

FORM OF ORDER SHEET

284/2024

Order sheet for further proceedings with signature of judge
and date.

3

29/02/2024

The appeal of Mr. Sakhi Marjan resubmitted today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at 10:00 AM on 20.02.2024. Parcha Peshi is given to counsel for the appellant.

By the order of Chairman



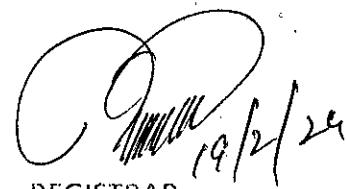
REGISTRAR

The appeal of Mr. Sakhi Marjan received today i.e on 16.02.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondents no. 2 is un necessary/improper party, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondents.

No. 370 /S.T.

Dt. 19/2 /2024.



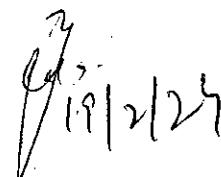
REGISTRAR

SERVICE TRIBUNAL
HYBER PAKHTUNKHWA
PESHAWAR.

Noor Muhammad Khattak Adv.
High Court Peshawar.

R/Sis

Resubmitted
after necessary completion


19/2/24

BEFORE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 284-P/2024

MR. SAKHI MARJAN

VS

EDU: DEPARTMENT

INDEX

S. NO	DOCUMENTS	ANNEX	PAGE
1.	Memo of Service Appeal with affidavit	1-3
2.	Application for interim relief with affidavit		4
3.	Copies of Educational Testimonials	A	5-7
4.	Copy of appointment order	B	8-9
5.	Copy of Seniority list	C	10-13
6.	Copy of Working Paper	D	14
7.	Copy of the impugned notification dated 07/11/2023	E	15-17
8.	Copy of the departmental appeal	F	18
9.	Copy of memo of WP and order dated 29/11/2023	G&H	19-25
10.	Wakalat Nama	26

APPELLANT

THROUGH:

**NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT**

**BEFORE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR**

SERVICE APPEAL NO. 284 -/2024

Mr. Sakhi Marjan,
PSHT, GPS Shamkhel Naway Kallay District Kurram

..... **APPELLANT**

VERSUS

The Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.

..... **RESPONDENTS**

SERVICE APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 07/11/2023, WHEREBY THE APPELLANT BEING ELIGIBLE IN ALL RESPECT, IGNORED FOR PROMOTION TO THE POST OF SST (G) (BPS-16) AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:-

That on acceptance of the instant service appeal, the impugned notification dated 07/11/2023 may kindly be modified/rectified to the extent of appellant and the appellant may kindly be considered for promotion to the post of SST (G) (BPS-16) w.e.f. 07/11/2023, when colleagues of the appellant, promoted with all back benefits. Any other remedy which this august Tribunal deem fit may also be awarded in favour of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts giving rise to the present appeal are as under:

1. That Appellant is the law-abiding citizen of Pakistan and is the employee of the respondent department in BPS-14 as PSHT.

5. That the respondent department prepared Working Paper for Promotion to the SST (G) BPS-16 vide dated 19/09/2023, whereby 4 posts from the quota of PST, SPST & PSHT were reserved to be promoted under 20% to the post of SST (G). That as per the ibid working paper, the Appellant was/is at serial No 4 and as such recommended by the authority for the promotion to the post of SST (G). Copy of Working Paper is attached as annexure.....**D**
6. That the Appellant being top of the seniority list, eligible in all respect to be promoted to the post of SST (G) BPS-16, quite hopeful for his promotion, but astonishingly the respondents issued the impugned Notification dated 07/11/2023, whereby the Appellant has been ignored and his name was dropped from the impugned order without any reason and justification. Copy of the impugned notification dated 07/11/2023 is attached as annexure.....**E**
7. That the Appellant feeling aggrieved from the impugned notification dated 07/11/2023 preferred departmental appeal/ representation before the competent authority/ respondent, but no response has been given within the stipulated period. Copy of the departmental appeal is attached as annexure.....**F**
8. That the appellant highly aggrieved from the impugned notification, approached before the Honourable Peshawar High Court, Peshawar in WP No 5322-P/2023, whereby the same has been dismissed in limine vide order dated 29/11/2023 under the bar of Article 212 of the Constitution of Pakistan, 1973. Copy of memo of WP and order dated 29/11/2023 are attached as annexure...**G&H**
9. That feeling aggrieved from the inaction of the respondents and having no other remedy the appellant preferred the instant appeal on following grounds inter alia:-

GROUND:

- A- That the impugned notification dated 07/11/2023, whereby the Appellant was ignored and not promoted to the post of SST (G) BPS-16 is against the law, facts, norms of natural justice and materials, hence the same is liable to be set aside.
- B- That Appellant has not been treated by the respondents in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.
- C- That according to section 8 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 read with rule 17 of the Khyber Pakhtunkhwa Civil Servant (APT) Rules, 1989 the seniority inter se of a civil servant appointed to service, cadre or post shall be determined in the case of persons appointed by initial recruitment in accordance with the merit assigned by the Commission or as the case may, the department selection committee; provided that persons

selected for appointed to post in earlier selection shall rank senior to the persons selected in a later selection.

- D- That the respondent department while issuing the impugned notification dated 07/11/2023, has totally bypassed the settled principles of law, rules & precedents, therefore, the same is untenable in the eyes of law.
- E- That the treatment meted out to the Appellant is a clear violation of the fundamental rights of the Appellant.
- F- That the respondent despite of the fact that four posts are falling vacant in the 20% promotion quota reserved for PST Cadre ignored the appellant from promotion to the post of SST (G).
- G- That the Appellant has been discriminated by the respondents on the subject noted above and as such the respondents violated the principle of natural justice as well Article 27 of the constitution of the Islamic Republic of Pakistan, 1973.
- H- That according to article 38 (e) of the constitution of the Islamic Republic of Pakistan, 1973, state is bound to reduce disparity in the income of persons in the service of the Pakistan.
- I- That Appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may very graciously be accepted as prayed for, please.



APPELLANT

THROUGH:

NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT
&
UMAR FAROOQ MOHMAND
ADVOCATES HIGH COURT

CERTIFICATE:

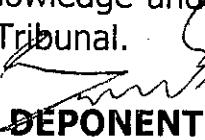
No such like appeal is pending or filed between the parties on the subject matter before this Honorable Tribunal.



Advocate

AFFIDAVIT

I, Mr. Sakhi Marjan, PSHT, GPS Shamkhal Naway Kallay District Kurram do hereby solemnly affirm on oath that the contents of the above appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.



DEPONENT

-4-

BEFORE KHYBER PAKHTUNKWA SERVICES TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. -P/2024

MR. SAKHI MARJAN

VS

EDU: DEPARTMENT

**APPLICATION FOR GRANT OF INTERIM RELIEF, RESTRAINING
THE RESPONDENTS, NOT TO CONSTITUTE DEPARTMENTAL
PROMOTION COMMITTEE FOR PROMOTION, TILL THE
DISPOSAL OF THE MAIN APPEAL.**

R/SHEWETH:

- 1- That the above mentioned appeal along with this application has been filed the appellant before this august Tribunal in which no date has been fixed so far.
- 2- That appellant filed the above mentioned appeal against impugned notification dated 07/11/2023, whereby the appellant being eligible in all respect, ignored for promotion to the post of SST (G) (BPS-16) and the appellant preferred departmental appeal/ representation before the competent authority/ respondent, but no response has been given within the stipulated period.
- 3- That all the three ingredients necessary for the stay is in favor of the appellant.
- 4- That impugned notification dated 07/11/2023 had been issued by the respondents in utter disregard of law and prevailing Rules.

It is therefore, most humbly prayed that on acceptance of this application the respondents may kindly be restrained from constituting Departmental Promotion Committee, till the disposal of the above mentioned service appeal.


APPELLANT

THROUGH:

NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT

AFFIDAVIT

I, Mr. Sakhi Marjan, PSHT, GPS Shamkhal Naway Kallay District Kurram do hereby solemnly affirm on oath that the contents of the above application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.


DEPONENT



Serial No. A003353

Certified that Mr. / Ms. SAKHI MARJAN

Son / Daughter of FAZAL KHAMID

Registration No.: 01NKT0357

Roll No.: BC655806

having completed the prescribed requirements in semester

SPRING 2016

is awarded the degree of:

MASTER OF EDUCATION (M.ED) ✓

He / She has secured 61 % marks and has been placed in B grade.

MARJAN

CONTROLLER OF EXAMINATIONS

Result declared on: March 17, 2017

Date of Issue: June 19, 2018

VICE-CHANCELLOR

THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT, ISSUED SEPARATELY



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Bahauddin Zakariya University -6-



Serial No. 283640

Certified that Mr. / Ms. SAKHI MARJAN

Son / Daughter of FAZAL KHAMID

Registration No: 01NKT0357 Roll No: U691976

having successfully completed the prescribed requirements
In semester AUTUMN 2007 is awarded the degree of

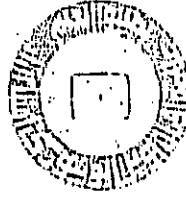
Bachelor of Education (B.Ed)

He/She has secured 60 % marks and has been placed in B grade.

CONTROLLER OF EXAMINATIONS

Farzad

VICE-CHANCELLOR



Result declared on: July 26, 2008

Date of Issue: April 3, 2018

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY

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Serial No. 020667

Serial No. 10647

بُشِّرَ الْأَئِمَّةُ بِالْجَنَّةِ

Registration No. 2009-PCKUM-406

Kohat University
of Science & Technology, Kohat
(Pakistan)

Session ANNUAL 2010

SAKHI MARJAN SON of FAZAL HAMEED and a student
of KURRAM AGENCY having passed the prescribed
examination held in SEPTEMBER 20 10, is this day admitted by

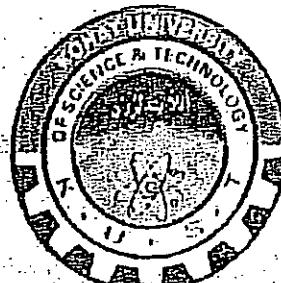
The Kohat University of Science & Technology, Kohat
to the Degree of

Master of Arts

in the SECOND Division

The Subject of examination being ISLAMIYAT

The Examination was taken as a whole



Controller of Examinations

Counter-signed

Vice Chancellor

Dated on FEBRUARY 07, 2011

B-6

APPOINTMENT

As already approved by the Selection Committee, the appointment of the following P.T.C. (Guru & Panjab) teachers is hereby ordered to the different of public service with effect from the date of their taking over charge i.e. 1.G. term to 1993-94 and 1993-95 for those who are FA/FSC.

Anual Division

S. No	Name of Candidate	Father's Name	School Where Appointed	Remarks
1.	Khalid Marjan	Abdul Marjan	GPS Sarpathi No. 2 P.R.	Against vacant PTC post.
2.	Ahmed Khan	Mawali Khan	GPS Gantot P.R.	...do...
3.	Bahadur Khan	Bawang Khan	GPS Nirdo Tang P.R.	...do...
4.	Shanbir Gul	Mohammed Gul	GPS Sankhiwal Dara P.R.	...do...
5.	Sukhil Marjan	Fazalullah	GPS Sheldighi P.R.	...do...
6.	Fazal Gul	Mohammed Gul	GPS Dera Bagha P.R.	...do...
7.	Shukar Khan	Faqir Khan	GPS Audip P.R.	...do...
8.	Tasli Marjan	Abdul Marjan	GPS Khoni Khet P.R.	...do...
9.	Usman Khan	Sultan	GPS Sarpathi No. 1 P.R.	...do...
10.	Noor Janan	Amanullah Shah	GPS Mayo Tang P.R.	...do...
11.	Mohammad Daud Shah Sultan	Rahul Khan	GPS Sharqian P.R.	...do...
12.	Iftikhar Khan	Dilbar Khan	GPS Tannwalli P.R.	...do...
13.	Dilawar Khan	Farid Behmar	GPS Warai Beta P.R.	...do...
14.	Ghazal Marjan	Farhan Jan	GPS Dajla P.R.	...do...
15.	Salman Khan	Hajji Butwader	GPS Muregham Dara P.R.	...do...
16.	Behimet Balloo	Mohammed Younis	GPS Qadria Kall P.R.	...do...
17.	Fazal "ard	Farid Behmar	GPS Pat Green P.R.	...do...
18.	Fazal Wahid	Farid Wahid	GPS Sambaghari P.R.	...do...
19.	Zahid Khan	Farid Wahid	GPS Darjal No. 1 P.R.	...do...
20.	Sher Afshan	Farid Wahid	GPS Darjal No. 2 P.R.	...do...
21.	Ahmed Javed	Mohammed Aslam	GPS Khana Chana P.R.	...do...
22.	Mohammad Aslam	Mohammed Aslam	GPS Gowdar P.R.	...do...
23.	Mohammad Nabi	Abdul Behmar	GPS Tabai Tangi P.R.	...do...
24.	Zareef Khan	Faridullah Khan	GPS Shar Kalji P.R.	...do...
25.	Abdul Ghaffar	Mawa Khan	GPS Tannwalli P.R.	...do...
26.	Lawang Khan	Mohammed Khan	GPS Shar Kalji P.R.	...do...
27.	Juman Badshahi	Mir Nasir	GPS Shar Kalji P.R.	...do...
28.	Jamil Khan	Mohammed Zamir	GPS Shar Dara P.R.	...do...
29.	Speen Gul	Natali Gul	GPS Wani Al Lashkari P.R.	...do...
30.	Aziz Salam	Mohamed Ali	GPS Khawar Mum P.R.	...do...
31.	Zaman Khan	Mohammed Gul	GPS Machakli Kall P.R.	...do...
32.	Abdul Hanaf	Hajree Gul	GPS Kewal Taro P.R.	...do...
33.	Hajeebum Behmar	Hajji Javed	GPS Balkhi Sharif P.R.	...do...
34.	Mohammad Shaukat	Momin Khan	GPS Hajjali Gul P.R.	...do...
35.	Jehanzeb Khan	Hajji Dina	GPS Paragona P.R.	...do...
36.	Mohmmad Gul	Jaffer Gul	GPS Hego Kall P.R.	...do...

سیاست دار کنٹرول میں پکی 18 نومبر 1996-97ء

N/

کمپلینٹ 19 نومبر 1997-98ء 46: 6 19 نومبر 1997-98ء
ان کے اگر کوئی مخالفت ہے تو اس کا مذکور کرو۔

ریڈیٹ / ایڈٹ

OFFICE OF THE AGENCY EDUCATION OFFICER, KURRAM AGENCY
PARACHINAR
APPOINTMENT

As already approved by the Selection Committee, the appointment of the following PTC (Male & Female) Teachers is hereby ordered in the interest of public service with effect from the date of their taking over charge i.e. 01/06/1999 in BPS No 7 and BPS No 09 for those who are FA/FSC in 2nd Division.

S. No	Name of Candidate	Father's Name	School where appointed	Remarks
1.	Khalil Marjan	Abdul Marjan	GPS Sarpak No 2 FR	Against vacant PTC Post
2.	Ahmad Jan	Nawab Jan	GPS Ganiow FRdo...
3.	Bahadur Khan	Buzarg Khan	GPS Mirdo Tang FRdo...
4.	Shamim Gul	Muhammad Ullah	GPS Sarkhai Dara FRdo...
5.	Sakhi Marjan	Fazal Hamid	GPS Shekhani FRdo...
6.	Fazal Hakim	Hutbar Khan	GPS Dool Bagha FRdo...
7.	Shukar Khan	Faqir Khan	GPS Auda FRdo...
8.	Tooti Marjan	Abdul Marjan	GPS Khano Khel FRdo...
9.	Usman Khan	Sultan	GPS Sarpakh No 1 FRdo...
10.	Noor Jamal	Aman Ulalh	GPS Mirdo Tang FRdo...
11.	No Need	No Need	No Need	No Need
12.	No Need	No Need	No Need	No Need
13.	No Need	No Need	No Need	No Need
14.	No Need	No Need	No Need	No Need
15.	No Need	No Need	No Need	No Need
16.	No Need	No Need	No Need	No Need
17.	No Need	No Need	No Need	No Need
18.	No Need	No Need	No Need	No Need
19.	No Need	No Need	No Need	No Need
20.	No Need	No Need	No Need	No Need
21.	No Need	No Need	No Need	No Need
22.	No Need	No Need	No Need	No Need
23.	No Need	No Need	No Need	No Need
24.	No Need	No Need	No Need	No Need
25.	No Need	No Need	No Need	No Need
26.	No Need	No Need	No Need	No Need
27.	No Need	No Need	No Need	No Need
28.	No Need	No Need	No Need	No Need
29.	No Need	No Need	No Need	No Need
30.	Amir Sultan	Mugal Khan	GPS Khawri Bani FRdo...
31.	Zaman Khan	Abdullah Jan	GPS Mashaki Khel FRdo...
32.	Abdul Manaf	Hazrat Gul	GMPS Kernal Baz FRdo...
33.	Mujeeb Ur Rehman	Said Jamal	GPS Nikah Ziarat FRdo...
34.	Muhammad Sharif	Momin Khan	GPS Hamaish Gul FRdo...
35.	Jehanzeb Khan	Haji Din	GPS Barjzona FRdo...
36.	Rehman Gul	Jaffar Gul	GPS Rego Kali FRdo...

9

S.No	Name of Candidate	Father's Name	School Where appointed	Remarks
37.	Ashraf Khan	Ghazi Marjan	GPS Sher Darra P.R.	Against vacant PTC post.
38.	Naseeb Shah	Miriam Shah	GPS Mughan Wora P.R.	...do...
39.	Abdur Rahim	Junn Khan	GPS Khawar Milli P.R.	...do...
40.	Mohammad Younas Yousaif Khan		GPS Takhtoo P.R.	...do...
41.	Wibat Khan	Niwab Khan	GPS Koljidad Kiel. P.R.	...do...
42.	Mohammad Salam Nav Qilai Khan		GPS Qurdil. P.R.	...do...
43.	Bahadur Khan	Sardar Khan	GPS Zara Mela P.R.	...do...
44.	Cul Hussain	Pasta Cul	GPS Zawn P.R.	...do...
45.	Nayab Mohammad Khan Mohammad		GPS Gandoor P.R.	...do...
46.	Shamsunn Rehman	Abdul Rehman	GPS Bazn P.R.	...do...
47.	Naseem	Syed Khan	CCPS Osai P.R.	...do...
48.	Bibi Maryam	Shama Gul	CCPS Gundal. P.R.	...do...
49.	Basmeen Begum	Fazil Tawab	CCPS Trang Walli P.R.	...do...
50.	Abida Nawaz	Nawaz Khan	CCPS Badina P.R.	...do...
51.	Nawab Begum	Mir Ahmad	CCPS Dogar No.1 P.R.	...do...
52.	Nasreen Bibi	Zarif Khan	CCPS Angori. P.R.	...do...
53.	Aalia	Mohammad Ghulam	CCPS Chappri. U.K	...do...
54.	Naseem	Saadat Khan	CCPS Purai Kanda Sultan U.K	...do...
55.	Zainab Bibi	Khair Ali	CCPS Pura Kahla Sultan U.K	...do...
56.	Shazia	Sharif Hussain	CCPS Lewan Khel U.K	...do...
57.	Bibi Shah Jan	Yousof Hussain	CCPS Ghungari U.K	...do...
58.	Iqbal Bano	Iftikhar Hussain	CCPS Mata Mali Khel U.K	...do...
59.	Rubaba Bibi	Iftikhar Hussain	CCPS Mata Mali Khel U.K	...do...
60.	Sakina Bibi	Abrar Hussain	CCPS Mata Mali Khel U.K	...do...
61.	Bibi Maryam	Asghar Jan	CCPS Chundi Khel U.K	...do...
62.	Bibi Sughra Jan S.Ahmad Jan		CCPS Ghuzgari U.K	...do...

- Note:- 1. The Candidates are directed to produce their Medical certificates from the A.H.O Hospital Parachinar.
2. The age of the candidates should be between 18-33 years for male and 18-40 years for female candidates.
3. Their appointment is purely made on temporary basis and liable to termination at any time without assigning any notice; in case they wished to resign their posts, they will have to give one month prior notice or forfeit one month pay in lieu thereof.
4. Charge report in duplicate should be submitted to this office.
5. Certified that no payment will be made to the appointees unless & until their domicile, academic & professional certificates duly verified from the issuing authorities concerned, also produce their National Identity cards.

Endst No 1745-131 Edu Dated 6/9/99

Copy forwarded to the:-

1. Director of Education FATA Peshawar In dupl.
2. Regional Director of Education FATA Kohat Region
- 3-71. Candidates concerned, Accountant Local Offices,
72. Office record.

Agency Education Officer
Kurram Agency Parachinar

72

OFFICE OF THE AGENCY EDUCATION OFFICER, KURRAM AGENCY
PARACHINAR

S. No	Name of Candidate	Father's Name	School where appointed	Remarks
37.	Ashraf Khan	Ghazi Marjan	GPS Sher Dara FR	Against vacant PTC Post
38.	Naseeb Shah	Miram Shah	GPS Murghan Dara FRdo...
39.	Abdur Rahim	Juma Khan	GPS Khawo Kali FRdo...
40	Mohammad Younas	Yousaf Khan	GPS Takhtoot FRdo...
41	Qibat Khan	Nawab Khan	GPS Kohidad Khe FRdo...
42	Muhammad Salam	Havildar Khan	GPS Gundal FRdo...
43	No Need	No Need	No Need	No Need
44	No Need	No Need	No Need	No Need
45	No Need	No Need	No Need	No Need
46	No Need	No Need	No Need	No Need
47	No Need	No Need	No Need	No Need
48	No Need	No Need	No Need	No Need
49	No Need	No Need	No Need	No Need
50	No Need	No Need	No Need	No Need
51	No Need	No Need	No Need	No Need
52	No Need	No Need	No Need	No Need
53	No Need	No Need	No Need	No Need
54	No Need	No Need	No Need	No Need
55	No Need	No Need	No Need	No Need
56	No Need	No Need	No Need	No Need
57	Bibi Shah Iran	Yousaf Hussain	GGPS Ghugari UKdo...
58	Iqbal Bano	Iftikhar Hussain	GGPS Mata Mali Kheldo...
59	Rubaba Bibi	Iftikhar Hussain	GGPS Mali Khel UKdo...
60	Sakina Bibi	Abrar Hussain	GGPS Mata Mali Kheldo...
61	Bibi Maryam	Asghar Jan	GGPS Ghundi Kheldo...
62	Bibi Sughra Jan	S. Ahmad Jan	GGPS Ghuzgari UKdo...

NOTE:-

1. The candidates are directed to produce their Medical certificates from the AHO Hospital, Parachinar.
2. The age of the candidates should be between 18-33 years for male and 18-40 years for female candidates.
3. Their appointment is purely made on temporary basis and liable to termination at any time without assigning any notice, in case they wished to resign their posts, they will have to give one month prior notice or forfeit one month pay in lieu thereof.
4. Charge report in duplicate should be submitted to this office
5. Certificated that no payment will be made to the appointee unless and until their domicile, academic & professional certificate duly verified from the issuing authorities concerned, also produce their National Identity Cards.

Agency Education Officer
Kurram Agency

OFFICE OF THE DISTRICT EDUCATION OFFICER MALE KURRAM.

(Seniority List of PSHT/SPST/PST Male)

Sry. No	Name of Teacher	Father's Name	Name Of School	DOB	Desig:	B.P.S	Qualification	Date of 1st Appointmet	Date of Appointmet as Regular PST	Remarks	
1	Muhammad Ismail	Hussain Ghulam	GPS Bughra	15.02.1965	PSHT	15	FA	PTC/CT	21.12.1983	21.12.1983	
2	Rashid Hussain	Gauhar Jan	GPS Boshara No 2	08.03.1966	PSHT	15	FA	PTC/CT	27.09.1984	27.09.1984	
3	Sayed Hussain	Sayed Lal Hussain	GPS Dago Kal	05.01.1964	PSHT	15	FA	PTC	13.07.1985	13.07.1985	
4	Hamid Hussain	Mukhtar Ali	GPS Dangla	10.04.1964	PSHT	15	BA	PTC	03.04.1984	31.05.1987	
5	S. Kamal Hussain	Sayed Meran	GPS Lali Mella	10.01.1967	PSHT	15	FA	PTC	12.03.1986	31.05.1987	
6	S Asghar Jan	S Yousaif Hussain	GPS Kharadin	07.04.1968	PSHT	15	FA	PTC	17.09.1987	17.09.1987	
7	Rauf Hussain	Gul Ali	GPS No:1 Parachinar	03.04.1965	PSHT	15	MA/B.Ed	PTC/CT	17.09.1987	17.09.1987	BA 3rd Division
8	Dildar Hussain	Muhammad Jan	GPS Durawl	28.11.1965	PSHT	15	FA	PTC	17.09.1987	17.09.1987	
9	Asghar Jan	Akbar Jan	GPS Koshar	28.01.1967	PSHT	15	FA	PTC	17.05.1985	17.01.1990	
10	Gul Nat Khan	Muhammed	GPS Sadda LK.	02.01.1965	PSHT	15	FA	PTC	25.05.1987	17.01.1990	
11	Habib Hussain	Zamin Hussain	GPS Tangal LK.	10.04.1968	PSHT	15	FA	PTC/CT	09.05.1985	14.11.1990	
12	Karim Khan	Azim Khan	GPS Zawa CK	10.04.1967	PSHT	15	FA	PTC	22.10.1984	22.10.1991	
13	Matl-u-llah	Gul Rasam Khan	GPS Palooseen CK	02.01.1966	PSHT	15	FA	PTC	05.05.1985	22.10.1991	
14	Lai Hussain	Sardar Ali	GPS Shingak	05.01.1965	PSHT	15	FA	PTC	04.03.1987	22.10.1991	
15	S Mir Arab Shah	S Muhd Akber	GPS Mardan Ali Kall	12.03.1968	PSHT	15	FA	PTC	17.05.1987	22.10.1991	
16	Ahmed Ali	Qambar Ali	GHS Ali Zai LK.	09.03.1968	PSHT	15	FA	PTC	28.11.1987	22.10.1991	
17	Mohib Hussain	Nazar Hussain	GPS Koshar	16.04.1965	PSHT	15	FA	PTC	26.09.1988	22.10.1991	
18	S. Ghulam	Akbar Ghulam	GPS Noor Khan Kanda	12.08.1969	PSHT	15	FA	PTC	03.03.1992	03.03.1992	
19	S Siraj Hussain	S Hashim Hussain	GPS Taki	24.04.1970	PSHT	15	BA	PTC	03.03.1992	03.03.1992	
20	Niaz Ali	All Hashim	GPS Pukhra	10.05.1969	PSHT	15	BA	PTC	27.03.1982	30.04.1992	
21	Ajmal Ali	Ajab Khan	GPS Leel Gada CK	06.03.1964	PSHT	15	FA	PTC	07.10.1985	30.04.1992	
22	Muhammad Hussain	Mir Abass Khan	GPS Gharbeena CK	15.04.1965	PSHT	15	FA	PTC	09.03.1987	22.11.1992	
23	Nazim Hussain	Sabit Hussain	GPS Dandar Sahra	02.04.1968	PSHT	15	FA	PTC	19.03.1988	22.11.1992	
24	Inam Ali	Muhammad Amir	GPS Chapper	01.05.1970	PSHT	15	FA	PTC	12.08.1990	22.11.1992	
25	Essa Hussain	Sarmad Ali	GPS Pesar Duperzai	11.03.1970	PSHT	15	BA/B.Ed	PTC/B.Ed			

26	S.Wazir Hussain	S.Fida Hussain	GPS Sultan Kanda LK.	15.02.1969	PSHT	15	F.A	PTC	03.03.1992	22.11.1992
27	Muhammad Ayub	Muhammid Yousuf	GPS Mata Sangar	25.02.1969	PSHT	15	F.A	PTC	03.03.1992	22.11.1992
28	Iqbal Hussain	Wahab Ali	GPS Kanda Abbas	01.09.1970	PSHT	15	B.A	PTC	03.03.1992	22.11.1992
29	S.Ilyas Hussain	S.Jan Hussain	GHS Kirman	02.03.1970	PSHT	15	F.A	PTC	01.04.1993	11.04.1993
30	Arbab Ali	Khan	GPS Bughald	02.01.1969	PSHT	15	B.A	PTC	01.04.1993	11.04.1993
31	Iqbal Hussain	Gulab Hussain	GPS Larzar Shalozan	05.02.1974	PSHT	15	MA	PTC	01.04.1993	11.04.1993
32	S.Jamal Udin Shah	S.Ali Udin Shah	GPS Yaqooti	24.11.1971	PSHT	15	F.A	PTC	23.06.1993	07.07.1993
33	Mohsin Ali	Ahmed Ali	GHS Nastikot	12.03.1965	PSHT	15	B.A	PTC	07.10.1986	25.12.1993
34	S.Ibrar Hussain	S.Fazal Hussain	GPS No2 Parachinar	10.04.1970	PSHT	15	F.A	PTC	26.09.1988	25.12.1993
35	Aman Ali	Hassan Ghulam	GPS Mirdad Khel	08.02.1970	PSHT	15	F.A	PTC	03.03.1992	25.12.1993
36	Jamal Abdul Nasir	Zulmal Khan	GHS Shah Ibrahim LK.	10.04.1972	PSHT	15	F.A	PTC	23.06.1993	25.12.1993
37	Sarfraz Khan	Muhammad Khan	GPS Samkhakot CK.	09.05.1968	PSHT	15	F.A	PTC	23.06.1993	25.12.1993
38	Muhd Anwar	Muhd Akbar Khan	GPS Tindo LK.	20.12.1972	PSHT	15	F.A	PTC	29.09.1994	01.10.1994
39	Abdul Jallil	Khan Hassan	GPS Dargal No1 CK.	12.01.1967	PSHT	15	BA	PTC	29.09.1994	01.10.1994
40	Aleeb Hussain	Ahmed Jan	GPS China	21.04.1971	PSHT	15	F.A	PTC	28.02.1989	09.01.1995
41	Abdul Majeed Khan	Haji Majan	GPS Makhi Zai LK.	10.04.1969	PSHT	15	F.A	PTC	23.11.1989	09.01.1995
42	Shaukat Ali	Muhammad Ali	GPS Kotki Bilyamne LK.	04.03.1971	PSHT	15	F.A	PTC	23.11.1989	09.01.1995
43	Rashid Khan	Aqal Shah	GPS Jehan China CK.	05.01.1970	PSHT	15	F.A	PTC	23.11.1989	09.01.1995
44	Qadir Khan	Muhammad Gul	GPS APA Colony	26.03.1970	PSHT	15	F.A	PTC	10.10.1994	09.01.1995
45	Qayum Khan	Ghafoor Khan	M/S Toor Nazoon CK.	02.01.1973	PSHT	15	F.A	PTC	10.10.1994	09.01.1995
46	Noor Mar Jan	Ghulam Jan	GPS Gundal CK.	05.03.1968	PSHT	15	F.A	PTC	10.10.1994	09.01.1995
47	Jamil Hassan	Gul Hassan	GPS Jalamuya CK	20.09.1974	PSHT	15	BA	PTC	10.10.1994	09.01.1995
48	Abbas Ali	Sultan Ali	GHS Mbrjamal	05.04.1974	PSHT	15	F.A	PTC	10.10.1994	09.01.1995
49	Sardar Ali	Muhammad Ali	GPS No 2 Maij Khal	18.03.1970	PSHT	15	BA	PTC	10.10.1994	09.01.1995
50	Munawar Hussain	Gul Hussain	GPS Alzai LK.	12.02.1974	PSHT	15	F.A	PTC	10.10.1994	09.01.1995
51	Abdul Manan	Abbas Khan	GPS Aud CK.	28.02.1964	PSHT	15	F.A	PTC	23.11.1989	25.05.1996
52	Nizam-U-Din	Ali Mohammad	GPS Khar Kal LK.	15.11.1970	PSHT	15	F.A	PTC	23.11.1989	25.05.1996
53	Muhsin Naeem	Khan	GPS Bagzai LK.	15.04.1965	PSHT	15	F.A	PTC	09.04.1990	25.05.1996
54	Gul Rab	Noor Hassan	GPS Suranga	15.10.1968	PSHT	15	F.A	PTC	10.10.1994	25.05.1996
55	S.Mohsin Ali Shah	Sayed Baqir	GPS Sultan LK.	08.02.1971	PSHT	15	F.A	PTC	10.10.1994	25.05.1996
56	S Mumtaz Hussain	S.Naqeeb Hussain	GPS Mir Alam Sahra	03.07.1974	PSHT	15	B.A	PTC/CT	10.10.1994	25.05.1996
57	Jamal Dar	Minadar	GPS Mirmatkhel CK.	04.01.1970	PSHT	15	F.A	PTC	05.11.1995	25.05.1996
58	Hafeez-ur-Rehman	Mani Khan	GPS Bagan LK.	19.10.1977	PSHT	15	BA	PTC/CT	16.11.1995	25.05.1996
59	Niaz Ali	Mizan Ali	GPS Pukhra	15.04.1972	PSHT	15	BA	PTC	05.11.1995	23.08.1996

60	S. Muhd Sbtain	S. Noor Hussain	GPS Qubadshakhel	20.05.1972	PSHT	15	F.A	PTC	06.03.1995	31.12.1996	
61	Wazir Azam	Ahmed Khan	GPS Sra Ghurga LK.	01.10.1973	PSHT	15	BA	PTC	05.11.1995	13.05.1997	
62	Jamal U Din	Muhammad Safar	GPS Gawa Sharif CK.	01.05.1970	PSHT	15	FA	PTC	05.11.1995	13.05.1997	
63	Jauhar Hussain	Gauhar Hussain	GPS Pish Imam Colony	12.02.1973	PSHT	15	BA	PTC	04.6.1996	13.05.1997	
64	Wazir Gul	M.Yaqoob Khan	GPS Makhrani	03.02.1974	PSHT	15	FA	PTC	31.08.1996	13.05.1997	
65	Saber Jaffi	Mir Bat Khan	GPS Kotri CK.	04.11.1964	PSHT	15	FA	PTC	01.11.1994	30.06.1997	
66	Sultan Jan	Haji Mohammad	GPS kuda CK.	04.03.1970	PSHT	15	FA	PTC	01.03.1995	27.02.1998	
67	Latifullah	Abdul Sattar	GPS Tarral CK.	15.12.1967	PSHT	15	FA	PTC	13.11.1995	27.02.1998	
68	Laiq Bad Shah	Khal Bad Shah	GPS Takhtak CK.	20.11.1972	PSHT	15	FA	PTC	31.08.1996	27.02.1998	
69	Said Jamil	Said Ghulam	GPS Bagen LK.	02.02.1972	PSHT	15	BA	PTC	12.07.1996	27.02.1998	
70	Arbab Khan	Zarif Khan	GPS Minato CK.	26.05.1976	PSHT	15	FA	PTC	12.02.1996	27.02.1998	
71	Sultan Muhammad	Mohammad Khan	GPS Sadda ND;2 LK.	01.02.1972	PSHT	15	BA	PTC	16.11.1995	15.04.1998	
72	Abbas Ali	Mashallah	GPS Shaldani Sehra	30.03.1976	PSHT	15	FA	PTC	19.09.1998	19.09.1998	
73	Jamal Hussain	Nisar Hussain	GPS Ismail khel colony	04.03.1979	PSHT	15	MA/B.Ed	PTC/CT	19.09.1998	19.09.1998	
74	S.Bashir Hussain	S.Muhd Raza	GPS Speena Mela	10.04.1974	PSHT	15	FA	PTC	3	19.09.1998	19.09.1998
75	Sultan Muhd	Ghulam Muhd	GPS Churam CK.	12.04.1975	PSHT	15	BA	PTC	4	19.09.1998	19.09.1998
76	Fakhar-e-Alam	Mohd Alam	GPS Tanorik CK.	01.04.1979	PSHT	15	BA	PTC	5	19.09.1998	19.09.1998
77	Aslim Khan	Asmatullah Khan	GPS Lower Manduri LK	27.12.1976	PSHT	15	MA	PTC	10.12.1998	10.12.1998	
78	Zahid Hussain	Rafiq Hussain	GPS Dall	12.07.1974	PSHT	15	FA	PTC	01.11.1994	11.05.1999	
79	Tika Khan	Shah Wall Khan	GPS Sarak CK.	07.03.1976	PSHT	15	BA	PTC	14.11.1994	11.05.1999	
80	Qudrat Khan	Haji Layar Khan	GPS Narari CK.	01.04.1972	PSHT	15	BA/B.Ed	PTC/CT	23.04.1995	11.05.1999	
81	Abdullah	Akbar Khan	GPS Tindo CK.	09.08.1975	PSHT	15	FA	PTC	01.11.1995	11.05.1999	
82	Ahmad Shah	Haleem Shah	GPS Kot Meran CK.	01.08.1973	PSHT	15	BA/B.Ed	PTC	01.06.1999	01.06.1999	
83	Shamim Gul	Muhammad Latif	GPS Sarkawibora CK.	20.07.1974	PSHT	15	BA/B.Ed	PTC/CT	01.06.1999	01.06.1999	
84	Sakhi Marjan	Fazal Hameed	GPS Arghunja CK.	20.04.1976	PSHT	15	BA/B.Ed	PTC/CT	01.06.1999	01.06.1999	
85	Usman Khan	Sultan	GPS Gandaw CK.	05.04.1972	PSHT	15	BA	PTC	01.06.1999	01.06.1999	
86	Noor Jamal	Amanullah Khan	GPS Mirdo Tang CK.	15.03.1979	PSHT	15	MA/B.Ed	PTC	01.06.1999	01.06.1999	
87	Dilawar Khan	DB Bari Khan	GPS Shalgoyyan CK.	01.03.1979	PSHT	15	BA/B.Ed	PTC/CT	01.06.1999	01.06.1999	
88	Ghazi Marjan	Gul Rehman	GPS Jalamaaya CK.	01.03.1974	PSHT	15	FA	PTC	01.06.1999	01.06.1999	
89	Salamat Khan	Sultan Jan	GPS Pastawani CK.	16.04.1977	PSHT	15	FA	PTC	01.06.1999	01.06.1999	
90	Rahmat Salam	Haji Subdar	GPS Sur Khavi Dera CK.	07.06.1977	PSHT	15	FA	PTC	01.06.1999	01.06.1999	
91	Fazal Bari	Mohd Younas	GPS Said Ali Mela CK.	01.03.1971	PSHT	15	BA	PTC/CT	01.06.1999	01.06.1999	
92	Fazal Wahid	Said Rahim	GPS Pastawani CK.	06.03.1979	PSHT	15	MA/B.Ed	PTC/CT	01.06.1999	01.06.1999	
93	Zabid Khan	Lal Wazir	GPS sadda No 1 LK.	12.03.1977	PSHT	15	MA/B.Ed	PTC/CT	01.06.1999	01.06.1999	

94	Sher Akbar	Said Jamal	GPS Khawaga China CK.	01.01.1978	PSHT	15	BA	PTC	01.06.1999	01.06.1999
95	Abdul Jallil	Eid Akbar	GPS Dar Alsherazi CK.	15.05.1975	PSHT	15	MA/B.Ed	PTC	01.06.1999	01.06.1999
96	Muhammad Ayaz	H.Khan Baz	GPS Sandaghari CK.	20.08.1975	PSHT	15	BA/B.Ed	PTC	01.06.1999	01.06.1999
97	Muhammad Nahjil	H.Abdul Khanan	GPS Suranga LK.	13.05.1976	PSHT	15	MA(Eco)/M.Ed	PTC	01.06.1999	01.06.1999
98	Abdul Ghafoor	Mewa Khan	GPS Shekhama CK.	04.01.1975	PSHT	15	BA	PTC	01.06.1999	01.06.1999
99	Lawang Khan	Haji Muhd Khan	GPS Shalgaryan CK.	02.05.1979	PSHT	15	MA/B.Ed	PTC/CT	01.06.1999	01.06.1999
100	Jamil Khan	Muhd Yousaf	GPS Rawoot Sadda LK.	08.04.1979	PSHT	15	MA/M.Ed	PTC/CT	01.06.1999	01.06.1999
101	Sreen Gul	Haji Salda Gul	GPS Rawoot Sadda, LK.	20.04.1978	PSHT	15	MA/B.Ed	PTC/CT	01.06.1999	01.06.1999
102	Amir Salam	Mughal Baz	GPS Gawali CK.	08.06.1977	PSHT	15	BA/B.Ed	PTC	01.06.1999	01.06.1999
103	Abdul Manaf	Hazrat Gul	GPS Talo CK.	12.12.1975	PSHT	15	MA/B.Ed	PTC	01.06.1999	01.06.1999
104	Mujeeb u Rehman	Said Jamat	GPS Sateen LK.	03.12.1978	PSHT	15	MA/B.Ed	PTC	01.06.1999	01.06.1999
105	Rehman Gul	Jaffar Gul	GPS Sher Dara CK.	14.12.1978	PSHT	15	FA	PTC/CT	01.06.1999	01.06.1999
106	Nasib Shah	Miran Shah	GPS Shamkhal CK.	12.12.1978	PSHT	15	FA	PTC	01.06.1999	01.06.1999
107	M.Younas Khan	Yousaf Khan	GPS Anguri CK.	02.05.1979	PSHT	15	BA	PTC	01.06.1999	01.06.1999
108	Globt Khan	Nawab Khan	GPS Manato CK.	08.12.1975	PSHT	15	BA	PTC	01.09.1999	01.09.1999
109	Khalil u Rehman	Wali Khan	GPS Barizonia CK.	14.02.1978	PSHT	15	BA	PTC	09.05.1997	14.11.1999
110	Abdul Ghafoor	Rab Nawaz Khan	GPS Khawari Sam CK.	05.05.1979	PSHT	15	BA	PTC	29.02.2000	01.03.2000
111	Tahir Hussain	Ali Hussain	GPS khomasa	21.04.1970	PSHT	15	ESc	PTC	17.10.1994	25.04.2000
112	Mir Jehan	Said Khan	GPS Dogar CK.	08.05.1974	PSHT	15	BA	PTC	14.01.1996	25.04.2000
113	Surat Khan	Nawar Khan	GPS Makhranal CK.	01.01.1970	PSHT	15	FA	PTC	23.01.1996	25.04.2000
114	Najib U Din	Jamal U Din	GPS Taritang CK.	01.03.1975	PSHT	15	BA	PTC	01.03.1996	25.04.2000
115	Zamin Hussain	All Nabi	GPS Matta Kirman	24.01.1975	PSHT	15	BA	PTC	01.06.1999	25.04.2000
116	Ashrif Khan	Ghat Marjan	GPS Duranif CK.	04.03.1975	PSHT	15	MA/M.Ed	PTC	25.09.1996	25.04.2000
117	Gul Nasir Khan	Gul Shan Khan	GPS Sarpak No 2 CK.	15.09.1972	PSHT	15	FA	PTC	10.11.2000	10.11.2000
118	Ulas Khan	Khalsta Jan	GPS Baza CK.	25.02.1980	PSHT	15	MA/B.Ed	PTC	10.11.2000	10.11.2000
119	Mehmood Riaz	Said Rahim	GPS Basal CK.	15.02.1977	PSHT	15	BA	PTC/CT	10.11.2000	10.11.2000
120	Fazal Shah	Amla Shah	GPS Takhtak CK.	25.12.1977	PSHT	15	MA/B.Ed	PTC	10.11.2000	10.11.2000
121	Khalilullah Hashmi	Molvi Noor Alzam	GPS Dar Alsherazi CK.	20.05.1975	PSHT	15	MA/B.Ed	PTC/CT	10.11.2000	10.11.2000
122	Turab Khan	Sher Mat Khan	GPS Mundan CK.	12.05.1982	PSHT	15	MA/B.Ed	PTC/CT	10.11.2000	10.11.2000
123	Khayil Bat Khan	Plaw Khan	GPS Star Jumat CK.	09.01.1979	PSHT	15	MA/B.Ed	PTC/CT	10.11.2000	10.11.2000
124	Muhammad Shafiq	Niaz Bahadar Khan	GPS Kochi LK.	15.08.1978	PSHT	15	MA/B.Ed	PTC/CT	10.11.2000	10.11.2000
125	Zain-U-Din	Mir Bad Shah	GPS Paraw CK.	08.08.1970	PSHT	15	MA/B.Ed	PTC/CT	10.11.2000	10.11.2000
126	Abdul Ghafoor Khan	Noor Muhammad	GPS Zawa CK.	20.03.1969	PSHT	15	MA/B.Ed	PTC	10.11.2000	10.11.2000
127	Shabir Hussain	Muhammad Rasool	GPS Japsiki kall	02.01.1976	PSHT	15	BA	PTC	10.11.2000	10.11.2000

Working Paper for Promotion to SST (G)

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14-WORKING PAPER FOR PROMOTION TO SST (G)ITEM NO 1 PROMOTION TO PST/SPST/PSHT MATE TO THE POST OF SST (G) BPS-14 WAS CONSIDERED AND IN DPC DECIDED AS

Total No of Vacant Post of SST (G)	22
25% initial recruitment quota	5.50= 6
75% promotion quota	8.53=9
40% CT/SCT promotion-quota to SST(G)	4.26=4
4% DM/SDM promotion quota to SST (G)	0.35=1
4% AT/SAT promotion quota to SST (G)	0.35=1
4% TT/STT promotion quota to SST (G)	0.35=1
3% Qari promotion quota to SST (G)	0.35=1
Already promoted PST/SPST/PSHT to SST (G)	(W)
Proposed for promotion to SST (G)	(Q)
Deferred of promotion to SST (G)	

S#	Sr. No	Name of Official	Name of School	Date of Birth	Date of Apppt: as PST	Academic & prof qualification	Remarks
1)	92	S. Bashir Hussain	GPS Speena Mela UK	10/04/1974	19/09/1998	MA/B.Ed/PTC	DNT
2)	99	Abdullah	GPS Tindo UK	09/08/1975	11/05/1999	BA/B.Ed/PTC	Recruited
3)	002	Shamim Gul	GPS Sarkhawidara UK	20/02/1974	01/06/1999	BA/B.Ed/PTC	Recruited
4)	103	Sakhi Marjan	GPS Shamkhali Navi Kali UK	20/04/1976	01/06/1999	BA/B.Ed/PTC	Recruited
5)	105	Noor Jamal	GPS Tindo Navi Kali UK	15/03/1979	01/09/1999	MA/B.Ed/PTC	Recruited

CERTIFICATE

1. All the PSTs (Male) have been included in the panel for promotion of SPST/PSHTs Posts
2. All the PSTs (Male) hold the post on regular basis and non of them is on Adhoc/acting charge/contract basis
3. All the PSTs (Male) have completed the required minimum length of qualifying service and qualifications as required for promotion to SPSTs/PSHT under the rules.
4. None of them is on deputation to any organization under the Federal/Provincial/Autonomous/International Organization.
5. Neither any disciplinary/departmental proceedings/Anti-Corruption/judicial inquiry is pending.



**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

"E"

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.80 (PE)/4-5/SSRC/Medling/2013/Teaching Cadre dated 24th July, 2014; the following SCTs/CTs/PSHTs/SPSTS/PST/SDM/DM/SAT/AT/STT/TT, QOH/QOH are hereby promoted/appointed to the post of SST (G), (Bio/Chem) and (Phy/Maths) in BPS-16 on regular/acting charge basis under the existing policy, on the terms and conditions given below, with immediate effect.

A. SST (G)

1. SCT/CT TO SST (G) BPS-16

S. No.	S.I. No.	Name of Official	Place of Posting	Date of Birth	Date of Appoint. as Regular CT	Qualification	Remarks
1	27	S.Zamin Hussain	GHS Malana	28-04-1965	01-09-2003	BA/B.Ed	Services are placed at the disposal of District Education Officer (M) Kurram for further posting against the vacant post of SST(G)
2	28	Liaq Hussain	GHS Malana	20-03-1970	01-09-2003	BA/B.Ed	-do-
3	29	Baqir Hussain	GHS Borki	01-04-1969	01-09-2003	BA/B.Ed	-do-
4	30	Noor Zaman	GHS Pewar	01-04-1971	01-09-2003	BA/B.Ed	-do-
5	31	Munir Hussain	GHS Luqman Khel	05-05-1969	01-09-2003	BA/B.Ed	-do-
6	32	Muhammad Hanif	GHS Zaran	11-02-1969	01-09-2003	BA/B.Ed	-do-
7	33	Rehman Gul	GCMHS Soddo	12-10-1973	01-09-2003	BA/B.Ed	-do-
8	34	Muhammad Rehman	GHS Bagdad	08-10-1971	01-09-2003	BA/B.Ed	-do-
9	35	Rehmat Noor	GHS Uchut	01-03-1970	01-09-2003	BA/B.Ed	-do-

2. PSHT/SPST/PST TO SST (General) BPS-16

S.No.	S.I. No.	Name of Official	Place of Posting	D/O Birth	Date of Appoint. regular PST	Qualification	Remarks
1	94	S.Bashir Hussain	GPS Speens Malo	30-04-1974	19-09-1998	BA/B.Ed	Services are placed at the disposal of District Education Officer (M) Kurram for further posting against the vacant post of SST(G)
2	98	Abdullah	GPS Tind	09-08-1975	11-05-1999	BA/B.Ed	-do-
3	102	Shamim Gul	GPS Sarkaiwida	20-12-1974	01-06-1999	BA/B.Ed	-do-

3. SAT/AT TO SST (General) BPS-16

S.No.	S.I.No.	Name of Official	Place of posting	D/O Birth	Date of Appoint. regular AT	Qualification	Remarks
1.	31	Abbas Mehdhi	GHS	16-03-1980	12-10-2009	BA/B.Ed	Services are placed at

- 16 -

SST (MALE) KURRAM

the disposal of District
Education Officer (M)
Kurram for further posting
against the vacant post of SST
(G)

		Jelander			
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A. SST/CT TO SST (General) BPS-16

S.No.	Sl. No.	Name of Official	Place of posting	D/O Birth	Date of Appoint. regular CT	Qualification	Remarks
1	49	S. Iqbal Hussain	GMS Ibrahim Zai	21-04-1979	13-12-1999	BA/B.Ed	Services are placed at the disposal of District Education Officer (M) Kurram for further posting against the vacant post of SST(G)

B. S.Qari/Qari TO SST (General) BPS-16

S.No.	Sl. No.	Name of Official	Place of posting	D/O Birth	Date of Appoint. regular Qari	Qualification	Remarks
1	13	S. Wiloyat Hussain	GHS Zerao	22-02-1987	09-12-2009	DA/B.Ed	Services are placed at the disposal of District Education Officer (M) Kurram for further posting against the vacant post of SST(G)

B. SST (Bio/Chem)

1. PSHT/SPST/PST TO SST (BIO/CHEM) BPS-16

S. No.	Sl. No.	Name of Official	Place of posting	D/O Birth	Date of Appoint. regular PST	Qualification	Remarks
1	240	Qasim Muhammad	GPS Palosheen CK	10-05-1984	01-09-2007	BSc/B.Ed	Services are placed at the disposal of District Education Officer (M) Kurram for further posting against the vacant post of SST (Bio/Chem).
2	309	Imdad Ullah	GPS Arwala	26-08-1993	01-11-2016	BSc/B.Ed	Services are placed at the disposal of District Education Officer (M) Kurram for further posting against the vacant post of SST (Bio/Chem) BPS-16 Appointed on Acting Charge Basis.

C. SST (Phy-Maths)

ITEM NO. 1. SCT/CT TO SST (Phy-Maths) BPS-16

S.No.	Sl.No.	Name of Official	Place of posting	D/O Birth	Date of Appoint. regular CT	Qualification	Remarks
1	91	Muhammad Rehman	GCMHS Sadda Lk	25-12-1985	01-03-2013	BSc/B.Ed	Services are placed at the disposal of District Education Officer (M) Kurram for further posting against the vacant post of SST (Ph/Maths).
2	137	Azqib Zaman	GHS Shah Ibrahim Lk	10-02-1986	22-11-2018	B.Sc/B.Ed	Services are placed at the disposal of District Education Officer (M) Kurram for further posting against the vacant post of SST (Bio/Chem) BPS-16 Appointed on Acting Charge Basis.

- 17 -

SST (MALE) KURRAM 3

2. PSHT/SPST/PST TO SST (PHY/MATHS) BPS-16

B. No.	BL No.	Name of Official	Place of Posting	D/O Birth	Date of Appoint. Regular PST	Qualification	Remarks
1	383	Hazal Gul	GPS Sadda LK	03-02-1992	16-10-2017	BSc/B.Ed	Services are placed placed at the disposal of District Education Officer (M) Kurram for further posting against the vacant post of SST (Ph/Maths) BPS-16 Appointed on Acting Charge Basis

Terms and Conditions:-

- They would be on probation for a period of one year extendable for further period of one year.
- They will be governed by such rules and regulations as and when issued from time to time by the Govt.
- Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- Charge report should be submitted to all concerned.
- No TA/DA is allowed for joining the duty.
- They will give an undertaking to be recorded in their Service Book to the effect that if any over payment is made to them in the light of this order, will be recovered, and if they are wrongly promoted, they will be reverted.
- Before handing over the charge, once again their documents may be checked and if they have not the prescribed qualifications as per rules, they may not be handed over charge of the post.
- The prescribed qualifications/documents may be verified from the concerned Universities/ Institutions by the DEO concerned.

(Dr. Iqbal Khan)

Director Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No 27258-64/Promotion to SST's (Male) Kurram

Dated Peshawar the 07/11/2023

Copy forwarded for information and necessary action to the:

- Accountant General Khyber Pakhtunkhwa Peshawar.
- District Education Officer (M) Kurram.
- District Accounts Officer Kurram.
- PS to Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa Peshawar.
- In-charge of EMIS Local Office with the request to upload the Notification on Official wibsite.
- PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- M/ File.

Deputy Director (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

F-

جناب والا حیان دائرہ مکتبہ ریاضیہ کے سینڈری اچھیست خیر خوشخواہ پسدار
عمران اپنی برائے ورگز ریوں الفنا برائے بروڈسٹ ۵۴۷۴ جم ۱۳۹۷

جناب عالی
کراں ۲۰۲۳ء میں ملک عورت کے کمال ہے میں جو DPP ہو گئی اس سائل کا نام
آج صبرکاری کرنے والوں پسپر میں شامل تھا۔ اب جب دوسرے اورڈر نمبر ۲۷۲۵۸
صرصیح ۰۶/۱۱/۲۰۲۳ کو حاصل کیا گی۔ اس اورڈر سے نام درج کیا گی۔
لندن ۲۰۱۷ سے اب تک جتنے بار DPP ہو چکے ہیں۔ وہ فرست ریاستی اورڈر کے ذمہ میں ہو چکے ہیں
اور سوچ لیتے ہوئے ہیں۔ اورڈر کا بھی دوں پسپر حفظ کرے گا۔
لندن ایسی خوبی۔ اجنب سے استبدال ہے۔ کم سائل کا نام دوسریں اورڈر میں شامل کرے
الفنا دیا گا۔

خواص عربی

۱۶-۱۱-
۲۰۲۳ نتھیں

خرچ

ستھر دینی ریجیٹ ۲۱۳۰۲-۰۶۲۱۱۵۸-۹
ریجیٹ نمبر ۸۶ فلم کرم
PSTHIT

0301-8084948

رائیم بخاری

26.06.
16-11-2-3
Ministry of Education
Lahore Office KPK Peshawar

DD/MM/YY
Rahil
16/11/2023

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49 - 19 -

BEFORE THE PESHAWAR HIGH COURT PESHAWAR

WRIT PETITION NO. _____-P/2023

Mr. Sakhi Marjan, PSHT (BPS-15),
GPS Shamkhala Naway Kallay, District Kurram

..... **PETITIONER**



VERSUS

1. The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. The Secretary Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. The Director Elementary and Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
4. District Education Officer (M), District Kurram.

..... **RESPONDENTS**

**WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF
PAKISTAN, 1973 AS AMENDED UPTO DATE.**

R/SHEWETH:

ON FACTS:

**Brief facts giving rise to the present writ petition
are as under:**

1. That petitioner is the law-abiding citizens of Pakistan and are the employees of the respondent department in BPS-14 as PSHT.
2. That the petitioner is high qualified person having M.Ed & M.A Islamiyat. Copies of Educational Testimonials are attached as annexure.....A
3. That the petitioner has initially appointed as PTC (now PST) by the Selection Committee after fulfilling all the codal formalities required for the said post through order dated 01/06/1999. Copy of Appointment order is attached as annexure.....B
4. That the respondent department issued seniority list of PSHT, SPST, PST (Male) of District Kurram, whereby the petitioner was placed at Serial No 84 of the said seniority list. Copy of Seniority list is attached as annexure.....C
5. That the respondent department prepared Working Paper for Promotion to the SST (G) BPS-16 vide dated 19/09/2023, whereby 4 posts from the quota of PST, SPST & PSHT were

WP5362-2023 SAKHIMARJAN VS GOVT OF PAKISTAN.pdf

ATTESTED
EXAMINER
Peshawar High Court
Peshawar

reserved to be promoted under 20% quota to the post of SST (G). That as per the ibid working paper the petitioner was/is at serial No.4 and as such recommended by the authority for the promotion to the post of SST (G). Copy of Working Paper is attached as annexure..... D

6. That the petitioner being top of the seniority list, eligible in all respect to be promoted to the post of SST (G) BPS-16, quite hopeful for his promotion, but astonishingly the respondents issued the impugned Notification dated 07/11/2023, whereby the petitioner has been ignored and his name was dropped from the impugned order without any reason and justification. Copy of the impugned notification dated 07/11/2023 is attached as annexure..... E
7. That the petitioner feeling aggrieved from the impugned notification dated 07/11/2023 preferred departmental appeal/ representation before the competent authority/respondent, but the same has not been responded till date. Copy of the departmental appeal is attached as annexure..... F
8. That feeling aggrieved and having no other remedy the petitioners prefer the instant writ petition on the following grounds amongst other.

GROUND:

- A- That the impugned notification dated 07/11/2023, whereby the petitioner was ignored and not promoted to the post of SST (G) BPS-16 is against the law, facts, norms of natural justice and materials, hence the same is liable to be set aside.
- B- That petitioner has not been treated by the respondents in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.
- C- That according to section 8 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 read with rule 17 of the Khyber Pakhtunkhwa Civil Servant (APT) Rules, 1989 the seniority inter se of a civil servant appointed to service; cadre or post shall be determined in the case of persons appointed by initial recruitment in accordance with the merit assigned by the Commission or as the case may, the department selection committee; provided that persons selected for appointed to post in earlier selection shall rank senior to the persons selected in a later selection.
- D- That the respondent department while issuing the impugned notification dated 07/11/2023, has totally bypassed the

ATTESTED
EXAMINER
Peshawar High Court
Peshawar

settled principles of law, rules & precedents, therefore, the same is not tenable in the eyes of law.

- E- That the treatment meted out to the petitioner is a clear violation of the fundamental rights of the petitioner.
- F- That the respondents despite of the fact that four posts are falling vacant in the 20% promotion quota reserved for PST cadre ignored the petitioner from promotion to the post of SST (G).
- G- That the petitioner has been discriminated by the respondents on the subject noted above and as such the respondents violated the principle of natural justice as well Article 27 of the constitution of the Islamic Republic of Pakistan, 1973.
- H- That according to article 38 (e) of the constitution of the Islamic Republic of Pakistan, 1973, state is bound to reduce disparity in the income of persons in the service of the Pakistan.
- I- That petitioner seeks permission to advance other grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that on acceptance of this writ petition the impugned notification dated 07/11/2023 may kindly be declared as illegal, unconstitutional and ineffective upon the rights of the petitioner and may be rectified/amended to the extent of promoting the the petitioner to the post of SST (G). That the respondents may kindly be directed to consider the petitioner for promotion to the post of SST (G) (BPS-16) w.e.f. 7.11.2023 with all back benefits. Any other remedy which this august Court deems fit that may also be awarded in favor of the petitioner.

Interim relief:

By way of interim relief, the respondents may kindly be directed not to fill the vacant post of SST (G) till the disposal of instant writ petition.

Dated: 22/11/2023

ATTESTED
EXAMINER
Peshawar High Court
Peshawar

PETITIONER

THROUGH:

NOOR MOHAMMAD KHATTAK
Advocate Supreme Court

-22-

UMER FAROOQ MOHMAD

WALEED ADNAN

MAHMOOD JAN
ADVOCATES HIGH COURT

VERIFICATION:

It is verified that no other earlier writ petition was filed between the parties.

mas
DEPONENT

LIST OF BOOKS:

1. CONSTITUTION OF PAKISTAN.
2. SERVICES LAWS BOOK.
3. ANY OTHER CASE LAW AS PER NEED.

g3
CERTIFIED TO BE TRUE COPY

~~EXAMINER
Peshawar High Court, Peshawar
Authorized Under Article 87 of
the Qanoon-e-Shahadat Act 1984~~

04 DEC 2023

-23-

BEFORE THE PESHAWAR HIGH COURT PESHAWAR

WRIT PETITION NO. P/2023

MR. SAKHI MARJAN VS THE GOVT: OF KPK & OTHERS

AFFIDAVIT

I, Sakhi Marjan, S/o Fazal Hameed R/o Thendho Qom Ali Sher Zai Tapha Umar Khel P/O Sada Thendho Tehsil FR Kurram District Kurram Agency, do hereby solemnly affirm that the contents of this **Writ Petition** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.



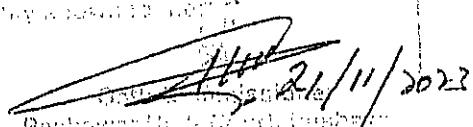
DEPONENT

CNIC NO: 21302-0621158-9

CELL: 0301-8884848
0333-5012711

IDENTIFIED BY:

NOOR MOHAMMAD KHATTAK
Advocate Supreme Court of Pakistan

53830
I declare that the above were verified on date of affirmation before me on this day of Nov 23, 2023.
S/o... Fazal Hameed Sakhi Marjan
Advocate Supreme Court
Who is presenting a copy of this affidavit
21/11/2023
Peshawar High Court, Peshawar


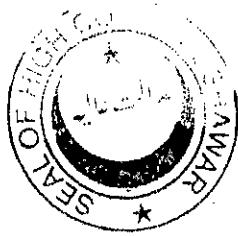
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EXAMINER
Peshawar High Court, Peshawar
Authorized Under Article 87 of
the Qanun-e-Shahadat Act 1984
04 DEC 2023

24

PESHAWAR HIGH COURT PESHAWAR

Form "A"

Order Sheet



Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or that of parties or counsel where necessary
2	3
29.11.2023	<p><u>Writ Petition No. 5362-P/2023.</u></p> <p><u>Present:</u></p> <p>Mr. Noor Muhammad Khattak, Advocate, for the petitioner.</p> <p>Syed Asif Jalal, AAG, for the respondents.</p> <p style="text-align: center;">*****</p> <p><u>S. M. ATTIQUE SHAH, J.-</u> Petitioner, through the instant constitutional petition, has asked for issuance of an appropriate writ directing the respondent-department to consider him for promotion to the post of SST (BPS-16) w.e.f 07.11.2023.</p> <p>2. In essence the petitioner, being serving in the respondent-department as PSHT (BPS-15), is aggrieved from the promotion order bearing No.27258-64/Promotion to SST (Male) Kurram dated 07.11.2023, whereby his other colleagues have been promoted to the post of SST while he has been signaled out.</p> <p>3. Admittedly, the petitioner is a civil servant and the matter in question relates to the terms and conditions of his service enumerated in Chapter-II of the Civil Servants Act, 1973, and as such, the same cannot be agitated before this Court in its writ jurisdiction under Article 199 of the</p>

ATTESTED
EXAMINER
Peshawar High C.
Peshawar

-25-

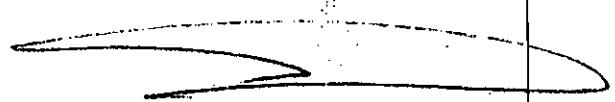
Constitution of Islamic Republic of Pakistan, 1973 in view of the bar contained in Article 212 of the Constitution, therefore, we do not feel persuaded to accede to the prayer of the petitioner which is rather based on some misconception. The petition is, thus, dismissed in *limine*.

Announced

29.11.2023



JUDGE



JUDGE

CERTIFIED TO BE TRUE COPY

EXAMINER
 Peshawar High Court, Peshawar
 Authorized Under Article 8, 7 of
 The Qanoun-e-Shahdat Act 1984

04 DEC 2023

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 04-12-2023
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26 - 100 -

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Appeal

No 1/2024

Sakhi Marjan

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Edu Deptt

(RESPONDENT)
(DEFENDANT)

I/We Sakhi Marjan

Do hereby appoint and constitute **Noor Mohammad Khattak** **Advocate Supreme Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. _____ / _____ /202

CLIENT

ACCEPTED

NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

WALEED ADNAN

UMAR FAROOQ MOHMAD

MUHAMMAD AYUB

MAHMOOD JAN
ADVOCATES

&

OFFICE:

Flat No. (TF) 291-292 3rd Floor,
Deans Trade Centre, Peshawar Cantt.
(0311-9314232)