

(1)

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

Service Appeal No: 2080/2023

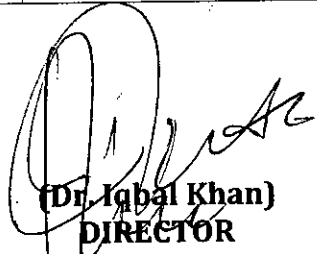
Mufeeda Raheem SST, BPS-17 (P) District Malakand .....Appellant.

VERSUS

Government of Khyber Pakhtunkhwa through Secretary E&SE Department & others.....Respondents

**INDEX SHEET**

S/#	Description of document	Annexure	Pages No.
1	Joint Para Wise Comments along with affidavit		1-4
2	Copy of the Notification dated 25-05-2010.	A	5-8
3	Authority Letter		9

  
**(Dr. Iqbal Khan)**  
**DIRECTOR**  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondent No: 2)

(1) (2)

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

Khyber Pakhtunkhwa  
Service Tribunal

Service Appeal No: 2080/2023

Diary No. 10003

Date 20-12-2023

Mufeeda Raheem SST, BPS-17 (P) District Malakand .....Appellant.

VERSUS

Government of Khyber Pakhtunkhwa through Secretary E&SE Department &  
others.....Respondents

**JOINT PARAWISE COMMENTS ON & FOR BEHALF OF THE RESPONDENTS No. 1-3.**

**Respectfully Sheweth :-**

The Respondents submit as under: -

**PRELIMINARY OBJECTIONS.**

- 1 That the appellant has got no cause of action/locus standi.
- 2 That the appellant is not an aggrieved person within the meaning of Section-4 of Khyber Pakhtunkhwa Service Tribunal Act-1974 read with Article 212 of the constitution of Islamic Republic of Pakistan, 1973
- 3 That the instant Service Appeal is badly time barred.
- 4 That the appellant has concealed material facts from this Honorable Tribunal, hence liable to be dismissed on this score.
- 5 That the appellant has filed the instant appeal on mala-fide motive.
- 6 That the appellant has not come to this Honorable Tribunal with clean hands.
- 7 That the appellant is not entitled for the grant of one pre-mature increment & other consequential benefits w.e.f. 01-10-2007 on the analogy of Judgments dated 03-07-2009 & 04-03-2010.
- 8 That the instant Service Appeal is against the prevailing law & rules, hence, not entitled for promotion in (BPS-18) TC post in the Respondent Department.
- 9 That the instant appeal is based on mala-fide intentions just to put extra pressure on the Respondents for gaining illegal service benefits.
- 10 That this Honorable Tribunal has got no jurisdiction to adjudicate upon the present Service appeal.
- 11 That the appeal is not maintainable in its present form & circumstances of the case as the Departmental Appeal dated 10-07-2023 of the appellant has been seen & filed under the Rules by the Department.

2

12 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.

### ON FACTS

1. That Para-1 relates to the service record of the appellant in the Respondent Department against the SST post regarding her adjustment at GGHS Kharkai Malakand on dated 04-07-2016 by the Department.
2. That Para-2 is pertains to the appointment order dated 12-07-1999 of the appellant against the SET in BPS-16 by the Department.
3. That Para-3 is also incorrect & denied on the grounds that the act of the Department with regard to the up gradation of the appellant in BPS-17 on dated 25-05-2010 instead of 01-10-2007 is within legal parameter *attached as Annex-A*.
4. That Para-4 is incorrect to the extent of not entitlement of the appellant of pre mature increment & her promotion in BPS-18 regular on the grounds that upgradation in upper scale is always for the financial benefits of the appellant & does not accrued any legal right for promotion against a regular post in BPS-18 under the Rules in the Department.
5. That Para-5 is also incorrect & denied on the grounds that the plea of the appellant is against the Rules & policy in vogue, hence, the Departmental appeal of the appellant dated 10-07-2023 for the grant of pre mature increment & for promotion to the post of BPS-18 TC H/SS has been seen & filed by the Department on the legal ground of regular promotion to the post of BPS-17 in the Department which is yet to be availed by the appellant in terms of his seniority cum fitness bases against his current post of SST.
6. That para-6 is incorrect as the appellant is not an aggrieved person within the meaning of Section-4 of Khyber Pakhtunkhwa Service Tribunal Act-1974 read with Article 212 of the constitution of Islamic Republic of Pakistan, 1973, hence, the appeal in hand is liable to be rejected on the following grounds inter alia: -

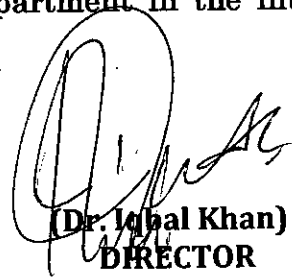
### ON GROUNDS

- A. Incorrect & denied. The appellant has been treated as per Law & Rules by the Department in the titled appeal & has been found in eligible for the grant of pre mature increment w.e.f. 01-10-2007 & promotion in BPS-18 TC under the Rules .
- B. Incorrect & denied. The appellant has been treated as per law & rules by the competent authority. Therefore, the stand of the appellant is baseless & Liable to be rejected.
- C. Incorrect & denied. The appellant is not a similarly placed person as he has been treated as per law & rules by the competent authority. Therefore, the stand of the appellant is baseless & Liable to be rejected.
- D. Incorrect & denied. The cited Judgment 2005 SCMR P-499 is not applicable upon the case of the appellant in the current circumstances of the titled case.

- E. Incorrect & denied. The appellant is not a similarly placed person as he has been treated as per law & rules by the competent authority. Therefore, the stand of the appellant is baseless & Liabile to be rejected, hence, the provision of Rule-9-A of pay revision Rule-1908 is not applicable upon the case of the appellant.
- F. Incorrect & denied. The appellant has got no cause of action to approach this Honorable Tribunal in the titled appeal.
- G. Incorrect & denied. The appellant has been treated as per law & rules by the competent authority. Therefore, the stand of the appellant is baseless & Liabile to be rejected under the provision of Article-4 of the constitutional of 1973.
- H. Incorrect & denied. The appellant has been treated as per law & rules by the competent authority. Therefore, the stand of the appellant is baseless & Liabile to be rejected under the provision of Articles-25 & 27 of the constitutional of 1973. However, the Respondents also seek leave of this Honorable Tribunal to submit additional grounds, case law & record at the time of arguments on the date fixed before this Honorable Bench.

In view of the above made submissions, it is humbly prayed that this Honorable Tribunal may very graciously be pleased to dismiss the instant appeal with cost in favor of the respondent Department in the interest of justice.

Dated \_\_\_/\_\_\_/2023



**(Dr. Iqbal Khan)**  
**DIRECTOR**  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondent No: 2)



**(Motasim Billah Shah)**  
**SECRETARY**  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondents No: 1 & 2)

(4)

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

Service Appeal No: 2080/2023

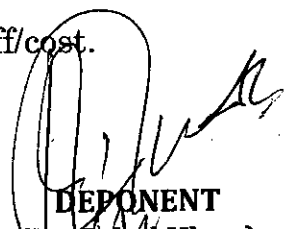
Mufeeda Raheem SST, BPS-17 (P) District Malakand .....Appellant.

VERSUS

Government of Khyber Pakhtunkhwa through Secretary E&SE Department & others.....Respondents

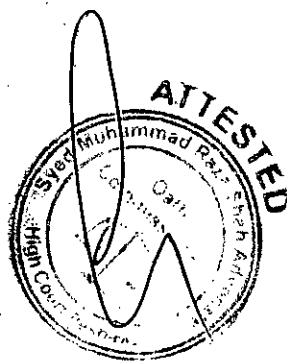
**AFFIDAVIT**

I, Dr. Iqbal Khan Director E&SE Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant para wise Comments are true & correct to the best of my knowledge & belief. It is further stated on oath that in this appeal the answering Respondents have neither been placed Ex-Parte nor their defense has been struck off/cost.

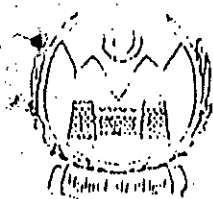


**DEPONENT**  
**(Dr. Iqbal Khan)**  
**DIRECTOR**

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.



20 DEC 2023



S-~~11~~ 1106  
ADVOCATE  
I. SUPREME COURT

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

Dated Peshawar 25-05-2010

NOTIFICATION

NO.50(PF)2-G/E&SED/DPCMTG/UPGRADATION/10: The Competent Authority on the recommendation of the Departmental Promotion Committee and in consultation with Finance department is pleased to allow up gradation from BS-16 to BS-17 (Personal) to the following 1013 Male SETs, 347 Female SETs and 1 Male SFT (Tech) with immediate effect subject to the condition that the post of SET shall be downgraded from BS-17 to BS-16 as and when vacated by the incumbents:

**1013 MALE SET (GEN)**

S.No	Serially List No.	Name of Officer	Date of Appointment as Regular SET	Present Place of Posting
1.	1286(A)	Nazir ud din	12-6-88	SET GHSS Shamoza Swat
2.	1756	Muhammad Khalid	09-10-88	SET GHS Khollan bala Haripur
3.	1904(A)	Muhammad Naqom Shah	7-4-88	SET GHS Naryab Hango
4.	2279 A	Syed Jamil Ahmad Shah	11-1-91	SET GHS Ghara Bazran A.Abad
5.	2330-b	Muhammad Zaman	27-07-91	SET GHS Khragi FR-Tank
6.	2337(D)	Malik Jan	11-3-91	SET GHS Dara Adam khol FR Kohat
7.	2337(D)	Muhammad Riaz	15-04-93	SET GHSS Jamrud
8.	2337(C-7)	Ahmad Khan	29-04-93	SET GMHS Sadda Kurram Agy
9.	2337(JB)	Qhulam Habib	20-04-93	SET GHS Ashkar Kol SWA
10.	2337(AG)	Taj Muhammad Khan	6-1-94	SET GHSS Kot Najeeb ullah Haripur
11.	2628	Muhammad Ferooz Khan	10-11-94	ADO (AEO) Fala
12.	2700(10)	Fazl Muhammad	21-05-95	SET GHSS Tornaali Charsadda
13.	2717	Mr. Fazli Khaliq	23-5-95	SET GHS Mullazai Tank
14.	3409-a	Akhar Ali	10-02-96	SET GHS Hsara Bara Khyber Agency
15.	3489-b	Kamil Khan	10-02-95	SET GHS Sani khel, FR Kohat
16.	3530	Mulazim Hussain	25-3-96	GHS No.2 Paharpur DIK.
17.	3714	Mr.Rafiq ul Ahmad	25-3-96	SET GCMS Chitral
18.	4025(1)	Noorullah Jan	6-5-96	SET GHS Shagai, Khyber
19.	4025(19)	Sultan Farooq	8-5-96	SET GEC Mir Ali NWA
20.	4025(20)	Saad Ullah Khan	18-11-97	SET GMS Palangzai NWA
21.	4027	Mr. Zia Ahmed	15-1-97	SET GHS Dheri khattak khol NSR
22.	4030	Mr. Abdullah	15-1-97	GHS Batakara Swabi
23.	4032	Mr. Masoodur Rehman	15-1-98	SETGHS Kanigoram SWA
24.	4033	Mr. Mazhar Munir	15-1-98	GHSS No.4 DIKhan
25.	4034	Mr.Mutahir shah	15-1-98	SET GHS Tor Landi Swabi
26.	4035	Mr.Munawwar Hussain	15-1-98	SET GHSS Abu khol Lakki
27.	4036	Mr. Shamsur Rehman	15-1-98	SET GHS No.3 Kohat
28.	4037	Mr. Gulzar Khan	15-1-98	SET GHS Mail Khol Bala Nowshera
29.	4038	Mr. Jehangir Khan	15-1-98	SET GHS No.1 Charsadda
30.	4039	Mr. Ali Akbar	15-1-98	SET GCMH Battagram

Attested  
P

DIRECTOR  
Khyber Pakhtunkhwa  
Education Agency

BETTER COPY

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar 25.05.2010

NOTIFICATION.

NO.SO(PF)2-6/E&SED/DPCMTG/UPGRADATION/10: The Competent Authority on the recommendation of the Departmental Promotion Committee and in consultation with the Finance Department is pleased to allow up gradation from BS-16 to BS-17 (Personal) to the following 1013 Male SETs, 347 Female SETs and 1 Male SET (Tech) with immediate effect subject to the condition that the post of SET shall be downgraded from BS-17 to BS-16 as and when vacated by the incumbents:

**1013 MALE SET (GEN)**

S. No	Seniority List No.	Name of Officer	Date of appointment as regular SET	Present Place of Posting
1	1286(A)	Nazir ud Din	12.6.88	SET GHSS Shamoza Swat
2	1256	Muhammad Khalid	09.10.89	SET GHS Kholan Bala Haripur
3	1964(A)	Muhammad Naeem Shah	7.4.98	SET GHS Naryab Hango
4	2274A	Syed Jamil Ahmad Shah	11.1.91	SET GHS Ghera Bazran A.Abad
5	2330-b	Muhammad Zaman	27-07-91	SET GHS Khragi FR-Tank
6	2337(B)	Malik Jan	11.8.91	SET GHS Dara Adam Khel FR Kohat
7	2337(D)	Muhammad Riaz	15-04-93	SET GHSS Jamrud
8	2337(37)	Ahmad Khan	29-04-88	SET GMHS Sadda Khurram Agy
9	2337(38)	Ghulam Habib	20-04-88	SET GHS Ashkar Kot SWA
10	2337(39)	Taj Muhammad Khan	5-3-98	SET GHSS Kot Najeeb Ullah Haripur
11	2628	Muhammad Farooq Khan	10-11-94	ADO (ADEO) Fata
12	2708(10)	Faqir Muhammad	21-05-98	SET GHSS Tarnab Charsadda
13	2717	Mr. Fazle Khaliq	23-5-95	SET GHS Mullazai Tank
14	3489-a	Akbar Ali	10-2-96	SET GHS Hisara Bara Khyber Agency
15	3489-b	Kamil Khna	10-2-96	SET GHS Sani Khel, FR Kohat
16	3530	Mulazim Hussain	25-3-96	GHS No 2 Paharpur DIK
17	3714	Mr. Rafiq ul Ahmad	25-3-96	SET GCMS Chitral
18	4025(1)	Noorullah Jan	6-5-96	SET GHS Shagai, Khyber
19	4025(19)	Sultan Farooq	8-3-97	SET GEC Mir Ali NWA
20	4025(20)	Saad Ullah Khan	18-11-97	SET GMS Palangzai NWA
21	4027	Mr. Zia Ahmad	15-1-98	SET GHS Dheri Khattak Khel NSR
22	4030	Mr. Abdullah	15-1-98	GHS Batakara Swabi
23	4032	Mr. Masood ur Rehman	15-1-98	SETGHS Kanigoram SWA
24	4033	Mr. Mazhar Munir	15-1-98	GHSS No.4 DI Khan
25	4034	Mr. Mutahir Shah	15-1-98	SET GHS Tor Landi Swabi
26	4036	Mr. Munawwar Hussain	15-1-98	SET GHSS Abu Khel Lakki
27	4038	Mr. Shamsur Rehman	15-1-98	SET GHS No.3 Kohat
28	4042	Mr. Gulzar Khan	15-1-98	SET GHS Mall Khel Bala Nowshera
29	4043	Mr. Jehangir Khan	15-1-98	SET GHS No.1 Charsadda
30	4044	Mr. Ali Akbar	15-1-98	SET CCMH Battagram

Attested  
P

Attested  
D

Attested  
D  
10/05/10

6

266.	1629	Norcen Naheed,	12.7.99	SET GGHS, Kala-killi Swat
267.	1632	Akhla Jiboun,	12.7.99	SET GGHS, Topi Swabi
268.	1635	Abida,	12.7.99	SET GGHS, Hisar buner
269.	1636	Shahcon Naz	12.7.99	SET GGMS, Chami Kor M. Agcy
270.	1637	Jamila Begum,	12.7.99	SET GCMS, Ghajji- Kandar khel Pesh
271.	1639	Mussarat Bequm,	12.7.99	SET GGHS, Saidu Sharif Swat
272.	1644	Nazli Inayat	12.7.99	SET GGMS Baz Muhammad kor. Moh. Agy
273.	1645	Zulfaikha Bibi	12.7.99	SET GGMS, Hayal Khan korona khirgi FR Tank
274.	1646	Baseerat Naz	12.7.99	SET GGHS Shankar Mahal Mardan
275.	1650	Fauzla Begum	12.7.99	SET GGMS Maho Dheri Mardan
276.	1653	Ihsania Shauib	12.7.99	SET GGHS Gumbad Mardan
277.	1654	Naheed Mubarik	21-9-99	SET GGHS Pind kamal khan Haripur
278.	1656	Bibi Sajida	12.7.99	SET GGMS, Gul bahar No.4 Pesh
279.	1659	Saryaz Begum	12.7.99	SET GGMS Thar L. Dir.
280.	1660	Ghazala Shaheen	21-9-99	SET GGHS NO.2 Mansara
281.	1661	Robina safi	12.7.99	SET GGHS Laraqa Pesh.
282.	1663	Elizbith Begum	12.7.99	SET GGMS Goligram Swat
283.	1664	Hamida Begum,	12.7.99	SET GGMS Qambar Swat
284.	1666 (A)	Rchana Raza	18-3-99	SET GGHS No.2 NSR Kalan
285.	1672	Rehana sarwat	12.7.99	SET GGHS Turangzal Charsadda
286.	1676	Naheeda,	12.7.99	SET GGHS Islamja Collegiate Pesh
287.	1677	Tahira Batool	12.7.99	SET GGHS, Badhber Pesh
288.	1678	Basmeen	12.7.99	SET GGHS, Kala Khan Swabi
289.	1679	Farzana Shaheen	12.7.99	SET GGHS, Gudwalia Haripur
290.	1681	Naheed Begum,	12.7.99	SET ADO (F) Taimar Gara Dir. (L)
291.	1686	Ghazala Yasmin	12.7.99	SET GGHS, Skhakot Malakand
292.	1687	Bakhil Bahar,	12.7.99	SET GGHS, Madain Swat
293.	1688	Farida Shahzad	12.7.99	SET GGHS, Gujar Ghari Mardan
294.	1691	Robina Gulzar	12.7.99	SET GGHS, Topi Swabi
295.	1691	Robina Ilyas,	12.7.99	SET GGHS, Topi Swabi
296.	1692	Farah Naz,	12.7.99	SET GGHS, Khairabad Nowshera
297.	1693	Gul Naz Bibi	12.7.99	SET GGHS No.2 AJAbad
298.	1696	Shazia Anjum	12.7.99	SET GGHS, Sector No.3 TTS Haripur
299.	1697	Bibi Sadia	12.7.99	SET GGHS Bara Lino Pesh
300.	1698	Shahveen	12.7.99	SET GGHS, Abooha Swat
301.	1699	Rashida	12.7.99	SET GGHS, Hathjan Mardan
302.	1702	Saira Uano	12.7.99	SET GGHS, Shawa Swabi
303.	1703	Sadaqat Begum,	12.7.99	SET GGHS No.1 Saidi Sharif Swat
304.	1706	Munlikul Muniaz,	12.7.99	SET GGHS, Qasmi Mardan
305.	1707	Shahi Zoanat,	12.7.99	SET GGHS, Nisala CHD
306.	1708	Mufeeda Rahim,	12.7.99	SET ADO (F) Swat
307.	1712	Nusrat Jabeen,	12.7.99	SET GCMS, Sorona, Malakand
308.	1713	Shahnaz Begum,	12.7.99	SET GCMS, Nahaqi CHD
309.	1715	Shad Bibi,	12.7.99	SET GGHS, Mingora Swat
310.	1717	Bibi Ruqia	12.7.99	SET GGHS, Khwaza Khola Swat
311.	1721	Shahida Taskeen,	12.7.99	SET GGHS, Behrain Swat
312.	1723	Toshiba Naz,	21-9-99	SET GHS, Khawari Mansehra
313.	1724	Nargis,	21-9-99	SET GGHS, Phoolra Mansehra
314.	1726	Shabnam Sidiq,	12.7.99	SET GGHS Manga Mardan
315.	1727	Ghazala Norcen,	12.7.99	SET GGHS, No.1 Mingora Swat
			12.7.99	SET GGHS, Maneri Swabi

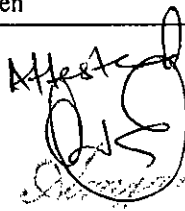
Attested  
P

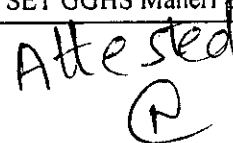
HEAD MASTER  
G.H.S. D. M. Bala  
Mardan, Swat



BETTER COPY

266	1629	Noreen Naheed	12.7.99	SET GGHS Kala Killi Swat
267	1632	Akhtar Jabeen	12.7.99	SET GGHSS, Topi Swabi
268	1635	Abida	12.7.99	SET GGHS Hisar Buner
269	1636	Shaheen Naz	12.7.99	SET GGMS, Chami Kor M.Agy
270	1637	Jamila Begum	12.7.99	SET GCMS, Ghajli Kandar Khel Pesh
271	1639	Musarrat Begum	12.7.99	SET GGHS Saidu Sharif Swat
272	1644	Nazli Inayat	12.7.99	SET GGMS Baz Mohammad Kor Moh.Agy
273	1645	Zulaikha Bibi	12.7.99	SET GGMS, Hayat Khan Korona Khirgi FR Tank
274	1646	Baseerat Naz	12.7.99	SET GGHS Shankar Mahal Mardan
275	1650	Fauzia Begum	12.7.99	SET GGMS Maho Dheri Mardan
276	1653	Ihsania Shauib	12.7.99	SET GGHS Gumbad Mardan
277	1654	Naheed Mubarik	12.7.99	SET GGHS Pind Kamal Khan Haripur
278	1656	Bibi Sajida	12.7.99	SET GGMS Gul Bahar No 4 Pesh
279	1659	Saryaz Begum	12.7.99	SET GGMS Thar L.Dir
280	1660	Ghazala Shaheen	21-9-99	SET GGMS No 2 Mansara
281	1661	Robina Safi	12.7.99	SET GGHS Larama Pesh.
282	1663	Elizbith Begum	12.7.99	SET GGMS Goligram Swat
283	1664	Hamida Begum	12.7.99	SET GGMS Qambar Swat
284	1666(A)	Rehana Raza	19-3-96	SET GGHS No.2 NSR Kalan
285	1672	Rehana Sarwat	12.7.99	SET GGHS Turangzai Charsadda
286	1676	Naheeda	12.7.99	SET GGHS. Islamia Collegiate Pesh
287	1677	Tahira Batool	12.7.99	SET GGHS, Badhber Pesh
288	1678	Basmeen	12.7.99	SET GGHSS Kalu Khan Swabi
289	1679	Farzana Shaheen	12.7.99	SET GGHS Gudwalia Haripur
290	1681	Naheed Begum	12.7.99	SET ADO(F) Taimar Gara Dir(L)
291	1686	Ghazala Yasmin	12.7.99	SET GGHS, Skhakot Malakand
292	1687	Bakhti Bahar	12.7.99	SET GGHS Madain Swat
293	1688	Farida Shahzad	12.7.99	SET GGHS Gujar Garhi Mardan
294	1689	Robina Gulzar	21-9-99	SET GGHS Bagnotar A/Ahad
295	1691	Rahat Ilyas	12.7.99	SET GGHS Khairabad Nowshera
296	1692	Farah Naz	21-9-99	SET GCHS No 2 A/Abad
297	1693	Gul Naz Bibi	12.7.99	SET GGHS Sector No 3 KTS Haripur
298	1696	Shazia Anjum	12.7.99	SET GGHS Bara Line Pesh
299	1697	Bibi Sadia	12.7.99	SET GGHS Abooha Swat
300	1698	Shaheen	12.7.99	SET GGHSS Hathian Swat
301	1699	Rashida	12.7.99	SET GGHSS Shawa Swabi
302	1702	Saira Bano	12.7.99	SET GGHS No 1 Saidu Sharif Swat
303	1703	Sadaqat Begum	12.7.99	SET GGHS Qasmi Mardan
304	1706	Mumlikat Mumtaz	12.7.99	SET GCHS Nisata CHD
305	1707	Shahi Zeenat	12.7.99	SET ADO(F) Swat
306	1708	Mufeeda Rahim	12.7.99	SET GCMS, Sorona Malakand
307	1712	Nusrat Jabeen	12.7.99	SET GCMS, Nahaqi CHD
308	1713	Shahnaz Begum	12.7.99	SET GGHS, Mingora Swat
309	1715	Shad Bibi	12.7.99	SET GGHS Khwaza Khela Swat
310	1717	Bibi Ruqia	12.7.99	SET GGHS Behrain Swat
311	1721	Shahida Taskeen	21-9-99	SET GHS Khawari Manshera
312	1723	Toshiba Naz	21-9-99	SET GGHS, Phoolra Mashera
313	1724	Nargis	12.7.99	SET GGHS Manga Mardan
314	1726	Shabnam Sadiq	12.7.99	SET GGHS No 1 Mingora Swat
315	1727	Ghazala Noreen	12.7.99	SET GGHS Maneri Swabi

Attested  


Attested  


SECRETARY  
SWAT

316	1731	Azra Yasmin	12.7.99	SLI GGMS, Peshawar Puyun Posh
317	1732	Riyazul	12.7.99	SET GGHS, Paur Swat
318	1733	Humaira Naz	12.7.99	SET GGMS, Zamanul Iqbal ahud Malakand
319	1734	Ghazala Shalinam	12.7.99	SET GGHS, Lund khwar, Mardan
320	1735	Ruqia	12.7.99	SET GGHS, Tour dhor, Swabi
321	1737	Sajida Nuzhat	12.7.99	SET GGHS, Mingora Swat
322	1738	Nizakat Amber	12.7.99	SET ADO Swat
323	1740	Falak Naz	12.7.99	SET GGHS, Shohbaz Ghari Mardan
324	1741	Salma Begum	12.7.99	SET GGHS, Shaheen Camp Peshawar
325	1742	Nighat Seema	12.7.99	SET GHS, Fata Directorate
326	1743	Hayat Begum	12.7.99	SET GGHS, Odigram swat
327	1744	Naila Perveen	12.7.99	SET GGHS, Malia Swat
328	1745	Shakila Naz	13.7.99	SET GGHS Sakhakot Malakand
329	1746	Almas Begum	12.7.99	SET GGHS, Charbagh Swat
330	1748	Naila Perveen	12.7.99	SET GGHS, Bara Durash Khol Swat
331	1749	Razia Taj	12.7.99	SET GGHS, Halhian Mardan
332	1751	Yasmin Bibi	12.7.99	SET GGHS, Miana Malakand
333	1753	Nasim Akhtar	12.7.99	SET GGMS, Surok Toor Chappar Fata
334	1754	Samina Yousaf	12.7.99	SET GGHS, Suban Khawar Mohd Agcy
335	1755	Gul Pari	12.7.99	SET GGMS, Wall Khol, Fata
336	1757	Nabila Naz	12.7.99	SET GGHS, Kerigar, ghari Kh. Agcy
337	1758	Lubna Begum	12.7.99	SET GGMS, Haryana Bala Pesh
338	1760	Syeda Rozina Kauser	12.7.99	SET GGHS Landi Arbab Posh
339	1765	Amina Wazeer	12.7.99	SET GGMS, Jamu shahi Khol FR Kohat
340	1767	Khalida Jan	12.7.99	SET AAEO, Mohd Agency
341	1772	Wahida Khan	12.7.99	SET AAEO, Khyber Jamrud
342	1774	Zahida Huda	12.7.99	SET GGMS, Kothi Uubara FR DIK
343	1776	Anila Zaheer	12.7.99	SET GGMS SRD M. Agcy
344	1780	Noor Rabia	12.7.99	SET GGHS, Subhan Khwar Mohd. Agcy
345	1781	Fardat Amir	12.7.99	SET GGMS, Baz Mohd kor M. Agcy
346	1782(A)	Nosheeqa Aziz	12.7.99	SET GGHS, Chamkani Pesh
347	1782(B)	Nur Jabeen	12.7.99	SET GGMS Sragala Kurram Agency FATA

**1 MALE SET (TECH)**

S.No	Seniority List No.	Name of Officer	Date of Appointment as Regular SET	Present Place of Posting
1	115 C	Mumtaz Khan	17-12-92	SET (TECH) GHS. Latamber Karak

SECRETARY TO GOVT OF KHYBER  
PAKHTUNKHWA  
ELEMENTARY & SECONDARY  
EDUCATION DEPARTMENT

*Attested*  
*(P)*

Endst; of even no. & date:

Copy is forwarded to:-

- 1) Secretary to Govt of Khyber Pakhtunkhwa, Establishment Department, Peshawar.
- 2) Special Secretary (Regulation), Establishment Department, Govt of Khyber Pakhtunkhwa Peshawar.
- 3) Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department, Peshawar.
- 4) Secretary to Chief Minister Khyber Pakhtunkhwa.
- 5) PS to Chief Secretary Khyber Pakhtunkhwa.

*Attested*  
*(Signature)*

SECRETARY

**BETTER COPY**

316	1731	Azra Yasmin	12.7.99	SET GGMS Pishtakhara Payan Pesh
317	1732	Riyasat	12.7.99	SET GGHS Panr Swat
318	1733	Humaira Naz	12.7.99	SET GGMS Zoomandl horo shah Malakand
319	1734	Ghazala Shabnam	12.7.99	SET GGHS Lund Khwar Mardan
320	1735	Ruqia	12.7.99	SET GGHS Tour dher Swabi
321	1737	Sajida Nuzhat	12.7.99	SET GGHS Mingora Swat
322	1738	Nizakat Ambar	12.7.99	SET ADO Swat
323	1740	Falak Naz	12.7.99	SET GGHSS Shahbaz Garhi Mardan
324	1741	Salma Begum	12.7.99	SET GGHS Shaheen Camp Peshawar
325	1742	Nighat Seema	12.7.99	SET GHS Fata Directorate
326	1743	Hayat Begum	12.7.99	SET GGHSS Odigram Swat
327	1744	Naila Parveen	12.7.99	SET GGHSS Matta Swat
328	1745	Shakila Naz	12.7.99	SET GGHSS Skhakot Malakand
329	1746	Almas Begum	12.7.99	SET GGHS, Charbagh Swat
330	1748	Naila Parveen	12.7.99	SET GGHS Bara Durash Khel Swat
331	1749	Razia Taj	12.7.99	SET GGHSS Hathian Mardan
332	1751	Yasmin Bibi	12.7.99	SET GGHS Miana Malakand
333	1753	Nasim Akhtar	12.7.99	SET GGMS Surook Tor Chappar Fata
334	1754	Samina Yousaf	12.7.99	SET GGHS Suban Khawar Moh: Agy
335	1755	Gul Pari	12.7.99	SET GGMS Wali Khel Fata
336	1757	Nabila Naz	12.7.99	SET GGHSS Karigar ghari Kh. Agy
337	1758	Lubna Begum	12.7.99	SET GGMS Haryana Bala Pesh
338	1760	Syeda Rozina Kauser	12.7.99	SET GGHS Landi Arbab Pesh
339	1765	Amina Wazeer	12.7.99	SET GGMS Jamu Shahi Khel FR Kohat
340	1767	Khalida Jan	12.7.99	SET AAEO Mohd Agency
341	1772	Wahida Khan	12.7.99	SET AAEO Khyber Jamrud
342	1774	Zahida Bibi	12.7.99	SET GGMS Kohi Babara FR DIK
343	1776	Anila Zaheer	12.7.99	SET GGMS SRD M. Agy
344	1780	Noor Rabia	12.7.99	SET GGHS Subhan Khawar Moh. Agy
345	1781	Farhat Amir	12.7.99	SET GGMS Baz Mohd Kor M. Agy
346	1782(A)	Nosheena Aziz	12.7.99	SET GGHSS Chamkani Pesh
347	1782(B)	Nur Jabeen	12.7.99	SET GGMS Sragala Kurram Agency FATA

**1 MALE SET (TECH)**

S. No	Seniority List No.	Name of Officer	Date of appointment as regular SET	Present Place of Posting
1	115 C	Mumtaz Khan	17-12-02	SET (TECH) GHS Latamber Karak

*Attested*  
*(Signature)*

**(SECRETARY TO GOVT OF KHYBER  
PAKHTUNKHWA  
ELEMENTARY & SECONDARY  
EDUCATION DEPARTMENT**

Endst: of even no & date

Copy is forwarded to:

- 1) Secretary to Govt of Khyber Pakhtunkhwa, Establishment Department, Peshawar
- 2) Special Secretary (Regulation), Establishment Department, Govt of Khyber Pakhtunkhwa Peshawar
- 3) Secretary to Govt of Khyber Pakhtunkhwa, Finance Department, Peshawar
- 4) Secretary to Chief Minister Peshawar
- 5) PS to Chief Secretary Khyber Pakhtunkhwa

*Attested*  
*(Signature)*  
ADVOCATE  
SUPREMACY

- 6) All Directors in Elementary & Secondary Education Department Khyber Pakhtunkhwa.
- 7) Executive District Officers, Elementary & Secondary Education concerned.
- 8) The Accountant General Khyber Pakhtunkhwa.
- 9) All District Accounts Officers / Agency Accounts Officers concerned
- 10) PS to Minister for Elementary & Secondary Department Khyber Pakhtunkhwa.
- 11) PS to Secretary / Special Secretary / Additional Secretary E&S Edu: Deptt Govt of Khyber Pakhtunkhwa.
- 12) PA to Deputy Secretary (Admn) Elementary & Secondary Edu: Department Govt of Khyber Pakhtunkhwa.
- 13) Officers concerned
- 14) Master file

*[Handwritten Signature]*

(ARIF JAMIL)  
SECTION OFFICER (PRIMARY)

Attested  
*[Handwritten Signature]*

*[Handwritten Signature]*  
*[Handwritten Signature]*

MASTER  
Gura Bala  
M.R.O. Agency.

Attested  
*[Handwritten Signature]*

*[Handwritten Signature]*  
ADVOCATE  
SUPREME COURT

**BETTER COPY**

- 6) All Directors in Elementary & Secondary Education Department Khyber Pakhtunkhwa
- 7) Executive District Officers Elementary & Secondary Education concerned
- 8) The Accountant General Khyber Pakhtunkhwa
- 9) All District Accounts Officers/Agency Accounts Officers concerned
- 10) PS to Minister for Elementary & Secondary Education Department Khyber Pakhtunkhwa
- 11) PS to Secretary/Special Secretary/Additional Secretary E&SE Education Deptt Govt of Khyber Pakhtunkhwa
- 12) PA to Deputy Secretary (Admn) Elementary & Secondary Edu; Department Govt of Khyber Pakhtunkhwa
- 13) Officers concerned
- 14) Master file

(ARIF JAMIL)  
SECTION OFFICER (PRIMARY)

Attested  
P

Attested  
ADVOCATE  
SUPREME COURT



**DIRECTORATE ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA, PESHAWAR.**

---

**AUTHORITY LETTER**

I, Dr. Iqbal Khan, Director (E&SE) Khyber Pakhtunkhwa Peshawar do hereby authorized Mr. Behramand Khan, Assistant Director Litigation-II of this Directorate for submission of Joint Parawise Comments in **Service Appeal No. 2080/2023 case titled Mufeeda Raheem SST (BPS-17) (P) District Malakand Vs Government of Khyber Pakhtunkhwa & others** fixed for hearing on 05-12-2023, hence, an authority letter is hereby issued in favor of the above-named officer.

**(Dr. Iqbal Khan)**  
**DIRECTOR**  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar