


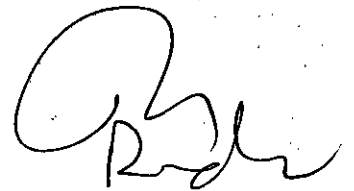
26.05.2022

Counsel for the appellant present.

He requested for adjournment in order to make preparation of the case. Last opportunity is granted. To come up for preliminary hearing on 26.07.2022 before S.B at Camp Court, D.I.Khan.


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

26.7.22 Due to summer vacation to
come up for the same on 27/9/22

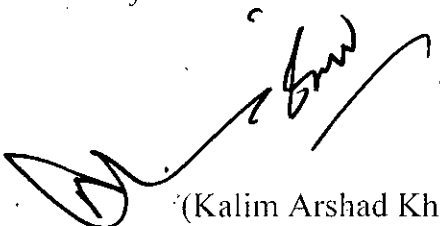


27th Sept 2022

Learned counsel for the appellant present.

2. Learned counsel for the appellant submits that grievance of the appellant has been redressed and he wants to withdraw the instant appeal. As a token of admission of his submission he signed the margin of the order sheet. Dismissed as withdrawn. Consign.

3. *Pronounced in open court in camp court D.I.Khan and given under my hand and seal of the Tribunal on this 27th day of September, 2022.*


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

27.10.2021

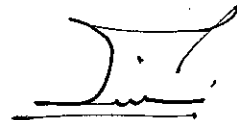
Appellant in person present and requested for adjournment as his counsel is not available today. Adjourned. To come up for preliminary hearing on 24.11.2021 before S.B at Camp Court, D.I Khan.



(ROZINA REHMAN)
MEMBER (E)
CAMP COURT, D.I KHAN

24.11.2021

Appellant alongwith his counsel present. Learned counsel for the appellant requested for time for preparation of preliminary hearing. Adjourned. To come up for preliminary hearing before the S.B on 16.12.2021 at Camp Court D.I.Khan.



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

16.12.2021

Appellant present through counsel and requested for adjournment in order to submit additional documents. Last chance is given with direction to furnish additional documents within 10 days in office. To come up for preliminary hearing on 27.01.2022 before S.B at Camp Court, D.I.Khan.



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

27.01.2022

*Barich is not available,
case is adjourned to 26.5.22
for the same as before*

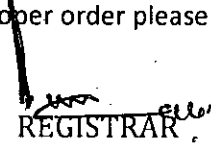


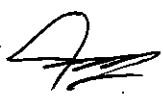
Reader

FORM OF ORDER SHEET

Court of _____

Case No.-

2244 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/02/2021	<p>The appeal of Mr. Khalilullah Kundi resubmitted today by post through Mr. Noor Gul 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 touring S. Bench at D.I.Khan for preliminary hearing to be put up there on <u>26.3.2021</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>26.03.2021</p> <p>Appellant alongwith his counsel present.</p> <p>Learned counsel for the appellant sought further time for preliminary arguments on the ground that he is not prepared for arguments today. Adjourned. To come up for preliminary arguments before S.B at Camp Court D.I.Khan on 21.06.2021.</p> <p style="text-align: right;"> (SALAH-UD-DIN) MEMBER (JUDICIAL) CAMP COURT D.I.KHAN</p> <p>21.6.21</p> <p>due to COVID-19, the case is adjourned to 27.10.21.</p> <p style="text-align: right;"></p>

The appeal of Mr. Khalilullah Kundi Range Officer Wildlife Division D.I.Khan received today i.e. on 21/01/2021 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Annexures of the appeal may be attested. ✓
- 2- Appeal has not been flagged/marked annexures' marks. ✓
- 3- Addressés of respondents no. 6 & 7 are incomplete which may be completed. ✓
- 4- Nine more copies/sets of the appeal along with annexures i.e. complete in all respect ✓ may also be submitted with the appeal.

No. 152 /S.T,

Dt. 22/01 /2021

Mr. Noor Gul Khan
Case

[Signature]
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr.Noor Gul Khan Marwat Adv.
Supreme Court at D.I.Khan.

Addresses of Respondents No.6 & 7

- 1. Ishaq Ahmad Sajeel Range Officer Wildlife Division D.I.Khan**
- 2. Muhammad Shahid Range Officer Wildlife Division Bannu**


**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No. 2244 of 2021

Khalil Ullah Kundi Vs. Govt. of K.P.K. etc
SERVICE APPEAL

S#	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE NO.
1.	Grounds of Service Appeal with application for interim relief	---	1-9
2.	Copy of the advertisement	A	10-11
3.	Copy of office order No.163 dated 08.06.1991 as to appointment of petitioner	B	12
4.	Copy of the promotion order	C	13
5.	Copy of the Seniority List of Range Officers as stood on 31.12.2019	D	14
6.	Copy of the departmental appeal	E	15
7.	Vakalatnama	---	16

Yours Humble Appellant


(Khalil Ullah Kundi)
Through Counsel

0332-8000810

Dt. 19 January, 2021


Noor Gul Khan Marwat
Advocate Supreme Court.

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, CAMP AT D.I.KHAN.**

Service Appeal No. 8244 of 2021.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1528

Dated 21/1/2021

Khalil Ullah Kundi, Range Officer Wildlife, Wildlife Division, D.I.Khan.

Appellant

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Secretary Forest, Wildlife & Fisheries Department, Khyber Pakhtunkhwa, Peshawar.
2. Secretary to Govt. of K.P.K. Forest, Wildlife & Fisheries Department, Peshawar.
3. Chief Conservator Wildlife, Forest Offices, Shami Road Peshawar, Khyber Pakhtunkhwa
4. Conservator Wildlife, Southern Circle, Forest Offices, Shami Road Peshawar
5. Divisional Forest Officer, D.I.Khan Wildlife Division, D.I.Khan.
6. Is'haq Ahmad Sajeel, Deputy Ranger Wildlife,
7. Muhammad Shahid, Deputy Ranger Wildlife,

Respondents

**SERVICE APPEAL UNDER SECTION 4 OF THE K.P.K.
SERVICE TRIBUNALS ACT, 1974, AGAINST THE
SENIORITY LIST OF RANGE OFFICER WILDLIFE AS STOOD
ON 31.12.2019, OFFICE OF THE CHIEF CONSERVATOR
WILDLIFE KHYBER PAKHTUNKHWA, PESHAWAR.**

PRAYER:

ON ACCEPTANCE OF PRESENT SERVICE APPEAL AND BY MODIFYING THE SENIORITY LIST OF RANGE OFFICERS WILDLIFE TO THE EXTENT OF APPELLANT AND RESPONDENTS NO.6 & 7, THE APPELLANT MAY PLEASE BE DECLARED SENIOR TO RESPONDENTS NO.6 & 7 IN THE SENIORITY LIST OF RANGE OFFICER WILDLIFE AS STOOD ON 31.12.2019. IT IS FURTHER PRAYED THAT THE

Re-submitted to -day
and filed.

Registrar
02/01/2021

Filed to day
Registrar
21/1/2021

SENIOR LIST OF 31.12.2019 ALONG WITH ALL PREVIOUS SENIORITY LISTS, IF MAINTAINED PREVIOUSLY BY THE DEPARTMENT SHOWING APPELLANT AS JUNIOR THAN RESPONDENTS NO. 6 & 7, MAY PLEASE BE CANCELLED BY DECLARING THE SAME AS NULL, VOID AND VIOLATIVE OF THE LAW.

Respectfully Sheweth,

1. That the Wildlife Division D.I.Khan vide advertisement dated 16.01.1991 advertised vacancies of Deputy Ranger Wildlife. The appellant and others applied for the said post and finally the appellant and respondents No.6 & 7 were selected and appointed as Deputy Ranger Wildlife vide different office orders of same date i.e. 08.06.1991.

Copy of the advertisement is enclosed as **Annexure A.**

Copy of office order No.163 dated 08.06.1991 as to appointment of petitioner in the Wildlife Division, D.I.Khan is enclosed as **Annexure B.**

2. That the appellant and respondents No. 6 & 7 were appointed through the same Selection Committee under the same advertisement on the same post but through different appointment letters and according to the Rule 17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, as per proviso of Clause (4) in the Explanation-III, "if the date of regular appointment of two or more civil servants in the lower post is the same, the civil servant older in age, shall be treated senior." In this way the seniarity of appellant and respondents No. 6 & 7 was to be reckoned from their age as all other aspects for the calculation of seniarity were one and the same. But the Department illegally and unlawful shown the respondent No.6 as senior from the appellant and respondent No.7 despite the fact that he is younger in age.

3. That Thereafter, the appellant and respondents no. 6 & 7 were promoted to the post of Range Officer Wildlife on the one and same date i.e. 29.03.2016 and still they are serving on the same posts.

Copy of the promotion order is enclosed as **Annexure C.**

4. That the Department maintained the Seniority List of Range Officers on 31.12.2019 whereby the appellant has been shown junior than respondents No.6 & 7, whereas, legally the petitioner and respondents No. 6 & 7 being appointed on one and same date initially, under the same advertisement by the same selection board, the petitioner owing to his elder age was required to be notified as senior than both the respondents No. 6 & 7; but official respondents due to mala-fide and favouritism, illegally shown the petitioner junior than respondents No. 6 & 7. This act of respondents is violation of the service laws governing seniority of civil servants.

Copy of the Seniority List of Range Officers as stood on 31.12.2019 is enclosed as **Annexure D.**

5. That the appellant submitted departmental appeal on 22.09.2020 but with no response till date. Copy of the departmental appeal is enclosed as **Annexure E.**
6. That as the departmental appeal has not been considered despite passing of more than three months, therefore, appellant wants to call in question the seniority of respondents No.6 & 7 on, inter alia, the following grounds:

GROUND:

- i. That the seniority of respondents No.6 & 7 in preference to petitioner is against law, facts, based on malafide, result of improper exercise of jurisdiction and having no binding effect upon rights of the appellant accrued to him by dint of his seniority owing to his elder age.

- ii. That under the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, if two or more civil servants in the lower post is same, the civil servants older in age, **shall** be treated senior. In this Regard Rule 17 of the ibid Rules is very much clear which is reproduced hereunder for sake of convenience:

17. Seniority:- (1) The seniority inter se of civil servants (appointed to a service, cadre or post) shall be determined:-

- (a) in the case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission 2{or as the case may be, the Department Selection Committee;} provided that persons selected for appointment to a post in an earlier selection shall rank senior to the persons selected in a later selection; and
- (b) in the case of civil servants appointed otherwise, with reference to the date of their continuous regular appointment in the post; provided that civil servants selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter se seniority as in the lower post.

Explanation-I:- If a junior person in a lower post is promoted to a higher post temporarily in the public interest, even though continuing later permanently in the higher post, it would not adversely effect the interest of his seniors in fixation of his seniority in the higher post.

Explanation-II:- If a junior person in a lower post is promoted to a higher post by superseding a senior person and subsequently that senior person is also promoted the person promoted first shall rank senior to the person promoted subsequently; provided that junior person shall not be deemed to have superseded a senior person if the case of the senior person is deferred for the time being for want of certain information or for incompleteness of record or for any other reason not attributing to his fault or demerit.

Explanation-III:- A junior person shall be deemed to have superseded a senior person only if both the


junior and the senior persons were considered for the higher post and the junior person was appointed in preference to the senior person.

(2) Seniority in various cadres of civil servants appointed by initial recruitment vis-a-viz those appointed otherwise shall be determined with reference to the dates of their regular appointment to a post in that cadre; provided that if two dates are the same, the person appointed otherwise shall rank senior to the person appointed by initial recruitment.

(3) In the event of merger / restructuring of the departments, attached departments or subordinate offices; the inter se seniority of Civil Servants affected by the merger / restructuring as aforesaid shall be determined in accordance with the date of their regular appointment to a cadre or post.

(4) The inter-se-seniority of civil servants in a certain cadre to which promotion is made from different lower posts, carrying the same pay scale shall be determined from the date of regular appointment/promotion of the civil servants in the lower post.

Provided that if the date of regular appointment of two or more civil servants in the lower post is same, the civil servants older in age, shall be treated senior.


- 
- iii. That in view of the Rule 17(4) of the K.P. Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the petitioner was senior from the very first date of appointment as his date of birth is 22.12.1968, the birth date of respondent No.6 is 24.04.1970, whereas, the date of birth of respondent No.7 is 23.08.1971, thus respondent No.7, by virtue of age, is not only junior than the appellant but also junior from respondent No.6. But, respondents wrongly and illegally prepared the seniority list whereby appellant has been shown junior to respondents No.6 & 7 which has resulted into great miscarriage of justice.
- iv. That being violative of the law, the seniority list dated 31.12.2019 and all the previous seniority lists whereby appellant has been

shown junior to respondents No. 6 & 7, are null & void and are bereft of sanctities of law.

- v. That official respondents were bound to maintain the seniority list of Range Officer in accordance with the mandate of law and seniority of appellant due to his elder age; but they failed to perform their duties within the framework of law relating to seniority of an employee. Hence, the impugned seniority list and all previous seniority lists (if any) showing appellant as junior, are without jurisdiction and outcome of misfeasance.
- vi. That owing to his seniority, appellant is entitled to be promoted in the next higher post/grade in preference to the respondents No.6 & 7 and he is entitled for the restoration of his seniority.
- vii. That the counsel for appellant may be allowed to raise additional grounds at the time of arguments.

It is, therefore, humbly prayed that the present service appeal may please be allowed as prayed for as couched in the prayer and body of appeal.

Yours Humble Appellant


(Khalil Ullah Kundi)
Through Counsel


Noor Gul Khan Marwat
Advocate Supreme Court.

Dt. 19 January, 2021

7 (B)

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No. _____ of 2021

Khalil Ullah Kundi Vs. Govt. of K.P.K. etc
SERVICE APPEAL

CERTIFICATE/VERIFICATION

I, *the appellant*, on this day of January-2021 (*herein mentioned above*) at district D.I.Khan do hereby verify and certify that it is the first Service Appeal on behalf of appellant and no appeal on the subject has earlier been filed.


Appellant

AFFIDAVIT

I, *the Appellant*, do hereby solemnly affirm and declare on oath that all the Para-wise contents of above **Service Appeal** are true & correct to the best of my knowledge and belief and nothing has been deliberately concealed from this Honourable Court.


DEPONENT

8

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.**

Civil Misc. No. _____ of 2021

In Service Appeal No. _____ of 2021

Khalil Ullah Kundi Vs. Govt. of K.P.K. etc
SERVICE APPEAL

**APPLICATION TO PLEASE RESTRAIN
RESPONDENTS FOR AWARDING
PROMOTIONS ON THE POST OF SUB-
DIVISIONAL WILDLIFE OFFICER TILL
FINAL DECISION OF SERVICE
APPEAL.**



Respectfully Sheweth,

1. That a Service Appeal is being filed before this Honourable Court and grounds of same may please be considered as an integral part of this Application.
2. That the appellant has got a strong and prima facie case on the basis of law as well as facts and there is every likelihood of the success of main service appeal hence, balance of convenience tilts in favour of the appellant.
3. That there is only meagre quota of 20% available to the Range Officers for promotion to the post of Sub-divisional Wildlife

Officer but due to erroneous seniority list, rights of appellant are adversely being affected. Therefore, in case of non-grant of interim relief, the appellant will suffer an irreparable loss.

It is, therefore, humbly prayed that on acceptance of the present Civil Misc. Application, respondents may please be restrained from awarding promotions to the post of Sub-Divisional Wildlife Officer, till decision of the main service appeal and in the meanwhile, status quo may please be ordered to be maintained.

Yours Humble Appellant


(Khalil Ullah Kundi)
Through Counsel

Dt. 19 January, 2021


Noor Gul Khan Marwat
Advocate Supreme Court.

AFFIDAVIT: I, ***the appellant/applicant***, do hereby solemnly affirm and declare on oath that all the Para-wise contents of this **application** are true and correct to the best of my knowledge, belief and information and that nothing has been deliberately concealed from this Honourable Court.


Deponent

12

Annex-B

As recommended by the Departmental Selection & Appraisal Committee constituted vide this office order no.172, dated 16/1/1991 for Selection of candidates for the post of Deputy Ranger Wildlife Mr.Khalil ullah S/O Amanullah Khan village & PO Pai, Tehsil Tank District D.I.Khan, is hereby, selected on the basis of merit-cum-fitness & appointed as Deputy Ranger Wildlife in BFS-5 vide Rs.1800-25-1200/- with usual allowance admissible under the Rules against the existing posts in DIKhan Wildlife Division with effect from the date of reports arrival for duty.

The appointments of above Deputy Ranger Wildlife is subject to the following conditions :-

1. He is appointed on purely temporary basis and his service will be terminated without assigning any notice and showing reasons.
2. He is appointed on probation basis for the period of one year extendable upto two(2) year subject to his satisfactory work and conduct otherwise termination from service.
3. The appointment is subject to production of Medical Fitness Certificate from Medical Superintendent District Head Quarter Hospital DIKhan.
4. He should undergo prescribed training course at Sarhad Forest School Abbottabad on allotment of seats and nomination made for said training otherwise, he will be liable to removal from service on Non-compliance of order.
5. One month's ^{advance} notice in case of resignation from service will be necessary from each person or deposition of one month's Pay in lieu thereof. This condition is equally applicable at both ends.
6. He will be governed under existing service Rule Regulation and Acts.

Sdf
(SHEIKH SULEMAN)
Divisional Forest Officer
Wildlife Division DIKhan.

No. 1499/1500/WL

Copy forwarded to the :-

1. Head Clerk/Accountant.
2. Above named official at his home address.

Mamid*

Mamid
Divisional Forest Officer.
Wildlife Division D.I.Khan

D. J. Khan
Divisional Forest Officer,
Wildlife Division DIKhan
8/6

13

Annex-C

OFFICE ORDER NO 50 DATED PESHAWAR THE 23-12-2014,
ISSUED BY SYED MUBARIK ALI SHAH, CHIEF CONSERVATOR WILDLIFE
KHYBER PAKHTUNKHWA PESHAWAR.

As recommended by the Departmental Promotion Committee in its meeting held on 20-11-2014 under the chairmanship of Secretary to Government of Khyber Pakhtunkhwa Forestry, Environment & Wildlife Department vide minutes of the meeting received through Section Officer (Estt), Govt: of Khyber Pakhtunkhwa Environment Department letter No. SO(Estt)/Env/11-3/2011/769-770 dated 22-12-2014, the following Deputy Rangers Wildlife (BPS-11) of Khyber Pakhtunkhwa Wildlife Department are hereby appointed as Range Officer Wildlife in BPS-16 (Rs:10000-800-34000) on acting charge basis with immediate effect in the interest of public service

1. Mr. Ishaq Ahmed Sajil.
2. Mr. Shahid Khan.
3. Mr. Kahlil Ullah.
4. Mr. Anwar Said.

OFFICE OF THE
CONSERVATOR WILDLIFE
SOUTHERN CIRCLE PESHAWAR
Receipt No. 310
Dated 23-12-2014

Sd/-
(Syed Mubarik Ali Shah)
Chief Conservator Wildlife
Khyber Pakhtunkhwa
Peshawar.

265-70
MWL (B-X-11)

copy forwarded for information and necessary action to the:-
Section Officer: (Estt), Government of Khyber Pakhtunkhwa, Forestry,
Environment & Wildlife Department with reference to his above cited letter.
Sector Budget & Accounts, Government of Khyber Pakhtunkhwa, Forestry,
Environment & Wildlife Department.
Conservators Wildlife Southern and Northern Circles.
Officers concerned.
Original files

[Signature]
Divisional Forest Officer,
Wildlife Division D.I. Khan

[Signature]
23/12/2014
Chief Conservator Wildlife
Khyber Pakhtunkhwa
Peshawar

dated Peshawar the 26-12

SUBJECT: - FINAL SENIORITY LIST OF RANGE OFFICER WILDLIFE (BPS-16) OF KHYBER PAKHTUNKHWA WILDLIFE DEPARTMENT AS IT STOOD ON 31-12-2019

In pursuance of Section 8(1) of the Khyber Pakhtunkhwa Civil Servant Act, 1973, read with Rule-17 Civil Servant (Appointment, Promotion and Transfer) Rules, 1989, the Competent Authority is pleased to notify/circulate final seniority list of Range Officer Wildlife (BPS-16) Khyber Pakhtunkhwa, Wildlife Department (as stood on 31-12-2019) for general information.

Annex-D

S#	Name of Officer and Academic Qualification	Date of Birth	1 st entry to Govt Service	Regular Appointment/Promotion to the present post			Departmental examination	Remarks	
				Date	BPS	Method of Recruitment/ Appointment			Present Post
①	Mr. Muhammad Ilyas Matric (Arts)	11-05-1965 Karak	23-11-1986 BPS-05	08-08-2012	16	By promotion	Range Officer Wildlife	Not Passed	By promotion
②	Mr. Altaf Ali Shah, F.Sc (Pre-Medical), B.A and B.Sc Forestry.	02-02-1964 Chitral	01-09-1987 BPS-05	11-03-2014	16	By promotion	Range Officer Wildlife	Passed	By promotion
③	Mr. Abdur Rehman F.Sc (Pre-Medical) B.A M.A Economic	04-01-1962 Lakki	17-09-1987 BPS-05	11-03-2014	16	By promotion	Range Officer Wildlife	Passed	By promotion
④	Mr. Mansoor Saleem F.Sc (Pre-Medical), B.A M.A Economic	28-02-1965 Swat	17-09-1987 BPS-05	02-09-2014	16	By promotion	Range Officer Wildlife	Passed	By promotion
⑤	Mr. Shabir Ahmad Matric (Arts) B.A	02-08-1965 Kohat	04-10-1987 BPS-05	23-12-2014	16	By promotion	Range Officer Wildlife	Passed	By promotion
⑥	Mr. Liaqat Ali Matric (Science) F.A	06-04-1966 Swat	05-11-1989 BPS-05	23-12-2014	16	By promotion	Range Officer Wildlife	Passed	By promotion
⑦	Mr. Kat Baz Khan Matric (Science)	10-11-1971 Kohistan	21-04-1990 BPS-05	23-12-2014	16	By promotion	Range Officer Wildlife	Not Passed	By promotion
⑧	Mr. Mir Aslam Khan Matric (Science) B.A, M.A.	2-06-1966 Lakki Marwat	09-06-1991 BPS-05	23-12-2014	16	By promotion	Range Officer Wildlife	Not Passed	By promotion
⑨	Mr. Ishaq Ahmed Sajil F.A, B.A & M.A	23-08-1971 D.I.Khan	10-06-1991 BPS-05	29-03-2016	16	By Promotion	Range Officer Wildlife	Not Passed	By Promotion
⑩	Mr. Shahid-Khan Matric Science, F.A & M.A	24-04-1970 Bannu	11-06-1991 BPS-05	29-03-2016	16	By Promotion	Range Officer Wildlife	Not Passed	By Promotion
⑪	Mr. Khalil Ullah Matric F.A B.Sc & B.Sc Forestry	22-12-1968 Tank	12-06-1991 BPS-05	29-03-2016	16	By Promotion	Range Officer Wildlife	Not Passed	By Promotion
⑫	Mr. Muhammad Ayub Matric (Science), B.A, B.Sc Forestry	01-01-1967 Swat	06-08-1991 BPS-05	29-03-2016	16	By Promotion	Range Officer Wildlife	Passed	By Promotion
⑬	Mr. Sardar Hadi F.Sc (Pre-Medical)	09-03-1965 Buner	19-09-1991 BPS-05	29-03-2016	16	By Promotion	Range Officer Wildlife	Not Passed	By Promotion
⑭	Mr. Noor Mohammad, Matric (Science), F.A and B.A	01-06-1971 Kohistan	29-10-1995 BPS-05	03-05-2016	16	By promotion	Range Officer Wildlife	Not Passed	By promotion
⑮	Mr. Muhammad Awais Khan, M.Sc Forestry	05-05-1991 Haripur	26-05-2016 BPS-16	26-05-2016	16	Direct Recruitment	Range Officer Wildlife	Passed	Direct Recruitment

Ali Shah

Ali Shah
Divisional Forest Officer
Wildlife Division D.I.Khan

Ali Shah

14

Annex - D

S#	Name of Officer and Academic Qualification	Date of Birth	1 st entry to Govt Service	Regular Appointment/Promotion to the present post			Departmental examination	Remarks
				Date	BPS	Method of Recruitment/ Appointment		
16.	Mr.Ejaz-Ul-Haq, M.Sc Forestry	15-02-1990 Shangla	27-05-2016 BPS-16	27-05-2016	16	Direct Recruitment	Range Officer Wildlife	Not Passed Direct Recruitment
17.	Mr.Kamran Khan, M.Sc Forestry	01-11-1986 Bannu	25-07-2016 BPS-16	25-07-2016	16	Direct Recruitment	Range Officer Wildlife	Not Passed Direct Recruitment
18.	Mr.Saddar Ali, Matric (Science)	14-04-1971 Battagram	29-10-1996 BPS-05	07-09-2017	16	By Promotion	Range Officer Wildlife	Not Passed By Promotion
19.	Mr.Amir Malik, Matric (Science), F.A B.A.	03-03-1977 Manshera	29-10-1996 BPS-05	07-09-2017	16	By Promotion	Range Officer Wildlife	Not Passed By Promotion
20.	Mr.Abdul Basit, B.Sc Forestry	20-11-1990 Shangla	07-03-2018 BPS-16	07-03-2018	16	Direct Recruitment	Range Officer Wildlife	Not Passed Direct Recruitment
21.	Mr.Akhlaq Ahmad, M.Sc Forestry	03-9-1991 Shangla	07-03-2018 BPS-16	07-03-2018	16	Direct Recruitment	Range Officer Wildlife	Not Passed Direct Recruitment
22.	Mian Izaz Alim, M.Sc Forestry	10-09-1989 Swat	16-04-2018 BPS-16	16-04-2018	16	Direct Recruitment	Range Officer Wildlife	Passed Direct Recruitment
23.	Mr.Wasim Ullah, B.Sc Forestry	01-03-1992 Shangla	16-04-2018 BPS-16	16-04-2018	16	Direct Recruitment	Range Officer Wildlife	Not Passed Direct Recruitment
24.	Mr.Ali Gohar, B.Sc Forestry	05-01-1995 Charsadda	10-07-2018 BPS-16	10-07-2018	16	Direct Recruitment	Range Officer Wildlife	Not Passed Direct Recruitment
25.	Mr.Muhammad Naseer Matric	15-04-1961 Kohat	18-11-1979 BPS-01	11-01-2019	16	By Promotion	Range Officer Wildlife	Not Passed By Promotion
26.	Mr.Muhammad Basit Aman							Direct Recruitment
27.	Mr. Muzaffar Shah	19-08-1962 Swat	15-12-1981	27-05-2019	16	By Promotion	Range Officer Wildlife	Trained By Promotion
28.	Mr. Sardar Ali	06-09-1963 Mardan	22-03-1990	24-12-2019	16	By Promotion	Range Officer Wildlife	Trained By Promotion
29.	Mr. Muhammad Shoaib	03-03-1973 Charsadda	28-12-1996	24-12-2019	16	By Promotion	Range Officer Wildlife	Trained By Promotion
30.	Mr.Salah-ud-Din	22-09-1965 FR Bannu	22-09-1984	24-12-2019	16	By Promotion	Range Officer Wildlife	Trained By Promotion

Peshawar the 12/12/2020.

No. 7571-81 /ML (SC)

dated Peshawar the 12/12/2020.

Copy forwarded to all DFOs Wildlife in Southern Circle for information.

Conservator Wildlife Southern Circle
Peshawar.

[Signature]
11/12/2020
Chief Conservator Wildlife
Khyber Pakhtunkhwa
Peshawar

Passed Direct Recruitment

بخدمت جناب چیف کنزرویٹرو اور وائلڈ لائف محکمہ جنگلی حیات صوبہ خیبر پختونخواہ

تھرو پراپر چینل

عنوان: درخواست برائے نظر ثانی سینیارٹی لسٹ

جناب عالی!

گزارش ہے کہ ہم 5 بندے محکمہ جنگلی حیات صوبہ سرحد (خیبر پختونخواہ) وائلڈ لائف ڈویژن ڈیرہ اسماعیل خان میں بطور ڈپٹی ریجنر (BPS-05) میں (روزنامہ مشرق 16 جنوری 1991ء میں اکٹھے واٹر فاول پرجیکٹ میں ایک ہی انٹرویو سے بھرتی ہوئے تھے۔ جبکہ میری Arrival Report ایک دن تاخیر سے ہوئی تھی کیونکہ بندہ ڈیرہ اسماعیل خان سے دور دراز علاقہ پالی تحصیل ضلع ٹانک کا باشندہ تھا اور اس وقت آنے جانے میں کافی دشواری تھی۔

جناب والا! بندہ اپنے دوسرے ساتھیوں سے ماسوائے امیر اسلم خان (ROWL) سے بقایا تمام سے عمر میں سینئر ہے۔ اور سول سروینٹ ایکٹ شق نمبر کے تحت ایک ہی اشتہار اور ایک ہی انٹرویو میں بھرتی ملازمین کی سینیارٹی بذریعہ عمر (Age) تسلیم کی جاتی ہے۔

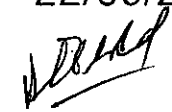
جناب والا! بندہ کی تاریخ پیدائش 1968ء ہے جبکہ مسٹر اسحاق احمد بھیل کی تاریخ پیدائش 1971ء ہے۔ انہیں ہم سے سینئر بنایا گیا ہے، چونکہ پہلے ہم لا علم تھے اور اب تک متاثر بھی نہیں ہوئے تھے جبکہ اس کے بعد اگلے پرموشن کیلئے کوٹہ رینج آفیسر سے سب ڈویژنل وائلڈ لائف آفیسر کیلئے 20% ہے جو کہ نا ہونے کے برابر ہے اور اس سے ہمیں اگلے پرموشن کیلئے بہت ہی کم مواقع ملیں گے۔

لہذا اب امر مجبوری محکمہ کیلئے 29 سال کی خدمات اور اپنی کوالیفیکیشن جو کہ BSc Forestry ہے کو مد نظر رکھتے ہوئے درخواست کرتا ہوں کہ سینیارٹی لسٹ پر نظر ثانی فرمائی جائے۔

آپ کی عین نوازش ہوگی۔

العارض

مورخہ: 22/09/2020



بندہ خلیل اللہ کنڈی رینج آفیسر وائلڈ لائف،

Divisional Forest Officer
Wildlife Division D.I. Khan

وائلڈ لائف ڈویژن ڈیرہ اسماعیل خان



SUPREME COURT
BARR ASSOCIATION
PAKISTAN

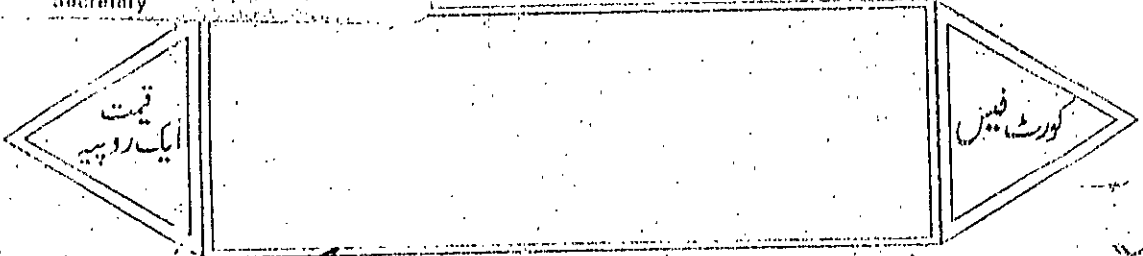
16

Noor Gul Khan Mirwat
Advocate



Life Member

وکالت نامہ



بعدالت جناب خیر بخش خواجہ سروس ٹریبونل لیٹریٹ ڈیپارٹمنٹ / اسماعیل خان

مخاتب ایڈوانٹ

خلیل اللہ کنڈی بنام حکومت خیر بخش خواجہ اور غزو

دعویٰ یا جرم

سروس اسپل

تفصیل دعویٰ یا جرم

باعث تحریر نکتہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بیرونی وجوہات ہی برائے پیشہ تہفیف مقدمہ بمقام ڈیپارٹمنٹ / اسماعیل خان

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے، کہ میں ہر پیشہ پر خود بذریعہ اختیار خاص روز عدالت حاضر ہونا ہوں گا۔ اور ہر وقت ہاگ سے جائے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا، اگر پیشہ پر منظر حاضر نہ ہوں اور مقدمہ میری غیر حاضرگی کی وجہ سے کسی طور پر میرے برخلاف ہو گیا۔ اور صاحب موصوف ایسے کسی طرح ذمہ دار نہ ہوں گے، نیز وکیل صاحب موصوف مقدمہ بمقام کبھری کے علاوہ کسی جگہ یا کبھری کے اوقات سے پہلے یا چھپے یا پردہ لٹیل بیرونی کرنے کے ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف مقدمہ بمقام کبھری کے علاوہ کسی جگہ یا کبھری کے اوقات سے پہلے یا چھپے یا پردہ لٹیل بیرونی کرنے کے ذمہ دار نہ ہوں گے۔ اور مقدمہ مقدمہ کبھری کے علاوہ اور جگہ سماعت ہونے یا پردہ لٹیل یا کبھری کے اوقات کے آگے چھپے پیش ہونے پر منظر کو کوئی تفسیل چھپے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ نہ کیا ادا کرنے یا ٹکائے واپس کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ جہ کو کل ساختہ پر داخلہ صاحب موصوف مل کر وہ اسے خود منظور قبول آگے اور صاحب موصوف کو مرضی دینی یا اجازت دینی یا درخواست دینی اور اسے اصرارے ذمہ داری اور نظر ثانی قبول کرانی اور درخواست پر خود بخود تہفیف کرنے یا اپنی اختیار ہوگا۔ اور کسی علم یا ذکر نہ کرنا اور ہر قسم کا روپہ وصول کرنے اور رسید دینے اور واپس کرنے اور ہر قسم کے بیان دینے اور اس پر جانکی یا راضی نامہ فیصلہ بر خلاف کرنے، اٹھال دینی کا بھی اختیار ہوگا۔ اور بصورت مقررہ ہونے تاریخ پیشی مقدمہ مذکورہ بیرون از کبھری موصوف ہی مقدمہ مذکورہ نظر ثانی و قبول کرانی، برائگی مقدمہ یا منسوخی ذمہ داری یا درخواست حکم امتناعی یا فرقی یا گرفتاری قبل از فیصلہ اجراء ذمہ داری بھی صاحب موصوف کو بشرط ادائیگی معاوضہ عنہ بیرونی کا اختیار ہوگا اور تمام ساختہ پر داخلہ صاحب موصوف مل کر وہ ذات خود منظور قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسے کسی جرم کی کارروائی یا بصورت درخواست نظر ثانی قبول یا گرفتاری یا دیگر معاملہ مقدمہ مذکورہ کی دوسرے وکیل یا جرم کو اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور دینے اختیارات حاصل ہوں گے۔ جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جو جگہ ہر جگہ التزام ہو جائے وہ صاحب موصوف کا حق ہوگا۔ نیز صاحب موصوف کو ہر ویسے تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو ہر اختیار ہوگا کہ وہ مقدمہ کی بیرونی نہ کریں اور اپنی ضرورت شرعیہ کوئی مثال کسی قسم صاحب موصوف کے برخلاف نہیں ہوگا۔

موجودہ 19 جنوری 2021ء

لہذا وکالت نامہ صادر ہے۔ تاکہ سند ہے

مضمون وکالت نامہ سن لیا ہے۔ اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

Accepted
Noor Gul Khan
ASL

العبد