


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No. 453/2024**

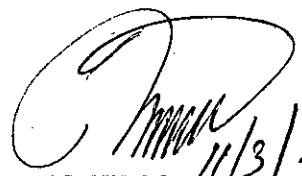
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27/03/2024	<p>The appeal of Mr. Muhammad Yaseen refiled today by registered post through Mr. Fazal Haq Kohistani Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on 24.04.2024. The counsel for the appellant has been informed telephonically.</p> <p>By the order of Chairman</p> <p> <b>REGISTRAR</b></p>

The appeal of Mr. Muhammad Yaseen received today i.e on 08.03.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ✓ 1. Copy of impugned promotion order wherein the junior colleagues of the appellant were promoted to the post of SST B-16 mentioned in the heading of the appeal is not attached with appeal be placed on it.
- ✓ 2. Sub-rule-4 of rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974 requires that every civil servant to whom the relief claim may affect shall also be taken as respondent.
- ✓ 3. Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent may also be submitted with the appeal.

No. 537 /S.T.

Dt. 11/3/2024.

  
11/3/24  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.


Fazal Hussain Advocate  
Adv. Manschna, Peshawar.

① Copy of impugned promotion order of Junior colleagues / Respondents 3, 4 p-no 19(A) and Annexure (B<sub>1</sub>)

(2) Three copies of Appeals - for Respondents -

may kindly be Submitted  
this Appeal.

25/3/24.

  
Fazal - Hussain  
Advocate  
(Manschna)

# THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

## PESHAWAR

### **Advocate Detail**

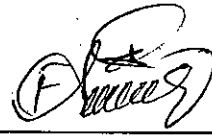
Full Name: **FAZAL-HAQ**  
Father's Name: **SHAR AFZAL**  
Date of Birth: **01/02/1988** CNIC# **13401-2177174-5**  
Permanent Address: **OFFICE, DISTRICT COURTS, MANSEHRA**  
Present Address: **As Above**  
Email: **Advfazalhaq@gmail.com** District **Mansehra**  
Mobile# **0346-2728625**  
License No. DC: **156199** Issue Date: **15.03.2017**  
License No. HC: **156199** Issue Date: **02.07.2020**  
License No. SC: **NIL** Issue Date: **NIL**

### **MENTION YOU PENDING CASES:**

<b>Case No.</b>	<b>Petitioner</b>	<b>Respondent</b>
Service Appeal	Sonia Bibi	Govt of KPK
Service Appeal	Shaheen Miskin	Govt of KPK
Service Appeal	Nelam Bibi	Govt of KPK
Service Appeal	Sadar Khan	Govt of KPK
Service Appeal	Fazal Kareem	Govt of KPK

Date: 26/2/2024

Signature: \_\_\_\_\_



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**BEFORE THE KHYBER PUKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 453 2024

Muhammad Yaseen...APPELLANT

**VERSUS**

Director Elementary and Secondary  
Education Peshawar etc


.....RESPONDENTS

**SERVICE APPEAL**


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Dated 26.02.2024

  
Muhammad Yaseen  
.....Appellant

Through:-

  
**FAZAL HAQ KOHISTANI**  
Advocate High Court

**BEFORE THE KHYBER PUKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 453 of 2024

Khyber Pakhtunkhwa  
Service Tribunal

Docket No. 11680

Dated 8/3/24

Muhammad Yaseen son of Jamdad,  
Khan resident of Subdivision, SEO  
Kohistan Upper .....APPELLANT

**VERSUS**

1. Director Elementary and Secondary Education Peshawar.
2. District Education Officer (Male) Kohistan Upper.....RESPONDENTS.

**APPEAL UNDER SECTION 4**  
**OF KHYBER PUKHTUNKHWA**  
**SERVICE TRIBUNAL ACT 1974,**  
**AGAINST THE IMPUGNED OFFICE**  
**ORDER BEARING NO. 4880-86**  
**DATED 18.09.2023 WHEREBY THE**  
**RESPONDENT NO.2 ILLEGALLY,**  
**UNLAWFULLY AND AGAINST THE**  
**RULES AND REGULATION AND**  
**UNDER THE UNDUE PRESSURE, AND**  
**BASED ON THE MALAFIDE,**  
**AGAINST THE APPELLANT,**  
**PROMOTED JUNIOR COLLEAGUES**  
**OF THE APPELLANT TO POST OF**  
**SST BPS-16, WHILE BY PASSING THE**  
**APPELLANT.**

Filed to-day

Registrar

**BEFORE THE KHYBER PUKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 453 of 2024

Muhammad Yaseen son of Jamdad  
Khan resident of Subdivision SEO  
Kohistan Upper .....APPELLANT

*C.T GPS Doga*

**VERSUS**

1. Director Elementary and Secondary Education Peshawar.
  2. District Education Officer (Male) Kohistan Upper
  3. Sher Khan son of Muhammad Hadees resident of Seo Tehsil Sub Division Seo District Kohistan.
  4. Muhammad Saleem son of Shah Mardan resident of Palas Tehsil Palas District Kolai Palas presently Upper Kohistan Dasu.
- .....RESPONDENTS.

**APPEAL UNDER SECTION 4  
OF KHYBER PUKHTUNKHWA  
SERVICE TRIBUNAL ACT 1974,  
AGAINST THE IMPUGNED OFFICE  
ORDER BEARING NO. 4880-86  
DATED 18.09.2023 WHEREBY THE  
RESPONDENT NO.2 ILLEGALLY,  
UNLAWFULLY AND AGAINST THE  
RULES AND REGULATION AND  
UNDER THE UNDUE PRESSURE, AND  
BASED ON THE MALAFIDE,  
AGAINST THE APPELLANT,  
PROMOTED JUNIOR COLLEAGUES  
OF THE APPELLANT TO POST OF  
SST BPS-16, WHILE BY PASSING THE  
APPELLANT.**

**PRAYER:-**

On the acceptance of the instant appeal, the impugned office order bearing No. 4880-86 dated 18.09.2023 be set-aside being illegal against the rules and regulations, against the law and justice as well as against the set principles of promotion and appellant be promoted to the post of BPS-16 SST or any other order or relief as this honourable Tribunal deems fit and proper may also be issued.

**Respectfully Sheweth:-**

**Facts:-**

1. That, the appellant was initially appointed in the education department as PST teacher BPS-12, dated 14.05.1992 and after words the appellant promoted from PST teacher PBS-12, to PSHT PBS-15 since then appellant is working in the education department.

*(Copy of the appointment order dated 14.05.1992 annexed as annexure "A")*

2. That, the appellant is working teaching in the education department from the last 28/29 years with the great Zeal and Zest and never negligent in the performance of the appellant.

3. That, the keeping in view the above situations, the appellant was senior most than the other colleagues of the appellant for the purpose of promotion and this fact also reflects from the impugned office order of the appellant as well as respondents.

*(Copy of impugned order bearing No. 4880-86 dated 18.09.2023 and order No. 4898-4903 dated 08.12.2023 are annexed as annexure "B & B-I").*

4. That, as per seniority list, the appellant is in first Number and the official respondents were duty bound to promote the appellant against the impugned post. But the official respondents while by passing the seniority list, promoted the other colleagues of the appellant.



*(Copy of the seniority list dated 07.09.2023 is annexed as annexure "C").*

5. That, the appellant being aggrieved from the impugned order bearing No. 4880-86 dated 18.09.2023, appellant preferred his appeal to the respondent No.1 but the same have been not decided till today after the lapse of more than 90 days.

*(Copy of departmental appeal dated 11.11.2023 and other testimonial documents are annexed as annexure "D & E").*

6. That, the appellant being aggrieved from the impugned order dated 18.09.2023 and by the conduct of respondents No.2 who Malafidely not decided the departmental appeal, seeks the gracious indulgence of this honourable Tribunal by way of instant service appeal inter alia on the following grounds.

-:GROUNDS:-

- a) That, the impugned officer order dated 18.09.2023 is wrong, illegal against the law and facts fanciful, perverse, against the relevant law, rules and regulations hence being not maintainable in the eye of law.
- b) That, it is in admitted position that the appellant is working in the education department from last 28-29 years with great Zeal and Zest and never remained negligent in performance of his duty.
- c) That, there is not even a single complainant against the appellant nor there is any red entry regarding the service career of the appellant rather the appellant has excellent service career.
- d) That, the respondents also maintainable seniority list regarding the promotion of the departments employees and as per the seniority list, the appellant being senior most were entitled for the promotion against the impugned posts but

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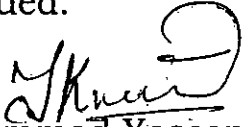
respondents have by passed the seniority list in as sheer malafide manner while promoting the junior colleagues of the appellant.

- e) That, it is an inalienable right of the appellant to be treated in accordance with the law, rules and regulations but such right of the appellant is infringed by the respondents in sheer a malafide manner.
- f) That, acts of the respondents against the natural justice and against the law, against the rules and regulation and policy on the subject.
- g) That, the respondents illegally and against the procedure have not maintainable the seniority list and thus acted against the settled principles that there should be a seniority list in department to be maintained by the head of the department for the purpose of the promotion.

## .....PRAYER.....

It is, therefore, most humbly prayed that on the acceptance of the instant appeal, the impugned office order bearing No. 4880-86 dated 18.09.2023 be set-aside being illegal against the rules and regulations, against the law and justice as well as against the set principles of promotion and appellant be promoted to the post of BPS-16 SST or any other order or relief as this honourable Tribunal deems fit and proper may also be issued.

Dated 26.02.2024

  
Muhammad Yaseen  
.....Appellant

Through:-

  
FAZAL HAQ KOHISTANI  
Advocate High Court,

**BEFORE THE KHYBER PUKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. \_\_\_\_\_ 2024

Muhammad Yaseen.....APPELLANT

**VERSUS**

Director Elementary and Secondary  
Education Peshawar etc

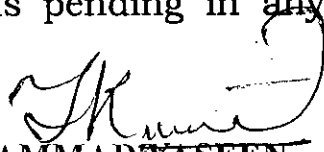
.....RESPONDENTS

**SERVICE APPEAL**

**AFFIDAVIT**

I, **Muhammad Yaseen son of  
Jamdad Khan resident of  
Subdivision SEO Kohistan Upper,  
Appellant**, do hereby solemnly  
affirm and declare on oath that the  
contents of foregoing service appeal  
are true and correct to the best of  
my knowledge and belief and  
nothing has been concealed therein.  
No such appeal is pending in any  
other court.

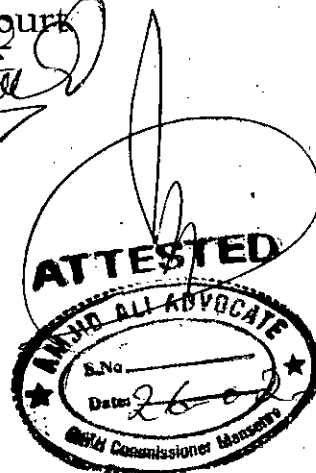
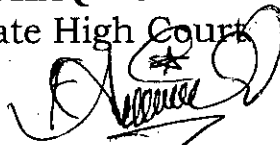
Dated 26.02.2024



MUHAMMAD YASEEN  
Deponent

Identify by!

**FAZAL HAQ KOHISTANI**  
Advocate High Court



**BEFORE THE KHYBER PUKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. \_\_\_\_\_ 2024

Muhammad Yaseen...APPELLANT

**VERSUS**

Director Elementary and Secondary  
Education Peshawar etc

.....RESPONDENTS

**SERVICE APPEAL**

**CORRECT ADDRESSES OF THE PARTIES**

**APPELLANT**

Muhammad Yaseen son of Jamdad  
Khan resident of Subdivision SEO  
Kohistan Upper

**RESPONDENTS**

1. Director Elementary and Secondary  
Education Peshawar.
2. District Education Officer (Male)  
Kohistan Upper
3. Sher Khan son of Muhammad  
Hadees resident of Seo Tehsil Sub  
Division Seo District Kohistan.
4. Muhammad Saleem son of Shah Mardan  
resident of Palas Tehsil Palas District Kolai  
Palas presently Upper Kohistan Dasu.

**Dated 26.02.2024**

Muhammad Yaseen  
.....Appellant

Through:-

**FAZAL HAQ KOHISTANI**  
Advocate High Court

REPORT OF THE DIRECTOR, DEPARTMENT OF AGRICULTURE, ON THE PROGRESS OF THE WORK DURING THE YEAR 1905

The following preliminary observations are hereby reported on the progress of the work during the year 1905. The work has been carried on in accordance with the plan laid down in the report of the Director for the year 1904. The progress has been satisfactory in many respects, and it is hoped that the results will be of great value to the Department.

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Annexure

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4. Gul Mohamud
5. Noor Ali
6. Saifur Rahman
7. Abdul Gaddus
8. Haidar-ur-Rahman
9. Abdul Hameed
10. Haidaruddin
11. Mohd Yusoff
12. Mohd Yusoff
13. Gul Mohd Yusoff
14. Huzefa Khan
15. Huzefa Khan
16. Saifur Rahman
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Name of Candidate

P/Name

Roll no

Appoint





48. Sadiq Inuana.	Sudhar.	Danna.	GPS Gayal.	
49. Babbar Jamil.	Saifur Rafook.	Jalkot.	GPS Kuzgahin.	
50. Darraj Khan.	Jumma Khan.	Soe.	GPS Hocho Bari.	
51. Hoorul Wahaj.	Alif Saif.	Jalkot.	GPS Bar gah.	
52. Afsar Khan.	Samandar Khan.	Jalkot.	GPS Kanad.	
53. Jumma Khan.	Jamroz Khan.	Danna.	GPS Mirrang.	
54. Saif Mohd Khan.	Qadun Khan.	Soe.	GPS Kanad.	
55. A.Jjoen.	Samandar.	Kafarkot.	GPS Othoor.	
56. Fazal Karim.	Chahair Malak.	Soe.	no do---	
57. Shor Khan.	Hadeen Khan.	Soe.	GPS Ehuwar.	
58. Akbar Azam.	Gul Zaf.	Jalkot.	M/S Haseental Eslam Danna.	
59. Al-Jalir Wakoel.	Abdul Jameel.	Soe.	GPS Dhori.	
60. Abdul Qadir.	Sikandar.	Danna.	M/S Dano Bala, K Jalkot.	H/C/Post
61. Fazlur Rahman.	Abdul Majid.	Jalkot.	GPS Mirrang.	V/P
62. Mohd Taj.	Jamroz.	Gayal.	GPS Parl.	
63. Nadim Dad.	Roshan Khan.	Soe.	GPS Razikar.	
64. Jahangir Khan.	Afsar Khan.	Jalkot.	GPS Koel.	
65. Jehanzeb.	Kacho Malak.	Soe.	GPS Lotor.	
66. Mohd Anwar, Khan.	Sikandar Khan.	Kodil.	M/S Farra.	
67. Jumma Khan.	Pardean.	Karoon.	M/S Uthoor.	
68. Abdul Manan.	Yar. Hadeen.	Chal.	" Ehtam Kot.	
69. Mohd Akbar.	Mal Jali.	Soe.	" Kogh.	
70. Muzamil.	Muzamil.	Soe.	" Danda.	7/P
71. Mohd Yamin.	Khan Pur.	Tayal.	" Kooz Jalo.	1/P
72. Abdul Baseer.	Hoshan Khan.	Soe.	" Chaj Tholi.	
73. Fariddon.	Bahadar Khan.	Soe.	" Dong Nala.	
74. Hoor Mohd Shah.	Hamid.	Soe.	" Musain Abad.	
75. Fazal Elahi.	Shah Mahmood.	Soe.	" Sikandar Bader.	
76. Shah Room Khan.	Mohd Din.	Soe.	" Darlo B/Jalkot.	
77. Ibrahim Khan.	Hazrat Khan.	Soe.	GPS Bar Sor.	V/P
78. K Mohd Jan.	Alif Roor.	Soe.	M/S Soridul.	
79. Rustam Khan.	Rehmat Khan.	Soe.	GPS Dhori Kangal.	
80. Mohd Anwar.	Imdad Khan.	Jalkot.	M/S Farigand.	1/P
81. Alim Shor.	Soram Khan.	Jalkot.	M/S Tajkut.	
82. Mohd Younas.	Mahd Khan.	Zodkar.	M/S Kooz Dala, Qan Sanyark	
83. Shor Gul Khan.	Mohd Saif.	Jalkot.	M/S Mirrang.	1/P
84. Muntaz Khan.	Faqir Shah.	Zodkar.	GPS Barlyar.	
85. Ali Haddor.	Mohd Rapoor.	Koozghin.	M/S Barha Dassar.	
86. Jan Mohd.	Mout.	Soe.	M/S Kooz Uch Gayal.	
87. Samandar Shah.	Mohd Linkoon.	Sargari.	" Gakoz.	1/P
88. Mohd Zada.	Mcho.	Soe.	" Shoh Nala.	
89. Mohd Amin.	Mir Subhan.	Soe.	" Khat.	
90. Muzamil.	Arqun.	Soe.	" Mohd Dal.	
91. Fazl Mohd.	Anjeel.	Soe.	GPS Ochar Bar.	
92. Ghazib Shah.	Mangray.	Soe.	GPS Tiyal.	
93. Ghulamdar Shah.	Sat Wal Shah.	Jalkot.	M/S Kayga.	
94. Ishaqul Haq.	Shah Zafreen.	Tayal.	GPS Saki.	
95. Hazrat Khan.	Majo.	Soe.	M/S Tiyal.	
96. Muzamilullah.	Musa Khan.	Soe.	M/S Kooz Kamin.	

Director of Education  
 Primary Education  
 District Office  
 Jalkot

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96. Muhsid Ahmad.	Saifullah.	Harban.	GPS Gabar.	Vacant
97. Abdur Rahim.	Fazlur Rahman.	Sec.	GPS Kool.	"
98. Mohd Nabl.	Mugharaf Khan.	Sec.	GPS Gabral.	"
99. Gais Malook.	Abdul Hanan.	Jullot.	RRx W/S Kullot.	"

**Notes:-**

This Order supersedes all the previous un-trained Teachers orders issued from this Office time to time w.e.f. 21-4-1992 up to 13-5-1992.

**CONDITIONS:**

1. Candidates who are Govt: Servants and their application have not been received through their departments and those who are residing studying in any Institute are not eligible for appointment.
2. Charge Report should be submitted to all concerned.
3. MP TA/DA is allowed.
4. Original Certificates of the Candidates may please be checked by the S.O. (Male) Kohistan before handing over the Charge, if the Certificate is found bogus Service order will be considered as cancelled.
5. Their Services are liable to be termination at any time with out assigning any reasons.
6. Age and Health Certificates from D.H.O Kohistan should be produced.
7. They should not be allowed to take over charge if their age is less than 10 years and above 30 years.

*Atab*  
 (ADIL-GATTAR KHAN)  
 DISTRICT EDUCATION OFFICER (M)  
 (PRIMARY) EDUCATION KOHISTAN.

Order NO. 698-889 Dated the Kohistan 19/5 1992.

Copy of the above is forwarded to:-

1. Director Primary Education RWFP Rayat Abul Poshawar.
2. S.D.E.O(M) Kohistan, with the remark that the Original Certifications may please be verified before handing over charge to them.
3. Candidates concerned.
4. Office Order file.

*Atab*  
 DISTRICT EDUCATION OFFICER (M)  
 (PRIMARY) EDUCATION KOHISTAN.

Attested  
*[Signature]*  
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Annexure  
"A"

**OFFICE OF THE DISTRICT EDUCATION OFFICER (M) PRIMARY  
EDUCATION KOHISTAN**

**IN VIEW OF DECISION TAKEN DATED 14.05.1992**

**Modified order for appointment**

That following unstrained candidates are hereby appointed on merit basis in BPS-7 (Rs1095/-) P.M fixed plus usual allowance as admissible under the rules in the interest of public service with immediate effect on the following terms and condition.

S.N o	Name of candidates	Father name	Resident	Name of school in which apptt,	Rs
1.	Ishanullah	Abdullah	Jijal	G.P.S Bela Rustam Khel	V.ptt
2.	Mohd Nawab	Raj wali	Do	Do maskhapa	Do
3.	Fazal Haq	Haji Suleman	Renolia	MS K K Khel	Do
4.	Member Khan	Miralon	Pattan	G.P.S Arakh	Do
5.	Fazaul Rauf	Haji Bilal	Shulgarn	M/S Doosa	Do
6.	Fazal Haq	Abdul Majid	Ronalla	M/S Kagaro	Do
7.	Mir Subhan	Juma Khan	Do	M/S Sahmoon Kayal	Do
8.	Umar Darar	Balay	Do	OPS Kuagobral	Do
9.	Yahya	Abdul Majid	Jidal	Do	Do
10.	Abdul Waris	Haji Munir	Pattan	M/S Neozabad	N/O/P
11.	Fasal Qadoos	Haji Jaffar	Bankar	M/S Kus Yeujal	N/O/P
12.	Karim Dad	Fazal Rehman	Pattan	M/S Boy akhel Rasaldar	N/O/P
13.	Nurul Haq	Haji Baray	Ranolla	M/S Maiden Kiyal	N/O/P
14.	Mir Alam	Mukadar	Kiyal	M/S Bakhar Kayal	N/O/P
15.	Gul Mohammad	Thouke	Pattan	M/S Kontar Kareen	N/O/P
16.	Mohd A'sar Khan	Munsaf Malik	Ranolls	M/S Mohjar Banda	N/O/P
17.	Qadir Shah	Monalceq	Dobair	M/S Qulkhan abad	N/O/P
18.	Ali Mohammad	Jaffar Khan	Jijal	M/S Chattargai Madrasa	N/O/P
19.	Kifayatullah	Mohd Ibrahim	Chakal	M/S Mondar Pattan	N/O/P
20.	Jahanzeb	Anwar Khan	Pattan	M/S Siarat Bogakhel	N/O/P
21.	Mohd Yaseen	Jamdad	Seo	GPS Doga	AVP
22.	Ashraf Ali	Umar Khan	Do	M/S Bakkaser Dubair	N/O/P
23.	Saizahab	Fazal Haq	Pattan	M/S Khulto pattan	N/O/P
24.	Balamgir	Gul	Do	M/S G.P.S Moj Gall	N/O/P
25.	Muhammad Mir	Said wasir	Do	M/S Namder Khel	Vacan t post
26.	Fazal ur Rahim	Dell Khan	Do	M/S Bered	Do
27.	Mohd Ameer	Muzamial	Seo	GPS Dogal	..

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27.	Mohd Ameer	Muzamial	Seo	GPS Dogal	..
28.	Noural Hadi	Muzamial	Seo	GPS Goyal	..
29.	Mohd Yousaf	Junaid Ali	Chochung	GPS Choclung	..
30.	Taj Muhammad	Musharruf Khan	Zod Kur	GPS Khyail	..
31.	Noor Ali	Muzamial	Seo	GPS Gil to Gayal	..
32.	Noor Muhammad	Niamatullah	Seo	GPS Jegal	..
33.	Abdul Quddous	Ahmed	Seo	GPS Lubber	..
34.	Habib ur Rehman	Bukhtiar	Seo	GPS Huz Gori Gubral	..
35.	Abdul Hunnan	Rahim dad	Barang	Do	..
36.	Abdul Ghulam	Haji Rustam	Seo	GPS lhwer	..
37.	Niamatullah	Sradrazo	Kundia	Do	..
38.	Mohd Faqir	Urdam khan	Dassu	GPS	..
39.	Gul Noor Khan	Taj Khan	Seo	Do	..
40.	Hazarat Khan	Abdul majeed	Soomer	GPS Baki	..
41.	Munir khan	Said Kabur	Seo	GPS Bariayar	..
42.	Tajur Rahim	Abdul Wanan	Soomer	GPS Chaki Hurban	..
43.	Bawar Khan	Daro Malak	Barlgo	GPS GPS Baki	..
44.	Hokum Dad	Saif	Seo	GPS Ghugo	..
45.	Bahadur Khan	Wat wali	Seo	M/S Gantar Tooti	..
46.	Fazal ur Rehman	Akbar Khan	Seo	GPS Tooti	..
47.	Mohd Zubair	Zull Ali	Zedkar	GPS Aghapoder	..
48.	Karimdad	Khan Gir	Zedkar	M/S Zebil	..
49.	Gul Mir Khan	Ali Hiader	Gayal	GPS Serto	..
50.	Sher Ghazi	Ali Hiader	Jalkot	GPS Sauk	..
51.	Abdur Rashid	Ali Hiader	Soral	GPS Barggadin	..
52.	Mohd Ayyaz	Abdul Mateen	Seo	GPS Serto	..
53.	Abdul Hajat	Ibrahim	Seo	M/S Gudar kurang	..
54.	Habiur Rehman	Abdul Hay	Seo	GPS Serto	..
55.	Fareed khan	Ayub	Soomil	GPS Ilil	..
56.	Sadar Khan	Bagoor	Zedkar	GPS Bargahin	..
57.	Baga	Abdul Ahad	Seo	GPS Ilil	..
58.	Abdul Qaddous	Abdul Aziz	Seo	GPS Sarrgurl	..
59.	Umer Yar	Ibrahim	Seo	GPS Jashol	..
60.	Anwar ul Haq	Chakair Malik	Seo	GPS Gabral	..
61.	Saiful Manzoor	Khani Zaman	Dadair	GPS Shuuk	..
62.	Mohd Siraj	Shan	Seo	GPS Jalkot	..
63.	Sartaj khan	Siraj	Seo	Berlgo (GPS)	..
64.	Sadber	Homal	Seo	Do	..
65.	Shamsul Haq	Mir Baz	Harban	GPS Ocher Sar	..

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66.	Ahmed Ali	Thambo	Seo	GPS Bagroo	
67.	Hijab Khan	Gulzar	Harban	GPS Dalu Gul	..
68.	Bakhmal sher	Kucho Malik	Seo	M/S Gue	..
69.	Gul Namair	Tali Zar	Seo	GPS Bagroo	..
70.	Nizamun Din	Toul Warn	Seo	GPS Bagroo	..
71.	Washal Wain	Ehan Vall	Baggu	GPS Kot Gali	..
72.	Fakhurd Din	Fakhur Islam	Seo	GPS Warian	..
73.	Mohd Imran	Sadaqat	Dassu	GPS Gayal	..
74.	Sabir Jamil	Salrul Malook	Jalkot	GPS Kuzzhin	..
75.	Duraj Khan	Jumma Khan	Seo	GPS Echo Bari	..
76.	Noorul Wahaj	Alif Said	Jalkot	GPS Der	..
77.	Afsar Khan	Jamroz Khan	Dassu	GPS Miarung	..
78.	Said Mohd Khan	Qaddus Khan	Seo	GPS Kanal	..
79.	Ajjoon	Sumundar	Kafarkot	GPS othoor	..
80.	Fazal Karim	Chakair Malak	Seo	Do	..
81.	Sher Khan	Haddes Khan	Seo	GPS Khuwar	H/C/PO ST
82.	Akbar Khan	Gul Zar	Jalkot	M/S Hurrutal Halem Dasu	V/P
83.	Abdul Wakeel	Abdul Jameel	Seo	GPS Bheri	..
84.	Abdul Qadir	Sikandar	Dasu	M/S Dano Jalkot	..
85.	Fazlur Rehman	Abdul wajid	Jalkot	GPS Wiarange	..
86.	Mohd Taj	Jamaraz	Giyal	GPS Parl	..
87.	Karim Dad	Roshan Khan	Seo	GPS Razikar	..
88.	Jahangir Khan	Afsar Khan	Jalkot	GPS Keel	..
89.	Jahanzeb	Kacho Malak	Seo	GPS Lootar	N/O/P
90.	Mohd Anwar Khan	Sikandar Khan	Kowil	M/S Porma	..
91.	Jumma Khan	Firdous	Gargari	M/S Uthoor	V/P
92.	Abdul Manan	Yar Maroon	Tayal	M/S Shetun kot	N/O/P
93.	Mohd Akbar	Raj wali	Seo	M/S Konhi	..
94.	Nuruleen	Muzamail	Seo	.. Darlu	V/P
95.	Mohd Yamin	Khan Pur	Tayal	.. Kooz Jalo	N/O/P
96.	Abdul Baseer	Roshan Khan	Seo	.. Chaj Thoti	..
97.	Faridoon	Bahadur khan	Seo	.. Dong Nala	..
98.	Noor Mohd Shah	Hamayoun	Seo	.. Hunan Abad	..
99.	Fazal Elahi	Shah Mehrood	Seo	.. Skandar dader	..
100.	Shah Room Khan	Mohd Din	Seo	.. Darlo B/Jalkot	..

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101.	Ibrahim Khan	Hazarat Khan	Seo	GPS Seo	V/P
102.	K Mohd Jan	Alif Noor	Seo	M/S Gorihal	..
103.	Rustam Khan	Rehmat Khan	Seo	M/S GPS Dhari Kangal	..
104.	Mohd Anwar	Haider Khan	Jalkot	M/S Tajkot	N/O/P
105.	Alam Sher	Soram Khan	Jalkot	M/S Tajkot	..
106.	Mohd Younas	Wasif Khan	Zodkar	M/S Kooz Badlu	..
107.	Nur Gul Khan	Mohd Ali	Jalkot	M/S warang	V/S
108.	Mumtaz Khan	Faqir Shah	Zudkar	GPS Tarlyar	..
109.	Ali Haider	Mohd Naseer	Kooz	M/S Barah jhar	N/O/P
110.	Jan Mohd	Niout	Seo	M/S Kooz Gch Gayal	..
111.	Sumandar Shah	Mohd Miskeen	Gargari	.. Gakoz	V/P
112.	Mohd Zahid	Muncho	Seo	.. Shorl Nala	..
113.	Mohd Amin	Mir Subhan	Seo	..	..
114.	Nurualin	Arqan	Seo	..	..
115.	Faiz Mohd	Injeel	Seo	GPS Ochar seo	..
116.	Gharib Shah	Wangray	Seo	GPS Tejwal	..
117.	Qalindar Shah	Sat Wali Shah	Jalkot	M/S Knyga	..
118.	Izharul Haq	Shah Zareen	Tayal	GPS Daki	..
119.	Hazarat Khan	Raja	Seo	M/S Tayal	..
120.	Waliullah	Hazarat khan	Seo	M/S koz komi	..
121.	Rashid Ahmad	Saifullah	Harbon	GPS Gaber	Vacant
122.	Abdur Rahim	Fazalur Rehman	Seo	GPS Kool	..
123.	Mohd Nabi	Musharaf Khan	Seo	GPS Gubral	..
124.	Saif Malook	Abdul Hunan	Jalkot	M/S Jalkot	..

**Note:-**

This order all the previous un-trained Teachers order from this office time to the w.e.f 21.04.1992 up to 13.05.1992

**Condition:**

1. Candidates who are Govt: Servants and their application have not been received through their departments and those who are studying in any institute are not illegible for appointment.
2. Charge Report should be submitted to all concerned.
3. No TA/DA is allowed
4. Original Certificates of the candidates may please be checked by the S.D.E.O (Male) Kohistan before handing

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26/2/2024

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- over the charge, if the certificate is began service order will be considered as cancelled.
5. Their service on are liable to be termination at any time without any reason.
  6. Age and health certificates from DHO Kohistan should be produced.
  7. They should not be allowed to take over charge if there is less than 18 years and above 30 years.

**ABDUL SATTAR KHAN**  
**DISTRICT EDUCATION OFFICER (M)**  
(Primary) Education Kohistan

Endst No. 698-889 dated the Kohistan 14.05.1992

**Copy of the above in forwarded to:**

1. Director primary Education NWFP Hayat Abad Peshawar.
2. S.D.E.O (M) Kohistan, with the remarks that the original certificates may please be verified before handing over charge to them.
3. Candidates concerned
4. Office order file.

**ABDUL SATTAR KHAN**  
**DISTRICT EDUCATION OFFICER (M)**  
(Primary) Education Kohistan

Attested  
E. S. Khan  
26/2/024

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# Annexure "B"



## Elementary & Secondary Education Khyber Pakhtunkhwa OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHISTAN UPPER

### OFFICE ORDER

Consequent upon the recommendation of the District Selection Committee (DSC) & this office order bearing No. 2797-2801 dated 31-05-2023, the following teachers are hereby promoted from PSHT BPS-15 to CT BPS-15 (23220-1980-83120) plus usual allowances as admissible under the existing policy of the Provincial Government on the terms and conditions given below and adjusted in the schools mentioned against their names, in the interest of public service with immediate effect.

S. No	Name	Father Name	D.O.B	School (current)	Adjusted at	Remarks
1	Fazal Karim	Chahar Khan	02/08/1972	GPS Dunga Gayal	GMS Gabriel	AVP
2	Shamuddin	ABDUL AZIZ	10/05/1972	GPS SAZEEN	GMS Sareen	AVP
3	Muhammad Yasin	Jamdad Khan	10/03/1978	GPS Doga	GMS Barigo	AVP
4	Dilbar Shah	Abdul Shakoor	1-2-1976	GPS Afreen Abad	GMS Ishpidar	AVP
5	Muhamma J Sali	Hazrat Khan	20/04/1970	GPS SHAIKAL HAZAR	GMS Dargah	AVP
6	Abdur Rahman	Muhammad Iqbal	10/01/1974	GPS Jamra Akbar Abad	GMS Karang	AVP
7	Muhammad Idris	Shah Zareen	01/05/1974	GPS Habib Shah Abad	GMS Bar Dahan	AVP
8	Raja Jamrood	Malik Pir Jais	01/06/1974	GPS Jalkot	GMS Jalkot	AVP

### TERMS & CONDITIONS

1. They will be on probation for a period of one year extendable for another one year.
2. They will be governed by rules and regulations as may be issued from time to time by the government.
3. Their services can be terminated at any time in case their performance is found unsatisfactory during probation period. In case of misconduct, they will be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. They will not be entitled to be recorded in their service book to the effect that if any overpayment is made to them in pursuance of this order, will be recovered and their promotion will be reversed.
6. Their inter-tenure liability on the lower post will remain intact.
7. No TA/DA is admissible.

District Education Officer (M)  
Kohistan Upper

Order No. **488086** / Promoted (Ext. Prom.) / DCO (M) KH Dated **18/09/2023**

1. The PA to Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. The Deputy Commissioner Kohistan Upper
3. The District Accounts Officer Kohistan Upper
4. The District Auditor Kohistan Upper
5. The Deputy District Education Officer Kohistan Upper
6. The District Education Officer Kohistan Upper
7. The District Education Officer Kohistan Upper

*[Signature]*  
District Education Officer (M)  
Kohistan Upper

*Attested*  
*[Signature]*  
26/2/2024





Promotion Order of SST of District Kohistan Upper (M) 2023

Directorate of Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

Annex (B2)

P-(19A)

**NOTIFICATION**

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No SO(B3A)1-18/E&SE/2012 dated 11.7.2012 and Finance Department Notification No.SO(FR)/FD/10-22(E)2010 dated 16.7.2012, the following SCT/CT, SDM/DM, SAT/IAT, STT/TT, S.Qari/Qari, PSHT/SPST/PST (Male) are promoted to SST (G), SST (Bio/Chem) and SST (Math/Phy) BPS-16 (Rs 28070-2260-95870), plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect. Their services are placed at the disposal of District Education Officer (M) concerned for further adjustment.

**SST (General)**

❖ PROMOTION OF SCT/CT TO SST (GENERAL) BPS-16 ON REGULAR BASIS

S.No	Name	Date of Birth	School
1.	Saddiq Hussain	05-12-1970	GHS Shatal
2.	Mushtaq Ahmad	09-04-1983	GHS Seo.
3.	Muhammad Siraj ud Din	13-12-1968	GHS Harban
4.	Muhammad Faqeer	01-06-1968	GHS Teyal

❖ PROMOTION OF PSHT/SPST/PST TO SST (G) BPS/16 ON REGULAR BASIS

S.No	Name	Date of Birth	School
1.	Muhammad Saleem	10-01-1973	GPS Mothal
2.	Sher Khan	20-08-1971	GPS Chechar

**Terms and Conditions:-**

1. They will be on probation for the period as specified in Rules (15) substituted vide - No.SO (Policies)/E&AD/1-3/2017 Dated 07-12-2017 in Appointment, Promotion and Transfer Rules, 1989 (for Promotees Only).
2. They will be governed by such rules and regulations as may be issued from time to time by the government.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Se- Seniority on lower post will remain intact as per Rules (17)(4) of Appointment, Promotion and Transfer Rules, 1989.
6. No TADA is allowed for joining the duty.
7. They will give an under taking to be recorded in their service books to the effect that if any over payment is made to them in the light of this order, will be recovered and if wrongly promoted, will be reversed.
8. Before handing over charge, their documents may be checked. If they have not the required relevant qualification as per rules, they may not be handed over the charge of the post.

(Dr. Iqbal Khan)  
Director

Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

Dated Peshawar the 08 / 12 / 2023

No 4898-4903 / File/Promotion to SST/2023

Copy forwarded for information and necessary action to the:-

1. District Education Officer (M) Kohistan Upper.
2. District Accounts Officer Kohistan Upper.
3. PA to Director E&SE Khyber Pakhtunkhwa, Peshawar.
4. Officials Concerned.
5. M/File

Assistant Director (Estab-M-1)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

P = 20

Amir Khan B.

Elementary & Secondary Education Khyber PakhtunkhwaOFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)  
KHOHISTAN UPPEROFFICE ORDER

Consequent upon the recommendation of the District Selection Committee (DSC) and this office order bearing No. 2797-2801 dated 31.05.2023, the following teacher are hereby promoted from PST BPS 15 to CT BPS-15 (23920-1980-83320) plus usual allowances as admissible under the existing policy of the Provincial Government on the terms and condition given below and adjusted to the schools mentioned against their names to the interest of public service with immediate effect PSHT to CT-BPS-15.

S. No	Name	Father Name	D.O.B.	School (current)	Adjusted at	Remarks
1	Fazal Kareem	Chakair Malik	09.08.1977	GPS Doga Gayal	GMS Gabriel	AVP
2	Shamusddin	Abdul Aziz	16.09.1977	GPS Sazeem	GHS Sazeem	AVP
3	Muhammad Yasin	Jemdad Khan	10.01.1978	GPS Doga	GMS Bargo	AVP
4	Dildar Shah	Abdul Shaheer	01.02.1976	GPS Afreen Abad	GMS Ishpidar	AVP
5	Muhammad Sabir	Nawaz Khan	10.04.1970	GPS Shatial	GMS Dogah	AVP
6	Abdur Rehman	Muhammad	10.01.1974	GPS Jamra Akbarabad	GMS Karang	AVP
7	Muhammad idress	Shah Zama	01.05.1974	GPS Habid Shah Abad	GMS Bar Gaheen	AVP
8	Haj		04.06.1974	GPS Jalkot	GHS Jalkot	AVP

TERMS AND CONDITIONS:

1. They will be on probations period of one year extendable for another one year.
2. The will be extend by one year probations as may be issued from time to time by the government
3. Their service can be terminated at any time in case their performance is found unsatisfactory during probation period. In case of misconduct they will be proceeded under the rules farmed from time to time.
4. Charge report should be submitted to all concerned.
5. They will .... To the record d in their service book to the effect that if any overpayment made to the ..... This order will be recovered and their probation will be revised.
6. Their latest
7. No TA/DA is admissible.

**District Education Officer (M)**  
**Kohistan Upper.**

Endst No.4880-86 DEO (M) KH Dated 18.09.2023

1. The PA to director Elementary and secondary education Khyber Pakhtunkhwa Peshawar.
2. The Deputy Commissioner Kohistan Upper.
3. The District Account officer Kohistan Upper.
4. The District

Att-extended  
26/2/2024

**District Education Officer (M)**  
**Kohistan Upper.**

# Annexure "C"

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(21)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHISTAN UPPER  
FINAL SENIORITY LIST OF PSHTS KOHISTAN UPPER AS STAND ON 07 07 2013

Sl. No.	Name of Teacher	Roll No.	Academic Qualification	Professional Qualification	Designation	IPS	Date of Joining	Grade	Date of Entry into Govt. Service	Final App. No.	Final App. Date
1	MUHAMMAD WAHAB	333512	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
2	MUHAMMAD WAHAB	333513	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
3	MUHAMMAD WAHAB	333514	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
4	MUHAMMAD WAHAB	333515	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
5	MUHAMMAD WAHAB	333516	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
6	MUHAMMAD WAHAB	333517	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
7	MUHAMMAD WAHAB	333518	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
8	MUHAMMAD WAHAB	333519	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
9	MUHAMMAD WAHAB	333520	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
10	MUHAMMAD WAHAB	333521	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
11	MUHAMMAD WAHAB	333522	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
12	MUHAMMAD WAHAB	333523	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
13	MUHAMMAD WAHAB	333524	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
14	MUHAMMAD WAHAB	333525	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
15	MUHAMMAD WAHAB	333526	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
16	MUHAMMAD WAHAB	333527	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
17	MUHAMMAD WAHAB	333528	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
18	MUHAMMAD WAHAB	333529	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
19	MUHAMMAD WAHAB	333530	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
20	MUHAMMAD WAHAB	333531	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
21	MUHAMMAD WAHAB	333532	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
22	MUHAMMAD WAHAB	333533	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
23	MUHAMMAD WAHAB	333534	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
24	MUHAMMAD WAHAB	333535	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
25	MUHAMMAD WAHAB	333536	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
26	MUHAMMAD WAHAB	333537	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
27	MUHAMMAD WAHAB	333538	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
28	MUHAMMAD WAHAB	333539	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974
29	MUHAMMAD WAHAB	333540	FA	PTC	PS-1	15	15/08/1974	15	15/08/1974	15/08/1974	15/08/1974

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*Attested*  
*(F. No. 5)*  
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*P. = 22*

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**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHISTAN**

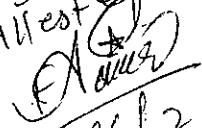
**FINAL SENIORITY LIST CT PSHTs KOHISTAN UPPER AS STTD ON 07.09.2023**

S	P. No	Name of Teacher	Father Name	Academic Qualification	Professional Qualification	Designation	GPS	Date of Birth	Domicile	Date of entry into Govt Service	Date of App: as Trained/Regular PST Teacher	Place of posting	Remarks
1.	333514	MURSALEEN	MUZAMMIL	FA	PTC,CT	PSHT	15	02.01.1972	Kohistan Upper	16.05.1992	16.05.1992	GPS Bargaheen	Not Illegible
2.	333601	JEHANGIR KHAN	AIAB KHAN	FA	PTC,CT	PSHT	15	01.03.1965	Kohistan Upper	05.12.1993	12.05.1993	GPS Doga Gyal	Not Illegible
3.	333662	MUHAMMAD AZAM	HAJI BHADER	FA	PTC,CT	PSHT	15	02.01.1974	Kohistan Upper	16.09.1993	16.05.1993	GPS Gabriel	Not Illegible
4.	333523	RAHMAT GHAZI	AKRAM KHAN	FA	PTC	PSHT	15	15.02.1976	Kohistan Upper	01.01.1995	01.01.1995	GPS Dogasazu	Not Illegible
5.	333422	ALAM SHER	SUROM KHAN	FA	PTC	PSHT	15	15.08.1967	Kohistan Upper	25.05.1995	25.06.1995	GPS Jalkot	Not Illegible
6.	333644	SAMANDAR SHAH	HAJI MISKEEN	FA	PTC	PSHT	15	01.01.1969	Kohistan Upper	25.05.1995	25.05.1995	GPS Afreen abadi	Not Illegible
7.	334441	MOHAMMAD QADIM	ABDUL QAHI	FA	PTC	PSHT	15	12.03.1972	Kohistan Upper	25.05.1995	25.05.1995	GPS Rango	Not Illegible
8.	335705	FAZAL KARIM	CHAKAR MALIK	BA	PTC,CT	PSHT	15	02.08.1972	Kohistan Upper	25.05.1995	25.05.1999	GPS Dongo Gial	Illegible for promotion
9.	331542	FAZAL RAHEEM	MUNWAR SHAH	FA	PTC,CT	PSHT	15	01.05.1972	Kohistan Upper	19.12.1995	19.12.1995	GPS Baghseri	Not Illegible
10.	335739	MUHAMMAD WALI	MASK	FA	PTC	PSHT	15	01.04.1973	Kohistan Upper	19.12.1995	19.12.1995	GPS Afreenabad	Not Illegible
11.	335759	DOST MUHAMMAD	DUSHAM KHAN	FA	PTC	PSHT	15	05.12.1994	Kohistan Upper	19.12.1995	19.12.1995	GPS Mshadam	Not Illegible
12.	333950	MIR ALI	SADBAR	FA	PTC	PSHT	15	15.11.1975	Kohistan Upper	02.03.1996	02.03.1996	GPS Karango	Not Illegible
13.	334894	MUHAMMAD AYAZ	ABDUL MATEEN	FA	PTC	PSHT	15	05.02.1972	Kohistan Upper	15.05.1992	30.08.1995	GPS Ghir	Not Illegible
14.	333848	MUHAMMAD SAFI	DARIL KHAN	FA	PTC	PSHT	15	01.05.1975	Kohistan Upper	01.10.1996	01.10.1996	GPS Komala	Not Illegible
15.	335599	SHAMSUDIN	ABDUL AZIZ	BA	B.ED, PTC	PSHT	15	16.06.1972	Kohistan Upper	02.03.1996	22.12.1996	GPS Sazcen	Not Illegible

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16.	333739	MUHAMMAD UZAIR	KHASTULLAH	BA	PTC	PSHT	15	01.03.1972	Kohistan Upper	02.01.1997	08.02.1997	GPS Doga	Not Illegible
17.	335037	SAIRAJUDEEN	MALIK YASEEN	BA	PTC	PSHT	15	01.03.1971	Kohistan Upper	01.02.1996	13.05.1997	GPS Gabar	Not Illegible
18.	331527	SHAH MUHI YASEEN	FAQEER JAN	BA	PTC	PSHT	15	20.08.1978	Kohistan Upper	18.12.1995	13.05.1997	GPS Kuz Kumala	Not Illegible
19.	335406	MIR ALAM	TOILA	BA	PTC,CT	PSHT	15	04.05.1975	Kohistan Upper	09.01.1996	13.05.1997	GPS Saig	Not Illegible
20.	331530	SHAMUS REHMAN	QALASH MIR	BA	PTC	PSHT	15	02.05.1975	Kohistan Upper	19.12.1995	16.05.1997	GPS Lubbi	Not Illegible
21.	333300	ABDUR REHMAN	ABDUL SAMAD	BA	PTC	PSHT	15	05.02.1970	Kohistan Upper	27.16.1997	35608	GPS Seo	Not Illegible
22.	335400	MUHAMMAD YASEEN	AMDAD KHAN	BA	CT.BED	PSHT	15	10.03.1978	Kohistan Upper	27.06.1997	27.06.1997	GPS Doga	Illegible for promotion
23.	335734	SHUKAT KHAN	ALAM GEER	BA	CT	PSHT	15	07.05.1976	Kohistan Upper	28.06.1997	28.06.1997	GPS Banjo	Not Illegible
→ 24.	333404	MUHAMMAD SALEEM	SHAH MARDAN	MA	MED	PSHT	15	10.01.1973	Kohistan Upper	30.06.1997	30.06.1997	GPS Sarzo	Not Illegible
25.	334476	RASHEED AHMAD	MOLANA ABDUR RAHEEM	BA	PTC	PSHT	15	01.05.1975	Kohistan Upper	30.06.1997	30.06.1997	GPS Metha	Not Illegible
26.	333424	MUHAMMAD ALI	NOOR NABI	BA	PTC	PSHT	15	01.01.1979	Kohistan Upper	30.06.1997	30.06.1997	GPS Ramai	Not Illegible
27.	333676	MUHAMMAD YOUSAF	JUMA SAID	BA	PTC	PSHT	15	05.04.1972	Kohistan Upper	02.08.1997	02.08.1997	GPS Deedal	Not Illegible
28.	333882	DIDAR SHAH	ABDUL SHAKOOR	BA	Bed,PTS, CT	PSHT	15	01.02.1976	Kohistan Upper	15.01.1998	15.01.1998	GPS Afreenahad	Not Illegible
29.	333342	ABDUR RAHEEM	AKBAR KHAN	BA	CT	PSHT	15	10.10.1971	Kohistan Upper	26.05.1993	27.02.1998	GPS Khutto pattan	Not Illegible

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26/2/2024

(24)

Annexure

بخدمت جناب ڈائریکٹر ایلیمنٹری اینڈ سیکنڈری ایجوکیشن خیبر پختونخواہ پشاور

محکمہ اپیل: بر آرڈر نمبری 86-4890-Endst No. مورخہ 18.09.2023

جاری کردہ DEO (میل) کوہستان

جناب عالی! محکمہ اپیل ذیل عرض ہے۔

۱۔ یہ کہ سائل مورخہ 10.03.1978 میں PST ٹیچر بھرتی ہوا اور اپنی ڈیوٹی بطریق

احسن سرانجام دیتا رہا۔ (نقل تعیناتی آرڈر لف ہے)۔

۲۔ یہ کہ سائل بعد ازاں PSHT BPS-15 میں پرموٹ ہو کر GPS دوگا میں

اپنی ڈیوٹی سرانجام دیتا رہا اور اسی دوران سائل کی پرموشن ہوئی تو محکمہ نے سائل

کو SST کے بجائے CT پر ہی پرموشن کا آرڈر جاری کیا حالانکہ سائل فائل

سٹیاریٹ لسٹ میں دوسرے نمبر پر ہے اور سائل کے جونیئرز کو CT کے بجائے

SST-BPS-16 پر پرموٹ کیا ہے۔ جو کہ سراسر غلط اور خلاف قانون ہے اور

سائل کے ساتھ نا انصافی ہے جس سے سائل نقصان عظیم کا خدشہ ہے۔

۳۔ یہ کہ سائل سٹیاریٹ میں دوسرے نمبر پر ہے اور سائل پہلے سے BPS-15 میں

PSHT ڈیوٹی سرانجام دے رہا ہے اور GPS دوگا میں اپنی ڈیوٹی سرانجام دے

رہا تھا۔ لیکن محکمہ نے غیر قانونی طور پر 16-BPS-SST کے بجائے

15-BPS-CT میں سائل کا آرڈر کیا اور سائل کے جونیئرز کو 16-BPS

SST پر پرموٹ کیا ہے حالانکہ سائل 16-BPS-SST پر پرموشن کا حقدار

تھا۔ لیکن بد قسمتی سے محکمہ نے سائل کی استدعا کو خارج کرتے ہوئے سائل کے

ساتھ سراسر نا انصافی کی ہے۔

۴۔ یہ کہ سائل فائل سٹیاریٹ لسٹ میں دوسرے نمبر پر آ رہا ہے اور سائل کو اس کے

قانونی حق سے DEO (میل) کوہستان نے محروم کیا ہے جس سے سائل کو ناقابل تلافی نقصان ہوا ہے۔

۵۔ یہ کہ سائل نے آج تک کوئی غیر حاضری یا اپنا ڈیوٹی میں کسی قسم کی کوتاہی نہیں کی ہے۔

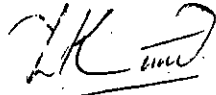
۶۔ یہ کہ محکمہ نے مورخہ 18.09.2023 کو سائل کو SST-BPS-16 کے بجائے CT-BPS-15 میں آرڈر کیا ہے، یہ کہ سائل پہلے سے BPS-15 میں تعینات تھا۔ محکمہ کا یہ فعل / افعال سراسر غلط، غیر قانونی ہے۔ جس کا سائل بالکل بھی پابند نہ ہے۔ (آرڈر مورخہ 18.09.2023 الف ہے)۔

لہذا استدعا ہے کہ! منظور کی محکمانہ اپیل سائل کو SST-BPS-16 میں پروموشن کا آرڈر جاری فرمایا جائے۔

المرقوم 11.11.2023

محمد یاسین خان ولد جمداد خان حال تعینات (GPS Dc ga)..... سائل

شناختی کارڈ نمبر 1-1503326-13401



All-steel  
(Dc ga)  
26/2/2024

626

Serial No

90492

# Alama Iqbal Open University Islamabad

CT

Annual  
"E"



Certified that *Mr/Ms* MOHAMMAD YASEEN KHAN  
 Son/Daughter of JAMDAD  
 Registration No 03-NKN-0134 Roll No S 628466  
 Semester Spring 2006 having met all the requirements  
 under the semester system is this day awarded the

## Certificate of Teaching

*He/She* has secured 62 % marks  
 and has been placed in B grade



Result declared on: March 20, 2007

1314

Controller of Examinations

Date of issue: May 19, 2009

CT

Note: This certificate is issued without alteration/erasure.  
The detail of courses is overleaf.

Attested  
[Signature]

26/2/024

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27

# Alimul Uloom Open University Islamabad



Serial No. 268166

Certified that Mr. / Ms. **MOHAMMAD YASEEN KHAN**

Son / Daughter of **JAMDAD**

Registration No: **03NKN0134**

Roll No: **BF635133**

having successfully completed the prescribed requirements  
in semester **SPRING 2016** is awarded the degree of

## Bachelor of Education (B.Ed)

He/She has secured **66** % marks and has been placed in **B** grade.

CONTROLLER OF EXAMINATIONS

*[Signature]*

VICE-CHANCELLOR



Result declared on: **January 17, 2017**

Date of Issue: **August 08, 2017**

*[Signature]*

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY

Attested  
*[Signature]*  
96/2/024

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# وکالت نامہ

بعدالت جناب سروس ٹریڈنگ کمپنی

مخبر نامہ بنام گورنمنٹ آف پاکستان

دعویٰ یا جرم سروس ٹریڈنگ کمپنی منجانب سرکاری/اعلانہ

باعث تحریر آئیکہ

اندریں مقدمہ عنوان میں اپنی طرف سے برائے پیروی و جواب دہی مقام۔

## حفل الیوم

کو بدیں شرط وکیل مقرر کیا ہے میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا اور بوقت پکار سے جانے پر وکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا اگر کسی پیشی پر مظہر حاضر نہ ہو اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی اور جگہ پکھری کے مقررہ اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ مقام پکھری کے کسی اور جگہ سماعت ہونے پر بروز پکھری کے اوقات کے آگے یا پیچھے ہونے پر مظہر کو کوئی نقصان پہنچے تو ذمہ دار یا اس کے واسطے کسی معاوضہ ادا کرنے، مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے کہ مجھے کل ساختہ پر داخستہ صاحب مثل کردہ ذات خود منظور قبول ہوگا اور صاحب موصوف کو عرض دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل نگرانی دائر کر کے منبر رو برو وصول کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپردتاشی درآئی نامہ و فیصلہ برخلاف کرنے و اقبال و غیرہ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا ڈگری قبل از فیصلہ کے لئے صاحب موصوف کو بشرط ادائیگی علیحدہ پیروی مختار نامہ کرنے کا مجاز ہوگا اور بصورت ضرورت اپیل یا اپیل کے واسطے کسی دوسرے وکیل یا ایئر سٹر کو بجائے اپنے مراد مقررہ کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو پوری فیس نارنخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا ہے کہ یہ سند ہے۔ مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

26/10/24

مخبر نامہ وکیل

JK

Attested  
26/10/24