

05.07.2021

Applicant present through counsel.


Riaz Khan Paindakheil learned Assistant Advocate General alongwith Asad ud Din Asif Jehan Superintendent for respondents present.

Former submitted an application for restoration as well as withdrawal of main appeal.

Record shows that appeal was dismissed in default for non-prosecution vide order dated 24.01.2019. Application for restoration of appeal was filed on 18.02.2019. Today, a request was made for withdrawal of main appeal, therefore, by acceptance of the petition filed for restoration of main appeal, instant appeal stands restored. It be registered on its old number.

In view of the written request by the learned counsel for applicant, instant appeal stands dismissed as withdrawn. No order as to costs. Files be consigned to the record room.

Announced
05.07.2021


(Rozina Rehman)
Member(J)

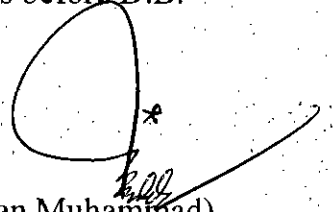

Chairman

14.01.2021

Junior to counsel for the appellant present: Addl. AG
alongwith Syed Abbdul Qadir, Agriculture Officer for
respondents present.

Arguments could not be heard due to learned
Member(Judicial) is on leave.

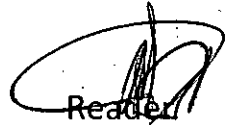
Adjourned to 01.04.2021 for arguments before D.B.



(Mian Muhammad)
Member(E)

01.04.2021

Due to non availability of the concerned D.B, the case is
adjourned to 05.07.2021 for the same.



Reader

8-4-2020

Due to COVID19, the case is adjourned to

6/7/2020 for the same as before.


Reader

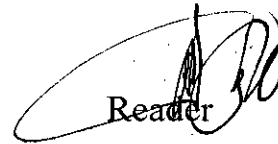
06.07.2020

Due to COVID19, the case is adjourned to 31.08.2020 for the same as before.


Reader

31.08.2020

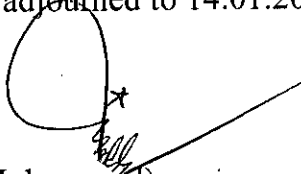
Due to summer vacation, the case is adjourned to 05.11.2020 for the same as before.


Reader

05.11.2020

Junior to counsel for the appellant and Addl: AG alongwith Mr. Asad Ud Din Asif Jah, Supdt: for respondents present.

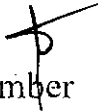
The Bar is observing general strike, therefore, the matter is adjourned to 14.01.2021 for hearing before the D.B.



(Mian Muhammad)
Member (E)


Chairman

08.11.2019


Learned counsel for the petitioner present. Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Asad ud Din Superintendent present. Representative of the respondent department requested for time to furnish reply. Granted. To come up for reply and arguments on 30.12.2019 before D.B.



Member


Member

30.12.2019

None present on behalf of the appellant. Mr. Riaz Paindakhel learned Assistant Advocate General alongwith Mr. Asad ud Din Asif Ja Superintendent for the respondents present. Representative of the respondent department requested for time to furnish reply. Notice be issued to the appellant and his counsel for attendance. Adjourned. To come up for reply and arguments on 28.02.2020 before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member


28-2-20


The learned members is on tour, Therefore case is adjourned to 8-4-2020


Rendit

21.06.2019

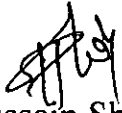
Mir Zaman Advocate on behalf of learned counsel for the petitioner present. Mr. Zia Ullah learned Deputy District Attorney present and stated that the respondents be granted opportunity to file reply of the present application. Adjourn. Notices be issued to the respondents for reply. To come up for reply and arguments on 21.08.2019 before D.B.


Member


Member

21.08.2019

Learned counsel for the applicant and Mr. Kabirullah Khattak, Additional AG alongwith Mr. Asad-u-Din, Superintendent for the respondents present. Original record of present restoration application is not available before the Bench, therefore, office is directed to ^{requestion} annex the original record of present restoration application for 07.10.2019 before D.B.



(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

07.10.2019

Petitioner absent. Learned counsel for the petitioner absent. Mr. Zia Ullah learned Deputy District Attorney present. Notice be issued to the respondents for reply for 08.11.2019. Adjourn. To come up for reply and arguments on the date fixed before D.B. Petitioner be also put to notice for the date fixed.






Member


Member

Form-A
FORM OF ORDER SHEET

Court of _____

Appeal's Restoration Application No. 116/2019

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	18.02.2019	<p>The application for restoration of appeal No.1016/2013 submitted by Mr. Noor Muhammad Khattak Advocate may be entered in the relevant register and put up to the Court for proper order please.</p> <p style="text-align: right;"> REGISTRAR 18/2/19</p>
2	30.04.2019	<p>This restoration application is entrusted to D. Bench to be put up there on <u>30-4-19</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Counsel for the petitioner present and seeks adjournment. Adjourned to 21.06.2019 for arguments on restoration application before D.B.</p> <p style="text-align: center;">  (AHMAD HASSAN) MEMBER </p> <p style="text-align: center;">  (M. AMIN KHAN KUNDI) MEMBER </p>

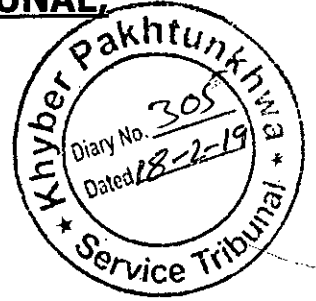
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR
Restoration Appli. No. 116/19

C.M NO. _____ /2019

IN

APPEAL NO. 1016 /²⁰¹³~~2013~~



SIRAJ-UL-HAQ

VS

AGRICULTURE DEPTT:

APPLICATION FOR RETORATION OF THE ABOVE MENTIONED
APPEAL

R/SHEWETH:

- 1- That the above mentioned service appeal was pending adjudication before this august Tribunal in which 24.01.2019 dated was fixed for hearing.
- 2- That appellant filed the above mentioned appeal against the impugned Notification dated 30.06.2011.
- 3- That due to non appearance of the Counsel for the appellant on the date mentioned above the appeal of the appellant has been dismissed by this august Tribunal vide order dated 24.01.2019. Copy of the order sheet is attached.
- 4- That on the same date Counsel for the appellant was busy before the Honorable Peshawar High Court Peshawar and due to that reason Counsel for the appellant could not appear before this august Service Tribunal.
- 5- That non appearance of the Counsel for the appellant was neither deliberate nor intentionally but caused due to the above mentioned reason.

It is therefore, most humbly prayed that on acceptance of this application the above mentioned service appeal may very kindly be restored.

Dated: 15.02.2019.

APPELLANT

SIRAJ-UL-HAQ

THROUGH:

NOOR MOHAMMAD KHATTAK
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

C.M NO. _____/2019
IN
APPEAL NO. 1016 /²⁰¹³~~2014~~

SIRAJ-UL-HAQ

VS

AGRICULTURE DEPTT:

AFFIDAVIT

I Noor Mohammad Khattak Advocate, on the instruction and on behalf of my client do hereby solemnly affirm that the contents of this **application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

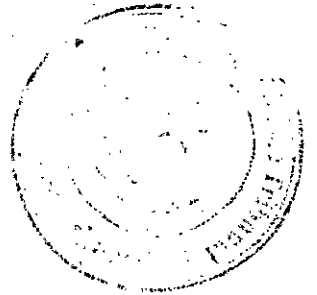

NOOR MOHAMMAD KHATTAK
ADVOCATE, HIGH COURT,
PESHAWAR

3

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Amended Appeal No. _____/2014

In Appeal No. _____/2013.



Mr. Siraj Ul Haq, Field Assistant (BPS-09),
O/O the Agency Agriculture Officer Bajaur at Khar.....**APPELLANT**

VERSUS

- 1- The Additional Chief Secretary FATA, FATA Secretariat Warsak Road, Khyber Pakhtunkhwa Peshawar.
- 2- The Director Agriculture Department FATA, FATA Secretariat Warsak Road, Khyber Pakhtunkhwa Peshawar.
- 3- The Agency Agriculture Officer, Bajaur at Khar.
- ④ Mr. Mazhar Ali Shah, Agriculture Officer, C/O Director of Agriculture Department FATA, FATA Secretariat Warsak Road, Khyber Pakhtunkhwa Peshawar.
- ⑤ Mr. Hidayatullah, Agriculture Officer, C/O Director of Agriculture Department FATA, FATA Secretariat Warsak Road, Khyber Pakhtunkhwa Peshawar.
- ⑥ Mr. Sher Afzal, Agriculture Officer, C/O Director of Agriculture Department FATA, FATA Secretariat Warsak Road, Khyber Pakhtunkhwa Peshawar.

.....**RESPONDENTS**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 30-06-2011 AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF NINETY DAYS

PRAYERS:

That on acceptance of this appeal the impugned Notification dated 30-06-2011 may very kindly be set aside to the extant of the appellant and the respondent Department may be directed to treat/proceed the appellant in light of the Notification dated 20-04-2012. Any other remedy which this august tribunal deems fit may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

- 1- That appellant has joined respondent Department as Field Assistant (BPS-06) vide order dated 07-08-1982. That right from appointment till date appellant performing his duty quite efficiently and up to the entire satisfaction of his superiors.

EX-POSTE
28-01-2016

Copy to be sent to
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

4

12.10.2018

Junior to counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney for the respondent present. Junior to counsel for the appellant seeks adjournment on the ground that ~~his~~ senior counsel is not in attendance. Adjourned. To come up for arguments on 27.11.2018 before D.B


Member

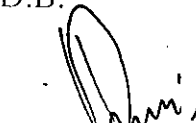

Member

27.11.2018

Junior to counsel for the appellant and Addl. AG for the respondents present.

Learned senior counsel for appellant is reported to be busy before the Hon'ble High Court in a number of cases today. A request for adjournment made at the bar. Adjourned to 24.01.2019 for arguments before the D.B.


Member


Chairman

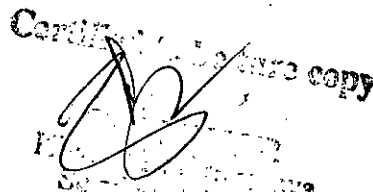


24.01.2019

Appellant absent. Learned counsel for the appellant absent. Mr. Zia Ullah learned Deputy District Attorney for the respondents present. The present case is lingering on since the year 2013. Case called but none appeared on behalf of the appellant. Consequently the present service appeal is dismissed in default. No order as to costs file be consigned to the record room.


Member


Member


Certified to be true copy
Member

Date of Presentation of Appeal	31-1-18
Number of Wards	6
Copying Fee	6
Urgent	6
Total	12-2-18
Name of Counsel	12-2-18
Date of Copy	12-2-18
Date of Delivery of Copy	12-2-18

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Restoration Appeal No. 111/19

Shamsher Khan and Five Others

APPELLANT

VERSUS

ACS FATA, Director Agriculture

(Extension) Merged Areas, Peshawar & Others

RESPONDENTS

Parawise Comments /Replies on Behalf of the Respondents. 2

PRAYERS:

- 1- No comments:
- 2- No comments:
- 3- Correct: To extent of dismissal of appeal neither appellant nor did his counsel was present on the date fixed. Therefore, his appeal was dismissed/rejected.
- 4- Subject to proof however the instant petition is badly time barred.
- 5- As replied at Para- No. 3

PRAYERS:

The appeal may very kindly be dismissed with cost in the interest of public service.

Respondent No. 2



DIRECTOR AGRICULTURE
(EXTENSION) MERGED AREAS
PESHAWAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Restoration Appeal No. 112/19

Shafiullah and Five Others

APPELLANT

VERSUS

ACS FATA, Director Agriculture

(Extension) Merged Areas, Peshawar & Others

RESPONDENTS

Parawise Comments /Replies on Behalf of the Respondents. 2

PRAYERS:

- 1- No comments:-
- 2- No comments:
- 3- Correct: To extent of dismissal of appeal neither appellant nor did his counsel was present on the date fixed. Therefore, his appeal was dismissed/rejected.
- 4- Subject to proof however the instant petition is badly time barred.
- 5- As replied at Para- No. 3

PRAYERS:

The appeal may very kindly be dismissed with cost in the interest of public service.

Respondent No. 2



DIRECTOR AGRICULTURE
(EXTENSION) MERGED AREAS
PESHAWAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Restoration Appeal No. 113/19

Shah Wali and Five Others

APPELLANT

VERSUS

ACS FATA, Director Agriculture

(Extension) Merged Areas, Peshawar & Others

RESPONDENTS

Parawise Comments /Replies on Behalf of the Respondents. 2

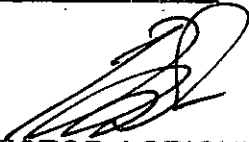
PRAYERS:

- 1- No comments:
- 2- No comments:
- 3- Correct: To extent of dismissal of appeal neither appellant nor did his counsel was present on the date fixed. Therefore, his appeal was dismissed/rejected.
- 4- Subject to proof however the instant petition is badly time barred.
- 5- As replied at Para- No. 3

PRAYERS:

The appeal may very kindly be dismissed with cost in the interest of public service.

Respondent No. 2


DIRECTOR AGRICULTURE
(EXTENSION) MERGED AREAS
PESHAWAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Restoration Appeal No. 114/19

Khaista Rehman and Five Others

APPELLANT

VERSUS

ACS FATA, Director Agriculture

(Extension) Merged Areas, Peshawar & Others

RESPONDENTS

Parawise Comments /Replies on Behalf of the Respondents. 2

PRAYERS:

- 1- No comments:
- 2- No comments:
- 3- Correct: To extent of dismissal of appeal neither appellant nor did his counsel was present on the date fixed. Therefore, his appeal was dismissed/rejected.
- 4- Subject to proof however the instant petition is badly time barred.
- 5- As replied at Para- No. 3

PRAYERS:

The appeal may very kindly be dismissed with cost in the interest of public service.

Respondent No. 2


DIRECTOR AGRICULTURE
(EXTENSION) MERGED AREAS
PESHAWAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Restoration Appeal No. 115/19

Sher Mohammad and Five Others

APPELLANT

VERSUS

ACS FATA, Director Agriculture

(Extension) Merged Areas, Peshawar & Others

RESPONDENTS

Parawise Comments /Replies on Behalf of the Respondents. 2

PRAYERS:

- 1- No comments:
- 2- No comments:
- 3- Correct: To extent of dismissal of appeal neither appellant nor did his counsel was present on the date fixed. Therefore, his appeal was dismissed/rejected.
- 4- Subject to proof however the instant petition is badly time barred.
- 5- As replied at Para- No. 3

PRAYERS:

The appeal may very kindly be dismissed with cost in the interest of public service.

Respondent No. 2


DIRECTOR AGRICULTURE
(EXTENSION) MERGED AREAS
PESHAWAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Restoration Appeal No. 116/19

Siraj-ul-Haq and Five Others

APPELLANT

VERSUS

ACS FATA, Director Agriculture

(Extension) Merged Areas, Peshawar & Others

RESPONDENTS

Parawise Comments /Replies on Behalf of the Respondents. 2.


PRAYERS:

- 1- No comments:
- 2- No comments:
- 3- Correct: To extent of dismissal of appeal neither appellant nor did his counsel was present on the date fixed. Therefore, his appeal was dismissed/rejected.
- 4- Subject to proof however the instant petition is badly time barred.
- 5- As replied at Para- No. 3

PRAYERS:

The appeal may very kindly be dismissed with cost in the interest of public service.

Respondent No. 2


DIRECTOR AGRICULTURE
(EXTENSION) MERGED AREAS
PESHAWAR

12.10.2018

Junior to counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney for the respondent present. Junior to counsel for the appellant seeks adjournment on the ground that ~~his~~ senior counsel is not in attendance. Adjourned. To come up for arguments on 27.11.2018 before D.B


Member

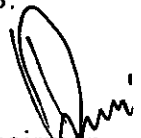

Member

27.11.2018

Junior to counsel for the appellant and Addl. AG for the respondents present.

Learned senior counsel for appellant is reported to be busy before the Hon'ble High Court in a number of cases today. A request for adjournment^{is} made at the bar. Adjourned to 24.01.2019 for arguments before the D.B.


Member


Chairman

24.01.2019

Appellant absent. Learned counsel for the appellant absent. Mr. Zia Ullah learned Deputy District Attorney for the respondents present. The present case is lingering on since the year 2013. Case called but none appeared on behalf of the appellant. Consequently the present service appeal is dismissed in default. No order as to costs file be consigned to the record room.



Member


Member

12.04.2018

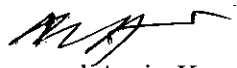
Counsel for the appellant and Mr. Usman Ghani, District Attorney alongwith Shahab Khattak, Coordinator for the respondents present. Counsel for the appellant seeks adjournment. Granted. To come up for arguments on 28.06.2018 before the D.B.



Member


Chairman

28.06.2018

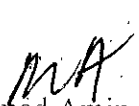
Clerk of the counsel for appellant and Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Clerk of the counsel for appellant seeks adjournment on the ground that his counsel is not available today. Adjourned. To come up for arguments on 10.08.2018 before D.B.



(Muhammad Amin Kundi)
Member


(Muhammad Hamid Mughal)
Member

10.08.2018

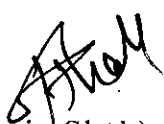
Learned counsel for the appellant and Mr. Kabir Ullah Khattak learned Additional Advocate General present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 01.10.2018 before D.B.

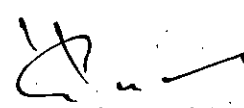

(Muhammad Amin Kundi)
Member


(Muhammad Hamid Mughal)
Member

01.10.2018

Junior to counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney for the respondent present. Junior to counsel for the appellant seeks adjournment on the ground that learned senior counsel is not available today. Last opportunity is granted. Adjourned. To come up for arguments on 12.10.2018 before D.B.


(Hussain Shah)
Member


(Muhammad Hamid Mughal)
Member

Service Appeal No. 1018/2013

10.11.2017

Junior counsel for the appellant present. Mr. Usman Ghani, District Attorney alongwith Mr. Ehtisham, Assistant Director Food for the respondents also present. Junior counsel for the appellant requested for adjournment on the ground that learned senior counsel for the appellant is not available today. Adjourned. To come up for arguments on 12.12.2017 before D.B.


(Gul Zeb Khan)
Member


(Muhammad Amin Khan Kundi)
Member

12.12.2017

Appellant in person and Mr. Kabeerullah Khattak, Addl. AG for the respondents present. Due to general strike of the bar, counsel for the appellant is not in attendance. To come up for arguments on 14.02.2018 before the D.B.


Member


Chairman

13.02.2018

Clerk of the counsel for appellant present. Mr. Zia Ullah, DDA for the respondents present. Counsel for the appellant is not in attendance due to general strike of the bar. To come up for arguments on 12.04.2018 before D.B.


Member


Chairman

05.08.2016

Counsel for the appellant (Mr. Noor Muhammad Khattak, Advocate) and Addl: AG for respondents present. Counsel for the appellant requested for time to file rejoinder. To come up for rejoinder and arguments on 18.11.2016.

Member

Member

18.11.2016

Agent to counsel for the appellant and Mr. Shakirullah, Assistant Director alongwith Mr. Ziaullah, GP for respondents present. Rejoinder submitted and requested for adjournment. To come up for arguments on 16.3.2017 before D.B.

Member

Chairman

16.03.2017

Mr. Muhammad Jilal, junior counsel for appellant and Mr. Ehtisham, Assistant Director (Food Cell) alongwith Mr. Muhammad Adeel Butt, Additional AG for official respondents No. 1 to 3 present. Junior counsel for appellant requested for adjournment as senior counsel for appellant is stated busy in the Hon'ble Peshawar High Court. Adjournment granted. To come up for arguments on 11.07.2017 before D.B.

(ASHFAQUE TAJ)
MEMBER

(MUHAMMAD AMIR NAZIR)
MEMBER

11.07.2017

Junior to counsel for the appellant and Mr. Ziaullah, DDA for the respondents present. Requested for adjournment as senior counsel for the appellant is busy in Darul Qaza, Swat. Adjourned. To come up for arguments on 10.11.2017 before the D.B.

Member

Chairman

26.10.2015

Counsel for the appellant, M/S Miftah-ud-Din, Agriculture Officer and Zia-ul-Islam, APO alongwith Addl: A.G for official respondents No. 1 to 3 present. None present for private respondents No.4 to 6. Fresh notices be issued to the afore-sated private respondents for 28.01.2016 for submission of written reply/comments before S.B.


Chairman

28.1.2016

Counsel for the appellant, M/S Meftah-ud-Din, Agriculture Officer and Shakir Ullah, AD alongwith Addl: A.G for official respondents No. 1 to 3 present. None present on behalf of private respondents No. 4 to 6. Proceeded ex-parte. Official respondents requested for further adjournment. Last opportunity granted. To come up for written reply/comments on behalf of official respondents No. 1 to 3 on 14.4.2016 before S.B.


Chairman

14.4.2016

Agent of counsel for the appellant and M/S Misbahud Din, Agriculture Officer and Shakirullah, AD alongwith Addl: A.G for respondents present. Written reply by respondents submitted. The appeal is assigned to D.B for rejoinder and final hearing for 05.8.2016.


Chairman

06.07.2015

Clerk of counsel for the appellant and Asstt: AG for the respondents present. Clerk of counsel for the appellant requested for adjournment. To come up for preliminary hearing on 28.07.2015.



Member

28.07.2015

Counsel for the appellant and Assistant A.G for respondents present. Learned counsel for the appellant argued that the appellant is entitled to be considered for promotion as Agriculture Inspector on the strength of the notification dated 20.4.2012 on the basis of seniority-cum-fitness and that the respondents are not justified to apply the mandates of notification dated 30.6.2011 including clause-iii, iv and v of the said notification as the same stood superseded on the strength of notification dated 20.4.2012. That the appellant preferred departmental appeal on 8. 2.2013 against the said decision which was not responded and hence the instant service appeal on 10.6.2013.

That the appellant is entitled to be considered for promotion to the post of Agriculture Inspector on the strength of notification dated 20.4.2012 and that the vires of superseding the notification dated 30.6.2011 are not applicable to the case of the appellant.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 26.10.2015 before S.B. Notice of the stay application be also issued for the date fixed.



Chairman

Appellant Deposited
Security & Process Fee



21.

20.04.2015

Agent of counsel for the appellant and Asstt: AG for the respondents present. Agent of counsel for the appellant requested for adjournment. Request accepted. To come up for preliminary hearing on 04.05.2015 before S.B.



Member

22.

04.05.2015

Clerk of counsel for the appellant and Asstt:AG for the respondents present. Clerk of counsel for the appellant requested for adjournment. Request accepted. To come up for preliminary hearing for 27.05.2015 before S.B.



Member

27.05.2015

Clerk of counsel for the appellant and Asstt: AG for the respondents present. Clerk of counsel for the appellant requested for adjournment. Adjourned to 06.07.2015 for preliminary hearing before S.B.



Member

18.

23.09.2014

Counsel for the appellant and Mr. Ziaullah, GP for the respondents present. Preliminary arguments to some extent heard. Counsel for the appellant requested for adjournment. To come up for further preliminary hearing on 20.11.2014.


Member

19.

Reader Note:

20.11.2014

Clerk of counsel for the appellant and Mr. Ziaullah, GP for the respondents present. Since the Tribunal is incomplete, therefore, case is adjourned to 05.01.2015 for the same.


Reader

20.

Reader Note:

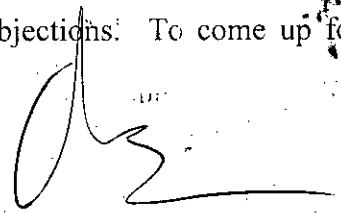
05.01.2015

Clerk of counsel for the appellant and Mr. Kabirullah Khattak, Asst. Advocate General for the respondents present. Since the Tribunal is incomplete, therefore, case is adjourned to 20.12.2015 for the same.


Reader

15
15.08.2014

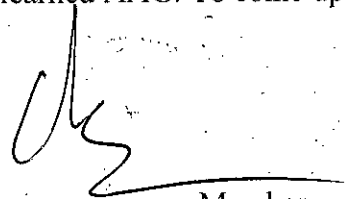
Counsel for the appellant and Mr. Muhammad Jan, GP for the respondents present. Preliminary arguments partly heard. The learned counsel for the appellant argued before the Court that during to pendency of the appeal the respondents have notified fresh service rules superseding the old service rules copy of the same has already been filed through application for placing on file additional documents, therefore appellant be allowed to amend the instant appeal. Adjournment for amendment in the instant appeal granted subject to all legal objections. To come up for preliminary hearing on 28.08.2014.



Member

17
28.08.2014

Counsel for the appellant and Mr. Kabirullah Khattak, Assistant Advocate General for the respondents present. Learned counsel for the appellant filed amended appeal with spare sets, copy whereof is handed over to the learned AAG. To come up for further proceedings on 23.09.2014.



Member

19.

06.08.2014

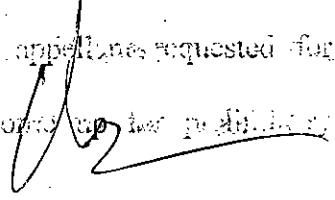
Counsel for the appellant and Mr. Ziaullah, GP for the respondents present. Counsel for the appellant requested for adjournment. Request accepted. To come up for preliminary hearing on 15.08.2014.

Member

[A large, long, curved handwritten signature or scribble spans across the lower half of the page.]

12. 24.06.2014


Counsel for the appellant and Mr. Ziaullah, GP for the respondents present. Counsel for the appellant requested for adjournment. Request accepted. To come up for preliminary hearing on 01.06.2014. Counsel for the appellants requested for adjournment. Request accepted. To come up for preliminary hearing on 11.07.2014.


Member

Member


13. 30.06.2014

Counsel for the appellant and Mr. Ziaullah, GP for the respondents present. Counsel for the appellant requested for adjournment. Request accepted. To come up for preliminary hearing on 11.07.2014.


Member

14. 11.07.2014

Clerk of counsel for the appellant and Mr. Ziaullah, GP for the respondents present. Clerk of counsel for the appellant requested for adjournment. Request accepted. To come up for preliminary hearing on 06.08.2014.


Member

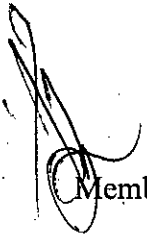
23.04.2014

Clerk of counsel for the appellant and Mr. Ziaullah, GP for the respondents present. Clerk of counsel for the appellant requested for adjournment due to general strikes of the Bar. To come up for preliminary hearing on 16.05.2014.


Member

16.05.2014

Counsel for the appellant and Mr. Ziaullah, GP for the respondents present. The learned counsel for the appellant requested for adjournment. To come up for preliminary hearing on 20.06.2014.


Member

20.06.2014

Counsel for the appellant and Mr. Ziaullah, GP for the respondents present. Counsel for the appellant filed an application for allowing the appellant to submit additional documents in the instant appeal, copy of application is handed over the learned GP. To come up for further preliminary hearing on 24.06.2014.


Member

7.
28.02.2014

Counsel for the appellant and Mr. Zia Ullah, GP for the respondents present. Counsel for the appellant submitted redrafted page No.1 of the memo of appeal with spare sets. Preliminary arguments to some extent heard. The learned counsel for the appellant requested for further time to assist the tribunal on the point of maintainability. To come up for further preliminary hearing 25.03.2014.

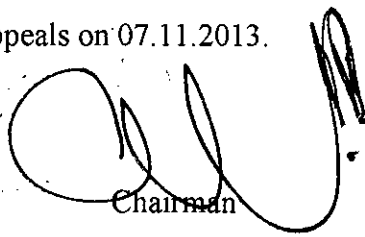

Member

8.
25.03.2014

Counsel for the appellant and Mr. Ziaullah, GP for the respondents present. Preliminary arguments partly heard. Perusal of the case file reveals that through the instant appeal the appellant has impugned notification dated 30.06.2011, however, departmental appeal filed by the appellant on 08.02.2013, with considerable delay. The learned counsel for the appellant requested for time to assist the Tribunal regarding filing of late departmental appeal. To come up for further preliminary arguments on 23.04.2014.


Member

3. 23.9.2013 Clerk of counsel for the appellant present, and requested for adjournment due to strike of the Bar. To come up for preliminary hearing alongwith connected appeals on 07.11.2013.


Chairman

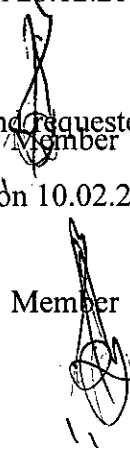
07.11.2013

4.

07.11.2013 Munshi to counsel for the appellant present. Requested for adjournment to come up for preliminary hearing on 20.12.2013.

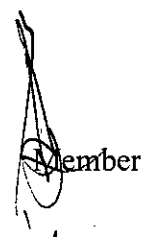
5.

20.12.2013 Clerk of counsel for the appellant present and requested for adjournment. To come up for preliminary hearing on 10.02.2013.


Member

6.



10.02.2014 Counsel for the appellant present and submitted an application for suspension of operation of impugned notification dated 30.06.2011. He requested for adjournment. To come up for preliminary hearing on 28.02.2014.


Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1016/2013

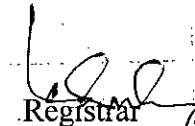
S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	28/06/2013	<p>The appeal of Mr. Siraj-ul-Haq resubmitted today by Mr. Noor Muhammad Khattak Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing. Munshi to request for appellant presence requested for</p> <p>adjournment to come up for preliminary hearing on 27.12.2013.</p> <p align="right"> REGISTRAR</p>
2	16-7-2013	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>23-7-2013</u>.</p> <p align="right"> CHAIRMAN</p>

The appeal of Mr. Siraj-ul-Haq Field Assistant received today i.e. 07/06/2013 is incomplete on the following scores which is returned to the counsel for the appellant for completion and resubmission within 15 days:-

Addresses of respondent No. 4 to 6 are incomplete which may be completed according to Khyber Pakhtunkhwa Service Tribunal Rules 1974.

No. 885 /S.T,

Dt. 10/06 /2013.


Registrar
Khyber Pakhtunkhwa
Service Tribunal
Peshawar.

Noor Muhammad Khattak Adv. Pesh.

Note:

*Sir, all objections has been removed
hence resubmitted today dated 28/6/2013.*

sq.

Sirs

*So far as the addresses of the private
respondents are concerned they belongs
to different agencies of FATA, therefore all
respondents may be informed through
respondent no-2.*

sq.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

AMENDED APPEAL NO. _____/2014

APPEAL NO. 10/6 /2013

Siraj Ul Haq

VS

A.C.S. FATA

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Appeal	1- 4.
2.	Stay application	5.
3.	Service Book	A	6- 11.
4.	Move over order	B	12- 13.
6.	Promotion order	C	14- 15.
7.	Seniority lists	D & E	16- 18.
8.	Notification dated:30.6.2011	F	19- 20.
9.	Notification dated:20.4.2012	G	21- 25.
10.	Notification dated:01.02.1981	H	26- 34.
11.	Departmental appeal	I	35- 36.
12.	Vakalat Nama	37.

APPELLANT

THROUGH:

NOOR MOHAMMAD KHATTAK
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Amended Appeal No. _____/2014

In Appeal No. _____/2013.

Mr. Siraj Ul Haq, Field Assistant (BPS-09),
O/O the Agency Agriculture Officer Bajaur at Khar.....**APPELLANT**

VERSUS

- 1- The Additional Chief Secretary FATA, FATA Secretariat Warsak Road, Khyber Pakhtunkhwa Peshawar.
- 2- The Director Agriculture Department FATA, FATA Secretariat Warsak Road, Khyber Pakhtunkhwa Peshawar.
- 3- The Agency Agriculture Officer, Bajaur at Khar.
- ④ Mr. Mazhar Ali Shah, Agriculture Officer, C/O Director of Agriculture Department FATA, FATA Secretariat Warsak Road, Khyber Pakhtunkhwa Peshawar.
- ⑤ Mr. Hidayatullah, Agriculture Officer, C/O Director of Agriculture Department FATA, FATA Secretariat Warsak Road, Khyber Pakhtunkhwa Peshawar.
- ⑥ Mr. Sher Afzal, Agriculture Officer, C/O Director of Agriculture Department FATA, FATA Secretariat Warsak Road, Khyber Pakhtunkhwa Peshawar.

.....**RESPONDENTS**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 30-06-2011 AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF NINETY DAYS

PRAYERS:

That on acceptance of this appeal the impugned Notification dated 30-06-2011 may very kindly be set aside to the extant of the appellant and the respondent Department may be directed to treat/proceed the appellant in light of the Notification dated 20-04-2012. Any other remedy which this august tribunal deems fit may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

- 1- That appellant has joined respondent Department as Field Assistant (BPS-06) vide order dated 07-08-1982. That right from appointment till date appellant performing his duty quite efficiently and up to the entire satisfaction of his superiors.

*Ex parte
28-01-2016*

Copy of the Service book is attached as annexure.....**A.**

2- That appellant was allowed move-over to BPS-11 vide order dated 08-10-2003. That appellant has served the respondent Department for more than 28 years as Field Assistant. That despite of having experience and seniority the appellant has not been promoted to the post of Agriculture Inspector till date though many other colleagues and junior colleagues of the appellant have been promoted by the respondent Department and has now been working as Agriculture Officers (BPS-17) but the appellant having more than 28 years service and being senior most employee and eligible for promotion has not been promoted till date to the post of Agriculture Inspector. Copies of the orders and seniority lists are attached as annexure**B, C, D & E.**

3- That so much so the respondent Department has issued Notification dated 30-06-2011 due to which the chances of promotion to the post of Agriculture Inspector (BPS-11) has been attached with the condition that "33% of total sanctioned posts of Agriculture Inspector be allowed BPS-11 to BPS-14 as Agriculture Supervisor in each wing of Agriculture Department subject to minimum service of 15 years service as Agriculture Inspector or Field Assistant. The curriculum of Field Assistant class will be revised and duration of the course will be enhanced from 2 years to 3 years(Diploma Course)for Field Assistant and six months condensed course in the relevant field in the respective wing of the Agriculture Department will be conducted for in service staff and they will clear the examination in two terms otherwise they will be compulsory retired from service". Copy of the Notification dated 30-06-2011 is attached as annexure.....**F.**

4- That the respondent Department through Notification dated 20-04-2012 superceded all the previous Notifications including the impugned Notification dated 30-06-2011. That according to the said Notification dated 20-04-2012 the respondent Department retained/maintained the old criteria for promotion to the post of Agriculture Inspector from the post of Field Assistant which have been mentioned in the old rules. Copies of the Notifications dated are attached as annexure.....**G & H.**

5- That inspite of the new Notification dated 20-04-2012 due to which the respondent Department superceded the impugned Notification dated 30-06-2011 directed the appellant to appear for the condensed course and also informed the appellant the he will be promoted to the post of Agriculture

Supervisor BPS-14 in the light of impugned Notification dated 30-06-2011.

- 6- That feeling aggrieved appellant prefer Departmental appeal to respondent Department but no reply has been received with in the statutory period of ninety days. Hence the present appeal on the following grounds amongst the others. Copy of the Departmental appeal is attached as annexure.....I.

GROUND:

- A- That the impugned Notification dated 30-06-2011 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That not granting/allowing promotion to the appellant to the post of Agriculture Inspector (BPS-11) from the post of Field Assistant is against the law, facts, and norms of natural justice.
- C- That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- D- That the impugned Notification dated 30-06-2011 has been null and void and having no force of law in light of the new Notification dated 20-04-2012, therefore the same may be set aside.
- E- That despite of having more than 28 years service and having eligibility for promotion to the post of Agriculture Inspector (BPS-11), the appellant has been ignored from promotion to higher scale.
- F- That the respondent Department has acted in arbitrary and malafide manner by not promoting the appellant to the post of Agriculture Inspector (BPS-11) inspite of seniority and eligibility.
- G- That many of the appellant colleagues and junior colleagues have now been working as Agriculture Officers BPS-17 and the appellant is still working as Field Assistant (BPS-09) thus the appellant has been discriminated and not been treated amongst his similarly placed colleague.
- H- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

APPELLANT



SIRAJ UL HAQ

THROUGH:



**NOOR MOHAMMAD KHATTAK
ADVOCATE**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO _____/2014

Siraj Ul Haq

VS

A.C.S. FATA

APPLICATION FOR SUSPENTION OF OPERATION OF
IMPUGNED NOTIFICATION DATED 30-06-2011 TILL THE
DISPOSAL OF THIS APPEAL

R/SHEWETH:

- 1- That the appellant filed above mentioned appeal along with this application is pending adjudication before this august service Tribunal in which 28-08-2014 date is fixed for hearing.
- 2- That all the three ingredients necessary for the stay is in favor of the appellant.
- 3- That the impugned Notification dated 30-06-2011 is against the appointment, promotion and transfer rules 1989.
- 4- That the grounds of main appeal are also be considered as integral part of this application.

It is therefore humbly prayed that on acceptance of this application the Notification dated 30-06-2011 may very kindly be suspended till disposal of this appeal.

APPELLANT


SIRAJ UL HAQ

THROUGH:


NOOR MOHAMMAD KHATTAK
ADVOCATE



A-6

1. Name Siraj ul Haq (نام)

2. Nationality and Religion Islamic (قومیت اور مذہب)

3. Residence Red. M. Shah. Vill. Mulkoo P.O. Munda (مستقل رہائش)

4. Father's name and residence Mudul Masum (والد کا نام اور پتہ)

5. Date of birth by Christian era as nearly as can be ascertained 10-2-1963 (تاریخ پیدائش مطابق سن عیسوی)

6. Exact height by measurement 5-6 (قد و قامت)

7. Personal mark for identification A Scar on left leg. (نشان شناخت)

8. Left hand/right hand thumb and finger-impressions of (None-gazetted) officer.
(سود کی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)
Little Finger (چونکی) Ring Finger (پونجیا کے ساتھ کی انگلی) Middle Finger (میان)

Fore Finger (انگشت شہادت)

Thum (انگوٹھا)

9. Signature of Government servant (سرکاری ملازم کے دستخط)

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

(تصدیق کنندہ افسر کے دستخط اور مہر)

ATTESTED

Handwritten signature or mark.

Handwritten mark or signature.

Note :- The entries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after every 5 years under this rule. اس صفحہ کے مندرجات کم از کم ہالچ سال بعد تصدیق ہونا ضرورت ہیں اور نمبر 9-10 میں دستخطوں کے تاریخ ہونی چاہئے۔ انگلیوں کے نشانات کیلئے ہر ہالچ سال کے بعد تصدیق کی ضرورت نہیں۔

1	2	3	4	5	6	7	8
Name of post درجہ ملازمت	Whether substantive or officiating, and whether permanent or temporary عارفی مستقل یا قائم مقام	If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume II اگر عارضی ہے تو کیا وہ درجہ کے مطابق پیشن کا مستحق ہے	Pay in substantive post تنخواہ نامور عارفی ملازمت	Additional pay for officiating زائد تنخواہ نادر تنخواہ یعنی قائم مقام	Other emoluments falling under the term "pay" ماسوائے تنخواہ و دیگر الاؤٹس	Date of appointment تاریخ تقررہ	Signature of Government servant دستخط سرکاری ملازم
F. Assistant			RS. P.	RS. P.			
290-10-350/12	470-14-540			290/-		7.8.82 (F. No. 11000)	
F. Assstt.	officiating temp. 1983						
6-540-20-940	-do-			540/-		1.7.83	
P. Assstt.							
-do-	-11-			560/-		1.12.83	
-do-	-do-			530/-		1.12.84	

Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8
دستخط دفتر
مجاز

W

W

W
B. A. D. A.
Bajaur Agency
Khar. II

9	10	11	12	13 LEAVE		14	15				
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 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	Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitible 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				
					<table border="1"> <tr> <th data-bbox="846 573 956 710">Period</th> <th data-bbox="956 573 1097 710">Govt. to which debitible</th> </tr> <tr> <td></td> <td></td> </tr> </table>	Period	Govt. to which debitible				
Period	Govt. to which debitible										
<p>Signature of Government servant</p> <p>دستخط و نام</p>	<p>تاریخ انتظامی ملازمت</p>	<p>وجوہات ارتقاء منیت ترقی، تبادلہ یا برطرفی</p>	<p>دستخط افسر مجاز</p>	<p>درخواست کی نوعیت و معیار</p>	<p>چار ماہ تک کارخصت کیلئے اوسط متواتر کارکردگی</p>	<p>دستخط افسر مجاز</p>	<p>سزا یا جزا یا توبیخ یا کارکردگی کا ریکارڈ</p>				
<p>دستخط</p>	<p>دستخط</p>	<p>دستخط</p>	<p>دستخط</p>	<p>دستخط</p>	<p>Service verified from office copy of the official w.e from 7.4.82 to 30.11.82.</p>	<p>دستخط</p>	<p>دستخط</p>				
<p>B. A. D. A. Bazaar Agency of Khar. II</p>	<p>30-11-83 Annual Increment</p>	<p>Pay fixation in R. P. S. 1982</p> <p>Pay fixed in Basic Pay Scale</p> <p>Rs. 1) 360-20-14</p> <p>At Rs. 500/- M. W. 1.7.1983</p> <p>Next Date of next increment on 1.12.1983</p>	<p>B. A. D. A. Bazaar Agency of Khar. II</p>	<p>دستخط</p>	<p>Service verified from the office copy of the pay Bill of the concerned with effect from 1.12.82 to 30.11.83</p>	<p>دستخط</p>	<p>دستخط</p>				
<p>ASSISTANT COMMISSIONER ACCOUNTS & FINANCE BAZAAR AGENCY KHAR.</p>	<p>دستخط</p>	<p>دستخط</p>	<p>دستخط</p>	<p>دستخط</p>	<p>دستخط</p>	<p>دستخط</p>	<p>دستخط</p>				

1	2	3	4	5	6	7	8
Name of post درجہ ملازمت	Whether substantive or officiating, and whether permanent or temporary عارضی مستقل یا قائم مقام	If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume II اگر عارضی ہے تو کیا وہ رول کے مطابق ہے یا نہیں اس کے مستحق ہے	Pay in substantive post تنخواہ لیٹور عارضی یا قائم مقام	Additional pay for officiating زائد تنخواہ قائم مقام یا قائم مقام	Other emoluments falling under the term "pay" بازرگانی تنخواہ دیگر	Date of appointment تاریخ تقرری	Signature of Government servant دستخط سرکاری ملازم
F. Assn: 3-6-540-20-940	1925 Official Eng Temp.	—	RS. P. —	RS. P. 600/-	—	1-12-85	3
F. Assn: — do —	—	—	—	620/-	—	1-12-86	
F. Assn: 6-725-28-1285	— do —	—	—	337/-	—	1-7-87	
F. Assn: — do —	— do —	—	—	265/-	—	1-12-87	

Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8

دستخط افسر مجاز

Deputy Agent
at Belgaum

Signature

Signature

Signature

Signature

Signature

9	10	11	12	13		14	15	
				LEAVE				
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 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	Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitible 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
					Period	Govt. to which debitible		
دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجوبات انقطاع ملازمت ترقی و تبادلہ یا برطرف	دستخط افسر مجاز	وقت کی نوعیت و معیار	چار ماہ تک کی رعیت کے لئے اوسط دستخطوں کا تعین	گورنمنٹ برائے راجستھان	دستخط افسر مجاز	سزا یا جزا یا غیر سزا بخار کی کوئی کارروائی
Extra Assst. Director of Agrl. Bajaur Agency	Annual pay on 30-11-88					Govt. to which debitible	Service verified from the office copies of pay bill from 1-12-87 to 30-11-88	
Extra Assst. Director of Agrl. Bajaur Agency at Khar	30-11-89						Service verified from the office copy of the pay bill w.e.f. from 1-12-88 to 30-11-89	
Extra Assst. Director of Agrl. Bajaur Agency at Khar	30-11-90						Service verified from the office copy of the pay bill w.e.f. from 1-12-89 to 30-11-90	

ATTESTED

[Signature]

T. 6072311
8/7/91
of award of pay & allowances in office of awarded Selection grade of 2-12-90
to 30-6-91 drawn of Rs. 111-77 +
6932804/77

Genaral Selection Guide in BPS-9 (830-38-1590), w.e.f. from 2-12-90 with rules for Selection Guide in BPS-9 Encl. 50 of DACFATA NWFP, Peshawar with vis. Encl. No 2/18-E311-11070/116/DACFATA dated 24-12-90.

P.T.O

[Signature]

Signature and
Signature of
the Head
of the
Office or other
Attesting
Officer in
attestation
of columns
1 to 8

دستخط افسر
انچارج

M
B

[Signature]

[Signature]
Balour

Name of post درجہ ملازمت	Whether substantive or officiating and whether permanent or temporary عارضی مستقل یا قائم مقام	If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 320 of C.S.R. (Pb.) volume II اگر عارضی ہے تو کیا وہ رول کے مطابق پیش کا مستحق ہے	Pay in substantive post تنخواہ بطور عارضی ملازمت		Additional pay for officiating زائد تنخواہ بطور قائم مقام		Other emoluments falling under the term "pay" ماسوائے تنخواہ دیگر الاؤٹس	Date of appointment تاریخ تقرری	Signature of Government servant دستخط سرکاری ملازم
			RS.	P.	RS.	P.			
7-8-9-1185-72-9265 Asst. Sub. Har. A. H.	Official Har Asst	-			1545/-	-	1/6/91		
do	do	-			1617/-	-	12/9/91		
do	-	-			1688/-	-	12/9/91		

9	10	11	12	13 چھٹی LEAVE		14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 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	Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitible 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

دستخط افسر
مجاز

تاریخ
انقطاع
ملازمت

وجوہات
انقطاع ملازمت
ترقی و تبادلہ
یا برطرفی

دستخط
افسر مجاز

نوعیت و
معیاد

چار ماہ تک کی رخصت
تینے اوسط تنخواہ کا تعین
Govt. to which
debitible
گورنمنٹ سے
رہم ادا ہوگی

دستخط
افسر مجاز

سزا یا سزا یا تادیب
کارکردگی کا ریکارڈ

Allowed M.O. vide
DDA / F.A. No 1672-1739
dt 8-10-2003 at Rs. 10.12
pay fixed Rs. 4875/- on
11/12/2001.

[Signature]
T-266
9/12

paid Rs 7511 on date of
m re-over whd 11/12/2001
T.O. 10

[Signature]
A-10
10/2

ATTESTED
[Signature]
30/11/2003

Service suspended from the pay bill w.e.f
1-12-2002 to 30-11-2003

[Signature]
Sd/-
Salary Agency at Dera

[Signature]
Sd/-
Salary Agency at Dera

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, state-- (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume II	4 Pay in substantive post	5 Additional pay for officiating	6 Other emoluments falling under the term "pay"	7 Date of appointment	8 Signature of Government servant	9 Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8
درجہ ملازمت	عارضی مستقل تقرر مقام	اگر عارضی ہے تو کیا دوروں کے مطابق پیش کا مستحق ہے	تقررہ دینے عارضی ملازمت	رانہ تنخواہ رانہ تنخواہ بطور قائم مقام	- پاسوانے تنخواہ دیگر الائوس	تاریخ تقریری	درجہ ملازمت ملازم	درجہ ملازمت ملازم
BPS-9-2410-145-6750/	Q. Sarajul Haq F.A		RS. P.	5310/		11/12/04		
BPS-9-2770-185-7720/	Sarajul Haq F.A			8070/		1/17/05		
				6235/		1-12-05		
do				6400/		1-12-2006		



8 Signature of Government Servant.	9 Signature and Designation of the head of the office or other attesting officer in attestation of 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 or other attesting officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure or praise of the Government Servant	
					Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debit to another Government			
						Period			Government to which debit to
12/2009			A/O 30/11/2009				Service verified from pay bill w.e from 1/12/2008 to 30/11/2009		
	Agriculture Agency Officer Bajaur Agency At Khar		Agriculture Agency Officer Bajaur Agency At Khar				Agriculture Agency Officer Bajaur Agency At Khar		
12/2010			A/O 30/11/2010				Service verified from pay bill w.e from 1/12/2009 to 30/11/2010		
	Agriculture Agency Officer Bajaur Agency At Khar		Agriculture Agency Officer Bajaur Agency At Khar				Agriculture Agency Officer Bajaur Agency At Khar		
		Pay Revised.							
		30/11/2011							
			Agriculture Agency Officer Bajaur Agency At Khar				Agriculture Agency Officer Bajaur Agency At Khar		
							Service verified from pay bill w.e from 1-12-2010 to 30-11-2011		

ATTESTED

M. A.

Signature of Government Servant

Signature of the head of the office

Signature of the head of the office

OFFICE OF THE DEPUTY DIRECTOR OF AGRICULTURE FATA PESHAWAR.

OFFICE ORDER

In consultation with departmental promotion Committee the Competent authority directed the undersigned to constitute a Committee to allow Move Over to the following Officials of this as well as sub offices to the next higher pay scale from the date noted against their names.

SNo.	Name and Designation	Working in NPS.	Due for Move Over to BPS.	Date of Move over
1	2	3	4	5
<u>BDA (FATA Peshawar.</u>				
1.	Mr. Zulfat Shah S. Clerk.	11	12	1.12.2001
2.	Mr. Liaqat Ali Junior Auditor.	10	11	1.12.2001
3.	Mr. Raz Gul Junior Clerk.	8	9	1.12.2001
4.	Mr. Aman Ullah Junior Clerk.	5	6	1.12.2001
5.	Mr. Hikmat Ullah Junior Clerk.	5	6	1.12.2001
6.	Mr. Azim Khan Naib Qasid.	4	5	1.12.2001
<u>E.A.D.A. Bajour Office.</u>				
1.	Mr. Taj Gul Senior Clerk.	9	10	1.12.2001
2.	Mr. Bakht Rawan. Senior Clerk.	8	9	1.12.2001
3.	Mr. Infar. Ullah Crop Reporter.	5	6	1.12.2001
4.	Mr. Abdul Malik Crop Reporter.	5	6	1.12.2001
5.	Mr. Ghazi Gul Field Asstt.	11	12	1.12.2001
6.	Mr. Main Gul Jan Field Asstt.	11	12	1.12.2001
7.	Mr. Fazli Akbar. Field Asstt.	11	12	1.12.2001
8.	Mr. Khaista Rehman F. Asstt.	10	11	1.12.2001
9.	Mr. Shah Wali Khan.	9	10	1.12.2001
10.	Mr. Sher Mohammad Field Asstt.	9	10	1.12.2001
11.	Mr. Umar Gul Field Asstt.	9	10	1.12.2001
12.	Mr. Siraj Ul Haq Field Asstt.	7	10	1.12.2001
13.	Mr. Mirwas Khan Budder.	6	7	1.12.2001
14.	Mr. Siraj Ud Din Field Asstt.	6	7	1.12.2001
15.	Mrs. Nowroz Khan Budder.	5	6	1.12.2001
16.	Mr. Taj Mohammad Field Worker.	2	3	1.12.2001
17.	Mr. Khawas Khan Field Worker.	2	3	1.12.2001
18.	Mr. Shamshad Naib Qasid.	4	5	1.12.2001
19.	Mr. Said Mohammad. Naib Qasid.	4	5	1.12.2001
20.	Mr. Lal Zada. Chowkidar.	2	3	1.12.2001
<u>E.A.D.A. MOHMAND AGENCY OFFICE.</u>				
1.	Mr. Mukhtayar Khan Assistant.	12	13	1.12.2001
2.	Mr. Ghafar Ali Junior Clerk.	7	8	1.12.2001
3.	Mr. Mujeer Khan Crop Reporter.	6	7	1.12.2001
4.	Mr. Waris Khan Field Asstt.	6	7	1.12.2001
5.	Zahir Ullah Jan Field Asstt.	9	10	1.12.2001
6.	Mr. Habib Khan Budder.	5	6	1.12.2001

ATTESTED

....(2)....

1	2	3	4	5
<u>E.A.D.A. Kurram Agency Office.</u>				
1. Mr. Shahid Hussain Field Asstt;		6	7	1.12.2001
2. Mr. Hidayat Hussain Field Asstt.		6	7	1.12.2001
3. Mr. Iftikhar Hussain Field Asstt.		6	7	1.12.2001
<u>A.D.A. ORAKZAI AGENCY OFFICE.</u>				
1. Mr. Abdur Raziq Senior Clerk.		11	12	1.12.2001
2. Mr. Kawsar Ali Crop Reporter.		5	6	1.12.2001
3. Mr. Aman Ullah Field Asstt;		10	11	1.12.2001
4. Mr. Fazli Mabeed Field Asstt;		10	11	1.12.2001
5. Mr. Alman Ali Field Asstt		7	10	1.12.2001
6. Mr. Ali Issa Budder.		6	7	1.12.2001
7. Mr. Idan Faqir Budder.		6	7	1.12.2001
8. Mr. Habib Ullah Budder.		6	7	1.12.2001
9. Mr. Waris Ali Budder.		6	7	1.12.2001
10. Mr. Waris Khan Budder.		6	7	1.12.2001
11. Mr. Abdul Mateen Driver.		6	7	1.12.2001
<u>E.A.D.A. KHYBER AGENCY OFFICE.</u>				
1. Mr. Anis Ahmad Senior Clerk.		10	11	1.12.2001
2. Mr. Jan Pervez Senior Clerk.		10	11	1.12.2001
3. Mr. Siranjam Khan Junior Clerk.		9	10	1.12.2001
4. Mr. Mubark Shah Field Asstt;		10	11	1.12.2001
5. Mr. Mulik Mir Field Asstt;		6	7	1.12.2001
6. Mr. Habib ullah Field Asstt;		7	8	1.12.2001
7. Mr. Sharafat Khan Field Asstt;		6	7	1.12.2001
8. Mr. Nas Rullah Budder.		7	8	1.12.2001
9. Mr. Iqayat Khan Naib Qasid.		2	3	1.12.2001

Sd/- (ALI AHMAD)
By: Director of Agriculture,
FATA Peshawar.

No. 1672-1739 / DDA FATA Dated Pesh: the 8.12. /2003.

Copy forwarded to:-

1. The Director of Agriculture, FATA Peshawar.
2. The Accountant General PR Sub Office Peshawar.
3. The Agency Account Officer Khyber Agency at Peshawar.
4. The Agency Account Officer Mohamad Agency at Challaai.
5. The Agency Account Officer Bajour Agency at Khar.
6. The Agency Account Officer Kurram Agency at Parachinar.
7. The Agency Account Officer Orakzai Agency at Hungu.
8. The E.Asstt: Director of Agriculture Khyber Agency Peshawar.
9. The E.Asstt: Director of Agriculture, Mohamad Agency at Challaai.
10. The E.Asstt: Director of Agriculture, Bajour Agency at Khar.
11. The E.Asstt: Director of Agriculture, Kurram Agency at Parachinar.
12. The Assistant Director of Agriculture, Orakzai Agency at Kalaya.
13. All the officials concerned.
14. The Pay Bill Clerk Head Quarter Office.
15. The Estt: Asstt: Head Quarter office.

ATTESTED

For information and necessary action please.

By: Director of Agriculture,
FATA Peshawar.

C-14

Confidential

4319

No.12/2/EstV _____ /DG
Dated Peshawar: the 8/4 /2010

To:

The Secretary to Govt. of NWFP,
Agriculture, Livestock and Cooperation
Department, Peshawar.

Subject:
Memo:

PROMOTION / POSTING PROPOSAL

In this regard the following Agricultural Inspector BS-9 were cleared for promotion to the post of Agricultural Officer (BS-17) by Departmental Promotion Committee on 16.3.2010. of Agriculture Extension Department.

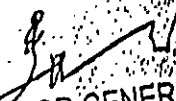
S.No	Name of Agril. Inspector	S.No	Name of Agril. Inspector
1	S. Mazhar Ali Shah	8	Tehseenullah
2	S. Sartaj Ul Hassan	9	Abdul Sattar
3	Noor Rehman	10	Faizur Rehman
4	Sabit Shah	11	Amanullah
5	Fazli Akbar	12	Fazli Mabood
6	Mian Gul Jan	13	Jaffar Khan
7	Ghazi Gul		

Upon their promotion the transfer / posting proposal is submitted for approval and necessary action.

Sl. No.	Name of officer	From	To	Remarks
1	S. Mazhar Ali Shah	Agril. Inspector o/o DOA, DIKhan.	Agricultural Officer, DIKhan	Against the post of Agril. Officer to be vacated by Mr. Ahmad Nawaz promoted to Sup. Post.
2	S. Sartaj Ul Hassan	Agril. Inspector o/o DOA, Hangu	Agril. Officer, Hangu against the vacant post.	On the disposal of FATA for further posting.
3	Noor Rehman	Agril. Inspector o/o AAO, S.W.Agency.	Agril. Officer.	On the disposal of FATA for further posting.
4	Sabit Shah	Agril. Inspector o/o AAO, S.W.Agency.	Agril. Officer.	On the disposal of FATA for further posting.
5	Fazli Akbar	Agril. Inspector o/o DCA, Charsadda.	Agril. Officer.	On the disposal of FATA for further posting.
6	Mian Gul Jan	Agril. Inspector o/o AAO, Bajour Agy.	Agril. Officer.	On the disposal of FATA for further posting.
7	Ghazi Gul	Agril. Inspector o/o AAO, Bajour Agy.	Agril. Officer.	On the disposal of FATA for further posting.
8	Tehseenullah	Agril. Inspector o/o AAO, Mohmand Agy.	Agril. Officer.	On the disposal of FATA for further posting.
9	Abdul Sattar	Agril. Inspector o/o AAO, N.W.Agency.	Agril. Officer, Ghazni Khel, Lakki against the vacant post.	
10	Faizur Rehman	Agril. Inspector o/o AAO, N.W.Agency.	Agril. Officer, Daud Shah, Bannu.	
11	Amanullah	Agril. Inspector o/o AAO, Orakzai Agy.	Agril. Officer.	On the disposal of FATA for further posting.

ATTACHED

12.	Fazli Mabood	Agril. Inspector o/o AAO, Orakzai Agy.	Agril. Officer.	On the disposal of FATA for further posting.
13.	Jaffar Khan	Agril. Inspector o/o DOA, Mardan.	Agril. Officer, Kallang, Mardan against the vacant post.	Against the post to be vacated by Mr. Zainullah Shah promoted to the Supervisory post.
14.	Zahoorud Din	Agril. Officer, Khar, Bajour Agency.	Agril. Officer, Bara, Khyber Agency.	
15.	S. Aqeel Shah	Agril. Officer, Mamond, Bajour Agency.	Agricultural Officer, Dakki o/o DOA, Charsadda: <i>against vacant post</i>	


 DIRECTOR GENERAL
 AGRICULTURE (EXTENSION)
 NWFP, PESHAWAR

15

GOVERNMENT OF KHYBER PAKHTUNKHWA
AGRIL: LIVESTOCK AND COOP: DEPARTMENT:

Dated Peshawar, the 29/6/2010.

NOTIFICATION.

NO. SOE (AD) V-8/2010.- In continuation of this Department's notification of even number dated 22/4/2010, the Competent authority is pleased to order the postings/transfers of the following officers of Agriculture Extension Department in the interest of public service:-

S. No	Name of Officers	From	To
1.	Mr. Noor Rehman	Agril: Inspector o/o Agency Agril: Officer, SW Agency.	Agril: officer (BS-17) o/o Agency Agril: Officer, SW Agency against vacant post.
2.	Mr. Sabit Shah	Agril: Inspector o/o AAO, SW Agency.	Agril: Officer (BS-17) o/o AAO, Wana SW Agency against vacant post.
3.	Mr. Fazli Akbar	Agril: Inspector o/o DOA, Charsadda.	Agril: Officer (BS-17) o/o AAO, Bajaur Agency Salarzai Circle against vacant post.
4.	Mian Gul Jan	Agril: Inspector o/o AAO, Bajaur Agency.	Agril: Officer (BS-17) o/o AAO Bajaur Agency Mohmand Circle against vacant post.
5.	Mr. Ghazi Gul	Agril: Inspector o/o AAO, Bajaur Agency.	Agril: Officer (BS-17) o/o AAO, Bajaur Agency. Vice No.11
6.	Mr. Tehseenullah	Agril: Inspector o/o AAO, Mohmand Agency.	Agril: Officer (BS-17) o/o AAO, Mohmand Agency Ekka Ghund Circle against vacant post.
7.	Mr. Abdul Sattar	Agril: Inspector o/o AAO, NW Agency.	Agril: Officer (BS-17), Ghazni Khel, Lakki Marwat against vacant post.
8.	Mr. Faiz-ur-Rehman	Agril: Inspector o/o AAO, NW Agency.	Agril: Officer (BS-17), Daud Shah, District Bannu against vacant post.
9.	Mr. Amanullah	Agril: Inspector o/o AAO, Orakzai Agency.	Agril: Officer (BS-17) o/o AAO, Mohmand Agency (Pendiali Circle) against vacant post.
10.	Mr. Fazli Mabood	Agril: Inspector o/o AAO, Orakzai Agency.	Agril: Officer (BS-17) o/o AAO, Mohmand Agency Lakkaro Circle against vacant post.
11.	Mr. Zahoorud Din	Agril: Officer, Khar Bajor Agency.	Agril: Officer, Bara Khyber Agency against vacant post.
12.	S. Aqcel Shah	Agril: Officer o/o AAO, Bajour Agency.	Agril: Officer, Dakki o/o DOA, Charsadda against vacant post.

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
AGRIL: L/STOCK AND COOP: DEPTT:**

Endst. of even No. & Date.

Copy forwarded for information and necessary action to:-

1. The Director General, Agriculture (Extension) Khyber Pakhtunkhwa, Peshawar.
2. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. The Additional Accountant General (PR) Sub-Office, Peshawar.
4. The Director, Agriculture (Extension), FATA, Khyber Pakhtunkhwa, Peshawar.
5. The Section Officer (Estab) FATA Secretariat, Khyber Pakhtunkhwa, Warsak Road, Peshawar.
6. All the Agency Agril: Officers in Khyber Pakhtunkhwa.
7. All the Agency Accounts Officers in Khyber Pakhtunkhwa.
8. The District Accounts Officers, Bannu, Lakki Marwat and Charsadda.
9. Officers concerned.
10. Personal file of the Officers.
11. PS to Minister for Agriculture, Khyber Pakhtunkhwa.
12. PS to Chief Secretary, Khyber Pakhtunkhwa.
13. PS to Secretary Agriculture, Pakhtunkhwa.


(SAKHI-UR-REHMAN)
SECTION OFFICER-ESTT:

ATTESTED

D-16

FINAL SENIORITY LIST OF AGRICULTURAL INSPECTORS AGRICULTURE EXTENSION DEPARTMENT AS IT STOOD ON 1.11.2009 (IN LIGHT OF THE NWFP SERVICE TRIBUNAL, PESHAWAR) DATED 5.11.2008

S.No.	NAME OF AGRICULTURAL INSPECTOR	QUALIFICATION	HOME DISTRICT	DATE OF BIRTH	DATE OF 1ST APPOINTMENT	DATE OF PROMOTION AS AGRI. INSPECTORS.	PLACE OF POSTING
1.	S. Mazhar Ali Shah	M.Sc (Hons)	D.I.Khan.	13.7.1957	15.6.1988	21.8.1998	DOA, D.I.Khan
2.	S. Sartajul Hussain	Matric	Hangu	1.5.1955	2.7.1973	26.10.2000	DOA, Hangu
3.	Mr. Asmatullah	Matric	D.I.Khan	2.1.1950	21.12.1972	15.12.2000	DOA, D.I.Khan
4.	Mr. Noor Rehman	Matric	S.W. Agency.	15.1.1952	3.5.1973	13.11.2003	AAO, S.W. Agency.
5.	Mr. Sabit Shah	Matric	FR-D.I.Khan.	10.1.1952	8.9.1973	13.11.2003	AAO, S.W. Agency.
6.	Mr. Fazli Akbar	Matric	Bajour Agency	15.12.1953	3.6.1974	13.11.2003	DOA, Charsadda
7.	Mian Gul Jan	Matric	Bajour Agency	10.4.1954	3.6.1974	13.11.2003	AAO, Bajour Agency
8.	Mr. Ghazi Gul	Matric	Bajour Agency	7.8.1954	3.6.1974	13.11.2003	AAO, Bajour Agency
9.	Mr. Tehsinullah	Matric	Charsadda	9.1.1958	13.6.1977	13.11.2003	AAO, Mohmand Agency.
10.	Mr. Abdul Sattar	Matric	FR-Bannu	10.10.1959	26.7.1977	13.11.2003	AAO, N.W. Agency.
11.	Mr. Faizur Rehman	Matric	Bannu	15.5.1957	26.10.1978	13.11.2003	AAO, N.W. Agency.
12.	Mr. Amanullah	Matric	Charsadda	4.4.1954	4.11.1978	13.11.2003	AAO, Orakzai Agency.
13.	Mr. Fazli Mabood	Matric	Charsadda	10.12.1954	23.11.1978	13.11.2003	AAO, Orakzai Agency.
14.	Mr. Jaffar Khan	Matric	Mardan	15.5.1951	24.11.1972	13.5.2006	DOA, Mardan
15.	Mr. Alamzeb	Matric	Mardan	28.8.1950	25.11.1972	13.5.2006	DOA, Mardan
16.	Mr. Safdar Ali	Matric	Swabi	10.1.1951	24.11.1972	19.7.2006	DOA, Swabi
17.	Mr. Rehmanullah	Matric	Bannu	3.5.1952	6.5.1974	9.9.2006	DOA, D.I.Khan
18.	Mr. Shafiullah	Matric	Lakki Marwat	15.9.1953	6.5.1974	9.9.2006	DOA, Lakki Marwat
19.	Mr. Gul Sher Khan	Matric	D.I.Khan	5.1.1957	1.8.1975	9.9.2006	DOA, D.I.Khan
20.	Mr. Abdur Razaq	Matric	D.I.Khan	1.9.1954	25.6.1976	9.9.2006	DOA, D.I.Khan
21.	Mr. Saifullah Khan	Matric	Lakki Marwat	1.5.1956	23.7.1977	9.9.2006	DOA, Lakki Marwat
22.	Mr. Adil Hosh	M.A.	Swat	1.1.1950	31.7.1973	23.9.2006	DOA, Mardan
23.	Mr. Jamshid Khan	Matric	Swat	3.2.1950	10.7.1974	23.9.2006	DOA, Mardan

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24.	Mr. Muhammad Ali Rehman	Matric	Swat	1.4.1953	11.7.1974	23.9.2006	DOA. Mkd Agency
25.	Mr. Fazl Rookhan	Matric	Peshawar	12.11.1951	25.11.1972	7.8.2007	DOA. Peshawar
26.	Mr. Hashim Jan	Matric	Peshawar	25.4.1951	27.11.1972	7.8.2007	DOA. Peshawar
27.	Mr. Gul Sambar Khan	Matric	Chitral	15.11.1951	25.7.1975	15.1.2008	DOA. Chitral
28.	Mr. Muhammad Iqbal	F.A.	Chitral	1.3.1954	25.7.1975	15.1.2008	DOA. Chitral
29.	Mr. Zaid Said	Matric	Dir	10.5.1952	21.10.74	15.1.2008	DOA. Malakand
30.	Mr. Hidayatullah	M.A.	Karak	1.4.1963	27.8.1983	14.2.2008	DOA. Hangu
31.	Mr. Sher Afzal	B.A.	Karak	1.5.1963	27.8.1983	14.2.2008	DOA. Karak
32.	Mr. Badam Gul	Matric	Swabi	3.5.1951	24.11.1972	26.4.2008	DOA. Swabi
33.	Mr. Mubaraik Shah	Matric	Peshawar	15.4.1958	2.11.1978	23.5.2008	AAO, N.W. Agy
34.	Mr. Ghulam Dastagir	Matric	Bannu	4.3.1956	16.8.1980	3.5.2008	AAO, S.W. Agy
35.	Mr. Mumtaz Ali	Matric	Mardan	13.4.1951	25.11.1972	20.8.2008	DOA, Mardan
36.	Mr. Abdur Rahim	Matric	Battagram	14.6.1954	23.7.1975	22.1.2009	DOA, Abbottabad
37.	Mr. Khalid Ahmad	Matric	Mansehra	9.9.1950	28.7.1975	22.1.2009	DOA, Mansehra
38.	Mr. Nausher Ali	Matric	Battagram	2.6.1953	29.7.1975	22.1.2009	DOA, Battagram
39.	Mr. Muhammad Riaz	Matric	Mansehra	25.5.1956	29.7.1975	22.1.2009	DOA, Abbottabad
40.	Mr. Ahmad Nawaz	Matric	Mansehra	12.9.1956	5.8.1975	22.1.2009	DOA, Haripur
41.	Mr. Muhammad Anwar	Matric	Swabi	28.9.1951	25.11.1972	2.2.2009	DOA, Swabi
42.	Mr. Muhammad Sher	Matric	Mardan	5.3.1951	27.11.1972	2.2.2009	DOA, Mardan
43.	Mr. Muhammad Shuaib	B.A.	Swat	4.2.1953	3.7.1974	24.4.2009	DOA, Malakand
44.	Mr. Gul Baz	B.A.	Shangla	1.6.1952	19.6.1976	24.4.2009	DOA. Malakand



DIRECTOR GENERAL
 AGRICULTURE (EXTENSION)
 NWFP, PESHAWAR.

ATTESTED

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E-18

STATEMENT SHOWING THE DETAIL OF SENIORITY LIST OF FIELD ASSISTANT OF THE OFFICE OF EADA BAJAUR.

S.NO.	NAME OF OFFICIALS	FATHER NAME.	DESIGNATION	BPS.	DATE OF BIRTH	DATE OF APPOINTMENT	PLACE OF DOMICILE. POSTING.	PAY.
							M/Shah. Bajaur.	8315/-
1)	Mr. Fazli Akber	Said Akber Khan.	A/I	9	15.12.1953.	3.6.74.	khar "	8315/-
2)	Mr. Mian Gul Jan.	Pinda Gul Jan.	A/I	9	10.4.1954.	3.6.74.	pashad "	8315/-
3)	Mr. Ghzi Gul		A/I	9	7.8.1954.	3.6.74.	khar. "	7555/-
4)	Mr. Khaista Rehman.	Mir Alam Shah	F/Asstt;	9	5.5.1960	8.6.1981	Inayat killi "	7745/-
5)	Mr. Mutahir Shah	Laiq Shah.	"	9	9.4.1964	14.5.85.	khar "	7555/-
6)	Mr. Sher Mohd;	Gul Amin	"	9	4.3.1957	8.6.81	Nawagai. "	7555/-
7)	Mr. Umer Gul	Niamat Rasool	"	9	6.6.1963	8.6.1981	khar "	7555/-
8)	Mr. Sultan Mohd;	Said Mohd;	"	9	18.10.1966.	20.5.1985	Kolala "	7555/-
9)	Mr. Shah Wali Khan	Mohd Yousaf	"	9	20.2.1961	8.7.1982.	Sikandro "	7175/-
10)	Mr. Sham Sher	Bakhti Rehman	"	9	13.2.1965.	10.6.1984.	Inayat killi "	7555/-
11)	Mr. Sirajul Haq	Abdul Manan	"	9	10.2.1963	7.8.1982.	khar "	7175/-
12)	Mr. Shahfiullah.	Kherullah.	"	9	4.9.1963	14.6.1983	" "	7175/-
13)	Mr. Ghousur Rehman	Amanullah	"	9	15.7.1966.	21.5.1985.	Sikandro "	7175/-
14)	Mr. Umer khakim	Ajab Khan	"	9	5.1.1966.	21.5.1985.	Loy sum "	7745/-
15)	Mr. Rahat Jan.	Mohd Jan.	"	9	16.6.1965.	11.6.1984.	" "	6340/-
16)	Mr. Badshah Rehman.	Amin Jan.	"	6	13.3.1963.	1.12.1987.	M/Shah. "	6195/-
17)	Mr. Sirajudin	Abdulalh Jan.	"	6	17.6.1967.	4.9.1986.	Nawagai. x "	5180/-
18)	Mr. Noor Zarin Khan	Mohd. Zarin	"	6	25.1.1970	24.3.1992.	Ragghan. "	5905/-
19)	Mr. Mohd Hussain.	Gul Mohd Khan	"	6	1.6.1969.	8.6.1988.	Derakai "	5905/-
20)	Mr. Mohd Nawaz Khan	Habib Rehman.	"	6	1.2.1970	18.3.1991	FSC Ragghan "	4745/-
21)	Mr. Sahi Gul	Habibullah Khan	"	6	2.12.1972	23.11.1997.	Ragghan. "	5180/-
22)	Mr. Nurul Amin.	Sher Bahader	"	6	19.2.1972.	23.3.1997.	pashat. "	4455/-
23)	Mr. Mohd Roz	Mian Gul	"	6	4.1.1970.	23.1.1997.	Derakai. "	3730/-
24)	Mr. Toor Gul	Mohd Ali Jan	"	6	11.4.1981	17.3.2002	Takho. "	3730/-
25)	Mr. Shakil Ahmad	HabiulRehman.	"	6	14.3.1974.	1987.	Mamund "	

Extra Asstt; Director Agriculture, Bajaur Agency at khar.

NO 306 / EADA Bajaur dated khar 19/3/2008.

Copy Forwarded to the Director of Agriculture FATA, Peshawar for information and N/action please.

Extra Asstt; Director Agriculture, Bajaur Agency at khar.

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	Agriculture Officers / Agriculture Officers Public Relation and Publication and Instructors (BPS-17).	At least 2 nd Division M.Sc/ B.Sc (Hons) Degree in Agriculture from a recognized Agricultural University.	21 to 32 years.	a). Twenty-five percent by promotion, on the basis of seniority cum fitness, from amongst the holders of the post of Agricultural <u>Inspectors</u> with at least fifteen years service as Agricultural Inspector and Field Assistant; and b). seventy-five per cent by initial recruitment.
5	Instructor Islamiyat (BPS-16).	Molvi Fazil or Sanadul Faraghat from Wafaqi Madrasa or equivalent sanad from a recognized religious institution.	21 to 32 years.	By initial recruitment.
6	Equipment Engineers (BPS-16).	(a) Secondary School Certificate from a recognized Board; and (b) Diploma in Electronics from a recognized Polytechnic Institute or College of Technology with two years experienced of Audio Video equipment installation maintenance and repair with sufficient knowledge of handling such equipment.	18 to 28 years.	By initial recruitment.
7	Artists (BPS-11).	(a) Secondary School Certificate from a recognized Board; and (b) Diploma or certificate in fine art from a recognized institute with two years experience of commercial art.	18 to 28 years.	By initial recruitment.
8	Electricians (BPS-11).	(a) Secondary School Certificate from a recognized Board; and (b) Diploma in Electrical from a recognized Institute with appropriate technical knowledge of repairs, maintenance and handling of Electric Supply / Lines / equipment.	18 to 28 years.	By initial recruitment.
9	Penal Operators (BPS-11).	(a) Secondary School Certificate from a recognized Board; and (b) Diploma in Electronics from a recognized Institute with sufficient knowledge of handling console / audio video equipment and its repair and maintenance.	18 to 28 years.	By initial recruitment.
10	Physical Instructors (BS-11).	Secondary School Certificate from a recognized Board with junior Diploma in physical education or Ex-Service man who hold Secondary School Certificate and served the defence force for at least five years as non-commission officer.	18 to 28 years.	By initial recruitment.
11	Photographers (BS-11).	(a) Secondary School Certificate from a recognized Board; and (b) Certificate in <i>Photography from a</i>	18 to 28 years.	By initial recruitment.

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12	Video Camera Operators (BPS-10).	with three years experience in portrait / landscape photography with appropriate knowledge and practice of commercial photography. At least 2 nd Division Secondary School Certificate from a recognized Board with four years experience in Outdoor Photography, Documentary, Editing and Commercial.	18 to 28 years.	By initial recruitment.
13	Artist-cum-Photographers (BSPS-9).	Diploma in Arts from a recognized Institute of Arts with sufficient experience in photography.	18 to 28 years.	By initial recruitment.
14	Agriculture Inspectors (BPS-9).			By promotion on the basis of seniority-cum-fitness from amongst Field Assistants with at least five years service as such.
15	Field Assistants (BPS-6).	(a) At least 2 nd Division in Secondary School Certificate with science from a recognized Board, and (b) Certificate of passing two years training course from Agricultural Training Institute.	18 to 28 years.	By initial recruitment.
16	Stock Assistants (BPS-6).	(a) At least 2 nd Division in Secondary School Certificate with science from a recognized Board; and (b) Certificate of passing two years training course from Agricultural Training Institute.	18 to 28 years.	By initial recruitment.
17	Laboratory Assistants (BPS-6).	At least 2 nd Division in Secondary School Certificate with science from a recognized Board.	18 to 28 years.	(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Laboratory Attendants with three years service as such, having Secondary School Certificate with science from a recognized Board; and (b) Fifty percent by initial recruitment.
18	Pharmacy Technicians (BPS-9).	Secondary School Certificate from a recognized Board with Dispenser Certificate from Health Department.	--	By initial recruitment.
19	Heavy Duty Driver (BPS-6).	Experience in driving having heavy vehicle driving licence.	18 to 40 years.	By initial recruitment.
20	Driver-Cum-Operator (BPS-6).	Middle pass having heavy Motor driving licence and experience in handling projector.	18 to 40 years.	By promotion, on the basis of seniority-cum-fitness, from amongst the vehicle drivers with three years experience.
21	Projectionist-cum-Drivers (BS-6).	Literate possessing a valid driving licence and having three years experience in a relevant field. Note:- preference will be given to the holders of certificate in film projection.	18 to 32 years.	By initial recruitment.
22	Mechanics (BPS-5).	--	--	By transfer from amongst Fitter with three years service as such.
23	Fitters (BPS-5).	Middle pass certificate from a recognized Institute.	18 to 28 years.	By initial recruitment.
24	Budders (BPS-5).	Meddle pass with experience in budding.	18 to 40 years.	By promotion from amongst Field Worker/ Malies and Attendants.
25	Electricians (BPS-5).	Secondary School Certificate from a	18 to 40 years.	By initial recruitment.

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26	Tractor Drivers (BPS-5).	recognized Board with certificate as Electrician. Having tractor driving licence with two years experience in handling Tractor.	18 to 40 years.	By initial recruitment.
27	Vehicle Drivers (BPS-4).	Experience in Driving with light vehicle driving licence.	18 to 40 years.	By initial recruitment.
28	Thresher Operators (BPS-3).	Middle pass one year experience in the Thresher Operator.	18 to 40 years.	By initial recruitment.
29	Tube Well Operators (BPS-1).	Two years experience in the operating tube wells.	18 to 45 years.	By initial recruitment.
30	Tractor Cleaners / Helpers of Driver (BPS-1).	One year experience as Cleaner	18 to 45 years	By initial recruitment.
31	Malies (BPS-1).	Experience in flower culture and horticulture.	18 to 45 years.	By initial recruitment.
32	Carpenters (BPS-1).	Five years experience as carpenter.	18 to 45 years.	By initial recruitment.
33	Field Workers / Cook / Depot Colies / Laboratory Attendants / Mess Boys & Sweeper (BPS-1).	Experience in the relevant field.	18 to 45 years.	By initial recruitment.

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PART-II
MINISTERIAL STAFF

34	Assistant Accounts Officers (BPS-17).			By promotion, on the basis of seniority- cum-fitness, from amongst the holders of the posts of Administrative Officers / Superintendents.
35	Administrative Officers (BPS-16).			"By transfer from amongst the Superintendents"
36	Superintendents (BPS-16).			a). Ninety percent by promotion, on the basis of seniority- cum-fitness, from amongst the holders of the posts of Assistant / Accountants with five years service as such; and b). ten percent by promotion, on the basis of seniority- cum-fitness, from Senior Scale Stenographers with five years service as such.
37	Senior Scale Stenographers (BS-15).			By promotion, on the basis of seniority-cum-fitness, from amongst Junior Scale. Stenographers / Computer Operators with three years service as such.
38	Assistants / Accountants (BPS-14).	At least 2 nd Division Bachelor's Degree from a recognized University	18 to 28 years.	(a). Seventy-five percent by promotion, on the basis of seniority-cum-fitness, from Senior Auditors / Seniors Clerks with three years service as such; and (b). twenty-five percent by initial recruitment.
39	Junior Scale Stenographers (BPS-12).	(a). Secondary School Certificate or an equivalent qualification from a recognized Board; and (b). a speed of eighty words per minute in shorthand in English and thirty-five words per minute in typing.	18 to 28 years.	By initial recruitment.
40	Computer Operators (BS-12).	At least 2 nd Division Bachelor's Degree from a recognized university with one year diploma in Information Technology	18 to 28 years	By initial recruitment.
41	Video Camera Operator (BPS-10).	At least 2 nd Division Secondary School Certificate with two years experience in Outdoor Seismograph	18 to 28 years.	By initial recruitment.

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[Signature]

42	Senior Clerks (BPS-9).	Documentary Editing and Commercial.		By promotion, on the basis of seniority-cum-fitness, from amongst Junior Clerks / Time Keepers / Store Keepers and Depot Keepers with two years service as such.
43	Senior Auditors (BPS-8).			By promotion, on the basis of seniority-cum-fitness, from amongst Junior Auditors with two years service as such.
44	Junior Clerks (BSPS-7).	(a) Secondary School Certificate or an equivalent qualification from a recognized Board; and (b) a speed of thirty words per minute in typing.	18 to 28 years.	(a) Thirty-three percent by promotion, on the basis of seniority-cum-fitness, from amongst the holders of all Class-IV posts provided that they possess secondary school certificate with two years service as such; and (b) Sixty-seven percent by initial recruitment.
45	Junior Auditors (BPS-6).	Secondary School Certificate or an equivalent qualification from a recognized Board.	18 to 28 years.	By initial recruitment.
46	Store Keepers/Time Keepers and Depot keepers (BPS-5).	Secondary School Certificate or an equivalent qualification from a recognized Board.	18 to 28 years.	By initial recruitment.
47	Calligraphers (BPS-5).	Three years experience in the art of calligraphy.	18 to 32 years.	By initial recruitment.
48	Daftaries (BPS-2).	Middle Pass.	18 to 45 years.	By promotion, from amongst Naib Qasids who are middle passed.
49	Naib Qasids (BPS-1).	Preferably literate.	18 to 45 years.	By initial recruitment.
50	Chowkidars and Security Guards (BPS-1).	Having experienced in watch and ward duty.	18 to 45 years.	By initial recruitment.

SECRETARY TO GOVERNMENT OF
THE KHYBER PAKHTUNKHWA,
ACRIL: LIVESTOCK AND COOP: DEPARTMENT.

Endst. of even No. & Date.

Copy forwarded for information and necessary action to:-

1. The Secretary to Govt. of Khyber Pakhtunkhwa Establishment Department.
2. The Secretary to Govt. of Khyber Pakhtunkhwa Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa Law Department w/r to his letter No.LD/REG/1(6)76/Vol-II dated 06.01.2012.
4. The Accountant General, Khyber Pakhtunkhwa.
5. The All District Coordination Officers, Khyber Pakhtunkhwa.
6. The All Executive District Officers (Agriculture), Khyber Pakhtunkhwa.
7. The Secretary to Governor, Khyber Pakhtunkhwa.
8. The PSO to Chief Minister, Khyber Pakhtunkhwa.
9. The PSO to Chief Secretary, Khyber Pakhtunkhwa.
10. The PS to Additional Chief Secretary, FATA, Warsak Road, Peshawar.
11. The PS to Minister for Agriculture, Khyber Pakhtunkhwa.
12. The Director General, Agricultural (Extension), Khyber Pakhtunkhwa, Peshawar
13. The Manager Govt. Printing Press, Khyber Pakhtunkhwa, Peshawar. He is requested that printed (preferable gazette) copies of the notification as and when published may be furnished to this Department, E&A and Law Department along with details of gazette in which is published.
14. PS to Secretary Agriculture.

ATTESTED

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(MUHAMMAD ZAHID)
SECTION OFFICER-ESTT

3
 Agricultural Training Institute of at least one year.

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*SCHEDULE - 1
 (See rule 2)

Nomenclature of Post	Minimum qualification prescribed for appointment by initial recruitment or by transfer	Minimum qualification prescribed for appointment by promotion	Age Limit for initial recruitment	Method of recruitment
2	3	4	5	6

EXTENSION WING

Director General (Extension)

By selection on merit from amongst three senior most officers of the Extension Wing in B-19.
 Seniority being considered only in case of officers of practically the same standard of merit.

Project Director / Principal

(i) By selection on merit from amongst six senior most officers of the Extension Wing in B-18.
 Seniority being considered in the case of officers of practically the same standard of merit or

Deputy Director Agriculture/
 Deputy Director Agriculture
 (Economic and Marketing)
 Agronomist / Economist /
 Plant Protection Officer/Ser-
 ior Subject Specialist/Senic
 Instructor.

(ii) by transfer.
 By promotion on the basis of seniority-cum-fitness from amongst the officers holding any of the posts specified at serial No. 6 with at least five years service as such in the Extension Wing.

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1	2	3	4	5	6
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4. Statistician

By promotion on the basis of seniority-cum-fitness from amongst Assistant Statistical Officers in the Extension Wing with at least five years experience in planning agricultural experiments and processing the data obtained therefrom.

5. Horticultural Officer

By promotion on the basis of seniority-cum-fitness from amongst Assistant Horticultural Officers with at least five years service as such:

6. Extra Assistant Director Agriculture/Extra Assistant Director Agriculture (Economic and Marketing/Assistant Plant Protection Officer/Assistant Agronomist/Assistant Publicity Officer/Subject Specialist/Junior Instructor (Supervisory).

By promotion on the basis of seniority-cum-fitness from amongst Agricultural Officer who have at least five years service as such.

7. Assistant Horticultural Officer

M.Sc. Agri. or equivalent qualification with specialization in Horticulture from a recognised University.

21 to 35 years

By initial recruitment.

8. Agricultural Officer

M.Sc. Agri. or equivalent qualification from a recognised University.

21 to 35 years

- (a) Secondary School Certificate or equivalent Certificate from a recognised Board; and
- (b) Certificate of passing training course from Agricultural Training Institute of at least one year.

- (i) Seventy five per cent by initial recruitment; and
- (ii) twenty five per cent by promotion, on the basis of seniority-cum-fitness from amongst the holders of the post of Agricultural Inspector with at least fifteen years total service as Agricultural Inspector and Field Assistant.

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15. Agriculture Inspector

(a) Secondary School Certificate or equivalent from a recognised

By promotion on the basis of seniority-cum-fitness from amongst Field Assistants with at least five years service as such.

1	2	3	4	5	6
9.	Assistant Statistical Officer	Master Degree in Statistics or Maths or Economics with specialization in Statistics from a recognised University.		21 to 28 years	(a) Fifty per cent by initial recruitment; and (b) Fifty per cent by promotion on the basis of seniority-cum-fitness from amongst Statistical Investigators with at least five years service as such.
10.	Agricultural Research Officer	B.Sc. Agri. from a recognised University.		21 to 28 years	By initial recruitment.
11.	Statistical Investigator	M.Sc. in Statistics, Maths, or Economics with Statistics as one of the subject from a recognised University.		21 to 35 years	(a) Seventy five per cent by initial recruitment; and (b) twenty five per cent by promotion on the basis of seniority-cum-fitness from amongst Statistical Computers/Crop Reporters with at least ten years experience of working in the Statistical Cell.
12.	Communication Media Technician	(i) B.Sc. Agri. from a recognised University; or (ii) B.A. from a recognised University with diploma in Journalism from a recognised Institute; or (iii) Diploma in Journalism from a recognised Institute and one year experience in Publicity work in Government/ Semi Government Organization.		21 to 28 years	(a) By promotion on the basis of seniority-cum-fitness from amongst Technical Writers, having at least three years service as such; or (b) If no suitable candidate is available then by initial recruitment.
13.	Physical Instructor	(i) Secondary School Certificate from a recognised Board with Junior Diploma in Physical Education; or		20 to 40 years	By initial recruitment.

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(ii) Ex-serviceman who holds Secondary School Certificate and has served the Defence Force for at least five years as non-commissioned Officer (NCO).

14. Technical Writer

- (i) Graduate at least 2nd Division from a recognised University; or
- (ii) Diploma in Journalism from a recognised Institute; or
- (iii) Field Assistant Training Course from Agricultural Training Institute, Peshawar with two years experience of writing Technical Articles for Agriculture Magazines / Newspapers / Radio/T.V.

21 to 28 years

- (a) Fifty per cent by initial recruitment; and
- (b) fifty per cent by promotion on the basis of seniority-cum-fitness from amongst the holders of the posts of Copies/proof Readers/Translators; or
- (c) by transfer if no suitable person is available for promotion.

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Note: Preference will be given to Pushto writers.

15. Agriculture Inspector

- (a) Secondary School Certificate or equivalent from a recognised Board/University and

By promotion on the basis of seniority-cum-fitness from amongst Field Assistants with at least five years service as such

Board with certificate in Poultry from a recognised Institute.

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(31)

1	2	3	4	5	6
16.	Artist cum Photographer	Diploma in Arts from a recognised Institute of Arts with sufficient experience in photography.	..	18 to 25 years	By initial recruitment.
17.	Field Assistant	(a) Secondary School Certificate from a recognised Board; and (b) Certificate of passing training course from Agricultural Training Institute of at least one year's duration	..	18 to 25 years	By initial recruitment.
18.	Mechanic	Middle pass	By promotion from amongst fitters of the department with at least three years service as such.
19.	Laboratory Assistant	Secondary School Certificate with Science from a recognised Board.	Secondary School Certificate with Science from a recognised Board.	18 to 25 years	(a) Fifty per cent by initial recruitment; and (b) fifty per cent by promotion on the basis of seniority-cum-fitness from amongst Laboratory Attendants with at least three years service as such.
20.	Veterinary Compounder	Secondary School Certificate with Science from a recognised Board with Veterinary Course from a recognised Government Institute.	..	18 to 25 years	By initial recruitment.

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laboratory Attendant / Milkman /
Plough-man / Gross Cutter /
Bee Attendant / Mess Boy /
Sweepers

27.	Statistical Computer / Crop Reporter.	Secondary School Certificate from a recognised Board; or Trained Field Assistant from Agricultural Training Institute, Peshawar.	18 to 25 years	By initial recruitment.
28.	Junior Clerk/Time Keeper/ Store Keeper	Secondary School Certificate or an equivalent qualification from a recognised Board.	18 to 25 years	(a) Seventy five per cent by initial recruitment; and (b) Twenty five per cent by promotion on the basis of seniority-cum-fitness from amongst the holders of the posts of Naib Qasids and Daftri with two years service as such. In case qualified persons are not available for promotion, then the vacancies shall be filled in by initial recruitment.
29.	Fitter	Middle pass with Certificate in the line from a recognised Institute.	18 to 25 years	By initial recruitment.
30.	Budders	Middle pass with experience in Budding.	18 to 40 years	By promotion from Field Worker, Malies and Attendants of the Department.
31.	Electrician	Secondary School Certificate from a recognised Board with certificate as Electrician	18 to 40 years	By initial recruitment.
32.	Jeep Driver	Experience in driving with light vehicle driving licence.	18 to 40 years	By initial recruitment.
33.	Tractor Driver	Having Tractor Driving Licence with two years experience in handling Tractor.	18 to 40 years	By initial recruitment.

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[Signature]

To

2 - (35)

The Additional Chief Secretary FATA,
FATA Secretariat, KPK Peshawar.

**SUBJECT: DEPARTMENTAL APPEAL FOR THE GRANT
OF PROMOTION FROM FIELD ASSISTANT
TO AGRICULTURE INSPECTOR ON
REGULAR BASIS AND AGAINST THE
NOTIFICATION DATED 30.6.2011
WHEREBY THE PROMOTION AND
UPGRADATION OF THE APPELLANT HAS
BEEN SUCCUMBED**

R.SHEWETH:

- 1- That appellant has joined the agriculture Department as Field Assistant (BPS-06) vide order dated 7.8.1982. That right from appointment till date appellant performing his duty quite efficiently and up to the entire satisfaction of his superiors.
- 2- That appellant has served the Department for more than 30 years as Field assistant. That despite of having experience and seniority the appellant has not been promoted to the post of Agriculture Inspector (BPS-11) till date though many other junior colleagues of the appellant has now been working as Agriculture Officers (BPS-17) but the appellant having more than 30 years service and being senior most employee and eligible for promotion has not been promoted till date to the post of Agriculture Inspector (BPS-11).
- 3- That despite of that the respondent Department has issued Notification dated 30.6.2011 due to which the chances of promotion to the post of Agriculture Inspector (BPS-11) has been attached with the condition that " 33% of total sanctioned posts of Agriculture inspector be allowed BPS-11 to BPS-14 as Agriculture supervisor in each wing of Agriculture Department subject to minimum service of 15 years service as Agriculture Inspector or Field Assistant iv- the curriculum of Field Assistant class will be revised and duration of the course will be enhanced from two years to three years (diploma course) for field Assistant and v- six months condensed course in the relevant field in the respective wing of the agriculture Department will be conducted for in-service staff and they will clear the examination in two terms otherwise they will be compulsory retired from service".

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR
AMENDED PAGE NO.1

IN APPEAL NO. 1016 /2013

28/2/2014

Mr. Siraj-ul-Haq, Field Assistant (BPS-09),
O/O the Agency Agriculture Officer, Bajaur at Khar

----- **APPELLANT**

VERSUS

- 1- The Additional Chief Secretary FATA, FATA Secretariat Warsak Road, Khyber Pakhtunkhwa Peshawar.
- 2- The Director Agriculture Department FATA, FATA Secretariat Warsak Road, Khyber Pakhtunkhwa Peshawar.
- 3- The Agency Agriculture Officer, Bajaur at Khar.
- 4- Mr. Mazhar Ali shah, Agriculture Officer, C/O Directorate of FATA, Agriculture Department.
- 5- Mr. Hidayatullah, Agriculture Officer, C/O Directorate of FATA, Agriculture Department.
- 6- Mr. Sher Afzal, Agriculture Officer, C/O Directorate of FATA, Agriculture Department.

.....**RESPONDENTS**

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 30-06-2011 AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF NINETY DAYS

PRAYERS:

That on acceptance of this appeal the respondents may very kindly be directed to rectify/modify the impugned Notification dated 30-06-2011 to the extent of appellant and the respondents may further please be directed to consider the appellant for regular promotion to the post of Agriculture Inspector from the date when appellant colleagues/junior colleagues were promoted. Any other remedy which this august Service Tribunal deems fit that also be awarded in favor of the appellant.

R/SHEWETH:

- 1- That appellant has joined respondent Department as field Assistant (BPS-06) vide order dated 7-8-1982. That right from appointment till date the appellant is performing his duty quite efficiently and up to the entire satisfaction of his superiors. Copy of the service book is attached as annexure **A.**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 10/6 /2013

SIRAJ UL HAQ

VS

A.C.S FATA

INDEX

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APPELLANT

THROUGH:


NOOR MOHAMMAD KHATTAK
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO 1016 /2013

K.W.P. Peshawar
10/29
07-6-13

Mr. Siraj Ul Haq, Field Assistant (BPS-09),
O/O the Agency Agriculture Officer Bajaur at Khar

..... APPELLANT

VERSUS

- 1- The Additional Chief Secretary FATA, FATA Secretariat Warsak Road, Khyber Pakhtunkhwa Peshawar.
- 2- The Director Agriculture Department FATA, FATA Secretariat Warsak Road, Khyber Pakhtunkhwa Peshawar.
- 3- The Agency Agriculture Officer, Bajaur at Khar.
- 4- Mr. Mazhar Ali Shah, Agriculture Officer, C/O Directorate of Agriculture Department.
- 5- Mr. Hidayatullah, Agriculture Officer, C/O Directorate of Agriculture Department.
- 6- Mr. Sher Afzal, Agriculture Officer, C/O Directorate of Agriculture Department.

..... RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 FOR DIRECTING THE RESPONDENTS TO REGULARLY PROMOTE THE APPELLANT TO THE POST OF AGRICULTURE INSPECTOR FROM THE DATE WHEN APPELLANT COLLEAGUES AND JUNIOR COLLEAGUES WERE PROMOTED AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN STATUTORY PERIOD OF NINETY DAYS

PRAYER:

That on acceptance of this appeal the respondents may very kindly be directed to set aside the impugned Notification dated 30.6.2011 being illegal and the respondents may further please be directed to regularly promote the appellant on the post of Agriculture Inspector from the date when appellant colleagues/junior colleagues were promoted. Any other remedy which this august Service Tribunal deems fit that may also be awarded in favour of the appellant.

R/SHEWETH:

- 1- That appellant has joined respondent Department as field Assistant (BPS-6) vide order dated 7.8.1982. That right from appointment till date appellant performing his duty quite efficiently and up to the entire satisfaction of his superiors. Copy of the service book is attached as annexure A.

....(2)....

1	2	3	4	5
<u>E.A.D.A. Kurram Agency Office.</u>				
1. Mr. Shahid Hussain Field Asstt;		6	7	1.12.2001
2. Mr. Hidayat Hussain Field Asstt.		6	7	1.12.2001
3. Mr. Iftikhar Hussain Field Asstt.		6	7	1.12.2001
<u>A.D.A. ORAKZAI AGENCY OFFICE.</u>				
1. Mr. Abdur Raziq Senior Clerk.		11	12	1.12.2001
2. Mr. Kawsar Ali Crop Reporter.		5	6	1.12.2001
3. Mr. Aman Ullah Field Asstt;		10	11	1.12.2001
4. Mr. Fazli Mahood Field Asstt;		10	11	1.12.2001
5. Mr. Alman Ali Field Asstt		9	10	1.12.2001
6. Mr. Ali Issa Budder.		6	7	1.12.2001
7. Mr. Idan Faqir Budder.		6	7	1.12.2001
8. Mr. Habib Ullah Budder.		6	7	1.12.2001
9. Mr. Waris Ali Budder.		6	7	1.12.2001
10. Mr. Waris Khan Budder.		6	7	1.12.2001
11. Mr. Abdul Mateen Driver.		6	7	1.12.2001
<u>E.A.D.A. KHYBER AGENCY OFFICE.</u>				
1. Mr. Anis Ahmad Senior Clerk.		10	11	1.12.2001
2. Mr. Jan Pervez Senior Clerk.		10	11	1.12.2001
3. Mr. Siranjam Khan Junior Clerk		9	10	1.12.2001
4. Mr. Mubark Shah Field Asstt;		10	11	1.12.2001
5. Mr. Mulik Mir Field Asstt;		6	7	1.12.2001
6. Mr. Habib Ullah Field Asstt;		7	8	1.12.2001
7. Mr. Sharafat Khan Field Asstt;		6	7	1.12.2001
8. Mr. Nas Rullah Budder.		7	8	1.12.2001
9. Mr. Imayat Khan Naib Jasiid.		2	3	1.12.2001

Sd/- (ALI AHMAD)
 Dy: Director of Agriculture,
 FATA Peshawar.

No. 1572-1739 /DDA FATA dated Pesh:the 8.12. /2003.

Copy forswarded to:-

1. The Director of Agriculture, FATA Peshawar.
2. The Accountant General PR Sub Office Peshawar.
3. The Agency Account Officer Khyber Agency at Peshawar.
4. The Agency Account Officer Mohamad Agency at Ghallani.
5. The Agency Account Officer Bajour Agency at Khar.
6. The Agency Account Officer Kurram Agency at Parachinar.
7. The Agency Account Officer Orakzai Agency at Hungu.
8. The E.Asstt: Director of Agriculture Khyber Agency Peshawar.
9. The E.Asstt: Director of Agriculture, Mohamad Agency at Ghallani.
10. The E.Asstt: Director of Agriculture, Bajour Agency at Khar.
11. The E.Asstt: Director of Agriculture, Kurram Agency at Parachinar.
12. The Assistant Director of Agriculture, Orakzai Agency at Kalaya.
13. All the Officials Concerned.
14. The Pay Bill Clerk Head Quarter Office.
15. The Estt: Asstt: Head Quarter office.

ATTESTED

For information and necessary action please.

By: *[Signature]*
 Director of Agriculture,
 FATA Peshawar.

C-13

Confidential

4319

No.12/2/Est/ /DG
Dated Peshawar: the 8/4/2010

To:

The Secretary to Govt. of NWFP,
Agriculture, Livestock and Cooperation
Department, Peshawar.

Subject:
Memo:

PROMOTION / POSTING PROPOSAL

In this regard the following Agricultural Inspector BS-9 were cleared for promotion to the post of Agricultural Officer (BS-17) by Departmental Promotion Committee on 16.3.2010 of Agriculture Extension Department.

S.No	Name of Agril. Inspector	S.No	Name of Agril. Inspector
1	S. Mazhar Ali Shah	8	Tehseenullah
2	S. Sartaj Ul Hassan	9	Abdul Sattar
3	Noor Rehman	10	Faizur Rehman
4	Sabit Shah	11	Amanullah
5	Fazli Akbar	12	Fazli Mabood
6	Mian Gul Jan	13	Jaffar Khan
7	Ghazi Gul		

Upon their promotion the transfer / posting proposal is submitted for approval and necessary action.

Sl. No.	Name of officer	From	To	Remarks
1	S. Mazhar Ali Shah	Agril. Inspector o/o DOA, DIKhan.	Agricultural Officer, DIKhan	Against the post of Agril. Officer to be vacated by Mr. Ahmad Nawaz promoted to Sup. Post.
2	S. Sartaj Ul Hassan	Agril. Inspector o/o DOA, Hangu	Agril. Officer, Hangu against the vacant post.	
3	Noor Rehman	Agril. Inspector o/o AAO, S.W.Agency.	Agril. Officer.	On the disposal of FATA for further posting.
4	Sabit Shah	Agril. Inspector o/o AAO, S.W.Agency.	Agril. Officer.	On the disposal of FATA for further posting.
5	Fazli Akbar	Agril. Inspector o/o DCA, Charsadda.	Agril. Officer.	On the disposal of FATA for further posting.
6	Mian Gul Jan	Agril. Inspector o/o AAO, Bajour Agy.	Agril. Officer.	On the disposal of FATA for further posting.
7	Ghazi Gul	Agril. Inspector o/o AAO, Bajour Agy.	Agril. Officer.	On the disposal of FATA for further posting.
8	Tehseenullah	Agril. Inspector o/o AAO, Mohmand Agy.	Agril. Officer.	On the disposal of FATA for further posting.
9	Abdul Sattar	Agril. Inspector o/o AAO, N.W.Agency.	Agril. Officer, Ghazni Khel, Lakki against the vacant post.	
10	Faizur Rehman	Agril. Inspector o/o AAO, N.W.Agency.	Agril. Officer, Daud Shah, Bannu.	
11	Amanullah	Agril. Inspector o/o AAO, Orakzai Agy.	Agril. Officer.	On the disposal of FATA for further posting.

ATTACHED

12.	Fazli Mabood	Agril. Inspector o/o AAO, Orakzai Agy.	Agril: Officer.	On the disposal of FATA for further posting.
13.	Jaffar Khan	Agril. Inspector o/o DOA, Mardan.	Agril: Officer, Kattlang, Mardan against the vacant post.	
14.	Zahoorud Din	Agril: Officer, Khar, Bajour Agency.	Agril: Officer, Bara, Khyber Agency.	Against the post to be vacated by Mr. Zainullah Shah promoted to the Supervisory post.
15.	S. Aqeel Shah	Agril: Officer, Mamond, Bajour Agency.	Agricultural Officer, Dakki o/o DOA, Charsadda: <i>against vacant post</i>	

[Signature]
 DIRECTOR GENERAL
 AGRICULTURE (EXTENSION)
 NWFP, PESHAWAR

14

GOVERNMENT OF KHYBER PAKHTUNKHWA
AGRIL: LIVESTOCK AND COOP: DEPARTMENT:

Dated Peshawar, the 29/6/2010.

NOTIFICATION.

NO. SOE (AD) V-8/2010.- In continuation of this Department's notification of even number dated 22/4/2010, the Competent authority is pleased to order the postings/transfers of the following officers of Agriculture Extension Department in the interest of public service:-

S. No.	Name of Officers	From	To
1.	Mr. Noor Rehman	Agril: Inspector o/o Agency Agril: Officer, SW Agency.	Agril: officer (BS-17) o/o Agency Agril: Officer, SW Agency against vacant post.
2.	Mr. Sabit Shah	Agril: Inspector o/o AAO, SW Agency.	Agril: Officer (BS-17) o/o AAO, Wana SW Agency against vacant post.
3.	Mr. Fazli Akbar	Agril: Inspector o/o DOA, Charsadda.	Agril: Officer (BS-17) o/o AAO, Bajaur Agency Salarzai Circle against vacant post.
4.	Mian Gul Jan	Agril: Inspector o/o AAO, Bajaur Agency.	Agril: Officer (BS-17) o/o AAO Bajaur Agency Mohmand Circle against vacant post.
5.	Mr. Ghazi Gul	Agril: Inspector o/o AAO, Bajaur Agency.	Agril: Officer (BS-17) o/o AAO, Bajaur Agency. Vice No.11
6.	Mr. Tehseenullah	Agril: Inspector o/o AAO, Mohmand Agency.	Agril: Officer (BS-17) o/o AAO, Mohmand Agency Ekka Ghund Circle against vacant post.
7.	Mr. Abdul Sattar	Agril: Inspector o/o AAO, NW Agency.	Agril: Officer (BS-17), Ghazni Khel, Lakki Marwat against vacant post.
8.	Mr. Faiz-ur-Rehman	Agril: Inspector o/o AAO, NW Agency.	Agril: Officer (BS-17), Daud Shah, District Bannu against vacant post.
9.	Mr. Amanullah	Agril: Inspector o/o AAO, Orakzai Agency.	Agril: Officer (BS-17) o/o AAO, Mohmand Agency (Pendiali Circle) against vacant post.
10.	Mr. Fazli Mabood	Agril: Inspector o/o AAO, Orakzai Agency.	Agril: Officer (BS-17) o/o AAO, Mohmand Agency Lakkaro Circle against vacant post.
11.	Mr. Zahoorud Din	Agril: Officer, Khar Bajor Agency.	Agril: Officer, Bara Khyber Agency against vacant post.
12.	S. Aqeel Shah	Agril: Officer o/o AAO, Bajour Agency.	Agril: Officer, Dakki o/o DOA, Charsadda against vacant post.

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
AGRIL: L/STOCK AND COOP: DEPTT:**

Endst. of even No. & Date.

Copy forwarded for information and necessary action to:-

1. The Director General, Agriculture (Extension) Khyber Pakhtunkhwa, Peshawar.
2. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. The Additional Accountant General (PR) Sub-Office, Peshawar.
4. The Director, Agriculture (Extension), FATA, Khyber Pakhtunkhwa, Peshawar.
5. The Section Officer (Estab) FATA Secretariat, Khyber Pakhtunkhwa, Warsak Road, Peshawar.
6. All the Agency Agril: Officers in Khyber Pakhtunkhwa.
7. All the Agency Accounts Officers in Khyber Pakhtunkhwa.
8. The District Accounts Officers, Bannu, Lakki Marwat and Charsadda.
9. Officers concerned.
10. Personal file of the Officers.
11. PS to Minister for Agriculture, Khyber Pakhtunkhwa.
12. PS to Chief Secretary, Khyber Pakhtunkhwa.
13. PS to Secretary Agriculture, Pakhtunkhwa.

(SAKHI-UR-REHMAN)
SECTION OFFICER-ESTT:

Dated Peshawar, the 30/6/2011

NOTIFICATION
NO. SOE (AD)/VI-106/2011.

In pursuance of the Government of Khyber Pakhtunkhwa Finance Department (Regulation Wing) letter No. SO(FR)/FY/13/2010/Vol.II dated 28-6-2011, the competent authority has been pleased to upgrade 1054 posts of Field Assistant (BS-6) and Agriculture Inspectors (BS-9), working in Agriculture (Extension) Research, Water Management and Soil Conservation Department, including FATA, as per details mentioned in the minutes of the meeting vide paras 4-7 reproduced below:-

SETTLED AREA.

S.No.	Department	No. of posts of Fields Assistant.	No. of posts of Agriculture Inspector.
1.	Agriculture Extension	539	47
2.	Agricultural Research	207	4
3.	Soil Conservation	44	8
4.	Water Management	8	51
Total:-		798	

FATA AREA

S.No.	Department	No. of posts of Fields Assistant	No. of posts of Agriculture Inspector.
1.	Agriculture Extension FATA	189	12
2.	Agriculture Research FATA	4	12
TOTAL:-		193	

- i. Basic pay scale of Field Assistant at first entry into government service be upgraded from BS-6 to BS-9;
- ii. 25% of the total posts of Field Assistant may be allowed as Agriculture Inspector BS-11 in each wing of Agriculture Department.
- iii. 33% of total sanctioned posts of Agriculture Inspector be allowed BS-11 to BS-14 as Agriculture Supervisor in each wing of Agriculture Department subject to minimum service of 15 years as Agriculture Inspector or Field Assistant.
- iv. The curriculum of Field Assistant class will be revised and duration of the course will be enhanced from two years to three years (diploma course) for Field Assistant.
- v. 06 months condensed course in the relevant field in the respective wing of the Agriculture Department will be conducted for in service staff and they will clear the examination in two terms otherwise they will be compulsorily retired from service.
- vi. The educational qualification for initial appointment of Field Assistant would be the same i.e. Matric with science on account of enhancement of course duration from two to three years.

Handwritten notes:
CLASSIFIED
19/6
8437-38
Date Peshawar 30/6/11

Copy to:
1. The BDA, Peshawar
2. The BDA, D.I.
Encl. information
APR 15/11

SECRETARY TO GOVERNMENT OF
KHYBER PAKHTUNKHWA
AGRI: L/STOCK & COOP: DEPTT:

ATTESTED

803

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Copy forwarded for information and necessary action to:

- 1. The Accountant General, Khyber Pakhtunkhwa, Peshawar
- 2. The Additional Accountant General (PR) Sub-Office, Khyber Peshawar
- 3. All District / Agency Accounts Officers, in Khyber Pakhtunkhwa.

[Signature]
 (SHAUKAT ULLAH)
 SECTION OFFICER (FR)
 FINANCE DEPARTMENT

Endst. No. 50(AD)VI-106/2011

Dated Peshawar, the 30/6/2011.

Copy forwarded for information and necessary action to:

- 1. The Director General, Agriculture (Extension), Khyber Pakhtunkhwa, Peshawar
- 2. The Director General, Agricultural Research, Khyber Pakhtunkhwa, Peshawar
- 3. The Director General, On-Farm Water Management, Khyber Pakhtunkhwa, Peshawar
- 4. The Director General, Agriculture (Extension), FATA, Khyber Pakhtunkhwa, Peshawar
- 5. The Director (FATA) Agricultural Research Institute, Tarnab, Peshawar
- 6. The Director, Soil Conservation, Khyber Pakhtunkhwa, Peshawar
- 7. The Section Officer-Establ. FATA Secretariat, Peshawar
- 8. The Section Officer (FR) Finance Department w.r to his letter number quoted above
- 9. The Budget Officer-VII, Finance Department.
- 10. All Section Officers in the Agriculture Department.
- 11. The Manager Government Printing Press, Peshawar
- 12. The Director of Information, Khyber Pakhtunkhwa, Peshawar
- 13. P.O. to Minister for Agriculture, Khyber Pakhtunkhwa, Peshawar
- 14. P.O. to Secretary Agriculture.

[Signature]
 (MUHAMMAD ZAHID)
 SECTION OFFICER-ESTT

DIRECTORATE GENERAL AGRICULTURE (EXTENSION) KHYBER PAKHTUNKHWA
PESHAWAR.

18412-504

Endst. No. 18/159-AV/Estt/ /DG

Dated Peshawar, the 5/10 2011.

Copy to:

- 1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2. The Additional Accountant General (PR) Sub-Office, Peshawar.
- 3. The Director Agriculture (Extension) FATA, Khyber Pakhtunkhwa, Peshawar.
- 4. The Principal Agricultural Training Institute, Peshawar.
- 5. All Executive District Officers Agriculture in Khyber Pakhtunkhwa.
- 6. All District Directors Agriculture in Khyber Pakhtunkhwa.
- 7. All District / Agency Accounts Officers in Khyber Pakhtunkhwa.
- 8. All Agriculture Agency Officers in KPK.
- 9. For information and necessary action.
- 9. File No. 18/1/Estt for record.

[Signature]
 SUPERINTENDENT (ESTT)
 To DIRECTOR GENERAL
 AGRICULTURE (EXTENSION)
 KHYBER PAKHTUNKHWA, PESHAWAR

[Signature]
 Mr. Mansoor all conc of F.A.O.
 Mr. G. Ladage

[Signature]
 Submit all S. Books.
 of Field Assst.
[Signature]

[Signature]
 06/09/12

ATTESTED

[Signature]

To

The Additional Chief Secretary FATA,
FATA Secretariat, KPK Peshawar.

SUBJECT: DEPARTMENTAL APPEAL FOR THE GRANT OF PROMOTION FROM FIELD ASSISTANT TO AGRICULTURE INSPECTOR ON REGULAR BASIS AND AGAINST THE NOTIFICATION DATED 30.6.2011 WHEREBY THE PROMOTION AND UPGRADATION OF THE APPELLANT HAS BEEN SUCCUMBED

R.SHEWETH:

- 1- That appellant has joined the agriculture Department as Field Assistant (BPS-06) vide order dated 7.8.1982. That right from appointment till date appellant performing his duty quite efficiently and up to the entire satisfaction of his superiors.
- 2- That appellant has served the Department for more than 30 years as Field assistant. That despite of having experience and seniority the appellant has not been promoted to the post of Agriculture Inspector (BPS-11) till date though many other junior colleagues of the appellant has now been working as Agriculture Officers (BPS-17) but the appellant having more than 30 years service and being senior most employee and eligible for promotion has not been promoted till date to the post of Agriculture Inspector (BPS-11).
- 3- That despite of that the respondent Department has issued Notification dated 30.6.2011 due to which the chances of promotion to the post of Agriculture Inspector (BPS-11) has been attached with the condition that " 33% of total sanctioned posts of Agriculture inspector be allowed BPS-11 to BPS-14 as Agriculture supervisor in each wing of Agriculture Department subject to minimum service of 15 years service as Agriculture Inspector or Field Assistant iv- the curriculum of Field Assistant class will be revised and duration of the course will be enhanced from two years to three years (diploma course) for field Assistant and v- six months condensed course in the relevant field in the respective wing of the agriculture Department will be conducted for in-service staff and they will clear the examination in two terms otherwise they will be compulsory retired from service".

ATTESTED
13

- 4- That all the above mentioned conditions of the said Notification are against the existing service structure of the agriculture Department. Further more due to above mentioned conditions the chances of promotion of field Assistant will certainly be stopped.
- 5- That feeling aggrieved appellant prefer this Departmental appeal on the following grounds amongst the others.

GROUND:

- A- That the impugned Notification dated 30.6.2011 is against the law, facts, natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That not granting/allowing promotion to the appellant to the post of Agriculture Inspector (BPS-11) from Field Assistant is against the law, facts and norms of natural justice.
- C- That appellant has not been treated by the authorities in accordance with law and rules on the subject noted above and as such the respondent Department violated Article 4 and 25 of the Constitution of Pakistan 1973.
- D- That despite of having more than 30 years service and having eligibility for promotion to the post of Agriculture Inspector the appellant has been ignored from promotion/up gradation to higher scale.
- E- That the Agriculture Department has acted in arbitrary and malafide manner by not promoting the appellant to the post of Agriculture Inspector (BPS-11).
- F- That many of the appellant junior colleagues have now been working as Agriculture Officers BPS-17 and the appellant is still working as Field Assistant (BPS-9) thus the appellant has been discriminated and not been treated amongst his similarly placed colleagues.

It is therefore humbly prayed that on acceptance of this Departmental appeal the impugned Notification dated 30.6.2011 may very kindly be set aside and the appellant may very kindly be promoted to the post Agriculture Inspector (BPS-11). Any other remedy which your good self deems fit that may also be awarded in favor of the appellant.

DATED:8.2.2013

ATTESTED

APPELLANT

 SIRAJ UL HAQ FIELD ASSISTANT,
 O/O THE AGENCY ADGRICULTURE OFFICER,
 BAJAUR AGENCY.

BEFORE THE KHYBER PAKHTUNKHEWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO _____/2013

Siraj-ul-Haq

VS

A.C.S FATA

APPLICATION FOR SUSPENTION OF OPERATION
OF IMPUGNED NOTIFICATION DATED 30-6-2011
TILL THE DISPOSAL OF THIS APPEAL

R/SHEWETH:

- 1- That the appellant filed above mentioned appeal along with this application is pending adjudication before this august service Tribunal in which 10.2.2014 date is fixed for hearing.
- 2- That all the three ingredients necessary for the stay is in favor of the appellant.
- 3- That the impugned Notification dated 30.6.2011 is against the appointment, promotion and transfer rules 1989.
- 4- That the grounds of main appeal is also be considered as integral part of this application.

It is therefore humbly prayed that on acceptance of this application the order dated 30-6-2011 may very kindly be suspended till disposal of this appeal.

APPELLANT

THROUGH:

[Signature]
NOOR MOHAMMAD KHATTAK
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No.1016/2013

Mr. Siraj-ul-Haq, Field Assistants (BPS-09), Appellant
o/o the Agency Agriculture Officer Bajour Agency at Khar.

VERSUS

1. The Additional Chief Secretary FATA, FATA Secretariat Warsak Road Peshawar.
2. The Director Agriculture Department FATA, (Extension) Peshawar.
3. The Agriculture Agency Officer, Bajour at Khar.

Para wise comments on behalf of respondents.

RESPECTFULLY SHEWETH,

PRELIMINARY OBJECTIONS

1. The appellant has got no cause of action.
2. The appeal is time barred.
3. The appeal is not maintainable in its present form
4. That the instant appeal is bad for mis-jonder and non jonder of necessary parties.
5. That the appellant has got no locus standi.

FACTS

Para No.1 Pertain to Record.

Para No.2 The Field Assistants are promoted to the post of Agriculture Inspector and from Agriculture Inspector to the post of Agriculture Supervisor and then from Agriculture Supervisor to the post of Agriculture Officer according to Seniority cum-fitness and service rules. All the promotion cases are dealt by the Director General, Agriculture (Extension) Khyber Pakhtunkhwa Peshawar, being head of the department. Therefore this office has no concern with the promotion etc.

Para No.3 The Notification No.SOE(AD)VI-106/2011 dated 30.06.2011 issued by the Secretary to Govt. Khyber Pakhtunkhwa Agriculture Livestock and Coop. Department Peshawar in pursuance of the Govt. of Khyber Pakhtunkhwa Finance Department (Regulation Wing) letter No.SO(FR)/FD /13/2010 Vol-II dated 28.06.2011 for all employees of Agriculture Extension Department which is according to law, rules and policy on the subject.

Para No.4 As explained in Para No.2.

Para No.5 Incorrect. The appeal was rejected by the Director General, Agriculture Extension Khyber Pakhtunkhwa, Peshawar vide his letter No.18/159-A/Estt. / 2396-97 / DG dated 01.2.2015 (Copy attached).

FROM :

FAX NO. :

Feb. 23 2014 08:19AM P1

7

5/3

No.18/159-A/Estt/ 2396-97 /DG
Dated Peshawar: the 01/2 /2015

Mr. Sher Muhammad,
Field Assistant office of the AAO, Bajour Agency.
Mr. Khaista Rehman,
Field Assistant office of the AAO, Bajour Agency.

Subject: APPEAL

Re: MO:

Reference your appeal dated 7.1.2015.

The names of the Agricultural Inspector shown in your application were noted at that time when the seniority of Field Assistant used to maintain on Divisional Level. Therefore, your appeals are hereby rejected.

9/25/2015
DIRECTOR GENERAL
AGRICULTURE (EXTENSION)
KHYBER PAKHTUNKHWA
PESHAWAR *1/6/2015*

cbt No. 2398

Copy to the Agriculture Agency Officer, Bajour Agency at Khar for information.

9/25/2015
DIRECTOR GENERAL
1/6/2015

10

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL No.1016/2013

SIRAJ-UL-HAQ

VS

ACS FATA & OTHERS

REJOINDER ON BEHALF OF APPELLANT IN RESPONSE
TO THE REPLY SUBMITTED BY THE RESPONDENTS

R/SHEWETH:

All the preliminary objections raised by the respondents are incorrect, baseless and not in accordance with law and rules rather the respondents are estopped due to their own conduct to raise any objection at this stage of the appeal.

ON FACTS:

(1 to 6)

- 1- Admitted correct hence need no comments.
- 2- Incorrect and not replied accordingly. That the appellant has been appointed as Field Assistant (BPS-6). That later on the appellant was allowed move-over to BPS-11 vide order dated 08.10.2003. That appellant served in the respondent Department as Field Assistant for more than 28 years quite efficiently and upto the entire satisfaction of his superiors. That colleagues and junior colleagues of the appellant have been promoted to the post of Agriculture Inspector but inspite of seniority and having experience in the relevant field the appellant has been ignored from the said promotion.
- 3- Incorrect and not replied accordingly. That vide respondent Department Notification dated 30-06-2011 the chances of promotion to the post of Agriculture Inspector (BPS-11) has been attached with the condition that "33% of total

sanctioned posts of Agriculture Inspector be allowed BPS-11 to BPS-14 as Agriculture Supervisor in each wing of Agriculture Department subject to minimum service of 15 years as Agriculture Inspector or Field Assistant. That the curriculum of field Assistant class enhanced from 2 years to 3 years (Diploma Course) and six months condensed course for in service staff which must be cleared in two chances otherwise they will be compulsory retired from service". That appellant served in the respondent Department for more

than 28 years and also passed the said six month condensed course. That in light of the said seniority appellant is entitle for promotion to the post of Agriculture Inspector from the date of when colleagues and junior colleagues of the appellant have been promoted to the post of Agriculture Inspector.

- 4- Incorrect and not replied accordingly hence denied.
- 5- Incorrect and not replied accordingly. That the rejection order of the Departmental appeal of the appellant has not been communicated to appellant till date.

GROUND:
(A to H):

All the grounds of main writ petition of the petitioner are correct and in accordance with law and prevailing rules and that of the respondents are incorrect and baseless. That the impugned orders dated 30-06-2011 issued by the respondents is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside. That the impugned Notification dated 30-06-2011 has been null and void and having no force of law in light of new Notification dated 20-04-12, therefore the same may be set aside. That respondent Department has acted in arbitrary and malafide manner by not promoting the appellant to the post of Agriculture Inspector BPS-11 inspite of seniority and eligibility.

It is therefore most humbly prayed that on acceptance of this rejoinder the appeal of the appellant may be accepted in favor of the appellant.

APPELLANT


SIRAJ-UL-HAQ

THROUGH:

NOOR MOHAMMAD KHATTAK
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL No.1016/2013

SIRAJ-UL-HAQ

VS

ACS FATA & OTHERS

REJOINDER ON BEHALF OF APPELLANT IN RESPONSE
TO THE REPLY SUBMITTED BY THE RESPONDENTS

R/SHEWETH:

All the preliminary objections raised by the respondents are incorrect, baseless and not in accordance with law and rules rather the respondents are estopped due to their own conduct to raise any objection at this stage of the appeal.

ON FACTS:

(1 to 6)

- 1- Admitted correct hence need no comments.
- 2- Incorrect and not replied accordingly. That the appellant has been appointed as Field Assistant (BPS-6). That later on the appellant was allowed move-over to BPS-11 vide order dated 08.10.2003. That appellant served in the respondent Department as Field Assistant for more than 28 years quite efficiently and upto the entire satisfaction of his superiors. That colleagues and junior colleagues of the appellant have been promoted to the post of Agriculture Inspector but inspite of seniority and having experience in the relevant field the appellant has been ignored from the said promotion.
- 3- Incorrect and not replied accordingly. That vide respondent Department Notification dated 30-06-2011 the chances of promotion to the post of Agriculture Inspector (BPS-11) has been attached with the condition that "33% of total

sanctioned posts of Agriculture Inspector be allowed BPS-11 to BPS-14 as Agriculture Supervisor in each wing of Agriculture Department subject to minimum service of 15 years as Agriculture Inspector or Field Assistant. That the curriculum of field Assistant class enhanced from 2 years to 3 years (Diploma Course) and six months condensed course for in service staff which must be cleared in two chances otherwise they will be compulsory retired from service". That appellant served in the respondent Department for more

than 28 years and also passed the said six month condensed course. That in light of the said seniority appellant is entitle for promotion to the post of Agriculture Inspector from the date of when colleagues and junior colleagues of the appellant have been promoted to the post of Agriculture Inspector.

- 4- Incorrect and not replied accordingly hence denied.
- 5- Incorrect and not replied accordingly. That the rejection order of the Departmental appeal of the appellant has not been communicated to appellant till date.

GROUND:
(A to H):

All the grounds of main writ petition of the petitioner are correct and in accordance with law and prevailing rules and that of the respondents are incorrect and baseless. That the impugned orders dated 30-06-2011 issued by the respondents is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside. That the impugned Notification dated 30-06-2011 has been null and void and having no force of law in light of new Notification dated 20-04-12, therefore the same may be set aside. That respondent Department has acted in arbitrary and malafide manner by not promoting the appellant to the post of Agriculture Inspector BPS-11 inspite of seniority and eligibility.

It is therefore most humbly prayed that on acceptance of this rejoinder the appeal of the appellant may be accepted in favor of the appellant.

APPELLANT


SIRAJ-UL-HAQ

THROUGH:

NOOR MOHAMMAD KHATTAK
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL No.1016/2013

SIRAJ-UL-HAQ

VS

ACS FATA & OTHERS

REJOINDER ON BEHALF OF APPELLANT IN RESPONSE
TO THE REPLY SUBMITTED BY THE RESPONDENTS

R/SHEWETH:

All the preliminary objections raised by the respondents are incorrect, baseless and not in accordance with law and rules rather the respondents are estopped due to their own conduct to raise any objection at this stage of the appeal.

ON FACTS:

(1 to 6)

- 1- Admitted correct hence need no comments.
- 2- Incorrect and not replied accordingly. That the appellant has been appointed as Field Assistant (BPS-6). That later on the appellant was allowed move-over to BPS-11 vide order dated 08.10.2003. That appellant served in the respondent Department as Field Assistant for more than 28 years quite efficiently and upto the entire satisfaction of his superiors. That colleagues and junior colleagues of the appellant have been promoted to the post of Agriculture Inspector but inspite of seniority and having experience in the relevant field the appellant has been ignored from the said promotion.
- 3- Incorrect and not replied accordingly. That vide respondent Department Notification dated 30-06-2011 the chances of promotion to the post of Agriculture Inspector (BPS-11) has been attached with the condition that "33% of total

sanctioned posts of Agriculture Inspector be allowed BPS-11 to BPS-14 as Agriculture Supervisor in each wing of Agriculture Department subject to minimum service of 15 years as Agriculture Inspector or Field Assistant. That the curriculum of field Assistant class enhanced from 2 years to 3 years (Diploma Course) and six months condensed course for in service staff which must be cleared in two chances otherwise they will be compulsory retired from service". That appellant served in the respondent Department for more

than 28 years and also passed the said six month condensed course. That in light of the said seniority appellant is entitle for promotion to the post of Agriculture Inspector from the date of when colleagues and junior colleagues of the appellant have been promoted to the post of Agriculture Inspector.

- 4- Incorrect and not replied accordingly hence denied.
- 5- Incorrect and not replied accordingly. That the rejection order of the Departmental appeal of the appellant has not been communicated to appellant till date.

GROUND:
(A to H):

All the grounds of main writ petition of the petitioner are correct and in accordance with law and prevailing rules and that of the respondents are incorrect and baseless. That the impugned orders dated 30-06-2011 issued by the respondents is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside. That the impugned Notification dated 30-06-2011 has been null and void and having no force of law in light of new Notification dated 20-04-12, therefore the same may be set aside. That respondent Department has acted in arbitrary and malafide manner by not promoting the appellant to the post of Agriculture Inspector BPS-11 inspite of seniority and eligibility.

It is therefore most humbly prayed that on acceptance of this rejoinder the appeal of the appellant may be accepted in favor of the appellant.

APPELLANT


SIRAJ-UL-HAQ

THROUGH:

NOOR MOHAMMAD KHATTAK
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO 1016 /2013

Mr. Siraj Ul Haq, Field Assistant (BPS-09),
O/O the Agency Agriculture Officer Bajaur at Khar

M. W. F. Peshawar
10/29
07-6-13

..... APPELLANT

VERSUS

- 1- The Additional Chief Secretary FATA, FATA Secretariat Warsak Road, Khyber Pakhtunkhwa Peshawar.
- 2- The Director Agriculture Department FATA, FATA Secretariat Warsak Road, Khyber Pakhtunkhwa Peshawar.
- 3- The Agency Agriculture Officer, Bajaur at Khar.
- 4- Mr. Mazhar Ali Shah, Agriculture Officer, C/O Directorate of Agriculture Department.
- 5- Mr. Hidayatullah, Agriculture Officer, C/O Directorate of Agriculture Department.
- 6- Mr. Sher Afzal, Agriculture Officer, C/O Directorate of Agriculture Department.

..... RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 FOR DIRECTING THE RESPONDENTS TO REGULARLY PROMOTE THE APPELLANT TO THE POST OF AGRICULTURE INSPECTOR FROM THE DATE WHEN APPELLANT COLLEAGUES AND JUNIOR COLLEAGUES WERE PROMOTED AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN STATUTORY PERIOD OF NINETY DAYS

PRAYER:

That on acceptance of this appeal the respondents may very kindly be directed to set aside the impugned Notification dated 30.6.2011 being illegal and the respondents may further please be directed to regularly promote the appellant on the post of Agriculture Inspector from the date when appellant colleagues/junior colleagues were promoted. Any other remedy which this august Service Tribunal deems fit that may also be awarded in favour of the appellant.

R/SHEWETH:

- 1- That appellant has joined respondent Department as field Assistant (BPS-6) vide order dated 7.8.1982. That right from appointment till date appellant performing his duty quite efficiently and up to the entire satisfaction of his superiors. Copy of the service book is attached as annexure A.

- 2- That appellant was allowed move-over to BPS-11 vide order dated 8.10.2003. That appellant has served the respondent Department for more than 28 years as Field Assistant. That despite of having experience and seniority the appellant has not been promoted to the post of Agriculture Inspector till date though many other colleagues and junior colleagues of the appellant have been promoted by the respondent Department and has now been working as Agriculture Officers (BPS-17) but the appellant having more than 28 years service and being senior most employee and eligible for promotion has not been promoted till date to the post of Agriculture Inspector. Copies of the orders and seniority lists are attached as annexure **B, C, D & E.**

- 3- That so much so the respondent Department has issued Notification dated 30.6.2011 due to which the chances of promotion to the post of Agriculture Inspector (BPS-11) has been attached with the condition that " 33% of total sanctioned posts of Agriculture Inspector be allowed BPS-11 to BPS- 14 as Agriculture supervisor in each wing of Agriculture Department subject to minimum service of 15 years service as Agriculture Inspector or field Assistant class will be revised and duration of the course will be enhanced from two years to three years (diploma course) for field Assistant and v- six months condensed course in the relevant field in the respective wing of the Agriculture Department will be conducted for in-service staff and they will clear the examination in two terms otherwise they will be compulsory retired from service". Copy of the Notification is attached as annexure **F.**

- 4- That all the above mentioned conditions of the said Notification are against the service structure of the Agriculture Department. Moreover due to above mentioned condition the chances of promotion of appellant would certainly be stopped.

- 5- That feeling aggrieved appellant prefer Departmental appeal to respondent Department but no reply has been received within the statutory period of ninety days. Hence the present appeal on the following grounds amongst the others. Copy of the Departmental appeal is attached as annexure **G..**

GROUND:

- A- That the impugned Notification dated 30.6.2011 is against the law, facts, natural justice and material on the record hence not tenable and liable to be set aside.

- B- That not granting/ allowing promotion to the appellant to the post of Agriculture Inspector (BPS-11) from the post of field Assistant is against the law, facts and norms of natural justice.
- C- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondent Department violated article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- D- That despite of having more than 28 years service and having eligibility for promotion to the post of Agriculture Inspector the appellant has been ignored from promotion to higher scale.
- E- That the respondent Department has acted in arbitrary and malifide manner by not promoting the appellant to the post of Agriculture Inspector (BPS-11) inspite of seniority and eligibility.
- F- That many of the appellant colleagues and junior colleagues have now been working as Agriculture Officers BPS-17 and the appellant is still working as Field Assistant (BPS-9) thus the appellant has been discriminated and not been treated amongst his similarly placed colleagues.
- G- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, humbly prayed that on that the appeal of the appellant may very kindly be accepted as prayed for.


APPELLANT

SIRAJ UL HAQ
THROUGH: 
NOOR MOHAMMAD KHATTAK
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1016 /2013

SIRAJ UL HAQ

VS

A.C.S FATA

APPLICATION FOR CONDONATION OF
DELAY IN FILING THE ABOVE NOTED
APPEAL

R.SHEWETH:

- 1- That the appellant has filed an appeal along with this application in which no date has been fixed so far.
- 2- That the appellant prays for the condonation of delay in filing the above noted appeal inter alia on the following grounds:

GROUND OF APPLICATION:

- A- That valuable rights of the appellant are involved in the case hence the appeal deserve to decide on merit.
- B- That it has been the consistent view of the Superior Courts that causes should be decided on merit rather on technicalities including the limitation. The same is reported in 2004 PLC (CS) 10142003 PLC (CS) 76.

It is therefore prayed that on acceptance of this application the delay in filing the above noted appeal may please be condoned.


APPELLANT

SIRAJ UL HAQ
THROUGH:

NOOR MOHAMMAD KHATTAK
ADVOCATE

1. Name Siraj ul Haq (نام)

2. Nationality and Religion Islamic (قومیت اور مذہب)

3. Residence Teh. Akhla. v. ill. Mukher P. o. Munda (مستقل رہائش)

4. Father's name and residence Mohd. Masum (والد کا نام اور پتہ)

5. Date of birth by Christian era as nearly as can be ascertained 10-2-1963 (تاریخ پیدائش مطابق سن عیسوی)

6. Exact height by measurement 5-6 (قد و قامت)

7. Personal mark for identification A. Scar on left leg. (نشان شناخت)

8. Left hand/right hand thumb and finger-impressions of (None-gazetted) officer. (سود کی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger (چھتنگیا) Ring Finger (چھتنگیا کے ساتھ کی انگلی) Middle Finger (میان)

Fore Finger (انگشت شہادت) Thum (انگوٹھا)

9. Signature of Government servant (سرکاری ملازم کے دستخط)

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

(تصدیق کنندہ افسر کے دستخط اور مہر)

[Handwritten signature and official stamp]

ATTESTED

[Handwritten initials]

Note :-The entries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after every 5 years under this rule. اس صفحہ کے مندرجات کم از کم ہالچ سال بعد تصدیق ہونا ضروری ہیں اور نمبر 9 - 10 میں دستخطوں کے لیے تاریخ ہونی چاہئے۔ انگلیوں کے نشانات کیلئے ہر ہالچ سال کے بعد تصدیق کی ضرورت نہیں۔

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating, and whether permanent or temporary	If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government servant
F. Assistant درجہ ملازمت	عاری مستقل یا تائم مقام	اگر عاری ہے تو یہ وہ رول کے مطابق پیشن کا مستحق ہے	تعمرواہ بلوچ عاری ملازمت	زائد تعمرواہ نادر تعمرواہ بلوچ تائم مقام	ماسوائے تعمرواہ دیگر الادویس	تائید تقرری	دستخط سرکاری ملازم
			RS. P.	RS. P.			
290-10-350/2-470-14-540 F. Assst.	officiating temp. 1983			290/-		7-8-82 (F. No. 1000)	
6-540-20-900 F. Assst.	do			540/-		1-7-83	
do	11			560/-		1-12-83	
do	do			580/-		1-12-84	

Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8

دستخط افسر
مجاز

12

12

12

B. A. D. A.
Bajaur Agency
Khar.

Signature of government servant

9	10	11	12	13	14	15
Signature and Designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the Head of the office of other Attesting Officer	<p>چھٹی LEAVE</p> <p>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</p> <p>چار ماہ تک کی رخصت کیلئے اوسط متحوراہ کا نہیں</p>	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
دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجوہات انقطاع عطا نیت ترقی، تبادلہ یا برطرفی	دستخط افسر مجاز	<p>طبیعت کی نوعیت و معیار</p> <p>Period: عرصہ</p> <p>Govt. to which debitable: گورنمنٹ برائے رجم انا بولی</p>	دستخط افسر مجاز	سزا یا جزا یا تادیب یا کارکردگی کا ریکارڈ
[Signature]	[Signature]	[Signature]	[Signature]	<p>Service verified from the official copy of the Pay Bill of the concerned with effect from 7.4.82 to 30.11.82</p>	[Signature]	The Pay Bill of the official concerned with effect from 7.4.82 to 30.11.82
[Signature]	[Signature]	[Signature]	[Signature]	<p>Pay fixed @ Rs. 540 p. month with effect from 1.7.83 vide Govt. of N.W.F.P. Finance Dept. No. FD (SR-1) 1-03/82 dated 24.4.1983</p>	[Signature]	Pay fixed @ Rs. 540 p. month with effect from 1.7.83 vide Govt. of N.W.F.P. Finance Dept. No. FD (SR-1) 1-03/82 dated 24.4.1983
[Signature]	[Signature]	[Signature]	[Signature]	<p>Service verified from the office copy of the Pay Bill of the official concerned with effect from 1.12.82 to 30.11.82</p>	[Signature]	Service verified from the office copy of the Pay Bill of the official concerned with effect from 1.12.82 to 30.11.82
[Signature]	[Signature]	[Signature]	[Signature]	<p>Service verified from the office copy of the Pay Bill of the official concerned with effect from 1.12.83 to 30.11.84</p>	[Signature]	Service verified from the office copy of the Pay Bill of the official concerned with effect from 1.12.83 to 30.11.84
[Signature]	[Signature]	[Signature]	[Signature]	<p>Service verified from the office copy of the Pay Bill of the official concerned with effect from 1.12.84 to 30.11.85</p>	[Signature]	Service verified from the office copy of the Pay Bill of the official concerned with effect from 1.12.84 to 30.11.85
[Signature]	[Signature]	[Signature]	[Signature]	<p>Service verified from the office copy of the Pay Bill of the official concerned with effect from 1.12.85 to 30.11.86</p>	[Signature]	Service verified from the office copy of the Pay Bill of the official concerned with effect from 1.12.85 to 30.11.86
[Signature]	[Signature]	[Signature]	[Signature]	<p>Service verified from the office copy of the Pay Bill of the official concerned with effect from 1.12.86 to 30.11.87</p>	[Signature]	Service verified from the office copy of the Pay Bill of the official concerned with effect from 1.12.86 to 30.11.87

B. A. D. A. Bajaur Agency at Khar. At

30-11-84 Annual Increment

Pay fixation in N. P. S. 1983 Pay fixed in Basic Pay Scale No. 17 540 - 26 - 74 with effect from 1.7.1983 with date of next increment on 1.12.1983

ASSISTANT ACCOUNTS OFFICER ACCOUNT GENERAL P.W.D. S.W. OFFICE, PUNJAWAR.

ATTESTED

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating, and whether permanent or temporary	If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government servant
درجہ ملازمت F. Assn:	عارضی مستقل یا قائم مقام 1985	اگر عارضی ہے تو کیا وہ رول کے مطابق پیش کش کا مستحق ہے	تنخواہ بلوچ عارضی ملازمت	زائد تنخواہ بلوچ قائم مقام	باسوائے تنخواہ دیگر الاؤنس	تاریخ تقرری	دستخط سرکاری ملازم
3.6-540-20-940 F. Assn:	Official Engg Temp.		RS. P.	RS. P. 600/-		1-12-85	
do				620/-		1-12-86	
Grade-725-28-285 F. Assn:	do			837/-		1-7-87	
do	do			865/-		1-12-87	

Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8

دستخط افسر
مجاز

Bajour Agency
Khas

A. D.
Bajour Agency
Khas

Handwritten signature

Handwritten signature

Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the Head of the office of 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
				Nature and duration of leave taken	Govt. to which debitable		
				رقعت کی نوعیت و معیار	Period عرصہ		
<p>دستخط افسر نجاز</p>	<p>تاریخ انقطاع ملازمت</p>	<p>وجوبات انقطاع ملازمت ترقی، تبادلہ یا برطرفی</p>	<p>دستخط افسر نجاز</p>	<p>چار ماہ تک کار خیریت کیسے اوسط تنخواہ کا تعین</p>	<p>Service verified from the office copy of pay bill from 1-12-87 to 30-11-88</p>	<p>دستخط افسر نجاز</p>	<p>سزا یا جزا یا فوجی یا کارکردگی کا ریکارڈ</p>
<p>Extra Assit: Director of Agrl Bajaur Agency at Khar</p>	<p>Annual pro on 30-11-88</p>		<p>دستخط افسر نجاز</p>		<p>Service verified from the office copy of the pay bill w.e.b. from 1-12-88 to 30-11-89</p>	<p>Extra Assit: Director of Agrl Bajaur Agency at Khar</p>	
<p>Extra Assit: Director of Agrl Bajaur Agency at Khar</p>	<p>30-11-89</p>		<p>دستخط افسر نجاز</p>		<p>Service verified from the office copy of the pay bill w.e.b. from 1-12-89 to 30-11-89</p>	<p>Extra Assit: Director of Agrl Bajaur Agency at Khar</p>	
<p>Extra Assit: Director of Agrl Bajaur Agency at Khar</p>	<p>30-11-90</p>		<p>دستخط افسر نجاز</p>		<p>Service verified from the office copy of the pay bill w.e.b. from 1-12-89 to 30-11-90</p>	<p>Extra Assit: Director of Agrl Bajaur Agency at Khar</p>	

ATTESTED

17/9

T. 6072/311
87/91
of awarded Selection grade inf. 2-12-90
to 30-6-91 drawn of Rs. 1111-77+
6932804/77

LA to Bajaur
11/17

Good selection grade in BPS-9 (830-38-1590), w.e.f. from 2.12-90 with order for selection grade in BPS-9 Enclosed by DAC/FATA NWFP, Peshawar with his Order No 2/18-ESL: 11070/116/DAC/FATA dated 24.12-90.

P.F.O

دستخط افسر نجاز

Whether substantive or officiating, and whether permanent or temporary.	If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 320 of C.S.R. (Pb.) volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government servant
		RS. P.	RS. P.			
درجہ ملازمت عادی مستقل یا قائم مقام	اگر عادی ہے تو کہنا وہ رول کے مطابق پیشن کا مستحق ہے	تنخواہ بطور عادی ملازمت	زائد تنخواہ بطور قائم مقام	ماسوائے تنخواہ دیگر الائوس	تاریخ تقرری	دستخط سرکاری ملازم
B-9-11-85-72-2265 Asst. Secy. (H.A.) P.A.	Official Secy P.A.		1545/-	-	12/6/91	
do	do		1617/-		12/9/91	
do			1689/-		12/9/92	

Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to-8
دستخط افسر
مجاز

Extra Secy
Bahar

Signature

Extra Secy
Bahar

9	10	11	12	13		14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 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	<p>LEAVE</p> <p>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</p> <p>Nature and duration of leave taken</p> <p>Govt. to which debitable</p>		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
				Period			
<p>دستخط افسر ملازم</p> <p>دستخط افسر ملازم</p>	<p>تاریخ انقطاع ملازمت</p>	<p>وجوہات انقطاع ملازمت ترقی یا تبادلہ یا برطرفی</p>	<p>دستخط افسر ملازم</p>	<p>نقصت کی نوعیت و معیار</p>	<p>چار ماہ تک کی رخصت کیلئے اوسط تنخواہ کا تعین</p> <p>Govt. to which debitable گورنمنٹ جسے رہن ادا ہوگی</p> <p>Period عرصہ</p>	<p>دستخط افسر ملازم</p>	<p>سزا یا جزیل یا غیر مناسبت کارکردگی کا ریکارڈ</p>
					<p>Allowed money with DDA / K.A. TA No 1672-1739 dt 8-10-2003 at Rs. 12 pay fixed Rs. 4875/- on 11/12/2001.</p> <p>T-266 9/12 Pw Rs 511 Honable more over w/d 11/12/2001 T.B. 10.</p> <p>ATTESTED 30/11/2003</p> <p>Service was fixed from the pay bill w/d 1-12-2002 to 30-11-2003</p> <p>Director of App Bajaur Agency at Dera</p> <p>Director of App Bajaur Agency at Dera</p>		

Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8

دستخط افسر مجاز

1	2	3	4	5	6	7	8
Name of post درجہ ملازمت	Whether substantive or officiating and whether permanent or temporary عارضی مستقل قائم مقام	If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume II اگر عارضی ہے تو کہہ دو وہ رول کے مطابق پیش کیا مستحق ہے	Pay in substantive post تنخواہ بطور عارضی ملازمت	Additional pay for officiating زائد تنخواہ بطور قائم مقام	Other emoluments falling under the term "pay" ماسوائے تنخواہ دیگر ایڈوانس	Date of appointment تاریخ تقرری	Signature of Government servant دستخط سرکاری ملازم
BPS-9-2410-145-6760/			RS. P.	RS. P.			
Q. Sorajul Haq F.A.				5310/		11/12/04	
BPS-9-2770-165-7720/							
Sorajul Haq F.A.				8070/		1/7/05	
do				6235/		1-12-05	
do				6400/		1-12-2006	

The entries in this page should be renewed or re-attested at least every five years and the signature to Forms 9 and 10 should be dated.

Name: Sirajul Haq. P/ASST.

Race: _____

Residence: Mataba. Bejan.

Father's name and residence: Abdul Manan.

Date of birth by Christian era as nearly as can be ascertained: _____

Exact height by measurement: _____

Personal marks for identification: _____

Left hand thumb and finger impression of (Non-Gazetted) officer:

Little Finger

Ring Finger

Middle Finger

Fore Finger

Thumb

Signature of Government Servant: _____

ATTESTED

Signature and designation of the Head of the Office, or other Attesting Officer: _____

1	2	3	4	5	6	7	8	9
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the terms	Date of appointment	Signature of Government Servant	Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8
BPS-9-3820-230-10720 Sirajul Haq.		PLASST			9570/-	1 ¹² / ₂₀₀₉		
BPS-9-3820-230-10720 Sirajul Haq.		PLASST			9800/-	1 ¹² / ₂₀₁₀		Agriculture Ag Bajar Ag
BPS-9-6200-380-17600/- Sirajul Haq.		PLASST			16080/-	1 ⁷ / ₂₀₁₁		Agricult Baja
BPS-9-6200-380-17600/- Sirajul Haq.		PLASST			16480/-	1 ¹² / ₂₀₁₁		

