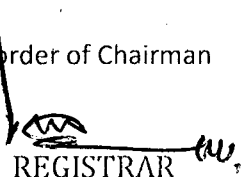


Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1355/2022 _____


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/09/2022	<p>The appeal of Mr. Barakat Ullah resubmitted today by Mr. Jalal-ud-Din Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Barkat Ullah son of Muhammad Zaman Mali Support Complex Lakki Marwat received today i.e. on 15.09.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Pay slip mentioned in para-2 of the memo of appeal is not attached with the appeal which may be placed on it.
- 3- Annexure-D of the appeal is incomplete which may be completed.
- 4- Page nos. 15 & 41 of the appeal are illegible which may be replaced by legible/better one.
- 5- One more of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2572 /S.T,


Dt. 16/09 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Jalaluddin Adv. Pesh.

Sr
19/09/22

The memorandum of appeal is properly signed, Pay slip has been removed/erased, Annexure -D regarding appeal in complete form- Page 15 and 41 Better copy of complete appeal is also Place on file, Hence The appeal is Re-submitted for finalisation Please.


Advocate

BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No...../2022

1355/2022

Barakat Ullah

VERSUS

Govt of Khyber Pukhtunkhwa & others

I N D E X

S.No	Documents	Annexure	Pages
1.	Grounds of Appeal along with affidavit		1-5
2	Application for interim relief alongwith affidavit		6
3.	Addresses of parties		7
4	Copy of CNIC & Educational testimonial	A	8-9
5.	Copy of appointment letters	B	10
6.	Copy of Service Structure rules dated 29.04.2019	C	11-14
7	Copy of order dated 17.11.2020 of promotion	D	15
8.	Copy of representations	E	16
9.	Copy of W.P.No.2676/2021 and order dated 28.06.2022	F & G	17-24
10.	Copy of Application, dairy No's and letter dated 22.07.2022	H & H/1	25-26
11.	Copy of orders	I	27-41
12	Wakalatnama		42

THROUGH

APPELLANT

**JALAL-UD-DIN
ADVOCATES, HIGH COURT
PESHAWAR**

**MUHAMMAD ALAM KHAN
ADVOCATE &**

**REHMAT KUNDI
Advocate Peshawar
Flat No.16, Second Floor, Al-
Syed Plaza, Abdara Chowk
University Road, Peshawar.
Cell # 0333-9216527**

BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 1355/2022

Barakat Ullah S/o Muhammad Zaman as Mali;
Presently Posted as Mali Sport Complex Lakki Marwat,
R/o Mohallah Ghafoor Khel Abba Khel Lakki Marwat**APPELLANT**

VERSUS

1. Govt of Khyber Pukhtunkhwa
through Chief Secretary, Civil Secretariat KP Peshawar.
2. **The Secretary** to Government of Khyber Pakhtunkhwa, Ministry of
Sports and Youth Affairs, Civil Secretariat Peshawar.
3. **The Director General Sports, Khyber Pukhtunkhwa,**
Directorate of Sports Complex, Peshawar Cantt Peshawar
4. **The Director Youth Affairs,**
Khyber Pukhtunkhwa, Plot No.28, Sector E-8,
Phase-VII, Hayatabad Peshawar.....**RESPONDENTS.**

**APPEAL UNDER SECTION 4 OF THE SERVICES TRIBUNAL ACT, 1974,
AGAINST THE RESPONDENTS, WHEREBY THE APPELLANT HAS NOT
BEEN PROMOTED TO BPS-11 AND AGAINST THE ILLEGAL ACTION OF
THE RESPONDENTS, THE APPELLANT FILED WRIT PETITION
NO.2676/2021 BEFORE THE HON'ABLE PESHAWAR HIGH COURT
PESHAWAR WHICH HAS BEEN DISPOSED OF WITH THE DIRECTIONS
TO THE RESPONDENTS TO CONSIDER THE DEPARTMENTAL
REPRESENTATION OF THE APPELLANT AND DECIDE IN ACCORDANCE
WITH LAW AND RULES ON THE SUBJECT WITHIN A PERIOD OF TWO
MONTHS HOWEVER, IF, GRIEVANCE OF THE APPELLANT HAS NOT
REDRESSED BY THE RESPONDENTS THEN IN THAT EVENTUALLY
THE APPELLANT MAY APPROACH THE COMPETENT COURT OF LAW
VIDE JUDGMENT DATED 28.06.2022 BUT DESPITE EXPIRY OF TWO
MONTHS PERIOD, THE RESPONDENTS FAILED TO DECIDE AND
COMMUNICATE THE FATE OF THE REPRESENTATION OF THE
APPELLANT IN THE LIGHT OF THE JUDGMENT/ORDER IN
W.P.NO.2676/2021, WHICH ACTION OF THE RESPONDENTS ARE
ILLEGAL, UNLAWFUL AND IN EFFECTIVE UPON THE RIGHT OF THE
APPELLANT AND THE SAME MAY PLEASE BE DECLARED AS NULL AND
VOID AND THE APPELLANT MAY PLEASE BE PROMOTED ON THE BASIS
OF SENIORITY CUM FITNESS IN ACCORDANCE WITH LAW AND RULES,
REGULATIONS WITH THE ALL BACK BENEFITS.**

RESPECTFULLY SHEWETH.

1. That appellant is the Citizens of Pakistan having domiciled of Khyber Pukhtunkhwa and have qualified of F.A. **(Copy of CNIC & educational testimonial are annexed as A).**
2. That the appellant was initially appointed as class-IV Mali on 28.06.2010, in the Directorate of Sports Khyber Pukhtunkhwa, Sports Complex Lakki Marwat and during the services, the appellant has improved his qualification as mentioned above. **(Copy of appointment letters/pay slip of appellant is annexed as B).**

- (2)
3. That since the appointment of the appellant, he is working as member and staff of Directorate of Sports, which is under the control of Ministry of Sports, Culture, Tourism, Archaeology and Youth Affairs Department, Civil Secretariat, Peshawar.
 4. That the Government of Khyber Pukhtunkhwa, Sports, Tourism, Archaeology and Youth Affairs department through a Notification Bering No.SO(Sports)1-8/2019/S.Rule dated 29.04.2019, notified rules of the method of recruitment, qualifications and other conditions specified in Column No.3 to 5 of the appendix to the notification, applicable to the posts in the Directorate General of Sports, as specified in column No.2 of the said appendix. **(Copy of the Services structure rules of the Directorate Of Sports is annexed as C).**
 5. That the Directorate of Youth Affairs, who is also under the control of Ministry of Sports, Culture, Tourism, Archaeology and Youth Affairs Department, Civil Secretariat, Peshawar, and governed under the same rules/services Structure have promoted class-IV employees of the Directorate to the post of Junior Clerk (BPS-11) on regular basis with immediate effect vide office order No.DYA/ Admin/promotion /2020/1635-38 dated 17.11.2020. **(Copy of the order dated 17.11.2020 of promotion is annexed as D).**
 6. That the appellant being also beneficial from the said rules/services structure for promotion of class-IV employees, has also submitted his joint representation to the respondents/DG Sports Khyber Pukhtunkhwa on dated 29.01.2021 but no response and no fruitful result. **(Copy of the representation are annexed as E).**
 7. That thereafter, the appellant filed Writ Petition No.2676-P/2021 before the Hon'able Peshawar High Court Peshawar, wherein notices were issued to the respondents for filing of their written comments, hence after filing of comments, the Hon'able Peshawar High Court Peshawar hard the parties and disposed off the Writ Petition with the directions to the respondents to decide the appellant and others representation in accordance with law and rules on the subject within a period of two months from the date of receipt of the copy of this order, however, if grievance of the appellant is not redressed by the respondents then in that eventuality, he may approach the competent Court of law vide order and Judgment dated 28.06.2022. **(Copy of the Grounds of W.P.No.2676-P/2021 and order dated 28.06.2022 is annexed as F & G).**
 8. That the order and Judgment dated 28.06.2022 of the Hon'able Peshawar High Court Peshawar has been submitted by the appellant alongwith other through joint application to the respondent No.3 through dairy No.357-17/QSL-class-IV dated 05.07.2022 and the same has been forwarded to the competent authority by the respondents on 22.07.2022 but despite lapsed of stipulated period of two months, the respondents failed to decide the fate of the representation of the appellant as per directions in the Judgment and order dated 28.06.2022 of Hon'able Peshawar High Court Peshawar. **(Copy of application dated 05.07.2022, dairy receiving No and letter dated 22.07.2022 are annexed as H to H/1).**
 9. That the appellant being aggrieved from the non-consideration of the representation in the light of Judgment and order of Hon'able Peshawar High Court, Peshawar and by not promoting the appellant by the respondents, the appellant is approached this Hon'able Tribunal on the following ground inter alia:-

GROUNDS :-

3

- a. That the action and inaction of the respondents for not considering the appellant for promotion on the basis of seniority as well as not to decide the departmental representation in the light of the directions of the Hon'able Peshawar High Court Peshawar within stipulated period of two months, is void-ab-initio, arbitrary, without jurisdiction, Coram-non-judice, illegal and without any lawful authority hence untenable in eye of law and the appellant is liable to be promoted on the basis on seniority and qualification under the rules with all back benefits.
- b. That the appellant having the accrued right for promotion on the basis of seniority to junior clerks BPS-11 in the light of Doctrine accrued rights and legitimate expectancy but the said rights have been violated by the respondents and the appellant has been deprived from the said rights hence the appellant is entitled for the secured and guaranteed rights in accordance with rules dated 29.04.2019.
- c. That appellant has been deprived from the legal rights which are clear violation of Article 4 of Constitution of the Islamic republic of Pakistan 1973.
- d. That the Directorate of Youth Affairs vide order date 17.11.2020 has promoted similarly placed class-IV employees from BPS-3 to BPS-11 as per services structure rules which is meant for staff of both the directorate but the respondent/directorate of Sports despite verbal as well as written representations has deprived the appellant from their fundamental and Constitutional rights as guaranteed in the Constitution of Islamic republic of Pakistan 1973.
- e. That respondent/Director of Youth Affairs is under the control of Ministry of Sports, Culture, Tourism, Archaeology and Youth Affairs department, Civil Secretariat, Peshawar and the services structure / rules is also applicable to the staff of both the Directorates but the respondent No.3/Director General Sports violating the same by not considering the appellant under the quota meant for promotion from class-IV to Junior Clerk-BPS-11 and thus the appellant is being discriminated.
- f. That as per rules dated 29.04.2019, the appellant having the requisite qualifications and experience for the posts of junior clerk BPS-11 and non-considering of the case for promotion is in utter disregard of law, rules, regulations and service structure as well.
- g. That the law and rules guarantees equal treatment but the appellant being at par with and similarly placed employees of the Directorate of Youth Affairs, has been discriminated. Reliance is placed on **2009 SCMR page-1**.
- h. That Article-4 of the Constitution of Islamic Republic of Pakistan 1973, commands that all the citizens without any discrimination shall be dealt in accordance with the law and rules, so enforcement of the law leaves no room for creating any distinction or discrimination between the citizen who having equal footing.
- i. That Article-4 and 8 of the Constitution of Islamic Republic of Pakistan 1973, makes it clear that deviation from law has not to be countenanced, this is an assurance to the people of Pakistan that people of authority shall treat them in accordance with law and each one is bound by these stipulations of the Constitution of Islamic Republic of Pakistan, 1973.
- j. That by not promoting the appellant is also in utter violation of Article-25 of the Constitution of Islamic Republic of Pakistan 1973.

- (4)
- k. That the functions and nature of job / work of the appellant is at par with other employees of the Directorate of Youth Affairs, which is under the control of one and the same Ministries of Sports, Culture, Tourism, Archaeology and Youth Affairs department, is clear discrimination on one hand and on the other hand is clear violation of the provision of the Constitution of Islamic Republic of Pakistan 1973 and rule applicable to the matter of the appellant.
- l. That under the same rules dated 29.04.2019, the respondents-department had fulfilled 67% of initial recruitment quota and on the other hand, the promotion of the appellant of 33% has been delayed and refused by not deciding the representation of the appellant which clear violation of the law and rules hence the appellant is also discriminated on this score alone.
(Copy of the order annexed as I).
- m. That under section 21 and section 24-A of the General Clauses Act, once a rights has been extended and created to the individual through a proper manner by the competent authority, then no one has power to undo it, and on this score alone, the appellant is entitled for the promotion as per rules on the basis of seniority cum fitness to Junior Clerk BPS-11 with all back benefit.
- n. That the respondents by not promoting the appellant on the basis of seniority cum fitness is also against the norms of natural justice and fair play and of directions of the apex Court in different judgments and the respondents have make mockery of his policy by itself as well as the rules on the subject matter.
- o. That in the peculiar facts and circumstances of the case, the interference of this Hon'able Tribunal is warranted under the Law.
- p. That any other ground would be adduced by Appellant during arguments on the instant appeal with the permission of this Hon' able Tribunal.

It is, therefore, most humbly prayed that on acceptance of this appeal:-

- 1. Non-Consideration of the appellant for promotion for on basis of seniority cum fitness to Junior Clerk BPS-11 in accordance with the services structure rules is in utter violation of law, rules, regulations, fundamental rights and Constitution of Islamic Republic of Pakistan, 1973 and may please be declared as such.***
- 2. Appropriate directions may kindly be issued to the respondents-department to treat the appellant at par with the employees of the Directorate of Youth Affairs, who, are similar with the appellant and are already promoted under the same service structure rules, under the control of one and the same Ministry and Governed under the same rules, regulations and same service structure rules.***
- 3. Appropriate directions may kindly be issued to the respondents-department to promote the appellant to BPS-11 in view of service structure rules and notification dated 29.04.2019 as the Appellant having the requisite qualification and experience for the promotion to BPS-11 on the basis of Seniority Cum fitness with all back benefits.***

4. Any other relief which is deem proper and not specifically asked by the Appellants may be pleased be granted to the Appellant in the circumstances.

THROUGH

APPELLANT
Jalalud-Din

JALAL-UD-DIN
ADVOCATES, HIGH COURT
PESHAWAR

MUHAMMAD ALAM KHAN
ADVOCATE &

REHMAT KUNDI
Advocate Peshawar

AFFIDAVIT:-

I, **Barakat Ullah** S/o Muhammad Zaman as Mali, Presently Posted as Mali Sport Complex Lakki Marwat, R/o Mohallah Ghafoor Khel Abba Khel Lakki Marwat do hereby solemnly affirm and declare on Oath that the contents of the instant services appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Hon' able Tribunal.

IDENTIFY BY
Jalalud-Din
JALAL-UD-DIN
Advocate

برکت
DEPONENT
ATTESTED

[Signature]
14/09/022



15

~~Annexure D~~

38 149 20

**DIRECTORATE OF YOUTH AFFAIRS
KHYBER PAKHTUNKHWA**
Plot No.28 Sector E-8 Phase-VII Hayatabad, Peshawar
Dated Peshawar, the 17th November, 2020

OFFICE ORDER:

No. DY/Admn/Promotion/2020/1635-38

Consequent upon the recommendation of the Departmental Promotion Committee the following Class-IV (BPS-03) of this Directorate are hereby promoted to the post of Junior Clerk (BPS-11) on regular basis with immediate effect.

Annexed-D

S.#	Name of Incumbent
1.	Asif Ullah
2	Faiz Ullah
3	Hidayat Ullah
4.	Naveed Alam
5	Umar Khan
6	Qadeer Khan
7	Nazir Yousaf

On their promotion, they are hereby posted/transferred against the vacant post of Junior Clerk (BPS-11) at the station noted against them in the interest of public service.

S.#	NAME OF INCUMBENT	PLACEMENT
1	Mr Asif Ullah Mali (BPS-03) District Youth Office Tank	Junior Clerk (BPS-11), at District Youth Office Tank against the vacant post.
2	Mr Faiz Ullah Mali (BPS-03) District Youth Office, Karak	Junior Clerk (BPS-11), at District Youth Office Karak against the vacant post
3	Mr Hidayat Ullah Chowkidar (BPS-03) District Youth Office Lakki Marwat	Junior Clerk (BPS-11), at District Youth Office Bannu against the vacant post
4	Mr Naveed Alam Mali (BPS-03) District Youth Office Lakki Marwat	Junior Clerk (BPS-11), at District Youth Office Lakki Marwat against the vacant post.
5	Mr. Umar Khan Mali (BPS-03) District Youth Office, Charsadda	Junior Clerk (BPS-11), at District Youth Office Charsadda against the vacant post
6	Qadeer Khan Naib Qasid (BPS-03) District Youth Office, Nowshera	Junior Clerk (BPS-11), at District Youth Office Nowshera against the vacant post.
7	Nazir Yousaf, Chowkidar (BPS-03). District Youth Office, Chitral	Junior Clerk (BPS-11), at District Youth Office Chitral against the vacant post

Note: -Promotion of the official is also subject to the following terms and conditions

They will be on probation for a period of one year in terms of Section 6 (2) of the Khyber Pakhtunkhwa Civil Servants Act 1973 read with Rules-15(1) of Khyber Pakhtunkhwa Civil Servants (Appointment Promotion and Transfer) Rules 2013

TESTED

(16) پختونخواہ کی سپورٹس خیر محنتوں کو انیسٹار

D.No. 80-17/P...
Date... 29...
Directorate General of Sports
KPK Peshawar Cantt

پختونخواہ کی سپورٹس خیر محنتوں کو انیسٹار
بھارتی سپورٹس بورڈ کے لیے درخواست
(AMF) Annexed-E
جناب عالی

مؤدبانہ التماس ہے کہ ہم جملہ ملازمین درجہ چارہم
نائب قائد / عالی / چوکیدار آپ صاحبان کی خدمت میں عرض
کرا رہے ہیں کہ ہم لوگوں نے مورفہ 06/2019 کو ایک درخواست آپ
صاحبان کی خدمت میں پیش کی تھی اس کے بعد دوسری درخواست مورفہ
04/03/2020 کو لکھی گئی تھی اس کے بعد یہ تیسری درخواست آپ کی خدمت میں
پیش کی جا رہی ہے لیکن یہ قسمتی ہے اس التجا پر غور نہیں کیا جا رہا
جبکہ وہ سے ہم زبانی اذیت کا شکار ہیں کہ ہماری پروموشن کی جائے
اس سلسلے میں ہماری آپ صاحبان سے ایک مرتبہ پھر التجا ہے
کہ ان کی پروموشن کے لیے سروس رولرز کے تحت کر کے مشکور فرمائیں
تا کہ درجہ چارہم کے ہمارے سب نصابیوں کا کام جلدی ہو جائے آپ
صاحبان سے گزارش ہے کہ ہماری اس التجا پر غور فرمائیں۔
آپ کی عین نوازش ہوگی۔

الغرض

- 1) نعیم اکبر
- 2) عامر شہزاد
- 3) محمد آصف
- 4) محمد ساجد
- 5) احمد فرید
- 6) محمد بلال
- 7) نثار احمد
- 8) ملنگ جان
- 9) بركت اللہ
- 10) عثمان شاہ
- 11) ضیاء الرحمن
- 12) محمد بلال
- 13) محمد شہزاد
- 14) محمد ذوالفقار
- 15) محمد علی

17

1



BEFORE THE HONOURABLE PESHAWAR HIGH COURT, PESHAWAR

W.P No. 2676 P of 2021 .

Annexed - F

1. Mr. Zia Ur Rehman S/O Aziz Ur Rehman as Mali.
2. Mr. Usman Shah S/O Rahat Shah as Chokidar.
3. Mr. Malang Jan S/O Bakhtiar Khan as Mali.
4. Mr. Muhammad Saleem S/O Bayaz Khan as Mali.
5. Mr. Aamir Shahzad S/O Muhammad Arif as Watchman.
6. Mr. Barakat Ullah S/O Muhammad Zaman as Mali.
7. Mr. Muhammad Bilal S/O Muhammad Basheer as Mali.
8. Mr. Muhammad Asif S/O Fazal Wahid as Mali.
9. Mr. Nisar Ahmad S/O Mir Zarkam Shah as Chowkidar.
10. Mr. Muhammad Sajid S/O Aziz Ur Rehman as Mali.
11. Mr. Amjid Farid S/O Siraj ud Din as Chowkidar.
12. Mr. Muhammad Bilal S/O Muhammad Yaseen as Naib Qasid.
13. Naeem Akbar S/O Saleem Akbar as Mali.

All employees / members of Directorate of Sports Khyber Pakhtunkhwa,
Peshawar Sports Complex, Peshawar

.....PETITIONERS

VERSUS

1. The Government of Khyber Pakhtunkhwa through its Chief Secretary, Civil Secretariat, Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Ministry of Sports and Youth Affairs, Civil Secretariat, Peshawar.
3. Director General Sports, Directorate of Sports Khyber Pakhtunkhwa, Peshawar Sports Complex, Peshawar Cantt, Peshawar.
4. Director Youth Affairs, Khyber Pakhtunkhwa, Plot No. 28, Sector E - 8, Phase VII, Hayatabad, Peshawar

..... RESPONDENTS

Registrar
2021

**WRIT PETITION UNDER ARTICLE
199 OF THE CONSTITUTION OF**

ATTESTED
EXAMINER
Peshawar High Court

ISLAMIC REPUBLIC OF PAKISTAN, 1973.

Respectfully Sheweth:

The petitioners submit as under,

1. That the petitioners are the citizens of Pakistan, domiciled of KPK, have the qualification of SSC, F.A/F.Sc etc have been appointed as class IV in the years 2007, 2008, 2009 and 2010 in the directorate of sports Khyber Pakhtunkhwa, Peshawar Sports Complex, Peshawar Cantt, Peshawar. Some of the petitioners have improved their qualification during their service. (Copy of testimonials and appointments orders are annexed as Annexure A/ A ___ And B/B ___)
2. That since the appointment of the petitioners, they are working as members and staff of directorate of sports which is under the control of Ministry Of Sports, Culture, Tourism, Archaeology and Youth Affairs Department, Civil Secretariat, Peshawar.
3. That the Government of Khyer Pakhtunkhwa, Sport, Toursim, Archeaology, Museum and Youth Affairs Department, through Notification bearing NO. SO(Sports) 1 – 8 / 2019 / S. Rules dated 29/04/2019 notified rules of the method of recruitment, qualifications and other conditions specified in column NO 3 to 5 of the appendix to the notification, applicable to the posts in the Directorate General of Sports, as specified in Column No 2 of the said appendix. (Copy of the rules / service structure of the Directorate General Sports is annexed as C)

RE-FILED COPY
Deputy Registrar
28 JUN 2021

ATTESTED
EXAMINER
Peshawar High Court



Dated Peshawar, the 29/04/2019

NOTIFICATION

Amended-c

No.SO(Sports)1-8/2019/S.Rules :- In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of all previous Notifications, issued in this behalf, the Sports, Culture, Tourism, Youth Affairs, Archaeology and Museums Department, in consultation with the Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualifications and other conditions specified in Column Nos. 3 to 5 of the Appendix to this Notification, which shall be applicable to the posts in the Directorate General of Sports, as specified in Column No. 2 of the said Appendix:

APPENDIX

S.No.	Nomenclature of post.	Minimum qualification for appointment by initial recruitment.	Age limit.	Method of recruitment.
1.	2.	3.	4.	5.
1.	Director General (BPS-20).			By promotion, on the basis of seniority-cum-fitness, from amongst the Directors (BPS-19), having two (2) years' service in BPS-19 and seventeen (17) years service in BPS-17 and above: Provided that if no suitable officer is available for promotion then by transfer from amongst the PAS/PMS/PCS officers.

*W. Mansoor
29.04.2019
3370*

12

18.	Supervisor (BPS-15).	At least Second Division Intermediate Certificate or its equivalent qualification from a recognized Board, with Junior Diploma in Physical Education.	20 to 32 years.	(a) Ten per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Hostel Superintendents (BPS-10) with three (03) years service as such; and (b) ninety per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Caretakers (BPS-08) and Store Keepers (BPS-08) with two (02) years service as such. Note: For the purpose of promotion, a joint seniority list of Care Takers and Store Keepers shall be maintained.
19.	Stenographer (BPS-14).	(a) At least Second Division Intermediate Certificate or its equivalent qualification from a recognized Board with- (b) speed of fifty (50) words per minute in shorthand in English and thirty-five (35) words per minute in typing; and (c) knowledge of Computer in using MS Word and MS Excel.	18 to 30 years.	By initial recruitment.
20.	Senior Clerk (BPS-14).		-	By promotion, on the basis of seniority-cum-fitness, from amongst the Junior Clerks (BPS-11) with at least two years' service as such.
21.	Junior Clerk (BPS-11).	At least Second Division Intermediate Certificate or its equivalent qualification from a recognized Board with a speed of thirty (30) words per minute in typing.	18 to 30 years.	(a) Thirty-three per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Naib Qasids (BPS-03), Chowkidars (BPS-03), Security Guards (BPS-03), Watchmen (BPS-03), Malies' (BPS-03), Ground-men (BPS-03), Cleaners (BPS-03), Conductors (BPS-03), including holders of other equivalent posts in the Directorate General of Sports

Handwritten signature and date:
S. A. NAWA 2
19.04.2019

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				<p>having at least two years' service as such who have passed Intermediate Examination; and</p> <p>(b) sixty-seven per cent by initial recruitment.</p> <p>Note: For the purpose of promotion, a joint seniority list of Najb Qasids, Chowkidars, Security Guards, Watchmen, Malies, Ground-men, Cleaners, Conductors, including holders of other equivalent posts in the Directorate General of Sports shall be maintained:</p> <p>Provided that if two or more officials have acquired the Intermediate Certificate in the same session, the inter se seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post and where a senior official does not possess the requisite qualification at the time of filling of a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials:</p> <p>Provided further that where a senior official does not possess the requisite qualification at the time of filing of a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials.</p>
22.	Junior Squash Coach/Junior Coach (BPS-10).	At least Second Division Secondary School Certificate or its equivalent qualification from a recognized Board, with three (3) years' experience as Coach in the relevant games before or after Secondary School Certificate; and	25 to 40 years.	By initial recruitment.

Wajahat
25.04.2019
SAJIB NAWAZ

14

33.	Conductor (BPS-03).	Preferably literate.	18 to 40 years.	By initial recruitment.
34.	Sweeper (BPS-03).	Literate.	18 to 40 years.	By initial recruitment.


sd/x
Secretary to Government of Khyber Pakhtunkhwa
Sports, Tourism, Archaeology, Museums &
Youth Affairs Department

Endst: No. No.SO(Sports)1-8/2019/S.Rules:

Copy forwarded to the:-

- 1) All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
- 2) Secretary to Governor Khyber Pakhtunkhwa.
- 3) Principal Secretary to Chief Minister Khyber Pakhtunkhwa.
- 4) Accountant General Khyber Pakhtunkhwa.
- 5) Director General Sports, Khyber Pakhtunkhwa Peshawar.
- 6) Secretary Public Service Commission Khyber Pakhtunkhwa Peshawar.
- 7) Registrar Peshawar High Court / Service Tribunal Peshawar.
- 8) All Regional Sports Officers / District Sports Officers. Khyber Pakhtunkhwa.
- 9) Manager Government Stationary & Printing Department.
- 10) PS to Chief Secretary Khyber Pakhtunkhwa Province.
- 11) PS to Secretary Sports Department Khyber Pakhtunkhwa Peshawar.
- 12) PA to Additional Secretary Sports Department Khyber Pakhtunkhwa Peshawar.
- 13) Office Order File.

Dated Peshawar, the 29/04/2019 :


29-04-2019
(Sajid Nawaz)
Section Officer Sports

6

C.M.No...../2022

In

Service Appeal No...../2022

Barkat Ullah

VERSUS

Govt of Khyber Pukhtunkhwa & others

APPLICATION FOR INTERIM RELIEF TO THE EFFECT THAT THE RESPONDENTS ARE DIRECTED NOT TO TAKE ANY ADVERSE ACTIONS AGAINST THE APPLICANT/APPELLANT AND ALSO NOT FILL UP THE VACANT POSTS TILL DECISION OF THE MAIN SERVICES APPEAL.

RESPECTFULLY SHEWETH:-

1. That the above titled appeal has been filed before this Hon'able Tribunal and yet no date of hearing has been fixed.
2. That the contents of the main appeal be considered as integral part of the instant application because the applicant/appellant have a good prima facie case and sanguine about his success of the appeal.
3. That balance of convenience and inconvenience also lies in favor of applicant/appellant.
4. That if, the temporary injunctions has not been granted to the applicants, then the applicant will suffer irreparable loss.

It is, therefore, most humbly prayed that, on acceptance of this application, the interim relief as prayed in the heading of the instant application may please be granted in favor of the applicant/appellant against the respondents till decision of the main appeal.

THROUGH

APPLICANT

**JALAL-UD-DIN
ADVOCATES, HIGH COURT**

**MUHAMMAD ALAM KHAN
ADVOCATE &**

**REHMAT KUNDI
Advocate Peshawar**

AFFIDAVIT:-

I, **Barakat Ullah** S/o Muhammad Zaman as Mali, Presently Posted as Mali Sport Complex Lakki Marwat, R/o Mohallah Ghafoor Khel Abba Khel Lakki Marwat do hereby solemnly affirm and declare on Oath that the contents of the instant services application are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Hon' able Tribunal.

IDENTIFY BY
JALAL-UD-DIN
Advocate HIGH COURT
PESHAWAR

DEPONENT

ATTESTED
14/09/2022

Service Appeal No...../2022

Barakat Ullah

VERSUS

Govt of Khyber Pukhtunkhwa & others

ADDRESSES OF PARTIES

APPELLANT.

Barakat Ullah S/o Muhammad Zaman as Mali,
Presently Posted as Mali Sport Complex Lakki Marwat,
R/o Mohallah Ghafoor Khel Abba Khel Lakki Marwat

RESPONDENTS.

1. Govt of Khyber Pukhtunkhwa
through Chief Secretary, Civil Secretariat KP Peshawar.
2. **The Secretary** to Government of Khyber Pakhtunkhwa, Ministry of
Sports and Youth Affairs, Civil Secretariat Peshawar.
3. **The Director General Sports, Khyber Pukhtunkhwa,**
Directorate of Sports Complex, Peshawar Cantt Peshawar
4. **The Director Youth Affairs,**
Khyber Pukhtunkhwa, Plot No.28, Sector E-8, Phase-VII, Hayatabad
Peshawar

THROUGH

APPELLANT'S
برکت

Jalal-ud-Din
**JALAL-UD-DIN
ADVOCATES, HIGH COURT
PESHAWAR**

Muhammad Alam Khan
MUHAMMAD ALAM KHAN

Rehmat Kundi
ADVOCATE &

**REHMAT KUNDI
Advocate Peshawar**

8

Annexed - A

حکومت پاکستان

قومی شناختی کارڈ

11201-1576841-1



نام: برکت اللہ

جنس: مرد

والد کا نام: محمد زمان

شناختی علامت: کوئی نہیں

عثمان یوسف مبین
تاریخ پیدائش: 20/05/1986

دستخط حامل کارڈ

دستخط رجسٹرار جنرل

شناختی نمبر: 11201-1576841-1 خاندان نمبر: T1Y6VT

موجودہ پتہ: محلہ بٹنور خیل، ابا خیل، تحصیل و ضلع لکی مروت



مستقل پتہ: ایضاً



تاریخ اجراء: 12/09/2016 تاریخ ترمیم: 12/09/2026

گمشدہ کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں

9

Annexed 8-A

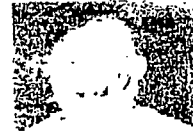
S.No. BU 18413

Roll No. 7738

Revised



18



Board of Intermediate and Secondary Education
Bannu Khyber Pakhtunkhwa Pakistan
**HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION
SESSION 2010 (SUPPLEMENTARY)**

Annex-A-9

HUMANITIES GROUP

Verified
[Signature]
Incharge Officer (QW/S)
Board of Intermediate & Secondary
Education Bannu

To Certify that Barkat Ullah

Muhammad Zaman

Son of

appeared as Private candidate of Lakki Marwat

has passed the **INTERMEDIATE EXAMINATION**

held in the month of October, 2010. The Examination was taken in part

He obtained 546 marks out of 1100 and has been placed in Grade D

Representing Fair

Registration No. 19733-Pvt-1-09

Date of declaration of Result: 03-01-2011

Presented on 03-12-2020

TESTED

[Signature]
Asst. Secretary

[Signature]
Secretary

This certificate is issued without alteration or erasure.

Annexed - B

8/9

31

OFFICE OF THE DISTRICT COORDINATION OFFICER LAKKI MARWAT

OFFICE ORDER

Consequent upon the recommendations of District Selection Committee dated 25/02/2010 Mr Barkatullah S O Muhammad Zaman s/o Village Abba Khel (Tals) & District Lakki Marwat is hereby appointed as Mali on temporary basis against the newly created Post in the Office of the District Sports Office Lakki Marwat with immediate effect.

TERMS & CONDITIONS

- 1- His appointment is purely temporary and is liable to be terminated any time without any reason being assigned.
2. In case of his resignation, he will have to give 14 days notice in advance or else of his one month pay will be forfeited.
3. His appointment will be subject to the Medical fitness by the Medical Superintendent DHQ Hospital Lakki Marwat.
4. He shall be governed by the Govt of Khyber Pakhtunkhwa, Civil Servants Efficiency and Disciplinary Rules-1973.
5. According to Section-19 of the Civil Servants Act-1973, he will not be entitled to pensionary and gratuity benefits.
6. He will be entitled of the benefit of contributing provident fund.
7. No TA/DA is allowed to the appointee for joining his duties.
8. The appointee will take over the charge of the Post within 15 days after issue of this order, otherwise, their appointment will be automatically considered as cancelled.

If he accepts the offer, he shall report for duty in the Office of the District Sports Officer, Sports Stadium Lakki Marwat on 16/7/2010.

(District Coordination Officer)
Lakki Marwat

NO. 1468-72 DSCO/LM/DSE/Sports Dated 25/6 2010
Copy forwarded to the :-

1. Director Sports, Govt of Khyber Pakhtunkhwa, Peshawar w/r to his letter NO.17/QSC/2009, dated 17/4/2010 for information.
2. The District Accounts Officer, Lakki Marwat.
3. The Medical Superintendent DHQ Hospital Lakki Marwat.
4. The District Sports Officer, Lakki Marwat for information & necessary action.
5. ✓ The Official Concerned.

(District Coordination Officer)
Lakki Marwat

TESTED

4. That the Directorate of Youth Affairs, who is under the control of Ministry of Sports, Culture, Tourism, Arohaeology and Youth Affairs Department, Civil Secretariat, Peshawar, and governed under the same rules / service structure (annexure C) have promoted class IV employees of the Directorate to the post of Junior Clerk (BPS 11) on regular basis with immediate effect vide office order No. *DYA/Admin/Promotion/2020/1635-38* dated 17/11/2020. (copy of the office order is Annexure D)

5. that the petitioners have also submitted their joint representation to the respondents / DG Sport Khyber Pakhtunkhwa dated 29/01/2021 but no response till now. (copy of the representation is annexed as E)

6. That the petitioners having no other adequate remedy, invoke the constitutional jurisdiction of this honourable court for appropriate writ / direction for the relief / prayers on the following grounds inter alia;

GROUND

A. That it is constitutional duty of each and every authority in Pakistan to exercise its power fairly, justly and transparently but the respondents have the same.

B. That the Director Youth Affairs vide office order (Annexure E) has promoted similarly placed Class IV from BPS 3 to BPS 11 as per service structure (Annexure D) which is meant for staff of both the directorates but the respondent / Director Sports despite several verbal requests as well as written applications has deprived the petitioner from their fundamental and constitutional rights as guaranteed in Chapter I of Part II of the Constitution of Islamic Republic of Pakistan, 1973.

RE-FILED TODAY
Deputy Registrar
28 JUN 2021

ATTESTED
EXAMINER
Peshawar High Court

4

20

- C. That respondent / Directorate Youth Affairs is under the control of Ministry Sports, Culture, Tourism, Archaeology and Youth Affairs Department, Civil Secretariat, Peshawar and the service structure / rules (Annexure D) is also applicable to the staff of both the directorates but the respondent / Directorate General Sports violating the same by not considering the petitioners under the quota meant for promotion from class IV to Junior Clerk (BPS11) and thus the petitioners are being discriminated.
- D. That the petitioners are qualified, having the requisite qualifications and experience for the posts of Junior Clerk (BPS 11) and non consideration of their case and not promoting them to the post of BPS 11, is in utter violation of the law, rules, regulations and service structure.
- E. That the Constitution guarantees equal treatment but the petitioner being at par with and similarly placed employees of the Directorate Youth Affairs, have been discriminated.
- F. That Article-4 of the constitution of Islamic Republic of Pakistan, 1973, commands that all the citizens without any discrimination shall be dealt in accordance with the law, so enforcement of the law leaves no room for creating any distinction or discrimination between the citizens.
- G. That Articles-4 & 8 of the constitution of Islamic Republic of Pakistan, 1973, makes it clear that deviation from law has not to be countenanced: this is an assurance to the people of Pakistan that people in authority shall treat them in accordance with law and each one is bound by these stipulations of the constitution of Islamic Republic of Pakistan, 1973.
- That the action and inactions of respondents / Department is also in utter violation of Article-25 of the constitution of Islamic Republic of Pakistan, 1973.

FILED TODAY
Deputy Registrar
EXAMINER
Peshawar High Court
24 JUN 2021

5

- I. That the function and nature of job / work of the petitioners is at par with other employees of Directorate of Youth Affairs, which is under the control of one and the same Ministry of Sports, Culture, Tourism, Archaeology and Youth Affairs Department, is clear discrimination on one hand and on the other hand is clear violation of the provision of Constitution of Islamic Republic of Pakistan, 1973.
- J. That any, additional ground, with leave of the honourable court, will be argued at the time of final hearing of the petition.

Prayer:

It is, therefore, humbly requested that on acceptance of this writ

petition:-

- i) Non consideration of the Petitioners for promotion to BPS 11 in accordance with the service structure (annexure D), is in utter violation of the law, rules, regulations, fundamental rights and Constitution of Islamic Republic of Pakistan, 1973 may please be declared as such.
- ii) Appropriate writ / direction to the respondent / department to treat the petitioner at par with the employees of the Directorate Youth Affairs, who, are like the petitioners, under the control of one and the same Ministry and governed under the same rules, regulations and service structure.
- iii) An appropriate writ / direction to the respondent / department to promote the petitioners to BPS 11 in view of Service structure as the petitioners having the requisite qualifications / experience.
- iv) That any other direction / writ, deem appropriate by this honourable court, in fact and circumstance of the case, may also be granted in favor of petitioners against respondents / departments.

DUJAY
Registrar
1/2021

ATTESTED
EXAMINER
Peshawar High Court

6

22

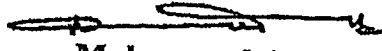
INTERIM RELIEF:

In the meanwhile, by way of interim relief, respondents be directed not to take any adverse action against the petitioners.

The petitioners also pray for any other relief as this honourable court deems fit and appropriate to grant in the interest of justice in the circumstances of the case.

Through,

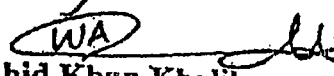
Petitioners



Muhammad Anwar



Inamullah Alizai



Wahid Khan Khalil



Afshan Hussain

Advocates High Courts

Dated: June 24, 2021.

List of Books / laws:

- The Constitution of Islamic Republic of Pakistan, 1973.
- Service Laws
- Service Structure of Directorate General of Sports, KPK.
- Relevant law / book.


ADVOCATE

FILED TODAY
Deputy Registrar
24 JUN 2021

ATTESTED
EXAMINER
Peshawar High Court

7

28

IN THE HONOURABLE PESHAWAR HIGH COURT, PESHAWAR

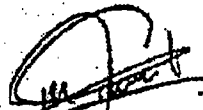
W.P No: 26767 of 2021


Mr. Zia Ur Rehman & Others
VERSUS
Govt of Khyber Pakhtunkhwa & Others


AFFIDAVIT

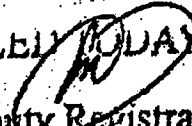
I, Zia Ur Rehman S/O Aziz Ur Rehman R/O Prang, Yaseenzai, Charsadda, do hereby solemnly affirm and declare on oath that the contents of the Writ Petition are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Court.

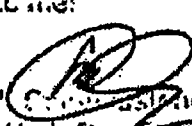
Identified by:


Amullah Alizai
Advocate, Peshawar


DEPONENT
CNIC: 17101-8535123-1 ✓
Cell No: 0313-9989118


CERTIFIED TO BE TRUE
By the Court Clerk, Peshawar
The District Registrar's Office


Deputy Registrar
24 JUN 2021

No. <u>28692</u> Certified that the above was verified on solemnly affirmation before me on this <u>16</u> day of <u>June</u> <u>2021</u> at <u>Prang, Charsadda</u> who was identified to me by <u>Amullah Alizai</u> who is present and known to me. Off.  Registrar, Peshawar. <u>18/06/2021</u>	04 JUL 2022
---	-------------

At a distance verified 18/06/2021

24



**PESHAWAR HIGH COURT PESHAWAR
ORDER SHEET**

Annexed-6

Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or that of parties or counsel where necessary
1	2
28.06.2022	<p><u>Writ Petition No. 2676-P/2021 with IR.</u></p> <p>Present: Mr. Jalal-ud-Din, advocate for the petitioners.</p> <p>Mr. Rab Nawaz Khan, Addl. AG for the respondents.</p> <p>*****</p> <p><u>LAL JAN KHATTAK, J.-</u> As the petitioners' representation is pending before the competent authority for decision thereon, therefore, this writ petition is disposed of with direction to the respondents-department to decide the petitioners' representation in accordance with law and rules on the subject within a period of two months from the receipt of copy of this order, however, if grievance of the petitioners is not redressed by the respondents then in that eventuality they may approach the competent Court of law.</p>
<p>42908</p> <p>Representation of Application 30-6-22</p> <p>10/7</p> <p>4-7-22</p> <p>Preparation of Copy 4-7-22</p> <p>Delivery of Copy 4-7-22</p> <p>10/7</p>	<p><i>L. Jan</i> JUDGE</p> <p><i>M. Ibr</i> JUDGE</p> <p>CERTIFIED TO BE TRUE COPY</p> <p>04 JUL 2022</p>

To, The Director General Sports,
Khyber Pukhtunkhwa, Directorate of Sports,
Peshawar Sports Complex Peshawar Cantt.

25

Amended - H

SUB: PROVISION FOR THE JUDGMENT AND ORDER DATED 28.06.2022 IN WRIT PETITION NO.2676-P/2021 TITLED AS ZIA UR REHMAN AND 12 OTHERS... VERSUS... THE GOVERNMENT OF KP & OTHERS FOR DECISION ON THE REPRESENTATION ON PROMOTION OF THE CLASS-IV EMPLOYEES TO JUNIOR CLERK (BPS-11).

D.No. 357-17/952 class-iv
Date 05/07/2022
Directorate General of Sports
KPK, Peshawar Cantt

Respected Sir,

Enclosed please find herewith the Judgment and order of the Hon'able Peshawar High Court Peshawar in W.P.No.2676-P/2021 on the titled mentioned above for decision of the representation for promotion of the class-IV employees mentioned in the above titled writ petition to Junior Clerk (BPS-11) under the law and rules on the subject thereof. The Judgment and grounds of the writ petition is attached which is self explanatory on the subject. Further the relevant rules of 2019 on the subject is also attached herewith.

APPLICANTS.

1. Zia Ur Rehman S/o Aziz Ur Rehman *Zia Ur Rehman*
2. Usman Shah S/o Rahat Shah *Usman Shah*
3. Malang Jan S/o Bakhtar Khan *Malang Jan* 05/07/2022
4. Muhammad Saleem S/o Bayaz Khan *Saleem*
5. Amir Shahzad S/o Muhammad Arif *Amir*
6. Barqat Ullah S/o Muhammad Zaman *Barqat Ullah*
7. Muhammad Bilal S/o Muhammad Bashir *M. Bilal*
8. Muhammad Asif S/o Fazal wahid *Muhammad Asif* 05/07/2022
9. Nisar Ahmad S/o mir zakam Khan *Nisar Ahmad*
10. Muhammad Sajid S/o Aziz Ur Rehman *Sajid*
11. Amjid farid S/o Siraj Uddin *Amjid farid*
12. Muhammad Bilal S/o Muhammad Yaseen *Muhammad Bilal* 05/07/2022
13. Naeem Akbar S/o saleem Akbar *Naeem Akbar*

26

Amended - H/1



GOVERNMENT OF KHYBER PAKHTUNKHWA
SPORTS, CULTURE, TOURISM, ARCHAEOLOGY, MUSEUMS
& YOUTH AFFAIRS DEPARTMENT

(Sports Section)

No. SO (Sports) 1-7/ PSB/DPC/2022/31-5

Dated Peshawar the 22nd July, 2022

To

The Director General Sports,
Khyber Pakhtunkhwa,
Peshawar.

No. 538-17/Promotion
Date 27/7/22
Director General of Sports
KPK, Peshawar

Subject: - PROVISION FOR THE JUDGEMENT AND ORDER DATED 28-06-2022 IN WRIT PETITION NO. 2676-P/2021 TITLED AS ZIA-UR-REHMAN AND 12 OTHERS, VERSUS THE GOVERNMENT OF KP & OTHERS FOR DECISION ON THE REPRESENTATION ON PROMOTION OF THE CLASS-IV EMPLOYEES TO JUNIOR CLERK (BPS-11)

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of application dated 'Nil' submitted by Zia-ur-Rehman & others along-with Peshawar High Court Order Sheet dated 28-06-2022 for compliance, under intimation to this department.

2. Being a court matter may be treated as most urgent, please.

Yours faithfully,

[Signature]
22-7-22

Section Officer (Sports)

Encl: As above

Copy to the:

1. Section Officer (Litigation), Sports Department, Peshawar.
2. PS to Secretary, Sports Department, Peshawar.
3. PA to AS-II, Sports Department, Peshawar.
4. PA to DS-I, Sports Department, Peshawar.

[Signature]
22-7-22

Section Officer (Sports)

ORDER:

No.17/Seniority List/Q.S.
Promotion & Transfer) F
Khyber Pakhtunkhwa is l

FINAL

Total sanctioned posts:

S.#	Name and Designation of the Official
1.	Javed Khan, J/Clerk at DSO Tank
2.	Sijad Khan, J/Clerk at DSO Mansehra
3.	Ayaz Khan, J/Clerk at DSO Nowshera
4.	Gran Muhammad, J/Clerk at DSO Charsadda
5.	Ijaz-ul-Haq, J/Clerk at DSO Karak
6.	Abdul Wahid, J/Clerk at DSO Chitral (Lower
7.	Salma.Khalid, J/Clerk, at Provincial Head Quarter

3.	Ayaz Khan, Senior Clerk (BPS-14)	District Sports Office, Nowshera	Against the vacant post of Senior Clerk (BPS-14)
4.	Gran Muhammad, Senior Clerk (BPS-14)	District Sports Office, Charsadda	Against the vacant post of Senior Clerk (BPS-14)
5.	Ijaz-ul-Haq, Senior Clerk (BPS-14)	District Sports Office, Karak	Retained on the post of Senior Clerk (BPS-14)
6.	Abdul Wahid, Senior Clerk (BPS-14)	District Sports Office, Chitral (Upper)	Posted against the vacant post of Computer Operator (BPS-16) in OPS
7.	Salma Khalid, Senior Clerk (BPS-14)	Directorate General of Sports Khyber Pakhtunkhwa	Against the vacant post of Senior Clerk (BPS-14)
8.	Gullam, Senior Clerk (BPS-14)	Regional Sports Office, Bannu	Retained on the post of Senior Clerk (BPS-14)
9.	Abdul Rahim Khan, Senior Clerk (BPS-14)	District Sports Office, Bannu	Posted against the vacant post of Assistant (BPS-16) in OPS

(Contd...P/2)

31

S. #	NAME OF OFFICIAL	PLACE OF POSTING	REMARKS
10.	Mrs. Saiqa Bibi, Senior Clerk (BPS-14)	District Sports Office, Mardan	Against the vacant post of Senior Clerk (BPS-14)
11.	Muhammad Yasir, Senior Clerk (BPS-14)	District Sports Office, Tank	Posted against the vacant post of Computer Operator (BPS-16) in OPS.
12.	Jahan Zeb Khan, Senior Clerk (BPS-14)	District Sports Office, Kohistan (Upper)	Against the vacant post of Senior Clerk (BPS-14)
13.	Mushtaq Ahmad, Senior Clerk (BPS-14)	District Sports Office, Bannu	Against the vacant post of Senior Clerk (BPS-14)
14.	Gulshan Iqbal, Senior Clerk (BPS-14)	District Sports Office, Karak	Against the vacant post of Senior Clerk (BPS-14)
15.	Yasir Khan, Senior Clerk (BPS-14)	District Sports Office, Swabi	Against the vacant post of Senior Clerk (BPS-14)
16.	Ijaz Ullah, Senior Clerk (BPS-14)	District Sports Office, Lakki Marwat	Retained on the post of Assistant (BPS-16) at Lakki Marwat in OPS
17.	Muhammad Noman, Senior Clerk (BPS-14)	District Sports Office, Abbottabad	Posted against the vacant post of Computer Operator (BPS-16) in OPS
18.	Rozi Malk, Senior Clerk (BPS-14)	District Sports Office, Buner	Against the vacant post of Senior Clerk (BPS-14)
19.	Muhammad Faheem Khan, Senior Clerk (BPS-14)	District Sports Office, D.I Khan	Against the vacant post of Senior Clerk (BPS-14)

The services of the above promoted Senior Clerks (BPS-14) will be on probation for a period of one year as provided under section-6 (2) of Civil Servants Act, 1973.

Sd-
DIRECTOR GENERAL

Endst. No. & Date even

Copy forwarded for information and necessary action to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Regional Sports Officer, D.I. Khan, Abbottabad, Bannu, Peshawar, Kohat, Mardan & Swat.
3. District Accounts Officer, D.I. Khan, Abbottabad, Nowshera, Charsadda, Karak, Chitral (Upper), Chitral (Lower), Manshira, Bannu, Mardan, Tank, Kohistan (Upper), Swabi, Lakki Marwat & Buner.
4. District Sports Officer, D.I. Khan, Abbottabad, Nowshera, Charsadda, Karak, Chitral (Upper), Chitral (Lower), Manshira, Bannu, Mardan, Tank, Kohistan (Upper), Swabi, Lakki Marwat & Buner.
5. Director (Operation) o/o DG Sports Khyber Pakhtunkhwa, Peshawar.
6. Section Officer (Sports), Sports and Youth Affairs Department, Khyber Pakhtunkhwa.
7. Assistant Director (Accounts) o/o D.G Sports Khyber Pakhtunkhwa.
8. PA to DG Sports, o/o DG Sports, Khyber Pakhtunkhwa.
9. Officials concerned.

20/05/2022
ASSISTANT DIRECTOR (HQ)

32

Sports are essential for the development of a happy, healthy & vigorous society

DIRECTORATE GENERAL OF SPORTS
KHYBER PAKHTUNKHWA

PESHAWAR SPORTS COMPLEX, PESHAWAR CANTT.
Ph: # 9212767, Fax # 9212766

29

Dated Peshawar, the 14th of May, 2019

OFFICE ORDER:

No.17/Promotion/QSC/PSB/18.- In pursuance of the recommendation of the Departmental Promotion Committee, the following Tubewell Operators, Plumbers, Electricians & Generator Operators in BPS-03 of the Directorate General of Sports are hereby promoted to the rank of Care Takers/ Store Keepers (BPS-08) respectively with immediate effect: -

1. Mr. Yousaf Khan, Plumber Provincial H.Q
2. Mr. Wali Khan, Tube Well Operator Provincial H.Q
3. Mr. Fahim Hussain, Electrician, Provincial H.Q
4. Mr. Salman Babar, Tube Well Operator Provincial H.Q
5. Mr. Sabir Rehman, Electrician, Provincial H.Q
6. Mr. Farzand Ali, Electrician, Provincial H.Q
7. Mr. Salem Khan, Generator Operator Provincial H.Q
8. Mr. Arshad Ishfaq, Electrician, Provincial H.Q
9. Mr. Mehar Alam, Electrician, Provincial H.Q
10. Mr. Amjad Iqbal, Plumber, Provincial H.Q

Their services will be on probation for a period of one year in terms of Section 6(2) of Khyber Pakhtunkhwa Civil Servants Act. 1973. Consequent upon their promotion, they are posted against the vacant posts of Care Takers/ Store Keepers (BPS-08) mentioned below against each:-

S. #	NAME & DESIGNATION OF THE OFFICIAL	PLACE OF POSTING
1.	Mr. Yousaf Khan, Care Taker (BPS-08)	Directorate General of Sports Khyber Pakhtunkhwa
2.	Mr. Wali Khan, Care Taker (BPS-08)	Office of the Regional Sports Officer, Mardan
3.	Mr. Fahim Hussain, Care Taker (BPS-08)	Office of the District Sports Officer, Swabi
4.	Mr. Salman Babar, Care Taker (BPS-08)	Office of the Regional Sports Officer, Kohat
5.	Mr. Sabir Rehman, Store Keeper (BPS-08)	Directorate General of Sports Khyber Pakhtunkhwa
6.	Mr. Farzand Ali, Care Taker (BPS-08)	Directorate General of Sports Khyber Pakhtunkhwa
7.	Mr. Salem Khan, Care Taker (BPS-08)	Office of the Regional Sports Officer, Charsadda
8.	Mr. Arshad Ishfaq, Care Taker (BPS-08)	Office of the Regional Sports Officer, Swabi
9.	Mr. Mehar Alam, Care Taker (BPS-08)	Office of the District Sports Officer, Swat
10.	Mr. Amjad Iqbal, Care Taker (BPS-08)	Directorate General of Sports Khyber Pakhtunkhwa

DIRECTOR GENERAL

Dated 14-05-2019

No. 17/Promotion/QSC/PSB/18

Copy forwarded for information and necessary action to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director (Operation) o/o D.G Sports Khyber Pakhtunkhwa, Peshawar.
3. Section Officer (Sports), Sports and Youth Affairs Department, Khyber Pakhtunkhwa, Peshawar.
4. Assistant Director (Accounts) o/o Director General Sports Khyber Pakhtunkhwa, Peshawar.
5. Regional Sports Officer Mardan & Kohat.
6. District Sports Officer Swat, Charsadda & Swabi.
7. District Accounts Officer Mardan, Kohat, Swat, Charsadda & Swabi.
8. Officials concerned.

DIRECTOR GENERAL

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Sports are essential for the development of a happy, healthy & vigorous society

DIRECTORATE GENERAL OF SPORTS

KHYBER PAKHTUNKHWA
PESHAWAR SPORTS COMPLEX, PESHAWAR CANTT.
Ph# 9212767 Fax# 9212766

28

Dated Peshawar, the 21st May, 2019

OFFICE ORDER:

No.17/Promotion/QSC/PSB/19.- In pursuance of recommendation of the Departmental Promotor Committee (DPC) in its meeting held on 08-05-2019, the following Junior Squash Coach, Junior Coaches (BPS-10) are hereby promoted to the posts of Coaches (BPS-16) against the existing posts in the Directorate General of Sports Khyber Pakhtunkhwa and Abdul Wali Khan Sports Complex Charsadda on acting charge basis under Rule-9(1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules-1989 with immediate effect:-

1. Mr. Shah Faisal.
2. Mr. Munawar Zaman.
3. Mr. Muhammad Nouman.
4. Mr. Muhammad Zubair.
5. Mr. Pervez Khan.
6. Mr. Nadeem Khan.
7. Mr. Faisal Javed.

Consequent upon their promotion, they are posted against the existing vacant post of Coaches (BPS-16) mentioned below against each:-

S. #	NAME	PLACE OF POSTING
1.	Mr. Shah Faisal	Martial Art Coach in the Directorate General of Sports Khyber Pakhtunkhwa.
2.	Mr. Munawar Zaman	Squash Coach, Abdul Wali Khan Sports Complex, Charsadda.
3.	Mr. Muhammad Nouman	Tennis Coach, Abdul Wali Khan Sports Complex, Charsadda
4.	Mr. Muhammad Zubair.	Body Building / Weight Lifting Coach, Abdul Wali Khan Sports Complex, Charsadda.
5.	Mr. Pervez Khan	Cricket Coach, Abdul Wali Khan Sports Complex, Charsadda.
6.	Mr. Nadeem Khan.	Badminton Coach, Abdul Wali Khan Sports Complex, Charsadda.
7.	Mr. Faisal Javed	Football Coach, Abdul Wali Khan Sports Complex, Charsadda.

*Under 2019 Rules
Appointment were
made*

DIRECTOR GENERAL

No.17/Promotion/QSC/PSB/19

Dated 21-05-2019

Copy forwarded for information and necessary action to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director (Operation) o/o DG Sports Khyber Pakhtunkhwa, Peshawar.
3. Section Officer (Sports), Sports and Youth Affairs Department, Khyber Pakhtunkhwa, Peshawar w/r to his letter No. SO(S) 17/2008/DPC, dated 21-05-2019.
4. District Accounts Officer, Charsadda.
5. Assistant Director (Accounts) o/o D.G Sports Khyber Pakhtunkhwa, Peshawar.
6. District Sports Officer, Charsadda.
7. Administrator, Abdul Wali Khan Sports Complex, Charsadda.
8. Officials concerned.

DIRECTOR GENERAL



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GOVERNMENT OF KHYBER PAKHTUNKHWA,
SPORTS, CULTURE TOURISM, ARCHAEOLOGY,
MUSEUMS & YOUTH AFFAIRS DEPARTMENT.

No. SO(YA)Y-9/2017/SRI /11752-54
Dated Peshawar, the 10th September, 2020.

To

1. The Director General of Sports,
Khyber Pakhtunkhwa, Peshawar.
2. The Directress Youth Affairs,
Khyber Pakhtunkhwa, Peshawar.

Date: 246-24/S. Rules
10-9-2020
Directorate General of Sports
KPK, Peshawar City

Subject:- i) REQUEST FOR REVISION OF SERVICE RULES FOR PROMOTION OF NAIB QASID TO THE POST OF JUNIOR CLERK
ii) REQUEST FOR PROMOTION OF NAIB QASID, CHOWKIDAR, MALI ETC

Dear Sir/Madam,

I am directed to enclose herewith a copy of minutes of the above subject meeting held on 08.09.2020 at 1100 hours in the office of Additional Secretary-II, Sports Department, Khyber Pakhtunkhwa for information and further necessary action at your end, please.

Yours faithfully,

Encl: As Above

[Signature]
10/09/2020
Section Officer (S & YA)

Copy is to the:

1. PA to Addl. Secretary-II, Sports & Youth Affairs Department, Peshawar.
2. PA to Deputy Secretary-III, Sports & Youth Affairs Department, Peshawar.

Section Officer (S & YA)

~~Director HQ~~
[Signature]

All Process
16/9
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Plz put up
[Signature]

application requesting therein that they may be promoted to the post of Junior Clerk as per existing Service Rules.

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MINUTES OF THE MEETING HELD ON 08-09-2020 AT 1100 HOURS . IN THE
OFFICE OF ADDITIONAL SECRETARY- II, SPORTS, CULTURE, TOURISM,
ARCHAEOLOGY, MUSEUMS & YOUTH AFFAIRS DEPARTMENT, KHYBER
PAKHTUNKHWA.

A meeting to discuss qualification for promotion to the post of Junior Clerk (BPS-11) prescribed in the Service Recruitment Rules of Directorate General of Sports and Directorate of Youth Affairs was held on 08-09-2020 at 1100 hours under the Chairmanship of Mr. Tariq Salam, Additional Secretary-II Sports & Youth Affairs Department. The following attended:-

1. Mr. Tariq Salam,
Additional Secretary-II, Sports Department. In Chair
2. Mr. Saleem Jan,
Deputy Secretary-III, Sports Department.
3. Miss. Iram Shaheen,
Directress Youth Affairs.
4. Mr. Hamid Ali,
Assistant Director (HQ),
Directorate General of Sports.
5. Mr. Firasat Hussain,
Section Officer (Sports),
Sports & Youth Affairs Department.

2. Opening the discussion the chair welcomed the participants and asked Mr. Hamid Ali, Assistant Director (HQ), Directorate General of Sports to brief the forum regarding the matter under discussion. He explained that the qualification for promotion to the post of Junior Clerk in the Service Recruitment Rules of the Directorate General of Sports notified during the year 2017 was Matric but subsequently while making addition/amendments in the said Service Recruitment Rules during the year 2019, the qualification was prescribed as Intermediate. Thus the Class-IV employees having Matric qualification were deprived from promotion to the post of Junior Clerk. As such they challenged and submitted a joint application requesting therein to reconsider the framed rules and qualification for promotion to the post of Junior Clerk may be kept Matric instead of Intermediate. The Directress Youth Affairs was also of the view that the same position exist in the Service Recruitment Rules of Directorate of Youth Affairs and the Class-IV employees having Matric qualification are demanding that the qualification for promotion to the post of Junior Clerk may be kept Matric instead of Intermediate.

3. It was further apprised that in the meanwhile the Class-IV employees coming under promotion quota having Intermediate qualification also submitted application requesting therein that they may be promoted to the post of Junior Clerk as per existing Service Rules.

4. The matter was discussed in detail. During discussion it was pointed out that the Establishment Department has also amended the Service Recruitment Rules and the qualification for promotion to the post of Junior Clerk has been prescribed Intermediate by giving priority to the existing Matriculate employees for 4 years. The forum therefore decided not to change the existing qualification of Intermediate as the post of Junior Clerk is in BPS-11 which justify the requisite qualification of Intermediate instead of Matric. However, the chair was of the view that the existing Service Rules of the Directorate General of Sports & Directorate of Youth Affairs may be reviewed and if some amendments/changes are required to be made, a working paper may be prepared by each of the Directorate for placing before the Standing Service Rules Committee for discussion/decision.

5. The meeting ended with a vote of thanks from and to the chair.



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DIRECTORATE GENERAL SPORTS
KHYBER PAKHTUNKHWA
PESHAWAR SPORTS COMPLEX, PESHAWAR CANTT.
Ph: # 9212767 Fax # 9212768

37

No. 24/Service Rules/2019

Dated Peshawar, the 7th July, 2020.

To

The Secretary to Govt of Khyber Pakhtunkhwa,
Sports, Culture, Tourism, Archaeology, Museums
& Youth Affairs Department, Peshawar.

Subject: - REQUEST FOR REVISION OF SERVICE RULES FOR
PROMOTION OF NAIB QASID TO THE POST OF JUNIOR CLERK.

Kindly refer to your letter No. SO(YA)Y-9/2017/SR/6450-51 dated 08-06-2020 on the subject noted above and to state that the Establishment Department Khyber Pakhtunkhwa has revised its service rules for promotion of Naib Qasid to the post of Junior Clerk (BPS-11) i.e. forty per cent by promotion on the basis of seniority-cum-fitness from amongst the Naib Qasids etc who have passed F.A/F.Sc examination or its equivalent qualification from a recognized Board and made changes in the qualification column, with the condition that F.A/F.Sc or its equivalent qualification shall not apply for a period of four years from the date of commencement of said notification.

As per existing service rules of the Directorate General of Sports, the criteria for promotion to the post of Junior Clerk is "thirty three per cent on the basis of seniority-cum-fitness from amongst the Naib Qasids, Chowkidars etc having at least two years service as such who have passed Intermediate Examination."

It is brought into your kind notice that service recruitment rules of this Directorate were under process of amendment since long. The qualification for promotion of Naib Qasids to the post of Junior Clerks was enhanced from SSC to intermediate with the approval of SSRC on the analogy of so many other departments.

In view the above it is requested that this Directorate may kindly be advised as to whether the promotion case of Naib Qasids may be processed as per existing Service Rules or otherwise.


DIRECTOR GENERAL



GOVERNMENT OF KHYBER PAKHTUNKHWA
SPORTS, TOURISM, ARCHAEOLOGY, MUSEUMS &
YOUTH AFFAIRS DEPARTMENT
No. (DYA) 19/02/2020
Islamabad, the 19th February, 2020.

File No. 21/2
Date: 19/02/2020
Directorate General of Sports
& Youth Affairs
K.P.K. Peshawar

To,
The Director Youth Affairs,
Khyber Pakhtunkhwa,
Peshawar

The Director General Sports,
Khyber Pakhtunkhwa,
Peshawar

Subject - REQUEST FOR REVISION OF SERVICE RULES FOR PROMOTION OF NAIB QASID TO THE POST OF JUNIOR CLERK

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of an application alongwith Service Rules received from Naib Qasid, of Directorate General Sports and Youth Affairs, Khyber Pakhtunkhwa for views / comments, please.

Yours faithfully,

[Signature] 19/02/2020

Section Officer
(Sports & Youth Affairs)

Encl: as above

Copy is forwarded for information to PA to Additional Secretary Sports & Youth Affairs Department, Khyber Pakhtunkhwa.

Section Officer
(Sports & Youth Affairs)

~~DD/11/20~~
[Signature]
20/2

Please put up on file
with pps. *[Signature]* 21/2

qs *[Signature]* 21/2 *[Signature]*

GOVERNMENT OF KHYBER PAKHTUNKHWA
SPORTS, TOURISM, CULTURE, YOUTH AFFAIRS, ARCHAEOLOGY
PUC Pn 001/2010/MS/MS/MS, DEPARTMENT CIVIL SECRETARIAT

Subject: - REQUEST FOR PROMOTION FROM THE POST OF NAIB QASID, CHOWKIDAR AND MALI ETC. TO THE POST OF JUNIOR CLERK ACCORDING TO SERVICE RULES, 2010

Mr Nisar, Malang Jan and others, Class-IV employes of Directorate of Sports & Youth Affairs, Khyber Pakhtunkhwa- vide PUC have requested this Department for promotion to the Post of Junior Clerk in accordance with the Service Rules dated 29.04 2010 (File-A) on the ground that they are fulfilling the criteria fixed for promotion to the post of Junior Clerk in the above mentioned rules.

It is to be noted that according to the Service Rules mentioned above, criteria for promotion from the post of Naib Qasids, Chowkidars etc. is as under.

S#	Nomenclature of post	Minimum qualification for appointment (or by Initial recruitment)	Age limit	Method of recruitment
21	Junior Clerk (BS-11)	At least Second Division Intermediate Certificate or its equivalent qualification from a recognized Board with a speed of thirty (30) words per minute in typing	18 - 30 Years	Thirty-three percent by promotion on the basis of seniority-cum-fitness, from amongst the Naib Qasids (BS-03), Chowkidars (BS-03), Security Guard (BS-03), Cleaners (BS-03), Conductors (BS-03) including holders of equivalent posts in the Directorate General of Sports having at least two years service as such who have passed Intermediate Examination.

It is to be noted that some employees belonging to the Class-IV cadre of Directorate of Sports & Youth Affairs, Khyber Pakhtunkhwa having matric qualification have also requested for promotion to the post of Junior Clerks and have requested that the condition of FA, FSc. may be expelld and matric qualification may be retained for promotion to the post of Junior Clerk. It is worth mentioning here that their case is under process in this Department.

Keeping in view the above, we may:

- i) Allow the Director General of Sports, Khyber Pakhtunkhwa to promote the Class-IV employees having Intermediate Qualification as per existing rules;
- OR
- ii) we may wait till the outcome of the case already under process in this Department.

Submitted for orders as deemed appropriate, please.

[Signature]
Section Officer (Sports)

Deputy Secretary-III



GOVERNMENT OF KHYBER PAKHTUNKHWA
SPORTS, CULTURE TOURISM, ARCHAEOLOGY
MUSEUMS & YOUTH AFFAIRS DEPARTMENT

No. SO(YA)Y-9/2017/SRJ
Dated Peshawar, the 01st September, 2020.

To

1. The Director General of Sports,
Khyber Pakhtunkhwa, Peshawar.
2. The Director Youth Affairs,
Khyber Pakhtunkhwa, Peshawar.

Subject: i) REQUEST FOR REVISION OF SERVICE RULES FOR PROMOTION
OF NAIB QASID TO THE POST OF JUNIOR CLERK
ii) REQUEST FOR PROMOTION OF NAIB QASID, CHOWKIDAR, MALI
ETC

Dear Sir/Madam,

I am directed to refer to the subject noted and to state that meeting
scheduled for 01.09.2020 at 11:00 AM has been postponed and now will be held on
02.09.2020 at 11:00 AM under the chairmanship of Additional Secretary-II in his
office.

2. You are therefore requested to attend the above meeting on the
scheduled date, time and venue, please.

3. In convenience caused is regretted.

Yours faithfully,

01/09/2020
Section Officer (S & YA)

Copy is to the:

1. PA to Addl. Secretary-II, Sports & Youth Affairs Department, Peshawar.
2. PA to Deputy Secretary-III, Sports & Youth Affairs Department, Peshawar.

Section Officer (S & YA)

(41)



SPORTS, CULTURE, TOURISM, AND YOUTH AFFAIRS DEPARTMENT
MUSKUMS & YOUTH AFFAIRS DEPARTMENT

The Director General of Sports
Khyber Pakhtunkhwa, Peshawar

**Subject: REQUEST FOR PROMOTION FROM THE POST OF DATA CLERK,
CHOWKHAN AND MALI ETC. TO THE POST OF JUNIOR CLERK
ACCORDING TO SERVICE RULES, 2012.**

D. No. 50

I am directed to refer to the subject noted above and to enclose herewith a copy of application alongwith its enclosures of Mr. Nisar and others Class-IV employees of Directorate General of Sports, Khyber Pakhtunkhwa for your valuable comments in the matter, please.

Yours faithfully,

[Signature]

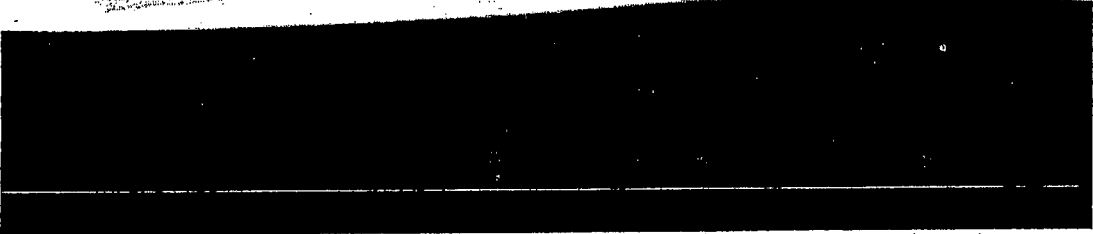
Section Officer
(Sports & Youth Affairs)

Encl. as above

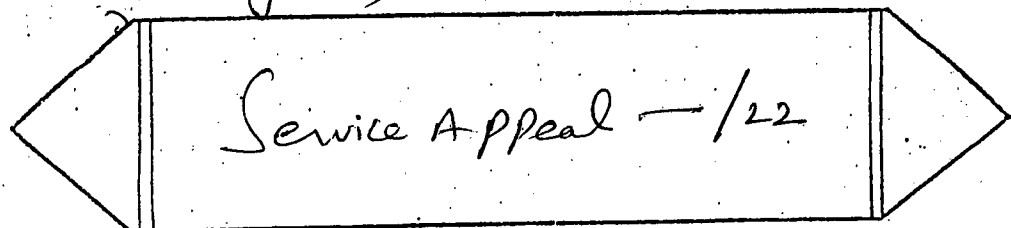
Copy is to the:

PA to Deputy Secretary-III, Sports & Youth Affairs Department, Khyber Pakhtunkhwa, Peshawar.

Section Officer
(Sports & Youth Affairs)



بعد الت - کرویس لٹرائٹوں مل ۱۹ سالہ



۲۰۲۲ء منجانب اڈیشنل

رکن اللہ بنام حکومت وکٹسہ

موزخہ	---
مقدمہ	---
دعویٰ	---
جرم	---

باعث تحریر آنکے

محمد حامد ایڈووکیٹس

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ آن مقام لیسٹور کیلئے جیڈال ایڈیشنل رکن لٹرائٹوں مل

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر حالت ہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برادگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ یا اختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المترقوم ۱۹۱۴ء ۲۰۲۲ء

Barakat-ullah

Attested by Advocate
 Jalal-uddin
 Advocate Peshawar
 03339216527

Rehmat Kundi
 Advocate

Mohammed Alam
 Advocate