

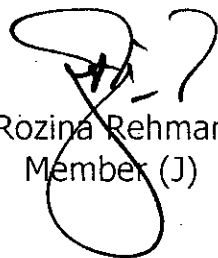
25.07.2022

Nemo for appellant.

Muhammad Adeel Butt, learned Additional Advocate General alongwith Naeem Gul AD for respondents present.

Case was called time and again but none appeared on behalf of appellant till rising of the Bench. As such the instant service appeal stands dismissed in default for non-prosecution. No order as to costs. File be consigned to the record room.

Announced
25.07.2022


(Rozina Rehman)
Member (J)

15.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 07.6.2022. for the same as before.


Reader.

07.06.2022

Clerk of counsel for the appellant present.

Muhammad Riaz Khan Paindakheil learned Assistant Advocate General present. Nemo for respondent Department.

Reply on behalf of respondents is still awaited. Notice be issued to respondents for submission of comments in office within 15 days of the receipt of notice, positively. If the reply/comments are not submitted within stipulated time, right of respondents shall be deemed as struck off. To come up for reply/comments on 25.07.2022 before S.B.


(Rozina Rehman)
Member (J)


27.01.2022

Appellant alongwith counsel present. Mr. Kabirullah Khattak, Addl. AG alongwith Mr. Tariq Hussain S.O, Naeem Gul, A.D (Litigation) & Naeemullah, Assistant for respondents present.

Reply/comments on behalf of respondents are still awaited. Representatives of respondent requested for time to furnish reply/comments. Request allowed.

Mr. Noor Muhammad Khattak, Advocate present and submitted an application for impleadment of 41 private respondents, which is placed on file and copy of the same is handed over to the learned counsel for the appellant.


To come up for reply/comments on impleadment application as well as reply on main appeal before the S.B on 01.02.2022.


(Atiq Ur Rehman Wazir)
Member (E)

01.02.2022

Nemo for the appellant. Mr. Muhammad Adeel Butt, Addl. AG alongwith Mr. Naeem Gul, AD (Litigation) for respondents present and submitted Minutes of Meeting held on 31.01.2022 which is placed on file.

Reply/comments on behalf of respondents are still awaited. Representative of respondents sought time for submission of reply/comments. Notice be issued to the appellant and his counsel for submission of reply/comments on impleadment application as well reply on main appeal before the S.B on 15.03.2022.



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

27.12.2021

This appeal was fixed for 30.12.2021. The appellant turned up today and submitted an application for listing of the appeal for preliminary hearing today. Application is placed on file. The appeal is listed for today. The appellant has been heard.

Subject to all just and legal objection, the appeal is admitted for full hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 17.01.2022 before S.B at camp court,

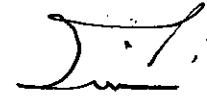
Appellant Deposited
Security & Process Fee at Abbottabad.


Chairman
Camp Court, A/Abad

17.01.2022

Counsel for the appellant present. Mr. Naeem Gul, Assistant Director (Litigation) and Mr. Aziz Ullah Jan, Deputy Director alongwith Mr. Kabirullah Khattak, Additional Advocate General for the respondents present and requested for further time for submission of written reply/comments.

Learned counsel for the appellant requested that the appeal in hand may be fixed for submission of written reply/comments at Principal seat Peshawar. Adjourned. To come up for submission of written reply/comments on 27.01.2022 before the S.B at Principal seat Peshawar.

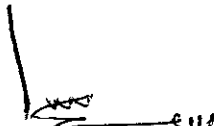


(Salah-ud-Din)
Member (J)
Camp Court A/Abad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7875/2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/12/2021	<p>The appeal of Mr. Ahmad Zaman presented today by Hafiz Kala Khan 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>
2-		<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put there on <u>30/12/21</u></p> <p style="text-align: right;"> CHAIRMAN</p>

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

Service Appeal No 7875 /2021

Ahmed Zaman, District Sports Officer Mansehra.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Sports, Culture and
Tourism Department Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

INDEX

S.#	Description	Page No.	Annexure
1.	Service Appeal alongwith affidavit	1 to 9	
2.	Copy of the application	10	"A"
3.	Copy of NOC dated 29/03/2021	11	"B"
4.	Copy of the application containing remarks of the Minister	12	"C"
5.	Wakalatnama	15	

Through;

...APPELLANT


Dated: 15/12 /2021

(HAFIZ KALA KHAN)
Advocate High Court, at Haripur



①

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 8042

Dated 15-12-2021

Service Appeal No. 7875/2021

Ahmed Zaman, District Sports Officer Mansehra.

...APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Chef Secretary Khyber Pakhtunkhwa Peshawar.
2. Secretary to the Government of Khyber Pakhtunkhwa Sports and Youth Affairs Department Peshawar.
3. Director General Sports Khyber Pakhtunkhwa Peshawar.
4. Director Youth Affairs Department Khyber Pakhtunkhwa Peshawar.

...RESPONDENTS

SERVICE APPEAL UNDER SECTION 4

OF THE SERVICE TRIBUNAL ACT 1974

TO THE EFFECT THAT RESPONDENT

NO.2, DESPITE ISSUANCE OF NOC

VIDE NO. PF/51-17/POSTING /

TRANSFER OFFICE / DATED 29/03/2021

AND CONSENT OF THE CHIEF

MINISTER / MINISTER SPORTS KPK

Filed to-day
Registrar
15/12/2021

PESHAWAR, HAS NOT ALLOWED THE
ABSORPTION AND POSTING OF
APPELLANT IN YOUTH AFFAIR
DEPARTMENT AS AN ASSISTANT
DIRECTOR, AS SUCH, THE ACT OF
RESPONDENT NO.2 IS ILLEGAL,
AGAINST THE LAW, MALAFIDE,
CAPRICIOUS AND HENCE,
INEFFECTIVE UPON THE RIGHTS OF
APPELLANT, **AND**, PRAYING THAT
ON ACCEPTANCE OF THE INSTANT
APPEAL THE IMPUGNED ACT OF
RESPONDENT NO.2 MAY
GRACIOUSLY BE DECLARED NULL
AND VOID AND HE BE DIRECTED TO
FORTHWITH ABSORB THE
APPELLANT IN YOUTH AFFAIR
DEPARTMENT AS AN ASSISTANT
DIRECTOR WITH EFFECT FROM
29/03/2021. WHEN THE NOC WAS
ISSUED BY THE RESPONDENT NO.3.
ANY OTHER RELIEF WHICH DEEM FIT
AND PROPER IN THE
CIRCUMSTANCES OF THE CASE.

Respectfully Sheweth,

Brief facts giving rise to the instant service appeal are as under;-

1. That the appellant was appointed as District Sports Officer in the year 2009 through Public Service Commission.
2. That at the relevant time sports and youth affairs were one and the same department and the appellant had been serving in both the capacities.
3. That in the year 2018 both the departments i.e; Sports and Youth affairs were separated and directorate of Youth Affairs under the control of Director General Sports was established.
4. That as the appellant has been dealing with Youth Affairs in his capacity as District Sports Officer, therefore, the respondents

were bound to offer the appellant for his absorption as per his choice. However, no such offer was ever made to the appellant.

5. That in January 2020, the appellant submitted an application to respondent No.2 for his absorption as an Assistant Director Youth Affairs Khyber Pakhtun Khwa , which application was moved to respondent No.3 for NOC. under letter No. So(Sports) 1-6/2021/4404-07 Dated 11-03-2021 *Copy of the application is attached as Annexure "A".*
6. That upon the said application respondent No.2 vide officer letter No.PF/51-17 / Posting / Transfer Office dated 29/03/2021 issued NOC for absorption of appellant in the Directorate of Youth Affair Khyber Pakhtun khwa as an Assistant Director. *Copy of NOC dated 29/03/2021 is attached as Annexure "B".*
7. That the appellant waited for sufficient time but respondent No.2 did not act upon the

(5)

NOC and consequently the appellant submitted application to the Chief Minister / Minister Sports Khyber Pakhtunkhwa with the same request. Upon the said application the Minister directed / ordered respondent No.2 to process the case but till date no action has been taken by respondent No.2.

Copy of the application containing remarks of the Minister is attached as Annexure "C".

8. That feeling aggrieved of the afore stated situation, the applicant has now come to this Honourable Service Tribunal Khyber Pakhtun Khwa Peshwar, with the instant appeal in hand inter-alia on the following grounds;-

GROUNDS:-

- a) That the impugned act of respondent No.2 in dilly dallying the matter of absorption of appellant, despite NOC and direction of the Minister amounts to willful and deliberate

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defiance of the legal and lawful order of the Minister hence, the same is liable to be set-aside.

- b) That the appellant has rendered services for Youth Affair Department and his absorption in the said department was his preferential right which has been denied by the respondents.
- c) That keeping in view the experience and services rendered by the appellant, especially when there was no cavil in the way of absorption of appellant in Youth Affair Department the respondents should have allowed the request of appellant at first instance.
- d) That the act of respondent in not absorbing the appellant in the Youth Affair Department speaks volume of favoritism and abuse of authority, hence, the impugned act of respondents is liable to be set-aside.

(7)

- e) That the appellant had delivered his endeavors for promotion of sport and Youth related activities during his posting in different Districts of Khyber Pakhtunkhwa and has been awarded with certificate of appreciation as recognition to his services for the well fare of the sports and traditional games in the province, as such a right has been accrued in favour of appellant that his services be absorbed in the Youth Department. Attached **Annexure D**
- f) That the appellant had gained sufficient experience in the filed of office management, office administration, and coordination with District Administration, Line Departments, elected representative, sports associations, traditional formal and informal sports personals etc. Therefore the appellant is the best person to be absorbed in the Youth Affiar Department.

(8)

g) That other points will be urged at the time of arguments with the permission of Honourable Tribunal.

It is therefore, most humbly prayed that on acceptance of the instant appeal the impugned act of respondent No.2 may graciously be declared null and void and he be directed to forthwith absorb the appellant in youth affair department as deputy director with effect 2018 or from 29/03/2021 when the NOC was issued by the respondent No.3. Any other relief which deem fit and proper in the circumstances of the case.

...APPELLANT

Through;

Dated: 15/12 /2021

(HAFIZ KALA KHAN)
Advocate High Court, at Haripur

VERIFICATION:-

Verified on oath that the contents of foregoing appeal are true and correct to the best of our knowledge and belief and nothing has been concealed therein from this Honourable Court.

...APPELLANT

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

Service Appeal No. _____ /2021

Ahmed Zaman, District Sports Officer Mansehra.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Chief Secretary Khyber
Pakhtunkhwa Peshawar.

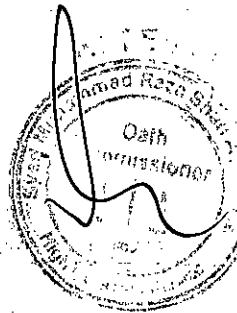
...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, *Ahmed Zaman, District Sports Officer Mansehra*, do hereby declare
on oath that the contents of foregoing appeal are true and correct to the best
of my knowledge and belief and that nothing has been suppressed form this
Honourable Court.


DEPONENT



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"Annex A"

To

The Secretary to the Government of
Khyber Pakhtunkhwa Sports and Youth Affairs Department
Peshawar.

Through: Proper Channel

Subject: REQUEST FOR THE ABSORPTION & POSTING IN YOUTH AFFAIR
DEPARTMENT AS A ASSISTANT DIRECTOR

Dear Sir,

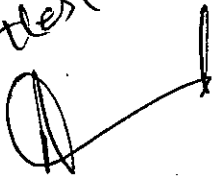
It is respectfully submitted that I am presently working as a District Sports Officer (BS-17) in Sports & Youth Affairs Department and have been posted in District Manshehra, Haripur & Swabi. The recruitment against the said post was recommended by the Public Service Commission Khyber Pakhtunkhwa in 2009. I did my MSc (Physics), Physical Education from the University of Peshawar and Sarhad University Peshawar respectively. I also got diploma in Civil drafting from Technical Board Peshawar copy of my CV is attached as reference please.

It is further added for your kind information that I had delivered my endeavors for promotion of Sports & Youth related activities during my posting in different Districts of Khyber Pakhtunkhwa as such Sports & Youth Affairs Department as well as District Administration & District Sports Associations had awarded certificates etc as recognition to my services for the welfare of the sports & traditional games in the province. I was also a player of athletics & Kabaddi. I had made efforts to ensuring maximum number of Youth towards the play grounds in urban population & Rural Youth to the traditional games venues. In this regard awareness complains was also lunched for stimulating the streets Youth towards the playing areas. These initiatives had accordingly been acknowledged at gross root level, District & Provincial level. The Deputy Commissioner Haripur had recommended me under letter No. A-E/6400/DCO(H), Dated: 10/09/2012 for my absorption in finance and planning department copy enclosed.


It is submitted that I had gained sufficient experience in field of office Management, Office Administration, Coordination with District Administration, Line Departments, Elected Representative, Sports Associations, traditional formal and informal sports personal etc.

In view of the above it is submitted and prayed that my services my kindly be absorbed in Youth Affairs Department Khyber Pakhtunkhwa as a Assistant Director.

I would be thankful for this act of kindness in anticipation.

Attested


Yours Obedient


Ahmed Zaman
District Sports Officer
0315-5805388

11

“Annex B”



Sports are essential for the development of a happy, healthy & vigorous society

DIRECTORATE GENERAL OF SPORTS
KHYBER PAKHTUNKHWA
PESHAWAR SPORTS COMPLEX, PESHAWAR CANTT.
Ph: # 9212767, Fax # 9212766

No.PF/51-17/Posting/Transfer Office/

Dated 29/3/2021

To

The Secretary to Government of Khyber Pakhtunkhwa,
Sports, Culture, Tourism, Museums, Archaeology &
Youth Affairs Department.

Subject: REQUEST FOR ABSORPTION & POSTING IN YOUTH AFFAIRS
DEPARTMENT (DIRECTORATE) AS ASSISTANT DIRECTOR

Dear Sir,

I am directed to refer to the Sports Department Khyber Pakhtunkhwa letter No.SO(Sports)1-6/2021/4404-07 dated 11.03.2021 on the above captioned subject and to state that this office has no objection on absorption of Mr. Ahmed Zaman (BS-17) District Sports Officer Mansehra in the Directorate of Youth Affairs Khyber Pakhtunkhwa.

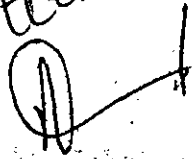
Yours faithfully,


29/3/21
8/2 (NAZIA ZAKI)
Assistant Director (HQs)

Copy forwarded for information to:-

1. Director General Sports Khyber Pakhtunkhwa
2. Deputy Director (HQs), Office of Director General Sports


29/3/21
8/2 Assistant Director (HQs)

Attested


12

Annexure C

To

The Honorable Chief Minister
Khyber Pakhtunkhwa
Peshawar.

Through: Proper Channel

Subject: REQUEST FOR THE ABSORPTION & POSTING IN YOUTH AFFAIR
DEPARTMENT AS A ASSISTANT DIRECTOR

Dear Sir,

It is respectfully submitted that I am presently working as a District Sports Officer (BS-17) in Sports & Youth Affair Department and have been posted in District -Mardan (Haripur & Swabi) The recruitment against the said post was recommended by the Public Service Commission Khyber Pakhtunkhwa in 2009 I did my MSc (Physical Education) from the University of Peshawar and Sahiwal University Peshawar. I also got diploma in Civil drafting from Technical Board Peshawar copy of my CV is attached as reference please

It is further added for your kind information that I had delivered my endeavor for promotion of Sports & Youth related activities during my posting in different Districts of Khyber Pakhtunkhwa as such Sports & Youth Affair Department as well as District Administration & District Sports Associations had awarded certificates etc as recognition to my services for the welfare of the sports & traditional games in the province I was also a player of athletics & Kabaddi. I had made efforts to ensuring maximum number of Youth towards the play grounds in urban population & Rural Youth in the traditional games venues. In this regard awareness complains was also launched for stimulating the streets Youth towards the playing arenas. These initiatives had accordingly been acknowledged at gross root level, District & Provincial level. The Deputy Commissioner Haripur had recommended me under letter No. A-E/6400 DCO(H). Dated: 10/09/2012 for my absorption in finance and planning department copy enclosed.

It is submitted that I had gained sufficient experience in field of office Management, Office Administration, Coordination with District Administration, Line Departments, Elected Representative, Sports Associations, traditional formal and informal sports personal etc.

In view of the above it is submitted and prayed that my services my kindly be absorbed in Youth Affair Department Khyber Pakhtunkhwa as a Assistant Director.

I would be thankful for this act of kindness in anticipation.

Sent Tourism
PK Province
relat

Yours Obedient

[Signature]
Ahmad Zaman
District Sports Officer
0315-5805388

Attended
[Signature]

13

"Annexure D"



OFFICE OF THE DEPUTY COMMISSIONER, HARIPUR

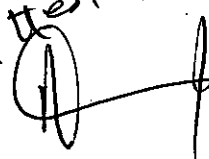
No. PS/DC(H)/2019
Dated 18.04.2019

I thank you and your team for all the cooperation that you have extended in implementation of government policies, service delivery and making the life of citizens of District Haripur comparatively easier. I hope you will continue to work with dedication and passion to serve the people as true public servants.

With best wishes & warm regards


(ZAHID PERVEZ WARRAICH)
DEPUTY COMMISSIONER HARIPUR

Mr. Ahmad Zaman,
District Sports Officer, Haripur.

Attended




Certificate



This Certificate is being Awarded by the District Administration to

Mr. Ahmad Zaman District Sports Officer Haripur

On account of the Best Achievement In the

"UNDER 23 INTER DISTRICT YOUTH GAMES HAZARA DIVISION 2018 KHYBER PAKHTUNKHWA"

Held On 12th April to 15th April 2018 In APS Abbottabad.

Syed Fayaz Ali Shah
Deputy Commissioner
Haripur

Sara Rehman
Assistant Commissioner Haripur/
Chairman Under 23 Games



وکالت نامہ

کورٹ فیس
قیمتی

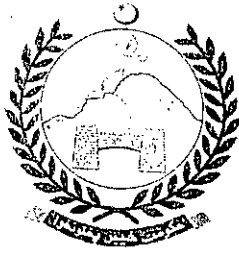
بعدالت جناب
مجاہد احمد زماں
گورنمنٹ جینڈرٹو خواہ عدالتہ جینڈرٹو

دعویٰ یا جرم
باعت تحریر آنکہ
مندرجہ بالا عنوان میں اپنی طرف سے بیرونی وجوہات ہی مقام

محافظہ کالاخان ایڈووکیٹ بدیں شرط وکیل مقرر کیا کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص زور عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دے کر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہوں اور حاضری کی وجہ سے کسی وجہ پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی اور جگہ یا کچہری کے مقرر اوقات سے پہلے یا بروز تعطیل بیرونی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ مقام کچہری کے کسی اور جگہ سماعت ہونے پر یا بروز کچہری کے اوقات کے آگیا یا پیچھے ہونے پر مظہر کو کوئی نقصان پہنچے تو ذمہ دار یا اس کے رابطے کسی معاوضہ ادا کرنے مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھے کل ساختہ پرواختہ صاحب مثل کردہ ذات خود منظور قبول ہوگا اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجرائے ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراء کرنے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپرد وراثی و راضی نامہ و فیصلہ برخلاف کرنے اقبال دعوے کا اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم انتہائی یا ڈگری قبل از فیصلہ اجرائے ڈگری بھی صاحب موصوف کو بشرط ادا ہوگی علیحدہ بیرونی مختار نامہ کرنا مجاز ہوگا۔ اور بصورت ضرورت اپیل یا اپیل کے واسطے کسی روز سزے وکیل یا بیرونی کو بجائے اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جسے صاحب موصوف کو پوری نہیں تاریخ پیشی سے پہلے ادا نہ کر دیا گیا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیرونی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے حفظان کو ہوگا۔ لہذا مختار نامہ لکھ دیا کہ صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیرونی نہ کرے۔ مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا اور منظور ہے۔

مورخہ 15 ستمبر 2021ء

احمد زماں
مجاہد احمد زماں



**GOVERNMENT OF, KHYBER PAKHTUNKHWA,
SPORTS, TOURISM, ARCHAEOLOGY, MUSEUMS
& YOUTH AFFAIRS DEPARTMENT.**

13-A, KHYBER ROAD, PESHAWAR CANTT:



091- 9223448.



091-9212535.



Sportslitigation@gmail.com

NO. SO(LIT)/S&TD/1- 425/2021/Ahmad Zaman
Dated Peshawar the, 01st February, 2022.

/4889-90

To

1. The Director General Sports,
Khyber Pakhtunkhwa.
2. The Director Youth Affairs,
Khyber Pakhtunkhwa.

Subject:

**SERVICE APPEAL NO. 7875/2021 TITLED "AHMAD ZAMAN V/S GOVT. OF
KHYBER PAKHTUNKHWA THROUGH SECRETARY SPORTS TOURISM, AND
OTHERS".**

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith minutes of the subject meeting held on 31-01-2022 under the chairmanship of Additional Secretary-II, Sports & Tourism Department for further necessary action, please.

Yours faithfully,

Section Officer (Lit. Assembly)

Endst: of even No. & dated.

A copy is forwarded for information to the:-

1. PS to Secretary Sports & Tourism Department.
2. PA to Additional Secretary-II Sports & Tourism Department.

Section Officer (Lit. Assembly)

Subject:

MINUTES OF MEETING IN SERVICE APPEAL NO. 7875/2021 TITLED AHMAD ZAMAN VS GOVT. OF KHYBER PAKHTUNKHWA THROUGH SECRETARY SPORTS & OTHERS HELD ON 31-01-2022 AT 11:30 AM.

A meeting regarding the subject case was held on 31-01-2022 at 11:30 AM, under the chairmanship of Additional Secretary-II, Sports & Tourism Department in his office.

The following attended the meeting:

1. Mr. Khalid Khan Director General Sports, Khyber Pakhtunkhwa.
2. Mr. Saleem Jan Director Youth Affairs, Khyber Pakhtunkhwa.
3. Mr. Tariq Hussain Section Officer Litigation, Sports & Tourism Department.

Meeting started with recitation from the Holy Quran. The chair welcomed all the participants, discussed the aforesaid case in detail. During discussion Director General Sports highlighted the forum that as the petitioner namely Ahmad Zaman, District Sports Officer Mansehra (BPS-17), has been posted as District Sports Officer Abbottabad & assigned with the additional charge of Regional Sports Officer Abbottabad in OPS vided notification No.SO(Sports01-5/2022/4799-4807 dated 27-01-2022 (F/A), therefore he is willing on the aforesaid Notification. He further stated that consequently the petitioner has submitted an application for withdrawal of his Service Appeal bearing No.-7875/2021 which is fixed for reply of respondents on 01-02-2022.

As the petitioner himself i.e. Mr. Ahmad Zaman has submitted an application (F/B) to the extent of withdrawal/ non-pursuing his aforesaid Service Appeal, therefore the forum decided that there is no need for preparation of Parawise comments in the instant Service Appeal.

The meeting ended with the vote of thanks from the chair.

Attended.


31/1/2022

AD (Litigation)



GOVERNMENT OF KHYBER PAKHTUNKHWA
SPORTS, TOURISM, CULTURE, ARCHAEOLOGY,
MUSEUMS & YOUTH AFFAIRS DEPARTMENT
(Sports & Youth Affairs Section)

Dated Peshawar the 27th January, 2022

NOTIFICATION

No. SO (Sports) 1-5/2022/4777-4807 The following posting / transfer is hereby made amongst the officers / officials of Directorate General of Sports, Khyber Pakhtunkhwa with immediate effect, in the best public interest -

Sr. #	Name, BPS & Designation	From	To
1	Mr. Niamat Ullah Khan, BS-18, DD/RSO	O/o Dte. Gen. of Sports, Khyber Pakhtunkhwa	RSO, Mardan
2	Mr. Aziz Ullah Jan, BS-18, DD/RSO	O/o Dte. Gen. of Sports, Khyber Pakhtunkhwa	RSO, Peshawar
3	Mr. Mir Bashir Khan, BS-18, DD/RSO	RSO, Peshawar	Deputy Director, Directorate of Sports / Focal Person Arbab Niaz Cricket Ground & Hayat Abad cricket Ground
4	Mr. Anwar Kamal Burki RSO, Bannu (BPS-18) (OPS)	RSO, Bannu	DSO D.I. Khan/ Assign the additional charge of RSO D.I. Khan
5	Mr. Razi Ullah,	RSO DI Khan	RSO Bannu in OPS
6	Mr. Muhammad Jamshed, BS-17, ADs / DSOs / Administrators	DSC, Mardan	Assigned the Additional Charge of DSO Peshawar By Reliving DSO Charsadda From Additional Charge of DSO Peshawar
7	Mr. Muhammad Suleman, BS-17, ADs / DSOs / Administrators	Administrator1, Mardan Sports Complex, Mardan (w.e.f 30-11- 2021)	Also Assigned the Additional Charge of Administrator 2 Mardan
8	Mr. Amjad Iqbal, BS-17, ADs / DSOs / Administrators	O/O Dte. Gen. of Sports Khyber Pakhtunkhwa	Administrator Regional Sports Office, Peshawar.
9	Mr. Ahmad Zaman District Sports Officer (BPS- 17)	District Sports Officer, Mansehra	DSO. Abbottabad & Assigned the Additional Charge of RSO Abbottabad in OPS

Attended
31/1/2022

10	Mr. Munir Abbas Assistant Director (BPS-17)	Assistant Director On deputation to CTA	O/O Directorate General of Sports Khyber Pakhtunkhwa
11	Mr. Hamid Ali Assistant Director (BPS-17)	Assistant Director Litigation O/O Dte Gen of Sports Khyber Pakhtunkhwa	Assistant Director (HQ) O/O Directorate General of Sports Khyber Pakhtunkhwa
12	Mr. Arshadullah Superintendent (BPS-17)	O/O Directorate General of Sports Khyber Pakhtunkhwa	Supdt RSO Office, Peshawar.
13	Mst. Haya Naz Superintendent (BPS-17)	Regional Sports Office, Peshawar	Superintendent O/O Dte. Gen. of Sports Khyber Pakhtunkhwa
14	Mr. Ubaid Ullah Khan Computer Operator (BPS-16)	DSO Office Swat	DSO Swat (Ops)
15	Mr. Ghulam Mustafa Computer Operator (BPS-16)	O/o DSO Manshura	DSO Manshura (Ops)
16	Mr. Shehryar Ahmad, Superintendent (BPS-17)	Administrator 2, District Sports Office Mardan	Relieved to parent Department i.e. Establishment Department
17	Mr. Muhammad Tariq SDO Engineering Wing (BPS-17)	O/O Directorate General of Sports Khyber Pakhtunkhwa	Report to Sports Department
18	Mr. Muhammad Akram, Computer Operator (BPS-16)	DSO Office Battagram	DSO Battagram (Ops)
19	Mr. M Aarif Computer Operator (BPS-16)	O/o DSO Kolai Palas	DSO (Ops) Kolai Palas by Relieving AC Kolai Palas From DSO Kolai Palas From Additional Charge
20	Mr. Adil Shah Superintendent (BPS-17)	Senior Coach DSO Office Bannu	District Sports Officer Tank (BPS-17) (OPS)
21	Mr. Amir Zaman Assistant (BPS-16)	District Sports Office Peshawar	District Sports Officer, Chitral Lower (BPS-17) (OPS) Additional Charge of DSO Upper Chitral
22	Mr. Ibrar Ahmad Assistant (BPS-16)	DSO (Ops), Lower Dir	DSO (Ops), Dir Upper Additional Charge
23	Mr. Tehsin Ullah Computer Operator (BPS-16)	O/o DSO, Shangla	DSO, Shangla (OPS)
24	Mr. Ishfaq Ahmad Computer Operator (BPS-16)	AD (HQ) (Ops) O/o Dte. Gen of Sports, Khyber Pakhtunkhwa	Assigned the additional charge of AD (Litigation) Ops

Attested.

31/11/2022

25	Mr. Rafiullah Computer Operator (BPS-16)	o/o DSO, Malakand	DSO, Malakand (Ops)
26	Mr. Muhammad Amin Computer Operator (BPS-16)	District Sports Office Kohistan Upper	District Sports Officer, Kohistan Upper (OPS)
27	Mr. Saqib Computer Operator (BPS-16)	Presently working in Planning Section of Sports department	Report to Directorate General of Sports, Khyber Pakhtunkhwa

Sd/
Secretary
Sports, Tourism, Culture, Archaeology,
Museums & Youth Affairs Department,
Khyber Pakhtunkhwa

Endst No. SO (Sports) 1-5/2022/ 4799-4807 date Peshawar the 27th January, 2022

Copy to the:-

1. Accountant General, Khyber Pakhtunkhwa.
2. Director General Sports, Khyber Pakhtunkhwa.
3. PS to Secretary, Sports & Youth Affairs Department.
4. PA to Additional Secretary-II, Sports & Youth Affairs Department.
5. PA to Deputy Secretary-I, Sports & Youth Affairs Department
6. PA to Deputy Secretary-III, Sports & Youth Affairs Department
7. Officers / officials concerned

Attested.
R. Q. M.
31/1/2022

Section Officer (Sports)

OFFICE OF THE REGIONAL SPORTS OFFICER

ABBOTTABAD

House No. 11, Abbottabad

Phone No. 091-9410121

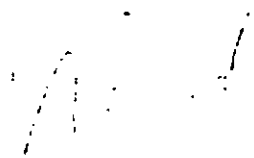
Fax No. 091-9410121

Office: General Sports
310, Faisal Chowk

COURT CASE

It is submitted that the undersign has submitted a copy of the
request of mine the respected Secretary Sports to the
Government so that I will withdraw my case on the C.P.S. Board.

Attested.



Ahmed Zaman
Regional Sports Officer
Abbottabad

Original

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

C.M NO. _____ / 2022

IN

APPEAL No.7875/2021

Ahmad Zaman

VS

Government of KPK

**APPLICATION FOR IMPLEADMENT OF THE BELOW
MENTIONED YOUTH OFFICERS(BPS-17) AND COMPUTER
OPERATORS (BPS-16) POSTED IN THE OFFICE OF
RESPONDENT NO.4 IN THE ARRAY OF RESPONDENTS AS
PRIVATE RESPONDENTS IN THE ABOVE TITLED APPEAL.**

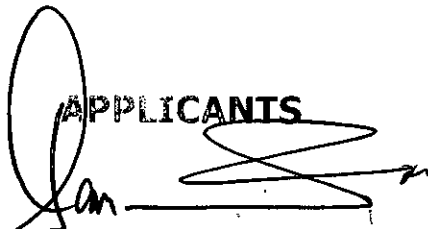
1. **ZUBAIR AHMAD KHATTAK DISTRICT YOUTH OFFICER
CHARSADDA**
2. **SARDAR MUHAMMAD IRFAN DISTRICT YOUTH OFFICER
KHYBER**
3. **JAHANZEB DISTRICT YOUTH OFFICER UPPER DIR**
4. **USMAN KHAN DISTRICT YOUTH OFFICER CHARSADDA**
5. **RAZAULLAH DISTRICT YOUTH OFFICER NORTH
WAZIRISTAN**
6. **ALAMZEB DISTRICT YOUTH OFFICER MANSEHRA**
7. **SHEHZAD TARIQ DISTRICT YOUTH OFFICER LOWER DIR**
8. **SADAM KHAN DISTRICT YOUTH OFFICER BUNER**
9. **FAISAL KHAN DISTRICT YOUTH OFFICER KOHAT**
10. **ADIL KHAN DISTRICT YOUTH OFFICER SWABI**
11. **IRSHAD ULLAH DISTRICT YOUTH OFFICER LAKKI
MARWAT**
12. **IZHARUD DIN DISTRICT YOUTH OFFICER MALAKAND**
13. **ABDUL QADIR DISTRICT YOUTH OFFICER D.I KHAN**
14. **TALAL SALIM DISTRICT YOUTH OFFICER**
15. **FARHAD ALI KHAN DISTRICT YOUTH OFFICER SWAT**
16. **KAMRAN ULLAH DISTRICT YOUTH OFFICER KARAK**
17. **FAHIM JAN DISTRICT YOUTH OFFICER NOWSHERA**
18. **MUHAMMAD ZAHID DISTRICT YOUTH OFFICER HANGU**
19. **FAHIM HAYAT DISTRICT YOUTH OFFICER HARIPUR**
20. **USMAN SAEED DISTRICT YOUTH OFFICER TORGHAR**
21. **BUSHRA MASROR DISTRICT YOUTH OFFICER
ABBOTTABAD**
22. **IFTIKHAR ALI SHAH COMPUTER OPERATOR(BPS 16)**
23. **SHAHZEB COMPUTER OPERATOR(BPS 16)**
24. **SYED SAJID SHAH COMPUTER OPERATOR(BPS 16)**
25. **FAWAD AHMAD COMPUTER OPERATOR(BPS 16)**
26. **ZAHID HUSSAIN COMPUTER OPERATOR(BPS 16)**
27. **MUHAMMAD HARIS COMPUTER OPERATOR(BPS 16)**
28. **JABBAR GHANI COMPUTER OPERATOR(BPS 16)**
29. **ROHUL AMIN COMPUTER OPERATOR(BPS 16)**
30. **FARHADULLAH COMPUTER OPERATOR(BPS 16)**
31. **HAJI AKBAR COMPUTER OPERATOR(BPS 16)**
32. **HAIDER ALI COMPUTER OPERATOR(BPS 16)**
33. **TOOEER AHMAD COMPUTER OPERATOR(BPS 16)**

34. ZABIHULLAH COMPUTER OPERATOR (BPS 16)
35. MUHAMMAD NASER COMPUTER OPERATOR (BPS 16)
36. SAJID KHAN COMPUTER OPERATOR (BPS 16)
37. TAHIR KHALID COMPUTER OPERATOR (BPS 16)
38. ATIFA YOUSAFZAI COMPUTER OPERATOR (BPS 16)
39. SIDRA ARSHAD COMPUTER OPERATOR (BPS 16)
40. NAZIA SHAHEEN COMPUTER OPERATOR (BPS 16) District youth
41. Sardar Muhammad Ifan Ali Computer Operator (BPS-16) District youth
R/SHEWETH: office Abbottabad.

The applicants submit as under:

- 1- That the captioned service appeal is pending adjudication before this Hon'ble tribunal, in which 26-01-2022 is fixed for hearing.
- 2- That appellant has filed the above mentioned service appeal wherein the appellant has challenged/impugned the inaction of the respondents department by not absorbing the appellants as Assistant Director in the Youth Affairs department.
- 3- That as valuable rights of the applicants are attached to the instant appeal, therefore it is essential that they may be impleaded as private respondents in the above mentioned service appeal.
- 4- That in case the above mentioned appeal has been allowed in favour of the appellant then the present applicants would suffer.
- 5- That propriety, fair play and justice demands that the above noted employees be impleaded as party/ private respondents in the above mentioned service appeal.

It is therefore most humbly prayed that on acceptance of this impleadment application the above mentioned party/ employees of the Department may very kindly be impleaded in the array of respondents as private respondents in the above mentioned service appeal.


APPLICANTS
ZUBAIR AHMD & OTHERS

THROUGH:


NOOR MUHAMMAD KHATTAK
ADVOCATE

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO: 7875 OF 2021

Ahmad Zaman (APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Govt of K.P & others (RESPONDENT)
(DEFENDANT)

I/We _____
Do hereby appoint and constitute **NOOR MUHAMMAD KHATTAK Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2021

Sardar Muhammad Irfan Ali.

CLIENTS

ACCEPTED

NOOR MUHAMMAD KHATTAK

KAMRAN KHAN

Sardar
SAID KHAN

Haider Ali
HAIDER ALI

&
KHANZAD GUL
ADVOCATES

S#	District Youth Officers (BPS-17)	Signature
1	Zubair Ahmed Khattak S/o Mukhtiar Ahmed R/o Charsada Currently posted as District Youth Officer Charsada	
2	Sardar Muhammad Irfan Ali S/O Shamroz Khan R/o Phase-1, Hayatabad, House no 29, Street 20, Sector D-4, Peshawar currently posted as District Youth Officer Khyber.	
3	Jahanzeb S/O Muhammad Akram Khan R/O Khal, Tehsil Khal, Upper Dir.	
4	Usman Khan S/O Darvish Khan R/O Bakhtiar abad, PO Kamran Kaly, Mera Prang, Tehsil & District Charsada currently posted as District Youth Officer Charsada.	
5	Raza Ullah S/o Hazrat Umer R/O North Waziristan, District Youth Officer North Waziristan currently posted as District Youth Officer North Waziristan	
6	Alam Zeb S/o Khan Muhammad R/O Mujahidabad, Baffa, District Mansehra currently posted as District Youth Officer Batagram.	
7	Shehzad Tariq S/O Israr Ud Din R/o Gul Abad, Timergara, Lower Dir currently posted as District Youth Officer Lower Dir	
8	Sadam Khan S/o Shehbaz Khan R/O Swabi, District Yotuh Officer Buner	
9	Faisal Khan S/o Obedullah Khan R/O Kotka Mani khan, Tehsil or District Bannu currently posted as District Youth Officer Kohat	
10	Adil Khan S/O Kachkol Khan R/O keshgi, Charsada currently posted as District Youth Officer Swabi	
11	Irshad Ullah S/O Samiullah Jan R/O Salman khel, Tajori, The&Dist Lakki Marwat posted as District Youth Officer Lakki Marwat	
12	Izhar ud din S/O Muhammad Isa Khan R/O Timer Gara, Lower Dir currently posted as District Youth Officer Malakand	
13	Abdul Qadir S/O Shah Jahan R/O Talab Khel FR lakki Marwat currently posted as District Youth Officer Di Khan	
14	Talal Saleem S/O Muhammad Saleem Awan R/O Mansehra currently posted as District Youth Officer Mansehra	
15	Farhad Ali Khan S/O Sardar Ali R/O Kabal, Swat currently posted as District Youth Officer Swat.	
16	Kamran Ullah S/O Gul Diaz Khan Azeem Kala, Tehsil& Distt Bannu currently posted as District Youth Officer Karak	
17	Faheem Jan S/O Muhammad Ibrahim R/o Zareen Abad, The&Distt Charsada currently posted as District Youth Officer Nowshera	
18	Muhammad Zahid S/O Sardar Ali Khan R/O Karak currently posted as District Youth Officer Hangu	
19	Fahim Hayat S/O Nazar Hayat Khan R/O Tank currently posted as District Youth Officer Haripur	
20	Usman Saeed S/O Muhammad Saeed R/O Mansehra currently posted as District Youth Officer Torghar	
21	Bushra Masroor D/O Masroor Ahmed R/O Mansehra currently posted as District Youth Officer Abbottabad	

S#	Computer Operators (BPS-16)	Signature
1	Iftikhar Ali Shah S/O Marifat Shah R/O Mardan currently posted in the Directorate of Youth Affairs Peshawar	
2	Shahzeb S/O Karim Shah R/O Mardan currently posted in the Directorate of Youth Affairs Peshawar.	
3	Syed Sajid Shah S/O Syed Gulab Shah R/O Peshawar currently posted in the District Youth Office Nowshera.	
4	Fawad Ahmad S/O Lal Badshah R/O Bajaur currently posted in the District Youth Office Bajaur.	
5	Zahid Hussain S/O Syed Niaz Ali Shah R/O Mansehra currently posted in the District Youth Office Haripur.	
6	Muhammad Haris S/O Muhammad Sareer R/O Charsada currently posted in the Directorate of Youth Affairs Peshawar.	
7	Jabbar Ghani S/O Gohar Ghani R/O Swabi currently posted in the District Youth Office Swabi.	
8	Rooh-ul-Amin S/O Muhammad Amin R/O Mardan currently posted in the District Youth Office Shangla.	
9	Farhad Ullah S/O Usman Ghani R/O Dir Lower currently posted in the District Youth Office Dir Lower.	
10	Haji Akbar S/O Sher Afzal R/O Malakand currently posted in the District Youth Office Swat.	
11	Haider Ali S/O Gul Shahzada R/O Mingora Swat currently posted in the District Youth Office Malakand.	
12	Touqeer Ahmed S/O Muhammad Khurshheed R/O Abbottabad currently posted in the Mansehra.	
13	Zabih Ullah S/O Muhammad Ali R/O Khyber Agency currently posted in the District Youth Office Charsada.	
14	Muhammad Naser S/O Khad Gul R/O Bannu currently posted in the District Youth Office Tank.	
15	Sajid Khan S/O Akbar Khan R/O Khyber Agency currently posted in the Chitral Lower.	
16	Tahir Khalid S/O Khaliq Dad Awan R/O Haripur currently posted in the District Youth Office Battagram.	
17	Atifa Yousufzai D/O Abdul Wali Khan Yousafzai R/O Shangla currently posted in the Directorate of Youth Affairs Peshawar.	
18	Sidra Arshad Jamil D/O Arshad Jamil R/O Peshawar currently posted in the District Youth Office Peshawar.	
19	Nazia Shaheen W/O Waleed Waheed R/O Abbottabad currently posted in the District Youth Office Abbottabad.	



**GOVERNMENT OF, KHYBER PAKHTUNKHWA,
SPORTS, TOURISM, ARCHAEOLOGY, MUSEUMS
& YOUTH AFFAIRS DEPARTMENT.**

13-A, KHYBER ROAD, PESHAWAR CANTT:



091- 9223448.



091-9212535.



Sportslitigation@gmail.com

NO. SO(LIT)/S&TD/1- 425/2021/Ahmad Zaman
Dated Peshawar the, 26th January, 2022.

To

The Director General Sports,
Khyber Pakhtunkhwa.

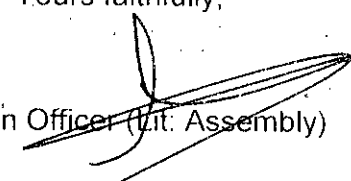
Subject:

**SERVICE APPEAL NO. 7875/2021 TITLED "AHMAD ZAMAN V/S GOVT. OF
KHYBER PAKHTUNKHWA THROUGH SECRETARY SPORTS TOURISM, AND
OTHERS".**

Dear Sir,

I am directed to refer to your Office letter No.1/Court Case/Ahmad Zaman/2021 dated 24-01-2022 & Directorate of Youth Affairs letter N.DYA/ADMN/LIT:2021-22/1953 dated 20-01-2022 on the subject noted above & to return herewith parawise comments on behalf on Respondent No.3 with the request to provide the relevant record/ documents to Directorate of Youth Affairs so that he can prepare joint parawise comments on behalf of all the respondents at the earliest, please.

Yours faithfully,


Section Officer (Lit. Assembly)

Endst: of even No. & dated.

A copy is forwarded for information to the:-

1. PS to Secretary Sports & Tourism Department.
- ✓ 2. Director Youth Affairs Khyber Pakhtunkhwa w/r to letter No. cited above.


Section Officer (Lit. Assembly)



**DIRECTORATE OF YOUTH AFFAIRS
KHYBER PAKHTUNKHWA**

Plot No.28, Sector E-8, Phase-7, Hayatabad Peshawar
Email: info@kpyouthaffairs.gov.pk
Ph: # 091-9219073, 091-9219668

No. DYA/ADMN/LIT:2021-22/ 1759(U-5)

Dated: 20/01/2022

To

The Director General,
Sports Khyber Pakhtunkhwa
Qayum Stadium Peshawar Cantt.

Subject: - **PARA-WISE COMMENTS IN SERVICE APPEAL NO.7875/2021 TITLED AHMAD ZAMAN DISTRICT SPORTS OFFICER MANSEHRA VS: GOVERNMENT OF KHYBER PAKHTUNKHWA AND OTHERS**

Dear Sir,

I am directed to refer to the subject noted above and to state that Mr. Ahmad Zaman District Sports Officer Mansehra has filed Service Appeal No. 7875/2021 in the Khyber Pakhtunkhwa Service Tribunal Peshawar under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1973 for absorption in the Directorate of Youth Affairs Khyber Pakhtunkhwa.

The Registrar Khyber Pakhtunkhwa Service Tribunal has informed that the subject case is fixed for reply in the Service Tribunal on 27-01-2022 and directed the respondents to file para-wise comments on the date fixed. In order to prepare parawise comments in the subject case this directorate needs the following record/documents:-

- i- Advertisement of Public Service Commission for the post of Deputy District Sports Officer BPS-16 through which the appellant was recruited.
- ii- Service Rules for the post of Deputy District Sports Officer BPS-16.
- iii- Appointment order of Mr. Ahmad Zaman District Sports Officer Mansehra as Deputy District Sports officer BPS-16.
- iv- Up-Gradation order of the officer concerned.
- v- Existing Service Rules of Directorate General of Sports Department.
- vi- Copy of letter NO.SO (Sports) 1-6/2021/4404-07 dated 11-03-2021 of Section Officer (Sports) through which the administrative department had solicited view comments of the Director General Sports Khyber Pakhtunkhwa on appeal of the appellant.

It is therefore, humbly requested to kindly furnish the above record to enable this office to prepare and submit the para-wise comments in the court in time.


ASSISTANT DIRECTOR (ADMN/LIT)

Copy forwarded for information to:-

1. The Registrar Service Tribunal Khyber Pakhtunkhwa Peshawar.
2. The Section Officer (Litigation) with reference to his letter No.SO (LIT) S&TD/1-425/2021 Ahmad Zaman/3922-24 dated 12-01-2022.
3. PA to Director Youth Affairs, Khyber Pakhtunkhwa, Peshawar.


ASSISTANT DIRECTOR (ADMN/LIT)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

C.M NO. _____ / 2022

IN

APPEAL No.7875/2021

Ahmad Zaman

VS

Government of KPK

APPLICATION FOR IMPLEADMENT OF THE BELOW MENTIONED YOUTH OFFICERS(BPS-17) AND COMPUTER OPERATORS (BPS-16) POSTED IN THE OFFICE OF RESPONDENT NO.4 IN THE ARRAY OF RESPONDENTS AS PRIVATE RESPONDENTS IN THE ABOVE TITLED APPEAL.

1. **ZUBAIR AHMAD KHATTAK DISTRICT YOUTH OFFICER CHARSADDA**
2. **SARDAR MUHAMMAD IRFAN DISTRICT YOUTH OFFICER KHYBER**
3. **JAHANZEB DISTRICT YOUTH OFFICER UPPER DIR**
4. **USMAN KHAN DISTRICT YOUTH OFFICER CHARSADDA**
5. **RAZAULLAH DISTRICT YOUTH OFFICER NORTH WAZIRISTAN**
6. **ALAMZEB DISTRICT YOUTH OFFICER MANSEHRA**
7. **SHEHZAD TARIQ DISTRICT YOUTH OFFICER LOWER DIR**
8. **SADAM KHAN DISTRICT YOUTH OFFICER BUNER**
9. **FAISAL KHAN DISTRICT YOUTH OFFICER KOHAT**
10. **ADIL KHAN DISTRICT YOUTH OFFICER SWABI**
11. **IRSHAD ULLAH DISTRICT YOUTH OFFICER LAKKI MARWAT**
12. **IZHARUD DIN DISTRICT YOUTH OFFICER MALAKAND**
13. **ABDUL QADIR DISTRICT YOUTH OFFICER D.I KHAN**
14. **TALAL SALIM DISTRICT YOUTH OFFICER**
15. **FARHAD ALI KHAN DISTRICT YOUTH OFFICER SWAT**
16. **KAMRAN ULLAH DISTRICT YOUTH OFFICER KARAK**
17. **FAHIM JAN DISTRICT YOUTH OFFICER NOWSHERA**
18. **MUHAMMAD ZAHID DISTRICT YOUTH OFFICER HANGU**
19. **FAHIM HAYAT DISTRICT YOUTH OFFICER HARIPUR**
20. **USMAN SAEED DISTRICT YOUTH OFFICER TORGHAR**
21. **BUSHRA MASROR DISTRICT YOUTH OFFICER ABBOTTABAD**
22. **IFTIKHAR ALI SHAH COMPUTER OPERATOR(BPS 16)**
23. **SHAHZEB COMPUTER OPERATOR(BPS 16)**
24. **SYED SAJID SHAH COMPUTER OPERATOR(BPS 16)**
25. **FAWAD AHMAD COMPUTER OPERATOR(BPS 16)**
26. **ZAHID HUSSAIN COMPUTER OPERATOR(BPS 16)**
27. **MUHAMMAD HARIS COMPUTER OPERATOR(BPS 16)**
28. **JABBAR GHANI COMPUTER OPERATOR(BPS 16)**
29. **ROHUL AMIN COMPUTER OPERATOR(BPS 16)**
30. **FARHADULLAH COMPUTER OPERATOR(BPS 16)**
31. **HAJI AKBAR COMPUTER OPERATOR(BPS 16)**
32. **HAIDER ALI COMPUTER OPERATOR(BPS 16)**
33. **TOQEER AHMAD COMPUTER OPERATOR(BPS 16)**

34. ZABIHULLAH COMPUTER OPERATOR(BPS 16)
35. MUHAMMAD NASER COMPUTER OPERATOR(BPS 16)
36. SAJID KHAN COMPUTER OPERATOR(BPS 16)
37. TAHIR KHALID COMPUTER OPERATOR(BPS 16)
38. ATIFA YOUSAFZAI COMPUTER OPERATOR(BPS 16)
39. SIDRA ARSHAD COMPUTER OPERATOR(BPS 16)
40. NAZIA SHAHEEN COMPUTER OPERATOR(BPS 16)

41. *Sardar Muhammad Iqbal Ali Computer Operator (BPS-16) District You*
R/SHEWETH: *Office Abbadabad.*

The applicants submit as under:

- 1- That the captioned service appeal is pending adjudication before this Hon'ble tribunal, in which 26-01-2022 is fixed for hearing.
- 2- That appellant has filed the above mentioned service appeal wherein the appellant has challenged/impugned the inaction of the respondents department by not absorbing the appellants as Assistant Director in the Youth Affairs department.
- 3- That as valuable rights of the applicants are attached to the instant appeal, therefore it is essential that they may be impleaded as private respondents in the above mentioned service appeal.
- 4- That in case the above mentioned appeal has been allowed in favour of the appellant then the present applicants would suffer.
- 5- That propriety, fair play and justice demands that the above noted employees be impleaded as party/ private respondents in the above mentioned service appeal.

It is therefore most humbly prayed that on acceptance of this impleadment application the above mentioned party/ employees of the Department may very kindly be impleaded in the array of respondents as private respondents in the above mentioned service appeal.

APPLICANTS

ZUBAIR AHMED & OTHERS

THROUGH:

**NOOR MUHAMMAD KHATTAK
ADVOCATE**