

Cost of Rs. 5000 received in Service Appeal No. 1540/23,

Titled Pervez Kamal VS. EDU

in the office of Superintendent Vide Order 25/1/24

Dated: 4/13 /2024.



**SUPERINTENDENT**  
Khyber Pakhtunkhwa  
Service Tribunal, Peshawar

BEFORE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL,  
PESHAWAR

Service Tribunal Appeal No. 1540 of 2023

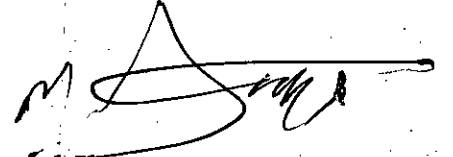
Pervez Kamal

Versus

Secretary Elementary & Secondary Education, KP and others

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**Muhammad Ilyas**  
District Education officer  
(M) Lakki Marwat

07-03-2024  
Peshawar  
S.B.

BEFORE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL,  
PESHAWAR

Service Tribunal Appeal No. 1540 of 2023

Pervez Kamal

Versus

Secretary Elementary & Secondary Education, KP and others

Written Reply on behalf of Respondent No. 2 & 3.

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 11575

Dated 04-03-2024

Respectfully Sheweth:

**Preliminary Objections:**

- A. The appeal is wholly incompetent and untenable.
- B. That the appellants has not impleaded the necessary parties.
- C. The appellants has not come to the Hon'ble tribunal with clean hands.
- D. The appeal is filed by the appeal with malafide intent.
- E. The appeal is suffer from exaggeration and mis-statement.
- F. The appellants has no locus standi and cause of action.
- G. The appellants has not come to the Hon'ble Tribunal with clean hands. The appeal also suffers from mis-statement and concealment of facts and as such the appellants is not entitled to any relief.
- H. The appeal is liable to be dismissed due to non-joinder and mis-joinder as Mr. Zakrya Khan, on whose appeal the wrong promotion of appellants was withdrawn.
- I. That appeal been filed within the prescribed period, hence instant appeal being time barred is liable to be dismissed.
- J. That the appeal is barred by law and limitation.

**REPLY ON FACTS:**

1. That Para No.1 pertains to record.
2. That Para No. 2 also pertains to record.

3. That Para No.3. It is submitted that the appellant was wrongly promoted and one Mr. Zakria Khan was senior to the appellant, who was left from promotion inadvertently, hence on the appeal of Mr. Zakria Khan, Mr. Zakria Khan being senior was promoted and adjusted, while the appellant's promotion was withdrawn.
4. That Para No.4. The appellant joined the duty but he was mistakenly promoted to the said post, which was rightly withdrawn.
5. That Para No.5. As mentioned in above para, the appellant was mistakenly promoted.
6. That Para No.6 is incorrect. The appellant was at the serial No.431 in the seniority list, while Mr. Zakria Khan was at serial No.417. The appellant was wrongly promoted, where against, Mr. Zakria Khan filed departmental appeal, which was accepted and Mr. Zakria Khan was promoted, while appellant's wrong promotion order was withdrawn. The appellant concealed actual facts and also didn't challenged the promotion or seniority of Mr. Zakria Khan, hence this appeal is not maintainable in present form. **(Copy of departmental appeal of Mr. Zakria and Final Seniority list are annexure-A & B)**
7. That Para No.7 pertains to record.
8. That the instant appeal is illegal and filed to pressurize department, therefore is liable to be dismissed.

**REPLY ON GROUNDS:**


- a) That Para-A is incorrect. The appellant's wrong promotion was effecting the seniority of Mr. Zakria Khan, hence the withdrawal of appellant's promotion was made as per law and rules.


- b) That Para No. B is incorrect. The competent authority has exercised his power in accordance with law and as per policy. Here it is pertinent to mention that in the promotion order of appellant at serial No.7 of terms & conditions, it was clearly stated that wrong promotion will be withdrawn, hence the competent authority has rightly withdrawn the appellant's promotion order.
- c) That Para No. C. It is submitted that the seniority of Mr. Zakria Khan was and is undisputed, hence on the appeal of Mr. Zakria Khan, the appellant's wrong promotion was withdrawn and Mr. Zakria Khan was promoted as per law and rules. It is pertinent to mention that the appellant has not disputed the seniority of Mr. Zakria Khan, hence this appeal is not maintainable.
- d) That Para No. D is incorrect. The wrong promotion order didn't create rights in favor of civil servant, while in the case of appellant, the fundamental rights of promotion of Mr. Zakria Khan were effected. Moreover, it was mentioned in the serial No.7 of terms & condition of promotion orders, that wrong promotion will be withdrawn, hence the appellant's wrong promotion order was withdrawn.
- e) That Para No. E is incorrect. The appellant's promotion order was wrong and invalid as the rightful candidate Mr. Zakria Khan was withheld from the promotion.
- f) That Para No. F. It is submitted that no prior notice was required by law, as the competent authority has the power and authority to withdraw the promotion order of appellant.
- g) That Para No.G is incorrect.
- h) That Para No. H. It is submitted that Mr. Zakria Khan senior to the appellant and was more eligible and deserving for promotion and due to wrong promotion of appellant the valuable rights of Mr. Zakria Khan were effected, hence for

complete justice, the appellant's promotion order was withdrawn.

- i) That Para I. It is submitted that no discrimination is done by the competent authority.
- j) That Para J. It is submitted that withdrawal of promotion order of appellant and promotion of well deserving employee Mr. Zakria Khan was made as per law and policy and no illegality or irregularity has been done by the respondents.
- k) That the counsel of the respondents may please be allowed to raise further points at the time of the arguments.

**It is, therefore, most respectfully prayed that the appeal of the appellant may kindly be dismissed with special compensatory costs coupled with expenses of litigation.**

  
Samina Altaf  
Director  
Elementary & Secondary Education  
h (R.No.3, 2)

  
Muhammad Ilyas  
District Education Officer (M)  
Lakki mrwat  
(R.No.3)

## AFFIDAVIT

I, Muhammad Ilyas District Education Officer Male Lakki Marwat, do hereby solemnly affirm and declare upon oath that the contents of the accompanied written reply are true and correct to the best of my knowledge and belief and nothing has been intentionally concealed from this Hon'ble Tribunal. It is further added on oath that in this appeal the answering respondent have neither been placed ex-parte nor their defense have been struck off.



4-3-24

Deponent

**Muhammad Ilyas**  
**District Education Officer (M)**  
**Lakki Marwat**



مخارجت حساب ڈسٹرکٹ ایجوکیشن آفیسر (DEO) مردانہ

عنوان: (Bio/Classification) SST کو پروموشن کرنے کے لئے درخواست

حساب عالی

گزارش ہے کہ سائل P.S.H.T پوسٹ پر ملک و قوم کی خدمت کر رہا ہے۔ کو الیگیشن کے مطابق سائل (B/c) SST کے لئے اہل ہے اور سفارشی لیست (updated on 21-2-22) میں سائل کا سیریل نمبر 412 ہے جبکہ دیگر P.S.H.Ts جو (B/c) SST کو پروموشن ہوئے ہیں، کے سیریل نمبرز بالترتیب 424 اور 426 ہے۔ اور سائل ان سے سینئر ہے۔ لیکن سائل کا نام پروموشن لیست سے رہ گیا ہے۔ حالانکہ سائل نے متعلقہ ASDBO صاحب کے پاس تمام متعلقہ ڈاکومنٹس بعد ACR جمع کئے تھے لہذا آپ صاحبان میرٹ پر مبنی سائل P.S.H.T کے پوسٹ کو پروموشن فرمادیں۔ اور سائل کے پروموشن کے لئے (B/c) SST جاری فرمادیں۔

الحاصل

سائل: نرگزیبا خان P.S.H.T جی بی ایس مکی خیل 13/01/2023  
 ڈسٹرکٹ ایجوکیشن آفیسر: 00348583  
 شناختی نمبر: 11201-9950333-7

Attested

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Annex - A1 (7) 21

**Office of The District Education Officer  
Male Lakki Marwat**

Phone & Fax: (0969)538291, Email: [amislakki@yahoo.com](mailto:amislakki@yahoo.com)  
[www.facebook.com/deomalelakki](http://www.facebook.com/deomalelakki), [www.twitter.com/deo\\_m\\_lakki](http://www.twitter.com/deo_m_lakki)

To

No. 693 / Dated: 18/01/2023

The Director  
E&SE Khyber Pakhtunkhwa  
Peshawar

Subject: Appeal in respect of Mr Zakria Khan PSHT GPS Guli Khel Betanni District  
Lakki Marwat for Promotion to the Post of SST (B/C)

Memo,

It refers to the subject cited above and to enclose herewith an application/appeal in respect of Mr Zakria Khan PSHT GPS Guli Khel Betanni District Lakki Marwat along with other relevant documents, working papers, PERs and original service book for consideration for promotion to the post of SST (B/C).

This office had displayed a seniority list of teachers before forwarding the working papers, PERs and other relevant documents to the Directorate of E&SE Khyber Pakhtunkhwa to be taken up / considered by Departmental Promotion Committee for promotion to the posts of SSTs. The applicant Mr Zakria Khan PSHT falls on S.No. 417 in the seniority list of Primary School Head Teachers (PSHTs) and his qualifications were mentioned as MA hence he was not considered being ineligible for promotion. The above quoted teacher did not raise any objection to missing of his educational qualifications in the seniority list at that time.

Now at the eleventh hour, the applicant approached this office arguing that he has passed biology (botany) and Chemistry as additional subjects from two separate varsities thus he is eligible for promotion to the post of SST (B/C). In its earlier meeting held on the Departmental Promotion Committee had deferred cases of teachers having additional subjects for promotion to the posts of SSTs. Now the DPC is again scheduled to meet on 19-01-2023 to take up suitability of deferred cases for promotion.

The promotion case in respect of Mr Zakria PSHT GPS Guli Khel Betanni District Lakki Marwat is forwarded to your good office with request to include and consider it in the Departmental Promotion Committee (DPC) for promotion to the post of SST (B/C) if he is eligible for promotion as per revised criteria for Additional subject please.

**Note: Necessary documents are enclosed.**

Allestred

Jw

M. A. S.  
District Education Officer  
(Male) Lakki Marwat

Annex - C (8) (25)  
**OFFICE OF THE DISTRICT EDUCATION OFFICER MALE LAKKI MARWAT**

**FINAL SENIORITY LIST OF PSHT (B-15) DISTRICT LAKKI MARWAT (Updated upto 21/02/2022)**

S.#	Teacher Name	S.D.S	Personal #	DOB	Date of 1st Appt:	Date of Appt as PSHT	QUALIFICATION		Present Circle	Present School	Remarks
							Acad;	Prof;			
382	MASHAL Khan	15	292766	2-9-1976	1-9-2004	14-11-2017	MA	PTC	Naurang	GPS Takhti Khel	
383	Niaz Muhammad	15	293553	12-3-1977	1-9-2004	14-11-2017	BA	PTC, B.Ed	Mina Khel	GPS Wanda Khana Gul	
384	IBRAHIM KHALIL	15	296991	9-5-1977	1-9-2004	14-11-2017	BA	PTC	Mash/Landiwah	GPS Kotka Ajab Khan Shamoni	
385	Muhammad FARMAN Ullah	15	331737	1-6-1977	1-9-2004	14-11-2017	MA	PTC, B.Ed	Mash/Landiwah	GPS YAQOOB ABAD SHAHAB KHEL	
386	Akram Khan	15	308287	10-9-1977	1-9-2004	14-11-2017	MA	PTC, B.Ed	Titter Khel	GPS No.3 Sheri Khel	
387	Muhammad AKRAM Khan	15	294494	13-1-1978	1-9-2004	14-11-2017	MA	PTC, CT, B.Ed	Gandi	GPS NAR Khan KHELAN	
388	GUL NAWAZ Khan	15	295517	10-10-1978	1-9-2004	14-11-2017	MA, Bsc	PTC, B.Ed	Mina Khel	GPS FAQIR KILLA DAKHLI Ahmad KHEL	Math/Phy
389	Zafar Khan	15	296225	2-2-1979	1-9-2004	14-11-2017	MA	PTC, CT, B.Ed	Titter Khel	GPS Kajoor Mala Khel	
390	RAFI Ullah Khan	15	338074	3-4-1979	1-9-2004	14-11-2017	MA	PTC, CT	Naurang	GPS FATEH Khan KHEL TAKHTI KHEL	
391	Muhammad Qasim	15	294463	1-9-1979	1-9-2004	14-11-2017	MA	PST, B.Ed	Tajazai	GPS Karim Jabu Khel	
392	Inayat Ullah	15	312999	12-1-1980	1-9-2004	14-11-2017	BA	PTC	Titter Khel	GPS Wanda Ahmad Khan	
393	IHSAN Ullah Khan	15	331757	6-2-1981	1-9-2004	14-11-2017	BA	PTC	Mash/Landiwah	GPS WANDA Aurangzeb	
394	HASHMAT Ullah	15	295797	3-3-1981	1-9-2004	14-11-2017	BA	PTC, B.Ed	Naurang	GPS SURANA NO.1	
395	IRFAN Ullah Khan	15	294010	1-4-1982	1-9-2004	14-11-2017	MA	PTC, CT, M.Ed	Mash/Landiwah	GPS Nasib Abad Mirazam	
396	Zardad Khan	15	293473	1-2-1972	3-5-1999	23-4-2019	BA	PTC	Gandi	GPS Baist Khel No.2 Sher Khel	
397	Muhammad Rauf Khan	15	331871	25-4-1973	1-9-2004	23-4-2019	MA	PTC	Mina Khel	GPS No.2 Ahmad Khel	
398	Abdul Jalil Khan	15	296337	28-10-1973	1-9-2004	23-4-2019	MA	PTC, B Ed	Naurang	GPS Zindri Akbar Khan	
399	Dil Jan	15	296089	17-4-1974	1-9-2004	23-4-2019	M.Phil	PTC, B.Ed	Naurang	GPS Madati Neka	
400	Fateh Ullah	15	313007	15-1-1975	1-9-2004	23-4-2019	MA	PTC-CT-B.Ed	Titter Khel	GPS Wanda Jogi	
401	Muhammad Gul	15	342006	10-1-1976	1-9-2004	23-4-2019	MA	PTC, CT, B.Ed	Mash/Landiwah	GPS No.2 Wanda Langer Khel	
402	Sami Ullah	15	312727	15-3-1976	1-9-2004	23-4-2019	MA	PTC	Tajazai	GPS AGARI KHANZAD KHEL	
403	Gul Rehman	15	295368	29-12-1976	1-9-2004	23-4-2019	M SC	PTC, B.Ed	Tajori	GPS Nar Awat Khel Bhattani	MTP
404	Zafar Iqbal	15	295151	1-1-1977	1-9-2004	23-4-2019	MA	PTC	Naurang	GPS Sarwar Mama Khel	
405	Gul Wali Khan	15	312827	3-6-1977	1-9-2004	23-4-2019	MA	PTC-CT	Titter Khel	GPS No.3 Kheru Khel Pacca	
406	Mir Ajab Khan	15	293713	19-11-1977	1-9-2004	23-4-2019	MA	PTC	Mina Khel	GPS No.2 Land Ahmad Khel	
407	Muhammad Jamil Khan	15	296174	11-4-1978	1-9-2004	23-4-2019	MA	PTC, CT	Mina Khel	GPS No.1 Daulat Khel	
408	Abdul Manan	15	293891	2-1-1979	1-9-2004	23-4-2019	B.SC	PTC, B.Ed	Tajuzai	GPS Similand Jabu Khel	
409	Muhammad Yousaf	15	208436	13-9-1972	13-4-2005	23-4-2019	M.Sc	PTC, CT, B.Ed	Naurang	GPS Naswair Kala	
410	Ahdus Samad	15	342215	30-3-1977	19-9-2006	23-4-2019	MA	PTC, B.Ed	Tajazai	GPS Muhammad Khel Jadeed	
411	Naqib Ullah	15	342214	5-4-1980	19-9-2006	23-4-2019	MA	PTC, B.Ed	Mash/Landiwa	GPS Dadiwala	
412	Amin Ullah Jan	15	351201	25-3-1969	13-10-2006	23-4-2019	MA	PTC, B.Ed	Naurang	GPS No 1 Marmandi Multan	
413	Abdul Ghafoor	15	348247	25-5-1973	13-10-2006	23-4-2019	MA	PTC, B.Ed	Naurang	GPS Purana Manjiwala	
414	Abdullah	15	351202	6-8-1974	13-10-2006	23-4-2019	MA	PTC	Tajori	GPS Kotka Mir Badshah	
415	Arab Khan	15	348570	4-7-1975	13-10-2006	23-4-2019	BA	PTC, CT, B Ed	Mina Khel	GPS Sheikh Khula	
416	Baqi Jan	15	348019	14-9-1976	13-10-2006	23-4-2019	MA	PTC	Titter Khel	GPS No.1 Ghazi Khel	
417	Zakria Khan	15	348593	3-11-1977	13-10-2006	23-4-2019	MA	PTC, CT, B.Ed	Tajori	GPS Guli Khel Britanni	
418	Aman Ullah Khan	15	349424	27-11-1977	13-10-2006	23-4-2019	MA	PTC, B.Ed	Naurang	GPS No 2 Kura Shadi Khan Marmandi	B/C
419	Kirammat Ullah Khan	15	351820	14-3-1978	13-10-2006	23-4-2019	MA	PTC, B.Ed	Naurang	GPS Kajor Takhti Khel	

Alloted

(BETTER COPY)  
OFFICE OF THE DISTRICT EDUCATION OFFICER MALE LAKKI MARWAT  
FINAL SENIORITY LIST OF PSHT (B-15) DISTRICT LAKKI MARWAT (Updated upto 21/02/2022)

S#	Teacher Name	BPS	Personal	DOB	Date of Ist Apptt	Date of Appt as PSHT	Qualification		Present Circle	Present School	Remarks
							Acad:	Prof:			
382	Mashal Khan	15	292766	02.09.1976	01.09.2004	14.11.2017	MA	PTC	Naurang	GPS. Takhti Khel	
383	Niaz Muhammad	15	293553	12.03.1977	01.09.2004	14.11.2017	BA	PTC, BEd	Mina Khel	GPS. Wanda Khana Gul	
384	Ibrahim Khalil	15	296991	09.05.1977	01.09.2004	14.11.2017	BA	PTC	Mash / Landiwah	GPS. Kotka Ajab Khan Shamoni	
385	Muhammad Farman Ullah	15	331737	01.06.1977	01.09.2004	14.11.2017	MA	PTC, BEd	Mash / Landiwah	GPS. Yaqoob Abad Shahab Khel	
386	Akram Khan	15	308287	10.09.1977	01.09.2004	14.11.2017	MA	PTC, CT, B.Ed	Titter Khel	GPS. No.3, Sheri Khel	
387	Muhammad Akram Khan	15	294494	13.01.1978	01.09.2004	14.11.2017	MA	PTC, CT	Gandi	GPS. Nar Khan Khelan	
388	Gul Nawaz Khan	15	295517	10.10.1978	01.09.2004	14.11.2017	MA, BSC	PST, BEd	Mina Khel	GPS. Faqir Killa Dakhli Ahmad Khel	Math / Phy
389	Zafar Khan	15	296225	02.02.1979	01.09.2004	14.11.2017	MA	PTC, CT, Bed	Titter Khel	GPS. Kajor Mala Khel	
390	Rafi Ullah	15	338074	03.04.1979	01.09.2004	14.11.2017	MA	PTC, CT	Naurang	GPS. Fateh Khan Khel Takhti Khel	
391	Muhammad Qasim	15	294463	01.09.1979	01.09.2004	14.11.2017	MA	PST, BEd	Tajazai	GPS. Karim Jabu Khel	
392	Inayat Ullah	15	312999	12.01.1980	01.09.2004	14.11.2017	BA	PTC	Titter Khel	GPS. Wanda Ahmad Khan	
393	Ihsan Ullah Khan	15	331757	06.02.1981	01.09.2004	14.11.2017	BA	PTC	Mash / Landiwah	GPS. Wanda Aurangzeb	
394	Hashmat Ullah	15	295797	03.03.1981	01.09.2004	14.11.2017	MA	PTC, BEd	Naurang	GPS. Surana No.1	
395	Irfan Ullah Khan	15	294010	01.04.1982	01.09.2004	14.11.2017	BA	PTC, CT, MED	Mash/ Landiwah	GPS. Nasib Abad Mirazam	
396	Zardad Khan	15	293473	01.02.1972	03.05.1999	23.04.2019	MA	PTC	Gandi	GPS. Basit Khel No.2 Sher Khel	
397	Muhammad Rauf Khan	15	331871	25.04.1973	01.09.2004	23.04.2019	MA	PTC	Minal Khel	GPS. No.2 Ahmad Khel	
398	Abdul Jalil Khan	15	296337	28.10.1973	01.09.2004	23.04.2019	M.PHILL	PTC, BEd	Naurang	GPS. Zindi Akbar Khan	
399	Dil Jan	15	296089	17.04.1974	01.09.2004	23.04.2019	MA	PTC, BEd	Naurang	GPS. Madati Neka	
400	Fateh Ullah	15	313007	15.01.1975	01.09.2004	23.04.2019	MA	PTC, CT, BEd	Titter Khel	GPS. Wanda Jogi	
401	Muhammad Gul	15	342006	10.01.1976	01.09.2004	23.04.2019	MA	PTC, CT, BEd, PTC	Mash / Landiwah	GPS. No.2 Wanda Langer Khel	
402	Sami Ullah	15	312727	15.03.1976	01.09.2004	23.04.2019	M.SC	PTC	Tajazai	GPS. Agari Khanzad Khel	
403	Gul Rehman	15	295368	29.12.1976	01.09.2004	23.04.2019	MA	PTC, BEd	Tajon	GPS. Nar Awat Khel Bhattani	
404	Zafar Iqbal	15	295151	01.01.1977	01.09.2004	23.04.2019	MA	PTC, CT	Naurang	GPS. Sarwar Mama Khel	
405	Gul Wali Khan	15	312827	03.06.1977	01.09.2004	23.04.2019	MA	PTC	Titter Khel	GPS. No.3 Kheru Khel Pacca	
406	Mir Ajab Khan	15	293713	19.11.1977	01.09.2004	23.04.2019	MA	PTC, CT	Mina Khel	GPS. No. 2 Land Ahmed Khel	
407	Muhammad Jamil Khan	15	296174	11.04.1978	01.09.2004	23.04.2019	B.SC	PTC, BEd	Mina Khel	GPS. No.1 Daulat Khel	
408	Abdul Manan	15	293891	02.01.1979	01.09.2004	23.04.2019	M.SC	PTC, CT, BEd	Tajazai	GPS. Sirbiland Jabu Khel	
409	Muhammad Yousaf	15	208436	13.09.1972	13.04.2005	23.04.2019	MA	PTC, BEd	Naurang	GPS. Naswair Kala	
410	Abdus Samad	15	342215	30.03.1977	19.09.2006	23.04.2019	BA	PTC, BEd	Tajazai	GPS. Muhammad Khel Jadeed	
411	Naqib Ullah	15	342214	04.04.1980	13.10.2006	23.04.2019	MA	PTC, BEd	Mash / Landiwah	GPS. Dadiwala	
412	Amin Ullah Jan	15	351201	25.03.1969	13.10.2006	23.04.2019	MA	PTC, BEd	Naurang	GPS. No.1 Muhammad Multan	
413	Abdul Ghafoor	15	348247	25.05.1973	13.10.2006	23.04.2019	MA	PTC, BEd	Naurang	GPS. Purana Manjiwala	
414	Abdullah	15	351202	06.08.1974	13.10.2006	23.04.2019	BA	PTC	Tajori	GPS. Kotka Mir Baadshah	
415	Arab Khan	15	348570	04.07.1975	13.10.2006	23.04.2019	MA	PTC, CT, BEd	Minal Khel	GPS. Sheikh Khula	
416	Baqi Jan	15	348019	14.09.1976	13.10.2006	23.04.2019	MA	PTC	Titter Khel	GPS. No.1 Ghazi Khel	
417	Zakria Khan	15	348583	03.11.1977	13.10.2006	23.04.2019	MA	PTC, CT, BEd	Tajori	GPS. Gul Khel Bhattani	
418	Aman Ullah Khan	15	349434	22.11.1977	13.10.2006	23.04.2019	MA	PTC, BEd	Naurang	GPS. No.2 Kotka Shadi Khan Marmandi	B/C
419	Kirammat Ullah Khan	15	351880	14.03.1978	13.10.2006	23.04.2019		PTC, BEd	Naurang	GPS. Tajori Takhti Khel	

*Alisa*

OFFICE OF THE DISTRICT EDUCATION OFFICER MALE LAKKI MARWAT

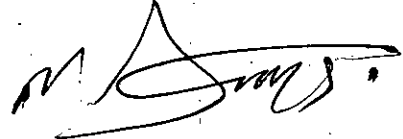
FINAL SENIORITY LIST OF PSHT (B-15) DISTRICT LAKKI MARWAT (Updated upto 21/02/2022)

S.#	Teacher Name	B/S	Personal #	DOB	Date of 1st Apptt:	Date of Appt as PSHT	QUALIFICATION		Present Circle	Present School	Remarks
							Acad;	Prof;			
420	Noor Aslam Khan	15	348026	24-4-1978	13-10-2006	23-4-2019	MA	PTC-CT, Bed	Mash/Landiwa	GPS No.5 Wanda Shahab Khel	
421	Wahid Ullah Khan	15	295653	7-11-1978	13-10-2006	23-4-2019	MSC	PTC	Mash/Landiwa	GPS Wanda Mir Hassan Landiwah	
422	Zaka Ullah Khan	15	348220	19-11-1978	13-10-2006	23-4-2019	MA	PTC	Mash/Landiwa	GPS Bahadar Zaman Pahari	
423	Farid Ullah Khan	15	348590	16-1-1979	13-10-2006	23-4-2019	MA, B.Sc	PTC, CT, B.Ed	Mina Khel	GPS No.1 Langer Khel Hathi Khan	M/P
424	Saif Ullah	15	348181	18-2-1979	13-10-2006	23-4-2019	M.SC	PTC, CT, B.Ed	Tajori	GPS Qadar Walai	Maths/Ph
425	Dil Nawaz	15	348207	9-9-1979	13-10-2006	23-4-2019	M.SC	PTC, CT, B.Ed	Tajori	GPS Miru Mala Shagai	
426	Amir Khan	15	348053	14-2-1981	13-10-2006	23-4-2019	MA	PTC, CT, B.Ed	Mina Khel	GPS No.1 Isak Khel	
427	Sana Ullah Khan	15	348548	15-2-1981	13-10-2006	23-4-2019	MA, B.Sc	PTC, CT, B.Ed	Mash/Landiwa	GPS Wanda Balochan	
428	Muhammad Jamil	15	348197	15-2-1981	13-10-2006	23-4-2019	B.sc	PTC, CT, B.Ed	Mash/Landiwa	GPS Yaqoob Abad Landiwah	
429	Muhammad Zaman	15	348543	20-3-1981	13-10-2006	23-4-2019	M.SC	PTC, CT, B.Ed	Gandi	GPS Harna Tala	
430	Abdur Rashid Khan	15	348030	15-9-1981	13-10-2006	23-4-2019	MA	PTC, B.Ed	Mina Khel	GPS Wanda Fateh Khan Jat	
431	Pervaiz Kamal	15	348547	1-1-1982	13-10-2006	23-4-2019	MSC	PTC, CT, B.Ed	Gandi	GPS Nar Purdil Begu Khel	
432	Shafi Ullah	15	348436	2-3-1982	13-10-2006	23-4-2019	M.Sc	PTC-CT-B.Ed	Titter Khel	GPS Naqib Ullah Tabi Murad	
433	Qudrat Ullah Khan	15	348018	5-9-1982	13-10-2006	23-4-2019	MA	PTC-CT-B.Ed	Mash/Landiwa	GPS Maaz Ullah Landiwah	
434	Fanoos Khan	15	348462	12-10-1982	13-10-2006	23-4-2019	BA	PTC, B.Ed	Naurang	GPS Shakh Quli Khan	
435	Arif Ullah	15	348455	8-11-1982	13-10-2006	23-4-2019	B.SC	PTC	Tajori	GPS Gul mir Baqir Khel	
436	Hidayat Ullah	15	348212	2-2-1983	13-10-2006	23-4-2019	M.SC	PTC	Mash/Landiwa	GPS Gul Nawaz Faqir Landiwah	
437	Kiramet Ullah	15	348046	17-2-1983	13-10-2006	23-4-2019	M.Sc	PTC, CT, B.Ed	Tajazai	GPS Hassan Abad Ghazni Khel	
438	Sana Ullah	15	348020	18-10-1983	13-10-2006	23-4-2019	MA	PTC, CT, B. Ed	Mina Khel	GPS No.1 Ahmad Khel	
439	Muhammad Darvesh	15	348545	1-4-1984	13-10-2006	23-4-2019	BA	PTC	Naurang	GPS Sheikh Niazi	
440	Muhammad Zubair Khan	15	348124	8-5-1984	13-10-2006	23-4-2019	MA	PTC, CT, B. Ed	Gandi	GPS Kot Kashmir No.4	
441	Jamshed Khan	15	348544	3-11-1985	13-10-2006	23-4-2019	B.Sc	PTC, CT	Mina Khel	GPS No.2 Isak Khel	
442	Bismillah Jan	15	348546	2-4-1987	13-10-2006	23-4-2019	M.Sc	PTC	Tajori	GPS Kabal Sulaiman Khel	
443	Younas Khan	15	348056	14-7-1975	20-10-2006	23-4-2019	MA	PTC, CT, B. Ed	Mina Khel	GPS Dara Tang	
444	AKHTAR MUNIR	15	294455	10-3-1972	03-10-72	17-3-2021	BA	PTC	Titter Khel	GPS No.3 Chuhar Khel	
445	MUHAMMAD YASIN KHAN	15	387933	11-2-1977	11-02-77	17-3-2021	BA	PTC, CT	Tajori	GPS Amir Walai	
446	MIR SADA KHAN	15	293867	16-8-1964	25-06-85	17-3-2021	BA	PTC	Tajori	GPS Kotka Hayat Khan Sulaiman Khel	
447	MUHAMMAD AFSAR KHAN	15	178316	15-11-1970	06-10-88	17-3-2021	BA	PTC	Naurang	GPS kotka gnumal shas	
448	MUSTAFA KAMAL	15	294607	3-8-1968	14-10-88	17-3-2021	MA	PTC	Tajazai	GPS Wanda Kalan	
449	MUHAMMAD AYUB KHAN	15	294866	5-3-1966	18-10-88	17-3-2021	BA	PTC	Gandi	GPS Gul Mamin Wazir	
450	SYED AKBAR	15	294650	1-9-1966	19-10-88	17-3-2021	BA	PTC	Titter Khel	GPS Mati Ullah Pahar Khel Pacca	
451	HAMAT ULLAH KHAN	15	295584	22-2-1966	12-10-89	17-3-2021	BA	PTC	Tajori	GPS Landi Hakim Khan	
452	MUHAMMAD SALEEM	15	295114	1-9-1968	02-04-92	17-3-2021	BA	PTC	Mash/Landiwa	GPS Wanda Malu Khel	
453	ATLAS KHAN	15	295084	24-8-1970	21-12-92	17-3-2021	BA	PTC	Mash/Landiwa	GPS No.4 Wanda Shanab Khel	
454	MASHAL KHAN	15	293467	1-4-1972	11-04-93	17-3-2021	BA	PTC	Gandi	GPS Nar Raza Khan Adamzai	
455	HAMEED ULLAH	15	293608	1-1-1969	29-05-91	17-3-2021	BA	PTC	Titter Khel	GPS Nawaz Mala Khel	
456	TAHIR SHAH	15	296730	18-10-1968	15-1995	17-3-2021	MA	PTC-B.Ed	Titter Khel	GPS Sarwan Bahel Khel	
457	HABIB UR REHMAN	15	293307	14-11-1970	27-10-95	17-3-2021	BA	PTC	Gandi	GPS Kotka Dalal Khel	

Altered

## AUTHORITY

Mr. Kashif Munir Litigation Officer O/O the District Education Officer (Male) Lakki Marwat is hereby authorized to Submit Reply in Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar in S.A 1540/2023 Titled parvaiz Kamal Versus Government of Khyber Pakhtunkhwa on behalf of the undersigned.



District Education Officer (M)  
Lakki Marwat