

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 869/2019

Date of Institution:- 02.07.2019

Date of Decision:- 04.06.2021

Mr. Wilayat Khan S/O Khan Sharif Chowkidar/Class-IV Government Primary School
Mohib Banda Nowshera.

... (Appellant)

VERSUS

District Education Officer (Male) Nowshera and two other.

... (Respondents)

Fazal Shah Mohmand
Advocate

... For Appellant

Muhammad Rashid
Deputy District Attorney

... For Respondents

Mr. SALAH-UD-Din
Mr. ~~ATIQ UR REHMAN WAZIR~~

... MEMBER (J)
... MEMBER (E)

JUDGMENT: -

Mr. ATIQ UR REHMAN WAZIR: - Brief facts of the case are that the appellant was initially appointed as Chowkidar/Class-IV on 06-10-1987, who served for 32 long years unabated, but did not avail the chance of promotion to the post of Junior Clerk against the already reserved 33% of quota out of the whole strength of posts of Junior Clerk, whereas three of his colleagues found the opportunity to elevate to the next grade. Feeling aggrieved, the appellant filed Departmental Appeal dated 25-02-2019, but the respondents turned deaf ear over his clamour, hence he filed the instant appeal with prayers that the appellant may be promoted as Junior Clerk from due date with all back benefits. It is added that during the course of litigation, the appellant reached the age of superannuation and ultimately

retired on 04-08-2019, but his stance remained unaltered and now seeking relief to the extent of proforma promotion.

2. Learned counsel for the appellant has contended that the appellant was initially appointed as chowkidar/class-iv on 06-10-1987 and rendered almost thirty-two years of continuous service; that the provincial government reserved 33% quota for promotion of class-iv employees to the post of junior clerk, for which the appellant requested time and again, however instead of the appellant, the respondents promoted three of his colleagues vide order dated 14-11-2018 and finally a tentative seniority list was circulated for the first time in 2018, showing the name of the appellant at serial number 5 of the seniority list; that the respondents were required to place name of the appellant at serial number 3 of the seniority list, as seniority of class-iv employees is determined from the date of regular appointment to that post as per provisions contained in Section 8 (4) of Civil Servants Act, 1973, which is 06-10-1987 in case of the appellant, whereas such dates in respect of officials at serial number 2 and 4 are 28-10-1987 and 19-10-1987 respectively, but they were wrongly placed senior to the appellant; that the appellant filed departmental appeal, but the same was not responded to, hence he was compelled to knock at the door of this Tribunal; that the appellant has now retired on attaining the age of superannuation on 04-08-2019, however he is entitled to be granted proforma promotion with financial benefits allowed to him under the law.

3. Learned Deputy District Attorney has contended that as per seniority list, name of the appellant has been correctly mentioned at serial No. 5 of the seniority list and three of his colleagues have already been promoted; that the name of the appellant was at the top of the seniority list after promotion of his colleagues senior to him and the appellant was supposed to be promoted on availability of vacant position but in the meanwhile he retired from service; that the appellant did not

object on the seniority list timely and even his application before the departmental authority is vague in nature because he has not objected upon the promotion of his other colleagues shown senior to him in the seniority list, which means that the appellant was satisfied with his seniority position and having no objection on promotions of his colleagues; that no injustice has been done to the appellant as only three posts of junior clerks were available, upon which three of his colleagues were promoted, who were senior to him; that regarding his position in the seniority list, the learned Deputy District Attorney clarified that he was rightly placed at serial No. 5 of the seniority list, as his date of arrival to this post was 01-12-1987 and seniority is counted from the date of arrival to such post. The learned Deputy District Attorney prayed that the instant appeal being devoid of merit may be dismissed.

4. We have heard learned counsel for the parties and have perused the record.

5. Claim of the appellant to the effect of his seniority over the already promoted officials was thoroughly examined and it was found that the appellant was rightly placed at serial No. 5 of the seniority list. Three of his colleagues were promoted on availability of vacant positions being senior to him, whereas the appellant was left due to non-availability of vacant position. It was also noted that the appellant did not made any objection on the seniority list at the relevant time and even in his departmental appeal, the appellant has not objected upon the promotion of three officials placed senior to the appellant in the seniority list. on analyzing facts and circumstances of the case, we are of the considered opinion that the appellant has been dealt with in accordance with relevant law/ rules.

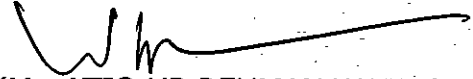
6. In view of the above discussion, the instant appeal being devoid of any force stands dismissed. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED

04.06.2021



(MR. SALAH-UD-DIN)
MEMBER (J)




(Mr. ATIQ UR REHMAN WAZIR)
MEMBER (E)

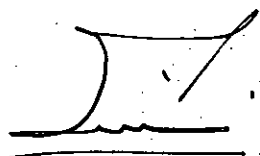
ORDER
04.06.2021

Appellant alongwith his counsel Mr. Fazal Shah Mohmand, Advocate, present. Mr. Masood Khan, ADO (Litigation) alongwith Muhammad Rasheed Deputy District Attorney for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the appeal in hand being devoid of any force stands dismissed. Parties to bear their own costs. File be consigned to the record room.

ANNOUNCED
04.06.2021


(ATIQ UR REHMAN WAZIR)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

02.03.2021


Due to COVID-19, the case is adjourned for the same on 31.05.2021 before D.B



READER

31.05.2021

Mr. Fazal Shah Mohmand, Advocate, for the appellant present. Mr. Masood Khan, ADO (Litigation) alongwith Mr. Muhammad Rasheed, Deputy District Attorney for the respondents present.

Arguments heard. To come up for order before the D.B on 04.06.2021.

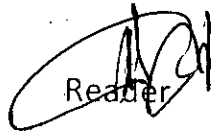

(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

18.5.2020

10/8/2020

Due to COVID19, the case is adjourned to for the same as before.


Reader

10.08.2020

Due to summer vacations case to come up for the same on 12.10.2020 before D.B.

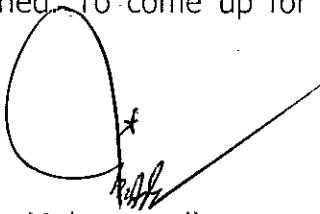

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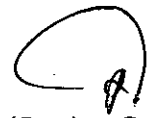
12.10.2020

Junior counsel on behalf of appellant present.

Mr. Riaz Khan Paindakheil learned Assistant Advocate General for respondents present.

Former submitted rejoinder with a request for adjournment. Adjourned. To come up for arguments on 04.12.2020 before D.B.


(Mian Muhammad)
Member (E)


(Rozina Rehman)
Member (J)

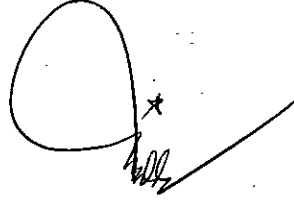
04.12.2020

Due to COVID-19 the case is adjourned for the same on 02.03.2021 before D.B.


READER

16.03.2020

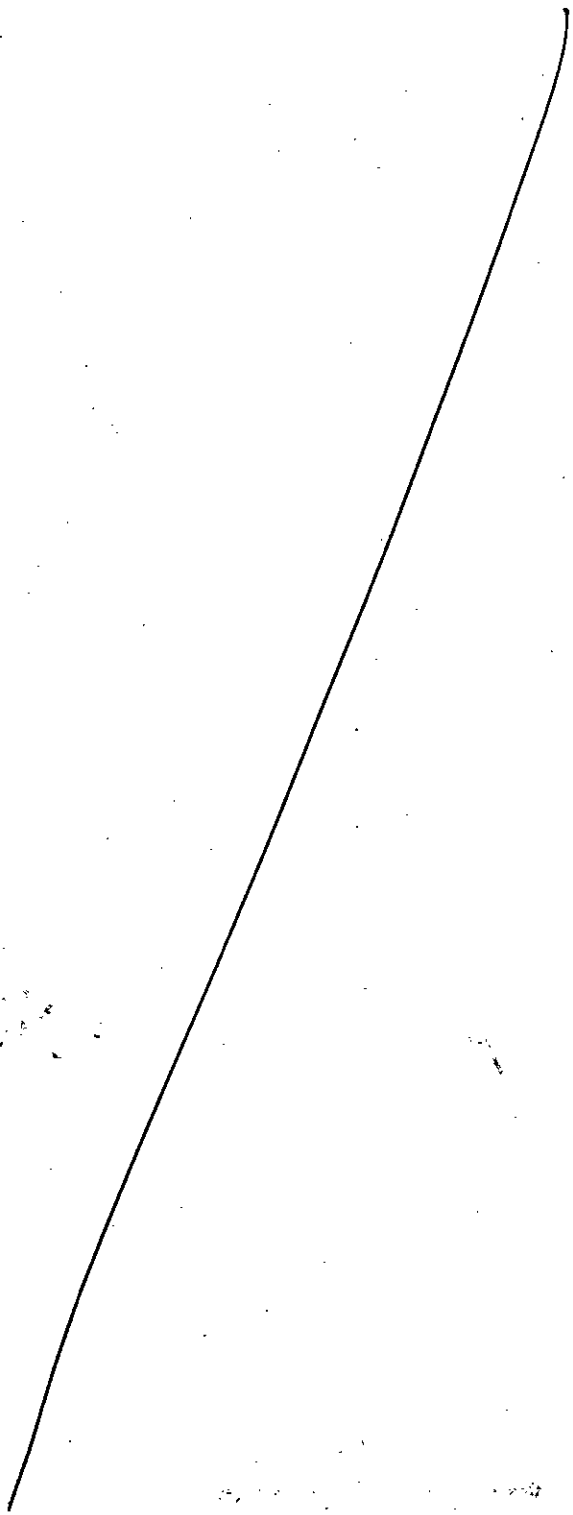
Clerk to counsel for the appellant present. Addl: AG
for respondents present. Due to general strike on the call of
Peshawar Bar Council, the instant case is adjourned. To come
up for arguments on 18.05.2020 before D.B.



(MAIN MUHAMMAD)
MEMBER



(M.AMIN KHAN KUNDI)
MEMBER



28.10.2019

Appellant present in person and Addl. AG for the respondents present.

Learned AAG requests for time to contact the respondents and furnish reply/comments. Adjourned to 22.11.2019 on which date the requisite reply/comments shall positively be furnished.

Chairman 

22.11.2019

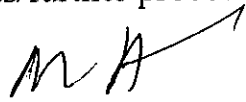
Appellant in person and Addl. AG alongwith Inayatullah, ADEO for the respondents present.

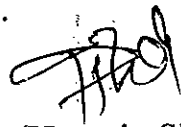
Representative of the respondents furnished written comments. Placed on record. To come up for arguments on 24.01.2020 before a D.B. The appellant may furnish rejoinder within a fortnight, if so desired.

Chairman 

24.01.2020

Due to general strike on the call of Khyber Pakhtunkhwa Bar Council learned counsel for the appellant is not available today. Mr. Riaz Paindakhel learned Assistant Advocate General for the respondents present. Adjourned to 16.03.2020 for arguments/further proceedings before D.B.


(M. Amin Khan Kundi)
Member


(Hussain Shah)
Member

09.08.2019

Counsel for the appellant present.

Contends that despite being appointed as Chowkidar (Class-IV employee) in the year 1986 the appellant was not considered for promotion as Junior Clerk. In the said regard the Provincial Government has reserved 33% quota for promotion of similarly placed Class-IV employees to the post of Junior Clerk. The departmental representation of appellant submitted on 25.02.2019 remained un-responded, hence the present appeal.

Appellant Deposited
Security & Process Fee

9/8/19

In view of submissions by learned counsel, the appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 01.10.2019 before S.B.


Chairman

01.10.2019 Appellant in person and Addl. AG alongwith Inayatullah, ADO for the respondents present.

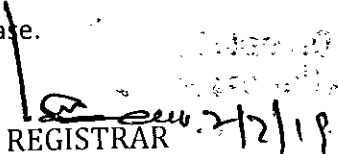

Representative of respondents seek further time. To come up for written reply/comments on 28.10.2019 before S.B.


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- 869/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/07/2019	<p>The appeal of Mr. Wilayat Khan presented today by Mr. Fazal Shah Mohmand Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 2/2/19</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>09/08/19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Service Appeal No 869/2019

Wilayat Khan.....Appellant

V E R S U S

DEO & Others.....Respondents


I N D E X

S.No	Description of documents	Annexure	Pages
1.	Service Appeal with Affidavit		1-3
2.	Copies of documents	A	4-9
3.	Copy of Application dated 27-09-2017	B	10
4.	Copy of departmental appeal and letter	C	11-12
5.	WakalatNama	D	13

Dated:-25-06-2019


Appellant

Through


Fazal Shah Mohmand
Advocate, Peshawar

- 1 -

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Service Appeal No 869/2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No: 914

Dated 02/07/2019

Wilayat Khan S/O Khan Sharif Chowkidar/Class-IV.Govt. Primary School
Mohib Banda District Nowshera.....**Appellant**

V E R S U S

1. District Education Officer (Male) Nowshera.
2. Director, Elementary and Secondary Education, Govt. of KPK Peshawar.
3. Secretary, Elementary and Secondary Education, Govt. of KPK Peshawar.....**Respondents**

APPEAL APPEAL U/S 4 OF THE KPK SERVICE TRIBUNAL ACT 1974 FOR THE PROMOTION OF THE APPELLANT AS JUNIOR CLERK AGAINST 33% RESERVED QUOTA AND FOR WHICH THE DEPARTMENTAL APPEAL OF THE APPELLANT DATED 25-02-2019 HAS NOT BEEN RESPONDED DESPITE THE LAPSE OF MORE THAN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:-

On acceptance of this appeal the appellant may kindly be ordered to be promoted as Junior Clerk in the 33% reserved quota from due date with all back benefits.

Respectfully Submitted:-

1. That the appellant is highly qualified, has passed his Intermediate in the year 2001 with PTC passed in the year 1996/1997 and Certificate/Diploma/Typing in the year 2015 and was appointed as Chowkidar/Class-IV on 06-10-1987 and since then he performed his duties with honesty and full devotion and to the entire satisfaction of his high ups. **(Copies of documents are enclosed as Annexure A).**
2. That since appointment the appellant has not been promoted despite having more than 32 years of unblemished service record while he is perfectly fit and eligible and coming up to the criteria for promotion to the post of Junior Clerk.

Filed to-day

Registrar

2/7/19

3. That even the Provincial Govt. has reserved 33% quota for the promotion of Class-IV employees to the post of Junior Clerks but respondents have turned deaf ear and never bothered to observe the same nor ever maintained any Seniority list for the purpose.
4. That the appellant even requested for his posting on the post of PTC/PST vide Application dated 27-09-2017 but of no fruits. **(Copy of Application dated 27-09-2017 is enclosed as Annexure B).**
5. That in the year 2018 respondents for the first time, promoted only three Class-IV Employees to the post of Junior Clerk.
6. That the appellant filed departmental appeal for his promotion as Junior Clerk on 25-02-2019 which was duly forwarded vide letter dated 12-03-2019 however the same has not been responded so far despite the lapse of more than the statutory period of ninety days. **(Copy of departmental appeal & letters are enclosed as Annexure C).**
7. That the this action of the respondents of not promoting the appellant as Junior Clerk in the quota reserved for the promotion of Class-IV employees, is against the law, facts and principles of justice on grounds inter-alia as follows:-

GROUND:-

- A. That the omissions and commissions of the respondents are illegal, unlawful without lawful authority and void ab initio.
- B. That mandatory provisions of law have been violated by the respondents and the appellant has not been treated according to law and rules and more particularly rules governing the subject.
- C. That the appellant is perfectly fit and eligible and coming up to the criteria set forth in law and rules but malafidely has not been promoted.
- D. That even as per the rules/law the appellant is entitled having more than the required length of service besides qualification for promotion as Junior Clerk.


- E. That there is no omission or commission on part of the appellant and he could not be punished for the fault of others.
- F. That the respondents have promoted only three Class-IV employees in the reserved quota in November 2018 and no one else during the last so many decades has been promoted in the reserved quota.
- G. That respondents have appointed hundreds of Junior Clerks in the District but never observed such quota resulting in deprivation of the appellant from his due right of promotion as Junior Clerk.
- H. That the appellant has about 32 years of service with unblemished service record.

It is therefore prayed that appeal of the appellant may kindly be accepted as prayed for.

Any other relief deemed appropriate in the circumstances of the case and not specifically asked for may also be granted in favor of the appellant.

Dated:-25-06-2019


Appellant

Through 
Fazal Shah Mohmand
Advocate Peshawar.

AFFIDAVIT

I, Wilayat Khan S/O Khan Sharif Chowkidar/Class-IV. Govt. Primary School Mohib Banda District Nowshera, do hereby solemnly affirm and declare on oath that the contents of this **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.


DEPONENT

4- "A"

S. No 0750216

Roll No. 77558



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan

Secondary School Certificate Examination

SESSION 1990 (ANNUAL)

THIS IS TO CERTIFY THAT Wilayat Khan

Son/Daughter of Khan Sharif

and a resident of Nowshera District

has passed the Secondary School Certificate Examination of the Board of Intermediate & Secondary Education, Peshawar held in March 1990 as a Private Candidate. He/She obtained 370 Marks out of 850 and has been placed in Grade D Representing Fair

The Candidate passed in the following subjects:

- 1. English
- 2. Urdu
- 3. Islamiyat
- 4. Pakistan Studies
- 5. Gen: Maths
- 6. Gen: Science
- 7. Isl: Studies
- 8. Pashto

Date of birth according to admission form is Fifth August,

one thousand nine hundred and Fifty Nine (05-8-1959)

[Signature]
Asstt: Secretary
11th August 1990

[Signature]
Principal
[Signature]
Secretary

This certificate is issued without alteration or erasure

PRINCIPAL
Peshawar

C.S. No. 100753

Roll No. 14199

Group. Humanities

-5-

Peshawar N.W.F.P. Pakistan
INTERMEDIATE EXAMINATIONS
SESSION 2001-SUPPLEMENTARY

Handwritten signature

This is to certify that Wilayat Khan Son of Khan Sharif
and a resident of Nowshera District Registered No. 735-2/E-5
has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Peshawar
held in Oct/Nov: 2001 as a Private Candidate. He obtained 462 Marks out of 1100
and has been placed in Grade D Representing Fair. He has been awarded Grade - on the
basis of internal assessment by the institution concerned. The Examination was taken in part.

Handwritten signature
Asst. Secy

Handwritten signature
Secretary
FAYAZ KHAN
S.S.T. (G)
G.H.S.S. Pir Pindi (M.S.)

-6-

**REGIONAL CAMPUS
ALLAMA IQBAL OPEN UNIVERSITY
PESHAWAR.**

No. AIOU/Reg; Pesh; /Certif/

Dated 12.8.92

TO WHOM IT MAY CONCERN

Certified that Mr/Ms Wilayat Khan

S/o, Khaem Sharif Roll No. C6438085

has successfully completed/passed the required courses of C.T / PTC

Programme. Detail of the courses is as under:-

COURSE CODE NO.	MARKS OBTAIN	%	GRADE
613	41		E
614	64		B
615	58		B
616	56		B
617	44		E
618	49		E
619	47		C
620	47		B
611	60		
	<u>466</u>	<u>900</u>	

Proper certificate will be issued to the student in due course of time by the Controller of Examinations Allama Iqbal Open University Islamabad

N.B: This certificate has been issued as authorised by the Controller of Examinations Allama Iqbal Open University, Islamabad.

Khaem Sharif
Prepared and checked by

FAYAZ KHAN
S.S.T (G)
G.H.S.S Pir Piai (NSR)

ATTENDED
[Signature]
Regional Director
Allama Iqbal Open University
Peshawar

رجسٹریشن نمبر
رول نمبر

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ
-7-

71205

نمبر شمار

علامہ اقبال اوپن یونیورسٹی اسلام آباد



ATTA
UNIVERSITY

سیٹر خزاں 98ء

خان شریف

ولایت خاں

تصدیق کی جاتی ہے کہ

کوڈ	کورس	سابقہ / صوبہ	مرحلہ	نے	پروفیسر ٹیچر ٹریننگ	مندر جو ذیل کورسز پاس کر کے حاصل کیا ہے۔
411	ورکشاپ و تدریسی مشق	30	کورس	416	تدریس اردو	مندر جو ذیل کورسز پاس کر کے حاصل کیا ہے۔
413	اصولِ تعلیم	41	کورس	418	تدریس ریاضی	حاصل کردہ نمبرز
414	تعلیمی نفسیات	64	کورس	419	تدریس سائنس و جسمانی تعلیم	44
415	تنظیم مدرسہ	58	کورس	420	تدریس اسلامیات و معاشرتی علوم	49
416	سکول کمیونٹی اور عملی فنون	98	کورس			47
						188/SCC

گرید میں کامیابی حاصل کی۔

فیصد نمبر اور

طالب علم نے مجموعی طور پر پی ٹی سی پروگرام میں

محمد حرم علی
کنٹرولر امتحانات

دین سندھ خیر نس نشان و بیچے کے جاری کی گئی

اسلام آباد
مورخہ

ATTA
UNIVERSITY
ISLAMABAD
PUNJAB (INDIA)

-8-



GLOBAL COMPUTER & ENGLISH LANGUAGE ACADEMY

Government Recognized



NOWSHERA CANTT.

CERTIFICATE / DIPLOMA

Registration No. 0392

Date of Issue 21-09-2015

Roll No. 2092

S. No. 1096

ATTESTED

Mr./Miss/Mrs. W. I. Q. Khan *Per/D. of* W. I. Q. Khan

has successfully completed 06 Month *Diploma/Certificate in* Computer English Language
from 07-04-2015 to 16-09-2015 in the following courses:

- | | | |
|----------|----------|----------|
| a) _____ | b) _____ | c) _____ |
| d) _____ | e) _____ | f) _____ |
| g) _____ | h) _____ | i) _____ |
| j) _____ | k) _____ | l) _____ |

Signed by
Academic Co-ordinator
Global Academy NSR

Academic Co-ordinator

Signed by
Administrator

Administrator

-9- 10/10/87

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (MALE) NOWSHERA.
APPOINTMENT ORDER OF CHOWKIDAR.

Mr. Milrajat Khan S/O Khan Sharif

Residence of P.M. Iskari

candidate is hereby appointed as Chowkidar on Rs:600/-pm. plus usual allowance as admissible under the rules with effect from the date of taking over charge at S.P. B. W. I. Sharif against newly created post of Chowkidar, under the following terms and conditions:-

CONDITIONS.

1. Charge reports should be submitted to all concerned.
2. NO TA/DA is allowed being first appointment.
3. No joining time is allowed what is absolutely necessary for transit.
4. The appointment is purely made on temporary basis and subject to the termination at any reason or prior notice. In case he wishes to leave the department he should have to submit one month's prior notice.
5. He should produce his health and age certificate from the Civil Surgeon, within 10 days of reporting arrival, duty as required under the rules (FR.10.SR.4).
6. In case the candidate fails to take over charge within 10 days from the date of issue of this letter his appointment will stand cancelled automatically.
7. The candidate should not be handed over charge if his age is not between 18-45 years.
8. The pay scale and service rules would be subject to the revision in accordance with the orders to be passed by the Govt; of NWFP from time to time.
9. He will produce ~~copies~~ copies of relevant documents including domicile and identity card to the SDO(M) Nowshera, at the time of taking over charge.
10. He will be dealt with under M&D Rules, if he violate Govt; rules and regulations.

Jameel Sharif
(JANAB SHARIF)
Sub Divl; Education Officer (M)
NOWSHERA.

Enlist; No. 2523-2758

Class-IV: Appt; dated Nowshera the 0.10. /1987.
Copy for information to the:-

1. The District Education Officer (Male) Nowshera.
2. Member provincial Assembly concerned.
3. The Head Teacher; GPS STU W. S. S. (Tehsil Nowshera).
4. A.S.D.F.O. (Male) Nowshera, Circle.
5. Pay clerk.
6. Head Clerk.

Jameel Sharif
SUB DIVISIONAL EDUCATION OFFICER,
(MALE) NOWSHERA.

Zt...

محکمہ تعلیم غلہ ٹو ٹو
غور جناب ڈی. ای. او صاحب
درخواست دربارہ تعلیمات کے آئی اے

(جوئینر ملریکا)

جانب الی

To
ADD
(Establish) Secret
Examine the
request as
per policy

حوزہ تعلیمات کے بارے میں 1987
پولیسٹ پر ڈیوٹی سرانجام دے رہا ہوں
جو کہ میں نے سال 1997 میں ڈیوٹی
اور سال 2002 میں F.A کا امتحان پاس کیا ہے
موردہ تعلیمات کے سرٹیفکیٹ درخواست دہانہ کیساتھ
حاضر کیا ہے۔ مزید تعلیمات شریب اور باغ، آگرہ
اور محکمہ تعلیمات کے متعلقہ ملازمین سے
مذاکرہ کے بعد حاصل کی، غور میں تعلیمات کے بارے میں
مزید نوٹس کے ساتھ درخواست دہانہ کیساتھ
کہ مزید تعلیمات تعلیمات دہانہ کیساتھ
میری سرکاری ہوتی ہے

27/09/2017

تعلیمات میں تعلیمات
تعلیمات میں تعلیمات

19/9/2017

Dairy No 368

27-9-2017

3329011539

✓

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گورنمنٹ ڈسٹرکٹ ایجنسی ایئر سیکورٹی ایجنسی
حوالہ: درخواست برائے ایئر سیکورٹی

جناب عالی - تم فروری خودکشہ نرملی پول فوج بازوہ میں فلاس فور
پوسٹ پر ڈیوٹی سرانجام دے رہے ہیں۔

(2018-11-10) میں فلاس فور کے سنیار لیسٹ میں صرف تین (3)

مکروں فوروں کا پیموش ہو گیا۔ سنیار لیسٹ میں حیرا باؤاں

کہ فون FA پاس اور ڈیٹی سٹریٹنگ کر رکھی ہے

1987 سے لیکر 2018 تک سنیار لیسٹ کا نام و نشان نہ تھا۔
اور فوجی جو سنیار لیسٹ کا پیموش یعنی نہ ملا۔ اور ہمارا حق تلفی ہو گیا ہے
اور نا انصافی ہے۔ اور اس فلاس فور اپنے حق سے محروم ہو کر
ڈیپارٹ ہو جاتے ہیں۔

سراڑگرم کو جو سنیار لیسٹ کے پوسٹ پر تعینات مناصبت ملا

فرمادیں۔ اور انصاف دلائیں۔
ہم نے مہر دیا کہ اس فوجی کو حال ہی میں
ناصیبت دغا کو رہو گا

تمام اسناد درخواست کے ساتھ منسلک ہیں

آپ کا فرمان سزا ہو گیا اور ولایت
العدلیہ
نیو نیو سٹیٹ

25/12/2019 ✓

03328944573

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-12-

Directorate of Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.
No _____ F.No. 391/A-20/C-IV/Nowshera Vol-4
Dated Peshawar the 21/3/2019

To

The District Education Officer
(Male) Nowshera

Subject: **APPEAL :-**

Memo.

I am directed to refer to the subject noted above and to enclose herewith a copy of application along with its enclosures in r/o of Mr. Wilayat Khan Chowkidar GPS Mohib Banda District Nowshera for further necessary action under the rules/policy.

Assistant Director (Admn)
Directorate of E&SE K.P. Peshawar

Endst. No. 303

Copy forwarded to the: -

1. Mr. Wilayat Khan Chowkidar GPS Mohib Banda District Nowshera.
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

Assistant Director (Admn)
Directorate of E&SE K.P. Peshawar

DNO = 137

21-3-2019



D. New folder Minnowar Wilayat Khan Chowkidar Appeal etc.

ATTENDED

WAKALAT NAMA

-13-

IN THE COURT OF KP Service Tribunal Peshawar

Wajidat Khan

VERSUS

DGo in others

Accused/
Petitioner/
Appellant/
Plaintiff.

Respondent/
Defendant/
Complainant

FIR No. _____ Dated: _____ Police Station: _____

Charge U/s _____

KNOW ALL to whom these presents shall come that I the undersigned appoint:

Fazal Shab Mohmand Advocate Supreme Court of Pakistan,
(herein after called the advocate) to be the Advocate for the Appellant in the above-mentioned case, to do all the following acts, deeds and things or any of them, that is to say:

- 1) To act and plead in the above mentioned case in this court or any other Court in which the same may be tried or heard in the first instance or in appeal or review or execution or in any other stage of its progress until its final decision.
- 2) To sign, verify and present pleadings, appeals, cross - objections, petitions for execution, review, revision, withdrawal, compromise or other petition or affidavits or other documents as shall be deemed necessary or advisable for the prosecution of said case in all its stages.
- 3) To withdraw or compromise in the said case or submit to arbitration any difference or dispute, that shall arise touching or in any manner relating to the said case.
- 4) To receive money and grant receipts therefore and to do all other acts and things which may be necessary to be done for the progress and the course of the prosecution of the said case.
- 5) To engage any other Legal practitioner authorizing him to exercise the power and authorities hereby conferred on the Advocate whenever he may think fit to do so.

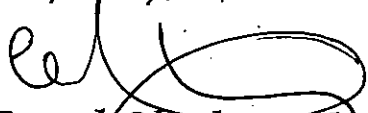
AND I hereby agree to ratify whatever the Advocate or his substitute shall do in the promises.

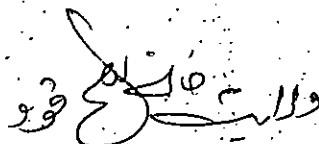
AND I hereby agree not to hold the Advocate or its substitute responsible for the result of the said case and in consequence of his absence from the court when the said case is called up for hearing

AND I hereby that in the event of the whole or any part of the fee agreed by me to be paid to the Advocate remaining unpaid, He shall be entitled to withdraw from the prosecution of the said case until the same is paid.

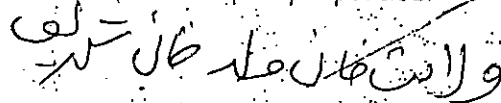
IN WITNESS WHEREOF I hereunto set my hand to these presents the contents of which have been explained to and understood by me, this _____ day of _____ 201_

Accepted By


Fazal Shab Mohmand,
Advocate Supreme Court of Pakistan



Signature / thumb impression
of party / parties.



17201-2111794-5

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Service Appeal NO. 869/ 2019

Willayat Khan Appellant

VERSUS

District Education Officer and others Respondents

Written comments on behalf of respondents are as under.

Respectfully Sheweth

Preliminary Objections

1. That the appellant has no cause of action to file the instant appeal.
2. That this Honorable Tribunal has got no jurisdiction to entertain the present appeal.
3. The present appeal is bad for miss-joinder and non-joinder of necessary parties.
4. That the appellant is estopped by his own conduct, by deed and by law to file the instant appeal.
5. That the instant appeal is barred by law.
6. That the appeal is time barred.
7. The appellant has no locus standi to file the instant appeal.

Factual Objections:-

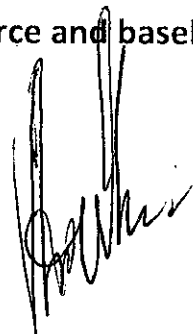
1. Pertains to record.
2. Incorrect. The appellant is at S.No. 5 of the seniority list of the class-IV employees. The candidates / officials at S.No. 1, 2 & 4 has already been promoted to junior clerk post under 33% quota (Promotion order is annexure A). At present the appellant is on the top of the seniority list and shall be considered for promotion on his turn/next time.
3. Incorrect. The respondent has observed 33% quota and 03 class-iv employees has already been promoted to junior clerk post under 33% quota. The appellant was at S.No. 5 of the seniority list (seniority list is annexure B) and was not in the promotion zone, therefore, was not consider for promotion.
4. Incorrect. There is no rules/policy for promotion of class-iv employees to PST post.
5. Incorrect. 03 class-iv were rightly promoted on the ratio of 33% reserved quota.
6. Incorrect. The appellant was not in seniority/promotion zone, therefore, was not considered for promotion.
7. Incorrect. The action of the respondent is according to law, rules and policy.

GROUNDS

- A. Incorrect. The action of the respondent is according to law rules and policy.
- B. Incorrect.
- C. Incorrect. The appellant was not in seniority/promotion zone, therefore, was not considered for promotion.
- D. Incorrect. In the light of the rules seniority cum fitness, the appellant was not in the promotion zone.
- E. Incorrect. As explained in the above paras.
- F. Incorrect. Ten candidates has been appointed on the initial recruitment and 03 class-iv has rightly promoted to junior clerk (Annexure C).
- G. Incorrect. As explained in the above paras.

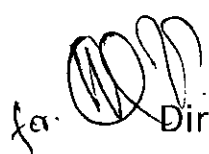
It is, therefore, requested that the present service appeal is being meritless, devoid of force and baseless, may kindly be dismissed.

Respondent No. 1



District Education Officer
(Male) Nowshera

Respondent No. 2



for Director
E & S Education Khyber Pakhtunkhwa
Peshawar

Respondent No. 3



Secretary E & S E
Khyber Pakhtunkhwa Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal NO. 869/ 2019

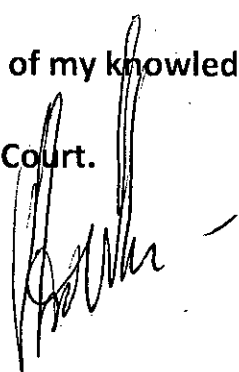
Willayat Khan Appellant

VERSUS

District Education Officer and others Respondents

AFFIDAVIT

I Attaullah Mena Khel District Education Officer (Male) Nowshera do solemnly affirm and declared on oath that the contents of the para wise comments on behalf of respondents are true and correct to the best of my knowledge and that nothing has been concealed from this Honorable Court.



DEPONENT

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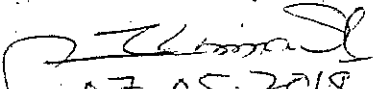
REVISED TENTATIVE SEN OR TV LIS OF SSC PASSED CLASS IV OF BISE EDUCATION (MALE) NOWSHERA FOR PROMOTION OF 33% QUOTA TO JUNIOR CLERK.

Qualificat: Date of Birth, Date of Ist, Passing SSC, Register, Remarks

Sl. No.	Name & Designation	Father's Name	Qualificat	Date of Birth	Date of Ist	Passing SSC	Register	Remarks
1	Rahat Shah Lab: Attendance	Bukhar Shah	SSC	14-09-1966	15-09-1984	11-12-1993	15-09-1984	370/852
2	Munawar Shah Chowkidar	Rasool Shah	SSC	10-10-1961	10-05-1986	15-08-1989	15-05-1986	370/850
3	Khalid Khan Naib Qasid	Hassan Khan	SSC	01-01-1968	19-10-1987	09-09-85	19-10-87	317/850
4	Akhtar Munair Chowkidar	Adam Khan	SSC	17-04-1972	19-10-1987	12-12-1991	19-10-1987	347/851
5	Wilayat Khan (Chowkidar)	Khan Sharif	FA (PTC)	05-08-1959	01-12-1987	3-03-1990	01-12-1987	370/855
6	Amresh Khan Lab: attendant	Munammad Amin	SSC	10-02-1966	14-02-1988	31-12-1983	14-02-1988	436/85
7	Niaz Muhammad Chowkidar	Qadir Shah	SSC	28-09-1970	20-09-1988	28-07-1995	20-09-1988	335/81
8	Saeed Ullan Chowkidar	Mionabat Shah	SSC	10-04-1965	21-09-1988	24-01-1990	21-09-1988	332/8
9	Ikram ul Haq Chowkidar	Yaqoob Khan	SSC	00-00-1968	15-10-1988	31-03-1988	15-10-1988	33
10	Rang Wali shah Chowkidar	Abdul Ghafoor Shah	SSC	12-03-1967	06-11-1988	31-03-1987	06-11-1988	359/8
11	Muhammed Ismail Lab: attendant	Sher Bahadar	SSC	14-05-1964	09-09-1989	30-12-1993	09-09-1989	378/8
12	Mehrab Gul Naib Qasid	Ziaret Gul	SSC	10-04-1972	10-10-1989	31-12-1990	10-10-1989	418/8
13	Mir Fider Chowkidar	Sacdar Gul	SSC	12-09-1973	20-12-1989	05-01-1991	20-12-1989	375/8
14	Haider Ali Shah Chowkidar	Muzammil shah	SSC	14-08-1969	02-05-1990	28-07-1995	02-05-1990	612/100
15	Syed zahir shah Naib Qasid	Syed Usman shah	FA	02-11-1972	01-07-1990	1990	01-07-1990	410/8
16	Saman Gul Lab: Atti	Fardid Gul	MA Sec	05-03-1969	15-10-1990	00-00-1988	15-10-1990	375/8
17	Fazal Ahmad shah Chowkidar	Marcos Smer	FA PTC	04-02-1959	05-11-1990	30-08-1990	05-11-1990	612/100
18	Mir Azam Khan Naib Qasid	Saeed Mir Khan	SSC	08-11-1959	17-12-90	3-2-90	01-01-1991	410/8
19	Vir Azam Khan Naib Qasid	Saeed Mir Khan	SSC	08-11-1959	17-12-90	3-2-90	01-01-1991	370

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✓ 21	GRC AC Centre	Riaz Amin Chowkidar ✓	Hazrat Umar ✓	SSC	19-05-1970 ✓	18-05-1991 ✓	31-12-1990	18-05-1991	D.O. kalyan ehar	3005846208 ✓	376/850
✓ 22	GSAAHS Dag Behsud	Zafar Iqbal Lab: Attendant	Musharif Khan	SSC	20-10-1973	21-10-1991 ✓	07-08-1993	21-10-1991	18.5.91		429/85
X 23	GHS Manahi	Sardar Ali Naib Qasid	Hashim Khan	SSC	01.08.75/SSC cat.	20-02-1992	15-07-1984	20-02-1992	21.10.91	3449135285	415/850
✓ 24	GHS Multa Killi	Jan Alam Sweeper ✓	Fazli Elahi ✓	F.A	15-03-1964 ✓	31-05-1992 ✓	16-01-1980 ✓	31-05-1992	01.06.77	3118321537	


 07.05.2018
 Jinnat Gul
 Principal
 GHS Bara Banda



11

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

(Office Phone#0923-9220228, Fax#0923-9220228)

NOTIFICATION/APPOINTMENT

Consequent upon the recommendation of the Departmental Selection Committee appointment of the following candidates are hereby ordered against the vacant Junior Clerks posts in BPS-11 (Pay Band 7-10-32710) @ Rs.10510/- fixed plus usual allowances as admissible under the rules on Adhoc basis on contract under the existing policy of the provincial Government, in non-Teaching Cadre on the terms & conditions given below in the interest of public service with effect from the date of their taking over charge.

OPEN MERIT

S. No.	RIS R.No.	Name of candidate	Father's Name	Address	Typing Speed WPM	Score	Place of Posting
01	572700929	Muhammad Usman (M.Com/DIT)	Ajmal Hussain	Moh; Shamlat Baba Jee Kili Khesghi Bala Nowshera	27.75	156.44	GHS Bala Banda
02	60270070	Muhammad Yasir (BBA (Hon)/ DIT)	Zafran Ud Din	Near Hera Public School Khesghi Bala P.O Khesghi Payan NSR	33.33	129.61	GHS Bala Abad
03	602700497	Aurang Zeb (MBA (Finan)/DIT)	Gul Dad Khan	Vill; Ali Baig P.O Tarn Jabba NSR	35.61	126.23	GHS Tarn Jabba Taza Din
04	572700342	Shafiqullah (B.A)	Noor Ul Samad	Vill; Azakhel Bala (Dawood Zai) Nowshera	28.75	122.62	GHS Zaira Khana
05	572700593	Muhammad Irfan (M.Sc (Comp; Science)	Muhammad Siddique	Vill; Khat Kili Moh; Behnat Abad NSR	33.85	119.89	DEO (Male) Office Nowshera
06	572700900	Muhammad Irfan Mandori (B.A/DIT)	Mamraiz Khan	Moh; Mandori Vill; Khesghi Bala P.O. Khesghi Payan.	26.75	119.19	GHS Chahara
07	602701099	Jawad Azeem (B.A/DIT)	Azeem Khan	Moh; Gari Zardad Vill; & P&O Akbar Pura Nowshera.	42.07	118.98	SDEO (Male) Tehsil Nowshera
08	572700753	Hazrat Hussain (B.A)	Shah Hussain	Moh; Hofi Khel Nowshera Kalan	41.91	117.16	GHS Jabbi
09	572700105	Sifatullah (B.A)	Farzand Ali	Moh. Battakzai Khesghi Bala P.O Khesghi Payan	30.5	117.04	GHS Duncraig
10	572700553	Arshad Khan. (M.A (IS)	Hidayat Khan	Vill; Banda Sheikh Ismail Nowshera.	27	115.99	GHS Bala Banda

TERMS & CONDITIONS

1. Appointments are purely on temporary & contract basis initially for one year.
2. NO TA/DA etc. is allowed for joining their posts.
3. Charge reports should be submitted to all concerned in duplicate.
4. They shall be governed by such rules and regulations as may be issued from time to time by the Govt.
5. Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rules from time to time.
6. They should not be handed over charge if exceed, 35 years or below 18 years of age. Any grievance case may be submitted to competent authority.


7. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO (M) Nowshera, and if anyone found to have produced bogus Certificate/Degree/Testimonials shall be reported to the law enforcing agencies for further action.
8. Their services are liable to be termination on one month's notice from either side. In case of resignation without prior notice his one-month pay/allowances shall be forfeited in favour of the Government.
9. The Pay of any appointee shall not be drawn /released by the DAO/DDO concerned until and unless a certificate to the effect by DEO (M) Nowshera is issued that their/his certificates/degrees/transcripts have been verified.
10. They should join their post within 30 days of the issuance of this notification. In case of failure to join the post within 30 days of the issuance of this notification, his appointment shall expire automatically and no subsequent appeal etc. shall be entertained.
11. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
12. Before handing over charge once again their documents must be checked and if they do not possess the required relevant qualifications as per rules/policy or they do not belong to the district, where they have been appointed in, they shall not be handed over charge of the post.

(Fayaz Hussain)
District Education Officer (M)
Nowshera

Enclt. No. 327c-78 / DEO (M)/NSR/ Estab: Secy/Aptt; of J/Clerk/NTS/2016/Adhoc/ Dated Nowshera the
31 / 12 / 2016.

Copy forwarded for information and necessary action to the: -

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commissioner Nowshera
3. District Accounts Officer Nowshera
4. Deputy District Education Officer (M) Nowshera
5. SDEO (M) Tehsil Nowshera
6. Principal/Headmasters schools concerned.
7. District Monitoring Officer (IMU) Nowshera.
8. Assistant Programmer (DEMIS) Local Office
9. Appointees Concerned.
10. Master File


District Education Officer (M)
Nowshera
31/12/16



OFFICE OF THE
DISTRICT EDUCATION OFFICER, (MALE),
NOWSHERA

PHONE # 0923-9220228 , FAX # 0923-9220228

NOTIFICATION

Consequent upon the recommendations of the Departmental Promotion committee meeting held on 26-10-2018, and in Compliance with the order / direction of the Khyber Pakhtunkhwa Service Tribunal in service appeal No.304/2014(Execution Petition No.43/2018) dated 25-09-2018, and in pursuance of S.No: 09 of the notification issued by the Govt: of Khyber Pakhtunkhwa (E & S) Education department Notification No. SO (PE) 14-10/SSRC/Ministerial Staff/ 2013 dated: 28-01-2013, the following Class-IV employees are hereby promoted to the post of Junior Clerk BPS-11 (12570-880-38970) plus usual allowances under the rules on regular basis under the existing policy of the Provincial Government, under 33% quota and posted at the schools noted-against their names with immediate effect subject to the terms and conditions given below:-

S#	S.L No:	Name & Designation	Father's Name	Present Place of duty.	Posted as Junior Clerk B-11
01	01	Mr. Rahat Shah Lab: Attendant.	Mr. Bukhari Shah	GHSS Akbar Pura	GHSS, Pirnai Nowshera.
02	02	Mr. Munawar Shah / Chowkidar	Rasool Shah	GHS Aza Khel Bala	GHSS, Khair Abad Nowshera.
03	03	Mr. Akhtar Munair / Chowkidar	Adam Khan	GPS Dag Rehsud	GHSS, Palosi Payan Nowshera.

TERMS & CONDITIONS:

1. They shall be on probation for a period of one year extendable for another one year.
2. They should join their post within (15), fifteen days, of the issuance of this Notification.
3. They shall be governed by such rules and regulations may be issued time to time by the Government.
4. Charge report should be submitted to all concerned.
5. The DDO concerned will verify their documents before release of their pay; if documents were found bogus they will be terminated.
6. Necessary entries should be made in his /their service Book to the effect that if the said promotion was withdrawn due to the representation / appeal by any other senior eligible Candidate/or by the court, recovery of the monetary benefit, taken during the said period, will be recovered from the officials concerned.
7. No. TA/DA is allowed for joining their duty.
8. They will give an under taking to be recorded in their Service Books to the effect that if any over payment is made to him in the light of this order will be recovered and if he is wrongly promoted he will be reversed.

(FAYAZ HUSSAIN)

District Education Officer, (Male)
Nowshera

Endstt: No. 13865-74 /DEO (M) NSR/EA-S/Prom: of Class-IV to J/C/2018. Dated Nowshera the 14/11/2018

- Copy of the above is forwarded for information and necessary action to the:
1. Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar in Service Appeal No.304/2014.
 2. PS to Secretary, Elementary & Secondary Education Department, Khyber Pakhtunkhwa Peshawar.
 3. Director, Elementary & Secondary Education Department, Khyber Pakhtunkhwa Peshawar.
 4. Section Officer (Lit: II), Elementary & Secondary Education Department, Khyber Pakhtunkhwa Peshawar.
 5. Deputy Solicitor, Law Department, Khyber Pakhtunkhwa Peshawar.
 6. Senior District Accounts Officer, Nowshera.
 7. Principal/Head Master concerned.
 8. Assistant District Education Officer, Estt: Secondary branch, Local Office.
 9. Superintendent / Dealing Assistant, Estt: Secondary Branch, Local Office.
 10. Official concerned.

District Education Officer, (Male)
Nowshera.

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

Service Appeal No 869/2019

Wilayat Khan.....**Appellant.**

V E R S U S

DEO & Others.....**Respondents**

REPLICATION ON BEHALF OF THE APPELLANT.

REPLY TO PRELIMINARY OBJECTIONS.

All the objections raised by the respondents are incorrect and as such denied. The appellant has got a valid cause of action and locus standi to bring the present appeal, which is not barred by Law and in which all necessary parties have been impleaded. The appellant is not estopped by his conduct to file instant appeal, which is well within time and this Honorable Tribunal has got jurisdiction to entertain and adjudicate upon the matter.

REPLY TO FACTS/GROUNDS:

Comments of the respondents are full of contradictions, rather amounts to admissions and are based on malafide. Respondents have failed to show that the version of the appellant is incorrect. Even respondents have failed to show and substantiate their version referring to any law and rules. In the circumstances the appellant has been deprived of his rights without any omission or commission on his part and he has been deprived of his rights guaranteed by the Constitution and law of the land. Respondents have admitted that the appellant is perfectly fit and eligible and coming up to the criteria, thus deprived of his right for no fault on his part. Respondents have also admitted that only three class-VI employees have been promoted in Quota denying such rights to others including appellant for no omission or commission.

In the circumstances the appellant has not been treated according to law and rules being his fundamental right. The impugned order is in total disregard of the law and rules and as such alien to law which cannot be maintained and liable to be struck down.

It is therefore prayed that appeal of the appellant may kindly be accepted as prayed for.

Dated:-12 -10-2020.

[Signature]
Appellant

Through

[Signature]
Fazal Shah Mohmand

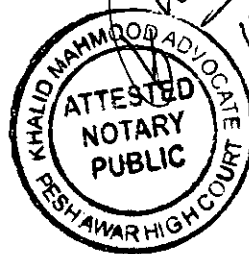
Advocate,

Supreme Court of Pakistan.

AFFIDAVIT

I, Wilayat Khan, S/O Khan Sharif, Chowkidar/Class-IV. Govt. Primary School, Mohib banda, District Nowshera, (the appellant), do hereby solemnly affirm and declare on oath that the contents of this **Replication** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

[Signature]
DEPONENT





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

(OFFICE PHONE #0923-9220228, FAX#0923-9220278)

RETIREMENT ORDER

Under the provision of Government of Khyber Pakhtunkhwa Finance Department Letter (SR IV) Vol. II dated 24-08-1985; Sanction is hereby accorded to the grant of measurement of leave Retirement given below in respect of the following official

Sr	Name of Official	DDO Retirement	DDO Birth	DDO Appointment	Measurement of L.P.L	Total Service Length Y M D	Total Age Y M D	Remarks
01	Mr. Wilayat Khan Chowkidar GPS Mohib Banda P No. 00133372	04-08-2019	05-08-1959	01-12-1987	365 Days on full pay	11-08-01	59 11 29	Retiree leaves service on a Mature

- Note: - 1. Necessary entry to this effect should be made in his service book accordingly
 2. The outstanding amount Bank loan (if any Govt. loan may be deducted from the concerned pensioner's account Please.

GATTAULI ALIKHAN
District Education Officer (Male)
Nowshera

Encl: No. 5670-72 DDO (M) NSR I-Pry File No. Vol. II Retirement of CIVT teachers District Nowshera 07/08/19

Copy of the above is forwarded for information for further necessary action to the

1. Senior District Account Officer, Nowshera.
2. Sub Divisional Education Officer (Male) Pabbi vide letter No: S020 dated 29/11/2019
DDO (M) local Office Dairy No, 570 date 09/12/2019.
3. ADO Circle concerned

District Education Officer (Male)
Nowshera