

20th Sept 2022 Learned counsel for the appellant present.

Learned counsel for the appellant seeks some time to prepare the case. To come up for preliminary hearing on 15.11.2022 before S.B at camp court Abbottabad.





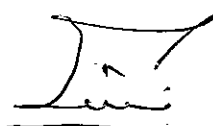
(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 910/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/06/2022	<p>The appeal of Mr. Abdul Razzaq resubmitted today by Sardar Aamir Qadar Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	14-7-22	<p>This case is entrusted to touring Single Bench at A.Abad for preliminary hearing to be put there on <u>19-7-22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p> CHAIRMAN</p>
	19.07.2022	<p>Learned counsel for the appellant present and sought time for preliminary arguments being not prepared. Adjourned. To come up for preliminary arguments on 20.09.2022 before the S.B at Camp Court Abbottabad.</p> <p> (Salah-Ud-Din) Member (J) Camp Court Abbottabad</p>

To,

The Honourable Registrar
Service Tribunal KPK
Peshawar.

Subj: Deficiencies in Service Appeal.


Resp. Siv,

Reference to your letter in reply
bearing NO 622/ST dated 03-03/2022
which was received by undersigned on
20⁰⁴/₂₀₂₂ it is submitted that all the
objections are resolved from the captioned
Appeal. However objection as to Para No 12
of the memorandum of appeal it is
submitted that the relevant copies are
already annexed with the appeal.

You are humbly requested to consider
the same and an opportunity to
proceed may kindly be allowed.

Soliciting your kind favor

Dated 2⁰⁶/₂₀₂₂


Sardar Amir Qadir
Advocate HC
Office No 26 Jinnah Plaza
Abbottabad.

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: Abdul Razaq vs Chief Conservator of Forest

S.#	Contents	Yes	No
1.	This appeal has been presented by: <u>Reg Post</u>		
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 A.G/D.A.G?	✓	
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 cuttings/overwriting?		✓
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:

Amir Qadir

Signature:

[Signature]

Dated:

18-05-2022

To

THE HONOURABLE, REGISTRAR
SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR.

Subject: Deficiencies in Service Appeal.

Resp Sir,

Reference to your letter bearing No240/S.T dated 01-02-2022 vide subject noted that, all the deficiencies noted therein are cured and after completion of complete file same is being resubmitted for your kind perusal and cosiderence. Further requested regarding Para no 8 of the letter is that in the impugned seniority list my service has not been recognized by respondent/department for the purpose of seniority. In this regard ~~the~~ my submissions in Para no 07 of appeal are self explanatory. However an opportunity ~~to~~ in this regard of hearing may kindly be considered.

Soliciting your kind favor


AAMIR QADIR

Advocate High Court
Abbottabad.

0314-7366555


Dated 15-02-2022

The appeal of Mr. Abdul Razzaq son of Muhammad Ishaq Forest Guard Gallies Division Forest Circle A.Abad received today i.e. on 31.01.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ① Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Affidavit may be got attested by the Oath Commissioner.
- ④ Memorandum of appeal may be got signed by the appellant.
- ⑤ Annexures-of the appeal may be attested.
- 6- Annexure-B of the appeal is illegible which may be replaced by legible/better one.
- ⑦ Copy of departmental appeal against the impugned seniority list dated 13.01.2021 is not attached with the appeal which may be placed on it. Copy of departmental appeal attached with the appeal on page 29 is against the order dated 17.02.2019 but not a departmental appeal against the impugned seniority list dated 13.01.2021.
- ⑧ Sub-rule-4 of rules 6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974 requires that every civil servant to whom the relief claimed may affect, shall also be shown as respondents.
- ⑨- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent may also be submitted with the appeal.

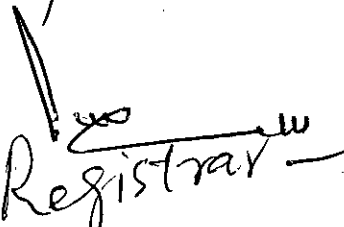
No. 240 /S.T,

Dt. 01/02 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Sardar Aamir Qadar Adv.
High Court A.Abad

Objections no 4, 5, 7 and 8 are still stand. Therefore, the appeal is returned again to the counsel for the appellant for completion and resubmission within 15 days. Copy of departmental appeal mentioned in para-12 of the memo of appeal is also not attached with the appeal the same may also be placed on it.


Registrar

No. 622 /S.T
dt. 03/03 /2022

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR,

Appeal No. 3007 /2022

Abdul Razzaq

...APPELLANT

V E R S U S

Chief Conservator of Forest & others.....

...RESPONDENTS

SERVICE APPEAL


INDEX

S.No.	Description of Document	Annexure	Page No.
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2.	Application for condonation of delay along with affidavit..	--	10-11
3.	(Copy of the appointment order	-"A"-	12
4.	(Copy of office orders, notification	"B"	13-15
5.	Copy of office order bearing no 43 dated 25-09-2004	"C"	16
6.	Copy of office order bearing no 116 dated 13-04-2005	"D"	17
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8.	Copy of seniority list dated <u>13-01-2021</u>	"F"	21-24
9.	Copy of appeal & Office order dated 08-11-2021	"G"	25-31
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...PETITIONER

Through:

Dated:- 27/01 /2022


(SARDAR AAMIR QADIR)
Advocate High Court,
Abbottabad.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR,

Appeal No. 3031 /2022

Abdul Razzaq S/o Muhammad Ishaq (Forest Guard) recently posted in Gallies Division Forest Circle Abbottabad.

...PETITIONER

V E R S U S

1. Chief Conservator of Forest Northern Forest Region II Abbottabad.
2. Conservator of Forest, Forest Lower Hazara circle Abbottabad.
3. Divisional Forest Officer Galis Forest Division Abbottabad.

R E S P O N D E N T S

SERVICE APPEAL UNDER SECTION 04 OF THE
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT 1974 AGAINST THE FINAL SENIORITY
LIST ISSUED VIDE NOTIFICATION OFFICE
ENDST: NO.3753-55/E DATED 13-01-2021 BESIDES
IMPUGNED ORDER OF RESPONDENT NO 01
DATED 08-11-2021 WHILE REJECTING THE
APPEAL OF PETITIONER/APPELLANT AND
MAINTAINING THE IMPUGNED SENIORITY
LIST DATED 13-01-2021.

Filed to-day

W
Registrar
31/01/2022.

Re-submitted to-day
and filed.

W
Registrar
13/6/2022

PRAYER:

It is prayed that on acceptance of instant service appeal, the impugned final seniority list dated 13-01-2021 may please be set-aside/nullified and the appellant be declared and placed in relevant number in seniority list dated 23-08-2019 in accordance with the existing employees status, in accordance with the prevailing rules. Any other relief which this Honorable Tribunal deems fit and proper in the circumstances of the case may also be granted in the best interest of justice.

Respectfully Sheweth

ON FACTS:-

1. That the petitioner was appointed in Respondent/ Department vide office order No 63 Dated 17/08/1987 and is still in service. Initial appointment was made against temporary posts in Soka Nullah Water Shed Initiative Forest Circle Abbottabad. *(Copy of the appointment order is attached as Annexure "A")*
2. That petitioner served in the mentioned initiative/circle for several years, till the winding up of Soka Nullah Water-Shed initiative dated 30-06-1996. After that the employees were rendered surplus and adjusted/absorbed in different other Divisions/Units in Respondent Department.
3. That petitioner was adjusted/absorbed in Natural Resource Conservation Galiyat, (NRCP) vide Office

Order No 20 dated 18-09-1996 and Office Order No 35 Dated 14-10-1996 as a permanent employee in Forest Department vide notification bearing No SOR III (FD)4-141/98 Finance Department N.W.F.P Dated:11-07-1998. And this fact was also confirmed upon departmental appeal of petitioner/appellant was order in appeal dated 29-11-2002 and office order dated 12-08-2002. (*Copy of office orders, notification is annexed as Annexure "B"*).

4. That, on 25-09-2004 vide office order no 43, petitioner was adjusted in District Government Abbottabad against the vacant post of Gallies Forest Division Abbottabad. (*Copy of office order bearing no 43 dated 25-09-2004 is annexed as Annexure "C"*).
5. That vide office order bearing No 116 dated 13-04-2005 petitioner was mutually transferred among the Forest Guards of Abbottabad circle from district government Abbottabad to Gallies Forest Division Abbottabad whom is still serving in that division. (*Copy of office order bearing no 116 dated 13-04-2005 is annexed as annexure "D"*).
6. That respondent department in light of directives and revised policy issued seniority list of forest guards serving in Gallies Abbottabad bearing no 764/E dated 23-08-2019 in which petitioner/ appellant is

placed at serial No 24. *(Copy of seniority list dated 23-08-2019 is annexed as annexure "E".)*

7. That, respondent/department on 13-01-2021 vide order No 3753-55/E issued another seniority list of Forest Guards serving in Gallis Division Abbottabad in which petitioner/appellant is placed at No 25, while list issued dated 23-08-2019, persons listed at serial No-1-3 were promoted and persons listed at serial no 21-22 retired, and at serial no 08,11,17,19,24, arrived at Gallies Division later from petitioner/appellant but were placed at top from present petitioner/appellant which act of respondents is against the policy and rules of procedure provided from time to time governing the service of appellant. *(Copy of seniority list dated 13-01-2021 is annexed as annexure "F".)*
8. That, despite the fact mentioned above and consequent recognition of the service of the appellant the respondent issued seniority list dated 13-01-2021 which is in contravention of existing law and rules made therein and liable to be set aside.
9. That the seniority list dated 13-01-2021 is apparently based on error and outcome of improper reckoning due to misreading of records etc. A blatant proof of erroneous reckoning of seniority in the impugned list is that even those inducted in service much later than the petitioner were placed much above the applicant though all of them are junior to the applicant.

10. That as per rule 17(2) of the KPK Civil Servant (Appointment Promotion & Transfer) Rules 1989, "*Seniority in the various cadre of the civil servant appointed by initial recruitment vis a vis those appointed otherwise shall be determined with reference to their dated of regular appointment to a post in that cadre.*"
11. That the appellant is entitled to equal treatment as per article 25 of the constitution of Islamic Republic of Pakistan and his seniority may be considered in accordance with merit and in light of existing rules.
12. That the appellant being aggrieved of the impugned final seniority list dated preferred a departmental appeal /representation to respondent No 01 on 29-01-2021 forward through proper channel to competent authority to entertain the same which was dismissed vide order dated 08-11-2021. *Copy of order dated 8-11-2021 is annexed as "G"*
13. That the petitioner seeks the indulgence of this Hon'able Court, *inter-alia* on the following grounds as no effective alternate remedy is available:-

GROUND:-

- a) That the appellant has not been provided equal treatment when there is no express inhibition against him under the law and has not been given equal protection of law, which is discriminatory instance of arbitrariness and is against the

principals enshrined in Article 4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.

- b) That, the appellant has been subjected to injustice and the case of appellant has not been dealt with under the principals of fair play.
- c) That this Honorable Tribunal is competent and has ample power to adjudicate the matter under appeal.
- d) That the impugned seniority list is in violation of rules and statutory provisions as well as the dicta of superior courts pronounced in a number of judgments, hence the same need to be corrected.

PRAYER:

It is prayed that on acceptance of instant service appeal ,the impugned final seniority list dated 13-01-2021 may pleased be set-aside/nullified and the appellant be declared and place in relevant number in seniority list dated 23-08-2019 in accordance with the existing employees status, in accordance with the prevailing rules. Any other relief which this Honorable Tribunal deems fit

*and proper in the circumstances of the case may also
be granted in the best interest of justice.*

Amza

...PETITIONER

Through:

Dated: 27/01 2022

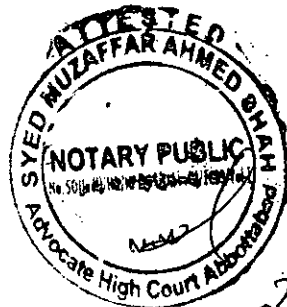
(Signature)

(SARDAR AAMIR QADIR)
Advocate High Court,
Abbottabad.

VERIFICATION:-

*Verified that the contents of the instant service appeal are true
and correct to the best of my knowledge and belief and that nothing
has been concealed from this Hon'able tribunal.*

Dated: 29/01/2022



...PETITIONER

Amza
28/01/2022

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR,

Appeal No. _____ /2022

Abdul Razzaq

...PETITIONER

V E R S U S

Chief Conservator of Forest & others.....

...RESPONDENTS

SERVICE APPEAL


CERTIFICATE

*Certified that no such like Service Appeal has earlier been
filed before this Hon'able Tribunal or any other Court of Law.*


...PETITIONER

Through:

Dated: 27/01 /2022


(SARDAR AAMIR QADIR)
Advocate High Court
Abbottabad

BEFORE SERVICES TRIBUNAL PESHAWAR
KHYBER PAKHTUNKHWA

Appeal No. /2022

Abdul Razzaq

...PETITIONER

VERSUS

Chief Conservator of Forest & others

...RESPONDENTS

SERVICE APPEAL

**APPLICATION FOR CONDONATION OF DELAY, IF
ANY, IN FILLING THE INSTANT APPEAL.**

Respectfully Sheweth,

1. That, the titled case is being filed before this Honorable Tribunal and instant application may be considered as an integral part of this appeal
2. That, appellant has impugned departmental order in appeal which was formally communicated to the appellant through sub divisional Forest Officer Bagnotar Abbottabad on **23/12/2021**, in which departmental appeal of the appellant was dismissed.
3. That, the applicant continued to pursue his matter with diligence and always kept his cause alive with the assurance to get relief today to tomorrow.
4. That, it is within the power of this Honorable Tribunal to condone any delay if so caused.
5. That, any delay if appears, was neither within the knowledge of applicant nor is intentional and therefore, is beyond the perception and control of the applicant. (*Affidavit to this effect is submitted accordingly*).

It is, therefore, humbly prayed that on acceptance of foregoing application, any delay if so caused, may graciously be condoned and the case of the applicant be decided on merits.

Nurza
...PETITIONER

Through:

Dated: - 27/9 /2022

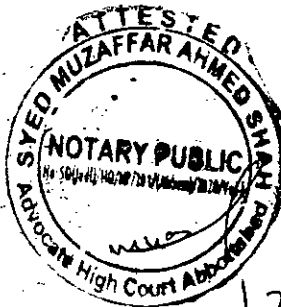
(S. AMIR QADIR)
(S. AMIR QADIR)
Advocate High Court,
Abbottabad

AFFIDAVIT:

I, Abdul Razzaq S/O Muhammad Ishaq R/O Namli Maira petitioner, do hereby solemnly affirm and declare on Oath that the contents of instant *application* are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.

DEPONENT

Dated: - 27/9 /2022



28/01/2022

...PETITIONER

Nurza

OFFICE ORDER NO. 63 DATED ABBOTTABAD THE 17/8/1987 BY MR. MUBARIK
HUSSAIN SHAH DIVISIONAL FOREST OFFICER, SOKA MULLAH WATERSHED PROJECT A'ABAD.

Ammer A¹²

Consequent upon the recommendation of Departmental Selection Committee constituted vide this office order No. 35 dated 8.7.1987 the following persons are hereby appointed as Forest Guards in HPS No. 2 (Rs. 625-16-945) @ Rs. 625/- per month plus usual allowance as admissible under the rules with effect from the date of production of their health certificates;

1. Mohammad Iqbal s/o Noor-ur-Rehman of Chittapul Tehsil and District Abbottabad.
2. Zafar Iqbal s/o Abdur Rehman village Banda Khair Ali Khan P.O. Dobaatar Tehsil and District Abbottabad.
3. Khalid Mahmood s/o Lal Khan village Nagri Bala Tehsil and District Abbottabad.
4. Wali-ur-Rehman s/o Gulzaman village Nagri Bala; Tehsil and District Abbottabad.
5. Abdul Razzaq s/o Mohammad Ishaq, village Namli Maira Tehsil and District Abbottabad.

Their appointment as Forest Guard are purely temporary and their services/employment in the Forest Department are also purely temporary and as such their services can be terminated in accordance with the Government of West Pakistan services and General Administration Department Notification No. SOXVIII-1-8/66, dated 10.7.1968 at any time, irrespective of the fact that they are holding the charges of post other than that for which is originally recruited.

If they wishes to resign at any time they would have to serve one month's notice or their one month's pay would be forfeited to Government in lieu of that.

They will be governed by such rules and orders relating to pay, house rent, travelling allowance, medical allowance, transfer etc. prevailing at the time of issue of this letter and any order issued by the Government in future.

Their appointment is subject to the following conditions:

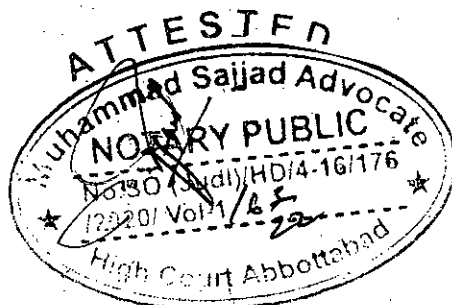
1. They would have to produce medical certificate of fitness.
2. They would have to join their services at their own expenses.
3. They are domiciled of Hazara Civil Division.

Sd/- (Mubarik Hussain Shah)
Divisional Forest Officer
Soka Mullah Watershed Project
Abbottabad

Memorandum.

Copy forwarded to the:

1. Conservator of Forests, Watershed Management Project, Abbottabad for information.
2. All concerned officials for information and necessary action.
3. Divisional Accountant for information.



S. Main
Divisional Forest Officer
Soka Mullah Watershed Project
Abbottabad

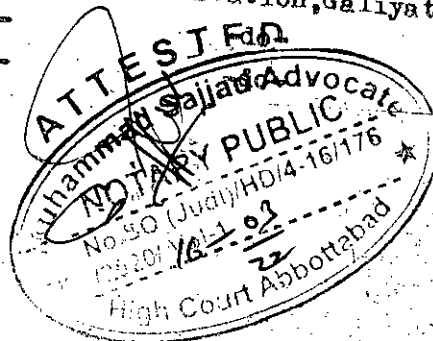
- Annex B

(13)

OFFICE ORDER NO. 20 DATED 48TH SEPTEMBER, 1996 BY
 MAQBOOL-UR-REHMAN KHAN, CHIEF CONSERVATOR OF FORESTS, SOCIAL
 FORESTRY, PESHAWAR.

In pursuance with the directives contained in Govt: of
 N.W.F.P. Forest, Fisheries & W. Life Department letter No. SO(FT.II)
 AD/II-502/96 dated 5-9-1996, the following staff rendered surplus
 in Soka Nullah Project consequent upon its winding up w.e.f.
 30-6-1996, is hereby adjusted/absorbed against 39 vacancies
 (Three Foresters and 36 Forest Guards) placed at the disposal
 of Chief Conservator of Forests, Social Forestry by Chief
 Conservator of Forests, Territorial/Conservation Region vide his
 office order No. 22 dated 10-9-1996 in units as noted against each:-

Name & Rank	Date of appointment	Trained/ Untrained	Adjusted/absorbed in unit.
I-FORESTERS			
1. Abdul Khaliq ✓	25-6-1975	Trained	Natural Resource Conservation, Galiyat.
2. Muhammad Farooq	19-8-1978	-do-	-do-
3. Nisar Ahmed	24-3-1981	-do-	-do-
I-FOREST GUARDS.			
1. Muhammad "arin	7-4-1977	Trained	Haripur Forest Divn:
2. Khizar Hayat	16-12-78	-do-	-do-
3. Mehrban Shah	4-9-1982	-do-	-do-
4. Rafaqat Ali	1-3-1984	-do-	-do-
5. Farzand Hussain	10-3-1984	-do-	-do-
6. Muhammad Sidique	4-4-1984	-do-	-do-
7. Muhammad Azam I	21-6-1984	-do-	-do-
8. Muhammad Ayaz	24-6-1984	-do-	-do-
9. Chantab	28-6-1984	-do-	-do-
10. Muhammad Amin	12-8-1984	-do-	-do-
11. Khan Mubarik	4-9-1984	-do-	-do-
12. Muhammad Nazir	10-11-1984	-do-	-do-
13. Muhammad Arshad	17-2-1985	-do-	Galis Forest Division.
14. Khurshid Gul	4-3-1985	-do-	-do-
15. Niaz Ahmed Shah	16-4-1985	-do-	Siran Forest Division.
16. Nizakat Khan	16-4-1985	-do-	-do-
17. Nazir Ahmed	16-2-1987	-do-	-do-
18. Salauddin	30-4-1987	-do-	-do-
19. Muhammad Khurshid	5-9-1982	Untrained	Natural Resource Conservation, Galiyat.
20. Muhammad Banaras	29-3-1984	-do-	-do-
21. Zubair	1-4-1984	-do-	-do-



3
14

S. No	Name of F/Guard	Date of appointment	Trained/Untrained	Adjusted/absorbed in unit
22.	Taj Mubarik ✓	8-6-1984	Untrained	Natural Resource Conservation, Galiyat.
23.	Muhammad Ilyas ✓	21-6-1984	-do-	-do-
24.	Abdul Ghafoor ✓	24-6-1984	-do-	-do-
25.	Nisar Ahmed ✓	17-7-1984	-do-	-do-
26.	Zain Muhammad ✓	14-11-1984	-do-	-do-
27.	Muhammad Rustam ✓	14-11-1984	-do-	-do-
28.	Saifur Rehman ✓	20-11-1984	-do-	-do-
29.	Ghulam Akbar ✓	9-2-1985	-do-	-do-
30.	Abdul Ghafar ✓	10-2-1985	-do-	-do-
31.	Ali Mardan ✓	17-2-1985	-do-	-do-
32.	Muhammad Iqbal ✓	17-8-1987	Trained ✓	-do-
33.	Abdur Razaq ✓	22-8-1987	-do-	-do-
34.	Jamshed Khan ✓	11-10-1987	-do-	-do-
35.	Muhammad Mushtaq	22-1-1990	-do-	-do-
36.	Muhammad Khalid	20-2-1985	Untrained	-do-

The intervening period from 1-7-1996 to that of their arrival in the respective units may be decided by the competent authority as admissible under the rules.

The adjustment/employment of the incumbants in Natural Resource Conservation, Galiyat may be ordered further by the Project Director in accordance with the provisions of the PC-I.

Sd/- Maqbool-ur-Rehman Khan,
CHIEF CONSERVATOR OF FORESTS,
SOCIAL FORESTRY REGION,
PESHAWAR.

No. 107-111 /E/PA dated Peshawar the 18-9-1996.

- Copy forwarded to the:-
- Secretary, Forests, Fisheries & W/Life Deptt: Govt: of N.W.F.P. Peshawar,
 - Chief Conservator of Forests, Territorial/Conservation Region, Peshawar,
- for information with reference to their letters cited above.
- Conservator of Forests, Watershed Abbottabad,
 - Conservator of Forests, Abbottabad Circle, Abbottabad,
 - Project Director, Natural Resource Conservation, Galiyat,
- for information and necessary action.

23/9/96
ATTESTED
Muhammad Sajjad Advocate
NOTARY PUBLIC
No. 50 (J) dated 14-16/76
Peshawar
Abbottabad

18/9/96
CHIEF CONSERVATOR OF FORESTS,
SOCIAL FORESTRY REGION,
PESHAWAR.

Annex - V

No.SOR-III(FD)4-141/98
GOVERNMENT OF N.W.F.P.
FINANCE DEPARTMENT.

Dated Peshawar, the 11.7.1998.

To

The Director Budget & Accounts,
(Forests), Government of NWFP,
Forestry, Fisheries & Wildlife,
Department, Peshawar.

Subject:- APPOINTMENT OF PROJECT DEVELOPMENT SCHEMES.

Reference your memo. No.PA/96-97/Pension/6646-47
dated 27-4-1998 on the subject noted above.

2. Finance Department advises that paragraph 3 of
Service & General Administration Department letter No.SOR-
III(S&GAD)8/38/86 dated 30-3-1989 gives an impression that the
Project employees appointed after 30-3-1989 would be on
contract basis and their service would not count for pension.
The aforesaid date may, therefore, be treated as cut off date.
The entire service of the employees who were
recruited/appointed before 30-3-1989 shall count for the
purpose of pensionary benefits provided other conditions on
the subject stand fulfilled. The Administrative Department may
also keep the provisions of Finance Department letter No.SOSR-
III(FD)4-112/80-Vol:III dated 26-7-1997 in view while
sanctioning the benefit.

sd/-
(MUHAMMAD KHAN)
SECTION OFFICER (SR-III)

Endst: No.SOSR-III(FD)4-141/98 dated Peshawar the 11/7/98.

A copy for information is forwarded to:-

1. The Section Officer (Regulation-III), Govt: of NWFP,
S&GAD with reference to his letter No. SOR-
III(S&GAD)3-38/86/77 dated 16-6-1998.
2. The Budget Officer-X, Finance Department.

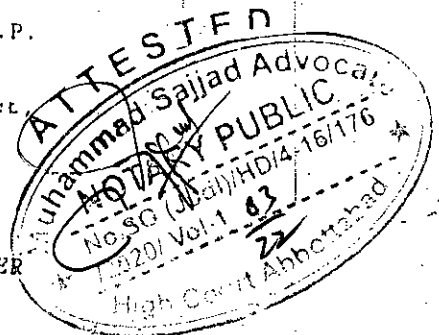
sd/-
(MUHAMMAD KHAN)
SECTION OFFICER (SR-III)

Endst: No.SOSR-III(FD)4-141/98 dated Peshawar the 25/8/98.

Copy forwarded to:-

1. The Chief Conservator of Forests, Territorial &
Conservator, N.W.F.P. Peshawar.
2. The Chief Conservator of Forests, Social Forestry,
N.W.F.P. Peshawar.
3. The Conservator of Forests, Wildlife, N.W.F.P.
Peshawar.
4. The Deputy Director of Planning, N.W.F.P. Peshawar.
5. The Project Director, Forestry Sector Project,
Peshawar.

Muhammad Khan
BUDGET & ACCOUNTS OFFICER
FORESTS.



Handwritten notes: 'Annex B' and a circled '15'.

BETTER COPY

(ISA)

NO.SOR-111(FD) 4-141/98
GOVERNMENT OF NWFP
FINANCE DEPARTMENT
Dated Peshawar, the 11-07-1998

To,

The Director Budget and Accounts
(Forests) Government of NWFP
Forestry, Fisheries, Wildlife
Department Peshawar.

Subject: APPOINTMENT OF THE DADER DEVELOPMENT SCHEME.

Reference your memo No 96-97/Pension/6646-47 Dated 27-04-1998 on the subject noted above.

Finance department advises that paragraph 3 of the Service and General Administration Department Letter No SOR III (S&GAD) 8/38/36 Dated 30-03-89 given an impression that the project employee appointed after 30-03-1989 would be on contract basis and their service would not count for pension. Therefore said date may therefore, be treated as cutoff date. The entire service of the employees who were recruited /appointed before 30-03-1989 shall count for the purpose of pensionary benefits provided other conditions on the subject stand fulfilled. The administration department may also keep the provisions of finance department letter no SOSR – III (FD) 4-112/80-VOL III dated 26-07-1997 in the view while sanctioning the benefit.

-sd-

(MUHAMMAD KHAN)
Section Officer-III

Endst No .SOSR-III (FD) 4-141/98 Dated Peshawar the 11/07/1998

A copy for information is forward to:-

1. The section officer (Regulation-III), Govt: of NWFP, S&GAD with reference to his letter no SOR-3-38/36/86/77 dated 16/06/1998.
2. The budget officer-X finance department.

-sd-

(MUHAMMAD KHAN)
Section Officer-III

Endst:-no B&A/Pen/FD/803-844-48, dated: 25/08/1998

BUDGET AND ACCOUNT

OFFICER FOREST

Amir re "C" (16)

OFFICE ORDER No. 43 DATED ABBOTTABAD THE 25 /09/2004 BY MR. MUHAMMAD HANIF KHAN, CONSERVATOR OF FORESTS, ABBOTTABAD CIRCLE, ABBOTTABAD

Due to winding up of Natural Resource Conservation Project with effect from 30-06-2004 Mr. Abdul Razzaq, Forest Guard is hereby adjusted in District Government, Abbottabad against the existing vacancy occurred due to repatriation of Mr. Javed Iqbal, Forest Guard to Galis Forest Division in the interest of public service with immediate effect.

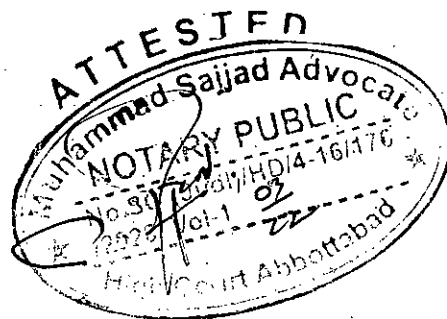
Sd/-Muhammad Hanif Khan,
Conservator of Forests,
Abbottabad Circle,
Abbottabad.

Memo.

Copy forwarded to:

- 1- The Chief Conservator of Forests, NWFP, Peshawar for favour of information with reference to his letter No.1054/E, dated 21-08-2004.
- 2- The Executive District Officer, Agriculture, Abbottabad for information and necessary action.
- 3- Mr. Abdul Razzaq, Forest Guard for information and compliance.

[Signature]
Conservator of Forests,
Abbottabad Circle,
Abbottabad.



Ameru "E"

18

SENIORITY LIST OF FOREST GUARDS IN RESPECT OF GALIS FOREST DIVISION ABBOTTABAD AS STOOD ON 30.06.2019.

S#	Name of Forest Guard	Father's Name	Date of Birth	Date of appointment	Addressed	Qualification	Trained/Untrained	EPS	Parent Division	Dated of Arrival in Division
1	2	3	4	5	6	6	7	8	9	10
1	Mohammad Fiaz	Sher Ahmed	20.3.1965	15.11.1987	VPO Malach	Matric	Trained	8		
2	Mohammad Yousaf	Ghulab Khan	15.10.1968	16.2.1987	Nagri Bala	Matric	Trained	8		
3	Ghulam Mujtaba Shah	Ghulab Shah	2.2.1968	10.4.1988	Mangal Qalanderabad	Matric	Trained	8		
4	Wajid Hussain	Mohammad Siddique	1.2.1969	12.4.1988	Malach Nathaigali	Matric	Trained	8		
5	Asif Khan	Mohammad Sabir Khan	20.3.1969	28.7.1988	kuthiala Sherwan	BA	Trained	8		
6	Mohammad Tariq	Mohammad Akbar	25.12.1967	28.7.1988	VPO Nagri Bala	Matric	Trained	8		
7	Ghulam Murtaza Fg	Allah Das Khan	6.3.1969	12.9.1988	Village Nardoba	Matric	Trained	8		
8	Imdad Hussain Shah	Mohammad Shah	7.5.1965	17.7.1984	Guldanian Aid	Matric	Trained	8	Soka Nullah	14.06.1990
9	Mohammad Pervaiz	Lal Khan	16.4.1967	22.10.1990	Malach	Matric	Trained	8		
10	Aftab Mahmood	Haider Zaman	13.3.1969	22.10.1990	Banda Pir Khan	FA	Trained	8		
11	Mohammad Maqbool	Mohammad Ashraf	1.1.1969	29.9.1991	Nowshera Ziarat Masoom	Matric	Trained	8		
12	Akhter Nawaz	Mohammad Akbar	3.1.1974	4.8.1992	Malach Nathaigali	Matric	Trained	8		
13	Zahid Hussain Shah	Muzamal Shah	5.2.1971	18.10.1993	Tori Sharif	Matric	Trained	8		
14	Shahzad Hussain	Shah Zaman	17.6.1967	7.10.1987	Havelian	Matric	Trained	8	Soka Nullah	8.2.1994
15	Mohammad Iaved	Mohammad Zaman	1.5.1970	21.6.1990	Nagri Bala	Matric	Trained	8	Haripur F. Division	4.8.1996
16	Mumtaz Ahmed	Mohammad Ashraf	15.5.1972	24.9.1991	Namli Maira	Matric	Trained	8	HSF Project	7.10.1996
17	Mr. Nizakat Khan	Sher Mohammad	7.4.1963	16.4.1985	Lamba Banda Aid	Matric	Trained	8	Siran F/Division	24.12.1985
18	Abdur Fashid	Mohammad Hussain	6.2.1969	28.9.1991	Kassapi Kalan Aid	Matric	Trained	8	HSF Project	4.6.1997
19	Mohammad Asif	Malik Muhammad Afsar	4.2.1969	26.1.1992	Shakul Bandi Aid	Matric	Trained	8	Hazara Social Forest	5.10.2007
20	Mohammad Khalid	Yar Ali	11.3.1961	20.2.1985	Kakul Aid	Matric	Trained	8	HSF Project	23.5.2002
21	Zam Mohammad	Lal Khan	1.1.1961	14.11.1984	Noja Bandi Bodla Havelian	U/Matric	Untrained	8	Soka Nullah	8.6.2002
22	Ali Mardan	Mir Alam	15.3.1964	17.2.1985	Einora Aid	Matric	Trained	8	Soka Nullah	17.8.2002
23	Mohammad Khalid	Mohammad Akbar	18.5.1973	17.9.1991	V P O Namli Maira	Matric	Trained	8	HSF Project	4.2.2004
24	Abdur Kazim	Mohammad Ishaq	4.6.1968	22.8.1987	Namli Maira	Matric	Trained	8	Soka Nullah	3.5.2005
25	Mohammad Azam	Mohammad Aslam	22-11-1959	21-6-1984	Malach Lessan	FA	Trained	8	Soka Nullah	15-12-2006
26	Mr. Saad Akhter Forest	Muhammad Iqbal	12.4.1975	24.3.2007	Teran (Tanowal)	Matric	Trained	8		
27	Malik Arif Zol	Malik Aurangzeb	20.5.1974	11.4.2008	Chatha	Matric	Trained	8		
28	Aziz-ur-Rehman	Abdur Rehman	25.3.1975	11.4.2008	Pattan Kalan	Matric	Trained	8		
29	Gul Faraz	Mohammad Afzal	10.7.1972	29.2.2009	Chatha Kalan	Matric	Trained	8		

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20/06/2019

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30	Mehran Khan	Liaqat Ali Khan	6.5.1985	2.12.2006	Kiala Havellian	FA	Untrained	8	Daur W/Sher	30.4.2009
31	Qazi Mohammad Ajmal	Qazi Abdur Rauf	20.4.1962	13.7.1980	Banda Pir Khan	Matric	Trained	8	Siran W/Shed	1.12.2009
32	Qaiser Hayat	Bashir Ahmed	5.10.1966	10.8.1985	kuthiala Sherwan	Matric	Untrained	8	Daur W/Sher	1.12.2009
33	Mr. Shamraiz	Ali Behadar	20.9.1967	20.11.1991	Kakul Atd	Matric	Trained	8	Hazara Social Forest	18.10.2012
34	Assad-ur-Rehman	Yousaf-ur-Rehman	29.1.1993	19.7.2013	Tarari (Tarnowai)	FSc	Untrained	8		
35	Nazir Ahmed	Gulhassan	10.4.1968	16.2.1987	Banda Pir Khan		Trained	8		
36	Sajjid Mehmood	Abdur Rahim	12.4.1966	1.8.1985	Banda Sapan Atd	BA	Untrained	8		
37	Muhammad Zaheer	Muhammad Rafique	10.10.1987	8.4.2015	Forest colony Atd	M.Com	Untrained	8		
38	Assad-ullah Khan	Gul Zaman	1.3.1988	8.4.2015	Bandi Pahar Boi	M.Com	Untrained	8		
39	Faraz Shafique	Muhammad Shafique	3.3.1990	8.4.2015	Malach Nathiagali	B.Com	Untrained	8		
40	Muhammad Ikhlaq	Muhammad Riaz	31.3.1991	8.4.2015	Malach Nathiagali	M.Com	Untrained	8		
41	Sardar Zohaib-ur-Rehman	Sardar Wali-ur-Rehman	20.6.1992	8.4.2015	Barrian Nagribala	B.Com	Untrained	8		
42	Muhammad Siraj	Muhammad Riaz	16.2.1993	8.4.2015	Malach Nathiagali	Fsc	Untrained	8		
43	Waqas Fayyaz	Muhammad fayyaz	16.2.1994	8.4.2015	Malach Nathiagali	Fsc	Untrained	8		
44	Muhammad Adil	Muhammad Nazir	30.4.1994	8.4.2015	Upper Kunj Jadeed Atd	MA	Untrained	8		
45	Syed Aasim Shah	Syed Bashir Ahmed Shah	26.2.1995	8.4.2015	kuthiala Atd	Fsc	Untrained	8		
46	Zubair Khan	Muhammad Iqbal	8.2.1992	9.4.2015	Nalotha P.O Nara Havellian	BA	Untrained	8		
47	Muhammad Waseem	Muhammad Nazir	10.4.1993	9.4.2015	Nagri Bale	BA	Untrained	8		
48	Zaheer Ahmed	Ghulam Mustafa	24.5.1992	10.6.2015	Nawansher Atd	MBA	Untrained	8		
49	Daniyal Ajmal	Ajmal Khan	4.09.1994	10.6.2015	Rwalakot Nawansher	Fsc	Untrained	8		
50	Ejaz Ahmed	Manzoor Ahmed	15.1.1991	12.6.2015	Tarnowai Atd	Fsc	Untrained	8		
51	Muhammad Sajjad	Muhammad Jhangir	10.2.1990	18.6.2015	Chittapui Atd		Untrained	8		
52	Muhammad Nawaz	Rajab Aii	12.10.1987	16.7.2015	Malach Nathiagali		Untrained	8		
53	Mr. Assad Bashir	Bashir Ahmed	17.4.1991	16.7.2015	Manli Maira	M. Com	Untrained	8		
54	Mr. Muhammad Adeel	Muhammad Rafique	3.12.1992	16.7.2015	Jhangi Atd		Untrained	8		
55	Mr. Muhammad Irshad	Mirza Khan	17.2.1962	17.2.1985	Banda Ghazan Khan	Matric	Trained	8	Soka Nullah	14.3.2016
56	Syed Tahir Hussain Shah	Syed Zareen Shah	30.6.1988	8.11.2016	H.No. 70/20 Umer Farooq Street supply atd	BA	Un-trained	8		
57	Toqeer Ahmed	Muhammad Khursheed	15.2.1991	8.11.2016	Muree road Aziz bang Atd	BA	Un-trained	8		
58	Mr. Adil Khan	Ghulam Nabi	16.2.1992	8.11.2016	Chonakari Nawansher Atd	DAE	un-trained	8		
59	Syed Zeeshah Shah	Syed Afzal Hussain Shah	23.12.1993	8.11.2016	Village Tori Atd	FSc	Un-trained	8		
60	Mr. Waqar Zeb	Aurangzeb	04.7.1993	25.1.2017	VPO Summunder Katha	BA	un-trained	8		

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61	Mr. Imran Khan	Ali Mardan	15.6.1991	26.1.2017	Village Kothjela, Mohallad Lund	FA	Un-trained	8		
62	Mr. Rizwan Khan	Hakim Khan	13.3.1994	26.1.2017	Village Maira Rehmat Khan	B.Com	Un-trained	8		
63	Mr. Usman Suleman	Muhammad Suleman	25.7.1988	9.2.2017	Namli Maira Khurd	DAE	Un-trained	8		
64	Mr. Mohsin Ali	Muhammad Sadiq	26.8.1994	13.2.2017	VPO Tarnowai	FA	Un-trained	8		
65	Mr. Saeed Akhter, Forest	Sultan	29.9.1991	14.2.2017	VPO Nara Tehsil Havelian	D.Com	Un-trained	8		
66	Mr. Ehtisham-ul-Haq	Muhammad Ejaz	15.02.1992	13.10.2017	Village Malach, PO Nathiagali	BA	Untrained	8		
67	Mr. Muhammad Sohail	Muhammad Rafique	08.08.1994	13.10.2017	Mohallah Kotila, village Sialkot No.02	FA	Untrained	8		
68	Mr. Waqar Ahmed	Zulfiqar Ahmed	20.02.1993	09.01.2018	Jugian Kohalian	FA	Untrained	8		
69	Mr. Huzaifa Khan	Fida Muhammad Khan	12.04.1995	09.01.2018	Mohallah Muhammadzai, Nawansher.	FA	Untrained	8		
70	Mr. Mehtab Rajab	Rajab Ali	01.06.1993	23.10.2017	Malach P.O Nathiagali	BSc	Untrained	8	Daur W/Shed	12.02.2019
71	Muhammad Mumtaz	Muhammad Irfan	16.01.1967	12.02.1985	Lambi Lari, Upper maikpura atd		trained	8	Soka Nullah	01.03.2019
72	Husnain Jamshed	Jamshed Khan	09.11.1993	13.03.2019	Lower Maikpura Maira	BBA(hons)	Untrained	8		
73	Ummar Hashmi	Muhammad Ilyas	30.11.1997	13.03.2019	Pattan Kaian Abbottabad		Untrained	8		
74	Muhammad Sohail	Muhammad Aslam	03.09.1993	14.03.2019	Village Pail, Boi	BA	Untrained	8		
75	Hammad Daud	Malik Muhammad Daud	09.05.1995	14.03.2019	P.O Qalandarabad, Bandi Dhudan	DAE	Untrained	8		
76	Husnain Khan	Ifikhar Hussain	26.02.1996	14.03.2019	Moh; Khawaja Ahmed Khel, Sheikh-ul-Bandi Atd	BA	Untrained	8		
77	Umair Pervez	Muhammad Pervez	06.11.1998	14.03.2019	Village Malach P.O Nathiagali	FSc	Untrained	8		

No. 764 IE. dated 23/08/2019

Copy forwarded to all SDFOs/RFO Birangali for information and necessary action. They are directed to circulate the seniority list amongst the Forest Guards and point out observations/ommissions (if any) from the seniority list within Fifteen (15) days otherwise the seniority list will be considered as final.

Divisional Forest Officer
Galis Forest Division
Abbottabad

[Signature]
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DATE


SENIORITY LIST OF FOREST GUARDS IN RESPECT OF GALIS FOREST DIVISION ABBOTTABAD AS STOOD ON 31.12.2020

Ammer (F) 25
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 3751813413

S#	Name of Forest Guard	Father's Name	Date of Birth	Date of appointment	Addressed	Qualification	Trained/Untrained	BPS	Parent Division	Date of Arrival in Division
1	2	3	4	5	6	6	7	8	9	10
1	Wajid Hussain	Mohammad Siddique	1.2.1969	12.4.1988	Malach Nathaigali	Matric	Trained	8		
2	Mohammad Tariq	Mohammad Akbar	25.12.1967	28.7.1988	VPO Nagri Bala	Matric	Trained	8		
3	Asif Khan	Mohammad Sabir Khan	20.3.1969	28.7.1988	kuthiala Sherwan	BA	Trained	8		
4	Ghulam Murtaza Fg	Allah Dad Khan	6.3.1969	12.9.1988	Village Nardoba	Matric	Trained	8		
5	Imdad Hussain Shah	Mohammad Shah	7.5.1966	17.7.1984 (24.12.1989)	Guldanian Atd	Matric	Trained	8	Soka Nullah (date of arrival in Haripur F/Division is 24.12.1989)	14.06.1990
6	Mohammad Javed	Mohammad Zaman	1.5.1970	21.6.1990	Nagri Bala	Matric	Trained	8		
7	Gul Khatib	Lal Khan	01.05.1966	13.09.1990	Village Maira Rehmat Khan, P.O Chattri Abbottabad	Matric	Trained	8	Haripur F.Division	4.8.1996
8	Muhammad Mumtaz	Muhammad Irfan	16.01.1967	12.02.1985 (13.09.1990)	Lambi Lari, Upper maikpura atd		trained	8	Soka Nullah	13.09.1990
9	Mohammad Pervaiz	Lal Khan	16.4.1967	22.10.1990	Malach	Matric	Trained	8		
10	Aftab Mehmood	Haider Zaman	13.3.1969	22.10.1990	Banda Pir Khan	FA	Trained	8		
11	Qazi Mohammad Ajmal	Qazi Abdur Rauf	20.4.1962	13.7.1980 (03.09.1991)	Banda Pir Khan	Matric	Trained	8	Siran W/Shed (date of arrival in Daur W/D is 03.09.1991)	1.12.2009
12	Mohammad Maqbool	Mohammad Ashraf	1.1.1969	29.9.1991	Nowshehra Ziarat Masoom	Matric	Trained	8		
13	Akhtar Nawaz	Mohammad Akbar	3.1.1974	4.8.1992	Malach Nathaigali	Matric	Trained	8		
14	Zahid Hussain Shah	Muzamal shah	5.2.1971	18.10.1993	Tori Sharif	Matric	Trained	8		
15	Mohammad Khalid	Mohammad Akbar	18.5.1973	17.9.1991 (19.10.1995)	V.P.O.Nami Maira.	Matric	Trained	8	HSF Project date of arrival in Unhar Watershed Division is 19.10.1995	4.2.2004
16	Muhammad Asif	Malik Muhammad Afsar	4.2.1969	26.1.1992 (19.03.1996)	Shaikhul Bandi Atd	Matric	Trained	8	Hazara Social Forestry (date of arrival in Agror Tanawal Forest Division is 19.03.1996)	9.10.2007

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17	Mr. Muhammad Irshad	Mirza Khan	17.2.1962	17.2.1965 (24.09.1996)	Banda Ghazan Khan	Matric	Trained	8	Soka Nullah (previously reported arrival in Galis Division 24.09.1996)	14.3.2016
18	Mr. Nizakat Khan	Sher Mohammad	7.4.1963	16.4.1985 (24.09.1996)	Lamba Banda Atd	Matric	Trained	8	Soka Nullah (date of arrival in Siran F/D is 24.09.1996)	24.12.1996
19	Nazir Ahmed	Gulhassan	10.4.1968	16.2.1987 (24.09.1996)	Banda Pir Khan		Trained	8	Soka Nullah (date of arrival in Siran Forest Division is 24.09.1996)	21.08.2013
20	Mumtaz Ahmed	Mohammad Ashraf	15.5.1972	24.9.1991 (07.10.1996)	Namli Maira	Matric	Trained	8	HSF Project	7.10.1996
21	Abdur Rashid	Mohammad Hussain	6.2.1969	28.9.1991 (04.06.1997)	Kassaki Kalan Atd	Matric	Trained	8	HSF Project	4.6.1997
22	Mohammad Khalid	Yar Ali	11.3.1961	20.2.1985 (29.07.1997)	Kakul Atd	Matric	Trained	8	Soka Nullah (date of arrival in HTFD Battagram is 29.07.1997)	23.5.2002
23	Ali Mardan	Mir Alam	15.3.1964	17.2.1985 (29.07.1997)	Binora Atd	Matric	Trained	8	Soka Nullah (date of arrival in HTFD Battagram is 29.07.1997)	12.8.2002
24	Mr. Shamraiz	Ali Behadar	20.9.1967	20.11.1991 (15.12.1997)	Kakul Atd	Matric	Trained	8	Hazara Social Forestry Project (date of arrival in W/Plan- IV is 15.12.1997)	18.10.2012
25	Abdur Razaq	Mohammad Ishaq	4.6.1968	22.8.1987 (03.05.2005)	Namli Maira	Matric	Trained	8	Soka Nullah	3.5.2005
26	Mehran Khan	Liaqat Ali Khan	6.5.1985	2.12.2006	Kiala Havellian	FA	Untrained	8	Daur W/Sher	30.4.2009
27	Mr. Saeed Akhter Fores	Muhammad Iqbal	12.4.1975	24.3.2007	Tarari (Tarnowai)	Matric	Trained	8	-	-
28	Malik Arif Zeb	Malik Aurangzeb	20.5.1974	11.4.2008	Chattri	Matric	Trained	8	-	-
29	Aziz-ur-Rehman	Abdur Rehman	26.3.1975	11.4.2008	Pattan Kalan	Matric	Trained	8	-	-
30	Gul Faraz	Mohammad Afzal	10.2.1972	20.2.2009	Chattri Kala Pani	Matric	Trained	8	-	-
31	Qaiser Hayat	Bashir Ahmed	05.10.1966	10.08.1985	Kothiala Sherwan	Matric	Un Trained	8	Daur W/Sher	1.12.2009
32	Assad-ur-Rehman	Yousaf-ur-Rehman	29.1.1993	19.7.2013	Tarari (Tarnowai)	FSc	Untrained	8	District Government	21.08.2013
33	Sajjid Mehmood	Abdur Rahim	12.4.1966	1.8.1985	Banda Sapan Atd	BA	Untrained	8	-	-
34	Muhammad Zaheer	Muhammad Rafique	10.10.1987	8.4.2015	Forest colony Atd	M.Com	Untrained	8	-	-


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35	Assad-ullah Khan	Gul Zaman	1.3.1988	8.4.2015	Bandi Pahar Boi	M.Com	Untrained	8
36	Faraz Shafique	Muhammad Shafique	3.3.1990	8.4.2015	Malach Nathiagali	M. Com	Untrained	8
37	Muhammad Ikhtaq	Muhammad Riaz	31.3.1991	8.4.2015	Malach Nathiagali	M.Com	Untrained	8
38	Sardar Zohaib-ur-Rehman	Sardar Wali-ur-Rehman	20.6.1992	8.4.2015	Barrian Nagribala	B.Com	Untrained	8
39	Muhammad Siraj	Muhammad Riaz	16.2.1993	8.4.2015	Malach Nathiagali	Fsc	Untrained	8
40	Waqas Fayyaz	Muhammad fayyaz	16.2.1994	8.4.2015	Malach Nathiagali	Fsc	Untrained	8
41	Muhammad Adil	Muhammad Nazir	30.4.1994	8.4.2015	Upper Kunj Jadeed Atd	MA	Untrained	8
42	Syed Aasim Shah	Syed Bashir Ahmed Shah	26.2.1995	8.4.2015	kuthiala Atd	Fsc	Untrained	8
43	Zubair Khan	Muhammad Iqbal	8.2.1992	9.4.2015	Nalotha PO Nara Havellian	BA	Untrained	8
44	Muhammad Waseem	Muhammad Nazir	10.4.1993	9.4.2015	Nagri Bala	BA	Untrained	8
45	Zaheer Ahmed	Ghulam Mustafa	24.5.1992	10.6.2015	Nawansher Atd	MBA	Untrained	8
46	Daniyal Ajmal	Ajmal Khan	4.09.1994	10.6.2015	Rwalakot Nawansher	Fsc	Untrained	8
47	Ejaz Ahmed	Manzoor Ahmed	15.1.1991	12.6.2015	Tamowai Atd	Fsc	Untrained	8
48	Muhammad Sajjad	Muhammad Jhangir	10.2.1990	18.6.2015	Chittapul Atd		Trained	8
49	Muhammad Nawaz	Rajab Ali	12.10.1987	16.7.2015	Malach Nathiagali		Untrained	8
50	Mr. Assad Bashir	Bashir Ahmed	17.4.1991	16.7.2015	Namli Maira	M. Com	Untrained	8
51	Mr. Muhammad Adeel	Muhammad Rafique	3.12.1992	16.7.2015	jhangi Atd		Untrained	8
52	Syed Tahir Hussain Shah	Syed Zareen Shah	30.6.1988	8.11.2016	H.No. 70/20 Umer Farooq	BA	Un-trained	8
53	Toqeer Ahmed	Muhammad Khursheed	15.2.1991	8.11.2016	Muree road Aziz.bang Atd	BA	Un-trained	8
54	Mr. Adil Khan	Ghulam Nabi	16.2.1992	8.11.2016	Chonakari Nawansher Atd	DAE	un-trained	8
55	Syed Zeeshah Shah	Syed Afzal Hussain Shah	23.12.1993	8.11.2016	Village Tori Atd	FSc	Un-trained	8
56	Mr. Waqar Zeb	Aurangzeb	04.7.1993	25.1.2017	VPO Summunder Katha	BA	un-trained	8
57	Mr. Imran Khan	Ali Mardan	15.6.1991	26.1.2017	Village Kothiela Mohallad lund	FA	Un-trained	8
58	Mr. Rizwan Khan	Hakim Khan	13.3.1994	26.1.2017	Village Maira Rehmat Khan	B.Com	Un-trained	8
59	Mr. Usman Suleman	Muhammad Suleman	25.7.1988	9.2.2017	Namli Maira Khurd	DAE	Un-trained	8
60	Mr. Mohsin Ali	Muhammad Sadiq	26.8.1994	13.2.2017	VPO Tamowai	FA	Un-trained	8
61	Mr. Saeed Akhter	Sultan	29.9.1991	14.2.2017	VPO Nara Tehsil Havelian	D.Com	Un-trained	8
62	Mr. Ehtisham-ul-Haq	Muhammad Ejaz	15.02.1992	13.10.2017	Village Malach, PO Nathiagali	BA	Untrained	8
63	Mr. Muhammad Sohail	Muhammad Rafique	08.08.1994	13.10.2017	Mohallah Kotila, village Sialkot No.02	FA	Untrained	8
64	Mr. Waqar Ahmed	Zulfqar Ahmed	20.02.1993	09.01.2018	Jugian Kohalian	FA	Untrained	8

ATTESTED & ACCEPTED
BY COUNSEL
SIGNED
DATE

24

65	Mr. Huzaiifa Khan	Fida Muhammad Khan	12.04.1995	09.01.2018	Mohallah Muhammadzai, Nawansher	FA	Untrained	8		
66	Mr. Mehtab Rajab	Rajab Ali	01.06.1993	23.10.2017	Malach P.O Nathiagali	BSc	Untrained	8	Daur W/Shed	12.02.2019
67	Husnain Jamshed	Jamshed Khan	09.11.1993	13.03.2019	Lower Malikpura Maira	BBA(hons)	Untrained	8		
68	Ummar Hashmi	Muhammad Ilyas	30.11.1997	13.03.2019	Pattan Kalan Abbottabad		Untrained	8		
69	Hammad Daud	Malik Muhammad Daud	09.05.1995	14.03.2019	P.O Qalandarabad, Bandi Dhudan	DAE	Untrained	8		
70	Husnain Khan	Iftikhar Hussain	26.02.1996	14.03.2019	Moh; Khawaja Ahmed Khel, Sheikh-ul-Bandi Atd	BA	Untrained	8		
71	Umair Pervez	Muhammad Pervez	06.11.1998	14.03.2019	Village Malach P.O Nathiagali	FSc	Untrained	8		
72	Muhammad Riaz	Wali Dad	10.04.1968	08.11.1988	Kasala NagriBala Abbottabad	Matric	Trained	8	Haripur Division	05.08.2019

Note: the seniority list has been prepared according to the decision taken at Item No. 5 in Minutes of Meeting held on 05.10.2020 in the office of Chief Conservator of Forests Northern Forest Region-II Abbottabad and the directions of Conservator of Forests Lower Hazara Forest Circle Abbottabad vide letter No. 6579-81/B&A dated 31.12.2020

No. 3753-SS /E, dated 13/01/2021

Copy forwarded to:

- 1 Chief Conservator of Forests Northern Forest Region-II Abbottabad.
 - 2 Conservator of Forests Lower Hazara Forest Circle Abbottabad.
- For favour of information, please.
- 3 All SDFOs/RFO for information and necessary action. They are directed to circulate the same amongst their sub-ordinate Forest Guards with the direction to point out any observation / omission within a week, otherwise the same will be considered as final seniority, please.

Divisional Forest Officer
Galis Forest Division
Abbottabad

SOMMS
ATTESTED & ACC
BY COUNSEL
 SIGNED _____
 DATE _____

25

Mr. Abdur Razzaq Forest Guard/JFT has preferred an application/ appeal regarding grant of Annual increments and amount of pay as well as new pay scale.

Amex 9

The application has been scrutinized and the following views are highlighted:-

- 1- The Project employees recruited prior to 20.3.89 have been declared regular/permanent while those who have been appointed after 20.3.89 may be considered as contract employees. In the instant case, the appellant has been appointed on 17.8.87 vide DFO Soka Nullah Office Order No.63 dated 17.8.87.
- 2- The appellant was adjusted on contract basis in NRCP vide Office Order No.2 dated 24.11.96.
- 3- The appeal filed before the NWFP Service Tribunal against his termination which was made on the abolishment of Soka Nullah but the appeal was dismissed by the court on 14.7.98 due to re-adjustment of appellant in the Deptt:
- 4- In the PRB meeting held on 4.3.97 the following staff was allowed to recruit in permanent basis subject to the consistence of PC-I provisions as well as preparation of recruitment plan:-

- 1- Forest Guard 2 Nos.
- 2- Drivers 2 Nos.
- 3- Peons 2 Nos.
- 4- Chowkidar 2 Nos.
- 5- Sweeper 2 Nos.

Keeping in view of the decisions two drivers have been working in this Project since long,, but the record is silent regarding approval of plan for engagement of permanent staff. It is also added, that the other Forest Guards of his batch have been adjusted on regular strength else-where.

In view of above, if so approved, an advice of Conservator of Forests Abbottabad may be obtained about further course of action to be taken in this regard please.

However, the case is put up for favour of kind perusal and order H.

Sd. ne/p

with drawing

2/9

ATTESTED

Muhammad Sajjad Advocate

NOTARY PUBLIC

No. SO (Judi)/HD/4-16/176

12/20/11-1

High Court Abbottabad

26

OFFICE OF THE CONSERVATOR OF FORESTS, ABBOTTABAD CIRCLE,
ABBOTTABAD.

To

The Project Director,
Natural Resource Conservation
Project in Galiat, Abbottabad.

526

03-12-02

No. 3716 /GE dated Abbottabad the 29 /11/2002.

Subject APPEAL OF MR. ABDUR RAZZAQ, FOREST GUARD.

Memo. P-89
Reference your letter No. 2174/E/NRCP, dated 14-11-2002.

It is to inform you that M/S Saif-ur-Rehman and Abdur Razzaq, Forest Guards were retained in Natural Resource Conservation Project against the two posts of Forest Guards approved by the Ist Project Review Board meeting held on 04-03-1997 and as per request contained in your letter No.489/NRCP, dated 14-03-1997. On his request, Mr. Saif-ur-Rehman, Forest Guard was transferred to Kohistan Forest Division, whereas the appellatant is still serving in NRCP.

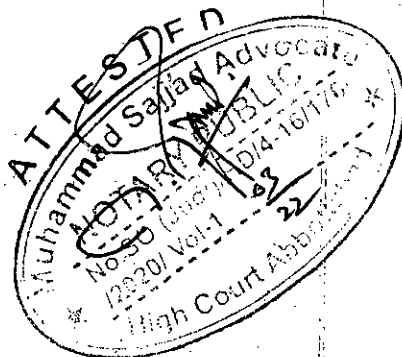
P-145
(F-16-E)

The appellatant was appointed before 30th March,1989 and entitled to get increment, please see to it and consider case of allowing increment, and fixation of pay accordingly in the light of instructions on the subject.

As regards, release of pay for the period from 01-07-1996 to 23-09-1996, the said period has already been treated as Extra Ordinary Leave without pay vide Project Director, NRCP office order No.02, dated 24-10-1996. The Forest Guard can not be transferred to any other Forest Division as no post of Forest Guard exists at the present.

P-25
Conservator of Forests,
Abbottabad Circle,
Abbottabad.
(T/Mir)

Ec
Handwritten signature and initials



Annex 135
27

OFFICE OF THE CONSERVATOR OF FORESTS, ABBOTTABAD CIRCLE,
ABBOTTABAD.

To

The Project Director,
Natural Resource Conservation
Project in Galiat, Abbottabad.

No. 3714

/GE dated Abbottabad the 29/11/2002.

Subject

APPEAL OF MR. ABDUR RAZZAQ, FOREST GUARD.

Memo.

Reference your letter No. 2174/E/NRCP, dated 14-11-2002.

It is to inform you that M/S Saif-ur-Rehman and Abdur Razzaq, Forest Guards were retained in Natural Resource Conservation Project against the two posts of Forest Guards approved by the Ist Project Review Board meeting held on 04-03-1997 and as per request contained in your letter, No. 489/NRCP, dated 14-03-1997. On his request, Mr. Saif-ur-Rehman, Forest Guard was transferred to Kohistan Forest Division, whereas the appellant is still serving in NRCP.

The appellant was appointed before 30th March 1989, and entitled to get increment, please see to it and consider case of allowing increment and fixation of pay accordingly in the light of instructions on the subject.

As regards, release of pay for the period from 01-07-1996 to 23-09-1996, the said period has already been treated as Extra Ordinary Leave without pay vide Project Director, NRCP office order No.02, dated 24-10-1996. The Forest Guard can not be transferred to any other Forest Division as no post of Forest Guard exists at the present.

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

ATTESTED & ACCEPTED
BY
COUNSEL
SIGNED
DATE

Annex - X (137)

OFFICE OF THE PROJECT DIRECTOR NATURAL RESOURCE CONSERVATION
PROJECT IN GALIAT ABBOTTABAD.

To

The Conservator of Forests
Abbottabad Circle, Abbottabad.

28

No. /E/NRCP, Dated Abbottabad the 21 /12/2002.

Subject: APPEAL OF MR. ABDUR RAZZAQ FOREST GUARD.

Reference. Your office letter No. 3714/GE, dated 29.11.2002.

It is submitted that the approval of the PRB contained in the minutes of meeting held on 4.3.1997 for recruitment of regular staff was only for one year conditionally in consistence to the PC-I provisions and actual requirements.

Since there is no provision in PC-I for recruitment of field staff on permanent basis against prescribed posts therefore, this issue was not considered by Project Review Board.

Keeping in view the above circumstance, no annual increments was allowed to the appellant. Moreover, the appeal of the Forest Guard is of similar nature under which Mr. Saifur Rehman, Forest Guard was adjusted in Kohistan Forest Division vide Conservator of Forests, Abbottabad Office order No. 47 dated 25.11.1997.

It is, therefore, requested to kindly consider the appeal of Mr. Abdur Razzaq Forest Guard and he may be adjusted else-where and allowed annual increments since 1996 as well as other service benefits as per rules.

Project Director
Natural Resource Conservation
Project in Galiat Abbottabad.

No. 2462 /E/NRCP,

Copy forwarded to Mr. Abdur Razzaq Forest Guard C/O Range Officer CFR-I NRCP Abbottabad for information.

Project Director
Natural Resource Conservation
Project in Galiat Abbottabad

ATTESTED
2002

To,

1. Chief Conservator of Forest Hazara Region II Abbottabad.
2. Conservator of Forrest, Forest Lower Hazara Abbottabad.

29

Through proper channel:

Subject: Departmental appeal against the order of Divisional Forest Officer Gallies Abbottabad bearing No 4781-93/E (Seniority FG) Abbottabad dated 17/02/2019.

Dear Sir,

With due regards it is submitted that we the petitioners are serving in forest department on regular basis. On 06/09/2019 through in application we requested office of the Divisional Forest Officer Gallies Abbottabad for redressal of our grievance regarding impugned seniority list prepared by department upon which office rejected our petition vide impugned order dated 17/02/2019.

Instant service appeal is submitted before your good self Inter alia on following grounds.

1. That petitioner were appointed in forest department and is still in service of department.
2. That Provincial Government reorganized the different sectors of department upon which petitioners were adjusted in different division and are serving in Gallies Division Abbottabad.
3. That after reorganization of department and consequential merger of petitioner in Gallies Division arose a controversy of seniority among the employees already serving in gallies division and the one so merged /adjusted.
4. That office of the Divisional Forest Officer issued seniority list of employees serving in gallies division and placed the petitioners in lowest numbers of seniority for the purpose of promotion .*(Copy of impugned seniority list is annexed as annexure 'A')*
5. That petitioners are employees of same division /department and they were adjusted by the provincial government due to reorganization of forest department they were neither declared surplus nor absorbed in parent division, since they are employee of same division and serving since last 15 years approximately, there inter se seniority is to be reckoned from the date of initial appointment nor from arrival in parent division .*(Copy of relevant rules regarding seniority are annexed as annexure "B")*.
6. That Office of Divisional Forest Officer Gallies Abbottabad dismissed petitioner's application for considering their case of seniority and for revising seniority list in accordance with law.

ATTESTED & ACCEPTED
BY COUNSEL
SIGNED
DATE

- 30
7. That petitioner vide application dated 22-09-2020 requested Divisional Forest Officer Gallies Abbottabad for revising impugned seniority list in the light of notification/ order bearing No 2069-90 dated 16-09-2020 of **Chief Conservator Of Forrest Northern Forest Region –II KPK Abbottabad** for revising their seniority list and considering them in accordance with law which response is still awaited.
 8. That petitioner has left with no other efficacious remedy left, so, the instant appeal has been preferred before your good self.
 9. That office of the **Chief Conservator Of Forrest Northern Forest Region –II KPK Abbottabad** vide order mentioned issued directions for considering petitioners for their inclusion in seniority list as per law.

Therefore, we request you to re examine our case in the light of facts placed on record and consider the petitioner seniority by revising the impugned seniority list dated 30-06-2019 in accordance with rules /policies.

Kindly , impugned seniority list be set-aside and directions be passed for issuing revise seniority list by considering petitioners inter-se seniority in accordance with law .Further requested that operation of impugned seniority list bearing No 764/E dated 30-06-2019 be suspended till decision of instant appeal .

Thanking you,

1. Muhammad Ajmal(FG) _____
2. Imdad Hussain Shah (FG) _____
3. Muhammad Mumtaz 1st (FG) _____
4. Muhammad Irshad. (FG) _____
5. Ali Mardan. (FG) _____
6. Nazakat Khan. (FG) _____
7. Abdul Razzaq. (FG) _____
8. Nazeer Ahmed. (FG) _____
9. Muhammad Shamraiz. (FG) _____
10. Zain Muhammad. (FG) _____
11. Muhammad Khalid. (FG) _____

Dated 29-10-2020

.....PETITIONERS

ATTESTED
BY
SIGNED
DATE

7) یہ کہ سائل کے بعد گنیز ڈورن میں صاف رپورٹ کرنے والے صدر زمین

سائل سے کیے سبز ہو گئے ہیں جسکا ثبوت سناری لسٹ 31/12/20 بجام

سیرین نمبر 11، 16، 17، 19، 24 ہے اور سرسبز نمبر 1، 2، 3، 4 پرو مشور

فائر ہو گئے ہیں عین سرسبز نمبر 20، 21 اپنا مدت حدزمت پوری کرنے کے لئے

ریٹائرڈ ہو چکے ہیں (کمال کف عدا ہے)

8) - یہ کہ سناری کے بنیادی دو حقوق ہیں - اول Date of Appointment

اور دوم Date of Arrival

9) - یہ کہ سائل کو ان دو حقوق / قانون سے کیوں محروم رکھا گیا ہے اگر سائل کو

Date of Appointment سے سناری ملتی ہے تو سائل کا 5/6 واں نمبر بنتا ہے اور

Date of Arrival سے سناری کو شمار کیا گیا ہے تو سائل کو 18/09/1996 سے

دکاٹے تو بھی سائل کا نمبر 9/10 بنتا ہے اگر سائل کو 03/05/2005 سے سناری دینی ہے

تو گنیز ڈورن میں صدر زمین کے لئے سبز کرنے میں

بنا حیرت بنیادی حق حناثر میں کیا گیا ہے

اور خواہت کی جاتی ہے سائل کی سناری کو درست کیا جائے اور انصاف کے تقاضوں

تحت نظر آتے ہوئے سائل کو حق دیا جائے۔ سائل اپنے تمام قانونی حق محفوظ رکھنا

سائل کو Date of Appointment کے حساب سے سناری دیا جائے

ATTESTED & RECEIVED
SIGNED BY COMMISSIONER
DATE

ATTESTED
Muhammad Sajjad Ady
NOTARY PUBLIC
No. 30 (Judicial) HD/4-16/176
129201 Vol-1
High Court Abbottabad

Ministry of Revenue
No. 10957
Dated 21.04.2014

Attest
04
14/02



OFFICE OF THE DIVISIONAL FOREST OFFICER
GALIS FOREST DIVISION
ABBOTTABAD

Email: dfogalies@gmail.com, Tel: (+92)992-9310306

No. 1650 /E (seniority FG)

Dated Abbottabad the 8/11/2021



31

To,

Mr. Abdur Razzaq Forest Guard
C/O SDFO Bagnotar

Subject:

APPEAL OF MR. ABDUR RAZAQ FOREST GUADR CLAIMING THE SENIORITY FOR THE DATE OF APPOINTMENT

Memo;

The Appellate Authority i.e. Conservator of Forests Lower Hazara Forest Circle Abbottabad has cancelled your subject appeal vide letter No. 3844/GE dated 27.10.2021 with a remarks that:

"The seniority list prepared by the office of Divisional Forest Officer Galis Abbottabad in accordance to the minutes of the meeting of Chief Conservator of Forests Northern Forest Region-II Abbottabad dated 05.10.2020 which is correct according to the law/rules, hence the appeal of the Forest Guard is hereby cancelled"

Divisional Forest Officer
Galís Forest Division
Abbottabad

Received from SDFO office Bagnotar
Nuzar
23/12/21

ATTESTED
SIGNED
DATE

F-0

Annexure "H"

32

NOTICE UNDER REGISTERED A.D

To


1. Chief conservator of forest Peshawar northern forest region II Abbottabad.
2. Conservator of forest, Forest Lower Hazara Circle Abbottabad.
3. Divisional Forest Officer Galies Forest Division Abbottabad.

SUBJECT: INTIMATION NOTICE REGARDING THE SERVICE APPEAL TITLED "Abdul Razzaq VS Chief Conservator of Forest Etc";

Undersigned has filed a service appeal titled "Abdul Razzaq VS Chief Conservator of Forest Etc" before the before Khyber PakhtunKhwa services tribunal Peshawar against impugned seniority list issued by department, and you are hereby served with the instant notice under the requirement of law for information please.

Copy of the appeal is also annexed herewith for ready reference.

Dated: - 27/01/2022


(SARDAR AAMIR QADIR)
Advocate High Court,
Abbottabad.

29/1/2022

12:41

Abbottabad
GPO

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SARDAR AAMIR
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Peshawar
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Place of Practice ABBOTTABAD

Name of Advocate SARDAR AMIR QADIR

33



S. No. 23613

وکالت نامہ

بعدالت: حباب حیدر خٹو خواجہ
 عنوان: عبدالرزاق
 منجانب: ایڈووکیٹ
 نوعیت مقدمہ: سررس ایپل
 باعث تحریر آنکہ: خود

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواہد ہی برائے پیشی یا تصفیہ مقدمہ بمقام ایٹ آف آف کے لیے

S. AMIR QADIR ADVOCATE H-C ABBOTTABAD

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بروقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہو گا۔ اگر پیشی پر مقدمہ میری غیر حاضری کی وجہ سے کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل یا پکھری کے اوقات سے پہلے یا پیچھے پیش ہوئے اور مقدمہ پکھری کے علاوہ کسی ہونے یا بروز تعطیل یا پکھری کے اوقات سے پہلے یا پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا بخانہ کے واپس کرنے میں صاحب موصوف ذمہ دار نہ ہو گا۔ مجھ کو کل ساختہ پر داخست صاحب موصوف مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل گزارانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور نازل کرنے اور ہر قسم کے بیان دینے اور اس پر ثالثی و راضی نامہ و فیصلہ برحلف کر سنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جائے جرم و جرائم از پکھری صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا کٹ طرفہ درخواست حکم اتناعی یا ترقی یا اگر قاری قبل از گرفتاری و اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا نیگی علیحدہ بخانہ پیروی کا اختیار ہوگا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار حاصل ہوگا کہ مقدمہ مذکور یا اس کے کسی جزوی کاروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے بنا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہونگے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانب التوا پر سے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

مورخہ: 27/01/2022

دن مہینہ سال

نوٹ: اس وکالت نامہ کی فوٹو کاپی نا قابل قبول ہوگی۔

لہذا وکالت نامہ لکھ دیا ہے کہ سندر ہے۔
 مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

S. Amir Qadir
 Advocate High Court
 Abbottabad

عبدالرزاق

Amir Qadir