

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

**Service Appeal No. 1933/2024**

Pir Khan.

...APPELLANT

**VERSUS**

Government of Khyber Pakhtunkhwa through secretary.

...RESPONDENTS

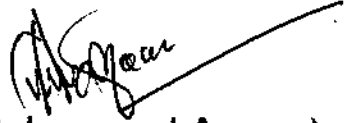
**APPLICATION FOR SUBMISSION OF OBJECTION  
INDEX**

S.No.	Description of Document	Annexures	Page No.
1.	Application for submission of documents	--	1-2
2.	Copy of minutes of meetings.	"A"	3-4
3.	Copy of Objection	"B"	5
4.	Vakalat Nama is already placed on file	--	

...APPELLANT

**Through:**

**Dated: 9/9/2024**

  
**(Sardar Muhammad Azeem)**  
Advocates High Court, Abbottabad.

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

**Service Appeal No. 1933/2024**

Pir Khan.

**V E R S U S**

...APPELLANT

**Khyber Pakhtunkhwa  
Service Tribunal**

Diary No. 15834

Dated 18.09.2024

...RESPONDENTS

Government of Khyber Pakhtunkhwa through secretary.

-----  
APPLICATION FOR SUBMISSION OF  
OBJECTION OF THE APPELLANT AGAINST  
SENIORITY LIST YEAR 2017 AND MINUTES OF  
MEETING DATED 28.08.2017 ACCORDING TO  
THE DIRECTION OF THIS HONOURABLE  
TRIBUNAL.  
-----

*Respectfully Sheweth,*

1. That the above titled appeal is pending before this Honourable Tribunal for preliminary hearing on 26.09.2024.
2. That this Honourable Tribunal was gave direction to Appellant for submission of objection against Seniority list of P,S,T year 2017 , and

minutes of meeting regarding promotion of P,S,T dated 28.08.2017.

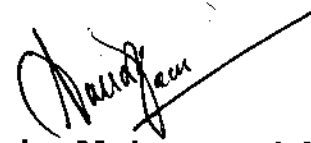
3. That the appellant is filling of minutes of meeting regarding promotion of P,S,T and objection which was submitted by the appellant against seniority list of P,S,T "**which are annexed as Annexure (A,B)**"

4. It is therefore respectfully prayed that documents mentioned in the application may kindly be placed with the appeal.

...APPELLANT

**Through:**

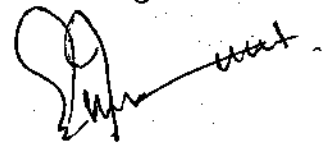
**Dated: 9/4 /2024**



**(Sardar Muhammad Azeem )**  
Advocates High Court, Abbottabad.

**VERIFICATION:-**

Verified that the contents of the instant <sup>Application</sup> are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honorable Court.



**Dated: 9/4 /2024**

...APPELLANT

20/11/16

میرزا محمد رفیق (مقدم) کے خلاف ریفرنس نمبر 15/162017 (مقدم)

میرزا محمد رفیق (مقدم) کے خلاف ریفرنس نمبر 15/162017 (مقدم) کے تحت  
مقدم نے ریفرنس نمبر 15/162017 (مقدم) کے تحت  
ریفرنس نمبر 15/162017 (مقدم) کے تحت  
ریفرنس نمبر 15/162017 (مقدم) کے تحت  
ریفرنس نمبر 15/162017 (مقدم) کے تحت  
ریفرنس نمبر 15/162017 (مقدم) کے تحت  
ریفرنس نمبر 15/162017 (مقدم) کے تحت  
ریفرنس نمبر 15/162017 (مقدم) کے تحت  
ریفرنس نمبر 15/162017 (مقدم) کے تحت  
ریفرنس نمبر 15/162017 (مقدم) کے تحت

Sardar Azeem Advocate  
High Court Abbottabad

مقدم نے ریفرنس نمبر 15/162017 (مقدم) کے تحت

مقدم نے ریفرنس نمبر 15/162017 (مقدم) کے تحت  
ریفرنس نمبر 15/162017 (مقدم) کے تحت  
ریفرنس نمبر 15/162017 (مقدم) کے تحت  
ریفرنس نمبر 15/162017 (مقدم) کے تحت  
ریفرنس نمبر 15/162017 (مقدم) کے تحت  
ریفرنس نمبر 15/162017 (مقدم) کے تحت  
ریفرنس نمبر 15/162017 (مقدم) کے تحت  
ریفرنس نمبر 15/162017 (مقدم) کے تحت  
ریفرنس نمبر 15/162017 (مقدم) کے تحت  
ریفرنس نمبر 15/162017 (مقدم) کے تحت

مقدم نے ریفرنس نمبر 15/162017 (مقدم) کے تحت

A  
3

(B) (4)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD.  
MINUTES OF THE MEETING OF DEPARTMENTAL PROMOTION COMMITTEE

FOR PROMOTION OF PST BPS-12 TO SPST BPS-14] & SPST to PSHT

A meeting of the Departmental Promotion Committee was held on 28.8.2017 at 10.00 AM under the chairmanship of District Education Officer (Male) Abbottabad to discuss the promotion of PST B-12 to SPST(BPS-14) & SPST to PSHT (B-15) in the Elementary & Secondary Education Department Abbottabad. The following attended the meeting.

- |   |          |
|---|----------|
| 1 Mr. Qazi Tajamal<br>Hussian District<br>Education Officer<br>(Male) Abbottabad                                | In Chair |
| 2 Muhammad Ashraf<br>Dy: District<br>Education Officer<br>(Male) Abbottabad                                     | Member   |
| 3 Faiza Shafi District<br>Education Officer<br>(Female)<br>Abbottabad (Rep: of<br>Director E&SEKPK<br>Peshawar) | Member   |

The meeting started with recitation from the Holy Quran. The chair welcomed the participants and apprised that the following PST and SPST are recommended for promotion to the post of PST to SPST and SPST to PSHT.

In accordance with the method of recruitment policy notified vide Secretary to the Government of Khyber Pakhtunkhwa and Secondary Education No. SO (PE) 14-5/SSRC/Meeting /2012 / teaching cadre dated 13/11/2012 and further notification No. SO/(B&A)/1-18/E&SE/2012 Dated 16/07/2012 duly endorsed by Finance Deptt: Endst: No. SO (FR) FD/10-22(E)2010 Dated 16/07/2012.

The single point agenda of promotion of PST B-12 to SPST B-14 was discussed in detail in the light of appointment policy referred above on the criteria as per breakup of sanctioned posts issued by the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar as stood on 05/06/2012.

A committee were constituted to scrutinize the required working papers who submitted their recommendations of promotions of PST B-12 to SPST B-14 & one SPST to PSHT. As per working paper Sr. No. 9 is recommended for promotion to PSHT while others to SPST.

Sr	S/ list#	Name of Teacher	Present place of posting	Date of Birth	D/O 1st Apptt:	D/o 1st apptf as PST (Trained)	Qualifications		Remarks
1	2	3	4	5	6	7	8	9	10
1	70	M. Rafique PST	GPS Bandi	02/02/1960	18/12/1980	30/09/1982	FA	PTC	PST to SPST
2	374	Basheer Ahmad PST	GPS Barian	04/02/1962	02/08/1982	29/11/1987	FA	PTC	PST to SPST
3	394	Said Akbar PST	GPS MAIRA	01/04/1964	25/04/1983		FA	PTC	PST to SPST
4	981	M. Irshad PST	GPS Bomochi	04/04/1972	27/02/1993	27/02/1993	FA	PTC	PST to SPST
5	1180	Muhammad Shafique PST	GPS Sail	30/04/1971	22/10/1994	22/10/1994	BA	PTC	PST to SPST
6	1511	Nisar Ahmed PST	GPS Pona	12/03/1972	19/09/1995	01/04/1996	FA	PTC	PST to SPST
7	1652	Arjad Mehmood PST	GPS Chando	12/04/1976	12/12/1995	13/05/1997	FA	PTC	PST to SPST
8	1786	Muht Asad PST	GPS Nammal	02/04/1973	24/07/1997	24/07/1997	FA	PTC	PST to SPST
9	1790	Waseem Anwar SPST	GPS Biga Kote	12.9.1974	26/7/1997	26/7/1997	FA	PTC	SPST to PSHT
10	1860	Muhammad Hanif PST	GPS Palkot	01/05/1974	20/04/1999	20/04/1999	FA	PTC	PST to SPST
11	1903	Shabbir Hussian Shah PST	GPS Amlela	2812/1970	21/04/1999	05/03/1997	FA	PTC	PST to SPST


*Attended*  
**Saifur Mujahid**  
Azeem Advocate  
High Court Abbottabad

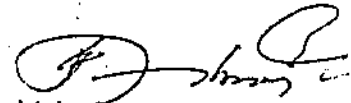
5

117

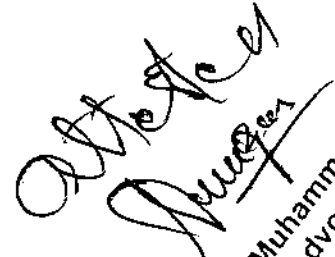
14	Fazzeb PST	GPS Ghori	04/12/1976	21/03/2000	21/03/2000	FA	PTC	PST to SPST
15	2071 Afraiz Ahmed PST	GPS Ander	03/04/1978	15/04/2005	15/04/2005	FA	PTC	PST to SPST
15	2158 Muhammad Tariq PST	GPS Tatial	01/01/1974	15/02/1995	20/06/2006	FA	PTC	PST to SPST
16	2191 Mushraf Khan PST	GPS Noshera	15/03/1981	22/12/2010	22/12/2010	BA	PTC	PST to SPST
16	2195 Muhammad Kabeer PST	GPS Bakote	23/10/1982	22/12/2010	22/12/2010	BA	PTC	PST to SPST

The meeting ended with a vote of thanks to and from the chair.

  
Qazi Tajamal Hussian  
District Education Officer  
(M) Abbottabad

  
Muhammad Ashraf  
Dy: District Education Officer  
(M) Abbottabad

Faiza Shafi  
District Education Officer  
(Female) Abbottabad  
(Rep: of Director E&SEKPK Peshawar)

  
Sardar Muhammad  
Azeem Advocate  
High Court Abbottabad