


18.08.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Mr. Rehman Gul, Superintendentfor the respondents present.

Representative of the respondents submitted copy of the working paper and stated at the Bar that the same has been submitted in the Establishment department on 17.08.2022. Taking it as an interim reply, the department is obligated to submit final implementation report on the next date. Adjourned. To come up for implementation report on 09.09.2022 before S.B.

  
(Mian Muhammad)  
Member (E)

?

**WORKING PAPER**

Subject: **PROMOTION OF SOCIAL CASE WORKER/ FIELD OFFICER/ SUPERVISOR (BPS-16) TO THE POST OF SOCIAL WELFARE OFFICER, SUPERINTENDENT/ MANAGER (BPS-17)**

Consequent upon the Service Tribunal Judgment in service appeal No. 666/2020 (Annexure-A), and according to the rules 2006 amended 2011 the incumbent(s) of the post of Social Case Worker / Field Officer/ Supervisor (BPS-16) with five (5) years of service as such are to be promoted to any of the following Two posts.

1. Social Welfare Officer (BPS-17)
2. Superintendent Welfare Home/ Manager (BPS-17)

1. Social Welfare Officer (BPS-17)

There are 51 sanctioned posts of Social Welfare Officers (BPS-17) in Social Welfare, Special Education and Women Empowerment Department Khyber Pakhtunkhwa (Annexure-B). In terms of S.No.5, Colum/of the Notification No. SOII (SW)II-12/99 dated: 21.09.2006(Annexure-C), the following method has been prescribed for recruitment of Social Welfare Officers (BPS-17):

- (a) "Twenty Percent by promotion, on the basis of seniority-cum-fitness from amongst the Social case workers/ Field Officers and Supervisors with five-year service as such; and
- (b) Eighty percent by initial recruitment".

Table-A

Sanctioned strength of SWOs	Total Filled at Present	Vacant Posts	20% Promotion quota	Filled through promotion	Remaining promotion quota	Remarks
51	36	15	10	6	4	

- 2- Superintendent Welfare Home/ Manager BPS-17.

There are 15 sanctioned posts of Superintendent Welfare Home/Manager (BPS-17) in Social Welfare, Special Education and Women Empowerment Khyber Pakhtunkhwa, (Annexure-D). Thus on the whole, total number of the sanctioned post of above mentioned Superintendent Welfare Home/ Manager are 15 for which the prescribed

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method of recruitment in terms of S. No. (iv) Column-3 of the Notification No. SO-II(SWD)II-12/2011/2823-34 Dated: 29-11-2011 (Annexure-E), is as follow:

- a) Fifty percent by initial recruitment.
- b) Fifty percent by promotion from amongst the holder of the post of Social case workers/Field Officer and Supervisor (BPS-16) with at least 5-years of service as such.

S.No	Nomenclature & BPS of the Post	Sanctioned Strength	Total Filled	Total Vacant	50% Promotion Quota Share	No. of Posts filled Through Promotion	No. of Posts to be filled Through Promotion
1	Superintendent/Manager (BPS-17)	15	06	09	07	02	05

Thus as per Rules a total of 07 out of 15 posts of Superintendent Welfare Home / Manager(BPS-17) are to be filled through promotion from amongst the holder of the post of Social Case Worker / Supervisor/ Field Officer (BPS-16) in which only 02 have been filled thus so far and 05 more are to be filled as such.

Table -C below summarizes Table-A & B

Table-C

S.No.	Nomenclature & BPS of the Post	Sanctioned Strength	Share of Promotion Quota	No. of Posts Filled Through Promotion	Remaining Promotion Quota	Presently Vacant Posts
1	Social Welfare Officer BPS-17	51	10	06	04	15
2	Superintendent Welfare Home / Manager BPS-17	15	07	02	05	09
<b>Total</b>		<b>66</b>	<b>17</b>	<b>08</b>	<b>09</b>	<b>24</b>

There are presently 04 Officers in the list of Social Case Workers (**Annexure-F**), their particulars are as under:

S.No	Name of Officer	Date of 1 <sup>st</sup> Entry into Govt. Service	Length of Service up to 31.07.2022			Remarks
			Year	Month	Days	
1	Mr. Faisal Khan	01.07.2011	11	01	00	
2	Mr. Sabir Khan	03.07.2013	09	00	28	
3	Mr. Sareer Khan	04.07.2013	09	00	26	
4	Mr. Jamal Shah	01.07.2015	07	01	00	

The Officers possess the prescribed length of service, required for promotion to the post of **Social Welfare Officer & Superintendent/ Manager (BS-17)**, and thus are eligible to be promoted as such on regular basis.

- It is certified that the Officers are holding the present post on regular basis.
- Have the prescribed maximum length of qualifying service / experience as required for promotion on regular basis under the rules.
- Neither any anti-corruption/ departmental enquiry is pending against the above mentioned Officers.
- The vacant posts of **Social Welfare Officer & Superintendent/ Manager (BPS-17)** lying vacant are on regular budget side.
- Officers included in the panel of promotion are not granted extra ordinary leave (leave without pay)
- The PERs /Synopsis of PERs in respect of the above mentioned Officers are placed on board at (**Annexure-G**).
- Willingness for promotion based on priority in r/o Officers included in the panel for promotion is (are) placed as (**Annexure-H**).

The Departmental Promotion Committee is therefore requested to determine the suitability of the Officers for promotion as **Social Welfare Officers & Superintendent/ Manager (BPS-17)** on regular basis in light of Service Tribunal Judgement Appeal No. 666/2020 in the particular case.

  
 DEPUTY DIRECTOR (Admin)  
 DIRECTORATE OF SOCIAL WELFARE  
 PESHAWAR

23<sup>rd</sup> June, 2022

Counsel for the petitioner present. Mr. Muhammad Riaz Khan Painsdakhel, Asst: AG alongwith Mr. Naseeb Khan, SO for respondents present.

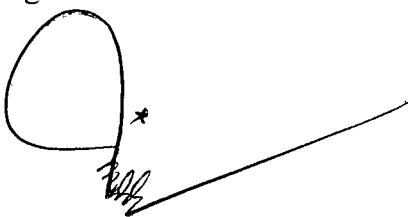
Respondents are directed through Asst: AG to submit implementation report on the next date. To come up for implementation report on 20.07.2022 before S.B.

  
(Kalim Arshad Khan)  
Chairman

20.07.2022

Counsel for the petitioner present. Mr. Muhammad Adeel Butt, Addl. AG alongwith Haidar Ali Senior Clerk for the respondents present.

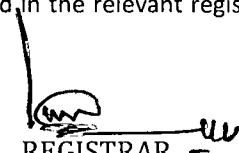


Learned Additional Advocate General states that the respondent department filed CPLA in the august Supreme Court of Pakistan against the judgment under implementation. The respondent department is under obligation to either get the Service Tribunal judgement dated 02.02.2022 suspended or to implement the judgement conditionally subject to the outcome of CPLA. Adjourned. To come up for further proceedings on 18.08.2022 before S.B.

  
(Mian Muhammad)  
Member (E)

Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Execution Petition No. \_\_\_\_\_ 274/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	09.05.2022	<p>The execution petition of Mr. Jamal Shah submitted today by Mr. Noor Muhammad Khattak Advocate may be entered in the relevant register and put up to the Court for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	<u>23/5/22</u>	<p>This execution petition be put up before to Single Bench at Peshawar on <u>26-05-22</u>. Original file be requisitioned. Notices to the parties be also issued for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p>
	26.05.2022	<p>Nobody present for the petitioner. Mr. Kabirullah Khattak, Addl AG for the respondents present.</p> <p>Notices be issued to the respondents for submission of implementation report. To come up for implementation report on 23.06.2022 before S.B.</p> <p style="text-align: right;">  Kalim Arshad Khan Chairman</p>

(X)

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

**EXECUTION PETITION NO. 274 /2022**

IN

SERVICE APPEAL NO: 666/2020

**JAMAL SHAH**

**V/S**

**S. WELFARE DEPTT:**

**I N D E X**

<b>S/N ①</b>	<b>DOCUMENTS</b>	<b>ANNEXURE</b>	<b>PAGE</b>
<b>1</b>	Memo of implementation	.....	1 - 2
<b>2</b>	Affidavit	.....	3
<b>3</b>	Judgment dt: 02.02.2022	<b>A</b>	4 - 9
<b>4</b>	Wakalat Nama	.....	10

Dated: 9.5.2022

**APPELLANT**

Through:

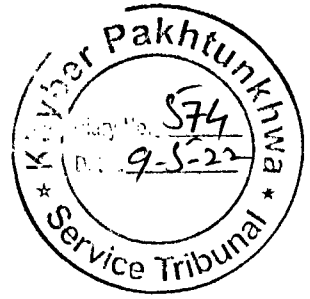
**NOOR MOHAMMAD KHATTAK**

**ADVOCATE**

**0345-9383141**

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

**Implementation Petition No. 274 /2022**  
**In**  
**Appeal No. 666/2020**



Mr. Jamal Shah, Social Case Worker (BPS-16),  
O/O Center for MRPH, Distract Dir Upper

.....**PETITIONER**

**VERSUS**

- 1- The Government of Khyber Pakhtunkhwa, through Chief Secretary Khyber Pakhtunkhwa Peshawar.
- 2- The Secretary Finance Department, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 3- The Secretary Establishment Department, Khyber Pakhtunkhwa, Peshawar.
- 4- The Secretary (Social Welfare) Special Education & Women Empowerment Department, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 5- The Director (Social Welfare), Directorate of Social Welfare, Special Education & Women Empowerment, Jamurd Road, Peshawar.

.....**RESPONDENTS**

**IMPLEMENTATION PETITION FOR DIRECTING THE**  
**RESPONDENTS TO IMPLEMENT/OBEY THE**  
**JUDGMENT DATED 02.02.2022 OF THIS**  
**HONORABLE SERVICE TRIBUNAL IN LETTER AND**  
**SPIRIT**

**R/SHEWETH:**

- 1- That the petitioner filed service appeal bearing No. 666/2020 before this august Service Tribunal against the impugned Service Rules whereby promotion quota reserved for the cadre of the appellant to the post of Manager and Social Welfare Officer BPS-17 has been washed away.
- 2- That the appeal of the petitioner/appellant was fixed before divisional bench of this Honorable Tribunal on 02-02-2022 and the divisional bench of this Honorable Tribunal very graciously allowed the Service appeal of the appellant vide its judgment dated 2-2-2022. The concluding Para of judgment is under:



***In view of the forgoing discussion, the instant appeal is accepted. The impugned service rules dated 25-09-219 is set aside to the extent of Social Case Workers and the service rules, 2006 amended in 2011 are revived for the purpose of promotion of the appellant as well as his other colleagues till time, proper service rules are framed for Social Case Workers".*** Copy of the judgment dated 02-02-2002 is attached as annexure.....**A.**

- 3- That after obtaining copy of the order dated 02-02-2022 the petitioner/appellant applied to the Department for its implementation but the respondent Department turned a deaf ear to the petitioner.
- 4- That since the passage of more than 02 months of time the department has not implemented or obeyed the judgment dated 02-02-2022 passed by this Honorable Tribunal.
- 5- That the petitioner has no any other remedy but to file this implementation petition.

It is therefore, most humbly prayed that the respondents may be directed to implement the judgment dated **02-02-2022** in letter and spirit. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the petitioner.

Petitioner

**JAMAL SHAH**



Through:

**Noor Mohammad Khattak**  
Advocate, High Court, Peshawar



(3)

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

**EXECUTION PETITION NO. \_\_\_\_\_/2022**

**IN**

**SERVICE APPEAL NO: 1558/2019**

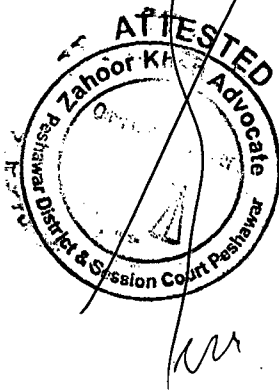
**JAMAL SHAH**

**VS**

**S. WELFARE DEPTT:**

**AFFIDAVIT**

Stated on oath that the contents of the accompanying **execution petition** are correct to best of my knowledge and belief and nothing has been concealed from this Honorable Service Tribunal.

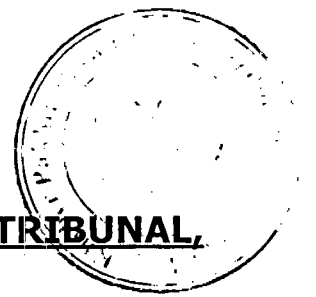


  
**DEPONENT**

**CERTIFICATE:**

Certify that no earlier service appeal has been filed by the appellant in the instant matter before this Honorable Service Tribunal.

  
**CERTIFICATION**



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

**SERVICE APPEAL NO. 666 / 2020**

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 365

Dated 15/1/2020

Mr. Jamal Shah, Social Case Worker (BPS-16),  
O/O Centre for MRP, Dir Upper.

**APPELLANT**

**VERSUS**

- 1- The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 2- The Secretary (Finance) Department, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 3- The Secretary Establishment Department, Khyber Pakhtunkhwa, Peshawar.
- 4- The Secretary (Social Welfare) Special Education & Woman Empowerment Department, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 5- The Director (Social Welfare), Directorate of Social Welfare, Special Education & Women Empowerment, Jamrud Road, Peshawar.

**RESPONDENTS**

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED SERVICE RULES NOTIFIED ON 25.9.2019 WHEREBY THE PROMTION QUOTA RESREVED FOR THE CADRE OF THE APPELLANT TO THE POST OF MANAGER AND SOCIAL WELFARE OFFICER (BPS-17) HAS BEEN WASHED AWAY AND AGAINST THE IMPUGNED APELLATE ORDER DATED 16.12.2019 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REGERTTED ON NO GOOD GROUNDS**

Filed to-day

Registrar

15/01/2020

**PRAYER:** That on acceptance of this appeal the impugned Service Notified on 25.9.2019 may be set aside and the respondents may kindly be directed to restore/revive the old service rules Notified on 21.9.2006 amended on 29.11.2011. That the respondents may further please be directed that not to disturbed the quota reserved for the cadre of the appellant to the post of Manager & Social Welfare Officer (BPS-17). Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

e-submitted to -reg  
id filed.

Registrar

24/01/20

ATTESTED

REGISTRAR

(5)



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 666/020

Date of Institution ... 15.01.2020

Date of Decision ... 02.02.2022

Mr. Jamal Shah, Social Case Worker (BPS-16). O/o Centre for MRP, Dir Upper  
... (Appellant)

**VERSUS**

The Government of Khyber Pakhtunkhwa, through Chief Secretary Khyber  
Pakhtunkhwa, Civil Secretariat Peshawar and others. ... (Respondents)

Noor Muhammad Khattak,  
Advocate

... For Appellant

Muhammad Adeel Butt,  
Additional Advocate General

... For respondents

**AHMAD SULTAN TAREEN**  
**ATIQU-UR-REHMAN WAZIR**

...  
...

**CHAIRMAN**  
**MEMBER (EXECUTIVE)**

**JUDGMENT**

**ATIQU-UR-REHMAN WAZIR MEMBER (E):-**

Brief facts of the

case are that the appellant was initially appointed as Social Case Worker (SCW) BPS-16 vide order dated 22-11-2016. Under the old rules notified on 21-09-2006, the SCW had the channel of promotion to the post of Superintendent Welfare Home BPS-17 and to the post of Social Welfare Officer BPS-17. Such rules were further amended vide order dated 29-11-2011, whereby 50% quota was reserved for the cadres of Field Officers/Supervisors and SCW to the post of Superintendent Welfare Home/Manager BPS-17. As per seniority list dated 19-03-2019 in respect of SCW BPS-16, the appellant stood as serial No 8 and the appellant was quite hopeful for promotion to the post of Social Welfare Officer BPS-17, as nine posts were vacant in promotion quota. Similarly promotion of the

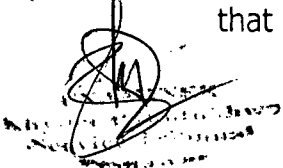
**ATTESTED**

Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

appellant was also due for the cadre of Superintendent and Manager BPS-17, as total 12 posts were vacant, but in the meanwhile the impugned service rules brought in field vide notification dated 25-09-2019, by virtue of the impugned service rules, promotion quota of the appellant to the posts of Manager, Superintendent and Social Welfare Officer BPS-17 has been washed away by lifting the cadre of the appellant as block cadre. Feeling aggrieved, the appellant filed departmental appeal before the appellate authority, which was regretted by the appellate authority vide impugned order dated 16-12-2019, hence the instant service appeal with prayers that the impugned notification dated 25-09-2019 may be set aside and the respondents may be directed to restore/revive the old service rules notified on 21-09-2006 amended on 29-11-2011 with further prayers not to disturb the quota reserved for the cadre of the appellant to the post of Manager & Social Welfare Officer BPS-17.

02. Learned counsel for the appellant has contended that the impugned service rules dated 25-09-2019 and the impugned appellate order dated 16-12-2019 are against law, rules and norms of natural justice and material on record, hence not tenable and liable to be set aside; that the appellant has not been treated in accordance with law, as such the respondents violated Article-4 and 25 of the Constitution; that the treatment meted out to the appellant is clear violation of Fundamental Rights of the appellant as enshrined in the Constitution; that as per Article-37 of the Constitution, the state is bound to promote social justice and eradication of social evils and accordingly the action and inaction of the respondents squarely falls within the violation of the said Article; that inspite of eligibility and seniority, the appellant has been ignored by the respondents from promotion, as such the impugned service rules dated 25-09-2019 are based on malafide and arbitrary intentions; that the appellant has been discriminated by the respondents as such, the respondents violated the principle of natural justice; that action of the respondents by issuing the impugned service rules is violative of

ATTESTED

A handwritten signature is written over a circular stamp. The stamp contains some illegible text, possibly a date or a reference number.

Article-38 (e) of the Constitution; that in light of Section-9 of the Civil Servant Act, 1973 read with Rule-7 of the Khyber Pakhtunkhwa (Appointment, Promotion & Transfer) Rules, 1989, the appellant is fully entitled for promotion to the next grade.

03. Learned Additional Advocate General for the respondents has contended that the service rules are framed, amended or repealed by standing service rules committee, having representation from administration department, establishment department, law department and Finance department; that the existing service rules have been framed under a legal mandate in accordance with principle of fair play giving equal opportunity to all the cadres adequate prospects of career progression; that complete re-structuring of the department is under process and efforts are underway to provide suitable ladder of promotion to all cadres including the appellant; that draft service rules under the proposed re-structuring are under process, where avenue of promotion @ 5% by promotion to BPS-17 from amongst the SCW has been proposed, which will be done in due course of time and grievance of the appellant will be settled in due course.

04. We have heard learned counsel for the parties and have perused the record.

05. As per old service rules notified on 21-09-2006, promotion prospects for the post of SCW to the post of Superintendent Welfare Home BPS-17 was 100% on the basis of promotion from amongst the posts of Supervisor/Field Officer/ SCW/ Office Superintendent with at least five years service as such. Besides, promotion to the post of Social Welfare Officer BPS-17 was also @ 20% from amongst the holders of posts of Field Officers/Supervisors and SCW with at least five years service as such. Such Rules were amended vide notification dated 29-11-2011, where promotion to the post of Superintendent Welfare Home/Manager BPS-17 was made @ 50% by promotion from amongst the holder of posts of Field Officers/Supervisor and SCW with at least five years service as such. Service rules


ATTESTED

COMMISSIONER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

were further amended vide notification dated 25-09-2019, where the post of Manager BPS-17 is to be filled @ 10% by promotion from amongst the administrative officers with at least three years service as such and post of the Social Welfare Officer BPS-17 is to be filled @ of 10% by promotion from amongst the holder of post of field officers with at least five years service as such, hence the post of the appellant i.e. Social Case Worker is totally removed from the channel of promotion. On query the respondents has submitted draft service rules in respect of the cadre of the appellant, where promotion @ 5% from amongst the holder of posts of SCW and Office Superintendent is proposed to be promoted to the posts of Assistant Director/Social Welfare Officer/Manager/Administrative Officer/ Rehabilitation Officer and Superintendent. The respondents further informed that draft service rules are under process and will be done in due course of time

06. We have observed that cadre of the appellant had a separate seniority and separate job description. In the first place, deletion of such cadre from promotion is not justifiable as such cadre was holding a prominent position in promotion in previous service rules and sudden deletion of the cadre from promotion seems to be an act of omission. Contention of the respondents to the effect that service rules are in the making does not hold force, as the appellant as well as his other colleagues were in promotion zone, as is evident from record, hence leaving them in the lurch without any service rules would be detrimental to the interest of the appellant, which however is not allowable. Undoubtedly, amendments in rules does fall within the domain of the respondents but they cannot be allowed if the amendment so made are in conflict with fundamental rights or ultra vires or malafide. In the instant case, the appellant and his colleagues were under consideration for promotion, in the meanwhile the amended rules were brought in field, where no remedy is available for the post of the appellant, rather post of the appellant is deleted from the list of promotion,

ATTESTED


  
 Secy. Tribunal  
 Peshawar

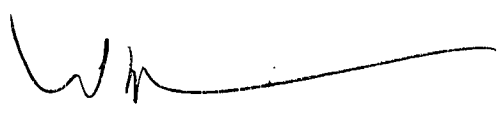
hence their promotions were stopped and asked them to wait for a set of another amendments in the rules, which is illogical. It may take years, while restructuring the departments and making rules for it, but at the moment, keeping them deprived of promotion due to fresh amendment, where the post of appellant is excluded from promotion, rather these amended rules in its essence are not meant for the post of the appellant and service rules pertaining to the appellant is in the pipe line. In such a situation, equity and fair play demands that the old rules shall apply on them for the purpose of promotion until arrival of new rules. Moreover merger of two cadres needs deep appreciation of the seniority of the holder of posts in light of Civil Servants (Seniority) Rule, 1993. The appellant is an aggrieved person, who shall not be deprived of his fundamental right of equality before law and protection from discrimination. The appellant as well as his other colleagues are in promotion zone and they shall not suffer for delay in formulating service rules at belated stage by the respondents, which ultimately would suffer the appellant as well as his other colleagues.


07. In view of the foregoing discussion, the instant appeal is accepted. The impugned service rules dated 25-09-2019 is set aside to the extent of Social Case Workers and the service rules, 2006 amended in 2011 are revived for the purpose of promotion of the appellant as well as his other colleagues till the time, proper service rules are framed for Social Case Workers. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED

02.02.2022

  
(AHMAD SULTAN TAREEN)  
CHAIRMAN

  
(ATIQ-UR-REHMAN WAZIR)  
MEMBER (E)

**ATTESTED**  
  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar



**VAKALATNAMA**

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

Execution of  
~~APPEAL~~ NO: \_\_\_\_\_ OF 2022

Jamal Shah (APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

S. Welfare Deptt. (RESPONDENT)  
(DEFENDANT)

I/We Jamal Shah

Do hereby appoint and constitute **NOOR MUHAMMAD KHATTAK Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. \_\_\_\_/\_\_\_\_/2022

  
**CLIENTS** حجازی

**ACCEPTED**

**NOOR MUHAMMAD KHATTAK**

**UMER FAROOQ MOHMAND**

**KAMRAN KHAN**

**MOHAMMAD MAAZ MADNI**

  
**HAIDER ALI  
ADVOCATES**

**"B"**

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

No. *Recd*

Appeal No. *SB* E.P.No. *274* of 20 *22*

*Jamol Shah* Appellant/Petitioner

Versus

*Through Chief Secy KPK Peshawar* Respondent

Respondent No. *62*

Notice to: *Director (Social Welfare), Directorate of Social Welfare, Special Education & Women Empowerment, Jamrud Ro.*

WHEREAS an appeal/petition under the provisions 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 *Peshawar* \*on *7.5/06/2022* 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 *03* .....

Day of *June* ..... 20 *22*

*For Implementation Report*

*[Signature]*

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.

*SB*

~~Appeal No.~~ *E.P No. 274* ..... of *30*

*Jamal Shah* ..... Appellant/Petitioner

Versus

*Through Chief Secy KPK Peshawar* ..... Respondent  
Respondent No. *(1)*

Notice to: —

*Govt of KPK through Chief Secy KPK Peshawar*

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.....*23/06/2022*.....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 <sup>*E.P.*</sup> 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...*03*.....

Day of.....*June*.....*20*

*For Impl-ment-  
Report*

*[Signature]*

**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.

*[Handwritten notes and stamps]*

**“B”**

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

No.

*SB*

*E.P No. 274*  
 Appeal No. .... of 20*22*

*Jamal Shah* ..... Appellant/Petitioner

*Through Chief Secy KPK Peshawar* ..... Respondent  
*(2)*

Respondent No. ....

Notice to: — *Secy Finance Deptt: KPK Civil Secretariat*  
*Peshawar*

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Copy of ~~appeal~~<sup>*E.P*</sup> 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.....*03*.....

Day of.....*June*.....20*22*

*For Impl-ment-  
 Report*

*[Signature]*

**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.

Secy: *[Signature]*  
 Dairy No. *76*  
 Date *7-6*

**"B"**

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

No.

E.P No. 274

Appeal No. .... of 20 <sup>22</sup>

Jamal Shah

Appellant/Petitioner

Through Chief Secy <sup>versus</sup> KPK Peshawar

Respondent

Respondent No. ....

Secy Establishment Deptt: KPK 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 \*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.

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Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated..... 03

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

Day of.....20

For Registration Report

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. *Regd*

E.P No. 274

Appeal No. .... of 20<sup>22</sup>

*Jamal Shah*

Appellant/Petitioner

Through Chief Secy *Versus* *KKK Peshawar*

Respondent

Respondent No. ....

*Secy (Social Welfare) Special Education & Women*

Notice to:

*Empowerment Deptt: KKK Peshawar.*

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 *23/08/2022* 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.

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

*03*

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

Day of *June* ..... 20 ..

*For Impl-ment-  
tion  
Report*

*[Signature]*

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.  
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