#### BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR.

S-APPEAL No 4834/2021.

Muhammad Shoaib Anwar, C.T(BPS-15), GMS Chanda Manzai, District Karak. (APPELLANT)

### **VERSUS**

Govt of Khyber Pakhtunkhwa through Secretary, (E & SE) Department, Peshawar & Others. (RESPONDENTS)

# **REPLY INDEX**

S.NO	Document	Annexure	Page
1	REPLY of respondent No's 12 & 14		1-2
2	Affidavit		3
3	Notification No: 1610-17 dated: 19-03-2018		4-5
4	Wakalat Nama		

Date: 12-11-2021

Respondents

1. Muhammad Naseem Ullah

2. Nawab Ali khan

**Through** 

Abdul Nasir Khattak Advocate

Karak

Cell: 0346-9777867

### BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR.

S-APPEAL No. 4834 /2021.

Muhammad Shoaib Anwar, C.T(BPS-15), GMS Chanda Manzai, District Karak. (APPELLANT)

#### **VERSUS**

Govt of Khyber Pakhtunkhwa through Secretary, (E & SE) Department, Peshawar & Others. (RESPONDENTS)

## REPLY

Reply on behalf of Private Respondent No 12 Muhammad Naseem Ullah and Respondent No 14 Nawab Ali Khan.

# Respectfully Sheweth,

Joint reply on behalf of Respondent No's 12 & 14 is submitted as under.

### **Preliminary and Legal Objections**

- **1.** The appellant has got no cause of action to file the instant appeal against the respondents.
- 2. The appellant has got no locus standi.
- **3.** The appellant has suppressed (concealed) important documentary/legal and material facts from this Hon'able Tribunal.
- 4. The appellant has not come to the Hon'ble Tribunal with clean hands.
- 5. The appeal is not maintainable and entertain able as per law and statutes.
- **6.** The appeal is bad for non joinder of necessary parties and mis-joinder of unnecessary parties.
- 7. The appeal is liable to be dismissed in limine.

#### **FACTUAL**

- 1. Para No 1 of the appeal is pertaining to office record. However it is admitted fact that present appellant was appointed on adhoc and contract bases as evident by annexure A of the appeal (appointment order of the appellant).
- 2. Para No 2 of the appeal needs interpretations and explanation. Actually annexure B of the appeal page No 7 clause No 7 is quite clear about the matter in question. (copy of notification dated 19-03-2018 is annexed as A)
- 3. Para No 3 of the appeal is replied with the comments that the appellant has never impugned or disputed the relevant seniority list before any forum till date. Nor has challenged the same in the instant appeal, which is necessary for fair and proper adjudication (settlement) of the matter before this Hon'ble Tribunal.
- 4. Para No 4 of the appeal is relating to the record of official respondents, however it is pertinent to mention here that due to covid-19 pandemic (corona), last date of meeting of Departmental Selection Committee (D.P.C) was extended to 19-10-2020. It will be proper and adequate to mention here that the date of D.P.C meeting was extended in the entire province and it was not extended only for District Karak. Moreover it is further added that respondent No 2 being competent authority is fully empowered and has

jurisdiction to postponed/change meeting of the D.P.C and grant suitable extension in connection with D.P.C meeting.

- 5. Para No 5 of the appeal has already been replied and explained in the ibid Para no 4. Hence no need of further explanation.
- 6. Para No 6 of the appeal is incorrect, the official respondent have adopted (followed) all required codel formalities before issuing the promotion order in question. Moreover the official respondents had strictly followed rules and regulations. It is further added that the answering respondent has no relation with the official work and arrangements of the respondents No 1, 2 and 3.
- 7. Para No 7 of the appeal is not relating to the answering respondents and it deals with the official respondent, hence needs no comments.
- 8. Para No 8 of the appeal being legal and not directly deal with the answering respondent, hence no need of reply.

#### **GROUNDS:**

- A. Grounds A directly deal with the official respondent No 1---3, hence no comments.
- B. Legal and pertaining to law & statute, however the answering respondents have no blood relation to official respondents No 1---3.
- C. Ground C is relating to the jurisdiction of official respondents, hence needs no comments.
- D. Ground D is not relevant to the answering respondent. Hence no comments.
- E. Ground E is pertaining to law, rules, statue, policy and notification of the department, hence needs no comments.
- F. Ground F is not relating to the answering respondents, hence needs no comments.
- G. Ground G deal with the jurisdiction and authority of official respondents, so needs no comments.
- H. Ground H being legal and deal with the jurisdiction of this Hon'ble Tribunal. So the answering respondent feels no need of comments.

It is, therefore, very humbly prayed that in view of the reply submitted by the respondents, service appeal of the appellant, may very kindly be dismissed with special cost.

Date: 12.../2021

#### RESPONDENTS

1. Respondent No 12 Muhammad Na

2. Respondent No 14 Nawab Ali Khai

Throug Abdul Nasir Khattak Advocate, Karak.

Cell No: 0346-9777867

# BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR.

S-APPEAL No 4834/2021.

Muhammad Shoaib Anwar, C.T(BPS-15), GMS Chanda Manzai, District Karak. (APPELLANT)

#### **VERSUS**

Govt of Khyber Pakhtunkhwa through Secretary, (E & SE) Department, Peshawar & Others. (RESPONDENTS)

## **AFFIDAVIT**

We No: 1. Muhammad Naseem Ullah No: 2 Nawab Ali khan Respondent No's 12 & 14 do solemnly affirm and declare that all the contents of the written reply are true and correct to the best of our knowledge and belief, nothing has been concealed from this Hon'ble court and nothing is lie.

Date: 1.2./11/2021

**Deponents** 

1. Muhammad Naseem Ullah

2. Nawab Ali khan

Identified by Abdul Nasir khattak

Advocate, karak.

Cell: 0346-9777867

Kingtwee (D)

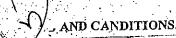
Τr

# OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KARAK.

#### NOTIFICATION.

Under the provision of the Khyber Pakhtunkhawa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act 2018 (Khyber Pakhtunkhawa Act No.I of 2018), In pursuance the Govt: of Khyber Pakhtunkhawa Notification No. SO (S/F)E & S ED / 3-2/2018/SITT/Contract, dated 16.2.2018, Services of the following CT appointed on adhoc basis on contract, are hereby regularized in BPS 15 on the same post in Teaching cadre on the terms and condition given below with effect from the date of their appointment on the C.T Post:

No   Year   Name   Father Name   Domicile   Date of Birth   CNIC No   200   School where posted   Date   Date	<u></u>		·		·—	<del>                                     </del>		Total	•	1
No   Year   Name   Father Name   Domicile   Date of Birth   CNIC No   200   School where posted   Date		1		· · · · · · · · · · · · · · · · · · ·	, ,	· · ·		Marks		t stament order and
No. Year Name Father Name Domicile Date of Birth CNIC No. 200 School where posted Date of Birth CNIC No. 2014 Muhammad Ejaz Khan Noor Janaa Karak 7.8.1989 14202-2154274-3 130.94 GHS Ghunda Shamshaki No.0174-26 dt.3.5.2014 No.016-20 DATED 14.03.2015 No.016-20 DATE	,	1						out of		Appointment of del and
Year   Name   Father Name   Domicile   Date of Birth   Cit		1	1	ļ	_		CNIC No.		School where posted	Date
2014   Muhammad Ejaz Khan   Noor Janaa   Karak   7.8.1989   14202-2354274-3   130.94   GHS Ghunda Shamshaki   No.1724-26 dt 3.5.2014   NO.916-20   N	No	Vear	Name	Father Name	Domicile	Date of Birth	CHIC NO	<del> </del>		
2014   Muhammad Ejaz Khan   Noor Janan   Karak   7.8.1989   14202-2354274-3   132.15   GHS CHANDA KHURRAM   NO.916-20   DATED 14.03.2015   No.916-20   DA	11.10	1				··· <u>·</u>	•			No 1724-26 dt.3.5.2014
2014   Muhammad Ejaz Khan   Noor Janaa   N		1 -				7 0 1080	14202-2354274-3	130.94	GHS Ghunda Shamshaki	-
1   2015   Muhammad Zahoor   KHAN WALI KHAN   KARAK   01.03.1987   142038277021-3   132.10   Old Schiller   No. 916-20   DATED 14.03.2015	- 1	2014	Muhammed Ejaz Khan -	Noor Janan	Karak	7.0.1707				NO.916-20
1   2015   Muhammad Zahoor   KHAN WALI KHAN   KARAK   01.03.1987   142038277021-3   132.10   Old Schiller   No. 916-20   DATED 14.03.2015		T :						122.16	CUS CHANDA KHURRAM	DATED 14.03.2015
Muhammad Shoaib		2015		PHANIMALTEMAN	KARAK	01.03.1987	142038277021-3	132.13	OH3 CHARDIC GAS	
2 2015 Anwar MUHAMMAd ANWAR KARAK 16.06.1985 14202-7174303-1 131-9 0130 0430 0430 0430 0430 0430 0430 0430	· <u> </u>	2015	Muhammad Zahoor	KHAN WALI KHAN	141.0.11					DAMED 14 03 2015
2 2015 Anwar MUHAMMAd ANWAR RARAK 10.00.1909			Muhammad Shoaib			1600 1005	14202-7214363-1	131.44	GHS CHANDA KHURRAM	DATED.14,03,2013
3 2015 Waheed Ullah ABDUL GHANI KHAN KARAK 13.05.1991 14203-7006352-1 120.05 GHS JATTA ISMAIL KHEL DATED.14.03.2015 NO.916-20 DO.916-20 DATED.14.03.2015 NO.916-20 DATED.14.03.2015 NO.	2	2015	Anwar	MUHAMMAd ANWAR	KARAK,	16.06.1983				NO 916-20
3   2015   Waheed Ullah   ABDUL GHANI KHAN   KARAK   13.05.1991   14203-7006352-1   120.05   GHS TARKLKHEL   NO.916-20   DATED 14.09.2015   NO.916-20   D	·:							1 1 1 1		DATED 14 03 2015
2015   Waheed Ullah   ABDUL GHANI KHAN   KARAK   10.04.1988   14202-5130003-1   128.13   GHS TARKLKHEL   DATED-14.03.2015   10.04.1988   14202-5130003-1   128.13   GHS TARKLKHEL   DATED-14.03.2015   10.04.1988   14202-5130003-1   128.13   GHS TARKLKHEL   DATED-14.03.2015   10.04.1988   14202-5130003-1   124.11   GHS DARESH KHEL   DATED-14.03.2015   10.04.1982   14203-7865735-5   124.48   GHS SHAHIDAN CHONTKA   DATED.14.03.2015   10.04.1982   14203-7865735-5   124.48   GHS SHAHIDAN CHONTKA   DATED.14.03.2015   10.04.1986   14203-7865735-5   124.41   GHS DARB SANGEENI   10.04.1982   14203-7865735-5   124.41   GHS DARB SANGEENI   10.04.1982   14203-7865735-5   124.41   GHS DARB SANGEENI   10.04.103.2015   10.04.1986   14203-7865735-5   124.41   GHS DARB SANGEENI   10.04.103.2015   10.04.1986   14203-7865735-5   124.41   GHS DARB SANGEENI   10.04.103.2015   10.04.1986   14203-7865735-5   124.41   GHS DARB   124.25   GHS TERI   10.04.103.2015   10						12.05.1001	14203-7006352-1	120.05	GHS JATTA ISMAIL KHEL	
4 2015 Muhammad Tayyeb ALI JAN KARAK 10.04.1988 14202-5130003-1 124.13 GHS DARESH KHEL NO.916-20 DATED.14.03.2015  5 2015 Shaheen Ullah KHAN HAKIM RAHMAN KARAK 03.08.1978 14202-9121204-7 127.62 GHS DARESH KHEL NO.916-20 DATED.14.03.2015  6 2015 Muhammad Farcog MAMREZ KHAN. KARAK 11.04.1982 14203-7865735-5 124.48 GHS SHAHIDAN CHONTRA NO.916-20 DATED.14.03.2015  7 2015 Asad Faraz SHAHID KHAN KARAK 20.04.1986 14202-4662339-1 124.41 GHS DABB SANGEENI NO.916-20 DATED.14.03.2015  8 2015 Haroon Iqbal SAR ANJAM KHAN KARAK 02.06.1987 14203-2251548-1 124.25 GHS TERI NO.916-20 DATED.14.03.2015  9 2015 Muhammad Jamil GHULAM NABI KARAK 03.03.1985 14202-1354339-7 123.6 GHS DABB NO.916-20 DATED.14.03.2015  10 2015 Naqib Ullah SHAHISTA KHAN KARAK 05.01.1991 14202-5677158-7 123.56 GHS MAMI KHEL NO.916-20 DATED.14.03.2015  10 2015 Kashif Adnan 10gBAL BAD SHAH KARAK 04.05.1988 14203-1292162-9 122.65 GHS DHAND EDAL KHEL NO.916-20 DATED.14.03.2015	3	2015	Waheed Ullah	ABDUL GHANI KHAN	KAKAK	13.03.1991				NO.910-20
4 2015 Muhammad Tayyeb ALI JAN RAKA 10.04.1788 14202-9121204-7 127.62 GHS DARESH KHEL DATED 14.03.2015 5 2015 Shaheen Ullah KHAN HAKIM RAHMAN KARAK 03.08.1978 14203-7865735-5 124.48 GHS SHAHIDAN CHONTKA NO.916-20 DATED 14.03.2015 6 2015 Muhammad Farcog MAMREZ KHAN. KARAK 11.04.1982 14203-7865735-5 124.48 GHS SHAHIDAN CHONTKA NO.916-20 DATED 14.03.2015 7 2015 Asad Faraz SHAHID KHAN KARAK 20.04.1986 14202-4662339-1 124.41 GHS DABB SANGENI NO.916-20 DATED 14.03.2015 8 2015 Harcon Iqbal SAR ANJAM KHAN KARAK 02.06.1987 14203-2251548-1 124.25 GHS TERI NO.916-20 DATED 14.03.2015 9 2015 Muhammad Jamiil GHULAM NABI KARAK 03.03.1985 14202-1354339-7 123.6 GHS DABB NO.916-20 DATED 14.03.2015 10 2015 Naqib Uhah SHAHISTA KHAN KARAK 05.01.1991 14202-5677158-7 123.56 GHS MAMI KHEL NO.916-20 DATED 14.03.2015 11 2015 Kashif Adnan 1QBAL BAD SHAH KARAK 04.05.1988 14203-1292162-9 122.65 GHS DHAND EDAL KHEL DATED 14.03.2015							1/202-5130003-1	128.13_	GHS.TARKLKHEL	-DA-LEData-ostzono
5 2015 Shaheen Ullah KHAN HAKIM RAHMAN KARAK 03.08.1978 14202-9121204-7 127.62 GHS DARESH KHEL DATED.14.03.2015 6 2015 Muhammad Faroog MAMREZ KHAN. KARAK 11.04.1982 14203-7865735-5 124.48 GHS SHAHIDAN CHONTRA NO.916-20 DATED.14.03.2015 7 2015 Asad Faraz SHAHID KHAN KARAK 20.04.1986 14202-4662339-1 124.41 GHS DABB SANGEENI NO.916-20 DATED.14.03.2015 8 2015 Haroon Iqbal SAR ANJAM KHAN KARAK 02.06.1987 14203-2251548-1 124.25 GHS TERI DATED.14.03.2015 9 2015 Muhammad Jamil GHULAM NABI KARAK 03.03.1985 14202-1554339-7 123.6 GHS DABB NO.916-20 DATED.14.03.2015 10 2015 Naqib Ullah SHAHISTA KHAN KARAK 05.01.1991 14202-5677158-7 123.56 GHS MAMI KHEL DATED.14.03.2015 11 2015 Kashif Adnan 1QBAL BAD SHAH KARAK 04.05.1988 14203-1292162-9 122.28 GHS ESAK KHUMARI DATED.14.03.2015		2015	Muharomad Tayyeh	ALI JAN	KARAK	10.04.1988	142.02 3130003			NO 916-20
5 2015 Shaheen Ullah KHAN HAKJM RAHMAN KARAK 03.08.1978 14203-7865735-5 124.48 GHS SHAHIDAN CHONTRA NO.916-20 DATED.14.03.2015  7 2015 Asad Faraz SHAHID KHAN KARAK 20.04.1986 14202-4662339-1 124.41 GHS DABB SANGEENI DATED.14.03.2015  8 2015 Haroon Iqbal SAR ANJAM KHAN KARAK 02.06.1987 14203-2251548-1 124.25 GHS TERI DATED.14.03.2015  9 2015 Muhammad Jamil GHULAM NABI KARAK 03.03.1985 14202-1554339-7 123.6 GHS DABB NO.916-20 DATED.14.03.2015  10 2015 Naqib Ullah SHAHISTA KHAN KARAK 05.01.1991 14202-5677158-7 123.56 GHS MAMI KHEL DATED.14.03.2015  10 2015 Kashif Adnan 1QBAL BAD SHAH KARAK 04.05.1988 14203-1292162-9 122.65 GHS DAND EDAL KHEL DATED.14.03.2015  10 2015 Kashif Adnan 1QBAL BAD SHAH KARAK 04.05.1988 14203-1292162-9 122.65 GHS DAND EDAL KHEL DATED.14.03.2015	·		Middle 117 year					127.62	GHS DARESH KHEL	DATED.14.03.2015
6 2015 Muhammad Farcog MAMREZ KHAN. KARAK 11.04.1982 14203-7865735-5 124.48 GHS SHAHIDAN CHONTRA DATED.14.03.2015  7 2015 Asad Faraz SHAHID KHAN KARAK 20.04.1986 14202-4662339-1 124.41 GHS DABB SANGEENI DATED.14.03.2015  8 2015 Haroon Iqbal SAR ANJAM KHAN KARAK 02.06.1987 14203-2251548-1 124.25 GHS TERI DATED.14.03.2015  9 2015 Muhammad Jamiil GHULAM NABI KARAK 03.03.1985 14202-1354339-7 123.6 GHS DABB NO.916-20 DATED.14.03.2015  10 2015 Naqib Ullah SHAHIS TA KHAN KARAK 05.01.1991 14202-5677158-7 123.56 GHS DHAND EDAL KHEL DATED.14.03.2015  11 2015 Kashif Adnan 1QBAL BAD SHAH KARAK 04.05.1988 14203-1292162-9 122.65 GHS DHAND EDAL KHEL DATED.14.03.2015		2015	Chahada Turak MTANI.	HAKIMRAHMAN	KARAK	03.08.1978	14202-9121204-7	127.02		NO.916-20
6 2015 Muhammad Faroog MAMREZ KHAN. KARAK 11.04.1982 14203-7865735-5 124.48 GHS DABB SANGEENI NO.916-20 DATED.14.03.2015 7 2015 Asad Faraz SHAHID KHAN KARAK 20.04.1986 14202-4662339-1 124.41 GHS DABB SANGEENI NO.916-20 DATED.14.03.2015 8 2015 Haroon Iqbal SAR ANJAM KHAN KARAK 02.06.1987 14203-2251548-1 124.25 GHS TERI NO.916-20 DATED.14.03.2015 9 2015 Muhammad Jamil GHULAM NABI KARAK 03.03.1985 14202-1354339-7 123.6 GHS DABB NO.916-20 DATED.14.03.2015 10 2015 Naqib Ullah SHAHISTA KHAN KARAK 05.01.1991 14202-5677158-7 123.56 GHS MAMI KHEL NO.916-20 DATED.14.03.2015 11 2015 Kashif Adnan 1QBAL BAD SHAH KARAK 04.05.1988 14203-1292162-9 122.65 GHS DHAND EDAL KHEL DATED.14.03.2015		- 2013	Shaneen Ohan KHAN	TEMONI COMMINI			1 12 22 22 2	10440	CHO SHAHIDAN CHONTICA	DATED.14.03.2015
Color   Colo	• •	11		34434BE7 PILASI	KARAK	11.04.1982.	14203-7865735-5	124.48	UNS STIAMETE	
7 2015 Asad Faraz SHAHID KHAN KARAK 20.04.1986 14202-4662339-1 124.21 OHIS DATED.14.03.2015 8 2015 Haroon Iqbal SAR ANJAM KHAN KARAK 02.06.1987 14203-2251548-1 124.25 GHS TERI DATED.14.03.2015 9 2015 Muhammad Jamil GHULAM NABI KARAK 03.03.1985 14202-1354339-7 123.6 GHS DABB DATED.14.03.2015 10 2015 Naqib Ullah SHAHISTA KHAN KARAK 05.01.1991 14202-5677158-7 123.56 GHS MAMI KHEL DATED.14.03.2015 11 2015 Kashif Adnan 1QBAL BAD SHAH KARAK 04.05.1988 14203-1292162-9 122.65 GHS DHAND EDAL KHEL DATED.14.03.2015	6	2015	Muhaminad Farcog	MAMICEZ KHAN.	1011011					NU.910-20
7 2015 Asad Faraz SHAHID KHAN KARAK 20.04.1986 14203-2251548-1 124.25 GHS TERI DATED.14.03.2015  8 2015 Haroon Iqbal SAR ANJAM KHAN KARAK 02.06.1987 14203-2251548-1 124.25 GHS TERI DATED.14.03.2015  9 2015 Muhammad Jamil GHULAM NABI KARAK 03.03.1985 14202-1354339-7 123.6 GHS DABB NO.916-20 DATED.14.03.2015  10 2015 Naqib Uhah SHAHISTA KHAN KARAK 05.01.1991 14202-5677158-7 123.56 GHS MAMI KHEL DATED.14.03.2015  10 2015 Kashif Adnan 1QBAL BAD SHAH KARAK 04.05.1988 14203-1292162-9 122.65 GHS DHAND EDAL KHEL DATED.14.03.2015  10 2015 Kashif Adnan 1QBAL BAD SHAH KARAK 04.05.1988 14203-1292162-9 122.65 GHS ESAK KHUMARI DATED.14.03.2015							4202-4662339-1	124.41	GHS DABB SANGEENI	DATED.14.03.2013
8 2015 Haroon Iqbal SAR ANJAM KHAN KARAK 02.06.1987 14203-2251548-1 124.25 GHS TERI DATED.14.03.2015 9 2015 Muhammad Jamil GHULAM NABI KARAK 03.03.1985 14202-1354339-7 123.6 GHS DABB DATED.14.03.2015 10 2015 Naqib Ullah SHAHISTA KHAN KARAK 05.01.1991 14202-5677158-7 123.56 GHS MAMI KHEL DATED.14.03.2015 10 2015 Kashif Adnan 1QBAL BAD SHAH KARAK 04.05.1988 14203-1292162-9 122.65 GHS DHAND EDAL KHEL DATED.14.03.2015	7	2015	Asad Fares	SHAHID KHAN	KARAK	20.04.1986	14202-4002555-1			NO.916-20
8 2015 Haroon Iqbal SAR ANJAM KHAN KARAK 02.06.1987 14202-1354339-7 123.6 GHS DABB NO.916-20 DATED.14.03.2015 9 2015 Muhammad Jamil GHULAM NABI KARAK 03.03.1985 14202-1354339-7 123.6 GHS MAMI KHEL NO.916-20 DATED.14.03.2015 10 2015 Naqib Ullah SHAHISTA KHAN KARAK 05.01.1991 14202-5677158-7 123.56 GHS MAMI KHEL NO.916-20 DATED.14.03.2015 11 2015 Kashif Adnan 1QBAL BAD SHAH KARAK 04.05.1988 14203-1292162-9 122.65 GHS DHAND EDAL KHEL DATED.14.03.2015	. : — <del>· '</del>		Apad 1 2/102				2251548 1	17475	GHS TERI	DATED.14.03.2015
9 2015 Muhammad Jamil GHULAM NABI KARAK 03.03.1985 14202-1354339-7 123.6 GHS DABB DATED 14.03.2015 10 2015 Naqib Ullah SHAHISTA KHAN KARAK 05.01.1991 14202-5677158-7 123.56 GHS MAMI KHEL DATED 14.03.2015 11 2015 Kashif Adnan 1QBAL BAD SHAH KARAK 04.05.1988 14203-1292162-9 122.65 GHS DHAND EDAL KHEL DATED 14.03.2015 10 2015 Kashif Adnan 1QBAL BAD SHAH KARAK 04.05.1988 14203-1292162-9 122.65 GHS DHAND EDAL KHEL DATED 14.03.2015		2015		EAR ANIAM KUAN	KARAK	02.06.1987	14203-2251548-1	124.23	0,10 121	NO.916-20
9 2015 Muhammad Jamil GHULAM NABI KARAK 03.03.1985 14202-1354339-7 123.6 GHS MAMI KHEL DATED.14.03.2015  10 2015 Naqib Ullah SHAHISTA KHAN KARAK 05.01.1991 14202-5677158-7 123.56 GHS MAMI KHEL DATED.14.03.2015  \$\frac{1}{2015}\$ Z015 Kashif Adnan 1QBAL BAD SHAH KARAK 04.05.1988 14203-1292162-9 122.65 GHS DHAND EDAL KHEL DATED.14.03.2015  **NO.916-20 DATED.14.03.2015 DATED.14.03.2015  **NO.916-20 DATED.14.03.2015 DATED.14.03.2015  **NO.916-20 DATED.14.03.2015 DATED.14.03.2015  **NO.916-20 DATED.14.03.2015 DATED.14.03.2015	8	2013	Haroon Iqbal	SAR ANTAN KHAN			,		CUODARR	DATED 14.03.2015
9 2015 Mullammad Jamil GHULAM NABY 13.015 14202-5677158-7 123.56 GHS MAMI KHEL DATED.14.03.2015  10 2015 Naqib Ullah SHAHISTA KHAN KARAK 05.01.1991 14202-5677158-7 123.56 GHS MAMI KHEL NO.916-20 DATED.14.03.2015  10 2015 Kashif Adnan 1QBAL BAD SHAH KARAK 04.05.1988 14203-1292162-9 122.65 GHS DHAND EDAL KHEL NO.916-20 DATED.14.03.2015  10 2015 Kashif Adnan 1QBAL BAD SHAH KARAK 04.05.1988 14203-1292162-9 122.28 GHS ESAK KHUMARI DATED.14.03.2015		· 1			MADAK	03.03.1985	14202-1354339-7	. 123.6	GHS DABB	
10 2015 Naqib Ullah SHAHISTA KHAN KARAK 05.01.1991 14202-367/138-7 123.36 GHS DHAND EDAL KHEL DATED 14.03.2015  \$1 2015 Kashif Adnan 1QBAL BAD SHAH KARAK 04.05.1988 14203-1292162-9 122.65 GHS DHAND EDAL KHEL DATED 14.03.2015	9	2015.	Muhammad Jamil	GHULAM NABI	VWINK.	1-03.03.13.90				NO.910-20
10 2015 Naqib Ullah SHAHISTA KHAN KARAK 05.01.1991 14203-1292162-9 122.65 GHS DHAND EDAL KHEL DATED 14.03.2015  \$1 2015 Kashif Adnan 1QBAL BAD SHAH KARAK 04.05.1988 14203-1292162-9 122.28 GHS ESAK KHUMARI DATED 14.03.2015							Li202-5677158-2	123.56	GHS MAMI KHEL	DATED, 14.03.2013
#1 2015 Kashif Adnan 1QBAL BAD SHAH KARAK 04.05.1988 14203-1292162-9 122.65 GHS DHAND EDAL KHEL DATED 14.03.2015	10	2015	Naoib I Illah	SHAHISTA KHAN	KARAK	05.01.1991	14202 2011 2011	+		NO 016-20
2015 Kashif Adnan 1QBAL BAD SHAH KARAK 04.05.1988 14203-1292162-9 122.28 GHS ESAK KHUMARI DATED 14.03.2015	10		Time Ottabl	<u> </u>					L	NU.910-20
1 2015 Kashif Adnan   IQBAL BAD SHAH   KARAK   04.05.1988   14203-5785468-9   122.28 GHS ESAK KHUMARI   DATED 14.03.2015	2.5					1	14203-1292162-0	122.65	GHS DHAND EDAL KHEL	4
12.21 1986 14703-6785468-9 122.28 GHS ESAK KHUMARI DATED 14.03.2015	, ,	2015	Kashif Adam	IOBAL BAD SHAH	KARAK	04.05.1988	14202 1272102-9	12.00	<del> </del>	110.916-20
14703-5785468-9 122.28 Orio Caracteria (12.28 Orio Caracteria)	. · · · · · · · ·	2013	Kusint Adilah			T	1		THE TOTAL KHI (MAR)	DATED 14.03.2015
	9.3					12 11 1906	14203-5785468-9	122.28	LCHS EXAK KITOMAKI	1
12 200 / Aminocricianian	12	29 5	Amjad: Reluman	AMALKHAN	KAKAK	1 1 1 1 1 200	1			



The regularization will not be in favour of those, who have not taken over charge Or his remained absent from duty are resign from service and also not for thosed who are under disciplinary proceedings.

2. Their Services shall be governed by the Khyber Pakhtunkhwa civil Servant Act 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and transfer of teachers, Lecturers, Instructors' and Doctors)regularity Act 2011 and such rules and regulations as may be issued from time to time by the Government.

3. Their Pay shall be released subject to the verification of Academic and professional documents and testimonials from the concerned Boards/Universities by this Office.

Their services will considered regular and they shall be eligible for pension / deduction of GP Fund and terms of the Khyber Pakhtunkhwa Act 1973 as amended in 2013.

Their services is liable to termination on one month notice from either side. In case of resignation without notice, their one month pay/allowance shall be forfeited to the Government.

They shall posses the same Qualifications and experience required for the subject post on regular basis.

7. Their regularization shall not effect the promotion quota of the existing holders of posts in respective service cadre. They shall rank Junior to all civil Servants belonging to the same service Or cadre, as the case may be, who are in Service on regular basis on the Govt: of the Khyber Pakhtunkhwa employees on the Elementary and Secondary Education (Appointment in regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.I 2018) and shall also rank Junior to such other persons, if any, who in pursuance of the recommendations of the Khyber Pakhtunkhwa Public service commission made before the commencement of the Act, are to be

appointed to the respective Service Or cadre, in respective of their actual Date of appointment. 8. Their Seniority shall be Determined on the basis of their continues services in cadre, Provided that if the date of continues Service in ease of Two Or more as the same, the employee

elder in age shall rank Senior to the younger one.

AE-II/CT Regularization 2018

...Copy\_forwarded\_for=information and necessary=action to the:=

1. PA to Director Elementary and secondary Education Khyber Pakhtunkhawa Peshawar.

2. PS to Secretary to Govt: of Khyber Pakhtoonkhawa Elementary and Secondary Education Khybere Pakhtoon Khawa Peshawar

3. Deputy Commissioner Karak.

4. All the Principal/Head Master GHSS, GHS, GMS in District Karak

5. DMO Karak.

B & A O Local Office.

EMIS Section Local Office.

Official Concerned.