

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

C M No: _____/2024

Service Appeal No. 1755/2024

Khyber Pakhtunkhwa
Service Tribunal
Diary No. 17989
Dated 14-11-24

Lazim Khan

Vs

Director of other

**APPLICATION FOR PLACING ON FILE THE
ADDITIONAL DOCUMENTS**

Respectfully Sheweth:

1. That the titled service Appeal is pending adjudication before this Honorable Service Tribunal is fixed for 22-11-2024.
2. That the appellant seeks permission to place on file the
 - i. Final seniority list dated 31-08-2024.
 - ii. Representation dated 24-09-2024.

It is therefore most humbly prayed that on acceptance of the instant application the documents attached may kindly be considered as part & parcel of the titled appeal.

Dated 14/11/2024


Appellant

Through


Muhammad Saeed Khattak

Advocate Peshawar

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DIR UPPER
FINAL SENIORITY OF (2024) DRAWING MASTER (DM) BPS-15 (M) Dir Upper, AS STOOD ON 31-08-2024

1	2	3	4	5	6	7	8	9	10	11	12
S.No	Name of Teacher	Father's Name	D-O Birth	Designation	Name of School	Ac Qualif:	Prof: Qualif:	Divisi on	D-O 1st Apptt: In Edu Dept	D-O regular Apptt: as DM B-15	Remarks
1	Sher Zamin	Sher Zada	14/03/1972	DM B-15	GMS Sundal	FA	DM	2nd	05/04/1999	05/04/1999	
2	Samullah	Ahmad	01/03/1980	DM B-15	GMS CHAPPAR	MA	DM, B.ED	2nd	13/04/2005	13/04/2005	
3	Sahib Zada	Lal Mohammad	02/03/1980	DM B-15	GMS DASKORE	BA	DM	2nd	13/04/2005	13/04/2005	
4	Bakht Zada	Mohd Zamin	03/12/1980	DM B-15	GMS KOTKAY	MA	DM/M.Ed	2nd	13/04/2005	13/04/2005	
5	Sirajud Din	Mian Jan	03/07/1982	DM B-15	GMS Nasir Abad	MA	DM/B.Ed	2nd	13/04/2005	13/04/2005	
6	Wahidullah	Mohd Afzal	10/02/1983	DM B-15	GMS GAMDAT	MA	DM, B.Ed	2nd	13/04/2005	13/04/2005	
7	Saifur Rahman	Badshah Rahim	11/04/1983	DM B-15	GMS Kaligam	MA	DM, B.Ed	2nd	13/04/2005	13/04/2005	
8	MISBAH UR RAHMAN	MUHAMMAD RAHMAN	07/01/1971	DM B-15	GMS BANDAN	MA	M.ED/DM		20/06/2013	03/02/2009	Seniority Consider as per court judgment declared on 22-10-2013 RPNo 7-M/2012 in W.P 3620-2010 & Review P.No.8/2012 in W.P-4378/2010 vide DEO order No.5694-99 dated 16-12-2013, his seniority will be consider w.e.f 03-02-2009
9	MUHAMMAD ANWAR	SAR ZAMIN KHAN	04/11/1975	DM B-15	GHS KARKABANI	MA	DM		20/06/2013	03/02/2009	Seniority consider as per above court judgment
10	TAJ MUHAMMAD KHAN	DARWAISH KHAN	16/02/1977	DM B-15	GMS TARPATAR	BA	DM		20/06/2013	03/02/2009	Seniority consider as per above court judgment
11	GUL BADSHAH	KHAISTA BACHA	04/04/1981	DM B-15	GHS ACHAR BALA	MA	DM		20/06/2013	03/02/2009	Seniority consider as per above court judgment
12	MUHAMMAD IQBAL	FAZAL HADI	01/03/1984	DM B-15	GHS MOLVI	MSC PAK STUDIES	DM		20/06/2013	03/02/2009	Seniority consider as per above court judgment
13	QADEEM KHAN	AFZAL KHAN	15/6/1983	DM B-15	GMS GURRAI	BA	DM		12/01/2013	03/02/2009	Seniority consider as per above court judgment
14	SARDAR ALI	AMBALI JAN	10/02/1985	DM B-15	GHSS PACHAKALAY	MA	DM		04/05/2017	03/02/2009	Seniority consider as per above court judgment
15	Burhanud Din	Abas Khan	28/04/1983	DM B-15	GMS Shawoor	BA	DM	2nd	12/01/2006	01/03/2009	
16	Muhammad Tayeb	Ahmad Rahim	01/01/1987	DM B-15	GMS Sundal	MA	DM, B.Ed, M	2nd	12/01/2006	01/03/2009	
17	Alam Zeb Ali Shah	Mian Mohd Rafiq	04/03/1982	DM B-15	GMS Shamogar	MA	DM	2nd	12/04/2006	01/03/2009	
18	Ashfaq Ahmed	Fida Muhammad	20/04/1985	DM B-15	GMS Kass Chindakot	MA	DM/M.Ed	1st	01/12/2006	01/03/2009	
19	Shahabud Din	Amir Hasham Khan	13/02/1987	DM B-15	GMS SHALGHA	MA	DM/M.Ed	2nd	20/11/2008	01/03/2009	
20	Bakht Wali Khan	Badrud Din	03/02/1981	DM B-15	GMS Almas	BA	DM	2nd	01/03/2009	01/03/2009	
21	Inamur Rahman	Sultan Mohammad	04/08/1981	DM B-15	GHS Bela	MA	DM	2nd	01/03/2009	01/03/2009	
22	Imran Khan	Mohd Yousof	06/09/1982	DM B-15	GMS Bandagai	BA	DM	2nd	01/03/2009	01/03/2009	
23	Mohammad Dost	Ali Stan	04/12/1984	DM B-15	GMS Sunnai	BA	DM	2nd	01/03/2009	01/03/2009	
24	Fazal Subhan	Inayt Ullah	21/05/1985	DM B-15	GMS Badalai	BA	DM	2nd	01/03/2009	01/03/2009	
25	Inayatul Haq	Mohd Amin	04/07/1985	DM B-15	GMS Tarpatar	MA	DM	2nd	01/03/2009	01/03/2009	
26	Rahmanullah	Fazal Raziq	17/02/1986	DM B-15	GMS Kasai Karpat	BA	DM	2nd	01/03/2009	01/03/2009	
27	Saifur Rahman	Wajid Rahman	02/01/1987	DM B-15	GMS Bandan	BA	DM	2nd	01/03/2009	01/03/2009	
28	Azadullah	Saeedullah	25/04/1987	DM B-15	GHS Shahikot	BA	DM	2nd	01/03/2009	01/03/2009	
29	Aziz Ahmed	Sher Mohammad	25/04/1987	DM B-15	GMS Barkand	MA	DM, B.Ed, M	2nd	01/03/2009	01/03/2009	

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30	Sanullah	Sajid Rahmat	06/06/1988	DM B-15	GMS Hattan	MA	DM	2nd	01/03/2009	01/03/2009	
31	ISLAM UDDIN	NOOR ALI KHAN	02/02/1980	DM B-15	GMS SALAMKOT	BA	DM, BED		14-12-2012	14-12-2012	
32	LAZIM KHAN	MIAN GUL ZARIN	01/02/1974	DM B-15	GHSS USHARI	BA	B.ED/DM	2nd	20/06/2013	20/06/2013	
33	FAZAL MANAN	BAKHT SHER KHAN	01/01/1987	DM B-15	GMS KANDAW JABBAR	MA	DM/B.ED		12/01/2006	26/03/2013	
34	SHER ALI	BAKHT MUHAMMAD	09/02/1986	DM B-15	GHS MALANGA	BA	DM		20/11/2008	26/03/2013	
35	SAEED ULLAH	SAZBAR KHAN	17/03/1986	DM B-15	GMS DAM JABBAR	BA	DM		08/01/2011	26/03/2013	
36	ANWAR SAID	SAR ZAMIN	01/12/1976	DM B-15	GMS SHERAT KAL	BA	DM		26/03/2013	26/03/2013	
37	MATI ULLAH	SHAH NASIB KHAN	04/02/1985	DM B-15	GMS ROGHANO KALY	BA	DM		26/03/2013	26/03/2013	
38	TASLEEM ULLAH	IBADUL HAQ	20/03/1986	DM B-15	GHS Shahkot	MA	BED		26/03/2013	26/03/2013	
39	AURANG ZEB	MUHAMMAD HAZIR	03/07/1982	DM B-15	GMS NARKOON	MA	DM/B.ED		03/09/2010	05/03/2016	
40	SHAH KHALID	MUSLIHUD DIN	05/05/1986	DM B-15	GMS SHAHOOR	MA	DM/B.ED		05/05/2014	05/05/2014	
41	MUHAMMAD IRFAN ULLAH	MUHAMMAD ZAHIR SHAH	04/09/1985	DM B-15	GMS Chirgalai	BA	PTC		20/11/2008	05/03/2016	
42	IRSHAD KHAN	KHYBER KHAN	01/10/1990	DM B-15	GMS LAMOTAI	MA	DM		07/03/2016	05/03/2016	
43	HAZRAT UMAR	SARDAR ALI	04/11/1991	DM B-15	GMS SHOT KASS	MSC	DM		07/03/2016	05/03/2016	
44	MUHAMMAD ULLAH	MIAN SAIFUL MALOOK	03/03/1978	DM B-15	GMS REHANKOT	MA	DM, BED		05/03/2016	05/03/2016	
45	Syed Wiqarud Din	Muhammad Rafiq	08/10/1989	DM B-15	GHS Janbharu	MA	DM		05/03/2016	05/03/2016	
46	FAZAL GHANI	MUHAMMAD ZAMIN	15/12/1984	DM B-15	GMS NASRAT	MA	DM		03/06/2016	05/03/2016	
47	INIYATUR RAHMAN	HABIBUR RAHMAN	03/12/1991	DM B-15	GMS HAYAGAY	MA	DM		03/06/2016	05/03/2016	
48	QIAMUDDIN	SULTAN SALIM	01/04/1986	DM B-15	GHSS SHERINGAL	MA	DM		26/03/2016	26/03/2016	
49	SYED HAZ ULLAH	ALI ULLAH	02/06/1991	DM B-15	GHS BELA	MA	DM		28/03/2016	05/03/2016	
50	SYED ARSHAD ULLAH	ALI ULLAH	02/06/1991	DM B-15	GMS Jarjori	MA	DM		28/03/2016	05/03/2016	
51	MUHAMMAD ZUBAIR	SYED JUMAIR	03/05/1989	DM B-15	GMS SUNNAI	MA	DM		11/04/2017	11/04/2017	
52	Mushiq Ahmad	Muhammad Ayub	01/01/1994	DM B-15	GHS GANSHALL	MA	DM		01/03/2015	11/04/2017	
53	MUHAMMAD IBRAHIM	MUZAFAR KHAN	02/05/1982	DM B-15	GMS SIALTALO	MA	DM/B.ED		23/09/2006	11/04/2017	
54	IMRAN ULLAH	AZIZ UR RAHMAN	01/12/1989	DM B-15	GMS BELANZAI	MA	DM		08/04/2014	11/04/2017	
55	NAWAB ZADA	GHULAM SADIQ	15/05/1982	DM B-15	GMS KALKOT	MA	DM		11/04/2017	11/04/2017	
56	SYED SAHIBULLAH	AHSANULLAH	01/05/1991	DM B-15	GMS SERATAI	MA	DM		11/04/2017	11/04/2017	
57	ZAKIR ULLAH	SADBAR KHAN	06/05/1995	DM B-15	GHS DOON BALA	BA	DM/PTC		11/04/2017	11/04/2017	
58	ZAHOR ALAM	MUMTAZ KHAN	02/01/1976	DM B-15	GMS BEKARI	MA	DM, BED		01/04/2018	01/04/2018	Sacke employees
59	NAWAB ZADA	KHAN ZADA	06/04/1979	DM B-15	GHS MINA DOAG	MA	DM		13/09/2018	13/09/2018	Court Case
60	UMAR BADSHAH	LAL BADSHAH	01/02/1980	DM B-15	GMS Mota	BA	DM		13/09/2018	13/09/2018	Court Case
61	GUL AMIN	SAHAB ZAR KHAN	15/03/1985	DM B-15	GMS SHEYAL	MA	DM		15/07/2020	15/07/2020	Court Case
62	KALIM ULLAH	MUHAMMAD AMIN KHAN	20/05/1980	DM B-15	GMS NURKON	BA	DM		24/12/2022	24/12/2022	Court Case
63	AMIR USMAN	SAID USMAN	07/02/1992	DM B-15	GHS KASKAJ KARPAT	BS Sociology			09/05/2020	09/05/2020	
64	SANAULLAH	BURHAN UDDIN	01/05/1994	DM B-15	GMS SIASAN	BBA			09/05/2020	09/05/2020	appointed in other dept:
65	ASAD ULLAH	MUHAMMAD ZAMIN KHA	13/03/1997	DM B-15	GMS ROGHANOKALAY	BS Zoology			26/06/2021	26/06/2021	
66	MUHAMMAD ULFAT ULLAH	MUHAMMAD RAZZAQ	30/11/1991	DM B-15	GHSS BARAWAL BAND	B. T&C			28/07/2022	28/07/2022	
67	IKRAMUL HAQ	HAZRAT AHMAD	01/09/1994	DM B-15	GHS BELA	BS Zoology			28/07/2022	28/07/2022	
68	MOHSIN ULLAH	SAID MUHAMMAD	14/05/1996	DM B-15	GMS BALKORE	Pharma D			28/07/2022	28/07/2022	

C.T.R.

To

The Director Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

**REPRESENTATION ON BEHALF OF LAZIM KHAN DRAWING
MASTER BPS-15 GHSS USHERAI DISTRICT DIR UPPER
(APPELLANT) AGAINST THE IMPUGNED ACTION OF DEO (MALE)
DIR UPPER FOR PALACING HIM AT S. NO. 32 INSTEAD OF S. NO.
9 IN THE FINAL SENIORITY LIST DATED 31-08-2021.**


Respectfully Sheweth:

1. That the appellant along with 08 others was initially appointed as Drawing Master (BPS-09) vide order dated 16-12-2013 in light of the judgment delivered by the Hon'ble Peshawar High Court Peshawar they were granter seniority from 03-02-2009 .
2. That the seniority list was issued, wherein, the appellant was placed at S.No 15.
3. That thereafter tentative seniority list dated 13-08-2024 was issued wherein, the appellant was dropped to S No 32 while the Candidate at S No 16 was brought to S. No. 9 similar is/ was the position of some others.
4. That being highly aggrieved of the same the appellant filed an objection application before the D.E.O (Male) Dir Upper Which was turned down vide order dated 21-08-2024 for the reason that court has made specific decision for them.
5. That the appellant and those who have been Shown Senior to him in the very final seniority list are equally entitled for the benefit of court's decision if any the impugned action of the authority is discriminative and is based on malafide.

It is therefore requested that the appellant may kindly be placed at his Position at Serial No. 9 in the seniority list issued on 31/08/2024.

Dated: 24/09/2024

Appellant
Lazim Khan
(DM) GHSS Usheri district Dir Upper


24/9/2024