

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

SERVICE APPEAL NO. 1611/2013

Date of institution ... 11.12.2013

Date of judgment ... 28.11.2016

Qadeem Khan S/o Khan Muhammad,
P.E.T, G.M.S Palosi Atozai, Peshawar.

... (Appellant)

VERSUS

1. District Education Officer (Male), Elementary & Secondary Education, Peshawar.
2. Director of Education, Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. Secretary, Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Peshawar.
4. Tika Khan, PET, GHSS, Adizai, Peshawar.
5. Zahid Aslam, Senior PET, GHS No.3 Peshawar Cantt.

... (Respondents)

APPEAL UNDER SECTION-4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974, AGAINST FINAL SENIORITY LIST DATED 30.12.2012 (PROBABLY) WHEREBY APPELLANT WAS PLACED AT SERIAL NO.80 INSTEAD OF S.NO.77 OVER AND ABOVE THE NAMES OF RESPONDENTS.

Mr. Saadullah Khan Marwat, Advocate.

Mr. Arbab Saif-Ul-Kamal, Advocate

Mr. Ziaullah, Government Pleader

.. For appellant.

.. For respondents.

MR. MUHAMAMD AAMIR NAZIR

MR. ABDUL LATIF

.. MEMBER (JUDICIAL)

.. MEMBER(EXECUTIVE)

JUDGMENT

MUHAMMAD AAMIR NAZIR, MEMBER: Qadeem Khan S/o Khan Muhammad,

P.E.T, G.M.S Palosi Atozai, Peshawar, hereinafter referred to as the appellant, through the instant appeal under section-4 of Khyber Pakhtunkhwa Service Tribunal Act 1974, has impugned final seniority list dated 30.12.2012 vide which the appellant was placed at S.No.80 instead of S.No.77. The departmental appeal filed by the appellant against the impugned seniority list on 17.08.2013 was not responded within the statutory period.

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28.11.16

2. Brief facts of the case giving rise to the instant appeal are that the appellant was appointed as PET (M) on 26.06.1997 on the recommendation of the Departmental Selection Committee. That the name of the appellant was placed at S.No. 6 of the merit list while names of the private respondents No.4 and 5 were placed at S. No. 16 and 21. That the appellant assumed the charge of the post on 07.07.1997 while respondents No. 4 and 5 assumed the charge on 28.06.1997. That on 30.12.2012 respondent No.1 issued seniority list wherein the name of the appellant was placed at S. No. 80 while names of the private respondents No.4 and 5 were placed at S. No. 77 and 79 despite the fact that the appellant was senior in the merit. That the fact that private respondents assumed the charge for few days prior to the appellant cannot make them senior, therefore, the appellant filed departmental appeal but the same was not responded within the statutory period, hence the instant appeal.

3. Learned counsel for the appellant argued before the court that the appellant alongwith others were appointed as PET upon the recommendations of the Departmental Selection Committee vide order dated 26.06.1997. That the appellant was placed at S.No. 6 of the merit list while private respondents No.4 and 5 were placed at S. No. 16 and 21 respectively. That the appellant assumed the charge of the post on 07.07.1997 as the place where the appellant was firstly posted, there was no vacant post of PET, hence on 07.07.1997 corrigendum was issued and the appellant was posted at Govt: High School Sufaid Dairy and the appellant assumed the charge on ^{some day} the day. That private respondents No. 4 and 5 assumed the charge on 28.06.1997, hence in the impugned seniority list they were placed senior to the appellant which is against the law as assumption of charge is not a criteria for fixing seniority, Hence, by accepting the instant appeal the impugned seniority list be rectified.

4. The learned Government Pleader, on the contrary argued before the Tribunal that though the appellant was senior in his original merit list yet private respondent No. 4 and 5 assumed the charge of the post prior to the appellant, therefore, the appellant was rightly placed at S.No. 80. That the instant appeal is devoid of merits, hence be dismissed.

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28.11.16

5. We have heard arguments of learned counsel for the appellant and learned Government Pleader for the respondents and have gone through the record available on file.

6. Perusal of the case file reveals that vide appointment order dated 26.06.1997, the appellant alongwith others were appointed as PET in BPS-09. As per the merit list maintained at that time, the appellant was placed at S.No. 6 whereas private respondents No.4 and 5 were placed at S. No. 16 and 21 respectively. However, in the impugned final seniority list dated 30.12.2012 published by the respondents, the appellant was placed at S. No. 80 whereas private respondents No. 4 and 5 who were below in the original merit list were placed at S. No. 77 and 79. The impugned seniority list has been maintained on the basis of assumption of charge and not on the basis of the original merit at which the appellant and private respondents were appointed which is the violation of Rule-17 of NWFP Civil Servants (Appointment, Promotion and Transfer) Rules 1989. According to Rule-17 of the ibid Rules, the seniority inter se of civil servants (appointed to a service, cadre or post) shall be determined:-

(a) "In the case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission [or as the case may be, the Departmental Selection Committee;] provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a later selection."

Since the impugned seniority list is not in accordance with law and rules on the subject, hence the same be rectified and the appellant be given his due seniority on the basis of the merit maintained at the time of his initial appointment. The appeal in hand is accepted on the above terms. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
28.11.2016


(ABDUL LATIF)
MEMBER

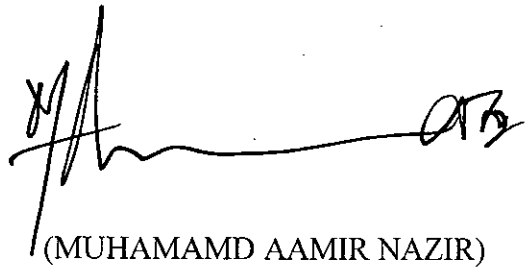

(MUHAMMAD AAMIR NAZIR)
MEMBER

28.11.2016

Counsel for the appellant and Mr. Ziaullah, GP for official respondents No.1 to 3 present. None present on behalf of private respondent No.4, hence proceeded ex-parte.

Vide our detailed judgment of today consists of three pages placed on file, since the impugned seniority list is not in accordance with law and rules on the subject, hence the same be rectified and the appellant be given his due seniority on the basis of the merit maintained at the time of his initial appointment. The appeal in hand is accepted on the above terms. Parties are left to bear their own costs. File be consigned to the record.

Announced
28.11.2016



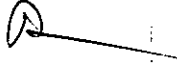
(MUHAMAMD AAMIR NAZIR)
MEMBER



(ABDUL LATIF)
MEMBER

21.12.2015

Counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Rejoinder submitted. To come up for arguments on 20.5.2016.



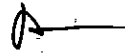
Member



Member

20.5.2016

Counsel for the appellant and Mr. Usman Ghani, GP for respondents present. Counsel for the appellant requested for adjournment. Adjourned for arguments on 14.10.2016.



Member



Member

14.10.2016

Appellant with counsel and Mr. Hameed-ur-Rehman, AD (lit.) alongwith Mr. Kabirullah Khan Khattak, Assistant AG for respondents present. Learned counsel for the appellant requested for adjournment. Request accepted. To come up for arguments on 23-11-16 before D.B.



(ABDUL LATIF)
MEMBER



(PIR BAKHS SHAH)
MEMBER

14.
20.05.2015

Appellant with counsel and Mr. Abdul Karim, ADO alongwith Asstt: AG for the respondents present. Muhammad Bashir, Advocate and Mr. Atif Israr, Advocate also present and filed Wakalat Nama on behalf of private respondent No.4. Representatives of the respondents requested for time to submit written reply/comments. To come up for written reply/comments on 24.06.2015 before S.B.


Member

15 24.06.2015

Appellant in person, Addl: A.G for official respondents No. 1 to 3 and agent of counsel for private respondent No. 4 present. Written reply on behalf of official respondents No. 1 to 3 submitted while adjournment was solicited for private respondent No.4. Notice to private respondent No. 5 be issued for submission of written reply by both the private respondents on 26.8.2015 before S.B.


Chairman

26.08.2015

Counsel for the appellant, M/S Javed Ahmed, Supdt. and Khurshid Khan, SO alongwith Addl: A.G for official respondents No. 1 to 3 and private respondent No. 4 in person present. Private respondent No. 5 is not in attendance despite issuance of notice. Proceeded ex-parte. Written statement by private respondent No. 4 submitted while official respondents have already submitted written reply. The appeal is assigned to D.B for rejoinder and final hearing for 21.12.2015.


Chairman

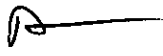
Appeal No. 1611/2013
Mr. Gulshan Khan.

25.02.2015

Counsel for the appellant and Asst: AG for the respondents present. Preliminary arguments heard and case file perused.

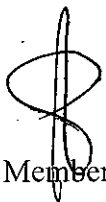
Through the instant appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, the appellant has impugned final Seniority List dated 30.12.2013, vide which the appellant was placed at S.No. 80 instead of S.No. 77 over and above the names of respondents. Against the above referred impugned final seniority list, appellant filed departmental appeal on 16.08.2013, which was not responded within the statutory period and hence the instant appeal on 11.12.2013.


Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notices be issued to the respondents. To come up for written reply/comments on 21.04.2015.


Member

21.04.2015

Appellant in person, Mr. Khurshid Khan, SO for official respondent No.3 and private respondent No.4 in person alongwith Asstt: AG for the respondents present. Representatives of the respondents requested for time to submit written reply/comments. To come up for written reply/comments on 20.05.2015 before S.B.


Member

12
appellant deposited fees
see p. 10


13.

10
31.10.2014

Appellant alongwith his counsel and Mr. Kabirullah, Asst: AG for the respondents present. Representatives of the respondents are not present. The learned AAG requested for time to contact the respondents for submission of complete record of the appellant. Last chance is given to the respondents for production of complete record. To come up for preliminary hearing on 29.12.2014.


Member

11
Reader Note:

29.12.2014

No one is present on behalf of the appellant. Mr. Kabirullah Khattak, Asst: Advocate General for the respondents present. Since the Tribunal is incomplete, therefore, case is adjourned to 25.02.2015 for the same.


Reader



6.

08.07.2014

Appellant in person present and requested for adjournment. Request accepted. To come up for preliminary hearing on 09.07.2014.

Member

7.

09.07.2014

Counsel for the appellant and Mr. Ziaullah, GP for the respondents present. Counsel for the appellant requested for adjournment. Request accepted. To come up for preliminary hearing on 17.09.2014.

Member

8.

17.09.2014

Counsel for the appellant and Mr. Kabirullah Khattak, Assistant Advocate General for the respondents present. Counsel for the appellant requested for adjournment. Request accepted. To come up for preliminary hearing on 29.10.2014.

Member

9.

29.10.2014

Appellant in person and Mr. Kabirullah Khattak, Asst. AG for the respondents present. Appellant requested for adjournment due to general strike of the Bar. To come up for preliminary hearing on 05.11.2014.

Member

3.

14.02.2014

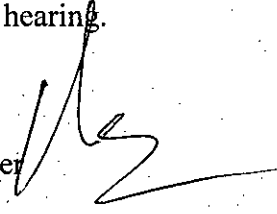
Appellant in person present and requested for adjournment due to non-availability of his counsel. To come up for preliminary hearing on 25.03.2014.


Member

4.

25.03.2014


Appellant with counsel present. Preliminary arguments partly heard. Since the question of limitation is involved, therefore, Pre-admission notice be issued to the learned GP to assist the Tribunal Case is adjourned to 19.05.20014 for preliminary hearing.

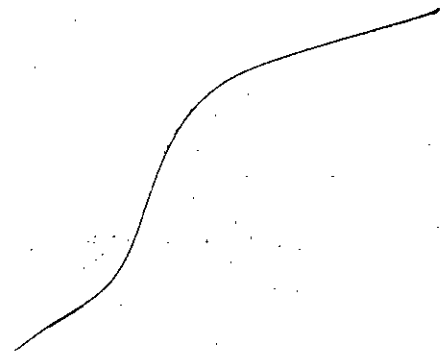
Member 

5.

19.05.2014

Counsel for the appellant and Mr. Ziaullah, GP for the respondents present. Preliminary arguments to some extent heard. The learned counsel for the appellant requested for adjournment. To come up for further preliminary hearing on 08.07.2014.




Member



Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1611/2013


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	16/12/2013	<p>The appeal of Mr. Qadeem Khan resubmitted today by Mr. Saadullah Khan Marwat Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	19-12-2013	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>14-2-2014</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Abdul Majeed son of Sheraz Gul received today i.e. on 11.12.2013 is incomplete on the following scores which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Memorandum of appeal is not signed by the counsel.
2. Law under which appeal is filed is not mentioned.

No. 1767 /S.T,

Dt. 11/12 /2013.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Saadullah Khan Marwat Adv. Pesh.

Sir
Resubmitted after completion

ky

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

S.A No. 1611 /2013

Qadeem Khan Versus D.E.O & others

I N D E X

S.#	Description of Documents	Annex	Page
1.	Memo of Appeal		1-4
2.	Seniority Criteria / Rules 1989	"A"	5-7
3.	Appointment Order, 26.06.1997	"B"	8-10
4.	Charge Assumption, 05.07.1997	"C"	11
5.	Corrigendum, 07.07.1997	"D"	12
6.	Seniority List, 30.12.2012	"E"	13-18
7.	Representation, 17.08.2013	"F"	19
8.	Application for Seniority, 05.12.2013	"G"	20


Appellant:

Through



Dated: 11.11.2013

(Saadullah Khan Marwat)
Advocate
21-A Nasir Mension,
Shoba Bazar, Peshawar.
Ph: 0300-5872676

1

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

S.A No. 1611 /2013

Qadeem Khan S/o Khan Muhammad,
P.E.T, G.M.S, Palosi Atozai, Peshawar. Appellant

Versus

North West Frontier Province
Service Tribunal
Case No. 1637
11-12-13

1. District Education Officer (Male),
Elementary & Secondary Education,
Peshawar.
2. Director of Education, Directorate of
Elementary & Secondary Education,
KPK, Peshawar.
3. Secretary, Government of KPK,
Elementary & Secondary Education
Department, Peshawar.
4. Tika Khan, PET, GHSS, Adizai, Peshawar. ✓
5. Zahid Aslam, Senior PET, GHS No. 3
Peshawar Cantt. Respondents

⇔<=>⇔<=>⇔<=>⇔<=>⇔
U/S 4 of the ST Act, 1974

APPEAL/AGAINST FINAL SENIORITY LIST
DATED 30.12.2012 (PROBABLY) WHEREBY
APPELLANT WAS PLACED AT SERIAL NO. 80
INSTEAD OF SERIAL NO. 77 OVER AND
ABOVE THE NAMES OF RESPONDENTS.

⇔<=>⇔<=>⇔<=>⇔<=>⇔

re-submitted to ~~reg~~
and filed.

Le Sul
7/16/12/13
Registered

Respectfully Sheweth:

1. That in the North West Frontier Province, Civil Servants
(Appointment, Promotion and Transfer) Rules, 1989

method of seniority was enumerated wherein as per rules No. 17, seniority is to be determined:

"17. Seniority:- 1. The seniority inter se of civil servants appointed to as service, cadre or post shall be determined:-

(a) in the case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission or as the case may be, by the Departmental Selection Committee; provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a later selection;

(b) in the case of civil servants appointed otherwise, ---
---- as in the lower post.

Explanation-I:- If a junior person in a lower post is promoted to a higher post temporarily in public interest, even though continuing later permanently higher---- in the higher post;

Explanation-II:- If a junior person---- or demerit.

Explanation-III:- A junior person---- senior person; etc.

(Copy as annex "A")

2. That on 26.06.1997, order on the recommendation of Departmental Selection Committee was issued wherein appellant along with others was appointed as P.E.T (Male) by the authority and his name was placed at Serial No. 06 of the merit list while the names of respondent No. 4-5 were placed at Serial No. 16 & 21. Appellant secured 55 marks while respondent No. 4 & 5 secured 43 and 39 respectively. Thus he was most senior in the merit list, however, appellant assumed the charge of the assignment on 07.07.1997 while respondent No. 4 and 5 on 28.06.1997. The reason was

that appellant was living in village Mathra New Charsadda, while respondent No. 4 & 5 were at Peshawar. (Copy as annex "B")

3. That on 05.07.1997, appellant assumed the charge of the said assignment but no vacant post of PET was available in the school, so he was not allowed to assume the charge. (Copy as annex "C")
4. That on 07.07.1997, Corrigendum was issued and appellant was directed to assume the charge at Govt: High School, Safaid Dairy, Peshawar instead of G.H.S, Police Colony, Peshawar. (Copy as annex "D")
5. That on 30.12.2012, respondent No. 1 issued seniority list wherein the name of appellant was placed at serial No. 80 while that of respondent No. 4 & 5 at Serial No. 77 & 79, despite the fact that in the merit list, appellant was placed at Serial No. 6 while respondent No. 4 & 5 were placed at Serial No. 21 & 23. (Copy as annex "E")
6. That after the receipt of the said seniority list, appellant submitted representation before the respondent No. 1 on 17.08.2013 for correction of the said seniority list but without any response. (Copy as annex "F")
7. That on 05.12.2013, appellant submitted application for supply of the impugned seniority list along with covering letter with dates but without any response. (Copy as annex "G")



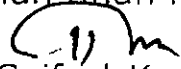
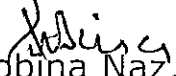
Hence this appeal, inter alia, on the following grounds:-

GROUND S:

- a. That in the rules regarding seniority, merit is the decisive factor but respondent did not take into consideration the merit position.

- b. That in the order of appointment dated 26.06.1997, the name of appellant was placed at Serial No. 06 as per merit while the name of respondent No 4 & 5 were placed at Serial No. 21 & 23, thus appellant was in better position than respondent No. 4 & 5.
- c. That the determining factor of seniority is merit and not the date of taking over the charge of the assignment.
- d. That appellant hails from Shabqadar, Charsadda while respondent No. 4 & 5 from Peshawar, so received the order of appointment at Shabqadar Charsadda after 4 / 5 days, i.e. late.
- e. That the seniority position was not finalized between appellant and respondent No 4 & 5 when respondent No. 1 promoted respondent No. 5 to B-16 as Senior P.E.T which is against the judgments of the apex court.
- f. That finalization of the seniority position between the parties and promotion of respondent No. 5 was based on favoritism and is also illegal, unjust and malafide.

It is, therefore, most humbly prayed that on acceptance of the appeal, the impugned seniority list dated 31.12.2012 (probably), or as the case may be, of respondent No. 1 be set aside with further direction to the authority to 1st finalize the seniority position and thereafter promotion be made as per seniority rules, with such other relief as may be deemed proper and just in circumstances of the case.


 Appellant
 Through  Khan
 Saadullah Khan Marwat

 Arbab Saif-ul-Kamal
 & 
 Miss Robina Naz,
 Advocates,

Dated: 11.12.2013

A

Statutory provision regarding Appointment.

Section 5 of Civil Servants Act, 1973 - Appointment to a civil service of the Province or to a civil post in connection with the affairs of the Province shall be made in the prescribed manner by the Governor or by a person authorised by the Governor in that behalf.

THE NORTH-WEST FRONTIER PROVINCE
CIVIL SERVANTS (APPOINTMENT, PROMOTION &
TRANSFER) RULES, 1989.

PART-I

GENERAL

1. **Short title and commencement:** - (1) These rules may be called the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.
(2) They shall come into force at once.
2. **Definitions:-**(1) In these rules, unless the context otherwise requires:-
 - (a) "Appointing Authority" in relation to a post, means the persons authorized under rule 4 to make appointment to that post;
 - (b) "Basic Pay Scale" means the Basic Pay Scale for the time being sanctioned by Government, in which a post or a group of posts is placed;
 - (c) "Commission" means the North West Frontier Province Public Service Commission;
 - ²⁹(d) "Departmental Promotion Committee" means a committee constituted for making selection for promotion or transfer to such posts under a Department, or offices of Government, which do not fall within the purview of the Provincial Selection Board;
 - ³⁰(dd) "Departmental Selection Board" means a Board constituted for the purpose of making selection for initial recruitment /appointment to posts under a Department or office of Government in Basic Pay Scale 17 not falling within the purview of the Commission:
Provided that more than one such committees may be constituted for civil servants holding different scales of pay".
 - (e) "Departmental Selection Committee" means a committee constituted for the purpose of making selection for initial appointment to posts under a department, or office of Government [in Basic Pay Scale 17 and below not falling within the purview of the Commission];
 - (f) "Post" means a post sanctioned in connection with the affairs of the Province, but not allocated to all Pakistan Unified Grades ; and
 - ³¹(g) "Provincial Selection Board" means the Board constituted by Government for the purpose of selection of civil servants for promotion or transfer to posts in respect

²⁹ Substituted by Clause (d) of sub-rule (1) of Rule 2 vide Notification No. SOR-I (S&GAD) 4-1/80 (Vol-II) dated 14-01-92.

³⁰ Clause (dd) added by Notification No. SOR-III (S&GAD) 2-7/86, dated 8-12-1994

³¹ Clause (g) substituted by Notification No. SOR-I(S&GAD) 4-1/80/II, dated 14-01-1992.

PART-V

PROBATION AND CONFIRMATION

⁵⁴15. Probation. ----- (1) Persons appointed to posts by initial recruitment, promotion or transfer shall be on probation for a period of one year.

(2) The appointing authority, if considers necessary, may extend the probation period for one year as may be specified at the time of appointment.

(3) On the successful completion of probation period, the appointing authority shall, by specific order, terminate the probation:

Provided that if no specific order is issued on the expiry of the first year of probation period, the period of probation shall be deemed to have been extended under sub-rule (2):

Provided further that if no specific order is issued on the expiry of the extended period of probation, the period of probation shall be deemed to have been successfully completed.

16. Confirmation:-After satisfactory completion of the probationary period, a civil servant shall be confirmed; provided that he holds a substantive post, provided further that a civil servant shall not be deemed to have satisfactorily completed his period of probation, if he has failed to pass an examination, test or course or has failed to complete successfully a training prescribed within the meaning of sub-section (3) of Section 6 of the North West Frontier Province Civil Servants Act, 1973.

PART-VI

SENIORITY

17. Seniority :- (1) the seniority inter se of civil servants ⁵⁵(appointed to a service, cadre or post) shall be determined:-

(a) in the case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission ⁵⁶[or as the case may be, the Departmental Selection Committee;] provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a later selection; and

(b) in the case of civil servants appointed otherwise, with reference to the date of their continuous regular appointment in the post; provided that civil servants selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter se seniority as in the lower post.

Explanation-I:- If a junior person in a lower post is promoted to a higher post temporarily in the public interest, even though continuing later permanently in the higher

⁵⁴ Rule-15 substituted vide Notification No. SOR-VI/E&AD/1-3/2009/Vol-VIII dated 16-2-2010.

⁵⁵ Substituted for the words appointment to a post in the same basic pay scale in a cadre by Notification No. SOR-I(S&GAD)4-1/80, dated 17-05-1989.

⁵⁶ The words inserted by Notification No. SOR-I(S&GAD)4-1/80/II, dated 04-02-1996.

Attested
Dad J

(B)

8

Phone No. 20001
OF THE DIVL: DIRECTOR OF EDUCATION(S) PESHAWAR DIVISION PESHAWAR.

APPOINTMENTS/

Consequent upon their Selection by the Departmental Selection Committee, the Divl; Director of Education(S) Peshawar has been pleased to appoint the following ^{UP} trained PET (M) at the school noted against their names in BPS-(9) Fixed plus usual allowances as admissible under the rules with immediate effect subject to the following existing terms and conditions:

S/No;	Name & Address	D/O Birth	Merit List	School	Remarks.
1.	Mohammad Salih S/O M. Yousaf Vill; Potwar Bala Peshawar.	15.11.75.	24/82		GMS, Firbala, already occupied by him.
2.	Muzayyan Tan S/O Abdul Aziz Vill; Hassanzaib Charsadda.	20.1.61.	25/79		GMS, Mian Killi already post occupied by him.
3.	Adnan S/O Mohibullah Vill; Rajjar Charsadda.	14.4.74.	26/66		GMS, Haji Banda, vice Faz. Rabbi term; as not sel; on merit.
4.	Mohammad Shah S/O H. Abdul Jabbar Amir Abad Charsadda.	15.11.75.	28/58		GMS, Takht Abad, vice Mohammad Israr terminated as not selected on merit.
5.	Arshad Hussain S/O Noorul Haq Taru Jabba Nowshera.	12.12.72.	30/57		GMS, Mali Khela Nowshera against vacant PET post.
6.	Qadeem Khan S/O Khan Mohammad Mathra Peshawar.	9.1.73	32/55		GMS, Police Colony, vice Liaqat Ali terminated as not selected on merit.
7.	Mohammad Misal S/O Mansaf Khan Vill; Mangal Bargaib Charsadda.	25.11.74	34/53		GMS Tarnab Charsadda vice Ziaud Din terminated as not selected on merit.
8.	Shah Jehan S/O Jamal Shah Akhween Khel Prang Charsadda.	1.1.73	35/52		GMS No; 1 Nowshera Cantt; Vice Aurangzeb terminated as not selected on merit.

(Page 2 Contd;...)

10/10/75

8.8.55

Ali
Qadeem

(2)

9. Ahmedullah S/O Masrullah Ocha Wala Shebqadar Chd;	17.8.74	39/50.	GHS Tahral Peshawar vice against vacant pos.
10. Lal Said S/O Lal Said Vill; Ghari Chandan Chd;	5.11.72	40/49	GHS Sherkira, vice Ijaz Ahmed terminated as not selected on merit.
11. Sadrul Amin S/O Fatchur Rohman Khoshghi Payan NSR	3.8.72	43/46	GMS, Banda Wabi, vice Fawa Sarwar terminated as not selected on merit.
12. Arifan Ali S/O Tal Ali Vill; Badrashi Nowshera.	3.12.74	44/46	GMS, Kana Khel, vice Tariq Badshah terminated as not selected on merit.
13. Adeel Bahadar S/O Jan Bahadar Nowshera Cantt;	5.4.77	45/46	GMS, Aziz Abad vice Akbar Ali transferred.
14. Anwar Dad S/O Sher Dad Pabasi Payan Nowshera.	10.3.73	46/44	GHS Khairabad vice M/ Sajjad terminated, as not selected on merit.
15. Tariq Mohammad S/O Qasim Khan Audit Colony Peshawar.	22.10.72	51/43	GHS, Kaga Wala vice Ikramullah terminated as not selected on merit.
16. Eika Khan S/O Sahar Khan Ara Khel Mattani Peshawar	25.10.73	52/43	GHS, Adezai Vice Sadat transferred.
17. Mauroz Gul S/O Fazli Ahmad Vill: Tangi Charsadda.	3.2.75	53/43	GHS, Badber Peshawar M. Jaffar terminated as not selected on merit.
18. Faridur Rehman S/O Aziz- ur-Rahman A. Khattak NSR.	4.4.73	55/42	GMS, Mushtarzai vice Zaid Khan terminated and not selected on merit.
19. Shahid Ali S/O Shamsir Khan Manga Dargai Chd:	6.10.76	56/42	GHS, Chamkani Peshawar vice Mohammad Alamzeb terminated, as not selec: on merit.
20. Shahid Aslam S/O Miraj Mohammad Tahral Payan Pesh:	21.9.72	60/39	GMS, Mera Achini Peshawar vice Fazli Majeed term: as not selected on mer:
22. Mohammad Naseer S/O Fazal Mohammad Tangi Charsadda.	7.3.74	61/39	GMS, Charpariza Vice Shahid Ali terminated as not selected on merit.
23. Istikhhar Ahmad S/O Mira Khan, Vill; Rashaki NSR:	15.4.75	64/36	GMS Wala Nowshera vice Mazhar Iqbal terminated as not selected on merit
24. Sahar Gul S/O Ali Jan Mohammad Ward Charsadda.	9.3.74	65/35	GHS Pakhs Ghulam vice Shakirullah terminated as not selected on merit

TERMS AND CONDITIONS/

1. They will be governed by such rules & regulations as may be prescribed by the Govt; from time to time for the category of the Govt; servant to which they belong.
2. Their services will be liable to termination on one month notice from either side. In case of resignation without notice one month pay will be forfeited in lieu thereof.

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(5)

1. They should join the posts within one month of the issue of this notification.
2. Their inter-se-seniority will be determined in accordance with the merit of Departmental Selection Committee.
3. Charge reports should be submitted to all concerned.
4. They shall be on probation for a period of two years and will have to pass Departmental Examination. In case a candidate fails to qualify the Departmental exam; he will be given one more chance, if he fails again then his services will be terminated. On arrival/availability of trained teacher the services of untrained teacher occupies the post will be terminated.
5. Their original certificates Degrees should be checked and verified the concerned University/BISE/RDE and Islamic Madressas concerned before handing over charge.
6. Services books of the teachers must be prepared complete in all respect before handing over charge.
7. The declaration of Assets should be obtained from them immediately and placed on record.
8. They are required to produce health and age certificate from Medical authorities concerned before taking over charge.
9. Charge should not be given to the over age candidate. His case for age relaxation be sent to the concerned quarters.
10. Efforts for transfer before the completion of tenure will disqualify him from the service.
11. No TA/DA etc is allowed.

(GHULAM MUSTAFA)
 DIVL: DIRECTOR OF EDUCATION (SCHCS)
 PESHAWAR DIVISION PESHAWAR.

Enclt; No. 9737-9794 - 1/14 / Dated Peshawar the 26/6 / 1997

Copy to the:-

1. PS to Minister for Education NWFP Peshawar.
2. AG, NWFP Peshawar/DAO Charsadda/Nowshera.
3. DEO (M) Secy; Charsadda/Peshawar/Nowshera.
4. Principal/Headmaster concerned.
5. PA to DSE NWFP Peshawar.
6. Supdt; E/ Branch.
7. P/File.

[Signature]
 for Divl; Director of Education (S),
 Peshawar Division Peshawar.

J. Khanzeb.

[Signature]
[Signature]

7-7-97

OFFICE OF THE DIVL: DIRECTOR OF EDUCATION(S) PESHAWAR DIVN: PESHAWAR.

COMMEMORANDUM

Please read GMS, Safaid Dheri (Peshawar) instead of GMS, Police Colony
Peshawar at Col: No. 5 (Remarks) against the name of
Mr. Qasim Khan S/O Khan Muhammad occurring at S.No. 6
 in the appointment order issued vide this office Endst: No. 7737-9794
 dated 26.6.1997.

(GHULAM MUSTAFA)
 DIVL: DIRECTOR OF EDUCATION (SCHOOLS)
 PESHAWAR DIVISION PESHAWAR.

Endst: No. 11419-27

Dated Peshawar the 7.7.1997

Copy forwarded to the:-

1. Accountant General N.W.F.P. / 1976 Peshawar
2. District Education Officer (M/B) / (1973) Peshawar
3. Principal/Headmaster / XXXXXXXXXXXX GMS, Safaid Dheri Peshawar
4. Principal/Headmaster / XXXXXXXXXXXX
5. Supt: Estt: branch

(Signature)
 7/7/97 ADEO

For/Divl: Director of Education (Schools)
 Peshawar Division Peshawar.

(Signature)
(Signature)

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

SENIORITY LIST OF PET (MALE) TEACHERS

S#	School name	Teacher Name	Fathername	Acad: qual:	Profel: qualif:	Desig:	Dob	District Of domicile	Date Of 1st Appointment	Date Of taking Over Charge In Present Post	Date Of Passing Professional Qualification	Date Of Regular Appointment As Pet
1	2	3	4	5	6	7	8	9	10	11	12	13
1	GMS M.HIDAYAT SHAH	HIMAYAT ULLAH	FAZAL HAMEED	BA	JOPE	PET	01/02/1955	PESHAWAR	01/02/1973	01/02/1973	12/09/1974	12/09/1974
2	GHS HASSAN GARHI	BANAT KHAN	FAZALE HAQ	BA	JOPE	PET	02/02/1953	PESHAWAR	02/01/1976	02/01/1976	17/07/1976	17/07/1976
3	GMS IRREGATION COLONY	MADAD KHAN	HAYAT KHAN	SSC	JOPE	PET	12/12/1956	SWAT	03/09/1975	03/09/1975	17/07/1976	17/07/1976
4	GHSS NO.3 PESHAWAR CITY	MURAD ULLAH	ABDULLAH	BA	JOPE	PET	03/01/1958	PESHAWAR	01/09/1976	01/09/1976	17/07/1976	01/09/1976
5	GHSS CHAMKANI	RABNAWAZ	MUHAMMAD AYAZ	FA	JOPE	PET	05/09/1953	PESHAWAR	15/09/1976	15/09/1976	17/07/1976	15/09/1976
6	GHS GULSHAN REHMAN	MUHAMMAD AKRAM	ABDUR RAUF KHAN	SSC	JOPE	PET	03/06/1954	PESHAWAR	22/08/1977	22/08/1977	17/07/1976	22/08/1977
7	GHS DABGARI GATE	IMTIAZ KHAN	SULTAN KHAN	MA	BED/SOPE	PET	01/04/1958	PESHAWAR	22/11/1976	22/11/1976	15/11/1977	15/11/1977
8	GHS LANDI ARBAB	TARIQ JAVED	YAOUB MASIH	BA	PET	PET	16/06/1959	PESHAWAR	05/12/1977	05/12/1977	15/11/1977	05/12/1977
9	GMS MATANI	ASLAM KHAN	GHULAM RASOOL	SSC	JOPE	PET	01/06/1953	PESHAWAR	17/08/1978	17/08/1978	15/11/1977	17/07/1978
10	GHS NAWAKELI RATA	MUHAMMAD	ABDUL GADAR	BA	JOPE	PET	18/03/1956	PESHAWAR	19/09/1981	19/09/1981	20/08/1978	20/08/1978
11	GCMHS PESHAWAR CITY	ARIF ULLAH	TEHSEENULLAH	BA	JOPE	PET	28/05/1959	PESHAWAR	08/01/1977	21/08/1978	20/08/1978	20/08/1978
12	GHSS NO.1 PESHAWAR CANTT.	SHAD MUHAMMAD	GUL MUHAMMAD	BA	JOPE	PET	07/01/1957	MANSEHRA	20/10/1978	20/10/1978	15/11/1977	20/10/1978
13	GCMHS PESHAWAR CITY	MIAN ZIA UR RAHMAN	MIAN NOOR UL HUDA	MSC	MED	PET	16/06/1960	PESHAWAR	24/10/1978	24/10/1978	20/08/1978	24/10/1978
14	GHS MATHRA	FAZLI JALIL	MUHAMMAD AZIZ KHAN	SSC	JOPE	PET	03/01/1955	PESHAWAR	01/01/1979	01/01/1979	01/08/1979	01/08/1979
15	GHS PAKHA GHULAM	BAKHTIAR KHAN	ABDULLAH JAN	SSC	JOPE	PET	05/05/1959	SWAT	12-02-1978	12-02-1978	15/11/1977	10-01-1980
16	GSS TENKAL BALA	GULZAR AHMAD	MEHIR OIL KHAN	BA	JOPE	PET	01/01/1959	CHARSADDA	03/11/1980	03/11/1980	03/11/1980	13/11/1980
17	GCMHSS NAHAQI	ZAKIULLAH	HAJI FAZLI MULA	MA	BED	PET	15/11/1962	PESHAWAR	15/11/1980	15/11/1980	20/08/1978	15/11/1980
18	GHS REGI	SYED BADSHAH	SYED AKBAR SHAH	SSC	JOPE	PET	12/04/1956	PESHAWAR	21/10/1981	21/10/1981	21/10/1981	21/10/1981
19	GMS GHARI DURANI	SYED SABIR SHAH	SYED MOHD. ZAHID SHAH	SSC	JOPE	PET	10/02/1956	PESHAWAR	24/11/1976	01/12/1981	20/08/1978	01/12/1981
20	GHS SARDAR GARHI	MIAN KALIMULLAH	MIAN MUHAMMAD TAHIR	SSC	JOPE	PET	15/11/1960	MARDAN	02/05/1982	02/05/1982	21/05/1985	21/05/1985
21	GHS SHAGLI PAYAN	NAQEEB KHAN	OIL BAR SHAH	MA	JOPE	PET	15/01/1959	PESHAWAR	26/11/1986	26/11/1986	26/11/1986	26/11/1986
22	GMS WAZIR BAGH NO.1	NAZIR JOHN	AUTO CHUDRY	FA	JOPE	PET	01/09/1960	PESHAWAR	14/11/1985	14/11/1985	22/05/1988	22/05/1988
23	GHSS NO.2 PESHAWAR CANTT.	MUHAMMAD RIAZ	DARUESH KHAN	BA	SOPE	PET	01/05/1965	PESHAWAR	23/12/1986	23/12/1986	22/05/1988	22/05/1988
24	GMS GULBAHAR	JEHAN ZEB	ABDUR RASHEED	BA	JOPE/PET	PET	01/10/1965	PESHAWAR	10/11/1985	10/11/1985	24/04/1989	24/04/1989
25	GMS ANDER SHEHR	IZHAR UL HAQ	DAWAT UL HAQ	BA	JOPE/PET	PET	03/04/1961	PESHAWAR	11/11/1986	11/11/1986	27/04/1989	27/04/1989
26	GHSS NO.4 PESHAWAR CITY	MUHAMMAD SHAHID	MUHAMMAD KHAN	MA	BED	PET	03/02/1968	PESHAWAR	18/02/1988	18/02/1988	22/05/1989	22/05/1989
27	GMS GUNJ GATE	IJAZ ALI	MUHAMMAD ISRIAL	SSC	JOPE	PET	01/05/1959	MARDAN	18/05/1982	18/05/1982	14/11/1990	14/11/1990
28	GCMHS PESHAWAR CITY	FAYAZ KHAN	FAOIR MUHAMMAD	BA	JOPE	PET	01/04/1965	PESHAWAR	24/10/1989	24/10/1989	14/11/1990	14/11/1990
29	GHS KANDI KALOO KHEL	ASAD ULLAH	KHUSHAL KAHN	MA	SOPE	PET	02/01/1968	NOWSHERA	03/12/1989	03/12/1989	14/11/1990	14/11/1990
30	GHSS NO.2 PESHAWAR CANTT.	MUHAMMAD IRSHAD	FAOIR MUHAMMAD	BA	SOPE	PET	27/04/1968	PESHAWAR	12/09/1989	12/09/1989	14/11/1990	14/11/1990

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30-13-12

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

SENIORITY LIST OF PET (MALE) TEACHERS

S#	SCHOOL name	Teacher Name	Fathername	Acad: qual:	Profel: qualif:	Desig:	Dob	District Of domicile	Date Of 1st Appointme nt	Date Of taking Over Charge In Present Post	Date Of Passing Profession al Qualificati on	Date Of Regular Appointmen t As Pet
1	2	3	4	5	6	7	8	9	10	11	12	13
31	GMS SETHIAN	NAVEED KAMAL	MUHAMAMD IOBAL	MSC	SDPE	PET	28/06/1968	PESHAWAR	20/01/1990	14/11/1990	14/11/1990	14/11/1990
32	GHS AKHOON ABAD	ADNAN AKBAR	SAID AKBAR	MA	SDPE	PET	01/01/1970	PESHAWAR	17/09/1989	17/09/1989	14/11/1990	14/11/1990
33	GMS URMER BALA	ZARO ALI	JABBAR KHAN	MA	SDPE	PET	10/03/1961	PESHAWAR	21/11/1990	21/11/1990	30/08/1996	21/11/1990
34	GHS BERI BAGH	NAEEM ULLAH	MUHAMAD HASSAN	BA	JDPE/PET	PET	01/12/1964	PESHAWAR	20/09/1989	20/09/1989	22/10/1991	22/10/1991
35	GHS GULBAHAR NO.2	SARDAR KHAN	LAL GUL	BA	JDPE	PET	16/12/1970	PESHAWAR	24/10/1989	24/10/1989	22/10/1991	22/10/1991
36	GMS NASSAPA	MUHAMMAD FAHIM	FAZLE RAHIM	FA	JDPE	PET	15/03/1971	PESHAWAR	20/10/1993	20/10/1993	27/02/1998	20/10/1993
37	GHS ZAHER ABAD	FAZAL AMIN	ROOHUL AMIN	MA	JDPE	PET	04/01/1965	PESHAWAR	21/10/1993	21/10/1993	25/12/1993	25/12/1993
38	GHSS CHAMKANI	ALAM ZEB	ABDUL MAJID	BA	SDPE	PET	12/02/1971	PESHAWAR	03/11/1993	03/11/1993	25/12/1993	25/12/1993
39	GHS PAKHA GHURAM	FAZAL AHAD	FAZAL RAEBANI	BA	JDPE	PET	18/02/1955	GHARSADDA	01/07/1994	01/07/1994	14/11/1991	01/07/1994
40	GMS RURAL ACADEMY	MUHAMMAD ANWAR	MUHAMMAD SULEMAN	BA	JDPE	PET	06/05/1953	NOWSHERA	17/11/1994	17/11/1994	31/05/1978	17/11/1994
41	GMS PAJAGGI	BADSHAH KHAN	MUHAMMAD ZAMAN	BA	JDPE	PET	01/01/1974	PESHAWAR	19/11/1994	19/11/1994	22/10/1991	19/11/1994
42	GMS WAZEER BAGH NO.2	HABIBULLAH	ZARWAR	FA	JDPE	PET	07/01/1965	PESHAWAR	16/10/1990	16/10/1990	09/01/1995	09/01/1995
43	GMS SUFAID DHERI	AMIN JAN	RAFI ULLAH	FA	JDPE	PET	15/01/1967	PESHAWAR	01/11/1996	01/11/1996	09/01/1995	09/01/1995
44	GHS BUDHANI	ZEENAT ULLAH	SIR BILANO KHAN	MA	JDPE	PET	04/02/1967	PESHAWAR	17/10/1989	17/10/1989	09/01/1995	09/01/1995
45	GHS REGI LALMA	HIDAYAT ULLAH	HAZRAT ULLAH	BA	JDPE	PET	15/08/1970	PESHAWAR	28/11/1994	28/11/1994	09/01/1995	09/01/1995
46	GMS NO.2 TENKAL	MUHAMMAD TARIQ	MIR REHMAN	FA	JDPE	PET	19/04/1973	PESHAWAR	16/11/1995	16/11/1995	11/05/1999	11/05/1995
47	GHS NAK BAND	FATH UR REHMAN	MUNWAR SHAH	MA	JDPE	PET	13/07/1953	PESHAWAR	01/12/1988	01/12/1988	25/05/1995	25/05/1995
48	GMS HAYAT ABAD	ALTAH HUSSAIN	SHAH HUSSAIN	BA	JDPE	PET	04/03/1964	PESHAWAR	12/05/1987	12/05/1987	25/05/1995	25/05/1995
49	GHS SARBAND	MUHAMMAD SADDIQI	ABDUL QAYUM	BSC	BED	PET	11/04/1964	PESHAWAR	02/03/1988	25/05/1995	25/05/1995	25/05/1995
50	GMS BARA GATE	ISMAIL	BEHRAM KHAN	MA	BED/SDPE	PET	07/01/1968	PESHAWAR	27/11/1989	27/11/1989	25/05/1995	25/05/1995
51	GMS M.ISLAM ABAD	MUHAMMAD IRSHAD	SAMAR GUL	BA	JDPE	PET	01/11/1968	PESHAWAR	25/10/1989	25/10/1989	25/05/1995	25/05/1995
52	GHSS NO.1 PESHAWAR CITY	NAZ ALI	AMINULLAH KHAN	MSC	SDPE	PET	11/12/1969	NOWSHERA	17/11/1990	17/11/1990	25/05/1995	25/05/1995
53	GHS MOLOGO	KHALID KHAN	DIN MUHAMAD	BA	SDPE	PET	01/04/1970	PESHAWAR	28/10/1989	28/10/1989	25/05/1995	25/05/1995
54	GMS SATTAR SHAH COLONY	HABIB ULLAH	MOHIBULLAH	MA/B.SC	MED	PET	10/10/1971	PESHAWAR	24/10/1993	24/10/1993	25/05/1995	25/05/1995
55	GMS PIR BALA	MUHAMMAD SALIH	MUHAMMAD YOUSAF KHAN	MA	BED	PET	04/06/1953	PESHAWAR	31/08/1995	31/03/1995	31/08/1995	31/08/1995
56	GMS ASIA GATE	FAZLI KHALIQ	HAMEED NAWAZ	MA	SDPE	PET	01/04/1973	KARAK	30/11/1994	30/11/1994	01/05/1995	31/08/1995
57	GHSS NO.3 PESHAWAR CITY	SADAQAT KHAN	MAHABAT KHAN	MA	MED/SOPE	PET/SDPE	20/05/1971	PESHAWAR	04/04/1996	04/04/1996	04/04/1996	04/04/1996
58	GMS NOTHIA	SARDAR MUHAMMAD DAUD	GHULAM QADAR	BA	JDPE	PET	24/04/1975	PESHAWAR	05/12/1996	05/12/1996	05/12/1996	12/05/1996
59	GHS SHERKIRA	INAYATULLAH	MIR NAWAZ KHAN	MA	BED	PET	01/12/1973	PESHAWAR	05/10/1995	05/10/1995	25/05/1996	25/05/1996
60	GMS TODA	SAREER AHMAD	GSA KHAN	BA	JDPE/SDPE	PET	15/06/1967	PESHAWAR	24/01/1990	24/01/1990	30/06/1996	30/06/1996

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OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&S) EDUCATION PESHAWAR
SENIORITY LIST OF PET (MALE) TEACHERS

S#	SCHOOL name	Teacher Name	Fathemamo	Acad: qual:	Profel: qualif:	Desig:	Dob	District Of domicile	Date Of 1st Appointme nt	Date Of taking Over Charge In Present Post	Date Of Passing Profession al Qualificati on	Date Of Regular Appointmen t As Pet
1	2	3	4	5	6	7	8	9	10	11	12	13
61	GMS LALA KILLI	BASHIR MUHAMMAD	WZIR MUHAMMAD	BA	JOPE	PET	20/08/1956	NOWSHERA	23/03/1992	23/03/1992	30/08/1996	30/08/1996
62	GMS SHEIKH ABAD	JALAL UD DIN KHAN	HAFI SAREER UD DIN	BA	JOPE	PET	20/09/1962	PESHAWAR	23/05/1990	23/05/1990	30/08/1996	30/08/1996
63	GMS SYATI GATE	INAMULLAH	AMAN ULLAH	MSC	SOPE	PET	08/05/1966	CHARSADDA	25/03/1992	25/03/1992	30/08/1996	30/08/1996
64	GHS BARBAR OPAZAI	MUHAMMAD ALI	FACIR MUHAMMAD	BA	JOPE	PET	07/04/1968	PESHAWAR	08/03/1993	08/03/1993	30/08/1996	30/08/1996
65	GCMHS NO.4 PESHAWAR CANTT.	JANAS KHAN	FACIR MUHAMMAD	BA	SOPE	PET	13/12/1968	PESHAWAR	19/03/1992	19/03/1992	30/08/1996	30/08/1996
66	GHSS NO.1 PESHAWAR CITY	MUHAMMAD IQBAL	SHER MUHAMMAD	M.SC	B.ED	PET	02/02/1971	PESHAWAR	21/11/1990	21/11/1990	30/08/1996	30/08/1996
67	GHS JOGIWARA	TEHSEENULLAH	AMANULLAH	BA	JOPE	PET	01/04/1972	PESHAWAR	19/03/1992	19/03/1992	30/08/1996	30/08/1996
68	GHS P.A.F. SHAHEEN CAMP	FALAK NAZ	NASRULLAH	BA	SDPE	PET	13/11/1970	CHARSADDA	31/10/1996	31/10/1996	25/05/1996	31/10/1996
69	GHSS NO.1 PESHAWAR CANTT.	FARMANULLAH	SHASHTI GUL	MSC	SOPE	PET	06/02/1973	PESHAWAR	01/11/1996	01/11/1996	05/01/1995	01/11/1996
70	GHSS DARGA	KHAN ALAM	QASIM JAN	FA	JOPE	PET	03/06/1960	CHARSADDA	21/03/1992	21/03/1992	13/05/1997	13/05/1997
71	GHS G.KARIMDAD	MUMTAZ ALI	GHULAM QADIR	BA	SDPE	PET	15/03/1968	CHARSADDA	21/03/1992	21/03/1992	13/05/1997	13/05/1997
72	GHS BELA BARAMAD KHEL	TEHSINULLAH	SHAYIRULLAH	BA	BED	PET	01/05/1970	CHARSADDA	17/03/1992	17/03/1992	13/05/1997	13/05/1997
73	GHS NODEH PAYAN	BASHIR KHAN	BAKADER KHAN	MA	JOPE	PET	10/04/1972	PESHAWAR	08/03/1993	08/03/1993	13/05/1997	13/05/1997
74	GMS SURAZI PAYAN	JAVED IQBAL	ASMAT KHAN	MA	MED	PET	10/03/1973	PESHAWAR	13/03/1993	13/05/1997	13/05/1997	13/05/1997
75	GHSS NO.1 PESHAWAR CANTT.	RIZWANULLAH	ASMAT KHAN	MA	MED	PET	10/03/1973	PESHAWAR	13/03/1993	13/05/1997	13/05/1997	13/05/1997
76	GMS TOOR BABA	BAKHTIAR GUL	ZIARAT GUL	BA	JOPE	PET	28/04/1974	PESHAWAR	26/06/1997	26/06/1997	25/05/1996	26/06/1997
77	GMS ASAD ANWAR COLONY	MUHAMMAD ZAHID ASLAM	MIRAJ MUHAMMAD	MSC	MSC RPE	PET	21/09/1972	PESHAWAR	28/06/1997	28/06/1997	13/05/1997	28/06/1997
78	GHSS ACEZAI	TEKA KHAN	SAHAR KHAN	BA	JOPE	PET	25/10/1973	PESHAWAR	28/06/1997	28/06/1997	13/05/1997	28/06/1997
79	GHS NOT-HIA	MUHAMMAD RIAZ	IMAM GUL	BA	BED	PET	10/10/1970	PESHAWAR	01/07/1997	01/07/1997	25/05/1996	01/07/1997
80	GMS PALOSI ATOZI	QADEEM KHAN	KHAN MUHAMMAD	BA	SOPE	PET	09/01/1973	CHARSADDA	07/07/1997	07/07/1997	13/05/1997	07/07/1997
81	GHS NO.3 PESHAWAR CANTT.	MUHAMMAD WAJID KAMAL	MUHAMMAD TAHIR	BA	JOPE	PET	03/01/1970	PESHAWAR	20-08-1997	20-08-1997	20/08/1997	20/08/1997
82	GHS GERHI SHERDAD	AURANGZEB KHAN	KHAIR MUHAMMAD	MSC	MED/SOPE	PET	05/01/1971	PESHAWAR	20/08/1997	20/08/1997	17/09/1997	17/09/1997
83	GMS TARNAB FARM	WAJIDUR REHMAN	AZIZ UR REHMAN	BA	MED	PET	20/03/1972	NOWSHERA	23/12/1990	05/10/1997	13/05/1997	05/10/1997
84	GMS ZIARAT KOROONA	ASMAT KHAN	NOOR HABIB	BA	JOPE	PET	05/04/1970	CHARSADDA	24/10/1993	24/10/1993	27/02/1998	27/02/1998
85	GMS GUNJ MANDI	NASIR JAMAL	NOOR MUHAMMAD	BA	JOPE	PET	01/09/1970	PESHAWAR	20/10/1989	20/10/1989	27/02/1998	27/02/1998
86	GHSS TEHKAL	FAKHRE ALAM	MUHAMMAD IQBAL KHAN	BA	BED/SOPE	PET	06/01/1971	CHARSADDA	01/07/1997	01/07/1997	09/01/1995	30/11/1998
87	OYO E D C (E&S) PESHAWAR	SHAH JEHAN	ROOHUL QUDUS	MA	MSC RPE	PET	18/05/1971	PESHAWAR	07/04/1999	07/04/1999	01/08/1993	07/04/1999
88	GHS GHARIB ABAD	ALAMZEB	GHULAM JAN	MA	JOPE	PET	01/04/1966	PESHAWAR	02/12/1994	02/12/1994	11/05/1999	11/05/1999
89	GHS AHMED KHEL	SAEED UR REHMAN	SHAMSU ZAMAN	MA	BED	PET	04/03/1970	PESHAWAR	01/11/1996	01/11/1996	11/05/1999	11/05/1999
90	GHS G.GHULAM SHAH	HAMAYUN	AJAB GUL	MA	BED/SOPE	PET	01/05/1970	PESHAWAR	08/05/1995	08/05/1995	11/05/1999	11/05/1999

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OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&S) EDUCATION PESHAWAR
SENIORITY LIST OF PET (MALE) TEACHERS

S#	SCHOOL name	Teacher Name	Fathernama	Acad: qual:	Profel: qualif:	Desig:	Dob	District Of domicile	Date Of 1st Appointme nt	Date Of taking Over Charge In Present Post	Date Of Passing Professional Qualificati on	Date Of Regular Appointmen t As Pet
1	2	3	4	5	6	7	8	9	10	11	12	13
91	GHS LAKARI KANIZA	MUHAMMAD YASEEN	WALI MUHAMMAD	BA	JOPE	PET	02/03/1973	PESHAWAR	01/08/1997	01/08/1997	11/05/1999	11/05/1999
92	GHS CHAR PAREZA	MUHAMMAD YOUNAS	ABDULLAH	BA	JOPE	PET	08/03/1974	PESHAWAR	30/10/1996	30/10/1996	11/05/1999	11/05/1999
93	GMS LANDI ARBAB	SHERAZ KHAN	ATAULLAH	BA	JOPE	PET	15/03/1974	PESHAWAR	18/12/1995	18/12/1995	11/05/1999	11/05/1999
94	GHS MOHAMMAD ALI KILLI	MAZHAR HUSSAIN	ALIF KHAN	MSC	SDPE	PET	01/09/1974	PESHAWAR	01/08/1997	01/08/1997	11/05/1999	11/05/1999
95	GMS HAJI BANDA	GUL ISLAM	MUHAMMAD ISLAM	FA	JOPE	PET	12/03/1975	PESHAWAR	01/07/1997	01/07/1997	11/05/1999	11/05/1999
96	GMS ASIA PARK	MAZHAR ALI	IMAM ALI	MSC	BED	PET	04/04/1976	PESHAWAR	13/12/1999	13/12/1999	11/05/1999	11/05/1999
97	GMS SAMIA BADABER ISSA KHEL	LIAQAT ZARIN	MIR ZAMAN	BA	JOPE	PET	06/01/1977	PESHAWAR	07/07/1999	07/07/1999	05/05/1998	07/07/1999
98	GHSS WAZEER BAGH	RAHMAN GUL	HAJI GHAZI GUL	BA	JOPE	PET	01/05/1973	PESHAWAR	01/06/1995	01/06/1995	05/11/1999	05/11/1999
99	GHS SHERAZ KHAN	MUHAMMAD ASIF MUGRA	MUHAMMAD ASIF MUGRA	MA	BED	PET	25/11/1972	PESHAWAR	14/12/1999	14/12/1999	11/05/1999	14/12/1999
100	GMS NODEN PAYAN	MUHAMMAD YOUNIS KHAN	MUHAMMAD ISMAIL KHAN	MA	BED	PET	12/02/1975	PESHAWAR	14/12/1999	14/12/1999	11/05/1999	14/12/1999
101	GMS B.EAZID KHEL	SAID BADSHAH	JAN BAHADER	BA	JOPE	PET	01/04/1975	PESHAWAR	15/12/1999	15/12/1999	11/05/1999	15/12/1999
102	GHS ZARYAB COLONY	MUHAMMAD NAEEM JAN	MUHAMMAD AZEEM KHAN	M.SC	SDPE	PET	02/09/1975	PESHAWAR	30/06/1997	15/12/1999	27/02/1998	15/12/1999
103	GHS CIVIL QUARTERS	MUHAMMAD FAYAZ	FARIDON	BSC	MED/SOPE	PET	01/03/1974	CHARSADDA	24/12/1999	24/12/1999	09/01/1995	24/12/1999
104	GMS TAJHT ABAD	ZAHID ALI	HIDAYAT UR REHMAN	BA	JOPE	PET	25/06/1969	PESHAWAR	01/01/2000	01/01/2000	25/05/1995	01/01/2000
105	GMS TAJA SEENGAN	SYED AHMAD WASI	ANIS AHMAD	MA	BED	PET	15/12/1964	PESHAWAR	01/11/1995	01/11/1995	25/04/2000	25/04/2000
106	GMS G.SIKANDAR KHAN	TASNEEM ZIA	HUMAYUNE KHAN	MA	MED	PET	15/05/1969	PESHAWAR	01/11/1996	01/11/1996	25/04/2000	25/04/2000
107	GHSS HAYAT ABAD PESHAWAR	ABDUL KHALIQ	FIDA MUHAMMAD	BA	BED	PET	01/10/1969	PESHAWAR	18/11/1996	18/11/1996	25/04/2000	25/04/2000
108	GHS RASHEED GARHI	GUL BADSHAH	KHAN BADSHAH	BA	JOPE	PET	20/05/1971	PESHAWAR	01/11/1995	01/11/1995	25/04/2000	25/04/2000
109	GHS HAFYANA BALA	MUKHTAR AHMAD	AZIZ UR RAHMAN	BA	JOPE	PET	17/10/1965	CHARSADDA	18/03/1992	18/03/1992	11/05/1999	01/04/2001
110	GHS SUFAID DERI	AJMAL KHAN	MUSAM KHAN	BA	JOPE	PET	10/03/1969	PESHAWAR	10/12/1995	10/12/1995	31/03/2002	31/03/2002
111	GHS G.CHANDAN PAYAN	AWAL SAID	LAL SAID	MA	BED	PET	05/11/1972	PESHAWAR	05/07/1997	05/07/1997	31/03/2002	31/03/2002
112	GMS CHARKHA KHEL	ZARSHAD KHAN	NOSHAD KHAN	MA	BED	PET	15/03/1981	PESHAWAR	29/05/2004	29/05/2004	05/05/2003	29/05/2004
113	GHS SHEKH MUHAMMADI	MUHAMMAD FAYAZ	KHAN BAHADER	MA	SOPE	PET	04/03/1975	PESHAWAR	31/05/2004	31/05/2004	25/04/2000	31/05/2004
114	GMS ACHINI BALA	RIWAYAT KHAN	NOOR ZADA	MA	SOPE	PET	15/08/1977	PESHAWAR	31/05/2004	31/05/2004	31/03/2000	31/05/2004
115	GMS MUSTERZAI	RAHAT ALI	SARCAR ALI	MA	SOPE	PET	15/03/1978	PESHAWAR	31/05/2004	31/05/2004	31/03/2002	31/05/2004
116	GMS KHLR KHURAI	FARMAN ULLAH	JAMIL AHMAD	MA	BED	PET	16/08/1979	PESHAWAR	31/05/2004	31/05/2004	31/03/2002	31/05/2004
117	GMS PASSANI	RABYAN	MUHAMMAD AZEEM	MA	JOPE	PET	10/01/1976	PESHAWAR	01/06/2004	01/06/2004	25/04/2004	01/06/2004
118	GHS URMER MAINA	TAHSEENULLAH	AZIZ ULLAH	BA	JOPE	PET	01/01/1978	PESHAWAR	01/06/2004	01/06/2004	25/04/2000	01/06/2004
118(A)	GHS NO.3 PESHAWAR CANTT.	HASEEB ULLAH	MUHEEBULLAH	BA	JOPE	PET	12-04-1976	PESHAWAR	12-10-2004	12-10-2004	05/05/2003	12-10-2004
119	GHS P.K.EALA	ABDUL QADIR	ABDUL MAJEED	MA	SOPE	PET	20/11/1975	PESHAWAR	13/10/2004	13/10/2004	25/04/2000	13/10/2004

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

SENIORITY LIST OF PET (MALE) TEACHERS

S#	School name	Teacher Name	Fathername	Acad: qual:	Profel: qualif:	Desig:	Dob	District Of domicile	Date Of 1st Appointment	Date Of taking Over Charge In Present Post	Date Of Passing Professional Qualification	Date Of Regular Appointment As Pet
1	2	3	4	5	6	7	8	9	10	11	12	13
120	GMS KHAZANA SHUGAR MILL	NIJAZ MUHAMMAD	TILA MUHAMAMD	MA	SOPE BED	PET	06/12/1978	PESHAWAR	13/10/2004	13/10/2004	25/04/2000	13/10/2004
121	GHS MARYAMZAI	ZARTAJ	ABDUL QAYUM	MA	JDPE	PET	01/09/1970	PESHAWAR	01/03/2006	01/03/2006	05/05/2003	01/03/2006
122	GMS KHAZANA SUGAR MILLS	IRSHAD MUHAMMAD	MIAN MUHAMAMD	BA	SOPE	PET	01/07/1974	PESHAWAR	20/03/2006	20/03/2006	05/05/2003	20/03/2006
122(A)	GHSS NO.1 PESHAWAR CANTT.	RIZWANULLAH	SAID AFZAL	MA	SOPE	PET	06/09/1973	CHARSADDA	08/06/1996	13/05/1997	13/05/1997	01/08/2006
123	GMS PALOSI TELERZI	HAMEED UR REHMAN	SAIF UR REHMAN	BA	JDPE	PET	16/03/1967	CHARSADDA	03/12/1989	03/05/1990	22/10/1991	05/01/2007
124	GMS ZARYAB COLONY	NAUSHAD KHAN	RAHMAN UD DIN	MA	MEL/SCPE	PET	25/03/1968	CHARSADDA	06/03/1990	21/03/1993	01/03/1995	04/07/2008
125	GHS SUREZAI BALA	MUHAMMAD NAEEM	FAZAL SUBHAN	MA	SOPE	PET	06/06/1976	DIR LOWER	08/04/1999	08/04/1999	31/03/2002	08/08/2008
126	GHS HAYAT ABAD	AFTAB ALAM	AMIR MUHAMMAD KHAN	MA	JDPE	PET	04/06/1976	PESHAWAR	02/12/2002	02/12/2002	31/03/2001	01/09/2008
127	GMS KHUDA DAD	KHALID USMAN	IHSANULLAH	MA	SOPE	PET	17/08/1980	PESHAWAR	22/11/2004	18/09/2008	15/09/2006	18/09/2008
128	GMS ALI ZAI	ZAKIRULLAH	FAZAL ELAHI	MA	SOPE	PET	08/11/1980	PESHAWAR	18/09/2008	18/09/2008	07/06/2004	18/09/2008
129	GMS KANKOLA	FALAK NAZ	RAHMAN GUL	MA	JDPE	PET	02/01/1981	PESHAWAR	18/09/2008	18/09/2008	28/12/2004	18/09/2008
130	GHS MASHO KHEL	SAID KAMAL SHAH	DAD KHAN	BA	JDPE	PET	03/01/1981	PESHAWAR	18/09/2008	18/09/2008	28/12/2006	18/09/2008
131	GHSS MUSA ZAI	NASRULLAH	WASI ULLAH	BA	JDPE	PET	16/04/1981	PESHAWAR	18/09/2008	18/09/2008	07/06/2004	18/09/2008
132	GHS P.K.PAYAN	NIZAR UL HAQ	ATTA MUHAMAMD	MA	SDPE	PET	27/04/1981	PESHAWAR	18/09/2008	18/09/2008	28/12/2004	18/09/2008
133	GMS G.CHANDAN BALA	ALAM ZEB	ZIARAT GUL	MA	JDPE	PET	11/02/1984	PESHAWAR	18/09/2008	18/09/2008	28/12/2006	18/09/2008
134	GMS YOUSAF KHEL	MUHAMMAD YOUSAF	ZABITA KHAN	BA	JDPE	PET	15/04/1984	PESHAWAR	18/09/2008	18/09/2008	28/12/2006	18/09/2008
135	GHS H. MUHAMMAD NOOR KULLI	SAMIULLAH	MUHAMMAD IBRAHIM	MA	SOPE	PET	24/09/1984	PESHAWAR	18/09/2008	18/09/2008	28/12/2006	18/09/2008
136	GMS BHANA MANI	SYED ASAD ALI SHAH	SYED PIR SAKHI SHAH	BA	BED	PET	01/06/1985	PESHAWAR	18/09/2008	18/09/2008	28/10/2006	18/09/2008
137	GHSS NO.1 PESHAWAR CITY	M WALI KHAN	GUL WALI	BA	JDPE	PET	20/12/1985	PESHAWAR	18/09/2008	18/09/2008	15/09/2006	18/09/2008
138	GMS G.CHANDAN DAUDZAI	MUHAMAMD AYAZ	KHAIR ZAMAN	BA	JDPE	PET	21/03/1986	PESHAWAR	18/09/2008	18/09/2008	28/12/2006	18/09/2008
139	GHS SUFAID DHERI	MUJEEBULLAH	MOHIBULLAH	BA	JDPE	PET	05/05/1989	PESHAWAR	18/09/2008	18/09/2008	30/12/2005	18/09/2008
140	GHS MATHRA	AZMAT KHAN	GUL MAST KHAN	BA	JDPE	PET	01/02/1982	PESHAWAR	19/09/2008	19/09/2008	07/06/2004	19/09/2008
141	GHS KAGA WALA	GULZAR KHAN	NISAR KAHN	MA	JDPE	PET	08/01/1981	PESHAWAR	25/03/2009	25/03/2009	28/12/2005	25/03/2009
142	GHSS CHIGER MATTI	SHAH FAISAL	ABDUL MAJEED KHAN	BA	SOPE	PET	26/05/1976	PESHAWAR	16/12/1999	21/07/2009	09/09/2006	21/07/2009
143	GHSS HAZARKHAWANI	MAJID KHAN	WAJID ULLAH	MA	SOPE	PET	03/03/1981	PESHAWAR	13/03/2004	13/03/2004	15/05/2003	01/01/2010
144	GMS ACHINI PAYAN	MUHAMMAD ZAKIR	MUHAMMAD ZAHIR	BA	JDPE	PET	04/08/1985	PESHAWAR	30/04/2011	30/04/2011	27/09/2006	30/04/2011
145	GHS TELA BAND	ASIF KHAN	MUHAMMAD IBRAHIM KHAN	MA	PET	PET	12/09/1980	PESHAWAR	09/05/2011	09/05/2011	28/12/2006	09/05/2011
146	GHS MATTANI	RIFAQAT ALI	ABDUL JALIL	MA	PET	PET	16/11/1983	PESHAWAR	09/05/2011	09/05/2011	28/12/2006	09/05/2011
147	GHSS URMAR PAYAN	WAJIDULLAH	FAZLI MEHMOOD	BA	JDPE	PET	15/11/1985	PESHAWAR	09/05/2011	09/05/2011	14/05/2007	09/05/2011

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OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&S) EDUCATION PESHAWAR
SENIORITY LIST OF PET (MALE) TEACHERS

S#	Sch/CL name	Teacher Name	Fathername	Acad: qual:	Profel: qualif:	Desig:	Dob	District Of domicile	Date Of 1st Appointment	Date Of taking Over Charge In Present Post	Date Passi Profesi al Quali on
1	2	3	4	5	6	7	8	9	10	11	12

Certified that this S/List of PET Female Teachers is not disputed, non-judicious and is final. All the PET Teachers working in this district are included in this list.

DISTRICT EDUCATION OFFICER
(MALE) PESHAWAR

Abdul Qadir

181

19

F

17-8-13

To

The District Education Officer (Male),
School & Literacy, Peshawar

Through Proper Channel

Subject: Seniority List/Request for Placement on the Proper Place

R/Sir,

With profound reverence it is stated that;


- (i) I was appointed as PET in 1997 (copy of appointment order attached);
- (ii) My name appeared in the appointment order at Sr. No.6 with 32nd position on the merit list;
- (iii) I have come to know that promotions of the PETs are being made and one, Mr.Zahid Aslam s/o Miraj Muhamamd, junior on the merit list is being considered for promotion ignoring me;
- (iv) The said Mr.Zahid Aslam appears in the appointment order at Sr. No.21.
- (v) According to Rule-17(1)(a) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, seniority of appointees appointed through direct recruitment in one batch shall be determined on the basis of merit assigned (copy of relevant rule attached);
- (vi) Promotion of a junior official while ignoring the applicant is against the canon of justice and gross violation of rules;

It is, therefore, requested that my request may kindly considered, I may be placed at the proper placed on the seniority list and be considered for promotion prior to the above mentioned PET.

I shall remain highly grateful for the kindness.


copy: District - (ESS) Education KPK, Peshawar

Yours obediently,


Qadeem Khan
PET, Palosi Atozai,
Peshawar
Cell # 0333-9416428

Dated August 16, 2013

Forwarded to DEO (M), S&L, Peshawar
for further action please.


Head Master
G.M.S. Palosi Atozai
Peshawar.

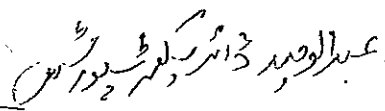
Dated: 16/8/2013

Dairy No: 376



D. E. O. D. No = 17/8/13

Director = 20/8/13 No = 218



11-9-13

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PESHAWAR.NOTIFICATION.

Consequent upon the approval of the DPC in continuation of the Director (E & S E) Khyber Pakhtunkhwa Peshawar Notification No: 1557-63 Dated 19-08-2013 the following Senior PET BPS-16 and PET BPS-15 are hereby adjusted in the schools mentioned against their names in the interest of public service with immediate effect on the terms and conditions already framed in the above notification.

S.NO:	NAME OF TEACHER	DESIG: WITH BPS	PRESENT SCHOOL	ADJUSTED AT	REMARKS
1-	MR.JAVED IQBAL	B-16	GHS SUREZAI PAYAN	GHS SURIZAI PAYAN	POST ALREADY OCCUPIED
2-	MR.BAKHTIAR GUL	B-16	GMS TOOR BABA	GHS WADAPAGGA	AGAINST VACANT POST
3-	MR.MUHAMMAD ZAHID ASLAM	B-16	GMS NOTHIA	GHS NO:3 CANTT:	VICE S.#4
4-	MR.MUHAMMAD WAJID KAMAL	B-15	GHS NO.3 CANTT:	GMS NOTHIA	VICE S.#3

- NOTE: i) Charge shall not be honored until verification of the order from the undersigned.
- ii) Entries shall not be made in their Service Books and Pay change shall not be processed until the verification of their documents/certificates.

(ABDUL BASIT)
DISTRICT EDUCATION OFFICER
(MALE) PESHAWAR.

Endst: NO: 2663-74 Dated 11/9/2013.

Copy of the above is forwarded to the:-

- 1- Accountant General Khyber Pakhtunkhwa Peshawar.
- 2- Director (E&SE) Khyber Pakhtunkhwa Peshawar.
- 3- Principal/Head Master/DDO,s concerned.
- 4- PA to District Education Officer (M) Peshawar.
- 5- Teachers concerned.
- 6- Cashier Local Office.

Attested
Basit

DY: DISTRICT EDUCATION OFFICER
(MALE) PESHAWAR.

21

H

11-10-13

To

The District Education Officer (Male),
Elementary & Secondary Education, Peshawar

Through Proper Channel

Subject: Appeal Against Wrong Placement in Seniority and Allowing Promotion to Junior vide Notification Dated 11.09.2013

R/Sir,

With profound reverence it is stated that;

- (i) I was appointed as PET in 1997 (copy of appointment order attached);
- (ii) My name appeared in the appointment order at Sr. No.6 with 32nd position on the merit list;
- (iii) I have come to know that promotions of the PETs were made vide Notification dated 11.09.2013 and one, Mr.Zahid Aslam s/o Miraj Muhamamd, junior on the merit list was promoted ignoring me (copy attached);
- (iv) The said Mr.Zahid Aslam appears in the appointment order at Sr. No.21.
- (v) According to Rule-17(1)(a) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, seniority of appointees appointed through direct recruitment in one batch shall be determined on the basis of merit assigned;
- (vi) Promotion of a junior official while ignoring the applicant is against the canon of justice and gross violation of rules;
- (vii) I have previously preferred an appeal in the matter (copy along with its annexures attached), the fate of which still unknown despite a lapse of almost two months.

It is, therefore, requested that my request may kindly be considered, I may be placed at the proper placed on the seniority list and be considered for promotion prior to the above mentioned PET.


I shall remain highly grateful for the kindness.

DEO.D.NO-3542
Date = 12/10/13

Dated October 11, 2013

Forwarded to DEO for further action please.
Head Master
G.M.S. Palosi Atozai
Peshawar
11/10/13

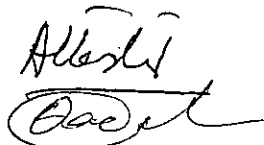
Yours obediently,


Qadeem Khan
PET, Palosi Atozai,
Peshawar
Cell # 0333-9416428

Directorate Sainy No: 1983
Date = 11/10/13

CC.

Copy forwarded to the Director, Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar



[Handwritten notes]

مخدمت فنان و مشرکٹ ایجوکیشن آفیسر (مردانہ) ایلمنٹری اینڈ سیکنڈری ایجوکیشن، بساڈ
 درخواست نمبر : - عطا ٹیلی سناری لست برائے P.E.T سال 2012-13

جناب عالی !

بناوٹ عارضی سے آپ کی خدمت میں گہرا رسی کی جاتی ہے کہ
 مذکورہ دفتر سے سال 2012-13 کے لیے PET سناری لست جاری کی گئی
 جس پر تاریخ اجراء درج ہیں -
 آپ سے التماس ہے کہ بندہ کو مذکورہ سناری لست کورنگ لست
 کے ساتھ بمع تاریخ اجراء جاری کرنے کے حکم صادر فرما کر مشکور فرمائیں۔
 نوازش ہوگی۔

مورفہ :- 5/12/2013

Forwarded and recommended
 for further action to
 DEO (iii) Elementary Education
 Secondary Path Head Wazir
 G.M.S. Palosi Atozai
 Peshawar.
 Dated 5/12/2013

العارف
 عظیم خان
 ڈی ای سی
 گورنمنٹ میڈل سکول
 بلوچی انڈسٹری بساڈ

Day No: 378 DEO office Dairy No - 4291
 dt - 5/12/2013

Attest
 Oae

بعد الت بناب سروس ٹریڈنگ کے لیے ایک نوٹ

مورثہ

قدم خان بنام محمد تعلیم دہشترہ

دعویٰ اسل

باعت پر ایک نوٹ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کاروائی متعلقہ آن مقام کے لئے سعد اللہ خان مروت ایڈووکیٹ ہائی کورٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کابل اختیار ہوگا نیز وکیل صاحب کو کرنے رضی نامہ و تقریر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور عرضی دعویٰ اور درخواست پر قسم کی تصدیق اور اس پر دستخط کرانے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا نمائندہ قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر واختہ منظور قبول ہوگا و دوران مقدمہ میں جو خرچہ و ہرجانہ التواء مقدمہ پر کہ سبب سے ہوگا اس کے مستحق وکیل صاحب موصوف ہوں گے نیز بقایا و خرچہ کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا عدسے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکور کریں۔

لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم $\frac{12}{13}$ 16

العبد العبد العبد



قدم

سعد اللہ خان مروت
ایڈووکیٹ
ارباب سبب اہمال
مروت
مس روینہ ناز
ایڈووکیٹ

33

BEFORE THE HONOURABLE SERVICES TRIBUNAL KPK PESHAWAR

SERVICES APPEAL NO.1611/2013

QADEEM KHAN VS GOVT

PARA WISE COMMENTS ON AND FOR BEHALF OF RESPONDENTS NO.1,2& 3.

Respectfully sheweth:-

The respondents submit as under:-

PRELIMINARY OBJECTIONS:-

1. That the appellant has got no cause of action /lotus standi.
2. That the appellant has not come to this honourable Tribunal with clean hands.
3. That the instant appeal is based upon, malicious/vexation, frivolous grounds.
4. That the appellant is estopped by his own conduct to file the instant appeal.
5. That the instant appellant is against the relevant recruitment policy.
6. That the matter / process have been completed by respondents.
7. That the instant appellant is bad for mis-joinder and non-joinder of the necessary parties to the appeal.
8. That the instant appell is badly time barred.
9. That the instant appellant is not maintainable in its present form.

Facts:

1. That Para No.1 is legal hence no comments.
2. That Para No.2 is correct up to the extent that respondents No.1 appointed appellant along with respondent No.4,5 and others on 26/06/1997 but appellant failed to take charge with in time and respondents No.4,5 and others took charge before the appellant , thus respondents No.4,5 become Senior from appellant and the Seniority of the Govt: servant determined from the date of taking over charge on the post .In the instant case respondents No.1 sought guidance on the subject from the Director E & SE Khyber Pakhtunkhwa Peshawar ,who issued guidance that the seniority will be determined from the taking over charge of appointee through his letter No.1466 F.No15 Vol-2nd /General/Appeal of PSTs /DPEs dated: Peshawar the 08/07/2014.
(Letter enclosed as annexure. A)
3. That Para No.3 is self-explanatory with regard to the appellant stance, who himself admitted the fact that he on 05/07/1997 approached the school from which he was appointed. It showed the delay from taking over charge on the post while other appointees approached the concerned school before the appellant.
4. Correct to the extent of corregindum.
5. That Para No.5 is correct up to the extent that respondent No.1 issued Seniority List of all PETs from the date of taking over charge on their post.
6. Pertained to read.
7. That Para No.7 is also incorrect.

Grounds:-

- a. That Ground A is in-correct the Appellant was treated according to hear.
- b. That reply of Ground B has discussed in the above paras.
- c. That Ground C is in-correct
- d. That Ground D is In-correct.
- e. That Ground E is in-correct respondent acted according to law and rules.
- f. That Ground F is In-correct.

It is therefore requested before this Honourable Tribunal that on acceptance of this Para wise comments the appeal in hand be dismissed.

Director
(E&SE) KPK Peshawar

District Education Officer
(Male) Peshawar

Secretary to Govt:
(E&SE) Department KPK Peshawar



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Ann-A 21

**DIRECTORATE OF ELEMENTARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHWA,
PESHAWAR**

No. 1466 / F.No. 15 Vol 2nd / General Appeals of PETs/DPEs.
Dated Peshawar the: 8/7 /2014.

To

The District Education Officer,
(Male) Peshawar

Subject: - **ADVICE REGARDING SENIORITY LIST /REQUEST FOR PLACEMENT
ON PROPER PLACE**

I am directed to refer to your letter No. 5141 dated 03.03.2014 on the subject cited above and to ask you that this office has examined the case and found that the seniority list of PETs (Male) prepared by your office as per date of taking over charge is correct.

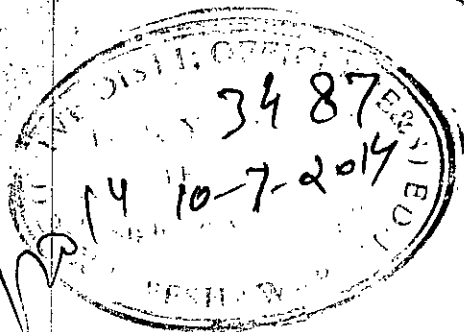
Assistant Director (PE&S)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No. _____ /

Copy to the:-

1. PA to Director E&SE Khyber Pakhtunkhwa local office.

Assistant Director (PE&S)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar



15 →

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

APPEAL NO 1611/2013

Qadeem khan VS Govt:

AFFIDAVIT

I Mr. Abdul Karim ADEO litigation of the District Education office (Male) Peshawar do here by affirm and declare on path that the contents of the para wise commesnts are true and correct to the best of my knowledge and belief and that nothing has been concealed of this honourable service tribernal

Deponent
Abdulkarim
17 301-1618323-7



Shaukat Ali
23-6-2013

Advocate High Court Peshawar BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service appeal No. 1611/2013

Qadeem Khan Verses Secretary Education & others

REPLY ON BEHALF OF THE RESPONDENT NO. 4 ON THE ABOVE
MENTIONED APPEAL

Respectfully Sheweth:-

Parawise reply/Comments on behalf of the Respondent No.4 are as under:-

PRELIMINARY OBJECTIONS:-

1. That the instant appeal is badly time barred.
2. That the appellant has got no cause of action/Locus standi.
3. That the instant appeal is not maintainable in its present form.
4. That the instant appeal is against the relevant recruitment policy.
5. That the matter/process have been completed by respondents.
6. That the appeal is based upon malicious, vexation and frivolous grounds.
7. That the appellant has not come to this Honourable Tribunal with clean hands.
8. That the appellant is estopped by his own conduct to file the instant appeal.
9. That the instant appeal is bad for mis-joinder and non-joinder of the necessary parties to the appeal.

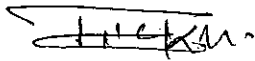
Facts:-

1. That para No. 1 of the appeal is Legal and will be discussed/explain/argu at the time of arguments.
2. That para No. 2 of the appeal is correct upto extent that respondent No. 1 appointed appellant alongwith respondent No. 4, 5 & others on 26/06/1997, but appellant failed to take charge with in time and respondents No. 4, 5 become Senior from appellant and the seniority of the Govt. Servant determined from the date of taking over charge on the post. According to service rules, who will take over charge eariler/before will be consider senior and who will take over charge later will be consider junior, so Respondent No. 4 will considered to be senior as respondent NO.4 took over charge before the appellant.
3. That para No. 3 is self explanatory with regard to the appellant stance who himself admitted the fact that he on 05/07/1997 approached the school from which he was appointed. It showed that delay from taking over charge on the post while other appointees approached the concerned school before the appellant.
4. That para No. 4 of the appeal is accepted correct to the extent of corregendum.
5. That para. No. 5 of the appeal accepted correct up to the extent that the list of Seniortity was issued by the Respondent No.1 of all the PETs from the date of takin over charge of their posts.
6. That para No.6 of the appeal need no reply and will be discussed at the time of argument.
7. That para No. 7 of the appeal is incorrect against the law , Facts, Circumstance and based on malafies.


Grounds:-

- A. That ground-A of the appeal is incorrect and not maintainable in its present form, because the appellant has been treated according to the Transfer and Promotion Rules, 1989.
- B. That ground-B of the appeal is already been discussed in the above mentioned paras.
- C. That ground-C of the appeal is totally incorrect, hence denied, it is also pertinent to mention here that the seniority will be considered from the date of taking over charge of the post.
- D. That ground-D of the appeal is incorrect, because the appellant is well aware of his appointment, but he could not take over charge on the prescribed time.
- E. That ground-E of the appeal is not relevant to the Respondent No.4. hence no comments.
- F. That ground-F of the appeal is also not relevant to the Respondent No.4, hence no comments.

It is, therefore, most humbly prayed that on acceptance of this reply on behalf of respondent No.4 the appeal of the appellant may kindly be dismissed with cost.


Respondent No.4
TIKA KHAN

Through,


(Muhammad Bashir Naveed)
Advocate Peshawar
03005990975

BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR

S.A No: 1611/2013

Qadeem Khan

Versus

Govt. & Others

REPLICATION

Respectfully Sheweth,

PRELIMINARY OBJECTION.

All the 9 preliminary objections are illegal and incorrect. No reason in support of the same is ever given as to why appellant has no cause of action, unclean hands, malicious/vexation frivolous grounds, estoped by his own conduct, against the relevant recruitment policy, matter/process have been completed by respondents, mis & non joinder of parties, badly time barred and appeal is not maintainable in its present form.

ON FACTS

1. Admitted correct by the respondents.
2. Not correct. The para of the appeal is correct, regarding merit position as appellant was at Serial No. 6 while R. No. 4 and 5 were at Serial No. 16 & 21. Moreso, appellant secured 55 marks while No. 4 & 5 secured 43 & 39 marks respectively. Charge of assumption is not relevant but merit list.
3. As above.
4. Admitted correct by the respondents, regarding issuance of corrigendum.
- 5-7. As above.

GROUND S:

All the grounds of the respondents are illegal and incorrect while that of the appeal are legal and correct. The same are reaffirmed once again in support of the appeal:

It is, therefore, most humbly requested that the appeal be accepted as prayed for.

Appellant

Through

Dated: .12.2015

Saadullah Khan Marwat


Arbab Saif Ul Kamal

Miss Rubina Naz
Advocates,

AFFIDAVIT

I, Qadeem Khan S/o Khan Muhammad, P.E.T, G.M.S, Palosi Atozal, Peshawar, appellant do hereby solemnly affirm and declare that contents of the **Appeal & replication** are true and correct to the best of my knowledge and belief.

I reaffirm the same on oath once again to be true and correct as per the available record.

DEPONENT

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 2038 /ST

Dated 5 / 12 / 2016


To

The D.E.O (Male),
Government of Khyber Pakhtunkhwa,
Peshawar.

Subject: - **JUDGMENT**

I am directed to forward herewith a certified copy of Judgement dated 28.11.2016 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

12/12/16

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No. _____/ST

Dated _____/2016

To,

1. The District Police Officer,
Peshawar.
2. The District Police Officer,
Mardan.
3. The District Police Officer,
Charsadda.
4. The District Police Officer,
Swabi.
5. The District Police Officer,
Malakand.
6. The District Police Officer,
Swat.
7. The District Police Officer,
Dir Upper.
8. The District Police Officer,
Dir Lower.
9. The District Police Officer,
Chitral.
10. The District Police Officer,
Haripur.
11. The District Police Officer,
Abbottabad.
12. The District Police Officer,
Maneshra.
13. The District Police Officer,
Batagram.
14. The District Police Officer,
Kohistan.
15. The District Police Officer,
Torghar.
16. The District Police Officer,
Kohat.
17. The District Police Officer,
Karak.
18. The District Police Officer,
Bannu.
19. The District Police Officer,
Tank.
20. The District Police Officer,
Hangu.
21. The District Police Officer,
Lakki Marwat.
22. The District Police Officer,
D.I.Khan.
23. The District Police Officer,
Nowshera.

Subject:- APPEAL NO. [REDACTED] RIFFAT ALI VS POLICE DEPARTMENT.

Sir,

I am directed to forward herewith a certified copy of judgement dated 25.8.2016 passed by this Tribunal in the subject appeal for compliance and further necessary report thereof may also be sent to this Tribunal for perusal of Hon'ble Chairman.

EW
above.

REGISTRAR

KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR.