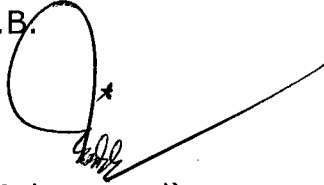


04.07.2022

Learned counsel for the appellant present. Clerk of learned counsel for respondent No. 1 present. Mr. Riaz Ahmad Painsakhel, Assistant Advocate General for respondents No. 2 & 3 present.

Clerk of learned counsel for respondent No. 1 requested for adjournment on the ground that learned counsel for respondent No. 1 is busy in the august Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 16.09.2022 before the D.B.



(Mian Muhammad)
Member (E)



(Salah-ud-Din)
Member (J)

16.09.2022

Appellant present through counsel.

Muhammad Adeel Butt, learned Additional Advocate General for respondents present.

Arguments could not be heard as learned Member Executive (Miss. Fareeha Paul) is on leave. Therefore, case is adjourned to 28.11.2022 for arguments before D.B.



(Rozina Rehman)
Member (J)

06.01.2022

Clerk to counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Reply/comments on behalf of respondents are still awaited. Learned Additional Advocate General of respondents sought time for submission of reply/comments. Last opportunity is granted to respondents to furnish reply/comments on or before next date, failing which their right to submit reply/comments shall be deemed as struck off by virtue of this order. To come up for arguments before the D.B on 20.04.2022.



(Atiq-Ur-Rehman Wazir)
Member (E)

20th April, 2022

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG for respondents present.

On previous date last opportunity was given to the official respondents for submission of written reply/comments, failing which their right to submit reply has been deemed to be struck off by virtue of that order. Neither written reply of the official respondents received nor any responsible representative is in attendance. As their right to submit reply be struck off, therefore, the appeal is fixed for final arguments on 04.07.2022 before D.B.



Chairman

15356/20

P.S

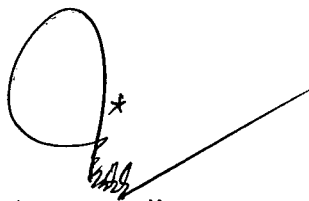
22.06.2021


Learned Addl. A.G be reminded about the omission and for submission of Reply/comments within extended time of 10 days.


Chairman

27.10.2021

Mr. Amjid Nawaz, Advocate, for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present and sought time for submission of reply/comments. Adjourned. To come up for submission of reply/comments as well as arguments on 31.12.2021 before the D.B.


(Mian Muhammad)
Member (E)


(Salah-Ud-Din)
Member (J)

Due to winter vacation to
come up for the same as before
on 6-1-2022




Reader

Continued

21.01.2021

Later on, learned counsel for appellant put appearance and preliminary arguments heard. File perused.

Appellant Deposited
Security & Process Fee

Points raised need consideration. Admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to respondents for written reply/comments. To come up for written reply/comments on 19.04.2021 before S.B.

(Rozina Rehman)
Member (J)

19.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 10.06.2021 for the same as before.

Reader

10.06.2021

Junior to counsel and Mr. Kabirullah Khattak, Addl. AG for the respondents present.

Written reply not submitted. Learned AAG is required to contact the respondents. The respondents are directed to submit written reply/comments in office within 10 days, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 27.10.2021 before the D.B.

*Stipulated period has passed
and reply has not been
submitted.*

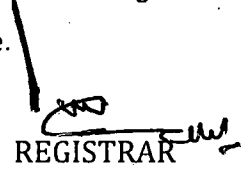


Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 15356 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge		
1	2	3		
1-	02/12/2020	<p>The appeal of Mr. Salah-ud-Din presented today by Mr. Saadullah Khan Marwat Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>2-</p>		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>21/01/2021</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>21.01.2021</p> <p>Nemo for appellant.</p> <p>Notice be issued to appellant/counsel for 27.04.2021 for preliminary hearing, before S.B.</p> <p style="text-align: right;"> (Rozina Rehman) Member (J)</p>

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

S.A. No. 15356/2020

Salah-ud-Din

versus

Secretary & Others

I N D E X

S. No.	Documents	Annex	P. No.
1.	Memo of Appeal		1-5
2.	E & T Service Rules dated 07-04-2005	"A"	6-12
3.	Amendment in the Rules dated 30-03-2010	"B"	13-21
4.	Subsequent Amendment of the Rules dated 19-09-2018	"C"	22-29
5.	Representation dated 03-08-2020	"D"	30-32

Appellant

Through



Saadullah Khan Marwat
Advocate
21-A, Nasir Mansion,
Shoba Bazaar, Peshawar

Dated 30-11-2020

Ph: 0300-5872676

BEFORE THE KP SERVICE TRIBUNAL, PESHAWARAppeal No. 15356/2020

Salah-ud-Din S/o Badshah Zarin
 Director Revenue, Excise and
 Taxation Department,
 Auqaf Complex, Shami Road,
 Peshawar..... Appellant

VERSUS

1. Secretary, Government of
 KP, Excise and Taxation
 Department, Peshawar.
2. Secretary, Govt. of KP,
 Establishment Department,
 Civil Secretariat, Peshawar.
3. Chief Secretary, Government
 Of KP, Civil Secretariat,
 Peshawar..... Respondents

⇔<=>⇔<=>⇔<=>⇔<=>⇔

**APPEAL UNDER SECTION 4 OF THE SERVICE
 TRIBUNAL ACT, 1974 AGAINST OFFICE
 NOTIFICATION NO. SO(ADMN)ET&NC/1-
 41/2018 DATED 16-02-2018 OF RESPONDENT
 NO. 01, WHEREBY FURTHER PROMOTION TO THE
 POST OF DIRECTOR GENERAL B-20 WAS
 BLOCKED FOR EVER FOR NO LEGAL REASON.**

⇔<=>⇔<=>⇔<=>⇔<=>⇔=

Respected Sir:

1. That appellant was appointed as Excise and Taxation Officer B-17 in the year 2005 in the department on the recommendation of Public Service Commission. He was promoted to the post of Deputy Director B-18 in the year 2010 and was further upgraded to the post of Director BS-19 on satisfactory performances of the official duties.
2. That on 14-06-2002, KP Excise and Taxation Department introduced Service Rule, 2002. The same were published in the Official Gazette of KP on 07-04-2005 which regulates services of the employees of different categories of the Department.

In the said rules, post of Director General, Excise and Taxation was to be filled in:-

- i. By promotion on the basis of Seniority Cum-fitness, from amongst the Deputy Directors having Five year service as such

"OR"

15 years service as Excise and Taxation Officer and Deputy Director, who have passed the Departmental Examination in higher Standard; and

- ii. If no suitable Deputy Director is available for promotion, by transfer of a suitable officer. (Copy as Annex "A")

3. That on 30-03-2010, the aforesaid service rules of the year, 2002 was further amended in the year, 2010, known as "Excise and Taxation Service Rules, 2010."

In these amended rules, the post of Director General, Excise and Taxation was to be filled in:-

- i. By transfer

"OR"

- ii. By promotion, on the basis of seniority cum-fitness, from amongst the Deputy Directors, Excise and Taxation having five years service as such Or 15 year service in B-17 and above. (Copy as Annex "B")
4. That on 19-09-2018, subsequent notification was issued by the department wherein former service rules of the year 2002 and 2010 were superseded and the post of Director General was to be filled in:-
- By transfer from amongst the officers of All Pakistan Unified Group (APUG) / Pakistan Administrative Service (PAS) / Provincial Civil Service-Secretariat Group (PCS-SG) / Provincial Civil Service Executive Group (PCS-EG) / Provincial Management Service (PMS). These rules omitted post of Deputy Directors, Excise and Taxation Department from the former Rules of the year, 2002 and 2010, meaning thereby that by now Deputy Director will never see a post of Director General B-20 in future his whole service career.
- Some others posts were also inserted therein, like:-
- i. Director (Administration BPS-19).
- ii. Director (Revenue BPS-19)
- iii. Director (BPS-19), etc. (Copy as Annex "C")
5. That appellant, being employee of the Excise & Taxation Department became adversely affected by the Rules of the year, 2018, so filed representation on 03-08-2020 before the authority which is pending disposal till date. (Copy as annex "D")

Hence, this appeal, inter alia on the following grounds:


GROUND S.

- a. That in all departments of the provinces as well as of the whole country, first priority is given in the Act/Rules to the employee of the parent department and not to out-class employees.
- b. That Excise, Taxation and Narcotics Control Departments is the main pillar of the Province in collection of billion of taxes each year to meet the expenditure of the Govt. but its employees were ousted from the run of promotion, like dead fly from the milk.

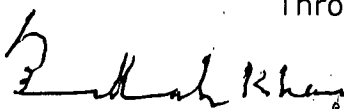
- c. That in the rules of the year, 2002 and even in the year 2010, priority in promotion was given to the employees of the parent department but in the rules of the year 2018, priority was given to outer class which is against the vested rights of the employees of the parent department.
- d. That the rules of the year, 2018 are not only unlawful and prejudicial to the interest of appellant but have completely blocked the way of promotion of the Excise and Taxation staff of the department. No protection of promotion was given in the rules of the year, 2018 to its employees.
- e. That Service Rules, 2002 and even 2010 protected promotion of the staff of the department up to the post of Director General but the rules of the year, 2018 completely banned way of promotion of the staff of the parent department.
- f. That the service rules of the year, 2018 all together changed the former position of the employees of the department.
- g. That the service rules of the year, 2018 is not only totally illegal and in effective as neither the Govt. (Cabinet and Chief Minister) gave approval for enactment of the same.
- h. That service rules of the year, 2018 is also illegal and unlawful as no one of the parent department would have a chance for promotion and transfer to the post of Director Admin, 25% Directors and Director General but the same chance and facility was given to officers from other cadres having no basic knowledge of the Taxation System.
- i. That the said enactment of the year, 2018 is not only detrimental to the rights and career of promotion of appellant but is also illegal and void-ab-initio.
- j. That the said rules are also violative of the KP Civil Servant Act, 1973 by blocking way of promotion of the employees of the department to the post of Directors and Director General.

- k. That the employees of Excise and Taxation Department of other provinces have ample chances of promotion to the top level of the hierarchy.
- l. That law and constitution of Pakistan provides equal treatment to all citizens of the country including employees of the departments for better chances.
- m. That service rules of the year, 2018 of the department are not only against the law but are based on malafide.

It is, therefore, most humbly prayed that on acceptance of the Appeal, Notification No. SO(Admn)ET&NC/1-41/2018, dated 16-02-2018 of R. No. 01 be set aside / modified to the extent of the post of Directors B-19 and Director General B-20 and appellant be given chance for promotion to the said posts, with such other relief as may be deemed proper and just in circumstances of the case.

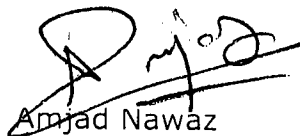

Appellant

Through


Saadullah Khan Marwat


Miss Rubina Naz


Arbab Saiful Kamal


Amjad Nawaz

Dated: 26-11-2020

Advocates



North-West Frontier Province

Published by Authority

PESHAWAR, THURSDAY, 7TH APRIL, 2005.

GOVERNMENT OF N.W.F.P
EXCISE & TAXATION DEPARTMENT

NOTIFICATION.

Dated 14th June, 2002.

No.SO(Estt)/E&T/1-41/2000. In exercise of the powers conferred by section 26 of the North-West Frontier Province Civil Servants Act, 1973 (N.W.F.P. Act No.XVIII of 1973), read with Cabinet Division, Government of Pakistan's Notification No.SRO 475(1)/2001, dated 28.06.2001, and in supersession of this Department Notification No.8752/Estb: E&T,77, dated the 19th April 1987, the Governor of the North-West Frontier Province is pleased to make the following rules, namely:

THE NORTH-WEST FRONTIER PROVINCE EXCISE & TAXATION DEPARTMENT SERVICE RULES, 2002.

1. Short title and commencement.--- (1) These rules may be called the North-West Frontier Province Excise & Taxation Department Service Rules, 2002.
 - (2) They shall come into force at once.
2. Definitions.--- In these rules, unless the context otherwise requires,-
 - (a) "Appendix" means the appendix to these rules;
 - (b) "Department" means the Excise & Taxation Department, Government of the North-West Frontier Province, and for the purpose of these rules, includes the Directorate of Excise & Taxation, North-West Frontier Province;
 - (c) "Post" a post borne on the Department as specified in column 2 of the appendix and such other posts as Government may, from time to time, add to it.
3. Recruitment/appointment to posts.--- The posts specified in column 2 of the Appendix shall be filled in such manner and subject to such qualifications and such conditions as specified against each in column 2 to 5 of the said Appendix.

SECRETARY TO GOVT OF N.W.F.P.
EXCISE & TAXATION DEPARTMENT

**GOVERNMENT OF NWFP
EXCISE & TAXATION DEPARTMENT**

SR.NO.	Nomenclature of post	Minimum qualification for appointment by initial recruitment/transfer	Age limit	Method of recruitment
1	2	3	4	5
1	Director General, Excise and Taxation.	Bachelor Degree from a recognized University.		<p>i) By promotion, on the basis of Seniority-Cum-Fitness, from amongst the Deputy Directors having five years service as such or fifteen years service as Excise & Taxation Officer and Deputy Director, who have passed the Departmental Examination in higher standard; or</p> <p>ii) If no suitable Deputy Director is available for promotion, by transfer of a suitable officer.</p>
2	Deputy Director, Excise & Taxation	Bachelor Degree from a recognized University.		<p>i) By promotion, on the basis of Seniority-Cum-Fitness, from amongst the Excise & Taxation officers with at least five years Service as such or ten years Service as Assistant Excise & Taxation officer and Excise & Taxation officer; or</p> <p>ii) If no suitable Excise & Taxation officer is available for promotion, by transfer of suitable officer.</p>

SR.NO.	Nomenclature of post	Minimum qualification for appointment by initial recruitment/transfer	Age limit	Method of recruitment
1	2	3	4	5
3	Excise & Taxation Officer	Bachelor Degree from a recognized University.	21 to 32 years	(i) Fifty per cent by Promotion, on the basis of Seniority-cum-Fitness, from amongst the Assistant Excise Taxation Officers with at least 5 years service as such, who have passed Departmental examination in higher grade; and (ii) Fifty per cent by initial recruitment, on the recommendation of the Public Service Commission based on the result of a competitive Examination conducted by it, in accordance with the Syllabus prescribed for the competitive Examination under the West Pakistan Civil Service (Executive Branch) Rules, 1964 duly amended by Govt: of NWFP S&GAD vide Notification No. SOS-II(S&GAD)(8)(2)/73 dated, 24th/31st August, 1986.
4	Accounts Officer	(i) M.Com. in Accounting from a recognized University. (ii) Certificate in Microsoft Office. (Ms.Word, Ms.Excel, Ms. Access).	21 to 32 years	By initial recruitment.
5	Assistant Accounts Officer	(i) B.Com. from a recognized university; and (ii) Certificate in Microsoft Office (Ms. Word, Ms. Excel, Ms. Access, Ms. Power Point).	21 to 32 years.	By Initial Recruitment

SR.NO.	Nomenclature of post	Minimum qualification for appointment by initial recruitment/transfer	Age limit	Method of recruitment
1	2	3	4	5
6	Computer Programmer	(i) 2 nd Class Master Degree in Computer Science from a recognized University; and (ii) Two years experience in a Govt. Department / Semi-Govt./Public Corporation or any well reputed Private Organization.	26 to 35 years.	(i) Fifty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Data Processing Supervisor with at least five years service as such; and (ii) Fifty per cent by initial recruitment.
7	Superintendent			By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Scale Stenographers with at least five years service as such or ten years total service in the Department as Junior Scales Stenographer and Senior Scale Stenographer
8	Assistant Excise & Taxation Officer			By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the post of Inspector, Excise & Taxation with at least five years service as such, and who have passed Departmental examination in higher grade.
9	Data Processing Supervisor	(i) Second Class Bachelor's Degree with Computer Science from a recognized university; and (ii) One year's experience in the field of Data Control or Key Punch	21 to 32 years	(i) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Key Punch Operator's/Data Entry Operator with atleast three years service as such; and (ii) Fifty percent by initial recruitment.

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SR.NO.	Nomenclature of post	Minimum qualification for appointment by initial recruitment/transfer	Age limit	Method of recruitment
1	2	3	4	5
10	Inspector Excise & Taxation	i) Bachelor's Degree from a recognised University; and ii) Computer literacy Certificate in Microsoft Office (Ms. Word, Ms. Excel, Ms. Access, Ms. Power Point).	21 to 32 years	(i) Fifty per cent by promotion, on the basis of seniority-cum-fitness, from amongst Assistants with minimum five years service as such; and (ii) Fifty per cent by initial recruitment.
11	Senior Scale Stenographer	i) Bachelor's Degree from a recognized University; ii) A speed of hundred Words per minutes in Shorthand in English & forty words per minute in typing; and iii) Computer Literacy (Certificate in Office Automation).	18 to 32 years	By promotion, on the basis of seniority-cum-fitness, from amongst Junior Scale Stenographers (BPS-12), with at least 5 years service as such; provided that if no suitable candidate is available for promotion, then by initial recruitment.
12	Junior Scale Stenographer	i) Intermediate or equivalent qualifications from a recognised Board; ii) A speed of eighty words per minute in shorthand in English and 35 words per minutes in typing; and	18 to 32 years	By initial recruitment.

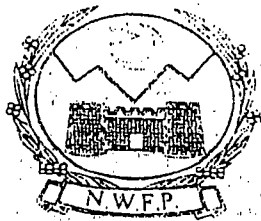
SR.NO.	Nomenclature of post	Minimum qualification for appointment by initial recruitment/transfer	Age limit	Method of recruitment
1	2	3	4	5
		iii) Computer Literacy (Certificate in Office Automation).		
13	Data Entry Operator/ Key Punch Operator.	i) Intermediate, with Statistics, Economics or Mathematics/ Physics as one of the subjects; and ii) A minimum speed of thousand Key depressions per hour for punching/data entry/verification.	18 to 32 years	By initial recruitment
14	Assistant	i) Bachelor's Degree from a recognized University; and ii) Computer literacy (Certificate in Office Automation).	18 to 32 years.	1. Fifty per cent by promotion, from amongst the Senior Clerks; and 2. Fifty per cent by initial recruitment.
15	Senior Clerk			By promotion, on the basis of seniority-cum-fitness, from amongst the Junior Clerks with at least five years service as such.
16	Junior Clerks	i) Intermediate or equivalent qualification from a recognized Board; and ii) Computer Literacy.	18 to 32 years	(i) Twenty Five per cent by promotion, on the basis of seniority-cum-fitness, from amongst Qasid/Daftry in the Excise & Taxation Department with atleast 2 years service as such, who have passed Secondary School Certificate examination; and (ii) Seventy five per cent by initial recruitment.

==

1	2	3	4	5
SR.NO.	Nomenclature of post	Minimum qualification for appointment by initial recruitment/transfer	Age limit	Method of recruitment
17	Excise & Taxation Constable	Secondary School Certificate (Height.....57") (Chest.....33 with expansion of 1 1/2 inches).	18 to 30 years	(i) Twenty five per cent by promotion, on the basis of seniority-cum-fitness, from amongst Distillery Security Guards; and (ii) Seventy five per cent by initial recruitment
18	Driver	Secondary School Certificate and possessing a valid Light Transport Vehicle License, with at least three year's experience of practical driving.	18 to 32 years	By initial recruitment.
19	Distillery Security Guard	Secondary School Certificate	18 to 32 years	By initial recruitment.
20	Daftri/Qasid			By promotion from amongst Naib Qasids.
21	Naib Qasid (BPS-1)	Middle	18 to 32 years	By initial recruitment.
22	Chowkidar/Mali/Sweeper	Preferably literate	18 to 32 years	By initial recruitment.

NWFP GOVERNMENT GAZETTE EXTRAORDINARY 7TH APR

B
EXTRAORDINARY
GOVERNMENT



13 30-3-10
REGISTERED NO. P.III
GAZETTE

North-West Frontier Province

Published by Authority

PESHAWAR, TUESDAY, 30TH MARCH, 2010.

GOVERNMENT OF THE NORTH-WEST FRONTIER PROVINCE
EXCISE & TAXATION DEPARTMENT
SERICE RULES, 2010.

NOTIFICATION

Peshawar dated the 30th March, 2010.

No. SO(Estt)E&T/1-41/2009: - In pursuance of the provisions contained in sub-rule (2) of rule (3) of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of all rules issued in this behalf, the Excise & Taxation Department in consultation with the Establishment and the Finance Departments, hereby lays down the method of recruitment, qualifications and other conditions, specified in column No. 3 to 5 of the Appendix to this Notification which shall be applicable to posts in the Excise & Taxation Department specified in column 2 of the said Appendix.

SECRETARY
GOVERNMENT OF THE NORTH-WEST FRONTIER PROVINCE
EXCISE & TAXATION DEPARTMENT

737

Printed and published by the Manager,
Staty. & Ptg. Deptt., NWFP, Pesh.

**GOVERNMENT OF NWFP
EXCISE & TAXATION DEPARTMENT
SERVICE RULES, 2010.**

APPENDIX

SR.NO.	Nomenclature of post	Minimum qualification for appointment by initial recruitment/transfer	Age limit	Method of recruitment
1	2	3	4	5
1	Director General, Excise and Taxation.	Bachelor's Degree from a recognized University.	---	i) By transfer; or ii) By promotion, on the basis of seniority-cum-fitness, from amongst the Deputy Directors, Excise & Taxation having five years service as such or fifteen years service in BS-17 and above.
2	Deputy Director, Excise & Taxation.	Bachelor's Degree from a recognized University.	---	i) By promotion, on the basis of seniority-cum-fitness, from amongst the Excise & Taxation officers with at least five years Service as such or ten years service as Assistant Excise & Taxation Officer and Excise & Taxation Officer; or ii) If no suitable Excise & Taxation officer is available for promotion, then by transfer of suitable officer.

SR.NO.	Nomenclature of post	Minimum qualification	Age limit	Method of recruitment
1	2	3	4	5
3	Taxation Analyst	(a) i. MBA with Finance, from a recognized University; or ii. M.Com from a recognized University; and (b) i. Computer Literate with certificate in Microsoft Office (MS-Word, MS-Excel, MS-Access); and ii. three years experience in field relating to Taxation in Public / Private Sector, Autonomous/Semi Autonomous Bodies.	25-35 Years	By initial recruitment.
4	System Analyst	i. Ist Class Master's Degree in Computer Science; or equivalent qualification from a recognised institute; and ii. three years experience in field of Electronic Data Processing with System Designing and Programming Skills.	25-35 Years	By initial recruitment

15

SR.NO. 1	Nomenclature of post 2	Minimum qualification 3	Age limit 4	Method of recruitment 5
5	Excise & Taxation Officer.	Second Division Bachelor's Degree from a recognized University.	21 to 30 years	<p>(a) i. Forty six per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Assistant Excise & Taxation Officers (BS-16) with at least 5 years service as such, who have passed the departmental examination in higher grade; and</p> <p>ii. Four per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Superintendents (BS-16) with at least 5 years service as such, who have passed the departmental examination in higher grade; and</p> <p>(b) Fifty per cent by initial recruitment, on the recommendations of N.W.F.P. Public Service Commission based on the result of a competitive Examination conducted by it, in accordance with the Syllabus prescribed for the Competitive Examination under Government of North-West Frontier Province Provincial Management Service Rules, 2007.</p>
6	Accounts Officer.	<p>i. Second Class Master's Degree in Commerce with Accounting as one of the subject, from a recognized University; and</p> <p>ii. one year Diploma in Computer Science from the Board of Technical Education.</p>	21 to 32 years	By initial recruitment.

16/

SR.NO.	Nomenclature of post	Minimum qualification	Age limit	Method of recruitment
1	2	3	4	5
7	Computer Programmer.	(i) Second Class Master's Degree in Computer Science from a recognized University; and (ii) two years experience in a Government Department /Semi-Government/Public Corporation or any well reputed Private Organization.	26 to 35 years.	(i) Fifty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Data Processing Supervisors with at least five years service as such; and (ii) Fifty per cent by initial recruitment.
8	Assistant Excise & Taxation Officer.	---	---	By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the post of Inspectors, with at least five years service as such, and who have passed Departmental examination in higher grade.
9	Superintendent.	---	---	By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Scale Stenographers with at least five years service as such or ten years total service in the Department as Junior Scale Stenographer and Senior Scale Stenographer
10	Assistant Accounts Officer.	i. Second Class Bachelor's Degree in Commerce from a recognized University; and ii. one year Diploma in Computer Science from the Board of Technical Education.	21 to 32 years	By Initial Recruitment

21

SR.NO.	Nomenclature of post	Minimum qualification	Age limit	Method of recruitment
1	2	3	4	5
11	Senior Scale Stenographer	(i) Second class Bachelor's Degree from a recognized University; (ii) a speed of hundred words per minute in Shorthand in English & forty words per minute in typing; and (iii) one year Diploma in Computer Science from the Board of Technical Education.	18 to 32 years	By promotion, on the basis of seniority-cum-fitness, from amongst Junior Scale Stenographers (BPS-12), with at least 5 years service as such; provided that if no suitable candidate is available for promotion, then by initial recruitment.
12	Inspector	(i) Second Class Bachelor's Degree, from a recognised University; and (ii) One year Diploma/Certificate in Computer Science from the Board of Technical Education.	21 to 32 years	(i) Fifty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Sub-Inspectors with at least five years service as such who have passed the departmental examination in lower grade; and (ii) Fifty per cent by initial recruitment.
13	Data Processing Supervisor.	(i) Second Class Bachelor's Degree with Computer Science from a recognized university; and (ii) one year's experience in the field of Data Control or Key Punch Operation.	21 to 32 years	(i) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Key Punch Operators/Data Entry Operators with at least three years service as such; and (ii) Fifty percent by initial recruitment.

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1	2	3	4	5
SR.NO.	Nomenclature of post	Minimum qualification	Age limit	Method of recruitment
14	Junior Scale Stenographer	(i) Intermediate or equivalent qualifications from a recognized Board; and (ii) a speed of fifty words per minute in shorthand in English and thirty five words per minute in typing and knowledge of Computer in using MS-Word & MS- Excel.	18 to 32 years	By initial recruitment.
15	Data Entry Operator/ Key Punch Operator.	(i) Intermediate, with Statistics, Economics or Mathematics/ Physics as one of the Subjects from a recognized Board; and (ii) a minimum speed of ten thousand Key depressions per hour for punching/data entry/verification.	18 to 32 years	By initial recruitment

19

744 N.W.F.P. GOVERNMENT GAZETTE, EXTRAORDINARY, 30th MARCH, 2010.

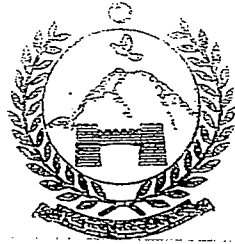
SR.NO.	Nomenclature of post	Minimum qualification	Age limit	Method of recruitment
1	2	3	4	5
16	Sub Inspector			By promotion on the basis of seniority-cum-fitness from amongst Assistant Sub-Inspectors with at least five years service as such.
17	Assistant Sub-Inspector	i) Intermediate or equivalent qualification from a recognized Board; ii) One year certificate in Computer Science/Information Technology from Board of Technical Education; and iii) (Height...5' 7") (Chest...33" with expansion of 1 1/2 inches).	18 to 32 years	i) Forty per cent by promotion on the basis of seniority-cum-fitness from amongst the constables Excise & Taxation Department with at least five years service as such; and ii) Sixty per cent by initial recruitment.
18	Excise & Taxation Constable	Secondary School Certificate (Height.....5'7") (Chest.....33" with expansion of 1 1/2 inches).	18 to 30 years	By initial recruitment from amongst bonafide residents of district concerned.

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N.W.F.P. GOVERNMENT GAZETTE, EXTRAORDINARY, 30th MARCH, 2010. 745

SR.NO.	Nomenclature of post	Minimum qualification	Age limit	Method of recruitment
1	2	3	4	5
19	Wireless Operator	i. Secondary School Certificate from a recognized Board of Intermediate & Secondary Education; and ii. a certificate in Telecommunication from a recognized Polytechnic/Vocational institution or equivalent qualification from a recognized institute.	18-30 years	By initial recruitment from amongst bonafide residents of district concerned.
20	Driver	Secondary School Certificate from a recognized Board of Intermediate and Secondary Education and possessing a valid Light Transport Vehicle License, with at least three year's experience of practical driving.	18 to 32 years	By initial recruitment from amongst bonafide residents of district concerned.
21	Distillery Security Guard	Secondary School Certificate	18 to 32 years	By initial recruitment from amongst bonafide residents of district concerned.
22	Daftri/Qasid			By promotion from amongst Naib Qasids.
23	Naib Qasid	Middle	18 to 32 years	By initial recruitment.
24	Chowkidar/Mali/Sweeper	Preferably literate	18 to 32 years	By initial recruitment.

EXTRAORDINARY
GOVERNMENT



REGISTERED IN THE
GAZETTE

*Service Rules
2018.*

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, FRIDAY, 16TH FEBRUARY, 2018

GOVERNMENT OF KHYBER PAKHTUNKHWA
EXCISE, TAXATION AND NARCOTICS CONTROL DEPARTMENT

NOTIFICATION

Peshawar, Dated the 19th February, 2018.

No. SO(Admin)/ET&NC/1-41/2018: —In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa, Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of all previous rules, issued in this behalf, the Excise, Taxation & Narcotics Control Department in consultation with the Establishment and Finance Departments hereby lays down the method of recruitment, qualifications and other conditions specified in column 3 to 5 of the Appendix to this Notification, which shall be applicable to posts in the Directorate General Excise, Taxation and Narcotics Control Department specified in column 2 of the said Appendix.

APPENDIX

S.No.	Nomenclature of the post.	Minimum qualification for appointment by Initial recruitment.	Age limit.	Method of recruitment.
1	2	3	4	5
1	Director General (BPS-20).	---	---	By transfer from amongst the officers of APUG/PAS/PCS-SG/PCS-EG/PMS.
2	Director (Administration) (BPS-19).	---	---	By transfer from amongst the officers of APUG/PAS/PCS-SG/PCS-EG/PMS.

19-2-18

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C

3	Director (Revenue) (BPS-19).	----	----	By Promotion, on the basis of seniority cum fitness, from amongst the Excise and Taxation Officers with at least twelve years service in BPS-17 and above.
4	Director (BS-19).	----	----	(a) Seventy five percent by promotion, on the basis of seniority-cum-fitness, from amongst the Excise and Taxation Officers with at least twelve years service in BPS-17 and above; and (b) twenty five percent by transfer from amongst the officers of APUG/PAS/PMS.
5	Deputy Director (Audit and Accounts) (BPS-18).	----	----	By promotion, on the basis of seniority-cum-fitness, from amongst the Assistant Directors (Audit and Accounts), with at least five years service as such: Provided that if no suitable person is available for promotion then by transfer from amongst the Government officers.
6	Deputy Director Operation-IT (BPS-18).	At least Second Class Master's Degree in Computer Science/IT/Software Engineering/ Electrical Engineering or equivalent qualification from a recognized University with at least three years experience in relevant field.	25 to 32 years.	By promotion, on the basis of seniority-cum-fitness, from amongst the Computer Programmers, Network Engineers and Web Developers having at least five years service as such: Provided that if no suitable person is available for promotion then by initial recruitment.
7	Deputy Director (GIS) (BS-18).	(i) At least Second Class Master's Degree in GIS from recognized University with three years experience in the field of GIS; or (ii) at least Second Class Master's Degree in Computer Science / IT / Urban Development / Geography or equivalent qualification in the field of Computer Science from a recognized University / Institute with Post Graduate Diploma in GIS from a recognized Institute with three years experience in the field of GIS.	25 to 32 years.	By initial recruitment.

		Note: Preference will be given to those who have rich experience in open source web-based software related with GIS.		
	Taxation Analyst (BS-18).	(i) At least Second Class MBA with Finance or M.Com, from a recognized University; (ii) computer literate with certificate in MS-Office (MS-Word, MS-Excel, MS-Access); and (iii) three years experience in field relating to Taxation in public / private sector, Autonomous / Semi-autonomous bodies.	25-32 years.	By initial recruitment.
	System Analyst (BS-18).	(i) 1 st Class Master's Degree in Computer Science or equivalent qualification from a recognized University; and (ii) Three years experience in field of Electronic Data Processing with system designing and programming skills.	25-32 years.	By initial recruitment.
10	Excise and Taxation Officer (BS-18).	---	----	By promotion, on the basis of seniority-cum-fitness, from amongst the Assistant Excise and Taxation Officers with at least five years service as such who have passed Departmental Examination in higher grade.
11	Assistant Director (Audit and Accounts) (BPS-17).	At least Second Class Master's Degree in Commerce with Accounting as one of the subject from a recognized University	22-32 years.	(a) Thirty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Audit and Accounts Assistants; and (b) seventy percent by initial recruitment.

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Computer Programmer (BS-17).	At least Second Class Master's Degree in Computer Science (BCS, BSCS, BE(CE), BS(IT) or equivalent qualification from a recognized University having good programming skills.	22-32 years.	By promotion, on the basis of seniority-cum-fitness, from amongst the Computer Operators with at least seven years service as such: Provided that if no suitable person is available for promotion then by initial recruitment.
Network Engineer (BPS-17).	At least Second Class Master's Degree in Computer Science (BCS, BSCS, BE(CE), BS(IT) and MCS or equivalent qualification from a recognized University. Note: Preference will be given to those having certificate in Computer Networking like MCSE/CCNA/any other latest certification in Networks from recognized Institute.	22-32 years.	By initial recruitment.
Web Developer (BPS-17).	At least Second Class Master's Degree in Computer Science (BCS, BSCS, BE(CE), BS(IT) and MCS or Equivalent qualification from a recognized University. Note: Preference will be given to those having Certificate in web programming like PHP, ASP, Net, C#, or any other latest technology certification in web-dev. and additional working knowledge of CSS, jQuery and web development frame work like Laravel. etc.	22-32 years.	By initial recruitment.
15	Assistant Excise and Taxation Officer (BPS-17).	20-32 years.	(a) Six percent by promotion, on the basis of seniority-cum-fitness, from amongst the Superintendents with at least five years service as Superintendent and Stenographers, who have passed the Departmental Examination in higher grade;

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			(b) fifty four percent by promotion, on the basis of seniority-cum-fitness, from amongst holder of the post of Inspectors, with at least five years service as such who have passed Departmental Examination in higher grade; and
			(c) forty percent by initial recruitment.
	Superintendent (BPS-17).	----	By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Scale Stenographers with at least five years service as such, or ten years service in the Department as Junior Scale Stenographer and Senior Scale Stenographer.
26 / 7	Inspector (BPS-16).	(i) At least Second Class Bachelor's Degree, from a recognized University; and (ii) (Height...5' 7") (Chest...33" with expansion of 1 ½ inches).	20-32 years. (a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Sub Inspectors with at least five years service as such who have passed the Departmental Examination in lower grade; and (b) fifty percent by initial recruitment.
8	Assistant Data base Administrator (BPS-16).	At least Second Class Bachelor's Degree in Computer Science or equivalent qualification from a recognized University.	20-32 years. By initial recruitment.
9	Senior Scale Stenographer (BPS-16).	(i) At least Second Class Bachelor's Degree from recognized University; (ii) a speed of hundred words per minute in English shorthand and Forty words per minute in typing; and (iii) one year Diploma in Computer Science from the Board of Technical Education.	20-32 years. By promotion, on the basis of seniority-cum-fitness, from amongst Junior Scale Stenographers with at least five years service as such: Provided that if no suitable candidate is available for promotion, then by initial recruitment

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20	Computer Operator (BPS-13).	<p>(i) At least Second Class Bachelor's Degree in Computer Science/Information Technology (BCS/BIT four years) from a recognized University; or</p> <p>(ii) at least Second Class Bachelor's Degree from a recognized University with one year Diploma in Information Technology from a recognized Board of Technical Education; and</p> <p>(iii) Minimum speed of ten thousand key depressions per hour for punching / data entry/ verification</p>	20-32 years.	By initial recruitment.
21	Audit and Accounts Assistant (BPS-14).	At least 2nd Class Bachelor's Degree in Commerce (B.Com, BBA, etc) or equivalent qualification from a recognized University having good knowledge of Computer Technology.	20-32 years.	By initial recruitment.
22	Junior Scale Stenographer (BPS-14).	<p>(i) At least Second Class Intermediate or equivalent qualification from a recognized Board; and</p> <p>(ii) a speed of fifty words per minute in English Shorthand and thirty five words per minute in typing and knowledge of Computer in using MS-Word & MS-Excel.</p>	18-32 years.	By initial recruitment.

23	Sub-Inspector (BPS-14).	----	----	By promotion, on the basis of seniority cum-fitness, from amongst the Assistant Sub Inspectors with at least five years service as such.
24	Assistant Sub-Inspector (BPS-11).	(i) At least Second Class Intermediate or equivalent qualification from a recognized Board; and (ii) (Height...5'7") (Chest...33" with expansion of 1½ inches).	18-32 years.	(a) Forty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Excise and Taxation Constables having Secondary School Certificate from a recognized Board with at least five years service as such, and (b) sixty per cent by initial recruitment.
25	Excise and Taxation Constable (BPS-07).	(i) At least Second Class Secondary School Certificate from a recognized Board; and (ii) (Height.....5'7") (Chest.....33 with expansion of 1 ½ inches).	18-30 years.	(a) Twelve percent by promotion, on the basis of seniority-cum-fitness, from amongst the Class-IV employees having SSC qualification with at least seven years service; (b) three percent by promotion, on the basis of seniority-cum-fitness, from amongst the Drivers having SSC qualification with at least seven years service; (c) eighty five percent by initial recruitment.
26	Wireless Operator (BPS-07).	(i) At least Second Class Secondary School Certificate from a recognized Board; and (ii) Certificate in Telecommunication from a recognized Polytechnic / Vocational Institution or equivalent qualification from a recognized institute.	18-30 years.	By initial recruitment.
27	Driver (BPS-06).	At least Second Class Secondary School Certificate from a recognized Board and possessing a valid Light Transport Vehicle license, with at least three years experience of practical driving.	18-32 years.	By initial recruitment.

28	Distillery Security Guard (BPS-03).	At least Second Class Secondary School Certificate from a recognized Board.	18-40 years.	By initial recruitment.
29	Dafti/Qasid (BPS-04).	----	----	By promotion form amongst the Naib Qasids and Chowkidars.
30	Naib Qasid (BPS-03).	Preferably literate.	18-40 years.	By initial recruitment.
31	Chowkidar/Mali/Sweeper (BPS-03).	Preferably literate.	18-40 years.	By initial recruitment.

**SECRETARY TO
GOVERNMENT OF THE KHYBER PAKHTUNKHWA,
EXCISE, TAXATION AND NARCOTICS CONTROL
DEPARTMENT.**

"B"

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

No.

Appeal No. 15356 of 20 20

Salah-ud-din Appellant/Petitioner

Versus
Sary Court KPK Excise Peshawar Respondent

Respondent No. 2

Notice to:

Secretary Court KPK Establishment
Deptt. Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on 19/4/2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 3th

Day of 15-6-20 2021

[Signature]
Private Secretary to
Secretary Establishment

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

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

"B"

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

No.

Appeal No. 15358 of 20 20

Salah-ud-din Appellant/Petitioner

Versus

Sery. Govt. KPK Excise Peshawar Respondent

Respondent No. ?

Notice to:

Chief Secretary Govt. KPK
Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on..... 19/4/2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

office Notice No. dated.....

Given under my hand and the seal of this Court, at Peshawar this..... 3th

Day of..... FEB..... 20 21

19/2



Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

“B”

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

S.B

No.

Appeal No. 153056 of 20 20

Salah-ud-din Appellant/Petitioner

Versus

Secy Court. KPK EXCISE Peshawar Respondent

Respondent No. 1

Notice to:

Secretary Court. KPK EXCISE and Taxation
Deptt. Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on 19/4/2021 at 8:00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 31st

Day of Feb 20 21



Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

SERVICE APPEAL NO. 15356 OF 2020

Salah ud Din.....Appellant

Versus

Government of Khyber Pakhtunkhwa & others.....Respondents

PARAWISE COMMENTS ON BEHALF OF THE RESPONDENTS NO. 01, 02 & 03

Respectfully Sheweth:

PRELIMINARY OBJECTIONS:

1. That the appellant has got no cause of action and locus standi to file the instant appeal.
2. That the appeal is not maintainable and is incompetent in the eyes of Law in the present form.
3. That the appellant was bound to file departmental appeal/ representation within 30 days in case if he was aggrieved from any order/ notification of the competent authority, which he did not file, therefore, the instant appeal is time barred and he is not entitled for the relief claimed.
4. That the appellant is estopped by his own conduct to file this appeal.
5. That the appellant has not come to the tribunal with clean hands and has suppressed all relevant and material facts.
6. That the appeal has been mis-oriented, mis-constructed and mistakenly drawn and is incompetent in its present frame and context, and is therefore, liable for rejection.
7. That the respondents have power to change the Rules any time for better running of official business and the rules impugned in the instant appeals are made for the whole Province in the public interest, not for the benefit of any specific person/individual.

ON FACTS.

1. Pertains to the perusal record of the appellant, hence, no comments.
2. Pertains to record, hence, no comments.
3. Pertains to the rules, however, it is stated that Provincial Government had the power to make and amend rules, therefore, the said rules had been amended but in the larger interest of the public.


4. Pertains to the rules. However, it is also submitted that the Provincial Government had the mandate and authority to make and amend rules. Reliance is placed on PLD 2017 SC 105/2017, SCMR 2017 that is a settled law that the Court of law has no jurisdiction to add or subtract to the clear word of a statute.
5. Incorrect, hence denied. That the appellant was bound to file departmental appeal/ representation within 30 days in case if he was aggrieved from any order/ notification of the competent authority, which he did not file, therefore, the instant appeal is time barred and he is not entitled for the relief claimed. It merits mentioning here that he filed departmental representation after a considerable time i.e. lapse of almost two years, which was regretted by the competent authority, being devoid of any legal merit. It is further added that rules were made for the betterment of the Department and not for the benefit of any specific individual.

ON GROUNDS:

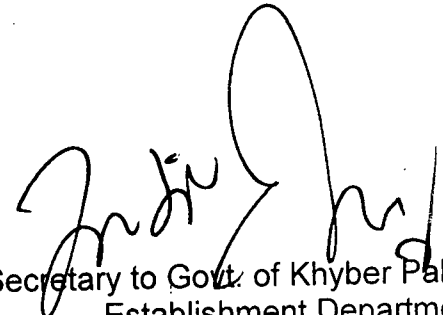
- A. Incorrect, hence denied. As explained in Paras 3, 4 & 5 of the facts.
- B. Incorrect, hence denied. It is further submitted here that rules were made for the whole Department, not for/ against any individual. Position has already been explained in the preceding Paras.
- C. Incorrect, hence denied. Burden of proof lies on the appellant.
- D. Incorrect, hence denied, therefore, no comments.
- E. Incorrect, hence denied. As explained in preceding Paras.
- F. Incorrect, hence denied, therefore, no comments.
- G. Incorrect, hence denied. Respondents have been delegated powers by the Government for making/ amending rules.
- H. Rules were made according to law, hence Para is denied.
- I. Incorrect, hence denied, no comments.
- J. Incorrect, hence denied, no comments.
- K. No comments.
- L. Legal in nature, hence, no comments.
- M. Incorrect, hence denied. Moreover, rules were made for the whole province for the betterment of the department and not against any individual on the basis of malafide intention.

Respondents seek leave of the honourable Tribunal to advance additional grounds at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of this para-wise comments the appeal may graciously be dismissed.



Secretary to Govt. of Khyber Pakhtunkhwa,
Excise Taxation Department
Respondent No. 01



Secretary to Govt. of Khyber Pakhtunkhwa,
Establishment Department
Respondent No. 02



for Chief Secretary, Govt. of Khyber Pakhtunkhwa,
Respondent No. 03