


27.07.2022

Counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Farhan Alam, SDO for official respondents present. No one present on behalf of private respondents.

*Due to non-availability of postal tickets private respondents were not put on Notice please.*

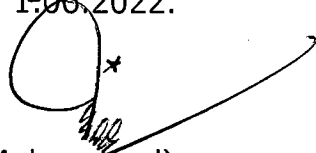
Written reply/comments on behalf of the respondents No. 1 to 3 submitted. Due to lack of funds notices were not issued to private respondents. Fresh notices be issued to the private respondents No. 4 to 13 for submission of written reply/comments. To come up for reply/comments on 02.09.2022 before S.B.

  
(Fareeha Paul)  
Member (E)

17.05.2022

Appellant in person present. Mr. Muhammad Adeel Butt, Addl. AG alongwith Mr. Noor Sher S.O (Litigation) and Muhammad Zeeshan SDO for the respondents present.

Written reply/comments on behalf of respondent not submitted. Representative of the respondents requested for time to submit written reply/comments. To come up for written reply/comments on 10.06.2022.

  
(Mian Muhammad)  
Member (E)

10.06.2022

Appellant in person present.

Muhammad Riaz Khan Paindakheil learned Assistant Advocate General alongwith Farhan Alam SDO for official respondents No.1 to 3 present.

Reply on behalf of official respondents No.1 to 3 submitted. Lawyers are on strike, therefore, nemo for private respondents No.4 to 13. All the private respondents be put on notice for submission of reply for the next date.

Adjourned to 27.07.2022 for reply/comments, before S.B.

  
(Rozina Rehman)  
Member (J)

09.08.2021

Counsel for the appellant present: Preliminary arguments heard.

The matter include in the present appeal relates to seniority. Therefore, the appeal is admitted for full hearing, subject to all just and legal objections including that of limitation for determination during full hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 15.12.2021 before the D.B.

*9/8/21*

*[Signature]*  
Chairman

15.12.2021

Appellant in person present. Mr. Kabirullah Khattak, Addl: AG for respondents present.

Written reply/comments on behalf of respondents not submitted. Learned AAG seeks time to contact the respondents for submission of written reply/comments. Notices be issued to the private respondents. Last opportunity granted. To come up for written reply/comments on 02.03.2022 before D.B.

*2-3-2022*

*Due to retirement of the Honble Chairman the case is adjourned before on 17-5-2022*

*[Signature]*  
Reader

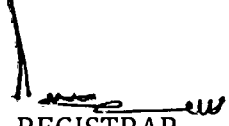

*[Signature]*  
(MIAN MUHAMMAD)  
MEMBER (E)

Form- A

FORM OF ORDER SHEET

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

Case No.- 6583 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	22/06/2021	<p>The appeal of Mr. Shaukat Hussain resubmitted today by Mr. Taimur Ali Khan Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>09/08/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

The appeal of Mr. Shaukat Hussain Sub-Engineer Irrigation Department Peshawar received today i.e. on 01/03/2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of seniority list stood on 31.12.2019 mentioned in para-5 of the memo of appeal is not attached with the appeal which may be placed on it.
- 2- In the memo of appeal many places have been left blank which may be filled up.
- 3- Appeal has not been flagged/marked annexures' marks.
- 4- Annexures of the appeal may be attested.
- 5- Fifteen more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 409 /S.T,

Dt. 02/03 /2021

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Taimur Ali Khan Adv. Pesh.

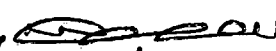
Respected Sir,

15 more days may kindly be catered for  
submission of appeal



16/03/2021

15 days time further extended.

  
16/3/2021

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

APPEAL NO. 6583 /2021

Shaukat Hussain

V/S

Irrigation Department

**INDEX**

S.NO.	Documents	Annexure	Page No.
1.	Memo of appeal	-----	01-04
2.	Copy of relevant rule	A	05
3.	Copy of seniority list 2004	B	06-08
4.	Copy of seniority list of 2020	C	09-18
5.	Copy of departmental appeal	D	19-20
6.	Copy of rejection order dt: 04.02.2021	E	21
7.	Vakalat Nama	-----	22

APPELLANT

THROUGH:

**(M. ASIF YOUSAFZAI)**  
**ADVOCATE SUPREME COURT,**  
**&**

**(TAIMUR ALI KHAN)**  
**ADVOCATE HIGH COURT,**

Room No. Fr-8, 4<sup>th</sup> Floor,  
Bilour Plaza, Peshawar Cantt:  
Contact No. 03339103240

1

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

APPEAL NO. \_\_\_\_\_/2021

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 3258

Dated 01/03/2021

Mr. Shukat Hussain, Sub Engineer,  
Irrigation Department, Peshawar.

(APPELLANT)

**VERSUS**

1. The Secretary, Government of Khyber Pakhtunkhwa, Irrigation Department, Peshawar.
2. The Chief Engineer (South) Irrigation Department, Peshawar.
3. The Superintending Engineer Peshawar, Irrigation Circle Peshawar.
4. Mr. Muhammad Ashraf, SDO (OPS), Rodkahi Irrigation Division, D.I. Khan.
5. Mr. Syed Mehr Ali Shah, Sub Engineer, Flood Irrigation Division, D.I. Khan.
6. Mr. Imtiaz Ahmad, Sub Engineer, Swabi Irrigation Division, Swabi.
7. Mr. Abdur Rehman, Sub Engineer, Kohat Irrigation Division, Kohat.
8. Mr. Naveed Ahmad, Sub Engineer, Hydrology Irrigation Division, Peshawar.
9. Mr. Azhar Qayum, Sub Engineer, CRBC Irrigation Division, D.I. Khan.
10. Mr. Fida Mohammad, Sub Engineer, Swat Irrigation Division, Swat.
11. Mr. Haroon-ur Rashid, Sub Engineer, Swat Irrigation Division, Swat.
12. Mr. Malik Abdul Waheed, Sub Engineer Paharpur Irrigation Division D.I. Khan.
13. Mr. Iftikhar Ahmad, Sub Engineer, Peshawar Canals Division Peshawar.

**Filed to-day**  
**Registrar**  
**01/03/2021**

(RESPONDENTS)

2

**APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNALS ACT, 1974 AGAINST THE IMPUGNED SENIORITY LIST DATED 26.06.2020 ACKNOWLEDGED BY THE APPELLANT ON 31.07.2020, WHEREBY THE APPELLANT WAS WRONGLY PLACED AT SERIAL NO.61 AND AGAINST THE ORDER DATED 04.02.2021 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS REJECTED FOR NO GOOD GROUNDS.**

**PRAYER:**

**THAT ON THE ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 04.02.2021 MAY KINDLY BE SET-ASIDE AND THE RESPONDENTS MAY KINDLY BE DIRECTED TO PLACE THE APPELLANT AT HIS PROPER PLACE ON AT SERIAL NO.47 ABOVE THE PRIVATE RESPONDENTS BY RECTIFYING/CORRECTING THE IMPUGNED SENIORITY LIST ISSUED ON 20.06.2020 STOOD ON 31.12.2019. ANY OTHER REMEDY WHICH THIS HONOURABLE TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.**

**RESPECTFULLY SHEWETH:**

**FACTS:**

1. That the appellant was appointed as Tracer in the year 1990 and with the passage of time promoted to the post Draftsman in the year 1995 and since his performing his duty with great devotion and honest whatsoever, assigned to him no complaint has been filed against him regarding his performance.
2. That the respondent department amended its rules in year 2003 through notification dated 15.08.2003, wherein fifteen percent by promotion on the basis of seniority-cum-fitness from amongst members of service holding posts of Canal Inspector, Work taker, Drawing Establishment and Mechanical, having Diploma of Associate Engineering from a Recognized Institute of Pakistan/Board of Technical Education with at least ten (10) years service, passed the prescribed Departmental Examination. (Copy of relevant rule is attached as Annexure-A)



3. The in response of rules combined seniority list of Canal Inspector, Work taker, Drawing Establishment and Mechanical, having Diploma of Associate Engineering from a Recognized Institute of Pakistan/Board of Technical Education of irrigation department was issued on 30.06.2004, whereby the appellant was at Serial No.8 in that seniority list, while the private respondents from Sr.4 to 13 were below than the appellant in that seniority list. **(Copy of seniority list dated 30.06.2004 is attached as Annexure-B)**
4. That on the basis of that seniority list, the private respondent No.4 to 13 were promoted to the post Sub Engineers in the year 2004, while the appellant was deferred due to not passing departmental B Exam, however the appellant also passed departmental B exam and also promoted to Sub Engineer in the year 2006.
5. That the respondent department issued final seniority list of Sub Engineer issued on 26.06.2020 stood on 31.012.2019, wherein the appellant was shown as at Sr. No 61, while the private respondents were shown at Sr. No. 47, 48 52, 54, 55, 56, 57, 58, 59 and 60 respectively and the appellant got acknowledgment of that seniority list on 31.07.2020, being aggrieved from that seniority list the appellant filed departmental appeal on 25.08.2020, which was rejected on 04.02.2021 **(Copies of seniority list 2020, departmental appeal and rejection order are attached as Annexure-C,D&E)**
6. That now the appellant has no other remedy except to file the present service appeal for redressal of his grievances in this Honourable Tribunal on the following grounds amongst others.

**GROUND:**

- A) That impugned seniority list dated 26.06.2020 and rejection order dated 04.02.2021 are against the law, facts, norms of justice, material on record, therefore, not tenable and order dated 04.02.2021 liable to be set-aside, while the impugned seniority list is liable to revised/modified to the extent that the appellant may properly be placed at Sr. No.47 above the private respondents.
- B) That the appellant was deferred from promotion to the post of sub Engineer in the year 2004 due to not passing departmental-B Exam and after passing departmental-B Exam, he was also promoted in the

(4)

year 2006, therefore the appellant is entitle to be placed at Sr. No 47 above the private respondents as per provision III of civil Servant KP (APT) Rules 1989 in the impugned seniority list, therefore the impugned seniority list is liable to rectified/corrected to the extent that the appellant may properly be placed at Sr. No.47 above the private respondents.

- C) That appellant will deprive from his legal right of future promotions by placing wrongly in the impugned seniority list, which will cause irreparable loss to the appellant in shape pension and other monetary benefits.
- D) That the appellant has not been treated in accordance with law and rules and has been deprived from his right place of seniority in the impugned seniority list by the arbitrary manner of the respondent department.
- E) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

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

APPELLANT  
Shaukat Hussain

THROUGH:

**M. ASIF YOUSAFZAI**  
**ADVOCATE SUPREME COURT**

**S .NOMAN ALI BUKHRI**  
**ADVOCATE HIGH COURT**

**TAIMUR ALI KHAN**  
**ADVOCATE HIGH COURT,**

**&**

**SHAHKAR KHAN YOUSAFZAI**  
**ADVOCATE**

**ASAD MEHMOOD**  
**ADVOCATE HIGH COURT**

**NOTIFICATION**

Dated, Peshawar, the 15<sup>th</sup> August, 2003

A  
5

No. SOE/Irr/23/5/73. In pursuance of the provisions contained in sub-rule (2) of rule 3 of the North-West Frontier Province Government Servants (Appointment, Promotion & Transfer) Rules, 1989, the Irrigation & Power Department, in consultation with the Establishment Department and the Finance Department, hereby directs that in the North-West Frontier Province Irrigation and Public Health Department (Recruitment and Appointment) Rules, 1979, the following further amendment shall be made, namely:

**AMENDMENT**

In the Schedule, in column 7 against serial 10, for the existing entry the following shall be substituted, namely:

- (i) Eighty per cent by initial recruitment. ✓
- (ii) Fifteen per cent by promotion, on the basis of seniority-cum-Fitness, from amongst members of service holding posts of Canal Inspector, Work Taker, Drawing Establishment and Mechanical, having Diploma of Associate Engineering from a Recognized Institute of Pakistan/Board of Technical Education with at least ten (10) years service, passed the prescribed Departmental Examination; and
- (iii) Five per cent by promotion, on the basis of seniority-cum-fitness, from amongst members of service holding posts of Canal Inspector, Work Taker, Work Munshi & Work Superintendent with at least fifteen (15) years service, who have passed the prescribed Departmental Examination.

Secretary to Government  
of the North-West Frontier Province,  
Irrigation & Power Department

Dated: 15/08/2003

Copy forwarded to the:-

1. Administrative Secretaries to Govt. of NWFP
2. Secretary to Government, NWFP Peshawar
3. Secretary to Chief Minister, NWFP Peshawar
4. Secretary to Chief Secretary, NWFP Peshawar
5. Chief Engineer (W&M), Irrigation Department
6. Chief Engineer (Dev.), Irrigation Department
7. Manager Government Printing Press, Peshawar, for publication in the next issue of Government Gazette
8. Secretary, Public Service Commission Peshawar
9. Section Officer (R-V), Establishment & Administration Department Peshawar
10. Assistant Legal Drafter-II, Law Department Peshawar

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Handwritten initials and date: K13, 18/08

Handwritten signature at the bottom right.

TENTATIVE SENIORITY LIST OF CANAL INSPECTORS, WORK TAKERS, DRAWING ESTABLISHMENT AND MECHANICAL  
HAVING DIPLOMA OF ASSOCIATE ENGINEERING FROM A RECOGNIZED INSTITUTES / BOARDS OF TECHNICAL EDUCATION  
OF THE IRRIGATION DEPARTMENT NWFP AS STOOD ON 30-6-2004

SL: NO	NAME OF OFFICIAL WITH QUALIFICATION	DATE OF BIRTH	DATE OF IST ENTRY INTO GOVT: SERVICE	REGULAR APPOINTMENT TO THE PRESENT POST		METHOD OF RECRUITMENT / APPOINTMENT	PRESENT APPOINTMENT WITH DATE	REMARKS
				DATE	BPS			
1	Mr. Inamullah Foreman 1. Diploma of Associate Engineering in Mechl: Tech: 2. Passed Deptl: B Grade Examn: on 12-6-2004	4-3-1964	15-3-1986	15-3-1986	5	By initial recruitment	Foreman 15-3-1986	Attached to Paharpur Irrigation Division DIKhan
2	Mr. Hafizullah Mechanic Diploma of Associate Engineering in Mechl: Tech:	8-10-1963	3-3-1987	3-3-1987	5	-do-	Mechanic 3-3-1987	-do-
	Mr. Khan Badshah Charge Mechanic Diploma of Associate Engineering in Civil Tech:	1-6-1965	19-3-1987	19-3-1987	5	-do-	Charge Mechanic	Attached to Warsak Canals Divn: Peshawar
4	Mr. Muhammad Idrees Mechanic Diploma of Associate Engineering in Mechl: Tech:	27-4-1964	4-5-1987	4-5-1987	5	-do-	Mechanic 4-5-1987	Attached to Paharpur Irrigation Div: DIKhan
5	Mr. Imtiaz Ahmad Canal Inspector 1. Diploma of Associate Engineering in Civil Tech: 2. Passed Deptl: B Grade Exmn: on 12-6-004	14-1-1961	11-5-1987	11-5-1987	5	-do-	Canal Inspector 11-5-1987	Attached to Swabi Irrigation Division Swabi
6	Mr. Siyar Ahmad Operator Drilling Rig Diploma of Associate Engineering in Mechl: Tech:	9-8-1962	18-7-1987	18-7-1987	5	-do-	Operator Drilling Rig 18-7-1987	Attached to Mechanical Irrigation Division Peshawar
7	Mr. Muhammad Arif Draftsman 1. Diploma of Associate Engineering in Civil Tech: 2. Passed Deptl: B Grade Exmn: on 12-6-004	5-10-1965	3-1-1989	3-1-1989	10	-do-	Draftsman 3-1-1989	Attached to Chitral Irrigation Division Chitral
8	Mr. Shaukat Hussain Draftsman Diploma of Associate Engineering in Mechl: Tech:	4-12-1966	3-3-1990	3-3-1990	10	-do-	Draftsman 3-3-1990	-do-
9	Mr. Muhammad Ashfaq Draftsman Diploma of Associate Engineering in Mech: Tech:	15-4-1967	2-2-1991	2-2-1991	10	-do-	Draftsman 28-1-1991	Attached to F&D Division Timergara
10	Mr. Aamir Mehmood Work Munshi 1. Diploma of Associate Engineering in Civil Tech: 2. Passed Deptl: B Grade Exmn: on 12-6-004	1-10-1967	14-12-1991	14-12-1991	5	-do-	Work Munshi 14-12-1991	Attached to Paharpur Irrigation Division DIKhan
11	Mr. Nizamul Haq Canal Inspector 1. Diploma of Associate Engineering in Civil Tech: 2. Passed Deptl: B Grade Exmn: on 12-6-004	9-5-1965	6-8-1992	6-8-1992	5	-do-	Canal Inspector 6-8-1992	Attached to Swat Irrigation Division Swat

12	Mr. Anwar Hayat Draftsman Diploma of Associate Engineering in Civil Tech:	1-3-1970	10-8-1992	10-8-1992	10	-do-	Draftsman 10-8-1992	Attached to F&D Division Peshawar
13	Mr. Abdur Rehman Tracer 1. Diploma of Associate Engineering in Civil Tech:0 2. Passed Deptl: B Grade Exmn: on 12-6-004	15-4-1968	15-8-1992	15-8-1992	5	-do-	Tracer 15-8-1992	Attached to Kohat Irrigation Division Kohat
14	Mr. Abdul Jabbar Tubewell Operator Diploma of Associate Engineering in Mechl: Tech:	28-2-1973	17-1-1993	17-1-1993	4	-do-	Tube well Driver 17-1-1993	Attached to Paharpur Irrigation Division DIKhan
15	Mr. Muhammad Tufail Mechanic Diploma of Associate Engineering in Mechl: Tech:	18-10-70	19-9-1994	19-9-1994	5	-do-	Mechanic 19-9-1994	Attached to Kohat Irrigation Div: Kohat
16	Malik Abdul Waheed Work Munshi 1. Diploma of Associate Engineering in Civil Tech: 2. Passed Deptl: B Grade Exmn: on 12-6-004	15-5-1972	30-10-1994	30-10-1994	5	-do-	Work Munshi 30-10-1994	Attached to CRBC Irrigation Division DIKhan
17	Mr. Sajid Nawaz Tracer Diploma of Associate Engineering in Civil Tech:	12-4-1969	4-1-1995	4-1-1995	5	-do-	Tracer 4-1-1995	Attached to SIS Division Kohat
18	Mr. Waheed Ahmad Tracer 1. Diploma of Associate Engineering in Civil Tech: 2. Passed Deptl: B Grade Examn; on 12-6-2004	10-4-1971	5-1-1995	5-1-1995	5	-do-	Tracer 5-1-1995	Attached to F&D Division Peshawar
19	Mr. Azhar Qayum Tracer 1. Diploma of Associate Engineering in Civil Tech: 2. Passed Deptl: B Grade Examn: on 12-6-004	30-9-1973	8-1-1995	8-1-1995	5	-do-	Tracer 8-1-1995	Attached to CRBC Irrigation Division DIKhan
20	Mr. Shaukat Hayat Tracer Diploma of Associate Engineering in Civil Tech:	18-5-1972	12-1-1995	12-1-1995	5	-do-	Tracer 12-1-1995	Attached to F&D Division DIKhan
21	Mr. Muniruddin Tracer Diploma of Associate Engineering in Civil Tech:	10-8-1968	15-1-1995	15-1-1995	5	-do-	Tracer 15-1-1995	Attached to Tubewell Irrigation Div: Pesh:
22	Mr. Fazal Maula Tracer Diploma of Associate Engineering in Civil Tech:	20-1-1969	22-1-1995	22-1-1995	5	-do-	Tracer 22-1-1995	Attached to Swat Irrigation Div: N: Swat
23	Syed Sajjad Haider Foreman Diploma of Associate Engineering in Civil Tech:	18-4-1971	30-1-1995	30-1-1995	5	-do-	Foreman 30-1-1995	Attached to Mechanical Irrigation Divn: Pesh:
24	Mr. Fida Muhammad Tracer 1. Diploma of Associate Engineering in Civil Tech: 2. Passed Deptl: B Grade Exmn: on 12-6-004	16-4-1973	1-2-1995	1-2-1995	5	-do-	Tracer 1-2-1995	Attached to Swat Irrigation Division Swat
25	Mr. Haroonur Rashid Canal Inspector 1. Diploma of Associate Engineering in Civil Tech: 2. Passed Deptl: B Grade Exmn: on 12-6-004	1-4-1974	27-3-1995	27-3-1995	5	-do-	Canal Inspector 27-3-1995	Attached to Swabi Irrigation Division Swabi

26	Mr. Abdul Jabbar Electrician Diploma of Associate Engineering in Civil Tech:	20-1-1970	4-5-1995	4-5-1995	5	-do-	Electrician 4-5-1995	Attached to CRBC Irrigation Div: DIKhan
27	Mr. Iftikhar Ahmad Tracer 1. Diploma of Associate Engineering in Civil Tech: 2. Passed Deptl: B Grade Exmn: on 12-6-004	20-3-1972	12-6-1995	12-6-1995	5	-do-	Tracer 12-6-1992	Attached to Peshawar Canals Division Peshawar
28	Mr. Muhammad Shafiq Canal Inspector Diploma of Associate Engineering in Civil Tech:	24-3-1969	20-7-1994	15-6-1995	5	-do-	Canal Inspector 15-6-1995	Attached to Kohat Irrigation Divn: Kohat
29	Mr. Azam Khan Tracer Diploma of Associate Engineering in Civil Tech:	2-4-1967	19-6-1995	19-6-1995	5	-do-	Tracer 19-6-1995	Attached to Hazara Irr: Division Abbottabad
30	Mr. Muhammad Riazullah Canal Inspector Diploma of Associate Engineering in Civil Tech:	15-4-1976	19-7-1995	19-7-1995	5	-do-	Canal Inspector 19-7-1995	Attached to Mardan Irrigation Div: Mardan
31	Syed Ziaul Hassan Surveyor 1. Diploma of Associate Engineering in Mechl: Tech: 2. Passed Deptl: B Grade Exmn: on 12-6-004	16-3-1973	21-5-1996	21-5-1996	5	-do-	Surveyor 21-5-1996	Attached to Kohat Irrigation Div: Kohat
32	Mintiaz Ahmad Canal Inspector Diploma of Associate Engineering in Civil Tech:				5	-do-	Canal Inspector	Attached to Swabi Irrigation Divn: Swabi

ADMINISTRATIVE OFFICER  
PHONE NO. 9212118

19/7/04  
19/7/04

GOVERNMENT OF KHYBER PAKHTUNKHWA IRRIGATION DEPARTMENT.  
OFFICE OF THE CHIEF ENGINEER(SOUTH) IRRIGATION DEPARTMENT PESHAWAR.

**NOTIFICATION**

NO. 2414/AB/3-E (iii)

Dated Peshawar the 26/06/2020  
In pursuance of the Section-8 of the Kyber Pakhtunkhwa Civil Servants Act 1973 read with Rule-17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989, the Final Seniority list of Diploma holder/non diploma holder Sub Engineers of Irrigation Department as stood on 31-12-2019 is hereby notified/circulated for general information

#	Name of Sub Engineer with Academic Qualification	Date of Birth	Domicile	Date of 1st Entry into Govt Service	Regular Appointment / Promotion			Present Appointment	Remarks
					Dated	BPS	Method of Recruitment / Appointment		
1	Mr. Inayatullah DAE (Civil) from Govt. P/Inst: DI Khan	01-02-1962	DI Khan	24-3-1981	24-3-1981	16	By initial recruitment	Sub Engineer	
2	Mr. Faichullah DAE (Civil) from Polytechnic Inst: Haripur Passed Grade B exam on 26-01-1994 Passed Grade A exam on 23-03-1996	10-04-1964	Bannu	07-9-1986	07-9-1986	16	-do-	-do-	Allowed BS-16 on 07-09-1996. Working as SDO on acting charge basis
3	Mr. Kiaz Mohammad DAE (Civil) from Polytechnic Inst: Peshawar Passed Grade B exam on 14-05-1995 Passed Grade A exam on 28-12-1998	08-03-1965	Mardan	10-9-1986	10-9-1986	16	-do-	-do-	Working as SDO on acting charge basis
4	Mr. Waqar Shah DAE (Civil) from Polytechnic Inst: Hyder Abad Passed Grade B exam on 28-12-1998 Passed Grade A exam on 20-12-2002	24-03-1966	Nowshera	08-9-1986	08-9-1986	16	-do-	Sub Engineer	Working as SDO on acting charge basis
5	Mr. Noora Jan DAE (Civil) from Polytechnic Inst: Hyder Abad Passed Grade B exam on 14-05-1995 Passed Grade A exam on 28-12-1998	18-12-1964	S. Waziristan Agency	23-10-1986	23-10-1986	16	By initial recruitment	-do-	Working as SDO (OPS)
6	Mr. Jehanzeb DAE (Civil) from Polytechnic Inst: Peshawar Passed Grade B exam on 28-12-1998 Passed Grade A exam on 06-06-2000	20-10-1964	Peshawar	21-10-1986	21-10-1986	16	By initial recruitment	Sub Engineer	Working as SDO (OPS)
7	Mr. Haroon-ur-Rashid DAE (Civil) from Polytechnic Inst: Peshawar. Passed Grade B exam on 14-05-1995 Passed Grade A exam on 28-12-1998.	02-02-1961	Swat	27-06-1987	27-06-1987	16	-do-	-do-	Working as SDO (OPS)
8	Mr. Farmanullah DAE (Civil) from Polytechnic Inst: DI Khan. Passed Grade B exam on 05-03-1991 Passed Grade A exam on 14-05-1995	15-04-1966	DI Khan	11-12-1988	11-12-1988	16	-do-	-do-	Allowed BS-16 on 14-12-1998 Working as SDO (OPS)

Amex

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9

#	Name of Sub Engineer with Academic Qualification	Date of Birth	Domicile	Date of 1st Entry into Govt Service	Regular Appointment / Promotion			Present Appointment	Remarks
					Dated	BFS	Method of Recruitment / Appointment		
1	2	3	4	5	6	7	8	9	10
9	Mr. Shafiqat Fahim DAE (Civil) from Polytecnic Inst: Peshawar. Passed Grade B exam on 28-12-1998 Passed Grade A exam on 06-06-2000	01-01-1964	Karak	11-12-1988	11-12-1988	16	-do-	-do-	Working as SDO (OPS)
10	Mr. Asadullah Jan DAE (Civil) from Polytecnic Inst: DI Khan Passed Grade B exam on 05-03-1991 Passed Grade A exam on 14-05-1995	15-03-1962	DI Khan	11-12-1988	11-12-1988	16	-do-	-do-	Working as SDO (OPS)
11	Mr. Khawar Nadeem DAE (Civil) from Polytecnic Inst: DI Khan. Passed Grade B exam on 14-05-1995 Passed Grade A exam on 06-06-2000.	10-10-1969	DI Khan	11-12-1988	11-12-1988	16	-do-	-do-	Working as SDO (OPS)
12	Mr. Habibur Rehman DAE (Civil) from Polytecnic Inst: Peshawar. Passed Grade B exam on 05-03-1991 Passed Grade A exam on 28-12-1998	01-04-1965	Dir	11-12-1988	11-12-1988	16	-do-	-do-	Working as SDO (OPS)
13	Mr. Fazal Subhan DAE (Civil) from Polytecnic Inst: Peshawar.	22-03-1966	Malakand Agency	11-12-1988	11-12-1988	16	-do-	Sub Engineer	Not Eligible
14	Mr. Daud Khan-I DAE (Civil) from Polytecnic Inst: Peshawar. Passed Grade B exam on 14-12-1995 Passed Grade A exam on 28-12-1998 Passed Professional exam on 16-06-2003	01-01-1963	FR Peshawar	11-12-1988	11-12-1988	16	By initial recruitment	-do-	Working as SDO (OPS)
15	Mr. Qudratullah DAE (Civil) from Polytecnic Inst: DI Khan. Passed Grade B exam on 06-06-2000 Passed Grade A exam on 12-06-2004	15-06-1966	FR Banru	11-12-1988	11-12-1988	16	By initial recruitment	Sub Engineer	Working as SDO (OPS)
16	Mr. Maqsood Ali DAE (Civil) from Polytecnic Inst: Rasul Passed Grade B exam on 14-05-1995 Passed Grade A exam on 28-12-1998	20-01-1963	S. Waziristan Agency	11-12-1988	11-12-1988	16	-do-	-do-	
17	Mr. Mohammad Imran DAE (Civil) from Polytecnic Inst: Peshawar. Passed Grade B exam on 28-12-1998 Passed Grade A exam on 06-06-2000.	15-02-1967	Abbottabad	11-12-1988	11-12-1988	16	-do-	-do-	Working as SDO (OPS)
18	Mr. Nisar Ahmad DAE (Civil) from Polytecnic Inst: Haripur Passed Grade B exam on 28-12-1998 Passed Grade A exam on 27-05-2002	25-01-1965	Manshra	11-12-1988	11-12-1988	16	-do-	-do-	Working as SDO (OPS)



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#	Name of Sub Engineer with Academic Qualification	Date of Birth	Domicile	Date of 1st Entry into Govt Service	Regular Appointment / Promotion			Present Appointment	Remarks
					Dated	BPS	Method of Recruitment / Appointment		
1	2	3	4	5	6	7	8	9	10
19	Mr. Moharraz Iqbal DAE (Civil) from Polytechnic Inst: DI Khan Passed Grade B exam on 14-05-1995 Passed Grade A exam on 28-12-1998 Passed Professional exam on 11-02-2000	03-04-1966	DI Khan	09-12-1990	09-12-1990	16	-do-	-do-	Working as SDO (OPS)
20	Mr. Mohammad Yaqoob DAE (Civil) from Polytechnic Inst: DI Khan Passed Grade B exam on 28-12-1998 Passed Grade A exam on 01-06-2002 Professional 14-06-2001	28-03-1966	Bannu	09-12-1990	09-12-1990	16	-do-	-do-	Working as SDO (OPS)
21	Mr. Ismail Khan-I DAE (Civil) from Polytechnic Inst: Pesh: Passed Grade B exam on 06-06-2000 Passed Grade A exam on 12-06-2004	13-06-1966	Bannu	09-12-1990	09-12-1990	16	-do-	-do-	Working as SDO (OPS)
22	Mr. Mohammad Javed-II DAE (Civil) from Polytechnic Inst: Peshawar Passed Grade B exam on 14-05-1995 Passed Grade A exam on 28-12-1998 Passed Professional exam on 28-12-2000	25-08-1964	Karak	09-12-1990	09-12-1990	16	-do-	-do-	
23	Mr. Mehmood Sultan DAE (Civil) from Polytechnic Inst: Peshawar Passed Grade B exam on 06-06-2000 Passed Grade A exam on 12-06-2004	04-04-1964	Karak	09-12-1990	09-12-1990	16	By initial recruitment	Sub Engineer	Working as SDO (OPS)
24	Mr. Mohammad Hayat DAE (Civil) from Polytechnic Inst: Pesh: Passed Grade B exam on 12-06-2004 Passed Grade A exam on 28-05-2012	01-12-1967	Dir	09-12-1990	09-12-1990	16	-do-	-do-	Working as SDO (OPS)
25	Mr. Mohammad Iqbal-II DAE (Mechanical) from Polytechnic Inst: Haripur Passed Grade B exam on 21-02-2000 Passed Grade A exam on 08-03-2006	04-02-1968	Abbottabad	09-12-1990	09-12-1990	16	By initial recruitment	Sub Engineer	Working as SDO (OPS)
26	Mr. Kifayatullah-I DAE (Civil) from Polytechnic Inst: Peshawar Passed Grade B exam on 14-05-1995 Passed Grade A exam on 28-12-1998 Passed Professional exam on 03-07-2000	09-09-1960	Mardan	09-12-1990	09-12-1990	16	-do-	-do-	Working as SDO (OPS)

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#	Name of Sub Engineer with Academic Qualification	Date of Birth	Domicile	Date of 1st Entry into Govt Service	Regular Appointment / Promotion			Present Appointment	Remarks
					Dated	BPS	Method of Recruitment / Appointment		
1	2	3	4	5	6	7	8	9	10
27	Mr. Muslim Din DAE (Civil) from Polytechnic Inst: Pesh: Passed Grade B exam on 14-05-1995 Passed Grade A exam on 28-12-1998 passed Professional examination on 03-03-2017	20-01-1966	Bannu	09-12-1990	09-12-1990	16	-do-	-do-	Working as SDO (OPS)
28	Mr. Shafqat Abdul Ghafoor DAE (Civil) from Polytechnic Inst: Peshawar Passed Grade B exam on 12-06-2002 Passed Grade A exam on 31-1-2006.	01-09-1967	DI Khan	09-12-1990	09-12-1990	16	-do-	-do-	-do-
29	Mr. Roohullah DAE (Civil) from Polytechnic Inst: Peshawar Passed Grade B exam on 06-06-2000 Passed Grade A exam on 12-06-2004 B.Tech. (Civil) from UET Peshawar. Passed Revenue and professional Exam:	24-01-1970	Peshawar	09-12-1990	09-12-1990	16	-do-	-do-	-do-
30	Mr. Gul Shahzad DAE (Civil) from Polytechnic Inst: Peshawar Passed Grade B exam on 28-12-1998. Passed Grade A exam on 27-05-2002	12-05-1966	Abbottabad	09-12-1990	09-12-1990	16	-do-	-do-	-do-
31	Mr. Mohammad Sajjad DAE (Civil) from Polytechnic Inst: Peshawar Passed Grade B exam on 28-12-1998. Passed Grade A exam on 06-06-2000	01-05-1965	Abbottabad	19-3-1992	19-3-1992	16	-do-	-do-	-u-
32	Mr. Naseerullah DAE (Civil) from BTE Peshawar. Passed Grade B exam on 28-12-1998. Passed Grade A exam on 06-06-2000	02-03-1967	Dir	19-3-1992	19-3-1992	16	By initial recruitment	Sub Engineer	-u-
33	Mr. Sher Akbar DAE (Civil) from BTE Peshawar Passed Grade B exam on 30-06-2000. Passed Grade A exam on 12-06-2004.	18-11-1968	Mohmand Agency	16-8-1992	16-8-1992	16	-do-	-do-	-u-
34	Mr. Mudassar Khan DAE (Civil) from BTE Peshawar Passed Grade B exam on 28-12-1998. Passed Grade A exam on 06-06-2000	15-04-1963	FR Bannu	16-8-1992	16-8-1992	16	By initial recruitment	-do-	-u-
35	Mr. Sajjad Ali Shah DAE (Civil) from BTE Peshawar Passed Grade B exam on 12-06-2004. Passed Grade A exam on 28-07-2016.	01-04-1970	Manshra	26-4-1995	26-4-1995	16	-do-	-do-	Working as SDO (OPS)

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#	Name of Sub Engineer with Academic Qualification	Date of Birth	Domicile	Date of 1st Entry into Govt Service	Regular Appointment / Promotion			Present Appointment	Remarks
					Dated	BPS	Method of Recruitment / Appointment		
1	2	3	4	5	6	7	8	9	10
36	Mr. Nazir Ahmad DAE (Civil) from BTE Peshawar Passed Grade B exam on 12-06-2004 Passed Grade A exam on 27-05-2009	10-07-1969	Swat	4-3-1996	4-3-1996	16	-do-	-do-	-u-
37	Mr. Ahmad Raza DAE (Civil) from BTE Peshawar Passed Grade B exam on 27-05-2002	15-01-1967	Nowshera	4-3-1996	4-3-1996	16	..do..	-do-	SDO (Ops)
38	Mr. Daud Khan-II DAE (Civil) from BTE Peshawar Passed Grade B exam on 06-06-2000 Passed Grade A exam on 12-06-2004	12-12-1975	Charsadda	3-3-1996	3-3-1996	16	..do..	-do-	-u-
39	Mr. Hamed Nawaz DAE (Mechanical I) from BTE Peshawar Passed Grade B exam on 14-06-2000 Passed Grade A exam on 12-06-2004	03-10-1966	FR Bannu	6-3-1996	6-3-1996	16	-do-	-do-	-u-
40	Mr. Inamul Haq Lodhi DAE (Civil) from BTE Peshawar Passed Grade B exam on 22-05-2000	06-03-1971	Abbottabad	4-3-1996	4-3-1996	16	-do-	-do-	-u-
41	Mr. Zahid Jamal DAE (Civil) from BTE Peshawar. Passed Passed Grade B exam on 28-07-2016. Passed Grade A exam on 27-08-2018.	31-07-1972	Abbottabad	4-3-1996	4-3-1996	16	-do-	-do-	-u-
42	Mr. Maqsood Ahmad-II DAE (Civil) from BTE Peshawar Passed Grade B exam on 27/5/2002 Passed Grade A exam on 6/12/2004	08-11-1972	Mohmand Agency	4-3-1996	4-3-1996	16	-do-	-do-	-u-
43	Kifayatullah DAE Civil from BTE Peshawar Passed Grade B & A examinations	15-4-1969	DI Khan	15-8-1993 in Agrl: Deptt:	16-4-2003	16	By Absorption	Sub Engineer	
44	Mohammad Farooq DAE (Mech:) from BTE Peshawar	25-06-1962	Karak	1-6-1987 in Agriculture Deptt:	20-5-2003	16	-do-	Sub Engineer	
45	Mr. Hameedullah DAE (Mech:) from BTE Peshawar	15-07-1966	FR Bannu	14-11-1996 in Agriculture Deptt:	20-05-2003	16	By Absorption	-do-	
46	Mohammad Arshad DAE (Mech:) from BTE DI Khan	09-09-1965	Miran Shah		16-10-2003	16	..do..	..do..	
47	Mohammad Ashraf DAE (Civil) from Govt: P/Inst: DI Khan Passed Grade B exam on 06/06/2000 Passed Grade A exam on 28-5-2012	01-12-1968	DI Khan	15-11-1992	14-01-2004	16	By Promotion	..do..	Working as SDO (OPS)
48	Mr. Syed Mehr Ali Shah DAE (Civil) from Govt: P/Inst: DI Khan Passed Grade B exam on 06/06/2000 Passed Grade A exam on 27-05-2009	03-01-1970	DI Khan	22-01-1995	14-01-2004	16	By Promotion	Sub Engineer	

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#	Name of Sub Engineer with Academic Qualification	Date of Birth	Domicile	Date of 1st Entry into Govt Service	Regular Appointment / Promotion			Present Appointment	Remarks
					Dated	BPS	Method of Recruitment / Appointment		
1	2	3	4	5	6	7	8	9	10
49	Mr. Javed ur Rehman SSC. Passed Grade B exam on 27-05-2002	10-04-1962	Mardan	27-01-1985	14-01-2004	16	By Promotion	-do-	
50	Mr. Ikram Ullah SSC. Passed Grade B exam on 27/05/2002	23-04-1966	Mardan	11-02-1986	14-01-2004	16	-do-	-do-	
51	Mr. Inam Ullah DAE (Mech:) from Govt: P/Inst: DI Khan Passed Grade B exam on 12/06/2004	04-03-1964	DI Khan	15-03-1986	08-03-2005	16	-do-	-do-	
52	Mr. Imtiaz Ahmad DAE (Civil) from BTE Peshawar Passed Grade B exam on 12/06/2004	04-01-1961	Swabi	11-05-1987	08-03-2005	16	-do-	-do-	
53	Mr. Mohammad Arif DAE (Civil) Govt: P/Inst: DI Khan Passed Deptt: B-Grade Exam on 12-6-04	05-03-1965	DI Khan	03-01-1989	08-03-2005	16	-do-	-do-	
54	Mr. Abdur Rehman DAE (Civil) Govt: P/Inst: Peshawar Passed Deptt: B-Grade Exam on 12-6-2004 Passed Deptt: A-Grade Exam on 23-7-2016	15-04-1968	Darra Adam Khel	15-08-1992	08-03-2005	16	By Promotion	Sub Engineer	
55	Mr. Naveed Ahmad DAE (Civil) Govt: P/Inst: Peshawar Passed Deptt: B-Grade Exam on 12-6-2004 Passed Grade-A Exam on 31-01-2006	10-04-1971	Peshawar	05-01-1995	08-03-2005	16	-do-	-do-	
56	Mr. Azhar Qayum DAE (Civil) Govt: P/Inst: Peshawar Passed Deptt: B-Grade Exam on 12-6-2004	30-09-1973	DI Khan	08-01-1995	08-03-2005	16	-do-	-do-	
57	Mr. Fida Mohammad, DAE (Civil) Govt: P/Inst: Peshawar Passed Deptt: B-Grade Exam on 12-6-2004	16-04-1973	Malakand Agency	01-02-1995	08-03-2005	16	By Promotion	Sub Engineer	
58	Mr. Haroon-ur-Rashid DAE (Civil) Govt: P/Inst: Peshawar Passed Deptt: B-Grade Exam on 12-6-2004	01-04-1974	Mardan	27-03-1995	29-03-2005	16	By Promotion	-do-	
59	Malik Abdul Waheed DAE (Civil) from Govt: P/Inst: DI Khan Passed Deptt: B-Grade Exam on 12-6-2004 Passed Deptt: A-Grade Exam on 23-7-2016	15-05-1972	DI Khan	30-10-1994	21-12-2005	16	By Promotion	Sub Engineer	

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#	Name of Sub Engineer with Academic Qualification	Date of Birth	Domicile	Date of 1st Entry into Govt Service	Regular Appointment / Promotion			Present Appointment	Remarks
					Dated	BPS	Method of Recruitment / Appointment		
60	Mr. Ibrakhar Ahmad-I DAE (Electrical) from Govt. P/Inst. Pesh. Passed Dept. Grade-B Exam on 12-6-2004 Passed Grade-A Exam on 6-8-2014	20-03-1972	Peshawar	12-06-1995	21-12-2005	16	-do-	-do-	
61	Mr. Shoukat Hussain DAE (Mech) from Govt. P/Inst. DI Khan. Passed Grade-B Exam on 31-01-2006 Passed Grade-A Exam on 06-08-2016	04-12-1966	DI Khan	03-03-1990	5-6-2006	16	-do-	-do-	
62	Mr. Muhammad Ashfaq DAE (Mech) from Govt. P/Inst. Swat. Passed Grade-B Exam on 31-01-2006	15-04-1967	Malakand Agency	02-02-1991	5-6-2006	16	-do-	-do-	
63	Mr. Muhammad Tufail Anwar DAE (Mech) from Govt. P/Inst. Peshawar Passed Grade B exam on 31-01-2006 Passed Grade A exam on 27-05-2009	08-10-1970	Kohat	19-09-1994	5-6-2006	16	..do..	-do-	
64	Mr. Shoukat Hayat DAE (Civil) from Govt. P/Inst. DI Khan Passed Grade B exam on 31-01-2006 Passed Grade A exam on 27-05-2009	18-05-1972	Karak	12-01-1995	5-6-2006	16	..do..	-do-	
65	Mr. Azam Khan DAE (Elect) from Govt. P/Inst. Haripur Passed Grade-B Exam on 31-01-2006	02-04-1967	Manshra	19-06-1995	5-6-2006	16	..do..	-do-	
66	Mr. Saeed Gul DAE Civil from G.C.T Peshawar. Passed Passed Grade B exam on 16-08-2018	20-01-1976	Nowshera	17-11-2006	17-11-2006	16	By initial Recruitment	-do-	
67	Mr. Abdul Wakil DAE Civil from Board of Tech. Education Pesh.	01-01-1984	Chitral	17-11-2006	17-11-2006	16	..do..	-do-	
68	Mr. Muhammad Mumtaz DAE Civil from G.C.T A/Abad. Passed Passed Grade B exam on 16-08-2018.	04-10-1978	Abbottabad	17-11-2006	17-11-2006	16	By initial recruitment	Sub Engineer	
69	Mr. Sheikh Ijaz-ud-Din DAE (Mech): BTE Peshawar	15-09-1964	DI Khan	26-04-1984	29-09-2007	16	By Absorption.	..do..	
70	Mr. Mohammad Zaman SSC Passed Grade B exam on 27-05-2009	01-09-1960	Mardan	17-11-1982	29-01-2010	12	By Promotion	Sub Engineer	
71	Mr. Fazal Qayum SSC Passed Grade B exam on 31-01-2006	09-09-1962	Swabi	24-09-1985	29-01-2010	12	By Promotion	..do..	
72	Mr. Tayyeb Saeed DAE (Civil) GPI Rasul. Passed Grade B exam on 28-7-2016.	21-07-1977	DIR	19-10-2010	19-10-2010	12	By initial recruitment	Sub Engineer	

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#	Name of Sub Engineer with Academic Qualification	Date of Birth	Domicile	Date of 1st Entry into Govt Service	Regular Appointment / Promotion			Present Appointment	Remarks
					Dated	BPS	Method of Recruitment / Appointment		
1	2	3	4	5	6	7	8	9	10
73	Mr. Ibrar Ahmad DAE (Civil) GPI Peshawar	16-09-1986	Abbottabad	19-10-2010	19-10-2010	12	..do..	..do..	
74	Mr. Anwar Hayat DAE (Electrical) GPI Peshawar Passed Grade B exam on 27-5-2009	01-03-1970	DI Khan	10-08-1992	31-12-2010	12	By Promotion	..do..	
75	Syed Zia-ul-Hassan DAE (Mechanical) BTE Peshawar Passed Grade B exam on 12-06-2004 Passed Grade A exam on 31-01-2006	16-03-1973	Hangu	21-05-1996	21-03-2011	12	By Promotion	-do-	
76	Arshad Ali DAE (Civil) from Get Nowshera. Passed Grade B exam on 28-7-2016. Passed Grade A exam on 27-07-2018.	16-03-1991	Bajor Agency	19-11-2011	19-11-2011	12	By initial Recruitment	-do-	
77	Muhaminad Younas DAE (Civil) from UET Peshawar. Passed Grade B exam on 20-07-2016. Passed Grade A exam on 27-7-2018	16-03-1985	Peshawar	19-11-2011	19-11-2011	12	-do-	-do-	
78	Mulazim Hussain Matric. Passed Grade B exam on 31-1-2016.	06-07-1967	DI Khan	1-06-1991	1-08-2012	12	By Promotion	-do-	
79	Imad Jan. DAE Civil BTE Peshawar. Passed Grade D exam on 16-08-2018.	15-2-1991	Charsadda	14-9-2013	16-9-2013	12	By initial Recruitment	-do-	
80	Muhaminad Abbas DAE (Civil) Peshawar	14/2/1992	DI Khan	16/9/2013	16/9/2013	12	-do-	-do-	
81	Uzair Khan DAE (Civil) Peshawar	01/12/1990	Charsadda	16/9/2013	16/9/2013	12	-do-	-do-	
82	Muhammad Nawaz DAE (Civil) Peshawar. Passed Grade B Exam on 16-08-2018.	25/5/1977	Lakki Marwat	16/9/2013	16/9/2013	12	-do-	-do-	
83	Imtiaz Ali DAE (Civil) Peshawar. Passed Grade B on 16-08-2018.	14/3/1992	Bajor Agency	16/9/2013	16/9/2013	12	By initial Recruitment	Sub Engineer	
84	Azmat Khan DAE (Civil) BTE Peshawar	06/9/1991	Khyber Agency	16/9/2013	16/9/2013	12	By initial Recruitment	-do-	
85	Danish Shah DAE (Civil) Peshawar	06/3/1992	Manshra	16/9/2013	16/9/2013	12	-do-	-do-	
86	Junaid Ali DAE (Civil) Peshawar	26/3/1986	Malakand	16/9/2013	16/9/2013	12	-do-	-do-	
87	Syed Zaheed Din DAE Civil	25-12-1991	Manshra	16/9/2013	16/9/2013	12	-do-	-do-	
88	Abdul Qadus DAE (Civil) Peshawar. Passed Grade B exam on 16-08-2018.	1/3/1992	Haripur	16/9/2013	16/9/2013	12	By initial recruitment	Sub Engineer	

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#	Name of Sub Engineer with Academic Qualification	Date of Birth	Domicile	Date of 1st Entry into Govt Service	Regular Appointment / Promotion			Present Appointment	Remarks
					Dated	BPS	Method of Recruitment / Appointment		
1	2	3	4	5	6	7	8	9	10
89	Razuallah DAE (Civil) BTE Peshawar. Passed Grade B exam on 27-09-2009. Passed Grade-A exam on 6-8-2014	13/3/1979	Bannu	16/9/2013	16/9/2013	12	-do-	-do-	
90	Mr. Noor Muhammad DAE(Civil) passed Grade-B & A exam	1-3-1979	Bannu	23-7-2004	16-10-2014	12	By Promotion	-do-	
91	Waqar Ali Matic. Passed Grade-B Exam: on 27-5-2002	18/4/1966	Swabi	1/7/1987	16/11/2015	12	-do-	-do-	
92	Mr. Qaisar Iqbal Matic. Passed Grade B Exam on 7-5-2009	20/4/1978	DIKhan	10/11/1996	8/1/2016	12	-do-	-do-	
93	Mr. Nek Ainal Matic. Passed Grade-B Exam on 31-01-2006 Passed Grade-A exam on 20-7-2016	2/8/1971	Khyber Agency	5/9/1985	8/1/2016	12	-do-	-do-	
94	Mohammad Shahid Ghani DAE Civil BTE Peshawar Matic. Passed Grad B exam on 4-8-2014 Passed Grade-A exam on 20-7-2016	22-5-1988	DIKhan	24-7-2006	17-2-2017	12	-do-	-do-	
95	Mr. Irfan Ullah DAE (Civil) BTE Peshawar Passed Grade-B exam on 6-8-2014 Passed Grade-A exam on 23-7-2017	20-3-1986	Karak	20-2-2008	17-2-2017	12	-do-	-do-	
96	Mr. Adil Khan DAE Civil BTE Peshawar. Passed Grade B exam on 16-08-2018.	4/7/1989	Swabi	3/9/2017	3/9/2017	12	By Absorption	-do-	
97	Mr. Umar Farzeed DAE Civil BTE Peshawar	3-11-1996	Haripur	18-9-2017	18-9-2017	12	By initial Recruitment	Sub Engineer	
98	Mr. Nasar Khan DAE Civil. BTE Peshawar	4-10-1990	Dir Upper	18-9-2017	18-9-2017	12	-do-	-do-	
99	Mr. Kifayatullah DAE Civil BTE Peshawar	5-4-1995	Bannu	18-9-2017	18-9-2017	12	-do-	-do-	
100	Mr. Munir Ahmed DAE Civil BTE Peshawar	1-2-1997	Bannu	18-9-2017	18-9-2017	12	-do-	-do-	
101	Mr. Abbas Khan DAE Civil BTE Peshawar	4-5-1991	MKD Agency	18-9-2017	18-9-2017	12	-do-	-do-	
102	Mr. Zahid Ali DAE Civil BTE Peshawar	11-4-1988	A. Abad	18-9-2017	18-9-2017	12	-do-	-do-	
103	Muhammad Sajjad DAE Civil BTE Peshawar	24-4-1992	Malakand	20-7-2018	20-7-2018	12	By initial recruitment	Sub Engineer	
104	Muhammad Awaiz DAE Civil BTE Peshawar	24-4-1992	Malakand	20-7-2018	20-7-2018	12	-do-	-do-	
105	Mr. Zeeshan DAE Civil BTE Peshawar	20-7-1990	Malakand	20-7-2018	20-7-2018	12	By initial recruitment	-do-	
106	Mr. Zeeshan DAE Civil BTE Peshawar	30-4-1994	Peshawar	20-7-2018	20-7-2018	12	By initial recruitment	-do-	
107	Mr. Bakht Muncr DAE Civil BTE Peshawar	2-4-1991	Mehmand Agency	20-7-2018	20-7-2018	12	By initial recruitment	Sub Engineer	
107	Mr. Naveed Rehman DAE Civil BTE Peshawar	10-2-1993	Peshawar	20-7-2018	20-7-2018	12	By initial recruitment	Sub Engineer	

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#	Name of Sub Engineer with Academic Qualification	Date of Birth	Domicile	Date of 1st Entry into Govt Service	Regular Appointment / Promotion			Present Appointment	Remarks
					Dated	BPS	Method of Recruitment / Appointment		
1	2	3	4	5	6	7	8	9	10
108	Syed Mazhar Hussain DAE Civil BTE Peshawar	14-4-1988	Manshra	20-7-2018	20-7-2018	12	By initial recruitment	Sub Engineer	
109	Nehlab Ahmad Khan DAE Civil Punjab Board Lahore	1/1/1998	FR Tank	17-07-2019	17-07-2019	12	By initial recruitment	Sub Engineer	
110	Mohammad Sajid DAE Civil from BTE Peshawar	15-4-1993	Mardan	17-07-2019	17-07-2019	12	By initial recruitment	Sub Engineer	
111	Maaz Ikram DAE Civil from BTE Peshawar	12/3/1994	Swat	17-07-2019	17-07-2019	12	By initial recruitment	Sub Engineer	
112	Mr. Irfan Yousaf DAE from PBTE Lahore	7/1/1996	Haripur	17-07-2019	17-07-2019	12	By initial recruitment	Sub Engineer	
113	Hafiz Saeedur Rehman DAE Civil from PBTE Lahore	7/4/1992	NW Agency	17-07-2019	17-07-2019	12	By initial recruitment	Sub Engineer	
114	Mr. Adil Anwar DAE Civil from BTE Peshawar	15-03-1991	Manshra	17-7-2019	17-07-2019	12	By initial recruitment	Sub Engineer	
115	Mr. Kausar Ali Shah DAE Civil	10/10/1993	Karak	9/8/2019	9/8/2019	12	By initial recruitment	Sub Engineer	
116	Syed Salman Abid DAE Civil	5/11/1991	Mardan	9/8/2019	9/8/2019	12	By initial recruitment	Sub Engineer	

No. 2414 /IB/A3-E(iii) dated Peshawar 26/06/2020

FS

*[Signature]*  
Superintending Engineer  
(Headquarter)

- Copy to the above is forwarded to:-
1. Chief Engineer (Nourth) Irrigation Department Peshawar
  2. PD. Remodelling Peshawar/Siran Project A/Abad.
  3. PD Rehabilitation Project Peshawar/PIILC Swabi.
  4. All Superintending Engineers in Irrigation Department.
  5. All Executive Engineers in Irrigation Department Peshawar.
- The are requested to note the seniority from all concerned and appeal etc against the seniority list may be submitted within one month please

Superintending Engineer  
(Headquarter)



To,

The Secretary to Government of Khyber Pakhtunkhwa,  
Irrigation Department, Peshawar.

*Amir*  
5111  
Date: 25-8-2020  
192

Subject:

**APPEAL AGAINST THE SENIORITY LIST OF DIPLOMA  
HOLDER/ NON DIPLOMA HOLDER SUB ENGINEERS OF  
IRRIGATION DEPARTMENT AS STOOD ON 31-12-2019  
ISSUED ON 26-06-2020 ACKNOWLEDGED ON 31-07-2020.**

Sir,

Most profoundly, it is stated that I joined the Irrigation Department on 03-03-1990 having the qualification of Diploma in Associate Engineering and was working in the Drawing Establishment. All the service is free from any adverse entry.

The Establishment Department amended the Recruitment / Promotion Rules on 15-08-2003, wherein 15% promotion quota was fixed to the post of Sub Engineer with the qualification of Diploma in Associate Engineering Plus 10-Years service and passing of prescribed Departmental Examination.

After the amendment under the Recruitment / Promotion Rules, the Department conducted Examination upon which successful candidates in the 15% quota were promoted to the Sub Engineer Cadre in the year 2005, whereas, my case was not considered at all. I qualified the Departmental Exam in the Year 2006 and thereafter I was promoted to Sub Engineer Cadre in the Year 2006.

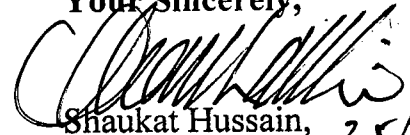
While perusing the seniority list it is come into the notice that the officials who were promoted in the year 2005 have been shown senior to me whereas all the promotees of 2005 were actually Junior in the Lower Cadre.

It is also pertinent to mention here that I was never superseded by the DPC nor I have been considered at all with the promotees of 2005 who were Junior to me. In such situation my promotion would be deemed from the date when juniors were promoted because my case was coming under the ambit of deferment and in case of deferment no loss his seniority is occurred.

20

Since I have been discriminated and relegated to the seniority list in violation of Law and principal of justice, therefore, it is requested that the seniority list may be corrected and my name in the seniority list may be place at Sr.No.47 (above the name of juniors). Any other remedy that may also be awarded.

Your Sincerely,



Shaukat Hussain,  
Sub Engineer,  
Irrigation Department,  
Peshawar.

25/08/2020



**OFFICE OF THE CHIEF ENGINEER (SOUTH)  
GOVT: OF KHYBER PAKHTUNKHWA  
IRRIGATION DEPARTMENT PESHAWAR**

Ph: 091-9212116 Fax No. 091-9212652 E-Mail: chiefoffice@yahoo.com

No. 658 /IB/A/9-E

Dated Peshawar 04/2/2021

To

Mr. Shaukat Hussain  
Sub Engineer C/O Executive Engineer  
Peshawar Canals Division Peshawar.

Subject:- **APPEAL AGAINST THE SENIORITY LIST OF DIPLOMA  
HOLDER/NON DIPLOMA HOLDER SUB ENGINEER OF  
IRRIGATION DEPARTMENT AS STOOD ON 31-12-2019 ISSUED  
ON 26-6-2020 ACKNOWLEDGED ON 31-7-2020**

Reference:- Your appeal dated 25-8-2020.

I am directed to refer to your appeal for placing your name at Sl:No.47 of the Diploma Holders Seniority list as stood on 31-12-2019.

I am further directed to state that the Sub Engineers at Sl:No.47 to 60 of the said seniority list have passed the Departmental Grade B Examination on 6-6-2000, 27-5-2002 and 12-6-2004 which is pre-requisite for promotion as Sub Engineers under 15% quota as laid down in the notification bearing No.SO(E)IRR:/23-5/73, dated 15-8-2003 (Copy attached) who were promoted as Sub Engineers on 14-1-2004, 8-3-2005, 29-3-2005 and 21-12-2005, during the period you were not eligible/qualified for promotion as Sub Engineer as you have passed the Departmental Grade B examination on 31-1-2006 and have been promoted as Sub Engineer BS-11 on 5-6-2006. As such you are placed at appropriate place in the seniority list, therefore the appeal is regretted.

*[Signature]*  
ADMINISTRATIVE OFFICER  
(PHONE.NO.9212118) 4/2

CC

Section Officer (Estt:) Government of Khyber Pakhtunkhwa Irrigation  
Department with reference to his letter No.SO(E)IRR:/4-1/83/Vol:VI, dated 5-1-2021.

*74/2-E S+E Bawa*  
*12/2021 ADD/SFS*  
*488/134-E 9/2021*  
*07-2-2021*  
*Shaukat Hussain C-II*  
*No. 384-134-E #10/2/2021*  
*Copy of the above is forwarded to SDO, C.C. Sub Divn: Peshawar for information and reaction*  
*04/02/2021*  
*For record*  
*Put up for 08/02/2021*  
*SDO (20)*  
*Shaukat Hussain reply of his appeal do*  
*SDO*  
*original my hand on*  
*to Commr of Irrigation*  
*copy of original*  
*7/2*  
*Administrative Officer*  
*Peshawar Canals Division*  
*Peshawar*

**VAKALAT NAMA**

NO. \_\_\_\_\_/2021

IN THE COURT OF KP Service Tribunal, Peshawar

Shaukat Hussain (Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

Resignation Deptt (Respondent)  
(Defendant)

I/We, Shaukat Hussain

Do hereby appoint and constitute **M. Asif Yousafzai, Advocate Supreme Court Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us

Dated \_\_\_\_\_/2020

(Signature)  
(CLIENT)

ACCEPTED

(Signature)  
**M. ASIF YOUSAFZAI**  
Advocate Supreme Court  
Of Pakistan.

(**SYED NOMAN ALI BUKHARI**)  
Advocate High Court

(Signature)  
(**TAIMUR ALI KHAN**)  
Advocate High Court

(**ASAD MAHMOOD**)  
Advocate High Court

(**SHAHKAR KHAN YOUSAFZAI**)  
Advocate

**OFFICE:**

Room # FR-8, 4<sup>th</sup> Floor,  
Bilour Plaza, Peshawar,  
Cantt: Peshawar  
Cell: (0333-9103240)

**"B"**

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

No.

Appeal No. *6583* of 20*21*

*Shukat Hassan* Appellant/Petitioner

Versus

*The Secy (cont. of) KIK investigation* Respondent

Respondent No. *2*

Notice to: —

*the (Chief Engineer (cont.) investigation Deptt. Peshawar.*

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case, by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on *15/12/21* at **8.00 A.M.** If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing **4 copies** of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this~~

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this *5/11*

Day of *Nov* 20*21*

*(for Reply)*

*[Signature]*  
Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

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

No.

Appeal No. 6583 of 20 21

Shukat Hussain

Appellant/Petitioner

1  
copy

the Recy. Court of KPK Irrigation

Versus

Respondent

Respondent No. ....

the Superintendent Engineer  
Peshawar Irrigation Circle Peshawar

Notice to: —

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 15/12/21 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this~~

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this..... 5th

Day of..... Nov 20 21

For Reply



Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

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

No.

Appeal No. *6583* of 20 *21*

*Shukat Hussain* Appellant/Petitioner

Versus

*The Insp. Genl. of I/A* Respondent

Respondent No. *4*

Notice to: —

*Muhammad Ashraf SDO (OPS) Rodkani*  
*Investigation Division D.I. Khan.*

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on *15/12/21* at 8.00 A.M. If you wish to urge anything against the appellants/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this *5th*.....

Day of *Nov*.....20 *21*

*for Reply*



Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

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

D.B

No.

Appeal No..... 6583 ..... of 20 21

..... Shukat Hussain ..... Appellant/Petitioner  
Versus

The Secy. Genl. of Kpk Irrigation ..... Respondent  
Respondent No..... 50 .....

egd

Notice to: —

Syed Mehw Ali Shah Sub Engineer  
Flood Irrigation Division D-I Khan

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on..... 15/12/21 ..... at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

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

Given under my hand and the seal of this Court, at Peshawar this..... 5/12 .....

Day of..... Nov ..... 20 21

(For Reply)

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.



**"B"**

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

No.

Appeal No. 1588 of 20 21

Shahid Hussain Appellant/Petitioner

Versus

The Sargodha Cantonment Police Station Respondent

Respondent No. 6

Notice to: —

Munir Ahmad Sub Engineer Swabi  
Investigation Division Swabi

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on 15/12/21 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 5/11/21

Day of Nov 20 21

(90/19/21)

Registrar

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

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

No.

Appeal No. *6583* of 20 *21*

*Shukat Hussain* Appellant/Petitioner

Versus

*The Sup. Court of the Irrigation* Respondent

Respondent No. *7*

Notice to: —

*Abdus Rehman Sub Engineer Kohat*  
*Irrigation Division Kohat*

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on *15/12/21* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this *5<sup>th</sup>*

Day of *Nov* 20 *21*

*for Reply*

*[Signature]*  
 Registrar

Khyber Pakhtunkhwa Service Tribunal,  
 Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
 2. Always quote Case No. While making any correspondence.

**"B"**

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

No.

Appeal No. 6583 of 20 21

Shukat Hussain Appellant/Petitioner

2  
egd

The Secy. Govt. CF KPK Irrigation Respondent

Respondent No. 10

Notice to: Fida Muhammad Sub Engineer Swat  
Irrigation Division Swat.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 15/12/21 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this 5th

Day of Nov 20 21

(for Reply)



Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

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

No.

Appeal No. 6583 of 20 21

Shukat Hussain Appellant/Petitioner

Versus

The Secy. Govt of K/Pk Irrigation Respondent

Respondent No. 11

*Legd*

Notice to: —

Havoon us Rashid Sub Engineer Swat  
Irrigation Division Swat.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 15/12/21 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this 5th

Day of Nov 20 21

*(for reply)*

  
Registrar

**Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.**

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

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

No.

Appeal No..... 1583 ..... of 20 21

Shukat Hussain ..... Appellant/Petitioner

Versus

The Secy. Govt. of KPK Irrigation ..... Respondent

Respondent No..... 12 .....

Notice to: —

Malik Abdul Wahed Sub Engineer  
Pharphur Irrigation Division D.I. Khan

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on..... 15/12/21 ..... at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

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

Given under my hand and the seal of this Court, at Peshawar this..... 5/12 .....

Day of..... Nov ..... 20 21

(For Reply)

[Signature]  
Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

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

No.

Appeal No. 6583 of 20 21

Shukat Hussain Appellant/Petitioner

Versus

The Secy. Govt. of KP Peshawar irrigation Respondent

Respondent No. 13

Notice to: —

iftikhar Ahmad Sub Engineer  
Peshawar canal Division Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....15/12/21.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

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

Given under my hand and the seal of this Court, at Peshawar this.....5<sup>th</sup>.....

Day of.....Nov.....20 21

(for Reply)

[Signature]  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.



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**BEFORE THE KHYBER PAKHTUNKHWA SERVICER TRIBUNAL**  
**PESHAWAR**

Service Appeal No. 6583/2021

Mr. Shaukat Hussain Sub Engineer  
Irrigation Department Peshawar

Appellant

V/S

1. The Secretary to Govt: of Khyber Pakhtunkhwa  
Irrigation Department Peshawar. **Respondents**
2. The Chief Engineer (South) Irrigation Department Khyber Pakhtunkhwa  
Peshawar.
3. The Superintending Engineer Peshawar Irrigation Circle Peshawar.

**JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO.1 to 3.**

**Respectfully Sheweth,**

**Preliminary objections**

- i) That the appeal is time barred.
- ii) That the appellant has no locus standi .
- iii) That the appeal is bad for misjoinder and non joinder of necessary parties.
- iv) That the appellant has not come to the court with clean hands.
- v) That the appeal of the appellant based by law & rules.

**OBJECTIONS ON FACTS**

1. The para is correct to the extent that the appellant has joined the department as tracer on 3-3-1990 and was promoted as Draftsman on 30-07-1995 and as Sub Engineer on 05-06-2006.
2. The para is Correct.
3. The para is correct.A combined seniority list of Canal Inspector work taker Drawing Establishment and Mechanical having diploma of associate engineering has was maintained on regional office level on the basis of Service Rules contained in Notification No.SO(E)Irr:/23/5/73, dated 15-8-2003 (Annexure-I).
4. The para is partially correct. The respondents No.04 to 13 were promoted as Sub Engineers on 14-1-2004,8-3-2005,29-3-2005 and 21-12-2005 being qualified and eligible while the appellant was not qualified at that time as he did not passed Grade B examination and was not considered for promotion at that time. His promotion was however considered on 5-6-2006 after qualifying the Departmental Grade B examination as per rule (Annexure-I) above.
5. The para is incorrect, the respondents No.47 to 60 were promoted during 14-1-2004,8-3-2005 ,29-3-2005 and 21-12-2005 as Sub Engineers BS-11 while the appellant has been promoted on 05-06-2006 after becoming eligible therefore the respondents No.47 to 60 were placed senior from the



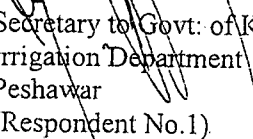
appellant in the seniority list of diploma holder Sub Engineers issued from time to time.


6. The para is incorrect, the claim of appellant regarding grant of seniority over respondents No.47 to 60 is not based on relevant rules as he was promoted as Sub Engineer much later than respondents No.47 to 60 therefore his appeal is not worth consideration on the following grounds.

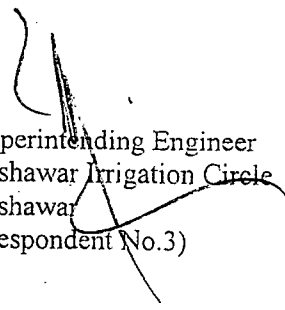
OBJECTIONS ON GROUNDS:-

- A. Incorrect hence denied. The seniority list of diploma holders Sub Engineer is according to rules/ regulation and was reckoned on the basis of date of appointment and subsequent promotion as Sub Engineer.
- B. Incorrect hence denied, name of the appellant was not on the panel of eligible candidates who were considered for promotion as Sub Engineer BS-11 in 2004 as he was not eligible at that time.
- C. Incorrect hence denied, the appellant has been granted seniority from the date of his promotion as Sub Engineer strictly according to rules.
- D. In correct hence denied the appellant has been treated according to rules and no in justice has been made with the appellant.
- E. That the respondent also seek permission to present additional ground during the course of arguments.

It is very humbly prayed that on acceptance of the instant parawise comments appeal of the appellant may kindly be dismissed with cost.

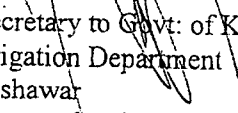
  
Secretary to Govt. of Khyber Pakhtunkhwa  
Irrigation Department  
Peshawar  
(Respondent No.1)

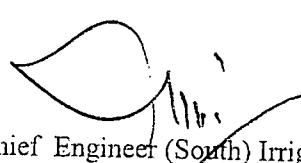
  
Chief Engineer (South) Irrigation  
Department Khyber Pakhtunkhwa  
Peshawar  
(Respondent No.2)

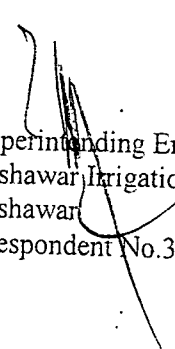
  
Superintending Engineer  
Peshawar Irrigation Circle  
Peshawar  
(Respondent No.3)

## POWER OF ATTORNEY

Mr. Zeeshan Zaheer Sub Divisional Officer, Civil Canal Sub Division Peshawar is hereby authorized to attend the Khyber Pakhtunkhwa Service Tribunal Peshawar on behalf of the respondents No.1 to 3 in Appeal No.6583/2021 Shaukat Hussain Sub Engineer V/S Government of Khyber Pakhtunkhwa Irrigation Department.

  
Secretary to Govt. of Khyber Pakhtunkhwa  
Irrigation Department  
Peshawar  
(Respondent No.1)

  
Chief Engineer (South) Irrigation  
Department Khyber Pakhtunkhwa  
Peshawar  
(Respondent No.2)

  
Superintending Engineer  
Peshawar Irrigation Circle  
Peshawar  
(Respondent No.3)

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL  
PESHAWAR

Service Appeal No. 6583/2021

Mr. Shaukat Hussain Sub Engineer  
Irrigation Department Peshawar

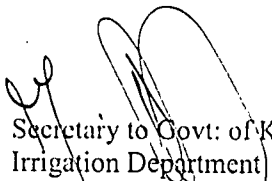
Appellant


V/S

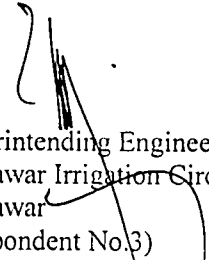
1. The Secretary to Govt: of Khyber Pakhtunkhwa  
Irrigation Department Peshawar. Respondents
2. The Chief Engineer (South) Irrigation Department Khyber Pakhtunkhwa  
Peshawar.
3. The Superintending Engineer Peshawar Irrigation Circle Peshawar.

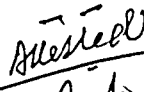
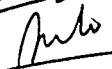
COUNTER AFFIDAVIT ON BEHALF OF RESPONDENTS NO.1 to 3.

We hereby solemnly affirm and declare that Parawise Comments given in appeal No. 6583/2021 Shaukat Hussain V/S Govt: of Khyber Pakhtunkhwa are correct to the best of our knowledge and nothing has been concealed from this honourable Court.

  
Secretary to Govt: of Khyber Pakhtunkhwa  
Irrigation Department  
Peshawar  
(Respondent No.1)

  
Chief Engineer (South) Irrigation  
Department Khyber Pakhtunkhwa  
Peshawar  
(Respondent No.2)

  
Superintending Engineer  
Peshawar Irrigation Circle  
Peshawar  
(Respondent No.3)

  
  
24-05-2022  
MIAN SIDDIQULLAH SHAN  
Notary Public  
High Court Peshawar

GOVERNMENT OF N.W.F.P.  
IRRIGATION & POWER DEPARTMENT

NOTIFICATION

Dated, Peshawar, the 15<sup>th</sup> August, 2003

No. SOE/IRR/23/5/73. In pursuance of the provisions contained in sub-rule (2) of rule 3 of the North-West Frontier Province Government Servants (Appointment, Promotion & Transfer) Rules, 1989, the Irrigation & Power Department, in consultation with the Establishment Department and the Finance Department, hereby directs that in the North-West Frontier Province Irrigation and Public Health Department (Recruitment and Appointment) Rules, 1979, the following further amendment shall be made, namely:

AMENDMENT

In the Schedule, in column 7 against serial 10, for the existing entry the following shall be substituted, namely:

- (i) Eighty per cent by initial recruitment. ✓
- (ii) Fifteen per cent by promotion, on the basis of seniority-cum-Fitness, from amongst members of service holding posts of Canal Inspector, Work Taker, Drawing Establishment and Mechanical, having Diploma of Associate Engineering from a Recognized Institute of Pakistan/Board of Technical Education with at least ten (10) years service, passed the prescribed Departmental Examination; and
- (iii) Five per cent by promotion, on the basis of seniority-cum-fitness, from amongst members of service holding posts of Canal Inspector, Work Taker, Work Munshi & Work Superintendent with at least fifteen (15) years service, who have passed the prescribed Departmental Examination. ✓

Secretary to Government  
of the North-West Frontier Province,  
Irrigation & Power Department

Dated: 15/08/2003

Copy forwarded to the:-

1. Administrative Secretaries to Govt. of NWFP
2. Secretary to Government, NWFP Peshawar
3. Secretary to Chief Minister, NWFP Peshawar
4. Secretary to Chief Secretary, NWFP Peshawar
5. Chief Engineer (Genl), Irrigation Department
6. Chief Engineer (Dev.), Irrigation Department
7. Manager Government Printing Press, Peshawar, for publication in the next issue of Government Gazette
8. Secretary, Public Service Commission Peshawar
9. Section Officer (R-V), Establishment & Administration Department Peshawar
10. Assistant Legal Drafter-II, Law Department Peshawar