

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
AT CAMP COURT SWAT.

Service Appeal No.800/2016

Date of Institution ... 29.07.2016

Date of Decision ... 02.09.2019

Parvaiz Khan S/O Abdur Rehman, Subject Specialist (BPS-17) (Pak-Studies) R/O Village Shalbandi, Tehsil Gagra, District Buner, Presently Serving at GHS Dewana Baba as Principal. ... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Peshawar and 208 others. ... (Respondents)

MR. MUSHTAQ AHMAD KHAN,
Advocate

--- For appellant.

MIAN AMIR QADAR,
District Attorney

--- For respondents

MR. SAJID UR REHMAN,
Advocate

--- For respondent no.05

MR. AHMAD HASSAN,
MR. MUHAMMAD HAMID MUGHAL

--- MEMBER(Executive)
--- MEMBER(Judicial)

JUDGMENT

AHMAD HASSAN, MEMBER:- Arguments of the learned counsel for the parties heard and record perused.

ARGUMENTS.

02. Learned counsel for the appellant argued that he was appointed as SET vide notification dated 24.05.1995. In 1999 respondent no.3 invited applications from all SETs having qualification of M.A/MSc to consider for promotion against the post of S.S and the appellant applied for the said post but was ignored by the respondents for unknown reasons. Again applications were sought for holding DPC of eligible SETs for promotion to the post of S.S vide letter dated 23.09.2002 and despite

submission of application his name was not considered by the respondents. It compelled the appellant to file service appeal in this Tribunal, which was decided vide judgment dated 25.11.2006 in his favor. However, he was given promotion with immediate effect i.e 01.01.2008 instead of due date. He again invoked the jurisdiction of this Tribunal by filing service appeal no. 737/2008 decided on 22.12.2008 with directions to the respondents to antedate the promotion of the appellant. Vide notification dated 12.11.2012 the appellant was granted promotion w.e.f 17.02.2013 instead of 31.08.2000. On the other hand the department gave promotion to Mr. Jahangir whose name was reflected at serial no. 377 of the seniority list w.e.f 31.08.2000 despite being junior to the appellant. Thereafter in the year 2013 the respondents issued a seniority list of S.S/Headmasters (M) (BPs-17) in which again respondent no. 4 and 5 were placed senior to the appellant. He filed departmental, appeal which remained un-answered and thereafter service appeal no. 1460/2013 was filed in this Tribunal. This Tribunal vide judgment dated 09.02.2016 remanded the case back to the respondents for decision afresh. Vide impugned order dated 04.07.2016 his departmental appeal was rejected, hence, the present service appeal. Seniority list has not been firmed up in accordance with law and rules.

03. Learned Deputy District Attorney argued that judgment of this Tribunal dated 22.12.2008 was implemented in letter and spirit through order dated 12.11.2012 and seniority was assigned to the appellant w.e.f 17.02.2003 as per prayer service appeal no. 738/2008. On the other hand respondent no.5 was granted promotion w.e.f 31.08.2000 instead of 01.01.2008 in compliance of judgment of this tribunal dated 08.10.2009 rendered in service appeal no. 291/2009. Relief sought by the appellant has already been granted to him. When the appellant filed service appeal no. 1460/2013 in this Tribunal, the matter was remanded to the

respondents vide judgment dated 09.02.2016 with directions to decide the issue on merit within a period of three months. Accordingly his departmental representation was rejected vide order dated 04.07.2016.

04. Learned counsel for private respondent no.5 relied on arguments advanced by the learned DDA.

CONCLUSION.

05. Through the present service appeal, the issue of assigning due place in the seniority list has been agitated by the appellant. He was appointed as SET vide order dated 24.05.1995. Despite being eligible, he was not considered for promotion against the post of S.S by the respondents on many occasions, therefore, it compelled him to invoke the jurisdiction of this Tribunal by way of filing service appeal. Initially as a sequel to the judgment of this Tribunal dated 25.11.2006 promotion was granted to him with immediate effect i.e 01.01.2008 instead of due date. For redressal of his grievance he filed service appeal no. 738/2008 decided vide judgment dated 22.12.2008, wherein directions were conveyed to the respondents to antedate his promotion from the due date. This order was complied with by the respondents by antedating his promotion w.e.f 17.02.2003 vide order dated 12.11.2012. It is further clarified that it was in accordance with the prayer of the appellant in the consider service appeal.

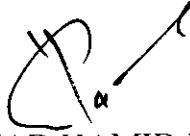
06. As regards the claim of the appellant that Mr. Jahangir Khan was promoted w.e.f 31.08.2000 despite being junior to him. The record revealed that the respondents acted on the directions of this Tribunal contained in judgment dated 08.10.2009 passed in service appeal no. 291/2009. The respondents challenged this judgment in the august Supreme Court of Pakistan but was dismissed. The record

thrashed out so far was sufficient to confirm that the appellant was treated according to law and rules and no lacuna or deficiency on the part of respondents was noticed.

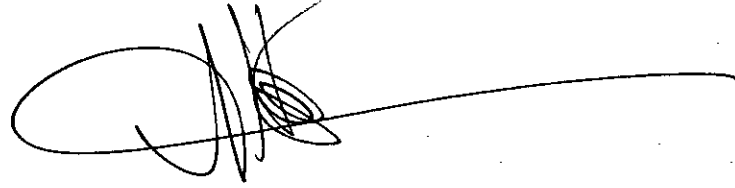
07. When the seniority list of S.S dated 13.02.2013 was published, the name of the appellant was reflected at serial no. 651 and showed junior to private respondent no.4 who was placed at serial no. 650 and private respondent no.5 at serial no. 377. He agitated his grievances through a departmental appeal which according to the respondents was rejected vide order dated 19.12.2013 but copy of the same was not available on the case file. It resulted in filing of service appeal no. 1460/2013 decided on 09.02.2016 with the directions to the respondents to decide the issue within three months and finally his departmental appeal was rejected vide order dated 04.07.2016 followed by the present service appeal.

08. It has been observed that Mr. Jehangir Khan was granted seniority w.e.f 31.08.2000 instead of 01.01.2008 in compliance of judgment of this Tribunal dated 08.10.2009. Similarly promotion of the appellant was also antedated w.e.f. 17.02.2003 again on the strength of a judgment of this Tribunal as already highlighted in the precedings paras. The appellant is trying to hoodwink this Tribunal by agitating the matter that has already been resolved/settled by this Tribunal. To further strengthen our view point, attention of learned counsel was invited to notification dated 22.12.2012 through which his promotion was antedated w.e.f 17.02.2003 and why he kept mum on the same for such a long time. In case he was not satisfied with the above dispensation the same should have been challenged in this Tribunal, however, he was unable to give any satisfactory response.

09. As a sequel to the above, the instant appeal is dismissed. Parties are left to bear their own costs. File be consigned to the record room.



(MUHAMMAD HAMID MUGHAL)
Member



(AHMAD HASSAN)
Member
Camp court Swat

ANNOUNCED

02.09.2019

02.07.2019

Appellant in person present. Mian Amir Qadir, DDA for respondents present. Arguments could not be heard due to general strike of the Bar. Adjourn. Case to come up for arguments on 02.09.2019 before D.B at camp court Swat.


Member


Member
Camp Court Swat


Order

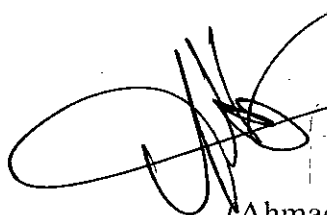
02.09.2019

Counsel for the appellant present. Mian Ameer Qadir, DDA for official respondents and counsel for private respondent no.5 present. Arguments heard and record perused.

Vide our detailed judgment of today of this Tribunal placed on file, the appeal is dismissed. Parties are left to bear their own cost. File be consigned to the record room.

Announced:
02.09.2019

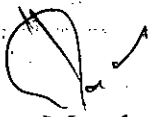

(Muhammad Hamid Mughal)
Member


(Ahmad Hassan)
Member
Camp Court Swat

06.05.2019


Learned counsel for the appellant and Mr. Mian Amir Qadir learned District Attorney alongwith Fazal Subhan SO present. Representative of the respondents submitted reply. Learned District Attorney seeks adjournment for arguments. Adjourn. To come up for arguments on 10.06.2019 before D.B at Camp Court, Swat.

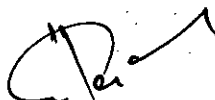

Member


Member
Camp Court, Swat.

10.06.2019

Appellant alongwith his counsel and Mian Ameer Qadir learned District Attorney alongwith Mr. Fazle Subhan, Section Officer (Litigation) for the respondents present. Partial arguments heard. Learned District Attorney requested to properly assist this Tribunal on the issue that as to whether the private respondent No. 5 namely Jehangir Khan is senior to appellant. In order to reach at the proper conclusion, representative of the department is directed to furnish appointment orders of the appellant as well as private respondent No. 5 as SET. Adjourn. To come up for record/additional document and arguments on 02.07.2019 before D.B at Camp Court Swat.


(M. Amin Khan Kundi)
Member
Camp Court Swat


(M. Hamid Mughal)
Member
Camp Court Swat


800/2016


04.03.2019

Appellant in person and Mian Amir Qadar, for the respondents present.

Learned District Attorney states that in pursuance to order dated 04.09.2018 the instructions from respondents are required while the appellant requests for adjournment due to non-availability of his learned counsel.

Adjourned to 03.04.2019 on which date the matter shall be argued in view of order dated 04.09.2018 at camp court, Swat.

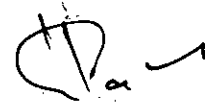

Member

Chairman
Camp Court, Swat 

03.04.2019

Learned counsel for the appellant present. M/S Toseef Ahmad Litigation Officer and Fazal Subhan SO representatives of the respondent department present and seek adjournment to furnish reply/explanation in compliance with the order dated 04.09.2018 of this Tribunal. Adjourned to 06.05.2019 before D.B at Camp Court Swat.


Member


Member
Camp Court, Swat

10.01.2019

Petitioner alongwith his counsel present. Mr. Mian Ameer Qadir, District Attorney for the respondents present. Arguments on restoration application heard. Record reveals that the main service appeal of the petitioner was dismissed in default on 06.12.2018 and the present restoration application has been filed by the petitioner on 10.12.2018. The application is well within time therefore, the same is accepted and the appeal is restored. To come up for proceeding already fixed in the main service appeal on 04.03.2019 at Camp Court Swat. The main service appeal of the appellant be also requisitioned for the date fixed.

04.03.2019

Appellant in person and ~~M. Amin Khan~~ (M. Amin Khan) for the respondents present.

MA
Member
Camp Court Swat

Learned District Attorney states that in pursuance to order dated 04.09.2018 the instructions from respondents are required while the appellant requests for adjournment due to non-availability of his learned counsel.

Adjourned to 03.04.2019 on which date the matter shall be argued in view of order dated 04.09.2018 at camp court, Swat.



Member

Chairman
Camp Court, Swat

FORM OF ORDER SHEET

Court of _____

Misc. Application No. 434/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	10/12/2018	The application for restoration of appeal no. 800/2016 submitted by Mr. Pervez Khan through Mr. Mushtaq Ahmad Khan Advocate may be entered in the relevant Register and put up to the Court for proper order please.
2-	24/12/18	<p style="text-align: right;"> REGISTRAR</p> <p>This Misc. application be put up before Touring S. Bench on <u>10-01-2019</u> at <u>Camp Court Swat</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

S.A NO 800 / 2016

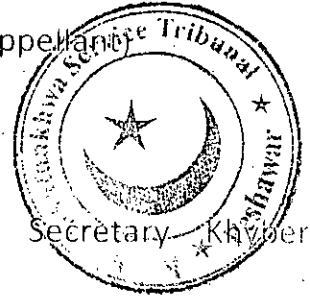
Khyber Pakhtunkhwa
Service Tribunal

Case No. 774
Date 29-7-16

Parvaiz Khan S/O Abdur Rehman Subject specialist B.P.S-17 (Pak-Studies)

R/O Village Shalbandi, Tehsil Gagra, District Buner, presently Serving at GHS
Dewana Baba as principle (Appellant)

VERSUS



1. Govt of Khyber Pakhtunwa through Chief Secretary—Khyber Pakhtunkhwa, at Peshawar.
2. Secretary to Govt of K.P.K, Elementary and Secondary Education Khyber Pakhtunwa, at Peshawar.
3. Director Elementary and Secondary Education Khyber Pakhtunwa, at Peshawar.
4. Muhammad Nabi Subject Specialist B.P.S-18 (Pak-Studies) presently serving as V.P GHS Karman.
5. Jehangir Khan Subject Specialist B.P.S-17 (Pak-Studies) presently R/O Haripur presently serving as S.S (PS GC MHSS No. 1 Haripur).
6. Shaukat Rehman R/O Karak, presently serving as S.S, P.S B/18GHSS No.1 Kohat.
7. Changeez Khan R/O Peshawar presently serving as S.S GHSS No. 2 Peshawar Canntt:
8. Mr. Majeebullah M.Sc, B.Ed Peshawar S.S Stat B/18 GHSS No.1 Peshawar City
9. Mr. Khurshid Alam M.Sc, B.Ed Karak S.S Stat B/18 GHSS Zamdara Dir (Lower)
10. Sana Ullah M/A B.Ed Dir Lower S.S Stat B/18 GHSS Bugra Karak
11. Abdul Nawaz M/A , B. Ed Bannu S.S Eng B/18 GHSS Zamdara Dir (Lower)
12. Abdur Rahman M.Sc, B.Ed Bannu S.S Eng B/18 GHSS Hakim Haveli Bannu

10-2-2017
Private
Respondents
EX-PARTE

Filed to-day

Registrar

29/7/16

Re-submitted to-day
and filed.

Registrar

8/8/16

ATTESTED

Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Appeal: 10-12-78
 Number of Words: 800
 Copying Fee: 6.00
 Urgent: 2.00
 Total: 8.00
 Name of Copyist: [Signature]
 Date of Completion of Copy: 10-12-78
 Date of Delivery of Copy: 10-12-78

Certified to be true copy
 Peshawar
 District & Sessions Judge
 Service Tribunal, Peshawar

ANNOUNCED 06.12.2018

Member [Signature]

Member [Signature]
Camp Court Swat

Appellant absent. Learned counsel for the appellant
 absent. Mr. Usman Ghani learned District Attorney for the
 respondents present. Case called for several times but no one
 appeared on behalf of the appellant. Consequently the present
 service appeal is dismissed in default. No order as to costs. File
 be assigned to the record room.

06.12.2018

Appeal No. 800/2016
 Faraz Khan vs Govt



Camp Court Swat

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

Restoration Application No = 434
Pervez Khan

Khyber Pakhtukhwa
Service Tribunal

Diary No. 2229

Dated 10-12-2018

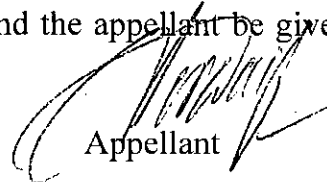
versus

Through Chief Secretary KPK, Peshawar and others.

APPLICATION FOR RESTORATION OF THE APPEAL NO. 800 OF 2016


1. That the captioned appeal had been preferred before the worthy tribunal and was at the stage of final arguments.
2. That the titled appeal was fixed for 05-11-2018, but due to retirement of the chairman of this worthy tribunal, the tribunal was non functional. Hence the appeal couldn't be heard.
3. That the appellant have now came to know that the appeal of the appellant have been dismissed due to non appearance of the appellant or his counsel despite the fact that no notice or summon have been issued to the appellant.
4. That due to non communication of any notice or summon it was not possible for the appellant to have appeared before this worthy tribunal.

It is therefore, kindly prayed that on acceptance of this application the captioned appeal may kindly be restored on its original number and the appellant be given opportunity to appear and argue his appeal.


Appellant

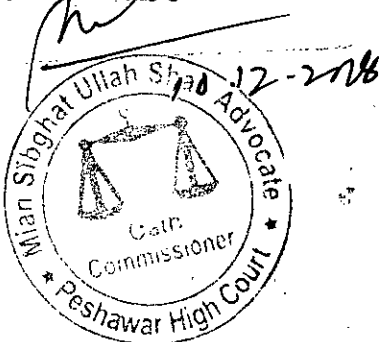
Through

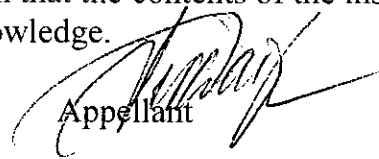
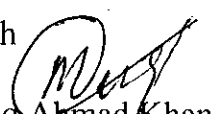
Dated 10-12-18


Mushtaq Ahmad Khan,
Advocate

Affidavit: I solemnly affirm and declare on oath that the contents of the instant application is true and correct to the best of my knowledge.

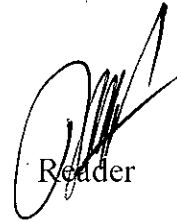
ATTESTED




Appellant
Through

Mushtaq Ahmad Khan,
Advocate

05.11.2018

Due to retirement of the Hon'ble Chairman Service Tribunal is incomplete. Tour to Camp Court Swat has been cancelled. To come up for the same on 05.12.2018 at camp court Swat.



Reader

05.12.2018

Appellant absent. Mr. Usman Ghani learned District Attorney present. Case called but none appeared on behalf of appellant. Adjourn. To come up for arguments on tomorrow i.e. on 06.12.2018 before D.B at camp court Swat.



Member




Member
Camp Court, Swat

06.12.2018

Appellant absent. Learned counsel for the appellant absent. Mr. Usman Ghani learned District Attorney for the respondents present. Case called for several times but no one appeared on behalf of the appellant. Consequently the present service appeal is dismissed in default. No order as to costs. File be consigned to the record room.



Member



Member
Camp Court Swat

ANNOUNCED

06.12.2018

Appeal No. 800/2016
Pervaiz Khan vs Govt

04.09.2018

Appellant Pervaiz Khan in person alongwith his counsel Mr. Mushtaq Ahmad, Advocate present. Mr. Usman Ghani, District Attorney present. No authorize representative on behalf of the respondents present.

During the course of arguments and perusal of record, one thing is clear and admitted that the appellant alongwith the contested respondent no.4 and 5 were held entitled to antedated promotion from the time when a vacancy of S.S was available. In view the orders of this Tribunal, the appellant and respondent no.4 were granted promotion w.e.f 17.02.2003 whereas respondent no.5 who was junior in the seniority list of SET's as his name appears at Sr. 53, the respondent gave him promotion w.e.f 31.08.2000 but from the comments, it is not clear as to why and for what reason, this antedated promotion was not given to the appellant being senior to respondent no.5 namely Jehangir Khan. No doubt, the respondents made a failed attempt to justify the grant of promotion to the Jahangir Khan and strange enough, even the judgments of this Tribunal have been referred to in the impugned letter dated 04.07.2016 but the same is totally against the record as again it is no where mentioned in the said letter as to why Jehangir Khan who was/is junior to the appellant, was given promotion w.e.f 31.08.2000. At this stage, the learned District Attorney requested that this query be asked from the respondents and made request for adjournment. Granted. As such, respondents no. 2 and 3 are directed to explain as to why the appellant was deprived from the promotion in the year 2000 and why the junior person i.e. respondent no.5 was given promotion w.e.f 31.08.2000. This reply/explanation should be submitted through responsible office not below the rank of BPS-17 on 05.11.2018 before D.B at camp court Swat.



Member




Chairman
Camp Court Swat

05.04.2018

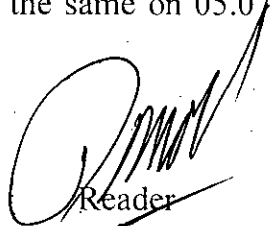
Appellant in person and Mr. Usman Ghani, District Attorney for the respondents present. Appellant seeks adjournment on the ground that his counsel is not available today. Granted. To come up for arguments on 10.05.2018 before the D.B at Camp Court, Swat.


Member


Chairman
Camp court, Swat

09.05.2018


The Tribunal is non-functional due to retirement of the Worthy Chairman. To come up for the same on 05.07.2018 before the D.B at camp court, Swat.


Reader

05.07.2018

Appellant parvaiz Khan in person present. Mr. Muhammad Jan learned Deputy District Attorney for the respondents present. Appellant requested for adjournment as his counsel is not in attendance. Adjourned. To come up for arguments on 04.09.2018 before D.B at camp court Swat.

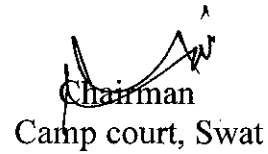

Member


Chairman
Camp Court, Swat

04.12.2017

Junior to counsel for the appellant and Addl. AG for the respondents present. Rejoinder submitted. Senior counsel for the appellant is not in attendance. Seeks adjournment. Granted. To come up for arguments on 31.01.2018 before the D.B at camp court, Swat.


Member

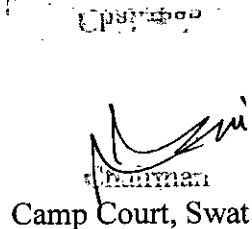

Chairman
Camp court, Swat

31.01.2018

Counsel for the appellant present and Addl. AG for the respondents present. Learned Addl. AG seeks adjournment incomplete record on file. Adjourned. To come up for arguments on 07.03.2018 before D.B at Camp Court, Swat.

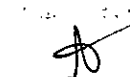
Member




Chairman
Camp Court, Swat

07.03.2018


Counsel for the appellant and Mr. Usman Ghani, District Attorney for the respondents present. Learned District Attorney seeks adjournment due to incomplete file. Granted. To come up for arguments on 05.05.2018 before the D.B at camp court, Swat.


Member


Chairman
Camp court, Swat

06.04.2017

Appellant in person and Mian Amir Qadar, Government Pleader for official respondents No. 1 to 3 present. Representative of the respondent-department is not in attendance today, therefore, fresh notice be issued to the respondents for written reply/comments. To come up for written reply/comments on behalf of official respondents on 08.06.2017 before S.B at Camp Court Swat.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER
Camp Court Swat.


08.06.2017

Since the tour programme for the month of June, 2017 to camp court Swat has been cancelled by the Worthy Chairman, therefore, to come up for the same on 10.08.2017 at camp court, Swat. Notices be issued to the parties for the date fixed accordingly.


Registrar

10.08.2017


Appellant in person and Mian Amir Qadar, DDA alongwith Muhammad Saeed Khan, SS for the respondents present. Written reply submitted. The appeal is assigned to D:B for rejoinder, if any, and arguments for 04.12.2017 at camp court, Swat.


Chairman
Camp court, Swat

08.12.2016

Learned counsel for the appellant argued that the appellant is serving as Subject Specialist. That earlier the appellant had submitted service appeal No. 1460/2013 regarding his seniority which was accepted by this Tribunal vide judgment dated 09.02.2016 and respondents were directed to decide the matter of seniority of the appellant within a period of three months. That vide impugned order dated 04.07.2016 the respondents have decided the issue relating to the seniority of the appellant but the appellant shown junior to private respondents which order of the respondents is against facts and law and liable to be set aside.

Points urged need consideration: Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 10.02.2017 before S.B at camp court, Swat.


Chairman
Camp court, Swat


10.02.2017

Appellant in person and Mian Amir Qadar, GP for the official respondents present. Requested for adjournment. None present on behalf of private respondents despite proclamation in Daily "Aaj" dated 24.12.2016. Proceeded ex-parte. To come up for written reply of official on 06.04.2017 before S.B at camp court, Swat.


Chairman
Camp Court, Swat.

06.10.2016




None present for the respondents. Notices have not been issued to appellant and his counsel despite directions. Warning be given to concerned Moharrir of the Court. Notices be issued to appellant and his counsel. To come up for preliminary hearing on 08.12.2016 at camp court, Swat.


Chairman
Camp Court, Swat

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 800 /2016

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	08/08/2016	<p>The appeal of Mr. Parvaiz Khan resubmitted today by Mr. Mushtaq Ahmad Advocate may be entered in the Institution Register and put up to Learned Member for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	10-08-2016	<p>This case is entrusted to Touring S. Bench at Swat for preliminary hearing to be put up there on. <u>8-09-2016</u></p> <p style="text-align: right;"> MEMBER</p>
	08.09.2016	<p>None present for the appellant. Notices be issued to appellant and his counsel. To come up for preliminary hearing on 06.10.2016 before S.B at camp court, Swat.</p> <p style="text-align: right;"> Chairman Camp Court, Swat.</p>

**BEFORE THE CHAIRMAN SERVICE TRIBUNAL
KHYBER PUKHTUN KHWA PESHAWAR**

**PERVEZ KHAN
VS**

GOVT; OF KPK THROUGH CHIEF SECRETORY KPK & OTHERS

**APPLICATION FOR CONDONATION OF OBJECTION NO 04 AS RAISED BY THE
REGISTRAR SERVICE TRIBUNAL KHYBER PUKHTOON KHWA
PESHAWAR.**

The applicant submits as follows ;


- 1- That the title Appeal was submitted / preferred before the worthy service tribunal KPK Peshawar .
- 2- That beside others objections the Registrar of the worthy tribunal also objected on the non submission of 211 copies for private respondents and directed the appellant to resubmit the appeal after providing the aforesaid copies.
- 3- That in the above mentioned appeal the appellant have challenged the impugned order dated 04/07/2016 and seniority list . Hence the actual contesting parties are the official respondents, 4 & 5 for whom the copies have already been submitted .
- 4- That the appellant is the earning hand of a large family and it is highly inconvenient for him to provide copies for large number of private respondents .
- 5- That the appellant have suffered due to in-action of the official respondents with out his fault and it will amount to injustice if his appeal has rejected on technical grounds .
- 6- The appellant is ready to provide Fee for publication in the print media (newspaper) for information to the respondents hereinabove mentioned.

It is there fore kindly requested that on acceptance of this application the objection No 4 as raised by the registrar service tribunal KPK may kindly by condemned.

Any other relief which this honorable tribunal Deem appropriate in the case may be granted.


Appellant.

Dated 08 /08/2016


Through;

Mushtaq Ahmad Advocate
High Court Office at District
Courts Buner at Daggar.

The appeal of Mr. Pervaiz Khan son of Abdur Rehman Subject Specialist - presently Principal GHS Dewana Baba Buner received to-day i.e. on 29.07.2016 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Copy of seniority list of 2013 mentioned in para-4 of the memo of appeal is not attached with the appeal which may be placed on it.
- 2- Annexure-G of the appeal is illegible which may be replaced by legible/better one.
- 3- Annexures of the appeal may be flagged.
- 4- 211 more copies/sets of the memorandum of appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1207 /S.T.

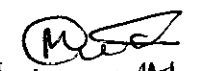
Dt. 29/7 /2016


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Mushtaq Ahmad Adv. Buner.

objection No 1, 2 and 3 have been removed whole application in case of objection^{No} 4 have been submitted on behalf of the appeller. The file is complete and the same may please be put in Court.

Dated 1-8-2-16


Mushtaq Ahmad
Khan Adv.
advocate

BEFORE THE KHYBER PUKHTUN KHWA SERVICE
TRIBUNAL PESHAWAR

S.A NO 800 / 2016

PERVEZ KHAN
Applicant

VERSUS

GOVT; OF Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa at
Peshawar and others.....(Respondent)

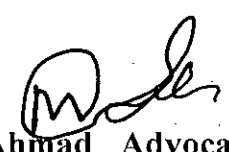
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Dated 28 /08/2016


Petitioner

Through;


Mushtaq Ahmad Advocate
High Court Office at District
Courts Buner at Daggar.

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

S.A NO 800 / 2016

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 774

Dated 29-7-16

Parvaiz Khan S/O Abdur Rehman Subject specialist B.P.S-17 (Pak-Studies)

R/O Village Shalbandi, Tehsil Gagra, District Buner, presently Serving at GHS
Dewana Baba as principle(Appellant)

VERSUS

1. Govt of Khyber Pakhtunwa through Chief Secretary Khyber Pakhtunkhwa, at Peshawar.
2. Secretary to Govt of K.P.K, Elementary and Secondary Education Khyber Pakhtunwa, at Peshawar.
3. Director Elementary and Secondary Education Khyber Pakhtunwa, at Peshawar.
4. Muhammad Nabi, Subject Specialist B.P.S-18 (Pak-Studies) presently serving as V.P GHS Karman.
5. Jehangir Khan Subject Specialist B.P.S-17 (Pak-Studies) presently R/O Haripur presently serving as S.S (PS GC MHSS No. 1 Haripur).
6. Shaukat Rehman R/O Karak, presently serving as S.S, P.S B/18GHSS No.1 Kohat.
7. Changeez Khan R/O Peshawar presently serving as S.S GHSS No. 2 Peshawar Canntt:
8. Mr. Majeebullah M.Sc, B.Ed Peshawar S.S Stat B/18 GHSS No.1 Peshawar City
9. Mr. Khurshid Alam M.Sc, B.Ed Karak S.S Stat B/18 GHSS Zamdara Dir (Lower)
10. Sana Ullah M/A B.Ed Dir Lower S.S Stat B/18 GHSS Bugra Karak
11. Abdul Nawaz M/A , B.Ed Bannu S.S Eng B/18 GHSS Zamdara Dir (Lower)
12. Abdur Rahman M.Sc, B.Ed Bannu S.S Eng B/18 GHSS Hakim Haved Bannu

10-2-2017
Private
Respondents
Ex-parte

Filed to-day
As
Registrar
29/7/16

Re-submitted to -day
and filed.

Registrar

8/8/16

12

13. Muhammad Irfan Ullah M.Sc, B.Ed Hango S.S B/18 GHSS Jahangir
Karak
14. Ajmal Qadir M.A B.Ed Nowshera S.S Eng B/18 GHSS Tamb Charsada
15. Hamid Ullah M.Sc, B.Ed Karak Prl B/18 GHSS Boza Khel Bannu
16. Akhtar Ali M/A B.Ed Swat S.S English B/18 GHSS Fateh Pur Swat
17. Muhammad Alam M.A B/Ed Swat Prl GHS Islam pur Swat
18. Akhtar Abbass M.Sc, B.Ed D.I.Khan Instructor RITE Male D.I.Khan
19. Hakim Ullah M.Sc, B.Ed Bajawar Agency S.S Stat B/18 GHSS Domel
Bannu.
20. Muhammad Islam M.Sc B.Ed Bajawar Agency S.S State GHSS Dir lower.
21. Habib Ali M.Sc, B.Ed Swat S.S Stat B/18 GHSS Barikot Swat.
22. Muhammad Umar M.A, B.Ed Mansehra S.S Eng B/18 GHSS Ghari
Habibullah Mansehra.
23. Amanullah M.Sc, B.Ed D.I. Khan S.S Stat B/18 GHSS Kabangani Sawabi
24. Ashraf Ali M.A B.Ed Swabi S.S Engh B/18 GHSS No. D.I.Khan
25. Muhammad Ibrahim M.A, B.Ed Swat S.S Prl B/18 GHS Totano Banda
Swat
26. Saifullah Khan M.A B.Ed D.I.Khan S.SPRI B/18 GHSS Dalazak Charsada
27. Nawab Khan M.A B.Ed Bannu S.S Eng B/18 GHSS Rama D.I.Khan
28. Muhammad Rafiq M.A, B.Ed Karak PRL B/18 GHSS Panyal D.I.Khan
29. Usman Ghani M.A , B.Ed Karak S.S Eng B/18 GHSS Jahagiray Karak.

30. Shah Jehan M.A, B.Ed Malakand S.S Eng B/18 GHSS Tught Bala Kohat
31. Habib Ullah Khan M.Sc B.Ed Malakand S.S Eng B/18 GHSS Takkaro
Mardan
32. Qayyum Nawaz M.Sc, B.Ed D.I.Khan S.S V.P BS/18 GHSS Umarzai
Charsada.
33. Sayed Amanullah Shah M.A, B.Ed Peshawar S.S B/18 Instructor RIT in
D.I.Khan
34. Habibullah M.Sc B.Ed Bannu S.S place at the Disposal of Director of
Education PATA.
35. Said Muhammad Khan M.A, B.Ed Dir S.S Eng B/18 GHSS Wari Dir
upper
36. Sharif, Ud, Din M.A, B.Ed Dir S.S Eng B/18 GHSS Bughdada Mardan
37. Farman Ali M.Sc B.Ed Swabi S.S physic B/18 GHSS Bamkhel Swabi
38. Muhammad Jalil Khan M.A, B.Ed Lacky S.S PRL B/18 GHSS Daraka Aziz
Khan lacky
39. Akram Said M.A, B.Ed Swat S.S Eng B/18 GHSS Barikot Swat
40. Jehan Zeb M.Sc, B.Ed Karak S.S physics GHSS Warana Karak.
41. Abdus Shakoor M.Sc B.Ed Kohat S.S Stat GHSS No.1 Kohat.
42. Munawar Khan M.Sc B.Ed Charsadda S.S Physics GHSS
Bushera Charsadda.
43. Mir Aslam M.Sc B.Ed Mardan Prl , GHSS Gulmuqam
Malakand.

44. Abdul Ali M.Sc B.Ed Buner S.S Physics GHSS Nawagai
Buner.
45. Bakht Rawan M.Sc B.Ed Dir Lower S.S Physics GHSS
No.Zimdara Dir Lower.
46. Nisar Ahmad M.Sc B.Ed Dir Lower S.S Physics GHSS
Mundai Dir Lower.
47. Fazal Wahab M.Sc B.Ed Buner S.S Bio GHSS Gagra Buner.
48. Abdul Hussain M.A B.Ed Peshawar S.S V.P GHSS khazar
Khawani Peshawar.
49. Qudarat Ali M.Sc B.Ed Karak S.S Stat B/18 GHSS Karak
50. Muhammad Wakil M.Sc B.Ed Karak V.P B/18 GHSS
Gumbat Kohat.
51. Warka Hussain M.Sc B.Ed Aurakzai Agency Place at the
Disposal of Director of Education PATA.
52. Farzand Ali Khan M.Sc B.Ed FR Bannu S.S Stat GCHSS
Bannu.
53. Izat Khan M.A B.Ed Peshawar S.S Eco GHSS No.1
Peshawar City.
54. Muhammad Hamid M.A .Ed Malakand Prl GHSS Fatima
Mardan.
55. Rafiullah Khan M.Sc B.Ed Kohat S.S physics B/18 GHSS
Tough Bela Kohat.
56. Inayatullah Khan M.A B.Ed Swat S.S Eng B/18 GHSS
Shamozai Swat.
57. Noman Ali M.A B.Ed Noshera Prl B/18 GHS Adamzai
Noshera

58. Muhammad Tahir M.A M.Ed Swabi Prl B/18 GHSS
Torlandai Swabi.
59. Amir Sultan M.A B.Ed Swat S.S Eng B/18 GHSS Shahpur
Shangla.
60. Gul Nawab Khan M.A B.Ed Banuu prl GHS Behram Khel
Lucky.
61. Muhammad Ayaz Shah M.A B.Ed Mardan S.S Physics B/
18 GHSS Gagra Buner.
62. Salar Islam Tariq M.A B.Ed Peshawar S.S Pak-Studies
B/18 GHSS No.1 Peshawar Cantt:
63. Muhammad Tahir M.A M.Ed Mardan S.S PS GHSS Islamia
Swabi.
64. Muhammad Salim M.A M.Ed Swat S.S Eng B/18 GHSS
Khuwaza Khela.
65. Shahid Ali M.Sc B.Ed Mardan V.P B/18 GHSS Gujrat
Mardan
66. Ahmad Saeed M.A B.Ed Kohat Prl B/18 GHS Kando Khel
Karak.
67. Munir Khan M.Sc B.Ed Malakand S.S Physics GHSS Ghani
Dherai Malakand.
68. Ihsanullah M.Sc B.Ed Mardan S.S Maths B/18 GHSS
Nagrai Buner.
69. Adul Hamid M/A B/Ed Dir lower V/P B/18 GHSS Sammar Bagh Dir
Lower
70. Ghulam Daud Khan M/Sc B/ED Bannu Prt; GHS Hassan Khel jaffar Khan
Bannu
71. Hamid Hussain M/A B/Ed Kohat V/P B/18 GHSS Usterzai Payan Kohat
72. Zain Ullah M/A B/Ed Peshawar SS Eco B/18 GHSS Pir Pai Nowshera
73. Khurshid Ali Khan M/A B/Ed FR Bannu Place the disposal of Director of
Edu FATA
74. Malak Muhammad Naeem M/A B/Ed Nowshera instructor B/18 RITE
(M) Peshawar
75. Shahbaz Muhammad M/Sc B/Ed Malakand SS Maths GHSS Dheri
Julogram Malakand
76. Tariq Farooq M/Sc B/Ed Mansehra Prl B/18 GHS Data Mansehra

77. Farid Khan M/A B/Ed Dir SS Stat B/18 GHSS Ouch Dir (Lower)
78. Fazal Rabbi M/Sc B/Ed Malakand SS Physics B/18 GHSS sherpao charsada
79. Younis Ali Khan M/Sc B/Ed Mardan SS Maths B/18 at GHSS Takkar Mardan
80. Lal Wadood MSc B/Ed Mardan Prl: B/18 GHSS Garyala Mardan
81. Mehboob Ur Rehman MSc B/Ed Karak SS Eco B/18 GHSS Ustarzai Kohat
82. Muzafar Shah MSc B/Ed Dir SS Phy GHSS NO.4 Kakshal Peshawar City
83. Fayaz Ahmad MSc B/Ed Charsada SS Stat B/18 GHSS Dosehra Charsada
84. Muhammad Rahim MSc B/Ed FR Bannu Prl: B/18 GHS Jani Khel Bannu
85. Muhammad Ghulam MSc B/Ed Kurram Agency Place at the disposal of Director of Edu FATA
86. Syed Latif Shah MSc B/Ed Hangu Prl: B/18 GCMHS No.4 Kohat
87. Khan Badshah MSc B/Ed Mardan SS Maths B/18 GHSS Dheri likepandi Mardan
88. Said Bad Shah M/A B/Ed Mohmand Agency SS Maths B/18 GHSS Nawagai Buner
89. Javid Akhtar M/A B/Ed Abbottabad SS Maths B/18 GHSS Bagra Haripur
90. Amin ul Haq M/A B/Ed Malakand SS PS B/18 GHSS Dheri Likpani Mardan
91. Nadeem Sultan M/Sc B/Ed Abbottabad Prl: B/18 GHSS Pawa Abbottabad
92. Khan Gul Jadoon M/Sc B/Ed Abbottabad SS Maths B/18 GHSS Boi Abbottabad
93. Faizur Rehman M/Sc B/Ed Battagram SS Bio B/18 GHSS Behali Mansehra
94. Hazrat Umar M/Sc B/Ed Charsadda SS Bio B/18 GHSS Sherpao Charsadda

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95. Muhammad Anwar M/A B/Ed Peshawar Instructor PITE Peshawar
96. Abdur Rashid M/Sc M/Ed Swabi SS Bio GHSS Bamkhel Swabi
97. Muhammad Ayaz Khan M/Sc B/Ed Bannu Instructor B/18 RITE (M)
Ghoriwala Bannu
98. Zard Ali Khan M/A B/Ed Peshawar Principal B/18 GHS Aza Khel Mattani
99. Habib Ur Rehman M/Sc B/Ed Karak SS Bio B/18 GHSS Ismail Khel Bannu
100. Niamat Ullah M/Sc B/Ed Peshawar SS Bio B/18 Chamkani Peshawar
101. Gulfam Iqbal M/A B/Ed Kohat SS Pak Studies B/18 GHSS Togh Bala
Kohat
102. Khizar Hayat M/Sc B/Ed Nowshera VP B/18 GHSS Jallozai Nowshera
103. Ihsan Ullah M/A B/Ed Malakand SS Pak Studies GHSS B/18 Takkar
Mardan
104. Hayat Muhammad M/A B/Ed Charsadda V/P GHSS Dakki Charsadda
105. Muhammad Younas M/A B/Ed Abbottabad SS PS GHSS Khanpur
Ayubia
106. Raza Muhammad M/A B/Ed Swabi SS Econ: B/18 ismaila Swabi
107. Mehrab Gul M/A B/Ed Karak SS Eco B/18 GHSS jandrai Karak
108. Sair Ullah Shah M/A B/Ed Bannu Prl B/18 GHS Jandu Khel Bannu
109. Wali Ullah M/A B/Ed Karak SS Pak Studies GHSS Wrana Karak
110. Jehanzeb M/A B/Ed Haripur VP B/18 GHS No.2 Haripur
111. Mahboob Khan M/A B/Ed NWA Place at the disposal of Director of
Educ FATA
112. Muhammad Shafqat M/A B/Ed Mansehra Prl: B/18 GHS Talhatta
Mansehra
113. Sajid Aziz M/A B/Ed Haripur Instructor B/18 RITE(M) Haripur
114. Israj Ali M/A B/Ed Malakand SS P/S GHSS Tamab Charsadda
115. Mian Zia Ud Din M/Sc B/Ed Nowshera Prl: B/18 GHS Talhatta
Mansehra
116. Daud Ur Rehman M/A B/Ed Charsadda SS Eng B/18 GHSS Dosehra
Charsadda

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117. Gul Islam M/Sc B/Ed Karak SS Eng B/18 GHSS Jandrai Karak
118. Sher Habib M/A B/Ed Dir Lower SS Maths B/18 GHSS Samar Bagh Dir Lower
119. Sher Ali Khan M/A B/Ed Dir Lower SS Eco BS /18 GHSS Khal Dir Lower
120. Tayyib Shahzad M/A B/Ed Haripur SS Pak Study B/18 GCMHSS NO.1 Haripur
121. Khalil Ur Rehman M/A B/Ed FR Bannu SS B/18 GCHS Bannu
122. Norani Gul M/Sc B/Ed malakand Prl B/18 GHS DALAZAK Charsadda
123. Akhtar Waheed M/A B/Ed Kohat Instructor B/18 RITE (m) Kohat
124. Azim Khan M/Sc B/Ed Swat SS Physics B/18 GHS Shamoza Swat
125. Iqbal Ali Shah M/A B/Ed Bannu SS Pak Studies B/18 GCHSS Bannu
126. Muhammad Sadiq M/A B/Ed FR Bannu SS Pak Studies GHSS Hakim Haveed Bannu
127. Muhammad Riaz Khan M/A B/Ed NWA Place at the disposal of director of Edu FATA
128. Jamil Ahmad MA B/Ed D.I Khan SS Pak Studies B/18 GHSS Shah Salim Karak
129. Chen Zeb M/A B/Ed Abbottabad SS PS B/18 GHSS Bandi Dunda Abbottabad
130. Muhammad Daraz Khan M/A B/Ed Karak Prl B/18 GHS Ahmadi Banda Karak
131. Nizar Ali M/Sc B/Ed Charsadda SS Phy B/18 GHSS Tarnab Charsadda
132. S/Muhammad Tariq M/A B/Ed Charsadda prl GHSS Matta Mughal Khel Charsadda
133. Alam Zeb Khan M/A B/Ed Dir Lower SS PS B/18 GHSS Khal Dir Lower
134. Muhammad Aslam M/A B/Ed Charsadda Place at the disposal of director of Edu FATA
135. Nasrullah Zaib M/A B/Ed Buner SS Chem: GHSS B/18 Gadazai Buner
136. Zafar Javaid Quraishi M/A B/Ed Mansehra SS Chem: B/18 GHSS Behali Mansehra

(9)

137. Zulfiqar Ali M/A B/Ed Nowshera SS Eng GHSS Kheshgi payan
Nowshera
138. Shah/e/Room M/A B/Ed Mardan SS Eco B/18 GHSS dheri lakpani
Mardan
139. Muhammad Mubashir M/A B/Ed Mansehra SS Eco: B/18 GHSS Bahali
Mansehra
140. Saeed Ahmad M/A B/Ed Mansehra SS Pak Studies B/18 GHSS Bafa
Mansehra
141. Iftikhar Ahmad mansehra SS PS B/18 GHSS NO/1 Mansehra
142. Khalid Ahmad M/Sc B/Ed Kohat V/P B/18 GHSS Shakardara Kohat
143. Muhammad Shafiq M/A B/Ed Kohat SS Pak Studies B/18 GCHSS
Kohat
144. Abdullah Khan M/Sc B/Ed NWA SS CHEM B/18 GHSS Dara Pezu Lakki
145. Muhammad Ali M/A B/E D.I Khan VP B/18 GHSS No.2 DI Khan
146. Almas Khan M/Sc B/Ed Bannu SS Chem B/18 GCHSS Bannu
147. Irshad Ahmad M/Sc B/Ed Swabi SS Chem: B/18 GHSS Dheri Likpani
Mardan
148. Gul Aslam M/A B/Ed Bannu SS Chem: B/18 Dheri Julogram Mkd
149. Hidayat Ur Rehman M/Sc B/Ed Malakand SS Chem: B/18 Chamkani
Peshawar
150. Muhammad Jamshaid M/Sc B/Ed Kohat SS Chem: B/18 GHSS Dheri
Julogram Mkd
151. Ihsan Ul Haq M/Sc B/Ed Mansehra SS Chem B/18 GHSS Chamkani
Pesh;
152. Zahid Hussain M/Sc B/Ed Orkazi Agency Prl B/18 GHS Chattar Plan
Mansehra
153. Abdul Latif M/A M/Ed Charsadda SSS GHSS No. 3 Peshawar City
154. Sharif Ullah Khan M/Sc B/Ed Lakki SS P/Studies GH/SS No/3 Peshawar
City

4/0

155. Farzand Ali M/Sc B/Ed D.I Khan SS Chem B/18 GHSS serai Nurang Lakki
156. Riaz Hussain M/Sc B/Ed Dir Lower prl B/18 GHSS Adam Dheri Dir lower
157. Fazal Muhammad M/Sc B/Ed Shangla SS Chem B/18 GHS Shahpur Shangla
158. Muhammad /Sher Ali Khan M/Sc B/Ed Swat SS Chem B/18 GHSS Khwaza khaila Swat
159. Ghazi Marjan M/Sc B/Ed Karak SS Chem: B/18 GHSS Togh Bala Kohat
160. Fida Muhammad M/Sc B/Ed Peshawar SS Chem B/18 GHSS Jallozai Nowshera
161. Hidayat Ullah Khan M/Sc B/Ed Bannu Prl: B/18 GHSS Harama Tala Lakki
162. Muhammad Sadiq M/Sc B/Ed Peshawar SS Pak Studies B/18 GHSS No.2 Peshawar Cantt
163. Inayat Ullah Khan M/A B/Ed DI Khan SS PS B/18 GHSS Ramjak D.I Khan
164. Abdul Qayum Khan M/A B/Ed Lakki SS PS B/18 GHSS Utmanzai Charsadda
165. Akhtar Hussain M/A B/Ed FR Bannu SS PS GHSS Serai Nurang Lakki
166. Suhrab Khan M/A B/Ed Mansehra SS PS B/18 GHSS Lasan Mansehra
167. Sherzada M/A B/Ed Swabi SS H/C B/18 GHSS Bam Khel Swabi
168. Fazal Rehman M/A B/Ed Abbottabad Prl: B/18 GHSS Mirpur Abbottabad
169. Mehboob Ilahi M/A B/Ed Haripur SS H/C B/18 GHSS Kot Najeebullah Haripur
170. Muhammad Zareen Khan M/A B/Ed haripur Instructor RITE Male Haripur
171. Abbas Gul M/A B/Ed Mardan V/P GHSS Takht Bhai mardan

172. Mustafa Khan M/A B/Ed Dir lower SS H/Pol Sc: GHSS Toda Cheena Dir
Lower
173. Abdul Malik M/A B/Ed FR Peshawar SS H/Pol Sc: GHSS Chamkani
Peshawar
174. Muhammad iddres Khan M/A B/Ed Haripur SS H/Pol: Sc: GHSS No.1
Haripur
175. Hakam Khan M/A B/Ed Lakki SS H/Pol: Sc GHSS Muryali DI Khan
176. Abdullah Shah M/A B/Ed Peshawar Prl: GHSS Takht Abbad Peshawar
177. Muhammad Parvez M/A B/Ed Malakand SS H/P Sc: GHSS dere
Jaligram Mkd:
178. Muhammad Siraj M/A B/Ed Swat SS H/C B/18 GHSS Khawaza Khela
Swat
179. Abdur Rehman M/A B/Ed Mardan SS Islamiat B/18 GHSS Ismailia
Swabi
180. Mir Haider M/A B/Ed Abbottabad SS ISI B/18 GHSS Kot Njibullah
Haripur
181. Muhammad Yaqub M/A B/Ed karak SS Islamiat B/18 GHSS Warana
Karak
182. Kifayat Ullah M/A B/Ed Bannu SS islamaiat B/18 GHSS NO 1 Peshawar
Cantt
183. Mr Amal Shah B/A B/Ed Nowshera prl: B/18 GHSS Bara Banda
Nowshera
184. Ghulam Baqi Jan B/A B/Ed Lakki VP B/18 GHSS No3 DIK
185. Nasrullah M/Sc B/Ed Bannu SS Bio B/18 GHSS Ramak DIK
186. Gul Yar Khan SS(Ec:) Swat SS Eco B/18 GHSS Fateh pur Swat
187. Mr Hameed Ullah B/A B/Ed Bannu Pl: GHS Titer Khel Lakki
188. Mr Ismatullah B/A B/Ed Bannu Pl: GHS No.2 Lakki
189. Mr Shafiful Haq B/A B/Ed Dir lower V/P GHS Khanpure Dir Lower
190. Muhammad shoaib M/A B/Ed FR Bannu Pl: GHS Behazadi Chicket Kot
Kohat

12

191. Awalyaz s/o Abbas Gul SS economics FR Bannu SS B-18 DCTE Abbottabad
192. Hafeez Ullah Khan s/o Mian Khan SS Eco: FR Bannu SS GHSS no.1 peshawar cantt
193. Ihsan Ud Din SS Urdu SS GHSS No.3 peshawar Cantt
194. Bahadur Zaman Hangu SS DCTE Abbottabad
195. Qazi Muhammad SS islamiat Abbottabad SS Eco GHSS No.1 Peshawar Cantt
196. Shabeer Ahmad M/A B/Ed Peshawar SS Urdu GHSS No.3 Peshawar
197. Safdar Khan M/A B/Ed Peshawar SS H/C GHS Doaba Hangu
198. Muhammad Waheed M/A M/Ed M/phil Nowshera Principal B-18 GHS Garibabad Tehkal Bala Peshawar
199. Aziz Ul Haq M/A B/Ed Swar Instructor RITE (M) Peshawar
200. Abdul Majid M/A B/Ed Mansehra Dy. District Education Officer (M) Kohistan
201. Malik Khan M/A B/Ed Karak PI: GHS Ghudi qillah Karak
202. Asmat Ullah M/A B/Ed Swat At the disposal of DE (FATA)
203. Khurshid Khan M/A B/Ed Lakki PI: GHS Barkot Haripur
204. Zahid Zaman M/A B/Ed Kohat PI: GHS Karbogha Hangu
205. Shah Zarin M/A B/Ed Dir Upper Instructor RITE (m) Mardan
206. Abdul Qayyum M/A B/Ed kohat PI: GHS Kaghazi Kohat
207. Aman Ullah M/A B/Ed Swabi PI: GHS No.2 Marghuz Swabi
208. Iais Muhammad M/A B/Ed Mardan V/P GCHS Mardan
209. Atiqur Rehman M/A B/Ed Tank Instructor RITE (M) Mardan

Appeal Under Section 4 of the Khyber Pakhtunkhwa, Service Tribunal Act 1974 against the order Dated: 04-07-2016 whereby the Departmental Appeal of the appellant have been rejected after remission by this worthy tribunal.

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Respectfully Shewith!

1. That in the year 1999 the respondent Department invited application from all those SETs who passed their Master (M.A/M.Sc) for consideration of onward promotion as Subject Specialist BPS-17. The appellant having the prescribe qualification applied for the same however 22 SETs, were promoted and the appellant was ignored Despite availability of post. **(copy of the appoint Order Dated 24-05-1995 of the appellant as SET and his M.Sc (Pak-Studies) and M.Ed Degrees are attached as Annexure A, B and C).**
2. That again in the year of 2002 promotion cases of SETs to subject specialist were forwarded but the appellant was once again ignored, therefore the appellant along with others agitated the Matter of their promotion before this worthy tribunal in Service appeal No. 444/2005 which was Disposed off in forever of the appellant vide order dated: 25-11-2006. **(copy of the order Dated 25-11-2006 is attached as Annexure D).**
3. That pursuance to the aforesaid order, the respondent Department promoted the appellant along with respondent No. 4 and 5 to the post of subject specialist (BPS-17) vide promotion order dated: 01-01-2008 but the promotion order was with immediate effected, hence the appellant along with Respondent No. 5 and 2 others again approached this worthy tribunal For anti-dation of their promotions in appeal No. 738/2008, which was accepted vide Judgment and order Dated: 22-12-2008 and the official Respondents were Directed to antedate the promotion of the appellant to the Date on which the vacancies were available for them and when they were eligible for promotion. The appellant also filed implementation petitioner and resultantly the Respondent antedated the promotion of the appellant from 17-02-2003 vide Notification Dated: 12-11-2012. **(copy of the order Dated: 01-01-2008 and Judgment / order Dated 22-12-2008 and Notification Dated 12-11-2012 are attached as Annexure E,F and G).**

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4. That in the year 2013 the Respondent Department issued a Seniority list of Subject specialists / Head Master (Male) BPS-17 however to the grate surprise of the appellant, the Respondent No.4 and 5 were placed at High pedestal of the seniority list, which was challenged by the appellant through Departmental appeal. **(Departmental Appeal and seniority list are attached as annexure H and H1).**
5. That the aforesaid Departmental appeal was not Decided / communicated to the appellant and on expiry of the statutory period the appellant preferred appeal No. 1460 of 2013 before this Honorable Tribunal in which the official Respondents submitted there reply and after hearing the appeal this Honorable Tribunal remitted the case to the Departmental authority with the Directions to look into the case and decide the same in the light of the facts and observations mentioned in the order. **(appeal No. 1460 of 2013, reply of the Respondent , order Dated: 9-2-2016 are attached as Annexure I,J &K).**
6. That the official Respondent have now Decided the case of the appellant mentioned in the preceding pera without taking into consideration law, rules and judgment of this worthy Tribunal hence this appeal on the following Grounds inter-alia:-

GROUNDS

- A. That the impugned order Dated: 04-07-2016 whereby the appeal of the appellant has been rejected / regretted is against law rules and natural - justice. **(order Dated:04-07-2016 attached as Annexure K1).**
- B. That vide judgment / order Dated: 22-12-2008, this tribunal have antedate the promotion of the appellant to the date on which the vacancies were available for him and he was eligible for promotion but the official Respondent with malafide intention and concealed Design antedated promotion of the appellant w.e.f 17-02-2003 while the promotion of his junior (Respondent No.5) have been antedated w.e.f 31-08-2000 pursuance

to the Judgment / order Dated: -8-10-2009 which clearly shows Discrimination and unjustified treatment on the port of official Respondents. **(Judgment / order Dated: 08-10-2009. Attached as Annexure "L".)**

- C. That since the denial of the post of subject specialist to the appellants in due time was on account of fault of the Respondent hence it is incumbent upon the Respondent Department to rectify the mistake allow the appellants his due seniority position as it is established principle of law, that no one should suffer for the fault of the Department / authority.
- D. That placing the private Respondents on high pedestal of seniority List then the appellants is against law discriminatory and against the accrued rights of the appellants.
- E. That it is pertinent to mention that as per the seniority list of SETs (BPS-16) The Respondent No. 4 & 5 were Junior to the appellants, moreover they were promoted to the post of subject specialist (BPS-17) vide the same notification Dated: 01-01-2008, however when the seniority list S.S (BPS-17) was issued. The appellants was wrongly shown junior to them. **(Seniority list of SETs (BPS-16) attached as Annexure M)**
- F. That similarly placed employees were given seniority from the Date of 31-08-2000 while the appellants was ignored and was deprived of his due seniority position, it was only after the issuance of the impugned seniority list when the appellants came to know about the fact that the Respondent No.5 has been given promotion from 31-08-2000, hence this illegal action and inactions requires interference / direction of this worthy tribunal for correction of the seniority.
- G. That the appellants seeks the permission of this worthy Tribunal to rely on additional grounds at the time of arguments.

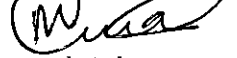
It is therefore, kindly prayed that on acceptance of this appeal the impugned seniority list of the subject specialists BPS-17 of E & SE Department may kindly be set aside / varied / modified and the appellants may kindly be assigned his proper place in the seniority list with all consequential benefits.

It is also prayed that the impugned order Dated: 04-07-2016 whereby the appeal of the appellant have been rejected may kindly be set aside and declare as illegal and ineffective upon the accrued rights of the appellant and consequently the appellants promotion may be reckoned from the date when the vacancies were available for promotion to the post of subject specialist with all back benefits.

Any other relief not specifically prayed for and which this Honorable deem fit in the facts and circumstances of the case may also be granted.


Appellant

Dated: 28 /07/2016

Through: 
Mushtaq Ahmad Advocate
High Court. Office at District
Courts Buner at Daggar.

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

S.A NO _____ 2016

Parvaiz Khan _____ (Appellant)

VERSUS

Govt of Khyber Pakhtunwa through Chief Secretary Khyber Pakhtunkhwa, at Peshawar and others(Respondent)

ADDRESSES OF PARTIES

Address of Appellant:-

Parvaiz Khan S/O Abdur Rehman Subject specialist B.P.S-17 (Pak-Studies)

R/O Village Shalbandi, Tehsil Gagra, District Buner, presently Serving at GHS Dewana Baba as principle(Appellant)

Addresses of Respondents

1. Govt of Khyber Pakhtunwa through Chief Secretary Khyber Pakhtunkhwa, at Peshawar.
2. Secretary to Govt of K.P.K, Elementary and Secondary Education Khyber Pakhtunwa, at Peshawar.
3. Director Elementary and Secondary Education Khyber Pakhtunwa, at Peshawar.
4. Muhammad Nabi, Subject Specialist B.P.S-18 (Pak-Studies) presently serving as V.P GHS Karman.
5. Jehangir Khan Subject Specialist B.P.S-17 (Pak-Studies) presently R/O Haripur presently serving as S.S (PS GC MHSS No. 1 Haripur).
6. Shaukat Rehman R/O Karak, presently serving as S.S, P.S B/18GHSS No.1 Kohat.
7. Changeez Khan R/O Peshawar presently serving as S.S GHSS No. 2 Peshawar Canntt:

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8. Mr. Majeebullah M.Sc, B.Ed Peshawar S.S Stat B/18 GHSS No.1
Peshawar City
9. Mr. Khurshid Alam M.Sc, B.Ed Karak S.S Stat B/18 GHSS Zamdara Dir
(Lower)
- 10.Sana Ullah M/A B.Ed Dir Lower S.S Stat B/18 GHSS Bugra Karak
- 11.Abdul Nawaz M/A, B.Ed Bannu S.S Eng B/18 GHSS Zamdara Dir

(Lower)
- 12.Abdur Rahman M.Sc, B.Ed Bannu S.S Eng B/18 GHSS Hakim Haved
Bannu
- 13.Muhammad Irfan Ullah M.Sc, B.Ed Hango S.S B/18 GHSS Jahangir

Karak
- 14.Ajmal Qadir M.A B.Ed Nowshera S.S Eng B/18 GHSS Tamb Charsada
- 15.Hamid Ullah M.Sc, B.Ed Karak Prl B/18 GHSS Boza Khel Bannu
16. Akhtar Ali M/A B.Ed Swat S.S English B/18 GHSS Fateh Pur Swat
- 17.Muhammad Alam M.A B/Ed Swat Prl GHS Islam pur Swat
- 18.Akhtar Abbass M.Sc, B.Ed D.I.Khan Instructor RITE Male D.I.Khan
- 19.Hakim Ullah M.Sc, B.Ed Bajawar Agency S.S Stat B/18 GHSS Domel

Bannu.
- 20.Muhammad Islam M.Sc B.Ed Bajawar Agency S.S State GHSS Dir lower.
- 21.Habib Ali M.Sc, B.Ed Swat S.S Stat B/18 GHSS Barikot Swat.
- 22.Muhammad Umar M.A, B.Ed Mansehra S.S Eng B/18 GHSS Ghari

Habibullah Mansehra.
- 23.Amanullah M.Sc, B.Ed D.I. Khan S.S Stat B/18 GHSS Kabangani Sawabi
- 24.Ashraf Ali M.A B.Ed Swabi S.S Engh B/18 GHSS No. D.I.Khan
- 25.Muhammad Ibrahim M.A, B.Ed Swat S.S Prl B/18 GHSSTotano Banda

Swat.

26. Saifullah Khan M.A B.Ed D.I.Khan S.SPRI B/18 GHSS Dalazak Charsada
27. Nawab Khan M.A B.Ed Bannu S.S Eng B/18 GHSS Rama D.I.Khan
28. Muhammad Rafiq M.A, B.Ed Karak PRL B/18 GHSS Panyal D.I.Khan
29. Usman Ghani M.A , B.Ed Karak S.S Eng B/18 GHSS Jahagiray Karak.
30. Shah Jehan M.A, B.Ed Malakand S.S Eng B/18 GHSS Tught Bala Kohat
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33. Sayed Amanullah Shah M.A, B.Ed Peshawar S.S B/18 Instructor RIT in
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34. Habibullah M.Sc B.Ed Bannu S.S place at the Disposal of Director of
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35. Said Muhammad Khan M.A, B.Ed Dir S.S Eng B/18 GHSS Wari Dir
upper
36. Sharif, Ud, Din M.A, B.Ed Dir S.S Eng B/18 GHSS Bughdada Mardan
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Khan lacky
39. Akram Said M.A, B.Ed Swat S.S Eng B/18 GHSS Barikot Swat
40. Jehan Zeb M.Sc, B.Ed Karak S.S physics GHSS Warana Karak.

41. Abdus Shakoor M.Sc B.Ed Kohat S.S Stat GHSS No.1 Kohat.
42. Munawar Khan M.Sc B.Ed Charsadda S.S Physics GHSS
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44. Abdul Ali M.Sc B.Ed Buner S.S Physics GHSS Nawagai
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45. Bakht Rawan M.Sc B.Ed Dir Lower S.S Physics GHSS
No.Zimdara Dir Lower.
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106. Raza Muhammad M/A B/Ed Swabi SS Econ: B/18 ismaila Swabi
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114. Israj Ali M/A B/Ed Malakand SS P/S GHSS Tamab Charsadda
115. Mian Zia Ud Din M/Sc B/Ed Nowshera Prl: B/18 GHS Talhatta
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117. Gul Islam M/Sc B/Ed Karak SS Eng B/18 GHSS Jandrai Karak
118. Sher Habib M/A B/Ed Dir Lower SS Maths B/18 GHSS Samar Bagh Dir
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119. Sher Ali Khan M/A B/Ed Dir Lower SS Eco BS /18 GHSS Khal Dir Lower
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122. Norani Gul M/Sc B/Ed malakand Prl B/18 GHS DALAZAK Charsadda
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124. Azim Khan M/Sc B/Ed Swat SS Physics B/18 GHS Shamozaai Swat
125. Iqbal Ali Shah M/A B/Ed Bannu SS Pak Studies B/18 GCHSS Bannu
126. Muhammad Sadiq M/A B/Ed FR Bannu SS Pak Studies GHSS Hakim
Haveed Bannu
127. Muhammad Riaz Khan M/A B/Ed NWA Place at the disposal of
director of Edu FATA
128. Jamil Ahmad MA B/Ed D.I Khan SS Pak Studies B/18 GHSS Shah Salim
Karak
129. Chen Zeb M/A B/Ed Abbottabad SS PS B/18 GHSS Bandi Dunda
Abbottabad
130. Muhammad Daraz Khan M/A B/Ed Karak Prl B/18 GHS Ahmadi Banda
Karak
131. Nizar Ali M/Sc B/Ed Charsadda SS Phy B/18 GHSS Tarnab Charsadda
132. S/Muhammad Tariq M/A B/Ed Charsadda prl GHSS Matta Mughal
Khel Charsadda
133. Alam Zeb Khan M/A B/Ed Dir Lower SS PS B/18 GHSS Khal Dir Lower

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134. Muhammad Aslam M/A B/Ed Charsadda Place at the disposal of director of Edu FATA
135. Nasrullah Zaib M/A B/Ed Buner SS Chem: GHSS B/18 Gadazai Buner
136. Zafar Javaid Quraishi M/A B/Ed Mansehra SS Chem: B/18 GHSS Behali Mansehra
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141. Iftikhar Ahmad mansehra SS PS B/18 GHSS NO/1 Mansehra
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145. Muhammad Ali M/A B/E D.I Khan VP B/18 GHSS No.2 DI Khan
146. Almas Khan M/Sc B/Ed Bannu SS Chem B/18 GCHSS Bannu
147. Irshad Ahmad M/Sc B/Ed Swabi SS Chem: B/18 GHSS Dheri Likpani Mardan
148. Gul Aslam M/A B/Ed Bannu SS Chem: B/18 Dheri Julogram Mkd
149. Hidayat Ur Rehman M/Sc B/Ed Malakand SS Chem: B/18 Chamkani Peshawar
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152. Zahid Hussain M/Sc B/Ed Orkazi Agency Prl B/18 GHS Chattar Plan Mansehra

153. Abdul Latif M/A M/Ed Charsadda SSS GHSS No. 3 Peshawar City
154. Sharif Ullah Khan M/Sc B/Ed Lakki SS P/Studies GH/SS No/3 Peshawar City
155. Farzand Ali M/Sc B/Ed D.I Khan SS Chem B/18 GHSS serai Nurang Lakki
156. Riaz Hussain M/Sc B/Ed Dir Lower prl B/18 GHSS Adam Dheri Dir lower
157. Fazal Muhammad M/Sc B/Ed Shangla SS Chem B/18 GHS Shahpur Shangla
158. Muhammad /Sher Ali Khan M/Sc B/Ed Swat SS Chem B/18 GHSS Khwaza khaila Swat
159. Ghazi Marjan M/Sc B/Ed Karak SS Chem: B/18 GHSS Togh Bala Kohat
160. Fida Muhammad M/Sc B/Ed Peshawar SS Chem B/18 GHSS Jallozai Nowshera
161. Hidayat Ullah Khan M/Sc B/Ed Bannu Prl: B/18 GHSS Harama Tala Lakki
162. Muhammad Sadiq M/Sc B/Ed Peshawar SS Pak Studies B/18 GHSS No.2 Peshawar Cantt
163. Inayat Ullah Khan M/A B/Ed DI Khan SS PS B/18 GHSS Ramjak D.I Khan
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165. Akhtar Hussain M/A B/Ed FR Bannu SS PS GHSS Serai Nurang Lakki
166. Suhrab Khan M/A B/Ed Mansehra SS PS B/18 GHSS Lasan Mansehra
167. Sherzada M/A B/Ed Swabi SS H/C B/18 GHSS Bam Khel Swabi
168. Fazal Rehman M/A B/Ed Abbottabad Prl: B/18 GHSS Mirpur Abbottabad
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175. Hakam Khan M/A B/Ed Lakki SS H/Pol: Sc GHSS Muryali DI Khan
176. Abdullah Shah M/A B/Ed Peshawar Prl: GHSS Takht Abbad Peshawar
177. Muhammad Parvez M/A B/Ed Malakand SS H/P Sc: GHSS dere
Jaligram Mkd:
178. Muhammad Siraj M/A B/Ed Swat SS H/C B/18 GHSS Khawaza Khela
Swat
179. Abdur Rehman M/A B/Ed Mardan SS Islamiat B/18 GHSS Ismailia
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180. Mir Haider M/A B/Ed Abbottabad SS ISI B/18 GHSS Kot Njibullah
Haripur
181. Muhammad Yaqub M/A B/Ed karak SS Islamiat B/18 GHSS Warana
Karak
182. Kifayat Ullah M/A B/Ed Bannu SS islamaiat B/18 GHSS NO 1 Peshawar
Cantt
183. Mr Amal Shah B/A B/Ed Nowshera prl: B/18 GHSS Bara Banda
Nowshera
184. Ghulam Baqi Jan B/A B/Ed Lakki VP B/18 GHSS No3 DIK
185. Nasrullah M/Sc B/Ed Bannu SS Bio B/18 GHSS Ramak DIK
186. Gul Yar Khan SS(Ec:) Swat SS Eco B/18 GHSS Fateh pur Swat
187. Mr Hameed Ullah B/A B/Ed Bannu Pl: GHS Titer Khel Lakki
188. Mr Ismatullah B/A B/Ed Bannu Pl: GHS No.2 Lakki
189. Mr Shafiful Haq B/A B/Ed Dir lower V/P GHS Khanpure Dir Lower
190. Muhammad shoaib M/A B/Ed FR Bannu Pl: GHS Behazadi Chicket Kot
Kohat


29

-12-

191. Awalyaz s/o Abbas Gul SS economics FR Bannu SS B-18 DCTE Abbottabad
192. Hafeez Ullah Khan s/o Mian Khan SS Eco: FR Bannu SS GHSS no.1 peshawar cantt
193. Ihsan Ud Din SS Urdu SS GHSS No.3 peshawar Cantt
194. Bahadur Zaman Hangu SS DCTE Abbottabad
195. Qazi Muhammad SS islamiat Abbottabad SS Eco GHSS No.1 Peshawar Cantt
196. Shabeer Ahmad M/A B/Ed Peshawar SS Urdu GHSS No.3 Peshawar
197. Safdar Khan M/A B/Ed Peshawar SS H/C GHS Doaba Hangu
198. Muhammad Waheed M/A M/Ed M/phil Nowshera Principal B-18 GHS Garibabad Tehkal Bala Peshawar
199. Aziz UI Haq M/A B/Ed Swar Instructor RITE (M) Peshawar
200. Abdul Majid M/A B/Ed Mansehra Dy. District Education Officer (M) Kohistan
201. Malik Khan M/A B/Ed Karak PI: GHS Ghudi qillah Karak
202. Asmat Ullah M/A B/Ed Swat At the disposal of DE (FATA)
203. Khurshid Khan M/A B/Ed Lakki PI: GHS Barkot Haripur
204. Zahid Zaman M/A B/Ed Kohat PI: GHS Karbogha Hangu
205. Shah Zarin M/A B/Ed Dir Upper Instructor RITE (m) Mardan
206. Abdul Qayyum M/A B/Ed kohat PI: GHS Kaghazi Kohat
207. Aman Ullah M/A B/Ed Swabi PI: GHS No.2 Marghuz Swabi
208. Iais Muhammad M/A B/Ed Mardan V/P GCHS Mardan
209. Atiqur Rehman M/A B/Ed Tank Instructor RITE (M) Mardan


Appellant

Dated: ___/07/2016

Through: 
Mushtaq Ahmad Advocate
High Court. Office at District
Courts Buner at Daggar.

30

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

S.A NO _____ 2016

Parvaiz Khan S/O Abdur Rehman Subject specialist B.P.S-17 (Pak-Studies)

(Appellant /Petitioner)

VERSUS

Govt of Khyber Pakhtunwa through Chief Secretary Khyber Pakhtunkhwa, at Peshawar and others (Respondent)

AFFIDAVIT

9 Perviz Khan, principle GHS Dewana Baba, do hereby affirm and declare on oath that the contents of the Service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable court.

DEPONENT 

Perviz Khan

31

Aux 'A'

OFFICE OF THE DIRECTOR OF SECONDARY EDUCATION N.W.F.P. PESHAWAR.

NOTIFICATION.

Consequent upon their selection by the Departmental Selection Committee, the Director Secondary Education NWFP, Peshawar has been pleased to appoint the following trained graduate candidates against SET posts at the school noted against each in BPS-16(Rs.2535-197-5450) plus usual allowances as admissible under the rules with immediate effect, subject to the existing terms and conditions.

S.No.	Name and Address.	School where posted.	Remarks.
1.	Mr. Fervees Khan B.Sc B.Ed. S/O <u>CHS, No.1 Baggar. (Dunir)</u> <u>Chalbandi (Sir) (Bumer)</u>		A. Vacant SET (2) post.

0/0/0/0/0/0/0/0/0

TERMS AND CONDITIONS:-

1. They will be governed by such rules and regulation as may be prescribed by the Govt: from time to time for the category of Govt: servant to which they belong.
2. Their service will be liable to termination on one month notice from either side. In case of resignation with out notice one month pay will be forfeited in lieu there of.
3. They should join the posts within one month of the issue of notification.
4. Their inter-se-seniority will be determined in accordance with the merit of Departmental Selection Committee.
5. Charge reports should be submitted to all concerned.
6. They shall be on probation for a period of two years.
7. Their original certificates/degrees should be checked and verified from the concerned university.
8. The declaration of assests should be obtained from the them and placed on record.
9. Fresh candidates should not be handed over charge if their age is less than 18 or more than 30+(2-years Govt:relaxation).
10. No TA/DA is allowed.
11. They are required to produce Health and Age Certificate from Medical authorities concerned, before taking over charge.

(S.ABU SAEED BACHA)
DIRECTOR SECONDARY EDUCATION
N.W.F.P. PESHAWAR.

Endst: No. 4029-34/A-14/SET/Apptt: Dated Peshawar the 24/5 /1995.

Copy forwarded for information to the:-

1. Accountant General NWFP, Peshawar.
2. District Account Officer Dunir
3. Director of Education (Primary) NWFP, Peshawar.
4. Director of Education (FATA) NWFP, Peshawar.
5. Divisional Director of Education (Schools) Malakand Division.
6. District Education Officer (M) Primary Dunir
7. District Education Officer (M) Secondary Dunir.
8. Private Secretary to Minister for Education (S/C) NWFP, Peshawar.
9. Private Secretary to Secretary Education Govt: of NWFP, Education Department Peshawar.
10. PA to Director of Secondary Education NWFP, Peshawar.
11. Principal/Headmaster concerned.
12. Official concerned.

MUSA UMAR/
MOHAMMAD IBRAHIM/
MDN:

attested
accepted
Musa

[Signature]
DEPUTY DIRECTOR SECONDARY
EDUCATION N.W.F.P. PESHAWAR.
24/5/95

« Ann 22 '1 B (32) »

Roll No. 238700

084

Al-Farooq Iqbal Open University



جامعة الفرق اقبال المفتوحة
فروعها في
المنصورة - مصر

Ann "B"

PARENTS NAME

regn. no

92-1111-0000

مدير

عبد الرحمن

son/daughter of

ABDUR RAHMAN

عبد الرحمن

مدير

having completed requirements

بعد اتمام المتطلبات

مدرسة

in 1941 is awarded the degree of

في

بكالوريوس في الآداب

مدرسة

Master of Science in PAKISTAN Studies

ماجستير في الدراسات
الباكستانية

She / She secured 71 % marks and was placed in 1st grade.

حصلت على 71 % من الدرجات
وكانت في الدرجة الأولى

Shamsul Bari

Vice-Chancellor

نائب مدير

Islamabad

The Director, Pakistan
Government, for the Technical
Education, in the capacity of
Head of the Department

Dated 21st Aug, 1973.

Controller of
Examinations

مدير امتحانات

1973

مدير

Handwritten signature and initials

33

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Aux 'C'

Serial No 000601

GOMAL UNIVERSITY

DERA ISMAIL KHAN

(N.W.F.P) PAKISTAN



(Session 1995-96)

PERVAIZ KHAN, SON of ABDUR RAHMAN, and

a student of Institute of Education and Research, Gomal University, having passed the prescribed examination in FEBRUARY, 19 99,

is this day admitted by the Gomal University to the **D E G R E E** of

Master of Education

in the SECOND Division.

The Examination was taken as a whole/~~in parts.~~

Registered No. 1051-Edu-95

Roll No. 867

August 13, 19 99

Countersigned

Controller of Examinations

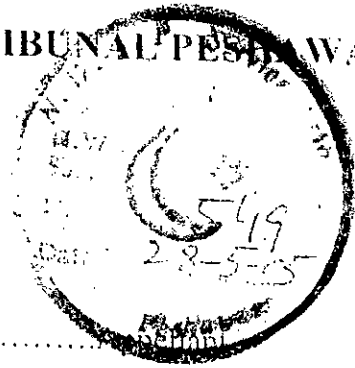
Vice-Chancellor

Aux 'D'

BEFORE THE N.W.F.P SERVICE TRIBUNAL PESHAWAR.

Appeal No 444 of 2005.

Perwaiz khan s/o Abdur-Rahman SET(sc)
Govt. High School Annawar District
Buner.....



Versus

- (1) Govt. of NWFP through Chief Secretary at Peshawar.
 - (2) Secretary to Govt. of N.W.F.P Schools and Literacy Department.
 - (3) Director Schools and Literacy N.W.F.P
 - ✓ (4) Mr. Abdul Latif, S.S, G.H.S.S, Shabqadar Fort Charsada.
 - ✓ (5) Mr. Mohammad Shafiq, S.S,G.C.H.S. Kohat.
 - (6) Mr. Mohammad Aslam, S.S,G.H.S.S, No.3 Peshawar City.
 - ✓ (7) Mr. Zard Ali Khan, S.S,G.H.S.S, No.4, Kakshal, Peshawar.
 - Mr. Ihsan Ullah, S.S,G.H.S.S, Ghani Dherai, Malakand.
- Respondents

Despatch No (8)
8 Ex-pat
with amble
dt: 22/5/05

Filed to-day

M. A. J.
28/5/05

APPEAL AGAINST THE NOTIFICATION NO SO(S)1-4/2004/
PROMOTION BS.16 to BS.17 S.S ON REGULAR BASIS
DATED PESHAWAR THE 05/01/2005.

15. 25.11.2006

Appellant with counsel,
Wahedullah, A.D with AGP for respondent-
department and counsel for private
respondents No. 4 to 7 are present. Heard.
Record perused.

This appeal arises against the
promotion order of private respondents
on regular basis dated 5.1.05. with the
prayer that on acceptance of this appeal,
the Notification dated 5.1.05 may be
declared as illegal,unlawful and of no
legal effect and the appellant be promoted

ATTESTED
EXAMINER
Service Tribunal
Peshawar

Accepted & accepted
M. A. J.

25/11/06

35

Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel where necessary

Form No 210

No. of Order or Proceedings

in terms of letter dated 23.9.2002 with all back benefits and wages. Any other remedy not specifically mentioned may also be granted.

The gravamen of the appellant's claim is that being M.A (Pak.Studies) he was eligible to be promoted as S.S(Pak.Studies) BS-17 and that private respondents possessing the qualification of Master Degree in History-cum-Pak.Studies, who were not eligible to be promoted as S.S, were promoted and he was ignored.

The departmental representative present before us stated that some vacancies are still available. So, without touching private respondents, the respondent department is directed to consider the case of the appellant favourably for promotion as S.S(Pak.Studies), subject to eligibility. With these observations, the instant appeal stands disposed of, with no order as to costs. File be consigned to the record.

ANNOUNCED

25.11.2006

(ABDUL SATTAAR KHAN)
CHAIRMAN
NWFP SERVICE TRIBUNAL
PESHAWAR

certified to be true copy

MAJID KHAN
Service Tribunal
Peshawar

(ABDUL KHAN)
MEMBER

[Handwritten signature]

[Handwritten notes and signatures on the left margin, including '25-11-06' and '2006']

36

Ann 'E'

GOVERNMENT OF N.W.F.P.
SCHOOLS & LITERACY DEPARTMENT

Dated Peshawar the 01-01-2008.

NOTIFICATION.

No. SO(S) 1-4/2007 / Promotion BS-16 to BS-17/SS on Regular Basis. On the recommendation of the Departmental Promotion Committee, the Competent Authority has been pleased to promote the following SETs (BPS-16) to the rank of Subject Specialists (BPS-17) on regular basis with immediate effect and adjusted in the Schools as noted against their names.

S. No.	Name and Address of the Officers.	Place of Posting / Adjustment.	Remarks.
1.	Mr. Jahangir Khan, SET.ADO (BS-16) o/o the EDO (S&L) Haripur	Subject Specialist (BS-17) (P/S) GHSS Panian Haripur.	A.V.P.
2.	Mr. Perwaiz Khan, SET (BS-16) GHS Shalbandi, Buner.	Subject Specialist (BS-17) (P/S) GHSS Batara Buner.	--do--
3.	Mr. Shaukat Rehman, SET (BS-16) GHSS Billitang, Kohat.	Subject Specialist (BS-17) (H/C) GHSS Chorlaki Kohat.	--do--
4.	Mr. Muhammad Nabi, SET (BS-16) GHS No.2 Parachinar Kurram Agency	Subject Specialist (BS-17) (P/S) Services placed at the disposal of the Director of Education (FATA) for further adjustment against the vacant post.	--do--

SECRETARY.

Endst. No.SO(S) 1-4/2007/ Promotion BS-16 to BS-17 SS. on Regular Basis.

Copy forwarded for information and necessary action to the:-

1. Accountant General N.W.F.P, Peshawar.
2. Special Secretary (Regulation), Establishment Deptt; NWFP.
3. Director Schools & Literacy NWFP Peshawar.
4. Director of Education (FATA) NWFP Peshawar.
5. Executive District Officer's (S&L) Concerned.
6. District / Agency Account's Officer Concerned.
7. Officers concerned.
8. Deputy Database Administrator (EMIS), S&L Department.
9. PS to Secretary to Govt. of NWFP Schools & Literacy Peshawar.
10. PA to Additional Secretary, Schools & Literacy Deptt; NWFP.
11. Office order file.

Nasrullah Khan
NASRULLAH KHAN
SECTION OFFICER (SCHOOLS).

M-Tahir / Rafiullah Taj Muhammad.

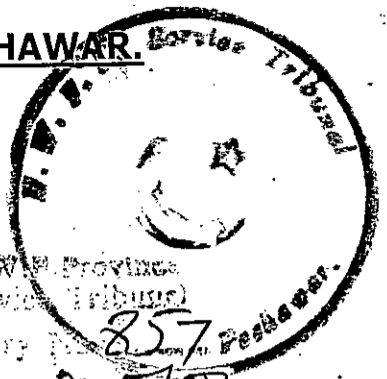
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accepted
Mura*

37
2

Aux 'F'

BEFORE THE NWFP SERVICE TRIBUNAL PESHAWAR.

APPEAL NO. 738 /08.



NWFP Province
Service Tribunal
Peshawar
257
23/5/08

Mr. Pervez Khan, S.S (Pak: Studies),
GHSS, Batara Buncay.....Appellant.

VERSUS

- 1- The Chief Secretary NWFP, Peshawar.
- 2- The Secretary Education (S&L) NWFP Peshawar.
- 3- The Director Education (S&L) NWFP Peshawar.

.....Respondents.

APPEAL UNDER SECTION 4 OF THE NWFP SERVICE TRIBUNALS ACT 1974 FOR ANTEDATED PROMOTION AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN 90 DAYS.

PRAYER:

That on acceptance of this appeal the respondents may be directed to consider the appellant for promotion from date of availability of vacancy of Subject Specialist Pak: Studies OR at least from 17.2.2003, the date w.e.from which the promotion and seniority given to the counter parts of the appellant. Any other remedy which this august Tribunal deems fit that may also be awarded in favour of appellant.

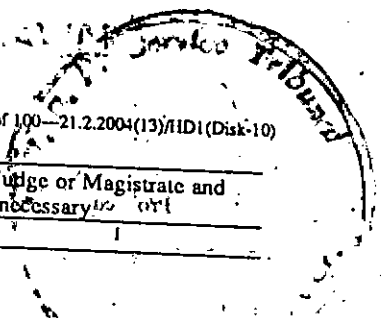
Filed to-
M.A.
23/5/08

ATTESTED
EXAMINER
NWFP Service Tribunal
Peshawar

738/08. 38

Criminal No. 210

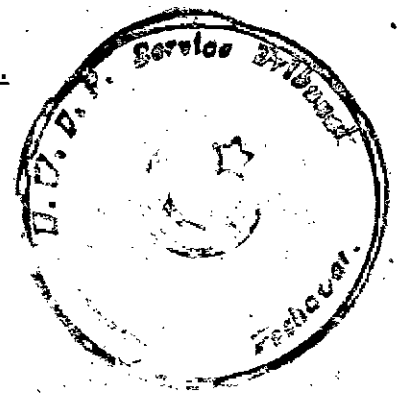
GS&PD, NWFP. - 457 F.S. 2,000 Pads of 100 - 21.2.2004(13)/1D1(Disk-10)



Serial No. of Order or Proceeding 1	Date of Order or Proceedings 2	Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel where necessary 3
	22.12.2008	<p>Counsel for the appellant and AGP alongwith Hidaytullah, S.O for the respondents present. Arguments heard and record perused. Vide our detailed judgment of to-day in connected appeal No. 737 of 2008, titled "Shaukat Rahman Versus Chief Secretary, NWFP, Peshawar and others", this appeal is also accepted as per detailed judgment.</p> <p><u>ANNOUNCED.</u> 22.12.2008</p> <p><i>[Signature]</i> Chairman</p> <p><i>[Signature]</i> Member</p> <p><i>[Signature]</i></p>

No. of presentation _____
 Number of pages 800
 Copying fee 6
 Transport 2
 Total 8
 Date of completion of copy 1-4-09
 Date of delivery of copy 1-4-09

BEFORE THE NWFP SERVICE TRIBUNAL, PESHAWAR.



Appeal No. 737/2008

Date of Institution. ... 23.05.2008

Date of Decision ... 22.12.2008

Mr. Shaukat Rahman; Subject Specialist (Pak. Studies)
Government Higher Secondary School, Kohat. ... (Appellant)

VERSUS

- 1. The Chief Secretary, NWFP Peshawar.
- 2. The Secretary Education (S&L) NWFP Peshawar.
- 3. The Director Education (S&L), NWFP Peshawar. ... (Respondents)

APPEAL UNDER SECTION 4 OF THE NWFP SERVICE TRIBUNALS ACT, 1974 FOR ANTEDATED PROMOTION AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN NINETY DAYS.

MR. MUHAMMAD ASIF YOUSAFZAI,
Advocate. ... For appellant

MR. ARSHAD ALAM,
A.G.P ... For respondents.

MR. JUSTICE (R) SALIM KHAN,
MR. FAZLI RAHMANI, ... CHAIRMAN
... MEMBER.

JUDGMENT

JUSTICE (R) SALIM KHAN, CHAIRMAN.-This judgment will dispose of appeals No. 737 of 2008, 738 of 2008 and 762 of 2008 by Shaukat Rahman, Pervez Khan and Muhammad Nabi appellants.

2. Shaukat Rehman contended that, with the qualification of M.A/M.ScS in relevant subject with B.Ed or Med, 50% posts of Subject Specialists were to be filled in by initial recruitment and 50% were to be filled

ATTESTED
EXAMINER
NWFP Service Tribunal
Peshawar

in by promotion from amongst SETs, ADOs and ASDOs, that in the working paper for the case of Pervez Khan, it was recorded that 21 posts were available. But the appellant was promoted as Subject Specialist on 1.1.2008 with immediate effect. He submitted departmental appeal which was not decided during the prescribed period. Hence the present appeal. Cases of Pervez Khan and Muhammad Nabi were also on the same lines.

3. The respondents contested all the three appeals. They contended that it was mentioned in the case of Pervez Khan that 21 posts were available but it did not mean that those posts were available from a very long time.

4. We heard the arguments and perused the record.

5. All the three appellants have been promoted with immediate effect. It has come on record that posts of Subject Specialists were available from certain time. The official respondents No. 1 to 3 did not clearly mention the dates from which the posts were lying vacant. The appellant contended that ratio of initial recruitment and promotion was 50% each. The copy of the rules dated 9.5.1994 produced by them, however, shows different ratio. This fact has also not been clarified by the respondents through their reply. The Working Paper in the case of Pervez Khan S.E.T shows that the ratio was 50% for initial recruitment and 50% for promotion. The number of promotees (66) and the number of balance share for promotion (21) were shown. It shows that the vacancies were not distributed one and one for each cycle of two vacancies, rather posts (174) were distributed as 87 for promotion and 87 for initial recruited. It has been clarified time and again that, without taking into consideration the number of persons already recruited or promoted, the incoming vacancies have to be distributed one by one, and seniority of the initially recruited and promoted persons is to be fixed in the same ratio. Reply to para (d) of the Grounds of Appeal shows that posts were available, at least, on 18.4.2007. But it is not clarified that when each of those 21 posts became vacant, and from which date each of the appellant was eligible for promotion.

The record shows that the promotion of the appellants had to be antedated to the dates on which vacancies were available to them. The appellants prayed

EXAMINER
MFP Service Tribunal
Peshawar

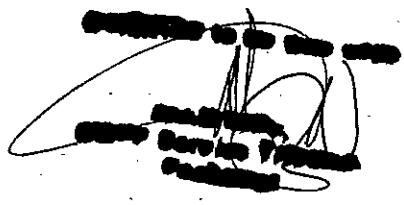
TESTED

for antedating of their promotion, at least, to 17.2.2003, when their colleagues were promoted.

7. In above circumstances, we accept the present three appeals, with costs, and direct the official respondents to antedate the promotions of the appellants to the dates on which the vacancies were available for them when they were eligible for promotion. The respondents are also guided to act on the Cycles and Roster system of recruitment and promotion, by dividing each set of two vacancies, by reserving one vacancy for initial recruitment and the other vacancy for promotion.

ANNOUNCED
22.12.2008

EdJ - Justice (C) Salim Usman
Chairman
EdJ - Fazli Nadeem
Members



Date of presentation	1-4-09
Number of marks	1200
Copying fee	8
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Total	10
Date of copy	1-4-09
Date of completion of copy	1-4-09
Date of delivery of copy	1-4-09

3

42

2

Aux 'G' ①



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

EDO Schools & Libraries
Diary No. J.1.3.11
Date: 20/11/12
District Bunir

NOTIFICATION

Dated Peshawar the November 12, 2012

AD (E) sent
Send to P...
of Court
17/11/12

NO.SO(S/M) E&SE/1-5/Incharge SS/HM/2012: In pursuance of Court Judgement, the Competent Authority is pleased to promote the following Subject Specialist Headmasters (Male) on regular basis from the date of their incharge posting noted against them.

S.#	Name & Designation of Officers	Transferred/Adjusted as	Date of Regularization as incharge SS/HM
1.	Mr Pervaz Khan SET GHS Shabandi Bunir.	Subject Specialist GHSS Battar Bunir.	17.02.2003
2.	Mr Shaukat Rehman SET GHSS B... Kohat.	Subject Specialist GHSS Chowrlaki Kohat.	17.02.2003
3.	Mr Muhammad Nabi SET GHS No. Parachinar FATA.	Services placed at the disposal of FATA.	17.02.2003
4.	Ihsanullah SET GHSS Gulistan Malakand.	I/C SS GHSS Takar Mardan.	17.02.2003

S. 11
31/11/12
G.S

2. NO TA/DA is allowed.

SECRETARY

Endst: Endst No. & Date

Copy - Forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Directors, E&SE Khyber Pakhtunkhwa, Peshawar/FATA.
3. Chairman Khyber Pakhtunkhwa Service Tribunal Peshawar.
4. All District Accounts Officers Khyber Pakhtunkhwa/FATA.
5. Executive District Officer E&SE Khyber Pakhtunkhwa. Bunir
6. PS to Chief Secretary, Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
8. PS to Additional Secretary, E&SE Department.
9. Incharge E&SE E&SE Department.
10. Official concerned.
11. Office order file.

Accepted

(Signature)

(MUJEEB-UR-REHMAN)
SECTION OFFICER (SCHOOLS/MALE)

GOVERNMENT OF KHYBER PAKHTUN KHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

NOTIFICATION

Dated Peshawar the November 12-2012

NO,SO (S/M.E &D/1-5/Incharge SS/HM/ 2012 In pursuance of court Judgment competent Authority. is pleased to promote the following Subject Specialist Head Masters (Male) on regular basis from the date of their in charge posting noted against them

S.#	Name & Designation of Officers	Transferred/Adjusted as	Date of Regularization as Incharge SS/HM
1	Mr Pervez Khan SET GHS Shalbandi Buner	Subject Specialist GHSS Battar Buner	17-02-2003
2	Mr Shaukat Rehman SET GHSS Kohat	Subject Specialist GHSS Chowrlaki Kohat	17-02-2003
3	Mr Muhammad Nabi SET GHS No 2 Parachinar FATA	Services placed at the disposal of FATA	17-02-2003
4	Mr Ihsan Ullah SET GHSS GUL Malakand	I/C SS GHSS Takar Mardan	17-02-2003

2. No TA/DA is allowed.

SECRETARY

Endst; No & Date

Copy forwarded to the;

1. Account General Khyber Pakhtunkhwa Peshawar.
2. Directors E&SE Khyber Pakhtunkhwa Peshawar/FATA
3. Chairman Khyber Pakhtunkhwa Service Tribunal Peshawar.
4. All District Accounts Officers Khyber Pakhtunkhwa Peshawar/FATA.
5. Exactive District Officer E&SE Khyber Pakhtunkhwa Buner.
6. Ps to chief Secretary, Khyber Pakhtunkhwa
7. Ps to Secretary E&SE Department Khyber Pakhtunkhwa
8. Ps to Additional Secretary, E&SE Department
9. Incharge EMISE E&SE Department
10. Officer concerned.
11. Office order file.

attested & accepted

(MUJEEB-UR-REHMAN)
SECTION OFFICER (SCHOOL/MALE)

Mujeeb-ur-Rehman

43

Aux 1

To:-

The Secretary,
Elementary & Secondary,
Education Govt of K.P.K Peshawar,

Through:-

PROPER CHANNEL.

Subject:-

APPEAL AGAINST THE FINAL SENIORITY LIST OF
S.S/HEAD MASTER MALE (B-17) OF ELEMENTARY &
SECONDARY EDUCATION DEPARTMENT K.P.K
PESHAWAR STOOD ON 13.2.2013.

Respected Sheweth:

I have the honour to invite your kind attention to the subject noted above and lay down the following few lines/facts for sympathetic consideration that:-


1. I was appointed as SET (Sc) on 24.5.1995 in the Education Department (copy attached).
2. In the year 1999 Director Secondary Education NWFP (KPK) invited application from all those SETs who passed M.A/M.Sc Degree for the consideration of their onward promotion as Subject Specialist (Copy attached).
3. I applied well in time. My serial No. was 24 while the Department gave promotion only to 22 SETs on 31.8.2000 despite the fact that sufficient No. of vacancies i.e 50 in SS (PS) were available on the basis of 50% quota.
4. The Director (S & L) again invited applications for the departmental promotion of SET to SS from the desiring qualified SETs vide letter No.3199-3225 Dated Peshawar the 23.9.2002 (Copy attached).
5. I applied well in time but I was not considered for promotion despite the fact that I was eligible for promotion.
6. So I lodged an appeal in the NWFP Service Tribunal Peshawar which was decided on 25.11.2006 in my favour but I was given promotion with immediate effect i.e 1.1.2008 (Copies attached).
7. I again filed an appeal in NWFP Service Tribunal Peshawar on 23.5.2008. Which was decided on 22.12.2008 with the remarks that the official respondents are directed to antedate the promotion of the applicant, to the date on which the vacancies were available for them when they were eligible for promotion (Copy attached).

Accepted
[Signature]

214

- 8. The Department/issued a Notification No.SO(S/M) E&SED/1-5/Incharge SS/HM/2012 Dated 12.11.2012. In which I was given promotion with effect from 17.2.2003 instead of 31.8.2000 despite the fact that the Department gave promotion to one Mr.Jehangir Khan of Haripur at S.No.377 w.e.from 31.8.2000 who is my colleague as well as Junior to me in BEd Seniority list issued by the Education Department (Copy attached).
- 9. I searched the order copy/Notification of Mr.Jehangir Khan with the concerned officials/Officers but invain.
- 10. When the Department issued the final Seniority List of SS/HM (Male) on website. After checking I was understood that Mr.Jehangir Khan of Haripur at S.No.377 and Mr.Mohammad Nabi of Kurm at S.No.650 were declared senior to me. I was allotted a wrong S.No.651 while in fact/record both of them are Junior to me according to the BEd Seniority list issued by the Education Department (Copy attached). My Date of Birth has been shown 14.5.1970 instead of 20.6.1965 and Qualification MA BEd instead of MSc Med respectively, which are wrong.

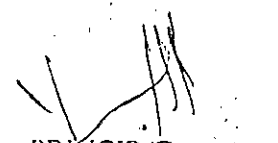
So it is requested in your honour kindly revise my promotion order/Notification instead of 17.2.2003 to 31.8.2000 in the light of the decision of NWFP (K.P.K) Service Tribunal Peshawar dated 22.12.2008 (copy attached) and declare Mr.Jehangir Khan SS (Ps) at S.No.377 and Mr.M.Nabi SS (Ps) at S.No.650 Junior to me in the final Seniority List of SS/HM Male (B-17) stood in 13.2.2013.

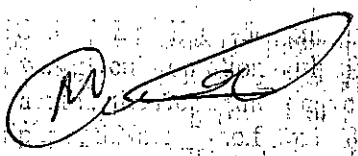

 (PERWAIZ KHAN)
 SS (Pak Stadies,
 GHSS Batara Buner.

No. 146 /

Dated 22/06 2013.

Forwarded in original to the District Education Officer District Buner at Daggar for further necessary action please.


 PRINCIPAL,
 GHSS Batara Buner.



38
24
62

FINAL SENIORITY LIST

OF

OFFICERS B – 17 (MALE) REGULAR
HEAD MASTERS & SUBJECT SPECIALISTS

AS IT STOOD ON

13th February 2013

GOVERNMENT OF KHYBER PAKHTUN KHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

NOTIFICATION

Dated Peshawar the November 12-2012

NO,SO (S/M.E &D/1-5/Incharge SS/HM/ 2012 In pursuance of court Judgment competent Authority is pleased to promote the following Subject Specialist Head Masters (Male) on regular basis from the date of their in charge posting noted against them

S.#	Name & Designation of Officers	Transferred/Adjusted as	Date of Regularization as Incharge SS/HM
1	Mr Pervez Khan SET GHS Shalbandi Buner	Subject Specialist GHSS Battar Buner	17-02-2003
2	Mr Shaukat Rehman SET GHSS Kohat	Subject Specialist GHSS Chowrlaki Kohat	17-02-2003
3	Mr Muhammad Nabi SET GHS No 2 Parachinar FATA	Services placed at the disposal of FATA	17-02-2003
4	Mr Ihsan Ullah SET GHSS GUL Malakand	I/C SS GHSS Takar Mardan	17-02-2003

2. No TA/DA is allowed.

SECRETARY

Endst; No & Date

Copy forwarded to the;

1. Account General Khyber Pakhtunkhwa Peshawar.
2. Directors E&SE Khyber Pakhtunkhwa Peshawar/FATA
3. Chairman Khyber Pakhtunkhwa Service Tribunal Peshawar.
4. All District Accounts Officers Khyber Pakhtunkhwa Peshawar/FATA.
5. Exactive District Officer E&SE Khyber Pakhtunkhwa Buner.
6. Ps to chief Secretary, Khyber Pakhtunkhwa
7. Ps to Secretary E&SE Department Khyber Pakhtunkhwa
8. Ps to Additional Secretary, E&SE Department
9. Incharge EMISE E&SE Department
10. Officer concerned.
11. Office order file.

attested & accepted (MUJEEB-UR- REHMAN)
SECTION OFFICER (SCHOOL/MALE)



413

Aux 1

To:-

The Secretary,
Elementary & Secondary,
Education Govt of K.P.K Peshawar,

Through:-

PROPER CHANNEL.

Subject:-

APPEAL AGAINST THE FINAL SENIORITY LIST OF
S.S/HEAD MASTER MALE (B-17) OF ELEMENTARY &
SECONDARY EDUCATION DEPARTMENT K.P.K
PESHAWAR STOOD ON 13.2.2013.

Respected Sheweth:

I have the honour to invite your kind attention to the subject noted above and lay down the following few lines/facts for sympathetic consideration that:-


1. I was appointed as SET (Sc) on 24.5.1995 in the Education Department (copy attached).
2. In the year 1999 Director Secondary Education NWFP (KPK) invited application from all those SETs who passed M.A/M.Sc Degree for the consideration of their onward promotion as Subject Specialist (Copy attached).
3. I applied well in time. My serial No. was 24 while the Department gave promotion only to 22 SETs on 31.8.2000 despite the fact that sufficient No. of vacancies i.e 50 in SS (PS) were available on the basis of 50% quota.
4. The Director (S & L) again invited applications for the departmental promotion of SET to SS from the desiring qualified SETs vide letter No.3199-3225 Dated Peshawar the 23.9.2002 (Copy attached).
5. I applied well in time but I was not considered for promotion despite the fact that I was eligible for promotion.
6. So I lodged an appeal in the NWFP Service Tribunal Peshawar which was decided on 25.11.2006 in my favour but I was given promotion with immediate effect i.e 1.1.2008 (Copies attached).
7. I again filed an appeal in NWFP Service Tribunal Peshawar on 23.5.2008. Which was decided on 22.12.2008 with the remarks that the official respondents are directed to antedate the promotion of the applicant, to the date on which the vacancies were available for them when they were eligible for promotion (Copy attached).

Accepted
(Signature)

24

- 8. The Department/issued a Notification No.SO(S/M) E&SED/1-5/Incharge SS/HM/2012 Dated 12.11.2012. In which I was given promotion with effect from 17.2.2003 instead of 31.8.2000 despite the fact that the Department gave promotion to one Mr.Jehangir Khan of Haripur at S.No.377 w.e.from 31.8.2000 who is my colleague as well as Junior to me in BEd Seniority list issued by the Education Department (Copy attached).
- 9. I searched the order copy/Notification of Mr.Jehangir Khan with the concerned officials/Officers but invain.
- 10. When the Department issued the final Seniority List of SS/HM (Male) on website. After checking I was understood that Mr.Jehangir Khan of Haripur at S.No.377 and Mr.Mohammad Nabi of Kurm at S.No.650 were declared senior to me. I was allotted a wrong S.No.651 while in fact/record both of them are Junior to me according to the BEd Seniority list issued by the Education Department (Copy attached). My Date of Birth has been shown 14.5.1970 instead of 20.6.1965 and Qualification MA BEd instead of MSc Med respectively, which are wrong.

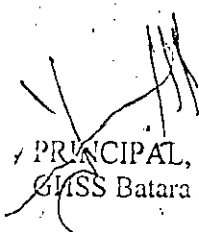
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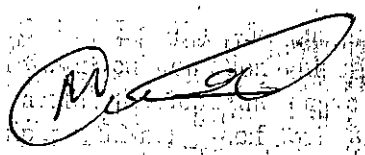

 (PERWAIZ KHAN)
 SS (Pak Studies,
 GHSS Batara Buner.

No. 146 /

Dated 22/06 2013.

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 PRINCIPAL,
 GHSS Batara Buner.



214

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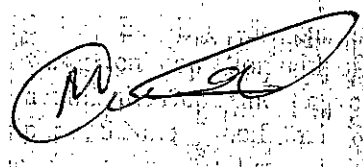

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 PRINCIPAL,
 GHSS Batara Buner.



SR.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry in Edu; Dept;	Regular appionment / Promtion to the present post			Designation/Place of Posting	Remarks
					Date	BPS	Method of Recruitment		
600	Nisar Ahmad M.Sc B.Ed	01.07.1965	Dir	16/5/92	17.02.2003	17	By Promotion	SS Physics GHSS Samar Bagh Dir L	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S No 5640/2001
601	Imtiaz Ali M.Sc B.Ed	15.03.1968	Haripur	18/9/95	17.02.2003	17	do	SS Blo GHSS RITE Haripur	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S No 5646/2001
602	Bakht Rawan M.Sc B.Ed	01.05.1964	Dir	25/9/89	17.02.2003	17	do	SS Physics GHSS Haya Sarai Maidan Dir	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 5649/2001
603	Jehan Badshah M.Sc B.Ed <i>Deind</i>	01.06.1963	Dir	17/5/95	17-02-2003	17	do	SS Physics GHSS Nawagai Bunir	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 5654/2001
604	Abdul Aji M.Sc B.Ed	01.03.1958	Bunir	20/11/86	17.02.2003	17	do	SS Physics GHSS Battara Bunir	SET S.No 5665/2001
605	Mir Aslam M.Sc B.Ed	15.09.1966	Mardan	25/3/96	17.02.2003	17	do	SS Physics GHSS Kohi Barmol Mardan	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S No 5750/2001
606	Munawar Khan M.Sc B.Ed	03.01.1962	Charsadda	24.05.1995	17.02.2003	17	do	SS Physics GHSS Tamab Charsadda	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 5764-B/2001
607	Abdus Shakoor M.Sc B.Ed	03.05.1961	Kohat	12.01.1988	17.02.2003	17	do	SS Stat GHSS Usterzai Payan Kohat	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 5806/2001
608	Jehanzeb M.Sc B.Ed	28.04.1964	karak	28/3/96	17.02.2003	17	do	SS Physics GHSS Shapur Shangla	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 5817/2001
609	Akram Said M.A B.Ed	02.02.1969	Swat	22/12/94	17.02.2003	17	do	SS English GHSS Totakan Maalakanad	SET S.No 5875/2001
610	Muhammad Amin M.Sc B.Ed	07.02.1970	Swat	15/1/98	17.02.2003	17	do	SS Blo GHSS Shahpur Shangla	SET S.No 5904/2001
611	Muhammad Jalil Khan s/o Zabita Khan M.A B.Ed	01.03.1965	Lakki Marwat	28.01.1998	17.02.2003	17	do	SS English GHSS Plo Dheri Mardan	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 5912/2001
612	Farman Ali M.Sc B.Ed	01.01.1969	Swabi	15/1/98	17.02.2003	17	do	SS Physics GHSS Bamkhel Swabi	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 5915/2001
613	Sharif-ud-Din M.A B.Ed	03.05.1970	Dir	15/1/98	17.02.2003	17	do	SS English GHSS Hattian Mardan	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 5916/2001
614	Said Muhammad Khan M.A B.Ed	01.03.1964	Dir	23/2/87	17.02.2003	17	do	SS English GHSS Khall Dir L	SET S.No 5918/2001
615	Habib Ullah M.Sc B.Ed	04.10.1965	FR Bannu	15/1/98	17.02.2003	17	do	SS Stat GHSS Kot Najibullah Haripur	SET S.No 5986/2001
616	Muhammad Akram M.Sc B.Ed	12.04.1971	DIKhan	26/5/99	17.02.2003	17	do	SS Stat GHSS Beer Haripur	SET S.No 6004/2001
617	Said Amanullah Shah M.A B.Ed	06.09.1970	Peshawar	26/10/93	17.02.2003	17	do	SS English GHSS NO1 Peshawar city	SET S.No 6014/2001
618	Qayyum Nawaz M.Sc B.Ed	07.03.1974	DIKhan	26/5/99	17.02.2003	17	do	SS Stat GHSS NO.4. D.I.Khan	SET S.No 6017/2001

add 16
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SR.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry in Edu; Deptt;	Regular appionment / Promtion to the present post			Designation/Place of Posting	Remarks
					Date	BPS	Method of Recruitment		
582	Shahid Ali M.Sc B.Ed	03.05.1970	Mardan	24/5/95	17.02.2003	17	By Promotio	SS Maths GHSS Takht Bai Mardan	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 5167/2001
583	Muhammad Saleem M.A B.Ed	04.01.1963	Swat	24/5/95	17.02.2003	17	do	SS English GHSS Olandar Shangla	SET S.No 5177/2001
584	Salar Islam Tariq M.A B.Ed	15.11.1968	Peshawar	24/5/95	17-02-2003	17	do	SS Pak Studies GHSS No.1 Peshawar C	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 5217/2001
585	Muhammad Ayaz Shah M.A B.Ed	10.03.1967	Mardan	24/5/95	17-02-2003	17	do	SS Pys GHSS Manki Sharif Nowshera	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 5240/2001
586	Gul Nawab Khan M.A B.Ed	11.04.1964	Bannu	27/11/85	17.02.2003	17	do	SS Eco: GHSS Shergarh Mansehra	SET S.No 5251/2001
587	Amir Sultan M.A B.Ed	27.04.1966	Swat	24.05.1995	17.02.2003	17	do	SS English GHSS Shahpur Shangla	SET S.No 5254/2001
588	Muhammad Tahir M.A M.Ed	25.12.1957	Swabi	26/11/81	17.02.2003	17	do	SS Eco: GHSS Mansabdar Swabi	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 5399/2001
589	Numan Ali M.A B.Ed	24.10.1961	Nowshera	24/10/84	17.02.2003	17	do	SS English GHSS Nisatta Charsadda	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 5400/2001
590	Inayat Ullah Khan M.A B.Ed	03.01.1961	Swat	10.01.1986	17.02.2003	17	do	SS English GHSS Chowga Shangla	SET S.No 5446/2001
591	Rafi Ullah Khan M.Sc B.Ed	04.02.1963	FR Kohat	13/3/90	17-02-2003	17	do	SS Physics GHSS Landi Kachi Kohat	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 5535-A/2001
592	Muhammad Hameed M.A B.Ed	25.03.1968	Malakand	22/3/92	17.02.2003	17	do	SS English GHSS Katlang Mardan	SET S.No 5536-B/2001
593	Izzat Khan M.A B.Ed	12.03.1969	Peshawar	10.01.1989	17.02.2003	17	do	SS Eco: GHSS Shabqader Fort Charsad	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 5539/2001
594	Farzand Ali Khan M.Sc B.Ed	09.01.1962	FR Bannu	25/10/89	17.02.2003	17	do	SS Stat GHSS Mamash Khel Bannu	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 5544/2001
595	Warqa Hussain M.Sc B.Ed	30.03.1968	Ork Agy	12.06.1905	17.02.2003	17	do	SS,Phy:GHSS,Kalaya Ork:Agy:	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 5560/2001
596	Muhammad Wakeel M.Sc B.Ed	09.04.1964	karak	18/9/88	17.02.2003	17	do	SS Physics GHSS Lachi Kohat	SET S.No 5607/2001
597	Qadrat Ali Khan M.Sc B.Ed	04.12.1959	karak	27/10/85	17.02.2003	17	do	SS Stat GHSS Karak	SET S.No 5611/2001
598	Abid Hussain M.A B.Ed	01.03.1969	Peshawar	1/1/87	17.02.2003	17	do	SS English GHSS Hazar Khwani Peshav	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 5635/2001
599	Fazal Wahab M.Sc B.Ed	07.02.1964	Bunir	19/5/90	17.02.2003	17	do	SS Blo GHSS Battara Bunir	SET S.No 5636/2001

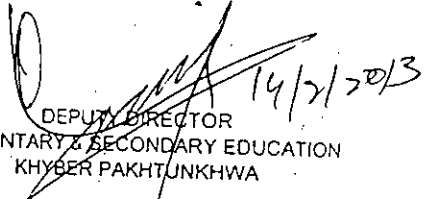
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(61)

SR.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry in Edu; Deptt;	Regular apponment / Promtion to the present post			Designation/Place of Posting	Remarks
					Date	BPS	Method of Recruitment		
1878	Bahramand Khan BA BEd	02/04/1960	Buner	17/12/1987	24/01/2011	17	By Promotion	HM GHS Topai Buner	Notification No SO(PE)-5/E&SE/DPC Meeting/2010 dated 27.03.2010
1879	Abdul Latif SET (Tech)	05/09/1961	Swabi	17/12/1987	24/01/2011	17	id	HM GHS Jhanda Swabi	Notification No SO(PE)-5/E&SE/DPC Meeting/2010 dated 27.03.2010
1880	Khan Bahadar MA BEd	15/04/1955	Malakand	07/12/1978	24/01/2011	17	id	HM GHS Agra Malakand	Notification No SO(PE)-5/E&SE/DPC Meeting/2010 dated 27.03.2010

CERTIFICATE:-

It is certified that the Seniority List is final and undisputed.


 DEPUTY DIRECTOR
 ELEMENTARY & SECONDARY EDUCATION
 KHYBER PAKHTUNKHWA

abdul


SR.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry In Edu; Deptt;	Regular apponment / Promtion to the present post			Designation/Place of Posting	Remarks
					Date	BPS	Method of Recruitment		
641	Ajmal Qadir M.A B.Ed	10.10.1968	Nowshera	12.01.1990	17-02-2003	17	By Promotion	SS English GHSS Khair Abad Nowshera	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 7317/2001
642	Muhammad Irfan Ullah M.Sc B.Ed	01.02.1973	Hangu	19/5/94	17.02.2003	17	do	SS Stat GHSS Jahangiri Karak	SET S.No 7356/2001
643	Mr. Abdur-ur-Rehman M.Sc B.Ed	01.09.1970	DIKhan	29/1/2002	17.02.2003	17	do	SS Stat GHSS Bagra Haripur	SET S.No 7412/2001
644	Abdul Nawaz Khan M.A B.Ed	08.06.1972	Bannu	21/4/99	17.02.2003	17	do	SS English GHSS Battara Bunir	SET S.No 7420/2001
645	Sana Ullah M.A B.Ed	05.02.1973	Dir	03.01.1998	17.02.2003	17	do	SS English GHSS Zamdara Madan Dir	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 7422/2001
646	Mr.Khurshid Alam M.Sc B.Ed	04.04.1972	karak	17/11/94	17.02.2003	17	do	SS Stat GHSS Tamab Charsadda	SET S.No 7457/2001
647	Mr.Mujeeb Ullah M.Sc B.Ed	08.08.1969	Peshawar	26/5/97	17.02.2003	17	do	SS Stat GHSS No1 Peshawar City	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 7484/2001
648	Mr.Changez Khan M.Sc B.Ed	30.08.1974	Peshawar	29/1/2002	17.02.2003	17	do	SS Stat GHSS No2 Peshawar Cantt.	SET S.No 7511/2001
649	Shaukat Rehman MA MEd (H/C)	10.03.1969	Karak	24.05.1995	17.02.2003	17	do	SS GHSS Chor Lakki Kohat	vd SO(SA)/1-5/08/ct 12.11.2012
650	Muhammad Nabi SS (Pak.Study) MA MEd	12.03.1969	FATA	27.10.1994	17.02.2003	17	do	SS GHSS Kalaya OrakAg	vd SO(SA)/1-5/08/ct 12.11.2012
651	Pervaiz Khan SS MA BEd	14.05.1970	Bunir	27.10.1994	17.02.2003	17	do	SS GHSS Batara Bunir	vd SO(SA)/1-5/08/ct 12.11.2012
652	Ihsan Ullah SS MA BEd	02.06.1970	Mardan	27.10.1994	17.02.2003	17	do	SS GHSS Takkar Mardan	vd SO(SA)/1-5/08/ct 12.11.2012
653	Rozam Khan M.A B.Ed <i>Not existing</i>	21/03/1954	Swat	22.06.1975	27/05/2003	17	do	HM GHS Shaki Qilla Bajour Agency	
654	Saeed Ahmad M.A B.Ed	07/03/1975	Haripur	01.09.2003	01.09.2003	17	D/Selectee	SS ENG GHSS Bahghra Haripur	vd SO(S)/3-2/2003/SS (M&F) dt 28.08.2003 Lot:2001
655	Ifukhar Ahmad, M.A B.Ed	04/02/1971	Mansehra	01.09.2003	01.09.2003	17	do	SS, Eng. GHSS No.1 Mansehra	vd SO(S)/3-2/2003/SS (M&F) dt 28.08.2003 Lot:2001
656	Fazli Umar.M.A B.Ed	14/08/1975	kohat	05.11.2003	05/11/2003	17	D/Selectee	SS, Islamiat, GHSS, Choraki, Kohat	vide notification No.SO(S)/3-2/2003/SS M&F dated 05.12.2003
657	Muhammad Rizwanullah, M.A B.Ed	22/12/1968	Swabi	22.04.1993	05/11/2003	17	do	SS, Pushto RITE (M) Gulbhar	
658	Bashir Ahmad, M.A B.Ed	02/03/1969	Nowshera	09.01.1998	05/11/2003	17	do	SS, Isl, GHSS, Thakht Bai Mardan	
659	Muzaffar ali khan, M.A B.Ed	01/01/1973	Shangla	01.09.2003	01/09/2003	17	do	SS, ECO, GHSS, Butial, Shangla	
660	Muazam Shah, M.A B.Ed	15/02/1977	Chitral	05.11.2003	05.11.2003	17	do	SS, Isl, GHSS, Mori lasht chitral	
661	Shahid Ahmad, M.A B.Ed	12/04/1975	Shangla	01.09.2003	01.09.2003	17	do	SS, PS, GHSS, Butial Shangla	
662	Muhammad Tariq, M.A B.Ed	01/04/1969	Peshawar	11.02.1990	20/01/2004	17	do	SS, Isl, GHSS, Gulbhar Peshawar	
663	Aliqur Rehman, M.A B.Ed	06/03/1973	Mansehra	03.06.1996	05/11/2003	17	do	SS, Isl, GHSS, Battal, Mansehra	
664	S.Shah Hussain shah, M.A B.Ed	20/04/1969	Nowshera	25.04.1992	01/09/2003	17	do	SS, PS, GHSS, Akbar Pura NSR:	
665	Iqtidar Ali, M.A B.Ed	03/10/1972	Peshawar	18.05.1992	01/09/2003	17	do	SS GHSS, Zierat masoom, A/Abad	
666	Mutahir Khan, M.A B.Ed	04/04/1977	Dir	01.09.2003	01.09.2003	17	do	SS, PS, GHSS, Khal Dir L	

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SR.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry in Edu; Deptt;	Regular apponment / Promtion to the present post			Designation/Place of Posting	Remarks
					Date	BPS	Method of Recruitment		
619	Habibullah Khan M.Sc B.Ed	01.12.1966	Lakki Marwat	26/5/99	17.02.2003	17	By Promotion	SS Stat GHSS Kot Najibullah Haripur	sen.aw.vd so(s)1-5/2007 dt 14-02-07 SET S.No 6032/2001
620	Shah Jehan M.A B.Ed	01.06.1973	Malakand	26/5/99	17.02.2003	17	do	SS English GHSS Takkar Mardan	SET S.No 6034/2001
621	Usman Ghani M.A B.Ed <i>Left the deptt</i>	12.10.1958	karak	26/5/99	17-02-2003	17	do	SS English GHSS Shodial Mansehra	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 6042/2001
622	Muhammad Raffeq M.A B.Ed	09.05.1971	karak	26/5/99	17.02.2003	17	do	SS English GHSS Manki Sharif Noshehr	SET S.No 6051/2001
623	Nawab Khan M.A B.Ed	22.11.1966	Bannu	12.08.1987	17.02.2003	17	do	SS English GHSS Umerzai Charsadda	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 6133/2001
624	Saifullah Khan M.A B.Ed	15.10.1964	DIKhan	25/2/90	17.02.2003	17	do	SS English GHSS Kathgarh DIKhan	SET S.No 6145/2001
625	Ashraf Ali Khan M.A B.Ed <i>Died</i>	02.05.1957	Bannu	03.06.1982	17.02.2003	17	do	SS English GHSS Dalola A. Abad	SET S.No 6342/2001
626	Zahid Ullah M.A B.Ed	10.02.1955	Charsadda	05.01.1975	17.02.2003	17	do	SS English GHSS Hassanzai Charsadda	SET S.No 6401/2001
627	Faqir Muhammad M.A B.Ed	01.01.1955	Mansehra	04.04.1976	17.02.2003	17	do	SS English GHSS Sherpur Mansehra	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 6610/2001
628	Muhammad Ibrahim M.A B.Ed	01.01.1959	Swat	17/2/89	17-02-2003	17	do	SS English Kohi Barmol Mardan	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 6750/2001
629	Ashraf Ali M.A B.Ed	15.05.1956	Swabi	02.01.1988	17.02.2003	17	do	SS English GHSS Gandaf Swabi	SET S.No 6843/2001
630	Aman Ullah Khan M.Sc B.Ed	13.04.1964	DIKhan	07.12.1999	17.02.2003	17	do	SS Stat GHSS Takar Mardan	SET S.No 6982/2001
631	Muhammad Umar Khan M.A B.Ed	01.07.1962	Mansehra	04.12.1985	17.02.2003	17	do	SS English GHSS Kawai Mansehra	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 7167/2001
632	Habib Ali M.Sc B.Ed	01.04.1968	Swat	28/6/97	17.02.2003	17	do	SS Stat GHSS Charbagh Swat	SET S.No 7225/2001
633	Muhammad Islam M.Sc B.Ed	05.06.1966	Bajour	17/10/95	17-02-2003	17	do	SS Stat GHSS Munda Dir L	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 7243/2001
634	Hakim Ullah M.Sc B.Ed	15.04.1974	NWA	07.12.1999	17.02.2003	17	do	SS Stat GHSS Kalkot Dir U	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 7255/2001
635	Badshah Hazrat M.A B.Ed	01.05.1970	Dir	28/7/99	17.02.2003	17	do	SS English GHSS Barawal Bandi Dir	SET S.No 7280/2001
636	Akhtar Abbas M.Sc B.Ed	09.04.1974	DIKhan	15/2/96	17.02.2003	17	do	SS Stat GHSS Mankayal Swat	SET S.No 7285/2001
637	Muhammad Alam M.A B.Ed	15.04.1971	Swat	29/1/2002	17.02.2003	17	do	SS English GHSS Kishwara Swat	SET S.No 7291/2001
638	Muzaffar ali khan M.A B.Ed	01.01.1973	Shangla	01.09.2003	01.09.2003	17	do	SS,ECO;GHSS, Butial, Shangla	SET S.No 7300/2001
639	Akhtar Ali M.A B.Ed	27.01.1972	Swat	29/1/2002	17.02.2003	17	do	SS English GHSS Butyal Shangla	SET S.No 7303/2001
640	Hamid Ullah M.Sc B.Ed	04.02.1969	FR Bannu	29/1/2002	17-02-2003	17	do	SS Bial GHSS Landi Kuchi Kohat	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 7301/2001

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SR.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry in Edu; Deptt;	Regular appoinment / Promtion to the present post			Designation/Place of Posting	Remarks
					Date	BPS	Method of Recruitment		
567	Lal Wadood M.Sc B.Ed	15.01.1966	Mardan	24/5/95	17-02-2003	17	By Promotion	SS Physics GHSS Pirsadi Mardan	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 5051/2001
568	Younis Ali Khan M.Sc B.Ed	03.05.1966	Mardan	24/5/95	17.02.2003	17	do	SS Maths GHSS Takar Mardan	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 5052/2001
569	Fazal Rabbi M.Sc B.Ed	04.01.1963	Malakand	24/5/95	17.02.2003	17	do	SS Physics GHSS Sherpao Charsadda	SET S.No 5053/2001
570	Farid Khan, M.A B.Ed	01.01.1968	Dir	24-5-95	17.02.2003	17	do	SS, GHSS, Ziarat Talash Dir L	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 5066/2001
571	Tariq Farooq M.Sc B.Ed	25.12.1966	Mansehra	24/5/95	17.02.2003	17	do	SS Maths GHSS Behali Mansehra	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 5068/2001
572	Shahbaz Muhammad M.Sc B.Ed	21.03.1964	Malakand	29.1.91	17-02-2003	17	do	SS Maths GHSS Totakan Mikd;	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 5087/2001
573	Malak Muhammad Naeem M.A B.Ed	11.02.1961	Nowshera	24/10/85	17.02.2003	17	do	SS Eco: GHSS A.Pura Nowshera	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 5093/2001
574	Khurshid Ali Khan, M.Sc B.Ed	11.01.1969	FR Bannu	05.10.1985	17.02.2003	17	do	SS, Stat: GHSS, in FATA	SET S.No 5100/2001
575	Zain Ullah M.A B.Ed	06.04.1966	Peshawar	24/5/95	17.02.2003	17	do	SS Eco: GHSS Tehkal Peshawar	sen.aw.vd so(s)1-5/2005 dt 14-02-07 SET S.No 5106/2001
576	Hamid Hussain M.A B.Ed	13.10.1965	Kohat	04.10.87	17.02.2003	17	do	SS Pak Studies GHSS Landi Kachi Koha	sen.aw.vd so(s)1-5/2005 dt 14-02-07 SET S.No 5114/2001
577	Abdul Hamid M.A B.Ed	19.08.1967	Dir	31/3/90	17.02.2003	17	do	SS Pak Studies GHSS Samar Bagh Dir L	sen.aw.vd so(s)1-5/2005 dt 14-02-07 SET S.No 5139/2001
578	Ghulam Daud Khan M.Sc B.Ed	15.03.1965	Bannu	24/5/95	17-02-2003	17	do	SS Blo GHSS Jabori Mansehra	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 5143/2001
579	Ihsan Ullah M.Sc B.Ed	19.03.1968	Mardan	24/5/95	17-02-2003	17	do	SS Maths GHSS Battara Bunir	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 5146/2001
580	Munir Khan M.Sc B.Ed	08.04.1971	malakand	24/5/95	17-02-2003	17	do	SS Physics GHSS Ghani dheri Malakand	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 5153/2001
581	Ahmad Saeed M.A B.Ed	06.01.1963	Kohat	28/5/95	17.02.2003	17	do	SS Pak Studies GHSS Sherpao Charsadda	SET S.No 51651/2001


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SR.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry in Edu; Deptt;	Regular appionment / Promtion to the present post			Designation/Place of Posting	Remarks
					Date	BPS	Method of Recriutment		
550	Muhammad Anwar M.A B.Ed	05.10.1962	Peshawar	23/2/84	17.02.2003				sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 4921/2001
551	Hazrat Umar M.Sc B.Ed	06.04.1962	Charsadda	19/11/85	17.02.2003	17	By Promotion	SS Eco: GHSS No3 Peshawar City	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 4923/2001
552	Faizur Rahman M.Sc B.Ed	10.05.1963	Batagram	05.01.1986	17.02.2003	17	do	SS Blo GHSS Nisatta Charsada	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 4924/2001
553	Khan Gul Jadoon M.Sc B.Ed	16.01.1957	Abbott Abad	02.01.1986	17.02.2003	17	do	SS Bio GHSS Behali Mansehra	SET S.No 4932/2001
554	Nadeem Sultan M.Sc B.Ed	01.04.1968	Abbott Abad	10.12.1989	17.02.2003	17	do	SS Maths GHSS Bagnother A. Abad	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 4939/2001
555	Iqbal Ali M.Sc B.Ed	09.05.1955	Swat	30.08.79	17.02.2003	17	do	SS,Bio,GHSS, Sandovi Shangla	SET S.No 4941/2001
556	Amin-ul-Haq M.A B.Ed	05.05.1967	Malakand	10.01.1989	17.02.2003	17	do	SS Pak Studies GHSS Bagh Maidan Dir	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 4953/2001
557	Javid Akhtar M.A B.Ed	05.11.1967	Abbott Abad	26/8/89	17.02.2003	17	do	SS Maths GHSS Lora A.Abad	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 4955/2001
558	Said Bad Shah M.A B.Ed	08.04.1963	Moh:Agy	30.10.88	17.02.2003	17	do	SS Maths,GHSS, Mayar Mardan	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 4965/2001
559	Khan Badshah M.Sc B.Ed	03.03.1967	Mardan	05.06.1992	17.02.2003	17	do	SS Maths GHSS Dheri Lakpani Mardan	SET S.No 4973/2001
560	Sayed Latif Shah M.Sc B.Ed	11.12.64	Hangu	11.07.1994	17.02.2003	17	do	SS Blo GHSS No4 Kakshal Peshawar	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 4974/2001
561	Muhammad Ghulam M.Sc B.Ed	19.09.1961	Kurram	12.09.1989	17.02.2003	17	do	SS Maths GHSS Katghar DIKhan	SET S.No 4985/2001
562	Muhammad Rahim M.Sc B.Ed	10.04.1964	FR Bannu	23/5/95	17.02.2003	17	do	SS Physics GHSS Sheringal Dir U	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 4986/2001
563	Fayaz Ahmad M.Sc B.Ed	23.04.1965	Charsadda	03.05.1994	17.02.2003	17	do	SS Stat GHSS Hassanzai Charsadda	SET S.No 5009/2001
564	Muhammad Askar M.A B.Ed	04.01.1956	Haripur	14/12/74	17.02.2003	17	do	SS Pak Studies GHSS RITE Haripur	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 5011/2001
565	Muzafar Shah M.Sc B.Ed	19.03.1967	Dir	06.01.1995	17.02.2003	17	do	SB Physics GHSS Gujar Ghar Mardan	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 5024/2001
566	Mehboobur Rehman M.A B.Ed	15.03.1963	karak	21/2/85	17.02.2003	17	do	SB Eco: GHSS Karak	SET S.No 5027/2001

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SR.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry in Edu; Deptt;	Regular apponment / Promtion to the present post			Designation/Place of Posting	Remarks
					Date	BPS	Method of Recriutment		
535	Mehrab Gul M.A B.Ed	01.06.1959	karak	20/2/84	17.02.2003	17	By Promotion	SS Eco: GHSS Shah Salim Karak	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 4479/2001
536	Muhammad Afzal M.A B.Ed	28.08.1963	Kohat	23/11/87	17.02.2003	17	do	SS Pak Studies GHS PaloDheriMardan	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 4483/2001
537	Raza Muhammad M.A B.Ed	01.12.1961	Swabi	01.06.88	17-02-2003	17	do	SS,Econ:GHSS.Ismaila Swabi	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 4523/2001
538	Muhammad Israr,M.A B.Ed	10.01.1955	Charsadda	26.11.81	17.02.2003	17	do	Econ:GHSS, Umerzai Charsadda	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 4572/2001
539	Muhammad Younas,M.A B.Ed	10.11.1960	Abbottabad	25.11.79	17.02.2003	17	do	SS PS GHSS, Rich bhen A/Abad	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 4652/2001
540	Hayat Muhammad M.A B.Ed	20.05.1964	Charsadda	09.12.1987	17.02.2003	17	do	SS Pak Studles GHSS Dhakki Chdd:	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 4741/2001
541	Ihsan Ullah M.A B.Ed	15-04-1959	Malakand	10.03.1985	17-02-2003	17	do	SS Pak Studles GHSS Ghani Dheri Malakand	SET S.No 4770/2001
542	Khizar Hayat M.Sc B.Ed	25.04.1962	Nowshera	12.10.1987	17-02-2003	17	do	SS Blo GHSS Manki Sharif Nowshera	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 4822/2001
543	Gulfam Iqbal M.A B.Ed	25.04.1960	Kohat	20/11/86	17.02.2003	17	do	SS Pak Studies GHSS Dheri LakpaniMar	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 4826/2001
544	Niamat Ullah M.Sc B.Ed	08.01.1960	Peshawar	14/9/87	17.02.2003	17	do	SS Blo GHSS Chamkani Pehsawar	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 4846/2001
545	Habib-ur-Rehman M.Sc B.Ed	05.10.1962	karak	14/2/88	17-02-2003	17	do	SS Blo GHSS Dheri Lakpani Mardan	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 4847/2001
546	Sher Zada M.Sc B.Ed	12.10.1960	Swat	29/11/86	17.02.2003	17	do	SS Maths GHSS Bari Kot Swat	SET S.No 4863/2001
547	Zard Ali Khan M.A B.Ed	08.08.1959	Peshawar	24/10/81	17.02.2003	17	do	SS Pak Studies GHSS No 4 Kakshal Pes	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 4892/2001
548	Muhammad Ayaz Khan,M.Sc B.Ed	25.04.1961	Bannu	24.11.85	17.02.2003	17	do	SS Bio GHSS Hakim Haved Bannu	SET S.No 4896/2001
549	Abdur Rashid M.Sc M.Ed	15.04.1962	Swabi	09.02.1991	17.02.2003	17	do	SS Blo GHSS Bughdada Mardan	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 4917/2001


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	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry in Edu; Deptt;	Regular applonment / Promtion to the present post			Designation/Placo of Posting	Remarks
					Date	BP8	Method of Rqcrutment		
518	Akhtar Waheed M.A B.Ed	10.10.1964	Kohat	10.10.1985	17.02.2003	17	By Promotion	SS Pak Studies GHSS Lachi Kohat	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 4203/2001
519	Norani Gul M.Sc B.Ed	15.02.1967	Malakand	17/6/87	17.02.2003	17	do	SS Maths GHSS Hassanzai Charsadda	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 4207/2001
520	Khalil-ur-Rehman M.A B.Ed	10.04.1969	FR Bannu	04.10.1994	17-02-2003	17	do	SS Eco: GHSS Nisatta Charsadda	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 4227/2001
521	Tayyib Shahzad M.A B.Ed	10.04.1963	Haripur	10.11.1987	17.02.2003	17	do	SS Pak S GHSS Khanspur Ayubia A. Ab	SET S.No 4247/2001
522	Sher Ali Khan M.A B.Ed	03.03.1963	Dir	25/5/87	17.02.2003	17	do	SS Eco: GHSS Khanpur Dir L	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 425/2001
523	Sher Habib M.A B.Ed	24.02.1960	Dir	14/10/81	17.02.2003	17	do	SS English GHSS Haya Sari Maidan Dir	SET S.No 4252/2001
524	Gul Islam M.Sc B.Ed	05.04.1963	karak	06.11.1988	17.02.2003	17	do	SS Maths GHSS Dallar Kohat	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 4256/2001
525	Daud-ur-Rehman M.A B.Ed	12.02.1965	Charsadda	11.10.1994	17.02.2003	17	do	SS English GHSS Shabqader Fort Chd	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 4264/2001
526	Mian Zia-ud-Din M.Sc B.Ed	01.08.1967	Nowshera	12.04.1988	17-02-2003	17	do	SS Maths GHSS Manki Sharif Nowshera	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 4266/2001
527	Israj Ali M.A B.Ed	13.02.1968	Malakand	11.10.1994	17-02-2003	17	do	SS Pak Studies GHSS Tranab Charsadd	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 4268/2001
528	Sajid Aziz M.A B.Ed	12.04.1963	Haripur	04.03.1986	17.02.2003	17	do	SS Eco: GHSS KTS Hari Pur	sen.aw.vd so(s)1-5/2007 dt 19-12-07 SET S.No 4290/2001
529	Muhammad Shafqat M.A B.Ed	12.03.1963	Mansehra	12.05.1983	17.02.2003	17	do	SS GHSS Gharl Habibullah Mansehra	SET S.No 4326/2001
530	Mahboob Khan M.A B.Ed	22.01.1966	NWA	11.10.1994	17.02.2003	17	do	SS Eco: GHSS Kalkot Dir U	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 4355/2001
531	Jehanzeb M.A B.Ed	31.03.1963	Haripur	07.05.1989	17.02.2003	17	do	SS Pak Studies GHSS Behali Mansehra	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 4360/2001
532	Jan Sahib Ali M.A B.Ed	20.04.1955	Hangu	03.04.1980	17.02.2003	17	do	SS Eco: GHSS Usterzai Kohat	SET S.No 4411/2001
533	Wali Ullah M.A B.Ed	04.03.1960	karak	03.05.1978	17.02.2003	17	do	SS Pak Studies GHSS Doaba Hangu	SET S.No 4454/2001
534	Sair Ullah Shah M.A B.Ed	23.03.1965	Bannu	17.11.1987	17.02.2003	17	do	SS Eco: GHSS Ghoriwala Bannu	SET S.No 4458/2001

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Sl. No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry in Edu; Deptt;	Regular applonment / Promtion to the present post			Designation/Place of Posting	Remarks
					Date	BPS	Method of Recruitment		
500	Shah-e-room, M.A B.Ed	15.01.1961	Mardan	26.12.1990	17.02.2003	17	By Promotion	SS, Econ:GHSS, Garhi Kapora, Mardan	SET S.No 3860/2001
501	Zulfiqar Ali M.A B.Ed	21.01.1965	Nowshera	01.10.1989	17-02-2003	17	do	SS English GHSS Pirpai Nowshera	sen. aw. vd so(s) 1-5/2007 dt 30-10-08 SET S.No 3927/2001
502	Zafar Javaid Quraishi M.A B.Ed	04.04.1959	Mansehra	23.10.1986	17.02.2003	17	do	SS Chem: GHSS Behali Mansehra	sen. aw. vd so(s) 1-5/2006 dt 19-12-07 SET S.No 3946-A/2001
503	Nasrullah Zaib M.A B.Ed	18.06.1967	Bunir	04.02.1991	17.02.2003	17	do	SS Chem: GHSS Chowga Shangla	SET S.No 3948/2001
504	Muhammad Aslam M.A B.Ed	11.04.1966	Charsadda	28.11.1992	17.02.2003	17	do	SS Pak Studies GHSS No3 Peshawar	sen. aw. vd so(s) 1-5/2006 dt 14-02-07 SET S.No 3982/2001
505	Alam Zeb Khan M.A B.Ed	17-12-66	Dir	28.08.1994	17.02.2003	17	do	SS Pak Studies GHSS Ziarat Talash Dir	sen. aw. vd so(s) 1-5/2006 dt 14-02-07 SET S.No 3989/2001
506	S. Muhammad Tariq M.A B.Ed	15.04.1969	Charsadda	10.11.1994	17.02.2003	17	do	SS PS GHSS Hassanzai Charsadda	sen. aw. vd so(s) 1-5/2006 dt 14-02-07 SET S.No 3997/2001
507	Nizar Ali M.Sc B.Ed	20.11.1966	Charsadda	10.11.1994	17-02-2003	17	do	SS Physics GHSS Tarnab Charsadda	sen. aw. vd so(s) 1-5/2007 dt 30-10-08 SET S.No 4029/2001
508	Muhammad Daraz Khan M.A B.Ed	04.02.1968	karak	10.11.1994	17.02.2003	17	do	SS P.S GHSS Shah Salim Karak	SET S.No 4030/2001
509	Chen Zeb M.A B.Ed	01.01.1964	Abbott Abad	04.03.1982	17.02.2003	17	do	SS Pak Studies GHSS Nathia Gali A. Ab	SET S.No 4044/2001
510	Jamil Ahmad M.A B.Ed	01.06.1969	DIKhan	10.11.1994	17.02.2003	17	do	SS Pak Studies GHSS No:4 DIKhan	SET S.No 4134/2001
511	Muhammad Riaz Khan M.A B.Ed	01.03.1968	NWA	10.11.1994	17.02.2003	17	do	SS Eco: GHSS Hasanzai Chdd:	sen. aw. vd so(s) 1-5/2006 dt 14-02-07 SET S.No 4141/2001
512	Muhammad Sadiq M.A B.Ed	01.03.1965	FR Bannu	10.11.1994	17.02.2003	17	do	SS Pak Studies GHSS Kabgani Swabi	sen. aw. vd so(s) 1-5/2006 dt 19-12-07 SET S.No 4143/2001
513	Mukhtiar Ahmad M.A B.Ed	07.01.1967	Haripur	15.09.1988	17.02.2003	17	do	SS Eco: GHSS Beer Haripur	SET S.No 4149/2001
514	Munir Hussani M.A B.Ed	20.05.1963	Mansehra	11.05.1981	17.02.2003	17	do	SS Pak Studies GHSS Kawai Mansehra	sen. aw. vd so(s) 1-5/2006 dt 14-02-07 SET S.No 4152/2001
515	Shamsher Ahmad M.A B.Ed	26.11.1963	Swat	10.01.1986	17.02.2003	17	do	SS English GHSS Balkhela Maiakand	SET S.No 4156/2001
516	Iqbal Ali Shah M.A B.Ed	21.10.1969	Bannu	29/4/92	17-02-2003	17	do	SS Pak Studies GHSS Ghorī Wala Bannu	sen. aw. vd so(s) 1-5/2007 dt 30-10-08 SET S.No 4189/2001
517	Azim Khan M.Sc B.Ed	01.04.1962	Swat	11.07.1987	17.02.2003	17	do	SS Physics GHSS Fatehpur Swat	SET S.No 4200/2001

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SR.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry in Edu; Dept;	Regular appionment / Promtion to the present post			Designation/Place of Posting	Remarks
					Date	BPS	Method of Recruitment		
484	Muhammad Rafiq M.A B.Ed <i>Left in dept joined H. Education</i>	22.10.1959	Mansehra	15.04.1979	17.02.2003			SS Pak Studies GHSS Dhodial Mansehra	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 3158/2001
485	Abdul Latif M.A M.Ed	20.05.1957	Charsadda	01.10.1989	17.02.2003			SS Pak Studies GHSS NO 3 Peshawar	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 3273/2001
486	Zahid Hussain M.Sc B.Ed	09.02.1965	Orkazai	03.10.1984	17.02.2003			SS Pak Studies GHSS Tarnab Charsadd	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 3347/2001
487	Ihsan-ut-Haq M.Sc B.Ed	13.03.1961	Mansehra	19.04.1986	17.02.2003			SS Chems GHSS Jaraid Manshera	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 3352/2001
488	Muhammad Jamshaid, M.Sc B.Ed	15.12.1965	Kohat	30.11.1989	17.02.2003			SS Chem;GHSS,Chamkani Pesh;	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 3373/2001
489	Hadyat-ur-Rehman M.Sc B.Ed	04.04.1958	Malakand	12.11.1984	17.02.2003			SS Chem: GHSS Palay Malakanad	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 3522/2001
490	Gul Aslam M.A B.Ed	15.07.1964	Bannu	06.12.1989	17.02.2003			SS Pak Studies GHSS Jaloza Nowshera	SET S.No 3540/2001
491	Irshad Ahmad M.Sc B.Ed	01.06.1963	Swabi	09.05.1990	17-02-2003			SS Chem: GHSS Mayer Mardan	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 3592/2001
492	Almas Khan M.Sc B.Ed	25.04.1960	Bannu	11.11.1985	17-02-2003			SS Chem: GHSS Summer Bagh Dir L	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 3697/2001
493	Muhammad Ali M.A B.Ed	17.04.1964	DIKhan	18.01.1986	17.02.2003			SS Eco: GHSS Takkar Mardan	SET S.No 3720/2001
494	Abdullah Khan M.Sc B.Ed	20.04.1964	NWA	12.03.1989	17.02.2003			SS Chem: GHSS Shiringal Dir U	SET S.No 3747/2001
495	Muhammad Shafiq M.A B.Ed	08.02.1960	Kohat	15.10.1985	17.02.2003			SS Pak Studies GCHS Kohat	SET S.No 3783/2001
496	Khalid Ahmad M.Sc B.Ed	10.01.1961	Kohat	28.10.1985	17-02-2003			SS Chem: GHSS Doaba Hangu	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 3784/2001
497	Ifkhar Ahmad M.A B.Ed	01.04.1961	Mansehra	10.11.1985	17.02.2003			SS Pak Studies GHSS Darband Manseh	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 2312/2001 SET S.No 3789-A/2001
498	Saeed Ahmad M.A B.Ed	15.04.1965	Mansehra	27.11.1990	17.02.2003			SS Pak Studies GHSS Bafa Mansehra	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 3791/2001
499	Muhammad Mubashir M.A B.Ed	16.06.1964	Mansehra	27.11.1990	17.02.2003			SS Eco: GHSS G.H.Ullah Mansehra	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 3791-A/2001

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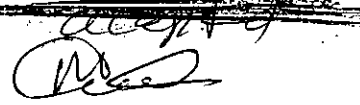
SR.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry in Edu; Deptt;	Regular applonment / Promotion to the present post			Designation/Place of Posting	Remarks
					Date	BPS	Method of Recruitment		
466	Taj Muhammad M.A B.Ed <i>Died</i>	04.01.1956	Abbott Abad	12.10.1974	17.02.2003	17	By Promotion	SS H/Pol Sc GHSS Nawasher A/Abad	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 2276/2001
467	Shad Muhammad M.A B.Ed	30.06.1954	Mansehra	01.02.1976	17.02.2003	17	do	SS H/Pol Sc GHSS Dalota A/Abad	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 2277/2001
468	Mehboob Ilahi M.A B.Ed	01.01.1957	Haripur	15.10.1976	17.02.2003	17	do	SS H/Pol Sc GHSS Manki Sharif Nowshera	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 2278/2001
469	Fazal Rehman M.A B.Ed	15.05.1959	Abbott Abad	04.02.1978	17.02.2003	17	do	SS H/Pol Sc RITE Haripur	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 2290/2001
470	Sherzada M.A B.Ed	09.09.1956	Swabi	06.11.1975	17.02.2003	17	do	SS H/Pol Sc GHSS Bam Khel Swabi	SET S.No 2312/2001
471	Schrab Khan M.A B.Ed	01.02.1959	Mansehra	20.09.1987	17.02.2003	17	do	SS Pak Studies GHSS Shergar Mansehra	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 2487/2001
472	Ahmar Hussain M.A B.Ed	6/11/1961	FR Bannu	12.10.1988	17.02.2003	17	do	SS Pak Studies GHSS Dara Pizu Lakki	SET S.No 2855/2001
473	Abdul Qayum Khan M.A B.Ed	23.08.1962	Lakki Marwat	19.10.1988	17.02.2003	17	do	SS Pak Studies GHSS Abakhel Lakki	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 2858/2001
474	Inyat Ullah M.A B.Ed	17.08.1966	DIKhan	01.09.1988	17.02.2003	17	do	SS Pak Studies GHSS Kathgar D.I.Khan	SET S.No 2925/2001
475	Muhammad Sadiq M.A B.Ed	06.04.1961	Peshawar	09.01.1983	17.02.2003	17	do	SS Pak Studies GHSS No 2 Pesh Cantt	SET S.No 2944/2001
476	Hidayat Ullah Khan M.Sc B.Ed	01.01.1957	Bannu	28.11.1983	17.02.2003	17	do	SS Chem: GHSS Baghicha Dheri Mdn	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 2976/2001
477	Fida Muhammad M.Sc B.Ed	12.04.1959	Peshawar	09.10.1985	17.02.2003	17	do	SS GHSS Jaloza Noshehra	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 2978/2001
478	Ghazi Marjan M.Sc B.Ed	05.08.1959	karak	09.02.1988	17.02.2003	17	do	SS Chem: GHSS Togh Bala Kohat	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 2995/2001
479	Muhammad Sher Ali Khan M.Sc B.Ed	08.06.1959	Swat	06.11.1985	17.02.2003	17	do	SS Chem: GHSS Baidara Swat	SET S.No 3004/2001
480	Fazal Muhammad M.Sc B.Ed	05.03.1959	Shangla	01.11.1987	17.02.2003	17	do	SS Chem: GHSS Shapur Shangla	SET S.No 3005/2001
481	Riaz Hussain M.Sc B.Ed	02.02.1960	Dir	08.08.1989	17.02.2003	17	do	SS Chem: GHSS munda Dir (L)	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 3007/2001
482	Farzand Ali M.Sc B.Ed	01.10.1956	DIKhan	24.11.1982	17-02-2003	17	do	SS Chem: GHSS Manki Sharif Nowshera	SET S.No 3049/2001
483	Sharif Ullah Khan M.Sc B.Ed	08.11.1960	Lakki Marwat	23.12.1985	17-02-2003	17	do	SS Chem: GHSS Dheri Lakpani Mardan	sen.aw.vd so(s)1-5/2007 dt 30-10-03 SET S.No 3145/2001

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SR.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry In Edu; Deptt;	Regular apponment / Promtion to the present post			Designation/Place of Posting	Remarks
					Date	BPS	Method of Recruitment		
448	Ismail M.A B.Ed	12.01.1956	Dir	11.12.1979	17.02.2003	17	By Promotion	SS Islamiat GHSS Bagh Maidan Dir L	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 11173/2001
449	Abdur Rehman M.A B.Ed	15.09.1957	Mardan	05.10.1982	17.02.2003	17	do	SS Islamiat GHSS Ismailia Swabi	SET S.No 1200-A/2001
450	Iftikhar Qadir, M.A B.Ed	01.01.1954	Mansehra	12.01.1974	17.02.2003	17	do	SS,PS,GHSS, Karori Mansehra.	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 1422/2001
451	Nizakat-ur-Rehman M.A B.Ed	22.05.1955	Mansehra	28.09.1975	17.02.2003	17	do	SS H/Pol Sc GHSS Shergar Mansehra	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 1778/2001
452	Iqbal Munir M.A B.Ed	10.04.1958	Bannu	10.01.1985	17.02.2003	17	do	SS H/Pol Sc GHSS Darban Kalan DIKha	SET S.No 1788/2001
453	Muhammad Siraj M.A B.Ed	13.02.1961	Swat	02.05.1985	17.02.2003	17	do	SS H/Pol Sc GHSS Mankyal Swat	SET S.No 1826/2001
454	Naeem Jan M.A B.Ed	15.02.1955	Dir	01.11.1975	17.02.2003	17	do	SS H/Pol Sc GHSS Lal Qila Dir (L)	SET S.No 1828/2001
455	Muhammad Pervez M.A B.Ed	01.03.1958	Malakand	04.05.1985	17-02-2003	17	do	SS H/Pol,Sc,GHSS,Totakan Mkd.	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 1829/2001
456	Abdul Ullah Shah M.A B.Ed	03.02.1960	Peshawar	15.05.1985	17.02.2003	17	do	SS H/Pol Sc GHSS Daag Peshawar	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 1853/2001
457	Hakam Khan M.A B.Ed	11.04.1961	Lakki Marwat	13.10.1982	17.02.2003	17	do	SS H/Pol Sc GHSS DIKhan	SET S.No 1891/2001
458	Gul Ambar Khan M.A B.Ed	02.11.1954	Swat	20.03.1979	17.02.2003	17	do	SS H/Pol Sc GHSS Char Bagh Swat	SET S.No 1922/2001
459	Muhammad Iddres Khan M.A B.Ed	06.05.1956	Haripur	10.05.1974	17.02.2003	17	do	SS H/Pol Sc GHSS KTS Haripur	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 1975/2001
460	Bashir Hussain, M.A B.Ed	01.09.1958	Abbottabad	09.12.1978	17.02.2003	17	do	SS,H,Pol,Sc,GHSS, Boi A.Abad	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 1976/2001
461	Abdul Malik M.A B.Ed;	18.10.1956	FR Pesh:	01.12.1985	17.02.2003	17	do	SS H/Pol Sc GHSS Chamkani Peshawar	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 2075/2001
462	Mustafa Khan M.A B.Ed	19.02.1959	Dir	03.03.1984	17.02.2003	17	do	SS H/Pol Sc GHSS Mian Brangula Dir (L)	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 2140/2001
463	Abbas Gul M.A B.Ed	12.01.1959	Mardan	23.10.1982	17.02.2003	17	do	SS Pak Studies GHSS Pirsadi Mardan	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 2177/2001
464	Muhammad Zareen Khan M.A B.Ed	12.04.1959	Haripur	01.02.1978	17.02.2003	17	do	SS P.S GHSS K.H.Ullah Haripur	SET S.No 2220/2001
465	Muhammad Khurshid M.A B.Ed	23.05.1955	Mansehra	05.02.1978	17.02.2003	17	do	SS H/Pol Sc GHSS Karori Mansehra	sen.aw.vd so(s)1-5/2006 dt 19-12-07 SET S.No 2225/2001

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SR No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry in Edu; Deptt;	Regular appionment / Promtion to the present post			Designation/Place of Posting	Remarks
					Date	BPS	Method of Recruitment		
422	Mr Fazal Wali B.A B.Ed	15.06.1955	Mardan	26.10.79	17.02.2003	17	By Promotion	HM GHS, Babuzai Mardan	vd SO(S/M)/1-5/08/dt 20.05.2011 SET S.No 672/2001
423	Mr Haq Nawaz M.A M.Ed	04.01.1956	Peshawar	28.10.1976	17.02.2003	17	do	HM GHS, Hayat Abad Peshawar	SET S.No 706/2001
424	Mr Izhar Ahmad B.A B.Ed	15.09.1953	Mardan	18.11.1979	17.02.2003	17	do	HM GHS, Maira Adamzai Haripur	SET S.No 709/2001
425	Mr Ismatullah Khan B.A B.Ed	01.08.1956	Bannu	20.03.1978	17.02.2003	17	do	HM GHS, No.3 Lakki	SET S.No 717/2001
426	Mr Hameed Ullah B.A B.Ed	15.02.1957	Bannu	11.12.1979	17.02.2003	17	do	HM GHS, Bezu Kheh Lakki	SET S.No 725/2001
427	Mr Fazli Amin B.A B.Ed	01.04.1954	Mardan	22.12.1979	17.02.2003	17	do	HM GHS, Machai Mardan	SET S.No 729/2001
428	Mr Mushtaq Ahmad B.A B.Ed R+d	10.11.1957	Karak	02.02.1974	17.02.2003	17	do	HM GHS, Makori Karak	SET S.No 737-A/2001
429	Mr Ghulam Baqi Jan B.A B.Ed	4/5/1956	Lakki	10.05.1980	17.02.2003	17	do	HM GHS, Kharo Kheh Lakki	SET S.No 747/2001
430	Mr Inayat Ullah B.A B.Ed	01.01.1954	D.I.Khan	15.09.1980	17.02.2003	17	do	HM GHS, Wanda Madat DIK	SET S.No 777/2001
431	Mr Rehman Shah B.A B.Ed	07.04.1954	Mansehra	18.11.1975	17.02.2003	17	do	HM GHS, Jal Gali Mansehra	SET S.No 780/2001
432	Mr Mirza Ali Khan B.A B.Ed	10.01.1954	Bannu	16.10.1976	17.02.2003	17	do	HM GHS, Tora Warai Naryab Hangu	SET S.No 782/2001
433	Mr Amal Shah B.A B.Ed	18/02/1956	Nowshera	21.5.76	17.02.2003	17	do	HM GHS No.2 Pirpai Nowshera	vd SO(S/M)/1-5/08/dt 20.05.2011 SET S.No 786/2001
434	Mr Faizur Rehman B.A B.Ed	02.08.1953	Dir	06.10.1967	17.02.2003	17	do	HM GHS, Kar Dara Dir L	SET S.No 805/2001
435	Mr Azizur Rehman B.A B.Ed	23.05.1955	Abbottabad	19.11.1977	17.02.2003	17	do	HM GHS, Nihagdara Dir U	SET S.No 815/2001
436	Aurang Zeb M.A B.Ed	20.01.1956	Peshawar	09.11.1980	17-02-2003	17	do	SS Islamiat GHSS Nisatta Charsadda	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 834/2001
437	Mr Muhammad Nasim B.A B.Ed	17.02.1954	Malakand	01.05.1979	17.02.2003	17	do	HM GHS, No.2 Batkhela Malakand	SET S.No 848/2001
438	Mr Inayat Ullah B.A B.Ed	01.04.1955	Bannu	17.11.1976	17.02.2003	17	do	HM GHS, Renolia Kohistan	SET S.No 851/2001
439	Muhammad Islam M.A B.Ed	01.10.1954	Karak	18.03.1974	17.02.2003	17	do	SS Islamiat GHSS Shakardara Kohat	SET S.No 854/2001
440	Kifayat Ullah Jan M.A B.Ed	05.11.1958	Bannu	23.05.1981	17-02-2003	17	do	SS Islamiat GHSS No 1 Peshawar Cantt	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 914/2001
441	Ghulam Jan.M.A B.Ed	08.09.1954	Mansehra	24.11.1975	17.02.2003	17	do	SS Islamiat GHSS, Jabori Mansehra	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 1056/2001
442	Ghulam Rabbani M.A B.Ed	15.06.1955	Lakki	30.04.1978	17.02.2003	17	do	SS Islamiat GHSS Darra Pezu Lakki	5/15/1953 SET S.No 1081/2001
443	Muhammad Yaqub M.A B.Ed	11.10.1956	karak	14.01.1982	17.02.2003	17	do	SS Islamiat GHSS Shah Safim Karak	SET S.No 1123/2001
444	Muqarrab Khan,M.A B.Ed	02.05.1955	FR Bannu	20.06.1976	17.02.2003	17	do	SS Isl:GHSS,Gujar Garhi Mardan.	SET S.No 1125/2001
445	Aabdur Rashid M.A B.Ed	04.08.1955	FR Bannu	02.07.1973	17.02.2003	17	do	SS Islamiat GHSS Domel Bannu	SET S.No 1149/2001
446	Janat Khan M.A B.Ed	15.01.1954	FR Pesh:	11.04.1974	17-02-2003	17	do	SS Islamiat GHSS Ja'ozai Nowshera	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 1150/2001
447	Mir Haider,M.A B.Ed	08.10.1958	A.Abad	05.12.1976	17.02.2003	17	do	SS Isl:GHSS, Bareez Haripur.	SET S.No 1153/2001

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SR.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry in Edu; Dept;	Regular Appoinment / Promtion to the present post			Designation/Place of Posting	Remarks
					Date	BPS	Method of Recruitment		
394	Shabeer Ahmad M.A M.Ed	20/04/1969	Peshawar	04/10/1991	03/02/2001	17	D/Selectee	HM GHS Nothia Qadeem Peshawar	
395	Qazi Muhammad Amir s/o Qazi M.Nawaz Khan SS (Islamiat)	25/05/1967	ATD	14/11/1994	21/05/2002	17	do	GHSS Bagnotar ATD	
396	Banadur Zaman s/o Sahibzada Abdul Qadeem SS (History Cum Civics)	15/05/1962	Hangu	26/10/1989	21/05/2002	17	do	GHSS Shekhan Peshawar	Subject to provision of PSC record. 5/99
397	Ihsan ud Din s/o Sherza Din SS (Urdu)	10.08.1970	Charsadda	21/05/2002	21/05/2002	17	do	SS GHSS Umarzai Charsadda	vd SO(S)3-2/2000 / SS (M) dt 21.05.2002
398	Hafeez Ullah Khan s/o Mian Khan SS (Economics)	05/11/1969	FR Bannu	21/05/2002	21/05/2002	17	do	GHSS Gulbaha: Peshawar	Subject to provision of PSC record.
399	Awalyaz s/o Abbas Gul SS (Economics)	01/10/1963	FR Bannu	21/05/2002	21/05/2002	17	do	GHSS Jalozai NSR	on deputation to BISE ATD. Subject to provision of PSC record.
400	Muhammad Shoaib M.A B.Ed	11.02.1972	FR Bannu	01.09.1999	21/05/2002	17	do	SS GCHSS Bannu	vd SO(S)3-2/2000 / SS (M) dt 21.05.2002
401	Mr Saifullah B.A B.Ed	01.05.1954	Bannu	21.04.1978	17.02.2003	17	By Promotion	HM GHS, Kosham Chitral	SET S.No 529/2001
402	Mr Fida Muhammad B.A B.Ed	10.04.1955	Swabi	04.03.1978	17.02.2003	17	do	HM GHS Jhanda Swabi	SET S.No 544/2001
403	Mr Hamed Khan B.A B.Ed	15.12.1955	Karak	02.11.1978	17.02.2003	17	do	HM GHS, Garya: Payeen Kohat	SET S.No 546/2001
404	Mr Allah Nawaz B.A B.Ed <i>Died</i>	01.04.1956	D.I.Khan	16.12.1978	17.02.2003	17	do	HM GHS, Rehmani Khel Di Khan	SET S.No 550/2001
405	Mr Muhammad Aurangzeb B.A B.Ed	26.04.1954	Peshawar	19.04.1978	17.02.2003	17	do	HM GHS, B.B. Kral Pesh:	SET S.No 553/2001
406	Mr Muhammad Hanif B.A B.Ed	15.05.1953	Bannu	07.11.1977	17.02.2003	17	do	HM GHS, Ademzai Lakki	SET S.No 557/2001
407	Mr Sultanul Mulik B.A B.Ed	09.05.1953	Dir	01.10.1975	17.02.2003	17	do	HM GHS, Gumbal Banda	SET S.No 574/2001
408	Mr Nisar Khan B.A B.Ed <i>Died</i>	18.04.1954	Nowshera	15.08.1979	17.02.2003	17	do	HM GHS, Maroba NSR	SET S.No 581/2001
409	Mr Abdul Latif B.A B.Ed	01.05.1955	Karak	10.03.1979	17.02.2003	17	do	HM GHS, Kirosum Kohat	SET S.No 588/2001
410	Mr Muhammad Inam B.A B.Ed	15.05.1955	Charsadda	31.05.1979	17.02.2003	17	do	HM GHS, Zarab Garhi Charsadda	SET S.No 591/2001
411	Muhammad Iqbal MA MEd	28.04.1954	Karak	02.05.1979	17-02-2003	17	do	HM GHS Rehmat Abad Karak	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 593/2001
412	Mr Mistahuddin B.A B.Ed	25.04.1954	Peshawar	09.05.1975	17.02.2003	17	do	HM GHS, Lakan Kaniza Peshawar	SET S.No606 /2001
413	Mr Abdul Khaliq B.A B.Ed	10.03.1954	Mardan	20.06.1976	17.02.2003	17	do	HM GHS, Ghazi Baba Bajour	SET S.No607/2001
414	Mr Gul Muhammad B.A B.Ed	15.12.1954	Malakand	14.06.1979	17.02.2003	17	do	HM GHS, Nehandi Mkd	SET S.No608/2001
415	Mr Hazrat Hussain B.A B.Ed	04.06.1955	Chitral	18.07.1979	17.02.2003	17	do	HM GHS, Barga Nisar Chitral	SET S.No626/2001
416	Mr Shafiqul Haq B.A B.Ed	20.04.1957	Dir	29.05.1977	17.02.2003	17	do	HM GHS, Beyar Dir Upper	SET S.No628/2001
417	Mr Shah Wali Khan B.A B.Ed <i>Rtd</i>	28.06.1954	SWA	11.09.1970	17.02.2003	17	do	HM GHS, Chamtalai Swal	SET S.No631/2001
418	Mr Muhammad Sher Khan B.A B.Ed	02.01.1955	Bannu	17.05.1979	17.02.2003	17	do	HM GHS, Pal Tank	SET S.No636/2001
419	Mr Khalid Khan B.A B.Ed	01.01.1954	Nowshera	15.10.1979	17.02.2003	17	do	HM GHS, Aht: Pura NSR	SET S.No639/2001
420	Mr Khan Gul B.A B.Ed <i>Rtd</i>	13.01.1954	Peshawar	28.12.1977	17.02.2003	17	do	HM GHS, Kafa: Chen Peshawar	SET S.No645/2001
421	Mr Shaida Muhammad B.A B.Ed	30.06.1954	Charsadda	01.12.1973	17.02.2003	17	do	HM GHS, Natzai Charsadda	SET S.No647/2001

attached ss accepts

(Signature)

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SR.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st Entry in Edu; Dept;	Regular apponment / Promtion to the present post			Designation/Place of Posting	Remarks
					Date	BPS	Method of Recriutment		
366	Muhammad Shaiq MSc B.Ed	15/11/1962	Swabi	19/11/1987	31/08/2000	17	By Promotcn	SS Phy: GTHSS Gulbahar Peshawar	sen.aw.vd so(s)1-5/2006 dt 14-02-07 SET S.No 4889/2001
367	Muhammad Sadique M.Sc B.Ed	12/05/1961	Abbottabad	23/05/1988	31/08/2000	17	co	SS Phy: GHSS Lora Abbottabad	vd SO(S/M)/1-5/08/dt 20.05.2011 SET S.No 4899/2001
368	Muht Altaf Hussain M.A B.Ed	23/03/1962	DIKhan	30/03/1983	31/08/2000	17	co	SS English GHSS No.2 DIKhan	vd SO(S/M)/1-5/08/dt 20.05.2011 SET S.No 4900/2001
369	Zee Gohar Saeed MSc B.Ed	01/01/1955	Swabi	17/10/1992	31/08/2000	17	co	SS Phy: GHSS Talash Dir L	sen.aw.vd so(s)1-5/2007 dt 19-12-07 SET S.No 4929/2001
370	Riaz Ahmad MSc B.Ed	02/04/1964	Malakand	07/12/1992	31/08/2000	17	co	SS Stat: GHSS Bathela Swat	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 4933/2001
371	Muhammad Sadique M.A B.Ed	13/01/1954	Haripur	28/10/1984	31/08/2000	17	co	SS Pak Studies GHSS Bareela Haripur	vd SO(S/M)/1-5/08/dt 20.05.2011 SET S.No 4935/2001
372	Muhammad Shoab M.A B.Ed	27/11/1966	Swat	22/01/1990	31/08/2000	17	co	SS Pak Study.GHSS.Kabal Swat	SET S.No 4950/2001
373	Mushtaq Ahmad M.Sc B.Ed	03/04/1963	Abbottabad	18/02/1990	31/08/2000	17	co	SS Phy: GHSS KhwazaKhela Swat	SET S.No 4969/2001
374	Ghulam Sarwar MSc B.Ed	01/03/1963	Mardan	03/12/1985	31/08/2000	17	co	SS Phy: GHSS Wazir Bagh Peshawar	SET S.No 5028/2001
375	Muhammad Salim M.Sc B.Ed	09/02/1965	Karak	10/11/1994	31/08/2000	17	co	SS Phy: GHSS Shakardara Kohat	SET S.No NYA/2001 Required BEd Degree
376	Mr Atta Ullah B.A B.Ed	15/10/1964	Bannu	16/11/2002	31/08/2000	17	co	HM GHS, Masha Mansoor Lakki	do
377	Mr Jehangir Khan MA B.Ed	25/08/1964	Haripur	21/10/1986	31/08/2000	17	co	SS GHSS Panian Haripur	SET S.No NYA/2001
378	Mr Muhammad Zafar Perviz B.A B.Ed	15/04/1954	Abbottabad	01/10/2001	31/08/2000	17	co	DDO (M/P) A.Abad	do
379	Khalil ur Rehman M.A B.Ed	02/12/1955	Moh: Agy	04/05/1986	08/02/2001	17	D/Selectee	HM GHS :Ghafoor khan Killi Khy: Agy:	
380	Aliqur Rehman M.A B.Ed	10/06/1964	Tank	11/12/1988	03/11/2001	17	co	HM GHSS Turan New Tank	
381	Iais Muhammad M.A B.Ed	02/04/1961	Mardan	27/02/1991	03/11/2001	17	co	HM GHS Bunnu	
382	Aman Ullah M.A M.Ed	03/01/1963	Swabi	03.02.2001	03/11/2001	17	co	HM GHS Dohar Swabi	
383	Abdul Qayyum M.A B.Ed	20/01/1965	Kohat	20/04/1991	03/11/2001	17	co	HM GHS jabbar Kohat	
384	Shah Zarin M.A B.Ed	05/02/1966	Dir	07/08/1989	03/11/2001	17	co	HM GHSS Bibiwar Dir U	
385	Zahid Zarnan M.A B.Ed	01/04/1966	Kohat	02/02/1991	03/02/2001	17	co	HM Sharozai Kohat	
386	Khurshid Khan M.A B.Ed	20/10/1962	Lakki	03/05/1990	03/11/2001	17	co	HM GHS Taja Zai Lakki	
387	Asmat Ullah M.A B.Ed	15/02/1966	SWA	21/09/1995	08/02/2001	17	co	HM-GHS, Shinkai, S.W.A.	
388	Malik Khan M.A B.Ed	20/06/1965	karak	17/06/1991	03/11/2001	17	co	HM GHS Jatta Ismail Khel Karak	
389	Abdul Majid M.A B.Ed	01/04/1965	Mansehra	15/03/1992	03/11/2001	17	co	HM GHS Hawaii Mansehra	
390	Aziz Ul Hag M.A B.Ed	01/08/1964	Swat	21/09/1987	16/02/2001	17	co	HM GHS Chuprial Swat	
391	Muhammad Waheed M.A M.Ed M.Phil	04/05/1966	Nowshera	01.05.1989	03/02/2001	17	co	HM GHS Gharib Abad Peshawar	
392	Abdul Hafeez M.A B.Ed	15/03/1964	FRJ Pesh:	04/04/1993	08/02/2001	17	co	HM GHS ,Musa Darra, FR Peshawar.	
393	Safdar Khan M.A B.Ed	15/03/1964	Peshawar	13/05/1992	03/02/2001	17	co	HM GHS Institute PITE Peshawar	

Attested


And Hi 45 45

FINAL SENIORITY LIST OF HEADMASTER/SUBJECT SPECIALIST (MALE B-17) OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA STOOD ON 13-02-2013

SR.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry In Edu; Deptt;	Regular apponment / Promotion to the present post			Designation/Place of Posting	Remarks
					Date	BPS	Method of Recruitment		
1	Umar Muhammad MA BEd SS (Pak.Study)	01.05.1955	Swat	28.02.1989	28.02.1989	17	By Promotion	SS GHSS Khwaza Khela Swat	vd SO(S/M) E&SED/2012/ Incharge SS / Umar Muhammad
2	Tamash Khan M.A B.Ed	17/03/1953	Mardan	01/11/1974	08/11/1995	17	do	HM GHS Hatyan Mardan	vd SO(S/M)/1-5/08/dt 20.05.2011
3	Khalid Khan M.A B.Ed	04/04/1953	Charsadda	04/11/1974	08/11/1995	17	do	HM GHS Babara Chda	vd SO(S/M)/1-5/08/dt 20.05.2011
4	Sher Atzal MA BEd	29/05/1957	Dir (L)	02/12/1978	08/11/1995	17	do	HM GHS Balambat Dir (L)	do
5	Mubarak Shah M.Sc B.Ed	01/09/1966	Moh:Agy:	08/11/1995	08/11/1995	17	do	SS GHSS Ghari Kapora mardan	do
6	Nazir Ahmad. B.A B.Ed	27/06/1960	Abbottabad	12/12/1985	08/11/1995	17	do	HM GHS Gami Noorpur	do
7	Saeed Ur Rehman SS	01.08.1958	Peshawar	10/11/1987	05/05/1995	17	do	SS GHSS Chamkani Peshawar	sen.aw.vd so(s)/s&l/1-4/5 dt 5-9-09
8	Sadiq Ahmad M.A B.Ed	16/08/1953	Malakand	16/11/1974	26/05/1995	17	do	HM GHS Ghani Dher Malakand	do
9	Muhammad Iqbal M.A B.Ed	15/02/1953	Swat	20/11/1975	30/08/1997	17	do	HM GHS Bhari Battagram	do
10	Muhammad Zaman M.A B.Ed	05/06/1954	Dir	20/11/1975	30/08/1997	17	do	HM GHS Dir U	do
11	Allah Nawaz M.A B.Ed	09/12/1953	Dir	25/11/1975	30/08/1997	17	do	HM GHS Sagu DIKhan	do
12	Nek Bal Khan M.A B.Ed	12/04/1953	SWA	05/12/1975	30/08/1997	17	do	HM GHS Spin SWA	do
13	Umar Nawaz Khan M.A B.Ed	21/01/1954	Bannu	13/12/1975	30/08/1997	17	do	HM GHS Hukamzad Dardariz Bannu	do
14	Ihsanud Din M.A B.Ed	03/01/1954	DIKhan	02/07/1976	30/08/1997	17	do	HM GHS Kir Shamozai DIKhan	do
15	Muhammad Asif Khan M.A B.Ed	13/04/1953	Bannu	10/01/1976	30/08/1997	17	do	HM GHS Sero Bada Khel Bannu	do
16	Muzamir Hussain M.A B.Ed	01/08/1953	Mardan	10/01/1976	30/08/1997	17	do	HM GHS Sangao Mardan	do
17	Mir Aslam Khan M.A B.Ed	12/10/1953	Bannu	02/12/1975	30/08/1997	17	do	HM GHS Hakim Bharat Bannu	do
18	Hanim Shah M.A B.Ed	15/01/1964	Kohat	29/06/1967	30/08/1997	17	do	HM GHS Surati Kia Karak	do
19	Abdul Ghafar M.A B.Ed	20/09/1953	Malakand	20/11/1975	30/08/1997	17	do	HM GHS Jalala Malakand	do
20	Umer Nizz Khan M.A B.Ed	14/08/1953	Bannu	14/03/1976	30/08/1997	17	do	HM GHS Mamash Khel Bannu	do
21	Muhammad Manzoor M.A B.Ed	15/02/1954	DIKhan	05/03/1976	30/08/1997	17	do	HM GHS Sheru Koha DIKhan	do
22	Muhammad Khubaz Khan M.A B.Ed	01/03/1953	Bannu	14/04/1976	30/08/1997	17	do	HM GHS Mamash Khel Bannu	do
23	Israrul Haq M.A B.Ed	20/04/1954	Dir	17/04/1976	30/08/1997	17	do	HM GHS Toda Shina Dir Lower	do
24	Muhammad Zafrullah M.A B.Ed	02/10/1953	Mardan	03/09/1976	30/08/1997	17	do	HM GHS Labour Colony Mardan	do
25	Muhammad Zafrullah M.A B.Ed	02/10/1953	Mardan	03/09/1976	30/08/1997	17	do	HM GHS Spin Dhand Kh /Agency	do
25	Wadan Gul M.A B.Ed Rtd	04/08/1955	K/Agency	15/09/1976	30/08/1997	17	do	HM GHS Surat Khan Killi F.R Bannu	
26	Noor Amal Khan. BA B.Ed	05/10/1959	FR Bannu	12/08/1987	11/02/1993	17	do	HM GHS Zurara Khyber Agency	
27	Syed Shoukat Shah BA B.Ed	01/01/1955	Khy Agency	20/06/1979	31/03/1999	17	do	HM GHS Zurara Khyber Agency	
28	Sultan Saeed M.A B.Ed	01/04/1969	karak	10/07/1999	10/07/1999	17	do	SS GHSS Uslerzai Kohat	
29	Munaf Gul M.A B.Ed	01/06/1966	Kohat	05/09/1999	25/11/1999	17	do	SS GHSS Uslerzai Kohat	
30	Younas Ali Khan M.A B.Ed	10/04/1973	Lakki	25/11/1999	25/11/1999	17	do	SS GHSS No. 2 DIKhan	
31	Muhammad Farooq M.A B.Ed	01/10/1969	karak	17/02/2000	17/02/2000	17	do	SS GHSS Gumbat Kohat	
32	Gul Farosh Khan M.A B.Ed	01/05/1969	Swat	10/07/1999	10/07/1999	17	do	SS GHSS Sandori Swat	
33	Sheraz Ahmed M.A B.Ed	10/03/1970	Swabi	17/02/2000	17/02/2000	17	do	SS GHSS Kabqani Swabi	

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attested up

(Signature)

7. That recently the respondents department issue seniority list of Subject Specialist / Head Masters (Male) (BPS-17, of Elementary and Secondary Education Department, as it stood on 13.02.2013, however to the great surprise of the appellant, the Respondent No 4 and No 5 were placed at Sr No 650 and Sr No 377 respectively-i.e senior to the appellant who has been wrongly placed at Sr No 651, despite being senior to them. Copy of the seniority list was however communicated to the appellant on 18.06.2013. (Copies of the seniority list of SETs, (~~Pak Studies~~) and impugned seniority list of Subject Specialist as it stood on 13.02.2013 are attached as Annexure G & H).
8. That the appellant filed his Department Appeal dated 22.06.2013 against the impugned seniority list, however it has not been responded till the expiry of statutory period. *(Copy of departmental appeal is attached as Annexure I)*
9. That the appellant prays for acceptance of the instant appeal inter alia on the following grounds:-

Grounds of Appeal:

- A. That the appellant has not been treated in accordance with law he has been greatly prejudiced and discriminated in the grant of seniority, when his juniors were made senior to him.
- B. That since the appellant is senior to the respondent No. 4 & 5 therefore he is equally entitled to be allowed seniority over and above his juniors
- C. That since the denial of the post of Subject Specialist to the appellant in due time was on account of fault of the respondent department hence it is incumbent upon the respondents to rectify the mistake, allow the appellant his seniority, moreover it is established principle of law that no one should suffer for the default/ fault of the department.
- D. That it is pertinent to mentioned that as per the seniority list of SETs (BPS-16) (~~Pak Studies~~) the Respondent No 4 & 5 were junior to the appellant; moreover they were promoted to Subject Specialist BPS-17 vide the same notification dated 01.01.2008, however when the seniority list of SS BPS-17 has issued the appellant has been wrongly shown junior to them.

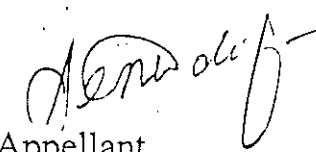
E. That this Honourable Tribunal while accepting the appeal of the appellant vide Judgment and Order dated 22.12.2008 directed the respondents to antedate the promotion of the appellant to the date on which the vacancies were available and he was eligible, however the respondents antedated the promotion of the appellant from 17.02.2003 while the Respondent No 5 has been given promotion from 2000, despite being junior to the appellant which clearly showed that vacancies were available, however the appellant was ignored for no valid reason. It was only after the issuance of the impugned seniority list when the appellant came to know about the fact that Respondent No 5 has been allowed promotion from 31.08.2000.

F. That as per the seniority list of SETs (BPS-16) (~~Pak~~ Studies) the appellant was at Sr No 51 while Respondent No 4 & 5 were at Sr No 52 and 53 respectively, the appellant was never superseded, thus on promotion to higher post he is entitled to regain his seniority albeit he has been wrongly deprived of his seniority.


G. That the appellant has been discriminated against because similarly placed employees were allowed seniority while the appellant has been deprived, hence requires interference / direction from this Honourable Tribunal for correction of seniority.

H. That the appellant seeks the permission of this Honourable Tribunal to rely on additional grounds at the hearing of this appeal.

It is, therefore, prayed that on acceptance of this appeal the impugned Seniority List of the subject specialists (BPS-17) of Elementary and Secondary Education Department as it stood on 13.02.2013, may kindly be set aside / varied / modified and the appellant may be assigned his proper place in the seniority list with all consequential benefits


Appellant

Through


SAJID AMIN
Advocate Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal # 1460/2013.

Mr. Perviz Khan, S.S of District Buner..... **Appellant**

Secretary (E&SE) Khyber Pakhtunkhwa & others..... **Respondents**

Para Wise comments for & on behalf of Respondents.

**Respectfully Sheweth,
Preliminary Objections:-**

1. The appellant has no cause of action/ locus standi.
2. The instant appeal is badly time barred.
3. The appellant has concealed the material facts from this Hon'able Tribunal, hence liable to be dismissed.
4. The appellant has not come to this Hon'able court with clean hands.
5. The appellant has filed the instant appeal just to pressurize the Respondents.
6. The present appeal is liable to be dismissed for non joinder / misjoinder of necessary parties.
7. The appellant has filed the instant appeal on malafide motives.
8. The instant appeal is against the prevailing law and rules.
9. The appellant is estopped by his own conduct to file the instant appeal.
10. The instant appeal is not maintainable in the present form and also in the present circumstances of the issue.
11. The present appeal is not maintainable under the Rules 23 of Service Tribunal Rules 1974.

FACTS.

1. This para is related to the Service record of the appellant, hence need no comments.
2. This para also pertains to academic record of the appellant, hence no comments.
3. This para pertains to record while 22 SETs were promoted as mentioned in this para in accordance with law, rules and policy on the subject other part of the statement of the appellant is false, baseless, with out any cogent legal proof and malafide one.
4. This para pertains to the judgment of this Hon'able court and respondent Department has already implemented the said judgment dated 25-11-2006 in letter and spirit while the appellant never rejected/objected the said implementation well in time, at any proper legal forum.
5. Correct. The appellant alongwith his other colleagues in accordance with law & rules o the subject on 01-01-2008.

- 67 (59) (67)
6. Correct to the extent that the respondent department implemented the judgment dated 22-12-2008 in letter and spirit and antedated the promotion of the appellant (As Annexure E&F of the appeal).
 7. Incorrect. The statement of appellant in this para is against the facts and material on record. The appellant never objected the Tentative Seniority list of S.S & H.M well in time at any proper legal competent forum. Now at this belated stage the appellant has no cause of action while it is also pertinent to mention here that in E&SE Department there is no separate SET (Pak Studies Post) as mentioned in this para hence the statement of the appellant in this para is false, baseless and based malafide motives, hence denied.
 8. Incorrect. The E&SE, Department responded/decided the appeal against the final Seniority list of S.S, H/M (Male) (BS-17) of E&SE, Department stood on 13-2-2013, on 19-12-2013, whereby the appellant was informed that you were placed in the Seniority list of S.S, H/M as stood on 13-02-2013 on proper place (Annexure "A")

ON GROUNDS.

- A. Incorrect, the appellant has been treated in accordance with law and has not been discriminated in the grant of Seniority.
- B. Incorrect, the statement of the appellant in this para is false hence denied.
- C. Incorrect and not admitted. The statement of the appellant in this para is false and based on malafide intention, hence the whole para is denied.
- D. Incorrect. It is pertinent to mention here that there is no SETs (Pak Studies) in Education Department. However, it would not be out of place to mention here that the Seniority of respondent No.5 was antedated w.e.f 31-8-2000 instead of 01-01-2008 in compliance to judgment on 08-10-2009 in S.Appeal No.291/09, of this Hon'able Tribunal while the Seniority of the appellant was antedated w.e.f 17-2-2003 instead of 01-01-2008 in the light of the decision of this Hon'able Tribunal on 22-12-2008 in S. Appeal No. 738/08. Hence the whole para is denied being against the facts law, rule on the subject. (copy of the judgment in Appeal No. 291/09 (Annex-B)
- E. Incorrect, the statement of the appellant in this para is misleading one, with out any support of law rules on the subject hence denied. Detail Reply has been given in para-1).
- F. Incorrect. It is pertinent to mention here that this Hon'able Tribunal has already decide the Seniority of the appellant on 22-12-2008 in S.Appeal NO.738/08 and the department implement the same judgment in letter and spirit and antedated the Seniority of the appellant as prayed i.e 17-2-2003 (Annexure "E" of the Appeal). Hence the appellant has not been deprived of legal right hence there is no cogent legal ground to invoke the jurisdiction of this Hon'able Tribunal for correction of Seniority of the appellant, hence denied.

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G. The respondents seek the permission of this Hon'able Tribunal to adduce more grounds and proofs at hearing of this appeal.

In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the present appeal with cost.

Secretary,
Elementary & Secondary Education,
Department.

(For & on behalf of Respondents No. 1 & 2)

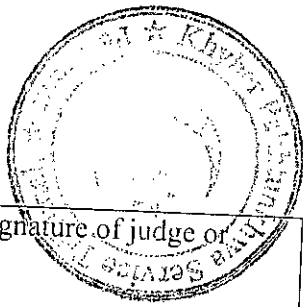
Director
Elementary & Secondary Education,
Peshawar

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Aux "K"



S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
	09.02.2016	<p align="center"><u>KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,</u> <u>PESHAWAR.</u></p> <p align="center">Service Appeal No. 1460/2013</p> <p>Pervaiz Khan Versus Government of Khyber Pakhtunkhwa, through Chief Secretary, Peshawar and others.</p> <p align="center"><u>JUDGMENT</u></p> <p><u>PIR BAKHSH SHAH, MEMBER:</u> - Counsel for the appellant (Mr. Sajid Amin, Advocate) and Government Pleader (Mr. Muhammad Jan) for respondents present.</p> <p>2. Seniority post of the appellant and private respondent No. 4 and 5 were respectively cited at Serial No. 51, 52 and 53 from the copy of the seniority list for SET (BPS-16), copy of which is available on record. Vide notification dated 01.01.2008, they were promoted as Subject Specialists BPS-17 with immediate effect. Feeling aggrieved they filed separate service appeals which were separately decided according to which their promotion was anti-dated from the date of availability of vacancies-cum-eligibility. Consequently vide notification dated 12.11.2012 they were notified as promoted on 17.02.2003 but when the impugned final seniority list of the Subject Specialists dated 13.02.2013 was published, the appellant has been placed at Serial No. 651 as Junior to Private Respondent No. 4 at Serial No. 650 and also to private respondent No. 5 at Serial No. 377. The departmental appeal of the appellant was stated by learned G.P as rejected on the ground that the seniority given to the appellant and private respondents was due to their dates of promotion as Subject</p>

ATTESTED

[Signature]
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar.

Specialists BPS-17, hence this appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.

3. Arguments of the learned counsel for the appellant and learned Government Pleader have been heard and record perused.

4. The above factual position of the case revealed that prior to promotion of the appellant and private respondents, the appellant was senior to the respondents per seniority list of PETs (BPS-16). They were promoted on one and the same date by way of a single notification. Hence prima-facie they should have retained the old seniority position even after their promotion. When their promotion was ante-dated, no reason whatsoever is available on record as to why the appellant was relegated to a junior position? This may also be observed that between the seniority position of the appellant and that of private respondent No. 5, a number of civil servants have been placed, and none of whom has been made party in this appeal. During the course of arguments the learned Government Pleader submitted that the appeal of the appellant has been rejected vide order dated 19.12.2013 but its copy is not available on record. It was inferred that though the departmental appellate authority has not taken the above aspects of the case in view but this Tribunal is reluctant to interfere directly as a number of civil servants have been shown in the seniority list between the appellant and respondent No. 5 who are not parties before us. Since, prima-facie, the appellant is at the receiving end as per impugned seniority list, therefore, the case is remitted to the departmental authority with the directions to look into the matter in the light

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Strictly on merits

of above facts and observations and to decide the matter within
 a period of three months after receipt of this judgment.
 Needless to mention that as the appellate authority will re-
 decide departmental appeal of the appellant, therefore, his
 impugned order dated 19.12.2013 is set aside in these
 circumstances. The appeal is disposed of accordingly. Parties
 are left to bear their own costs. File be consigned to the record
 room.

ANNOUNCED
 09.02.2016

Edl-Pir Bakhtsh Shah,
 Member

Edl-Abdul Latif,
 Member

Certified to be true copy

**PAKISTAN
 Khyber Pakhtunkhwa
 Service Tribunal,
 Peshawar**

Date of Presentation of Application 09-03-2016
Number of Words 1600
Copying Fee 10-00
Urgent 2-00
Total 12-00
Name of Copyist [Signature]
Date of Completion 09-03-2016
Date of Delivery of Copy 09-03-2016



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

No.SO(S/M)E&SED/4-26/2013/Pervez Khan.
Dated Peshawar the July 04, 2016

Amx "K"

72

To

Mr. Pervez Khan,
Principal (BS-18), Govt. Higher Secondary School Dewana Baba,
District Buner.

Subject: - APPEAL AGAINST THE FINAL SENIORITY LIST OF S.S/HM MALE (BS-17) OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT STOOD ON 13-02-2013.

WHEREAS you were appointed as SET (Sc.) on 24-05-1995 in the Education Department You were promoted to the post of Subject Specialist Pak Study (BS-17) GHSS Batara District Buner on regular basis on the recommendations of the Departmental Promotion Committee vide notification date 01-01-2008.

2. AND WHEREAS you preferred appeal No. 738/2008 in the Khyber Pakhtunkhwa Service Tribunal. The service Tribunal announced its judgement on 22-12-2008 and your promotion was antedated w.e.f 17-02-2003 instead of 01-01-2008 as per your prayer before the Court vide notification dated 12-11-2012.

3. AND WHEREAS Mr. Jehangir Khan, Subject Specialist Pak Study (BS-17) GHSS Pania District Haripur preferred appeal No. 291/2009 in the Khyber Pakhtunkhwa Service Tribunal. The Service Tribunal announced its judgement on 03-10-2009 and his promotion was antedated w.e.f. 31-08-2009 instead of 01-01-2008 vide corrigendum dated 20-10-2011.

4. AND WHEREAS your previous departmental representation has already been disposed of vide this Department letter dated 19-12-2013.

5. AND WHEREAS the Service Tribunal Khyber Pakhtunkhwa, vide its judgement dated 02-02-2016 in appeal No.1460/2013 remanded your case to the Department with the direction to re-decide the matter in light of facts mentioned therein strictly on merit within a period of three months after receipt of the judgment.

6. NOW THEREFORE, Your Departmental representation was again considered at appropriate forum as per relevant law/ rules/ policy and the same is rejected/ regretted on the following grounds:-

- Your promotion to Subject Specialist Pak Study (BS-17) has already been antedated as per your own prayer w.e.f 17-02-2003 instead of 01-01-2008 in the light of Court decision dated 22-12-2008.
- Your re-antedation of promotion again to SS (BS-17) is against Law, policy and rules.
- You were placed in the seniority list of SS/ HM (BS-17) as stood on 13-02-2013 on proper place.
- Along with you, promotion of other three Subject Specialists was antedated w.e.f 17-02-2003 vide same notification dated 12-11-2012 but none of them have challenged it in the court.
- As per present position of seniority list, 206 persons are lying between you and Mr. Jehangir Khan who are senior to you. In these circumstances, re-antedation of your promotion will infringe the legal right of 206 persons.
- You have no vested right of antedation of promotion for the second time.



(MUJEEB-UR-REHMAN)
SECTION OFFICER (SCHOOLS MALE)

Endst: Even No. & Date:

Copy of the above is forwarded to:-

- The Registrar, Khyber Pakhtunkhwa Service Tribunal Peshawar w/r to his letter No.293/ dated 22-02-2016 in appeal No 1460/2013.
- The Director, E & S E Department Khyber Pakhtunkhwa, Peshawar w/r to his letter No.3027/AD(Lit-II) dated 18-04-2016.
- District Education Officer (Male), Buner.
- Section Officer (Lit-II), E&SE Department w/r to his letter dated 28-03-2016.
- PS to Secretary, E & S E Department Khyber Pakhtunkhwa, Peshawar.

attested & accepted



SECTION OFFICER (SCHOOLS MALE)