

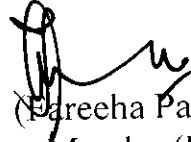
ORDER

21st Sept 2022

1. Appellant alongwith his counsel present. Mr. Muhammad Jan, District Attorney for official respondents No. 1 to 5 and clerk to counsel for private respondent No.6 to 34 present.
2. Vide our consolidated judgment of today in connected service appeal No. 336/2018 titled "Muazzam Ali-vs-Govt: of Khyber Pakhtunkhwa Secretary Food, Peshawar", this appeal is also dismissed. Costs shall follow the event. Consign.
3. *Pronounced in open court in Abbottabad and given under our hands and seal of the Tribunal on this 21st day of Sept, 2022.*



(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad



(Fareeha Paul)
Member(E)
Camp Court Abbottabad

20th July 2022

Appellant in person present. Mr. Noor Zaman Khattak, District Attorney alongwith Mr. Arshad Farooq, Asst: Deputy Director Food for respondents present.

P
Appellant seeks adjournment on the ground that his counsel is not available today. Last chance is given to the appellant to procure attendance of his counsel to argue this appeal failing which the appeal will be decided on the available record without arguments. To come up for arguments on 21.09.2022 before D.B at camp court Abbottabad.



(Salah Ud Din)
Member (Judicial)



(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

27th April, 2022

None present on behalf of the appellant. Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

File to come up alongwith connected Service Appeal No. 336/2018 titled Muazzam Ali Versus Government, before the D.B at Camp Court, Abbottabad on 17.05.2022. Notice be also issued to the appellant and his counsel for the date fixed.



(Fareeha Paul)
Member (E)



Chairman

17.05 2022

Appellant in person present. Mr. Muhammad Asif Masood, Deputy District Attorney alongwith Mr. Shad Muhammad, DFC for respondents present.

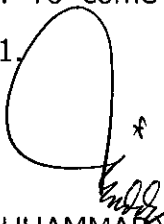
Appellant seeks adjournment on the ground that his counsel is not available today. Adjourned but as a last chance. To come up for arguments on 20.07.2022 before D.B at camp court Abbottabad.



(Fareeha Paul)
Member(E)


(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

13.09.2021

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for official respondents No.1 to 5 present. Clerk of learned counsel for Private respondents present and requested for adjournment that counsel for private respondents is not available today. Adjourned. To come up for arguments before the D.B on 18.10.2021.


(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)



(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


18.10.2021

Appellant present through representative.

Muhammad Riaz Khan Paindakheil learned Assistant Advocate General for respondents present.

Lawyers are on general strike, therefore, case is adjourned. To come up for arguments on 13.01.2022 before D.B.



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


(Rozina Rehman)
Member (J)

13.01.2022

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

Due to paucity of time arguments could not be heard. To come up for arguments on 27.04.2022 before the D.B.


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

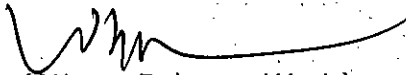

Chairman


19.10.2020

Representative of appellant on behalf of appellant present.

Usman Ghani learned District Attorney alongwith Shaukat Zaman Assistant for respondents present.

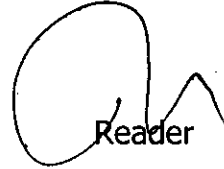
Lawyers are on general strike therefore case is adjourned. To come up for arguments on 14.12.2020 before D.B at Camp Court, Abbottabad.


(Atiq ur Rehman Wazir)
Member (E)
Camp Court, A/Abad


(Rozina Rehman)
Member (J)
Camp Court, A/Abad

14.12.2020

Due to Covid-19, case is adjourned to 15.03.2021 for the same as before.



Reader


15.03.2021

Nemo for appellant.

Riaz Khan Paindakheil learned Assistant Advocate General alongwith Intiaz Muhammad Khan Divisional Assistant Director for respondents present.

Preceding date was adjourned on a Reader' note, therefore, appellant/counsel be put on notice for 16/06/2021 for arguments, before D.B at Camp Court, Abbottabad.


(Atiq ur Rehman Wazir)
Member (E)
Camp Court, A/Abad



(Rozina Rehman)
Member (J)
Camp Court, A/Abad

17.12.2019

Appellant in person and Mr. Usman Ghani, District Attorney alongwith Mr. Shoukat Zaman, Assistant for the respondents present. Appellant requested for adjournment on the ground that his counsel is not available today. Adjourned to 23.01.2020 for arguments before D.B at Camp Court Abbottabad.


(Hussain Shah)

Member
Camp Court Abbottabad



(M. Amin Khan Kundi)
Member
Camp Court Abbottabad

23.01.2020

Clerk to counsel for the appellant present. Mr. Muhammad Jan, DDA for the respondents present. Due to general strike of the bar on the call of Khyber Pakhtunkhwa Bar Council, the case is adjourned. To come up for further proceedings on 18.02.2020 before D.B at camp court Abbottabad. Appellant be put on notice for the date fixed.


Member



Member
Camp Court A/Abad

18/2/21

Due to covid ,19 case to come up for the same on 14 / 4 / 19
at camp court abbottabad.


Reader


10 / 20 Due to summer vacation case to come up for the same on 1 / 19
at camp court abbottabad.


Reader

20.08.2019

Counsel for the appellant present. Mr. Muhammad Bilal learned Deputy District Attorney for respondents present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 23.10.2019 before D.B at camp court Abbottabad.

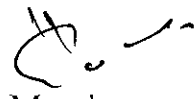

Member


Member
Camp Court A/Abad

23.10.2019


Appellant in person present. Mr. Usman Ghani, District Attorney alongwith Rashid Mehmood, Supdt for official respondents and private respondent no.22 in person as well as for other private respondents present. Appellant submitted rejoinder which is placed on file. Adjourn. To come up for arguments on 17.12.2019 before D.B at Camp Court, Abbottabad.


Member


Member
Camp Court Abbottabad


17.04.2019

Counsel for the appellant present. Mr. Muhammad Bilal, DDA alongwith Mr. Shoukat Zaman, Assistant for official respondents no. 1 to 5 present. Wakalant Nama of Mr. Khushdil Khan, Advocate on behalf of private respondents submitted and seeks time to submit written reply/comments. ~~Case to come up for written reply/comments on behalf of private respondents.~~ Case to come up for written reply/comments on 19.06.2019 before S.B at camp court Abbottabad.


(Ahmad Hassan)
Member
Camp Court A/Abad

19.06.2019

Appellant in person and Mr. Muhammad Bilal, DDA alongwith Mr. Shoukat Zaman, Assistant for official respondents present. Clerk to counsel for private respondents present and submitted written reply/comments which ~~is~~ placed on file. Case to come up for rejoinder and arguments on 20.08.2019 before D.B at camp court Abbottabad.


(Ahmad Hassan)
Member
Camp Court A/Abad

21.12.2018

Mr. Muhammad Zubair Khan Jadoon, Advocate for appellant present.

Learned counsel for the appellant contends that the appellant was appointed in pursuance to advertisement dated 11.10.2016 while there was a separate advertisement for recruitment of Food Grain Supervisors but in District Chitral only. The respondent department, however, preferred to issue a combined seniority list for the whole Province whereby some of the juniors became senior to the appellant.


In view of the above the instant appeal is admitted for regular hearing. The appellant is directed to deposit ~~of~~ security and process fee within 10 days. Thereafter notices be issued to the respondents for submission of written reply/comments on 19.02.2019 before the S.B at Camp Court, Abbottabad.

Appellant Deposited
Security & Process Fee

Chairman
Camp Court, A/Abad


19.02.2019

Appellant in person present. Mr. Muhammad Bilal Khan, Deputy District Attorney alongwith Mr. Imtiaz Ahmad Khan, Director for official respondents No. 1 to 5 and private respondents No. 22 & 26 in person present. Written reply on behalf of official respondents No. 1 to 5 submitted. Written reply on behalf of private respondents not submitted and requested for further adjournment. Adjourned. To come up for written reply/comments on behalf of private respondents on 17.04.2019 before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

19.09.2018


Since 21st September, 2018 has been declared as public holiday on account of Moharram, therefore, case is adjourned to 16.11.2018 for preliminary hearing before the S.B. at camp court, Abbottabad.


Chairman
Camp court, A/Abad

81-2-15
81-2-15
A/A

16.11.2018





Clerk to Counsel for the appellant present. Due to retirement of the Hon'ble Chairman Service Tribunal is incomplete. Tour to Camp Court Abbottabad has been cancelled. To come up for the same on 21.12.2018 at camp court Abbottabad.


Reader
A/Abad

Form-A
FORM OF ORDERSHEET

Court of _____

Case No. 337/2018

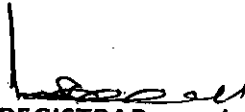
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	08/03/2018	<p>The appeal of Mr. Muhammad Shoaib Lodhi resubmitted today by Mr. Muhammad Zubair Khan Jadoon Advocate may be entered in the Institution Register and put up to Learned Member for proper order please.</p> <p style="text-align: right;"> REGISTRAR 8/3/2018</p>
2-	27-3-18	<p>This case is entrusted to Touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>29-6-18</u>.</p> <p style="text-align: right;"> MEMBER</p>
29.06.2018		<p>Mr. Amir Shehzad, clerk to counsel for the appellant present. Clerk to counsel for the appellant made a request for adjournment that counsel for the appellant is not available today. Granted. To come up for preliminary hearing on 21.09.2018 before S.B at camp court, Abbottabad.</p> <p style="text-align: right;"> Chairman Camp court, A/Abad</p>

The appeal of Mr. Muhammad Shoaib Lodhi Food Grain Supervisor Mansehra received today i.e. on 22.02.2018 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ① Addresses of respondent nos. 2 to 4 are incomplete which may be completed according to Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Annexure-B of the appeal is missing.
- 3- Copy of impugned seniority list mentioned in para-5 of the memo of appeal (Annexure-E) is not attached with the appeal which may be placed on it.
- 4- Sub-rule-4 of rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974 requires that every civil servant to whom the relief claimed may affect shall be shown as respondent.
- ⑤ Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent may also be submitted with the appeal.

No. 389 /S.T,

Dt. 23/02 /2018


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. M.Zubair Khan Jadoon Adv.
High Court Abbottabad.

Respected Sir,

All the objections are overruled. As per
directions the deficiencies are removed
one by one. - (Muhammad Zubair Khan Jadoon
Counsel for petitioner)


Muhammad Zubair Khan Jadoon
Advocate
High Court Abbottabad

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

Service Appeal No. 337 /2018

Muhammad Shoab Lodhi Food Grain Supervisor, Mansehra.

....APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa Secretary Food Peshawar & others.

....RESPONDENTS

SERVICE APPEAL

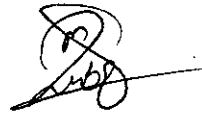
INDEX

S.#	Description	Page No.	Annexure
1.	Service appeal along with affidavit	1 to 10	
2.	Copies of advertisement of Food grain	11 to 12	"A"
3.	Copy of the impugned seniority list	13 to 14	"B"
4.	Copy of appointment order	15	"C"
5.	Copies of appeal & order	16 to 19	"D" & "E"
6.	Wakalatanama		

.....APPELLANT

Through

Dated: _____ /2018



(Muhammad Zubair Khan Jadoon)
Advocate High Court, Abbottabad

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. 337 /2018

Muhammad Shoab Lodhi Food Grain Supervisor, Mansehra.

....**APPELLANT**
Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Diary No. 263

Dated 22/2/2018

1. Government of Khyber Pakhtunkhwa Secretary Food Peshawar.
2. Director Food Directorate of Food KPK, Peshawar.
3. Deputy Director Food (A&C) Food Directorate, KPK Peshawar.
4. Divisional Assistant Director Food Hazara Division, Abbottabad.
5. District Food Controller Mansehra.
6. Shabir Ahmed, Food Grain Supervisor, District Food Controller Chitral.
7. Khalida Food Grain Supervisor. — do —
8. Muhyu Din, Food Grain Supervisor. — do —
9. Farooq Ahmed, Food Grain Supervisor. — do —
10. Aftab Hussain, Food Grain Supervisor. — do —
11. Muhammad Manzoor ul Haq, Food Grain Supervisor. — do —
12. Israr ud Din Ahmad, Food Grain Supervisor. — do —
13. Muhammad Riaz Ullah, Food Grain Supervisor. — do —
14. Syed Jehangir Shah, Food Grain Supervisor. — do —
15. Imtiaz Hussain Shah, Food Grain Supervisor. — do —
16. Sarwar, Food Grain Supervisor. — do —
17. Afida Sultan, Food Grain Supervisor. — do —

Filed to-day

Registrar

22/2/18

Re-submitted to-day
and filed.

Registrar 2/3/18

18. Naveed Ahmad, Food Grain Supervisor, District Food Controller Chitral.
19. Muhammad Zubair, Food Grain Supervisor. — do —
20. Sajad Ali, Food Grain Supervisor. — do —
21. Muhammad Zubair, Food Grain Supervisor. — do —
22. Sajad Ali, Food Grain Supervisor. — do —
23. Muhammad Riaz, Food Grain Supervisor. — do —
24. Islah ud Din, Food Grain Supervisor. — do —
25. Saira Bibi, Food Grain Supervisor. — do —
26. Muhammad Shahab, Food Grain Supervisor. — do —
27. Habib Ullah, Food Grain Supervisor. — do —
28. Syed karam Ali Shah, Food Grain Supervisor. — do —
29. Suhail Ahmad, Food Grain Supervisor. — do —
30. Shair Azeem, Food Grain Supervisor. — do —
31. Ihtisham Ul Haq, Food Grain Supervisor. — do —
32. Zaina, Food Grain Supervisor. — do —
33. Nadir Wali Khan, Food Grain Supervisor. — do —
34. Mansoor Wali Shah, Food Grain Supervisor. — do —

(Respondents No. 6 to 34 Care of District Food Controller Chitral).

....RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF
KPK SERVICE TRIBUNAL ACT, 1974, FOR
DECLARATION TO THE EFFETE THAT THE
APPELLANT HAS BEEN APPOINTED AS

FOOD GRAIN SUPERVISOR BPS-7 & HAS BEEN PLACED JUNIORS TO THE APPOINTEES OF DISTRICT CHITRAL VIDE SENIORITY LIST DATED 20/12/2017 WHICH SHOULD HAVE BEEN FINALIZED KEEPING IN VIEW THE ORDER OF MERIT OF APPOINTMENT. BESIDES, SENIORITY OF FOOD GRAIN SUPERVISOR BPS-7 IS TO BE MAINTAINED HAS BEEN MAINTAINED AT PROVINCIAL LEVEL WHICH AS PER LAW & ORDER OF MERIT OF APPOINTMENT, HENCE THE IMPUGNED SENIORITY LIST DATED 20/12/2017 IS AGAINST THE LAW AND ORDER OF MERIT OF AND THE SAME IS LIABLE TO BE SET ASIDE.

PRAYER: ON ACCEPTANCE OF INSTANT APPEAL, THE IMPUGNED SENIORITY LIST DATED 20/12/2017 MAY BE SET ASIDE and THEREAFTER SENIORITY LIST OF THE APPELLANT MAY BE REVISED. ANY OTHER RELIEF WHICH HONOURABLE TRIBUNAL DEEM FIT AND APPROPRIATE IN THE CIRCUMSTANCES OF THE CASE.

Respectfully Sheweth: -

1. That respondent department advertised the post of Food grain supervisor BPS-7 for the entire KP vide dated 11/10/2016 and thereafter another advertisement for the appointment of Food grain supervisor BPS-7 for District Chitral only issued by respondents on 14/10/2016. Copies of advertisement of Food grain is attached as Annexure "A".
2. That the appellant alongwith candidates of Chitral applied for the said post and qualified test and interview.
3. That respondent No. 2 instead of issuing of joint appointment orders of all the candidates on one date and time according to the order of merit, But instead of following the law respondents No. 2 issued order of 26 candidates of Chitral on 16/02/2017. Copy of the impugned seniority list is attached as Annexure "B".

4. That the respondent department issued appointment order of the appellant after 26 days of the appointment of the candidates of District Chitral is issued appointment order of the appellant vide order of the appellant dated 13/03/2017. Copy is order is attached as Annexure "C".
5. That thereafter, the appellant came to know that the candidates of District Chitral of the same badge have been appointed one month prior to the date of appointment of the appellant. Copy of the impugned Seniority list already attached as Annexure "D".
6. That feeling aggrieved, the appellant filed departmental appeal before the competent authority for rectification/ reconciliation of the seniority list on the basis of order of merit on 28/12/2017 which was rejected by vide rejection order dated 24/01/2018. Copies of appeal & order are attached as Annexure "E" & "F", Hence feeling

aggrieved, the instant service appeal is filed inter-alia on the following grounds:-

GROUND:-

- a. That impugned seniority list is against the law, discriminatory, perverse, against the service laws, and against the principles of law settled by the superior courts, hence, the impugned seniority list is liable to be set and revised seniority list is to be issued keeping in view the laws on the subject.

- b. That the respondent department with malafide intentions just to spoil the career of appellant, issued the appointment orders of the candidates of District Chitral one month prior to the appointment of the appellant. As per article 25 of the constitution of Islamic Republic of Pakistan Act, 1973 each and every person is equal before law and no discrimination on

the basis of color, creed and locality be made. Therefore, appointment order of the candidates of District Chitral issued by respondent No.2 dated 16/02/2017 is absolutely against the law.

- c. That as per service rules, seniority of employees in BPS-7 including the food grains supervisor BPS-7 is maintained either at District level and in some cases is at Divisional level. If in case, seniority of the appellant is fixed at district or Divisional level, then, no grievance of the appellant arises. Here in this case, respondent department without adhering to the service rules issued impugned seniority list showing the candidates of Chitral at the top of the seniority list is void ab-initio. Because no law/ rules exists wherein the candidates of particular area is given priority/ preference while fixing of the seniority of their appointment.

- d. That there is no cavil with the proposition that the seniority is always fixed on the thumb rule i.e order of merit. Irrespective of the fact that one take over the charge first or otherwise. It is also note worthy that the food grains supervisors selected from the District Chitral and the appellant has been selected out of the same badge. Therefore, seniority of the appellant and the candidate of Chitral is to be issued on the basis of merit keeping in view their marks in the final merit list visa viz the marks of the candidates from Chitral who have illegally been shown senior from the appellant.
- e. That in case seniority of FGS so appointed in not differentiate on the basis of appointed in Chitral having domicile condition with other FGS of rest of the province having zone wise criteria, in future on promotion to next stage i.e on post of Food grain inspector in the entire province KPK

most candidates will be from District Chitral as there is a large number of posts of FGS in District Chitral as compared to rest of the Province means fresh candidates in Chitral will be appointed and on promotion will be expanded in rest of the province.

- f. That the candidates of District Chitral has already been given are benefit i.e appointment in their own District, Hence, the other benefit at the same time cannot be given so as to deprive the appellant from his seniority.
- g. That no other efficacious, speedy and adequate remedy is available to appellant except to the file instant appeal.
- h. That the other points shall be urged at the time of arguments.

It is, therefore, humbly prayed that on acceptance of instant appeal is impugned seniority list dated 20/12/2017 may be set aside thereafter seniority list of the appellant may be revised. Any other relief which deem fit and appropriate in the circumstances of the case.



....APPELLANT

Through

Dated: _____/2018



(Muhammad Zubair Khan Jadoon)
Advocate High Court, Abbottabad

VERIFICATION:-

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



...APPELLANT

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

Service Appeal No. _____/2018

Muhammad Shoab Lodhi Food Grain Supervisor, Mansehra.

....APPELLANT

VERSUS

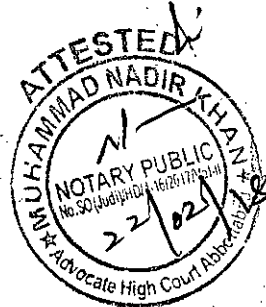
Government of Khyber Pakhtunkhwa Secretary Food Peshawar & others.

....RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Muhammad Shoab Lodhi Food Grain Supervisor, Mansehra, do hereby solemnly affirm and declare that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Tribunal.




DEPONENT

Food Directorate KPK Jobs 2016 Clerks & Supervisors Latest Advertisement Job Ad shown on this page is taken from Express Newspaper on 11-10-2016

Applications are invited from suitable candidates holding Pakistani Citizenship and having domicile of the relevant Zones for the vacant posts of Junior Clerk (BS-11) and Foodgrain Supervisor (BPS-07) in Food Department Khyber Pakhtunkhwa as per detail given below:-

S.No.	Name of Post & Scale	No. of Posts	No of posts in each Quota / Zone		Qualification/Experience	Age Limit
			Female Quota	Disble Quota		
1	Junior Clerk (BPS-11)	25	Female Quota	08	Matriculation equivalent qualification from a recognized Board with typing speed of 30 words per minute.	18-30
			Disble Quota	01		
			Minority Quota	01		
			Zone-I	06		
			Zone-III	03		
			Zone-IV	05		
2	Foodgrain Supervisor (BPS-07)	14	Female Quota	02	Matriculation equivalent qualification from a recognized Board	18-30
			Zone-I	03		
			Zone-II	03		
			Zone-III	02		
			Zone-IV	01		
			Zone-V	03		

Term & conditions

- 1) Application forms and other details are available at NTS Website, www.nts.org.pk, which must be read carefully before applying for the aforesaid posts.
- 2) NTS will charge Rs.450 / per application from the candidates as Test Processing Fee for the whole process. Fee can be submitted through prescribed Fee Slip in any online Branch of HBL, UBL, ABL and MCB of Khyber Pakhtunkhwa.
- 3) Form should be filled in carefully by the candidates as the provided information will be considered as final for further processing.
- 4) Not fulfilling any of the statements written in the application form will automatically exclude the candidate from the whole process.
- 5) Original Bank Slip and attested photocopies of all academic and experience certificates should be attached with the application form at the time of submission.
- 6) NTS Test will serve for short listing/screening purpose only. Post Test process will be performed by the Food Department Khyber Pakhtunkhwa itself, as per prescribed procedure.
- 7) After their appointment, the selected candidates could be posted any where in Khyber Pakhtunkhwa.
- 8) The competent authority reserves the right to change any condition, increase / decrease the number of vacancies or cancel the recruitment process by assigning valid reasons.
- 9) Only short listed candidates shall be called for interview.
- 10) No TA / DA shall be paid for test/interview.
- 11) The inservice candidates of Government / Semi Government Departments / Organizations are required to...

Ver. hand
 Muhammad Zubair Khan Jadoon
 Advocate
 High Court Abbottabad

Motorway Police Jobs (500+ Posts)
 FPSC Jobs (556+ Posts)

Atomic Energy Jobs (Multiple Posts)
 POF Jobs (69+ Posts)

Pak Army Jobs (Commission / Civilian)
 PPSC Jobs (Multiple Posts)

Foodgrain Supervisor Jobs in Food Department KPK 2016 October NTS Application Form Download Latest

NEWS 14-Oct-2016 (Friday) in The News Share This Ad With Your Friends     


Positions: 29 Foodgrain Supervisors (BPS-07) City: Jobs in Chitral, Jobs in KPK

The 123rd Canton Fair

Register today to open up a world of new business opportunities & get 500RMB! invitation.cantonfair.org.cn

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Minimally Injured After Jaboon
High Court Abbottabad

Deploy Chrome at work!



DEPLOY NOW

FOOD DIRECTORATE, KHYBER PAKHTUNKHWA PESHAWAR

APPLICATIONS REQUIRED

Applications are invited from suitable candidates holding Pakistani Citizenship and having domicile of District Chitral for the following vacant posts of Foodgrain Supervisor (BPS-07) in Food Department Khyber Pakhtunkhwa:-

S.No.	Name of Post & Scale	No. of Posts	No of posts in each Area of PRC of District Chitral	Qualification/Experience	Age Limit	
	Foodgrain Supervisor (BPS-07)	29	Female Quota	03	Matriculation or equivalent qualification from a recognized Board	18-30
			Disable Quota	01		
			Minority Quota	01		
			Arandu, Domel, Drosh, Ursoon, Madaklasht, Bumburat, Shoghore, Susoani, Arkari, Luikoh, Gobore, Gellen, Kuragh, Mastuj, Laspuro, Yarkhoon, Broghil, Oveer, Gohkir, Koshi, Mulkoh, Kushum, Terich, Torkoh, Itch and Khot			

Term & conditions:






- Application forms and other details are available at NTS Website, www.nts.org.pk. which must be read carefully before applying for the aforesaid posts.
- NTS will charge Rs.450 / per application from the candidates as Test Processing Fee for the whole process. Fee can be submitted through proscribed Fee Slip in any online Branch of HBL, UBL, ABL and MCB of Khyber Pakhtunkhwa.
- Form should be carefully filled in by the candidates because the provided information will be considered as final for further processing.
- Not fulfilling any of the statements written in the application form will automatically exclude the candidate from the whole process.
- Original Fee Slip and attested photocopies of all academic and experience certificates should be attached with the application form at the time of submission.
- NTS Test will serve for short listing/screening purpose only. Post test process will be performed by the Food Department Khyber Pakhtunkhwa itself vis-a-vis the shortlisted candidates as per proscribed procedure.
- Preference will be given to the candidate(s) hailing from the Union Councils where these Provincial Reserved Centres are located.
- The competent authority reserves the right to change any condition, increase/decrease the number of vacancies or cancel the recruitment process by assigning valid reasons.
- Only short listed candidates for a particular Provincial Reserve Centre or against a proscribed reserved quota shall be called for interview.
- No TA/DA shall be paid for test/interview.
- The in service candidates of Government/ Semi Government Departments / Organizations are required to apply through proper channel.
- The candidates shall have to apply for the post (s) within 15 days of the requisite publication.
- The quota reserved for females / disabled/minority shall be on open merit within District Chitral.

For further information, candidates may please contact NTS at 051-8444441

DIRECTOR FOOD KHYBER PAKHTUNKHWA PESHAWAR

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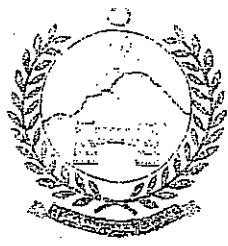
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13

ANNEXURE - B

PC

برسرہ



verified
Muhammad Zubair Khan Jadoon
Advocate
High Court Abbottabad

GOVERNMENT OF KHYBER PAKHTUNKHWA,
DIRECTORATE OF FOOD,
PESHAWAR

No. 5399 /ET-716

Dated Peshawar, the 7th /December, 2017

verified
Muhammad Zubair Khan Jadoon
Advocate
High Court Abbottabad

NOTIFICATION

In pursuance to Rule-17 of the Khyber Pakhtunkhwa Government Servants (Appointment, Promotion and Transfer) Rules 1989, the competent authority has been pleased to notify the Seniority List of Foodgrain Supervisors (BS-07) in Food Directorate Khyber Pakhtunkhwa, Peshawar as it stood on 14-12-2017.

S.No	Name of Govt. Servant	Qualification	Date of Birth	Domicile	Date of entry into Govt. Service	Date of appointment to the Present Post	Method of Recruitment / Appointment	Date of Superannuation
1.	Muhammad Ali Yousaf	B.Sc	22-08-1987	D.I.Khan	03-05-2012	03-05-2012	By initial recruitment	21-08-2047
2.	Zakir Bilal	Metric	24-02-1997	Bannu	13-04-2016	18-04-2016	By initial recruitment	23-02-2057
3.	Sher Ayub	MA	01-12-1987	Chitral	18-04-2016	18-04-2016	By initial recruitment	30-11-2047
4.	Miss Shaista Naz	Metric	10-01-1992	Peshawar.	18-04-2016	18-04-2016	By initial recruitment	09-01-2052
5.	Muhammad Atif	Metric	02-03-1998	Peshawar.	10-01-2017	10-01-2017	By initial recruitment	01-03-2049
6.	Shabir Ahmad	MSc (Economic)	09-11-1966	Chitral	16-02-2017	16-02-2017	By initial recruitment	08-11-2046
7.	Khalida	MSc (Statistic)	07-01-1987	Chitral	16-02-2017	16-02-2017	By initial recruitment	06-01-2046
8.	Muhyu Din	M.A (Islamiyat)	12-02-1987	Chitral	16-02-2017	16-02-2017	By initial recruitment	11-02-2047
9.	Farooq Ahmad	MBA	01-09-1987	Chitral	16-02-2017	16-02-2017	By initial recruitment	30-08-2047
10.	Aftab Hussain	MBA (Finance)	01-03-1988	Chitral	16-02-2017	16-02-2017	By initial recruitment	30-02-2048
11.	Muhammad Manzoor ul Haq	MA (English)	15-07-1988	Chitral	16-02-2017	16-02-2017	By initial recruitment	14-07-2048
12.	Israr ud Din Ahmad	M.A	10-11-1988	Chitral	16-02-2017	16-02-2017	By initial recruitment	09-11-2048
13.	Muhammad Riaz Ullah	MA (Political Science)	01-01-1990	Chitral	16-02-2017	16-02-2017	By initial recruitment	31-12-2050
14.	Syed Jehangir Shah	M.A (Economic)	12-02-1990	Chitral	16-02-2017	16-02-2017	By initial recruitment	11-02-2050
15.	Imtiaz Hussain Shah	MSc (Physiology)	14-02-1990	Chitral	16-02-2017	16-02-2017	By initial recruitment	13-02-2050
16.	Sarwar	MSc (Economic)	25-02-1990	Chitral	16-02-2017	16-02-2017	By initial recruitment	24-02-2050
17.	Afida Sultan	M.A (English)	30-03-1990	Chitral	16-02-2017	16-02-2017	By initial recruitment	29-03-2050
18.	Naveed Ahmad	M.A (Economic)	05-02-1991	Chitral	16-02-2017	16-02-2017	By initial recruitment	04-02-2051
19.	Muhammad Zubair	MLIS	01-10-1991	Chitral	16-02-2017	16-02-2017	By initial recruitment	30-09-2051
20.	Sajad Ali	B.S (Sociology)	08-10-1991	Chitral	16-02-2017	16-02-2017	By initial recruitment	07-10-2051
21.	Muhammad Riaz	M.Com	01-02-1992	Chitral	16-02-2017	16-02-2017	By initial recruitment	31-01-2052
22.	Islah ud Din	M.A(Physical Educ.)	15-10-1992	Chitral	16-02-2017	16-02-2017	By initial recruitment	14-10-2052
23.	Saira Bibi	M.A Physics	07-10-1992	Chitral	16-02-2017	16-02-2017	By initial recruitment	06-10-2052

(14) (17)

25.	Habib Ullah	B.Com	03-01-1990	Chitral	16-02-2017	16-02-2017	By initial recruitment	02-01-2050
26.	Syed Karam Ali Shah	BSc	06-06-1992	Chitral	16-02-2017	16-02-2017	By initial recruitment	05-06-2052
28.	Suhail Ahmad	B.A	30-05-1994	Chitral	16-02-2017	16-02-2017	By initial recruitment	29-05-2054
28.	Shair Azeem	BSc	10-06-1994	Chitral	16-02-2017	16-02-2017	By initial recruitment	29-05-2052
29.	Ihtisham Ul Haq	B.A	10-06-1994	Chitral	16-02-2017	16-02-2017	By initial recruitment	09-06-2054
30.	Zaina	MA (Political Science)	05-03-1988	Chitral	16-02-2017	16-02-2017	By initial recruitment	04-03-2048
31.	Nadir Wali Khan	M. Com	10-01-1990	Chitral	16-02-2017	16-02-2017	By initial recruitment	09-01-2050
32.	Mansoor Wali Shah	MSc (Comp: Science)	15-06-1990	Chitral	16-02-2017	16-02-2017	By initial recruitment	14-06-2050
33.	Mr. Naseeb Khan	MA (Political Science)	19-05-1986	Khyber Agency	13-03-2017	13-03-2017	By initial recruitment	18-05-2046
34.	Qazi Junaid Bacha	M.Com (Managmt: Finance)	03-01-1987	Mardan	13-03-2017	13-03-2017	By initial recruitment	02-01-2047
35.	Mujeeb ur Rehman	BSc (Hons)	05-01-1987	Bajour Agency	13-03-2017	13-03-2017	By initial recruitment	04-01-2047
36.	Mauzzam Ali	MBA (Finance)	22-02-1989	Abbottabad	13-03-2017	13-03-2017	By initial recruitment	21-02-2049
37.	Mr. Gohar Zaman	BS (Hons-Biotechnology)	12-04-1989	FR Bannu	13-03-2017	13-03-2017	By initial recruitment	11-04-2049
38.	Mr. Azam Khan	BS (Hons-Biotechnology)	20-08-1989	Dir Lower	13-03-2017	13-03-2017	By initial recruitment	19-08-2049
39.	Muhammad Shoab Lodhi	MSc (Economic)	25-10-1989	Abbottabad	13-03-2017	13-03-2017	By initial recruitment	24-10-2049
40.	Syed Zeeshan Mubarak	BS (Hons) Chemistry	16-11-1989	Mansehra	13-03-2017	13-03-2017	By initial recruitment	15-11-2049
41.	Salar Muhammad	MA (Political Science)	12-01-1990	Malakand	13-03-2017	13-03-2017	By initial recruitment	11-01-2050
42.	Muhammad Wahid Khan	MSc (Hons) Agriculture	22-06-1990	Dir Lower	13-03-2017	13-03-2017	By initial recruitment	21-06-2050
43.	Muhammad Shehzad	BSc (Hons)	05-05-1991	Peshawar	13-03-2017	13-03-2017	By initial recruitment	04-05-2051
44.	Sana Yousaf	B.S (Hons) Statics	06-03-1992	Abbottabad	13-03-2017	13-03-2017	By initial recruitment	05-03-2052
45.	Muhammad Salman	BS (Hons) Commerce	01-08-1992	D.I.Khan	13-03-2017	13-03-2017	By initial recruitment	31-07-2052
46.	Arifa Sidiqi	M.A (Archaeology)	13-05-1993	Chitral	13-03-2017	13-03-2017	By initial recruitment	12-05-2053
47.	Ifkhar Ahmed	Metric.	06-05-1993	Malakand	26-05-2017	26-05-2017	By initial recruitment	05-05-2053
48.	Sardar Ali Niazi	BA	14-01-1990	Chitral	09-08-2017	09-08-2017	By initial recruitment	13-01-2050
49.	Muhammad Sajid	BA	18-02-1988	D.I.Khan	09-08-2017	09-08-2017	By initial recruitment	17-02-2048

Verified
 Muhammad Zubair Khan Jadoon
 Advocate
 High Court Abbottabad

Endorsement No & date even

Copy for information to:-

- 1) The Section Officer General, Government of Khyber Pakhtunkhwa, Food Department Peshawar.
- 2) All Assistant Directors Food at Divisional level in Food Department Khyber Pakhtunkhwa
- 3) All District Food Controllers in Khyber Pakhtunkhwa
- 4) The Storage & Enforcement Officers NRC Azakhef & PRC Peshawar.
- 5) The Rationing Controller Peshawar.
- 6) Officials concerned.

Verified
 Muhammad Zubair Khan Jadoon
 Advocate
 High Court Abbottabad

Sd/-
 DIRECTOR FOOD
 KHYBER PAKHTUNKHWA
 PESHAWAR.

ASSISTANT DIRECTOR FOOD (F)



GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF FOOD
PESHAWAR.

No 859 /ET-Appointment of FGS
Dated Peshawar, the 13 March 2017

ANNEXURE-C

OFFICE ORDER

On the recommendations of the Departmental Selection Committee adduced in its meeting held from 08-03-2017 to 09-03-2017, Muhammad Shoaib Lodhi, S/O Muhammad Siddique Lodhi Village Lodhiabad Post Office Qalandarabad District Abbottabad is hereby appointed as Foodgrain Supervisor (BPS-07) against initial recruitment quota and posted in the office of District Food Controller Mansehra with immediate effect:-

2. His appointment against the post of Foodgrain Supervisor (BS-07) shall be on the following terms and conditions:-

- His appointment as Foodgrain Supervisor (BS-07) in Food Department Khyber Pakhtunkhwa would be purely on temporary basis.
- Benevolent Fund and G.P. Fund will be deducted from him as required under the relevant rules.
- He will join duty at his own expenses.
- He will furnish attested copies of his original documents.
- His Services will be subject to medical fitness for Government Service for which he shall produce Health and Age Certificates from the concerned Medical Superintendent.
- He will be governed by the rules and regulation issued by the Government from time to time for such category of Government Servants to which he belongs.
- In case of resignation at any time one month's notice will be necessary other wise one month's salary will be forfeited from him, in lieu thereof.
- He shall be on probation for a period of one year, which can be extended subject to his performance as per rules

3. He shall submit his arrival report for duties to the Office of District Food Controller, Mansehra by 27th March, 2017. If he fails to report for duties, within the stipulated period his appointment order shall stand cancelled.

Bmat
DIRECTOR FOOD
KHYBER PAKHTUNKHWA
PESHAWAR 13/03/17

Endorsement No & Even Date

Copy forwarded to :-

- PS to Minister Food Government of Khyber Pakhtunkhwa Peshawar.
- PS to Secretary Food Government of Khyber Pakhtunkhwa Peshawar.
- The District Accounts Officer Mansehra.
- The Assistant Director Food Hazara Division at Abbottabad.
- The District Food Controller Mansehra.
- Muhammad Shoaib Lodhi S/O Muhammad Siddique Lodhi Village Lodhiabad Post Office Qalandarabad District Abbottabad.
- Personal File.

Bmat

verified
Muhammad Zubair Khan Jalouni
Advocate
High Court Abbottabad

(16)

ANEXURE - D

Verified
Muhammad Zubair Khan Jadoon
Advocate
High Court, Abbottabad

To:- The Director Food,
Khyber Pakhtunkhwa,
Peshawar.

Through PROPER CHANNEL.

Subject:- SENIORITY LIST OF FOODGRAIN SUPERVISOR.

Respected Sir,

Respectfully it is stated that I was appointed as Foodgrain Supervisor in Food Department vide your office order No.859/ET dated 13/3/2017 & presently I am performing my duty as Foodgrain Supervisor in District Food Controller Office Mansehra since then. Now the seniority list of Foodgrain Supervisor in Food Department issued vide your No. 5399/ET-716 dated 20-12-2017 has been received in DFC office Mansehra. I beg to submit the following request for your sympathetic consideration :-

1. As per past practice vacant post of FGS in Food department were used to be advertised for whole Province KPK including Chitral District and recruitment was also made as per Zone wise quota and seniority of all concerned was also fixed accordingly.
2. In October 2016 recruitment process of FGS in Food Department KPK for District Chitral & rest of the Province KPK was suddenly changed & a number of 29 vacant posts of FGS in Food Department KPK were advertised through an advertisement bearing No.INF(P)5910 in newspapers for candidates Pakistani citizen having domicile of District Chitral only which were for posting in chitral (Copy enclosed for ready reference). Similarly through another advertisement bearing No. No.INF(P)5909 a number of 14 posts of FGS were advertised and applications were invited from candidates Pakistani citizen having domicile of rest of Province of KPK other than Chitral having zone wise break up for recruitment as per past routine/ practice and after going through a lengthy process suitable candidates including me were appointed as Foodgrain Supervisor in Food Department KPK as per routine matter.


Continued on Page # 02

verified
Muhammad Zubair Khan Jadoon
Advocate
High Court Abbottabad

Page # 02

3. Now seniority list of Foodgrain Supervisor in Food Department issued vide your letter under reference has thoroughly been examined which reveals that seniority of those appointed for posting in jurisdiction of District Chitral only has been mixed up with seniority of other Foodgrain Supervisors in Khyber Pakhtunkhwa which is a great injustice with us. Actually seniority of Foodgrain Supervisor appointed for chitral and rest of province Khyber Pakhtunkhwa is required to be maintained separately having different criteria of their posting /appointment at all stages as all candidates from other zone of the province were deprived & not given chance to apply for appointment in chitral as per past practice & now seniority has been mixed up with them for unknown reasons which is unlawful, injustice and needs to be set aside. By adopting the new recruitment policy for FGS separate for Chitral and rest of Province of Khyber Pakhtunkhwa and later on mixed up joint seniority list FGS issued. In case seniority of FGS so appointed is not differentiated on the basis of those appointed in Chitral having domicile condition with other FGS of rest of the Province having zone wise criteria, in future on promotion to next stage i.e. on post of Foodgrain Inspector in the entire province KPK most candidates will be from District Chitral as there is a large number of posts of FGS in District Chitral as compared to rest of the Province means fresh candidates in chitral will be appointed and on promotion will be expanded in rest of the Province.

It is therefore humbly requested that seniority of Foodgrain Supervisors appointed for specific region i.e. Jurisdiction of District Chitral only may kindly be maintained/ kept separately from those appointed in rest of districts of Khyber Pakhtunkhwa gone through restrictions of zone wise criteria as both have different nature and has no similarity i.e. station of posting etc & in no case be mixed up at this stage please.


(MUHAMMAD SHOAI B LODHI)
Foodgrain Supervisor,
DFC Office Mansehra.

18

ANNEXURE - B

16

Abbottabad



GOVERNMENT OF KHYBER PAKHTUNKHWA,
DIRECTORATE OF FOOD
PESHAWAR

No. 411 /PF-1377

Dated 24 /January, 2018

verified
[Signature]

To

- 1. All Assistant Directors Food at Divisional level in Food Department Khyber Pakhtunkhwa
- 2. All District Food Controllers in Khyber Pakhtunkhwa
- 3. The Storage & Enforcement Officers, NRC Azakhel & PRC Peshawar.

Subject:-

APPEAL AGAINST THE SENIORITY LIST OF FOODGRAIN SUPERVISORS AS IT STOOD ON 14-12-2017.

Memo:-

Reference District Food Controllers, Abbottabad and Mansehra letters No. 2810/ dated 28-12-2017 and No. 50-50/ET dated 05-01-2018, on the subject noted above.

2. As per appeals of M/s Muhammad Shoaib Lodhi, Muazzam Ali and others Foodgrain Supervisors of Food Department, Khyber Pakhtunkhwa against the seniority position of FGS of District Chitral, detail reply are as under:-

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[Signature]
Muhammad Zubair Khan
Advocate
High Court Abbottabad

There are 30 PRCs and 25 Sale Points in District Chitral. In order to overcome the deficiency of executive staff at District Chitral, the Provincial Government has sanctioned 23 fresh posts of Foodgrain Supervisors (BS-07), so that each PRC area could get one Foodgrain Supervisor for proper supervision. Being unattractive area coupled with the boarding / lodging problems & language barrier etc, officers and officials from the down districts generally shirk to perform duties in the area. Even the locals of Lower Chitral do not feel comfortable, if posted at Distant Upper Chitral and vice versa. It is this need of the hour to introduce reformative steps including induction of the local officials, preferably those hailing from the particular valleys where food storages are located.

2) In this context the Provincial Food Committee in its meeting dated 21st July 2016, propounded the following recommendations:-

Proposal of the Food Department is tenable. A summary should be moved for approval of the Honourable Chief Minister Khyber Pakhtunkhwa to accord approval for induction of locals against the vacant posts of Foodgrain Supervisors (BS-07), through the competitive processes of NTS mechanism, from among the locals of Chitral District with due regard for the candidates belonging to the valleys where PRC are located.

[Signature]
mm to all concerned
[Signature]

As per recommendation of Provincial Food Committee meeting dated 21st July 2016 summary was moved to the Chief Minister Khyber Pakhtunkhwa for relaxing the Appointment, Promotion & Transfer Rules, 1989, with the ground that Zonal allocation is mandatory for such initial appointments, whereby the local candidates would get very nominal share. On the other hand, the induction of candidates from other District against the post meant for Chitral District, has been proved counter-productive in the past, in that they not only absent themselves on one pretext or the other, but also strives for their postings out of Chitral. For instance, three Foodgrain Supervisors (M/s Abdul Salam, Amjad Ali & Usman Javed) appointed in 2012 never performed their duties at Chitral and removed from service under the Government of Khyber Pakhtunkhwa.

18

Verified
[Signature]

Muhammad Zubair Khan Jadoon
High Court Islamabad

4) The competent authority considered the views of Food Department Khyber Pakhtunkhwa and the recruitment of local candidates against the vacancies of Foodgrain Supervisors (BS-07) for District Chitral in relaxation of rules as a special case through the competitive processes of NTS and prescribed merit criteria. After proper approval the candidates of District Chitral were appointed against the vacant posts of FGS for District Chitral after completion of all codal formalities.

5. As above there is no such like rules to maintain a separate seniority list of FGS for District Chitral. Therefore, combined tentative seniority list of FGS was circulated amongst all concerned. Informed all concerned accordingly.

[Signature]

DEPUTY DIRECTOR FOOD (A&C)
KHYBER PAKHTUNKHWA
PESHAWAR

Endorsement No and Even date

Copy for information to:-

1. Muhammad Shoaib Lodhi, Foodgrain Supervisor, office of DFC Mansehra with reference to his application dated 17-10-2017.
2. Mr. Muazzam Ali, FGS office of DFC Abbottabad now Haripur with reference to his application dated Nil.
3. All Foodgrain Supervisors in Food Department Khyber Pakhtunkhwa.

[Signature]

DEPUTY DIRECTOR FOOD (A&C)
KHYBER PAKHTUNKHWA
PESHAWAR

DBA number 321
 BC No. 10-2575
 Name of Advocate محمد سید محمد

S.No. 72107
 وکالت نامہ



HEAD CLERK
 District Bar Association
 Abbottabad

بعد ازاں مدعوین نے اپنی اپنی دعاوی لیسٹور
 عنوان: محمد سید محمد بنام گورنمنٹ ہسپتال
 منجانب: گورنمنٹ نوعیت مقدمہ مدعوین (مطل)
 باعث تحریر آئندہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی پہلے پیشی یا تصفیہ مقدمہ بمقام گورنمنٹ ہسپتال کے لیے
محمد سید محمد کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص روز بروز عدالت حاضر ہوتا رہوں گا اور بروقت پکارے
 جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ
 سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام بکھری کے
 علاوہ کسی جگہ یا بکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ بکھری کے علاوہ کسی اور جگہ
 ساعت ہونے پر یا بروز تعطیل یا بکھری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے
 کسی معاوضہ کے ادا کرنے یا بخاندانہ کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخستہ صاحب موصوف
 مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم
 درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرانے اور ہر قسم کار و پیہ وصول کرنے اور رسید دینے اور داخل کرنے
 اور ہر قسم کے بیان دینے اور اس پر ثانی دراضی نامہ و فیصلہ رخصت کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے بے بیرونجات
 از بکھری صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا کٹرفہ درخواست حکم امتناعی یا قرتی یا گرفتاری قبل از گرفتاری و اجراءے ڈگری بھی صاحب
 موصوف کو بشرط ادائیگی علیحدہ محتانہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکور یا اس کے
 کسی جزو کی کاروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں
 وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ التجا پڑے گا وہ صاحب موصوف
 کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ
 کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

مورخہ: 18/02/22
 دن 18 ماہ 02 سال

Accepted

Muhammad Ahsan Jadoon
 Advocate
 High Court Abbottabad

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Appeal No. 337

Muhammad Shoaib Lodhi, Foodgrain Supervisor,
Mansehra.

Appellant

Versus

1 The Secretary Food Government of Khyber
Pakhtunkhwa, Food Department Peshawar.

2 The Director Food, Khyber Pakhtunkhwa,
Food Department Peshawar

3 The Deputy Director Food (A&C),
Food Directorate Peshawar

4 The Assistant Director Food
Hazara Division at Abbottabad

5 The District Food Controller, Mansehra

Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

NO. 01 TO 05

Respectfully Sheweth

Preliminary objections.

1. That the appeal is not maintainable as it is not in proper form.
2. That the appellant is estopped to file the present Appeal.
3. That the appellant has got no cause of action against the respondents.
4. That the issue invoked in present appeal is purely administrative and needs to be dealt with as such.
5. That the appellant has not come to the Tribunal with clean hands. Material facts have been concealed from this Honourable Tribunal. Thus, the appellant is not entitled to the relief prayed for
6. That the appellant has got no locus standi to prefer the appeal against respondents.
7. That the appellant is neither aggrieved person nor does he has locus standi to file the instant Appeal.

ON FACTS:

1. As Chitral District has peculiar geo-social conditions, vast territorial jurisdiction, remote localities, scattered population, difficult communication links and the area is prone to natural calamities, therefore, the Provincial Government has made special arrangements of Food Security for the District since long. Only one Provincial Reserve Centre (PRC) exists in other District of Khyber Pakhtunkhwa, there are 32 such PRCs & about 100 Sale points (mini-godowns) in the District. Due to weak Administrative Control and Management issues, numerous cases of infestations / damages of wheat and embezzlement have been detected.

In order to overcome the deficiency of executive staff, the Provincial Government had sanctioned 23 posts of Foodgrain Supervisors (BS07) as special one time arrangement, so that each PRC may have one Foodgrain Supervisor for proper supervision. Being unattractive area coupled with the boarding / lodging problems & language barrier etc, officers and officials from the down districts generally not to perform duties in the area. Even the locals of Lower Chitral do not feel comfortable, if posted at distant Upper Chitral and vice versa. It was thus need of the hour to introduce reformative steps including induction of the local official, preferably those hailing from the particular valleys where food storages are located. Therefore, approval of the competent authority by relaxing the appointment rules, were productive in ensuring reformation, punctuality and proper supervision of Government property. Above all, the masses being poor having

inherent sense of deprivation in all walks of life shall have a sigh of relief. The Provincial Food Committee in its meeting dated 21st July 2016, propounded the following recommendations in this context:-

Proposal of the Food Department is tenable. A summary was moved for approval of the Honourable Chief Minister Khyber Pakhtunkhwa, to accord approval for induction of locals against the vacant posts of Foodgrain Supervisors (BS-07), through the competitive processes of NTS mechanism, from among the locals of Chitral District with due regard for the candidates belonging to the valleys where PRCs are located.

According to Khyber Pakhtunkhwa Government servants Appointment, Promotions & Transfers Rules, 1989, allocation of Zonal allocation is mandatory for such initial appointments: whereby the local candidates would get very nominal share. On the other hand, the induction of candidates from other Districts against the posts meant for Chitral District, has proved counter-productive in the past, in that they not only absent themselves on one pretext or the other, but also strives for their postings out of Chitral.

Therefore, Food Directorate Khyber Pakhtunkhwa, Peshawar was of the considered views that recruitment of local candidates against the vacancies of Foodgrain Superiors (BS-07) through the competitive processes of NTS and prescribed merit criteria, in relaxation of rules as a special case, will be in the fitness of things from every point of view—punctuality, effective administrative control, financial discipline and alleviation of sense of deprivation of the local populace. On moving the summary, the Establishment Department endorsed the proposal of Food Department that considering the logic and ground realities presented by the Food Department, in the summary, the Hon,able Chief Minister Khyber Pakhtunkhwa, may approve as one time dispensation under extra ordinary situation. Accordingly, the Honourable Chief Minister Khyber Pakhtunkhwa approved the summary. **(Annex-I)**

On approval the summary, against the vacant posts meant for Chitral, application were invited through advertisement from the suitable candidates holding the Pakistani Citizenship and having Domicile of District Chitral through competitive process of NTS. **(Annex-II)**. After screening Test of NTS, candidates were short listed. And after completion of all codal formalities, local Chitrali's were appointed on 16-02-2017 against the vacant posts of FGS for PRCs Chitral on the basis of their due merit positions. While the other vacant posts of Junior Clerks (BS-11) and Foodgrain Supervisors (BS-07) meant for the Province in share of Zonal allocations were also advertised. After screening Test of NTS for the posts of Junior Clerks and Foodgrain Supervisors, candidates were short listed for both positions including the appellant and were appointed on 13-03-2017 on the basis of their due merit positions.

Further added that there is no such like rules to maintain a separate seniority list of FGS for District Chitral. Therefore, combined tentative seniority list of FGS was circulated amongst all concerned. **(Annex-III)**.

2. Pertains to records.
3. As per reply given at Para-1 of the above.
4. As per reply given at Para-1 of the above
5. As per reply given at Para-1 of the above.
6. As per reply given at Para-1 of the above.


GROUND.


- a. Incorrect. As per reply given at Para-01 of the facts. However, there is no such like rules to maintain a separate seniority list of FGS for District Chitral. Therefore, combined tentative seniority list of FGS was circulated amongst all concerned
- b. Incorrect. As per reply given at Para-01 of the facts.

- c. Incorrect. As per reply given at Para-01 of the facts.
- d. Incorrect. As per reply given at Para-01 of the facts.
- e. Incorrect. As per reply given at Para-01 of the facts.
- f. Incorrect. As per reply given at Para-01 of the facts.
- g. No comments.
- h. The respondents may be allowed to raise additional grounds at the time of arguments.


The appeal having no legal footing may, therefore, be dismissed with cost please.

RESPONDANTS


Secretary Food,
Government of Khyber Pakhtunkhwa,
Food Department, Peshawar
Respondent No.1


Director Food,
Khyber Pakhtunkhwa,
Peshawar
Respondent No.2


Deputy Director Food (A&C),
Food Directorate Peshawar
Respondent No.3


Assistant Director Food
Hazara Division at Abbottabad
Respondent No.4


District Food Controller,
Manshara
Respondent No.5



FOOD DEPARTMENT
KHYBER PAKHTUNKHWA
PESHAWAR



FOD-1052

SUMMARY FOR THE CHIEF MINISTER KHYBER PAKHTUNKHWA

Subject: **APPOINTMENT OF FOOD-GRAINS SUPERVISORS (BS-7) FROM AMONG THE LOCALS OF CHITRAL IN RELAXATION OF RULES.**

Date: 02-08-2016

As Chitral District has got peculiar geo-social conditions, vast territorial jurisdiction, remote localities, scattered population, difficult communication links and the area is prone to natural calamities, therefore, the Provincial Government has made special arrangements of food security for this District since long. As against only one Provincial Reserve Center (PRC) per other Districts of Khyber Pakhtunkhwa, there are 32 such Ware-houses & about 100 sale points (mini-godowns) in that District. Due to slack administrative control and management issues, numerous cases of infestations / damages of wheat and embezzlement have been detected. Report of the Secretary Food Khyber Pakhtunkhwa is worth perusal (Annex-I).

2. In order to overcome the deficiency of executive staff, the provincial government has recently sanctioned 23 posts of Food-grains Supervisors (BPS-7) so that each PRC could get one Food-grains Supervisor for proper supervision. Being unattractive area coupled with the boarding / lodging problems & language barrier etc, officers and officials from the down-districts generally shirk to perform duties in the area. Even the locals of Lower Chitral do not feel comfortable, if posted at distant Upper Chitral and vice versa. It is thus need of the hour to introduce reformative steps including induction of the local officials, preferably those hailing from the particular valleys where food storages are located. These arrangements, if approved by the competent authority by relaxing the appointment rules, shall be productive in ensuring reformation, punctuality and proper supervision of government property. Above all, the masses being poor having inherent sense of deprivation in all walks of life shall heave a sigh of relief. The Provincial Food Committee in its meeting dated 21st July 2016, propounded the following recommendations in this context:-

Proposal of the Food Department is tenable. A summary should be moved for approval of the Honorable Chief Minister Khyber Pakhtunkhwa to accord approval for induction of locals against the vacant posts of Food-grain Supervisors (BPS-7), through the competitive processes of NTS mechanism, from among the locals of Chitral District with due regard for the candidates belonging to the valleys where PRCs are located.
(Annex-II)

2

3. According to Khyber Pakhtunkhwa Government Servants Appointments, Promotions & Transfers Rules 1989, allocation of Zonal allocation is mandatory for such initial appointments (Annex-III); whereby the local candidates would get very nominal share. On the other hand, the induction of candidates from other Districts against the posts meant for Chitral District, has been proved counter-productive in the past, in that they not only absent themselves on one pretext or the other, but also strives for their postings out of Chitral. For instance, three Food-grains Supervisors (M/s Abdussalm, Amjad Ali & Usman Javed) appointed in 2012 never performed their duties at this station and are now facing proceedings under the Government Servants Efficiency & Discipline Rules, 2011.

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4. Therefore, Food Department is of the considered views that recruitment of local candidates against the vacancies of Food-grains Supervisors (BPS-7) through the competitive processes of NTS and prescribed merit criteria, in relaxation of rules as a special case, will be in the fitness of things from every point of view – punctuality, effective administrative control, financial discipline and alleviation of sense of deprivation of the local populace. Hon'able Chief Minister Khyber Pakhtunkhwa might like to consider the requisite proposal in the best public interest.

5. Para-4 of the summary is for approval of the Chief Minister Khyber Pakhtunkhwa.

Khan

SECRETARY FOOD

01-08-16.

MINISTER FOR FOOD,
KHYBER PAKHTUNKHWA.

[Signature]

02-8-2016

Haidar Khan Lodhi
Minister For Food
Khyber Pakhtunkhwa

SECRETARY ESTABLISHMENT,
KHYBER PAKHTUNKHWA.

CHIEF SECRETARY,
KHYBER PAKHTUNKHWA.


CHIEF MINISTER,
KHYBER PAKHTUNKHWA.

N.P.P

6. The summary for Chief Minister regarding appointment of Food Grain Supervisor (BS-07) from amongst the locals of Chitral in relaxation of rules has been examined.

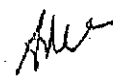
7. The post of Food Grain Supervisor is meant for initial recruitment on zonal allocation basis under which the District of Chitral will get its share but the share will not be enough to cater for the requirement of the department. Justification given by the department at para-2 of the summary is convincing and the argument that being unattractive area coupled with boarding and lodging problems and language barrier the officials from down district generally shirk to perform duties in the area, is logical.

8. Considering the logic and ground realities presented by the Department, Establishment Department endorses the proposal of Food Department contained in Para-4 of the Summary for approval of Chief Minister Khyber Pakhtunkhwa as one time dispensation under extra ordinary situation.

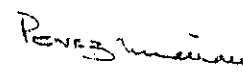

(Humaira Ahmed)
Secretary Establishment
September 06, 2016

Chief Secretary Khyber Pakhtunkhwa.

Chief Minister

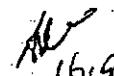

8/9/2016
Chief Secretary
Govt. of Khyber Pakhtunkhwa

9-
fs
Para 8 is approved


15.9.2016
Chief Minister
Khyber Pakhtunkhwa

10. Secretary Food
Ds. (Food)

A copy of this may be shared with the DF. for further processing.
A.
16-09-16.


16/9/16
Chief Secretary
Govt. of Khyber Pakhtunkhwa

http://www.dailymashriq.com

اللہ کے لیے سب سے بڑا قربان

DAILY MASHRIQ PESHAWAR

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پشاور

عہدہ کے بانی

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**FOOD DIRECTORATE,
KHYBER PAKHTUNKHWA PESHAWAR.**

APPLICATION REQUIRED

Applications are invited from suitable candidates holding Pakistani Citizenship and having domicile of District Chitral for the following vacant posts of Foodgrain Supervisor (BPS-07) in Food Department Khyber Pakhtunkhwa:-

S. No.	Name of Post & Scale	No. of Posts	No of posts in each Area of PRC of District Chitral	Qualification / Experience	Age Limit
1	Foodgrain Supervisor (BPS-07)	29	Female Quota 03 Disabile Quota 01 Minority Quota 01 Arrandu, Damel, Drosh, Ursoun, Madaklasht, Numburat, Shoghorc, Susoom, Arkari, Lutkoh, Gohore, Collen, Kuragh, Mastuj, Laspure, Yarkhoon, Broghil, Oveer, Cokhr, Koshi, Mulkoh, Koshum, Terich, Torkoh, Rech and Klot	Matri-culation or equivalent qualification from a recognized Board	18-30

Term & conditions

1. Application forms and other details are available at NTS Website, www.nts.org.pk, which must be read carefully before applying for the aforesaid posts.
2. NTS will charge Rs.450 / per application from the candidates as Test Processing Fee for the whole process. Fee can be submitted through prescribed Fee Slip in any online Branch of HBL, UBL, ABL and MCB of Khyber Pakhtunkhwa.
3. Form should be carefully filled in by the candidates because the provided information will be considered as final for further processing.
4. Not fulfilling any of the statements written in the application form will automatically exclude the candidate from the whole process.
5. Original Fee Slip and attested photocopies of all academic and experience certificates should be attached with the application form at the time of submission.
6. NTS Test will serve for short listing/screening purpose only. Post test process will be performed by the Food Department Khyber Pakhtunkhwa itself vis-a-vis the shortlisted candidates as per prescribed procedure.
7. Preference will be given to the candidate(s) hailing from the Union Councils where these Provincial Reserved Centres are located.
8. The competent authority reserves the right to change any condition, increase/decrease the number of vacancies or cancel the recruitment process by assigning valid reasons.
9. Only short listed candidates for a particular Provincial Reserve Centre or against a prescribed reserved quota shall be called for interview.
10. No.TA/DA shall be paid for test/interview.
11. The in service candidates of Government/ Semi Government Departments / Organizations are required to apply through proper channel.
12. The candidates shall have to apply for the post (s) within 15 days of the requisite publication.
13. The quota reserved for females / disabled/minority shall be on open merit within District Chitral.

For further information, candidates may please contact NTS at 051-8444441

**DIRECTOR FOOD
KHYBER PAKHTUNKHWA PESHAWAR.**

Ministry of Food, Government of Khyber Pakhtunkhwa, Peshawar
K.P. 8333
ISPP/5910



GOVERNMENT OF KHYBER PAKHTUNKHWA,
DIRECTORATE OF FOOD,
PESHAWAR

No. 5399/ET-716

Dated Peshawar, the 20/December, 2017

NOTIFICATION

In pursuance to Rule-17 of the Khyber Pakhtunkhwa Government Servants (Appointment, Promotion and Transfer) Rules 1989, the competent authority has been pleased to notify the Seniority List of Foodgrain Supervisors (BS-07) in Food Directorate Khyber Pakhtunkhwa, Peshawar as it stood on 14-12-2017.

S.No	Name of Govt. Servant	Qualification	Date of Birth	Domicile	Date of entry into Govt. Service	Date of appointment to the Present Post	Method of Recruitment / Appointment	Date of Superannuation
1.	Muhammad Ali Yousaf	B.Sc	22-08-1987	D.I.Khan	03-05-2012	03-05-2012	By initial recruitment	21-08-2047
2.	Zakir Bilal	Metric	24-02-1997	Bannu	18-04-2016	18-04-2016	By initial recruitment	23-02-2057
3.	Sher Ayub	MA	01-12-1987	Chitral	18-04-2016	18-04-2016	By initial recruitment	30-11-2047
4.	Miss Shaista Naz	Metric	10-01-1992	Peshawar.	18-04-2016	18-04-2016	By initial recruitment	09-01-2052
5.	Muhammad Atif	Metric	02-03-1998	Peshawar.	10-01-2017	10-01-2017	By initial recruitment	01-03-2049
6.	Shabir Ahmad	MSc (Economic)	09-11-1986	Chitral	16-02-2017	16-02-2017	By initial recruitment	08-11-2046
7.	Kheida	MSc (Statistic)	07-01-1987	Chitral	16-02-2017	16-02-2017	By initial recruitment	06-01-2046
8.	Muhyu Din	M.A (Islamiyat)	12-02-1987	Chitral	16-02-2017	16-02-2017	By initial recruitment	11-02-2047
9.	Farooq Ahmad	MBA	01-09-1987	Chitral	16-02-2017	16-02-2017	By initial recruitment	30-08-2047
10.	Aftab Hussain	MBA (Finance)	01-03-1988	Chitral	16-02-2017	16-02-2017	By initial recruitment	30-02-2048
11.	Muhammad Manzoor ul Haq	MA (English)	15-07-1988	Chitral	16-02-2017	16-02-2017	By initial recruitment	14-07-2048
12.	Israr ud Din Ahmad	M.A	10-11-1988	Chitral	16-02-2017	16-02-2017	By initial recruitment	09-11-2048
13.	Muhammad Riaz Ullah	MA (Political Science)	01-01-1990	Chitral	16-02-2017	16-02-2017	By initial recruitment	31-12-2050
14.	Syed Jehangir Shah	M.A (Economic)	12-02-1990	Chitral	16-02-2017	16-02-2017	By initial recruitment	11-02-2050
15.	Imtiaz Hussain Shah	MSc (Physiology)	14-02-1990	Chitral	16-02-2017	16-02-2017	By initial recruitment	13-02-2050
16.	Sanwar	MSc (Economic)	25-02-1990	Chitral	16-02-2017	16-02-2017	By initial recruitment	24-02-2050
17.	Aida Sultan	M.A (English)	30-03-1990	Chitral	16-02-2017	16-02-2017	By initial recruitment	29-03-2050
18.	Naveed Ahmad	M.A (Economic)	05-02-1991	Chitral	16-02-2017	16-02-2017	By initial recruitment	04-02-2051
19.	Muhammad Zubair	MLIS	01-10-1991	Chitral	16-02-2017	16-02-2017	By initial recruitment	30-09-2051
20.	Sajad Ali	B.S (Sociology)	08-10-1991	Chitral	16-02-2017	16-02-2017	By initial recruitment	07-10-2051
21.	Muhammad Riaz	M.Com	01-02-1992	Chitral	16-02-2017	16-02-2017	By initial recruitment	31-01-2052
22.	Islah ud Din	M.A(Physical Educ.)	15-10-1992	Chitral	16-02-2017	16-02-2017	By initial recruitment	14-10-2052
23.	Saira Bibi	M.A Physics	07-10-1992	Chitral	16-02-2017	16-02-2017	By initial recruitment	06-10-2052
24.	Muhammad Shahab	BSc	05-12-1988	Chitral	16-02-2017	16-02-2017	By initial recruitment	05-10-2052

25	Habib Ullah	B.Com	03-01-1990	Chitral	16-02-2017	16-02-2017	By initial recruitment	02-01-2050
25	Syed Karam Ali Shah	BSc	06-06-1992	Chitral	16-02-2017	16-02-2017	By initial recruitment	05-06-2052
26	Sunail Ahmad	B.A	30-05-1994	Chitral	16-02-2017	16-02-2017	By initial recruitment	29-05-2054
27	Shair Azeem	BSc	10-06-1994	Chitral	16-02-2017	16-02-2017	By initial recruitment	29-05-2052
28	Ihtsham Ul Haq	B.A	10-06-1994	Chitral	16-02-2017	16-02-2017	By initial recruitment	09-06-2054
29	Zaina	MA (Political Science)	05-03-1988	Chitral	16-02-2017	16-02-2017	By initial recruitment	04-03-2048
30	Nadir Wali Khan	M. Com	10-01-1990	Chitral	16-02-2017	16-02-2017	By initial recruitment	09-01-2050
31	Mansoor Wali Shah	MSc (Comp: Science)	15-06-1990	Chitral	16-02-2017	16-02-2017	By initial recruitment	14-06-2050
32	Mr. Naseeb Khan	MA (Political Science)	19-05-1986	Khyber Agency	13-03-2017	13-03-2017	By initial recruitment	18-05-2046
33	Qazi Junaid Bacha	M.Com (Managmt:Finance)	03-01-1987	Mardan	13-03-2017	13-03-2017	By initial recruitment	02-01-2047
34	Mujeeb ur Rehman	BSc (Hons)	05-01-1987	Bajour Agency	13-03-2017	13-03-2017	By initial recruitment	04-01-2047
35	Mauzzam Ali	MBA (Finance)	22-02-1989	Abbottabad	13-03-2017	13-03-2017	By initial recruitment	21-02-2049
36	Mr. Gohar Zaman	BS (Hons-Biotechnology)	12-04-1989	FR Bannu	13-03-2017	13-03-2017	By initial recruitment	11-04-2049
37	Mr. Azam Khan	BS (Hons-Biotechnology)	20-08-1989	Dir Lower	13-03-2017	13-03-2017	By initial recruitment	19-08-2049
38	Muhammad Shoaib Lodhi	MSc (Economic)	25-10-1989	Abbottabad	13-03-2017	13-03-2017	By initial recruitment	24-10-2049
39	Syed Zeeshan Mubarak	BS (Hons) Chemistry	16-11-1989	Mansehra	13-03-2017	13-03-2017	By initial recruitment	15-11-2049
40	Salar Muhammad	MA (Political Science)	12-01-1990	Malakand	13-03-2017	13-03-2017	By initial recruitment	11-01-2050
41	Muhammad Wahid Khan	MSc (Hons) Agriculture	22-06-1990	Dir Lower	13-03-2017	13-03-2017	By initial recruitment	21-06-2050
42	Muhammad Shehzad	BSc (Hons)	05-05-1991	Peshawar	13-03-2017	13-03-2017	By initial recruitment	04-05-2051
43	Sana Yousaf	B.S (Hons) Statics	06-03-1992	Abbottabad	13-03-2017	13-03-2017	By initial recruitment	05-03-2052
44	Muhammad Salman	BS (Hons) Commerce	01-08-1992	D.I.Khan	13-03-2017	13-03-2017	By initial recruitment	31-07-2052
45	Anifa Sidiqi	M.A (Archaeology)	13-05-1993	Chitral	13-03-2017	13-03-2017	By initial recruitment	12-05-2053
46	Iftikhar Ahmed	Metric	06-05-1993	Malakand	26-05-2017	26-05-2017	By initial recruitment	05-05-2053
47	Sardar Ali Niazi	BA	14-01-1990	Chitral	09-08-2017	09-08-2017	By initial recruitment	13-01-2050
48	Muhammad Sajid	BA	18-02-1988	D.I.Khan	09-08-2017	09-08-2017	By initial recruitment	17-02-2048

Sd/-
DIRECTOR FOOD
KHYBER PAKHTUNKHWA
PESHAWAR.

ASSISTANT DIRECTOR FOOD (E)
KHYBER PAKHTUNKHWA
PESHAWAR

Endorsement No & date even

Copy for information to:-

- 1) The Section Officer General, Government of Khyber Pakhtunkhwa, Food Department Peshawar.
- 2) All Assistant Directors Food at Divisional level in Food Department Khyber Pakhtunkhwa
- 3) All District Food Controllers in Khyber Pakhtunkhwa
- 4) The Storage & Enforcement Officers NRC Azakhel & PRC Peshawar.
- 5) The Rationing Controller Peshawar.
- 6) Officials concerned.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

SERVICE APPEAL NO.337/2018

Muhammad Shoaib Lodhi,
Food Grain Supervisor,.....Appellant.

Versus

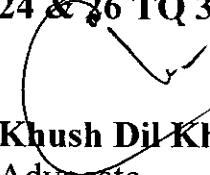
The Secretary,
Govt. of Khyber Pakhtunkhwa,
Food Department, Peshawar and others.....Respondents.

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S.No.	Description of Documents	Date	Annexure	Pages
1.	Copy of Reply by the respondent NO.6 TO 20, 23, 24 & 26 TO 34.			1-5
2.	Copy of Appointment Order of respondents No. 20 with related documents.	16-02-2017	A	6-8
3.	Copy of Appointment Order of respondents No. 26 with related documents.	16-02-2017	B	9-10

^{sd.}
Private Respondents
No. 6 TO 20, 23,
24 & 26 TO 34.

Through


Khush Dil Khan
Advocate,
Supreme Court of Pakistan
9-B, Haroon Mansion,
Khyber Bazar, Peshawar.
Cell # 091-2213445

Dated: 18/10/2019

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR
SERVICE APPEAL NO.337/2018

Muhammad Shoaib Lodhi,
Food Grain Supervisor,.....Appellant.

Versus

The Secretary,
Govt. of Khyber Pakhtunkhwa,
Food Department, Peshawar and others.....Respondents.

REPLY ON BEHALF OF PRIVATE RESPONDENTS
NO.6 TO 20, 23, 24 & 26 TO 34.

Respectfully Sheweth,

Preliminary Objections:

Preliminary objections raised by answering respondents are erroneous and frivolous, the detailed replies thereof are as under:-

- I. That the service appeal is not maintainable in its present form and shape and liable to be dismissed in limine.
- II. That appellant has no cause of action and locus standi, purposely filed this appeal just to harass the private respondents.
- III. That the appellant has not come in this Hon'ble Court with clean hands and material facts have been concealed from this Hon'ble Tribunal.

Facts:

1. That it is correct to this extent that two different advertisements have been published in the different news papers copies of which are already attached with the appeal and reply of the Government. The first advertisement dated 11-10-2016 for the appointment against the twenty five posts of Junior Clerk (BPS-11) and fourteen posts of Food Grain Supervisor (BPS-7) made on the basis of Province with allocation of the post to respective zones with women quota.

In the second advertisement which was published on 14-10-2016 for the appointment against twenty nine posts of Food Grain Supervisor (BPS-7) only for the candidates of District Chitral. It is pertinent to mention that in view of particular condition, environment and atmosphere of District Chitral the Food Department requested the Hon'ble Chief Minister through summary for creation / sanctioning new posts of the Food Grain Supervisor (BPS-7) for local candidates of District Chitral. The summary was duly processed and then approved by Chief Minister on 15-09-2016. The copy of summary is already attached with the reply of Government.

2. That the para 2 of the appeal is pertaining to record so no need of reply however, the answering respondents being local persons applied to the posts specifically advertised for the local candidates of District Chitral dated 14-10-2016. They also appeared in the screening test conducted through NTS which they qualified with merit and then interviewed by the departmental selection committee resultantly they


were selected and recommended for the requisite appointment on merit, in pursuance of which the appointment order was issued to the answering respondents on same and one date 16-02-2017 individually. They submitted their Joining Report in the Office of District Food Controller District Chitral after completing codal formalities including Medical Fitness Certificates. Copies of the Appointment Orders of respondents No. 20 and 26 with the Arrival Report and Medical Fitness Certificate are attached as **Annexure / Reply - A & B**.

3. That the para 3 of appeal is incorrect so denied. The process of selection in respect of local candidates of District Chitral was completed earlier after due process and then issued the appointment order of the selectees of the District Chitral against the specific posts advertised through separate advertisements and seniority assigned to them in according to order of merit of their selection. Since the selection of the answering respondents was completed earlier in pursuance of which appointment orders were issued accordingly.
4. That para 4 of the appeal is contrary to office record so denied. Since the selection process was completed earlier and assigned them in order to merit inter se so rightly assigned them senior position in the seniority list according to their earlier positions than the appellant.
5. That the para 5 of appeal is related to record so no need of reply.
6. That the para 5 of appeal is related to record so no need of reply.

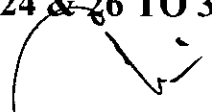
Reply to Grounds:


- A. That seniority in question was properly determined in view of the rules on subject and rightly assigned the senior position to answering respondents in view of their earlier selection on merit.
- B. That the ground B is related to record so no need of reply.
- C. That the ground C of the appeal is based on exaggeration and evasive in nature so denied.
- D. That the ground D of appeal is incorrect and against the law.
- E. That the ground E is incorrect so denied.
- F. That the ground F is incorrect so denied.
- G. That the ground G is incorrect as the appellant has no cause of action and he is stopple by his own conduct neither he challenged the summary regarding the creation of new posts nor the specific advertisement or challenged the selection process of the answering respondents so at this belated stage they cannot avail the benefit on the basis of seniority list because the seniority list based in order of merit of the answering respondents.
- H. That in this case the appellant only challenged the seniority list but he has not challenged the final order of the appellate authority so only on this score the appeal of appellant is not maintainable and liable to be dismissed.

It is, therefore, humbly prayed that on acceptance of this reply of answering respondents may graciously be rejected / dismissed the appeal of the appellant with the cost.


Private Respondents
No. 6 TO 20, 23,
24 & 26 TO 34.

Through


Khush Dil Khan
Advocate,
Supreme Court of Pakistan


Ashraf Ali Khattak,
Advocate,
High Court, Peshawar

Dated: 18/06/2019



GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF FOOD
PESHAWAR.

No 516 /ET-Appointment of FGS
Dated Peshawar, the 16th February, 2017

Annex A

P-6

OFFICE ORDER

On the recommendations of the Departmental Selection Committee adduced in its meeting held from 03-02-2017 to 06-02-2017, Mr. Sajad Ali S/O Sultan Shah Village Rui Post Office Garam Chashma Chitral is hereby appointed as Foodgrain Supervisor (BPS-07) against initial / respective recruitment quota at District Chitral, with immediate effect:-.

2. His appointment against the post of Foodgrain Supervisor (BS-07) shall be on the following terms and conditions:-

- His appointment as Foodgrain Supervisor (BS-07) in Food Department District Chitral would be purely on temporary basis.
- Benevolent Fund and G.P. Fund will be deducted from him as required under the relevant rules.
- He will join duty at his own expenses.
- He will furnish attested copies of his original documents.
- His Services will be subject to medical fitness for Government Service for which he shall produce Health and Age Certificates from the concerned Medical Superintendent.
- He will be governed by the rules and regulation issued by the Government from time to time for such category of Government Servants to which he belongs.
- In case of resignation at any time one month's notice will be necessary other wise one month's salary will be forfeited from him, in lieu thereof.
- He shall be on probation for a period of one year, which can be extended subject to his performance as per rules

3. He shall submit his arrival report for duties to the Office of District Food Controller, Chitral by 3rd March, 2017. If he fails to report for duties, within the stipulated period his appointment order shall stand cancelled.

DIRECTOR FOOD
KHYBER PAKHTUNKHWA
PESHAWAR

Endorsement No & Even Date

Copy forwarded to :-

- PS to Minister Food Government of Khyber Pakhtunkhwa Peshawar.
- PS to Secretary Food Government of Khyber Pakhtunkhwa Peshawar.
- The District Accounts Officer, Chitral.
- The Assistant Director Food Malakand Division with the directions to arrange necessary training in consultation with the District Food Controller, Chitral as well as Food Directorate, Peshawar.
- The District Food Controller, Chitral.
- Concerned Candidate / Personal File.

DIRECTOR FOOD
KHYBER PAKHTUNKHWA
PESHAWAR.

16/02

The District Food Controller,
Chitral.

Arrival Report

P-7

R/Sir,

Please refer to Food Directorate
Khyber Pakhtunkhwa Peshawar office
order vide No 516/ET- Appointment of
FGS Dated Peshawar the 16th
February, 2017. I beg to submit my
arrival report for duty as Foodgrain
Supervisor (BPs-07) in your office
today on 01-03-2017. (F.N).

HIC

Yours obediently,
Sajad Ali

Foodgrain Supervisor

Pl informed to DFC

and Place on Record. BPs (07)

1/3/17

MEDICAL CERTIFICATE.

P. 8

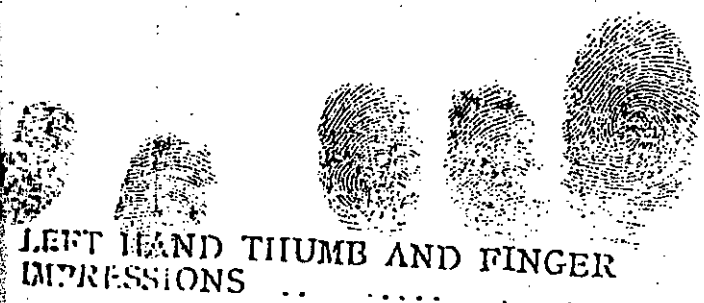
Name of Official..... Mr. Sajad Ali
 Caste or race..... Musangai
 Father's name..... Mr. Sultan Shah
 Residence. Village..... P. O. Post Office. Garam Chasma
 Tehsil & District..... Central
 Date of birth..... 08/10/1991
 Exact height by measurement..... 5' 6"
 Personal mark of identification..... Nil
 Signature of the Official..... *[Signature]*
 Signature of head of office.....

Seal of Office.....

[Signature]
 District Food Controller
 Central

I do hereby certify that I have examined Mr. Sajad Ali a candidate for employment in the office of the District Food Controller Central and can not discover that he had any disease communicable or other constitutional affection or bodily infirmity except..... Nil

I do not consider this as disqualification for employment in the office of the D.F.C. His age according to his own statement..... 26..... years and by appearance about Twenty Six years.



[Signature]
 MEDICAL SUPERINTENDENT
 D.F.C. HOSPITAL CENTRAL
 District Food Controller



GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF FOOD
PESHAWAR.

No 520 /ET-Appointment of FGS
Dated Peshawar, the 16th February, 2017

Annex: B

9-

OFFICE ORDER

On the recommendations of the Departmental Selection Committee adduced in its meeting held from 03-02-2017 to 06-02-2017, Muhammad Shahab S/O Farid Ahmad Khan R/O New Ghulam Palace Room No.19 behind Gharbi Police Station Saddar Peshawar is hereby appointed as Foodgrain Supervisor (BPS-07) against initial / respective recruitment quota at District Chitral, with immediate effect:-

2. His appointment against the post of Foodgrain Supervisor (BS-07) shall be on the following terms and conditions:-

- His appointment as Foodgrain Supervisor (BS-07) in Food Department District Chitral would be purely on temporary basis.
- Benevolent Fund and G.P. Fund will be deducted from him as required under the relevant rules.
- He will join duty at his own expenses.
- He will furnish attested copies of his original documents.
- His Services will be subject to medical fitness for Government Service for which he shall produce Health and Age Certificates from the concerned Medical Superintendent.
- He will be governed by the rules and regulation issued by the Government from time to time for such category of Government Servants to which he belongs.
- In case of resignation at any time one month's notice will be necessary other wise one month's salary will be forfeited from him, in lieu thereof.
- He shall be on probation for a period of one year, which can be extended subject to his performance as per rules

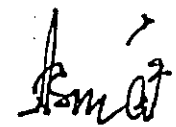
3. He shall submit his arrival report for duties to the Office of District Food Controller, Chitral by 3rd March, 2017. If he fails to report for duties, within the stipulated period his appointment order shall stand cancelled.

DIRECTOR FOOD
KHYBER PAKHTUNKHWA
PESHAWAR.

Endorsement No & Even Date

Copy forwarded to :-

- PS to Minister Food Government of Khyber Pakhtunkhwa Peshawar.
- PS to Secretary Food Government of Khyber Pakhtunkhwa Peshawar.
- The District Accounts Officer, Chitral.
- The Assistant Director Food Malakand Division with the directions to arrange necessary training in consultation with the District Food Controller, Chitral as well as Food Directorate, Peshawar.
- The District Food Controller, Chitral.
- Concerned Candidate / Personal File.


DIRECTOR FOOD
KHYBER PAKHTUNKHWA 16/02
PESHAWAR.

The District Food Controller,
-Chitral.

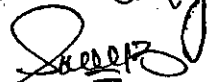
Arrival Report

P.10

R/Sir,

please refer to Food Directorate
Kyber Pakhtunkhwa Peshawar office
order vide NO 520/ET - Appointment
of FGS Dated Peshawar the
16th February 2017. I beg to
submit my arrival report
for duty as Food grain
Supervisor (BPS-07) in your office
today on 01-03-2017. (F.N)

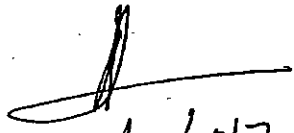
Yours obediently



Muhammad Shahab
Food grain Supervisor
BPS (07)

HIC

Pl Informed to DF
and placed on record.


1/3/17

WAKALAT NAMA

SA. no. 337/218

IN THE COURT OF In the High Court of Sindh
Muhammad Shah Lodi

Food grain supervisor of Mansher Appellant(s)/Petitioner(s)

VERSUS

The Secretary, Govt of S.P.
& other Food department Respondent(s)

I/We Shahid Ahmad & others do hereby appoint **Mr. Khush Dil Khan, Advocate Supreme Court of Pakistan** in the above mentioned case, to do all or any of the following acts, deeds and things.

1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard and any other proceedings arising out of or connected therewith.
2. To sign, verify and file or withdraw all proceedings, petitions, appeals, affidavits and applications 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 them for the conduct, prosecution or defence of the said case at all its stages.
3. To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of proceedings.

AND hereby agree:-

- a. That the Advocate(s) shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fee remains unpaid.

In witness whereof I/We have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this _____

Attested & Accepted by

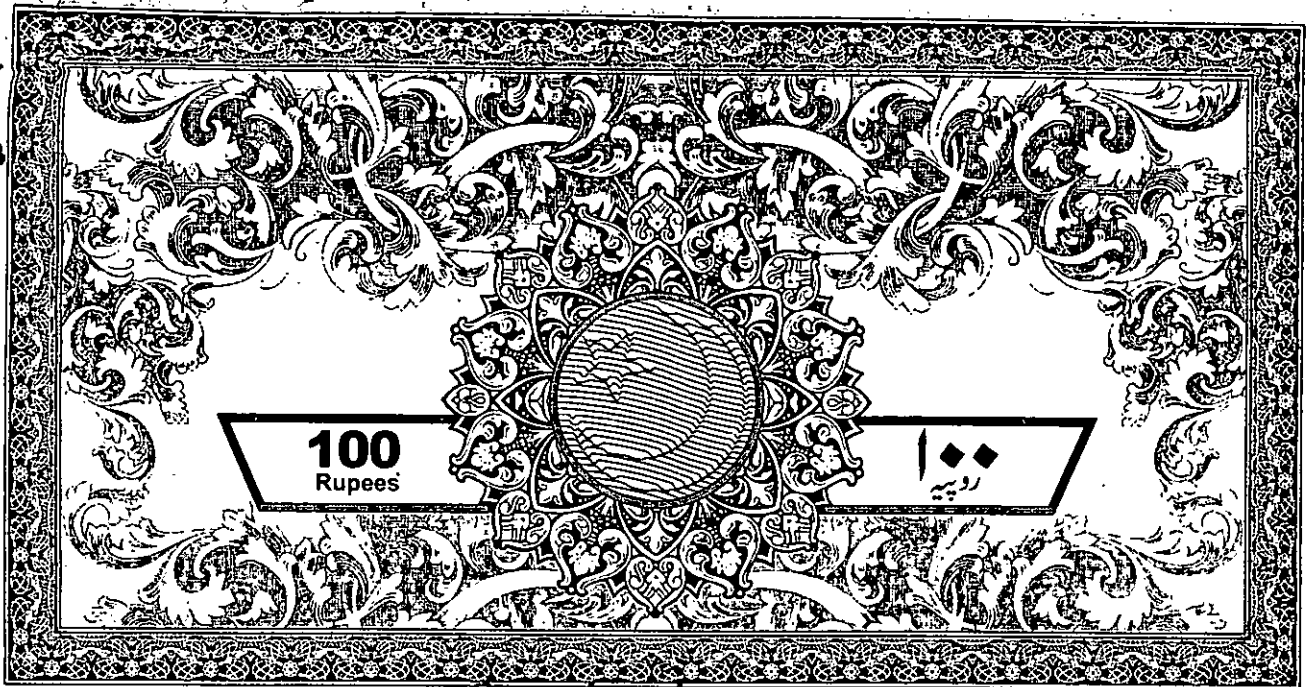
Khush Dil Khan,
Advocate,
Supreme Court of Pakistan
9-B, Haroon Mansion
Off. Tel: 091-2213445

(1) Signature of Executants

Signature of Executants

(2) Signature of Executants

Also Special
Attorney for
Respondent for
at (Pawala)



کعب اللہ جناب خلیفہ کچھو کچھو اسروس ٹریبیونل لکھنؤ اور
 مقدم عنوان مصلح علی وغیرہ بنام سکریٹری فوڈ KPK وغیرہ

فتم مسلمان ری شہیر احمد فوڈ ٹرمن سپروائزر ڈسٹرکٹ ضلع ال ری جس الدین ری فاروق احمد
 ری محمد منظور الحق ری اسرار الدین احمد ری محمد ریاض اللہ ری سید جہانگیر شاہ ری احتشام
 حسین شاہ ری سرور ری اغیڈہ سلطان ری نوید احمد ری محمد زبیر ری سجاد علی
 ری محمد ریاض ری صلاح الدین ری محمد شہاب ری حبیب اللہ ری سید کریم علی شاہ ری سید علی احمد
 ری شہیر عظیم ری احتشام الحق ری زینا ری ندیر وی خان ری منصور ولی شاہ ساکنان
 ضلع ضلع ال کٹریر نیہ الی روسے بیان کرتے ہیں کہ پچاس غلاف ایک مقدم بعنوان بالا علم اللہ
 بالا میں زیر سماعت ہے ہم چونکہ دور دراز علاقے سے تعلق رکھتے ہیں اور ہمیں ضروریات کی وجہ
 سے اصالتاً عدالت حضور عامر بیوک مقدم بالا کی پیروی کرنے سے قاصر ہیں یہاں پر ہم نے ہم
 اپنی طرف سے مسی محمد شہاب الدین دلد فریہ احمد ساکنی لنگہ درویش و سجاد علی دلد سلطان
 شاہ ساکنی روٹی رقم صبیح جو خود بھی مقدم مذکورہ بالا میں غرق ہیں کو اپنا مختار حق قرار دیا ہے
 اختیارات دیریتے ہیں کہ وہ پچاس طرف سے مقدم بالا کی پیروی کریں و کھانا خریدنے کی درخواست
 جواب درخواست اور اپنی وصولی واپس کریں نیز جملہ اختیارات جو مقدم بالا کے سلسلے میں
 ہمیں حاصل مختاران جو صوف کو کھولنے کی روٹی لینا ہے مختار نام کٹریر لکھنؤ تاکہ سندھ

اختیار کٹریر

اختیار دین خان

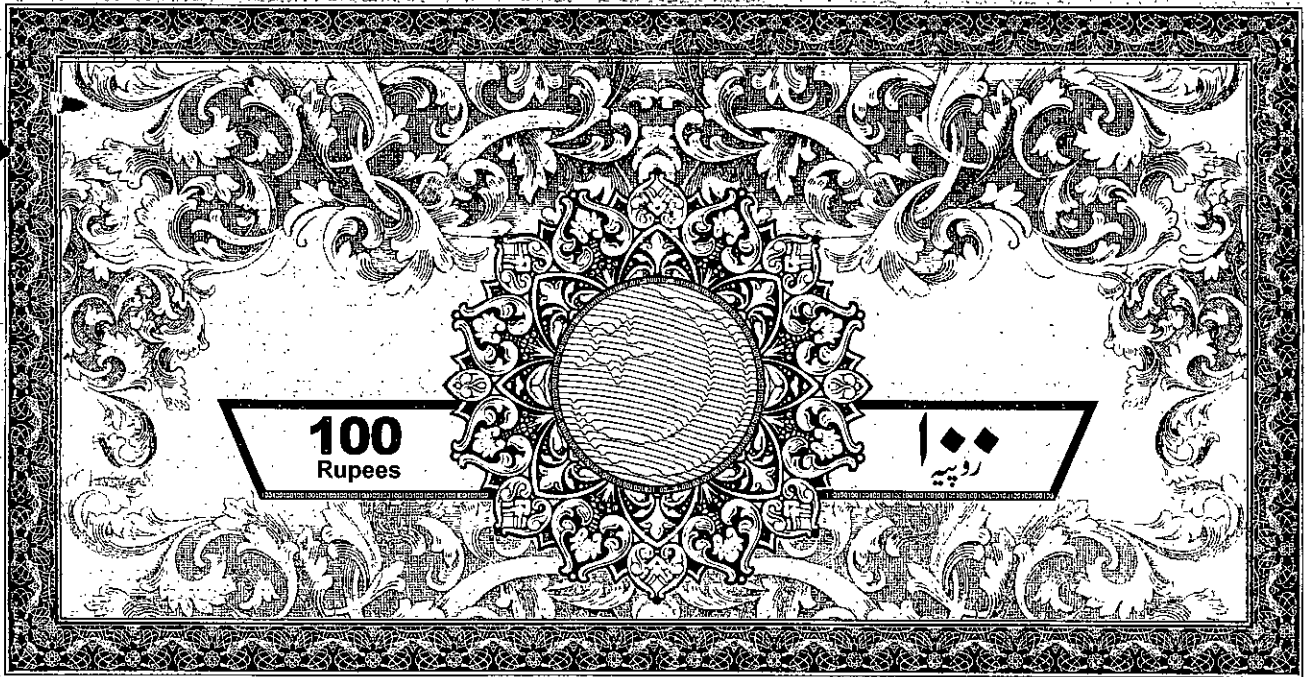
ری محمد شہاب الدین السید

ری شہیر احمد السید

ری سجاد علی السید

ری جس الدین

السید (P+0)



(16) ^{محمد شہباز} ^{محمد شہباز}
 (17) ^{محمد شہباز}
 (18) ^{محمد شہباز}
 (19) ^{محمد شہباز}
 (20) ^{محمد شہباز}
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 (23) ^{محمد شہباز}
 (24) ^{محمد شہباز}

(3) ^{محمد شہباز}
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 (13) ^{محمد شہباز}
 (14) ^{محمد شہباز}
 (15) ^{محمد شہباز}

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

M. Shoaib Lodhi.

VERSUS

Govt. of KPK etc

SERVICE APPEAL

no 337 / 2018

REJOINDER ON BEHALF OF PETITIONER

Respectfully Sheweth;-

PRELIMINARY OBJECTIONS:

1. That Para No. 1 comments is incorrect hence denied. The appeal is in proper forum.
2. That Para No. is incorrect, hence denied.
3. That Para No. 3 is incorrect. The appellant has cause of action.
4. That Para No. 4 is incorrect, hence denied.
5. That Para No. 5 is incorrect. Hence denied.

6. That para No. 6 is incorrect. The appellant has locus standi.
7. That Para No. 7 is incorrect. The appellant has been aggrieved and the grievances of the appellant were not properly redressed by the respondents and left the appellant with no option but to file the instant appeal.

FACTUAL OBJECTIONS:-

1. Para No. 1 of the comments is not correct and improperly arranged the real situation is that the respondent department advertised 14 posts of Foodgrain Supervisors BPS-7 on the zonal basis for the entire Province Khyber Pakhtunkhwa on dated 11/10/2016 while another advertisement regarding appointment of Local Chitralis against 29 posts of Foodgrain Supervisor BPS-7 for PRCs i.e Arrandu, Domel, Drosh, Ursoon, Madaklasht, Bubmorate, Shoghore, Susoom, Arkari, Lotkoh, Gobore Gollen, Kuragh, Mastuj Laspure Yarkhun, Borghal, Oveer, Gohkri, Kohst, Malkoh, Kushum,

reconciliation of the joint seniority list on the basis of order of merit, which was rejected by vide rejection order dated 24/01/2018 without any basic ground. Hence, denied.

2. Para No. 2 needs no reply.
3. Para No. 3 is incorrect, not properly replied.
4. Para No. 4 is incorrect, not properly replied.
5. Para No. 5 is incorrect, not properly replied.
6. Para No. 6 is incorrect, not properly replied.

GROUND S;-

- a) Para "a" of grounds is incorrect while the para "a" of the grounds of appeal is correct.
- b) That Para "b" of the comments is incorrect hence denied while para "b" of the appeal is correct.

- c) That Para "c" of the comments is incorrect hence denied while para "c" of the appeal is correct.
- d) That Para "d" of the comments is incorrect hence denied while para "d" of the appeal is correct.
- e) That Para "e" of the comments is incorrect hence denied while para "e" of the appeal is correct.
- f) That Para "f" of the comments is incorrect hence denied while para "f" of the appeal is correct.
- g) That Para "g" of the comments is incorrect hence denied while para "g" of the appeal is correct.
- h) That Para "h" of the comments is incorrect hence denied while para "h" of the appeal is correct.

In view the above, it is prayed that on acceptance of the rejoinder the appeal be allowed as prayed for.



...APPELLANT

Through

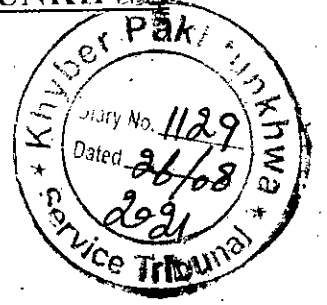
Dated: 16/10/2019

(Muhammad Zubair Khan Jadoon)
Advocate High Court, Abbottabad



Muhammad Zubair Khan Jadoon
Advocate
High Court Abbottabad

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR.



Service Appeal No.337/ 2018

Muhammad Shoaib Lodhi Food Grain Supervisor, Abbottabad.
..... Appellant

VERSUS

1. Government of KPK & others. Respondents.

APPLICATION FOR EARLY HEARING OF THE
ABOVE TITLE CASE AND GRANT OF STATUS QUO
AGAINST THE RESPONDENT

Respectfully Sheweth:-

1. That the above mentioned appeal is pending before the learned before the Hon' able Service Tribunal and fixed for 13/09/2021.
2. That the Respondent issued vide letter No. 3484/ET-269 (PER) dated 11/08/2021 in which they demand performance evaluation reports (PERS) for promotion purpose which effect our case. (Copy of letter has attached).

It is therefore most humbly prayed that on acceptance of this application the above title Service Appeal may kindly be fixed for an early date and grant of status quo as convenient to this Hon' able Tribunal.

Dated 26/08/2021


Appellant

Muhammad Shoaib Lodhi
Food Grain Supervisor, Mansehra

*Recd up to the court
along with original
filed
Shoaib Lodhi
26/8/2021*

Recd



GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF FOOD,
PESHAWAR

No: 3484/ET-269-PER

Dated: 11/08/2021


091-9225378 [M fooddirectoralekpk@gmail.com](mailto:fooddirectoralekpk@gmail.com) [@fooddirectoralekpk](https://www.facebook.com/fooddirectoralekpk) [@fooddirectoralekpk](https://twitter.com/fooddirectoralekpk)

To

1. All Assistant Directors Food at Divisional level in Food Department Khyber Pakhtunkhwa.
2. All District Food Controllers in Khyber Pakhtunkhwa.
3. The Storage & Enforcement Officers NRC Azakhel & PRC Peshawar.
4. The Rationing Controller Peshawar.

Subject: PERFORMANCE EVALUATION REPORTS (PERS)
Memo


In continuation of this Directorate letter No. 333/ET-269 dated 13-01-2021; and in order to finalize the promotion cases of officers and officials to the next higher scale, the Personal Performance Evaluation Reports for the period as mentioned in the attached list of your own and your staff may be furnished with 07 days positively.


DEPTY DIRECTOR FOOD (A&C),
KHYBER PAKHTUNKHWA,
PESHAWAR

Endorsement No & Date Ever:

Copy is forwarded to

1. The Section Officer General, Government of Khyber Pakhtunkhwa Food Department Peshawar.
2. PS to Secretary Food, Khyber Pakhtunkhwa.
3. PA to Director Food Khyber Pakhtunkhwa.
4. Concerned


DEPTY DIRECTOR FOOD (A&C),
KHYBER PAKHTUNKHWA,
PESHAWAR

S.No	Name of official	Designation	Deficiency of PERs for the period of
Assistant			
1.	Arshad Ali Khan	Assistant	2019,2020
2.	Abdul Wali Khan	Assistant	2017 to 2020
3.	Bashir Muhammad	Assistant	2019,2020
4.	Shehreyar Khan	Assistant	2019,2020
5.	Asif Khan	Assistant	2019, 2020
6.	Naseer Ahmed	Assistant	2019,2020
7.	Hazrat Ullah	Assistant	2018,2019,2020
8.	Zaheer-Abbas	Assistant	2014 to 2020
9.	Muhammad Ayaz	Assistant	2018 to 2020
10.	Zahid Ali	Assistant	2014 to 2020
11.	Syed Faridoon	Assistant	2019, 2020
12.	Muhammad Ibrahim	Assistant	2018 to 2020
13.	Arshad Farooq	Assistant	2017 to 2020
14.	Gohar Ali	Assistant	2018 to 2020
15.	Arshad Ali Khan	Assistant	2019,2020
Senior Clerk			
1.	Raheem Gul	Senior Clerk	2019, 2020
2.	Abdul Wali Khan	Senior Clerk	2016 to 2020
3.	Muhammad Ayaz	Senior Clerk	2019, 2020
4.	Ismail	Senior Clerk	2018 to 2020
5.	Atif Shah	Senior Clerk	2019, 2020
6.	Aminullah	Senior Clerk	2018 to 2020
7.	Shahid Khan	Senior Clerk	2019, 2020
8.	Gul Nawaz	Senior Clerk	, 2020
9.	Muhammad Jamil	Senior Clerk	2020
10.	Samad Nasir	Senior Clerk	2020
11.	Jaffar Khan	Senior Clerk	2016 to 2020
12.	Raheem Gul	Senior Clerk	2020
13.	Muhammad Ishaq Nawaz	Senior Clerk	2016
14.	Tila Muhammad	Senior Clerk	2019
15.	Mazzullah Khan	Senior Clerk	2020
16.	Jaffar Khan	Senior Clerk	2016 to 2020
Assistant Food Controller			
1.	Iqbal Hussain Afridi	Assistant Food Controller	2011,2016 to 2019
2.	Muhammad Azam Khan	Assistant Food Controller	2015,2016,2019 2020
3.	Tausif Iqbal	Assistant Food Controller	2018, 2019
Junior Clerk			
1.	Zubair Ali Khan	Junior Clerk	2020
2.	Fazal Hadi	Junior Clerk	2020
3.	Imran Khan	Junior Clerk	2020
4.	Haseeb Anwar	Junior Clerk	2020
5.	Fawad Ali Shah	Junior Clerk	2020
6.	Asad-Ur-Rehman	Junior Clerk	2020
7.	Umar Farooq	Junior Clerk	2020
8.	Ibrar Ali Shah	Junior Clerk	2020
9.	Gohar Iqbal	Junior Clerk	2020
10.	Kousar Shaheen	Junior Clerk	2020
11.	Asma Adween	Junior Clerk	2020

12	Nadeem Khan	Junior Clerk	2020
13	Mst. Samina Sajjad	Junior Clerk	2016, 2019, 2020
14	Mr. Abdur Rehman	Junior Clerk	2019, 2020
15	Mr. Mohibullah	Junior Clerk	2019, 2020
17	Muhammad Gayab	Junior Clerk	2013, 2017, 2019, 2020
18	Sarwar Ali	Junior Clerk	2020
19	Rafiq Ahmad	Junior Clerk	2013, 2018, 2020
20	Gardar Razaan	Junior Clerk	2016, 2019, 2020
21	Sajid Hussain	Junior Clerk	2019, 2020
22	Noor Shahdin	Junior Clerk	2016, 2019, 2020
24	Jehan Nawab	Junior Clerk	2018 to 2020
25	Nabeela Alam	Junior Clerk	2019, 2020
26	Muhammad Nasir	Junior Clerk	2019, 2020
27	Amara Urooj	Junior Clerk	2019, 2020
28	Khush Bakht	Junior Clerk	Complete
29	Asad Ullah	Junior Clerk	2019, 2020
30	Safia Naz	Junior Clerk	2018 to 2020
31	Qazi Mashood Sayaf	Junior Clerk	2019, 2020

Foodgrain Inspector

1.	Sami Ullah Jan	Foodgrain Inspector	2019, 2020
2.	Mukhtar Ahmad	Foodgrain Inspector	2011 to 2020
3.	Dinar Wali	Foodgrain Inspector	1997 to 2004, 2011 to 2020
4.	Azhar Pervaz	Foodgrain Inspector	2019, 2020
5.	Muhammad Raiz Ahmad	Foodgrain Inspector	2019, 2020
6.	Said Halim	Foodgrain Inspector	2019, 2020
7.	Bashir Gul	Foodgrain Inspector	2019, 2020
8.	Paristan	Foodgrain Inspector	2019, 2020
9.	Niaz Ali	Foodgrain Inspector	2020
10.	Rohul Amin	Cane Inspector	2019
11.	Sahibzada Ziad Mohammad	Cane Inspector	1997 to 2006, 2012, 2015, 2016, 2019, 2020
12.	Muhammad Sharif	Cane Inspector	1997 to 2007, 2018 to 2020
13.	Muhammad Nadeem	Foodgrain Inspector	2016
14.	Manzoor Alam	Foodgrain Inspector	2018 to 2020

Foodgrain Supervisor

1.	Said Abdul Salam	Foodgrain Supervisor	2016 to 2020
2.	Usman Javed	Foodgrain Supervisor	2013, 2015 to 2020
3.	Zakir Bilal	Foodgrain Supervisor	2019, 2020
4.	Sher Ayub	Foodgrain Supervisor	2018 to 2020
5.	Ms Shaista Naz	Foodgrain Supervisor	2017 to 2020
6.	Muhammad Atif	Foodgrain Supervisor	2018 to 2020
7.	Shabir Ahmad	Foodgrain Supervisor	2018 to 2020
8.	Muhyin Din	Foodgrain Supervisor	2018 to 2020
9.	Farooq Ahmad	Foodgrain Supervisor	2018 to 2020
10.	Muhammad Manzoor Ul Haq	Foodgrain Supervisor	2018 to 2020
11.	Israr ud Din Ahmad	Foodgrain Supervisor	2018 to 2020
12.	Muhammad Riaz Ullah	Foodgrain Supervisor	2018 to 2020
13.	Syed Jehangir Shah	Foodgrain Supervisor	2018 to 2020
14.	Imtiaz Hussain Shah	Foodgrain Supervisor	2018 to 2020
15.	Sarwar	Foodgrain Supervisor	2018 to 2020
16.	Afida Sultan	Foodgrain Supervisor	2018 to 2020

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR.

Service Appeal No.337/ 2018

Muhammad Shoaib Lodhi Food Grain Supervisor, Abbottabad.
..... Appellant

VERSUS

1) Government of KPK & others. Respondents.

APPLICATION FOR EARLY HEARING OF THE
ABOVE TITLE CASE AND GRANT OF STATUS QUO
AGAINST THE RESPONDENT

Respectfully Sheweth:-

1. That the above mentioned appeal is pending before the learned before the Hon' able Service Tribunal and fixed for 13/09/2021.
2. That the Respondent issued vide letter No. 3484/ET-269 (PER) dated 11/08/2021 in which they demand performance evaluation reports (PERS) for promotion purpose which effect our case. (Copy of letter has attached).

It is therefore most humbly prayed that on acceptance of this application the above title Service Appeal may kindly be fixed for an early date and grant of status quo as convenient to this Hon' able Tribunal.

Dated 26/08/2021


Appellant

Muhammad Shoaib Lodhi
Food Grain Supervisor, Mansehra



GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF FOOD,
PESHAWAR

No: 3484/ET-269-PER

Dated: 11/08/2021


091-9225378 M fooddirectoratkpk@gmail.com @fooddirectoratkpk @fooddirectoratkpk

To

1. All Assistant Directors Food at Divisional level in Food Department Khyber Pakhtunkhwa.
2. All District Food Controllers in Khyber Pakhtunkhwa.
3. The Storage & Enforcement Officers NRC Azakhel & PRC Peshawar.
4. The Rationing Controller Peshawar.

Subject: PERFORMANCE EVALUATION REPORTS (PERS)
Memo

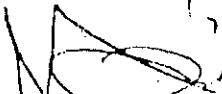
In continuation of this Directorate letter No. 333/ET-269 dated 13-01-2021, and in order to finalize the promotion cases of officers and officials to the next higher scale, the Personal Performance Evaluation Reports for the period as mentioned in the attached list of your own and your staff may be furnished with 07 days positively.


DEPTY DIRECTOR FOOD (A&C),
KHYBER PAKHTUNKHWA,
PESHAWAR

Endorsement No & Date Even

Copy is forwarded to

1. The Section Officer General, Government of Khyber Pakhtunkhwa Food Department Peshawar.
2. PS to Secretary Food, Khyber Pakhtunkhwa.
3. PA to Director Food Khyber Pakhtunkhwa.
4. Concerned


DEPTY DIRECTOR FOOD (A&C),
KHYBER PAKHTUNKHWA,
PESHAWAR

S.No	Name of official	Designation	Deficiency of PERs for the period of
Assistant			
1.	Arshad-Ali Khan	Assistant	2019,2020
2.	Abdul Wali Khan	Assistant	2017 to 2020
3.	Bashir Muhammad	Assistant	2019,2020
4.	Shehreyar Khan	Assistant	2019,2020
5.	Asif Khan	Assistant	2019, 2020
6.	Naseer Ahmed	Assistant	2019,2020
7.	Hazrat Ullah	Assistant	2018,2019,2020
8.	Zaheer Abbas	Assistant	2014 to 2020
9.	Muhammad Ayaz	Assistant	2018 to 2020
10.	Zahid Ali	Assistant	2014 to 2020
11.	Syed Faridoon	Assistant	2019, 2020
12.	Muhammad Ibrahim	Assistant	2018 to 2020
13.	Arshad Farooq	Assistant	2017 to 2020
14.	Gohar Ali	Assistant	2018 to 2020
15.	Arshad Ali Khan	Assistant	2019,2020
Senior Clerk			
1.	Raheem Gul	Senior Clerk	2019, 2020
2.	Abdul Wali Khan	Senior Clerk	2016 to 2020
3.	Muhammad Ayaz	Senior Clerk	2019, 2020
4.	Ismail	Senior Clerk	2018 to 2020
5.	Atif Shah	Senior Clerk	2019, 2020
6.	Aminullah	Senior Clerk	2018 to 2020
7.	Shahid Khan	Senior Clerk	2019, 2020
8.	Gul Nawaz	Senior Clerk	2020
9.	Muhammad Jamil	Senior Clerk	2020
10.	Samad Nasir	Senior Clerk	2020
11.	Jaffar Khan	Senior Clerk	2016 to 2020
12.	Raheem Gul	Senior Clerk	2020
13.	Muhammad ishaq Nawaz	Senior Clerk	2016
14.	Tila Muhammad	Senior Clerk	2019
15.	Mazzullah Khan	Senior Clerk	2020
16.	Jaffar Khan	Senior Clerk	2016 to 2020
Assistant Food Controller			
1.	Iqbal Hussain Afridi	Assistant Food Controller	2011,2016 to 2019
2.	Muhammad Azam Khan	Assistant Food Controller	2015,2016,2019 2020
3.	Tausif Iqbal	Assistant Food Controller	2018, 2019
Junior Clerk			
1.	Zubair Ali Khan	Junior Clerk	2020
2.	Fazal Hadi	Junior Clerk	2020
3.	Imran Khan	Junior Clerk	2020
4.	Haseeb Anwar	Junior Clerk	2020
5.	Fawad Ali Shah	Junior Clerk	2020
6.	Asad-Ur-Rehman	Junior Clerk	2020
7.	Umar Farooq	Junior Clerk	2020
8.	Ibrar Ali Shah	Junior Clerk	2020
9.	Gohar iqbal	Junior Clerk	2020
10.	Kousar Shaheen	Junior Clerk	2020
11.	Asma Adween	Junior Clerk	2020

12	Nadeem Khan	Junior Clerk	2020
13	Mst. Samina Sajjad	Junior Clerk	2015, 2019, 2020
14	Mr. Abdur Rehman	Junior Clerk	2019, 2020
15	Mr. Mohibullah	Junior Clerk	2019, 2020
17	Muhammad Gayab	Junior Clerk	2013, 2017, 2019, 2020
18	Sarwar Ali	Junior Clerk	2020
19	Rafiq Ahmad	Junior Clerk	2013, 2018, 2020
20	Qadar Razaan	Junior Clerk	2016, 2019, 2020
21	Sajid Hussain	Junior Clerk	2019, 2020
22	Noor Shauhin	Junior Clerk	2016, 2019, 2020
24	Jehan Nawab	Junior Clerk	2018 to 2020
25	Nabeela Alam	Junior Clerk	2016, 2020
26	Muhammad Nasir	Junior Clerk	2019, 2020
27	Amara Urooj	Junior Clerk	2019, 2020
28	Khush Bakht	Junior Clerk	Complete
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5.	Muhammad Raiz Ahmad	Foodgrain Inspector	2019, 2020
6.	Said Halim	Foodgrain Inspector	2019, 2020
7.	Bashir Gul	Foodgrain Inspector	2019, 2020
8.	Paristan	Foodgrain Inspector	2019, 2020
9.	Niaz Ali	Foodgrain Inspector	2020
10.	Rohul Amin	Cane Inspector	2019
11.	Sahbzada Ziad Mohammad	Cane Inspector	1997 to 2006, 2012, 2015, 2016, 2019, 2020
12.	Muhammad Sharif	Cane Inspector	1997 to 2007, 2018 to 2020
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14.	Manzoor Alam	Foodgrain Inspector	2018 to 2020

Foodgrain Supervisor

1.	Said Abdul Salam	Foodgrain Supervisor	2016 to 2020
2.	Usman Javed	Foodgrain Supervisor	2013, 2015 to 2020
3.	Zakir Bilal	Foodgrain Supervisor	2019, 2020
4.	Sher Ayub	Foodgrain Supervisor	2018 to 2020
5.	Ms Shaista Naz	Foodgrain Supervisor	2017 to 2020
6.	Muhammad Atif	Foodgrain Supervisor	2018 to 2020
7.	Shabir Ahmad	Foodgrain Supervisor	2018 to 2020
8.	Muhyn Din	Foodgrain Supervisor	2018 to 2020
9.	Farooq Ahmad	Foodgrain Supervisor	2018 to 2020
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Service Appeal No.337/ 2018

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Dated 26/08/2021


Appellant

Muhammad-Shoaib Lodhi
Food Grain Supervisor, Mansehra



GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF FOOD,
PESHAWAR

No: 3484/ET-269-PER
Dated: 11/08/2021

091-9225378 fooddirectoralekpk@gmail.com @fooddirectoralekpk @fooddirectoralekpk

To

1. All Assistant Directors Food at Divisional level in Food Department Khyber Pakhtunkhwa.
2. All District Food Controllers in Khyber Pakhtunkhwa.
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Subject: PERFORMANCE EVALUATION REPORTS (PERS)
Memo


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DEPTY DIRECTOR FOOD (A&C),
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Endorsement No & Date Even

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DEPTY DIRECTOR FOOD (A&C),
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5.	Asif Khan	Assistant	2019, 2020
6.	Naseer Ahmed	Assistant	2019,2020
7.	Hazrat Ullah	Assistant	2018,2019,2020
8.	Zaheer Abbas	Assistant	2014 to 2020
9.	Muhammad Ayaz	Assistant	2018 to 2020
10.	Zahid Ali	Assistant	2014 to 2020
11.	Syed Faridoon	Assistant	2019, 2020
12.	Muhammad Ibrahim	Assistant	2018 to 2020
13.	Arshad Farooq	Assistant	2017 to 2020
14.	Gohar Ali	Assistant	2018 to 2020
15.	Arshad Ali Khan	Assistant	2019,2020
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2.	Abdul Wali Khan	Senior Clerk	2016 to 2020
3.	Muhammad Ayaz	Senior Clerk	2019, 2020
4.	Ismail	Senior Clerk	2018 to 2020
5.	Atif Shah	Senior Clerk	2019, 2020
6.	Aminullah	Senior Clerk	2018 to 2020
7.	Shahid Khan	Senior Clerk	2019, 2020
8.	Gul Nawaz	Senior Clerk	2020
9.	Muhammad Jamil	Senior Clerk	2020
10.	Samad Nasir	Senior Clerk	2020
11.	Jaffar Khan	Senior Clerk	2016 to 2020
12.	Raheem Gul	Senior Clerk	2020
13.	Muhammad Ishaq Nawaz	Senior Clerk	2016
14.	Tila Muhammad	Senior Clerk	2019
15.	Mazzullah Khan	Senior Clerk	2020
16.	Jaffar Khan	Senior Clerk	2016 to 2020
Assistant Food Controller			
1.	Iqbal Hussain Afridi	Assistant Food Controller	2011,2016 to 2019
2.	Muhammad Azam Khan	Assistant Food Controller	2015,2016,2019 2020
3.	Tausif Iqbal	Assistant Food Controller	2018, 2019
Junior Clerk			
1.	Zubair Ali Khan	Junior Clerk	2020
2.	Fazal Hadi	Junior Clerk	2020
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9.	Gohar Iqbal	Junior Clerk	2020
10.	Kousar Shaheen	Junior Clerk	2020
11.	Asma Adween	Junior Clerk	2020

12	Nadeem Khan	Junior Clerk	2020
13	Mrs. Samina Sajjad	Junior Clerk	2016, 2019, 2020
14	Mr. Abdur Rehman	Junior Clerk	2019, 2020
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17	Muhammad Gayab	Junior Clerk	2013, 2017, 2019, 2020
18	Sarwar Ali	Junior Clerk	2020
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20	Sardar Rizwan	Junior Clerk	2016, 2019, 2020
21	Sajid Hussain	Junior Clerk	2019, 2020
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Foodgrain Inspector

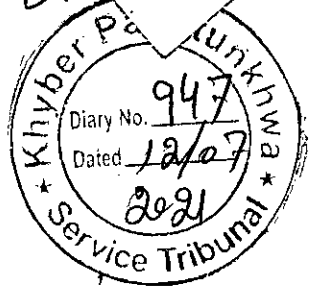
1.	Sami Ullah Jan	Foodgrain Inspector	2019, 2020
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14.	Imtiaz Hussain Shah	Foodgrain Supervisor	2018 to 2020
15.	Sarwar	Foodgrain Supervisor	2018 to 2020
16.	Afida Sultan	Foodgrain Supervisor	2018 to 2020

فوائد میں سے کسی ایک کو بھیجیں

باج - جو شعبہ اودھلی و نگر سرحدی



Put up to the court chain - in with relevant appeal.

قود کریں سرحدی خواتین ایس ایچ

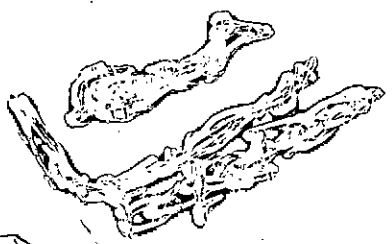
Deadu 337/2018

لو اسٹ ایمر اور منقل ایمل

فوائد عالی
سے لے کر جنرل اور خواتین سے
ان کے ساتھ ساتھ ان کے
سے اور خواتین کے ساتھ ساتھ
ان کے ساتھ ساتھ ان کے ساتھ ساتھ
سے سرحدی خواتین ایس ایچ
کیا آیا ہے۔ لہذا ایمل 337/2018
کو خواتین کے سرحدی خواتین
کیا گیا ہے۔ ان کے ساتھ ساتھ
سے ان کے ساتھ ساتھ ان کے ساتھ ساتھ

12/7/2021

M. Najam AAI



سے لے کر جنرل اور خواتین سے
ان کے ساتھ ساتھ ان کے ساتھ ساتھ
سے ان کے ساتھ ساتھ ان کے ساتھ ساتھ