

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Put up to the Court with
relevant appeal.

Khyber Pakhtunkhwa
Service Tribunal

Case No. 229/

Dated 13/12/22

In re:
SA No. 02/2021

13/12/2022

Sajjad AhmadAppellant

Reader

VERSUS

The Conservator of Forest & othersRespondents

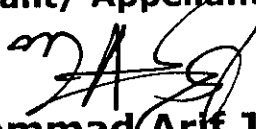
APPLICATION FOR SUSPENSION OF
PROMOTION/ APPOINTMENT OF
FORESTER BPS-10 TO THE POST OF
DEPUTY RANGER BPS-12, AGAINST
WHICH A MEETING IS DEPARTMENTAL
PROMOTION COMMITTEE IS HEREBY
SCHEDULED FOR 16.12.2022.

Respectfully Sheweth:-

1. That the above title case is pending adjudication before this honourable Court which is fixed for hearing on 26.12.2022.
2. That a DPC pertains to the promotion to the post of Dy; Ranger is scheduled for 16.12.2022, but it is worth mention here that, a restraining dated 15.10.2021 has been passed by this hon'ble Tribunal on the subject matter in the titled appeal, which is still in field, in appeal filed by respondent No.6. (Copy of order dated 15.10.2021 is attached)

3. That it is worth mention here that, due to malafide intention, Tahir Ayub/ respondent No.6 in the titled appeal being Forest Guard challenged the seniority list, but during pendency of appeal, the appellant accepted his promotion to the post of Forester.
4. That astonishingly, the respondent No.6 has wrongly been promoted to the post of Forester, but his name has been placed in the upcoming DPC for the post of Dy; Ranger Forest, which is against the law, rules and regulations governing the subject matter, hence requires consideration of this Hon'ble Tribunal.
5. That if the operation of the DPC scheduled for 16.12.2022 is not suspended, the applicant will suffer irreparable losses.
6. That the applicant is eligible, qualified and entitled on four corners to be considered for promotion to the post of Deputy Ranger Forest, but his name has not been included in the DPC.
7. That the authority concerned adopted the policy of pick & choose, just to accommodate their blue eyed.
8. That any other grounds not specifically taken will be argued at the time of hearing with permission of this hon'ble Tribunal.

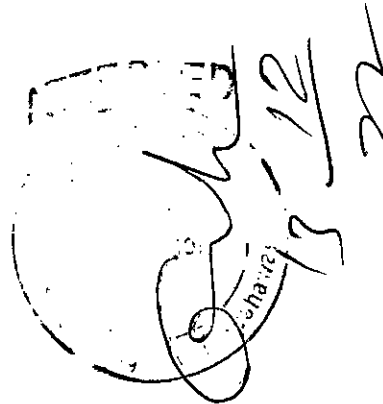
It is, therefore, humbly prayed that on acceptance of this application, the respondents be restrained to honor the order dated 15.10.2021 of this hon'ble Tribunal and not to finalize the promotion cases from Forester to Deputy Rangers in the DPC meeting held on 16.12.2022 till final decision of titled appeal.

Applicant/ Appellant
Through 
Muhammad Arif Jan
Advocate Peshawar

AFFIDAVIT

I, Sajjad Ahmad S/o Abdul Sattar, Siran Forest Dir, Manshera (Appellant), do hereby solemnly affirm and declare that the contents of accompanying Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


Deponent


13/12/22

CHIEF CONSERVATOR OF FORESTS
CENTRAL SOUTHERN FOREST REGION-I
PESHAWAR

(1142)

SHAKI ROAD PESHAWAR
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To

The Station Officer (Establishment),
Government of Khyber Pakhtunkhwa
Forestry, Environment & Wildlife Department
Peshawar

Subject: PROMOTION/APPOINTMENT OF FORESTER (BPS-10) TO THE POST OF DEPUTY RANGER (BPS 12) ON REGULAR/ACTING CHARGE BASIS

Memo

As per requests made by OFs Kohat Forest Circle and Central Forest Circle Peshawar and in wake of cancellation of Circles, the meeting of the Departmental Promotion Committee already scheduled on 02/12/2022 at 11:00 Hours under the Chairmanship of Chief Conservator of Forests Central Southern Forest Region-I, Khyber Pakhtunkhwa Peshawar is hereby postponed and rescheduled on 16/12/2022.

Chief Conservator of Forests
Central Southern Forest Region-I
Khyber Pakhtunkhwa Peshawar

No. 1854/E.

Copy is forwarded for information and necessary action to the -

1. Conservator Forests Kohat Forest Circle at Peshawar with reference to his letter No. 1854/E, dated 24/11/2022.
2. Conservator of Forests Mankand East Forest Circle Saidu Sharif Swat
3. Conservator of Forests Forestry Planning & Monitoring Circle Peshawar
4. Conservator of Forests Central Forest Circle Peshawar with reference to his letter No. 2534/E dated 30/11/2022.
5. Conservator of Forests Southern Forest Circle Bannu
6. Conservator of Forests Upper Hazara Forest Circle Mardan
7. Conservator of Forests Lower Hazara Forest Circle Abbottabad

Chief Conservator of Forests
Central Southern Forest Region-I
Khyber Pakhtunkhwa Peshawar

CFC
