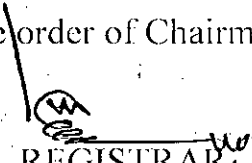


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. - \_\_\_\_\_ 1816/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/12/2022	<p>The appeal of Mr. Feroz Khan presented today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

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

SERVICE APPEAL No. 1516 /2022

**FEROZ KHAN VS LAW DEPTT:**

**I N D E X**

<b>S.NO.</b>	<b>DOCUMENTS</b>	<b>ANNEXURE</b>	<b>PAGE</b>
1.	Memo of appeal with Affidavit	.....	1-3
2.	Copy of the appointment order	A	4
3.	Copies of the Educational Testimonials	B	5-6
4.	Copies of the seniority lists & objection	C, D & E	7-14
5.	Copies of the orders	F & G	15-16
6.	Departmental Appeal	H	17-19
7.	Vakalatnama		20

  
**APPELLANT**

Through:

  
**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**  
**SUPREME COURT OF PAKISTAN**

-1-

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

**APPEAL NO. 1816 /2022**

Mr. Feroz Khan, Naib Qasid (BPS-03)  
Office of the District Attorney,  
Khyber Pakhtunkhwa Service Tribunal Peshawar.

..... **APPELLANT**

**VERSUS**

- 1- The Secretary Law, Parliamentary affairs & Human Rights Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director General Law & Human Rights Department, Khyber Pakhtunkhwa, Peshawar.

..... **RESPONDENTS**

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE INACTION OF THE RESPONDENTS BY NOT INCLUDING NAME OF THE APPELLANT IN THE SENIORITY LIST OF CLASS-IV EMPLOYEES OF THE RESPONDENT DEPARTMENT AND NOT CONSIDERING FOR PROMOTION TO THE POST OF JUNIOR CLERK (BPS-11) AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.**

**PRAYER:**

That on acceptance of this appeal the respondents may kindly be directed to include the name of the appellant in the seniority list of class-IV employees of the respondent Department and also consider the appellant for promotion to the post of Junior Clerk BPS-11 w.e.f. the date of availability of posts/ with all back benefits. Any other remedy which this august Court deems fit may also be awarded in favor of appellant.

**R/SHEWETH:**

**ON FACTS:**

- 1- That appellant was appointed as Naib Qasid in the respondents department vide order 10.8.2009 and start performing his duties quite efficiently up to the entire satisfaction of his superior. Copy of the appointment order is attached as annexure ..... **A.**
- 2- That since appointment till date, the appellant is serving the respondents department for more than 13 years quite efficiently, with zeal and zest and honored an unblemished service record.
- 3- That it is pertinent to mention here that the appellant is a qualified person having Matric and also command on MS office and related programs. Copies of the Educational Testimonials are attached as annexure..... **B.**

- 4- That initially the seniority lists issued by the respondents the name of the appellant was mentioned at the right position but the seniority list issued in the year, 2020 the name of the appellant was missing upon which the appellant submitted objection petition but of no avail. Copies of the seniority lists, objection petition are attached as annexure ..... **C, D & E.**
- 5- That as per record total 45 posts of junior clerks are vacant in the respondent Department in which 18 posts are falling in the promotion zone and as such the appellant is fully entitled for promotion if he has been included in the seniority list mentioned above. That out of 18 posts of junior clerks in promotion quota the respondents have fill up only ten posts from amongst the class-iv employees vide orders dated 1.2.2021 & 8.4.2021 while the remaining 8 posts are still vacant in the offices of District Attorneys. Copies of the orders are attached as annexure ..... **F & G.**
- 6- That felling aggrieved the appellant preferred departmental appeal before the respondent No.1 but no response has been given till the expiry of statutory period of ninety days. Copy of the Departmental Appeal is attached as annexure.....**H.**
- 7- That having no other remedy the appellant filed the instant appeal on the following grounds amongst the others.

**GROUND:**

- A-** That the inaction of the respondents by not including the name of the appellant in the seniority list and not considering him for promotion to the post of junior clerk (BPS-11) is against the law, facts and norms of natural justice.
- B-** That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.
- C-** That the respondent Department acted in arbitrary and malafide manner by not including the name of the appellant in the seniority list and not considering him for promotion to the post of junior clerk (BPS-11).
- D-** That the appellant has been discriminated by the respondent Department on the subject noted above and as such the respondent violated the principle of natural justice.
- E-** That by not including the name of the appellant in the seniority list and not considering him for promotion to the post of junior clerk (BPS-11) the respondents violated section-8 & 9 of the civil servant Act, 1973 read with Rule-7 & 17 of the appointment, promotion and transfers Rules 1989.
- F-** That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

F- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.

**APPELLANT  
FEROZ KHAN**

Dated: \_\_\_\_\_

**THROUGH:**

**NOOR MOHAMMAD KHATTAK  
ADVOCATE SUPREME COURT**

**UMAR FAROOQ MOHMAND**

**WALEED ADNAN**

**MUHAMMAD AYUB**

**&**

**KHANZAD GUL  
ADVOCATES**

**AFFIDAVIT**

I Feroz Khan, Naib Qasid BPS-03, Office of the District Attorney, Khyber Pakhtunkhwa Service Tribunal Peshawar, do hereby solemnly affirm that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

**DEPONENT**

**Government of NWFP,  
Law, Parliamentary Affairs and  
Human Rights Department.**

Dated Peshawar the 10.08.2009.

**ORDER.**

No. E&A(LD)2-77/06.---On the recommendation of the Departmental Selection Committee of the Law Department Mr. Feroz Khan s/o Raza Khan is hereby appointed as Naib Qasid (BPS-1) in the Mufassil Establishment Law Department as per current Government Policy with immediate effect.

2. The terms and conditions are as follows:

- (i) He shall be governed by such rules and orders related to leave, T.A, Medical attendance, pay and other allowances, etc. as have been or may hereafter be framed by the Government from time to time for the category of Government Servant of his status.
- (ii) He shall be on probation for period of 6 months.
- (iii) His services should be liable to termination on one month's notice if not required or found unsatisfactory.
- (iv) In case of he wishes to resign at any time one month notice shall be necessary or in lieu thereof one month's pay shall be forfeited/paid by him to the Government.
- (v) He shall have to produce a medical certificate of fitness from the Medical Superintendent Civil Surgeon, Police and Services Hospital, Peshawar.
- (vi) He shall have to join duty at his own expenses.
- (vii) If he accepts the post on the above terms and conditions, he may report for duty in Law, Parliamentary Affairs and Human Rights Department within fifteen days of receipt of his offer otherwise in case of failure the offer will automatically be cancelled.

**Secretary to Government of NWFP,  
Law, Parliamentary Affairs and  
Human Rights Department.**

Endst: No. E&A(LD)2-77/06

Dated: 10.08.2009.

Copy forwarded to:

1. The Accountant General, NWFP, Peshawar.
2. The District Accounts Officers concerned.
3. The Government Pleader Additional Government Pleaders concerned.
4. The PS to Minister Law.
5. The Accountant, Mufassil Establishment Law Department.
6. The officials concerned.
7. The Personal files of the officials concerned.

**(Sajjad-ur-Rahman)  
Section Officer (G)  
Law Department.**

**BETTER COPY**

**Government of NWFP,  
Law, Parliamentary Affairs and  
Human Rights Department.**

**Dated Peshawar the 10.08.2009.**

**ORDER.**

**No.E&A(LD)2-77/06**, On the recommendation of the Departmental Selection committee of the law Department Mr. Feroz Khan s/o Raza Khan is hereby appointed as Naib Qasid (BPS-1) in the Establishment Law Department as per current Government Polices with immediate effect.

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  - v. He shall have to produce a medical certificate of fitness from the Medical Superintendent Civil Surgeon, Police and Services Hospital, Peshawar.
  - vi. He shall have to join duty at his own expenses.
  - vii. If he accepts the post on the above terms and conditions, he may report for duty in Law, Parliamentary Affairs and Human Rights Department within fifteen days of receipt of his offer otherwise in case of failure offer will automatically be cancelled.

**Secretary to Government of NWFP  
Law, Parliamentary Affairs and  
Human Rights Department.**

**Endst. No. E&A(LD)2-7/06**

**Dated Peshawar 10.08.2009**

S. No. **PBR- 0049967**



Roll No. 19721

"B" -5-

**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION**



**Peshawar N.W.F.P. Pakistan  
Secondary School Certificate Examination**

**SESSION 1992 (ANNUAL)  
(HUMANITIES GROUP)**

THIS IS TO CERTIFY THAT Firoz Khan

Son/Daughter of Raza Khan

and a student of Govt High School, Utmanzai Charsadda.

has passed the *Secondary School Certificate Examination*  
of the Board of Intermediate and Secondary Education, Peshawar held in March 1992  
as a *Regular candidate*. He/She obtained 411 Marks out of 850  
and has been placed in *Grade*  Representing Fair


The Candidate passed in the following subjects:

- |            |                     |                     |                 |
|------------|---------------------|---------------------|-----------------|
| 1. English | 3. Islamiyat        | 5. Gen. Science     | 7. Isl. Studies |
| 2. Urdu    | 4. Pakistan Studies | 6. Gen. Mathematics | 8. Art.         |

He/She has been awarded *Grade*  on the basis of internal  
assessment by the institution concerned.

Date of birth according to admission form is Second May

one thousand nine hundred and Seventy Five (02-5-1975)

  
Asstt. Secretary  
30th July, 1992.

  
Secretary

This certificate is issued without alteration or erasure



GG. No 440323

Board of Intermediate & Secondary Education  
PESHAWAR

DETAILED MARKS CERTIFICATE  
Secondary School Certificate Examination  
(GENERAL GROUP)

-6-

Session 1992 (Annual/Supplementary)

Name Feroz Khan  
Father's Name Raza Khan Roll No. 19721

SUBJECT	Total number of marks allotted	MARKS OBTAINED	
		In figures	In words
1. English	100	66	
2. Urdu	150	78	
3. Islamiyat Comp:	75	56	
4. Pakistan Studies	75	33	
5. Gen: Mathematics	100	38	
6. General Science	100	36	
7. <i>Art</i>	100	71	
8. <i>IS</i>	100	33	
<b>Total</b>	<b>850</b>	<b>411-D</b>	<b>Four Hundred &amp; Eleven</b>

This certificate is issued errors and omissions excepted.

Prepared by [Signature]  
Checked by [Signature]

Date \_\_\_\_\_ 19 \_\_\_\_\_

[Signature]  
Controller of Examinations  
Board of Intermediate & Secondary Education  
PESHAWAR



11C 7-

DIRECTORATE GENERAL  
OF LAW & HUMAN RIGHTS  
KHYBER PAKHTUNKHWA

TENTATIVE SENIORITY LIST OF CLASS-IV (MATRICULATE) (BPS-03)  
OFFICES OF THE DISTRICT ATTORNEYS ALL KHYBER PAKHTUNKHWA (AS STOOD ON 27-01-2020)

S. No	Name of Official	Designation	Date of Birth	Qualification	Domicile	Date of 1 <sup>st</sup> Joining Govt. Services
1.	Mr. Muhammad Yousaf ✓	N/Q	1976	Metric	Kohistan	24.02.2004
2.	Mr. Muhammad Ilyas, ✓	N/Q	03-09-1982	Metric	D.I.Khan	15.01.2007
3.	Mr. Nasir Shah,	N/Q	01-02-1984	Metric	Charsadda	04.06.2008
4.	Mr. Sher Bacha, ✓	N/Q	07-05-1978	Metric	Charsadda	01.07.2008
5.	Mr. Javaid ✓	N/Q	02-10-1966	Metric	Charsadda	07.07.2008 ✓
6.	Mr. Iqbal Zaman ✓	N/Q	05-03-1982	F.A	Charsadda	07.07.2008
7.	Mr. Mukhtiar Ahmad ✓	N/Q	00-05-1970	Metric	Charsadda	02.08.2009
8.	Mr. Farooq Shah ✓	N/Q	09-04-1969	Metric	Charsadda	10.08.2009
9.	Mr. Abdur Rehman Khalid ✓	N/Q	20-05-1970	F.A	Charsadda	10.08.2009
10.	Mr. Shakeel Ahmad ✓	Chowkidar	10-05-1971	F.A	Charsadda	10.08.2009
11.	Mr. Muhammad Yasir ✓	Chowkidar	02-03-1979	Metric	Charsadda	10.08.2009
12.	Mr. Muntazim Shah ✓	N/Q	08-10-1973	(B.A)	Charsadda	10-08-2009
13.	Mr. Said ur Rehman	Chowkidar	01-08-1987	(Metric)	Charsadda	10-08-2009
14.	Mr. Syed Rasool	N/Q	20-09-1975	Metric	Charsadda	10-08-2009
15.	Mr. Gul Alam Jan	Chowkidar	04-05-1979	(F.A)	Charsadda	10-08-2009
16.	Mr. Aziz Ahmad	N/Q	1-5-1977	(F.A)	Charsadda	10-8-2009
17.	Mr. Muhammad Imran Khan	Chowkidar	15-03-1986	(B.A)	Peshawar	10-08-2009
18.	Mr. Noor Alam	N/Q	09-01-1989	(F.A)	Charsadda	10-08-2009
19.	Mr. Sajid Khan S/O Muhammad Ayaz	Chowkidar	18-05-1985	(F.A)	Charsadda	10-08-2009
20.	Mr. Taimur Khan	Chowkidar	07-04-1989	(F.A)	Charsadda	17-8-2009
21.	Mr. Nasir Shah	Chowkidar	02-04-1983	(F.A)	Charsadda	18-08-2009

22	Mr. Fawad Ahmad	N/Q	27-3-1985	(Metric)	Charsadda	01-09-2009
19	Mr. Sikandar Khan	N/Q	03-01-1991	(Metric)	Charsadda	04-09-2009
20	Mr. Farhad Ali	Chowkidar	08-01-1991	(F.A)	Charsadda	04-09-2009
21	Mr. Hayat Muhammad	Chowkidar	09-04-1974	(Metric)	Charsadda	14-09-2009
22	Mr. Imran Khan S/o Sahibzada	Chowkidar	18-03-1985	(F.A)	Charsadda	14-09-2009
23	Mr. Zabar Dast Khan	N/Q	01-11-1977	(FA)	Shangla	01-04-2011
24	Mr. Safer Ullah Shah	N/Q	10-03-1990	(Metric)	Battagram	11-04-2011
25	Mr. Inam Ullah	Chowkidar	15/09/1983	F.A	Peshawar	08-08-2011
26	Mr. Mudassir Shah	N/Q	4-1-1982	(BA)	Charsadda	10-08-2011
27	Mr. Afsar Ali	N/Q	02-04-1992	(Metric)	Peshawar	10-08-2011
28	Mr. Hazrat Zaman	N/Q	12-04-1983	(Metric)	Charsadda	10-08-2011
29	Mr. Aziz Ahmad	N/Q	02-04-1977	(BA)	Dir Lower	20-08-2011
30	Mr. Bakhat Room	N/Q	08-04-1977	BA, DIT	Swat	26-09-2011
31	Mr. Naisr Khan	Chowkidar	15-05-1974	(F.A)	Charsadda	08-08-2011
32	Mr. Imtiaz Khan	N/Q	11-02-1972	(F.A)	Charsadda	15-03-2012
33	Mr. Diyar Khan	Sweeper	01-04-1975	(Metric)	Charsadda	15-3-2012
34	Mr. Nadeem Khan	Chowkidar	05-04-1976	(F.A)	Charsadda	15-03-2012
35	Mr. Tahir Shah	N/Q	05-04-1977	(Metric)	Charsadda	15-03-2012
36	Mr. Sajid Ali	Sweeper	01-03-1981	(Metric)	Charsadda	15-03-2012
37	Mr. Arshad Ali					
38	Mr. Zahoor Khan	Chowkidar	15-03-1982	(Metric)	Charsadda	15-03-2012
39	Mr. Nasrullah	N/Q	11-04-1983	(F.A)	Charsadda	15-03-2012
40	Mr. Gul Khan	N/Q	24-03-1986	(Metric)	Charsadda	15-03-2012
41	Mr. Wajid Ali	Chowkidar	02-03-1987	(BA)	Charsadda	15-3-2012
42	Mr. Kashif Jan	N/Q	03-03-1991	(F.A)	Charsadda	15-03-1012
43	Mr. Mushfaq Ali	N/Q	15-8-1972	(B.Com)	Charsadda	17-03-2012
44	Mr. Sabz Ali	Chowkidar	1974	(Metric)	Charsadda	17-03-2012
45	Mr. Asghar Khan	Chowkidar	2-1-1979	(Metric)	Charsadda	17-3-2012
46	Mr. Niaz Mohammad	Sweeper	02-05-1982	F.A	Charsadda	17-03-2012
47	Mr. Kashif Khan	Chowkidar	01-01-1985	(Metric)	Charsadda	17-3-2012
48	Mr. Abdul Aziz	Chowkidar	5-4-1986	(B.A)	Charsadda	17-3-2012
49	Mr. Muhammad Jehangir	N/Q	4-2-1988	(F.A)	Charsadda	17-03-2012
50	Mr. Saddam Hussain	N/Q	01-03-1992	(F.A)	Charsadda	19-03-2012
51	Mr. Afatb ahmed	Nalb Gasid	15-09-1975	SSC	Peshawar	03-10-2012
52	Mr. Rahat Ullah	Nalb Gasid	01-01-1990	SSC	Khyber	03-10-2012

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53.	Mr. Harid Ur Rehman	Naib Qasid	04-04-1974	FA	Agency	03-10-2012
54.	Mr. Asim Ali Khan	Naib Qasid	01-05-1977	BA	Charsadda	03-10-2012
55.	Mr. Fazal Muhammad Roshan	N/Qasid	06-08-1969	SSC	Charsadda	03-10-2012
56.	Mr. Abdus Sattar	Naib Qasid	01-01-1979	SSC	Charsadda	03-10-2012
57.	Mr. Gulzar Ali	Naib Qasid	01-09-1970	BA	Charsadda	03-10-2012
58.	Mr. Farman ul haq	Naib Qasid	04-02-1990	FA	Charsadda	03-10-2012
59.	Mr. Salim shah	Naib Qasid	30-08-1975	BA	Charsadda	03-10-2012
60.	Mr. Liaqat shah	Naib Qasid	10-04-1993	SSC	Charsadda	03-10-2012
61.	Mr. Muhammad Usman	Naib Qasid	27-01-1993	DAE	Charsadda	03-10-2012
62.	Mr. Imran khan	Naib Qasid	02-03-1979	SSC	Charsadda	03-10-2012
63.	Mr. Lal badshah	Naib Qasid	15-01-1973	SSC	Charsadda	03-10-2012
64.	Mr. Mussawir Shah	Naib Qasid	01-01-1982	SSC	Charsadda	03-10-2012
65.	Mr. Rizwan ullah	Naib Qasid	31-03-1968	SSC	Charsadda	03-10-2012
66.	Mr. Muhammad ali	Naib Qasid	06-04-1991	BA	Charsadda	03-10-2012
67.	Mr. Ramez jan	Naib Qasid	05-05-1991	DAE	Charsadda	03-10-2012
68.	Mr. Shah Faisal s/o Saif ur Rehman	Naib Qasid	01-05-1988	BA	Charsadda	03-10-2012
69.	Mr. Amer zeb	Naib Qasid	10-01-1994	DAE	Charsadda	03-10-2012
		Naib Qasid	17-11-1971	SSC	Charsadda	03-10-2012
71.	Mr. Zain Ullah Jan	Naib Qasid	13-04-1991	FA	Charsadda	03-10-2012
72.	Mr. Qaisar Khan	Naib Qasid	05-04-1991	BA	Peshawar	03-10-2012
73.	Mr. Zafar Ali	Naib Qasid	06-07-1974	SSC	Charsadda	03-10-2012
74.	Mr. Abdul Ghafoor	Chowkidar	18-04-1994	SSC	Charsadda	03-10-2012
75.	Mr. Izat Shah	Chowkidar	31-08-1971	SSC	Charsadda	03-10-2012
76.	Mr. Hassan Shah	Chowkidar	15-03-1990	FA	Charsadda	03-10-2012
77.	Mr. Bashir Ahmed	Chowkidar	14-02-1986	SSC	Charsadda	03-10-2012
78.	Mr. Wisal Khan	Chowkidar	10-04-1983	SSC	Charsadda	03-10-2012
79.	Mr. Fawad Khan	Chowkidar	05-04-1990	SSC	Charsadda	03-10-2012
80.	Mr. Bahar Ali	Chowkidar	30-07-1990	SSC	Charsadda	03-10-2012
81.	Mr. Ihsan Ullah S/O Noor Muhammad	Chowkidar	01-04-1973	SSC	Momand Agency	03-10-2012
82.	Mr. Tahir Shah	Chowkidar	04-02-1992	SSC	Charsadda	03-10-2012
83.	Mr. Muhammad Adil S/o Zafar Ullah	Chowkidar	05-09-1992	DAE(Ele: Tech)	Charsadda	03-10-2012
84.	Mr. Kausar Ali	Chowkidar	01-12-1979	SSC	Charsadda	03-10-2012

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85	Mr. Ihsan Ullah S/O Ikram Ud Din	Chowkidar	08-02-1969	SSC	Mardan	03-10-2012
86	Mr. Tufail Jan	Chowkidar	01-01-1987	FA	Charsadda	03-10-2012
87	Mr. Qaiser Shah	Chowkidar	15-09-1981	SSC	Charsadda	03-10-2012
88	Mr. Muhammad Junaid	Chowkidar	01-11-1983	SSC	Charsadda	03-10-2012
89	Mr. Fazle Malik	Chowkidar	16-05-1980	SSC	Peshawar	03-10-2012
90	Mr. Amir Muhammad Khan	Chowkidar	08-05-1977	FA	Charsadda	03-10-2012
91	Mr. Mir Azam Khan	N/Q	01-05-1993	B.A	Swabi	18-01-2014
92	Mr. Kamran S/o Muhammad Aslam	Chowkidar	06-04-1984	F.A	Haripur	25-08-2014
93	Mr. Malik Umair Wajid	NQ	07-07-1996	FSC	Peshawar	08-06-2015
94	Mr. Adnan Yasir S/O Iqbal Hussain	Chowkidar	06.10.1988	B.A	Swat	14.10.2016

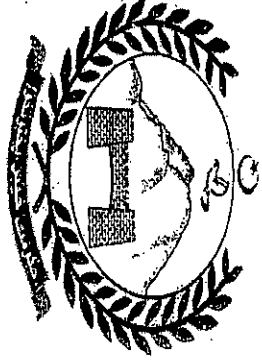
**DIRECTOR GENERAL  
FOR LAW & HUMAN RIGHTS  
KHYBER PAKHTUNKHWA**

**ENST. NO. LG/SL/AD/SENIORITY/2-1/1/2019:**

Copy forwarded to:-

1. All District Attorneys in Khyber Pakhtunkhwa is requested to circulate seniority list amongst concerned staff.
2. PS to Secretary, Law Department.
3. Reference & Research Officer, Law Department is requested to upload on Law Department Website.

  
**ASSISTANT SOLICITOR (M&E)**



**GOVERNMENT OF KHYBER PAKHTUNKHWA  
LAW, PARLIAMENTARY AFFAIRS &  
HUMAN RIGHTS DEPARTMENT**

Dated Pesh; the 28/ 05 /2013

**Final seniority list of Matriculate class-IV employees of the Government Pleaders offices in Khyber Pakhtunkhwa**

S. No	Name of Official with Designation And Qualification	Date of Birth	Qualification	Year of passing	Domicile	Date of 1 <sup>st</sup> Joining Govt: Services
1.	Muhammad Yousef, N/Q, Matric	1976	Matric		Kohistan	03-03-2004
2.	Tahir Shah, N/Q, (Matric)	12-04-1986	(Matric)		Peshawar	15-06-2006
3.	Muhammad Ilyas, N/Q, (Matric)	03-09-1982	(Matric)		D.I. Khan	01-02-2007
4.	Zakir Shah, N/Q, (F.A)	15-12-1987	(F.A)		Peshawar	19-09-2007
5.	Hidayatullah, N/Q, (D.Com)	01-01-1989	(D.Com)		Nowshera	01-10-2007
6.	Ababs Khan, N/Q, (Matric)	02-02-1983	(Matric)		Peshawar	10-10-2007
7.	Anwar Iqbal, N/Q, (Matric)	14-03-1977	(Matric)		Peshawar	11-12-2007
8.	Abid Shah, N/Q, (Matric)	25-05-1978	(Matric)		Charsadda	04-06-2008
9.	Sher Bacha, N/Q, (Matric)	07-05-1978	(Matric)		Charsadda	01-07-2008
10.	Javaid, N/Q, (Matric)	02-10-1966	(Matric)		Charsadda	07-07-2008
11.	Harid Ali, N/Q, (F.A)	17-10-1977	(F.A)		Charsadda	08-07-2008
12.	Lal Zaman, N/Q, (F.A)	05-03-1982	(F.A)		Charsadda	01-08-2008
13.	Mukhtiar Ahmad, N/Q, (Matric)	08-09-1976	(Matric)		Charsadda	11-09-2008
14.	Ihsan Muhammad, N/Q, (Matric)	01-05-1982	(Matric)		Charsadda	07-10-2008
15.	Farooq Shah, N/Q, (Matric)	09-04-1969	(Matric)		Charsadd	10-08-2009
16.	Abdur Rehman Khalid, N/Q, (F.A)	20-05-1970	(F.A)		Charsadda	10-08-2009

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18	Shakeel Ahmad, Chowkidar, (Matric)	10-05-1971	(Matic)	Charsadda	10-08-2009
19	Muhammad Yasir Chowkidar (Matic)	02-03-1979	(Matic)	Charsadda	10-08-2009
20	Muntazim Shah, N/O, (B.A)	08-10-1973	(B.A)	Charsadda	10-08-2009
21	Said ur Rehman, Chowkidar, (Matic)	01-08-1987	(Matic)	Charsadda	10-08-2009
22	Gul Alam Jan, Chowkidar, (Matic)	04-05-1979	(Matic)	Charsadda	10-08-2009
23	Aziz Ahmad, N/O, (F.A)	01-05-1977	(F.A)	Peshawar	10-08-2009
24	Muhammad Imran Khan, Chowkidar, (F.A)	15-03-1986	(F.A)	Charsadda	10-08-2009
25	Noor Alam, N/O, (F.A)	09-01-1989	(F.A)	Charsadda	17-08-2009
26	Feroz Khan S/o Raza Khan, Matic	02-05-1975	Matic	Charsadda	18-08-2009
27	Taimur Khan, Chowkidar, (F.A)	07-04-1989	(F.A)	Charsadda	01-09-2009
28	Nasir Shah, Chowkidar, (F.A)	02-04-1983	(F.A)	Charsadda	04-09-2009
29	Fawad Ahmad N/O, (Matic)	27-3-1985	(Matic)	Charsadda	04-09-2009
30	Sikandar Khan, N/O, (Matic)	03-01-1991	(Matic)	Charsadda	14-09-2009
31	Fahad Ali, Chowkidar, (F.A)	08-01-1991	(F.A)	Charsadda	14-09-2009
32	Hayat Muhammad, Showkidar, (F.A)	09-04-1974	(F.A)	Charsadda	01-04-2011
33	Imran Khan, Chowkidar, Matic	18-03-1985	(Matic)	Shangla	11-04-2011
34	Zabar Dast Khan, N/O, (F.A)	01-11-1977	(F.A)	Battagram	08-08-2011
35	Safeer Ullah Shah, N/O, (Matic)	10-03-1990	(Matic)	Charsadda	10-08-2011
36	Nasir Khan, Chowkidar, (F.A)	15-05-1974	(F.A)	Charsadda	10-08-2011
37	Mudassir Shah, N/O, (B.A)	04-01-1982	(B.A)	Peshawar	10-08-2011
38	Afsar Ali, N/O, (Matic)	02-04-1992	Matic	Charsadda	20-08-2011
39	Hazrat Zaman, N/O, (Matic)	12-04-1983	Matic	Dir Lower	26-09-2011
40	Aziz Ahmad, N/O, (B.A)	02-04-1977	(B.A)	Swat	15-03-2012
41	Bakhat Room, N/O, (F.A)	08-04-1977	(F.A)	Charsadda	15-03-2012
42	Imtiaz Khan, N/O, (F.A)	11-02-1972	(F.A)	Charsadda	15-03-2012
43	Diyar Khan, Sweeper, (Matic)	01-04-1975	(Matic)	Charsadda	15-03-2012
44	Nadeem Khan, Chowkidar, (F.A)	05-04-1976	(F.A)	Charsadda	15-03-2012
45	Tahir Shah, N/O, (Matic)	05-04-1977	(Matic)	Charsadda	15-03-2012
46	Sajid Ali, Sweeper, (Matic)	01-03-1981	(Matic)	Charsadda	15-03-2012
47	Aftab Ahmad Khan, N/O, (Matic)	15-01-1982	Matic	Charsadda	15-03-2012
48	Zahoor Khan, Chowkidar, (Matic)	15-03-1982	(Matic)	Charsadda	15-03-2012
49	Nasr Ullah, N/O, (F.A)	11-04-1983	(F.A)	Charsadda	15-03-2012
50	Gul Khan, N/O, (Matic)	24-03-1986	(Matic)	Charsadda	15-03-2012

OFFICE OF  
THE DISTRICT ATTORNEY,  
KHYBER PAKHTUNKHWA,  
SERVICE TRIBUNAL PESHAWAR.

No. 164-167  
Dated. 27.07.2020

To

The Director General for Law & Human Rights  
Khyber Pakhtunkhwa, Hayatabad  
Peshawar.

Subject: - OBJECTIONS/APPLICATIONS IN RESPECT OF THE STAFF FOR  
CORRECTION IN THE RESPECTIVE FINAL/TENTATIVE SENIORITY  
LIST.

Dear Sir,

With reference to the subject Seniority Lists issued vide Director General of Law and Human Rights Khyber Pakhtunkhwa Letter No. DG/SOL/LD/Seniority/ 2-17/2019/4911-39, Dated 13-07-2020 and Letter No. DG/SOL/LD/Seniority/ 2-17/2019/ 4472-50, Dated 29-06-2020, the following officials have raised objections.

The objections are submitted before your goodself for onward course of action please.

Note: Objections /Applications are annexed /Flagged as A,B,C.

Serial No	Name	Designation
01.	Saeed Iqbal	Senior Clerk
02.	Feroz Khan	Naib Qasid
03.	Muhammad Junaid	Chowkidar

(USMAN GHANI MARWAT)  
DISTRICT ATTORNEY  
KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL  
PESHAWAR

Copy forwarded to:

1. Saeed Iqbal (Senior Clerk)
2. Feroz Khan (Naib Qasid)
3. Muhammad Juanid (Chowkidar)

DISTRICT ATTORNEY  
KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL  
PESHAWAR



To,

-14-

The Director General For  
Law & Human Rights Khyber Pakhtunkhwa,  
Peshawar.

**Through:- PROPER CHANNEL**

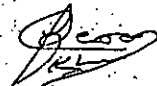
**Subject: - OBJECTION ON TENTATIVE SENIORITY LIST OF OFFICIALS  
AS STOOD ON 29-06-2020.**

Respected Sir,

Kindly refer to subject noted above and to state that I have been appointed as Naib Qasid on 18-08-2009 but unfortunately my name has not been mentioned in any of the seniority list have been issued by department even in the seniority list of Naib Qasid stood on 29-06-2020 issued by office of the Director General of Law and Human Rights Khyber Pakhtunkhwa Peshawar.

It is, therefore, requested that my name may kindly be mentioned in the final seniority list in the right position. (Relevant documents are attached)

Your's faithfully,



(Feroz Khan)  
Naib Qasid

District Attorney Office  
Khyber Pakhtunkhwa, Service Tribunal,  
Peshawar.



Phone: 091-9217204  
Email: dhr.kpk@gmail.com  
Website: www.humanrights.kp.gov.pk  
Plot No. 21, Sector B-2, Phase-V, Hayatabad, Peshawar.

7F-15-

Dated Peshawar, the 01/02/2021

**ORDER:-**

No. DG/SLT/AD/Promotion/2-16/2019/1149-66 On the recommendation of the Departmental Promotion Committee the competent authority is pleased to promote the following Naib Qasids (BPS-03) of the Offices of District Attorneys in Khyber Pakhtunkhwa to the post of Junior Clerk (BPS-11) on regular basis with immediate effect.

S. No.	Name of the Official
1.	Mr. Muhammad Yousaf
2.	Mr. Muhammad Ilyas,
3.	Mr. Sher Bacha,
4.	Mr. Javaid
5.	Mr. Lal Zaman
6.	Mr. Mukhtiar Ahmad

1. The Officials on promotion will remain on Probation in term of Section 6(2) of the Khyber Pakhtunkhwa Civil Servant, 1973 read with the amendment Rule 15(1&4) of the Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion & Transfer) Rules, 1989, for one year, if not extended for another year.

**-SD-**  
**DIRECTORATE GENERAL**  
Law and Human Rights Khyber  
Pakhtunkhwa

No. DG/SLT/AD/Promotion/2-16/2019:-

Dated Peshawar, the 01/02/2021

Copy Forwarded for Information to:

1. Accountant General, Khyber Pakhtunkhwa.
2. PS to Secretary Law, Parliamentary Affairs and Human Rights Department.
3. PA to director General, Law and Human Rights.
4. All District Attorneys Offices in Khyber Pakhtunkhwa.
5. All District Accounts Offices concerned.
6. Official Concerned for Compliance.
7. Master File for Record.

1332

**D.O.**  
**DISTRICT ATTORNEY**  
**PESHAWAR**

**ASSISTANT SOLICITOR**  
**(M&E)**

BETTER COPY

**Directorate General  
Law, Parliamentary Affairs and  
Human Rights Department.**

Dated Peshawar the 01.02.2021.

**ORDER.**

**No.DG/SLT/AD/Promotion/2-16/2019/1149-66**, On the recommendation of the Departmental Promotion Committee the competent authority is pleased to promote the following Naib Qasid (BPS-03) of the Offices of District Attorneys in Khyber Pakhtunkhwa to the post of Junior Clerk (BPS-11) on regular basis with immediate effect.

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**Directorate General  
Law & Human Rights Department  
Khyber Pakhtunkhwa**

Endst. No.DG/SLT/AD/Promotion/2-16/2019/1149-66,

Dated 01.02.2021



-16- 299

**DIRECTORATE GENERAL OF LAW & HUMAN RIGHTS  
KHYBER PAKHTUNKHWA, PESHAWAR**

Phone: 091-9217202, 9217203  
Email: [dlr.kpk@gmail.com](mailto:dlr.kpk@gmail.com)  
Website: [www.humanrights.kp.gov.pk](http://www.humanrights.kp.gov.pk)  
Plot No. 21, Sector B-2, Phase-V, Hayatabad, Peshawar

Dated: 08/04/2021

**ORDER:**

**No. DG/SLT/AD/Posting/Transfer/2-2/2019:-** 16263-93  
The Competent Authority is pleased to adjust the following Junior Clerks (BPS-11) upon promotion of District Attorney Offices Khyber Pakhtunkhwa in the best public interest with immediate effect:-

S#	Name of Official	From	To
1.	Mr. Farooq Shah	District Attorney Office Mansehra.	District Attorney Office Dir Lower. (Against the vacant post)
2.	Mr. Abdur Rehman Khalid	District Attorney Office Buner.	District Attorney Office Abbottabad (Against the vacant post)
3.	Mr. Muntazim Shah	District Attorney Office Charsadda.	District Attorney Office Charsadda (Against the vacant post)
4.	Mr. Shakeel Ahmad	District Attorney Office Abbottabad.	District Attorney Office Buner (Against the vacant Post)

-SD-  
**DIRECTOR GENERAL**  
Law and Human Rights  
Khyber Pakhtunkhwa

**No. DG/SLT/AD/Promotion/2-16/2019:-**

Dated Peshawar, the 08/04/2021

Copy Forwarded for Information to:

1. Accountant General, Khyber Pakhtunkhwa.
2. PA to Director General, Law and Human Rights.
3. All District Attorneys Offices in Khyber Pakhtunkhwa.
4. All District Accounts Office concerned.
5. Master File for Record.

  
ASSISTANT SOLICITOR

H

-17-

"H"



OFFICE OF THE  
DISTRICT ATTORNEY,  
SWAT

No. 229 /ODA/I.File

Dated: 24-08-2022



The Secretary,  
Law Parliamentary affairs & Human Rights,  
Government of Khyber Pakhtunkhwa.

Subject: - DEPARTMENTAL APPEAL

R/Sir,

Enclosed please find herewith, a self-explanatory Departmental appeal in respect of Mr. Feroz Khan Naib Qasid is hereby submitted for your kind consideration and perusal please.

DISTRICT ATTORNEY  
SWAT

-18-

To,

The Secretary to Government of Khyber Pakhtunkhwa,  
Law Parliamentary affairs & Human Rights Department,  
Peshawar.

Subject:- DEPARTMENTAL APPEAL


R/Sir,

Respectfully Sheweth,

1. That I have been serving in Law Department's District Attorney Wing as N/Q since 2009.
2. My seniority number in the Seniority List of Class-IV was 11 but my name was excluded from the seniority list of Class-IV in 2020. I was also informed the Directorate General of Law & H.Rs KPK in time. (copy of objection annexed)
3. That the Directorate General of Law & H.R had been advertised jobs in various cadre in the year 2020 and later on the Department were made appointment on that posts.
4. That I did not have any information/idea about the vacant posts of junior clerk at the time of advertisement nor had mentioned the number of the said post by the Directorate General in his advertisement.
5. Now, I have come to know through some reliable source that more than 33 numbers of posts of junior clerks were vacant in 2020 & 2021.
6. Ten (10) posts of the Junior Clerks out of 33 posts were filled on promotion bases while the rest of other was filled with fresh recruitments which were more than the prescribed limit (67%) quota.
7. It is worth to mention here that the department were filled the post of junior clerk through fresh recruitment and ignored the quota of class-IV employee.
8. As you well aware that all the employees serve with the hope that one day they will get promotion from lower scale to higher scale and their financial condition will become better.
9. But I am to say with sorrow that I was deprived from my legal rights and my post was given to another person.
10. If the Directorate had acted upon the prescribed quota I would certainly had promoted to the post of junior clerk.

In light of the above facts the appeal may please be accepted and give the right to the appellant in light of the prescribed 33% quota for Class-IV in the cadre of Junior clerk and oblige please.

Your's obediently



Feroz Khan (NQ)

O/O District Attorney Swat

Mobile No.03449101883



-19- 29/9/22

GOVERNMENT OF KHYBER PAKHTUNKHWA LAW,  
PARLIAMENTARY AFFAIRS & HUMAN RIGHTS  
DEPARTMENT

/10496-99

NO. SO(E)LD/15-1/Misc/2022/  
Dated Peshawar the 16.09.2022

To

The Director General,  
Law and Human Rights, Khyber Pakhtunkhwa,  
Peshawar.

Subject: **DEPARTMENTAL APPEAL.**

Respected Madam,

I am directed to refer to the subject noted above and to enclose herewith a copy of self-explanatory letter No. 229/ODA/I.File dated: 24.08.2022 alongwith its enclosures received from District Attorney, Swat and to request to kindly submit report at the earliest, please.

Yours faithfully,

(Muhammad Bilal)  
Section Officer (Estt:)

**Ends: No. & Date Even:**  
**Copy forwarded to the:-**

1. District Attorney, Swat w/r to his letter quoted above.
2. PS to Secretary Law, Parliamentary Affairs and Human Rights Department.
3. PA to Deputy Secretary (Admn), Law Department.

Section Officer (Estt:)

قیمت 50 روپے	53105			
ایڈوکیٹ: <u>لو محمد خٹک</u>		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل / ایسوسی ایشن نمبر:				
رابطہ نمبر:				

بعدالت جناب: محمد رسول خاں

مخانب: <u>سائیل / صدیقی</u>	دعوی: <u>سروس ایل</u>
	علت نمبر: _____
	مورثہ: _____
	جرم: _____
	تھانہ: _____

### باعث تحریر آنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ  
 آن مقام محمد رسول خاں کیلئے لو محمد خٹک + محمد عارف + محمد عارف + محمد عارف کو اپیل مقرر  
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو  
 راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعوی اقبال دعوی اور درخواست از ہر قسم کی تصدیق  
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز  
 دائرہ کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب  
 مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا سببختہ پر داخست منظور و قبول ہوگا  
 دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے  
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

محمد رسول خاں



المرقوم:

مقام: لسلام کے لیے منظور ہے۔

Attested & Accepted

نوٹ: اس وکالت نامہ کی فونو کالی ناقابل قبول ہوگی۔  
