

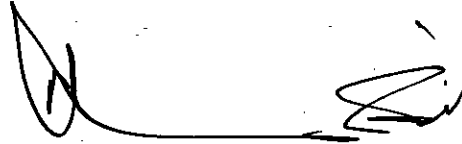
S.A 7425/2021

25th March, 2022

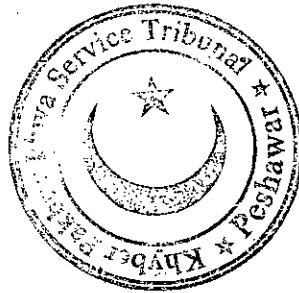
Learned counsel for the appellant present and requested for withdrawal of the appeal on the ground that the appellant wants to approach proper forum. His signature has been obtained on the margin of order sheet as a token of admission of his submission.

2. This appeal is, therefore, dismissed as withdrawn in view of request of the appellant. The appellant may approach proper forum, if so advised, permitted under the law. Consign:

3. Pronounced in open court in Peshawar and given under my hand and seal of the Tribunal this 25th day of March, 2022.




(KALIM ARSHAD KHAN)
Chairman



25.01.2022

Clerk of counsel for the ~~appellant~~ present.

Former requests for adjournment due to general strike of the bar. Adjourned. To come up for reply/preliminary hearing on 24.03.2022 before S.B.


(Mian Muhammad)
Member(E)

24.03.2022

Appellant alongwith counsel present.

Learned counsel for the appellant seeks adjournment in order to prepare the brief. Adjourned. To come up for preliminary hearing on 25.03.2022 before S.B.


Chairman


Form-A
FORM OF ORDERSHEET

Court of _____
Case No. 7425/2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	20/09/2021	As per direction of the Worthy Chairman this case may be entered in the Institution Register and put to the S. Bench for preliminary hearing on <u>15/11/21</u> .
	15.11.2021	<p style="text-align: right;">REGISTRAR</p> <p>Nemo for the appellant.</p> <p>Notice be issued to the appellant as well as his counsel for preliminary hearing before the S.B on 25.01.2022.</p> <p style="text-align: right;">(MIAN MUHAMMAD) MEMBER (E)</p>


Sir,

1. This appeal was returned to the counsel for the appellant to remove the objections/deficiency, five of them were met out while the remaining objection no. 2 & 3 were not removed. Learned counsel requests to place the case before the bench.
2. Submitted for orders please


Registrar ^{ew} 16/9/2021

3. Worthy Chairman

Keeping the objections intact,
place the case before bench.


16/9/2021

The appeal of Mr. Sharifullah son of Hafiz r/o Manyari UC Gokand Tehsil daggar District Buner received today i.e. on 10.06.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Copy of impugned rejection order of departmental appeal mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.
- 3- Copy of new appointment order mentioned in para-6 of the memo of appeal is not attached with the appeal which may be placed on it. Order dated 4.12.2020 is recommendation for appointment but not appointment order.
- 4- The authority to whom the departmental appeal was made/preferred has not been arrayed a necessary party.
- 5- Appeal has not been flagged/annexed with annexures marks.
- 6- Annexures of the appeal may be attested.
- 7- Certificate be given to the effect that appellant has not filed any service appeal earlier on the subject matter in this form.

No. 963 /S.T,

Dt. 10/6 /2021

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Alim-ur-Rehman Adv.
High Court Buner.

- Siv. The objection no (2) have been tried to be removed but the authority to whom the application was made they are reluctant to grant the comments/order copy. in this regard the application for grant of copy is attached.
- 1
 - 2
 - 3
- Secondly the objection no (3) mentioned above have also been tried to removed but the departmental high ups insisted that we have issued the stated recommendation order only and we have relied upon that only and there is no specific order have been issued and drafted in consequence thereto Dtd - 4-12-20 is only one other objections as directed and pen pointed removed accordingly.

Please be put off before the court for further proceeding.

22-6-21
ALIM-UR-REHMAN
Advocate High Court,
A. D. 0000

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. _____/2021

Sharif Ullah S/o Hafiz Gul R/o Manyari UC Gokand, Tehsil

Daggar, District Buner.....Appellant

VERSUS

Govt. of KPK and others..... Respondents

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S. #	Description of Documents	Annexures	Pages
1.	Service Appeal		1-7
2	Affidavit		8
3	Addresses of the Parties		9
5	The copy of appointment order No. 08 dated 20/08/2009	"A"	10
6	Copy of termination notice no. 5354 dated 31/05/2013 and new appointment dated 04/12/2020 and copy of departmental appeal along with receipt AD 11/03/2021.	"B"	11-16
7	Wakalat Nama		17

8) Application for impleadment


(18)

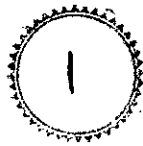
9) Certificate.

Appellant

(19)

Through Counsel


Alim Ur Rehman
Advocate, High Court



BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. 7425 /2021

Diary No. 6005

Dated 10/6/2021

Sharif Ullah S/o Hafiz Gul R/o Manyari UC Gokand, Tehsil

Daggar, District Buner

.....Appellant

VERSUS

- 1) Govt. of Khyber Pakhtunkhwa through Chief Secretary at Peshawar
- 2) Conservator Forest Khyber Pakhtunkhwa Malakand Division
- 3) Divisional Forest Officer Buner

.....Respondents

Filed to-day
by
Registrar
10/6/2021

Service Appeal Under Section 4 of Service Tribunal Act read with other relevant provisions against the impugned order, whereby the application of the appellant dated 11/03/2021 for regularization in a forestation project Buner District Buner has been rejected illegally, unlawfully and unconstitutional.

ATTESTED
& Accepted

Registrar
Khyber Pakhtunkhwa
Service Tribunal
Daggar

PRAYER:

On acceptance of this service appeal the impugned order may kindly be declared illegal, unlawful and unconstitutional, and the appellant may kindly be allowed to be regularize and any other benefits which this Honorable Tribunal may deems fit in the given circumstances of the case, may kindly be granted in favor of petitioner.


Any other relief, deemed fit in the given circumstances of the case may also be awarded in favor of appellant against respondents.

Respectfully Sheweth:

The appellant submits as under:

1. That the above named appellant has served the department as Forest guard BPS-5 under the auspices of respondents namely "Aforestation Project in Buner District".

(The copy of appointment order No. 08

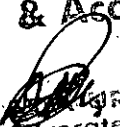
ATTACHED
 & **FILED**

RAHMAN
 Advocate, High Court,
 At Daggar

dated 20/08/2009 is attached herewith as annexure "A")

2. That the appellant has served afforestation scheme vigilantly sincerely in also in befitting manner being capable of the mentioned skill and profession and has not showed any slackness or failing on the part of appellant and remained will conversant and done all whatever required by the Department without any reluctance and resistance.

3. That vide Notice No. 7354 dated 31/05/2013 issued by the DFO Buner has been recalled the recruitment order having no legal force in the eye of law because along with the present of appellant the other employees namely Mr. Liaq Ali, Mr. Zia Uddin, Mr. Imran have been sustained intacted and remained as it is on the above appointing order and they have not de-appointed and

**ATTESTED
& Accepted**


MR. BAHMAN
Advocate High Court,
At Daggar

have not served with the same notice and have illegal and discriminately maintain them despite the fact that all postings was based on contract scheme then why they have not served along with the appellant and have not deal them with the same mode and manner and hence committed illegally and irregularity which is amenable to scrutiny and be decided on parity basis.

4. That the appellant have been discriminately dealed in the prevailing attending circumstances and the appellant is of hopeful to be adjusted and promoted along with back benefits warranted under the prevailing laws and regulations as the appellant have already served in the office of respondents by rendering five years services without an fault on the part of appellant keeping in view the requirement and experience in the field and also his

ATTESTED
& Accepted


M. RAHMAN
Advocate High Court,
At Daggar

eligibility in the circumstances of the matter in hand.

5. That all the above mentioned forest guards have regularized in the same order the appellant have been discriminated without any plausible and legal footing hence need to be regularized and may kindly be adjusted on permanent base to meet the ends of justice hence prayed accordingly.

6. That in the year 2009, the department appointed the appellant for one year and further they have extended the post for the period of three years up to 2013 and thereafter, they have served the appellant the termination notice dated 31/05/2013 and time and again they have reappoint the appellant on 04/12/2020 as a skilled labour aforestation project billion tree and still serving on the post, so therefore, this Honorable Court may kindly be please to

ATTESTED
& Accepted



ABDUL RAHMAN
Advocate High Court,
At Daggur



consider on parity base the regularization process of the appellant in the shape of future prospect, capability and having the skill in the stated field and in the best interest of justice. (Copy of termination notice no. 5354 dated 31/05/2013 and copy of new appointment dated 04/12/2020 and copy of departmental appeal along with receipt AD 11/03/2021 is attached herewith as annexure "B")

7. That this appeal is being filed against the recent order passed by the respondents, hence this Honorable Tribunal has got the jurisdiction, and this appeal is in time. Moreover, the appellant have been repeatedly made request to the respondents for delivering the order / comments on the departmental appeal, but they have been showed reluctance.

ATTESTED
& Accepted


MR. RAHMAN
Advocate High Court,
At Daggur

It is therefore humbly prayed that On acceptance of this service appeal the impugned

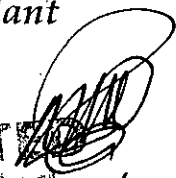
order may kindly be declared illegal, unlawful and unconstitutional, and the appellant may kindly be allowed to be regularize and any other benefits which this Honorable Tribunal may deems fit in the given circumstances of the case, may kindly be granted in favor of petitioner.

Any other remedy which is just, appropriate and efficacious may also be awarded in favor of the appellant, please.



Appellant

Through Counsel



ATTEST
& Accepted
Atin Ur Rehman
Advocate High Court
Advocate High Court,
At Daggur



BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. _____/2021

Sharif Ullah S/o Hafiz Gul R/o Manyari UC Gokand, Tehsil
Daggar, District Buner.....Appellant

VERSUS

Govt. of KPK and others..... Respondents

AFFIDAVIT

I, Sharif Ullah S/o Hafiz Gul R/o Manyari UC Gokand, Tehsil
Daggar, District Buner , do hereby solemnly affirm and declare on
oath that all the contents of this Service Appeal are true and correct to
the best of my knowledge and belief, and nothing has been kept
concealed from this Honorable Tribunal.

Identified by,

Alim Ur Rehman
Advocate High Court

DEPONENT

Appellant
Sharif Ullah

ATTESTED

UMAR SADIQ, Advocate,
OATH SWORN AT BUNER
District Courts Swat

No...313...Date...09/06/2021



BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. _____/2021

Sharif Ullah S/o Hafiz Gul R/o Manyari UC Gokand, Tehsil
Daggar, District Buner.....*Appellant*

VERSUS

Govt. of KPK and others..... *Respondents*

ADDRESSES OF THE PARTIES

ADDRESS OF THE APPELLANT

Sharif Ullah S/o Hafiz Gul R/o Manyari UC Gokand, Tehsil Daggar,
District Buner

CNIC: 15101-0420163-7

Cell: 03439016362

ADDRESS OF THE RESPONDENTS

- 1) Govt. of Khyber Pakhtunkhwa through Chief Secretary at
Peshawar
- 2) Conservator Forest Khyber Pakhtunkhwa Malakand Division
- 3) Divisional Forest Officer Buner

APPELLANT

Through Counsel

Alim Ur Rehman

Advocate, High Court

10

A

OFFICE ORDER NO. 09 DATED 26-08-09 ISSUED BY MR. MIR WALI KHAN DIVISIONAL FOREST OFFICER BUNER FOREST DIVISION AT SAWARI.

Consequent upon the recommendations of the Departmental Selection Committee Mr. Sharifullah son of Hafiz Gul of village Manyari Tehsil Dagger District Buner is hereby appointed as Forest Guard in BPS No.5 with usual allowances on contract basis as admissible under the rules against the vacant post under the scheme titled "Afforestation Project in Buner District: The order is being issued under the Government of NWFP Policy circulated vide Finance Department letter No. FD(SOR)-ii/12-1/2002 dated 26.10.2002. The appointment is purely temporary and can be terminated at any time. He cannot claim any right for pension liability in this post.

He will remain on the probational period of one year.

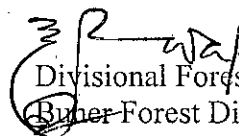
The appointment is subject to production of medical fitness certificate issued by the Medical Superintendent of district hospital.

Sd/-Mr. Mir Wali Khan
Divisional Forest officer
Buner Forest Divn, Swari.

No. 462-6S/G,

Copy forwarded to:

- ✓ 1) Conservator of Forests Malakand circle at Saidu Sharif Swat.
- ✓ 2) Mr. Sharifullah son of Hafiz Gul of village Manyari Tehsil Dagger district Buner for information and necessary action.
- 3) Head Clerk/Divl: Acctt: for information and necessary action.
- 4) Personal file for record.


Divisional Forest officer
Buner Forest Divn, Swari.

ATTESTED
& Accepted

AUR-RAHMAN
Advocate High Court,
At Daggar

To be true copy.

11

B



OFFICE OF THE DIVISIONAL FOREST OFFICER
BUNER FOREST DIVISION DAGGAR.

Ph: 0939-510114

Fax: 0939-510104.

No. 7360 /G, Dated Daggur the 31 /05/2013.

To

Mr. Sharifullah,
Forest Guard C/O
SDFO Daggur Forest Sub Division

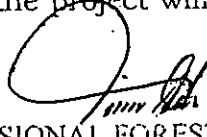
Subject:- **NOTICE.**

Memo:

You have been recruited in the post of Forest Guard as envisaged in the PC-I scheme titled "Afforestation Project in Buner District" specifying the project period will windup on 30.06.2013 due to which the services of the project employees will not required later on.

Therefore, keeping in view the provision of the PC-I scheme and the terms and conditions of your appointment order, you are hereby served with one month notice in advance that your services in the project will not be withheld after 30-06-2013.

Please acknowledge receipt.



DIVISIONAL FOREST OFFICER
BUNER FOREST DIVN: DAGGAR

No. /G,

Copy forwarded to the:-

- 1- Chief Conservator of Forests Malakand Forest Region (Region-III) at Swat for favour of information, please.
- 2- Conservator of Forests Malakand Forest Circle East at Shagai Saidu Sharif Swat for favour of information, please.
- 3- SDFO, Daggur Forest Sub Division for information and necessary action. He is directed to deliver the attached copy meant for the above named Forest Guard and submit the acknowledgement of the official immediately for record in this office.
- 4- Personal file of the official for record.
- 5- Head Clerk/Divisional Accountant for information and necessary action.

ATTESTED
& *verified and accepted to be true copy*


ADVOCATE HIGH COURT,
AT DAGGAR

DIVISIONAL FOREST OFFICER
BUNER FOREST DIVN: DAGGAR

WORKING PAPER FOR ENGAGEMENT OF SKILL LABOURS UNDER 10-BTAP IN BUNER FOREST DIVISION

The Project activities of 10- BTTP is under progress and the field formation of Buner Forest Division remained engagement in implementation and maintenance of the on-going Billion Tree Afforestation Project, besides other multifarious field activities such as protection, attending Courts and Patrolling. 12

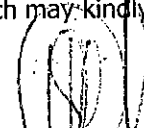
10- BTTP is another huge project with no provision of recruiting new staff except engaging skilled individuals on daily basis. Therefore, hiring the services of skilled individuals such as GIS and forest graduate, retired forester as supporting hand for effective and efficient implementation of 10-BTTP is badly needed.

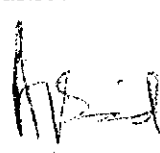
Keeping in view the requirement and experience in implementation of BTAP and skills of retired Foresters and Forest Guards/other individuals, their engagement is pre-requisite both technically and socially as per provision of PC-I of 10-BTTP Up-scaling of Green Pakistan Program at S. No. 6.11.8. In this connection the following 02 individuals at serial No.4 and 5 will be hired (purely on daily wage basis @ Rs.800 per day) in Buner Forest Division after recommendation/notification of the selection committee and approval of the chairman of selection committee.


S. No.	Name & Parentage	Qualification	District	Remarks
1	Mr. Sajjad Ali S/O Faiz Rasan	MSc Forestry	Buner	Expert in Monitoring, measurement of areas through GPS, nursery raising and Afforestation
2	Muhammad Zada S/O Lal Zada	B.Com	Buner	Computer Operator
3	Sher Aman S/O Mira Khan	Matric	Buner	Retired Forester expert in nursery raising and Afforestation
✓ 4	Mr. Sharifullah s/o Hafiz Gul	Matric	Buner	Served as a Forest Guard in the Afforestation Project in Buner District from 2009-10 to 2012-13. expert in nursery raising, Afforestation activities and measurement of the areas
5	Mr. Ansar Ali s/o Hamayun Khan	FA	Buner	-do-

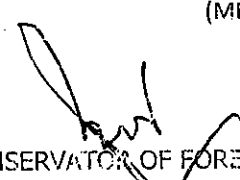
Individuals at S.No 01 to 03 has already been working, where as serial No. 04 and 05 are the additional/newly recommendees as per requirement.

The undersigned in the capacity of the Divisional Forest Officer Buner Forest Division and the Monitoring officer-III 10-BTTP recommend the above individuals for appointment on Daily Wage basis under 10-BTTP for Buner Forest Division which may kindly be approved please.


04/12/2020
MONITORING & EVALUATION OFFICER-III
10-BTTP PESHAWAR
(MEMBER OF SELECTION COMMITTEE)


DIVISIONAL FOREST OFFICER
BUNER FOREST DIVISION DAGGAR
(MEMBER OF SELECTION COMMITTEE)

ATTESTED

ADVOCATE


CONSERVATOR OF FORESTS
MALAKAND FOREST CIRCLE EAST SWAT
(CHAIRMAN) 4/12/20

04/12/2020

IN THE OFFICE OF CONSERVATOR
FOREST MALAKAND CIRCLE EAST SAIDU
SHARIF SWAT.

Sharif ullah S/O Hafiz Gul

R/o Manyari UC Gokand , Tehsil Daggar , Distict Buner.....

.....(Appellant)

VERSUS

i. Conservator Forest K.P.K Malakand Division .

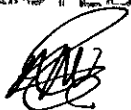
ii. Divisional Forest Officer Buner.....(Respondents)

SUBJECT: - DEPARTMENTAL APPEAL

Respectfully Sheweth as under :-

1. That the above named appellant have served your department as Forest guard BPs -5 under the scheme of your auspices namely "Aforestation Project in Buner District". The copy appointment order No: 08 dated 20/08/2009 is attached.

ATTESTED



ADVOCATE

2. That the appellate have served your afforestation scheme vigilantly sincerely in also in befitting manner being capable of the mentioned skill and profession and have not showed any slackness or failing on the part of appellant and remained will conversant and done all whatever required by the

Department without any reluctance and resistance.

3. That vide Notice No : 7354 dated 31/05/2013 issued by the DFO Buner have been recalled the recruitment order having no legal force in the eye of law because along with the present of appellant the other employees namely Mr. Liaq Ali , Mr. Zia uddin , Mr. Imran have been sustained intacted and remained as it is on the above appointing order and they have not de-appointed and have not served with the same notice and have illegal and discriminately maintain them despite the fact that all postings was based on contract scheme then why they have not served along with the appellant and have not deal them with the same mode and manner and hence committed illegality and irregularity which act is amenable to scrutiny and be decided on parity basis.

4. That the appellant have been discriminately dealed in the prevailing attending circumstances and the appellant is of hopeful to be adjusted and promoted along with back benefits warranted under the prevailing laws and regulations as the appellant have already served your office by rendering 5 years services without an fault on the part of appellant keeping in view the requirement and experience in the field and also his eligibility in the circumstances of the matter in hand.

ATTESTED



ADVOCATE

5. That all the above mentioned forest guards have regularized in the same order the appellant have been discriminated without any plausible and legal footing hence need to be regularized and may kindly be adjusted on permanent base to meet the ends of justice hence prayed accordingly .



Your Obediently:
Sharif Ullah Forest Guard.
BTTP-Skill labour

ATTESTED



ADVOCATE

<p>بار کونسل نمبر: <u>PC: 10-07-982</u></p> <p>بار ایسوسی ایشن نمبر: <u>10-07-982</u></p>	<p>دعویٰ نمبر: <u>8073</u></p> <p>District Bar Association SWAT</p> <p>DBA SWAT</p> <p>District Bar Association SWAT</p>
<p>ڈسٹرکٹ بار ایسوسی ایشن سوات</p> <p>رابطہ نمبر: <u>0334-5695393</u></p>	

بعدالت جناب: سرورس کیمپین لیبڈور کیمپ کورٹ سوات

<p>منجانب: <u>سید انور</u></p> <p>District Bar Association SWAT</p> <p>SWAT</p>	<p>دعویٰ اور خواست:</p> <p>علت نمبر:</p> <p>مورخہ:</p> <p>جرم:</p> <p>تھانہ:</p>
<p>بابت تحریر آئکہ</p>	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام سید انور کیلئے سید الرحمان اندوگہا کو مقرر کر کے اقرار کیا جاتا ہے، کہ صاحب موصوف کو مقدمہ کی کل کارروائی کو کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث کرنے، دعویٰ، جوائن، دعویٰ، اقبال، دعویٰ، اور درخواست برائے سرسبزی مقدمہ، منسوخی ڈگری یکطرفہ، اجراء و پیروی کرنے کا مختار ہوگا۔ نیز دائر کرنے اپیل نگرانی، نظر ثانی و پیروی کرنے کا مختار ہوگا۔ اور مقدمہ مذکورہ کیلئے کل وقتی یا جزوی کارروائی کیلئے کسی دیگر وکیل یا مختار قانون کو اپنے ہمرازہ بالائے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی جملہ مذکورہ اختیارات حاصل ہوں گے، اور اس کا ساختہ و پرداختہ منظور قبول ہوگا، بدوران مقدمہ جو خرچہ و ہرجانہ کسی بھی نسبت سے حاصل ہوگا، وہ وکیل موصوف وصول کرنے کا حقدار ہوگا، کوئی تاریخ پیشی مقام مذکورہ بالا سے باہر ہو، تو وکیل صاحب پیروی مقدمہ کرنے کے پابند نہ ہوں گے، مقدمہ کسی عدالت میں بعدم پیروی خارج ہونے یا ڈگری یکطرفہ ہونے کے صورت میں وکیل صاحب ذمہ دار نہیں ہوں گے،

لہذا وکالت نامہ لکھ دیا کہ سند ہو

مقام سید انور

کے لئے منظور ہے۔

ایڈوکیٹ دستخط: [Signature]

المقوم: 9/6/2021

لکھو اللہ ولد نصیطہ لکنہ ضیاء گوگند در پور



1. The first part of the document discusses the importance of maintaining accurate records of all transactions.

2. It is essential to ensure that all data is entered correctly and consistently.

3. Regular audits should be conducted to verify the accuracy of the information.

4. The system should be designed to be user-friendly and efficient.

5. Training should be provided to all users to ensure they can operate the system effectively.

6. Security measures should be implemented to protect the data from unauthorized access.

7. The system should be flexible enough to accommodate future changes and growth.

8. It is important to have a backup plan in case of a system failure.

9. The system should be able to generate reports and summaries in a clear and concise manner.

10. Finally, it is crucial to have a good understanding of the business processes that the system will be supporting.

11. The system should be able to handle a large volume of data without any loss of accuracy.

12. It is also important to have a good understanding of the legal requirements that apply to the data.

13. The system should be able to integrate with other systems that are already in use.

14. It is important to have a good understanding of the user requirements and to involve them in the design process.

15. The system should be able to handle complex queries and calculations.

16. It is important to have a good understanding of the hardware requirements and to choose the right equipment.

17. The system should be able to handle a wide range of data types and formats.

18. It is important to have a good understanding of the software requirements and to choose the right software.

19. The system should be able to handle a large number of users at the same time.

20. Finally, it is important to have a good understanding of the overall business strategy and to ensure that the system supports it.

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Sharif Ullah S/o Hafiz.

...Appellant

VERSUS

Govt. of Khyber Pakhtunkhwa & others

...Respondents

Service Appeal:

Application for impleadment of Conservator forest Malakand Circle East Saidu Sharif Swat as a respondent which in advertently not arrayed in the head note of the appeal.

ATTESTED



ADVOCATE

Respectfully Sheweth:

4. That the caption service appeal have been filed before this Honorable Court on dated: 10-06-2021 which was returned with the stated objections.
5. That while drafting & filling the appeal in hand the appellant in advertently and unintentionally not arrayed the propose impleading authority which is procedural defect and mistake which was occurred in face of the case filed.
6. That the proposed impleadment is very much essential for judge decision of the case and there is no legal hurdle exist to allow the application, So therefore your Honour may kindly be please to accept the application in the interest of justice.



Appellant through

Aleem Ur Rahman Advocate

High Court



BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Sharif Ullah S/o Hafiz.

...Appellant

VERSUS

Govt. of Khyber Pakhtunkhwa & others.

...Respondents

Certificate

It is certified and oath that no such like service appeal have been filed earlier
nor pending before the court nor decided on the subject matter.



Deponent

Sharif Ullah

ATTESTED



ADVOCATE

WORKING PAPER FOR ENGAGEMENT OF SKILL LABOURS UNDER 10-BTAP IN BUNER FOREST DIVISION

The Project activities of 10- BTTP is under progress and the field formation of Buner Forest Division remained engagement in implementation and maintenance of the on-going Billion Tree Afforestation Project, besides other multifarious field activities such as protection, attending Courts and Patrolling.

10- BTTP is another huge project with no provision of recruiting new staff except engaging skilled individuals on daily basis. Therefore, hiring the services of skilled individuals such as GIS and forest graduate, retired forester as supporting hand for effective and efficient implementation of 10-BTTP is badly needed.

Keeping in view the requirement and experience in implementation of BTAP and skills of retired Foresters and Forest Guards/other individuals, their engagement is pre-requisite both technically and socially as per provision of PC-I of 10-BTTP Up-scaling of Green Pakistan Program at S. No. 6.11.8. In this connection the following 02 individuals at serial No.4 and 5 will be hired (purely on daily wage basis @ Rs.800 per day) in Buner Forest Division after recommendation/notification of the selection committee and approval of the chairman of selection committee.

S. No.	Name & Parentage	Qualification	District	Remarks
1	Mr. Sajjad Ali S/O Faiz Rasan	MSc Forestry	Buner	Expert in Monitoring, measurement of areas through GPS, nursery raising and Afforestation
2	Muhammad Zada S/O Lal Zada	B.Com	Buner	Computer Operator
3	Sher Aman S/O Mira Khan	Matric	Buner	Retired Forester expert in nursery raising and Afforestation
4	Mr. Sharifullah s/o Hafiz Gul	Matric	Buner	Served as a Forest Guard in the Afforestation Project in Buner District from 2009-10 to 2012-13. expert in nursery raising, Afforestation activities and measurement of the areas
5	Mr. Ansar Ali s/o Hamayun Khan	FA	Buner	-do-

ATTESTED
 DIVISIONAL FOREST OFFICER
 BUNER FOREST DIVISION DAGGAR

Individuals at S.No 01 to 03 has already been working, where as serial No. 04 and 05 are the additional/newly recommendees as per requirement.

The undersigned in the capacity of the Divisional Forest Officer Buner Forest Division and the Monitoring officer-III 10-BTTP recommend the above individuals for appointment on Daily Wage basis under 10-BTTP for Buner Forest Division which may kindly be approved please.

04/12/2020

MONITORING & EVALUATION OFFICER-III
 10-BTTP PESHAWAR
 (MEMBER OF SELECTION COMMITTEE)

04/12/2020

DIVISIONAL FOREST OFFICER
 BUNER FOREST DIVISION DAGGAR
 (MEMBER OF SELECTION COMMITTEE)

4/12/2020


CONSERVATOR OF FORESTS
 MALAKAND FOREST CIRCLE EAST SWAT
 (CHAIRMAN)

The appeal of Mr. Sharifullah son of Hafiz r/o Manyari UC Gokand Tehsil daggar District Buner received today i.e. on 10.06.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Copy of impugned rejection order of departmental appeal mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.
- 3- Copy of new appointment order mentioned in para-6 of the memo of appeal is not attached with the appeal which may be placed on it. Order dated 4.12.2020 is recommendation for appointment but not appointment order.
- 4- The authority to whom the departmental appeal was made/preferred has not been arrayed a necessary party.
- 5- Appeal has not been flagged/annexed with annexures marks.
- 6- Annexures of the appeal may be attested.
- 7- Certificate be given to the effect that appellant has not filed any service appeal earlier on the subject matter in this form.

No. 463 /S.T.

Dt. 10/6 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Alim-ur-Rehman Adv.
High Court Buner.

Before the Dist Forest Officer Buner.

Sharifullah S/o Hafiz Gul R/o village
Mangari Gorkand Dist Buner.

(Applicant)

subject: Application for grant of copy
of appointment order Dtd 4/12/20
on Skill Labour (BTL) project.

Sir: Respectfully submitted as under:

1) That the above named applicant
have been appointed as a Skill Labour
in the stated project under your
auspices,

2) That the applicant have preferred
an appeal before the Service Tribunal
Peshawar then after the registration of
the honourable court have enclosed an
objection list directed to annex the
copy of order of appointment so therefore
kindly grant me the copy of order
Dtd 4/12/20 to meet the ends of
Justice -

Thanks

your obedient

Sharifullah

(Applicant)

11/6/21

[Signature]