


FORM OF ORDER SHEET

Court of _____

Appeal No. 160/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/01/2024	<p>The appeal of Mr. Saif Ullah Shah presented today by Mr. Muhammad Ayub Khan Shinwari Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Parcha Peshi is given to counsel for the appellant.</p> <p style="text-align: right;">By the order of Chairman  REGISTRAR</p>

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No 160 /2024

Saifullah Shah Versus Govt of KP through Secty (E & S) Edu & others

INDEX

Sr No	Description of document	Dated	Annex	Pg No
1.	Service Appeal and Affidavit			1-4
2.	Copy of advertisement		A	5
3.	Copies of judgment in W.P No 2548-P/2014	19-05-15	B	6-11
4.	Copy of Judgment of Supreme Court	06-10-16	C	12-15
5.	Copy of Notification	12-05-17	D	16
6.	Copy of Notification	19-03-18	E	17-18
7.	Copy of the appointment order of colleagues of Petitioner	02-05-14	F	19-20
8.	Copy of impugned seniority list		G	21-24
9.	Copy of Departmental Representation		H	25-26
10	Wakalat Nama			27

Dated: / /2023



Appellant,

Through



Muhammad Ayub Khan Shinwari

LL.B; LL.M

ADVOCATE

Supreme Court of Pakistan

CHAMBER

7-A, Haroon Mansion,

Khyber Bazar, Peshawar

Cell: (Clerk) 03219068514

Email: mak_shinwari@yahoo.com

1

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No 160 /2024

Saifullah Shah,
Arabic Teacher, GMS Wazir Abad, Torawari, HanguAppellant

Versus

1. Secretary to Govt of KP, Elementary & Secondary Edu Deptt, Peshawar
2. Director, Elementary & Secondary Education, KP, Peshawar
3. District Education Officer (Male), Hangu
4. Hafiz Faisal Iqbqal, AT, GHS Khazina Banda, District Hangu
5. Muhammad Rasool, AT, GHSS, Naryab, Distt Hangu
6. Malik Hussain Muhammad Khan, AT, GMS, Turki Banda, Distt Hangu
7. Muhammad Ishtiaq. AT, GMS, Darband, Distt HanguRespondents

**Service Appeal Under Section 4 of Khyber
Pakhtunkhwa Service Tribunal Act, 1974**

Respectfully Sheweth,

Brief but relevant facts of the case are as follows:

1. That a consolidated advertisement was published in the media of Press, wherein the post of T.T and A.T teachers were stated to be filled by initial recruitment. The prescribed qualification for the posts was Matric with Sanad Shahadat ul Alamia. Since the Appellant was meeting the requisite qualification applied for the post of A.T. (Copy of advertisement is filed herewith and annexed as **Annex-A**)
2. That after test and interview, the final merit list was displayed wherein the Appellant was granted only Matriculation marks and F.A marks, whereas marks for Shahadat ul Aalia and Shahadat ul Alamia were not awarded, thus the Appellant was not appointed against the aforesaid post. It is pertinent to mention here that once the marks for Shahadat ul Aalia and Shahadat ul Alamia are added to the marks of appellant, the appellant marks would be 103.43. Feeling aggrieved, the Appellant filed Writ Petition No 2548-P/2014 before the Honorable Peshawar High Court, Peshawar which was allowed vide Judgment dated 19-05-2015 wherein the respondents were directed to add the marks of aforesaid Asnads and issue the appointment order of the Appellant. (Copy of judgment is filed herewith and annexed as **Annex-B**)
3. That the aforesaid judgment of the Honorable Peshawar High Court, Peshawar was assailed before the August Supreme Court of Pakistan, wherein the judgment of the Honorable High Court was upheld vide

2

Judgment 06-10-2016. (Copy of Judgment is filed herewith and annexed as **Annex-C**)

4. That consequent upon the aforesaid judgment of the Honorable Peshawar High Court, Peshawar the Appellant was appointed as A.T (BPS-15) but with effect from the taking over of the charge vide Notification dated 12-05-2017. (Copy of the Notification is filed herewith and annexed as **Annex-D**)
5. That later on, the respondents regularized the service of the Appellant with effect from his date of appointment on the post of A.T i.e., 12-05-2017 under the KP Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 vide Notification Dated 19-03-2018. (Copy of Notification is filed herewith and annexed as **Annex-E**)
6. That it is pertinent to mention here that colleagues of the Appellant who had applied along with Appellant in pursuance of the aforesaid advertisement (Annex-A) had been appointed by the respondents against the posts of A.T vide Notification dated 02-05-2014. (Copy of the appointment Notification of the colleagues of the Appellant is filed herewith and annexed as **Annex-F**)
7. That now in the final seniority list of Arabic Teachers in District Hangu, the Appellant has been shown junior to those colleagues who had applied along with the Appellant in pursuance of the aforesaid advertisement (Annex-A) and had obtained less marks than the Appellant and similarly the Appellant is shown junior to those candidates who are appointed during the period commencing from 02-05-2014 to 11-05-2017 in pursuance of subsequent advertisements and recruitment process. (Copy of Seniority list is filed herewith and annexed as **Annex-G**)
8. That feeling aggrieved, the appellant filed departmental appeal but in vain. (Copy of Departmental Representation is filed herewith and annexed as **Annex-H**) Hence the instant service appeal on the following amongst other grounds:

Grounds:

- a. That the impugned seniority and the impugned seniority list is against the law, illegal, unlawful, without lawful authority and void ab-initio, thus liable to be set aside.
- b. That the treatment met to the Appellant is against the fundamental rights enshrined and protected under the Constitution of Islamic Republic of Pakistan, against the law, rules and policy on the subject matter which is their inalienable right under Article 4 of the Constitution of Islamic Republic of Pakistan, 1973.
- c. That the Appellant has been appointed against the post of A.T (BPS-15) vide Notification dated 21-05-2017 with effect from taking over the charge of the post on adhoc/contract basis later on regularized under the KP Employees

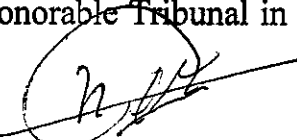
of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 vide Notification Dated 19-03-2018 with effect from 21-05-2017 , whereas similarly placed colleagues of the Appellant who had applied in pursuance of the same advertisement along with the Appellant and competed with him had been appointed vide Notification dated 02-05-2014 and had obtained less marks than the appellant had been placed senior to the appellant, similarly those Arabic Teachers who are appointed during the period of 02-05-2014 to 11-05-2017 have been placed senior than the appellant.


- d. That treatment met to the Appellant is against the KP Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 and dictums of the apex courts.
- e. That it is a settled principle of law that any employee illegally deprived from appointment, filed Writ Petition and High Court accepted the same while issuing direction to the competent authority to recommend/appoint the employee, such civil servant will be given seniority and service benefits from the date when the group along whom he/she qualified the test and interview was appointed. In this regard reliance is placed on 2018 PLC (CS) 482 (SC (AJ & K))
- f. That the Appellant crave permission of this Honorable Tribunal to rely on other grounds at the time of arguments and produce any additional document if required in support of his Service Appeal.

It is, therefore, prayed that on acceptance of the title Service Appeal the impugned final seniority list in District Hangu to the extent of Appellant may kindly be declared as against the law, illegal, unlawful, without lawful authority and ineffective upon the rights of the appellant and the respondents be directed to treat the appellant at par with his similarly placed colleagues i.e., those who are appointed on 02-05-2014 by placing his name on the due seniority number on the basis of merit by calculating his Shahadat ul Aalia and Shahadat ul Alamia marks and place the name of the appellant senior to respondent No 4 to 7; and

any other relief which has not been specifically prayed for and deemed fit and appropriate by this Honorable Tribunal in the circumstances may graciously be granted.

Through


 Appellant,



Muhammad Ayub Khan Shinwari
Advocate Supreme Court

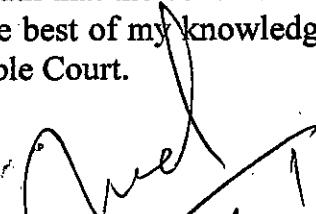

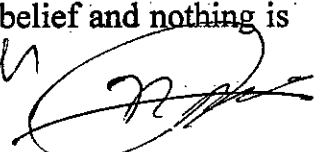
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IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

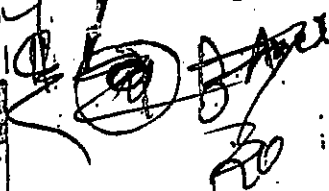
Service Appeal No _____/2023

Saifullah Shah Versus Govt of KP through Secty (E & S) Edu & others

AFFIDAVIT

I, Saifullah Shah, Arabic Teacher, GMS Wazir Abad, Torawari, Hangu do hereby solemnly affirm and declare on oath that the contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing is kept concealed from this Honorable Court.


26/1/23


Deponent

Attested


ادھک اسکول

ادھک اسکول کی ویب سائٹ پر درج شدہ معلومات کے تحت اسکول میں داخلہ لینے والے طلبہ کی فہرست (Adhoc School Based) تفریحی طور پر پیش کی گئی ہے۔ اس فہرست میں شامل طلبہ کی عمر 20 سال سے کم ہے اور وہ 2014ء کی درخواست نامہ میں شامل ہیں۔ درخواست نامہ میں ایس ایس ٹی (NTS) کی ویب سائٹ (<http://www.nts.org.pk>) پر دستیاب ہے یا جسے کونسل اور سرکار نے منظور کیا ہے۔ درخواست نامہ میں شامل طلبہ کی فہرست (Adhoc School Based) تفریحی طور پر پیش کی گئی ہے۔ اس فہرست میں شامل طلبہ کی عمر 20 سال سے کم ہے اور وہ 2014ء کی درخواست نامہ میں شامل ہیں۔ درخواست نامہ میں ایس ایس ٹی (NTS) کی ویب سائٹ (<http://www.nts.org.pk>) پر دستیاب ہے یا جسے کونسل اور سرکار نے منظور کیا ہے۔

نمبر	نمبر	تاریخ	مقام
1	15	18-35 سال	اسی (مراتھ)
2	15	18-35 سال	ڈی ایم (مراتھ)
3	15	18-35 سال	ڈی ای (مراتھ)
4	15	20-35 سال	ایس ایس ٹی (مراتھ)
5	15	20-35 سال	ایس ایس ٹی (مراتھ)
6	12	18-35 سال	ٹی آر سی (مراتھ)
7	12	13-35 سال	ایس ایس ٹی (مراتھ)

انتخابی عمل (Selection Criteria) کے تحت 200 نمبرات کی تقسیم اس طرح کی جائے گی۔ (الف) سکرٹریٹ نمبر 100=NTS (ب) ایس ایس ٹی 100= فوری طور پر تقسیم اس طرح ہوگی۔

تاریخ	مقام
18-35 سال	اسی (مراتھ)
18-35 سال	ڈی ایم (مراتھ)
18-35 سال	ڈی ای (مراتھ)
20-35 سال	ایس ایس ٹی (مراتھ)
20-35 سال	ایس ایس ٹی (مراتھ)
18-35 سال	ٹی آر سی (مراتھ)
13-35 سال	ایس ایس ٹی (مراتھ)

نوٹ:- (۱) اسکول کی آسانی کیلئے طلبہ کو ہر صبح اسکول میں داخلہ لینے کے لیے طلبہ کو ہر صبح اسکول میں داخلہ لینے کے لیے طلبہ کو ہر صبح اسکول میں داخلہ لینے کے لیے... (۲) ہر امیدوار اسے NTS درخواست نامہ 300 روپے چارج کیا جائے گا... (۳) ہر امیدوار اسے NTS درخواست نامہ 300 روپے چارج کیا جائے گا... (۴) ہر امیدوار اسے NTS درخواست نامہ 300 روپے چارج کیا جائے گا... (۵) ہر امیدوار اسے NTS درخواست نامہ 300 روپے چارج کیا جائے گا... (۶) ہر امیدوار اسے NTS درخواست نامہ 300 روپے چارج کیا جائے گا... (۷) ہر امیدوار اسے NTS درخواست نامہ 300 روپے چارج کیا جائے گا... (۸) ہر امیدوار اسے NTS درخواست نامہ 300 روپے چارج کیا جائے گا... (۹) ہر امیدوار اسے NTS درخواست نامہ 300 روپے چارج کیا جائے گا... (۱۰) ہر امیدوار اسے NTS درخواست نامہ 300 روپے چارج کیا جائے گا... (۱۱) ہر امیدوار اسے NTS درخواست نامہ 300 روپے چارج کیا جائے گا... (۱۲) ہر امیدوار اسے NTS درخواست نامہ 300 روپے چارج کیا جائے گا... (۱۳) ہر امیدوار اسے NTS درخواست نامہ 300 روپے چارج کیا جائے گا... (۱۴) ہر امیدوار اسے NTS درخواست نامہ 300 روپے چارج کیا جائے گا... (۱۵) ہر امیدوار اسے NTS درخواست نامہ 300 روپے چارج کیا جائے گا... (۱۶) ہر امیدوار اسے NTS درخواست نامہ 300 روپے چارج کیا جائے گا... (۱۷) ہر امیدوار اسے NTS درخواست نامہ 300 روپے چارج کیا جائے گا... (۱۸) ہر امیدوار اسے NTS درخواست نامہ 300 روپے چارج کیا جائے گا... (۱۹) ہر امیدوار اسے NTS درخواست نامہ 300 روپے چارج کیا جائے گا... (۲۰) ہر امیدوار اسے NTS درخواست نامہ 300 روپے چارج کیا جائے گا...

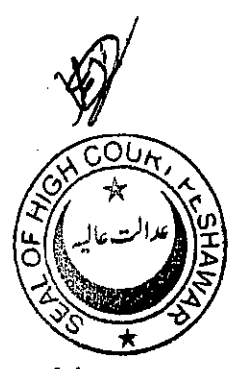
ادھک اسکول

ATTESTED

Amoy B 6

Attested by
[Signature]

BEFORE THE HON'BLE HIGH COURT PESHAWAR



W.P. No. 2568 / 2014

Saif Ullah Shah S/o Masood Shah R/o Darul Uloom Arabia,
District and Tehsil Thall, District Hangu.....(Petitioner)

VERSUS

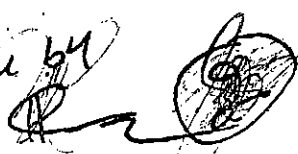
1. Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar *at dabqree garden Peshawar*
2. District Education Officer at Hangu (District Education Officer) at Hangu.
3. P.A to Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar *at dabqree garden Peshawar*
4. National Testing Service (N.T.S) House Plot No. 96, Street No. 4, Sector, H-8/1, Islamabad. *through its Chairman.* (Respondents)

WRIT PETITION UNDER ARTICLE 199 OF CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN, 1973, THAT AN APPROPRIATE ORDER/ REMEDY MAY BE PASSED TO APPOINT AND CONSIDER THE PETITIONER FOR THE POST OF A.T (ARABIC TEACHER) WHICH HAS BEEN ADVERTISED BY RESPONDENT NO. 2 AND 3. THE PETITIONER HAS BEEN IGNORED FROM THE SAID POST AND APPOINTED OTHER LESS MARKS CANDIDATES/ APPLICANSTS NAMELY SAIDA JAN ON SERIAL NO. 2 AND SADIQ GUL ON SERIAL 7 OF NOTIFICATION/ ORDER DATED

KNO
2443/15

FILED TODAY
Deputy Registrar
15 AUG 2014

ATTESTED
EXAMINER
Peshawar High Court
Peshawar

Attested by  7/1

02/05/2014 WHICH IS INJUSTICE AND
CLEAR CUT DISCRIMINATION WITH THE
PRESENT PETITIONER

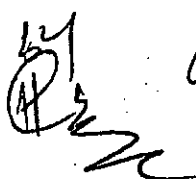

Respectfully Sheweth:

Facts giving rise to the present writ petition are as under:

1. That the petitioners are law abiding citizen of Pakistan.
(Copy of CNIC is attached as annexure "A").
2. That petitioner applied for the post of Arabic Teacher (A.T) BPS-15, but has been ignored by respondent No. 2.
(Copy of advetermiment is attached as annexure "B").
3. That petitioner qualified the N.T.S and obtained/ got the highest marks i.e. 107.79 from Saida Jan on serial No. 3 and Sadiq Gul on serial No. 7, but ignored the present petitioner from the said post.
4. That petitioner is eligible and well qualified for the said post i.e. Arabic Teacher (A.T) but appointed other candidates/ applicants which have less marks from the petitioner, but appointment by respondent No. 2, which is injustice and also discrimination with the present petitioner.

FILED TODAY
Deputy Registrar
15 AUG 2014

ATTESTED
EXAMINER
Peshawar High Court
Peshawar

Attested by  7/1 

5. That the petitioner has been left/ignored from the said post and appointed other candidates/ applicants namely Saida Jan on serial No. 3 and Sadiq Gul on serial No. 7 on the appointment notification/ order dated 02/05/2014. (Copy of appointment order is attached as annexure "C").
6. That petitioner verbally request to respondent No. 2 to appoint the petitioner on the said post and also explain his position that why he is not appointed on said post Arabic Teacher (A.T), but no response from respondent No. 2.
7. That petitioner also move/ submit on applicant Deputy Commissioner to inquire the illegal appointment order dated 02/05/2014. (Copy of application is attached as annexure "D").
8. That petitioner also strongly condemn the illegal appointments of the said post. (Copy of news paper cutting is attached as annexure "E").

FILED TODAY
Deputy Registrar
15 AUG 2014

ATTESTED
EXAMINER
Peshawar High Court
Peshawar

Attested [Signature]

8

9. That petitioner observed the legal codal formalities, but not appointed on the post of Arabic Teacher (A.T), but nor call for interview nor appointed for the said post, which is injustice with the present petitioner.

10. That all the citizens shall be treated equally under Article 25 of Constitution of Islamic Republic of Pakistan, 1973, that there shall be no discrimination on the base of creed and colour.

11. That petitioner will take other grounds at the time of arguments with the kind permission of this Hon'ble Court.

It is, therefore, most humbly prayed that on acceptance of this Writ Petition, the petitioner may be appoint and consider for the post of Arabic Teacher (A.T) BPS-15 at District Hangu, and the respondent No. 2 be directed to accommodate and appointed the petitioner on the post of Arabic Teacher, while the other colleagues/ batch mates appointed on very less marks while petitioner become ignored from the said post of A.T which is injustice and also discrimination with the present petitioner.

RECORDED
 13 JUL 2014

ATTESTED
 EXAMINER
 Peshawar High Court
 Peshawar

INTERIM RELIEF:

Handwritten signature and date 8/1

By way of interim relief, any other remedy may deem fit may be considered and suspend and set aside the impugned order dated 02/05/2014 which issued by respondent No. 2 unless and until the decision of this Hon'ble Court.

Petitioner

Through

Handwritten signature of Habib Ullah Mohmand

Dated: 11/08/2014

Habib Ullah Mohmand
Advocate High Court,
Peshawar.

CERTIFICATE:

Certified on instructions of my client that petitioner has not previously moved this Hon'ble Court under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 regarding the instant matter.

Handwritten signature of Advocate

ADVOCATE

LIST OF BOOKS:

FILED TODAY

Deputy Registrar
15 AUG 2014

1. Constitution of Islamic Republic of Pakistan, 1973
2. Any other law books according to need.

Handwritten signature of Advocate

ADVOCATE

ATTESTED
EXAMINER
Peshawar High Court
Peshawar

9

JUDGMENT SHEET
PESHAWAR HIGH COURT, PESHAWAR
JUDICIAL DEPARTMENT

Writ Petition No.2548-P/2014



JUDGMENT

Date of hearing.....19.5.2015.....

Petitioner(s) *(Saifullah Shah)* by *Mr. Habibullah Mohmand,*
Advocate.

Respondent(s) *(Director, E and S.E.)* by *Syed. Qaiser Ali Shah,*
BBA.

YAHYA AFIRDI, J.- Through this single judgment,

this Court proposes to dispose of two Writ Petitions as

common of questions of law and facts are involved

therein. The particulars of the said petitions are as

under:-

1. Writ Petition No. 2548-P/2014
(Saifullah Shah vs. Director
Elementary and Secondary
Education, Khyber Pakhtunkhwa,
Peshawar and others).
2. Writ Petition No. 2549-P/2014
(Saifullah Shah vs. Director
Elementary and Secondary
Education, Khyber Pakhtunkhwa,
Peshawar and others).

2. The petitioner, in the Writ Petition, has sought

the following prayer:-

*"It is, therefore, most humbly
prayed that on acceptance of this
Writ Petition, the petitioner may be*

9

ATTESTED
EXAMINER
Peshawar High Court
Peshawar

10

appointed and considered for the post of Arabic Teacher (A.T) BPS-15 at District Hangu, and the respondent No.2 be directed to accommodate and appointed the petitioner on the post of Arabic Teacher, while the other colleagues/batch mates appointed on very less marks while petitioner become ignored from the said post of A.T which is injustice and also discrimination with the present petitioner".

3. At the very outset, learned counsel for the petitioner states that the issue involved herein has already been decided by this Court on 14.2.2015 in Naeemullah Jan's case (Writ Petition No. 2144-P/2014). The relevant portion of the said judgment is as

under:

"The contention of the respondents-department that the certificate was not equivalent to MA as the petitioner had not qualified Pakistan Studies and Islamic Studies at the B.A. level has no legal foundation because the contents of the Certificate clearly indicates that it is equivalent to M.A. Degree for the purposes of teaching Arabic and Islamic Studies. The only conditionality marked therein was that in case of appointment in the fields other than teaching, the petitioner was required to qualify two additional elective Subjects of Pakistan Studies and Islamic Studies at the B.A. level, which was not the case of the petitioner before this Court.

9

ATTESTED
EXAMINER
Peshawar High Court
Peshawar

It is also an admitted position on record that the post of Qari (BPS-12) had fallen vacant at Adhoc Based School in District Nowshera, where the petitioner would have to teach the Islamic Subject, which is basically a teaching cadre post. Hence, the petitioner is entitled to the additional marks and there is no need for him to pass the Subjects of Pakistan Studies or Islamiyat in BA level.

Accordingly, for the reasons stated herein above, we allow the instant petition to the extent that the respondents-department shall grant additional marks to the petitioner for MA on the basis of the aforesaid Sanad/Certificate and thereafter consider him for appointment against the post of Qari (BPS-12)".

In view of the above clear findings, this Court also follows the same.

4. Accordingly, these Writ Petitions are allowed in the terms mentioned in Writ Petition No. 2144-P/2014 decided on 1.4.2015.

Dt.19.5.2015

[Signature]
JUDGE

[Signature]
JUDGE

Nawab Shah

CERTIFIED TO BE TRUE COPY
EXAMINER
Peshawar High Court, Peshawar
Authorized Under Article 8, 7 of
the Qanun-e-Shahadat Act 1984
17 JAN 2024

29133
Date of Presentation of Affidavit 17-01-2024
No of Pages 9-P
Copying Fee
Total 36-00
Date of 17-01-2024
Date of Delivery 17-01-2024

IN THE SUPREME COURT OF PAKISTAN
(APPELLATE JURISDICTION)

Annex C 12/2014

PRESENT:

MR. JUSTICE EJAZ AFZAL KHAN.
MR. JUSTICE IQBAL HAMEEDUR RAHMAN.

C. P. NO. 12-P OF 2014, CMA. 17-P OF 2014 IN C. P. NO. 12-P OF 2014.
(On appeal against the judgment dated 27.05.2013, 01.04.2015, 19.05.2015, 10.11.2015, 16.11.2015 and 03.03.2016 passed by the Peshawar High Court, Mingora Bench (Dar-ul-Qaza), Swat and Peshawar High Court, Peshawar in C. R. Nos. 934-M to 937-M of 2012 and W. P. Nos. 2144/2004, 2548-P to 2549-P/14, 121/2012, 3788-P/2014 and 1047-P of 2015).

Govt. of KPK thr. Secy., Elementary and Secondary Education and others.

...Petitioner(s)

Versus

Muhammad Tahir and others.

...Respondent(s)

AND

C. P. NO. 278-P OF 2015, CMA, 549-P OF 2015 IN C. P. NO. 278-P OF 2015.

Govt. of KPK thr. Secy., Elementary and Secondary Education, Peshawar and others.

...Petitioner(s)

Versus

Naeemullah Jan.

...Respondent(s)

AND

C. P. NO. 350-P OF 2015, CMA. 661-P OF 2015 IN C. P. NO. 350-P OF 2015.

Director Elementary and Secondary Education, Peshawar and others.

...Petitioner(s)

Versus

Saifullah Shah and others.

...Respondent(s)

AND

C. P. NO. 351-P OF 2015, CMA. 662-P OF 2015 IN C. P. NO. 351-P OF 2015.

Director Elementary and Secondary Education, Peshawar and others.

...Petitioner(s)

Versus

Saifullah Shah and others.

...Respondent(s)

AND

C. P. NO. 656-P OF 2015, CMA. 2034-P OF 2015 IN C. P. NO. 656-P OF 2015.

Deputy Commissioner Gulkada Swat and another.

...Petitioner(s)

Versus

Shams-ur-Rehman.

...Respondent(s)

AND

ATTESTED

ATTESTED

Court Associate
Supreme Court of Pakistan
Islamabad

ATTESTED

13

C. P. NO. 657-P OF 2015, CMA, 2036-P OF 2015 IN C. P. NO. 657-P OF 2015,

Deputy Commissioner Gulkada Swat and another. ...Petitioner(s)

Versus

Noor ul Huda and others.

...Respondent(s)

AND

C. P. NO. 673-P OF 2015, CMA, 2055-P OF 2015 IN C. P. NO. 673-P OF 2015,

District Coordination Officer now Deputy Commissioner Gulkada, Swat and another. ...Petitioner(s)

Versus

Abdul Khaliq.

...Respondent(s)

AND

C. P. NO. 1-P OF 2016, CMA, 1-P OF 2016 IN C. P. NO. 1-P OF 2016,

Govt. of KPK thr. Secy., Elementary and Secondary Education, Peshawar and others. ...Petitioner(s)

Versus

Abid-ur-Rehman.

...Respondent(s)

AND

C. P. NO. 44-P OF 2016, CMA, 75-P OF 2016 IN C. P. NO. 44-P OF 2016,

Govt. of KPK thr. Secy., Education, Peshawar and another. ...Petitioner(s)

Versus

Razaullah and another.

...Respondent(s)

AND

C. P. NO. 239-P OF 2016, CMA, 416-P OF 2016 IN C. P. NO. 239-P OF 2016,

Govt. of KPK thr. Secy., Elementary and Secondary Education, Peshawar and others. ...Petitioner(s)

Versus

Qari Rahat Ullah and others.

...Respondent(s)

For the petitioner(s): Mian Arshad Jan, Addl. A. G. KPK.
Mian Saad Ullah Jandoli, AOR (Absent)

For respdt. No. 1: Mr. Dil M. Khan Alizai, ASC.
Mr. Mehmood A. Sh., AOR.
(in CP. 350-P/15).

For respdt. No. 2: Mr. Mir Afzal Malik, ASC.
Ch. Akhtar Ali, AOR.
(in CP. 351-P/15).

For respdt. No. 1: Mr. Ijaz Anwar, ASC.
(in CPs. 656-P, 657-P/15 & 239-P/16 respectively).

ATTESTED

ATTESTED

Court Associate
Supreme Court of Pakistan
Islamabad

ATTESTED

14

On Court Notice : Sajid Ejaz Hotiana, ASC.
on behalf of HEC. Raja Abdul Ghafoor, AOR.
Shahid Khalid, Law Officer.

Date of Hearing: 06.10.2016.

ORDER

EJAZ AFZAL KHAN, J.- CIVIL PETITIONS NO. 12-P/2014, 656-P TO 657-P/15 AND 673-P/2015. These petitions are hopelessly time barred. No reason much less plausible has been given for condonation of delay. These petitions together with CMAs for condonation of delay are thus dismissed.

CIVIL PETITIONS NOS. 350-P/15, 351-P/15, 278-P/15, 1-P/16, 44-P/16 and 239-P/16. These petitions for leave to appeal have arisen out of the judgment dated 19.05.2015, 01.04.2015, 10.11.2015, 16.11.2015 and 03.03.2016 of learned Division Benches of the Peshawar High Court, Peshawar whereby they allowed the writ petitions filed by the respondents.

As a common question of law is involved in these petitions, they are disposed of by single judgment.

2. Learned Addl. A. G. appearing on behalf of the petitioner contended that where the certificates, the respondents are possessed of are not equivalent to M.A., unless they pass the subjects of Pakistan Studies and Islamic Studies at B.A. level, they are not entitled to additional marks, therefore, the impugned judgments upholding grant of such marks are liable to be set aside.

3. The learned ASCs appearing on behalf of the respondents contended that when a good number of person similarly placed have been given additional marks, appointed on their strength and are continuing as such without being questioned at any level, the respondents could not be treated differently.

4. We have gone through the record carefully and considered the submissions of the learned Addl. A. G. as well as learned ASCs for the respondents.

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Court Associate
Supreme Court of Pakistan
Islamabad

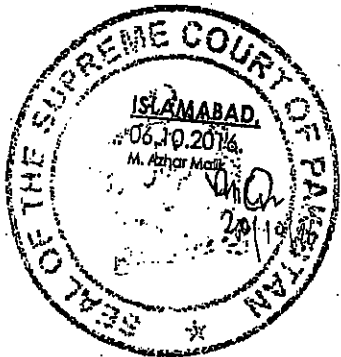
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15

5. The record reveals that many persons having similar qualification were given additional marks and appointed as such. On annulment of their appointment, they filed writ petitions which were allowed. Many of the judgments passed in the writ petitions filed by the appointees have not been questioned while some of the petitions questioning such judgments having been filed after the expiration of more than two years have been dismissed by this Court. What is the reason for pick and choose and double standard for the appointees in these petitions whose cases on no account are distinguishable from other appointees is not understandable. We, thus, would not become party to this pick and choose when it is not based on intelligible differentia.

6. For the reasons discussed above, these petitions being without merit are dismissed and the leave asked for is refused. CMAs seeking stay are also dismissed accordingly.

Sd/- Ejaz Afzal Khan, J.
Sd/- Iqbal Hameedur Rahman, J.
Certified to be True Copy



[Signature]
Court Associate
Supreme Court of Pakistan

ATTESTED

CR No: 1111/14 Civil/Criminal
 Date of presentation: 06-10-14
 No of Pages: 100
 No of Folios: 100
 Requisites: 5-00
 Copy Fee: 1000/-
 Court Fee: 1000/-
 Date of filing: 24/10/14
 Date of issue: 24/10/14
 Compared by: [Signature]
 Received by: [Signature]

ATTESTED

Annex D 16



OFFICE OF THE DISTRICT EDUCATION OFFICER MALE
DISTRICT HANGU

deohangu@gmail.com

Phone 0925-621083



Say No to Corruption

OFFICE ORDER

In compliance with order/judgment of Peshawar High Court Peshawar announced on 19-05-2015 passed in Writ Petition No. 2550-P/2014, Advocate General letter vide No 18600-02/AG dated 07-12-2016, DEO (Male) Nowshera Endst: No. 2810-17/DEO(M)NSR/EA-S/Apptt./PHCP/1210-2012 dated Nowshera the May 21-2016 & charge exemption vide Endst: No. 4595-98 dated 24-05-2016. Keeping the above the competent authority is pleased to appoint **Mr. Saif Ullah Shah s/o Masood Shah Mohallah:- Darul Uloom Arabia Thall, District Hangu** as a Arabic Teacher at Govt: Middle School Wazir Abad Hangu on adhoc School Based in PBS-15 (Rs. 13510-1120-47110) @ Rs. 13510/- fixed per month plus usual allowance on contract under the existing policy of the provincial Government, in Teaching Cadre on the terms & conditions given below in the interest of public service with effect from the date of taking over charge.

Terms & Conditions

1. The appointment is subject to the final decision of the Supreme Court of Pakistan CPLA.
2. His appointment is purely on Temporary & Contract basis initially for one year.
3. His service shall be governed by such rules and regulations as may be issued from time to time by the Government.
4. His service shall be terminated at any time in case his performance is found unsatisfactory during his contract period. In case of misconduct, he shall be preceded under the rules framed from time to time by the Government.
5. His appointment is made on School Based, he shall have to serve at the place of his posting & his service is not transferable to any other station.
6. Charge report should be submitted to all concerned in duplicate.
7. He should not be handed over if exceed 35 years or below 18 years of age. Age relaxation case may be submitted to competent authority.
8. Appointment is subject to the condition that the certificate/documents/CNIC must be verified from the concerned authority by the District Education Officer (Male) Hangu, and if anyone found to have produced bogus certificate/degree/testimonials shall be reported on the law enforcing agencies for action.
9. His service is liable to terminated on one month notice from either side. In case of resignation without prior notice his one month pay and allowances shall be forfeited in favour of Government.
10. The pay of appointee shall not be drawn/released by the District Account Office/Drawing & Disbursing Officer concerned until & unless a certificate to the effect by District Education Officer (Male) Hangu is issued that his certificate/degrees/transcripts have been verified from the concerned authorities.
11. He should join his post within 15 days of the issuance of this notification. In case of failure to join the post within 15 days of issuance of this order, his appointment shall be expire automatically and no subsequent appeal etc shall be entertained.
12. Health & age certificate shall be produced from Medical Superintendent Hangu (concerned) before taking over charge.
13. No TA/DA etc is allowed for joining the post.
14. Before handed over charge once again his document must be checked and if he does not possess the required relevant qualification as per rules & policy or he do not belong to the District where he has appointed in he shall not be handed over charge of the post.

Muhammad Shaukat
DISTRICT EDUCATION OFFICER MALE
DISTRICT HANGU

Endst: No. 2654-60 / File. Apptt: AT (NTS)-2017 Dated Hangu the 12/05/2017

Copy forwarded for information and necessary action to the:-

1. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
3. Principal /Head Masters concerned.
4. District Accounts Officer Hangu.
5. Budget & Account Officer Local Office.
6. DEMIS Cell Local Office.
7. Officials Concerned.
8. M/File.

ATTESTED
12/5/17
DY: DISTRICT EDUCATION OFFICER MALE
DISTRICT HANGU

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)****DISTRICT HANGU**

deohangu@gmail.com

Say No to Corruption

Phone 0925-621083

Notification:

Under the Provision of the Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018), and in pursuance of the Govt: of Khyber Pakhtunkhwa Notification No.50(S/F)E&SED/3-2/2018/SITT/Contract the Services of the following Arabic Teachers (AT), appointed on Adhoc/Contract basis, are hereby regularized in BPS-15, on the same posts in Teaching Cadre on the terms and condition given below with effect from the date of their appointment on the AT post :-

(Arabic Teacher (AT))

SR	ROLL NO	NAME	PERMANENT ADDRESS	TOTAL MARKS [OUT OF 200]	SCHOOL WHERE POSTED	APPTT: ORDER NO. AND DATED
1	1840010	BASHEER AHMAD	MOH: MUSLIM ABAD M.KHAWAJA HANGU	124.6	GHS CHAMBA GUL	Endst: No. 892-97/ File.Apptt: AT-2014 Dated Hangu the 02 /05/2014.
2	1840022	IZAT KHAN	MOH: NIAZ BANDA KARBOGHA SHARIF DISTT: & THE: HANGU	99.92	GHS CHAPRI WAZIRAN.	Endst: No. 892-97/ File.Apptt: AT-2014 Dated Hangu the 02 /05/2014.
3	1840078	SAIDA JAN	BEHRAM SHE GHANDRI WAZIRAN HANGU.	102.91	GHS THALL	Endst: No. 892-97/ File.Apptt: AT-2014 Dated Hangu the 02 /05/2014.
4	1840002	HAFIZ ABDUL MAJEED	VILL: SHAHU KHEL DISTT: & TEH: HANGU.	129.87	GMS KHATTAK BANDA	Endst: No. 892-97/ File.Apptt: AT-2014 Dated Hangu the 02 /05/2014.
5	1840031	MUHAMMAD IBRAHIM	MOH: SANGHER DISTRICT HANGU	107.84	GMS BARH ABBAS KHEL	Endst: No. 892-97/ File.Apptt: AT-2014 Dated Hangu the 02 /05/2014.
6	1840048	MUHAMMAD AZAM	MOH: SAID KHEL CHAPRI NARYAB HANGU	108.7	GHS TOGH SARI	Endst: No. 892-97/ File.Apptt: AT-2014 Dated Hangu the 02 /05/2014.
7	1840036	SADIQ GUL	VILL: GHANDARI P/O THALL DISTT: & THE: HANGU.	104.06	GMS QADRI BANDA	Endst: No. 892-97/ File.Apptt: AT-2014 Dated Hangu the 02 /05/2014.
8	841300061	HAFIZ FAISAL IQBAL	MUHAMMAD KHAWAJA TEHSIL & DISTRICT HANGU.	110.68	GHS KHAZINA	Endst: No.4146-54/ File.Apptt: AT(nts)-2015 Dated Hangu the 15 /05/2015.
9	841300016	MUHAMMAD RASOOL	MOHALLAH HASSAN ZAI NARYAB DISTRICT HANGU	110.64	GMS CHAPRI NARYAB	Endst: No. 10678-90/ File. Apptt: AT(NTS)-2016 Dated Hangu the 14 /05/2016.
10	841300041	MALIK HUSSAIN MUHAMMAD KHAN	MOH: BAHADAR GHARI DISTRICT HANGU	94.03	GMS TURKI BANDA	Endst: No. 10678-90/ File. Apptt: AT(NTS)-2016 Dated Hangu the 14/05/2016.
11	8413000038	MUHAMMAD ISHTIAQ	AL MADINA PHS SANGIRH HANGU	104.47	GMS DARBAND HANGU	Endst: No.7601-11/ File.Apptt: AT(NTS)-2016-17 Dated Hangu 11 05/2017.
12	1840042	SAIF ULLAH SHAH	MOH: DARUL ULOOM ARABIA THALL HANGU	54.79	GMS WAZIR ABAD TORAWARI HANGU	Endst: No.7654-60/ File.Apptt: AT(NTS)-2017 Dated Hangu the 12/05/2017.

TERMS & CONDITIONS.

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

ATTESTED

Their services shall be governed by the Khyber Pakhtunkhwa Civil Servant Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting & Transfer of Teachers, Lecturers, Instructor & Doctors) Regulatory Act, 2011, and such rules & regulations as may be issued from time to time by the Government.

3. Their pay shall be released subject to verification of academic documents/testimonials from the concerned Board/University by the District Education Officer Concerned.
4. Their services shall be considered regular and they shall be eligible for pension/deduction of GP Fund in terms of the Khyber Pakhtunkhwa Civil Servants Act, 1973 as amended in 2013.
5. Their services are liable to termination on one month notice from either side. In case of resignation without notice, their one month pay/allowances shall be forfeited to the Government.
6. They shall possess the same qualification and experience required for a regular post.
7. Their regularization shall not affect 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 cadre, as the case may be, who are in service on regular basis on the commencement of the Khyber Pakhtunkhwa Employees (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018) and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.
8. Their seniority shall be determined on the basis of their continuous services in cadre, provided if the date of continuous service in case of two are more employees is the same the employee elder in age shall rank senior to the younger one.
9. Errors and omission will be acceptable within the specific period.

(Muhammad Iqbal Bangash)

District Education Officer (Male)

District Hangu

Endst: No. 8836-46 / File/Regularization of Adhoc Apptt: 2018: Dated Hangu the 19/03/2018

Copy forwarded for information and necessary action to the: -

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
3. District Nazim District Hangu.
4. Deputy Commissioner District Hangu.
5. District Account Officer Hangu.
6. Principals/Head Masters Concerned.
7. District Monitoring Officer District Hangu.
8. DEMIS Cell local office.
9. Budget & Account officer local office.
10. Officials Concerned.
11. PA to the DEO (M) Hangu.
12. Office Copy.

Dy: District Education Officer (Male),
District Hangu

ATTESTED



OFFICE OF THE DISTRICT EDUCATION OFFICER,
MALE DISTRICT HANGU

APPOINTMENT ORDER:

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Arabic Teacher (AT) School based in BPS-15 @Rs.8500/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge:-

S.#	Name	Father's Name	Domicile	Permanent Address	Place of posting
1	Basheer Ahmad	Gulab Noor	Hangu	Moh: Muslim Abad M.Khawaja Hangu	GHS Chamba Gul
2	Izat Khan	Gul war Khan	Hangu	Moh: Niaz Banda Karbogha Sharif Distt: & The: Hangu	GHS Chapri Waziran.
3	Saida Jan	Zara Jan	Hangu	Behram She Ghandri Waziran Hangu.	GHS Thall
4	Hafiz Abdul Majeed	Muhammad Ayaz	Hangu	Vill: Shahu Khel Distt: & Teh: Hangu.	GMS Khattak Banda
5	Muhammad Ibrahim	Hafiz Shafi Muhammad	Hangu	Moh: Sangher Hangu	GMS Barh Abbas Khel
6	Muhammad Azam	Din Bad Shah	Hangu	Moh: Said Khel Chapri Naryab Hangu	GMS Khazina Banda
7	Sadiq Gul	Sahib Gul	Hangu	Vill: Ghandari P/O Thall Distt: & The: Hangu.	GMS Qadri Banda
8	Daud Ahmad	Muhammad Rafiq	Hangu	Moh: Bazar Khel Darsamand Distt: & The: Hangu.	GMS Turki Banda

TERMS & CONDIATION

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year.
4. They should not be handed over charge if he exceeds 35 years or below 18 years of age. Age relaxation case may be submitted to competent authority.
5. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by their drawing and disbursing officer (concerned) any one found producing bogus Certificate will be reported to the law enforcing agencies for further action.
6. His services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
7. Pay will not be drawn until and unless a certificate to the effect by DEO(concerned) is issued that his certificates are verified
8. They should join his post within 10 days of the issuance of this notification. In case of failure to join their post within 10 days of the issuance of this notification, his appointment will expire automatically and no subsequent appeal etc shall be entertained.

ATTESTED

9. Health and Age Certificate should be produced from the Medical Superintendent DHQ Hospital Hangu before taking over charge.
10. He will be governed by such rules and regulations as may be issued from time to time by the Govt.
11. His services shall be terminated at any time, in case his performance is found unsatisfactory during his contract period. In case of misconduct, he shall be preceded under the rules framed from time to time.
12. His appointment is made on School based, He will have to serve at the place of posting, and His service is not transferable to any other station.
13. Before handing over charge once again their document may be checked if they have not the required qualifications they may not be handed over charge.


(HAZIQ UR RAHMAN)
DISTRICT EDUCATION OFFICER
MALE HANGU.

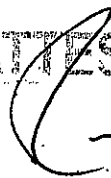
Endst: No. **892-97** / File Appt: AT-2014 Dated Hangu the **02/05/2014**.

Copy forwarded for information and necessary action to the: -

1. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Principal / Head Masters concerned.
3. District Accounts Officer Hangu.
4. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
5. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
6. Official Concerned.
7. M/File / EMS Cell local office


DY: DISTRICT EDUCATION OFFICER
MALE HANGU.


JAHANGIR BANGASH

ATTESTED


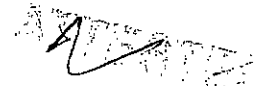
Annex C 21

Office Of The District Education Officer (Male) District Hangu													
S.N o	Name of School	Teacher Name	Father Name	Domicile	BPS	Acad: Qualif:	BA Division	Prof: Qualifi:	DOB	D/O 1st Appt:bn Edu:Deptt:	D/O Regular Appt: against the Post.	D/O taking Over Charge on the Present Post	D/O Taking over charge at the present post as SAT in this District .
1	GMS MAMOON BANDA	Abdul Haleem	Nawaz Khan	Karak	16	SSC	=	Almia	20/04/1963	05/03/1987	05/03/1987	05/03/1987	27/02/2013
4	GHSS IBRAHIMZAI	Riaz Ali	Abdul Ali	Hangu	16	FA	=	Almia	04/04/1969	12/04/1999	12/04/1999	12/04/1999	27/02/2013
5	GHS SHANAWARI HANGU	Shaheed Ullah	Wali Khan	Hangu	16	SSC	=	Almia	30/12/1969	08/07/1997	15/04/1999	15/04/1999	27/02/2013
6	GHS GANDERI WAZIRAN	Qudrat Khan	Abdullah Khan	Hangu	16	MA(Arab ic)	2nd	Almia	08/03/1968	01/10/1986	10/12/1999	10/12/1999	27/02/2013
7	GMS WACH BAZAR	Fazal Asghar	Noor Asghar	Hangu	16	SSC	=	Almia	01/09/1964	01/03/1993	08/09/1994	08/09/1994	27/02/2013
8	GHS BAGHTOO	Saeed Ur Rehman	Haleem Gul	Orakzai	16	MA	2nd	Almia	01/07/1970	04/09/1994	04/09/1994	04/09/1994	27/02/2013
9	GHS SHANAWARI NARYAB	Abdul Jabbar	Sarwar Khan	Hangu	16	SSC	=	Almia	01/07/1970	21/04/2005	21/04/2005	21/04/2005	27/02/2013
10	GHS AZIMI BANDA	Basir Mohammad	Khan Muhammad	Hangu	16	MA	1st	Almia	01/12/1976	21/04/2005	21/04/2005	21/04/2005	27/02/2013
11	GHS NARYAB	Momeen Bat Khan	Sher Mat Khan	Hangu	16	SSC	=	Almia	31/12/1976	21/04/2005	21/04/2005	21/04/2005	27/02/2013
12	GHSS M.KHAWAJA	Abdul Jabar	Nek Mar Jan	Hangu	16	MA Bed	2nd	Almia	05/04/1980	21/04/2005	21/04/2005	21/04/2005	27/02/2013
13	GMS TOGH CHAPPER	Abdullah Khan	Pir Muhammad	Hangu	16	SSC	=	Almia	31/12/1969	22/04/2005	22/04/2005	22/04/2005	
14	GHSS DOABA	Muhammad Nawaz	Rawan Shah	Hangu	16	MA(Arab ic)	2nd	BEd	15/09/1976	22/04/2005	22/04/2005	22/04/2005	24/08/2016
15	GHS MIANJI KHEL	S. Zamir Ul Hassan	S.Amir Hussain	Hangu	16	SSC	=	Almia	07/01/1971	23/04/2005	23/04/2005	23/04/2005	09/03/2019

APPROVED

Office Of The District Education Officer (Male) District Hangu

S.N o	Name of School	Teacher Name	Father Name	Domicile	BPS	Acad: Qualifi:	BA Division	Prof: Qualifi:	DOB	D/O 1st Appitt:in Edu:Deptt:	D/O Regular Appitt: against the Post.	D/O taking Over Charge on the Present Post	D/O Taking over charge at the present post as SAT in this District.
16	GMS JOUZARA	Sabir Ali	Janat Ali	Hangu	15	MA	2nd	Almia	04/04/1971	23/04/2005	23/04/2005	23/04/2005	
17	GMS NAYAN BANDA	M.Safiullah Safi	Sharif Khan	Hangu	16	MA	2nd	Almia	12/06/1978	23/04/2005	23/04/2005	23/04/2005	22/12/2020
18	GHS NO.2 HANGU	S. Mujtaba Hassan	S. Hamid Hussain	Hangu	16	BA Alamia	=	Almia	23/02/1970	30/04/2005	30/04/2005	30/04/2005	24/11/2021
19	GMS SAMANA	Abdul Latif	Muhammad Saeed	Hangu	16	(Arabic/Isa Alamia)	=	Almia	04/10/1973	23/04/2005	01/09/2007	01/09/2007	24/11/2021
20	GHS RAISAN	Ghayour Said	S. Muhammad Abas	Hangu	16	BA Alamia	=	Almia	12/10/1975	01/09/2007	01/09/2007	01/09/2007	24/11/2021
21	GMS DORARI BANDA	Ghazi Ur Rehman	Noorab Khan	Hangu	16	BA Alamia	=	Almia	10/02/1976	01/09/2007	01/09/2007	01/09/2007	24/11/2021
22	GHSS DALLAN	Muhammad Jan	Hakeem Khan	Hangu	16	BA Alamia	1ST	BED	28/08/1977	08/04/2004	01/09/2007	01/09/2007	24/11/2021
23	GHS SHAMAL DIN	Rahman Ud Din	Wazir Hashim	Hangu	16	FA	=	Almia	22/01/1978	01/09/2007	01/09/2007	01/09/2007	
24	GHS SHAHU KHEL	Ghulam Sadiq	Muhammad Khaliq	Hangu	15	MA	2nd	BEd	05/04/1978	01/09/2007	01/09/2007	01/09/2007	
25	GHS DARSHI	Gul Noor	Taj Ali Khan	Hangu	15	FA		Almia	01/05/1978	21/04/2005	01/09/2007	01/09/2007	
26	GMS GHALO CHINA	Ali Akbar	Mamy Khan	Hangu	15	M.A Med	=	Almia	09/04/1979	01/09/2007	01/09/2007	01/09/2007	
27	GHSTARI BANDA	Mutazir Mehdi	Imron Ali	Hangu	15	FA	=	Almia	04/04/1984	01/09/2007	01/09/2007	01/09/2007	
28	GMS ANAR CHINA	Shahid Mehmood	Khial Khan	Hangu	15	SSC	=	Almia	10/10/1978	01/09/2009	01/09/2009	01/09/2009	
29	GHS CHAMBA GUL	Muhammad Raiz	Rait Khan	Hangu	15	SSC	=	Almia	05/05/1979	01/09/2009	01/09/2009	01/09/2009	
30	GHS THALL	Habib Ur Rehman	Jan Muhammad	Hangu	15	FA		Almia	04/02/1982	01/09/2009	01/09/2009	01/09/2009	
31	GMS CHAPPRI NARYAB	Ajmir Khan	Fazal Janan	Hangu	15	FA	=	Almia	16/03/1982	01/09/2009	01/09/2009	01/09/2009	
32	GHS KAHI	Muhammad Rauf	Dawar Khan	Hangu	15	FA	=	Almia	15/07/1983	01/09/2009	01/09/2009	01/09/2009	
33	GHS BILYAMINA	Samiullah	Muhamamd Umer	Hangu	15	BA	2nd	Almia	04/02/1984	08/04/2004	01/09/2009	01/09/2009	
34	GHS CHAPRI WAZIRAN	Zia Ul Haq	Shamasul Haq	Hangu	15	FA	=	Almia	10/03/1984	03/09/2009	03/09/2009	03/09/2009	


 District Education Officer (Male) District Hangu

Office Of The District Education Officer (Male) District Hangu

S.N	Name of School	Teacher Name	Father Name	Domicile	BPS	Acad. Qualifi:	BA Division	Prof. Qualifi:	DOB	D/O 1st Apptt: in Edu: Deptt:	D/O Regular Apptt: against the Post.	D/O taking Over Charge on the Present Post	D/O Taking over charge at the present post as SAT in this District.
35	GHS CHAMBA GUL	Basheer Almad	Gulab Noor	Hangu	15	MA	1st	Almia	05/01/1985	02/05/2014	02/05/2014	02/05/2014	
36	GHS CHAPRI WAZIRAN	Izat Khan	Gul War Khan	Hangu	15	BA	2nd	Almia	20/04/1984	02/05/2014	02/05/2014	02/05/2014	
37	GHS THALL	Saida Jan		Hangu	15					02/05/2014	02/05/2014	02/05/2014	
38	GMS KHATAK BANDA	Hafiz Abdul Majeed		Hangu	15					02/05/2014	02/05/2014	02/05/2014	
39	GMS BARH ABBAS KHEL	Muhammad Ibyahim		Hangu	15					02/05/2014	02/05/2014	02/05/2014	
40	GHSS TOGH SARI	Muhammad Azam	Din Badshah	Hangu	15	MA	2nd	Almia	16/12/1987	02/05/2014	02/05/2014	02/05/2014	
41	GMS QADRI BANDA	Sadiq Gul		Hangu	15					02/05/2014	02/05/2014	02/05/2014	
42	GHS KHAZINA BANDA	Hafiz Faisal Iqbal		Hangu	15					15/05/2015	15/05/2015	15/05/2015	
43	GHSS NARYAB	Muhammad Rasool		Hangu	15					14/05/2016	14/05/2016	14/05/2016	
44	GMS TURKI BANDA	Malik Hussain Muhammad Khan		Hangu	15					14/05/2016	14/05/2016	14/05/2016	
45	GMS DARBAND	Muhammad Ishtiaq		Hangu	15					11/05/2017	11/05/2017	11/05/2017	
46	GMS WAZIR ABAD	Saif Ullah Shah		Hangu	15					12/05/2017	12/05/2017	12/05/2017	
47	GHS CHAMBA GUL,	WASEEM ULLAH	HAROON KHAN	Hangu	15				12/06/1990	18/05/2020			
48	GHS TARI BANDA,	SHAHID ULLAH	RIYAT KHAN	Hangu	15				15/01/1987	19/05/2020			
49	GHS CHAPPRI WAZIRAN,	JUNAID UR REHMAN	SAEED UR REHMAN	Hangu	15				07/12/1990	18/05/2020			
50	GHS KHATTAK BANDA,	IHSAN ULLAH	ABDULLAH	Hangu	15				09/08/1991	20/05/2020			
51	GMS ANAR CHINA,	HABIB ULLAH	RAZ GUL	Hangu	15				01/01/1995	02/01/2019			
52	GMS GHALO CHINA,	MAHMOOD UL HASSAN	JALAL U DIN	Hangu	15				13/08/1987	01/01/2019			
53	GMS TORAWATTI,	IBRAR	MUHAMMAD IBRAHIM GUL	Hangu	15				02/02/1993	21/06/2021			
54	GMS MAROOFI BANDA,	MUHAMMAD KHAQAN	ABDUL SAMAD	Hangu	15				22/08/1986	01/01/2019			

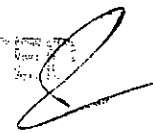
ATTESTED

24

Office Of The District Education Officer (Male) District Hangu

S.No	Name of School	Teacher Name	Father Name	Domicile	BPS	Acad: Qualifi:	BA Division	Prof: Qualifi:	DOB	D/O 1st Apptt: in Edu: Deptt:	D/O Regular Apptt: against the Post.	D/O taking Over Charge on the Present Post	D/O Taking over charge at the present post as SAT in this District.
55	GMS KHISARAI BANDA	ALIF NOOR	MUHAMMAD ANWAR	Hangu	15				18/03/1984	01/01/2019			

ATTESTED





OFFICE OF THE PRINCIPAL G.H.S.THALL (HANGU) HMMX 23

Dated: 03/10/2023

No. 1314

To

The District Education Officer
(Male) Hangu

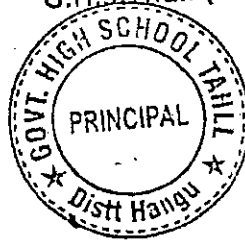
Subject:-- Correction in Seniority List

Memo,

Enclosed find here with the application of Mr. Saif Ullah Shah (A.T), BPS-15 for further necessary action please.

Principal

G.H.S.Thall (Hangu)



ATTACHED

To

District Education Officer
(Male) Hangu

26

Subject:-- Protection of Seniority From Initial Appointment Order w.e.f 02-05-2014

R/Sir,

With great veneration It is stated that I have been working against A.T Post since 12-05-2017. Although I passed the test conducted by NTS for the recruitment of the above mentioned post in 2014 and was eligible to be appointed on merit on 02-05-2014. But unfortunately I was ignored and appointed after high court decision. Due to this delay in issuance of order I have been deprived of the seniority from 02-05-2014 and placed junior to all those appointees who have been appointed before 12-05-2017. Therefore I request you to please issue orders of my seniority protection from 02-05-2014 and obliged. All the necessary documents are attached for reference.

Thanks.

Dated: 27/05/2023

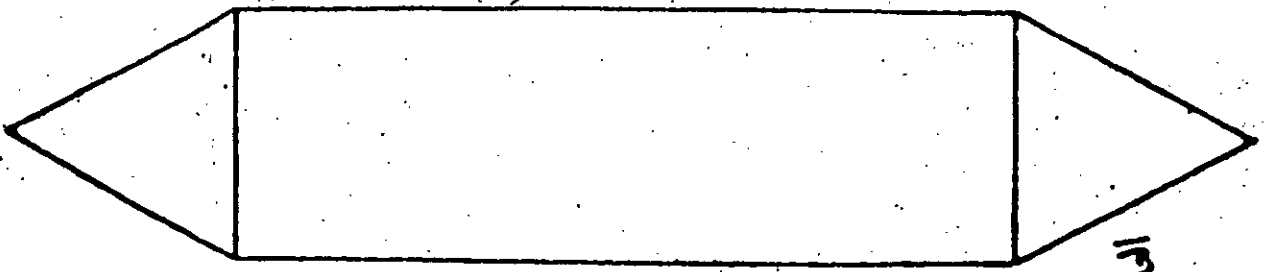


Your Sincerely,

Saif Ullah Shah S/O Masood Shah
Arabic Teacher GHS Thall (Hangu)

ATTESTED

بعد الت بسرو مسز ندر پرنل کے لیے



صفیہ اللہ شہزاد بنام گزشتہ حکم کی
معدومہ

موز
مقدم
دعوی
جزم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی در جواب وہی دیکل
کارروائی متعلقہ آن مقام لکھنؤ کے لئے محمد الحوب خان شہزادہ
مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
دیکل صاحب کو کرنے راضی نامہ و تقررات و فیصلہ برحلف دیے جواب دیں اور اقبال دعویٰ اور
بصورت دگری کرنے اجراء اور وصولی چیک و روپیہ اور مرضی دعویٰ اور درخواست ہر قسم کی تصدیق
ذرا میں پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا دگری کیفر یا اپیل کی برآمدگی اور سزا
نیز دائر کرنے اپیل لگانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی کے واسطے اور دیکل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ
پداختہ منظور و قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے ہوگا۔
انکے مستحق دیکل صاحب موصوف ہوں گے۔ نیز بقایا و خرچہ کی دہولی کرنے کا بھی اختیار ہوگا۔ اگر
کوئی تاریخ پیشی مقام دورہ پے ہو یا بعد سے باہر ہو تو دیکل صاحب پابند نہ ہوں گے۔ کہ پیروی
مذکورہ کریں۔ لہذا نکات نامہ لکھنا کہ سند رہے۔

المترجم ہا 2022-01-17
24 ص 24
جموں

د العبد
Accepted
بقام