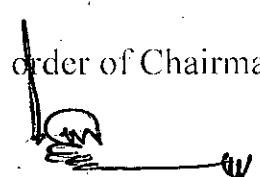


FORM OF ORDER SHEET

Court of _____

Case No. - 1914/2022


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/12/2022	<p>The appeal of Mr. Muhammad Saeed resubmitted today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

The appeal of Mr. Muhammad Saeed son of Sadbar Khan Forest Guard Dargai Forest Sub Division, Dargai District Malakand received today i.e. on 18.11.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- index of the appeal may be prepared according to rules.
- 2- Check list is not attached with the appeal.
- 3- Appeal has not been flagged/marked with annexures marks.
- 4- Annexures of the appeal may be attested.
- 5- Affidavit may be got attested by the Oath Commissioner.
- 6- Annexures-A, B, F & G of the appeal are missing.
- ⑦ Copy of departmental appeal against the impugned seniority list is not attached with the appeal, annexure-I is an application for grant of seniority from his initial appointment but not a departmental appeal because impugned seniority list was notified on 06/07/2022 and the alleged departmental appeal was made on 04.7.2022 much before circulating the impugned seniority list meaning thereby that there is no departmental appeal against the impugned seniority list.
- 8- Twelve more copies/sets of the appeal along with annexures i.e complete in all respect may also be submitted with the appeal.

No 3258 /S.T,

Dt. 21/11 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

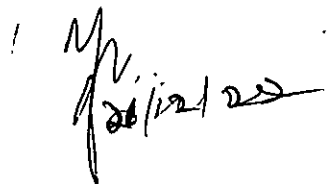
Mr. Noor Muhammad Khattak Adv. Pesh.

R/Sir,

In response to objection 1-6, objections has properly been removed.

In response to objection No. 7, Date of seniority list inadvertently mentioned as 06/7/22 while the correct date of seniority list 04/7/22 against which the appellant filed departmental appeal filed on 04/7/22, hence resubmitted.

In response to objection No. 8, 12 spare copies has been attached with the service appeal.


21/11/22

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL No. 1914 /2022

MUHAMMAD SAEED

VS FOREST DEPTT:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal with Affidavit	1-4
2.	Copy of CNIC	A	5
3.	Copy of appointment order	B	6-7
4.	Copy of termination order	C	8
5.	Copy of order	D	9
6.	Copy of transfer order dated 30-01-2012	E	10
7.	Copy of order dated 21-02-2018	F	11
8.	Copy of Seniority list	G	12-13
9.	Copy of departmental appeal	H	14
10.	Vakalatnama		15


APPELLANT

Through:


NOOR MOHAMMAD KHATTAK
ADVOCATE
SUPREME COURT OF PAKISTAN

-1-

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

SERVICE APPEAL NO. 1914 /2022

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1971

Dated 18-11-2022

Mr. Muhammad Saeed S/o Sadbar Khan Forest Guard, Dargai Forest Sub
Division, Dargai District Malakand.....**APPELLANT**

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary to Government of Khyber Pakhtunkhwa Forest Department, Peshawar.
- 3- The Chief Conservator of forest, Khyber Pakhtunkhwa, Peshawar.
- 4- The conservator of Forest, Malakand Circle Swat.
- 5- The Divisional forest Officer, Malakand at Batkhela.
- 6- Khurshid Ahmed S/o Qazi Saleh Muhammad, Forest Guard, Dargai Forest Sub Division, Dargai District Malakand.
- 7- Zain Ul Abideen S/o Sultan Mehmood, Forest Guard, Batkhela Forest Sub Division, Batkhela District Malakand.
- 8- Javid Akhtar S/o Akhtar Muhammad, Forest Guard, Batkhela Forest Sub Division, Batkhela District Malakand.
- 9- Naseer Hassan Mian S/o Said Akbar Mian, Forest Guard, Batkhela Forest Sub Division, Batkhela District Malakand.
- 10- Said Muhammad S/o Ghulam Muhammad, Forest Guard, Dargai Forest Sub Division, Dargai District Malakand.

Filed to-day

Registrar

18/11/22

.....**RESPONDENTS**

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED SENIORITY LIST NOTIFIED BY THE RESPONDENTS VIDE LETTER DATED 01/7/2022 VIDE WHICH THE SENIORS OF THE APPELLANT WERE MADE SENIOR TO THE APPELLANT WHILE THE APPELLANT WAS PLACED AT S.NO.10 OF THE SENIORITY LIST AND INACTION OF THE RESPONDENTS BY NOT CONSIDERING THE APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINTY DAYS .ANY OTHER REMEDY WHICH THIS AUGUST SERVICE TRIBUNAL DEEMS FIT THAT MAY ALSO BE AWARDED IN FAVOR OF THE APPELLANT.

R/SHEWETH:

Brief facts giving rise to the instant service appeal are as under:-

- 1- That the appellant is bonafide resident of District Malakand and a law abiding citizen of Pakistan. **Copy of CNIC is attached as Annexure.....A.**
- 2- That appellant is serving as Forest Guard in Dargai forest sub Division Dargai District Malakand.
- 3- That prior to the present posting, on 08-10-1992 the appellant was appointed as Forest Guard in the Social Forestry Project Swat. **Copy of appointment order is attached as Annexure.....B.**
- 4- That later on, in the year 1998 the appellant was declared surplus and was terminated from service. **Copy of termination order is attached as Annexure.....C.**
- 5- That in the year 2010 the in compliance with the order and judgment of the Hon'able Service Tribunal Khyber Pakhtunkhwa and advice of the Conservator Forestry Planning and Monitoring Circle Peshawar, the appellant was reinstated in service , however, his intervening period was treated as extra ordinary leave without pay. **Copy of order is attached as Annexure.....D.**
- 6- That in the year 2012 the appellant was transferred from the working Plan Unit-III Peshawar to Demarcation Forest division Swat. **Copy of of transfer order dated 30-01-2012 is attached as annexure.....E**
- 7- That subsequently the appellant has been transferred from the Demarcation Forest Divison Swat to to Malakand Forest Division Batkela. **Copy of order dated 21-02-2018 is attached as Annexure.....F.**
- 8- That since appointment, the appellant is serving with zeal and devotion and to the entire satisfaction of the superiors and no complaint has ever been noticed.

- 9- That the respondents has issued a seniority list of the Forest guards stood on 01-07-2022 whereby the appellant has been placed at S.No.10 of the seniority while juniors to the appellant have been made senior to the appellant. **Copy of seniority listed dated 01/07/2022 is attached as annexure.....G.**
- 10- That being aggrieved from the impugned order of the respondents the appellant preferred a departmental appeal, however, no response has been received within the statutory period of ninety days. **Copy of departmental appeal is attached as Annexure.....H**
- 11- That the petitioner after being highly aggrieved for the inaction of the respondents having no other adequate remedy files the instant appeal on the grounds interalia as under:-

GRUNDS:

- A- That the inaction of the respondent department is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside to the extent of serial No.6.
- B- That appellant has not been treated in accordance with law and rules by the respondent department 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 inaction of the respondent department is based on discrimination, favoritism and nepotism, hence not tenable in the eye of law.
- D- That despite the fact the appellant is most senior in the seniority list, even then the appellant has been discriminated which is against service rules.
- E- That non placing of name of the appellant at the right and due place of the seniority is tantamount to disparity and discrimination under the Constitution of the Islamic Republic of Pakistan, 1973.
- F- The action and inaction of the respondents is against the Section 17 of the Appointment, Transfer and Promotion Rules, 1989 and Section 8 of the Civil Servants Act, 1973.


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



It is therefore, most humbly prayed that on acceptance of this appeal the impugned Seniority List dated 01-07-2022 may kindly be rectified/modified to the extent of appellant and Private respondents by placing the appellant at the right position of the Seniority List. Any other remedy which this august service Tribunal deems fit that may also be awarded in favor of the appellant.

Dated. 03/11/22

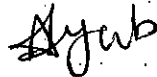

APPELLANT
MUHAMMAD SAEED

THROUGH:


NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT


UMAR FAROOQ

WALEED ADNAN

&


M. AYUB
ADVOCATES

AFFIDAVIT

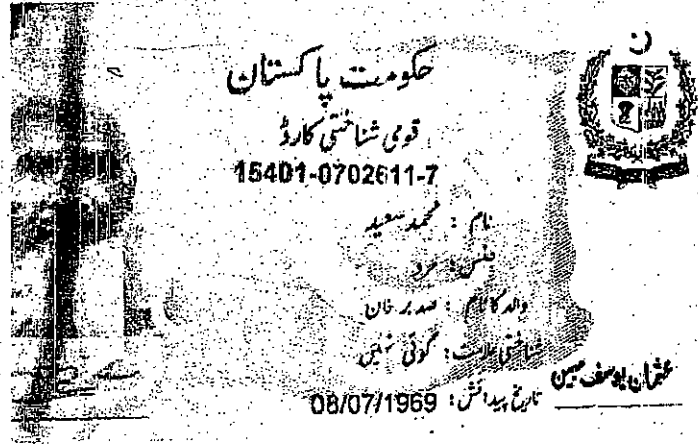
I Muhammad Saeed S/o Sadbar Khan Forest Guard, Dargai Forest Sub Division, Dargai District Malakand, do hereby solemnly affirm that the contents of this Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.


DEPONENT

"A" - 5 -

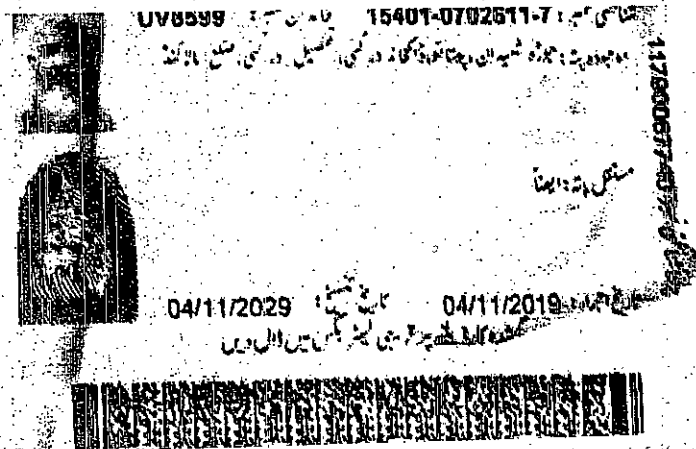
حکومت پاکستان
قومی شناختی کارڈ
15401-0702611-7

نام: محمد سعید
پتو: سندھ
والد کا نام: صدر خان
شناختی ادارت: کوئی نہیں
عشمان یوسف مین
تاریخ پیدائش: 08/07/1969



15401-0702611-7-7
1178067407

04/11/2029
04/11/2019



"B" 23 110 -6-

OFFICE ORDER NO. 33 DATED SAIDU SHARIF THE: 08 TH OCTOBER, 1992
ISSUED BY DR. NASIM JAVED DFO/PROJECT DIRECTOR SOCIAL FORESTRY
PROJECT MALAKAND DIR AT SAIDU SHARIF.

Consequent upon the recommendation of Departmental Selections Committee constituted vide Project Director Malakand Social Forestry Project office order No. 24 sated 20/9/1992, the following persons are hereby appointed as Forest Guards against the existing vacancies in Malakand Social Forestry Project in B.P.S. No. 2 (945-32-1425) with usual allowances as admissible under the rules.

1. Mr. Jafar Akram s/o Noor Hawas Khan of Agra Mkd: Agency.
2. Mohammad Saeed s/o Sadbar Khan of Pitao Mkd: Agency
3. Hidayatullah s/o Fasal Rahman of Malakand Agency
4. Mohammad Irshad s/o Abdur Rashid of Sakhakot Mkd: Agency
5. Shamsul Wahab s/o Zarawar Khan of Khar Mkd: Agency.
6. Aurangzeb s/o Ahmad Khan of Jaban Mkd: Agency.
7. Noor Mohammad s/o Ahmad Khan, of Jalala Malakand Agency.

The appointments are subject to the following conditions:

The posts are purely temporary and shall be liable to termination on the expiry of the project period. Their services can also be terminated at any time during the project period with one month's notice or on the payment of one month's salary in lieu of the notice. If the incumbent intends to resign, he shall serve the department with one month's notice or remit an amount equal to his one month's salary.

He shall remain on probation for a period of two years further extendable by one year during which his services can be terminated if he failed to perform his duties to the satisfaction of the appointing authority.

He shall be governed by such rules and regulations as are applicable to the class of service to which he belongs.

He shall produce the following documents:

- 1) Medical fitness certificate from the Civil Surgeon of Civil Hospital Bathkela.
- 2) Domicile certificate.
- 3) Character certificate from two responsible persons not being the relatives of the candidates duly countersigned by the Political Agent Malakand Agency.
- 4) He will have to join the duty at his own cost.

BETTER COPY: 6

OFFICE ORDER NO.33 DATED SAIDU SHARIF TE 08TH OCTOBER, 1992 ISSUED BY DR. NASIN JAVED DFO/PROJECT DIRECTOR SOCIAL FORESTRY PROJECT MALAKAND DIR AT SAIDU SHARIF.

Consequent upon the recommendation of Departmental Selection Committee constituted vide order No.24 dated 20/09/1992, the following persons are hereby appointed as Forestry Guards against the existing vacancies in Malakand Social Forestry Project in B.P.S No.2 (945-32-1425) with usual allowance as admissible under the rules.

1. Mr. Jafar Akram s/o Noor Hawas Khan of Agra Malakand Agency.
2. Muhammad Saeed s/o Sadbar Khan of Pitao Malakand Agency.
3. Hidayatullah s/o Fazal Rahsan of Malakand Agency.
4. Muhammad Irshad s/o Abdur Rashid of Sakhakot Malakand Agency.
5. Shamsul Wahab s/o Zarawar Khan of Khar Malakand Agency.
6. Aurangzeb s/o Ahmad Khan of Jaban Malakand Agency.
7. Noor Muhammad s/o Ahmad Khan, of Jalala Malakand Agency.

The appointments are subject to the following conditions:

The posts are purely temporary and shall be liable to termination on the expiry of the project period. Their services can also be terminated at any time during the project period with one month's notice or on the payment of one month's salary in lieu of the notice. If the incumbent intends to resign. He shall serve the department with one month's notice or remit an amount equal to one month's salary.

He shall remain on probation for a period of two years further extendable by one year during which his services can be terminated if he failed to perform his duties to the satisfaction of the appointing authority.

He shall be governed by such rules and regulations as are applicable to the class of service to which he belongs.

He shall produce the following documents:

1. Medical fitness certificate from the Civil Surgeon of Civil Hospital Batkhela.
2. Domicile certificate.
3. Character certificate from two responsible persons not being the relatives of the candidates duly countersigned by the Political Agent Malakand Agency.
4. He shall have to join duty at his own cost.

-7-

If he fails to accept the offer and report the arrival for duty within ten days of the receipt of this letter, the offer shall stand cancelled.

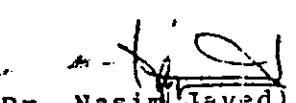
Sd/-
(Dr. Nasim Javed)
DFO/Project Director
Social Forestry Project Hkd: Dir
Saidu Sharif

No. 1102-9 /SF,

Copy forwarded to the:

- 1) Chief Conservator of Forests, (North) at Peshawar for favour of information.
- 2) Conservator of Forests, Malakand Circle Mingora for favour of information.
- 3) All concerned for information and necessary action.
- 4) Head Clerk/Divisional Accountant for information and necessary action.

Personal files for record.


(Dr. Nasim Javed)
DFO/Project Director
Social Forestry Project Hkd: Dir
Saidu Sharif.

- 8 - C 24

OFFICE OF THE DIVISIONAL FOREST OFFICER, SOCIAL FORESTRY DIVISION,
MALAKAND.

To:

Mr. Muhammad Ali Khan

No: 437 /MSF, dated Batkhela, 23.12.1997.

Subject: SERVICE TERMINATION ORDER

Ref: this office letter No. 437 dated 30.12.1997.

.....

It is regretted that your services already declared surplus as per Briding Period PC-I of the Social Forestry Project for the year 1997-98, are hereby terminated with effect from 31.1.1998 (A.N.).

.....

Divisional Forest Officer,
Social Forestry Division,
Malakand.

NO: /MSF,

Copy in continuation of this office letter endst: No. 437 dated 30.12.1997 is forwarded to:

1. The Chief Conservator of Forests, Social Forestry, NWFP Peshawar for favour of information please.
2. The PD/Conservator of Forests, Malakand Social Forestry Circle, at Saidu-Sharif for favour of information please
3. Personal file for record
4. Divisional Head Clerk, for information and necessary action.

Divisional Forest Officer,
Social Forestry Division,
Malakand at Batkhela.

BETTER COPY:

**OFFICE OF THE DIVISIONAL FOREST OFFICER, SOCIAL FORESTRY SERVICES
MALAKANDS.**

To

Mr. Muhammad Saeed

No: 457/MSF,

Dated Batkhela, 28.1.1998.

Subject:

SERVICE TERMINATION ORDER

Ref: this office letter No.339/Mst dated 30.12.1997

It is regretted that your services already declared surplus as per Briding
Period PC-I at the Social Forestry Project for the year 1997-98, are hereby terminated with effect
from 31.1.1998 (A.N).

**Divisional Forest Officer,
Social Forestry Division,
Malakand**

"D" 9-

OFFICE ORDER NO. 3 DATED PESHAWAR 24/02/2011
ISSUED BY QAZI SHABIR AHMAD DIVISIONAL FOREST OFFICER WORKING
PLAN UNIT-III-PESHAWAR.

As per decision made by the Service Tribunal Peshawar in appeal No.443 dated 4.02.2010, under section 4 of the Service Tribunal Act 1974, and as advised by Conservator of Forests Forestry Planning & Monitoring Circle Peshawar vide his letter No. 2677/E dated 21.2.2011, Mr. Muhammad Saeed Ex - Forest Guard of defunct Malakand Social Forestry Project is hereby adjusted against the vacant post of Forest Guard with effect from the date of arrival for duty.

The intervening period from the date of his termination till his arrival for duty is hereby treated as extra ordinary leave without pay.

Sd/-

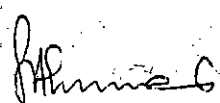
(QAZI SHABIR AHMAD)
Divisional Forest Officer
Working Plan unit-III,
Peshawar.

No. 242-44/WP-III

Dated 24/02/2011.

Copy forwarded to the

1. Chief Conservator of Forests Khyber Pakhtunkhwa Peshawar for favour of information please.
2. Conservator of Forest Forestry Planning & Monitoring Circle Peshawar for information with reference to his letter No.2677/E dated 21.02.2011.
3. ✓ Muhammad Saeed S/O Sadbar Khan Ex- Forest Guard Malakand Social Forestry Batkhela.


Divisional Forest Officer
Working Plan unit-III,
Peshawar.

**GOVERNMENT OF PUNJAB
DEPARTMENT OF FORESTS
PESHAWAR**

UE

In order to adjust to their home districts to their home districts the following posting/transfer amongst the Forest Guards is hereby ordered in the interest of public service with immediate effect.

-10-

S. No.	Name of Forest Guard	From	To
1	Mr. Anwar Zeb	Working Plan Unit-IV Abbottabad	Demarcation Forest Division Swat Shagal
2	Mr. Aslam Khan	Demarcation Forest Division Swat Shagal	Working Plan Unit-IV Abbottabad
3	Mr. Bahadar	Working Plan Unit-III Peshawar	Demarcation Forest Division Swat Shagal
4	Mr. Aslam Zeb	Demarcation Forest Division Swat Shagal	Working Plan Unit-III Peshawar
5	Mr. Muhammad Saeed	Working Plan Unit-III Peshawar	Demarcation Forest Division Swat Shagal
6	Mr. Nowsharwan	Demarcation Forest Division Swat Shagal	Working Plan Unit-III Peshawar

Note: The Forest Guard listed at Sl. No. 2 substitute of Sl. No. 1 will work in Working Plan Unit-III at Peshawar on detachment basis and will draw his salary from Working Plan Unit-IV Abbottabad.

Sd/-
(Haider Ali Khan)
Chief Conservator of Forests-I
Khyber Pakhtunkhwa Peshawar

No. 263-65 /E

Copy forwarded for information and necessary action to the:

1. CF PESHAWAR Circle Peshawar.
2. CF Malakand East Circle Swat.
3. Regional Accountant (Head Office Peshawar).

[Signature]
Chief Conservator of Forests-I
Khyber Pakhtunkhwa Peshawar

[Signature]

No. 2352-88 /E

Date: Peshawar, 2/2/2012

Copy forwarded to Divisional Forest Officer Working Plan Unit-III Peshawar & Working Plan Unit-IV Abbottabad for information & necessary action.

[Signature]
Conservator of Forests
Forestry Planning & Monitoring Circle
Peshawar

No. 236-92

WP-III Dated Peshawar the 10/2/2012

1. Copy for information and necessary action forwarded to DFO Working Plan Unit-VI Swat.
2. Mr. Behrobar Forest Guard WP-III Peshawar.
3. Muhammad Saeed Forest Guard C/O DFO WP-VI Swat.

[Signature]
Divisional Forest Officer
Working Plan Unit-III
Peshawar.

BETTER COPY:

OFFICE ORDER NO. 107 DATED PESHAWAR THE 30/1/2012 ISSUED BY MR. HAMZA ALI KHAN CHIEF CONSERVATOR OF FORESTS KHYBER PAKHTUNKHWA PESHAWAR

The following posting/transfers amongst the Forest Guards is hereby ordered in the interest of public service with immediate effect:-

SNO	Name of Forest Guards	From	To
1	Mr. Anwar Zeb	Working Plan Unit-IV Abbottabad	Demarcation Forest Division Swat Shagai
2	Mr. Aslam Khan	Demarcation Forest Division Swat Shagai	Working Plan Unit-IV Abbottabad
4	Mr. Alamzeb	Demarcation Forest Division Swat Shagai	Working Plan Unit-III, Peshawar
5	Mr. Muhammad Saeed	Working Plan Unit-III Peshawar	Demarcation Forest Division Swat Shagai
6	Mr. Nowsherwan	Demarcation Forest Division Swat Shagai	Working Plan Unit-III Peshawar

NOTE:

The Forest Guard listed at Sr.No.2 substitute of Sr.No.1 will work in Working Plan Unit-III at Peshawar on detainment basis and will draw his salary from Working Plan Unit-IV Abbottabad.

Sd/-
(Haider Ali Khan)
Chief Conservator of Forests-1
Khyber Pakhtunkhwa Peshawar

No.2663-65/E

No.2798-99/E

Dated: 08/02.2012

Conservator of Forests
Forestry Planning &
Monitoring Circle Peshawar

No.230-32 dated 10/02/2012

Divisional Forest Officer
Working Plan Unit-III Peshawar

-11- "F"

175

OFFICE ORDER NO. 68 DATED SAIDU SHARIF THE: 21 /02/2018 BY MR. MUHAMMAD YOUSAF KHAN, CONSERVATOR OF FORESTS, MALAKAND CIRCLE EAST, SHAGAI SAIDU SHARIF SWAT.

Mr. Mohammad Saeed Forest Guard is hereby transferred from Demarcation Forest Division to Malakand Forest Division in the interest of public service with immediate effect.

SD/-
(MUHAMMAD YOUSAF KHAN)
CONSERVATOR OF FORESTS,
MALAKAND CIRCLE EAST,

No. 8960-61 /E,

Copy forwarded to the:-

1. Divisional Forest Officer Demarcation Forest Division, Swat.
2. Divisional Forest Officer Malakand Forest Division, Batkhela.

For information and necessary action.

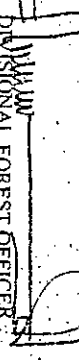
CONSERVATOR OF FORESTS,
MALAKAND CIRCLE EAST,
SAIDU SHARIF SWAT.

460-12-
11/01/11

FINAL SENIORITY LIST OF FOREST GUARDS IN RESPECT OF MALAKAND FOREST DIVISION AS STOOD ON 1/7/2012 Ann. B

S#	Name of Forest Guard	Father's Name	Distt: Demo:	Edu: Quali:	Tech: Quali:	Date of Birth	Date of entry into Govt. Service	Date of Appointment/ Adjusted	BPS	Remarks
1	Muhammad Younas	Rahimullah	---do---	B.A	23rd F/Guard training course.	11.02.1963	25.01.1988	01.07.2006	08	Appointed as F/Guard under Mkd. Social Forestry Project vide DFO Swat o/o No. 25, dt: 20.01.1988 i. Terminated on 31.01.1998, appointed on contract basis and adjusted in MSFP on 17.7.1999. ii. Terminated on 30.06.2000 adjusted in FSP on 20.01.2001. Adjusted on regular post on 01.7.2006 on SNE Post
2	Muhammad Hanayun	Hazrat Din	District Malakand	F.A	35th F/Guard training course	20.03.1971	12.03.1990	06.04.2007	08	Appointed as F/Guard under Mkd. Social Forestry Project vide P/D MSFP o/o No.13, dt: 09.05.1990. i. Terminated on 31.01.1998. Adjusted in FSP on 05.06.2004. ii. Terminated on 30.06.2006. Appointment on contract basis vide DFO Mkd. O/O No. 67 dated 05.04.2007. Regularized from the date of initial appointment vide DFO Malakand O/O No. 6 dated 2.01.2010.
3	Muhammad Hussain	Khadri Muhammad	Malakand	Matric	67th F/Guard training course	01.03.1970	26.07.1992	06.04.2007	08	Appointed as F/Guard under Mkd. Social Forestry Project vide P/D MSFP o/o No.08, dt: 25.07.1992. i. Terminated on 31.01.1998. Appointment as F/G on contract basis vide DFO Mkd. O/O No. 72, dated 05.04.2007.
4	Khurshaid Ahmad	Qazi Saleh Muhammad	---do---	Matric	62nd F/Guard training course	26.11.1969	06.04.2007	06.04.2007	08	Appointed as F/Guard on contract basis vide DFO Mkd. o/o No. 75, dt: 05.04.2007 and upgraded in BPS. 8 vide DFO O/O No. 24 dated 20.01.2016.
5	Zainul Abideen	Sultan Mehmood	---do---	BA	66th F/Guard training course	04.02.1980	06.04.2007	06.04.2007	08	Appointed as F/Guard on contract basis vide DFO Mkd. o/o No. 72, dt: 05.04.2007 and upgraded in BPS. 8 vide DFO O/O No. 24 dated 20.01.2016.
6	Javid Akhtar	Akhtar Muhammad	---do---	---do---	71st F/Guard training course	05.04.1983	06.04.2007	06.04.2007	08	Appointed as F/Guard on contract basis vide DFO Mkd. o/o No. 71, dt: 05.04.2007 and upgraded in BPS. 8 vide DFO O/O No. 24 dated 20.01.2016.
7	Naseer Hassan Mian	Said Akbar Mian	---do---	F.A	39th F/Guard training course	03.04.1970	09.05.1990	07.04.2007	08	Appointed as F/Guard vide P/O MSFP O/O No. 14 dated 9.5.1990. Terminated on 31.01.1998. Appointment as F/G on contract basis vide DFO Mkd. O/O No. 74, dated 05.04.2007 and upgraded in BPS. 8 vide DFO O/O No. 24 dated 20.01.2016.
8	Said Muhammad	Ghulam Muhammad	---do---	M.A	Untrained	14.04.1975	07.04.2007	07.04.2007	08	Appointed as F/Guard on contract basis vide DFO Mkd. o/o No. 69, dt: 05.04.2007, and upgraded in BPS. 8 vide DFO O/O No. 24 dated 20.01.2016.

9	Jafar Akram	Noor Hayas	Malakand	F.A	Untrained	01.01.1971	29.10.1992	30.03.2009	08	Appointed as F/G under Malakand Social Forestry Project vide O/O No. 33, dated 8.10.1992. Terminated on 31.01.1998, re-invested in service on regular basis vide DFO Malakand O/O No. 28, dated 30.3.2009. Terminated from Service vide O/O No. 18/G1, dated 31.01.2012. As per decision/assignment of KPK Service Tribunal dated 02.01.2017 in Service Appeal No. 6032/012, the services of the Forest Guard is hereby re-instatement and regularized vide DFO Malakand O/O No. 27 dated 22.02.2017.
10	Muhammad Saeed	Sadfar Khan	do	BSc	Untrained	8.8.1969	31.10.1992	31.10.1992	08	Appointment as F/Guard in Malakand Social Forestry Project. Now transferred from Demarcation Forest Office vide CE Malakand office order No. 20 dated 14.3.2018 and reported arrival in this Division on 15.3.2018.
11	Hidayatullah	Fazal Rehman	do	BA	39 th F/Guard training course	09.02.1963	08.10.1992	28.10.1992	08	Appointed as Forest Guard vide DFO/Project Director office order No. 33 dated 10.1.1992. Terminated on 31.1.1998. Now transferred to this Division and reported arrival on 2.4.2018.
12	Ganhar Rehman	Bakht Zarnia	do	MBA	Un-trained	1.1.1987	18.2.2016	18.2.2016	08	Appointment as Forest Guard under SFS vide DFO Malakand office order no. 26 dated 17.2.2016
13	Tahir Aziz	Abdul Aziz	do	BS(Hon) Forestry	do	19.1.1987	18.2.2016	18.2.2016	08	Appointment as Forest Guard under SFS vide DFO Malakand office order no. 26 dated 17.2.2016
14	Fahad Ali	Muhtd. Saleem	do	BS(Hon) Forestry	do	20.1.1993	18.2.2016	18.2.2016	08	Appointment as Forest Guard under SFS vide DFO Malakand office order no. 26 dated 17.2.2016
15	Asifq Hussain	Zafar Hussain	do	MA	do	10.4.1993	18.2.2016	18.2.2016	08	Appointment as Forest Guard under SFS vide DFO Malakand office order no. 26 dated 17.2.2016
16	Hassan	Rahman Shah	do	BA	do	19.8.1993	18.2.2016	18.2.2016	08	Appointment as Forest Guard under SFS vide DFO Malakand office order no. 26 dated 17.2.2016
17	Bilal Ahmad	Shah Roomi	Malakand	Matric	Untrained	10.04.1998	17.08.2018	17.08.2018	08	Appointed as Forest Guard against deceased quota vide DFO Malakand office order No. 01 dated 15.8.2018
18	Gul Badshah	Khan Badshah	Malakand	Matric	Trained	1.6.1989	7.2.1990	7.2.1990	08	Transferred from Upper Dir Forest Division vide CUPF-III office order No. 09 dated 16.12.2021 and reported arrival for duty in Malakand Forest Division on 1.1.2021
19	Muhammad Raheem	Gujar	Malakand	Matric	Trained	12.1.1968	11.11.1989	11.11.1989	08	Transferred from Nowshera Forest Division vide CCE office order No. 165 dated 2.6.2021 and reported arrival in Malakand Forest Division on 10.6.2021
20	Qasim Hayat	Muhammad Ayub	Malakand	F/Sc(DAE)	Un-trained	10.5.1998	19.11.2021	19.11.2021	08	Transferred from Swat Forest Division vide CE Malakand East Forest Circle office order No. 11 dated 29.11.2021 and reported arrival in Malakand Forest Division on 30.11.2021


 DIVISIONAL FOREST OFFICER
 MALAKAND FOREST DIVISION
 BATHHELA.

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کریٹ سب ڈویژنل فارسٹ آفیسر صاحب ملائکہ فارسٹ ڈویژن ایٹ بیٹ ضلع
 جو سب ڈویژنل فارسٹ آفیسر صاحب درستی فارسٹ سب ڈویژن درستی۔

موضوع :- 14- اپریل بابت سینارٹی ایٹ آف فارسٹ گارڈ

سب ڈویژنل فارسٹ آفیسر صاحب کے ذریعے ارسال شدہ ہے۔

بجائے اس کے کہ سب ڈویژنل فارسٹ آفیسر صاحب نے درستی فارسٹ سب ڈویژن میں

کو کیمپٹ فارسٹ گارڈ بھرتی ہوا۔ (کاپی لف ہے)۔
 No: 459/MSF مورخہ 28-1-1998

سب ڈویژنل فارسٹ آفیسر صاحب کی ہدایت پر (کاپی لف ہے)۔
 Terminate کیا گیا۔ (کاپی لف ہے)

بجائے اس کے کہ سب ڈویژنل فارسٹ آفیسر صاحب نے درستی فارسٹ سب ڈویژن میں
 کو کیمپٹ فارسٹ گارڈ بھرتی ہوا۔ (کاپی لف ہے)۔

بجائے اس کے کہ سب ڈویژنل فارسٹ آفیسر صاحب نے درستی فارسٹ سب ڈویژن میں
 کو کیمپٹ فارسٹ گارڈ بھرتی ہوا۔ (کاپی لف ہے)۔
 Leave without pay کنسڈر کیا گیا ہے۔ (کاپی لف ہے)۔

بجائے اس کے کہ سب ڈویژنل فارسٹ آفیسر صاحب نے درستی فارسٹ سب ڈویژن میں
 کو کیمپٹ فارسٹ گارڈ بھرتی ہوا۔ (کاپی لف ہے)۔
 Demarcation فارسٹ ڈویژن سوات کیا گیا ہے۔

بجائے اس کے کہ سب ڈویژنل فارسٹ آفیسر صاحب نے درستی فارسٹ سب ڈویژن میں
 کو کیمپٹ فارسٹ گارڈ بھرتی ہوا۔ (کاپی لف ہے)۔
 Demarcation فارسٹ ڈویژن سوات سے بحوالہ آفس آرڈر نمبر 20
 مورخہ 14-3-2018 کنسڈر کیا گیا ہے۔ اور بحال اپنی ڈیوٹی احسن طریقے سے ادا کر رہا ہے۔
 سب ڈویژنل فارسٹ آفیسر صاحب نے درستی فارسٹ سب ڈویژن میں
 کو کیمپٹ فارسٹ گارڈ بھرتی ہوا۔ (کاپی لف ہے)۔
 Demarcation فارسٹ ڈویژن سوات سے بحوالہ آفس آرڈر نمبر 20
 مورخہ 14-3-2018 کنسڈر کیا گیا ہے۔ اور بحال اپنی ڈیوٹی احسن طریقے سے ادا کر رہا ہے۔

No: 04 dt: 4-7-2022

آپ کا تابع زمان محمد سعید ولد صاحب بھٹان
 فارسٹ گارڈ درستی فارسٹ سب ڈویژن درستی

Forwarded to DFO MKd for
 favour of information & n/action
 please.

Sub-Divisional Forest Officer
 District Forest Sub-Division

-15-

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

APPEAL NO: _____ OF 20__

M. Saqat

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Forest

(RESPONDENT)
(DEFENDANT)

I/We Appellant
Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2022

[Signature]
CLIENT

ACCEPTED

[Signature]
NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT
(BC-10-0853)
(15401-0705985-5)

[Signature]
UMAR FAROOQ MOHMAND

[Signature]
WALEED ADNAN

&

[Signature]
MUHAMMAD AYUB
ADVOCATES

OFFICE:
Flat No. (TF) 291*-292 3rd Floor,
Deans Trade Centre, Peshawar Cantt.
(0311-9314232)