

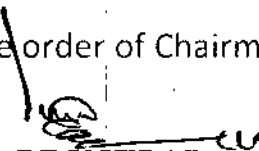


Form- A

FORM OF ORDER SHEET

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

Execution Petition No. 759/2022

S No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	29.12.2022	<p>The execution petition of Mr. Sultan Mehmood submitted today by Mr. Abdul Rehman Qadar Advocate. It is fixed for implementation report before touring Single Bench at A.Abad on _____. Original file be requisitioned. AAG has noted the next date. The respondents be issued notices to submit compliance/implementation report on the date fixed.</p> <p>By the order of Chairman  REGISTRAR</p>

AAG

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

Implementation Petition No. 259 / 2022

In

Service Appeal No. 351 / 2014

Sultan Mehmood S/o Fida Muhammad.

Versus

Province of KPK through Secretary Environment Dept. & others.

**SERVICE APPEAL**

**APPLICATION FOR IMPLEMENTATION OF ORDER PASSED  
BY THIS HONOURABLE TRIBUNAL DATED 22-07-2022 IN  
SERVICE APPEAL NO. 351/2014.**

**INDEX**

S.NO.	Description of Documents	Annexures	Pages
1.	Application for implementation of order dated <u>22-07-2022</u> alongwith Affidavit.	A	1-5
2.	Copy of amended service appeal.	A-1	6-11
3.	Copy of the Inquiry Report dated <u>20-03-2017</u> .	B	12-15
4.	Copy of the application dated <u>29-7-2022</u> .	C	16
5.	Copies of the order dated <u>22-07-2022</u> and the order of rejection dated <u>18-11-2022</u>	D & E	17-18
6.	Vakalatnama		19

Dated: 20-12-2022

Applicant  
Sultan Mehmood

Through

(ABDUL REHMAN QADAR)  
Advocate Supreme Court of Pakistan,

Office No. 2 & 3, Lower Ground Floor,  
Rafay Mall, Peshawar Road, Rawalpindi.  
Office No. 66, Block -A, Judicial Complex, Haripur.  
Mobile: 0333-5628527  
Email: [rehmanqadar007@gmail.com](mailto:rehmanqadar007@gmail.com)

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

Implementation Petition No. 259 / 2022

In

Service Appeal No. 350 / 2014

Sultan Mehmood S/o Fida Muhammad resident of Gulfam Town,  
Mian-de-Seri, Tehsil and District, Abbottabad.

..... Applicant

Versus

1. Province of Khyber Pakhtunkhwa through Secretary Environment Department, Peshawar.
2. Chief Conservator of Forests, Central Southern Forests Region-I, Shami Road, Peshawar.
3. Chief Conservator of Forests, Northern Forest Region-II, Abbottabad.
4. Conservator of Forest / Project Director, Watershed Management Circle, Abbottabad.

..... Respondents

**SERVICE APPEAL**

**APPLICATION FOR IMPLEMENTATION OF  
ORDER PASSED BY THIS HONOURABLE  
TRIBUNAL DATED 22-07-2022 IN SERVICE  
APPEAL NO. 350/2014.**

Respectfully Sheweth:

That the Applicant had filed the above titled Service Appeal before this Honourable Tribunal being aggrieved from the final order dated

2

03-01-2014, whereby his departmental appeal for confirmation as Deputy Ranger was rejected by Respondent No.2 without any reason. (Copy of the amended service appeal is appended herewith.)

2. That during pendency of service appeal, a Departmental Inquiry was conducted, the Inquiry Committee submitted its detailed report and in the last Para of the Inquiry Report, the following recommendations were made:-

**"Since the Appellant has deprived from the legal right of timely promotion / seniority hence, the Committee recommend restoration of the seniority in the Cadre of D/Ranger from the date of promotion order No.12 dated 08-10-2013 with consideration of case for further promotion as Forest Ranger subject to condition that the Appellant shall withdraw his case / appeal from the Court of Khyber Pakhtunkhwa Service Tribunal."**

—Sd—  
Qazi Muhammad Younas  
Conservator of Forests  
Upper Hazara Forest Circle  
Mansehra (Member)

—Sd—  
Mr. Zahoor Jan  
Senior Clerk office of  
Chief Conservator of Forests  
Central Southern Forest Region-I,  
Peshawar (Member)

—Sd—  
Mr. Javd Arshad  
Conservator of Forests  
Watershed Management Circle  
Abbottabad (Chairman)

**(Copy of the Inquiry Report is appended herewith.)**

3. That the service appeal filed by the applicant / appellant came up for hearing before this Honourable Tribunal on 22-07-2022, the Counsel for the Applicant / Appellant referred the last Para of

(3)

Inquiry Report dated 20-03-2017 whereby the grievance of the Applicant / Appellant was decided to be redressed subject to withdrawal of service appeal filed before this Honourable Tribunal.

4. That the Counsel for the Applicant / Appellant made a request before this Honourable Tribunal that the appeal may be disposed of in terms of the recommendation of the Departmental Inquiry committee dated 20-03-2017, so that the Applicant / Appellant may get his rights.
5. That this Honourable Tribunal while accepting the request, passed the following order :-

***"Disposed of accordingly."***

6. That after the decision dated 22-07-2022, the Applicant / Appellant submitted an application to the Chief Conservator of Forests, Central Southern Forest Region Peshawar with copies to all concerned with a request that the seniority of the Applicant / Appellant as Deputy Ranger w.e.f. 08-10-2013 and promotion as Forest Ranger w.e.f. 14-11-2016, in line with the recommendations of the Inquiry Report dated 20-03-2017, culminated in the decision of this Honourable Tribunal dated 22-07-2022. (Copy of the application dated <sup>29-7-22</sup> 08-03-2022 is filed herewith.)
7. That the request of the Applicant / Appellant to implement the recommendation / decision of the Inquiry Committee dated 20-03-2017, on the basis of which, the appeal filed by the Applicant

(4)

/ Appellant was disposed of, has been rejected by the Respondent No. 2 hence, this application for the implementation of the order dated 22-07-2022. (Copies of the order dated 22-07-2022 and the order of rejection dated 18-11-2022 are appended herewith.)

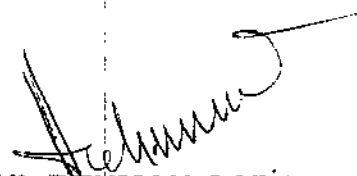
***"It is therefore, respectfully prayed that the recommendation of the Inquiry Report dated 20-03-2017, culminated in the order of this Honourable Tribunal dated 22-07-2022 may graciously ordered to be implemented in letter and spirit forthwith."***

Dated: 20-12-2022

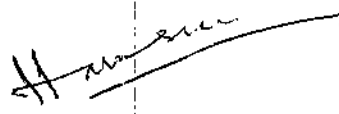


**Applicant / Appellant  
Sultan Mehmood**

Through:



**(ABDUL REHMAN QADAR)**  
Advocate Supreme Court of Pakistan,  
Office No. 2 & 3, Lower Ground Floor,  
Rafay Mall, Peshawar Road, Rawalpindi.  
Office No. 66, Block -A, Judicial Complex, Haripur.  
Mobile: 0333-5628527  
Email: [rehmanqadar007@gmail.com](mailto:rehmanqadar007@gmail.com)



**(HASSAN QADIR KHAN)**  
Barrister at Law,  
Office No. 2 & 3, Lower Ground Floor,  
Email: [barristerhqk@gmail.com](mailto:barristerhqk@gmail.com)

(5)

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

Implementation Petition No. \_\_\_\_\_ / 2022

In

Service Appeal No. 351/2014

Sultan Mehmood S/o Fida Muhammad.

..... Applicant

Versus

Province of KPK through Secretary Environment Dept. & others.

... Respondents

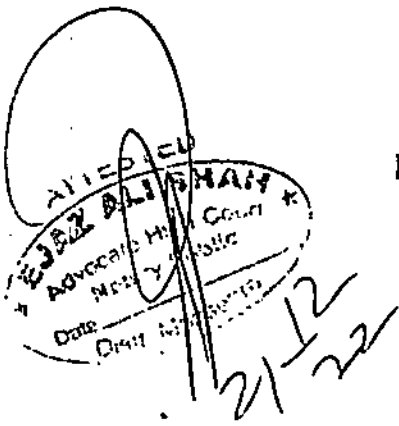
**SERVICE APPEAL**

**APPLICATION FOR IMPLEMENTATION OF  
ORDER PASSED BY THIS HONOURABLE  
TRIBUNAL DATED 22-07-2022 IN SERVICE  
APPEAL NO. 351/2014.**

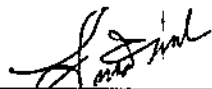
**AFFIDAVIT**

I, Sultan Mehmood S/o Fida Muhammad resident of Gulfam Town, Mian-de-Seri, Tehsil and District, Abbottabad, do hereby solemnly affirm and declare on oath that the contents of the above titled Application for implementation of order dated 22-07-2022 are true and correct to the best of my knowledge and belief.

Dated: 20-12-2022

A circular stamp with the text "ADVOCATE MIAN GHOUS GALIB" and "PESHAWAR" around the perimeter. The name "MIAN GHOUS GALIB" is written across the center. There are handwritten initials and the date "21/12/22" over the stamp.

Deponent \_\_\_\_\_

A handwritten signature in black ink, appearing to be "Sultan Mehmood", written over a horizontal line.

ANNEXURE A

(6)

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(2)

(2)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR.

Service Appeal No. 351/of 2014.

Sullan Mehmood, Acting Deputy Ranger, (now retired)

Garhi Habib Ullah Forest Range,

Kaghan Forest Division, Garhi Habib Ullah.... Appellant

VERSUS

1. Province of Khyber Pakhtunkhwa through  
Secretary Environment Department, Peshawar.
2. Chief Conservator of Forests, Central Southern  
Forests Region, Khyber Pakhtunkhwa, Peshawar.
3. Chief Conservator of Forests, Northern Forest  
Region-II, Abbottabad.
4. Conservator of Forest/Project Director,  
Watershed Management Circle, Abbottabad....  
Respondents

-----  
AMENDED APPEAL UNDER SECTION 4 OF  
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
ACT 1974 AGAINST THE IMPUGNED FINAL ORDER  
DATED 03-01-2014 RECEIVED/COMMUNICATED TO  
THE APPELLANT ON 23-02-2014, WHEREBY HIS  
DEPARTMENTAL APPEAL FOR CONFIRMATION AS  
DEPUTY RANGER HAS BEEN REJECTED BY  
RESPONDENT NO. 2, WITHOUT ANY REASON,  
DISREGARD OF THE RULES.  
-----



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Respectfully Sheweth:

FACTS OF THE CASE

1. That the appellant has filed the above titled appeal before this Honourable Tribunal, the same was matured for arguments however, during course of arguments, this Honourable Tribunal was of the view that the appellant may file an amended appeal, so the development carried out/occurred in case of the appellant during the pendency of the above titled appeal, particularly the factum of an inquiry, which was conducted by the Respondents, in result of which although the services of the appellant were regularized as Deputy Ranger but with immediate effect i.e. 18-07-2014 instead of 08-10-2013 thus, the grievance of the appellant to the extent of regularization of service as Deputy Ranger was redressed however, the appellant kept still illegally deprived from his promotion as Deputy Ranger since 08-10-2013, which also further effected the promotion of the appellant from Deputy Ranger BPS-12 to the post of Forest Ranger BPS-16 on regular basis. (Copies of the Inquiry Report and that of the Office Order No. 85, dated 12-01-2018 are appended as "A&B").

(8)

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2. That the relevant brief facts of the case are as under:-
3. That the appellant is a regular member of Provincial Civil Service of Forest Department and presently serving as Deputy Ranger on Acting Charge Basis.
4. That on 18-12-2009 the appellant alongwith others was promoted as Deputy Ranger in BPS-9 on Acting Charge Basis on the recommendation of Departmental Promotion Committee. (Annex: C).
5. That the appellant completed his probation period successfully to the entire satisfaction of his superiors and no cause of complaint was ever reported against him.
6. That the appellant is entitled for confirmation against the post of Deputy Ranger, but due to lukewarm procedure of the department, he was not confirmed against the post of Deputy Ranger and kept on Acting Charge Basis till 18-07-2014.
7. That is astonishing that the department adopted the policy of pick and choose and passed the confirmation order of one Mr. Muhammad Hanif (Deputy Ranger) who is far junior to the appellant. According to the seniority lists circulated from time to time, it is crystal clear that Mr. Muhammad Hanif

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is junior to appellant and both were promoted as Deputy Range on Acting Charge Basis in the same order dated 18-12-2009, but the appellant has been ignored while his junior colleague Mr. Muhammad Hanif was confirmed against the post of Deputy Ranger, thus the conduct of Respondents is not above board rather discriminatory and against the principles of seniority. (Annex: D,E &F).

8. That feeling aggrieved the appellant filed his departmental appeal for confirmation/regularization against the post of Deputy Ranger dated 28-10-2013, but to his utter dismay that his departmental appeal has been rejected by Respondent No. 2 vide order dated 03-02-2014. (Annex: G & H).

9. That as per rules persons appointed to posts by initial recruitment promotion or transfer shall be on probation for a period of one year. The appointing authority, if considers necessary may extend the probation period for one year as may be specified at the time appointment. If no order is issued on the expiry of the extended period of probation, the period of probation shall be deemed to have been successfully completed. The appellant has already completed his probation period successfully and

(10)

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(6) (6)

there existed nothing against him and it is the apathy and negligence of the department that they failed to pass the confirmation order of the appellant and the appellant is not supposed to suffer for inaction or omission of the department. (Annex: I).

10. That clear vacancies were available against which the appellant could be confirmed as it is evident that Mr. Muhammad Hanif who was junior to appellant, but he has already been confirmed, while the same benefit is being denied to the appellant and he has not been treated in accordance with law.

In view of the aforesaid facts and circumstances of the case it is humbly prayed that the impugned order dated 03-01-2014 received/communicated to the appellant on 23-02-2014 may kindly be set aside, being illegal and void, directing the Respondents to issue/pass regularization/confirmation order of the appellant against the post of Deputy Ranger from the date when his juniors were confirmed against the said post i.e. 08-10-2013.

~~18-12-09~~  
Any other relief though not specifically asked for to which the appellant is found entitled in the

(11)

(7) (7)

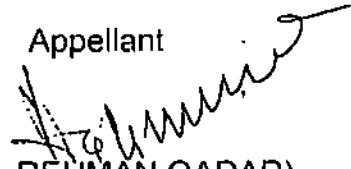
circumstances of the case may also be granted to the appellant.



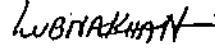
Appellant

Dated: 15-01-2019.

Through:



(ABDUL REHMAN QADAR)  
Advocate Supreme Court of Pakistan  
at Haripur.



(LUBNA KHAN)  
Advocate High Court  
at Abbottabad:

ANNEXURE B

(12)

OFFICE OF THE CHIEF CONSERVATOR OF FORESTS  
KHYBER PAKHTUNKHWA PESHAWAR

(9)

Annexure A to B

**ENQUIRY REPORT ON THE APPEAL OF MR. SULTAN MEHMOOD DEPUTY RANGER DATED 20.03.2017 PREFERRED BEFORE CCF-I**

In pursuance of appeal preferred by Mr. Sultan Mehmood Deputy Ranger Watershed Circle the Chief Conservator of Forests Central Southern Forest Region-I, constituted a committee consisting of the following to thrash out the case and report.

- |   |          |
|---|----------|
| 1. Mr. Javed Arshad<br>Conservator of Forests<br>Watershed Management Circle    | Chairman |
| 2. Qazi Muhammad Younis<br>Conservator of Forests<br>Upper Hazara Forest Circle | Member.  |
| 3. Mr. Zahoor Jan<br>Senior Clerk Office of CCF-I, Peshawar                     | Member   |

The committee held its meeting on 18.05.2017 and thrash out the relevant record which concludes that:  
According to the seniority list of Watershed Management Circle stood on 28-02-2009, the seniority position is as under:

Name of official
Mr. Sultan Mehmood at Sl. No.2
Mr. Zareen Gul at Sl. No.16

1. Similarly according to the combined seniority list of Forester of Abbottabad Circle and Watershed Circle as stood on 31-03-2009, circulated by Conservator of Forests Hazara No.2058-67/GE dated 11-04-2009, the appellant is falling in the seniority list as under:

Name of official
Mr. Sultan Mehmood at Sl. No.11
Mr. Zareen Gul at Sl. No.51

In the meeting of Departmental Promotion Committee held under the Chairmanship of Chief Conservator of Forests NWFP on 24-11-2009, the promotion of Forester to the rank of Deputy Ranger on acting charge basis was recommended through minutes of meeting on the basis of seniority/cum-fitness as well as on merit quota as under:

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Abdul  
Sc- 5620

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S. No.	Name of Forester	Date of appointment in present grade as Forester	Recommendation
1	Mr. Muhammad Iqbal S/O Jalal Khan	15-06-1977	The Forester was appointed as Deputy Ranger on acting charge basis with effect from 28-04-2008, therefore the DPC recommended him for regular promotion to the rank of Deputy Ranger
2	Mr. Manzoor Ahmed	24-06-1977	The Forester was appointed as Deputy Ranger on acting charge basis with effect from 28-04-2008, therefore the DPC recommended him for regular promotion to the rank of Deputy Ranger
3	Syed Mubin Shah	24-06-1977	The Forester was appointed as Deputy Ranger on acting charge basis with effect from 28-04-2008, therefore the DPC recommended him for regular promotion to the rank of Deputy Ranger
4	Mr. Javed Sultan	10-08-1977	Due to recovery of Rs.385896/45 on a/c of shortage of Food Commodities and appeal of the Forester is under trial in Supreme Court of Pakistan the DPC deferred the case of Forester concerned.
5	Mr. Sultan Khan	21-08-1978	Recommended for appointment to the post of Deputy Ranger on acting charge basis.
6	Mr. Muhammad Maqbool	22-08-1978	The Forester is under investigation with NAB authorities therefore the DPC deferred the case of the Forester concerned.
7	Mr. Muhammad Iqbal S/O Gohar Rehman	06-08-1978	Recommended for appointment to the post of Deputy Ranger on acting charge basis.
8	Mr. Sultan Mehmood	26-08-1978 ✓	Recommended for appointment to the post of Deputy Ranger on acting charge basis.
9	Mr. Muhammad Hanif	28-08-1978 ✓	Recommended for appointment to the post of Deputy Ranger on acting charge basis.
10	Mr. Zareen Gul	18-03-1985 ✓	Recommended for appointment to the post of Deputy Ranger on acting charge basis against merit quota.
11	Mr. Muhammad Riasat	01-10-1986	Recommended for appointment to the post of Deputy Ranger on acting charge basis against merit quota.

The promotion order of the appellant was issued on seniority Cum-fitness and official at S. No. 10 against merit quota vide Conservator of Forests Abbottabad Circle office order No.91 dated 18-12-2009, as under:

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S. No.	Name of Forester	Present posting
1	Mr. Sultan Khan S/O Umer Khan	Upper Kohistan Forest Division Dassu
2	Mr. Muhammad Iqbal S/O Gohar Rehman	Kunhar Watershed Division Mansehra
3	Mr. Sultan Mehmood S/O Fida Muhammad	Unhar Watershed Division Mansehra
4	Mr. Muhammad Hanif S/O Muhammad Qasim	Kaghan Forest Division Garhi Habibullah
5	Mr. Zareen Gul S/O Said Kamal Shah (against merit quota)	Buner Watershed Division Swari

As per promotion order Mr. Sultan Mehmood is falling at S. No.3 where as Mr. Zareen Gul at S. No.5 i.e junior than the appellant.

In view of the Government Notification No.SO (Estt) ENVT/10-4/2K11 dated 05.10.2012, regarding constitution/revision of Circle and maintenance of seniority list on Circle basis the above Deputy Rangers working on acting charge basis were recommended for promotion on regular basis vide Conservator of Forests Watershed No.2317/E dated 25-02-2013, alongwith working paper as under:

S. No.	Name	Rank
1	Mr. Sarfraz Khan	D/Ranger
2	Mr. Masoodur Rehman	D/Ranger
3	Mr. Zareen Gul	D/Ranger
4	Mr. Sultan Mehmood	D/Ranger
5	Mr. Shabir Ahmed	Forester
6	Mr. Muhammad Nazir	Forester
7	Mr. Muhammad Sharif	Forester

In the above working papers/recommendation the seniority of the appellant was erroneously disturbed and being senior most was kept one step junior than the official at Sl. No.3. By virtue of above working paper/recommendation meeting of Departmental Promotion Committee was held on 30-09-2013, under the Chairmanship of Chief Conservator of Forests Central Southern Forest Region-I, and recommended promotion of the Foresters including Mr. Zareen Gul on regular basis where as the name of appellant is all the more found omitted from the DPC proceedings. (copy enclosed)

In view of above recommendation the Conservator of Forests Watershed issued order No.12 dated 08-10-2013, regarding regularization of the Deputy Ranger pertaining to Watershed Circle as under:

S. No	Name
1	Mr. Masood-ur-Rehman
2	Mr. Zareen Gul

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The appellant was remained on acting charge basis when Departmental Promotion Committee was held on 10.06.2014 recommended promotion of Deputy Ranger on regular basis (copy enclosed) and accordingly his promotion order was issued by Conservator of Forests Watershed Circlewide order No.3 dated 18.07.2014.

The recommendation in the working paper and proceedings of DPC dated 30.09.2013, has intentionally or inadvertently by passed the promotion of appellant whereas the other officials alleged in the appeal have got promotion to the rank of Forest Rangers.

The promotion cases also delayed due to the reason that the DPC could not held their meeting since 2009-2013 because of persistent pressure/agitation from the President of F/Guards, Foresters and D/Rangers association regarding bifurcating of Circles and non acceptance of the integrated seniority list.

Recommendation

1. Since the appellant has deprived from the legal right of timely promotion/seniority hence the committee recommend restoration of the seniority in the cadre of D/Ranger from the date of promotion order No.12 dated 8.10.2013 with consideration of case for further promotion as Forest Ranger subject to condition that the appellant shall withdraw his case/appeal from the Court of Khyber Pakhtunkhwa Service Tribunal.

Qazi Muhammad Younis  
Conservator of Forests  
Upper Hazara Forest Circle  
Mansehra (Member)

Mr. Zahoor Jan  
Senior Clerk office of  
Chief Conservator of Forests  
Central Southern Forest Region-I,  
Peshawar (Member)

Mr. Javed Arshad  
Conservator of Forests  
Watershed Management Circle  
Abbottabad (Chairman)

8

ANNEXURE C

16

To,

Chief Conservator of Forests,  
Central Southern Forest Region Peshawar.

Subject: Appeal prefer by Mr. Sultan Mehmood the Then Deputy Ranger Vide Service Appeal No 351 of 2014.

Sir,

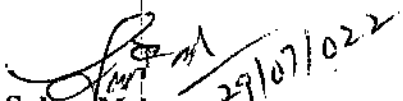
In pursuance of your office order No 93 dated 05-05-2017 and recommendation of committee regarding grant of seniority to the appellant submitted vide Conservator of Forests Water Shed Abbottabad (Chairman) of Committee letter No 5313/E dated 18-05-2017, the KP Service Tribunal vide order dated 22-07-2022 has also disposed off the appeal with same direction to grant the seniority.

Meanwhile in view of the recommendation made by Committee The Chief Conservator of Forests Central Southern Forest Region Peshawar very kindly restored the Seniority of applicant vide his order No 06 Dated 05-07-2017, but unfortunately the order could not be implemented as neither placed in the seniority list at proper place i.e below Mr. Gul Zaman and above Mr. Zareen Gul the then Deputy Ranger nor fix the pay etc.

It is therefore requested that my seniority may kindly restored as a Deputy Ranger with effect from 08-10-2013 and promotion of Forest Ranger w.e.f 14-11-2016 to consider at par with the promotion of my Juniors vide order No 38 of even date and obliged.

Photocopy of relevant documents are enclosed.

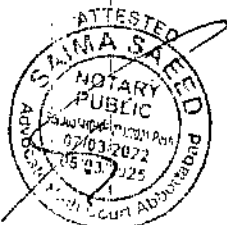
Your's Faithfully,

  
Sultan Mehmood  
Forest Ranger (Retired)  
C/O SS General Store Mia Di Seri  
Near APS Abbottabad.

Copy forwarded to ...

1. Section Officer Establishment Secretary to Government of Environment Department Peshawar.
2. Chief Conservator of Forest, Northern Forest Region-II Abbottabad.
3. Conservator of Forest/Project Director Watershed Management Circle Abbottabad.

Sultan Mehmood  
Forest Ranger (Retired)



20/12/22

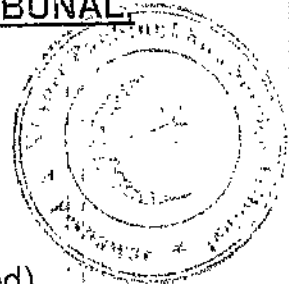
ANNEXURE D

(17)

(2)

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

Service Appeal No. 351/of 2014.



Sultan Mehmood, Acting Deputy Ranger, (now retired)

Garhi Habib Ullah Forest Range,

Kaghan Forest Division, Garhi Habib Ullah.... **Appellant**

**VERSUS**


1. Province of Khyber Pakhtunkhwa through Secretary Environment Department, Peshawar.
  - ✓ 2. Chief Conservator of Forests, Central Southern Forests Region, Khyber Pakhtunkhwa, Peshawar.
  - ✓ 3. Chief Conservator of Forests, Northern Forest Region-II, Abbottabad.
  - ✓ 4. Conservator of Forest/Project Director, Watershed Management Circle, Abbottabad....
- Respondents**

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AMENDED APPEAL UNDER SECTION 4 OF  
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
ACT 1974 AGAINST THE IMPUGNED FINAL ORDER  
DATED 03-01-2014 RECEIVED/COMMUNICATED TO  
THE APPELLANT ON 23-02-2014, WHEREBY HIS  
DEPARTMENTAL APPEAL FOR CONFIRMATION AS  
DEPUTY RANGER HAS BEEN REJECTED BY  
RESPONDENT NO. 2, WITHOUT ANY REASON,  
DISREGARD OF THE RULES.

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*Certified to be true copy*

  
Chairman  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar.

Appeal No. 351/2014  
Sultan Mahmood vs Govt (18)

22<sup>nd</sup> July 2022 1. Counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present.



2. Learned counsel for the appellant referred to the last para of the enquiry report dated 20.03.2017 whereby the desired relief was to be granted to the appellant with the condition that the appellant would withdraw the appeal from the Tribunal. Learned counsel for the appellant further submitted that conditional order was also passed in his favour but this appeal was a hurdle to give effect to his due right. He submitted that the appeal might be disposed of so that the appellant could get his rights. Disposed of accordingly. Consign.

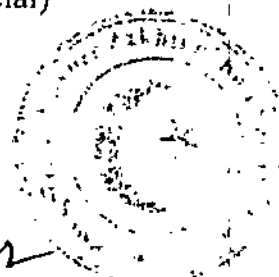
3. Pronounced in open court in Camp Court Abbottabad and given under our hands and seal of the Tribunal on this 22<sup>nd</sup> day of July, 2022.

*(Signature)*

(Safah Uddin)  
Member(Judicial)

*(Signature)*

(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad



Certified to be true copy

*(Signature)*  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Date of Presentation of Application 25/7/22  
Number of Pages 806  
Copying Fee 40/-  
Urgent 41/-  
Total 74/-  
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CHIEF CONSERVATOR OF FORESTS  
CENTRAL SOUTHERN FOREST REGION-I  
KHYBER PAKHTUNKHWA

(HAD)

No. 2997 /E



SHAMI ROAD PESHAWAR  
Ph: 92 91 0212177, Fax: 92 91  
0211478

E-mail:

ccfforest@pesh.comail.gard

Dated 18 / 11 / 2022

The Chief Conservator of Forests  
Northern Region-II, Abbottabad

Subject: - APPEAL PREFERRED BY MR. SULTAN MEHMOOD THE THEN  
DEPUTY RANGER VIDE SERVICE APPEAL NO.351 OF 2014

Memo:- Reference your letter No. 2963/E, dated 30/09/2022

As already informed vide this office letter No. 998/E, dated 23/08/2022, seniority in the cadre of Deputy Ranger has since been restored w.e.f 08/10/2013 vide this office order No.06, dated 05/07/2017 with the condition that the Deputy Ranger shall withdraw his service appeal from Khyber Pakhtunkhwa Service Tribunal Peshawar, hence the present appeal is hereby rejected.

You are therefore requested to inform the Ex-Forest Ranger accordingly and suit mit his pension case for further course of action.

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

No. 2998 /E,

Copy forwarded to Mr. Sultan Mehmood, Forest Ranger (retired) C/O SS General Store Mia Di Seri near APS Abbottabad for information.

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

Received from  
Peshawar.  
Date: 29/12/2022  
Jawad Ali

HCBA Reg No.

BC No.

Place of Practice

Name of Advocate

19

*[Signature]*  
 APPOINTED  
 Final Secretary  
 High Court Bar Association  
 Abbottabad



S. No. 29277

19

### وکالت نامہ

بعدالت: جناب سر جسٹس ٹریبونل ایف بی ایچ ڈی سوات

عنوان: سلطان محمود نام: ڈی ڈی منٹ

منجانب: سید رشید نوعیت مقدمہ: اسل

باعث تحریر آئندہ:

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جوابدہی برائے پیشی یا تصفیہ مقدمہ بمقام: \_\_\_\_\_ کے لیے

عبد الرحمن قادر ایڈووکیٹ سید محمد رفیق ایڈووکیٹ

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا اور بروقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہونگے نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہونگے اور مقدمہ پکھری کے علاوہ کسی اور جگہ سماعت ہونے یا بروز تعطیل یا پکھری کے اوقات سے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا عائد کرنے کے واجب نہیں ہونگے۔ مجھ کو کل ساختہ پر ساختہ صاحب موصوف مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر ثانی و راضی نامہ و فیصلہ بر حلف کرنے سے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے تیر و نجات از پکھری صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا طرفہ درخواست حکم امتناعی یا ترقی یا گرفتاری یا گرفتاری و اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا ہونے علیحدہ مختانہ پیروی کا اختیار ہوگا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار حاصل ہوگا کہ مقدمہ مذکور یا اس کے کسی جزو کی کارروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہونگے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ التوا پڑے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

مورخ: 22-12-2024  
 دن مہینہ سال  
 لہذا وکالت نامہ لکھ دیا ہے کہ سندر ہے۔  
 مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

نوٹ: اس وکالت نامہ کی ذمہ داری ناقابل قبول ہوگی۔

*[Signature]*  
 Asad  
 Asad

*[Signature]*  
 (HASSAN QADIR KHAN)  
 Barrister at law.