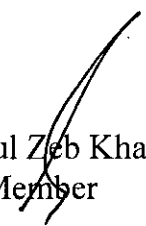


22.05.2017

Counsel for the appellant and Mr. Muhammad Adeel Butt Additional AG for the respondent present. Counsel for the appellant submitted rejoinder which is placed on file. To come up for arguments on 14.09.2017 before D.B.

  
(Gul Zeb Khan)  
Member

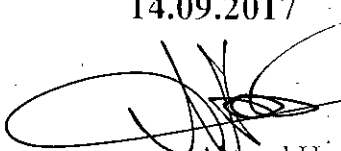
  
(Muhammad Amin Khan Kundi)  
Member

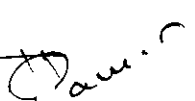
14.09.2017

Learned counsel for the appellant present. Learned Additional Advocate General for the respondents present. Vide separate/common judgment of today of this Tribunal placed on file, appeal No. 911/2015 the present appeal being devoid of any substance is hereby dismissed. Parties are left to bear their own costs. File be consigned to the record room after its completion.

**ANNOUNCED**

14.09.2017

  
(Ahmad Hassan)  
Member

  
(Muhammad Hamid Mughal)  
Member

909/15

01.02.2017

Counsel for the appellant and Addl. AG alongwith Sharifullah, ADO for the respondents present. Written reply not submitted. On the request of learned Addl. AG another last chance is given. To come up for written reply/comments and cost of Rs. 500/- on 07.03.2017 before S.B.

Chairman

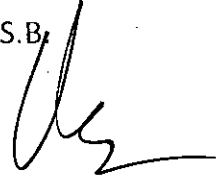
07.03.2017

~~Counsel for the appellant and Addl. AG for the respondents present. Written reply on behalf of respondents No. 1, 2, and 6 submitted. Learned Addl. AG relies on the written statement submitted by respondents No. 1, 2, and 6 on behalf of respondents No. 3, 4, 5, and 7. To come up for rejoinder and arguments on 22.05.2017 before D.B.~~

(MUIHAMMAD AAMIR NAZIR)  
MEMBER

18.08.2016

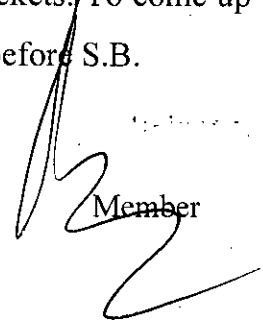
Appellant in person and Mr. Sharifullah, ADO alongwith Addl. AG for respondents present. Written reply not submitted. Requested for adjournment. Request accepted. To come up for written reply/comments on 31.10.2016 before S.B.



Member

31.10.2016

Counsel for the appellant and Mr. Sharifullah, ADO AD (Litigation) alongwith Addl. AG for respondents present. Written reply not submitted despite last opportunity. Requested for further adjournment. Last opportunity further extended subject to payment of cost of Rs. 500/- which shall be borne by respondents from their own pockets. To come up for written reply/comments on 29.12.2016 before S.B.



Member

29.12.2016

Counsel for the appellant and Addl, AG for the respondents present. Addl. AG informed the Tribunal that representative of the respondents met an accident while coming from Lakki Marwat. As such proceedings are adjourned for written statement and cost of Rs. 500/- to 01.02.2017 before S.B.



Chairman

24.12.2015

Since 24.12.2015 has been declared as Public Holiday therefore,  
the case is adjourned to for the same 1.3.2016.

  
Reader

01.03.2016

Counsel for the appellant, M/S Sharifullah, ADO and Khurshid Khan, SO alongwith Addl: A.G for respondents present. Written reply not submitted. Requested for adjournment. Last opportunity granted. To come up for written reply/comments on 9.5.2016 before S.B.

  
Chairman

09.05.2016

Agent of counsel for the appellant and Mr. Khursheed Khan, SO alongwith Asstt. AG for the respondents present. Written reply not submitted despite last opportunity. Requested for further adjournment. Last opportunity extended subject to payment of cost of Rs. 500/- which shall be borne by the respondents from their own pockets. To come up for written reply/comments and cost on 18.08.2016.

  
Chairman

23.09.2015

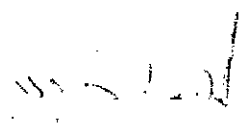
Agent of counsel for the appellant present. Seeks adjournment.  
Adjourned to 1.10.2015 for preliminary hearing before S.B.

  
Chairman


01.10.2015

Counsel for the appellant present. Seeks adjournment. Adjourned  
to 13.10.2015 for preliminary hearing before S.B.

  
Chairman

  
13.10.2015

Counsel for the appellant present. Learned counsel for the  
appellant argued that the appellant was initially appointed as CT (M)  
vide office order dated 25.2.2011 and that on the basis of the said  
order, he joined service but latter on terminated from service vide  
order dated 14.3.2011 which was challenged before the august  
Peshawar High Court Bunu Bench and which was accepted vide  
judgment dated 5.12.2012 and that on the basis of the said judgment  
appellant was appointed vide order dated 1.12.2012 with effect from  
initial date of appointment i.e 25.2.2011.

  
That the appellant was entitled to be enlisted in the seniority  
list with effect from the date of initial appointment but he was  
deprived of his right and was given sonority with effect from 1.12.2012  
regarding appellant preferred departmental appeal on 2.4.2015 which  
was not responded and hence the instant service appeal on 29.7.2015.

That the appellant is entitled to the sonority with effect from  
the date of his initial appointment i.e 25.2.2011.

Points urged need consideration. Admit. Subject to deposit of  
security and process fee within 10 days, notices be issued to the  
respondents for written reply/comments for 24.12.2015 before S.B.

  
Chairman

Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 909/2015


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	13.08.2015	<p>The appeal of Mr. Naqeebullah resubmitted today by Mr. Shah Faisal Ilyas Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR -</p>
2	24-8-15	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>25-8-15</u></p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p>
3	25.08.2015	<p>None present for appellant. The appeal be relisted for preliminary hearing for 2.9.2015 before S.B.</p> <p style="text-align: right;"><i>[Signature]</i> Chairman</p>
4	02.09.2015	<p>None present for appellant. Notice be issued to counsel for the appellant for 23.9.2015 for preliminary hearing before S.B.</p> <p style="text-align: right;"><i>[Signature]</i> Chairman</p>

The appeal of Mr. Naqeebullah Khan C.T GMS Sattar Battani Distt. Lakki Marwat received to-day i.e. on 29.07.2015 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of impugned seniority list is not attached with the appeal which may be placed on it.
- 2- Seven more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.


No. 1121 /S.T,

Dt. 30/7/2015

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Shah Faisal Ilyas Adv. Pesh.

Respected sir,  
objections has been clarified  
and re-submitted on 13/8/2015

↓  


**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE  
TRIBUNAL, PESHAWAR**

Service Appeal No. 909 /2015

Naqeeb Ullah Khan.....(Appellant)

**V E R S U S**

Executive District Officer, Elementary & Secondary Education,  
Lakki Marwat and others.....(Respondents)

**I N D E X**

S.No	Description of Documents	Annex	Pages
1.	Memo of Appeal		1-7
2.	Affidavit		8
3.	Addresses of the Parties		9
4.	Copy of advertisement	A	10
5.	Copies of merit list, minutes of meeting and appointment order	B	11-16
6.	Copy of Medical Certificate	C	17
7.	Copy of order of EDO	D	18
8.	Copy of W.P. and Judgment	E	19-27
9.	Copy of 2 <sup>nd</sup> Appointment Order	F	28
10.	Copy of 2 <sup>nd</sup> Medical Fitness Certificate	G	29
11.	Copy of charge slip	H	30
12.	Copy of office order of Additional Registrar/ HCJ & Departmental Appeal	I	31-37
13.	Wakalat Nama & Seniority list		38-49

Appellant *Naqeeb*

Through *Faisal*

*29/07/*  
Dated: *25/12/*2015

**Shah Faisal Ilyas**  
Advocate High Court,  
Peshawar.  
Office: LG-137-A,  
Deans Plaza, Peshawar  
Cantt.  
Cell No. 0333-9037904



**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. 909 /2015

**K.W.P. Provincial  
Service Tribunal**  
Diary No. 895  
Dated 29-7-2015

Naqeeb Ullah Khan C.T (M) Posted at Government Middle School, Sattar Bettani, Post Office Tajori, Tehsil and District Lakki Marwat.....(Appellant)

**V E R S U S**

1. Executive District Officer, Elementary & Secondary Education, Lakki Marwat.
2. District Officer (M) Elementary & Secondary Education, Lakki Marwat.
3. Government of Khyber Pakhtunkhwa, through Secretary Education Department, Civil Secretariat, Peshawar.
4. Director Schools and Literacy Department, Dabgari Garden, Khyber Pakhtunkhwa, Peshawar.
5. Secretary Schools and Literacy Department, Civil Secretariat, Peshawar.
6. District Accounts Officer, Lakki Marwat.
7. A.D.O Elementary & Secondary Education, Near P.O. Tajazai Town, Lakki Marwat.....(Respondents)

**APPEAL UNDER SECTION 4 OF KHYBER PUKHTUNKHWA SERVICE TRIBUNAL ACT 1974, AGAINST THE RESPONDENTS IN WHICH APPELLANT WAS DEPRIVED FROM SENIORITY WHICH SHOULD BE GRANTED FROM 25/02/2011 AND THE ARREARS/SALARIES AGAINST THE SENIORITY IS DUE AGAINST THE DEPARTMENT.**

Filed to-  
Registrar

29/7/15

re-submitted to-day  
and filed.

Registrar

13/8/15

**Respectfully Sheweth:**

1. That on 11/05/2010 respondent's department given an advertisement in daily "AAJ" C.T General (Male), so being eligible and qualified for the post, appellant applied for the same. (Copies of advertisement is attached as annexure "A").
2. That after conducting test on 07/06/2010 and interview on 15/06/2010 respondent's department issued order of appointment on 25/02/2011 after the meeting of District Selection Board on 24/02/2011 in which appellant name is visible. (Copies of merit list, minutes of meeting and appointment order are attached as annexure "B").
3. That one month time was given for taking the charge but in the meanwhile on 28/02/2011 E.D.O was transferred and appellant obtained Medical Fitness Certificate from District Headquarter Hospital, Lakki Marwat. (Copy of Medical Certificate is attached as annexure "C").
4. That on 10<sup>th</sup> March 2011 appellant went to school for joining, it is worth mentioning to note here that arrival to school is within stipulated time mentioned in the order.

5. That Headmaster of the School was not present and acting Headmaster order appellant to sign in attendance register and appellant did so, and Headmaster assures appellant that your arrival is done in due course.
6. That the appellant properly and regularly made attendance in attendance register and perform their duty with devotion.
7. That on 14/03/2011 appellant come a cross a problem of arrival, because EDO issued an order with regard of some irregularity, by that respondents stopped the salary of the appellant. (Copy of order of EDO is attached as annexure "D").
8. That in the month of October 2011, appellant filed a Writ Petition before the Hon'ble Peshawar High Court, Bannu Bench, which was disposed off on 05/12/2012 in appellant favour. (Copy of Writ Petition and Judgment is annexed as annexure "E").
9. That the appellant was reinstated by the Department and also condemned the attitude of the respondents, consequent upon which the respondents issued 2<sup>nd</sup> Appointment Orders on 17/12/2012 to the appellant.

(Copy of 2<sup>nd</sup> Appointment order is annexed as annexure "F").

10. That on 07/12/2012, once again appellant applied for another Medical Fitness Certificate which was granted accordingly. (Copy of 2<sup>nd</sup> Medical Fitness Certificate is attached as annexure "G").
11. That on 07/12/2012 appellant took the charge vide endorsement No. 161-166 dated 07/12/2012, within stipulated time now serving in the department/ school. (Copy of charge slip is attached as annexure "H").
12. That the appellant came to know about the seniority list, in which the appellant his 2<sup>nd</sup> joining was considered for that, despite the fact that the order was set aside by the Hon'ble Peshawar High Court, Bannu Bench.
13. That appellant file a Writ Petition before the Hon'ble Peshawar High Court, which was returned with the objection to approach the concerned Tribunal/ Proper Forum. (Copy of office order of Additional Registrar/ HCJ is attached as annexure "I")
14. That appellant applied time and again to the high-up's/ respondents for redressal of his grievances with regard of seniority, Here it is pertinent to mention that the

appellant file departmental appeal, but without any fruitful result, till date, hence the instant Service Appeal on the following grounds amongst other inter alia:

**GROUND:**

- A. That the act of the respondents for not granting seniority/ salaries to the appellant is against facts, law and procedure, hence, untenable being unjust and unfair.
- B. That the appellant was not treated in accordance with law and rules, thus acted in violation of the relevant laws laid down for this purpose.
- C. That no show cause notice whatsoever have been issued by the respondents for not granting such relief despite the fact that original appointment of the appellant is of that of 25/02/2011, the whole departmental proceedings were initiated by respondents illegally and unlawfully without observing the legal codal formalities as required.
- D. That the respondents have taken a unilateral action at the back of the appellant. Despite the fact that almost all were giving seniority from the back date. The appellant

has not been afforded an opportunity of being heard and thus he has been condemned unheard and thus the settled principles of natural justice have been violated.

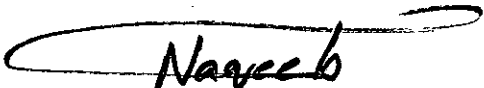
- E. That as mentioned as earlier stated of this Service Appeal, that the act of the respondents is based on malafide and the appellant is the only scapegoat who have been deprived of their due rights illegally, unlawfully and mechanically by the respondents/ department and thus they have been discriminated by the department/ respondents by violating Article 25 of the Constitution of Pakistan 1973.
- F. That the appellant is regular Civil Servant and has rendered sufficient service in the department with unblemished service record and he could not be deprived of his due right without observing/ fulfilling the legal formalities and thus the action taken by the respondents/ department against the appellant is based on malafide. The appellant is been deprived from giving seniority from 25/02/2011 and if possible the salaries against that.
- G. That the conduct of the respondents is against the rules/ regulation of service and in violation of the established

principles of equity and justice, calling for intervention by the Hon'ble ~~Court~~ Tribunal.

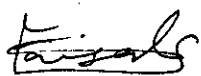
- H. That by not issuing such order of the appellant, shows classical examples of political victimization.
- I. That the appellant seek leave of this Hon'able Tribunal to rely on additional grounds at the time of final hearing/arguments.

It is, therefore, most humbly prayed that on acceptance of this Service Appeal, this Hon'ble Tribunal may graciously be pleased to direct the respondents that:

- i. Seniority of the appellant be considered from 25/02/2011
- ii. That the salaries be also given from 25/02/2011 up to 07/12/2012.
- iii. Any other order deem proper may also be given/issue in favour of appellant.

  
Appellant

Through

  
**Shah Faisal Ilyas**  
Advocate High Court,  
Peshawar.

29/07/  
Dated: 23/02/2015

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2015

Naqeeb Ullah Khan.....(Appellant)

**V E R S U S**

Executive District Officer, Elementary & Secondary Education,  
Lakki Marwat and others.....(Respondents)

**AFFIDAVIT**

I, **Shah Faisal Ilyas**, Advocate Peshawar, do hereby as per information conveyed to me by my client solemnly affirm and declare that the contents of the **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



*Faisal*  
**ADVOCATE**



9.

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE  
TRIBUNAL, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2015

Naqeeb Ullah Khan.....(Appellant)

**V E R S U S**

Executive District Officer, Elementary & Secondary Education,  
Lakki Marwat and others.....(Respondents)

**ADDRESSES OF THE PARTIES**

**APPELLANT:**

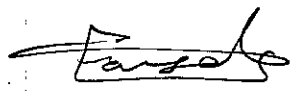
Naqeeb Ullah Khan C.T (M) Posted at Government Middle School, Sattar Bettani, Post Office Tajori, Tehsil and District Lakki Marwat.

**RESPONDENTS:**

1. Executive District Officer, Elementary & Secondary Education, Lakki Marwat.
2. District Officer (M) Elementary & Secondary Education, Lakki Marwat.
3. Government of Khyber Pakhtunkhwa, through Secretary Education Department, Civil Secretariat, Peshawar.
4. Director Schools and Literacy Department, Dabgari Garden, Khyber Pakhtunkhwa, Peshawar.
5. Secretary Schools and Literacy Department, Civil Secretariat, Peshawar.
6. District Accounts Officer, Lakki Marwat.
7. A.D.O, Lakki Marwat, *Near Post office Tajazai Town.*

  
Appellant

Through

  
**Shah Faisal Ilyas**  
Advocate High Court,  
Peshawar.

29/07/  
Dated: 26/07/2015



## Tentative Open Merit list of CT (MALE) CANDIDATES interviewed on 15-6-2010

S No	R.No	Name	Father Name	D.OB	SSC			FA			BA			MA			CT			Session	Exp	T. Score	Remarks
					Obt.	Total	Score	Obt.	Total	Score	Obt.	Total	Score	Obt.	Total	Score	Obt.	Total	Score				
1	182	Laiq Shah	Nabi Shah	2/2/1984	674	850	19.824	789	1100	17.93	336	550	6.11	1610	2400	6.7	886	1200	18.458	2008	2	71.0311	
2	875	Naqib Ullah	Muhammad Zaman	20-9-1983	643	850	18.912	728	1100	16.55	380	550	6.91	1507	2400	6.3	811	1200	16.896	2007	5	70.5413	
3	350	Dilwar Shah	Kalim Shah	4/10/1973	670	850	19.706	694	1100	15.77	670	900	7.44	796	1000	8	757	1200	15.771	2007	3	69.6538	
4	380	Abdul Majeed	Abdul Hamid	19-3-1984	640	850	18.824	751	1100	17.07	347	550	6.31	1447	2400	6	833	1200	17.354	2007	3	68.58414	
5	604	Mahmood Ali Khan	Maz Ullah Khan	7/12/1982	588	850	17.294	753	1100	17.11	347	550	6.31	1511	2400	6.3	785	1200	16.354	2006	5	68.36584	
6	115	Noor Aslam	Gul Hasan	15-1-1979	572	850	16.824	673	1100	15.3	293	550	5.33	481	800	6	955	1200	19.896	2005	5	68.3545	
7	200	Mir Wafi Khan	Abdul Alim Khan	2/2/1977	609	850	17.912	670	1100	15.23	306	550	5.56	641	1100	5.8	881	1200	18.354	2005	5	67.89411	
8	400	Habib ur Rahman	Saif Ullah Khan	10/10/1983	618	850	18.176	729	1100	16.57	334	550	6.07	1549	2400	6.5	660	900	18.333	2005	2	67.6045	
10	273	Arab Khan	Adam Khan	3/25/1983	648	850	19.059	734	1100	16.68	384	550	6.98	847	1200	7.1	854	1200	17.792	2009		67.5724	
11	208	Dil Nawaz Khan	Gul Nawaz Khan	9/9/1979	575	850	16.912	705	1100	16.02	381	550	6.93	1313	2000	6.6	766	1200	15.958	2006	5	67.3651	
12	179	Farman Ullah Gohar	Mir Aslam Khan	4/11/1983	584	850	17.176	806	1100	18.32	396	550	7.2	1926	3000	6.4	875	1200	18.229	2008		67.34352	
13	399	Tariq Hamid	Abdul Hamid	3/5/1983	611	850	17.971	743	1100	16.89	334	550	6.07	514	900	5.7	896	1200	18.667	2008	2	67.3074	
14	617	Mati Ullah	Muhammad Nasim	15-3-1979	587	850	17.265	679	1100	15.43	295	550	5.36	636	1100	5.8	884	1200	18.417	2005	5	67.25955	
15	623	Saif ur Rahman	Abdul Sattar	7/3/1985	620	850	18.235	683	1100	15.52	385	550	7	727	1200	6.1	877	1200	18.271	2009	2	67.08719	PST.
16	809	Nadeem ul Islam	Riaz ul Islam	2/4/1976	635	850	18.676	789	1100	17.93	722	900	8.02	591	1100	5.4	819	1200	17.063	2001		67.06574	
17	214	Muhammad Arif Khan	Falak Naz Khan	20-3-1976	628	850	18.471	713	1100	16.2	275	550	5	571	900	6.3	863	1200	17.979	2007	3	66.99874	
18	859	Saif ur Rahman	Raza Khan	8/10/1981	602	850	17.706	678	1100	15.41	312	550	5.67	660	1100	6	618	900	17.167	2007	5	66.95437	
19	272	Shafi Ullah	Qazi Khan	12/10/1975	593	950	17.588	669	1100	15.2	345	550	6.27	1237	2000	6.2	800	1200	16.667	2009	5	66.91717	
20	191	Abdur Rauf	Akbar Zaman	6/3/1984	608	850	17.882	799	1100	18.16	330	550	6	1441	2000	7.2	847	1200	17.646	2009		66.89225	
21	360	Muhammad Farooq	Falak Sher	26-10-1976	581	850	17.088	667	1100	15.16	401	550	7.29	682	1100	6.2	771	1200	16.063	2006	5	66.80074	
22	328	Zar Wafi Khan	Khan Zaman	4/2/1975	602	850	17.706	685	1100	15.57	375	550	6.82	741	1100	6.7	713	1200	14.854	2002	5	66.6827	
23	501	Sami Ullah Khan	Ali Muhammad Khan	1/16/1979	616	850	18.118	700	1100	15.91	289	550	5.25	664	1100	6	880	1200	18.333	2005	3	66.6509	
24	608	Qudrat Ullah	Fouj Dar Khan	9/5/1982	589	850	17.324	771	1100	17.52	286	550	5.2	685	1100	6.2	828	1200	17.25	2007	3	66.52353	
25	162	Abid Hussain	Muhammad Anwar	6/11/1983	659	850	19.392	702	1100	15.95	378	550	6.87	1554	2300	6.8	741	1200	15.438	2006	2	66.40365	
26	393	Ikram Ullah Khan	Amir Payo Khan	2/24/1981	619	850	18.206	713	1100	16.2	3400	4500	7.56	1650	2000	8.3	774	1200	16.125	2007		66.3409	N.C.H.D
27	784	Muhammad Israr	Muhammad Ibrahim	3/9/1985	646	850	19	742	1100	16.86	365	550	6.64	1511	2150	7	803	1200	16.729			66.25707	
28	319	Qudrat Ullah Khan	Khan Momin	3/5/1979	545	850	16.029	683	1100	15.52	309	550	5.62	660	1100	6	866	1200	18.042	2005	5	66.21199	
29	345	Samar Gul	Muhammad Ismail	20-1-1986	629	850	18.5	667	1100	15.16	389	550	7.07	1484	2000	7.4	862	1200	17.958	2009		66.11015	
30	483	Ishan Ullah	Sakhi Jan	30-3-1985	551	850	16.206	761	1100	17.3	374	550	6.8	786	1200	6.6	924	1200	19.25	2009		66.10134	
31	878	Gul Tiaz Khan	Taimar Khan	10/1/1984	628	850	18.471	789	1100	17.93	367	550	6.67	825	1200	6.9	581	900	16.139	2005		66.08902	
32	282	Jalal ud Din	Mir Shah Jehan	10/5/1985	621	850	18.265	734	1100	16.68	368	550	6.69	754	1200	6.3	872	1200	18.167	2009		66.08743	
33	539	Parvez Kamal	Abdur Rahim Khan	1/1/1982	586	850	17.235	629	1100	14.3	360	550	6.55	1265	1900	6.7	878	1200	18.292	2007	3	66.02576	
34	750	Umar Jan	Muhammad Hassan	30-1-1981	556	850	16.353	669	1100	15.2	330	550	6	1343	2400	5.6	853	1200	17.771	2005	5	65.92415	
35	251	Muhammad Zaman	Gul Zaman	20-3-1981	600	850	17.647	609	1100	13.64	334	550	6.07	1192	1900	6.3	914	1200	19.042	2007	3	65.87605	
36	642	Irfan Ullah	Azad Khan	15-4-1988	608	850	17.882	771	1100	17.52	343	550	6.24	3	4	7.5	602	900	16.722	2007		65.86367	
37	445	Minir Khan	Allas Khan	9/12/1978	528	850	15.529	675	1100	15.34	334	550	6.07	619	1100	5.6	875	1200	18.229	2005	5	65.79949	

274	Jamshed Iqbal	Muhammad Iqbal Khan	4/2/1985	614	850	18.059	786	1400	14.04	840	140												
35	279	Muhammad Asghar Khan	Rehmat Ullah	2/25/1984	605	850	17.794	686	1100	15.59	347	550							2008				
40	876	Abdur Rashid	Mehboob Alam	16-1-1972	616	850	18.118	651	1100	14.8	429	700						15.729	1999	5	65.125		
41	573	Ishan Ullah Khan	Abdullah Khan	2/10/1984	604	850	17.765	779	1100	17.7	352	550						16.472	2007		65.71647		
42	421	Afamgir Khan	Noor Aslam Khan	3/10/1985	614	850	18.059	679	1100	15.43	369	550	6.71	1902	2600	7.3		18.146	2009		65.66095		
43	802	Shoukat Ali	Abdul Hamid	4/21/1976	615	850	18.118	648	1100	14.73	330	550	6	678	1100	6.2	751	1200	15.646	2002	5	65.65439	
44	762	Shaukat Ali	Akhtar Ali	1/1/1983	593	850	17.441	713	1100	16.2	370	550	6.73	1534	2400	6.4	809	1200	16.854	2007	2	65.61883	
45	565	Matiullah	Niamat Ullah	26-12-1972	566	850	16.647	547	1100	12.43	3.23	4	8.08	3.62	4	9.1	757	1200	16.396	2007	3	65.59971	
46	647	Salim Ullah	Muhammad Saeed	9/8/1979	593	850	17.441	672	1100	15.27	353	550	6.42	674	1100	6.1	732	1200	15.25	2004	5	65.50936	
47	310	Farman Ullah Khan	Abdul Hamid	1/1/1980	655	850	19.265	837	1100	19.02	282	550	5.13	1216	2100	5.8	777	1200	16.188	2006		65.39268	Ma
48	178	Atta ur Rahman	Sarfraz Khan	4/12/1973	660	850	19.412	555	1100	12.61	314	550	5.71	1106	2000	5.5	822	1200	17.125	1999	5	65.38949	
49	756	Shaista Zaman	Gul Rehman	10/1/1978	523	850	15.382	751	1100	17.07	313	550	5.69	948	1700	5.6	794	1200	16.542	2004	5	65.25958	
50	140	Faizan Ahmad Khan	Amir Nawaz Khan	4/4/1980	560	850	16.471	685	1100	15.57	297	550	5.4	723	1100	6.6	874	1200	18.208	2007	3	65.21983	
51	618	Ishad Ullah Khan	Muhammad Azim	2/6/1979	548	850	16.118	687	1100	15.61	684	900	7.6	850	1000	8.6	828	1200	17.25	2005		65.18128	
52	599	Ishan Ullah Khan	Faiz Ullah Khan	4/12/1983	592	850	17.412	711	1100	16.15	373	550	6.78	1315	2000	6.6	876	1200	18.25	2008		65.17767	
53	183	Amjad Ali Khan	Mirza Ali Khan	25-3-1985	627	850	18.441	672	1100	15.27	320	550	5.82	1416	2300	6.2	839	1200	17.479	2008	2	65.16777	
54	207	Kalim Ullah Khan	Muhammad Hasim	2/9/1985	635	850	18.676	700	1100	15.91	330	550	6	1683	2250	7.5	820	1200	17.083	2009		65.14889	
55	198	Khial Muhammad	Yar Muhammad	3/3/1980	612	850	18	680	1100	15.45	285	550	5.18	552	1100	5	755	1200	16.354	2005	5	65.00871	
56	150	Muhammad Abdul Aadil	Muhammad Yousef Khan	2/9/1983	582	850	17.118	666	1100	15.14	366	550	6.65	1855	2400	7.7	878	1200	18.292	2008		64.92939	
57	250	Muhammad Qasim	Muhammad Ramzan	1/1/1979	580	850	17.059	732	1100	16.64	287	550	5.22	675	1100	6.1	529	900	14.694	1999	5	64.74418	
58	323	Mir Shahb Khan	Abbas Khan	8/2/1983	534	850	15.706	692	1100	15.73	323	550	5.87	356	800	4.6	851	1200	17.729	2008	5	64.61005	CT Certificate
59	195	Shah Wali Khan	Abdul Manan	17-3-1982	615	850	18.088	659	1100	15.2	342	550	6.22	1154	1900	6.1	816	1200	17	2007	2	64.58465	
60	395	Naseer Ahmad	Rustam Khan	26-3-1983	595	850	17.5	671	1100	15.25	387	550	7.04	1440	2000	7.2	839	1200	17.479	2009		64.46553	
61	516	Akbar Jan	Amir Jan	11/1/1985	615	850	18.088	728	1100	16.55	335	550	6.09	1329	2150	6.2	832	900	17.556	2008		64.46155	
62	601	Muhammad Farooq	Syed Jalal	1/1/1983	515	850	15.147	740	1100	16.82	414	550	7.53	783	1200	6.5	833	1200	18.396	2009		64.41335	Qari
63	304	Hamid Ullah Khan	Saad Ullah Khan	1/10/1983	552	850	16.235	723	1100	16.43	355	550	6.45	1412	2000	7.1	874	1200	18.208	2009		64.38999	
64	685	Khalid Hameed	Abdul Hameed	4/2/1985	613	850	18.029	687	1100	15.61	341	550	6.2	1503	2400	6.3	877	1200	18.271	2009		64.37638	
65	209	Saif Ullah Khan	Ghulam Rabbnai	18-2-1979	564	850	16.588	623	1100	14.16	358	550	6.51	1208	2000	6	771	1200	16.063	2006	5	64.35892	
66	448	Abdul Rehman	Khair Ahmad	15-11-1973	527	850	15.5	639	1100	14.52	312	550	5.67	696	1100	6.3	832	1200	17.333	1996	5	64.35606	
67	636	Sher Dawood	Sakhi Jan	15-2-1980	617	850	18.147	691	1100	15.7	374	550	6.8	1548	2400	6.5	826	1200	17.208	2007		64.30994	
68	103	Latif Ullah Khan	Sakhi Jan	7/2/1978	535	850	15.735	644	1100	14.64	298	550	5.42	1215	2000	6.1	836	1200	17.417	2005	5	64.28151	
69	505	Bahadar Khan	Abdullah Jan	3/3/1982	617	850	18.147	736	1100	16.73	344	550	6.25	1530	2400	6.4	602	900	16.722	2007		64.2261	
70	422	Farman Ullah	Saranjam Khan	21-1-1980	610	850	17.941	731	1100	16.61	366	550	6.65	420	900	4.7	879	1200	18.313	2009		64.18852	PST.
71	342	Safi Ullah	Saadullah	1/9/1985	650	850	19.118	676	1100	15.36	279	550	5.07	516	900	5.7	904	1200	18.833	2009		64.12068	
72	245	Zahid Ullah	Zer Muhammad	11/5/1981	601	850	17.676	660	1100	15	336	550	6.11	676	1100	6.1	919	1200	19.146	2005		64.07685	
73	259	Muhammad Jamil	Sadi Khan	4/11/1978	593	850	17.441	655	1100	14.89	247	550	4.49	689	1100	6.3	767	1200	15.979	2004	5	64.06125	
74	572	Ghulam Akbar	Ali Akbar Khan	3/5/1984	625	850	18.382	719	1100	16.34	358	550	6.51	1447	2150	6.7	770	1200	16.042	2007		64.00425	
75	300	Inayat ur Rahman	Faiz Muhammad	4/4/1972	640	850	18.824	598	1100	13.59	388	550	7.05	439	900	4.9	702	1200	14.625	2002	5	63.97176	
76	267	Hameed Ullah Khan	Akbar Ali Khan	1/1/1975	637	850	18.735	634	1100	14.41	263	550	4.78	648	1100	5.9	821	1200	17.104	2006	3	63.92128	
77	109	Sardar Khan	Muhammad Azam	15-11-1972	632	850	18.588	620	1100	14.09	259	550	4.71	531	1100	5.3	585	900	16.25	1995	5	63.92005	
78	559	Afamgir Khan	Muhammad Hasim	30-3-1976	572	850	16.824	569	1100	12.93	354	550	6.44	1110	1900	5.8	809	1200	16.854	2001	5	63.88798	

008 2 65 71343  
65 76912

13

S.No	R.No	Name	Father Name	D.OB	SSC			FA			BA			MA			CT			Session	Exp	T. Score	Remarks
					Obt:	Total	Score	Obt:	Total	Score	Obt:	Total	Score	Obt:	Total	Score	Obt:	Total	Score				
79	620	Muhammad Yaqoob	Sarfaraz Khan	25-1-1975	575	850	17	611	1100	13.82	299	550	5.436	709	1100	6.445	580	900	16.111	2004	5	63.8792929	
80	637	Abdul Manan	Gul Sarwar	21-2-1973	619	850	18.206	589	1100	13.39	290	550	5.273	703	1100	6.391	562	900	15.611	2000	5	63.8669935	
81	293	Alaud Din	Saifud Din	09/07/1978	565	850	16.618	602	1100	13.68	323	550	5.873	1507	2400	6.279	590	900	16.389	1998	5	63.8402481	Ser Crit
82	333	Muhammad Ziaulhaq	Abdul Majeed	28-7-1984	624	850	18.353	681	1100	15.48	323	550	5.873	1448	2400	6.033	867	1200	18.063	2009		63.7987745	
83	376	Muhammad Samood	Ghaiz Ullah Khan	16-9-1971	630	850	18.529	743	1100	16.89	310	550	5.636	436	900	4.844	763	1200	15.895	2003	2	63.7924168	
84	173	Gul Muhammad Yousaf	Amir Muhammad	17-9-1955	590	850	17.353	679	1100	15.43	385	550	7	1588	2100	7.562	592	900	16.444	2007		63.7911086	
85	241	Muhammad Jamil	Ali Mar Jan	15-2-1981	552	850	16.235	681	1100	15.48	361	550	6.382	560	1100	5.091	747	1200	15.563	2005	5	63.7477941	
86	231	Wali Rehman	Saif ur Rahman	02/05/1974	590	850	17.353	2020	3400	14.85	219	550	5.436	662	1100	6.018	543	900	15.083	2002	5	63.7437611	
87	120	Rahmat Ullah Khan	Inyat Ullah Khan	15-2-1978	561	850	16.5	662	1100	15.05	251	550	4.927	720	1100	6.545	849	1200	17.688	2007	3	63.7056818	
88	471	Ashraf Ali	Muhammed Ali	22-10-1978	523	850	15.382	647	1100	14.7	258	550	4.709	597	1100	5.427	865	1200	18.438	2005	5	63.660762	
89	537	Farman Ullah	Ghulam Akbar	30-10-1955	544	850	16	688	1100	15.64	381	550	6.927	786	1100	7.145	648	900	17.944	2009		63.6535354	Lecturer
90	127	Rustam Khan	Abdul Majeed	03/04/1972	549	850	16.147	770	1400	13.75	243	550	4.509	682	1100	6.2	647	900	17.972	1999	5	63.578372	
91	231	Muhammad Sharif	Habib Ullah Khan	30-7-1970	545	850	16.059	453	750	15.1	908	1650	5.503	461	800	5.763	772	1200	16.083	2003	5	63.5076872	
92	625	Siraj ud din	Habib Khan	04/06/1972	634	850	18.647	569	1100	12.93	339	550	6.145	598	1100	5.436	736	1200	15.333	2004	5	63.4940285	
93	433	Zia ur Rehman	MirHawas Khan	11/10/1981	574	850	16.882	701	1100	15.93	375	550	6.818	1533	2300	6.665	824	1200	17.167	2009		63.464237	
94	131	Sanu Ullah	Ghulam Faqeer	18-10-1983	575	850	16.912	627	1100	14.25	311	550	6.2	703	1100	6.391	634	900	17.611	2008	2	63.3637849	
95	227	Muhammad Haroon	Mumtaz Khan	13-4-1984	584	850	17.176	687	1100	15.61	305	550	5.545	1464	2100	6.971	648	900	18	2010		63.3059901	
96	740	Niamat Ullah Khan	Najeeb Ullah Khan	20-4-1978	564	850	16.588	632	1100	14.36	284	550	5.164	923	1700	5.429	804	1200	16.75	2005	5	63.2949198	
97	266	Tehseen Ullah Khan	Mamrez Khan	10/03/1979	577	850	16.971	617	1100	14.02	241	550	4.382	645	1100	5.864	805	1200	16.771	2006	5	63.2096034	
98	102	Muhammad Ibrahim Khan	Sakhi Jan	15-3-1976	619	850	18.206	573	1100	13.02	263	550	4.782	1227	2300	5.335	809	1200	16.854	2005	5	63.1993771	
99	643	Sajjad Rauf Qureshi	Abdur Rauf Qureshi	01/06/1976	593	850	17.588	599	1100	13.61	285	550	5.182	660	1100	6	569	900	15.806	2004	5	63.1892454	
100	172	Badar-e-Alam	Shar Azam	13-4-1982	599	850	17.618	691	1100	15.7	357	550	7.218	1326	2000	6.63	765	1200	15.938	2009		63.1078743	

ALLIED  
A. B. Farid

Note: 1. The present merit positions are mere tentative and are subject to change in the response of application received from the candidate(s) or during rechecking.  
2. The copy of the present tentative merit list is not challengeable in any court of justice, to prove one's present merit position as final.  
3. All the candidates are directed to submit their application(s) if any with Mr. Khamdullah jan Computer operator of this office up to 14-07-2011 regarding the Tentative merit list to redress any clerical mistake

**MINUTES OF DSB MEETING FOR APPOINTMENT IN ELEMENTARY & SECONDARY  
EDUCATION DEPT LAKKI MARWAT**

The meeting of District Selection Board, for appointment of various categories of teaching staff has been held on 24/02/2011, under the chairmanship of Executive District Officer E&S Education Deptt: Lakki Marwat. The following attended the meeting.

- |   |          |
|---|----------|
| 1. Noor Hassan Khan Executive District Officer E&S Edu:       | Chairman |
| 2. Muhammad Ayub Khan E&S Education Deptt                     | Member   |
| 3. Representative District Co-ordination Officer Lakki Marwat | Member   |
| 4. Amanullah Head Clerk E&S Edu: Deptt                        | Member   |

The Committee approved the following candidates to be appointed as CT Male BPS-09.

**OPEN MERIT**

1. Laiq Shah S/O Nabi Shah R/O Gandi Khan Khel
2. Naqibullah Khan S/O Muhammad Zaman R/O Umer Abad

**SESSION WISE MERIT**

1. Dilawar Khan S/O Mehr Jan R/O Langer Khel Hindal
2. Abdul Majid Khan S/O Abdul Karim R/O Wanda Lughman Baist Khel
3. Hidayat Ullah S/O Saadullah R/O Umer Tiller Khel
4. Abdul Wahab S/O Muhammad Yousaf Mina Khel
5. Sifat Ullah S/O Asmat Ullah R/O Asmat Abad

**Rtd: Son**

1. Ihsanullah S/O Watay Khan R/O Dallo Khel
2. Munir Khan S/O Atlas Khan R/O Lakki Michan Khel (Ex-Service Me., Quota)

Amanullah  
H/c Local office

Muhammad Ayub Khan  
District Officer (M) E& SE Deptt:  
Lakki Marwat.

Representative District Co-ordination Officer  
Lakki Marwat

Executive District Officer  
E&S Education Deptt: Lakki Marwat.

**ATTESTED**

*E. Sale*

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELE & SEC. EDUCATION DEPTT LAKKI MARWAT  
APPOINTMENT ORDER

Consequent upon the recommendations of District Selection Committee, the appointment of below named candidates is hereby ordered as CT (M) in BPS-09 (3820-230-10720) plus usual allowances as admissible under the rules on regular basis against vacant posts under provision of Establishment & Administration Department circular bearing No. SOR-6(E&AD)13-01/2005 dated 10-08-2005 on the terms & conditions given below in the interest of public service from the date of taking over charge.

OPEN MERIT

S.No	Name	Father name & address	To be posted at	Remarks
1	Laiq Shah	Nabi Shah R/o Gandi Khan Khel	GHS No.1 Tajori	Against Vacant Post
2	Naqibullah Khan	Muhammmad Zaman R/O Umer Abad	GHS No.1 Tajori	-do-

SESSION WISE MERIT

S.No	Name	Father name & address	To be posted at	Remarks
1	Dilawar Khan	Mehr Jan R/O Langer Khel Hindal	GMS Satar Bhattani	Against Vacant Post
2	Abdul Majid Khan	Abdul Karim R/o Wanda Lughman Baist Khel	GHS Khan Khel Mandoza	-do-
3	Hidayatullah	Saadullah R/O Umer Titter Khel	GHS No.1 Taori	-do-
4	Abdul Wahab	Muhammad Yousaf Mina Khel	GHS Wanda Aurangzeb	-do-
5	Sifatullah	Asmat Ullah R/O Asmat Abad	GHSS Lar diwah	-do-

RETIRED SON

S.No	Name	Father name & address	To be posted at	Remarks
1	Ihsanullah	Watan Khan R/O Dallo Khel	GHS No.2 Tajori	Retd; Son
2	Munir Khan	Atlas Khan R/O Lakki Michan Khel	GHSS Abcul Khel	Ex-Service Men Quota

TERMS & CONDITIONS:

1. Their appointment will be considered without pension and gratuity in terms of section 19 of NWFP Civil Servant Act 1973, as amended vide NWFP Civil Servant (Amendment) Act. 2005 but the candidates already working as permanent Govt. Servants, will under take whether they want to continue the benefits of old service or new, they will however be entitled to contributory provident fund in such a manner and such a rate as may be prescribed by Govt.
2. In case of resignation without notice two months pay/allowance will be refunded to Govt.
3. Their services will be governed by such rules and regulations as may be issued by Govt time to time.
4. In case of misconduct they will be proceeded against the civil servant removal from service (special power) ordinance.2000 and rules frame from time to time.
5. Charge reports should be submitted to all concerned
6. No TA/DA is allowed

**ATTESTED**



108

16

7. The undersigned will check and verify the certificates/degrees of above candidates from concerned Boards/Universities before the drawl of their pay.
8. The appointment order is liable to termination, if the candidate failed to take over charge with in 30 days of commencement date.
9. The undersigned reserve the rights of amendment in case of any mistake.
10. They are required to produce health and age certificate from medical superintendent DHQ hospital Lakki Marwat

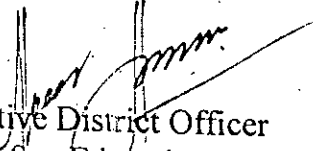
(Noor Hassan Khan)  
Executive District Officer  
Ele: & Sec: Education Deptt  
Lakki Marwat

Dated 25/2/2011

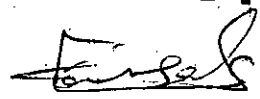
Endst No. 2119-24/CT(M)

Copy to the

1. Director Ele: & Sec: Education Deptt Khyber Pukhtunkhwa, Peshawar
2. District Co-ordination Officer Lakki Marwat
3. District Officer female local office
4. District Accounts officer Lakki Marwat
5. Headmistress school concerned
6. Candidates concerned

  
Executive District Officer  
Ele: & Sec: Education Deptt  
Lakki Marwat

**ATTESTED**



28/02/2011 9:10 AM

17

MEDICAL FITNESS CERTIFICATE.

Name of Official ..... Naqibullah Khan ✓

Religion..... Islam Muslim.....

Father/Husband Name..... Muhammad Zaman ✓

Residence..... Village Umar Abad Tajori ✓

Teh & Distt Lakki Marwat ✓

Dated of Birth..... 1983 (NIC No. 11201-6389046-3) ✓

Exact Height by measurement..... 5'8"

Personal Mark of Identification..... Note on RT done in

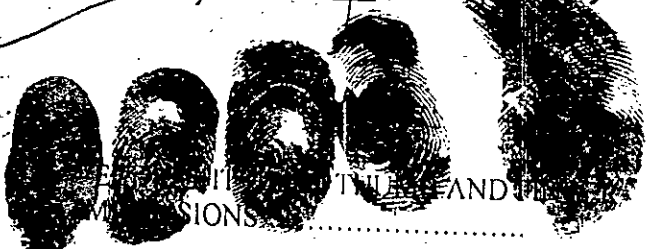
Signature of Official..... [Signature]

Signature of Head of Office.....

Seal of Office.....

I do hereby certify I have examined..... Naqibullah Khan a candidate for employment in the office of the EDO (RFS) Lakki Marwat and can not discover that he/she had any diseases communicable or other constitutional affection or bodily infirmity except.....

I do not consider this as disqualification for employment in the office of the EDO (RFS) Edu Lakki Marwat His/Her age according to his own Statement..... (27) years and by appearance about Twenty Seven years..... )...years.



[Signature] 28/2/11  
Medical Superintendent  
DHQ Hospital Lakki Marwat.  
Medical Superintendent  
DHQ Hospital (Lakki)

ATTACHED

D.Os/D.Os (M/F) Dated 14/3/11

As you know that appointment orders of various categories have been issued and the appointees are trying to take over their charges in the schools.

A large nos. of verbal and written complaints have been received in this regard.

Hence, you are directed to not consider these appointment orders and not submit the source papers to the District Accounts Officer.

Lakki Marwat for starting their pay etc prior the countersignature of the undersigned, <sup>til further</sup> otherwise, you will personally be responsible for the consequences please.

(Maji, Abdul Malik) E.D.O

R.22 D.O (F) 14/3/2011

*[Signature]*

Noted sir: *[Signature]* 14/3/11

*[Signature]* 14/3/11

*[Signature]*

1

19

**IN THE PESHAWAR HIGH COURT BANNU  
BENCH, BANNU**

Writ Petition No. 338-B/2011

Naqibullah Khan S/O Muhammad Zaman (CT  
Teacher) Govt: High School No.1 Tajori, Tehsil and  
district Lakki Marwat

.....:(Petitioners. )

Versus

1. Government of Khyber Pukhtun Khwa through Secretary Education, department, Peshawar.
2. Director Eeementary and Secondary Education KPK Peshawar
3. The District Co-ordination Officer Lakki Marwat.
4. Executive District Officer ( E ) & ( S ) Education, Lakki Marwat.
5. The District Accounts officer Lakki Marwat.
6. Head Master GHS No.1 Tajori.

.....(Respondents )

WRIT PETITION UNDER ARTICLE 199 OF THE  
CONSTITUTION OF THE ISLAMIC REPUBLIC OF  
PAKISTAN, 1973,

**PRAYER:**

On acceptance of instant Writ petition, the respondent No.4 (EDO) may very kindly be directed to allow the petitioner to perform his duty as at Govt: High School No.1 Tajori, as CT teacher and also to release his salary w.e.f 25/2/2011 in view of order passed by the then EDO, (E) & (S) Education, Lakki Marwat, vide his order No.2119-24/CT(M), dated 25/2/2011.

Any other relief deemed fit and appropriate in the circumstances of the case, may also be granted in the best interest of justice.

**INTERIM RELIEF**

Interim relief, in shape of suspension of the advertisement dated 5/10/2011 in respect of readvertisement for the said posts, may also graciously be granted for the sake of justice..

Respectfully Sheweth:

**ATTESTED**

**ATTESTED**  
EXAMINER  
Peshawar High Court,  
Bannu Bench

Additional Registrar

19/10/2011

1) That the petitioner is a bonafide resident of District Lakki Marwat. and on 11-5-2010, the respondent No.4 advertised posts of C.T, General (Male) etc for bonafide residents of district Lakki marwat. (Copy of advertisement dated 11/5/2010 is annexure "A").

2) That having the required qualification and being eligible, the petitioner applied for the said post, whereafter test and interview was conducted and after proper scrutiny tentative merit list was prepared and the petitioner was enlisted at S.No 2 (Copy of tentative open merit list in respect of CT (Male) candidate/petitioner is annexure "B" while his testimonial is annexure B-1.

3) That the petitioner has undergone all the necessary formalities. wherein the medical test was conducted under the supervision of MS, DHQ hospital; Lakki Marwat and Medical fitness certificate was issued to him, copy of which is annexure "C".

4) That thereafter appointment order of the petitioner was issued in BPS-9 vide Endst: No.2119-24/CT (M) by the then EDO, (Elementary & Secondary) Education Lakki on 25-2-2011. (Copy of appointment order is annexure "D")

(5) That consequent there upon, the petitioner was directed to perform his duty as CT teacher at GHS No.1 Tajori and accordingly he started his duty with zeal and zeast, at his respective working place.

6) That surprisingly, the petitioner was directed by he Principal of the said school not to perform duty as CT Teacher as the newly transferred EDO has illegally and with high handed ness issued a letter to the DOs/DDEOs not to consider the appointment of the petitioner and also to stop the salary thereof. ( Copy of the said letter dated 14/3/2011 is annexure "E".

**ATTESTED**

Filed Today

Additional Registrar

18/10/2011

**ATTESTE**  
EXAMINER  
Peshawar High Cou  
Bannu Bench

7) That being tortured and humiliated by the said one sided and arbitrary action of the EDO Lakki, the petitioner moved various petitions to the Highups for redressal of his grievance but invain. ( Copy of the said petition is annexure "F".

8) That the respondent No.4 has now again readvertised the said posts which is against law and totally void ad initio. (Copy of advertisement is annexure "G")

8) That being discriminated, the petitioners invoke the extra ordinary jurisdiction of this honourable court inter alia on the following grounds:-

**GROUNDS**

(i) That the impugned order and then re-advertisement of already occupied posts and rejection of petitioner on the basis whims and wishes of respondent No.4 is a glaring example of discrimination and exploitation, which is against the law and constitution.

(ii) That the respondents being civil servants were responsible to act in accordance with law and by not doing so, they have committed misfeasance and non feasance.

(iii) That not only the petitioner has faced hardships but also the concerned schools and children studying therein, have been deprived of their brilliant teachers and respondents have tried their best to destroy the future of respective beneficiaries.

(iv) That as per the verdict of the august Supreme court of Pakistan " *That a thing should be done in accordance with law and not in any other manner* " the respondents were duty bound to allow the petitioner to assume his charge at his respective place of working. Here it is pertinent to mention that the respondents have put the law

**ATTESTED**

**ATTESTED**

EXAMINER  
Peshawar High Court,  
Rana Bench

Additional Registrar  
10/10/2011

and procedure and existing norms of service law and general laws at one side and have committed a wrong without any lawful justification on the other side.

- (v) That the respondents have violated the principle of natural justice and the petitioner has been condemned unheard which is a vivid example of mal treatment.
- (vi) That there is no complaint against the petitioner from any quarter in respect of his assigned duty of CT teacher, he is still a legally appointed CT teacher and is entitled to draw his salary at his respective working place and to get all benefits given and extended to the same cadre in other schools. Moreover, it is also an established aspect of the petitioner's case that CT teacher (Female) PST (male) and PST (F) duly appointed with the petitioners have assumed their charges and are drawing their salaries at their respective working places.
- (vii) That the unilateral and biased decision of EDO Lakki Marwat is basically a void order, having no legal backing and footing at all, and is liable to be set aside by issuing an appropriate Writ by this Honourable court.
- (viii) That in this respect a grievance petition was moved to the worthy DCO Lakki Marwat on 8/10/2011, which was entertained wherein comments were called from the respondent-4

**ATTESTED**

Additional Registrar

19/10/2011

**ATTESTED**  
 EXAMINER  
 Peshawar High Court,  
 Bannu Bench

(EDO), Lakki Marwat who categorically admitted the stance of the petitioner by giving his reply in the shape of letter No.12351, dated 12/10/2011 which is annexure "H" & H-1, respectively.

- (ix) That the petitioner also seek permission to rely and advance additional grounds at the time of hearing of instant Writ petition

It is therefore humbly prayed that on acceptance of instant Writ petition, the respondent No.4 (EDO) may very kindly be directed to allow the petitioner to perform his duty as at Govt: High School No.1 Tajori, as CT teacher and also to release his salary w.e.f 25/2/2011 in view of order passed by the then EDO, (E) & (S) Education, Lakki Marwat, vide his order No.2119-24/CT(M), dated 25/2/2011.

Any other relief deemed fit and appropriate in the circumstances of the case, may also be granted in the best interest of justice.

**INTERIM RELIEF**

Interim relief, in shape of suspension of the advertisement dated 5/10/2011 in respect of readvertisement for the said posts, may also graciously be granted for the sake of justice.

Dated 19/10/2011

Naqibullah (Petitioner)  
CT teacher GHS No.1 Tajori

Through counsel

Inamullah Khan Kakki

Kakki (Advocate) High court  
(Bannu)

**ATTESTED**  
EXAMINER  
Peshawar High Court,  
Bannu Bench

**ATTESTED**

Additional Registrar

19/10/2011



**IN THE PESHAWAR HIGH COURT BANNU**  
**BENCH, BANNU**

Writ Petition No. \_\_\_\_\_ / 2011

Naqibullah Khan S/O Muhammad Zaman (CT Teacher)  
Govt: High School No.1 Tajori, Tehsil and district Lakki  
Marwat

.....:(Petitioner.)

.....(Petitioner)

Versus


- 1- Government of Khyber Pakhtun Khwa through Secretary Education, department, Peshawar.
- 2- Director Elemeentary and Secondary Education KPK Peshawar
- 3- The District Co-ordination Officer Lakki Marwat.
- 4- Executive District Officer ( E ) & ( S ) Education, Lakki Marwat.
- 5- The District Accounts officer Lakki Marwat.
- 6- Head Master GHS No.1 Tajori.

.....(Respondents )

**MEMO OF ADDRESSES OF PARTIES**

Respected Sir,

The parties may easily be served on the addresses referred to herein above

  
Naqibullah (Petitioner)  
CT teacher GHS No.1 Tajori

Throug counsel

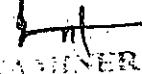
  
Inamullah Khan Kakki

Kakki (Advocate) High court  
(Bannu)

**ATTESTED**

  
Additional Registrar

19/10/2011

**ATTESTED**  
  
EXAMINER  
Peshawar High Court,  
Bannu Bench

Naqibullah.....VS.....Govt: of KPK etc

CERTIFICATE

It is to certify that no such Writ petition has been decided earlier nor pending in any other forum except the instant one.

LAW OF BOOKS

- I) Constitution of Islamic Republic of Pakistan, 1973.
- II) Civil Servant Actm 1973.
- III) Appointment, promotion and transfer order, 1989.
- IV) The ESTA Code and others according to need.

AFFIDAVIT

I, Naqibullah son of Muhammad Zaman resident of Umer Abad Tajori Lakki Marwat CT teacher (GHS NO.1); Tajori, the petitioner do hereby solemnly affirm and declare on oath that all the contents of instant Writ petition are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable court.

(Deponent)

**ATTESTED**

Identified by

11201-6389046-3  
No 22

Imamullah Khan (Kakki)  
Advocate ( High court (Bannu)

Additional Registrar  
19/10/2011

**ATTESTED**

EXAMINER  
Peshawar High Court,  
Bannu Bench

Certified that the above was verified on solemnly affirmation before me in office, this 19th day of Oct 2011 by Naqibullah S/o M. Zaman r/o Lakki Marwat who was identified by Imamullah Khan who is personally known to me

Qadri Commissioner  
Peshawar High Court

**Judgment Sheet**

**IN THE PESHAWAR HIGH COURT, BANNU**

**BENCH**

**[JUDICIAL DEPARTMENT]**

**W.P. No.338-B/2011**

**JUDGMENT**

Date of hearing: 05.12.2012

Petitioner(s) : Naqibullah Khan son of Muhammad Zaman resident of Umar Abad Tajori Lakki Marwat by Muhammad Usman Khan and Mr. Inamullah Khan (Kakki), advocates.

Respondent(s) : Government of Khyber Pakhtunkhwa through Secretary Education, Department, Peshawar, Executive District Officer (E)&(S) Education, Lakki Marwat and others by Mr. Ahmed Farooq Khattak, Additional Advocate-General.

**NISAR HUSSAIN KHAN, J :-** This petition is disposed of in light of our detailed findings given in our common judgment of even date, placed in connected WP No.339-B/2011, titled, "Ihsanullah Vs Govt. of Khyber Pakhtunkhwa through Secretary Education etc".

**Anno. Inced:**  
05.12.2012

*sd/ Nisar Hussain Khan J.*  
*sd/ Roshul Amin Khan J.*

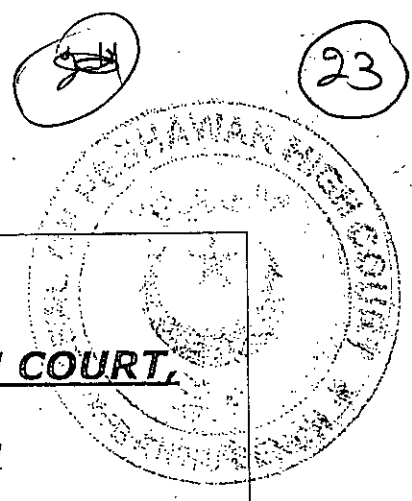
CERTIFIED TO BE TRUE COPY

*[Signature]*  
15-12-12

Peshawar High Court Bannu Bench  
Authorized Under Article 87 of  
The Government of Sindh Order 1984

**ATTESTED**

*[Handwritten signature]*  
15/12/12



**Judgment Sheet**  
**IN THE PESHAWAR HIGH COURT,**  
**BANNU BENCH**  
**[JUDICIAL DEPARTMENT]**

**W.P. No.339-B/2011**

**JUDGMENT**

Date of hearing: 05.12.2012

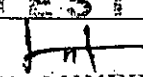
Petitioner(s) : Ihsanullah son of Watan Khan  
resident of Mohallah Azizan  
Daloo Khel District Lakki Marwat  
by Muhammad Usman Khan and  
Mr. Inamullah Khan (Kakki),  
advocates.

Respondent(s) : Government of Khyber  
Pakhtunkhwa through Secretary  
Education, Department,  
Peshawar, Executive District  
Officer (E)&(S) Education, Lakki  
Marwat and others by Mr.  
Ahmed Farooq Khattak,  
Additional Advocate-General.

**NISAR HUSSAIN KHAN, J :-** By way of this common judgment, we are going to dispose of instant writ petition as well as connected W.P. No. ~~3~~337-B/2011, filed by Liaq Shah and W.P. No.338-B/2011, filed by Naqibullah Khan, as common question of law and fact is involved in all the three petitions.

  
**ATTESTED**

**ATTESTED**

  
**EXAMINER**  
Peshawar High Court,  
Bannu Bench

2. In response to an advertisement floated by the respondents on 11.05.2010 in "Daily Aaj", in respect of the Posts of C.Ts. General (Male), all the three petitioners, being eligible for the Posts, submitted applications for their appointments. Ihsanullah petitioner of W.P. No.339-B/2011, was appointed on Retired Employees sons quota, after undergoing through necessary formalities of Medical Test, vide Endst. No.2119-24/CT (M), by the then Executive District Officer E&S Education Lakki Marwat, while Liaq Shah and Naqibullah Khan (petitioners of WP No.337-B/2011 and WP No.338-B/2011) respectively, were enlisted at S.No.1 and 2, of the merit-list, prepared after necessary test and interview. After fulfillment of necessary legal formalities, both were appointed in BPS.09 vide same appointment order, mentioned-above and their appointment was purely on merit, as per merit-list prepared by the respondents.

3. Later on, new incumbent, EDO Lakki Marwat, circulated a handwritten order on 14.03.2011 to D.Os/D.D.Os (M/F) that he has

ATTESTED

ATTESTED

EXAMINER  
Peshawar High Court,  
Bannu Bench

received large number of written as well as verbal complaints about different appointments, so they should not submit the source proforma to the District Accounts Officer, for release of their salaries, without his counter sign, failing which, they will be responsible for the consequences. On the basis of this order, all the three petitioners were restrained from performance of their duties and their salaries were also not released. On the basis of same advertisement great number of appointments were made, against various posts, against which there were general complaints, but all other appointees were given charge and their salaries were released. Only the petitioners were discriminated, without assigning any reason for the discriminatory treatment meted out to them. The only defence of the respondents was that there was an inquiry underway against the illegal appointments. But we are afraid to note with concern that said inquiry has not seen the light of the day, as yet, despite passage of about 02 years. It is also noted with concern that no

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ATTESTED  
*[Handwritten signature]*  
 EXAMINER  
 Peshawar High Court,  
 Muzam Banch

action had been taken against the delinquent official, who issued the alleged illegal appointment orders. Rather, it is apprised that he had been performing duties in this period and was transferred from district Lakki to Nowshera and therefrom he has retired on superannuation by receiving all the benefits.

4. This discriminatory and lukewarm attitude of the respondents, constrained us to summon the Secretary Education before the Court, who in compliance thereof, turned up, but had no plausible answer about the delinquent attitude of the respondents as well as the discriminatory treatment meted out to the petitioners. However, during the course of arguments, sensing the gravity of situation, respondents offered to issue fresh appointment orders of the petitioners, as they cannot be given salaries of the period, for which, they have not rendered any service to the department. The offer was candidly accepted by the petitioners and their counsel.

**ATTESTED**

**EXAMINER**  
Peshawar High Court,  
Rajore Bench

5. In view of the concurrence of the parties, without dilating upon the merits of the case in detail, we direct that the respondents shall issue appointment orders of all the three petitioners within a week, positively. All the three petitions are allowed in the above terms.

**Announced:**  
05.12.2012

sd/ Nisar Hussain Khanj  
sd/ Rounul Amin Khanj

CERTIFIED TO BE TRUE COPY

*[Signature]*  
Examiner - 15-12-12

Poshward High Court Bench  
Authorized Under Article 87 of  
The Lahore-Shanadat Order 1984

*[Handwritten signature]*  
12/12/12

S.No 1435

Date of Presentation of Application 15-12-12

No of Pages 10P

Copies 1

Urgent 1

Taxes 20/-

Date of Filing 15-12-12

Date of Issuance 15-12-12

Date of Receipt 15-12-12

Received by Jahanjis Khanj

M.Siraj Afridi P.S

*[Signature]*  
**ATTESTED**

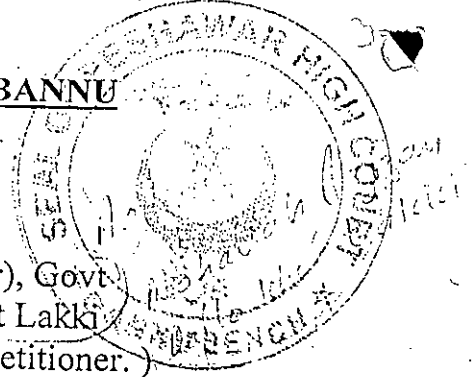


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**IN THE PESHAWAR HIGH COURT BANNU  
BENCH, BANNU**

Writ Petition No. 339-B/2011

Ihsanullah S/O Watan Khan (C. T Teacher), Govt.  
High School No.2. Tajori Tehsil and district Lakki  
Marwat.....(Petitioner.)



Versus

1. Government of Khyber Pukhtun Khwa through Secretary Education, department, Peshawar.
  2. Director Eeementary and Secondary Education KPK Peshawar
  3. The District Co-ordination Officer Lakki Marwat.
  4. Executive District Officer ( E ) & ( S ) Education, Lakki Marwat.
  5. The District Accounts officer Lakki Marwat.
  6. Head Master GHS No.2 Tajori.
- .....(Respondents )

WRIT PETITION UNDER ARTICLE 199 OF THE  
CONSTITUTION OF THE ISLAMIC REPUBLIC OF  
PAKISTAN, 1973,

**PRAYER:**

On acceptance of instant Writ petition, the respondent No.4 (EDO) may very kindly be directed to allow the petitioner to perform his duty as at Govt: High School No.2 Tajori, as CT teacher and also to release his salary w.e.f 25/2/2011 in view of order passed by the then EDO, (E) & (S) Education, Lakki Marwat, vide his order No.2119-24/CT(M), dated 25/2/2011.

Any other relief deemed fit and appropriate in the circumstances of the case, may also be granted in the best interest of justice.

**INTERIM RELIEF**

Interim relief, in shape of suspension of the advertisement dated 5/10/2011 in respect of readvertisement for the said posts, may also graciously be granted for the sake of justice..

Respectfully Sheweth:

**ATTESTED**

EXAMINER  
Peshawar High Court  
Bannu Bench

**ATTESTED**

Writ Today  
Additional Registrar  
19/10/2011

9A

26

- 1) That the petitioner is a bonafide resident of District Lakki Marwat. and on 11-5-2010, the respondent No.4 advertised posts of C.T, General (Male) etc for bonafide residents of district Lakki marwat. (Copy of advertisement dated 11/5/2010 is annexure "A").
- 2) That the petitioner was appointed on the basis of retired employees sons quota, coupled with the fact that the petitioner was completely fit and eligible for the said post. (Copy of ~~required~~ documents are enclosed herewith as annexure "B,
- 3) That the petitioner has undergone all the necessary formalities. wherein the medical test was conducted under the supervision of MS, DHQ hospital, Lakki Marwat and Medical fitness certificate was issued to him, copy of which is annexure "C".
- 4) That thereafter appointment order of the petitioner was issued in BPS-9 vide Endst: No.2119-24/CT (M) by the then EDO, (Elementary & Secondary) Education Lakki on 25-2-2011. (Copy of appointment order is annexure "D")
- (5) That consequent there upon, the petitioner was directed to perform his duty as CT teacher at GHS No. ~~I~~ Tajori and accordingly he started his duty with zeal and zeast, at his respective working place.
- 6) That surprisingly, the petitioner was directed by he Principal of the said school not to perform duty as CT Teacher as the newly transferred EDO has illegally and with high handed ness issued a letter to the DOs,/DDEOs not to consider the appointment

Filed Today  
Additional Registrar  
18/10/2011

ATTESTED

ATTESTED

EXAMINER  
Peshawar High Court,  
Bannu Bench

of the petitioner and also to stop the salary thereof. ( Copy of the said letter dated 14/3/2011 is annexure "E".

7) That being tortured and humiliated by the said one sided and arbitrary action of the EDO Lakki, the petitioner moved various petitions to the Highups for redressal of his grievance but invain. ( Copy of the said petition is annexure "F".

8) That the respondent No.4 has now again re-advertised the said posts which is against law and totally void ad initio. (Copy of advertisement is annexure "G")

9) That being discriminated, the petitioners invoke the extra ordinary jurisdiction of this honourable court inter alia on the following grounds:-

**GROUNDS**

(i) That the impugned order and then re-advertisement of already occupied posts and rejection of petitioner on the basis whims and wishes of respondent No.4 is a glaring example of discrimination and exploitation, which is against the law and constitution.

(ii) That the respondents being civil servants were responsible to act in accordance with law and by not doing so, they have committed misfeasance and non feasance.

(iii) That not only the petitioner has faced hardships but also the concerned schools and children studying therein, have been deprived of their brilliant teachers and respondents have tried their best to destroy the future of respective beneficiaries.

(iv) That as per the verdict of the august Supreme court of Pakistan " *That a thing should be done in accordance with law and not in any other manner* " the respondents were duty bound to

**ATTESTED**

Additional Registrar  
14/10/2011

**ATTESTED**

EXAMINER  
Feshawal High Court,  
Bannu Bench

allow the petitioner to assume his charge at his respective place of working. Here it is pertinent to mention that the respondents have put the law and procedure and existing norms of service law and general laws at one side and have committed a wrong without any lawful justification on the other side.

(v) That the respondents have violated the principle of natural justice and the petitioner has been condemned unheard which is a vivid example of mal treatment.

(vi) That there is no complaint against the petitioner from any quarter in respect of his assigned duty of CT teacher, he is still a legally appointed CT teacher and is entitled to draw his salary at his respective working place and to get all benefits given and extended to the same cadre in other schools. Moreover, it is also an established aspect of the petitioner's case that CT teacher (Female) PST (male) and PST (F) duly appointed with the petitioners have assumed their charges and are drawing their salaries at their respective working places.

(vii) That the unilateral and biased decision of EDO Lakki Marwat is basically a void order, having no legal backing and footing at all, and is liable to be set aside by issuing an appropriate Writ by this Honourable court.

**ATTESTED**

Filed Today

Additional Registrar

19/10/2011

**ATTESTED**

EXAMINER  
Peshawar High Court,  
Bannu Bench

(viii) That in this respect a grievance petition was moved to the worthy DCO Lakki Marwat on 8/10/2011, which was entertained wherein comments were called from the respondent-4 (EDO), Lakki Marwat who categorically admitted the stance of the petitioner by giving his reply in the shape of letter No.12351, dated 12/10/2011 which is annexure "H" & H-1, respectively.

(ix) That the petitioner also seek permission to rely and advance additional grounds at the time of hearing of instant Writ petition.

It is therefore humbly prayed that on acceptance of instant Writ petition, the respondent No.4 (EDO) may very kindly be directed to allow the petitioner to perform his duty as at Govt: High School No. 1 Tajori, as CT teacher and also to release his salary w.e.f 25/2/2011 in view of order passed by the then EDO, (E) & (S) Education, Lakki Marwat, vide his order No.2119-24/CT(M), dated 25/2/2011.

Any other relief deemed fit and appropriate in the circumstances of the case, may also be granted in the best interest of justice.

**INTERIM RELIEF**

Interim relief, in shape of suspension of the advertisement dated 5/10/2011 in respect of readvertisement for the said posts, may also graciously be granted for the sake of justice.

Dated 19/10/2011

Though counsel

*Ihsanullah*  
Ihsanullah (Petitioner)  
CT teacher GHS No.2 Tajori

*Inamullah Khan Kakki*  
Inamullah Khan Kakki  
(Advocate) High court  
(Bannu)

**ATTESTED**

*[Signature]*  
EXAMINER  
Peshawar High Court,  
Bannu Bench

*[Signature]*  
**ATTESTED**

Filed Today  
*[Signature]*  
Additional Registrar  
19/10/2011

Appointment *اپنی ترقی کے لئے اور نہ ترقی کے لئے* *اپنی ترقی کے لئے اور نہ ترقی کے لئے* *اپنی ترقی کے لئے اور نہ ترقی کے لئے* EP O *28*

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&S) EDUCATION LAKKI MARWAT

OFFICE ORDER:-

In pursuance of the directions of Hon: Peshawar High Court Bench Bannu on 05-12-2012 and in continuation to this office appointment order No.2119-24/CT(M) Dated 25-02-2011, the three candidates of below named are directed to take over their charge in the schools with immediate effect, shown against each in the above mentioned appointment order.

1. Mr.Laiq Shah S/O Nabi Shah R/O Gandi Khan Khel.
2. Mr. Naqib Ullah Khan S/O.Muhammad Zamian R/O Umar Abad.
3. Mr.Ihsan Ullah S/O Watan Khan R/O Dallo Khel.

Note:- Their appointment will be subject to the enquiry result already conducted by the Competent authorities.

Executive District Officer  
(E&S) Education Lakki Marwat

Endst.No. 10628-35

Dated 7-12/12

Copy to the:-

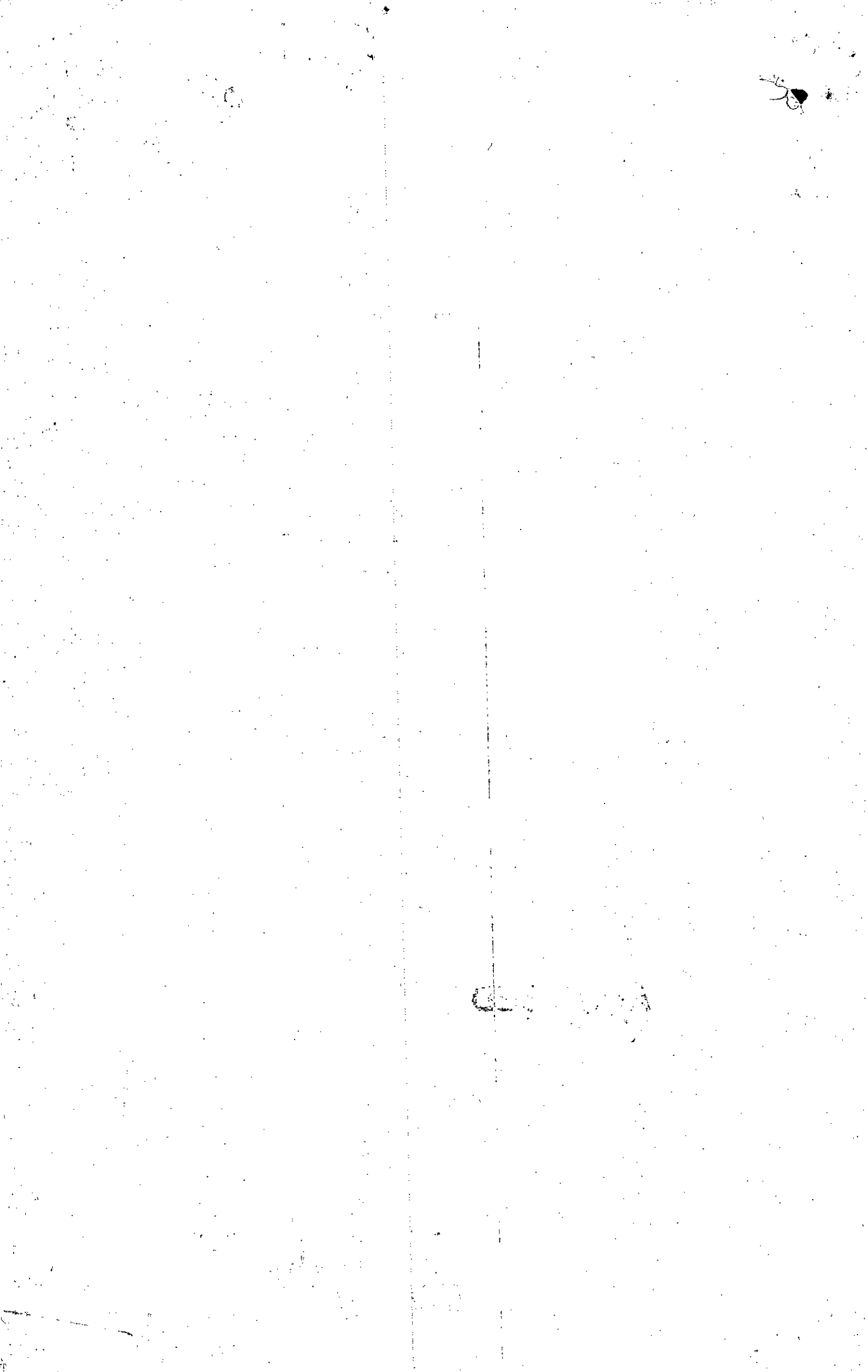
1. Secretary to Govt: of Elementary & Secondary Education Deptt: Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. District Coordination Officer, Lakki Marwat.
4. District Accounts Officer, Lakki Marwat.
5. Additional Registrar Peshawar High Court, Bannu Bench.
6. Additional Advocate General Peshawar High Court Bannu Bench.
7. Head Master concerned schools.
8. Official concerned.

Executive District Officer  
(E&S) Education Lakki Marwat

**ATTESTED**

*appointment order*  
*2119-24 dtd*  
In Continuation to EDO (E&S) LAKKI MARWAT  
25-2-2011 appointed against C.T Post vide EDO (E&S) Code:  
Lakki End no: 10628-35 dated 7-12-2012.

*502*



appointment  
29  
24

P2N.W.F.P Med No-4

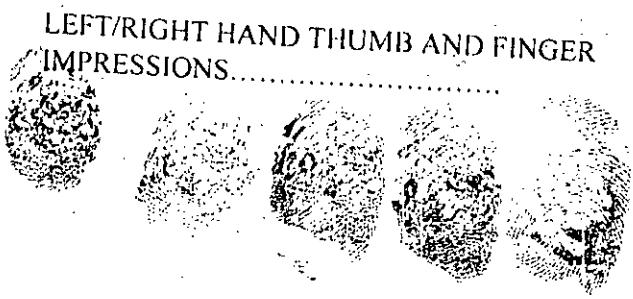
GS & PD NWFP -27 FS 2000 P of 100 297-98.

**MEDICAL FITNESS CERTIFICATE.**

Name of Official ..... Nagibullah Khan  
Religion..... Islam Muslim.....  
Father/Husband Name..... Muhammad Zaman Khan  
Residence..... Village Umerabad Tajeri  
Teh & Dist, Lakkimawat  
Dated of Birth. 20/9/1983 (NIC No. 11201-6389046-3)  
Exact Height by measurement..... 5-8  
Personal Mark of Identification..... A Mole under right eye  
Signature of Official..... [Signature] A black mole under Rt. eye  
Signature of Head of Office..... [Signature] took over charge on  
7/12/2012  
**PRINCIPAL**  
Seal of Office. Govt: High School Tajeri  
Dist: Lakkimawat

I do hereby certify I have examined..... Nagibullah Khan a  
candidate for employment in the office of the..... ED.O (E&S) Lakkimawat  
and can not discover that he/she had any diseases communicable or other constitutional affection  
or bodily infirmity except.....

I do not consider this as disqualification for employment in the office of the.....  
ED.O (E&S) Edu Lakkimawat..... His/Her  
age according to his own Statement..... 29 years and by appearance  
about 29 years (.....) years.



14-12-2012

Medical Superintendent  
DHQ Hospital Lakkimawat.  
Medical Superintendent  
D.H.Q Hospital Lakkimawat

**ATTESTED**



رجحان رپورٹ ہے جو اعلیٰ کورٹ کے فیصلے کے لئے لیا گیا ہے۔

G.S.P.O. NWFP 248 Form Store 1R 10-2005(6)/PW(Z)/Form Store Jobs/Atty-42

CERTIFICATE OF TRANSFER OF CHARGE 7/12/2012 (A/N)

- 1. Certified that we have on the fore/afternoon of this day respectively made over and receive charge of this office of the Executive District Officer Lakkimangal order No. 2119-24 of Mr. Nazibullah Khan C.T.(G) dated 07/12/2012.
- 2. Particulars of cash and important secret and confidential documents handed over are noted on the reverse:—

Signature of relieved Government servant Ghulam Farid

Designation C.T.

Station Govt. High School No. I Taji

Signature of relieving Government servant Nazibullah Khan

Designation C.T.

Dated 07/12/2012

~~UNREGISTERED~~

31

Endst No: 161-166

DATE: 07/12/2012 (A/N)

copy to:-

- 1) Director Elementary & Secondary (Lakki Marwat)
- 2) EDO (E&S) Education (Lakki Marwat)
- 3) D.A.O Lakki Marwat
- 4) D.C.O Lakki Marwat
- 5) P/ File of the Office Concerned
- 6) Official Concern

~~Signature~~

Principal

GHS-II Tejori

**PRINCIPAL**  
Govt. High School Tejori  
Dist: Lakki Marwat

WP -----/2015.

Naqeeb Ullah Khan and others.

Versus

Executive District Officer, Elementary & Secondary Education, Lakki Marwat and others.

R/Sir,

The instant WP was returned to the learned counsel for the reason that the case does not relate to this Hon'ble Court. The learned counsel resubmitted the same on the grounds mentioned in the PUC Flag-"A".

If approved we may return the same to the learned counsel or fix before this Hon'ble Court.

Submitted for orders, please.

*HVC*  
*[Signature]*  
6/2

Add: Registrar

2. For kind consideration & orders, pls.

H.C.F.

The returned with the direction to file in in Government Bench of this court.

A  
8/2/15

9/2.

HVC

Attested  
*[Signature]*

10  
32  
Order # 2-92/2/4/2015

Secretary Education  
Schools and Literacy Department,  
Civil Secretariat,  
Peshawar.

APPEAL AGAINST THE DIRECTOR  
EDUCATION, KHYBER PAKHTUNKHWA IN  
WHICH APPELLANT WAS DEPRIVED FROM  
SENIORITY WHICH SHOULD BE GRANTED  
FROM 25/02/2011 AND THE ARREARS/  
SALARIES AGAINST THE SENIORITY IS  
DUE AGAINST THE DEPARTMENT.

Respectfully Sheweth:

That on 11/05/2010 Education Department given an advertisement in daily "AAJ" C.T General (Male), so being eligible and qualified for the post, appellant applied for the same.

2 That after conducting test on 07/06/2010 and interview on 15/06/2010 Education Department issued order of appointment on 25/02/2011 after the meeting of District Selection Board on 24/02/2011 in which appellant name is visible.

  
**ATTESTED**

3. That one month time was given for taking the charge but in the meanwhile on 28/02/2011 E.D.O was transferred and appellant obtained Medical Fitness Certificate from District Headquarter Hospital, Lakki Marwat.
4. That on 10<sup>th</sup> March 2011 appellant went to school for joining, it is worth mentioning to note here that arrival to school is within stipulated time mentioned in the order.
5. That Headmaster of the School was not present and acting Headmaster order appellant to sign in attendance register and appellant did so, and Headmaster assures appellant that your arrival is done in due course.
6. That the appellant properly and regularly made attendance in attendance register and perform their duty with devotion.
7. That on 14/03/2011 appellant come a cross a problem of arrival, because EDO issued an order with regard of some irregularity by that they stopped the salary of the appellant.
8. That in the month of October 2011, appellant filed a Writ Petition before the Hon'ble Peshawar High Court, Bannu Bench, which was disposed off on 05/12/2012 in appellant favour.

9. That the appellant was reinstated by the Department and also condemned the attitude of the Director Education K.P.K, consequent upon which the Director Education K.P.K issued 2<sup>nd</sup> Appointment Orders on 17/12/2012 to the appellant.

10. That on 07/12/2012, once again appellant applied for another Medical Fitness Certificate which was granted accordingly.

11. That on 07/12/2012 appellant took the charge vide endorsement No. 161-166 dated 07/12/2012, within stipulated time now serving in the department/ school.

12. That the appellant came to know about the seniority list, in which the appellant his 2<sup>nd</sup> joining was considered for that, despite the fact that the order was set aside by the Hon'ble Peshawar High Court, Bannu Bench.

That appellant applied time and again to the high-up's i.e. Director Education K.P.K, for redressal of his grievances with regard of seniority, but without any fruitful result. till date, hence the instant Departmental Appeal on the following grounds:

  
**ATTESTED**

ATTACHED

GROUNDS:

- A. That the act of the concerned authority for not granting seniority/ salaries to the appellant is against facts, law and procedure, hence, untenable being unjust and unfair.
- B. That the appellant was not treated in accordance with law and rules, thus acted in violation of the relevant laws laid down for this purpose.
- C. That no show cause notice whatsoever have been issued by the concerned authority, for not granting such relief despite the fact that original appointment of the appellant is 25/02/2011, the whole departmental proceedings were initiated by concerned authority, illegally and unlawfully without observing the legal codal formalities as required.
- D. That the concerned authorities have taken a unilateral action at the back of the appellant. Despite the fact that almost all were giving seniority from the back date. The appellant has not been afforded an opportunity of being heard and thus he has been condemned unheard and

  
 ATTESTED



Thus the settled principles of natural justice have been violated.

E. That as mentioned as earlier stated of this Departmental Appeal, that the act of the concerned authorities is based on malafide and the appellant is the only scapegoat who have been deprived of their due rights illegally, unlawfully and mechanically by the Education Department and thus they have been discriminated by the department by violating Article 25 of the Constitution of Pakistan 1973.

F. That the appellant is regular Civil Servant and has rendered sufficient service in the department with unblemished service record and he could not be deprived of his due right without observing/ fulfilling the legal formalities and thus the action taken by the department against the appellant is based on malafide. The appellant is been deprived from giving seniority from 25/02/2011 and if possible the salaries against that.

G. That the conduct of the concerned authority, is against the rules/ regulation of service and in violation of the established principles of equity and justice, calling for intervention by the Hon'ble Court.

**ATTESTED**

H.

That by not issuing such order of the appellant the classical examples of political victimization.

It is, therefore, most humbly prayed that on acceptance of this Departmental Appeal, your good self may graciously be pleased to direct the concerned authority i.e. Director Education, K.P.K that:

- i. Seniority of the appellant be considered from 25/02/2011
- ii. That the salaries be also given from 25/02/2011 up to 07/12/2012.
- iii. Any other order deem proper/fit may also be give / issue in favour of appellant.

Appellant

*Naqeeb*

**Naqeeb Ullah Khan**  
C.T (M) Posted at Government  
Middle School, Sattar Bettan,  
Post Office Tajori, Tehsil  
and District Lakki Marwat

*[Signature]*

لائیق مشاہدہ

38

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) LAKKI MARWAT

10/10/2014

SENIORITY OF CT

Sl#	Name	Father Name	Qual:	Prof:Qualif:	BPS	D.O.Birth	D.O 1st appo:	D.O. P.to the present post	School	Remarks
1	Moin Jan	Nabl ulla Jan	BA	CT	16	8-Apr-55	20-Oct-76	20-Oct-76	GHS No.2 Lakki	
2	Muhammad Iqbal	Mir Baz Khan Khan	BA	CT	16	1-Apr-56	11-Nov-76	11-Nov-76	GCMHS No.1 Lakki	
3	Ahmad Shah	Faqir Shah	BA	CT	16	1-Dec-59	2-Mar-78	2-Mar-78	GMS Gauraka syed Khel	
4	Sahib Noor	Gul Alam Khan	MA	B.Ed	16	21-Mar-58	7-May-79	7-May-79	GMS Badni Khel	Appointed by SST (G)
5	Munawar Shah	Jalander Shah	BA	CT	16	1-Apr-59	5-Nov-79	5-Nov-79	GMS Gauraka syed Khel	
6	Amir Aman Khan	Akram Khan	BA	CT	16	16-Nov-59	25-May-80	25-May-80	GHHS Abba Khel	
7	Mir Aslam Khan	Ghulam Saeed	BA	CT	16	2-Jan-58	16-Dec-80	16-Dec-80	GHS Ahmad Khel	
8	Sahib Shah	Zaro Jan	MSc	CT	16	12-Aug-56	28-Feb-81	28-Feb-81	GHSS Shahbaz Khel	
9	Munawar Khan	Abdul Karim Khan	BA	DAE	16	1-Jun-62	11-Apr-81	11-Apr-81	GHS Isak Khel	
10	Raham Dil Khan	Syed Bad Shah Khan	BA	CT	16	9-Jul-60	24-Sep-81	24-Sep-81	GHSS Sarai Naurang	
11	Ghazi Marjan	Muhammad Ghous	BA	CT	16	1-Mar-59	19-Oct-81	19-Oct-81	GHSS Sarai Naurang	
12	Haroon ur Rashid	Muhammad Hussain	BA	CT	16	14-Feb-60	14-Nov-81	14-Nov-81	GHS Jegu Khel	
13	Saif ur Rehman	Mir Baz Khan	MA	DAE	16	30-Sep-59	9-Feb-82	9-Feb-82	GHSS Taja Zai	
14	Muhammad Jan Hanan	Badshah Khan	BA	CT	16	1-Mar-59	15-Mar-82	15-Mar-82	GHSS Taja Zai	
15	Bashir Khan	Shadi Khan	BA	CT	16	25-Jul-58	23-Oct-82	23-Oct-82	GMS Bakhtal Ahmad Zai	
16	Mir Kabul Khan	Sher dil Khan	BA	DAE	16	1-Oct-63	24-Oct-82	24-Oct-82	GHS Baist Khel	
17	Sher Bahadar	Saeed Khan	BA	CT	16	9-Sep-63	21-Nov-82	21-Nov-82	GHS Isak Khel	
18	Abdur Rashid	Muhammad Akram	BA	CT	16	7-May-60	28-Nov-82	28-Nov-82	GMS Aghzar Khel	
19	Ahmad Jan	Nazar Jan	BA	CT	16	5-Dec-59	10-Jan-83	10-Jan-83	GHS Dallo Khel	
20	Amraz Khan	Atlas Khan	BA	CT	16	21-Jun-63	1-Mar-83	1-Mar-83	GHS Isak Khel	Deed on
21	Abdur Rasheed Khan	Mir Ahmad Jan	BA	CT	16	5-Oct-64	1-Mar-83	1-Mar-83	GHS Kheru Khel Pacca	
22	Mir Abbas Khan	Nawab Khan	MA	B.Ed	15	14-Oct-58	4-Apr-83	4-Apr-83	GHS Mela Mandra Khel	involved in criminal case
23	Fazal Ghani	Abdul Hassan	BA	B.Ed	16	14-Apr-58	29-Sep-83	29-Sep-83	GCMHS No.1 Lakki	
24	Shah Muhammad	Yar Muhammad	BA	CT	16	18-Feb-64	13-Nov-83	13-Nov-83	GHSS Shahbaz Khel	
25	Abdul Majeed Shah	Mehmood Shah	BA	CT	16	15-Mar-64	14-Nov-83	14-Nov-83	GHS Chazni Khel	
26	Ahmad Khan	Muhammad Khan	BA	CT	16	25-Jan-63	28-Nov-83	28-Nov-83	GHS Baist Khel	
27	Muhammad Shafiq	Ghulam Rabbani	BA	CT	16	14-May-62	30-Jan-84	30-Jan-84	GMA Wanda Kuttana	
28	Abdul Hanan	Abdul Manan	BA	CT	16	1-Dec-63	1-Feb-84	1-Feb-84	GHS Zangi Khel	

ATTESTED

4

39

29	Ottawar Khan	Zar Gul Khan	MA	B.Ed	16	4-Apr-65	17-Oct-84	17-Oct-84	GCMHS No.1 Lakki	3rd Division
30	Wahid Ullah Khan	Maad ullah Khan	BA	CT	16	15-Feb-61	5-Nov-84	5-Nov-84	GHS Land Ahmad Khel	
31	Saif ur Rehman	Mir Afzal Khan	BA	CT	16	12-Jan-66	6-Jan-85	6-Jan-85	GHSS Taja Zai	
32	Sahib Gul	Gul Khan	BA	CT	16	15-Jan-63	14-Jan-85	14-Jan-85	GHS Kotla Nawab Khan	
33	Muhammad Ilyas	Abdus Salam	MA	MA.Ed	16	15-Apr-60	7-Sep-85	7-Sep-85	GHSS Sarai Naurang	
34	Latif Ullah	Ayaz Khan	BA	CT	16	16-Feb-64	13-Oct-85	13-Oct-85	GHS, Bragi	
35	Muhammad Zaman Khan	Mir Abat Khan	BA	CT	16	8-Aug-56	2-Nov-85	2-Nov-85	GMS Abbasa Khattak	
36	Wazir Khan	Ghulm Qadir	BA	CT	15	24-Apr-62	11-Nov-85	11-Nov-85	GHS Dallo Khel	Died
37	Meh Beram Khan	Qasim Khan	BA	CT	16	10-Sep-65	1-Mar-86	1-Mar-86	GHSS Abdul Khel	
38	Akhtar Munir Khan	Rahim gul Khan	BA	DAE	16	12-Mar-64	25-Aug-86	25-Aug-86	GHSS Darra Pezu	
39	Ikram ullah Khan	Hidayatullah Khan	BA	DAE	16	31-Aug-67	1-Oct-86	1-Oct-86	GHS Urtar Khel	
40	Muhammad Anwar	Muhammad Saleem	BA	DAE	16	15-Apr-63	1-May-87	1-May-87	GHSS Sarai Naurang	
41	Sarwar Khan	Saad Ullah Khan	BA	DAE	16	2-Oct-63	12-Sep-87	12-Sep-87	GHSS Darra Pezu	
42	Dilawar Khan	Musa Khan	BA	CT	16	1-Nov-63	30-Sep-87	30-Sep-87	GCMHS No.1 Lakki	
43	Alamgir Khan	Mir Azam Khan	BA	CT	16	14-Jun-61	3-Nov-87	3-Nov-87	GHS Harama Talq	
44	Muhammad Yaqoob	Mir Qasim	MA	M.Ed	16	12-Jun-62	14-Nov-87	14-Nov-87	GCMHS No.1 Lakki	BA 3rd Division
45	Sahib ud Din	Noor Muhammad	MA	M.Ed	16	2-Mar-65	14-Oct-87	16-Nov-87	GHS Tabl Murad	
46	Hameed Ullah Khan	Sarbiland Khan	BA	M.Ed	16	11-Jan-65	21-Nov-87	21-Nov-87	GMS Daulat Khel	
47	Muhammad Salim Khan	Amjallah Khan	MA	AWI	16		25-Nov-87	25-Nov-87	GHS No.2 Lakki	
48	Hizam ud Din	Meher Dad Khan	MA	B.Ed	16	18-Dec-54	23-Apr-80	29-Nov-87	GMS Mina Khel	BA-3rd Division
49	Muhammad Nasir	Haji Haq Nawaz	BA	B.Ed	16	15-Mar-57	3-Dec-80	29-Nov-87	GMS Wanda Michen Khel	appointed as SST (G)
50	Yaqub Khan	Mosam Khan	MA	B.Ed	16	7-Jan-61	11-Dec-83	29-Nov-87	GHS Nar Muzafar Khan	appointed as SST (G)
51	Muhammad Younis	Qasim Khan	MA	B.Ed	16	10-Jun-61	5-Apr-81	29-Nov-87	GMS Adam Zai	appointed as SST (G)
52	Rafi Ullah Khan	Jalat Khan	MA	M.Ed	16	20-Aug-63	22-Sep-87	29-Nov-87	GMS Wanda Mir Alam	
53	Muhammad Nawaz Khan	Samand Khan	BA	B.ed	16	10-Dec-63	12-Mar-83	29-Nov-87	GMS Dabak Mandra Khel	BA 3rd Division
54	Abdul Hameed	Amir Sultan	BA	B.Ed	16	30-Dec-64	18-Jan-83	29-Nov-87	GHS Nawar Khel	appointed as SST (G)
55	Muhammad Aslam Khan	Sarfraz Khan	BA	B.Ed	16	1-May-63	15-Oct-87	30-Dec-87	GHS Matora	
56	Muhammad Iqbal Khan	Razi Khan	BA	CT	16	8-Dec-64	10-Feb-88	10-Feb-88	GMS Daulat Khel	
57	Abdullah Khan	Bait ullah Khan	MA	B.Ed	16	6-Apr-64	16-May-88	16-May-88	GHS Wanda Samandi	
58	Hamid Ullah Jan	Painda Khan	BA	B.Ed	16	1/5/1959	21-Apr-81	7/12/1988	GHS Nar Muzaffr Khan	Died
59	Shah Kamal	Darray Khan	BA	DAE	16	1-Jul-64	29-Sep-88	29-Sep-88	GHSS Darra Pezu	
60	Mushtaq Ahmad	Amir Sulaiman	MA	CT	16	1-Oct-59	30-Jun-81	17-Oct-88	GHS Tap Takhi Khel	
61	Mashal Khan	Azam Khan	BA	B.Ed	16	2-May-59	5-Dec-81	8-Dec-88	GMS, Hayat Khel	
62	Abdul Hameed Khan	Safdar Khan	MA	B.Ed	16	20-Mar-61	9-Apr-81	8-Dec-88	GHSS Sarai Naurang	

ATTESTED

63	Gul Rehman	Gul Ahmad Khan	BA	B.Ed	16	13-Jul-63	3-Nov-85	3-Apr-89	GHS Meba Shahab Khel	
64	Az Sufiah Jan	Isa Khan	BA	B.Ed	16	18-Apr-60	6-Oct-82	9-Sep-89	GHS Isak Khel	
65	Muhammad Ullah Khan	Abullah Jan	MA	B.Ed	16	17-Apr-59	8-Jul-81	14-Sep-89	GHS Isak Khel	
66	Hamayun Khan	Aman Ullah Khan	MA	B.Ed	16	21-Jan-63	22-Oct-83	26-Sep-89	GHS Gandoman Khel	
67	Habib Ullah Khan	Sultan Khan	MA	B.Ed	16	13-Mar-66	19-Oct-85	19-Oct-89	GHS Darra Pezu	
68	Zain ud Din	Umer Khan	BSc	B.Ed	16	10-Oct-69	23-Oct-89	23-Oct-89	GHS Begu Khel	3.rd Division
69	Behram Shah	Gulab Khan	BA	CT	16	9-Jan-68	27-Nov-89	27-Nov-89	GHS Matora	
70	Muhammad Ismail Khan	Ghulam Sadique	MA	B.Ed	16	20-Oct-71	27-Nov-89	27-Nov-89	GMS Muhammad Khel	
71	Zafar Ali	Nadir Khan	BA	DAE	16	27-Sep-65	17-Nov-86	7-Dec-89	GHHS Abba Khel	
72	Abul Kalam	Muhammad Saeed	BA	B.Ed	16	28-Sep-62	1-Jul-84	9-Dec-89	GCMHS No.1 Lakki	
73	Gul Zaman	Ghadi Marjan	MA	B.Ed	16	20-Apr-63	11-Dec-89	11-Dec-89	GCMHS No.1 Lakki	
74	Jehanzab Khan	Muhammad Karim	BA	CT	16	29-Mar-64	13-Dec-89	13-Dec-89	GMS Nazar Jan Behattan	
75	Abdul Hamid	Ghulam Haider	MA	B.Ed	16	10-Nov-57	16-Aug-81	6-Jan-90	GMS W/Kalan	Not willing for promotion
76	Abul Usman	Faiz Muhammad	MA	B.Ed	16	25-Feb-64	22-Jan-90	22-Jan-90	GCMHS No.1 Lakki	
77	Muhammad Salim	Aman Ullah Khan	MA	B.Ed	16	1-Oct-67	24-Jan-90	24-Jan-90	GMS Nawaz Mala Khel	
78	Muhammad Shamim	Muhammad Umer	MA	B.Ed	16	9-Nov-62	6-Dec-81	11-Feb-90	GMS Mir Azam Michen Khel	
79	Sadiq Ahmad	Amir Muhammad	MSc	B.Ed	16	3-Jun-64	20-Feb-90	20-Feb-90	GHS, Mch: Amir Wolf	
80	Abdul Rahim	Ghulam Saeed	BA	CT	16	28-May-65	24-Feb-90	24-Feb-90	GHSS Taja Zal	
81	Sultan Muhammad	Ghulam Muhammad	BA	B.Ed	16	7-Jan-67	26-Feb-90	26-Feb-90	GCMHS No.1 Lakki	
82	Sarwar Khan	Abdul Azeem	MA	CT	16	18-Feb-60	28-Mar-90	28-Mar-90	GHS Kheru Khel Pacca	
83	Muhammad Aslam Khan	Mir Bas Khan	BA	CT	16	9-Aug-62	4-Apr-90	4-Apr-90	GHS, No. 3 Lakki	
84	Abul Hasan	Ghulam Jan	MSc	B.Ed	16	18-Mar-64	1-Dec-85	4-Apr-90	GHSS Darra Pezu	
85	Inam Ullah Khan	Habib Ullah Khan	BA	CT	16	22-Apr-66	4-Apr-90	4-Apr-90	GHS Kheru Khel Pacca	
86	Faqir Abdus Sabaor	Faqir Abdul Khatiq	MA	B.Ed	16	2-Feb-65	12-May-90	12-May-90	GCMHS No.1 Lakki	
87	Sarwar Khan	Ali Jan	BA	B.Ed	16	14-Oct-61	14-Nov-82	8-Oct-90	GHS Begu Khel	
88	Mir Zalam Khan	Qaza Khan	BA	B.Ed	16	21-Jun-59	6-Dec-81	13-Dec-90	GHS Tari Khel	
89	Noor Alam Khana	Mir Akbar Khan	BA	B.Ed	16	10-Sep-55	12-Dec-81	26-Dec-90	GHS Zafar Mama Khel	
90	Muhammad Rafiq Shah	Ahmad Shah	BA	CT	16	13-Jan-63	13-Jan-91	13-Jan-91	GMS Muhammad Khel	
91	Ahmad Jan	Muhammad Rasool	BA	CT	16	20-Dec-60	20-Mar-83	23-Jan-91	GMS Kechi Kamar	
92	Ghulam Akhbar	Karim bakhsh	BA	B.Ed	16	20-Mar-64	24-Jan-91	24-Jan-91	GHS Baist Khel	
93	Khanzada	Ayaz Khan	BA	B.Ed	16	16-May-66	11-Nov-86	14-Mar-91	GHS Behram Khel	
94	Abdul Ghani	Muhammad Saeed Khan	MA	B.Ed	16	10-Jun-62	6-Nov-85	20-May-91	GHS Baist Khel	
95	Mir Aslam Khan	Haji Noor Muhammad	BA	B.Ed	16	12-Jan-63	30-Dec-84	15-Nov-91	GMS Wanda Amir	
96	Abdul Sattar Khan	Muhammad Aslam Khan	MA	B.Ed	16	6-Oct-65	12-Sep-87	4-Feb-92	GHS Eegu Khel	

**ATTESTED**

98	Abdul Ullah Jan	Gul Janan	BA	B.Ed	16	20-Oct-64	15-Oct-87	2-Apr-92	GHS Dallo Khel	
99	Abdul Ullah Jan	Gul Janan	BA	B.Ed	16	20-Oct-64	15-Oct-87	2-Apr-92	GHS Dallo Khel	
100	Obaid Ullah Jan	Hakeem Shah	MA	B.Ed	16	2-Dec-65	18-Nov-86	24-Apr-92	GHHS Masha Mansoor	appoint: as SST (M/Phy)
101	Muhammad Wali	Aman Ullah	MSc	B.Ed	16	18-May-67	25-Apr-92	25-Apr-92	GMS Wanda Shamadli	appoint: as SST (Biochem)
102	Iqbal Ullah Khan	Nabi Ullah Jan	M.Phil	M.Ed	16	20-Mar-87	29-Apr-92	29-Apr-92	GCMHS No.1 Lakki	appoint: as SST (M/Phy)
103	Abdul Wahab	Mosam Khan	MA	M.Ed	16	1-Dec-67	30-Apr-92	30-Apr-92	GMS Wazir Kala	
104	Rehmat Ullah Khan	Muhib Ullah Khan	MA	B.Ed	16	14-Aug-70	30-Apr-92	30-Apr-92	GHSS Sarai Naurang	
105	Umer Khan	Sher Ali Khan	MA	M.Ed	16	14-May-68	29-Apr-92	1-May-92	GMS Wanda Michen Khel	
106	Muhammad Subhan	Ghulam Nabi	MA	B.Ed	16	3-Jan-70	14-May-92	14-May-92	GHSS Sarai Naurang	
107	Umer Daraz Khan	Abdullah Jan	MA	B.Ed	16	20-Oct-68	30-May-92	30-May-92	GHS Isak Khel	
108	Muhammad Hanif	Sardar Khan	MA	B.Ed	16	5-Oct-70	30-May-92	30-May-92	GHHS Abba Khel	
109	Hameed Ullah	Yaqoob Khan	MA	B.Ed	16	11-Jan-68	1-Jun-92	1-Jun-92	GMS Multan Manji Wala	
110	Sidayat Ullah Khan	Mir Nawaz	MA	B.Ed	16	1-May-68	6-Jun-92	6-Jun-92	GHHS Kot Kashmir	
111	Sharif Ullah Khan	Ghulam Muhammad Khan	MA	M.Ed	16	1-May-64	25-Apr-92	21-Jun-92	GHHS Landiwah	
112	Muhammad Ayub Khan	Sardar Khan	MA	B.Ed	16	3-Apr-68	17-Sep-92	17-Sep-92	GHS No.2 Lakki	
113	Muhammad Sadiq	Muhammad Safim	M/Sc	B.Ed	16	2-Dec-64	8-Oct-89	22-Nov-92	GHSS Sarai Naurang	appoint: as SST (Bio-chem)
114	Muhammad Rafiq	Muhammad Siddiq	MSc	M.Ed	16	15-Feb-67	10-Oct-87	24-Nov-92	GHS Ghazni Khel	appoint: as SST (M/Phy)
115	Shafiqat Ullah Khan	Abdul Latif Khan	MA	B.Ed	16	25-Sep-64	18-Nov-86	17-Feb-93	GMS Nar samand Adam Zai	
116	Zaka Ullah Khan	Muhammad Gul	BA	CT	16	10-Mar-72	17-Feb-93	17-Feb-93	GHS Wanda Aurangzeb	
117	Nemat Ullah Khan	Bahadar Khan	BA	CT	16	4-Apr-59	17-Feb-93	18-Feb-93	GHS Zafar Mama Khel	
118	Raf Ullah	Umer Daraz Khan	MA	M.Ed	16	9-Apr-66	18-Feb-93	18-Feb-93	GHSS Sarai Naurang	
119	Muhammad Yousof Khan	Muhammad Ayub Khan	MA	M.Ed	16	28-Apr-67	18-Feb-93	18-Feb-93	GMS Kechi Kamar	
120	Muhammad Iqbal Khan	Shah Khan	MA	B.Ed	16	26-Sep-68	18-Feb-93	18-Feb-93	GHS Isak Khel	appoint: as SST (M/Phy) X
121	Mir Qasim Khan	Munabac Khan	MA	B.Ed	16	1-Dec-69	18-Feb-93	18-Feb-93	GHHS Masha Mansoor	
122	Bin Yamin	Abdul Latif	MA	M.Ed	16	6-Feb-71	18-Feb-93	18-Feb-93	GHSS Shahbaz Khel	
123	Maid ur Rehman	Amjad Ali	MA	B.Ed	16	27-Mar-71	18-Feb-93	18-Feb-93	GMS Nasir Khel	appoint: as SST (Bio-chem)
124	Abdul Mo'jeed Khan	Zahir Zamran	EA	B.Ed	16	25-Dec-71	18-Feb-93	18-Feb-93	GMS Nasir Khel	
125	Mazir Ahmad	Bachir Ahmad	MA	B.Ed	16	20-Mar-73	18-Feb-93	18-Feb-93	GHS Titter Khel	
126	Ajmal Khan	Shah Khan	MA	B.Ed	16	9-Jan-75	20-Feb-93	20-Feb-93	GMS Ahmad Khel	
127	Muhammad Farooq Khan	Rashid Khan	MA	B.Ed	16	25-Oct-73	20-Feb-93	20-Feb-93	GMS Chowki Jand	
128	Sub Khan	Yasir Khan	BA	B.Ed	16	23-Jun-66	21-Feb-93	21-Feb-93	GMS Badni Khel	
129	Saleem Khan	Umer Khan	MSc	M.Ed	16	23-Apr-69	21-Mar-93	21-Mar-93	GMS No.2 Lakki	appoint: as SST (Bio-chem)
130	Ghulam Qasim Khan	Rab Nawaz Khan	MA	M.Ed	16	15-Apr-70	22-Mar-93	22-Mar-93	GHS Eegu Khel	
131	Muhammad Aziz	Abdul Aziz	BA	CT	16	15-Feb-62	28-Sep-83	1-Apr-93	GHS Saist Khel	

ATTESTED

48

49

132	Adil Jahangir	Ghulam Ali Khan	MA	M.Ed	16	13-Mar-62	1-Apr-93	1-Apr-93	GMS Nar Utam Garh	
133	Inayat ur Rehman	Mirbaz Khan	MA	CT	16	12-Apr-66	12-Jan-87	7-Apr-93	GHS Wanda Baru	
134	Muhammad Munir Khan	Muhammad Hassan Khan	MA	B.Ed	16	7-Apr-66	23-May-93	23-May-93	GMS Kotka Mehmood	
135	Noor Zaman	Gul Rehman	MA	B.Ed	15	18-Feb-69	21-Nov-94	21-Nov-94	GHS Kheru Khel Pacca	
136	Shahzada Khan	Maikhel	MA	B.Ed	15	1-Jan-70	21-Nov-94	21-Nov-94	GMS Chandu Khel	
137	Shams ur Rehman	Ghad Marjan	BA	B.Ed	15	25-Jan-71	22-Nov-94	22-Nov-94	GHS Zangi Khel	
138	Samar Gul	Haji Ghulam Qasim	MA	B.Ed	15	16-Apr-67	28-Nov-94	28-Nov-94	GHS Begu Khel	
139	Farid Ullah Khan	Aman Ullah Khan	MA	B.Ed	15	2-Jan-70	18-Dec-94	18-Dec-94	GHS Kheru Khel Pacca	
140	Quli Khan	Was Khan	MA	B.Ed	15	24-Feb-63	18-Nov-86	22-Dec-94	GHS Jabu Khel	
141	Farid Ullah Khan	Muhammad Hanif	BA	B.Ed	15	11-Apr-69	18-Feb-95	18-Feb-95	GMS Sarai Naurang	
142	Sher Nawaz Khan	Muhammad Nawaz Khan	MA	B.Ed	15	15-Mar-67	22-Oct-90	25-May-95	GHS Ghazni Khel	
143	Inayat Ullah Khan	Jana Khan	MA	M.Ed	15	5-Apr-70	16-Oct-90	25-May-95	GHS Sarai Naurang	
144	Aftab ud Din	Said Amin	BA	CT	15	2-Oct-65	31-Dec-86	1-Sep-95	GHS Shamoil Khatak	
145	Muhammad Shafi	Muhammad Sher	BA	CT	15	5-May-65	23-Sep-84	15-Jan-96	GHS Mama Khel Marwat	
146	Hameed Ullah Khan	Wasan Khan	BA	B.Ed	15	27-Sep-64	23-Sep-84	10-Jan-96	GHS Gandi Khan Khel	
147	Muhammad Ghulam	Afzal Khan	BA	CT	15	14-Sep-64	7-Nov-93	19-Jan-96	GHS Masha Mansoor	
148	Muhammad Saleem Khan	Abdul Wahab	MA	B.Ed	15	24-Aug-61	28-Nov-85	22-Jan-96	GHS Khawaja Khel	
149	Safdar Khan	Abdul Ghofar	MSc/EA	B.Ed	15	2-Dec-65	17-Nov-86	22-Jan-96	GMS Chowd Jand	
150	Hameed Ullah Khan	Muzafar Khan	MA	B.Ed	15	8-Mar-65	21-Sep-85	23-Jan-96	GHS Masha Mansoor	
151	Jalil Khan	Muzafar Khan	MA	CT	15	8-Jan-52	22-Mar-87	1-Feb-96	GHS Kheru Khel Pacca	
152	Khalig Reza	Hakim Khan	BA	CT	15	15-Mar-67	12-Sep-87	1-Feb-96	GHS Chezni Khel	
153	Jahanzeb	Nadir Khan	BA	CT	15	2-Jan-70	8-Oct-83	2-Feb-96	GHS Ismail Khel Abba Khel	
154	Raj Muhammad Qureshi	Ghulam Muhammad Qureshi	MA	M.Ed	15	1-Jan-63	12-Sep-87	3-Feb-96	GHS Wanda Amir	
155	Farid ullah	Wasan Khan	MA	B.Ed	15	18-Feb-69	12-Sep-87	4-Feb-96	GMS Nar Utam Garh	
156	Niamat Ullah Khan	Gul Jalil Khan	BA	B.Ed	15	1-Apr-64	22-Oct-83	1-Apr-96	GHS Sarai Naurang	
157	Shamsulhaq	Muhammad Ahmad Ali	MA	M.Ed	15	10-Sep-64	22-Sep-85	11-Apr-96	GHS Sarai Naurang	
158	Muhammad Bashir Khan	Sher Ahmad Khan	MSc	B.Ed	15	1-Apr-71	18-Apr-96	18-Apr-96	GHS Sarai Naurang	
159	Sher Ahmad Khan	Anam Khan	BA	B.Ed	15	10-Oct-58	22-Oct-83	24-Apr-96	GHS Chuhar Khel	
160	Habib Shah	Ghulam Rasool	BA	CT	15	5-Jan-64	14-Sep-87	11-May-96	GHS Begu Khel	
161	Muhammad Rafiq	Ghulam Farid	BA	CT	15	1-Aug-67	4-Jun-96	4-Jun-96	GHS No. 3 Lakki	
162	Niamat Ullah	Ajaz Khan	BA	CT	15	10-Apr-68	6-Jun-96	6-Jun-96	GMS Pahar Khel Pacca	
163	Muhammad Ayub Khan	Sher Ali Khan	MA	B.Ed	15	14-Mar-65	23-Sep-85	6-Nov-95	GMS No.1 Tajori	
164	Zahid Ullah Khan	Muhammad Ali Khan	BA	CT	15	4-Jan-64	22-Oct-83	7-Nov-95	GHS Khawaja Khel	

ATTESTED

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166	Fayyaz Ali Khan	Sardar Ali Khan	MA	CT	15	11-Oct-70	11-Apr-93	10-Nov-96	GHS No. 3 Lakki	
167	Imam Ullah Khan	Payao Khan	MSc	B.Ed	15	1-Jul-70	11-Nov-95	11-Nov-96	GHS Sarai Naurang	
168	Muhammad Usman	Mosam Khan	MA	M.Ed	15	2-Mar-68	18-Oct-88	14-Nov-96	GHS Khan Khel Mandozai	
169	Mir Aslam Khan	Habib Khan	MA	CT	15	24-Mar-62	27-Apr-85	17-Nov-96	GHS Darlo Khel	
170	Muhammad Ayub Khan	Muhammad Akbar Khan	BA	CT	15	25-Dec-65	12-Sep-87	17-Nov-96	GHS Mangala	
171	Mir Alam Khan	Mir Kalam Khan	MA	M.Ed	15	5-Oct-66	16-Sep-86	17-Nov-96	GCMHS No. 1 Lakki	
172	Muhammad Zameer	Hazrat Mir Khan	BA	B.Ed	15	4-Dec-53	4-Nov-76	18-Nov-96	GHS Nasha Mansoor	
173	Abdul Majeed Khan	Abdul Haleem Khan	BA	CT	15	15-Mar-65	23-Sep-84	18-Nov-96	GHS Harama Tala	
174	Niamat Ullah	Badshah Khan	MA	B.Ed	15	24-Dec-66	12-Sep-87	18-Nov-96	GHS Abba Khel	
175	Abdus Samad	Amir Mukhtar	MA	B.Ed	15	1-Dec-68	17-Nov-96	28-May-97	GHS Sarai Naurang	
176	Rafi Ullah Khan	Abdullah Khan	M/com	CT	15	14-Aug-65	25-Jul-97	26-Jul-97	GMS Mir Mandi Multan	
177	Ahmad Raza	Janat Khan	MSc	M.Ed	15	28-Mar-73	26-Jul-97	26-Jul-97	GHS Pahar Khel Tal.	appoint: as SST (M/Phy)
178	Hameed Ullah Jan	Sultan Jan	BA	CT	15	8-Dec-96	26-Jul-97	26-Jul-97	GHS Chuhar Khel	
179	Abdur Razaq Khan	Hazrat Umer	MSc	B.Ed	15	10-Jan-66	10-Nov-93	28-Jul-97	GHS Bachkn Ahmad Zai	
180	Hayat Ullah	Abdus Sattar Khan	MA	M.Ed	15	6-Feb-63	28-Jul-97	28-Jul-97	GHS Zafar Mama Khel	
181	Mashal Khan	Ayaz Khan	BA	CT	15	3-Aug-56	1-Nov-81	1-Aug-97	GMS Warghar	
182	Hukam Khan	Habib Khan	MA	B.Ed	15	18-May-53	16-Sep-85	1-Aug-97	GHS Kotla Hayat Ullah	
183	Aslam Shah	Mujib Shah	MA	M.Ed	15	13-Apr-67	4-Aug-97	4-Aug-97	GHS Nar Muhammad Ghazni Khel	
184	Sakhi Atarjan	Magnawaz Khan	MA	CT	15	15-Oct-63	12-Aug-97	12-Aug-97	GMS Mina Khel	
185	Zain Ullah Khan	Mushke Alam	MSc	B.Ed	15	24-Jan-62	17-Jan-98	17-Jan-98	GHS Titter Khel	appoint: as SST (M/Phy)
186	Sahibzade Ahmad Ullah Jan	Hazrat Abdul Nanan Safie	BA	CT	15	23-Apr-66	8-Oct-79	1-Apr-99	GMS Dubak Mandra Khel	
187	Asmat Ullah	Akbar Khan	MA	B.Ed	15	4-Mar-60	27-Oct-78	5-Apr-99	GMS Kakka Khel	
188	Mir Abbas Khan	Muhammad Saeed	MA	B.Ed	15	3-Aug-63	15-Dec-82	6-Apr-99	GHS Zangi Khel	
189	Mashal Khan	Mir Mast	BA	CT	15	12-Jan-64	22-Oct-83	6-Apr-99	GHS Mandan Manji Wala	
190	Fahid Ullah	Mir Bas	MSc	B.Ed	15	4-Jun-72	5-Apr-99	6-Apr-99	GHS Darra Fezu	appoint: as SST (M/Phy)
191	Niamat Ullah Khan	Samand Khan	BA	CT	15	5-Feb-62	16-Nov-82	8-Apr-99	GMS Zer Janu	
192	Abdul Jalil	Amir Sardar	MA	B.Ed	15	15-May-62	27-Sep-81	8-Apr-99	GMS Gandhi Umer Chiker	
193	Imad Iqbal	Amir Dost Khan	MA	B.Ed	15	6-Aug-67	28-Nov-83	8-Apr-99	GMS Wanda Mir Alam	
194	Abdul Qayum Khan	Badr Usaman	MA	CT	15	15-Dec-70	1-Sep-94	9-Apr-99	GHS Kotra Nawab Khan	
195	Muhammad Saleem	Muhammad Ghulam	MSc	B.Ed	15	5-Jan-73	13-May-82	14-Apr-99	GMS Pahar Khel Tal	appoint: as SST (M/Phy)
196	Amir Shah Iqbal	Anam Jan	MSc	B.Ed	15	8-Nov-70	15-Jan-86	24-Apr-99	GMS Pahar Khel Tal	
197	Yousaf Jan	Muhammad Hayat Khan	BA	CT	15	15-Apr-62	9-May-82	6-Nov-99	GHS Muth Shahab Khel	
198	Noor Alam Khan	Musa Khan	MA	M.Ed	15	1-Nov-60	5-Jan-85	2-Jun-99	GMS Abba Khel	(FR)

**ATTESTED**



44

200	Ikram Ullah	Faiz Ullah Khan	MA	B.Ed	15	10-Jan-69	23-Dec-99	23-Dec-99	GMS Asmat Abad	
	Mahab ur Rehman	Daraz Khan	MA	B.Ed	15	28-Mar-70	23-Dec-99	23-Dec-99	GHS Ghazni Khel	
201	Mirza Ali Khan	Gul Rehman	BA	CT	15	25-Dec-61	20-Dec-82	24-Dec-99	GHS Behram Khel	
202	Basit Ullah Shah	Muhab Ullah Khan	MA	B.Ed	15	20-Jan-69	23-Dec-99	24-Dec-99	GMS Nar Samand Adam Zai	
203	Bashir Ahmad	Muhammad Afzal	MA	B.Ed	15	8-Mar-69	24-Dec-99	24-Dec-99	GMS Nar Surana Khan	
204	Muhammad Hafiz ur Raman	Sher Muhammad	MSc	CT	15	15-May-69	24-Dec-99	24-Dec-99	GHS Dallo Khel	
205	Javed Iqbal	Aman Ullah Khan	MA	B.Ed	15	1-Aug-75	24-Dec-99	24-Dec-99	GHSS Abba Khel	
206	Raham Zad Khan	Muhammad Ali Khan	MA	B.Ed	15	16-Apr-64	29-Dec-99	29-Dec-99	GMS Abba Khel	
207	Ahamd Khan	Bahadar Sher	BA	CT	15	7-Apr-62	4-Dec-85	31-Dec-99	GMS Landi Mir Salam	
208	Sabim Khan	Muhammad Aslam Khan	BA	CT	15	12-Mar-60	17-Nov-83	1-Jan-00	GHS Jabu Khel	
209	Muhammad Farid Khan	Zar Jan	BA	B.Ed	15	1-Jan-61	15-Dec-82	1-Jan-00	GMS Nasir Din Begu Khel	
210	Abdullah Jan	Abdul Malik	BA	CT	15	7-Jan-62	22-Oct-83	1-Jan-00	GMS Wazir Kala	
211	Inam ullah khan	Sultan Gul	MA	CT	15	10-Jan-63	9-Dec-81	1-Jan-00	GHS Zafar Mama Khel	
212	Muhammad Daud Khan	Ayaz Khan	BA	CT	15	4-Nov-63	22-Oct-83	1-Jan-00	GHS Chuhar Khel	
213	Zahir Shah	Aqal Shah	MA	B.Ed	15	3-Apr-65	26-Sep-84	1-Jan-00	GHS Mandan Manji Wala	
214	Farid Ullah Shah	Muhammad Ajmal Khan	MA	B.Ed	15	20-Sep-65	24-Nov-85	1-Jan-00	GMS Adam Zal	
215	Saeed Ur Rehman	Khoidad Khan	MA	B.Ed	15	7-Nov-66	1-Sep-84	1-Jan-00	GCMHS No.1 Lalki	
216	Asmat Ullah Khan	Qismat Ali Khan	MA	B.Ed	15	12-Apr-67	25-Nov-85	1-Jan-00	GHS No.2 Lalki	
217	Khalid Usman	Amir Sahib Khan	MA	M.Ed	15	3-Feb-71	1-Jan-90	1-Jan-00	GHSS Sarai Naurang	
218	Musawar Gul	Hamesh Gul	BA	CT	15	2-Mar-88	6-Dec-91	1-Jan-01	GHS No.1 Tajori	
219	Aziz Ullah Khan	Ghulam Muhammad khan	MA	CT	15	28-Mar-66	12-Feb-92	12-Feb-02	GHS Wanda Shahab Khel	
220	Mohammad Ashraf	Sahib Noor	MA	B.Ed	15	3-May-68	14-Oct-92	1-Aug-02	GHS No.1 Tajori	
221	Ghulam farid khan	Muhammad Salim	MA	B.Ed	15	28-Jun-68	4-Oct-90	1-Sep-02	GHS No.1 Tajori	
222	Muhammad Yasin	Muhammad Aslam	MA	B.Ed	15	1-Jan-69	6-Dec-90	1-Sep-02	GHHS Abba Khel	
223	Rahmat ullah khan	Gul aslam khan	MA	B.Ed	15	1-Sep-69	3-Feb-90	1-Sep-02	GHS Nar Muzafar Khan	
224	Muhammad Suleman Nasir	Muhammad Ayaz	M.Phil	M.Ed	15	25-Sep-69	5-Dec-90	1-Sep-02	GHS Tap Takhti Khel	
225	Muhammad Ayaz	Muhammad Ayaz	MA	B.Ed	15	30-Apr-70	1-Sep-94	1-Sep-02	GHS, No.3 Lalki	
226	Amir Sahib Khan	Haqdad Khan	MA	B.Ed	15	13-Apr-70	8-Mar-90	1-Sep-02	GMS Mir Azam Michen Khel	
227	Mutabar Khan	Said Mir	MA	B.Ed	15	7-Feb-71	23-Apr-91	1-Sep-02	GHS No.2 Lalki	
228	Asmat Ullah	Abdul Ghafoor	MA	M.Ed	15	25-Feb-72	11-Apr-93	1-Sep-02	GHHS Abba Khel	
229	Saleem ullah Khan	Nawab Khan	MA	B.Ed	15	14-Mar-72	3-May-99	1-Sep-02	GCMHS No.1 Lalki	
230	Shafiqat Ullah Khan	Mir Salam Khan	MA	B.Ed	15	14-Apr-73	1-May-95	1-Sep-02	GHHS Kot Kashmir	
231	Abdul Gayum Khan	Ghulam Rasool	MA	CT	15	2-Sep-73	16-Apr-95	1-Sep-02	GHS Mela Shahab Khel	
232	Mesam Khan	Aslam Khan	MSc	B.Ed	15	2-Jun-73	3-May-95	1-Apr-04	GHS Land Ahmad Khel	

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45

233	Abdul Hanan	Abdul Manan	BA	CT	15	14-Mar-66	28-Oct-85	5-Apr-04	GHS Behram Khel	
234	Sher Dil Khan	Gul Azam Khan	MA	M.Ed	15	8-Oct-65	8-Oct-86	6-Apr-04	GMS Wanda Shamadu	
235	Amir Nawaz Khan	Gul Nawaz	MA	B.Ed	15	15-Jul-68	1-Oct-86	6-Apr-04	GHS Ihang Khel	
236	Rais Khan	Bahadar Khan	MA	CT	15	10-Feb-69	8-Dec-87	6-Apr-04	GMS Dallo Khel	
237	Niamat Ullah	Sardar Ali	MA	B.Ed	15	3-Dec-69	6-Apr-04	6-Apr-04	GMS Attashi Michen Khel	
238	Hafiz Hameed	Abdul Hameed	MA	CT	15	27-May-78	6-Apr-04	6-Apr-04	GHS Kot Kashmir	
239	Sami Ullah	Masti Khan	MA	M.Ed	15	1-Oct-75	7-Apr-04	7-Apr-04	GHS Jabu Khel	
240	Gul Akbar	Gul Marjan	BA	CT	15	7-Sep-64	25-Nov-85	8-Apr-04	GHS Tabi Murad	
241	Ali Muhammad	Sultan mehmood	MA	B.Ed	15	1-Jan-67	29-Sep-85	8-Apr-04	GHS Dallo Khel	
242	Muhammad Ali Khan	Muhammad Nawaz Khan	MA	CT	15	6-Jan-67	4-Dec-86	8-Apr-04	GHS Darra Pezu	
243	Hidayat Ullah Khan	Saad ullah Khan	MA	B.Ed	15	15-Jul-68	8-Dec-86	8-Apr-04	GHS Abdul Khel	
244	Hidayat Ullah Khan	Saad ullah Khan	MA	B.Ed	15	12-Sep-69	12-Dec-87	8-Apr-04	GMS Ahmad Khel	
245	Muhammad Ismail	Ajab Gul	MA	B.Ed	15	8-Mar-59	25-Apr-85	13-Apr-04	GHS Sarai Naurang	
246	Noor Wali Khan	Rais Khan	BA	CT	15	8-Mar-59	25-Apr-85	13-Apr-04	GHS Landiwah	
247	Muhammad Akhbar	Ghazi Marjan	BA	B.Ed	15	6-Nov-63	6-Oct-82	1-Jun-04	GMS Sultan Abad kot kashmir	
248	Ahizar Hayat	Umer Hayat	BA	CT	15	10-Feb-60	15-Nov-86	2-Jun-04	GHS Nar Muzafar Khan	
249	Noor Aslam Khan	Muhammad Munir Khan	MA	B.Ed	15	11-Mar-66	15-Jul-96	30-Jul-04	GHS Kotka Hayat Ullah	
250	Abdul Qayum Khan	Muhammad Saeed Khan	BA	CT	15	1-Dec-63	18-Nov-86	1-Sep-04	GHS Nar Muzafar Khan	
251	Muhammad Jalil	Akhtar Nawaz	BA	CT	15	12-Aug-64	25-Apr-83	1-Sep-04	GHS Zangi Khel	
252	Muhammad Din	Abdur Rahim	MA	M.Ed	15	15-Jul-65	12-Sep-87	1-Sep-04	GHS Zangi Khel	
253	Sakir Mar Jan	Sarwar Jan	MA	CT	15	1-Sep-67	1-Sep-04	1-Sep-04	GHS Harama Tala	
254	Farmah Ullah	Mir Salam Khan	MA	CT	15	26-Oct-68	12-Sep-87	1-Sep-04	GHS Kot Kashmir	
255	Shafeeq Ullah	Faiz Ullah Khan	MA	B.Ed	15	10-Jan-69	12-Sep-87	1-Sep-04	GHS Kot Kashmir	
256	Muhammad Iqbal Khan	Haji Azal shah	BA	CT	15	13-Jan-69	1-Sep-04	1-Sep-04	GHS Shuhbar Khel	
257	Habib Khan	Awal Khan	MA	B.Ed	15	4-Feb-69	26-Apr-87	1-Sep-04	GHS Zangi Khel	
258	Farmah Ullah Khan	Mazullah	MSc	B.Ed	15	17-Apr-72	1-Sep-01	1-Sep-04	GHS Wanda Amir	appoint: as SST (M/Phy)
259	Muhammad Zaman	Akbar Ali Khan	MSc	B.Ed	15	3-Apr-73	15-Apr-96	1-Sep-04	GHS Abba Khel	appoint: as SST (bio-chem)
260	Muhammad Rehan	Abdul Hanan	MSc	B.Ed	15	1-Nov-74	1-Sep-04	1-Sep-04	GHS Wanda Amir	
261	Ismat Ullah Khan	Muhammad Ali Khan	MA	B.Ed	15	20-Apr-69	30-Apr-87	6-Apr-05	GHS Wanda Amir	
262	Muhammad Riaz	Barkat Ullah Khan	MA	M.Ed	15	10-Apr-71	21-Feb-98	7-Apr-05	GHS Isak Khel	
263	Muhammad Amin	Muhammad Yousaf	MA	M.Ed	15	25-Mar-68	12-Sep-87	8-Apr-05	GHS Ghazni Khel	
264	Siyal Badshah	Adam Khan	MSc	M.Ed	15	10-Nov-71	3-May-99	9-Apr-05	GHS Taja Zai	appoint: as SST (M/Phy)
265	Gul Rehman Khan	Abdur Rahim Khan	BA	B.Ed	15	15-Apr-67	1-Jan-86	9-Apr-05	GHS No. 2 Larki	
266	Hayat Ullah	Dilwar Khan	BA	B.Ed	15	20-Nov-65	24-Sep-87	12-Apr-05	GHS Adam Zai	

- 8 Sahib
- 9 Miran
- 10 Raza
- 11 Ghazi
- 12 Haroon
- 13 Saif ur
- 14 Muham
- 15 Bashir K
- 16 Mir Kabu
- 7 Sher Bah
- 9 Abdur Ras
- 10 Ahmad Jan
- 11 Anwar Kh
- Abdur Rash
- Mir Abbas kh
- 12 Iqbal Ghani
- 13 Hafiz Muhammad
- 14 Abdul Majeed
- 15 Iqbal Khan
- 16 Muhammad Sa
- 17 Gul Hanan

**ATTENDED**

46

266	Muhammad Aslam Khan	Aze Ullah Khan	BA	B.Ed	15	10-May-53	22-Jan-76	12-Apr-05	GHS Ahmad Khel	
267	Mir Khan	Abdul Hayee Khan	BA	B.Ed	15	1-Mar-64	21-Mar-93	12-Apr-05	GMS Ghazi Khel	
268	Sharif Ullah Khan	Aman Ullah Khan	MA	B.Ed	15	24-Jul-67	13-Apr-05	13-Apr-05	GMS Nar Surana Khan	
270	Sharif Ullah Khan	Aman Ullah Khan	BSC	B.Ed	15	24-Jul-67	13-Apr-05	13-Apr-05	GMS Nar Surana Khan	
271	Inam Ullah	Niaz Muhammad	BA	CT	15	9-Apr-73	13-Apr-05	13-Apr-05	GHHS Masha Mansoor	
272	Noor Muhammad Din	Qazi Ikram ud Din	BA	CT	15	10-Apr-68	12-Sep-87	14-Apr-05	GHS Tap Takhti Khel	
273	Amir Hatam Khan	Sher Zaman Khan	MA	CT	15	20-Feb-70	14-Apr-05	14-Apr-05	GMS Gandhi Umer Chiker	
274	Shah Nawaz Khan	Muhammad Nawaz Khan	MA	B.Ed	15	11-Feb-68	12-Sep-87	20-Apr-05	GMA Wanda Kuttana	
275	Ijaz Rasool	Abdur Raouf	MA	B.Ed	15	6-Mar-71	16-Apr-96	20-Apr-05	GMS Multan Manji Wala	
276	Muhammad Ibrahim Khan	Muhammad Nawaz Khan	MSc	M.Ed	15	11-Feb-73	30-Apr-05	30-Apr-05	GMS Zer Janu	appointt: as SST (bio-chem)
277	Zahid Ullah Khan	Baid Ullah Jan	MA	B.Ed	15	1-Jul-69	1-Sep-94	1-May-05	GHS Daraka Aziz Khan	
278	Inam Ullah Khan	Inayat Ullah Khan	MSc	B.Ed	15	5-Aug-79	2-May-05	2-May-05	GHHS Masha Mansoor	
279	Naqib ur Rehman	Aziz ur Rehman	MA	M.Ed	15	6-Sep-66	12-Sep-87	6-May-05	GMS, Daulti	
280	Samar Gul	Muhammad Gul	BA	B.Ed	15	17-Apr-69	12-Sep-87	10-May-05	GHS No.2 Lakki	
281	Muhammad Atzal Khan	Sher Zaman	MA	B.Ed	15	11-Feb-72	30-May-95	21-May-05	GHS Bachkn Ahmad Zal	
282	Aslam Khan	Noor Khan	BA	B.Ed	15	18-Feb-62	9-Mar-83	31-Aug-06	GHS Nawar Khel	
283	Gul Rashid Khan	Ghulam Muhammad Khan	BA	CT	15	20-Dec-66	6-Oct-88	31-Aug-06	GHS, Shakh Qullli Khan	
284	Khan Zaman	Akbar Zaman	MA	CT	15	14-Dec-61	9-Oct-90	1-Sep-06	GMS Chandu Khel	
285	Ghulam Mustafa	Noor Zaman	MA	B.Ed	15	17-Jul-64	1-Oct-86	1-Sep-06	GMS Tor Lawang Khel	
286	Suljoqar	Abdul Ghafar	BA	B.Ed	15	4-Mar-66	10-Feb-87	1-Sep-06	GMS Zar Khan surband	
287	Sher Nawaz Khan	Sayyed Alam Khan	BA	CT	15	17-Oct-66	21-Mar-87	1-Sep-06	GMS Warghar	
288	Khan Nawaz	Rab Nawaz	MA	B.Ed	15	14-Feb-68	12-Sep-87	1-Sep-06	GHS Mela Shahab Khel	
289	Muhammad Jehanzab	Aurangzeb	MA	CT	15	14-Jun-69	1-Sep-06	1-Sep-06	GMS, Nazar Jan Behattani	
290	Khalil ur Rehman	Habib Khan	MSc	B.Ed	15	1-Jan-71	1-Sep-06	1-Sep-06	GHS Ismail Khel Abba Khel	appointt: as SST (M/Phy)
291	Barkat Ullah Khan	Muhammad Nawaz Khan	MA	B.Ed	15	28-May-76	1-Sep-06	1-Sep-06	GMS Ghazi Khel	
292	Muhammad Khurshid Khan	Naeem Khan	MA	B.Ed	15	22-May-70	19-Oct-88	5-Sep-06	GMS Ahmad Khel	
293	Habib Ur Rehman	Ghulam Habib	BA	CT	15	20-Mar-67	25-Apr-87	6-Sep-06	GHS Wanda Shahab Khel	
294	Ali Marjan	Abdullah Jan	MSc	B.Ed	15	10-Jan-76	1-Sep-04	6-Sep-06	GMS Nar Muhammad Ghazi Khel	
295	Noor Aslam Khan	Ahmad Khan	MBA	B.Ed	15	27-Nov-78	6-Sep-06	6-Sep-06	GHS Ahmad Khel	
296	Waheed Murad	Janan	MSc	B.Ed	15	28-Mar-71	5-Oct-06	5-Oct-06	GHS Nar Muzafar Khan	
297	Shahzada Khan	Muzaffar Khan	BA	CT	15	3-Jul-65	6-Oct-88	6-Oct-06	GHS Baist Khel	
298	Afsar Ali Khan	Inayat Ullah	MA	B.Ed	15	7-Sep-66	13-Oct-87	6-Oct-06	GHSS Sarai Naurang	
299	Niamat Ullah	Mosam Khan	BA	CT	15	10-Sep-68	12-Sep-87	6-Oct-06	GHS, Shakh Qullli Khan	
300	Masih Ullah	Saad Ullah Khan	BA	CT	15	30-Mar-69	23-Apr-84	10-Oct-06	GHS Tap Takhti Khel	

ATTESTED

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UF

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303	Maslin Khan	Adad Bakht Khan	BA	B.Ed	15	7-Jul-69	27-Jan-88	16-Oct-06	GHS Tap Tahti Khel
304	Masib Ali Shah	Dary Shah	BA	CT	15	10-Jan-58	19-Apr-87	19-Dec-06	GHS Sarai Naurang
305	Khan Muhammad	Nalik Muhammad	MA	CT	15	24-Jan-66	27-Apr-87	19-Dec-06	GHS Behram Khel
306	Amin Khan	Umar Khan	BA	M.Ed	15	15-Oct-66	8-Oct-88	20-Dec-06	GHS Wanda Shahab Khel
307	Shakeel Ahmad	Muhammad Shah	MSc	M.Ed	15	20-Apr-79	23-Dec-06	23-Dec-06	GHS Mangala
308	Sakhi Jan	Fazal Khan	BA	CT	15	6-Feb-66	19-Oct-88	1-Jan-07	GHS Bachin Ahmad Zal
309	Abdur Rehman Khan	Ghulam Habib Khan	MA	B.Ed	15	25-Apr-64	3-Apr-85	1-Oct-07	GHS Mash Masti Khani
310	Ibrahim Khan	Abbas Khan	BA	CT	15	10-Mar-65	25-Apr-87	1-Oct-07	GHS Ghazni Khel
311	Farhat Ullah	Rehmat Ullah Khan	MSc	M.Ed	15	27-Dec-77	9-Mar-09	9-Mar-09	GMS Langer Khel Pacca
312	Abdul Waheed Khan	Shah Wali Khan	MA	B.Ed	15	1-Mar-77	14-Feb-08	31-Mar-09	GMS Nasir Din Begu Khel
313	Muhammad Iqbal Khan	Muhammad Hashim Khan	BA	CT	15	13-Apr-63	22-Sep-85	30-Apr-09	GHS Pahar Khel Pacca
314	Ayaz Khan	Nawaz Khan	MA	B.Ed	15	4-Mar-71	29-Jan-90	30-Apr-09	GHS Jhang Khel
315	Inam Ullah Khan	Nasir Jan	MA	M.Ed	15	1-Feb-79	30-Apr-09	30-Apr-09	GHS Nawar Khel
316	Muhammad Rashid Khan	Ghulam Hassan	MSc	M.Ed	15	15-Mar-81	30-Apr-09	30-Apr-09	GMS Nar Taj Muhammad
317	Shah Alam Khan	Hashim Khan	MA	B.Ed	15	3-Jan-82	25-May-09	25-May-09	GHS Shamoni Khatak
318	Waheed ur Rehman	Aziz ur Rehman	MA	CT	15	3-Mar-81	11-Jun-09	11-Jun-09	GHS Meja Mandra Khel
319	Noor Zaman	Ghazi Marjan	BA	CT	15	10-Apr-73	13-Apr-05	27-Aug-09	GHS Attashi Michen Khel
320	Fakhar Zeb Khan	Abdul Aziz	MA	M.Ed	15	26-Apr-81	24-Feb-10	24-Feb-10	GHS Nar Muzafar Khan
321	Abdul Waheed	Juma Khan	MA	B.Ed	15	16-Apr-69	26-Mar-10	26-Mar-10	GHS Mama Khel Marwat
322	Muhammad Iqbal Khan	Zar Gul Khan	BA	CT	15	6-Sep-73	2-May-09	3-Apr-10	GHS Adam Zal
323	Akhtar Munir Shah	Faridoon Shah	BSc	CT	15	22-Jan-89	20-Apr-10	20-Apr-10	GHS Sultan Abad kot Kashmir
324	Muhammad Jamil Khan	Abdullah Jan	MA	CT	15	15-Aug-65	30-May-10	30-May-10	GHS Tari Khel
325	Muhammad Rehman	Pir Rehman	MSc	CT	15	25-Jan-85	27-Oct-10	27-Oct-10	GHS Wanda Baru
326	Waheed Ullah Khan	Hameed Ullah Jan	MA	B.Ed	15	23-Mar-76	4-Nov-10	4-Nov-10	GMS Asmat Abad
327	Fakhar ul Islam	Muhib Ullah Khan	MSc	B.Ed	15	20-Nov-80	4-Nov-10	4-Nov-10	GMS Langer Khel Pacca
328	Aziz ur Rehman	Abdul Qayyum	MA	B.Ed	15	10-Feb-81	4-Nov-10	4-Nov-10	GMS Uttar Khel
329	Domsaz Khan	Amir Hamza	MA	CT	15	16-Apr-78	11-Nov-10	11-Nov-10	GHS No.2 Tajori
330	Nazar Jan	Muhammad Jan	BA	CT	15	1-Jan-64	4-Nov-85	15-Aug-11	GHS Ghazni Khel
331	Mir Nawaz Khan	Mir Afzal Khan	MSc	B.Ed	15	5-Jan-80	4-Jan-10	11-May-12	GHS No.2 Tajori
332	Arab Khan	Adam Khan	MSc	B.Ed	15	25-Mar-83	11-May-12	11-May-12	GHS Ghazni Khel
333	Kalim Ullah Khan	Muhammad Hashim Khan	MSc	B.Ed	15	2-Sep-85	11-May-12	11-May-12	GHS Wanda Aurangzeb
334	Syed Qaisar Abbas	Syed Samar Abbas	MA	CT	15	6-Mar-87	11-May-12	11-May-12	GHS Landwah
335	Mas Ullah Marwat	Niamat Ullah	M.Phil	CT	15	26-Dec-72	1-Sep-04	12-May-12	
336	Sikandar Shah	Karim Shah	MSc	B.Ed	15	10-Apr-73	24-Jul-04	12-May-12	

Appointed through Public Exam

APPOINTED

48

336	Ali Khan	Khan zaman	MA	B.Ed	15	2-Apr-75	1-Sep-04	12-May-12	GMS, Hayat Khel	
337	Mirshad Ullah Khan	Muhammad Azeem Khan	MSc	CT	15	6-Feb-79	12-May-12	12-May-12	GHHS Landiwah	
337	Iqram Ullah Khan	Amir payo jan	MSc	B.Ed	15	24-Feb-81	12-May-12	12-May-12	GHHS Landiwah	
338	Sami Ullah Khan	Muhammad Ghulam	MSc	B.Ed	15	15-Feb-86	12-May-12	12-May-12	GHS Jhang Khel	
339	Haibat Khan	Ghani Rehman	MA	B.Ed	15	15-Sep-60	16-Aug-81	27-Feb-13	GHHS Kot Kashmir	coming from other District

Prepared by

Checked by

Verified

Countersigned

District Education Officer  
(Male) Lakki Marwat

*Muhammad*  
Deputy District Education Officer  
(Male) Lakki Marwat

**ATTENDED**

(49)

**WAKALATNAMA**

IN THE COURT OF Service Tribunal KP Peshawar.

Navceeb Ullah

(Petitioner)  
(Plaintiff)  
(Applicant)  
(Complainant)  
(Decree Holder)

**V E R S U S**

EDD Laki Masawat Etc

(Respondent)  
(Defendant)  
(Accused)  
(Judgment Debtor)

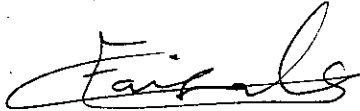
Case F.I.R No. \_\_\_\_\_, Dated \_\_\_\_\_, P/S \_\_\_\_\_

Charge U/S \_\_\_\_\_

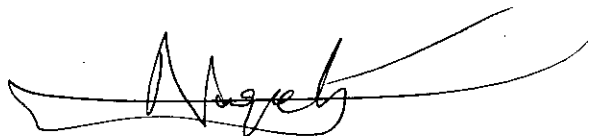
I, We, Appellant

The above noted Service Appeal do hereby appoint and constitute **Shah Faisal Ilyas, Advocate High Court and Federal Shariat Court of Pakistan** to appear. Plead, act, compromise, withdraw or refer to arbitration to me/ us as my/ our Counsel in the above noted matter, I/ we also authorized the said Counsel to file appeal, revision, review, application, and make any miscellaneous application in Criminal/ Civil matters or arising out of the matter and to withdraw and receive in my/ our behalf all sums and amounts deposited on my/ our account in the above noted matter.

**ATTESTED & ACCEPTED**



**Shah Faisal Ilyas**  
Advocate High Court,  
Peshawar  
Office: "Deans Plaza"  
LG 137 A  
Peshawar Cantt.  
Cell: 0300-5850207



**CLIENT/CLIENTS**

117

7/3/17

**BEFORE THE HONOURABLE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHWAR**

Service Appeal No:909/2015

Naqeeb UllahKhan CT(M) Posted at GMS Sattar Bettani Tehsil & District Lakki Marwat.

(Appellant)

**VERSUS**

1. Executive District officer Elementary & secondary Education Lakki Marwat.
2. District officer (M) Elementary & Secondary Education Lakki Marwat.
3. Government of khyber Pakhtun khwa , through Secretary Education Department ,Civil Secretariat ,Peshawar.
4. Director Schools and Literacy Department ,G T Road Khyber Pakhtun Khwa,Peshawar.
5. Secretary Schools And Literacy Department, Civil Secretariat, Peshawar.
6. District Accounts Officer, Lakki Marwat.
7. A.D.O Elementary & Secondary Education Near P.O. Tajazia Town, Lakki Marwat.

**Respondents**

**Preliminary Objections:**

1. That the appellant has got no cause of action.
2. That the appeal is bad for non joinder and mis-joinder of unnecessary parties.
3. That the appeal in hands is not maintainable in the present form.
4. That the appeal in hands is barred by law, rules and regulations.
5. That the appellant has come to the Tribunal with unclean hands and concealed the actual facts from the Honourable Tribunal.
6. That the seniority of the appellant is considered according to the date of his taking over charge i.e 7-12-2012.
7. that there is no final order hence the instant appeal is not maintable U/S 4 of Service Tribunal Act.
8. That this Honorable Tribunal has no jurisdiction to adjudicate the matter.
9. That the seniority has been given in accordance with judgment of Honorable High Court dated 05/12/2012. So Rule 23 of Service Tribunal Rules applicable to the instant appeal.

**Respectfully Sheweth,**

The respondents most humbly submit the Para wise written comments as under.

1. That Para No (1) pertains to record, needs no comments.
2. The Para (2) also pertains to record, needs no comments.

3. That Para (3) is incorrect. The appellant did not take over the charge in the said school.
4. The Para (4) is incorrect. The appellant did not take over charge on his previous order.
5. The Para (5) is incorrect. The appellant did not attend the school because he has not taken over charge in the side school before 07-12-2012 A.N
6. That Para (6) is incorrect. Appellant failed to take over charge in due date, Therefore he was not entitled for salary. The appellant has not impleaded the Head Master of the said school.
7. That Para (7) is correct to the extent that appellant filed writ petition in Peshawar High Court Bench Bannu. The Honourable High Court disposed off the writ petition with the direction "That the respondents shall issue appointment order of the petitioner within a week positively " The appellant was not re-instated therefore he is not entitled for back benefits but his appointment order was revised. (Copy of decision of the High Court is attached annexure "A").
8. That Para (8) is incorrect. The appellant is not re-instated but his appointment order was revised with the conditions. The appellant took over charge on 7-12-12 After Noon according to order No 10628 dated 7-12-2012 (Copy of charge report & appointment order date 7-12-2012) is Annexed as annexure "B"
9. That Para (9) is incorrect. The appellant seniority will be considered after taking over charge as per rules and regulations. However did not challenged any seniority list.
10. That Para (10) pertains to High court record, needs no comments.
11. That Para (11) is incorrect. As per rules & regulation seniority of every civil servant is considered with effect from the date of taking over charge. The appellant is not aggrieved as per rules & regulations because his seniority will be considered as per his charge report date i.e. 7-12-2012.
12. As per Para No. 9
13. No Comments.
14. No Comments.

Reply on the grounds are as under.

#### Grounds

A. That Para (A) is incorrect. The seniority of the appellant will be considered after taking over charge on his present post. The appellant is regularly drawing his salary after taking over charge in the light of judgment of Peshawar High Court Bench Bannu. The appellant deliberately concealed the real fact from the Honourable Tribunal.





B. That Para (B) is incorrect. The appellant is treated in accordance with law, rules & regulation of the civil servant.

C. That Para (C) is incorrect. Relief is granted to the appellant in the light of judgment of Peshawar High Court Bench Bannu. The appellant is regularly drawing his salary and his seniority will be considered as per his date of taking over charge.

D. That Para (D) is incorrect. The appellant was satisfied from the judgment of the Honourable Peshawar High Court Bench Bannu. Therefore the appellant has not filed an appeal against the judgment of High Court in August Supreme Court of Pakistan. Seniority will be given to the appellant as per his date of taking over charge i.e. 7-12-2012 (AN)

E. That Para (E) is incorrect. The appellant is regularly drawing his salary after taking over charge and his seniority will be considered with effect from his date of taking over charge i.e. 7-12-2012. Respondents always follow the rules & regulation of the Government.

F. That Para (F) is incorrect. The appellant is regularly drawing his salary with effect from taking over charge on the present post. His seniority will be considered from the date of taking over charge i.e. 7-12-2012. Appointment order dated 25-12-2011 is revised by the respondent in the light of judgment of the Honourable Peshawar High Court Bench Bannu. vide order 10628-35 dated 7-12-2012 with the conditions.

G. That Para (G) is incorrect. Respondents always follow the rules & regulation of the Government. The appellant is drawing his salary regularly with effect from date of taking over charge.

H. That Para (H) is incorrect. The order dated 7-12-2012 is issued in the light of Honourable Peshawar High Court Bench Bannu (copy is already annexed with the appeal)

I. That Para (I) needs no comments.

It is therefore humbly solicited that in the light of the above Para wise written comments the service appeal in hands may graciously be dismissed with special cost.

Respondent No 1&2



District officer (M) Elementary & Secondary  
Education

4/3/17

Respondent No 3&5

Secretary Elementary & Secondary Education  
Khyber Pakhtun Khwa Peshawar.

Respondent No 4:

Director Elementary & Secondary Education,  
Khyber Pakhtun Khwa Peshawar.

Respondent No 7:

A.D.O Elementary & Secondary Education Lakki Marwat

AFFIDAVIT

I, Mr. Sharif Ullah Khan A.D.E. Education office of D.E. (Male) Education Lakki Marwat do hereby solemnly affirm and declare on oath that the contents of the instant reply are true and correct to the best of my knowledge and belief and nothing has been kept or concealed from this Honourable Tribunal.

DEPONENT

Dated: -06.03.2017.

(SHARIF ULLAH KHAN)

25

Judgment Sheet  
IN THE PESHAWAR HIGH COURT, BANNU  
BENCH  
JUDICIAL DEPARTMENT  
W.P. No.339-B/2011

JUDGMENT

Date of hearing: 05.12.2012

Petitioner(s) : Nagibullah Khan son of Muhammad  
Zaman resident of Umar Abad  
Tajori Lakki Marwat by Muhammad  
Usman Khan and Mr. Inamullah  
Khan (Kakki), advocates.

Respondent(s) : Government of Khyber  
Pakhtunkhwa through Secretary  
Education, Department,  
Peshawar, Executive District  
Officer (E)&(S) Education, Lakki  
Marwat and others by Mr.  
Ahmed Farooq Khattak,  
Additional Advocate-General.

NISAR HUSSAIN KHAN, J :- This<sup>st</sup> petition is disposed of in light of our detailed findings given in our common judgment of even date, placed in connected WP No.339-B/2011, titled, "Ihsanullah Vs Govt. of Khyber Pakhtunkhwa through Secretary Education etc".

Announced:  
05.12.2012

*sd/ NISAR HUSSAIN KHAN J*  
*sd/ Roubul Amin Khan J*

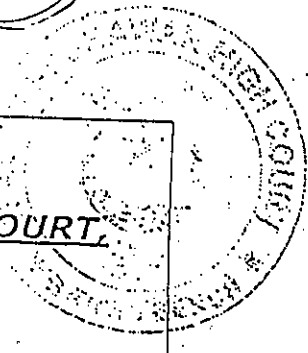
*sd/ [Signature]*

CERTIFIED TO BE TRUE COPY

W. Amin  
Peshawar High Court Bannu Bench  
Established Under Article 37 of  
The Constitution of Pakistan 1973

(116)

(28)



Judgment Sheet  
IN THE PESHAWAR HIGH COURT,  
BANNU BENCH  
JUDICIAL DEPARTMENT

W.P. No.339-B/2011

JUDGMENT


Date of hearing: 05.12.2012

Petitioner(s) : Ihsanullah son of Watan Khan  
resident of Mohallah Azizan  
Daloo Khel District Lakki Marwat  
by Muhammad Usman Khan and  
Mr. Inamullah Khan (Kakki),  
advocates.

Respondent(s) : Government of Khyber  
Pakhtunkhwa through Secretary  
Education, Department,  
Peshawar, Executive District  
Officer (E)&(S) Education, Lakki  
Marwat and others by Mr.  
Ahmed Farooq Khattak,  
Additional Advocate-General.

NISAR HUSSAIN KHAN, J :- By way of this  
common judgment, we are going to dispose of  
instant writ petition as well as connected W.P.  
No.337-B/2011, filed by Liaq Shah and W.P.  
No.338-B/2011, filed by Naqibullah Khan, as  
common question of law and fact is involved in  
all the three petitions.

ATTESTED

  
EXAMINER  
Peshawar High Court,  
Bannu Bench

(27)

2. In response to an advertisement floated by the respondents on 11.05.2010 in "Daily Aaj", in respect of the Posts of C.Ts. General (Male), all the three petitioners, being eligible for the Posts, submitted applications for their appointments. Ihsanullah petitioner of W.P. No.339-B/2011, was appointed on Retired Employees sons quota, after undergoing through necessary formalities of Medical Test, vide Endst. No.2119-24/CT (M), by the then Executive District Officer E&S Education Lakki Marwat, while Liaq Shah and Naqibullah Khan (petitioners of WP No.337-B/2011 and WP No.338-B/2011) respectively, were enlisted at S.No.1 and 2, of the merit-list, prepared after necessary test and interview. After fulfillment of necessary legal formalities, both were appointed in BPS.09 vide same appointment order, mentioned-above and their appointment was purely on merit, as per merit-list prepared by the respondents.

3. Later on, new incumbent, EDO Lakki Marwat, circulated a handwritten order on 14.03.2011 to D.Os/D.D.Os (M/F) that he has

ATTESTED

EXAMINER  
Peshawar High Court,  
Banne Bazar


28

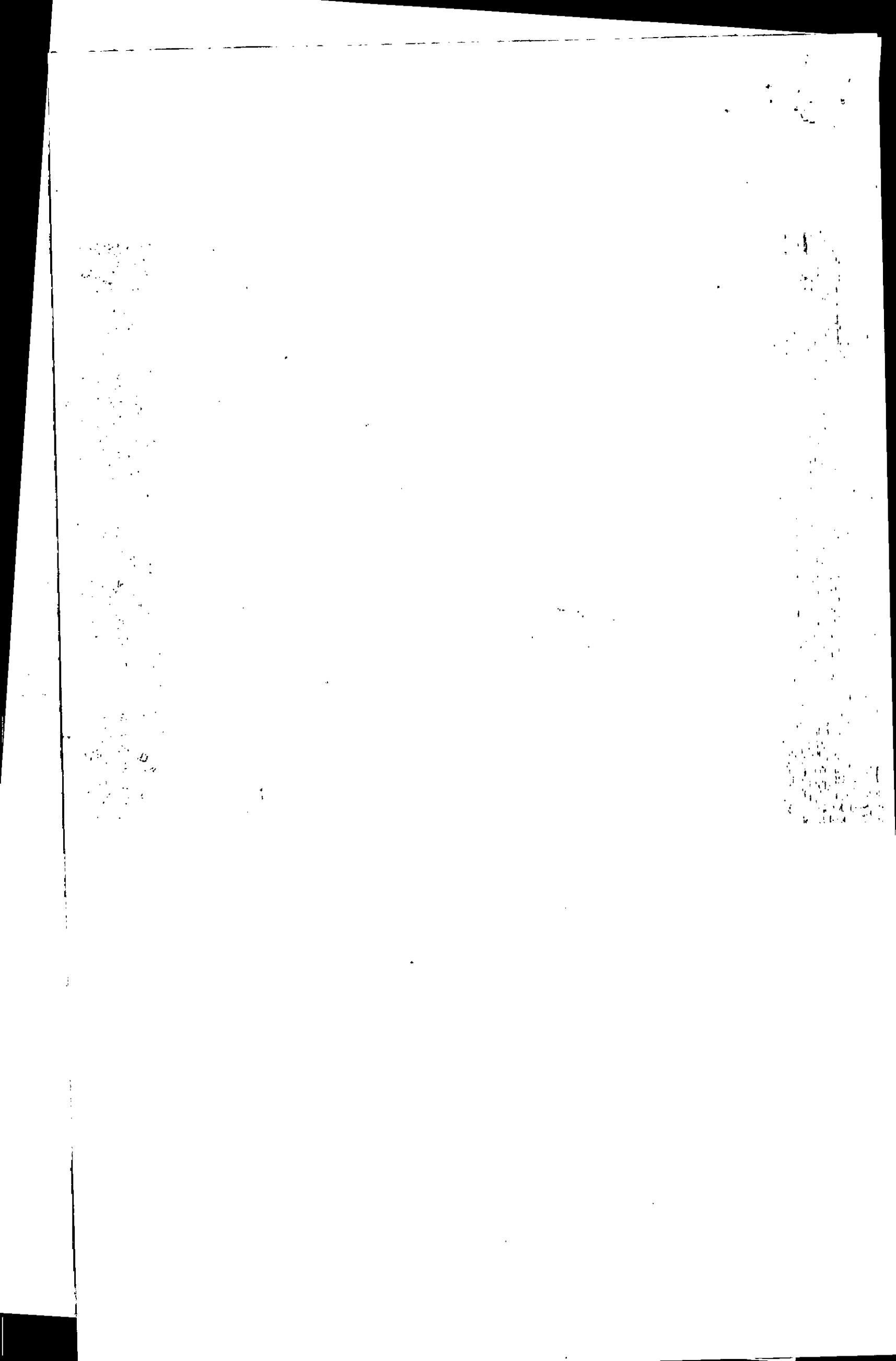
117

received large number of written as well as verbal complaints about different appointments, so they should not submit the source proforma to the District Accounts Officer, for release of their salaries, without his counter sign, failing which, they will be responsible for the consequences. On the basis of this order, all the three petitioners were restrained from performance of their duties and their salaries were also not released. On the basis of same advertisement great number of appointments were made, against various posts, against which there were general complaints, but all other appointees were given charge and their salaries were released. Only the petitioners were discriminated, without assigning any reason for the discriminatory treatment meted out to them. The only defence of the respondents was that there was an inquiry underway against the illegal appointments. But we are afraid to note with concern that said inquiry has not seen the light of the day, as yet, despite passage of about 02 years. It is also noted with concern that no

AS

ATTESTED

  
 EXAMINER  
 Deshwar High Court,  
 Varanasi Bench



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118

5. In view of the concurrence of the parties, without dilating upon the merits of the case in detail, we direct that the respondents shall issue appointment orders of all the three petitioners within a week, positively. All the three petitions are allowed in the above terms.

Announced:  
05.12.2012

sd/ Nisay Hussain Khanj  
sd/ Rounaq Amin Khanj

*Handwritten signature/initials*

CERTIFIED TO BE TRUE COPY

*Handwritten signature*

Examiner - 15-12-12  
The Under Secretary to Government of  
Jammu & Kashmir  
Jammu

S.No	1485	_____
Date of Birth	_____	_____
No of Pages	10P	_____
Case	_____	_____
Urgency	1	_____
Tech.	20/-	_____
Date	_____	_____
On	15-12-12	_____
By	15-12-12	_____
At	15-12-12	_____
By	Jamunji Khanj	_____



appointment

اپنی جگہ پر لے کر آئے گا۔ اس کے لئے ایک نوٹیفکیشن جاری کیا گیا ہے۔

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OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E & S) EDUCATION LAKKI MARWAT

OFFICE ORDER:-

In pursuance of the directions of Hon: Peshawar High Court Bench Bannu on 05-12-2012 and in continuation to this office appointment order No.2119-24/CT(M) Dated 25-02-2011, the three candidates of below named are directed to take over their charge in the schools with immediate effect, shown against each in the above mentioned appointment order.

1. Mr.Laiq Shah S/O Nabi Shah R/O Gandi Khan Khel.
2. Mr. Naqib Ullah Khan S/O Muhammad Zaman R/O Umar Abad.
3. Mr.Ihsan Ullah S/O Watan Khan R/O Dallo Khel.

Note:- Their appointment will be subject to the enquiry result already conducted by the Competent authorities.

Executive District Officer  
(E&S) Education Lakki Marwat

Endst.No. 10628-35

Dated 7-12/12

Copy to the:-

1. Secretary to Govt: of Elementary & Secondary Education Deptt: Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. District Coordination Officer, Lakki Marwat.
4. District Accounts Officer, Lakki Marwat.
5. Additional Registrar Peshawar High Court, Bannu Bench.
6. Additional Advocate General Peshawar High Court Bannu Bench.
7. Head Master concerned schools.
8. Official concerned.

Executive District Officer  
(E&S) Education Lakki Marwat

**ATTACHED**

In Continuation to EDO (E&S) Lakki Marwat's appointment order No. 2119-24 dated 25-2-2011 appointed against C.T Post vide EDO (E&S) Lakki Marwat's appointment order No. 10628-35 dated 7-12-2012.

(507)

بہ خارج الرورٹ سے ترقی کی کورٹ سے فیصلے کے لئے اور جس کی کاپی

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LEAF NUMBER 248 Form No. 10 TO 2005 (G)/PW/1/Form No. 10/A/1/02

CERTIFICATE OF TRANSFER OF CHARGE 7/12/2012 (AM)

1. Certified that we have on the fore/afternoon of this day respectively made over and receive charge of this office of the... Executive District Officer, Larkana... order No. 2119-24... of Mr. Nagibullah Khan C.T. (G.) dated: 07/12/2012.
2. Particulars of cash and important secret and confidential documents handed over are noted on the reverse:—

31

Signature of relieved Government servant... Ghulam Farid

Designation... C.T.

Station... Govt. High School No. 1, Taji

Signature of relieving Government servant... Nagibullah Khan

Designation... C.T.

Dated... 07/12/2012

~~COLLECTED~~

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

Service Appeal No. 909/2015

Naqeeb Ullah Khan CT (M) GMS Sattar Bettani Tehsil &  
District Lakki Marwat.....(Appellant)

**V E R S U S**

Executive District Officer E&SE, Lakki Marwat  
and others.....(Respondents)

**REJOINDER ON BEHALF OF APPELLANT.**

**Respectfully Sheweth:**

**Preliminary Objection:**

1. Para No. 1 is incorrectly phrased, the appellant has accrued the cause of action, thus the instant appeal.
2. Para No. 2, that the parties are properly made by the appellant, thus the objection of mis-joinder and non-joinder makes no sense.

3. Para No. 3, that the appeal is maintainable in its present form.
4. Para No. 4, that the appellant in hand is as per law and rules, regulation on the subject, thus the objection is incorrect.
5. Para No. 5 is incorrectly phrased that is why in detail no facts so called concealed is given, thus the appellant is with clean hands.
6. Para No. 6, that the seniority is considered from the date of 2<sup>nd</sup> joining while the appellant 1<sup>st</sup> joining was neglected by the respondents, more so the respondents in their comments admitted that the charge should be in continuation to the office appointment order No. 2119-24 CT (M) dated 25/02/2011.
7. Para No. 7, that the instant para is incorrectly phrased because the appellant dully made appeal to the high-up's, but the respondents were adamant to disposed of the same, thus the instant appeal before

this august Tribunal was filed, after the laps of given time for disposal of appeal.

8. Para No. 8 is incorrectly phrased, because this Hon'ble Tribunal has the jurisdiction to adjudicate the matter.
9. Para No. 9 is also incorrectly phrased, because the seniority is not given from due date of taking over first charge.

**REPLY ON FACTS:**

- 1&2. As Para-1 & 2 reply is not given, thus needs no rejoinder being admitted.
3. Para No. 3 is incorrectly phrased, the appellant did took charge in the said school.
- 4&5. Para No. 4 and 5 are incorrectly phrased, because as the appellant was refused to give salary and was verbally told to stop working that is way the Writ Petition was filed.

6. Para No. 6 is incorrect because the Headmaster is the employees of the respondent department, thus appellant deem it no proper to make him as a necessary party, and being took the charge over there entitled for the seniority against that very 1<sup>st</sup> joining.
7. Para No. 7 is incorrectly phrased for the reason that as per the order issued by EDO E&SE Lakki Marwat the date of appointment should be reckoned from the continuation of the office order dated 25/02/2011, thus entitled for the seniority and salary against that.
8. Para No. 8 is incorrectly phrased again for the reason that the Hon'ble Apex Court of Bannu Bench held the order of the stoppage of the appointing authority to be null and void, thus that very first order of appointment should be taken into consideration for seniority and other perks and privileges of the appellant/ employee.
9. Para No. 9 is incorrect and malafide came of the respondents in the shape of a Show Cause notice

issued to the appellant, reply of which is also given by the appellant and the rules and regulations on the subject and law is violated too.

10. As Para No. 10 is admitted, thus needs no rejoinder.

11&12. As the appellant seniority is not considered from the date of his 1<sup>st</sup> Appointment because the word of continuation is used by the respondents, thus the law, rules and regulations on the subject is violated.

13&14. Para No. 13 and 14 is given no comments, thus admitted, needs no rejoinder.

**REPLY TO THE GROUNDS:**

A. Ground "A" is incorrect for the reason that the word continuation is used in the order of respondents, thus they withdraw from their own order, which needs interference of this Hon'ble Tribunal.

B. Ground "B" is incorrectly phrased, the respondents violated the law, rules and regulation of the seniority of the Civil Servant.

- C. Ground "C" is incorrect, the judgment of the Hon'ble Peshawar High Court, Bannu Bench is violated and was not followed in latter in sprit.
- D. Ground "D" is incorrect for the reason that the instant appeal is filed here because the proper forum is this august Tribunal.
- E. Ground "E", the seniority is given beyond the date of the 1<sup>st</sup> appointment of the appellant, thus needs consideration.
- F. Ground "F" is incorrect, the appellant is drawn his salary under pretest from the taking of charge of his 2<sup>nd</sup> order in which the word continuation is used, thus the same needs revised by the competent authority and needs consideration from that very day, thus violated the judgment spirit too.

G&H. Grounds "G" & "H" are incorrectly phrased, the respondents violated the principles and rules, and disown their own order verdict.



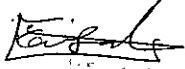
- I. Ground "I" is given no comments, hence needs no rejoinder being admitted.

It is, therefore, most humbly prayed that on acceptance of this rejoinder, this Hon'ble Tribunal may graciously be pleased to accept the Service Appeal, as prayed for.

Applicant

Through

Dated: 05/04/2017

  
**Shah Faisal Ilyas**  
Advocate High Court,  
Peshawar.

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

Service Appeal No. 909/2015

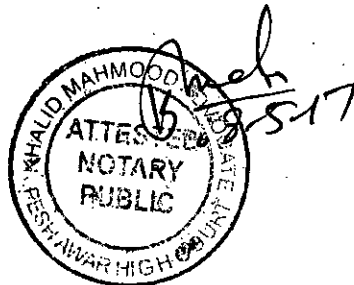
Naqeeb Ullah Khan CT (M) GMS Sattar Bettani Tehsil &  
District Lakki Marwat.....(Appellant)

**V E R S U S**

Executive District Officer E&SE, Lakki Marwat  
and others.....(Respondents)

**AFFIDAVIT**

I, Naqeeb Ullah Khan CT (M) GMS Sattar Bettani Tehsil &  
District Lakki Marwat, do hereby solemnly affirm and declare,  
that the contents of the **Rejoinder** are true and correct to the  
best of my knowledge and belief and nothing has been  
concealed from this Hon'ble Court.



*Naqeeb*

**DEPONENT**