.10.2018


Due to retirement of Hon'ble Chairman, the Tribunal is defunct. Therefore, the case is adjourned. To come up on 18.12.2018.


READER

18.12.2018

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 01.02.2019 before D.B.


(Hussain Shah)
Member


(Muhammad Amin Khan Kundi)
Member

01.02.2019

Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 13.03.2019 before D.B.


Member


Member

13.03.2019

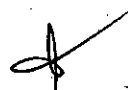
Learned counsel for the appellant and Mr. Kabir Ullah Khattak learned Additional Advocate General present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 16.04.2019 before D.B.



Member


Member

28.02.2018

Counsel for the appellant present. Mr. Muhammad Jan, Deputy District Attorney for the respondents also present. Learned counsel for the appellant submitted rejoinder and requested for adjournment for arguments. Adjourned. To come up for arguments on 03.05.2018 before D.B.


Member (Executive)


Member (Judicial)

03.05.2018


Due to retirement of the worthy Chairman, the Tribunal is incomplete, therefore the case is adjourned. To come up for same on 17.07.2018 before D.B


Reader

17.07.2018

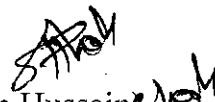
Learned counsel for the appellant and Mr. Zia Ullah, learned Deputy District Attorney present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 07.09.2018 before D.B


(Ahmad Hassan)
Member


(Muhammad Hamid Mughal)
Member

07.09.2018

Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 31.10.2018 before D.B.


(Shah Hussain)
Member


(Muhammad Amin Khan Kundi)
Member

05.06.2017

Clerk of the counsel for appellant present. Mr. Muhammad Adeel Butt, Additional AG for the respondents also present. Due to strike of the bar learned counsel for the appellant is not in attendance. Adjourned. To come up for rejoinder and arguments on 02.10.2017 before D.B.

(GUL ZEB KHAN)
MEMBER

(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

02.10.2017

Learned counsel for the appellant present. Mr. Zia Ullah, Deputy District Attorney for the respondents present. Counsel for the appellant requested for time to file rejoinder. Request accepted. To come up for rejoinder/arguments on 28.12.2017 before D.B.

Member
(Executive)

Member
(Judicial)

28.12.2017

Clerk to counsel for the appellant and Addl: AG for respondents present. Arguments could not be heard due to incomplete bench. Adjourned. To come up for arguments on 28.02.2018 before D.B.

Member

819/2016


17.11.2016

Counsel for the appellant and Assistant AG for respondents present. Preliminary arguments heard. According to notification dated 03.06.2003 personal grade BPS-17 were awarded to similarly placed employees. As such the appeal is admitted for regular hearing subject to deposit of security and process fee within 10 days, where-after notices be issued to the respondents for written reply/comments for 09.01.2017 before S.B.


Chairman

09.01.2017

Counsel for the appellant and Additional AG for the respondents present. Written reply not submitted. Requested for adjournment. To come up for written reply/comments on 13.02.2017 before S.B.


Chairman

13.02.2017

Clerk to counsel for the appellant and Addl. AG for respondents present. Written reply not submitted. Requested for adjournment. To come up for written reply/comments on 15.03.2017 before S.B.


(AHMAD HASSAN)
MEMBER

15.03.2017

Counsel for the appellant and Mr. Hameed ur Rehman, AD (Litigation) alongwith Addl. AG for respondents present. Written reply submitted. To come up for rejoinder and arguments on 05.06.2017 before D.B.


(AHMAD HASSAN)
MEMER

Appellant Deposited
Security & Process Fee

4. In this para the stance of the appellant taken in his appeal has been admitted by the replying respondents i.e. the respondents have admitted qualification of the appellant, the adjustment against the post of DPE, the promotion of the appellant to the said post on regular basis and award of BPS-17 personal to those DPEs working in BPS-16, having Master Degree in the relevant subject and even under the notification mentioned in this para, the appellant was fully entitled for award of BPS-17 personal being similarly paced person from the date of his adjustment against the DPE post. Regarding the fact that "the appellant failed to challenge any of the orders in the foregoing paras" is concerned in this regard, it is submitted that the respondents themselves had antedated his promotion vide annex E with the appeal therefore, there was no need to challenge the same.

Replication to the Grounds

A - H: The contents of these paras of the Reply are incorrect, false, misconceived and are based

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

In Re:- Service Appeal No. ____/ 2016

Abdus Sattar

..... Appellant

Versus

Secretary E & SE KP & others..... Respondents

Replication on behalf of appellant to the Joint Reply
/ Para-wise Comments of Respondents

Respectfully Submitted:

Replication to the preliminary objections

1 - 10 & 12 The preliminary objections raised by the Respondents in these paras are incorrect, false, misconceived and are based on no evidence, hence mainly for the reasons of paras 11 & 13, hence denied. Moreover, it is submitted that the appellant has got a valid cause of action/locus standi to challenge the illegal

non award of BPS-17 (personal) to appellant has been admitted and even the promotion of the appellant from PET Post to DPE Post is also admitted so in these circumstances the appellant working in BPS-16 in Govt. Higher Secondary School with Master Degree in the relevant subject was very much entitled for award of BPS-17 as personal grade but illegally, unconstitutionally and malafidely has been ignored for award of the same BPS which act of the department is neither legal, nor constitutional and not only based on malafide intention of the department / respondent but also is against the well establishment principles of natural justice.

Replication to the facts

- 1 & 3: These paras need no replication in light of para-1 and 3 of the appeal, which are repeated.
2. In this para, the contents of Para-2 of the Appeal have been repeated, therefore needs no replication.

acts and commissions of the respondents. The appeal is well within time, no facts have been concealed from this Hon'ble Tribunal and no drifty hands have been shown or proved each and every facts has been narrated by the appellant in his appeal and all the necessary parties have been arrayed by him in his appeal, no mis-joinder or non-joinder has been shown or proved by the respondents. No malafide on the part of the appellant has been shown or proved while the same is proved on the part of the respondents. The appeal is maintainable in its present form and in the present circumstances and there could be no other form but in which it has been submitted and the same is not barred by any law but has been submitted strictly in accordance with laws/rules. Moreover, being a matter of terms and conditions of service this Hon'ble Tribunal has got a valid jurisdiction.

11 & 13: That in para-13, award of BPS-17 as personal to those DPES working in BPS-16 having Master Degree in the relevant subject has been admitted by the respondents and in Para-11

4. In this para the stance of the appellant taken in his appeal has been admitted by the replying respondents i.e. the respondents have admitted qualification of the appellant, the adjustment against the post of DPE , the promotion of the appellant to the said post on the promotion of the appellant to the said post on regular basis and award of BPS-17 personal to those DPEs working in BPS-16, having Master Degree in the relevant subject and even under the notification mentioned in this para, the appellant was fully entitled for award of BPS-17 personal being similarly paced person from the date of his adjustment against the DPE post. Regarding the fact that "the appellant failed to challenge any of the orders in the foregoing paras" is concerned in this regard, it is submitted that the respondents themselves had antedated his promotion vide annex E with the appeal therefore, there was no need to challenge the same.

Replication to the Grounds

A – H: The contents of these paras of the Reply are incorrect, false, misconceived and are based

on no evidence, proof, therefore denied, while the contents of these pars of the appeal are correct, true, crystal-clear and are based on cogent proof, which are reiterated once again. Moreover, the stance/entitlement of the appellant for award of BPS-17 personal has been admitted by the respondents one way or the other in their Reply.

It is, therefore, humbly prayed that on acceptance of the above and facts narrated and grounds mentioned in the appeal, the appeal of the appellant may kindly be accepted and the relief claimed in the appeal may kindly be granted to the appellant.

Any other remedy/relief available in the circumstances of the case may also kindly be granted to the appellant.

Dated: 24.02.2018

Appellant

Through



Syed Younas Jan

Advocate, Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR

In Re:- Service Appeal No. ____/ 2016

Abdus Sattar

....., Appellant

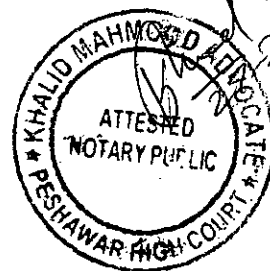
Versus

Secretary E & SE KP & others..... Respondents

AFFIDAVIT / COUNTER AFFIDAVIT

I, Abdus Sattar (The Appellant), do hereby solemnly affirm and declare on oath that the contents of this Replication are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal while the contents of the Reply of the respondents, which goes against the appellant are incorrect, false, misconceived and are without proof/evidence.

ABDUS SATTAR
DEPONENT



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

In Re:- Service Appeal No. ____/ 2016

Abdus Sattar

..... Appellant

Versus

Secretary E & SE KP & others..... Respondents

Replication on behalf of appellant to the Joint Reply
/ Para-wise Comments of Respondents

Respectfully Submitted:

Replication to the preliminary objections

1 - 10 & 12 The preliminary objections raised by the Respondents in these paras are incorrect, false, misconceived and are based on no evidence, hence mainly for the reasons of paras 11 & 13, hence denied. Moreover, it is submitted that the appellant has got a valid cause of action/locus standi to challenge the illegal

acts and commissions of the respondents. The appeal is well within time, no facts have been concealed from this Hon'ble Tribunal and no drift hands have been shown or proved each and every facts has been narrated by the appellant in his appeal and all the necessary parties have been arrayed by him in his appeal, no mis-joinder or non-joinder has been shown or proved by the respondents. No malafide on the part of the appellant has been shown or proved while the same is proved on the part of the respondents. The appeal is maintainable in its present form and in the present circumstances and there could be no other form but in which it has been submitted and the same is not barred by any law but has been submitted strictly in accordance with laws/rules. Moreover, being a matter of terms and conditions of service this Hon'ble Tribunal has got a valid jurisdiction.

11 & 13: That in para-13, award of BPS-17 as personal to those DPES working in BPS-16 having Master Degree in the relevant subject has been admitted by the respondents and in Para-11

non award of BPS-17 (personal) to the appellant has been admitted and even the promotion of the appellant from PET Post to DPE Post is also admitted so in these circumstances the appellant working in BPS-16 in Govt. Higher Secondary School with Master Degree in the relevant subject was very much entitled for award of BPS-17 as personal grade but illegally, unconstitutionally and malafidely has been ignored for award of the same BPS which act of the department is neither legal, nor constitutional and not only based on malafide intention of the department / respondent but also is against the well establishment principles of natural justice.

Replication to the facts

- 1 & 3: These paras need no replication in light of para-1 and 3 of the appeal, which are repeated.
2. In this para, the contents of Para-2 of the Appeal have been repeated, therefore needs no replication.

4.

In this para the stance of the appellant taken in his appeal has been admitted by the replying respondents i.e. the respondents have admitted qualification of the appellant, the adjustment against the post of DPE, the promotion of the appellant to the said post on the promotion of the appellant to the said post on regular basis and award of BPS-17 personal to those DPEs working in BPS-16, having Master Degree in the relevant subject and even under the notification mentioned in this para, the appellant was fully entitled for award of BPS-17 personal being similarly paced person from the date of his adjustment against the DPE post. Regarding the fact that "the appellant failed to challenge any of the orders in the foregoing paras" is concerned in this regard, it is submitted that the respondents themselves had antedated his promotion vide annex E with the appeal therefore, there was no need to challenge the same.

Replication to the Grounds

A – H: The contents of these paras of the Reply are incorrect, false, misconceived and are based

on no evidence, proof, therefore denied, while the contents of these pars of the appeal are correct, true, crystal-clear and are based on cogent proof, which are reiterated once again. Moreover, the stance/enlillement of the appellant for award of BPS-17 personal has been admitted by the respondents one way or the other in their Reply.

It is, therefore, humbly prayed that on acceptance of the above and facts narrated and grounds mentioned in the appeal, the appeal of the appellant may kindly be accepted and the relief claimed in the appeal may kindly be granted to the appellant.

Any other remedy/relief available in the circumstances of the case may also kindly be granted to the appellant.

Dated: 24.02.2018

Appellant

Through



Syed Younas Jan

Advocate, Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

In Re:- Service Appeal No. ____/ 2016

Abdus Sattar

..... Appellant

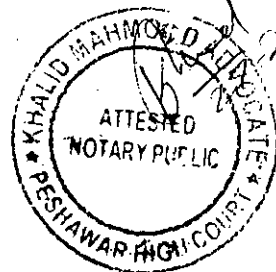
Versus

Secretary E & SE KP & others..... Respondents

AFFIDAVIT / COUNTER AFFIDAVIT

I, Abdus Sattar (The Appellant), do hereby solemnly affirm and declare on oath that the contents of this Replication are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal while the contents of the Reply of the respondents, which goes against the appellant are incorrect, false, misconceived and are without proof/evidence.

ABDUS SATTAR
DEPONENT



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR

In Re:- Service Appeal No. ____/ 2016

Abdus Sattar

..... Appellant

Versus

Secretary E & SE KP & others..... Respondents

Replication on behalf of appellant to the Joint Reply
/ Para-wise Comments of Respondents

Respectfully Submitted:

Replication to the preliminary objections

1 - 10 & 12 The preliminary objections raised by the Respondents in these paras are incorrect, false, misconceived and are based on no evidence, hence mainly for the reasons of paras 11 & 13, hence denied. Moreover, it is submitted that the appellant has got a valid cause of action/locus standi to challenge the illegal

acts and commissions of the respondents. The appeal is well within time, no facts have been concealed from this Hon'ble Tribunal and no drifty hands have been shown or proved each and every facts has been narrated by the appellant in his appeal and all the necessary parties have been arrayed by him in his appeal, no mis-joinder or non-joinder has been shown or proved by the respondents. No malafide on the part of the appellant has been shown or proved while the same is proved on the part of the respondents. The appeal is maintainable in its present form and in the present circumstances and there could be no other form but in which it has been submitted and the same is not barred by any law but has been submitted strictly in accordance with laws/rules. Moreover, being a matter of terms and conditions of service this Hon'ble Tribunal has got a valid jurisdiction.

11 & 13: That in para-13, award of BPS-17 as personal to those DPES working in BPS-16 having Master Degree in the relevant subject has been admitted by the respondents and in Para-11

non award of BPS-17 (personal) to the appellant has been admitted and even the promotion of the appellant from PET Post to DPE Post is also admitted so in these circumstances the appellant working in BPS-16 in Govt. Higher Secondary School with Master Degree in the relevant subject was very much entitled for award of BPS-17 as personal grade but illegally, unconstitutionally and malafidely has been ignored for award of the same BPS which act of the department is neither legal, nor constitutional and not only based on malafide intention of the department / respondent but also is against the well establishment principles of natural justice.

Replication to the facts

- 1 & 3: These paras need no replication in light of para-1 and 3 of the appeal, which are repeated.

2. In this para, the contents of Para-2 of the Appeal have been repeated, therefore needs no replication.

4.

In this para the stance of the appellant taken in his appeal has been admitted by the replying respondents i.e. the respondents have admitted qualification of the appellant, the adjustment against the post of DPE, the promotion of the appellant to the said post on the promotion of the appellant to the said post on regular basis and award of BPS-17 personal to those DPEs working in BPS-16, having Master Degree in the relevant subject and even under the notification mentioned in this para, the appellant was fully entitled for award of BPS-17 personal being similarly paced person from the date of his adjustment against the DPE post. Regarding the fact that "the appellant failed to challenge any of the orders in the foregoing paras" is concerned in this regard, it is submitted that the respondents themselves had antedated his promotion vide annex E with the appeal therefore, there was no need to challenge the same.

Replication to the Grounds


A – H: The contents of these paras of the Reply are incorrect, false, misconceived and are based

on no evidence, proof, therefore denied, while the contents of these pars of the appeal are correct, true, crystal-clear and are based on cogent proof, which are reiterated once again. Moreover, the stance/entitlement of the appellant for award of BPS-17 personal has been admitted by the respondents one way or the other in their Reply.

It is, therefore, humbly prayed that on acceptance of the above and facts narrated and grounds mentioned in the appeal, the appeal of the appellant may kindly be accepted and the relief claimed in the appeal may kindly be granted to the appellant.

Any other remedy/relief available in the circumstances of the case may also kindly be granted to the appellant.

Dated: 24.02.2018

Appellant
Through 
Syed Younas Jan
Advocate, Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

In Re:- Service Appeal No. _____ / 2016

Abdus Sattar

..... Appellant

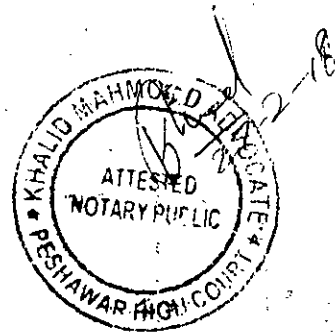
Versus

Secretary E & SE KP & others..... Respondents

AFFIDAVIT / COUNTER AFFIDAVIT

I, Abdus Sattar (The Appellant), do hereby solemnly affirm and declare on oath that the contents of this Replication are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal while the contents of the Reply of the respondents, which goes against the appellant are incorrect, false, misconceived and are without proof/evidence.

ABDUS SATTAR
DEPONENT



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

In Re:- Service Appeal No. ____/ 2016

Abdus Sattar

..... Appellant

Versus

Secretary E & SE KP & others..... Respondents

Replication on behalf of appellant to the Joint Reply
/ Para-wise Comments of Respondents

Respectfully Submitted:

Replication to the preliminary objections.

1 - 10 & 12 The preliminary objections raised by the Respondents in these paras are incorrect, false, misconceived and are based on no evidence, hence mainly for the reasons of paras 11 & 13, hence denied. Moreover, it is submitted that the appellant has got a valid cause of action/locus standi to challenge the illegal

acts and commissions of the respondents. The appeal is well within time, no facts have been concealed from this Hon'ble Tribunal and no drift hands have been shown or proved each and every facts has been narrated by the appellant in his appeal and all the necessary parties have been arrayed by him in his appeal, no mis-joinder or non-joinder has been shown or proved by the respondents. No malafide on the part of the appellant has been shown or proved while the same is proved on the part of the respondents. The appeal is maintainable in its present form and in the present circumstances and there could be no other form but in which it has been submitted and the same is not barred by any law but has been submitted strictly in accordance with laws/rules. Moreover, being a matter of terms and conditions of service this Hon'ble Tribunal has got a valid jurisdiction.

11 & 13: That in para-13, award of BPS-17 as personal to those DPES working in BPS-16 having Master Degree in the relevant subject has been admitted by the respondents and in Para-11

non award of BPS-17 (personal) to the appellant has been admitted and even the promotion of the appellant from PET Post to DPE Post is also admitted so in these circumstances the appellant working in BPS-16 in Govt. Higher Secondary School with Master Degree in the relevant subject was very much entitled for award of BPS-17 as personal grade but illegally, unconstitutionally and malafidely has been ignored for award of the same BPS which act of the department is neither legal, nor constitutional and not only based on malafide intention of the department / respondent but also is against the well establishment principles of natural justice.

Replication to the facts

- 1 & 3: These paras need no replication in light of para-1 and 3 of the appeal, which are repeated.
2. In this para, the contents of Para-2 of the Appeal have been repeated, therefore needs no replication.

4. In this para the stance of the appellant taken in his appeal has been admitted by the replying respondents i.e. the respondents have admitted qualification of the appellant, the adjustment against the post of DPE , the promotion of the appellant to the said post on the promotion of the appellant to the said post on regular basis and award of BPS-17 personal to those DPEs working in BPS-16, having Master Degree in the relevant subject and even under the notification mentioned in this para, the appellant was fully entitled for award of BPS-17 personal being similarly paced person from the date of his adjustment against the DPE post. Regarding the fact that "the appellant failed to challenge any of the orders in the foregoing paras" is concerned in this regard, it is submitted that the respondents themselves had antedated his promotion vide annex E with the appeal therefore, there was no need to challenge the same.

Replication to the Grounds

A – H: The contents of these paras of the Reply are incorrect, false, misconceived and are based

on no evidence, proof, therefore denied, while the contents of these parts of the appeal are correct, true, crystal-clear and are based on cogent proof, which are reiterated once again. Moreover, the stance/enlillement of the appellant for award of BPS-17 personal has been admitted by the respondents one way or the other in their Reply.

It is, therefore, humbly prayed that on acceptance of the above and facts narrated and grounds mentioned in the appeal, the appeal of the appellant may kindly be accepted and the relief claimed in the appeal may kindly be granted to the appellant.

Any other remedy/relief available in the circumstances of the case may also kindly be granted to the appellant.

Dated: 24.02.2018

Appellant

Through 

Syed Younas Jan

Advocate, Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

In Re:- Service Appeal No. _____/ 2016

Abdus Sattar

..... Appellant

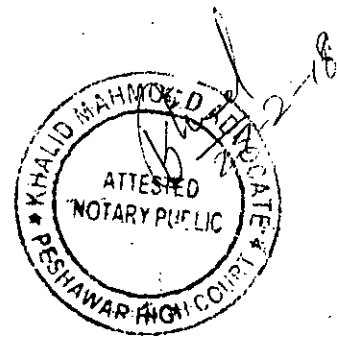
Versus

Secretary E & SE KP & others..... Respondents

AFFIDAVIT / COUNTER AFFIDAVIT

I, Abdus Sattar (The Appellant), do hereby solemnly affirm and declare on oath that the contents of this Replication are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal while the contents of the Reply of the respondents, which goes against the appellant are incorrect, false, misconceived and are without proof/evidence.

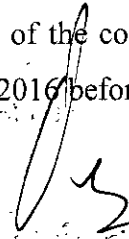
ABDUS SATTAR
DEPONENT



29.09.2016

Counsel for the appellant present. Through the instant appeal, the appellant has impugned order dated 18.02.2003 vide which the appellant was appointed as DPE (BPS-16) on regular basis. The appellant claimed that he should have been appointed in (BPS-17) as personal. Against the impugned order the appellant filed departmental appeal on 8.04.2016 which was not responded within the statutory period.

Since the matter required further consideration of this Tribunal therefore, pre-admission notice be issued to the learned Additional AG to assist of the court. To come up for further proceedings on 27.10.2016 before S.B


Member

27.10.2016

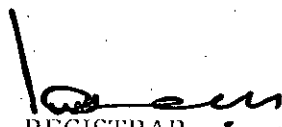


Counsel for the appellant has sent an application for adjournment. Assistant A.G for the respondents present. Adjourned for preliminary hearing to 17.11.2016 before S.B.


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 819/2016


S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	11/08/2016	<p>The appeal of Mr. Abdul Sattar resubmitted today by Syed Younas Jan Advocate may be entered in the Institution Register and put up to Learned Member for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2	16-8-2016	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on. <u>31-08-2016</u></p> <p style="text-align: right;"> MEMBER</p>
	31.08.2016	<p>None present on behalf of the appellant. The appeal be relisted for preliminary hearing for 29.09.2016 before S.B.</p> <p style="text-align: right;"> Member</p>

The appeal of Mr. Abdul Sattar DPE Retired D.I.Khan received to-day i.e. on 02.08.2016 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- In the memo of appeal places have been left blank which may be filled up.
- 2- Copies of memo of Service appeal and judgment passed on it by this Tribunal mentioned in para-3 of the memo of appeal (Annexure-E) are not attached with the appeal which may be placed on it.

No. 1241 /S.T,

Dt. 4/8 /2016

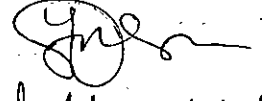

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Syed Younas Jan Adv. Pesh.

Sir,

1) Objection No 1 removed and as the objection No 2 is concerned in this regard it is submitted that the appeal of the appellant against the order dated 15-6-2009 (Annex E) is still pending before this Honorable Tribunal and no order/judgment has been passed on the same so far.

He submitted with the above today on 11.8.2016


Syed Younas Jan
Advocate Peshawar

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No: 819/2016

Abdus Sattar (Rtd) DPE GHSS No: 3 D I Khan

... Appellant.

VERSUS

Secretary E&SE Department, Khyber Pakhtunkhwa & others.

..... Respondents

JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-5.

Respectfully Sheweth :-

The Respondents submit as under:-

PRELIMINARY OBJECTIONS.

- 1 That the Appellant has got no cause of action locus / standi .
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal.
- 4 That the instant service appeal is based on mala fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands .
- 6 That this Honorable Tribunal has got no jurisdiction to adjudicate upon the present appeal.
- 7 That the Appellant has been treated as per law, rules & policy.
- 8 That the appeal is not maintainable in its present form.
- 9 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 10 That the instant Service Appeal is barred by law.
- 11 That the Appellant has not ^{been} awarded BPS-17 (Personal) & was promoted from PET to the DPE Post vide Notification dated 30/8/2000, which has not been challenged by the appellant.
- 12 That as per Finance Department Notification dated 03/8/1993, the appellant is not entitled for the grant of back benefits against the said Post.
- 13 That as per Govt: of Khyber Pakhtunkhwa, Pay Revised Rules, 1978, BPS-17. (Personal) was awarded to those DPEs working in BPS-16 along with Master Degree in the relevant subject.

ON FACTS

- 1 That Para-1, needs no comments being pertains to the service record of the appellant.

- 2 That Para-2 is incorrect, ~~that~~ The appellant has been promoted against the DPE Post from PET vide Notification dated 30/8/2000, in his own pay & scale with immediate effect & later on he has been promoted against the said Post on regular basis vide Notification dated 18/2/2003 in BPS-16(Regular). (Copies of the same are Annexures-A&B).
- 3 That Para-3, is correct. However the appellant did not challenged any of the promotion order for anti dation.
- 4 That Para-4 is incorrect & denied on the grounds that the appellant has acquired his M. Sc Degree in HPE from Gomal University D I Khan on 04/11/1991 & was adjusted against the DPE Post from PET vide Notification dated 30/8/2000 on the basis of his qualification of SDPE with immediate effect. Upon the approval of the DPC Meeting held on 18/2/2003, the appellant was promoted to the DPE Post in BPS-16 on Regular basis with immediate effect. The appellant was further promoted against the DPE in BPS-17 (Regular) Post vide Notification dated 19/5/2009 with immediate effect. It is further submitted that in view of the Pay. Revised Rules, 1978 of the Provincial Govt: , BPS-17 was awarded those DPEs who were already working in BPS-16 having M. Sc Degree in the relevant subject. However, vide Notification dated 03/8/1993 amendments in the said rules were made by declaring junior DPEs in BPS-16 & Senior DPEs in BPS-17(Personal). Furthermore, the appellant has failed to challenged any of the orders mentioned in the foregoing Paras, nor any Departmental Appeal is available on record so the present appeal is liable to be dismissed on this score, on the following grounds inter alia :-

GROUNDS

- A Incorrect & not admitted. The act of the Respondent Department in view of the above made submissions in the foregoing Paras of the present reply is within legal sphere & is liable to be maintained.
- B Incorrect & not admitted. The statement f the appellant is against the law, rules & circumstance of the case. Hence deserves to be dismissed.
- C Incorrect & not admitted. Detailed reply of this ground has already been given in the foregoing Paras. Hence needs no further comments.
- D Incorrect & not admitted. The Respondents have acted as per law, rules & policy in the instant case in terms of the above mentioned Notifications, hence deserves to be maintained in the interest of justice.
- E Incorrect & not admitted. The statement f the appellant is against the law, rules & circumstance of the case. Hence deserves to be rejected.
- F Incorrect & denied on the grounds that the appellant has been found in eligible in view of the above cited rulings. Hence this Para is also liable to be rejected.
- G Incorrect & denied. Each & every case has its own parameter & the case of the appellant is totally different from those who have been treated as per law, rules & Policy in view of the above made rulings & Notifications.
- H Legal. However, the Respondents further seek leave of this Honorable Tribunal to submit additional grounds & case law /record at the time of arguments.

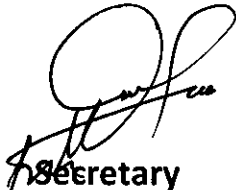
In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favour of the Respondent Department.

Dated 02/01/2017.



Secretary

E&SE Department Khyber
Pakhtunkhwa, Peshawar
(Respondents No:1&5)



Secretary

Establishment Department
Khyber Pakhtunkhwa,
Peshawar.
(Respondent No:4)



Director

E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 2)



Secretary

(Finance) Department Khyber
Pakhtunkhwa, Peshawar
(Respondent No: 3)

AFFIDAVIT

I Hameed Ur Rehman Asstt: Director (Litigation-II) E&SE Department do hereby solemnly affirm and declare On oath that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.



Deponent

10

DIRECTORATE OF SCHOOLS AND LITERACY N.W.F.P. PESHAWAR.

ORDER.

Annex "A" (13)

Consequent upon the approval by the Departmental Selection Committee Schools Directorate NWFP in its meeting held on 26-12-2002. The following CT/PET/PTC, etc are hereby promoted to the posts of DPE/ADO (Physical) B 16 on regular basis in the interest of public service with immediate effect.

Name & Designation	Promoted as	Place of posting	Remarks
Mr. Saeed Azam Khan PET	DPE	GEC, Ghori Wala Bannu	Against the post already occupied by him
Mr. Saqib-ud-Din PET	DPE	GHSS, Khowaza Khela Swat	Against the post already occupied by him
Mr. Saqib-ud-Din PET	DPE	GHSS, Lachi Kohat	Against the post already occupied by him
Mr. Masood Nawaz PET	DPE	GHSS No. 2 Pesh/Cannor	Against the post already occupied by him
Mr. Fiaz Naz PET	DPE	GHSS Mangla Dargai Charsadda	Against the post already occupied by him
Mr. Javed Khan PET	DPE	GHSS Chankani Peshawar	Against the post already occupied by him
Mr. Muhammad Jalal PET	DPE	GHSS Kakki Bannu	Against the post already occupied by him
Mr. Abdul Sattar PET	DPE	GHSS Gul Inam Tank	Against the post already occupied by him
Mr. Jamil Abdul Nasir PET	DPE	GHSS Totakan Mkd Agy:	Against the post already occupied by him
Mr. Farid Phyl: Supervisor	DPE	GHSS Daag Peshawar	Against the post already occupied by him
Mr. Muhammad Naeem PET	DPE	GHSS Ghaher, Lapura MDN	Against the post already occupied by him
Mr. Asad Hayat PET	DPE	GHSS Kot Malakand Agy:	Against the post already occupied by him
Mr. Waqar Ahmad PET	DPE	GHSS Laxema Charsadda	Against the post already occupied by him
Mr. Ghulam Khan PET	DPE	GHSS Dara Pezu Lak	Against the post already occupied by him
Mr. Asif Qureshi PET	DPE	GHSS Tugh Bala Kohat	Against the post already occupied by him
Mr. Asadullah Khan PET	DPE	GHSS Kotgarh D I Khan	Against the post already occupied by him
Mr. Asad Phyl: Supervisor	DPE	GEC, D I Peshawar	Against the post already occupied by him
Mr. Asif Khan PET	DPE	GHSS Hazanpur NSR	Against the post already occupied by him
Mr. Asif J. Shah PET	DPE	GHSS Karam Mardan	Against the post already occupied by him
Mr. Asif Shah PET	DPE	GHSS Dandi Sarwan	Against the post already occupied by him
Mr. Asif Ali Khan PET	DPE	GHSS Dandi D I Khan	Against the post already occupied by him
Mr. Asif Israr PET	DPE	GHSS Lughad Mardan	Against the post already occupied by him
Mr. Asif Khan PET	DPE	Phy Educ College Karak	Against the post already occupied by him
Mr. Shah Mahmood PET	DPE	GHSS Ghani Payan Pesh	Against the post already occupied by him
Mr. Asif Zar Khan PET	DPE	GHSS Fatane Mardan	Against the post already occupied by him
Mr. Asif Shah PET	DPE	GHSS Laxmagal NSR	Against the post already occupied by him
Mr. Asif Khan PET	DPE	GHSS Umar Zai Chd:	Against the post already occupied by him
Mr. Asif Muhammad Din PET	DPE	GHSS Mazar Mardan	Against the post already occupied by him
Mr. Asif Shah PET	DPE	GHSS D I Tang Kohat	Against the post already occupied by him
Mr. Asif Shah PET	DPE	ADO (Phyl) at EDO (S&L) Tank	Against the post already occupied by him
Mr. Asif Shah PET	DPE	GHSS Khan, Far Abbottabad	Against the post already occupied by him
Mr. Asif Badshah PET	DPE	GHSS Lal Galla Lak	Against the post already occupied by him
Mr. Asif Muhammad Sattar PET	DPE	GHSS Hazar Khaym Pesh	Against the post already occupied by him
Mr. Asif Khan PET	DPE	GHSS Dandi Kohat	Against the post already occupied by him
Mr. Asif Faridi PET	DPE	GHSS No. 1 Peshawar city	Against the post already occupied by him
Mr. Asif Rehan PET	DPE	GHSS Tugh Bannu	Against the post already occupied by him
Mr. Asif Akber PET	DPE	GEC, D I, Mir Ali NWFA	Against the post already occupied by him
Mr. Asif Khan PET	DPE	GHSS Gomal Swabi	Against the post already occupied by him
Mr. Asif Khan PET	DPE	ADO (Phyl) at EDO (S&L) Charsadda	Against the post already occupied by him
Mr. Asif Khan PET	DPE	GHSS Shalimar Fort, Lak	Against the post already occupied by him
Mr. Asif Khan PET	DPE	ADO (Phyl) at EDO (S&L) Bannu	Against the post already occupied by him
Mr. Asif Khan PET	DPE	GHSS Baghicha, D I Mardan	Against the post already occupied by him
Mr. Asif Khan PET	DPE	GHSS Wazir Khan Karak	Against the post already occupied by him
Mr. Asif Khan PET	DPE	GHSS Dhanwan Charsadda	Against the post already occupied by him
Mr. Asif Khan PET	DPE	GHSS Aghori Peshawar	Against the post already occupied by him
Mr. Asif Khan PET	DPE	GHSS Khannu D I	Against the post already occupied by him
Mr. Asif Khan PET	DPE	GHSS Wazir Khan Peshawar	Against the post already occupied by him
Mr. Asif Khan PET	DPE	GHSS Wazir Khan Peshawar	Against the post already occupied by him
Mr. Asif Khan PET	DPE	GHSS Wazir Khan Peshawar	Against the post already occupied by him

(Handwritten signatures and stamps)

51	Mr. Habibullah PET	DPE	GEC (M) Dii	Against the post already occupied by him
52	Mr. Mujeeb Rehman PET	DPE	GHSS Shakar Dara Kohat	Against the post already occupied by him
53	Mr. Jehan Agha PET	DPE	ADO (Phy:) at EDO(S&L) Shangla	Against the post already occupied by him
54	Mr. Abdul Qadeer Khan PET	DPE	GHSS, Parawa D.I.Khan	Against the post already occupied by him
55	Mr. Chamni Khan PET	DPE	GHSS, Tarkar GHSS Mardan	Against the post already occupied by him
56	Mr. Amjad Khan PET	DPE	GHSS Sherpao Charsadda	Against the post already occupied by him
57	Mr. Nikhat ullah PET	DPE	GEC (M) Kotla Habibullah FR Bannu	Against the post already occupied by him
58	Mr. Farid Zaman C.T.	DPE	Phy: Edu: Collage Karak	Against the post already occupied by him
59	Mr. Ikramullah PET	DPE	GHSS Sirkot Haripur	Against the post already occupied by him
60	Mr. Muhammad Usman PET	DPE	GHSS Muryali D.I.Khan	Against the post already occupied by him
61	Mr. Waris Khan P.T.C.	DPE	GHSS Munda Dir Lower	Against the post already occupied by him
62	Mr. Muhammad Nawaz PET	DPE	GHSS Shahbaz Gajari Mardan	Against the post already occupied by him
63	Mr. Ihsan Ullah PET	DPE	GHSS Fatehpur Swat	Against the post already occupied by him
64	Mr. Ashraf Ali Khan PET	DPE	GHSS Ustanzai Kohat	Against the post already occupied by him
65	Mr. Zahoor Zaman P.T.C.	DPE	GHSS Kalam Swat	Against the post already occupied by him
66	Mr. Fateh Sher PET	DPE	GHSS Kabal Swat	Against the post already occupied by him
67	Mr. Muhammad Sharif PET	DPE	GHSS Kot Najibullah H/Pur	Against the post already occupied by him
68	Mr. Said Khan PET	DPE	GHSS Lora Abbottabad	Against the post already occupied by him
69	Mr. Ghulam Hussain PET	DPE	GEC(M) Mardan	Against the post already occupied by him
70	Mr. Ghulam Nabi PET	DPE	GHSS Takh Bhai Mardan	Against the post already occupied by him
71	Mr. Muhammad Gul PET	DPE	GHSS No.2 D.I.Khan	Against the post already occupied by him
72	Mr. Raeesullah P.T.C.	DPE	GHSS Charbagh Swat	Against the post already occupied by him
73	Mr. Nasir Khan PET	DPE	ADO (Phy:) at EDO (S&L) Hangu	Against the post already occupied by him
74	Mr. Zahoor Ahmad PET	DPE	GHSS Jallozai Nowshera	Against the post already occupied by him
75	Mr. Muhammad Haroon PET	DPE	GHSS Ismaili Swabi	Against the post already occupied by him
76	Mr. Muhammad Iqbal PET	DPE	GHSS Turbela T. Ship H/Pur	Against the post already occupied by him
77	Mr. Farmanullah PET	DPE	GHSS Pir Pai Nowshera	Against the post already occupied by him

Note: - 1. Charge report should be submitted to all concerned.
2. No TA/DA etc. are allowed.

(JIAFIZ BAHADAR KHAN)
Director Schools & Literacy
NWFP Peshawar

Encls No. 3542-3628 1A-14/Promo:/DPE B-16.

Dated Peshawar the 18/2

Copy of the above is forwarded for information & necessary action to the: -

1. Director of Education (FATA) NWFP Peshawar.
2. Director Bureau and Teacher Education NWFP Abbottabad.
3. Accountant General NWFP Peshawar.
4. Executive District Officers (Schools & Literacy) in NWFP.
5. District/Agency Accounts Officers in NWFP.
6. Principal GEC (M) concerned.
7. Principal Govt. College of Physical Education Karak.
8. Principal GHSS concerned.
9. PS to Minister for Education NWFP Peshawar.
10. PS to Secretary Schools & Literacy Department Govt. of NWFP Peshawar.
11. DPE/ADO Physical concerned.
12. PA to Director Schools & Literacy NWFP Peshawar.

Attested
JIAFIZ BAHADAR KHAN
Director Schools & Literacy
NWFP Peshawar

Deputy Director Establishments
Directorate Schools & Literacy
NWFP Peshawar

Annex B 16
8

OFFICE OF THE DIRECTOR SECONDARY EDUCATION NWFP, PESHAWAR.

NOTIFICATION.

The following qualified SDPE Teachers/Physical Supervisors, serving in the Education Department in NWFP/FATA due for promotion on seniority Basis are hereby adjusted against the posts of D.P.E.s/A.D.E.O.(Phy:) in their own pay and Scale as the exigency of service in the interest of public Service on the terms & conditions in vogue or the ones to be framed in future with immediate effect.

<u>S.No.</u>	<u>NAME & DESIGNATION</u>	<u>WHERE ADJUSTED</u>	<u>REMARKS</u>
1.	Muhammad Akram PET, GHSS, Dara-Pezu Lakki Marwat	GHSS, Ustarzai Kohat	Vacant Post
2.	Shor Azam Khan, PET GHS, Dara Baloch Tank	GHSS, Richban Abbottabad	-do-
3.	Siraj ul-Din PET, GHS, Acala Swat.	GHSS, Khawaza Khela Swat	-do-
4.	Mabid Ullah SET, GHS, Sheikh Uttar Tank.	GHSS, Darosh Chitral	-do-
5.	Ibrahim-ul-Din PET, GHS, Jandari Karak.	GHSS, Lachi Kohat	-do-
6.	Anwar Saad, PET, GHS, Fazal Shah Matta Khel Bannu.	GHSS, Bareela Hari Pur	-do-
7.	Bahadar Nawaz PET, GHS, Sufaid Dheri Peshawar.	GHSS, No.2. Peshawar Cantt:	-do-
8.	Falek Naz PET, GHS, Jaw Khawar Mardan	GHSS, Manga Dargai Charsadda	-do-
9.	Noor-ul-Jain Physical Supervisor P.W.S.	GHSS, Khair Abad Nowshera	-do-
10.	Deedar Khan PET, GHSS, Dhuriani Peshawar.	GHSS, Chankani Peshawar	-do-
11.	Daud Khan PET, GHS, War Muhammad Lakki Marwat	GHSS, Madyan Swat	-do-
12.	Muhammad Jalal PET, GHS, Chori Wala Bannu.	GHSS, Kakki Bannu	-do-
13.	Abdul Sattar PET, GHS, Gul Imam Tank.	GHSS, Gul Imam Tank	-do-
14.	Jamal Abdul Masur PET, GHSS, Bannu.	GHSS, Totakan Malakand Agency	-do-
15.	Muhammad Faisal Physical Supervisor Orkzai Agency	GHSS, Bari Kot Swat	-do-
16.	Muhammad Naseem, PET GHS, Labour Colony Mardan	GHSS, Gari Kapura Mardan	-do-
17.	Shawana Nayat PET, GHS, No.1. Siba Kot MKD	GHSS, Kot Malakand Agency	-do-
18.	Bashir Ahmad PET, GHS, Pahar Khel Lakki Marwat	GHSS, Dousara Charsadda	-do-
19.	Ali Bad Shah PET, GHS, Parshai Kohat	GHSS, Gumbat Kohat	-do-
20.	Sajid Firdus PET, GHS, Jangi A-Abad.	GHSS, Bignotar A-Abad	-do-
21.	Muhammad Sharaf PET, GHSS, Dara-Pezu Lakki Marwat.	G.E.C.(M) A-Abad	-do-
22.	Aqal Daraz PET, PE GHS, Shah Salim Kohat	GHSS, Tough Bala Kohat	-do-
23.	Aziz Ullah PET, GHS, No.1. Pahar Pur D.I.Khan.	GHSS, Kat Garh D.I.Khan	-do-

SYED YOUSUF KHAN
M.A., L.B., B.Ed. Certificate: Basic Eng
Advocate High Court Peshawar
Federal Shariat Court.

29/6

24,	Abdul Majeed Physical Supervisor Khyber Agency.	G.E.C. (M) Peshawar	Vacant Post
25,	Mohib Ullah PET, GHS, Nurar Bannu.	GHSS, Nizam Pur Nowshera	-do-
26,	Muhammad Saeed Shah PET, GHS, Paras Mansehera.	ADEO(Phy:) O/O DEO(M/S) Mansehera	-do-
27,	S. Bakht Shah PET, GHS, Mansabdar Swabi	GHSS, Zaida Swabi	-do-
28,	Hamid Ullah Khan PET, GHS, Kotla Lodhian D.I.Khan	GHSS, Maryali D.I.Khan	-do-
29,	Muhammad Israr PET, GHS, Alo Kili Mardan	GHSS, Dakki Charsadda	-do-
30,	Shams-ur-Rehman PET, GHSS, Sher Pur Mansehera	GHSS, Sher Pur Mansehera	-do-
31,	Muhammad Farooq PET, GHS, Landi-Wah Lakki Marwat	GHSS, Adhrai Peshawar	-do-
32,	Nameem Khan PET, GHS, Bannu.	Govt: Elementary College H/Pur Gdo	-do-
33,	Shah Mehmood PET GHS, Ghori Wala Bannu.	GHSS, Umar Payan Peshawar	-do-
34,	Tali Zar PET, GHSS, Kot Long Mardan	GHSS, Kot Long Mardan	-do-
35,	Rais Khan PET, GHS, Landi Khan Khel Lakki Marwat.	GHSS, Khesgai Peshawar NSR	-do-
36,	Inayat Khan PET, GHS, No.1. Rajjar Ghd:	GHSS, Umar-zai Charsadda	-do-
37,	Sardar Khan PET, GHS, Kharghali Khyber Agency.	GHSS, Palai Malakand Agency	-do-
38,	Intishan-ud-Din PET, GHS, Ghundi Kili Karak	GHSS, Billi Tang Kohat	-do-
39,	Abdullah Shah PET, GHS, No1. Tank	GHSS, Akbar Pura Nowshera	-do-
40,	Gul Bad Shah PET, GHSS, No.4, Peshawar City	GHSS, Hazar Khani Peshawar	-do-
41,	Muhammad Nawaz PET, GHS, Banwal Tank.	GHSS, Somar Bagh Dir	-do-
42,	Rukh Niaz PET, GHS, Wanda Urungzeb Lakki Marwat	GHSS, Khan Pur A-Abad	-do-
43,	Abdul Ghaffar PET, GHS, Lalozai Bannu.	GHSS, Lal Qila Dir	-do-
44,	Murtaz Khan PET, GHS, Abdul Lakki Marwat.	GHSS, Dhodial Mansehera	-do-
45,	Muhammad Safdar PET, GHSS, Karak.	GHSS, Doaba Kohat	-do-
46,	Safdar Jan PET, G.F.H.S Peshawar City.	GHSS, No.1. Peshawar City	-do-
47,	Fazal-e-Rabi PET GEC(M) Swabi	G.E.C.(M) Swabi	-do-
48,	Khaki Rehman Ic/DPE GEC(M) Mirali NWA	GEC(M) Mirali NWA	-do-
49,	Muhammad Iqbal Physical Supervisor Muhmend Agency.	GHSS, Utmanzai Ghd:	-do-
50,	Roshan Akbar PET; GHS, Dagal Swabi	GHSS, Gandaf Swabi	-do-
51,	Habib Ullah PET, GHS, Sawal Dher Mardan	A.D.E.O(Phy:) O/O DEO(M/S) Charsadda	-do-
52,	Lal Mar. Jan PET, GHS, Shaidan Banda Karak.	GHSS, Shabqadar Fort Ghd:	-do-

A-2000-01-01-01

GHS, Nurar Bannu

10

	Para.No.3.		
3.	Khawazalat Khan PET, GHS, Surgha SWA.	GHS, Ziarat Talash Dir	Vacant Post
4.	Ahmad Nawaz PET, GHS, Shabaz Ahmad Khel Bannu.	GHS, Darband Manshera	-do-
5.	Zarbakht Khan PET, GHS, No.7. Buner. (B-1)	GHS, Nawagai Buner	-do-
6.	S. Ibad Ur Rehman PET, GHS, K Lakrand Muhammad Agency.	GHS, Geh Dir	-do-
7.	Kiramati Ullah PET, GHS, T. Nasrati Karak.	GHS, Bogara Karak.	-do-
8.	Salar Khan PET, GHS, Gujrat Mardan	GHS, Risai Pur NSR	-do-
9.	Rashi Pin PET, GHS, Paloski Karak.	GHS, Wavara Karak	-do-
10.	S. Jaganl Abbas Saidi PET, GHS, Kachi Pind Khan D.I.Khan	GHS, Khan Pur Dir	-do-
11.	Falak Naz PET, GHS, Dhori Saidan Bannu.	G.E.C.(Tahar) Malakand Agency	-do-
12.	Fazal Wahid PET, GHS, Chakdara Dir.	GHS, Bat Khola Malakand Agency	-do-
13.	Mushtaq Khan PET, GHS, Mandan Bannu.	GHS, Mathra Peshawar	-do-
14.	Arbab Fawad Khalid PET, GHS, Pir Pai NSR	GHS, Pir Pai NSR	-do-
15.	Habib Ullah PET, GHS, No.1. Bannu.	G.E.C.(M) Dir.	-do-
16.	Majeed Ur Rehman PET, GHS, Ghundi Shamsahai Karak	GHS, Shakar Para Kohat	-do-
17.	Munammad Javed PET, GHS, Nazwan Sher A-Abad.	AEDO(Phy:) O/O DEO (M/S) Abbottabad	-do-
18.	Jehan Alan PET, GHS, Topi Buner.	GHS, Mingora Swat	-do-
19.	Abdul Qasoor Khan PET, GHS, Dalwal D.I.Khan	GHS, Dhakki D.I.Khan	-do-
20.	Chamni Khan PET, GHS, Khan Pur Mardan.	GHS, Kab Gani Swabi	-do-
21.	Amjad Khan PET, GHS, Ziarat Kili Chd:	GHS, Sher Pao Chd:	-do-
22.	Nekmat Ullah PET, Ic/DFE GEC(M) Kotka Habib Ullah FR Bannu.	GEC(M) Kotka Habib Ullah FR Bannu.	-do-
23.	Faris Aman. CT GHS, Malsani Bannu.	G.E.C (M) Mathra Peshawar	-do-
24.	Muhammad Usman PET, GHS, No.3. D.I.Khan	GHS, Darthru Kulan D.I.Khan	-do-
25.	Waris Khan PTC GHS, Saqi Zaman Dulo Khel Bokki Marwat	GHS, Munda Dir	-do-
26.	Muhammad Nawaz PET, GHS, Nawaz Kili Swabi.	GHS, Shabaz Garhi Mardan	-do-
27.	Ihsan Ullah PET, GHS, Buzara Swat.	GHS, Fatch Pur Swat	-do-
28.	Ashraf Ali PET, GHS, Ismail Khel Bannu.	GHS, Bircote A-Abad	-do-
29.	Zahoor Zaman PET, GHS, Kool Khel Bannu.	GHS, Kalam Swat	-do-
30.	Tawab Ali Shah PET GHS, Mana Khel Banochi Bannu.	GHS, Farbola Town Ship Bari Pur	-do-
31.	Fatch Sher PET, GHS, Wanda Baloch D.I.Khan.	GHS, Kabal Swat	-do-

GHS, Mathra Peshawar
 GHS, Bircote A-Abad
 GHS, Fatch Pur Swat
 GHS, Kabal Swat
 GHS, Farbola Town Ship Bari Pur
 GHS, Mana Khel Banochi Bannu
 GHS, Wanda Baloch D.I.Khan

11

82.	Muhammad Sharif PET, GHS, Kotla D.I.Khan.	GHS, Kot Najeeb Ullah Hari Pur	Vacant
83.	Said Khan PET, GHS, Toran (NAU) Tank.	GHS, Lora A-Abad	-do-
84.	Q. Iqram Ullah PET, GHS, Bazar Ahmad Bannu.	GHS, Bagh Maidan Dir	-do-
85.	Ghulam Hussain PET, GHS, Rustan Mardan.	GHS, Fotalai Buner	-do-
86.	Ghulam Nabi PET, GHS, Gujar Ghori Mardan	GHS, Pir Saddi Mardan	-do-
87.	Muhammad Gul PET, GHS, No.2. D.I.Khan.	GHS, No2, D.I.Khan	-do-
88.	Enis Ullah PET, GHS, Sikotri Jabbar Bannu.	GHS, Charbagh Swat	-do-
89.	Nasir Khan PET, GHS, Bahaduri D.I.Khan	GEC(M) Mansehra	-do-
90.	Zahoor Ahmad PET, GHS, Spin Khak NSR.	GHS, Jalezal Nowshera	-do-
91.	Muhammad Farooq PET, GHS, Ismaila Swabi	GHS, Peshawar Swabi	-do-
92.	Muhammad Iqbal PET, GHS, Zangi Khel Lakki Marwat.	GHS, Natiagali A-Abad.	-do-
93.	Farman Ullah PET, Kotka GHS, Kotka Saadat Khwa Bannu.	GHS, Hawan Sher A-Abad	-do-
94.	Iqram Ullah PET, GHS, Kachozai Bannu.	GHS, Siri Kot Hari Pur	-do-

Notes:-

1. Charge report should be submitted to all concerned.
2. The promotion of the above candidates is subject to the approval of the Departmental Selection Committee.

(S. ABU SAIED BACHA)
Director Secondary Education
NWFP, Peshawar.

Dist: No. 9189-0439 /

Dated: 30-08- /2000.

Copy forwarded for information and n/action to the:-

1. Director Bureau of Coun: Dev: & Edu: Extension Services NWFP, Abbottabad.
2. Director of Education PNPA NWFP, Peshawar
3. Director Primary Education NWFP, Peshawar.
4. Accountant General NWFP, Peshawar.
5. All District Education Officers concerned Secondary and Primary Male in NWFP.
6. Agency Education Officers concerned.
7. All District Account Officers concerned in NWFP.
8. All the Principals / Head Masters concerned in NWFP.
9. P/S to Secretary to Govt: of NWFP, Education Department.
10. P-A to Director Secondary Education NWFP, Peshawar.

Dputy Director
for/ Director Secondary Education
NWFP, Peshawar.

Jax. Shor
30082000

(Signature)
SYED YOUSUF JAN
B.A., LL.B. & LL.M. (Hons.)
Advocate High Court Peshawar.
Federal Shariat Court.

30/8/20