


FORM OF ORDER SHEET

Court of _____

Appeal No. 909/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/07/2024	<p>The appeal of Mst. Zeenat Ara re-filed today by registered post through Mr. Qudratullah Khan Gandapur Advocate. It is fixed for preliminary hearing before touring Single Bench at Bannu on 21.08.2024. Counsel for the appellant has been informed telephonically.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

TO:

The Registrar,
KP Service Tribunal

With reference to your No.114/Inst./2024/KPST dated
04.06.2024 the appeal is re submitted after:

1. Deletion of unnecessary party.
2. Addresses of respondents No. 3 to 8 have been added.
3. Copy of Departmental Appeal is attached.



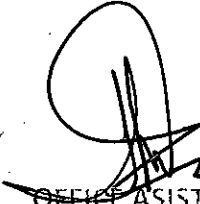
Qudratullah Khan Gandapur
Advocate Supreme Court

The appeal of Mst. Zeenat Ara received today i.e on 04.06.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent no.9 is un-necessary/improper party, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondent.
- 2- Addresses of the respondent no. 3 to 8 are incomplete be completed according to rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 3- Copy of departmental appeal is not attached with the appeal be placed on it.

No. 114 /Inst./2024/KPST,

Dt. 4/6 /2024.


OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Qudratullah Khan Gandapur Adv.
High Court D.I.Khan.

BEFORE THE HONOURABLE KHYBER PAKHTUNKHA
SERVICE TRIBUNAL, PESHAWAR

in FSV
in view of

KHWA

Service Appeal No. 409 of 2024

Mst. Zeenat Ara

Vs.

Director Elementary & Secondary Education etc
SERVICE APPEAL

APPLICATION FOR EXTENSION OF TIME FOR RE-
SUBMISSION OF THE APPEAL.

Respectfully Sheweth,

1. That the above titled appeal was filed by appellant before this Honourable Tribunal within time but the same was returned, via post office, with certain objections on 04.06.2024 for re-submission within fifteen days.
2. That the mail was delivered to the to the counsel for appellant on 14.06.2024 and thereafter, there were holidays for Eid-ul-Azha, and addresses of respondents could not be located, therefore, resubmission of appeal if delayed, in the opinion of this Honourable Tribunal, then the same may please be condoned and time may please be extended so that the appeal after re-submission may be considered as within time.

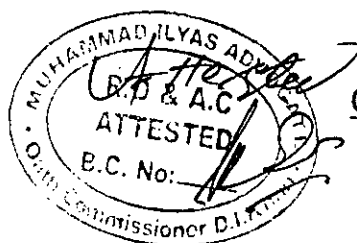
Zeenat Ara
Yours Humble Appellant
(Mst. Zeenat Ara)
Through Counsel

QAS
ASC

Dt. 27-6-2024

Qudratullah Khan Gandapur
Advocate Supreme Court.

AFFIDAVIT I, the Appellant through counsel, do hereby solemnly affirm and declare on oath that all the Para-wise contents of this petition are true & correct to the best of my knowledge and belief and nothing has been deliberately concealed from this Honourable Court.



QAS
ASC

DEPONENT
Qudratullah Khan Gandapur ASC

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No. 909 of 2024

Mst. Zeenat Ara

Vs.

Director Elementary & Secondary Education etc
SERVICE APPEAL

S#	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE NO.
1.	Service Appeal	---	1-7
2.	Copy of the Appointment Order bearing No.736-42 dated 06.03.2010	A	8-9
3.	Copy of the Final Seniority list of CT/Sr. CT Female in NWTD	B	10-13
4.	Copy of Departmental Appeal	C	14-17
5.	Copy of letter No.1016 dated 16.01.2024, as signed on 26.02.2024	D	18-19
6.	Vakalatnama	---	20

Yours Humble Appellant


Zeenat Ara
(Mst. Zeenat Ara)
Through Counsel

Dt. 27-06, 2024


Qudratullah Khan Gandapur
Advocate Supreme Court.

Resped Set,

The original contains a copy, while, the remaining eight copies of the Respondents have been placed in the separate file cover, annexed with the original.


Mst. Zeenat Ara

27/06/2024

BEFORE THE HONOURABLE KHYBER

SERVICE TRIBUNAL PESHAWAR

JNKHWA

Appeal

Service Appeal No. 909 of 2024.


Mst. Zeenat Ara, Daughter of Lajmir Khan, Certified Teacher (CT),
Government Girls High School Samandar Khan Kot, Tehsil Miran Shah, District
North Waziristan.

Appellant

VERSUS

1. Director, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
2. District Education Officer (Female), District North Waziristan.
3. Mst. Rifat Begum Daughter of Mir Dar Ali Khan SST Govt Girls Middle School Sharif Ullah Kot Muhammad Khel District North Waziristan.
4. Mst. Nagina Daughter of Taza Din SST Govt Girls High School Muhammad Amin Kot Shawa District North Waziristan.
5. Mst. Shazia Daughter of Inayat Ullah Senior CT (Sr CT) Govt Girls High School Pir Aqal Zaman Kot Mubarak Shahi District North Waziristan.
6. Mst. Farah Naz, Daughter of Zarnullah Khan SST Govt Girls High School Samandar Khan Kot Dandy Darpa Khel District North Waziristan.
7. Mst. Gul Naz Bashir Daughter of Bashir Ahmad Govt Girls High School Samandar Khan Kot Dandy Darpa Khel District North Waziristan.
8. Mst. Nabila Akbar Daughter of Akbar Khan Govt Girls High School Sarai Bazar Miranshah district North Waziristan.

Respondents

 SERVICE APPEAL UNDER SECTION 4 OF THE **K.P.K**
SERVICE TRIBUNALS ACT, 1974, AGAINST REJECTION
ORDER OF HER **DEPARTMENTAL APPEAL** FOR ONE
STEP PROMOTION, COMMUNICATED VIDE LETTER **NO.**
1016 DATED **16.01.2024**, SIGNED BY THE ASSISTANT
DIRECTOR (ESTAB) ON **26.02.2024** AND FOR ISSUANCE

OF DIRECTION TO RESPONDENTS TO AWARD PROMOTION TO THE APPELLANT TO THE POST OF SENIOR CT ON THE BASIS OF SENIORITY, WITH RETROSPECTIVE EFFECT/DATE.

NOTE: THE IMPUGNED LETTER No.1016 DATED 16.01.2024, SIGNED BY THE ASSISTANT DIRECTOR (ESTAB) ON 26.02.2024, RECEIVED TO THE APPELLANT (UNOFFICIALLY) ON 22.05.2024 AND THUS, THIS APPEAL IS BEING FILED, HOWEVER, OFFICIALLY THE COPY OF SAID LETTER HAS NOT BEEN SENT TO THE APPELLANT.

PRAYER:

ON ACCEPTANCE OF PRESENT SERVICE APPEAL AND BY SETTING ASIDE LETTER No.1016 DATED 16.01.2024, RESPONDENTS MAY PLEASE BE DIRECTED TO AWARD PROMOTION TO THE APPELLANT TO THE POST OF SR. CT ON THE BASIS OF SENIORITY W.E.F. THE DATE OF AWARD OF PROMOTION TO HER JUNIORS, WITH ALL FRINGE BENEFITS; WITH SUCH OTHER RELIEF AS MAY BE DEEMED PROPER AND APPROPRIATE BY THIS HONOURABLE TRIBUNAL IN THE ATTENDING CIRCUMSTANCES OF THE CASE, PARTICULARLY WHEN RESPONDENTS NO.3 TO 8 HAVE FURTHER BEEN PROMOTED.

Respectfully Sheweth,

1. That the appellant has been serving in the Education Department North Waziristan on the post of Certified Teacher (CT) w.e.f. 06.03.2010 as she was appointed as such vide Appointment Order bearing No.736-42 dated 06.03.2010. Respondents No.3 to 8 were also appointed as CT on 06.03.2010 on the basis of same appointment order like petitioner but they, in the order of appointment, are juniors than the appellant. Copy of the Appointment Order bearing No.736-42 dated 06.03.2010 is enclosed as Annexure A.

2. That the official respondents, secretly and without the knowledge of appellant, promoted respondents No.3 to 8 and so many other junior CT to the post of Senior CT in preference to the appellant by ignoring her seniority. Presently said respondents have further been promoted on the basis of same seniority.
3. That the appellant was not in the knowledge of promotion of her juniors to the post of Sr. CT and she got knowledge of the said fact from Final Seniority list of CT/Sr. CT Female in NWTD, wherein, her junior teachers have been awarded promotion and she was wrongfully deprived on the pretext of "Service Book Required" despite the fact that service book always remain in the custody of Department. Copy of the Final Seniority list of CT/Sr. CT Female in NWTD is enclosed as **Annexure B**.
4. That on getting knowledge of the illegal deprivation from the due right of promotion to the post of Sr. CT, the appellant preferred a departmental appeal (**Annexure C**) to the Director, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, which was rejected by the respondent No.1 and result thereof was communicated to respondent No.2 vide letter No.1016 dated 16.01.2024, as signed on 26.02.2024 (**Annexure D**), however, no copy was addressed or officially communicated to the appellant by any of the respondents. The appellant got knowledge of the impugned letter on 22.05.2024, hence, from the date of knowledge this appeal is well within time.
5. That respondent No.2 despite repeated requests of appellant has not provided her the promotion orders of her junior officials, however, the factum of their promotion is evident from the joint seniority list.
6. That aggrieved of the impugned letter No.1016 dated 16.01.2024, as signed on 26.02.2024 and also discontented with illegal deprivation of promotion to the post of Sr. CT, the appellant has been left with the only remedy to invoke the jurisdiction of this Honourable Tribunal

through the present appeal with the *supra* prayer on, inter alia, the following grounds:

GROUND:

- i. That non award of promotion to the appellant to the post of Senior CT despite seniority & eligibility, and the impugned letter No.1016 dated 16.01.2024, are highly unjust, illegal, unlawful, and result of misfeasance of respondents.
- ii. That it is evident from the appointment letter dated 06.03.2010 and also from the joint Seniority list of CT/Sr. CT that the appellant is senior than respondents No.3 to 8 and many more, who despite being juniors have been promoted to the post of Sr. CT in preference to the petitioner illegally, unlawfully and unjustifiably. Now they have further been promoted. Hence, a great injustice has been done to the appellant.
- iii. That the seniority of a Civil Servants is to be reckoned in the manner prescribed in the Rule 17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, which runs as under:


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

- (a) in the case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission or as the case may be, the Departmental Selection Committee; provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a later selection; and
- (b) in the case of civil servants appointed otherwise, with reference to the date of their continuous regular appointment in the post; provided that civil servants selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter se seniority as in the lower post.

Explanation-I:- If a junior person in a lower post is promoted to a higher post temporarily in the public interest, even though continuing later permanently in the higher post, it would not adversely effect the interest of his seniors in fixation of his seniority in the higher post.

Explanation-II:- If a junior person in a lower post is promoted to a higher post by superseding a senior person and subsequently that senior person is also promoted the person promoted first shall rank senior to the person promoted subsequently; provided that junior person shall not be deemed to have superseded a senior person if the case of the senior person is deferred for the time being for want of certain information or for incomplete record or for any other reason not attributing to his fault or demerit.

Hence, it is clear from the above extracted provision that the appellant due to holding superior rank that respondents No. 3 to 6 in her first appointment order in the Cadre/Post of CT and also because of her appointment earlier than the respondents No. 7 & 8 and so many others, is very much senior. Hence, she is entitled to promotion from the date of promotion of her juniors on the post of Sr. CT and in preference to her juniors, with all back benefits.

- 
- iv. That the promotion to the post of Sr. CT was a vested right of appellant owing to her seniority, eligibility and she by all means is/was very much entitled to be promoted to the post of Sr. CT in preference to respondents No.3 to 8 and many others. Thus, depriving the appellant from her due right of promotion is a wanton aggression upon rights of the appellant.
 - v. That respondent No.2 despite repeated requests of appellant has not provided her the promotion order of her junior officials, however, the factum of their promotion is evident from the joint seniority list.
 - vi. That from the joint seniority list, this fact is apparent that the appellant was deprived of her due right of promotion on the pretext "Service Book Required"; whereas, there can be no denial of the fact that maintaining and keeping the service book of CT teachers is the responsibly of respondent No.2 and same cannot be attributed to appellant; and as such, the appellant cannot be

abused due to the omission on the part of respondent No.2 and beyond the control of appellant.

- vii. That the vested, settled and admitted rights of appellant cannot be sabotaged on the basis of impugned letter and other letters/office orders and correspondence etc.
- viii. That illegal promotion to the junior officials cannot be perpetuated to sabotage the lawful rights promotion of appellant. Hence, the appellant is entitled to promotion to the post of Sr. CT with retrospective effect and further promotions, as awarded to respondents No.3 to 8.
- ix. That the counsel for appellant may be allowed to raise additional grounds at the time of arguments.

It is, therefore, humbly prayed that the present service appeal may please be allowed as prayed for.

Yours Humble Appellant

Zeenat Ara
(Mst. Zeenat Ara)
Through Counsel



Quadratullah Khan Gandapur
Advocate Supreme Court.

Dt. 03 June, 2024

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No. _____ of 2024

Mst. Zeenat Ara
Vs.
Director Elementary & Secondary Education etc
SERVICE APPEAL

CERTIFICATE/VERIFICATION

I, *the appellant*, on this day (*herein mentioned above*) do hereby verify and certify that it is the first Service Appeal on behalf of appellant and no appeal on the subject has earlier been filed.

Zeenat Ara
Appellant

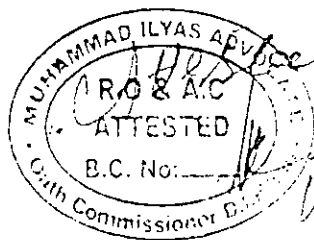
AFFIDAVIT

I, *the Appellant*, do hereby solemnly affirm and declare on oath that all the Para-wise contents of above **Service Appeal** are true & correct to the best of my knowledge and belief and nothing has been deliberately concealed from this Honourable Court.



Identified by counsel:

Zeenat Ara
DEPONENT



ref

Annex = A (8)

MINISTRY OF EDUCATION

FEDERAL BUREAU OF INVESTIGATION

APPOINTMENT ORDER

Consequent upon the recommendation of Departmental Selection Committee, the following trained CT-Female Candidates are hereby appointed as CT teacher on Temporary basis in BPS -9 at Rs. (3820-230-10720) Per Month plus usual allowances as admissible under the rules against vacant CT post in the schools mentioned against each their name from the date of taking over charge.

S.No.	Name with Father's Name	Place of Posting with Tehsil	Remarks
1.	Zeenat Ara D/O Laj Mir Khan	GGMS Mir Akbar Kot Land	Vacant Post
2.	Farah Naz D/O Zarnullah Khan	GGMS Samandar Kot Dandy Darpa Khel	Vacant Post
3.	Sajida Rehman D/O Noor Rehman	GGMS Sharifullah Kot Muhammad Khel	Vacant Post
4.	Nazia Gul D/O Humza Ali Shah	GGMS Arsala Jan Kot Spinwam	Vacant Post
5.	Sadia Naushin D/O Naimatullah Khan	GGMS Laiq Zaman Khatti Killa.	Vacant Post
6.	Shazia D/O Inayatullah Khan	-Do-	Vacant Post
7.	Nadia Begum D/O Gul Nawaz	GGMS Arsala Jan Kot Spinwam	Vacant Post
8.	Zakira D/O Ajab Khan	GGMS Zawab Kot Tabli	Vacant Post
9.	Rafghat D/O Shaifullah	GGMS Badsha Mir Khan Kot Khaddi	Vacant Post
10.	Dilrasat D/O Sher Zamin Khan	GGMS Sharifullah Kot Mohd Khel	Vacant Post
11.	Rifat Begum D/O Mir Dar Ali Khan	GGMS Mir Akbar Kot Land	Vacant Post
12.	Waheeda Begum D/O Fazal Dad	GGMS Mohd Amin Kot Shewa	Vacant Post
13.	Nilam Naz D/O Samiullah	GGMS Amanullah Jan Kot Ahmad Khel	Vacant Post
14.	Anna Gul D/O Sher Bahadar	GGMS Rehmatullah Kot Darpa Khel	Vacant Post
15.	Dil Afroz Begum D/O Mir Qabaz Khan	GGMS Gul Rati Asad Khel	Vacant Post
16.	Naveeda Gul D/O Shakirullah	GGMS Pir Aqal Zaman Kot Mubarak Shahi	Vacant Post
17.	Nagina D/O Taza Din	GGMS Mohd Amin Kot Shewa	Vacant Post

TERMS AND CONDITIONS

1. Their appointments are made on Temporary basis and are liable to termination at any time without any notice. If they wish to resign from their posts, they should give one month prior notice or forfeit one month pay in lieu thereof.
 2. They should bring their Health and Age certificates from Medical Supdt: A.H.Q Hospital Miranshah.
 3. If they fail to assume their charge with-in 15 days, their order will be treated as cancelled.
 4. They should not be handed over charge if they below 18 years and above 40 years of age.
 5. Their academic / professional certificates will be referred to the concerned Boards / Universities by depositing usual fee charge for necessary verification & their salaries will not be drawn until and unless their verification are received in this office.
 6. Their Original Qualifications, Date of Birth, Domicile certificates and C.N.I.C should be checked and Photo Copy be placed on record.
 7. Their services will be terminated if they found absent for 4-days continuously from the date of taking over charge.
 8. They will be terminated if their certificates found fake / bogus and tampered.
- The appointees who are already in-service before 1/7/2001 are entitled for pension and gratuity.

Ends:- No. 73642 Appointment /CT/AEO/ NWA
Copy To:-

1. The Director of Education (FATA) NWFP Peshawar.
2. The Political Agent, Miranshah.
3. The Agency Accounts Officer, Miranshah.
4. AAEO (Female) concerned.
5. Head Mistress GGMS /GGMS Concerned.
6. Candidates concerned.
7. Accountant concerned.

Agency Education Officer,
North Waziristan Agency

Dated 13/12/2010

Qudratullah Khan Gandapur
Advocate Supreme Court of Pakistan
Enrollment No. 5337
Mob: 0314-6927071

Agency Education Officer,
North Waziristan Agency

OFFICE OF THE EDUCATION OFFICER NORTH WAZIRISTAN AGENCY**APPOINTMENT ORDER.**

Consequent upon the recommendation of Department Selection committee, the following trained CT-Female Candidate are hereby appointed / adjusted as CT teacher on Temporary basis in BPS-9 at Rs. (3820-230-10720) Per month plus usual allowance as admissible under the rules against vacant CT post in the schools mentioned against each their name from the date of taking over charge.

SNo.	Name with Father name	Place of posting with Tehsil	Remarks
1	Zeenat Ara D/o Laj Mir Khan	GGMS Mir Akbar Kot Land	Vacant Post
2	Farah Naz D/o Zarnullah Khan	GGMS Samandar Kot Danday Darpa Khel	Vacant Post
3	Sajida Rehman D/o Noor Rehman	GGMS Sharif Ullah Kot Muhammad Khel	Vacant Post
4	Nazia Gul D/o Humza Ali Shah	GGMS Arsala Jan Kot Spin Wam	Vacant Post
5	Sadia Naushin D/o Naimat Ullah Khan	GGMS Like Zaman Khati Killa	Vacant Post
6	Shazia D/o Inayat Ullah Khan	Do	Vacant Post
7	Nadia Begum D/o Gul Nawaz	GGMS Arsala Jan Kot Spin Wam	Vacant Post
8	Zakira D/o Ajab Khan	GGMS Zawab Kot Tabi	Vacant Post
9	Rafghat D/o Shafifullah	GGMS Badhsha Mir Khan Kot Khadi	Vacant Post
10	Dilasat D/o Sher Zamin Khan	GGMS Sharif Ullah Kot Mohd Khel	Vacant Post
11	Rifat Begum D/o Mir Dar Ali Khan	GGMS Mir Akbar Kot Land	Vacant Post
12	Waheeda Begum D/o Fazal Dad	GGMS Mohd Amin Kot Shewa	Vacant Post
13	Nilam Naz D/o Sami Ullah	GGMS Aman Ullah Jan Kot Ahmed Khel	Vacant Post
14	Amna Gul D/o Sher Bahadar	GGMS Rehmat Ullah Kot Darpa Khel	Vacant Post
15	Dil Afroz Begum D/o Mir Qabaz Khan	GGMS Gul Rati Asad Khel	Vacant Post
16	Naveeda Gul D/o Shakir Ullah	GGHS Pir Aqal Zaman Kot Mubarak Shahi	Vacant Post
17	Nagina D/o Taza Din	GGMS Mohd Amin Kot Shiwa	Vacant post

Terms and Conditions:


1. Their appointments are made on temporary basis and are liable to termination at any time without any notice. If they wish to resign from their posts, they should give one month prior notice or forfeit one month pay in lieu thereof.
2. They should bring their health and Age certificate from medical Supdt; AHQ Hospital Miranshah.
3. If they fail to assume their charge with in 15 days, their order will be treated as cancelled.
4. They should not be handed over charge if they below 18 years and above 40 years of age.
5. Their academic / professional certificate will be referred to the concerned boards / universities by depositing usual fee charge for necessary verification and their salaries will not be drawn until and unless their verification are received in this office.
6. Their original qualifications, date of birth, domicile certificate and CNIC should be checked and photo copy be placed on record.
7. Their services will be terminated if they found absent for 4 days continuously from the date of taking over charge.
8. They will be terminated if their certificates found fake / bogus and tampered, the appointees who are already in service before 1/7/2001 are entitled for pension and gratuity.

**Agency Education Officer
North Waziristan Agency**

Endst; No. 736-42/appointment/CT/AEQ/NWA dated 06/13/2010

Copy to:-

1. The Director of Education (FATA) NWFP, Peshawar.
2. The Political Agent, north Waziristan.
3. The Agency
4. AAEO (Female concerned)
5. Candidate concerned.
6. Accountant concerned.


Quadratullah Khan Gandapur
Advocate Supreme Court of Pakistan
Enrollment No. 5332
Mob: 0314-6927070

**Agency Education Officer
North Waziristan Agency**

OFFICE OF THE DISTRICT EDUCATION OFFICER AT MIRANSHAH
Final Seniority List of CT/Sr CT Female in NWTD

Sr.No	Name	Father Name	Place of Posting	Desig:	BPS	D/O Birth	D/O Ist Apptt:	Date of Apptt as CT	Date of Apptt as Reg: CT:	Qual:	Date of prof: Quali:	Remarks
1	Yasmin Dehqan	Rashid Ali	GGMS Jan Bahadar Kot	CT	15	20.09.1962	25.01.1990	25.01.1990	25.01.1990	FA		Not Eligible for promotion to Sr.CT
2	Rukhsana Begum	Allah Bakhsh	IHC Nawab Kot	CT	15	01.04.1970	01.01.1996	01.01.1996	01.01.1996		2/1/2006	Not Eligible for promotion to Sr.CT
3	Zubaida Akhtar	Gul Nawar khan	GGMS Azad Pir Kot Land	Sr CT	16	18.1.1981	10.09.2003	10.9.2003	10.9.2003	MA/M.Ed	05.05.2003	Already promoted to Sr.CT
4	Gul Naz Bibi	Yusaf Khan	GGMS Amanullah Jan Kot	Sr CT	16	20.03.1951	13.10.2003	13.10.2003	13.10.2003	BA	5/5/2003	Already promoted to Sr.CT
5	Amber	Mohammed Subhan	GGMS Sanaullah Kot	Sr CT	16	13.09.1978	21.04.2004	28.04.2004	28.04.2004	BA		Already promoted to Sr.CT
6	Sadia Begum	Anwar M Shah	GGMS Inder Khan Bahra	Sr CT	15	06.12.1976	06.12.2004	06.12.2004	06.12.2004	BA		Already promoted to Sr.CT
7	Sana	Mir Hussain Shah	GGMS Amanullah Jan Kot	Sr CT	16	04.01.1980	04.09.2005	04.09.2005	04.09.2005	BA		Already promoted to Sr.CT
8	Farida Hamid	Abdul Hamid	GGMS Badshah Mir Khan	SrCT	16	04.05.1975	21.02.2007	21.02.2007	No CT Certificate			Already promoted to Sr.CT
9	Amber			CT	15		14.04.2007	14.04.2007	14.04.2007	FA		Not Eligible for promotion to Sr.CT
10				CT	15	14.05.1975	21.02.2007	21.02.2007	14.07.2007	MA/B.Ed/CT	7/14/2007	Already promoted
11				CT	15	24.02.1987	12.12.2007	12.12.2007	12.12.2007	BA/B.ED		Already promoted to Sr.CT
12				CT	15	10/11/1975	7/11/1975	21.02.2007	29.09.2008		9/29/2008	
13				CT	15	11/1/1983	12.04.2007	12.04.2007	29.09.2008		29/9/2008	Already promoted to Sr.CT
14				CT	15							Sr.CT
15				CT	15			21.12.2007	25.11.2009	BA/B.Ed	25.11.2009	Already promoted to Sr.CT
16				CT	15	15.03.1984	15.03.2004	04.03.2010	04.03.2010		04.03.2010	Already promoted to Sr.CT
17				CT	15	20.04.1972	14.09.1988	06.03.2010	06.03.2010	BA.B.Ed	12.2.2010	Already promoted to Sr.CT

Quadratullah Khan Garudapur
Advocate Supreme Court of Pakistan
Enrollment No. 5332
Mob: 0314-6927070

Annex-B

Fin

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12

.....Better Copy.

OFFICE OF THE DISTRICT EDUCATION OFFICER AT MIRANSHAH
FINAL SENIORITY LIST OF CT/SR CT FEMALE IN NWTD

S No.	Name	Father Name	Place of Posting	Desig	BPS	D/o Birth	D/o 1 st Apptt;	Date of Appt as CT	Date of Appt; as Reg; CT	Qual;	Date of Prof; Quali;	Remarks
1	Yasmin Dehqan	Rachid Ali	GGMS Jan Bahadar Kot	CT	15	20/09/1962	25/01/1990	25/01/1990	25/01/1990	FA		Nor eligible for promotion to Sr. CT
2	Rukhsana Begum	Allah Bakhsh	IHC Nawab Kot	CT	15	01/04/1970	01/01/1996	01/01/1996	01/01/1996		02/01/2006	Nor eligible for promotion to Sr. CT
3	Zubaida Akhtar	Gul Nawar Khan	GGMS Azad Pir Kot Land	Sr CT	16	19/01/1981	10/09/2003	10/09/2003	10/09/2003	MA/M.Ed	05/05/2003	Already promoted to Sr. CT
4	Gul Naz Bibi	Yousaf Khan	GGMS Aaman Ullah Jan Kot	Sr CT	16	20/03/1981	13/10/2003	13/10/2003	13/10/2003	B.A	05/05/2003	Already promoted to Sr. CT
5	Nooreen	Muhammad Subhan	GGMS Sharif Ullah Kot	Sr CT	16	10/09/1978	28/04/2004	28/04/2004	28/04/2004	B.A		Already promoted to Sr. CT
6	Sadia Begum	Anwa Ali Shah	GGMS Noor Khan Banda	Sr CT	16	06/12/1976	06/12/2004	06/12/2004	06/12/2004	B.A		Already promoted to Sr. CT
7	Sana	Mir Hussain Shah	GGMS Aman Ullah Jan Kot	Sr CT	16	04/01/1980	04/09/2005	04/09/2005	04/09/2005	B.A		Already promoted to Sr. CT
8	Farida Hamid	Abdul Hamid	GGMS Badhshah Mir Khan	Sr CT	16	04/05/1975	21/02/2007	21/02/2007	NO CT Certificate			Already promoted to Sr. CT
9	Naila Sarwar			CT	15	31/08/1983	14/04/2007	14/04/2007	14/04/2007	FA		Nor eligible for promotion to Sr. CT
10				Sr CT	16	12/06/1983	21/02/2007	21/02/2007	21/02/2007	MA/B.Ed /CT	07/14/2007	Already promoted to Sr. CT
11	Mehnaz Begum	Sharif Ullah		CT	15	04/02/1982	12/02/2007	12/02/2007	12/02/2007	B.A/B.Ed		Already promoted to Sr. CT
12				CT	15	10/08/1976	07/11/1999	07/11/1999	07/11/1999		09/29/2008	
13				Sr CT	16	03/01/1988	12/04/2007	12/04/2007	12/04/2007		29/09/2008	Already promoted to Sr. CT
14				Sr CT	16		21/02/2007	21/02/2007	21/02/2007			Already promoted to Sr. CT
15				Sr CT	16	20/04/1985	21/02/2007	21/02/2007	21/02/2007	B.A /B.Ed	25/11/2009	Already promoted to Sr. CT
16				Sr CT	16	06/07/1979	16/06/2004	04/03/2010	04/03/2010		04/03/2010	Already promoted to Sr. CT
17				Sr CT	16	20/04/1972	14/09/1988	06/03/2010	06/03/2010	B.A /B.Ed	12/02/2010	Already promoted to Sr. CT

Quadratullah Khan
Advocate Supreme Court
Enrollment No. 1000
Mob: 0314-6927070

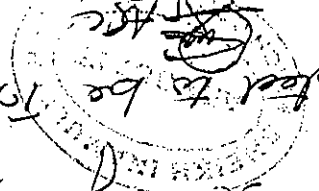
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OFFICE OF THE DISTRICT EDUCATION OFFICER AT MIRANSHAH
FINAL SENIORITY LIST OF CT/SR CT FEMALE IN NWTD

S No.	Name	Father Name	Place of Posting	Desig	BPS	D/o Birth	D/o 1 st Apptt;	Date of Apptt as CT	Date of Apptt; as Reg; CT	Qual;	Date of Prof; Quali;	Remarks
18	Refat Begum	Mir Dar Ali Khan	GGMS Mir Akbar Kot	CT	15	20/01/1999	07/08/2001	29/05/2007	06/03/2010	BA/CT	09/29/2008	Already promoted to Sr. CT
19	Zakira	Ajab Khan	GGHS Miran Shah	CT	15	05/04/1979	31/07/1999	06/03/2010	06/03/2010			Service Book required
20	Zeenat ARa	Lajmir	GGMS Gul Rauf Kot	CT	16	03/02/1980	06/03/2010	06/03/2010	06/03/2010			Service Book Required
21	Nagina	Taza Din	GMS Mohammad Ain Kot	CT	16	03/02/1982	29/05/2007	06/03/2010	06/03/2010	CT	03/06/2010	Already promoted to Sr. CT
22	Shazia	Inayatullah	GGHS Pir Aqal Zaman Kot	Sr CT	16	01/05/1983	07/01/2004	06/03/2010	06/03/2010	B.A/B.Ed	14/07/2007	Already promoted to Sr. CT
23	Farah Naz	Zarnullah Khan	GGMS Sharif Ullah Kot	Sr CT	16	15/04/1985	12/04/2005	06/03/2010	06/03/2010	CT/M.Ed	06/03/2010	Already promoted to Sr. CT
24	Gul Naz Bashir	Bashir Ahmed	GGMS Samandar Kot	Sr CT	16	04/02/1986	29/03/2010	29/03/2010	29/03/2010	B.A/CT	09/02/2008	Already promoted to Sr. CT
25	Nabila Akbar	Akbar Khan	GGMS Dost Muhammad Kot	Sr CT	16	03/03/1987	14/04/2007	29/03/2010	29/03/2010	CT/B.Ed	01/10/2009	Already promoted to Sr. CT
26	Rohina	Ajab Khan	GGHS Zawab Kot	CT	15	20/01/1988	29/03/2010	29/03/2010	29/03/2010	MA/B.Ed	09/02/2008	
27	Neelam	Samiullah	GGMS Iran Kot	CT	15	10/04/1980	02/04/2000	03/07/2010	03/07/2010		03/07/2010	
28	Dil Afroz	Mir Qabaz	GGMS Gul Rati Kot	CT	15	01/01/1982	09/10/2003	03/07/2010	03/07/2010			


Qudratullah Khan Gandapur
Advocate Supreme Court of Pakistan
Enrollment No. 5332
Mob: 0314-6927070



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3-2-2010 Education Quality Authority = 11/11/2010

1-2-2010 Education Quality Authority = 11/11/2010

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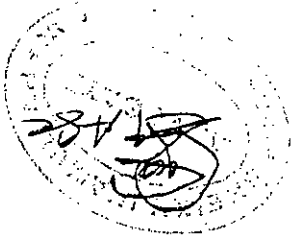
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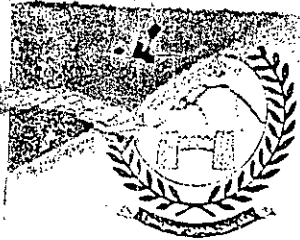
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21/08/2023 97

Back Benefits
BPS-15 (strict) promotion
BPS-16 (strict) promotion
Back date of service

DEO (F) & ...
Back date of service
Back date of service

Back Benefits | BPS-15 (strict) promotion
Back Benefits | BPS-16 (strict) promotion
Back date of service



Letter No 11
16-01

Annex - 3D (18)
Directorate of Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar
Merged Areas Phone# 091/-9330242
(Pension/RB&DC/B-Fund)

016

Dated 16/10/2024

To

The District Education Officer (Female)
North Waziristan


Subject:- APPLICATION FOR ONE STEP PROMOTION/REGULAR PROMOTION
ON SENIORITY BASIS


I am directed to refer this office letter No, 10890/E-6/F/Complaint/NWD dated 06.07.021/ 14221 dated 18.10.2021 on the subject noted above and to ask you that the Departmental Appeal according to the subject matter in respect of Mst; Zenat Ara CT-BPS-15 Gul Rauf Kot Sherani Mada Khel NWTD, has been rejected. However she may be informed accordingly, please..

Assistant Director (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No. 1017-181
Copy forwarded to the:-

1. Section Officer (S/F) E&SED KPK Peshawar w/r to his No, SO(S/F)2-6/DPC Meeting/ZeenatAra /2021 dated 13.09.2021.
2. P.A to Additional Director (Establishment) local Directorate


Qudratullah Khan Gandapur
Advocate Supreme Court of Pakistan
Enrollment No. 5332
Mob: 0314-6927076


26/12/2024
Assistant Director (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

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DIRECTOR OF ELEMENTARY & SECONDARY EDUCATION KHYBER
PAKHTUNKHWA, PESHAWAR.
MERGED AREAS PHONE NO. 091-9330242
(PENSION / RB&DC/B-FUND)

NO. 1016

dated 10/10/2024

To,

The District Education Officer (Female)
North Waziristan.

SUBJECT:- APPLICATION FOR ONE STEP PROMOTION / REGULAR
PROMOTION ON SENIORITY BASIS.

I am directed to refer this office letter No. 10890/E-6/F/Complaint/NWD dated 06/07/2021/ 14221 dated 18/10/2021 on the subject noted above and to ask you that the Departmental Appeal according to the subject matter in respect of Mst; Zenat Ara CT BPS-15 Gul Rauf Kot Sherani Mada Khel NWTD, has been rejected. However she may be informed accordingly, please.

Assistant Director (Estab)
Elementary & Secondary Education
KP Peshawar.

Endst; No. 1017-18

Copy forwarded to the:-

1. Section Officer (S/F) E&SED KPK Peshawar W/r to this No, SO(S/F)2-6/DPC meeting/Zeenat Ara /2021 dated 13/09/2021.
2. P.A to Additional Director (Establishment) local Directorate.


Qudratullah Khan Gandapur
Advocate Supreme Court of Pakistan
Enrollment No. 5332
Mob: 0314-6927070

26/2/2024
Assistant Director (Estab)
Elementary & Secondary Education
KP Peshawar.

