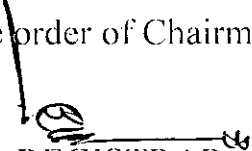


FORM OF ORDER SHEET

Court of _____

Case No. - _____ 1888 /2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/12/2022	<p>The appeal of Mr. Muhammad Ayaz resubmitted today by Mr. Hidayatullah 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>

3-A

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 1888/2022

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1001

Dated 15/8/2022

Muhammad Ayaz Son of Banat Gul,
R/o Mohallah Sethian, Village Urmar Miama,
Tehsil and District Peshawar.....**Appellant**

V E R S U S

- 1) Govt. of Khyber Pakhtunkhwa through Secretary
Communication and Works Department, Civil
Secretariat, Peshawar
- 2) Chief Engineer, Centre, Communication and Works
Department, Civil Secretariat, Peshawar
.....**Respondents**

**APPEAL UNDER SECTION 4 OF KPK SERVICE
TRIBUNAL ACT AGAINST THE ORDER/
SENIORITY LIST DATED 15.04.2022 AND
FINAL SENIORITY LIST DATED 20.05.2022**

Filed to-day

Registrar

15/8/2022

Prayer in writ petition


On acceptance of this service Appeal,
respondents be directed to place/show
the name of appellant at serial No.15 of
the tracer category instead of 38 in the
final seniority list.

Sir

It is submitted that this appeal was returned to the counsel for the appellant for removing the objections. Today he refiled the same but addresses of private respondents No. 3 to 26 are incomplete.

Submitted for appropriate order, please

Hon'ble Chairman

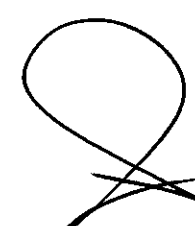

ew
7/12/2022

As last opportunity was given but even then the

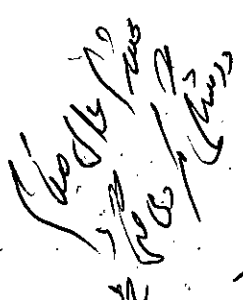
objections have not been removed,

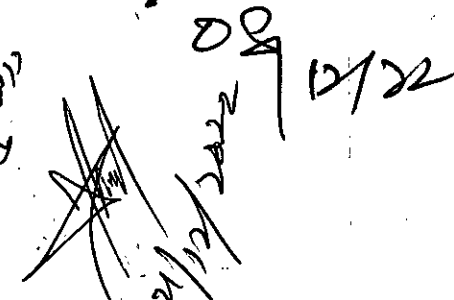
therefore, it be returned and if

presented again the question of limitation would have to be addressed by the appellant



No. 3543/ST
8-12-22


21/12/2022


21/12/2022

Respect Sir,

It is submitted that the present appeal was received on 15.08.2022, which was returned to the counsel for the appellant removing objection 1 to 2 (Flag-A). Today i.e. 14.11.2022 he refilled the same without removing the objection no. 1&2 with a note i.e. (Flag-B).

The appeal is now submitted to your honor under rules 7 (c) of the Khyber Pakhtunkhwa Service Tribunal rules 1974 for appropriate order please.

Worthy Chairman

The appellant shall re-submit the appeal after removal of objections within seven days / one week. This is treated as last opportunity.

REGISTRAR

17/11/22

21/11/22

No = 3255
Date = 21/11/22

Handwritten notes and signatures at the bottom of the page, including a signature and the date 21/11/22.


This is an appeal filed by Mr. Muhammad Ayaz today on 15/08/2022 against the order dated 22-05-2021 against which he preferred/made departmental appeal/representation on 04.08.2022 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority report as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/Counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following objections.

- ① Sub-rule-4 of rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974 requires that every civil servant to whom the relief claimed may affect shall also be shown as respondent
- ② Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent may also be submitted with the appeal.

No. 2394/ST,

DL 17/8 /2022.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Hidayatullah Khattak Adv. Pesh.

Si,
Resubmitted after laps of Statutory period

Hidayat

Si,
with utmost respect for question of limitation,
the captioned appeal may please received and
meanwhile I will remove the memo of
appeal arraying affecting civil servant
as respondents and spare copies as well

Hidayat
14/11/2022

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 1888 /2022

Muhammad Ayaz.....Appellant

V E R S U S

Govt. of KPK through
Secretary C&W Department & others.....Respondents

I N D E X

S#	Description of Documents	Annex	Pages
1.	Service petition		1-6
2.	Affidavit		7
3.	Addresses of parties		8-10
4.	Copy of Appointment Letter	A	9
5.	Copy of Diploma	B	10-11
6.	Copy of Tentative Seniority List and Objection Petitions	C	12-17
7.	Copy of final seniority list dated 20.05.2022	D	18-22
8.	Copy of representation.	E	23-24
9.	Wakalatnama		25

Through


Appellant


Hidayatullah Khattak
Advocate High Court

(C)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 1888 /2022

Muhammad Ayaz Son of Banat Gul,
R/o Mohallah Sethian, Village Urmar Miama,
Tehsil and District Peshawar.....**Appellant**

V E R S U S

- 1) Govt. of Khyber Pakhtunkhwa through Secretary Communication and Works Department, Civil Secretariat, Peshawar
- 2) Chief Engineer, Centre, Communication and Works Department, Civil Secretariat, Peshawar
- 3) Fahad Nazir Son of Fazal Mahmood O/o Executive Engineer Building D.I.khan
- 4) Murad Ali Son of Gul Jamal O/o Engineer Building Division Swabi
- 5) Zeeshan Amin Son of Noor ul Amin, O/o Superintending Engineer Circle, PBMC, Peshawar
- 6) Zahir Iqbal son of Muzafar Said O/o Executive Engineer C&W Division Dir Upper
- 7) Talat Hussain S/o Fahim Hussain, O/o Executive Engineer C&W Division Hangu
- 8) Muhammad Zahir Ghani S/o Muhammad Ghani, O/o XEN C&W Division, Karak

- 9) Zeeshan Son of Khurshid Ahmad, O/o Executive Engineer Building-I Peshawar
- 10) Sami Ullah Khan S/o Naeem Khan, O/o Executive Engineer Building Division, Kohat
- 11) Tauseef Ghani S/o Abdul Ghani, O/o Executive Engineer Building Division, Kohat
- 12) Habib Ullah Son of Abid Hussain, O/o Superintending Engineer, PBC, Circle Peshawar
- 13) Naveed Ullah Son of Abdul Qudoos, O/o Executive Engineer C&W Division, Kohat,
- 14) Mhammad Nauman S/o Saif ur Rehman, O/o XEN Building Division Bannu
- 15) Khurshid Ahmad Son of Sher Nawaz, O/o Superintending Engineer circle, PBMC Peshawar
- 16) Zakirullah S/o Muhammad Zarif, XEN Highway Division, North Waziristan
- 17) Waris Khan S/o Muhammad Naeem, O/o XEN Building Division, Mansehra
- 18) Ikram Ullah Shah S/o Muhammad Javed Khan, O/o XEN Highway South Waziristan
- 19) Muhammad Jahangir S/o Muhammad Nazeer, O/o XEN Mega Projects D.I. Khan
- 20) Salman Tariq Son of Muhammad Khan, O/o XEN Highway Division Swat

3

- 21) Ahmadullah Khan S/o Akthar Ali Khan, O/o SE C&W Circle Bannu
- 22) Muhammad Faizan S/o Muhammad Rafique, O/o XEN C&W Division, Torghar
- 23) Muhammad Naeem S/o Bostan Khan, O/o XEN Highway Division Abbottabad
- 24) Hanzala S/o Muhammad Amin Khan, O/o XEN Building South Waziristan.
- 25) Sardar Ai Khan S/o Gul Marjan Khan, O/o XEN Building Division, Swat
- 26) Fazli Subhan S/o Fazal Amin, O/o XEN Building Division Swat
(Respondent No.3 No.26 are posted as Tracers (BPS-07) in Communication & Works Department Khyber Pakhtunkhwa Peshawar

.....Respondents

APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT AGAINST THE ORDER/ SENIORITY LIST DATED 15.04.2022 AND FINAL SENIORITY LIST DATED 20.05.2022

Prayer in writ petition

On acceptance of this service Appeal, respondents be directed to place/show the name of appellant at serial No.15 of the tracer category instead of 38 in the final seniority list.

Any other relief, this Hon'ble Tribunal
may deem fit for the safe administration
of justice

Respectfully Sheweth:-

1. That Appellant was appointed as Tracer (BPS-05) in the Communication & Works Department on 16.05.2014. **(Copy of appointment letter is attached as annexure "A")**.
2. That during service, Appellant, has improved his professional Education by obtaining diploma of Associate Engineer (Civil) in year 2019. **(Copy of diploma is attached as annexure "B")**.
3. That respondents issued tentative seniority list on 15.04.2022 in which Appellant's name has been shown at serial No.38 but as per seniority his name was to be shown at serial No15 and on this Appellant submitted an objection petition on 26.04.2022. **(Copy of tentative seniority list and objection petitions are attached as annexure "C")**.
4. That the appellant after submitting objection petition, filing constitutional petition and in the meanwhile the respondents issued final seniority list

dated 20.05.2012 but without pasting in the notice board of the C&W Chief Officer and circulation in the C&W Office. **(Copy of final seniority list dated 20.05.2022 is attached as annexure "D")**.

5. That on this appealing submitted a representation on 04.08.2022 before the respondents. **(Copy of representation is attached as annexure "E")**.
6. That the appellant being aggrieved from the act of the respondents the appellant having no other remedy and is constrained to file the instant Service Appeal before this Hon'ble Tribunal on the following grounds amongst others:

GROUND S:

- A. That the respondents have not acted in accordance of law, procedure, violated the settled procedure and committed gross illegality while preparing and issuing the tentative seniority list.
- B. That Appellant has not been treated according to law and discriminated while placing him, at serial No.38 in the final seniority list dated 20.05.2022.

- C. That the seniority list issued by respondents is against facts, record and promotion policy dated 15.04.2019, hence liable to be set aside.
- D. That the Appellant has been shown at serial no.38 is to be place at serial No.15 as per quota promotion but respondents did not followed the promotion quota policy.
- E. That the Appellant has been condemned unheard by the inaction of the respondents by not passing any order upon the Appellant objection petition.
- F. That the amendment by the respondents regarding quota promotion of the in services traces dated 26.01.2020 are malafide without lawful authority and not apply judicial mind on the subject, hence liable of be struck down.
- G. That the impugned amendment dated 26.01.2022 is also violation of fundamental rights of the appellants.
- H. That respondent have not rectified the tentative seniority list so far which speaks malafide on the part of respondents.

- 6
- I. That the respondents are duty bound to issue final seniority list also shows malafide of the respondents.
 - J. That Appellant would like seek the permission of this Hon'ble Tribunal to share arguments on the merit of the instant appeal at the time of hearing.

It is, therefore most humbly prayed that on acceptance of this service appeal, respondents be directed to correct the final seniority list and the Appellant name be place/shown at serial No.15 of the tracer category and not at serial No.38.

Any other relief which is deems fit and appropriate in the circumstances of the case may also be passed in favour of the Appellant.


Appellant

Through


Hidayatullah Khattak
Advocate High Court

Dated 12.08.2022

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____/2022

Muhammad Ayaz.....Appellant

VERSUS

Govt. of KPK through
Secretary C&W Department & others.....Respondents

AFFIDAVIT

I, Muhammad Ayaz Son of Banat Gul, R/o Mohallah Sethian, Village Urmur Miama, Tehsil and District Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal Service** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

ATTESTED
Gul Daraz
Commissioner
Associate High Court
Peshawar


DEPONENT

8

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____/2022

Muhammad Ayaz.....Appellant

V E R S U S

Govt. of KPK through
Secretary C&W Department & others.....Respondents

ADDRESSES OF PARTIES

P E T I T I O N E R:

Muhammad Ayaz Son of Banat Gul,
R/o Mohallah Sethian, Village Urmar Miama,
Tehsil and District Peshawar

R E S P O N D E N T S:

- 1) Govt. of Khyber Pakhtunkhwa through Secretary Communication and Works Department, Civil Secretariat, Peshawar
- 2) Chief Engineer, Centre, Communication and Works Department, Civil Secretariat, Peshawar
- 3) Fahad Nazir Son of Fazal Mahmood
- 4) Murad Ali Son of Gul Jamal
- 5) Zeeshan Amin Son of Noor ul Amin
- 6) Zahir Iqbal son of Muzafar Said

- 7) Talat Hussain S/o Fahim Hussain
- 8) Muhammad Zahir Ghani S/o Muhammad Ghani
- 9) Zeeshan Son of Khurshid Ahmad
- 10) Sami Ullah Khan S/o Naeem Khan
- 11) Tauseef Ghani S/o Abdul Ghani
- 12) Habib Ullah Son of Abid Hussain
- 13) Naveed Ullah Son of Abdul Qudoos
- 14) Mhammad Nauman S/o Saif ur Rehman
- 15) Khurshid Ahmad Son of Sher Nawaz
- 16) Zakirullah S/o Muhammad Zarif
- 17) Waris Khan S/o Muhammad Naeem
- 18) Ikram Ullah Shah S/o Muhammad Javed Khan
- 19) Muhammad Jahangir S/o Muhammad Nazeer
- 20) Salman Tariq Son of Muhammad Khan
- 21) Ahmadullah Khan S/o Akthar Ali Khan
- 22) Muhammad Faizan S/o Muhammad Rafique
- 23) Muhammad Naeem S/o Bostan Khan

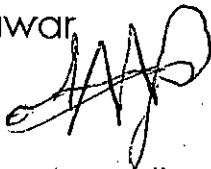
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24) Hanzala S/o Muhammad Amin Khan

25) Sardar Ai Khan S/o Gul Marjan Khan

26) Fazli Subhan S/o Fazal Amin

(Respondent No.3 No.26 are posted as Tracers
(BPS-07) in Communication & Works Department
Khyber Pakhtunkhwa Peshawar



Appellant

Through

Dated 12.08.2022


Hidayatullah Khattak
Advocate High Court

OFFICE OF THE CHIEF ENGINEER (CENTRE)
COMMUNICATION & WORKS DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR.
No. 96-E/14/Tr/CE/C&WD
Dated Peshawar the 16/05/2014

OFFER OF APPOINTMENT UNDER DECEASED SONS QUOTA

On the recommendations of the Departmental Selection Committee, in its meeting held on 29/04/2014 and after taking the Interview on 12th May 2014, you Mr. Muhammad Ayaz S/O Late Banat Gul (Ex-Driver) R/O Mohallah Sethan, Village Urmar Miana, Tehsil & District Peshawar, are hereby offered a post of Tracer in (BPS-05) Viz. 5400-260-13200 plus usual allowances as admissible under the rules, in terms of Rule-10(4) of the Khyber Pakhtunkhwa, Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, read with its amendment dated 31-08-2012, on the following terms and conditions as well as verification of your credentials from the concerned Board/Institution :-

- 1). You will get pay at the minimum of BPS-05 (Rs. 5400-260-13200) plus usual allowances as admissible under the Rules. You will also be entitled to the annual increment as per existing policy.
- 2). You will, be governed by the Khyber Pakhtunkhwa Civil Servants Act-1973 for all intents & purposes, be a Civil Servant and the laws applicable to the Civil Servants and Rules made there under.
- 3). Your employment in the Communication & Works Department is purely temporary and your services are liable to be terminated without assigning any reasons at fourteen (14) days prior notice or on the payment of 14-days salary in lieu of the notice. In case you desire to resign, 14-days notice will be necessary or in lieu thereof 14-days pay will be forfeited.
- 4). You will, initially be on probation for a period of One Year extendable upto two-Years.
- 5). To produce a Medical Certificate of fitness from the Medical Superintendent Police & Services Hospital Peshawar, before reporting for duty as required under the rules.
- 6). You should to join duty at your own expenses.
- 7). You will have to serve any where in Khyber Pakhtunkhwa Province.

If you accept the post on the above terms & conditions, you should report to Chief Engineer (North) C&W Department Peshawar within 14-days of the receipt of this offer and produce original certificates in support of your Qualification, Domicile, CNIC and Health Certificate etc.

NOTE: In-case the qualification which you preserve, found fake/bogus, your services will automatically stand terminated.

CHIEF ENGINEER (CENTRE)

Copy forwarded to the :-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Chief Engineer (North) C&W Department Peshawar, with the request to verify the credentials of the official concerned, before start of pay/salary, under intimation to this office.
3. Section Officer (Estab) C&W Department Peshawar / Member of DSC/DPC.
4. Mr. Muhammad Ayaz S/O Late Banat Gul (Ex-Driver) R/O Mohallah Sethan, Village Urmar Miana, Tehsil & District Peshawar.
5. Personal File of the Official.

CHIEF ENGINEER (CENTRE)

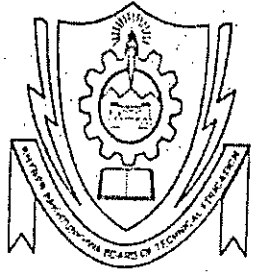
ATTESTED

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Serial No. 024091

Roll No 284720

Khyber Pakhtunkhwa Board of Technical Education



PESHAWAR (PAKISTAN)

DIPLOMA OF ASSOCIATE ENGINEER
Civil Revised 2013

Session Annual 2019

Certified that Mr/Miss MUHAMMAD AYAZ
 Son/Daughter of BANAT GUL
 Registration No. BRAVO/P/CT/16-4537
 of BRAVO PROFESSIONAL COLLEGE PESHAWAR
 has passed the Diploma of Associate Engineer Civil Revised 2013
 Examination held by the Khyber Pakhtunkhwa Board of Technical Education, Peshawar in the month
 of April 2019
 He/She secured 2174 Marks out of 3450 and has been placed in
 Grade B

In recognition thereof, this
 Diploma of Associate Engineer
 is awarded to him/her at Peshawar on the 31st day of October 2019


 ASSISTANT SECRETARY


 SECRETARY

This Diploma is issued without any alteration or eraser

ATTESTED

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(11)

DIPLOMA OF ASSOCIATE ENGINEER ISSUED BY THE BOARD OF TECHNICAL EDUCATION IS HELD EQUIVALENT TO F.A/F.Sc (PRE-ENGINEERING) OF THE BOARDS OF INTERMEDIATE AND SECONDARY EDUCATION IN PAKISTAN VIDE A BOOK OF EQUIVALENCY OF EDUCATIONAL QUALIFICATIONS IN PAKISTAN, PUBLISHED BY THE GOVERNMENT OF PAKISTAN MINISTRY OF EDUCATION INTER BOARD COMMITTEE OF CHAIRMEN, ISLAMABAD.

EVALUATION PLAN

1. 80% and above / Distinction
2. 70% and above but less than 80% / "A" Grade
3. 60% and above but less than 70% / "B" Grade
4. 50% and above but less than 60% / "C" Grade
5. 40% and above but less than 50% / "D" Grade
6. 33% and above but less than 40% / "E" Grade

Composed/Prepared by

Checked by _____

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ATTESTED

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12

Amir

OFFICE OF THE CHIEF ENGINEER, CENTRE
COMMUNICATION & WORKS DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR
No. 198-EI/155/ICE/C&WD

Dated Peshawar the 15/04/2022

REVISED TENTATIVE SENIORITY LIST

The Tentative Seniority List of Tracers (BPS-07) having 3 Years Diploma in Civil / Electrical / Mechanical Technology as stood on 31/03/2022 is hereby Circulated as under:-

S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt: Service	Date of Appointment to Class	Remarks
1	Syed Amjad Ali Shah	Syed Muzafar Ali Shah	Chitral	(i) B.A. (ii) DAE (Mech) '25/06/1997	21/04/1973	11/01/1996	01/07/2011	Appointed as Sub-Engineer on Acting Charge Remained 11-01-1996 to 30-06-2011 as Gauge Reader (BPS-05) and Re-designated as Tracer BPS (05) w.e.f 01/07/2011
2	Mohammad Nadeem	Mohammad Salim	Swabi	(i) F.Sc. (ii) 3 Yrs DAE (M) '21/03/2000	01/04/1967	01/02/1995	07/05/2012	Appointed as Sub-Engineer on Acting Charge on 30/04/2021 Remained 01/02/1995 to 01/05/2012 as Junior Clerk (B-05/07) & Re-designated as Tracer (B-05) w.e.f. 07/05/2012.
3	Ajmal Khan	Munif Khan	Peshawar	(i) Matric (ii) DAE (Elec) 12/06/2010	11/02/1988	15/05/2012	15/05/2012	
4	Ubaid-ur-Rahman	Abdur Rahman	Battagram	(i) Matric (ii) DAE (Civil) 14/05/1999	20/03/1979	21/05/2012	21/05/2012	Appointed as Sub-Engineer on Acting Charge on 30/04/2021
5	Fasi Ullah	Amir Sardar	Lakki Marwat	(i) Matric (ii) DAE (Civil) '31/10/2012	20/04/1991	18/05/2012	18/05/2012	
6	Zeeshan Danish	Sadr-ud-Din	Lakki Marwat	(i) Matric (ii) DAE (Civil) 19/11/2012	08/03/1989	21/05/2012	21/05/2012	
7	Danish Nawaz	Muhammad nawaz	Mansehra	(i) B.A (ii) DAE (Civil) 21/09/2011	10/07/1986	01/02/2013	01/02/2013	Remained 01/09/2006 to 31/01/2013 as Plumber (BPS-05) and Re-disiginated as Tracer (BPS-05) w.e.f 01/02/2013
8	Abdur Rehman Khan	Abdul Hamid Khan	Lakki Marwat	DAE (Civil) 14/06/2013	01/11/1993	24/01/2013	24/01/2013	Under deceased's son quota
9	Muhammad Sadique	Motabar Khan	D.I.Khan	DAE (Elec) 27/08/2013 M.A	18/09/1991	24/01/2013	24/01/2013	Under deceased's son quota
10	Ahmad Khan	Muhammad Khan	Lakki Marwat	(i) Matric (ii) DAE (C) '20/05/2014	25/03/1994	26/05/2014	26/05/2014	Under deceased's son quota

ATTESTED

13

S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt: Service	Date of Appointment to Class	Remarks
11	Muhammad Shafiq	Muhammad Nazir	Dir Upper	(i) B.A (ii) DAE (Civil) 22/09/2011	27/05/1990	27/05/2014	27/05/2014	Under deceased's son quota
12	Muhammad Imran Khattak	Haidar Zaman	Nowshera	(i) BA (ii) 3 Yr DAE (Civil) '09/6/2014	21/03/1986	01/06/2012	01/06/2012	
13	Fahad Nazir	Mohammad Nazir Khan	D.I.Khan	(i) Matric (ii) DAE (Civil) '17/06/2014	12/04/1994	19/05/2014	19/05/2014	Under deceased's son quota
14	Zafar Mahmood	Fazal Mahmood	Dir Upper	(i) Matric (ii) DAE (Mech) '09/09/2014	01/01/1993	21/05/2012	21/05/2012	
15	Murad Ali	Gul Jamal	Swabi	(i) Matric (ii) DAE (Civil) '24/09/2014	07/03/1991	29/06/2015	29/06/2015	Under deceased's son quota
16	Zeeshan Amin	Noor-Ul-Amin	Peshawar	DAE (Civil) 18/11/2014	10/11/1989	01/07/2015	01/07/2015	Under deceased's son quota
17	Zahir Iqbal	Muzafar Said	Dir Upper	DAE (Civil) 03/02/2010	10/10/1989	01/09/2015	01/09/2015	Under deceased's son quota
18	Talat Hussain	Fahim Hussain	Peshawar	DAE (Civil) 08/09/2016	10/03/1997	11/11/2015	11/11/2015	Under deceased's son quota
19	Muhammad Zakir Ghani	Muhammad Ghani	Karak	DAE (Civil) 09/03/2017	15/08/1993	09/05/2012	09/05/2012	Appointed as Sub-Engineer on Acting Charge on 30/04/2021
20	Zeeshan	Khurshid Ahmad	Peshawar	(i) Matric (ii) DAE (C) '21/03/2016	13/04/1995	29/05/2017	29/05/2017	Under deceased's son quota
21	Sami Ullah Khan	Naeem Khan	Lakki	(i) Matric (ii) 3 Yrs DAE (Civil) '11/10/2017	04/04/1992	08/05/2012	08/05/2012	Under deceased's son quota Appointed as Sub-Engineer on Acting Charge on 30/04/2021
22	Tauseef Ghani	Abdul Ghani	Karak	i) Matric ii) DAE (Civil) '22/04/2016	05/07/1992	26/09/2011	01/11/2017	Previous service as Ferro Printer w.e.f 26-09-2011 Secretary Board Of Technical Peshawar Letters No.BT&CE/CERT/2015 dated 28/02/2022 & No.BT&CE/CERT/BERI/140 dated 21/03/2022.

ATTESTED

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S.No.	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt. Service	Date of Appointment to Class	Remarks
23	Habib Ullah	Abid Hussain	Mohmand	i) Matric ii) 6-months Servay course. iii) 03-Months Auto-CAD Course. iv) DAE (Elec) 30/01/2018	13/03/1997	01/11/2017	01/11/2017	Under deceased's son quota
24	Naveed Ullah	Abdul Qudoos	Lakki	F.A. DAE (Civil) 13/02/2018	11/04/1990	21/05/2012	21/05/2012	Under deceased's son quota
25	Muhammad Nauman	Saif-ur-Rehman	Dikhan	i) DAE (Civil) 15/11/2018 ii) 6-months Servay course. iii) 06-Months Auto-CAD Course.	10/11/1997	01/11/2017	01/11/2017	Under deceased's son quota
26	Khurshid Ahmad	Sher Nawaz	Lakki Marwat	i) Matric ii) 1-year Servay course. iii) 06-Months Auto-CAD Course. iv). DAE Civil 22/11/2018	16/04/1995	01/08/2018	01/08/2018	Under deceased's son quota
27	Zakirullah	Muhammad Zarif	North Waziristan	i) DAE (Civil) 16/08/2013 ii) 06-Months Auto-CAD Course.	18/04/1983	12/12/2018.	12/12/2018	Under deceased's son quota
28	Waris Khan	Muhammad Naeem	Mansehra	DAE (Civil) 18/08/2016	28/04/1993	12/06/2019	12/06/2019	Under deceased's son quota XEN C&W Divn: Kohistan No-4271-E dated 17/02/2022
29	Ikram Ullah Shah	Muhammad Javed Khan	South Waziristan	DAE (Civil) 15/11/2018	15/06/1998	09/08/2019	09/08/2019	Under deceased's son quota
30	Muhammad Jahangir	Muhammad Nazeer	D.I.Khan	DAE (Civil) 12/02/2019	08/01/1999	09/08/2019	09/08/2019	Under deceased's son quota
31	Salman Tariq	Muhammad Khan	Swat	DAE (Civil) 20/08/2010 B.Tech (Civil) 01/12/2015	11/05/1989	23/09/2019	23/09/2019	Test conducted through ETEA

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S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt: Service	Date of Appointment to Class	Remarks
32	Ahmadullah Khan	Akhtar Ali Khan	Bannu	DAE (Civil) 27/01/2007 B.Tech (Civil) 15/04/2011	01/04/1986	24/09/2019	24/09/2019	Test conducted through ETEA
33	Muhammad Faizan	Muhammad Rafique	Mansehra	DAE (Civil) 04/08/2014 B.Tech (Civil) 15/11/2017	01/03/1995	24/09/2019	24/09/2019	Test conducted through ETEA
34	Muhammad Nadeem	Bostan Khan	Abbottabad	DAE (Civil) 26/05/2009 B.Tech (Pass) 10/11/2010	22/04/1988	25/09/2019	25/09/2019	Test conducted through ETEA
35	Hanzala	Muhammad Amin Khan	South Waziristan	DAE (Civil) 15/08/2013 B.Tech(Civil) 15/05/2018	01/03/1992	25/09/2019	25/09/2019	Test conducted through ETEA
36	Sardar Ali Khan	Gul Marjan Khan	Swat	DAE (Civil) 25/04/2016 B.Tech (Civil) 30/11/2018	10/01/1995	25/09/2019	25/09/2019	Test conducted through ETEA
37	Fazli Subhan	Fazal Amin	Swat	DAE (Civil) '17/03/2017 B.Tech (Civil) '17/05/2017	09/05/1989	26/09/2019	26/09/2019	Test conducted through ETEA
38	Muhammad Ayaz	Banat Gul	Peshawar	i) Matric ii) 1 year Servay iii) DAE (Civil) 31/10/2019	08/12/1988	26/05/2014	26/05/2014	Under deceased's son quota
39	Noor Zeb Khan	Imtiaz Khan	Bannu	DAE (Civil) 21/09/2011 B.Tech (Civil) 10/05/2016	15/10/1990	12/02/2020	12/02/2020	Under deceased's son quota dated 12/02/2020
40	Aaiman Baloch	Muhammad Tahir	D.I.Khan	DAE (Civil) 18/06/2019	25/01/1993	12/02/2020	12/02/2020	Under deceased's son quota dated 12/02/2020
41	Muhammad Adnan	Said Muhammad	Mardan	DAE (Civil) '08/03/2017 BA	12/01/1995	12/02/2020	12/02/2020	Under deceased's son quota dated 12/02/2020
42	Naveed Khan	Mohammad Ramzan	D.I.Khan	DAE (Civil) '26/10/2009	03/03/1987	13/02/2020	13/02/2020	Under deceased's son quota dated 12/02/2020

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S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt: Service	Date of Appointment to Class	Remarks
43	Tanzilur Rehman	Muhammad Hanif	D.I.Khan	DAE (Civil) 23/08/2019	14/11/1997	13/02/2020	13/02/2020	Under deceased's son quota dated 12/02/2020
44	Shah Zaman Khan	Shah Riaz Khan	Bannu	DAE (Civil) 08/04/2008	08/03/1988	26/11/2009	26/11/2021	Appointed as Fitter Cooly w.e.f 26 11 2009 Redisgnated as Fero Printed w e f 06 12.2017. Promoted from the post of Fero Printer / Fero Khalasi

[Signature]
CHIEF ENGINEER (CENTR)

Copy of the above forwarded to:-

1. The Secretary to Govt of Khyber Pakhtunkhwa, C&W Department Peshawar.
2. All Chief Engineers C&W Department, Khyber Pukhtunkhwa.
3. The Managing Director, Pakhtunkhwa Highways Authority, Peshawar.
4. Project Director FMR/PMU C&W Department Peshawar.
5. All the Superintending Engineers in C&W Department Khyber Pakhtunkhwa (i/c Merged Area).
6. All the Executive Engineers in C&W Department Khyber Pakhtunkhwa (i/c Merged Area).
7. The Deputy Director (IT) C&W Secretariat Peshawar. He is requested to upload the same on the website of C&W Department. (www.cwd.gkp.pk)

Note: The official concerned to note that any objections regarding Name, Father's name, Qualification etc. may be sent to this office with documentary proofs within 20-Days for further course of action accordingly.

[Signature]
ADMINISTRATIVE OFF

[Signature]
ATTESTED

(17)

The Administrative Officer,
O/O Chief Engineer (Centre),
C&W Department Peshawar.

Subject: AMENDMENT IN REVISED TENTATIVE SENIORITY LIST

Respected Sir,

It is brought to your kind notice that Revised Tentative Seniority List of Tracers has been issued vide your office letter No. 198-E/1656/CEC/C&WD, dated 15-04-2022.


In this regard, your kind attention is invited towards the following few points for your kind consideration:

1. I have been pushed back from Sl. No. 15 to Sl. No. 38 in the Tentative Seniority List of Tracers with effect from the date of my DAE Diploma completed during service, not from the date of my arrival in the Department in light of Amendment in Service Rules notified vide No. SOE/C&WD/8-12/2022 dated 26-01-2022 (copy attached).
2. Nothing such is mentioned in the NOC granted to me for my DAE completed during service (copy attached).
3. As a result of the said amendment my 08-Years Service from the year 2014 to 2022 has become fruitless.
4. Seniority of the Tracers with DAE completed during service should be considered w-e-from the date of issuance of DMC instead of Degree as DAE Degree is issued 12 to 18 Months later than the issuance of result (DMC). As a result service of the Tracers for 12 to 18 Months bear no fruitful result.
5. Seniority of the already Diploma Holder appointees Tracers and the Tracers who have completed their DAE during service may be maintained separately so as to overcome the loss caused to the Tracers who have completed their DAE during service.

In light of the above, it is therefore requested that my seniority may kindly be fixed from the date of my arrival OR Seniority List of Tracers who have completed their DAE during service may be maintained separately in the best interest of public service so as to avoid me and the department from litigation process please.

C.E. C&W Deptt.
(Ct. No.)
Duty No. 300
Date 21/04/22
Time
Officer
Sd/-
O.E. No.
T.D.
A.O.
BEAD

ATTESTED


26/4/2022
(MUHAMMAD AYAZ)
TRACER
O/O Executive Engineer
Building Division-I Peshawar



FINAL SENIORITY LIST

In pursuance to Section B (1) and (5) of the Khyber Pakhtunkhwa Civil Servants Acts 1973, read with C&W Department (Recruitment/Appointment) Rules 2010 notified vide No SOE/C&WD/3-12/2009 dated 25/03/2010, the final of Tracers (BPS-07) having 3 Years Diploma in Civil / Electrical / Mechanical Technology as stood on 30/04/2022 is hereby notified as under -

S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry Into Govt. Service	Date of Appointment to Class	Remarks
1	Syed Ayyaz Ali Shah	Syed Muzafar Ali Shah	Citral	(i) B A (ii) DAE (Mech) 25/06/1997	21/04/1973	11/01/1999	01/07/2011	Appointed as Sub-Engineer on Acting Charge - 11-01-1995 to 30-06-2011 as Gauge Reader (BPS-05) and Re-designated as Tracer BPS (05) w.e.f 01/07/2011
2	Monammad Nadeem	Monammad Salim	Swabi	(i) F Sc (ii) 3 Yrs DAE (M) 21/03/2000	01/04/1967	01/02/1995	07/05/2012	Appointed as Sub-Engineer on Acting Charge on 30/04/2021 01/02/1995 to 01/05/2012 as Junior Clerk (B-05/07) & Re-designated as Tracer (B-05) w.e.f 07/05/2012
3	Ajmal Khan	Munaf Khan	Peshawar	(i) Matic (ii) DAE (Elec) 12/09/2010	11/02/1983	15/05/2012	15/05/2012	
4	Ubaid-ur-Rahman	Abdur Rahman	Battagram	(i) Matic (ii) DAE (Civil) 14/05/1999	20/03/1979	21/05/2012	21/05/2012	Appointed as Sub-Engineer on Acting Charge on 30/04/2021
5	Fasi Ullah	Amir Sardar	Lakki Marwal	(i) Matic (ii) DAE (Civil) 31/10/2012	20/04/1991	18/05/2012	18/05/2012	
6	Zeeshan Danish	Sadr-ud-Din	Lakki Marwal	(i) Matic (ii) DAE (Civil) 19/11/2012	08/03/1989	21/05/2012	21/05/2012	
7	Danish Nawaz	Muhammad nawaz	Mansehra	(i) B A (ii) DAE (Civil) 21/09/2011	10/07/1986	01/02/2013	01/02/2013	01/09/2006 to 31/01/2013 as Pumper (BPS-05) and Re-designated as Tracer (BPS-05) w.e.f 10/02/2013
8	Abdur Rehman Khan	Abdul Hamid Khan	Lakki Marwal	DAE (Civil) 14/05/2013	01/11/1993	24/01/2013	24/01/2013	Under deceased's son quota
9	Muhammad Sadique	Motabar Khan	D.I Khan	DAE (Elec) 27/08/2013 M A	18/09/1991	24/01/2013	24/01/2013	Under deceased's son quota
10	Ahmad Khan	Muhammad Khan	Lakki Marwal	(i) Matic (ii) DAE (C) 20/05/2014	25/03/1994	26/05/2014	26/05/2014	Under deceased's son quota

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OFFICE OF THE CHIEF ENGINEER, CENTRE
COMMUNICATION & WORKS DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR
No. 198-EI/295/CEC&WD

Dated Peshawar the 20/05/2022

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S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt: Service	Date of Appointment to Class	Remarks
11	Muhammad Shafiq	Muhammad Nazir	Dir Upper	(i) B.A (ii) DAE (Civil) 22/09/2011	27/05/1990	27/05/2014	27/05/2014	Under deceased's son quota
12	Muhammad Imran Khattak	Haidar Zaman	Nowshera	(i) BA (ii) 3 Yr DAE (Civil) '09/6/2014	21/03/1986	01/06/2012	01/06/2012	
13	Fahad Nazir	Mohammad Nazir Khan	D.I.Khan	(i) Matric (ii) DAE (Civil) '17/06/2014	12/04/1994	19/05/2014	19/05/2014	Under deceased's son quota
14	Zafar Mahmood	Fazal Mahmood	Dir Upper	(i) Matric (ii) DAE (Mech) '09/09/2014	01/01/1993	21/05/2012	21/05/2012	
15	Murad Ali	Gul Jamal	Swabi	(i) Matric (ii) DAE (Civil) '24/09/2014	07/03/1991	29/06/2015	29/06/2015	Under deceased's son quota
16	Zeeshan Amin	Noor-Ul-Amin	Peshawar	DAE (Civil) 18/11/2014	10/11/1989	01/07/2015	01/07/2015	Under deceased's son quota
17	Zahir Iqbal	Muzafar Said	Dir Upper	DAE (Civil) 03/02/2010	10/10/1989	01/09/2015	01/09/2015	Under deceased's son quota
18	Talat Hussain	Fahim Hussain	Peshawar	DAE (Civil) 08/09/2016	10/03/1997	11/11/2015	11/11/2015	Under deceased's son quota
19	Muhammad Zakir Ghani	Muhammad Ghani	Karak	DAE (Civil) 09/03/2017	15/08/1993	09/05/2012	09/05/2012	Appointed as Sub-Engineer on Acting Charge on 30/04/2021
20	Zeeshan	Khurshid Ahmed	Peshawar	(i) Matric (ii) DAE (C) '21/03/2016	13/04/1995	29/05/2017	29/05/2017	Under deceased's son quota
21	Sami Ullah Khan	Naeem Khan	Lakki	(i) Matric (ii) 3 Yrs DAE (Civil) '11/10/2017	04/04/1992	08/05/2012	08/05/2012	Under deceased's son quota Appointed as Sub-Engineer on Acting Charge on 30/04/2021
22	Tauseef Ghani	Abdul Ghani	Karak	(i) Matric (ii) DAE (Civil) '22/04/2016	05/07/1992	26/09/2011	01/11/2017	Previous service as Ferro Printer w.e.f 26-09-2011 Secretary Board Of Technical Peshawar Letters No.BT&CE/CERT/2015 dated 28/02/2022 & No.BT&CE/CERT/BERI/140 dated 21/03/2022.

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S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt. Service	Date of Appointment to Class	Remarks
23	Habib Ullah	Abid Hussain	Mohmand	i) Matric ii) 6-months Servay course. iii) 03-Months Auto-CAD Course. iv) DAE (Elec) 30/01/2018	13/03/1997	01/11/2017	01/11/2017	Under deceased's son quota
24	Naveed Ullah	Abdul Qudoos	Lakki	F.A. DAE (Civil) 13/02/2018	11/04/1990	21/05/2012	21/05/2012	Under deceased's son quota
25	Muhammad Nauman	Saif-ur-Rehman	DIKhan	i) DAE (Civil) 15/11/2018 ii) 6-months Servay course. iii) 06-Months Auto-CAD Course.	10/11/1997	01/11/2017	01/11/2017	Under deceased's son quota
26	Khurshid Ahmad	Sher Nawaz	Lakki Marwat	i) Matric ii) 1-year Servay course. iii) 06-Months Auto-CAD Course. iv) DAE Civil 22/11/2018	16/04/1995	01/08/2018	01/08/2018	Under deceased's son quota
27	Zakirullah	Muhammad Zarif	North Waziristan	i) DAE (Civil) 16/08/2013 ii) 06-Months Auto-CAD Course.	18/04/1983	12/12/2018	12/12/2018	Under deceased's son quota
28	Waris Khan	Muhammad Naeem	Mansehra	DAE (Civil) 18/08/2016	28/04/1993	12/06/2019	12/06/2019	Under deceased's son quota XEN C&W Divn: Kohistan No.427/1-E dated 17/02/2022
29	Ikram Ullah Shah	Muhammad Javed Khan	South Waziristan	DAE (Civil) 15/11/2018	15/06/1998	09/08/2019	09/08/2019	Under deceased's son quota
30	Muhammad Jahangir	Muhammad Nazeer	D.I.Khan	DAE (Civil) 12/02/2019	08/01/1999	09/08/2019	09/08/2019	Under deceased's son quota
31	Salman Tariq	Muhammad Khan	Swat	DAE (Civil) 20/08/2010 B.Tech (Civil) 01/12/2015	11/05/1989	23/09/2019	23/09/2019	Test conducted through ETEA

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S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt. Service	Date of Appointment to Class	Remarks
32	Ahmadullah Khan	Akhtar Ali Khan	Bannu	DAE (Civil) 27/01/2007 B.Tech (Civil) 15/04/2011	01/04/1996	24/09/2019	24/09/2019	Test conducted through ETEA
33	Muhammad Faizan	Muhammad Rafique	Mansehra	DAE (Civil) 04/08/2014 B.Tech (Civil) 15/11/2017	01/03/1995	24/09/2019	24/09/2019	Test conducted through ETEA
34	Muhammad Nadeem	Bostan Khan	Abbottabad	DAE (Civil) 26/05/2009 B.Tech (Pass) 10/11/2010	22/04/1988	25/09/2019	25/09/2019	Test conducted through ETEA
35	Hanzala	Muhammad Amin Khan	South Waziristan	DAE (Civil) 15/08/2013 B.Tech (Civil) 15/05/2018	01/03/1992	25/09/2019	25/09/2019	Test conducted through ETEA
36	Sardar Ali Khan	Gul Marjan Khan	Swat	DAE (Civil) 25/04/2016 B.Tech (Civil) 30/11/2018	10/01/1995	25/09/2019	25/09/2019	Test conducted through ETEA
37	Fazal Subhan	Fazal Amin	Swat	DAE (Civil) 17/03/2017 B.Tech (Civil) 17/05/2017	09/05/1989	26/09/2019	26/09/2019	Test conducted through ETEA
38	Muhammad Ayaz	Banat Gul	Peshawar	i) Malic ii) 1 year Servay iii) DAE (Civil) 31/10/2019	08/12/1988	26/05/2014	26/05/2014	Under deceased's son quota
39	Noor Zeb Khan	Imtiaz Khan	Bannu	DAE (Civil) 21/09/2011 B.Tech (Civil) 10/05/2016	15/10/1990	12/02/2020	12/02/2020	Under deceased's son quota dated 12/02/2020
40	Aaiman Baloch	Muhammad Tahir	D.I.Khan	DAE (Civil) 18/06/2019	25/01/1993	12/02/2020	12/02/2020	Under deceased's son quota dated 12/02/2020
41	Muhammad Adnan	Said Muhammad	Mardan	DAE (Civil) 08/03/2017 BA	12/01/1995	12/02/2020	12/02/2020	Under deceased's son quota dated 12/02/2020
42	Naveed Khan	Mohammad Ramzan	D.I.Khan	DAE (Civil) 26/10/2009	03/03/1987	13/02/2020	13/02/2020	Under deceased's son quota dated 12/02/2020

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S.	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt. Service	Date of Appointment to Class	Remarks
43	Tanzilur Rehman	Muhammad Hand	D.I. Khan	DAE (Civil) 23/08/2019	14/11/1997	13/02/2020	13/02/2020	Under deceased's son quota dated 12/02/2020
44	Shah Zaman Khan	Shah Riaz Khan	Bannu	DAE (Civil) 08/04/2008	01/03/1988	26/11/2009	26/11/2021	Appointed as Filer Copy w.e 20.11.2009 Resigned as Fero Printer w.e 12.2017 Promoted from the post of Fero Printer / Fero Khalas.

Copy of the above forwarded to:-

1. The Secretary to Govt of Khyber Pakhtunkhwa, C&W Department Peshawar.
2. All Chief Engineers C&W Department, Khyber Pakhtunkhwa.
3. The Managing Director, Pakhtunkhwa Highways Authority, Peshawar.
4. Project Director FMR/PMU C&W Department Peshawar.
5. All the Superintending Engineers in C&W Department Khyber Pakhtunkhwa (i/c Merged Area)
6. All the Executive Engineers in C&W Department Khyber Pakhtunkhwa (i/c Merged Area)
7. The Deputy Director (IT) C&W Secretariat Peshawar. He is requested to upload the same on the website of C&W Department (www.cwd.gkp.pk)


CHIEF ENGINEER (CENTRE)


ADMINISTRATIVE OFFICER

ATTESTED


To

The Administrative Officer,
O/O Chief Engineer (Centre),
C&W Department Peshawar.

SUBJECT: AMENDMENT IN FINAL SENIORITY LIST

Ref: In continuation of my application, Your Office Diary No. 300, dated 27-04-2022

Respected Sir,

It is brought to your kind notice that Final Seniority List of Tracers has been issued vide your office letter No. 198-E/295/CE/C&WD, dated 20-05-2022 but unfortunately, I was not informed of its issuance as the same has neither been received in my office nor circulated through whatsapp etc. I have been informed through other employees on 27-07-2022 and got a photocopy/printout of the Final seniority List from your office.

In this regard, your kind attention was invited towards few important points in my previous application under reference but regretted to mention that no response has been received so far.

Your kind attention is once again re-invited towards the following few points for sympathetic consideration:

1. I have been pushed back from Sl. No. 15 to Sl. No. 38 in the Final Seniority List of Tracers with effect from the date of my DAE Diploma completed during service, not from the date of my arrival in the Department in light of Amendment in Service Rules notified vide No. SOE/C&WD/8-12/2022 dated 26-01-2022 (copy attached). My plea is to maintain my Seniority List from the date of my arrival because the said rules should be implemented on the later appointees.
2. Nothing such is mentioned in the NOC granted to me for my DAE completed during service (copy attached).

C.E. C&W Deptt. (Centre)
Dairy No 80
Date 04-08-22
Cass No
C.E. Caw
S.E. (H.O)
D.E. (Bar)
T.O
A.O.
B&AO
C.D.

ATTESTED

(24)

3. As a result of the said amendment my 08-Years Service from the year 2014 to 2022 has become fruitless for promotion.
4. Some Tracers have been appointed prior to issuance of their DAE Degree as evident from the Seniority List attached which means that they were appointed on the basis of DMC.
5. In light of point-4 mentioned above, it is suggested that the Seniority List of the Tracers who have completed their DAE Diploma during service, should be maintained from the date of issuance of DMC instead of issuance of DAE Degree which is issued 12 to 18 months later from declaration of result (DMC). As a result 12 to 18 months service of the Tracers bear no fruitful result for the purpose of promotion.
6. OR it is suggested that Seniority List of the Diploma Holder appointees Tracers and the Tracers who have completed their DAE Diploma during service may be maintained separately so as to overcome the loss to some extent which caused to the Tracers who have completed their DAE Diploma during service.

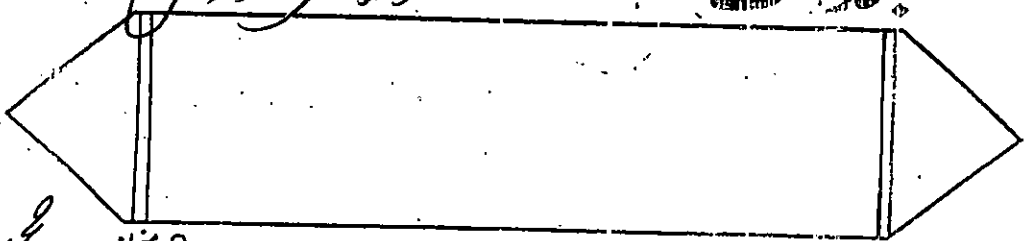
In light of the above, it is therefore once again requested that my seniority may kindly be fixed from the date of my arrival OR Seniority list may kindly be maintained from the date of issuance of result (DMC) OR Seniority List of Tracers who have completed their DAE during service may kindly be maintained separately in the best interest of public service so as to avoid me and the department from litigation procedure please.

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(MUHAMMAD AYAZ)
Tracer
O/O Executive Engineer
Building Division-I
Peshawar


ATTESTED

بعد ازاں - سرپرست ریجنل



عقد ایاز
بنام صلوص

- مورخہ
- مقدمہ
- دعویٰ
- جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ
 آن مقام 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 ثالثہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور
 بصورت ڈگری کرنے اجزاء اور صولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی
 نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
 کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
 پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے ہوگا۔
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے کہ پیروی
 مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ بسند ہے۔

Handwritten notes and signatures on the left side of the page, including a signature and the number '10-1598'.

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