<u>BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR</u>

SERVICE APPEAL NO. 818/2016

Date of institution ... 02.08.2016 Date of judgment ... 22.07.2019

Syed Fazal Abbas Zaidi, Director Physical Education (DPE) Govt. Higher Secondary School, Kachi Paind Khan, D.I.Khan.

(Appellant)

VERSUS

- 1. The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa Civil Secretariat, Peshawar.
- 2. The Director Elementary & Secondary Education, Khyber Pakhtunkhwa near GHSS No. 1, G.T Road, Peshawar City.
- 3. The Secretary Finance Department, Khyber Pakhtunkhwa Civil Secretariat, Peshawar.
- 4. The Secretary Establishment, Khyber Pakhtunkhwa Civil Secretariat, Peshawar.
- 5. Government of Khyber Pakhtunkhwa through its Chief Secretary, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar. (Respondents)

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 ACCORDING TO THE DEPARTMENTAL APPEAL OF THE APPELLANT DATED 08.04.2016 WHICH IS STILL PENDING BEFORE RESPONDENT NO. 1 AND AFTER LAPSE OF STATUTORY PERIOD NO ORDER/COMMUNICATION HAS BEEN MADE ON THE SAME SO FAR.

Syed Younas Jan, Advocate.

For appellant.

Mr. Muhammad Jan, Deputy District Attorney

For respondents.

Mr. MUHAMMAD AMIN KHAN KUNDI MR. HUSSAIN SHAH

MEMBER (JUDICIAL)
MEMBER (EXECUTIVE)

JUDGMENT

MUHAMMAD AMIN KHAN KUNDI, MEMBER: - Our this judgment shall dispose of instant service appeal as well as Service Appeal No. 819/2016 titled "Abdul Sattar Versus The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa Civil Secretariat, Peshawar and four others", Service Appeal No. 820/2016 titled "Muhammad Sharif Versus The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa Civil Secretariat,

Peshawar and four others", Service Appeal No. 821/2016 titled "Mohib Ullah Khan Versus The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa Civil Secretariat, Peshawar and four others", Service Appeal No. 822/2016 titled "Muhammad Gul Versus The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa Civil Secretariat, Peshawar and four others", Service Appeal No. 823/2016 titled "Hameedullah Khan Versus The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa Civil Secretariat, Peshawar and four others" and Service Appeal No. 1050/2016 titled "Fateh Sher Versus The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and four others" as common question of law and facts are involved in all the aforementioned service appeals.

- 2. Counsel for the appellants and Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Arguments heard and record perused.
- 3. Brief facts of all the aforementioned service appeals are that the appellants were serving in Education Department as Physical Education Teachers (BPS-14). They were adjusted against the post of Director Physical Education Teachers (BPS-16) with immediate effect by the respondent-department vide order dated 30.08.2000 they were also regularly promoted to the posts of Director Physical Education (BPS-16) on regular basis with immediate effect vide order dated 18.02.2003. Later on, the appellant Syed Fazal Abbas was upgraded from BPS-16 to BPS-17 on regular basis with immediate effect vide order dated 13.10.2010, the appellant Abdul Sattar was upgraded from BPS-16 to BPS-17 on regular basis vide order dated 15.06.2009 with immediate effect, appellants Muhammad Sharif, Mohib Ullah Khan, Muhammad Gul, Hameedullah Khan and Fateh Sher were upgraded from BPS-16 to BPS-17 on regular basis with effect from 13.11.2007 instead of 15.09.2009 vide order dated 29.04.2014 on the basis of judgment of Service

Tribunal. All the appellants filed departmental appeals in the year 2016 which were not responded hence, the present service appeals.

- 4. Respondents were summoned who contested all the aforementioned service appeals by filing of written reply/comments.
- 5. Learned counsel for the appellant contended that the appellants were serving as Physical Education Teacher (PET) in the Education Department. It was further contended that they were adjusted against the posts of Director Physical Education in their own pay and scales vide order dated 30.08.2000. It was further contended that the appellants were regularly promoted to the posts of Director Physical Education (BPS-16) vide order dated 18.02.2003. It was further contended that later on the appellants were upgraded from BPS-16 to BPS-17 on regular basis on the aforesaid dates. It was further contended that the appellants were fully qualified having qualification of M.A/M.SC Degrees in Health and Physical Education before 30.08.2000 and were also posted as Director Physical Education in Higher Secondary School on 30.08.2000 but the respondent-department have adjusted them on the posts of Director Physical Education in their own pay and scales. It was further contended that later on the appellants were regularly promoted to the posts of Director Physical Education (BPS-16) vide order dated 18.02.2003 and thereafter they were upgraded from BPS-16 to BPS-17. It was further contended that since the appellants were eligible and qualified for the posts of Director Physical Education (BPS-17) before 30.08.2000 and also performing duty as Director Physical Education from 30.08.2000 in Higher Secondary School but they were illegally adjusted on the posts of Director Physical Education in their own pay and scales vide order dated 30.08.2000. It was further contended that the respondentdepartment was bound to regularly promote and upgrade the appellants in BPS-17 on 30.08.2000 instead of adjusting them on the post of Director Physical Education in their own pay and scales as the appellants were highly qualified,

1) Horm

fit, senior and thus were fully eligible and entitled for BPS-17 as personal grade at the time of their first promotion in their own pay and scales. It was further contended that the appellants are very much similar with those who have been granted a similar relief therefore, it was contended that the respondent-department may be directed to award BPS-17 as personal grade to the appellants with all other services benefits from 30.08.2000 i.e from the date of first promotion order of the appellants against the posts of Director Physical Education in higher Secondary Schools till the date of their regular promotion to BPS-17 and prayed for acceptance of all the aforementioned service appeals.

On the other hand, learned Deputy District Attorney for the respondents opposed the contention of learned counsel for the appellant and contended that the appellants were serving as Physical Education Teachers. They were adjusted as Director Physical Education in their own pay and scales vide order dated 30.08.2000. It was further contended that they were regularly promoted to the posts of Director Physical Education (BPS-16) vide order dated 18.02.2003. It was further contended that later on they were upgraded from BPS-16 to BPS-17. It was further contended that the appellants are seeking antedate promotion to BPS-17 from the date of their adjustment vide order dated 30.08.2000. It was further contended that the adjustment of the appellants on the posts of Director Physical Education in their own pay and scales does not create any right of promotion. It was further contended that neither there is any original order nor appellate order therefore, all the aforementioned service appeals are not maintainable under Section-4 of Service Tribunal Act, 1974. It was further contended that the departmental appeals were also filed in the year 2016 after a delay of more than two years therefore, the departmental appeals are also time barred. It was further contended that though the appellants have filed applications for condonation of delay but no cogent reason have been furnished

by the appellants in the condonation of delay applications therefore, prayed for dismissal of all the aforementioned service appeals.

7. Perusal of the record reveals that the appellants were serving as Physical Education Teachers. They were adjusted to the posts of Director Physical Education in their own pay and scales vide order dated 30.08.2000. Later on they were promoted to the posts of Director Physical Education (BPS-16) on regular basis with immediate effect vide order dated 18.03.2003 and thereafter they were upgraded to BPS-17. Though the appellants have claimed that they are entitled for antedate promotion in BPS-17 from the date of their adjustment on the posts of Director Physical Education in their own pay and scales vide order dated 30.08.2000 but it is well settled law that adjustment against the higher posts in their own pay and scale does not create any right for promotion. Furthermore, the appellants were regularly promoted to the posts of Director Physical Education (BPS-16) on 18.02.2003 but they were mum and had not filed any departmental appeal or service appeal and later on when they were upgraded to the posts of BPS-17 then they filed departmental appeals in the year 2016 after delay of more than two years therefore, the departmental appeals of the appellants are also time barred. Though the appellants have filed application for condonation of delay but no cogent reason have been furnished by the appellants in the condonation application which had restrained them from filing departmental appeals therefore, the departmental appeals of the appellants are badly time barred. Hence, without touching the merit, all the aforementioned service appeals are dismissed being time barred. Parties are left to bear their own costs. File be consigned to the record room.

<u>ANNOUNCED</u>

22.07.2019

22.07.2019

Counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today consisting of five pages placed on file, the departmental appeal of the appellant is badly time barred. Hence, without touching the merit of the case, the present service appeal is dismissed being time barred. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED 22.07.2019

(MUHAMMAD AMIN KHAN KUNDI) MEMBER

HUSSAIN SHAH MEMBER 16.04.2019

Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 12.06.2019 before D.B.

(Hussain Shah) Member (M. Amin Khan Kundi) Member

12.06.2019

Counsel for the appellant and Mr. Usman Ghani District Attorney for the respondents present.

Learned counsel for the appellant once again requests for adjournment in order to seek further instructions from the appellant.

The record shows that on so many previous occasions adjournment was sought on behalf of the appellant, therefore, instant matter is adjourned to 22.07.2019 for arguments before he D.B but as a last chance.

Member

Chairman

Due to retirement of Hon'ble Chairman, the Tribunal is defunct. Therefore, the case is adjourned. To come up on 18.12.2018.

READER

Counsel for the appellant present. Mr.-Kabirullah Khattak, Additional AG for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 01.02.2019 before D.B.

(Hussain Shah) Member (Muhammad Amin Khan Kundi) Member

01.02.2019

Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 13.03,2019 before D.B.

Member

Member

13.03.2019

Learned counsel for the appellant and Mr. Kabir Ullah Khattak learned Additional Advocate General present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 16.04.2019 before D.B.

Member

Member

28.02.2018

Counsel for the appellant present. Mr. Muhammad Jan, Deputy District Attorney for the respondents also present. Learned counsel for the appellant submitted rejoinder and requested for adjournment for arguments. Adjourned. To come up for arguments on 03.05.2018 before D.B.

03.05.2018

Member (Judicial) Member(Executive) Due to retirement of the worthy Chairman, the Tribunal is incomplete, therefore the case is adjourned. To come up for same on 17.07.2018 before D.B

17.07.2018

Learned counsel for the appellant and Mr. Zia Ullah, learned Deputy District Attorney present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 07.09.2018 before D.B

(Ahmad Hassan) Member

(Muhammad Hamid Mughal) Member

07.09.2018

Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 31.10.2018 before D.B.

Member

(Muhammad Amin Khan Kundi)

Member

05:06.2017

Clerk of the counsel for appellant present. Mr. Muhammad Adeel Butt, Additional AG for the respondents also present. Due to strike of the bar learned counsel for the appellant is not in attendance. Adjourned. To come up for rejoinder and arguments on 02.10.2017 before D.B.

(GULZZB KHAN)

(MUHAMMAD AMIN KHAN KUNDI). MEMBER

02.10.2017

Learned counsel for the appellant present. Mr. Zia Ullah, Deputy District Attorney for the respondents present. Counsel for the appellant requested for time to file rejoinder. Request accepted. To come up for rejoinder/arguments on 2\mathbb{g}.12.2017 before D.B.

Member (Executive) Member (Judicial)

28.12.2017

Clerk to counsel for the appellant and Addl: AG for respondents present. Arguments could not be heard due to incomplete bench. Adjourned. To come up for arguments on 28.02.2018 before D.B.

Mendos

17.11.2016

Counsel for the appellant and Assistant AG for respondents present. Preliminary arguments heard. According to notification dated 03.06.2003 personal grade BPS-17 were awarded to similarly placed employees. As such the appeal is admitted for regular hearing subject to deposit of security and process fee within 10 days, where-after notices be issued to the respondents for written reply/comments for 09.01.2017 before S.B.

Chairman

09.01.2017

Counsel for the appellant and Additional AG for the respondents present. Written reply not submitted. Requested for adjournment. To come up for written reply/comments on 13.02.2017 before S.B.

Chairman

13.02.2017

Clerk to counsel for the appellant and Addl. AG for respondents present. Written reply not submitted. Requested for adjournment. To come up for written reply/comments on 15.03.2017 before S.B.

(AHMAD HASSAN) MEMBER

15.03.2017

Counsel for the appellant and Mr. Hameed ur Rehman, AD (Litigation) alongwith Addl. AG for respondents present. Written reply submitted. To come up for rejoinder and arguments on 05.06.2017 before D.B.

(AHMAD HASSAN) MEMER 29.09.2016

Counsel for the appellant present. Through the instant appeal, the appellant has impugned order dated 18.02.2003 vide which the appellant was appointed as DPE (BPS-16) on regular basis. The appellant claimed that he should have been appointed in (BPS-17) as personal. Against the impugned order the appellant filed departmental appeal on 8.04.2016 which was not responded within the statutory period.

Since the matter required further consideration of this Tribunal therefore, pre-admission notice be issued to the learned Additional AG to assist of the court. To come up for further proceedings on 27.10.2016 before S.B

27.10.2016

Counsel for the appellant has sent an application for adjournment. Assistant A.G for the respondents present. Adjourned for preliminary hearing to 17.11.2016 before S.B.

Chairman

Form- A FORM OF ORDER SHEET

Court of					
Case No	<u> </u>	818/	2016	·	<u>.</u>

	Case No.	818/2016
S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
. , 1	2	3
. 1	11/08/2016	The appeal of Syed Fazal Abbas Zaidi resubmitted today by Syed Younas Jan Advocate may be entered in the
		Institution Register and put up to Learned Member for proper
·		order please. REGISTRAR
2-	16-8-2016	This case is entrusted to S. Bench for preliminary hearing
		to be put up there on. 31-68-2016
		MANADESD
		MEMBER
	31.08.2016	None present on behalf of the appellant. The
		appeal be relisted for preliminary hearing for
		29.09.2016 before S.B.
		Member

The appeal of Syed Fazal Abbas Zaidi DPE GHSS Kachi Paind Khan D.I.Khan received to-day i.e. on 02:08.2016 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1- In the memo of appeal places have been left blank which may be filled up.

2- Copies of memo of Service appeal and judgment passed on it by this Tribunal mentioned in para-3 of the memo of appeal (Annexure-E) are not attached with the appeal which may be placed on it.

No. 1144/S.T,
Dt. 4/8/2016

REGISTRAR SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Syed Younas Jan Adv. Pesh.

is concerned in this seepert it is submitted that
the appeal No the appellant for intedation No his
from otion order dated 13-10-2010 is still
pending before this Honourable Tribinal
and no croter/Judgment has been passed
on the Sense so far.

Re-Submitted with the above today
on 11.8.2016.

Syed yours J Advocate Peshour

BEFORE THE KHYBER PAKHUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 8/8 / 2016

VERSUS

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Appellant

through(

(Syed Younas Jan () Advocate, Peshawar

PESH AWAR

OI -08-2016

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 8/2 / 2016

Syed Fazal Abbas Zaidi, Director Physical Education(DPE) Govt. Higher Secondary School, Kachi Paind Khan, DIKhan

VERSUS

1. The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa Civil Secretariat, Peshawar.

Khyber Pakhtukhwa Service Tribunal

- 2. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa near GHSS No.1, G.T.Road, Peshawar City.
- 3. The Secretary Finance Department, Khyber Pakhtunkhwa Civil Secretariat, Peshawar.
- 4. The Secretary Establishment, Khyber Pakhtunkhwa Civil Secretariat, Peshawar
- 5: Government of K.PK. through its Chief Secretary, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.

RESPONDENT'S

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1975, ACCORDING TO THE DEPARTMENTAL APPEAL OF THE APPELLANT DATED 92-01-2016 WHICH IS STILL PENDING BEFORE RESPONDENT NO. 1 AND AFTER LAPSE OF STATUTORY PERIOD NO ORDER/COMMUNICATION HAS BEEN MADE ON THE SAME SO FAR. (COPY OF DEPARTMENT AL APPEAL WITH POSTAL RECEIPT IS ANNEXURE 'A').

PPrayer-in-Appeal

edto-day That on acceptance of this appeal, the Department/competent authority may kindly be directed to award BPS-17 as personal. ## grade to the appellant with all other service benefits from 30-08-2000 i.e. the date of 1st promotion order of the 23 appellant against the post of B.P.E. in Govt. Higher Secondary School to the date of his regular promotion to BPS-17.

Respectfully submitted,

The appellant submits as under :-

- That the qualification of the appellant is M.A/M.Sc. in Health & Physical Education (EPE) who passed the prescribed examination held in August, 1991 and whose result was declared on 15-03-1992 .(Copy of the certificate is attached as Annexure 'B').
- That the appelhant was promoted to the post of Director,

 Physical Education (D.P.E) and was posted/adjusted at

 Govt. Higher Secondary School, Will vide order

 dated 30-08-2000 but in his own pay and scale instead of

 BPS-17 personal and then was promoted on regular basis

 vide order dated 18-02-2003 but again in BPS-16 instead of

 BPS-17 as personal grade. (Copies of both the orders are

 attached as Annexures 'C' and 'D').
 - That recently the appellant has been promoted to EPS-17 (regular) vide order dated \(\frac{3}{10/20/0} \) which order has been challenged by the appellant before this Hon'ble Tribunal for intedation of his promotion. (Copy of the same is attached as Annexure 'E').
- That as BPS-17 as personal grade has been awarded to so many other colleagues of the appellant on the basis of their postings in Higher Secondary Schools and possessing M.A/M.Sc. degrees in Health & Physical Education and as on this score the appellant was also entitled for the same relief, therefore, he agitated the matter with the Department through filing a departmental appeal/representation (Annexure 'A' above) before respondent No.1 which is still pending before him and after lapse of statutory period no order/communication has been made on same so far, hence this appeal on the following amongst

other grounds :-

GROUNDS

- A) That the act and omission of the respondents is illegal, un-constitutional, against facts and material on the record therefore, need the interference of this Hon'ble Tribunal.
- B) That the act and omission of the respondents is not only factually incorrect and legally untenable but also is based malafide intention of the respondents.
- C) That the act and omission of the respondents is not only against the well-established principles of natural justice but also is against the laws/Rules/Policies and Notifications of the Provincial Government in this regard.
 - D) That as the status of the Higher Secondary Schools is not more or less from the status of Inter-Colleges so keeping the appellant in his own pay and grade or in BPS-16 is his gross discrimination and is also against the constitutional provision which is neither legal nor justified.
 - E) That as the appellant was highly qualified, fit and senior and thus was fully eligible and entitled for BPS-17 as personal grade at the time of his first promosion in his own pay and grade, so keeping him as such or in BPS-16 is illegal, un-constitutional, against facts and material on the record therefore, is not sustainable in the eye of law.
 - F) That the appellant is/was a Government/Civil serving and legal/constitutional guarantee is/was available to him to be treated equally and in accordance with haw he however, has not been treated as such.
 - G) That the case of the appellant is very much similar and identical with those numerious cases in which not only the higher and superior courts and Tribunals have granted a similar

relief to other colleagues of the appellant but this Hon'ble Tribunal as well as the Department itself has also granted a similar relief to so many other colleagues of the appellant and the appellant is also entitled for the same treatment/relief and the refusal of the same to the appellant is again his gross discrimination.

H) That other grounds available in the circumstances of the case may also kindly be allowed to argue at the time of arguments.

It is, therefore, humbly prayed that on acceptance of this appeal, the department/competent authority may kindly be directed to award EPS-17 as personal grade to the appellant with all other service benefits from 30-08-2000 i.e. the date of first promotion order of the appellant against the post of D.P.E. in Higher Secondary School to the date of his regular promotion to BPS-17. Any other remedy/relief available in the circumstances of the case may also kindly be granted to the appellant.

PESH AWAR

01 -08-2016

Appel l'aut

through

(Swed Youngs Jan) Advocate, Peshawar

AFFI DAVIT

I.S. Fazal Abbas Zaidi, (the appellant) do hereby solemnly affirm and declare on oath that the contents of this appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon ble Tribunal.

WAHMOOD,

Deponent

(5)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

VERSUS

ADDRESSES OF THE PARTIES

APPEL LANT

Syed Fazal Abbas Zaidi, Director Physical Education (D.P.E) Govt. Higher Secondary School, Kachi Paint Khan, Dera Ismail Khan.

RESPONDENT S

- 1. The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar
- 2. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, near GHSS No.1 G.T. Road, Peshawar City.
- 3. The Secretary Finance Department, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 4. The Secretary Establishment, Khyber Pakhtunkhwa Civil Secretariat, Peshawar.
- 5. The Government of Khyber Pakhtunkhwa through its Chief Secretary, Civil Secretariat, Peshawar.

Appellant

through

(Syed Youngs Jan) Advocate, Peshawar

PESHAWAR

0] -0**8**-2016

The Worthy Secretary
Elementary & Secondary Education
Khyber Pukhtoon Khwa, Peshawar.

Annex

Subject: Departmental Appeal/Representation

for BPS-17 Personal Grade from the

date of appointment/Premotion to the

Post of D.P.E. till him date of regularization

of the appellant in BPS-17

Respected Sir,

- That the qualifications of the appellant/applicant are M.Sc in Health & Physical Education HPE who passed the prescribed Examindation in Aug: 1991 and who se result was declared on 15-03-1992
- 2- That the appellant/applicant was appointed/promoted to the post of Director Physical Education (TPE) in the Higher Secondary School vide order dated 30-08-2000 but in his own pay and scale instead of TPS-17 Personal and then was promoted on regular basis vide order 18-02-2003 but again in TPS-16 instead of TPS-17 Personal.
- That PPS-17 Personal is/was awarded to so many other collegues of the appellant working in Higher Secondary Schools possessing the MA / MSc Degrees in Health and Physical Education HPE.
 - That the appellant was very much fit, qualified, fully eligible and thus was fully entitled for award of MPS-17 as Personal Grade but h@\$ illegally, un-constitutionally and malafidely been ignored for the same.

contd...P-2...

Advocate High Court Peshawas
Federal Sauriet Court.



- 5- That not only the Departments, but the Higher/
 Superior Courts and Tribumals including the K.P.K

 Service Tribumal has also awarded the same relief
 to the order Colleagues of the appellant and the

 c3se of the appellent is also at par with the cases
 of his other colleagues therefore the appellant
 is also entitled for award of BPS-17 as Personal

 Grade on this score also.
- That the appellant agitated the matter with the authority time and again but of no use hence this appeal/representation.

Your goodself is therefore requested #r,

that MPS-17 Personal may kindly be awarded to the appellant/applicant from the date of his appointment/promotion i.e.

from 30-08-2000 till the date of award of MPS-17
on regular basis with all other service benefits.

Appellant/Applicant

(Syed Fazal Abbas Zaidi Director, Physical Education, Govt. Higher Secondary School, Kachi Paird Khan, D.I. Khan

Dat ed 6-04-2016

SYED TOURS PAR

M.A.b.B. B. Ed. Certificate black tao
Advocate High Court Pesnawar
Sederal Shariat Court.



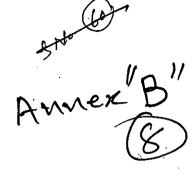
GOMAL UNIVERSITY

DERA ISMAIL KHAN

(N.W.F.P) PAKISTAN



(Session ____1989_90__



of S. GHULAM ARRAS SHAH. and S.FAZAL ABBAS ZAIDI. a student of DEPARTMENT OF HEALTH & PHYSICAL EDUCATION having passed the prescribed examination in _ August, 20 1991, is this day admitted by the GOMAL UNIVERSITY to the DEGREE of MASTER OF SCIENCE in the SECOND Class The subject of examination being ____HEALTH & PHYSICAL REVEATION. The Examination was taken as a whole/in parts. Roll No. 3636 Registered No. 309-Pepu-88 Result Decl.ON: March 15; 👸 1992 Countersigned GHSS, Darabua Kalan D. Mice Chancellor Controller of Examinations

> A.L.B. B. Ed. Certificate Sharin has Advocate High Court Peshawar Federal Sparial Gaurt.

OFFICION THE DIRECTOR SECONDARY EDUCATION NWFP, PESHAWAR.

NOTIFICATION.

Aziz Ullah PET,

GHS, No. 1. Fahar Pur D.I.Khan.

The following qualified SDPE Teachers/Physical Supervisors, in the Education Department in NWFP/FATA due for promotion on seniority Balarc heroby adjusted against the posts of D.P.E.s/A.D.E.O(Phy:) in their own pland Scale are the exigency of service in the interest of public Service on the terms & conditions in vogue or the ones to be framed in future with immediate offect.

offect.	•			N 11
$S_{1}N_{O_{2}}$	NAME & DESIGNATION	WHERE	E ADJUSTED	REMARKS
4.4	Muhammad Akram PET, GUSS, Dara-gezu Lakki Marwat	GHSS,	Ustarzai Kohat	Vacant Post
2,	Shor Azan Khan, PET GHS, Gara Baloch Tank	GHSS,	Richban Abbottabad	dò
ጃ ,	SirajandeDin PET, GHS, Asala Swat.	GHSS,	Khawaza Khela Swat	-do-
4,	Wahid Ullah SET, GHS, Sheikh Uttar Tank.	GHSS,	Darosh Chitral	-do-
5,	Ibrahim-ud-Din PET, GHS, Jandari Karak.	GHSS,	Ilachi Kohat	-do-
6,	Anwar Saced, PET, CHS, Fazal Shah Metta Khel Bannu.		Bareela Hari Pur	-do-
7,	Bahadar Nawaz PET, GHS, Sufaid Dheri Peshawar.		No.2. Peshawar Cant	:t: -do-
8, .	Falsk Naz PET, GUS, Jud Khawar ^M ardan	GHSS,	Manga Dargai Charsa	adda -do-
9,	Noor-We min Physical Supervicor S, W.A.	GHSS,	Khair Abad Nowshers	a -do-
10,	Deedar Knam PET, GHSS, Chumkani Peshawar.	GHSS,	Chamkani Peshawar	-do-
11,	Daud Khan PET, GHS, War Muhammad Lakki Marwat	GHSS,	Madyan Swat	-do-
12,	Muhammad Jalal PET, GMS, Chori Wala Bannu.	GHSS,	Kakici Bannu	-do-
(13,)	Abdul Sattor PET,	GHSS,	Gul Imam Tank	-do-
74,	Jamel Abdul Nasar PMT, GHSS, Bamu.	GHSS,	Totakan Malakand Ag	gency -do-
15,	Muhammad Faisal Phyrical Supervise Orkzai Agency	or GHSS	S, Bari Kot Swat	-do-
16,	Muhammad Nagem, PET GHS, Labour Colony Mardan	GHSS,	Gari Kapura Mardan	-do-
17,	Shoulker Hayat PET, GHS, No. 1. Skha Kot MKD	GHSS,	Kot Malakand Agency	-do-
18,	Bashir Ahmad PET, GHS, Pahar Khel Lakki Marwat	GHSS,	Dousara Charsadda	-do-
19,	Ali Bad Shah PET, GHS, Parshai Kohat	GHSS,	Gumbat Kohat	-do
ال	Sajid Firdus PET, GH3, Jangi A-Abad.	GHSS,	Bignotar A-Abad	-do-
21,	Milhommad Shamal PET, GHSS, Dara-Pozu Lakki Marwat.	G.E.C.	(M) A-Abad	-do- ()
23,	Aqal Daraz PET, PE GHS, Shah Salim Kohat	GHSS,	Tough Bala Kohat	odo-
			•	

GHSS, Kat Garh D.I.Khan

Advocate Fligh Court Pesnar

Page No.2.		
Abdul Majieed Physical Supervisor Khyber Agency.	G.E.C. (M) Peshawar Va	cant Pc
25, Mohib Ullah PET, GHS, Nurar Bannu.	. GHSS, Nizam Pur Nowshera	-do-
26 Muhammad Saced Shah PET, GHS, Paras Mansehera.	ADEO(Phy:) O/O DEO(M/S) Man	sehera -do-
27, S.Bakht Shah PET, GHS, Mansabdar Swabi	GHSS, Zaida Swabi	-do-
Hamid Ullah Khan PET, GHS, Kotla Lodhian D.I.Khan	GHSS, Muryali D.I.Khan	-do-
29, Muhammad Israr PET, GHS, Alo Kili Mardan	GHSS, Dakki Charsadda	-do-
30, Shams-ur-Rehman PET, GHSS, Sher Pur Manshera	GHSS, Sher Pur Mansehera	-do-
31, Muhammad Farooq PET, GHS, Landi-Wah Lakki Marwat	GHSS, Admzai Peshawar	-do-
32, Nameem Khan PET, GHS, Bannu.	Govt: Elementary College H	Pur Odo-
33, Shah Mehmood PET GHS, Ghori Wala Bannu.	GHSS, Urmar Payan Peshawar	-do-
34, Tali Zar PET, GHSS, Kot Long Mardan	GHSS, Kot Long Marden	-do-
35, Rais Khan PET, GHS, Landi Khan Khel Lakki Marwat.	GHSS, Kheshgai Rayam NSR	-do-
36, Inayat Khan PET, GHS, No.1. Rajjar Chd:	GHSS, Umar-zai Charsadda	-do-
37, Sandar Khan PET, GHS, Kharghali Khyber Agency.	GHSS, Palai Malakand Agency	' '-do-
38, Ihtisham-ud-Din PET, GHS, Ghundi Kili Karak	GHSS, Billi Tang Kohat	-do-
39) Abdullah Shah PET, GHS, No1. Tank	-GHSS, Akbar Pura Nowshera	-do-
40, Gul Bad Shah PET, GHSS, No.4, Pechawar City	GHSS, Hazar Khani Peshawar	-do-
41, Muhammad Nawaz PET, GHS, Ranwal Tank.	GHSS, Samar Bagh Dir	-do-
42, Rukh Niaz PET, GHS, Wanda Urangzeb Lakki Marwat	GHSS, Khan Pur A-Abad	-do-
43, Abdul Ghaffar PET, GHS, Lalozai Bannu.	GHSS, Lal Qila Dir	-do-
GHS, Abdul Lakki Marwat	GHSS, Dhodial Mansehera	-do-
GHSS, Korak.	GHSS, Doaba Kohat	-do-
46. Safdar Jan PET. G.T.H.S Peshawar City.	GHSS, No.1. Peshawar City	-do-
47. Fazal-e-Rabi PET GEC(M) Swabi	G.E.C.(M) Swabi	-do-
48, Khaki Rehman Ic/DPE GEC(M) Mirali NWA	GEC(M) Mirali NWA	-do-
Munmand Agency.	GHSS, Utmanzai Chd:	-do-
GHS, Dagal Swabi	GHSS, Gandaf Swabi	-do-
dis, bawat piter Hardan	A.D.E.O(Phy:) O/O DEO(M/S) O	harsadda -do
52, Lal Mar Jan PET, GHS, Shaidan Banda Karak.	GHSS, Shabqadar Fort Chd:	-do-
	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	30.12

	. ,) .
√	Page.No.3. hawazalat Khan PET, HS, Surgha SWA.	GHSS, Ziarat Talash Dir Vaca	nt Pòst
54. A	hmad Nawaaz PET, HS, Shabaz Ahmad Khel Bannu.	GHSS, Darband Mansehera	-do- \
55. Z	arbahisht Khan PET HS, No.1. Buner. ()	GHDS. Nawagar Durot	do-
56, s	.Ibad Ur Rehman PET, "HS, K Lakkari Muhmand Agency.	Ghaa, Osh Dii	.do
G	iramat Ullah PET, HSS, T.Nasrati Karak.	Gudd Dogata racers	-do
G	Salar Khan PET, HS, Gujrat Mardan Rashi Din PET		-do-
166)	HS, Paloski Karak.	GHSS, Khon Pur Dir	do-1
61. I	HS, Kachi Pind Khan D.I.Khan Falak Naz PET, HS, Dheri Saidan Bannu.	G.E.C.(Tahan) Malakand Agency	-do-
62. 1	Fazal Wahid PET, GHS, Chakdara Dir.	GHSS, Bat Khela Malakand Agency	⊶do~
	Mushtaq Khan PET, GHS, Mandan Bannu. Arbab Fawad Khalil PET	GHSS, Mathra Peshawar GHSS, Pir Pai NSR	-do-
	GHSS, Pir Pai NSR Habib Ullah PET,	G.E.C.(M) Dir	#do=
66	GHSS, No1. Bannu. Mujeeb Ur Rehman PET, GHS, Ghundi Shamshaki Karak	GHSS, Shakar Dara Kohat	-do-
1 67.	Muhammad Javed FET GHSS, Nawan Sher A-Abad.	ADEO(Phy:) O/O DEO (M/S) Abbotts	abad -do-
	Jehan Alam PET, GHS, Topi Buner.	GHSS, Mingora Swat GHSS, Dhaldei D.I.Khan	-do-
69,	Abdul Qadeer Khan PET, GMS, Daiyal D.I.Khan Chamni Khan PET,	GHSS, Kab Ganl Swabi	- do→
70, (71)	GMS, Khan Pur Mardan. Amjad Khan PET,	GHSS, Sher Pao Chd:	-do-
. 72,	GMS, Ziarat Kili Chd: Nekhat Ullah PET, Ic/DPE GEC(M) Kotka Habib Ullah FR Ba	GEC(M) Notka Habib Ullah FR Ban	nudo-
73,	- A	G.E.C (M) Mathra Peshawar	-do-
74)	Muhammad Usman PET, GHSS, No. 3. D.I.Khan	GHSS, Darlihne Kalan D.I.Khan	-do-
75 , 76 ,	Waris Khan PTC GPS, Sher Zaman Dalo Khel Lakk Muhammad Nawaz PET,	GH33, Munda D1r i Marwat GHSS, Shabaz Garhi Mardan	⊶do
77,	GHS, Nawan Kili Swabi. Ihsan Ullah PET,	auss Fotoh Pur Swat	2 -do-
78,	GHS, Bidara Swat. Ashraf Ali PET, GHS, Ismaial Khel Bannu.	GHSS, Biroate A-Abad	MARISIAN
79,	Zahoor Zaman PTC, GPS, Emal Khel Bannu.	GHSS, Kalam Swat	on Court Pest
80,	Tawab Ali Shah PET GHS, Mama Khel Banochi Bannu.	GHSS, Tarbela Town Ship France P	ur →do- do-
81,	Fatch Sher PET, GMS, Wanda Baloch D.I.Khan.	Onso, radat swat	

Page.No.4. -GHSS, Kot Najeeb Vllah Hari Pur Muhammad Sharif PET. GHS. Rotha D.I.Khan. -do-Said Khan PET, GHSS, Lora A-Abad' GHS, Toran (NAU) Tanic. -do 84. Q. Ekrom Ullah PET, GHSS, Bagh Maidan Dir GHS, Bazar Ahmad Bannu. -do-Ghulan Hussain PET, GHSS. Totalai Buner 85, GHS, Rustam Mardan. -do-GHSS, Pir Saddi Mardan Ghulam Nabi PET, 86, GHSS; Gujar Ghari Mardan 87 -do-Muhammad Gul PET. GHSS, No2, D.I.Khan GHSS; No.2. D.I.Khan. 88. Rais Ullah PTC. --do--GIISS, Charbagh Swat GPS, Sikotri Jabbar Bannu, Nasiŕ Khan PET, GEC(M) Mansehera -do-89, GHS, Bahadari D.I.Khan -do-9Ò, Zahoor Ahmad PET. GHSS. Jalozai Nowshera GHS, Spin Khak NSR. Muhammad Haroon PET, -do-91, GHSS. Ismaila Swabi GHSS, Ismaila Swabi Muhammad Iqbal PET, 92. GHSS. Natiagali A-Abad. -do-GHS, Zangi Khel Lakki Marwat. Farman Ullah PET, Kotka GHSS, Nawan Sher A-Abad –do≖ GHS, Kotka Saadat Khan Bannu.

GMS, Kachozai Bannu.

Ikram Ullah PET,

94,

1, Charge report should be submitted to all concerned.

GHSS. Siri Kot Hari Pur

2, The promotion of the above condidates is subject to the approval of the Departmental Secotion Committee.

> (S.ABU SACED BACHA) Director Secondary Education NWFP Peshaway

Endst: No. 9189-9439

Dated. 30-08-

/20000]

Copy forwarded for information and n/action to the:-1, Director Bureau of Curr: Dev: & Edu: Extensions Services NWFP, Abbottabad.

2, Director of Education FATA NWFP, Peshawar

3, Director Primary Education NVFP, Poshawar.

4, Accountant Genernal NWP, Peshawar.

5, All District Education Officers concerned Secondary and Primary Male in NWFP. 6, Egency Education Officers concerned.

7, All District Account Officers concerned in NWFP.

8, All the Principals /Head Masters concerned in NWFP.

9, P/S to Secretary to Govt: of NWFP, Education Department.

10, P-A to Director Secondary Education NVFP, Poshawar.

Director

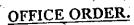
Jan Sher 30082000 for/ Director Secondary Education NWFP, Peshawar.

EVED DATATE IAN

L.B. 8 Ed, Certificate Shatta bed &dvocate Righ Court Peshawas Bederal Spariat Court.

-do-

DIRECTORATE OF SCHOOLS AND LITERACY N.W.F.P. PESHAWAR.



Annex D"(13)

Consequent upon the approval by the Departmental Selection Committee Schools & Literacy NWFP in its meeting held on 26-12-2002. The following CT/PET/PTC, etc are hereby promoted to the posts of DPE/ADO (Physical) B-16 on regular basis in the interest of public service with immediate effect.

- 1				Remarks
#\	Name & Designation	Promoted	Place of posting :	
- 1		35	GEC, Ghori Wala Bannu	Against the post already occupied by him
	Mr. Sher Azam Khan PET	DPE	GHSS, Khowaza Khela Swat	Against the post already occupied by him
	Mr. Siraj-ud-Din PET	DPE	GHSS, Kuowaza Kucia owai	Against the post already occupied by him
	Muhd Ibrahim-ud- Din PET	DPE	GHSS No.2 Pesh:Canntt:	Against the post already occupied by him
	Mr,Bahadar Nawaz PET	DPE	GHSS Manga Dargai Charsadda	Against the post already occupied by him
- 1	Mr.Falak Naz PET	DPE	GHSS Chamkani Peshawar	Against the post already occupied by him
	Mr, Deedar Khan PET	DPE	GHSS Kakki Bannu	Against the post already occupied by him.
	Mr, Muhammad Jalal PET	DPE;	GHSS Gul Imam Tank	Against the post already occupied by him
	Mr, Abdus Sattar PET	DPE	GHSS Totakan Mkd Agy	Against the post already occupied by him
	Mr, Jamal Abdul Nasir PET	DPE	GHSS Daag Peshawar	Against the post already occupied by him
0	Muhd Faisal Phy: Supervisor	DPE	GHSS Ghahri Kapura MDN	Against the post already occupied by him
1	Mr, Muhammad Nacem PET	DPE	GHSS Kot Malakand Agy:	Against the post already occupied by him
	Mr, Saukat Hayat PET	DPE :	GHSS Doschra Chare and a	Against the post already occupied by him
3	Mr. Bashir Ahmad PET	DPE	GHSS Dara Pezu Lak. t	Against the post already occupied by him
4	Mr. Shamal Khan PET	DPE	GHSS Tough Bala Kohat	Against the post already occupied by him
5	Mr, Aqal Daraz PET	DPE	GHSS Kotgarh D I Khan	Against the post already occupied by him
6	Mr, Azizullah Khan PET	DPE	GEC (M) Peshawar	Against the post already occupied by him
7	Abdul Majeed Phy: Supervisor	DPE	GEC (M) Pesnawar GHSS Nizampur NSR	Against the post already occupied by him
8	Mr, Muhibullah PET	DEL	GHSS Kawai Mansehra	Against the post already occupied by him
9	Mr,M,Saeed Shah PET	DPE		Against the post already occupied by him
20	Mr. S.Bakht Shah PET	DPE	GHSS Zaida Sawabi	Against the post already occupied by him
21	Mr. Hameedullah Khan PET	DPE	GHSS Dakki D,I,Khan	Against the post already occupied by him
22	Mr. Muhammad Israr PET	- DPE	GHSS Bughdad Mardan	Against the post already occupied by him
23	Mr, Naeem Khan PET	DPE	Phy:Edu:Collage Karak	Against the post already occupied by him
24	<u> </u>	DPE	GHSS Urmar Payan Pesh:	Against the post already occupied by him
25	Mr, Tali Zar Khan PET	DPE	GHSS Katlang Mardan	Against the post already occupied by him
26	1	DPE	GHSS !Cheshgai NSR	Against the post already occupied by him
27		DPE	GHSS UmarZai Chd:	
28		L PE	GHSS Mayar Mardan	Against the post already occupied by him
29		DPE	GHSS Bilitang Kohat	Against the post already occupied by him Against the post already occupied by him
30	(-,	DPE	ADO (Phy:) at EDO (S&L)Tank	
31		E≯E	GHSS Khanis Pur Abbottabad	Against the post already occupied by him
32		DPE	GHSS Lal Qilla Dir	Against the post already occupied by him
3.	.1	DPE	GHSS Hazar Khwani Pesh:	Against the post already occupied by him
34			Griss Doaba Kohai	Against the post already occupied by him
3		DPE	GHSS No.1 Peshawar city	Against the post already occupied by him
3.	1 :	DPE	GHSS Totalai Buner	Against the post already occupied by him
3		DPE	GEC (M) Mir Ali NWA	Against the post already occupied by him
38	54	DPE	GHSS Gandaf Swabi	Against the post already occupied by him
39		DPE	ADO(Phy) at EDO(s&L) Charsadda	
40		DPE	GHSS Shabqadar For, hid:	Against the nost already occupied by him
4		DPE	ADO(Phy:) at EDO(s&L) Battagran	
4	<u></u>	DPE	ADO (Phy.) at EDO(\$&L) Buner	Against the post already occupied by him
4	3 · Mr. Kiramatullah PET '	DPE	GHSS Bogara Karak	Against the post already occupied by him
4		DPE	GHSS Baghicha Dheri Mardan	Against the post already occupied by him
4	<u> </u>	DPE	GHSS Warana Karak	Against the post already occupied by him
4	6 S.Fazal Abbas Zaidi PET	DPE	GHSS Utmanzai Charsadda	Against the post already occupied by him
4	7 Mr. Falak Naz PET	DPE	GHSS Adezai Peshawar	Against the post already occupied by him
4	8 Mr. Fazli Wahid PET	DPE	GHSS Khanpur Dir	Against the post-already occupied by him
-	9 Mr. Mushtaq Khan PET	4 DPE	GHSS Wazer Bagh Peshawar	Against the post already occupied by him

Advocate bight Comment Cawas



		<u> </u>		
51	J	DPE	GEC (M) Dir	Against the post already occupied by hun
. 52	Mr. Mujcebur Rehman PET	DPE	GHSS Shakar Dara Kohat	Against the post already occupied by him
53	Mr. Jehan Algen PET	DPE	ADO (Phy:) at EDO(S&L) Shangla	Against the post already occupied by him .
54	Mr. Abdul Qadeer Khan PET	DIE	OHSS, Parova D.I.Khan	Against the post already occupied by him
55	Mr. Chamni Khan PET	DFE	GHSS, Takkar GHSS Mardan	Against the post already occupied by him
56	Mr. Amjad Khan PET	D! E	GHSS Sherpao Charsadda	Against the post already occupied by lum
57	Mr. Nikhat ullah PET	DFE	GEC (M) Kotka Habibullah FR Bamm	Against the post already occupied by him
58	Mr. Farid Zaman C.T.	. DPE	Phy:Edu:Collage Karak	Against the post already occupied by him
59	Mr. Ikramullah PET	DPE	GHSS Sirkot Haripur	Against the post already occupied by him
60	Mr. Muhammad Usman PET	DPE	GHSS Muryali D.I.Khan	Against the post already occupied by K.
61	Mr. Waris Khan P.T.C.	DPE	GHSS Munda Dir Lower	Against the post already occupied by him
6	Mr. Muhammad Nawaz PET	DPE	GHSS Shabaz Gliari Mardan	Against the post already occupied by him
63	Mr. ihsan Ullah PET .	DPE	GHSS Fatehpur Swat	Against the post already occupied by him
64	Mr. Ashraf Ali Khan PET	DPE	C., SS Ustarzal Kohat	Against the post already occupied by him
65	Mr. Zahoor Zaman P.T.C.	DPE	GHSS Kalam Swat	Against the post already occupied by him
66	Mr. Fatch Sher PET	DPE	GHS\$ Kabal Swat	Against the post already occupied by him
67	Mr. Muhammad Sharif PET	DPE	GHSS Kot Najibullah 11/Pur	Against the post already occupied by him
68	Mr. Said Khan PET	DPE	GHSS Lora Abbottabad	Against the post already occupied by him
	Mr. Ghulam Hussain PET	DPE	GEC(M) Mardan	Against the post already occupied by him
70	Mr. Ghulam Nabi PET	DPE	GHSS Takh Bhai Mardan 🕠	Against the post already occupied by him
71	Mr. Muhammad Gul PET	DPE	GHSS No.2 D.1.Khan	Against the post already occupied by him
72	Mr. Racesullah P.T.C.	ЭPE	GHSS Charbagh Swat	Against the post already occupied by him
73	Mr. Nasir Khan PET	DPE	ADO (Phy:) at EDO (S&L)Hangu	Against the post already occupied by him
74	Mr. Zahoor Ahmad PET	DPE	GHSS Jallozai Nowshera	Against the post already occupied by him-
75	Mr. Muhammad Haroon PET	DPE	GHSS Ismaila Swabi	Against the post already occupied by him
76	Mr. Muhammad Iqbal PET	DPE	GHSS Turbela T.Ship H/Pur	Against the post already occupied by him
77	Mr. Farmanullah PET	DPE	GHSS Pir Pai Nowshera	Against the post already occupied by him

Note: -

- 1. Charge report should be submitted to all concerned.
- 2. No TA/DA etc: are allowed.

(HAFIZ BAHADAR KHAN) Director Schools & Literacy NWFP Peshawar

Endst No. 3542-3628 /A-14/Promo:/DPE B-16. Dated Peshawar the 18/2 /2003 Copy of the above is forwarded for information & necessary action to the: -

- 1. Director of Education (FATA) NWFP Peshawar.
- 2 Director Bureau and Teacher Education NWFP Abbottabad.
- 3. Accountant General NWFP Peshawar.
- 4. Executive District Officers (Schools & Literacy) in NWFP.
- 5. District/Agency Accounts Officers in NWFP.
- 6. Principal GEC (M) concerned.
- 7. Principal Govt: College of Physical Education Karak.
- 8. Principal GHSS concerned.
- 9. PS to Minister for Education NWFP Peshawar.
- 10. PS to Secretary Schools & Literacy Department Govt: of NWFP Peshawar.
- 11. DPE/ADO Physical concerned.
- 12. PA to Director Schools & Literacy NWFP Peshawar:

Deputy Director Establishment Directorate Schools & Literacy

NWFP Peshawar

Advocate High Court Peshawas
Federal Spariat Court.



GOVERNMENT OF THE KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 13-10-2010

NOTIFICATION

NO.SO(PE)2-6/E&SE/DPCMEETING/10: Consequent upon the recommendations of the Departmental Promotion Committee, the competent authority is pleased to promote the following nine (9) Maie & four (4) Female DPEs (BS-16) to the upgraded post of DPE (BS-17) on regular basis with immediate effect:

រឯជិប	aded p	ost of of E (bo try)		
	MALE	DPEs	101-206	Remarks
1	S.No.	Name & Designation of	Proposed Place of Posting	
.	·	Officers	GHSS Panian Haripur	Against vacant post of DPE
1	1.	Akbar Ali Khan DPE/ADO (Sports) in Office of		0/1//2
;	- i 	EDO (E&SE) Kohot	GHSS, Akbarpura	Against DPE post
Ī	2.	Abdul Ghaffar ORBy MGHSS Akbarpura	Nowshera	already occupied by
-		Newshora	GHSS Garni Habibullah	-(10-
	3.	Fazal Ahbas	Maschra	Y
	į	DPE GHSS Garhi . hicoibullah		
		Mansehra	GASS, Shanoaz	
: 	4.	Muhammad Rasool DPE GHSS Shahbaz Khei Lakki	· Charleston	
, ~		Marwat.	GHSS, Chaghar Malti	-do-
	5.	Qadar Khan DPE SHS\$ - Chagnar	Peshawar.	!
••!	i , !	Matti Peshavar	l - GHSS, Monga Mardan	Alo
	, 5.	PElda Muhammada	5,100, mang-	
		DPE GHSS Manga Marcian	GHSS Inaliage Peshawar	Against vacant post of DPE.
i .	7.	[Mamrez Khan) in the Office	1	0,012
•	i	OF ED O(ESSE) Karak	Gredo, Hazim Havid	Against DPE post
	5.	Racesuliah CPE GHSS Hakim Haved	Barino	diready ocsupied by him.
	• •	Bannu	GHSS, Chorlaki Kohat.	-do-
	9.	Pamarud Snah	CHISO, Onsumer	
	Ĺ	DPE GHSS Cheriaki Kongt.		

SEMALS DPES

S.No.	Name 3 Designation of	Proposed Place of Posting	Remarks
	Officers Mist Misbah Seema DPE GGHSS Parova DIKasa	GCHSC Parova DIKhan	Against DPE post already accupied by her
	Mst. Ghazala Nagem	CGHSS, Lachi Kohat.	-co-
3	Mst. Baseerst Afzal DPE GGHSS Handhand	CGHSS Hanchand Charabeda	-do-
4.	Charsadda. Mstrikaheela Bano DPE GCHSS No.5 Casaban	GGHSS, No E Gasaban Cikhan	-06-
	DIKhan.		

2. On their promotion the officers will be on probation for a period of one (1) year in terms of section 6(2) of RWFP Civil Servant Act 1973 read with Rule 10(1) of the NV/FP Civil Servant (Appointment Promotion and Transfer; Rules

M.A.L.B. * EJ. · ertificate blarm bat Advocate High Court Posbawas Faderal hourist Court.



SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst; of even no. & date:

- Secretary to Govt of Khyber Pakhtunkhwa, Establishment Department, Copy is forwarded to:-1)
 - Special Secretary (Regulation), Establishment Department, Govt of Khyber Pakhtunkhwa Peshawar. 2)
 - Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department, 3)
 - Secretary to Chief Minister Khyber Pakhtunkhwa.

4)

- PS to Chief Secretary Khyber Pakhtunkhwa. All Directors in Elementary & Secondary Education Department Khyber 5) -6)
- Executive District Officers Elementary & Secondary Education 7)
- The Accountant General Khyber Pakhtunkhwa. All District Accounts Officers /Agency Accounts Officers concerned 8)
- PS to Minister for Elementary & Secondary Education Department 9) 10) -
- PS to Secretary i Special Secretary / Additional Secretary E&S Édu: 11)
- Deptt Govt of Knyber Pakhtunkhwa. PA to Deputy Secretary (Admn) Elementary & Secondary Edu: Department Govt of Khyber Pakhtunkhwa. 12)-
- Officers concerned 13)

Master file 14)

> (ARIF JAMIL) SECTIONOFFICER (PRIMARY)

> > M.A.L.S. B EJ, Ceruficate Sherie 640 Advocate High Court Peshawas Pederal Secrial Court

Annen "F"

SUBSTITUTED BEARING THE SAME NO.

GOVERNMENT OF NWEP SCHOOLS & LETERACY DEPTT: No. SO (B& A)/2-1/2003/DPEs. Dated Peshawar, the 03.00,2003.

An order to implement the judgement of Suprema Court of Pakistan vide NOTIFICATION dated 12.03.2003 the Government of NWFP is pleased to award BPS-17 as personal to the following officers of Schools & Literacy Department from the date of regular appointment or acquiring Master Degrees which ever is relevant.

of regular appointment or acquiring Sr. No. Name & Designation	Date of Acquiring	Date of appointment.
Sr.No. Name & Designer	Master	•
land.	Degrees. 21.10.1986.	
Gul Aslam DPE GHSS Khairabad Nowshera. Gul Said khan DPE GHSS Tekhal	•	22.10.1990.
2. Peshawar. 20 (Physical) O/O EDO	30.05.19 ⁸⁸ .	, ,
2. Peshawar. Misal Khan A.D.O. (Physical) O/O EDO (S&L) Peshawar. Anwar Zad DPE GHSS S.K. Bala Bannu. Anwar Zad DPE GHSS O/O EDO	31.12.1989 31.12.1989	
5. Sheraz khan Abo (Lawer)	13.12.1992 17.09.1995	-do- -do-
6. Janoosh Khan DPE GHSS Bluar of Janoosh Khan DPE GHSS Dhodial Muhammad Bashir DPE GHSS Dhodial Mansehra)		GOVT: OF NWFP

SECRETARY TO GOVT: OF NWFP SCHOOLS & LITERACY DEPTT:

15/2003. Endst. No. FD (PRC) /B-81/2003, Dated Peshawar, the Copy of the above is forwarded for information & necessary action to:

- The Accountant General NWFP, ashawar.
- The District Account Officer Nowshera. 1)
- The District Accounts Officer Bannu. 2)
- The District Accounts Officer (Dir Lower). 3)
- The District Accounts Officer (Manschra). 4) 51
- The District Accounts Officer (swat). 6)

(SYED BAQAR SHAH) SECTION OFFICER (SR-1)

Endst. Of even Number & date.

Copy of the above is forwarded to:-The Director of Schools & Literacy NWFP, Peshawar.

The Section officer (SR-1) Finance Deptt: w/r to his letter No. FD (PRC)/8-1)

81/2003, dated 21.05.2003. The Executive District Officer (School & Literacy) Bannu. 2)

The Executive District Officer (School & Literacy) Nowshera. The Executive District Officer (School & Literacy) Dir Lower.

The Executive District Officer (School & Literacy) Swat. 4) 5)

The Executive District Officer (School & Literacy) Mansehra.

The Executive District Officer (School & Literacy) Peshawar . 6) 7)

ald date as 13-12-94 (MANZOOR HUSSAIN)

Ne been replaced as 17-12-95 ECTION OFFICER (B&A)

New been sound of D. III

Poderus Spierest maurt, is

GOVERNMENT OF NWFF EDUCATION DEPARTMENT.

Dated Peshawar, the 07-05-2001.

Annex

NOTIFICATION.

NO. SO(E-III)2-1/DPEs. The Competent authority is pleased to accord sanction to the award of BPS-7 to Mohammad Hashim Khan Director Physical Education, (BPS-16) Government Higher Secondary School No.1, Peshawar Cantt: with effect from 10 February, 1991 on the basis of Master Degree in Physical Education, possessing at the time of his appointment in 1991 i.e prior to the date of issuance of Notification No. FD(SR-I) 6-36/93, dated 3th August 1993, where by the hearlit of grant of B-17 to DPE, on the basis of Master Degree in Physical Education was withdrawn.

SECRETARY TO GOVT: OF NWFP, EDUCATION DEPARTMENT

Endst. No. FD(SR-1)6-36/2000/Vol-11

Dated Peshawar Copy forwarded to the Accountant General, NWFP, Perlawa

SECTIONOFF (CER (SNJ)

Endst: No. & date even.

Copy forwarded for information and necessary action to:-

The Director Education (Secondary), NWTP, Peshawar.

The Section Officer (SR-I), Gove of NWFP, Finance Department, Peshawar w/r to his letter No. ED (SR-1) 6-36/2000/Vol-11, Dated 12-03-2001.

The Section Officer (Schools). Govt: of NWFP, Edu: Depti: Peshawar.

The District Education Officer (Male) Secondary, Peshawar.

Principal GHSS, No.1, Peshawar Cantt:

The Officer concerned.

SECTION OFFICER(E-III)

Svocate High Court Peshaws

20

BEFORE THE KHYBER PAKHUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No.	/ 2016	,
Syed Fazal Abbas Zaidi	• • • • • • • • • • • • • • • • • • • •	APPELLANT
VERSUS		_

The Secretary E&SE, K.P.K etc RESPONDENTS.

APPLICATION FOR CONDONATION OF DELAY (IF ANY).

Respectfully submitted:

The applicant/appellant submits as under:-

That firstly the act and omission of the respondents /department is illegal, unconsitututional and void and secondly as financial matter is involved in the matter and the ause of action is the running cause of action, therefore, no limitation runs against the appellant/applicant, but even if this Honourable Tribunal considers the departmental appeal time barred then this application for dondonation of delay if any on the following amongst other grounds:-

GROUNDS:

- That in the matter in hand the cause of action is continuous cause of action and the impugned act and omission of the respondents come in the purview of the definition of continuous wrong, therefore, in the matter the cause of action starts on first date and ends on the last date of every months/every year, therefore, no question of delay arises in the matter.
- 2. That the law requires that the matters should/must be decided on merits rather than on technical grounds including the limitation.



- That the appellant/applicant has got a very good case in his favour therefore, technicalities including the point of limitation(The delay if any) are ignorable.
- That the appeal of the appellant before this
 Henourable Tribunal is well within time and strictly in
 accordance with law contained in Section 4 of the
 NWFP now Khyber Pakhtunkhwa Service Tribunal Act 1974,
- 5. That if the delay if any is not condoned the applicant/appellant will suffer an irreparable loss to his seniority, promotion and all other service benefits.
- That the delay if any has been caused by the delaying tactics of respondents/department and the appellant cannot be held responsible for the same. Specially in the presence of the principles of legitimate expectancy.

 7. That in so many similar indicates.
- 7. That in so many similar and identical cases this

 Honourable Tribunal has ignored the point of limitation
 and in so many cases has condoned the delay, therefore,
 in this case also the same point is ignorable/condonable.

It is, therefore, respectfully prayed that on acceptance of this application in the best interest of justice the delay if any in filing departmental appeal may kindly be condened/ignored and the appeal of the appellant/applicant may kindly be decided on merits. Any other remedy/relief available in the interest circumstances of the case may also kindly be granted to the applicant/appellant.

Dated 01/8 /2015

Applicant/appellant

Through

Advocate Peshawar High Court

Peshawar.

(22)

BEFORE THE KHYBER PAKHIUNKHWA SERVICE TRIBUNAL, PESHAWAR

\$	Service	e Appea	al No.	/ 2016	,
Sy ed	Fazal	Abbas	Zaidi		APPELLANT
		UET	Dollo		

VERSUS

The Secretary EASE K.P.K. and others RESPONDENTS.

AFFIDAVIT.

I, Syed Fazal Abbas (appellant) to hereby solemnly affirm and declare on Oath that the contents of the attach application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal

Dated 0 / 8 / 2016

Deponent St Abbas



العرال مرد المرد المرد

باعث تحرميا نكه

مقد مدمندرج عنوان بالا میں اپن طرف سے واسط بیروی وجواب دہی وکی کاروا کی متعلقہ اس میں کی سے معروف کو بھواب دہی وکی کاروائی متعلقہ مقرر کرے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو بقد مدمی کل کاروائی کا کامل اختیارہ وگا۔ نیز وکیل صاحب کوراضی نامہ کرنے وتقرر فالت و فیصلہ برطف دیے جواب دہی اورا قبال وعوی اور المسمولی لیسمورت و گری کرے اجراءا درصولی چیک ورو بیدار عرضی دعوی اور درخواست برتم کی تصدیق نرای پردستخدا کرانے کا اختیار ہوگا۔ نیز صورت عدم بیروی یا ڈکری کی مطرفہ یا ابیل کی برامدگی اور منسوفی نیز دائر کرنے ابیل نگرانی ونظر فانی و بیروی کرنے کا اختیار ہوگا۔ از بصور سفرورت مردرت مردرت مردرت مردرت مردرت موسول یا مختیار تا تعالی اور اس کام اختیار کوگل یا جزوی کاروائی کے واسطے اور و کیل یا مختیار قاتیا رات حاصل ہوں کے اور اس کام اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی دہی جمل میں جوخر چدد ہر جاندالتوا کے مقد مدے سب سے و ہوگا۔ کوئی تاریخ بینی مقام دورہ پر ہویا حدے ہا ہر ہوتو و کیل صاحب پابند ہول ہے۔ کہ بیروی مذافی کے مدین کے مدین کے مدین کے مدین کے مدین کی مدین کے مدین کے مدین کے مدین کے مدین کے مدین کی مدین کے مدین کی کوئی تاریخ بینی مقام دورہ پر ہویا حدے ہا ہر ہوتو و کیل صاحب پابند ہول ہے۔ کہ بیروی

الرقوم على ما على ما مورو ما 2014.

Allester & Accepted - Cobined & MPK Jon Sun Spiral Star.

A.L.L. B. R. Ed., Certificate Rante has Advised a High Court Peshawar Federal Sparies Court. BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 818 / 2016

APPLICATION FOR SHORT ADJOURNMENT.

Respectfully submitted:

- 1. That the above mentioned appeals are fixed for hearing for tomorrow on 27-10-2016.
- 2. That in the above mentioned appeals the undersigned Syed Younas Jan, Advocate is a counsel for the appellants.
- That the undersigned/Advocate (counsel for the appellants) will busy in an urgent peace of work in Islamabad due to which he will unable to attend this Hon'ble Tribunal in the Above mentioned appeals on the date fixed i.e. 27-10-2016.

It is, therefore, prayed that the above mentioned appeals may kindly be adjourned to some other date as convenient to this Hon'ble Tribunal.

PESHAWAR

26-10-2016

(Syed Younas Jan)
Advocate, Peshawar
Counsel for the appellants
Cell No. 0301-8826010

Service Appeal No: 818/2016

Syed Fazal Abbas Zaidi, DPE GHSS Kachi Paind Khan District D I Khan... Appellant.

VERSUS

Secretary E&SE Department, Khyber Pakhtunkhwa & others.Respondents

JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-5.

Respectfully Sheweth:-

The Respondents submit as under:-

PRELIMINARY OBJECTIONS.

- 1 That the Appellant has got no cause of action locus / standi.
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal.
- 4 That the instant service appeal is based on mala fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That this Honorable Tribunal has got no jurisdiction to adjudicate upon the present appeal.
- 7 That the Appellant has been treated as per law, rules & policy.
- 8 That the appeal is not maintainable in its present form.
- 9 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 10 That the instant Service Appeal is barred by law.

been

- 11 That the Appellant has not/awarded BPS-17 (Personal) & was promoted from PET to the DPE Post vide Notification dated 30/8/2000, which has not been challenged by the appellant.
- 12 That as per Finance Department Notification dated 03/8/1993, the appellant is not entitled for the grant of back benefits against the said Post.
- 13 That as per Govt: of Khyber Pakhtunkhwa, Pay Revised Rules, 1978, BPS-17 (Personal) was awarded to those DPEs working in BPS-16 along with Master Degree in the relevant subject.

ON FACTS

1 That Para-1, needs no comments being pertains to the service record of the appellant.

- That Para-2 is incorrect. The appellant has been promoted against the DPE Post from PET vide Notification dated 30/8/2000, in his own pay & scale with immediate effect & later on he has been promoted against the said Post on regular basis vide Notification dated 18/2/2003 in BPS-16(Regular). (Copies of the same are Annexures-A&B).
- 3 That Para-3, is correct. However the appellant did not challenged any of the promotion order for anti dation.
- That Para-4 is incorrect & denied on the grounds that the appellant has acquired his M. Sc Degree in HPE from Gomal University D I Khan on 15/3/1992 & was adjusted against the DPE Post from PET vide Notification dated 30/8/2000 on the basis of his qualification of SDPE with immediate effect. Upon the approval of the DPC Meeting held on 18/2/2003, the appellant was promoted to the DPE Post in BPS-16 on Regular basis with immediate effect. The appellant was further promoted against the DPE in BPS-17 (Regular) Post vide Notification dated 19/5/2009 with immediate effect. It is further submitted that in view of the Pay Revised Rules, 1978 of the Provincial Govt:, BPS-17 was awarded those DPEs who were already working in BPS-16 having M. Sc Degree in the relevant subject. However, vide Notification dated 03/8/1993 amendments in the said rules were made by declaring junior DPEs in BPS-16 & Senior DPEs in BPS-17(Personal). Furthermore, the appellant has failed to challenged any of the orders mentioned in the foregoing Paras, nor any Departmental Appeal is available on record so the present appeal is liable to be dismissed on this score/on the following grounds inter alia:

GROUNDS

- A Incorrect & not admitted. The act of the Respondent Department in view of the above made submissions in the foregoing Paras of the present reply is within legal sphere & is liable to be maintained.
- B Incorrect & not admitted. The statement f the appellant is against the law, rules & circumstance of the case. Hence deserves to be dismissed.
- Incorrect & not admitted. Detailed reply of this ground has already been given in the foregoing Paras. Hence needs no further comments.
- D Incorrect & not admitted. The Respondents have acted as per law, rules & policy in the instant case in terms of the above mentioned Notifications, hence deserves to be maintained in the interest of justice.
- Incorrect & not admitted. The statement f the appellant is against the law, rules & circumstance of the case. Hence deserves to be rejected.
- F Incorrect & denied on the grounds that the appellant has been found in-eligible in view of the above cited rulings. Hence this Para is also liable to be rejected.
- Incorrect & denied. Each & every case has its own parameter & the case of the appellant is totally different from those who have been treated as per law, rules & Policy in view of the above made rulings & Notifications.
- H Legal. However, the Respondents further seek leave of this Honorable Tribunal to submit additional grounds & case law /record at the time of arguments.

In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favour of the Respondent Department.

Dated 02/01/2017.

Director[']

E&SE Department Khyber Pakhtunkhwa, Peshawar.

(Respondent No: 2)

E&SE Department/Khyber

Pakhtunkhwa, Peshawar (Respondents No:1&5)

Secretary

Establishment Department

Khyber Pakhtunkhwa,

Peshawar.

(Respondent No:4)

Secretary

(Finance) Department Khyber
Pakhtunkhwa, Peshawar

(Respondent No: 3)

AFFIDAVIT

I Hameed Ur Rehman Asstt: Director (Litigation-II) E&SE Department do hereby solemnly affirm and declare On oath that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

Deponent

SUCTORATE OF SCHOOLS AND LITERACY N.W.F.P. PESHAWAR.

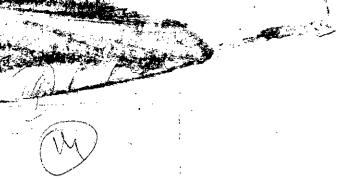
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Annex A" (13)

Consequent, pon the approval by the Departmental Selection Committee Schools with a NWFP in its meeting held on 26-12-2002. The following CT/PET/PTC, etc are hereby to the posts of DPE/ADC (Physical) II-16 on regular basis in the interest of public service to acceptate effect.

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[5]	Mr. Habibullah PET	- DPE	GEC (M) Dis	Against the post already occupied by here	
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54	Mr. Abdul Qadeer Khan PET	Dre	OHS5, Parova D.I Khan	Against the post afrendy occupied by his	. 1
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56	Mr. Amjad Khan PET	D! E	GHSS Sherpao Charsadda	Against the post already occupied by his.	
57	Mr. Nikhat ullah PET	DI E	GEC (80 Korka Habibultah FR Syntae	Against the post already occupied by 655	_:
1	Mr. Farid Zaman C.T.	DF	Phy:Edu:Collage Karak	Against the post afready occupied by the	
59	Mr. Ikramuliah PET	DPE	GHSS Sirker Haripur	Against the post atready occupied by ten-	
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61	Mr. Waris Khan P.T.C.	DPE	GHSS Munda Dir Lower	Against the just already occupied by a	_:
5	Mr. Muhammad Nawaz PET	DPE	GHSS Shabaz Ghari Mardan	Against the post afready occupied by the	_
63	Mr. ihsan Ullah PET	DPE	GHSS Fatehpur Swat	Against the post altendy necessed by his-	
54	Mr. Ashraf Ali Khan PET	DPE	L., SS Usterzai Kohat	regainst the best attendy occupied by his	
ő5	Mr. Zahoor Zaman P.T.C.	DPE	GHSS Kalam Swat	Against the post already occupied by hard	. '
66	Mr. Faten Sher PET	BYG.	OHSS Kabal Swat	Against the two already occupied by	
67	Mr. Muhammad Sharif PET	DPE	GHSS Kot Najibullah 11/1 ut	Against the wast already occupied of	
68	Mr. Said Khan PET	DPE	GHSS Lora Abbonabad	Apalitist the post already esceptive way	
69	Mr. Ghulam Hussain PET	DPE	GEC(M) Mardon	Against the post aroundy out opined by it con-	
70	Mr. Ghulam Nabi PET	DPE	GHSS Takb Bhai Mardan	Against the cost already occupied by tem-	
71	Mr. Muhammad Gul PET	DPE	GHSS No.2 D.I.Khan	Against the nost already occupies it, n	-
72	Mr. Racesullah P.T.C.	⊇PE_	GHSS Charbagh Swat	Against the poss stready occupied by host	
73	Mr. Nasir Khan PET	DPE	ADO (Phys) at EDO (S&L)Hangu	Against the post stready occupied by his.	
74	Mr. Zahoor Ahmad FET	OPE	GHSS Jallozai Nowshera	Against the post afready occupied by 1, in	٠.
75	Mr. Muhammad Haroon PET	DPE	GHSS Ismaila Swabi	Against the post already occupied by ano-	. .
76	Mr. Muhammad Igbal PET	DPE	GHSS Turbela T.Ship H/Pur	Against the post already occupied by him	_,
77	Mr. Farmanuliah PET	DPE	OUSS Pir Pai Nowshera	Against the post already occurried by a m	_

Note: -

- 1. Charge report should be submitted to all concerned.
- 2. No TA/DA etc: me allowed.

(HAFIZ BAHADAR KHAN) Director Schools & Literacy NWFP Peshawar

Endst No. 3542 - 3628 /A-14/Promo:/DPE B-P6. Dated Peshawar the 18/2 Copy of the above is forwarded for information & necessary action to the:

- Director of Education (FATA) NWFP Peshawar.
- 2. Director Bureau and Tencher Education NWFP Abbottabad.
- 3. Accountant General NWFP Peshawar.
- 4. Executive District Officers (Schools & Literacy) in NWFP
- 5. District/Agency Accounts Officers in NWFP
- 6. Principal GEC (M) concerned.
- 7. Principal Govt: College of Physical Education Karak.
- 8. Principal GHSS concerned.
- 9. PS to Minister for Education NWFP Peshawar.
- 10. PS to Secretary Schools & Literacy Department Gove of NWFP Peshawar.
- 11. DPE/ADO Physical concerned.
- 12. PA to Director Schools & Literacy NWFP Peshawar-

Deputy Director Establishment Directorate Schools & Literacy NWFP Peshawar

LEE W. P. Date of the Control of the

OFFICIOT THE DIRECTOR SECONDARY EDUCATION NWEP, PESHAWAR.

The following qualified SDPE Teachers/Physical Supervisors, serving in the Education Department in NWFP/FATA due for promotion on seniority Basis are heroby adjusted against the posts of D.P.E.s/A.D.E.O(Phy:) in their own pay and Scale are the exigency of service in the interest of public Service on the verms & conditions in vogue or the ones to be framed in future with immediate lifect.

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	Ciraj widdin PAT, CHS, Asala Swat.	GHSS, Khawaza Khela Swat : -do-
	Sould Wilah SET, SHS, Shelkh Uttar Tank.	GHSS, Darosh Chitral -do-
į	Ibrania-ud-Din PET, GUS, Janduri Karak.	GHSS, Lachi Kohat -do-
š*	anwar Sawad, PET, Wis, Fasal Shah Metta Khel Bann	GHSS, Bareela Hari Pur -do-
/ _t <u>3</u> 5	Bahador Mawas PET, Mis. Sufaid Dheri Peshawar.	GESS, No.2. Peshawar Cantt: -do-
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•	Fur D. L. Khan.	

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1	Page No.2.		
¥.	Abdul Mañeed Physical Supervisor	G.E.C. (M) Peshawar Vacant Pol	
-1	Khyber Agency.	GHSS, Nizam Pur Nowshera -do-	٠,٠
) . z .	CHS, Nurer Bannu.	ADEO(Phy:) O/O DEO(M/S) Mensehera -d	Û ~
-	GHS, Peras Mansehera. S.Bakht Shah PET.	GHSS, Zeida Swebl -de-	
	GHS, Mansebdar Swebi Herid Wlah Khan PET.	-GHSS, Muryali D.I.Khan -do-	
	GHS, Kotla Lodhian D.I.Khan	CHSS, Dakki Charsadda -do-	
29;	Nuharmad Israr PET, GHS, Alo Kili Mardan		
30 ₂	Shams-ur-Rehman PET, GHSS, Sher Pur Manshera	GHSS, Sher Par Handeland	•
51.	1	GESS, ROMEAL POSITIONAL	
32 ₁	Nameen Khan PET, GHS, Bannu.	Govt: Elementary College H/Pur Gdo-	
33,		GHSS, Urmar Payan Peshawar -do-	
34,		GHSS, Kot Long Marden -do-	•
35,	Reis Khan PET, GHS, Lendi Khan Khel Lakki Marwat.	GHSS, Kheshgai Rayan NSR -do-	
3 6,	Inayat Khan PET,	GESS, Umar-zai Charsaddadc-	
1 37 ₂	GHS, No. 1. Rojjar Chd: Samar Khen PET,	GHSS, Palai Malakand Agency '-do-	
38,	GHS, Kharghali Khyber Agency. Thtisham-ud-Din PET,	GMSS, Billi Tang Kohat -do-	
39)	GHS, Ghundi Kili Karak: Abdullah Shah FET,	-do-	
₩ 40,	GHS, Not. Tank Gul Bad Shah PET, GHSS, No.4, Pechawar City	GNSS, Hazar Khani Peshawar -do-	,
41,		GHSS, Somer Bagh Dir -do-	
42,	Rukh Nisz PET. GKS, Wanda Urangseb Lakki Marwat	GHSS, Khan Pur A-Abad -do-	
43,	Abdul Ghaffar PET, GHS, Lalozai Bannu.	GHSS, Lel Qila Dir -do-	一度
44,	Muntaz Khan PET,	GHSS, Dhodiel Mansehera -cc-	T.Z.
45,	GHS, Abdul Lakki Marwat. Muhammad Safdar PET, GUSS, Karak.	GHSS, Doaha Kohat -do-	就
46,	Safdar Jan PET, G.T.H.S Pashawer City.	GHSS, No.1. Peshawar City -do-	
47.	Fazal-e-Rabi PIT GEC(H) Swabi	G.E.C.(M) Swabi -do-	
48	Khaici Rehman Ic/DPE GEC(M) Mirali NWA	GEC(M) Mirali NWA -do-	. بدو
49.	Muhammad İsmail Physical Superviso	r GHSS, Utmonzai Chd: -de-	
50	Muhmend Agency. Boshan Akbar PET;	GHSS, Gandaf Swabi -do-	-
51	GHS, Dagai Swebi	A.D.E.O(Phy:) O/O DEO(M/S) Charsed	da -dc
2	GHS, Saval Dher Hardan Lal Mar Jan PET,	GHSS, Shabqadar Fort Chd: -d	 0 ;
	GES, Shaidan Banda Karak.		Of

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[5 ₊	Kiawazalat Khan PET, GHS, Surgha SWK.	:GHSS:	Ziarat Talash Dir Vac	ent Post
a F	Ahmad Nawanz PRT, GHS, Shabaz Ahmad Khel Bannu,	GHSS,	Dorband Mansehera	-dó
-5,	Barbahisht Khan PET . GHS. No. 7. Buner. () ()	GHSS.	Nawagai Bunor	-cb-
₹5 _{\$}	S. Ibad Ur Rehman PET, STS. E Lakkari Muhmend Agency.	GHSS,	Och Dir	-do-
٠٧,	Kiramat Ullah PET, GHSS, T.Nasrati Karak.	GHSS,	Bogara Karak.	-go-
٠3,	Salar Khan PET, GHS, Gujrat Mardan	Guss,	Risal Pur NSR	-do-
. 37	Rashi Din PET GHS, Paloski Karak.	GHSS,	Warana Karak	-do-
	S.Fazel Abbas Zaidi PET, GHS, Kachi Pind Khan D.I.Khan	-GRES,	Khan Pur Dir	-do-
š.,	Falok Noz PET, SES, Dheri Saidan Bannu.	G.E.C	(Tahan) Malakand Agency	-do-
2,	Fazal Wahid PET, GHS, Chakdara Dir.	GHSS.	Bat Khola Molakand Agency	-do-
	Mushtan Kkan PET, GHS, Mandan Bannu.	GHSS,	Mathra Peshawar	-do-
•	Arbab Pawad Khalil PET . GHSS, Pir Pai NSR	GHSS,	Pir Pai NSR	-do-
5.	Habib Ollan PET, GHSS, No1. Bannu.	G.E.C.	(M) Dir	-gò-
5,	Mujoeb Ur Rehman PET, GHS, Ghundi Shamshaki Karak	•	Snakar Dara Kohat	-do-
: ,	Muhamma, Javed FET GRos, Rawan Sher M-Abad.	ADEO()	Phy:) O/O DEO (M/S) Abbotta	bad -do- normano to
53,	Johan Alem PET. BHS, Topi Buncr.	GHSS.	Mingora Swnt	-do-
59 ,	Abdul Queer Khan PFT.	-GHSS,	Brekki D.I.Khan	− ₫⊙−
- (\$} _# - (Charmi Khan PET, GMS, Khan Pur Mardan.	GHSS,	Hab Gani Dwabi	- 1 0-
	Amjad Khan PEP, GMS, Biarat Will Chd:	chas,	Sher Pmo Chd:	- <u>C</u>
Ξ,	Nekhat Ullah FET, le/DPE GEC(M) Kotka Habib Ullah FR Bannu.) Kotko Habib Vilah FR Bana	n• -qo-
* 7 * 1	Farid Zaman CT GES, Multani Rannu.	G.E.C	(M) Mathra Peshavar	~ 20−
	Muhammad Esman PET, GHSS, No.3. D.I.Khan	_ ches.	Darliban Kalan D.I.Khan	-do-
75,	Waris Khan PTG GPS, Sher Zemen Dolo Khel Lekki Me	•	Munda Dir	Goules Goulf.
· **	Muhammad Nawaz PET, SHS, Nawan Kili Swabi.	GHSS.	Shabaz Garhi Marden	
. ë	Thean Wilah MET, GHE, Bidara Swat.	GHSS,	Fatch Pur Swat	्र तुर्मु•−
$\mathbb{S}_{\mathbf{x}}$	Ashraf Ali PEC, GHS, Isquial Ebel Bannu.	giss,	Biroate A-Abad	do-
1.34	Cohoor Zaman PFO, GPS, Emal Whel Bannu.	GHSS,	Kalam Swat	
ω,	Tawab Ali Shah PET GHS, Mesa Khel Banochi Bannu.	GHSS,	Tarbela Town Ship Hari Pur	-do-
		_GESS,	Kabal Swat	-do-
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