


28.08.2022

Learned counsel for the appellant present. Mr. Kabir Ullah Khattak, Additional AG alongwith Mr. Nabi Gul, Superintendent for respondents 1 to 6 present.

On previous date publication order was issued, today private respondent No. 10 & 11 submitted application for reliance on the reply of official respondent No. 1 to 6:


No one present on behalf of private respondents despite proper advertisement in daily "Aaj", hence they are proceeded as ex-parte. To ^{come} up for rejoinder/arguments on 30.08.2022 before D.B.


(Fareeha Paul)
Member (E)

30.08.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.


Learned Member (Judicial) Mrs. Rozina Rehman is on leave, therefore, arguments could not be heard. Adjourned. To come up for arguments on 21.11.2022 before the D.B.



(Salah-Ud-Din)
Member(J)

21st Nov, 2022

Lawyers on general strike today.

To come up for Arguments on 17.01.2023 before D.B. Office is directed to notify the next date on the notice board as well as the website of the Tribunal.



(Fareeha Paul)
Member (E)



(Kalim Arshad Khan)
Chairman

24th May, 2022

Counsel for the appellant present. Mr. Muhammad Riaz Khan Painsdakhel, Asstt. AG for the official respondents present.

On previous date private respondents No. 7 to 13 were summoned through registered AD post and the case was adjourned for arguments. Today except respondent No. 11 no other private respondent is in attendance. Notices issued to the respondents are available on file show that those have not been delivered. It also shows that the said respondents cannot be served through ordinary mean. It would be proper to serve respondents No. 7 to 10, 12 and 13 through substituted services by publication of notice in Daily "Aaj" Peshawar. Learned counsel for the appellant is directed to deposit publication expenses within a week time. To come up for reply/comments of private respondents No. 7 to 13 on 28.06.2022 before S.B.


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

30.03.2022

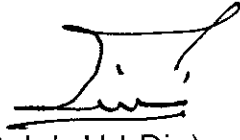
Appellant alongwith counsel present.

Mr. Naseer ud Din Shah learned Assistant Advocate General for official respondents No.1 to 6 present. Private respondents No.7 to 13 are absent.

Previous date was changed on Reader Note, therefore, private respondents No.7 to 13 be summoned through Registered AD and to come up for arguments on 24.05.2022 before the D.B. The appellant shall furnish the registered envelopes for sending notices to private respondents today.



(Rozina Rehman)
Member (J)



(Salah-Ud-Din)
Member (J)



10.06.2021

Appellant present through counsel.

Muhammad Adeel Butt learned Additional Advocate General present.

Former made a request for adjournment. Adjourned. To come up for arguments on 17.09.2021 before D.B.



(Rozina Rehman)
Member (J)



Chairman

17.09.2021

Appellant present through counsel.

Muhammad Adeel Butt learned Additional A.G for official respondents present. Private respondents No.10 & 11 also present. Nemo for remaining private respondents.

Respondents No.10 & 11 stated that they will inform the other private respondents about next date, however, the appellant is also directed to furnish the registered envelopes for sending notices to the remaining private respondents. To come up for arguments on 17.12.2021 before D.B.



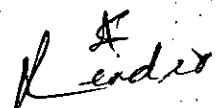
(Rozina Rehman)
Member (J)



Chairman

17-12-21

DB is an laud case to come up
for the same on Dated. 30-3-22


Reader

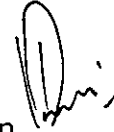
1509/2019

21.09.2020

Appellant in person, Mr. Nabi Gul, Superintendent for respondents No. 1, 2, 3 & 5 and Zakiullah, Senior Auditor for respondent No. 4 & 6 alongwith Addl. AG present. Private respondents No. 10 and 11 in person present.

Mr. Nabi Gul, Superintendent, representative of respondent No. 1, 2, 3 & 5 has furnished parawise comments on behalf of the said respondents which are placed on record. Cost of Rs. 1000/- received from the said representative has been paid to the appellant and receipt to this effect obtained from the appellant which is also placed on record. Other respondents have not furnished reply/comments despite last opportunity. The matter is, therefore, posted to D.B for arguments on 14.12.2020. The appellant may furnish rejoinder, within one month, if so desires.

Chairman



14.12.2020

Junior to counsel for appellant and Mr. Kabirullah Khattak learned Addl. AG for respondents present.

Due to COVID-19 the case is adjourned for the same on 08.03.2021 before D.B.



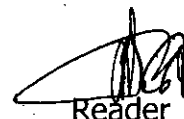
READER

08.03.2021

Nemo for appellant.

Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Due to non-availability of D.B, case is adjourned to 10.06.2021 for the same as before.



Reader

15.06.2020

Appellant in person and Mr. Kabirullah Khattak, Additional AG for the respondents present. Neither written reply on behalf of respondent submitted nor representative of the department is present, therefore, notices be issued to the respondents with the direction to direct the representative to attend the court and submit the written reply on the next date positively. Adjourned to 23.07.2020 for written reply/comments but as a last chance before S.B.



(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

23.07.2020

Appellant himself is present. Mr. Kabirullah Khattak, Additional AG is also present.

Written reply/comments on behalf of respondents have not been submitted so far despite last chance given in the previous order sheet dated 15.06.2020. Last opportunity is extended subject to payment of cost of Rs. 1000/- which shall be borne by the respondents from their own pockets. Notices be also issued to the respondents for submission of written reply/comment for 21.09.2020 before S.B.



(MUHAMMAD JAMAL KHAN)
MEMBER

1509/19

16.12.2019

Counsel for the appellant present.

Essentially the grievance of appellant is that despite having been appointed on 25.04.2004 and regularized on 20.09.2004, his name was not included in the seniority list. Resultantly, at the time of issuance of promotion order dated 26.06.2015 juniors to him were promoted as Junior Clerk while he was ignored against the quota reserved for class-IV employees.

In view of the available record and arguments of learned counsel, instant appeal is admitted to regular hearing subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 07.02.2020 before S.B.

Appellants deposited
Security & Process Fee
16/12/19


Chairman

07.02.2020

Appellant in person and Addl. AG alongwith Muhammad Kashif, ADEO for the respondents present.

Representative of the respondents seeks time to submit reply/comments. Adjourned to 24.03.2020 on which date the requisite reply/comments shall positively be furnished.


(Ahmad Hassan)
Member

24.03.2020

Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 15.06.2020 before S.B.





Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1509/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/11/2019	<p>The appeal of Mr. Muhammad Aman preseted today by Mr. Israr-ud-Din Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR 8/11/19</p>
2-	11/11/19.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>16/12/19</u>.</p> <p> CHAIRMAN</p>
	16.12.2019	<p>Nemo for appeal</p> <p>Notice be issued to appellant/counsel for preliminary hearing before S.B on 27.01.2020.</p> <p> Chairman</p>

2/6

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. 1509/2019

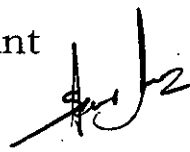
Muhammad Aman. **APPELLANT**

VERSUS

Secretary Zakat, Ushr, SW, SE&WED etc. **RESPONDENTS**

I N D E X

S.No.	Description of Documents	Annex	Pages
1.	Service Appeal		1-8
2.	Affidavit		9
3.	Addresses of the Parties		10-11
4.	Application for Condonation of Delay with Affidavit		12-13
5.	Copy of the Office Memo	A & B	14-15
6.	Copies of Certificate and Bachelor Degree	C	16-22
7.	Copy of the Seniority List	D	23-24
8.	Copy of the Order dated 26.06.2015	E	25-26
9.	Copies of the Departmental Appeals	F to H	27-29
10.	Copies of Writ Petitions and Orders	I to L	30-48
11.	Copy of Order dated 16.01.2019	M	49-53
12.	Copy of Pay Roll		54
13.	Wakalatnama		55

Through Appellant


Israr-ud-Din
& 0345-5997922

Muhammad Anwar Mohmand
Advocates
High Court, Peshawar
0315-8009832

Dated: 07.11.2019

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. _____/2019

Muhammad Aman S/o Amar Khan R/o P.O Shakardara,
Tehsil Lachi, District Lakki, Kohat. Presently employee (Naib
Qasid) at Social Welfare Department, Kohat. **APPELLANT**

VERSUS

1. Secretary Zakat, Ushr, Social Welfare, Special Education & Women Empowerment Department, new DHQ near DHQ Hospital, Kohat.
2. Director, Social Welfare, Special Education & Women Empowerment Department, Jamrud Road, Peshawar.
3. District Officer (DO), Social Welfare, Special Education & Women Empowerment Department, Khyber Pakhtunkhwa, Peshawar.
4. District Accounts Officer, Kohat.
5. Secretary Establishment, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
6. Accountant General (AG), Khyber Pakhtunkhwa, Peshawar.
7. Akhtar Mehmood S/o Sarwar Khan, Sweeper, Office of DO (SW Kohistan) now Junior Clerk (BPS-11).
8. Zahid Khan S/o Muzafar Khan, Naib Qasid, Office of the DO (now Junior Clerk BPS-11), Abbottabad.

9. Fazal Qadir S/o Rehmat Gul, Naib Qasid, Office of DO (now Junior Clerk BPS-11) Dir Upper.
10. Muhammad Ali S/o Kaki Jan, Naib Qasid, Office of DO (SW) Peshawar (Now Junior Clerk BPS-11).
11. Sajjad Ali Shah S/o Ghani, Naib Qasid, Office of DO (SW), Peshawar (now Junior Clerk BPS-11).
12. Abdul Hameed S/o Ajram Khan, Chowkidar, Office of DO (SW), Peshawar (now Junior Clerk BPS-11).
13. Fazal Habib S/o Zadad, Chowkidar, Office of DO (SW), Shangla (now Junior Clerk BPS-11). **RESPONDENTS**

**APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT,
1974 AGAINST THE ORDER OF
RESPONDENT NO.2 DATED 26.06.2015,
WHEREBY RESPONDENT NO.7 TO 13
WERE PROMOTED AND DEPARTMENTAL
APPEAL OF THE APPELLANT HAS NOT
BEEN RESPONDED.**

PRAYER:

**On acceptance of this Service Appeal,
direction may please be issued to
respondents No.1 to 6 to promote the
appellant from post of Naib Qasid Class-IV**

to post of Junior Clerk (BPS-11) from the date of 26.06.2015, whereby private respondents are illegally promoted. Promotion order of respondent No.7 to 13 may also kindly be set aside, being illegal and against the law.

Respectfully Sheweth:

1. That the appellant was appointed as Naib Qasid on temporary basis on 25.04.2004 in Social Welfare Department, Kohat and was later on regularized on the same post w.e.f 20.09.2004 by the respondent No.1 Department. **(COPY OF THE OFFICE MEMO IS ANNEXURE "A" & "B" RESPECTIVELY).**
2. That at the time of initial appointment the qualification of appellant was matriculation and improved by the appellant during service to graduation. **(COPIES OF CERTIFICATE AND BACHELOR DEGREE ARE ANNEXURE "C" & "C1" RESPECTIVELY).**
3. That the Directorate of Social Welfare, Special Education & Women Empowerment Department

prepared a seniority list of employees in Class-IV having minimum qualification of SSC for promotion of Class-IV employees to the post of Junior Clerk in BPS-11 and notified vide No.E-17/56/DSW/Vol-II/10634-37, dated 13.03.2015, but the respondents with malafide intention had not mentioned name of appellant in the said seniority list. **(COPY OF THE SENIORITY LIST IS ANNEXURE "D")**.

4. That on the basis of said seniority list, the Directorate of Social Welfare, Special Education & Women Empowerment Department issued promotion order dated 26.06.2015, whereby respondents No.7 to 13 were promoted from the post of Naib Qasid to the post of Junior Clerk (BPS-11) on reserved quota of promotion in utter disregard of law by depriving the appellant from his right of promotion, being fit and eligible candidate. **(COPY OF THE ORDER DATED 26.06.2015 IS ANNEXURE "E")**.
5. That the appellant for redressal of his grievances filed departmental appeals to respondent No.1 on

different occasions and last appeal on 02.06.2017, but with no response. It is pertinent to mention here that appellant also filed different appeals to other official respondents, but with no response. **(COPIES OF THE DEPARTMENTAL APPEALS ARE ANNEXURE "F", "G" & "H" RESPECTIVELY).**

6. That the prior to the instant appeal, appellant filed Writ Petition No.4379-P/2017, before the Hon'ble High Court on the same cause of action, which was withdrawn with permission to file afresh one and another Writ Petition No.2088-P/2019 on the same subject was filed, in which the appellant was directed to approach the proper forum i.e. Service Tribunal for redressal of his grievances. **(COPIES OF WRIT PETITIONS AND ORDERS ARE ANNEXURE "I", "J", "K" & "L" RESPECTIVELY).**

Now the appellant being aggrieved from the acts of respondents approached this Honourable Tribunal for redressal of his grievance through the instant appeal, on the following grounds;

GROUND S:

- A. That the respondents malafidely and intentionally not mentioned name of the appellant in the seniority list, which is the legal right of the appellant that his name should be mentioned in the seniority list, being the permanent employee of Department from the date of 13.03.2015.
- B. That the respondents with malafide intention denied the due right of the appellant and not mentioned his name in the seniority list, however, their intention clearly depict that the respondents No.1 to 6 were intentionally not included the name of the appellant in the seniority list.
- C. That the appellant has B.A qualification and is still performing his duty as Naib Qasid, while the matriculates/ blue-eyed employees are promoted to the post Junior Clerk, illegally, unlawfully and deprived the appellant from his right of promotion.
- D. That the appellant service experience and educational qualification enable him for promotion,

but the official respondents deprived the appellant of his due seniority, which is the fundamental right of the appellant, this act of the respondents is totally against the law and rules of service.

- E. That the respondents No.7 to 13 promoted to Junior Clerk in BPS-11 by respondents No.1 to 6, who are at Sr.No.40, 49, 50, 51, 72, 73 & 74 of the seniority list of Junior Clerk (BPS-11), Social Welfare, Special Education & Women Empowerment Department, Khyber Pakhtunkhwa dated 16.01.2019 and are junior to the appellant in service, education and experience. *(Copy is Annexure "M")*
- F. That all the employees are to be treated in accordance with law as per Article-4 of the Constitution and action/order of non-including appellant name in seniority list is also not backed by any provision of law, thus such actions/ orders of respondents are in complete violation of Article-5.
- G. That further points will be agitated at the time of arguments with the kind permission of this Honourable Tribunal.


It is, therefore, most humbly prayed that on acceptance of this Service Appeal;

- i. direction may please be issued to respondents No.1 to 6 to promote the appellant from Naib Qasid Class-IV to Junior Clerk (BPS-11) w.e.f 26.06.2015;
- ii. official respondents may further be directed to place name of appellant in the senior part of the seniority list as compare to private respondents;
- iii. declare such non-promotion and non-placing the name of appellant in the seniority list as illegal and ineffective upon rights of the appellant.

Any other relief as deemed appropriate in circumstances of the case, not specifically asked for, may also be granted to the appellant.


Appellant

Through


Israr-ud-Din

&

0345-5997922


Muhammad Anwar Mohmand

Advocates

High Court, Peshawar

0315-8009832

Dated: 07.11.2019

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

Service Appeal No. _____/2019

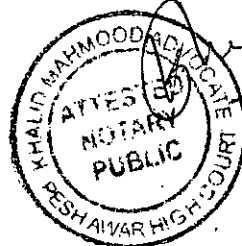
Muhammad Aman. **APPELLANT**

VERSUS

Secretary Zakat, Ushr, SW, SE&WED etc. **RESPONDENTS**

AFFIDAVIT

I, Muhammad Aman S/o Amar Khan R/o P.O Shakardara, Tehsil Lachi, District Lakki, Kohat. Presently employee (Naib Qasid) at Social Welfare Department, Kohat, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



Handwritten signature and date: 2-11-19

Handwritten signature
DEPONENT

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

Service Appeal No. _____/2019

Muhammad Aman. **APPELLANT**

VERSUS

Secretary Zakat, Ushr, SW, SE&WED etc. **RESPONDENTS**

ADDRESSES OF THE PARTIES

APPELLANT:

Muhammad Aman S/o Amar Khan R/o P.O Shakardara, Tehsil Lachi, District Lakki, Kohat. Presently employee (Naib Qasid) at Social Welfare Department, Kohat.

RESPONDENTS:

1. Secretary Zakat, Ushr, Social Welfare, Special Education & Women Empowerment Department, new DHQ near DHQ Hospital, Kohat.
2. Director, Social Welfare, Special Education & Women Empowerment Department, Jamrud Road, Peshawar.
3. District Officer (DO), Social Welfare, Special Education & Women Empowerment Department, Khyber Pakhtunkhwa, Peshawar.
4. District Accounts Officer, Kohat.

5. Secretary Establishment, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
6. Accountant General (AG), Khyber Pakhtunkhwa, Peshawar.
7. Akhtar Mehmood S/o Sarwar Khan, Sweeper, Office of DO (SW Kohistan) now Junior Clerk (BPS-11).
8. Zahid Khan S/o Muzafar Khan, Naib Qasid, Office of the DO (now Junior Clerk BPS-11), Abbottabad.
9. Fazal Qadir S/o Rehmat Gul, Naib Qasid, Office of DO (now Junior Clerk BPS-11) Dir Upper.
10. Muhammad Ali S/o Kaki Jan, Naib Qasid, Office of DO (SW) Peshawar (Now Junior Clerk BPS-11).
11. Sajjad Ali Shah S/o Ghani, Naib Qasid, Office of DO (SW), Peshawar (now Junior Clerk BPS-11).
12. Abdul Hameed S/o Ajram Khan, Chowkidar, Office of DO (SW), Peshawar (now Junior Clerk BPS-11).
13. Fazal Habib S/o Zadad, Chowkidar, Office of DO (SW), Shangla (now Junior Clerk BPS-11).

Through

Israr
Appellant

&

Israr-ud-Din

0345-5997922

Muhammad Anwar Mohmand

Advocates

High Court, Peshawar

0315-8009832

Dated: 07.11.2019

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

In Re:

Service Appeal No. _____/2019

Muhammad Aman. **APPLICANT/APPELLANT**

VERSUS

Secretary Zakat, Ushr, SW, SE&WED etc. **RESPONDENTS**

APPLICATION FOR CONDONATION OF DELAY

Respectfully Sheweth:

1. That applicant has filed the accompanied appeal in which no date of hearing has yet been fixed.
2. That applicant has a prima facie case and balance of convenience also lies in his favour.
3. That the applicant due to wrong advice filed writ petition instead of filing service appeal in such circumstances time consumed before wrong forum in pursuing the case is condonable as per judgment of superior court.
4. That it is always held by the superior courts that cases are to be decided on merit and not on technicalities.
5. That delay in filing appeal is not deliberate/intentional, but due to misconception.

6. That ground of appeal may be considered as part and parcel of instant application.
7. That valuable rights of the applicant are involved and may not be knocked out from door of the court for seeking justice on technical ground.
8. That delay in filing appeal may not be considered a hurdle while deciding appeal on merit.

It is, therefore, prayed that on acceptance of this application, delay in filing appeal may kindly be condoned in the interest of justice.

Applicant/Appellant
Through


Israr-ud-Din

0345-5997922

&


Muhammad Anwar Mohmand

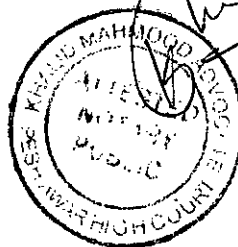
Advocates

High Court, Peshawar

Dated: 07.11.2019

AFFIDAVIT

I, Muhammad Aman S/o Amar Khan, do hereby solemnly affirm and declare on oath that the contents of the **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



DEPONENT

GOVERNMENT OF NWFP
DIRECTORATE OF SOCIAL WELFARE AND
WOMEN DEV: JAMRUD ROAD PESHAWAR.

14
Annex A

Dated Peshawar the 25/5/2004

ORDER

No.E-17/65/DSW/8626-34. On the recommendation of Departmental Selection Committee, Syed Mohammad Aman S/O Awal Khan, R/O Vill: Ghar Kala PO Shakardara Tehsil & District Kohat is hereby appointed as Naib Qasid in the ADP Scheme of the Department titled "Welfare Home Kohat" on the following terms and conditions:

- I- That this appointment shall be purely on contract basis, initially for the period upto 30th June, 2004, however is likely to be extendable on yearly basis.
- II- That the official shall be entitled to get pay Rs. 3017/- per month.
- III- That the contract can be terminated without assigning any reasons, at one month written notice for either side.
- IV- That this appointment shall automatically be terminated on abolition of the Project.
- V- That no TA/DA shall be admissible for joining the duty.
- VI- That this appointment is subject to medical fitness and verification of antecedents.
- VII- On expiry / completion of the contract / Project, services of the appointee in the Project shall stand terminated and shall not confer on the individual any right of absorption elsewhere or regularization of his services.
- VIII- Rest of the terms and conditions will be the same as mentioned in the agreement deed to be properly executed between the appointee and the Directorate of Social Welfare & Women Development NWFP Peshawar.

(Dr.Fakhr-ul-Islam)
Director
Social Welfare & Women
Development NWFP.

Endst: No. & date even.

Copy forwarded to:

- 1- The District Accounts Officer, Kohat.
- 2- The District Officer, Social Welfare Deptt: Kohat.
- 3- The Planning Officer, Directorate of Social Welfare NWFP.
- 4- The Section Officer-II, Social Welfare Deptt: w/r to his letter No.SOII (SW)/Vol-23/3062, dated 24.5.2004.
- 5- PS to Minister, Social Welfare & WDD NWFP Peshawar.
- 6- PS to Secretary, Social Welfare & WDD, NWFP Peshawar.
- 7- The Incharge, Welfare Home Kohat.
- 8- The official concerned.

*Dr. Fakhrest
Home R/O
Blount Sagar*

[Signature]
8/7/04

[Signature]
Director
Social Welfare & Women
Development NWFP.

Attested
[Signature]

OFFICE OF THE DISTRICT COORDINATION OFFICER, KOHAT.

15

To

Mr. Muhammad Aman S/O Awal Khan,
Naib Qasid on fixed pay,
Welfare Home at Kohat.

No. _____
Dated _____
Amul-B
Regularized
20/9/2004

Subject:- REGULARIZATION OF DEVELOPMENT SCHEMES ' CONTINUATION OF RCD PROJECT BADDI MIR ABBAS, BANNU, AND ESTABLISHMENT OF SCHOOL SPECIAL CHILDREN (DEAF & DUMP) AT BANNU AND OTHER ADP SCHEME.

Memo:-

The undersigned is pleased to convert your services from the post of Naib Qasid on fixed pay Rs. 3017/- per month at Welfare Home, Kohat against the regular post of Naib Qasid BPS-1 on contract basis w.e.f 01-7-2004, duly regularized at Welfare Home Kohat by Govt: of NWFP, Zakat Ushr, Social Welfare and Women Dev: Deptt: vide their letter No. PO (SWD) / 9-3 / ADP /2003-04/Vol: III / 3464, dated 10-6-2004, on the following terms & Condition:-

- i. You will be placed in minimum of BPS-1, Rs.1870/- 55-3520 with usual allowances as permissible to Government Servant of the same pay scale.
- ii- Your services will be governed under the Government of NWFP Contract Policy 2002.
- iii- Your initial contract will be for three years, which shall be automatically terminated. However fresh contract would be executed, if the job is required to be continued, subject to your satisfactory performance.
- iv- Either party can terminated the contract on two months notice or two months salary in lieu thereof.
- v- You will be provided equal opportunities for local training.
- vi- You will be provided same facilities under Benevolent Fund as admissible to Government Servant, at the rate to be prescribed by the Government.
- vii- You will avail the benefit of Contributory Provident Fund (CPF) through 5% contribution of minimum of your pay and 5% contribution to be made by the Government.
- viii- You will not contribute to GPF and shall not be entitled for Pension and gratuity benefits.

If the above offer of appointment on contract basis is acceptable to you on the above terms and conditions, you are advised to report to the District Social Welfare officer, Kohat for duty, after medical examination from the Medical Superintendent, Kohat.

Sd/-
District Coordination Officer,
Kohat.

Endst:No. 43236

Dated 20/9/2004

Copy forwarded for information and necessary action to the:-

- 1- Director Social Welfare, NWFP, Peshawar.
- 2- Planning Officer, Zakat Ushr, Social Welfare and Women Dev: Deptt. NWFP, Peshawar with reference to his ltr: No. cited above.
- 3- District Accounts Officer, Kohat.
- 4- PS to DCO, Kohat.
- 5- Superintendent Welfare, Home, Kohat.

S. M. Azam
District Social Welfare Officer,
Kohat.

Attested
GS

Census 1998 Database [x]
There is no record for this individual in the census database. Either no census data was registered, or lacks necessary identity information that could be used for linking the record with this individual.

Other Information that does not appear on card [x]
 Place of Birth کوہاٹ
 Religion Islam
 Mother's Name بی بی ظہورہ

Digital Signature [x]

AHastedd
98

DOMICILE CERTIFICATE

I declare that I was born of parents, who are permanently domiciled in N.W.F.P. having belonged to it by birth/settled in it.



I belong by birth to Village/Mohallah NANDARKA (GHAR KALA)

Tehsil KOHAT District KOHAT

JUB
Signature of the applicant

Pursuance to the declaration dated 20-8-2002 filed by

MUHAMMAD AMAN son/daughter of AWAL KHAN

domiciled in the N.W.F.P. It is hereby certified that the said MUHAMMAD AMAN residents of the N.W.F.P. having belonged to it by birth/settled in it

I have satisfied myself from personal/my knowledge verification through Naib Tehsildar/Tehsildar that the above declaration is true and certify. *Najim ul Shakordara*

This 24th day of August 2002

ATTESTED

COUNTERSIGNED

Aman
District Office
(Rev. & Estate)
Kohat

[Signature]
Deputy District officer
(Rev & Estate) Kohat.
DEPUTY DIST OFFICER

REVENUE & ESTATE
Dispatch Register No 16882/10
Date Of Issue 27/8/2002

(18)
بسم الله الرحمن الرحيم
کے لئے اور ان کے لئے جو ان کے لئے
تشریح (تشریح) کے لئے اور ان کے لئے
بسم الله الرحمن الرحيم

Gul Jaban
General Council
Union Council
Shahdara Rural
Shahdara Rural

[Signature]
Union Council
Shahdara Rural

[Signature]
General Council
Union Council
Shahdara Rural

No. 421 dt 22/8

[Signature]
Secretary
Union Council
Shahdara Rural

ATTESTED
[Signature]
1/2019

Attested
93

S.No.KB 5569

Roll-No. 38028

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

19

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



KOHAT

(N.W.F.P. Pakistan)

Secondary School Certificate Examination

SESSION 2003 (Annual)

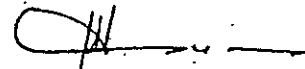
THIS IS TO CERTIFY THAT MUHAMMAD AMAN
Son/Daughter of AWAL KHAN and a
student of GOVT HIGH SCHOOL NANDRAKA SHAKAR DARAH KOHAT has passed
the *Secondary School Certificate Examination* of the Board of Intermediate and
Secondary Education, Kohat held in MARCH, 2003 as a REGULAR
candidate. He/She obtained 452 Marks out of 850 and has been placed in
Grade C Representing Good

The Candidate passed in the following subjects:

- | | | | |
|----------------|-------------------|---------------------|-------------------|
| 1. English | 2. Urdu | 3. Islamiyat | 4. Pak. Studies |
| 5. Mathematics | 6. <u>Physics</u> | 7. <u>Chemistry</u> | 8. <u>Biology</u> |

Date of birth according to admission form is 01-Oct-1984


Asstt. Secretary


Secretary

This certificate is issued without alteration or erasure.

Handwritten signature
ATTESTED 1/2/2019

Handwritten signature
Attested
95

19 (20)

Allama Iqbal Open University Islamabad



Serial No 74322

Certified that *Mr/Ms* MUHAMMAD AMAN
Son/Daughter of AWAL KHAN
Registration No 06-NKT-1099 *Roll No* V-358148
Semester Spring 2008 *having met all the requirements under*
the semester system is this day awarded the

Higher Secondary School Certificate Group - General

He/She has secured 58 *%marks*
and has been placed in C *grade*



Result declared on: February 23, 2009

Date of Issue: July 19, 2010

[Signature]
Controller of Examinations

Note: This certificate is issued without alteration/erasure.
The detail of courses is overleaf.

[Signature]
ATTESTED

[Signature]
Attested
95

Alama Iqbal Open University
Islamabad



21



Serial No 182214

Certified that *Mr/Ms* MUHAMMAD AMAN
Son/Daughter of AWAL KHAN
Registration No 06NKT1099 *Roll No* AE492244
Semester Spring 2011 *having met all the requirements under*
the semester system, is this day awarded the degree of

Bachelor of Arts
Group - General

He/She has secured 63 *% marks*
and has been placed in B *grade*

Handwritten signature

CONTROLLER OF EXAMINATIONS



VICE-CHANCELLOR

Result declared on: February 27, 2012

Date of issue: October 24, 2013

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY.

ATTESTED

Handwritten signature and date: 1/2019

Attested
Handwritten initials

22

Allama Iqbal Open University
Islamabad

~~Annex~~ 6



Serial No 182214

Certified that *Mr/Ms* MUHAMMAD AMAN
Son/Daughter of AWAL KHAN
Registration No 06NKT1099 *Roll No* AE492244
Semester Spring 2011 *having met all the requirements under*
the semester system, is this day awarded the degree of

Bachelor of Arts
Group - General

He/She has secured 63 *% marks*
and has been placed in B *grade*

[Signature]

CONTROLLER OF EXAMINATIONS



[Signature]

VICE-CHANCELLOR

Result declared on: February 27, 2012

[Signature]

Date of Issue: October 24, 2013

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY

[Signature]
SAID AHMED KHAN
DISTRICT COURT KOHAT

Attested
95

ANNEXURE 'D'



23

GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF SOCIAL WELFARE, SPL: EDU: &
WOMEN EMPOWERMENT, JAMRUD ROAD PESHAWAR

Dated Peshawar the 13/03/2015

NOTIFICATION.
O. E-17/56/DSW/Vol-IV/10634-37. In pursuance of Section 8 (1) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule 17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfers) Rules 1989, final seniority list of Matriculate Class-IV employees (BPS-01) of Social Welfare, Special Education & Women Empowerment Khyber Pakhtunkhwa, who possess the qualification of SSC, as it stood on 31.12.2014 is hereby notified for the information of all concerned.

**FINAL SENIORITY LIST OF CLASS-IV EMPLOYEES OF SOCIAL WELFARE, SPECIAL EDUCATION AND WOMEN EMPOWERMENT,
GOVERNMENT OF KHYBER PAKHTUNKHWA WHO POSSESS THE QUALIFICATION OF S.S.C AS STOOD ON 31.12.2014**

S/N	Name of official	Father's Name	Domicile	Designation	Date of birth	Year of passing SSC Examination	Qualification	Date of appointment	Remarks
1	Mr. Jehanzeb Khan	Mohibullah	Dir Lower	Junior Clerk	02.04.1966	1990 (Annual)	SSC	06.04.1988 (As Naib Qasid)	Promoted as J/Clerk on 01.03.2002
2	Mr. Muhammad Arif	Najaf Khan	Abbottabad	Junior Clerk	15.03.1968	1990 (Supply)	FA	01.06.1989 (Naib Qasid)	Promoted as J/Clerk on 24.02.2002
3	Mr. Abdul Wadood	Abdul Manan	Mardan	Junior Clerk	15.06.1966	1981 (Annual)	SSC	01.07.1989 (As Chowkidar)	Promoted as J/Clerk on 02.05.2002

Attested
95

13/03/15

(23-A)

4	Mr. Farhad Jamil	Abdul Sartar	Peshawar	Junior Clerk	17.04.1959	1994 (Annual)	FA	11.10.1992 (As Chowkidar)	Promoted as J/Clerk on 06.01.2007
5	Syed Zakir Ali Shah	S. Attaullah Shah	Kohat	Junior Clerk	12.10.1975	1989 (Annual)	BA	04.05.1995 (As Chowkidar)	Promoted as J/Clerk on 30.05.2007
6	Mr. Fazle Rabbi	Abdul Ghani	Swabi	Junior Clerk	01.12.1975	1992 (Annual)	SSC	15.06.1993 (As Naib Qasid)	Promoted as J/Clerk on 01.06.2007
7	Mr. Arshad Saleem	Dost Muhammad	Charsadda	Junior Clerk	08.09.1973	1989 (Supply)	SSC	19.05.1994 (As Chowkidar)	Promoted as J/Clerk on 01.06.2007
8	Mr. Hazrat Badshah	Gul Badshah	Peshawar	Junior Clerk	08.01.1974	1991 (Annual)	SSC	11.10.1992 (As Naib Qasid)	Promoted as J/Clerk on 05.01.2010
9	Mr. Noor Said	Shah Said	Peshawar	Junior Clerk	03.03.1969	1996 (Supply)	SSC	15.08.1993 (As Mal)	Promoted as J/Clerk on 05.01.2010
10	Mr. Muhammad Ali	Kaki Jan	Mardan	Junior Clerk	29.12.1979	1996 (Annual)	FA	25.02.2008 (As Naib Qasid)	Promoted as J/Clerk on 20.08.2011
11	Syed Sajid Ali Shah	S. Ghani shah	Peshawar	Junior Clerk	05.02.1982	1998 (Annual)	SSC	29.02.2008 (As Naib Qasid)	Promoted as J/Clerk on 20.08.2011
12	Mr. Abdul Hamid	Ajram Khan	Malakand Agency	Junior Clerk	14.03.1973	1991 (Annual)	SSC	14.03.2008 (As Chowkidar)	Promoted as J/Clerk on 20.08.2011
13	Shahryar Khan	Amanullah Khan	Dir Lower	Sweeper	12-01-1966	1990 (Supplementary)	SSC	07-04-1988	
14	Muhammad Rehman	Fazal Ghani	Swat	Assitt Cook	07-04-1972	1990 (Annual)	SSC	16-06-1992	
15	Hazrat Hussain	Abdul Manan	Buner	Chowkidar	01-01-1974	1993 (Supply)	FA + 6 month Certificate in IT	22-02-1992	
16	Muhammad Yasin	Waris Khan	Karak	Naib Qasid	04-02-1975	1994 (Annual)	SSC	(01-03-1996,As	Result

Attested

AS

6

12/10/11

24

17	Muhammad Iqbal	Farid Khan	Swat	Naib Qasid	19-04-1955	1996 (Supply)	SSC	Chowkidar. (10-03-1999, As Naib Qasid)	declared on 15.07.2008
18	Muhammad Iqbal	Ghulam Muhammad	Peshawar	Naib Qasid	01-04-1970	1997 (Supply)	SSC		
19	Akhtar Mahmood	Sarwar Khan	Haripur	Sweeper	10.01.1974	1991 (Annual)	SSC	01.07.2004	
20	Walayat Ali Shah	Syed Sultan Shah	Haripur	Mali	10-02-1977	1994 (Annual)	FA	01.07.2004	
21	Khurshid Ali	Muhammad Rasool	Swat	Cook	01-04-1974	1998 (Annual)	SSC	11-01-2005	
22	Hazrat Ayub	Muhammad	Swat	Naib Qasid	21-04-1974	1992 (Annual)	SSC	01-07-2007	
23	Arniad Iqbal	Younas	Swat	Naib Qasid	10-02-1976	1994 (Annual)	SSC	01-07-2007	
24	Zalid Khan	Fazal Abad	Peshawar	Naib Qasid	13-04-1977	1996 (Annual)	SSC	01-07-2007	
25	Gohar Rehman	Muzafar Khan	Swat	Chowkidar	07-03-1985	2001 (Annual)	F.A	01-07-2007	
26	Qamar Ali Khan	Aziz ur Rehman	Bannu	Naib Qasid	12-06-1966	1984 (Annual)	SSC	01-07-2008	
27	Fazli Qadir	Gul Nawaz Khan	Mardan	Naib Qasid	16-06-1972	1987 (Annual)	BA + 6 months certificate in IT	03.03.2008	
28	Riaz Ullah	Rehmat Gul	Charsadda	Naib Qasid	20-03-1978	2008 (Annual)	SSC	18-06-2007	
29	Umar Ali Khan	Abdul Qadir	Bannu	Chowkidar	20-07-1970	1987 (Annual)	F.A	01-07-2008	
30	Azmatullah	Ghazi Marjan	Charsadda	Chowkidar	01-05-1977	1997 (Annual)	SSC	01-07-2008	
31	Mukarram Khan	Adam Khan	Peshawar	Chowkidar	12-12-1982	2000 (Supply)	SSC	04-02-2009	
32	Adil Khan	Khan Muhammad	Peshawar	Naib Qasid	05-01-1990	2007 (Annual)	BA	26-08-2010	
33	Ajmal Sadig	Raees Khan	Peshawar	Sweeper	15-03-1986	2008 (Annual)	SSC	30-11-2010	
34	Muhammad Sohail	Shah Zarin	Malakand	Chowkidar	05-04-1992	2010 (Annual)	SSC	28-01-2011	
35	Jehan Sarwar	Asmat Ullah	Malakand	Chowkidar	01-04-1977	1994 (Supply)	SSC	16-04-2011	
36	Faid Sultan	Ghulam Sarwar	Buner	Chowkidar	09-01-1987	2003 (Annual)	SSC	27-04-2011	
37	Ghulam Saeed	Sher Sultan	Swabi	Naib Qasid	04-01-1989	2006 (Supply)	SSC	27-04-2011	
38	Bahat Zameen Shah	Sultan Saeed	Swabi	Water Man	05-02-1974	1991 (Annual)	MA Islamiyat	01-07-2011	
39	Noor Ullah	Islam Shah	Mardan	Chowkidar	12-03-1988	2003 (Supply)	FA	01-07-2011	
		Abdur Rab	Charsadda	Chowkidar					

Attested
BS

17/1/08

(24-A)

40	Muhammad Farooq Khan	Gul Akbar Khan	Bannu	Chowkidar	06-06-1979	1996(Annual)	M.A/B.Ed/Com puter Diploma	11-11-2011	
41	Zahir Ullah	Jehangir Khan	Charsadda	Chowkidar	02-01-1981	1997 (Annual)	F.A	01-11-2012	
42	Akhtar Munir	Hussain Ahmad	Charsadda	Naib Qasid	24-07-1988	2005 (Annual)	F.A	01-11-2012	
43	Aamir Khan	Kabir Khan	Peshawar	Naib Qasid	04-05-1993	2009 (Supply)	FA	01-02-2012	
44	Shaheen Niaz	Niaz-Muhammad	Kohat	Aya	15.11.1966.	2011 (Annual)	SSC	22.09.1994	
45	Khurshid Ali	Bakht Jehan	Swat	Chowkidar	12-01-1978	2012 (Annual)	SSC	01-09-1996	
46	Arniad Ali Khan	Mir Ahmad Khan	Peshawar	Chowkidar	28-03-1983	2013 (Annual)	SSC	14.10.2009	
47	Yousaf Shah	Qalandar Shah	Swabi	Chowkidar	10-12-1997	2014 (Annual)	SSC	24-03-2012	
48	Muhammad Hihal Khan	Haji Ayub Khan	Peshawar	Chowkidar	23-03-1994	2009 (Annual)	BA+Diploma in IT	03-06-2014	

Copy forwarded to:

1. All the District Officer, Social Welfare in Khyber Pakhtunkhwa with the remarks to circulate the same amongst the official concerned working in your sub-offices.
2. The Manager, Artificial Limbs Workshop Peshawar.
3. The Assistant Director (Admin) Directorate of Social Welfare.
4. PA to Director, Social Welfare.

Asstt: Director
(Establishment)

Asstt: Director
(Establishment)

Attested
AS

(1)

Annex E

25

Recd

Government of Khyber Pakhtunkhwa
Directorate of Social Welfare, Special Education and
Women Empowerment Jamrud Road Peshawar.

Date Peshawar the 26/6/2015

ORDER:

No. E-17/56/DSW/VI-III 9.175-24 On recommendation of the Departmental Promotion Committee in its meeting held on 12/05/2015 the following Matriculate Class-IV employees of Social Welfare, Special Education and Women Empowerment Department Khyber Pakhtunkhwa are hereby promoted as Junior Clerk (BPS-11) under 33% quota reserved for promotion of Matriculate Class-IV with immediate effect and posted against the vacant posts shown in Column-3

S.No	Name & Designation of official with place of present posting	Posted against the vacant post as a Junior Clerk (B-11) at
1	2	3
	Shahriyar Khan, Sweeper, Office of the Principal, School for Deaf Children Timergara Dir Lower	Office of the DO (SW) Chitral
2	Hazrat Hussain, Chowkidar, Office of the DO (SW) Buner	Office of the DO (SW) Tor Ghar
3	Muhammad Yasin, Naib Qasid Office of DO (SW) Karak	Office of the DO (SW) Karak
4	Muhammad Iqbal, Naib Qasid Office of the Superintendent GIB (Male) Peshawar	Office of the Manager, Center for Mentally Retarded & PHC Haripur
X ✓ 5	Akhtar Mahmood, Sweeper Office of the Manager, MR&PHC, Haripur	Office of the DO (SW), Kohistan
X ✓ 6	Zaid Khan, Naib Qasid Office of the DO (SW) Peshawar	Office of the DO (SW) Abbottabad
X ✓ 7	Fazle Qadir, Naib Qasid Office of the Superintendent Darul Aman, Mardan	Office of the DO (SW) Dir Upper

The above officials will remain on probation for a period of one year under Section 15 (Part-V) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989. No request for change of station of posting will be entertained for which offer is accepted before completion of his normal tenure of service.

Sd/-

Director (SW, SE&WE)

Copy forwarded to:

1. The Accountant General, Khyber Pakhtunkhwa
2. The District Accounts Officers, Dir Lower Chitral, Tor Ghar, Buner, Karak, Kohistan, Kohistan, Abbottabad, Mardan & Dir Upper
3. The District Officer, Social Welfare, Dir Lower, Buner, Karak, Peshawar, Mardan, Mardan, Chitral, Tor Ghar, Karak, Kohistan, Abbottabad, Dir Upper.
4. Principal, School for Deaf Children Timergara Dir Lower.
5. Superintendent, Govt. Institute for the Blind (Male) Peshawar
6. Manager, Center for Mentally Retarded & Physically Handicapped Children Haripur
7. Superintendent, Darul Aman Mardan.
8. The officials concerned.
9. PA to Director Social Welfare Khyber Pakhtunkhwa.

Attested
93

Assistant Director
(Establishment)

26

Regd

Better copy

Government of Khyber Pakhtunkhwa
Director of Social Welfare, Special Education and
Women Empowerment Jamrud Road, Peshawar

ORDER:

No. E-17/56/DSW/Vol-III/ 2175 - 84 . On recommendation of the Department Promotion Committee in its meeting held on 12.5.2015 the following matriculate class IV Employees of Social Welfare Special Education and Women Empowerment Department Khyber Pakhtunkhwa are hereby promoted as Junior Clerk (BPS-II) under 5395, quota reserved For promotion of Matriculation Class-IV with immediate effect and posted against the vacant post. Shown on Column 3.

S. No.	Name & Designation of Official with place of present posting	Posted against the vacant post as a Junior Clerk(B - II) at
1	2	3
	Shahryar Khan, Sweeper Office Of the Principal, School for Deaf Children Timergara Dir Lower.	Office of the DO(SW) Chitral
2	Hazrat Hussain, Chowkidar Office of the DO (SW) Buner	Office of the DO(SW) Tor Ghar
3	Muhammad Yasin, Naib Qasid Office of the DO (SW) Karak	Office of the DO(SW) Karak
4	Muhammad Iqbal, Naib Qasid Office of the Superintendent GIB (Men) Peshawar.	Office of the Manager Center for Mentally Returned & PLC Haripur
5	Akhtar Mehmood, Sweeper Office of the Manager, MR & PHC Haripur	Office of the DO(SW), Kohistan
6	Zahid Khan, Naib Qasid Office of the Do (SW) Peshawar	Office of the Do (SW) Abbottabad
7	Fazle Qadir, Naib Qasid Office of the Superintendent Darul Aman Mardan	Office of the Do (SW) Dir Upper

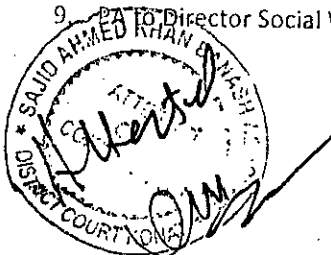
The above Officials will remain on probation for a period of one year under section 15 (Part -V) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer, Rules, 1989. No request for change of station of posting will be entertained for which offer accepted before completion of his normal tenure of service.

Sd/-
Director (SW, SE & WE)

Copy forward to

1. The Accountant General Khyber Pakhtunkhwa
2. The District Account Officer Dir Lower Chitral, Tor Ghar, Buner, Karak, Haripur, Kohistan, Abbottabad, Mardan, Dir Upper.
3. The District Officer Social Welfare Dir Lower, Bannu, Karak, Peshawar, Haripur, Mardan, Chitral, Tor Ghar, Karak, Kohistan; Abbottabad, Dir Upper.
4. Principal School for Deal Children Timergara, Dir Lower.
5. Superintendent, Govt Institute to the Blind (Male) Peshawar.
6. Manager, Center for Mentally Retarded Mardan & Physically Handicapped children Haripur
7. Superintendent Darul Aman, Mardan
8. The Official concerned.
9. To Director Social Welfare Khyber Pakhtunkhwa

Assistant Director
(Establishment).



Attested
98

ANEX F

27

The Secretary,
Zakat, Ushr, SW, SE & WE Deptt,
Khyber Pakhtunkhwa.

THROUGH PROPER CHANNEL

Subject: DEPARTMENTAL APPEAL.

Respected Sir,

It is stated I submitted an appeal to the Director, Social Welfare on 02.03.2017 through proper channel as to why I was deprived of my basic right of promotion as Junior Clerk under the quota reserved for the Class-IV employees (copy attached at Flag-A).

So far no information / intimation about my appeal has been received to me even after lapse of 108 days.

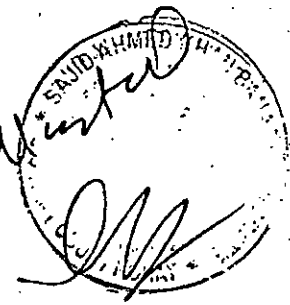
Now, as per rules, I have no option but to lodge departmental appeal to next higher authority i.e. Honourable Secretary, Zakat, Ushr, SW, SE & WE Department, Khyber Pakhtunkhwa for the redressal of my genuine grievances, please.

I hope that my case will be settled by your good self on merit, please.

*Pls put up and forward it
to Secretary Zakat, Ushr, SW & WE Deptt, KP*

Yours Obediently,

Muhammad Aman
Muhammad Aman,
Naib Qasid,
Welfare Home, Kohat

Attested


Attested
93

23/06/2017

Amer use G

28

To

The District Officer,
SW, SE & WE Deptt, Kohat.

Through Proper Channel

Subject: DEPARTMENTAL APPEAL.

R / Sir,

1- It is stated that I, Muhammad Aman s/o Awal Khan r/o Shakardara, Tehsil Lachi, Distt Kohat has been serving under your kind but vigilant control since 01.07.2004 as "Naib Qasid" in Welfare Home, Kohat on regular basis. I have always served my duty to God and up to the satisfaction of my high ups. I was matriculate of the time of my appointment but have upgraded my education up to BA.

2- With humble submission, the undersigned wants to draw your attention to the seniority list notified vide E-17/56/DSW/Vol-II/10634-37 dated Peshawar the, 13.03.2015 (copy attached at flag-A Sr No. 10, 11 & 12). On the same seniority list I was bypass and junior persons were promoted to the post of Junior Clerks which was my due right under service rules, even my name was not included in the same seniority list.

3- I was once again deprived of due promotion vide Order No. E-17/56/DSW/Vol-III/2175-84 dated 26.06.2015 (copy of order attached at Flag-B).

4- Your kind honour is requested to kindly ponder over para 2 and 3 that why I was not treated equally, justly and under the relevant rules / service rules etc violating my basic right and take up the case with the Directorate for appropriate remedial action, please.

Looking forward for your early consideration, please.

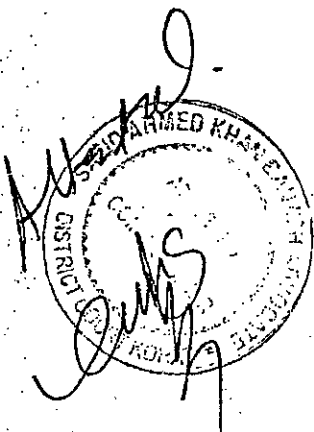
Yours Obediently,

Muhammad Aman
Muhammad Aman,
Naib Qasid,
Welfare Home, Kohat.

*Pls forward to
the Directorate of
S.W.*

2/3/17

*Attested
SS*



29

To

The Director
SW, SE&WE, Kohat.

Subject: **DEPARTMENTAL APPEAL**

Respected Sir,

It is stated that I Muhammad Aman S/o Awal Khan R/o Shakardara Tehsil Lachi, District Kohat and now as a "Naib Qasid" in Welfare Home i.e. in Social Welfare Department also regularized from 20.09.2004, your kind information that my name is not mentioned in the post of Class-IV seniority list - 2013, which is my due and legal right that the department mentioned my name as a Class-IV in next seniority list issued by the department.

Your kind honor may be pleased to issue direction to the Department to mention my name in next Class-IV seniority list.

Dated: 03.10.2014

Aman
Yours Obediently,

Muhammad Aman
Naib Qasid
Welfare Home, Kohat

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR.Writ Petition No 2088P of 2019

Muhammad Aman S/o Awal Khan
R/o PO Shakardara Tehsil Lachi District Lakki Kohat
presently employee (Naib Qasid) at Social Welfare
Deptt: Kohat.



..... Petitioner

VERSES

- 1- District Officer (DO) Social Welfare, Special Education and Women Empowerment Deptt: Near DHQ Hospital KDA Kohat.
- 2- Director Social Welfare, Special Education and Women Empowerment Deptt: Jamrud Road, Peshawar.
- 3- Secretary Zakath, Ushar, SW, SE and WE Deptt: Khyber Pakhtunkhwa Secretariat Peshawar
- 4- District Accounts Officer Kohat
- 5- Accountant General (AG) Khyber Pakhtunkhwa, Peshawar
- 6- Secretary Establishment, Khyber Pakhtunkhwa Civil Secretariat Peshawar.
- 7- Akhtar Mahmood (Sweeper) Office of the DO (SW Kohistan) Now Junior Clerk
- 8- Zahid Khan (Naib Qasid) Office of the DO (now Junior Clerk) Abbottabad
- 9- Fazal Qadar (Naib Qasid) Office of the DO (Now Junior Clerk) Dir Upper
- 10- Muhammad Ali S/o Kaki Jan (Naib Qasid) Now Junior Clerk DO (SW) Peshawar.
- 11- Sajjad Ali Shah S/o Ghani (Naib Qasid) Now Junior Clerk DO (SW) Peshawar.
- 12- Abdul Hameed S/o Ajram Khan (Chowkidar) Now Junior Clerk DO (SW) Peshawar.
- 13- Fazal Habib S/o Zadad (Chowkidar) Now Junior Clerk DO (SW) Shangla.

..... Respondents

-FILED TODAY

Deputy Registrar

30 MAR 2019

ATTESTED

EXAMINER

WRIT PETITION UNDER ARTICLE 199. OF
THE ISLAMIC REPUBLIC OF PAKISTAN 1973.

Respectfully Sheweth:

- 1- That the Petitioner is the law abiding citizen and hail from District Kohat.
- 2- That the petitioner was appointed as Naib Qasid as temporary basis w.e.f on 25/03/2004 in Social Welfare Deptt: Kohat and was later on regularized on the same post w.e.f 01/07/2004 by the Government of Khyber Pakhtunkhwa, Zakat Ushar, Social Welfare and Women Dev: Deptt vide their Letter No.PO (SWD)/9-3/ADP/2004 vide Endst No.432-36. (Copy of Office Memo is annexed as Annexure "A").
- 3- That at the time of initial appointment the educational qualification was Matriculation which during course of his employment the petitioner improved and attained bachelor degree i.e: BA.
- 4- That the Directorate of Social Welfare, Special Education and women empowerment prepared a seniority list of employees in Class - IV having minimum qualification SSC for promotion of Class - IV employees to the posts of junior clerks in BPS - 11 and notified vide E-17 /56

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30 MAR 2019

ATTESTED

WP2088-2019- Mohammad Aman vs. DO Social Welfare Full PG 54

EXAMINER

the seniority list and not included which is acted against the law which is not vested to them. (Copy of Seniority List is annexed as Annexure "E").

7- That the petitioner for the redressal of his grievances through departmental appeal before the Secretary Zakat, Usher, SW, SP and WE Deptt Khyber Pakhtunkhwa, but the respondents have no response to the petitioner. (Copy of Departmental appeal is annexed as Annexure "F").

8- That the petitioner before the instant writ petition on the same cause of action earlier writ petition No.4379-P/2017 as withdrawn to file fresh writ petition on the same cause of action. (Copy of writ petition is annexed as Annexure "G").

9- That feeling aggrieved from the act of the respondents no other adequate remedy and hence the petitioner assail the proceeding of the respondents through the instant writ petition before this Hon'ble on the following grounds inter-alia:

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30 MAR 2019

ATTESTED

EXAMINER

Grounds:

- A) That the respondents have acceded the power and authority vested in them and their act reflect the malafide intention and as such have infringed the fundamental rights of the petitioner guaranteed under the constitution.
- B) That the respondents by their conduct have deliberately and purposely delayed and malafidely and intentionally not mentioning the name of the petitioner in the all seniority list, this act of the respondents is against the law and rules of service.
- C) That the respondents with malafide intention denied the due rights of the petitioner as they purposely and deliberately ignored the due right of the petitioner which he is eligible and entitled for the said rights so this act of the respondents against the law and fundamental rights of the petitioner as

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 30 MAR 2019

well as against the constitutional rights of the petitioner, so the respondents may graciously be directions to the respondent to mention the name of the petitioner in the First Seniority list along with all back benefits.

D) That the petitioner valuable rights were involved and the petitioner was going to be overage.

E) That as per law and rules the petitioner was entitled for due rights but the respondents intentionally and deliberately delayed and denied this right of the petitioner, however, their intention clearly depict that the respondents were not interested mentioning the name of the petitioner in seniority list.

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30 MAR 2019

F) That it is highly misfortune of this nation that the skill and experty of the experts are

ATTESTED

EXAMINER

not properly utilized and they are teased and tortured to such extent that they then seek for the livelihood jobs.

G) That despite the availability of high talented elements in this society the goal of development and progress could not be achieved because due place and due rights are not given to the deserving person and those entitled for a particular place are not given to the petitioner.

H) That the petitioner approached the proper forum through proper channel that as to say before the District Officer and Secretary of Social Welfare, Special Education Officer and Women Empowerment Deptt: dated 02/03/2017 and 23/06/2017 respectively this availing all the options available but so far no intimation to the petitioner has been made.

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30 MAR 2019

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EXAMINER

I) That the respondents by including the name of the petitioner in the seniority list and ignoring him as whole has caused the violation of the petitioner fundamental and constitutional rights which he is entitled for the said rights.

J) That the petitioner service experience and educational qualification enable him senior cum fit for his promotion as to the above stated order but however, but the respondents deprived the petitioner of his due seniority, which is the fundamental rights of the petitioner, this act of the respondents is totally against the natural justice as well as violation of the constitution.

K) That the respondents promoted those persons / employees the Class - IV employees which is serial No.5,6 and 7 and Serial No.40,49,50 and 51 are junior to the petitioner either in service or education as well as an experience.

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30 MAR 2019

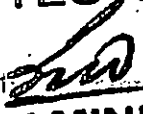
ATTESTED

EXAMINER

WP2088-2019- Mohammad Aman VS DO Social Welfare Full PG 54

30 MAR 2019

Advocate

ATTESTED

EXAMINER

WP2088-2019- Mohammad Aman VS DO Social Welfare Full PG 54

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR.

Writ Petition No. 2078P of 2019

Muhammad Aman Petitioner

VERSES

District Officer (DO) Social Welfare, Special Education and Women Empowerment Deptt: Near DHQ Hospital KDA Kohat and others Respondents

Affidavit

I, Muhammad Aman S/o Awal Khan R/o PO Shakardara Tehsil Lachi District Lakki Kohat presently employee (Naib Qasid) at Social Welfare Deptt: Kohat. do hereby solemnly affirm and declare on oath that the accompanied writ petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Aman
DEPONENT

CNIC # 14301-7139110-9

Cell # 0332-9655921

Identified by

Hasan Zaib

Hasan Zaib Rahim
Advocate

High Court Peshawar

No.	21995
Certified that	the above is a true and correct copy of the affidavit
day of	Khad 19
at	Muhammad Aman
who	Kohat
Who is present	Hasan Zaib

FILED TODAY

Deputy Registrar

30 MAR 2019

CERTIFIED TO BE TRUE COPY

Examiner
Peshawar High Court, Peshawar
Authorized Under Article 177 of
the Qanun-e-shahadat Order 1987

24 OCT 2019

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR.Writ Petition No. 20887 of 2019,Muhammad Aman **Petitioner**VERSESDistrict Officer (DO) Social Welfare, Special Education
and Women Empowerment Deptt: Near DHQ Hospital
KDA Kohat and others **Respondents**Addresses of the parties**Petitioner**

Muhammad Aman S/o Awal Khan
R/o PO Shakardara Tehsil Lachi District Lakki
Kohat presently employee (Naib Qasid) at Social
Welfare Deptt: Kohat.

Respondents

- 1- District Officer (DO) Social Welfare,
Special Education and Women
Empowerment Deptt: Near DHQ Hospital
KDA Kohat.
- 2- Director Social Welfare, Special Education
and Women Empowerment Deptt: Jamrud
Road, Peshawar.
- 3- Secretary Zakath, Ushar, SW, SE and WE
Deptt: Khyber Pakhtunkhwa Secretariat
Peshawar
- 4- District Accounts Officer Kohat
- 5- Accountant General (AG) Khyber
Pakhtunkhwa, Peshawar
- 6- Secretary Establishment, Khyber
Pakhtunkhwa Civil Secretariat Peshawar.
- 7- Akhtar Mahmood (Sweeper) Office of the
DO (SW Kohistan) Now Junior Clerk
- 8- Zahid Khan (Naib Qasid) Office of the DO
(now Junior Clerk) Abbottabad
- 9- Fazal Qadar (Naib Qasid) Office of the DO
(Now Junior Clerk) Dir Upper

FILED TODAY
Deputy Registrar
30 MAR 2019

- 10- Muhammad Ali S/o Kaki Jan (Naib Qasid)
Now Junior Clerk DO (SW) Peshawar.
- 11- Sajjad Ali Shah S/o Ghani (Naib Qasid)
Now Junior Clerk DO (SW) Peshawar.
- 12- Abdul Hameed S/o Ajram Khan
(Chowkidar) Now Junior Clerk DO (SW)
Peshawar.
- 13- Fazal Habib S/o Zadad (Chowkidar) Now
Junior Clerk DO (SW) Shangla.

Dated 27/02/2019

Through

[Signature]
 Petitioner
[Signature]
 Hasan Zaib Rahim
 Advocate
 High Court Peshawar

ATTESTED

[Signature]

EXAMINER

FILED TODAY
 Deputy Registrar
 30 MAR 2019

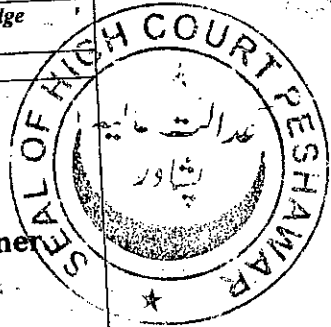
[Signature]
 CERTIFIED TO BE TRUE COPY
 EXAMINER
 Peshawar High Court Peshawar
 Authorised Under Section 20
 of the Gramin-Shahada Ordinance
 24 OCT 2019

Amir J

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PESHAWAR HIGH COURT, PESHAWAR
ORDER SHEET

Date of Order or Proceedings	Order or others Proceedings with Signature of Judge
1	2
17.10.2019	<p><u>W.P No.2088-P/2019 with IR.</u></p> <p>Present: Mr. Hassan Zaib Rahim, Advocate, for the petitioner</p> <p>*****</p> <p><u>MUSARRAT HILALI, J.-</u> The instant writ petition has been filed by the petitioner under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, wherein he has prayed that the respondents may be directed to promote him from the post of Naib Qasid to BPS-11.</p> <p>Arguments heard and appended record gone through.</p> <p>2. Admittedly, the petitioner is a civil servant and his grievance relates to the terms and conditions of service, so, the appropriate remedy for seeking his redressal would surely be the Services Tribunal, as there is a complete</p>



ATTESTED


EXAMINER

Amanur (K)

44

IN THE HIGH COURT OF PESHAWAR

Writ Petition No. 4379/2017

Muhammad Aman s/o Awal Khan

Residence of P/O Shakardara, Tehsil Lachi, District Kohat

Presently employee (Naib Qasid) at Social Welfare Deptt. Kohat

..... Petitioner

VERSUS

1. District Officer (D.O), Social Welfare, Special Education and Women Empowerment Deptt., Near DHQ Hospital, K.D.A, Kohat
2. Director Social Welfare, Special Education and Women Empowerment Deptt., Jamrud Road, Peshawar
3. Secretary Zakat, Ushr, SW, SE and WE Deptt., KP Secretariat, Peshawar
4. District Accounts Officer, Kohat
5. The Accountant General (A.G), Khyber Pakhtunkhwa
6. Secretary Establishment, KP Secretariat, Peshawar

..... Respondents

Writ Petition under Article 199 of the Constitution of Islamic Republic of Pakistan

Respectfully Sheweth:

On Facts:

1. That the petitioner was appointed as Naib Qasid on temporary basis w.e.f 25-03-2004 in Social Welfare Deptt. Kohat and was later regularized on the same post w.e.f 01-07-2004 by Govt. of NWFP, Zakat Ushr, Social Welfare and Women Dev; Deptt. vide their letter no. PO (SWD) / 9-3 / ADP

Filed Today
Incharge,
Sub-Registry, Kohat
20 OCT 2017

Attested
95

/ 2003-04/Vol: III / 3464 dated 10-06-2004 and through memo dated 20-09-2004 vide Endst: No. 432-36.

(Copy of office memo attached as annex-A).

2. That at the time of initial appointment the educational qualification of petitioner was matric which, during course of his employment, he improved and attained Bachelor's Degree i.e. B.A.

3. That the Directorate of Social Welfare, Special Education and Women Empowerment prepared a seniority list of employees in Class- IV having minimum qualification SSC for promotion of Class-IV employees to posts of Junior Clerks in BPS-11 and notified vide E-17/56/DSW/Vol-III/10634-37 dated 13-03-2015. But ironically the even the name of petitioner was not included in that list.

(Copy of notification attached as annex-B)

4. That based on the previously stated seniority list, the Directorate of Social Welfare, Special Education and Women Empowerment issued a list of Class-IV employees to fill the vacant positions of Junior Clerk in BPS-11 by promotion against their 33% Quota reserved vide Order No. E-17/56/DSW/Vol-III/2175-84 dated 26-06-2015. But once again the petitioner was deprived from his promotion.

(Copy of order attached as annex-C)

5. That feeling aggrieved with the said order, the petitioner invokes the jurisdiction of this Hon'ble Court upon following grounds.

Grounds:

a. That the petitioner's service experience and educational qualification enabled him senior cum fit for his promotion as per to the above sated order

Filed Today
In Charge
Sub-Registry, Kohat
20 OCT 2017

Attested
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however he was deprived of his due seniority. The Class-IV employees at serial No. 5, 6 and 7 are junior to petitioner either in service or education.

b. That by not including his name in the seniority list and ignoring him as a whole has caused the violation of petitioner's fundamental right.

c. That the petitioner approached the proper forums through proper channel that is to say before the District Officer and Secretary of Social Welfare, Special Education and Women Empowerment Deptt., dated 02-03-2017 and 23-06-2017 respectively thus availing all the options available, but so far no intimation to the petitioner has been made.

d. That all citizens stand equal before law and no discrimination is to be made but despite petitioner's service tenure and qualifications, his right to promotion has been neglected thus affecting his service and performance.

Prayers:

It is therefore humbly prayed to this august court for following:

1. That the petitioner may kindly be promoted to BPS-11 by directing the relevant authorities as per the rules.

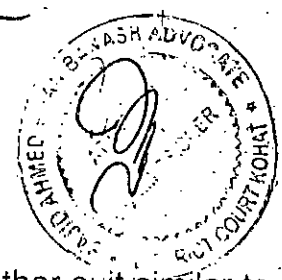
2. That Ex-post Facto sanction may kindly be granted accordingly in this regard.

Place:

Dated: 20 October, 2017

Filed Today ()
In charge,
Sub-Registry, Kohat.
20 OCT 2017
Petitioner.

Through
ABRAHMAN
Advocate
Distt Courts Kohat



Certificate:

I, Muhammad Aman, do hereby solemnly affirm that no other suit similar to the above mentioned title is pending before any other court throughout in Pakistan.

Attested
GS

IN THE HIGH COURT OF PESHAWAR

47

Writ Petition No. 4379 / 2017

Muhammad Aman

Petitioner

VERSUS

District Officer Social Welfare and others

Respondents

AFFIDAVIT

I, Muhammad Aman (Petitioner through Counsel), do hereby solemnly affirm on oath that the contents of the accompanying Writ Petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Signature of ABRAR ALAM, Advocate, District Courts Kohat



Signature of DEPONENT

20/10/17

Filed Today, Sub-Registry, Kohat, 20 OCT 2017

Notarized box containing: No. 45, Certified that the above was verified on solemnly Affirmation before me in office, this 20th Day of Oct 2017 by Muhammad Aman s/o. Awal Khan r/o. Shakardara who was identified by Sajid Khan Advocate who is personally known to me. Oath Commissioner, Peshawar High Sub-Registry.

Amr... L...)

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PESHAWAR HIGH COURT, PESHAWAR.

FORM 'A'
FORM OF ORDER SHEET

Date of Order or Proceedings	ORDER OR PROCEEDINGS WITH SIGNATURE OF JUDGE/JUDGES
1	2
15.02.2019	<p><u>W.P. No.4379-P/2017.</u></p> <p>Present: Mr. Ibrar Alam, Advocate, for the petitioner Mr. Rabnawaz Khan, AAG for respondents.</p> <p>***</p> <p><u>QALANDAR ALI KHAN, J:-</u> After initial arguments, when it was pointed out to the learned counsel for the petitioner that the petitioner was earlier not promoted as his name was not included in the seniority list notified on 13.03.2015, and that his name, according to the learned AAG, figured at Sr.No.11 of the seniority list dated 31.11.2017; the learned counsel for the petitioner wants to withdraw the instant writ petition and seeks permission to file afresh one on the same cause of action.</p> <p>The instant writ petition is, therefore, dismissed as withdrawn; with permission to the petitioner to seek remedy available to him under the law in the appropriate forum subject to all just and legal objections.</p> <p style="text-align: right;">JUDGE</p> <p style="text-align: right;">JUDGE</p>

Ayub

Hon'ble Mr. Justice Qalandar, Ali Khan & Hon'ble Mr. Justice Muhammad Ayub Khan

091-9724253
ORDER



Amirul M

ATTESTED

GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF SOCIAL WELFARE, SPL: EDU &
WOMEN EMPOWERMENT, JAMRUOD ROAD PESHAWAR

Dated Peshawar the 16/06/2019

No. E-17/17/DSW/Vol-6/4625-28 In pursuance of Section 8 (1) & (5) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule 17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfers) Rules 1989, Tentative Seniority List of D/Cs (BPS-44 - J, Social Welfare, Special Education & Women Empowerment Department, Khyber Pakhtunkhwa) as stood on 31.12.2018 is hereby circulated for the information of all concerned.

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S. #	Name	F/Name	D.O.B	Domicile	Qualification	Date of 1 st Entry into Govt. Service	Date of appointment/promotion to the present post	Place of present posting	Remarks
1	Sardar Bahadar	Dildar Khan	3-03-1966	Haripur	BA	09-10-1988	09-10-1988	DO SW Haripur	The DPC decided that the official may be differed for four years vide Notification No. SOR-VI(E&AD)1-3/2009/Vol-III, dated 22.10.2011
2	Akbar Ali	Dilawar	1-05-1966	Mardan	MA	14-05-1991	14-05-1991	G I B Mardan	
3	Muhammad Ismail	Ghulam Mursaleen	18-12-62	Chitral	SSC	18-05-1991	18-05-1991	M R Centre Chitral	
4	Tagweem Ulhaq	Muhammad Sherin	15-4-1971	Dir (L)	FA	18-05-1991	18-05-1991	DO SW Dir (L)	
5	Muhammad Altaf	Mumtaz Khan	9-08-1970	Mansehra	BA	25-05-1991	25-05-1991	DO SW Mansehra	
6	Hamayun Khan	Qasim Jan	1-03-1966	Peshawar	BA	01-10-1991	01-10-1991	M R Centre Peshawar	
7	Sajid Rashid	Muhammad Rashid	3-10-1969	Kohat	SSC	29-10-1987 (Chowkidar)	03-02-1992 (As I/C)	Deaf Centre Kohat	
8	Saeed Ijaz	Ghulam Nabi	14-4-1962	Swabi	SSC	08-02-1992	08-02-1992	DO SW Swabi	
9	Nadeem Ashraf	Muhammad Ashraf	22-12-1968	Abbottabad	SSC	23-2-1992	23-02-1992	DO SW Abbottabad	
10	Ghani Ur Rahman	Said Ur Rahman	1-04-1971	Dir (L)	BA	01-04-1992	01-04-1992	DO SW Dir (L)	
11	Zahir Shah	Ahmad Gul	11-3-1970	Mardan	SSC	20-04-1992	20-04-1992	S.E.C Mardan	
12	Aslam Khan	Abdul Rahman	1-06-1969	Peshawar	MA	16-06-1992	16-06-1992	GIR (S) Peshawar	

Attested
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16/06/2019

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13	Akbar Khan	Wazir Khan	15-4-1972	Swat	FA	04-07-1993	04-07-1993	DO SW Swat
14	Baber Sadig	Muhammad Sadig	16-3-1965	Mansehra	SSC	31-08-1986 (i/Clerk)	14-11-2001 (Adjusted from surplus)	Sp Edu Centre Mansehra
15	Jehanzeb	Mahibullah	2-04-1966	Dir (I)	SSC	06-04-1988 (N/Qasid)	01-03-2002 (Promoted)	DO Malakand
16	Muhammad Arif	Najaf Khan	15-3-1968	Abbottabad	FA	01-06-1989 (N/Qasid)	24-02-2002 (Promoted)	DO SW Abbottabad
17	Abdul Wadood	Abdul Manan	15-6-1966	Mardan	SSC	01-07-1989 (Chowkidar)	02-05-2002 (Promoted)	G I B Abbottabad
18	Amir Muhammad Khan	Mirza Ali Khan	22-12-1971	Kohat	FA	22-12-1991 (Forest Guard)	30-06-2002 (Adjusted from surplus)	DO SW Hangu
19	Amanullah Shah	Noor Zali Shah	24-3-1969	Bannu	SSC	07-10-2003	07-10-2003	MR Centre Bannu
20	Abdul Ghaffar	Haji Shah Jehan	2-04-1977	D I Khan	M. Com	28-04-2004	28-04-2004	G I B D I Khan
21	Mashal Khan	Mugrab Khan	---	Bannu	BA	01-07-2004	01-07-2004	DO SW Bannu
22	Zia Ur Rahman	Mehtar Dad	24-3-1969	Bannu	BA	26-8-1996	03-05-2006 (Adjusted from surplus)	Deaf Centre Bannu
23	Saifullah Khan	Raiyatullah Khan	5-03-1976	Kohat	BA	01-07-2006	01-07-2006	RCDA Kohat
24	S. Kamal Khan	Inayat Khan	15-4-1977	D I Khan	D. Com	01-07-2006	01-07-2006	SW UCD Project D I Khan
25	Amir Mahmood	FazalMabood	6-04-1982	Swat	FA	01-07-2006	01-07-2006	G I B Centre Swat
26	Farhad Jamil	Abdul Sattar	17-4-1959	Peshawar	FA	11-10-1992 (Chowkidar)	06-01-2007 (Promoted)	G I B Male Peshawar
27	S Zakir Ali Shah	S Attuallah Shah	12-10-1975	Kohat	BA	04-05-1995 (Chowkidar)	30-05-2007 (Promoted)	DO SW Kohat
28	Fazle Rabi	Abdul Ghani	1-12-1975	Swabi	SSC	15-06-1993 (N/Qasid)	01-06-2007 Promoted	G I B Swabi
29	Arshad Saleem	Dost Muhammad	8-09-1973	Charsadda	SSC	19-05-1994 (Chowkidar)	01-06-2007 (Promoted)	DO SW Charsadda
30	Muhammad Islam	Abdul Hasib	5-04-1980	Mardan	MA	01-07-2007	01-07-2007	DarulKafala Male beggars Pesh
31	Muhammad Nawaz Ali Jan	Jan Ali	01-09-1981	Charsadda	MA, B, Ed	01-07-2007	01-07-2007	MRRP, Peshawar
32	Shoukat Hayat	Gulzar Khan	2-01-1977	Batagram	SSC	06-10-2007	06-10-2007	DO SW Battagram

ATTACHED
17/09/07

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ATTESTED

[Signature]

First Appointment

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33	NaikBadshah	Saif Ur-Rahim	3-04-1979	Dir (I)	M.Com	01-07-2008	01-07-2008	R C D A Dir (I)	
34	MuslahUd Din	Umer Din	8-02-1980	Malakand	FA	01-07-2008	01-07-2008	GSDC Malakand	
35	Halim Gul	Hameed Gul	13-4-1982	Dir (I)	MA	01-07-2008	01-07-2008	DO AdinZai Dir (I)	
36	Irfan Ullah	Ikramullah	N.A	Mardan	N.A	21-10-2008	21-10-2008	D.O SW, Mardan	
37	Irshad Ahmad	Masru Khan	4-02-1976	Abbottabad	BA	07-11-2008	07-11-2008	W.H Abbottabad	
38	Wajid Ali	BakhtRawan	1-01-1985	Swat	BA	21-02-2009	21-02-2009	DO SW Swat	
39	Noor Said	Shah Said	3-03-1969	Peshawar	SSC	15-08-1993 (Mail)	05-01-2010 (Promoted)	Sarkari SaralPeshawar	
40	Fazal Habib	Zardad	5-06-1975	Shangla	FA	01-07-2008 (Chowkdar)	04-02-2010 (As J/Clerk)	DO SW Shangla	<i>[Signature]</i>
41	Muhammad Saleem	Muhammad Faqir	15-6-1978	Dir (I)	MA	13-02-2010	13-02-2010	SW Centre Jandul at SamarBagh	
42	Taus Khan	Bashir Ullah Khan	8-04-1982	Bannu	BA	13-03-2010	13-03-2010	D O Bannu	
43	Muhammad Yousef	Muhammad Aslam	15-4-1976	Peshawar	FA	09-05-2010	09-05-2010	DO SW Charasadda	
44	Khan Sher	Wali Muhammad	1-01-1962	Peshawar	SSC	01-06-1981 (Lino operator)	30-09-2010 (Adjusted from surplus)	DO SW Peshawar	
45	Nasrullah	Muhammad Ayaz Khan	2-05-1968	North Waziristan	SSC	21-07-1993 (Store Keeper)	15-01-2011 (Adjusted against J/Clerk)	SW UCD Project D I Khan	
46	Adnan	HazratUllah	28-3-1986	Swabi	M.Sc	30-06-2011	30-06-2011	DO SW Swabi	
47	Naveed Ijaz	AfsarUllMulk	12-9-1977	Nowshera	FA	01-07-2011	01-07-2011	DO SW Nowshera	
48	Sohail Khan	Dawar Khan	15-2-1986	Peshawar	B.Sc	01-07-2011	01-07-2011	DO SW Nowshera	
49	Muhammad Ali	Kaki Jan	29-12-1979	Mardan	FA	25-2-2008 (N/Qasid)	20-08-2011 Promoted	DSW Peshawar	<i>[Signature]</i>
50	Sajid Ali Shah	S. GhaniShah	5-02-1982	Peshawar	SSC	29-2-2008 (N/Qasid)	20-08-2011 Promoted	DSW Peshawar	<i>[Signature]</i>
51	Abdul Hamid	Ajram Khan	14-3-1973	Malakand	SSC	14-03-2008 (Chowkdar)	20-08-2011 Promoted	DSW Peshawar	<i>[Signature]</i>
52	Faisal Akbar	Raza Akbar	15-3-1987	Swabi	BA	28-10-2011	28-10-2011	DSW Peshawar	
53	Daulat Khan	Khushrang Khan	2-01-1984	Peshawar	FA	31-10-2011	31-10-2011	DSW Peshawar	
54	Waqas Ali Khan	Zafar Ali	17-5-1992	Peshawar	FA	31-10-2011	31-10-2011	DSW Peshawar	

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55	Umer Sharif	Ulas Khan	10-10-1983	Peshawar	BA	01-11-2011	01-11-2011	DSW Peshawar	
56	QazifazliKhuda	Qazi Ali Akbar	13-1-1988	Peshawar	FA	28-10-2011	28-10-2011	DSW Peshawar	
57	WaqarUllMulk Khan	Abdul Malik Khan	2-02-1986	Peshawar	FA	31-10-2011	31-10-2011	DSW Peshawar	
58	Junaid Khan	Fazal Hussain	20-4-1992	Mardan	F.Sc	31-10-2011	31-10-2011	DO SW Mardan	
59	Muhammad Nasir	Muhammad Aslam	12-12-1991	Peshawar	BBA (Hon)	16-11-2011	16-11-2011	DO SW Peshawar	
60	Jamil Ahmad	Sultan Khan	27-9-1977	Mardan	DAE	26-12-2011	26-12-2011	DarulKafalaMardan	
61	Bait Ullah	Taj Muhammad	12-8-1971	Karak	FA	21-03-13	21-03-2013	DSW Peshawar	
62	Muhammad Nazir	Aurang Zeb	21-7-1981	Swat		01-04-2014	01-04-2014	DarulKafala Swat	
63	Jawad Amin	Amin-ul-Haq	17-4-1989	Charsadda	BA	05-05-2014	05-05-2014	DO SW Charsadda	
64	AbdurRehman	Afzal Khan	5-3-1991	Swat		5-5-2014	5-5-2014	RCDA Swat	
65	Kifayatullah	Mosam Din	08-04-1986	LakkiMarwat	MBA/PTC	12-11-2014	12-11-2014	DO SW LakkiMarwat	
66	Hamid Jan	Muhammadi Gul	11-3-1989	Charsadda	MA	12-11-2014	12-11-2014	DO SW Charsadda	
67	Waleed Bin Saleem	Muhammad Saleem	02-5-1991	Haripur	MA (Spl Edu)	02-3-2015	02-3-2015	School for Deaf Haripur	
68	Shahriyar Khan	Amanullah Khan	12-01-1966	Dir Lower	SSC	07-04-1988 (Sweeper)	01-07-2015 (Promoted)	DO Chitral	
69	Hazrat Hussain	Abdul Manan	01-01-1974	Buner	FA	22-02-1992 (Chowkidar)	30-06-2015 (promoted)	D.O, Social Welfare, Buner	
70	Muhammad Yasin	Waris Khan	04-02-1975	Karak	SSC	01-03-1996 Chowkidar	30-06-2015 promoted	D.O, Social Welfare, Karak	
71	Muhammad Iqbal	Ghulam Muhammad	01-04-1970	Peshawar	SSC	02-04-1988 (N.Q)	30-06-2015 promoted	Supdt. GIB (G) Peshawar	
72	Akhtar Mehmood	Sarwar Khan	10-01-1974	Haripur	SSC	01-07-2004 (Sweeper)	01-07-2015 promoted	D.O, Social Welfare, Kohistan	
73	Zahid Khan	Muzafar Khan	13-04-1977	Peshawar	SSC	01-07-2007 (N.Q)	01-07-2015 promoted	D.O, Social Welfare, Abbottabad	
74	FazliQadir	Rehmat Gul	16-06-1972	Mardan	B.A	03-03-2008 (N.Q)	01-07-2015 promoted	GSDC Takht Bhai Mardan	
75	Mr.SherDil Khan	Ayub Khan	25-02-1992	Peshawar	B.Sc	11-07-2017	11-07-2017 promoted	DSW	
76	Mr.Bilawal Khan	Muhammad Umar	20-03-1992	Charsadda	B.Sc	10-09-2018			
77	Mr.Asif Khan	Qadeem Khan		Charsadda		19-09-2018			

APPROVED

APPROVED 93

53

53

- Copy forwarded to:
- 1- The Section Officer of SW, SE&WE, Khyber Pakhtunkhwa.
 - 2- The Assistant Director (Admn) Directorate of SW, SE&WE Khyber Pakhtunkhwa.
 - 3- All the District Officer, Social Welfare in Khyber Pakhtunkhwa.
 - 4- The officers at S.No. 2 & 3 above are requested to circulate the above Tentative seniority list amongst the incumbents and submit any objection / correction / addition within 15 days of the receipt of this letter.

SR

[Signature]
Assistant Director (Estab)

[Signature]
Assistant Director (Estab)

ATTESTED

[Signature]
12/1/2019

Attested
BS

54



GOVERNMENT OF PAKISTAN
ACCOUNTANT GENERAL KHYBER PAKHTUNKHWA
DISTRICT Kohat
PAYROLL SYSTEM

PAYMENT ADVICE

P Sec: 092 Month: December 2017
KT6108 - Welfare Home Kohat

Pers #: 00161325 Buckle:
Name: MUHAMMAD AMAN
NAID QASID
CHIC No. 1430171291109

WELFARE HOME KOHAT
RTR: 0.
GPA #: 0.
Old #: 14384530654

Interest Applied
BPS 04 Active Temporary

DEPT CODE KT6108 -0

PAYS AND ALLOWANCES:		
0001-Basic Pay		15,180.00
1000-House Rent Allowance		972.00
1210-Convey Allowance 2005		1,785.00
1300-Medical Allowance		1,500.00
1933-Integrated Allowance (2005)		450.00
2149-15% Adhoc Relief All-2013		347.00
2159-Adhoc Relief Allow 10%		243.00
2311-Adhoc Relief All 2016 10%		1,235.00
2324-Adhoc Relief All 2017 10%		1,518.00
Gross Pay and Allowances		23,230.00
DEDUCTIONS:		
GPF Balance 83,498.00		
3501-Benevolent Fund		
4004-R. Benefits & Death Comp:		
	Subtr:	830.00
		300.00
		451.00
		1,581.00
		21,649.00
Total Deductions		

NET AMOUNT PAYABLE 21,649.00

QUALIFYING SERVICE
YRS MON
13 Years 06 Months 00

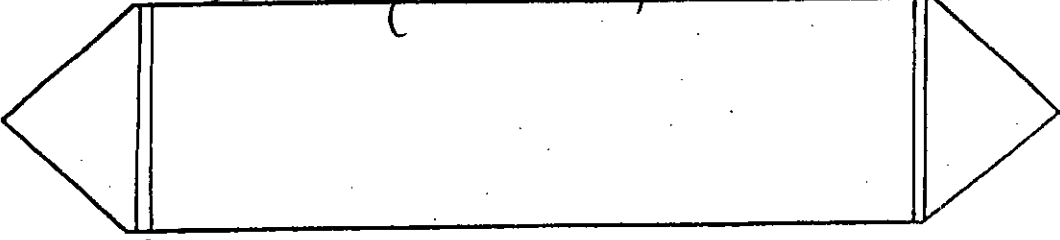
D. O. B.
21.10.1984
Days

IFP Quota:
NATIONAL BANK OF PAKK. D. A (KOHAT DEV AUT
CA 1563-4

Muhammad
Qasid

Muhammad
SS

بعد التسمیس ٹریبونل لیشاؤ



2 منجانب اپیلینٹ
محمد امان بنام گورنمنٹ وغیرہ
S.A No / 019

موزخہ - 8-11-2019

مقدمہ - پیرو جوشین کسین

دعویٰ

جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی دکل کاروائی متعلقہ
آن مقام لیشاؤ کیلئے محو اسمہ دادا لیشاؤ اینڈ محمد الود صہندرا ٹریبونل

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرفہ یا اپیل کی برآمدگی اور منسوخ
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا ادکالت نامہ لکھ دیا کہ سندر ہے۔

الرقوم 8-11-2019 ماہ نومبر 2019

العبادہ واہ العباد

کے لئے منظور ہے۔

Attested

Accepted by
M-15828 Advocate

M. Anwar Mohmand
Advocate

بمقام لیشاؤ

"B"

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

No.

S.B

Appeal No. *1509* of 20*19*

Muhammad Aman Appellant/Petitioner

Versus

Suy. Zakat, Ushar Kohat Respondent

Respondent No. *1*

Regt

Notice to:

*Secretary Zakat, Ushar, Social welfare
Special Education & Women Empowerment
Deptt: now DHQ near DHQ Hospital Kohat.*

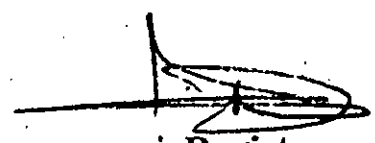
WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on *7/2/2020* at **8.00 A.M.** If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing **4 copies** of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this *24*.....

Day of *Jan*.....20 *20*



**Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.**

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

“B”

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

No.

S.B

Appeal No.....*1509*..... of 20 *19*

Muhammad Aman.....Appellant/Petitioner

Versus

Sing Zakat Ust. Khatt.....Respondent

Respondent No.....*2*.....

Regd

Notice to:

*Director, Social welfare, special Education
 & Women Empowerment Deptt. Jamrud Road
 Peshawar*

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....*7/2/2019*.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this.....*5th*.....

Day of.....*Jan*.....20*20*.....



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

S.B

Appeal No. 1509 of 20 19
Muhammad Aman Appellant/Petitioner

Sey Zakat Ushir Kohat. Respondent

Respondent No. 3

Regd.

Notice to: — Distt: Offices (DO), Social Welfare
Special Education & Women Empowerment
Deptt: Peshawar.

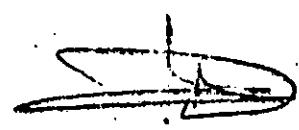
WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

S.H

Given under my hand and the seal of this Court, at Peshawar this.....
Day of.....Jan 20 20



**Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.**

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

"B"

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

No.

Appeal No. 1509 of 20 19
Muhammed Aman Appellant/Petitioner

Sey Zakat Ushk Kohat Respondent

Respondent No. 4
Distt. Accounts Officer
Kohat

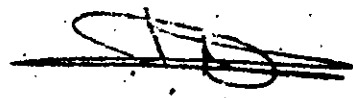
Notice to: Regd.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated..... 8/k

Given under my hand and the seal of this Court, at Peshawar this.....
Day of.....Jan 20.....20



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

S.B

No.

Appeal No. 1509 of 2019

Muhammad Aman Appellant/Petitioner

Versus

Sevj Zakat ush & Kohat Respondent

Respondent No. 7

Read

Notice to:

Akhtar nichwood s/o Sarwar Khan
Sweeper Office of DO (SW Kohistan) Now Junio
clerk B13 II

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 7/1/2020 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this 8/1/20

Day of Jan 20 20

**Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.**

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

"B"

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

No.

Appeal No. 1509 of 20 19
Muhammad Aman

Appellant/Petitioner

Seyy Zakat ^{Versus} Usho Kohat.

Respondent

Respondent No.

Zahid Khan s/o Muzafar Khan Naib Qasid

Notice to:

Office of the DO (Now Junior Clerk BPS II
Abbottabad.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. dated: 8/15

Given under my hand and the seal of this Court, at Peshawar this
Day of Jan 20 20



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Appeal No..... of 20^{S.B}

1509.

19

Muhammad Aman

Appellant/Petitioner

Versus

Sey Zakat Ushy Kohat

Respondent

Respondent No.....

9

Recd

Notice to:

Fazal Qadir s/o Rehmat Gul, Naib Ga
Office CF DO (Now Junior Clerk 1875-11)

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on..... at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

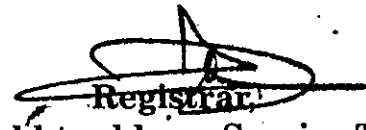
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Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No..... dated.....

Given under my hand and the seal of this Court, at Peshawar this..... 8th.....

Day of..... Jan 20


Registrar

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Appeal No. ¹⁵⁰⁹ Muhammad Aman of 20 ¹⁹ S.B
Appellant/Petitioner

Sey Zakat versus Ushr Kovat
Respondent

Respondent No. Muhammad A/s/o Kaki Jan, Naib Qas
Office of DO (SW) Peshawar (Now Junico (10
BPS-11) Dig up

Notice to: —

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 7/2/2020 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated..... 8th

Given under my hand and the seal of this Court, at Peshawar this Jan 20
Day of.....20

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
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"B"

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

No.

S.B.

Appeal No.....1509..... of 20/9

Muhammad Aman.....Appellant/Petitioner

Versus

Sony Zakat Ushh Kohat.....Respondent

Respondent No...11.....

Red

Notice to: —

Sajjad An Shah s/o Ghani, Naib Qasid
Office CF DO (SW) Peshawar (Now Junior Clerk. BP)

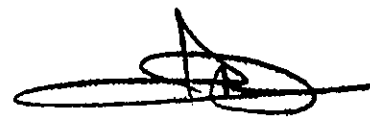
WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....7/2/2020.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this.....8th.....

Day of.....Jan.....2020



Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

**JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.**

S.B

No.

Appeal No. 1509 of 20 19
Muhammad Aman Appellant/Petitioner

Sury Zakant Usha Rohat Respondent

Regd

Respondent No. 5/0 Abdul Hamid Ajram Khan, Chowkidar

Notice to: - Office of DO (SW) Peshawar (Now Junior Clerk (BPS-11))

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this~~

office Notice No.....dated.....

8th

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

Day of.....Jan 20.....20

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

S-13

Appeal No. of 20

1509

19

Appellant/Petitioner

Muhammad Aman

versus

Respondent

Seyy Zakat ushr Kohut

Respondent No.

13

Recd

Notice to: —

Fazal Habib s/o Zadaad, Chowkidar.
Office of DO (SW) Shangila (Now Junior Clerk)

WHEREAS an appeal/petition under the provision of the North West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

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

8th

Day of.....20

Jan 20



Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

Appellant/Petitioner Sajid Zakaif Uski Rehat
Respondent 6

Assit: Accounts Officer
D/O A.G. Khyber Pakhtunkhwa

Accountant (General)
Peshawar

Respondent No. _____
Appellant/Petitioner No. _____

Appeal No. 1509 of 20 19
Muhammad Aman

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal at 8:00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.
Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. _____ dated _____.

Given under my hand and the seal of this Court, at Peshawar this _____
Day of _____ 20 _____



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

S.B

Appeal No.....1509..... of 2019

Muhammad Aman.....Appellant/Petitioner

Versus

Sey Zakat Ushy Korat.....Respondent
Respondent No...S.....

Notice to: —

Secretary Establishment
Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....7/2/2020.....at 8.00 A.M. If you wish to urge anything against the appellan/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this...8th.....

Day of.....Jan.....2020

8/2/20
21/01/20

Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

S.B

No.

Appeal No. *1509* of 20*19*
Muhammad Aman
Appellant/Petitioner

Secy Zakat Ushr - Kohat
Respondent

Respondent No. *1*
Secretary Zakat Ushr Social Welfare
Special Education & Women Empowerment
near DHO Hospital Kohat.

Notice to: —

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this *24/5*.....

Day of *June*.....20*20*



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

S.B

No.

Appeal No.....1509..... of 20 19

.....Muhammad Amir.....Appellant/Petitioner

Versus

.....Saeed Zameer Usmani.....Respondent

Wohat

Respondent No.....2.....

Notice to: —

Director Social Welfare Special
Education & Women Empowerment Deptt.
Jamrud Road Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....23/7/19.....at 8.00 A.M. If you wish to urge anything against the appellat/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this.....24/7/19.....

Day of.....July.....20 19

Registrar
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Appeal No. 1509 of 20 19
Muhammad Iqbal Appellant/Petitioner
Sajid Zakir Usht Respondent

Respondent No. 3
Distt. Office (DO) Social Welfare
Special Education & Women Empowerment
Deptt. Peshawar

Notice to:

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this.....
Day of..... June 20 20

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

SB

No.

Appeal No. *1502* of 20 *10*

Muhammad Arif Appellant/Petitioner

Versus

Sy. Zahid Ullah Khan Respondent

Respondent No. *4*

Notice to: —

*D-13+1 Account Officer
Kohat.*


WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on *23/7/2010* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this *24/7/10*

Day of.....20

June 20


Registrar
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

SB

No.

Appeal No. 1509 of 20 19

Muhammad Aman Appellant/Petitioner

Syed Zakat Usho Kohat Respondent

Respondent No. 7

Notice to: -

Akhtar Mahmood S/o Sarwar Khan
Sweepers Office of (DO) SW Kohistan

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 23/7/2020 at 8.00 A.M. If you wish to urge anything against the appellants/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement along with any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 24/7/20

Day of June 2020


Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Appeal No..... of 20

S.B

Appellant/Petitioner

Muhammad Iqbal
versus
Mansoor

Respondent

Sayid Zawat Respondent No. *1*

Notice to: —

Zahid Khan % Muzaf Khan
Officer in Charge of Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellent/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

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

Day of.....20

June 20

2/6/18

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

“B”

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

No.

PS

Appeal No..... *1509* of 20 *19*

Muhammad Appellant/Petitioner

Versus

Govt. Zakat Ushw. Ishtak Respondent

Respondent No..... *9*

Notice to: —

*Raza Qadir s/o Rehmat Gul
Naib Qasid Office of Do
Dir Upper*

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on..... *23/7/2020* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this..... *24/7/20*

Day of..... *June* 20 *20*



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

SB

Appeal No..... 1750 of 20 17

Muhammad Aman Appellant/Petitioner

Versus

Mr. Zameer Ullah Khan Respondent

Respondent No..... 10

Notice to: —

Muhammad A. S. M. Maki Jari No. 20
Office of DO (SW) Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on..... 27/7/2017 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this..... 26/7/17

Day of..... July 20 20

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR. 813

No.

1509
Appeal No. of 20 19
Mubhammad Amin

Appellant/Petitioner

Shayzaat versus Shihab

Respondent

Respondent No.

Sajjad Ali Shah S/o Chhatar

Notice to: -

Naib Qaid Chhatar Da (Sik) Now
Junior Clerk Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

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

Day of..... June 20 20 19

Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

S.B

No.

Appeal No..... 1519 of 20 19

Muhammad Ali Appellant/Petitioner

Versus

Secy. District Shikohabad Respondent

Respondent No..... 1

Notice to:

Abdul Hamid S/o Aftab Khan
Chowkidar Office of DC (S&D) Peshawar
New Jinnah chowk

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on..... 25/7/2019 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this..... 24/7/19

Day of..... June 20

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

SB

Appeal No. *1577* of 20 *19*

Muhammad Aman Appellant/Petitioner
Versus

Say Zaidat Ullah Khan Respondent
Respondent No. *12*

Notice to: — *Razal Habib, 3/0 Zaidat Chowkidar,
Office of Do (SW), Shanyda Now Jynior
Clerk.*

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at **8.00 A.M.** If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing **4 copies** of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

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

Day of.....*June*.....20 *20*

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Appeal No. 1509 of 20 17

Muhammed Anwar Appellant/Petitioner

Secy Zakat Ushs Kohat Respondent

Respondent No. 5

Notice to: —

Secretary Establishment
Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on..... 23/7/2018 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

~~Copy of appeal is attached.~~ Copy of appeal has already been sent to you vide this

Office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this..... 24/7

Day of..... June 20

PS/Secy E&AD KP
Diary No. _____
ITS No. _____
Date. _____

[Signature]

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Recd

Appeal No.....1509..... of 2019

.....T. Muhammad Aman.....Appellant/Petitioner

Versus

.....Secy Zakat Ushr Kohat.....Respondent

Respondent No.....1.....

Notice to:

Secretary Zakat, Ushr, Social Welfare, Special
Education & Women Empowerment Dept: New
DHO near DHO Hospital Kohat.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....21/9/2020.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this.....9th.....

Day of.....Sep.....2020

Last chance for reply

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Appeal No..... of 20

1509

19
Appellant/Petitioner

Muhammad Aman

Respondent

Secy Zakat Ushv. Kohat.

Respondent No.....

2

Notice to:

Director, Social Welfare, Special Education
& Women Empowerment Deptt: Jamrud Road

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellany/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

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

9th

Day of.....20

Sep 20

Last chance for reply

M Registrar

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.
Regd

Appeal No. 1509 of 20 19
Muhammad Aman Appellant/Petitioner

Sayy Zakat ushy Kohat, Respondent

District Officer (DO), Social Welfare Special Respondent No. 3

Notice to: Education & Women Empowerment Deptt. KP
Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 21/9/2018 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

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

Day of..... Sep 20 20

Last chance
for reply

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Appeal No. of 20

1509

19

Recd

..... Appellant/Petitioner

Muhammad Aman

..... Respondent

Secy Zakat ushy Kohat;

Respondent No.

4

Notice to:

Distt: Accounts Officer Kohat.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellan/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

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

9/12

Day of.....20

Sep 20

(Last chance for Reply)

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Recd

Appeal No.....1509..... of 2019.

Muhammad Ayman.....Appellant/Petitioner
Versus

Secy Zakat ushr Kohat,.....Respondent

Respondent No.....7.....

Notice to:

*AKhtar Mehmood s/o Saywar Khan, Sweeper,
office of the Do (Sw Kohistan) now Junior Clerk*

WHEREAS an appeal/petition under the provision of the North West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....21/9/2020.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this.....9th.....

Day of.....Sep.....2020.

*Last chance
for Reply*

M. A. J.
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

Reg No. 2

1509

19

Muhammad Aman of 20

Appellant/Petitioner

Secy Zakat Versus Kohat

Respondent

Zahid Khan s/o Muzaffar Khan Naib Qasid,

Notice to: Office of The Do (now Junior Clerk BPS-11).
Abbottabad

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

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

Last chance for Reply

Day of.....20

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Regg
 Appeal No. 1509 of 2019.

Muhammad Aman Appellant/Petitioner

Versus

Secy Zakat Ushr Kohat Respondent

Respondent No. 9

Notice to: —

Fazal Qadir s/o Rehmat Gul. Naib Qasid
Office of Do (now Junior Clerk BPS-11) Dir Upper.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 21/9/2020 at 8:00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.


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

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

Given under my hand and the seal of this Court, at Peshawar this 9th.....

Day of.....Sep.....2020.

(Last chance
for Reply)


 Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

"B"

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

No.

Regd

Appeal No. 1509 of 20 19
Muhammad Aman Appellant/Petitioner

Versus
Sey Zakat Ushr Kohat Respondent

Respondent No. 10

Notice to: —

Muhammad Ali s/o Kaki Jan Naib Qasid
Office of Do (SW) Peshawar (Now Junior Clerk BPS-11)

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

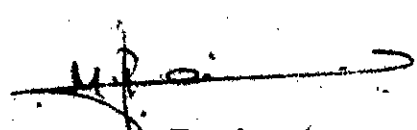
Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No.....dated.....

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

Day of.....20

Last chance for Reply

9/12
Sep 20

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Lead

Appeal No. 1509 of 20 19

Muhammad Aman Appellant/Petitioner

Versus

Secy Zakat Ushy Kohat Respondent

Respondent No. 11

Notice to:

Sajjad Ali Shah S/o Ghani, Naib Qasid,
Office of Do (Sw), Peshawar. (Now Junior Clerk BPS-11)

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 21/9/2020 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 9th

Day of Sep 20^o.

(Last chance for Reply)

[Signature]
 Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

“B”

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

No.

Appeal No.....1509..... of 20 19

.....Muhammad Aman.....Appellant/Petitioner

Versus

.....Secy Zakat Ushr Kohat.....Respondent

Respondent No.....12.....

Notice to: — Abdul Hamid s/o Ajram Khan, Chowkidar,
Office of Do(SW), Peshawar (now Junior Clerk BPS-11),

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....21/9/2020.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this.....9th.....

Day of.....Sep.....20 20

(Last chance for Reply)

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

“B”

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

No.

Appeal No..... of 20

Ragd

1509

19

Appellant/Petitioner

Muhammad Aman

Respondent

Secy Zakat ushr Kohat

Respondent No.....

13

Notice to:

- Fazal Habib s/o Zadd. Chowkidar. Office of
DO (SW), Shangla (now Junior Clerk BPS-11)

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this.....
Day of.....20

Sep 20

9/20

(Last chance for Reply)

Registrar
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

Perk
16-9-20
No.

Appeal No. 1509 of 20 19

Muhammad Aman Appellant/Petitioner

Versus

Secy Zakat Ushr Kohat Respondent

Respondent No. 5

Notice to: —

Secretary Establishment, KPK Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 21/9/2020 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 9th

Day of Sep 2020

*Last chance
(for Reply)*

M.R.
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

16-9-20

"B"

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

No.

Appeal No.....1509..... of 2019 .

.....Muhammad Aman.....Appellant/Petitioner

Versus

.....Sery Zakat ushr Kohat.....Respondent

Respondent No.....6.....

Notice to: - Accountant General (AG), KPK
 Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....24/9/2019.....at 8.00 A.M. If you wish to urge anything against the appelland/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 9th.....

Day of.....Sep.....20.....

(Last chance for Reply)

M. J. Jai
 Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No. 1509/2019.

Mr. Muhammad Aman.....Appellant.

Vs

Secretary to govt. of Khyber Pakhtunkhwa, Zakat & Usher
and others.....Respondents.

Reply on behalf of respondent No. 4 & 6.

Preliminary Objections:-

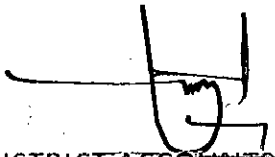
1. That the appellant has no cause of action.
2. That the appellant has no locus standi.
3. That the appeal is time barred.
4. That the appellant has joinder and mis-joinder of the necessary parties.

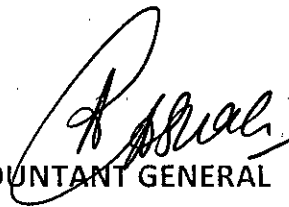
Respectfully Sheweth+

Para 1 to 6 : No Comments

It is submitted that being an administrative matter it relates to respondent No. 1,2,3,5 and 7, and they are in a better position to redress the grievances of the appellant. Besides, the appellant has raised no grievances against respondents No.4 &6 i.e. Accountant General Khyber Pakhtunkhwa office and District Accounts Office Kohat

Keeping in view the above mentioned facts, it is humbly prayed that the appellant may be directed to approach respondent No. 1,2,3,5 and 7, for the satisfaction of his grievances and the appeal in hand may be dismissed with cost.


DISTRICT ACCOUNTS OFFICER
District Accounts Officer
KOHAT
Kohat


ACCOUNTANT GENERAL
KHYBER PAKHTUNKHWA

۱۵۸۹/۱۹

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۱۵۸۹/۱۹

GOVERNMENT OF NWFP
DIRECTORATE OF SOCIAL WELFARE AND
WOMEN DEV: JAMRUD ROAD PESHAWAR.

14

16
Annex I

Dated Peshawar the 25/5/2004

ORDER

No.E-17/65/DSW/8626-34. On the recommendation of Departmental Selection Committee, Syed Mohammad Aman S/O Awal Khan, R/O Vill: Ghar Kala PO Shakardara Tehsil & District Kohat is hereby appointed as Naib Qasid in the ADP Scheme of the Department titled " Welfare Home Kohat" on the following terms and conditions:

- I- That this appointment shall be purely on contract basis, initially for the period upto 30th June, 2004, however is likely to be extendable on yearly basis.
- II- That the official shall be entitled to get pay Rs. 3017/- per month.
- III- That the contract can be terminated without assigning any reasons, at one month written notice for either side.
- IV- That this appointment shall automatically be terminated on abolition of the Project.
- V- That no TA/DA shall be admissible for joining the duty.
- VI- That this appointment is subject to medical fitness and verification of antecedents.
- VII- On expiry / completion of the contract / Project, services of the appointee in the Project shall stand terminated and shall not confer on the individual any right of absorption elsewhere or regularization of his services.
- VIII- Rest of the terms and conditions will be the same as mentioned in the agreement deed to be properly executed between the appointee and the Directorate of Social Welfare & Women Development NWFP Peshawar.

(Dr.Fakhr-ul-Islam)
Director
Social Welfare & Women
Development NWFP.

Endst: No. & date even.

- Copy forwarded to:
- 1- The District Accounts Officer, Kohat.
 - 2- The District Officer, Social Welfare Deptt: Kohat.
 - 3- The Planning Officer, Directorate of Social Welfare NWFP.
 - 4- The Section Officer-II, Social Welfare Deptt: w/r to his letter No.SOII (SW)/Vol-23/3062, dated 24.5.2004.
 - 5- PS to Minister, Social Welfare & WDD NWFP Peshawar.
 - 6- PS to Secretary, Social Welfare & WDD, NWFP Peshawar.
 - 7- The Incharge, Welfare Home Kohat.
 - 8- The official concerned.

A. Rajahat
M. I. R. D.
B. I. S. S. S.

8/5/04

[Signature]
Director
Social Welfare & Women
Development NWFP.

Attested
[Signature]

Annex II

OFFICE OF THE DISTRICT OFFICER SOCIAL WELFARE DEPTT: KOHAT.

NO.DO/SW/KT/ 1109-13

Dated Kohat the 20/09/2006

Office Order.

Consequent upon Regularization/Conversion of "Social Welfare Home Kohat" ADP Scheme to regular establishment by the Finance Department Govt of NWFP and Creation of posts w.e.f 1.7.2004, The Competent Authority has been pleased to convert contract appointment of Mr. Mohammad Aman, N/Qasid in to Regular appointment (order of appointment issued vide Directorate of Social Welfare & Women Development Department No. E-17/65/DSW/8626-34 dated 25.5.2004) from the date of taking over charge of the post on contract appointment and this order is being issued in pursuance of the NWFP Civil Servant Act 1973 (Amendment Act 2005) promulgated on 23.7.2005.

The Service of the Official will be considered regular but without Pension or Gratuity in terms of Section 19 of the Civil Servant Act 1973 as amendment Vide NWFP Civil Servant Act 2005.

However the official will be entitled to the C.F. Scheme as notified by the Government.

Note: - This order is being issued with the approval of District Coordination Officer, Kohat on 01/09/2004. ?

Sd/-
**District Officer,
Social Welfare, Kohat.**

Copy to:-

- 1- The District Coordination Officer, Kohat.
- 2- The Director Social Welfare & WDD, NWFP Peshawar.
- 3- The Executive District Officer (F&P), Kohat.
- 4- The District Accounts Officer, Kohat.
- 5- Official Concerned.

Sd/-
**District Officer,
Social Welfare, Kohat**

ADDA
26.9.06

870
26.9.06

Pu
15/11
13/381



GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF SOCIAL WELFARE,
SPECIAL EDUCATION AND WOMEN
EMPOWERMENT JAMRUD ROAD
PESHAWAR.

No. E-17/56/DSW/Vol-II/ 1192-1217
Dated Peshawar the 22/ 3 /2013

To

1. All the District Officers,
Social Welfare Department,
Khyber Pakhtunkhwa.
2. The Manager, ALW, Peshawar.


Subject:- PROMOTION OF MATRICULATE CLASS-IV
EMPLOYEES TO THE POST OF JUNIOR CLERK
BPS-07 UNDER 33% QUOTA.

I am directed to refer to the subject noted above and to state that this Directorate intends to take up a case for promotion of Matriculate Class-IV Employees of Social Welfare, Special Education & Women Empowerment, Khyber Pakhtunkhwa against the post of Junior Clerk BPS-07 under 33% quota.

In order to proceed further in the matter, the requisite information in respect of all the Matriculate Class-IV Employees serving in your respective Districts (on revenue side) may be furnished to this Directorate on the overleaf proforma.

The following documents/information may also be furnished.

1. Appointment order and arrival report. (duly attested)
2. Attested and legible latest budget copy of the post.
3. Attested and legible photo copies of academic certificates/degrees duly verified by the concerned Board.
4. Total sanctioned posts of Junior Clerk.
5. No. of vacant posts of Junior Clerk.


Assistant Director (Estt.)
Social Welfare, Spl: Edu: & WE
Khyber Pakhtunkhwa

REGISTERED

Government of Khyber Pakhtunkhwa
Directorate of Social Welfare, Special Education and
Women Empowerment Jamrud Road Peshawar.

No. E-17/56/DSW/Vol-II/1047-S1,
Dated Peshawar the 11/2/2014

To

- 1- All the District Officers
Social Welfare in Khyber Pakhtunkhwa.
- 2- Manager, Artificial Limbs Workshop Peshawar.
- 3- The Assistant Director (Admn),
Directorate of Social Welfare.

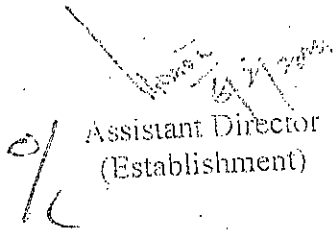
Subject:

TENTATIVE SENIORITY LIST OF MATRICULATE CLASS-IV
EMPLOYEES OF SOCIAL WELFARE, SPECIAL EDUCATION
AND WOMEN EMPOWERMENT DEPARTMENT, KHYBER
PAKHTUNKHWA.

I am directed to refer to the subject cited above and to enclose tentative seniority list of matriculate Class-IV employees with the request to circulate the same amongst the concerned officials and their signature on the office copy may be obtained as token of receipt. Objections / observations (if any) may be submitted to this Directorate within 15 days of the receipt of letter.


In case of non receipt of objection or proposal for verification within the prescribed time, it will be presumed that the same is correct and the final seniority list will be issued accordingly.

Encl: As above.


Assistant Director
(Establishment)

Copy forwarded to:

- 1- Section Officer-II, Social Welfare, SE & WE Khyber
Pakhtunkhwa.
- 2- PA to Director Social Welfare Khyber Pakhtunkhwa.


Assistant Director
(Establishment)



GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF SOCIAL WELFARE, S.P. EDU: &
WOMEN EMPOWERMENT, JANRUJ ROAD PESHAWAR

Dated Peshawar the 13/03/2015

NOTIFICATION

No. E-1756/DSW/Vol-III/ 10634-37. In pursuance of Section 8 (1) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule 17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfers) Rules 1989, final seniority list of Matriculate-Class-IV employees (BPS-01) of Social Welfare, Special Education & Women Empowerment Khyber Pakhtunkhwa, who possess the qualification of SSC, as it stood on 31.12.2014 is hereby notified for the information of all concerned.

FINAL SENIORITY LIST OF CLASS-IV EMPLOYEES OF SOCIAL WELFARE, SPECIAL EDUCATION AND WOMEN EMPOWERMENT,
GOVERNMENT OF KHYBER PAKHTUNKHWA WHO POSSESS THE QUALIFICATION OF S.S.C AS STOOD ON 31.12.2014

S/N	Name of official	Father's Name	Domicile	Designation	Date of birth	Year of passing SSC Examination	Qualification	Date of appointment	Remarks
1	Mr. Jehanzeb Khan	Mohibullah	Dir Lower	Junior Clerk	02.04.1986	1990 (Annual)	SSC	06.04.1988 (As Nab Qasid)	Promoted as J/Clerk on 01.03.2002
2	Mr. Muhammad Arif	Najaf Khan	Abbottabad	Junior Clerk	15.03.1988	1990 (Supply)	FA	01.06.1989 (Nab Qasid)	Promoted as J/Clerk on 24.02.2002
3	Mr. Abdul Wadood	Abdul Manan	Mardan	Junior Clerk	15.06.1986	1981 (Annual)	SSC	01.07.1989 (As Chowkidar)	Promoted as J/Clerk on 02.05.2002

20
Peshawar

Annex D
112

M/1/02

(E)

4	Mr. Farhad Janil	Abdul Satar	Peshawar	Junior Clerk	17.04.1959	1994 (Annual)	FA	11.10.1992 (As Chowkidar)	Promoted as J/Clerk on 06.01.2007
5	Syed Zakir Ali Shah	S. Attaullah Shah	Kohat	Junior Clerk	12.10.1975	1989 (Annual)	BA	04.05.1995 (As Chowkidar)	Promoted as J/Clerk on 30.05.2007
6	Mr. Fazle Rabbi	Abdul Ghani	Swabi	Junior Clerk	01.12.1975	1992 (Annual)	SSC	15.06.1993 (As Naib Qasid)	Promoted as J/Clerk on 01.06.2007
7	Mr. Arshad Saleem	Dost Muhammad	Charsadda	Junior Clerk	08.09.1973	1989 (Supply)	SSC	19.05.1994 (As Chowkidar)	Promoted as J/Clerk on 01.06.2007
8	Mr. Hazrat Badshah	Gul Badshah	Peshawar	Junior Clerk	08.01.1974	1991 (Annual)	SSC	11.10.1992 (As Naib Qasid)	Promoted as J/Clerk on 05.01.2010
9	Mr. Noor Said	Shah Said	Peshawar	Junior Clerk	03.03.1969	1996 (Supply)	SSC	15.08.1993 (As Naib)	Promoted as J/Clerk on 05.01.2010
10	Mr. Muhammad Ali	Kaki Jan	Mardan	Junior Clerk	29.12.1979	1996 (Annual)	FA	25.02.2008 (As Naib Qasid)	Promoted as J/Clerk on 20.08.2011
11	Syed Sajid Ali Shah	S. Ghani Shah	Peshawar	Junior Clerk	05.02.1982	1998 (Annual)	SSC	29.02.2008 (As Naib Qasid)	Promoted as J/Clerk on 20.08.2011
12	Mr. Abdul Hamid	Ajram Khan	Malakand Agency	Junior Clerk	14.03.1973	1991 (Annual)	SSC	14.03.2008 (As Chowkidar)	Promoted as J/Clerk on 20.08.2011
13	Shahryar Khan	Amrullah Khan	Dir Lower	Sweeper	12-01-1966	1990 (Supplementary)	SSC	07-04-1988	
14	Muhammad Rehman	Fazal Ghani	Swat	Assst. Cook	07-04-1972	1990 (Annual)	SSC	16-06-1992	
15	Hazrat Hussain	Abdul Manan	Buner	Chowkidar	01-01-1974	1993 (Supply)	FA + 6 month Certificate in IT	22-02-1992	
16	Muhammad Yasin	Waris Khan	Karak	Naib Qasid	04-02-1975	1994 (Annual)	SSC	(01-03-1996, As)	Result

12/10/03

(51)

17	Muhammad Iqbal	Farid Khan	Swat	Naib Qasid	19-04-1955	1996 (Supply)	SSC	Chowkidar, (10-03-1999, As Naib Qasid)	declared on 15.07.2008
18	Muhammad Iqbal	Ghulam Muhammad	Peshawar	Naib Qasid	01-04-1970	1997 (Supply)	SSC	As Naib Qasid)	
19	Akhtar Mahmood	Sarwar Khan	Haripur	Sweeper	10-01-1974	1991 (Annual)	SSC	01-07-2004	
20	Malayat Ali Shah	Syed Sultan Shah	Haripur	Mali	10-02-1977	1994 (Annual)	FA	01-07-2004	
21	Khanzaid Ali	Muhammad Rasool	Swat	Cook	01-04-1974	1998 (Annual)	SSC	11-01-2005	
22	Hazrat Ayub	Muhammad Younes	Swat	Naib Qasid	21-04-1974	1992 (Annual)	SSC	01-07-2007	
23	Amjad Iqbal	Fazal Abad	Swat	Naib Qasid	10-02-1976	1994 (Annual)	SSC	01-07-2007	
24	Zahid Khan	Muzafar Khan	Peshawar	Naib Qasid	13-04-1977	1996 (Annual)	SSC	01-07-2007	
25	Gohar Rehman	Aziz ur Rehman	Swat	Chowkidar	07-03-1985	2001 (Annual)	F.A	01-07-2007	
26	Qamar Ali Khan	Gul Nawaz Khan	Bannu	Naib Qasid	12-06-1966	1984 (Annual)	SSC	01-07-2008	
27	Fazli Qadir	Rehmat Gul	Mardan	Naib Qasid	16-06-1972	1987 (Annual)	BA + 6 months certificate in IT	03.03.2008	
28	Riaz Ullah	Abdul Qadar	Charsadda	Naib Qasid	20-03-1978	2008 (Annual)	SSC	18-06-2007	
29	Umar Ali Khan	Ghazi Marjan	Bannu	Chowkidar	20-07-1970	1987 (Annual)	F.A	01-07-2008	
30	Azmatullah	Adam Khan	Charsadda	Chowkidar	01-05-1977	1997 (Annual)	SSC	01-07-2008	
31	Mukarram Khan	Khan Muhammad	Peshawar	Naib Qasid	12-12-1982	2000 (Supply)	SSC	04-02-2009	
32	Adil Khan	Raees Khan	Peshawar	Sweeper	05-01-1990	2007 (Annual)	BA	26-08-2010	
33	Ajmal Sadig	Shah Zarin	Malkand	Chowkidar	15-03-1986	2008 (Annual)	SSC	30-11-2010	
34	Muhammad Sohail	Asmat Ullah	Malkand	Chowkidar	05-04-1992	2010 (Annual)	SSC	28-01-2011	
35	Jehan Sarwar	Ghulam Sarwar	Buner	Chowkidar	01-04-1977	1994 (Supply)	SSC	16-04-2011	
36	Faid Sultan	Sher Sultan	Swabi	Naib Qasid	09-01-1987	2003 (Annual)	SSC	27-04-2011	
37	Ghulam Saeed	Sultan Saeed	Swabi	Water Man	04-01-1989	2006 (Supply)	SSC	27-04-2011	
38	Bahar Zameen Shah	Islami Shah	Mardan	Chowkidar	05-02-1974	1991 (Annual)	MA Islamiyat	01-07-2011	
39	Noor Ullah	Abdur Rab	Charsadda	Chowkidar	12-03-1988	2003 (Supply)	FA	01-07-2011	

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12/10/23

6

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40	Muhammad Farooq Khan	Gul Akbar Khan	Bannu	Chowkidar	06-06-1979	1996 (Annual)	MAB Ed/Com puter Diploma	11-11-2011
41	Zahir Ullah	Jehangir Khan	Charsadda	Chowkidar	02-01-1981	1997 (Annual)	F.A	01-11-2012
42	Akhtar Munir	Hussain Ahmad	Charsadda	Naib Qasid	24-07-1988	2005 (Annual)	F.A	01-11-2012
43	Aamir Khan	Kabir Khan	Peshawar	Naib Qasid	04-05-1993	2009 (Supply)	FA	01-02-2012
44	Shabeen Niaz	Niaz Muhammad	Kohat	Aya	15.11.1966	2011 (Annual)	SSC	22.09.1994
45	Khurshid Ali	Bakht Jehan	Swat	Chowkidar	12-01-1978	2012 (Annual)	SSC	01-09-1996
46	Arniad Ali Khan	Mir Ahmad Khan	Peshawar	Chowkidar	28-03-1983	2013 (Annual)	SSC	14.10.2009
47	Yousaf Shah	Qalandar Shah	Swabi	Chowkidar	10-12-1997	2014 (Annual)	SSC	24-03-2012
48	Muhammad Hial Khan	Haji Ayyub Khan	Peshawar	Chowkidar	23-03-1994	2009 (Annual)	BA+Diploma in IT	03-06-2014

Copy forwarded to:

1. All the District Officer, Social Welfare in Khyber Pakhtunkhwa with the remarks to circulate the same amongst the official concerned working in your sub-offices.
2. The Manager, Artificial Limbs Workshop Peshawar.
3. The Assistant Director (Admin) Directorate of Social Welfare.
4. PA to Director, Social Welfare.

Assist. Director
(Establishment)

Assist. Director
(Establishment)



Annex VI
OK

TO BE SUBSTITUTED BEARING THE SAME NO. & DATE
GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF SOCIAL WELFARE, SPECIAL
EDUCATION AND WOMEN EMPOWERMENT
JAMRUD ROAD PESHAWAR.

Dated Peshawar the 30-07-2020

ORDER

No. E-17/56/Vol-III/DSW/862-73: On recommendations of the Departmental Promotion Committee in its meeting held on 30-07-2020, the following officials are hereby promoted to the post as recorded against their names with immediate effect.

1- JUNIOR CLERK BPS-11 TO BE PROMOTED AS SENIOR CLERK (BPS-14)

S. No	Name of Official	Place of present posting
1	Mr. Akbar Ali	DO (SW) Office Swabi
2	Mr. Taqweem Ul Haq	DO (SW) Office Dir Lower
3	Mr. Muhammad Iltaf	DO (SW) Office Mansehra
4	Mr. Hamayun Khan	MR & PHC Peshawar
5	Mr. Sajid Rashid	DO (SW) Office Kohat

2- AUXILIARY WORKER (BPS-7) TO THE POST OF JUNIOR CLERK (BPS-11)

S. No	Name of Official	Place of present posting
1	Mr. Shakirullah	DO (SW) Office Peshawar
2	Mr. Mujeebullah	DO (SW) Office DIKhan
3	Mst. Attiya Rasool	DO (SW) Office Peshawar
4	Mst. Asmat Begum	DO (SW) Office Mardan
5	Mr. Imranullah	DO (SW) Office Charsadda
6	Mst. Rehana Yasmin	DO (SW) Office DIKhan
7	Mr. Iftikhar Ahmad	DO (SW) Office Charsadda
8	Mr. Parvez Khan	DO (SW) Office Nowshera
9	Mr. Hidayatullah	DO (SW) Office Malakand
10	Mr. KifayatUllah	DO (SW) Office DIKhan
11	Mr. Akbar Nawaz	DO (SW) Office Peshawar
12	Mr. Mansoor Ahmad	DO (SW) Office Mardan
13	Mr. Asad Khan	DO (SW) Office Mardan
14	Mr. Faiz Muhammad	DO (SW) Office Battagram
15	Mr. Shahzadi Neelofar	DO (SW) Office Peshawar
16	Mst. Yasmin Begum	DO (SW) Office Mardan
17	Mr. Javed Iabal	DO (SW) Office Swat
18	Mr. Shah Zeb	DO (SW) Office Mardan

a- STORE KEEPERS (BPS-6-8) TO THE POST OF JUNIOR CLERK (BPS-11)

S. No	Name of Official	Place of present posting
1	Mr. Abdul Qadir	DO (SW) Office Buner
2	Mr. Shamsul Arifeen	School for Deaf Children Gulbahar Peshawar
3	Mr. Sadiq Akbar	GIB, Swat
4	Mr. Nasrullah,	GIB (Male) Peshawar
5	Mr. Nasrullah	GIB D.I.khan

b- CLASS-IV TO THE POST OF JUNIOR CLERK (BPS-11)

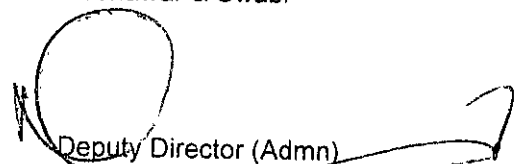
S. No	Name of Official	Place of present posting
1	Mr. Muhammad Sajid Workshop Attendant	GIB D.I.Khan
2	Mr. Hussain Ahmad Sweeper	RCDA D.I.Khan
3	Mr. Sajjad Khan Chowkidar	Women Crises Centre Peshawar

	Junior Clerk (BPS-11)	District Charsadda
16	Mst. Yasmin Begum, Junior Clerk (BPS-11)	Government School for Deaf Children Swabi
17	Mr. Javed Iqbal, Junior Clerk (BPS-11)	District office (SW) Swat
18	Mr. Shah Zeb, Junior Clerk (BPS-11)	Center for Mentally Retarded & Physically Handicapped Children Swabi
19	Mr. Abdul Qadir, Junior Clerk (BPS-11)	Welfare Home Buner
20	Mr. Shamsul Arifeen, Junior Clerk (BPS-11)	District Office (SW) Abbottabad
21	Mr. Sadiq Akbar, Junior Clerk (BPS-11)	Govt. Institute for the Blind Malakand
22	Mr. Nasrullah (GIB (M) Peshawar, Junior Clerk (BPS-11)	Govt. Institute for the Blind (Male) Peshawar
23	Mr. Nasrullah, Junior Clerk (BPS-11)	Rehabilitation Center for Drug Addicts, Swabi
24	Mr. Hussain Ahmad, Junior Clerk (BPS-11)	Bacha Khan Women Vocational Center Karak
25	Mr. Muhammad Sajid Junior Clerk (BPS-11)	District Office (SW) D.I.Khan
26	Mr. Sajjad Khan, Junior Clerk (BPS-11)	Government School for Deaf Children Malakand
27	Mr. Noroz Khan, Junior Clerk (BPS-11)	Social Services Medical Center Chakdara Dir (Lower)
28	Mr. Muhammad Aman, Junior Clerk (BPS-11)	District Office (SW) Kohat
29	Mr. Umar Ali Khan, Junior Clerk (BPS-11)	District Office (SW) Lakki Marwat
30	Mr. Sajid Ali, Junior Clerk (BPS-11)	Directorate of Social Welfare
31	Mr. Naeem Khokar, Junior Clerk (BPS-11)	Welfare Home Hangu
32	Mr. Muhammad Nabi, Junior Clerk (BPS-11)	Welfare Home, Malakand

Sd—
Director
(SW, SE & WE)

Copy to:

- 1- The Accountant General, Khyber Pakhtunkhwa
- 2- The District Account Officer, Dir Lower, Abbottabad, DIKhan, Charsadda, Malakand, Karak, Mardan, Swabi, Swat, Buner, Kohat, Hangu & Lakki Marwat.
- 3- PS to Minister for Social Welfare, Special Education & Women Empowerment, Department, Khyber Pakhtunkhwa
- 4- PS to Secretary, (Social Welfare, SE & WE).
- 5- The Director, Special Education Complex Hayatabad Peshawar
- 6- The District Officer (SW), Peshawar, Dir Lower, Abbottabad, DIKhan, Charsadda, Malakand, Mardan, Swabi, Swat, Buner, Chitral, Hangu & Lakki Marwat.
- 7- Deputy Director (MIS) Social Welfare Department, Khyber Pakhtunkhwa
- 8- The Assistant Directors (B&A) Directorate of SW
- 9- PA to Director (Social Welfare)
- 10- Assistant Director (Estab-1), Directorate of Social Welfare
- 11- Social Welfare Officer, Community Development Center Chakdara Dir Lower
- 12- The In-Charge, Government Institute for the Blind, Abbottabad, Peshawar (Male), Malakand
- 13- In-Charge Government school for Deaf Children, Kohat, Karak, Mardan (Female) & Swabi
- 14- Rehabilitation Officer / In-Charge, Drug Addict Center, Charsadda, Malakand, DIKhan & Swabi
- 15- Manager / In-Charge Center for Mentally Retarded & PHC Peshawar & Swabi
- 16- All the official concerned
- 17- Personal file


Deputy Director (Admn)
Social Welfare, SE & WE
Khyber Pakhtunkhwa
30/7/2

BEFORE THE SERVICE TRIBUNAL K.P.K,
PESHAWAR

Appeal No.1509/2019

Mr. Muhammad Aman



..... Appellant

VERSUS

Secretary of Govt. of Khyber Pakhtunkhwa Zakat, & others

..... Respondents

REJOINDER ON BEHALF OF APPELLANT ON REPLY
OF RESPONDENTS No. 4-6

Respectfully Sheweth:

1. All the preliminary objection are baseless and without any legal footing.
2. That the appellant has cause of action, locus standi and in the appeal in hand is within time and competent, hence liable to be consider.

ON FACT:

1-6 Paras No. 1 to 6 are not contested by the respondents No. 4 and 6 but the remaining reply of respondents No. 4 and 6 is incorrect because respondents No. 4 and 6 are equally responsible along-with remaining respondents to deprived

the appellant from his vested fundamental rights and violation the Law and Rule Regulation on the subject.

PRAYER:

It is, therefore, most humbly prayed that on acceptance of this Rejoinder, the Appeal may please be accepted and the appellant may be consider in the senior part of the seniority list as 13.03.2015 comp are to private respondents and his name also consider from the order dated 26.06.2015 and also entitled for back benefits along-with any other relief which is not specifically asked for may also be given to appellant and also this Rejoinder may kindly be consider part and parcel of the appeal.

Appellant

Through

Dated: 10.6.2021

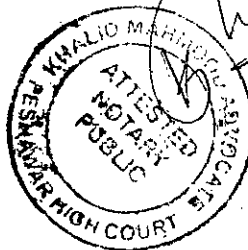
ISRAR UD DIN

Advocate, High Court,

Peshawar

Affidavit:

I, Muhammad Aman S/o Amar Khan R/o P.O Shakar Dara, Tehsil Lachi, District Kohat, solemnly affirm and declare on oath that the contents of above Rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



DEPONENT

38

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service appeal No. 1509/2019

**MR. MUHAMMAD AMAN, NAIB QASID, AT SOCIAL WELFARE
DEPARTMENT
KOHAT.....APPELLANT**

VERSUS

1. Secretary Zakat, Ushr, Social Welfare, Special Education & Women Empowerment Department, Peshawar.
2. Director, Social Welfare, Special Education and Women Empowerment Department Khyber Pakhtunkhwa Peshawar
3. District Officer (DO), Social Welfare, Special Education & Women Empowerment Department, Khyber Pakhtunkhwa, Kohat.
4. District Account Officer.
5. Secretary Establishment, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
6. Accountant General (AG), Khyber Pakhtunkhwa, Peshawar.
7. Akhtar Mehmood S/o Sarwar Khan, Sweepér, Office of DO (SW Kohistan) now junior Clerk (BPS-11).
8. Zahid Khan S/o Muzafar Khan, Naib Qasid, Office of the DO (now Junior Clerk BPS-11), Abbottabad.
9. Fazal Qadir S/o Rehmat Gul, Naib Qasid, Office of DO (now Junior Clerk BPS-11) Dir Upper.
10. Muhammad Ali S/o Ghani, Naib Qasid, Office of DO (SW), Peshawar (now Junior Clerk BPS-11).
11. Sajjad Ali Shah S/o Ghani, Naib Qasid, Office of DO (SW), Peshawar (now Junior Clerk BPS-11).
12. Abdul Hameed S/o Ajram Khan, Chowkidar, Office of DO (SW), Shangla (now Clerk BPS-11)
13. Fazal Habib S/o Zadad, Chokidar, Office of DO (SW) , Shangla (now Junior Clerk BPS-11)**RESPONDENTS**

PARA-WISE COMMENTS ON BEHALF OF THE RESPONDENTS NO. 1,2,3 & 5.

Respectfully Sheweth,

PRELIMINARY OBJECTIONS:

1. The appellant has got no cause of action
2. The appeal is not maintainable in its present form.
3. The appeal is based on malafide intentions.
4. The appellant has no locus standi.
5. The appeal in hand has badly time barred.
6. The appellant has not come to Honorable Tribunal with clean hands.

7. The appellant has concealed the material facts from this Honorable Tribunal, hence liable to be dismissed.
8. The appeal is liable to be dismissed for non joinder / misjoinder of necessary parties.
9. The appeal is against the prevailing law & rules.

FACTS

1. Correct to the extent that the appellant was initially appointed as Naib Qasid in ADP scheme of the department titled "Welfare Home Kohat" vide order No. E-17/65/DSW/8626-34 dated 25-05-2004, (Annex-I). The competent authority converted contract appointment of the petitioner into regular appointment vides order No. DO/SW/KT/1109-13 dated 20-09-2006 (Annex-II).
2. Correct to the extent that at the time of initial appointment, the qualification of the appellant was matriculation. The appellant improved his qualification during the service. However, the appellant got no NOC from the concerned department for improving his qualification as per available record.
3. Incorrect, hence denied. Initially the appellant was appointed by Directorate of Social Welfare under ADP scheme for the financial year 2004/2005 in Welfare Home Kohat. Furthermore, District Coordination Officer (DCO) being the appointing authority from BPS-2 to BPS-15, regularized the services of the appellant. As the petitioner was the appointee of the District Government, therefore the Directorate of Social Welfare has no such record of their services. Moreover, the Directorate of Social Welfare requested all the District Officers Social Welfare to provide the record of all the class IV employees for the promotion under 33 % quota by the Directorate vide letter No. E-17/56/DSW/Vol-II/1192-1217 dated 22-03-2013. Subsequently, issued reminders dated 12/09/2013 & 11/02/2014 (Annex-III). Consequently, on the basis of the available data provided by maximum number of District Social Welfare Officers, tentative seniority list of Class IV employees was prepared and circulated vide letter No. E-17/56/DSW/Vol-II/1047-51 dated 11/02/2014 (Annex-IV). After incorporating observations made on tentative seniority list, the final Seniority list notified vides Notification No. E17/56/DSW/Vol-II/10634-37 dated 13-03-2015 (Annex-V). Resultantly, meeting of Departmental Promotion Committee was convened and promotions were made on the basis of merit furnished by field offices.
4. Correct. The respondents No.7 to 13 were promoted as per available record provided by the District Officers.
5. Incorrect, hence denied. That the Department has already accommodated/promoted this employee from the post of naib Qasid to Junior clerk vide order no E-17/56/Vol-III/DSW/73 dated 30-07-2020 (Annex-VI). Therefore, the present appeal is infructuous and not maintainable.
6. Pertains to the record. However the instand appeal is badly time barred.

GROUND

- A. Incorrect, hence denied. The factual position has been explained in the preceding paras. However if the appellant was aggrieved for the seniority list he should have challenged the same.
- B. Incorrect, hence denied. That the respondents issued the seniority list as per available record provided by the District Officers with in good faith.
- C. That factual position has been explained in the preceding paras.
- D. Incorrect, hence denied. The factual position has been explained in the para no.5 of the facts.
- E. The factual position has been explained in the above paras of the facts.
- F. Incorrect, hence denied. No rights of the appellant guaranteed under the law have been violated. The respondents' orders/ actions are under the Laws/rules and there has been no violation of the Law on part of the respondents. Moreover, the promotions were made on the basis of consolidated seniority list of the province.
- G. That the Respondents seek the prior permission of this Honorable Tribunal to rely on additional ground at the hearing of the appeal.

It is therefore humble prayed that the in view of the above reply / explanation, the instant appeal may graciously be dismissed.

SECRETARY to

Govt. of Khyber Pakhtunkhwa for
Ushr, Zakat
Social Welfare, Special Education &
Women Empowerment
(Respondent No. 1)

DIRECTOR

Social Welfare, Special Education &
Women Empowerment, Peshawar
(Respondent No. 2)

DISTRICT OFFICER (KOHAT)

Govt. of Khyber Pakhtunkhwa for
Social Welfare, Special Education &
Women Empowerment
(Respondent No. 3)

SECRETARY to

Government of Khyber Pakhtunkhwa
for
ESTABLISHMENT DEPARTMENT
(Respondent No. 5)

41

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service appeal No. 1509/2019

**MR. MUHAMMAD AMAN, NAIB QASID, AT SOCIAL WELFARE
DEPARTMENT
KOHAT.....APPELLANT**

VERSUS

1. Secretary Zakat, Ushr, Social Welfare, Special Education & Women Empowerment Department, Peshawar.
2. Director, Social Welfare, Special Education and Women Empowerment Department Khyber Pakhtunkhwa Peshawar
3. District Officer (DO), Social Welfare, Special Education & Women Empowerment Department, Khyber Pakhtunkhwa, Kohat.
4. District Account Officer.
5. Secretary Establishment, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
6. Accountant General (AG), Khyber Pakhtunkhwa, Peshawar.
7. Akhtar Mehmood S/o Sarwar khan, Sweeper, Office of DO (SW Kohistan) now junior Clerk (BPS-11).
8. Zahid khan S/o Muzafar Khan, Naib Qasid, Office of the DO (now Junior Clerk BPS-11), Abbottabad.
9. Fazal Qadir S/o Rehmat Gul, Naib Qasid, Office of DO (now Junior Clerk BPS-11) Dir Upper.
10. Muhammad Ali S/o Ghani, Naib Qasid, Office of DO (SW), Peshawar (now Junior Clerk BPS-11).
11. Sajjad Ali Shah S/o Ghani, Naib Qasid, Office of DO (SW), Peshawar (now Junior Clerk BPS-11).
12. Abdul Hameed S/o Ajram Khan, Chowkidar, Office of DO (SW), Shangla (now Clerk BPS-11)
13. Fazal Habib S/o Zadad, Chokidar, Office of DO (SW) , Shangla (now Junior Clerk BPS-11)**RESPONDENTS**

**REPLY ON BEHALF OF THE RESPONDENTS NO. 1,2,3 & 5 REGARDING THE
CONDONATION OF THE DELAY APPLICATION.**

Respectfully Sheweth,

1. No comments.
2. The applicant has no prima facie case and no balance of convenience lies in the favour of the applicant.
3. Incorrect, hence denied. The ignorance of law has no excuse and the applicant has not been mentioned any verdict of the honorable superior court therefore, the appeal of the applicant is not maintainable and badly time barred.
4. The respondents respect the judgment of the superior court however, every case has its own merit.

- 5. The appellant intentionally and deliberately did not file the appeal within time.
- 6. No needs to comment.
- 7. The factual position has been explained in the above paras.
- 8. The factual position has been explained in the above paras.

It is, therefore humbly prayed that on the acceptance of the application of the condonation of delay may kindly be dismissed with cost.



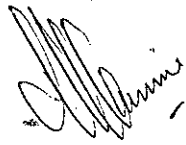
SECRETARY to

Govt. of Khyber Pakhtunkhwa for
Ushr, Zakat
Social Welfare, Special Education &
Women Empowerment
(Respondent No. 1)



DIRECTOR

Social Welfare, Special Education &
Women Empowerment, Peshawar
(Respondent No. 2)



DISTRICT OFFICER (KOHAT)

Govt. of Khyber Pakhtunkhwa for
Social Welfare, Special Education &
Women Empowerment
(Respondent No. 3)



SECRETARY to

Government of Khyber Pakhtunkhwa
for
ESTABLISHMENT DEPARTMENT
(Respondent No. 5)

GOVERNMENT OF NWFP
DIRECTORATE OF SOCIAL WELFARE AND
WOMEN DEV: JAMRUD ROAD PESHAWAR.

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Annex T

Dated Peshawar the 25/5/2004

ORDER

No.E-17/65/DSW/8626-34. On the recommendation of Departmental Selection Committee, Syed Mohammad Aman S/O Awal Khan, R/O Vill: Ghar Kala PO Shakardara Tehsil & District Kohat is hereby appointed as Naib Qasid in the ADP Scheme of the Department titled " Welfare Home Kohat" on the following terms and conditions:

- I- That this appointment shall be purely on contract basis, initially for the period upto 30th June, 2004, however is likely to be extendable on yearly basis.
- II- That the official shall be entitled to get pay Rs. 3017/- per month.
- III- That the contract can be terminated without assigning any reasons, at one month written notice for either side.
- IV- That this appointment shall automatically be terminated on abolition of the Project.
- V- That no TA/DA shall be admissible for joining the duty.
- VI- That this appointment is subject to medical fitness and verification of antecedents.
- VII- On expiry / completion of the contract / Project, services of the appointee in the Project shall stand terminated and shall not confer on the individual any right of absorption elsewhere or regularization of his services.
- VIII- Rest of the terms and conditions will be the same as mentioned in the agreement deed to be properly executed between the appointee and the Directorate of Social Welfare & Women Development NWFP Peshawar.

(Dr.Fakhr-ul-Islam)
Director
Social Welfare & Women
Development NWFP.

Endst: No. & date even.

- Copy forwarded to:
- 1- The District Accounts Officer, Kohat.
 - 2- The District Officer, Social Welfare Deptt: Kohat.
 - 3- The Planning Officer, Directorate of Social Welfare NWFP.
 - 4- The Section Officer-II, Social Welfare Deptt: w/r to his letter No.SOII (SW)/Vol-23/3062, dated 24.5.2004.
 - 5- PS to Minister, Social Welfare & WDD NWFP Peshawar.
 - 6- PS to Secretary, Social Welfare & WDD, NWFP Peshawar.
 - 7- The Incharge, Welfare Home Kohat.
 - 8- The official concerned.

Dr. F. I. Khan
Naib Qasid
B. K. S. S. S.
8/8/04

[Signature]
Director
Social Welfare & Women
Development NWFP.

Attested
[Signature]

✓ Annex A

OFFICE OF THE DISTRICT OFFICER SOCIAL WELFARE DEPTT: KOHAT.

NO.DO/SW/KT/ 1109-13

Dated Kohat the 20/09/2006

Office Order.

Consequent upon Regularization/Conversion of "Social Welfare Home Kohat" ADP Scheme to regular establishment by the Finance Department Govt of NWFP and Creation of posts w.e.f 1.7.2004, The Competent Authority has been pleased to convert contract appointment of Mr. Mohammad Aman, N/Qasid in to Regular appointment (order of appointment issued vide Directorate of Social Welfare & Women Development Department No. E-17/65/DSW/8626-34 dated 25.5.2004) from the date of taking over charge of the post on contract appointment and this order is being issued in pursuance of the NWFP Civil Servant Act 1973 (Amendment Act 2005) promulgated on 23.7.2005.

The Service of the Official will be considered regular but without Pension or Gratuity in terms of Section 19 of the Civil Servant Act 1973 as amendment Vide NWFP Civil Servant Act 2005.

However the official will be entitled to the C.F. Scheme as notified by the Government.

Note: - This order is being issued with the approval of District Coordination Officer, Kohat on 01/09/2004. ?

Sd/-
District Officer,
Social Welfare, Kohat.

Copy to:-

- 1- The District Coordination Officer, Kohat.
- 2- The Director Social Welfare & WDD, NWFP Peshawar.
- 3- The Executive District Officer (F&P), Kohat.
- 4- The District Accounts Officer, Kohat.
- 5- Official Concerned.

Sd/-
District Officer,
Social Welfare, Kohat

ADA
26.9.06

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26.9.06

Pe
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13/09

13/09



GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF SOCIAL WELFARE,
SPECIAL EDUCATION AND WOMEN
EMPOWERMENT JAMRUD ROAD
PESHAWAR.

No. E-17/56/DSW/Vol-II/ 1192-1217
Dated Peshawar the 22/3/2013

To


1. All the District Officers,
Social Welfare Department,
Khyber Pakhtunkhwa.
 2. The Manager, ALW, Peshawar.
- Subject:- PROMOTION OF MATRICULATE CLASS-IV
EMPLOYEES TO THE POST OF JUNIOR CLERK
BPS-07 UNDER 33% QUOTA.

I am directed to refer to the subject noted above and to state that this Directorate intends to take up a case for promotion of Matriculate Class-IV Employees of Social Welfare, Special Education & Women Empowerment, Khyber Pakhtunkhwa against the post of Junior Clerk BPS-07 under 33% quota.

In order to proceed further in the matter, the requisite information in respect of all the Matriculate Class-IV Employees serving in your respective Districts (on revenue side) may be furnished to this Directorate on the overleaf proforma.

The following documents/information may also be furnished.

1. Appointment order and arrival report. (duly attested)
2. Attested and legible latest budget copy of the post.
3. Attested and legible photo copies of academic certificates/degrees duly verified by the concerned Board.
4. Total sanctioned posts of Junior Clerk.
5. No. of vacant posts of Junior Clerk.


Assistant Director (Estt.)
Social Welfare, Spl: Edu: & WE
Khyber Pakhtunkhwa

Directorate of Social Welfare, Special Education and
Women Empowerment, Jamrud Road, Peshawar.

No. E-KC-I/E-17/56/DSW/ 2766-79
Dated Pesh the 12/9/2013

CP
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The District Officer,
Social Welfare, Abbottabad, Malakand, Battagram,
DIKhan, Dir Lower, Haripur, Kohat, Lakki Marwat,
Mansehra, Mardan, Nowshera, Peshawar,
Shangla & Tank.

Subject:

PROMOTION OF MATRICULATE CLASS-IV EMPLOYEES TO THE POST OF JUNIOR
CLERK BPS-07 UNDER 33% QUOTA.

P-224/c
219/c

Reference this office letter No. E-17/56/DSW/Vol-II/1192-1217, dated

22.03.2013 action on the subject is still awaited.

Please expedite.

Wahid
K/9
Assistant Director
(Establishment)

e/e

REGISTERED

Government of Khyber Pakhtunkhwa
Directorate of Social Welfare, Special Education and
Women Empowerment Jamrud Road Peshawar.

No. E-17/56/DSW/Vol-II/1067-S1
Dated Peshawar the 11/2/2014

To

- 1- All the District Officers
Social Welfare in Khyber Pakhtunkhwa.
- 2- Manager, Artificial Limbs Workshop Peshawar.
- 3- The Assistant Director (Admn),
Directorate of Social Welfare.

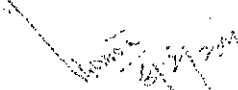
Subject:

TENTATIVE SENIORITY LIST OF MATRICULATE CLASS-IV
EMPLOYEES OF SOCIAL WELFARE, SPECIAL EDUCATION
AND WOMEN EMPOWERMENT DEPARTMENT, KHYBER
PAKHTUNKHWA.

I am directed to refer to the subject cited above and to enclose tentative seniority list of matriculate Class-IV employees with the request to circulate the same amongst the concerned officials and their signature on the office copy may be obtained as token of receipt. Objections & observations (if any) may be submitted to this Directorate within 15 days of the receipt of letter.


In case of non receipt of objection or proposal for verification within the prescribed time, it will be presumed that the same is correct and the final seniority list will be issued accordingly.

Encl: As above.


Assistant Director
(Establishment)

Copy forwarded to:

- 1- Section Officer-II, Social Welfare, SE & WE Khyber
Pakhtunkhwa.
- 2- PA to Director Social Welfare Khyber Pakhtunkhwa.


Assistant Director
(Establishment)



**GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF SOCIAL WELFARE, SPL. EDU. &
WOMEN EMPOWERMENT, JANRUD ROAD PESHAWAR**

Dated Peshawar the 23/23/2015.

NOTIFICATION

No. E-1756/DSP/W/11/ 10634-37. In pursuance of Section 8 (1) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule 17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfers) Rules 1989, final seniority list of Matriculate Class-IV employees (BPS-01) of Social Welfare, Special Education & Women Empowerment Khyber Pakhtunkhwa, who possess the qualification of SSC, as it stood on 31.12.2014 is hereby notified for the information of all concerned.

**FINAL SENIORITY LIST OF CLASS-IV EMPLOYEES OF SOCIAL WELFARE, SPECIAL EDUCATION AND WOMEN EMPOWERMENT,
GOVERNMENT OF KHYBER PAKHTUNKHWA WHO POSSESS THE QUALIFICATION OF S.S.C AS STOOD ON 31.12.2014**

S.N	Name of official	Father's Name	Domicile	Designation	Date of birth	Year of passing SSC Examination	Qualification	Date of appointment	Remarks
1	Mr. Jehanzeb Khan	Mohibullah	Dir Lower	Junior Clerk	02.04.1966	1990 (Annual)	SSC	06.04.1988 (As Naib Qasid)	Promoted as J/Clerk on 01.03.2002
2	Mr. Muhammad Arif	Najaf Khan	Abbottabad	Junior Clerk	15.03.1968	1990 (Supply)	FA	01.06.1989 (As Naib Qasid)	Promoted as J/Clerk on 24.02.2002
3	Mr. Abdul Wadood	Abdul Manan	Mardan	Junior Clerk	15.06.1966	1981 (Annual)	SSC	01.07.1989 (As Chowkidar)	Promoted as J/Clerk on 02.05.2002

100 (SW) Office Mardan

a- STORE KEEPERS (BPS-6-8) TO THE POST OF JIININD

Amir
1
2

40	Muhammad Farooq Khan	Gul Akbar Khan	Bannu	Chowkidar	06-06-1979	1996 (Annual)	M.A/B.Ed/Computer Diploma	11-11-2011	
41	Zahir Ullah	Jalanyir Khan	Charsadda	Chowkidar	02-01-1981	1997 (Annual)	F.A	01-11-2012	
42	Akhter Munir	Hussain Ahmad	Charsadda	Naib Qasid	24-07-1988	2005 (Annual)	F.A	01-11-2012	
43	Aamir Khan	Kabir Khan	Peshawar	Naib Qasid	04-05-1993	2009 (Supply)	FA	01-02-2012	
44	Shabeen Niaz	Niaz Muhammad	Kohat	Aya	15-11-1966	2011 (Annual)	SSC	22-09-1994	
45	Khurshid Ali	Bakht Jehan	Swat	Chowkidar	12-01-1978	2012 (Annual)	SSC	01-09-1996	
46	Arjad Ali Khan	Mir Ahmad Khan	Peshawar	Chowkidar	26-03-1983	2013 (Annual)	SSC	14-10-2009	
47	Yousaf Shah	Qalandar Shah	Swabi	Chowkidar	10-12-1997	2014 (Annual)	SSC	24-03-2012	
48	Muhammad Hilal Khan	Haji Ayub Khan	Peshawar	Chowkidar	23-03-1994	2009 (Annual)	BA+Diploma in IT	03-06-2014	

Copy forwarded to:

1. All the District Officer, Social Welfare in Khyber Pakhtunkhwa with the remarks to circulate the same amongst the official concerned working in your sub-offices.
2. The Manager, Artificial Limbs Workshop Peshawar.
3. The Assistant Director (Admin) Directorate of Social Welfare.
4. PA to Director, Social Welfare.

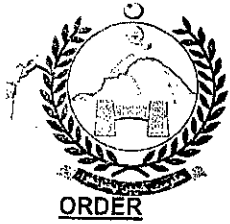
[Signature]
Asstt. Director
(Establishment)

[Signature]
Asstt. Director
(Establishment)

DO (SW) Office Mardan

a- STORE KEEPERS (BPS-6-8) TO THE DISTRICT OFFICE

Amma VI
OK



TO BE SUBSTITUTED BEARING THE SAME NO. & DATE
GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF SOCIAL WELFARE, SPECIAL
EDUCATION AND WOMEN EMPOWERMENT
JAMRUD ROAD PESHAWAR.

Dated Peshawar the 30-07-2020

ORDER

No. E-17/56/Voi-III/DSW/862-73: On recommendations of the Departmental Promotion Committee in its meeting held on 30-07-2020, the following officials are hereby promoted to the post as recorded against their names with immediate effect.

1- JUNIOR CLERK BPS-11 TO BE PROMOTED AS SENIOR CLERK (BPS-14)

S. No	Name of Official	Place of present posting
1	Mr. Akbar Ali	DO (SW) Office Swabi
2	Mr. Taqweem Ul Haq	DO (SW) Office Dir Lower
3	Mr. Muhammad Iltaf	DO (SW) Office Mansehra
4	Mr. Hamayun Khan	MR & PHC Peshawar
5	Mr. Sajid Rashid	DO (SW) Office Kohat

2- AUXILIARY WORKER (BPS-7) TO THE POST OF JUNIOR CLERK (BPS-11)

S. No	Name of Official	Place of present posting
1	Mr. Shakirullah	DO (SW) Office Peshawar
2	Mr. Mujeebullah	DO (SW) Office DIKhan
3	Mst. Attiya Rasool	DO (SW) Office Peshawar
4	Mst. Asmat Begum	DO (SW) Office Mardan
5	Mr. Imranullah	DO (SW) Office Charsadda
6	Mst. Rehane Yasmin	DO (SW) Office DIKhan
7	Mr. Iftikhar Ahmad	DO (SW) Office Charsadda
8	Mr. Parvez Khan	DO (SW) Office Nowshera
9	Mr. Hidayatullah	DO (SW) Office Malakand
10	Mr. Kifayatullah	DO (SW) Office DIKhan
11	Mr. Akbar Nawaz	DO (SW) Office Peshawar
12	Mr. Mansoor Ahmad	DO (SW) Office Mardan
13	Mr. Asad Khan	DO (SW) Office Mardan
14	Mr. Faiz Muhammad	DO (SW) Office Battagram
15	Mr. Shahzadi Neelofar	DO (SW) Office Peshawar
16	Mst. Yasmin Begum	DO (SW) Office Mardan
17	Mr. Javed Iqbal	DO (SW) Office Swat
18	Mr. Shah Zeb	DO (SW) Office Mardan

a- STORE KEEPERS (BPS-6-8) TO THE POST OF JUNIOR CLERK (BPS-11)

S. No	Name of Official	Place of present posting
1	Mr. Abdul Qadir	DO (SW) Office Buner
2	Mr. Shamsul Arifeen	School for Deaf Children Gulbahar Peshawar
3	Mr. Sadiq Akbar	GIB, Swat
4	Mr. Nasrullah	GIB (Male) Peshawar
5	Mr. Nasrullah	GIB D.I.khan

b- CLASS-IV TO THE POST OF JUNIOR CLERK (BPS-11)

S. No	Name of Official	Place of present posting
1	Mr. Muhammad Sajid Workshop Attendant	GIB D.I.Khan
2	Mr. Hussain Ahmad Sweeper	RCDA D.I.Khan
3	Mr. Sajjad Khan Chowkidar	Women Crises Centre Peshawar

4	Mr. Noroz Khan Chowkidar	Darul Kafala Peshawar
5	Mr. Muhammad Aman Naib Qasid	Welfare Home Kohat
6	Mr. Umar Ali Khan Chowkidar	Welfare Home Bannu
7	Mr. Sajid Ali Naib Qasid	Directorate of Social Welfare
8	Mr. Naeem Khokar Sweeper	GIB (M) Peshawar.
9	Mr. Muhammad Nabi, Chowkidar	Government School for Deaf Children Dargai Malakand

2- The officials on promotion will remain on probation for a period of one year extendable for a further period of one year in terms of Rules 6 (2) of the Khyber Pakhtunkhwa Civil Servant Act 1973 read with Rule 15 (1) of the Khyber Pakhtunkhwa Government Servant (Appointment, Promotion & Transfer) Rules 1989.

3- Consequent upon of their promotions, the officials are hereby posted upon the post as mentioned against their names below.

Posting of Senior Clerks (BPS-14)

S. No	Name & Designation of Official	Place of Posting
1	Mr. Akbar Ali, Senior Clerk (BPS-14)	Directorate of Social Welfare
2	Mr. Taqweem Ul Haq Senior Clerk (BPS-14)	Community Development Center Chakdara Dir Lower
3	Mr. Muhammad Iltaf Senior Clerk (BPS-14)	Government Institute for the Blind Abbottabad
4	Mr. Hamayun Khan Senior Clerk (BPS-14)	Special Education Complex Hayatabad Peshawar
5	Mr. Sajid Raşnid Senior Clerk (BPS-14)	Government School for Deaf Children Kohat

Posting of Junior Clerks (BPS-11)

S. No	Name & Designation of Official	Place of Posting
1	Mr. Shakirullah, Junior Clerk (BPS-11)	Darul Kafala Peshawar
2	Mr. Mujeebullah, Junior Clerk (BPS-11)	Government School for Deaf Children Karak
3	Mst. Attiya Rasool, Junior Clerk (BPS-11)	District Office SW Peshawar
4	Mst. Asmat Begum, Junior Clerk (BPS-11)	Govt. School for Deaf Children (Female) Mardan
5	Mr. Imranullah, Junior Clerk (BPS-11)	District Office (SW) Charsadda
6	Mst. Rehana Yasmin, Junior Clerk (BPS-11)	District Office (SW) D.I.Khan
7	Mr. Iftikhar Ahmad, Junior Clerk (BPS-11)	Rehabilitation Center for Drug Addicts Charsadda
8	Mr. Parvez Khan, Junior Clerk (BPS-11)	District Office (SW) Swabi
9	Mr. Hidayatullah, Junior Clerk (BPS-11)	Rehabilitation Center for Drug Addicts Malakand
10	Mr. Kifayat Ullah, Junior Clerk (BPS-11)	Rehabilitation Center for Drug Addicts D.I.Khan
11	Mr. Akbar Nawaz, Junior Clerk (BPS-11)	Center for Mentally Retarded & Physically Handicapped Children Peshawar
12	Mr. Mansoor Ahmad, Junior Clerk (BPS-11)	Bacha Khan Vocational Center Pabbi District Nowshera
13	Mr. Asad Khan, Junior Clerk (BPS-11)	District Office (SW) Swabi
14	Mr. Faiz Muhammad, Junior Clerk (BPS-11)	District Office (SW) Tor Ghar
15	Mst. Shahzadi Neelofar,	Bacha Khan Vocational Center Shabqadar

	Junior Clerk (BPS-11)	District Charsadda
16	Mst. Yasmin Begum, Junior Clerk (BPS-11)	Government School for Deaf Children Swabi
17	Mr. Javed Iqbal, Junior Clerk (BPS-11)	District office (SW) Swat
18	Mr. Shah Zeb, Junior Clerk (BPS-11)	Center for Mentally Retarded & Physically Handicapped Children Swabi
19	Mr. Abdul Qadir, Junior Clerk (BPS-11)	Welfare Home Buner
20	Mr. Shamsul Arifeen, Junior Clerk (BPS-11)	District Office (SW) Abbottabad
21	Mr. Sadiq Akbar, Junior Clerk (BPS-11)	Govt. Institute for the Blind Malakand
22	Mr. Nasrullah (GIB (M) Peshawar, Junior Clerk (BPS-11)	Govt. Institute for the Blind (Male) Peshawar
23	Mr. Nasrullah, Junior Clerk (BPS-11)	Rehabilitation Center for Drug Addicts, Swabi
24	Mr. Hussain Ahmad, Junior Clerk (BPS-11)	Bacha Khan Women Vocational Center Karak
25	Mr. Muhammad Sajid Junior Clerk (BPS-11)	District Office (SW) D.I.Khan
26	Mr. Sajjad Khan, Junior Clerk (BPS-11)	Government School for Deaf Children Malakand
27	Mr. Noroz Khan, Junior Clerk (BPS-11)	Social Services Medical Center Chakdara Dir (Lower)
28	Mr. Muhammad Aman, Junior Clerk (BPS-11)	District Office (SW) Kohat
29	Mr. Umar Ali Khan, Junior Clerk (BPS-11)	District Office (SW) Lakki Marwat
30	Mr. Sajid Ali, Junior Clerk (BPS-11)	Directorate of Social Welfare
31	Mr. Naeem Khokar, Junior Clerk (BPS-11)	Welfare Home Hangu
32	Mr. Muhammad Nabi, Junior Clerk (BPS-11)	Welfare Home, Malakand

Sd—
Director
(SW, SE & WE)

Copy to:

- 1- The Accountant General, Khyber Pakhtunkhwa
- 2- The District Account Officer, Dir Lower, Abbottabad, DIKhan, Charsadda, Malakand, Karak, Mardan, Swabi, Swat, Buner, Kohat, Hangu & Lakki Marwat.
- 3- PS to Minister for Social Welfare, Special Education & Women Empowerment, Department, Khyber Pakhtunkhwa
- 4- PS to Secretary, (Social Welfare, SE & WE).
- 5- The Director, Special Education Complex Hayatabad Peshawar
- 6- The District Officer (SW), Peshawar, Dir Lower, Abbottabad, DIKhan, Charsadda, Malakand, Mardan, Swabi, Swat, Buner, Chitral, Hangu & Lakki Marwat.
- 7- Deputy Director (MIS) Social Welfare Department, Khyber Pakhtunkhwa
- 8- The Assistant Directors (B&A) Directorate of SW
- 9- PA to Director (Social Welfare)
- 10- Assistant Director (Estab-1), Directorate of Social Welfare
- 11- Social Welfare Officer, Community Development Center Chakdara Dir Lower
- 12- The In-Charge, Government Institute for the Blind, Abbottabad, Peshawar (Male), Malakand
- 13- In-Charge Government school for Deaf Children, Kohat, Karak, Mardan (Female) & Swabi
- 14- Rehabilitation Officer / In-Charge, Drug Addict Center, Charsadda, Malakand, DIKhan & Swabi
- 15- Manager / In-Charge Center for Mentally Retarded & PHC Peshawar & Swabi
- 16- All the official concerned
- 17- Personal file

Deputy Director (Admn)
Social Welfare, SE & WE
Khyber Pakhtunkhwa

30/7/2

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No. 1509/2019.

Mr. Muhammad Aman.....Appellant.

Vs

Secretary to govt. of Khyber Pakhtunkhwa, Zakat & Usher,
and others.....Respondents.

Reply on behalf of respondent No. 4 & 6.

Preliminary Objections:-

1. That the appellant has no cause of action.
2. That the appellant has no locus standi.
3. That the appeal is time barred.
4. That the appellant has joinder and mis-joinder of the necessary parties.


Respectfully Sheweth+

Para 1 to 6 : No Comments

It is submitted that being an administrative matter it relates to respondent No. 1,2,3,5 and 7, and they are in a better position to redress the grievances of the appellant. Besides, the appellant has raised no grievances against respondents No.4 & 6 i.e. Accountant General Khyber Pakhtunkhwa office and District Accounts Office Kohat

Keeping in view the above mentioned facts, it is humbly prayed that the appellant may be directed to approach respondent No. 1,2,3,5 and 7, for the satisfaction of his grievances and the appeal in hand may be dismissed with cost.


DISTRICT ACCOUNTS OFFICER
District Accounts Office
KOHAT
Kohat


ACCOUNTANT GENERAL
KHYBER PAKHTUNKHWA

"B"

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

ABC

No.

Appeal No. 1509 of 20 19

Muhammad Aman Appellant/Petitioner
Versus

Secy Zakat, Ushr Soad w/f Respondent
Respondent No.

Notice to: Akhtar Mehmood s/o Sarwar Khan, Sweeper,
office of DO (SW Kohistan,) Now Junior clerk

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

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

Day of.....20
November 21

2th

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

DBT

No.

Regd

Appeal No..... 1509 of 20 19

..... Muhammad Aman Appellant/Petitioner

Versus

..... Secy Zakat Ushr, Social Welf. etc Respondent

Respondent No..... 8

Notice to:

Zahid Khan s/o Mujafar Khan Naib Qasid
office of The DO / Now Junior clerk BPS-11 / Abbottaba

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....17/12/2021.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this.....2th.....

Day of.....November 20 21.....

M. J. C.

Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

"B"

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

D.B.F

No.

Appeal No. 1509 of 2019

Recd

Muhammad Aman Appellant/Petitioner

Versus

Secy Zakat ushr. Social Welfare Dept. Respondent

Respondent No. 9

Notice to:

Fazal Qadir s/o Rehmat Gul, Naib
Qasid, office of DO (Now Junior Clerk BPS-11)
Dir Upper.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 17/12/2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

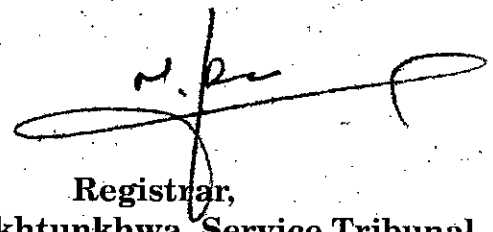
Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition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

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

2/11

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

Day of November 21



Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

“B”

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

D. BE

No.

Recd

Appeal No..... 1509 of 20 19

..... Mahammad Aman Appellant/Petitioner

Versus

..... Secy Zakat ush. Social Welfare Dept Respondent

Respondent No..... 12

Notice to: —

Abdul Hamid s/o Ajram Khan, Chowkidar
office of DO(SW), Peshawar (Now Junior clerk BPS
11)

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on..... 17/12/2021 at 8.00 A.M. If you wish to urge anything against the appelland/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this..... 27th

Day of..... Nov 20 21

Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

D.B.F

No.

Appeal No.....1509..... of 20 19

Recd

Muhammad Aman.....Appellant/Petitioner
Versus

Secy Zakat Ushr Social Welfare.....Respondent
Respondent No.....13.....

Notice to:

Fazal Habib s/o Zadaad Chowkidar, office
of Do (SW) Shangla, (Now Junior Clerk BPS-A)

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....17/12/2019.....at 8.00 A.M. If you wish to urge anything against the appellants/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this.....24.....

Day of.....Nov.....20 19

M. P.
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

DB

(left)
No.

Appeal No. 1509 of 2019

Muhammad Aman Appellant/Petitioner

Versus

Secy, Zakat, Ushy, SW, SE & WED Respondent

Respondent No. (7)

Notice to:

Akhtar Mehmood S/O Sarwar Khan, Sweeper
Office of DO (SW Kohistan) now Junior Clerk

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 24-5-2022 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement along with any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforesaid, the appeal/petition will be heard and decided in your absence.

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

Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this 7th

Day of April 2022


Registrar,

**Khyber Pakhtunkhwa Service Tribunal,
Peshawar.**

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

"B"

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

fed
 No.

DB

Appeal No.....1509..... of 20
 19
Appellant/Petitioner
 Muhammad Aman
 Versus

Secy, Zakat Ushr, SW, SE & WED Respondent
 Respondent No.....
 (08)

Notice to: — Zahid Khan s/o Muzafar Khan Naib Qasid office
 of the DO (SW Abbottabad) now (Junior Clerk BPS-11)

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....24-5-2022.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, on any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this.....11/17th
 Day of.....April.....2022

Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

"B"

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

Refd

DB

No.

Appeal No. 1509 of 20 19.

Muhammad Aman Appellant/Petitioner

Versus

Secy Zakat Uchr SW SE & WED Kohat Respondent:

Respondent No. (09)

Notice to: Fazal Qadir S/O Rehmat Gul, Naib Qasid, Office of DO (SW Div Upper) Now Junior Clerk BPS-112

WHEREAS an appeal/petition under the provision of the Khyber-Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 24-5-2022 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, on any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this 7th

Day of April 20 22

[Signature]
 Registrar,

Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

"B"

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

(Legal)

DB

No.

Appeal No. 1509 of 20 19

..... Muhammad Aman Appellant/Petitioner
 Versus

Secy, Zakat, Ushr, SW, SE&WED Kohat Respondent

Respondent No. 10

Notice to: — Muhammad Ali S/O Kaki Jan, Naib Qasid, Office of DO (SW) Peshawar (Now Junior Clerk BPS-11)

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....24-5-2022.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this.....11.....

Day of.....April.....2022

[Signature]
 Registrar,

Khyber Pakhtunkhwa Service Tribunal
Peshawar.

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

“B”

Left

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

DB

No.

Appeal No. 1509 of 2019.

Muhammed Aman Appellant/Petitioner

Versus

Secy, Zakat, Ushr, SW, SE9, WED Kohat Respondent

Respondent No. 11

Notice to: Sajjad Ali Shah S/O Ghani Naib Qasid office of DO (SW) Peshawar (now Junior Clerk BPS-11)

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 24.5.2022 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 7/4

Day of April 2022

[Signature]
Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

Regd

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

DB

No.

Appeal No. *1509* of 20

19

..... Appellant/Petitioner
Muhammad Aman
Versus

..... Respondent No.
Secy, Zakat, Ushr, SW, SE & WED
(12)

Notice to: — *Abdul Hamid s/o Ajram Khan chowkidar
Office of DO (SW), Peshawar now Junior Clerk*

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on:..... at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

TH

Day of..... 20

April

22

[Signature]
Registrar,

**Khyber Pakhtunkhwa Service Tribunal,
Peshawar.**

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

"B"

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

DB

No.

Appeal No. 1509 of 2019.

Muhammad Aman Appellant/Petitioner

Versus

Seey, Zakat, Ushy, SW, SEA WED Kohat Respondent
 (13)

Respondent No.

Notice to:

Fazal Habib s/o Zaded Chowkidar office
of DO(SW) Shangla (now Junior Clerk PFS-11)

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 24-5-2022 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this 7th

Day of April, 20 22

Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Appeal No. 1509 of 2019

Muhammad Aman Appellant/Petitioner

Versus

Secy, Zakat Ushr, SW, SERWED Kohat Respondent

Respondent No. (08)

Notice to: Zahid Khan s/o Muzafar Khan Naib Qasid office
 of the DO (SW Abbottabad) now (Junior Clerk BPS-11)

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 24-5-2022 at 8:00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement along with any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this 7th
 Day of April 2022

Registrar,

Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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



KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

No. 1191 /ST

Dated: 27/5 /2022

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281

To,


The Editor
Daily Aaj
Peshawar

Subject: Pulication in appeal no. 1509/2019 title Muhammad Aman

Sir,

I am directed to forward herewith for publication in a Daily Aaj Newspaper and also directed to take the expense of advertisement from the appellat under intimation to this office too.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR

بعدالت خیبر پختونخوا سروس ٹریبونل پشاور



ٹائٹل: محمد امان

اپیل نمبر: 1509/2019

بنام

حکومت

نوٹس اشتہار ہذا مدعا علیہم نمبر 7 تا 10 و 12 تا 13

ریسپانڈنٹ نمبر 7

اختر محمود ولد سرور خان، سوپیر (جونئیر کلرک) ڈسٹرکٹ آفیسر سوشل ویلفیئر کوہستان

ریسپانڈنٹ نمبر 8

زاہد خان ولد مظفر خان، نائب قاصد آفس (جونئیر کلرک) ڈسٹرکٹ آفیسر سوشل ویلفیئر ایبٹ آباد

ریسپانڈنٹ نمبر 9

فضل قادر ولد رحمت گل، نائب قاصد (جونئیر کلرک) ڈسٹرکٹ آفیسر سوشل ویلفیئر دیراپر

ریسپانڈنٹ نمبر 10

محمد علی ولد لکی جان، نائب قاصد (جونئیر کلرک) ڈسٹرکٹ آفیسر سوشل ویلفیئر پشاور

ریسپانڈنٹ نمبر 12

عبدالحمید ولد اجرم خان، چوکیدار، (جونئیر کلرک) ڈسٹرکٹ آفیسر سوشل ویلفیئر پشاور

ریسپانڈنٹ نمبر 13

فضل حبیب ولد زداد، چوکیدار، (جونئیر کلرک) ڈسٹرکٹ آفیسر شانگلہ

مقدمہ نمبر 1509/2019 عنوان بالا میں مدعا علیہم نمبر 7 تا 10 و 12 تا 13 مقدمہ میں تعمیل معمول اور

عام طریقے سے ہونی مشکل ہے۔

لہذا مدعا علیہم بالا کو بذریعہ اشتہار ہذا مطلع کیا جاتا ہے کہ وہ مورخہ 28/06/2022 کو اصالتاً و کالتاً مختاراً عدالت ہذا سروس ٹریبونل پشاور حاضر ہو کر مقدمہ ہذا کی پیروی کرے۔ غیر حاضری کی صورت میں ان کے خلاف یکطرفہ کارروائی عمل میں لائی جائیگی۔

یہ مثبت دستخط میرے و مہر عدالت کے مورخہ 27/05/2022 کو جاری کیا گیا۔



رجسٹرار
خیبر پختونخوا سروس ٹریبونل پشاور

ان کے ساتھ ساتھ دوسرے تمام سرکاری اداروں کے

عقدوں کی جو بے دعویٰ

گواہی کا ہے کہ یہاں کے تمام عہدوں کے ایسے 1989
عہدہ زمانہ سے ملنے میں جمع ہوئے۔ وہ تمام کثرت سے
کا ہی اصول ہے۔ اور جس مندرجہ ذیل کے کثرت سے
کوئی سرکاری ادارے

ایک طرف سے ان کے ساتھ

کہ عہدہ کے جو بے دعویٰ ساتھ ہیں وہ دہلی میں
ملے ہیں

عسائی
28/6/22

اس کے

محمد علی احمد صاحب علی شاہ

کھنڈر فنڈ ڈسٹرکٹ پولیس آفیسر صاحب
عنوان = جواب خارج سٹیٹ
جناب عالی -

حوالہ خارج سٹیٹ نمبری 24/8A-1123

تاریخ 20/3/2003 معروضی ہوں کہ میری خلاف

ٹیکس کی الزام یا کھل کے بنیاد ہے۔ میرا کسی خزانہ

پیشہ شخص سے نہ تو اٹھنا ہوتا ہے نہ میری کسی

خزانہ پیشہ سے ٹیکس فون مانا جاتا ہے فون یا کسی اور

طرح سے رابطہ ہے۔ میں اپنا سوال فون میرے

حصول ڈاتا پیش کر سکتا ہوں۔

میں تم قسم کی سزا کھلنے کو تیار ہوں۔ اگر

میرے خلاف ٹیکس سٹوٹ / اشتہادت بددراں

انکو آئری مقدمہ مثل دلا گیا۔ میں سو فیصد

بے گناہ ہوں۔ معلوم ہوتا ہے کہ القمام قبائلی علاقہ

حاجت کے خلاف کسی شخص نے مجھے بدنام کرنے کی

کوشش کی ہے۔ کیونکہ اسے لوگ خاص طور

پر اولیٰ کے خلاف ہیں۔ اور ہم میں توقع رکھتے ہیں

کہ ہم بھی ان کے لقمے قدم پر عمل القمام کے خلاف

آواز اٹھائیں۔ جو ہمیں کسی طور قبول نہیں

میں سرکاری طور پر ملانے میں سرکاری

قد العین ادا کرنا کا اندیشہ ہے۔ کسی شخص کے

سیاسی مقاصد سے تعلق نہیں رکھتا

لہذا استدعا ہے کہ مجھے نہ کہ خلاف

حاجری شدہ حیا جیٹنگ و خوار دقت