

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
CAMP COURT D.I.KHAN

SERVICE APPEAL NO. 501/2015

Date of institution ... 11.05.2015
Date of judgment ... 26.11.2018

Mohammad Zaman S/o Aman Ullah R/O Village Magzai Tehsil & District Tank
Now Working as C.T Teacher in GMS Magzai, District Tank.
... (Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar.
2. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar.
3. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
4. District Education Officer (Male), Tehsil & District Tank.
5. District Accounts Officer, Tehsil & District Tank.
6. Azad Khan S/O Badshah Khan Now serving as SCT Teacher at GHS Gul Imam Tehsil and District Tank and 14 other private respondents.
... (Respondents)

M. Amin
26.11.2018

SERVICE APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 TO THE EFFECT THAT THE COMBINED SENIORITY LIST PREPARED BY RESPONDENT NO. 3 IS TOTALLY WRONG, ILLEGAL, UNLAWFUL AND THAT THE APPELLANT HAS BEEN PLACED AT SERIAL NO. 105 OF THE COMBINED MERIT LIST (MALE), WHICH IS TOTALLY WRONG AND AGAINST THE RULES AND PROCEDURE AND RESPONDENTS HAVE BEEN ILLEGALLY PLACED SENIOR TO THE APPELLANT IN THE COMBINED SENIORITY LIST DATED 17.12.2012. SIMILARLY, THE PROMOTION/UP-GRADATION OF THE RESPONDENTS VIDE IMPUGNED OFFICE ORDER NO. 10197-10202/DEO (M) DATED 25.11.2014 IS TOTALLY ILLEGAL, UNLAWFUL, VOID AB-INITIO AND AGAINST THE RULES. AND THE APPELLANT IS ACTUALLY BE ENTITLED TO BE PROMOTED/UPGRADED FROM CT BPS-15 TO SCT BPS-16 ON THE BASIS OF NOTIFICATION NO. 10197-10202/DEO (M) DATED 25.11.2014 AND NOTIFICATION NO. FINANCE DEPARTMENT ENDORSEMENT NO. SO(FR)FD/10-22(E)/2010 DATED 16.07.2012.

Mr. MUHAMMAD AMIN KHAN KUNDI
MR. AHMAD HASSAN

.. MEMBER (JUDICIAL)
.. MEMBER (EXECUTIVE)

JUDGMENT

MUHAMMAD AMIN KHAN KUNDI, MEMBER: -

Counsel

for the appellant present. Mr. Usman Ghani, District Attorney assisted by learned counsel for private respondents alongwith Mr. Mehmood Azam, ADO for the respondents present. Arguments heard and record perused.

2. Brief facts of the case as per present service appeal are that the appellant was serving as Certified Teacher in Education Department FR Tank. He was transferred from Government Middle School Sobati Kach, FR Tank to Government Middle School Maghzai District Tank against the vacant post of Certified Teacher vide order dated 28.11.2001 with the condition that the seniority of the appellant be determined at the bottom of the seniority list. Combined seniority list of Certified Teachers District Tank was prepared/issued by the respondent-department on the basis of seniority list, the private respondents serving as Certified Teachers BPS-15 were upgraded to Senior Certified Teacher BPS-16 on the basis of existing policy of the Provincial Government vide order dated 25.11.2014. The appellant filed departmental appeal against the combined seniority list dated 17.12.2012 of District Tank before the District Education Officer Male as well as Secretary Education Khyber Pakhtunkhwa Peshawar on 20.11.2014 and 03.12.2014 respectively, the same were not decided hence, the present service appeal on 11.05.2015.

3. Respondents were summoned who contested the appeal by filling of written reply/comments.

4. Learned counsel for the appellant contended that the length of service of the appellant as Certified Teacher was more than the private respondents but the respondent-departments have wrongly placed the name of the private respondents as senior than the appellant therefore, the seniority list of Certified Teachers of District Tank pertaining to the year 2012 is illegal and liable to be rectified. It was further contended by the learned counsel for the appellant that

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the official respondents have also upgraded the private respondents from BPS-15 to BPS-16 vide order dated 25.11.2014 and the appellant was wrongly deprived from the said up-gradation on the basis of seniority list therefore, prayed that the seniority list pertaining to the year 2012 be rectified and the respondent-department be also directed to upgrade the appellant.


5. On the other hand, learned District Attorney for the official respondents as well as learned counsel for private respondents opposed the contention of learned counsel for the appellant and contended that the appellant was serving in Education Department in FR Tank as Certified Teacher but he was transferred from FR Tank to settle area District Tank vide order dated 28.11.2001 with the condition that the seniority be determined at the bottom of the seniority list of District Tank. It was further contended that it is also a well settled rule/law that when any civil servant is transferred from FR to District or one district to another district than the name of the civil servant is placed at the bottom of the seniority list of that department. It was further contended that since the appellant was transferred from FR Tank to District Tank therefore, the name of the appellant was rightly placed junior to the private respondents at the relevant time and the private respondents were rightly upgraded by the official respondents on the basis of said seniority list. It was further contended that the appellant has also been upgraded from BPS-15 to BPS-16 vide order dated 04.08.2017 therefore, the ^{appellant} ~~appellant~~ to the extent of up-gradation become infructuous and prayed for dismissal of appeal.

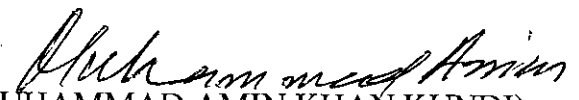
6. Perusal of the record reveals that the appellant was serving in Education Department as Certified Teacher in FR Tank. He was transferred from FR Tank to District Tank vide order dated 28.11.2001 with the condition that the seniority of the appellant be determined at the bottom of the seniority list of District Tank. Moreover, it is also a well settled rules/law that when any civil servant is transferred from FR to settle area or one District to another District

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than the name of that civil servant in the seniority list is placed at the bottom of seniority list therefore, the name of the appellant was rightly placed junior to the private respondents in the seniority list. It is also pertinent to mention here that the appellant was transferred from FR Tank to District Tank vide order dated 28.11.2001. The seniority list is prepared/issued every year but the appellant has challenged the seniority list only pertaining to the year 2012 and has not challenged the seniority list issued/prepared before year 2012, meaning thereby that the earlier seniority list issued before 2012 attained finality. The appellant was also not able to show that he was senior to private respondents in the seniority list issued before 2012. Moreover, the appellant is at serial No. 105 of seniority list pertaining to year 2012, if his appeal is accepted, his other colleagues will be affected who have not been made party by the appellant in the appeal. Furthermore, the appellant has been upgraded from BPS-15 to BPS-16 vide notification dated 04.08.2017 therefore, the appeal to the extent of up-gradation become infructuous. The departmental appeal is also time barred. As such, the present service appeal has no force which is hereby dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
26.11.2018


(AHMAD HASSAN)
MEMBER
CAMP COURT D.I.KHAN


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER
CAMP COURT D.I.KHAN

Service Appeal No. 501/2015

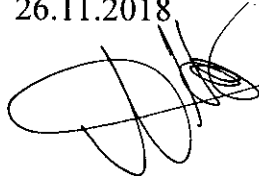
12.09.2018 12th September has been declared as public holiday on account of 1st Muharram therefore, the case is adjourned for the same on 26.11.2018 before D.B at Camp Court D.I.Khan.

Reader


26.11.2018 Counsel for the appellant present. Mr. Usman Ghani, District Attorney assisted by the learned counsel for private respondents alongwith Mr. Mehmood Azam, ADO for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today consisting of four pages placed on file, the appeal to the extent of up-gradation become infructuous. The departmental appeal is also time barred. As such, the present service appeal has no force which is hereby dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
26.11.2018




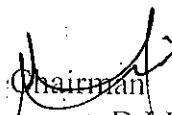
(AHMAD HASSAN)
MEMBER
CAMP COURT D.I.KHAN


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER
CAMP COURT D.I.KHAN

14.03.2018


Appellant alongwith Damsas Khan Gandapur Advocate present and submitted fresh wakalatnama. Mr. Ziaullah, DDA alongwith Mehmoood Azam, ADO for the respondents present. Counsel for the appellant requested for adjournment. To come up for arguments on 23.4.2018 before the D.B at camp court, D.I.Khan.


Member


Chairman
Camp/court, D.I.Khan

25.05.2018

Due to retirement of the worthy Chairman, the Tribunal is non-functional. To come up for the same on 20.06.2018. Notices be issued to the parties accordingly.


Member

20.06.2018

Appellant is not in attendance however his counsel Mr. Damsas Khan Advocate put appearance. Mr. Usman Ghani, learned District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment of the case to next tour. Granted but as a last chance. To come up for arguments on 27.08.2018 before the D.B. at camp court D.I.Khan.


Member


Chairman
Camp Court, D.I.Khan

27.08.2018

counsel for the appellant present. Mr. Mahmood Azam, ADO on behalf of the respondents present. Tour is hereby cancelled, Therefore the case is adjourned for the same on 12-09-2018 at camp court D.I. Khan.

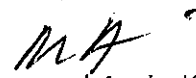


22.01.2018

Appellant in person present. Mr. Farhaj Sikandar, District Attorney alongwith Mr. Mehmood Azam, ADO for official respondents No. 1 to 5 also present. Appellant requested for adjournment on the ground that his counsel is not available today. Adjourned. To come up for arguments on 19.02.2018 before D.B at Camp Court D.I.Khan.



(Ahmad Hassan)
Member
Camp Court D.I.Khan



(Muhammad Amin Khan Kundi)
Member
Camp Court D.I.Khan

19.02.2018

Appellant in person present. Mr. Usman Ghani, District Attorney alongwith Mr. Mehmood Azam, ADO for official respondents No. 1 to 5 and counsel for private respondents also present. Appellant requested for adjournment on the ground that his counsel is not available today. Adjourned. To come up for arguments on 14.03.2018 before D.B at Camp Court D.I.Khan.



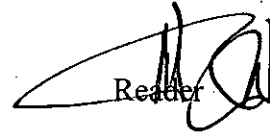
(Ahmad Hassan)
Member
Camp Court D.I.Khan



(Muhammad Amin Khan Kundi)
Member
Camp Court D.I.Khan


28.03.2017

Since tour is hereby cancelled, therefore, the case is adjourned for the same on 26.07.2017.


Reader

26.07.2017

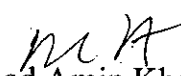
None present on behalf of the appellant. Mr. Farhaj Sikandar, District Attorney for the official respondents also present. Notice be issued to appellant and his counsel for attendance for 27.11.2017 before S.B at Camp Court D.I.Khan.


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I. Khan

27.11.2017

None present on behalf of the appellant. Mr. Farhaj Sikandar, District Attorney alongwith Mr. Mehmood Azam, ADO (litigation) for official respondents No. 1 to 5 present. Again notice be issued to appellant and his counsel for attendance for 22.01.2018 before D.B at Camp Court D.I.Khan.


(Gul Zeb Khan)
Member


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I. Khan

23.2.2016

Clerk of counsel for the appellant, Mr. Farhaj Sikandar, GP for official respondents and counsel for private respondents No. 6 to 8, 11 to 14 and 16 to 28 present and written replies filed. Copies handed over to clerk of counsel for the appellant. None is available on behalf of other respondents, hence placed ex-parte. To come up for rejoinder on 24-5-16 at Camp Court D.I.Khan.



MEMBER
Camp Court, D.I.Khan

24.05.2016

Clerk to counsel for the appellant and Mr. Saleem Khan, ADO alongwith Mr. Farkhaj Sikandar, GP for respondents present. Clerk to counsel for the appellant requested for time to file rejoinder. To come up for rejoinder on 25.10.2016 at camp court D.I. Khan.



Member
Camp Court D.I.Khan

25.10.2016

Appellant in person and Mr. Muhammad Farooq, SST alongwith Mr. Farhaj Sikandar, Government Pleader for the respondents present. Rejoinder not submitted. Appellant requested for further time for filing of rejoinder. Request accepted. To come up for rejoinder on 28.03.2017 before S.B at Camp Court D.I.Khan.



Member
Camp Court D.I.Khan

12.06.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was initially appointed as CT in FR Tank and his service were subsequently transferred to District Tank. That the services rendered by the appellant in FR Tank were not considered by the respondents at the time of granting up-gradation to similarly placed CT Teachers and therefore the appellant was deprived of the benefits of up-gradation vide order dated 25.11.2014 whereafter he preferred departmental appeal on 8.1.2015 which was not responded and hence the instant service appeal on 27.5.2015.

That the appellant is entitled to the benefits of up-gradation from BPS-15 to BPS-16 by including the services rendered by the appellant at FR Tank.

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 for 22.9.2015 before S.B.


Chairman

22.09.2015

Counsel for the appellant present. Addl: A.G for official respondents present. Private respondents not served. The appeal pertains to the territorial limits of D.I.Khan Division as such the same is assigned to D.I.Khan Bench. Fresh notices be issued to private respondents for 26.10.2015 before S.B at Camp Court D.I.Khan.


Chairman

26.10.2015

Clerk of counsel for the appellant and Mr. Farhaj Sikandar, GP for the official respondents and private respondent No. 16 in person present. They requested for time. None is available on behalf of the other private respondents. Fresh notices be issued to them. Case to come up for written reply positively at camp court, D.I.Khan on 29.12.15.


MEMBER
Camp court, D.I.Khan




Appellant Deposited
Security & Process Fee



Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 501/2015


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	27.05.2015	<p>The appeal of Mr. Muhammad Zaman resubmitted today by Mr. Sadiq Ali Mohmand Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	27-5-15	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>29-5-15</u></p> <p style="text-align: right;"> CHAIRMAN</p>
3	29.05.2015	<p>None present for appellant. Notice to counsel for the appellant be issued for preliminary hearing for 12.6.2015 before S.B.</p> <p style="text-align: right;"> Chairman</p>

The joint appeal of Mr. Muhammad Zaman son of Amanullah CT Teacher GMS Magzai Distt. Tank received to-day i.e. on 11.05.2015 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Copy of departmental appeal against the order dated 25.11.2014 is not attached with the appeal which may be placed on it.
- 3- Copy of merit list mentioned in para-5 of the memo of appeal (Annexure-D/I) is not attached with the appeal which may be placed on it.
- 4- Annexures-B and C of the appeal are illegible which may be replaced by legible/better one.
- 5- Annexures of the appeal may be attested.
- 6- Twenty two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 700 /S.T,

Dt. 12/5 /2015


REGISTRAR — 12/5/15
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Sadiq Ali Mohmand Adv. Pesh.

Dr.

Resubmitted

*+ copies are available at
page 26, 27 & 24, 25*

*+ All necessary objects
has been completed
well.*

One

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BEFORE THE SERVICE TRIBUNAL, KPK, PESHAWAR

Service Appeal No. 501 of 2015

Mohammad Zaman **VERSUS** Govt. of KPK and others

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Grounds of Service Appeal <i>AND AFFIDAVIT</i>		1-8
2.	Addresses of Parties & <i>APPLICATION for Condonation of delay</i>		9-12
3.	Appointment order	A	13-14
4.	Transfer order copy	B	15-16
5.	Notification of E & S Education	C	16
6.	Combined Seniority list	D	17-23
7.	Promotion/upgradation notification	D1	24-25
8.	Departmental Representation	E, E1	26-27
9.	Wakalatnama		28-29

Through

Appellant

Sadiq Ali Mohmand
Sadiq Ali Mohmand
Advocate High Court,
Peshawar

Date: 09/5/2015

(2)

BEFORE THE SERVICE TRIBUNAL, KPK, PESHAWAR

K.W.F. Province
Service Tribunal
Diary No. 498
Dated 11-5-2015

Service Appeal No. 501 of 2015

Mohammad zaman s/o Aman ullah R/O village magzai tehsil & Distt Tank now working as C.T Teacher in GMS Magzai, tehsil & Distt Tank.....Appellant

Versus

1. Govt. of KPK through Chief Secretary,
Civil Secretariat, Peshawar
2. Govt. of KPK through Secretary Elementary & Secondary Education,
Peshawar
3. Director Elementary & Secondary Education, KPK, Peshawar
4. District Education Officer (Male), Tehsil & District Tank
5. District Accounts Officer, Tehsil & District Tank
6. Azad khan s/o Badshah khan now serving as SCT Teacher at GHS Gul imam
Tehsil & Distt Tank
7. Abu Suleman s/o Haji Abdul khaliq now serving as SCT Teacher at GHS Kot
Khadak, Tehsil & Distt Tank
8. Shafqat ullah s/o Aman ullah khan now serving as SCT Teacher at GMS
Magzai Tehsil & Distt Tank
9. Zahir shah s/o Abdul aziz now as SCT Teacher as SCT Teacher at GMS M.
Akbar Tehsil & Distt Tank
10. Mohmmad Riaz s/o Obed ullah jan now serving as SCT Teacher at GHS Pai,
Tehsil & Distt Tank
11. Aziz ullah s/o Aman ullah now serving as SCT Teacher at GCMHS No.1.Tank
12. Syed zahoor shah s/o Syed haq nawaz shah now serving as SCT Teacher at
GHS Gara balouch Tehsil & Distt Tank
13. Ilahi Bakhsh s/o Khuda bakhsh now serving as SCT Teacher at GCMHS No.1
Tank, Tehsil & Distt Tank

11/5/15

27/5/15

14. Saif ullah jan s/o Younas jan now serving as SCT Teacher at GHS daraki Tehsil & Distt Tank
 15. Muhammad Ayub s/o Gul rang now serving as SCT Teacher at GHS No.3 Tank, Tehsil & Distt Tank
 16. Akbar ali s/o Noor kamal now serving as SCT Teacher at GHS Kaka khel, Tehsil & Distt Tank
 17. Ali gohar s/o umar khan now serving as SCT Teacher at GHS Umar khel, Tehsil & Distt Tank
 18. Sana ullah s/o Atta ullah now serving as SCT Teacher at GCMHS No.1 Tank
 19. Muhammad Hashim s/o Mosam khan now serving as SCT Teacher at GHS Gomal bazaar, Tehsil & Distt Tank
 20. Muhammad Rafiq s/o Ahmad saeed now serving as SCT Teacher at GHS Sheikh uttar, Tehsil & Distt Tank
-Respondents

Service Appeal u/s 4 of the Service Tribunal Act, 1974 KPK to the effect that the combined seniority list prepared by respondent NO.3 is totally wrong, illegal, unlawful and that the appellant has been placed at Serial No.105 of the Combined Merit List (Male), which is totally wrong and against the rules And procedure and respondents have been illegally placed senior to the appellant in the Combined Seniority List dated 17.12.2012. Similarly, the promotion/upgradation of the respondents vide impugned office order No.10197-10202/DEO(M) dated 25.11.2014 is totally illegally ,unlawful, void ab-initio and against the rules, and the appellant is actually be entitled to be promoted / upgraded from CT BPS-15 to SCT BPS-16 on the basis of Notification No. No.10197-10202/DEO(M) dated 25.11.2014 and notification No Finance Department Endorsement No. SO(FR)/FD/10-22(E)/2010 DATED 16.07.2012.

Respectfully Sheweth:

1. That initially the appellant was appointed as a C.T teacher (BPS-15) in Govt. High School khirgi, F.R Tank on 01.02.1990.
(cope of appointment order is annexed as 'A')

2. That on 28.11.2001, the appellant was transferred from Govt. High School F.R Tank to Govt. High School Magzai, District Tank through the office order issued by the Directorate of Secondary & Elementary Education NWFP, Peshawar.
(copy of transfer order is annexed as 'B')
3. That on 11.07.2012, the Govt of KPK Elementary & Elementary Education issued Notification No. SO (B & A)/1-18/E&SE/2012 and upgraded the post of CT BPS-15 to SCT BPS-16 on the basis of seniority-cum-Extra Educational qualification and teaching experience etc and the same was approved by the Finance Department, Govt of KPK. (Copy of Notification is Annexure "C").
4. That on 17.12.2012, respondent NO.3 issued combined seniority list in which the appellant was placed at Serial No.105, which is totally wrong, frivolous, actually the appellant is senior to the respondents in service and teaching experience. (Copy of Combined Seniority List is Annexure "D").
5. That in pursuance of the above said notification, issued by the Govt of KPK, the respondent No.3 issued the upgradation/ promotion vide office Notification No.10197-10202/DEO(M) dated 25.11.2014 of the respondents according to the impugned seniority list and left behind the appellant without extending any benefit of Govt Notification No.SO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 DATED 16.07.2012. (Copy of Final Merit list is Annexure "D/1").
6. That on 20/11/2014 & 8/1/2015, the appellant preferred departmental representation to respondent No.3 and respondent No.2 for their grievances but to no avail. (Copy of departmental representation is Annexure "E").
7. That being aggrieved of the said impugned seniority list and office notification No.10197-10202 dated: 25/11/2014 of the respondent No.3, the appellant

approached this Honourable Tribunal, on the following grounds amongst others:

GROUNDS:

- A. That the impugned seniority list issued by respondent No.3 is totally misconceived, frivolous, wrongful, illegal, against law and rules and the subsequent order dated 25.11.2014 thereon, is also illegal, unlawful and void ab-initio.
- B. That respondent No.3 has wrongly prepared the impugned seniority list and the benefit of the same has wrongly been extended to the private respondents.
- C. That the length of service date of original appointment of the appellant has not been considered while preparing the impugned seniority list, thus the respondents has fell in an error and has deviated from the settled rules and law enumerated under the Act.
- D. That considering the length of service and date of appointment of the appellant, the appellant comes senior to the private respondents and is entitled for the benefits of upgradation/ promotion from CT BPS-15 to SCT BPS-16 according to the criteria fixed by the government in the above said Notification.
- E. That the whole exercise conducted by the respondents from A to Z is totally wrong, illegal, unlawful and against the law and the appellant has wrongly been deprived from his promotion/ upgradation.
- F. That the impugned seniority list and Notification 10197-10202 dated; 25/11/2014, is manifestly illegal, unlawful, without lawful authority as well as smacks malafide on the part of authority, therefore, liable to be set aside.


G. That any other ground may be taken at the time of arguments, with the kind permission of this Honourable Court.

It is, therefore, most humbly prayed that on acceptance of this service appeal, the combined seniority list prepared by respondent NO.3 is totally wrong, illegal, unlawful and that the appellant has been placed at Serial No.105 of the Combined Merit List (Male), which is totally wrong and against the rules And procedure and respondents have been illegally placed senior to the appellant in the Combined Seniority List dated 17.12.2012. Similarly, the promotion/upgradation of the respondents vide impugned office order No.10197-10202/DEO(M) dated 25.11.2014 is totally illegally ,unlawful, void ab-initio and against the rules, and the appellant is actually be entitled to be promoted / upgraded from CT BPS-15 to SCT BPS-16 on the basis of Notification No. No.10197-10202/DEO(M) dated 25.11.2014 and notification No Finance Department Endorsement No. SO(FR)/FD/10-22(E)/2010 DATED 16.07.2012.

Through

Date: __/__/2015


Appellant


Sadiq Ali Mohmand
Advocate High Court
Peshawar

BEFORE THE SERVICE TRIBUNAL, KPK, PESHAWAR

Service Appeal No. _____ of 2015

Mohammad zaman s/o Aman ullah R/O village magzai tehsil & Distt Tank now working as C.T Teacher in GHS Magzai, tehsil & Distt Tank.....**Appellant**

Versus

1. Govt. of KPK through Chief Secretary,
Civil Secretariat, Peshawar
2. Govt. of KPK through Secretary Elementary & Secondary Education,
Peshawar
3. Director Elementary & Secondary Education, KPK, Peshawar
4. District Education Officer (Male), Tehsil & District Tank
5. District Accounts Officer, Tehsil & District Tank
6. Azad khan s/o Badshah khan now serving as SCT Teacher at GHS Gul imam
Tehsil & Distt Tank
7. Abu Suleman s/o Haji Abdul khaliq now serving as SCT Teacher at GHS Kot
Khadak, Tehsil & Distt Tank
8. Shafqat ullah s/o Aman ullah khan now serving as SCT Teacher at GMS
Magzai Tehsil & Distt Tank
9. Zahir shah s/o Abdul aziz now as SCT Teacher as SCT Teacher at GMS M.
Akbar Tehsil & Distt Tank
10. Mohmmad Riaz s/o Obed ullah jan now serving as SCT Teacher at GHS Pai,
Tehsil & Distt Tank
11. Aziz ullah s/o Aman ullah now serving as SCT Teacher at GCMHS No.1.Tank
12. Syed zahoor shah s/o Syed haq nawaz shah now serving as SCT Teacher at
GHS Gara balouch Tehsil & Distt Tank
13. Ilahi Bakhsh s/o Khuda bakhsh now serving as SCT Teacher at GCMHS No.1
Tank, Tehsil & Distt Tank
14. Saif ullah jan s/o Younas jan now serving as SCT Teacher at GHS daraki
Tehsil & Distt Tank

- 15. Muhammad Ayub s/o Gul rang now serving as SCT Teacher at GHS No.3 Tank, Tehsil & Distt Tank
 - 16. Akbar ali s/o Noor kamal now serving as SCT Teacher at GHS Kaka khel, Tehsil & Distt Tank
 - 17. Ali gohar s/o umar khan now serving as SCT Teacher at GHS Umar khel, Tehsil & Distt Tank
 - 18. Sana ullah s/o Atta ullah now serving as SCT Teacher at GCMHS No.1 Tank
 - 19. Muhammad Hashim s/o Mosam khan now serving as SCT Teacher at GHS Gomal bazaar, Tehsil & Distt Tank
 - 20. Muhammad Rafiq s/o Ahmad saeed now serving as SCT Teacher at GHS Sheikh uttar, Tehsil & Distt Tank
-Respondents


AFFIDAVIT

I, Mohammad zaman s/o Aman ullah R/O village Magzai tehsil & District Tank do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.


DEPONENT

ID # 12201-1902149-3

ATTESTED
Alhaj M. Tajdar Khan
ADVOCATE
NOTARY PUBLIC
Distt: Court Peshawar


9/5/15

ADDRESSES OF PARTIES**APPELLANT:**

Mohammad zaman S/o Aman ullah
 R/o Village Magzai Tehsil & Distt Tank
 Now serving as C.T Teacher at GHS, Magzai, Distt Tank

RESPONDENTS:

1. Govt. of KPK through Chief Secretary,
Civil Secretariat, Peshawar
2. Govt. of KPK through Secretary Elementary & Secondary Education,
Peshawar
3. Director Elementary & Secondary Education, KPK, Peshawar
4. District Education Officer (Male), District Tank
5. District Accounts Officer, District Tank
6. Azad khan s/o Badshah khan now serving as SCT Teacher at GHS Gul imam
Tehsil and Distt Tank
7. Abu Suleman s/o Haji Abdul khaliq now serving as SCT Teacher at GHS Kot
Khadak, Tehsil and Distt Tank
8. Shafqat ullah s/o Aman ullah khan now serving as SCT Teacher at GMS
Magzai Tehsil & Distt Tank
9. Zahir shah s/o Abdul aziz now as SCT Teacher as SCT Teacher at GMS M.
Akbar Tehsil & Distt Tank
10. Mohmmad Riaz s/o Obed ullah jan now serving as SCT Teacher at GHS Pai,
Tehsil & Distt Tank
11. Aziz ullah s/o Aman ullah now serving as SCT Teacher at GCMHS No.1 Tank
12. Syed zahoor shah s/o Syed haq nawaz shah now serving as SCT Teacher at
GHS Gara balouch Tehsil & Distt Tank
13. Ilahi Bakhsh s/o Khuda bakhsh now serving as SCT Teacher at GCMHS No.1
Tank, Tehsil & Distt Tank
14. Saif ullah jan s/o Younas jan now serving as SCT Teacher at GHS daraki
Tehsil & Distt Tank

15. Muhammad Ayub s/o Gul rang now serving as SCT Teacher at GHS No.3 Tank, Tehsil & Distt Tank
16. Akbar ali s/o Noor kamal now serving as SCT Teacher at GHS Kaka khel, Tehsil & Distt Tank
17. Ali gohar s/o umar khan now serving as SCT Teacher at GHS Umar khel, Tehsil & Distt Tank
18. Sana ullah s/o Atta ullah now serving as SCT Teacher at GCMHS No.1 Tank
19. Muhammad Hashim s/o Mosam khan now serving as SCT Teacher at GHS Gomal bazaar, Tehsil & Distt Tank
20. Muhammad Rafiq s/o Ahmad saeed now serving as SCT Teacher at GHS Sheikh uttar, Tehsil & Distt Tank



Appellant

Through

Sadia Ali Mohmand
Advocate High Court,
Peshawar



BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR

Service Appeal No. _____ of 2015

Muhammad Zaman.....Applicant/ Appellant

V E R S U S

Govt of KPK thr: Chief Secretary & others.....Respondents

APPLICATION FOR CONDONATION OF DELAY

Respectfully Sheweth:

1. That the captioned service appeal petition is being filed before this Honourable Court, in which no date of hearing has yet been fixed
2. That the applicant's last date of submitting of service appeal was 08.05.2015 in the Honourable Tribunal.
3. That the applicant hailing from far flung area of District Tank and it takes 5/6 hours to reaching Peshawar.
4. That on the last date, the applicant started his journey through public vehicle from District Tank to Peshawar to submit his appeal in this Honourable Tribunal.
5. That when the applicant reached near District Karak, some serious mechanical problems occurred to the vehicle engine.



- 6. That it was an utter shock to the applicant when he came to know that the vehicle will restart journey after proper examination by the Mechanic.
- 7. That despite the dire efforts made by the applicants, he could not reach to Peshawar in time as it was Friday too on 08.05.2015 i.e. last working day of the Service Tribunal.
- 8. That on next day i.e. Saturday and Sunday 09.05.2015 and 10.05.2015 respectively, the Tribunal was non-functional for their weekly holidays.
- 9. That delay in filing the titled service appeal is neither willful nor deliberate but due to reason mentioned above.

It is, therefore, most humbly prayed that on acceptance of this application, the delay, if any, in filing the above titled service appeal petition may kindly be condoned in the interest of justice.

Applicant/ Appellant

Through

Sadiq Ali Mohmand
Advocate, Peshawar

Date: 11 / 05 / 2015

AFFIDAVIT

I, Muhammad Zaman (applicant/ appellant), do hereby solemnly affirm and declare on oath that the contents of the Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

DEPONENT



ID # 12201-1902/49-3

11/5/2015

OFFICE OF THE DIRECTOR STATE OF EDUCATION, PATA.N.W.F.P. PESHAWAR.
APPOINTMENT/ADJUSTMENTS/

Consequent upon the approval of the department selection Committee, the following Candidates are hereby appointed/adjusted against temporarily @ Rs.820/-P.M. fixed each in BPS-9 or on their own pay and BPS in case of those who already in services in teaching cadre (which ever is beneficial) plus usual allowances as admissible under the rules with effect from the dates of their taking over charge in the Schools noted against their names.

S.NO.	NAME/FATHER'S NAME.	POSTED AT.	REMARKS.
<u>BAJOUR AGENCY.</u>			
1.	Mahmood Din S/O Abdul Ghani, M.A. Arabic.	GHS.Zorbandar.	C.T./S.V. vacant post.
<u>MOLWAND AGENCY</u>			
1.	Shekh Zada, S/O Gul Jan, B.Sc.	GMS.Nawakelay.	-do-
2.	Mujib Ali S/O Ibadat Iher, B.A. B.Ed.	-do-	-do-
<u>KHIBER AGENCY.</u>			
1.	Nawab Gul S/O Ashna Gul B.Sc.	GHS.Kem Shalman.	-do-
2.	Salimullah S/O Azad Khan, B.A.	GHS.Kamar Khel Attary.	-do-
3.	Isqat Ali S/O Arsale Khan, B.A.	GHS.Jankhan Killi.	-do-
4.	Inayat Khan S/O Amin Jan, B.A.B.Ed.	GHS.Loi Shalman..	-do-
5.	Ikramullah S/O Karim Cui, F.A.	GMS.Zawa.	-do-
6.	Mohammed Younus Afridi S/O Aminullah, F.A.	GMS.Jabba.	-do-
7.	Mohammad Anwer S/O Sherahat, Afridi, F.A.	GMS.Cheora.	-do-
8.	Ghaffar Khan, S/O Mastan Khan, F.A.	GHS.Jan Khan Killi	-do-
9.	Sabir Hussain S/O Gharib Hussain, F.A.	GHS Kohi Sher Haider ..	-do-
10.	Sardar Khan S/O Zaid Khan, F.Sc.	GMS Spin Qator.	-do-
11.	Munawar Khan S/O Akbar Khan, F.A.	GMS Kharghalai.	-do-
<u>F.P.PESHAWAR.</u>			
1.	Ikramullah S/O Hoshad Khan, B.Sc.	GMS.Akbar Killi.	-do-
2.	Tasleem Khan, S/O Mural Khan, B.Sc.	GHS.Jan Khan Killi;	-do-
3.	Jahanzeb Khan S/O Latbez Khan, B.A.	GHS.Faridi.	-do-
4.	Mohammad Shaid S/O Soltet Khan, F.A.	GHS.Faridi.	-do-

F.R. KHMIT.

- | | | |
|---|--------------------------|--------------------|
| 1. Amanullah Khan S/O Ghulam Iqbal,
PTC, G.P.S. Bazi Thel. (C.T.) B.A. | G.S. Sharaki. | C.S./S.V.
post. |
| 2. Munsif Khan S/O Akram Khan,
B.A.C.T. | G.S. Toor Chappa. | -do- |
| 3. Ashraf Noor S/O Gul Habib,
B.A.C.T. | G.S. Paya. | -do- |
| 4. Noor Aslam S/O Mir Aslam, B.A. | G.S. Jammu. | -do- |
| 5. Kamil Khan S/O Mir Ghulam, B.A. | G.S. Toorki Ismail Khel. | -do- |
| 6. Nazir Hussain S/O Ghulam Jan, F.A. | G.S. Ara Khel. | -do- |

OLAKHIA AGENCY.

- | | | |
|--|--------------------|------|
| 1. Mirza Hassan, S/O Faqir Hassan,
M.Sc Hon:agri: | G.S. Pooti Bagh. | -do- |
| 2. Shamsur Rehman S/O Hafiz Atal
Hafiz, F.Sc. | G.S. Inzar Pattai. | -do- |
| 3. Syed Saghir Syed S/O Syed Zamin
Jan, F.A. | G.S. Sarobe Ghari. | -do- |
| 4. Fazal Tariq S/O Fazal Khelk, B.A. | G.S. Safal Dara. | -do- |

KURRAM AGENCY.

- | | | |
|---|------------------------|------|
| 1. Nasir Ali S/O Mansur Ali, B.A. | G.S. Sakhi Ahmad Shah, | -do- |
| 2. Manjan Ali S/O Nawab Ali, B.Sc. | G.S. Baggum. | -do- |
| 3. Noor Ali Shah S/O Ali Hesser Sheh.
B.Sc. | Ex-SG G.S. Dogar. | -do- |
| 4. Shujat Ullah S/O Malik Annullah,
B.Sc. | G.S. Bily Amin. | -do- |
| 5. Sabir Hussein S/O Dost Mohammad,
B.A. | G.S. Shah Ibrahim, | -do- |
| 6. Syed Ahmad Raza S/O Mohd Iqbal Raza,
B.A. | G.S. Mirjamaal. | -do- |
| 7. Syed Riaz Hussain S/O Syed
Mir Hassan J n B.Sc. | G.S. Amalkot. | -do- |
| 8. Maqbool Hussain S/O Luchman Ali,
D.M. B.A. (C.T. Tria) | G.S. Alamshar. | -do- |
| 9. S. Anayat Hussain S/O S. Akbar Jan.
B.A. | G.S. Ahmedzai. | -do- |
| 10. Subhan Ali S/O Sultan, B.A. C.T. | G.S. Luqman Khel. | -do- |
| 11. Jabir Hussain S/O H. Ali Sana | G.S. Daradar. | -do- |
| 12. Jabir Ali S/O Ali Nabi, B.A. | G.S. Tindo. | -do- |
| 13. Shah Zed Gul S/O Gul Ali, B.A. C.T. | G.S. Badama. | -do- |
| 14. Sulfiqar Ali S/O Mir Ali, B.Sc. | G.S. Uchat. | -do- |
| 15. Saif Amin Hussain S/O S. Heidar
Hussain, B.A. C.T. Cont: | G.S. Z Alizai. | -do- |

F.R. BANNU.

- | | | |
|---|-----------------|------|
| 1. Mohamad Shafiq Khan S/O Saifur
Rehman B.A. P.T.C. | G.S. Watin. | -do- |
| 2. Mir Fayyaz S/O Hayatullah, P.T.C. | G.S. Wali noor. | -do- |

OFFICE OF THE DIRECTORATE OF EDUCATION, FATA N.W.F.P PESHAWAR APPOINTMENT/ADJUSTMENTS

Consequent upon the approval of the department selection Committee, the following Candidates are hereby appointed/adjusted again temporarily @ Rs. 830/- P.M fixed paid each in BPS-9 or on their own pay and BPS in case of those who already in services in teaching cadre (which ever is beneficial) plus usual allowance as admissible under the rules with effect from the dates of their taking over charge in the Schools noted against their names.

S. No	Name/Father Name Bajour Agency	Posted at	Remarks
1	Mahmood Din S/o Abdul Ghani, M.A, Arabic	GHS. Zorbandar	C.T/S.V Vacant Post

MOHMAND AGENCY

1	Sheikh Zada S/o Gul Jan B.Sc	GMS Nawakaley	-do-
2	Mujib Ali S/o Ibadat Khan B.A, B.Ed	-do-	-do-

KHYBER AGENCY

1	Nawab Gul S/o Ashna Gul B.Sc	GHS. Kam Shalman	-do-
2	Salim Ullah S/o Azad Khan B.A	GHS. Kamar Kheil Attary	-do-
3	Liaqat Ali S/o Arsals Khan B.A	GHS. Jankhan Killi	-do-
4	Inayat Khan S/o Amin Jan B.A, B.ED	GHS. Loi Shalman	-do-
5	Ikram ullah S/o Karim Gul F.A	GMS. Zawa	-do-
6	M. Younus Afridi S/o Amin Ullah F.A	GMS. Jabba	-do-
7	M. Anwar S/o Sheraital Afridi F.A	GMS. Choorra	-do-
8	Ghaffar Khan S/o Musharaf Khan F.A	GHS. Khan Killi	-do-
9	Sabir Hussain S/o Sardar Hussain F.A	GHS Kohi Sher Haider	-do-
10	Sardar Khan S/o Zarbad Khan F.Sc	GMS Spin Qabar	-do-
11	Munawar Khan S/o Akmal Khan F.A	GMS Kharghalai	-do-

F.R PESHAWAR

1	Ikram Ullah S/o Mashod Khan B.Sc	GMS Akbar Killi	-do-
2	Tasleem Khan S/o Murrad Khan B.Sc	GHS. Jan Khan Killi	-do-
3	Jahanzeb Khan S/o Lalbaz Khan B.A	GHS, Faridi	-do-
4	M. Shaid S/o Sobbet Khan F.A	GHS, Faridi	-do-

P.T.O

F.R KOHAT

1	Aman Ullah Khan S/o Ghulam Nabi PTC, GPS. Bazi Kheil (C.T). B.A	GHS. Sharaki	-do-
2	Munsif Khan S/o Akram Khan B.A C.T	GHS Toor Chappa	-do-
3	Ashraf Noor S/O Gul Habib B.A C.T	GHS. Paya	-do-
4	Noor Alam S/o Mir Aslam B.A	GMS Jammu	-do-
5	Kamil Khan S/o Mir Ghulam F.Sc	GHS Toorki Ismail Khan	-do-
6	Nazir Hussain S/o Ghulam Jan F.A	GHS. Ara Khel	-do-

ORAKZAI AGENCY

1	Mirza Hassan S/o Faqir Hussain M.Sc Hon. Agri.	GHS Tooti Bagh	-do-
2	Shamsur Rehman S/o Hafiz Abdul Hadi, F.Sc	GMS Inzar Pattai	-do-
3	Syed Saghir Sayed S/o Syed Zarin Jan F.A	GHS Sarobe Ghari	-do-
4	Fazal Tariq S/o Fazal Khalid B.A	GHS Safal Dara	-do-

KURRAM AGENCY

1	Nasir Ali S/o Manzar Ali, B.A	GMS Sakhi Ahmad Shah	-do-
2	Marjan Ali S/o Nawab Ali, B.Sc	GHS Baggum	-do-
3	Noor Ali Shah S/o Ali Hassan Shah B.Sc	GHS Dogar	-do-
4	Shujat Ullah S/o Malik Aman Ullah B.Sc	GHS. Baly Amin	-do-
5	Sabir Hussain S/o Dost Mohammad B.A	GMS Shah Ibrahim	-do-
6	Syed Ahmad Raza S/o Muhammad Raza B.A	GMS Mirjamal	-do-
7	Syed Riaz Hussain S/o Syed Mir Hussain F.Sc	GMS Amalkot	-do-
8	Maqbool Hussain S/o Mudasir Ali	GMS Alamsher	-do-
9	S. Anayat Hussain S/o S. Akbar Jan B.A	GMS Ahmadzai	-do-
10	Subhan Ali S/o Sultan Ali B.A, C.T	GMS Luqman Khel	-do-
11	Jabir Hussain S/o M.Ali Shah	GMS Daradar	-do-
12	Jabir Ali S/o Ali Nabi, F.A	GMS Tindo	-do-
13	Shahzad Gul S/o Gul Ali, B.A, C.T	GMS Badama	-do-
14	Zulfiqar Ali S/o Mir Ali, F.Sc	GHS Uchat	-do-
15	Said Amin Hussain S/o S. Haider Hussain B.A, C.T Cont.	GHS Alizai	-do-

F.R BANNU

1	M. Shafiq Khan S/o Saifur Rehman B.A, B.ED, P.T.C	GMS Watin	-do-
2	Mir Payo S/o Hayat Ullah, P.T.C	GMS Wali Noor	-do-

N.W.A.

1. Naik Nawaz S/O Amir Khan, P.A. (olt:Sc)
2. Gul Sade Khan S/O Barmal Khan, P.A.
3. Mohammad Sadiq S/O Agil Khan, P.A.
4. Gul Agin S/O Nadain Khan, P.A.
Rahmatullah S/O Daria Khan, B.A.
5. Jalal Bat Khan S/O Makhan, P.A.
6. Mohammad Isheq S/O Mohammad Kamand, F.Sc.
7. Mohammad Musa S/O Zahir Khan, P.Sc.
8. Mohammad Ibrahim Khan S/O Mir Sade Jan, F.Sc.
9. Zar Samad Khan S/O Ahmad Khan, P.Sc.
10. Musamal Khan S/O Bistillah, P.A.
11. Sher Ali S/O Ali Khan, P.A.
12. Mohammad Farooq S/O Nasir Khan, B.A.
13. Haji Nawaz S/O Ali Hassan, P.A.
14. Nosher Khan S/O Umar Nawaz, P.A.

- GMS, Tall Village. C.T/S. 7. pas
- GMS. Zeligul Kot. /do-
- GMS Mitak Kot. -do-
- GMS. P. S. Kot. -do-
- GMS. Papli Picket. -do-
- GMS. Gulam Jan. -do-
- GMS. Rozi Killi. -do-
- GMS. Miran Shah. -do-
- GMS. Kanirogha. -do-
- Payo Jan kot. -do-
- GMS, Datta Khal. -do-
- GMS. & Khair Killi. -do-
- GMS. Dambil. -do-
- GMS. Mohammed Khal. -do-
- GMS, Shewa. (NWA). -do-

F.B.D.I. (G.N.)

1. Agil Khan S/O Hussein Khan, P.A.
2. Theanullah S/O Faridullah, P.A.
3. Mohammad Zahir S/O Annullah, F.Sc.
4. Noor Mohammad S/O Sher Muhammad, B.A.
5. Allan Jan S/O Mohammad Jan, P.A.
6. Mohammad Sadiq S/O Jattaji Khan, P.A. O.T. (Cont.)
7. Noor Amin S/O Syed Amin, P.A.
8. Sher Mohammad S/O Ali Bat Khan, P.A.

- GMS. Karicom. -do-
- GMS. Jandola. -do-
- GMS. Khirgi. -do-
- GMS. Jandola. -do-
- GMS. Koye Pekar. -do-
- GMS. Dara Zinda. -do-
- GMS. Landi Astanader. -do-
- GMS. Shekht Mila. -do-

S.W.A.

1. Mohammad Fiaz S/O Razi Khan, P.A.
2. Mohammad Sadiq S/O Mir Jan, P.A. (Pot:Sc)
3. Nazali S/O Mirza Wali Khan, P.A.
4. Usan Shah S/O Mirza Shah, P.A. B.Ed.
5. Hasmatullah S/O Mirza Khan, P.A.
6. Gul Mohammad S/O Gul Sur, P.A.
7. Noor Mohammad S/O Haq Hameed, P.A.
8. Mohammad Nozila S/O Mirza Foshan, P.A.
9. Manzoor Ahmad S/O Hashim Khan, P.A.
10. Mohammad Awol Khan S/O Mirza Jan, P.A.
11. Nasirud Din S/O Mirza Jan, P.A.
12. Mohammad Noor Jan S/O Sherif Khan, P.A.
13. Mano Khan S/O Ghazi Mirza Jan, P.A. (M.P.A.)
14. Zar Mohammad S/O Khanoc Khan, P.A.
15. Rajah Ali S/O Abbas Khan, P.A.

- GMS. Janata. -do-
- GMS. Kanigunnam. -do-
- GMS. Shahope. -do-
- GMS. Balanji Khan. -do-
- GMS. Malin Mila. -do-
- GMS. Deeba. -do-
- GMS. ... -do-

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- | | | |
|--|---------------------|-------------|
| 6. Shaukat Ali S/O Ghinai Gul, F.Sc. | GMS. Badrijagha Khe | S.V.V. Post |
| 17. Naqibullah, S/O Beharad Reshan, F.A. | GMS. Spin Kamar. | -do- |
| 18. Mohanna Khen S/O Ghazullah, B.A. | GMS. Mandana. | -do- |
| 19. Gul Zor Khan S/O Hesar Khan, B.Sc. | GMS. Amzarai. | -do- |

TERMS & CONDITIONS:-

1. Charge report should be submitted to all concerned. Their appointment are being made purely on temporarily basis and liable to termination at any time even before the expiry of the leave of the trainees when is required. In case they wish to resign their posts, they shall have to give one month's prior notice or forfeit one month's pay, in lieu thereof.
3. The original qualification certificate of birth and domicile certificate should be got checked before they are handed over charge of the post and attested copies thereof to be kept on the record of School. LA/Di. tests not allowed in any one.
5. They should be sent to the Agency/Civil Surgeon concerned for Medical Examination day on which they report their arrival for duty and no pay should be drawn for them unless and until they produce their health and age certificate from the said surgeon concerned.
6. Their verification roll of character and antecedents should be got completed and verified from the authorities concerned.
7. The pay scale and service rules would be subject to revision in accordance with the orders to be passed by the Government of NWFP from time to time.
8. They should not be handed over charge of the post if they are below 18 years or below 30 years of age. If they fail to resume charge within two weeks their vacancies should be reported to this Office ATONCE.
9. In case where schools are closed for winter vacations, the candidate should report their arrival when the School are re-opened after long winter vacations.

Encl: N. 5455-605

M. I. Khan
 DIRECTOR OF EDUCATION, 27.1.90.
 FATA, N.W.F.P. PESHAWAR.
 Dated 28/1/90.

Copy forwarded for information and necessary action to the :-

1. All the Agency Executive Officers concerned.
2. All the Headmasters Govt. High Schools concerned.
3. All the Candidates concerned.
4. IV. & VI. AL. Local Directorate.
5. P/Files.

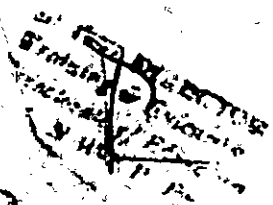
Book Post

M. I. Khan
 DIRECTOR OF EDUCATION, 27.1.90.
 FATA, N.W.F.P. PESHAWAR.

To
 The Head Master
 G. H. S. Khingal
 F. R. D. I. Khen



Ali



N.W.A

1	Naik Nawaz S/o Amir Khan F.A (Pot.Sc)	GMS Tall Village	-do-
2	Gul Sade Khan S/o Barmala Khan F.A	GMS Zaligul Kot	-do-
3	M. Sadiq S/o Aqil Khan F.Sc	GMS Liak Kot	-do-
4	Gul Amin S/o Nadmin Khan F.A	GMS Pariat	-do-
5	Jalal Bat Khan S/o Daria Khan	GMS Papli Pickot	-do-
6	Jalal Bat Khan S/o Makhan F.Sc	GMS Ghulam Jan	-do-
7	Muhammad Ishaq S/o M. Kamand F.Sc	GHS Rozi Kili	-do-
8	M. Musa S/o Zarin Khan F.Sc	GHS Miran Shah	-do-
9	M. Ismail S/o Mir Sha Jan, F.Sc	GMS Kanirogha	-do-
10	Zar Samand Khan S/o Ahmed Shah F.Sc	Payo Jan kot	-do-
11	Muzamil Khan S/o Bismillah F.Sc	GHS Datta Kheil	-do-
12	Sher Ali S/o Ali Khan B.A	GMS Khair Killa	-do-
13	M. Farooq S/o Nasir khan B.A	GMS Dambil	-do-
14	Haji Nawaz S/o Ali Hassan B.A	GHS Mohammad Khel	-do-
15	Nausher Khan S/o Umer Nawaz	GHS Shewn (NWA)	-do-

F.R D.I. KHAN

1	Aqal Khan S/o Hussain Khan F.A	GMS Kerikam	-do-
2	Ihsan ullah S/o Naimat ullah F.A	GHS Jandole	-do-
3	M. Zaman S/o Aman Ullah F.A	GHS Khirgi	-do-
4	Noor Mohamamd S/o Mohammad Jan B.A	GHS Jandola	-do-
5	Allah Jan S/o Mohammad Jan	GMS Koye Peshawar	-do-
6	M. Sadiq S/o Watahi Khan F.A	GHS Dara Zinda	-do-
7	Noor Amin S/o Syed Amin F.A	GMS Landi Astandar	-do-
8	Sher Mohammad S/o Ali Bat Khan F.A	GMS Shekh Mila	-do-

S.W.A

1	M. Fayaz S/o Rozi Khan F.Sc	GHS Janata	-do-
2	M. Sadiq S/o Allah Jan M.A (Pot.Sc)	GHS Kanigurram	-do-
3	Nauz Ali S/o Mian Wali Khan B.Sc. B.ED	GHS Shahood	-do-
4	Uneen Shah S/o s. bal Shah	GMS Balargigs	-do-
5	Namat Ullah S/o Niaz ullah	GMS Malik Mils	-do-
6	Gul Mohammad S/o Gul Subhan	GMS Deeba	-do-
7	Noor Mohammad S/o Haq Hussain		-do-
8	M. Niazuddin S/o Moghal Roshan		-do-
9	Manzoor Ahmed S/o Badshah Jan B.A		-do-
10	M. Noor Jan S/o Shehzad Khan		-do-
11	Mohammad Awal Khan S/o Shadi Khan B.A		-do-
12	M. Noorudin S/o Shahid Khan B.A		-do-
13	Mano Khan S/o Ghazi Marjan Khan B.A		-do-
14	Zar Mohammad S/o Khanoon Khan F.Sc		-do-
15	Rajih Ali S/o Abbass Khan F.Sc		-do-

P.T.O

Ali

16	Shaukat Ali S/o Khindi Gul FSc	GMS Badri Jagha	-do-
17	Naqib Ullah S/o Sharmad Roshan F.Sc	GMS Spin Kamar	-do-
18	Mohammad Khan S/o Ghaiz Ullah B.A	GMS Mandana	-do-
19	Gul Zar S/o Usman Khan	GMS Amzarai	-do-

TERMS & CONDITIONS

1. Charge report should be submitted to all concerned.
2. Their appointment are being made purely on temporally basis and the level to nomination any time even before the expiry of the leave of the trainees and when is required. In case they wish to resign their seats, they shall have to give one months prior notice or foresaid one months pay lieu thereof.
3. The original qualification certificate of birth and domicile certificate should be checked out before they handed over charge of the post and attest copies thereof be kept on the record of the post and attest copies thereof be kept on the record of school.
4. TA/DA etc is not allowed in any one.
5. They should be sent to the Agency/Civil Surgeon concerned for Medical Exam: the day on which they report their arrival for duty and no pay should be drawn for them unless and until they produce their health and age certificate from the said surgeon concerned.
6. Their verification roll of character and antecedents should be got completed and verified from the authorities concerned.
7. The pay scale and service rules would be subject to revision in accordance with the orders to be passed by the Government of NWFP from time to time.
8. They should not be handed over charge of the post if they are below 48 years and below 30 years of age, if they fail to resume charge within two weeks their vacancies should be reported to this office.
9. In case where schools are closed for winter vacations, the candidates should report their arrival when the schools are re-opened after long winter vacations.

**DIRECTOR OF EDUCATION
FATA, N.W.F.P PESHAWAR**

Endst. N 5455-605

1. All the Agencies Education Officers concerned.
2. All the Headquarters gave High Schools concerned.
3. All the Candidates concerned.
4. IV.D/VII. All General Directorate
5. P/Files.

**DIRECTOR OF EDUCATION
FATA N.W.F.P PESHAWAR**

(Annex-B)

(15)

OFFICE OF THE DIRECTORATE OF SECONDARY EDUCATION NWFP, PESHAWAR.

NOTIFICATION.

Mr. Mohammad Zaman, CT. of G.M.S. Sobati Kach, FR, Tank, is hereby transferred/ordered to G.M.S. Maghzai, Distt: Tank against the vacant post of CT, in his own pay grade in the interest of public service with immediate effect.

Note:- Charge report should be sent to all concerned.

NO TA/DA is allowed.

Seniority be determined at the bottom of the seniority list of District.

The E.D.O. (Lit:&Edu:) Tank and Headmaster GMS, Maghzai, Tank, are required to check documents of the teacher transfer from GMS, Sobati Kach, FR, Tank, if any discrepancy found, be reported before handing over charge to them.

DEPUTY DIRECTOR SECONDARY
EDUCATION NWFP, PESHAWAR.

Endat: No. 3593-99 A-15/CT/Transfer Tank, Dated 28 /11/2001.

Copy forwarded to the:-

1. E.D.O. (Lit:&Edu:) District Tank and A.E.O. FR, Tank.
2. District Accounts Officer Tank.
3. Headmaster, GMS, Sobati Kach, FR, Tank.
4. Headmaster, GMS, Maghzai, Distt: Tank.
5. Teacher concerned.
- 6.

S. S. D.
28.11.2001

Ali Khan
Qureshi

S. S. D.
28.11.2001
DEPUTY DIRECTOR SECONDARY
EDUCATION NWFP, PESHAWAR.

OFFICE OF THE DIRECTORATE OF SECONDARY EDUCATION NWFP PESHAWAR

NOTIFICATION:

Mr. Mohammad Zaman, CT of G.M.S Sobati Kach, FR, Tank is hereby transferred/ordered to G.M.S Maghzai, Distt, Tank against the vacant post of CT, in his own pay grade in the interest of public service with immediate effect.

Note:- Charge report should be sent to all concerned.

No TA/DA is allowed.

Seniority be determined at the bottom of the seniority list of District.

The E.D.O (Lit: & Edu) Tank and Headquarter GMS, Maghzai Tank, are required to check documents of the teacher transfer from GMS, Sobati Kach FR, Tank if any discrepancy found, be reported before handing over charge to them.

**DEPUTY DIRECTOR SECONDARY
EDUCATION, NWFP, PESHAWAR**

Endst No. 3593-99 A-15/CT/Transfer Tank, Dated 28/11/2001.

Copy of forwarded to the:-

- 1.2. E.D.O (Lit: & Edu:)) District Tank and A.E.O FR, Tank.
3. District Accounts Officer Tank.
4. Headmaster, GMS, Sobati Kach, FR, Tank.
5. Headmaster, GMS, Maghzal, Distt: Tank.
6. Teacher concerned.

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**GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

Dated Peshawar, 11.07.2012

NOTIFICATION:

No. SO (B & A) / I-18/E&SE/2012:

Sanction of the Government of Khyber Pakhtunkhwa is hereby accorded to the up gradation of the posts for Grant of Incentive of Higher Pay Scale to different Categories/Cadres of teachers in Elementary & Secondary Education Department w.e.f. 01-07-2012 as per details given below:-

Sr. No.	Nomenclature of Teaching Cadre Post	Location	Existing Basic Pay Scale	New Approved Basic Pay Scale	Remarks
1.	Primary School Teacher (PST)	Govt. Primary School	BPS-5 BPS-6 BPS-7 BPS-9 BPS-10 BPS-11	(BPS-12)	The post of PST is upgraded to BPS-12. Accordingly, 33,497 posts of PSTs already sanctioned in various pay scales are upgraded to BPS-12 for the present incumbents as well as future appointees.
2.	Senior Primary School Teacher (Sr. PST)	"do"	Newly Upgraded/ Redesignated Post	(BPS-14)	22,331 posts of the existing PSTs in various existing pay Scales are upgraded to BPS-14 and redesignated as Senior PST. The posts will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
3.	Primary Head Teacher (PHT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-15)	20,804 posts of the existing PST's (one post in each Primary School) are upgraded to BPS-15 and redesignated as Primary School Head Teacher, and will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
	Certified Teachers (CT)	Govt. Middle/High/Higher Secondary School	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of CTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
	Senior Certified Teachers (Sr. CT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total CT posts are upgraded to BPS-16 and redesignated as Senior CTs which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
	Arabic Teachers (A.T)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of ATs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
	Senior Arabic Teachers (Sr. AT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total AT posts are upgraded to BPS-16 and redesignated as Senior AT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
	Teacher of Theology (TT)	"do"	BS-07 BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of TTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
	Senior Teacher of Theology (Sr. TT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total TT posts are upgraded to BPS-16 and redesignated as Senior TT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
	Drawing Masters (DM)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of DMs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
	Senior Drawing Masters (Sr. DM)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total DM's posts are upgraded to BPS-16 and redesignated as Senior DM, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or

12.	Physical Education Teachers (PET's)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of PET's are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
13.	Senior Physical Education Teachers (Sr. PET's)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total PET's posts are upgraded to BPS-16 and redesignated as Senior PET, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
14.	Qari/Qaria	"do"	BPS-7 BPS-9 BPS-10 BPS-12 BPS-14 BPS-15	(BPS-12)	All the existing posts of Qari/Qaria are upgraded to BPS-12 for the present incumbents to the post as well as future appointees.
15.	Sr.Qari/Sr.Qaria	"do"	Newly Upgraded/Redesignated Post	(BPS-15)	One thirds (1/3 rd) of the total Qari/Qaria posts are upgraded to BPS-15 and redesignated as Senior Qari/Qaria, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.

2. A policy shall also be devised in the framework of input/output criteria in terms of qualification, length of service, regularity, punctuality, results, curricular and co-curricular achievements and other performance indicators, so that the teachers do not take the scheme for granted but work for it.

3. District wise/ school wise-breakup of the posts is enclosed herewith as Annexure-A.

SECRETARY

Endst: No. SO(FR)/FD/10-22(E)/2010-Dated Pesh. Jc 15/07/2012

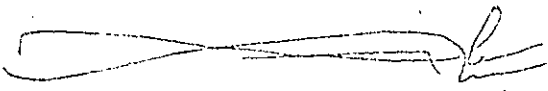
Copy is forwarded to Accountant General Khyber Pakhtunkhwa, Peshawar.
All District Account Officers


SECTION OFFICER (FR)
FINANCE DEPARTMENT

Endst. Of even Number & Date.

Copy of the above is forwarded to:-

1. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department, with reference to his letter No SO(FR)/FD/10-22(E)/2010 dated 26.06.2012.
2. P.S. to Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
3. P.S. to Special Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
4. P.S. to Deputy Secretary-II, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
5. P.S. to Minister of E&SE, Khyber Pakhtunkhwa.
6. The Director, E&SE Khyber Pakhtunkhwa, Peshawar.
7. All the Executive District Officers, E&SE Khyber Pakhtunkhwa.
8. The Managing Director, Printing Press, Khyber Pakhtunkhwa, Peshawar.
9. Master file.


(NOOR ALAM KHAN WAZIR) 11/07/2012
SECTION OFFICER (B&A)
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

OFFICE OF THE EXECUTIVE DISTRICT OFFICER, ELEMENTARY & SECY: EDUCATION TANK.

General Seniority List of CT (G) Teachers (Male)

S.No	Name of Teacher	Acad:	Prof:	Father, s Name	BPS	Date of Birth	Dom:	Date of 1st entry in Govt: Service	Date of Apptt: in-the present post	Place of Posting	Remarks
1	Khwaja Muhammad ✓	FA	CT	Niaz Muhammad	12	19/01/1955	Tank	24/08/1977	17/12/1980	GHS Kirri Haider	
2	Wazir Azam ✓	BA	CT	Ghulam Dastagir	15	10/01/1957	Tank	14/11/1983	14/11/1983	GHS Kot Hakeem	
3	Abdul Karim ✓	B.A	B.Ed	Muhammad Amin	15	10/12/1952	Tank	20/12/1980	01/12/1986	GHS Pai	Retired
4	Ikram Ullah ✓	MA	B.Ed	Mubarak shah	15	16/03/1965	Tank	03/12/1986	03/12/1986	GHS M.Akbar	S/B Not Pro:
5	Muhammad Shafiq ✓	MA	B.Ed	Ghulam Saddiq	15	15/04/1958	Tank	26/02/1980	26/05/1987	GCMHS No.1 Tank	
6	Muhammad Khusdil ✓	B.A	B.Ed	Nasrullah Jan	15	02/05/1957	Tank	01/09/1976	22/10/1987	GHS Pai	
7	Iqbal Ahmad ✓	MA	B.Ed	Ahmad Khan	15	08/03/1967	Tank	24/11/1987	24/11/1987	GHS Gomal Bazer	
8	Habib Ullah ✓	BA	CT	Hayat Ullah	15	12/04/1960	Tank	21/11/1982	29/11/1987	GHSS Gul Imam	
9	Tariq Mahmood ✓	BA	B.Ed	Rahim Bakhsh	15	08/02/1965	Tank	16/10/1984	15/05/1988	GCMHS No.1 Tank	
10	Abdul Baqi Khan ✓	SSC	CT	Abdul Hadees khan	12	22/10/1956	Tank	22/06/1976	14/06/1988	GMS Aada Umer	
11	Javaid Akhtar ✓	MA	B.Ed	Muhammad Bakhsh	15	02/06/1965	Tank	01/09/1988	01/09/1988	GCMHS No.1 Tank	
12	Muhammad Mustaq ✓	BA	CT	Malik Sarfaraz	15	20/10/1959	Tank	24/11/1980	07/12/1988	GMS Memraiz Pathan	S/B Not Pro:
13	Noor Ali Jan ✓	FA	CT	Sakhi Jan	12	15/04/1956	Tank	05/12/1980	16/01/1990	GHS Sheikh Uttar	
14	Amir Nawaz ✓	BA	CT	Shah Nawaz	15	18/03/1963	Tank	01/02/1984	17/01/1990	GHS K.Marwati	
15	Muammad Bilal ✓	MA	B.Ed	Khan Gul	15	01/10/1965	Tank	01/03/1990	01/03/1990	GMS Tank Cantt	
16	Shafi Ullah khan ✓	MA	B.Ed	Aman Ullah Khan	15	09/02/1965	Tank	29/10/1985	16/04/1990	GCMHS No.1 Tank	
17	Sher Azmat ✓	BA	CT	Gul Khan	15	10/10/1957	Tank	22/11/1983	11/10/1990	GCMHS No.1 Tank	
18	Inayat Ullah ✓	MA	B.Ed	Shah Alam	15	01/03/1965	Tank	26/01/1991	26/01/1991	GHSS Gul Imam	
19	Shafiq Ur Rehman ✓	BA	CT	Taj Muhammad	15	03/04/1963	Tank	11/12/1986	14/03/1991	GHS M.Akbar	
20	Ghulam Ahmad kabir ✓	MA	B.Ed	Khan Zaman	15	15/05/1963	Tank	28/10/1985	14/03/1991	GMS Chadrar	
21	Fazal Rahim ✓	MA	B.Ed	Ghazi Marjan	15	08/04/1965	Tank	18/12/1986	14/03/1991	GHS Mulliazai	
22	Aziz Ur Rehman ✓	M.Sc	B.Ed MEd	Abdul Rahim	15	12/10/1962	Tank	12/01/1987	22/10/1991	GMS Kot Musa	

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S.No	Name of Teacher	Acad:	Prof:	Father, s Name	BPS	Date of Birth	Dom:	Date of 1st entry in Govt: Service	Date of Apptt: in the present post	Place of Posting	Remarks
23	Abdul Rauf ✓	BA	CT	Haji Kala khan	15	12/04/1964	Tank	12/05/1988	22/10/1991	GMS Sheikh Sultan	
24	Aziz Ur Rehman ✓	BA	CT	Shah Zaman	15	15/12/1960	Tank	02/11/1988	03/04/1992	GHS Gara Shahbaz	
25	Rahmat Shah ✓	MA	CT MEd	Azam Shah	15	02/04/1967	Tank	30/04/1992	30/04/1992	GHS Gomal Bazar	
26	Ishfaq Mahmood ✓	MA	B.Ed	Sultan Mahmood	15	10/10/1969	Tank	30/04/1992	30/04/1992	GHS Ranwal	
27	Mumtaz Khan ✓	MA	B.Ed	Janan Khan	15	15/01/1969	Tank	12/05/1992	12/05/1992	GCMHS No.1 Tank	
28	Ghulam Qasim ✓	MA	M.Ed	Abdul Hakeem	15	25/02/1969	Tank	12/05/1992	12/05/1992	GCMHS No.1 Tank	
29	Shah wali khan ✓	MA	M.Ed	Sultan Sikandar	15	04/09/1966	Tank	20/05/1992	20/05/1992	GMS Hayat korona	
30	Izat Khan ✓	B.Sc	CT	Said Ayaz	15	24/02/1965	Tank	01/06/1992	01/06/1992	GHS Tajori	
31	Tariq Mahmood ✓	MA	B.Ed	Muhammad Qasim	15	07/11/1958	Tank	18/10/1987	22/11/1992	GCMHS No.1 Tank	
32	Anwar khan ✓	M.Sc	B.Ed	Ahmad Jan	15	01/03/1962	Tank	17/02/1988	22/11/1992	GMS Cheena	
33	Wahid Ullah ✓	MA	B.Ed	Mira Jan	15	12/04/1968	Tank	09/09/1987	18/02/1993	GHS Kaka khel	
34	Jamshaid Ahmad ✓	BA	B.Ed	Amir Muhammad	15	20/05/1968	Tank	18/02/1993	18/02/1993	GHS Bazai	
35	Gul Haleem Shah ✓	MA	CT	Gul Bahram khan	15	10/04/1970	Tank	18/02/1993	18/02/1993	GHS Bazai	
36	Habib Ullah ✓	MA	CT B.Ed	Qatal khan	15	01/01/1968	Tank	20/02/1993	20/02/1993	GHS Ranwal	
37	Rafi Ullah ✓	MA	B.Ed	Karim khan	15	05/03/1970	Tank	25/09/1988	21/02/1993	GHS Mullazai	
38	Shafqat Ullah ✓	BA	CT	Abdullah	14	21/04/1969	Tank	22/03/1993	22/03/1993	GHS No.2 Tank	
39	Mazhar Ali Shah ✓	MA	CT	Murid Hashim Shah	15	02/11/1969	Tank	26/05/1993	26/05/1993	GMS Kot Allah Dad	
40	Atta Ullah ✓	BA	CT	Ahmad Jan	15	02/02/1958	Tank	09/10/1989	29/05/1994	GHSS Gul Imam	
41	Akbar zaman ✓	MA	B.Ed	Sher Zaman	15	07/11/1959	Tank	04/02/1990	29/05/1994	GMS Kot Musa	
42	Abdul Hanan ✓	MA	B.Ed	Painda Khan	15	24/12/1964	Tank	01/10/1989	29/05/1994	GHS Akbari	
43	Adam khan ✓	BA	CT	Muhammad Ramzan	15	06/02/1967	Tank	25/10/1989	29/05/1994	GHS No.3 Tank	
44	Ghulam Sarwar ✓	FA	CT	Ghulam Sattar	9	11/09/1968	Tank	25/10/1989	29/05/1994	GMS Nasran	
45	Hidayat Ullah ✓	BA	CT	Saif ullah	15	30/11/1968	Tank	26/10/1989	29/05/1994	GMS Cheena	
46	Salah Ud Din ✓	BA	CT	Saad Ullah Khan	15	06/05/1970	Tank	13/03/1990	29/05/1994	GMS Nandoor	
47	Abdul Razaq ✓	MA	B.Ed	Ghulam Qadir	15	04/01/1963	Tank	20/11/1982	14/11/1994	GMS Naurang	
48	Abdullah Khan ✓	M.Sc	B.Ed	Abdul Hayi	15	01/03/1964	Tank	15/11/1994	15/11/1994	GHSS Gul Imam	

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S.No	Name of Teacher	Acad:	Prof:	Father, s Name	BPS	Date of Birth	Dom:	Date of 1st entry in Govt: Service	Date of Apptt: in the present post	Place of Posting	Remarks
✓ 49	Imran Ghani ✓	MA	CT	Usman Ghani	15	10/01/1971	Tank	15/11/1994	15/11/1994	GMS Kot Alla Dad	
✓ 50	Ahya Ud Din Shah ✓	BA	B.Ed	Mahboob Shah	15	30/04/1971	Tank	15/11/1994	15/11/1994	GHS Mullazai	
✓ 51	Khiyal Gul ✓	MA	B.Ed	Abdul Manan	15	04/01/1969	Tank	10/09/1987	03/12/1994	GMS Raghza	
✓ 52	Muhammad Rafiq ✓	MA	B.Ed	Ghulam Hassan	15	08/09/1962	Tank	08/09/1985	04/12/1994	GCMHS No.1 Tank	
✓ 53	Gul Zaman ✓	MA	B.Ed	Said Ahmad	15	16/09/1963	Tank	14/12/1985	03/12/1994	GMS Tank Cantt	3-12-1994
✓ 54	Sibghat Ullah ✓	BA	CT	Aman Ullah	15	10/03/1968	Tank	07/12/1994	07/12/1994	GMS Naurang	
✓ 55	Fateh Ullah ✓	MA	B.Ed	Atta Ullah Khan	15	15/01/1966	Tank	05/10/1986	08/12/1994	GHS Mullazai	
✓ 55	Raja Ghazanfar Ali ✓	MA	B.Ed	Rahim Bakhsh	15	08/08/1968	Tank	04/10/1986	08/12/1994	GMS Bara kha	
✓ 57	Habib Khan ✓	B.Sc	CT	Gul Bagh	15	05/05/1969	Tank	09/01/1995	09/01/1995	GHS Daraki	
✓ 58	Mehtab Hussain ✓	BA	CT	Haq Nawaz shah	15	16/04/1964	Tank	15/12/1985	13/01/1996	GHS Toran Nau	
✓ 59	Azad Khan ✓	MA	B.Ed	Badshah Khan	15	01/02/1964	Tank	21/01/1996	21/01/1996	GHSS Gul Imam	21-4-96 60
✓ 60	Muhammad Ayub ✓	M.Sc	CT	Muhammad Aslam	15	20/03/1962	Tank	22/01/1996	22/01/1996	GHS Tajori	21-4-96 59
✓ 61	Hidayat Ullah ✓	BA	CT	Haji Muhammad Sultan	15	10/07/1969	Tank	09/05/1996	09/05/1996	GHS Kaka kha	
✓ 62	Saif Ur-Rehman ✓	B.A	B.Ed	Musa Khan	15	15/01/1969	Tank	09/09/1987	01/06/1996	GHS Pai	
✓ 63	Murtaza Khan ✓	MA	B.Ed	Said Khan	15	01/03/1970	Tank	28/09/1987	01/06/1996	GMS Wanda Zelo	
✓ 64	Ihsan Ullah ✓	BA	B.Ed CT	Naimat Ullah	15	05/03/1967	Tank	23/05/1992	13/06/1996	GMS Tator	
✓ 65	Habib Khan ✓	MA	M.Ed	Ibrahim Khan	15	02/03/1968	Tank	01/03/1993	17/01/1998	GMS Kot Nawaz	
✓ 65	Qismat Ali Khan ✓	MA	CT	Muhammad Ali Khan	15	07/07/1968	Tank	09/09/1987	17/01/1998	GHS Mullazai	
✓ 67	Abu Suleman ✓	BA	CT	Haji Abdul Khalig	15	29/05/1962	Tank	21/10/1989	20/10/1998	GMS Kot Murtaza	
✓ 68	Allao-Din ✓	BA	CT	Khan	15	16/04/1966	Tank	24/03/1987	05/04/1999	GHS Gara Baloch	
✓ 69	Muhammad Ayub ✓	BA	CT	Gul Rang	15	11/02/1962	Tank	01/11/1984	06/04/1999	GHS No.3 Tank	
✓ 70	Muhammad Rafiq ✓	BA	CT	Ahmad Saeed	15	20/02/1962	Tank	16/04/1984	06/04/1999	GMS Sheikh Sultan	
✓ 71	Gohar Ali ✓	MA	CT	Umar Khan	15	10/08/1962	Tank	06/04/1999	06/04/1999	GHS Umar Kha	
✓ 72	Ahmad Nazir ✓	BA	CT	Said Rasool	15	20/03/1964	Tank	13/03/1990	06/04/1999	GHS No.2 Tank	
✓ 73	Shafqat Ullah ✓	MA	CT	Aman ullah Khan	14	16/09/1964	Tank	05/11/1983	06/04/1999	GHS Akbari	
✓ 74	Abdullah Khan ✓	MA	CT	Ayaz Khan	15	01/01/1965	Tank	25/09/1988	06/04/1999	GMS Kot Nawaz	

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S.I	Name of Teacher	Acad:	Prof:	Father, s Name	BPS	Date of Birth	Dom:	Date of 1st entry in Govt: Service	Date of Apptt: in the present post	Place of Posting	Remarks
75	Syed Zahir Shah ✓	BA	CT	Syed Haq Nawaz Shah	15	24/06/1965	Tank	04/10/1986	06/04/1999	GMS Tator	
76	Muhammad Riaz ✓	M.A	M.Ed	Obed Ullah Jan	15	02/01/1966	Tank	09/05/1985	06/04/1999	GHS Pai	
77	Zahir Shah ✓	BA	CT	Abdul Aziz	15	07/04/1966	Tank	09/09/1985	06/04/1999	GHS M.Akbar	
78	Saif Ullah Jan ✓	BA	CT	Younas jan	15	15/01/1967	Tank	22/10/1986	06/04/1999	GHS Daraki	
79	Abdul Jalil ✓	BA	CT	Naeem Khan	15	22/02/1967	Tank	27/01/1986	06/04/1999	GMS Manjhi	S/B Not Pro:
80	Illahi Bakhsh ✓	MA	CT	Khuda Bakkhsh	15	05/03/1967	Tank	22/10/1986	06/04/1999	GMS Kot Kat	S/B Not Pro:
81	Amir Nawaz ✓	MA	M.Ed	Muhammad Ayaz Khan	15	25/04/1968	Tank	09/09/1987	06/04/1999	GMS L. Michen Khel	
82	Muhammad Hashim ✓	MA	CT	Mosa khan	15	04/04/1969	Tank	09/09/1987	06/04/1999	GHS Gomal Bazar	
83	Sana Ullah ✓	MA	M.Ed	Atta Ullah	15	04/04/1969	Tank	06/04/1999	06/04/1999	GCMHS No.1 Tank	
84	Farid Ullah ✓	BSc	M.Ed CT	Akbar khan	15	10/03/1971	Tank	25/10/1995	06/04/1999	GHS Amakhel	
85	Khan Zaman ✓	B.Sc	CT B.Ed	Abdul Khaliq	15	12/03/1971	Tank	01/07/1997	06/04/1999	GHS Ranyal	
86	Sibghat Ullah ✓	MA	B.Ed	Aman Ullah	15	25/08/1972	Tank	06/04/1999	06/04/1999	GHS No.2 Tank	
87	Akbar Ali ✓	MA	CT	Noor Kamal	15	12/05/1960	Tank	15/12/1985	07/04/1999	GHS Amakhel	
88	Aziz Ullah ✓	BA	B.Ed	Aman Ullah	15	10/04/1967	Tank	05/10/1986	07/04/1999	GMS Gara Budha	
89	Maqsood Ul Hassan ✓	BA	CT	Mahmood Ul Hassan	15	01/04/1974	Tank	07/04/1999	07/04/1999	GHS No.2 Tank	
90	Sabir Nawaz Khan ✓	B.Sc	CT	Haq Nawaz khan	15	15/03/1971	Tank	08/04/1999	08/04/1999	GHS Daraki	
91	Mumtaz Khan ✓	BA	B.Ed	Rasool Khan	15	06/08/1962	Tank	25/09/1988	16/04/1999	GHS Pai	
92	Abdul Rasheed ✓	MA	B.Ed	Khuda Bakkhsh	15	10/01/1963	Tank	13/03/1990	16/04/1999	GHS No.2 Tank	
93	Shah Malook ✓	BA	CT	Abdul Malik	15	06/04/1965	Tank	14/05/1988	16/04/1999	GMS Sher Ali	
94	Abdul Majeed ✓	BA	CT	Saad Ullah	15	01/04/1970	Tank	16/04/1999	16/04/1999	GMS Kot Allah Dad	S/B Not Pro:
95	Mushtaq Ahmad ✓	MA	B.Ed	Mumtaz Khan	15	05/03/1973	Tank	19/04/1999	19/04/1999	GCMHS No.1 Tank	
96	Salamat Ullah ✓	MA	B.Ed	Mirza Ali	15	02/03/1969	Tank	20/09/1987	04/06/1999	GHS Akbari Gul Imam	
97	Naimat Ullah ✓	BA	B.Ed	Sultan Akbar shah	15	12/11/1967	Tank	16/12/1985	23/12/1999	GMS Hayat korona	
98	Khalid Mahmood ✓	MA	B.Ed	Rahim Bakhsh	15	08/04/1964	Tank	08/09/1985	24/12/1999	GCMHS No.1 Tank	
99	Aman Ullah ✓	BA	CT	Atta Ullah	15	02/02/1967	Tank	24/12/1999	24/12/1999	GMS Sher Ali	
100	Abdul Aziz ✓	BA	CT	Noor Muhammad	15	07/04/1958	Tank	04/05/1986	01/01/2000	GHS Gul Imam	

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S.No	Name of Teacher	Acad:	Prof:	Father, s Name	BPS	Date of Birth	Dom:	Date of 1st entry in Govt: Service	Date of Apptt: in the present post	Place of Posting	Remarks
✓ 101	Kifayat ullah ✓	MA	CT	Naimat Ullah	15	01/01/1969	Tank	15/04/1987	01/01/2000	GHS Toran Nau	
✓ 102	Asmat Ullah ✓	MA	B.Ed	Wazir Khan	15	20/04/1967	Tank	21/09/1998	01/10/2000	GHS Gomal Bazar	
✓ 103	Farman Ullah ✓	MA	B.Ed	Muhammad Ayub khan	15	25/08/1976	Tank	03/02/2001	03/02/2001	GMS Dabara	
✓ 104	Muhammad Younas ✓	MA	B.Ed	Gul Khan	15	01/06/1956	Tank	17/09/1974	01/07/2001	GHS Gara Shahbaz	
✓ 105	Muhammad Zaman ✓	MA	B.Ed	Aman Ullah	15	01/01/1969	Tank	01/02/1990	01/12/2001	GHS Maghzai	23-4-87
✓ 106	Gohar Zaman ✓	M.Sc	M.Ed	Muhammad Ramzan	15	15/01/1973	Tank	10/05/1994	12/08/2002	GHS Gomal Bazar	S/B Not Pro:
✓ 107	Tariq Zaman ✓	M.Sc	M.Ed	Pir Ghulam	15	03/06/1977	Tank	21/04/1999	12/08/2002	GHS Gara Baloch	
✓ 108	Khizar Hayat ✓	BA	CT	Payo khan	15	01/07/1958	Tank	27/10/1985	11/09/2003	GMS Chadrar	
✓ 109	Abdul Wali ✓	MA	B.Ed	Sultan Sikandar	15	04/02/1964	Tank	17/10/1984	15/03/2004	GMS Andari	
✓ 110	Adam khan ✓	BA	CT	Muhammad Khan	15	10/08/1963	TanK	10/03/1983	16/03/2004	GMS Kot Azam	
✓ 111	Asmat Ullah ✓	BA	CT	Muhammad Alam khan	14	21/03/1964	Tank	16/03/2004	16/03/2004	GHS Bazai	S/B Not Pro:
✓ 112	Inayat Ullah ✓	BA	CT	Nazar Din	15	08/09/1965	Tank	17/10/1984	16/03/2004	GMS Andari	S/B Not Pro:
✓ 113	Hussain Ali ✓	BA	CT	Haji Ghulam Qasim	15	03/12/1967	Tank	05/10/1986	16/03/2004	GMS Nandoor	
✓ 114	Seen Azam ✓	MA	B.Ed	Mosam khan	15	01/02/1968	Tank	05/10/1986	16/03/2004	GHSS Gul Imam	
✓ 115	Masood Ahmad ✓	MA	M.Ed	Karim Bakhsh	15	20/12/1971	Tank	29/03/1992	16/03/2004	GHS No.2 Tank	
✓ 116	Saadat Khan ✓	MA	CT	Soorat khan	15	15/08/1969	Tank	21/10/1989	01/07/2004	GHS Gomal Bazar	
✓ 117	Habib Ullah ✓	FA	CT	Hidayat Ullah	9	04/10/1978	Tank	31/01/2005	31/01/2005	GHS Umar Khel	
✓ 118	Abdul Latif ✓	BA	CT	Ghulam Qadir	15	11/04/1956	Tank	21/03/1983	10/05/2006	GMS Manjhi	
✓ 119	Haq Dad ✓	BA	CT	Sahib Dad	15	10/04/1962	Tank	05/10/1986	10/05/2006	GMS Kot Kat	
✓ 120	Abdul Haleem ✓	BA	CT	Abdul Malik	15	21/04/1964	Tank	06/05/1984	10/05/2006	GMS L.Michen Khel	
✓ 121	Gul Marjan ✓	MA	B.Ed	Abdullah Jan	15	01/03/1965	Tank	26/09/1988	10/05/2006	GCMHS No.1 Tank	
✓ 122	Amir Ahmad ✓	FA	CT	Rahmat Ullah	10	22/06/1965	Tank	05/10/1986	10/05/2006	GHS Amakhel	
✓ 123	Nayyar Zaman ✓	MA	B.Ed	Samandar khan	15	01/09/1966	Tank	07/01/1986	10/05/2006	GHS Kot Khadak	S/B Not Pro:
✓ 124	Shams Uz Zaman ✓	BA	CT	Sher Zaman	15	01/03/1967	Tank	09/09/1987	10/05/2006	GHS K.Marwati	S/B Not Pro:
✓ 125	Abdur Rashid Shakeel ✓	BA	CT	Abdus Saeed	15	08/08/1969	Tank	25/09/1988	10/05/2006	GMS Gara Budha	
✓ 126	Aslam khan ✓	MA	CT	Akram khan	15	24/03/1971	Tank	29/03/1992	10/05/2006	GHS Kot Hakeem	S/B Not Pro:

Abdul
Qadir

S.No	Name of Teacher	Acad:	Prof:	Father, s Name	BPS	Date of Birth	Dom:	Date of 1st entry in Govt: Service	Date of Apptt: in the present post	Place of Posting	Remarks
127	Muhammad Ismail ✓	MA	B.Ed	Shahab Ud Din	15	14/08/1973	Tank	19/09/2004	10/05/2006	GHS Mujilazai	
128	Shahid Zaman ✓	M.Sc	M.Ed	Muhammad Ramzan	15	15/03/1974	Tank	18/09/2004	10/05/2006	GHS Gara Baloch	
129	Muhammad Tariq ✓	MA	M.Ed	Bahadar Sher Khan	15	10/03/1976	Tank	31/10/1996	10/05/2006	GHS Amakhel	
130	Hamid Ullah ✓	MA	B.Ed	Abdullah Khan	15	08/05/1976	Tank	21/04/1999	✓10/05/2006	GHS Akbari	D.O.B. 5/8/76
131	Ashraf Ali ✓	MA	B.Ed	Gul Nawaz	15	14/04/1978	Tank	21/04/1999	10/05/2006	GHS Toran Nau	
132	Ghulam Qasim ✓	BA	CT	Fayyaz Muhammad	15	06/10/1954	Tank	12/07/1975	01/09/2007	GHS Ranwal	
133	Zahoor Hussain ✓	FA	CT	Manzoor Hussain	15	13/02/1966	Tank	09/09/1987	01/09/2007	GMS Tank Cantt	
134	Habib Khan ✓	BA	CT	Toti Khan	15	11/02/1968	Tank	12/09/1987	01/09/2007	GHS Daraki	
135	Noor Zaman ✓	BA	CT	Ghulam Farid	15	01/08/1971	Tank	01/09/2007	01/09/2007	GMS Mamraiz Pathan	
136	Fayyaz Muhammad ✓	MA	CT	Sardar Khan	15	07/12/1975	Tank	01/09/2007	01/09/2007	GHS Kirri Haider	
137	Gohar Khan ✓	BA	B.Ed	Dilawar Khan	15	20/02/1968	Tank	21/09/1998	02/12/2007	GHS Kirri Haider 89	S/B Not Pro:
138	Ghulam Ghaus ✓	MA	CT	Ghulam Dastagir	14	17/01/1980	Tank	01/03/2008	01/03/2008	GHS Gara Shahbaz	
139	Imran Ullah ✓	M.Sc	B.Ed	Aman Ullah	14	13/03/1983	Tank	01/03/2008	01/03/2008	GHS No.2 Tank	
140	Sardar Ali ✓	M.Sc	B.Ed	Sabz Ali	14	16/05/1976	Tank	01/04/2008	01/04/2008	GHS Sheikh Uttar	
141	Fazal e Haq ✓	BA	CT	Siad Alam	14	01/02/1988	Tank	01/09/2010	01/09/2010	GMS Nasran	
142	M. Amin ul Haq ✓	MA	B.Ed CT	Sarwar Khan	14	03/03/1980	Tank	01/10/2011	01/10/2011	GCMHS No.1 Tank	
143	Mehr Khan ✓	BA	CT	Hakeem Khan	15	01/02/1958	Tank		24/10/2012	GHS Gomal Bazar	
144	Shakir Ullah Khan ✓	BA	CT	Agha Jan	15	03/05/1958	Tank		24/10/2012	GHS Kirri Marwati	
145	Muhammad Abbas Khan ✓	BA	CT	Muhammad Akram Khan	15	15/03/1961	Tank		24/10/2012	GMS Raghza	
146	Khaliyal Mir ✓	MA	CT	Mir Badshah	15	25/04/1963	Tank		24/10/2012	GMS Murtaza	
147	M. Jamshed Akhtar ✓	BA	CT	Nasrullah Jan	15	20/04/1964	Tank		24/10/2012	GMS Waroki	
148	Abdul Hameed ✓	BA	CT	Maz Ullah Khan	15	01/01/1967	Tank		24/10/2012	GMS Wanda Zalo	
149	Ameer Nawaz ✓	MA	CT	Mosam Khan	15	16/03/1967	Tank		24/10/2012	GHS Kot Khadak	
150	Qaisar Khan ✓	MA	CT	Ghulam Jan	15	03/03/1968	Tank		24/10/2012	GMS Adda Umer	
151	Farman Ullah ✓	BA	CT	Abdul Hameed Khan	15	07/03/1968	Tank		24/10/2012	GMS Kot Azam	
152	Farhat Ullah ✓	MA	B.Ed CT	Inayat Ullah Khan	15	20/07/1968	Tank	22/10/1992	24/10/2012	GHS Gara Budha	
153	Ghulam Mustafa ✓	MA	CT	Murtaza	15	02/10/1968	Tank		24/10/2012	GMS Norang	
154	Javed Khan ✓	BA	CT	Aziz Khan	15	02/11/1969	Tank		24/10/2012	GMS Sheikh Sultan	
155	Abdul Hameed ✓	BA	CT	Inayat Ullah Khan	15	14/03/1970	Tank		24/10/2012	GHS Bazai	
156	Maqbool Hussain ✓	MA	CT	Ghulam Sarwar	15	01/05/1972	Tank		24/10/2012	GHS No. 2. Tank	

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Account
Over

S.No	Name of Teacher	Acad:	Prof:	Father, s Name	BPS	Date of Birth	Dom:	Date of 1st entry in Govt: Service	Date of Apptt: in the present post	Place of Posting	Remarks
157	Muhammad Sohail ✓	MA	CT	Muhammad Akram	15	01/06/1972	Tank		24/10/2012	GMS Chesan kuch	
158	Riaz Ahmad ✓	MA	CT	Muhammad Ishaq	15	10/09/1972	Tank		24/10/2012	GHS Kirri Marwati	
159	Abdul Qadir ✓	MA	CT	Haji Baqi Billah	15	01/12/1972	Tank		24/10/2012	GHS Kot Hakeem	
160	Zulfaqar Ali shah ✓	MA	CT	Abdul Sattar Ali shah	15	01/01/1974	Tank		24/10/2012	GMS Bara khel	
161	Sohil Karim ✓	MA	CT	Karim Bakhsh	15	20/03/1974	Tank		24/10/2012	GMS Waroki	
162	Aziz Ullah ✓	MA	CT	Khushtab Khan	15	21/09/1981	Tank		24/10/2012	GHS Kot Hakeem	
163	Ajab Khan ✓	MA	CT	Amir Khan	15	15/01/1982	Tank		24/10/2012	GHS Pai	
164	Habib Ullah Khan ✓	MA	CT	Hameed Ullah	15	03/04/1984	Tank	24/10/2012	24/10/2012	GHS Maghzai	
165	Salah ud Din ✓	MA	CT	Tehsil khan	15	06/09/1985	Tank		24/10/2012	GMS Chesan kuch	
166	Muhammad Saleem ✓	MA	CT	Siraj ud Din	15	18/04/1987	Tank	1/12/2012	24/10/2012	GMS Sabir Abad	
167	Alam Mansoor ✓	MA	CT	Abdul Basir	15	01/02/1988	Tank	24/10/2012	24/10/2012	GHS Kot Hakeem	
168	Malik Arshed Pervaiz ✓	MSC	CT	Malik Ashraf Gul	15	05/08/1988	Tank	24/10/2012	24/10/2012	GCMHS No.1 Tank	

Prepared by _____
Ahmad Nawaz S/Clerk

Checked by _____
Mir Azam Asstt:

Executive District Officer
Elem: & Secy: Edu: Tank

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17/12/2012
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s/list prepared according to the
Taking over charge and age accordingly.
17/12/2012


20	88	Muhammad Hashim	GHS Gomal. Bazar	GHS Gomal. Bazar	A/V/Post
21	89	Muhammad Rafiq	GHS Sheikh Uttar	GHS Sheikh Uttar	A/V/Post

Adjustments

S.No	Name of Teacher	Present Place of Posting	Posted at	Remarks
1	Akbar Zaman SCT	GHS Gara Baloch	GHS Ranwal	A/V/Post
2	Zahoor Hussain CT	GMS Tank Cantt	GHS Ranwal	A/V/Post

Terms and conditions:-

- 1 S.No.1 to S.No.21 will be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be preceded under the rules framed from time to time.
- 4 They are posted "School based" & their services are non-transferable.
- 5 Charge report should be submitted to all concerned.
- 6 Their Inter-Se- seniority on lower post will remain intact.
- 7 No TA/DA is allowed for joining his duty.
- 8 They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.
- 9 Suspension orders issued vide this office No.10134-38 dated 24-11-2014 is hereby with drawn with immediate effect.


District Education Officer (Male)
Tank

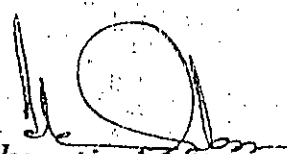
Endst: No. 10197-10202 / DEO(M)

th 28 / 11 / 14

Copy forwarded for information and necessary action to the:-

1. The Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. The Dy: District Education Officers (M) Tank.
3. The District Accounts Officer Tank.
4. The Principals/Headmasters Concerned.
5. Teachers Concerned.
6. PA File.




District Education Officer (Male)
Tank

To

JPE/DN

20/11/14

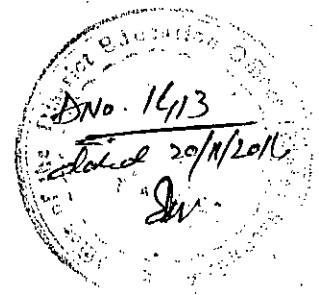
The Honourable District Education Officer (M), TANK.

Sub: An application for Grant of Seniority Right of CT Teacher at District TANK.

R/s, with great respect I want to bring your kind notice towards this matter that I have been serving as a CT Teacher in Education Department w.e.f. 01-02-90 till today. my first appointment date is 27-01-1990 and I took charge at SHS KHIRGI F.R. TANK on 01-02-1990. My transfer from F.R. TANK to District TANK is 28-11-2001 and I took charge at SHS Maghza on 01-12-2001 kindly grant me Seniority Right of CT Teachers. Because my Appointment fellows have become 851(2). I shall be thankful to you.

Date: 20-11-2014.

Yours obediently,
MOHAMMED ZAMAN
CT SHS Maghza



Mr. Duv

To,

The Secretary Education,
Peshawar (K.P.K.)

Sir,

subject: Grant of seniority right of S.S.T (G)

With great respect I want to bring your kind notice towards this matter that I have been serving as ET teacher in education department w.e.f (01-02-1990) till today. My first appointment date is 27-01-1990 and I took charge at GHS Khirgi, F.R. Tank on 01-02-1990, my transfer date from F.R. Tank to district Tank is 28-11-2001 and I took charge at GHS Maghrai on 01-12-2001. Kindly grant me Seniority right of S.S.T (G).

Your's obediently;

Muhammad Zaman

C.T G.H.S Maghrai

Distt: Tank

03-12-2014

~~03-12-2014~~

Muhammad Zaman

M



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) TANK

Set 1999

Annex - D1

24

OFFICE ORDER:-

The substitute of this Office Order No. 10064-69 dated 18-11-2014, the competent authority is pleased to reconstitute the above mentioned order on acceptance of appeals & correction in Seniority lists and upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Male CTs B-15 are hereby promoted to the post of Senior CT BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and they are being posted in GHSS/GHS as mentioned against each.

S.No	S.No	Name of Teacher	Previous Place of Posting	Posted at	Remarks
1	69	Azad Khan	GHS Gul Imam	GHS Gul Imam	A/V/Post
2	70	Hidayat Ullah	GHS Kaka Khel	GHS Kaka Khel	A/V/Post
3	71	Muhammad Razaq	GHS Mulazai	GHS Mulazai	A/V/Post
4	72	Saif Ur-Rehman	GHS Pai	GHS Pai	A/V/Post
5	73	Murtaza Khan	GMS Wado Zelo	GHS Akbari	A/V/Post
6	74	Habib Khan	GMS Kot Nawaz	GHS Kot Khadak	A/V/Post
7	75	Qismat Ali Khan	GHS Gara Baloch	GHS Gara Baloch	A/V/Post
8	76	Abu Suleman	GHS K Khadak	GHS K Khadak	A/V/Post
9	77	Shafqat Ullah	GMS Nourang	GHS Maghzai	A/V/Post
10	78	Zahir Shah	GHS M.Akbar	GHS M.Akbar	A/V/Post
11	79	Muliammad Riaz	GHS Pai	GHS Pai	A/V/Post
12	80	Aziz Ullah	GCMHS No.1.Tank	GCMHS No.1.Tank	A/V/Post
13	81	Syed Zahoor Shah	GHS Tatoor	GHS Gara Baloch	A/V/Post
14	82	Illahi Bakhsh	GMS Kot Kat	GCMHS No.1 Tank	A/V/Post
15	83	Saif Ullah Jan	GHS Darraki	GHS Darraki	A/V/Post
16	84	Muhammad Ayub	GHS No.3 Tank	GHS No.3 Tank	A/V/Post
17	85	Akbar Ali	GHS Kaka Khel	GHS Kaka Khel	A/V/Post
18	86	Ali Gohar	GHS Umar Khel	GHS Umar Khel	A/V/Post
19	87	Sana Ullah	GCMHS No.1.Tank	GCMHS No.1.Tank	A/V/Post

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محمد زمان

2015ء منجانب

11.5.2015

مورخہ

بنام
Govt. of KPK
Others

Service Appeal

مقدمہ

دعویٰ

جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی
اور منسوخی نیز دائر کرانے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت
مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے
اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے
سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں
گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھدیا کہ سندر ہے۔

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2015

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ماہ

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المرقوم

محمد زمان مل آن ان اللہ
(Handwritten signature)

العبد گواہ العبد

کے لئے منظور ہے۔

لپٹسار

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

S.A. No. 501/2015
Muhammad Zaman

(Appellant)

Versus

Govt. Of Khyber Pakhtunkhwa through Secy:
Secondary Education Pakhtunkhwa Peshawar

(Respondents)

**PARAWISE REPLY ON BEHALF OF
RESPONDENTS NO. 1,2 ,3&4**

RESPECTFULLY SHEWTH

Respondents humbly submit as under:-

PRELIMINARY OBJECTIONS

1. That the appeal is badly time barred.
2. That the appeal is not maintainable and incompetent in the eyes of law in its present form.
3. That the appellant is estopped by his own conduct to file this appeal.
4. That the appellant has got no cause of action and locus standi to submit this appeal.
5. That the appellant has not come to the Tribunal with clean hands and suppressed relevant facts .
6. That the appeal is bad on account of misjoinder / non-joinder of necessary parties.
7. That the appellant has concealed the material facts from Honourable Tribunal.
8. That the Honorable Service Tribunal has no jurisdiction to entertain the instant appeal in present form.

BRIEF FACTS

1. This Para is pertained to record, hence no comments.
2. This Para is also pertained to record, however that the appellant was transfer on his own request form GHS Khirgi FR Tank to GHS Maghzai District Tank with the following terms and conditions. Which is quite clear Seniority may be determined at the bottom of the seniority list of District.
3. The Para also relates to record, hence no comments.
4. Incorrect/Not admitted. That the respondents No.3 issued combined seniority list wherein the appellant was placed at S.No. 105 but the said seniority list prepared & issued by competent authority i.e District Education Officer Male Tank (respondent No.4).
5. This Para is correct to the extent that respondent No. 3 issued up gradation order on acceptance of appeal and necessary correction in seniority list thereafter upon the


recommendation of departmental promotion committee, the private respondents were promoted from BPS-15 to BPS-16.

6. That the departmental appeal was examined, considered & filed by appellant authority.
7. Incorrect, the appellant has got no cause of action and locus standi.

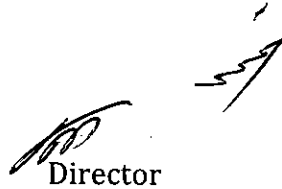
OBJECTIONS ON GROUNDS:

- A. Incorrect / Not admitted. The respondent No. 3 follow the seniority list of CT Teacher which is issued by the respondent No.4. The respondent No.4 is competent authority to prepare and issue the seniority of District cadre employees.
- B. In correct the respondent No.4 prepare and issued the said seniority list as per law/rules and regulations & existing policy.
- C. Correct to the extent that the length of service and date of 1st Appointment of the appellant has not been considered. The service of the appellant was consider from the date of taking over charge at the present post of CT in District Tank in the said seniority list according to the rules and regulations.
- D. Already mentioned in above para.
- E. Incorrect the whole procedure was conducted as per law. The appellant is most junior from the private respondent No. 6 to 20 in the light of seniority list. The private respondent No.6 to 20.They were promoted from BPS-15 to BPS-16 under the existing rules & regulations.
- F. In Correct vehemently denied. The promotion were notified after complying with legal and codel formalities as per law and existing policies.

Hence it is humbly prayed that on acceptance of this parawise reply the instant appeal of the appellant may graciously be dismissed with cost.

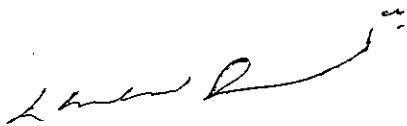


Secretary
E&SE Deptt:
Khyber Pakhtunkhwa Peshawar
Respondent No. 1 & 2



Director
E&SE Deptt:
Khyber Pakhtunkhwa Peshawar
Respondent No. 3

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar



District Education Officer (Male) Tank
Respondent No. 4

District Education Officer (M)
Tank

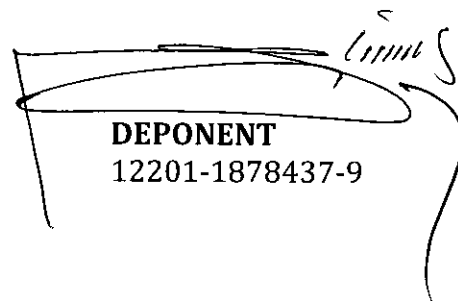
**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
D.IKHAN BENCH**

Service Appeal No. 501/2015

Muhammad Zaman VS Government of Khyber Pakhtunkhwa and others

AFFIDAVIT

I Mr. Abdus Saleem Khan Headmaster BPS-17 Incharge Litigation o/o District Education Officer (Male) Tank do hereby solemnly affirm and declared on the oath that the Para wise comments are true and correct to the best of my knowledge and belief that nothing has been concealed from this Honourable Court.


DEPONENT
12201-1878437-9

IDENTIFIED BY:

AUTHORITY LETTER

Mr. Abdus Saleem Khan Headmaster BPS-17 Incharge Litigation o/o District Education Officer (Male) is hereby authorized to attend the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar Bench D.I.Khan S.A. No. 501/2015 titled as "Muhammad Zaman Vs Govt. of Khyber Pakhtunkhwa & others" on behalf of respondent No. 2, 3 & 4.


District Education Officer
(Male) Tank

District Education Officer (M)
Tank

I

**BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR CAMP AT DIKHAN**

Service Appeal No. 501/2015

Muhammad Zaman

V/S

Govt: of KPK & others

REPLY ON BEHALF OF RESPONDENTS NO. 6 to 8, 11 to 14 and 16 to 20.

Respected Sir,

Preliminary Objections:

1. That this honourable tribunal has no jurisdiction to entertain the appeal of appellant for grant of promotion.
2. That the appellant has no cause of action.
3. That the appeal is hopelessly Time barred.
4. That the representation / departmental appeal filed by the appellant is time barred, therefore the present appeal is also incompetent *and Time barred.*
5. That the appellant is stopped by his own conduct to file this appeal.
6. That the Appeal is not maintainable in its present form as the appellant has not sought departmental remedies / representation, before filing this appeal as provided under the law.
7. That the appellant has not challenged the final seniority list dated: 17-12-2012 with in time, therefore, the appeal in hand is not maintainable.

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8. That the appellant impugned the order of promotion of private respondents but promotion is not term and condition of service and as such no representation lies against the order of promotion and thus the subject matter of appeal is barred under section 4 (b) KPK service tribunal act 974.

9. That the appeal is bad on account of mis-joinder of cause of action.

10. That the appellant has not come to this court with clean hands.

Reply on Facts:

1. That this Para needs No Reply.

2. That this Para pertains to record.

3. That this para is correct to the extent of preparation of seniority list on 11-07-2012 which has not been challenged by the appellant within the prescribed period of limitation of 30 days and has thus attained finality.

4. That this para is also correct to the extent of issuance of notification dated: 25-11-2014 which has not been challenged by the appellant with in time.

5. That this Para is incorrect and baseless, the appellant has not challenged the order of issuance of seniority list as well as order of promotion with in time and thus the appeal is badly time barred.

Jan 2

6. That this Para is incorrect and misconceived. The order dated: 25-11-2014 has neither been challenged by the appellant with in time nor representation lies against the order of promotion as provided under section 22 of Khyber Pakhtunkhwa Civil Servants Act 1973.

On Grounds:-

- a. That this Para is incorrect and baseless, the appeal of the appellant is not maintainable and is hopelessly time barred as the appellant has challenged the seniority list dated: 17-12-2012 as well as order of promotion dated: 25-11-2014.
- b. That this Para is also incorrect and baseless, the impugned seniority list has not been challenged by the appellant with in time and the matter is of a close chapter of the year 2015.
- c. That this para incorrect and misconceived, the appellant has been given a due place of seniority in the seniority list.
- d. That this para is incorrect and baseless, this honourable tribunal has not power to pass an order of promotion in favour of appellant.
- e. That this para is also incorrect and misconceived.
- f. That this para is incorrect and baseless. The appellant has two orders i.e. dated: 11-07-2012 and 25-11-2014

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in one appeal and that too through the time barred appeal which is liable to be rejected / dismissed with costs payable to the answering respondents.

g. That this para needs no reply.

It is therefore humbly prayed that appeal of the appellant may please be dismissed with cost to the paid to the answering respondents as provided under the law.

Dated: 23 / 2 / 2016

Your Humble respondents
Through Special attorney

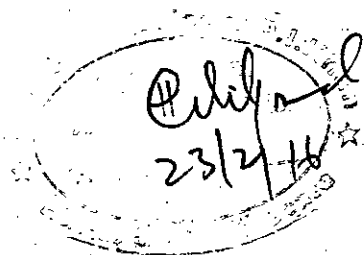
Ali Gohar
Respondent No. 17
Through counsel

Gul Tiaz Khan Marwat
Advocate High Court
DIKhan

AFFIDAVIT

I, Ali Gohar S/o Umar Khan SCT G.H.S Umar Khel Tehsil & District Tank respondent No. 17 for self and as special attorney for rest of the private respondents, Solemnly affirm and declare on oath that content of the reply are true and correct to the best of my knowledge and belief and that nothing has been concealed from this learned tribunal.


Deponent



وکالت نامہ

کورت فیس	قیمت ایک روپیہ
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بعدالت جناب سرور سروسز پرائیویٹ لمیٹڈ دہلی کے نام سے
 منجانب سرور سروسز پرائیویٹ لمیٹڈ دہلی
 بنام حکومت پاکستان کا
 محمد زمان
 دعویٰ یا جرم

14 مارچ 2016ء

تفصیل دعویٰ یا جرم
 سرور سروسز پرائیویٹ
 باعث تحریر آئنگے

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے پیروی و جوابدہی برائے پیشینہ تصفیہ مقدمہ بمقام دہلی کے لیے
 گل نواز خان لبرٹ رائٹرز کے نام سے
 کو حسب ذیل شرط پر قبول کیا گیا ہے، کہ میں ہر قسم کی خود یا بذریعہ اختیار خاص رو برو عدالت حاضر ہونے کا اور ہر وقت پکارے جانے کے مقدمہ وکیل صاحب
 موصوف کو اطلاع دیکر حاضر عدالت کروں گا، اگر پیشی پر منظر حاضر نہ ہوں اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا تو صاحب موصوف
 اسکے کسی طرح ذمہ دار نہ ہوں گے، نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا برو تعطیل پیروی کرنے کے
 ذمہ دار نہ ہوں گے، نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا برو تعطیل پیروی کرنے کے ذمہ دار نہ
 ہوں گے، اور مقدمہ صدر مقام پکھری کے علاوہ اور جگہ سماعت ہونے یا برو تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر منظر کو کوئی نقصان پہنچے تو اس کے ذمہ
 دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا عتقاندہا پس کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پرواختہ صاحب موصوف مثل کردہ
 ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ، یا جواب دعویٰ یا درخواست اجراءے ڈگری و نظر ثانی اپیل گمرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا
 بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر غامشی یا راشی نامہ و فیصلہ بر
 حلف کرنے، اقبال دعویٰ کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مذکورہ میں دان از پکھری صدر مقام پکھری مقدمہ مذکورہ نظر ثانی اپیل و گمرانی و برآمدگی
 مقدمہ یا منسوخی ڈگری یا عطف یا درخواست حکم انتہائی یا ترقی یا گرفتاری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ عتقاندہا پیروی کا اختیار ہوگا
 اور تمام ساختہ پرواختہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو
 کی کاروائی یا بصورت درخواست نظر ثانی اپیل یا گمرانی یا دیگر معاملہ مقدمہ مذکورہ کی دوسرے وکیل یا بیرسٹر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو
 بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جو کچھ ہر جانہ اتواء پڑیگا، وہ صاحب
 موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی
 صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے۔ تاکہ سند رہے
 مورخہ 23 مارچ 2016ء

مضمون وکالت نامہ سن لیا ہے۔ اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

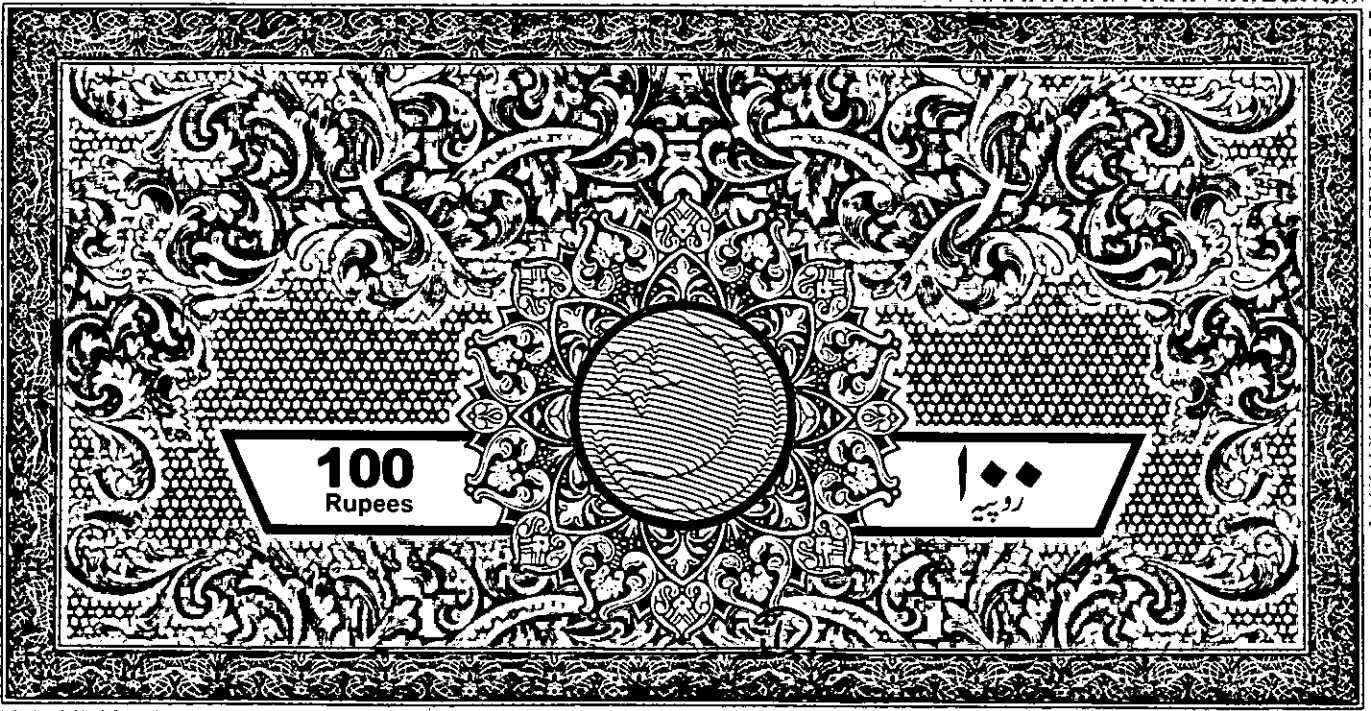
Attested & Accepted

محمد زمان
 23/2/16

علی قاسم

بذریعہ محمد علی قاسم
 دیگر دستخط

محمد علی قاسم
 ضلع پکھری ڈیڑھ اسٹیشن خان



بیت القادسیہ سرحدی سٹیٹ بینک کے لیے KPI لینڈ اور سٹیٹ بینک کے لیے

Handwritten signature and stamp: Muhammad Nisry Public Bank

بیت القادسیہ سرحدی سٹیٹ بینک کے لیے
گورنمنٹ ہاؤس KPI کے لیے
ریسائیڈنٹ
(سرحدی سٹیٹ بینک)

عقار و زمینیں سرحدی سٹیٹ بینک کے لیے

ماہانہ قسٹان آزاد قسٹ در مارچ ۱۹۵۷ء سے ستمبر ۱۹۵۷ء تک
عبداللہ بن عبدالمطلب نے جمع پونجی کی آئی سی ڈی ٹوٹ فڈنگ (۱) شریعت و شریعت
آئی سی ڈی قسٹ جا رسائیڈنٹ (۲) سید پور جا سید قسٹ نوڈ کی آئی سی ڈی ٹوٹ فڈنگ
الہی خبی نے قدرتی آئی سی ڈی ٹوٹ فڈنگ۔ عبداللہ بن عبدالمطلب نے آئی سی ڈی ٹوٹ فڈنگ
ابریعی و لیر نورمال آئی سی ڈی ٹوٹ فڈنگ۔ عبداللہ بن عبدالمطلب نے آئی سی ڈی ٹوٹ فڈنگ
حدود قسٹ آئی سی ڈی ٹوٹ فڈنگ۔ قدرتی سید احمد سید آئی سی ڈی ٹوٹ فڈنگ
سید عبداللہ بن عبدالمطلب نے آئی سی ڈی ٹوٹ فڈنگ

انگریزی میں لکھی گئی ہے کہ عبداللہ بن عبدالمطلب نے
آئی سی ڈی ٹوٹ فڈنگ کے لیے مالدارانہ طور پر سٹیٹ بینک کے
و دیگر جو وفات کے لیے ایسا کیا ہے سید احمد سید اور سید احمد سید

(7-1896626-12201) 12201-901488-1
آزاد خان ندوڑ
شرفقت اللہ ندوڑ
سید ظہور شاہ

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(3-1899401-12201) 12201-1850971-12201-487209-7
عزیز اللہ ندوڑ
آئی سی ڈی ٹوٹ فڈنگ کے لیے

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1988

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WINDOOR

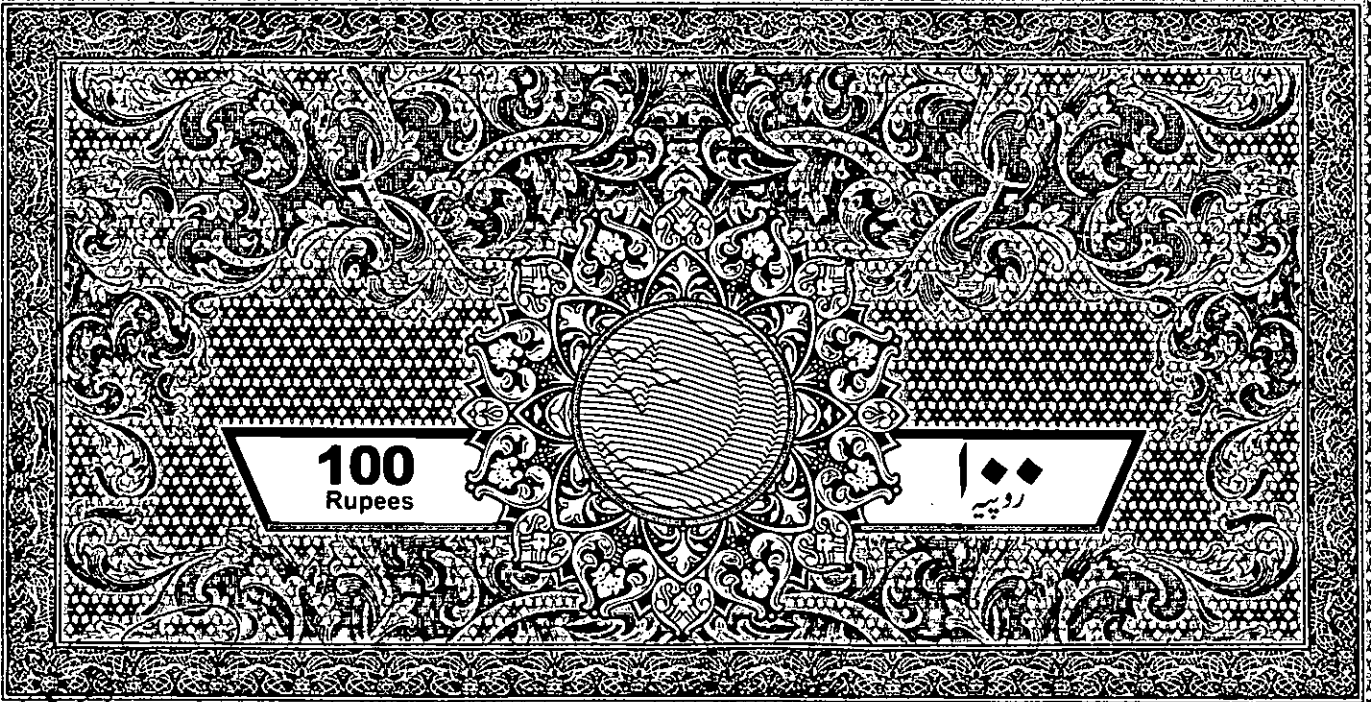
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1988

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WINDOOR

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Rupees

روپیہ

سے ماہر سے اس لئے خوشی خود دینی جانب سے وسیع علی گڑھ
دیہ طرف آج کے لئے اس لئے خود دینی جانب سے وسیع علی گڑھ
اس لئے خود دینی جانب سے وسیع علی گڑھ
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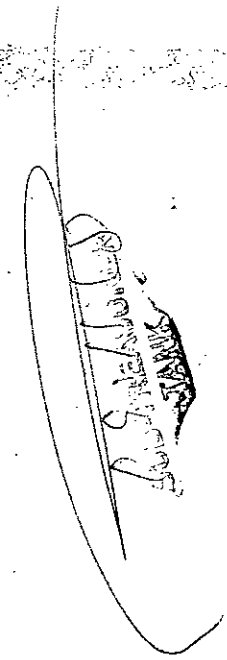
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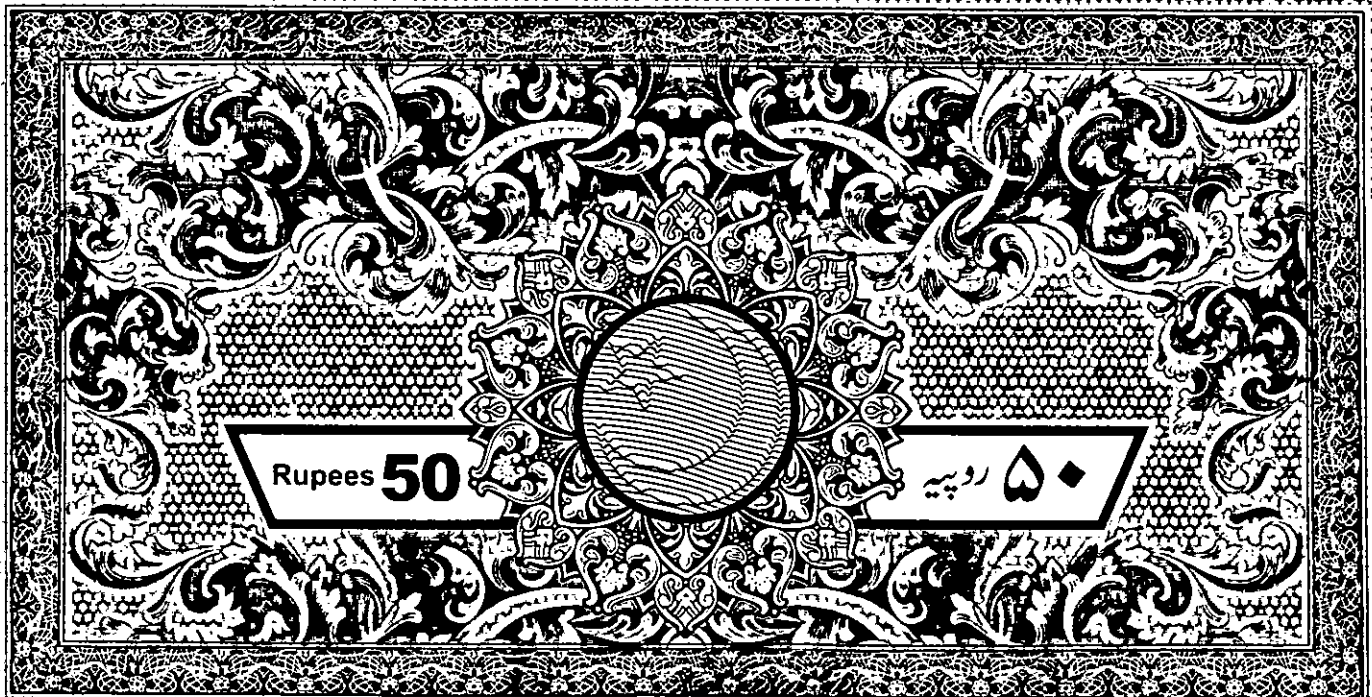
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- 12201-1896626-7
- 12201-1901488
- 12201-6649881-1
- 12201-1885097-1
- 12201-1899401-3
- 12201-2374682-1
- 12201-1894452-3
- 12201-1880760-9

2063
79775

[Handwritten signature]





Rupees 50

۵۰ روپیہ

کامیاب ہو کر ہر روز سے خاص مہم کو جاری
جو مہم کو قابل مہم ہوگی

رحمتِ باری تعالیٰ پر درود

جس پر درود ہے جس پر ہے شکر و تحسین
۱۱/۱۹

12201-6649381-1

1720110005425

12201-1901488-1

12201896626-7

13

سید ظہیر شاہ مدظلہ العالی

12 شفیقت اللہ مدظلہ العالی

17 محمد سلمان مدظلہ العالی

6- آزاد خان مدظلہ العالی

12201-1894452-3

12201-1880760-9

12201-4877209-7

12201-1885097-1

12201-1899401-3

20 محمد رفیق مدظلہ العالی

19 محمد شام مدظلہ العالی

18 شہداء اللہ مدظلہ العالی

16 آئینہ علی مدظلہ العالی

10 عزیز اللہ مدظلہ العالی

Muhammad Ali

17

14 سفی اللہ مدظلہ العالی

12201-2374682-1

14 سفی اللہ مدظلہ العالی

17

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DAMSAZ KHAN
Advocate High Court
bc-11-3182
Date of Issue: 08-04-2015
Valid upto: 07-04-2018



Secretary
KP Bar Council

وکالت نامہ

کورٹ
فیس

17/8/18

اعدالت جناب آغا محمد کرم سر سید مولانا شہزاد شہباز صاحب
محمد زعفران
بنام حکومت پاکستان و غیرہ
پنجاب

دعویٰ یا جرم

تفصیل دعویٰ یا جرم

ادیل
باعث تحریر آنکہ

دعویٰ یا جرم

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے پروردی و جواب دہی پیش با تصفیہ مقدمہ بنام
دعویٰ یا جرم
ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیش پر خود یا بذمہ لایہ رو برصدمات حاضر ہوتا رہوں گا اور ہر وقت پکارے جانے مقدمہ وکیل صاحب
موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیش پر منظر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب
موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ یا کچہری کے اوقات سے پہلے یا چھپے یا بروز تعطیل
پروردی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر کچہری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا کچہری کے اوقات کے آگے یا چھپے پیش ہونے
پر منظر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معارضہ کے ادا کرنے یا سخت نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے مجھ
کو کل ساختہ پر وادخت صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ یا درخواست اجراء اسمائے ذمہ
نظر ثانی اپیل نگرانی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر ماثلی یا راضی نامہ و فیصلہ برصفت کرنے اقبال دعویٰ کا بھی اختیار ہو گا اور بصورت مقرر ہونے
تاریخ پیش مقدمہ مذکور بیرون از کچہری صدر پروردی مقدمہ مرکوز نظر ثانی اپیل و نگرانی و برآمدگی مقدمہ یا منسوخی ذمہ کی طرف یا درخواست حکم امتناعی یا قرقی
یا گرفتاری نقل از فیصلہ اجراء ذمہ کی بھی صاحب موصوف کو بشرط اذانگی علیحدہ مختصم پروردی کا اختیار ہو گا اور تمام ساختہ پر وادخت صاحب موصوف مثل کردہ
از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو کہ مقدمہ مذکورہ یا اس کے کسی جزو کی کاروائی یا بصورت درخواست نظر ثانی
اپیل نگرانی یا دیگر معاملہ و مقدمہ مذکورہ کسی دوسرے وکیل یا ہیر سز کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ویسے
اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا وہ صاحب موصوف کا حق ہو گا مگر
صاحب موصوف کو پوری فیس تاریخ پیش سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پروردی نہ کریں اور ایسی صورت
میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے
مورخہ 17 مارچ 2018
مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

Accepted

محمد زعفران (ایڈیٹر)

Law

(17)

خدمت صاب سروس ٹریبیونل ج ڈھائی خان

عنوان :- درخواست برآمد عطائیت (Seniority Right)

جناب عالی :-
خودشانہ التماس ہے کہ ہم سائلین گوپیر خان اور قزبان کی ترقی
کوڈ نمبر التماس (SC) کو (Promotion)
PNDST No: 1131-36 File
Nos: 2
Promotion / Seniority

order copy
order سے (D) کے نام سے
2017-08-04 کو پورے ہو گئے ہیں۔
درخواست سے لف ہے۔ اور 2017-08-09 کو
سائلین کو (Old Seniority Right) سے (Seniority Right) دیا گیا ہے۔
عین وزارت پر ہے۔

فقط حوالہ:
22-01-2018

الکافی

سائلین :- گوپیر خان، نینڈ، قزبان، بھوگرہ، ڈھائی خان
22-01-2018
22-01-2018



OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) TANK

OFFICE ORDER:

Consequent upon the Promotion order of CT (Male) BPS-15 to Senior CT BPS-16 issued vide Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar Endst:No.1131-36/File No.2/Promotion /Senior SCT B-16 Dated, Peshawar the 04/08/2017.

The following Senior CTs B-16 are hereby Adjusted against the vacant post of Senior CT BPS-16 .

S.No	S.L.No	Name of Official	Previous Place of Posting	Present Place of Posting	Remarks
1.	84	Muhammad Ramzan	GSSCMHS No.1.Tank	GSSCMHS No.1.Tank	A.V.Post
2.	85	Kalim Ullah	GHSS Gul Imam	GHSS Gul Imam	A.V.Post
3.	87	Asmat Ullah	GHSS Gomal Baz	GHSS Gomal Bazar	A.V.Post
4.	88	Muhammad Zaman	GHS Maghzai	GHS Maghzai	A.V.Post
5.	90	Gohar Khan	GMS Cantt Tank	GHS No.3 Tank	A.V.Post

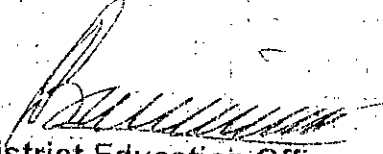
- Note: 1. Terms and Conditions will be the same as prescribed in the above mentioned notification.
2. Charge report should be submitted to all concerned.
3. No TA/DA is allowed to anyone.

-sd-
Bakhtullah Shah
District Education Officer
(Male) Tank

Endst. No. 7587-91 /Promotion SCT-2017 Dated Tank the 09 /08/2017

Copy to the:

1. The Director Elem: Secondary Education Khyber Pakhtunkhwa Peshawar
2. The District Accounts Officer Tank.
3. The Dy: District Officer (Male) Local Office.
4. The Principal/Headmaster Concerned.
5. The Official Concerned.


District Education Officer
(Male) Tank