

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

REPLY TO THE OBJECTION PETITION IN EXECUTION PETITION NO 320/2024 IN
SERVICES APPEAL #831/2022

Mr. Waheed Ullah S/O Mir Jehandad Khan
Chawkidar, GHSS Mamash Khel Bannu

..... Appellant.

VS

Government of Khyber Pakhtunkhwa through Secretary
(E&SE) Department and others

..... Respondents.

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Dated: _____ / _____ /2024



LITIGATION OFFICER
DEO (Male) BANNU

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(E&SE) Department and others

..... Respondents.

REPLY TO THE OBJECTION PETITION

Respectfully Sheweth: -

PRELIMINARY OBJECTIONS:

1. That this office has never delayed the implementation of the decision of this Honorable Services Tribunal.
2. That the seniority list is already been prepared according to the rules and policy of all Class-IV employees as per the direction of this Honorable Services Tribunal and the petitioner has been placed at his own place.
3. That the department has called DSC meeting and after fulfilling the codal formalities he cannot be considered for promotions as he is at S.No. 48, therefore, the execution petition may kindly be dismissed in the favor of department.
4. That the present Objection Petition to the Compliance report is just to pressurize the respondents unduly as the respondents has already submitted a detailed compliance report in this Honorable Tribunal.

ON FACTS:

1. That the respondent has initiated the process for putting the petitioner in its original position as per the decision of this Honorable Services tribunal as working paper was prepared and final seniority list of all Class-IV employees was finalized therein according to 2013 rules and the petitioner did not fall in the ambit of promotion zone, they will be promoted as per their own turn. And in the current scenario they cannot be considered for promotions as he is at S.No. 48 and it will open a new Pandora box for the other Class-IV employees who are senior than the petitioner in the seniority list (Annexure A & B).

**Khyber Pakhtunkhwa
Service Tribunal**

D/O No. 15976

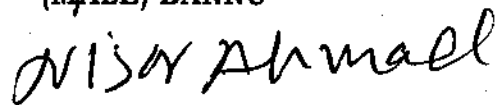
Date 23-09-24

2. That Para No 2 is incorrect and denied up to the non-consideration of the present petitioner for promotion, wherein the present petitioner along with others was considered for promotion under departmental policy Notification 2013 while the policy notification of the year 2019 is for establishment department and has nothing to do with this department as it has its own policy. For rest of the para and consideration of the one Rasool Khan Daftari and others, this department has followed the law, rules and policy and amendment in the year 2014 which is clear about the promotion of Daftari and a typing speed as well as the cushion period of 6 months for promotion and if not improved shall be reverted as the case may be. (Annexure C & D)
3. That Para No 3 is incorrect and denied, as this office has always to follow law, rules and policy and has implemented the order of this Honorable Services Tribunal in its letter and spirit and compliance report has submitted accordingly in this Honorable Services Tribunal but despite of that this Objection Petition, the petitioners are trying to present their case with twisted facts and figures which if accepted will be a wrong precedents for others and will work as a flood gate for all such like cases and will become an unending chain of litigation. In such like situation there is a legal maxim where two wrongs cannot make one right, (Annexure E)

PRAYER:

In view of the above made submissions it is requested that this Hon'ble Service Tribunal may very graciously be please to dismiss the instant execution petition with heavy cost.


DISTRICT EDUCATION OFFICER
(MALE) BANNU



Resp - No - 1



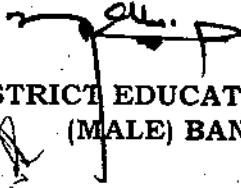
**OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) BANNU**

Outside Miryan Gate, Near GHS No 4 Bannu



AUTHORITY

Certified that Mr. Azmat Ullah Khan SS/ Litigation Officer of this Office is hereby authorized to submit this Para wise reply on behalf of under signed in connection with execution petition titled as Mr. Waheed Ullah vs Govt; in Reply to Objection Petition in Execution Petition No 320/2024 in Services Appeal No. 831/2022.


DISTRICT EDUCATION OFFICER
(MALE) BANNU

M. Nisay Ahmad

ResP—(1)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
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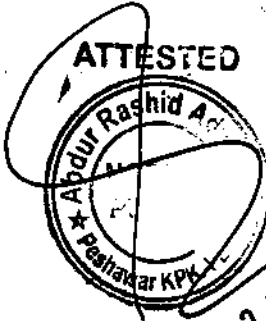
AFFIDAVIT

I Mr. Nisar Ahmad DEO (M) Bannu do here by Certify that all the contents of these Para wise reply are true & correct to the best of my knowledge and nothing has been concealed from this Honorable Service Tribunal.

It is further stated on oath that in this appeal the answering respondents have neither been place on-part nor their defense struck off / cost.

[Signature]
DISTRICT EDUCATION OFFICER
(MALE) BANNU

Nisar Ahmad.



R-U
23 SEP 2024



OFFICE OF THE DISTRICT EDUCATION OFFICER ERSE (MALE) BANNU

PH No. 0928-660005, 660346, Fax 928-660005, E-mail: emlabannu@vqabce.com

Minutes of the Meeting of Departmental Promotion Committee

A Meeting of Departmental Promotion Committee was held on dated; 28-06-2024 at 11.30 AM at DEO (M) Office Bannu under the Chairmanship of DEO(M) Bannu, to discuss the promotion cases of Class-IV Govt: servant to the post of Junior Clerks on seniority cum fitness as per Govt: policy, and in the light of Scrutiny Committee / DRC.

The following Officers/Officials attended the meeting: -

01	Nisar Ahmad Appointing Authority	Chairman
02	Mehmood Khan Superintendent: Local Office	Member
03	ADEO Primary: Local Office	Member
04	Dealing Assistant	Member

The meeting started with the recitation from the Holy Quran. The Chairman welcomed the participants of the meeting and directed the Dealing Assistant to discuss the agenda points with the participants of the meeting. The Dealing Assistant explained that in the year 2022-23, 39 post of J/Clerks were vacant and during the process of promotion from Class-IV to J/Clerks, 13 Class-IV have been promoted out of 33 % quota vide order No. 15708-24 dated; 4-12-2023, whereas 23 J/Clerks have been appointed out of 100 % deceased/Medical Board sons quota vide order No. 15979-16001 dated; 9-12-2023.

He further explained that in the light of Honorable Service Tribunal decision a Scrutiny committee was constituted Vide Notification No. 3833-36 Dated: 23-05-2024 to check the relevant record of the 03 petitioner for the purpose of promotion from Class-IV to /Clerk on the basis of seniority cum fitness. He further presented that the seniority committee checked all relevant documents i.e Seniority list, S/Books, Qualifications and their written knowledge as per detail given below.

Selection criteria: -

- 1- Promotion shall be made on the basis of seniority cum fitness subject to provision of minimum qualifications SSC and 25 words per minute typing test /computer knowledge as required for the subject post.
- 2- 33% by promotion of the available vacancies from Class-IV seniority list on the basis of seniority cum fitness.
- 3- The J/Clerk appointed by promotion shall achieve a speed of 25 words per minutes in English typing within six months of their promotion, otherwise they shall be reverted.

CLASS-IV EMPLOYEES WHO ARE TO BE CONSIDERED FOR PROMOTION TO THE POST OF J/C (BPS-11) AS PER 2013 PROMOTION POLICY in light of service tribunal decision


S.N	Name and Designation	D/O 1 st Appoint:	D/O passing SSC	Seniority No.	Remarks
1-	Afsar Ali Shah S/O Qamar All Shah Lab Attendant BPS-03 GHS No. 1 Bannu	01-12-1993	28-07-1996	25	13 Class-IV already promoted and he is at S.No.25, if he is promoted out of turn 11 Class-IV will be affected.
2-	Falak Naz S/O Qadar Khan Lab Attendant BPS-03 GHS No. 3 Bannu	01-10-1996	27-01-2001	41	13 Class-IV already promoted and he is at S.No.41, if he is promoted out of turn 27 Class-IV will be affected.
3-	Waheed Ullah Khan S/O Mir Jehandad Khan Chawkidar BPS-03 GHSS Mamash Khel Bannu	15-06-2005	11-08-2000	48	13 Class-IV already promoted and he is at S.No.48, if he is promoted out of turn 34 Class-IV will be affected.
4-	Muhammad Ibrahim S/O Bilawar Khan Sweeper BPS-03 GHS Kotka Belawar Khan Bannu	09-05-1996	26-06-2006	54	13 Class-IV already promoted and he is at S.No.54, if he is promoted out of turn, 40 Class-IV will be affected.


Note:


After detail discussion the DPC committee members, Scrutinized all the relevant record pertaining to the petitioner promotion case in detail, but it was observed that all the mentioned Class-IV employees are not follow the merit criteria on the basis of seniority cum fitness as they are at S.No. 25,

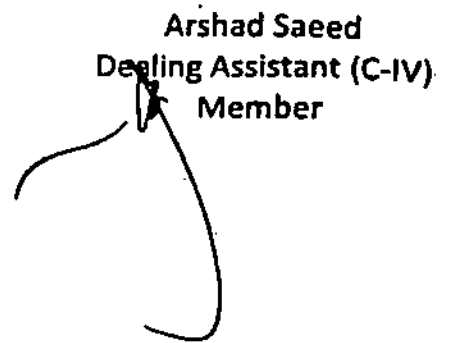
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41, 48 and 54 and they are out of promotion range, if they are promoted out of turn at this stage a Gate way for other effected class-IV will be opened and also the same will create a Pandora box for the department, which will be out of control as there are more than 250 C-IV employees working in the district against Class-IV posts. The committee unanimously decided that the petitioner not follow the merit criteria on the basis of seniority cum fitness, but if the Honorable court desired that the petitioner should be promoted in all means, the Department will follow the Court direction in letter & spirit on the next short date. With this observation the meeting ended with the vote of thanks.


Nisar Ahmad
DEO (M) Bannu
Chairman


Mehmood Khan
Superintendent
Member


Wajid Ullah Khan
ADEO (Primary)
Member


Arshad Saeed
Dealing Assistant (C-IV)
Member



OFFICE OF THE DISTRICT EDUCATION OFFICER MALE BANNU
 Final Seniority list of (Class IV, GHSS, GHS, GMS, SDEOs offices(GPS), DEO office) Bannu Corrected up to 30-06-2022.

Name	Father/Husband Name	CNIC	Designation	Domicile	Date of Birth	Date of 1st app:	Date of Passing SSC/Minor Declaration	Office/School
1	RASUL KHAN	11101-2041729-3	DAFTAR (BPS-4)	Bannu	02-09-84	12-01-13	15-08-10	DEO (M) BANNU
2	ASMAT ULLAH KHAN	11101-1497713-3	CHOWKIDAR (BPS-3)	Bannu	07-03-84	27-09-87	31-07-81	GPS AMIN MUGHAL KHEL
3	AMIN ULLAH KHAN	11101-1501245-3	CHOWKIDAR (BPS-3)	Bannu	04-03-66	11-10-87	10-08-83	GPS KHAN SUBA MITHA KHEL
4	ANWAR ULLAH KHAN	11101-1441135-9	CHOWKIDAR (BPS-3)	Bannu	28-09-65	12-10-87	11-08-82	GPS AZIM KILLA
5	MASHAL KHAN	11101-845534-3	CHOWKIDAR (BPS-3)	Bannu	15-02-64	13-10-87	30-07-80	GPS MALAY KHAN KILLA
6	SANA ULLAH	11101-1473277-3	CHOWKIDAR (BPS-3)	Bannu	15-10-67	18-07-85	04-09-88	GHSS SHABAZ AZMAT KHEL
7	NASIR ALI KHAN	11101-1473277-3	CHOWKIDAR (BPS-3)	Bannu	18-08-68	16-12-87	10-08-89	GPS HAYAT KAKKI
8	ABDUL SAMAD KHAN	11101-5928956-1	CHOWKIDAR (BPS-3)	Bannu	03-01-74	25-04-90	1990	GPS SABU KHEL ABOL QAYUM
9	UMER AYAZ	11101-6948051-9	CHOWKIDAR (BPS-3)	Bannu	11-03-69	25-04-91	15-08-89	GHS NO.3 BANNU
10	WALI KHAN	11101-2932786-9	CHOWKIDAR (BPS-3)	Bannu	12-05-72	03-08-91	25-08-88	GPS ISMAILI MAMA KHEL
11	RAHIM BADSHAH	11101-1489948-9	LAB ATTENDANT (EPS-3)	Bannu	13-02-72	28-09-91	15-03-88	GHS BAZAR AHMAD KHAN
12	GHAFAR ALI KHAN	11101-1494622-5	LAB ATTENDANT (EPS-3)	Bannu	01-01-71	16-02-92	1987	GHSS MAMA KHEL BANUCHI
13	MUHAMMAD ISHAQ	11101-6435131-7	CHOWKIDAR (EPS-3)	Bannu	20-08-72	29-04-92	27-06-89	GPS PARAZ KHONI KHEL
14	SHOAB UR RAHMAN	11101-8590507-1	CHOWKIDAR (EPS-3)	Bannu	10-03-71	19-05-92	01-04-88	GHS GHAJAN ISMAIL KHANI
15	ASGHAR ALI KHAN	11101-1482323-7	CHOWKIDAR (EPS-3)	Bannu	18-02-66	30-05-92	10-08-83	GHS NAR JAFFAR KHAN
16	KHUBAZ KHAN	11101-1451977-1	CHOWKIDAR (EPS-3)	Bannu	14-04-73	29-12-92	31-08-89	GHS HIBAK SHERZA KHAN
17	MEHER GUL	11101-1497982-9	CHOWKIDAR (EPS-3)	Bannu	01-07-63	01-01-94	04-07-93	GPS ZER NAWAZ BAKA KHEL
18	MALIK ABDUL QAYUM KHAN	11101-4197051-7	CHOWKIDAR (EPS-3)	Bannu	14-04-68	01-01-94	31-07-85	GPS KHUJRAM KHEL IMTIAZ
19	DOST MUHAMMAD KHAN	11101-1487311-9	CHOWKIDAR (EPS-3)	Bannu	01-09-74	01-02-95	09-08-94	GPS ABDULLAH JAN KILLA
20	M. NISAR KHAN	11101-1904330-9	CHOWKIDAR (EPS-3)	Bannu	08-04-74	05-04-95	27-07-92	GPS HUKUM ZAD KAKKI
21	SAHIB ZAMAN	11101-1425508-1	CHOWKIDAR (EPS-3)	Bannu	15-11-72	10-10-89	30-07-95	GCMHS NO.4 BANNU
22	MIR SALEH SHAH	11101-9057331-1	LAB ATTENDANT (EPS-3)	Bannu	05-08-65	15-01-96	07-08-80	GPS PIR KHEL KAKKI NO.2
23	JALANDHAR KHAN	11101-1074585-7	CHOWKIDAR (EPS-3)	Bannu	19-04-68	11-04-96	19-08-84	GPS TAZIRI BIZAN KHEL
24	OIL FARAZ KHAN	11101-5496375-7	CHOWKIDAR (EPS-3)	Bannu	10-05-72	11-05-96	15-08-89	GHS BAZAR AHMAD KHAN
25	AFSAR ALI SHAH	11101-1520422-7	CHOWKIDAR (EPS-3)	Bannu	01-12-71	01-12-93	28-07-96	GHS NO.1 BANNU
26	FARMAN ALI SHAH	11101-1448101-9	LAB ATTENDANT (EPS-3)	Bannu	19-06-71	04-11-97	25-08-88	GPS ZABARDAST MANDEV
27	ANWAR ALI KHAN	11101-5691723-3	CHOWKIDAR (EPS-3)	Bannu	22-11-74	17-06-90	1997	GPS SAIDAN ABDUL QADIR SHAH
28	BALQIAZ KHAN	11101-5899816-1	CHOWKIDAR (EPS-3)	Bannu	09-02-63	02-05-98	28-01-89	GPS KAFSHI KHEL ASGHAR ALI
29	IRFANULLAH KHAN	11101-1422859-7	CHOWKIDAR (EPS-3)	Bannu	07-07-63	10-08-98	1980	GPS PAULA BALQIAZ
30	ANWAR SOHAIL	11101-6218428-9	CHOWKIDAR (EPS-3)	Bannu	04-09-71	01-09-98	21-08-87	GPS JAHANGIR KAKKI
31	FARMAN ULLAH KHAN	11101-1475799-7	CHOWKIDAR (EPS-3)	Bannu	01-04-60	02-11-98	13-05-97	GPS SARWAR GHAZNI KHEL
32	MAIN ULLAH KHAN	11101-1523247-3	CHOWKIDAR (EPS-3)	Bannu	23-03-77	19-07-99	06-07-92	GPS MAZANGHA LANDIDAK
33		11101-4257205-9	CHOWKIDAR (EPS-3)	Bannu	01-02-73	20-01-00	01-08-93	GPS AZAD KHAN KAKKI
33		11101-6999406-5	CHOWKIDAR (EPS-3)	Bannu				

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34	ENJANG KHAN	MOHAMMED JAMIL KHA	11101-0390803-7	CHOWKAR (EPS-3)	BAJRU	27-02-74	15-03-00	31-07-02	GPS NO 2 WAZIR
35	RAZ ALI KHAN	GHULAM SADIQUE KHAN	11101-5918938-3	CHOWKAR (EPS-3)	BAJRU	01-01-77	14-03-00	31-07-02	GPS NO 2 WAZIR
36	SER DAZ KHAN	ATTA ULLAH KHAN	22201-0389687-1	CHOWKAR (EPS-3)	BAJRU	19-10-82	01-04-00	01-03-00	GPS CHAKRA WAZIR
37	RIFAT ULLAH KHAN	AMIR QAD KHAN	11101-0942625-9	LAB CASE (EPS-3)	BAJRU	03-04-81	12-12-00	19-02-02	GPS TALUK BAJRU
38	GUL FAZAL JAN	SANAM GUL	11101-9969529-3	CHOWKAR (EPS-3)	BAJRU	30-12-72	01-11-00	1983	GPS SAO TANGOT CHAKRA
39	MAHBOOB RAHMAN SHAH	NOOR AHMAD SHAH	11101-1532583-3	CHOWKAR (EPS-3)	BAJRU	01-01-73	01-12-00	14-02-00	GPS SAO TANGOT CHAKRA
40	ASID RAHMAN	AJIN ULLAH JAN	11101-7050249-5	CHOWKAR (EPS-3)	BAJRU	10-01-81	27-03-01	22-09-02	GPS SAO TANGOT CHAKRA
41	IFALAK NAZ	QADAR KHAN	11101-4918566-1	LAB ATTENDANT (EPS-3)	BAJRU	10-02-78	01-10-00	27-01-01	GPS NO 2 BAJRU
42	IHSAN ULLAH KHAN	GUL ZAMAN	11101-3793144-9	CHOWKAR (EPS-3)	BAJRU	15-04-84	01-04-01	07-11-02	GPS CHAKRA NO 2
43	ASDUR RAHMAN	MIR ALAM	11101-7347139-1	SWEEPER (EPS-3)	BAJRU	02-01-73	27-03-04	1980	GPS MIR ALAM CHAKRA
44	ADNAN KHAN	AKBAR NAWAZ	22201-5412165-5	CHOWKAR (EPS-3)	BAJRU	10-07-83	29-03-04	15-11-03	GPS MIRA KHEL VOLGA
45	IRFAN ULLAH KHAN	MUHAMMAD ISHAQ KHAN	11101-6689306-7	CHOWKAR (EPS-3)	BAJRU	17-04-75	09-03-05	21-09-04	GPS TITER KHEL BAJRU KHEL
46	MUHAMMAD ADIL ZAMAN	ABDUL GHAFAR	11101-1494911-9	CHOWKAR (EPS-3)	BAJRU	03-06-78	08-04-05	18-05-05	GPS AZDUL GHAFAR MIRA KHEL
47	GUL NAZIF KHAN	SAHIB KHAN	11101-1494110-3	CHOWKAR (EPS-3)	BAJRU	15-01-79	21-05-05	1988	GPS KAMAT GAZI LANDAK
48	WAHEED ULLAH KHAN	MIR JAHANDAD KHAN	11101-7941352-5	CHOWKAR (EPS-3)	BAJRU	07-11-84	15-06-05	11-08-00	GHSS MAMASH KHEL
49	KHALID REHMAN	MAQBOOL REHMAN	11101-8747891-5	CHOWKAR (EPS-3)	BAJRU	01-04-84	12-09-05	19-8-04	GPS KAKO LANDAK
50	SHAHOOD ALI SHAH	PIR SABIR SHAH	11101-5811385-7	CHOWKAR (EPS-3)	BAJRU	04-01-84	01-01-06	01-10-03	GPS PIR SABIR SHAH BANGUR
51	NISAR KHAN	ZAR GUL KHAN	11101-1062859-3	CHOWKAR (EPS-3)	BAJRU	05-01-71	03-02-08	17-12-80	GPS TOPKA MUHAMMAD ALI KHAN
52	FATI ULLAH	GUL ZAMAN	11101-0810200-3	SWEEPER (EPS-3)	BANNU	10-08-85	23-02-06	08-02-02	GPS GUL ZAMAN GHORHOLA
53	ZIA ULLAH	ABID ULLAH	11101-3382541-3	CHOWKAR (EPS-3)	BANNU	08-04-88	09-03-06	20-08-05	GPS GULAN KILLA
54	MUHAMMAD IBRAHIM	BILAWAR KHAN		SWEEPER (EPS-3)	BANNU	12-01-78	09-05-06	26-06-06	GPS KOTKA BUKHAR KHAN
55	ZAFEER ULLAH	SHUJA AMIR KHAN	11101-4183043-7	CHOWKAR (EPS-3)	BANNU	08-04-84	29-08-06	09-07-00	GPS MEJUM KAKO
56	ABDUL RAUF KHAN	SHEROZ KHAN	11101-9815468-5	LAB CASE (EPS-3)	BANNU	02-05-70	01-09-06	31-08-87	GHSS MURAR
57	IRFANULAH	SHARIF ULLAH KHAN	22201-8248913-3	LAB CASE (EPS-3)	BAJRU	01-01-84	01-09-06	2001	GPS GUL JAYAR DOMEL
58	WAHID ULLAH SHAH	AKBAR ZAMAN SHAH	11101-5924215-7	CHOWKAR (EPS-3)	BANNU	05-02-82	01-09-06	15-06-02	GPS GUL SHAHWARAZ KAKO
59	FARHAD KHAN	GHULAM RASOOL KHAN	11101-9476395-5	CHOWKAR (EPS-3)	BANNU	13-04-84	03-10-06	21-11-00	GPS KAKO
60	UMER GUL	LATIF KHAN	22201-8289235-1	LAB ATTENDANT (EPS-3)	FR BANNU /WAZIR	15-01-88	01-07-05	15-11-08	GHSS PADDA KHEL
61	MURAD ALI KHAN	TOR ALI KHAN	11101-5069197-1	CHOWKAR (EPS-3)	BANNU	06-06-71	21-12-06	10-05-05	GPS LEWAN DARGARZ
62	DIL NAWAZ KHAN	MUHAMMAD NAWAZ KHAN	11101-1490255-1	LAB ATTENDANT (EPS-3)	BANNU	01-01-82	12-01-81	2006	GPS SYED TUGHAL KHEL
63	JAVED KHAN	NAEEM KHAN	11101-3927121-9	LAB ATTENDANT (EPS-3)	BANNU	03-08-74	15-03-07	06-07-92	GPS KHAN ZAMAN MURAR
64	MUHAMMAD KHALID KHAN	SHAISTA KHAN	11101-8303654-9	CHOWKAR (EPS-3)	BANNU	01-05-77	29-05-07	1997	GPS TOWNSHIP BANNU

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67	ZAFRAN KHAN	SHAFI RAHMAN	11101-6569629-9	CHOWKIDAR (BPS-3)	BANNU	14-04-90	08-07-07	26-08-08	GPS BAZIDA YOUSAF SHAFI UR RAHMAN
68	MUHAMMAD NISAR KHAN	SHER ALI KHAN	11101-6619815-5	CHOWKIDAR (BPS-3)	BANNU	18-12-71	03-09-07	20-07-91	GPS MUMBATI BARAKZAI
69	RAFIQ HAMEED ULLAH KHAN	ALI ABBAS KHAN	11101-1460026-1	CHOWKIDAR (BPS-3)	BANNU	05-05-78	01-10-07	17-06-05	GPS BAYAZ KHAN DARGARIZ
70	ARSHAD	RASHID ULLAH	22201-8661981-3	CHOWKIDAR (BPS-3)	BANNU	07-04-88	08-01-08	20-08-05	GPS KARAB KILLA
71	LATIF ULLAH SHAH	AMIR TAZ ALI SHAH	11101-0605928-9	NAIB DASID (BPS-3)	BANNU	01-09-83	01-02-08	1999	GMS ADHAMI SULTAN SHAH
72	MUHSIN ULLAH KHAN	REHAM DAD KHAN	11101-8945985-1	CHOWKIDAR (BPS-3)	BANNU	20-04-88	03-03-08	19-06-04	GPS AMIR DAD KHWAJAMAD LANDIDAK
73	ZAHID ULLAH KHAN	NAZAR KHAN	11101-3013178-1	CHOWKIDAR (BPS-3)	BANNU	15-02-81	02-05-08	15-09-01	GPS KOTKA AZAD KHAN
74	HIDAYAT ULLAH	MIR WALI KHAN	11101-5566650-9	CHOWKIDAR (BPS-3)	BANNU	14-01-71	02-06-08	18-02-81	GPS MUHAMMAD KHAN GAMBER
75	KASHIF KHAN	MIR GHAFAR KHAN	11101-7596662-5	CHOWKIDAR (BPS-3)	BANNU	13-04-92	15-05-07	15-07-08	GPS FAZAL HAQ MALWANA
76	IBRAR KHAN	NAEEM KHAN	11101-7716418-3	SWEEPER (BPS-3)	BANNU	01-02-88	01-01-09	20-06-05	GHS KHAN ZAMAN NURAR
77	ZIA ULLAH KHAN	MUHAMMAD ILYAS KHAN	11101-1521902-3	CHOWKIDAR (BPS-3)	BANNU	03-03-80	29-03-04	15-07-09	GPS SHAH BUREY BHARAT
78	ATTA ULLAH KHAN	BADSHAH KHAN	11101-1491623-9	NAIB DASID (BPS-3)	BANNU	14-02-79	11-11-09	30-07-85	GHS NURAR
79	ZAHID ULLAH KHAN	GUL RAZIAZ	11101-6267788-5	NAIB DASID (BPS-3)	BANNU	27-04-89	07-12-09	20-06-05	GMS SAKHI SARWAR MANDEW
80	MUHAMMAD ISRAHIM SHAH	MUHAMMAD ZAHIR SHAH	11101-8702634-5	FARASH (BPS-3)	BANNU	02-05-83	23-06-10	08-07-07	GPS ZAHIR SHAH AKHUNDAN
81	NASIR KHAN	ZULFIQAR ALI KHAN	11101-5240290-1	NAIB DASID (BPS-3)	BANNU	01-02-91	05-07-10	04-01-08	GMS SABO KHEL MANDAN
82	ILYAS KHAN	ALI BAT KHAN	11101-1489441-1	CHOWKIDAR (BPS-3)	BANNU	15-10-78	30-07-10	01-03-86	GPS EMAR KHEL KAKKI
83	FEROZ KHAN	LAIQ ZAMAN	11101-9083160-7	NAIB DASID (BPS-3)	BANNU	01-01-91	29-08-09	30-11-10	GPS GHORA WAZIRAN NOOR NAWAZ
84	JAVED ZAMAN	OIL ZAMAN	11101-4808264-1	CHOWKIDAR (BPS-3)	BANNU	23-09-87	05-11-09	15-06-11	GPS AMIR KHAN BHARAT
85	MUHAMMAD USMAN KHAN	MUHAMMAD LUQMAN KHAN	11101-5263262-3	NAIB DASID (BPS-3)	BANNU	10-03-92	01-05-10	15-06-11	GHS NO.2 BANNU
86	ASIF KHAN	HAZRAT KHAN	11101-9105496-1	BEARER (BPS-3)	BANNU	14-03-87	23-12-10	26-08-08	GHS NO.2 BANNU
87	SHAMID ULLAH KHAN	ABDUL WAHAB	11101-9230790-3	NAIB DASID (BPS-3)	BANNU	08-02-88	01-01-11	14-06-09	SDEO MALE BANNU
88	ZOHIB ALI SHAH	MUHAMMAD DAR ALI SHAH	11101-3652461-1	CHOWKIDAR (BPS-3)	BANNU	01-01-91	08-01-11	14-06-09	GPS PIR ABDULLAH SHAH PIRAN TUGHAL KHEL
89	NAIKATULLAH SHAH	MIR ATLAS SHAH	11101-1797791-9	CHOWKIDAR (BPS-3)	BANNU	13-03-91	02-02-11	03-01-00	GPS SHAMA KHEL KOTI SADAT
90	MUHAMMAD MASOOD	GHULAM MAQSOOD	11101-1450119-5	LAB ATTENDANT (BPS-3)	BANNU	15-03-74	07-02-11	1988	GHS SHABAZ AZMAT KHEL
91	HABIB NAWAZ KHAN	UMAR NAWAZ KHAN	11101-4212433-1	CHOWKIDAR (BPS-3)	BANNU	25-08-89	01-03-11	20-06-06	GCHSS BANNU
92	SHADMAN NAWAZ	UMER NAWAZ	11101-2568931-9	LAB ATTENDANT (BPS-3)	BANNU	02-03-93	01-06-11	14-06-09	GCHSS BANNU
93	RAHIM ULLAH	ZERAJ	11101-6626631-1	CHOWKIDAR (BPS-3)	BANNU	03-02-90	11-09-11	15-06-97	GPS KOTKA BILAWAR KHAN
94	ARQAN KHAN	SHER KAT ALI KHAN	11101-0935908-1	NAIB DASID (BPS-3)	BANNU	02-04-90	12-10-11	13-11-06	GMS NO.1 BANNU CITY
95	NAZAR RAHMAN	ABD UR RAHMAN SHAH	11101-4166111-9	CHOWKIDAR (BPS-3)	BANNU	02-01-76	10-01-12	06-07-92	GPS SADAT MADAK SHAH
96	WASIM DARAZ	KHAN DARAZ KHAN	11101-6900315-1	CHOWKIDAR (BPS-3)	BANNU	01-01-92	12-01-12	15-06-10	GPS BANNU CITY NO.9
97	HIDAYAT ULLAH KHAN	MUHAMMAD KHAN ZAMAN	11101-1500693-1	LAB ATTENDANT (BPS-3)	BANNU	01-07-69	11-06-11	12-06-12	GHS KACHKOT ASAD KHAN
98	NAJEEB ULLAH KHAN	IQBAL KHAN	11101-6056181-7	CHOWKIDAR (BPS-3)	BANNU	15-09-87	12-07-12	16-07-05	GPS HAJBAT KHAN MANDAN

OFFICE FILE



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110	MATI ULLAH KHAN	11101-1499895-9	CHOWKIDAR (BPS-3)	BANNU	06-01-82	13-07-12	2000	GPS KOTKA MDR SHAH JAHAN MAMA KHEL
111	UMER DARAZ KHAN	11101-1523356-3	CHOWKIDAR (BPS-3)	BANNU	07-06-77	13-07-12	1994	GPS FAIZ TALAB ABAS MANDAN NO.1
112	SHAFTULLAH KHAN	11101-1483827-1	CHOWKIDAR (BPS-3)		05-02-92	13-07-12	21-07-08	GHS GUL ZAMAN GHORHALA
113	GUL ZAMAN	11101-9203814-3	LAB ATTENDANT (BPS-3)		01-01-72	13-07-12	21-03-84	GHS GUL ZAMAN GHORHALA
114	SHER AJAM	11101-9819933-1	NAIB QASID (BPS-3)	BANNU	15-09-85	14-07-12	16-07-07	GHS AL-HAMID WALI NOOR JANI KHEL
115	SHER AJAM KHAN	11101-5680119-1	LAB ATTENDANT (BPS-3)	BANNU	15-09-91	14-07-12	16-07-07	GHS AL-HAMID WALI NOOR JANI KHEL
116	WAZIR ABAD	11101-1509539-1	CHOWKIDAR (BPS-3)	BANNU	10-10-75	09-10-12	20-03-91	GPS DUDI KHEL
117	ZAIN ULLAH KHAN	11101-7133333-3	CHOWKIDAR (BPS-3)	BANNU	22-05-85	09-10-12	29-08-02	GPS KOTKA TOOR KHAN
118	ASGHAR ALI SHAH	11102-0342017-5	CHOWKIDAR (BPS-3)	BANNU	01-03-94	09-10-12	24-06-17	GPS ADAMI MAHAZ SHAH
119	MUHAMMAD ISRAHIM	11102-0343141-3	CHOWKIDAR (BPS-3)	BANNU	22-03-94	09-10-12	15-06-11	GPS ALIM SHAH
120	ZAHID ULLAH KHAN	11101-2413255-9	LAB ATTENDANT (BPS-3)	BANNU	15-03-90	23-10-12	13-11-06	GHS HAJIM HAVED
121	NOOR ZALI SHAH	11101-2514632-9	LAB ATTENDANT (BPS-3)	BANNU	28-04-92	07-03-13	16-07-08	GHS NO.2 BANNU
122	MIR ALAM JAN	11101-1503985-5	BEARER (BPS-3)	BANNU	18-04-88	14-03-07	06-08-13	GHS NO.1 BANNU
123	AKBAR KHAN	22201-3426610-3	CHOWKIDAR (BPS-3)	BANNU	10-08-84	25-10-13	05/08/06	GPS BACHAGI JANI KHEL
124	FAZAL ZAMAN	11101-7796541-5	CHOWKIDAR (BPS-3)	BANNU	12-03-89	25-10-13	26/6/12	GPS BAHADER ZAMAN SARDI KHEL
125	MUNAWAR SHAH	11101-9365909-7	CHOWKIDAR (BPS-3)	BANNU	08-08-89	25-10-13	26-06-06	GPS KOTKA AMBER SHAH
126	AJMAL KHAN	11101-2554737-7	LAB ATTENDANT (BPS-3)	BANNU	20-08-89	25-10-13	15-06-10	GHS AJMAL BARLASHTI DAUD SHAH BANNU
127	QADER ZADA	11101-8798725-7	CHOWKIDAR (BPS-3)	BANNU	02-05-91	25-10-13	26-06-06	GPS MUSA KHEL BAHRAM
128	MASHAL KHAN	11101-4862703-5	SWEEPER (BPS-3)	BANNU	01-01-95	25-10-13	17-06-13	GMS KURRI SHEIKHAN
129	HAJI GUL KHAN	11101-6384446-3	NAIB QASID (BPS-3)	BANNU	06-04-97	25-10-13	17-06-13	GMS KURRI SHEIKHAN
130	WALI ANDAZ	11101-8461035-1	CHOWKIDAR (BPS-3)	BANNU	22-03-84	26-10-13	23-06-05	GPS DHANDI WAZIR
131	SYED HABIB SHAH	11101-2601456-7	CHOWKIDAR (BPS-3)	BANNU	15-02-92	26-10-13	21-07-12	GPS CHE GARNI MAMASH KHEL
132	BILAWAR KHAN	11101-5732996-5	CHOWKIDAR (BPS-3)	BANNU	07-04-92	29-10-13	2008	GPS GUL PAYOO BARM KHEL
133	BILAWAR KHAN	11101-5732996-5	CHOWKIDAR (BPS-3)	BANNU	07-04-92	29-10-13	16-09-08	GPS KOTKA GUL PAYO
134	MIR ABAT KHAN	11101-4333936-1	CHOWKIDAR (BPS-3)	BANNU	01-11-89	11-11-13	12/6/12	GPS MIR ABBAS KHAN BAKA KHEL
135	SHAH NARAZ KHAN	11101-1031407-3	CHOWKIDAR (BPS-3)	BANNU	05-03-90	12-02-11	11-11-13	GPS SOKARI JABAR NO. 1
136	Sameen Jan	11101-4306533-1	BPS-3	BANNU	25-01-94	22-11-13	23-11-10	
137	MIR QAWAZ KHAN	11101-6577701-9	NAIB QASID (BPS-3)	BANNU	15-03-78	13-11-13	1996	GHS DOMEL
138	MUHAMMAD SHERIN	11101-4675246-7	CHOWKIDAR (BPS-3)	BANNU	24-02-87	25-11-13	15-06-03	GPS SHEIKH MAHMOOD KAKKI
139	UMER NAWAZ KHAN	11101-8595044-1	CHOWKIDAR (BPS-3)	BANNU	04-09-95	01-01-14	13-08-11	GHS BANNU
140	RAD KHAN	11101-8220218-9	NAIB QASID (BPS-3)	FR BANNU / WAZIR	01-11-88	11-01-14	19-06-04	GHS DOMEL
141	JEHAN ZEB	11101-6998479-7	CHOWKIDAR (BPS-3)	BANNU	25-03-89	11-01-14	07-11-06	GPS WAZIR ABAD MARGHALI

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	NAWEEZ ULLAH KHAN	MUHAMMAD GULAM KHAN	11101-5453540-3	CHOWKIDAR (EPS-3)	BANNU	01-04-78	24-07-74	1997	GPS WAKO
	MUHAMMAD JAVED KHAN	MUHAMMAD ISMAIL	11101-9582924-5	CHOWKIDAR (EPS-3)	BANNU	05-05-84	26-04-14	31-01-83	GPS WANDA GHAKIP
131	MUHAMMAD ARSHAD	MIR ABDUR RAHMAN	11101-0487374-3	CHOWKIDAR (EPS-3)	BANNU	15-10-83	03-04-14	26-05-06	GPS SAHAR MALIK KHEL DISTRICT OFFICE
132	GOHAR AYUB KHAN	GHULAM QADIR KHAN	11101-1726684-3	CHOWKIDAR (EPS-3)	BANNU	28-01-83	05-05-14	22-11-13	GPS ZAKEDA KHEL KHEL
133	QIBAZ KHAN	UMER DARAZ KHAN	11101-4612624-9	CHOWKIDAR (EPS-3)	BANNU	04-04-87	02-08-14	19-06-14	GPS DLASA KHAN MANDER
134	NAHEED ULLAH	FARHAT ULLAH	11101-5416153-5	CHOWKIDAR (EPS-3)	BANNU	22-04-87	11-08-14	25-08-03	GPS KAMAR KELA
135	ZOHAB KHAN	NAFID ULLAH	11101-5522724-9	CHOWKIDAR (EPS-3)	BANNU	02-02-94	23-08-14	13-05-11	GPS SHAFIQ ZAMAT KHEL NO.5 BPS
136	AFNAN KHAN	RASOOL ZAMAN	11101-5835588-7	CHOWKIDAR (EPS-3)	BANNU	01-01-82	02-09-14	12-05-12	GPS PASOOL ZAMAN MANDER
137	RAHMAN ULLAH	BANARAZ KHAN	11101-7230975-3	CHOWKIDAR (EPS-3)	BANNU	07-05-95	02-09-14	17-06-11	GPS DLASA KHAN MANDER
138	ABDUL HAMEED KHAN	MUHAMMAD JALIL SHAH	11101-4700069-1	CHOWKIDAR (EPS-3)	BANNU	15-11-75	10-08-14	04-04-94	GPS KOTKA MUHAMMAD YOUSUF MANDER
139	UMER SHAH	ASLAM KHAN	11101-8950617-3	CHOWKIDAR (EPS-3)	BANNU	01-05-89	11-09-14	17-06-13	GPS WADAN KELA (ISLAM MEMBER)
140	ALLAH NOOR KHAN	GUL AZAD KHAN	11101-9913788-9	CHOWKIDAR (EPS-3)	BANNU	14-03-78	25-11-14	01-06-95	GPS PIR KHEL KAKO NO.1
141	MUHAMMAD RAHMAN	RAB NAWAZ	11101-1487052-3	CHOWKIDAR (EPS-3)	BANNU	05-03-74	03-12-14	20-07-91	GPS GUL SHAM
142	DIL DARAZ KHAN	ZAR WALI SHAH	11101-7882727-7	COOK (BPS-3)	BANNU	01-07-75	18-11-10	2014	GHS NO.2 BANNU
143	NAIMAT ULLAH KHAN	MIR JANAT KHAN	22201-3660514-7	CHOWKIDAR (EPS-3)	BANNU	15-05-79	30-01-15	4-7-1996	GPS MALIK MURAD JUNA BAKA KHEL
144	ZAHOR ANWAR	MAQSOOD ANWAR	11101-2609811-7	CHOWKIDAR (EPS-3)	BANNU	02-02-85	12-03-15	23-12-00	GPS PIR FIDA HUSSAIN (BANNU KHEL)
145	ZIA UR REHMAN	ABDUL JANAN	11101-4671733-3	CHOWKIDAR (EPS-3)	BANNU	02-01-91	12-03-15	10/08/08	GPS RASID ULLAH WALI NOOR JAN KHEL
146	MUHAMMAD ISMAIL KHAN	MIR ZAKAM KHAN	11101-8054272-7	SWEEPER (BPS-3)	BANNU	07-05-85	13-03-15	19-06-04	GHS BAZAR AHMAD KHAN
147	MUHAMMAD IBRAR KHAN	MUHAMMAD NAWAZ KHAN	11101-8391169-7	CHOWKIDAR (EPS-3)	BANNU	15-04-87	23-12-06	18-06-15	GPS AMAN ULLAH KAKO
148	MOHAMMAD GUL	MURAD ALI KHAN	11101-4066918-1	CHOWKIDAR (EPS-3)	BANNU	14-03-89	22-11-11	18-06-15	GPS NO. 7 BANNU CITY
149	MUHAMMAD ASIF	ABDUL SATTAR KHAN	11101-7099749-7	CHOWKIDAR (EPS-3)	BANNU	29-03-90	12-07-12	18-06-15	GPS SHER GHULAM SHER KHEL
150	QAISER ALI KHAN	SAHIB MUHAMMAD KHAN	11101-1443034-3	HABI QASID (EPS-3)	BANNU	21-03-70	18-09-15	25-02-08	GOMHS NO.4 BANNU
151	NAZIR ULLAH KHAN	ABDUSATAR	11101-1466557-5	CHOWKIDAR (EPS-3)	BANNU	21-02-80	21-11-15	20-06-98	GPS SOHRAS AZIM KELA
152	SAHIB ZAMAN	GUL ZAMAN	11101-2256753-5	CHOWKIDAR (EPS-3)	BANNU	15-05-81	21-11-15	16-08-98	GPS GUL ZAMAN BHARAT
153	KHALID KHAN	GHULAM BABI KHAN	11101-1822450-1	CHOWKIDAR (EPS-3)	BANNU	20-10-83	21-11-15	22-06-05	GPS BABI KHAN DARDARZ
154	ASHRAF ULLAH KHAN	DIL NAWAZ KHAN	11101-2867888-9	CHOWKIDAR (EPS-3)	BANNU	14-06-84	22-11-15	29-06-02	GPS DELNAWAZ BHARAT
155	SAHIB KHAN	SYED AYAZ	11101-2944095-7	CHOWKIDAR (EPS-3)	BANNU	10-03-86	22-11-15	19-11-03	DEO MALE BANNU
156	HIZB ULLAH KHAN	GUL RAIS KHAN	11101-1576007-3	CHOWKIDAR (EPS-3)	BANNU	01-10-92	21-11-15	15-07-08	GPS KHAN ZAMAN NURAR
157	FARIDULLAH	AKBAR KHAN	11102-0354791-5	LAB ATTENDANT (BPS-3)	BANNU	14-08-94	21-11-15	2011	GHSS PANDA KHEL
158	Muhammad NASIR KHAN	ALI MAT KHAN	11101-8293848-1	CHOWKIDAR (BPS-3)	BANNU	13-03-89	04-02-16	20-06-05	GPS ALI MAT KHATTKAN SURAN

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				BANNU	23-02-95	24-02-95	23-05-95	GPS UTTAM
				BANNU	12-03-96	24-02-96	24-09-96	GPS NO 4 SARI
				BANNU	15-03-88	25-02-88	23-11-95	GPS KHYALAN JAZ KHEL
				BANNU	01-05-97	26-02-88	15-11-97	GPS ABAC KHEL
				BANNU	30-08-92	27-02-88	15-07-08	GPS KOTI SADAT NO 2
				BANNU	07-02-80	29-02-88	03-05-08	GPS SARDAR BIKEN KHEL
				BANNU	15-05-90	10-03-15	29-06-05	GPS KOTKA FARQ ISMAIL KHAN
				BANNU	07-07-91	30-05-16	15-07-08	GPS JAHANGIR LALQZA
				BANNU	25-07-85	04-06-16	03-05-01	GPS BAKUL KHEL
				BANNU	04-09-85	04-06-16	23-12-02	GPS A. CADIR SHAH MANGAR
				BANNU	01-12-88	04-06-16	25/02	GPS MUHAMMAD KHEL MAZR
				BANNU	28-02-92	04-06-16	2007	GPS MIRA KHEL
				BANNU	25-03-92	04-06-16	18-12-08	GPS PAK ISMAIL KHEL
				BANNU	10-04-92	04-06-16	14-11-11	GPS BHANGI KHEL GUL
				BANNU	10-04-95	04-06-16	12-06-12	GPS SHAH QYAZ MAMA KHEL
				BANNU	01-01-96	04-06-16	24-06-17	GPS SUJAMA SIKANDER KHEL NO 2
				BANNU	04-07-97	04-06-16	18-06-15	GPS PANDA KHEL
				BANNU	10-04-94	05-06-16	13-06-11	GPS ZEBA KHEL KICLARY NO 1
				BANNU	20-03-96	05-06-16	13-06-11	GPS KAKU
				BANNU	03-04-91	30-07-16	14-06-09	GPS BARAKSHI SADRANAR
				BANNU	03-01-84	31-10-16	21 June 2008	GPS DEGAN SHAH JALAL
				BANNU	01-07-82	31-10-16	18-6-15	GPS GUL PANZAR SARDI KHEL
				BANNU	25-10-90	31-10-16	16-07-07	GPS KOTI SADAT NO 1
				BANNU	24-03-95	31-10-16	14-11-11	GPS WALI ZAR KILLA
				BANNU	28-04-93	26-12-16	03-05-08	GPS DOMEL
				BANNU	05-10-89	15-02-17	22-11-05	GPS RAQIB BHARAT
				BANNU	05-09-92	15-02-17	23-11-10	GPS AQLIM KHAN KILLA
				BANNU	26-03-96	17-05-17	27-10-17	GPS DOGAR UMARZA
				BANNU	01-02-97	15-02-17	12-06-12	GPS NO 1 BANNU
				BANNU	01-01-99	17-05-17	16-06-16	GPS LAHA KHEL DAUD SHAH
				BANNU	15-08 91	25-05-17	16-07-07	GPS HASSAN KHEL KHERAN
				BANNU	12-01-75	27-07-17	16-07-07	GPS KAUSAR FATEH KHEL
				BANNU	02-09-76	27-07-17	1994	GPS JANI KHEL QHAS
				BANNU	01-02-86	08-08-17	29-06-02	GPS NAR BOSTAN

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Sl. No.	Name	Father's Full Name	CNIC	Description	Domestic	Date of Birth	Date of 1st app	Date of Preparing BEO	Other Details
221	ASHTAR ALI SHAH	ASHTAR ALI SHAH	11101-7383886-1	CHOWKIDAR (EPS-3)	BANNU	7/10/1981	3/14/2020	8/10/1998	GPS ALI SHAH RAJAM
222	SHAH DARAZ KHAN	SHAH DARAZ KHAN	11101-1214482-1	SWEET (EPS-3)	BANNU	3/4/1982	3/14/2020	6/14/2014	GPS AMAN UMER KHAN
223	SYED ILLAH KHAN	SYED ILLAH KHAN	11101-1677586-7	CHOWKIDAR (EPS-3)	BANNU	5/17/1985	3/14/2020	12/23/2002	GPS HAR BILANDER
224	DEL FARAZ KHAN	DEL FARAZ KHAN	11101-6104243-3	CHOWKIDAR (EPS-3)	BANNU	3/24/1987	3/14/2020	6/15/2007	GPS KHOLELA BHARAT
225	MUHAMMAD GHULAM	MUHAMMAD GHULAM	11101-900548-5	CHOWKIDAR (EPS-3)	BANNU	3/20/1989	3/14/2020	11/22/2006	GPS AZHAFAT KAZI
226	GHULAM ALI	GHULAM ALI	11101-6216481-7	CHOWKIDAR (EPS-3)	BANNU	5/5/1989	3/14/2020	7/26/2006	GPS SHAGI MOHAMMED NO.2
227	MUHAMMAD ABBAS	MUHAMMAD ABBAS	11101-1147508-1	US ATTENDANT (EPS-3)	BANNU	8/5/1989	3/14/2020	11/13/2006	GPS DANCI WAZIR
228	DARWAZ KHAN	DARWAZ KHAN	11101-4797751-1	SWEET (EPS-3)	BANNU	4/15/1990	3/14/2020	2004	GPS DANCI WAZIR
229	INQAS ULLAH	INQAS ULLAH	11101-1191112-9	US DASH (EPS-3)	BANNU	3/12/1991	3/14/2020	1/14/2008	GPS MAMA KHEL BANUCH
230	ISMAIL KHAN	GUL MUHAMMAD KHAN	11101-8587071-3	CHOWKIDAR (EPS-3)	BANNU	3/10/1992	3/14/2020	7/15/2008	GPS MAMA KHEL BANUCH
231	MOST MUHAMMAD KHAN	ZAR DAD KHAN	11101-1479831-	US DASH (EPS-3)	BANNU	2/11/1983	9/78/2021	6/15/1999	SOEO MALE KAKO
232	Muhammed Kazi	Farooq Kazi	11101-3241720-5	CHOWKIDAR (EPS-3)	BANNU	3/11/1992	3/14/2020	6/15/2008	GPS TORE KAKO
233	NASIR MUHAMMAD KHAN	NASRULLAH JAN	11101-6355744-9	CHOWKIDAR (EPS-3)	BANNU	9/10/1992	3/14/2020	6/15/2010	GPS KOTKA GHULAM JAN
234	AMIR SAAD ULLAH KHAN	AMIR SAAD ULLAH KHAN	11101-5786092-1	CHOWKIDAR (EPS-3)	BANNU	8/10/1994	3/14/2020	6/17/2013	GPS SADAN MAJASH KHEL NO.2
235	PRANVE ULLAH KHAN	SYED ASLAM SHAH	11201-497423-9	CHOWKIDAR (EPS-3)	BANNU	5/2/1995	3/14/2020	6/12/2012	GPS MERAICH KILLA
236	ISTED ZUBAR SHAH	ABDUL LATIF	11102-0349519-9	CHOWKIDAR (EPS-3)	BANNU	2/15/1996	3/14/2020	6/18/2015	GPS MONULLAH LANGI JALANDER
237	ARIF ULLAH	SANA ULLAH KHAN	11101-1332751-7	CHOWKIDAR (EPS-3)	BANNU	2/15/1996	3/14/2020	6/12/2012	GPS AMAN UMER KHAN
238	RAHAT ULLAH	NAJIB ULLAH KHAN	11101-3294616-9	CHOWKIDAR (EPS-3)	BANNU	3/15/1996	3/14/2020	6/12/2012	GPS KHARULLAH KAKO
239	AMAN ULLAH KHAN	NAJMAT ULLAH KHAN	11101-1892725-7	CHOWKIDAR (EPS-3)	BANNU	4/20/1996	3/14/2020	6/12/2012	GPS JADID ABADI BANNU CITY NO.10
240	HEDAYAT ULLAH KHAN	SARABAI	11101-6171856-3	CHOWKIDAR (EPS-3)	BANNU	3/31/1997	3/14/2020	12-06-12	GPS SHAISTA BAKA KHEL
241	SHAHID KHAN	KHMER ZAMAN	11101-3205956-9	US ATTENDANT (EPS-3)	BANNU	3/31/1997	3/14/2020	6/17/2013	GPS AMAN UMER KHAN
242	KHAN ULLAH KHAN	ASMAT ULLAH KHAN	11101-5756464-3	CHOWKIDAR (EPS-3)	BANNU	8/29/1997	3/14/2020	6/17/2013	GPS HANUM HAVED
243	MUHAMMAD TAYYAB	HAYAT ULLAH KHAN	11101-1083881-3	US DASH (EPS-3)	BANNU	8/30/1997	3/14/2020	6/17/2013	GPS HANUM HAVED
244	MUHAMMAD ULLAH KHAN	MUJEEB ULLAH KHAN	11101-7223871-1	SWEET (EPS-3)	BANNU	9/30/1997	3/14/2020	6/14/2014	GPS AMAL BARLASHTI DAUD SHAH BANNU
245	AFGAN ULLAH KHAN	SHAHEEN ULLAH KHAN	11101-3938099-1	CHOWKIDAR (EPS-3)	BANNU	4/21/1998	3/14/2020	6/18/2015	GPS MUHAMMAD KHAN KAKO
246	MUHAMMAD SHAFI ULLAH KHAN	MIR BAZ KHAN	11101-5490011-5	US ATTENDANT (EPS-3)	BANNU	5/5/1998	3/14/2020	6/14/2014	GPS MAMA KHEL BANUCH
247	ZAKIR KHAN	FAZAL WAHAB KHAN	11101-9042243-1	CHOWKIDAR (EPS-3)	BANNU	8/30/1998	3/14/2020	6/14/2014	GPS HANUM HAVED
248	IMAD ULLAH	FARID ULLAH KHAN	11102-0362007-5	CHOWKIDAR (EPS-3)	BANNU	9/4/1998	3/14/2020	6/17/2013	GPS DANCI WAZIR
249	ISRAR AHMAD	ZAFAR ULLAH	11101-4737467-9	CHOWKIDAR (EPS-3)	BANNU	5/4/2000	3/14/2020	6/22/2016	GPS AKHTAR ZAMAN MAST AMIR TUGHAL KHEL
250	TAMIR NAWAZ	AKHTAR ZAMAN	11101-9665581-7	CHOWKIDAR (EPS-3)	BANNU	4/9/2000	3/14/2020	22-07-20	GPS PALOSI WAZIR
251	MUHAMMAD JUNAID KHAN	WAKEEL NAWAZ	11101-9046008-5	US DASH (EPS-3)	BANNU	3/15/2001	3/14/2020	6/22/2016	GPS BANCI KHEL SOBRAN
252	SAAD ASHRAF	ISRAR KHAN	11101-3629561-9	CHOWKIDAR (EPS-3)	BANNU	8/31/2001	3/14/2020	6/24/2017	GPS MURAR
253	VIARIS KHAN	ASHRAF ALI	11101-0878443-7	US DASH (EPS-3)	BANNU	3/1/2002	3/14/2020	6/24/2017	GPS NO. 7 BANNU CITY
254	FAIZAN KHAN	ZUBAIR KHAN	11101-9466737-9	CHOWKIDAR (EPS-3)	BAJAUR	5/5/1998	12/23/2017	9/2/2021	GPS PAGAU JHANDO KHEL



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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Peshawar, dated the 28th January, 2013

NOTIFICATION

No.SO(PE)/4-10/SSRC/Ministerial Staff/2013:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules,1989, and in supersession of all rules issued in this behalf to the extent of the Elementary and Secondary Education Department the (E&SE Department) in consultation with the Establishment Department and Finance Department hereby lays down the method of recruitment, qualifications and other conditions specified in Column 3 to 5 of the Appendix to this Notification which shall be applicable to the posts borne on the ministerial establishment in the Elementary and Secondary Education Department specified in Column No.2 of the said Appendix.

APPENDIX

S. NO	NOMENCLATURE	MINIMUM QUALIFICATION AND EXPERIENCE FOR INITIAL APPOINTMENT OR BY TRANSFER	AGE LIMIT	METHOD OF RECRUITMENT (EXISTING)
1	2	3	4	5
1.	Deputy Director (Finance and Accounts) /Deputy Director (Administration) (BPS-18)		-	By promotion on the basis of seniority-cum-fitness from amongst the Assistant Directors (Finance and Accounts) & Assistant Directors (Administration) with at least five years service as such.
2.	Assistant Director (Finance and Accounts) / Assistant Director (Administration) (BPS-17)		-	By promotion on the basis of seniority cum fitness from amongst the Budget and Accounts Officers with at least two years service as such.
3.	Budget and Accounts Officer. (BPS-16)		-	By promotion on the basis of seniority cum fitness from amongst the Superintendents with at least two years service as such.
4.	Superintendent (BPS-16)		-	By promotion on the basis of seniority cum fitness amongst the holders of the posts of Assistants and Senior Scale Stenographers with at least five years service as such.
5.	Senior Scale	(i) At least Second Class Bachelor's Degree or equivalent	20 to 30	By promotion on the basis of seniority cum

update (m)
For Record
and further
Not as required
per the Rules
10/30/13
15/2/13

(1)

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	Stenographers (BPS-16)	qualification from a recognized University; (ii) Speed of Seventy words per minute in shorthand in English and Forty Five words per minute in typing; and (iii) Knowledge of Computer in using MS words and MS Excel.	Years	fitness from amongst the Junior Scale Stenographers (BPS-14) with at least five years service as such.
6.	Assistant (BPS-14)	At least Second Class Bachelor's Degree from a recognized University	20 to 30 Years	(a) Seventy five per cent by promotion, on the basis of seniority-cum-fitness from amongst the Senior Clerks with at least five years service as such; and (b) Twenty five per cent by initial recruitment
7.	Junior Scale Stenographers (BPS-14)	(i) Intermediate or equivalent qualifications from a recognized Board; (ii) Speed of Fifty words per minute in shorthand in English and Thirty Five words per minute in typing; and (iii) Knowledge of Computer in using MS words and MS Excel.	18 to 30 Years	By Initial recruitment
8.	Senior Clerks (BPS-09)			By promotion on the basis of seniority cum fitness from amongst the Junior Clerks, Assistant Store Keepers and Laboratory Assistants with at least two years service as such.
9.	Junior Clerk/Assistant Store Keeper/ Laboratory Assistant (BPS-07)	(i) For Junior Clerk / Assistant Store Keepers having at least Second Division in Secondary School Certificate or equivalent qualifications from a recognized Board and a speed of twenty five words per minute in typing; (ii) For Laboratory Assistants having at least Second Division in Secondary School Certificate or equivalent qualifications from a recognized Board with Science.	18 to 30 Years	(a) Thirty Three per cent by promotion, on the basis of seniority-cum-fitness from amongst the Daftaries, G/Operators, Qasids and Naib Qasids including other equivalent posts in the attached department /offices/institutions with at least Two years service as such and having qualification mentioned in column No. 3. (b) Sixty Seven per cent by initial recruitment Note: - For the purpose of promotion, there shall be maintained a joint seniority list of Daftaries, Gestetner Operators, Qasids, Naib Qasids etc including other equivalent posts in the attached department /offices/institutions with reference to the dates of their regular appointment or acquiring Secondary School Certificate whichever is later.

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10.	Driver (BPS-04)	Having valid Driving License and preferably Literate.	18 to 32 Years	By Initial recruitment
11.	Naib Qasid /Chowkidar/ Behshti/Cook/Bearer/ Shop Attendant/ Laboratory Attendant etc	Preferably Literate	18 to 30 Years	By Initial recruitment

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst.: of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officer (M&F) in Khyber Pakhtunkhwa. *Kohat*
14. All District Account Officer in Khyber Pakhtunkhwa.
15. All Agency Education Officer in FATA
16. All Agency Account Officer-in FATA.
17. PS to Governor Khyber Pakhtunkhwa. Peshawar.
18. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
19. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.



(3)

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OFFICE
ADMINISTRATIVE
30/11/2012

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Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department

No. SOG/E&SE/2-3/2014
Dated Peshawar the 18/07/2014

To: All Directors,
E&SE in Khyber Pakhtunkhwa.

Subject: NOTIFICATION.

I am directed to refer to the subject noted above and to enclose herewith a copy of notification No. SOE-V(E&AD)11-V/2011 dated 08.07.2011 received from Section Officer (E-V), Govt of Khyber Pakhtunkhwa, Establishment Department, Peshawar, which is self-explanatory, for further necessary action.

Part: As above.

M. Khan
Section Officer (General)

Encl: No. & date even

Copy forwarded to the:-

1. Section Officer (E-V), Govt of Khyber Pakhtunkhwa, Establishment Department, Peshawar w/r to her letter cited above.
2. P.S to Special Secretary, E&SE Department.
3. P.A to Deputy Secretary (Admn), E&SE Department.

OFFICE OF THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR

4443-93

Encl: No. /F.No.70:-/G Rules Notification/G.B Dated Pesh: the 5/8/2014

Copy forwarded to the:-

1. All the District Education Officer (Female/Male) in Khyber Pakhtunkhwa.
2. Section Officer (General) Govt of Khyber Pakhtunkhwa Elementary & Secondary Education Department, w/r to his letter No. cited above.
3. Deputy Director Establishment Local Office.
4. PA to Director (E&SE) Local Directorate.

M. Khan
Deputy Director (Establishment)
(E&SE) Khyber Pakhtunkhwa

6) for the existing entries against serial No.11, in respective columns, the following shall respectively be substituted, name:

11.	Junior Clerk (BPS-07)	Secretary	18 to 30 years	<p>(i) Second Class Secondary School Certificate or equivalent qualification from a recognized Board; and</p> <p>(ii) A speed of 30 words per minute in English Typing with knowledge of MSWord.</p>	<p>(a) Twenty per cent (20%) by promotion, on the basis of seniority-cum-fitness, from amongst the Daltaris, who possess Secondary School Certificate or equivalent qualification from recognized Board with atleast three (03) years service as such;</p> <p>Provided that if no suitable Daltari is available for promotion then the posts shall be filled by promotion on the basis of seniority-cum-fitness from amongst Nalb Qasids, Residence Orderly, Mail, Bohishil, Chowkidar and Electrician, who possess Secondary School Certificate or equivalent qualification from recognized Board with atleast three (03) years service as such; and</p> <p>(b) eighty per cent (80%) by initial recruitment.</p> <p><u>Note:</u> The Junior Clerks appointed by promotion shall achieve a speed of thirty (30) words per minute in English typing within six (06) months of their promotion otherwise they shall be reverted;</p>
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In the existing entries against serial No. 14, in the respective columns, the following shall be substituted, namely:

14.	Nais Qasid/ Resident Orderly/Mail/ Behishid/ Chowkidar (GPS-01)	Secretary	18 to 30 years	Middle pass		By initial recruitment; and
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(m) after serial No. 14, in respective columns, the following new entries shall respectively be inserted in the relevant columns, namely:

14(A)	Electrician (GPS-02)	Secretary	18 to 40 years	Middle pass with diploma in the field of electrician.	Five years practical experience of electrical work.	By initial recruitment.
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Chief Secretary,
Khyber Pakhtunkhwa

HD/GPS-VIA/AD/11-3/2011:-

Dated Peshawar, the July 8, 2011

Copy forwarded to -

1. All Administrative Secretaries to Government of Khyber Pakhtunkhwa.
2. The Chairman, Public Service Commission, Khyber Pakhtunkhwa.
3. The Secretary to Governor, Khyber Pakhtunkhwa.
4. The Secretary to Chief Minister, Khyber Pakhtunkhwa.
5. All Heads of Attached Departments, Khyber Pakhtunkhwa.
6. All Heads of Autonomous / Semi Autonomous Bodies in Khyber Pakhtunkhwa.
7. All District and Sessions Judges in Khyber Pakhtunkhwa.
8. The Secretary Board of Revenue, Peshawar.
9. The Director, Anti Corruption Establishment, Peshawar.
10. The Secretary, Public Service Commission, Khyber Pakhtunkhwa.
11. The Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
12. All Deputy Commissioners in Khyber Pakhtunkhwa.
13. Manager, Govt. Printing Press with the request to furnish twenty (20) copies to this Department after publication in the official Gazette.

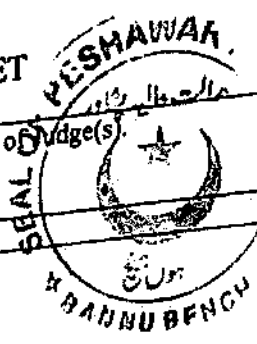
M. Wardan Latif
8/07/2011
(WARDAN LATIF)
Section Officer (E-1)

Printed

PESHAWAR HIGH COURT, BANNU BENCH

FORM OF ORDER SHEET

Date of Order or proceedings (1)	Order or other proceedings with signature of Judge(s) (2)
29.05.2024	<p>C.O.C.No. 144-B/2019. Present: Mr.Nasib-ur-Rehman, advocate for petitioner. *** <u>Dr.Khurshid Iqbal, J.-</u> Through this contempt of court petition, the petitioner has prayed for the following relief:</p> <p>On acceptance of this contempt of court petition, this Hon'ble Court may very graciously be pleased to initiate contempt of court proceedings against respondent-EDO,Bannu. This Hon'ble Court may further be pleased to redirect the respondent to implement order of this Hon'ble Court in W.P.# 189-B/2017 in letter and spirit. This Hon'ble Court may further be pleased to direct the respondent to appoint the petitioner according to law. Any other relief, if, deemed fit and appropriate in the interest of justice.</p> <p>2. Learned counsel for petitioner contended that in spite of clear cut directions to the petitioner vide judgment and order of this Court dated 22.10.2017, the petitioner has not been appointed up till now. The reply was sought from the respondents, which was duly submitted and as per reply, the petitioner's father retired after qualifying service on completion of 26 years service and not on superannuation.</p>



ATTESTED
 EXAMINER
 Peshawar High Court,
 Bannu Bench

Inqamullah P.S (D.B) Hon'ble Mr. Justice Kamran Hayat Mian Khel & Hon'ble Mr. Justice Dr.Khurshid Iqbal

A handwritten signature in black ink, likely belonging to one of the judges mentioned in the footnote.

3. The perusal of the record reveals that as per *order* which is annexed with the reply, it is mandatory that 25% quota falling to the share of initial recruitment in BPS-01 to PBS-04, is reserved for appointment of one of the children of a retiring civil servant on Superannuation and not for an employee retired on qualifying service. Thus, petitioner's father being retired on qualifying service and not on Superannuation, therefore, the petitioner is not entitled to the 25% quota reserved for appointment of one of the children of a retiring civil servant.

4. The learned counsel for petitioner produced an appointment order vide which one Zahid Khan s/o Mir Atlas Khan was also appointed as *Naib Qasid* on Retired Employees Son Quota, whereas, the father of the appointee Zahid Khan also retired on qualifying service on his own request, but this contention of the learned counsel does not persuade us to hold, otherwise, as two wrongs cannot make one right. This Court being Court of law cannot perpetuate a wrong to continue in the name of discrimination. Hence, for the above cited reasons, this petition being bereft of any merit is hereby dismissed.

SCANNED
30 MAY 2024
Khalid Khan

Announced
Dt: 29.05.2024.

Sd/ Mr. Justice Kamran Hayat Miankhel, J
Sd/ Mr. Justice Dr. Khurshid Iqbal, J

[Handwritten signature]
30/5

CERTIFIED TO BE TRUE COPY

[Handwritten signature] 30/05/2024
Examiner
Peshawar High Court, Bannu Bench
Authorised Under Article 87 of
The Constitution of Pakistan

[Handwritten signature]