

29th September, 2022

Appellant alongwith his counsel present. Mr. Muhammad Adeel Butt, Additional Advocate General for official respondents No. 1 to 5 and counsel for private respondents No. 11 & 12 present.

Learned counsel for private respondents No. 11 & 12 seeks adjournment on the ground that he has not prepared the brief of the instant appeal. Adjourned. To come up for arguments on 24.10.2022 before the D.B at Camp Court D.I.Khan.



(Salah Ud Din)
Member (Judicial)
Camp Court D.I.Khan



(Kalim Arshad Khan)
Chairman
Camp Court D.I.Khan

24.10.2022

Junior to counsel for appellant present.

Kabir Ullah Khattak, learned Additional Advocate General alongwith Sohail Ahmad Shah Additional Assistant Commissioner for respondents present.

Bench is incomplete and lawyers are on strike, therefore, case is adjourned to 21.11.2022 for arguments before D.B at Camp Court, D.I.Khan.



(Rozina Rehman)
Member (J)
Camp Court, D.I.Khan

25.01.2022

Tour is Cancelled, therefore, case is adjourned to 24.05.2022 for the same as before.


Reader.

24.05.2022

Appellant alongwith his counsel present. Mr. Abdul Haleem, Superintendent alongwith Mr. Farhaj Sikandar, District Attorney for official respondents No. 1 to 6 present. None present on behalf of private respondents No. 8, 10, 11 & 12.

Written reply on behalf of official respondents No. 1 to 5 submitted, which is placed on file and copy of the same handed over to learned counsel for the appellant.

Previous date was changed on Reader Note, therefore, private respondents No. 8, 10, 11 & 12 be summoned through registered A.D for attendance and to come up for arguments before the D.B at Camp Court D.I.Khan on 27.07.2022.

Appellant shall submit registered A.D alongwith Envelopes within 03 days.



(Rozina Rehman)
Member (J)
Camp Court D.I.Khan



(Salah-ud-Din)
Member (J)
Camp Court D.I.Khan

27.07.2022

Due to summer vacations, the case is adjourned to 29.09.2022 for the same as before.

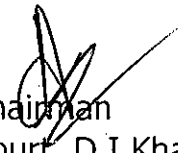

Reader

SA2081/2019

16.12.2021

Appellant with counsel, Mr. Noor Zaman Khattak, District Attorney alongwith Abdul Haleem, Superintendent for the respondents No. 1 to 6 present. Counsel for private respondent No. 8 and private respondent No. 10 in person present.

Written reply on behalf of respondent No. 8 has been submitted. Placed on file. Respondent No. 10 failed to submit reply, hence his right for submission of written reply is waived off. The respondents were afforded with last chance for submission of written reply/comments subject to prior payment of cost of Rs. 5000/- to the appellant but they even today have not submitted the reply and seek adjournment. The cost imposed on previous date has been paid by the representative of official respondents No. 1 to 6 to the appellant. Receipt obtained from the appellant is placed on file. Let the respondents No. 1 to 6 be afforded with another last chance with the warning that in case they fail to submit the written reply/comments on or before next date, their right for reply shall be deemed as struck off by virtue of this order. Case to come up for arguments on 25.01.2022 before the D.B at camp court, D.I.Khan.


Chairman
Camp Court, D.I.Khan

23.11.2021

Counsel for the appellant and Mr. Muhammad Rasheed, DDA alongwith Abdul Haleem, superintendent for respondents No. 1 to 4 and private respondents No. 8 and 10 in person present. Counsel for private respondents No. 11 & 12 present. None present on behalf of respondents No. 5 & 6. Fresh notices be issued to them by way of last chance.

Written reply on behalf of the respondent No. 11 & 12 received through office alongwith Wakalatnama of Mr. Yousaf Khan Advocate, which are placed on file. Written reply/comments of the respondents No. 1 to 6, 8 and 10 are still awaited. Last opportunity is granted to them for submission of written reply/comments on 25.01.2022 before S.B at camp court, D.I.Khan.

In case the last chance as given above is not availed, the next adjournment shall be subject to prior payment of cost of Rs. 5000/- to the appellant failing which the case shall be fixed before D.B for arguments without reply/comments deeming the same as waived off by the said respondents.



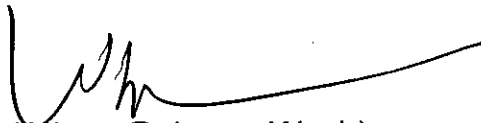
Chairman
Camp Court, D.I.Khan

25.10.2021

Appellant present through counsel.

Asif Masood Ali Shah learned Deputy District Attorney alongwith Abdul Haleem Superintendent for official respondents present. Counsel for private respondents 7 to 12 present.

Reply on behalf of respondents No.1 to 12 was not submitted. Request for adjournment was made on behalf of official respondents as well as private for submission of reply/comments; granted by way of last chance with direction to submit the same within 10 days in office, positively. To come up for arguments on 23.11.2021 before D.B at Camp Court, D.I.Khan.



(Atiq ur Rehman Wazir)
Member(E)
Camp Court, D.I.Khan



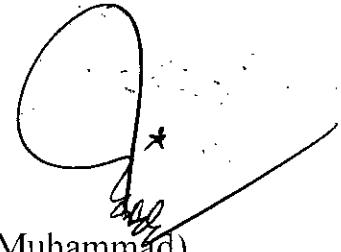
(Rozina Rehman)
Member(J)
Camp Court, D.I.Khan

25.03.2021

Appellant in person present. Mr. Muhammad Rashid, DDA alongwith Mr. Abdul Haleem, Supdt for respondents No. 1 to 6, private respondent No. 8,10,11, and 12 in person present. None for private respondents No 7,9 and 13 to 36, hence proceeded against ex-parte. Mr. Rutam Khan Kundi, Advocate submitted Wakalat Nama in favor of private respondent No. 10. Mr. Waqar Alam, Advocate submitted Wakalat Nama on behalf of private respondent No.8.

Written reply not submitted. Representative of the official respondents No. 1 to 6 as well as private respondents seeks time to submit written reply/comments on the next data.

Adjourned to 21.06.2021 before S.B at camp court D.I.Khan.



(Mian Muhammad)
Member(E)
Camp Court D.I.Khan

21-6-21

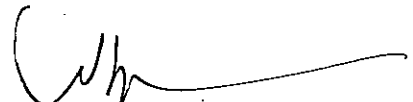
Due to COVID 19, the case is adjourned to 25-10-21 for same.



25.11.2020

Appellant in person and Muhammad Jan, learned DDA alongwith M/S Abdul Haleem Superintendent and Shafqat Superintendent for official respondent and private respondent No. 8, 10, 11 & 25 in person present. No one present on behalf of private respondents No. 7, 9, 12 to 24 & 26 to 36.

Reply/comments on behalf of official respondents as well private respondents not submitted. Representative of official respondents and private respondents No. 8, 10, 11 & 25 are seeking time to submit reply/comments. Notice be issued to private respondents No. 7, 9, 12 to 24 & 26 to 36 through daily newspaper, costs of the said notice shall be borne by appellant. To come up for reply/comments on 27.01.2021 before S.B at Camp Court, D.I.Khan.



(Atiq-Ur-Rehman)

Member (E)

Camp Court, D.I.Khan

27.1.2021

due to COVID-19, the case is adjourned to 25.3.2021 for the same.



26.10.2020

Appellant is present in person. Mr. Muhammad Jan, Deputy District Attorney on behalf of official respondents is also present.

Official respondents are seeking time for submission of written reply/comments. Time granted. Service of rest of private respondents No. 7 to 36 has not been procured as no notice/process could be issued to them due to non deposit of requisite fee. Appellant is directed to deposit the requisite fee and their service has to be effected by means of registered envelope for 25.11.2020 before S.B at Camp Court, D.I.Khan.

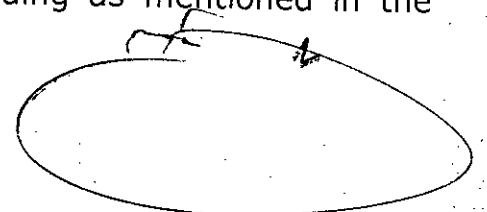


(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT D.I.KHAN

27.10.2020

The appeal was fixed for written reply to be submitted by respondents on 25.11.2020 but the appellant submitted application for correction of addresses of private respondents namely Amjad Naeem who stand as private respondent No. 8, Ijaz Khan who stand as private respondent No. 10, Tufail Muhammad who stand as private respondent No. 11 and Sheikh Allah Nawaz who stand as private respondent No. 12.

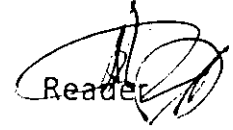
The appeal was requisitioned for today and the application is placed on record. Moharrar is directed to issue notice to private respondents as per application submitted by appellant today. File to come up for proceeding as mentioned in the earlier order dated 26.10.2020.



(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT D.I.KHAN

20.4 .2020

Due to COVID19, the case is adjourned to
21/9 /2020 for the same as before.

Reader 

21.09.2020

Nemo for appellant.

Mr. Usman Ghani learned District Attorney alongwith Mukhtiar Ali Assistant Secretary and Abdul Halim Superintendent for official respondents No.1 to 6 present.

Reply on behalf of respondents was not submitted. Representatives of respondents No. 1 to 6 request for time to furnish reply; granted. Notice be issued to appellant and private respondents No.7 to 36 for reply/comments for 26.10.2020 before S.B at Camp Court, D.I.Khan.



(Rozina Rehman)
Member (J)
Camp Court, D.I Khan

26.02.2020

Counsel for the appellant Muhammad Saeed Ahmad Qureshi present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was serving in Revenue Department as Political Muharrar. It was further contended that final seniority list of Political Muharrars/Junior Clerks of Deputy Commissioner South Waziristan Tribal District/Tribal Sub Divisions D.I.Khan and Tank on 17.05.2019 was prepared by the respondent-department wherein the appellant has been shown at column of date of entry in the government service as 23.10.1996 and has been placed at serial no. 31. It was further contended that Junaid Alam Junior Clerk is placed at serial No. 6 in the said seniority list but his date of entry into government service has been mentioned as 18.09.1999, therefore, it was contended that the department was required to place the name of the appellant at serial No. 6 instead of serial No. 31. It was further contended that feeling aggrieved from the said seniority list, the appellant filed departmental appeal on 21.08.2019 but the same was not responded. It was further contended that as per column of date of entry into government service, the appellant is senior from the private respondents; therefore, the respondent-department is bound to rectify the seniority list.

The contentions raised by learned counsel for the appellant need consideration. The appeal is admitted for 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 the respondents for written reply/comments for 20.04.2020 before S.B at Camp Court D.I.Khan.

Appellant Deposited
Security & Process Fee
02/3/20


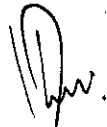

MA
(M. Amin Khan Kundi)
Member
Camp Court D.I.Khan

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 2079/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/12/2019	<p>The appeal of Mr. Muhammad Saeed Qureshi presented today by Mr. Muhammad Abdullah Baloch Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to touring S. Bēnchi at D.I.Khan for preliminary hearing to be put up there on <u>29-1-2020</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>29.01.2020</p> <p>Appellant in person present and requested for adjournment on the ground that learned counsel for the appellant is not available today due to general strike of Khyber Pakhtunkhwa Bar Council. Adjourned to 26.02.2020 for preliminary hearing before S.B at Camp Court D.I.Khan.</p> <p style="text-align: right;"> (M. Amin Khan Kundi) Member Camp Court D.I.Khan</p>

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL CAMP COURT DERA ISMAIL KHAN**

Service Appeal No. **2081** 2019

Muhammad Saeed Ahmad Qureshi

VERSUS

Govt. of KPK and others

SERVICE APPEAL

INDEX

S.No	Particulars of the Documents	Annexure	Page
1.	Grounds of Service Appeal and stay application and affidavits	--	1-11
2.	Copy of appointment order of appellant	A	12
3.	Copy of order dated 27/06/1998	B	13
4.	Copy of order dated 27/10/2007	C	14
5.	Copy of order dated 21/11/2007	D	15
6.	Copy of letter dated 14/05/2011	E	16
7.	Copy of office order dated 10/06/2011	F	17
8.	Copy of office order dated 04/07/2011	G	18
9.	Copy of impugned office order dated 22/07/2019 and the impugned seniority list	H	19-22
10.	Copy of departmental appeal	I	23-24
11.	Wakalatnama in favor of M. Abdullah Baloch AHC/M. Abid AHC	--	

Date: 20/12/2019

Yours Humble Appellant



Muhammad Saeed Ahmad Qureshi

Through Counsel,



(1)

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL CAMP COURT DERA ISMAIL KHAN**

Service Appeal No. _____/2019

Muhammad Saeed Ahmad Qureshi son of Fazal-ur-Rahman r/o Mohallah Fatehullah Badshah, Dera Ismail Khan city. Presently working as Junior Clerk/Political Moharir Tribal Sub-Division Dera Ismail Khan (DOA: 22/10/1996).

..... **Appellant**

Versus

1. The Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Peshawar.
2. The Senior Member Board of Revenue & Estate Department, Khyber Pakhtunkhwa Peshawar.
3. The Commissioner Dera Ismail Khan.
4. The Deputy Commissioner, Dera Ismail Khan.
5. The Deputy Commissioner, South Waziristan.
6. The Assistant Commissioner, South Waziristan.


..... **Official respondents**

7. **Attaullah Mehsood** Junior Clerk presently working at DC office South Waziristan Tribal District.
8. **Amjad Naeem** son of Muhammad Yaqoob caste Khiyara r/o Basti Kanchkianwali, Dera Ismail Khan. Presently working as Naib Tehsildar (OPS) Tehsil Sararogha, District South Waziristan.
9. **Khalilullah** son of Imam Bakhsh Presently Working in the Office of Deputy Commissioner Dera Ismail Khan against the post of HVC.
10. **Ijaz Khan**, presently working, as Naib Tehsildar (OPS) Tehsil Shakai, District South Waziristan.



2

11. Tufail Muhammad Junior Clerk presently working at DC office South Waziristan Tribal District.
12. Sheikh Allah Nawaz Junior Clerk presently working at DC office South Waziristan Tribal District.
13. Junaid Ahmad Junior Clerk presently working at DC office South Waziristan Tribal District.
14. Waris Khan Junior Clerk presently working at DC office South Waziristan Tribal District.
15. Rehmatullah Marwat Junior Clerk presently working at DC office South Waziristan Tribal District.
16. Noor Sahib Junior Clerk presently working at DC office South Waziristan Tribal District.
17. Illaudin Karmaz khel wazir Junior Clerk presently working at DC office South Waziristan Tribal District.
18. Rehman Zada Junior Clerk presently working at DC office South Waziristan Tribal District.
19. Amirullah Khan Junior Clerk presently working at DC office South Waziristan Tribal District.
20. Muzammil Khan Junior Clerk presently working at DC office South Waziristan Tribal District.
21. Tehssen Khan Junior Clerk presently working at DC office South Waziristan Tribal District.
22. Farmanullah Junior Clerk presently working at DC office South Waziristan Tribal District.
23. Sarwar Khan Junior Clerk presently working at DC office Tribal Sub-Division Tank.
24. Mateeullah Khan Junior Clerk presently working at DC office South Waziristan Tribal District.
25. Rehmatullah Bittani Junior Clerk presently working at DC office South Waziristan Tribal District.



(3)

26. Meraj Din Junior Clerk presently working at DC office South Wazirstan Tribal District.
27. Ahmad Saleem Junior Clerk presently working at DC office South Wazirstan Tribal District.
28. Zahid Khan Junior Clerk presently working at DC office South Wazirstan Tribal District.
29. Samiullah said Junior Clerk presently working at DC office South Wazirstan Tribal District.
30. Muhammad Ali Junior Clerk presently working at DC office South Wazirstan Tribal District.
31. Muhammad Imran Junior Clerk presently working at DC office South Wazirstan Tribal District.
32. Atiq ur Rehman Junior Clerk presently working at DC office South Wazirstan Tribal District.
33. Khan Shah Junior Clerk presently working at DC office South Wazirstan Tribal District.
34. Zafar Ali Junior Clerk presently working at DC office South Wazirstan Tribal District.
35. Ijaz Khan son of Malik Ranjhu Presently Working as Naib Tehsildar (OPS) Tehsil Shakai, District South Waziristan (DOA: 01/04/1992).
36. Khalilullah son of Imam Bakhsh Presently Working in the Office of Deputy Commissioner Dera Ismail Khan as HVC (DOA: 07/12/1982).

.....Private Respondents

APPEAL UNDER SECTION 4 OF THE KPK SERVICES TRIBUNAL ACT, 1974, AGAINST THE IMPUGNED OFFICE ORDER #4276/Estt DATED 22/07/2019 ALONGWITH IMPUEDGNE SENIORITY LIST OF PLITICAL MOHARRIRS/JUNIOR CLERKS OF DEPUTY COMMISSIONERS, SOUTH WAZIRSTAN TRIBAL DISTRICTS/TRIBAL SUB DEVISION D I KHAN & TANK AS IT



STOOD ON 30/06/2019. ISSUED BY RESPONDENT NO. 3 WHEREBY APPELLANT WAS SHOWN AS JUNIOR IN THE IMPUGNED SENIORITY LIST AND JUNIOR MOST EMPLOYEES OF THE DEPARTMENT WERE GRANTED SENIORITY which is against THE SERVICE RULES & REGULATIONS AS WELL AS SETTLED PRINCIPAL OF NATURAL JUSTICE AND EQUITY.

PRAYER

On acceptance of this appeal the impugned office order No. 4276 dated 22/07/2019 may kindly be set aside and the impugned seniority list issued by respondent No.3 may please be rectified/corrected according to actual seniority position of the Political Moharirs/Junior Clerks.

Note: That the addresses of the Parties given in the heading of the Petition are true and correct for the purpose of service.

Respectfully Sheweth:-

The Appellant most respectfully submits as under:-

BRIEF FACTS:

1. That the appellant was initially appointed as Junior Clerk on 22/10/1996 in the office of respondent#3 and since then the appellant has been serving the department with great zeal and zest and to the entire satisfaction of their superiors. Copy of the appointment order is annexed as **Annexure-A.**
2. That it is pertinent to mention here that before the devolution two sub-offices were working in the offices of Commissioners to control the settled as well as the FR/FATA areas of the province.
3. That the appellant was posted as Junior clerk at FATA Wing vide order No. 7039-43/Acctt: dated 27/06/1998. Copy of order dated 27/06/1998 is annexed as **Annexure-B.**



4. That since 27/06/1998 till the "Devolution" the appellant had served the department as Junior Clerk in FATA Wing.
5. That the appellant, since 27/06/1998, has been receiving his salaries from the Head of FATA Wing.
6. That at the time of "Devolution" the name of the appellant, along with other staff, was inadvertently shown in the list of Surplus Pool employees but the then Assistant Political Agent F.R Dera Ismail Khan vide order No. 2182 dated 27/10/2007 requested to the then DCO Dera Ismail Khan to delete the name appellant along with seven other employees from the list of Surplus Pool employees with the ground that the said employees have been receiving their salaries from the regular Head of Account of F.R Dera Ismail Khan. Copy of order dated 27/10//2007 is annexed as **Annexure-C**.
7. That in response to the office order dated 27/10/2007, the then DCO Dera Ismail Khan deleted the name of appellant along with seven officials from the list of Surplus Pool employees vide order No. 3656 dated 21/11/2007. Copy of the order dated 21/11/2007 is annexed as **Annexure-D**.
8. That after re-functioning of the office of Commissioner Dera Ismail Khan, the appellant, on the basis of seniority, applied to the office of Commissioner Dera Ismail Khan through proper channel for his promotion as Assistant. The same request/application of the appellant was duly proceeded to the Board of Revenue Khyber Pakhtunkhwa. Later on the Assistant Secretary Establishment, Board of Revenue, KPK directed the DCO Dera Ismail Khan to submit his report regarding the service record of the appellant vide letter No. Estt:-II/DIKhan/16341 dated 14/05/2011. Copy of the letter dated 14/05/2011 is annexed as **Annexure-E**.
9. That upon the directions of Board of Revenue KPK, the DCO Dera Ismail Khan submitted the detail report regarding service record of appellant vide office order No.3813/DCO/HRDO dated 10/06/2011. Copy of the office order dated 10/06/2011 is annexed as **Annexure-F**.



(6)

10. That on the basis of aforementioned detail report of service record of the appellant the Board of Revenue KPK issued an office order No. Estt:-II/CMR/D.I.Khan/20909 dated 04/07/2011 with the following remarks,

"I am direct to refer to your letter No. 3813/DCO (HRDO) dated 10/06/2011, on the subject noted above and to say that the official concerned is drawing salary from the office of APA (F.R) D.I.Khan and stands adjusted in the office of APA (FR) D.I.Khan, under the policy of Provincial Government, cannot be re-adjusted in any other office."

Copy of the office order No. Estt:-II/CMR/D.I.Khan/20909 dated 04/07/2011 is annexed as **Annexure-G**.

11. That on 22/07/2019, the office of the Commissioner Dera Ismail Khan Division D.I.Khan, issued the impugned final seniority list the Political Moharirs/Junior Clerks in which the name of appellant is placed at serial No. 31 despite the fact that the appellant is senior most employee than the private respondents. Hence, the impugned final seniority list dated 22/07/2019 is against law, fact and service rules. Hence, the impugned seniority is liable to be rectified/corrected according actual seniority position of the Political Moharirs/Junior Clerks. Copy of impugned office order dated 22/07/2019 and final seniority list are jointly annexed as **Annexure-H**.

12. That the appellant, feeling aggrieved by the impugned final seniority list, preferred a departmental appeal/representation dated 21/08/2019 to the Board of Revenue KPK being appellate authority and the same is not decided as yet. Copy of the departmental appeal is annexed as **Annexure-I**.

13. That the appellant is having no other remedy but to knock the doors of this Honourable Tribunal by invoking the jurisdiction under section 4 of Khyber Pakhtunkhwa Service Tribunal Act-1974, inter alia, on the following grounds,



GROUND

- a) That the impugned office order dated 22/07/2019 as well as the impugned seniority list issued by the respondent#3 is against the facts, in excess of powers, without lawful authority and against the settled norms of rules and regulations, hence, the same is liable to be rectified/corrected.
- b) That the appellant had been serving the department since 1996 and always performed his duties with great zeal and zest, hence, is entitled to be promoted as per his seniority position but the respondents are intending to deprive the appellant from his valuable rights at this stage by disturbing the seniority position of the appellant through impugned final seniority list of Political Moharirs/Junior Clerks, hence, the same is liable to be corrected according to service rules.
- c) That the official respondents, with Mala fide intention and by wrongly interpreting the benefit of seniority, are intending to award the seniority to their blue eyed persons which is against the civil servants seniority Rules 1993, hence, on this sole ground the appeal of the appellant is liable to be accepted.
- d) That the impugned seniority list is liable to be declared as illegal, void ab initio, without jurisdiction and is in violation of service laws. Moreover, in the impugned seniority list at the last column of remarks the para does not show any service break or change of cadre of the appellant but the appellant has wrongly been placed at serial No. 31 whereas keeping in view service laws and judgments of apex courts the seniority of civil servant be counted from his initial date of appointment. Thus the proper and correct place of the appellant is at serial No. 6 of the impugned seniority list.
- e) That appointment of appellant was made in the Commissioner Officer Dera Ismail Khan and since then the salaries of the appellant has been withdrawn of Head of APA Office Dera Ismail Khan.



- f) That the official respondents are bent upon promoting their blue eyed employees although the appellant is most senior employee in the department than the private respondents. Hence, the impugned seniority list is liable to be corrected.
- g) That counsel for the appellant may graciously be allowed to raise additional grounds at the time of arguments.

It is, therefore, humbly prayed that on acceptance of the instant service appeal the impugned office order #4192-96/Estt: dated 18/07/2019 along with subsequent impugned order No. 4276 dated 22/07/2019 may kindly be set aside and the impugned seniority list issued by respondent No.3 may please be rectified/corrected according to actual seniority position of the Political Moharirs/Junior Clerks and the appellant may kindly be promoted as Naib Tehsildar in accordance with his seniority position.

Date: 20/12/2019

Yours Humble Appellant



Muhammad Saeed Ahmad Qureshi

Through Counsel,



Muhammad Abdullah Baloch
Advocate High Court

M. Abid AHC

9

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL CAMP COURT DERA ISMAIL KHAN**

Service Appeal No. _____/2019

Muhammad Saeed Ahmad Qureshi

VERSUS

Govt. of KPK and others

SERVICE APPEAL

AFFIDAVIT

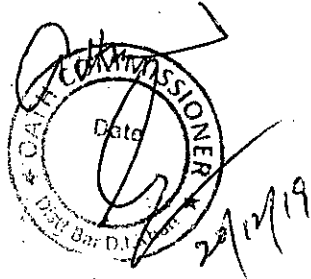
I, **Muhammad Saeed Ahmad Qureshi** son of Fazal-ur-Rahman r/o Mohallah Fatehullah Badshah, Dera Ismail Khan city. Presently working as Political Moharir/Junior Clerk Tribal Sub-Division Dera Ismail Khan, do hereby solemnly affirm and declare on oath that contents of above Service Appeal are true & correct to the best of my knowledge and that nothing has been concealed from this Honourable Court.

Dated: 20/12/2019



DEPONENT

12101-2021373-7



(10)

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL CAMP COURT DERA ISMAIL KHAN**

Service Appeal No. _____/2019

Muhammad Saeed Ahmad Qureshi

VERSUS

Govt. of KPK and others

SERVICE APPEAL

**APPLICATION FOR INTERIM RELIEF REGARDING DIRECTION
TO OFFICIAL RESPONDENTS TO NOT TAKE ANY ADVERSE
ACTION AGAINST THE APPELLANT. THE RESPONDENTS MAY
FURTHER BE RESTRAINED TO CONTINUE THE PROMOTION
PROCESS/TRAINING OF PRIVATE RESPONDENTS TILL FINAL
DISPOSAL OF THE INSTANT SERVICE APPEAL.**

Respectfully Sheweth;

The appellant humbly submit as under;

1. That the above titled service appeal is being filed before this honourable court and contents of the instant application may please be considered as integral part of main service appeal.
2. That that the appellant have prima facie case and balance of convenience also tilts in favour of appellant.
3. That the respondents are intending to deprive the appellant from his valuable rights and if the application of the appellant is not accepted then the appellant will suffer irreparable loss and purpose of institution of instant service appeal will become futile.
4. That this honourable court has got vast and ample powers to entertain the application in hand.

It is therefore, humbly prayed that the instant application may kindly be accepted.

Date: 20 /12/2019



Yours Humble Appellant

Through Counsel,



11

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL CAMP COURT DERA ISMAIL KHAN**

Service Appeal No. _____/2019

Muhammad Saeed Ahmad Qureshi

VERSUS

Govt. of KPK and others

SERVICE APPEAL

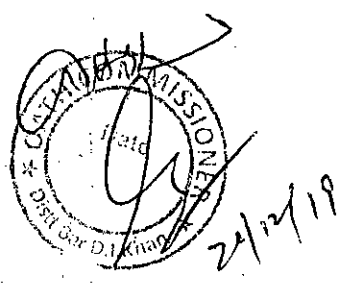
AFFIDAVIT

I, **Muhammad Saeed Ahmad Qureshi** son of Fazal-ur-Rahman r/o Mohallah Fatehullah Badshah, Dera Ismail Khan city. Presently working as Political Moharir/Junior Clerk Tribal Sub-Division Dera Ismail Khan, do hereby solemnly affirm and declare on oath that contents of above Service Appeal are true & correct to the best of my knowledge and that nothing has been concealed from this Honourable Court.



DEPONENT

12101-2021373-7



Amended PA

OFFICE OF THE COMMISSIONER, DIRHAN DIVISION

NO 9715 /Acctt

Dated DIRhan the 22/10/1952

CARDIER

In exercise of the powers conferred under rule (3)(b-1) of the MSP, Civil Servants (Appointment, Promotion and Transfer) Rules, 1959, and in accordance with the recommendations of Departmental Selection Committee of the office of Commissioner, D.I.Khan, the following four candidates are appointed as Junior Clerk (BPS-5) plus special allowances admissible under the rules against the clear vacancies with immediate effect :-

- 1. Mohammad Jehangir s/o Allah Bok.
- 2. Saeed Ahmad s/o Fazalur Rehman.
- 3. Shaukat Jehan s/o Shah Jehan.
- 4. Muhammad Baran s/o Said Husain.

They shall remain on probation for a period of two years.

Their appointment is subject to following conditions:-

- 1. They shall produce Medical Fitness Certificate from the Medical Superintendent, District headquarter Hospital D.I.Khan on the date of their joining duty.
- 2. Their character and antecedents are to be verified by the local administration on the prescribed form to be obtained from this office.
- 3. Their services can be terminated at one month's Notice or one month's salary in lieu thereof without assigning any reasons.
- 4. In case they wish to resign from service at any time, a month's notice will be necessary or in lieu thereof one month's salary may be forfeited.
- 5. They will be governed by such rules and orders relating to pay, leave, P.A., Medical Attendance, etc, as may be issued by the Govt. from time to time for the category of Govt. Servants to which they belong.

COMMISSIONER
DIRHAN DIVISION

sent to 9716-25 /Acctt

Copies to:-

- 1. Candidates concerned.
- 2. Personal files.
- 3. Office Orders file.
- 4. Bull. Clerk.

COMMISSIONER
DIRHAN DIVISION

[Handwritten signature]

(13)

P-9
Annex 'B'

OFFICE OF THE COMMISSIONER, D.I. KHAN DIVISION, D.I. KHAN.

No. _____ / Accts:

Dated D.I. Khan, the 27/6/1998.

OFFICE ORDER:

The following Junior Clerks of Commissioner's office should change their seats with immediate effect as under :-

- | | | |
|----|---|-------------------------------------|
| 1. | Mr. Saad Ahmad Qureshi
Junior Clerk. | Record Keeper
Development Branch |
| 2. | Mr. Naeem Khan
Junior Clerk. | Record Keeper
General Branch. |

S. J. Khan

For Commissioner,
D.I. Khan Division, D.I. Khan.

No. 7039-43 / Accts:

Copy to :-

1. The Secretary to Commissioner, D.I. Khan Division, D.I. Khan
2. The Assistant to Commissioner (Dev) D.I. Khan Division D.I. Khan.
3. Officials concerned.
4. Office order file.
5. D.I. Khan Clerk (2 copies).

S. J. Khan
For Commissioner,
D.I. Khan Division, D.I. Khan.

No. 2182 / APA(FR). Dated DIKhan, the 27/10/07

From: The Asstt: Political Agent,
FR DIKhan.

Annex 'C'

To: The Asstt: Coordination Officer,
DIKhan.

Subject:-- Deletion of officials from Distt: Surplus
Pool and repatriation to APA Office FR DIKhan.

Memo:

Reference this office Memoranda No. 2114/ APA(FR) dated 22.10.2007 and No. 2138/ APA(FR) dated 23.10.2007 on the subject noted above.

2: In line with decision taken in the meeting held in your office on 27.10.2007, the following officials have erroneously been shown in the Distt: Surplus Pool, whereas they are getting their salaries from regular Head of Account of APA FR DIKhan:-

- 1- Mr. Saeed Ahmad Qureshi, Junior Clerk.
- 2- Mr. Muhammad Rizwan, Junior Clerk.
- 3- Mr. Muhammad Aslam, Daftri.
- 4- Mr. Muhammad Saeed, Naib Qasid.
- 5- Mr. Muhammad Khalid, Naib Qasid.
- 6- Mr. Saifur Rehman, Behishti.
- 7- Mr. Muhammad Sohail, Mali.
- 8- Mr. Ghulam Farid, Driver.

3: You are, therefore, requested to delete the names of above officials from the list of Distt: Surplus Pool and they may be directed to report for duty in this office as per decision arrived at in the aforesaid meeting. It is added that Mr. Ghulam Farid Driver is already working in this office.

ASSTT: POLITICAL AGENT
FR DIKHAN.

Endst. No. 2183 / APA(FR).

Copy to Distt: Coordination Officer DIKhan for information please.

ASSTT: POLITICAL AGENT
FR DIKHAN.

(15)

DISTRICT GOVERNMENT
DERA ISMAIL KHAN

Annex 'D'

No. 3656 /DCO (SP) XV: Dated D.I.Khan 21/11/2007

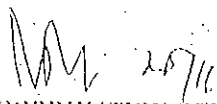
To

1	Saeed Ahmad	Junior Clerk	Ex-Commissioner's Office, D.I.Khan
2	Muhammad-Rizwan	Junior Clerk	-do-
3	Muhammad Aslam	Daffri	-do-
4	Muhammad Saeed	Naib Qasid	-do-
5	Muhammad Khalid	Naib Qasid	-do-
6	Saif ur Rehman	Bashishti	-do-
7	Muhammad Sohail	Mali	-do-
8	Gulam Farid	Driver	-do-

Subject: DELETION OF OFFICIALS FROM DISTRICT SURPLUS POOL
AND REPATRIATION TO APA, OFFICE FR D.I.Khan


It has been intimated by the APA, FR, D.I.Khan, that your names have erroneously been shown in the District Surplus Pool, whereas you are getting the salaries from regular head of Account of his Office and therefore, requested this Office for deletion of your names from the list of District Surplus Pool, D.I.Khan.

In view of above, you are directed to report for duty to the APA, FR, D.I.Khan, immediately.


DISTRICT COORDINATION OFFICER
DERA ISMAIL KHAN

Endst.No.& Date Even

Copy to :- The Assistant Political Agent, FR, D.I.Khan, w/r to his letter No.2182-83/APA (FR) dated 27.10.2007, for information.


DISTRICT COORDINATION OFFICER
DERA ISMAIL KHAN

16

~~16-11-11~~
Annex E 4

GOVERNMENT OF KHYBER PAKHTUNKHWA
BOARD OF REVENUE
REVENUE & ESTATE DEPARTMENT

No. Estt: -II/DIKhan : 16341
Peshawar dated the 14/05/2011

To

The District Coordination Officer,
DIKhan.

SUBJECT: APPLICATION FOR PROMOTION TO THE POST OF ASSISTANT IN
THE OFFICE OF COMMISSIONER DIKHAJAN DIVISION.

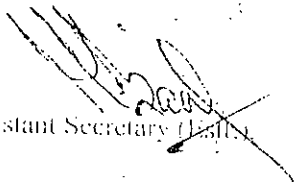
Sir,

I am directed to refer to this Department letter No. Estt:II/CMR/DIK/16341 dated 27.01.2011 and to state that the requisite report is still awaited from your end after lapse of 3 months.


I am further directed by the Competent Authority to request you to furnish the requisite report within three days positively without fail.

Copy

No. Estt: -II/DIKhan


Assistant Secretary (Dist.)

Copy forwarded to Commissioner DIKhan Division DIKhan for information


Assistant Secretary (Estt.)

(17)

~~Annex F~~
Annex F

OFFICE OF THE DISTRICT COORDINATION OFFICER DERA ISMAIL KHAN.

No. 3813 /DCO(HRDO) Dated DIKhan the 10 /06/2011

To

The Assistant Secretary (Esstt),
Board of Revenue KPK,
Peshawar.

Subject;

APPLICATION FOR PROMOTION TO THE POST OF
ASSISTANT IN THE OFFICE OF COMMISSIONER DIKHAN
DIVISION

Memo:

Reference your letter No: Estt-II/DIKhan/16341 dated 14/05/2011

6/10/11

Mr Saeed Ahmad Qureshi was initially recruited as Junior Clerk in BPS 5 in Commissioner Office DIKhan on 23/10/1996. He remained as Junior Clerk till devolution in 2001 wherein he was awarded selection grade BPS-07 through DPC meeting held on 2001 in the office of Commissioner DIKhan. All the staff working in the office of Divisional Commissioner at the time of abolition of Commissioner Offices were declared surplus and the name of official was included in the surplus pool list. But unfortunately on the intervention of APA, FR DIKhan on 27/10/2007 (copy enclosed), the then DCO DIKhan unadjustedly posted him in APA, FR for the purpose of duty on 24/11/2007 (copy enclosed). Later on he was taken as adjusted in APA, FR DIKhan and his name was deleted from the list of surplus pool staff. Uptill now he is serving in the office of APA, FR DIKhan and is not included in the seniority list of Board of Revenue (DOR & F & P, DCO). Consequently he submitted an application to the Commissioner office DIKhan which was sent to your office for guidance.

This office is of the view that the official may be adjusted in his parent office and in order to save his seniority as he deserve.


DISTRICT COORDINATION OFFICER
DIKHAN

Endst No & date even:

Copy forwarded to:-

1. Commissioner DIKhan Division DIKhan for information w/r to his letter No: 2736/ Acctt dated 28/5/2011.
2. APA, FR DIKhan w/r to his letter No: 16341 dated 14/5/2011.


DISTRICT COORDINATION OFFICER
DIKHAN

18

Annex-6

GOVERNMENT OF KHYBER PAKHTUNKHWA
BOARD OF REVENUE
REVENUE & ESTATE DEPARTMENT

No. Estt:II/CMR/DIKHAN 20909

Peshawar dated the 24/07/2011

To

The District Coordination Officer,
D.I.Khan.

Subject: Application for promotion to the post of Assistant in the office of
Commissioner, DIKhan Division.

I am directed to refer to your letter No. 3813/DCO (FRDO), dated 10.06.2011, on the subject noted above and to say that the official concerned is drawing salary from the office of APA (FR), DIKhan and stands adjusted in the office of APA (FR) DIKhan under the Policy of Provincial Government, he can not be re-adjusted in any other office.

Assistant Secretary (Estt)

19

Annex "H"

OFFICE OF THE
COMMISSIONER
DIKHAN DIVISION DIKHAN
Phone # 0966-9280351
Fax No. 0966-9280352
Commissionerdikhan@yahoo.com
Secretary dikhancommissioner@gmail.com

No. 4276 /Estt:

Dated DIKhan the 22-7-2019

To

The Assistant Secretary (Estt)
Board of Revenue, Govt. of Khyber Pakhtunkhwa
Revenue & Estate Department,
Peshawar.

Subject: - FINAL SENIORITY LIST OF POLITICAL MOHARRIRS / JUNIOR CLERK OF DEPUTY COMMISSIONERS SOUTH WAZIRISTAN TRIBAL DISTRICT, DIKHAN & TANK AS STOOD ON 30.06.2019

In supersession of this office letter No.901-3/Estt (Seniority List) dated 01.03.2019 and in continuation of this office letter No.3923-25/Estt dated 5.7.2019 and letter No.4192-96/Estt dated 18.7.2019 as well as Khyber Pakhtunkhwa Board of Revenue letter No. Estt V/PF/Amjad Naem/DIK/24405 dated 16.07.2019 I am directed to enclose herewith a copy of Final Joint Seniority list of Political Moharrirs / Junior Clerks in DIKhan Division as it stood on 30.6.2019 duly finalized in the light of above-mentioned letter of Board of Revenue as well as Service Books of the incumbents is hereby circulated.

Endst: No & Date Even

Copy to the:-

1. Deputy Commissioner, DIKhan.
2. Deputy Commissioner, Tank
3. Deputy Commissioner SWTI.
4. PS to Commissioner DIKhan Division

[Signature]
Secretary to Commissioner
DIKhan Division DIKhan

[Signature]
Secretary to Commissioner
DIKhan Division DIKhan

**Final Seniority List of Political Moharrirs / Junior Clerksof Deputy Commissioners, South Waziristan Tribal District / Tribal Sub Divisions DIKhan & Tank
as it stood on 30.06.2019**

S.#	Name of Official	Qualification	Name of Office	Date of Birth	Date of Entry into Govt. Service	Regular Appointment / Promotion to the present Post			Remarks
						Date	BPS	Method of Recruitment	
1	Attaullah Mehsud J/C	F.A	DC SWTD	20/03/1963	29/01/1995	29/01/1995	11	Direct	
2	Ihsanullah Khan J/C	M.A	DC SWTD	02/03/1968	29/01/1995	29/01/1995	11	Direct	
3	Saifullah Jan J/C	F.A	DC TSD Tank	16/01/1969	05/08/1992	01/12/2001	11	Direct	Service Book is signed by the APA (FR) Tank from 01/12/2001 and prior to 01/12/2001 his service book is signed by the Deputy Commissioner Tank
4	Tufail Muhammad J/C	Matric	DC SWTD	03/04/1969	26/08/1990	29/08/2002	11	Promotee	
5	Sheikh Allah Nawaz J/C	F.A	DC SWTD	05/02/1978	01/02/1996	05/08/2003	11	Promotee	
6	Junaid Alam J/C	Matric	DC SWTD	18/02/1982	18/09/1999	05/08/2003	11	Promotee	
7	Khalitullah J/C	Matric	DCTSD DIKhan	14/03/1962	07/12/1982	01/09/2001	11	Direct	The official was appointed in DC Office DIKhan on 07.12.1982 and Service Book was signed by the DC DIKhan and adjusted in DOR office vide DOR No. 9302-04/EC dated 03.09.2001 and Service book signed the DOR DIKhan upto 01.12.2003. Later on service book is signed by the APA DIKhan without any transfer/ adjustment order entry.
8	Waris Khan J/C	F.A	DC TSD Tank	08/01/1973	06/10/1992	29.04.2004	11	Direct	Service Book is signed by the APA (FR) Tank from 01/12/2001 and prior to 01/12/2001 his service book is signed by the Deputy Commissioner Tank. However actually the official had been transferred from office of DOR Office Tank to the office of APA (FR) Tank vide DCO Tank office Order No. 1701/Acctt dated. 29.04.2004
9	Rehmatullah (Marwat) J/C	B.A	DC TSD Tank	09/07/1972	15/01/1995	06.05.2004	11	Direct	Service Book is signed by the APA (FR) Tank from 01/12/2001 and prior to 01/12/2001 his service book is signed by the Deputy Commissioner Tank. However actually the official had been transferred from office of EDO (F&P) Tank to the office of APA (FR) Tank vide DCO Tank office Order No. 1701/Acctt dated. 06.05.2004
10	Noor Sahib J/C	Matric	DC SWTD	06/08/1961	08/09/2005	06/09/2005	11	Direct	

20

**Final Seniority List of Political Moharrirs / Junior Clerks of Deputy Commissioners, South Waziristan Tribal District / Tribal Sub Divisions DIKhan & Tank
as it stood on 30.06.2019**

S.#	Name of Official	Qualification	Name of Office	Date of Birth	Date of Entry into Govt. Service	Regular Appointment / Promotion to the present Post			Remarks
						Date	BPS	Method of Recruitment	
✓ 11	Ilaudin Karmaz Khel Wazir J/C	Matric	DC SWTD	08/09/1968	08/09/2005	08/09/2005	11	Direct	
✓ 12	Rehman Zada J/C	Matric	DC SWTD	01/01/1974	08/09/2005	08/09/2005	11	Direct	
✓ 13	Amirullah Khan J/C	Matric	DC SWTD	03/01/1975	08/09/2005	08/09/2005	11	Direct	
✓ 14	Muzamil Khan J/C	Matric	DC SWTD	01/07/1980	08/09/2005	08/09/2005	11	Direct	
✓ 15	Tehssen Khan J/C	F.A	DC SWTD	14/04/1983	08/12/2005	08/12/2005	11	Direct	
✓ 16	Farmanullah J/C	Matric	DC SWTD	08/04/2001	20/04/2006	20/04/2006	11	Direct	
✓ 17	Matiullah Khan J/C	F.A	DC SWTD	15/07/1985	22/05/2006	22/05/2006	11	Direct	
✓ 18	Sarwar Khan J/C	B.Sc	DC TSD Tank	09/01/1982	20/10/2006	20/10/2006	11	Direct	
✓ 19	Rehmatullah Bettani J/C	M.A	DC TSD Tank	02/05/1980	26/11/2007	26/11/2007	11	Direct	
✓ 20	Miraj ud Din J/C	F.Sc	DC SWTD	08/04/1980	31/12/2007	31/12/2007	11	Direct	
✓ 21	Ahmad Saleem J/C	F.Sc	DC TSD DIKhan	01/03/1991	08/04/2009	08/04/2009	11	Direct	
✓ 22	Zahid Khan J/C	B.A	DC SWTD	20/04/1989	11/04/2009	11/04/2009	11	Direct	
✓ 23	Samullah Said J/C	Matric	DC SWTD	01/03/1982	17/11/2009	17/11/2009	11	Direct	
✓ 24	Muhammad Ali J/C	Matric	DC SWTD	12/05/1972	02/08/2003	17/05/2010	11	Promotee	
✓ 25	Muhammad Imran J/C	M.A	DC SWTD	08/05/1987	17/09/2010	17/09/2010	11	Direct	
✓ 26	Ijaz Khan J/C	B.A	DC TSD DIKhan	01/01/1967	01/04/1992	29/10/2010	11	Direct	The official was appointed in DC Office DIKhan on 01.04.1992 on devolution of Powers 2001 he remain surplus and service book signed by the DOR DIKhan. Later on he was adjusted in DC Office DIKhan vide order No. 9319/DCO/S-Pool-VI dated. 29.10.2010
✓ 27	Atiq-ur-Rehman J/C	B.A	DC SWTD	03/03/1984	01/07/2011	01/07/2011	11	Direct	
✓ 28	Khan Shah J/C	B.A	DC SWTD	15/03/1993	18/03/2011	14/06/2012	11	Direct	

21

re
B
red
d
red

**Final Seniority List of Political Moharrirs / Junior Clerks of Deputy Commissioners, South Waziristan Tribal District / Tribal Sub Divisions DIKhan & Tank
as it stood on 30.06.2019**

S.#	Name of Official	Qualification	Name of Office	Date of Birth	Date of Entry into Govt. Service	Regular Appointment / Promotion to the present Post			Remarks
						Date	BPS	Method of Recruitment	
29	Zafar Ali J/C	B.A	DC SWTD	01/01/1979	01/04/2013	01/04/2013	11	Direct	
30	Amjad Naeem J/C	F.A	DC TSD DIKhan	24/02/1965	01/10/1988	29/05/2013	11	Direct	The official was appointed in DC Office DIKhan on 01.10.1989 and service book signed by the DC DIKhan. Than he was adjusted as Naib Tehsil Accountant vide DCO Order No. 6195-6208/DCO/SP dated. 26.07.2003 in DGR Office DIKhan. Later on transferred / posted in APA FR Office DIKhan vide DC DIKhan order No. 3358/DC /PA dated. 29.05.2013.
31	Muhammad Saeed Ahmad J/C	B.A	DC TSD DIKhan	15/11/1971	23/10/1996	11.08.2014	11	Direct	Prior to 01/12/2001 his service book is signed by the Commissioner Office DIKhan and after 01/12/2001 the Service Book is signed by the APA FR DIKhan, but he was transferred from APA Office DIKhan to DC Office DIKhan vide order No. 2025/DC dated. 30.04.2013. Later on he was again transferred from DC office to APA Office DIKhan vide order No. 1090-94/BC (R) dated. 11.08.2014.
32	Khalid Mehmood J/C	M.Sc	DC SWTD	10/03/1983	10/06/2016	10/06/2016	11	Direct	
33	Waqas Ahmad J/C	M.A	DC SWTD	01/03/1989	10/06/2016	10/06/2016	11	Direct	
34	Asghar Ali J/C	MBA	DC SWTD	20/04/1991	10/06/2016	10/06/2016	11	Direct	
35	Meraj ud Din No.2. J/C	M.Sc	DC SWTD	05/03/1988	10/06/2016	10/06/2016	11	Direct	
36	Usman Wazir J/C	BSc Honor	DC SWTD	24/08/1990	10/06/2016	10/06/2016	11	Direct	
37	Ghulam Farid J/C	B.Com	DC TSD DIKhan	11/04/1968	30/05/1996	08/02/2018	11	Direct	Transfer from Commissioner Office vide order No. 1088/Acctt dated. 08.02.2018
38	Muhammad Saqlain J/C	B.A	DC TSD DIKhan	02/12/1972	30/05/1996	08/02/2018	11	Direct	Transfer from Commissioner Office vide order No. 1088/Acctt dated. 08.02.2018
39	Muhammad Arsalanullah J/C.	MBA	DC SWTD	09/09/1993	20/11/2018	20/11/2018	9	Direct	

Secretary to Commissioner
DIKhan Division DIKhan

22

ah
e:
wi
3-3

لوردالت جناب سینئر سیکرٹری آف ریونیو خیر پور ڈویژن

Receipt
Page 67
21/08/19

عنوان: سروس اپیل برائے سنبھالی

5311
21-08-19

جناب عالی!

- 1- لیہ کہ بندہ بذریعہ آرڈر نمبر 9715/ACCT: مؤرخہ 22/08/1996 (Page-A) جناب سیکرٹری ہب ڈیپارٹمنٹ کے دفتر میں بحیثیت جونیئر سیکرٹری مقرر ہوا۔
- 2- دفتر ہذا میں "Devolution" سے قبل تمام امور سے بندہ کو سنبھالی اور علاقہ نمبر کے انتظام کو کنٹرول کرنے کیلئے 2 سب دفاتر میں آفس اور فائل آفس کیلئے قائم تھے۔
- 3- بندہ کی آئینی دفتری ہذا کے FATA ونگ میں بڑا اور آرڈر نمبر 7039-43/ACCT: مؤرخہ 27/06/1998 کو پورا (Page-B) سے لیکر "Devolution" تک بندہ ہی پورا پورا ذمہ داری سنبھال کر رہا۔
- 5- مندرجہ بالا آئینی سے لیکر اب تک بندہ اپنی تنخواہ FATA کے پینڈے لیتا چلا آ رہا ہے۔

- 6- دوسرے سٹاف سمیت بندہ کا نام بھی غلطی سے سرپلیس پول ریکسٹ میں ڈال دیا گیا تھا۔ تاہم اے۔ پی۔ اے الیف آرڈر نمبر 2182/APA (FR) مؤرخہ 27/10/2007 (Page-C) کے تحت ونگ-35-او ڈیپارٹمنٹ لیکر نمبر 3456/DEO (SP) XV مؤرخہ 21/11/2007 (Page-D) سے بندہ کا نام دوسرے رٹاف سمیت سرپلیس پول ریکسٹ سے Delete کیا گیا۔
- 7- اس ضمن میں لوردالت آف ریونیو نے بڑا اور لیکر نمبر ESTE-II/CMR/DIKHAN 20909 مؤرخہ 04/07/2011 (Page-E) واضح پراپٹ اس وقت تک سنبھالی میں بحال ہونے کے لیے بندہ نے پروسیجریشن کیلئے Apply کیا اور بڑا اور لیکر نمبر 1634/ESTE-II/DIRHAN مؤرخہ 14/05/2011 (Page-F) کے تحت بندہ سے بندہ کی سروس سے متعلق تفصیلی رپورٹ مانگی گئی اور لوبازاں ڈسٹریکشن اور ڈیپارٹمنٹ لیکر نمبر 3813/DCO (HRDO) مؤرخہ 10/06/2011 (Page-F) کے تحت بندہ کی سروس سے

P.T.O

21-08-19

متعلق بورڈ آف رونیو کو تفصیلی رپورٹ پیش کی گئی۔

8- ان تمام حقائق سے بالا ٹریسٹرو کے سرٹیفیکٹ جاری کردہ بڈاویہ کو سٹیفیکیشن پلینٹ
SOR-I (ERAD) 4-1/30 (Vol-17) مورخہ 20/05/2019 (Page-H) سناری کی تصدیق
باز کھلی واقع ہے۔ لیٹر ایک ہی کپیڈ میں ایک سیٹ سے دوسری سیٹ پر ٹریسٹرو
کی بنیاد پر سناری کو متاثر کرنا خلاف ضابطہ، غیر قانونی اور اعلان کے
لقداصتوں کے منافی ہے۔

9- بندہ نے تحصیل، مندرجہ سے لیٹر ڈوسٹر فل سطح تک (AC دراز بندہ سے کسٹروڈیہ)
جاری کردہ سناری کی سیٹ میں نا اعلیٰ اور بے قاعدہ گپوں کے خلاف جامع دستاویزی
ثبوت کے باقاعدہ حجاز حکام کو ارسال پائے گئے مگر کوئی حق نہیں رہا۔
(Pages 1-29) (رد کارڈ لے)

10- مندرجہ بالا حقائق اور ضابطہ کو مد نظر رکھتے ہوئے کسٹروڈیہ اسٹیشن خالی کی
طرف سے جاری کردہ سناری کی کپیڈ بڈاویہ لٹریچر نمبر 4276/Estt مورخہ 27/07/2019
کو دوبارہ منسوخ کیا جائے اور بندہ کو مہربان کہ مطابق ایسا حق دیا جائے۔
(Pages 30-33)

عین لوازش ہوگی

مورخہ 19-08-2019

العارض

محمد سعید احمد قریشی جوڈیئر کورٹ / ایڈووکیٹ محمد سر اسٹیشن سب ڈسٹریکشن ڈسٹرکٹ
اسٹیشن خان

(25)

VAKALATNAMA

(Power of attorney)

Camp Court DIK

BEFORE THE Honorable KPK Service Tribunal Peshawar

M. Saeed Ahmad Qureshi VERSUS Govt of KPK etc

SUIT/OFFENCE Service Appeal

COUNSEL FOR THE Appellant

M. Abdulillah Baloch HHC

The above named, do hereby appoint, **Muhammad Abid** ADVOCATE HIGH COURT, **DIKHAN**, in the above mentioned matter / case and authorize him to do all or any of the following acts, in my/our name and on my/our behalf, that is to say,

1. To appear, act and plead for me/us in the above mentioned case in this Office /Court/ tribunal in which the same may be tried or heard or any other proceedings what so ever, ancillary thereto, including appeal, revision, Writ petition etc; on payment of fees separately for each court by me / us,
2. To sign, verify, file, present or withdraw all/any proceedings, petitions, appeals, cross objections and application for compromise or withdrawal, or for submission to arbitration of the said case or any other documents, as may be deemed necessary or advisable by him and to conduct prosecution or defense of the said case at all its stages,
3. to undertake execution proceedings, deposit, draw and receive money, cheques, cash and grant receipts thereof and to do all other acts and things which may be conferred to be done for the progress and in the course of prosecution of the said case,
4. To appoint and instruct any other Advocate/ legal practitioner authorizing him to exercise the power and authority conferred upon the advocate whenever he may think fit to do so and to sign Power of Attorney on our behalf,

I /we, the undersigned do hereby agree to ratify and confirm all acts done by the advocate or his authorized substitute in the matter as my /our own acts, as if done by me/us for all intents and purposes, and I / we undertake that I /we or my/our duly authorized agent shall appear in the court on all hearings and will inform the advocate(s) for appearance when case is called and I/we the undersigned agree hereby not to hold the advocate or his substitute responsible if the said case be proceeded ex-parte or dismissed in default in consequence of my/our absence from court when it is called for hearing and for the result of, the said case. I/we the undersigned do hereby agree that in the event of the whole or part of the fees agreed by me/us to be paid to the advocate, if remain unpaid, he shall be entitled to withdraw from prosecution of the above said case until the same is paid and fee settled is only for the above said case and above court and I /we agree hereby that once fee is paid, I/we shall not be entitled for refund of the same in any case whatsoever.

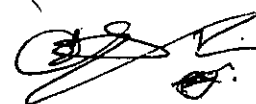
IN WITNESS WHEREOF, I /we do hereby set my/our hand to these presents, the contents of which have been read / read over, explained fully and understood by me/us on

This...20...Day of...12...2019

Accepted By:

MUHAMMAD ABID
ADVOCATE HIGH COURT,
DERA ISMAIL KHAN.

Signature(s) of Client


12101-2021373-7
0332723 8801

خدمت ضابطہ حلیج صاحب سروس ٹریسینگ کنسولٹنگ کورپوریشن ڈیپارٹمنٹ آف ایگزیکیوٹو
صاحب عالی

موجودہ تاریخ گزشتہ ہے کہ بندہ کی سروس اپریل 2019/19

لعنوان محمد سعید احمد قریشی بنام گورنمنٹ آف KPK مینبرہ آئی جی عدالت

میں Admit ہے۔ جس میں Respondents کو نوٹس کرنا مطلوب۔

صاحب عالی - کچھ Respondents کے موجودہ پتے تبدیل ہیں جن کو

Respondent لسٹ میں درست کرنا ضروری ہے تاکہ بروقت صلح ہو سکے اور مناسب

تعمیل ہو سکے

Respondents کے موجودہ پتے درج ذیل ہیں۔

سیریل نمبر ⑧ احمد نعیم (N.T. OPS) روڈ کوچی دفتر ڈیپارٹمنٹ آف ایگزیکیوٹو

سیریل نمبر ⑩ ایما خان (N.T. OPS) روڈ کوچی دفتر ڈیپارٹمنٹ آف ایگزیکیوٹو

سیریل نمبر ⑪ لطف اللہ (N.T. OPS) ڈویژنل ڈرائیور

اسٹیشن گنز ڈرائیور آفیس کچیری ڈیپارٹمنٹ آف ایگزیکیوٹو

سیریل نمبر ⑫ شعیب اللہ خان (N.T. OPS) گنڈا انکوریژیشن ٹانک

صاحب عالی مزبورہ نامہ موجود ہے Respondent list میں درست کرنے کے

متعلق اصحاحات صادر فرمادیں
عین نواز شیخ
مورخہ 26/10/2022

القاری

محمد سعید احمد قریشی و دیگر کلرک/لوٹسفل کمرہ سروس ڈیپارٹمنٹ آف ایگزیکیوٹو
دفتر اسٹیشن گنز ڈرائیور

BEFORE THE HONOURABLE KHYBER PAKHTUNKHUWA SERVICE TRIBUNAL,
CAMP COURT DERA ISMAIL KHAN.

Service Appeal No. 2081/2019.

Muhammad Saeed Ahmed Qureshi, son of Fazal-ur-Rehman, Junior Clerk / Political Muharrir
Tribal Sub Division Dera Ismail Khan. (Appellant)

VERSUS.

1. The Government of Khyber Pakhtunkhuwa through Chief Secretary Khyber Pakhtunkhuwa, Peshawar.
2. The Senior Member, Board of Revenue & Estate Department, Khyber Pakhtunkhuwa, Peshawar.
3. The Commissioner, Dera Ismail Khan.
4. The Deputy Commissioner, Dera Ismail Khan.
5. The Deputy Commissioner, South Waziristan Tribal District.
6. The Assistant Commissioner, South Waziristan.

Official Respondent

7. Attaullah Mehsood, Junior Clerk working in the office of DC, SWTD.
8. Amjad Naeem, presently working as NT (OPS) Tehsil Sararogha SWTD.
9. Khalilullah, Presently working in DC Office Dera Ismail Khan.
10. Ijaz Khan, Presently working as NT (OPS) Tehsil Shakai, SWTD.
11. Tufail Muhammad, Junior Clerk presently working in DC Office, SWTD
12. Sheikh Allah Nawaz, Junior Clerk presently working in DC Office, SWTD
13. Junaid Ahmad, Junior Clerk presently working in DC Office, SWTD
14. Waris Khan, Junior Clerk presently working in DC Office, SWTD
15. *Rehmatullah* Junior Clerk presently working in DC Office, SWTD
16. Noor Sahib, Junior Clerk presently working in DC Office, SWTD
17. Illaudin Karmaz Khel Junior Clerk presently working in DC Office, SWTD
18. Rehman Zada, Junior Clerk presently working in DC Office, SWTD
19. Amirullah, Junior Clerk presently working in DC Office, SWTD
20. Muzamil Khan, Junior Clerk presently working in DC Office, SWTD
21. Tehseen Khan, Junior Clerk presently working in DC Office, SWTD
22. Farmanullah, Junior Clerk presently working in DC Office, SWTD
23. Sarwar Khan, Junior Clerk presently working in DC Office, Tribal Sub Division Tank.
24. Mateeullah, Junior Clerk presently working in DC Office, SWTD
25. Rehmatullah Bittani, Junior Clerk presently working in DC Office, SWTD
26. Meraj Din, Junior Clerk presently working in DC Office, SWTD
27. Ahmad Saeed, Junior Clerk presently working in DC Office, SWTD
28. Zahid Khan, Junior Clerk presently working in DC Office, SWTD
29. Samiullah, Junior Clerk presently working in DC Office, SWTD
30. Muhammad Ali, Junior Clerk presently working in DC Office, SWTD
31. Muhammad Imran, Junior Clerk presently working in DC Office, SWTD
32. Atiq Ur Rehman, Junior Clerk presently working in DC Office, SWTD
33. Khan Shah, Junior Clerk presently working in DC Office, SWTD
34. Zafar Ali, Junior Clerk presently working in DC Office, SWTD
35. Ijaz Khan s/o Malik Ranjhu, presently working as NT (OPS) Tehsil Shaki, SWTD.
36. Khalilullah s.o Imam Bakhsh, presently working in the office of Deputy Commissioner, DIKhan as HVC.

Private Respondents.

Respected Sheweth:

Reply on behalf of the respondents 11 & 12 are narrated as below:-

Preliminary Objections.

1. That the appellant has got no locus standi to file the instant appeal.
2. That the appellant is estopped due to his own conduct to file this appeal.
3. That the appellant has got no cause of action and locus standi to file instant appeal.
4. That the appellant does not come to the tribunal with clean hands and has suppressed all relevant rules.
5. That the appeal is weak having no force, fabricated and factitious based on ill will modified and having no footing in the eyes of law.
6. That the proceedings in the instant appeal would be futile exercise and wastage of precious time of this honorable Tribunal.

BRIEF FACTS:

1. Correct upto the extent that the appellant was appointed as Junior Clerk in the office of Deputy Commissioner, DIKhan (**Settle District**).
2. Correct. Commissioner Office was controlling office of settled District as well as FATA.
3. It is pertain to record. However, in his appointment it does reflect as to whether he was appointed as Political Muharrir. Further, posting on any post cannot be considered as initial appointment and may not be claimed as Seniority.
4. This Para pertains to the service record of the appellant i.e. till Devolution he served as Junior Clerk in the office of Commissioner and getting pay as Junior Clerk.
5. As explained in Para No.3 (above).
6. Incorrect. He was declared as **Surplus** and later-on adjusted in APA FR in 2003.
7. Correct. This Para pertains to record,
8. Not related to the instant case.
9. It is very much clear from the annexure "F" (provided by the appellant) that the was employee of Commissioner/DCO Office (**Settle District**) and that's why has been given seniority from the date of adjustment into FATA Office,
10. Not related to the instant case.
11. Incorrect. Seniority List issued by the respondent No.3 is according to the rules and regulation wherein the appellant has been given seniority from the date of his adjustment in FATA office.

12. Correct. The appellant has been given his due right of seniority and he has already been given seniority according to his date of adjustment in FATA Office.

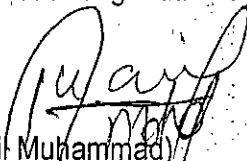
13. Incorrect. Before issuing the final Seniority List, tentative Seniority list was circulated among all the incumbents of FATA/FR Office for submission of their reservations (if any) and after giving due attention to the reservation received within the specified period, the final seniority list was issued according to the Government Rules.


GROUND.

- a) Incorrect. All necessary steps/process were observed according to Law and finalized after fulfilling all codal formalities.
- b) Incorrect. As per rules/regulations, on the adjustment of an official against the post of Political Muharrir shall be considered on the date of his adjustment / transfer in Agency offices (FATA Side).
- c) Incorrect. The Seniority list has been prepared / issued according to rules / regulations of the Government.
- d) Incorrect. Seniority of the official is affected by adjustment or change of cadre as natural phenomena.
- e) Correct. Up-to the extent that the appellant was appointed in the office of Commissioner DIKhan (**Settle District**) and later-on was adjusted in FATA Office and he has been given Seniority according to his date of adjustment in FATA Office as Political Muharrir.
- f) Incorrect. The Seniority List has been prepared after observing all codal formalities.
- g) No comments. Not related to respondent.

PRAYERS.

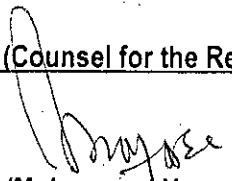
Therefore, it is requested that the appeal of the appellant may please be dismissed with cast throughout.


(Tufail Muhammad)
(Respondent No.11)


(Sheikh Allah Nawaz)
(Respondent No.12).

Respondents

Through (Counsel for the Respondents)


(Muhammad Yousaf)
Advocate Supreme Court of Pakistan
Advocate
Supreme Court of Pakistan
Enrollment No: 4994

"B"

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

No. *2081*

Appeal No. *2081*

of 20 *19*

Muhammed Saeed Ahmad

Appellant/Petitioner

Versus

through Chief Secy. Govt. Pesh.

Respondent

Respondent No. *25*

Notice to:

Rehmatullah Bittani, J/c. Presently working at DC office South Waziristan

WHEREAS an appeal/petition under the provision of the North-West Frontier 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.....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.....

Day of.....20

at Camp Court D.I. Khan

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. TIB

No. *[Signature]*

2081

Appeal No. of 20 ¹⁹
Muhammed Saeed Ahmad

Appellant/Petitioner

Through Chief Secy: UPK Pesh
Versus

Respondent

26

Respondent No.

Meraj Din, J/c, Presently Working

Notice to: -

at DC office South Waziristan

WHEREAS an appeal/petition under the provision of the North-West Frontier 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 ~~25/11/20~~ 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.....

4165

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

Day of *Alad* 20 *20*

at camp court D.I. Khan

[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.

No.

[Handwritten signature]

T/B

Appeal No.....2081..... of 20 19

.....*Muhammad Saeed Ahmad*..... Appellant/Petitioner

Versus

.....*Engr. Chief Saeed Khan*..... Respondent

Respondent No.....27.....

Notice to: —

*Ahmad Saleem, J/c Presently working
at DC, office South Waziristan*

WHEREAS an appeal/petition under the provision of the North-West Frontier 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.....*25/11/20*.....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.....*9/11*.....

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

at Camp Court D.I. Khan

[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.**

No.

TR

Regd

Appeal No..... *2081* of 20 *19*

Muhammad Saeed Appellant/Petitioner
Versus

Through Chief Supt. of Police Respondent
Respondent No..... *28*

Notice to:

*Zahid Khan, J/c Presently working
at DC office South Waziristan*

WHEREAS an appeal/petition under the provision of the North-West Frontier 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.....at 8.00 A.M. If you wish to urge anything against the appeal/petition 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.....*4/12*.....

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

at Camp Court D.I. Khan

[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.

TIB

No.

Appeal No. 2081 of 20 19

Muhamamad Saad Ahmad Appellant/Petitioner

Versus

Enough Chief Secy. 12 Pk Peshawar Respondent

Respondent No. 29

Notice to:

Samiullah Said, J/c Presently working
at DC office South Waziristan.

WHEREAS an appeal/petition under the provision of the North-West Frontier 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.....25-11-20.....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.....4/11.....

Day of.....Nov 11.....20 20

at Camp Court D. I. Peshawar

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.

TB

No.

Appeal No. of 20

2081

19

Regd

Muhammad Saad Appellant/Petitioner
versus

Through Chief Secy. Govt. Peshawar Respondent
Respondent No.

30

Notice to:

*- Muhammad Ali J/c Presently working
at DC office South Waziristan*

WHEREAS an appeal/petition under the provision of the North West Frontier 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.....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.....

Day of.....20

Nov

20

4/16

at Camp Court D.I. Khan

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No. *Regd*

2081

19

Appellant/Petitioner *Muhammad Saeed Ahmad* of *20*

Through *Chief Secy, KDC* Appellant/Petitioner
Nersus

31

Respondent

Muhammad Imran Respondent No. *presently working*
at DC, office South Waziristan

Notice to: _____

WHEREAS an appeal/petition under the provision of the North-West Frontier 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.....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..... *4/16*

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

Day of.....
at Camp Court D.I. Khan

[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.**

TIB

No.

Regd

Appeal No. 2081 of 2018

Muhammad Saeed Ahmad Appellant/Petitioner

Versus

Through Chief Secy, KPK Pesh. Respondent

Respondent No. 32

Notice to: —

*Atty in Retiring J/C Presently working
at DC office South Waziristan*

WHEREAS an appeal/petition under the provision of the North-West Frontier 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.....25-11-20.....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.....4/11/18.....

Day of.....Mon.....20 20

at Camp Court D.I. Khan

[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.

TB

No.

Regd

Appeal No. *2081* of 20 *19*

Muhammad Saad Ahmad Appellant/Petitioner

Versus

Through Chief Secy, P/Plc Peshawar Respondent

Respondent No. *33*

Notice to: —

Khan Shah, J/c Presently working at DC office South Waziristan

WHEREAS an appeal/petition under the provision of the North-West Frontier 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 *25-11-20* 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 *9/11* Day of *Nov* 20 *20*

at Camp Court D.I. Khan

[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.**

No.

T.B

Regd

Appeal No.....2031..... of 20 19

.....Muhammad Saeed..... Appellant/Petitioner
Versus

.....Through Chief Secy..... Respondent
Respondent No.....34.....

Notice to:

Zafar Ali J/c Presently working
at DC office South Waziristan

WHEREAS an appeal/petition under the provision of the North-West Frontier 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.....25-11-20.....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.....6/11/20.....

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

at Camp Court D.I. Khan

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.

TB

No.

Recd

Appeal No. 2921 of 2019

Muhammad Saeed Ahmad Appellant/Petitioner

Versus

Through Chief Secy. Pesh. Respondent

Respondent No. 35

Notice to: —

Naz Khan, S/o Malik Raza Khan Presently
Working Nait Tehsildar (OPS) Tehsil Shakai
Distt: South Waziristan (DOA.)

WHEREAS an appeal/petition under the provision of the North-West Frontier 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 25/11/2019 at 8.00 A.M. If you wish to urge anything against the appellants/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

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

Day of.....Nov.....2020

4th

at Camp Court D.I. Khan

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.

T/B

No.

Recd

Appeal No. 2081 of 2019

Muhamamad Saeed Ahmad Appellant/Petitioner

Versus

Through Chief Secy! (SPD) Peshawar Respondent

Respondent No. 36

Notice to:

Khalidullah S/o (Mam) Balaksh Preshawar
Working in the office of DC, office D.I. Khan
as HVC, (DOA.)

WHEREAS an appeal/petition under the provision of the North-West Frontier 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~~ 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.....
 Day of Nov 20 2019

at Camp Court D.I. Khan

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.