

05th July, 2022

Appellant in person present. Mr. Kabir Ullah Khattak, Additional AG alongwith Zahid-ur-Rehman Superintendent for respondents present.

Official respondents as well as private respondents No.4 & 5 have not submitted written reply/comments. Representative of official respondents seeks time for submission of written reply/comments. Last chance is given to official respondents as well as to private respondents No.4 & 5 for submission of written reply/comments. To come up for written reply/comments on 07.09.2022 before S.B.




(Kalim Arshad Khan)
Chairman

23.05.2022

Appellant in person present. Mr. Kabirullah Khattak, Addl. AG alongwith Mr. Zahid-ur-Rehman Superintendent for official respondents present. None present on behalf of private respondents No. 4 & 5.

Written reply/comments on behalf official respondents as well as private respondents No. 4 & 5 not submitted. Representative of official respondents seeks time to submit written reply/comments. Previous date was changed on the strength of Reader note, therefore, notice be issued to the private respondents No. 4 & 5 for submission of written reply/comments. Adjourned. To come up for written reply/comments on 05.07.2022 before S.B.


(Mian Muhammad)
Member (E)

~~05th July, 2022~~

Appellant in person present. Mr. Kabir Ullah Khattak, Additional AG alongwith Zahid-ur-Rehman Superintendent for respondents present.

Info needs
Official respondents as well as private respondents No.4 & 5 have not submitted written reply/comments. Representative of official respondents seeks time for submission of written reply/comments. Last chance is given to official respondents as well as to private respondents No.4 & 5 for submission of written reply/comments. To come up for written reply/comments on 07.09.2022 before S.B.

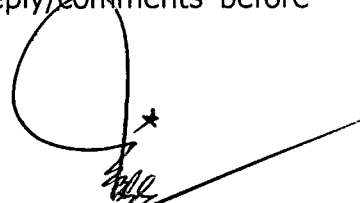
~~(Kalim Arshad Khan)
Chairman~~

17.01.2022

Learned counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant argued that the appellant is aggrieved of the office order dated 15.07.2021, whereby private respondents No. 4 & 5 were promoted from (BS-03) to the post of Junior Clerk (BS-11) while the appellant being senior to them was ignored despite the fact that the appellant stands at serial No. 26 of the seniority list of Class-IV employees as stood on 31st December 2020 while names of the private respondents No. 4 & 5 are reflected at serial 28 and 38 respectively. Having aggrieved with the said promotion order, the appellant preferred departmental appeal on 17.08.2021, but it was not responded to within the statutory period hence instant service appeal was filed in the service Tribunal on 02.12.2021.

The appeal is admitted to regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within ten (10) days. Thereafter notice be issued to the respondents for submission of reply/comments. To come up for reply/comments before the S.B on 03/03/2022.


(Mian Muhammad)
Member (E)

3-3-22

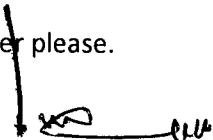
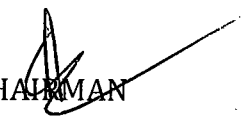
Due to retirement of the Hon'ble
Chairman the case is adjourned to
come up for the same as before
on 23/5/2021
@
Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7821 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/12/2021	<p>The appeal of Mr. Shoaib-ur-Rehman presented today by Mr. Muhammad Arif Jan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>17/01/22</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. 7821/2021

Shoaib ur Rahman..... Appellant

VERSUS

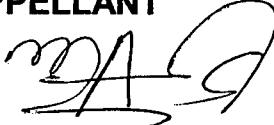
Secretary Board of revenue & others..... Respondents

INDEX

S.No	Description of Documents	Annex	Pages
1.	Grounds of Appeal with affidavit		1-4
2.	Stay application		5
3.	Affidavit		6
4.	Addresses of parties		7
5.	Copy of appointment order	A	8
6.	Copy of appreciation certificate	B	9
7.	Copy of final seniority list	C	10-15
8.	Copy of office order dated 15-7-2021 <i>with Belled copy</i>	D	16-17
9.	Copies of Certificates.	E	18-19
10.	Copy of Departmental Appeal	F	20
11.	Wakalat Nama		21

APPELLANT

Through



Muhammad Arif Jan

Advocate Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. _____/2021

Shoaib ur Rahman Chowkidar BPS-3 Deputy Commissioner Office
Nowshera..... Appellant

VERSUS

1. Secretary Board of Revenue, Khyber Pakhtunkhwa, Peshawar.
 2. Commissioner, Peshawar Division Peshawar.
 3. Deputy Commissioner, Nowshera.
 4. Mr.Haroon Shah Junior Clerk Deputy Commissioner, Nowshera.
 5. Noor ul Haq Junior Clerk Deputy Commissioner, Nowshera.
- Respondents

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED OFFICE ORDER BEARING NO-5451-55 DATED 15-07-2021 UPTO THE EXTENT OF RESPONDENTS NO 4 & 5 VIDE WHICH RESPONDENTS NO-4 & 5 JUNIOR MOST THEN THE APPELLANT HAVE BEEN PROMOTED TO THE POST OF JUNIOR CLERK BY RESPONDENT NO-3 AGAINST WHICH DEPARTMENTAL APPEAL HAS BEEN PREFFERED BEFORE RESPONDENT NO-2 ON 17-08-2021 BUT THE SAME HAS NOT BEEN DISPOSED OF WITHIN THE PRESCRIBED STATUTORY PERIOD.

Respectfully Sheweth:

1. That the appellant was appointed under deceased son's quota as Chowkidar (BPS-3) in the office of respondent No-3 vide office order dated 26-03-2014. (Copy of appointment order is attached as ANNEX-A).
2. That the appellant is performing his duties honestly, to the best of his abilities and up to the entire satisfaction of his superiors. (Copy of appreciation certificate is attached as ANNEX-B).

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3. That Respondent No-3 maintained the final seniority list of Class-IV employees for the year, 2020 where in the appellant is rightly been placed at S.No-26 and the respondents No-4 & 5 have been shown at S.No-28 and 38 respectively. (Copy of Final Seniority list is attached as ANNEX-C).
4. That on the basis of above final seniority list, DPC was held and respondents No-4 and 5 being junior most then the appellant were promoted to the post of Junior Clerk BPS-11 vide impugned office order dated 15-07-2021 and deprived the appellant from his vested right of promotion. (Copy of Office Order dated 15-07-2021 is attached as ANNEX-D).
5. That soon after getting knowledge of the impugned office order, the appellant approached to respondent No-3 but the appellant was replied with the innocent excuse of missing of the entry in the record pertain to the qualification gained by the appellant. It is worth mentioned here that the appellant is equipped with the qualification of Intermediate into his credit since 2016 and all the documents have been submitted well within time before the concerns. (Copy of certificates are attached as ANNEX-E).
6. That the is strong believer of the supremacy of law, thus filed departmental appeal before respondent No-2 but the same has not been decided within stipulated period of time. (Copy of D/appeal is attached as ANNEX-F).
7. That the appellant being aggrieved from the action and inaction of Respondents by way of depriving/ignoring the appellant from his lawful right of promotion to the post of Junior Clerk being senior most in the seniority list is against the Law, facts and principles of natural justice on grounds inter alia as follows:

GROUND:

- A. Because the actions and inactions of the Respondents by way of depriving the appellant from his legal and lawful right of promotion to the post of Junior Clerk being qualified, eligible and entitled in all respect and junior most than the appellant were promoted vide impugned office order dated 15-07-2021 passed by respondent No-3 (Herein after impugned up to the extent of Respondents No-4 & 5) is patently illegal, unlawful, without lawful authority, of no legal effect and ineffective upon

3

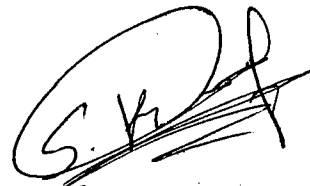
the rights of appellant, hence the respondents be directed to act in accordance with Law and to withdraw the impugned office order upto the extent of Respondents No-4 & 5 and further issue promotion order to the appellant being qualified, entitled and eligible for the post of Junior Clerk without any further delay, reason and justification.

- B. Because the appellant did passed intermediate examination and also submitted the documents before the concerned within time but even then, the appellant have been ignored and deprived from promotion which is wrong and invites the consideration of this Hon'ble Tribunal.
- C. Because the respondents themselves violated their own guidelines and directive of high ups on the subject matter, hence intentionally adopted the policy of "pick and choose" thus this act of the respondents is against the existing laws and policies.
- D. Because the respondents No- 4 and 5 are figured junior most then the appellant in the seniority list maintained but even then falsely been promoted thus this act of the respondents is amounts to abuse of law.
- E. That any other ground which has not been mentioned may also be permitted to rise at the time of hearing.

It is therefore respectfully submitted that on acceptance of the instant Appeal,

- 1. This Hon'ble Tribunal may graciously be please to declare the impugned office order dated 15-07-2021 as illegal, unlawful and to be set aside up-to the extent of respondents No-4 and 5.**
- 2. Direct the respondent No-3 to issue promotion order of the appellant to the post of Junior Clerk being qualified, entitled and eligible in all respect without any further delay, reason and justification.**
- 3. Any other relief which this Hon'ble Tribunal deems fit under the facts and circumstances of the case may also be awarded in favor of appellant.**

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APPELLANT

Through

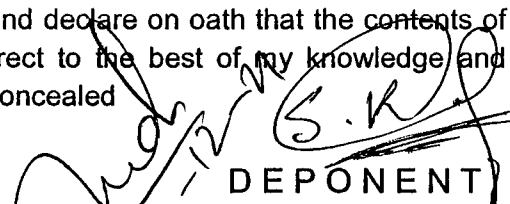


Muhammad Arif Jan

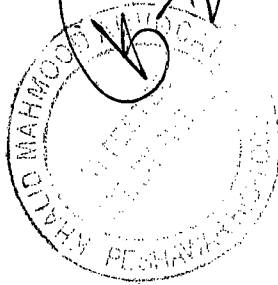
Advocate Peshawar

AFFIDAVIT

I do hereby solemnly affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing has been concealed



DEPONENT



5

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

Service Appeal No. _____/2021

Shoaib ur Rahman..... Appellant

VERSUS

Secretary Board of revenue & others..... Respondents

**APPLICATION FOR SUSPENSION OF OPERATION OF THE
IMPUGNED OFFICE ORDER DATED 15-7-2021 UPTO THE EXTENT
OF RESPONDENTS NO-4 AND 5 TILL FINAL DISPOSAL OF
TITLED APPEAL.**

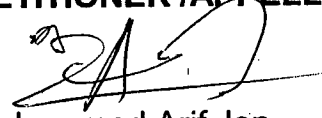
Respectfully Sheweth;

1. That the above titled appeal is being filed to day which is yet to be fixed for hearing.
2. That the facts and grounds taken in the body of main appeal may kindly be treated as integral part of this application which making out an excellent prima facie case in favor of the appellant/applicant against the respondents.
3. That all the three ingredients like strong prima facie case, balance of convenience and irreparable losses are in favor of the appellant.

It is, therefore, humbly submitted that the application may graciously be allowed in the interest of Justice.

PETITIONER /APPELLANT

Through



Muhammad Arif Jan

Advocate Peshawar

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. _____/2021

Shoaib ur Rahman..... Appellant

VERSUS

Secretary Board of revenue & others..... Respondents

AFFIDAVIT

I, Shoaib ur Rahman Chowkidar BPS-3 Deputy Commissioner Office Nowshera do hereby solemnly affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing has been concealed.

S. K. A.
DEPONENT



7

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. _____/2021

Shoaib ur Rahman..... Appellant

VERSUS

Secretary Board of revenue & others..... Respondents

ADDRESSES OF THE PARTIES

APPELLANT

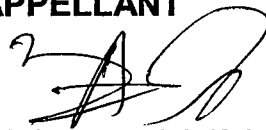
Shoaib ur Rahman Chowkidar BPS-3 Deputy Commissioner Office
Nowshera

RESPONDENTS

1. Secretary Board of Revenue, Khyber Pakhtunkhwa, Peshawar.
2. Commissioner, Peshawar Division Peshawar.
3. Deputy Commissioner, Nowshera.
4. Mr.Haroon Shah Junior Clerk Deputy Commissioner, Nowshera.
5. Noor ul Haq Junior Clerk Deputy Commissioner, Nowshera.

Through

APPELLANT



Muhammad Arif Jan

Advocate Peshawar



Office of the
Deputy Commissioner
Nowshera

(Office Phone#0923-9220099, Fax#0923-92200159, Email: dconsrpk@yahoo.com)

26 March, 2014

OFFICE ORDER

No. 1286-93 /04/DC/EA/NSR/2014. In pursuance to the section officer Estt:-IV, Establishment & Administration Department, Government of NWFP now Khyber Pakhtunkhwa, Peshawar letter No.SO Estt: VI(E&AD)/3-I/2005 dated 02-5-2006. Mr. Shoalb-ur-Rehman s/o Zulfiqar-ur-Rehman, resident of village Balu Tehsil Pabli, District Nowshera is hereby appointed as Chowkidar (BPS-01) on contract basis under 100% deesed class-iv children's quota in this office with immediate effect on the following terms and conditions:-

11. He will be governed by the all rules regulations applicable to the Government employees.
12. He will be initially, on probation period for one year.
13. His employment in this office shall be purely temporary and his services is liable to be terminated without assigning any reason at 30 days notice or on the payment of 30 days salary in lieu thereof.
14. In case he wishes to resign from service. He will have to serve notice or 30 days pay shall be forfeited in lieu thereof.
15. He will have to produce a Medical Certificate of fitness from Medical Superintendent, DHQ Hospital, Nowshera before reporting for duty as required under the rules.

Deputy Commissioner,
Nowshera.

Copy forwarded to the:-

- 17- The Commissioner, Peshawar Division, Peshawar.
- 18- The Secretary Board of Revenue, Khyber Pakhtunkhwa, Peshawar.
- 19- The Assistant Commissioner, Nowshera.
- 20- The Senior District Accounts Officer, Nowshera.
- 21- The Medical Superintendent DHQ Hospital Nowshera.
- 22- The Accounts Officer DC Office Nowshera.
- 23- The Superintendent DC Office Nowshera.
- 24- Mr. Shoalb-ur-Rehman s/o Zulfiqar-ur-Rehman, resident of village Balu Tehsil Pabli, District Nowshera with direction that if the above terms and conditions are acceptable to you, you should submit your arrival report for duty in the office of the undersigned within 14 days of the issuance of this order, otherwise, this order shall stand cancelled.

Deputy Commissioner,
Nowshera.

CTC

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Amul-B



**Office of the Assistant Commissioner
Nowshera**

(Office Phone # 0923-9220104 Fax # 0923-9220220)

Shoaib ur Rehman

AC Office Nowshera.

Subject:- **APPRECIATION LETTER.**

Your valuable assistance and hectic efforts during my tenure were tremendous. You worked in odd hours to accomplish tasks assigned to District Administration, which deserve appreciation.

Wish you stay diligent and successful in future.

**(Akhtar Nawaz)
Assistant Commissioner
Nowshera**

ccc

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Annex-2

DEPUTY COMMISSIONER OFFICE NOWSHERA:
FINAL JOINT SENIORITY LIST OF CLASS-IV (BPS-03) (NAIB QASIDS, CHOWKIDARS, DAAK RUNNERS, RECORD LIFTERS, BEHISHTIS, MALIS AND SWEEPERS)

Total Sanctioned Post of Class-IV=118
AS STOOD ON 31st DECEMBER 2020.

S.No	Name & Designation	Date of Birth	District of Domicile	Qualification	Date of		Method of Recruitment	Date of Retirement	Remarks
					1 st Entry into Govt: Service	Appointment / Promotion to the present post			
1.	Murad Ali Naib Qasid	01.07.1963	Nowshera		01.07.1983	01.07.1983	Initial	30-6-2023	
2.	Muhammad Abid Naseem Naib Qasid	12-2-1969	Nowshera		14-07-1987	14-07-1987	Initial	11-2-2029	
3.	Ibrar Ullah Naib Qasid	02.01.1968	Nowshera		17.08.1987	17.08.1987	Initial	1-1-2028	
4.	Nadir Ali Naib Qasid	1-7-1970	Nowshera		7-4-1990 as Chowkidar	01-07-1990 as Naib Qasid	Change of Cadre	30-6-2030	
5.	Shah Saud Naib Qasid	1966	Nowshera		1-7-1990	1-7-1990	Initial	2026	
6.	Niamat Ali Naib Qasid	30-1-1972	Nowshera		2-2-1991	2-2-1991	Initial	29-1-2032	
7.	Muhammad Shahid Naib Qasid	5-11-1967	Nowshera		1-6-1991	1-6-1991	Initial	4-11-2027	
8.	Arif Khan Naib Qasid	1-1-1968	Nowshera	5 th Class	3-9-1991	3-9-1991	Initial	31-12-2027	
9.	Sakhawat Shah Naib Qasid	4-1-1965	Nowshera		1-3-1993	1-3-1993	Initial	3-1-2025	
10.	Qasim Jan Naib Qasid	1-1-1971	Nowshera		5-6-1993	5-6-1993	Initial	31-12-2030	
11.	Gul Nawaz Khan Naib Qasid	23-7-1972	Nowshera		1-9-1993	1-9-1993	Initial	22-7-2032	
12.	Pervaiz Khan Chowkidar	19-10-1973	Nowshera		01-04-1994	01-04-1994	By Initial	18-10-2033	
13.	Fazl-e-Mukhtaj Naib Qasid	18-04-1972	Nowshera		22-03-1995	22-03-1995	Initial	17-04-2032	
14.	Feroz ud Din Naib Qasid	1967	Nowshera		28-7-2003 as Chowkidar	16-06-2010 as Naib Qasid	Change of Cadre	2027	
15.	Ashraf Maseh Sweeper	1975	Nowshera		11-10-2003	11-10-2003	By initial	2035	
16.	Arif Maseh Sweeper	1982	Nowshera		08-11-2003	08-11-2003	By initial	2042	
17.	Abid Hussain Chowkidar	1973	Nowshera		15-04-2008	15-04-2008	By Initial	2033	
18.	Aziz Ur Rehman N/Qasid	4-1-1971	Nowshera		15-4-2011	15-4-2011	Initial	3-1-2031	

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CPC
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11

S.No	Name & Designation	Date of Birth	District of Domicile	Qualification	Date of		Method of Recruitment	Date of Retirement	Remarks
					1 st Entry Into Govt: Service	Appointment / Promotion to the present post			
19.	Shahab Khan Naib Qasid	1-2-1986	Nowshera	8 th	3-11-2011	3-11-2011	Initial	31-1-2046	
20.	Mujahid Hussain Naib Qasid	1-1-1971	Nowshera	SSC	26-3-2012	26-3-2012	Initial	31-12-2030	
21.	Muhammad Usman Chowkidar	02-04-1993	Nowshera	F.A	26-03-2012	26-03-2012	By Initial	01-04-2053	
22.	Waheed Akbar Chowkidar	01-02-1979	Nowshera		08-11-2013	08-11-2013	By Initial	31-01-2039	
23.	Bahadar Ali Naib Qasid	2-09-1995	Nowshera		15-1-2014	15-1-2014	Initial	1-9-2055	
24.	Falak Niaz Chowkidar	1976	Nowshera	8 th	27-03-2014	27-03-2014	By Initial	2036	
25.	Nisar Khan Chowkidar	01-01-1986	Nowshera	8 th	27-03-2014	27-03-2014	By Initial	31-12-2046	
26.	Shahid Rehman Chowkidar	06-08-1994	Nowshera		27-03-2014	27-03-2014	By Initial	05-08-2054	
27.	Rafaqat Ali Naib Qasid	1984	Nowshera	5 th	28-03-2014 as Chowkidar	17-09-2014 as Naib Qasid	Change of Cadre	2044	
x 28.	Haroon Shah Naib Qasid	14-01-1979	Nowshera		14-04-2014	14-04-2014	Initial	13-01-2039	
29.	Akhtar Ali Chowkidar	01-01-1989	Nowshera		14-04-2014	14-04-2014	By Initial	31-12-2049	
30.	Rawail Khan Chowkidar	12-03-1984	Nowshera		15-04-2014	15-04-2014	By Initial	11-03-2044	
31.	Naeem Maseh Sweeper	01-01-1989	Nowshera		15-04-2014	15-04-2014	By initial	31-12-2048	
32.	Saqib Narish Sweeper	01-01-1989	Nowshera		15-04-2014	15-04-2014	By initial	31-12-2048	
33.	Khalid Naeem Chowkidar	01-02-1992	Nowshera		15-04-2014	15-04-2014	By Initial	31-01-2052	
34.	Muhammad Tahir Daak Runner	1973	Nowshera		18-04-2014	18-04-2014	By initial	2033	
35.	Said Muhammad Daak Runner	01-01-1975	Nowshera		22-04-2014	22-04-2014	By initial	31-12-2034	
36.	Muhammad Ayaz Daak Runner	02-03-1982	Nowshera		22-04-2014	22-04-2014	By initial	01-03-2042	
37.	Muhammad Asif Daak Runner	14-07-1986	Nowshera		22-04-2014	22-04-2014	By initial	13-07-2046	
x 38.	Noor Ul Haq Naib Qasid	16-02-1979	Nowshera	SSC	06-05-2014	06-05-2014	Initial	15-02-2039	

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S.No	Name & Designation	Date of Birth	District of Domicile	Qualification	Date of		Method of Recruitment	Date of Retirement	Remarks
					1 st Entry into Govt: Service	Appointment / Promotion to the present post			
39.	Muhammad Zafar Daak Runner	05-01-1982	Nowshera	SSC	06-05-2014	06-05-2014	By Initial	04-01-2042	
40.	Man Nawaz Daak Runner	12-02-1983	Nowshera	SSC	06-05-2014	06-05-2014	By initial	11-02-2043	
41.	Zafar Ul Islam Naib Qasid	10-08-1984	Nowshera	SSC	06-05-2014	06-05-2014	Initial	09-08-2044	
42.	Tauseef Ahmad Naib Qasid	16-04-1989	Nowshera	SSC	06-05-2014	06-05-2014	Initial	15-04-2049	
43.	Sajjad Khan Naib Qasid	01-05-1993	Nowshera	SSC	06-05-2014	06-05-2014	Initial	30-04-2053	
44.	Ahmad Saeed khan Daak Runner	25-03-1995	Nowshera		06-05-2014	06-05-2014	By initial	24-03-2055	
45.	Muhammad Rameez Daak Runner	03-04-1995	Nowshera		06-05-2014	06-05-2014	By initial	02-04-2055	
46.	Niaz Ali Naib Qasid	1973	Nowshera		12-05-2014	12-05-2014	Initial	2033	
47.	Muhammad Bilal Chowkidar	10-02-1988	Nowshera		22-05-2014	22-05-2014	By Initial	09-02-2048	
48.	Nazim Asad Chowkidar	03-04-1980	Nowshera		23-05-2014	23-05-2014	By Initial	02-04-2040	
49.	Said Qayyum N/Qasid	01-02-1981	Nowshera	SSC	26-05-2014	26-05-2014	Initial	31-01-2041	
50.	Irfan Amin Chowkidar	12-06-1982	Nowshera		26-05-2014	26-05-2014	By Initial	11-06-2042	
51.	Waqar Ali Shah Chowkidar	15-09-1982	Nowshera		26-05-2014	26-05-2014	By Initial	14-09-2042	
52.	Shoaib Khan Naib Qasid	04-04-1983	Nowshera	SSC	26-05-2014	26-05-2014	Initial	03-04-2043	
53.	Fazil Khan Naib Qasid	10-04-1984	Nowshera	SSC	26-05-2014	26-05-2014	Initial	09-04-2044	
54.	Jani Sweeper	01-01-1985	Nowshera		26-05-2014	26-05-2014	By Initial	31-12-2044	
55.	Anwar Khan Daak Runner	15-02-1986	Nowshera	SSC	26-05-2014	26-05-2014	By initial	14-02-2046	
56.	Mumtaz Akbar Mali	01-01-1988	Nowshera		26-05-2014	26-05-2014	By initial	31-12-2047	
57.	Ismail Sweeper	01-01-1988	Nowshera		26-05-2014	26-05-2014	By Initial	31-12-2047	
58.	Suleman Gul Naib Qasid	09-01-1989	Nowshera	SSC	26-05-2014 as Chowkidar	11-05-2015 as Naib Qasid	Change of Cadre	08-01-2049	
59.	Ibrahim Mali	01-02-1989	Nowshera		26-05-2014	26-05-2014	By initial	31-01-2049	
60.	Mujeeb Ur Rehman Naib Qasid	11-02-1989	Nowshera	SSC	26-05-2014	26-05-2014	Initial	10-02-2049	

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S/No	Name & Designation	Date of Birth	District of Domicile	Qualification	Date of		Method of Recruitment	Date of Retirement	Remarks
					1 st Entry into Govt: Service	Appointment / Promotion to the present post			
61.	Razi Khan Naib Qasid	30-04-1989	Nowshera	SSC	26-05-2014	26-05-2014	Initial	29-04-2049	
62.	Sami Ullah Naib Qasid	25-08-1989	Nowshera	SSC	26-05-2014	26-05-2014	Initial	24-08-2049	
63.	Qaisar Hayat Chowkidar	22-04-1990	Nowshera		26-05-2014	26-05-2014	By Initial	21-04-2050	
64.	Gul Zar Khan Daak Runner	05-03-1992	Nowshera		26-05-2014	26-05-2014	By initial	04-03-2052	
65.	Kamal Shah Chowkidar	01-01-1993	Nowshera		26-05-2014	26-05-2014	By Initial	31-12-2053	
66.	Saleem khan Daak Runner	04-04-1994	Nowshera	F.A	26-05-2014	26-05-2014	By Initial	03-04-2054	
67.	Akmal Badshah Chowkidar	03-05-1995	Nowshera		26-05-2014	26-05-2014	By Initial	02-05-2055	
68.	Hazrat Ali Chowkidar	05-07-1979	Nowshera		27-05-2014	27-05-2014	By Initial	04-07-2039	
69.	Aman Ullah Chowkidar	03-06-1974	Nowshera		28-05-2014	28-05-2014	By Initial	02-06-2034	
70.	Naik Amal Shah Daak Runner	18-03-1989	Nowshera	SSC	29-05-2014	29-05-2014	By initial	17-03-2049	
71.	Sardar Malook Daak Runner	13-11-1975	Nowshera		02-06-2014	02-06-2014	By initial	12-11-2035	
72.	Siraj Ud Din Chowkidar	03-04-1979	Nowshera		05-06-2014	05-06-2014	By Initial	02-04-2039	
73.	Zaheer Uddin Chowkidar	20-06-1976	Nowshera		10-06-2014	10-06-2014	By Initial	19-06-2036	
74.	Bahar Ali Naib Qasid	07-02-1983	Nowshera		10-06-2014 as Chowkidar	29-03-2017 as Naib Qasid	Initial	06-02-2043	
75.	Said Jan Shah Record Lifter	20-09-1987	Nowshera	SSC	10-06-2014	10-06-2014	By initial	19-09-2047	
76.	Adnan Naib Qasid	19-03-1995	Nowshera	9 th	10-06-2014	10-06-2014	Initial	18-03-2055	
77.	Imran Hidayat Sweeper	12-12-1986	Nowshera		13-06-2014	13-06-2014	By initial	11-12-2046	
78.	Mahboob Hussain Daak Runner	1986	Nowshera		18-06-2014	18-06-2014	By initial	2046	
79.	Rahim Gul Chowkidar	04-04-1982	Nowshera		19-06-2014	19-06-2014	By Initial	03-04-2042	
80.	Ahmad Ali Record Lifter	14-08-1988	Nowshera	SSC	20-06-2014	20-06-2014	By initial	13-08-2048	
81.	Gul Ali Naib Qasid	25-02-1993	Nowshera	F.A	20-06-2014	20-06-2014	Initial	24-02-2053	
82.	Khawar Bhatti Sweeper	02-05-1983	Nowshera		30-06-2014	30-06-2014	Initial	01-05-2043	
83.	Imtiaz Khan Chowkidar	1975	Nowshera		29-09-2014	29-09-2014	By Initial	2035	
84.	Ibrar Ul Amin Chowkidar	01-01-1989	Nowshera		29-09-2014	29-09-2014	By Initial	31-12-2048	
85.	Hazrat Bilal Chowkidar	10-04-1989	Nowshera		29-09-2014	29-09-2014	By Initial	09-04-2049	


[Handwritten signatures and marks]


14


S.No	Name & Designation	Date of Birth	District of Domicile	Qualification	Date of		Method of Recruitment	Date of Retirement	Remarks
					1 st Entry into Govt: Service	Appointment / Promotion to the present post			
86.	Zahir Muhammad Naib Qasid	10-03-1991	Nowshera	SSC	30-09-2014	30-09-2014	Initial	09-03-2051	
87.	Shabir Khan Chowkidar	1973	Nowshera		09-10-2014	09-10-2014	By Initial	2033	
88.	Shabir Gul Naib Qasid	10-04-1994	Nowshera		05-11-2014	05-11-2014	Initial	09-04-2054	
89.	Junaid Khan Naib Qasid	14-07-1978	Nowshera	SSC	27-01-2015	27-01-2015	Initial	13-07-2038	
90.	Samsoon Iqbal Sweeper	05-04-1981	Nowshera		27-01-2015	27-01-2015	By initial	04-04-2041	
91.	Khizran Khan Naib Qasid	17-01-1987	Nowshera	SSC	27-01-2015	27-01-2015	Initial	16-01-2047	
92.	Usman Khan Naib Qasid	31-12-1994	Nowshera	FSC	11-08-2015	11-08-2015	Initial	30-12-2054	
93.	Shahid Hussain Chowkidar	1973	Nowshera		24-08-2015	24-08-2015	By Initial	2033	
94.	Faisal	10-04-1997	Nowshera	SSC	31-08-2015	31-08-2015	Initial	09-04-2057	
95.	Akhtar Ali shah Behishti	15-03-1980	Nowshera	F.A	25-11-2015	25-11-2015	By initial	14-03-2040	
96.	Abdullah Chowkidar	01-01-1988	Nowshera		25-11-2015	25-11-2015	Initial	31-12-2047	
97.	Khan Zaib Naib Qasid	08-04-1991	Nowshera	SSC	25-11-2015	25-11-2015	Initial	07-04-2051	
98.	Muhammad Shoaib Alam Naib Qasid	21-04-1993	Nowshera	SSC	25-11-2015	25-11-2015	Initial	20-04-2053	
99.	Sohaib Khan Daak Runner	30-05-1994	Nowshera		09-12-2015	09-12-2015	By initial	29-05-2054	
100.	Fakhre Alam Naib Qasid	20-06-1985	Nowshera		09-01-2016	09-01-2016	Initial	19-06-2045	
101.	Iswaq Naib Qasid	25-02-1992	Nowshera		24-02-2016	24-02-2016	Initial	24-02-2052	
102.	Hassan Khan Sweeper	19-04-1988	Nowshera		19-05-2016	19-05-2016	By initial	18-04-2048	
103.	Muhammad Saqib Sweeper	15-04-1995	Nowshera		19-05-2016	19-05-2016	By initial	14-04-2055	
104.	Akbar Gul Chowkidar	27-12-1983	Nowshera		15-07-2016	15-07-2016	By Initial	26-12-2043	
105.	Nizam Ud Din Behishti	02-01-1981	Nowshera		23-09-2016	23-09-2016	By Initial	01-01-2041	
106.	Imran Khan Chowkidar	03-08-1981	Nowshera		23-09-2016	23-09-2016	By Initial	02-08-2041	
107.	Tahir Gul Chowkidar	12-04-1993	Nowshera	SSC	23-09-2016	23-09-2016	By Initial	11-04-2053	
108.	Naeem Ur Rehman Sweeper	21-11-1981	Nowshera		27-09-2016	27-09-2016	By Initial	20-11-2041	
109.	Liaqat Ali Naib Qasid	24-04-1987	Nowshera	F.A	27-09-2016	27-09-2016	Initial	23-04-2047	
110.	Muhammad Nabi N/Qasid	24-03-1996	Nowshera	SSC	27-09-2016	27-09-2016	Initial	23-03-2056	
111.	Babar Khan Sweeper	20-04-1996	Nowshera		27-09-2016	27-09-2016	By initial	19-04-2056	

15

Sl. No.	Name & Designation	Date of Birth	District of Domicile	Qualification	Date of		Method of Recruitment	Date of Retirement	Remarks
					1 st Entry into Govt: Service	Appointment / Promotion to the present post			
112	Kamran Mali	1977							
113	Atteq Ur Rehman Naib Qasid	14-03-1999	Nowshera		06-03-2017	06-03-2017	Initial	2037	
			Nowshera	FSC	14-07-2017	14-07-2017	Initial	13-03-2059	
114	Noor Bahadar Chowkidar	01-01-1998	Nowshera						
115	Aurangzeb Chowkidar	02-11-1983	Nowshera		28-07-2017	28-07-2017	By initial	31-12-2057	
116	Wajid Ullah Sweeper	14-01-1980	Nowshera		03-05-2019	03-05-2019	By initial	01-11-2043	
117	Anwar Ali Sweeper	04-08-1988	Nowshera	FA	06-05-2019	06-05-2019	By initial	13-01-2040	
					06-05-2019	06-05-2019	By initial	03-08-2048	


Deputy Commissioner
Nowshera.



CTC




16 Annex-D
OFFICE OF THE
DEPUTY COMMISSIONER
NOWSHERA

Email: dconowshera@...
Ph: # 0923- 9220098
Fax #: /923- 9220159

NO. DC (New Est. Promotion/ 5451-55
Dated: 15.07.2021.

OFFICE ORDER

On the recommendation of the Departmental Promotion Committee in its meeting held on 14.07.2021, the following Class-IV employees (BPS-03) of this office are hereby promoted to the vacant posts of Junior Clerk (BPS-11) with immediate effect.

1. Mu. Iqbal Hussain S/O Musharaf Shah.
2. Muhammad Usman S/O Sardaraz Khan.
3. Haseeb Shah S/O Humayun Shah.
4. Nadeem Khan S/O Zar Muhammad.

[Signature]
DEPUTY COMMISSIONER,
NOWSHERA.

This is Even No. & date:

1. District Accounts Officer, Nowshera.
2. PS to Commissioner, Peshawar Division, Peshawar.
3. Accounts Officer, DC Office Nowshera.
4. Accountant, DC Office, Nowshera.
5. Officials concerned.

[Signature]
DEPUTY COMMISSIONER,
NOWSHERA.

[Handwritten mark]

[Handwritten mark]

17

BETTER COPY

**OFFICE OF THE
DEPUTY COMMISSIONER
NOWSHERA**

NO.DC(Nsr(Estt/Promotion/ 5451-55

Dated 15.07.2021

OFFICE ORDER

On the recommendation of the Departmental Promotion Committee in the meeting held on 14.07.2021, the following Class-IV employees (BPS-03) of this office are hereby promoted to the vacant posts of Junior Clerk (BPS-11) with immediate effect.

1. Mujadhi Hussain S/o Musharaf Shah
2. Muhammad Usman S/o Sardaraz Khan
3. Haroon Shah S/o Humayun Shah
4. Noor ul Haq S/o Zar Muahmmad

Sd/-
Deputy Commissioner
Noswhera.

Endst: Even No & Date

Copy for information and necessary action to the:-

1. District Accounts Officer, Nowshera
2. PS to Commissioner, Peshawar Division, Peshawar
3. Accounts Officer, DC Office Nowshera
4. Accountant, DC Office, Nowshera
5. Officials concerned.

CFC
B

Sd/-
Deputy Commissioner
Noswhera.

Roll No. 77170

Reg_No:
210977-B/PVT-2015

Group:
HUMANITIES

Ayaz
Ayaz Ali Shah
INSPECTOR
Intelligence Bureau

18 *Ames-E*
Board of Intermediate and Secondary Education
Mardan
Khyber Pakhtunkhwa Pakistan

Serial No. 396079



Higher Secondary School Certificate Examination, Annual 2016

This is to certify that SHOAIB UR RAHMAN Son of ZULFIQAR UR RAHMAN
and resident of NEWSHERA
has passed the Higher Secondary School Certificate Examination of the Board of Intermediate and Secondary
Education, Mardan, held in April/May, 2016 as a Private Candidate.
He obtained 517 Marks out of 1100 and has been placed in Grade D Representing Fair.

REVISED

Issued as Revised in lieu of Certificate S.No.265723.

[Signature]

[Signature]
Asstt. Secretary

[Signature]

[Signature]
Secretary



This certificate is issued without alteration or erasure.

Roll No. 109867

Group. Science

Board of Intermediate and Secondary Education
Mardan
Khyber Pakhtunkhwa Pakistan

Serial No. 734279

REVISED



Abled

(Signature)

Ayaz Ali Shah
INSPECTOR
of Technical Bureau

Secondary School Certificate Examination
SESSION ANNUAL - 2014

This is to certify that SHOAIB UR RAHMAN Son of ZULFIQAR UR RAHMAN
and student of GOVT. HIGH SCHOOL NO. 1 NOWSHERA CANTT has passed the Secondary School

Certificate Examination of the Board of Intermediate & Secondary Education Mardan, held in March / April 2014 as a Regular candidate.

He obtained 523 marks out of 1100 and has been placed in Grade D representing Fair. The candidate passed the following subjects:

1. English 2. Urdu 3. Islamiyat (Comp) 4. Pakistan Studies 5. Mathematics 6. Physics 7. Chemistry 8. Biology

His date of birth according to admission form is (in Figures) 06-08-1994 (in Words) 06th August, N/H Ninety-Four

Issued as Revised in lieu of Certificate bearing S.No.425768.

(Signature)
Asstt. Secretary

This certificate is issued without alteration or erasure.

(Signature)

(Signature)
Secretary



20

Annex - F

To

The Commissioner,
Peshawar Division Peshawar.

Subject: - DEPARTMENTAL APPEAL.

R/Sir,

In it is humbly submitted that the worthy Deputy Commissioner Nowshera vide office order No. DC(Nsr) Estt:/Promotion/5451-55, dated 15/07/2021, promoted 04 class-IV were promoted to the post of Junior Clerk (BPS-11).

Apropos, I have the following reservations:

1. I was appointed as Chowkidar (BPS-03) through deceased son quota on 27-03-2014.
2. I was placed in the seniority list at S. No. 26 for the year 2020 (Annex-A).
3. I passed my FA examination in 2016 and subsequently FA certificate was presented in the Establishment Branch at DC Office Nowshera (copy of FA certificate is annexed as Annex-B).
4. After issuance of promotion order of 04 Class-IV, It was come to my knowledge that I have been dropped from promotion and one Naib Qasid Named **Mr. Haroon Shah** who was at S. No. 28 (Junior than me) illegally promoted and thereby deprived me from my legal right of promotion.
5. I was dropped from promotion due to the reason that there was no entry in column of qualification in the seniority list but it is ironic that the above said Naib Qasid was promoted instead of this deficiency as there was also no entry of qualification in the seniority list.
6. As i had never been served with any seniority list since my appointment, hence no knowledge about my status.

In view of the above clarification, it is therefore requested that the impugned order may kindly be set aside and a fresh DPC conducted for my due right of promotion.

Secy:	
ADP:	
ADP:	
ADP:	
ADP:	
Branch:	
File No.:	
Date:	6/6/21 17/6/21

Yours Obediently

(S.K.)

(Shoaib-U-Rahman),
Chowkidar (BPS-3)
DC Office Nowshera

0313-9515270

21

WAKALATNAMA

BEFORE THE HON'BLE KP Service Tribunal

Peshawar

Shoebur Rahman.

Plaintiff(s)
Petitioner(s)
Complainant(s)

VERSUS

Govt. of KP

Defendant(s)
Respondent(s)
Accused(s)

By this, power-of-attorney I/we the said Appellant in the above case, do hereby constitute and appoint **MUHAMMAD ARIF JAN** Advocate as my attorney for me/us in my/our name and on my/our behalf to appear, plead, give statement, verify, administer oath and do all lawful act and things in connection with the said case on my/our behalf or with the execution of any decree or order passed in the case in my/our favour/ against which I/we shall be entitled or permitted to do myself/ourselves, and, in particular, shall be entitled to withdraw or compromise the case or refer it to arbitration or to agree to abide by the special oath of any person and to withdraw and receive documents and money from the Court or the opposite party and to sign proper receipts and discharges for the same and to engage and appoint any other pleader or pay him as his fee irrespective of my/our success or failure in case, provided that, if the case is heard at anyplace other than the usual place of sitting of the Court the pleader shall not bound to attend except on my agreeing to pay him a special fee to be settled between us.

Signature of Client

S.K.J.

Accepted
M.A.J.
Muhammad Arif Jan
Advocate High Court
Peshawar
Office No.210, Mumtaz Plaza
G.T Road, Hashtnagri Stop,
Peshawar City.
CNIC No.17201-2275748-7
Bc No.10-6663
Cell: 0333-2212213

“B”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR.

No.

Appeal No..... 78.21 of 20 21

..... Shoaib ur Rehman Appellant/Petitioner

Recd

Secy. Board of Revenue KPM Respondent

Respondent No..... 3

Notice to: —

Deputy Commissioner Now Shera.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on..... 3/3/22 at 8.00 A.M. If you wish to urge anything against the appellants/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No..... dated.....

Given under my hand and the seal of this Court, at Peshawar this..... 21/11

Day of..... Jan 20 22

(for Reply)

Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR.

No.

Appeal No. 7821 of 20 21
Shoaib vs Kehran Appellant/Petitioner

Regd.

Secy: Board of Revenue KPh Respondent

Respondent No. 4
Haroon Shah Junior Clerk Deputy
Commissioner Nowshera.

Notice to: —

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 3/3/22 at 8.00 A.M. If you wish to urge anything against the appellent/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you via this office~~ Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 21st

Day of Jan 20 22

(for Reply)



Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

7821

21

Appeal No. Shoaib vs Rehman of 20

Regd

..... Appellant/Petitioner
Regy. Board of Revenue KPH

..... Respondent

Noor ul Haq Respondent No. Junior Clerk Deputy
Commissioner Nowshera.

Notice to: —

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on..... at 8.00 A.M. If you wish to urge anything against the appellants/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated..... 21/11

Given under my hand and the seal of this Court, at Peshawar this.....

Day of.....20

(for Reply)

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

“B”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, 8.B
PESHAWAR.

No.

Regd.

Appeal No. 7821 of 20 21
Shoaib vs Rahman Appellant/Petitioner
 Versus
Regy: Board of Revenue KPK Respondent

Respondent No. 2
Commissioner Peshawar Division
Peshawar.

Notice to: —

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal ^{3/5/22} *on..... at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No..... dated.....~~

Given under my hand and the seal of this Court, at Peshawar this 21th Day of Jan 20 22

(For Reply)


 Registrar,

? Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

78 21
Appeal No. Shoaib ur Rahman of 20 21
Appellant/Petitioner

Secy: Board of Revenue KPK
Respondent

Secretary Board of Revenue KPK
Peshawar.
Respondent No. 1

Notice to: —


WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellent/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....
Day of.....20 Jan 22

(For Reply)
Wahid
01-02-2022



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No: 54

782

21

APPEAL No. Shoab - ur - Rahman of 20

Appellant/Petitioner

Versus

Sery Board of Revenue KPK Peshawar

Respondent (s)

RESPONDENT(S)

Mr. Haroon Shah Junior Clerk

Notice to Appellant/Petitioner

Deputy Commissioner Moushara

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 05/07/2022 at 1:00 PM

(Copy of Appeal Already Sent)

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

(For Reply)

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

SB

Recd

APPEAL No..... 7821 of 20 22.

Shoaib - vs - Rahman

Appellant/Petitioner

Versus

Sey Board of Revenue KPK Peshawar

RESPONDENT(S)

Respondent (S) Notice to Appellant/Petitioner Noor-ul-haq Junior Clerk

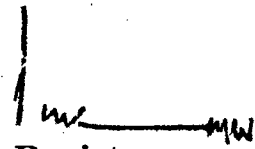
Deputy Commissioner Nowshera

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 05/07/2022 at 9:00 am.

(Copy of Appeal Already Sent)

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

(For Reply)



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.