


27.07.2015

Appellant in person present, Mr. Farhaj Sikandar, GP with Muhammad Khan, AAO and Amanullah, SMS for the official respondents and counsel for private respondent No. 6 present. Arguments heard and record perused. Vide our detailed order of to-day in connected Service Appeal No. 989/2013, titled "Atta Ullah Khan Versus Government of KPK through Secretary Agriculture etc", this appeal is also disposed of as per detailed order. Parties are left to bear their own costs. File be consigned to the record.

ANNOUNCED

27.07.2015.


MEMBER
Camp Court, D.I.Khan

1095/14

31.3.2015

Appellant with counsel and Minhaj Sikander GP with Amanullah SMS for respondents no 1 to 4 present and written reply filed. Counsel for the appellant also submitted, that the respondents department may be restrained from undertaking promotion on the basis of disputed seniority. Since further promotion at this stage may complicate the matter, therefore, status quo be maintained till the date fixed. To come up for rejoinder on 28.4.15 at camp court D.I.Khan

MEMBER
Camp Court, D.I.Khan

28.4.2015

Appellant with counsel Mr. Farhaj Sikandar GP for the official respondents. Rejoinder to written reply of official respondents filed. Riazullah Mahsood, Advocate for private respondent No. 6 present and reply submitted, which is allowed and placed on file, copy handed over to counsel for the appellant. To come up for rejoinder and arguments on 25.05.2015, at camp court, D.I.Khan. Till then status quo is extended.

MEMBER
Camp Court, D.I.Khan

25.05.2015

Appellant in person, Mr. Farhaj Sikandar, GP with Amanullah, for the official respondents and junior to counsel for private respondent No. 6 present. Due to general strike of the legal fraternity, counsel for the appellant is not available. To come up for arguments at camp court, D.I.Khan on 27.07.2015 at camp court, D.I.Khan. Till then status quo is extended.

MEMBER
Camp court, D.I.Khan

29-12-14-

Appellant in person present. Since the Tribunal is incomplete, therefore this case is adjourned for preliminary hearing to 26-1-2015 at camp court, D.I.Khan.

[Signature]
Registrar
Camp Court, D.I.K.

Appellant deposited Process fee
Security Rs. 450/-
[Signature] 29/12/14

01.2015

Appellant with counsel present and heard. The learned counsel for the appellant argued that appellant has not ^{been} treated in accordance with law and rules. He has been deprived from his due place and shown junior to respondents No. 546 in final seniority list as stood on 1.1.2014. Points raised at the Bar, need consideration. Admit. Process & security be deposited within 10 days. Thereafter, notices be issued to respondents for submission of written reply on 23-2-2015 at Camp Court, D.I.Khan.

[Signature]

Member
Camp Court D.I.Khan

23-2-15.

Appellant in person and Amanullah A.O. for respondents No. 1 to 4 with counsel present. Respondent No. 546 absent despite proper service upon them, proceeded against ex parte. G.P. requested for time to file reply. Allowed. To come up for written reply on 31-3-15 at camp court, D.I.K.

[Signature]
Member
Camp Court, D.I.K.

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 1095/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	02/09/2014	<p>The appeal of Mr. Muhammad Yousaf presented today by Mr. Shaukatullah Khan Bettani Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR</p>
2	16-10-14	<p>This case is entrusted to Touring Bench D.I.Khan for preliminary hearing to be put up there on <u>27-10-14</u></p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p>
3	27-10-2014	<p>Appellant in person present and requested for adjournment. Case adjourned to 24-11-2014 for preliminary hearing at Camp Court, D.I.Khan.</p> <p style="text-align: right;"><i>[Signature]</i> Registrar Camp Court, D.I.K.</p>
3	24-11-2014	<p>Present as before on 27-10-14. Since the Tribunal is incomplete, therefore this case is adjourned to 29-12-2014 for preliminary hearing at Camp Court, D.I.K.</p> <p style="text-align: right;"><i>[Signature]</i> Registrar Camp Court, D.I.K.</p>


BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR CAMP COURT AT DERA ISMAIL KHAN.

Service Appeal No. 1095/2014

Muhammad Yousaf(**Appellant**)


VERSUS

Govt; of KPK, etc(**Respondents**).

INDEX

S.No	Description of Documents	Annexure	Page
1.	Grounds of Service Appeal alongwith affidavit		1-6
2.	Copy of appointment letter and service book.	"A, A-1"	7-14
3.	Copy of corrigendum.	"B"	15
4.	Copy of tentative seniority list.	"C"	16-18
5.	Copy of objection petition and final seniority list.	"D, DI"	19-22
6.	Copy of covering letter and departmental appeal.	"E & E1"	23-24
7.	Wakalatnama		25

Your Humble Appellant


Muhammad Yousaf
Through counsel

Dated: 02/09/2014


SHAUKAT ULLAH KHAN BETTANI
Advocate High Court
Dera Ismail Khan.

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR CAMP COURT AT DERA ISMAIL KHAN.

Service Appeal No. 1095/2014

S. W. F. Peshawar
1125
Dated 02/09/2014

Muhammad Yousaf S/o Abdus Sattar,
Office Assistant (BS-16), District Director
Agriculture (Extension) Office, Dera Ismail Khan.

.....(Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa, through Secretary Agriculture, live stock, co-operative Department, Peshawar.
2. Director General, Agriculture (Extension) Khyber Pakhtunkhwa, Peshawar.
3. District Director, Agriculture (Extension), Dera Ismail Khan.
4. District Co-ordination Officer, now Deputy Commissioner Dera Ismail Khan.
5. Mohammad Rafiq, Office Assistant, Agency Agriculture Office, Mehmand Agency.
6. Intiaz Hussain, Office Assistant, District Agriculture Office Tank.

Respondent No 5
40 are proceeded
against exports

6907
23/2/15

..(Respondents)

[Signature]
2/9/14

SERVICE APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT 1974, AGAINST THE FINAL SENIORITY LIST OF ASSISTANT (BS-14) OF AGRICULTURE DEPARTMENT (EXTENSION WING) AS STOOD ON 01/01/2014, ISSUED BY THE RESPONDENT NO. 2 VIDE NOTIFICATION NO. 15/54-A/ESTT/4933-96/DG, DATED PESHAWAR THE 15/04/2014, WHEREIN THE APPELLANT HAS BEEN SHOWN JUNIOR TO THE RESPONDENTS NO. 5 & 6, WHEREAS ACTUALLY THE APPELLANT IS SENIOR TO THE PRIVATE RESPONDENTS NO. 5 & 6.

[Signature]

Respected Sir,

- 1-** That the appellant was appointed by the respondent No. 4, as a Office Assistant (BS-11) in the office of District Agriculture (Extension)

Office Dera Ismail Khan, against a vacant post, after observing all codal formalities vide order No. 7260/DCO(A&T) dated 20/12/2005. Copy of such appointment letter and copy of service book are enclosed as **Annexure "A & A-1"** respectively.

2- That in para No. 2 of the above said appointment letter, inadvertently / mistakenly mentioned regarding temporary Service which was subsequently omitted / rectified by the respondent No.4, through corrigendum bearing No. 13555-58/DCO(A&T), dated 19/11/2008, such corrigendum is a continuation of the earlier appointment order No. 7260/DCO(C&T) dated 20/12/2005. Copy of corrigendum is enclosed as **Annexure "B"**.

3- That later on the post of office Assistant was upgraded from BS-11 to BS-14 and again up-grad to BS-16, now the appellant is serving as office Assistant B.S-16.

4- That a Departmental Tentative seniority list of Office Assistant was prepared by the respondent No. 2 vide notification No. 15/54-A/Estt/1244-69/DG, Dated 12/01/2014, wherein the appellant was placed at serial No. 12 instead of serial No. 10, while the respondent No. 5 & 6 were placed at Serial No. 10 & 11 respectively whereas both of them are juniors to the appellant. Copy of the tentative seniority list is enclosed as **Annexure "C"**.

5- That appellant being aggrieved with the tentative seniority filed objection petition to respondent No. 2 correcting the tentative

Shankar S

seniority list, vide office Endst No. 543/DDA, dated 14/02/2014, but of no avail, and the appellant and respondents No. 5 & 6 were kept on same position in the final seniority list issued by the respondent No. 2 vide notification No. 15/54-A/Estt/4933-96/DG, dated Peshawar the 15/4/2014. Copy of objection petition and said final seniority list is enclosed as **Annexure "D & D1"**.

6- That appellant being dissatisfied and aggrieved with the impugned final seniority list preferred a departmental appeal / representation to the respondent No. 1, on 12/05/2014 vide office Endst No. 2732/DDA, dated Dera Ismail Khan the 3/7/2014, copy of the covering letter and copy of departmental appeal dated 12/05/2014 are enclosed as **Annexure "E & E1"** **respectively.**

7- That the respondent No. 1 has not decided the representation / departmental appeal within stipulated period, hence this service appeal is being preferred with the following grounds amongst other viz;-



GROUND:-

a) That the impugned seniority list is against the settled principal of law and rules of promotion in service and has no legal sanctity, hence ineffective upon the rights of the appellant.

b) That the date of appointment of respondent No. 5 is 13/04/2007 while date of appointment of the respondent No. 6 is 11/11/2008, whereas

the date of appointment of the appellant is 20/12/2005, as such the appellant is senior to the respondents No. 5 & 6 who are placed at serial No. 10 & 11 in the impugned seniority list while the appellant is kept on serial No. 12 which is against the law and rules and contrary to the facts on record hence the impugned seniority list is liable to be revised.

c) That on 19/11/2008, the respondents No. 4, only corrected / rectified his own previous order dated 20/12/2005, by way of issuing corrigendum, which does not amount to a fresh order, since the appellant is entitled for the seniority on the basis of his appointment date i.e 20/12/2005 as such the respondent No. 2 is erred in law to consider the date of correction for the purpose of seniority and not the date of appointment, hence the seniority list is illegal and incorrect in the eyes of law and is liable to be rectified.

d) That the impugned seniority list is in violative of service rules and statutory provision as well as the dicta of superior Courts pronounced in a number of judgments, hence the same needs to be revised an corrected.



It is, therefore, humbly prayed that this Honourable Tribunal will be pleased to set aside the impugned seniority list issued by the respondent No. 2 vide notification No. 15/54-A/Estt/4933-96/DG, dated Peshawar the 15/04/2014 and will be further pleased to direct the respondent authority to issue fresh / revised seniority and place the

appellant as senior to the respondents No. 5 & 6 and any other appropriate relief which this Honourable Tribunal in the given circumstances may deem fit and appropriate in the interest of justice.

Your Humble Appellant



Muhammad Yousaf
Through counsel

Dated: 02/09/2014



SHAUKAT ULLAH KHAN BETTANI
Advocate High Court
Dera Ismail Khan.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR CAMP COURT AT DERA ISMAIL KHAN.**

Service Appeal No. _____/2014

Muhammad Yousaf(**Appellant**)

VERSUS

Govt; of KPK, etc(**Respondents**).

AFFIDAVIT

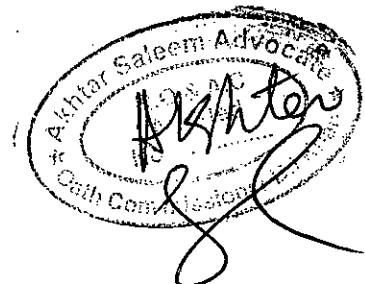
I, **Muhammad Yousaf** S/o Abdus Sattar, Office Assistant (BS-16), District Director Agriculture (Extension) Office, Dera Ismail Khan, do hereby solemnly affirm declared on oath that contents of the above **Appeal** are true and correct to the best of my knowledge and nothing has been concealed from this Honourable court.

Waf.
Deponent

IDENTIFIED BY:

Shaukat

SHAUKAT ULLAH KHAN BETTANI
Advocate High Court,
Dera Ismail Khan.

Akhtar


"ANEX A"

7

District Government DIKhan

No. 7250 DCO(A&T)

Dated 20/12 /2005.

ORDER

Mr. Muhammad Yousaf S/O Abdus Sattar, R/O Islamia Colony DIKhan is hereby appointed as Assistant (BPS-11) against the vacant post in the office of District Officer Agriculture (E) DIKhan on contract basis.

His services will be purely on temporary basis and can be terminated without assigning any notice and will not claim for seniority or any right for regular service.

District Coordination Officer,
DIKhan.

Endst: no: and dated even

Copy to:

1. Executive District Officer, Agriculture DIKhan for information and further necessary action with reference to his letter No. 3251 (Agri) Estt: dated 01/102005.
2. District Officer Agriculture (E), DIKhan
3. District Accounts Officer, DIKhan
4. Official concerned.

No. 6,114-15 /EDO Agri: Estt:
Dated: D.I. Khan, the 21/12 /2005;

District Coordination Officer,
DIKhan.

Copy of the above forwarded to:-

1. The District Officer Agriculture, DIKhan; for information and compliance.
2. The Director General, Agriculture (Extn:) NWFP Peshawar; for favour of information, please.

Attested

District Officer Agriculture
Dera Ismail Khan

Executive Distt: Officer,
Agriculture, D.I. Khan.

Attested
Abankey

Note: - The entries in this page should be renewed or re-attested at least every five years, and the Signature in lines 9 and 10 should be dated.

ANEX A-1

8

Name Muhammad Yousof

Race Sheikh Razi Khel

Residence Islamia Colony, Sheikh Yousof Road D.I. Khan.

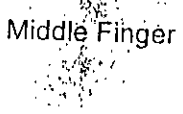
Father's name and residence Abdus Sattar

Date of birth by Christian era or as nearly as can be ascertained. 01-04-1975, 1st April One Thousand Nine Hundred and Seventy Five.

Exact height by measurement 5'-6"

Personal marks for identification A mole on left eyebrow.

Left hand thumb and finger impression of (non-gazetted Officer) _____



Date of Birth verified from S.S.C Certificate.

Signature of Government Servant _____

Signature and Designation of the Head of the Office, or other Attesting Officer.

[Signature]
DISTRICT OFFICER
Agriculture, D.I. Khan

Attested
[Signature]

9	10	11	12	13		14	15	
Signature and designation of Head of office or other attesting Officer in Station of posts 1 to 8	Date of termination or appointment	Reason of termination (such as promotion transfer dismissal etc)	Signature of the Head of the office or other attesting Officer	Name and duration of leave taken	LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تعین		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment or censure, or reward or praised of the Government servant سزا یا جزایا غیر مناسب کارکردگی کارپکارڈ
					Period	Govt. to which debitable		
	تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی - تبادلہ یا برطرفی	دستخط افسر مجاز	رخصت کی نوعیت و معیار	عرصہ	گورنمنٹ نے رقم ادا ہوگی	دستخط افسر مجاز	

Granted five days E.o Leave with out pay w.e. from 17.2.07 to 21.2.07 on account of wilful absent from duty vide DOA Dikhan office order No 910-15 dt: 22.2.07

[Signature]
DISTRICT OFFICER
Ajmer, D. Khan

Granted seven days E.o Leave with out pay w.e. from 22.2.07 to 28.2.07 vide DOA Dikhan office order No 1003-10 dt: 28.2.2007

[Signature]
DISTRICT OFFICER
Ajmer, D. Khan

Transferred to E.o (N.S.) Dikhan along with post vide o/o No 105 dt: E.O N.S. order 11/3/07

[Signature]

[Signature]

office order issued vide No 910-15 dt: 22.2.2007 & o/o No 103-10 dt: 28.2.2007 is hereby cancelled with disallowance vide DOA Dikhan No 1268 dt: 14.5.07

[Signature]

Attested
[Signature]

Signature and designation of the Head of the office or other Attesting Officer in columns 1 to 8	10 Date of termination or appointment	11 Reason of termination (such as promotion transfer dismissal etc)	12 Signature of the Head of the office of other attesting Officer	13 LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government		14 Signature of the head of the office or other Attesting officer	15 Reference to any recorded punishment or censure, or reward or praised of the Government servant
				Name and duration of leave taken	Period		
دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی۔ تبادلہ۔ یا انتقال	دستخط افسر مجاز	رخصت کی نوعیت و معیار	چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تین	دستخط افسر مجاز	مزایا یا غیر مناسب کارکردگی کارپیکار
	31/5/07				عرصہ		

Executive District Officer
Healthcare, D. I. KHAN

Executive District Officer
Healthcare, D. I. KHAN

Executive District Officer
Healthcare, D. I. KHAN

DISTRICT OFFICER
Agriculture, D. I. KHAN

DISTRICT OFFICER
Agriculture, D. I. KHAN

Cutting attested

District Officer
Department of Agriculture

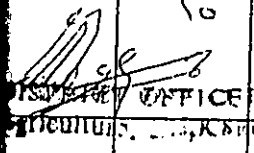
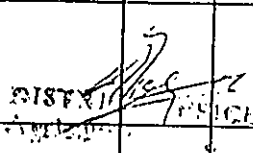

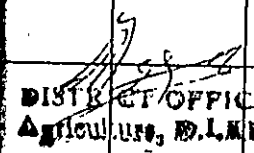
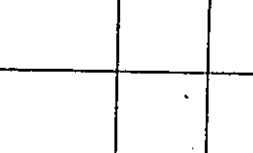
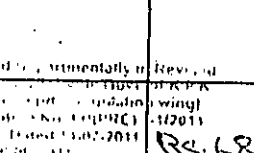
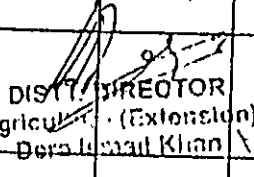
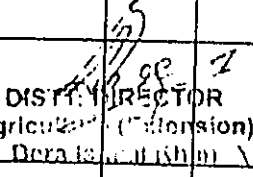
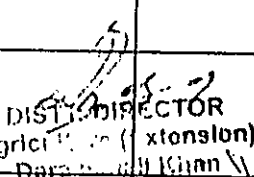
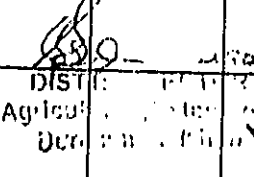
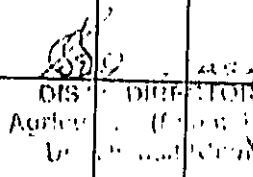
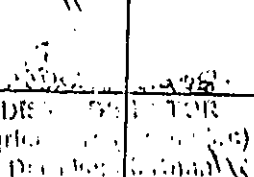
30/11/07

30/11/07

DISTRICT OFFICER
Agriculture, D. I. KHAN

DISTRICT OFFICER
Agriculture, D. I. KHAN

Attested
Dhanraj

9	10	11	12	13		14	15
Signature and designation of the Head of the office or other Attesting Officer in continuation of Forms 1 to 8	Date of termination or appointment	Reason of termination (such as promotion transfer dismissal etc)	Signature of the Head of the office or other attesting Officer	LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment or censure, or reward or praised of the Government servant
				Name and duration of leave taken	پارہ ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تین		
				Period	Govt. to which debitable		
	30/11/10	Annual leave					Service Verified from the Pay Roll record w.e.f. 30/11/10
							
							Pay Band 18, 19, 20, 21, 22, 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
							
	30/11/11	Annual leave					Service Verified from the Pay Roll record w.e.f. 30/11/11
							
	30/11/12	Annual leave					Service Verified from the Pay Roll record w.e.f. 30/11/12
							

Attested
Shankar

District Government DIKhan
No. 13555-58 DCO (A&T)
Dated 19-11/2008

CORRIGENDUM: -

In supersaction of this office No. 7260 DCO (A&T) Dated: 20-12-2005.
Para No.2 of this office even no & date is hereby omitted.

District Coordination Officer
Dera Ismail Khan.

Endst: No. & dated even.

Copy to the:

- 1- Executive District Officer Agriculture (E) DIKhan.
- 2- District Officer Agriculture (E) DIKhan.
- 3- District Accounts Officer DIKhan.
- 4- Official Concerned.

District Coordination Officer
Dera Ismail Khan.

Handwritten signature

6039
cc
BOO Agri: dlt 17.12.2008.

*D S Agri, Baling NWPP Bala, in continuation of
this office letter ends No. 4164-15 dlt: 21.12.2005
having 7 information pl.*

Attested
Handwritten signature
District Officer Agriculture
Dera Ismail Khan.

Handwritten signature
D S Agri,
Dera Ismail Khan.

Attested
Handwritten signature

"ANEX D"

19

To

The Director General,
Agriculture Extension
Govt: of Khyber Pakhtunkhwa Peshawar,

Through: **PROPER CHANNEL**

Subject: APPEAL/REQUEST FOR CORRECTION IN SENIORITY LIST OF OFFICE ASSISTANT.

Respected sir,

Kindly refer to your respective office No. 15/54-A/Est/1244-69/DG dated 22-01-2014 regarding the subject tentative seniority list of office Assistant, as it stood on 01/01/2014.

With profound respect, it is humbly submitted to your good self that I was appointed as assistant in BPS-11 against vacant post vide District Co-ordination officer D.I.Khan office No. 7260/DCO (A & T) Dated 20/12/2005 (order copy attached).

In the above mentioned order paragraph two (2) was omitted by the honourable District Co-ordination officer D.I.Khan who issued corrigendum vide his office No. 13555-58/DCO (A & T) dated 19/11/2008 (copy attached).

Respected Sir,

In the corrigendum dated 19/11/2008 which is in continuation of the previous order, neither the date is recorded nor it is with immediate effect.

It is therefore, requested to your kind honour to please re-examine my case favourably and the seniority list be rectified and re-issued by your respective office, in which my name may please be consider at S. No. (10) instead of S.No. (12), as I am senior to S.No. (10) and (11).

I pray for your long happy life.

Thanks and obliged.

Your obedient servant

(Muhammad Yousaf)
Office Assistant BPS-14
% District Director Agriculture
Extension D.I.Khan.

Endst: No. 543 / DDA

Dated D.I.Khan. 14/2/2014

Strongly recommended and submitted in original along with appointment order and copy of corrigendum to the Director General Agriculture extension Govt. of Khyber Pakhtunkhwa Peshawar, with the request that the applicant's Appeal is based on facts and figures. His seniority may kindly be rectified.


District Director Agriculture
Extension D.I.Khan

Attested
Shankar

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
CAMP DERA ISMAIL KHAN

Misc. Application No. _____ / 2015

In Service Appeal No. 1095/2014

Muhammad Yousaf Versus Govt. of Khyber Pakhunkhwa and others

APPLICATION FOR RESTRAINING THE RESPONDENTS FROM FINALIZING THE TENTATIVE SENIORITY LIST OF OFFICE ASSISTANT AS IT STOOD ON 01-03-2015, ISSUED BY THE RESPONDENT NO. 2 VIDE NOTIFICATION NO. 15/54/A/ESTT:/4240-45/DG DATED PESHAWAR 02-03-2015 AND FROM PROMOTING ANYONE ON THE BASIS OF AFORESAID LIST TILL DISPOSAL OF THE MAIN SERVICE APPEAL.

Respected Sir,

1. That the appellant / applicant respectfully submits as under:-
2. That the appellant has already been filed the above titled appeal against the respondents regarding the seniority of the appellant which is pending adjudication before this Honourable Tribunal and is fixed today for submission of reply of the respondent's side.
3. That earlier the respondent No. 2 issued a Departmental Tentative Seniority List of Office Assistant vide notification No. 15/54/A/Estt:/1244-69/DG dated 12/01/2014, wherein the appellant/applicant was placed at serial No. 12 instead of serial No. 10, being aggrieved, the appellant/applicant filed above titled Service Appeal, now again the respondent No. 2, issued Tentative Seniority List dated 02-03-2015, in which the appellant/applicant kept in same position, the appellant/applicant also filed objection petition on the same Tentative List, which is annexed with this application.
4. That there is serious apprehension that respondents will promote anyone else on the basis of above said Seniority List, if they are not restrained by this Honourable Tribunal.
5. That the appellant/applicant has a legal character, locus standie and prima facie case and the balance of convenience is lying in his favour.

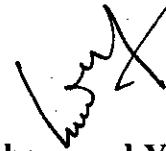
[Handwritten signature]

6. That if the instant application is not allowed the appellant /applicant will become prejudice and will suffer irreparable loss.

In view of above circumstances, this Honourable Tribunal will be pleased to restrain the respondents to not finalize the Tentative Seniority List of Office Assistant as it stood on 01-03-2015 vide letter No. 4240-45/DG dated Peshawar 02-03-2015, if it is finalized then this Honourable Tribunal will be further pleased to direct/restrain the respondent to not promote anyone else on the basis of said list till disposal of the main Service Appeal.

Dated: 31-03-2015

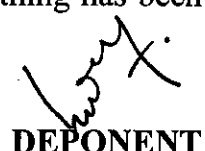
Your Humble
Applicant/Appellant



Muhammad Yousaf

AFFIDAVIT

I, **Muhammad Yousaf** S/o Abdus Sattar R/o Islamia Colony, Dera Ismail Khan, do hereby solemnly affirm and declare on oath that the contents of the application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



DEPONENT

Attd
7/2015 Commissioner
R.O. & *...*
Attested *A*



**OFFICE OF THE DISTRICT DIRECTOR AGRICULTURE
EXTENSION DERA ISMAIL KHAN**

Phone & Fax:0966-731399 E-Mail karimnawaz46@gmail.com

No. 1528 /DDA Dated D.I.Khan the 24/3 /2015



To The Director General Agriculture
Extension, Khyber Pakhtunkhwa,
Peshawar.

Subject:- **OBJECTION ON TENTATIVE SENIORITY LIST OF OFFICE ASSISTANT BPS-14
OF AGRICULTURE EXTENSION DEPARTMENT AS IT STOOD ON 01.03.2015
ISSUED BY YOUR WORTHY OFFICE VIDE NOTIFICATION
NO.15/54/A/ESTT/4240-45/DG DATED PESHAWAR 02.03.2015 WHICH
WAS COMMUNICATED TO THE PETITIONER VIDE OFFICE LETTER
NO.1457-61/DDA DATED DIKHAN THE 20.3.2015.**

Memorandum.

Enclosed please find herewith an Original application dated 24.3.2015 in
respect of Mr.Muhammad Yousaf, Office Assistant of this office on the subject cited
above for your kind information and further necessary action please.

Encl: As above.


DISTRICT DIRECTOR AGRICULTURE,
DERA ISMAIL KHAN

Endst.No. _____/DDA., Dated DIKhan the _____/2015.

Copy to:-

Mr.Muhammad Yousaf, Office Assistant of this office w/r to his application
dated 24.3.2015, for information.


DISTRICT DIRECTOR AGRICULTURE,
DERA ISMAIL KHAN

Attested
[Signature]

The Director General
Agriculture Extension
Govt. of Khyber Pakhtunkhwa
Peshawar.

THROUGH PROPER CHANEL

Subject: **OBJECTION ON TENTATIVE SENIORITY LIST OFFICE ASSISTANT BPS-14 OF AGRICULTURE EXTENSION DEPARTMENT AS STOOD ON 01-03-2015 ISSUED BY YOUR WORTHY OFFICE VIDE NOTIFICATION NO. 15/54-A/ESTT: 4240-45/DG DATED PESHAWAR 02-03-2015 WHICH WAS COMMUNICATED TO THE PETITIONER VIDE OFFICE LETTER NO. 1457-61/DDA DATED D.I.KHAN THE 20-03-2015.**

Respected Sir,

The petitioner humbly submits as under:-

1. That the petitioner was appointed as Office Assistant on 20-12-2005 whereas Muhammad Rafiq was appointed on 13-04-2007 and Imtiaz Hussain was appointed on 11-11-2008 but in above said tentative seniority list Muhammad Rafiq has been placed at serial No. 7 and Imtiaz Hussain has been shown at serial No. 8 and the petitioner has been kept at serial No. 9, whereas both of them are junior to the petitioner.
2. That in earlier seniority list Muhammad Rafiq and Imtiaz Hussain were illegally shown senior to the petitioner which seniority list has been challenged by the petitioner before the Service Tribunal Khyber Pakhtunkhwa Peshawar in Service Appeal No. 1095/2014, in which the comments has been called from the department and is pending adjudication before the worthy Service Tribunal.
3. That Service Appeal of the petitioner is pending before the worthy Service Tribunal on the same Seniority list therefore, it is requested that till disposal of the Service Appeal of the petitioner, no further final seniority list may be issued for the interest of justice even otherwise the above seniority list is also liable to be revised.

*Attested
Signature*

*It is therefore, requested that tentative seniority list 02-05
be finalized till decision of the worthy Service Tribunal or other
same list be rectified and be re-issued in which the name of petitioner
consider at serial No. 7 as he is senior to S. No. 7 & 8.*

Dated: 24/03/2015

Yours Humble Applicant



Muhammad Yousaf
Office Assistant
District Director Agriculture
Extension Dera Ismail Khan

*Attested
Shankar*



**OFFICE OF THE DISTRICT DIRECTOR AGRICULTURE
EXTENSION DERA ISMAIL KHAN**

Phone & Fax:0966-731399 E-Mail karimnawaz46@gmail.com

No. 145761/DDA Dated D.I.Khan the 20/3/2015



To 1-5) All Assistants of this office.

Subject:- **TENTATIVE SENIORITY LIST OF OFFICE ASSISTANT BPS-14 OF
AGRICULTURE EXTENSION DEPARTMENT AS IT STOOD ON 1.3.2015.**

Memorandum.

Enclosed please find herewith a copy of above subject vide issued
Director General Agriculture (Extension) KPK, Peshawar office Endst.No.4240-45/DG
dated 2.3.2015, received on this office on dated 19.3.2015 for information.

Encl: As above.

**DISTRICT DIRECTOR AGRICULTURE,
DERA ISMAIL KHAN**

Annex - D-1

20

DIRECTORATE GENERAL
AGRICULTURE (EXTENSION)
KHYBER PAKHTUNKHWA, PESHAWAR

Dated Peshawar: the 15/4 2014.

No.15/54-A/Estt/ 4933-96 /DG

In pursuance of Section-8 (1) of the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-17 of NWFP Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, Final Seniority list of Assistant (BS-14) of Agriculture Department (Extension Wing) as stood on 1.1.2014 is circulated.

S.No	Name of official with Academic qualification.	Designation.	Date of birth and Domicile	Date of 1st appointment	Regular appointment / promotion to the present post			present posting	Remarks	
					Date	BPS	Method of recruitment			
1.	Muhammad Alam	Matric	Assistant	5.2.58 Kurram Agy	19.6.76	31.12.2003	14	By promotion	AAO, Kurram Agy	
2.	Anees Ahmad	-do-	-do-	22.6.57 Charsadda	8.8.76	31.12.2003	14	By promotion	DDA, Peshawar	
3.	Aurangzeb	-do-	-do-	22.2.55 Peshawar	19.10.78	31.12.2003	14	By promotion	DA, FATA, Pesh.	
4.	Addur Razaq	B.A.	-do-	4.4.59 Karak	26.11.78	31.12.2003	14	By promotion	AAO, Orakzai Agy	
5.	Bahri Alam Jan	Matric	-do-	4.2.55 Charsadda	30.11.78	31.12.2003	14	By promotion	DA, FATA, Pesh.	
6.	Jan Pervaz	-do-	-do-	12.3.59 Charsadda	02.12.78	31.12.2003	14	By promotion	P, ATI, Pesh	
7.	Ihsanullah	-do-	-do-	11.5.59 Peshawar	01.09.80	31.12.2003	14	By promotion	DA, FATA, Pesh.	
8.	Ikramullah	Matric	-do-	15.02.62 Bannu	03.01.81	2.9.1991	14	By promotion	DA, (F) Pesh	
9.	Muhammad Aslam	F.A.	-do-	1.1.62 Lakki	19.1.83	31.12.2003	14	By promotion	DDA, Bannu	
10.	Muhammad Rafiq	M.A.	-do-	10.10.82 Moh. Agy	13.4.2007	13.4.2007	14	By promotion	AAO, Moh. Agy.	
11.	Imtiaz Hussain	B.A.	-do-	Tank	11.11.2008	11.11.2008	14	By promotion	DDA, Tank	
12.	Muhammad Yousaf	B.A.	-do-	01.04.1975 DIKhan	20.12.2005	19.11.2008	14	By promotion	Seniority maintained in light of order of DCO DIKhan vide No.13555-58 dt. 19.11.2008	
13.	Liaqat Ali	B.A.	-do-	21.04.58 Charsadda	14.9.80	24.01.2009	14	By promotion	DG's Office.	

Attested Shaukat

Attested Shaukat

14.	Sabir Khan	Matric	-do-	15.10.54 Mardan	11.3.74	24.1.2009	14	By promotion	DDA, Mardan
15.	Attaullah	Matric	Assistant	1.5.56 DIKhan	16.9.74	24.1.2009	14	By promotion	DDA, DIKhan
16.	Muhd Naseem	B.A.	-do-	12.1.60 Mansehra	3.10.78	24.1.2009	14	By promotion	DDA, Torghar
17.	Inayatullah	BA	-do-	7.1.1982 DIKhan	1.1.2009	1.1.2009	14	Direct	DDA, DIKhan
18.	Inamullah	B.A.	-do-	7.3.82 DIKhan	1.1.2009	1.1.2009	14	Direct	DDA, DIKhan
19.	Muhd Khurshid	B.A.	-do-	12.3.82 Abbottabad	23.4.2009	23.4.2007	14	Direct	DDA, A'Abad.
20.	Fazal Rehman	B.A.	-do-	3.4.1959 Swat	14.3.1979	25.1.2010	14	By promotion	DDA, Swat
21.	Abdul Rahim	D.Com	-do-	05.12.1957 Lakki Marwat	18.10.1978	28.10.2010	14	By promotion	DDA, Lakki
22.	Said Rawan	Matric	-do-	15.01.1960 Dir	14.03.1979	28.10.2010	14	By promotion	DDA, Upper Dir
23.	Muhammad Shah	B.A.	-do-	01.01.1957 Charsadda	17.06.1979	28.10.2010	14	By promotion	DA (F) Pesh
24.	Mursaleen	Matric	-do-	22.09.1959 Bajour Agency	20.11.1980	28.10.2010	14	By promotion	AAO, Bajour Agy
25.	Deedar Muhammad	Matric	-do-	14.04.1960 Nowshera	20.12.1980	28.10.2010	14	By promotion	DDA, Nowshera
26.	Murad Ali	Matric	-do-	26.3.1961 Mardan	28.12.1980	28.10.2010	14	By promotion	DDA (F) Pesh
27.	Asadud Din Asif Jah	B.A.	-do-	31.10.1971 Peshawar	25.1.2010	25.1.2010	14	Direct	Statistician CRS
28.	Sher Bad Shah	Matric	-do-	01.03.1956 Charsadda	07.02.1981	21.1.2011	14	By promotion	DDA (I) Pesh
29.	Muhammad Ishaq	Matric	-do-	9.6.1961 Mardan	21.2.1981	21.1.2011	14	By promotion	DG's Office
30.	Muhammad Ashiq	Matric	-do-	28.3.1957 Nowshera	22.2.1981	21.1.2011	14	By promotion	DG's Office
31.	Syed Ahmad Shah	F.A.	-do-	12.8.1960 Charsadda	22.2.1981	21.1.2011	14	By promotion	DDA, Charsadda
32.	Deedar Muhammad	B.A.	-do-	15.3.1957 Swabi	23.2.1981	21.1.2011	14	By promotion	DG's Office
33.	Muhammad Saeed	B.A.	-do-	15.2.1961 Peshawar	1.3.1981	21.1.2011	14	By promotion	DDA (F) Pesh
34.	Asadullah	M.A.	-do-	2.12.1984 Shangla	6.6.2012	6.6.2012	14	Direct	DDA, Shangla

Handwritten signature and initials

Official stamp

Attested
Shankar

35.	Muhammad Haseeb	B.Com	-do-	8.3.1991 Peshawar	6.6.2012	6.6.2012	14	Direct	DDA, Kohat
36.	Shabbir Ahmad	F.A.	Assistant	1.1.1959 Abbottabad	21.10.1978	29.10.2013	14	By promotion	DDA, Haripur
37.	Syed Hanif Shah	Matric	-do-	20.12.1959 Battagram	15.10.1980	29.10.2013	14	By promotion	DDA, Kohistan
38.	Faqir Hussain	Matric	-do-	1.1.1962 Peshawar	1.3.1981	29.10.2013	14	By promotion	DDA (FATA) Peshawar
39.	Muhammad Hayat	Matric	-do-	4.5.1959 Malakand	14.3.1981	29.10.2013	14	By promotion	DDA, Malakand
40.	Fazli Habib	B.A.	-do-	15.1.1963 Charsadda	17.3.1981	29.10.2013	14	By promotion	DDA, Peshawar
41.	Khan Zaman	Matric	-do-	12.8.1961 Lakki Marwat	19.3.1981	29.10.2013	14	By promotion	Principal, ATI, Peshawar
42.	Muhammad Sayyar	Matric	-do-	2.2.1959 Charsadda	18.4.1981	29.10.2013	14	By promotion	DDA (FATA) DIKhan
43.	Mohibullah	Matric	-do-	5.3.1954 Swabi	28.6.1981	29.10.2013	14	By promotion	DDA, Swabi
44.	Amir Nawaz	M.A.	-do-	6.2.1962 Peshawar	13.7.1981	29.10.2013	14	By promotion	DDA (Information) Peshawar

22

Endst. No. and date even.

Copy forwarded to :-

1. PS to Secretary to Government of Khyber Pakhtunkhwa, Agriculture, Livestock and Cooperation Department, Peshawar for information.
2. The Principal, Agricultural Training Institute, Peshawar.
3. The Director Agriculture, (FATA) Peshawar.
4. The Director Statistics, Crop Reporting Services, Peshawar.
5. The District Directors Agriculture, Bannu, Tank, DIKhan, Mardan, Torghar, Abbottabad, Swat, Lakki Marwat, Dir Upper, Nowshera, Charsadda, Shangla, Kohat, Haripur, Kohistan, Malakand and Swabi.
6. The Deputy Director of Agriculture (Information) Peshawar.
7. The officials at S.No.13, 29,30 and 32.

For information.

Sd/ DIRECTOR GENERAL
AGRICULTURE (EXTENSION)
KHYBER PAKHTUNKHWA, PESHAWAR

Attested
M. 4/2/19

RECEIVED
DIRECTOR GENERAL
AGRICULTURE (EXTENSION)
KHYBER PAKHTUNKHWA
PESHAWAR

Attested
M. 4/2/19
DIRECTOR GENERAL

Attested
Shamir

E 23

23

OFFICE OF THE DISTRICT DIRECTOR AGRICULTURE (EXTN;) DIKHAN.

NO: 2732 /DDA., dated DIKHAN the 3/7 /2014.

To :

The Secretary,
Govt: of Khyber Pakhtunkhwa
Agri: Livestock & Coop: Department
Peshawar.

Subject: DEPARTMENTAL APPEAL AGAINST THE ORDER OF THE
DIRECTOR GENERAL AGRI:EXTN; VIDE OFFICE ENDT:
NO. 15/54-A/ESTT/4933-96/DDA. DATED 15.4.2014

Memorandum.

Enclosed please find herewith an application /
departmental appeal (In-original) in respect of Mr. Muhammad
Yousaf, Office Assistant of this office for favour of
information and further necessary action please.

Encl: Original appeal
Dated 12.05.2014

[Signature]
DISTT: DIRECTOR AGRICULTURE
DERA ISMAIL KHAN.
[Signature]
13/5/14

*Attested
Shankar
San*

E-1

24

To

The Worthy Secretary
Government of Kyber Pakhtun Khawa,
Agriculture, Live Sock and Cooperatives
Peshawar.

Through Proper Channel

Subject: DEPARTMENT APPEAL AGAINST THE ORDER OF THE DIRECTOR GENERAL
AGRICULTURE EXTENSION VIDE OFFICE EDNST NO 15/54-A/ESTT/4933-96/DG
DATED: 15/04/2014.

Respected sir,

With profound respect, the appellant makes following submission for your kind perusal and gracious consideration.

1. That the appellant was appointed as Office Assistants (BPS-11) in the Office of District Office Agriculture (Extensions) vide order No 7260/ DCO (A & T) dated 20/12/2005, in such order para 2 was inadvertently mentioned regarding the temporary service was subsequently omitted /corrected by the honorable District coordination Officer through corrigendum vide No 13555-58 DCO (A & T) dated 19/11/2008, which was the continuation of the earlier order dated 20/12/2005.
2. That tentative seniority list was prepared by the worthy Director General Agriculture Extension vide his Officer Endst: 15/54-A/Estt/1244-69/DG dated 22/01/2014 Where in the appellant was placed at serial 12 instead of 10.
3. That the appellant being aggrieved from tentative seniority list submitted objection petition to the competent authority vide Endst No. 543/DDA, Dated 14/02/2014, which was not honoured and issued the final seniority list by placing the name of the appellant in the same position.
4. It is worth to mention that appellant also filed service appeal before service tribunal K.P,K against the tentative seniority list that was subsequently withdrawn being premature.
5. That the appellant obtained the final seniority list and being aggrieved from the said seniority list, the appellant being prefer this representation to your good self with the request to reconsider the final seniority list, as the appellant is senior from Muhammad Rafiq and Imtiaz Hussain who are placed at serial No. 10 & 11, in the seniority list while the appellant is kept on serial No. 12 which is against law and rules and is liable to be revised.
6. That the date of appointment of Muhammad Rafiq is 13/04/2007, while date of appointment of Imtiaz Hussain is 11/11/2008 whereas the date of appellant is 20/12/2005. The inter se-seniority list should be prepared form the date of their appointment, hence, the name of applicant had been wrongly placed in the impugned seniority list.

In lighted above, it is requested that placement of the applicant in the impugned seniority list may very kindly be reconsidered/ revised according to law and the quarter concerned may kindly be directed that my name may be placed at the proper place of the seniority list i.e serial no 10. Hope that my this representation will be considered sympathetically.

Dated: 12/05/2014

Your Obediently

(Muhammad Yousaf)
Office Assistant BPS-14
O/O the D.D.A (E)
D.I.Khan

1. Submitted in original to the D.D.A D.I.Khan for favourable consideration and on-word submission to quarter concerned please.

Received
12/5/14

(Muhammad Yousaf)
Office Assistant

Attested
Shamshad
ADN

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
CAMP DERA ISMAIL KHAN

Service appeal No. 1095/2014

Muhammad Yousaf Vs. Govt. of Khyber Pakhtunkhwa and others

REJOINDER TO THE COMMENTS FILED BY
RESPONDENT NO. 1, 2 & 3

The appellant respectfully submits his rejoinder as under:-

That all the preliminary objections raised by the respondents are immaterial, irrelevant and not sustainable in the case of the appellant as such vehemently denied.

Rejoinder to comments on facts:-

1. Comments referred in respect of para 1 of the facts is misconceived and irrelevant and the appellant reiterates the anerments mentioned in para No. 1 of the appeal.
2. Comments referred by the respondents on the para 2 of the appeal, is also misconceived, hence denied. The appellant reiterates the comments given in para 2 of the appellant.
3. Correct.
4. In response of para No. 4 of the comments, it is submitted that appellant was appointed as Office Assistant against vacant post, on regular basis, on 20-12-2005, whereas the respondents No. 5 & 6 were appointed as Office Assistant on 13-04-2007 & 11-11-2008 respectively. Hence they are wrongly shown as senior to the appellant in the seniority list and the respondents also erred in law to not consider the date of appointment of the appellant for his seniority. Hence comments of para No. 4 is incorrect.
5. Comments of para No. 5 is also incorrect. It is submitted that seniority given to the appellant from date of corrigendum is illegal and the appellant is competent and liable for seniority from his date of appointment i.e. 20-12-2005.
6. In response to the comments of para 6, it is submitted that Attaullah Khan challenged the tentative Seniority list before this Honourable Tribunal

instead of filing objection as such the said appeal is not maintainable and liable to be dismissed.

7. No comments as no comments has been offered by respondents to para No. 7 of the appeal.

Rejoinder to the comments on Grounds:-

- a) Incorrect, as the impugned seniority list is not maintained according to law and rules.
- b) Incorrect, as the letter of corrigendum dated 19-11-2008, is the continuation of the earlier order dated 20-12-2005 as such the appellant is competent and liable for his seniority from the date of his appointment i.e. 20-12-2005.
- c) Incorrect, seniority given to the appellant from the date of corrigendum instead of date of appointment is illegal and liable to be rectified and revised.
- d) Incorrect, the appellant reiterates the overments of ground No. a.

In view of above circumstances it is humbly prayed that impugned seniority list may be set aside and direct the respondents to issue revised seniority list and place the appellant as senior from the Private respondents.

Appellant


Muhammad Yousaf

Dated: 28-04-2015

VERIFICATION

Verified that the contents of the rejoinder are true and correct to the best of my knowledge.

Dated : 28-04-2015


Muhammad Yousaf

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
CAMP DERA ISMAIL KHAN

Service appeal No. 1095/2014

Muhammad Yousaf Vs. Govt. of Khyber Pakhtunkhwa and others

REJOINDER TO THE COMMENTS FILED BY
RESPONDENT NO. 1, 2 & 3

The appellant respectfully submits his rejoinder as under:-

That all the preliminary objections raised by the respondents are immaterial, irrelevant and not sustainable in the case of the appellant as such vehemently denied.

Rejoinder to comments on facts:-

1. Comments referred in respect of para 1 of the facts is misconceived and irrelevant and the appellant reiterates the anerments mentioned in para No. 1 of the appeal.
2. Comments referred by the respondents on the para 2 of the appeal, is also misconceived, hence denied. The appellant reiterates the comments given in para 2 of the appellant.
3. Correct.
4. In response of para No. 4 of the comments, it is submitted that appellant was appointed as Office Assistant against vacant post, on regular basis, on 20-12-2005, whereas the respondents No. 5 & 6 were appointed as Office Assistant on 13-04-2007 & 11-11-2008 respectively. Hence they are wrongly shown as senior to the appellant in the seniority list and the respondents also erred in law to not consider the date of appointment of the appellant for his seniority. Hence comments of para No. 4 is incorrect.
5. Comments of para No. 5 is also incorrect. It is submitted that seniority given to the appellant from date of corrigendum is illegal and the appellant is competent and liable for seniority from his date of appointment i.e. 20-12-2005.
6. In response to the comments of para 6, it is submitted that Attaullah Khan challenged the tentative Seniority list before this Honourable Tribunal

instead of filing objection as such the said appeal is not maintainable and liable to be dismissed.

7. No comments as no comments has been offered by respondents to para No. 7 of the appeal.

Rejoinder to the comments on Grounds:-

- a) Incorrect, as the impugned seniority list is not maintained according to law and rules.
- b) Incorrect, as the letter of corrigendum dated 19-11-2008, is the continuation of the earlier order dated 20-12-2005 as such the appellant is competent and liable for his seniority from the date of his appointment i.e. 20-12-2005.
- c) Incorrect, seniority given to the appellant from the date of corrigendum instead of date of appointment is illegal and liable to be rectified and revised.
- d) Incorrect, the appellant reiterates the overments of ground No. a.

In view of above circumstances it is humbly prayed that impugned seniority list may be set aside and direct the respondents to issue revised seniority list and place the appellant as senior from the Private respondents.

Appellant


Muhammad Yousaf

Dated: 28-04-2015

VERIFICATION

Verified that the contents of the rejoinder are true and correct to the best of my knowledge.

Dated : 28-04-2015


Muhammad Yousaf

ANEX C

16

TENTATIVE SENIORITY LIST OF OFFICE ASSISTANT BS-14 OF AGRICULTURE EXTENSION DEPARTMENT AS STOOD ON 1.1.2014.

S.No	Name of official with Academic qualification.		Designation.	Date of birth and Domicile	Date of 1st appointment	Regular appointment / promotion to the present post			present posting	Remarks
						Date	BPS	Method of recruitment		
1.	Muhammad Alam	Matric	Assistant	5.2.58 Kurram Agy	19.6.76	31.12.2003	14	By promotion	AAO, Kurram Agy	
2.	Anees Ahmad	-do-	-do-	22.6.57 Charsadda	8.8.76	31.12.2003	14	By promotion	DDA, Peshawar	
3.	Aurangzeb	-do-	-do-	22.2.55 Peshawar	19.10.78	31.12.2003	14	By promotion	DA, FATA, Pesh.	
4.	Addur Razaq	B.A.	-do-	4.4.59 Karak	26.11.78	31.12.2003	14	By promotion	AAO, Orakzai Agy	
5.	Bahri Alam Jan	Matric	-do-	4.2.55 Charsadda	30.11.78	31.12.2003	14	By promotion	DA, FATA, Pesh.	
6.	Jan Pervaz	-do-	-do-	12.3.59 Charsadda	02.12.78	31.12.2003	14	By promotion	P, ATI, Pesh	
7.	Ihsanullah	-do-	-do-	11.5.59 Peshawar	01.09.80	31.12.2003	14	By promotion	DA, FATA, Pesh.	
8.	Ikramullah	Matric	-do-	15.02.62 Bannu	03.01.81	29.1991	14	By promotion	DA, (F) Pesh	
9.	Muhammad Aslam	F.A.	-do-	1.1.62 Lakki	19.1.83	31.12.2003	14	By promotion	DDA, Bannu	
10.	Muhammad Rafiq	M.A.	-do-	10.10.82 Moh. Agy	13.4.2007	13.4.2007	14	Direct	AAO, Moh. Agy.	
11.	Imtiaz Hussain	B.A.	-do-	Tank	11.11.2008	11.11.2008	14	Direct	DDA, Tank	
12.	Muhammad Yousaf	B.A.	-do-	01.04.1975 DIKhan	20.12.2005	19.11.2008	14	Direct	Seniority maintained in light of order of DCO DIKhan vide No.13555-58 dt. 19.11.2008	
13.	Liaqat Ali	B.A.	-do-	21.04.58 Charsadda	14.9.80	24.01.2009	14	By promotion	DG's Office.	
14.	Sabir Khan	Matric	-do-	15.10.54 Mardan	11.3.74	24.1.2009	14	By promotion	DDA, Mardan	
15.	Attaullah	Matric	Assistant	1.5.56 DIKhan	16.9.74	24.1.2009	14	By promotion	DDA, DIKhan	
16.	Muht-Naseem	B.A.	-do-	12.1.60 Mansehra	3.10.78	24.1.2009	14	By promotion	DDA, Torghar	

ATTACHED
Shankar

Es: [Signature]

16

17.	Inayatullah	BA	Assistant	7.1.1982 DIKhan	1.1.2009	1.1.2009	14	Direct	DDA, DIKhan	
18.	Inamullah	B.A.	-do-	7.3.82 DIKhan	1.1.2009	1.1.2009	14	Direct	DDA, DIKhan	
19.	Muhd Khurshid	M.Sc.	-do-	12.3.82 Abbottabad	23.4.2009	23.4.2007	14	Direct	DDA, A'Abad.	
20.	Fazal Rehman	B.A.	-do-	3.4.1959 Swat	14.3.1979	25.1.2010	14	By promotion	DDA, Swat	
21.	Abdul Rahim	D.Com	-do-	05.12.1957 Lakki Marwat	18.10.1978	28.10.2010	14	By promotion	DDA, Lakki	
22.	Said Rawan	Matric	-do-	15.01.1960 Dir	14.03.1979	28.10.2010	14	By promotion	DDA, Upper Dir	
23.	Muhammad Shah	B.A.	-do-	01.01.1957 Charsadda	17.06.1979	28.10.2010	14	By promotion	DA (F) Pesh	
24.	Mursaleen	Matric	-do-	22.09.1959 Bajour Agency	20.11.1980	28.10.2010	14	By promotion	AAO, Bajour Agy	
25.	Deedar Muhammad	Matric	-do-	14.04.1960 Nowshera	20.12.1980	28.10.2010	14	By promotion	DDA, Nowshera	
26.	Murad-Ali	Matric	-do-	26.3.1961 Mardan	28.12.1980	28.10.2010	14	By promotion	DDA (F) Pesh	
27.	Sher Bad Shah	Matric	-do-	01.03.1956 Charsadda	07.02.1981	21.1.2011	14	By promotion	DDA (I) Pesh	
28.	Muhammad Ishaq	Matric	-do-	9.6.1961 Mardan	21.2.1981	21.1.2011	14	By promotion	DG's Office	
29.	Muhammad Ashiq	Matric	-do-	28.3.1957 Nowshera	22.2.1981	21.1.2011	14	By promotion	DG's Office	
30.	Syed Ahmad Shah	F.A.	-do-	12.8.1960 Charsadda	22.2.1981	21.1.2011	14	By promotion	DDA, Charsadda	
31.	Deedar Muhammad	B.A.	-do-	15.3.1957 Swabi	23.2.1981	21.1.2011	14	By promotion	DG's Office	
32.	Muhammad Saeed	B.A.	-do-	15.2.1961 Peshawar	1.3.1981	21.1.2011	14	By promotion	DDA (F) Pesh	
33.	Asadullah	M.A.	-do-	2.12.1984 Shangla	6.6.2012	6.6.2012	14	Direct	DDA, Shangla	
34.	Muhammad Haseeb	B.Com	-do-	8.3.1991 Peshawar	6.6.2012	5.6.2012	14	Direct	DDA, Kohat	

Attested
Shahid

35	Shabbir Ahmad	F.A.	Assistant	1.1.1959 Abbotabad	21.10.1978	29.10.2013	14	By promotion	DDA, Haripur
36	Syed Hanif Shah	Matric	-do-	20.12.1959 Baltagram	15.10.1980	29.10.2013	14	By promotion	DDA, Kohistan
37	Faqir Hussain	Matric	-do-	1.1.1962 Peshawar	1.3.1981	29.10.2013	14	By promotion	DDA (FATA) Peshawar
38	Muhammad Hayat	Matric	-do-	4.5.1959 Malakand	14.3.1981	29.10.2013	14	By promotion	DDA, Malakand
39	Fazli Habib	B.A.	-do-	15.1.1963 Charsadda	17.3.1981	29.10.2013	14	By promotion	DDA, Peshawar
40	Khan Zaman	Matric	-do-	12.8.1961 Lakki Marwat	19.3.1981	29.10.2013	14	By promotion	Principal, ATI, Peshawar
41	Muhammad Sayyar	Matric	-do-	2.2.1959 Charsadda	18.4.1981	29.10.2013	14	By promotion	DDA (FATA) DIKhan
42	Mohibullah	Matric	-do-	5.3.1954 Swabi	28.6.1981	29.10.2013	14	By promotion	DDA, Swabi
43	Amir Nawaz	M.A.	-do-	6.2.1962 Peshawar	13.7.1981	29.10.2013	14	By promotion	DDA (Information) Peshawar

Sd/-DIRECTOR GENERAL
AGRICULTURE (EXTENSION)
KHYBER PAKHTUNKHWA, PESHAWAR

Dated Peshawar the 22-01-2014

No.15/54-A/Estt/ 1244-69 /DG

Copy forwarded to: -

01/13/15

1. PS to Secretary to Government of Khyber Pakhtunkhwa, Agriculture, Livestock and Cooperation Department, Peshawar for information.
2. The Principal, Agricultural Training Institute, Peshawar.
3. The Director Agriculture, (FATA) Peshawar.
4. The Director Statistics, Crop Reporting Services, Peshawar.
5. The District Directors Agriculture, Bannu, Tank, DIKhan, Mardan, Torghar, Abbotabad, Swat, Lakki Marwat, Dir Upper, Nowshera, Charsadda, Shangla, Kohat, Haripur, Kohistan, Malakand and Swabi.
6. The Deputy Director of Agriculture (Information) Peshawar.
7. The officials at S.No.13, 29.30 and 32.

For information and necessary action. You are advised to furnish deficiency i.e. date of birth, domicile, qualification etc of the officials concerned to this office within 30 days positively.

*Attended
Shankar*

22/01/2014
DIRECTOR GENERAL