

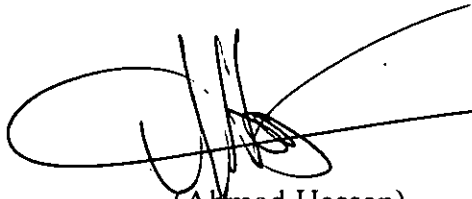
Order

26.11.2019

Appellant with counsel present. Mr. Usman Ghani, District Attorney alongwith Mr. M. Arif, Supdt for official respondents present. Arguments heard and record perused.

This appeal is also disposed of as per detailed judgment of today placed on file in service appeal no. 603/2017 titled "Fida Hussain -vs- Government of Khyber Pakhtunkhwa through Senior Member Board of Revenue, Peshawar and then others." Parties are left to bear their own cost. File be consigned to the record room.

Announced:
26.11.2019



(Ahmad Hassan)
Member



(Muhammad Hamid Mughal)
Member

27.06.2019 Junior to counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney alongwith Mr. Javed Assistant for the respondents present. Junior to counsel for the appellant seeks adjournment. Adjourned. Case to come up for arguments ~~on 07.08.2019~~ on 07.08.2019 before D.B.



(Hussain Shah)



(M. Ahmad Hassan)

07.08.2019

^{Member} Appellant present. Learned counsel for the ^{Member} appellant absent. Junior to counsel for the appellant present. Mr. Muhammad Jan learned Deputy District Attorney present. Junior to counsel for the appellant ~~and~~ again seeks adjournment. Adjourned on the payment of the cost of Rs.2000/- to be paid by the appellant. To come up for arguments on 30.10.2019 before D.B.



Member



Member

30.10.2019

Learned counsel for the appellant present. Mr. Zia Ullah learned Deputy District Attorney alongwith Muhammad Arif Superintendent for respondents present. Adjournment requested. Adjourn. To come up for arguments on 26.11.2019 before D.B.



Member



Member

16.01.2019

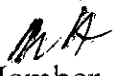
Counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Asst: AG for respondents present. Counsel for the appellant seeks adjournment. Adjourned. Case to come up for arguments on 11.03.2019 before D.B.



(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

11.03.2019


Junior to counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney for the respondents present. Junior to counsel for the appellant request for adjournment as senior counsel for the appellant is not in attendance. Adjourn. To come up for arguments on 02.05.2019 before D.B.


Member


Member

02.05.2019

Counsel for the appellant and Mr. Ziaullah, DDA alongwith Mr. M. Arif, Supdt for respondents present. Arguments could not be heard due to Learned Member (Executive) is on leave. Adjourned to 27.06.2019 before D.B.


(M. Amin Khan Kundi)
Member

17.10.2018

Counsel for the appellant present. Mr. Kabirulalh Khattak, Addl: AG for respondents present. None for private respondents no 6 to 8. Written reply on behalf of private respondents not submitted. Last opportunity granted. Case to come up for written reply/comments of private respondents no. 6 to 8 on 03.12.2018 before S.B.

(Ahmad Hassan)
Member

03.12.2018

Counsel for the appellant present. Mr. Muhammad Arif, Supdt alongwith Mr. Kabirullah Khattak, Addl: AG for respondents present.

The record shows that on previous two occasions private respondents no. 6 to 8 remained un-presented nor written reply on their behalf was submitted. They are therefore proceeded against Ex-parte. As comments/reply of official respondents has already been received. The appeal shall come up for arguments on 16.01.2019 before D.B.


Chairman

08.05.2018

The Tribunal is non-functional due to retirement of our Hon'ble Chairman. Therefore, the case is adjourned. To come up for same on 03.07.2018.


Reader

03.07.2018

Counsel for the appellant and Mr. Sardar Shaukat Hayat, Addl: AG alongwith Mr. Atta Ullah, Assistant Secretary for the respondents present. Written reply not submitted. Requested for adjournment. Adjourned. To come up for written reply/comments on 17.08.2018 before S.B.


Member

17.08.2018

Clerk to counsel for the appellant present. Mr. Attaullah, Asst: Secretary for official respondents no. 1 to 4 alongwith Mr. Kabirullah Khattak, Addl: AG present. Private respondents no. 5 to 7 are not present. Written reply on behalf of the official respondents no. 1 to 4 submitted. Case to come up for written reply/comments of the remaining respondents on 17.10.2018 before S.B.


Chairman

05.03.2017

Learned counsel for the appellant present. Preliminary arguments heard and case file perused.

Learned counsel for the appellant argued that the appellant was appointed as Patwari on regular post on 14.09.1988 and his service was confirmed on 06.04.1998. That the respondent no. 6 to 8 of the seniority were appointed on 14.01.1990 therefore, they are junior to the appellant but in the impugned seniority for the year 2016 issued in September/October, 2016 they have been placed on Serial N. 3 to 5 whereas the appellant has been placed at Serial No. 7, which is illegal and wrong. That the appellant applied for the above said seniority list. Which was provided to him on 05.10.2016. That no final or a speaking order has yet been passed by the appellate authority. That the appellant preferred departmental appeal which was not attached.


Points raised need consideration. Admitted for regular hearing subject to all legal objections including limitation. The appellant is also directed to deposit security and process within (10) days, whereafter notice be issued to the respondents department for written reply/comments on 23.04.2018 before S.B.

Appellant Deposited
Security & Process Fee


(Gul Zehra Khan)
Member

23.04.2018




Counsel for the appellant and Additional AG along with Mr. Atta Ullah Khan, Assistant Secretary for the respondents present. Written reply not submitted. Requested for adjournment. Adjourned. To come up for written reply/comments 08.05.2018 before S.B.


Member

Form-A
FORM OF ORDERSHEET

Court of _____

Case No. 130/2018


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	24/1/2018	<p>The appeal of Mr. Janat Khan resubmitted today by Mr. Mr. Asif Hameed Qureshi Advocate, may be entered in the Institution Register and put up to Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	06/02/18.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>12/02/18.</u></p> <p style="text-align: right;"> CHAIRMAN</p>
12.02.2018.	12.02.2018.	<p>Clerk of the counsel for appellant present and requested for adjournment on the ground that learned counsel for the appellant is not in attendance today due to strike of the Bar. Adjourned. To come up for preliminary hearing on 05.03.2018 before S.B.</p> <p style="text-align: right;"> (Muhammad Amin Khan Kundi) Member (J)</p>

The appeal of Mr. Janat Khan son of Nadar Khan r/o Patwari Lower Sadda Kurram Agency Parachinar received today i.e. on 17.01.2018 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 departmental appeal against the revised seniority list is not attached with the appeal which may be placed on it.
- 2- Addresses of respondent nos. 6 to 8 are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.

No. 132 /S.T.

Dt. 18/01 /2018

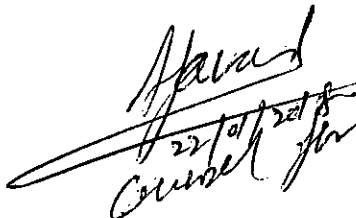

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Asif Hameed Qureshi Adv. Pesh.

Sir,

That through the instant appeal the appellant has challenged the original seniority list for the year 2016 issued in sept/oct and the same was not annexed inadvertently along with the instant appeal at the time of its filing, now the same has been annexed as annexure "B/1". The revised seniority list for the year 2016 has been issued in Dec. 2016 on the departmental appeal of the appellant but no final order has yet been passed by the competent appellate authority till date.

Resubmitted after compliance.


Counsel for the appellant



[The text in this section is extremely faint and illegible due to low contrast and scan quality. It appears to be several lines of a letter or document.]

BEFORE THE SERVICE TRIBUNAL, KPK, PESHAWAR.

Service Appeal No:- 130 /2018

Janat Khan

Versus

Senior Member Board of
Revenue (SMBR) & others
..... Respondents

..... Appellant



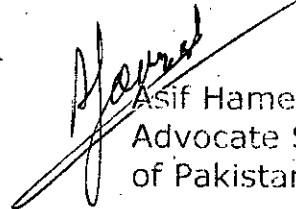
INDEX

S#	Description of the Documents	Annex	Pages
1.	<i>Grounds of Service Appeal with affidavit</i>	*	1-7
2.	<i>Copy of appointment letter</i>	"A"	8
3.	<i>Copy of departmental examination</i>	"B"	9-11
3-A	<i>Copy of impugned seniority list for 2016</i>	B/1	11A to 11E
4.	<i>Copy of list provided to the appellant</i>	"C"	12-15
5.	<i>Copy of departmental appeal 09/10/2017</i>	"D"	16-17
6.	<i>Copy of letter dated 27/10/2017</i>	"E"	18
7.	<i>Copy of letter dated 22/12/2017</i>	"F"	19
8.	<i>Copy of revised seniority list for the year, 2016</i>	"G"	20-22
9.	<i>Wakalat Nama</i>		23

Dated:- 10/01/2018

Appellant.

Through:-


Asif Hameed Qureshi
Advocate Supreme Court,
of Pakistan at Peshawar.

①

BEFORE THE SERVICE TRIBUNAL, KPK, PESHAWAR.

Service Appeal No:- 130 /2018

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 51

Dated 17-1-2018

Janat Khan S/o Nadir Khan R/o Patwari Lower Sadda
Kurram Agency, Parachinar.

..... Appellant

Versus

1. Senior Member Board of Revenue (SMBR), Civil Secretariat, Peshawar.
2. Director Board of SMBR, Civil Secretariat, Peshawar.
3. Political Agent Kurram, Parachinar, Kurram Agency.
4. Tehsildar Mehal Kurram, Tehsil & District Kurram Agency.
5. Assistant Secretary Establishment, Govt: of KPK, Board of Revenue & Estate Department, Peshawar.
6. Muhammad Amin S/o Baz Khan, cast Lisyani R/o Mula Bagh Parachinar, Kurram Agency, present Patwari Halqa, Upper Kurram Agency.
7. Ashiq Ali S/o Ghulam Ali, cast Bangash R/o Hassan Zai Zeran Parachinar, Kurram Agency, Patwari Halqa, Zarran Yousaf Khel, Upper Kurram Agency.

Filed to -
Registrar
17/1/18

Re-submitted to 8 day
and filed.
Registrar

..... Respondents

24/1/18



(2)

APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT, 1974 AGAINST THE SENIORITY LIST FOR THE YEAR, 2016 ISSUED BY RESPONDENT NO 4 IN SEPTEMBER /OCTOBER, 2016 TO THE EXTENT OF APPELLANT, WHO HAS BEEN PLACED/ENLISTED AT SERIAL NO 07 JUNIOR TO RESPONDENTS NO 6 TO 8 AND THE SAME IS ILLEGAL, WRONG AND INCORRECT AND LIABLE TO BE SET ASIDE/CORRECTED.

Prayer in Appeal:

By accepting the instant appeal, the impugned seniority list for the year, 2016 prepared/issued in September/October, 2016 to the extent of appellant placing at Serial No 07 may kindly be declared, illegal and the same may kindly be set aside by placing the appellant senior to respondents No 6 to 8 as per revised seniority list issued in December, 2016.

Respectfully Sheweth:-

Appellant submits as under:-

- 1. That the appellant was appointed as Patwari on regular post on 14/09/1988. (Copy of appointment letter is attached as annexure "A").*
- 2. That the service of the appellant was confirmed on 06/04/1998 and in this respect the entry has already been made in the impugned seniority list.*

3. That the appellant has passed the courses/examination of Patwari and field Qanoon Go in the year, 1991. (Copy of departmental examination is attached as annexure "B").

4. That the respondents No 6 to 8 were appointed on 14/01/1990 therefore, they are junior to appellant, but in the impugned seniority for the year 2016 issued in September/October, 2016 they have been placed at Serial No 3 to 5 whereas the appellant has placed at serial No 07, which is illegal and wrong.

(Copy of the seniority list for the year 2016 is attached as annexure B/1.)

5. That the appellant applied for the above said seniority list, which was provided to him on 05/10/2016. (Copy of list is attached as annexure "C")

6. That the appellant then preferred a Departmental Appeal to respondent No 1 on 09/10/2017 against the issuance of impugned seniority list for the year, 2016 to the extent of correction of his seniority. It is also pertinent to mention here that appellant has also recorded his objection on the impugned list when he was asked by the respondent No 4. (Copy of the departmental appeal is attached as annexure "D").

7. That on above Departmental Appeal, the respondent No 5 vide letter No 23188-89 dated 27/10/2017 directed the respondent No 3 for appropriate action in the matter who

4

then proceeded and in compliance of above said order directed the respondent No 4 for examining and necessary rectification in the impugned seniority list vide letter dated 22/12/2017. **(Copies of letter dated 27/10/2017 & 22/12/2017 are attached as annexure "E" & "F" respectively).**

8. That in compliance of the above stated letter of respondent No 3 the respondent No 4 prepared/issued revised seniority list for the year, 2016. **(Copy of the revised list for the year, 2016 is attached as annexure "G").**

9. That no final order has yet been passed by appellate authority on revised seniority list, therefore, the appellant is filing instant appeal against the impugned seniority list for the year, 2016 issued in September/ October, 2016 on the following amongst other grounds:-

Grounds:-

A. That the seniority list in question for the year, 2016 prepared in September/October, 2016 has wrongly been

issued to the extent of appellant because his appointment was made prior to respondents No 6 to 8.

- B. That the appellant has wrongly been placed at serial No 07 qua the respondents No 6 to 8, who were placed at Serial No 5 to 7 in the impugned seniority list issued in September/October, 2016, despite of the fact that they were appointed on 14/01/1990, whereas appellant was appointed on 14/09/1988.*
- C. That under the relevant provisions of law, the seniority of the officials shall be considered/reckoned from the date of appointment and there is no other criteria for considering the seniority under the law, therefore, the seniority list in question issued in September/October, 2016 to the extent of appellant is wrong, incorrect and illegal.*
- D. That the revised seniority list for the year, 2016 has been prepared and issued by respondent No 4 in December, 2016, but competent authority has not yet passed any order on the departmental appeal of the appellant, in which the appellant has been placed at Serial No 3 senior to respondent No 6 to 8.*
- E. That if the seniority list in question issued in September, October, 2016 is not corrected to the extent of seniority of the appellant, then he would be also deprived from his legal right of promotion to next higher post.*

(6)

F. That any other ground, which has not specifically taken in the instant Service Appeal, may be argued at the time of arguments with permission of this Honourable Tribunal.

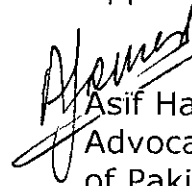
It is, therefore, humbly prayed that on acceptance of the instant appeal, the impugned seniority list issued in September/October, 2016 for the year, 2016 to the extant of appellant placing at Serial No 07 may kindly be declared, illegal and the same may kindly be set aside by placing the appellant senior to respondents No 6 to 8 in the light of revised seniority list for the year, 2016 issued in December, 2016.

Dated:- 10/01/2018



Appellant

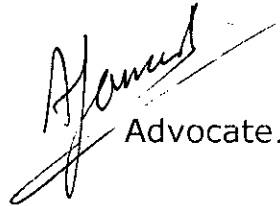
Through:-



Asif Hameed Qureshi
Advocate Supreme Court,
of Pakistan at Peshawar.

Note:-

As per instruction of my client, no such like Service Appeal has earlier been filed by the Appellant in this Honourable Tribunal.



Advocate.

7

BEFORE THE SERVICE TRIBUNAL, KPK, PESHAWAR.

Service Appeal No:- _____/2018

Janat Khan

Versus

Senior Member Board of
Revenue (SMBR) & others
..... Respondents

..... Appellant



AFFIDAVIT

I, Janat Khan S/o Nadir Khan R/o Putwari Lower
Sadda Kurram Agency, Parachinar, do hereby solemnly
affirm and declare on oath that the contents of this
accompanying Service Appeal are true and correct to the best
of my knowledge and belief and nothing has been concealed
from this Honourable Court.

10 JAN 2018
ATTESTED

Janat

DEPONENT
CNIC NO:- 21303-4455764-3



Handwritten initials/signature

M. Jamal-Khan

Political Agent, Kurram Agency, Peshawar
sd/-

1-Agency Accounts Officer Kurram Peshawar.
2-Deputy Magistrate Kurram Peshawar.
3-Officer concerned.
Copy forwarded to them-
Dated 14/9/1988.
No 10304-67/Asstt.

Political Agent, Kurram Agency, Peshawar
sd/-

The following Kurram candidates are hereby appointed as
parties in Kurram Agency w.o.t. 9.9.1988 on temporary and ad hoc
basis subject to the production of age & health certificates.
1. Mr. Ashiq Hussain s/o Khuda Hussain of Village Kund Alzai.
2. Mr. Iqbal Khan s/o Nader Khan of Village Dander.
Their appointment would be made regular only after they qualify
the relevant training from a relevant training school or the competent
authority after the passing of relevant examination in
their case.

Handwritten signature

(7)

(8)

ORDER

Amman B
 12-1

9

A

DIRECTORATE OF P. & R. RECORDS,
 F. I. P. A.
 P. SHAWAR DATED THE 10/02/1998

NOTIFICATION

No. 294 / 70-7/20/1998. The following candidates of NWFP who appeared in the departmental examination of Patwaris, held at Peshawar from 16-11-1997 to 19-11-1997, are hereby declared to have passed/failed in the papers noted against their names:-

S. NO.	NAME OF CANDIDATE	R. NO.	MARKS				
			PER I	PER II	PER III	PER IV	PER V
		56	120	70	50	60	50
1.	Riaz Ali Khan, S/O, Peshawar.	320	54	28	25	24	42
2.	Saud Khan, Patwari, Peshawar.	321	54	35	28	24	40
3.	Muhammad Humayyoun, Patwari, Peshawar.	322	54	28	29	24	39
4.	Mutabar Khan, S/O, Muhammad Khan, Patwari, Mardan.	323	48	35	28	26	41
5.	Muhammad Anwar S/O Karim Khan, Patwari District Mardan.	324	48	29	20	25	39
6.	Muhammad Khan S/O, Patwari, Mardan.	325	49	31	27	24	38
7.	Muhammad Hassan Shah, S/O Sajid Shah, Patwari Mardan.	337	54	36	27	24	42
8.	Rafiq-ur-Rahman S/O Shabar, Patwari Distt: Shangla.	352	56	35	-	24	38
9.	Muhammad Khan S/O Sawdan, Patwari Distt: Shangla.	353	54	35	30	24	37
10.	Muhammad Khan S/O Yasrullah Khan, Patwari, DT. Mardan.	354	62	42	28	24	48
11.	Muhammad Abbas S/O Ghulam Kasim, Patwari, Mardan.	355	68	31	20	24	38
12.	Muhammad Khan, Patwari Mardan.	367	52	-	-	-	-
13.	Muhammad Khan, Qaidawar Circle Mardan.	368	54	36	-	-	-
14.	Muhammad Hashid S/O Abdul Hamid, Patwari, District Mardan.	369	54	35	31	28	38
15.	Muhammad S/O, Patwari, Mardan.	374	54	37	30	28	45
16.	Muhammad S/O, Patwari, Mardan.	375	54	35	30	28	40

C.T. /
 Arif

M. H. /
 P

10

(S)

Better copy

S.NO	NAME OF CANDIDATES	R.NO	PA PER I 48/ 120	PA PER II 28/ 70	PA PER III 20/ 50	PA PER IV 24/ 60	PA PER V 20/ 50	
17.	Iqbal Hussain, S/o Syed Hussain Patwar, Kurram Agency.	377	62	28	27	24	37	178
18.	Sajjad Hussain, S/o Chiragh Hussain, Patwari Kurram Agency	378	50	21	28	24	40	163
19.	Mukhtar Ali S/o Mir Ali Patwari, Kurram Agency	379	48	29	30	24	33	164
20.	Israr Hussain S/o Gul Muhammad Patwari Kurram Agency	381	38	31	28	25	33	155
21.	Sharif Hussain S/o Sheraz Gul Patwari Kurram Agency	382	62	28	25	24	39	178
22.	Sharif Khan S/o Khakim Khan Patwari Kurram Agency	383	56	35	30	25	42	188
23.	Mir Afzal S/o Muhammad Afzal Patwari Kurram Agency	384	56	34	29	26	40	185
24.	Muhammad Amin S/o Raz Kahn Patwari Kurram Agency	385	52	31	29	24	38	174
25.	Ashq Hussain S/o Khalim Hussain Patwari Kurram Agency	386	49	37	30	24	37	177
26.	Alamgir Khan S/o Sardar Khan Patwari Kurram Agency	387	50	42	19	26	39	182
27.	Ashiq Hussain S/o Ghulam Ali Patwari Kurram Agency	389	48	31	30	26	36	171
28.	Jamat Khan S/o Nadir Khan Patwari Kurram Agency	390	66	35	28	24	39	192
29.	Mumtaz Ali Shah S/o Muhammad Akbar, Patwari Kurram Agency	391	56	16	27	24	37	160
30.	Noor Ul Basar S/o Abdul Rehman Patwari District Charsadda.	394	62	35	28	26	40	
31.	Ilaheem Khan Patwari District Mardan	399	54	36	28	26	38	
32.	Khalista Muhammad, Patwari District Swat.	402	-	-	-	26	-	
33.	Badi uz Zaman Patwari District Swat	403	54	-	-	-	37	
34.	Usman Shah Patwari District Swat	404	-	-	-	-	37	
35.	Muhammad Mulk Patwari District Swat	405	-	-	-	-	-	
36.	Ashraf Ali Patwari District Swat	407	-	-	-	-	-	
37.	Inayat ullah S/o Mian Din Patwari District Tank	411	48	35	30	24	35	
38.	Umar Farid S/o Sultan Jan Patwari District Karak	412	48	28	30	24	39	
39.	All Abbas S/o Hanan Patwari Karak	414	49	28	-	-	-	
40.	Abdul Saboor S/o Abdul Minir Patwari Karak	415	54	31	29	24	40	
41.	Glab Shaur S/o Khan Shaur Patwari Karak	418	49	29	29	24	37	
42.	Muhammad Alam S/o Gulshah Kahn Patwari Karak	420	48	-	-	-	-	

2006-17-2-2004

C.T.C
C.A.P

Attested by

C.T.C
H.M.

Amexame B

Annexure A-13
⑧

S.NO.	NAME OF CANDIDATES	R.NO.	PA	PA	PA	PA	PA
			PER I	PER II	PER III	PER IV	PER V
			42/120	28/70	20/50	24/60	20/50
17.	Iqbal Hussain, S/O Syed Hussain Patwar, Kurram Agency.	377	62	28	27	24	37
18.	Sajjad Hussain, S/O Ghirani Hussain, Patwari Kurram Agency	378	50	21	28	24	40
19.	Mukhtar Ali, S/O Mir Ali, Patwari Kurram Agency.	379	48	27	30	24	33
20.	Israr Hussain, S/O Gul Muhammad, Patwari Kurram Agency.	381	38	31	28	25	33
21.	Sharif Hussain S/O Sheraz Gul, Patwari Kurram Agency.	382	62	29	25	24	35
22.	Sharif Khan S/O Khaki Khan, Patwari Kurram Agency.	383	56	35	40	25	47
23.	Mir Afzal S/O Muhammad Afzal, Patwari Kurram Agency.	384	56	34	29	26	40
24.	Muhammad Amin Khan S/O Naz Khan, Patwari Kurram Agency.	385	52	31	29	24	31
25.	Ashiq Hussain, S/O Khadim Hussain Patwari, Kurram Agency.	386	48	37	30	24	37
26.	Yamgir Khan S/O Sardar Khan, Patwari, Kurram Agency.	387	56	42	19	26	31
27.	Ashiq Hussain, S/O Ghulam Ali, Patwari, Kurram Agency.	389	48	31	30	26	31
28.	Jenat Khan, S/O Anadir Khan, Patwari, Kurram Agency.	393	66	35	28	24	31
29.	Mumtaz Ali Shah S/O Muhammad Akbar, Patwari, Kurram Agency.	391	56	16	27	24	5
30.	Noor ul Besar S/O Abdul Rehman, Patwari, District Charsadda.	394	62	35	28	26	4
31.	Raheem Khan, Patwari, District Mardan.	399	54	36	28	26	3
32.	Khaisa Muhammad, Patwari, District Swat.	402	-	-	-	26	0
33.	Badi-uz-Zaman, Patwari, District Swat.	408	54	-	-	-	-
34.	Usman Shah, Patwari, District Swat.	404	-	-	-	-	-
35.	Muhammad Mulk, Patwari, District Swat.	405	-	-	-	-	-
36.	Ashraf Ali, Patwari, District Swat.	407	-	-	-	-	-
37.	Inayat Ullah S/O Mian Dawood Ustewari, District Tank.	411	48	35	30	24	-
38.	Omer Parid S/O Sultan Jan, Patwari, District Kbrak.	412	48	38	30	24	-
39.	Ali Abbass S/O Hanaf, Patwari, Karak.	414	49	28	-	-	-
40.	Abdul Saboor S/O Abdul Manir, Patwari, Karak.	415	54	31	29	24	-
41.	Gulab, Sheur S/O Khan Sheur, Patwari, Karak.	418	49	29	29	24	-
42.	Muhammad Ali S/O Gulshan Min, Patwari, Karak.	420	48	-	-	-	-

30

HH

CTC

[Handwritten signature]

[Handwritten signature]

⑧

CTC
[Handwritten signature]

(cont. P/3)

6-4-1984	9-1988-91-6-1987	5-4-1969	5-4-1969	6-4-1984	6-4-1984	6-4-1984	6-4-1984
15-1-1990-18-7-1984	6-4-1984-1-1990-18-7-1984	12-4-1968	18-3-1963	6-4-1984-1-1990-18-7-1984	16-1-1966	9-9-9-1965	6-4-1984-15-12-1987-18-7-1984
6-4-1984	6-4-1984	3-3-1964	16-1-1966	6-4-1984	9-9-9-1965	6-4-1984	6-4-1984
6-4-1984	6-4-1984	6-4-1984	6-4-1984	6-4-1984	6-4-1984	6-4-1984	6-4-1984

11-A
 13/1
 11-A
 2016

(11-13)

مجلس - 11/13

11/13

11/13

مجلس - 11/13



(11-2)

6-4-1984-9-1988 24-6-1987	5-4-1969	مكتبة	مكتبة	7
715-6018 295 6-4-1998/18-1-1992 29-6-1987	11-5-1970	مكتبة	مكتبة	8
17-2-2006 21-7-1996 11-11-1995	15-2-1970	مكتبة	مكتبة	10
98-3-2002 9-6-1987	5-3-1967	مكتبة	مكتبة	11
98-3-2000 2-10-1997	3-1-1972	مكتبة	مكتبة	12
7-5-2013 11-11-2004 24-9-2004	26-5-1979	مكتبة	مكتبة	14
16-5-2014 14-2-2006 24-9-2004	2-5-1979	مكتبة	مكتبة	15

715-6018 295
 17-2-2006 21-7-1996 11-11-1995
 98-3-2002 9-6-1987
 98-3-2000 2-10-1997
 7-5-2013 11-11-2004 24-9-2004
 16-5-2014 14-2-2006 24-9-2004

مكتبة

(11-17)

13-2-1988

13-2-1988

1986

1987

1988

1989

15-7-2013	28-4-2008	17-7-2006	MA+	22-3-1987	"	مدير	19
24-7-2013	2-2-2011	17-7-2006	BA	30-4-1988	"	مدير	20
14-4-2008	17-7-2006		FSAC	7-7-1984	"	مدير	18
18-5-2006	14-11-2005		FA	6-2-1986	"	مدير	17
24-2-2011	14-2-2006	14-11-2005	FA	7-2-1983	"	مدير	16
24-2-2011	14-2-2006	14-11-2005	FA	7-2-1983	"	مدير	16
24-2-2011	14-2-2006	14-11-2005	FA	7-2-1983	"	مدير	16
24-2-2011	14-2-2006	14-11-2005	FA	7-2-1983	"	مدير	16
24-2-2011	14-2-2006	14-11-2005	FA	7-2-1983	"	مدير	16
24-2-2011	14-2-2006	14-11-2005	FA	7-2-1983	"	مدير	16
24-2-2011	14-2-2006	14-11-2005	FA	7-2-1983	"	مدير	16

Handwritten notes and signatures in the left margin.

MA 13-2-1988

Handwritten notes and signatures at the bottom of the page.

بجانب

(11/1)

5-3-2002	17-7-2006	M.A.	13-2-1982			دکتر محمد قاسم قریشی صاحب
10-11-2015	24-6-2013	F.S.C.	20-3-1984			محمد شاکر صاحب
	27-6-2014	F.S.C.	3-3-1982			سید طاہر حسین صاحب
	24-6-2013	F.A.	6-3-1980			سرمد علی صاحب

محمد قاسم قریشی

تفصیل مطابق

Amman

نقل مطابق

از سرشت صدر قانو نلو ورم احمسی صدر قانو نلو

سیناری لیسٹ پٹواریان از سرشت پٹواریان سے تیار کیا گیا - جوہ شامل ہوا
 اگر کسی کو کوئی اعتراض ہو تو وہ اپنا رائے پیش کریں

- | نمبر | نام پٹواری | رقبہ | کیفیت |
|------|--|------|-------|
| 1 | محمد امین خان پٹواری مرتبہ سیناری لیسٹ پر میرا کوئی اعتراض و شکایت نہیں ہے | | |
| 2 | عاشق علی پٹواری سیناری لیسٹ پر جو 1999 سے مرتب شدہ ہے اس میں کوئی اعتراض نہیں ہے | | |
| 3 | عالمگیر خان " مرتبہ شدہ سیناری لیسٹ پر میرا کوئی اعتراض نہیں ہے " 18/9/2017 | | |
| 4 | ایمن عزیز " مرتبہ شدہ سیناری لیسٹ پر میرا کوئی اعتراض و شکایت نہیں ہے " 18/9/2017 | | |
| 5 | حسین خان " سیناری لیسٹ پر میرا کوئی اعتراض نہیں ہے " 14/9/2017 | | |
| 6 | سید عطاء علی شاہ " مرتبہ شدہ سیناری لیسٹ پر میرا کوئی اعتراض نہیں ہے " 18/9/2017 | | |
| 7 | محمد حسین " اللہ نون سے مطابق اعتراضات پر عمل کر کے 565 سہری ٹوٹوں کی فہرست تیار کی گئی ہے " 18/9/2017 | | |

ATC
 [Signature]

۸) فدا حسین دہلوی اس سلسلے میں سرگودھا میں ۱۹۰۳ء میں ایک حکم جملہ دستاویزوں کے ساتھ مندرجہ ذیل تاریخوں پر پیش کیا گیا تھا اور اس کی

۹) محمد زمان " سیارٹی لیسٹ پر میں نے قبضے کی ایک کاپی اپنے پاس رکھی ہے جو کہ میں رجسٹر آفیسر داران سے کی گئی ہے جس پر رجسٹر آفیسر نے

۱۰) اکبر حسین " سیارٹی لیسٹ پر میرا دستاویز " کوئی نام نہ

۱۱) امیر حسین " رجسٹر آفیسر نے میری سیارٹی لیسٹ پر دستاویز

۱۲) سکندر علی " مدنیہ سیارٹی لیسٹ پر میرا کوئی دستاویز نہیں ہے

۱۳) حمید اقبال " مرتبہ سیارٹی لیسٹ پر میرا کوئی دستاویز نہیں ہے

۱۴) دلدار حسین " مرتبہ سیارٹی لیسٹ پر میرا کوئی دستاویز نہیں ہے

۱۵) عمران خان " مرتبہ سیارٹی لیسٹ پر میرا کوئی دستاویز نہیں ہے

۱۶) محمد مصطفیٰ " مرتبہ سیارٹی لیسٹ پر میرا کوئی دستاویز نہیں ہے

۱۷) افتخار حسین " مرتبہ سیارٹی لیسٹ پر میرا کوئی دستاویز نہیں ہے

اصل مطابق اصل
محمد قالی خان

محمد قالی خان

(12)

18) غلام محمد حسین مذاکرہ فی مہینہ ستمبر ۱۹۱۹ء

19) دلدار حسین " مرتبہ ستمبر لست ہر ویں اعتراض و شکایتیں

20) محمد فاروق " مرتبہ ستمبر ستمبر لست ہر ویں اعتراض و شکایتیں
(12)

21) سید محمد حسین " ستمبر ستمبر لست ہر ویں اعتراض و شکایتیں

22) لبرالہ خان " مرتبہ ستمبر ستمبر لست ہر ویں اعتراض و شکایتیں

C.F.C.
Handwritten signature

نقل مطابق اصل سے
Handwritten signature
مسٹر ای. ٹی. کوبرا

(15)

(e/b)

5/2/2017
5/2/2017
5/2/2017
10/1
11/1
11/1
12/5/4

CTN
JW

محفوظ حساب سٹیٹ بینک پورٹ آف ریگولیشنز کراچی

Amman

(راپیدلٹ انٹرنیشنل)

اپیل درخواست مابت عدالت گورنر اور راج در
سیارٹی لیٹ سال 2016ء کو کرم ایجنسی جاری کردہ جو لیکچرر ایجنٹ
مقام کرم مقام پارٹ جینار -

Dy No 5642
P. 8/5/82
9/15/17

جواب دہی

سائل اپیلانٹ حسب ذیل غلطیوں پر توجہ فرمائیں۔
1- سیکرٹریاں کی سیارٹی لیٹ سال 2016ء کو خطاب جو لیکچرر ایجنٹ
کرم مقام پارٹ جینار جاری کی ہے جس میں سائل اپیلانٹ کو سیکرٹری
پر 7 سیکرٹریاں سے جبکہ سائل سے جو سٹیٹ بینک پورٹ آف ریگولیشنز
میں سے سائل علی اور علی علی خان کو سیکرٹری فرم 5 مانتے ہیں
لکھا گیا ہے جو کہ غلط، خلاف ریکارڈ و قانون ہے ایف ایس سی
لیٹ سال 2016ء کو لکھا گیا ہے۔

2- سائل اپیلانٹ کی بھرتی مورخہ 09/09/1988ء کو ریگولیشنز
پر کی گئی ہے جبکہ مذکورہ بالا سیکرٹریاں کی تقرری مورخہ 01/01/1990ء
کی گئی ہے جبکہ سائل اور مذکورہ سیکرٹریاں کی مستغلی ان سروس
ایک ہی تاریخ یعنی 06/04/1998ء کی گئی ہے جو سیکرٹری لیٹ میں درج ہے۔

3- سیکرٹری لیٹ سال 2016ء میں تا حد سائل اپیلانٹ
غلط اور خلاف قانون جاری کی گئی ہے کیونکہ سائل کی تعیناتی
ریگولیشنز پر مذکورہ بالا سیکرٹریاں سے قبل ہوئی ہے اس
لیئے قانون مورخہ کے تحت سائل اپیلانٹ ان سے سٹیٹ بینک سے

4- سائل نے سیکرٹری لیٹ سال 2016ء کے سٹیٹ بینک کے مورخہ 10/05/17ء
کو ایک درخواست گزاری اور اسی روز سائل نے سیکرٹری لیٹ دی گئی۔

Handwritten signature or initials on the right margin.

5- یہ کہ سفیادٹی کمیٹی سال 2016ء کے لیے متعلقہ انتخابات کے حوالے سے
پتواریوں سے اظہارِ اہتمام کے لیے کوئی کامیاب پتواریوں
نے ایذا ریزیہ مذکورہ بالا فریو کیا ہے۔ (فصل درج کرن اظہارِ اہتمام
بہ سفیادٹی کمیٹی کے لیے)

6- یہ کہ مذکورہ بالا گزارشات کی روشنی میں مسائل کا فائلوں کے تحت
سے کم و بیش مسیحا محمد امین، عاشق علی اور عامر پتواریوں سے
سٹیٹ فریو کیا کر رہی تھی تاہم مسائل اور ان کے حوالے سے

7- یہ کہ اگر سفیادٹی کمیٹی سال 2016ء کے انتخابات کی درستگی کے مسائل
مذکورہ گزارشات مذکورہ بالا عمل میں نہ لائی گئی تو مسائل کو ناقابل
تلافی نقصان پہنچنے کا اندیشہ ہے اور اس کے ساتھ ساتھ انسانی
ہونے۔

لہذا اس کے لیے مناسب طور پر درخواست / رپورٹ فراہم
اس کے لیے سالانہ گزارشات سفیادٹی کمیٹی سال 2016ء میں تاہم مسائل
کا اندراج درست فرمایا جائے اس کے لیے یہ بھی یاد دہانی ہے کہ
17/10/09ء کو اس کے احکامات جاری فرمائے جائیں۔

09/10/17

محمد علی پتواری
محمد علی پتواری
محمد علی پتواری

CT
M

بیانِ عملی

منہ جنت خان ولد ناصر خان امن
پتواری کوٹر صدر حلقہ بیان کرنا ہوگی
علم سرگت ماڑا در خواست صدر اسٹریٹ
پتواریوں سے ملے ہوئے و درست ہیں۔

محمد علی پتواری

(18)

GOVERNMENT OF KHYBER PAKHTUNKHWA
BOARD OF REVENUE
REVENUE & ESTATE DEPARTMENT

No. Estt:VII DPC Kurram 23/88-89
Peshawar dated the 27/10/2017

Amir
(B)

To

The Political Agent
Kurram Agency

SUBJECT:- APPEAL REGARDING CORRECTION OF SENIORITY LIST.

I am directed to enclose herewith a copy of appeal alongwith its enclosures submitted by one Mr. Janat Khan Patwari of Kurram Agency for appropriate action, please.

[Signature]
Assistant Secretary (Estt)

Atty
[Signature]

No. Estt:VII DPC Kurram.

Copy for information is forwarded to Mr. Janat Khan Patwari of Kurram Agency

Assistant Secretary (Estt)

Acctt:
For necessary action

[Signature]

4479
2/11/17

PAK
6/11/17

Registrar

119

Amir Khan
(E)

OFFICE OF THE POLITICAL AGENT
KURRAM AGENCY, PARACHINAR
No 3403-5 /PAK/Acctt:
Dated 22-12 /2017

To,

The Assistant Political Agent,
Upper Kurram, Parachinar.

Subject

APPEAL REGARDING CORRECTION OF SENIORITY LIST

Memo

Enclosed Please find a letter No. Esstt:VII/DPC/Kurram/23188-89 dated 27.10.2017 in original along with application submitted by one Mr. Jannat Khan, Patwari wherein the individual made a request for correction of seniority list and challenged the seniority of his other three colleagues namely Mr. Muhammad Amin Khan Patwari, Mr. Ashiq Ali Patwari and Mr. Alamgir Khan Patwari indicated at Serial No. 3,4 and 5 of the enclosed seniority list for examining and necessary rectification of the seniority list in accordance with their service record and in light of Section-8 Seniority Clause (3) of NWFP(KPK) Civil Service Laws under intimation to this office for further proceeding in light of non-contentious rectified seniority list.

Political Agent, Kurram

No & Date Even:

Copy forwarded to the:

1. The Registrar, Peshawar High Court, Peshawar with reference to judgment dated. 02.11.2017 for information please.
2. Assistant Secretary (Esstt), Government of Khyber Pakhtunkhwa Board of Revenue and Estate Department, Peshawar for information with reference to his memo No. cited above please.

Political Agent, Kurram

TM
For n/a grant
report

OPM
26/12

NO: 7887/APA (wa) - 2017
DT: 27.12.17

20

Amendment 2
6

تعمیرات کے لئے
تعمیرات کے لئے

نقل مطالبہ اصل ہے
صدر کی نوٹس کو
دہشت
6-4-1998

ریجنل انڈسٹری کمیشن کی طرف سے
اپنی باہت سال

تعمیرات کے لئے
تعمیرات کے لئے

6-4-1998
15-12-1987
FA
6-4-1961
تعمیرات کے لئے

6-4-1998
15-12-1987
FA
22-9-1965
تعمیرات کے لئے

6-4-1998
14-9-1988
ممبر
5-4-1969
تعمیرات کے لئے

6-4-1998
14-1-1990
ممبر
16-1-1966
تعمیرات کے لئے

6-4-1998
14-1-1990
BA
3-3-1964
تعمیرات کے لئے

6-4-1998
14-1-1990
ممبر
12-4-1966
تعمیرات کے لئے

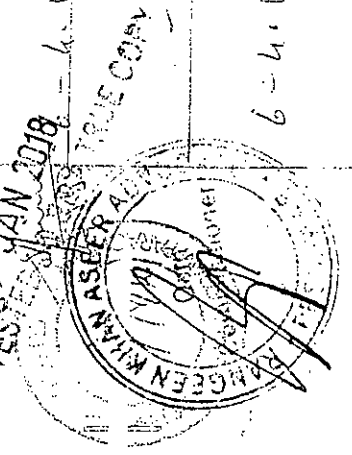
6-4-1998
15-1-1990
ممبر
18-3-1963
تعمیرات کے لئے

6-4-1998
18-1-1992
ممبر
11-5-1970
تعمیرات کے لئے

6-4-1998
18-1-1992
ممبر
11-5-1970
تعمیرات کے لئے

22-12-17
3403-5 PAK Accredited
حکم ذریعہ PPA کے تحت

Appeal Regarding
Correction of Seniority
List
ATTESTED
22 JAN 2018
TRUE COPY



Handwritten signatures and initials at the top of the page.

(21)

21

گورنمنٹ
پرائمری سکول

گورنمنٹ پرائمری سکول
گورنمنٹ پرائمری سکول

(21)

تفصیلات درج ذیل ہیں۔
گورنمنٹ پرائمری سکول

گورنمنٹ پرائمری سکول	گورنمنٹ پرائمری سکول	گورنمنٹ پرائمری سکول	گورنمنٹ پرائمری سکول	گورنمنٹ پرائمری سکول	گورنمنٹ پرائمری سکول	گورنمنٹ پرائمری سکول
----------------------	----------------------	----------------------	----------------------	----------------------	----------------------	----------------------

17. 2. 2006 22-7-1946 FA 2.4.1969 گورنمنٹ پرائمری سکول

17. 2. 2006 22.7. 1946 MA 15.2.1970 گورنمنٹ پرائمری سکول

28-3-2000 FA 5-3-1967 گورنمنٹ پرائمری سکول

28-3-2000 BSC 20.3.1968 گورنمنٹ پرائمری سکول

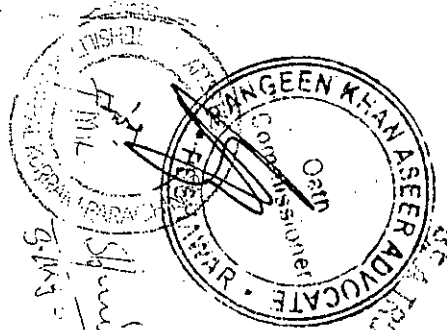
28-3-2000 BA 3-1-1972 گورنمنٹ پرائمری سکول

7-5-2013 11.11.2004 FA 26-5-1969 گورنمنٹ پرائمری سکول

16.5.2014 1-2-2006 FA 9-5-1979 گورنمنٹ پرائمری سکول

1-2-2006 FA 7.2.1983 گورنمنٹ پرائمری سکول

21.9.2006 FA 6-2-1986 گورنمنٹ پرائمری سکول



09 JAN 2018
ATTESTED TO BE

Handwritten signature and initials at the bottom of the page.

31

دینا پورہ کی تحصیل کے ایک زمیندار کے نام سے

دینا پورہ کی تحصیل کے ایک زمیندار کے نام سے

تاریخ مستقل

تاریخ تقریر

تعلیمی قابلیت

تاریخ پیدائش

درجہ

نوع تجارتی مصروفیت

تعمیرات

14.4.2008

FSC

7.4.1984

11 بجواری

گورنمنٹ ہائی اسکول

14

15.7.2013

16.6.2010

MA

22.3.1987

11 بجواری

پرائمری اسکول

18

24.7.2013

15-2-2011

BA

30.4.1985

11 بجواری

پرائمری اسکول

20

5-3-2012

MA

13.2.1989

11 بجواری

پرائمری اسکول

21

24.6.2013

FA

6.3.1980

11 بجواری

پرائمری اسکول

22

10.11.2015

28.6.2013

MA

20.3.1984

11 بجواری

پرائمری اسکول

23

28.6.2014

FSC/DIT

3-3-1987

11 بجواری

پرائمری اسکول

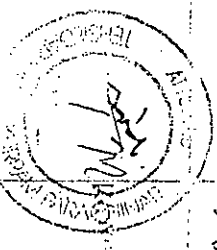
24

مستطاب مسیحی

09 JAN 2018
ATTESTED TO BE A TRUE COPY



Shiraz
1850



Handwritten signatures and notes in a box.

Handwritten signature and initials at the bottom.

10



4784

ایڈووکیٹ: *[Signature]*

بار کونسل ایسوسی ایشن نمبر: 498

رابطہ نمبر: 0321-9116224

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: *[Signature]* سروس ٹریبونل KPK ایف و

منجانب: <i>[Signature]</i> ریسپلانڈ	دعویٰ: <i>[Signature]</i> سروس ٹریبونل
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

صفت خان بنام SBR مورخہ

بابت تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
 آن مقام کیلئے۔ *[Signature]* کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زیریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی، نیز
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقریر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب باہم بندہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المقام: *[Signature]*

213-3-4455761-3

واحد

المقام (ریسپلانڈ)

[Signature]
Accepted

نوٹ: اس وکالت نامہ کی ذمہ داری ناقابل قبول ہوگی۔

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWR
Service Appeal No 130/2018

Jannat Khan S/o Nadar Khan R/O Patwari Lower Sadda Kurram Agency Parachinar.

Appellant.

Versus

1. Senior Member Board of Revenue (SMBR) Civil Secretariat , Peshawar.
2. Director Board of SMBR , Civil Secretariat Peshawar.
3. Political Agent, Kurram Parachinar Kurram Agency.
4. Tehsildar Mahal Kurram , Tehsil & District Kurram Agency.
5. Assistant Secretary Establishment Govt of KPK , Board of Revenue & Estate Deptt: Peshawar
6. Muhammad Amin Khan S/O Baz Khan caste Lisyani R/O Mula Bagh Parachinar Kurram Agency.
7. Ashiq Ali S/O Ghulam Afi , Caste Bangash R/O Hassan Zai Zeran Parachinar Kurram Agency
8. Alamgir S/O Sarwar Khan, caste Bangash Bushehra Parachinar Kurram Agency

Respondents

Subject:- PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO.1 TO 5.

Respectfully Shewith

Preliminary Objections.

- 1- That the appellant has got no cause of action .
- 2- That the instant of appeal is not maintainable .
- 3- That the appellant has got no locus standi
- 4- That the appellant has not come to the court with clean hand.


Reply of facts.


- 1- Pertains to record hence no comments.
- 2- His name was entered in the seniority list
- 3- The appellant has passed the examination of Field Kanungo in the year, 1999
- 4- Incorrect .The revised seniority list , 2016 and seniority list, 2017 was carefully maintained and accordingly. The appellant was placed at serial No.03. Therefore the rest of the Patwaris comes junior to the appellant (seniority list attached as Annexure- A & B).
- 5- Correct. The revised seniority list was not provided to the appellant as desired by him.
- 6- Correct. As per direction of Senior Member Board of Revenue KPK Peshawar , the revised seniority list ,2016 was prepared and forward to Senior Member Board of Revenue KPK Peshawar vide this office letter No.554/PAK/Acctt: dated 09.02.2018 (Copy enclosed) .
- 7- Correct. The appropriate action was taken in shape of preparation of revised seniority list ,2016.
- 8- Correct .
- 9- No order has yet been passed.


Correct. The seniority list was issued in the year, 2016 The appellant filed an appeal against the said seniority list in the court of Senior Member Board of Revenue & Estate Department Peshawar. The Senior Member Board of Revenue & Estate Department Peshawar directed this office to correct the seniority list as such this office prepared revised seniority list, 2016 (copy attached).


- B. The appellant was placed at his own No according to revised seniority list, 2016
- C. Incorrect. As explained at Para-A
- D. As replied in Para above.
- E. According to revised seniority list the appellant placed at Serial.No.03 he will be promoted on his turn.
- F. That the respondents seek permission to raise additional grounds at the time of arguments

In view of the above the appellant has been given all rights regarding his entitlement and his claim at this stage is not tenable. It is requested that the appeal may be dismissed.


Senior Member,
Govt. of KPK, Board of Revenue
& Estate Department, Peshawar.


Director,
Govt. of KPK, Board of Rev:
& Estate Deptt., Peshawar

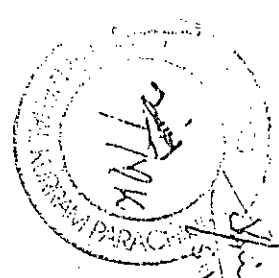

Assistant Secretary (Estab),
Govt. of KPK, Board of Rev:
& Estate Deptt., Peshawar.


Deputy Commissioner
Kurram Triba Distract

کتابخانه
موسسه تحقیقاتی گیاهشناسی و باغبانی
تهران

A
تاریخ ثبت: ۱۳۵۷
شماره ثبت: ۱۱۰۵

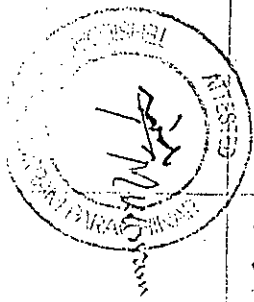
ردیف	عنوان کتاب	تاریخ ثبت	نوع سند	تاریخ دریافت	محل نگهداری	توضیحات	تاریخ
۱	مجموعه کتابهای ... ۶-۴-۱۹۹۸	۱۵-۱۲-۱۹۸۷	FA	۶-۲-۱۹۶۱	مردار	کتابهای ...	۲
۲	مجموعه کتابهای ... ۶-۴-۱۹۹۸	۱۵-۱۲-۱۹۸۷	FA	۲۲-۹-۱۹۶۵	مجله	کتابهای ...	۳
۳	مجموعه کتابهای ... ۶-۴-۱۹۹۸	۱۴-۹-۱۹۸۸	مجله	۵-۴-۱۹۶۹	مجله	کتابهای ...	۴
۴	مجموعه کتابهای ... ۶-۴-۱۹۹۸	۱۴-۱-۱۹۹۰	مجله	۱۶-۱-۱۹۶۶	مجله	کتابهای ...	۵
۵	مجموعه کتابهای ... ۶-۴-۱۹۹۸	۱۴-۱-۱۹۹۰	BA	۳-۳-۱۹۶۴	مجله	کتابهای ...	۶
۶	مجموعه کتابهای ... ۶-۴-۱۹۹۸	۱۴-۱-۱۹۹۰	مجله	۱۲-۴-۱۹۶۶	مجله	کتابهای ...	۷
۷	مجموعه کتابهای ... ۶-۴-۱۹۹۸	۱۵-۱-۱۹۹۰	مجله	۱۸-۳-۱۹۶۳	مجله	کتابهای ...	۸
۸	مجموعه کتابهای ... ۶-۴-۱۹۹۸	۱۸-۱-۱۹۹۲	مجله	۱۱-۵-۱۹۶۰	مجله	کتابهای ...	۹



مجموعه کتابهای ...
تاریخ ثبت: ۱۳۵۷

رہنما اور سربراہان کی فہرست

1	14-4-2008	FSC	7-4-1984	پروفیسر	پروفیسر	پروفیسر	پروفیسر	پروفیسر
2	16-6-2010	MA	22-3-1987	پروفیسر	پروفیسر	پروفیسر	پروفیسر	پروفیسر
3	15-7-2013	BA	30-4-1985	پروفیسر	پروفیسر	پروفیسر	پروفیسر	پروفیسر
4	5-3-2019	MA	13-9-1982	پروفیسر	پروفیسر	پروفیسر	پروفیسر	پروفیسر
5	24-6-2013	FA	6-3-1980	پروفیسر	پروفیسر	پروفیسر	پروفیسر	پروفیسر
6	10-11-2015	MA	20-3-1984	پروفیسر	پروفیسر	پروفیسر	پروفیسر	پروفیسر
7	28-6-2014	FSC/DIT	3-3-1987	پروفیسر	پروفیسر	پروفیسر	پروفیسر	پروفیسر



Signature
2019

گورنمنٹ ہسپتال ایچی ماہیت سال 1967

تعلقہ ماہیت، ٹاڈا، سندھ

ٹاڈا، سندھ

ڈاکٹر

گورنمنٹ ہسپتال

15/12/41 - 12/12/41
15/12/41 - 12/12/41
15/12/41 - 12/12/41

6-3-1961

گورنمنٹ ہسپتال

گورنمنٹ ہسپتال ایچی ماہیت

گورنمنٹ ہسپتال

15/12/41 - 12/12/41
15/12/41 - 12/12/41
15/12/41 - 12/12/41

88-9-1965

گورنمنٹ ہسپتال

گورنمنٹ ہسپتال ایچی ماہیت

گورنمنٹ ہسپتال

15/12/41 - 12/12/41
15/12/41 - 12/12/41
15/12/41 - 12/12/41

5-4-1969

گورنمنٹ ہسپتال

گورنمنٹ ہسپتال ایچی ماہیت

گورنمنٹ ہسپتال

15/12/41 - 12/12/41
15/12/41 - 12/12/41
15/12/41 - 12/12/41

16-1-1966

گورنمنٹ ہسپتال

گورنمنٹ ہسپتال ایچی ماہیت

گورنمنٹ ہسپتال

15/12/41 - 12/12/41
15/12/41 - 12/12/41
15/12/41 - 12/12/41

3-3-1964

گورنمنٹ ہسپتال

گورنمنٹ ہسپتال ایچی ماہیت

گورنمنٹ ہسپتال

15/12/41 - 12/12/41
15/12/41 - 12/12/41
15/12/41 - 12/12/41

14-1-1966

گورنمنٹ ہسپتال

گورنمنٹ ہسپتال ایچی ماہیت

گورنمنٹ ہسپتال

15/12/41 - 12/12/41
15/12/41 - 12/12/41
15/12/41 - 12/12/41

14-1-1966

گورنمنٹ ہسپتال

گورنمنٹ ہسپتال ایچی ماہیت

گورنمنٹ ہسپتال

15/12/41 - 12/12/41
15/12/41 - 12/12/41
15/12/41 - 12/12/41

18-3-1963

گورنمنٹ ہسپتال

گورنمنٹ ہسپتال ایچی ماہیت

گورنمنٹ ہسپتال

15/12/41 - 12/12/41
15/12/41 - 12/12/41
15/12/41 - 12/12/41

11-5-1970

گورنمنٹ ہسپتال

گورنمنٹ ہسپتال ایچی ماہیت

گورنمنٹ ہسپتال



Correction of Services City

Appellate Board No. 13/2012

3403-SYAK/Pract

3403-SYAK/Pract

3403-SYAK/Pract

3403-SYAK/Pract

3403-SYAK/Pract

3403-SYAK/Pract

3403-SYAK/Pract

3403-SYAK/Pract

3403-SYAK/Pract

3403-SYAK/Pract

3403-SYAK/Pract

3403-SYAK/Pract

3403-SYAK/Pract

مدرسہ اسلامیہ دارالعلوم دیوبند

تاریخ

تاریخ

تاریخ

تاریخ

7755-60

17.3.2006

23.7.1996

2.4.1969

15.2.1970

28.3.2000

3.3.1968

3.2.2006

17.3.2006

28.7.1996

2.4.1969

15.2.1970

28.3.2000

3.3.1968

3.2.2006

17.3.2006

28.7.1996

2.4.1969

15.2.1970

28.3.2000

3.3.1968

3.2.2006

17.3.2006

28.7.1996

2.4.1969

15.2.1970

28.3.2000

3.3.1968

3.2.2006

17.3.2006

28.7.1996

2.4.1969

15.2.1970

28.3.2000

3.3.1968

3.2.2006

17.3.2006

28.7.1996

2.4.1969

15.2.1970

28.3.2000

3.3.1968

3.2.2006

17.3.2006

28.7.1996

2.4.1969

15.2.1970

28.3.2000

3.3.1968

3.2.2006

17.3.2006

28.7.1996

2.4.1969

15.2.1970

28.3.2000

3.3.1968

3.2.2006

17.3.2006

28.7.1996

2.4.1969

15.2.1970

28.3.2000

3.3.1968

3.2.2006

17.3.2006

28.7.1996

2.4.1969

15.2.1970

28.3.2000

3.3.1968

3.2.2006

17.3.2006

28.7.1996

2.4.1969

15.2.1970

28.3.2000

3.3.1968

3.2.2006

17.3.2006

28.7.1996

2.4.1969

15.2.1970

28.3.2000

3.3.1968

3.2.2006

17.3.2006

28.7.1996

2.4.1969

15.2.1970

28.3.2000

3.3.1968

3.2.2006

17.3.2006

28.7.1996

2.4.1969

15.2.1970

28.3.2000

3.3.1968

3.2.2006

17.3.2006

28.7.1996

2.4.1969

15.2.1970

28.3.2000

3.3.1968

3.2.2006

17.3.2006

28.7.1996

2.4.1969

15.2.1970

28.3.2000

3.3.1968

3.2.2006

17.3.2006

28.7.1996

2.4.1969

15.2.1970

28.3.2000

3.3.1968

3.2.2006

17.3.2006

28.7.1996

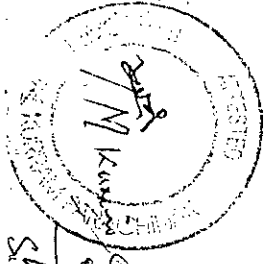
2.4.1969

15.2.1970

28.3.2000

3.3.1968

3.2.2006



Signature

16.5.2014

1.2.2006

3.5.1979

11.11.2006

7.2.1953

21.9.2006

6.2.1956

24.2.2014

1.2.2006

7.2.1953

1.2.2006

1.2.2006

1.2.2006

1.2.2006

1.2.2006

7.2.1953

21.9.2006

6.2.1956

6.2.1956

6.2.1956

21.9.2006

6.2.1956

6.2.1956

6.2.1956

6.2.1956

6.2.1956

6.2.1956

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWR

Service Appeal No 130/2018

Jannat Khan S/o Nadar Khan R/O Patwari Lower Sadda Kurram Agency Parachinar.

..... Appellant

Versus

1. Senior Member Board of Revenue (SMBR) Civil Secretariat, Peshawar
2. Director Board of SMBR, Civil Secretariat Peshawar.
3. Political Agent, Kurram Parachinar Kurram Agency.
4. Tehsildar Mahal Kurram, Tehsil & District Kurram Agency
5. Assistant Secretary Establishment Govt of KPK, Board of Revenue & Estate Deptt Peshawar
6. Muhammad Amin Khan S/O Baz Khan caste Lisyani R/O Mula Bagh Parachinar Kurram Agency.
7. Ashiq Ali S/O Ghulam Ali, Caste Bangash R/O Hassan Zai Zeran Parachinar Kurram Agency.
8. Alamgir S/O Sarwar Khan, caste Bangash Bushehra Parachinar Kurram Agency

..... Respondents.

Subject:- PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO.1 TO 5.

Respectfully Shewith

Preliminary Objections.

- 1- That the appellant has got no cause of action.
- 2- That the instant of appeal is not maintainable.
- 3- That the appellant has got no locus standi
- 4- That the appellant has not come to the court with clean hand

Reply of facts.

- 1- Pertains to record hence no comments.
- 2- His name was entered in the seniority list.
- 3- The appellant has passed the examination of Field Kanungo in the year 1999
- 4- Incorrect. The revised seniority list 2016 and seniority list 2017 was carefully maintained and accordingly The appellant was placed at serial No.03 Therefore the rest of the Patwaris comes junior to the appellant (seniority list attached as Annexure- A & B)
- 5- Correct. The revised seniority list was not provided to the appellant as desired by him
- 6- Correct. As per direction of Senior Member Board of Revenue KPK Peshawar, the revised seniority list 2016 was prepared and forward to Senior Member Board of Revenue KPK Peshawar vide this office letter No 554/PAK/Acctt dated 09.02.2018 (Copy enclosed)
- 7- Correct. The appropriate action was taken in shape of preparation of revised seniority list 2016
- 8- Correct
- 9- No order has yet been passed.

Grounds.

Correct. The seniority list was issued in the year, 2016. The appellant filed an appeal against the said seniority list in the court of Senior Member Board of Revenue & Estate Department Peshawar. The Senior Member Board of Revenue & Estate Department Peshawar directed this office to correct the seniority list as such this office prepared revised seniority list, 2016 (copy attached).

B. The appellant was placed at his own No. according to revised seniority list, 2016

C. Incorrect As explained at Para-A

D. As replied in Para above.

E. According to revised seniority list the appellant placed at Serial.No.03 he will be promoted on his turn

F. That the respondents seek permission to raise additional grounds at the time of arguments.

In view of the above the appellant has been given all rights regarding his entitlement and his claim at this stage is not tenable. It is requested that the appeal may be dismissed



Senior Member,
Govt. of KPK, Board of Revenue
& Estate Department, Peshawar.



Director,
Govt. of KPK, Board of Rev.
& Estate Deptt., Peshawar



Assistant Secretary (Estab.),
Govt. of KPK, Board of Rev.
& Estate Deptt., Peshawar.



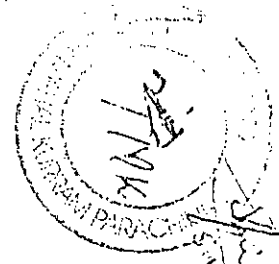
Deputy Commissioner
Kurram Tribal District

دانشگاه ملی پاکستان، کراچی

کتاب

تاریخ پاکستان

پروفیسر ایچ ایم کھن



*Report Regarding
circulation of Seminars
list*

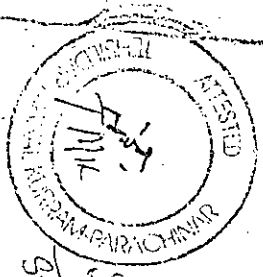
6-4-1998	15-12-1987	FA	6-2-1961	سردار	پروفیسر ایچ ایم کھن
6-4-1998	15-12-1987	FA	22-9-1965	پروفیسر	پروفیسر ایچ ایم کھن
6-4-1998	14-9-1988	FA	5-4-1969	پروفیسر	پروفیسر ایچ ایم کھن
6-4-1998	14-1-1990	FA	16-1-1966	پروفیسر	پروفیسر ایچ ایم کھن
6-4-1998	14-1-1990	BA	3-3-1964	پروفیسر	پروفیسر ایچ ایم کھن
6-4-1998	14-1-1990	FA	12-4-1966	پروفیسر	پروفیسر ایچ ایم کھن
6-4-1998	15-1-1990	FA	18-3-1963	پروفیسر	پروفیسر ایچ ایم کھن
6-4-1998	18-1-1992	FA	11-5-1960	پروفیسر	پروفیسر ایچ ایم کھن

A

3

بابت 6000 روپے کے طور پر 1000 روپے کی رقم کی گرانٹ

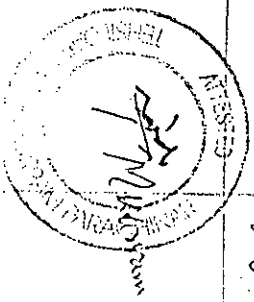
16-5-2014	1-2-2006	FA	9-5-1979	14	پولیس	پولیس	15
7-5-2013	1-2-2006	FA	7-2-1983	14	پولیس	پولیس	16
11-11-2004	21-9-2006	FA	6-2-1986	12	پولیس	پولیس	17
28-3-2000		BSC	20-3-1968	14	پولیس	پولیس	18
28-3-2000		BA	3-1-1973	13	پولیس	پولیس	19
28-3-2000		FA	5-3-1967	11	پولیس	پولیس	20
22-7-1996		MA	15-2-1970	10	پولیس	پولیس	21
22-7-1996		FA	9-4-1969	9	پولیس	پولیس	22
22-7-1996		FA	9-4-1969	9	پولیس	پولیس	23



9/1/90

دانشگاه تهران - دانشکده ادبیات و علوم انسانی - دانشکده ادبیات و علوم انسانی - دانشکده ادبیات و علوم انسانی

14	14.4.2008	FSC	7.4.1984	تجارت	مدرس	مدرس	مدرس	مدرس
19	15.7.2013	MA	22.3.1987	تجارت	مدرس	مدرس	مدرس	مدرس
20	24.7.2013	BA	30.4.1985	تجارت	مدرس	مدرس	مدرس	مدرس
21	5-3-2013	MA	13.9.1989	تجارت	مدرس	مدرس	مدرس	مدرس
22	24.6.2013	FA	6.3.1980	تجارت	مدرس	مدرس	مدرس	مدرس
23	10.11.2015	MA	20.3.1984	تجارت	مدرس	مدرس	مدرس	مدرس
24	28.6.2014	FSC/DIT	3-3-1987	تجارت	مدرس	مدرس	مدرس	مدرس



Shams
S. K. 1400

مجلس عالی تعلیم و تربیت

کتابخانه ملی افغانستان

کتابخانه ملی افغانستان

15/12/1948 - 15/12/1987 FA

کتابخانه ملی افغانستان

6.4.1998 - 15.12.1987 FA

3403-SPAK/Archi

6.4.1998 - 14-1-1990

6.4.1998 - 14-1-1990



6.4.1998 - 14-1-1990

6.4.1998 - 15-1-1990

6.4.1998 - 15-1-1990

کتابخانه ملی افغانستان

کتابخانه ملی افغانستان

کتابخانه ملی افغانستان

کتابخانه ملی افغانستان

کتابخانه ملی افغانستان

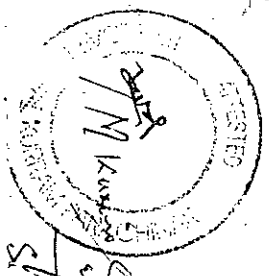
کتابخانه ملی افغانستان

کتابخانه ملی افغانستان

کتابخانه ملی افغانستان

کتابخانه ملی افغانستان

مدرسة الملك سعود بن عبدالعزيز
 الرياض - المملكة العربية السعودية
 رقم الملف: 7755-60
 تاريخ: 17-3-2006



Spina
 S1190

24.2.2014	1.2.2006	FA	7-2-1983	طالب	التاريخ: 15
16.5.2014	1.2.2006	FA	2-5-1979	طالب	التاريخ: 14
7.5.2013	11.11.2004	FA	26-5-1979	طالب	التاريخ: 13
25.3.2006	BA	3-1-1972	طالب	التاريخ: 12	
28.3.2006	BSC	20-3-1968	طالب	التاريخ: 11	
28.3.2006	FA	5-3-1967	طالب	التاريخ: 10	
28.7.1996	MA	15-2-1970	طالب	التاريخ: 9	
28.7.1996	FA	20.4.1969	طالب	التاريخ: 8	
28.7.1996	FA	20.4.1969	طالب	التاريخ: 7	
28.7.1996	FA	20.4.1969	طالب	التاريخ: 6	
28.7.1996	FA	20.4.1969	طالب	التاريخ: 5	
28.7.1996	FA	20.4.1969	طالب	التاريخ: 4	
28.7.1996	FA	20.4.1969	طالب	التاريخ: 3	
28.7.1996	FA	20.4.1969	طالب	التاريخ: 2	
28.7.1996	FA	20.4.1969	طالب	التاريخ: 1	

33
 2017
 10.11.2015
 24.6.2013
 5-3-2012
 15-7-2013
 21-7-2013

14.4.2008
 16.6.2010
 15.2.2011

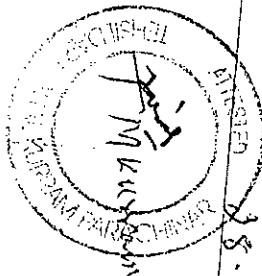
MA
 MA
 BA

29.3.1947
 30.4.1955
 13.2.1982

24.6.2013
 24.6.2014
 28.6.2013

FA
 FSC/DIT
 MA

6.3.1980
 3.3.1987
 20.3.1984



23
 24
 25
 26
 27
 28
 29
 30
 31
 32
 33
 34
 35
 36
 37
 38
 39
 40
 41
 42
 43
 44
 45
 46
 47
 48
 49
 50
 51
 52
 53
 54
 55
 56
 57
 58
 59
 60
 61
 62
 63
 64
 65
 66
 67
 68
 69
 70
 71
 72
 73
 74
 75
 76
 77
 78
 79
 80
 81
 82
 83
 84
 85
 86
 87
 88
 89
 90
 91
 92
 93
 94
 95
 96
 97
 98
 99
 100