

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 2005/2022

Mr. Muhammad Uzair Ali, Management Cadre Officer (BPS-19), Posted as District Education Officer (M), District Khyber.....(Appellant)

VERSUS

The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, and others.....(RESPONDENTS)

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Dated: 13/12/23

(Jaffar Mansoor Abbasi)

BS-19 officer of MC/ Respondent No.6

(Awaiting Posting)

Through its Counsel

Zahid Waqar Khan ADVOCATE

(Peshawar High Court, Abbottabad Bench)

15-1-24

Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 2005/2022

Mr. Muhammad Uzair Ali, Management Cadre Officer (BPS-19), Posted as District Education Officer (M), District Khyber..... (Appellant)

VERSUS

- 1. The Government of Khyber Pakhtunkhwa through the Chief Secretary, Khyber Pakhtunkhwa, & Other(RESPONDENTS)

Reply/Comments on Behalf of Respondent No.6

Khyber Pakhtunkhwa
Service Tribunal
Diary No. 9878
Date 13-12-2023

Respectfully Sheweth,

That the appellant has filed this service appeal under section 4 of the Services Tribunal Act, 1974 against the impugned Seniority List Dated: 12-10-2021 etc., which needs reply and the same as under.

Preliminary Objections:

- 1. The appellant has no cause of action to file the present service appeal against the respondent.
- 2. The appellant's seniority was determined in 2012.
- 3. The service appeal is time barred.
- 4. The appellant has hidden important information from the honorable Tribunal in the service appeal.
- 5. The Seniority List-2012 of management cadre officers was kept intact by the Peshawar High Court in WP No 362/2013 and WP No 2049/2014, which were filed by an officer selected against Category A (Open Market Quota).
- 6. The service appeal and material placed at file are against law and facts.
- 7. The appellant has not come to the honorable Tribunal with clean hands.
- 8. The appellant has suppressed some important material and facts from the honorable Tribunal.
- 9. The appellant is estopped by his own conduct to bring the present service appeal against the respondents.

Para-Wise Factual Objections:

- 1. Need no comments.
- 2. Correct.

3. Correct.
4. Need no comments.
5. Need no comments.
6. Correct
7. Need no comments.
8. Incorrect. The KP Public Service Commission communicated revised merit of EDOs (BS-19), separately for Category A and B selectees of advertisement No 05/2009 vide consolidated letter No.5575 Dated: 10-02-2012 (**ANNEX-A**). All selected officers under Category A (Open Market Quota) were declared junior to officers selected against Category B (Teaching Cadre Quota) in the Seniority List notified in 2012 (**ANNEX-B**).
9. Incorrect. Para No. 8 above contains contradictory statement to that of Para No. 9. How come the seniority be notified on 08-05-2012 based on a letter issued by the KP Public Service Commission on 02-12-2013?

The Para-9 of the appeal is correct to the extent that the name of the appellant was not mentioned by the time the seniority was notified in 2012 but the order of seniority would not change even inclusion of name on the later stage.

10. Incorrect. The appellant's appeal on the seniority was rejected by Department (**ANNEX-C**) and the appellant kept this fact hidden from the honorable Services Tribunal.
11. Need no comments.
12. Incorrect. The impugned tentative seniority list of BS-19 Management Cadre Officers as it stood on 12-10-2021 (**ANNEX-D**) is a defective document, as not issued by the competent authority. Anyhow, the seniority order of serial No 1-5 is correct being based on the seniority notified in 2012.
13. Incorrect. The appellant is referring to some document of the Public Service Commission dated 02-12-2013 as Seniority List which is totally incorrect.

It is pertinent to mention that only 05 officers of BS-19 are left in service today from the Seniority List 2012 of EDOs (BS-19). The 22 officers are no more part of the seniority List 2012 as per detail below:

- i) 05 officers were promoted to BS-20 in three different meetings of Provincial Selection Boards (PSB).
- ii) 16 retired on superannuation.
- iii) One officer excluded due to in-service death. So, there are only 05 serving BS-19 officers left, out of 27 selected EDOs (BS-19), including the appellant and both the Respondent No. 6 & 7. The fact is that the appellant's seniority was determined in 2012 and he would fall to Serial No.25 of the Seniority List 2012.

14. The impugned tentative seniority list 12-10-2021 is a defective document, as not issued by the competent authority. Recently, a tentative seniority of BS-19 officers of management cadre has been issued (**ANNEX- E**) by the E&SE Department, being competent authority.

15. Need no comments.

16. Correct.

17. Need no comments.

18. Incorrect, the authority notified the seniority list vide Notification SO(S/M) SED/4-25/2012/Final Seniority list of MC(BS-19) dated 08-05-2012, whereas the appellant has concealed the fact from this honorable Tribunal regarding rejection of his departmental appeal in 2019.

19. Incorrect. The seniority of the appellant and the Respondent No. 6 & 7 had already been determined and accordingly notified in 2012. The appellant was selected in 2010, appointed in 2011, seniority notified in 2012, departmental appeal rejected in 2019, and filing service appeal in 2023 is beyond logic and understanding.

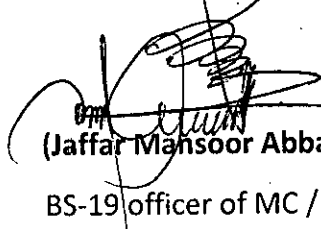
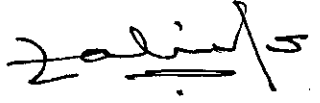
The service appeal of the appellant is not maintainable on the following grounds that:

- i) The Peshawar High Court rejected the claim, made through WP NO 362/2013 and WP 2049/2014, filed by Mr. Ghulam Qasim, an officer selected as EDO (BS-19) under Category A (Open Market Quota), the category of selection to which the appellant belongs too.

- ii) 05 Officers of the Seniority List 2012 were promoted to BS-20, and 16 officers got retired.
- iii) Twelve years have elapsed to the approved & notified Seniority List 2012 of BS-19 Management Cadre Officers, thus making it time barred.
- iv) The appellant made the same plea as was taken up in WP. 362/2013 and 2049/2014.
- v) The appellant's appeal to the Govt. was rejected in 2019.
- vi) The appellant files appeal to all new Secretaries and Chief Secretaries to avail benefit of doubt.
- vii) Seniority of Respondent No. 6 is final & undisputed as per seniority list 2012.
- viii) The impugned seniority has no legal binding, as not issued by the competent authority.

Thus, the only reason for the instant service appeal is to delay the process of law and to deny the valuable right of the Respondent No.6. It is very humbly requested that the instant service appeal ^{graciously} ~~should~~ be dismissed at special cost.

Dated: 13/12/23


 (Jaffar Mansoor Abbasi) Private
 BS-19 officer of MC / Respondent No.6
 Awaiting Posting
 Through its Counsel 
 Zahid Waqar Khan ADVOCATE
 (Peshawar High Court, Abbottabad Bench)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 2005/2022

Mr. Muhammad Uzair Ali, Management Cadre Officer (BPS-19), Posted as District Education Officer (M), District Khyber.....(Appellant).

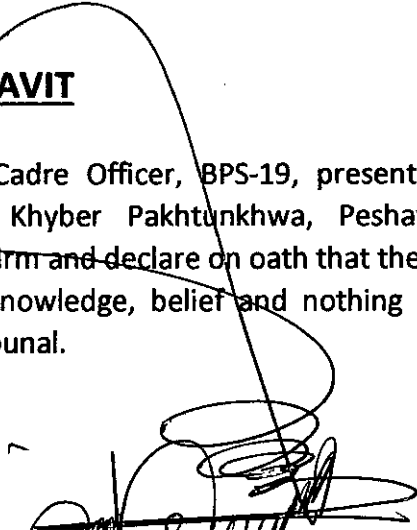
VERSUS

1. The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, and others.....(RESPONDENTS).

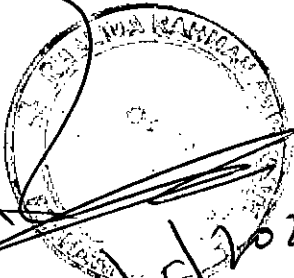
AFFIDAVIT

I, Jaffar Mansoor Abbasi, Management Cadre Officer, BPS-19, presently at the disposal of the Directorate of E&SE, Khyber Pakhtunkhwa, Peshawar, the Respondent No. 06, do hereby solemnly affirm and declare on oath that the contents of reply are correct to the best of my knowledge, belief and nothing has been concealed from this honorable Services Tribunal.

Dated: 30-05-2023


(Jaffar Mansoor Abbasi)
MC officer (BS-19)/ Respondent No 6
Awaiting Posting

ATTESTED


30/05/2023

Telephone: 9213750



From: Secretary
Khyber Pakhtunkhwa, Public Service Commission
Peshawar

To: The Secretary to Govt. of Khyber Pakhtunkhwa,
Elementary and Secondary Education
Peshawar

005575

Dated 10/02/2012

Subject:- REVISED MERIT OF EXECUTIVE DISTRICT OFFICER
(B-19) OF ADVERTISEMENT NO.05/2009.

Dear Sir,

I am directed to refer to your letter No.1044 Dated 12.01.2012 on the subject cited above and to enclose herewith a revised merit in respect of Executive District Officer (B-19) for information and further necessary action.

Yours faithfully

AS

(Manzil Badshah)
Director Recruitment
08.02.2012

CTC
2012/12

9/13/12

505.7

8/13/12

13/02
1374/12

Secretary
Khyber Pakhtunkhwa
Elementary and Secondary
Education Department
Peshawar
Date: 10/02/2012

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KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION

REVISED MERIT OF EXECUTIVE DISTRICT OFFICER (B-19) OF
ADVERTISEMENT NO.05/2009.

Merit Order	Name with Father's Name	Domicile/Zone
A. Category-A (Open Merit) Open Market as per rules		
1.	Ghulam Qasim Khan S/O Abdul Majeed Khan	D.I.Khan/4
2.	Abdul Malik S/O Muhammad Mushtaq	D.I.Khan/4
3.	Umar Khan S/O Muhammad Hussain	Tank/4
4.	Shomas Khan S/O Mir Ahmad Khan	Gadoon/3
5.	Abdus Salam S/O Hameed Ullah Jan	D.I.Khan/4
6.	Abdul Basit S/O Qavi Ullah	Peshawar/2
7.	Siraj Muhammad S/O Muhammad Khan	Peshawar/2
8.	Muhammad Uzair Ali S/O Abdul Qayyum	Swabi/2
9.	Nazir Khan S/O Gul Payo Khan	Karak/4
10.	Sahibzada Hamid Mahmud S/O Mahmud ul Hassan Akhtar	Peshawar/2
B. Category-B (Teaching Cadre)		
1.	Bashir Hussain Shah S/O Taj Hussain Shah	Haripur/5
2.	Muhammad Rafiq S/O Niaz Khanjan	Karak/4
3.	Peroz Hussain Shah S/O Sultan Ali Shah	D.I.Khan/4
4.	Abdur Rashid S/O Ghulam Jaffar	D.I.Khan/4
5.	Muhammad Ibrahim S/O Ishtiaq Jambler	Dir/3
6.	Sultan Mahmood Mian S/O Mumtaz	Swabi/3
7.	Roz Wali Khan S/O Jonaid Noor	Karak/4
8.	Gohar Ali Khan S/O Muhammad Ali Khan	Peshawar/2
9.	Abdullah S/O Mir Azam	MKD Agy/3
10.	Muhammad Riaz S/O Ghulam Khan	Manshera/5
11.	Jehan Muhammad S/O Sultan Muhammad	Nowshera/2
12.	Muhammad Shoukat S/O Abdul Jalil	Manshera/5
13.	Haziq ur Rehman S/O Sarwar Jan	Karak/4
14.	Jaffar Mansoor Abbasi S/O Qaibur Rehman Abbasi	Abbottabad/5
15.	Zia ud Din S/O Ghulam Mubiy ud Din	L.Marwa/4
16.	Atta Ullah Khan S/O Muhammad Nawaz Khan	L.Marwa/4

CTC
20/10/09

Attested
20/10/09

ANNEX-B

FINAL SENIORITY LIST OF OFFICERS III & IV DISTRICT OFFICERS/ADDITIONAL DISTRICT OFFICERS/ADDL DIR ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT MANAGEMENT CADRE AS IT STOOD ON 22-02-2012.

S.N	NAME OF OFFICERS WITH DESIGNATION	Date of Birth	Domicile	Date of 1st Apptt in Edu; Deptt;	Date of Apptt/Promo tion as EDO /Addl Dir	Method of Recruitment	Remarks
1	Mr. Bashir Hussain Shah Additional Director (E&SE) Peshawar	10.01.1957	Haripur	01.12.1975	24.02.2011	Direct Selectee against 60% Departmental Quota	
2	Mr. Muhammad Rafique Additional Director (E&SE) Peshawar	14.02.1958	Karak	09.08.1978	24.02.2011	-do-	
3	Mr. Feroz Hussain Shah EDO (E&SE) Peshawar	25.10.1954	DIKhan	11.11.1975	24.02.2011	-do-	
4	Mr. Abdur Rashid EDO (E&SE) Peshawar	15.05.1957	DIKhan	24.06.1978	24.02.2011	-do-	
5	Mr. Muhammad Ibrahim EDO (E&SE) Peshawar	16.03.1953	Dir Lower	10.02.1988	24.02.2011	-do-	
6	Mr. Sultan Mehmood Khan EDO (E&SE) Peshawar	21.12.1955	Swat	20.12.1983	24.02.2011	-do-	
7	Mr. Rox Wali, EDO (E&SE) waiting for posting	10.04.1957	Karak	01.12.1988	24.02.2011	-do-	
8	Mr. Raz Wali, EDO (E&SE) waiting for posting	01.01.1967	Peshawar	22.04.1990	24.02.2011	-do-	
9	Gohar Ali Khan EDO (E&SE) Peshawar	02.09.1956	Malakand	04.03.1984	24.02.2011	-do-	
10	Mr. Abdullah, EDO (E&SE) Shangla	02.05.1960	Mansehra	24.05.1988	24.02.2011	-do-	
11	Muhammad Riaz EDO (E&SE) Abbottabad	04.01.1961	Nowshera	26.10.1986	24.02.2011	-do-	
12	Jehan Muhammadi EDO (E&SE) Hanau	06.02.1962	Karak	01.09.1985	24.02.2011	-do-	
13	Hasid ur Rahman EDO (E&SE) Karak	15.09.1968	Abbottabad	11.02.1999	24.02.2011	-do-	
14	Jaffar Mansoor Abbasi Working as Prl GHS No.1 Abbottabad	01.09.1970	Lakki Marwat	01.09.2003	24.02.2011	-do-	
15	Zia ud Din EDO (E&SE) Dir Upper	18.03.1960	Lakki Marwat	16.02.1987	24.02.2011	Direct Selectee against 40% Open Market Quota	
16	Atta Ullah Khan EDO (E&SE) Charsadda	10.01.1956	DIKhan	03.11.1973	24.02.2011	-do-	
17	Mr. Ghulam Qasim Khan EDO (E&SE) Tank	07.01.1954	D.I. Khan	16.02.1977	24.02.2011	-do-	
18	Mr. Abdul Malik, EDO (E&SE) Lakki Marwat	12.02.1962	Tank	01.10.1986	24.02.2011	-do-	
19	Umar Khan EDO (E&SE) Mansehra	13.02.1954	Suabi	25.07.1975	24.02.2011	-do-	
20	Shamas Khan Additional Director (P&D) E&S Khyber Pakhtunkhwa	01.04.1962	D.I. Khan	09.10.1985	24.02.2011	-do-	
21	Abdul Salam EDO (E&SE) Suabi	20.04.1960	Peshawar	29.03.1988	24.02.2011	-do-	
22	Siraj Muhammad EDO (E&SE) Chitral	06.03.1959	Karak	24.10.1989	24.02.2011	-do-	
23	Nazir Khan EDO (E&SE) Kohat	06.09.1965	Peshawar	03.12.1989	24.02.2011	-do-	
24	Sahibzada Hamid Mehmood EDO (E&SE) Torghar						

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CHIEF SECRETARY,
KHYBER PAKHTUNKHWA

Endst: No. SO (S/M) E&SED/4-25/2012/Final Seniority List of MC (BPS -19): Dated Peshawar the, 08.05.2012.

- Copy of the above is forwarded for information to the :-
1. Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
 2. Director of Education (FATA) Khyber Pakhtunkhwa, Peshawar.
 3. Director (PITE) Khyber Pakhtunkhwa, Peshawar.
 4. Director Curriculum & Teacher Edu; Khyber Pakhtunkhwa, A/Abad.
 5. All the Executive District Officers (E&SE) in Khyber Pakhtunkhwa.
 6. All officers concerned.
 7. To be returned to Govt. of Khyber Pakhtunkhwa, (E&SE) Peshawar.

SECTION OFFICER (SCHOOLS/MALN)

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ANNEX-B
Page 9



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT
NO.SO(S/M) E&SED/4-25/2012/Final Seniority List of MLC (BS-19)
Dated Peshawar the August 26th, 2019

1. Mr. Umar Khan Kundi, DEO (Male) Hari Pur.
2. Mr. Abdus Salam, DEO (Male) Tank.
3. Mr. Siraj Mohammad DEO (Male) Malakand.
4. Mr. Abdul Basit, Principal GHSS Agra, Charsadda.
5. Mst. Samina Altaf, DEO (Female) Haripur.
6. Sahibzada Hamid Mahmood, Addi: Director Directorate of (E&SE) Peshawar.
7. Mohammad Uzair Ali, Addi: Director Directorate of (E&SE) KP, Peshawar.

FILING OF APPEAL FOR RACTIFICATION AND INCLUSION OF THE NAMES IN THE SENIORITY LIST OFFICERS OF MANAGEMENT CADRE BS-19 IN THE ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA

I am directed to refer to the subject cited above and to convey in continuation of this Department letter NO.SO(S/M) E&SED/4-25/2012/Final Seniority List of MLC (BS-19) dated May 8th, 2012, that the competent authority (the Chief Secretary Khyber Pakhtunkhwa) has filed your appeals against the final seniority list issued vide this Department notification of even No. of dated May 8th, 2012 being time barred and already decided and closed case.

I am further directed to convey that the competent authority in the E&SED has taken serious notice of the submission of appeal direct to the Chief Secretary Khyber Pakhtunkhwa (Competent Authority) and ignoring the administrative channel. You all are therefore directed in your own interest to be careful in future and all sorts of correspondence be made through proper channel.

Shafiq
26/8/2019
(SHAFIQ)
SECTION OFFICER (SCHOOLS MALE)

Ends: of Even No. & Date:

Copy forwarded to the:-

- 1- Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar, with the direction to submit the revised seniority list by including names of all the officers at the earliest.
- 2- PSO to Chief Secretary, Khyber Pakhtunkhwa.
- 3- P.S to Secretary to Government of Khyber Pakhtunkhwa, Establishment Department.
- 4- P.S to Secretary to Government of Khyber Pakhtunkhwa, (E&SE) Department.
- 5- Office order file.

Shafiq
SECTION OFFICER (SCHOOLS MALE)

Rest
Has

etc
26/8/19

REVISED AND UPDATED (FINAL) Seniority list of Officers BPS-19 (District Education Officers/Additional Directors) E&SE Department (Management Cadre) as it stood on 12/10/2021

Name of Officer with Designation	Date of Birth	Domicile	Date of 1st applt in Educ Deptt.	Date of Applt/From as D.E.O/Addl. Dir.	Method of recruitment	Remarks
1. Muhammad Shaukat, District Education Officer (M) Abbottabad	15-10-62	Manahra	22-08-82	26-06-12	Direct selectee against 00% Departmental Quota	No SO(SM)E&SED/3-2/2012/Recruitment of DDOs/Add.Direc (BS-19) dated 26.06.2012
2. Jaffer Mansoor Ali (Director DCTE in OPS)	15-09-68	Abbottabad	11-12-93	24-02-11	do	No SO(SM)E&SED/3-2/2011/EDOs/EXIC (BS-19) dated 24.02.2011
3. Ms. Samina Ahsan District Education Officer (F) Mardan	12-03-65	Haripur	25-13-01	27-01-13	do	No SO(S/F)E&SED/3-2/2014/(Female) (BS-19) dated 27.01.2013
4. Abdul Nasir, Principal GHS Agru Payan Charsadda	20-10-73	Peshawar	22-01-98	26-06-12	Direct selectee against 40% Open Market Quota	No SO(SM)E&SED/3-2/2012/Recruitment of DDOs/Add.Direc (BS-19) dated 26.06.2012
5. Muhammad Usur Ali DDO Dir Lower.	08-03-69	Swabi	05-11-93	24-02-11	do	No SO(SM)E&SED/3-2/2011/EDOs/EXIC (BS-19) dated 24.02.2011
6. Sahibzad Muhammad Mahmood, Services placed at the disposal of Directorate E&SE.	06-09-65	Peshawar	03-12-89	24-02-11	do	No SO(SM)E&SED/3-2/2011/EDOs/EXIC (BS-19) dated 24.02.2011
7. Sheraz Ahmed DDO (M) Karak.	10-03-1970	Swabi	17-02-2000	12.01.2021	By promotion	No SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021
8. Iqbal Khan Additional Director Estab E&SE.	12-12-1972	Peshawar	31-03-1997	12.01.2021	By promotion	No SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021
9. Muzaffar Ali Khan DDO (M) Chitral Lower.	01-01-1973	Shangla	05-01-1999	12.01.2021	By promotion	No SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021
10. Muhammad Ashraf DDO (M) Dir Upper.	31-03-1971	Haripur	03-07-1997	12.01.2021	By promotion	No SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021
11. Hafiz Muhammad Nawaz DDO (M) Haripur.	31-12-1968	Abbottabad	10-07-1990	12.01.2021	By promotion	No SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021
12. Muhammad Anis DDO (M) Kohistan Upper.	07-02-1970	Swat	15-01-1998	12.01.2021	By promotion	No SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021
13. Muhammad Azam Khan Dy. Managing Director Merged area Education Foundation (MAEF)	15-05-1965	Charsadda	22-01-1991	12.01.2021	By promotion	No SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021
14. Musarrat Hossain Khan DDO (M) D.I. Khan.	25-10-1973	D.I. Khan	05-11-1996	12.01.2021	By promotion	No SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021
15. Dr. Anisah DDO (M) Malakand.	01-04-1972	Charsadda	02-07-1997	12.01.2021	By promotion	No SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021

Merit score/order of KPSC has not been shown.

(Handwritten signatures and initials)

48-

5

CTC
2022

	Name of Officer with Designation	Date of Birth	Domicile	Date of 1st applt. in Edu. Deptt.	Date of Applt./Prom as D.E.O/Addl. Dir.	Method of recruitment	Remarks
16	Muhammad Riaz DEO(M) Swat.	15-04-1974	Malakand	16-05-1994	12.01.2021	By promotion.	No.SO(SM)E&SED/3-1/2021/Promotion of BS-1 (Management Cadre) dated 12.01.2021
17	Sajjad Akhtar Iqbal, Additional Director (P&D)E&SE.	03-03-1971	Swabi	01-06-1995	12.01.2021	By promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-1 (Management Cadre) dated 12.01.2021
18	Muhammad Sheraz DEO(M) Hangu.	04-01-1975	Karak	22-11-2000	12.01.2021	By promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-1 (Management Cadre) dated 12.01.2021
19	Zahid Muhammad Services placed at the disposal of Directorate E&SE.	14-06-1971	Peshawar	11-05-1996	12.01.2021	By promotion	No.SO(SM)E&SED/3-1/2021/Promotion of BS-1 (Management Cadre) dated 12.01.2021

Certificate:

- It is certified that the above seniority list is:
1. Widely Circulated.
 2. Un-disputed/Un-Controversial
 3. No Legislation is pending/involved.

Zu

08/1/22
 Deputy Director (Estab)
 Elementary and Secondary Education
 Khyber Pakhtunkhwa, Peshawar

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223533

ANNEX-E

Page (13)

No. SO (MC)E&SED/4-24/2023/Tentative Sen. List MC BS-19(Male & Female)
Dated: 23rd October, 2023

To

✓ The Director,
EMIS, E&SE Department

Subject: - TENTATIVE SENIORITY LIST OF MANAGEMENT CADRE OFFICERS
(BS-19) E&SE DEPARTMENT AS STOOD ON 02.10.2023

I am directed to refer to the subject noted above and to enclose herewith tentative joint seniority list of the Management Cadre Officers (BS-19) as stood on 02.10.2023 for uploading on official website of E&SE Department and for information and circulation to all concerned.

All the concerned may go through it and file/submit their objection/ observation (if any) on this tentative seniority list within Fifteen (15) days of its issuance. In case of receipt of no response in the stipulated time it would be presumed that the same is undisputed.

Encl: (As above)

111/1/2023
23.10.2023
(IMRAN ZAMAN)
SECTION OFFICER (Management Cadre)

Copy forwarded for information to the: -

1. Director, E&SE for circulation amongst the concerned officers.
2. All BS-19 Officers of Management Cadre.
3. PS to Minister E&SE Khyber Pakhtunkhwa.
4. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
5. Master file.

111/1/2023
23.10.2023
SECTION OFFICER (Management Cadre)

CTC
2/2023/5

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**TENTATIVE SENIORITY LIST OF MANAGEMENT CADRE OFFICERS (BS-19) E&SE DEPARTMENT AS STOOD ON
02.10.2023**

S. #	Name of Officer with Designation	Date of Birth	Domicile	Date of 1st apptt: in Edu: Deptt:	Date of Apptt./Prom: as D.E.O/Addl. Dir.	Method of recruitment	Remarks
1	Jaffar Mansoor Abbasi, At the Disposal of Directorate	9/15/1968	Abbottabad	2/11/1999	2/24/2011	-do-	No.SO(SM)E&SED/3-2/2011/EDOs/EMC (BS-19) dated 24.02.2011
2	Ms. Samina Altaf, Chairman BISE Kohat	3/12/1965	Haripur	3/25/2000	1/27/2013	-do-	No.SO(S/F)E&SED/3-2/2014/(Female)(BS-19) dated 27.01.2013
3	Abdul Basit, Principal GHSS Agra Payan Charsadda	6/26/1973	Peshawar	1/22/1998	6/26/2012	-do-	No.SO(SM)E&SED/3-2/2012/Recruitment of EDos/Add.Direc (BS-19) dated 26.06.2012
4	Muhammad Uzair Ali DEO Khyber	4/8/1966	Swabi	11/5/1995	2/24/2011	-do-	No.SO(SM)E&SED/3-2/2011/EDOs/EMC (BS-19) dated 24.02.2011
5	Sahibzada Hamid Mahmood, Deputation to ESEF	9/6/1965	Peshawar	12/3/1989	2/24/2011	-do-	No.SO(SM)E&SED/3-2/2011/EDOs/EMC (BS-19) dated 24.02.2011
6	Dilshad Begum D/O Muhammad DEO (F) Abbottabad	1/9/1968	Swat/3	12/1/1988	27.5.2019	By Promotion	Additional Director/ DEO BS-19 vide Notification No.SO(S/F) / E&SED/1-3/ promotion BS-18 to BS-19 MC, dated 27.5.2019 on regular basis.
7	Parveen Begum D/O Gul Daraz Khan DEO (F) Kohistan	1/1/1970	Karak/4	11/14/1990	27.5.2019	By Promotion	Additional Director/ DEO BS-19 vide Notification No.SO(S/F) E&SED/1-3/ promotion BS-18 to BS-19 MC, dated 27.5.2019 on regular basis.
8	Naghmana Sardar D/O Sardar Hussain Khan, Additional Director (F) Directorate of E&SE	9/23/1967	Haripur/5	8/18/2011	27.5.2019	By Promotion	Additional Director/ DEO BS-19 vide Notification No.SO(S/F) E&SED/1-3/ promotion BS-18 to BS-19 MC, dated 27.5.2019 on regular basis.

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S. #	Name of Officer with Designation	Date of Birth	Domicile	Date of 1st apptt: in Edu: Deptt:	Date of Apptt./Prom : as D.E.O/Addl. Dir.	Method of recruitment	Remarks
32	Sajjad Akhtar Iqbal Additional Director (P&D)E&SE.	03/03/1971	Swabi	01/06/1995	12.01.2021	By promotion	Additional Director/ DEO (Male) BS-19 on regular basis vide Notification No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021.
33	Muhammad Sheraz DEO(M) Hangu.	04/01/1975	Karak	22/11/2000	12.01.2021	By promotion	Additional Director/ DEO (Male) BS-19 on regular basis vide Notification No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021.
34	Zahid Muhammad Services placed at the disposal of Directorate E&SE.	14/06/1971	Peshawar	11/05/1996	12.01.2021	By promotion	Additional Director/ DEO (Male) BS-19 on regular basis vide Notification No.SO(SM)E&SED/3-1/2021/Promotion of BS-19 (Management Cadre) dated 12.01.2021.
35	Bibi Razia D/O Gulistan Khan, DEO (F) Kohistan	5/16/1970	Karak	5/18/1988	7/26/2022	By Promotion	Additional Director/ DEO BS-19 vide Notification No. SO(MC) E&SED/1-3/2022/PROMOTION(MC-BS-18) dated 26-07-2022.
36	Rabia Anees D/O Abdul Aziz, Disposal of Directorate	5/12/1976	Peshawar	10/1/2008		By Promotion	Additional Director/ DEO BS-19 vide Notification No. SO(MC) E&SED/1-3/2022/PROMOTION(MC-BS-18) dated 20-04-2022.

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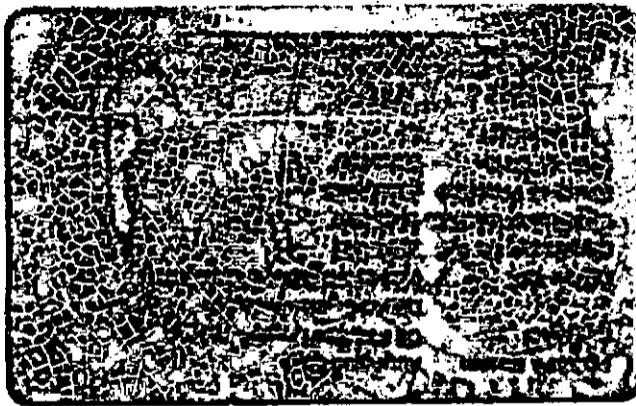
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Section Officer (Management Cadre)
Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar

(ZAHED WAQAR ADVOCATE)



(BC-10-1222)



DBA NO. 170 ABBOTTABAD

BAR COUNCIL
NO. 10-1222 کورٹ فیس

وکالت نامہ

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR
SERVICE APPEAL NO. 2005/2022 بعدالتMr. Muhammad Uzair Ali عنوان: THE Govt. of KPK -
Private Respondent No. 6 منجانب: E-050427

SERVICE APPEAL

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آں مقام

ZAHID WAQAR KHAN ADVOCATE

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہوا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد

استجارت نالاش بصیغہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تاکہ سند رہے۔

المرقوم: 13/12/2023

Peshawar مقام: پشاور

Accepted by me


Zahid Waqar Khan

(ZAHID WAQAR ADVOCATE)

Cost of Rs. 2000/- received in Service Appeal No. 2005/22 in R/A 348/23

Titled M. Uzair vs. Education

in the office of Assistant Registrar, Vide Order 13/12/23, Submitted Dated: 13 / 12 / 2023.


Assistant Registrar
Khyber Pakhtunkhwa
Service Tribunal
Peshawar
13/12/23