

29.08.2022

Appellant present in person. Kabir Ullah Khattak, Additional AG present.

Fresh notices be issued to respondents for submission of written reply/comments. To come up for written reply/comments on 16.08.2022 before S.B.




(Fareeha Pauli)
Member (E)

16.08.2022

Appellant in person present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Reply/comments on behalf of respondents not submitted. Learned AAG seeks time to contact the respondents for submission of reply/comments. Adjourned by way of last chance. To come up for reply/comments on 04.10.2022 before S.B.

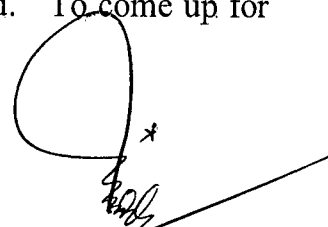


(Mian Muhammad)
Member (E)

04.10.2022

Appellant present in person. Mr. Muhammad Adeel Butt, Addl. AG alongwith Attaur Rehman, Asstt. for the respondents present.

Reply/comments have not been submitted. Learned AAG requested for further time. Last opportunity is granted. To come up for written reply/comments 25.11.2022 before S.B.



(Mian Muhammad)
Member (E)

22.02.2022

Rs-500/-
Appellant Deposited
Security & Process Fee

H. M. J. Khan
25/04/22

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 18.04.2022 for the same as before.

[Signature]
Reader

18th April, 2022

Counsel for the appellant present. Notices be issued to the respondents. To: come up for written reply/comments on 26.05.2022 before S.B.

[Signature]
Chairman

26.05.2022

Appellant in person present. Mr. Noor Zaman Khattak, District Attorney for the respondents present.

Written reply/comments on behalf of respondents not submitted. Notice be issued to the respondents for submission of written reply/comments. Adjourned. To come up for written reply/comments on 08.06.2022 before S.B.

[Signature]
(Mian Muhammad)
Member (E)

25.10.2021

Counsel for the appellant present. Preliminary arguments have been heard.

The appellant submits that he was placed at S.No. 10 of the impugned seniority list instead of his actual place of seniority at S. No. 09 wherein one Naseem Sikandar (BPS-16) Abbottabad was arbitrarily placed senior to him at S. No. 08 who is respondent No. 3 in the appeal. There are arguable points for regular hearing of the appeal. Subject to all legal and factual objections, this appeal is admitted for 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 22.02.2022 before the D.B.

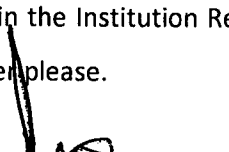


Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7361 /2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/09/2021	<p>The appeal of Mr. Naheed Ullah resubmitted today by Mr. M. Zafar Tahirkheli 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>2-</p> <p>This case is entrusted to S. Bench at Peshawar. Notice be issued to appellant/counsel for preliminary hearing to be put up there on <u>25/10/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Naheedullah Khan Assistant Bannu Public Library Bannu received today i.e. on 06.08.2021 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- The law under which appeal is filed is not mentioned.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Certificate be given to the effect that appellatant has not been filed any service appeal earlier on the subject matter before this Tribunal.
- 4- Appeal may be supported with by an affidavit duly attested by the Oath Commissioner.
- 5- Check List is not attached with the appeal.

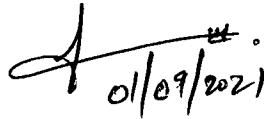
No. 1542 /S.T,

Dt. 06/08 /2021

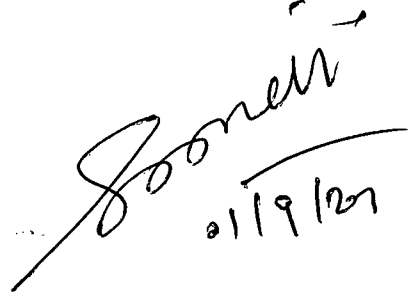

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

M.Zafar Tahirkheli Adv. Pesh.

As there was public holidays, therefore the undersign received the appeal on 1/09/2021. He requested that the resubmission of appeal may kindly be extended.

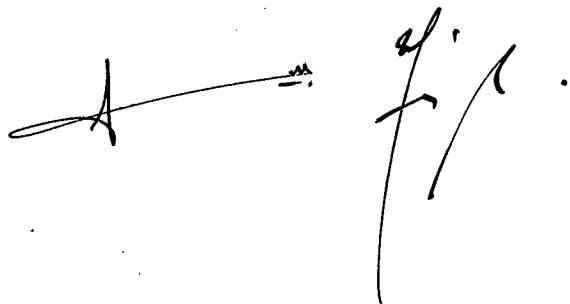

01/09/2021

15 days more asked to
complete.


01/09/2021

Note:

Duly Completed & Resubmitted.



BEFORE THE SERVICE TRIBUNAL, KHYBER PUKHTOONKHWA
PESHAWAR

Service Appeal No. 2361 / 2021

Naheed Ullah Khan

VERSUS Govt of Khyber Pakhtunkhwa etc.

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I N D E X

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S.No	Particulars	Annexure	Dates	Pages
1	Memo of Petition			1-3
2	Communication Letter	"A"	17-03-2021	4
3	Seniority List	"A1"	16-03-2021	5-6
4	Departmental Appeal	"B"	13-04-2021	7-9
5	Initial Appointment Order	"C"	10-08-1991	10
6	Promotion Order	"C1"	10-04-2017	11
7	Promotion Order	"C2"	22-08-2017	12
8	Promotion Order	"C3"	27-04-2005	13
9	Promotion Order	"C4"	16-06-2014	14
10	Seniority List	"D"	15-01-2021	15-17
11	Order	"E"	11-10-2018	18
12	Order	"F"	10-11-2007	19
13	Letter	"G"	13-06-2013	20
14	Letter	"G1"	28-06-2013	21
15	Letter	"G2"	08-07-2013	22
16	Letter	"G3"	11-07-2013	23
17	Letter	"G4"	14-11-2014	24
18	Letter	"G5"	06-01-2015	25
19	Order	"H"	22-08-2017	26
20	Vakalatnama		-	27

Date:- 06/ August, 2021

(Muhammad Zafar Tahirkheli)
Advocate,

(Ansar Ullah Khan)
Advocate

BEFORE THE SERVICE TRIBUNAL, KHYBER PUKHTOONKHWA
PESHAWAR

Service Appeal No. _____/2021

Naheed Ullah Khan
Assistant Bannu Public Library,
Bannu

Versus

1. Government of Khyber Pakhtunkhwa, through Secretary Higher Education Archives & Libraries Peshawar.
2. Director Archives & Libraries, besides MPA Hostels Peshawar Cantt.
3. Naseem Sikandar, Assistant BPS-16 Molana Muhammad Ishaq Library, Abbottabad.

APPEAL AGAINST THE IMPUGNED COMBINED SENIORITY LIST OF ASSISTANTS (BPS-16) RECORD ASSISTANT (BPS-16) AND SENIOR SCALE STENOGRAPHER (BPS-16), DIRECTORATE OF ARCHIVES & LIBRARIES AS IT STOOD ON 16-03-2021, COMMUNICATED VIDE LETTER DATED 17-03-2021. (Copies annexed "A & A1"), WHEREIN THE DEPARTMENTAL APPEAL OF THE APPELLANT DATED 13-04-2021 WAS NOT DECIDED TILL THE LAPS OF STATUTORY PERIOD OF LIMITATION. (Copy annexed "B")

"Prayer"

- (a) By accepting this appeal and setting aside the impugned seniority list dated 16-03-2021, communicated on 17-03-2021 and amending the same by placing the appellant at serial No. 09 of the said seniority list.
- (b) Any other relief deemed appropriate may also be granted in addition to the relief prayed above.

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Respectfully Sheweth,

1. The appellant being qualified and eligible was selected and appointed as Naib Qasid on 10-08-1991. He was graciously granted promotion vide different orders / notifications till his last promotion as Assistant (BPS-16) dated 10-04-2017. He is currently serving as Assistant (BPS-16), Bannu Library Bannu to the utmost satisfaction of his superiors. (Copy of promotion order annexed "C to C4")
2. That the worthy department has circulated a revised / updated combined seniority list of holders of post of Assistant (BPS-16), Record Assistant (BPS-16) and senior scale Stenographer (BPS-16), Directorate of Archives & Libraries as it stood on 16-03-2021, vide letter No. 430/3/52/DA dated 17-03-2021. (Copies annexed "A & A1")
3. That the appellant was arbitrarily placed at serial No. 10 of the impugned seniority list instead of his actual place of seniority at serial No. 09, wherein

one Mst. Naseem Sikandar Assistant (BPS-16) Abbottabad, was arbitrarily placed senior to him at serial No. 08.

4. That previously vide combined seniority list of the Directorate of Archives & Libraries in respect of Assistant, Record Assistant, Senior Scale Stenographer (BPS-16) as it stood on 15-01-2021, the appellant was rightly placed at his proper place of seniority at serial No. 10 of the list.

It is necessary to mention that Naseem Sikandar respondent No. 03 was not even promoted at the time of the issuance of seniority list dated 15-01-2021. She was later on promoted on 11-10-2018. (Copies annexed "D & E")

5. That the worthy Department without any prior notice or intimation to the appellant, arbitrary placed Mst. Naseem Sikander, respondent No. 03 at serial No. 08 of the revised seniority list, which has adversely effected and changed the seniority position of the appellant with malafide intent.
6. The appellant challenged the impugned seniority list through his departmental appeal dated 13-04-2021, which was not decided till the statutory period of limitation. (annex "B")

Feeling aggrieved and finding no other appropriate remedy, the appellant has been constrained to approach the Hon'ble Tribunal inter-alia on the following;

Grounds

- a) The respondent department has acted in a most arbitrary manner while placing respondent No. 03 above him without any prior notice or plausible explanation, which needs to be set right by this Hon'ble tribunal.
- b) That one Mutabar Khan, Assistant (BPS-16) placed at serial No. 2 of the prior seniority list dated 15-01-2021 (annexed "D") passed away during his service and consequently the appellant was required to be placed at serial No. 09 of the list, which was however not done and one Mst. Naseem Sikandar was arbitrarily placed above the appellant in the impugned revised seniority list as it stood on 16-03-2021.
- c) That the worthy Department without any prior notice or intimation to the appellant has arbitrary placed Mst. Naseem Sikander at serial No. 08 of the revised seniority list, which has adversely effected and changed the seniority position of the appellant.
- d) It is worth mentioning that Mst. Naseem Sikander, then Jr. Clerk, APL, Abbottabad was charged of willful absence & drawing salaries from two public organization i.e. Public Library, Abbottabad and Sir Sahibzada Abdul Qayum Auqaf Model School, Abbottabad. On proving of the charges, major penalty of "Dismissal from Service" was imposed upon her vide No. 1624-29/3/10/DA dated 04-11-2003. She filed petition against said penalty in Peshawar High Court (Abbottabad Bench) and on decision of the court, she was reinstated into service on 10-11-2007. (Copy annexed "F")
- e) That apart from above the Mst. Naseem Sikandar was asked her opinion to avail promotion as Senior Clerk vide letter dated 13-06-2013 and 28-06-2013. She declined to avail the option of promotion vide letter dispatched by Librarian Public Library Abbottabad dated 08-07-2013, received at Directorate dated 11-07-2013.

That once again she was served with letter dated 14-11-2014 asking for her willingness for promotion to next higher scale as Senior Clerk (BPS-14). She declined to avail the opportunity of promotion for the second time vide letter received by Directorate on 06-01-2015. (Copies annexed "G to G5")

- f) She was later on promoted as Senior Clerk (BPS-14) on 22-08-2017, whereas the appellant was promoted as Senior Clerk on 16-06-2014, 03 years prior to the promotion of Mst. Naseem Sikandar. (Copy annexed "H")
- g) That similarly Mst. Naseem Sikandar was promoted as Assistant on 15-03-2021, whereas the appellant was promoted as Assistant (BPS-16) on 10-04-2017, almost 04 years prior to her promotion. (annex "C3 & E")
- h) The appellant is lawfully entitled to be placed at S. No. 09 of the impugned seniority list dated 16-03-2021, but has been relegated to a lower position at S. No. 10 without showing any plausible explanation.
- i) That according to section 8 sub section 4 of KP Civil Servants Act 1973, "Seniority in a post, service or cadre to which a civil servant is promoted, shall take effect from the date of regular appointment to that post."


The appellant was promoted to the post of Senior Clerk (BPS-14) and as an Assistant (BPS-16), much prior to that of Mst. Naseem Sikandar and was lawfully required to be placed at his correct place of seniority at serial No. 09 of the list dated 16-03-2021.

- j) The appellant has been accorded arbitrary treatment. His seniority would reckon from the date of his promotion to the post of Assistant (BPS-16) dated 10-04-2017 and that of Mst. Naseem Sikandar w.e.f 15-03-2021.
- k) It is quite astonishing that Mst. Naseem Sikandar was allowed regular promotion as an Assistant (BPS-16) on 15-03-2021 and on the very next day she was placed at serial No. 08 of the impugned seniority list as it stood on 16-03-2021.
- l) The impugned action on the part of the worthy department is thus not only arbitrary, discriminatory but is also against the principles of equity, law, justice and propriety, subject to be set right by the worthy Service Tribunal.

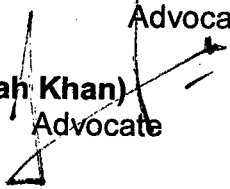
In view of the above, it is most respectfully submitted that the impugned seniority list of Assistant (BPS-16) as it stood on 16-03-2021, may kindly be set aside and the respondent department may kindly be directed to amend the impugned seniority list by placing the appellant at S. No. 09 instead of S. No. 10 of the said list above Mst. Naseem Sikandar.

Dated: 06th August, 2021


Appellant,

Through, 
(Muhammad Zafar Tahirkheli)
Advocate

(Ansar Ullah Khan)
Advocate



ANNEXURE A

DIRECTORATE OF ARCHIVES & LIBRARIES,
KHYBER PAKHTUNKHWA, PESHAWAR.

NO. 430/3/52/DA. Dated 17/03/2021.

(4)

To,
All concerned, Directorate of Archives & Libraries,
Khyber Pakhtunkhwa.

Subject: REVISED/UPDATED COMBINED SENIORITY LIST OF HOLDERS OF THE POSTS OF ASSISTANT (BPS-16), RECORD ASSISTANT (BPS-16) AND SENIOR SCALE STENOGRAPHER (BS-16) IN DIRECTORATE OF ARCHIVES & LIBRARIES, KHYBER PAKHTUNKHWA AS IT STOOD ON 16-03-2021.

Enclosed please find herewith the above referred list for your information and signature. If you have any objection/reservation regarding your seniority position contained in the list, the same along with relevant record may be forwarded to this office in writing by 22-03-2021 for rectification, otherwise, the list will be considered undisputed and will accordingly be notified.

(Zahir Ullah Khan)
Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar

Endst: No. & Date Even.

Copy of the above referred seniority list is forwarded to: -

- 01- The Section Officer (C-IV), Higher Education, Archives & Libraries Department with reference to letter No. SO(C-IV)/HED/1-6/ Ms. Nasim Sikandar/2020/4489-90 dated 28-02-2020.
- 02- The Incharges, Public Libraries at Peshawar, Nowshera, Mardan, Swabi, Swat, Dir Lower, Chitral, DI Khan, Lakki Marwat, Bannu, Kohat, Haripur and Abbottabad with direction to circulate the list amongst all concerned for their information.
- 03- For Circulation amongst concerned staff of Directorate of Archives & Libraries, Peshawar.

Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar

TRUE COPY


SENIOR SCALE STENOGRAPHER (BS-16), DIRECTORATE OF ARCHIVES & LIBRARIES, KHYBER PAKHTUNKHWA AS IT STOOD ON 16-03-2021.

S.#	Name of Officer	Qualification	Date of Birth with Domicile/Zone	Date of 1 st Entry into Govt: Service	Designation/ Date of 1 st appointment in the Office.	Date of regular promotion to the present post.	By Initial recruitment/ By Promotion.	Remarks.
1.	Sabir Ali, Assistant (BPS-16), Public Library, D.I Khan.	M.A	15-04-1969 Peshawar-II	07.04.1991 Junior Clerk (BPS-05)	07.04.1991 Junior Clerk (BPS-05)	18-10-2011 Assistant (BPS-14) 20-05-2014 Assistant (BPS-16)	By Promotion	-do-
2.	Josephine Sardar, Assistant (BPS-16), RBC, Peshawar.	F. A	16-12-1968 Peshawar-II	10-08-1991 Junior Clerk (BPS-05)	10-08-1991 Junior Clerk (BPS-05)	16-01-2013 Assistant (BPS-14) 20-05-2014 Assistant (BPS-16)	By promotion.	-do-
3.	Mohib Ullah, Assistant (BPS-16), DA&Ls, Peshawar.	B. A	14-08-1969 Peshawar-II	10-08-1991 Katib (BPS-05)	10-08-1991 Katib (BPS-05)	31-05-2013 Assistant (BPS-14) 20-05-2014 Assistant (BPS-16)	By promotion.	-do- <i>[Handwritten signature]</i> 18/03/21
4.	Mukhtar Ahmad, Assistant (BPS-16) Public Library, Chitral.	M.A	10-02-1990 Chitral-III	30-05-2014 Assistant (BPS-16)	30-05-2014 Assistant (BBPS-16)	30-05-2014 Assistant (BPS-16)	By Initial	
5.	Sharbat Ali, Record Assistant (BPS-16) DA&Ls, Peshawar.	F. A	02-01-1967 Peshawar-II	01-04-1992 Junior Clerk (BPS-05)	01-04-1992 Junior Clerk (BPS-05)	25-02-2015 Record Assistant (BPS-16)	By Promotion	
6.	Muhammad Arshad, Assistant (BPS-16), Public Library, Haripur.	SSC	21-06-1972 Haripur-V	10-08-1991 Naib Qasid (BPS-01)	10-08-1991 N. Qasid (BPS-01)	25-02-2015 Assistant (BPS-16)	By Promotion	
7.	Muhammad Ishaq, Sr. Scale Stenographer BS-16, Peshawar.	M.A	02-02-1964 Mardan-II	01-04-1987 BPS-12	01-04-1987 BPS-12	18-03-2016 Senior Scale Stenographer (BPS-16)	By Promotion	
8.	Nasim Sikandar, Assistant (BPS-16), Abbottabad.	M.A	01-09-1969 Abbottabad-V	04-08-1994 Jr. Clerk (BS-05)	22-08-2017 Senior Clerk (BS-14)	15-03-2021 Assistant (BPS-16)	By Promotion	
9.	Muhammad Yousaf, Assistant BS-16, Public Library, Charsadda.	SSC	03-04-1972 Mardan-II	14-11-1990 Naib Qasid (BS-01)	14-11-1990 Naib Qasid (BS-01)	10-04-2017 Assistant (BS-16)	By promotion	
10.	Naheed Ullah Khan, Assistant (BPS-16), Public Library, Bannu.	B. A	10-04-1971 Bannu-IV	10-08-1991 Naib Qasid (BS-01)	10-08-1991 Naib Qasid (BS-01)	10-04-2017 Assistant (BPS-16)	By promotion.	
11.	Abdul Wassay, Assistant (BPS-16), DA&Ls, Peshawar.	BA. Hons history	10-04-1989 Karak-IV	15-08-2017 Assistant (BPS-16)	15-08-2017 Assistant (BPS-16)	15-08-2017 Assistant (BPS-16)	By initial	

ANNEXURE A

A

ANNEXURE 6

12.	Saima Kiran, Assistant (BS-16), DA&LS, Peshawar.	B. A	<u>13-01-1983</u> Bannu-IV	<u>09-10-2007</u> Jr. Clerk (BS-07)	<u>04-10-2007</u> Jr. Clerk (BS-07)	<u>15-05-2018</u> Assistant (BPS-16)	By Promotion.	
13.	Zafar Ullah, Assistant (BPS-16), DA&LS, Peshawar.	Bio-Tech (04-yreas)	<u>27-04-1988</u> Bannu-IV	<u>09-08-2018</u> Assistant (BPS-16)	<u>09-08-2018</u> Assistant (BPS-16)	<u>09-08-2018</u> Assistant (BPS-16)	By initial	
14.	Atif Aman, Assistant (BPS-16), Swat.	M.A (Political Science)	<u>01-02-1987</u> Swabi-II	<u>29-09-2020</u> Assistant (BPS-16)	<u>29-09-2020</u> Assistant (BPS-16)	<u>29-09-2020</u> Assistant (BPS-16)	By initial	Overall merit marks-174
15.	Ayesha Qureshi, Assistant (BPS-16), DA&LS, Peshawar.	MLIS	<u>02-03-1993</u> Abbottabad-V	<u>29-09-2020</u> Assistant (BPS-16)	<u>29-09-2020</u> Assistant (BPS-16)	<u>29-09-2020</u> Assistant (BPS-16)	By initial	Overall merit marks-151
16.	Maryam Sahibzada, Assistant (BPS-16), DA&LS, Peshawar.	Msc Zoology	<u>27-12-1991</u> Bannu-IV	<u>13-10-2020</u> Assistant (BPS-16)	<u>13-10-2020</u> Assistant (BPS-16)	<u>13-10-2020</u> Assistant (BPS-16)	By initial	Overall merit marks-147
17.	Saleh Mahmood, Assistant (BPS-16), Lakki Marwat.	SSC	<u>10-04-1979</u> Bannu-IV	<u>12-10-2007</u> Jr. Clerk (BS-11)	<u>22-08-2017</u> Senior Clerk (BS-14)	<u>15-03-2021</u> Assistant (BPS-16)	By Promotion	-
18.	Khalid Usman, Assistant (BPS-16), Khushal Khan Memorial Library, Nowshera.	M.A	<u>12-02-1978</u> Swabi-II	<u>27-10-2007</u> Jr. Clerk (BS-07)	<u>22-08-2017</u> Senior Clerk (BS-14)	<u>15-03-2021</u> Assistant (BPS-16)	By Promotion	-
19.	Sajila, Assistant (BPS-16), Peshawar.	F. A	<u>18-02-1986</u> Peshawar-II	<u>13-11-2007</u> Jr. Clerk (BS-11)	<u>22-08-2017</u> Senior Clerk (BS-14)	<u>15-03-2021</u> Assistant (BPS-16)	By Promotion	-
20.	Fazal Wahab, Assistant (BPS-16), Public Library, Swabi	B. Com	<u>04-03-1981</u> Swabi-II	<u>18-12-2007</u> Jr. Clerk (BPS-07)	<u>18-12-2007</u> Jr. Clerk BS-11 <u>22-08-2017</u> Senior Clerk (BS-14)	<u>15-03-2021</u> Assistant (BS-16)	By Promotion	

Note: - Seniority position of the official at S. No 08 has been determined in light of inquiry report communicated vide letter No. SO(C-IV)/HED/1-6/ Ms. Nasim Sikandar/2020/4489-90 dated 28-02-2020.

(Zahir Ullah Khan)
Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

TRUE COPY

ANNEXURE

OFFICE OF THE LIBRARIAN,
PUBLIC LIBRARY, BANNU

No. 101/3/1/DA Dated 13-04-2021.

B

7


To

The Chief Librarian,
Directorate of Archives & Libraries, Peshawar.

Subject: -

**DEPARTMENTAL APPEAL/REPRESENTATION/REVIEW AGAINST THE
IMPUGNED COMBINED SENIORITY LIST OF ASSISTANTS(BS-16),
RECORD ASSISTANT(BS-16) AND SENIOR SCALE STENOGRAPHERS(BS-
16), DIRECTORATE OF ARCHIVES & LIBRARIES AS IT STOOD ON 16-03-
2021, COMMUNICATED VIDE LETTER DATED 17-03-2021.**

Enclosed please find herewith my self explanatory departmental appeal on the subject noted above for sympathetic consideration please.



(Naheed Ullah Khan)
Incharge/Assistant,
Public Library, Bannu.

TRUE COPY

To,

The Secretary Higher Education,
Archives & Libraries Government of KPK,
Peshawar.

Through: Director of Archives & Libraries Khyber Pakhtunkhwa, Peshawar.

**DEPARTMENTAL APPEAL / REPRESENTATION / REVIEW
AGAINST THE IMPUGNED COMBINED SENIORITY LIST OF
ASSISTANTS (BPS-16) RECORD ASSISTANT (BPS-16) AND SENIOR
SCALE STENOGRAPHER (BPS-16), DIRECTORATE OF ARCHIVES &
LIBRARIES AS IT STOOD ON 16-03-2021. COMMUNICATED VIDE
LETTER DATED 17-03-2021.**

Respectfully Sheweth,

Naheed Ullah Khan, Assistant (BPS-16) Bannu Public Library Bannu, the appellant submits most respectfully the following for your kind consideration and favour of acceptance:-

1. The appellant being qualified and eligible was selected and appointed as Naib Qasid on 10-08-1991. He was graciously granted promotion vide different orders / notifications till his last promotion as Assistant (BPS-16) dated 10-04-2017. He is currently serving as Assistant (BPS-16), Bannu Library Bannu to the utmost satisfaction of his superiors.
2. That the worthy department has circulated a revised / updated combined seniority list of holders of post of Assistant (BPS-16), Record Assistant (BPS-16) and senior scale Stenographer (BPS-16), Directorate of Archives & Libraries as it stood on 16-03-2021, vide letter No. 430/3/52/DA dated 17-03-2021.
3. That the appellant has been arbitrarily placed at serial No. 10 of the impugned seniority list instead of his actual place of seniority at serial No. 09, wherein one Mst. Naseem Sikandar Assistant (BPS-16) Abbottabad, has been arbitrarily placed senior to him at serial No. 08.
4. That previously vide combined seniority list of the Directorate of Archives & Libraries in respect of Assistant, Record Assistant, Senior Scale Stenographer (BPS-16) as it stood on 15-01-2021, the appellant was rightly placed at his proper place of seniority at serial No. 10 of the list.
That one Mutabar Khan, Assistant (BPS-16) placed at serial No. 2 of the list dated 15-01-2021, passed away during his service and consequently the appellant was required to be placed at serial No. 09 of the list, which was however not done and one Mst. Naseem Sikandar was placed above the appellant in the impugned revised seniority list as it stood on 16-03-2021.
5. That the worthy Department without any prior notice or intimation to the appellant has arbitrary placed Mst. Naseem Sikander at serial No. 08 of the revised seniority list, which has adversely effected and changed the seniority position of the appellant.
6. It is worth mentioning that Mst. Naseem Sikander, then Jr. Clerk, APL, Abbottabad was charged of wilful absence & drawing salaries from two public organization i.e. Public Library, Abbottabad and Sir Sahibzada Abdul Qayum Auqaf Model School, Abbottabad. On proving of the charges, major penalty of "Dismissal from Service" was imposed upon her vide No. 1624-29/3/10/DA dated 04-11-2003. She filed petition against said penalty in Peshawar High

TRUE COPY

Court (Abbottabad Bench) and on decision of the court, she was reinstated into service on 09-09-2004.

- 7. That apart from above the Mst. Naseem Sikandar was asked her opinion to avail promotion as Senior Clerk vide letter dated 13-06-2013 and 28-06-2013. She declined to avail the option of promotion vide letter dated 11-07-2013.

That once again she was served with letter dated 14-11-2014 asking for her willingness for promotion to next higher scale as Senior Clerk (BPS-14). She declined to avail the opportunity of promotion once again vide letter dated 06-01-2015.

She was later on promoted as Senior Clerk on 22-08-2017, whereas the appellant was promoted as Senior Clerk on 16-06-2014, 03 years prior to the promotion of Mst. Naseem Sikandar.

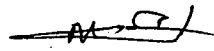
- 8. That similarly Naseem Sikandar was promoted as Assistant on 15-03-2021, whereas the appellant was promoted as Assistant (BPS-16) on 10-04-2017, almost 04 years prior to her promotion.
- 9. The appellant is lawfully entitled to be placed at S. No. 09 of the impugned seniority list dated 16-03-2021, but has been relegated to a lower position at S. No. 10 without showing any plausible explanation.
- 10. That according to section 8 sub section 4 of KP Civil Servants Act 1973, "Seniority in a post, service or cadre to which a civil servant is promoted, shall take effect from the date of regular appointment to that post."


The appellant was promoted to the post of Senior Clerk (BPS-14) and as an Assistant (BPS-16), much prior to that of Mst. Naseem Sikandar and was lawfully required to be placed at his correct place of seniority at serial No. 09 of the list dated 16-03-2021.

- 11. The appellant has been accorded arbitrary treatment. His seniority would reckon from the date of his promotion to the post of Assistant (BPS-16) dated 10-04-2017 and that of Mst. Naseem Sikandar w.e.f 15-03-2021.
- 12. It is quite astonishing that Mst. Naseem Sikandar was allowed regular promotion as an Assistant (BPS-16) on 15-03-2021 and on the very next day she was placed at serial No. 08 of the impugned seniority list as it stood on 16-03-2021.
- 13. The impugned action on the part of the worthy department is thus not only arbitrary, discriminatory but is also against the principles of equity, law, justice and propriety, subject to be set right by the worthy Appellate Authority.

In view of the above, it is most respectfully submitted that the impugned seniority list of Assistant (BPS-16) as it stood on 16-03-2021, may kindly be set aside by amending the same and placing the appellant at S. No. 09 instead of S. No. 10 of the said list above Mst. Naseem Sikandar.

Dated: 13th April, 2021


(Naheed Ullah Khan)
Assistant
Bannu Public Library Bannu


TRUE COPY

Note:

One copy in advance to the worthy Secretary Higher Education Libraries & Archives, Khyber Pakhtunkhwa, Peshawar.

10

Dated Pesh: the 16th Aug:, 1991.

ORDER

ANNEXURE C

No. _____/3/1/DA. The following appointments are hereby made in the Directorate of Archives & Libraries, NWFP, Peshawar purely on temporary basis with effect from the date of taking over:-

1. Mr. Muhammad Arshed S/O Muhammad Zaman C/O Dr. Manzoor Ahmed Medical 'A' Ward L.R.H. Peshawar is hereby appointed as Naib Qasid (BFS-4) against an existing vacancy.
2. Mr. Nahid Ullah S/O ~~Harmed~~ Ullah Village: Sarmast Merakhel P/Office Merakhel, Tehsil & Distt: Banni and Mr. Muhammad Zulfiqar S/O ~~Qasim~~ Gul Mohalla Multan Baba, Village Landi Arbab, Tehsil & Distt: Peshawar are hereby appointed as Naib Qasid (BFS-1) against newly created posts.

Their appointments are subject to medical fitness and verification of antecedents and is also liable to termination without assigning any reason.

Sd/
(TARIQ MANSOOR JALALI)
Director of Archives and
Libraries NWFP, Peshawar.

Endst: No. 267-11 /3/1/DA. Dated Peshawar the 16th Aug:, 1991.

Copy forwarded to:-

1. The Accountant General, NWFP, Peshawar.
2. Mr. Muhammad Arshad S/O Muhammad Zaman Care of Dr. Manzoor Ahmed Medical 'A' Ward, L.R.H. ~~Eng~~ Peshawar.
3. Mr. Nahid Ullah S/O ~~Harmed~~ Ullah, Village Sarmast Merakhel P/Office Merakhel, Tehsil & Distt: Bannu.
4. Mr. Muhammad Zulfiqar S/O ~~Qasim~~ Gul, Mohalla Multan Baba Village Landi Arbab, Tehsil & Distt: Peshawar.
5. Office Order File.

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Tariq Jalali
Director of Archives and
Libraries NWFP, Peshawar

Director of
Peshawar

(134) (11)

GOVERNMENT OF KHYBER PAKTUNKHWA,
DIRECTORATE OF ARCHIVES & LIBRARIES,

Dated Peshawar the _____ April, 2017.

ORDER

ANNEXURE C,

No. _____/3/52/Official/DA. Consequent upon the approval of Departmental Selection/Promotion Committee of Directorate of Archives & Libraries, Khyber Pakhtunkhwa made in its meeting held on 06-04-2017, the following promotions are hereby order with immediate effect: -

1. Promotion of Mr. Muhammad Yousaf, Senior Clerk (BPS-14), Directorate of Archives & Libraries, Khyber Pakhtunkhwa, Peshawar, as Assistant (BPS-16) against the newly created post in Kohat Public Library, Kohat, on acting charge basis.
2. Promotion of Mr. Naheed Ullah Khan, Senior Clerk (BPS-14), Directorate of Archives & Libraries, Khyber Pakhtunkhwa, Peshawar, as Assistant (BPS-16) against the existing vacant post in Bannu Public Library Bannu, on acting charge basis.

03- The above referred officials will be on probation for a period of one year, extendable to another year in terms of Rule-15 of APT Rule, 1989.

(Zahir Ullah Khan)

Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar

Endat: No. 1242-49/3/52/Official/DA Dated Peshawar the 10th April, 2017,

Copy forwarded to;

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The District Accounts Officer, Bannu.
3. The District Accounts Officer, Kohat.
4. The Section Officer (C-IV), Higher Education, Archives & Libraries Department, Khyber Pakhtunkhwa, Peshawar.
5. The Librarian, Bannu Public Library Bannu.
6. The Incharge, Kohat Public Library, Kohat.
7. Concerned Officials.
8. Office Orders File.

Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar

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16
Naheed Ullah Khan
P

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DIRECTORATE OF ARCHIVES & LIBRARIES,
KHYBER PAKHTUNKHWA, PESHAWAR

12

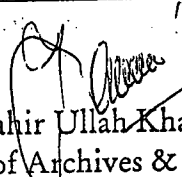
Dated Peshawar the 22nd August, 2017.

ORDER

ANNEXURE C2

No. 1330 /3/52/Official/DA. Consequent upon the approval of Departmental Promotion/Selection Committee of the Directorate of Archives & Libraries, Khyber Pakhtunkhwa, the competent authority is pleased to regularize the following acting charge basis promotions with effect from the dates shown against names of the officials: -

S.No.	Name of Official.	Regularization of promotion as Assistant with effect from .
1.	Muhammad Yousaf, Assistant(BPS-16), Kohat Public Library, Kohat.	26-05-2017
2.	Naheed Ullah Khan, Assistant(BPS-16), Bannu Public Library, Bannu.	16-06-2017


(Zahir Ullah Khan)
Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. _____/3/52/Official/DA Dated Peshawar the _____ August, 2017.

Copy forwarded to:

- 1) The District Accounts Officer, Kohat.
- 2) The District Accounts Officer, Bannu.
- 3) The Incharge, Kohat Public Library, Kohat.
- 4) The Librarian, Bannu Public Library, Bannu.
- 5) The Officials Concerned.
- 6) Office Orders File.

Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

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File

(Signature)

(13)

GOVERNMENT OF NWFP,
DIRECTORATE OF ARCHIVES & LIBRARIES,

Dated Peshawar the _____ April, 2005

ANNEXURE C3

O R D E R

No. _____/3/52/Official/DA. Consequent upon the approval of the Departmental Promotion/Selection Committee of the Directorate of Archives and Libraries, Mr. Naheed Ullah Khan, Mender (BPS-02), Directorate of Archives & Libraries, NWFP, Peshawar is hereby promoted as Junior Clerk (BPS-05) against the post vacated by Mr. Sabir Ali, Junior Clerk (BPS-05) with immediate effect.

(Signature)

(Zahir Ullah Khan)
Director of Archives & Libraries,
NWFP, Peshawar

Endst: No. 453-56 /3/52/Officials/DA Dated Peshawar the 27/4 April, 2005.

Copy forwarded to: -

- 1- The Accountant General, NWFP, Peshawar.
- ✓* 2- The Section Officer (Trg :), Higher Education, Archives & Libraries Department.
- 3- The Official Concerned.
- 4- The Office Orders File.

Submitted in Subj. File

(Signature)
Director of Archives & Libraries
NWFP, Peshawar

(Signature)

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ANNEXURE 4

GOVERNMENT OF KHYBER PAKHTUNKHWA,
DIRECTORATE OF ARCHIVES & LIBRARIES,

Dated Peshawar the _____ June, 2014.

ORDER

No. _____ /3/52/Official/DA. Consequent upon the recommendations of Departmental Promotion/Selection Committee of the Directorate of Archives & Libraries, Khyber Pakhtunkhwa, the following promotions/regularization of promotion are hereby ordered in the Directorate of Archives & Libraries, Khyber Pakhtunkhwa with immediate effect:-

- (i) Mr. Naheed Ullah, Junior Clerk (BPS-11), Mufti Mahmood Public Library, D.I.Khan, is promoted as Senior Clerk (BPS-14) and posted against the existing vacancy in the Directorate of Archives & Libraries, Peshawar.
- (ii) Mr. Abid Ullah, Daftari (BPS-02), Directorate of Archives & Libraries, Peshawar is promoted as Junior Clerk (BPS-11) on acting charge basis and posted against the existing vacancy in the Directorate of Archives & Libraries, Peshawar.
- (iii) Acting charge based promotion of Mr. Abdullah, Junior Clerk (BPS-11), Directorate of Archives & Libraries, Peshawar is regularized w.e.f. 27-05-2014.

Note: - The post of Senior Clerk & Junior Clerk have been upgraded from BPS-07 & 09 to 14 & 11 vide Finance Department's Notification No. FD/SO(FR)10-22/2014 dated 20-05-2014.

(Zahir Ullah Khan)
Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

Endst. No. 1561-69 /3/52/Official/DA Dated Peshawar the 16 June, 2014.

Copy forwarded to:

- 1) The Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2) The District Accounts Officer, D.I.Khan.
- 3) The Section Officer (Trg), Higher Education, Archives & Libraries, Khyber Pakhtunkhwa.
- 4) The Librarian, Mufti Mahmood Public Library, D.I.Khan.
- 5) The Official(s) Concerned.
- 6) Office Orders File.
- 7) Personal Files.

Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

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Endst: No. _____/3/52/Official/DA Dated Peshawar the _____ August, 2017.

Copy forwarded to:

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar
2. The District Accounts Officer, Abbottabad.
3. The District Accounts Officer, Swabi.
4. The District Accounts Officer, Bannu.
5. The District Accounts Officer, Haripur.
6. The District Accounts Officer, Dir Lower.
7. The District Accounts Officer, Swat.
8. The Section Officer(C-IV.), Higher Education, Archives & Libraries Department, Khyber Pakhtunkhwa, Peshawar.
9. The Librarian, Abbottabad Public Library, Abbottabad.
10. The Librarian, Swabi Public Library, Swabi.
11. The Librarian, Bannu Public Library, Bannu.
12. The Librarian, Hakim Abdus Salam Public Library, Haripur.
13. The Librarian, Timergara Public Library, Dir Lower.
14. Officials Concerned.
15. Office Orders File.

Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

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ANNEXIURE

DIRECTORATE OF ARCHIVES & LIBRARIES,
KHYBER PAKHTUNKHWA, PESHAWAR


Dated Peshawar the 22nd Augusts, 2017.

ORDER

No. 1337 /3/52/Official/DA. Consequent upon the approval of Departmental Promotion/Selection Committee of the Directorate of Archives & Libraries, Khyber Pakhtunkhwa, the competent authority is pleased to order as follows:

- i- Promotion of Mrs. Nasim Sikandar, Junior Clerk(BPS-11), Public Library, Abbottabad as Senior Clerk(BPS-14) against the newly created post in Public Library, Abbottabad. The promotion will be subject to final decision in the departmental appeal filed by the said official for granting of retrospective seniority.
- ii- Promotion of Mr. Saleh Mahmood, Junior Clerk(BPS-11), Public Library, Bannu as Senior Clerk(BPS-14) against the newly created post in Public Library, Bannu, Directorate of Archives & Libraries, Khyber Pakhtunkhwa.
- iii- Promotion of Mr. Khalid Usman, Junior Clerk(BPS-11), Public Library, Swabi as Senior Clerk(BPS-14) against the newly created post in Rahman Baba Public Library Complex, Hazar Khwani, Peshawar, Directorate of Archives & Libraries, Khyber Pakhtunkhwa.
- iv- Promotion of Mrs. Sajila, Junior Clerk(BPS-11), Directorate of Archives & Libraries, Peshawar as Senior Clerk(BPS-14) against the existing vacancy in Directorate of Archives & Libraries, Peshawar.
- v- Promotion of Mr. Sham Ul Islam, Junior Clerk(BPS-11), Public Library, Swat, as Senior Clerk(BPS-14) against the newly created post in Timergara Public Library, Dir Lower, Directorate of Archives & Libraries, Khyber Pakhtunkhwa.
- vi- Promotion of Mr. Fazal Wahab, Junior Clerk(BPS-11), Public Library, Swabi as Senior Clerk(BPS-14) against the newly created post in Hakim Abdus Salaam Public Library, Haripur, Directorate of Archives & Libraries, Khyber Pakhtunkhwa.
- vii- Promotion of Mr. Wajid Ullah, Junior Clerk(BPS-11), Directorate of Archives & Libraries, Peshawar as Senior Clerk(BPS-14) against the existing vacancy in Directorate of Archives & Libraries, Peshawar.
- viii- Promotion of Mr. Hidayat Ullah, Junior Clerk(BPS-11), Public Library, Lakki Marwat as Senior Clerk(BPS-14) against the existing vacancy in Directorate of Archives & Libraries, Peshawar.

03- The above referred officials will be on probation for a period of one year, extendable for further one year, under rule-15 of the Khyber Pakhtunkhwa Civil Servants(Appointment, Promotion and Transfer) Rules, 1989.


(Zahir Ullah Khan)
Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

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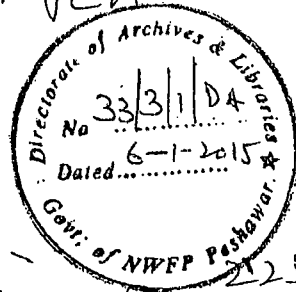
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ANNEXURE 95

SUBMITTED 3/52

(25)

The Director
Archives & Libraries
Department
Govt of Jammu & Kashmir
Subject: Promotion of Clerk



Refer your letter No 2256/3/14 dated 14 Nov 2014. Due to some domestic affairs I am unable to avail the chance of my promotion. So I may be given the chance below and oblige

Yours Truly
Nasir
Nasir Sik
Assistant Director
Libraries

DD/AD (Dev)
for a

ASSISTANT DIRECTOR
Directorate of Archives & Libraries
Peshawar

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Annex-E

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DIRECTORATE OF ARCHIVES & LIBRARIES
KHYBER PAKHTUNKHWA, PESHAWAR

Mrs. Naseem Sikandar,
Junior Clerk,
Abbottabad Public Library
Abbottabad.

No. 2256/31/DA & L

Dated Peshawar the 14th November, 2014

PROMOTION AS SENIOR CLERK

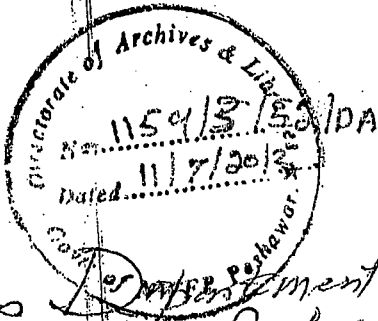
I am directed to inform you that a post of Senior Clerk (BPS-14) is lying vacant at the Directorate of Archives & Libraries, Khyber Pakhtunkhwa, Peshawar. According to the Notified Rules, the post of Senior Clerk will be filled by promotion from amongst the holder of the post of Junior Clerk. According to the Seniority list of Junior Clerks you are the senior most due for promotion as Senior Clerk. Earlier you twice give way your promotion, if you are still unwilling in the future then you are directed to attend this office and submit your unwillingness in written to the Director personally.

Handwritten signature/initials

Handwritten signature

(MUHAMMAD ZAMAN)
Assistant Director,
Directorate of Archives & Libraries,
Khyber Pakhtunkhwa,
Peshawar

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ANNEXURE

93

(23)

The Director
Archives & Library Department
Khyber Pakhtunkhwa, Peshawar

Subject: Opinion regarding award of Promotion as S/Comm

R/B

Reference letter NO 1227/3/52/DA Dated 1/11/2012 and letter # 1499/3/52/DA Dated 28/7/2013 on the subject stated above. I have the honor to bring in your kind notice that the department granted you a chance of promotion from BPS-7 to BPS-8 but due to some reservations of Domestic pay as given below.

- i. That My elder son is the student of C.I. under the BISE Abbottabad.
- ii. My daughter is a regular student of Army Burn Hall Girls School & College.
- iii. My little son is reading in class prep Army Burn Hall School/Boys Junior Sec.
- iv. I am suffering for so many diseases under treatment of Specialist Doctors & Ayub medical complex.
- v. My old age Mother of 65 yrs depends on me and she is suffering for High B.P. pressure, Diabetes & Eyes and
- vi. Domestic look after and all related affairs are my responsibility.

Therefore in the light of above facts & considerations I am unable to award the chance of this promotion.

Yours Truly
Nasim Sikandar

dp/syad (E/D)

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affair will meet

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From Public Library Abbottabad.

No. 1266 Dated. 8/7/2013

ANNEXURE

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To

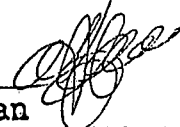
The Director,
Archives & Libraries Department
Khyber Pakhtun Khwa, Peshawar.


Subject:- PROMOTION AS SENIOR CLERK
OPTION REGARDING AVAILING

R/Sir,

Enclosed please find herewith an original application in respect of Mrs Nasim Sikandar J/Clerk BPS-07 for further necessary action please.

Yours Truly,


Librarian
Public Library, Abbottabad


ASSISTANT DIRECTOR

Directorate of Archives & Libraries
Khyber Pakhtunkhwa Peshawar


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REMINDER

ANNEXURE 6/1

Phone: - 091-9210100

DIRECTORATE OF ARCHIVES & LIBRARIES,
KHYBER PAKHTUNKHWA, PESHAWAR.

(21)

No. 1499 /3/52/DA Dated 28th June, 2013.

To,

Mrs. Nasim Sikandar, Junior Clerk,
Abbottabad Public Library, Allama Iqbal Road, Abbottabad.

Subject: -

OPTION REGARDING AVAILING PROMOTION AS SENIOR
CLERK (BPS-09)

Memo:

Reply of this office letter No. 1227/3/52/DA dated 13-06-2013 is still awaited on your part and therefore, you are again directed to submit your reply/option by 06-07-2013, positively.

(Signature)

(Nigar Ali)

Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. & Date Even.

Copy forwarded to the Librarian, Abbottabad Public Library, Abbottabad with direction to immediately obtain the said option from her and send the same to this office at your earliest as the delay is adversely affecting the promotion cases of other officials.

(Handwritten initials)

(Signature)

Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar

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091-9210100

Annex-13

ANNEXURE

DIRECTORATE OF ARCHIVES & LIBRARIES,
KHYBER PAKHTUNKHWA, PESHAWAR.

No. 1227 /3/52/DA Dated 13th June, 2013.

20

To,

Mrs. Nasim Sikandar, Junior Clerk,
Abbottabad Public Library, Allama Iqbal Road, Abbottabad.

Subject: -

OPTION REGARDING AVAILING PROMOTION AS SENIOR
CLERK (BPS-09)

A post of Senior Clerk (BPS-09) has fallen vacant in the Directorate of Archives & Libraries, Peshawar and according to the service rules you are eligible for promotion against the said post. You will be required to perform duties at Peshawar in case you want to avail the said promotion. You are therefore, directed to submit in writing that whether you want to avail or forego the said promotion. The option must be exercised within seven days of the receipt of this letter.

[Handwritten signature]

[Handwritten mark]

(Zahir Ullah Khan)
Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

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ANNEXURE
GOVERNMENT OF N.W.F.P.
DIRECTORATE OF ARCHIVES & LIBRARIES

Dated Peshawar the 10th November, 2007

OFFICE ORDER

No. 1456 /3/1/DA&L Consequent upon the re-instatement of Miss. Naseem Sikandar, Junior Clerk, (BS-5) at Abbottabad Public Library, Abbottabad by the honorable Peshawar High Court (Abbottabad Bench), Mr. Noor-ul-Basar, Junior Clerk (BS-5), Abbottabad Public Library, Abbottabad is hereby adjusted against the vacant post of Assistant (BS-11) on his own pay and scale at Abbottabad Public Library with effect from 1.11.2007 till further order.

(ZAHIR ULLAH KHAN)
Director of Archives & Libraries,
NWFP, Peshawar

Endst: No. & Date even

Copy forwarded for information and necessary action to :-

1. The District Account Officer, Abbottabad.
2. The Librarian, Abbottabad Public Library, Abbottabad.
3. Mr. Hafiz Noor-ul-Basar, Junior Clerk, Abbottabad Public Library, Abbottabad.
4. Office Order File

Director of Archives & Libraries,
NWFP, Peshawar

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ANNEXURE E

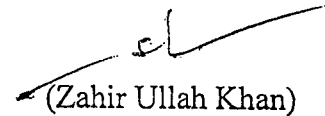
DIRECTORATE OF ARCHIVES & LIBRARIES,
KHYBER PAKHTUNKHWA, PESHAWAR

No. 2969 /3/1/DA Dated 11 October, 2018.

ORDER

Consequent upon the recommendations of Departmental Promotion/Selection Committee of the Directorate of Archives & Libraries, Khyber Pakhtunkhwa made in its meeting held on 04-10-2018, the competent authority is pleased to order the followings with immediate effect.

- (i) Appointment of Mrs. Nasim Sikandar, Senior Clerk (BPS-14), Maulana Muhammad Ishaq Library, Abbottabad to the position of Assistant (BPS-16) on acting charge basis against the existing vacancy in Maulana Muhammad Ishaq Library, Abbottabad, Directorate of Archives & Libraries, Khyber Pakhtunkhwa.
- (ii)- Appointment of Mr. Saleh Mahmood, Senior Clerk (BPS-14), Public Library, Bannu to the position of Assistant (BPS-16) on acting charge basis against the existing vacancy in Swabi Public Library, Swabi, Directorate of Archives & Libraries, Khyber Pakhtunkhwa.
- (iii)- Appointment of Mr. Khalid Usman, Senior Clerk (BPS-14), Rahman Baba Public Library Complex, Peshawar to the position of Assistant (BPS-16) on acting charge basis against the existing vacancy in Timergara Public Library, Dir Lower, Directorate of Archives & Libraries, Khyber Pakhtunkhwa.
- (iv)- Appointment of Mrs. Sajila, Senior Clerk (BPS-14), Directorate of Archives & Libraries, Peshawar to the position of Assistant (BPS-16) on acting charge basis against the existing vacancy in Rahman Baba Public Library Complex, Peshawar, Directorate of Archives & Libraries, Khyber Pakhtunkhwa.


(Zahir Ullah Khan)

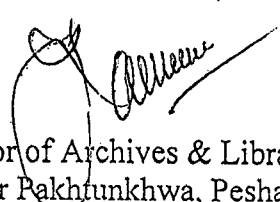
Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. & Date Even.

Copy forwarded to:

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Section Officer (C-IV.), Higher Education, Archives & Libraries Department, Khyber Pakhtunkhwa, Peshawar.
3. The District Accounts Officers at Abbottabad, Bannu, Swabi and Dir Lower.
4. Incharge Librarian, Bannu Public Library, Bannu.
5. Incharge Librarian, Swabi Public Library, Swabi.
6. Incharge Librarian, Timergara Public Library, Dir Lower.
7. Incharge Librarian, Rahman Baba Public library Complex, Hazar Khwani, Peshawar
8. Concerned Officials.
9. Personal Files of the concerned officials.
10. Officer Orders File.

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Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

10.	Naheed Ullah Khan, Assistant (BPS-16), Public Library, Bannu.	B. A	<u>10-04-1971</u> Bannu-IV	<u>10-08-1991</u> Naib Qasid (BS-01)	<u>10-08-1991</u> Naib Qasid (BS-01)	<u>10-04-2017</u> Assistant (BPS-16)	By promotion	
11.	Abdul Wassay, Assistant (BPS-16), DA&LS, Peshawar.	BA. Hons history	<u>10-04-1989</u> Karak-IV	<u>15-08-2017</u> Assistant (BPS-16)	<u>15-08-2017</u> Assistant (BPS-16)	<u>15-08-2017</u> Assistant (BPS-16)	By initial	
12.	Saima Kiran, Assistant (BS-16), DA&LS, Peshawar.	B. A	<u>13-01-1983</u> Bannu-IV	<u>09-10-2007</u> Jr. Clerk (BS-07)	<u>04-10-2007</u> Jr. Clerk (BS-07)	<u>15-05-2018</u> Assistant (BPS-16)	By Promotion.	
13.	Zafar Ullah, Assistant (BPS-16), DA&LS, Peshawar.	Bio-Tech (04-years)	<u>27-04-1988</u> Bannu-IV	<u>09-08-2018</u> Assistant (BPS-16)	<u>09-08-2018</u> Assistant (BPS-16)	<u>09-08-2018</u> Assistant (BPS-16)	By initial	
14.	Atif Aman, Assistant (BPS-16), Swat.	M.A (Political Science)	<u>01-02-1987</u> Swabi-II	<u>29-09-2020</u> Assistant (BPS-16)	<u>29-09-2020</u> Assistant (BPS-16)	<u>29-09-2020</u> Assistant (BPS-16)	By initial	Overall merit marks-174
15.	Ayesha Qureshi, Assistant (BPS-16), DA&LS, Peshawar.	MLIS	<u>02-03-1993</u> Abbottabad-V	<u>29-09-2020</u> Assistant (BPS-16)	<u>29-09-2020</u> Assistant (BPS-16)	<u>29-09-2020</u> Assistant (BPS-16)	By initial	Overall merit marks-151
16.	Maryam Sahibzada, Assistant (BPS-16), DA&LS, Peshawar.	Msc Zoology	<u>27-12-1991</u> Bannu-IV	<u>13-10-2020</u> Assistant (BPS-16)	<u>13-10-2020</u> Assistant (BPS-16)	<u>13-10-2020</u> Assistant (BPS-16)	By initial	Overall merit marks-147

Certified that the above seniority position is final and undisputed.

(Zahir Ullah Khan)
Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

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REVISED/ UPDATED COMBINED SENIORITY LIST OF HOLDERS OF THE POSTS OF ASSISTANT (BPS-16), RECORD ASSISTANT (BPS-16) AND SENIOR SCALE STENOGRAPHER (BS-16), DIRECTORATE OF ARCHIVES & LIBRARIES, KHYBER PAKHTUNKHWA AS IT STOOD ON 15-01-2021.

ANNEXURE D

S.#	Name of Officer	Qualification	Date of Birth with Domicile/Zone	Date of 1 st Entry into Govt: Service	Designation/ Date of 1 st appointment in the Office.	Date of regular promotion to the present post.	By Initial recruitment/ By Promotion.	Remarks.
1.	Sabir Ali, Assistant (BPS-16), Public Library, D.I Khan.	M.A	<u>15-04-1969</u> Peshawar-II	<u>07.04.1991</u> Junior Clerk (BPS-05)	<u>07.04.1991</u> Junior Clerk (BPS-05)	<u>18-10-2011</u> Assistant (BPS-14) <u>20-05-2014</u> Assistant (BPS-16)	By Promotion	-do-
2.	Mutabar Khan, Assistant (BPS-16), Public Library, Mardan.	FA	<u>16-04-1969</u> Mardan-II	<u>19-05-1991</u> Junior Clerk (BPS-05)	<u>19-05-1991</u> Junior Clerk (BS-05)	<u>16-01-2013</u> Assistant (BPS-14) <u>20-05-2014</u> Assistant (BPS-16)	By promotion.	-do-
3.	Josephine Sardar, Assistant (BPS-16), RBC, Peshawar.	F. A	<u>16-12-1968</u> Peshawar-II	<u>10-08-1991</u> Junior Clerk (BPS-05)	<u>10-08-1991</u> Junior Clerk (BPS-05)	<u>16-01-2013</u> Assistant (BPS-14) <u>20-05-2014</u> Assistant (BPS-16)	By promotion.	-do-
4.	Mohib Ullah, Assistant (BPS-16), DA&Ls, Peshawar.	B. A	<u>14-08-1969</u> Peshawar-II	<u>10-08-1991</u> Katib (BPS-05)	<u>10-08-1991</u> Katib (BPS-05)	<u>31-05-2013</u> Assistant (BPS-14) <u>20-05-2014</u> Assistant (BPS-16)	By promotion.	-do-
5.	Mukhtar Ahmad, Assistant (BPS-16) Public Library, Chitral.	M.A	<u>10-02-1990</u> Chitral-III	<u>30-05-2014</u> Assistant (BPS-16)	<u>30-05-2014</u> Assistant (BBPS-16)	<u>30-05-2014</u> Assistant (BPS-16)	By Initial	-
6.	Sharbat Ali, Record Assistant (BPS-16) DA&Ls, Peshawar.	F. A	<u>02-01-1967</u> Peshawar-II	<u>01-04-1992</u> Junior Clerk (BPS-05)	<u>01-04-1992</u> Junior Clerk (BPS-05)	<u>25-02-2015</u> Record Assistant (BPS-16)	By Promotion	-
7.	Muhammad Arshad, Assistant (BPS-16), Public Library, Haripur.	SSC	<u>21-06-1972</u> Haripur-V	<u>10-08-1991</u> Naib Qasid (BPS-01)	<u>10-08-1991</u> N. Qasid (BPS-01)	<u>25-02-2015</u> Assistant (BPS-16)	By Promotion	
8.	Muhammad Ishaq, Sr. Scale Stenographer BS-16, Peshawar.	M.A	<u>02-02-1964</u> Mardan-II	<u>01-04-1987</u> BPS-12	<u>01-04-1987</u> BPS-12	<u>18-03-2016</u> Senior Scale Stenographer (BPS-16)	By Promotion	
9.	Muhammad Yousaf, Assistant BS-16, Public Library, Charsadda.	SSC	<u>03-04-1972</u> Mardan-II	<u>14-11-1990</u> Naib Qasid (BS-01)	<u>14-11-1990</u> Naib Qasid (BS-01)	<u>10-04-2017</u> Assistant (BS-16)	By promotion	

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ANNEXURE D

DIRECTORATE OF ARCHIVES & LIBRARIES,
KHYBER PAKHTUNKHWA, PESHAWAR.

NO. 91 /3/52/DA Dated 13 /01/ 2021.

(15)

To,

All concerned, Directorate of Archives & Libraries,
Khyber Pakhtunkhwa.

Subject:

REVISED/UPDATED COMBINED SENIORITY LIST OF HOLDERS OF
THE POSTS OF ASSISTANT (BPS-16), RECORD ASSISTANT(BPS-16)
AND SENIOR SCALE STENOGRAPHER (BS-16) IN DIRECTORATE OF
ARCHIVES & LIBRARIES, KHYBER PAKHTUNKHWA AS IT STOOD
ON 15-01-2021.

Enclosed please find herewith the above referred list for your information and signature. If you have any objection/reservation regarding your seniority position contained in the list, the same along with relevant record may be forwarded to this office in writing by 29-01-2021 for rectification, otherwise, the list will be considered undisputed and will accordingly be notified.

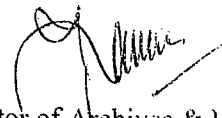
(Zahir Ullah Khan)

Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar

Endst: No. & Date Even.

Copy of the above referred seniority list is forwarded to: -

- 01- The Incharges, Public Libraries at Peshawar, Nowshera, Mardan, Swabi, Swat, Dir Lower, Chitral, DI Khan, Lakki Marwat, Bannu, Kohat, Haripur and Abbottabad with direction to circulate the list amongst all concerned for their information.
- 02- For Circulation amongst concerned staff of Directorate of Archives & Libraries, Peshawar.



Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar

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