


Form-A

FORM OF ORDERSHEET

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

Case No. 1987/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	15.10.2024	<p>As per direction of the Hon'ble Member Judicial the present appeal is fixed for preliminary hearing before Single Bench at Peshawar on 22.10.2024. Counsel for the appellant has been informed telephonically.</p> <p style="text-align: right;"> REGISTRAR</p>

The appeal of Mr. Muhammad Imtiaz Ali received today i.e on 01.10.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of seniority list dated 01.08.2024 mentioned in the memo of appeal is not attached with the appeal be placed on it. Copy of seniority list attached with the appeal having no date.

No. 851 /Inst./2024/KPST,

Dt. 01/10 /2024.

*Anwar Ullah*  
ADDITIONAL REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Mahmood Jan Adv.  
High Court at Peshawar.

*Sir,*

*The identical appeals titled Babu Gul & 19 Others vs Education Deptt. have already been admitted for regular hearing and the are fixed for reply on 04/11/2024, therefore, the appeal in hand may very kindly be checked with the same.*

*As per*  
*14/10/2024*

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**



APPEAL NO. 768 /2024

Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar  
Registry No. 13035  
Dated 29-08-2024

Mr. Sher Ghulam, PST (BPS-12),  
GPS No.3, Pishtakhara, Peshawar.....APPELLANT

**VERSUS**

- 1- The Director Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
  - 2- The District Education Officer (M), District Peshawar.
- .....RESPONDENTS

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED SENIORITY LIST DATED 01.08.2023 ISSUED BY THE RESPONDENT NO.2 IN RESPECT OF PRIMARY SCHOOL TEACHERS (BPS-12) OF DISTRICT PESHAWAR WHICH IS VIOLATIVE OF THE PROVISIO TO SECTION-4(2) OF THE APPOINTMENT AND REGULARIZATION ACT, 2017 AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL**  
**APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS**

**PRAYER:**

That on acceptance of this service appeal the impugned seniority list dated 01/08/2023 may very kindly be declared as illegal, unlawful and ineffective upon the rights of appellant and the respondents may please be directed to prepare/issue a fresh seniority list as per Proviso to Section-4(2) of the Appointment and Regularization Act, 2017. Any other relief which this august court deems appropriate may also be granted in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

*Brief facts of the present appeal are as under:-*

- 1- That the appellant was appointed as Primary School Teacher (BPS-12) on 21.09.2016 through NTS. That right from the date of initial appointment the appellant is performing his duty at the concerned station quite efficiently and upto the entire satisfaction of his superiors. Copy of the appointment order is attached as annexure.....A.

**ATTESTED**

**EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar**


09-10-24

SA 768/2024

10.07.2024

01. Counsel for the appellant present and requested for some time to file certified/authentic seniority list on file. He may do so within a week and case to come up for preliminary hearing on 25.07.2024 before the S.B. PP given to learned counsel for the appellant.

SCANNED  
KPST  
Peshawar

  
(Fareeha Paul)  
Member(I)


\*Fazle Subhan, P.S\*

25<sup>th</sup> July, 2024

Learned counsel for the appellant present and heard.

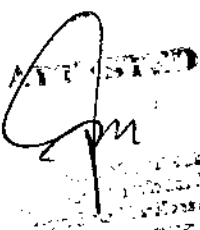
Let pre-admission notice be given to other side to submit reply. Respondents be summoned through TCS, the expenses of which shall be deposited by the appellant within 10 days. To come up for reply/comments as well as preliminary hearing on 20.08.2024 before the S.B.

Alongwith memorandum of appeal, the appellant has also filed an application for restraining the respondents from making promotion on the basis of disputed seniority list till the final disposal of the instant appeal. Notice of the same be also issued to the respondents for the date fixed. Parcha Peshi given to learned counsel for the appellant.

  
(Aurangzeb Khattak)  
Member (Judicial)

\*Naeem Amir\*

SCANNED  
KPST  
Peshawar

  
08-10-2024

Date of Presentation of Application 08-10-2024  
Number of Words 1-P  
Copying Fee 5/-  
Urgent 5/-  
Total 10/-  
Name of Copyist \_\_\_\_\_  
Date of Completion 08-10-2024  
Date of Delivery of Copy 08-10-2024



20.08.2024

01. Learned counsel for the appellant present. Mr. Arshad Azam, Assistant Advocate General alongwith Mr. Muhammad Bilal, ADEO for the respondents present.

02. Reply/comments on behalf of respondents not submitted. Representative of the respondents requested for time to submit reply/comments. Granted. To come up for reply/comments as well as preliminary hearing on 10.09.2024 before S.B. P.P given to the parties.

ATTESTED

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar  
08-10-2024

(Muhammad Akbar Khan)  
Member (E)

Date of Presentation of Application	08-10-2024
Number of Words	1-9
Copying Fee	5/-
Stamp	5/-
Total	10/-
Number of Pages	
Date of Demand	08-10-2024
Date of Demand	08-10-2024



23.09.2024

Learned counsel for the appellant present and requested

that similar nature service appeal No. 768/2024 titled "Sher Ghulam Versus Government of Khyber Pakhtunkhwa" had been fixed for 10.10.2024, therefore, the instant appeal may also be fixed for the said date. Request is allowed. File to come up for preliminary hearing on 10.10.2024 before the S.B alongwith the above mentioned service appeal. P.P given to learned counsel for the appellant.

ATTESTED  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
08-10-24

(Muhammad Akbar Khan)  
Member (E)

\*Kamranullah\*

Date of Presentation of Application	08-10-24
Number of Words	1-P
Copying Fee	5/-
Stamp	5/-
Total	10/-
Name of Applicant	
Date of Case	08-10-24
Date of Delivery	08-10-24

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

APPEAL NO 1957/2024

MUHAMMAD IMTIAZ ALI                      VS                      EDUCATION DEPTT:

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APPELLANT

THROUGH:

  
MAHMOOD JAN  
ADVOCATE



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

APPEAL NO. 1987 / 2024

Mr. Muhammad Imtiaz Khan, PST (BPS-12),  
GPS Gulshan Rehman Colony, Peshawar.....APPELLANT

**VERSUS**

- 1- The Director Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
  - 2- The District Education Officer (M), District Peshawar.
- .....RESPONDENTS

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED SENIORITY LIST ISSUED BY THE RESPONDENT NO.2 IN YEAR OF 2023 MERIT WISE INSTEAD OF AGE WISE IN RESPECT OF PRIMARY SCHOOL TEACHERS (BPS-12) OF DISTRICT PESHAWAR WHICH IS VIOLATIVE OF THE PROVISO TO SECTION-4(2) OF THE APPOINTMENT AND REGULARIZATION ACT, 2017 AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS**

**PRAYER:**

That on acceptance of this service appeal the impugned seniority list which has been circulated by the respondents merit wise in the year 2023 may very kindly be declared as illegal, unlawful and ineffective upon the rights of appellant and the respondents may please be directed to prepare/issue a fresh seniority list as per Proviso to Section-4(2) of the Appointment and Regularization Act, 2017. Any other relief which this august court deems appropriate may also be granted in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

*Brief facts of the present appeal are as under:-*

- 1- That the appellant was appointed as Primary School Teacher (BPS-12) on 21.09.2016 through NTS. That right from the date of initial appointment the appellant is performing his duty at the concerned station quite efficiently and upto the entire satisfaction of his superiors. Copy of the appointment order is attached as annexure.....A.

2- That under the Khyber Pakhtunkhwa Employees of the Elementary & Secondary Education Department (Appointment and Regularization of Services) Act, 2017 the services of the appellant have been regularized. Copy of the Act is attached as annexure.....B.

3- That the criteria for determination of seniority inter-se of the employees regularized under the Khyber Pakhtunkhwa Employees of the Elementary & Secondary Education Department (Appointment and Regularization of Services) Act, 2017 has been provided in Sub Section 2 of Section-4 of the said act, which is reproduced as below:-

“Determination of seniority-----

- (1).....
- (2) The seniority inter-se of those employees, whose services are regularized under this Act within the cadre, shall be determined on the basis of their continuous service in Cadre:

“Provided that if the date of continuous service in the case of two or more employees is the same, the employee older in age shall rank senior to the younger one”.

4- That the respondent department issued the impugned seniority list dated 01.08.2023 on merit wise instead of age wise which is clear violation of the act ibid. Copy of the impugned seniority list is attached as annexure.....C.

5- That the appellant feeling aggrieved from the impugned seniority list preferred departmental appeal before the appellate authority but no reply has been received so far from the quarter concerned. Hence the appellant having no other remedy but to file the instant service appeal on the following grounds amongst the others. Copy of the departmental appeal is attached as annexure.....D.

**GROUND:**

A- That the impugned seniority list dated 01.08.2023 issued by the respondent No.2 is against the law, facts, norms of natural justice and materials on the record, hence not tenable and liable to be struck down.



B- That the appellant has not been treated by the respondent department in accordance with law and rules on the subject noted above and as such the respondents violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.

C- That the respondent Department acted in arbitrary and malafide manner while issuing the impugned seniority list dated 01.08.2023 on merit wise instead of age wise.

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- D- That as per Proviso of Section-4(2) of the appointment and regularization act, 2017 the respondent No.2 is duty bound to issue/circulate the seniority list of PSTs on age wise instead of merit wise.
- E- That the respondents failed to apply their independent minds in Proviso to Section-4(2) of the appointment and regularization act, 2017, which provides that if the date of appointment of two or more employees is the same, the employee older in age shall rank senior to the younger one but inspite of that the respondent department on the basis of malafide intention issued the seniority list dated 01.08.2023 on merit wise which illegal and unlawful.
- F- That the issue of seniority raised in the instant service appeal has already been decided by this august Tribunal in appeal No. 887/2020 title Jan Baz Khan Vs Education Department vide judgment dated 31.05.2023, therefore, the appeal in hand is liable to be decided on the same analogy.
- G- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that the appeal of appellant may very kindly be accepted as prayed for.

APPELLANT  
  
MUHAMMAD IMTIAZ ALI  
THROUGH:   
MAHMOOD JAN  
ADVOCATE

**CERTIFICATE:**

It is certified that no other earlier appeal was filed between the parties.

  
DEPONENT

**LIST OF BOOKS:**

- 1- CONSTITUTION OF PAKISTAN, 1973.
- 2- SERVICES LAWS BOOKS.
- 3- ANY OTHER CASE LAW AS PER NEED.

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**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

APPEAL NO. \_\_\_\_\_ /2024

**MUHAMMAD IMTAIZ ALI VS EDUCATION DEPTT:**

**AFFIDAVIT**

I **Mahmood Jan**, Advocate High Court, Peshawar on the instructions and on behalf of my client do hereby solemnly affirm and declare that the contents of this **service appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

  
**MAHMOOD JAN**  
Advocate  
High Court, Peshawar

"A"

5

**District Education Officer (Male) Peshawar**

PH No. 091-9331337, 9331336

Fax 091-9331337

E-mail [emis\\_peshawar@gmail.com](mailto:emis_peshawar@gmail.com)**APPOINTMENT.**

Consequent upon recommendation of the District Selection Committee, appointment of the following candidates is hereby ordered against the post of Primary School Teacher (PST) 2015 School based in BPS-12 (Rs.11140-800-35140) @ Rs. 11140/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge.

S#	Union Council Name	Name of Candidate	CNIC#	Total Score	Name of School	Remarks
1	Achini Bala	MUHAMMAD RAWAIL	17301-1267880-3	110.15	GPS Sangu Landi Bala	AGAINST VACANT POST
2	Akhunabad	TARIQ ALI	17301-8252582-7	116.6	GPS Haider Colony	AGAINST VACANT POST
3	Akhunabad	MUHAMMAD RIAZ	17301-8625231-1	112.71	GPS Akhooon Abad	AGAINST VACANT POST
4	Akhunabad	UMAR HAYAT	17301-3211081-7	100.51	GPS Akhooon Abad	AGAINST VACANT POST
5	Akhunabad	MUHAMMAD TAHIR	17301-1268983-9	97.12	GPS Akhooon Abad	AGAINST VACANT POST
6	Akhunabad	NASIR GUL	17103-0350180-9	90.09	GPS Haider Colony	AGAINST VACANT POST
7	Akhunabad	ABU BAKAR SIDDIQUE	17301-9396426-7	81.19	GPS Beri Bagh	AGAINST VACANT POST
8	Akhunabad	HASSAN ZAIB	17301-1602739-7	72.9	GPS Akhooon Abad	AGAINST VACANT POST
9	Akhunabad	ZUBAIR GUL	17101-0111368-3	69.27	GPS Haider Colony	AGAINST VACANT POST
10	Akhunabad	MUHAMMAD ISHAQ	17301-2011563-9	61.26	GPS Beri Bagh	AGAINST VACANT POST
11	Asia	SHAKEEL AHMAD	17301-2334603-5	93.61	GPS No.2 Asia Park	AGAINST VACANT POST
12	Asia	NADEEM BAIG	17301-3103612-5	86.29	GPS Jogan Shah	AGAINST VACANT POST
13	Asia	RIZWAN ULLAH	17301-3994302-7	83.47	GPS Asia Gate	AGAINST VACANT POST
14	Asia	SALMAN NAWAZ	17301-0186293-9	60.08	GPS Asia Gate	AGAINST VACANT POST
15	Aza Khel	AMIN ULLAH	17301-1085294-7	119.58	GPS Aza Khel No.1	AGAINST VACANT POST
16	Aza Khel	KHAIR ULLAH	17301-6372223-1	115.63	GPS No.2 Azakhel	AGAINST VACANT POST
17	Aza Khel	ABDUL ALI KHAN	17301-2761848-5	98.11	GPS Khandad Killi	AGAINST VACANT POST
18	Aza Khel	MUHAMMAD RAFIQUE	17301-7564675-3	94.45	GPS Sher Mir Killi	AGAINST VACANT POST
19	Aza Khel	SHABEER AHMAD	17301-8260045-5	83.45	GPS Tela Band No.1	AGAINST VACANT POST

M. Khan  
 ATTESTED

6

75	Deh Bahadur	SAHIBZADA MOHAMMAD NADEEM	17301-0977881-9	109.36	GPS Garhi Atta Muhammad	AGAINST VACANT POST
76	Deh Bahadur	ANAMULLAH	17301-4760630-7	94.46	GPS Gulshan Rehman Colony	AGAINST VACANT POST
77	Deh Bahadur	HASSAN KHAN	17301-1549927-9	89.72	GPS Gulshan Rehman Colony	AGAINST VACANT POST
78	Deh Bahadur	ASIL KHAN	17301-6008130-3	85.48	GPS Gulshan Rehman Colony	AGAINST VACANT POST
79	Deh Bahadur	MUHAMMAD IMTIAZ ALI	17301-0610889-3	85.42	GPS Gulshan Rehman Colony	AGAINST VACANT POST
80	Deh Bahadur	MUHAMMAD AAKIF ULLAH	17301-1294358-5	82.55	GPS Ghari Durrani	AGAINST VACANT POST
81	Deh Bahadur	TAIMUR KHAN	17301-8869549-3	80.82	GPS Gulshan Rehman Colony	AGAINST VACANT POST
82	Deh Bahadur	IHSAN ULLAH	17301-7922149-9	78.4	GPS Gulshan Rehman Colony	AGAINST VACANT POST
83	Deh Bahadur	SAFIR GUL	17301-1966230-1	76.1	GPS No.1 Deh Bahadur	AGAINST VACANT POST
84	Deh Bahadur	HUMAYUN KHAN	17301-1412875-7	74.4	GPS Garhi Atta Muhammad	AGAINST VACANT POST
85	GARHI SHER DAD	SYED MUHAMMAD MUSTAFA	17301-7824609-3	133.75	GPS Garhi Sherdad 1	AGAINST VACANT POST
86	GARHI SHER DAD	MUHAMMAD SULEMAN	17301-4136502-9	124.99	GPS Garhi Sherdad 2	AGAINST VACANT POST
87	GARHI SHER DAD	SHAKIL AHMAD	17301-2240763-7	122.5	GPS Garhi Sherdad 2	AGAINST VACANT POST
88	GARHI SHER DAD	MUHAMMAD ARSHAD KHAH	17301-1533858-7	112.8	GPS Yarghaji	AGAINST VACANT POST
89	Gul Bela	KHALID KHAN	17301-5159014-1	120.63	GPS Gul Bela	AGAINST VACANT POST
90	Gul Bela	ASAD JAN	17301-8832240-9	113.41	GPS Gulbela	AGAINST VACANT POST
91	Gul Bela	AFTAB ULLAH	17301-9802663-1	110.95	GPS Gulbela	AGAINST VACANT POST
92	Gul Bela	MUHAMMAD RASAN	17301-1506924-1	110.17	GPS Naguman	AGAINST VACANT POST
93	Gul Bela	WIQAS HUSSAIN	17301-6549764-3	100.75	GPS Naguman	AGAINST VACANT POST
94	Gul Bela	NAVEED KHAN	17301-4375948-5	98.4	GPS Naguman	AGAINST VACANT POST
95	Gul Bela	ASHFAQ AHMAD	17301-5081136-9	97.54	GPS Saeed Abad	AGAINST VACANT POST
96	Gul Bela	SAFI ULLAH	17301-0624620-3	96.89	GPS Gulbela	AGAINST VACANT POST
97	Gunj	IRFAN SIDDIQUI	17301-9153647-1	139.33	GPS Gunj Mandi	AGAINST VACANT POST
98	Haryana Payan	MUHAMMAD IBRAR	17301-1176783-5	121.97	GPS Haryana Payan	AGAINST VACANT POST
	Haryana	MUHAMMAD	17301-		GPS	AGAINST VACANT

M. J.

(7)

Disable Qoute

S#	Name	CNIC	Total Score	Name of school	Remarks
1.	SAJEED KHAN	17301-5273135-5	94.26	GPS NO.1 MERA BALARZAI	AGAINST VACANT POST
2.	NISHAD WALI KHAN	17301-1340736-1	92.34	GPS NO.3 MARYAMZAI	AGAINST VACANT POST
3.	IMTIAZ KHAN	17301-7288099-3	90.54	GPS KOCHIAN GULBELA	AGAINST VACANT POST
4.	MUHAMMAD IDREES	17301-6987802-1	88.18	GPS ZIARAT KOROONA	AGAINST VACANT POST
5.	SHARIF HUSSAIN	17301-5678693-9	87.45	GPS GARHI SHAHEEDAN	AGAINST VACANT POST
6.	SHAFAT ULLAH	17301-2013179-5	86.32	GPS ANEEZAI MASHO KHEL	AGAINST VACANT POST
7.	ZULFIQAR	17301-2590526-9	83.18	GPS KHAZANA PAYAN	AGAINST VACANT POST
8.	MUHAMMAD ABRAR	17301-8011636-1	82.97	GPS SHIEKH ABAD	AGAINST VACANT POST
9.	INAM ULLAH	17301-0703944-9	81.88	GPS NO.2 MUSAZAI	AGAINST VACANT POST
10.	FAZAL NABI	17301-3114979-7	80.42	GPS NO.1 FATU ABDUR RAHIMA	AGAINST VACANT POST

Minority Qoute

S#	Name of Candidate	CNIC#	Total Score	Name of School	Remarks
1	TAHIR ISHAQ	17301-4079710-1	48.54	GPS LAHORI GATE	AGAINST VACANT POST
2	ARTHUR GEORGE	17301-1486174-5	48.31	GPS NO.2 ASIA PARK	AGAINST VACANT POST

TERMS & CONDITIONS

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Their appointment is purely on temporary & contract basis initially for one year.
4. Their appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities by the SDEO (concerned). Candidate found producing fake/bogus/forged Certificates/Degrees will be reported to the law enforcing agencies for further action.
5. Pay will not be drawn until and unless a certificate to the effect by SDEO Male Peshawar is issued those thier certificates/Degrees, after comparing with the merit list, are verified.
6. Pay release order will be issued by this office after verification of all documents by the SDEO Male Peshawar.
7. Thier services are liable to termination on one month notice from either side. In case of resignation without notice thier one-month pay/allowances shall be forfeited to the Government.
8. They should join thier posts within one month 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 shall be entertained.

M-  
ATTESTED

... should be produced from the Medical Superintendent concerned


12. Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
13. Their appointment is made on School based, they will have to serve at the place of posting, and their services are not transferable to any other station.
14. Before handing over charge once again their documents may be checked if they have not the required qualifications they may not be handed over charge.

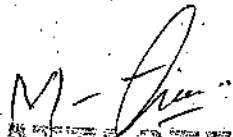
(Roz Wali Khan Khattak)  
District Education Officer  
Male Peshawar

Endst. No. 9364-764. Dated Peshawar the 21/8 /2016.

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
3. Deputy Commissioner Peshawar.
4. PS to District Nazim Peshawar.
5. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
6. PA to District Education Officer Male Peshawar
7. Sub Divisional Education Officer (Male) Peshawar
8. Head Teacher Concerned
9. Official Concerned.
10. M/File

  
Deputy District Education Officer  
Male Peshawar

  
ATTACHED



(9)

چارج رپورٹ

764-7364

21/9/2016

ایم محمد افسانہ، عملی پست آپ کا آرڈر

حکم DDEO صاحب GPS گلشن  
رحمن کالونی پوچھا گیا۔

لینڈا آج مورچہ 9/22 کو

بعد از دوپہر آپ کو اپنے نئے عیدے کا  
چارج دیا جاتا ہے

چارج کرینڈہ

چارج دینڈہ

HEAD MASTER  
Govt. PS School  
Gulshan-e-Rahman Colony  
Deshwar

M. J. Khan  
ATTACHED

Dist. Govt. KP-Provincial  
District Accounts Office Peshawar Dist.  
Monthly Salary Statement (August-2024)

10



Personal Information of Mr. MUHAMMAD IMTIAZ ALI d/w/s of SHAIKH SHAH WALI

Personnel Number: 00846181

CNIC: 1730106108893

NTN:

Date of Birth: 15.03.1992

Entry into Govt. Service: 21.09.2016

Length of Service: 07 Years 11 Months 012 Days

Employment Category: Vocational Temporary

Designation: PRIMARY SCHOOL TEACHER

80632270-DISTRICT GOVERNMENT KHYBE

DDO Code: PW6567-District Peshawar

Payroll Section: 003

GPF Section: 001

Cash Center:

GPF A/C No:

GPF Interest applied

GPF Balance:

232,314.00 (provisional)

Vendor Number: 30548902 - MUHAMMAD IMTIAZ ALI 009200000819005 BOK

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 12

Pay Stage: 7

Wage type		Amount	Wage type		Amount
0001	Basic Pay	29,780.00	1004	House Rent Allow 45% KP21	6,990.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
2316	Teaching Allowance 2021	2,664.00	2341	Dispr. Red All 15% 2022KP	2,718.00
2347	Adhoc Rel All 15% 22(PS17)	2,718.00	2378	Adhoc Relief All 2023 35%	9,922.00
2393	Adhoc Relief All 2024 25%	7,445.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3012	GPF Subscription	-3,300.00	3501	Benevolent Fund	-1,200.00
3534	R. Ben & Death Comp Fresh	-600.00	3609	Income Tax	-623.00
3990	Emp. Edu. Fund KPK	-135.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
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Deductions - Income Tax

Payable: 9,955.75 Recovered till AUG-2024: 1,246.00 Exempted: 2488.05 Recoverable: 6,221.70

Gross Pay (Rs.): 66,593.00 Deductions: (Rs.): -5,858.00 Net Pay: (Rs.): 60,735.00

Payee Name: MUHAMMAD IMTIAZ ALI

Account Number: 009200000819005

Bank Details: THE BANK OF KHYBER, 080092 Kohat Road Peshawar Kohat Road Peshawar, Peshawar

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: PESHAWAR

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: imtiaz3.ia@gmail.com

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**THE KHYBER PAKHTUNKHWA EMPLOYEES OF THE ELEMENTARY AND  
SECONDARY EDUCATION DEPARTMENT (APPOINTMENT AND  
REGULARIZATION OF SERVICES) ACT, 2017.**

**(KHYBER PAKHTUNKHWA ACT NO. I OF 2018)**

*(First published after having received the assent of the Governor of  
the Khyber Pakhtunkhwa in the Gazette of Khyber Pakhtunkhwa,  
(Extraordinary), dated the 8<sup>th</sup> January, 2018.)*

**AN  
ACT**

*to provide for the appointment and regularization of the services of certain employees  
appointed on adhoc or contract basis or appointed in certain projects in the Elementary  
and Secondary Education Department in  
the Province of the Khyber Pakhtunkhwa.*

**WHEREAS** it is expedient to provide for the appointment and regularization of the services  
of certain employees appointed on adhoc or contract basis or appointed in certain projects in  
the Elementary and Secondary Education Department in the Province of the Khyber  
Pakhtunkhwa, in the public interest;

It is hereby enacted as follows:

**1. Short title, application and commencement.—**(1) This Act may be called the Khyber  
Pakhtunkhwa Employees of the Elementary and Secondary Education Department  
(Appointment and Regularization of Services) Act, 2017.

(2) It shall apply to all the employees in the Elementary and Secondary Education  
Department, as defined in clause (c) of sub-section (1) of section 2 of this Act.

(3) It shall come into force at once and it shall be deemed to have taken effect  
from the date of the initial appointment of the employees as referred to in clause (c) of sub-  
clause (1) of section 2 of this Act.

**2. Definitions.—**(1) In this Act, unless the context otherwise requires,—

- (a) "Commission" means the Khyber Pakhtunkhwa Public Service Commission;
- (b) "contract appointment" means appointment of a duly qualified person for a specific period made otherwise than in accordance with the prescribed method of recruitment;
- (c) "employees" mean duly qualified persons.

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- (i) who are appointed as teachers on adhoc or contract basis by the Government after 2013 through National Testing Service but does not include the teachers engaged on work charge basis, or who are paid out of contingencies;
- (ii) who are appointed in the projects on contract basis in accordance with the project policy; and
- (iii) who are appointed as Junior Clerk in the Elementary and Secondary Education Department by Government after 2013 through National Testing Service;
- (d) "Government" means the Government of the Khyber Pakhtunkhwa;
- (e) "law or rule" means the law or rule for the time being in force governing the selection and appointment of civil servants;
- (f) "project" means,
  - (i) IT/Computer Teachers in Computer Labs Projects in Khyber Pakhtunkhwa (Phase-II);
  - (ii) establishment of five hundreds (500) IT Labs in Government High and Secondary Schools in Khyber Pakhtunkhwa; and
  - (iii) establishment of five hundreds (500) IT Labs in Government High Schools in Khyber Pakhtunkhwa (Phase-III); and
- (g) "teacher" means a teacher of primary, middle, secondary or higher secondary school.

(2) The expressions "adhoc appointment" shall have the same meaning as respectively assigned to them in the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973).

3. Regularization of services of employees.—(1) Notwithstanding anything contained in any other law or rules, the employees, who hold posts till the commencement of this Act [or till 30<sup>th</sup> June 2017, in respect of the project as mentioned in sub-clause (i) of clause (f) of sub-section (1) of section 2 of this Act, as the case may be], shall be deemed to have been validly appointed on regular basis from the day of the initial appointment, provided that—

- (i) they possess the same qualification and experience required for a regular post;

Inserted vide Khyber Pakhtunkhwa Act No. II of 2019.

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- (ii) they have not resigned from their services or terminated from services on account of misconduct, inefficiency or any other ground, before the commencement of this Act <sup>1</sup>[:]

<sup>2</sup>[Provided that expiry of the project as mentioned in sub-clause (i) of clause (f) of sub-section (1) of section 2 of this Act, shall not be deemed a ground for non-appointment of an employee on regular basis under this Act; and]

- (iii) the service promotion quota of all service cadres shall not be affected.

(2) The services of the employees shall be deemed to have been regularized only on the publication of their names in the official Gazette.

4. Determination of seniority.—(1) The employees whose service are regularized under this Act or in the process of attaining service at the commencement of this Act, shall rank junior to all other employees belonging to the same Cadre, who are in service on regular basis on the commencement of this Act, and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed to the Cadre, irrespective of their actual date of appointment.

(2) The seniority inter-se of those employees, whose services are regularized under this Act within the Cadre, shall be determined on the basis of their continuous service in Cadre:

Provided that if the date of continuous service in the case of two or more employees is the same, the employee older in age shall rank senior to the younger one.

5. Overriding effect.— Notwithstanding anything to the contrary contained in any other law or rules for the time being in force, the provisions of this Act shall have an overriding effect and the provisions of any such law or rules to the extent of inconsistency to this Act shall cease to have effect.

<sup>1</sup> Replaced vide Khyber Pakhtunkhwa Act No. II of 2019.

<sup>2</sup> Inserted vide Khyber Pakhtunkhwa Act No. II of 2019.

*M. S. Khan*  
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*M. S. Khan*

Office of the District Education Officer (Male) Peshawar

Final Seniority List of PST 2014 & 2015

S.No	Seniority No	Circle	School Name	Teacher Name	Father Name	Domicile	Academic Qualification													DOB	App: In Educs; Depart	D/O Regular Apptt:	DATE OF T/O/C/ ON PRESENT POST/ Peshawar	D/O/Passing PTC	DATE OF Consideration	Score	Remarks
							BPS	SSC	F.A/F.Sc	FA/SC/ B.A	Subjects in B.A/B.Sc	2nd	M.Sc	Subject in M.A/M.Sc	Other	PTC	CT	B.Ed	Others								
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	
1	1	Taluk Abad	GPS New Garhi Bathshi Pul	Salman Khan	Aman Ullah	Pesh	12	SSC	FA	BA	Arts	2nd	M.Sc	Economics		PTC			4/1/1989	4/1/1989	3/12/2018	9/1/2014	6/24/2013	9/1/2014	99.1	2014	
2	2	CPure	GPS Pakha Ghulam No.1	Irfan Yousof	Muhammad Yousof	Pesh	12	SSC	FA	BA	Arts	2ND	D	D		D	D	D	25/03/1987	01/09/2014	03/12/2018	09/01/2014	31/12/2010	01/09/2014	66.42	2014	
3	3	City	GPS Gusehar 2	Muhammad Arshad Khan	Haji Khan Muhammad	Pesh	12	SSC	FA	BA	Arts	1st				PTC	CT	ME	16/04/1983	01/09/2014	11/03/2018	01/09/2014	31/12/2010	01/09/2014	62.78	2014	
4	4	D-Zai	GPS Tauda No 2	Muhammad Ibrahim	Muham Shaky Ur Rahman	Pesh	12	SSC	F.Sc	B.Sc	Bio/Chem	1st	M.Sc	Botany		PTC		B.Ed	15/09/1988	07/10/2015	07/10/2015	07/10/2015	24/06/2013	07/10/2015	Court Case	2014	
5	5	B/Bar	GPS No.3 Talaband	Jan Nisar	Hashim Khan	Pesh	12	SSC	FA	BA	Arts	2nd	MA	Islamic st.		PTC		B.Ed	27/10/1988	22/02/2016	01/06/2020	07/03/2016	28/02/2012	07/03/2016	Court	2014	
6	6	Hazar Khwaja	GPS Sufimankhel	Ramdad Khan	Imdad Khan	Pesh	12	SSC	F.Sc	B.Sc	Maths, Physics	2nd	M.Sc	Maths		P.T.C			06/07/1989	21/09/2016	12/03/2018	22/09/2016	28/02/2012	22/09/2016	141.42	2014	
7	7	B/Bar	Gr: Dera Khan Korona	Fawadullah	Fida Muhammad	Pesh	12	SSC	DAE	BA	Arts	2nd	M.A	Islamic		P.T.C	X	X	14/05/1989	21/09/2016	12/03/2018	08/10/2016	28/02/2012	08/10/2016	134.59	2014	

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8	8	C/Pura	GPS Milan Gujar No.1	Muhammad Shahab	Zakir Ullah	Pesh	12	SSC	F.Sc	BA	Arts	2nd	MA	IR	P.T.C				04/09/1988	21/09/2016	12/03/2018	22/09/2016	28/02/2012	22/09/2016	134.02	2014
9	9	C/Pura	GPS Kukar	Muhammad Imran	Muhammad Khan	Pesh	12	SSC	D.Com	BBA (Honor)		1st	MBA/MS		P.T.C				04/06/1988	21/09/2016	12/03/2018	22/09/2016	14/03/2009	22/09/2016	133.71	2014
10	10	Mathra	GPS Patwar Bala	Wasil Ullah	Ihsan Ullah	Pesh	12	SSC	FA	BA	Arts	1st	MA	Politics I Sc	P.T.C				18/04/1982	21/09/2016	12/03/2018	22/09/2016	14/03/2009	22/09/2016	132.1	2014
11	11	Umar	GPS No5 Umar Miara	Muhammad Ibraheem	Khalil ur Rehman	Pesh	12	SSC	F.Sc	BA	Arts	2nd			P.T.C				05/08/1985	21/09/2016	12/03/2018	15/10/2016	28/02/2012	15/10/2016	131.81	2014
12	12	H-Abad	Govt Primary School Regi	Naveed Gul	Gharib Ullah	Pesh	12	SSC	F.A	BA	Arts	1st	M.A	Library Science	P.T.C				03/03/1983	21/09/2016	12/03/2018	14/09/2016	17/09/2010	24/09/2018	128.07	2014
13	13	Qry	GPS GUNU MANDI	Ajmal Shah	Faqir Shah	Pesh	12	SSC	FA	BA	Economic & statistics	1st	MSc	Economics	P.T.C				18/05/1984	21/09/2016	12/03/2018	23/09/2016	24/06/2013	23/09/2016	127.86	2014
14	14	Mathra	GPS Kala Kas	Muhammad Ajmal Khan	Sher Afzal	Pesh	12	SSC	F.Sc	BSC	Maths/Stats/Comp Sc	2nd	MSc	Statist/ Econo Polts	P.T.C				15/05/1982	21/09/2016	12/03/2018	22/09/2016	14/03/2009	22/09/2016	127.44	2014
15	15	Qant	GPS No.2 Nouthla Qadeem	Sajjad Ahmad	Sher Afzal	Pesh	12	SSC	F.Sc	BSC	Maths, Physics	2nd	M.Sc	Maths	P.T.C				03/05/1991	21/09/2016	12/03/2018	22/09/2016	24/08/2013	22/09/2016	126.33	2014
16	16	D-Zal	GPS Haryana Payan	Himayat Khan	Bakhtiar Khan	Pesh	12	SSC	D.Com	BBA Hons		1st			P.T.C				15/06/1991	21/09/2016	12/03/2018	22/09/2016	28/02/2012	22/09/2016	126.39	2014
17	17	D-Zal	GPS Khazana Sugar Mill	Muhammad Khan	Yousaf Khan	Pesh	12	SSC	F.Sc	BA	Arts	2nd			P.T.C				12/06/1990	21/09/2016	12/03/2018	22/09/2016	24/06/2013	22/09/2016	126.35	2014
18	18	B/Ber	GPS Muhammad Ali Kalbi	Fahad Ali	Ayub Khan	Pesh	12	SSC	F.Sc	BSC	Chem, Bio	2nd	M.Sc		P.T.C				28/02/1989	21/09/2016	12/03/2018	22/09/2016	24/06/2013	22/09/2016	125.9	2014
19	19	Hazar Khwazi	Gps no.4 Hazar Khwazi	Ali Afzal	Sher Afzal	Pesh	12	SSC	FA	BA	Urdu	2nd	MA	URDU	P.T.C				04/07/1986	21/09/2016	12/03/2018	22/09/2016	28/02/2012	22/09/2016	125.61	2014

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402	402	Cantt	GPS Gulshan Rahman Colony	Muhammad Imtiaz Ali	Shahid Shah Wali	Pesh	12	12	SSC	DAE	B.Sc	Maths/Physics	2nd	M.Sc	Economic	LIB	PTC			15-03-1992	21/09/2016	12-03-2018	01-07-2015	24-06-2013	22/09/2016	85.42	2015	
403	403	Mobira	GPS Garhi Fazl Haq	Umar Daraz Khan	Sabir Muhammad	Pesh	12	12	SSC	F.Sc	B.Sc	Economic/Stats	2nd	M.Sc	Economic	NI	PTC	X	X	01/01/1994	22/09/2016	12/03/2018	22/09/2016	30/11/2014	22/09/2016	85.34	2015	
404	404	C/Pura	GPS Chamkani No.2	Abid Hussain	Ajmal Hussain	Pesh	12	12	SSC	F.A	B.A	Arts	2nd	M.A			PTC	0	0	01/07/1989	22/09/2016	12/03/2018	22/09/2016	24/6/2013	22/09/2016	85.93	2015	
405	405	CANTT	GPS Garhi Sikandar Khan	Dauhat Khan	Sakir rehman	Pesh	12	12	SSC	F.Sc	B.A	Arts	2nd	M.A	Islamiyat		PTC	C.T	BLED	D.A.M	13/04/1987	22/09/2016	12/03/2018	22/09/2016	14/03/2009	22/09/2016	85.02	2015
406	406	C/Pura	GPS Garhi Baloch No.1	Ibrar Ahmed	Abdul Hakim	Pesh	12	12	SSC	F.A	B.A	Arts	2nd	M.A	Urdu		PTC	0	0	29/11/1989	23/09/2016	12/03/2018	23/09/2016	14/07/2015	23/09/2016	84.94	2015	
407	407	B/Rer	GPS No1 Badaber	Syed Asim Shah	Syed Noor Hussain	Pesh	12	12	SSC	F.Sc	B.Sc	(Maths Comp)	2nd	M.Sc			PTC		BLED		01/03/1988	22/09/2016	12/03/2018	22/09/2016	24/06/2013	22/09/2016	84.83	2015
408	408	B/Rer	GPS Nazimullah Korona	Abdul Basti	Faqir Muhammad	Pesh	12	12	SSC	F.A	B.A	Arts	2nd	M.A			PTC				02/06/1994	22/09/2016	12/03/2018	22/09/2016	12/01/2015	23/09/2016	84.79	2015
409	409	C/Pura	GPS Chamkani No.2	Shahid Ullah Khan	Sufaid Gul	Pesh	12	12	SSC	F.A	B.A	Arts	2nd	M.A			PTC	0	0	0	04/01/1989	22/09/2016	03/12/2018	22/09/2016	17/10/2010	22/09/2016	84.55	2015
410	410	B/Rer	GPS Mjar Kallay	Mohsin Khan	Gulshad	Pesh	12	12	SSC	F.A	B.A	Arts	2nd	M.A			PTC		BLED		10/04/1986	22/09/2016	12/03/2018	22/09/2016	17/09/2010	22/09/2016	84.25	2015
411	411	City	GPS Qazi Kallay	Israr Khan	Yousaf Khan	Pesh	12	12	SSC	F.A	B.A	Arts	2ND	M.A	MA Islamiyat		PTC	NI	BLED	MLED	12/04/1990	22/09/2016	12/03/2018	22/09/2016	24/06/2013	22/09/2016	84.01	2015
412	412	City	GPS Karampura	Muhammad Bilal	Muhammad basheer	Pesh	12	12	SSC	F.Sc	B.A	Law	1st	M.A	Politics science		PTC		BLED	MLED	6/23/1992	3/21/2017	3/12/2018	3/21/2017	1/12/2015	3/21/2017	83.22	2015
413	413	D-Zai	GPS Khazina payan	Zulfqar	Hayat Khan	Pesh	12	12	SSC	F.A	B.A	Arts	1st	M.A	Islamiyat		PTC				14/01/1988	22/09/2016	12/03/2018	22/09/2016	14/03/2009	22/09/2016	83.18	2015

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318	318	C/Pers	GPS Fatu abdur rehima No.1	Mohammad Alamgir Khan	Muhammad Imam	Pesh	12	SSC	FA	BA	Arts	2nd	MA	Urdu		PTC			02/08/1988	22/09/2016	03/12/2018	22/09/2016	17/09/2010	22/09/2016	92.27	2015
319	319	Tahsi Abad	GPS Palajzi	Ajmal Khan	Aurang zeb	Pesh	12	SSC	FA	BA	Arts	2nd	MA	Urdu		PTC	X	X	16/02/1985	22/09/2016	12/03/2018	22/09/2016	14/03/2009	22/09/2016	92.89	2015
320	320	Cantt	GPS NO.1 Pk payan	Shahjehan	Raza khsn	Peshawar	12	SSC	FA	BA	Arts	2nd	MA	Islamya		PTC			13/05/1980	22/09/2016	12/03/2018	22/09/2016	17/09/2010	22/09/2016	92.85	2015
321	321	W/ber	GPS No1 Mera Balarzal	Muhammad Ayez	Shermat khen	Pesh	12	SSC	FA	BA	Arts	2nd				PTC			15/03/1987	21.09.2016	12/03/2018	22.09.2016	24.06.2013	22/09/2016	92.8	2015
322	322	W/ber	GPS No.2 Mushbarzel	Khan Alam	Sher Azam	Pesh	12	SSC	FA	BA	Arts	2nd	MA			PTC			15/02/1986	21.09.2016	12/03/2018	21.09.2016	17.09.2010	22/09/2016	92.72	2015
323	323	Hazar khorral	Gps no 2 saurzal payan	Arif Allah	Roman khan	Pesh	12	SSC	DBA	B.A.	Arts	2nd	MA	Islam		PTC	CT	B.ED	7/25/1990	21-09-2016	3/12/2018	22-09-2016	28-02-2012	9/22/2016	92.72	2015
324	324	City	GPS dalazak colony	Amjad	Sikander Khan	Pesh	12	SSC	FSC	BA	Arts	3RD	MA	Politec. science		PTC	CT	B.ED	01/04/1982	21/09/2016	12/03/2018	22-09-2016	14/03/2009	22/09/2016	92.69	2015
325	325	Cantt	GPS Marozal No1	Ihsanullah	Ghulam Kussaln	Peshawar	12	SSC	F.sc	B.Sc	meths, phs	1st	MA	Islam		PTC	CT	B.ED	02/10/1990	21/09/2016	03/12/2018	22/09/2016	24/06/2013	22/09/2016	92.51	2015
326	326	D-Zai	GPS Khazana Bala	Saif Ur Rehman	Abdur Rehman	Pesh	12	SSC	FA	BA	Arts	3rd	MA			PTC			11/02/1982	22/09/2016	12/03/2018	22/09/2016	14/03/2009	22/09/2016	92.45	2015
327	327	Mattars	GPS Passani	Mishad Wali Khan	Zar Wali Khan	Pesh	12	SSC	FA	BA	Arts	2nd	MA	Pashto		PTC			03/01/1976	22/09/2016	12/03/2018	22/09/2016	14/03/2009	22/09/2016	92.34	2015
328	328	W/ber	GPS Fida Abad	Muhammad Shoalb	Nawab G.A	Pesh	12	SSC	FA	BA	Arts	2nd	MA			PTC			20/12/1979	21.09.2016	12/03/2018	22.09.2016	14.03.2009	22/09/2016	92.2	2015
329	329	W/ber	GPS Khayal A/ber Keh	Oaid Khan	Qasim Khan	Pesh	12	SSC	FA	BA	Arts	2nd	MA			PTC	CT		01/12/1979	21.09.2016	12/03/2018	22.09.2016	17.09.2010	22/09/2016	92.11	2015

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330	330	Hazar khwand	Gps Dora Gard gharib abad	Riaz Ullah	Nazeer Ullah	Pesh	12	12	SSC	FA	FA	BA	Arts	2nd	MA	0	0	0	0	0	0	30/04/1989	21-09-2016	12/03/2018	22-09-2016		22/09/2016	91.91	2015
331	331	Hazar khwand	Gps No.2 surtzal payan	Hussain Ahmad	Asdur Rashid	Pesh	12	12	SSC	FA	FA	BA	Arts	2nd	MA	0	0	0	0	0	0	01/03/1988	21-09-2016	12/03/2018	22/09/2016	28-02-2012	22/09/2016	91.83	2015
332	332	City	Zahid rbad	Shokat ali	Shah wali	Pesh	12	12	SSC	FA	FA	BA	Arts	2nd	MA	0	0	0	0	0	0	15/01/1984	22/09/2016	12/03/2018	22-09-2016	12/01/2015	22/09/2016	91.67	2015
333	333	Hazar khwand	Gps no 2 surtzal payan	Tariq Hussain	Hussain Khan	Pesh	12	12	SSC	FA	FA	BA	Arts	2nd	MA	0	0	0	0	0	0	07/08/1986	21-9-2016	12/03/2018	22/09/2016	14/03/2009	22/09/2016	91.67	2015
334	334	D-Zal	GPS Khazana Baba	Wajid Ali	Raj Wali Khan	Pesh	12	12	SSC	FA	FA	BA	Arts	2nd	MA	0	0	0	0	0	0	22/01/1991	22/09/2016	12/03/2018	22/09/2016	12/01/2015	22/09/2016	91.56	2015
335	335		GPS Youzaf Khel	Nisar Hussain	Guzar Hussain	Pesh	12	12	SSC	FA	FA	BA	Maths/C omputer	2nd	MA	0	0	0	0	0	0	2/5/1992	9/11/2016	9/12/2018	9/26/2016		9/26/2016	91.47	2015
336	336	C/Pura	GPS Fetu abdur rahima No.1	Mohammad Kallm Ullah	Sibghat ullah Jan	Pesh	12	12	SSC	FA	FA	BA	Maths/C omputer	2nd	MBA	0	0	0	0	0	0	30/8/1988	23/9/2016	03/12/2018	25/9/2016	22/07/2010	23/09/2016	91.31	2015
337	337	H-Abad	GPS No 4 Hayatabad	AMJAD SHAH	NOOR JAMAL	Pesh	12	12	SSC	FA	FA	BA	Arts	2nd	MA	0	0	0	0	0	0	08/03/1984	21/9/2016	12/03/2018	29/9/2016	17/9/2010	29/09/2016	91.26	2015
338	338	C/Pura	GPS Fetu Abd ur Rahima No.1	Muhammad Amir Sohail	Muhammad Ismail	Pesh	12	12	SSC	FA	FA	BA	Arts	2nd	MA	0	0	0	0	0	0	31/3/1993	22/9/2016	03/12/2018	22/9/2016	28/1/2012	22/09/2016	91.14	2015
339	339	B/ber	GPS No2 Dhal Dhar	Irfan Ullah	Adal Sher	Pesh	12	12	SSC	FA	FA	BA	Arts	2nd	MA	0	0	0	0	0	0	18/01/1985	21.09.2016	12/03/2018	24.09.2016	14.03.2009	24/09/2016	91.04	2015
340	340	D-Zal	GPS Khazana payan	Muhammad Asif	Khair Ul Aman	Pesh	12	12	SSC	FA	FA	BA	Arts	2nd	MA	0	0	0	0	0	0	03/09/1980	22/09/2016	12/03/2018	22/09/2016	04/03/2009	22/09/2016	91.03	2015
341	341	B/ber	GPS Muhammad Sher Khil	shuktar Khan	straj	Pesh	12	12	SSC	FA	FA	BA	Arts	2nd	MA	0	0	0	0	0	0	15/03/1991	21.09.2016	12/03/2018	22.09.2016	24.06.2015	22/09/2016	90.81	2015

Handwritten signature/initials.

M-*[Signature]*

To

(D)<sup>4</sup> (19)  
The Director,  
Elementary & Secondary Education Department,  
Khyber Pakhtunkhwa, Peshawar.

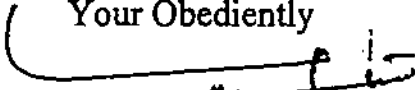
Subject:- DEPARTMENTAL APPEAL AGAINST THE IMPUGNED SENIORITY LIST ISSUED BY DEO (MALE) DATED 01.08.2023

Respected Sir,

It is humbly requested that the District Education Officer (Male) Primary Peshawar issued Seniority list of PSTs BPS-12 on 1/08/2023 on the basis of NTS Marks rather than age wise which is the clear violation of Section-4 Sub Section-2 of Appointment & Regularization Act, 2017, therefore, your good self is humbly requested that the same may kindly be declare as illegal and the concerned office May kindly be Directed to prepare the Seniority list on the basis of age wise for the teacher appointed on the Same date.

Dated: 18.06.2024.

Your Obediently

  
MUHAMMAD IMTIAZ ALI, PST (BPS-12),  
GPS Gulshan Rehman Colony, Peshawar

  
ATTACHED

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

\_\_\_\_\_ OF 2024

Muhammad Inliq Ali

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

VERSUS

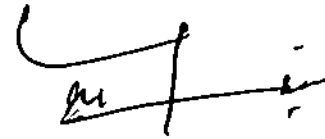
Education Deptt.

(RESPONDENT)  
(DEFENDANT)

I/we Muhammad Inliq Ali

Do hereby appoint and constitute **MEHMOOD JAN, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. \_\_\_\_ / \_\_\_\_ / 2024



CLIENT



ACCEPTED

**MEHMOOD JAN**  
**ADVOCATE**

OFFICE:

Room No.6-E, 5<sup>th</sup> Floor,  
Rahim Medical Centre, G.T Road,  
Hashtnagri, Peshawar.