

Form- A

FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 1466 /2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/10/2022	<p>The appeal of Mr. Muhammad Ishaq presented today by Mr. Safdar Iqbal Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on . Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p>REGISTRAR</p>

# KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

## CHECK LIST

Muhammad Ishtiaq **Versus**

Govt. of KP

..... Appellant

..... Respondents

S NO	CONTENTS	YES	NO
1.	This petition has been presented by: <u>Safdar Ullah</u> Advocate <u>High Court</u> Pesh	√	
2.	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	√	✓
3.	Whether appeal is within time?	√	
4.	Whether the enactment under which the appeal is filed mentioned?	√	
5.	Whether the enactment under which the appeal is filed is correct?	√	
6.	Whether affidavit is appended?	√	
7.	Whether affidavit is duly attested by competent Oath Commissioner?	√	
8.	Whether appeal/annexures are properly paged?	√	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	√	
10.	Whether annexures are legible?	√	
11.	Whether annexures are attested?	√	
12.	Whether copies of annexures are readable/clear?	√	
13.	Whether copy of appeal is delivered to AG/DAG?	√	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	√	
15.	Whether numbers of referred cases given are correct?	√	
16.	Whether appeal contains cutting/overwriting?	x	
17.	Whether list of books has been provided at the end of the appeal?	√	
18.	Whether case relate to this court?	√	
19.	Whether requisite number of spare copies attached?	√	
20.	Whether complete spare copy is filed in separate file cover?	√	
21.	Whether addresses of parties given are complete?	√	
22.	Whether index filed?	√	
23.	Whether index is correct?	√	
24.	Whether Security and Process Fee deposited? On _____		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974, Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	√	
26.	Whether copies of comments/reply/rejoinder submitted? On _____		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? On _____		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:- Safdar Ullah

Signature:- [Signature]

Dated:- 11/10/2022

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Appeal No. 1466 /2022

Muhammad Ishaq ..... **Appellant**

**VERSUS**

Chief Conservator Officer of Forest Department & others

..... **Respondents**

**I N D E X**

S NO	DESCRIPTION OF DOCUMENTS	ANNEX	PAGES
1.	Service Appeal	-	1-4
2.	Affidavit	-	5
3.	Suspension Application		6-7
4.	Affidavit		8
5.	<b>Copy of Appointment Order</b>	<b>A</b>	9-
6.	<b>Copy of order dated 16.06.2022</b>	<b>B</b>	10-12 .
7.	<b>Copy of office Order</b>	<b>C</b>	13-14
8.	<b>Copy of Departmental Appeal</b>	<b>D</b>	15-
9.	<b>Copy of legal notice</b>	<b>E</b>	16-18
10.	<b>Wakalat Nama</b>		19 .

Dated: 11.10.2022

Through

*Ishaq*  
Appellant

*Safdar*  
**SAFDAR IQBAL KHATTAK**  
Advocate, High Court  
Peshawar

*11/10/2022*

①

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

Appeal No. 1466 /2022

Muhammad Ishaq, presently serving as Forest Guard BPS-8, in  
Peshawar Sub-Division..... **Appellant**

**VERSUS**

1. Chief Conservator Officer of Forest Department Region-I,  
Shami Road Peshawar.
2. Conservator of Forest Southern District Shami Road,  
Peshawar.
3. Divisional Forest Officer, Peshawar.

..... **Respondents**

**APPEAL AGAINST THE SELECTION**  
**PROCESS / WORKING PAPER PREPARED**  
**BY THE DEPARTMENTAL PROMOTION**  
**COMMITTEE, WHEREBY THEY**  
**DECLARED THE APPELLANT IS NOT**  
**ELIGIBLE FOR PROMOTION AND THEY**  
**ARE INTENDED TO PROMOTE JUNIOR**  
**THEN THE APPELLANT.**

Respectfully Sheweth:

1. That the Appellant was appointed on 15.12.1984 as Forest Guard in the respondents No 1 to 3 Department. **(Copy of Appointment Order is attached as annexure A)**
2. That on 16.06.2022, the respondent No 3 issued a order dated 16.06.2022 wherein he constituted a Committee for Promotion. **(Copy of order dated 16.06.2022 is attached as annexure B)**
3. That the above promotion Committee prepared working papers for promotion, wherein the name of Appellant was declared as not eligible for promotion. **(Copy of office Order attached as annexure C)**
4. That against the above order the appellant along with other submitted a departmental appeal before the Respondent No 3. **(Copy of Departmental Appeal is attached as annexure D)**
5. That the above Departmental Appeal was not responded by the respondent No 3 within the stipulated period.
6. That after the appellant along with other send a legal notice to the respondent No 3. **(Copy of legal notice is attached as annexure D)**
7. That the Appellant is aggrieved from the impugned action dated 16.06.2022, whereby the Respondent No 3 prepared

working papers wherein the Appellant is declared as "Not Eligible" for promotion, hence the instant Appeal to come before this Hon'ble Tribunal from the following amongst other grounds:

### **GROUND:**

- A. That the act of the respondent No 1 to 3, regarding the declaration of the Appellant being not eligible for promotion is totally illegal, unlawful and as against the fundamental right guaranteed by the constitution of Pakistan 1973.
- B. That the Appellant is most Senior in the respondents Department, thus the act of respondent No 1 to 3 to promote Juniors is the utter violation of law and rules.
- C. That it is pertinent to mention here that earlier also a DPC was constituted. But the same was postpone, till the completion of some Senior Officials who were undertraining.
- D. That 12 Nos of posts of Forester are still lying vacant, which should be filled as per law i.e seniority cum-fitness.
- E. That the respondent No 3, send the Appellant along with others for training with a hope that after completion of

(4)

his training, he will be promoted from Forest Guard to Forester in the meanwhile the respondent No 3 with due malafide intention started working papers for promotion just to adjust their own blue eyed persons / Junior persons then the Appellants.

F. That any additional grounds will be raised at the time of arguments.

It is, therefore, humbly prayed that by acceptance of the instant Appeal, the impugned action of the respondents regarding promotion of Junior from BPS-8 to 10 as Forest Guard to Forester may kindly be declared as illegal, unlawful void ab initio, this ineffective upon the rights of the Appellant.

Dated: 11.10.2022

Through

Appellant

  
**SAFDAR IQBAL KHATTAK**  
Advocate, High Court  
Peshawar

**CERTIFICATE:**

It is certified that no such like Service Appeal has earlier been filed before this Hon'ble Tribunal.

  
**DEPONENT**

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**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Appeal No. \_\_\_\_\_/2022

Muhammad Ishaq ..... **Appellant**

**VERSUS**

Chief Conservator Officer of Forest Department & others

..... **Respondents**

**AFFIDAVIT**

I, Muhammad Ishaq, presently serving as Forest Guard BPS-8, in Peshawar Sub-Division, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

*Muhammad Ishaq*

**DEPONENT**

**ATTESTED**  
\* Advocate General  
\* Peshawar





(1)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

CM No. \_\_\_\_\_/2022

In

Appeal No. \_\_\_\_\_/2022

Muhammad Ishaq ..... **Appellant**

**VERSUS**

Chief Conservator Officer of Forest Department & others

..... **Respondents**

**APPLICATION FOR SUSPENSION OF  
IMPUGNED ACTION DATED 11.06.2022  
PASSED BY THE RESPONDENTS, WHEREBY  
THEY PROMOTED JUNIOR OFFICIALS FROM  
THE SENIOR OFFICIALS, TILL THE FINAL  
DECISION OF THE SERVICE APPEAL.**

**Respectfully Sheweth:**

1. That the above noted Service Appeal is being filed before this hon'ble Tribunal, in which no date of hearing has yet been fixed.
2. That the Appellant has got a good prima facie case in his favour, and are sanguine about its success.

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3. That the balance of convenience also lies in favour of the Appellant.
4. That if the Impugned action dated 11.06.2022 is not suspended, the Appellant would suffer extreme irreparable loss.
5. That the facts and grounds of the Service Appeal may kindly be read as an integral part of this application.

**It is, therefore, respectfully prayed that on acceptance of this application, the Impugned Action dated 11.06.2022 of the Respondents may kindly be suspended, till the final decision of the case.**

Dated: 11.10.2022

Through

Appellant

  
**SAFDAR IQBAL KHATTAK**  
Advocate, High Court  
Peshawar

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**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

CM No. \_\_\_\_/2022

In

Appeal No. \_\_\_\_/2022

Muhammad Ishaq ..... **Appellant**

**VERSUS**

Chief Conservator Officer of Forest Department & others

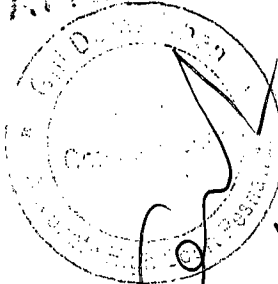
..... **Respondents**

**AFFIDAVIT**

I, Muhammad Ishaq, presently serving as Forest Guard BPS-8, in Peshawar Sub-Division, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

*Muhammad Ishaq*  
**DEPONENT**

**ATTESTED**



*10/11/22*

OFFICE ORDER NO. 103 (4) DATED NOWSHERA, THE  
16/06/2022, ISSUED BY MR. TARIQ KHADIM, DIVISIONAL FOREST  
OFFICER, PESHAWAR FOREST DIVISION AT NOWSHERA.

A Departmental Promotion Committee consisting of the following officers  
has been constituted for the selection of suitable candidates amongst the holders of  
the post of Forest Guards (BPS-08), for promotion to the rank of Foresters (BPS-10),  
in the vacant posts in Peshawar Forest Division, Nowshera:-

1. Divisional Forest Officer,  
Peshawar Forest Division, Nowshera = Chairman
2. Section Officer (Estt:)  
Forestry, Environment and Wildlife Department  
Govt. of Khyber Pakhtunkhwa = Member
3. Representative of Conservator of Forests,  
Southern Circle Peshawar = Member
4. Sub-Divisional Forest Officer,  
Peshawar Forest Sub-Division = Member

Sd/-

(Tariq Khadim)  
Divisional Forest Officer  
Peshawar Forest Division  
Nowshera

NO. SSOD-02/E

Copy forwarded to:-

1. Conservator of Forests, Southern Circle Peshawar for favour of  
information, please.
2. Section Officer (Estt:), Forestry, Environment and Wildlife Department  
Govt. of Khyber Pakhtunkhwa, Peshawar. He is requested to intimate  
the date convenient to him enabling this office to held meeting for the  
purpose.
3. Sub-Divisional Forest Officer, Peshawar Forest Sub-Division, Peshawar  
for information and further necessary action in the matter.

Divisional Forest Officer  
Peshawar Forest Division  
Nowshera

ATTESTED  
g.h.

LETTERS OF THE  
10/06/2022  
for letter No. letter No.  
of this office  
the subject noted above

WORKING PAPER.

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PROMOTION OF FOREST GUARDS (BPS-08) TO THE RANK OF FORESTERS (BPS-10) OF PESHAWAR FOREST DIVISION NOWSHERA.

1. As is evident from the budget book for the current Financial year 2022-23 (**Annexure-I**), there are total 48 sanctioned posts of Forester (BPS-10) in Peshawar Forest Division against which 38 posts (including 02 Foresters promoted as Deputy Ranger on ACB) are presently filled (**Annexure-II**) whereas 10 posts (excluding two posts of Forester promoted as Deputy Ranger on ACB) are lying vacant at the moment for regular promotion whereas two posts will also be filled by promotion on ACB till regular promotion of M/S Fazal Badshah and Arshad Khan Foresters already promoted as Deputy Ranger on ACB, the detail of vacant posts is as under:-

Sanctioned posts	Available on roll	Differences	Total vacancies
48 Nos.	38 Nos. (including 02 Foresters promoted as Deputy Ranger on ACB)	48-38=10 02 posts goes to ACB <b>Total=12</b>	1. For regular promotion = 10 2. For promotion on acting charge basis= 02 <b>Total: = 12</b>

2. According to the approved Service Rules presently in vogue in the Khyber Pakhtunkhwa Forest Department as Notified vide No. SO(Estt)FF&WD/1-465/2021 dated 4<sup>th</sup> June, 2021 (**Annex-III**) the method for the filling of the vacant posts of Foresters (BPS-10) is as under:-

"100 % by promotion on the basis of seniority-cum-fitness amongst the holders of the post of Forest Guards of the Forest Division where the vacancies occurred, who have at least five years service as such and have passed such departmental examination as may be prescribed by Govt. for the purpose"

NOTE:-

3. Out of total 12 vacant posts of Foresters, 03 SNE posts have recently been sanctioned vide **Annexure-IV**, whereas the other 09 Nos. of Posts have been vacated due to retirement of the following officials/Foresters :-

- 1) Promotion of Mr. Arshad Khan Forester to the rank of Deputy Ranger with effect from 11.08.2021 on acting charge basis. (**Annexure-V**)
- 2) Promotion of Mr. Fazal Badshah Forester to the rank of Deputy Ranger with effect from 11.08.2021 on acting charge basis. (**Annexure-VI**)
- 3) Retirement of Mr. Saif Ur Rehman Forester with effect from 22.02.2022. (**Annexure-VII**)
- 4) Retirement of Mr. Jan e Alam Forester with effect from 26.01.2022. (**Annexure-VIII**)
- 5) Retirement of Mr. Nasir Khan Forester with effect from 01.04.2022. (**Annexure-IX**)
- 6) Retirement of Mr. Taj Mian Gul Forester with effect from 13.04.2022. (**Annexure-X**)
- 7) Retirement of Muhammad Younus Forester with effect from 13.04.2022. (**Annexure-XI**)
- 8) Retirement of Mr. Misal Khan Forester with effect from 09.05.2022. (**Annexure-XII**).

9/2/22

17/02/2022

(11)

According to the Seniority list of Forest Guard (Annexure-XIV), a panel of 36 senior most Forest Guards who have already completed their five years service in the cadre of Forest Guards is furnished as under:-

Slr	Name of Forest Guard	Date of		Whether completed 5 years service	Whether Train/Un-train	Whether eligible for promotion
		Birth	Present appointment as Forest Guard			
1	Mamoor Gul	01.05.1964	13.11.1982	Yes	Un-trained	Not eligible being untrained
2	Noor Gul	06.02.1964	13.11.1982	Yes	Un-trained	Not eligible being untrained
3	Muhammad Ishaq	09.11.1966	15.12.1984	Yes	Un-trained	Not eligible being untrained (presently under training)
4	Fazal-e-Raziq	21.03.1964	09.09.1985	Yes	Un-trained	Not eligible being untrained
5	Mukhtiar Ali	19.09.1966	18.12.1988	Yes	Un-trained	Not eligible being untrained (presently under training)
6	Ijaz Khan	01.01.1970	30.12.1990	Yes	Un-trained	Not eligible being untrained (presently under training)
7	Safid Khan	01.09.1968	14.04.1993	Yes	Un-trained	Not eligible being untrained
8	Rasheed Iqbal	03.03.1969	07.10.2005	Yes	Un-trained	Not eligible being untrained (presently under training)
9	Daud Jan	28.09.1969	24.02.1990	Yes	Un-trained	Not eligible being untrained (presently under training)
10	Shamsher Khan	12.04.1975	01.05.1995	Yes	Un-trained	Not eligible being untrained (presently under training)
11	Shah Muhammad	10.01.1971	16.05.1995	Yes	Un-trained	Not eligible being untrained
12	Naveed Iqbal	28.02.1987	12.07.2011	Yes	Un-trained	Not eligible being untrained (presently under training)
13	Aamir Shahzad	20.02.1991	27.07.2009	Yes	Trained	Already promoted on acting charge basis vide DFO Peshawar Office Order No. 78 dated 03/03/2022 are now eligible for promotion on regular basis.
14	Asad Khan	05.05.1983	29.07.2009	Yes	Trained	
15	Muhammad Shafiullah Khan	15.02.1988	29.07.2009	Yes	Trained	Eligible/Fit for promotion
16	Said-ul-Ibrar	30.04.1989	29.07.2009	Yes	Trained	Eligible/Fit for promotion
17	Saitullah Khan	04.09.1989	29.07.2009	Yes	Un-trained	Un-trained Not eligible
18	Oasim Ali	21.10.1989	29.07.2009	Yes	Trained	Eligible/Fit for promotion
19	Sardar Ali	10.07.1990	29.07.2009	Yes	Trained	Eligible/Fit for promotion
20	Asfandiyar	20.01.1985	30.07.2009	Yes	Trained	Eligible/Fit for promotion

**ATTESTED**

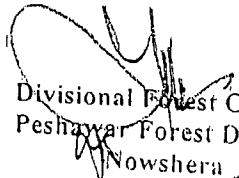
*(Signature)*

(12)

24	Afzal Khan	03.03.1989	04.05.2010	Yes	Trained	Eligible/Fit for promotion
25	Saeed Khan	06.06.1979	23.11.2010	Yes	Un-trained	Not eligible being untrained (presently under training)
26	Noman Ahmad	31.03.1991	07.12.2011	Yes	Trained	Eligible/Fit for promotion
27	Ibrar Ullah	03.02.1986	22.12.2011	Yes	Trained	Eligible/Fit for promotion
28	Ibrar Ali Khan	05.02.1988	06.06.2012	Yes	Trained	Eligible/Fit for promotion
29	Shahab Ahmad	15.01.1987	11.06.2012	Yes	Trained	Eligible/Fit for promotion
30	Muhammad Yahya	21.05.1973	05.03.2013	Yes	Trained	Eligible/Fit for promotion
31	Abbas Khan	18.04.1977	08.01.2014	Yes	Trained	Eligible/Fit for promotion
32	Wadood Jan	01.04.1975	30.05.2014	Yes	Trained	Eligible/Fit for promotion
33	Wajid Gul	02.08.1975	15.01.2015	Yes	Trained	Eligible/Fit for promotion
34	Eisa Tahir Khan	05.01.1998	10.08.2018	No	Un-trained	Not eligible being untrained as well as having less than five year service
35	Muhammad Ishfaq	15.01.1989	15.08.2018	No	Un-trained	Not eligible being untrained as well as having less than five year service
36	Inam Ullah	15.02.1990	15.08.2018	No	Trained	Not Eligible/Fit for promotion due to less than five years service in the cadre of Forest Guard.

5. It is certified that the officials mentioned in the panel:-
- Hold the Forest Guard Post on regular basis and not on Adhoc basis.
  - Have completed the qualifying service of five years as Forest Guard. (Except the Forest Guards at S.No 34 to 36).
  - No departmental/disciplinary /judicial proceedings are pending against them.
  - Neither NAB cases are pending nor involved in plea bargaining.
  - Synopsis of ACRs of the Forest Guards and no disciplinary/anti-corruption cases certificates are placed as (Annexure-XV and XVI).

The DPC is therefore, requested to determine suitability of Forest Guards for promotion to the rank of Foresters (BPS-10) against the 10 vacant posts on regular basis and 02 post on acting charge basis.

  
 Divisional Forest Officer  
 Peshawar Forest Division  
 Nowshera

**ATTESTED**  


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FINAL SENIORITY LIST OF FOREST GUARDS OF PESHAWAR FOREST DIVISION, NOWSHERA, AS IT STOOD ON 13/11/2022

No	Name of Forest Guard	Domicile	Qualification	Date of Birth	Date of entry in to Govt. Service	Date of appointment in present Grade	Trained/Untrained
1	Mamoor Gul	Nowshera	U-Matric	01.05.1964	13.11.1982	13.11.1982	Untrained
2	Near Gul	Peshawar	Middle	06.02.1964	13.11.1982	13.11.1982	Untrained
3	Muhammad Ishaq	Nowshera	Matric	09.11.1966	15.12.1984	15.12.1984	Untrained
4	Fazal-e-Raziq	Nowshera	Matric	21.03.1964	09.09.1985	09.09.1985	Untrained
5	Mukhtiar Ali	Nowshera	B.A	15.09.1966	21.12.1988	18.12.1988	Un-trained
6	Ijaz Khan	Charsadda	Matric	01.01.1970	30.12.1990	30.12.1990	Untrained
7	Sajid Khan	Charsadda	Matric	01.09.1968	14.04.1993	17.04.1993	Untrained
8	Rasheed Iqbal	Karak	B.A	03.03.1969	10.10.1994	10.10.1994	Untrained
9	Daud Jan	Nowshera	Matric	28.09.1969	18.12.1994	18.12.1994	Untrained
10	Shamsher Khan	Peshawar	Matric	12.04.1975	01.05.1995	01.05.1995	Untrained
11	Shah Muhammad	Peshawar	Matric	10.01.1971	16.05.1995	16.05.1995	Untrained
12	Naveed Iqbal	Peshawar	Matric	28.02.1987	27.03.2009	27.03.2009	Untrained
13	Amir Shahzad	Peshawar	F.Sc	20.02.1991	27.07.2009	27.07.2009	Untrained
14	Asad Khan	Peshawar	Matric	05.05.1983	29.07.2009	29.07.2009	Trained
15	Muhammad Shafiqullah Khan	Peshawar	Matric	15.02.1988	29.07.2009	29.07.2009	Trained
16	Said-ul-Ibrar	Charsadda	BA	30.04.1989	29.07.2009	29.07.2009	Un-Trained
17	Saifullah Khan	Charsadda	Matric	04.09.1989	29.07.2009	29.07.2009	Trained
18	Qasim Ali	Peshawar	Matric	21.10.1989	29.07.2009	29.07.2009	Trained
19	Sardar Ali	Peshawar	Matric	10.07.1990	29.07.2009	30.07.2009	Trained
20	Asfandiyar	Charsadda	Matric	20.01.1985	30.07.2009	30.07.2009	Trained
21	Basit Khan	Peshawar	Matric	03.04.1988	01.08.2009	01.08.2009	Trained
22	Sajjad Ali Khan	Nowshera	Matric	10.02.1984	04.08.2009	04.08.2009	Trained
23	Amin-ur-Raseool	Buner	MA	01.07.1972	02.01.1995	01.12.2009	Trained (originally appointed in Buner Watershed Forest Division & adjusted in District Govt. Peshawar w.e.f 01.12.2009.)
24	Afzal Khan	Nowshera	F.A	03.03.1989	04.05.2010	04.05.2010	Trained
25	Saeed Khan	Peshawar	Matric	06.06.1979	08.04.2006	23.11.2010	Un-trained
26	Noman Ahmad	Nowshera	Matric	31.03.1991	07.12.2011	07.12.2011	Trained
27	Ibrar Ullah	Charsadda	F.Sc	03.02.1986	22.12.2011	22.12.2011	Trained
28	Ibrar Ali Khan	Peshawar	F.A	05.02.1988	06.06.2012	06.06.2012	Trained
29	Shahab Ahmad	Nowshera	F.Sc	15.01.1987	11.06.2012	11.06.2012	Trained
30	Muhammad Yahya	Charsadda	B.Sc	21.05.1973	05.03.2013	05.03.2013	Trained
31	Abbas Khan	Charsadda	BA	18.04.1977	08.01.2014	08.01.2014	Trained
32	Wadood Jan	Charsadda	Matric	01.04.1975	30.05.2014	30.05.2014	Trained
33	Wajid Gul	Charsadda	FA	02.08.1975	26.03.2009	15.01.2015	(Trained) The Forest Guard was appointed in Southern Circle Peshawar vide CF Southern Circle office order No. 39-dated 24.03.2009 and served there from 26.03.2009 to 14.01.2015. Subsequently he has been transferred to Peshawar Forest Division vide CF Southern Circle order No. 25 dated 13.01.2015 and the official reported arrival for duty in this Division on 15.01.2015, therefore, he has been placed at the bottom of the seniority list of Forest Guards of this Division w.e.f the date accordance with

Already promoted on acting charge basis vide DFO Peshawar Office Order No. 78 dated 03/03/2022 and are now eligible for promotion on regular basis.

ATTESTED  
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							his reporting of his arrival for duty i.e 15.01.2015.
34	Eisa Tabir Khan	Charsadda	F.A	05.01.1998	10.08.2018	10.08.2018	Un-trained
35	Muhammad Ishfaq	Nowshera	Master	15.01.1989	15.08.2018	15.08.2018	Un-trained
36	Iram Ullah	Nowshera	Master	15.02.1990	15.08.2018	15.08.2018	Trained
37	Noman Khan	Nowshera	Master	19.10.1990	15.08.2018	15.08.2018	Un-trained
38	Muhammad Shoab	Peshawar	Master	27.02.1991	15.08.2018	15.08.2018	Un-trained
39	Muhammad Ayaz	Nowshera	B.Sc Hons	10.04.1989	15.08.2018	15.08.2018	Un-trained
40	Adil Suleman	Nowshera	Bachelor	15.08.1991	15.08.2018	15.08.2018	Un-trained
41	Muhammad Islam	Charsadda	Bachelor	16.03.1992	15.08.2018	15.08.2018	Un-trained
42	Zarak Khan	Nowshera	Bachelor	28.03.1992	15.08.2018	15.08.2018	Un-trained
43	Asghar Niaz	Peshawar	Bachelor	24.10.1993	15.08.2018	15.08.2018	Un-trained
44	Adil Shah	Nowshera	Bachelor	06.11.1994	15.08.2018	15.08.2018	Trained
45	Sana Ullah	Nowshera	Bachelor	10.03.1995	15.08.2018	15.08.2018	Un-trained
46	Muhammad Izaz	Charsadda	Bachelor	05.04.1995	15.08.2018	15.08.2018	Un-trained
47	Zeeshan Qaiser	Nowshera	Bachelor	02.07.1995	15.08.2018	15.08.2018	Un-trained
48	Nasir Khan	Nowshera	Bachelor	07.02.1997	15.08.2018	15.08.2018	Un-trained
49	Zubair Khan	Nowshera	Master	11.01.1990	17.08.2018	17.08.2018	Un-trained
50	Muhammad Numan	Charsadda	Master	31.12.1995	18.08.2018	18.08.2018	Un-trained
51	Sahib Zada Safi Ullah	Peshawar	Bachelor	31.12.1996	07.09.2018	07.09.2018	Un-trained
52	Afaaz Ahmad	Nowshera	Bachelor	06.03.1993	13.09.2018	13.09.2018	Un-trained
53	Iftikhar Khan	Nowshera	DAE	25.11.1995	13.09.2018	13.09.2018	Un-trained
54	Wisal Khan	Nowshera	F.Sc	15.10.1996	13.09.2018	13.09.2018	Un-trained
55	Muhammad Fayaz	Nowshera	DAE	27.03.1993	13.09.2018	13.09.2018	Un-trained
56	Mehran Khan	Nowshera	Bachelor	05.09.1994	28.09.2018	28.09.2018	Un-trained
57	Hashmat Ali (12)	Charsadda	Bachelor	20.03.1979	01.07.2002	05.11.2019	The Forest Guard was appointed in FATA-I Forest Division and was serving there from 22.03.2001 to 01.11.2019 subsequently he has been transferred to Peshawar Forest Division vide CCF-I office order No. 74 dated 1.11.2019 and he has reported arrival for duty in this Division on 05.11.2019, therefore, he has been placed at the seniority list of this Division in accordance with his duty of reporting arrival for duty i.e 05.11.2019.
58	Muhammad Abbas Khan	Nowshera	F.Sc	06.03.2001	28.08.2020	28.08.2020	Un-trained
59	Tanveer Ahmad	Charsadda	Bachelor	15.03.1986	24.12.2020	24.12.2020	Un-trained
60	Asfandiyar Rehman	Nowshera	F.SC	16.09.1999	04.03.2021	04.03.2021	Un-trained
61	Nizakat Ali Shah	Nowshera	Master	01.04.1990	05.07.2021	05.07.2021	Un-trained
62	Yasir Rehman	Charsadda	F.SC	06.05.1992	06.10.2011	03.01.2022	(Un-trained) The Forest Guard was appointed in Khyber Forest Division, Peshawar-wide office order No. 06 dated 30.09.2011 and served there from 06.10.2011 to 31.12.2021. Subsequently he has been transferred to Peshawar Forest Division vide CCF-I Peshawar order No. 82 dated 13.12.2021 and the official reported arrival for duty in this Division on 03.01.2022 (F.N), therefore, he has been placed at the bottom of the seniority list of Forest Guards of this Division w.e.f the date reporting arrival for duty i.e 03.01.2022.

ATTESTED

gbar

Attested

Divisional Forest Officer  
Peshawar Forest Division  
Attested

حضرت جناب ڈوٹریٹری نارسٹ انہر صاحب لہنا اور نارسٹ ڈوٹریٹری لہنا

لہنا سب ڈوٹریٹری نارسٹ انہر لہنا اور

درخواست لہنا پر درجوش دینے کی منظوری

جناب عالی! گذرشن ہے کہ سائل حسب ذیل سرمن ہے۔

یہ کہ سائلن کی آفتیاں نارسٹ مارچ پوسٹوں پر پورٹی ہے

یہ کہ سائلن عمر ۴۴ دراز سے انہی پوسٹوں پر سہ کاری ڈیوٹیاں سرانجام دہ

رہے ہے۔ یہ کہ انہی سائلن کو باجنہر دراز سے معلوم ہویہ کہ نارسٹ گارڈ پوسٹ ہے

سہ نارسٹری پوسٹ پر سنیارٹی لہنا کی بنیاد پر درجوش پورٹی ہے۔ یہ کہ سائلن

مینیارٹی لہنا کی بنیاد پر سنیارٹی بند ہے۔ یہ کہ خالی میں سائلن کا نرہنت

لہنا کا اڈر بھی ہو چکا ہے۔ اور سائلن نے پراپر طریقے سے لہنا بھی پاس کر چکا ہے

اور ہم لہنا سے باقاعدہ ملاسی بھی شروع ہونے دلتے ہیں۔

اسلئے جناب عالی خدمت سرمن کیجائی ہے کہ ہم سائلن کی مینیارٹی

پس عمر ۴۴ دراز تک پر درجوش نہ ہونا اور ریٹائرمنٹ (۶۵ سال) کے قریب ہونے کی خاطر

ہم سائلن کو پر درجوش دینے کی منظوری دی جائے۔ ہم سائلن بینٹ شکر گزار ہونگے

مرام 30/5/2022

بیماری دعائیں آپکے ساتھ رہے گئے

Zain Ali Shah  
Received  
20/06/2022

ATTESTED

محمد اسماعیل نارسٹ گارڈ (۱) دادو جان  
(۲) مختیار علی  
(۳) اعجاز خان  
(۴) شہید خان

درخواست لہنا کی دہنا  
درخواست لہنا کی دہنا

# Zahoor Islam Khattak

Advocate High Court,  
Peshawar.

Off: FR-20, 4<sup>th</sup> Floor  
Bilour Plaza, Peshawar.  
Mobile # 0346-9083579

1/5

Ref: 0789

Date \_\_\_\_\_

## LEGAL NOTICE

To,

Divisional Forest Officer, Peshawar,  
Forest Division, Nowshera.

From:

1. Muhammad Ishaq
2. Mukhtiar Ali
3. Daud Jan
4. Muhammad Ijaz
5. Rasheed Iqbal
6. Shamsheer Khan
7. Saeed Khan
8. Naveed Iqbal
9. Saif Ullah
10. Hashmat Ai, All Forest Guards, Peshawar Forest Division, Peshawar.

Subject:

### LEGAL NOTICE:

It is to inform you that I am engaged by my clients mentioned above to serve upon you this legal notice due to following reason:

1. That my clients were appointed as Forest Guard (F.G) in Forest Department having different dates of appointment.

ATTESTED  
[Signature]

# Zahoor Islam Khattak

Advocate High Court,  
Peshawar.

Off: FR-20, 4<sup>th</sup> Floor  
Bilour Plaza, Peshawar.  
Mobile # 0346-9083579

17

Ref: 0789

Date \_\_\_\_\_

2. That my clients have performed their duties with utmost zeal and enthusiasm and no complaint whatsoever was ever made against them to the high-up's.
3. That it is pertinent to mention here that my clients are senior most in Forest Department and they have qualified test and they are on training for promotion for one year in Abbottabad.
4. That my clients came to know from reliable sources that your honour are going to promoted the junior most Forest Guard and ignore my clients who are at verge of retirement.
5. That my clients are at the stage of superannuation and to deprive them from promotion will discriminate them and they will suffer irreparable loss.

It is, inform to you through this legal notice that consider my clients for promotion after service of this legal notice upon you.

**ATTESTED**

*[Signature]*

# Zahoor Islam Khattak

Advocate High Court,  
Peshawar.

Off: FR-20, 4<sup>th</sup> Floor  
Bilour Plaza, Peshawar.  
Mobile # 0346-9083579

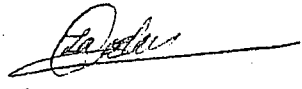
Ref: 0789

Date \_\_\_\_\_

within 15 days otherwise may client have statutory right of appeal against you and your department.

- Clients
1. Muhammad Ishaq
  2. Mukhtiar Ali
  3. Daud Jan
  4. Muhammad Ijaz
  5. Rasheed Iqbal
  6. Shamsheer Khan
  7. Saeed Khan
  8. Naveed Iqbal
  9. Saif Ullah
  10. Hashmat Ali

Through




  
**Zahoor Islam Khattak**  
Advocate High Court,  
Peshawar.

**Note:**

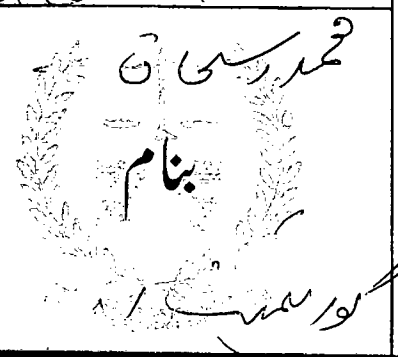
A copy of this legal notice is retaining in my office for further necessary legal action against you and your department.

  
**ADVOCATE**

**ATTESTED**  


50	ایڈویٹ: <u>محمد اقبال حسین امروہی</u>			
	بار کونسل ایسوسی ایشن نمبر: <u>be-10-2969</u>	پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
	رابطہ نمبر: <u>0800 5980549</u>			

بعدالت جناب: سروسز کمپیوٹرز پرائیویٹ لمیٹڈ

منجانب: <u>Appellant</u>	دعویٰ:
 <b>بنام</b> <u>گورنمنٹ</u>	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

**باعت تحریر آگے**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ  
 آن مقام کیلئے محمد اقبال حسین کو وکیل مقرر  
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو  
 راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق  
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز  
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب  
 مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا  
 دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے  
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المقام: 11 اکتوبر 2024

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

محمد اقبال حسین  
 Appellant Muhammad