BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1461/2024

Jamil Muhammad khan

٧s

Govt of Khyber Pakhtunkhwa & others

INDEX

S No	Description	Annexure	Page
1	Comments		01-03
2 .	Affidavit		04
3	Amended appointment order	A	05-10
4	Health certificate	В	11
5	Advertisement	С	12

Respondent

DISTRICT EDUCATION OFFICER

(MALE) CHARSADDA



BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1461/2024

Jamil Muhammad khan

 $\cdot \cdot V_S$

Govt of Khyber Pakhtunkhwa & others

Kbyber Pakhtukhwa Service Tribunal

Diary No. 17522

Dated 01-11-24

Written comments on behalf of Respondents

Preliminary Objections:

Respectfully Sheweth:

- A. That the Appellant has no locus standi and cause of action.
- B. That the present Appeal is wrong, baseless and not maintainable, it shows no cause to be taken for adjudication, therefore, the Appeal is liable to be rejected/dismissed.
- C. That the Appeal is unjustifiable, baseless, false, frivolous and vexatious.

 Hence the same is liable to be dismissed with the order of special compensatory costs in favour of Respondents.
- D. That no legal right of the appellant has been violated, therefore, the appellant has no right to file the instant appeal.
- E. That the Appellant is completely estopped/precluded by his own conduct to file this Appeal.
- G. That the Appellant has not come to this Hon' able Tribunal with clean hands. The Appeal also suffers from misstatements and concealment of facts and as such the Appellant is not entitled to equitable relief.
- H. That the Appellant has no right to file the instant Appeal and the Hon' able Services Tribunal has got no jurisdiction to adjudicate upon and the Appeal is liable to be dismissed.
- I. That the instant appeal is barred by law and limitation.



PARA WISE REPLY ON FACTS:

- 1. That the Para is subject to cogent evidence.
- 2. That though initially the appellant was appointed on 31/05/2014, but the appointment order of the appellant and his colleagues was amended and in this regard a corrigendum was issued. The amended order directed the appellant and many of his colleagues to take their charge from 01/09/2014, because of long summer vacations to save the public exchequer. (Copy of corrigendum order is attached as annexure A)
- 3. That the appellant had been directed in the amended appointment order to take charge of his duties from 01/09/2014, therefore, his service too were regularized from 01/09/2014 and amendment in appointment order is absolutely according to the conditions at serial No 9 in advertisement. That perusal of the appointment order, condition at serial No. 9 clearly shows that the appellant should take charge of his duties after the production of medical/health certificate, meaning thereby, that no one could take charge before producing his health certificate. The appellant health certificate shows, that it was issued on 02/06/2014, then how it is possible that the appellant took charge on 31/05/2014. Moreover the judgment dated 06/11/2023 passed in service appeal No. 7597/2021 is sub silentio on the point of submitting Health and age certificate on 02.6.2014 and, therefore, the instant issue is not similar to that already decided by this Honorable Tribunal. (Copy of health certificate is attached as annexure B)
- 4. That the answering respondent issued a corrigendum order which directed not only the appellant but also all the appointees of the said appointment order i-e total 144 primary school teachers the only cause against that very corrigendum was to save the huge amount of salaries because of three months of long summer vacations. The only purpose of corrigendum was to save the public exchequer of a huge amount of nearly 144 primary teachers' in shape of salary which amounts nearly to RS. 35 Million to 36 Million. Moreover the judgment dated 06/11/2023 passed in service appeal No. 7597/2021 is sub silentio on the point of submitting Health and age certificate on 02.6.2014 and, therefore, the instant issue is not similar to that already decided by this Honorable Tribunal.
- 5. Pertains to record. It is worth mentioning that the pay slip of the appellant shows that the appellant enter into service on dated 01/9/2014 (Copy of Pay slip is attached as annexure C)
- 6. That the appointment order of the appellant had been amended due to long three months summer vacations which usually start from 1st June and terminates on 31st august therefore, had been directed to take charge after summer vacations i.e on dated 01/09/2014, hence in the perspective of amended appointment order is not entitled for any kind of relief. It is a famous maxim and judgments of the Hon 'able superior courts that when there is no duty there is no pay. Appellant regularized from 01/9/2014 hence not entitled for any kind of benefits from 31/05/2024.



GROUNDS

- A. That the answering Respondents acted in accordance with law, because the appellant medical certificate shows that it was issued on 02/06/2014, therefore, how can the appellant took charge on 31/05/2014, therefore, the sole ground is enough for dismissal of appeal.
- B. That the Para as stated is incorrect, the answering Respondents are law observing officials and always respected the law and rules.
- C. That Para as stated is incorrect because the term and condition No.9 of the appointment order fulfilled on 02/06/2014, then how the appellant can take charge of his duties on the same day, further the appellant has served less than 180 days on 1st December 2014, therefore, is not entitled for annual increment.
- D. Incorrect, the appellant is not entitled for the increments and other benefits, because of the amended appointment order.
- E. That the Para as stated is irrelevant to the present circumstances of the appeal hence, can't be replied, however, as the amended appointment order and the appellant medical certificate clearly indicates that the appellant has not taken over charge on 31/05/2014, hence, is not entitled for any kind of benefits.
- F.G. That the Para has already been replied in the above paras on facts.
 - H. That the Answering Respondents seek permission of this Hon 'able Tribunal to submit other grounds at the time of heaving of the instant appeal.

1. (Samina Altaf)

__DIRECTOR

AUTHORIZED OFFICER
ABDUS SAMAD

DEPUTY DIRECTOR

E&SE Department Khyber Pakhtunkhwa Peshawar.

(Muhammad Sheraz)

2. THE DEO (MALE) Charsadda

4

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1461/2024

Jamil Muhammad khan

Vs

Govt of Khyber Pakhtunkhwa & others

<u>AFIDAVIT</u>

I Mr. Muhammad Sheraz DEO (M) Charsadda do hereby solemnly affirms that the information provided by the DEO (M) and the contents of the Parawise comments submitted by respondents are true and correct and nothing has been concealed intentionally from this Hon' able tribunal. Further stated on oath the answering respondent have neither been placed an ex-parte nor have struck of/cost.

Deponent

(Muhammad Sheraz)

DISTRICT EDUCATION OFFICER

(MALE) CHARSADDA

4/A



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) CHARSADDA









091-9220481

deom.ca@kpese.gov.pk facebook.com/Deomcharsadda

AUTHORITY LETTER

I. Muhammad Sheraz District Education Officer (Male) Charsadda do hereby authorized Mr. Wisal Muhammad Khan Legal Representative on behalf of District Education Officer (Male) Charsadda, to deal with the issues regarding litigation, represent, submit Comments/Reply of the Service Appeals and attend the KPK Honorable Service Tribunal Peshawar.

(Muhammad Sheraz)

DISTRICT EDUCATIN OFFICER
MALE CHARSADDA



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION

NOTIFICATION

I. Samina Altaf. Director Elementary & Secondary Education Department Khyber Peshawar do hereby authorize. Mr. Abdus Sammad. Deputy Director (Legal) Directorate of Elementary & Secondary Education to sign parawise comments, replies, implementation report, objection petitions, civil miscellaneous application etc on my behalf for onward submission before the courts of law/tribunals as the case may be, with immediate effect in the interest of public service.

DEPARTMENT KHYBER PAKHTUNKHWA PESHAWAR

DIRECTOR

Elementary& Secondary Education Khyber Pakhtunkhwa Peshawar

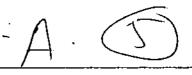
Endst. No. 2633-43 /F.No. AD(Lit-II)/E&SED/Office Correspondence/Vol-II/2024 Dated Peshawar the 26/07/2024.

Copy of the above is forwarded for information & n/action to the:

- . Chief Secretary Khyber Pakhtunkhwa.
- 2. Advocate General Khyber Pakhtunkhwa,
- 3. Secretary Law Department Khyber Pakhtunkhwa.
- 4. Learned Registrar High Court Peshawar (with one each spare copy for the Honorable Judges).
- Learned Registrar Khyber Pakhtunkhwa Service Tribunal Peshawar (with one each spare copy for the Honorable Chairman/Members).
- 6. All Section Officers E&SE Department Khyber Pakhtunkhwa, Peshawar,
- 7. All District Education Officer (Male/Female) Khyber Pakhtunkhwa.
- 8. PS to Secretary E&SE Department Khyber Pakhtunkhwa, Peshawar.
- 9. PA to Additional Secretary (General) E&SE Khyber Pakhtunkhwa, Peshawar,
- 10. PA to Director E&SE Department Khyber Pakhtunkhwa. Peshawar.
- 11. Master File.

Elementary& Secondary Education
Khyber Pakhtunkhwa Peshawar

ATTESTED





1

To be substituted with No and Date Appointment Order PST Ad hoc Basis

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) CHARSADDA

APPOINTMENT

Consequent upon recommendation of the District Selection Committee, appointment of the following candidates are hereby ordered against the post of PST School based/UC based in BPS-12 (Rs: 7000-500-22000) @Rs: 7000/= fixed plus usual allowances as admissible under the rules on ad hoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from 01-09-2014.

PST BPS-12

_	Name	School Name	U/C	Score
	MUHAMMAD KHALID 17102-6537002-5	GPS Station Killi	Abazai	
<u>2</u>	MARJAN ALI 17101-9766071-5	GPS Sheikh Killi	Agra	132.89
3 _/	MIAN ADIL SHAH 17101-6844013-5	GPS Agra Bala	Agra	121.21
1/1	MUHAMMAD AMIN 17101-9188159-3	GPS Agra Balu	 -	116.33
5 _{1/}	TILAWAT SHAH 17101-0113694-5	GPS Mandizai	Ayra	114.58
5/	MUILAMMAD SHOAIB 17101-0315588-7	GPS Ashra	Battagram	133.59
 '/	SHAH ANWAR 17101-0399895-3		Battayram	129.66
-	MUHAMMAD ASIM 17101-7492491-7	GPS Marozai	Battagram	124.24
	SHAH KHALID 17301-4432180-5	GPS Mathra New	Battagram	121.45
 •/	NASIR KHAN 17101-0307693-1	GPSKhisro Khan Killi	Battagram	119.30
ر ار	MUHAMMAD ISHTIAQ 17101-3765891-7		Behiola	135-48
<u>-</u>	YASEEN KHAN	GPS Mian Shakh No.6	Behlola	132.34
_	17101-2716399-9 NIZAM ULLAH	GPS Salar Killi	Behlola	132.18
<u>'</u>	17101-6378689-5 MUHAMMAD ALI	GPS Islam Abad Dargai	Dargai	135.83
_	17101-0300786-9 1KRAM UL HAQ	GPS Nahaqi-1	Daulat Pura	118.45
_	17101-6170115-7	GPS Ambadher-1	Daulat Pura	
<u> </u>	ASIF ULIAH 17101-0826588-1	GPS Daulat Pura	Daulat Pura	116.29
7/	UMAR GUL 17101-6375764-1	GPS Aziz Abad-2		114.31
8	ABDURAHMAN 17101-0342715-1	GPS Jan Abad	Dheri Zardad	121.66
9/	DAWOOD MASOOD 17101-0328797-7	GPS Kalyas	Dheri Zurdad	114:33
<u>~</u>	ZAFAR ALI 17101-0260821-7		Dheri Zardad	104.56
*	MURAMMAD GULZAR 17101-2239656-1	GPS Dozehra-3	Doschra	116.17
2	SIKANDAR SHAH 17101-2156902-9	GPS Haryana-2	Dusehra	111.12
3	JAWAD MUHAMMAD	GPS Check Nissatta	Dosehra	118.55
	17101-1671324-1	GPS Shah Dhand	Dosehra	117.17

TESTED



To be substituted with No and Date * Appointment Order PST Ad hoc Basis

				" land"
2,1	KHIZAR HAYAT 17102-7968271-1	GPS Gundheri Payon No.1	Gandherl	137.0
25	AIUHAAIMAD PERVEZ 17102-6620616-9	GPS Gundheri Vala	Gandherl	133-58
26	ZAIIID NIUILANIALAD 17102-9586608-9	GPS Gandheri Payan No.2	Candherl	128.93
27	SHAKEEL AHMAD 17102-7470051-9	GPS Karimo Handa	Condharl	123.06
28	WAYAR KIIAN 17101-5363178-3	GPS Malka Dher	Ghuilia Karkana	#16.56 V
29	KAMIRAN ULLAII 17101-0319290-9	GPS Malka Dher	Ghunda Karkana	115.09
30	SHAMS UL HAQ 17101-1857398-9	GPS Baz Mian Killi	Ghunda Karkana	105.70
31	REHMANULIAH 17103-0354096-1	GPS Ocha Wala-s	Haji Zal	122.25
32	ALI GAUHAR 17103-0371185-7	GPS Mahmood Abad	Haji Zai	117.8 .
33	ANN'AR ZEB 17102-3704269-7	GPS Inzar Killi	Harichand	124-50
34	JAIVADALI 17101-1922862-5	GPS Khubai	Hassan Zal	128.94
35	AIUILANIALAD IZILAR / 17101-3845983-7	GPS Hawan Zal	Hassan Zal	(23.63
36	NASEEM KILAN 17101-0393647-3	GPS Sokhla-s	Hasson Zal	181.51
37.	ARNIIAD KIIAN 17101-8362252-7	GPS Kotak	Hassan Zal	115-33
3#	MEHROZ KHAN 17102-05(17988-3	GPS Gal Abod Tonyi	Hisura Nehrl	143.57
39	ASAD ALI 17102-2121297-9	GPS Gul Abad Tangl	Hisara Nehri	135.72
40	SIIAIIID KIIAN 17102-2870858-1	GPS NIS Gul Qilla	Hisura Nehrl	129-44
41	SHER ALI 17101-8836640-3	GPS Kangra	Kangra	131.62
42	NOOR ULLAII JAN 17101-0167274-9	GPS Ghurambak	Kungra	124.02
43	FATIIUL AMIN 17101-9343851-3	GPS D.Sikandar Khan	Kungra	116.54
44	SIIAD NIUILAMMAD 17101-7588487-J	GPS Haryana	Kanyra	115.98
45	NAEEM JAN 17101-9764384-5	GPS Haryana	Kanyra	115.19
46	ABDUR RAFI JAN 17101-6321182-5	GPS Sadar Garhi-3	- Katozai	99-35
47	SYED ZAHEER ABBAS 17101-0960254-5	GPS Spinkai-s	Katozal	96-43
48	BAKIIT TAJ GUL 17101-2528410- 5	GPS Dherai Kor	Kalozal	102.51
49	ZIA RAFIQ 17101-0377826-3	GPS Katozul-1	Katozal	120.86
50	NUILAMMAD AWAIS 17101-4275472-1	GPS Katozal-2	Kutozuł	112.95
51	SHER BAZ KHAN 17:01-9:68708-7	GPS Spinkal-2	Katozal	105.58
52	ZULFIQAR ALI 17101-0310390-9	GMPS Champana	Khan Mahl	128.51
53	RIAZ AJINIAD 17102-9703868-5	* GPS Landi Roud	Koz Behrum Dherl	132.39
			•———	

attested



To be substituted with No and Date Appointment Order PST Ad hoc Basis

5.	AMROOZ KIIAN	GPS Landi Roud	Was #24	1
\vdash	17102-2051249-1		Koz Behrum Dheri	122.07
5.5	17102-7714899-5	GPS Arat Killi	Koz Behram Dherl	119.64
σ¢	MUKJITAR ULLAII 17102-1163877-1	GPS Islamabad Deobandl	Koz Behram Dheri	119.22
57	NAZIR AHMAD 17102-6036836-7	GPS Mardhand No.1	Koz Behram Dherl	112-46
50	17103-U3.18097-5	GPS M. Rustum Khel	M.M Khal	131.51
59	ABUUS SALANI 17301-3407039-1	GPS Matta Mughal Khel	M.M Khel	124.18
60	SAEED KIIAN 17101-7276529-5	GPS Matta Mughal Khel	M.M Khel	114.32
6;	WISAL AHMAD 17101-4418397-3	GPS Husson Cul Kor	NI.NI Khel	106.07
62	RAILANI SIIID KIIAN 17101-9461238-9	GPS Krapa Muhammad Khan	M.M Khel	105.96
63	SYED ZIAUDDIN BADSIIAH 17101-0275214-9	GP\$ Daryab Kor	MM Khel	104.98
64	YASIR KIIAN 17102-2872837-3	GPS Mandani	Mandani	118द्
65	MUILAMMLAD TAYYEB 17102-7302181-1	GPS Tangl No.1		133.24
66	NUIMNINAD ISMAIL SIMHID 17102-0407188-7	GPS Tangl No.3	. MC Tangl	1#3.96
67	MUHANIMAD DAWOOD KHAN 17102-7433487-7	GPS Tangl No.1	MCTangl	118-34
GS	KIIALIL ULIAII - 17101-0401414-5	GPS Ulmanzai-3	MC Ulmanzal	124.07
69	ROOH UL ANIN 17101-0365780-5	GPS Dag Shamozai	AIC Utmanzal	11331
70	FARHAD ALI 17101-3558119-9	GPS Kaligon	MC Utmanzai	108.25
71	AIUILAAIALAD YAR 17101-0310807-3	GPS Charsadda-3	MC-s Charsadda	130.01
72	NUILANAMAD ADIL JAN 17101-9006856-5	GPS Bosa Khel-2	MC-s Charradda	104.12
73	MOAZANI JAN 17101-8006111-9	GPS Qazi Khel-a	NIC-1 Charsadda	122.53
74	BAKIT MUNIR 17101-0397973-1	GPS Sadiq Abad	MC-s Shabqadar	125.67
75	IRFAN ULIAII 17301-4722563-9	GPS Rahmatullah Khan Kor	MC-1 Shabqadar	1184
76	MAJID SHAH 17101-8067215-1	GPS Rahmatullah Khan Kor	MC-s Shabqadar	109.49
77	TNAMI UL IIASSAN 17101-1254810-1	GPS Tambuluk	MC-2 Charsadda	121.71
78	MUHAMMAD ZEESHAN 17101-9729175-5	GPS Khat Killi	MC-2 Charsadda	115.17
79	RASOOL \$11A11 17101-4723173-3	GPS Prang-1	NIC-z Charsádda '	114.8
đơ.	ASFANDIVAR 17101:3975974-3	GPS Pennyeg	MC-a Charsadda	109.01
81	ZAFAR KILAN 17101-716\$544-7	GPS Skabgadar Fort-2	NIC-2 Shabqadar	99.7
8.0	DILAWAR SHAH 17101-4419772-5	GNIPS Bubra	MC-3 Chd	114.04
a,	TARIQ JAN 17101-1602078-9	GPS Anakl-3	MC·3 Shabqadar	96.94
84	JIISAN ALI 17103-0368397-7	GPS Attaki-3	MC-3 Shabqadar	94.47
1		<u> </u>	<u></u>	





To be substituted with No and Date. Appointment Order PST Ad hoc Basis

			•	٠.
1	ADNAN ILUSSAIN 17301-094948A-7	GPS Gonda	MC-3 Shabqadar	122.0
6	14 NIOHHH ULLAH 17101-0108796-9	GPS Attaki-2	MC-3 Shabqadar	100.96
· 8	7 SAYYED NIASOOD AJINIAD / 17101-2505470-1	GPS Attakl-2	MC-3 Shabqadar	100.85
	NIAZALI 17101-1124090 3	GPS Attakt g	AH* 3 Shaliqudae	tine,u=
8	9 USAIAN ALI 17101-5122374-1	GPS Asmat Abad	AIC d Charsaddo	116.6
90	BISAN ULLAH ALIAS ASAD 17101-038875-3	GPS Umar Abad	MC-4 Chursadda	115:34
91	NUSRATALI 17101-0253339-3	GPS IslamAbad-2	MC-4 Charsadda	101.79
92	WAJID ULIATI 17101-0413010-5	GP\$ Fugir Abad	Meru Prany	143.47
93	FAZALAMIN 17101-0958822-3	GPS Sheikh 81 auf killi	Alera Umarzal	125.38
94	BIUILANNLAD INIKAN 17101-9521339-3	GPS Ewaz Killi	Mera Umarzai	124.57
. 95	ALAMIZEB KILAN 17101-3836322-3	GPS Nawab Khan Koro	ilera Umarzai -	117-94
98	ASIF SHAII 17101-8062079-9	GPS Shalmano Killi	Mera Umarzai	116.10
97	SILAIIID ALI 17102-9561338-5	GPS Dildar Garld	Mirsa Dher	120-48
: 98	ISIITIAQ AIIMAD 17102-5847695-7	GPS Allan Sahib Garhi	Mirsa Dher	113.93
99	YASIR KIIAN 17101-0203548-5	GPS Inam Killi	Muhammad Nari	125.6
100	QAISAR ALI 17101-7317747-3	GPS Muhammad Nari	Muhammad Nari	118.45
101	511/1111D KII/AN 21407-5793986-5	GPS Shah Afzal Abad	Muhammad Nari	118.25
103	W/AJID ULLAII 17101-0357508-5	GPS Ghandail Khan Kor	Nissatta	132.78
103	SHEHER GILAYAS KHAN 17101-7071293-3	GPS Purao-t	Nissatta	130-3
104	NIANIAT ULLAII 17101-2435986-3	.GPS Mion lea	Panjpao	141.53
105	ROKIIAN ALI 17101-9080500-9	· GPS Dalazak	Pingpaa	133.56
106	ZUBAIR KIIAN 17103-0342333-9	GPS Shahbaz Khan Kor	Parijpao	125.45
107	MIRZA ALI KIIAN 17103-0340645-5	GPS Pir Qilla No.1	Panjpao	122.66
108	SILAJI NIUILANNAD 21407-4142405-3	GPS Yarjan Killi	Panjpao	114.36
109	AKIITER ALI 17101-0257749-1	GPS Angur Kor	Kajjar-s	144.92
(11)	ABDUL MUSAWIR 17101-3401857-5	GPS Angar Kor	Raijar-1	132.1
""	OWAIS ULIAII 17101-7180368-1	GPS Sulai Kamar	Rajjar-s	118-43
(18	SILAJI AYAZ UDDIN 17:101-027:844-3	GFS Raijar-1	Rajjar-s	102.35
ìı,	TAHIR ALI SHAII 17101-8707068-5	GPS Shakar Dhand	Raijar-s	118.74
114	ATTA ULLAII JAN 17102-0983778-5	GPS.Rahima	Rajjar-s	117.28
115	MANZOOR ALI 17101-1819839-7	GPS Gujrano Klill	Raijar-z	109.71
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To be substituted with No and Date Appointment Order PST Ad hoc Basis

. >	x .	1	1	1
/110	MUHAMMAD BASIR 17101-1420852-7	GPS Wardaya-1	Rajjar-s	107.59
117	SADEEQ ULLAH 17101-6320758-7	GPS Kadai-2	Rashakal	96.2
118	NIUSTAFA ZEB	GPS Rashakal	Hunhakul	99.99
119	17:01-4604514-5 ABDULLAH KHAN 17:01-6417232-9	GPS Zrawar Khan Kor	Roshakal	#7.29
120	CHIL HAJ KHAN 17101-1385140-3	GPS Handa Kashakai	<u> Kashakal</u>	118.53
121	7AKIR ULLAII 21407-5670864-5	GPS Banda Kashakai	Rashakal	117.43
128 	AIUHAMMANNSAJJAD 17101-1895884-3	GPS Chundul Kor	Rashaka i	114.17
. tau	KHAN MUHAMMAD 17101-1059CH2	CPS Mian Rilli	Hashakal	107.21
124	KARAM ILAHI 17101-0321468-5	GPS Ajoon Killi	Sarki Titara	127.52
125	ISITIYAQ AIIMIAD 17101-2752491-J	GMPS Hayat Gul Kor	Sarki Titara	124.92
126	FANAD AIINIAD 17101-0303540-3	GPS Julol Killi-2	Sarki Titara	118.25
127	IRSHAD ALI 17101-0993454-5	GPS Amour Killi-s	Sarki Titara	120.41
188	ZAIN III. ARIDEEN 17101-4689553-3	GPS Sarki Titara-1	Sarki Mara .	112.05
129	JANIL MUHAMMAD KHAN 17101-0377280-9	GPS Haqdar Qalarai	Sarki Titura	111.20
130	MUSTAFA 17102-9575090-9	: GPS Chall	Shodag	134.38
131	HAROON KHAN 17101-3800476-1	GPS D. Ghulam Qadir	Tarnab	130.34
	SIIAIIAII ALI 17101-0874659-3	GPS D. Mukarram Khan	Tarnab	110.7
	MUDA\$\$IR \$IIA!! 17101-3398831-9	GMPS Tankhuzai	Tirmyzal	126.55
	WAQAR ALI SHAH 17101-7684422-5	GPS Anwar Mahal-2	Turanyzal	121.33
	Z DI ULL AH 17101-7128195-1	GPS Anwar Mahal-2	Turangzal	112.97
	MUHAMMAD YASIR 17101-8371336-5	GPS Eidgah	Umarzai	121,89
	WASIQ JAN 17101-6328961-3	GPS Umarzai-2	Umarzal	118.65
TO 1	VAEEM JAN 17101-0332021-1	GPS Yakh Kohi	Umarzai	115.59
	ATTAULLAII NOOR 7101-5067018-7	GPS Zahoor Abad	. Umarzal	113.3
2 <i>U</i> I	UFTAB AIIAIA D 7101-9526663-5	GPS Chitla Dherni	Vinarza	109.25
81 S	ABER SILAII 7102-8126097-7	GPS Zuhrab Gul	Ziam	130.56
	IUIIAMMAD TUFAIL 7102-6314292-7	GPS Hamaish Gul Killi	Ziam	129.4
	OSIIAN KIIAN 7102-1224859-5	GPS All Jan Killl	Ziam	122.65
	OUSAF KIIAN 7/02-9866008-5	GPS Hisara Ajlana	Zlam	118.35

ATTESTED



To be substituted with No and Date Appointment Order PST Ad hoc Basis

TERMS & CONDITIONS.

- 1. NO TA/DA etc is allowed.
- Charge reports should be submitted to all concerned in duplicate.
- 3. Appointment is purely on temporary & contract basis initially for one year.
- 4. They should not be handed over charge if they exceed 35 years or below 18 years of age.
- 5. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO (concerned). Anyone found producing boyus. Certificate will be reported to the law enforcing agencies for further action.
- 6. His services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
- 7. Pay will not be drawn until and unless a certificate to the effect by DEO(concerned) is issued that his certificates are verified
- 8. He should join his post within 10 days of the issuance of this notification. In case of failure to join their post within 10 days of the issuance of this notification, his appointment will expire automatically and no subsequent appeal etc shall be entertained..
- 9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
- 10. Before landing over charge he will sign an agreement with the department, otherwise this order will not be valid.
- 11. Ife will be governed by such rules and regulations as may be issued from time to time by the Gost.
- 12. His services shall be terminated at any time, in case his performance is found unsatisfactory during his contract period. In case of misconduct, he shall be preceded under the rules framed from time to time.
- 13. His appointment is made on School based, He will have to serve at the place of posting, and his service is not transferable to any other station.
- 14. Before handing over charge once again their document may be checked if they have not the required qualification, they may not be handed over charge.

(Siraj Muhammad) District Education Officer (Male) Charsadda

Endst: No:4807-4958/Dated: Charsadda the 31/05/2014

Copy forwarded for information and necessary action to the: -

- 1. Director E&SE Deptt: Khyber Pakhtunkhwa Peshawar.
- 2. Deputy Commissioner Charsadda
- 3. District Accounts Officer Charsadda
- 4. SDEO (M) Charsadda
- 5. SDEO (M) Tangi
- 6. Official Concerned
- 7. M/File

District Education Officer

(Male) Charsadda

ATT.STED

MEDICAL CERTIFICATE

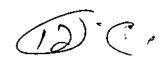
Name of Official Months Mamil Mohamman & Alam
Caste or race
Father's Name
Residence Dajont Rosoma Turangani
District Charlanda
Date of birth 01-10-1978
Exact height by measurement 51-6
Personal mark of identification / (17/0/- 032)286-9
Signature of the Official
Signature of head of office
Seal of Office
I do hereby certify that I have examined Mr Jamil Noham
a candidate for employment in the office of the follows 10 n 1801. Chaf
and can not discover that he had any discase communicable or other constitutional
affection or bodily infirmity except
I do not consider this as disqualification for employment in the office of the
. His age according to his own statement is
years and by appearance about the cal years.

LEFT HAND THUMB AND FINGER

IMPRESSIONS_



Medical Superincadan antal Charge In DHQ Hospital Charsadda



عر المعول و علاما الم يكن على جارس ك دير الكام موال على منسع وفي كذول خال آ ماجون إلى إلى سكول وسل (Adhac School Based الروي ك ليمن بارسد يكم فن ال المهدان ف عجول الروي مورد 20 مزرك 101 وعدر فراسم الملوب من ر فاست قارم این لائن NTB کا دعب سائف (MIta://www.nis.org.plu) پر متواب ہے۔ پادر ہے کے کمل اور متر رد تاریخ کور سال کے بعد میصول الدوالدو فواستون يفروس كابانكاء لعلى 10 بليت 5448 لبره لااے ، لِاالم مل إسادى الليد كم كم تعليم شده بي ورثى سے بعدى لي مرفع كيد يا مالدايس ايد وكري 35t18 مال النام يمثر كم ي حليم شده في فورق عدال الفار الفار) الماؤ في سان المركش **BPS.15** لاا نے لاالی کا کی می تشکیم شد و ندو ت برما کی سالہ وانک اسر کورس میکید الزائع 35118 مال BPS-15 لیائے بی الیم می اسادی کا بلید کی می تشایم شوہ می نیودگ سے بعدا یک مالہ جونیز ڈیڈ سان لیزیکل اسکو کمٹن טיטט كوس إا ول عدادك ريكك إد كرسادك البيت BPS-15 ا 35t الحال الحى اليم كا (ميكند دويون) كمي مي تسليم شده إدارات بعد شهادة العالب لي الموم العربية الما ما مركم مستند تعليم يو المل الوقال المدادى إ وارسوم ميدو فريد مواسة وارسوم بإر إن مواسة واراضوم جرال وارا طوم دروق جرال إ BPS-IS ال-15120 مال ك كى كىلىم ئد دى تدى سے مولى عى ميكن كاس اسر داكرى الي الحي ك (ميكن أورون) من مح تسليم شده إدا مع معد شهادة العاليد كى منظور شدة تنظيم الوفاق العدادى إ 5 أرأ دار المعلوم ميدو شريف مواحة وارمطوم بإرباح مواحدة والمالموم يترال والمعلوم وروش يترال إسكندؤو بران المراب BPS-15 35120 مال اسلام المستح ك كليم شور في ندو كا ب 6 700 اعرمید بد بعد منظ الحرآ ن ادرمند آت کی کامنخورشد وادارے سے BPS-12 35t 18 مال ا تومیذیت إمساد ک مرفیکید می می تسلیم شده بود است بعد به امری مول تجرم فیمیکیت او بی سان ایم کیشن کمی لالحمالي متعداداد سے الی الی الی الی (مینفردون) کی معودشد ، بروز سے بعد 2 سالدالیوی اید و کری ان BP5-12 35118 مال الجيئن كي كل المراد ويونون _ كشن كريشيوفا: (Selection Criteria)

اسا نذہ کے سکیٹن کریٹر یاددین فوٹ فی <u>(Selection Criteria)</u> اسا نذہ کے سکیٹن کریٹر یاددین فوٹ میں ہے کہ 200 فبرات کی تعمیم میں فردائے ہے کہ جانگی۔ ایسٹر پنگ ٹیسٹ پر دیے NTS – 100 فبر

سية مكالآلمة عمال فري الإستان المستان	7, 100
ب على تالبت = 100 فمرجم كام ياتسيم من مرة بوك	تعليمى فابليت
ـــــــــــــــــــــــــــــــــــــ	الحرايرى
ماسل كرده بر 20. تعسيم كل نبر	الغدار الغيداليمري
ماس كرده كبر 20x مليكي كبر	ل المال
مامل کرد قبر ×20 کنیرکو ز	ا کا سے الکمالی ک
مامل کرد انبر ۱5x تشیری فر	براً ساى كيليمللوب بشدمانية بيد ١١٨٠٠
ما كرد فر الحرار المراكز فر	الجايران الماسيم يمن
ب مال كوه نم روي مسيمك نر	उउद्यापार्या
	The second second

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