

16.02.2022


Due to retirement of the Hon'able Chairman, the Tribunal is defunct, therefore, the case is adjourned for the same before on 17.05.2022



Reader

17.05 2022

Counsel for the appellant present. Mr. Muhammad Asif Masood, Deputy District Attorney for respondents present.

Learned counsel for the appellant seeks adjournment on the ground that she has not prepared the brief. Adjourned but as a last chance. To come up for arguments on 13.06.2022 before D.B at camp court Abbottabad.


(Fareeha Paul)
Member(E)



(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

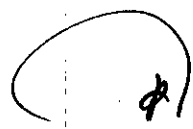
13.06.2022

Counsel for the appellant present.

Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General for respondents present.

Former made a request for adjournment in order to prepare the brief. Adjourned. To come for arguments on 22.07.2022 before D.B at Camp Court, Abbottabad.


(Fareeha Paul)
Member (E)
Camp Court, A/Abad


(Rozina Rehman)
Member (J)
Camp Court, A/Abad

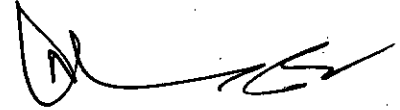
22nd July 2022 1. Counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present.

2. Learned counsel for the appellant referred to the last para of the enquiry report dated 20.03.2017 whereby the desired relief was to be granted to the appellant with the condition that the appellant would withdraw the appeal from the Tribunal. Learned counsel for the appellant further submitted that conditional order was also passed in his favour but this appeal was a hurdle to give effect to his due right. He submitted that the appeal might be disposed of so that the appellant could get his rights. Disposed of accordingly. Consign.

3. *Pronounced in open court in Camp Court Abbottabad and given under our hands and seal of the Tribunal on this 22nd day of July, 2022.*



(Salah Ud Din)
Member(Judicial)



(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad



13.07.2021

Due to cancellation of tour, Bench is not available. Therefore, case to come up for the same as before on 13.10.2021.


Reader

13.10.2021

counsel for the petitioner and Mr. Muhammad Adeel Butt, Addl. AG Asif Junior Clerk for respondents present.

Respondents have furnished reply/comments. Placed on file. To come up for arguments on 16.02.2022 before the D.B. at camp court, Abbottabad.


Chairman
Camp Court, A/Abad

21.10.2020

Representative of appellant on behalf of appellant present.

Usman Ghani learned District Attorney present.

Written reply on behalf of respondents is still awaited. Notice be issued to respondents for 16.12.2020 for reply/comments before S.B at Camp Court, Abbottabad.



(Roziha Rehman)
Member (J)
Camp Court, A/Abad

*Due to COVID 19 case
is adjourned to 17-03-2021*

Reed

17.03.2021

Junior to counsel for the appellant present. Mr. Riaz Khan Paindakheil learned Assistant Advocate General alongwith Muhammad Asif Junior Clerk for respondents present.

Reply/comments on behalf of respondents not submitted. Representative of respondents requested for time to submit reply/comments. Granted. To come up for reply/comments on 13/07/2021 before S.B at Camp Court Abbottabad.



(Atiq ur Rehman Wazir)
Member (E)
Camp Court, A/Abad

Due to covid ,19 case to come up for the same on / /
at camp court abbottabad.

Reader

Due to summer vacation case to come up for the same on 12/
10 / 20 at camp court abbottabad.


Reader

21.10.2019

Appellant present in person. Mr. Usman Ghani, District Attorney alongwith Raza Muhammad Range Officer for the respondents present. Representative of the respondents seeks time. Adjourn. To come up for reply/comments on 16.12.2019 before S.B at camp court, Abbottabad.



Member
Camp court, A/Abad

16.12.2019

None present on behalf of the appellant. Mr. Usman Ghani, District Attorney for the respondents present. Neither written reply on behalf of respondents submitted nor representative of the department is present, therefore, notices be issued to the respondents with the direction to direct the representative to attend the court and submit written reply on the next date positively. Case to come up for written reply/comments on 21.01.2020 before S.B at Camp Court Abbottabad. Notice be also issued to the appellant/counsel for appellant for the date fixed.



(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

21.01.2020


Clerk to counsel for the appellant present. Written reply not submitted. Khurshid Khan SDFO representative of respondent department present and seeks time to furnish reply. Granted. To come up for reply/comments on 18.02.2020 before S.B at Camp Court Abbottabad.



Member
Camp Court, Abbottabad


18.04.2019

Clerk to counsel for the appellant present. Mr. Muhammad Bilal, DDA for respondents present. Written reply/comments not submitted. Requested for adjournment. Adjourned. Case to come up for written reply/comments on 20.06.2019 before S.B at camp court Abbottabad.


(Ahmad Hassan)
Member
Camp Court A/Abad


19.06.2019

Counsel for the appellant and Mr. Muhammad Bilal, DDA for respondents present. Written reply on behalf of respondents not submitted. Notice be issued to the respondents for submission of written reply/comments. Case to come up for written reply/comments on 21.08.2019 before S.B at camp court Abbottabad.


(Ahmad Hassan)
Member
Camp Court A/Abad

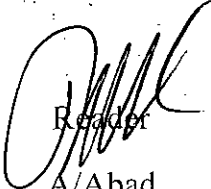
21.08.2019

Learned counsel for the appellant present. Written reply not submitted. Khurshid SDFO representative of the respondent department seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 21.10.2019 before S.B at Camp Court, Abbottabad.


Member
Camp Court A/Abad

15.11.2018

Counsel for the appellant present. Due to retirement of the Hon'ble Chairman the Service Tribunal is incomplete. Tour to Camp Court Abbottabad has been cancelled. To come up for the same on 19.12.2018 at camp court Abbottabad.


Reader
A/Abad


19.12.2018

Counsel for the appellant present. Mr. Usman Ghani, District Attorney for respondents present. Counsel for the appellant seeks time to submit amended appeal. Granted. Case to come up for amended appeal on 20.02.2019 before S.B at camp court, Abbottabad.


Member
Camp Court, A/Abad

20.02.2019

Clerk of counsel for the appellant present. Mr. Muhammad Bilal Khan, Deputy District Attorney for the respondents present. Clerk of counsel for the appellant submitted amended appeal. Copy of the same be issued to the respondents for written reply/comments for 18.04.2019 before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

19.07.2018

Appellant Sultan Mehmood in person alongwith his counsel Mr. Abdur Rehman, Advocate present. Arguments heard and file perused.


During the course of arguments, it was brought into the notice of this Tribunal that during the pendency of the appeal, not only inquiry was conducted by the respondents but even the appellant services were regularized but with immediate effect. However, neither these documents are placed on file nor the same have been annexed by the respondents. At this stage, learned counsel for the appellant requested to allow him to amend the appeal so as the documents relating to the above mentioned proceedings are also made as a part of this appeal as he is still aggrieved of the said subsequent order by not giving him the seniority from due date. Request is genuine, as such, in the interest of justice, is allowed. Hence case to come up for amended appeal on 20.09.2018 before S.B at Camp Court, Abbottabad.


Member


Chairman
Camp Court, A/Abad

19.09.2018


Since 21st September, 2018 has been declared as public holiday on account of Moharram, therefore, case is adjourned to 15.11.2018 for submission of amended appeal before the S.B at camp court, Abbottabad.


Chairman
Camp court, A/Abad

20.03.2018

Counsel for the appellant and Mr. Usman Ghani, District Attorney for the respondents present. Wakalatnama in favour of Abdur Rahman Qadar, Advocate submitted. Learned counsel for the appellant seeks adjournment. To come up for arguments on 22.05.2018 before D.B at camp court, Abbottabad.



Member


Chairman
Camp court, A/Abad

22.05.2018


Junior to counsel for the appellant present. Mr. Muhammad Jan learned Deputy District Attorney present. Junior counsel for the appellant seeks adjournment as learned counsel for the appellant is not available. Adjourned. To come up for arguments on 25.06.2018 before D.B at camp court Abbottabad.


Member


Chairman
Camp court, A/Abad

25.06.2018

Appellant Sultan Mahmood in person present. Mr. Usman Ghani, District Attorney for the respondents present. Appellant seeks adjournment as his counsel has not reached from Peshawar. To come up for arguments on 19.07.2018 before the D.B at camp court, Abbottabad.


Member
Camp court, A/Abad

17.04.2017


Appellant with counsel and Mr. Muhammad Siddique, Sr.GP for the respondents present. Rejoinder submitted. Due to incomplete bench arguments could not be heard. To come up for final hearing before the D.B on 16.10.2017 at camp court, Abbottabad.


Chairman
Camp court, A/Abad

16.10.2017

Appellant with counsel present. Mr. Muhammad Bilal, Deputy District Attorney for the respondents present. Learned counsel for the appellant seeks adjournment. The learned DDA also seeks adjournment as representative of the respondents is not in attendance. Adjourned. To come up for arguments on 16.01.2018 before the D.B at camp court, Abbottabad.



Member


Chairman
Camp court, Abbottabad.

16.01.2018

Junior to counsel for the appellant and Mr. Usman Ghani, District Attorney for respondents present. Junior to counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 20.03.2018 before D.B at camp court, Abbottabad.


Member


Chairman
Camp court, A/Abad.

19.11.2015

Appellant in person and Mr. Muhammad Siddique, Sr.G.P for respondents present. Arguments could not be heard due to non-availability of D.B. To come up for final hearing before D.B on 20.6.2016 at Camp Court A/Abad.


Chairman
Camp Court A/Abad

20.06.2016


Appellant in person, Mr. Muhammad Siddique Sr.GP for the respondents present. Counsel for the appellant has not turned up from Peshawar. Requested for adjournment. To come up for final hearing on 23.11.2016 before D.B at camp court, Abbottabad.


Member


Chairman
Camp Court, A/Abad.

23.11.2016

Appellant in person and Mst. Bushra Bibi, Government Pleader for respondents present. The Bench is incomplete, therefore arguments could not be heard. To come up for final hearing before D.B on 17.04.2017 at camp court, Abbottabad.


Chairman
Camp Court, A/Abad

10.03.2015

Appellant with counsel and Mr. Zahoor Jan, Supdt. alongwith Addl. A.G for respondents present. Requested for adjournment. To come up for written reply on 16.4.2015 before S.B.


Chairman

16.4.2015

Appellant with counsel and Mr. Zahoor Jan, Supdt. alongwith

Addl. A.G for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing. The appeal pertains to territorial limits of Hazara Division and as such to be heard at Camp Court Abbottabad on 22.7.2015.


Chairman

22.7.2015

Appellant in person and Mr. Muhammad Tahir Aurangzeb, G.P for respondents present. Due to non-availability of D.B arguments could not be heard. To come up for final hearing before D.B at camp court A/Abad on 19.11.2015.


Chairman
Camp Court A/Abad

3
Appeal No. 357/2014
Mr. Sultan Mahmood
Counsel for the appellant present. Preliminary arguments

07.05.2014

heard and case file perused. Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. Against the original order dated 08.10.2013, he filed departmental appeal on 28.10.2013, which has been rejected on 03.01.2014 as received to the appellant on 23.02.2014, hence the present appeal on 14.03.2014. He further contended that the final order is not a proper order as no reason has been given and issued in violation of Rule-5 of the Civil Servant (Appeal) Rules 1986. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notices be issued to the respondents. To come up for written reply/comments

Appellant Deposited
Security & Process Fee
Rs. 200/-
Receipt is Attached with File

on 15.07.2014.

Member

4
07.05.2014

This case be put before the Final Bench for further proceedings.

Chairman

15-7-14

Re Monthly bench is on recess
therefore, case is adjourned to 25-11-14

Reader

25.11.2014

Appellant in person and Mr. Zahid Ali, DFO for respondents with Mr. Muhammad Adeel Butt, AAG present. The Tribunal is incomplete. To come up for written reply/comments on 10.03.2015.



Reader

Form-A

FORM OF ORDER SHEET

Court of _____

Case No. 351/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	14/03/2014	<p>The appeal of Mr. Sultan Mehmood presented today by Mr. Shahzada Irfan Zia Advocate, may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	20-3-2014	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>7-5-2014</u></p> <p style="text-align: right;"> CHAIRMAN</p>

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. 351/of 2014.

Sultan Mehmood, Acting Deputy Ranger.

Appellant

VERSUS

Province of Khyber Pakhtunkhwa and others.

Respondents

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(3)	Order of Acting Charge dated 18-12-2009.	"C"	⑬
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(5)	Seniority List dated 20-02-2012.	"E"	19-20
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Dated: 15-1-2019

Through:


Appellant


(ABDUL REHMAN QADAR)
Advocate Supreme Court of Pakistan
at Haripur.


(LUBNA KHAN)
Advocate High Court
at Abbottabad.

②

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. 351/of 2014.

Sultan Mehmood, Acting Deputy Ranger, (now retired)

Garhi Habib Ullah Forest Range,

Kaghan Forest Division, Garhi Habib Ullah.... **Appellant**

VERSUS

1. Province of Khyber Pakhtunkhwa through Secretary Environment Department, Peshawar.
- ✓ 2. Chief Conservator of Forests, Central Southern Forests Region, Khyber Pakhtunkhwa, Peshawar.
- ✓ 3. Chief Conservator of Forests, Northern Forest Region-II, Abbottabad.
- ✓ 4. Conservator of Forest/Project Director, Watershed Management Circle, Abbottabad....

Respondents

**AMENDED APPEAL UNDER SECTION 4 OF
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT 1974 AGAINST THE IMPUGNED FINAL ORDER
DATED 03-01-2014 RECEIVED/COMMUNICATED TO
THE APPELLANT ON 23-02-2014, WHEREBY HIS
DEPARTMENTAL APPEAL FOR CONFIRMATION AS
DEPUTY RANGER HAS BEEN REJECTED BY
RESPONDENT NO. 2, WITHOUT ANY REASON,
DISREGARD OF THE RULES.**

Respectfully Sheweth:

FACTS OF THE CASE

1. That the appellant has filed the above titled appeal before this Honourable Tribunal, the same was matured for arguments however, during course of arguments, this Honourable Tribunal was of the view that the appellant may file an amended appeal, so the development carried out/occurred in case of the appellant during the pendency of the above titled appeal, particularly the factum of an inquiry, which was conducted by the Respondents, in result of which although the services of the appellant were regularized as Deputy Ranger but with immediate effect i.e. 18-07-2014 instead of 08-10-2013 thus, the grievance of the appellant to the extent of regularization of service as Deputy Ranger was redressed however, the appellant kept still illegally deprived from his promotion as Deputy Ranger since 08-10-2013, which also further effected the promotion of the appellant from Deputy Ranger BPS-12 to the post of Forest Ranger BPS-16 on regular basis. (Copies of the Inquiry Report and that of the Office Order No. 85, dated 12-01-2018 are appended as "A&B").

2. That the relevant brief facts of the case are as under:-
3. That the appellant is a regular member of Provincial Civil Service of Forest Department and presently serving as Deputy Ranger on Acting Charge Basis.
4. That on 18-12-2009 the appellant alongwith others was promoted as Deputy Ranger in BPS-9 on Acting Charge Basis on the recommendation of Departmental Promotion Committee. (Annex: C).
5. That the appellant completed his probation period successfully to the entire satisfaction of his superiors and no cause of complaint was ever reported against him.
6. That the appellant is entitled for confirmation against the post of Deputy Ranger, but due to lukewarm procedure of the department, he was not confirmed against the post of Deputy Ranger and kept on Acting Charge Basis till 18-07-2014.
7. That is astonishing that the department adopted the policy of pick and choose and passed the confirmation order of one Mr. Muhammad Hanif (Deputy Ranger) who is far junior to the appellant. According to the seniority lists circulated from time to time, it is crystal clear that Mr. Muhammad Hanif

is junior to appellant and both were promoted as Deputy Range on Acting Charge Basis in the same order dated 18-12-2009, but the appellant has been ignored while his junior colleague Mr. Muhammad Hanif was confirmed against the post of Deputy Ranger, thus the conduct of Respondents is not above board rather discriminatory and against the principles of seniority. (Annex: D, E & F).

8. That feeling aggrieved the appellant filed his departmental appeal for confirmation/regularization against the post of Deputy Ranger dated 28-10-2013, but to his utter dismay that his departmental appeal has been rejected by Respondent No. 2 vide order dated 03-02-2014. (Annex: G & H).
9. That as per rules persons appointed to posts by initial recruitment promotion or transfer shall be on probation for a period of one year. The appointing authority, if considers necessary may extend the probation period for one year as may be specified at the time appointment. If no order is issued on the expiry of the extended period of probation, the period of probation shall be deemed to have been successfully completed. The appellant has already completed his probation period successfully and

there existed nothing against him and it is the apathy and negligence of the department that they failed to pass the confirmation order of the appellant and the appellant is not supposed to suffer for inaction or omission of the department. (Annex: I).

10. That clear vacancies were available against which the appellant could be confirmed as it is evident that Mr. Muhammad Hanif who was junior to appellant, but he has already been confirmed, while the same benefit is being denied to the appellant and he has not been treated in accordance with law.

In view of the aforesaid facts and circumstances of the case it is humbly prayed that the impugned order dated 03-01-2014 received/communicated to the appellant on 23-02-2014 may kindly be set aside, being illegal and void, directing the Respondents to issue/pass regularization/confirmation order of the appellant against the post of Deputy Ranger from the date when his juniors were confirmed against the said post i.e. 08-10-2013.

Any other relief though not specifically asked for to which the appellant is found entitled in the

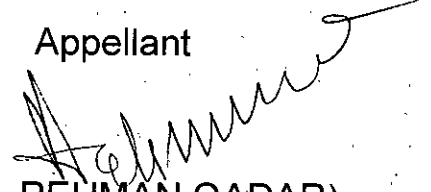
circumstances of the case may also be granted to the
appellant.

Dated: 15-01-2019.

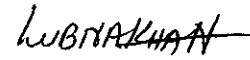
Through:



Appellant



(ABDUL REHMAN QADAR)
Advocate Supreme Court of Pakistan
at Haripur.



(LUBNA KHAN)
Advocate High Court
at Abbottabad.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

8

Service Appeal No. 351/of 2014.

Sultan Mehmood, Acting Deputy Ranger.

Appellant

VERSUS

Province of Khyber Pakhtunkhwa and others.

Respondents

AMENDED APPEAL UNDER SECTION 4 OF
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT 1974 AGAINST THE
IMPUGNED FINAL ORDER DATED 03-01-2014.

AFFIDAVIT

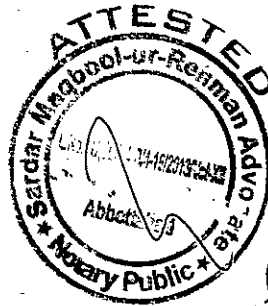
I, Sultan Mehmood S/O Fida Muhammad, do hereby declare on oath that the contents of accompanying Amended Appeal are true and correct to the best of my knowledge and belief.

Dated: 15-01-2019.

Deponent

Identified by:

(ABDUL REHMAN QADAR)
ASC, Haripur.



(9)

Annexure A to B

**ENQUIRY REPORT ON THE APPEAL OF MR. SULTAN MEHMOOD DEPUTY RANGER DATED
20.03.2017 PREFERRED BEFORE CCF-I**

In pursuance of appeal preferred by Mr. Sultan Mehmood Deputy Ranger Watershed Circle the Chief Conservator of Forests Central Southern Forest Region-I, constituted a committee consisting of the following to thresh out the case and report.

1. Mr. Javed Arshad
Conservator of Forests
Watershed Management Circle Chairman
2. Qazi Muhammad Younis
Conservator of Forests
Upper Hazara Forest Circle Member
3. Mr. Zahoor Jan
Senior Clerk Office of CCF-I, Peshawar Member

The committee held its meeting on 18.05.2017 and thrash out the relevant record which concludes that:

According to the seniority list of Watershed Management Circle stood on 28-02-2009, the seniority position is as under:

Name of official
Mr. Sultan Mehmood at Sl. No.2
Mr. Zareen Gul at Sl. No.16

1. Similarly according to the combined seniority list of Forester of Abbottabad Circle and Watershed Circle as stood on 31-03-2009, circulated by Conservator of Forests Hazara No.2058-67/GE dated 11-04-2009, the appellant is falling in the seniority list as under:

Name of official
Mr. Sultan Mehmood at Sl. No.11
Mr. Zareen Gul at Sl. No.51

In the meeting of Departmental Promotion Committee held under the Chairmanship of Chief Conservator of Forests NWFP on 24-11-2009, the promotion of Forester to the rank of Deputy Ranger on acting charge basis was recommended through minutes of meeting on the basis of seniority/cum-fitness as well as on merit quota as under:

9

(10)

S. No.	Name of Forester	Date of appointment in present grade as Forester	Recommendation
1	Mr. Muhammad Iqbal S/O Jalal Khan	15-06-1977	The Forester was appointed as Deputy Ranger on acting charge basis with effect from 28-04-2008, therefore the DPC recommended him for regular promotion to the rank of Deputy Ranger
2	Mr. Manzoor Ahmed	24-06-1977	The Forester was appointed as Deputy Ranger on acting charge basis with effect from 28-04-2008, therefore the DPC recommended him for regular promotion to the rank of Deputy Ranger
3	Syed Mubin Shah	24-06-1977	The Forester was appointed as Deputy Ranger on acting charge basis with effect from 28-04-2008, therefore the DPC recommended him for regular promotion to the rank of Deputy Ranger
4	Mr. Javed Sultan	10-08-1977	Due to recovery of Rs.385896/45 on a/c of shortage of Food Commodities and appeal of the Forester is under trial in Supreme Court of Pakistan the DPC deferred the case of Forester concerned.
5	Mr. Sultan Khan	21-08-1978	Recommended for appointment to the post of Deputy Ranger on acting charge basis.
6	Mr. Muhammad Maqbool	22-08-1978	The Forester is under investigation with NAB authorities therefore the DPC deferred the case of the Forester concerned.
7	Mr. Muhammad Iqbal S/O Gohar Rehman	06-08-1978	Recommended for appointment to the post of Deputy Ranger on acting charge basis.
8	Mr. Sultan Mehmood	26-08-1978	Recommended for appointment to the post of Deputy Ranger on acting charge basis.
9	Mr. Muhammad Hanif	28-08-1978	Recommended for appointment to the post of Deputy Ranger on acting charge basis.
10	Mr. Zareen Gul	18-03-1985	Recommended for appointment to the post of Deputy Ranger on acting charge basis against merit quota.
11	Mr. Muhammad Riasat	01-10-1986	Recommended for appointment to the post of Deputy Ranger on acting charge basis against merit quota.

The promotion order of the appellant was issued on seniority Cum-fitness and official at S. No. 10 against merit quota vide Conservator of Forests Abbottabad Circle office order No.91 dated 18-12-2009, as under:



11

S. No.	Name of Forester	Present posting
1	Mr. Sultan Khan S/O Umer Khan	Upper Kohistan Forest Division Dasso
2	Mr. Muhammad Iqbal S/O Gohar Rehman	Kunhar Watershed Division Mansehra
3	Mr. Sultan Mehmood S/O Fida Muhammad	Unhar Watershed Division Mansehra
4	Mr. Muhammad Hanif S/O Muhammad Qasim	Kaghan Forest Division Garhi Habibullah
5	Mr. Zareen Gul S/O Said Kamal Shah (against merit quota)	Buner Watershed Division Swari

As per promotion order Mr. Sultan Mehmood is falling at S. No.3 where as Mr. Zareen Gul at S. No.5 i.e junior than the appellant.

In view of the Government Notification No.SO (Estt) ENVT/10-4/2K11 dated 05.10.2012, regarding constitution/revision of Circle and maintenance of seniority list on Circle basis the above Deputy Rangers working on acting charge basis were recommended for promotion on regular basis vide Conservator of Forests Watershed No.2317/E dated 25-02-2013, alongwith working paper as under:

S. No.	Name	Rank
1	Mr. Sarfraz Khan	D/Ranger
2	Mr. Masoodur Rehman	D/Ranger
3	Mr. Zareen Gul	D/Ranger
4	Mr. Sultan Mehmood	D/Ranger
5	Mr. Shabir Ahmed	Forester
6	Mr. Muhammad Nazir	Forester
7	Mr. Muhammad Sharif	Forester

In the above working papers/recommendation the seniority of the appellant was erroneously disturbed and being senior most was kept one step junior than the official at Sl. No.3.

By virtue of above working paper/recommendation meeting of Departmental Promotion Committee was held on 30-09-2013, under the Chairmanship of Chief Conservator of Forests Central Southern Forest Region-I, and recommended promotion of the Foresters including Mr. Zareen Gul on regular basis where as the name of appellant is all the more found omitted from the DPC proceedings. (copy enclosed)

In view of above recommendation the Conservator of Forests Watershed issued order No.12 dated 08-10-2013, regarding regularization of the Deputy Ranger pertaining to Watershed Circle as under:

S. No	Name
1	Mr. Masood-ur-Rehman
2	Mr. Zareen Gul

8

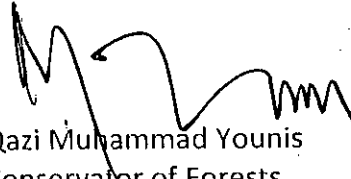
The appellant was remained on acting charge basis when Departmental Promotion Committee was held on 10.06.2014 recommended promotion of Deputy Ranger on regular basis (copy enclosed) and accordingly his promotion order was issued by Conservator of Forests Watershed Circle vide order No.3 dated 18.07.2014.

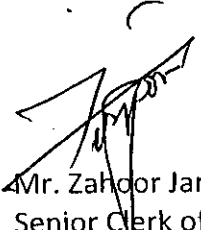
The recommendation in the working paper and proceedings of DPC dated 30.09.2013, has intentionally or inadvertently by passed the promotion of appellant whereas, the other officials alleged in the appeal have got promotion to the rank of Forest Rangers.

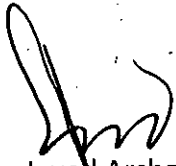
The promotion cases also delayed due to the reason that the DPC could not held their meeting since 2009-2013 because of persistent pressure/agitation from the President of F/Guards, Foresters and D/Rangers association regarding bifurcating of Circles and non acceptance of the integrated seniority list.

Recommendation

1. Since the appellant has deprived from the legal right of timely promotion/seniority hence the committee recommend restoration of the seniority in the cadre of D/Ranger from the date of promotion order No.12 dated 8.10.2013 with consideration of case for further promotion as Forest Ranger subject to condition that the appellant shall withdraw his case/appeal from the Court of Khyber Pakhtunkhwa Service Tribunal.


Qazi Muhammad Younis
Conservator of Forests
Upper Hazara Forest Circle
Mansehra (Member)


Mr. Zahoor Jan
Senior Clerk office of
Chief Conservator of Forests
Central Southern Forest Region-I,
Peshawar (Member)


Mr. Javed Arshad
Conservator of Forests
Watershed Management Circle
Abbottabad (Chairman)

ANNEX-C (13) (A) (4)

OFFICE ORDER No. 911 DATED ABBOTTABAD THE 18. 12/2009 BY
 SYED KHURSHID ANWAR, CONSERVATOR OF FORESTS, ABBOTTABAD FOREST
 CIRCLE, ABBOTTABAD

As recommended by Departmental Promotion Committee in its meeting held on 24.11.2009 under the Chairmanship of Chief Conservator of Forests, NWFP, Peshawar, the following Foresters are hereby appointed as Deputy Ranger in DRS-09 (Rs. 3820-230-10720) with immediate effect on acting charge basis against the existing vacancies of Deputy Rangers in District Government:

S.#	Name of Forester	Present posting
1.	Mr. Sultan Khan S/O Umer Khan	Upper Kohistan Forest Division, Dasso
2.	Mr. Muhammad Iqbal S/O Gohar Rehman	Kunhar Watershed Division, Manshra
3.	Mr. Sultan Mehmoed S/O Fida Muhammad	Unhar Watershed Division, Manshra
4.	Mr. Muhammad Hanif S/O Muhammad Qasim	Kaghan Forest Divn., Garhi Habibullah
5.	Mr. Zarin Gul S/O Said Kamal Shah (against merit quota)	Bunair Watershed Division, Swari

This order is purely temporary and will not confer any right for continuity on abolition of the posts and the official will be liable to reversion to original post without any notice.

The Deputy Rangers will be on probation for a period of one year in terms of section 6(2) of the NWFP Civil Servant ACT, 1973 read with rule 15(1) of the NWFP Civil Servant (Appointment, Promotion and Transfers) Rules, 1989.

Further posting order of above Deputy Rangers are being issued separately.

Sd/- Syed Khurshid Anwar,
 Conservator of Forests,
 Abbottabad Forest Circle,
 Abbottabad.

Memo.

Copy forwarded to:

- 1- The Chief Conservator of Forests, NWFP, Peshawar for favour of information with reference to his letter No. 2406-7/E, dated 05-12-2009 and No. 2491/E, dated 10-12-2009.
 - 2- The Project Director/Ch, Watershed Management Project, Abbottabad for information and necessary action.
 - 3- The Conservator of Forests, Upper Hazara Forest Circle, Manshra for information.
 - 4- The Divisional Forest Officer, Upper Kohistan Forest Division, Dasso.
 - 5- The Divisional Forest Officer, Kunhar Watershed Division, Manshra.
 - 6- The Divisional Forest Officer, Unhar Watershed Division, Manshra.
 - 7- The Divisional Forest Officer, Bunair Watershed Division, Swari.
 - 8- The Divisional Forest Officer, Kaghan Forest Division, Garhi Habibullah.
 - 9- The Executive District Officers (Agriculture) -
 - Manshra.
 - Kohistan.
 - Hacıpur.
 - Abbottabad.
- For information and necessary action.
 All concerned for information and necessary action.

Handwritten notes:
 Copy to...
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Sd/-
 Conservator of Forests,
 Abbottabad Circle,
 Abbottabad

(Annex B) 38
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INTEGRATED SENIORITY LIST OF FORESTERS COMPRISING OF ABBOTTABAD CIRCLE AND WATERSHED AS IT STOOD ON 31-03-2009

S. #	Name of Forester	Qualification	Home District	Any test passed	Date of Birth	Date of appointment in Govt. Service	Present grade	Cadre	remarks
1.	2.	3.	4.	5.	6.	7.	8.	9.	10.
1	Mr. Muhammad Iqbal S/O Jaffer Khan	Matric	Abbottabad	Trained	20-06-1953	15-06-1977	15-06-1977	-do-	Appointed as Deputy Ranger on acting charge basis w.e.f 28-04-2008
2	Mr. Manzoor Ahmad Syed Noor Shah	Matric	Abbottabad	-do-	12-03-1959	24-06-1977	24-06-1977	-do-	-do-
3	Mr. Sarfraz Khan S/O Muhammad Ashraf	Matric	Haripur	-do-	08-08-1950	19-06-1977	02-08-1977	W/Shed Circle	-do-
4	Mr. Javed Sultan	B.A	Abbottabad	-do-	01-05-1954	11-11-1977	02-08-1977	-do-	-do-
5	Mr. Masood-ur-Rehman S/O Jamadali	Matric	Mansehra	-do-	01-06-1952	10-08-1977	10-08-1977	-do-	BS-09, 11-05-1998
6	Mr. Muhammad Farooq	B.A	Mansehra	-do-	20-06-1954	26-10-1977	26-10-1977	-do-	Appointed as Deputy Ranger on acting charge basis w.e.f 28-04-2008
7	Mr. Sultan Khan	D.Com	Abbottabad	-do-	02-07-1956	19-08-1978	19-08-1978	A'Abad Circle	Appointed as Deputy Ranger on acting charge basis w.e.f 28-04-2008
8	Mr. Muhammad Maqbool	M.A	Abbottabad	-do-	02-06-1951	31-03-1978	21-08-1978	-do-	BS-09, 21-06-1994
9	Mr. Muhammad Iqbal S/O Gohar Rehman	M.A	Mansehra	-do-	10-04-1960	22-08-1978	22-08-1978	-do-	BS-09, 01-06-1994
10	Mr. Muhammad Iqbal S/O Gohar Rehman	M.A	Mansehra	-do-	19-06-1954	26-08-1978	26-08-1978	W/Shed Circle	BS-09, 11-05-1998
11	Mr. Muhammad Hanif	M.A	Mansehra	-do-	08-04-1958	26-08-1978	26-08-1978	-do-	BS-09, 01-05-1994
12	Mr. Shabir Ahmad	F.A	Mansehra	-do-	01-02-1955	28-08-1978	28-08-1978	A'Abad Circle	BS-09, 01-06-1994
13	Mr. Taj Muhammad	Matric	Abbottabad	-do-	28-04-1960	13-09-1978	13-09-1978	W/Shed Circle	BS-09, 11-05-1998
14	Mr. Muhammad Pervaz	Matric	Mansehra	-do-	19-09-1955	06-04-1976	20-02-1977	A'Abad Circle	BS-09, 11-05-1998
15	Mr. Muhammad Nazir	Matric	Mansehra	-do-	03-04-1959	13-03-1979	03-03-1979	-do-	BS-09, 02-12-1997
16	Mr. Muhammad Tariq	Matric	Mansehra	-do-	15-02-1961	27-05-1979	27-05-1979	W/Shed Circle	-do-
17	Mr. Nisar Ahmad S/O Sanaullah Khan	M.A	Mansehra	-do-	01-12-1957	17-09-1979	17-09-1979	A'Abad Circle	BS-09, 25-09-1997
18	Mr. Muhammad Mumtaz	B.A	Mansehra	-do-	11-05-1959	18-09-1979	18-09-1979	-do-	BS-09, 25-09-1997
19	Mr. Muhammad Gulam	Matric	Mansehra	-do-	01-01-1959	22-09-1979	22-09-1979	-do-	BS-09, 25-09-1997
20	Mr. Nisar Ahmad S/O Muhammad Raza	F.A	Mansehra	-do-	24-03-1959	22-09-1979	22-09-1979	-do-	BS-09, 25-09-1997
21	Mr. Tariq Jaffer	Matric	Abbottabad	-do-	06-04-1961	24-03-1981	24-03-1981	-do-	BS-07
22	Mr. Gulfray S/O Mayoor	B.A	Frislan	-do-	18-04-1956	06-06-1981	06-06-1981	-do-	BS-07
23	Mr. Rustom Khan	F.A	Kuistan	-do-	04-01-1957	27-09-1981	27-09-1981	-do-	BS-07
24	Mr. Muhammad Asghar	Matric	Rattagram	-do-	01-03-1959	17-09-1981	27-09-1981	-do-	BS-07
25	Mr. Muhammad Iqbal S/O Haji Muhammad Younis	Matric	Mansehra	-do-	21-11-1962	27-09-1981	27-09-1981	-do-	BS-07
26					01-04-1953	12-11-1975	01-11-1981	-do-	BS-07

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1	2	3	4	5	6	7	8	9	10
27	Mr. Muhammad Sharif	Matric	Mansehra	Trained	15-01-1956	01-06-1976	01-11-1981	-do-	BS-07
28	Mr. Abid Hussain	B.A	Mansehra	-do-	15-04-1961	23-11-1981	23-11-1981	-do-	BS-07
29	Mr. Khurshid Khan	Matric	Abbottabad	-do-	02-12-1963	25-11-1981	25-11-1981	-do-	BS-07
30	Mr. Naimatullah	Matric	Swat	-do-	12-12-1954	01-01-1983	01-01-1983	W/Shed Circle	BS-07
31	Mr. Gulfraz S/O Amzar	Matric	Swat	-do-	11-10-1954	01-01-1983	01-01-1983	-do-	BS-07
32	Mr. Muhammad Zahir Khan	Matric	Swat	-do-	01-01-1958	01-01-1983	01-01-1983	-do-	BS-07
33	Mr. Muhammad Rageen	Matric	Battagram	-do-	15-05-1956	01-03-1983	01-03-1983	A'Abad Circle	Appointed as Deputy Ranger on acting charge. basis wt. 28-04-2008
34	Mr. Abdul Rashid S/O Safiullah	Matric	Haripur	-do-	15-07-1952	07-05-1973	28-05-1983	W/Shed Circle	BS-07
35	Mr. Shah-e-Room	Matric	Battagram	-do-	03-01-1955	19-03-1975	01-10-1983	W/Plan Circle	BS-09, S-04-1987
36	Syed Wahab Shah	Matric	Battagram	-do-	18-05-1959	23-01-1979	01-10-1983	A'Abad	BS-07
37	Mr. Jamdad Khan	Matric	Kohistan	-do-	18-01-1957	01-10-1983	01-10-1983	-do-	BS-07
38	Mr. Muhammad Shafiqat	B.A	Haripur	-do-	01-01-1950	01-10-1983	01-10-1983	W/Plan Circle	BS-07
39	Mr. Iltaf Quareshi	Matric	Kohistan	-do-	05-05-1961	01-10-1983	01-10-1983	A'Abad Circle	BS-07
40	Mr. Zia-ud-Din	Matric	Kohistan	-do-	05-05-1961	01-10-1983	01-10-1983	-do-	BS-07
41	Mr. Baqir Hussain Shah	F.A	Mansehra	-do-	15-03-1963	01-10-1983	01-10-1983	W/Plan Circle	BS-07
42	Mr. Anwar Khan	Matric	Kohistan	-do-	01-05-1965	01-10-1983	01-10-1983	A'Abad Circle	BS-07
43	Mr. Shaujaht Ali	B.A	Swat	-do-	10-02-1963	01-11-1983	01-11-1983	W/Shed Circle	BS-07
44	Mr. Haider Zaman	Matric	Abbottabad	-do-	12-01-1953	30-06-1974	01-09-1984	-do-	BS-07
45	Mr. Baidar Bakht	Matric	Mansehra	-do-	08-01-1953	15-01-1979	01-10-1984	-do-	BS-07
46	Mr. Muhammad Riaz S/O Mir Akbar	F.A	Abbottabad	-do-	15-06-1963	01-10-1984	01-10-1984	-do-	BS-07
47	Mr. Aurangzeb S/O Aziz-ur-Rehman	Matric	Mansehra	-do-	09-09-1960	02-06-1979	25-10-1984	-do-	BS-07
48	Mr. Abdul Razzaq	Matric	Swat	-do-	06-06-1953	01-06-1985	06-01-1985	W/Shed Circle	BS-07
49	Mr. Said Amir Shah	M.A	Swat	-do-	02-02-1959	12-03-1985	12-03-1985	-do-	BS-07
50	Mr. Gul Rehman	B.Sc. (Forestry)	Swat	-do-	01-01-1965	13-03-1985	13-03-1985	-do-	BS-07
51	Mr. Zarin Gul	B.A	Swat	-do-	01-04-1964	18-03-1985	18-03-1985	-do-	BS-07
52	Mr. Hazrat Shah	Middle	Abbottabad	-do-	15-10-1951	05-09-1975	05-09-1985	W/Shed Circle	BS-07
53	Mr. Aurangzeb S/O Allah Dad	Matric	Mansehra	-do-	21-09-1949	31-03-1975	30-09-1985	A'Abad Circle	BS-07
54	Mr. Muhammad Anwar S/O Muhammad Roshan	Matric	Mansehra	-do-	01-05-1958	27-08-1981	30-09-1985	A'Abad Circle	BS-07
55	Mr. Muhammad Javed S/O Mohib-ur-Rehman	F.A	Mansehra	-do-	15-04-1953	30-09-1985	30-09-1985	-do-	BS-07
56	Mr. Riaz Muhammad	Matric	Mansehra	-do-	11-11-1952	26-03-1974	06-03-1986	-do-	BS-07

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1	2	3	4	5	6	7	8	9	10
57	Mr. Mukhtiar Shah	Matric	Mansehra	Trained	01-01-1952	31-03-1975	09-04-1986	-do-	BS-07
58	Mr. Siraj-ud-Din	B.A	Kohistan	-do-	25-09-1966	23-06-1988	23-06-1986	A'Abad Circle	BS-07
59	Mr. Muhammad Riasat S/O Qayyum	Matric	Abbottabad	-do-	25-03-1966	01-10-1986	01-10-1986	-do-	BS-07
60	Mr. Muhammad Anwar S/O Fazal-ur-Rahman	F.A	Abbottabad	-do-	15-03-1966	01-10-1986	01-10-1986	A'Abad Circle	BS-07
61	Mr. Tahir Hussain Shah	F.A	Mansehra	-do-	05-02-1963	23-11-1986	23-11-1986	-do-	BS-07
62	Sardar Mehmood	Matric	Mansehra	-do-	15-03-1951	03-05-1975	11-12-1986	-do-	BS-07
63	Mr. Ashiq Zaman	F.A	Swat	Un-trained	18-01-1951	11-10-1972	23-08-1988	W/Shed Circle	BS-07
64	Mr. Naem Gohar	F.A	Abbottabad	-do-	14-12-1963	01-10-1988	01-10-1988	W/Plan Circle	BS-07
65	Mr. Bashir Ahmad	M.A	Mansehra	-do-	11-03-1965	01-10-1988	01-10-1988	-do-	BS-07
66	Mr. Amlad Khan	F.A	Mansehra	-do-	06-05-1968	01-10-1988	01-10-1988	-do-	BS-07
67	Mr. Muhammad Fiaz	Matric	Mansehra	-do-	10-03-1961	12-03-1979	25-09-1989	-do-	BS-07
68	Mr. Muhammad Javed S/O Chujam Rabbani	B.A	Mansehra	-do-	10-05-1960	01-10-1989	01-10-1989	-do-	BS-07
69	Syed Ibrar Hussain Shah	Matric	Mansehra	-do-	12-02-1965	01-10-1989	01-10-1989	W/Plan Circle	BS-07
70	Mr. Sajid Khan	B.A	Abbottabad	-do-	13-06-1970	02-11-1989	02-11-1989	-do-	BS-07
71	Mr. Muhammad Asif	B.A	Abbottabad	-do-	17-11-1967	04-11-1989	04-11-1989	A'Abad Circle	BS-07
72	Mr. Mashal Khan	Matric	Mansehra	-do-	18-05-1952	23-05-1975	16-12-1989	-do-	BS-07
73	Mr. Mehmood	Matric	Abbottabad	Trained	01-01-1960	03-07-1980	26-12-1989	W/Shed Circle	BS-07
74	Mr. Muhammad Iqbal	F.A	Haripur	-do-	05-05-1970	23-05-1990	23-05-1990	-do-	BS-07
75	Mr. Abdur Rashid	Matric	Abbottabad	-do-	07-01-1959	21-08-1977	01-07-1990	-do-	BS-07
76	Mr. Gul Zaman	Matric	Mansehra	-do-	19-01-1959	21-08-1979	21-09-1992	W/Shed Circle	As pointed as Deputy Ranger on acting charge last w.e.f 23-04-2008
77	Mr. Zahoor Ahmad S/O Mir Ahmad	B.Sc	Abbottabad	-do-	25-04-1968	01-10-1992	01-10-1992	-do-	BS-07 (Contractual employee)
78	Mr. Kamran Khan	B.Sc (Forestry)	Abbottabad	-do-	01-05-1970	01-10-1992	01-10-1992	-do-	BS-07
79	Mr. Lakhan	Matric	Swat	-do-	22-10-1949	02-07-1980	17-10-1992	W/Shed	BS-07
80	Mr. Hezarat Rehman	Matric	Swat	-do-	04-04-1957	03-07-1982	17-10-1992	-do-	BS-07
81	Mr. Kishwar Khan	Matric	Swat	-do-	17-12-1951	07-08-1984	17-10-1992	-do-	BS-07
82	Mr. Muhammad Shamraiz	D.Com	Abbottabad	-do-	12-12-1972	22-08-1991	01-11-1992	-do-	BS-07 Contractual employee
83	Mr. Muhammad Bashir S/O Arsala Khan	Matric	Mansehra	-do-	02-01-1957	20-11-1976	28-02-1993	-do-	BS-07

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	2	3	4	5	6	7	8	9	10
4	Mr. Phogul Khan	Matric	Battagram	Trained	01-02-1950	22-04-1974	13-09-1993	-do-	BS-07
5	Mr. Muhammad Yousaf	Matric	Battagram	-do-	17-04-1956	13-06-1975	08-05-1994	-do-	BS-07
6	Mr. Hussan-ul-Maab	Middle	Kohistan	-do-	02-04-1950	12-10-1972	26-09-1994	-do-	BS-07
7	Mr. Umer Sharif	Matric	Battagram	-do-	01-10-1957	07-08-1979	01-06-1995	-do-	BS-07
89	Mr. Masood-ur-Rehman S/O Fazal-ur-Rehman	Matric	Mansehra	Trained	25-04-1960	27-04-1976	18-01-1997	W/Plan Circle	BS-07
90	Mr. Shad Muhammad	Matric	Mansehra	-do-	06-05-1956	28-04-1975	07-04-1997	-do-	BS-07
91	Mr. Saif-ul-Malook	Matric	Battagram	-do-	01-01-1956	17-05-1979	29-10-1997	-do-	BS-07
92	Syed Farooq Shah	Matric	Abbottabad	Trained	06-02-1956	17-11-1973	26-04-2002	-do-	BS-07
93	Mr. Muhammad Daud	Matric	Abbottabad	-do-	02-04-1953	26-07-1975	26-04-2002	-do-	BS-07
94	Mr. Mohib-ul-Haq	F.A	Battagram	-do-	13-06-1961	12-07-1979	27-04-2002	-do-	BS-07
95	Mr. Mushtaq Ahmad	Under Matric	Abbottabad	-do-	10-04-1954	01-04-1976	18-07-2002	W/Shed Circle	BS-07
96	Mr. Mukhtiar Alam	Matric	Abbottabad	-do-	20-01-1958	06-04-1977	15-07-2002	-do-	BS-07
97	Syed Sultan Shah	Matric	Mansehra	-do-	03-07-1952	31-05-1975	16-07-2002	-do-	BS-07
98	Mr. Muhammad Sadiq	Matric	Abbottabad	Un-trained	15-03-1957	17-11-1975	16-07-2002	-do-	BS-07
99	Mr. Muhammad Iqbal S/O Mir Ahmad	Matric	Mansehra	Trained	05-07-1956	24-04-1976	16-07-2002	A'Abad Circle	BS-07
100	Mr. Arif Hussain S/O Khushal Khan	Matric	Mansehra	Under training	16-06-1954	20-11-1976	16-07-2002	W/Shed Circle	BS-07
101	Mr. Afzal Ali	B.A	Battagram	Un-trained	01-01-1958	09-02-1977	12-07-2004	A'Abad Circle	BS-07
102	Mr. Raza Muhammad	Matric	Abbottabad	-do-	01-08-1966	09-01-1990	12-07-2004	-do-	BS-07
103	Mr. Zulfiqar Khan	Matric	Abbottabad	Trained	14-04-1969	14-02-1991	12-12-2004	-do-	BS-07
104	Mr. Janas Khan	Matric	Kohistan	-do-	05-05-1972	19-05-1973	11-01-2005	-do-	BS-07
105	Mr. Masood-ur-Rehman	Matric	Abbottabad	Trained	10-10-1957	22-11-1975	11-02-2005	-do-	BS-07
106	Mr. Afraslab	Matric	Abbottabad	-do-	01-01-1959	08-04-1976	11-02-2005	-do-	BS-07
107	Mr. Amraiz Khan	Matric	Abbottabad	-do-	10-06-1957	14-04-1976	11-02-2005	-do-	BS-07
108	Mr. Muhammad Ajab S/O Gulzar Ahmad	Matric	Abbottabad	-do-	11-04-1953	26-07-1975	15-02-2005	-do-	BS-07
109	Mr. Muhammad Ramzan	Matric	Abbottabad	-do-	21-09-1954	26-07-1975	15-02-2005	-do-	BS-07
110	Mr. Mian Khan	Matric	Abbottabad	-do-	08-06-1953	19-02-1976	15-02-2005	-do-	BS-07
111	Mr. Muhammad Yousaf S/O Sher Ahmad	Matric	Abbottabad	-do-	16-06-1952	24-03-1976	15-02-2005	-do-	BS-07
112	Mr. Summandar Khan	Under Matric	Mansehra	Un-trained	01-05-1972	12-03-1977	26-03-2005	Watershed Circle	BS-07
113	Mr. Muhammad Younis	Matric	Mansehra	Trained	15-04-1958	11-07-1975	12-04-2006	A'Abad Circle	BS-07
114	Mr. Ihtaj Hussain	Matric	Mansehra	Un-Trained	12-07-1953	03-05-1976	12-04-2006	-do-	BS-07
115	Mr. Taj Muhammad	Matric	Mansehra	Trained	09-09-1958	20-11-1976	12-04-2006	-do-	BS-07

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	2	3	4	5	6	7	8	9	10
	Mr. Muhammad Manzoor	Matric	Abbottabad	Un-trained	30-09-1952	24-11-1976	19-08-2006	-do-	BS-07
117	Mr. Istikhar	B.A	Battagram	Un-trained	23-04-1975	21-03-2007	21-03-2007	A'Abad Circle	BS-07
118	Mr. Nisar Ahmad S/O Khalil-ur-Rehman	B.Sc	Mansehra	Trained	06-04-1977	26-03-2007	26-03-2007	A'Abad Circle	BS-07
119	Mr. Muhammad Faqir	Matric	Kohistan	Un-trained	02-04-1952	16-05-1973	23-05-2007	A'Abad Circle	BS-07
120	Mr. Bashir Ahmad S/o Aziz-ur-Rehman	Matric	Abbottabad	Un-trained	10-07-1949	07-05-1974	26-05-2007	-do-	BS-07
121	Mr. Muhammad Naseem	Matric	Mansehra	Un-trained	01-04-1956	10-07-1977	25-09-2007	-do-	BS-07
122	Mr. Rustam Khan	Under Matric	Abbottabad	Un-trained	15-09-1958	18-12-1976	27-09-2007	-do-	BS-07
123	Mr. Muhammad Imtiaz	Matric	Haripur	Un-trained	20-04-1960	18-12-1976	27-09-2007	-do-	BS-07
124	Mr. Muhammad Manzoor	Matric	Mansehra	Un-trained	13-08-1952	12-03-1977	23-11-2007	-do-	BS-07
125	Mr. Gul Naseem	F.Sc	Mansehra	Un-trained	02-04-1984	12-12-2007	12-12-2007	-do-	BS-07
126	Mr. Nazneen Khan	F.A	Mansehra	Un-trained	20-03-1986	12-12-2007	12-12-2007	-do-	BS-07
127	Mr. Muhammad Farhad	F.Sc	Mansehra	Un-trained	04-04-1987	12-12-2007	12-12-2007	-do-	BS-07
128	Mr. Naseem Khan	F.Sc	Mansehra	Under training	16-06-1987	12-12-2007	12-12-2007	-do-	BS-07
129	Syed Itaf Hussain Shah	Matric	Mansehra	Un-trained	21-06-1959	26-06-1977	18-01-2008	-do-	BS-07
130	Mr. Uzair	Matric	Haripur	Un-trained	01-01-1988	20-03-2008	20-03-2008	-do-	BS-07
131	Mr. Muhammad Saeed	Middle	Abbottabad	Un-trained	18-07-1952	21-12-1976	18-07-2008	-do-	BS-07
132	Mr. Wajid Ali Shah	Middle	Haripur	Un-trained	12-12-1953	28-12-1976	18-07-2008	-do-	BS-07
133	Mr. Khawaj Muhammad	Matric	Mansehra	Un-trained	12-12-1959	15-06-1977	04-09-2008	-do-	BS-07
134	Mr. Muhammad Yousaf	Matric	Mansehra	Un-trained	01-06-1953	01-07-1977	04-09-2008	-do-	BS-07
135	Mr. Muhammad Faridoon	Matric	Mansehra	Un-trained	12-10-1959	18-01-1980	04-09-2008	-do-	BS-07

Conservator of Forests,
Hazara Circle,
Abbottabad.
(T/Mir)

18

H

... List of Foresters in respect of Watershed Management Circle Abbottabad as it stood on 25/02/2012

(Annex: C)

10

No	Name of Forester	Name	Domicile	Qualification	Trained/un-trained	Any training passed	Date of birth	Date of entry into Govt. service	Date of present grade as Forester	Name of Division where presently working	Remarks
1	2	3	4	5	6	7	8	9	10	11	12
I. Deputy Ranger on ret.											
1	Mr. Muhammad Iqbal	Mr. Muhammad Iqbal	Mansehra	MA	Trained		19.08.1954	26.08.1978	25.03.1978	Kunhar	Appointed as Deputy Ranger on charge basis w.a.f. 18/12/2009 vide CP A.Abid Circle office order No. 91 dated 18/12/2009
2	Mr. Sultan Mehmood	Mr. Sultan Mehmood	Mansehra	BA			08.04.1958	26.09.1978	26.08.1978	Daur	Appointed as Deputy Ranger on charge basis w.a.f. 18/12/2009 vide CP A.Abid Circle office order No. 91 dated 18/12/2009
3	Mr. Muhammad Hanif	Mr. Muhammad Hanif	Mansehra	MA			01.02.1955	28.08.1978	28.08.1978	Unhar	Appointed as Deputy Ranger on charge basis w.a.f. 18/12/2009 vide CP A.Abid Circle office order No. 91 dated 18/12/2009
4	Mr. Zarin Gul	Mr. Zarin Gul	Buner	BA			01.04.1954	18.03.1985	18.03.1985	Buner	Appointed as Deputy Ranger on charge basis w.a.f. 18/12/2009 vide CP A.Abid Circle office order No. 91 dated 18/12/2009
5	Mr. Gul Zaman	Mr. Gul Zaman	Mansehra	Matric			19.01.1959	21.04.1979	21.09.1992	Unhar	Appointed as Deputy Ranger on charge basis w.a.f. 25/4/2008 vide CP A.Abid Circle office order No. 92 dated 25/4/2008 (for merit event)
II. Foresters in PBS-9											
1	Mr. Shabir Ahmed	Mr. Shabir Ahmed	Mansehra	FA							
2	Mr. Taj Muhammad	Mr. Taj Muhammad	Abbottabad	Matric		Attended 3rd up-gradation course	28-04-1950	13-09-1978	13-09-1978	Unhar	BPS-9 (11.05.1998)
3	Mr. Muhammad Nazir	Mr. Muhammad Nazir	Mansehra	Matric		Attended 3rd up-gradation course	19-09-1955	05-04-1976	20-02-1979	Daur	BPS-9 (11.05.1998)
4	Mr. Khurshid Khan	Mr. Khurshid Khan	Abbottabad	Matric		Attended 3rd up-gradation course	05-02-1961	27-05-1979	27-05-1979	Kunhar	BPS-9 (22.06.2010)
5	Mr. Niamatullah	Mr. Niamatullah	Shangla	Matric			02-12-1963	05-12-1981	05-12-1981	Daur	BPS-9 (22.06.2010)
6	Mr. Shauhat Ali	Mr. Shauhat Ali	Mansehra	BA		Attended 5th up-gradation course	12-02-1954	01-01-1983	01-01-1983	Kohistan	BPS-9 (22.06.2010)
7	Mr. Haider Zaman	Mr. Haider Zaman	Abbottabad	Matric		Attended 12th up-gradation course	10-02-1953	01-11-1983	01-11-1983	Kohistan	BPS-9 (22.06.2010)
8	Mr. Abdul Razaq	Mr. Abdul Razaq	Shangla	Matric			12-01-1953	30-06-1974	01-09-1984	Daur	BPS-9 (22.06.2010)
9	Mr. Gul Rehman	Mr. Gul Rehman	Buner	B.Sc Forestry			05-06-1953	05-01-1985	06-01-1985	Kohistan	BPS-9 (22.06.2010)
10	Mr. Hazrat Rehman	Mr. Hazrat Rehman	Buner	Matric	Un-trained	Attended 5th up-gradation course	01-01-1953	13-03-1985	13-03-1985	Buner	BPS-9 (22.06.2010)
11	Mr. Muhammad Shamraz	Mr. Muhammad Shamraz	Abbottabad	O.Com	Trained	Attended 1st up-gradation course	04-04-1957	03-07-1982	17-10-1992	Buner	BPS-9 (22.06.2010)
12	Mr. Mushtaq Ahmed	Mr. Mushtaq Ahmed		Under Matric	Passed FS course		12-12-1972	22-10-1991	01-11-1992	Kunhar	BPS-9 (22.06.2010)
13	Mr. Mukhtar Alam	Mr. Mukhtar Alam		Under Matric			10-04-1954	01-04-1976	15-07-2002		(Contractual employees)
14	Mr. Afzal Ali	Mr. Afzal Ali	Banagram	BA			20-01-1958	05-04-1977	15-07-2002	Daur	BPS-9 (22.06.2010)
15	Mr. Muhammad Manzoor	Mr. Muhammad Manzoor	Mansehra	Matric			01-01-1958	09-02-1977	10-07-2004	Unhar	BPS-9 (22.06.2010)
16	Syed Noor Habib Shah	Syed Noor Habib Shah	Banagram	Under Matric			13-08-1952	12-03-1977	23-11-2007	Kunhar	BPS-9 (22.06.2010)
17	Mr. Sar Zameen	Mr. Sar Zameen	Buner	Matric			02-01-1955	21-02-1977	23-03-2011	Unhar	BPS-9 (23.03.2011)
							30-11-1958	13-02-1985	17-09-2011	Buner	BPS-9 (17-09-2011)

Project Director
Watershed Management Project
Abbottabad

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Annexure B

TENTATIVE SENIORITY LIST OF DEPUTY RANGERS/FORESTERS WHO ARE APPOINTEE OF WATERSHED MANAGEMENT CIRCLE ABBOTTABAD
 PREPARED IN PURSUANCE OF ADMINISTRATIVE DEPARTMENT NOTIFICATION NO.50/ESTT/ENVY/1/2011/1623-50, DATED 8-10-2012.
 (As Revised on 31-10-2012)

Sl. No.	Name of Deputy Ranger/Forester	Qualification	Home District	Any test passed	Date of Birth	Date of appointment		Cadre	Present place of posting	Remarks
						Govt. Service	Present Grade			
1	Sarraz Khan	Matric	Hariapur	Trained	1/5/1954	11/11/1975	28/04/2008	Daur Watershed Division	Upper Hazara Circle	Forest Ranger charge
2	Masood-ur-Rehman	Matric	Mansehra	Trained	20/6/1954	26/10/1977	28/04/2008	Watershed Circle	Lower Hazara Circle	
3	Zereen Gul	B.A	Bunair	Trained	1/4/1954	18/3/1985	18/12/2009	Bunair Watershed Division	Watershed Circle	
4	Sultan Mahmood	B.A	Mansehra	Trained	8/4/1958	26/8/1978	18/12/2009	Watershed Circle	Upper Hazara Circle	
5	Shabir Ahmed	F.A	Mansehra	Trained	28/4/1960	13/9/1978	13/09/1978	Daur Watershed Division	Lower Hazara Circle	Forest
6	Muhammad Nazir	Matric	Mansehra	Trained	5/2/1961	27/5/1979	27/05/1979	Sinn Watershed Mansehra	Watershed Circle	-d
7	Muhammad Iqbal	Matric	Mansehra	Trained	1/4/1953	12/11/1975	01/11/1951	Daur Watershed Division	Lower Hazara Circle	-d
8	Muhammad Sharif	Matric	Mansehra	Trained	15/1/1956	1/6/1976	01/11/1981	Unhar Watershed Division	Upper Hazara Circle	-d
9	Abid Hussain	B.A	Mansehra	Trained	15/4/1951	23/11/1981	23/11/1981	Kunhar Watershed Division	Lower Hazara Circle	-d
10	Gulraz-Il	Matric	Shangla	Trained	11/10/1954	1/1/1983	01/01/1983	Kohistan Watershed Division	Upper Hazara Circle	-d
11	Niamat Ullah	Matric	Shangla	Trained	12/2/1954	1/1/1983	01/01/1983	Kohistan Watershed Division	Watershed Circle	-d
12	Shujat Ali	B.A	Shangla	Trained	10/2/1953	1/11/1953	01/11/1983	Kohistan Watershed Division	Watershed Circle	-d
13	Abdul Razzaq	Matric	Shangla	Trained	6/6/1953	6/1/1985	05/01/1985	Kohistan Watershed Division	Watershed Circle	-d
14	Gul Rehman	BSc Forestry	Bunair	Trained	1/1/1965	13/3/1985	13/03/1985	Bunair Watershed Division	Watershed Circle	-d
15	Haider Zaman	Matric	Abbottabad	Trained	12/1/1953	30/6/1974	11/08/1985	Daur Watershed Division	Watershed Circle	-d
16	Muhammad Sharvez	D.Com	Abbottabad	Trained	12/12/1972	22/10/1991	22/10/1991	Saka Nullah Project	Watershed Circle	-d
17	Kamran Khan	BSc Forestry	Abbottabad	Trained	1/5/1970	1/10/1992	01/10/1992	Hazara Social Forestry	Lower Hazara Circle	-d
18	Hazrat Rehman	Matric	Bunair	Trained	4/4/1957	3/7/1982	17/10/1992	Bunair Watershed Division	Watershed Circle	-d
19	Mushtaq Ahmed	Under Matric	Abbottabad	Trained	10/4/1954	1/4/1976	15/12/2002	Daur Watershed Division	Watershed Circle	-d
20	Mukhtiar Alam	Under Matric	Abbottabad	Trained	20/1/1958	6/4/1977	15/12/2002	Daur Watershed Division	Watershed Circle	-d
21	Atzal Ali	B.A	Balagram	Un trained	1/1/1958	2/9/1977	22/06/2010	Unhar Watershed Division	Watershed Circle	-d
22	Syed Noor Habib Shah	Middle	Balagram	Un trained	2/1/1955	21/2/1977	26/03/2011	Unhar Watershed Division	Watershed Circle	-d
23	Sar Zameen	Matric	Bunair	Un trained	23/11/1958	13/2/1985	17/09/2011	Bunair Watershed Division	Watershed Circle	-d
24	Ijazat Ali	Matric	Mansehra	Un trained	24/5/1956	22/8/1977	14/01/2012	Kunhar Watershed Division	Lower Hazara Circle	-d

Conservator of Forests/PD
 Watershed Management Circle
 Abbottabad

Received stamp - 8/2013

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BEFORE THE KHYBER PAKHTUNKHWA,

OFFICE ORDER NO. 12 DATED ABBOTTABAD THE 08/10/2013
BY SHER MUHAMMAD CONSERVATOR OF FORESTS LOWER HAZARA FOREST
CIRCLE ABBOTTABAD

As recommended by Departmental Promotion Committee in its meeting held on 30-09-2013 under the Chairmanship of Chief Conservator of Forests, Central Southern Forest Region-I Khyber Pakhtunkhwa, Peshawar the following Foresters already promoted to the rank of Deputy Rangers on acting charge basis in BPS-11 vide this office orders as noted against each are hereby regularized as Deputy Rangers in BPS-11 (Rs: 6600-460-20400) with immediate effect against the existing vacancies of Deputy Rangers in Lower Hazara Forest Circle, Abbottabad:

S.#	Name of Deputy Ranger	Office order No. and date through which they are promoted on acting charge basis
1.	Muhammad Farooq	Office order No. 90, dated 28-04-2008
2.	Mr. Gul Zaman	-do-
3.	Muhammad Hanif	Office order No. 91, dated 18-12-2009

They will continue their duties at the present place of postings.

This order is purely temporary and will not constitute any right for continuity in case of abolition of the post. In such an eventuality they will automatically stand reverted to original post without any notice.

They will remain on probation for a period of one year in terms of Section-6 (2) of the Khyber Pakhtunkhwa Civil Servants Act, 1973, read with Rules-15 (1) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.

Sher Muhammad
Conservator of Forests
Lower Hazara Forest Circle
Abbottabad

Memo.

Copy forwarded to the:

- 1- Chief Conservator of Forests, Central Southern Forest Region-I Khyber Pakhtunkhwa Peshawar for favour of information please.
- 2- Chief Conservator of Forests, Northern Forest Region-II Abbottabad for favour of information please.
- 3- Conservator of Forests, Upper Hazara Forest Circle, Mansehra.
- 4- Conservator of Forests, Watershed Management Circle, Abbottabad.
- 5- Divisional Forest Officer Kaghan Forest Division, Garhi Habibullah.
- 6- Divisional Forest Officer Agror Tanawal Forest Division, Mansehra.
- 7- Divisional Forest Officer Lower Watershed Division, Mansehra.
- 8- All concerned

For information and necessary action.

Muhammad Hanif c/o Dfo Kaghan
[Signature]
Conservator of Forests
Lower Hazara Forest Circle
Abbottabad.

G.E.
Ceb.
24/10

To

The Chief Conservator of Forests,
Central Southern Forest Region-I
Peshawar

Through

Proper channel

Subject:

CONFIRMATION OF DEPUTY RANGER APPEAL FOR SENIORITY.

Dear Sir,

It is submitted that the appellant was appointed as Forester in Watershed Management Project on 26/08/1978. According to the combined seniority list stood on 31/12/2011 circulated by Conservator of Forests, Lower Hazara Forest Circle Abbottabad vide letter No. 1409-11/GE, dated 23/02/2012 duly endorsed by the Project Director/CF Watershed Circle No. 2541-43/E-48, dated 29/03/2012 and DFO endorsement No. 1160/PWS, dated 05/03/2012 the name of the appellant was shown at serial No. 6 (copy attached as annexure-I).

The seniority list as stood on 29/02/2012 circulated by the Project Director/CF, Watershed Management Project Abbottabad vide endorsement No. 2704-11/E-48 dated 12/03/2012, the name of the appellant was shown at serial No. 2 Copy attached as annexure-II. Same seniority list as stood on 29/02/2012 again revised due to unknown reason was circulated by the Project Director/CF, Watershed Management Project received by the appellant during 06/2013 wherein the name of the appellant is placed at serial No. 4. Copy is attached as annexure-III, whereas one junior Deputy Ranger namely Zareen Gul put at serial No. 3 which is against the rules according to my date of appointment/promotion:

In this connection, it is pointed out that Mr. Zareen Gul Deputy Ranger who is most junior from the appellant was promoted to the rank of Deputy Ranger on merit quota and after that in all the previous seniority list Mr. Zareen Gul was junior from the appellant certainly he put at serial No. 3 and now he shown senior from the appellant which is injustice as the appellant was promoted to the rank of Deputy Ranger vide Conservator of Forests, Hazara Forest circle, Abbottabad office order No. 91 dated 18/12/2009 at that time Zareen Gul was at serial No. 5 and he was two step junior from the seniority of the appellant.

It is also pointed out that as per date of appointment, date of birth and date of promotion the appellant is senior from Mr. Zareen Gul Deputy Ranger. In this regard the appellant already preferred an appeal before your goodself but no justice have been received. As per section 8 of civil servant Act, 1973 the seniority will have be



determined on the basis of length of service, thus the appellant is entitled for seniority.

But now The Conservator of Forests/PD Watershed Management Circle Abbottabad issue order No.12 dated 8/10/2013 and regularized the service of Two Deputy Ranger i.e M/S Masood-ur-Rehman and Zareen Gul and committee again ignored the appellant which seem to clear violation of the rule. The honorable Service Tribunal KPK Peshwar already announced judgment dated 10.1.2012 in case title Shabbir Ahmed Forester VS Govt. regarding promotion against 25% quota copy of the same enclosed as annexure-III.

In view of the aforesaid facts, it is humbly prayed that the case of the appellant may be reviewed and correct the impugned seniority list and regularized the service of the appellant and also promoted the rank of Forest Ranger keeping in view the long service please.

Dated:- 28-10-2013

Your Obediently

Sultan Mehmood
Sultan Mehmood

Deputy Ranger Incharge
Garhi Habibullah Forest
Range Kaghan Forest
Division.

Copy in advance to:

- 1) - Chief Conservator of Forests, Central Southern Forest Region-I
Khyber Pakhtunkhwa, Peshawar.
 - 2) - Project Director/Conservator of Forests, Watershed Management
Project, Abbottabad
- For favour of information and necessary action please.

Dated:- 28-10-2013

Your Obediently

Sultan Mehmood
Sultan Mehmood

Deputy Ranger Incharge
Garhi Habibullah Forest
Range Kaghan Forest
Division.

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15

CH

OFFICE OF THE CHIEF CONSERVATOR OF FORESTS GENERAL SOUTH-WEST FORESTS REGION, KHYBER PAKHTUNKHWA PESHAWAR.

(Amended)

(15)

The Chief Conservator of Forests Northern Forest Region-II Abbottabad.

No. 5277/E, dated Peshawar the 3/1/2014.

Subject: CONFIRMATION OF DEPUTY RANGER APPEAL FOR SENIORITY.

Memorandum: Reference your letter No. 4448/E, dated 23.12.2013.

As recommended by your vide letter cited above, the appeal of Mr. Sultan Mahmood D/Ranger on acting charge basis is hereby rejected.

No reasons has been given

It is therefore requested to inform the applicant accordingly.

CHIEF CONSERVATOR OF FORESTS GENERAL SOUTH-WEST FORESTS REGION KHYBER PAKHTUNKHWA PESHAWAR.

Handwritten signature and initials

Office of Conservator of Forests Receipt No. 1680 Date 16-01-14

Office stamp: Duly No. 3134 Date 15-1-14

No. 5277/E, Dated Abbottabad the 15/1/2014.

Copy in continuation of this office endorsement No. 4449/E, dated 23.12.2013 forwarded to the Conservator of Forests Watershed Management Circle, Abbottabad for information and necessary action.

Chief Conservator of Forests Northern Forest Region-II Abbottabad Khyber Pakhtunkhwa

Handwritten initials and signature

Received on 23-02-2014. Handwritten signature and date

25 "I"

(Amended)

(REGULATION WING)
Dated Peshawar, the 16th, February, 2010



NOTIFICATION

No. SOR-VI (E&AD) 1-3/2009/Vol-VIII: - In exercise of the powers conferred by Section 26 of the North-West-Frontier Province Civil Servants Act, 1973 (N.W.F.P. Act No. XVIII of 1973), read with this Department's Notification No. SOR-I(S&GAD) 1-206/74/Vol. V, dated 18th April 1989, the Chief Minister of the North-West-Frontier Province is pleased to direct that in the North-West-Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules 1989, the following further amendment shall be made, namely:

AMENDMENT

For rule 15, the following shall be substituted, namely:

- 15. Probation. - (1) Persons appointed to posts by initial recruitment, promotion or transfer shall be on probation for a period of one year.
- (2) The appointing authority, if considers necessary, may extend probation period for one year as may be specified at the time of appointment.
- (3) On the successful completion of probation period, the appointing authority shall, by specific order, terminate the probation:

Provided that if no specific order is issued on the expiry of the first year of probation period, the period of probation shall be deemed to have been extended under sub-rule (2):

Provided further that if no specific order is issued on the expiry of the extended period of probation, the period of probation shall be deemed to have been successfully completed.

CHIEF SECRETARY
GOVERNMENT OF NWFP

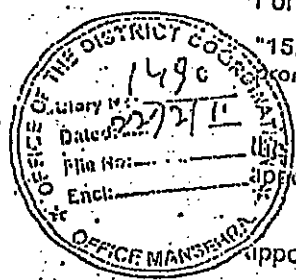
Encl: No. and dated even.

Copy forwarded to:-

1. Additional Chief Secretary, Govt of NWFP, Planning & Development Department.
2. Additional Chief Secretary (FATA), FATA Secretariat Peshawar.
3. Additional Chief Secretary, Govt of NWFP Home & Tribal Affairs Department.
4. The Senior Member, Board of Revenue, NWFP.
5. All Administrative Secretaries to Govt. of NWFP.
6. The Secretary to Governor, NWFP.
7. The Principal Secretary to Chief Minister, NWFP.
8. All Divisional Commissioners in NWFP.
9. All Heads of Attached Departments in NWFP.
10. All District Coordination Officers in NWFP and Political Agents in FATA.
11. The Registrar Peshawar High Court, Peshawar.
12. The Registrar, NWFP Service Tribunal, Peshawar.
13. The Secretary, NWFP Public Service Commission, Peshawar.
14. All Additional Secretaries, Deputy Secretaries and Section Officers in Establishment & Administration Department.

(KALEEMULLAH)
SECTION OFFICER (REG: VI)

D Com
19/2/10



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 351 / of 2014

Sultan Mehmood, Acting Deputy Ranger

Appellant

VERSUS

Province of Khyber Pakhtunkhwa and others... ..

Respondents

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5.	Confirmation order of Muhammad Hanif	'D'	12
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7.	Final Order	'F'	15
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9.	Vakalat Nama		

Sultan Mehmood

Appellant

Through:

(Signature)

Dated: 13.03.2014

(Shahzada Irfan Zia)
Advocate, Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No.

351 / of 2014

Sultan Mehmood, Acting Deputy Ranger,
Garhi Habib Ullah Forest Range,
Kaghan Forest Division, Garhi Habib Ullah...

388
14-3-2014

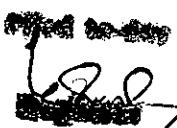
Appellant

VERSUS

1. Province of Khyber Pakhtunkhwa through Secretary Environment Department, Peshawar.
2. Chief Conservator of Forests, Central Southern Forests Region, Khyber Pakhtunkhwa, Peshawar.
3. Chief Conservator of Forests, Northern Forest Region-II, Abbottabad.
4. Conservator of Forest/Project Director, Watershed Management Circle, Abbottabad...

Respondents

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED FINAL ORDER DATED 03.1.2014 RECEIVED/COMMUNICATED TO THE APPELLANT ON 23.2.2014, WHEREBY HIS DEPARTMENTAL APPEAL FOR CONFIRMATION AS DEPUTY RANGER HAS BEEN REJECTED BY RESPONDENT NO.2, WITHOUT ANY REASON DISREGARD OF THE RULES.


14/3/14
Respectfully Sheweth:

FACTS OF THE CASE

1. That the appellant is a regular member of Provincial Civil Service of Forest Department and presently serving as Deputy Ranger on Acting Charge Basis.
2. That on 18.12.2009 the appellant alongwith others was promoted as Deputy Ranger in BPS-9 on Acting Charge Basis on the

recommendations of Departmental Promotion Committee. (Annex: A).

3. That the appellant completed his probation period successfully to the entire satisfaction of his superiors and no cause of complaint was ever reported against him.
4. That the appellant is entitled for confirmation against the post of Deputy Ranger, but due to lukewarm procedure of the department, he has not been confirmed against the post of Deputy Ranger and still he is performing his statutory duties as Acting Deputy Ranger since long.
5. That it is astonishing that the department adopted the policy of pick and choose and passed the confirmation order of one Mr. Muhammad Hanif (Deputy Ranger) who is far junior to the appellant. According to the seniority lists circulated from time to time, it is crystal clear that Mr. Muhammad Hanif is junior to appellant and both were promoted as Deputy Range on Acting Charge Basis in the same order dated 18.12.2009, but the appellant has been ignored while his junior colleague Mr. Muhammad Hanif was confirmed against the post of Deputy Ranger, thus the conduct of respondents is not above board rather discriminatory and against the principles of seniority. (Annex: B, C & D).
6. That feeling aggrieved the appellant filed his departmental appeal for confirmation/regularization against the post of Deputy Ranger dated 28.10.2013, but to his utter dismay that his departmental appeal has been rejected by respondent No.2 vide order dated 03.1.2014 communicated/received by the appellant on 23.2.2014. (Annex: E & F).
7. That as per rules persons appointed to posts by initial recruitment, promotion or transfer shall be on probation for a period of one year. The appointing authority, if considers necessary may extend the probation period for one year as may be specified at the time of

appointment. If no order is issued on the expiry of the extended period of probation, the period of probation shall be deemed to have been successfully completed. The appellant has already completed his probation period successfully and there existed nothing against him and it is the apathy and negligence of the department that they failed to pass the confirmation order of the appellant and the appellant is not supposed to suffer for inaction or omission of the department. (Annex: G).

8. That clear vacancies were available against which the appellant could be confirmed as it is evident that Mr. Muhammad Hanif who was junior to appellant, but he has already been confirmed, while the same benefit is being denied to the appellant and he has not been treated in accordance with law.

In view of the aforesaid facts and circumstances of the case it is humbly prayed that the impugned order dated 03.1.2014 received/communicated to the appellant on 23.2.2014 may kindly be set aside, being illegal and void, directing the respondents to issue/pass *Regularization* confirmation order of the appellant against the post of Deputy Ranger from the date when his juniors were confirmed against the said post.

Any other relief though not specifically asked for to which the appellant is found entitled in the circumstances of the case may also be granted to the appellant.

Sultan Mahmood
Appellant

Through:

Dated: 13.03.2014

(Shahzada Irfan Zia)
Advocate, Peshawar.

CERTIFICATE:

Certified that as per instructions of my client, no Service Appeal on behalf of the appellant has earlier been filed in this Honorable Tribunal on the subject matter.

Advocate. *(Shahzada Irfan Zia)*

(Annex: A) 5

(4)

OFFICE ORDER No. 911 DATED ABBOTTABAD THE 18/12/2009 BY
**SYED KHURSHID ANWAR, CONSERVATOR OF FORESTS, ABBOTTABAD FOREST
 CIRCLE, ABBOTTABAD**

As recommended by Departmental Promotion Committee in its meeting held on 24-11-2009 under the Chairmanship of Chief Conservator of Forests, NWFP, Peshawar, the following Foresters are hereby appointed as Deputy Ranger in BPS-09 (Rs. 3820-230-10720) with immediate effect on acting charge basis against the existing vacancies of Deputy Rangers in District Government:

S.#	Name of Forester	Present posting
1.	Mr. Sultan Khan S/O Umer Khan	Upper Kohistan Forest Division, DASSU
2.	Mr. Muhammad Iqbal S/O Gohar Rehman	Kunhar Watershed Division, Manshra
3.	Mr. Sultan Mehnood S/O Fida Muhammad	Unhar Watershed Division, Manshra
4.	Mr. Muhammad Hanif S/O Muhammad Qasim	Kaghan Forest Divn., Garhi Habibullah
5.	Mr. Zarin Gul S/O Said Kamal Shah (against merit quota)	Bunair Watershed Division, Swari

This order is purely temporary and will not confer any right for continuity on abolition of the posts and the official will be liable to reversion to original post without any notice.

The Deputy Rangers will be on probation for a period of one year in terms of section 6(2) of the NWFP Civil Servant ACT, 1973 read with rule 15(1) of the NWFP Civil Servant (Appointment, Promotion and Transfers) Rules, 1989.

Further posting order of above Deputy Rangers are being issued separately.

Sd/- Syed Khurshid Anwar,
 Conservator of Forests,
 Abbottabad Forest Circle,
 Abbottabad.

Memo.

Copy forwarded to:

- 1- The Chief Conservator of Forests, NWFP, Peshawar for favour of information with reference to his letter No. 2406-7/E, dated 05-12-2009 and No. 2491/E, dated 10-12-2009.
- 2- The Project Director/Ce, Watershed Management Project, Abbottabad for information and necessary action.
- 3- The Conservator of Forests, Upper Hazara Forest Circle, Manshra for information.
- 4- The Divisional Forest Officer, Upper Kohistan Forest Division, DASSU.
- 5- The Divisional Forest Officer, Kunhar Watershed Division, Manshra.
- 6- The Divisional Forest Officer, Unhar Watershed Division, Manshra.
- 7- The Divisional Forest Officer, Bunair Watershed Division, Swari.
- 8- The Divisional Forest Officer, Kaghan Forest Division, Garhi Habibullah.
- 9- The Executive District Officers (Agriculture)
 - Manshra.
 - Kohistan.
 - Hacıpur.
 - Abbottabad.

For information and necessary action.
 All concerned for information and necessary action.

Conservator of Forests,
 Abbottabad Circle,
 Abbottabad

attested
 18/12

EC
Copy of memo
21/12/09
Copy of memo
for info

INTEGRATED SENIORITY LIST OF FORESTERS COMPRISING OF ABBOTTABAD CIRCLE AND WATERBURY AS IT STOOD ON 31-03-2009

(Annex B) 5

S. #	Name of Forester	Qualification	Home District	Any test passed	Date of Birth	Date of appointment in Govt. Service	Present grade	Cadre	remarks
1	Mr. Muhammad Iqbal S/O Jahan	Matric	Abbottabad	Trained	20-06-1953	15-06-1977	15-06-1977	-do-	Appointed as Deputy Ranger on acting charge basis w.e.f 28-04-2008
2	Mr. Manzoor Ahmad								
3	Syed Mubeen Shah				12-03-1959	24-06-1977	24-06-1977	-do-	
4	Mr. Sarfraz Khan S/O Muhammad Ashraf	Matric	Abbottabad	-do-	08-08-1950	19-06-1974	02-08-1977	W/Shed Circle	-do-
5	Mr. Javed Sultan	B.A	Haripur	-do-	01-05-1954	11-11-1973	02-03-1977	-do-	-do-
6	Mr. Masood-ur-Rehman S/O Jamadali	Matric	Abbottabad	-do-	01-06-1952	10-08-1977	10-08-1977	-do-	-do-
7	Mr. Muhammad Farooq	B.A	Mansehra	-do-	20-06-1954	26-10-1977	26-10-1977	-do-	BS-09,11-05-1998
8	Mr. Sultan Khan	D.Com	Mansehra	-do-	02-07-1956	19-08-1978	19-08-1978	A'Abad Circle	Appointed as Deputy Ranger on acting charge basis w.e.f 28-04-2008
9	Mr. Muhammad Maqbool				02-06-1951	31-03-1973	21-08-1978	-do-	Appointed as Deputy Ranger on acting charge basis w.e.f 28-04-2008
10	Mr. Muhammad Iqbal S/O Gohar Rehman	Matric	Abbottabad	-do-	10-04-1960	21-08-1978	21-08-1978	-do-	BS-09, 21-06-1994
11	Mr. Sultan Mahmood	M.A	Mansehra	-do-	19-06-1954	22-08-1978	22-08-1978	-do-	BS-09, 01-06-1994
12	Mr. Muhammad Hanif	B.A	Mansehra	-do-	08-04-1958	26-08-1978	26-08-1978	W/Shed Circle	BS-09, 11-05-1998
13	Mr. Shabir Ahmad	M.A	Mansehra	-do-	01-02-1955	26-08-1978	26-08-1978	-do-	BS-09, 01-06-1994
14	Mr. Taj Muhammad	F.A	Mansehra	-do-	01-02-1955	28-08-1978	28-08-1978	-do-	BS-09, 01-06-1994
15	Mr. Muhammad Pervaz	Matric	Abbottabad	-do-	28-04-1960	13-09-1978	13-09-1978	A'Abad Circle	BS-09, 01-06-1994
16	Mr. Muhammad Nazir	Matric	Mansehra	-do-	19-09-1955	06-04-1976	20-02-1979	W/Shed Circle	BS-09, 11-05-1998
17	Mr. Muhammad Tariq	Matric	Mansehra	-do-	03-04-1959	03-03-1979	03-03-1979	A'Abad Circle	BS-09, 11-05-1998
18	Mr. Nisar Ahmad S/O Sanaulah Khan	Matric	Mansehra	-do-	15-02-1961	27-05-1979	27-05-1979	-do-	BS-09, 02-12-1997
19	Mr. Muhammad Mumtaz	M.A	Mansehra	-do-	01-12-1957	17-09-1979	17-09-1979	W/Shed Circle	-do-
20	Mr. Muhammad Gulam	B.A	Mansehra	-do-	11-05-1959	18-09-1979	18-09-1979	A'Abad Circle	BS-09, 25-09-1997
21	Mr. Nisar Ahmad S/O Muhammad Raza	Matric	Mansehra	-do-	01-01-1959	22-09-1979	22-09-1979	-do-	BS-09, 25-09-1997
22	Mr. Tariq J.	F.A	Mansehra	-do-	24-03-1959	22-09-1979	22-09-1979	-do-	BS-09, 25-09-1997
23	Mr. Gulfray S/O Mayoor	Matric	Abbottabad	-do-	06-04-1961	24-03-1981	24-03-1981	-do-	BS-07
24	Mr. Rustam Khan	B.A	Kaistan	-do-	18-04-1956	06-06-1981	06-06-1981	-do-	BS-07
25	Mr. Muhammad Asghar	F.A	Kaistan	-do-	04-01-1957	27-09-1981	27-09-1981	-do-	BS-07
26	Mr. Muhammad Iqbal S/O Haji Muhammad Younis	Matric	Battagram	-do-	01-03-1959	27-09-1981	27-09-1981	-do-	BS-07
					01-04-1953	12-11-1975	01-11-1981	-do-	BS-07

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1	2	3	4	5	6	7	8	9	10
27	Mr. Muhammad Sharif	Matric	Mansehra	Trained	15-01-1956	01-06-1976	01-11-1981	-do-	BS-07
28	Mr. Abid Hussain	B.A	Mansehra	-do-	15-04-1961	23-11-1981	23-11-1981	-do-	BS-07
29	Mr. Khurshid Khan	Matric	Abbottabad	-do-	02-12-1963	05-12-1981	05-12-1981	-do-	BS-07
30	Mr. Naimatullah	Matric	Swat	-do-	12-02-1954	01-01-1983	01-01-1983	W/Shed Circle	BS-07
31	Mr. Gulfraz S/O Amzar	Matric	Swat	-do-	11-10-1954	01-01-1983	01-01-1983	-do-	BS-07
32	Mr. Muhammad Zahir Khan	Matric	Swat	-do-	01-01-1958	01-01-1983	01-01-1983	-do-	BS-07
33	Mr. Muhammad Rageen	Matric	Battagram	-do-	15-05-1956	01-03-1983	01-03-1983	A'Abad Circle	Appointed as Deputy Ranger on acting charge basis w.e.f 28-04-2008
34	Mr. Abdül Rashid S/O Safiullah	Matric	Haripur	-do-	15-07-1952	07-05-1973	28-05-1983	W/Shed Circle	BS-07
35	Mr. Shah-e-Room	Matric	Battagram	-do-	03-01-1955	19-03-1975	01-10-1983	W/Plan Circle	BS-09,18-04-1987
36	Syed Wahab Shah	Matric	Battagram	-do-	18-05-1959	23-01-1979	01-10-1983	A'Abad	BS-07
37	Mr. Jamdad Khan	Matric	Kohistan	-do-	18-01-1957	01-10-1983	01-10-1983	-do-	BS-07
38	Mr. Muhammad Shafiqat	B.A	Haripur	-do-	01-01-1950	01-10-1983	01-10-1983	W/Plan Circle	BS-07
39	Mr. Iltaf Quareshi	Matric	Kohistan	-do-	05-03-1961	01-10-1983	01-10-1983	A'Abad Circle	BS-07
40	Mr. Zia-ud-Din	Matric	Kohistan	-do-	06-09-1961	01-10-1983	01-10-1983	-do-	BS-07
41	Mr. Baqir Hussain Shah	F.A	Mansehra	-do-	15-03-1963	01-10-1983	01-10-1983	W/Plan Circle	BS-07
42	Mr. Anwar Khan	Matric	Kohistan	-do-	01-05-1965	01-10-1983	01-10-1983	A'Abad Circle	BS-07
43	Mr. Shaujaht Ali	B.A	Swat	-do-	10-02-1963	01-11-1983	01-11-1983	W/Shed Circle	BS-07
44	Mr. Haider Zaman	Matric	Abbottabad	-do-	12-01-1953	30-06-1974	01-09-1984	-do-	BS-07
45	Mr. Baidar Bakht	Matric	Mansehra	-do-	08-01-1953	15-01-1979	01-10-1984	-do-	BS-07
46	Mr. Muhammad Riazat S/O Mir Akbar	F.A	Abbottabad	-do-	15-06-1963	01-10-1984	01-10-1984	-do-	BS-07
47	Mr. Aurangzeb S/O Aziz-ur-Rehman	Matric	Mansehra	-do-	09-09-1960	02-06-1979	29-10-1984	-do-	BS-07
48	Mr. Abdul Razaq	Matric	Swat	-do-	06-06-1953	01-06-1985	06-01-1985	W/Shed Circle	BS-07
49	Mr. Said Amir Shah	M.A	Swat	-do-	02-02-1959	12-03-1985	12-03-1985	-do-	BS-07
50	Mr. Gul Rehman	B.Sc (Forestry)	Swat	-do-	01-01-1965	13-03-1985	13-03-1985	-do-	BS-07
51	Mr. Zarin Gul	B.A	Swat	-do-	01-04-1964	18-03-1985	18-03-1985	-do-	BS-07
52	Mr. Hazarat Shah	Middle	Abbottabad	-do-	15-10-1951	05-09-1975	05-08-1985	W/Shed Circle	BS-07
53	Mr. Aurangzeb S/O Allah Dad	Matric	Mansehra	-do-	21-09-1949	31-03-1975	30-09-1985	A'Abad Circle	BS-07
54	Mr. Muhammad Anwar S/O Muhammad Roshan	Matric	Mansehra	-do-	01-05-1958	27-08-1981	30-09-1985	A'Abad Circle	BS-07
55	Mr. Muhammad Jayed S/O Mohib-ur-Rehman	F.A	Mansehra	-do-	15-04-1963	30-09-1985	30-09-1985	-do-	BS-07
56	Mr. Riaz Muhammad	Matric	Mansehra	-do-	11-11-1952	26-08-1974	06-03-1986	-do-	BS-07

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1	2	3	4	5	6	7	8	9	10
57	Mr. Mukhtiar Shah	Matric	Mansehra	Trained	01-01-1952	31-03-1975	09-04-1986	-do-	BS-07
58	Mr. Siraj-ud-Din	B.A	Kohistan	-do-	25-09-1966	23-06-1986	23-06-1986	A'Abad Circle	BS-07
59	Mr. Muhammad Riasat S/O Qayyum	Matric	Abbottabad	-do-	25-03-1966	01-10-1986	01-10-1986	-do-	BS-07
60	Mr. Muhammad Anwar S/O Fazal-ur-Rehman	F.A	Abbottabad	-do-	15-02-1966	01-10-1986	01-10-1986	A'Abad Circle	BS-07
61	Mr. Tahir Hussain Shah	F.A	Mansehra	-do-	05-02-1963	23-11-1986	23-11-1986	-do-	BS-07
62	Sardar Mehmood	Matric	Mansehra	-do-	15-03-1954	03-05-1975	11-12-1986	-do-	BS-07
63	Mr. Ashiq Zaman	F.A	Swat	Un-trained	18-01-1951	11-10-1972	22-08-1988	W/Shed Circle	BS-07
64	Mr. Naeem Gohar	F.A	Abbottabad	-do-	14-12-1963	01-10-1988	01-10-1988	W/Plan Circle	BS-07
65	Mr. Bashir Ahmad	M.A	Mansehra	-do-	11-03-1965	01-10-1988	01-10-1988	-do-	BS-07
66	Mr. Amjad Khan	F.A	Mansehra	-do-	06-05-1968	01-10-1988	01-10-1988	-do-	BS-07
67	Mr. Muhammad Fiaz	Matric	Mansehra	-do-	10-03-1961	12-03-1979	28-09-1989	-do-	BS-07
68	Mr. Muhammad Javed S/O Ghulam Rabbani	B.A	Mansehra	-do-	10-05-1960	01-10-1989	01-10-1989	-do-	BS-07
69	Syed Ibrar Hussain Shah	Matric	Mansehra	-do-	12-02-1965	01-10-1989	01-10-1989	W/Plan Circle	BS-07
70	Mr. Sajid Khan	B.A	Abbottabad	-do-	13-06-1970	02-11-1989	02-11-1989	-do-	BS-07
71	Mr. Muhammad Asif	B.A	Abbottabad	-do-	17-11-1967	04-11-1989	04-11-1989	A'Abad Circle	BS-07
72	Mr. Mashal Khan	Matric	Mansehra	-do-	18-05-1952	28-05-1973	16-12-1989	-do-	BS-07
73	Mr. Mehmood	Matric	Abbottabad	Trained	01-01-1960	03-07-1980	26-12-1989	W/Shed Circle	BS-07
74	Mr. Muhammad Inqam	F.A	Haripur	-do-	05-05-1970	23-05-1990	23-05-1990	-do-	BS-07
75	Mr. Abdur Rashid	Matric	Abbottabad	-do-	07-01-1959	21-08-1977	01-07-1990	-do-	BS-07
76	Mr. Gul Zaman	Matric	Mansehra	-do-	19-01-1959	21-08-1979	21-09-1992	W/Shed Circle	Appointed as Deputy Engineer on acting charge basis w.e.f 23-04-2008
77	Mr. Zahoor Ahmad S/O Mir Ahmad	B.Sc	Abbottabad	-do-	25-04-1968	01-10-1992	01-10-1992	-do-	BS-07 (Contractual employee)
78	Mr. Kamran Khan	B.Sc (Forestry)	Abbottabad	-do-	01-05-1970	01-10-1992	01-10-1992		BS-07
79	Mr. Lakhan Khan	Matric	Swat	-do-	22-10-1949	02-07-1980	17-10-1992	W/Shed	BS-7
80	Mr. Hazarat Rehman	Matric	Swat	-do-	04-04-1957	03-07-1982	17-10-1992	-do-	BS-07
81	Mr. Kishwar Khan	Matric	Swat	-do-	17-12-1951	07-10-1984	17-10-1992	-do-	BS-07
82	Mr. Muhammad Shamraiz	D.Com	Abbottabad	-do-	12-12-1972	22-10-1991	01-11-1992	-do-	BS-07 Contractual employee
83	Mr. Muhammad Bashir S/O Arsala Khan	Matric	Mansehra	-do-	02-01-1957	20-11-1976	28-02-1993	-do-	BS-07

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	2	3	4	5	6	7	8	9	10
4	Mr. Phagual Khan	Matric	Battagram	Trained	01-02-1950	22-04-1974	12-09-1993	-do-	BS-07
5	Mr. Muhammad Yousaf	Matric	Battagram	-do-	17-04-1956	13-06-1975	08-05-1994	-do-	BS-07
6	Mr. Hussan-ul-Maab	Middle	Kohista	-do-	02-04-1950	12-10-1972	26-09-1994	-do-	BS-07
7	Mr. Umer Sharif	Matric	Battagram	-do-	01-10-1957	07-08-1979	01-06-1995	-do-	BS-07
8	Mr. Masood-ur-Rehman S/O Fazal-ur-Rehman	Matric	Mansehra	Trained	25-04-1960	27-04-1976	18-01-1997	W/Plan Circle	BS-07
9	Mr. Shad Muhammad	Matric	Mansehra	-do-	06-05-1956	28-04-1975	07-04-1997	-do-	BS-07
91	Mr. Saif-ul-Malook	Matric	Battagram	-do-	01-01-1956	17-05-1979	29-10-1997	-do-	BS-07
92	Syed Farooq Shah	Matric	Abbottabad	Trained	06-02-1956	17-11-1973	26-04-2002	-do-	BS-07
93	Mr. Muhammad Daud	Matric	Abbottabad	-do-	02-04-1953	26-07-1975	26-04-2002	-do-	BS-07
94	Mr. Mohib-ul-Haq	F.A	Battagram	-do-	13-06-1961	12-07-1979	27-04-2002	-do-	BS-07
95	Mr. Musitaq Ahmad	Under Matric	Abbottabad	-do-	10-04-1954	01-04-1976	15-07-2002	W/Shed Circle	BS-07
96	Mr. Mukhtiar Alam	Matric	Abbottabad	-do-	20-01-1958	06-04-1977	15-07-2002	-do-	BS-07
97	Syed Sultan Shah	Matric	Mansehra	-do-	03-07-1952	31-05-1975	16-07-2002	-do-	BS-07
98	Mr. Muhammad Sadiq	Matric	Abbottabad	Un-trained	15-03-1957	17-11-1975	16-07-2002	-do-	BS-07
99	Mr. Muhammad Iqbal S/O Mir Ahmad	Matric	Mansehra	Trained	05-07-1956	24-04-1976	16-07-2002	-do-	BS-07
100	Mr. Arif Hussain S/O Khushal Khan	Matric	Mansehra	Under training	16-06-1954	20-11-1976	16-07-2002	A'Abad Circle	BS-07
101	Mr. Afzal Ali	B.A	Battagram	Un-trained	01-01-1958	09-02-1977	10-07-2004	W/Shed Circle	BS-07
102	Mr. Raza Muhammad	Matric	Abbottabad	-do-	01-08-1966	09-01-1990	10-07-2004	A'Abad Circle	BS-07
103	Mr. Zulliqar Khan	Matric	Abbottabad	Trained	14-04-1959	14-02-1991	10-12-2004	-do-	BS-07
104	Mr. Jonas Khan	Matric	Kohistan	-do-	05-05-1952	19-05-1973	10-01-2005	-do-	BS-07
105	Mr. Masood-ur-Rehman	Matric	Abbottabad	Trained	10-10-1957	22-11-1975	11-02-2005	-do-	BS-07
106	Mr. Afrasiab	Matric	Abbottabad	-do-	01-01-1959	08-04-1976	11-02-2005	-do-	BS-07
107	Mr. Amraiz Khan	Matric	Abbottabad	-do-	10-06-1957	14-04-1976	11-02-2005	-do-	BS-07
108	Mr. Muhammad Ajab S/O Gulzar Ahmad	Matric	Abbottabad	-do-	11-04-1953	26-07-1975	15-02-2005	-do-	BS-07
109	Mr. Muhammad Ramzan	Matric	Abbottabad	-do-	21-09-1954	26-07-1975	15-02-2005	-do-	BS-07
110	Mr. Mian Khan	Matric	Abbottabad	-do-	08-06-1953	19-02-1976	15-02-2005	-do-	BS-07
111	Mr. Muhammad Yousaf S/O Sher Ahmad	Matric	Abbottabad	-do-	16-06-1952	24-03-1976	15-02-2005	-do-	BS-07
112	Mr. Summandar Khan	Under Matric	Mansehra	Un-trained	01-05-1952	12-03-1977	26-03-2006	Watershed Circle	BS-07
113	Mr. Muhammed Younis	Matric	Mansehra	Trained	15-04-1958	11-07-1975	12-04-2006	A'Abad Circle	BS-07
114	Mr. Iltaf Hussain	Matric	Mansehra	Un-Trained	12-05-1953	03-05-1976	12-04-2006	-do-	BS-07
115	Mr. Taj Muhammad	Matric	Mansehra	Trained	09-09-1958	20-11-1976	12-04-2006	-do-	BS-07

attested
[Signature]

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1	2	3	4	5	6	7	8	9	10
117	Mr. Ihtikhar	Matric	Abbottabad	Un-trained	30-09-1952	24-11-1976	19-08-2006	-do-	BS-07
118	Mr. Nisar Ahmad S/O-Khalil-ur-Rehman	B.Sc	Battagram	Un-trained	23-04-1975	21-03-2007	21-03-2007	A'Abad Circle	BS-07
119	Mr. Muhammad Faqir	Matric	Mansehra	Trained	06-04-1977	26-03-2007	26-03-2007	A'Abad Circle	BS-07
120	Mr. Bashir Ahmad S/O Aziz-ur-Rehman	Matric	Kohistan	Un-trained	02-04-1952	16-05-1973	23-05-2007	A'Abad Circle	BS-07
121	Mr. Muhammad Naseem	Matric	Abbottabad	Un-trained	10-07-1949	07-05-1974	26-05-2007	-do-	BS-07
122	Mr. Rustam Khan	Under Matric	Abbottabad	Un-trained	01-04-1956	10-07-1977	25-09-2007	-do-	BS-07
123	Mr. Muhammad Imtiaz	Matric	Abbottabad	Un-trained	15-09-1958	18-12-1976	27-09-2007	-do-	BS-07
124	Mr. Muhammad Manzoor	Matric	Haripur	Un-trained	20-04-1960	18-12-1976	27-09-2007	-do-	BS-07
125	Mr. Gul Naseem	F.Sc	Mansehra	Un-trained	13-08-1952	12-03-1977	23-11-2007	-do-	BS-07
126	Mr. Nazmeen Khan	F.A	Mansehra	Un-trained	02-04-1984	12-12-2007	12-12-2007	-do-	BS-07
127	Mr. Muhammad Farhad	F.Sc	Mansehra	Un-trained	20-03-1986	12-12-2007	12-12-2007	-do-	BS-07
128	Mr. Naseem Khan	F.Sc	Mansehra	Un-trained	04-04-1987	12-12-2007	12-12-2007	-do-	BS-07
129	Syed Ihtaf Hussain Shah	Matric	Mansehra	Under training	16-06-1987	12-12-2007	12-12-2007	-do-	BS-07
130	Mr. Uzair	Matric	Mansehra	Un-trained	21-06-1959	26-06-1977	18-01-2008	-do-	BS-07
131	Mr. Muhammad Saeed	Middle	Haripur	Un-trained	01-01-1988	20-03-2008	20-03-2008	-do-	BS-07
132	Mr. Wajid Ali Shah	Middle	Abbottabad	Un-trained	18-07-1952	21-12-1976	18-07-2008	-do-	BS-07
133	Mr. Khawaj Muhammad	Matric	Haripur	Un-trained	12-12-1953	28-12-1976	18-07-2008	-do-	BS-07
134	Mr. Muhammad Yousaf	Matric	Mansehra	Un-trained	12-12-1959	15-06-1977	04-09-2008	-do-	BS-07
135	Mr. Muhammad Faridoon	Matric	Mansehra	Un-trained	01-06-1955	01-07-1977	04-09-2008	-do-	BS-07
			Mansehra	Un-trained	12-10-1959	18-01-1980	04-09-2008	-do-	BS-07

attested
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Conservator of Forests,
Hazara Circle,
Abbottabad.
(T/Mir)

Statement Showing the Seniority List of Foresters in respect of Watershed Management Circle Abbottabad as it stood on 29/02/2012.

Sanctioned strength of Deputy Ranger 03
Sanctioned strength of Foresters 18

(Annex: C)

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#	Name of Forester	Father's Name	Domicile	Qualification	Trained/Un-trained	Any training passed	Date of birth	Date of 1st entry into Govt. service	Date of present grade as Forester	Name of Division where presently working	Remarks
I- Deputy Ranger on acting charge											
1	Mr. Munammad Iqbal	Mr. Gohar Rehman	Mansehra	MA	Trained		19.06.1954	26.08.1978	26.08.1978	Kunhar	Appointed as Deputy Ranger on acting charge basis w.e.f. 18/12/2009 vide CF A.Abad Circle office order No. 91 dated 18/12/2009.
2	Mr. Sultan Mehmood	Mr. Fida Muhammad	Mansehra	BA			08.04.1958	26.08.1978	26.08.1978	Daur	Appointed as Deputy Ranger on acting charge basis w.e.f. 18/12/2009 vide CF A.Abad Circle office order No. 91 dated 18/12/2009.
3	Mr. Muhammad Hanif	Mr. Muhammad Qasim	Mansehra	MA			01.02.1955	28.08.1978	28.08.1978	Unhar	Appointed as Deputy Ranger on acting charge basis w.e.f. 18/12/2009 vide CF A.Abad Circle office order No. 91 dated 18/12/2009.
4	Mr. Zarin Gul	Mr. Said Kamal Shah	Buner	BA			01.04.1964	18.03.1985	18.03.1985	Buner	Appointed as Deputy Ranger on acting charge basis w.e.f. 18/12/2009 vide CF A.Abad Circle office order No. 91 dated 18/12/2009.
5	Mr. Gul Zaman	Mr. Lal Din	Mansehra	Matric			19.01.1959	21.04.1979	21.09.1992	Unhar	Appointed as Deputy Ranger on acting charge basis w.e.f. 28/04/2008 vide CF A.Abad Circle office order No. 90 dated 28/04/2008. (on merit quota)
II- Foresters in PBS-9											
1	Mr. Shabir Ahmed	Mr. Gohar Aman	Mansehra	FA							
2	Mr. Taj Muhammad	Mr. Ali Gohar	Abbottabad	Matric		Attended 3rd up-gradation course	28-04-1960	13-09-1978	13-09-1978	Unhar	BPS-9 (11.05.1998)
3	Mr. Muhammad Nazir	Mr. Jumma Khan	Mansehra	Matric		Attended 3rd up-gradation course	19-09-1955	06-04-1976	20-02-1979	Daur	BPS-9 (11.05.1998)
4	Mr. Khurshid Khan	Mr. Adullah Khan	Abbottabad	Matric		Attended 3rd up-gradation course	05-02-1961	27-05-1979	27-05-1979	Kunhar	BPS-9 (22.06.2010)
5	Mr. Niamatullah	Mr. Charbagh	Shangla	Matric			02-12-1963	05-12-1981	05-12-1981	Daur	BPS-9 (22.06.2010)
6	Mr. Shauhat Ali	Mr. Abdul Rehman		BA			12-02-1954	01-01-1983	01-01-1983	Kohistan	BPS-9 (22.06.2010)
7	Mr. Haider Zaman	Mr. Sher Zaman	Abbottabad	Matric		Attended 5th up-gradation course	10-02-1963	01-11-1983	01-11-1983	Kohistan	BPS-9 (22.06.2010)
8	Mr. Abdul Razzaq	Mr. Malang Khan	Shangla	Matric		Attended 12th up-gradation course	12-01-1953	30-06-1974	01-09-1984	Daur	BPS-9 (22.06.2010)
9	Mr. Gul Rehman	Mr. Wahidullah	Buner	B.Sc Forestry			06-08-1953	06-01-1985	06-01-1985	Kohistan	BPS-9 (22.06.2010)
10	Mr. Hazrat Rehman	Mr. Abdul Rehman		Matric	Un-trained	Attended 5th up-gradation course	01-01-1955	13-03-1985	13-03-1985	Buner	BPS-9 (22.06.2010)
11	Mr. Muhammad Shamraiz	Mr. Allah Dad	Abbottabad	O.Com	Trained	Attended 1st up-gradation course	04-04-1957	03-07-1982	17-10-1992	Buner	BPS-9 (22.06.2010)
12	Mr. Mushtaq Ahmed	Mr. Abdul Rashid		Under Matric	Passed FG course		12-12-1972	22-10-1991	01-11-1992	Kunhar	BPS-9 (22.06.2010) (Contractual employee)
13	Mr. Mukhtiar Alam	Mr. Faridoo Khan		Under Matric			10-04-1954	01-04-1976	15-07-2002	Daur	BPS-9 (22.06.2010)
14	Mr. Afzal Ali	Mr. Sarwar Khan	Battagram	BA			20-01-1958	06-04-1977	15-07-2002	Daur	BPS-9 (22.06.2010)
15	Mr. Muhammad Manzoor	Mr. Muhammad Ahmed	Mansehra	Matric			01-01-1958	09-02-1977	10-07-2004	Unhar	BPS-9 (22.06.2010)
16	Syed Noor Habib Shah	Syed Farooq Shah	Battagram	Under Matric			13-08-1952	12-03-1977	23-11-2007	Kunhar	BPS-9 (22.06.2010)
17	Mr. Sar Zameen	Mr. Taj Muhammad	Buner	Matric			02-01-1955	21-02-1977	28-03-2011	Unhar	BPS-9 (28.03.2011)
							30-11-1958	13-02-1985	17-09-2011	Buner	BPS-9 (17-09-2011)

Project Director/CF
Watershed Management Project
Abbottabad

attested
RF

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TENTATIVE SENIORITY LIST OF DEPUTY RANGERS/FORESTERS WHO ARE APPOINTEE OF WATERSHED MANAGEMENT CIRCLE ABBOTTABAD
PREPARED IN PURSUANCE OF ADMINISTRATIVE DEPARTMENT NOTIFICATION NO.SO/ESTT/ENV/11-4/2K/11/1629-50, DATED 5-10-2012.
(As it stood on 31-10-2012).

#	Name of Deputy Ranger/ Forester	Qualification	Home District	Any test passed	Date of Birth	Date of appointment		Cadre	Present place of posting	Remarks
						Govt. Service	Present Grade			
✓ 1	Sarifraz Khan	Matric	Hanipur	Trained	1/5/1954	11/11/1975	28/04/2008	Daur Watershed Division	Upper Hazara Circle	Promoted rank of Ranger charge I
2	Masood-ur-Rehman	Matric	Mansehra	Trained	20/6/1954	26/10/1977	28/04/2008	Watershed Circle	Lower Hazara Circle	
3	Zareen Gul	B.A	Bunair	Trained	1/4/1954	18/3/1985	18/12/2009	Buner Watershed Division	Watershed Circle	
✓ 4	Sultan Mehmood	B.A	Mansehra	Trained	8/4/1958	26/8/1978	18/12/2009	Watershed Circle	Upper Hazara Circle	
5	Shabir Ahmed	F.A	Mansehra	Trained	28/4/1960	13/9/1978	13/09/1978	Daur Watershed Division	Lower Hazara Circle	Forester
6	Muhammad Nazir	Matric	Mansehra	Trained	5/2/1961	27/5/1979	27/05/1979	Siran Watershed Mansehra	Watershed Circle	-d
7	Muhammad Iqbal	Matric	Mansehra	Trained	1/4/1953	12/11/1975	01/11/1981	Daur Watershed Division	Lower Hazara Circle	-d
✓ 8	Muhammad Sharif	Matric	Mansehra	Trained	15/1/1956	1/6/1976	01/11/1981	Unhar Watershed Division	Upper Hazara Circle	-d
9	Abid Hussain	B.A	Mansehra	Trained	15/4/1961	23/11/1981	23/11/1981	Kunhar Watershed Division	Lower Hazara Circle	-d
10	Gulfraz-Il	Matric	Shangla	Trained	11/10/1954	1/1/1983	01/01/1983	Kohistan Watershed Division	Upper Hazara Circle	-d
11	Niamat Ullah	Matric	Shangla	Trained	12/2/1954	1/1/1983	01/01/1983	Kohistan Watershed Division	Watershed Circle	-d
12	Shujat Ali	B.A	Shangla	Trained	10/2/1963	1/11/1983	01/11/1983	Kohistan Watershed Division	Watershed Circle	-d
13	Abdul Razzaq	Matric	Shangla	Trained	6/6/1953	6/1/1985	06/01/1985	Kohistan Watershed Division	Watershed Circle	-d
14	Gul Rehman	BSc Forestry	Bunair	Trained	1/1/1965	13/3/1985	13/03/1985	Buner Watershed Division	Watershed Circle	-d
15	Haider Zaman	Matric	Abbottabad	Trained	12/1/1953	30/6/1974	11/08/1985	Daur Watershed Division	Watershed Circle	-d
16	Muhammad Shamraz	D.Com	Abbottabad	Trained	12/12/1972	22/10/1991	22/10/1991	Soka Nullah Project	Watershed Circle	-d
17	Kamran Khan	BSc Forestry	Abbottabad	Trained	1/5/1970	1/10/1992	01/10/1992	Hazara Social Forestry	Lower Hazara Circle	-d
18	Hazrat Rehman	Matric	Bunair	Trained	4/4/1957	3/7/1982	17/10/1992	Buner Watershed Division	Watershed Circle	-d
19	Mushtaq Ahmed	Under Matric	Abbottabad	Trained	10/4/1954	1/4/1976	15/12/2002	Daur Watershed Division	Watershed Circle	-d
20	Mukhtiar Alam	Under Matric	Abbottabad	Trained	20/1/1958	6/4/1977	15/12/2002	Daur Watershed Division	Watershed Circle	-d
21	Afzal Ali	B.A	Battagram	Un trained	1/1/1958	2/9/1977	22/06/2010	Unhar Watershed Division	Watershed Circle	-d
22	Syed Noor Habib Shah	Middle	Battagram	Un trained	2/1/1955	21/2/1977	28/03/2011	Unhar Watershed Division	Watershed Circle	-d
23	Sar Zameen	Matric	Bunair	Un trained	20/11/1958	13/2/1985	17/09/2011	Buner Watershed Division	Watershed Circle	-d
24	Liaqat Ali	Matric	Mansehra	Un trained	24/5/1956	22/8/1977	14/01/2012	Kunhar Watershed Division	Lower Hazara Circle	-d

[Signature]
Conservator of Forests/PD
Watershed Management Circle
Abbottabad

[Signature]
attested

Received during 8/2013

(Annex: D)

(12)

OFFICE ORDER NO. 12 DATED ABBOTTABAD THE 08 / 10 / 2013
BY SHER MUHAMMAD CONSERVATOR OF FORESTS LOWER HAZARA FOREST
CIRCLE ABBOTTABAD

As recommended by Departmental Promotion Committee in its meeting held on 30-09-2013 under the Chairmanship of Chief Conservator of Forests, Central Southern Forest Region-I Khyber Pakhtunkhwa, Peshawar the following Foresters already promoted to the rank of Deputy Rangers on acting charge basis in BPS-11 vide this office orders as noted against each are hereby regularized as Deputy Rangers in BPS-11 (Rs. 6600-460-20400) with immediate effect against the existing vacancies of Deputy Rangers in Lower Hazara Forest Circle, Abbottabad.

S.#	Name of Deputy Ranger	Office order No. and date through which they are promoted on acting charge basis
1.	Muhammad Farooq	Office order No. 90, dated 28-04-2008
2.	Mr. Gul Zaman	-do-
3.	Muhammad Hanif	Office order No. 91, dated 18-12-2009

They will continue their duties at the present place of postings.

This order is purely temporary and will not constitute any right for continuity in case of abolition of the post. In such an eventuality they will automatically stand reverted to original post without any notice.

They will remain on probation for a period of one year in terms of Section-6 (2) of the Khyber Pakhtunkhwa Civil Servants Act, 1973, read with Rules-15 (1) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.

Sher Muhammad
Conservator of Forests
Lower Hazara Forest Circle
Abbottabad

Memo.

Copy forwarded to the:

- 1- Chief Conservator of Forests, Central Southern Forest Region-I Khyber Pakhtunkhwa Peshawar for favour of information please.
- 2- Chief Conservator of Forests, Northern Forest Region-II Abbottabad for favour of information please.
- 3- Conservator of Forests, Upper Hazara Forest Circle, Mansehra.
- 4- Conservator of Forests, Watershed Management Circle, Abbottabad.
- 5- Divisional Forest Officer Kaghan Forest Division, Garhi Habibullah.
- 6- Divisional Forest Officer Agror Tanawal Forest Division, Mansehra.
- 7- Divisional Forest Officer Unhar Watershed Division, Mansehra.
- 8- ✓ All concerned

For information and necessary action.

Low
Conservator of Forests
Lower Hazara Forest Circle
Abbottabad

G. E.

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(Annex ~~B~~ E) 02

(13)

To

The Chief Conservator of Forests,
Central Southern Forest Region-I
Peshawar

Through

Proper channel

Subject

CONFIRMATION OF DEPUTY RANGER APPEAL FOR SENIORITY.

Dear Sir,

It is submitted that the appellant was appointed as Forester in Watershed Management Project on 26/08/1978. According to the combined seniority list stood on 31/12/2011 circulated by Conservator of Forests, Lower Hazara Forest Circle Abbottabad vide letter No. 1409-11/GE, dated 23/02/2012 duly endorsed by the Project Director/CF Watershed Circle No. 2541-43/E-48, dated 29/03/2012 and DFO endorsement No. 1160/DWS, dated 05/03/2012 the name of the appellant was shown at serial No. 6 (copy attached as annexure-I).

The seniority list as stood on 29/02/2012 circulated by the Project Director/CF, Watershed Management Project Abbottabad vide endorsement No. 2704-11/E-48 dated 12/03/2012, the name of the appellant was shown at serial No. 2 Copy attached as annexure-II. Same seniority list as stood on 29/02/2012 again revised due to unknown reason was circulated by the Project Director/CF, Watershed Management Project received by the appellant during 08/2013 wherein the name of the appellant is placed at serial No. 4. Copy is attached as annexure-III, whereas one junior Deputy Ranger namely Zareen Gul put at serial No. 3 which is against the rules according to my date of appointment/promotion.

In this connection, it is pointed out that Mr. Zareen Gul Deputy Ranger who is most junior from the appellant was promoted to the rank of Deputy Ranger on merit quota and after that in all the previous seniority list Mr. Zareen Gul was junior from the appellant certainly he put at serial No. 3 and now he shown senior from the appellant which is injustice as the appellant was promoted to the rank of Deputy Ranger vide Conservator of Forests, Hazara Forest circle, Abbottabad office order No. 91 dated 18/12/2009 at that time Zareen Gul was at serial No. 5 and he was two step junior from the seniority of the appellant.

It is also pointed out that as per date of appointment, date of birth and date of promotion, the appellant is senior from Mr. Zareen Gul Deputy Ranger. In this regard the appellant already preferred an appeal before your goodself but no justice have been received. As per section 8 of civil servant Act, 1973 the seniority will have be

attested
15/1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service appeal No. 351/2014.

Sultan Mehmood Acting Deputy Ranger Garhi Habibullah Forest Range Kaghan Forest Division Garhi Habibullah.

Appellant.

VERSUS.

1. Province of Khyber Pakhtunkhwa through Secretary Environment Department Peshawar.
2. Chief Conservator of Forests, Central Southern Forests Region, Khyber Pakhtunkhwa, Peshawar.
3. Chief Conservator of Forests, Northern Forests Region-II Abbottabad.
4. Conservator of Forests/Project Director, Watershed Management Circle Abbottabad.

RESPONDENTS.

AMENDED APPEAL ; UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED FINAL ORDER DATED 3.1.2014 RECEIVED /COMMUNICATED TO THE APPELLANT ON 23.2.2014, WHEREBY HIS DEPARTMENTAL APPEAL FOR CONFIRMATION AS DEPUTY RANGER HAS BEEN REJECTED BY RESPONDENT NO. 2, WITHOUT ANY REASON, DISREGARD OF THE RULES.

Respectfully sheweth;

Preliminary objections.

- i. No. final order, original or appellate has been challenged , hence the instant appeal is barred by law.
- ii. The appeal is not maintainable in the present form.
- iii. The appellant has got no cause of action.
- iv. The appellant has got no locus standi.
- v. The appellant is stopped by his own conduct to file the present appeal.
- vi. The appeal is bad due to non-joinder of necessary parties and mis-joinder of un-necessary parties.
- vii. The appeal is time barred.

FACT OF THE CASE.

Para wise comments are furnished as under:-

1. It is correct that the appellant filed an appeal in the honorable Service Tribunal and its departmental reply had also been submitted on 16.4.2015. In the meanwhile the service appeal of the appellant was under consideration with Chief Conservator of Forest Central southern Forest Region-I Peshawar for restoration of his seniority, therefore the Service Tribunal directed the appellant to file an amended appeal if he aggrieved therefore the appellant filed an amended appeal in the honorable court. On the departmental appeal of the appellant the Chief Conservator of Forests Central Southern Forest Region-I Peshawar constituted an enquiry committee vide his office order No. 93 dated 5.5.2017 **(Copy attached as annexure-I)**. The committee after thrash out the record submitted his report which was subsequently submitted to Chief Conservator of Forests Peshawar vide Conservator of Forests/PD Watershed Management Circle Abbottabad letter No. 5313/E,-48 dated 18.5.2017 **(Copy attached as annexure-II)** with the recommendation that;

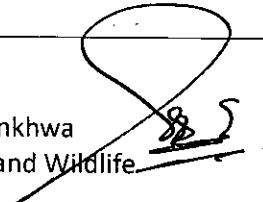
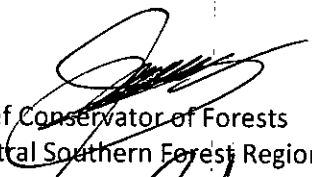
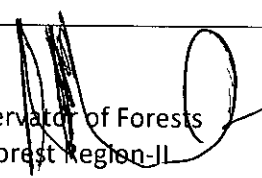
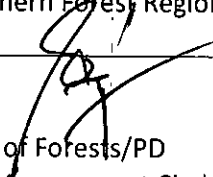
Since the appellant has deprived from the legal right of timely promotion/seniority hence the committee recommended restoration of the seniority in the cadre of Deputy Ranger from the date of promotion order No. 12 dated 8.10.2013 (Copy attached as annexure-III) with consideration of the case for further promotion as Deputy Ranger subject to the condition that the appellant shall draw his case/appeal from the court of KPK Service Tribunal.

On the receipt of enquiry report the Chief Conservator of Forests Central Southern Forest Region-I Peshawar restored his seniority with effect from 8.10.2013 vide office order No. 06 dated 5.7.2017(Copy attached as annexure-IV) with the condition that the Deputy Ranger shall with draw his service appeal from Khyber Pakhtunkhwa Peshawar and produced withdrawal letter to Conservator of Forest as well as to this office for record. Consequently the appellant promoted to the rank of Forest Ranger vide CCF-I office order No85 dated 12.01.2018 (Copy attached as annexure-V).

2. As explained in para-1 above.
3. It is correct.
4. It is correct to the extent of promotion on acting charge which does not create any right for regular promotion.
5. It is correct.
6. As explained in para-1 Above.
7. The contention of the appellant is totally incorrect, as no pick and choose policy has been adopted by the department and all orders have been issued on merit and according to the rules and policy invoked at the time of promotion.
8. It is in-correct. The seniority of the appellant was restored vide Chief Conservator of Forest Central Southern Forest Region-I Peshawar vide office order No.06 dated 5.7.2017.
9. As explained in para-1 Above.
10. As explained in para-1 Above.

PRAYERS.

In view of the aforementioned narrated facts on record, it is therefore, humbly prayed that the appeal being against the norms of justice, may kindly be dismissed with cost.

<p>Secretary Govt; of Khyber Pakhtunkhwa Forestry, Environment and Wildlife Department Peshawar.</p> 	<p>Chief Conservator of Forests Central Southern Forest Region-I Peshawar.</p> 
<p>Chief Conservator of Forests Northern Forest Region-II Abbottabad</p> 	<p>Conservator of Forests/PD Watershed Management Circle Abbottabad.</p> 

OFFICE ORDER NO. 93 DATED PESHAWAR THE 05/05/2017, ISSUED BY MUHAMMAD SIDDIQUE KHAN KHATTAK CHIEF CONSERVATOR OF FORESTS CENTRAL SOUTHERN FOREST REGION-I KHYBER PAKHTUNKHWA PESHAWAR.

On receipt of appeal in respect of Mr. Sultan Mehmood Deputy Ranger in connection with promotion of Deputy Ranger to the rank of Forest Ranger, a committee comprising of the following officers is hereby constituted for probing into the appeal.

- | | |
|--|----------|
| 1. Mr. Javed Arshad
Conservator of Forests
Watershed Management Circle
Abbottabad | Chairman |
| 2. Muhammad Younis
Conservator of Forests
Upper Hazara Forest Circle
Mansehra | Member |
| 3. Mr. Zahoor Jan
Senior Clerk Regional Office
Peshawar | Member |

The committee should submit their report within fifteen days positively

(Muhammad Siddique Khan Khattak)
Chief Conservator of Forests
Central Southern Forest Region-1
Khyber Pakhtunkhwa Peshawar

Memorandum.

No. 3031-3034/E, dated Peshawar the, 05/05/2017

Copy forwarded for information and necessary action to the:-

1. Chief Conservator of Forests Northern Forest Region-II Abbottabad
2. Conservator of Forests, Watershed Management Circle, Abbottabad
3. Conservator of Forests Upper Hazara Forest Circle Mansehra
4. The Officer in Charge

Chief Conservator of Forests
Central Southern Forest Region-1
Khyber Pakhtunkhwa Peshawar

Attested

Attested

DIVISIONAL FOREST OFFICER
DUAR WATERSHED DIVISION
ABBOTTABAD

DIVISIONAL FOREST OFFICER
DUAR WATERSHED DIVISION
ABBOTTABAD

Annexure - II



Tel: 0992-9310304
Fax: 0992-9310303

OFFICE OF THE
CONSERVATOR OF FORESTS
WATERSHED MANAGEMENT CIRCLE
ABBOTTABAD

No. /E-48 dated 18/05/2017

The Chief Conservator of Forests
Central Southern Forest Region-I
Peshawar

Subject: CONSTITUTION OF COMMITTEE IN THE APPEAL OF MR. SULTAN
MEHMOOD DEPUTY RANGER

Ref: your office order No.93 dated 5/5/2017 and this office No.5090-91/E dated 15.5.2017

The committee held its meeting in the office of the undersigned on 18.5.2017 at 10 AM to thrash out the record and consider the appeal on the subject.

Minutes of the said meeting is sent herewith for favour of further necessary action.

Conservator of Forests/PD
Watershed Management Circle
Abbottabad

Encl: As Above

No. 5314-15/E-48

Copy alongwith copy of the minutes of the meeting dated 18.5.2017 forwarded to the:

- ✓ 1. Chief Conservator of Forests Northern Forest Region-II Abbottabad.
- 2. Conservator of Forests Upper Hazara Forest Circle Mansehra

For favour of information please.

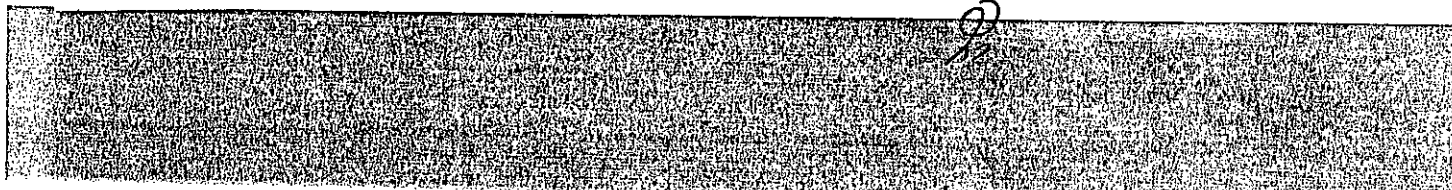
Conservator of Forests/PD
Watershed Management Circle
Abbottabad

Encl: As Above

DD Form 4 (Rev. 01/01/07)

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27-5-2017
Attested
DIVISIONAL FOREST OFFICER
DUAR WATERSHED DIVISION
ABBOTTABAD

Attested
DIVISIONAL FOREST OFFICER
DUAR WATERSHED DIVISION
ABBOTTABAD



177

OFFICE ORDER NO. 12 DATED ABBOTTABAD THE 28. 10/2013 ISSUED
BY GARDAR MUHAMMAD SULTAN CONSERVATOR OF FORESTS/PD
WATERSHED MANAGEMENT CIRCLE ABBOTTABAD

As recommended, by Departmental Promotion Committee in its meeting held on 30-09-2013 under the Chairmanship of Chief Conservator of Forests, Central Southern Forest Region-I Khyber Pakhtunkhwa Peshawar the following Foresters already promoted to the rank of Deputy Rangers on acting charge basis in BPS-11 vide Conservator of Forests, Hazara Forest Circle Abbottabad office orders as noted against each are hereby regularized as Deputy Rangers in BPS-11 (Rs. 6600-460-20400) with immediate effect against the existing vacancies of Deputy Rangers in Watershed Management Circle, Abbottabad.

S.#	Name of Deputy Ranger	Office order No. and date through which they were promoted on acting charge basis.
1	Mr. Masood-ur-Rehman	Office Order No.90, dated 28/4/2008
2	Mr. Zareen Gul	Office Order No.91, dated 18/12/2009

They will continue their duties at the present place of postings.

This order is purely temporary and will not constitute any right for continuity in case of abolition of the post. In such an eventuality they will automatically stand reverted to original post without any notice.

They will remain on probation for a period of one year in terms of Section-6 (2) of the Khyber Pakhtunkhwa Civil Servants Act, 1973, read with Rules-15 (1) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.

(Gardar Muhammad Sultan)
 Conservator of Forests/PD
 Watershed Management Circle
 Abbottabad

Memo.

Copy forwarded to the:

- 1- Chief Conservator of Forests, Central Southern Forest Region-I Khyber Pakhtunkhwa Peshawar for favour of information please.
- 2- Chief Conservator of Forests, Northern Forest Region-II Abbottabad for favour of information please.
- 3- Conservator of Forests, Lower Hazara Forest Circle, Abbottabad

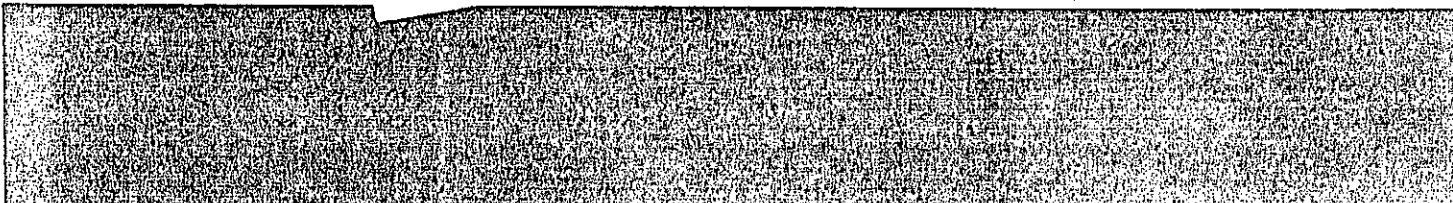
Conservator of Forests, Buner Watershed Division at

For information of the Department at

Conservator of Forests
 Watershed Management Circle
 Abbottabad

Accepted
 DIVISIONAL FOREST OFFICER
 DUAR WATERSHED DIVISION
 ABBOTTABAD

Accepted
 DIVISIONAL FOREST OFFICER
 DUAR WATERSHED DIVISION
 ABBOTTABAD



OFFICE ORDER NO 06 DATED PESHAWAR THE 05 10/7 /2017
ISSUED BY MR. MUHAMMAD SIDDIQUE KHAN KHATTAK CHIEF
CONSERVATOR OF FORESTS CENTRAL SOUTHERN FOREST REGION-I
KHYBER PAKHTUNKHWA PESHAWAR

P. 51

As recommended by the Committee constituted vide this Office Order No. 93, dated 5/5/2017 on the appeal of Mr. Sultan Mehmood Deputy Ranger, the Competent Authority is pleased to order restoration of seniority in respect of Mr. Sultan Mehmood Deputy Ranger of Watershed Management Circle, Abbottabad w.c.f. 8/10/2013 with the condition that the Deputy Ranger shall withdraw his service appeal from Khyber Pakhtunkhwa Service Tribunal, Peshawar.

Sd/-

(Muhammad Siddique Khan Khattak)
Chief Conservator of Forests
Central Southern Forest Region-I
Khyber Pakhtunkhwa Peshawar

No. 33-34 *is B & III file.*

Copy forwarded for information and necessary action to the:-

1. Chief Conservator of Forests Northern Forest Region-II Abbottabad
2. Conservator of Forests Watershed Management Circle, Abbottabad.

He is requested to direct the Deputy Ranger to withdraw his service appeal from the Court of Khyber Pakhtunkhwa Service Tribunal, Peshawar and produce withdrawal letter to Conservator of Forests as well as to this office for record.

Chief Conservator of Forests
Central Southern Forest Region-I
Khyber Pakhtunkhwa Peshawar

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Kw
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Accepted

Accepted

DIVISIONAL FOREST OFFICER
DUAR WATERSHED DIVISION
ABBOTTABAD

DIVISIONAL FOREST OFFICER
DUAR WATERSHED DIVISION
ABBOTTABAD

OFFICE ORDER NO. 95 DATED PESHAWAR THE 17/2/2018 1331
 MUHAMMAD SIDDIQUE KHAN KHATTAK CHIEF CONSERVATOR OF FORESTS CENTRAL
 SOUTHERN FOREST REGION-I, KHYBER PAKHTUNKHWA PESHAWAR.

On the recommendations of Departmental Promotion Committee, the following Deputy Rangers (BPS-12) are hereby promoted to the post of Forest Rangers (BPS-16) on regular basis, with immediate effect:-

1. Mr. Siraj Muhammad.
2. Muhammad Yousaf-II.
3. Muhammad Hyas.
4. Mr. Sher Amanullah.
5. Mr. Sakhi Jan.
6. Mr. Nadar Khan.
7. Syed Abdul Wahid Bacha.
8. Mr. Rab Nawaz.
9. Syed Abid Hussain Shah.
10. Muhammad Yaqoob.
11. Mr. Hameedullah.
12. Mr. Sultan Mehmood.

This order is purely temporary and will not constitute any right for continuity in case of abolition of the post. In such an eventuality they will automatically stand reverted to original post without any notice.

They will remain on probation for a period of one year extendable for another one year in terms of Section-6 (2) of the Khyber Pakhtunkhwa Civil Servants Act, 1973, read with Rules 15 (1) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989.

On their promotion the following postings /transfers are hereby ordered in the interest of public service with immediate effect:-

S.No.	Name and Designation	From	To
1.	Mr. Siraj Muhammad	On promotion	To continue in FP&M Circle, Peshawar.
2.	Muhammad Yousaf-II	--do--	To continue in FP&M Circle, Peshawar.
3.	Muhammad Hyas	--do--	To continue in FATA Circle, Peshawar.
4.	Mr. Sher Amanullah	--do--	Thal Range of Kohat Forest Division.
5.	Mr. Sakhi Jan	--do--	To continue on FR Tank of South Waziristan FATA Forest Division.
6.	Mr. Nadar Khan	--do--	To continue on Jandool Forest Sub-Division of Lower Dir Forest Division.
7.	Syed Abdul Wahid Bacha	--do--	To continue on Darora Range of Upper Dir Forest Division.
8.	Mr. Rab Nawaz	--do--	Working Plan Circle Peshawar.
9.	Syed Abid Hussain Shah	--do--	Working Plan Circle Peshawar.
10.	Muhammad Yaqoob	--do--	To continue as I/C Kohat Forest Sub-Division.
11.	Mr. Hameedullah	--do--	To continue on Sheikh Buddin Forest Sub-Division of D.Khan Forest Division.
12.	Mr. Sultan Mehmood	--do--	To continue on Abai Watershed Range of Unbar Watershed Division Manshra.

Sd/-
 (Muhammad Siddique Khan Khattak)
 Chief Conservator of Forests
 Central Southern Forest Region-I
 Khyber Pakhtunkhwa Peshawar

Ali Eted
 DIVISIONAL FOREST OFFICER
 DUAR WATERSHED DIVISION
 ABBOTTABAD

Ali Eted
 DIVISIONAL FOREST OFFICER
 DUAR WATERSHED DIVISION
 ABBOTTABAD

No. 2441-49/B

Copy forwarded for information and necessary action to the:-

1. Chief Conservator of Forests Northern Forest Region-II Abbottabad.
2. Chief Conservator of Forests Malakand Forest Region-III Saibu Sharif Swat.
3. Conservator of Forests Watershed Circle Abbottabad.
4. Conservator of Forests FP&M Circle Peshawar.
5. Conservator of Forests Malakand West Forest Circle Timergara.
6. Conservator of Forests Southern Circle Peshawar.
7. Conservator of Forests FATA Circle Peshawar.
8. Director Budget & Accounts Officer Government of Khyber Pakhtunkhwa Forestry, Environment & Wildlife Department Peshawar.
9. Section Officer (Establishment) Government of Khyber Pakhtunkhwa Forestry, Environment & Wildlife Department Peshawar.

Chief Conservator of Forests
 Central/Southern Forest Region-I
 Khyber Pakhtunkhwa Peshawar

Handwritten signature
 17/01

No. 1323/B, dated Abbottabad the 18/1/2018

Copy forwarded to the Conservator of Forests/PD Watershed Management Circle, Abbottabad for information and necessary action.

Chief Conservator of Forests
 Northern Forest Region-II Abbottabad
 Khyber Pakhtunkhwa

Attested
 DIVISIONAL FOREST OFFICER
 DUAR WATERSHED DIVISION
 ABBOTTABAD

Attested
 DIVISIONAL FOREST OFFICE
 DUAR WATERSHED DIVISION
 ABBOTTABAD

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service appeal No. 351/2014.

Sultan Mehmood Acting Deputy Ranger Garhi Habibullah Forest Range Kaghan Forest Division Garhi Habibullah.

Appellant.

VERSUS.

1. Province of Khyber Pakhtunkhwa through Secretary Environment Department Peshawar.
2. Chief Conservator of Forests, Central Southern Forests Region, Khyber Pakhtunkhwa, Peshawar.
3. Chief Conservator of Forests, Northern Forests Region-II Abbottabad.
4. Conservator of Forests/Project Director, Watershed Management Circle Abbottabad.

RESPONDENTS.

AMENDED APPEAL ; UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED FINAL ORDER DATED 3.1.2014 RECEIVED /COMMUNICATED TO THE APPELLANT ON 23.2.2014, WHEREBY HIS DEPARTMENTAL APPEAL FOR CONFIRMATION AS DEPUTY RANGER HAS BEEN REJECTED BY RESPONDENT NO. 2, WITHOUT ANY REASON, DISREGARD OF THE RULES.

Respectfully sheweth;

Preliminary objections.

- i. No. final order, original or appellate has been challenged , hence the instant appeal is barred by law.
- ii. The appeal is not maintainable in the present form.
- iii. The appellant has got no cause of action.
- iv. The appellant has got no locus standi.
- v. The appellant is stopped by his own conduct to file the present appeal.
- vi. The appeal is bad due to non-joinder of necessary parties and mis-joinder of un-necessary parties.
- vii. The appeal is time barred.

FACT OF THE CASE.

Para wise comments are furnished as under:-

1. It is correct that the appellant filed an appeal in the honorable Service Tribunal and its departmental reply had also been submitted on 16.4.2015. In the meanwhile the service appeal of the appellant was under consideration with Chief Conservator of Forest Central southern Forest Region-I Peshawar for restoration of his seniority, therefore the Service Tribunal directed the appellant to file an amended appeal if he aggrieved therefore the appellant filed an amended appeal in the honorable court. On the departmental appeal of the appellant the Chief Conservator of Forests Central Southern Forest Region-I Peshawar constituted an enquiry committee vide his office order No. 93 dated 5.5.2017 **(Copy attached as annexure-I)**. The committee after thrash out the record submitted his report which was subsequently submitted to Chief Conservator of Forests Peshawar vide Conservator of Forests/PD Watershed Management Circle Abbottabad letter No. 5313/E,-48 dated 18.5.2017 **(Copy attached as annexure-II)** with the recommendation that;


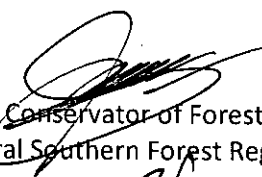
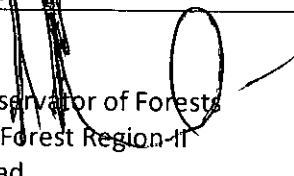
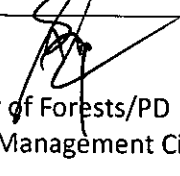
Since the appellant has deprived from the legal right of timely promotion/seniority hence the committee recommended restoration of the seniority in the cadre of Deputy Ranger from the date of promotion order No. 12 dated 8.10.2013 (Copy attached as annexure-III) with consideration of the case for further promotion as Deputy Ranger subject to the condition that the appellant shall draw his case/appeal from the court of KPK Service Tribunal.

On the receipt of enquiry report the Chief Conservator of Forests Central Southern Forest Region-I Peshawar restored his seniority with effect from 8.10.2013 vide office order No. 06 dated 5.7.2017(Copy attached as annexure-IV) with the condition that the Deputy Ranger shall with draw his service appeal from Khyber Pakhtunkhwa Peshawar and produced withdrawal letter to Conservator of Forest as well as to this office for record. Consequently the appellant promoted to the rank of Forest Ranger vide CCF-I office order No85 dated 12.01.2018 (Copy attached as annexure-V).

2. As explained in para-1 above.
3. It is correct.
4. It is correct to the extent of promotion on acting charge which does not create any right for regular promotion.
5. It is correct.
6. As explained in para-1 Above.
7. The contention of the appellant is totally incorrect, as no pick and choose policy has been adopted by the department and all orders have been issued on merit and according to the rules and policy invoked at the time of promotion.
8. It is in-correct. The seniority of the appellant was restored vide Chief Conservator of Forest Central Southern Forest Region-I Peshawar vide office order No.06 dated 5.7.2017.
9. As explained in para-1 Above.
10. As explained in para-1 Above.

PRAYERS.

In view of the aforementioned narrated facts on record, it is therefore, humbly prayed that the appeal being against the norms of justice, may kindly be dismissed with cost.

<p>Secretary Govt; of Khyber Pakhtunkhwa Forestry, Environment and Wildlife Department Peshawar.</p> 	<p>Chief Conservator of Forests Central Southern Forest Region-I Peshawar.</p> 
<p>Chief Conservator of Forests Northern Forest Region-II Abbottabad</p> 	<p>Conservator of Forests/PD Watershed Management Circle Abbottabad.</p> 

Annexure - I

OFFICE ORDER NO. 93 DATED PESHAWAR THE 05/05/2017, ISSUED BY MUHAMMAD SHDIQUE KHAN KHATTAK CHIEF CONSERVATOR OF FORESTS CENTRAL SOUTHERN FOREST REGION-I KHYBER PAKHTUNKHWA PESHAWAR.

On receipt of appeal in respect of Mr. Sultan Mehmood Deputy Ranger in conjunction with promotion of Deputy Ranger to the rank of Forest Ranger, a committee comprising of the following officers is hereby constituted for probing into the appeal.

1. Mr. Javed Arshad
Conservator of Forests
Watershed Management Circle
Abbottabad
Chairman
2. Muhammad Younis
Conservator of Forests
Upper Hazara Forest Circle
Manshra
Member
3. Mr. Zahoor Jan
Senior Clerk Regional Office
Peshawar
Member

The committee should submit their report within fifteen days positively

(Muhammad Siddique Khan Khattak)
Chief Conservator of Forests
Central Southern Forest Region-I
Khyber Pakhtunkhwa Peshawar

Memorandum.

No. 3031-3034/E, dated Peshawar the, 05/05/2017

Copy forwarded for information and necessary action to the:-

1. Chief Conservator of Forests, Northern Forest Region-II Abbottabad
2. Conservator of Forests, Watershed Management Circle, Abbottabad
3. Conservator of Forests, Upper Hazara Forest Circle Manshra
4. Office Order File

Chief Conservator of Forests
Central Southern Forest Region-I
Khyber Pakhtunkhwa Peshawar

Attested

DIVISIONAL FOREST OFFICER
DUAR WATERSHED DIVISION
ABBOTTABAD

Attested
DIVISIONAL FOREST OFFICER
DUAR WATERSHED DIVISION
ABBOTTABAD

Annexure — II



Tel: 0992-9310304
Fax: 0992-9310303

OFFICE OF THE
CONSERVATOR OF FORESTS
WATERSHED MANAGEMENT CIRCLE
ABBOTTABAD

No. /E-48 dated 18/05/2017

The Chief Conservator of Forests
Central Southern Forest Region-I
Peshawar

Subject: CONSTITUTION OF COMMITTEE IN THE APPEAL OF MR. SULTAN
MEHMOOD DEPUTY RANGER

Ref: your office order No.93 dated 5.5.2017 and this office No.5090-91/E dated
15.5.2017

The committee held its meeting in the office of the undersigned on 18.5.2017 at 10 AM
to thrash out the record and consider the appeal on the subject.

Minutes of the said meeting is sent herewith for favour of further necessary action.

Conservator of Forests/PD
Watershed Management Circle
Abbottabad

Encl: As Above

No. 534/E-48

Copy alongwith copy of the minutes of the meeting dated 18.5.2017 forwarded to the:

- ✓ 1. Chief Conservator of Forests Northern Forest Region-II Abbottabad.
2. Conservator of Forests Upper Hazara Forest Circle Mansehra

For favour of information please.

Conservator of Forests/PD
Watershed Management Circle
Abbottabad

Encl: As Above

Sec 114
Attested
DIVISIONAL FOREST OFFICER
DUAR WATERSHED DIVISION
ABBOTTABAD

5493
22-5-2017
Attested
DIVISIONAL FOREST OFFICER
DUAR WATERSHED DIVISION
ABBOTTABAD

18/5

OFFICE ORDER NO. 19 DATED ABBOTTABAD THE 08. 11/01/2013 ISSUED
BY SARDAR MUHAMMAD SULTAN CONSERVATOR OF FORESTS/CD
WATERSHED MANAGEMENT CIRCLE ABBOTTABAD

As recommended by Departmental Promotion Committee in its meeting held on 30-09-2013 under the Chairmanship of Chief Conservator of Forests, Central Southern Forest Region-I Khyber Pakhtunkhwa Peshawar the following Foresters already promoted to the rank of Deputy Rangers on acting charge basis in BPS-11 vide Conservator of Forests, Hazara Forest Circle Abbottabad office orders as noted against each are hereby regularized as Deputy Rangers in BPS-11 (Rs. 6600/460-20400) with immediate effect against the existing vacancies of Deputy Rangers in Watershed Management Circle, Abbottabad.

S.#	Name of Deputy Ranger	Office order No. and date through which they were promoted on acting charge basis.
1	Mr. Masood-ur-Rehman	Office Order No.90, dated 28/4/2009
2	Mr. Zareen Gul	Office Order No.91, dated 18/12/2009

They will continue their duties at the present place of postings.

This order is purely temporary and will not constitute any right for continuity in case of abolition of the post. In such an eventuality they will automatically stand reverted to original post without any notice.

They will remain on probation for a period of one year in terms of Section-6 (2) of the Khyber Pakhtunkhwa Civil Servants Act, 1973, read with Rules-15 (1) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.

(Sardar Muhammad Sultan)
 Conservator of Forests/CD
 Watershed Management Circle
 Abbottabad

Memo.

Copy forwarded to the:

- 1- Chief Conservator of Forests, Central Southern Forest Region-I Khyber Pakhtunkhwa Peshawar for favour of information please.
- 2- Chief Conservator of Forests, Northern Forest Region-II Abbottabad for favour of information please.
- 3- Conservator of Forests, Lower Hazara Forest Circle, Abbottabad

Regional Forest Officer Buner Watershed Division at Buner

For information of the Conservator of Forests, Abbottabad

Conservator of Forests/CD
 Watershed Management Circle
 Abbottabad

DIVISIONAL FOREST OFFICER
 DUAR WATERSHED DIVISION
 ABBOTTABAD

DIVISIONAL FOREST OFFICER
 DUAR WATERSHED DIVISION
 ABBOTTABAD

Attested

Attested

PS

PS

OFFICE ORDER NO 06 DATED PESHAWAR THE 05 10/7/2017
ISSUED BY MR. MUHAMMAD SIDDIQUE KHAN KHATTAK CHIEF
CONSERVATOR OF FORESTS CENTRAL SOUTHERN FOREST REGION-I
KHYBER PAKHTUNKHWA PESHAWAR

Handwritten initials/signature

As recommended by the Committee constituted vide this Office Order No. 93, dated 5/5/2017 on the appeal of Mr. Sultan Mahmood Deputy Ranger, the Competent Authority is pleased to order restoration of seniority in respect of Mr. Sultan Mahmood Deputy Ranger of Watershed Management Circle, Abbottabad w.e.f. 8/10/2013 with the condition that the Deputy Ranger shall withdraw his service appeal from Khyber Pakhtunkhwa Service Tribunal, Peshawar.

Sd/-

(Muhammad Siddique Khan Khattak)
Chief Conservator of Forests
Central Southern Forest Region-I
Khyber Pakhtunkhwa Peshawar

No. 33-34 *is B & III file*

Copy forwarded for information and necessary action to the:-

1. Chief Conservator of Forests Northern Forest Region-II Abbottabad
2. Conservator of Forests Watershed Management Circle, Abbottabad.

He is requested to direct the Deputy Ranger to withdraw his service appeal from the Court of Khyber Pakhtunkhwa Service Tribunal, Peshawar and produce withdrawal letter to Conservator of Forests as well as to this office for record.

Chief Conservator of Forests
Central Southern Forest Region-I
Khyber Pakhtunkhwa Peshawar

Handwritten signature

Handwritten initials/signature

Attested

Attested

DIVISIONAL FOREST OFFICER
DUAR WATERSHED DIVISION
ABBOTTABAD

DIVISIONAL FOREST OFFICER
DUAR WATERSHED DIVISION
ABBOTTABAD

OFFICE ORDER NO. 21 DATED PESHAWAR THE 17/2 2018
 MUHAMMAD SIDDIQUE KHAN KHATTAK CHIEF CONSERVATOR OF FORESTS CENTRAL
 SOUTHERN FOREST REGION-I, KHYBER PAKHTUNKHWA PESHAWAR.

On the recommendations of Departmental Promotion Committee, the following Deputy Rangers (BPS-12) are hereby promoted to the post of Forest Rangers (BPS-16) on regular basis, with immediate effect:-

1. Mr. Siraj Muhammad.
2. Muhammad Yousaf-II.
3. Muhammad Hyas.
4. Mr. Sher Amanullah.
5. Mr. Sakhi Jan.
6. Mr. Nadar Khan.
7. Syed Abdul Wahid Bacha.
8. Mr. Rab Nawaz.
9. Syed Abid Hussain Shah.
10. Muhammad Yaqoob.
11. Mr. Hameedullah.
12. Mr. Sultan Mehmood.

This order is purely temporary and will not constitute any right for continuity in case of abolition of the post. In such an eventuality they will automatically stand reverted to original post without any notice.

They will remain on probation for a period of one year extendable for another one year in terms of Section-6 (2) of the Khyber Pakhtunkhwa Civil Servants Act, 1973, read with Rules 15 (F) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989.

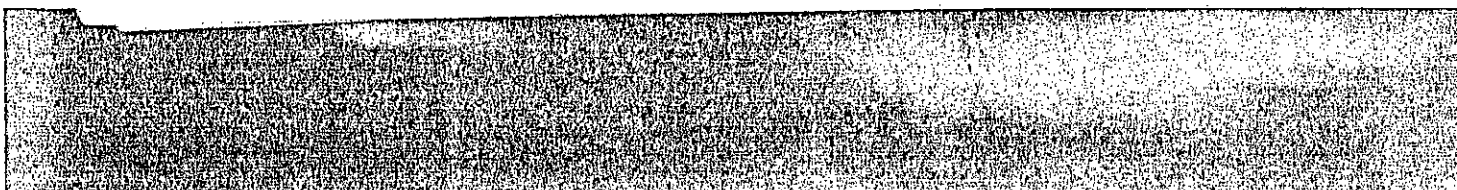
On their promotion the following postings /transfers are hereby ordered in the interest of public service with immediate effect:-

S.No.	Name and Designation	From	To
1.	Mr. Siraj Muhammad	On promotion	To continue in FP&M Circle, Peshawar.
2.	Muhammad Yousaf-II	--do--	To continue in FP&M Circle, Peshawar.
3.	Muhammad Hyas	--do--	To continue in FATA Circle, Peshawar.
4.	Mr. Sher Amanullah	--do--	Thal Range of Kohat Forest Division.
5.	Mr. Sakhi Jan	--do--	To continue on FR Tank of South Waziristan FATA Forest Division.
6.	Mr. Nadar Khan	--do--	To continue on Jandool Forest Sub-Division of Lower Dir Forest Division.
7.	Syed Abdul Wahid Bacha	--do--	To continue on Darora Range of Upper Dir Forest Division.
8.	Mr. Rab Nawaz	--do--	Working Plan Circle Peshawar.
9.	Syed Abid Hussain Shah	--do--	Working Plan Circle Peshawar.
10.	Muhammad Yaqoob	--do--	To continue as I/C Kohat Forest Sub-Division.
11.	Mr. Hameedullah	--do--	To continue on Sheikh Buddin Forest Sub-Division of D.L.Khan Forest Division.
12.	Mr. Sultan Mehmood	--do--	To continue on Ahar Watershed Range of Unhar Watershed Division Manshehra.

Sd/-
 (Muhammad Siddique Khan Khattak)
 Chief Conservator of Forests
 Central Southern Forest Region-I
 Khyber Pakhtunkhwa Peshawar

Ali Steed
 DIVISIONAL FOREST OFFICER
 DUAR WATERSHED DIVISION
 ABBOTTABAD

Ali Steed
 DIVISIONAL FOREST OFFICER
 DUAR WATERSHED DIVISION
 ABBOTTABAD



No. 2471-49 /B

Copy forwarded for information and necessary action to the:-

1. Chief Conservator of Forests Northern Forest Region-II Abbottabad.
2. Chief Conservator of Forests Malakand Forest Region-III Saidu Sharif Swat.
3. Conservator of Forests Watershed Circle Abbottabad.
4. Conservator of Forests FP&M Circle Peshawar.
5. Conservator of Forests Malakand West Forest Circle Timergara.
6. Conservator of Forests Southern Circle Peshawar.
7. Conservator of Forests FATA Circle Peshawar.
8. Director Budget & Accounts Officer Government of Khyber Pakhtunkhwa Forestry, Environment & Wildlife Department Peshawar.
9. Section Officer (Establishment) Government of Khyber Pakhtunkhwa Forestry, Environment & Wildlife Department Peshawar.

Chief Conservator of Forests
 Central/Southern Forest Region-I
 Khyber Pakhtunkhwa Peshawar

EC
17/01

No. 1374 /B, dated Abbottabad the 18/1/2018

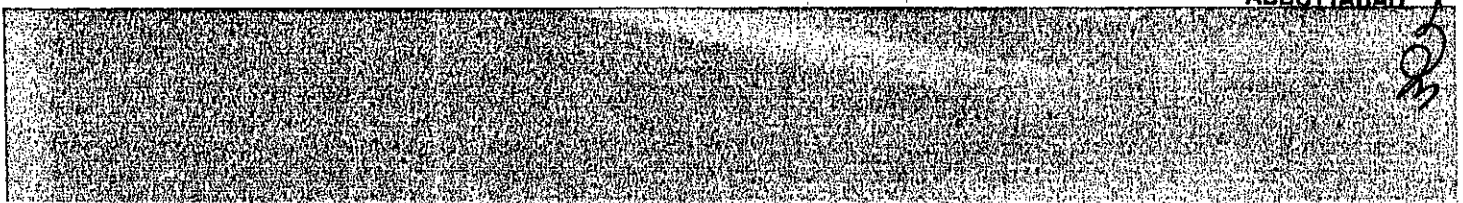
Copy forwarded to the Conservator of Forests/PD, Watershed Management Circle, Abbottabad for information and necessary action.

Chief Conservator of Forests
 Northern Forest Region-II Abbottabad
 Khyber Pakhtunkhwa

Accepted
[Signature]
 DIVISIONAL FOREST OFFICER
 DUAR WATERSHED DIVISION
 ABBOTTABAD

Accepted

[Signature]
 DIVISIONAL FOREST OFFICER
 DUAR WATERSHED DIVISION
 ABBOTTABAD



(14)
determined on the basis of length of service, thus the appellant is entitled for seniority.

But now The Conservator of Forests/PD Watershed Management Circle Abbottabad issue order No.12 dated 8/10/2013 and regularized the service of Two Deputy Ranger i.e. M/S Masood-ur-Rehman and Zareen Gul and committee again ignored the appellant which seem to clear violation of the rule. The honorable Service Tribunal KPK Peshwar already announced judgment dated 10.1.2012 in case title Shabbir Ahmed Forester VS Govt. regarding promotion against 25% quota copy of the same enclosed as annexure-III.

In view of the aforesaid facts, it is humbly prayed that the case of the appellant may be reviewed and correct the impugned seniority list and regularized the service of the appellant and also promoted the rank of Forest Ranger keeping in view the long service please.

Dated:- 28-10-2013

Your Obediently




Sultan Mehmood
Deputy Ranger Incharge
Garhi Habibullah Forest
Range Kaghan Forest
Division.

Copy in advance to:

- 1) - Chief Conservator of Forests, Central Southern Forest Region-I
Khyber-Pakhtunkhwa, Peshawar.
- 2) - Project Director/Conservator of Forests, Watershed Management
Project, Abbottabad
For favour of information and necessary action please.

Dated: 28-10-2013

Your Obediently



Sultan Mehmood
Deputy Ranger Incharge
Garhi Habibullah Forest
Range Kaghan Forest
Division.

attested
ST

(Answer: F)

(15)

The Chief Conservator of Forests Northern Forest Region-II Abbottabad.

No. 2064 / E, dated Peshawar the 3 / 1 / 2014.

Subject: CONFIRMATION OF DEPUTY RANGER APPEAL FOR SENIORITY.

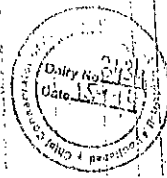
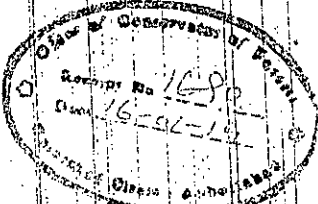
Reference: your letter No. 4448/B, dated 23.12.2013.

As recommended by you vide letter cited above, the appeal of Mr. Sultan Mahmood D/Ranger on acting charge basis is hereby rejected.

It is therefore requested to inform the applicant accordingly.

CHIEF CONSERVATOR OF FORESTS GENERAL SOUTHERN FORESTS REGION KHYBER PAKHTUNKHWA PESHAWAR.

Handwritten signature and initials



No. 5271 / E, Dated Abbottabad the 15 / 1 / 2014

Copy in continuation of this office endorsement No. 4449/B, dated 23.12.2013 forwarded to the Conservator of Forests Watershed Management Circle, Abbottabad for information and necessary action.

Handwritten signature
Chief Conservator of Forests Northern Forest Region-II Abbottabad Khyber Pakhtunkhwa

Handwritten initials

Handwritten note: Received on 23-02-2014. *Handwritten signature and date:* 23-02-2014.

Handwritten note: attested *Handwritten signature*

(Annex: G)
(REGULATION WING)
Dated Peshawar, the 16th, February, 2010

NOTIFICATION

No.SOR-VI (E&AD)1-3/2009/Vol-VIII: - In exercise of the powers conferred by Section 26 of the North-West-Frontier Province Civil Servants Act, 1973 (N.W.F.P. Act No.XVIII of 1973), read with this Department's Notification No.SOR-I(S&GAD)1-206/74/Vol:V, dated 18th April 1989, the Chief Minister of the North-West-Frontier Province is pleased to direct that in the North-West-Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules 1989, the following further amendment shall be made, namely:

AMENDMENT

For rule 15, the following shall be substituted, namely:

"15. Probation. --- (1) Persons appointed to posts by initial recruitment, promotion or transfer shall be on probation for a period of one year.

(2) The appointing authority, if considers necessary, may extend the probation period for one year as may be specified at the time of appointment.

(3) On the successful completion of probation period, the appointing authority shall, by specific order, terminate the probation:

Provided that if no specific order is issued on the expiry of the first year of probation period, the period of probation shall be deemed to have been extended under sub-rule (2):

Provided further that if no specific order is issued on the expiry of the extended period of probation, the period of probation shall be deemed to have been successfully completed".

**CHIEF SECRETARY
GOVERNMENT OF NWFP**

Encls: No. and dated even.

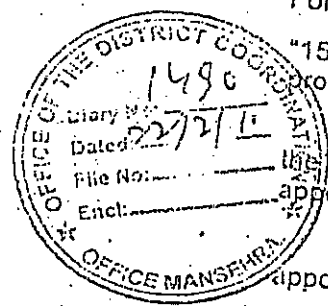
Copy forwarded to:-

1. Additional Chief Secretary, Govt of NWFP, Planning & Development Department.
2. Additional Chief Secretary (FATA), FATA Secretariat Peshawar.
3. Additional Chief Secretary, Govt of NWFP Home & Tribal Affairs Department.
4. The Senior Member, Board of Revenue, NWFP.
5. All Administrative Secretaries to Govt. of NWFP.
6. The Secretary to Governor, NWFP.
7. The Principal Secretary to Chief Minister, NWFP.
8. All Divisional Commissioners in NWFP.
9. All Heads of Attached Departments in NWFP.
10. All District Coordination Officers in NWFP and Political Agents in FATA.
11. The Registrar Peshawar High Court, Peshawar.
12. The Registrar, NWFP Service Tribunal, Peshawar.
13. The Secretary, NWFP Public Service Commission, Peshawar.
14. All Additional Secretaries, Deputy Secretaries and Section Officers in Establishment & Administration Department.

(KALEEM ULLAH)
SECTION OFFICER (REG: VI)

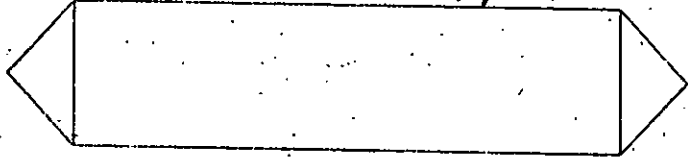
attested
[Signature]

(f T. e)



D.G. Am
19/2/10

Before the K.P.K Service Tribunal Peshawar



Sultan Mahmood
Appellant

Province of K.P.K etc

2 مخدوم

13-3-2014

مقدمہ

Sultan Mahmood

مقدمہ

Service Appeal

دعویٰ

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ
آن مقام Peshawar کیلئے
Shahzada Irfan Zia Advocate
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زر میں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی براندگی
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت
مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے
اور اس کا ساختہ پر داخنتہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے
سبب سے دہوگا۔ کوئی تاریخ پیشی مقام روزہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں
گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

Accepted by

2014

March

at

13th

المرقوم

Sultan Mahmood

العہد گاہ العہد

کے لئے منظور ہے۔

Peshawar

مقام

عدالت سیشنری مارت
چیک سیشنری ڈاؤن ٹون: 2220193
Mob: 0345-9223239

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

APPEAL NO.351/2014.

Mr. Sultan Mehmood Acting Deputy Ranger Garhi Habibullah Forest Range Kaghan Forest Division.

APPELLANT

VERSUS

1. Secretary to Govt; of Khyber Pakhtunkhwa Environment Department. Peshawar
2. Chief Conservator of Forests Central Southern Forest Region-I Khyber Pakhtunkhwa.Peshawar.
3. Chief Conservator of Forests Northern Forest Region-II Abbottabad.
4. Conservator of Forests/PD Watershed Management Circle Abbottabad

.....RESPONDENTS.

COUNTER AFFIDAVIT.

The undersigned do hereby solemnly affirms and declare on oath that the contents of our written reply in the appeal is correct to the best of my knowledge and record, nothing has been concealed from the Honourable Tribunal.

Conservator of Forests PD
Watershed Management Circle
Abbottabad

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 351/2014

Sultan Mehmood Acting Deputy Ranger,
Garhi Habibullah Forest Range
Kaghan Forest Division, Garhi Habibullah.....Appellant

VERSUS

1. Province of Khyber Pakhtunkhwa through
Secretary Environment Department Peshawar
2. Chief Conservator of Forests, Central Southern
Forests Region, Khyber Pakhtunkhwa Peshawar.
3. Chief Conservator of Forests, Northern Forest
Region-II, Abbottabad
4. Conservator of Forest Project Director,
Watershed Management Circle Abbottabad Respondent

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED FINAL ORDER DATED 03.01.2014 RECEIVED/COMMUNICATED TO THE APPELLANT ON 23.02.2014, WHEREY HIS DEPARTMENTAL APPEAL FOR CONFIRMATION AS DEPUTY RANGER HAS BEEN REJECTED BY RESPONDENT NO.2, WITHOUT ANY REASON DISREGARD OF THE RULES.

Respectfully Sheweth:

Preliminary objections

- i- No order appellatant or original order has been made impugned, hence the instant appeal is barred by law.
- ii- The appeal is not maintainable in the present form.
- iii- The appellatant has got no cause of action.
- iv- The appellatant has got no locus standi.
- v- The appellatant is estopped by his own conduct to file the present appeal.
- vi- The appeal is bad due to non-joinder of necessary parties.
- vii- The Appeal is time barred

FACTS OF THE CASE


Para-wise comments are furnished as under:-

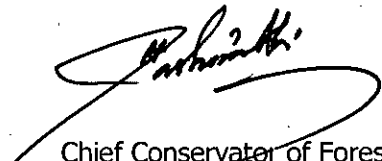
1. It pertains to the appellant's record, hence needs no comments.
2. Incorrect. On 18.12.2009 the appellant alongwith others was appointed as Deputy Ranger on **acting charge basis** on the Integrated Seniority List of Foresters of Abbottabad Circle vide CF, Abbottabad Circle office order no.91 dated 18.12.2009. As such appellant was not promoted.
3. No comments.
4. In correct. On creation of a regular post of D/Ranger the appellant has now been promoted to the rank of D/Ranger vide this office order No.3 dated 18.7.2014 **(Annex-I)**.
5. The contention of appellant is totally incorrect, as no pick and choose policy has been adopted by the department and all orders have been issued on merit and according to the rules and policy invoked at the time of promotion as submitted below:
 - a- It is correct that the appellant was senior to Muhammad Hanif Forester on the Integrated Seniority List of Foresters of Abbottabad Circle as it stood on 31.03.2009.
 - b- Previously, one combine seniority list of Foresters in Watershed Circle and Abbottabad Forest Circles was maintained but after bifurcation of Abbottabad Forest Circle into two circles i.e. Upper Hazara and Lower Hazara Forest Circles, the seniority list were maintained on the basis of three circles where the Foresters were initially appointed vide Notification No. SO(Estt:)Envr:/01-04/2K11/1629-50 dated 05.10.2012 **(Anne-II)**. It is, however, pertinent to mention that the appellant has never challenged the notification dated 5.10.2012.
 - c- Muhammad Hanif Forester being initially recruitee of Lower Hazara Forest Circle was taken up on the seniority list of Foresters of that Circles **(Annex-III)** whereas the appellant was taken up on the seniority list of Foresters of Watershed Circle **(Annex-IV)**.
 - d- On the recommendations of the DPC, the regularization order of Muhammad Hanif acting charge Deputy Ranger alongwith others was issued by CF, Lower Hazara Forest Circle vide his office Order No.12 dated 08.10.2013 on the basis of the availability of regular post of D/Ranger in Lower Hazara Forest Circle where as the appellant was not considered due to non availability of regular post of D/Ranger in the Circle where he was serving and therefore appellant has no locus standi to challenge the promotion order of above named official. Further more, the appellant has even not bothered to implead the other promoted parties in the instant appeal.


6. Incorrect. The departmental appeal of the appellant was rejected on merit and according to the rules as explained vide para "5" above.
7. Incorrect. The completion of probation period does not confer any right of regular promotion upon an official if vacant regular post is not available, as explained vide Para-5 above.
8. Incorrect as explained vide para-5 above.

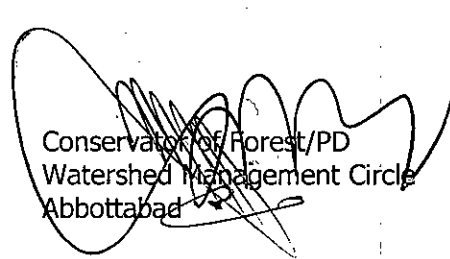
Prayers

In view of the aforementioned narrated facts on record, it is therefore, humbly prayed that the appeal being against the norms of justice, may kindly be dismissed with cost.


Secretary
Govt. of Khyber Pakhtunkhwa
Environment Department
Peshawar


Chief Conservator of Forests
Central Southern Forests Region-I
Khyber Pakhtunkhwa
Peshawar


Chief Conservator of Forests,
Northern Forest Region-II
Abbottabad


Conservator of Forest/ PD
Watershed Management Circle
Abbottabad

Annex


03
OFFICE ORDER No. ~~18~~ DATED ABBOTTABAD THE 18 /07/2014
ISSUED BY MUHAMMAD SIDDIQUE KHAN CONSERVATOR OF FORESTS/ PD,
WATERSHED MANAEMENT CIRCLE ABBOTTABAD

As recommended by Departmental Promotion Committee, in its meeting held on 10-06-2014 under the Chairmanship of Chief Conservator of Forests, Central Southern Forest Region-I Khyber Pakhtunkhwa Mr. Sultan Mehmood S/O Fida Muhammad acting charge Deputy Ranger is hereby promoted to the rank of **Deputy Ranger in BPS-11 (Rs. 6600-460-20400)** with immediate effect on regular basis against the existing vacancy of Deputy Ranger in Watershed Management Circle Abbottabad.

This order is purely temporary and will not confer any right for continuity on abolition of the posts and the official will be liable to reversion to original post without any notice.

The Deputy Ranger will be on probation for a period of one year in terms of section 6(2) of the NWFP Civil Servant ACT, 1973 read with rule 15(1) of the NWFP Civil Servant (Appointment, Promotion and Transfers) Rules, 1989.

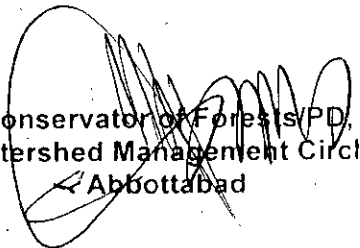
The Deputy Ranger is allowed to continue his services at the present place of posting till further orders.


Muhammad Siddique Khan
Conservator of Forests/ PD,
Watershed Management Circle
Abbottabad


Memo.

Copy forwarded to:

- 1- The Chief Conservator of Forests, Central Southern Forest Region-I Khyber Pakhtunkhwa Peshawar with reference to his letter No. 187-90/E dated 18-07-2014.
 - 2- The Chief Conservator of Forests, Northern Forest Region-II Abbottabad
- For favour of information please.
- 3- The conservator of Forests, Lower Hazara Forest Circle Abbottabad, Abbottabad for information and necessary action.
 - 4- The Divisional Forest Officer Kaghan Forest Division, Garhi Habibullah for information and necessary action.
 - 5- Mr. Sultan Mehmood Deputy Ranger C/O DFO, Kaghan Forest Division, Garhi Habibullah for information


Conservator of Forests/ PD,
Watershed Management Circle
Abbottabad

Attested


SUPERINTENDENT
Watershed Mgt Circle
Abbottabad



GOVERNMENT OF KHYBER PAKHTUNKHWA
ENVIRONMENT DEPARTMENT

Dated Pesh 5th Oct., 2012

Annex-I

NOTIFICATION

No.SO(Estt)Envt/I-4/2k11: In supersession of this department Notification No.SO(Estt)Envt/I-4/2k11/6475 dated 2/1/2012, the Competent Authority, in exercise of the powers vested vide item 1-6 Part-I of defunct West Pakistan Manual Volume-II, is pleased to order reconstitution/revision of the following Circles for the purpose of initial appointment of Foresters and Deputy Rangers and promotion of Foresters to the rank of Deputy Rangers, in each circle, on the basis of circle-wise seniority lists of the Foresters, with immediate effect.

#	Name of Circles constituted	Name of Circle
1	Upper Hazara Circle	Upper Hazara Circle
2	Lower Hazara Circle	Lower Hazara Circle
3	Malakand West Circle	Malakand West Circle
4	Malakand East Circle	Malakand East Circle
5	FATA Circle	FATA Circle
6	Southern Circle	Southern Circle
7	Watershed Management Circle	Watershed Management Circle
8	Forestry Planning & Monitoring Circle	Forestry Planning & Monitoring Circle

The seniority of the Foresters and Deputy Rangers shall be determined and fixed in the respective Circles on the basis of their initial appointment.

SECRETARY TO GOVT. OF
KHYBER PAKHTUNKHWA
ENVIRONMENT DEPARTMENT.

Dated Pesh: 5th Oct., 2012

Encls: No. SO(Estt)Envt/I-4/2k11/ **1629-50**

Copy is forwarded for information to:-

- 1) PS to Secretary Environment Department.
- 2) Chief Conservator of Forests, Central & Southern Forest Region-I, Peshawar.
- 3) Chief Conservator of Forests, Northern Forest Region-II, Abbottabad.
- 4) Chief Conservator of Forests, Malakand Forest Region-III, Mingora at Saidu Sharif, Swat.
- 5) All Conservators of Forests, Khyber Pakhtunkhwa C/O CCF-I; with the direction that tentative seniority lists of their respective circles may be issued by calling thereby objections within one months time period, if found no objection from any official(s), then final seniority lists may be issued accordingly.
- 6) All Directors Integrated Specialized Units, Forest Department.
- 7) Master file.
- 8) Officer order file.

No. 208 /E dated Abbottabad the 16 /10/2012.

Copy for information and immediate necessary action to the:

1. Conservator of Forests, Lower Hazara Forest Circle Abbottabad.
2. Conservator of Forests, Upper Hazara Forest Circle Mansehra.
3. Conservator of Forests, Watershed Management Circle Abbottabad.

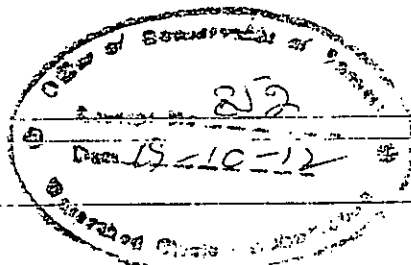
Please do the following:

- i. Circulate the above notification amongst all the DFOs of your respective circle.
- ii. Call the concerned Foresters and direct them to withdraw their appeals, who have preferred appeals in various courts.
- iii. Prepare synopsis of all concerned for promotion.

E.A

CFIPD

17/12



[Signature]
Chief Conservator of Forests
Northern Forest Region-II Abbottabad
Khyber Pakhtunkhwa

[Signature]

[Signature]
SUPERINTENDENT
Watershed Mgt Circle
Abbottabad.

**FINAL SENIORITY LIST OF FORESTERS IN RESPECT OF LOWER HAZARA FOREST CIRCLE, ABBOTTABAD
AS IT STOOD ON 31-08-2013**

S. #	Name of Forester	Qualification	Home District	Any test passed	Date of Birth	Date of appointment in		Cadre	Rem
						Govt. Service	Present grade.		
1	Muhammad Farooq	B.A	Mansehra	Trained	02-07-1956	19-08-1978	28-04-2008	Hazara Forestry Pre-investment Project Mansehra	App Rar bas
2	Mr. Mukhtiar Ahmad	F.A	Mansehra	-do-	05-12-1956	23-08-1978	23-08-1978	-do-	App Rar bas
3	Mr. Gul Zaman	Matric	Mansehra	-do-	19-01-1959	21-04-1979	28-04-2008	-do-	App Rar bas
4	Muhammad Hanif	M.A	Mansehra	-do-	01-02-1955	28-08-1978	18-12-2009	-do-	App Rar bas
5	Muhammad pervaiz S/O Ali Gohar	Matric	Mansehra	-do-	03-04-1959	03-03-1979	03-03-1979	Hazara Forestry Pre-investment Project Mansehra	BS
6	Taj Muhammad	Matric C. Com	Abbottabad	-do-	15-09-1955	06-04-1976	08-03-1979	Hazara Forestry Pre-investment Project Mansehra	B
7	Mr. Nisar Ahmad S/o Sanaullah Khan	M.A	Mansehra	-do-	01-05-1959	18-09-1979	18-09-1979	Hazara Forestry Pre-investment Project Mansehra	B
8	Muhammad Gulfam	Matric	Mansehra	-do-	24-03-1959	22-09-1979	22-09-1979	Hazara Forestry Cooperative Division	B
9	Mr. Nisar Ahmad S/O Muhammad Raza	F.A	Mansehra	-do-	06-04-1961	24-03-1981	24-03-1981	Hazara Forestry Cooperative Division	B
10	Mr. Tariq Javed Khurshid Khan	Matric B.A	Abbottabad	-do-	18-04-1956	06-06-1981	06-06-1981	Hazara Forestry Cooperative Division Mansehra	I
11	Mr. Baidar Bakht	Matric	Abbottabad	-do-	02-12-1963	05-12-1981	05-12-1981	Siran Forest Division	I
12	Muhammad Riasat S/O Mir Akbar	F.A	Mansehra	-do-	08-01-1953	15-01-1979	01-10-1984	Haripur Forest Division	J
13	Mr. Aurangzeb S/O Aziz-ur-Rehman	Matric	Mansehra	-do-	15-06-1963	01-10-1984	01-10-1984	Kaghan Forest Division	
14	Muhammad Anwar S/O Muhammad Roshan	Matric	Mansehra	-do-	06-09-1960	02-06-1979	29-10-1984	Kaghan Forest Division	
15					01-05-1958	27-08-1981	30-09-1985	Kaghan Forest Division	

SUPERINTENDENT
Watershed Mgt Circle
Abbottabad

Conservator of Forests
Lower Hazara Forest Circle
Abbottabad

16	Muhammad Javed S/O Mohib-ur-Rehman	F.A	Mansehra	Trained	15-04-1963	30-09-1985	30-09-1985	Kaghan Forest Division	BS
17	Mian Tahir Hussain Shah	B.A	Mansehra	-do-	05-02-1963	23-11-1986	23-11-1986	Siran Forest Division	BS
18	Sardar Mehmood	Matric	Mansehra	-do-	15-03-1954	03-05-1975	11-12-1986	Kaghan Forest Division	BS
19	Muhammad Fiaz	Matric	Mansehra	-do-	10-03-1961	12-03-1979	28-09-1989	Hazara Forestry Pre-investment Project Mansehra	BS
20	Muhammad Asif	B.A	Abbottabad	-do-	17-11-1967	04-11-1989	04-11-1989	Sarhad Forest School Thai	BS
21	Muhammad Luqman	F.A	Haripur	-do-	03-05-1970	23-05-1990	23-05-1990	Haripur Forest Division	BS
22	Mr. Abdur Rasheed	Matric	Abbottabad	-do-	07-01-1959	23-08-1977	01-07-1990	Patrol Squad Division	BS
23	Mr. Sajid Khan	B.A	Abbottabad	-do-	13-06-1970	01-10-1990	01-10-1990	Sarhad Forest School	BS
24	Muhammad Bashir S/O Arsala Khan	Matric	Mansehra	-do-	02-01-1957	20-11-1976	28-02-1993	Hazara Timber Extraction Division A'Abad	BS
25	Mr. Masood-ur-Rehman S/O Fazal-ur-Rehman	F.A	Mansehra	-do-	25-04-1960	27-04-1976	18-01-1997	Siran Forest Division	BS
26	Mr. Shad Muhammad	Matric	Mansehra	Un-trained	06-05-1956	28-04-1975	07-04-1997	Kaghan Forest Division	BS
27	Syed Farooq Shah	Matric	Abbottabad	Trained	06-02-1956	17-11-1973	26-04-2002	Galis Forest Division	BS
28	Muhammad Daud	Matric	Abbottabad	Un-trained	02-04-1953	26-07-1975	26-04-2002	Galis Forest Division	BS
29	Muhammad Sadiq	Matric	Haripur	Trained	15-03-1957	17-11-1975	16-07-2002	Haripur Forest Division	BS
30	Muhammad Iqbal S/O Mir Muhammad	Matric	Mansehra	-do-	05-07-1956	24-04-1976	16-07-2002	Kaghan Forest Division	BS
31	Mr. Arif Hussain S/O Khushal Khan	Matric	Mansehra	-do-	16-06-1954	20-11-1976	16-07-2002	Hazara Timber Extraction Division Abbottabad	BS
32	Mr. Raza Muhammad	Matric	Abbottabad	-do-	01-08-1966	09-01-1990	19-07-2004	Patrol Squad Division	BS
33	Mr. Afrasiab	Matric	Abbottabad	-do-	01-01-1959	08-04-1976	11-02-2005	Haripur Forest Division	BS
34	Muhammad Ajab S/O Gulzar Ahmad	F.A	Abbottabad	-do-	11-04-1953	26-07-1975	15-02-2005	Galis Forest Division	BS
35	Muhammad Ramzan	Under Matric	Abbottabad	Trained	21-09-1954	26-07-1975	15-02-2005	Galis Forest Division	BS
36	Mr. Mian Khan	Middle	Abbottabad	Un-trained	08-06-1953	19-02-1976	15-02-2005	Galis Forest Division	BS
37	Muhammad Younis S/O Ahmad Khan	Matric	Mansehra	Trained	15-04-1958	11-07-1975	12-04-2006	Siran Forest Division	BS
38	Mr. Iltaf Hussain	Matric	Mansehra	Un-Trained	12-05-1953	03-05-1976	12-04-2006	-do-	BS
39	Mr. Taj Muhammad S/O Haji Abdul Khanan	Matric	Mansehra	Trained	09-09-1958	20-11-1976	12-04-2006	Hazara Timber Extraction Division A'Abad	BS
40	Muhammad Naseem	Matric	Mansehra	Un-trained	01-04-1956	10-07-1977	25-09-2007	Kaghan Forest Division	BS
41	Muhammad Imtiaz	Under Matric	Haripur	-do-	20-04-1960	18-12-1976	27-09-2007	Haripur Forest Division	BS
42	Syed Iltaf Hussain Shah	Matric	Mansehra	-do-	21-06-1959	26-06-1977	18-01-2008	Hazara Timber Extraction Division Abbottabad	BS

Attested

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**FINAL SENIORITY LIST OF DEPUTY RANGERS/FORESTERS IN RESPECT OF WATERSHED MANAGEMENT CIRCLE
ABBOTTABAD as it stood on 31.12.2012.**

Annex-IV

Sl. No.	Name	Qualification	Place of Birth	Training	Date of Birth	Service Date	Grade	Posting	Circle	Remarks
1	Saif-uz-Zaman Khan	✓ Matric	Mansehra	Trained	1/5/1954	11/11/1975	28/04/2008	Daur Watershed Division	Upper Hazara Circle	Forest Officer
2	M. Iqbal-Ul-Rehman	✓ Matric	Mansehra	Trained	20/6/1954	26/10/1977	29/04/2008	Watershed Circle	Lower Hazara Circle	Forest Officer
3	Zameer Gul	✓ B.A	Bunair	Trained	1/4/1964	18/3/1985	18/12/2009	Buner Watershed Division	Watershed Circle	Range Officer
4	Sultan Mehmood	✓ B.A	Mansehra	Trained	8/4/1958	26/8/1978	18/12/2009	Watershed Circle	Upper Hazara Circle	Range Officer
5	Shabir Ahmed	B.A	Mansehra	Trained	28/4/1960	13/9/1978	13/09/1978	Daur Watershed Division	Lower Hazara Circle	Forest Officer
6	Muhammed Nazir	Matric	Mansehra	Trained	5/2/1961	27/5/1979	27/05/1979	Shan Watershed Mansehra	Watershed Circle	---do---
7	Muhammed Iqbal	Matric	Mansehra	Trained	1/4/1953	12/11/1975	01/11/1981	Daur Watershed Division	Lower Hazara Circle	---do---
8	Muhammed Sharif	Matric	Mansehra	Trained	15/1/1956	1/6/1976	01/11/1981	Unnar Watershed Division	Upper Hazara Circle	---do---
9	Abid Hussain	B.A	Mansehra	Trained	15/4/1961	23/11/1981	23/11/1981	Kunhar Watershed Division	Lower Hazara Circle	---do---
10	Gulfranz-II	Matric	Shangla	Trained	11/10/1954	1/1/1983	01/01/1983	Kohistan Watershed Division	Upper Hazara Circle	---do---
11	Nisamat Ullah	Matric	Shangla	Trained	12/2/1954	1/1/1983	01/01/1983	Kohistan Watershed Division	Watershed Circle	---do---
12	Shujat Ali	B.A	Shangla	Trained	10/2/1963	1/11/1983	01/11/1983	Kohistan Watershed Division	Watershed Circle	---do---
13	Abdul Razaq	Matric	Shangla	Trained	6/6/1953	6/1/1985	06/01/1985	Kohistan Watershed Division	Watershed Circle	---do---
14	Gul Rehman	BSc Forestry	Bunair	Trained	1/1/1965	13/3/1985	13/03/1985	Buner Watershed Division	Watershed Circle	---do---
15	Haider Zaman	Matric	Abbottabad	Trained	12/1/1953	30/6/1974	11/08/1985	Daur Watershed Division	Watershed Circle	---do---
16	Muhammed Shamraz	D.Com	Abbottabad	Trained	12/12/1972	22/10/1991	22/10/1991	Sokta Nullah Project	Watershed Circle	---do---
17	Kamran Khan	BSc Forestry	Abbottabad	Trained	1/5/1970	1/10/1992	01/10/1992	Hazara Social Forestry	Lower Hazara Circle	---do---
18	Hazrat Rehman	Matric	Bunair	Trained	4/4/1957	3/7/1982	17/10/1992	Buner Watershed Division	Watershed Circle	---do---
19	Mushtaq Ahmed	Under Matric	Abbottabad	Trained	10/4/1954	1/4/1976	15/12/2002	Daur Watershed Division	Watershed Circle	---do---
20	Mukhtiar Alam	Under Matric	Abbottabad	Trained	20/1/1958	6/4/1977	15/12/2002	Daur Watershed Division	Watershed Circle	---do---
21	Afrat Ali	B.A	Battagram	Un trained	1/1/1958	2/9/1977	22/06/2010	Unnar Watershed Division	Watershed Circle	---do---
22	Syed Noor Habib Shah	Middle	Battagram	Un trained	2/1/1955	21/2/1977	28/03/2011	Unnar Watershed Division	Watershed Circle	---do---
23	Sar Zameen	Matric	Bunair	Un trained	20/11/1958	13/2/1985	17/09/2011	Buner Watershed Division	Watershed Circle	---do---
24	Liaqat Ali	Matric	Mansehra	Un trained	24/5/1956	22/8/1977	14/01/2012	Kunhar Watershed Division	Lower Hazara Circle	---do---

Conservator of Forests/PD
Watershed Management Circle
Abbottabad

Attested
[Signature]
SUPERINTENDENT
Watershed Mgt Circle
Abbottabad

1

2

**BEFORE THE KHYBER PAKHTUNKHWA,
PESHAWAR.**

Sultan Mehmood Acting Deputy Ranger Garhi Habibullah Forest Range Kaghan
Forest Division Garhi Habibullah.

....APPELLANT

V E R S U S

Province of KPK through Secretary Environment Department Peshawar and other.

....RESPONDENTS / DEFENDANTS

**REJOINDER TOWARDS THE WRITTEN
STATEMENT OFFERED BY THE
RESPONDENTS.**

Respectfully Sheweth,

*That the replication of reply of the respondents **IS**
submitted as under:-*

PRELIMINARY OBJECTION

1. This para of reply is wrong the appeal is within time.
2. This para of the reply is also wrong the appeal is maintainable in the present form.
3. This para of reply is wrong, denied, the appellant has got cause of action.
4. This para of reply is wrong, denied the appellant has got legal right to bring his appeal before this Honourable Forum.
5. This para of reply is wrong, denied.

6. This para of reply is wrong and denied, all the necessary parties have been impleaded.
7. This para of reply is wrong, denied and appeal was within time.

FACT OF THE CASE

Para wise replication regarding facts is submitted as under:-

- 1) The respondents have not given any reply hence need not to be replicated.
- 2) As the department already admitted that I was promoted D/Ranger 18.12.2009 by the DPC.
- 3) Need not be replicated as this para admitted by respondent, it is correct.
- 4) It is replicated that the answer of the respondents is incorrect while the para of the appeal is correct. Hence the reply of this Para is wrong therefore denied.
- 5) In reply to the Para No.5 of the reply of the respondents, it is submitted that the reply of the respondents is wrong. Hence denied, it is further submitted that respondents on the one hand accept the Para of appeal as correct and on the other hand resile the same facts, therefore the contentions of the

respondents are denied. It is further submitted regarding the parts of para No.5 as under:-

(a) The contention taken in this part of the para is correct, which means that the respondent admit the contention of the appellant.

(b) In reply to this part of the paragraph No.5 of the reply, it is clear that respondents have violated and changed the seniority system against the law in this way they committed injustice to the appellant. Hence this para of fact of reply is denied.

(c) In reply of this Part of Para No.5 of the respondent it is submitted that this bifurcation of seniority is illegally done which is not applicable for the D/Ranger it was only for Cadre of Foresters while the appellant is among the Cadre of Rangers. Therefore this part of the Para is wrong, hence denied.

(d) In reply to this Part of the reply of respondents it is submitted that at the very time appellant has deserved and attained all the qualifications to be posted Forester against the vacant post, which the respondents willfully ignored and committed injustice to the appellant. Hence this part of the Para 5 of reply is wrong and denied.


- 6) The Reply of Para No.6 is totally wrong and further added that much has been replicated in Para No.5 of the reply above please.
- 7) This para of reply is also wrong, therefore, denied, while the Para of appeal is correct.
- 8) The contents of this para are also wrong and denied, while the para of the appeal is correct.

In view of the above replication it is submitted that the appeal of appellant may graciously be accepted as prayed for. It is also prayed that the reply of the respondent is defective and is liable to be ignored because of the fact reply of respondent is not verified on oath as no affidavit is given hence it is not to be considered as legal.


**SULTAN MEHMOOD
(PETITIONER)**

Through:

Dated: 17/04/2017


(SYED MEHBOOB AHMED SHAH)
Advocate High Court, Abbottabad.
SYED MAHBOOB AHMAD SHAH
Professor, M.A LL.B.
Advocate High Court
Abbottabad

BEFORE THE KHYBER PAKHTUNKHWA,
PESHAWAR.

Sultan Mehmood

....APPELLANT

V E R S U S

Province of KPK through Secretary and others

....RESPONDENTS / DEFENDANTS

REJOINDER

AFFIDAVIT

I, *Sultan Mehmood Acting Deputy Ranger Garhi Habibullah Forest Range Kaghan Forest Division Garhi Habibullah petitioner/ appellant*, do hereby solemnly affirm and declare on Oath that the contents of instant *replication* are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

DEPONENT

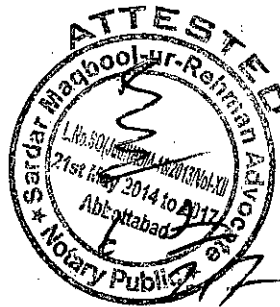
Sultan Mehmood
SULTAN MEHMOOD
D / Ranger

Dated: - 17/04/2017

IDENTIFIED BY:-

Nahid
(SYED MEHBOOB AHMED SHAH)
Advocate High Court,
Abbottabad.

SYED MAHBOOB AHMAD SHAH
Professor, M.A LL.B.
Advocate High Court
Abbottabad



وکالت نامہ

کورٹ فیس

3
20/8
بعدالت

BEFORE THE KPK SERVICE TRIBUNAL

عنوان: Provincia of KPK othus نام
Sultan Mahmood Acting Dy. Secy

منجانب: APPELLANT

Service Appeal

نوعیت مقدمہ:

باعتث تحریر آنکہ

Accepted

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کارروائی متعلقہ آں مقام
LUBNA KHAN ADVOCATE.

ABDUL REHMAN QADIR ASS HADID

کوڈیکل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر فائٹ و فیصلہ برہتف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کارروائی کے لئے کسی اور وکیل یا مفار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پر داخستہ مجھ کو منظور قبول ہوگا۔ دوران مقدمہ جو فرچہ و ہر جانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مفار مقرر کردہ میں کوئی جزو بتایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست براد تجارت باشر، بیضہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

Accepted

Abdul Rehman Qadir
Advocate

المقوم: 20/8/20

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

بمقام: ABDUL REHMAN QADIR

Accepted

LUBNA KHAN

Advocate LUBNA KHAN

SULTAN MAHMOOD