

INDEX

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

EXECUTION NO _____

APPEAL NO	INSTITUTION	ORIGINAL INSTITUTION	DECISION	PAGES
1335/2019	25.03.24 15.11.24	19.09.2019	24.05.24	118

I NAMULLAH

vs GOVT OF K.P

Sr.No.	No of Pages	Documents	Page No
Part-A			
1	01 - 06	Judgment	06
2	07 - 21	Order Sheets	15
3	22 - 79	Memo of Appeal	58
4	80 - 80	Wakalatnama	01
5	81 - 113	Reply	33
6	114 - 114	Wakalatnama	01
7	115 - 118	Application for	04
8	-	Restoration	
9	-		
10	-		
11	-		
12	-		
Part-B			
1	-		
2	-		
3	-		

Total Pages in Part-A	0 118
Total Pages in Part-B	0

Muharij
26/6/24
Muharij Compilation

Incharge
26/6/24
Incharge Judicial Branch

1276/2007 was a question relating to execution of said judgment requiring determination by the Tribunal as an executing court under sub-section (1) of Section 47 CPC r/w Section 7(2)(d) of Khyber Pakhtunkhwa Service Tribunal Act, 1974?

4. Whether the present Execution Petitions No. 84/2020, titled "Muhammad Bashir Vs. Accountant General Khyber Pakhtunkhwa Peshawar and others", No. 85/2020 titled "Abdul Majid Vs. Accountant General Khyber Pakhtunkhwa, Peshawar and others" and No. 86/2020 titled "Wajid Ali Shah Vs. Accountant General Khyber Pakhtunkhwa Peshawar and others" are maintainable for execution of judgment dated 12.05.2009.

It is deemed appropriate to afford the parties with an opportunity of hearing before passing any order as to determination of the above questions. Case to come up on 08.09.2021 before S.B."



3. The questions as formulated vide order dated 05.08.2021 were further narrated merit down in view of the discussion made vide order dated 01.12.2021 and in order to avoid the repetition, the same is copied herein below:-

"Counsel for the petitioner, Mr. Muhammad Riaz Khan Paindakhel, Asstt. AG alongwith Sohail Ahmad Zaib, Litigation Officer, Amanatullah Qureshi, Deputy Secretary (Litigation), Finance department, Gul Moveed, Accounts Officer, Sabir Sultan, Senior Auditor for the respondents present."

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

BEFORE: **KALIM ARSHAD KHAN** ... **CHAIRMAN**
MUHAMMAD AKBAR KHAN ... **MEMBER (E)**

Service Appeal No. 1335/2019

Date of presentation of Appeal.....19.09.2019
Date of Hearing.....24.05.2024
Date of Decision.....24.05.2024

Inamullah S/o Taj Muhammad, ADEO Establishment Office of the DEO (M)
Peshawar.....(Appellant)

VERSUS

The Chief Secretary, Khyber Pakhtunkhwa, Peshawar and
others.....(Respondents)

NAILA JAN,
Advocate

--- For appellant.

MUHAMMAD JAN,
District Attorney

--- For respondents

JUDGMENT

MUHAMMAD AKBAR KHAN, MEMBER (E):- The instant service
appeal has been instituted under Section 4 of the Khyber Pakhtunkhwa
Service Tribunal, Act 1974 with the prayer copied as under;

*"That on acceptance of the instant, (I) the merit list
issued be respondent No. 4 may kindly be revised by
adding 2 additional marks of M.A Pak Studies and
Consequently (II) The appellant may kindly be placed at
serial No. 78 of the list and accordingly the impugned
seniority list may kindly be corrected by placing thee
appellant at S.No. 67 instead of S.No. 127 with all
consequential benefits."*

SCANNED
PESHAWAR

02. Brief facts of the case are that the appellant alongwith his others colleagues were appointed as ADO (BPS-16) on the recommendation of the Public Service Commission vide appointment Notification dated 05.05.2011; that a merit list was issued by the Public Service Commission wherein the appellant was shown at serial No. 144 by showing 61/38 marks. On the basis of merit list issued by Public Service Commission, a seniority list was issued by respondent No. 3 on 15.08.2018 wherein the appellant was shown at Serial No. 127; that the appellant was not awarded additional marks of M.A (Pak Studies), therefore, he approached to the respondents time and again for revising the merit list by awarding two additional marks of M.A (Pak Studies) and placed his name at proper place and correction of seniority list but in vain. The appellant filed departmental appeal on 15.05.2019 which was rejected vide order dated 26.08.2019, hence preferred the instant service appeal on 19.09.2019.

03. Notices were issued to the respondents, who submitted their comments, wherein they refuted the assertions raised by the appellant in his appeal. We have heard arguments of learned counsel for the appellant, learned District Attorney for official respondents and have gone through the record with their valuable assistance.

04. Learned counsel for the appellant contended the impugned merit list/seniority list and orders are against law, rules, principles of natural justice, void ab initio, hence liable to be set aside; that the appellant has mentioned M.A (Pushto) and M.A (Pak Studies) in his application to Public Service Commission and as per Khyber Pakhtunkhwa Public Service Commission

Notification dated 15.12.2003 Rule 29 (K) he was entitled for 04 additional marks but despite that he was awarded only 02 marks hence the appellant has been treated illegally; that due to illegal merit list, in the impugned seniority list, the name of the appellant has been wrongly fixed which is liable to be set aside and both the impugned merit list as well as the seniority list are liable to be corrected; that the respondent department violated Article 25 of the Constitution of Islamic Republic of Pakistan, 1973.

05. On the other hand, learned District Attorney contended that the appellant has secured 61/38 marks only, therefore, was placed on merit order No. 144. No illegality of violation of rules can be attributed to Public Service Commission. No fundamental rights of the appellant has been violated by the respondents rather the law dictates the treatment on merit, thus he was awarded marks that he could secure; that the appellant is not genuinely aggrieved person by any act of Khyber Pakhtunkhwa, Public Service Commission, may not be allowed to raise further ground against Khyber Pakhtunkhwa Public Service Commission.

06. Scrutiny of record reveals that the Khyber Pakhtunkhwa Public Service Commission advertised two hundred forty one (241) posts of Male Assistant District Officers (BPS-16) in the Elementary and Secondary Education Department vide Advertisement No. 05/2009. The appellant alongwith other candidates applied to the post of ADO (BS-16) and the appellant had successfully qualified for the said post. On the recommendation of Public Service Commission a Notification 05.05.2011 has been issued wherein the appellant was shown at serial No. 144 of the merit list. Thereafter respondent No. 4 issued final seniority list of ADEOs & ASDEOS (BPS-16)

on 15.08.2018 wherein the appellant was shown at serial No.127. The claim of the appellant is that the merit list of Public Service Commission has not been communicated to him and when he got the knowledge of the same he submitted application on 13.10.2016 for revising the merit list by awarding two additional Marks on M.A (Pak Studies) which was regretted being time barred vide order dated 21.11.2016. Similarly the appellant made another application dated 15.05.2019 which was replied vide letter dated 11.07.2019. The stance of the respondents is that, at the time of submission of application form, the appellant has only mentioned/claimed M.A (Pushto) and M.Ed degree being higher qualification for which total three (03) marks have been given, two (02) marks for M.A Pashto and one (01) mark for ME.d on account of additional/higher qualification and no other degree has been claimed. As per the law prevailing at the relevant time the request of the appellant was entertainable in specified period only. Respondents in their reply annexed Notification of the Khyber Pakhtunkhwa Public Service Commission repealed Regulation 2003. Regulation 37(13) of the said Notification is reproduced below.

(i) Answer books of candidates will be retained in the office of KP PSC for one year after recommendations against the post are issued and thereafter these will be destroyed. Similarly, application forms/copies of documents of non-selected candidates shall also be destroyed after one year of the issuance of recommendations. Any query relating to their answer books or application forms should be made by the candidates within the specified period, thereafter, no request in this regard shall be entertained. However, answer books or applications forms/copies of documents of

candidates wherein a query or an enquiry or a court case is pending shall be kept on record till final disposal of the query/enquiry/court case.

07. Through this appeal the appellant seeks correction in the merit list prepared and finalized by the Khyber Pakhtunkhwa Public Service Commission on the basis of which the department had prepared the seniority list. The Tribunal cannot direct the Public Service Commission to make any changes in the merit list as that could be out of the scope of jurisdiction of the Tribunal, therefore, this appeal is returned. Costs shall follow the event. Consign.

08. *Pronounced in open court at Peshawar and given under our hands and seal of the Tribunal on this 24th day of May, 2024.*



(KALIM ARSHAD KHAN)
CHAIRMAN



(MUHAMMAD AKBAR KHAN)
MEMBER (E)

(6)

ORDER

24.05.2024

1. Learned counsel for the appellant present. Mr. Muhammad Jan, learned District Attorney for the respondents present. Arguments heard and record perused.

2. Vide our detailed judgment of today separately placed on file, the Tribunal cannot direct the Public Service Commission to make any changes in the merit list as that could be out of the scope of jurisdiction of the Tribunal, therefore, this appeal is returned. Costs shall follow the event. Consign.

3. *Pronounced in open court at Peshawar and given under our hands and seal of the Tribunal on this 24th day of May, 2024.*



(KALIM ARSHAD KHAN)
CHAIRMAN




(MUHAMMAD AKBAR/KHAN)
MEMBER (E)


30th April, 2024

1. Appellant in person present. Mr. Muhammad Jan, District Attorney for official respondents present.

2. Appellant seeks adjournment as senior counsel was busy in Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 22.05.2024 before the D.B. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar


(Muhammad Akbar Khan)
~~(Farooq Paul)~~
Member (Executive)



(Kalim Arshad Khan)
Chairman


Naeem Amin

22nd May, 2024

1. Appellant in person present. Mr. Umair Azam, Additional Advocate General for the respondents present.

2. Former requested for adjournment on the ground that his counsel is not available today. Adjourned but as a last chance. To come up for arguments on 24.05.2024 before D.B. P.P given to the parties.


(Muhammad Akbar Khan)
Member(E)



(Kalim Arshad Khan)
Chairman


Adnan Shah, P.A

28.03.2024 1. Learned counsel for the appellant present and Mr. Muhammad Jan, District Attorney for the respondent present.

2. Instant application is for restoration of appeal which was dismissed in default on 24.10.2023 while this application has been moved on 25.03.2024. Learned Deputy District Attorney raised no objection on acceptance of the instant application seeking restoration of main appeal. Considering contention of learned counsel for the applicant and in the interest of justice, instant service appeal is restored on payment of cost Rs. 5000/ to its original number. To come up for arguments on 30.04.2024 before D.B. P.P given to the parties.

3. *Pronounced in open Court at Peshawar and given under our hands and seal of the Tribunal on this 28th day of March, 2024.*


(Farceha Paul)
Member (E)


(Rashida Bano)
Member (J)

GC JUDGE
K. O. S. T.
Peshawar

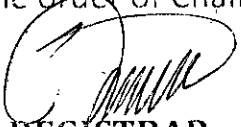
9

Form-A

FORM OF ORDER SHEET

Court of _____

Restoration Application No. 262/2024

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	25.03.2024	<p>The application for restoration of Service Appeal No. 1335/2019 submitted today by Niala Jan Advocate. It is fixed for hearing before Division Bench at Peshawar on <u>28-03-24</u>. Original file be requisitioned. Parcha Peshi given to counsel for the applicant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

**SCANNED
KPST
Peshawar**

10


ORDER
24.10.2023


Nemo for the appellant. Mr. Muhammad Jan, District Attorney for the respondents present.

The appeal in hand was called on for hearing after various intervals, however nobody put appearance on behalf of the appellant till rising of the court, therefore, the appeal in hand stand dismissed in default. Parties are left to bear their own costs. File be consigned to the record room.

SCANNED!
KPST
Peshawar

ANNOUNCED
24.10.2023


(Muhammad Akbar Khan)
Member (Executive)


(Salah-ud-Din)
Member (Judicial)

26.04.2023

Appellant present through counsel.

Fazal Shah Mohmand, learned Additional Advocate General for respondents present.

Learned Member Executive (Mr. Muhammad Akbar Khan) is on leave, therefore, case is adjourned. To come up for arguments on 27.06.2023 before D.B. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar

Mutazem Shah



(Rozina Rehman)
Member (J)

27.06.2023

1. Clerk of learned counsel for the appellant present. Mr. Asad Ali Khan, learned Assistant Advocate General for the respondents present.


2. Former requested for adjournment due to engagement of learned counsel for the appellant before the Hon'ble Peshawar High Court, Peshawar. Granted. To come up for arguments on 24.10.2023 before the D.B. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar



(Fareeha Paul)
Member (E)

Kaleemullah



(Rashida Bano)
Member (J)

12

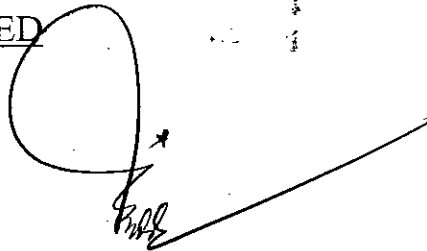
ORDER
04.01.2023

Learned counsel for the petitioner present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present. Arguments on restoration application heard and record perused.

The application in hand has been filed by the petitioner for restoration of Service Appeal bearing No. 1335/2019 titled "Inamullah Versus The Chief Secretary Khyber Pakhtunkhwa Peshawar and 71 others", which was dismissed in default on 17.10.2022. It has been alleged in the restoration application that learned counsel for the petitioner was out of station, while the petitioner was unable to appear due to illness on the relevant date. The restoration application is supported by duly sworn affidavit. Moreover, law also favours adjudication by avoiding technicalities, therefore, restoration application in hand is allowed and service appeal bearing No. 1335/2019 titled "Inamullah Versus The Chief Secretary Khyber Pakhtunkhwa Peshawar and 71 others" is restored on its original number. To come up for arguments on 26.04.2023 before the D.B.

SCANNED
Peshawar

ANNOUNCED
04.01.2023



(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

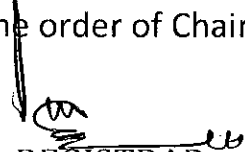
13

Form-A
FORM OF ORDER SHEET

SCANNED
BT
Peshawar

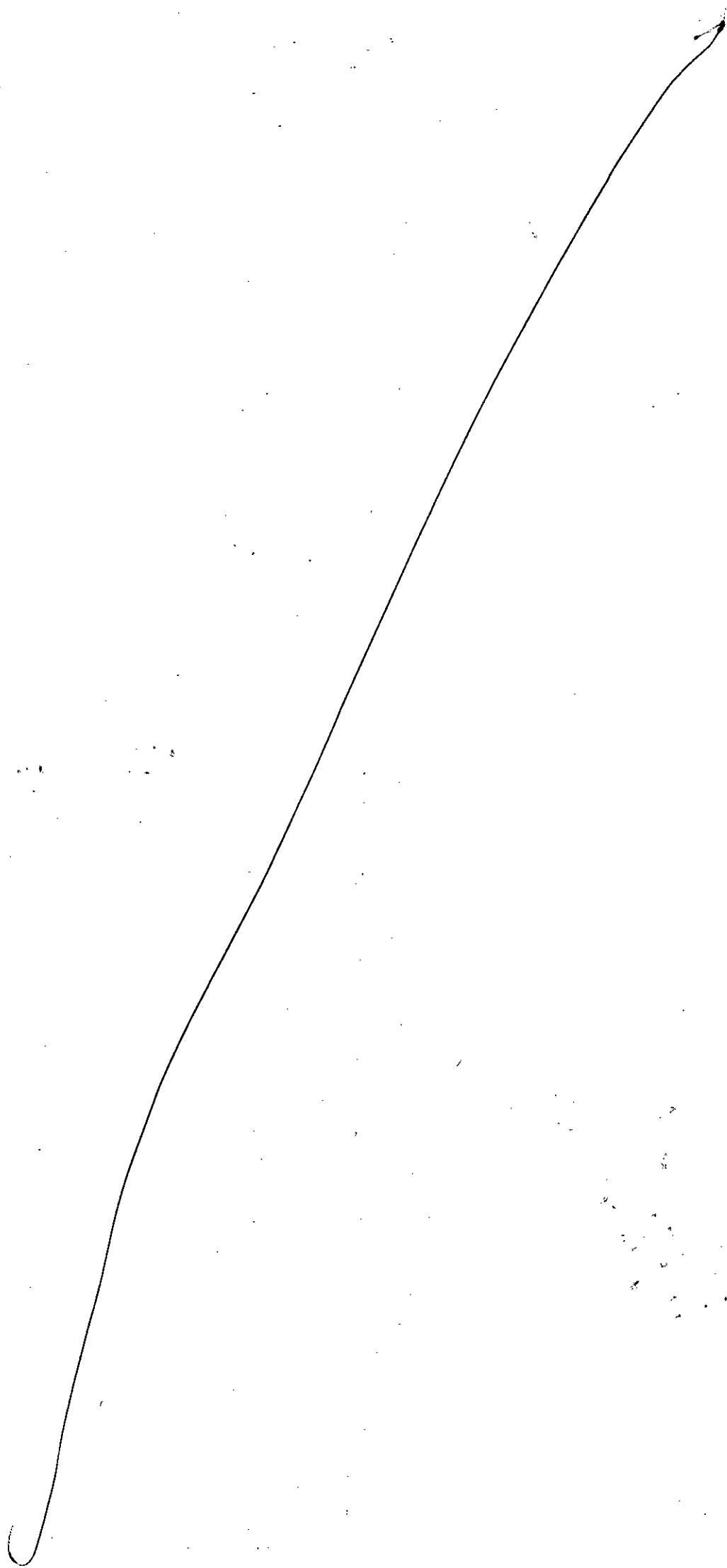
Court of _____

Restoration Application No. 681/2022

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	15.11.2022	<p>The application for restoration of Appeal No.1335/2019 submitted today by Naila Jan Advocate. It is fixed for hearing before Division Bench at Peshawar on <u>29-11-22</u>. Original file be requisitioned. Notices be issued to applicant and his counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman</p> <p style="text-align: right;"> REGISTRAR.</p>
	29 th Nov, 2022	<p>None for the petitioner present.</p> <p>Notices be issued to the petitioner and his counsel. To come up for arguments on restoration application on 04.01.2023 before S.B.</p> <p style="text-align: right;">(Kalim Arshad Khan) Chairman</p>

*Noted
by
Kalim Arshad Khan
29/12/2022*

SCANNED
BT
Peshawar




17.10.2022

Nemo for the appellant. Mr. Mehtab Gul, Law Officer alongwith Mr. Naseer-ud-Din Shah, Assistant Advocate General for official respondents present.

The appeal in hand was called on for hearing after various intervals, however none appeared on behalf of the appellant till the closing time, therefore, the appeal in hand stands dismissed in default. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

17.10.2022



(Mian Muhammad)
Member (Executive)

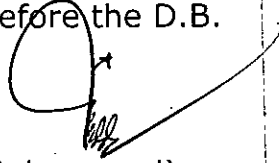


(Salah-Ud-Din)
Member (Judicial)

07.07.2022

Clerk of learned counsel for the appellant present. Mr. Muhammad Tufail, Assistant and Mr. Mehtab Gul, Law Officer alongwith Asif Masood Ali Shah, Deputy District Attorney for official respondents No. 1 to 6 present.

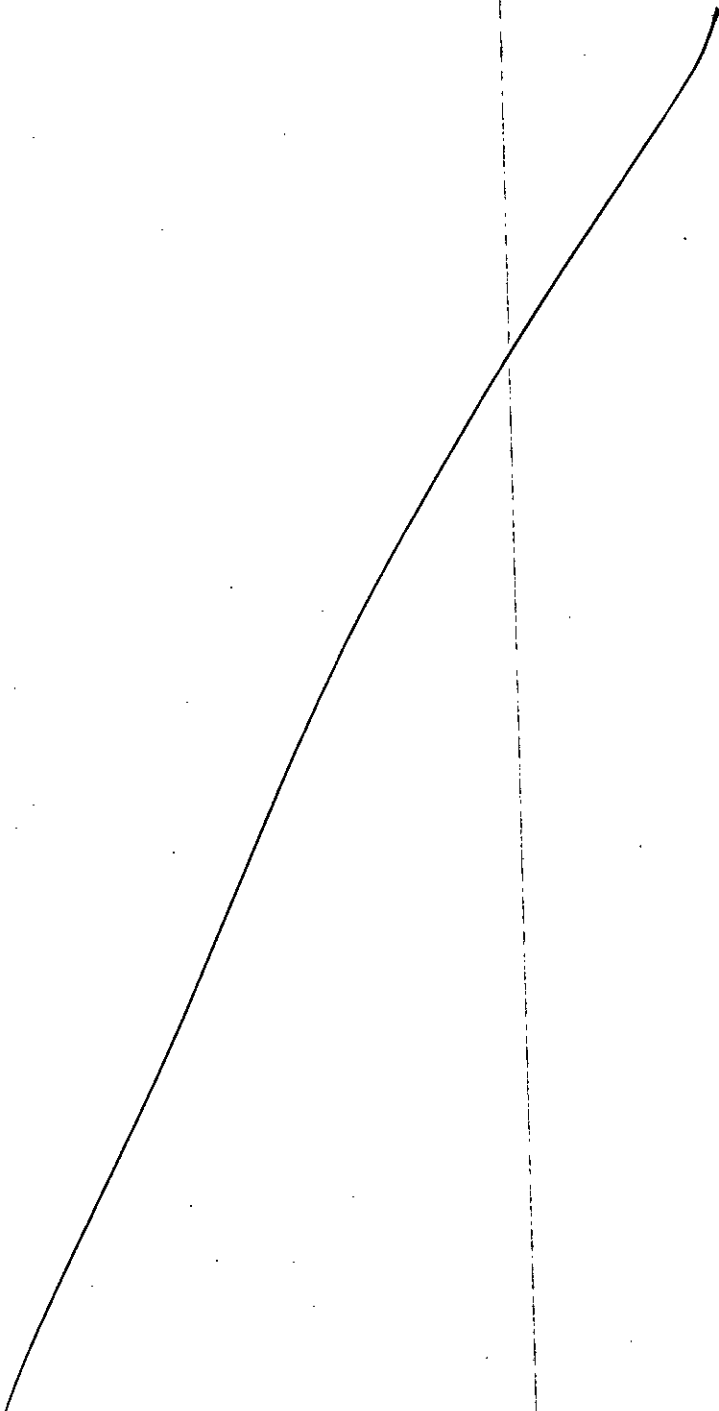
Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments on 17.10.2022 before the D.B.



(Mian Muhammad)
Member (E)



(Salah-ud-Din)
Member (J)



46

09.12.2021

Junior to counsel for the appellant and Mr. Noor Zaman, District Attorney alongwith Hamid Saleem, Law Officer for the respondents present.

Senior counsel for the appellant is stated to be busy before the Hon'ble High Court today. Request for adjournment is made by his junior. Request is accorded. To come up for arguments on 30.03.2021 before the D.B.

(Salah-ud-Din)
Member(J)

Chairman

30-3-2022

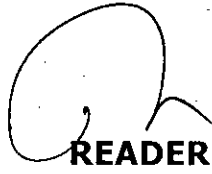
Proper DB not available the case is
Adjourned to come up for the same as
before on 7-7-2022

Reader

46

01.03.2021

Due to COVID-19, the case is adjourned for the same on 01.06.2021.



READER


01.06.2021

Appellant alongwith Miss. Naila Jan, Advocate, present. Mr. Hamid Saleem, Law Officer (Public Service Commission) and Mr. Hayat Khan, Assistant Director (Education Department) alongwith Mr. Kabirullah Khattak, Additional Advocate General for the official respondents present.

Joint para-wise comments on behalf of respondents No. 1 to 6 submitted, which are placed on file and copy of the same handed over to learned counsel for the appellant. Adjourned. To come up for rejoinder as well as arguments before the D.B on 02.08.2021.



(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)




(SALAH-UD-DIN)
MEMBER (JUDICIAL)

02.08.2021

Appellant in person present.

Mr. Kabirullah Khattak, Additional Advocate General alongwith Hamid Saleem, Law Officer for respondents present.

Appellant requested for adjournment on the ground that his counsel is not available today. Adjourned. To come up for arguments on 09.12.2021 before D.B.



(Atiq-Ur-Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

18
Appeal No. 1335/2019
Inamullah vs Govt

06.10.2020

Junior to counsel for the appellant, Addl. AG for the official respondents and Private respondents No. 30, 43, 44 and 46 in person present.

Learned AAG and private respondents No. 30, 43, 44 & 46 seek further time for submission of reply/comments. Nemo on behalf of ~~other private respdts~~ nor their reply received despite proper notice, hence proceeded against ex-parte. Learned AAG is required to contact the official respondents and facilitate the submission of reply/comments on next date of hearing. To come up for reply/comments of official respondents as well as private respondents No. 30, 43, 44 and 46 on 01.12.2020 as a last chance.

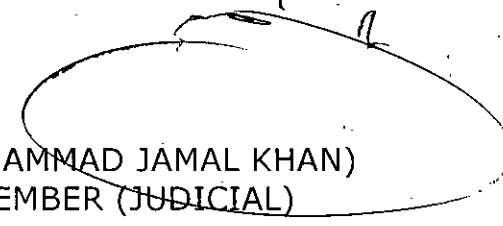

Chairman

01.12.2020

Junior counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General and Mr. Mehtab Gul, Litigation Officer, for official respondents are also present.

Neither written reply/comments on behalf of private respondents No. 30, 43, 44 & 46 have been submitted nor anyone on their behalf is present, therefore, they are proceeded against ex-parte.

Written reply/comments on behalf of official respondents have also not been submitted so far despite the last chance given in the previous order sheet dated 06.10.2020, therefore, the case is adjourned to 01.03.2021 on which data file to come up for arguments before D.B.


(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

03.04.2020

Due to public holiday on account of COVID-19, the case is adjourned for the same on 26.06.2020 before S.B.

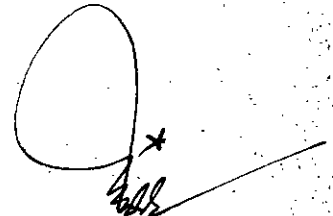

Reader

26.06.2020

None for the appellant present. Addl: AG for respondents present.

Written reply not submitted. Learned AAG seeks time to submit the same on the next date of hearing.

Adjourned to 13.08.2020 before S.B.


MEMBER

13.08.2020

Junior to counsel for the appellant. Nemo for the respondents.

Fresh notices be issued to the respondents. Adjourned to 06.10.2020 on which date the requisite reply/comments shall positively be furnished.



Chairman

20

06.01.2020

Counsel for the appellant present.

One again learned counsel requests for time to prepare the brief regarding jurisdiction of this Tribunal as noted in the previous order. Adjourned to 06.02.2020 before S.B.


Chairman

06.02.2020

Counsel for the appellant Inamullah present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant alongwith others were recommended by the Public Service Commission for the post of ADO (BPS-16). It was further contended that a merit list was issued by the Public Service Commission wherein the appellant was shown at serial no. 144 and he was shown to have obtained 61/38 marks. It was further contended that on the basis of said merit list a seniority list was issued wherein the appellant was shown at serial no. 127. It was further contended that the Public Service Commission has not given additional two marks of his passing Pak Study subject although the Public Service Commission was required to issue further two marks for his passing Pak Study subject. It was further contended that due to non-giving to two additional marks his name was placed junior in the merit list as well as seniority list, therefore, the appellant filed departmental appeal but the same was rejected. It was further that the respondent-department is bound to issue two additional marks in the merit list and also to place his name at serial no. 67 instead of 127 in seniority list.

The contentions raised by the learned counsel for the appellant need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 03.04.2020 before S.B.

Appellant Deposited
Security & Process Fee

13/2

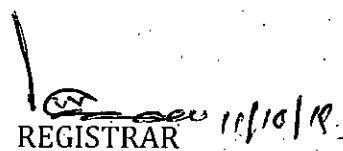
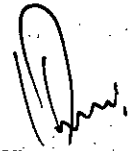


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1335/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/10/2019	<p>The appeal of Mr. Inamullah resubmitted today by Naila Jan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 11/10/19</p>
2-	14/10/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>27/11/19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
27	11.2019	<p>Counsel for the appellant present.</p> <p>Learned counsel requests for time to further prepare the brief regarding the jurisdiction of this Tribunal in the instant matter when his grievance is against the Public Service Commission regarding allocation of marks for additional qualification.</p> <p>Adjourned to 06.01.2020 before S.B.</p> <p style="text-align: right;"> Chairman</p>

The appeal of Mr. Inamullah son of Taj Muhammad ADEO Establishment DEO Male Peshawar received today i.e. on 19.09.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Addresses of respondent Nos. 7 to 72 are incomplete which may be according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 3- Affidavit may be got attested by the Oath Commissioner.
- 4- Copy of rejection order of departmental appeal dated 26.8.2019 mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- 5- Annexures of the appeal may be annexed serial wise as mentioned in the memo of appeal.
- 6- 66 more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1642 /S.T,

Dt. 25-9-2019.

[Signature]
REGISTRAR

SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Naila Jan Adv. Pesh.

Resubmitted by Naila Jan Advocate

ad returned as the objections.

1) Appeal has been signed.

2) Address of respondents are completed.

3) Affidavit has been attested.

4) Rejection order is not available however the same may kindly be requisit from the official respondents.

5) Annexures of appeal has been serial wise.

6) 66 more copies/sets of appeal, will forward to respondents later when they require.

mailed after the admission of appeal. *[Signature]* 3/10/2019

11/11
11/11

if any further work
 is required please refer to
 the original report of
 the officer who has been
 assigned to this matter.
 The original report of
 the officer who has been
 assigned to this matter
 is not available however
 the original report
 has been submitted
 and reviewed on the
 subject of
 the original report of
 the officer who has been
 assigned to this matter.

(1)
 (2)
 (3)
 (4)
 (5)

23

SCANNED
KPST
Peshawar

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

Appeal no. 1335/2019
Inamullah

VERSUS

Chief Secretary Khyber Pakhtunkhwa Peshawar and
Others

INDEX

<i>S#</i>	<i>Description of Documents</i>	<i>Annex</i>	<i>Pages</i>
1.	Grounds of Appeal		1-10
2.	Affidavit.		11
3.	Addresses of Parties.		12
4.	Application for condonation of Delay		12-A- 12-B
5.	Copies of Educational Documents	"A to C"	13-16
6.	Copy of Application form and Appointment order	"D & E"	17-28
7.	Copy of the Seniority List	"F"	29-39
8.	Copy of the Merit List & PCS Letter dated 03/01/2019	"G & H"	40-46
9.	Copy of Departmental Appeal	"I"	47
10.	Other documents	"J"	48-53
11.	Wakalatnama		54

Dated: 16/09/2019

Inamullah

Appellant

Through

Naila Jan

Naila Jan
Advocate High Court
Peshawar.

16 RECORD YOUR GOVERNMENT, SEMI-GOVERNMENT OR PRIVATE SERVICE.

Employer	Post	Permanent/Temporary	Between period	Grade	Reason for leaving
Elementary and Secondary Education Department	ADEO	Permanent	06/05/2011 - Continue	36	Not Applicable
Elementary and Secondary Education Department	CT	Permanent	27/06/1997 - 05/06/2011	15	promotion
Elementary and Secondary Education Department	PTC Teacher	Permanent	26/05/1994 - 26/06/1997	9	promotion
PPC	Principal	Temporary	09/02/2004 - Continue		Not Applicable

17 HAVE YOU BEEN DISMISSED / REMOVED FROM SERVICE UNDER FEDERAL OR PROVINCIAL GOVERNMENT?

NO

18 I HAVE UP-TO DATE APPLIED FOR THE FOLLOWING POSTS ADVERTISED BY FEDERAL/PROVINCIAL PUBLIC SERVICE COMMISSION

ADEO, ones, Selected

ACADEMIC QUALIFICATION STARTING WITH MATRICULATION EXAMINATION

Certificate/Diploma/Degree	School /College /Institution	Year of Passing as whole or in parts	Marks Obtained /Total Marks	Division and Position in Board/University if 1st, 2nd or 3rd	Subject
MATRICULATION	BISE Peshawar	1987	618/850	1	Science
INTERMEDIATE	BISE Peshawar	1989	499/1100	2nd	Science
BA	University of Peshawar, Peshawar	1994	312/550	2nd	Arts
Masters in Pashto	University of Peshawar, Peshawar	1995	591/1100	2nd	Pashto
B.ED.	Allama Iqbal Open University Islamabad	1998	539/900	1	English and Islamiyat
M.ED.	Allama Iqbal Open University Islamabad	2002	616/1100	2nd	Guidance, Counselling and Elementary Education etc



KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION

7 Fort Road Peshawar Cantt
 Phone : +92-091-9214131, 9212897, 9213563, 9213750
 Fax : +92-091-9211795
 Website : www.kppsc.gov.pk

e-APPLICATION FORM

Payment Information
 Payment Verified
 Transaction ID 575295466
 Amount 325
 Through IC
 Dated 21-02-2018
 Date of online apply 25/02/2018
 Diary Number 30099

Post Applied for: **PRINCIPAL / VICE PRINCIPAL**
 Advertisement No: 3/2018
 Post's Serial No: 22

1	NAME	INAMULLAH	
2	FATHER NAME	TAJ MUHAMMAD	
3	POSTAL ADDRESS	VILLAGE AND POST OFFICE GULOZAI TEHSIL AND DISTRICT PESHAWAR	
	CNIC	17301-0682827-9	
	TELEPHONE	03005854805	MOBILE 03005854805
4	RELIGION	MUSLIM	
	PLACE OF BIRTH,		
6	DISTRICT/AGENCY AND PROVINCE	peshawar	5 DATE OF BIRTH AS PER SECONDARY SCHOOL CERTIFICATE: 21/01/1971
	DISTRICT		
7	AGENCY OF YOUR DOMICILE	PESHAWAR	6 AGE ON RECKONING DATE
	ARE YOU AN EX-SERVICE MAN? (ARMY, NAVY & AIRFORCE)	NO	7 NATIONALITY OF YOUR WIFE/HUSBAND pakistan
8	DO YOU CLAIM PHYSICAL DISABILITY ?	NO	8 ZONE OF YOUR DOMICILE 2
9	EXAM CENTER	PESHAWAR	9 ZONE OF YOUR HUSBAND (MARRIED FEMALE CANDIDATE)
	MARRIED FEMALE CANDIDATES	NAME OF HUSBAND DATE OF MARRIAGE	10 FATHER'S OCCUPATION farming
12	IF YOU HAVE BEEN ABROAD	No	
13	DETAIL OF CO-CURRICULAR ACTIVITIES INCLUDING SPORTS & HOBBIES:		11 Gardening and cricket
14	DETAILS OF YOUR POSTGRADUATE RESEARCH WORK & PUBLICATION. PLEASE BRING THESE DOCUMENTS, WHEN CALLED FOR INTERVIEW		12 Nil

25

1078



KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION

3 Fort Road Peshawar Cantt.
Phone : +92-091-9214131, 9212897, 9213563, 4113750
Fax : +92-091-9211755
Website : www.kpsc.gov.pk

e-APPLICATION FORM

Payment Information
Payment Verified
Transaction ID 57595066
Amount 325
Through IC
Dated 21-02-2018
Date of online apply 23/02/2018
Diary Number 30099

Post Applied for: PRINCIPAL / VICE PRINCIPAL
Advertisement No: 3/2018
Post's Serial No: 22

1 NAME	INAMULLAH	
2 FATHER NAME	TAJ MUHAMMAD	
3 POSTAL ADDRESS	VILLAGE AND POST OFFICE GULOZAI TENSIL AND DISTRICT PESHAWAR	
4 CNIC	17301-068-827-9	
5 TELEPHONE	03005854805	MOBILE 03005854805
6 RELIGION	MUSLIM	5 DATE OF BIRTH AS PER SECONDARY SCHOOL CERTIFICATE: 21/01/1971
7 PLACE OF BIRTH, DISTRICT/AGENCY AND PROVINCE	Peshawar	8 AGE ON RECKONING DATE
9 DISTRICT	PESHAWAR	10 NATIONALITY OF YOUR WIFE/HUSBAND: pakistan
11 ARE YOU AN EX-SERVICE MAN? (ARMY, NAVY & AIRFORCE)	NO	12 ZONE OF YOUR DOMICILE
13 DO YOU CLAIM PHYSICAL DISABILITY?	NO	14 ZONE OF YOUR HUSBAND (MARRIED FEMALE CANDIDATE)
15 EXAM CENTER	PESHAWAR	16 FATHER'S OCCUPATION: farming
17 MARRIED FEMALE CANDIDATES	NAME OF HUSBAND DATE OF MARRIAGE	
18 IF YOU HAVE BEEN ABROAD	No	
19 DETAIL OF CO-CURRICULAR ACTIVITIES INCLUDING SPORTS & HOBBIES:		Gardening and cricket
20 DETAILS OF YOUR POSTGRADUATE RESEARCH WORK & PUBLICATION. PLEASE BRING THESE DOCUMENTS, WHEN CALLED FOR INTERVIEW		Nil

16 RECORD YOUR GOVERNMENT, SEMI-GOVERNMENT OR PRIVATE SERVICE.

Employer	Post	Permanent/Temporary	Between period	Grade	Reason for leaving
Elementary and Secondary Education Department	ADEO	Permanent	06/05/2011 - Continue	16	Not Applicable
Elementary and Secondary Education Department	CT	Permanent	27/06/1997 - 05/06/2011	15	promotion
Elementary and Secondary Education Department	PTC Teacher	Permanent	26/05/1994 - 26/06/1997	9	promotion
PTC	Principal	Temporary	09/02/2004 - Continue		Not Applicable

17 HAVE YOU BEEN DISMISSED / REMOVED FROM SERVICE UNDER FEDERAL OR PROVINCIAL GOVERNMENT?

NO

I HAVE UP-TO DATE APPLIED FOR THE FOLLOWING POSTS AS ADVERTISED BY FEDERAL/PROVINCIAL PUBLIC SERVICE COMMISSION

ADEO, ones, Selected

ACADEMIC QUALIFICATION STARTING WITH MATRICULATION EXAMINATION

Certificate/ Diploma/Degree	School /College /Institution	Year of Passing as whole or in parts	Marks Obtained /Total Marks	Division and Position in Board/University of 1st, 2nd or 3rd	Subject
MATRICULATION	BISE Peshawar	1987	618/850	1	Science
INTERMEDIATE	BISE Peshawar	1989	499/1100	2nd	Science
BA	University of Peshawar, Peshawar	1994	312/550	2nd	Arts
Masters in Pashto	University of Peshawar, Peshawar	1995	591/1100	2nd	Pashto
B.ED.	Allama Iqbal Open University Islamabad	1998	539/900	1	English and Islamiyat
M.ED.	Allama Iqbal Open University Islamabad	2002	616/1100	2nd	Guidance, Counselling and Elementary Education etc

Phone : 091-9213551
Fax : 091-9211795
Website : www.kppsc.gov.pk



**KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
2-Fort Road, Peshawar Cantt.**

140

No. PSC/SR-II/30/(COE)/2020
Dated 19/12/2020

To: The Secretary to Govt. of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department,
Peshawar.

Subject: **RECRUITMENT TO TWO HUNDRED & FOUR (204) MALE PRINCIPAL
VICE PRINCIPAL (BPS-18) IN ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT. (ADVT. NO. 03/2018, S. NO. 22).**

Dear Sir,
In continuation of this office letter No. PSC/SR-II/019295-96 dated: 12.09.2019 on the subject noted above and to state that the Commission provisionally recommends the following candidates to the Government for appointment against the posts of non-joiners vacated by M/s, Gul Khitab S/O Khani Zaqman of District Abbottabad/ 5, Alam Zeb S/O Fazal Rahim of District Swat/ 3, Gul Amin S/O Taj Muhammad Khan of District Nowshera/ 2 and Jameel Ahmad S/O Tarin Shah of District Karak/ 4.

S.No.	Name with father's Name	District / Zone
1	Afzal Shah S/O Habib Said M/o 207	Mohmand Agyal
2	Sayed Mir Hussain S/O Sayed Ali Hussain M/o 208	Kurram Agyal
3	Nasir Ahmad S/O Rashid Ahmad M/o 209	Dir Lower/3
4	Inamullah S/O Taj Muhammad M/o 510	Peshawar/2

2. Recommendation in favour of the recommendees is further provisional subject to their medical fitness, verification of all documents and perusal of their PERs by the department at their own before appointment.
3. Inter Se-Seniority of all the recommendees will be conveyed after completion of remaining cases. The serial chronological order will not confer any right of seniority.
4. Original applications (with enclosures) of the above recommendees are enclosed herewith for your record.
5. Kindly acknowledge receipt.

Faithfully Yours

(Ilyas Shah)
Director Recruitment

Encls: No. PSC/SR-II
Copy forwarded for information to:-

The Director Elementary & Secondary Education Department, Peshawar
(Director Recruitment)

3

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

Appeal No. 1335/2019

Inamullah S/o Taj Muhammad, ADEO Establishment
Office of the DEO (M) Peshawar.

----- (Appellant)

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1284

Dated 19/9/2019

VERSUS

1. The Chief Secretary Khyber Pakhtunkhwa Peshawar.
2. The Chairman Public Service Commission.
3. The Secretary Elementary & Secondary Education Khyber Pakhtunkhwa.
4. The Director Elementary & Secondary Education Khyber Pakhtunkhwa.
5. The Secretary, Public Service Commission.
6. The Executive District Officer, Peshawar.
7. Zia-ur-Rehman S/o Said Rehman ADEO, Peshawar at Serial No. 78 in the Seniority List. Posted at the office of DEO Peshawar.
8. Ihtisham Ul Haq S/o Fazal Haq ADEO at Serial No.79 posted at the office of DEO Malakand.
9. Rahim Khan S/o Hussain Khan at R/o ADEO at Serial No. 80, posted at office of the DEO Peshawar.
10. Muhammad Saleem S/o Ghulam Sarwar, ADEO at Serial No.81, posted at the office of DEO Peshawar.
11. Sikandar Irfan S/o Faizullah Khan ADEO, at Serial No.82, posted at the office of DEO D.I.Khan.
12. Abdul Hafeez S/o Abdul Rashid ADEO, at Serial No. 83, posted at the office of DEO D.I.Khan.
13. Shah Jehan S/o Gul Rahim Khan, ADEO, at Serial No. 84,
14. Ishtiaq Ahmed Khan S/o Muhammad Akram Khan, ADEO at Serial No. 85; posted at the office of DEO Abbottabad.
15. Mati Ullah Khan S/o Darawez Khan, ADEO at Serial No. 86, posted in the office of DEO D.I.Khan.
16. Shabbir Ahmad S/o Qazi Fazli Hanan ADEO, at Serial No. 87, posted at the office of DEO D.I.Khan.
17. Jamshed Khan S/o Mehmood Khan ADEO, at Serial No. 88, posted at the office of DEO Charsadda.
18. Riaz Khan S/o Mir Zali Khan ADEO, at Serial No. 89, posted at the office of DEO Bannu.
19. Rajab Ali S/o Mir Qadam Khan, ADEO at Serial No. 90, posted at the office DEO Bannu.

Filed to-day
Registrar
19/9/19

Re-submitted to-day
and filed.

Registrar
19/10/19

20. Muhammad Tahir S/o Habib Jan ADEO, at Serial No. 91, posted at the office of DEO Dir Lower.
21. Farman Ullah S/o Aman Ullah ADEO at Serial No.92, posted at the office of DEO Peshawar.
22. Syed Ikram S/o Syed Mutamed Khan, ADEO at Serial No. 93, posted at the office of DEO Mardan.
23. Muhammad Azam Khan S/o Gul Khan, ADEO at Serial No. 94, posted at the office of DEO Bannu.
24. Hameed ur Rehman S/o Saeed ur Rehman Assistant Director E&SE KPK at Directorate E&SE KPK, at Serial No. 95
25. Saeed Mahmood S/o Hazrat Mahmood, ADEO at Serial No. 96, posted at the office of DEO Buner.
26. Fazali Qadir S/o Ali Asghar ADEO, at Serial No. 97, posted at the office of DEO Haripur.
27. Fahim Jan S/o Alif Khan ADEO at Serial No.98, posted at the office of DEO Peshawar.
28. Aurangzeb S/o Pidad Khan ADEO, at Serial No.99, posted at the office of DEO Shangla.
29. Asad Ullah Shah S/o Nawab Ali Shah ADEO, at Serial No.100, posted at the office of DEO Bannu.
30. Farman Ullah S/o Afsar Khan ADEO at Serial No.101, posted at the office of DEO Swabi
31. Abdul Waheed S/o Abdul Qadir ADEO, at Serial No.102, posted at the office of DEO Abbottabad.
32. Altaf Hussain S/o Nasrullah Khan ADEO, at Serial No.103, posted at the office of DEO Malakand.
33. Muhammad Alamdin S/o Muhammad Iqbal Din ADEO, at Serial No.104, posted at the office of DEO Bannu.
34. Saleh Badshah S/o Lalbadshah ADEO, at Serial No.105, posted at the office of DEO Lakki Marwat.
35. Nasir Iqbal S/o Sakhi Marjan ADEO, at Serial No. 106, posted at the office of DEO Dir Upper.
36. Akbar Ghani S/o Fateh Muhammad ADEO, at Serial No. 107, posted at the office of DEO Dir Lower.
37. Muhammad Azeem Khan S/o Nawab Khan Assistant Director at Directorate E&SE KPK at Serial No. 108
38. Sikandar Hayat S/o Sadiq Ullah R/o Mohallah Jous Khani, P.O Lahor (Sharqi) Tehsil Lahor District Swabi Officer of DEO E&SE Swabi at Serial No.109
39. Muhammad Noor Sultan S/o Dilawar Khan R/o Chah Malik Wala Near Govt: Degree Collage Tehsil Paharpur District D.I.Khan at Serial No. 110
40. Khawaja S/o Zarin Khan, ADEO at Serial No. 111, posted at the office of DEO Dir Upper.
41. Wisal Muhammad S/o Dost Muhammad Office of DEO E&SE Mardan at Serial No. 112
42. Nisar Ahmad S/o Muhammad Saeed at Office of DEO Mardan at Serial No.113
43. Muhammad Iqbal S/o Baz Mula ADEO, at Serial No.114, posted at the office of DEO Dir Upper.

4

44. Zaheer Ud Din S/o Muhammad Saeed ADEO at Serial No.115, posted at the office of DEO Dir Lower.
45. Habib Ullah S/o Muhammad Aslam R/o ADEO at Serial No.116, posted at the office of DEO Tank.
- ✓ 46. Hafiz Fazl e Akbar S/o Gohar ADEO at Serial No.117, posted at the office of DEO Swabi.
47. Mir Samad Khan S/o Hakeem Khan ADEO at Serial No.118, posted at the office of DEO Battagram.
48. Muhammad Ishtiaq S/o Muhammad Latif ADEO at Serial No.119, posted at the office of DEO Peshawar.
49. Muhammad Naeem S/o Mumtaz Khan ADEO at Serial No.120, posted at the office of DEO Karak.
50. Syed Anwar Ali Shah S/o Syed Mahmood Shah, ADEO at Serial No.121, posted at the office of DEO Haripur.
51. Shah Zar Khan S/o Hafte Khan, Office of DEO E&SE Tank at Serial No.122
52. Muhammad Sharif S/o Sher Khan Office of DEO E&SE Kohat at Serial No.123
53. Abdul Qayyum Khan S/o Abdul Hanan, Assistant Director at Directorate E&SE KPK at Serial No. 124
54. Ihsan Ullah S/o Amar Sher, ADO Hayatabad Circle, Peshawar at Serial No.125
55. Habib Ullah S/o Muhammad Iqbal ADEO at Serial No.126, posted at the office of DEO Peshawar.
56. Muhammad Hayat Khan S/o Masal Khan, ADEO at Serial No.127, posted at the office of DEO Newshehra.
57. Sultan Muhammad S/o Ali Akbar ADEO, at Serial No.128, posted at the office of DEO Mardan.
58. Muhammad Ishaq S/o Muhammad ADEO at Serial No.129, posted at the office of DEO Malakand.
59. Fayaz ud Din S/o Jehan Badshah, ADO at Office of DEO E&SE Dir Upper at Serial No.130
60. Muhammad Hussain S/o Mir Abbas Khan ADEO at Serial No.131, posted at the office of DEO Karak.
61. Muhammad Asif Khan S/o Muhammad Akram Khan ADEO at Serial No.132, posted at the office of DEO Abbottabad.
62. Ata Ullah Shah S/o Ubaid Shah ADEO at Serial No.133, posted at the office of DEO Swabi.
63. Said Zamin Shah S/o Aqlmin Shah R/o Deputy District Officer (E&SE) Male Sama Ranazai Dargai Malakand Agency at Serial No.134
64. Umar Farooq S/o Bahramand ADEO, at Serial No.135, posted at the office of DEO Buner.
65. Syed Ihsan Ullah Shah S/o Syed Lal Badshah ADEO at Serial No.136, posted at the office of DEO Peshawar.
66. Imtiaz Ali S/o Haji Hayat Gul ADEO at Serial No.137, posted at the office of DEO Peshawar.
67. Suhbat Ullah S/o Rehmat Ullah ADEO at Serial No.138, posted at the office of DEO Peshawar.
68. Iftikhar Ali Khan S/o Zarif Khan ADEO at Serial No.139, posted at the office of DEO Mardan.

3

69. Peer Muhammad Khan S/o Nadar Khan ADEO at Serial No.140, posted at the office of DEO Dir Upper.
70. Sakin Shah S/o Muhib Ali Shah ADEO, at Serial No.141, posted at the office of DEO Peshawar.
71. Iran Gul S/o Naseer Khan ADEO at Serial No.142, posted at the office of DEO Tank
72. Mushtaq Ahmad S/o Gul Zar Ahmad ADEO at Serial No.143, posted at the office of DEO Kohat

-----*(Respondents)*-----

SERVICE APPEAL U/S 04 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 (I) AGAINST THE MERIT LIST DATED 10/02/2014 ISSUED BY RESPONDENT No. 4 & 5 WHICH HAS NEVER BEEN COMMUNICATED TO THE APPELLANT AND, (II) FINAL SENIORITY LIST DATED 15/08/2018 OF ADEO(S) AND ASDEO(S) (BPS-16) PREPARED ON THE BASIS OF THE MERIT LIST WHEREBY THE APPELLANT HAS BEEN WRONGLY PLACED AT SERIAL NO. 127 INSTEAD OF PLACING AT SERIAL NO. 67, (III) ORDER DATED 26/08/2019 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REGRETTED.

PRAYER

ON ACCEPTANCE OF THE INSTANT APPEAL, (I) THE MERIT LIST ISSUED BY RESPONDENT NO.4 MAY KINDLY BE REVISED BY ADDING 2 ADDITIONAL MARKS OF M.A PAK STUDIES AND CONSEQUENTLY (II) THE APPELLANT MAY KINDLY BE PLACED AT SERIAL NO.78 OF THE LIST AND ACCORDINGLY THE IMPUGNED SENIORITY LIST MAY KINDLY BE CORRECTED BY PLACING THE APPELLANT AT S.NO: 67 INSTEAD OF

Respectfully Sheweth

1. That the Appellant was highly qualified and has the qualification of M.A (Pashto), M.A (Pakistan Studies) and MEP. (Copies of Educational Documents are annexure A, B & C).
2. That the KPK Public Service Commission advertised some posts of ADO (BPS-16) in the Elementary & Secondary Education and the Appellant being eligible applied for the same and after by mentioning all his educational qualifications in his application form and after going through the selection process, the applicant was recommended for the post and subsequently the appellant was appointed vide Notification dated 05/05/2011 by the Respondent No.3. (Copy of Application form and Appointment order are "D" & "E").
3. That the Respondent No.3 issued final seniority list dated 15/08/2018, but the same was not communicated to the Appellant, however when appellant received the same, the appellant came to know that the same has been prepared on

2

the merit list of PSC which has never been communicated to the appellant. (Copy of the Seniority List is Annexure "F")

4. That thereafter, the appellant got the copy of the merit list, the appellant got the knowledge that the appellant has been placed at Serial No. 144 of the list by showing 61/38 marks obtained and the appellant was not awarded two additional marks of M.A (Pak. Studies). However, when the appellant applied for the result and other documents to the Respondent No.4 and 5. They refused to provide him the documents. However the appellant got the relevant documents through RTI whereby the Respondent No. 4 & 5 took the stance that the appellant claimed/mentioned only M.A (Pashto) which marks awarded to the appellant. The appellant time and again approached the respondents for awarding additional marks according to the application form but in vain. (Copy of the Merit List & PCS Letter dated 03/01/2019 are annexure "G" & "H")
5. That the appellant approached time & again to the respondents for revising the merit list by awarding two additional marks on MA and subsequently placing



name of the appellant at proper place and correction of the impugned seniority list but in vain, hence the appellant filed a departmental appeal through proper channel on 15/05/2019, however, the same was rejected vide order dated 26/08/2019: (Copy of Departmental Appeal is annexure "I")

6. That the appellant has no other adequate remedy, hence to file the instant appeal on the following grounds inter-alia:-

GROUND:

- A. That the impugned merit list / seniority list and orders are against law, rules, principles of natural justice, hence void, ab-initio and liable to be set aside.
- B. That the appellant has mentioned two MA(s) i.e. M.A (Pashto) & M.A (Pak Studies) in his application to PCS and as per Khyber Pakhtunkhwa Public Service Commission Notification dated 15/12/2003 Rule 29 (K) the appellant was entitled for 4 additional marks, however, quite illegally the appellant was awarded only 2 marks, hence the appellant

3

has been treated illegally. (Copy is annexure "J")

C. That due to the illegal merit list, in the impugned seniority list, the appellant name has been wrongly fixed which is also liable to be set aside and both the impugned merit list as well as the Seniority List are liable to be corrected and the appellant be placed Senior from all the private respondents.

D. That all those having additional qualification were treated in accordance with Rule 29 (K) of Public Service Commission Notification on 15/12/2003, however, the appellant has been subjected to discrimination by not treating under the above rules. Hence the Respondents violated Article 25 of the Constitution of Islamic Republic of Pakistan 1973.

E. That the illegal, discrimination and unconstitutional behavior of the Respondent are evident from the fact that, the appellant get the requisite document/ information through RTI.

F. That even in the impugned merit list, the appellant is entitle to be placed senior due to

older in age from the private respondent at S. No131 which is illegal.

G. Any other grounds will be raised at the time of arguments with the prior permission of this Hon'ble Court.

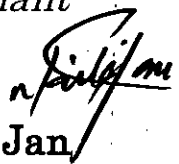
It is, therefore, requested that the appeal may kindly be accepted as prayed for.



Dated: 16/09/2019

Appellant

Through



Naila Jan
Advocate High Court
Peshawar.

4

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

Inamullah

VERSUS

Chief Secretary Khyber Pakhtunkhwa Peshawar and
Others

AFFIDAVIT

I, Inamullah S/o Taj Muhammad, ADEO Establishment Office of the DEO (M) Peshawar, do hereby solemnly affirm and declare that all the contents of the accompanied appeal is true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

Inamullah

DEPONENT

Identified By:

Naila Jan

Naila Jan
Advocate High Court
Peshawar.

ATTESTED
IRFAN ULLAH ADVOCATE
NOTARY PUBLIC

03/12/2019

12

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

Inamullah

VERSUS

Chief Secretary Khyber Pakhtunkhwa Peshawar and
Others

ADDRESSES OF PARTIES

APPELLANT.

Inamullah S/o Taj Muhammad, ADEO
Establishment Office of the DEO (M) Peshawar.


RESPONDENTS:

1. Chief Secretary Khyber Pakhtunkhwa Peshawar.
 2. Chairman Public Service Commission.
 3. Secretary Elementary & Secondary Education.
 4. Director Elementary & Secondary Education Khyber Pakhtunkhwa.
 5. The Secretary, Public Service Commission.
 6. Executive District Officer, Peshawar.
- Zia-ur-Rehman S/o Said Rehman R/o Village Babu
Garhi, P.O Kababyan, Warsak Road, Peshawar.

Dated: 16/09/2019


Appellant

Through


Naila Jan
Advocate High Court
Peshawar.

12/A

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

S.A _____/2019

Inamullah

VERSUS

Chief Secretary Khyber Pakhtunkhwa Peshawar and
Others

APPLICATION FOR CONDONATION OF DELAY

RESPECTFULLY SHEWETH:-

Applicant/Petitioner submits as under.

1. That the above mentioned appeal is filing before this Hon'ble Court in which no date is fixed for hearing so far.
2. That though the appellant is filing this appeal, within 30 days of communication of the final order, however if there is any delay, the same is condonable on the following grounds.

GROUND:

- A. That the appellant has not been communicated the merit list or seniority list.
- B. That everyone has been awarded 2 marks on M.A / Masters, however the appellant has not been treated equally and was discriminated and

12/13

not treated in accordance with notification dated 2003 and according to the judgment of Superior Courts that no limitation runs against discriminatory treatment.

C. That the impugned notifications are void ab-initio, being in violation of the Constitution of Islamic Republic of Pakistan 1973.

D. That as per Supreme Court judgment no limitation runs against Seniority being recurring cause of action.

E. That there are number of precedents of Supreme Court of Pakistan which provides that the cases shall be decided on merits rather than technicalities.

It is therefore requested that the limitation period (if any) may kindly be condone in the interest of justice.


Appellant

Through

Naila Jan
&
Huma Khan

Advocates, High Court
Peshawar.

Dated: 16/09/2019

Sheet 'A'

University of Peshawar

(Pakistan)

Session ANNUAL 1995

NAME: ISMAILAH SON OF TAJ MUHAMMAD and a student

of DISTRICT PESHAWAR being passed the prescribed examination held in April, 1996, is this day admitted by the University of Peshawar

M.A. in Arts

to the Degree of M.A. in Arts in the SECOND Division.

The subject of Examination being PASHTO The Examination was taken as a whole / in parts.

[Signature]

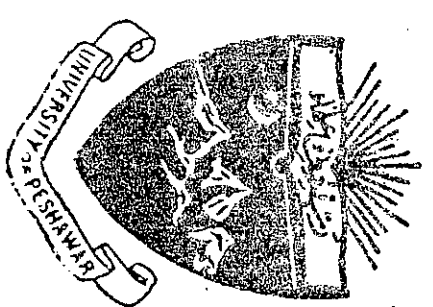
Page: 090 (II)

Serial No: 021036

Registered No: 90-1-14117

10073

Result declared on October 14, 1996



[Signature]
Amjad Ali Khan
M.A. M.A. SET
Vice-Chancellor

بہاء الدین زکریا یونیورسٹی ملتان (پاکستان)

**BAHAUDDIN ZAKARIYA UNIVERSITY
MULTAN - PAKISTAN**

'B'
Amir



**FACULTY OF ARTS-
SOCIAL SCIENCES**

آرٹس - سوشل سائنسیز فیکلٹی

Certified that Inam Ullah
s/o d/o Taj Muhammad
of District Multan

تصدیق کی جاتی ہے کہ
بنامہ بنت
از
انعام اللہ
تاج محمد
ضلع ملتان

has passed the ^X Annual Examination for the
degree of Master of Arts of the academic
session 1999 held in Oct-Nov, 1999
and has been placed in Third Division.
Having fulfilled the requirements he/she has
been admitted to the degree of
MASTER OF ARTS IN PAKISTAN STUDIES
in this University.
Marks obtained : 422/1000
The examination was taken as ~~XXX~~ole/in parts.

نے ایم۔ اے کے پہلے دور کے سالانہ امتحان
بابت
سیشن 1999
میں کامیاب ہو کر
ابتداءً تھرڈ ڈیویژن میں شامل ہوئے
کی بناء پر انہیں اس یونیورسٹی کی
ایم۔ اے کے مطالعہ پاکستان
کی سند کا اہل قرار دیا جاتا ہے
حاصل کردہ نمبر: 422/1000
امتحان ایک ~~XXX~~ / بالاقساط دیا گیا۔

Amjad Ali Khan
M.A. M.Ed. SET
Controller of Examinations

Taseer

Multan, Dated _____

ملتان، تاریخ _____

Roll No. E-6755740

2211-24427

Amjad

Allama Iqbal Open University



علامہ اقبال اوپن یونیورسٹی

22488

نمبر شمار

INAMULLAH

Regn. No. 96-NFR-1973

جبرائیل نمبر

انعام اللہ

تاج محمد

صحت/ص

son/daughter of TAJ MUHAMMAD

having completed the prescribed requirements

کے ساتھ ۱۹۹۷ میں مطلوبہ شرائط مکمل کرنے پر

in 1977 is awarded the degree of

Bachelor of Education

بی۔ ایڈ

(Signature)

He/She secured 60 % marks and was placed in B grade.

کے ذریعہ امتحان کی اس نے 60 فیصد نمبر لے کر بی گریڈ حاصل کیا۔

(Signature)

Vice Chancellor

وائس چانسلر

(Signature)

Controller of Examinations

کنٹرولر امتحانات

Islamabad

Dated: 21st May, 1998.

This degree is to be read in conjunction with the Transcript, issued separately.

1998

Amjad Ali Khan
M. A. M. Ed. SET
G. I. S. No. 105/10000

REVISED

Amjad



Roll No.
J-6611207

Registration No.
96-NPR-0073

TRANSCRIPT

This is to certify that Mr/Ms. **INAM ULLAH**
 Son/Daughter/of **TAJ MUHAMMAD**
 has completed all the requirements of *M.Ed* (**TEACHER EDUCATION**) degree
 programme with the following courses in Spring / Autumn **AUTUMN, 2001** Semester

Course Code	Title of the Course	Marks %	Grade
831	FOUNDATION OF EDUCATION	49	
837	EDUCATIONAL RESEARCH	49	
838	CURRICULUM AND INSTRUCTION	52	
840	EDUCATIONAL PSYCHOLOGY AND GUIDANCE	50	
826	ELEMENTARY EDUCATION	58	
827	SECONDARY EDUCATION	52	
828	HIGHER EDUCATION	56	
829	TEACHER EDUCATION	62	
841	EDUCATIONAL MEASUREMENT AND EVALUATION	67	
843	GUIDANCE AND COUNSELLING	54	
505	ECONOMICS AND FINANCE OF EDUCATION	67	
<i>Amjad</i>			
Amjad Ali Khan M. A. M. Ed. SET C. No. 123456789			
Total Marks Obtained		616/1100	

He/She has obtained 56 % marks and has been placed in grade B

RESULT DECLARED ON **SEPTEMBER 27, 2002**

Dated **MAY 10, 2004**

Amjad
 Controller of Examinations

Note: This Transcript is issued, errors and omissions expected, as a provisional document only. It has no legal value independent of the result gazette of the University and the degree will be awarded in due course of time.

Amjad

17

67

D

Form D No. 1

attached

INSTRUCTIONS

These instructions are for your guidance. Do not detach this sheet from the application form. Read it carefully before filling the application form and sign it in order of having read and understood these instructions. Submit the application and address with all the related documents to Secretary, N.W.F.P. Public Service Commission, 2-Fort Road, Peshawar Cantt.

1. **Filling of Application Form :-** Fill legibly in your own handwriting. Answer all columns. Write "not applicable" or "Nil" against column which does not apply to you. When information asked for is "Nil". Add white sheet if you find any part of the application form inadequate.

2. **Correspondence :-** In your correspondence with the Commission, quote number of the advertisement with serial number of the post applied for and your postal address. It is the responsibility of the Commission of changes in your postal address. The Commission does not accept any responsibility for delayed or undelivered communications.

3. **Submission of Application Form :-** The Application Form should be submitted through postal means or by hand.

4. **Serving Candidates :-** Candidates who are already in service of Government/Semi Government/Autonomous Bodies may apply direct to the Commission if they are unable to obtain the departmental permission before the closing date for the applications. The Commission does not allow any extra time beyond the closing date, for postal transit or for routing the application through the Department. However, such candidates must submit the certificate of the departmental permission on Form 'D' attached at page 6 of the application form within 30 days of the closing date failing which their applications will be liable to rejection.

5. **Age of the Candidate :-** Age in all cases shall be reckoned on the date specified in the advertisement.

6. **Age concession :-** This is given in the upper age limits as under:

- (a) 3 years to candidates from Zones-1 and 3.
- (b) Period of service under Government, if terminated for want of vacancy.
- (c) In case of Ex-Armed Forces Personnel, the entire period of service in Armed Forces or 10 years, whichever is less.
- (d) Special concession mentioned in the advertisement.

7. **Age Relaxation :-** All Administrative Departments are competent to grant age relaxation upto five years whereas Establishment and Administration Department is competent to deal with cases beyond this limit. Minimum age limit, however, cannot be relaxed in any case.

8. **Certificates :-** Send attested photo copies of the certificates and documents as listed in column 20 of the application form. If a document does not apply to you write "not applicable" in the column for the page number. Only regular, degree or provisional certificates issued by the Controller of Examinations shall be accepted. Original certificates and testimonials are required at the time of interview.

9. **Zones :-** The Province is divided into five zones comprising the area listed below:

- (a) **Zone 1:-** Agencies of Bajaur, Mohmand, Khyber, Kurram, Orakzai North Waziristan, South Waziristan and Frontier Regions attached to the to the District of Peshawar, Kohat, Bannu and Dera Ismail Khan.
- (b) **Zone 2 :-** Districts of Peshawar, Charsadda, Nowshera, Swabi and Mardan.
- (c) **Zone 3:-** Districts of Swat, Buner, Dir, Chitral, Kohistan, Shangha Par and Malakand Areas (Swat, Ranizai and Sam Ranizai and backward areas of Hazara Division i.e. (1) Ilaga Upper Tanawal composed of Darband area of Tehsil Hanpur and Shergarh area of District Mansehra and (2) Merged Areas composed of Battagram including Hill Nalshang and Thakot, Aliai, Kaya Khabbal and Gadoon Area.
- (d) **Zone 4:-** Districts of Dera Ismail Khan, Tank, Bannu, Lakki Marwat, Kohat and Karak.
- (e) **Zone 5:-** Districts of Haripur, Abbotabad, Mansehra excluding their backward areas included in Zone 3.

10. **Zonal Allocation :-** Zonal allocation exists for posts to be filled through competitive examinations will be made as per Government policy.

11. **Domicile of Female Candidates :**

- (a) In the case of married female candidates their husband domicile will be required if they were married before entry into Government Service.

8 11/47

N.-W.F.P. PUBLIC SERVICE COMMISSION
APPLICATION FORM

APPLICATION NO. 137782

APPLICATION FEE

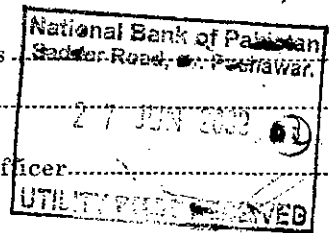
Rs. 285/- + Rs. 15/- Bank Charges
Total Rs. 300/-

FOR BANKS USE ONLY

Amount paid in words

Signature of Bank's Officer

Seal of the Branch



Post applied for Male Assistant District Officer

Advertisement No. 05/2009

Serial No. of Post 07



1. Name in block letters	<u>INAMULLAH</u>	
2. Father's Name in block letters	<u>TAT MUHAMMAD</u>	
3. (a) Postal Address	<u>VILLAGE AND P. GULLUZAT TEHIL AND DISTRICT PESHAWAR</u>	
(b) Permanent address, if different from 3(a)		
(c) No. of National Identity Card	<u>17301-06828A7-9</u>	
(d) Telephone No.	Residence <u>091-2920680</u>	Office <u>091-5211502</u>
4. Religion	<u>ISLAM</u>	
5. (a) Date of birth as per Secondary School Certificate.	<u>21-01-1971</u>	
(b) Age on reckoning date.	<u>38</u> Year <u>5</u> Month <u>13</u> Days	
6. (a) Place of birth, District/ Agency and Province.	<u>Peshawar (NWFP)</u>	
(b) Nationality of your wife/ husband	<u>Pakistani</u>	
7. (a) District/Agency of your Domicile.		
(b) Zone of your Domicile. Tick mark (✓) the appropriate box (see details of Zone under Para 10 of Instructions attached with this form).	<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5	
(c) Zone of domicile of your husband (for married female candidates).	<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5	

NWFP PUBLIC SERVICE COMMISSION
04 JUN 2009
DIA/3068

MC

ACADEMIC QUALIFICATION STARTING WITH MATRICULATION EXAMINATION

1 Certificate / Diploma / Degree / Postgraduate Degree	2 School / College / Institution	3 Board / University	4 Year of Passing as a whole or in parts.	5 Marks obtained and total Marks.	6 Division and position in Board / University, if 1st, 2nd or 3rd.	7 Subject
i) S.S.C.	GHS No: 2 Pesh City	BISE Pesh	1987 As a whole	618/850	1st	Phy, Chem, Bio & Maths
ii) F.Sc	Islamia College Pesh	-do-	1989 in parts	499/1100	2nd	Phy, Chem & Maths
iii) B.A.	Private	University of Peshawar	1991 as a whole	312/550	2nd	Pashto, Islamic studies
iv) M.A.	-do-	-do-	1995 as a whole	591/1100	2nd	Pashto ✓
v) M.A.	-do-	-do-	-do-	-do-	-do-	Pakistan studies ✓
vi) B.Ed	AIOU Islamabad	B.2. Univer sity Multan AIOU 1997 As a whole	1999 As a whole 1997 539/900 as whole	422/1000 1st, $\frac{539}{900}$	3rd 1st	English, Perspective of Folk
vii) M.Ed	-do-	AIOU	2002 As a whole	616/1100	2nd	Guidance & Counselling Economic & Finance of Edu:

Note: In case of your claim to an equivalent of the prescribed qualification, state if it is recognized by the University Grants Commission. Add.

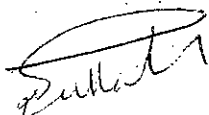
- (a) Copy of the Charter of the Institution.
- (b) Syllabi of the Examination.
- (c) Copy of Detailed Marks Certificate.

W/P

Name of document.	Page No.
(2) A copy of the Notification of admission and enrolment as a Pleader/Advocate, if you are a practising lawyer and claim benefit for age relaxation.
(o) Age Concession Certificate.
(p) Certificate in support of any other claim not covered by the above.
(q) Any other document that you have attached.
.....
.....
.....
.....
.....
(r) I solemnly declare that to the best of my knowledge my replies are correct.

Place

Date


Signature of the Applicant





Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PH No. 091-9210437-38, 9210389

Notification.

Consequent upon the recommendation of the Khyber Pakhtunkhwa Public Service Commission, the Competent authority is pleased to appoint the following candidates against the post of Assistant Distt: officer (Male) in BPS-16 (Rs.6660-470-20160) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Management Cadre on the terms and condition given below with immediate effect.

SNO	Name	Father name	Domicile	address	Services placed at the disposal of EDO (E&SE) for further posting
102	1 Abdul Waheed	Abdul Qadir	Abbottabad	Vill: Akhora PO Qalandarabad, Tehsil & Distt: Abbottabad	Abbottabad
	2 Chanzeb	Zardad Khan	Abbottabad	Vill: Islam kot PO APS Abbottabad Tehsil & Distt: Abbottabad	Abbottabad
85	3 Ishtiaq Ahmed Khan	Muhammad Akram Khan	Abbottabad	Vill: Dhodial Nawan Shehr distt: Abbottabad	Abbottabad
139	4 Muhammad Asif Khan	Muhammad Akram Khan	Abbottabad	H.# TC 1864 Vill: Dhodial PO Nawan Shehr Abbottabad	Abbottabad
	5 Muhammad Tanvir	Faqir Muhammad	Abbottabad	St: No-10 Bilal Town Kakul Road A.Abad.C/o Sajid kariana Store Bilal Town	Abbottabad
	6 Munib ur Rehman	Abdul Ghafoor	Abbottabad	Vill: & P/O Via Lora Murree, Sub Office Ghambir Distt: Abbottabad P.Code 22370	Abbottabad
	7 S.Irshad Ali	Ali Afsar	Abbottabad	Vill: Jausa Muhallah Doong P/O Kala Bagh Tehsil & Distt: Abbottabad	Abbottabad
	8 Shafiqur Rehman	Zia-ul- Haq	Abbottabad	College of Army education upper topa murree (Punjab Province)	Abbottabad
	9 Sharafat Khan	Muhammad Aslam Khan	Abbottabad	Vill: & P/O Narrian Sar Bhana Distt: Abbottabad	Abbottabad
	10 Syed Mahmood ul Hassan	Syed Sarwar Shah	Abbottabad	Near Govt: Girls Degree College Havelian, Distt: & Tehsil Abbottabad	Abbottabad
	11 Waseem Fazal	Fazal ur Rehman	Abbottabad	House # K419/2 Kunj & Adeem Abbottabad	Abbottabad
	12 Zaffar Khan	Munawar Khan	Abbottabad	C/O Muhammad Mumtaz Khan H.# 51/3 MES Colony Jinnah road Cantt Bazar Abbottabad	Abbottabad
	13 Rab Nawaz	Gul Dad Khan	Abbottabad	H.# L.M. 876, Lower Malik Pura, Qazi Mohallah Chitta Pul Abbottabad	Abbottabad
	14 Muhammad Ishfaq Khan	Muhammad Hussain Khan	Abbottabad	H.No 786/A Moh: Qilla Near Labh pati Chowk Nawan Sher Abbottabad	Abbottabad
	15 Ashraf Ali	Abdullah Khan	FR Bannu	Vill: Painsa Khel PO Domel Distt: Bannu C/O Amir Nawaz S/Keeper Domel	Bannu
04	16 Muhammad Alam Din	Muhammad Iqbal Din	FR Bannu	Vill: Landi Jalandar PO Azim Killa Tehsil & Distt: Bannu	Bannu
	17 Muhammad Irshad	Niaz Farid	FR Bannu	Vill. Aimal Kala P/O Azim Kala Tehsil & Distt: Bannu	Bannu
	18 Muhammad Tariq	Noor Ali Khan	Bannu	Vill: Mula Khel P/O Sikander Khell Bala Surani Bannu	Bannu
	19 Waheed Ullah Shah	Mazhar Ali Shah	Bannu	H.#391/c Mohallah Bhatia Bannu city	Bannu

SNO	Name	Father name	Domicile	address	Services placed at the disposal of EDO (E&SE) for further posting
100	20 Asad Ullah Shah	Nawab Ali Shah	Bannu	H.# 391/C Moh: Bhatia Bannu city	Bannu
	21 Haq Nawaz	Ahmad Khan	Battagram	GCMHS Battagram Tehsil & Distt: Battagram	Battagram
118	22 Mir Samad Khan	Hakeem Khan	Battagram	New Tariq Electric Store Main Bazar Battagram	Battagram
	23 Wali ur Rehman	Fojun Khan	Battagram	Faisal Medical Center near petrol Pump Battagram Distt: Tehsil & P/O Battagram	Battagram
	24 Aman ul Mulk Shah	Said Ali Shah	Buner	Vill: Kalpani PO & Tehsil Daggar Buner.	Buner
96	25 Saeed Mahmood	Hazrat Mahmood	Buner	Vill: Sura P/O Nawagai Tehsil Daggar Distt: Buner	Buner
	26 Said Zahid	Faiz Mahmood	Buner	Vill: Shal Bandi P/O Tehsil Daggar Distt: Buner	Buner
	27 Shah Jehan	Gul Rahim Khan	Buner	Vill: Shal Bandi P/O Tehsil Daggar Distt: Buner	Buner
135	28 Umar Farooq	Behramand	Buner	Vill: Karapa P/O Tehsil Distt: Buner	Buner
	29 Humayan Khan	Muslim Khan	Charsadda	VPO Matta Mughal Khel Moh: Panangzai distt: Charsadda	Charsadda
	30 Janas Khan	Lal Rahim	Charsadda	Vill: Khybary (Malak Abad) Near Matta PO & Tehsil Shabqadar Distt: Charsadda	Charsadda
87	31 Shabbir Ahmad	Qazi Fazli Hanan	Charsadda	Vill: P/O Umarzai Mohallah Parach-Khel Tehsil & Distt: Charsadda	Charsadda
	32 Shams ul Islam Niaz	Niaz Muhammad	Charsadda	Vill: P/O Dargai Mohallah Shaheed Abad Tehsil & Distt: Charsadda	Charsadda
	33 Syed Fazle Amin	Mir Hatim Shah	Charsadda	Mohallah Babra P/O Charsadda Town Tehsil & Distt: Charsadda	Charsadda
	34 Ahmad Ullah	Nasar Ullah	Charsadda	Vill: Ochawala PO & Tehsil Shabqadar Distt: Charsadda	Charsadda
	35 Abdus Samad Jan	Sultan Ahmad	Peshawar	Anis Abas No.1, Yousafabad, Dalazak road Peshawar City.	Charsadda
92	36 Farnan Ullah	Aman Ullah	Peshawar	VPO Chamkani Moh: Qadakhail Tehsil & Distt: Peshawar	Charsadda
	37 Hamood ur Rehman	Maqbool ur Rehman	Peshawar	VPO Mian Gujar Tehsil & Distt: Peshawar	Charsadda
37	38 Imtiaz Ali	Haji Hayat Gul	Peshawar	Ejaz Abad No.2 Riaz st. Gul bahar No.4 Peshawar	Charsadda
	39 Jehangir Khan	Shah Jehan	Peshawar	St. No.12, Near Ittehad Masjid, Afghan Colony Peshawar City	Charsadda
	40 Shah Jehan Khan	H. Aslam Khan	Peshawar	Vill: & P/O Gulozai Tehsil & Distt: Peshawar	Charsadda
	41 Mehmoob Ilahi	Rehmat Ilahi	Chitral	Vill: Broze PO Broze Tehsil & Distt: Chitral	Chitral
	42 Miftahuddin	Akbar Khan	Chitral	Vill: Utrai PO Garam Chashma Tehsil & Distt: Chitral	Chitral
	43 Shahzad Nadeem	Khurshid Ahmad	Chitral	Vill: Makhtoom Abad. P/O Chitral	Chitral
	44 Sharaf ud Din	Gul Nadir Khan	Chitral	Vill: & P/O Reshun, Tehsil Mastuj, Distt: Chitral	Chitral
107	45 Akbar Ghani	Fateh Muhammad	Dir Lower	VPO Rabat Tehsil Balambat Dir Lower	Dir Lower
	46 Ali Haider	Bahadar Khan	Dir Lower	O/O EDO (E&S.E) Dir Lower	Dir Lower
	47 Bakht Zada	Mashan Gul	Dir Lower	Vill: Koz Kalay Tehsil Khall District Dir Lower	Dir Lower
	48 Imtiaz Khan	Gul Zaman Khan	Dir Lower	C/O master Electric Store Zia Market Timergara Dir Lower	Dir Lower

SNO	Name	Father name	Domicile	address	Services placed at the disposal of EDO (E&SE) for further posting	
49	Muhammad Islam	Fateh Ul Mulk Khan	Dir Lower	C/O Muhammad Rahman Book DEPQ Temor Palazah Main Bazar Timergara	Dir Lower	
50	Muhammad Khitab	Gulab	Dir Lower	Vill: & P/O Tharai Tehsil Timergara Distt: Dir (Lower)	Dir Lower	
51	Muhammad Raza Shah	Muhammad Hanif	Dir Lower	Moh: Miangano Chum Vill: P/O Ouch Tehsil Adenzai Distt: Dir (Lower)	Dir Lower	
91	52	Muhammad Tahir	Habib Jan	Dir Lower	Muhammad Tahri S/O Habib jan C/O Gul Medicose Near DHQ Hospital Timergara Distt: Dil(Lower)	Dir Lower
53	Nasrullah Khan	Nadar Khan	Dir Lower	Vill: Khema Tehsil Balambat P.O Timargara Distt: Dir (Lower)	Dir Lower	
54	Wajihuddin	Fazal Mabood Jan	Dir Lower	Vill: Kandaro Payeen Tehsil Blaambat P/O timergara Distt: Dir(Lower)	Dir Lower	
125	55	Zaheerur Din	Muhammad Saeed	Dir Lower	Vill: Lasho P/O Pingal Via Batkhela. Tehsil Timagara Dir Lower	Dir Lower
56	Hidayatullah	Khanzada Pacha	Dir Lower	Frontier Children's Academy, Phase IV, Hayatabad Peshawar	Dir Lower	
57	Ajeeb Ullah	Saif Ullah	Dir Upper	VPO Gamseer Jabar Tehsil & District Dir Upper	Dir Upper	
114	58	Muhammad Iqbal	Baz Mula	Dir Upper	Tehsil Wari Distt: Dir Upper	Dir Upper
140	59	Peer Muhammad Khan	Nadar Khan	Dir Upper	Vill: Daskor Payeen P/O Wasi Distt: Dir Upper	Dir Upper
60	Zahir ur Rehman	Mir Hussain	Hangu	Mohallah Mazreen. Vill. & P/O Dallah. Tehsil, Thall. Distt: Hangu	Hangu	
61	Abid Hussain	Hussain Ghulam	Kurrarn Agency	C/O Tahir Hussain Lecturer Maths Department, University of Peshawar	Hangu	
62	Abdul Qayum Khan	Haji Lal Khan	Abbottabad	Moh: Zamin Shah, Depot Road Havelian, Tehsil & Distt: Abbottabad	Haripur	
63	Arshad Mehmood	Ghulam Nabi	Abbottabad	Moh: Sher Khan Havelian Abbottabad	Haripur	
64	Iftikhar Ahmad	Mumtaz Ahmad	Abbottabad	VPO Banda Sahib Khan via Havelian distt: Abbottabad	Haripur	
97	65	Fazal Qadir	Ali Asghar	Haripur	Vill: Kohala Bala Moh: Chetian Qabran PO Lora Post Code 22360 Rawalpindi	Haripur
66	Abdul Wahab	Abdul Ghafoor	Swabi	Moh: Babu Khel, VPO Kotha Tehsil Topi Distt: Swabi	Haripur	
67	Said Bad Shah	Ali Ahmad	Swabi	Vill: P/O Maini Moh: Shakri Shaheedan Tehsil Topi Distt: Swabi	Haripur	
68	Abdullah Khan	Zarghon Shah	Karak	VPO Warana Mir Hassan Khel Tehsil Takht-e-Nasrati, Distt: Karak	Karak	
69	Dil Nawaz Khan	Dashat Mir	Karak	Vill: Sharif Wala PO Latamber Tehsil & Distt: Karak	Karak	
70	Gul Faraz	Shahid Khan	Karak	Vill: Kuch Banda PO, Tehsil & Distt: Karak C/O Rahimullah Jan Postman GPO Karak	Karak	
71	Muhammad Farooq	Gul Raman	Karak	Distt: Tehsil & P/O Karak Vill: Mithawala	Karak	
72	Muhammad Hamayun	Salam Gul	Karak	Tehsil & Distt: Karak Vill: & P/O Mitha Khel	Karak	
73	Muhammad Hussain	Mir Abbas Khan	Karak	Vill: & P/O Surrati Killa Tehsil T/Nasrati Distt: karak	Karak	
131	74	Muhammad Naeen	Mumtaz Khan	Karak	H.No.R-6 University Campus University of Peshawar	Karak

24

SNO	Name	Father name	Domicile	address	Services placed at the disposal of EDO (E&SE) for further posting
106	75 Nasir Iqbal	Sakhi Marjan	Karak	Vill: Easak Chountra P/O Dabb Tehsil & Distt: Karak	Karak
	76 Noor Ajub Khan	Noor Muhammad Khan	Karak	Vill: Walaki Mohabbat Khel P/O Mitha Khel Tehsil & Distt: Karak	Karak
	77 Hafiz Muhammad Ziaullah	Ajab Gul	Kohat	VPO Merozai Tehsil & Distt: Kohat	Kohat
	78 Muhammad Arshad	Wadud ur Rehman	Peshawar	St. No.1 Hussain Town Yousuf Abad Peshawar City	Kohat
	79 Muhammad Sayyar Khan	Muhammad Ullah	Peshawar	Govt: Pri: School Rashid Garhi P/O P.T.I Kohat Road Pesh. City	Kohat
143	80 Mushtaq Ahmad	Gulzar Ahmad	Peshawar	H# 9 St# 5 Shinwari Town Ring Road Peshawar City.	Kohat
80	81 Rahim Khan	Hussain Khan	Peshawar	Vill: & P/O Surigzai Payan Distt: Tehsil Peshawar Mohallah Mamakhede	Kohat
	82 Riaz Hussain	Taj Muhammad	Peshawar	C/O Ghulam Nabi & Sons Bazar Islamabad PO Qissa Khawani Peshawar City	Kohat
741	83 Sakin Shah	Mohib Ali Shah	Peshawar	Vill: & P/O Urmar Payan Distt: Tehsil Peshawar Moh: Yousaf Khel	Kohat
136	84 Syed Ihsan Ullah Shah	Syed Lal Badshah	Peshawar	H.No 2 St No 1 Mohallah Afghan colony Peshawar	Kohat
	85 Abdul Rehman Rashid	Inayatullah Jan	Lakki Marwat	H.# 1159/118, Moh: Khoidad Khel Tehsil & Distt: Lakki Marwat	Lakki Marwat
	86 Habib ur Rehman	Badshah Khan	Lakki Marwat	VPO Shahbaz Khel Dist: Lakki Marwat	Lakki Marwat
	87 Hamid Ullah	Khan Zaman	Lakki Marwat	VPO Ghazni Khel Tehsil & Distt: Lakki Marwat	Lakki Marwat
	88 Hikmatullah	Ali Muhammad	Lakki Marwat	Vill: Chandukhel PO Kot Kashmir Tehsil S/Naurang Distt: Lakki Marwat	Lakki Marwat
105	89 Saleh Bad Shah	Lal Badshah	Lakki Marwat	Vill: Nar Danish Abad P/O EDOS Sultan Abad Serai Naurang Tehsil Serai Naurang. Distt: Lakki Marwat	Lakki Marwat
	90 Tahir Ahmad Khan	Rab Nawaz Khan	Lakki Marwat	St. Meric Khel Vill: P/O Ghazni Khel Distt: Lakki Marwat KPK	Lakki Marwat
	91 Muslim Khan	Anwar Khan	Bajaur Agency	Agency Education Office P/O Khar Bajour Agency	Malakand
	92 Ghulam Sarwar	Ghulam Yahya	Malakand	C/O Waqas Photo State Services, Bahadar Khan Plaza Batkhela Malakand	Malakand
	93 Haya Said	Mian Said	Malakand	VPO Kot distt: Malakand	Malakand
94	94 Ihtisham ul Haq	Fazal Haq	Malakand	Moh: Shabakhel Dheri alahdhand Malakand Agency	Malakand
19	95 Muhammad Ishaq	Muhammad	Malakand	Vill: & P/O Ghawar kalay Sakhakot Tehsil Dargai Distt: Malakand	Malakand
	96 Raees Khan	Sher Zaman Khan	Malakand	Mohallah Baro: Vill: P/O Dheri Alladand Malakand Agency Post Code# 23010	Malakand
34	97 Said Zamin Shah	Aqalmin Shah	Malakand	Deputy District Officer (E&SE) Male Sama Ranazai Dargai Malakand Agency	Malakand
	98 Zakir Hussain	Hussain Gul	Malakand	Farman Medicose Sakhakot Bazar Malakand Agency	Malakand
	99 Fazli Subhan	Fazli Hanan	Malakand	ADO (M) Malakand	Malakand
03	100 Altaf Hussain	Nasrullah Khan	Malakand	VPO Dheri Allahdand, Moh: Baro, Malakand	Malakand
	101 Ghulam Jilani	Darwaish	Mansehra	C/O M. Ishfaq Air Blue CA Travel Agency near Amin Hotel Lari Adda Mansehra	Mansehra

SNO	Name	Father name	Domicile	address	Services placed at the disposal of EDO (E&SE) for further posting	
102	Muhammad Ajmal	Jamal ud Din	Mansehra	GHSS Shergarah Tehsil Oghi distt; Mansehra	Mansehra	
103	Muhammad Ishtiaq	Muhammad Ayub	Mansehra	Vill: & P/O Shinkiari, Muhallah Panj, Ghole Distt: Tehsil Mansehra	Mansehra	
104	Nadeem	Abdul Qayyum	Mansehra	Moh: Malrai Vill: & P/O Dhodial Distt: & Tehsil Mansehra	Mansehra	
105	Naveed Ahmad	Muhammad Farid Khan	Mansehra	C/O Usman P/O Pakh wal Chowk Dab No.2 Mansehra Distt: Mansehra	Mansehra	
106	Rais ur Rehman	Noor ur Rehman	Mansehra	Vill: Shami Bala-P/O Dhodial Tehsil & Distt: Mansehra	Mansehra	
107	Raja Babu Jehangir	Raja Sultan Mubarik	Mansehra	Vill: & P/O Bahali, Tehsil & Distt: Mansehra Via Qalan Dar Abad	Mansehra	
108	Sarfraz Khan	Shahabudd Din	Mansehra	C/O Usman General Store Near Shell Filling Station Mohallah Dab-2 Mansehra	Mansehra	
109	Shafiqur Rehman	Abdur Rehman	Mansehra	Vill: Mohar Khurd P/O Iassan nawab Tehsil & Distt: Mansehar	Mansehra	
110	Syed Anwar Shah	Syed Mardan Shah	Mansehra	Al Quran children Academy Mohallha Upper jabri Near GPO Tehsil & Distt: Mansehar	Mansehra	
111	Amir Badshah	Tamash Gul	Mardan	Muhil Road Moh: Daggar PO Par Hoti District Mardan	Mardan	
139	112	Ifkhar Ali Khan	Zarif Khan	Mardan	Moh: Rawani VPO Takkar Tehsil Takht Bhai Distt: Mardan	Mardan
113	Khalid Khan	Khan Bahadar	Mardan	VPO Madey Baba, tehsil Takht Bhai, Distt: Mardan	Mardan	
114	Muhammad Anwar	Hazrat Umar	Mardan	Distt: Mardan Tehsil T/Bhai VPO Pirsaddi Bar Kanday	Mardan	
115	Muhammad Sadig	Muhammad Kamal	Mardan	Vill: & P/O Dheri Likpani Tehsil & Distt: Mardan	Mardan	
116	Mukhtiar Khan	Ismail Khan	Mardan	Afzal Kutab Khana & General Store Madina Market P/O Tehsil Takat Bhai Distt: Mardan	Mardan	
117	Rohullah Jan	Misbahud Din	Mardan	Vill: Ghraibabad Nisatta Road Near The Fazle Haq Collgee Mradan	Mardan	
128	118	Sultan Muhammad	Ali Akbar	Mardan	Sartaj Iron Mrchat Arif Market B-24 Charsadda road Mardan	Mardan
93	119	Syed Ikram	Syed Mutamed Khan	Mardan	Hamad Medicose Malakand road Takhat Bhai Tehsil & P/O Takhat bhai Distt: Mardan Afzal Imam Colony	Mardan
120	Wazir Zada	Sahib Zada	Mardan	Vill: Pati Khud P/O & Tehsil Takht Bhai Distt: Mardan	Mardan	
121	Abdul Khaliq	Sultani Mahamood	Mardan	C/O NADRA Kiosk Centre, Lund Khawar Mardan	Mardan	
122	Zahir Qamar	Shamsul Qamar	Peshawar	Mohallah Sadozai Vill: P/O Hazr Khwani, Peshawar	Mardan	
123	Imtiaz Khan	Taj Bareen	Nowshera	Moh: Adda VPO Akbar Pura District & Tehsil Nowshera	Nowshera	
124	Muhammad Aftab	Masal Khan	Nowshera	Vill: Zaksi Kuhna PO akbar Pura Distt: Nowshera	Nowshera	
127	125	Muhammad Hayat Khan	Masal Khan	Nowshera	Vill: Zaksi Kuhna P/O Akbar Pura Distt: Nowshera	Nowshera
126	Muhammad Irfan	Mian Fazale Dauran	Nowshera	Vill: & P/O Taru Jabba & Distt: Nowshera	Nowshera	
127	Muhammad Saleem	Abdul Haleem	Nowshera	Vill: Kurvi P/O Taru Jabba Tehsil Pabbi Distt: Nowshera	Nowshera	
128	Muhammad Sohail Khan	Mir Jaffar Khan	Nowshera	Distt: Nowshera Vill: & P/O Khesghi Bala Moheela Durrani	Nowshera	

SNO	Name	Father name	Domicile	address	Services placed at the disposal of EDO (E&SE) for further posting
129	Muhammad Zahid Khan	Sher Zaman	Nowshera	Vill: & P/O Taru Jabba Tehsil Pabbi Distt: Nowshera	Nowshera
130	Nasruninullah	Khan Ullah	Nowshera	Khattak Colony Ashore Abad P/O Ferpzs sons Lab Aman Garh Nowshera	Nowshera
131	Yousaf Shah	Abdur Rahim	Nowshera	Vill: Amankat, P/O Mohib Banda Tehsil, Pabbi, Distt: Nowshera	Nowshera
119 132	Muhammad Ishtiaq	Muhammad Latif	Peshawar	H/No 13 Amin Colony Kohat Road Pesh. C/O Haroon Khan S/o Ahmad Khan	Nowshera
133	Bismillah Jan	Abdul Ghafar	Peshawar	C/O Hira Children Academy Muhammad Zai PO Gulozai Dalazak road Peshawar	Peshawar
98 134	Fahim Jan	Alif Khan	Peshawar	VPO Landi Arbab, Moh: Ghari Malik ahmad Taj Abad near Ring Road Peshawar	Peshawar
126 135	Habibullah	Muhammad Iqbal	Peshawar	H.# 894, Murghuz St. No.04, Afghan Colony Peshawar City	Peshawar
136	Irshad Khan	Khushal Khan	Peshawar	Moh: Mundozai VPO Hazar Khwani Peshawar	Peshawar
137	Khalil ur Rehman	Hastam Khan	Peshawar	Village Shah Alam (Babuzai) PO Nahaqi Distt: & Tehsil Peshawar	Peshawar
138	Muhammad Saleem	Muhammad Azeem Khan	Peshawar	Vill: & P/O Nasar Pur Peshawar	Peshawar
139	S.Sakhawat Shah	S.Chiragh Shah	Peshawar	Vill: Hergoni P/O Wadpaga Tehsil & Distt: Peshawar	Peshawar
140	Waqar Khan	Sifat Ullah	Peshawar	Distt: & Tehsil Peshawar Vill: & P/O Masho Khel Kandi Fateh Khan Khel	Peshawar
141	Zahir Shah	Sardar Khan	Peshawar	Qazi Abad St, No. 9 Tehsil & Distt: Peshawar P/O Pakha Ghulam	Peshawar
142	Zia-ur-Rehman Zia Ullah	Said Rehman Zikria Khan	Peshawar	Vill: Babu Garhi P/O Kaba Biyan Warsak Road Peshawar	Peshawar
143	Inam Ullah	Taj Muhammad	Peshawar	Iujra Dagai, Mohallah Arbab Raza Khan, Tehkal Bala Peshawar	Peshawar
144				VPO Gulozai Tehsil & Distt: Peshawar	Peshawar
145	Abdul Halim	Yamin	Shangla	GCMHS Alpuri Shangla	Shangla
99 146	Aurangzeb	Paidad Khan	Shangla	VPO & Tehsil Alpuri District Shangla	Shangla
147	Saeed Ahmad	Haji Dilber Khan	Shangla	C/O Engr. M. Haneef, H.# 16, St. 7, Ghazi Colony near Gora Qabristan, Peshawar	Shangla
148	Fida Muhammad	Firdous Khan	Swabi	Vill: Dagai Gadoon PO Dewal Gadoon Tehsil & Distt: Swabi	Swabi
88 149	Jamshid Khan	Mehmood Khan	Swabi	VPO Bazar via Tordher Tehsil Lahor distt: Swabi	Swabi
150	Muhammad Abid	Fazli Khaliq	Swabi	Moh: Ayoub Khel VPO & Tehsil Lahor Distt: Swabi	Swabi
151	Muhammad Afsar	Hassan Zeb	Swabi	VPO Islamia Distt: & Tehsil Swabi Moh: Asser Abad	Swabi
152	Muhammad Arif	Muhammad Juwad Khan	Swabi	Moh: Parra VPO Kalu Khan Swabi	Swabi
153	Niaz Wali Khan	Muhammad Yousaf	Swabi	Mohallah Mir Ahmad Khel P/O Saleem Khan Tehsil Distt: Swabi	Swabi
154	Salih Muhammad	Shad Muhammad	Swabi	P/O 1/AR Hussain Distt: Swabi Tehsil lahur Mohalla Kashmir Abad	Swabi
109 155	Sikandar Hayat	Sadiq Ullah	Swabi	Mohallah Jous Khani, P/O Lahor (Sharqi) Tehsil Lahor Distt: Swabi	Swabi
156	Adil Muhammad	Ghani Muhammad	Swabi	Vill: Tail banda, PO Sudher, Tehsil Lahor distt: Swabi	Swabi

SNO	Name	Father name	Domicile	address	Services placed at the disposal of EDO (E&SE) for further posting
177	157 Hafiz Fazl-e-Akbar	Gohar	Swabi	VPO Shewa, Tehsil & Distt: Swabi, Moh: Firdaus Abad	Swabi
133	158 Attaullah Shah	Ubaid Shah	Swabi	VPO Utla (Gadoon) Tehsil Topi, Distt: Swabi	Swabi
159	Farmanullah	Afsar Khan	Swabi	GHS Jalsai, Distt: Swabi	Swabi
160	Muhammad Naeem	Husnul Maab	Swat	Vill. Gogdara Moh: Rahmat Abad P.O Tariq Abad Tehsil & Distt: Swat	Swat
161	Muhammad Saeed	Muhammad Shafiq	Swat	Moh: Rehman Abad, Vill: Qambar PO Rahim Abad, Tehsil Babuzai distt: Swat	Swat
162	Malik Khan	Shahzad Khan	SWA	C/O Ali Zaman ghalla Mandi Opp: Super Masood Coach Service Wazirabad Tehsil & Distt: Tank	Tank
138	163 Suhbat Ullah	Rehmatullah	SWA	H # 44 St-3 Phase-4 Hayatabad Peshawar	Tank
142	164 Iran Gul	Naseer Khan	Tank	VPO Tajori (Gul Imam) Tehsil & Distt: Tank	Tank
116	165 Habib Ullah	Muhammad Aslam	Tank	VPO Tajori, Tehsil & Distt: Tank	Tank
166	Abdul Hafeez	Abdul Rashid	D.I. Khan	H.# 587-1-A, Tabakhi Street, D.I.Khan	D.I. Khan
167	Asmatullah	Atta Ullah	D.I. Khan	Thoya Fazal PO Kachi Painsda Khan Tehsil & Distt: D.I.Khan	D.I. Khan
168	Khalid Naeem	Malik Muhammad Amir	D.I. Khan	VPO Jatta Tehsil Parova, Distt: D.I.Khan	D.I. Khan
169	Mahmood Iqbal	Khairati Khan	D.I. Khan	H.# C/72 Moh: Moavia Nagar Pahar Pur distt: D.I.Khan	D.I. Khan
170	Muhammad Noor Sultan	Dilwar Khan	D.I. Khan	Chah Malik Wala Near Govt: Degree Collage Tehsil pahar pur Distt: D.I Khan	D.I. Khan
171	Muhammad Saleem	Ghulam Sarwar	D.I. Khan	H/No. 1316/A Mohallah Hafiz Jamal Dera Ismail Khan	D.I. Khan
172	Muhammad Zarif	Nawaz Ali	D.I. Khan	Mohalla Moavia Nagar Vill & Tehsil Paharpur Distt: D.I Khan	D.I. Khan
173	Sikandar Irfan	Muhammad Khan	D.I. Khan	Hashim Town near Baran Abad Khiekh yousaf road D.I Khan	D.I. Khan
174	Zamir Ahmad	Ahmad Nawab Khan	D.I. Khan	Isman-e- Ghani Town Inside Eid-Gah (Kalan) D.I Khan	D.I. Khan

Terms and conditions:-

1. Their services will be considered regular but without Pension & Gratuity in terms of Section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. They will however be entitled to Contributory Provident Fund in such a manner and at such rates as per prescribed by the Govt.
2. In case, he is already in Govt: service and working against pensionable post on regular basis before 1st day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public Service Commission through proper channel and selection by the Commission, is appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to his under his previous terms of appointment or to avail the benefit of Contributory Provident Fund allowed to his under new appointment.

- 28
3. Their services are liable to termination on one month's notice from either side. In case of resignation without notice their one-month pay/allowances shall be forfeited to the Government.
 4. They should join their posts within 30 days of the issuance of this notification. In case of failure to join their posts within one month of the issuance of this notification, their appointment will expire automatically and no subsequent appeal etc shall be entertained.
 5. They would be on probation for a period of one year extendable for another one year.
 6. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
 7. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded against under the NWFP Removal from service (Special powers) Ordinance, 2001 and the rules framed from time to time.
 8. Charge report should be submitted to all concerned.
 9. The EDOs concerned would furnish a certificate to the effect that the candidate have joined the post or otherwise after one month of the issue of their posting orders.
 10. Their seniority will be maintained as determined by the Khyber Pakhtunkhwa Public Service Commission.
 11. No DA will be allowed to the appointees for joining their duties.

(Siyeda Sarwat Jehan)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Endst: No. 584-830/ File No.1/ADO(M)/M.C Dated Peshawar the 05/05/2011.

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Director of Education (FATA) Warsak Road Peshawar.
3. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
4. All Executive District Officers (E&SE) in Khyber Pakhtunkhwa with the instructions to allot the already working ADOs against the available vacancies of the Teaching Cadre.
5. Agency Education Officers concerned.
6. District Accounts Officers / Agency Account Officers concerned.
7. The Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
8. The Director E&SE Khyber Pakhtunkhwa, Peshawar.
9. All Officers concerned.

5/5/2011
Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

29

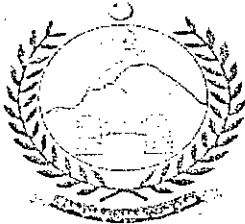
Final S/List

94

Directorate of Elementary and Secondary Education
 Khyber Pakhtunkhwa Peshawar
 PH No. 091-9225338, 9225339,
 Fax 091-9225339

F

Amir



NOTIFICATION.

In exercise of powers conferred under Sub Section (I) of Section-8 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No.XVIII of 1973) the Final Seniority List of ASDEOs/ADEOs Male (Management Cadre) , BPS-16 of Elementary & Secondary Education Department is hereby notified for information of all concerned.

Director
 Elementary and Secondary Education
 Khyber Pakhtunkhwa Peshawar

Endst: No. ~~365~~ ~~3659~~ ~~3659-90~~ File No. 1/ADEO (M) Management Cadre Seniority List/2018

Dated Peshawar the 17/8 /2018.

Copy forwarded to the: -

1. Director Curriculum & Teacher Education Khyber Pakhtunkhwa, Abbottabad .
2. Director Education FATA Khyber Pakhtunkhwa, Peshawar
3. Director PITE Khyber Pakhtunkhwa, Peshawar
4. All District Education Officers (M) in Khyber Pakhtunkhwa
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
6. P/A to Director E&SE Department Khyber Pakhtunkhwa.
7. The Deputy Director(EMISE), E&SE Department, with the request to upload the requisite Seniority List of E&SE Department website (www.kpese.gov.pk).
8. Master File

Dy: Director (Estab)
 Elementary and Secondary Education
 Khyber Pakhtunkhwa Peshawar

15/8/18

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.
FINAL SENIORITY LIST OF ADEOs, ASDEOs (BPS-16) REGULAR MANAGEMENT CADRE MALE IN ELEMENTARY
& SECONDARY EDUCATION KHYBER PAKHTUNKHWA, CORRECTED UPTO 15-08-2018

S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing: B. Ed	Date of birth	Domicile	Date of Ist: Apptt: in Education Department	Date of Apptt: on ADEO post	Remarks
1	Ghulam Habib	Muhammad Wali	M.Sc B.Ed.M.Phil	DEO Shangla	1997	6.5.1967	M.Agency	12.7.1989	5.20.2011	
2	Mehboob Ellahi	Rahmat Elahi	M.A M.Ed	DEO Chitral	1999	3.15.1970	Chitral	4.10.1995	5.5.2011	
3	Muhammad Farooq	Gul Rehman		DEO Karak		2.3.1976	Karak		5.5.2011	
4	Abdul Qayum khan	Haji Lal Khan	M.Sc M.Ed	DEO Abbottabad	1998	4.8.1970	A.Abad	11.1.1995	5.5.2011	
5	Muhammad Zahid Khan	Sher Zaman	M.Sc M.Ed	DEO Nowshera	1998	11.22.1973	Nowshera	6.23.1997	5.5.2011	
6	Shamsul Islam Niaz	Niaz Muhammad	M.A B.Ed	DEO Charsadda	2000	1.1.1978	Charsadda	01.11.2010	5.5.2011	
7	Sharafat Khan	Muhamad Aslam Khan	M.A M.Ed	DEO Abbottabad	1997	5.10.1970	A.Abad		5.5.2011	
8	Mahmood Iqbal	Khairati Khan	MBA M.Ed	DEO(M) D.I Khan	2000	12.1.1967	DI Khan	1.17.1998	5.5.2011	
9	Muhammad Irshad	Niaz Farid	M.A B.Ed	DEO Bannu	1999	4.16.1976	FR.Bannu	1.31.2002	5.5.2011	
10	Muhammad Anwar	Hazrat Umar	M.A M.Ed	DEO Mardan	2002	3.1.1973	Mardan	6.24.1997	5.5.2011	
11	Zia ullah	Zikriya Khan	M.Sc M.Ed	DEO Peshawar	1994	3.19.1970	Peshawar	5.28.1994	5.5.2011	
12	Muhammad Ishfaq Khan	Muhammad Hussain Khan	M.A M.Ed	DEO Abbottabad	1993	5.6.1968	A.Abad	12.13.1990	5.5.2011	
13	Shams Ur Rehman	Malik ur Rehman	M.A Edu	DEO Manshra	1999	11.15.1974	Manshra	1.20.1996	5.5.2011	
14	Iftikhar Ahmad	Mumtaz ahmad	M.A M.Ed	DEO Haripur	1999	12.25.1969	A.Abad	5.8.1993	5.5.2011	
15	Ghulam Sarwar	Ghulam yahya	M.A M.Phil	DEO MKD	1996	5.21.1972	MKD	2.11.1993	5.5.2011	
16	Muhammad Zubair	Sabz Ali Shah	M.A B.Ed	DEO Charadda	2001	7.19.1972	Charsada	1.22.1998	5.5.2011	
17	Fazli Khuda	Waris Khan	M.A M.Ed	DEO Mardan	2002	1.6.1976	Mardan	3.24.2003	5.5.2011	
18	Muhammad Rehman Shah	Gul Rehman Shah	M.A M.Ed	DEO Bannu	2002	2.23.1976	Bannu		5.5.2011	
19	Muhammad Sohaib Khan	Mir Jafar Khan	M.A M.Ed	DEO Nowshera		3.22.1971	Nowshera	10.31.1996	5.5.2011	
20	Muhammad Naseem	Husnul Maab	M.A M.Ed	DEO Swat	2001	4.10.1975	Swat		5.5.2011	
21	Ali Haidar	Bahdar Khan	M.Sc M.Ed	DEO Dir(L)	1991	1.5.1962	Dir	11.19.1986	5.5.2011	

30

15/8/18

SP

No.	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of Ist: Apptt: in Education Department	Date of Apptt: on ADEO post	Remarks
22	Muhammad Raza Shah	Muhammad .Hanif	M.A M.Ed	DEO Dir (L)	1991	12.18.1963	Dir	5.11.1983	5.5.2011	
23	Muhammad Islam	Fatihul Mulk khan	M.A M.Ed	DEO Dir(L)	2001	4.10.1973	Dir	12.20.1994	5.5.2011	
24	Dil Nawaz Khan	Dashat Mir	M.Sc M.Ed	DEO Karak	2001	1.3.1977	Karak	8.1.2006	5.5.2011	
25	Fida Muhammad	Firdoos khan	M.A M.Ed	P.O E&SE	2001	4.15.1977	Swabi	4.20.1999	5.5.2011	
26	Muhammad Afiab	Masal khan	M.S (Edu)	DEO Nowshera	2004	4.14.1978	Nowshera	6.23.1997	5.5.2011	
27	Hayat khan	Nazeef khan	M.Sc.M.Ed	DEO Peshawar	2004	2.15.1979	Charsada	5.17.2011	5.23.2011	
28	Muhammad Ajmal	Jamalud Din	M.A M.A Edu	DEO Manshara	1999	1.2.1969	Manshara	2.28.1993	5.5.2011	
29	Salih Muhammad	Shad Muhammad	M.A M.Ed	DEO Nowshera	1995	1.1.1967	Swabi	12.9.1989	5.5.2011	
30	Waheed Ullah Shah	Mazhar Ali Shah	M.A B.Ed	DEO Bannu	1994	1.16.1968	Bannu	3.31.1992	5.5.2011	
31	Khalid Naseem	Malik Muhammad Amir	M.Sc B.Ed	DEO DI Khan	2002	2.28.1976	DI Khan	4.21.1999	5.5.2011	
32	Gul Faraz	Shahid Khan	M.A M.Ed	DEO Karak	1999	3.5.1970	Karak	10.8.1990	5.5.2011	
33	Abudur Rehman Rashid	Inayat Ullah jan	M.Sc M.Ed	DEO Laki Marwat	1993	1.11.1971	L.Marwat	8.3.1999	5.5.2011	
34	Abdul wahab	Abdul Ghafoor	MA.M.Ed	DEO Swabi	1998	3.6.1971	Swabi	12.31.1993	5.5.2011	
35	Imtiaz khan	Taj Barin	M.Phil B.Ed	DEO Nowshera	1996	2.8.1973	Nowshera	5.30.1995	5.5.2011	
36	Hameed Ullah	Khan Zaman	M.A B.Ed	DEO L.Marwat	2003	4.12.1974	L.Marwat	9.1.2004	5.5.2011	
37	Muhammad Abid	Fazli Khaliq	M.A M.Ed	DEO Swabi	2002	11.1.1974	Swabi	4.24.1998	5.5.2011	
38	Muhammad Azam	Badashah Islam	M.Sc M.Ed	DEO Swat	2001	12.27.1974	MKD		5.10.2011	
39	Raees Kahn	Johar Gul	M.A M.Ed	DEO Khoistan	2000	9.6.1976	Khy: Agency:	9.21.1998	5.23.2011	
40	Adil Muhammad	Ghani Muhammad	M.Sc M.Ed	DEO Mardan	2004	4.3.1979	Swabi	5.7.2011	5.5.2011	
41	Shah Jehan khan	H.Aslam khan	M.Sc M.Ed	Assistant Director	2004	4.15.1979	Peshawar	5.5.2011	5.5.2011	
42	Love Dan	Amin Jan	M.A B.Ed	DEO Dir(U)	1997	4.2.1972	Baj Agy:	4.19.1995	5.10.2011	
43	Amir Badashah	Tamash Gul		DEO Mardan		4.15.1973	Mardan	5.5.2011	5.5.2011	
44	Muhammad Hamayun	Salam Gul	M.A M.Ed	DEO Karak	2003	2.2.1973	Karak	10.12.1995	5.5.2011	
45	Niaz Wali Khan	Muhammad Yousaf	M.A M.Ed	DEO Swabi	1997	3.5.1971	Swabi	9.21.1997	5.5.2011	

Wan
15/8/18

[Handwritten signature]

Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of Ist: Apptt: in Education Department	Date of Apptt: on ADEO post	Remarks
46 Muhammad Saleem	Abdul Halim	MA.M.Ed	DEO Nowshera	2001	4.25.1972	Nowshera	12.7.1992	5.5.2011	
47 Shafiq Ur Rehman	Abdur Rehman	M.A M.Phil (Edu)	DEO Mansehra	1999	4.12.1973	Mansehra	1.31.1995	5.5.2011	
48 Ahmad Ullah	Nasrullah	MA.M.Ed	DEO Charsadda	2000	8.17.1974	Charsada	7.13.1997	5.5.2011	
49 Raees Ur Rehman	Noor Ur Rehman	M.A M.Ed	DEO Mansehra	1999	2.13.1966	Mansehra	3.15.1986	5.5.2011	
50 Muhammad Zarif	Navaz Ali	M.Sc M.Ed	DEO DI Khan	1994	7.25.1969	DI Khan	5.26.1997	5.5.2011	
51 Muhammad Tariq	Noor Ali Khan	M.A M.Phil	DEO Bannu	1998	3.28.1971	Bannu	5.5.1999	5.5.2011	
52 Hamid Rasool	Abdur Rasool	M.A M.Ed		1997	6.2.1974	Bannu	9.1.2006	5.5.2011	
53 Qadir Shah	Sahib Khan	M.A M.Ed	DEO L.Marwat	2000	1.3.1974	L.Marwat	5.10.2005	5.10.2011	
54 Muhammad Arshad	Wadood Ur Rehman	M.A B.Ed	DEO Charsadda	2000	22.01.1974	Peshawar	8.16.1997	5.10.2011	
55 Irshad Khan	Khushal khan	M.A M.Ed	PITE	2003	3.14.1974	Peshawar	5.15.1999	5.5.2011	
56 Syed Attullah shah	S.lyed Muzarab shah	M.Sc M.Ed	AD Directorate	2001	2.1.1976	Mohd Ay:		5.10.2011	
57 Shahzad Nadeem	Khursheed Ahmad	M.A M.Ed	DEO Chitral	2002	2.1.1977	Chitral	5.5.2011	5.5.2011	
58 Habib Ur Rehman	Badashah Khan	M.A M.Ed	DEO L.Marwat	1993	9.5.1964	L.Marwat	12.16.1990	5.5.2011	
59 Abdul Samad	Muhammad Miskeen	M.A M.Ed	DEO Haripur	1998	1.1.1970	Mansehra	12.19.1990	5.10.2011	
60 Chanzeb	Zardad Khan		DEO Abbottabad		5.25.1972	Abbott Abad	5.5.2011	5.5.2011	
61 Raja Babu Jahangir	Raja Sultan Mubarak	M.A B.Ed	DEO Mansehra	1999	4.1.1973	Mansehra	5.5.2011	5.5.2011	
62 Qaisar Khan	Muhammad Nawaz Khan	M.A M.Ed	DEO Karak	2000	4.16.1974	FR. Bannu	4.20.1999	5.10.2011	
63 Sharaf Uddin	Gul Nadar Khan	M.A B.Ed	DEO Chitral	1994	2.20.1968	Chitral	3.1.1991	5.5.2011	
64 Imtiaz khan	Gul Zaman khan	M.A M.Ed	DEO Dir(L)	1992	4.8.1968	Dir	5.16.1987	5.5.2011	
65 Muhammad Kihtab	Gulab	M.A M.Ed	DEO Dir(L)	1994	1.1.1969	Dir	12.10.1990	5.5.2011	
66 Bakhat Zada	Mahan Gul	M.A M.Ed	DEO Dir(L)	1995	4.10.1970	Dir	4.25.1992	5.5.2011	
67 Zia ur Rehman	Said Rehman	M.A M.Ed	DEO Peshawar	1996	7.15.1972	Peshawar	1.1.1994	5.5.2011	
68 Ihtisham ul Haq	Fazal Haq	M.Phil(Edu)	DEO MKD	2000	1.1.1973	MKD	05.04.1999	5.5.2011	
69 Muhammad Saleem	Ghulam Sarwar	M.A M.Ed	DEO DI Khan	1993	4.18.1970	DI Khan	12.31.1997	5.5.2011	

32

Kan
15/8/15

[Handwritten signature]

#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of Ist: Apptt: in Education Department	Date of Apptt: on ADEO post	Remarks
70	Sikandar Irfan	Faiz Ullah Khan	M.Sc M.Ed	DEO DI Khan	1998	9.11.1972	DI Khan	1.13.1996	5.5.2011	
71	Abdul Hafiz	Abdur Rashid	M.Sc M.Ed	DEO DI Khan	1996	3.8.1974	DI Khan	3.1.1993	5.5.2011	
72	Ishtiaq Ahmad Khan	M.uhammad kram khan	M.A M.Ed	DEO Abbottabad	2002	5.14.1968	A.Abad	6.11.1987	5.5.2011	
73	Mati Ullah khan	Darwaiz khan	M.A M.Ed	DEO DI Khan	2001	4.3.1978	FR.Bannu	5.5.2011	5.12.2011	
74	Shahbir Ahmad	Fazle Hanan	M.A M.Ed	DEO Charsadda	2001	4.30.1973	Charsada	2.23.1998	5.5.2011	
75	Jamsheed Khan	Mehmood khan	M.A M.Ed	DEO Swabi	2002	1.1.1977	Swabi	1.11.2000	5.5.2011	
76	Riaz khan	Mir Zale khan	M.A M.Ed	DEO Bannu	2000	3.8.1972	Bannu	4.23.1996	5.24.2011	
77	Rajab Ali	Mir Qadam khan	M.A M.Ed	DEO Bannu	2000	4.15.1970	SW Agy:	10.31.1994	5.10.2011	
78	Muhammad Tahir	Habib Jan	B.Sc M.Ed	DEO Dir(L)	1997	5.14.1972	Dir	8.31.1994	5.5.2011	
79	Farman Ullah	Aman Ullah	M.a M.Ed	DEO Peshawar	2000	1.1.1975	Peshawar		5.5.2011	
80	Syed Ikram	Syed Mutamed Khan	M.A M.Ed	DEO Mardan	2002	3.15.1975	Mardan	6.24.1997	5.5.2011	
81	Muhammad Azam Khan	Gul khan	M.A B.Ed	DEO Bannu	2002	7.18.1977	FR.Bannu		5.10.2011	
82	Hameed Ur Rehman	Saeed Ur Rehman	M.A M.Phil (Edu)	Assistant Director	2000	4.4.1978	Peshawar	11.7.2005	5.10.2011	
83	Saeed Mehmood	Hazrat Mehmood	M.A M.Ed	DEO Buner	1995	1.7.1967	Bunir	6.1.1996	5.5.2011	
84	Fazle Qadir	Ali Asghar	M.A M.Ed	DEO Haripur	1995	4.10.1967	Haripur	9.17.1986	5.10.2011	
85	Faheem Jan	Alif Khan		DEO Peshawar		3.15.1969	Peshawar	5.5.2011	5.5.2011	
86	Aurag Zeb	Paidad khan	M.A M.Ed	DEO Shangla	1998	4.10.1969	Shangla	5.5.2011	5.5.2011	
87	Asad Ullah Shah	Nawab Ali Shah	M.A M.Ed	DEO Bannu	1994	4.7.1969	Bannu	9.1.1994	5.5.2011	
88	Farman Ullah	Afsar Khan	MA.M.Ed	DEO Swabi	1998	2.2.1971	Swabi	9.1.1992	5.5.2011	
89	Abdul Waheed	Abdul Qadir	M.A M.Ed	DEO Abbottabad	1999	3.14.1971	Abbott Abad	5.5.2011	5.5.2011	
90	Altaf Hussain	Nasrullah Khan	M.Phill M.Ed	DEO MKD	1999	4.7.1971	MKD	4.13.1996	5.5.2011	
91	Muhammad Alamdin	Muhammad Iqbal Din	M.A B.Ed	DEO Bannu	1995	4.5.1971	FR. Bannu	5.26.1999	5.5.2011	
92	Saleh Badashah	Lal Badashah	M.Sc M.Ed	DEO L.Marwat	1998	9.1.1971	L. Marwat	4.23.1996	5.5.2011	
93	Akber Ghani	Fateh Muhammad	M.A M.Ed	DEO Dir(L)	1998	5.7.1972	Dir	3.17.1992	5.5.2011	

Handwritten signature and date: 15/10/18

Handwritten number: 33

S. #	Name & Designation	Father's name	Qualification	Place of posting	Year of posting	Date of birth	Domicile	Date of Ist: Apptt: in Education Department	Date of Apptt: on ADEO post	Remarks
94	Muhammad Azeem Khan	Nawab Khan	M.A M.Ed	Assistant Director	1999	3.3.1973	NW Agy:	16.06.2004	5.12.2011	
95	Sikandar Hayat	Sadiq ullah	MA.M.Ed	DEO Swabi	1999	11.20.1973	Swabi	9.1.1992	5.5.2011	
96	Muhammad Noor Sultan	Dilawar Khan	M.A M.Ed	DEO DI Khan	2000	2.22.1976	DI Khan	4.21.1999	5.5.2011	
97	Wisal Muhammad	Dost Muhammad	MSc.M.Ed	DEO Charsadda	2001	8.11.1979	Charsada	5.10.2011	5.10.2011	
98	Nisar Ahmad	Painda Gul	M.A M.Ed	DEO Mardan	1991	4.1.1964	Baj Agy:	10.15.1992	5.10.2011	
99	Muhammad Iqbal	Baz Mulla	M.A M.Ed	DEO Dir	1991	11.20.1964	Dir	5.5.2011	5.5.2011	
100	Zahcerud Din	Muhammad Saeed	M.Sc M.Ed	DEO Dir(L)	1991	3.2.1965	Dir	7.12.1999	5.5.2011	
101	Habib Ullah	Muhammad Aslam	M.A B.Ed	DEO Tank	1996	2.2.1974	Tank	4.1.1993	5.5.2011	
102	Hafiz Fazl e Akber	Gohar	M.A M.Ed	DEO Swabi	2002	4.5.1978	Swabi	1.21.1997	5.5.2011	
103	Mir Samad Khan	Hakeem Khan	M.A M.Ed	DEO Battagram	2002	5.12.1971	Batgram	11.22.1999	5.5.2011	
104	Muhammad Ishtiaq	Muhammad Latif	M.A M.Ed	DEO Peshwar	2004	9.29.1975	Peshawar	5.6.1996	5.5.2011	
105	Muhammad Naem	Mumtaz Khan		DEO Karak		5.25.1976	Karak		5.5.2011	
106	Syed Anwar Ali Shah	Syed Mehmood Shah	M.A M.Ed	DEO Charsadda	2002	11.20.1971	Mohd Agy	5.13.2011	5.23.2011	
107	Muhammad Sharif	Sher khan	M.A M.Ed	DEO Hangu	1998	3.1.1970	Kuram	12.3.1994	5.10.2011	
108	Abdul Qayum khan	Abdul Hanan	M.Sc B.Ed	Assistant Director	2000	3.16.1971	Bannu	11.7.2005	5.23.2011	
109	Ihsan ullah	Amar sher	M.A M.Ed	DEO Mansehra	1997	8.14.1971	Mohd Agy:	1.17.1995	5.10.2011	
110	Habib Ullah	Muhammad Iqbal		DEO Peshawar		12.10.1973	Peshawar		5.5.2011	
111	Muhammad Hayat Khan	Masal khan	M.S (Edu)	DEO Nowshera	2000	4.14.1975	Nowshera	6.23.1997	5.5.2011	
112	Sultan Muhammad Khan	Ali Akber	M.A M.Ed	DEO Mardan	2004	4.1.1978	Mardan	4.29.1999	5.5.2011	
113	Muhammad Ishaq	Muhammad	M.A M.Ed	DEO MKD	2001	6.23.1978	MKD	10.27.1994	5.5.2011	
114	Fayaz uddin	Jehan Badashah	M.A M.Ed	DEO Dir (U)	2004	3.14.1979	Dir	5.5.2011	5.5.2011	
115	Muhammad Hussain	Mir Abas Khan	M.A B.Ed	DEO Karak	1996	4.14.1973	Karak	5.5.2011	5.5.2011	
116	Muhammad Asif Khan	Muhammad Akram Khan	M.A M.Ed	DEO Abbottabad	1996	10.5.1964	Abbott Abad	5.5.2011	5.5.2011	
117	Atta Ullah Shah	Ubaid Shah	M.A (Edu)	Assistant Director	1991	3.6.1965	Swabi	9.4.1986	5.5.2011	

Wahid
15/8/18

PK

S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of posting W.F.O	Date of birth	Domicile	Date of Ist: Apptt: in Education Department	Date of Apptt: on ADEO post	Remarks
118	Said Zamin Shah	Aqalmin Shah	M.A B.Ed	DEO MKD	1994	3.8.1965	MKD	10.10.1986	5.5.2011	
119	Umar Farooq	Bahramand	M.A B.Ed	DEO Buner	1994	6.18.1966	Bunir	2.8.1990	5.5.2011	
120	Syed Ihsan ullah Shah	Syed Lal Badashah	M.A M.Phil	DEO Peshawar	1996	5.1.1966	Peshawar	11.10.1994	5.5.2011	
121	Imtiaz Ali	Haji Hayat Gul	M.A B.Ed	Assistant Director		10.12.1966	Peshawar		5.5.2011	
122	Iftekhar Ali khan	Zarif khan	M.A M.Ed	DEO Mardan	1996	3.4.1968	Mardan	3.3.1992	5.5.2011	
123	Pir Muhammad khan	Nadir khan	M.A M.Ed	DEO Dir (U)	1996	5.9.1968	Dir	5.19.1987	5.5.2011	
124	Sakin Shah	Muhib Ali Shah	M.A M.Ed	GHS Urmar	1998	10.4.1969	Peshawar	3.17.1992	5.5.2011	
125	Iran Gul	Naseer Khan	M.Sc M.Ed	DEO Tank	1997	4.2.1970	Tank	4.6.1999	5.5.2011	
126	Mushtaq Ahmad	Gulzar Ahmad		DEO Kohat		12.20.1970	Peshawar		5.5.2011	
127	Inam ullah	Taj Muhammad	M.A M.Ed	DEO Peshawar	1998	1.21.1971	Peshawar	4.19.1994	5.5.2011	
128	Tahir Ahmad	Rab Nawaz Khan	M.Sc M.Ed	DEO L.Marwat	1999	1.4.1974	L.Mrwat	2.21.1998	5.5.2011	
129	Zahir Qamar	Shamsul qamar	M.Sc B.Ed	DEO Mardan	1999	2.3.1975	Peshawar		5.5.2011	
130	Ajeeb ullah	Saif ullah	M.A M.Ed	DEO Dir (U)	2000	11.16.1976	Dir	5.5.2011	5.5.2011	
131	Wali ur Rehman	Fojun khan	M.A M.Ed	DEO Battagram	2000	1.4.1977	Batgram	5.5.2011	5.5.2011	
132	S.Irshad Ali	Ali Afsar	M.A M.Ed	DEO Abbottabad	2000	5.9.1977	A.Abad	4.11.1996	5.5.2011	
133	Said Badashah	Ali Ahmad	M.A M.Ed	DEO Haripur	1991	3.1.1965	Swabi	11.26.1986	5.5.2011	
134	Hafiq M.uhammad Ziaullah	Ajab gul	M.A M.Ed	DEO Kohat	1995	1.1.1967	Kohat	12.4.1985	5.5.2011	
135	Abdul Halim	Yamin	M.A M.Ed	DEO Shangla	1998	4.6.1968	Shangla	11.10.1994	5.5.2011	
136	Syed Anwar Shah	Syed Mardan shah	M.A M.Phil	DEO Manshra	1995	3.19.1969	Manshra	3.26.1990	5.5.2011	
137	Rooh Ullah Jan	Misbahuddin	M.A M.Ed	DEO Mardan	1995	1.5.1970	Mardan	3.24.1992	5.5.2011	
138	Asmat ullah	Atta Muhammad	M.A M.Ed	DEO DI Khan	1994	9.1.1970	D I Khan	11.19.1992	5.5.2011	
139	Nasrumin ullah	Khan ullah	M.A M.Ed	GHS Amangar	1994	12.12.1970	Nowshera	12.10.1990	5.5.2011	
140	Abdullah Kahn	Zargohan shah	MA.M.Ed	DEO Karak	1994	2.12.1971	Karak	11.19.1994	5.5.2011	
141	Arshad Mehmood	Ghulam Nabi	M.A M.Ed	DEO Haripur	1997	12.24.1971	A.Abad	3.10.1993	5.5.2011	

W.F.O
15/8/18

S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of posting B.T.O	Date of birth	Domicile	Date of Ist: Apptt: in Education Department	Date of Apptt: on ADEO post	Remarks
142	Muhjammad Irfan	Mian fazle dayan	M.A B.Ed	DEO Nowshera	1998	10.01.1972	Nowshera	12.9.1999	5.5.2011	
143	Wazir Zada	Sahib zada	MA.M.Ed	DEO Mardan	1996	4.15.1972	Mardan	2.27.1992	5.5.2011	
144	Munibur Rehman	Abdul ghafoor	M.A M.Ed	DEO Abbottabad	1998	9.10.1973	Abbot Abad	3.23.1992	5.5.2011	
145	Sajjad Rasheed	Abdur Rasheed	M.A M.Ed	DEO Peshawar		8.8.1970	Peshawar	5.7.1996	5.10.2011	
146	Noor Ajab khan	Noor Muhammad khan	M.A B.Ed	DEO Karak	2001	6.4.1972	Karak		5.5.2011	
147	Bismillah Jan	Abdul ghafar	M.Sc M.Ed	DEO Peshawar	2000	4.27.1974	Peshawar	7.1.1997	5.5.2011	
148	Muhammad Sadiq	Muhammad kamal	MSc.M.Ed	DEO Mardan	2002	4.6.1974	Mardan	7.16.1997	5.5.2011	
149	Hashim khan	Muhammad Nawaz Khan	M.A B.Ed	DEO L.Marwat	2001	1.15.1975	L Marwat	5.10.2011	5.10.2011	
150	Muhammad Ishfaq Elahi	Farman Elahi		DEO Battagram		11.10.1976	Peshawar		5.23.2011	
151	Sajjad Ahmad	Qazi fazle Hanan	M.Sc M.Ed	DEO Charsadda	2001	4.3.1977	Charsada	3.10.2007	5.10.2011	
152	Khalil Ur Rehman	Hastam khan	M.A M.Ed	GMS Jati Bala	1998	4.14.1966	Peshawar	10.17.1988	5.5.2011	
153	Wajid Ud Din	Fazal Mabood Jan	M.A M.Ed	DEO Dir (L)	1998	24.11.1967	Dir	8.29.1994	5.5.2011	
154	Haya Said	Mian said	M.A M.Ed	DEO MKD	2001	6/24/1905	MKD	15.02.1990	5.5.2011	
155	Sir Mast khan	Mir Rehman	M.A M.Ed	PITE	1998	2.1.1969	Mohd Agy:	12.7.1989	5.23.2011	
156	Aman ul Mulk Shah	Said Ali Shah	M.A M.Ed	DEO Buner	1999	1.25.1969	Bunir	5.31.1994	5.5.2011	
157	Muhammad Tahir	Sawal Faqir	M.A M.Ed	DEO Dir(U)	1998	8.18.1969	Dir	16.08.1887	5.13.2011	
158	S.Sakhawat Ali shah	S.Chirgah shah	M.A B.Ed	DEO Peshawar	1998	5.15.1970	Peshawar	10.16.1988	5.5.2011	
159	Nasrullah khan	Nadar khan	M.A B.Ed	DEO Dir(L)	2000	1.1.1971	Dir		5.5.2011	
160	Janas khan	Lal Rahim	MSc.M.Ed	DEO Charsadda	2001	2.2.1971	Charsada	1.14.1998	5.5.2011	
161	Zahir ur Rehman	Mir hussain	M.Sc M.Ed	DEO Hangu	2000	2.6.1973	Hangu	12.16.1999	5.5.2011	
162	Noor Muhammad	Said Muhammad	M.A B.Ed	DEO Dir (L)	2000	1.2.1975	Baj Agy:		5.10.2011	
163	Mukhtiar khan	Ismail khan	MSc.B.Ed	DEO Mardan	1999	1.7.1972	Mardan	4.11.1996	5.5.2011	
164	Shafiq ur Rehman	Zia ul haq	M.B.A M.Ed	DEO Abbottabad	2002	5.25.1972	Abbot Abad		5.5.2011	
165	Zakir Hussain	Hussain Gul	M.A B.Ed	DEO MKD	2001	1.16.1973	MKD	23.04.1998	5.5.2011	

low
15/8/18

S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of 1st Apptt: in Education Department	Date of Apptt: on ADEO post	Remarks
166	Yousaf Shah	Abdur Rahim	M.S (Edu)	DEO Nowshera	1999	3.27.1973	Nowshera	5.28.1995	5.5.2011	
167	Zahir Shah Khan	Sardar Khan	MSc.M.Ed	DEO Peshawar	2000	4.3.1973	Peshawar	9.25.1993	5.5.2011	
168	Sajd Ullah	Zahir Shah	M.Sc M.Ed	DEO Charsadda	1999	4.30.1974	Mohd Agy	1.1.2001	5.10.2011	
169	Said Zahid	Faiz Mehmood	M.A M.Ed	DEO Buner	2000	4.1.1975	Bunir	6.20.1993	5.5.2011	
170	Khalid Khan	Khan Bahdar				4.6.1975	Mardan			
171	Kiramata ullah	Sattar zZman	M.A B.Ed	DEO Karak	1999	4.12.1975	FR.Bannu		5.23.2011	
172	Muhammad Afsar	Hassan Zeb	M.A M.Ed	DEO Swabi	2002	1.5.1976	Swabi	4.20.1999	5.5.2011	
173	Hamood ur Rehman	Maqbool ur Rehman	MA.M.Ed	Assistant Director	2001	5.15.1977	Peshawar	5.5.2009	5.5.2011	
174	Taj Alam	Sher Alam	M.Sc B.Ed	DEO DI Khan	2002	11.20.1977	FR.Bannu		5.23.2011	
175	Abdul Karim	Jehinger Khan	M.A M.Ed	DEO Peshawar	2003	6.16.1981	Peshawar	2.23.2007	5.10.2011	
176	Miftah uddin	Akber khan	M.A M.Ed	DEO Chitral	1993	10.17.1961	Chitral	12.29.1984	5.5.2011	
177	Abid Hussain	Hussain Ghulam	M.Sc B.Ed	DEO Kohat	1998	6.16.1968	Kurram	10.10.1995	5.5.2011	
178	Ejaz Ahmad	Ghulam Mohi Ud Din	MA B.Ed	DEO (M) Peshawar		1.4.1970	Peshawar		7.8.1905	
179	Muhammad Ishtiaq	Muhammad Ayub	M.Phil (Edu)	DEO Manshra	1994	2.15.1970	Manshra	12.15.1990	5.5.2011	
180	Muhammad Arif	Muhammad Junaid khan	M.Sc M.Ed	DEO Swabi	1997	4.14.1971	Swabi	9.19.1995	5.5.2011	
181	Zamir Ahmad khan	Ahmad Nawaz Khan	M.Sc M.Ed	DEO DI Khan	1995	4.12.1973	DI Khan	2.15.1996	5.5.2011	
182	Shakeel Ahmad	Muhammad Ahmad	M.Sc M.Ed	DEO DI Khan	2000	5.16.1973	DI Khan	1.14.1998	5.10.2011	
183	Muhammad .Saleem	Muhammad Azeem Khan	M.A M.Phil (Edu)		1996	1.6.1974	Peshawar	5.19.1994	5.5.2011	
184	Zafar khan	Munawar Khan		DEO Abbottabad		12.25.1974	Abbot Abad		5.5.2011	
185	Jehingeer Khan	Shah Jehan	M.A M.Phil (Edu)	DEO Charsadda	1999	4.15.1975	Peshawar	2.19.1998	5.5.2011	
186	Nisar Muhammad	Bahdar Khan	M.A M.Ed	DEO L.Marwat	1999	11.19.1975	L Marwat	5.15.2002	10.205.2011	
187	Zafar Iqbal	Amir Badashah				12.10.1975	Peshawar			
188	Khamsul Haq	Mian Habib Jan	MA B.Ed	DEO (M) Peshawar						
189	Waseem Fazal	Fazlu Rehman	M.B.A M.Ed	DEO Abbottabad	1994	6.20.1967	A.Abad	10.1.1985	5.13.2011	

W
10/10/18
CS

led
Cur
Edu
TTE
Ed

	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of Ist: Apptt: in Education Department	Date of Apptt: on ADEO post	Remarks
190	Tahir Shah	Qadar shah	MA.M.Ed	DEO Battagram	1993	9.1.1968	Mardan	12.1.1987	5.13.2011	
191	Abdul Waheed	Abdul Ghani	MA B.Ed			1.9.1969	Karak			
192	Raees Khan	Sher Zaman Khan	M.A M.Ed	DEO MKD	1997	08.05.1972	MKD	18.08.1993	5.5.2011	
193	Shams ur Rehman	Hafiz Abdul hadi	M.A M.Ed	DEO Battagram	1994	3.13.1967	Hangu	2.3.1990	5.27.2011	
194	Syed Fazali Amin	Mir Hatim Shah	M.A M.Ed	DEO Charsadda	1997	3.11.1971	Charsada	01.04.1996	5.5.2011	
195	Sahib Kamal	Haji Fazal Zaman	M.A M.Phil (Edu)	DEO Nowshera	2000	5.11.1972	Nowshera	3.22.1992	5.23.2011	
196	Saeed Ahmad	H.Deiber Khan	M.Sc M.Ed	DEO Shangla	2000	10.4.1972	Shangla	1998	5.5.2011	
197	Tariq Ahmad	Fazli Rashid	M.A M.Ed	DEO Shangla	2002	6.10.1973	Dir	5.1.1999	7.23.2011	
198	Muhammad .Arshad Sarif	Sharif Khan	M.A M.Ed	DEO Kohat	2002	7.26.1973	Kohat	4.9.1999	5.13.2011	
199	Ulfat Ali Shah	Daftar Shah	M.A B.Ed	DEO DIKhan	1995	4.1.1974	SW Agy:	1.29.2002	5.13.2011	
200	Qasim Ali Khan	Mumtaz ali khan				1.1.1976	Peshawar			
201	Hidayat ullah	Khan Zada Pacha	M.Sc B.Ed	DEO Dir(L)	1996	6.15.1963	Dir	4.15.1993	5.5.2011	
202	Abdul Khaliq	Sultan Mehmood	M.A M.Ed	DEO Mardan	1996	4.2.1971	Mardan	12.22.1994	5.5.2011	
203	Abdullah Khan	Sadin Khan	M.A M.Ed	DEO Hangu	1998	4.25.1970	Kurram	6.21.1992	5.10.2011	
204	Javaid Iqbal	Ghulam Qadar	M.A M.Ed	DEO Mardan	1999	3.18.1973	Baj Agy	5.2.2011	5.12.2011	
205	Malik Khan	Shehzad Khan	M.A M.Ed	DEO Tank	1996	4.20.1973	SW Agy:	9.24.2003	5.5.2011	
206	Naveed Ahmad	M uhammad Farid Khan	M.A M.Ed	DEO Mansehra	2002	4.5.1974	Mansehra	1.23.1996	5.5.2011	
207	Fazli Subhan	Fazli hanan	M.A M.Ed	DEO MKD	1996	24.02.1965	MKD	15.02.1990	5.5.2011	
208	Sarfaraz Khan	Shahab Ud Don	M.A M.Ed	DEO Mansehra	1992	12.14.1967	-do-	10.11.1994	5.5.2011	
209	Shahab Ud Din	Fazal Manan		DEO Tank		3.12.1970	NW Agy:		5.23.2011	
210	Sana ullah	Muhammad Sher Khan	M.A M.Phil (Edu)	DEO Bannu	2000	3.8.1974	FR.Bannu	10.6.1994	5.10.2011	
211	Nadeem	Abdul Qayum	M.A M.Phil (Edu)	DEO Mansehra	2004	1.1.1974	Mansehra	2.3.2007	5.5.2011	
212	Ghulam Jilani	Darvaish	M.A M.Ed	DEO Mansehra	1998	10.29.1965	-do-	30.06.1985	5.5.2011	

15/8/18

S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of Ist. Apptt: in Education Department	Date of Apptt: on ADEO post	Remarks
213	Syed Mehmood ul Hassan	Syed Sarwar Shah	M.A B.Ed	DEO Abbottabad		20.3.1970	Abbot Abad	5.5.2011	5.5.2011	
214	Rab Nawaz	Gul Dad Khan		DEO Abbottabad		4.15.1973	Abbot Abad		5.5.2011	
215	Jehanzeb Ali	Fariq Khan	M.A M.Ed	DEO Charsadda	2000	4.16.1974	Mohd Agy:	05.12.2011	5.12.2011	
216	Sange Faras	Malook	M.Sc M.Ed	DEO Charsadda	2001	4.12.1972	Mohd Agy;	2.3.2011	10.05.2011	
217	Muhammad .Ijaz	Mir sahib Khan	B.A M.Ed	DEO Tank	1999	9.10.1977	SW Agy:	9.12.2002	5.10.2011	
218	Aqil Wazir	Gul Nazeer	M.Sc B.Ed	DEO L.Marwat	2003	1.3.1980	FR. Laki	9.5.2002	5.10.2011	
219	Maroof Khan	Akhya jan				4.7.1975	FR. Bannu			

CERTIFICATE:

It is certified that the Seniority List is Final, Undisputed and not Subjudice in any court.

Deputy Director (Estab)
E&SE Khyber Pakhtunkhwa
PESHAWAR

Wan
15/8/18

(5)



KHYBERPUKHTUNKHWA. PUBLIC SERVICE COMMISSION

2 Fort Road, Peshawar Cantt, (Near Governor House)

PH No. 9213563

9213750,9214131

Fax No. 9211795

No. PSC-/

19367

Dated 12/02/2014

SECRET
For M/A
To

The Secretary to
Govt of Khyber Pakhtunkhwa
Elementary & Secondary Education Department

Subject: PROVISION OF MERIT LIST OF A.D.O (B-16) IN E& SED.

I directed to refer to your letter No:SO (S) 3-2/09 Reg: Dated 16.05.2009 on the subject noted above and to forward the inter se merit of Male A.D.O (B-16) for your record and necessary action please.

Merit Order	Total Marks	D.O Birth	Name with Father name	District
1.	70/45	01.09.73	Waqar Khan S/o Sifat Ullah	Peshawar/2
2.	69/45	05.06.67	Ghulam Habib S/o Muhammad Wali	Moh:Agy/1
3.	69/45	15.03.70	Mehboob Iahi S/o Rahmat Iahi	Chitral/3
4.	69/45	03.02.76	Muhammad Farooq S/o Gul Raman	Karak/4
5.	68/45	08.04.70	Abdul Qayyum Khan S/o Haji Lal Khan	Abbottabad/5
6.	68/45	22.11.73	Muhammad Zahid Khan S/o Sher Zaman	Nowshera/2
7.	68/45	01.01.78	Shams ul Islam Niaz S/o Niaz Muhamad	Charsadda/2
8.	68/40	10.05.70	Sharafat Khan S/o Muhammad Aslam Khan	Abbottabad/5
9.	67/45	01.12.67	Mahmood Iqbal S/o Khairati Khan	D.I Khan/4
10.	67/45	15.05.69	Humayun khan S/o Muslim khan	Charsadda/2
11.	67/45	16.04.76	Muhammad Irshad S/o Niaz Farid	F.R Bannu/1
12.	67/43	01.03.73	Muhammad Anwar S/o Hazrt Umar	Mardan/2
13.	67/40	19.03.70	Zia Ullah S/o Zikria Khan	Peshawar/2
14.	67/38	06.05.68	Muhammad Ishfaq Khan S/o Muhammad Husain Khan	Abbottabad/5
15.	66/43	15.11.74	Shams ur Rehman S/o Malik ur Rehman	Mansehra/5
16.	66/45	25.12.69	Ifikhar Ahmad S/o Mumtaz Ahmad	Abbottabad/5
17.	66/45	21.05.72	Ghulam Sarwar S/o Ghulam Yahya	MKD/3
18.	66/45	19.07.72	Muhammad Zubair S/o Sabz Ali Shah	Charsadda/2
19.	66/45	06.01.76	Fazle Khuda S/o Waris Khan	Mardan/2
20.	66/45	23.02.76	Muhammad Rahman Shah S/o Gul Rahman Shah	Bannu/4
21.	66/43	22.03.71	Muhammad Sohail Khan S/o Mir Jaffar Khan	Nowshera/2
22.	66/40	08.09.70	Fazal Wahab S/o Ahmad Gul	Buner/3
23.	66/40	10.04.75	Muhammad Naseem S/o Husnul Maab	Swat/3
24.	66/38	05.01.62	Ali Haider S/o Bahadar Khan	Dir/3
25.	66/38	18.12.63	Muhammad Raza Shah S/o Muhammad Hanif	Dir /3
26.	65/45	10.04.73	Muhammad Islam S/o Fateh ul Mulik Khan	Dir/3

Secretary & Secretary
Elementary & Secondary
Education Department
B.P. Cantt Peshawar No. 397
Date 11/02/14

SECRET
10/2

NO 292
Date 11/02/14

at

41

28

27.	65/45	03.01.77	Dil Nawaz Khan S/o Dashat Mir	Karak/4
28.	65/45	15.04.77	Fida Muhammad S/o Firdous Khan	G.Swabi/3
29.	65/45	14.04.78	Muhammad Aftab S/o Masal Khan	Nowshera/2
30.	65/45	15.02.79	Hayat Khan S/o Nazeef Khan	Charsadda/2
31.	65/43	02.01.69	Muhammad Ajmal S/o Jamal ud Din	Mansehra/5
32.	65/40	01.01.67	Salih Muhammad S/o Shad Muhammad	Swabi/2
33.	65/40	16.01.68	Waheed Ullah shah S/o Mazhar Ali Shah	Bannu/4
34.	65/40	02.11.73	Abdul Malik S/o Muhammad Anwar	Khy:Agy/1
35.	65/40	28.02.76	Khalid Naeem S/o Malik Muhammad Amir	D.I Khan/4
36.	65/38	03.08.69	Abdul Khalid S/o Muhammad Ramzan	D.I Khan/4
37.	65/38	05.03.70	Gul Faraz S/o Shahid Khan	Karak/4
38.	65/38	11.01.71	Abdul Rehman Rashid S/o Inayat Ullah Jan	L.Marwat/4
39.	65/38	06.03.71	Abdul Wahab S/o Abdul Ghfoor	Swabi/2
40.	65/38	08.02.73	Imtiaz Khan S/o Taj Bareen	Nowshera/2
41.	65/38	28.04.78	Abdus Samad Jan S/o Sultan Ahmad	Peshawar/2
42.	64/45	12.04.74	Hamid Ullah S/o Khan Zaman	L.Marwat/4
43.	64/45	01.11.74	Muhammad Abid S/o Fazli Khaliq	Swabi/2
44.	64/45	27.12.74	Muhammada Azam S/o Bad shah Islam	MKD/3
45.	64/45	06.09.76	Raees Khan S/o Johar Gul	Khy:Agy/1
46.	64/45	03.04.79	Adil Muhammad S/o Ghani Muhammad	Swabi/2
47.	64/45	15.04.79	Shah Jehan Khan S/o H.Asalam Khan	Peshawar/2
48.	64/43	02.04.72	Love Dan S/o Amin Jan	Baj:Agy/1
49.	64/43	15.04.73	Amir Badshah S/o Tamash Gul	Mardan/2
50.	64/42	02.02.73	Muhammad Hamayun S/o Salam Gul	Karak/4
51.	64/40	01.04.70	Muslim Khan S/o Anwar Khan	Baj:Agy/1
52.	64/40	05.03.71	Niaz Wali Khan S/o Muhammad Yousaf	Swabi/2
53.	64/40	25.04.72	Muhammad Saleem S/o Abdul Haleem	Nowshera/2
54.	64/40	12.04.73	Shafiq ur Rehman S/o Abdur Rehman	Manshera/5
55.	64/40	17.08.74	Ahmad Ullah S/o Nasr Ullah	Charsadda/2
56.	64/38	13.02.66	Rais ur Rehman S/o Noor ur Rehman	Mansehra/5
57.	64/38	01.03.69	Muhammad Saeed ur Rehman S/o Abdul Hadi	Haripur/5
58.	64/38	25.07.69	Muhammad Zarif S/o Nawaz Ali	D.I Khan/4
59.	64/38	21.04.70	Muhammad Saeed S/o Muhammad Shafiq	Swat/3
60.	64/38	28.03.71	Muhammad Tariq S/o Noor Ali Khan	Bannu/4
61.	64/38	02.06.74	Hamid Rasool S/o Abdur Rasool	Bannu/4
62.	64/38	15.09.75	Hafiz Arshad Ali S/o Muhammad Sherin	Mardan/2
63.	64/35	01.01.68	Ashraf Ali S/o Abdullah Khan	F.R Bannu/1
64.	63/45	03.01.74	Qadir Shah S/o Sahib Shah	L.Marwat/4
65.	63/45	22.02.74	Muhammad Arshad S/o Wadud ur Rehman	Peshawar/2
66.	63/45	14.03.74	Irshad Khan S/o Khushal Khan	Peshawar/2
67.	63/45	01.02.76	Syed Ataullah Shah S/o Syed Muzarab Shah	Moh;Agy/1
68.	63/45	01.02.77	Shahzad Nadeem S/o Khurshid Ahmad	Chitral/3
69.	63/40	05.09.64	Habib ur Rehman S/o Badshah Khan	L.Marwat/4
70.	63/40	01.01.70	Abdul Samad S/o Muhammad Miskeen	Mansehra/5
71.	63/40	25.05.72	Chanzeb S/o Zarded Khan	Abbottabad/5

65
66
67
68
69
70
71

Handwritten signature or initials.

42

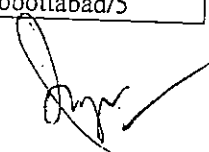
M

72.	63/40	01.04.73	Raja Babu Jahangir S/o Raja Sultan Mubarik	Mansehra/5
73.	63/40	16.04.74	Qaiser Khan S/o Muhammad Nawaz Khan	FR Bannu/1
74.	63/38	10.02.68	Sharaf ud Din S/o Gul Nadir Khah	Chitral/3
75.	63/38	08.04.68	Imtiaz Khan S/o Gul Zaman Khan	Dir/3
76.	63/38	01.01.69	Muhammad Khitab S/o Gulab	Dir/3
77.	63/38	10.04.70	Bakht Zada S/o Mashan Gul	Dir/3
78.	63/38	15.07.72	Zia ur Rehman S/o Said Rehman	Peshawar/2
79.	63/38	01.01.73	Ihtisham ul Haq S/o Fazal Haq	Malakand/3
80.	63/38	06.10.73	Rahim Khan S/o Hussain Khan	Peshawar/2
81.	63/35	18.04.70	Muhammad Saleem S/o Ghulam Sarwar	D.I Khan/4
82.	63/35	11.09.72	Sikandar Irfan S/o Faizullah Khan	D.I Khan/4
83.	63/35	08.03.74	Abdul Hafeez S/o Abdul Rashid	D.I Khan/4
84.	63/33	10.04.70	Shah Jehan S/o Gul Rahim Khan	Buner/3
85.	62/45	14.05.68	Ishtiaq Ahmed Khan S/o Muhammad Akram Khan	Abbottabad/5
86.	62/45	03.04.78	Mati Ullah Khan S/o Darawez Khan	FR Bannu/1
87.	62/43	30.04.73	Shabbir Ahmad S/o Qazi Fazli Hanan	Charsadda/2
88.	62/43	01.01.77	Jamshed Khan S/o Mehmood Khan	Swabi/2
89.	62/42	08.03.72	Riaz Khan S/o Mir Zali Khan	Bannu/4
90.	62/40	15.04.70	Rajab Ali S/o Mir Qadam Khan	S.W.Agy/1
91.	62/40	14.05.72	Muhammad Tahir S/o Habib Jan	Dir/3
92.	62/40	01.01.75	Farman Ullah S/o Aman Ullah	Peshawar/2
93.	62/40	15.03.75	Syed Ikram S/o Syed Mutamed Khan	Mardan/2
94.	62/40	18.07.77	Muhammad Azam Khan S/o Gul Khan	FR.Bannu/1
95.	62/40	04.04.78	Hameed ur Rehman S/o Saeed ur Rehman	Peshawar/2
96.	62/38	07.01.67	Saeed Mahmood S/o Hazrat Mahmood	Buner/3
97.	62/38	10.04.67	Fazali Qadir S/o Ali Asghar	Haripur/5
98.	62/38	15.03.69	Fahim Jan S/o Alif Khan	Peshawar/2
99.	62/38	10.04.69	Aurangzeb S/o Paidad Khan	Shangla/3
100.	62/38	07.09.69	Asad Ullah Shah S/o Nawab Ali Shah	Bannu/4
101.	62/38	20.02.71	Farman Ullah S/o Afsar Khan	Swabi (Disable)
102.	62/38	14.03.71	Abdul Waheed S/o Abdul Qadir	Abbottabad/5
103.	62/38	07.04.71	Altaf Hussain S/o Nasr ullah Khan	Malakand/3
104.	62/38	05.04.71	Muhammad Alamdin S/o Muhammad Iqbal Din	FR Bannu/1
105.	62/38	01.09.71	Saleh Bad Shah S/o Lal Bad Shah	L.Marwat/4
106.	62/38	18.11.71	Nasir Iqbal S/o Sakhi Mar Jan	Karak/4
107.	62/38	07.05.72	Akbar Ghani S/o Fateh Muhammad	Dir/3
108.	62/38	03.03.73	Muhammad Azeem Khan S/o Nawab Khan	N.W.Agy/1
109.	62/38	20.11.73	Sikandar Hayat S/o Sadiq Ullah	Swabi/2
110.	62/38	22.02.76	Muhammad Noor Sultan S/o Dilawar Khan	D. I Khan/4
111.	62/38	06.06.79	Khawaja S/o Zarin Khan	Dir/3
112.	62/38	11.08.79	Wisal Muhammad S/o Dost Muhammad	Charsadda/2
113.	62/35	01.04.64	Nisar Ahmad S/o Painda Gul	BAj:Agy/1
114.	62/35	20.11.64	Muhammad Iqbal S/o Baz Mula	Dir/3
115.	62/35	02.03.65	Zaheer Ud Din S/o Muhammad Saeed	Dir/3
116.	62/35	20.02.74	Habib Ullah S/o Muhammad Aslam	Tank/4(Disable)
117.	62/35	05.04.78	Hafiz Fazl e Akbar S/o Gohar	Swabi/2
118.	61/45	15.05.71	Mir Samad Khan S/o Hakeem Khan	Battagram/3
119.	61/45	29.09.75	Muhammad Ishtiaq S/o Mjuhammad Latif	Peshawar/2

Posi
M.A=2 marks
P.S+5
Service

43)

120	61/45	25.05.76	Muhammad Naeem S/o Mumtaz Khan	Karak/4
121	61/42	20.11.71	Syed Anwar Ali Shah S/o Syed Mahmood Shah	Moh:Agy/1
122	61/40	01.02.67	Shah Zar Khan S/o Hafte Khan	S.W.Agy/1
123	61/40	01.03.70	Muhammad Sharif S/o Sher Khan	Kurram Agy/1
124	61/40	16.03.71	Abdul Qayyum Khan S/o Abdul Hanan	Bannu/4
125	61/40	14.08.71	Ihsan Ullah S/o Amar Sher	Moh:Agy/1
126	61/40	10.12.73	Habib Ullah S/o Muhammad Iqbal	Peshawar/2
127	61/40	14.04.75	Muhammad Hayat Khan S/o Masal Khan	Nowshera/2
128	61/40	01.04.78	Sultan Muhammad S/o Ali Akbar	Mardan/2
129	61/40	23.06.78	Muhammad Isahaq S/o Muhammad	MKD/3
130	61/40	14.03.79	Fayaz ud Din S/o Jehan Badshah	Dir/3
131	61/38	14.04.73	Muhammad Hussain S/o Mir Abbas Khan	Karak/4
132	61/38	05.10.64	Muhammad Asif Khan S/o Muhammad Akram Khan	Abbottabad/5
133	61/38	06.03.65	Ata Ullah Shah S/o Ubaid Shah	G.Swabi/3
134	61/38	08.03.65	Said Zamin Shah S/o Aqlmin Shah	Malakand/3
135	61/38	18.03.66	Umar Farooq S/o Bahramand	Buner/3
136	61/38	01.05.66	Syed Ihsan Ullah Shah S/o Syed Lal Bad Shah	Peshawar/2
137	61/38	12.10.66	Imtiaz Ali S/o Haji Hayat Gul	Peshawar/2
138	61/38	21.08.67	Suhbat Ullah S/o Rehmat Ullah	S.W.Agy/1
139	61/38	04.03.68	Ifikhar Ali Khan S/o Zarif Khan	Mardan/2
140	61/38	09.05.68	Peer Muhammad Khan S/o Nadar Khan	Dir/3
141	61/38	04.10.69	Sakin Shah S/o Muhib Ali Shah	Peshawar/2
142	61/38	02.04.70	Iran Gul S/o Naseer Khan	Tank/4
143	61/38	20.12.70	Mushtaq Ahmad S/o Gul Zar Ahmad	Peshawar/2
144	61/38	21.01.71	Inam Ullah S/o Taj Muhammad	Peshawar/2
145	61/38	14.08.72	Fida Muhammad S/o Zareen Muhammad	Moh:Agy/1
146	61/38	04.01.74	Tahir Ahmad Khan S/o Rab Nawaz Khan	Lakki Marwat/4
147	61/38	07.03.74	Riaz Hussain S/o Taj Muhammad	Peshawar/2
148	61/38	03.02.75	Zahir Qamar S/o Shams ul Qamar	Peshawar/2
149	61/38	20.02.76	Irfan Ali S/o Gouhar Ali	Charsadda/2
150	61/38	16.11.76	Ajeeb Ullah S/o Saif Ullah	Dir/3
151	61/38	04.01.77	Wali ur Rahman S/o Fojun Khan	Battagram/3
152	61/38	09.05.77	S.Irshad Ali S/o Ali Afsar	Abbottabad/5
153	61/35	01.03.65	Said Bad Shah S/o Ali Ahmad	Swabi/2
154	61/35	01.01.67	Hafiz Muhammad Ziaullah S/o Ajab Gul	Kohat/4
155	61/35	06.04.68	Abdul Halim S/o Yamin	Shangla/3
156	61/35	19.03.69	Syed Anwar Shah S/o Syed Mardan Shah	Mansehra/5
157	61/35	05.01.70	Rohullah Jan S/o Misbah ud Din	Mardan/2
158	61/35	01.09.70	Asmat Ullah S/o Atta Muhammad	D.I Khan/4
159	61/35	12.12.70	Nasruminulah S/o Khan Ullah	Nowshera/2
160	61/35	12.02.71	Abdullah Khan S/o Zar Ghon Shah	Karak/4
161	61/35	24.12.71	Arshad Mehmood S/o Ghulam Nabi	Abbottabad/5




44

22

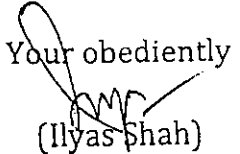
162	61/35	10.01.72	Muhammad Irfan S/o Mian Fazli Dayan	Nowshera/2
163	61/35	15.04.72	Wazir Zada S/o Sahib Zada	Mardan/2
164	61/35	10.09.73	Munib ur Rehman S/o Abdul Ghafoor	Abbottabad/5
165	61/35	26.10.73	Hikmatullah S/o Ali Muhammad	L.Marwat/4
166	60/40	08.08.70	Sajjad Rashid S/o Abdul Rashid	Peshawar/2
167	60/40	04.06.72	Noor Ajab Khan S/o Noor Muhammad Khan	Karak/4
168	60/40	27.04.74	Bismillah Jan S/o Abdul Ghaffar	Peshawar/2
169	60/40	06.06.74	Muhammad Sadiq S/o Muhammad Kamal	Mardan/2
170	60/40	15.01.75	Hashim Khan S/o Muhammad Nawaz Khan	L.Marwat/4
171	60/40	10.11.76	Muhammad Ashfaq Elahi S/o Farman Elahi	Peshawar /2
172	60/40	03.04.77	Sajjad Ahmad S/o Qazi Fazli Hanan	Charsadda/2
173	60/38	14.04.66	Khalil ur Rehman S/o Hastam Khan	Peshawar/2
174	60/38	24.11.67	Wajih ud Din S/o Fazal Mabood Jan	Dir/3
175	60/38	02.01.69	Haya Said S/o Mian Said	MKD/3
176	60/38	01.02.69	Sarmast Khan S/o Mir Rehman	Moh:Agy/1
177	60/38	25.03.69	Aman ul Mulk Shah S/o Said Ali Shah	Buner/3
178	60/38	18.08.69	Muhammad Tahir S/o Sawal Faqir	Dir/3
179	60/38	15.05.70	S.Sakhawat Ali Shah S/o S.Chiragh Shah	Peshawar/2
180	60/38	01.01.71	Nasrullah Khan S/o Nadar Khan	Dir/3
181	60/38	02.02.71	Janas Khan S/o Lal Rahim	Charsadda/2
182	60/38	06.02.71	Zahir ur Rehman S/o Mir Hussain	Hangu/4
183	60/38	02.01.72	Noor Muhammad S/o Said Muhammad	Baj:Agy/1
184	60/38	07.3.72	Mukhtiar Khan S/o Ismail Khan	Mardan/2
185	60/38	01.5.72	Muhammad Sayyar Khan S/o Muhammad Ullah	Peshawar/2
186	60/38	25.05.72	Shafiq ur Rehman S/o Zia ul Haq	Abbottabad/5
187	60/38	16.02.73	Zakir Hussain S/o Hussain Gul	MKD/3
188	60/38	27.03.73	Yousaf Shah S/o Abdur Rahim	Nowshera/2
189	60/38	03.04.73	Zahir Shah S/o Sardar Khan	Peshawar/2
190	60/38	30.04.74	Sajid Ullah S/o Zahir Shah	Moh:Agy/1
191	60/38	04.01.75	Muhammad Sheraz S/o Naseeb Gul	Karak/4
192	60/38	01.04.75	Said Zahid S/o Faiz Mahmood	Buner/3
193	60/38	06.04.75	Khalid Khan S/o Khan Bahadar	Mardan/2
194	60/38	12.04.75	Kirammat Ullah S/o Sattar Zaman	FR.Bannu/1
195	60/38	05.01.76	Muhammad Afsar S/o Hassan Zeb	Swabi/2
196	60/38	15.05.77	Hamood ur Rehman S/o Maqbool ur Rehman	Peshawar/2
197	60/38	20.11.77	Taj Alam S/o Sher Alam	FR.Bannu/1
198	60/38	16.06.81	Abdul Karim S/o Jehangir Khan	Peshawar/2
199	60/35	17.10.61	Miftah ud Din S/o Akbar Khan	Chitral/3
200	60/35	05.03.68	Haq Nawaz S/o Ahmad Khan	Battagram/3
201	60/35	15.06.68	Abid Hussain S/o Hussain Ghulam	Kurm:Agy/1
202	60/35	15.02.70	Muhammad Ishtiaq S/o Muhammad Ayub	Mansehra/5
203	60/35	03.04.70	Ashfaq Rasool Safi S/o Ghulam Rasool Safi	Moh: Agy/1
204	60/35	14.04.71	Muhammad Arif S/o Muhammad Junaid Khan	Swabi/2
205	60/35	12.04.73	Zamir Ahmad Khan S/o Ahmad Nawaz Khan	D.I khan/4
206	60/35	16.05.73	Shakeel Ahmad S/o Muhammad Ahmad	D.I Khan/4

45

71

21

207	60/35	06.01.74	Muhammad Saleem S/o Muhammad Azeem Khan	Peshawar/2
208	60/35	25.12.74	Zafar Khan S/o Munawaar Khan	Abbottabad/5
209	60/35	15.04.75	Jehangeer Khan S/o ShahJehan	Peshawar/2
210	60/35	19.11.75	Nisar Muhammad S/o Bahadar Khan	L.Marwat/4
211	60/35	10.12.75	Zafar Iqbal S/o Amir Badshah	Peshawar/2
212	60/35	18.06.77	Syed Mehmood ul Hassan S/o Syed Sarwar Shah	Abbottabad/5
213	60/35	18.06.77	Khams ul Haq S/o Mian Habib Jan	Peshawar/2
214	60/33	20.06.67	Waseem Fazal S/o Fazal ur Rehman	Abbottabad/5
215	60/33	01.01.68	Muhammad Tanveer S/o Faqeer Muhammad	Abbottabad/5
216	60/33	01.09.68	Tahir Shah S/o Qadar Shah	Mardan/2
217	60/33	08.05.72	Raees Khan S/o Sher Zaman Khan	MKD/3
218	60/30	13.03.67	Shams ur Rehman S/o Hafiz Abdul Hadi	Hangu/4
219	59/40	11.03.71	Syed Fazle Amin S/o Mir Hatem Shah	Charsadda/2
220	59/40	11.05.72	Sahib Kamal S/o Haji Fazal Zaman	Nowshera/2
221	59/40	04.10.72	Saeed Ahmad S/o Haji Dilber Khan	Shangla/3
222	59/40	10.06.73	Tariq Ahmad S/o Fazli Rashid	Dir/3
223	59/40	26.07.73	Muhammad Arshad Sharif S/o Sharif Khan	Kohat/4
224	59/40	01.04.74	Ulfat Ali S/o Daftar Shah	S.W.Agy/1
225	59/40	01.01.76	Qasim Ali Khan S/o Mumtaz Ali Khan	Peshawar /2
226	59/38	15.06.63	Hidayat Ullah S/o Khanzada Pacha	Dir/3 (Disable)
227	59/38	02.04.71	Abdul Khaliq S/o Sultan Mahmood	Mardan/2(Disable)
228	59/35	24.02.65	Fazli Subhan S/o Fazli Hanan	MKD Agy/3 (Disable)
229	59/38	25.04.70	Abdullah Khan S/o Sadin Khan	Kurm:Agy/1
230	59/38	18.03.73	Javed Iqbal S/o Ghulam Qadar	Baj:Agy/1
231	59/38	20.04.73	Malak Khan S/o Shahzad Khan	S.W.Agy/1
232	59/38	05.04.74	Naveed Ahmad S/o Muhammad Farid Khan	Mansehra/5
233	59/35	14.12.67	Sarfaraz Khan S/o Shahab ud Din	Mansehra/5
234	59/35	12.3.70	Shahab Din S/o Fazal Manan	N.W.Agy/1
235	59/35	01.3.72	Moheb ur Rehman S/o Muhammad Luqman	N.W.Agy/1
236	59/35	08.03.74	Sana ullah S/o Muhammad Sher Khan	F.R Bannu/1
237	58/45	01.01.74	Nadeem S/o Abdul Qayyum	Mansehra/5
238	58/38	29.10.65	Ghulam Jilani S/o Darwaish	Mansehra /5
239	58/38	15.04.73	Rab Nawaz S/o Gul Dad Khan	Abbottabad/5
240	58/38	16.04.74	Jehan Zeb Ali S/o Fariq Khan	Moh:Agy/1
241	58/38	11.11.76	Sung e Faris S/o Malook	Moh:Agy/1
242	58/38	10.09.77	Muhammad Ejaz S/o Mir Sahib Khan	S.W.Agy/1
243	58/38	03.01.80	Aqal Wazir S/o Gul Nazir	FR Lakki/1
244	58/35	07.04.75	Maruf Khan S/o Akhya jan	FR.Bannu/1

Your obediently

(Ilyas Shah)
Deputy Secretary-III

46

Amir H

Phone No : 091-9212976
Extension No: 111
Website: www.kppsc.gov.pk



**KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION**
2-Fort Road, Peshawar Cantt.

No. PSC/IT/P.I.O/ 000209

Dated: 3-1-2019

To

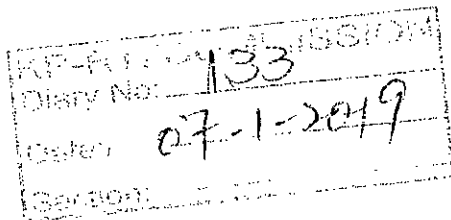
Commr-11

Assistant Registrar,
KP Information Commission,
7th Floor, Tasneem Plaza, Near Benevolent Fund Building, 6th Saddar
Road Peshawar.

**Subject: - COMPLAINT AGAINST NON-SUPPLY OF
INFORMATION (COMPLAINT NO:05243)**

With reference to your letter No.RTIC/AR/1-5243/18/11382-83 dated 05 Nov 2018 on the subject noted above and to state that the Commission has given two (02) marks of M.A Pashto and one (01) mark of M.Ed total three (03) marks have been given an account of additional/higher qualification and no other degree has been claimed.

2. Moreover, the Commission forwarded his application form with his recommendation letter to concerned Department. Furthermore, the complainant may request for his application form from the Elementary & Secondary Education Department.



Your's faithfully,

(Signature)
11/19

YASIR JAMSHED
(Manger Operation IT Branch)

(Signature)

47

(I)

The Secretary
Khyber Pakhtunkhwa, Public Service Commission Peshawar

Subject: **APPEAL FOR CORRECTION IN THE SENIORITY LIST OF ADEOS**

Respected Sir,

Most respectfully it is stated that with reference to my previous appeal through my department, the following facts are hereby submitted for your kind consideration please.

1. That according to the letter from your good office No. RTIC/AR/1-5243/18/993-94 Dated 25 Jan 2019, I claimed only on MA but when I obtained my application form through RTI from Directorate of E&SE my MA Pashto as well as MA Pak Studies both were mentioned therein.
2. I have been serving in E&SE Department since April 2014 for which I have been given no weightage.
3. That at the time of our selection for ADEO Post the commission did not intimated us our seniority but just our recommendation was sent to the department. Whereas the seniority was advertised by the Director E&SE in 2018. Therefore, I appealed to my department for correction. Neither in the recommendation nor in any other intimation, I was informed to appeal within six months. Moreover, the mistake is also not mine.
4. That non correction in the seniority list is a great loss for me.

In view of the above facts it is humbly requested that my appeal may please be accepted on humanitarian basis that I may be given the leftover additional 02 marks on MA Pak Studies and the weightage of my previous service in the E&SE Department.

D. No. 3046
Date 15/5/2019

KPK Public Service Commission
15 MAY 2019

Yours Obediently



Inam Ullah

S/O Taj Muhammad

ADEO Establishment

Office of the DEO (Male) Peshawar

Telephone No. 091-9222515



48

J

Rules

KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
2-FORT ROAD, PESHAWAR CANTT
(NEAR GOVERNOR HOUSE)

No.KPK/PSC/Li/RTI-63/2018

30155

Date: 30/11/2018

To:-

Assistant Registrar, Right to Information Commission, 7th Floor,
Tasneem Plaza, Near Benevolent Fund Building,
6th Saddar Road , Peshawar Cantt.

Subject: COMPLAINT AGAINST NON-SUPPLY OF INFORMATION COMPLIANT
NO. 5243.

Memo,

I am directed to refer to your letter No. KPIC/AR/1-5243/18/11993-95
dated 20.11.2018 the requisite information is hereby enclosed for necessary action
please. (Copy attached)

RIZWAN ULLAH
PUBLIC INFORMATION
OFFICER

Encl as above.

Copy to:

Inam Ullah AD O/O DEO(F) Peshawar at SDEO town-iv (F) Peshawar.

PUBLIC INFORMATION
OFFICER

49

**[KHYBER PAKHTUNKHWA]
PUBLIC SERVICE COMMISSION**

NOTIFICATION

15th December, 2003.

Notification No. ²KP/PSC/31550. In exercise of the powers conferred by Section 10(A) of the ³[Khyber Pakhtunkhwa] Public Service Commission (Amendment) Ordinance, 2002 (⁴[Khyber Pakhtunkhwa] Ordinance XXVII of 2002), the Commission is pleased to make the following Regulations.

PART - I

GENERAL

1. (a) These Regulations may be called the ⁵[Khyber Pakhtunkhwa] Public Service Commission Regulations, 2003.
(b) They shall come into force at once.
2. In these Regulations, unless the context otherwise requires: -
 - (a) "Attached Department" means the department as defined in the ⁶[Khyber Pakhtunkhwa] Government Rules of Business, 1985.
 - (b) "Appointing Authority" means the officer or authority designated as such in the Service Rules framed by the government for the post.
 - (c) "Commission" means the ⁷[Khyber Pakhtunkhwa] Public Service Commission.

¹ The word "NWFP" substituted with words "KHYBER PAKHTUNKHWA" vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

² The word "NWFP" substituted with word "KP" vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

³ The word "NWFP" substituted with words "Khyber Pakhtunkhwa" vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

⁴ The word "NWFP" substituted with words "KHYBER PAKHTUNKHWA" vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

⁵ The word "NWFP" substituted with words "Khyber Pakhtunkhwa" vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

⁶ The word "NWFP" substituted with words "Khyber Pakhtunkhwa" vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

⁷ The word "NWFP" substituted with the words "Khyber Pakhtunkhwa" vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

ng

50

PART – VII

MARKING SYSTEM FOR POSTS FILLED ²⁵[BY] OTHER THAN SYLLABUS BASED COMPETITIVE EXAMINATIONS.

29. (a) Marking in the case of posts filled other than prescribed syllabus and examination will be made out of 100 marks to be distributed between the academic achievements of the candidates and the interview as follow: -
- | | | |
|------|--|-----------------|
| i) | Academic Record | 30 Marks |
| ii) | Distinction for standing first in Board/ University/ Hifz-ul-Quran | 05 Marks |
| iii) | Additional relevant/ higher qualification | 05 Marks |
| iv) | <u>Experience</u> | <u>10 Marks</u> |
| v) | Interview | 50 Marks |
- (b) Minimum passing standard in the interview is 60%. In case experience is not a laid down qualification for any category of posts, the 10 marks allocated for experience shall be added to interview marks.
- (c) Academic scoring in respect of professional posts shall be based on the last three or four professional examinations, as the case may be, on the basis of percentage to 30 marks reserved for academic record and not on division wise basis. *For example*, if a candidate obtains 2150 marks out of 3650 marks out of a total three or four professional examination his credit will come to 17.67 marks out of 30. So in such cases, the candidate will be entitled to 18 marks.
- (d) In the case of non-professional posts, last three board or university examinations shall be taken into account. In the case of lecturer the marks obtained in Intermediate, Bachelor and Masters Examinations will be taken into account.

²⁵ The word "BY" inserted vide Notification No. PSC/ Accts/ Regulations/ 2003/ 4539 dated 12.02.2011.

57

- (e) Decimal fraction of 0.5 and above shall be considered one mark while less than that shall be ignored. To elaborate, a candidate securing 19.5 marks shall be considered to have secured 20 marks.
- (f) In cases where aggregate marks of different boards / universities are at variance conversion of marks shall be made both in the case of aggregate and secured marks of the candidates so as to maintain equity and uniformity in the calculation of overall score of the candidate.
- (g) ²⁶Deleted.
- (h) In cases where basic qualifications for the post are either intermediate or bachelor degree only last two or three examinations after Matriculation shall be taken into account.
- (i) In cases where the candidate fails to provide the proof of secured marks in a particular examination, he shall be deemed to have passed in parts and with the lowest passing marks.
- (j) Distinction marks shall be allowed only for standing first in a University / Board examination, at the rate of one mark per countable examination. However, the entitlement for the last and final examination shall be two marks. The entitlement of distinction marks shall be further subject to the condition that the examination was passed by obtaining 60% (Grade-B) and above marks²⁷ [].
- (k) Five marks reserved for additional qualifications shall be awarded at the rate of one or two marks respectively for every additional relevant Diploma or Degree. In the case of Diploma acquired after the minimum qualification one mark will be awarded while in the case of relevant degree two marks shall be awarded. For Doctorate of Philosophy (Ph.D) and equivalent qualifications, three marks shall be awarded. If the additional qualification is only a repetition of the original qualifications, no additional marks will be given.

Explanation. A candidate having MA English from Peshawar University will not be given additional marks for MA English from

²⁶ Clause (g) of Regulation 29 deleted vide Notification No.PSC/ Accts/ Regulations/ 2003/4539 dated 12.02.2011.

²⁷ The words "and was not a supplementary exam" appearing in the last sentence of Clause (j) of Regulation 29 deleted vide Notification No.PSC/ Accts/ Regulations/ 2003/4539 dated 12.02.2011.

53

Punjab University. The table below indicating the countable additional relevant qualifications to different subjects shall apply mutatis mutandis.

<u>Subject</u>	<u>of</u>	<u>Additional Relevant Subjects</u>
<u>Advertised Post</u>		
Arabic		Islamic Culture / Islamiyat.
Arabic-cum-Islamiyat		Islamic Culture / Islamiyat History
Astronomy		Mathematics, Physics.
Banking		Commerce/Economics/Statistics / ²⁸ [MBA]
Biology		Botany or Zoology, provided the candidate holds Master's Degree in both of them.
Botany		Zoology/Biology.
Chemistry		Applied Chemistry / Agriculture Chemistry / Chemical Engineering / Physical Chemistry.
Civics		History/ Public Administration/ Political Science/ Law ²⁹ / Pakistan Studies.
Commerce		Economics/Banking/Business Administration/ Statistics/Mathematics/ M.BA.
Education		Psychology.
General History		Specified Branch of period of History/ Political Science ³⁰ /Pakistan Studies.
Geography		Geology
Home Economics		Economics
Islamiyat		Arabic/ Islamic History/ Islamic Culture.
Islamic Culture		Islamiyat / Arabic / Islamic History
Islamic History		Any other branch or Period of History / Islamiyat/ Islamic Culture.
Law		Political Science/Civics.
Mathematics		Statistics / Astronomy / Physics and Applied /Pure Mathematics.
Mirco Biology		Botany/Bio-Chemistry/Zoology.
Persian		Arabic / Urdu
Philosophy		Psychology
Physics		Mathematics, Physical Chemistry
Political Science		Any Branch of History / Public Administration/Civics/Law ³¹ /Pakistan Studies.
Psychology		Philosophy

²⁸ The word "MBA" inserted vide Notification No.PSC/ Accts/ Regulations/ 2003/4539 dated 12.02.2011.

²⁹ The words "Pakistan Studies" added against the subject of Civics vide Notification No.PSC/ Accts/ Regulations/ 2003/4539 dated 12.02.2011.

³⁰ The words "Pakistan Studies" added against the subject of General History vide Notification No.PSC/ Accts/ Regulations/ 2003/4539 dated 12.02.2011.

³¹ The words "Pakistan Studies" added against the subject of Political Science vide Notification No.PSC/ Accts/ Regulations/ 2003/4539 dated 12.02.2011.

Handwritten signature

53

79

Pushto	Persian/Arabic/Urdu/English.
Social Work	Sociology/Psychology.
Sociology	Social Work/psychology.
Statistics	Mathematics
Urdu	Persian/Arabic/ Pushto/ English.
Zoology	Entomology/Botany/Bio-Chemistry.
English	Arabic./Urdu/Persian / Pushto.

Note: *Diploma / Degree not specifically listed above shall be decided by the Commission on the basis of academic relevance.*

- (l) Marks for Hifiz-ul-Quran will be awarded ³²[upto five] after having tested the proficiency of the candidate during the interview.
- (m) Experience marks shall be awarded only in those cases where experience forms part of the requisite qualifications. While awarding experience marks, the period of minimum requisite experience shall be deducted and thereafter one mark per year shall be awarded for additional experience upto five years. In case additional experience exceeds the limit of five years then the credit thereafter shall be one mark for two completed years. However, in the case of Teaching / Specialist posts in the medical profession involving experience, one mark per year shall be allowed after the requisite postgraduate qualification. The experience acquired before post-graduation for such category of post, shall count only for the purpose of eligibility.
- (n) The fraction of experience less than one complete year shall be ignored.
- (o) The marks obtained in screening test / ability test shall be counted only for shortlisting purpose.

h/s

³² The words "in between two to five" substituted with the words "upto five" vide Notification No.PSC/ Accts/ Regulations/ 2003/4539 dated 12.02.2011.

50 روپے	26175	PBA PESHAWAR BAR ASSOCIATION		
ایڈوکیٹ: <u>Alauddin</u>		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل / ایسوسی ایشن نمبر:		رابطہ نمبر: 03129215471		

بعدالت جناب: خیبر پختونخواہ سروس ٹریڈینگز

مخاطب: <u>اعلانیت</u>	دعویٰ:
<u>انعام اللہ</u>	علت نمبر:
<u>بنام</u>	مورخہ:
<u>تعمیم</u>	جرم:
	تھانہ:

باعت تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ

آن مقام مضامہ کیلئے نہ ملے جانے لہذا معارضہ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پرداختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 16/09/2019

الع گواہ شد الع
مقام مضامہ کے لیے منظور ہے۔

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 1335/2019

Inam Ullah:.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa & Others.....Respondents

INDEX

S.NO.	PARTICULARS	ANNEXURE	PAGE NO
1.	Joint Para-wise comments of the Respondents		1-4
2.	Affidavit		5
3.	Copy of Public Service Commission Advertisement 05/2009	"A"	6
4.	Copy of Appellant Descriptive Sheet & Experience	"B"	7-8
5.	Copy of Appellant Assessment Sheet	"C"	9
6.	Copy of Appellant representation dated 13.10.2016	"D"	10
7.	Copy of Public Service Commission letter dated 21.11.2016	"E"	11
8.	Copy of Appellant Second representation dated 15.05.2019 and PSC Reply dated 11.07.2019	"F"	12-13
9.	Copy of Public Service Commission Regulation 2003 37(13)	"G"	14-16
10.	Copy of PSC Letter dated 03.01.2019 against complaint No. 05243	"H"	17
11.	Copy of Supreme Court judgment dated 05.10.2020	"I"	18-21

P.O.F.
[Signature]
01/06/21

[Signature]
Senior Law Officer
Khyber Pakhtunkhwa
Public Service Commission
Peshawar

UMS88921263

25/01/2021

82

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1335/2019

Inam Uliah.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa & Others.....Respondents

JOINT PARAWISE COMMENTSON BEHALF OF (RESPONDENT NO.01 TO 06)

RESPECTFULLY SHEWETH:
PRELIMINARY OBJECTIONS:

1. As per Regulation 37(13) of the Khyber Pakhtunkhwa Public Service Commission repealed Regulation 2003, the request of the appellant is badly time barred, therefore, the instant appeal is liable to be dismissed.
2. The principle of estoppel operates against the appellant as the appellant on the basis of such merit order joined the post and working till date.
3. The august Supreme Court in C.P No 511-P/2013 titled Zia Ul Haq Vs Govt of Khyber Pakhtunkhwa & Others order dated 05.10.2020 decided the similar nature question i.e. unclaimed qualification infavour of Khyber Pakhtunkhwa Public Service Commission. Consistency warrants the dismissal of the instant service appeal also.
4. That the appellant has got no locus standi or cause of action against the replying respondent.
5. That no discrimination / injustice has been done to the appellant. Rather if the relief sought is granted in favour of the appellant it would constitute and tantamount to discrimination against other recommendees including the one likely to be suffered eventually.
6. That the instant appeal is not based on facts and is unjustified and an illegal demand against lawful authority of the Commission.
7. That the appellant is not substantially aggrieved from any act of Public Service Commission, therefore, instant appeal is not maintainable against respondent Commission.
8. That instant appeal is bad in the eyes of law, therefore, not sustainable against the Public Service Commission.

ON FACTS:

1. Pertains to personal information of the appellant. Needs no comments.
2. That the Khyber Pakhtunkhwa Public Service Commission advertised two hundred forty one (241) posts of Male Assistant District Officers (BPS-16) in Elementary and Seconda

Education Department vide Advertisement No. 05/2009 Serial No. 7 with following qualification:

QUALIFICATION: (i) B.A/B.Sc 2nd Div with B.Ed and five years teaching / administrative experience in Govt recognized Educational institutions / office.

AGE LIMIT: 25 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
61	40	40	40	30	30

Note: Experience wherever prescribed shall be counted after the minimum qualifications for the post(s), if not specifically provided otherwise against the advertised post(s).

(Annex-A)

Correct to the extent of recommendations, however, the appellant in his application form mentioned / claimed M.A (Pashto) & M.Ed Degrees only as higher qualification and was awarded additional marks accordingly. Rest of the para does not pertain to Public Service Commission.

3. Does not pertain to Public Service Commission.
- 4-5. Correct to the extent of securing 61/38 marks, however, rest of the para is incorrect. As already stated the appellant in his application form only mentioned / claimed M.A (Pashto) and M.Ed degrees being higher qualification, therefore, three (03) additional marks to the extent of such degrees were awarded to the appellant. Descriptive and assessment sheets **(Annex-B & C)**. The appellant filed an application to the Public Service Commission on 13.10.2016 for additional marks **(Annex-D)** however, the same being time barred regretted vide reply dated 21.11.2016 **(Annex-E)**. Similarly the appellant made another application dated 15-05-2019 same was replied vide letter dated 11-07-2019, which was also regretted being time barred **(Annex-F)**. It is pertinent to mention here that as per the law prevailing at the relevant time the appellant request was entertainable in specified period only. Regulation 37(13) of the Khyber Pakhtunkhwa Public Service Commission repealed Regulation 2003 is reproduced below for assistance.

"Answer books of candidates will be retained in the office of KP PSC for one year after recommendations against the posts are issued and thereafter these will be destroyed. Similarly, application forms/ copies of documents of non-selected candidates shall also be destroyed after one year of the issuance of recommendations. Any query relating to their answer books or application forms should be made by the candidates within the specified period, thereafter; no request in this regard shall be entertained. However, answer

candidates shall also be destroyed after one year of the issuance of recommendations. Any query relating to their answer books or application forms should be made by the candidates within the specified period, thereafter; no request in this regard shall be entertained. However, answer books or applications forms/ copies of documents of candidates wherein a query or an enquiry or a court case is pending shall be kept on record till final disposal of the query/ enquiry/ court case."

(Annex-G)

Moreover, the appellant also filed an application to RTI in response to such the Public Service Commission had clearly mentioned that the appellant had not claimed M.A (Pak Study) therefore, no additional marks could be awarded and further that application form of the appellant had been sent to the concerned department with recommendations **(Annex-H)**. Furthermore, the august Supreme Court in C.P No. 511-P/2013 titled as Zia Ul Haq on 05.10.2020 held that

"7.... Looking from this angel, we find that the impugned Judgment suffers from illegality in that it did not give material weight to the fact that the respondent has not at all mentioned about his additional qualification in his application submitted to the KPK Public Service Commission. Had he mentioned about his qualification, his case would have been covered by the latter mentioned judgment.

8. For the forgoing reasons, this petition is converted into appeal and allowed and the impugned judgment is set aside."

(Annex-I).

Thus, on the basis of above stated facts and law the appellant request is firstly, badly time barred. Secondly, the M.A (Pak Studies) degree was not mentioned / claimed by the appellant and lastly the principle of estoppel operates against him.

6. Incorrect. The appellant may not be allowed to raise grounds to waste the precious time of this Honorable Service Tribunal.

GROUND.

- A.** Incorrect. The appellant could secure 61/38 marks only, therefore, was placed on merit order No. 144. Thus, no illegality of violation of rules can be attributed to Public Service Commission.
- B-C.** Incorrect. As already explained in para No. 04 & 05 of the facts.
- D-F.** Incorrect. No fundamental right of the appellant has been violated by the replying respondent rather the law dictates the treatment on merit, thus, was awarded marks that he could secure.

G. As the appellant is not genuinely aggrieved person, by any act of Khyber Pakhtunkhwa Public Service Commission, may not be allowed to raise further ground against Khyber Pakhtunkhwa Public Service Commission to waste precious time of this Honorable Service Tribunal.

It is, therefore, respectfully prayed that on acceptance of the submissions made herein above, the instant appeal being not maintainable against the replying respondents may kindly be dismissed with costs having no legal footings.



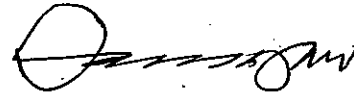
**CHIEF SECRETARY
KHYBER PAKHTUNKHWA
PESHAWAR
(RESPONDENT NO. 01)**



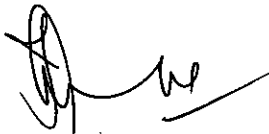
**CHAIRMAN
KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
PESHAWAR
(RESPONDENT NO.02)**



**SECRETARY
ELEMENTARY & SECONDARY EDUCATION
PESHAWAR
(RESPONDENT NO.03)**

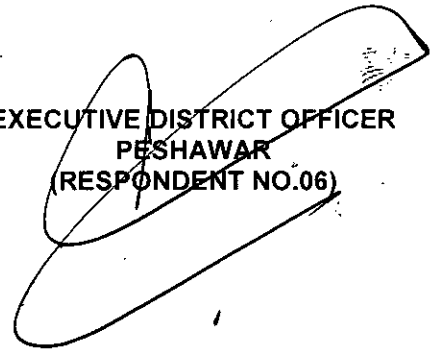


**DIRECTOR
ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA
PESHAWAR
(RESPONDENT NO.04)**




**SECRETARY
KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION PESHAWAR
(RESPONDENT NO.05)**

**EXECUTIVE DISTRICT OFFICER
PESHAWAR
(RESPONDENT NO.06)**



AFFIDAVIT

Stated on oath that the contents of this Para wise comments are true and correct & nothing has been concealed from this Honorable Court.

DEPONENT

**CHAIRMAN
KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
PESHAWAR**

6

Annex-A

NWFP PUBLIC SERVICE COMMISSION

2- Fort Road Peshawar Cantt:

Website: www.nwfppsc.gov.pk

Tele: Nos. 091-9214131, 9213563, 9213750, 9212897

Dated: 04-06-2009

ADVERTISEMENT No. 05 / 2009.

Applications, on prescribed form, are invited for the following posts from Pakistani citizens having domicile of N.W.F.P / F.A.T.A by 04-07-2009 (candidates applying from abroad by 18-07-2009). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall be rejected without intimation to the candidates

ELEMENTARY AND SECONDARY EDUCATION DEPTT:

7. **TWO HUNDRED AND FORTY ONE (241) POSTS OF MALE ASSISTANT DISTRICT OFFICERS (BPS-16)**

QUALIFICATION: (i) B.A/B.Sc 2nd Div with B.Ed and five years teaching / administrative experience in Govt recognized Educational institutions / office.

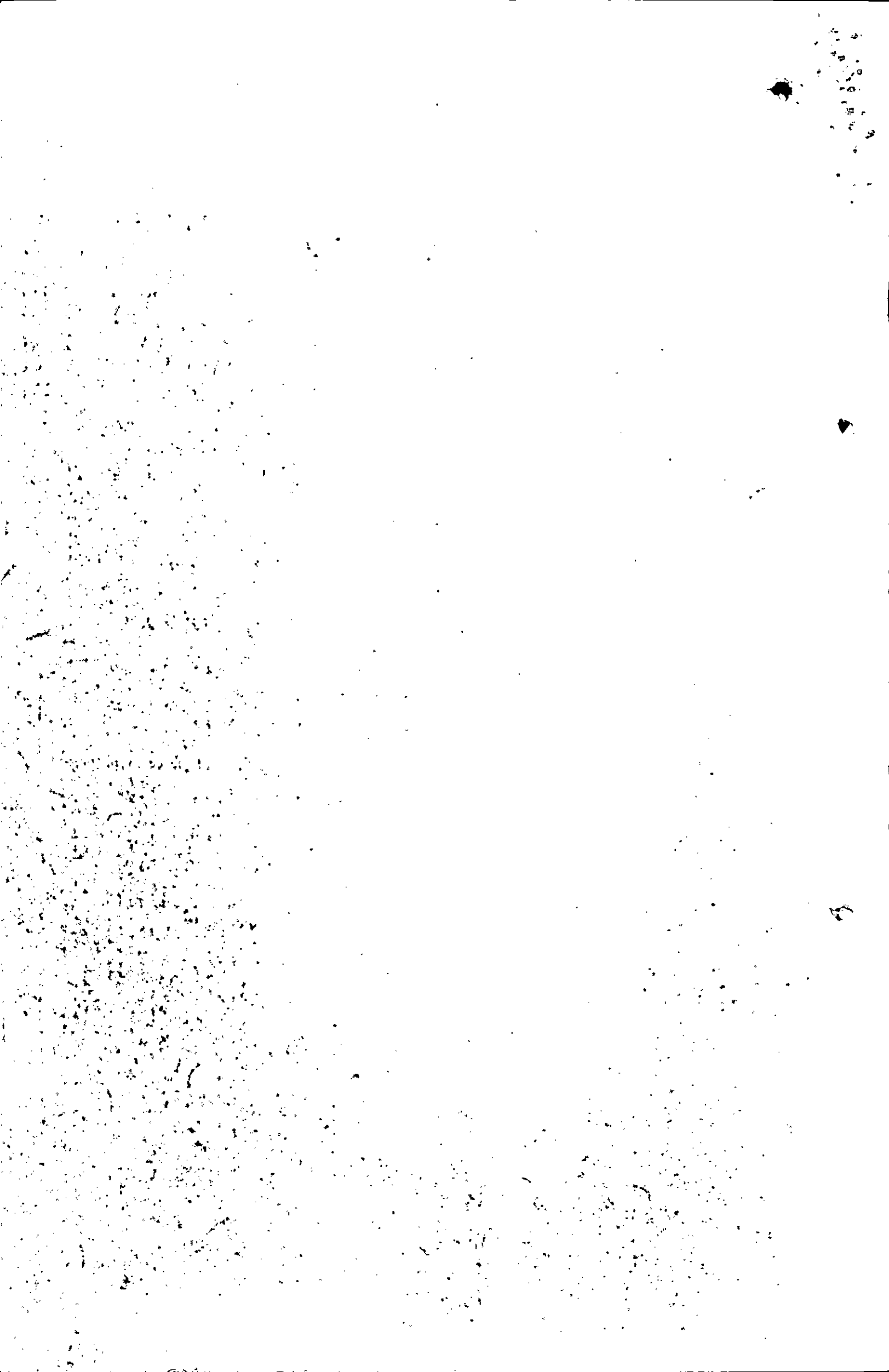
AGE LIMIT: 25 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
61	40	40	40	30	30

Note: Experience wherever prescribed shall be counted after the minimum qualifications for the post(s), if not specifically provided otherwise against the advertised post(s).

(ATTA-UR-REHMAN)
Secretary
NWFP Public Service Commission
Peshawar



(7)

Annex-¹³

[Handwritten signature]

04	3694	Rustam Khan S/O Abdul Majeed	04.03.72/37.04.03	L. Marwat/4
----	------	---------------------------------	-------------------	-------------

Qualification

D.Com(384/750) 563/1100 1989
 BA 248/550 1992
 Bed 535/1000 2000
 $1661/2650=18.80=19$
 Add:/Higher Qual: MA Islamiat 2004
 Distinction/Hifz: Nil
 Experience:- PST permanent from 01.09.1992
 Applied for:- Nil

Fail dan

05	1724	Inam Ullah S/O Taj Muhammad	21.01.71/38.05.13	Peshawar/2
----	------	--------------------------------	-------------------	------------

Qualification

FSc 499/1100 1989 (In Parts)
 BA 312/550 1994
 Bed (539/900) 599/1000 1997
 $1410/2650=15.96=16-1=15+3+5+38=61$
 Add:/Higher Qual: M.A (Pashto) 1995
 Med in 2001

75
61

Distinction/Hifz: Nil
 Experience:- C.T / PTC Since 26.05.1994
 Applied for:- Nil

Checked by;

Singed by;

[Handwritten signature]

Amir Ilyas Asstt _____ Rustam Khan Supdt: _____ Masood Zaman DS-III _____

[Handwritten signature]

21



(8)

Subject: Experience for the Post of Male ADO

DATED: 30.04.2010

934

S.No	Name of Candidates	From.....to	Y M D			
			Total	Req	Ent	
1.	Samee Ud Din S/O Muhammad Nadir Shah	25.02.01 To 04.07.2009	Total	08	04	09
			Req	05	00	00
			Ent	03	04	09
2.	Masood Ahmad S/O Maqbool Ahmad	3.01.1993 To 04.07.2009	Total	16	05	21
			Req	05	00	00
			Ent	11	05	21
3.	Saeed Uz Zaman S/O Muhammad Jan	3.08.2003 To 04.07.2009	Total	05	11	01
			Req	05	00	00
			Ent	00	11	01
4.	Rustam Khan S/O Abdul Majeed	16.11.2000 To 04.07.2009	Total	08	07	18
			Req	05	00	00
			Ent	03	07	18
5.	Inam Ullah S/O Taj Muhammad	31.03.98 To 04.07.2009	Total	11	03	03
			Req	05	00	00
			Ent	06	03	03

9

Annex - "C"

ASSESSMENT AT WVA VOICE TEST

(i) Post No. 1234 (ii) Vacancies: 24
(iii) Class: 1234 (iv) Time: 0900 hours (v) Date: 30.04.2010

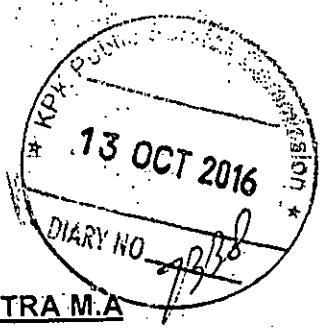
Candidate's Serial Number

		1	2	3	4	5	6	7	8	9	10	11	12
Part-A (30/20 Marks)													
Academic rating.		15	15	15	19	16							
Additional attempts deduction		1	2	-	-	1							
Total Part-A		14	13	15	19	15							
Part-B													
(i) Additional relevant qualifications / Higher qualifications	05 Marks	3	3	3	2	3							
(ii) Distinction / Hafiz-ul-Quran	05 Marks												
(iii) Experience	10 Marks	2	8	-	3	5							
Total-B		5				8							
Part-C													
Viva-Voce Test	50 / 60 Marks	30	Absent		F	F	38						
GRAND TOTAL [Part A + B + C]		49					61						

JAKHAN
CHAIRMAN

Member

✓ (10) "D"
Annex



The Secretary,
Khyber Pakhtunkhwa,
Public Service Commission.

Subject
R/sub

APPLICATION FOR ADDITIONAL MARKS ON THE BASIS OF EXTRA M.A DEGREES.

Most respectfully it is stated that I was selected as ADO in Elementary and Secondary Education department by PCS in 2011 but according to the seniority list recently propagated by Elementary and Secondary Education department, I have been deprived of the additional marks on the basis of my extra M.A degrees which causes me a great loss.

In view of the above facts it is requested that I may please be given the additional marks on the basis my extra M.A degrees (copies attached).

Thanking in anticipation

Your obediently

Inam Ullah s/o Taj Muhammad
Village & P.O Gulozai Tehseil District
Peshawar

DB
137/13
11/10
DD-5
AMI



(11) ✓ Annex. E 32 ✓
KHYBERPUKHTUNKHWA PUBLIC SERVICE COMMISSION
2 Fort Road, Peshawar Cantt, (Near Governor House)
PH No. 9213563
9213750,9214131
Fax No. 9211795
No. PSC-/IX/ 092199

Dated 21/11/16

To

Mr. Inam Ullah s/o Taj Muhammad
Village & P.O Gulozai Tehsil District Peshawar.

Subject: Application for additional marks on the basis of extra M.A Degree.

Memo,

With reference to your application dated 13.10.2016 on the cited subject above and to state that no query /request relating to application form/ documents shall be entertained after the six months of the issuance of the recommendation as per our regulation. Therefore, your request can not be entertained after a lapse of six years.

Your's Faithfully,

(Fazal Qayyum)
Assistant Director -III.

24/11/16

(12)

✓ "F"
Annex-F
15 MAY 2019
Khyber Pakhtunkhwa Public Service Commission
Peshawar

To

The Secretary
Khyber Pakhtunkhwa, Public Service Commission Peshawar

Subject: APPEAL FOR CORRECTION IN THE SENIORITY LIST OF ADEOS

Respected Sir,

Most respectfully it is stated that with reference to my previous appeal through my department, the following facts are hereby submitted for your kind consideration please.

1. That according to the letter from your good office No. RTIC/AR/1-5243/18/993-94 Dated 25-Jan-2019, I claimed only on MA but when I obtained my application form through RTI from Directorate of E&SE my MA Pashto as well as MA Pak Studies both were mentioned therein.
2. I have been serving in E&SE Department since April 2014 for which I have been given no weightage.
3. That at the time of our selection for ADEO Post the commission did not intimated us our seniority but just our recommendation was sent to the department. Whereas the seniority was advertised by the Director E&SE in 2018. Therefore, I appealed to my department for correction. Neither in the recommendation nor in any other intimation, I was informed to appeal within six months. Moreover, the mistake is also not mine.
4. That non correction in the seniority list is a great loss for me.

In view of the above facts it is humbly requested that my appeal may please be accepted on humanitarian basis that I may be given the leftover additional 02 marks on MA Pak Studies and the weightage of my previous service in the E&SE Department.

copy to: Director E&SE Khyber Pakhtunkhwa Peshawar

Support
Assist
Director

AD
11/11/19
16/5/19

Yours Obediently

Inam Ullah

S/O Taj Muhammad

ADEO Establishment

Office of the DEO (Male) Peshawar



13 ✓
KHYBERPUKHTUNKHWA PUBLIC SERVICE COMMISSION

2 Fort Road, Peshawar Cantt, (Near Governor House)

PH No. 9213563

9213750, 9214131

Fax No. 9211795

D 014487 - 89

11-7-2019

To

Mr. Inam Ullah s/o Taj Muhammad
ADEO Establishment Office of the DEO(Male) Peshawar.

Subject: Application for correction in the seniority list of ADEOs

Memo:

Kindly refer to your appeal dated 5.5.219 on the subject noted above it is to inform you that your request has been examined by the commission and regrets in ability to accede being time barred. Moreover, the Commission has already replied earlier vide letter no. PSC/SR/IX092199 dated 21.11.2016 (copy enclosed).

Your's Faithfully

(Masroof Gul)

Assistant Director -III

Copy to:

1. Secretary, Elementary & Secondary Education, Department, KPK.
2. Director Elementary & Secondary Education.

(Masroof Gul)

Assistant Director -III

(14)

Answer "G"

**¹[Khyber Pakhtunkhwa]
PUBLIC SERVICE COMMISSION**

NOTIFICATION
15th December, 2003.

Notification No. ²[Khyber Pakhtunkhwa]/PSC/31550. In exercise of the powers conferred by Section 10(A) of the ³[Khyber Pakhtunkhwa] Public Service Commission (Amendment) Ordinance, 2002 (⁴[Khyber Pakhtunkhwa] Ordinance XXVII of 2002), the Commission is pleased to make the following Regulations.

PART – I
GENERAL

1. (a) These Regulations may be called the ⁵[Khyber Pakhtunkhwa] Public Service Commission Regulations, 2003.
- (b) They shall come into force at once.
2. In these Regulations, unless the context otherwise requires: -
 - (a) "**Attached Department**" means the department as defined in the ⁶[Khyber Pakhtunkhwa] Government Rules of Business, 1985.
 - (b) "**Appointing Authority**" means the officer or authority designated as such in the Service Rules framed by the government for the post.
 - (c) "**Commission**" means the ⁷[Khyber Pakhtunkhwa] Public Service Commission.
 - (d) "**Member**" means the Member of the Commission and includes the Chairman.
 - (e) "**Department**" means a department as defined in the ⁸[Khyber Pakhtunkhwa] Government Rules of Business, 1985.
 - (f) "**Departmental Representative**" means the senior officer of the department of the government to which post/s relates and who assists the Committee / Panel of the Commission for conducting the viva-voce / interview.
 - (g) "**Subject Specialist**" means the advisor called for interview by the Commission from the University / Colleges / Institutions / Autonomous Bodies / Retired Officer directly or through the Head of Department.
 - (h) "**Government**" means the Government of ⁹[Khyber Pakhtunkhwa]
 - (i) "**Committee**" means the Committee of one or more Members constituted by the Chairman for any specific task.

¹ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

² Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

³ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

⁴ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

⁵ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

⁶ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

⁷ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

⁸ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

⁹ Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

15

16

- (2) Where the experience forms part of the requisite qualifications, the recommendation of in-service candidates shall be conveyed provisionally subject to perusal of their ACRs by the Commission and finding these satisfactory.
- (3) (a) Where a large number of subjects / specialties are included in an advertisement, recommendations may not be pending till the finalization of the entire batch but instead zonal allocation be worked out subject-wise and recommendation conveyed to the Department without indicating to them the zonal allocation and the inter-se-seniority. In recommendations to the Department it shall be made clear that the inter-se-seniority of the recommendee is linked with other subjects and the overall merit position and zonal adjustment will be intimated on the completion of interviews in all subjects. The chronological order of the recommendees shall not confer any right of seniority.
- (b) The combined merit list shall be against a particular advertisement where the posts were advertised collectively but recommendations were staggered due to interview schedule or any other reason.

PART – XII

36. PANEL OF EXAMINERS / CONDUCT OF COMPETITIVE EXAMINATION.

- (1). The Commission shall maintain a panel of approved Examiners for various written examinations. The panel shall be reviewed periodically by the Chairman to ensure that a sufficient number of competent Examiners are available on the panel.
- (2). The Examiners for various examinations shall be appointed from the approved panel by the Chairman / Members authorized by the Commission in this behalf. As far as possible the answer sheets will be evaluated by the examiners who had prepared the question papers. In case the appointed examiner is unable to mark the papers for certain reasons then the ⁴³[Chairman] in its discretion may appoint another examiner from the approved panel.
- (3). There shall be no rechecking, reevaluation and reappraisal of the awarded marks and score once given on the answer sheet by the examiner shall be final. However, where some answer is left unmarked or an arithmetical mistake made by the examiner is noticed, necessary rectification of the mistake shall be made by the same examiner.

37. CONDUCT OF COMPETITIVE EXAMINATIONS.

- (1). The Director Examinations shall be the overall incharge of the examinations including appointment of the supervisory staff for different examinations and shall ensure that the examinations are conducted in accordance with the laid down instructions of the Commission.
- (2). A Member or an Officer of the Commission shall be designated as incharge of an examination center / centers. He shall be issued brass seals for each center for sealing the canvas bags in which the scripts are placed.
- (3). The brass seals shall be delivered to the examination center under the supervision of the Member / Officer. At the end of examination, these will be promptly collected. If there are two papers in a day, the scripts of the morning papers must be sealed immediately at the end of the examination. After completion of the After Noon's paper, the canvas bags shall be sealed and the scripts delivered to the Director of Examination or his representative.

⁴³ . The word "Commission" replaced by the word "Chairman" vide Notification No.PSC/ PA/ Reg/02 dated 31.01.2004.

- 16
- (4). The seals shall remain in the custody of the Member / Officer incharge till the scripts are dispatched to the examiners concerned.
 - (5). The canvas sealed packets / bags shall be opened by the Chairman or Member Incharge. These will be embossed in his presence and the fictitious numbers marked on the scripts. The roll number slips duly marked with the fictitious numbers shall be placed in an envelope and sealed. The sealed envelope shall be delivered to the Chairman, and the answer book handed over to the Registrar Examinations.
 - (6). The Registrar Examinations shall be responsible for checking and transmission of the scripts to the Examiners.
 - (7). The Registrar Examination shall deliver the sealed question papers to the Member / Officer Incharge of the center. The Member / Officer Incharge shall arrange delivery of the sealed question papers to the examination centers under his own supervision.
 - (8). During the examination, the Member / Officer incharge shall arrange to get the scripts sealed with his special rubber stamp. If the number of centers are such that stamps cannot be affixed in every center it may be done as is possible. It may be ensured that in a center which is selected for this purpose scripts of all the examinees be stamped as far as possible.
 - (9). The respective representatives of the Commission appointed in various examination halls shall be responsible to deliver the sealed canvas bags to the Director Examination or his representatives if the Examination is held locally. In the case of outstation examination, the sealed bags shall be handed over to the concerned Member/ Officer who may deliver the same to the Examination Section on his return.
 - (10). The Director Examination shall maintain a complete record of each paper on Form PSC.23.
 - (11). Ordinarily there shall be no change of Examination Centre. However, in order to avoid hardship the Chairman may authorize change of centre in exceptional cases.
 - (12). Where candidate suffers from a disability which renders him / her unable to write, may apply to the Commission duly supported with the disability certificate before the written examination for the arrangement of an amanuensis. The Commission shall provide the amanuensis from the office who shall be of lower grade of education than the candidate.
 - (13). Answer books of candidates will be retained in the office of KP PSC for one year after recommendations against the posts are issued and thereafter these will be destroyed. Similarly, application forms/ copies of documents of non-selected candidates shall also be destroyed after one year of the issuance of recommendations. Any query relating to their answer books or application forms should be made by the candidates within the specified period, thereafter, no request in this regard shall be entertained. However, answer books or applications forms/ copies of documents of candidates wherein a query or an enquiry or a court case is pending shall be kept on record till final disposal of the query/ enquiry/ court case.⁴⁴

PART – XIII

38. RULES OF PROCEDURE

- (1). The decisions of the Commission shall be by a majority of votes of the Members present and in the case of tie, the Chairman shall have, a second or casting vote.

⁴⁴ Clause (13) in Regulation 37 is substituted vide Notification No. KPSC/B&A- dated 12.03.2014

Amber H

17

Phone No : 091-9212976
Extension No: 111
Website : www.kppsc.gov.pk



**KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION**
2-Fort Road, Peshawar Cantt.

No. PSC/IT/P.I.O/ 000209

Dated: 3-1-2019

To

Assistant Registrar,
KP Information Commission,
7th Floor, Tasneem Plaza, Near Benevolent Fund Building, 6th Saddar
Road Peshawar.

**Subject: - COMPLAINT AGAINST NON-SUPPLY OF
INFORMATION (COMPLAINT NO:05243)**

With reference to your letter No.RTIC/AR/1-5243/18/11382-83 dated 05 Nov 2018 on the subject noted above and to state that the Commission has given two (02) marks of M.A Pashto and one (01) mark of M.Ed total three (03) marks have been given an account of additional/higher qualification and no other degree has been claimed.

2. Moreover, the Commission forwarded his application form with his recommendation letter to concerned Department. Furthermore, the complainant may request for his application form from the Elementary & Secondary Education Department.

Your's faithfully,

YASIR JAMSHED
(Manger Operation IT Branch)

alc

18

1

Annex 2e -

**IN THE SUPREME COURT OF PAKISTAN
(APPELLATE JURISDICTION)**

PRESENT:
MR. JUSTICE GULZAR AHMED, HCJ
MR. JUSTICE PAISAL ARAB
MR. JUSTICE IJAZ UL AHSAN

CIVIL PETITION NO. 511-P-OF-2013
(On appeal against the judgment dated
12.06.2013 passed by Peshawar High Court,
Peshawar in Writ Petition No. 3647/2010)

Government of KPK through Chief Secretary, Peshawar etc.
.....Petitioner(s)

VERSUS

Zia ul Haq and others
.....Respondent(s)

For the Petitioner(s): Barrister Qasim Wadood, Addl. A.C. KPK
Mr. Hamid Saleem, Law Officer, PSC KP
Mr. Mehtab Gul, Law Officer, PSC KP

For the Respondents: Mr. Zia ur Rehman Tajik, ASC
(For respondent No. 1)

Nemo
(For respondent Nos. 2-5)

Date of hearing: 05.10.2020

ORDER

GULZAR AHMED, C.J.: An advertisement was published on 22.04.2009 for making appointment of District Public Prosecutor (BS-17). Respondent No. 1 (the respondent) applied for the said post. Test and interview was held but his name was not shown in the merit list. The respondent filed writ petition in the Peshawar High Court, Peshawar and through the impugned judgment dated 12.06.2013 the petitioners were directed to give two additional marks to the respondent for his additional qualification and thereafter to prepare the merit list.

2. Learned Additional Advocate General has contended that the two additional marks could have been granted to the

ATTESTED

Assistant Registrar

respondent had the respondent declared his additional qualification in his application for the said post. However, the respondent did not declare his additional qualification and; therefore, the additional marks were not granted to him.

3. On the other hand, learned counsel for the respondent contends that the respondent had additional qualification of M.A. Political Science but he did not mention such additional qualification in his application for the reason that he did not had in his hand the degree. He further contends that subsequently the respondent obtained the marks-sheet as well as the degree of MA Political Science and filed the same in the Public Service Commission for considering him for being appointed to the post he has applied. Learned counsel in support of his submissions has relied upon the judgments of this Court reported as Habibur Rehman Vs. Government of Pakistan (1979 SCMR 121) and Jahanzaib Malik Vs. Balochistan Public Procurement Regulatory Authority (2018 SCMR 414).

4. It is admitted fact that the respondent did not at all disclose his additional qualification in his application which he submitted before the Public Service Commission for being appointed as District Public Prosecutor (BS-17). It is the claim of the respondent that he filed the result as well as the degree of his additional qualification of MA Political Science with the Public Service Commission in November, 2009. Learned counsel, however, has failed to point out any document which may show that the respondent has submitted the documents of his additional qualification in the Public Service Commission.

5. In any case, we note that the respondent's marks-sheet, which he has filed with CMA No. 908-P/2020 at page 18,

20

CIVIL PETITION NO. 511-P OF 2013

3

shows that the respondent has appeared in *Master of Arts in Political Science Final Annual Examination 2006*. It also shows that it was issued on 29.08.2009. However, the photo copy of the degree which is at page 13 of the said CMA shows that respondent has appeared in the annual examination of 2006 and obtained *Master in Arts degree in Political Science* and such degree was issued to the respondent on 30.08.2009.

6. We are not at all satisfied with the reply of the learned counsel for the respondent for the reason that way back in the examination of 2006, he is said to have passed *MA Political Science* but when he put up the application against the advertisement, he did not mention his additional qualification of *MA Political Science*. No reason has been given by the learned counsel for the respondent as to why the respondent did not mention his additional qualification except that the respondent did not possess the documents of his additional qualification. Where the factum of additional qualification was known to the respondent, he ought to have mentioned the same in his application form submitted to the *KP Public Service Commission* but he did not and came up with this additional qualification when the process of appointment was on the verge of completion. In our view, the *KP Public Service Commission* was justified in not showing the name of the respondent on the merit list for which respondent himself is to be blamed and no one else.

7. The two judgments referred above by the learned counsel for the respondents are distinguishable from the facts and circumstances of the present case for the reason that one is in respect of domicile and in the other the candidate had declared his qualification while applying for the post and merely on obtaining

ATTESTED

Record with Case Officer

(21)

the degree subsequently, the Court held that he will not be debarred from being considered for appointment. The present case where the respondent himself did not at all mention about his additional qualification in the application, he cannot be allowed to take up the plea that he got copy of the marks-sheet and degree subsequently and thus was entitled to grant of additional marks. Looking from this angle, we find that the impugned judgment suffers from illegality in that it did not give material weight to the fact that the respondent has not at all mentioned about his additional qualification in his application submitted to the KPK Public Service Commission. Had he mentioned about his qualification, his case would have been covered by the latter mentioned judgment.

8. For the forgoing reasons, this petition is converted into appeal and allowed and the impugned judgment is set aside.

CMA No. 730-P/2013

9. Since, the main petition has been converted into appeal and allowed, this CMA has become infructuous and is disposed of accordingly.



Sd- Qulzar Ahmed, HCJ
Sd- Faizal Arab, J
Sd- Yas ul Ahann, J

Certified to be true copy
Assistant Registrar
Supreme Court of Pakistan
Peshawar. 18/10/2020

PLJ 2017 Lahore 398 (DB)
[Bahawalpur Bench, Bahawalpur]

Present: MUHAMMAD SAJID MEHMOOD SETHI AND TARIQ IFTIKHAR AHMED, JJ.

Mst. IRSHAD BEGUM & another--Petitioners

versus

GOVERNMENT OF PUNJAB & others--Respondents

W.P. No. 8708 of 2015/BWP, heard on 12.1.2017.

Punjab Civil Servants Act, 1974--

---S. 9--Constitution of Pakistan, 1973, Art. 212--Civil servant school teacher--Services were surrendered/relieved placed at disposal of D.O. education--Transfer--Terms and conditions of service--Maintainability--Matter in dispute relates to transfer and posting of petitioners which falls within preview of Section 9 of Punjab Civil Servants Act, 1974--It is now well-settled that Art. 212 of Constitution bars jurisdiction of High Court to entertain any matter which relates to terms and conditions of services of civil servants--Since petitioners are civil servants and matter in issue pertains to terms and conditions of their service, as such it is not tenable in constitutional jurisdiction of High Court owing to bar contained in Art. 212 of Constitution--Constitutional petition under Art. 199 of Constitution by a civil servant in relation to any matter connected with terms and conditions of service, in respect whereof service tribunal has jurisdiction, is not maintainable.

[Pp. 404 & 409] A & F

1985 SCMR 63, 1990 SCMR 999, 1992 SCMR 365, PLD 1994 SC 539, 1997 SCMR 167, 1997 SCMR 169, 1998 SCMR 60,

PLD 2004 SC 317, ref.

Punjab Civil Servants Act, 1974--

---S. 9--Civil servant--School teacher--Recommendation of headmistress--Transfer--Competent authority--Every civil servant is liable to serve anywhere within or outside province in any post under Government of Punjab or Federal Government or any Provincial Government or a local authority or a corporation or a body set up or established by any such Government, within contemplation of provisions of law--Office order surrendering/relieving services of petitioners, can be considered a recommendation of headmistress to competent authority and, thereafter, competent authority transferred petitioners for reasons recorded in impugned order. [P. 406] B

Constitution of Pakistan, 1973--

---Art. 199 & 212--Transfer of civil servant--Interim order--Right of appeal--Jurisdiction--Statute exercising a right of appeal from interim order could not be bypassed by bringing under attack such interim order in constitutional jurisdiction--Party effected thereto had to wait till it matures into final order and then to attack it in proper exclusive form--Under law, when final order cannot be interfered with by High Court, interference qua interim order will manifestly frustrate object of law and delay disposal of main case--Any forum or Court, which had no jurisdiction to decide main matter in a case before it, had no jurisdiction to decide any ancillary or incidental matter. [Pp. 406 & 407] C

1996 SCMR 1165, 2013 SCMR 338, 2000 PLC (CS) 118 &
2010 CLC 475, ref.

Up-gradation--

---Issue of up-gradation did not form part of terms and conditions of service of civil servants. [P. 407] D

Civil Servant--

---Transfer policy--Violation of fundamental rights--Petitioners cannot bypass service tribunal by adding a ground of assailing rules or violation of fundamental rights--Service tribunal is competent to adjudicate upon question of vires of rules framed by department, even if same were challenged on basis of violation of fundamental rights of civil servant. [P. 407] E

M/s. Bilal Ahmad Qazi, Jamshed Akhter Khokhar and Samina Qureshi, Advocates for Petitioners.

M/s. Malik Mumtaz Akhter, Additional Advocate General, Saeed Ahmad Chaudhry, Assistant Advocate General and Muhammad Yasin Ataal, Advocate for Respondents.

Date of hearing: 12.1.2017.

JUDGMENT

Muhammad Sajid Mehmood Sethi, J.--This consolidated judgment shall decide instant petition along with following connected petitions as common questions of law and facts are involved in these cases:--

1. W.P. No. 6606 of 2013/BWP titled *Hina Ashraf v. Government of Punjab & others*

2. W.P. No. 4895 of 2014/BWP titled *Syed Muhammad Nadeem Tahir v. District Coordination Officer, Rahim Yar Khan and others*
3. W.P. No. 9678 of 2015/BWP titled *Sardar Muhammad Aslam v. District Coordination Officer, Bahawalpur & others*
4. W.P. No. 9716 of 2015/BWP titled *Abdul Haq v. Secretary, School Education, Government of the Punjab & others*
5. ICA No. 31 of 2015/BWP titled *Farzana Kausar v. Executive District Officer (Education) Bahawalnagar & others*
6. W.P. No. 435 of 2016/BWP titled *Allah Bakhsh v. The District Coordination Officer, Bahawalpur & others*
7. W.P. No. 1279 of 2016/BWP titled *Naeem Rizwan v. Executive District Officer (Education), Bahawalnagar & others*
8. W. P. No. 1410 of 2016/BWP titled *Muhammad Hafeez v. Executive District Officer (Education), Bahawalnagar & others*
9. W. P. No. 1689 of 2016/BWP titled *Sameena Iqbal v. District Coordination Officer, Rahim Yar Khan & others*
10. W. P. No. 1991 of 2016/BWP titled *Shabana Sadiq v. Government of Punjab & others*
11. W. P. No. 2048 of 2016/BWP titled *Muhammad Afzal v. District Coordination Officer, Rahim Yar Khan & others*
12. W.P. No. 2089 of 2016/BWP titled *Muhammad Idrees v. District Coordination Officer, Rahim Yar Khan and others*
13. W.P. No. 2209 of 2016/BWP titled *Rana Shahid Mehmood v. District Coordination Officer, Bahawalnagar & others*
14. W.P. No. 3348 of 2016/BWP titled *Yousuf Ali & another v. The District Coordination Officer, Bahawalnagar & others*
15. W.P. No. 3674 of 2016/BWP titled *Liaquat Ali v. District Education Officer (S.E.) Bahawalpur & another*
16. W.P. No. 3716 of 2016/BWP titled *Mrs. Gulnaz Kausar v. Headmistress, Government Girls Elementary School, Tehsil Sadiq Abad & others*
17. W. P. No. 4588 of 2016/BWP titled *Muhammad Asif v. Government of Punjab & others*
18. W.P. No. 7202 of 2016/BWP titled *Jam Muhammad Rafique v. Government of Punjab & others*
19. W.P. No. 8527 of 2016/BWP titled *Muhammad Abdul Mujtaba Saeedi v. Executive District Officer (Education), Bahawalpur & others*
20. W.P. No. 8724 of 2016/BWP titled *Sardar Muhammad Aslam v. The District Coordination Officer, Bahawalpur and others*
21. W.P. No. 9239 of 2016/BWP titled *Mst. Rubina Shaheen v. Secretary, School Education, Government of Punjab and others*

2. Brief facts of the case are that petitioners were serving in Govt. Girls Elementary School, Chak No. 4/FW, Tehsil Chishtian, District Bahawalanagar (GGES), where Respondent No. 6 was the Headmistress. Respondent No. 6, on certain charges, passed order dated 18.09.2015, whereby services of petitioners were surrendered/ relieved from GGES and placed at the disposal of District Officer (Education), Bahawalnagar. On the complaint of teachers/staff members of GGES, an inquiry was conducted by District Education Officer (SE), Bahawalnagar, who recommended that petitioners as well as Respondent No. 6 be transferred from GGES, *vide* report dated 03.10.2015. Relying upon said report, District Coordination Officer, Bahawalnagar directed E.D.O. (Education) to transfer petitioners as well as the Headmistress against the seats mentioned against their names, *vide* order dated 20.10.2015, in compliance whereof, Executive District Officer, (Education), Bahawalnagar, approved the transfers of petitioners and Respondent No. 6, *vide* order dated 13.11.2015. Through instant petition, petitioners have assailed orders dated 18.09.2015, 20.10.2015 and 13.11.2015.

3. Learned counsel for petitioners submit that Respondent No. 6/ Headmistress, Govt. Girls Elementary School, Chak 4/FW, Tehsil Chishtian, is neither the appointing authority nor competent to relieve/surrender the petitioners. They further submit that the D.C.O./Respondent No. 2 stands nowhere in the scheme of law, hence, impugned orders are not sustainable in the eye of law. They add that petitioners have neither been served any Show

Cause Notice nor provided opportunity of personal hearing to them, which are conditions precedent as provided in Clause (b) of Para 4 (iii) of the Transfer Policy, 2013. They contend that transfer/surrender of teachers cannot be made on disciplinary or administrative ground except coupled with inquiry under the Punjab Employees Efficiency, Discipline and Accountability Act, 2006 (PEEDA). They argue that impugned orders are tainted with malice and have been passed during the ban on transfer of teaching staff. They further contend that terms and conditions of service are contained in Sections 3 to 21 of the Punjab Civil Servants Act, 1974. They add that "surrender and relieving" do not come within the purview of terms and conditions of service of a civil servant, therefore, the bar contained in Article 212 of the Constitution of the Islamic Republic of Pakistan, 1973 (the Constitution) does not apply in the instant matter. In support of their contentions, they have placed reliance upon *Regional Commissioner Income Tax, Northern Region, Islamabad and another v. Syed Munawar Ali and others* (2016 SCMR 859).

4. On the other hand, learned Law Officers, assisted by learned counsel for respondent, submit that petitioners have challenged their transfer and posting which relates to the terms and conditions of service, so, the matter may be agitated before the Punjab Service Tribunal, thus, these petitions are not maintainable. They add that petitioners were creating problems in GGES, as a result thereof they were transferred to different secondary schools of Tehsil Chishtian on administrative grounds in the interest of students of said school, by Respondent No. 2 being competent authority to transfer teachers serving in BPS-11 to BPS-18 within the district, as provided under Para 12 of the Transfer Policy, 2013. They further submit that this Court has no jurisdiction to entertain these petitions in view of the bar contained in Article 212 of the Constitution. In support of their contentions, they relied upon *Iqan Ahmed Khurram v. Government of Pakistan and others* (PLD 1980 Supreme Court 153), *Zahid Akhtar v. Government of Punjab through Secretary, Local Government and Rural Development, Lahore and 2 others* (PLD 1995 Supreme Court 530), *Khalid Mehmood Wattoo v. Government of Punjab and others* (1998 SCMR 2280), *Pervaiz Aslam v. Ilyas Hussain Shah and another* (1999 SCMR 784), *Peer Muhammad v. Government of Balochistan through Chief Secretary and others* (2007 SCMR 54), *Government of Sindh through Secretary Education and Literacy Department and others v. Nizakat Ali and others* (2011 SCMR 592), *Abdul Bari v. Government of Pakistan and 2 others* (PLD 1981 Karachi 290), *Khalil-ur-Rehman and others v. Government of Pakistan and others* (PLD 1981 Karachi 750) and *Nisar Ahmad v. Government of the Punjab and another* (1992 PLC (C.S.) 1020).

5. Arguments heard. Record perused.

6. Surrendering/relieving order dated 18.09.2015 passed by Headmistress, only provided basis for initiation of an inquiry in the matter and basing on inquiry report/recommendations, D.C.O. directed E.D.O. (Education) to transfer petitioners and Respondent No. 6 and ultimately, E.D.O. (Education), Bahawalnagar passed the transfer order dated 13-11-2015 transferring Respondent No. 6 as well as petitioners, which is reproduced below for ready reference:

"In compliance with the decision announced/passed on 20.10.2015 by the worthy District Coordination Officer Bahawalnagar in Writ Petition No. 7771 of 2015 titled *Irshad Begum etc VS DCO* whereby he is pleased to approve the following transfers of teachers on Administrative Grounds in public interest for the benefit of educational institute *i.e.* Govt. Girls Elementary School 4/FW, Chishtian with immediate effect.

Sr. No.	Name of Teacher with Designation & Place of Posting	Transferred/Posted at:	Remarks
1.	Mst. Nusrat Noor, SST/Head Teacher Govt. Girls E/S 4/FW, Chishtian	As SST (G) Govt. Girls H/SS Dahrnwala Tehsil Chishtian	Against Vacant Post
2.	Mst. Irshad Begum, EST Govt. Girls E/S 4/FW, Chishtian	As EST at Govt. Girls H/S 95/F (S) Tehsil Chishtian	Against Vacant Post
3.	Mst. Zahida Nazir, PST Govt. Girls E/S 4/FW, Chishtian	As PST at Govt. Girls H/S 123/M, Chishtian	Against Vacant Post

DEO (EE-W) & DEO (SE) Bahawalnagar are directed to ensure compliance of these orders accordingly and put up proposals of vigilant teachers for adjustment against the resultant vacancies at Govt. Girls Elementary School 4/FW, Chishtian. Furthermore, all the above mentioned transferred teachers are strictly WARNED to be careful in future."

7. Perusal of the impugned order shows that matter in dispute relates to transfer and posting of the petitioners which falls within the preview of Section 9 of the Punjab Civil Servants Act, 1974. It is now well-settled that Article 212 of the Constitution bars the jurisdiction of this Court to entertain any matter which relates to the terms and conditions of services of civil servants. Since petitioners are civil servants and the matter in issue pertains to the terms and conditions of their service, as such it is not tenable in the constitutional jurisdiction of this Court owing to the bar contained in Article 212 of the Constitution. Reference in this regard can be made to *Muhammad Sadiq Khokhar v. Engineer-in-Chief Pakistan Army, G.H.Q. and another* (1985 SCMR 63), *Rana Muhammad Sarwar v. Government of Punjab through Services, General Administration and Information Department and another* (1990 SCMR 999), *Imam Bakhs and 4 others v. Deputy Commissioner, Layyah and 16 others* (1992 SCMR 365), *Muhammad Anis and others v.*

Abdul Haseeb and others (PLD 1994 Supreme Court 539), *Miss Rukhsana Ijaz v. Secretary, Education, Punjab and others* (1997 SCMR 167), *Ayyaz Anjum v. Government of Punjab, Housing and Physical Planning Department through Secretary and others* (1997 SCMR 169), *Habib Bank Limited and others v. Syed Zia-ul-Hassan Kazmi* (1998 SCMR 60), *Province of Punjab and another v. Ch. Muhammad Ashraf and another* (2000 PLC (C.S.) 118) and *Government of the Punjab and others v. Muhammad Zafar Bhatti and others* (PLD 2004 Supreme Court 317). This Court is not supposed to entertain and adjudicate such dispute due to bar contained under Article 212 of the Constitution, and law laid down by the Hon'ble Supreme Court in *Ali Azhar Khan Baloch and others v. Province of Sindh and others* (2015 SCMR 456), the operative part of which is reproduced as under:--

“149. Article 212 of the Constitution ousts the jurisdiction of High Courts and civil Courts in respect of the matters pertaining to terms and conditions of civil servants. In other words, the provisions of Article 212 do not confer a concurrent jurisdiction to civil Courts, High Courts and Tribunals. The ouster contemplated under the said Article is a Constitutional command, and, therefore, of necessity restricts the jurisdiction of civil Courts and High Courts on the subject, which squarely falls within the exclusive domain of Tribunals.

150. The High Court of Sindh has completely overlooked the intent and spirit of the Constitutional provisions relating to the terms and conditions of service, while entertaining Civil Suits and constitution petitions filed by the civil servants, which are explicitly barred by Article 212. The expression 'Terms and Conditions' includes transfer, posting, absorption, seniority and eligibility to promotion but excludes fitness or otherwise of a person, to be appointed to or hold a particular post or to be promoted to a higher post or grade as provided under Section 4(b) of the Sindh Service Tribunals Act, 1973. Surprisingly, it has been ignored that it is, by now, a settled principle of law that the civil and writ jurisdictions would not lie in respect of the suits or petitions filed with regard to the terms and conditions of Civil Servants, and yet some of the learned Judges of High Court of Sindh have erroneously exercised both civil and writ jurisdictions with regard to the terms and conditions of civil servants.

151. We, for the aforesaid reasons, conclude that the exercise of jurisdiction by way of suit and Constitution petition filed by a civil Servant with regard to his terms and conditions of service is violative of Articles 175, 212 and 240 and the law.”

8. Learned counsel for petitioners has argued that impugned orders under challenge, having been passed without lawful authority, are without jurisdiction and based on *mala fide*, but despite accepting it legally correct, the bar under Article 212 of the Constitution restricts this Court from taking cognizance of the matter. Reference in this regard can be made to the cases of *Khalid Mehmood Wattoo and Muzaffar Hussain supra*. Even the plea of *mala fide* does not confer upon this Court jurisdiction to act in the matter as Service Tribunal is the appropriate forum, having full jurisdiction to interfere in such like matters.

9. The next argument of learned counsel for petitioners that terms and conditions of a civil servant are defined in Sections 3 to 21 of the Punjab Civil Servants Act, 1974 (the Act of 1974), which do not include “surrender and relieving”, is misconceived. In terms of Section 9 of the Act of 1974, every civil servant is liable to serve anywhere within or outside the province in any post under the Government of the Punjab or the Federal Government or any Provincial Government or a local authority or a corporation or a body set up or established by any such Government, within the contemplation of said provisions of law. Office order dated 18.09.2015, surrendering/relieving services of the petitioners, can be considered a recommendation of Headmistress to the competent authority and, thereafter, the competent authority transferred the petitioners for the reasons recorded in the impugned order. Reference can be made to judgment passed in the case titled *Pathan v. The State* (2015 SCMR 315) wherein Hon'ble Supreme Court of Pakistan observed that head teacher had no authority to transfer a teacher of his school to another, but he can only recommend his transfer to the Education Officer of the District. Initial recommendation of Headmistress stood merged in the final order passed by the competent authority and is no more in field under the doctrine of merger. Reference can be made to *Sahabzadi Maharunisa and another v. Mst. Ghulam Sughran and another* (PLD 2016 SC 358). Initial or final order, whether illegal, without jurisdiction and *corum non jure*, remedy still lies before the Service Tribunal on account of bar contained in Article 212 of the Constitution. Therefore, office order dated 18.09.2015, surrendering/relieving services of the petitioners, cannot be assailed through constitutional petition under Article 199 of the Constitution.

10. Even otherwise, statute exercising a right of appeal from interim order could not be bypassed by bringing under attack such interim order in constitutional jurisdiction. Party effected thereto had to wait till it matures into final order and then to attack it in proper exclusive form. Under the law, when final order cannot be interfered with by this Court, interference *qua* interim order will manifestly frustrate the object of law and delay the disposal of main case. Any forum or Court, which had no jurisdiction to decide the main matter in a case before it, had no jurisdiction to decide any ancillary or incidental matter thereto. Reference, in this regard, is made to *Syed Saghir Ahmad Naqvi v. Province of Sindh through Chief Secretary, S & GAD Karachi and another* (1996 SCMR 1165), *S.M. Waseem Ashraf v. Federation of Pakistan through Secretary M/O Housing and Works, Islamabad and others* (2013 SCMR 338), *Province of Punjab and another v. Ch. Muhammad Ashraf and another* (2000 PLC (C.S.) 118), *Muzaffar Hussain v. The Superintendent of Police, District Sialkot* (2002 PLC (C.S.) 442) and *Osman Khan through Attorney v. Aisha Naz and 2 others* (2010 CLC 475).

11. Undeniably, the issue of upgradation did not form part of terms and conditions of service of civil servants as held by the Hon'ble Supreme Court in the case of *Syed Munawar Ali and others supra*, relied upon by the

petitioners, but it has not been shown that the matter relating to transfer/posting/placement/repatriation/surrender does not come within the ambit of terms and conditions of service.

12. It needs to be emphasized that even any matter connected with the terms and conditions of service is also barred under the said provisions of the Constitution. The said ouster clause creates a bar with regard to all the matters falling within the ambit of authority of Service Tribunal. Even the vires of the rules on the plea of alteration of terms and conditions of service can be challenged before the Service Tribunal and bar of Article 212 of the Constitution in such case is applicable with full force. Petitioners cannot bypass Service Tribunal by adding a ground of assailing rules or violation of fundamental rights. The Service Tribunal is competent to adjudicate upon the question of vires of rules framed by the department, even if the same were challenged on the basis of violation of fundamental rights of the civil servant. As in the instant case, the Transfer Policy, 2013 has been challenged in some of the petitions, such rules/notification could be termed as an order within the contemplation of the provisions of the Punjab Service Tribunals Act, 1974 and could be challenged in appeal before the Service Tribunal. Reference, in this regard, is made to *Iqan Ahmed Khurram v. Government of Pakistan and others* (PLD 1980 Supreme Court 153), *I. A. Sharwani and others v. Government of Pakistan through Secretary, Finance Division, Islamabad and others* (1991 SCMR 1041), *Ms. Anyesha Bashir Wani and others v. Government of Pakistan and others* (2012 PLC (C.S.) 31), *Muhammad Asghar v. Government of Balochistan through Chief Secretary Balochistan and 6 others* (2012 PLC (C.S.) 142), *Abdul Khaliq v. Government of Balochistan through Chief Secretary, Civil Secretariat and 3 others* (2012 PLC (C.S.) 1211) and *Engineer Musharaf Shah v. Government of Khyber Pakhtunkhwa through Chief Secretary and 2 others* (2015 PLC (C.S.) 215).

13. In somewhat identical matter, the learned Division Bench of this Court in *Fazal Ahmad Ranjha and 28 others v. Government of the Punjab through Secretary Education (Schools), Lahore and 39 others* [2016 PLC (C.S.) 1209], in the matter of transfer, posting and placement, has ruled as under:

"15. Keeping in view the aforementioned it is held that appellants are civil servants and were transferred/posted/placed as DTEs through different orders. Transfer/posting/placement is part of their terms and conditions of service. Therefore, in case they have been sent back/transferred/posted/ repatriated, they cannot assert any right before this Court in view of the bar contained in Article 212 of the Constitution of the Islamic Republic of Pakistan. We are guided by the dictum laid down by the Honourable Supreme Court of Pakistan in judgments reported as *Secretary to Government of the Punjab Health Department, Lahore and others vs. Dr. Abida Iqbal and another* (2009 SCMR 61), *Peer Muhammad vs. Government of Balochistan through Chief Secretary and others* (2007 SCMR 54), *Syed Mazher Hussain Bukhari vs. Secretary, Government of Punjab, Local Government and Rural Development, Department, Lahore and others* (1998 SCMR 1948), *Asadullah Rashid vs. Haji Muhammad Muneer and others* (1998 SCMR 2129) and *Khalid Mahmood Wattoo vs. Government of Punjab and others* (1998 SCMR 2280).

16. Apart from dealing with the question of transfer/posting of a civil servant, the Honourable Apex Court in the aforementioned judgments has dealt with the question that even if an order passed by a departmental authority qua terms and conditions of service of a civil servant is *mala fide, coram non iudice, ultra vires* or without jurisdiction, this Court has no mandate to look into or decide about the vires of such an order.

17. While discussing the bar contained in Article 212 of the Constitution, the Honourable Supreme Court of Pakistan has held in unequivocal and clear terms that the bar is absolute in view of the fact that under the aforementioned Article, respective Service Tribunals have been constituted to adjudicate upon and decide exclusively about the matters and issues pertaining to terms and conditions of service of a civil servants. Therefore, resort to this Court by invoking Article 199 of the Constitution of the Islamic Republic of Pakistan cannot be made. The words in which Article 212 of the Constitution is couched, gives it an overriding effect over the other Articles qua the terms and conditions of service, whereas the jurisdiction exercised under Article 199 being subject to the Constitution would be ousted insofar as the terms and conditions of services of a civil servant are concerned. Reliance can be placed on the judgments reported as "*Ali Azhar Khan Baloch and others v. Province of Sindh and others* (2015 SCMR 456) and *National Assembly Secretariat v. Manzoor Ahmed and another* (2015 SCMR 253)."

14. Needless to observe here that underlying object of incorporation of Article 212 in the Constitution and establishment of Service Tribunal by legislation was to provide expeditious and inexpensive remedy to civil servants for redressal of their grievances arising out of violation of terms and conditions of their service. Establishment of Service Tribunal aimed at prevention of intrusions into or inroad on terms and conditions of civil servants by departmental authorities. Unlike constitutional jurisdiction of this Court under Article 199 of the Constitution confined to question of law without venturing upon resolution of factual controversies, it was within the jurisdiction of Service Tribunal and it was its obligation to decide all questions of law and facts raised by petitioners in instant petitions. Civil servants could be transferred/surrendered/posted/ repatriated during period of service anywhere, which would fall under terms and conditions of service or matters connected therewith and jurisdiction of this Court, under Article 212 of the Constitution, is explicitly barred. Case of petitioners fall within the ambit of Transfer Policy which, for all intents and purposes, forms part of terms and conditions of their service or matters connected therewith. Constitutional petition under Article 199 of the Constitution by a civil servant in relation to any matter connected with the terms and conditions of service, in respect whereof Service Tribunal has jurisdiction, is not maintainable in view of the provisions of Article 212 *ibid*. Reference can be made to case of *Pervaiz Aslam supra*.

15. In view of above, this petition as well as connected petitions, being not maintainable, are hereby dismissed with no order as to costs.

(A.) Petitions dismissed

108

①

109

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA JUDICED
SERVICES TRIBUNAL PESHAWAR**

KPST
Peshawar

Restoration Application No. 681/2022

Mr. Inamullah S/o TAJ Muhammad ADEO
Establishment Office of the DEO (M) Peshawar.

Petitioner/ Appellant

Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Diary No. 1953

The Chief Secretary Khyber Pakhtunkhwa Peshawar & 15-11-2022
others

Respondents

**APPLICATION FOR RESTORATION
OF THE CAPTIONED APPEAL NO.
1335/2019.**

Respectfully Sheweth;

1. That the above mention appeal was pending adjudication before this Hon'ble Tribunal and has been dismissed for non-prosecution vide impugned order dated: 17/10/2022.
 2. That the Petitioner/Appellant on each and every date appear and attended this Hon'ble Tribunal in the instant Appeal regularly by himself or through counsel, but on 17/10/2022 Petitioner/Appellant counsel did not appear before this Hon'ble Tribunal due to having being out of station and the and Petitioner/Appellant was ill.
 3. That as the counsel for the Petitioner/Appellant did not appeared due to the aforementioned reason, therefore, he was totally unaware of fact that the case was
- BZ

(D) 110

dismissed in default on 17/10/2022. (Copy of Order dated 17/10/2022 is attached)

4. That the counsel for the Petitioner came to know regarding the said order on 25/10/2022.
5. That on the fateful day the non attendance of the counsel for the Petitioner/Appellant was not intentional nor deliberate but due to the above mentioned facts, which is beyond control of the counsel.

It is, therefore, humbly prayed that on acceptance of the instant petition, the captioned appeal may graciously be restored and be decided on merits.

Dated: 15/11/2022

Manzoor
Petitioner/ Appellant

Through

Naila Jan
Advocate, High Court
Peshawar.

3

111

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

Mr. Inamullah

VERSUS

Government of Khyber Pakhtunkhwa & Others

AFFIDAVIT

I, **Naila Jan Advocate High Court Peshawar**, do hereby solemnly affirm & declare on oath that all content of the instant Petition, are true & correct to the best of my knowledge & belief and nothing has been concealed or misstated from this Hon'ble Tribunal.

Inamullah

DEPONENT

ATTESTED

15-11-2022

Identified BY

Naila Jan

Naila Jan
Advocate, High Court
Peshawar



112

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**



Appeal No. 1335/2019

Inamullah S/o Taj Muhammad, ADEO Establishment
Office of the DEO (M) Peshawar.

-----**(Appellant)**

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1284

Dated 19/9/2019

VERSUS

1. The Chief Secretary Khyber Pakhtunkhwa Peshawar.
2. The Chairman Public Service Commission.
3. The Secretary Elementary & Secondary Education Khyber Pakhtunkhwa.
4. The Director Elementary & Secondary Education Khyber Pakhtunkhwa.
5. The Secretary, Public Service Commission.
6. The Executive District Officer, Peshawar.
7. Zia-ur-Rehman S/o Said Rehman ADEO, Peshawar at Serial No. 78 in the Seniority List. Posted at the office of DEO Peshawar.
8. Ihtisham Ul Haq S/o Fazal Haq ADEO at Serial No.79 posted at the office of DEO Malakand.
9. Rahim Khan S/o Hussain Khan at R/o ADEO at Serial No. 80, posted at office of the DEO Peshawar.
10. Muhammad Saleem S/o Ghulam Sarwar, ADEO at Serial No.81, posted at the office of DEO Peshawar.
11. Sikandar Irfan S/o Faizullah Khan ADEO, at Serial No.82, posted at the office of DEO D.I.Khan.
12. Abdul Hafeez S/o Abdul Rashid ADEO, at Serial No. 83, posted at the office of DEO D.I.Khan.
13. Shah Jehan S/o Gul Rahim Khan, ADEO, at Serial No. 84,
14. Ishtiaq Ahmed Khan S/o Muhammad Akram Khan, ADEO at Serial No. 85, posted at the office of DEO Abbottabad.
15. Mati Ullah Khan S/o Darawez Khan, ADEO at Serial No. 86, posted in the office of DEO D.I.Khan.
16. Shabbir Ahmad S/o Qazi Fazli Hanan ADEO, at Serial No. 87, posted at the office of DEO D.I.Khan.
17. Jamshed Khan S/o Mehmood Khan ADEO, at Serial No. 88, posted at the office of DEO Charsadda.
18. Riaz Khan S/o Mir Zali Khan ADEO, at Serial No. 89, posted at the office of DEO Bannu.
19. Rajab Ali S/o Mir Qadam Khan, ADEO at Serial No. 90, posted at the office DEO Bannu.

Certified to be true copy

EX-AMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Filed to-day

Registrar

19/9/19

Re-submitted to-day
and filed.

Registrar

19/9/19

5

113



17.10.2022

Nemo for the appellant. Mr. Mehtab Gul, Law Officer alongwith Mr. Naseer-ud-Din Shah, Assistant Advocate General for official respondents present.

The appeal in hand was called on for hearing after various intervals, however none appeared on behalf of the appellant till the closing time, therefore, the appeal in hand stands dismissed in default. Parties are left to bear their own costs. File be consigned to the record room.-

ANNOUNCED
17.10.2022

(Mian Muhammad)
Member (Executive)

(Salah-Ud-Din)
Member (Judicial)

Certified to be true copy
EXAMINED
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Date of Presentation of Application 25/10/22
Number of ~~Words~~ Pages - 2 page
Copying Fee 10/-
Urgent —
Total 10/-
Name of Copyient —
Date of Completion of Copy 08/11/22
Date of Delivery of Copy 14/11/22

بعد الت ضا۔ ہا کہوں سر قبول شامہ



Petition
22ء 2 منجانب
انفا اللہ بنام edu

مورخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب وہی وکل کاروائی متعلقہ

آن مقام لٹیاہ کیلئے ناکہ جانہ

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

20 22ء

ماہ نومبر

15

المرقوم

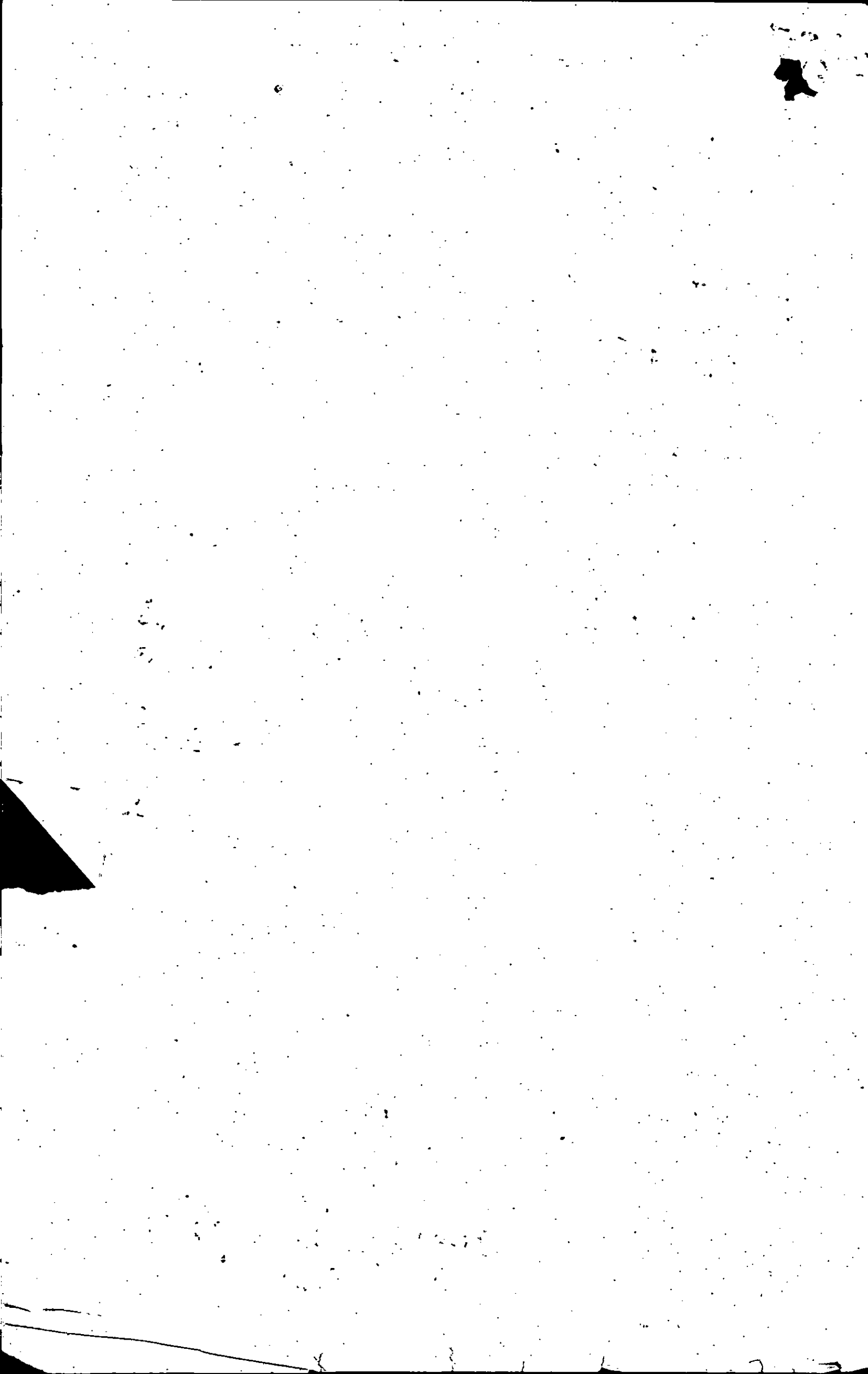
واہ العبد

العبد

Attested

Accepted

Date



D

115

SCANNED
KPST
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Misc. Application No 262/2024

In

Service Appeal No: 1335/2019

Khyber Pakhtunkhwa
Service Tribunal

Case No. 11890

Date 25-03-2024

Inam Ullah S/o Taj Muhammad, ADEO, Establishment
Office of the DEO (M), Peshawar.

.....Appellant

Versus

1. The Chief Secretary Khyber Pakhtunkhwa, Peshawar.
2. The Chairman Public Service Commission.
3. The Secretary Elementary & Secondary Education,
Khyber Pakhtunkhwa.
4. The Director Elementary & Secondary Education,
Khyber Pakhtunkhwa.
5. The Secretary, Public Service Commission.
6. The Executive District Officer, Peshawar.

.....Respondents

APPLICATION FOR RESTORATION OF
THE CAPTIONED APPEAL DISMISSED IN
DEFAULT VIDE IMPUGNED ORDER
DATED 24-10-2023.

Respectfully Sheweth;

1. That the above captioned Appeal was pending adjudication before this Hon'ble Tribunal and the same was dismissed for non-prosecution vide impugned order dated: 24-10-2023. (Attested Copy of the relevant Order Sheet is attached herewith)
2. That the captioned Appeal was fixed for 24-10-2023 and due to the serious illness ie. Brain Tumor of mother of the counsel, after

2

116

the thorough surgery, she wasn't able to sustain, and died, thus was unable to attend the same of the date fixed and also on the fixed date the appellant was abroad and was not able to attend the same.

3. That the absence on 24-10-2023 was not intentional or deliberate, rather due to above mentioned valid reason.
4. That it is the prime objective of the law & justice to decide the cases on merit and to avoid technicalities while valuable rights of the applicant/ appellant is attached with the said Appeal.
5. That the instant application is well within time, while this Hon'ble Tribunal has got ample powers to accept the instant application.

It is, therefore, humbly prayed that on acceptance of the instant application, the captioned Appeal may graciously be restored and be decided on merits after due adjudication.

Dated: 25-3-2024



Affidavit: COURT

Applicant/ Appellant
 Through
 Naila Jan Advocate
 Supreme Court of
 Pakistan

Naila Jan Advocate
ASE

I, (Naila Jan Advocate, attorney for the Applicant/ Appellant) do hereby solemnly affirm & declare on oath that, contents of the foregoing application are true & correct to the best of knowledge & belief and nothing has been concealed from this Hon'ble Tribunal.

DEPONEE

Naila Jan Advocate
 DEPONEE

(3) 117



**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

Appeal No- 1335/2019

Inamullah S/o Taj Muhammad, ADEO Establishment
Office of the DEO (M) Peshawar.

-----*(Appellant)*

VERSUS

1. The Chief Secretary Khyber Pakhtunkhwa Peshawar.
2. The Chairman Public Service Commission.
3. The Secretary Elementary & Secondary Education Khyber Pakhtunkhwa.
4. The Director Elementary & Secondary Education Khyber Pakhtunkhwa.
5. The Secretary, Public Service Commission.
6. The Executive District Officer, Peshawar.
7. Zia-ur-Rehman S/o Said Rehman R/o Village Babu Garhi, P.O Kababyan, Warsak Road, Peshawar at Serial No. 78 in the Seniority List.
8. Ihtisham Ul Haq S/o Fazal Haq R/o Mohallah Shabakhel Dheri Allahdhand, District Malakand at Serial No.79
9. Rahim Khan S/o Hussain Khan at R/o Vill: & P.O Surigzai Payan, Mohallah Mamkhede, District & Tehsil Peshawar, R/o Vill & P.O Surigzai Payan Distt & Tehsil Peshawar Mohallah Yousaf Khel at Serial No. 80
10. Muhammad Saleem S/o Ghulam Sarwar R/o H.No 1316/A Mohallah Hafiz Jamal Dera Ismail Khan, at Serial No.81
11. Sikandar Irfan S/o Faizullah Khan R/o Hashim Town near Baran Abad Kheikh Yousaf Road D.I Khan, at Serial No.82
12. Abdul Hafeez S/o Abdul Rashid H. No. 587-1-A, Tabkhi Street, D. I. Khan at Serial No. 83
13. Shah Jehan S/o Gul Rahim Khan R/o at Serial No. 84
14. Ishtiaq Ahmed Khan S/o Muhammad Akram Khan R/o Vill: Dhodial Nawan Shehr distt: Abbottabad at Serial No. 85

Certified to be true copy

[Signature]
Khyber Pakhtunkhwa
Services Tribunal
Peshawar
29-2-24

Service Appeal No. 1335/2019

118

Inamullah vs Govt




ORDER
24.10.2023


Nemo for the appellant. Mr. Muhammad Jan, District Attorney for the respondents present.

The appeal in hand was called on for hearing after various intervals, however nobody put appearance on behalf of the appellant till rising of the court, therefore, the appeal in hand stand dismissed in default. Parties are left to bear their own costs. File be consigned to the record room.

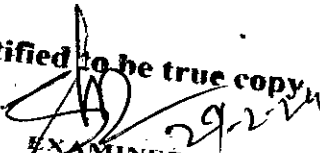
Service Appeal
O.P. No. 2
24.10.2023

ANNOUNCED
24.10.2023


(Muhammad Akbar Khan)
Member (Executive)


(Salah-ud-Din)
Member (Judicial)

Naeem Amin

24.10.2023
Certified to be true copy

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 26-2-2024
Number of Words Page 2 2
Copying Fee 10/-
Urgent _____
Total 10/-
Name of Copyist Shahid
Date of Completion of Copy 29-2-2024
Date of Delivery of Copy 29-2-2024